

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SEB INVESTMENT MANAGEMENT AB,
individually and on behalf of all others
similarly situated,

Plaintiffs,

V.

SYMANTEC CORPORATION and GREGORY S.
CLARK,

Defendants.

Case No. 3:18-cv-02902-WHA

ECF CASE

**DECLARATION OF JEREMY P. ROBINSON IN SUPPORT OF:
(A) LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF SETTLEMENT
AND PLAN OF ALLOCATION; AND (B) LEAD COUNSEL'S
MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

DECLARATION OF JEREMY P. ROBINSON
No. 3:18-CV-02902-WHA

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EXHIBIT LIST

- Exhibit 1 Declaration of Caroline Rifall, Head of Legal at SEB Investment Management AB, in Support of: (A) Lead Plaintiff's Motion for Final Approval of Settlement and Plan of Allocation; and (B) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses ("Rifall Decl.")
- Exhibit 2 Declaration of Eric J. Miller Regarding: (A) Mailing of the Settlement Notice and Claim Form; (B) Publication of the Summary Settlement Notice; and (C) Report on Requests for Exclusion Received to Date ("Miller Decl.")
- Exhibit 3 Summary of BLB&G Hours and Lodestar
- Exhibit 4 Summary of BLB&G Hours and Lodestar Removed in the Interest of Billing Judgment
- Exhibit 5 Qualifications, Role and Rate Information for Lead Counsel's Attorneys and Professional Staff
- Exhibit 6 BLB&G Firm Resume
- Exhibit 7 Detail of BLB&G Hours and Lodestar by Project
- Exhibit 8 Summary of Litigation Expenses
- Exhibit 9 Detail of Travel Expenses
- Exhibit 10 Detail of Expert Expenses
- Exhibit 11 Cornerstone Research, Securities Class Action Filings, 2020 Year In Review (2021)
- Exhibit 12 Janeen McIntosh and Svetlana Starykh, NERA Economic Consulting, Recent Trends in Securities Class Action Litigation: 2020 Full-Year Review (2021)
- Exhibit 13 Cornerstone Research, Securities Class Action Settlements: 2020 Review and Analysis (2021)
- Exhibit 14 *Luna v. Marvell Tech. Grp.*, Case No. 3:15-cv-05447-WHA, slip op. (N.D. Cal. Apr. 20, 2018), ECF No. 235
- Exhibit 15 *In re Snap Inc. Sec. Litig.*, Case No. 2:17-cv-03679-SVW-AGR, slip op. (C.D. Cal. Mar. 9, 2021), ECF No. 400
- Exhibit 16 *In re Allergan, Inc. Proxy Violation Sec. Litig.*, No. 8:14-cv-02004-DOC-KES, slip op. (C.D. Cal. Aug. 14, 2018), ECF No. 637

- 1 Exhibit 17 *In re Int'l Rectifier Corp. Sec. Litig.*, No. 07-02544, slip op. (C.D. Cal. Feb. 8, 2010), ECF No. 316
- 2 Exhibit 18 *In re Brocade Sec. Litig.*, No.: 3:05-CV-02042-CRB, slip op. (N.D. Cal. Jan. 26, 2009), ECF No. 496-1
- 3
- 4 Exhibit 19 *In re SunEdison, Inc. Sec. Litig.*, No. 1:16-md-2742-PKC, slip op. (S.D.N.Y. Oct. 25, 2019), ECF No. 672
- 5 Exhibit 20 *San Antonio Fire & Police Pension Fund v. Dole Food Co.*, No. 1:15-cv-1140-LPS, slip op. (D. Del. July 18, 2017), ECF No. 100
- 6
- 7 Exhibit 21 *Freudenberg v. E*Trade Fin. Corp.*, No. 07 Civ. 8538 (JPO) (MHD), slip op. (S.D.N.Y. Oct. 20, 2012), ECF No. 154
- 8
- 9 Exhibit 22 *In re Tremont Sec. Law, State Law & Ins. Litig.*, No. 08 Civ. 11117 (TPG), slip op. (S.D.N.Y. Aug. 19, 2011), ECF No. 603
- 10 Exhibit 23 *Cornwell v. Credit Suisse Grp.*, No. 08-cv-03758 (VM), slip op. (S.D.N.Y. July 18, 2011), ECF No. 117
- 11
- 12 Exhibit 24 *In re Tonopah Solar Energy, LLC*, Application for Retention of Counsel, Case No. 20-11884 (KBO) (Bankr. D. Del. July 30, 2020), ECF No. 43
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1 I, Jeremy P. Robinson, declare and state as follows:

2 1. I am an attorney admitted *pro hac vice* to this Court. I am a partner in the law firm
3 of Bernstein Litowitz Berger & Grossmann LLP (“BLB&G”), which is the Court-appointed Lead
4 Counsel for Lead Plaintiff, SEB Investment Management AB (“SEB” or “Lead Plaintiff”), and the
5 Class.¹ I submit this declaration in support of Lead Plaintiff’s Motion for Final Approval of
6 Settlement and Plan of Allocation, and Lead Counsel’s Motion for Attorneys’ Fees and Litigation
7 Expenses. I have personal knowledge of the matters set forth herein based on my active
8 participation in the prosecution and settlement of this action and could and would testify
9 competently thereto.

10 **I. INTRODUCTION**

11 2. Lead Plaintiff and Lead Counsel are pleased to present the proposed Settlement to
12 the Court for final approval. The proposed Settlement, if approved by the Court, will resolve all
13 claims in this securities class action (the “Action”) in exchange for a cash payment of \$70 million
14 from Defendants.² The Settlement was achieved after three years of hard-fought litigation,
15 including the initial dismissal of the entire case, the resurrection of certain securities fraud claims,
16 a contested class certification motion, the completion of extensive fact and expert discovery,
17 including the analysis of 2.1 million pages of documents and a total of 29 depositions, and full
18 briefing on Defendants’ summary judgment motion. The Settlement also is the product of two
19 settlement conferences held months apart and extensive arm’s length negotiations—all of which
20 were closely supervised by Magistrate Judge Donna M. Ryu. As detailed herein, Plaintiffs
21 respectfully submit that the \$70 million cash Settlement is an excellent result for the Class given
22 the risks, costs, and delays of continued litigation. It should be approved in full.

24 ¹ Herein, “Lead Plaintiff” refers to Lead Plaintiff, SEB, and “Lead Counsel” refers to Court-
25 appointed Lead Counsel, BLB&G. “Plaintiffs” refers to Lead Plaintiff, on behalf of the Class, and
26 Lead Counsel collectively.

27 ² Defendants are Symantec Corporation (“Symantec” or the “Company”) and former CEO,
28 Gregory S. Clark (“Clark”).

1 3. **Lead Plaintiff And Lead Counsel's Substantial Litigation Effort.** To achieve
2 the proposed Settlement, Lead Plaintiff and Lead Counsel dedicated themselves to years of hard-
3 fought litigation. As detailed below, Plaintiffs faced substantial risks and challenges in developing
4 the factual record necessary to overcome Defendants' many defenses to Lead Plaintiff's claims.
5 If Defendants succeeded on any one of the multitude of defenses they pursued, any recovery would
6 have been substantially reduced or even zero.

7 4. As such, Lead Counsel had to devote substantial time and resources to the
8 prosecution of this litigation. To start, Lead Counsel conducted a detailed investigation, which
9 cumulatively included interviews of 155 former Symantec employees and the review and analysis
10 of tens of thousands of pages of public statements, analyst reports, and news articles. Lead Counsel
11 drafted two detailed complaints, briefed two extensive rounds of pleadings motions, and through
12 perseverance and hard work overcame the Court's initial dismissal of the entire case. Plaintiffs
13 also prevailed in a contested class certification motion, which included extensive briefing, expert
14 reports, a deposition of Lead Plaintiff and two expert depositions.

15 5. Fact discovery in this case was extensive and hard-fought. To gather the
16 information needed to prove their claims of accounting fraud, Plaintiffs had to obtain, analyze, and
17 understand a vast number of documents from Defendants and non-parties to educate themselves,
18 including regarding the details of Symantec's accounting practices and reported revenues,
19 transition and transformation ("T&T") expenses and non-GAAP measures. To that end, Lead
20 Counsel drafted and served detailed document requests on Defendants and subpoenas on twelve
21 (12) non-parties, including Symantec's outside auditor, KPMG, and its accounting consultant on
22 non-GAAP measures, Ernst & Young (EY). Lead Counsel also had to engage in extensive
23 correspondence and many hours of negotiations with Defendants and third parties regarding the
24 scope and nature of the documents that they would produce in discovery. Lead Counsel also had
25 to bring a contested motion to compel Symantec to produce documents that it produced to the SEC.

1 6. As a result of Lead Counsel’s efforts, the volume of document discovery produced
2 was large, totaling over 2.1 million pages. As described in more detail below, the review and
3 analysis of this extensive document production was critically important to the ability of Lead
4 Counsel to effectively prosecute this Action. Thus, Lead Counsel had to utilize a significant team
5 of attorneys to assist in completing this task.

6 7. Deposition testimony was likewise essential. In that regard, Lead Counsel prepared
7 for and took or defended a total of 29 depositions over the history of the case, including depositions
8 of Lead Plaintiff, numerous former Symantec employees, including Symantec’s former CEO
9 (Defendant Clark), former CFO (Nicholas Noviello) and former COO (Michael Fey), multiple
10 expert witnesses, and non-parties like KPMG and EY. Lead Counsel’s team of attorneys were
11 integral to the preparation of extensive “witness kits” for each deponent.

12 8. Lead Counsel also had to retain and work with multiple subject-matter experts,
13 including an expert forensic accountant, damages experts, and an executive compensation expert.
14 Each of these experts was necessary to Plaintiffs’ effort to prove the Class’s securities fraud claims,
15 which concerned alleged accounting manipulations tied to executive bonus targets and alleged
16 damages suffered by Class members who purchased or otherwise acquired publicly traded
17 Symantec common stock during the Class Period (*i.e.*, May 11, 2017 through August 2, 2018,
18 inclusive). Indeed, Defendants likewise retained and proffered opinions from experts in the fields
19 of accounting, damages, and executive compensation.

20 9. The litigation of this Action was made even more challenging by Defendants’
21 aggressive defense strategy. To prove their case and fulfill their fiduciary duties to the Class,
22 Plaintiffs had to—and did—muster the resources to match the formidable litigation efforts
23 undertaken by the top-notch defense firms hired by Defendants step for step over the course of
24 multiple years until the proposed Settlement was reached.

25 10. In March 2021, with fact and expert discovery completed, Defendants filed an
26 extensive motion for summary judgment seeking to dismiss the Action as presenting no genuine
27

1 issue for trial. Defendants disputed every element of Lead Plaintiff's claims, including falsity,
2 materiality, scienter, loss causation, and damages. Lead Counsel opposed that motion in an
3 extensive opposition brief and many thousands of pages of documents and testimony.

4 11. Given this massive litigation effort undertaken in the face of vigorous opposition
5 and substantial risks, by the time the Parties reached an agreement in principle to resolve this
6 matter in May 2021, Lead Counsel fully understood the strengths and risks of the claims asserted
7 in the Action and the merit of the proposed Settlement. And, also in light of their dedicated
8 litigation effort, Plaintiffs respectfully submit that they adequately—indeed, zealously—
9 represented the Class.

10 12. **The Parties' Extensive Arm's-Length Negotiations Involving Judge Ryu.** The
11 proposed Settlement was reached after Lead Counsel had held two settlement conferences several
12 months apart and engaged in extensive arm's length negotiations—all of which were closely
13 supervised by Magistrate Judge Donna M. Ryu ("Judge Ryu"). The first settlement conference
14 was held on September 14, 2020 by videoconference (due to the COVID-19 pandemic). In
15 advance, the Parties exchanged detailed mediation submissions regarding the strengths and
16 weaknesses of the claims, which were submitted to Judge Ryu, along with separate, private
17 submissions by each side for Judge Ryu's eyes only. Despite a full-day session and several weeks
18 of negotiations, the Parties remained far apart. As such, SEB and Lead Counsel continued to
19 litigate for the next eight months, completing fact and expert discovery and fully briefing
20 Defendants' summary judgment motion.

21 13. On May 24, 2021, the Parties engaged in a second settlement conference before
22 Judge Ryu by video. In advance, the Parties submitted to Judge Ryu their summary judgment
23 papers and each side made additional private submissions regarding the strengths and weaknesses
24 of the claims. After another full day of arm's length negotiations in which Judge Ryu was actively
25 involved, the Parties ultimately agreed to resolve all claims in exchange for a cash payment of \$70
26 million.

1 14. **The Proposed Settlement Is Excellent Given The Significant Risks.** While
2 Plaintiffs filed and prosecuted this Action firmly believing in its merit, we were nevertheless aware
3 of the serious risks faced in the litigation. The proposed Settlement represents an excellent result
4 for the Class given the significant risks and challenges of the Action as well as the substantial costs
5 and delays of continued litigation, including the resolution of Defendants' summary judgment
6 motion, a trial and the inevitable appeals.

7 15. As summarized herein, Plaintiffs faced significant risks on each main element of
8 the securities fraud claims at issue. This Action centered on Lead Plaintiff's allegations that
9 Defendants made materially false and misleading statements to investors regarding Symantec's
10 financial condition and accounting practices, including its reported revenues and T&T expenses.
11 Throughout the litigation, Defendants vehemently denied that Symantec's statements were false,
12 that their accounting was in any way improper, and that investors were entitled to any damages.
13 According to Defendants, Symantec hired outside advisors to investigate a former employee's
14 allegations of improper accounting practices—and those advisors thoroughly investigated the
15 allegations, found no material accounting problems, and recommended minor control
16 enhancements.

17 16. As a threshold matter, the risks inherent in this case are evident from the fact that
18 the Court initially dismissed all of the securities claims at issue on materiality and scienter grounds.
19 *See SEB Inv. Mgmt. AB v. Symantec Corp.*, 2019 WL 2491935, *3-*7 (N.D. Cal., June 14, 2019).
20 In particular, the Court found that Symantec's disclosure that it needed to defer \$12 million in
21 revenue from the fourth quarter of fiscal year 2018 to the next quarter reduced Symantec's "fourth
22 quarter revenues by less than one percent from \$1.222 billion to \$1.210 billion"—which the Court
23 held was "insufficient to show materiality." *Id.* at *5. The Court also ruled that Lead Plaintiff's
24 scienter allegations for the alleged T&T misstatements "fail[ed] to raise an inference that is as
25 compelling as the opposing inference that Symantec simply announced an investigation into, and
26 then thoroughly investigated, a former employee's claims of improper accounting practices, later

1 recommending control enhancements to address those concerns.” *Id.* at *10. Later, when it
2 granted leave to amend and sustained the amended complaint, the Court expressly noted that, at
3 trial or summary judgment, “we will have to decide whether the amounts alleged by plaintiff to
4 have been improperly recognized are material.” *SEB Inv. Mgmt. AB v. Symantec Corp.*, 2019 WL
5 4859099, *3 (N.D. Cal., Oct. 2, 2019).

6 17. The issues that led the Court to initially dismiss the Action continued to present
7 significant risk throughout the entire litigation. Indeed, Lead Counsel worked extensively with an
8 expert accountant—but, aside from the \$12 million in prematurely booked revenue in FY 4Q18,
9 did not identify any other instances where Defendants improperly booked revenue. As such,
10 throughout the entire case, Defendants vehemently argued that Lead Plaintiff’s revenue
11 misstatement allegations could not possibly succeed because no reasonable investor would find
12 the need to defer \$12 million by one quarter to be material to Symantec—a Company that recorded
13 over \$1 billion in revenue per quarter and over \$4 billion in revenue per year.

14 18. Defendants also vigorously disputed Lead Plaintiff’s allegation that they had
15 misclassified ordinary operating expenses as T&T expenses to meet executive compensation
16 targets. Indeed, Defendants insisted that they did not misclassify any expenses at all. For example,
17 in their summary judgment motion, Defendants argued that the T&T allegations failed right out of
18 the gates because Symantec’s accounting staff responsible for T&T classifications had “testified
19 uniformly and unambiguously that th[e] classifications were proper.” *See* ECF No. 291, at 2.
20 Defendants also sought to buttress this argument with an expert accountant—a CPA who had
21 served as Chief Accountant in the Securities and Exchange Commission’s (SEC) Division of
22 Enforcement—who opined that Symantec’s accounting for T&T expenses was consistent with
23 SEC guidance.

24 19. Lead Counsel worked extensively with Plaintiff’s expert accountant to analyze
25 Symantec’s T&T expenses and non-GAAP measures. Based on a detailed review of the
26 documents and testimony, Plaintiffs’ expert identified specific T&T projects totaling \$6.275

1 million in Fiscal Year 2017 and \$52.05 million in Fiscal Year 2018 as being improperly
2 classified—for a total of \$58.3 million. A significant risk on this issue, however, was that
3 Symantec’s total reported non-GAAP operating income, which included T&T expenses, was
4 approximately \$1.2 billion in Fiscal Year 2017 and \$1.7 billion in Fiscal Year 2018. Thus, to help
5 obviate additional attacks on materiality grounds Plaintiffs presented a theory of liability that *all*
6 of Symantec’s reported T&T expenses were misleading to Class members because, contrary to its
7 public statements that these expenses facilitated comparison to its peers, none of Symantec’s peers
8 excluded similar T&T expenses. Defendants and their experts vigorously disputed this assertion,
9 arguing that Symantec fully disclosed that its non-GAAP methods may differ from other
10 companies and, even if misleading, the peer disclosure language was removed early in the Class
11 Period. Again, while Plaintiffs believed in the merits of their T&T allegations, they nonetheless
12 recognize that they faced serious risk. Indeed, it was impossible to predict with any certainty how
13 a jury would decide these issues at trial, or even how the Court would have resolved them at
14 summary judgment.

15 20. Plaintiffs also faced significant risks in proving scienter—*i.e.*, that Defendants
16 knowingly or recklessly deceived investors—which also was a primary ground on which the Court
17 had initially dismissed the Action. In their summary judgment motion, Defendants argued that
18 scienter could only be proved through Symantec’s former CEO, Gregory Clark, because the other
19 individual defendants had been dismissed from the Action. Moreover, according to Defendants,
20 Plaintiffs could not possibly prove Mr. Clark’s knowledge or intent to deceive investors because
21 he did not approve and was not aware of any misclassified T&T expenses, he relied on the
22 Company’s accounting staff to handle such matters and, when issues arose, he promptly tried to
23 address them in good faith, including by hiring outside consultants. Defendants also argued that
24 Symantec had robust processes and procedures to review T&T expenses, including Board-level
25 review as well as examination by its outside auditor, KPMG, and other outside advisors.
26 Defendants further pointed to the conclusion of a full Audit Committee investigation led by outside

1 advisors that, according to Defendants, announced no restatement of historically filed financial
2 statements and did not result in any employment actions against Symantec executives. If
3 Defendants had prevailed on anyone of these serious defenses to liability at summary judgment or
4 trial, the Class would have recovered nothing at all. Instead, the proposed Settlement provides a
5 substantial and certain recovery to Class members without further litigation delays.

6 21. Plaintiffs also faced significant risks to proving loss causation and damages. For
7 example, Defendants insisted that Plaintiffs could not establish a causal connection between the
8 alleged misrepresentations and the loss allegedly suffered by investors. Indeed, Defendants argued
9 that damages were necessarily *zero* because the alleged corrective disclosures on May 10, 2018
10 and August 2, 2018 merely discussed the *existence* of an investigation, without any admission of
11 wrongdoing or correction of the specific alleged misstatements. Defendants also challenged the
12 August 2018 disclosure by contending that it revealed no “new” information about the alleged
13 fraud—and, thus, the alleged fraud could not have caused the price decline that followed. Finally,
14 Defendants would also have raised a number of challenges to the amount of damages that could
15 be proved, including that any gains that the Class Members received from their sale of pre-Class
16 Period shares during the Class Period (while Symantec’s stock price was alleged inflated) should
17 offset (or be “netted” against) the damages they suffered from the purchase of shares in the Class
18 Period. Thus, even if Plaintiffs showed that Defendants made misleading statements, Defendants
19 still could have succeeded on one or more of their numerous arguments challenging loss causation
20 and damages and *still* significantly reduced any recovery for Class members—or even eliminated
21 it entirely.

22 22. And, even if Plaintiffs succeeded in proving liability and damages through
23 expensive and time-consuming summary judgment proceedings and at trial, Defendants almost
24 certainly would have pursued an appeal. Such an appeal would have tied up any recovery for
25 years—and again could have resulted in no recovery at all for Class members.

23. The proposed Settlement provides the Class with a substantial recovery while avoiding the genuine risk that continued litigation could result in significant delay, a much smaller recovery or, even worse, no recovery at all for Class members. Lead Plaintiff strongly endorses the Settlement and believes that it provides an excellent recovery for the Class, particularly in light of these substantial risks. See Declaration of Caroline Rifall on behalf of SEB (“Rifall Declaration”), attached hereto as Exhibit 1, at ¶ 6.

24. Plaintiffs are proud of the hard-fought result obtained in this Action. Set forth below is a description of the history of this Action, a summary of the efforts of Lead Plaintiff and Lead Counsel in achieving the proposed Settlement, and a lengthier description of the risks and challenges posed by the Action.

25. **Lead Counsel’s Fee And Expense Motion.** Also set forth herein are facts that I respectfully submit support Lead Counsel’s motion for an attorney’s fee award of 19% of the proposed Settlement recovery (together with any interest that may be earned thereon), which equates to \$13.3 million (before interest), and for payment of litigation expenses in the amount of \$2,000,208.69. Having achieved a significant recovery after more than three years of litigating on a fully contingent basis in the face of significant risks, I respectfully submit that Lead Counsel’s hard work, skill, persistence, and dedication to pursuing the interests of the Class fully merits the requested 19% fee award. I also note that this requested fee represents a “negative” multiplier” on Lead Counsel’s total collective lodestar, as it would result in an award of just 66% of that lodestar value of the 43,240 hours that Lead Counsel devoted to litigating this case. As such, the requested fee reflects a substantial discount—*i.e.*, a 34% discount—to Lead Counsel’s lodestar.

26. To assist the Court in analyzing Lead Counsel’s fee and expense requests, a detailed explanation of the work performed by Lead Counsel, organized by discrete projects, breaking down all attorney and paraprofessional time sought to be recovered is provided below in paragraphs 194 to 268. Also included are details regarding the qualifications and role of each attorney or professional for whom fees are sought, the normal rate for each during the relevant

1 time period, how the rates compare to prevailing rates in the community for like-skilled
2 professionals and any “billing judgment” adjustments made. Further, I have included details on
3 the litigation expenses incurred by Lead Counsel, including a summary of all expenses incurred
4 by category, with further detail on expert expenses and travel expenses.

5 27. In addition, explained below are the reasons why the Settlement and Plan of
6 Allocation should be finally approved as fair, reasonable, and adequate, and why Lead Counsel’s
7 motion for Litigation Expenses should be approved.

8 **II. HISTORY AND PROSECUTION OF THE ACTION**

9 28. On May 10, 2018, Symantec announced that, in response to concerns raised by a
10 former employee, it had commenced an internal Audit Committee investigation and had
11 voluntarily alerted the SEC.

12 29. On May 17, 2018, this litigation commenced with the filing of a complaint in *Felix*,
13 *et al. v. Symantec Corp., et al.*, No. 3:18-cv-02902-WHA (the “*Felix* Action”) on behalf of
14 investors in Symantec common stock in the United States District Court for the Northern District
15 of California. In a 13-page complaint, the *Felix* Action alleged that, between May 20, 2017 and
16 May 10, 2018, Symantec, Gregory Clark (former CEO) and Nicholas Noviello (former CFO)
17 violated the Securities Exchange Act of 1933 by misleading investors regarding, *inter alia*,
18 Symantec’s “materially weak and deficient” internal controls and false reporting of non-GAAP
19 measures that impact executive compensation, stemming from Symantec’s announcement of an
20 Audit Committee investigation into its accounting practices. ECF No. 1.

21 **A. Plaintiffs’ Extensive Investigation**

22 30. At this time, Plaintiffs began analyzing and researching the securities fraud claims
23 at issue in this litigation. In connection with this investigation, Lead Counsel researched the
24 securities law claims and undertook a detailed review and analysis of a large volume of publicly
25 available information concerning Symantec. For example, Lead Counsel reviewed many
26 thousands of pages of Symantec’s SEC filings, earnings announcements, press releases, transcripts
27 of analyst conference calls, analyst reports and news articles. Lead Counsel also consulted with

1 an expert to analyze the difficult and risky loss causation issues that were presented by the Action.
2 In addition, Lead Counsel's investigators used online resources to locate and contact former
3 Symantec employees with potential information relevant to Lead Plaintiff's and the Class's claims.
4 All told, in connection with drafting two amended complaints, Lead Counsel's investigators
5 reached out to over 640 people and, often together with attorneys, conducted interviews of a total
6 of 155 former Symantec employees.

7 31. This investigation directly benefited the Class. Indeed, as discussed below, Lead
8 Counsel's extensive investigation was critical in getting Lead Plaintiff's claims sustained after the
9 Court had initially dismissed the Action.

10 32. On July 16, 2018, the statutory deadline established under the PSLRA, Lead
11 Plaintiff SEB, as well as several other investors, timely filed motions seeking appointment as lead
12 plaintiff and consolidation of the *Felix* and *Broda* Actions. ECF No. 32.

13 33. While the lead plaintiff appointment and consolidation motions were pending,
14 Symantec filed a report with the SEC after market close on August 2, 2018, which disclosed that
15 the Audit Committee's investigation was "ongoing" and applied to Symantec's reported fourth
16 quarter of fiscal year 2018 results.

17 34. On August 23, 2018, the Court entered an order appointing SEB as Lead Plaintiff
18 pursuant to the Private Securities Litigation Reform Act of 1995, consolidating all related actions,
19 and inviting applications for Lead Counsel. ECF No. 75. After interviewing multiple law firms,
20 Lead Plaintiff selected BLB&G and, on September 27, 2018, filed its motion to appoint BLB&G
21 as Lead Counsel. ECF No. 86. On October 4, 2018, the Court entered an order approving Lead
22 Plaintiff's selection of BLB&G as Lead Counsel. ECF No. 88.

23 35. During this period, Lead Plaintiff and Lead Counsel continued their extensive
24 investigation into the claims and potential claims against Symantec.

25 36. As a result of this investigation, and as discussed below, Plaintiffs significantly
26 expanded the theory of liability alleged in the previously filed complaint. Plaintiffs advanced

1 several new theories, including that, during the Class Period, Defendants had made false and
2 misleading representations concerning the accuracy of Symantec's non-GAAP measures and had
3 instead manipulated Symantec's non-GAAP measures to meet financial targets used to determine
4 senior executive compensation. Plaintiffs also added an additional Defendant—Symantec's
5 former Chief Accounting Officer, Mark Garfield.

6 **B. The Court Dismisses the Consolidated Complaint**

7 37. On November 15, 2018, Lead Plaintiff filed a Consolidated Class Action Complaint
8 For Violations Of The Federal Securities Laws against Symantec Corporation, Gregory S. Clark,
9 Nicholas R. Noviello, and Mark S. Garfield (the "Consolidated Complaint"). ECF No. 103. The
10 Consolidated Complaint asserted claims against Symantec, Clark, Noviello, and Garfield under
11 Section 10(b) of the Exchange Act, as well as Rule 10b-5, against Clark, Noviello, and Garfield
12 under Section 20(a) of the Exchange Act, and against Clark and Noviello under Section 20A of
13 the Exchange Act.

14 38. The 119-page Consolidated Complaint expanded significantly upon the 13-page
15 complaint originally filed in the *Felix* Action, alleging, *inter alia*, that Defendants made material
16 misstatements concealing from investors their manipulation of financial results tied to lucrative
17 executive compensation bonus and equity packages, including the manipulation of Symantec's
18 GAAP and non-GAAP results. The Consolidated Complaint further alleged that the price of
19 Symantec common stock was artificially inflated as a result of Defendants' allegedly false and
20 misleading statements and omissions, and declined when the truth was revealed through two
21 corrective disclosures on May 10, 2018 and August 2, 2018.

22 39. On December 26, 2018, Defendants filed three motions to dismiss, consisting of
23 over 50 pages of briefing and hundreds of pages of exhibits. ECF Nos. 112, 114, 115. Defendants
24 challenged nearly every element of Lead Plaintiff's claims, contending for example that Plaintiffs
25 had failed to plead falsity with specificity, that Plaintiffs' confidential witnesses did not offer
26 credible or meaningful information demonstrating that Defendants made false statements with

1 scienter, that the scienter allegations failed and competing innocent inferences were more
2 compelling and should prevail, and that Plaintiffs had failed to adequately plead loss causation as
3 to the August 2, 2018 corrective disclosure.

4 40. On January 9, 2019, Plaintiffs filed an omnibus opposition to Defendants' motions
5 to dismiss, consisting of 38 pages of briefing. ECF No. 118. In its opposition, Lead Plaintiff
6 vigorously opposed Defendants' arguments, arguing *inter alia* that the confidential witnesses cited
7 in the Consolidated Complaint provided credible accounts of Defendants' misconduct and
8 highlighting important scienter evidence, including the departure of key executives and the ties
9 between Symantec's non-GAAP measures and executive compensation.

10 41. On January 16, 2019, Defendants filed three separate reply briefs in response to
11 Plaintiffs' opposition, urging the Court to find that Plaintiffs had not adequately pled falsity or
12 scienter. ECF Nos. 121, 123, 124.

13 42. On January 31, 2019, the Court held a hearing on Defendants' motions to dismiss
14 the Consolidated Complaint. Lead Counsel and a representative from Lead Plaintiff flew to San
15 Francisco to participate. In advance of that hearing, Lead Counsel engaged in extensive
16 preparation for the oral argument.

17 43. On June 14, 2019, the Court dismissed the Consolidated Complaint and all of Lead
18 Plaintiff's securities fraud claims in their entirety. *See SEB Inv. Mgmt. AB v. Symantec Corp.*,
19 2019 WL 2491935, *3-*7 (N.D. Cal., June 14, 2019). The Court dismissed Lead Plaintiff's
20 revenue misstatement allegations, which centered on Symantec's disclosure that \$12 million in
21 revenue had been prematurely booked in FY 4Q18 and had to be deferred to FY 1Q19. In doing
22 so, the Court explained that "the deferral of only \$12 million from the fourth quarter of fiscal year
23 2018 to the first quarter of fiscal year 2019" reduced Symantec's "fourth quarter revenues by less
24 than one percent from \$1.222 billion to \$1.210 billion"—which was "insufficient to show
25 materiality." *Id.* at *5. The Court also held that Lead Plaintiff's scienter allegations for the alleged
26 T&T misstatements "fail[ed] to raise an inference that is as compelling as the opposing inference

1 that Symantec simply announced an investigation into, and then thoroughly investigated, a former
2 employee's claims of improper accounting practices, later recommending control enhancements
3 to address those concerns." *Id.* at *10.

4 44. The Court also ordered that Lead Plaintiff could file a motion within 35 days
5 "seeking leave to file an amended pleading that might save its claims" that "clearly explain[ed]
6 how the amendments cure the deficiencies identified in this order." *Id.* at 11. The Court noted
7 that "Plaintiff should plead its best case." *Id.*

8 **C. The Court Grants Plaintiffs' Motion for Leave to Amend After Extensive**
9 **Briefing And Efforts To Obtain Symantec Board Minutes In A Related Case**

10 45. While the Court's motion to dismiss opinion was pending, Lead Counsel continued
11 the investigation into Symantec and the alleged accounting manipulations, which later proved
12 helpful given the 35-day deadline to file for leave to amend. After the Court's dismissal opinion,
13 Lead Counsel significantly increased its efforts to address the Court's concerns and plead the best
14 case. As part of this investigation, Plaintiffs sought to unseal documents in a related derivative
15 matter, ECF No. 139, conducted numerous additional interviews of former Symantec employees—
16 which as noted cumulatively totaled 155 interviews—and reviewed and analyzed additional
17 Symantec filings, analyst reports, and media publications.

18 46. On June 17, 2019, the Court granted Symantec's motion to relate a derivative case
19 captioned *Lee v. Clark et al.*, Case No. 4:19-cv-02522-KAW (the "Derivative Action") to this
20 Action. ECF No. 138. The complaint in the Derivative Action was largely modeled on Plaintiffs'
21 Consolidated Complaint, but contained additional facts elicited from documents that Defendants
22 had produced to the plaintiffs in the Derivative Action, but not Lead Plaintiff or Lead Counsel.

23 47. On June 25, 2019, Plaintiffs filed an administrative motion seeking to unseal the
24 complaint filed in the Derivate Action. *See* ECF No. 139. On July 1, 2019, Defendants opposed
25 that motion. ECF No. 142.

26 48. The Court denied the motion to unseal on July 3, 2019—on the ground that Lead
27 Plaintiff was not a party to the Derivative Action. ECF No. 144. However, also on July 3, 2019,

1 the Court nevertheless *did* order the unsealing of many of the redacted portions of the complaint
2 filed in the Derivative Action (the “Unsealing Order”). *See Lee v. Clark et al.*, Case No. 4:19-cv-
3 02522-KAW at ECF No. 23. The Court set a deadline of July 18, 2019 for the plaintiffs in the
4 Derivative Action to file a revised and unsealed version of the Derivative Complaint and set a
5 deadline of July 11, 2019 for Defendants to seek an emergency appeal of the Unsealing Order. *Id.*

6 49. On June 28, 2019, Plaintiffs filed a motion seeking a partial lift of the PSLRA
7 discovery stay to allow Plaintiffs access to the documents, including Board minutes, that
8 Defendants had produced to the plaintiff in the Derivative Action and which were cited in the
9 complaint filed in that action. *See* ECF No. 140. On July 12, 2019, Defendants opposed Plaintiffs’
10 lift-stay motion. ECF No. 146. Because the Court ultimately did order the unsealing of the
11 complaint in the Derivative Action, Plaintiffs withdrew this motion to lift the PSLRA stay on July
12 17, 2019. ECF No. 148.

13 50. On July 11, 2019, Lead Plaintiff filed its motion for leave to amend along with an
14 extensive First Amended Complaint (“FAC” or the “Complaint”). ECF No. 145. Because
15 Defendants would not consent to an extension of Plaintiffs’ deadline to file the motion for leave,
16 Plaintiffs noted that they intended to seek leave to further amend the FAC when the Derivative
17 Complaint was filed in the unsealed form to incorporate any new facts supporting Lead Plaintiff’s
18 claims.

19 51. Then, on July 23, 2019, after the unsealed complaint in the Derivative Action was
20 publicly filed, Plaintiffs filed an *amended* motion for leave to amend. ECF No. 150. Plaintiffs
21 attached a further revised FAC, as well as a redline comparing the Complaint to the Consolidated
22 Complaint.

23 52. The FAC sought to remedy the scienter deficiencies previously identified by the
24 Court, including by alleging:

- 25 (i) Defendant Clark personally knew of and approved specific transition costs at issue
26 in the Action;

- 1 (ii) Defendants were focused on and personally involved in discussions held at the level
2 of Symantec’s Board and Audit Committee concerning, *inter alia*, non-GAAP
3 adjustments, “transition costs” and the accounting for those costs, and “errors in
4 financial reporting and recording,” including “significant” deficiencies related to
5 and misstatements in Symantec’s Fiscal Year (“FY”) 2017 10-K;
6
7 (iii) Defendants Clark and Noviello acknowledged the need to “enhance” Symantec’s
8 “policies and procedures regarding non-GAAP measures,” and went so far as to
9 retain Ernst & Young (“EY”) to address issues with respect to its “usage, policies,
10 and controls related to [non-GAAP measures]”;
11
12 (iv) Defendants Clark and Noviello left Symantec shortly after the Class Period under
13 “suspicious circumstances”; and
14
15 (v) Broadcom had recently lowered its price for Symantec by \$1 billion in the middle
16 of due diligence.

17 53. The FAC also sought to remedy the materiality deficiencies identified by the Court,
18 including by alleging new facts establishing the existence and materiality of the revenue
19 recognition violations, which collectively demonstrated that Defendants’ tactics to inflate revenue
20 totaled an estimated \$103 million at a minimum and were otherwise “widespread and significant.”
21 The FAC also explained that the \$12 million in revenue that Defendants admitted was improperly
22 recorded in Q4 2018 was approximately 20% of Symantec’s operating income for 2018, which
23 Symantec admitted was a “key metric.”

24 54. In addition, the Complaint included additional details concerning Defendants’
25 misconduct provided by former Symantec employees in connection with the multitude of
26 interviews that Lead Counsel conducted, including information concerning an estimated \$63
27 million in allegedly “double-booked” deals, and additional information concerning \$28 million in
28 alleged revenue recognition violations.

55. On July 25, 2019, Defendants filed three opposition briefs, which responded to
Plaintiffs’ *initial* motion for leave to amend. ECF Nos. 152, 154, 155. These briefs argued *inter
alia* that Lead Plaintiff had failed to adequately plead scienter and materiality, and that the
proposed amendments were futile.

56. On July 26, 2019, Defendant Symantec filed an administrative motion to “Strike or Disregard” Plaintiffs’ amended motion for leave. ECF No. 156. On July 29, 2019, the other defendants named in the FAC joined in the motion to strike. ECF Nos. 157, 159.

57. Also on July 29, 2019, Plaintiffs filed an opposition to Symantec’s motion to strike the amended motion for leave. ECF No. 158.

58. On July 31, 2019, the Court denied Defendants’ motion to strike, holding that “lead plaintiff has been reasonable in amending its motion to file a new and different amended complaint.” ECF No. 161. The Court also set a new schedule for the remainder of briefing on the amended motion for leave. *Id.*

59. On August 15, 2019, Defendants filed their opposition to the amended motion for leave. ECF No. 172. On August 22, 2019, Plaintiffs filed reply papers. ECF No. 174.

60. The Court heard oral argument on the motion for leave to amend on September 26, 2019. In advance of that hearing, Lead Counsel engaged in extensive preparation for the oral argument.

61. On October 2, 2019, the Court granted Lead Plaintiff’s motion for leave to amend, sustaining claims under Section 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”) against Symantec and Clark and Section 20(a) control person and Section 20A insider trading claims against Clark. *See SEB Inv. Mgmt. AB v. Symantec Corp.*, 2019 WL 4859099, *3-5 (N.D. Cal., Oct. 2, 2019). However, the Court dismissed as defendants Symantec’s former Chief Financial Officer (Nicholas Noviello) and former Chief Accounting Officer (Mark Garfield), as well as alleged misrepresentations concerning the integration of the Symantec and Blue Coat companies. *Id.* at *4-6. Further, even while sustaining aspects of the FAC, the Court noted that, at trial or summary judgment, “we will have to decide whether the amounts alleged by plaintiff to have been improperly recognized are material.” *Id.* at *3.

62. On October 11, 2019, Lead Plaintiff filed the operative complaint in the Action, the First Amended Consolidated Class Action Complaint for Violations of Federal Securities Laws

(the “FAC” or the “Complaint”)—after conforming it to the Court’s October 2, 2019 order granting leave to amend. ECF No. 183. The Complaint asserts claims against Defendants Symantec and Clark under Section 10(b) and Rule 10b-5 promulgated thereunder, and against Defendant Clark under Sections 20(a) and 20A of the Exchange Act. Among other things, the Complaint alleges that, during the period from May 11, 2017, to August 2, 2018, inclusive (the “Class Period”), Defendants Symantec and Clark made materially false and misleading statements concerning the Company’s financial results, and Defendant Clark engaged in improper insider trading by selling shares of Symantec common stock while in possession of material, non-public information. The Complaint further alleges that Defendants’ alleged misstatements caused the price of Symantec common stock to be inflated during the Class Period and to decline when the alleged truth emerged though corrective disclosures on May 10, 2018 and August 2, 2018, resulting in financial losses to those who purchased the stock at the inflated price. On November 7, 2019, Defendants filed Answers to the FAC, which denied Lead Plaintiff’s claims and asserted various defenses. ECF Nos. 185, 186.

63. On February 13, 2020, the Court held a Case Management Scheduling Conference, which Lead Counsel prepared for and attended in person. On February 14, 2020, the Court entered the Case Management Order and Reference to Magistrate Judge for Mediation/Settlement (the “Scheduling Order”) (ECF No. 204), which *inter alia* set the trial schedule for the Action and referred the case to Magistrate Judge Donna M. Ryu for mediation/settlement. Prior to the Scheduling Conference, Plaintiffs had worked with Defendants to file two Joint Case Management Statements on November 29, 2019 and February 6, 2020. ECF Nos. 191, 203. Plaintiffs and Defendants also submitted a proposed Protective Order (ECF No. 192), which the Court approved subject to stated conditions on December 3, 2019. ECF No. 193.

D. Lead Plaintiff’s Motion for Class Certification

64. Class certification in this case was hotly contested. Plaintiffs filed, and responded to, extensive briefing, took and defended three (3) depositions, and filed or analyzed three (3)

1 substantial expert reports in connection with their Motion to Certify. ECF Nos. 197-8, 219-3.
2 Given Defendants' vigorous opposition to certification, Lead Counsel had to devote significant
3 resources and skill to preparing and defending Lead Plaintiff's motion.

4 65. On January 17, 2020, Lead Counsel filed Lead Plaintiff's opening motion for class
5 certification, which included a 47-page market efficiency report prepared by its expert financial
6 economist, Dr. Michael Hartzmark. ECF No. 197. Lead Plaintiff sought to certify a class
7 consisting of "[a]ll persons or entities who purchased or otherwise acquired publicly-traded
8 Symantec common stock during the period from May 11, 2017 to August 2, 2018, inclusive (the
9 "Class Period"), and who were damaged thereby." *Id.*

10 66. Defendants issued document requests to Lead Plaintiff in connection with the
11 Motion to Certify. Lead Plaintiff, with Lead Counsel's assistance, responded to these document
12 requests by: preparing and serving responses and objections to the requests; engaging in multiple
13 meet-and-confers and exchanging discovery correspondence with Defendants; and producing over
14 4,000 pages of documents, which Lead Counsel reviewed for privilege and relevance.

15 67. In February 2020, Caroline Rifall, Head of Legal at SEB, flew from Sweden to be
16 deposed on behalf of Lead Plaintiff. Ms. Rifall was deposed by Defendants on February 5, 2020.
17 Lead Counsel's litigation team was critical in assisting with the extensive preparation required for
18 this deposition.

19 68. On February 7, 2020, Lead Counsel attended and defended the deposition of Dr.
20 Michael Hartzmark, noticed by Defendants, in Miami, Florida. Lead Counsel's litigation team
21 provided essential help in preparing Dr. Hartzmark for his deposition and identifying the issues on
22 which Defendants would likely cross-examine Dr. Hartzmark.

23 69. On February 14, 2020, Defendants filed voluminous papers in opposition to Lead
24 Plaintiff's motion for class certification, including 21 exhibits. ECF Nos. 207-208. Defendants
25 also filed an expert report from Dr. Douglas Skinner, which attempted to rebut Dr. Hartzmark's
26 report. *Id.* Among other things, Defendants argued that Lead Plaintiff's motion should be denied

1 in its entirety because Lead Plaintiff could not demonstrate price impact on the second alleged
2 corrective disclosure (*i.e.*, August 2, 2018), could not proffer a damages methodology consistent
3 with its theories of liability, and Lead Plaintiff's trading pattern rendered it inadequate and
4 atypical.

5 70. Lead Counsel noticed and then, on March 6, 2020, deposed Defendants' expert, Dr.
6 Skinner, in Chicago, Illinois. Lead Counsel's litigation team was again critical in assisting with
7 the extensive preparation required to depose Dr. Skinner.

8 71. On or about March 11, 2020, the World Health Organization declared the
9 increasing spread of the COVID-19 virus to be a pandemic. Over the next few weeks, much of
10 the United States—indeed, the world—shut down and/or began quarantining in earnest. As a
11 result, Lead Counsel had to work remotely for the duration of the litigation, which complicated
12 and made more difficult numerous tasks, including for example preparing for and taking
13 depositions.

14 72. On March 13, 2020, Plaintiffs filed detailed, thoroughly researched reply papers
15 responding to Defendants' opposition to class certification. ECF No. 219. These reply papers
16 included, among other things, a rebuttal expert report prepared by Dr. Hartzmark. Preparing Lead
17 Plaintiff's reply to Defendants' voluminous, wide-ranging class certification opposition was a
18 significant undertaking requiring substantial time, effort, and resources.

19 73. On March 20, 2020, Defendants filed an administrative motion for leave to file a
20 sur-reply. ECF No. 221. Plaintiffs opposed that motion on March 23, 2020. ECF No. 222.

21 74. Lead Plaintiff's class certification motion was scheduled for a hearing on April 9,
22 2020. Given the intervening COVID-19 pandemic, the Court had vacated all in-court civil
23 hearings for several weeks. The Court also developed a procedure whereby, two days prior to a
24 previously set hearing date, it would issue a notice setting a telephonic hearing on the original
25 hearing date if "the Court determine[d] that oral argument will aid resolution of a pending matter."
26 *See, e.g.*, ECF No. 226. As such, Lead Counsel had to prepare for a hearing on the class

1 certification in case it would proceed on April 9, 2020. On April 7, 2020, the Court issued a minute
2 order vacating the April 9 hearing on class certification.

3 75. On May 8, 2020, the Court issued an Order certifying the proposed Class in full,
4 appointing SEB Investment Management AB as Lead Plaintiff for the certified Class, and
5 appointing BLB&G as Class Counsel. ECF No. 227. The Court also denied Defendants'
6 administrative motion to file a sur-reply. *Id.*

7 76. Over the next few weeks, the Parties negotiated a notice to potential Class members
8 as well as a stipulation and proposed order, which was agreed and submitted to the Court on May
9 28, 2020. As discussed below, at the same time, Lead Counsel was conferring with Defendants
10 regarding Symantec's production here of the documents that it provided to the SEC, which
11 culminated in Plaintiffs' filing a contested motion to compel. ECF No. 231; *see also infra*.

12 77. On May 29, 2020, the Court approved the Parties' stipulation and proposed order
13 regarding dissemination of notice to potential Class Members (the "Class Notice") to notify them
14 of, among other things: (i) the Action pending against Defendants; (ii) the Court's certification of
15 the Action to proceed as a class action on behalf of the Class; and (iii) their right to request to be
16 excluded from the Class, the effect of remaining in the Class or requesting exclusion, and the
17 requirements for requesting exclusion (the "Notice Order"). ECF No. 243.

18 78. Beginning in June 2020, the Class Notice was disseminated to potential Class
19 Members. *See* ECF No. 256. Over 126,000 copies of the Class Notice were mailed to potential
20 Class Members and 49 requests for exclusion were received in connection with that notice. *Id.*³

21 **E. Plaintiffs' Extensive Discovery Efforts**

22 79. Discovery in this case was both extensive and hard-fought. Plaintiffs alleged
23 Exchange Act claims arising from facts relating to significant aspects of Symantec's accounting

24
25 ³ A Supplemental Class Notice was mailed to potential Class Members beginning on May 7, 2021,
26 which provided Class Members with a second opportunity to request exclusion from the Class by
27 July 2, 2021. *See* ECF No. 397. A total of 162,865 copies of the Supplemental Class Notice were
28 mailed to potential Class Members and 72 additional Class Members requested exclusion in
connection with the Supplemental Class Notice. *See id.*

1 for large swaths of its business during the Class Period, including revenue recognition practices
2 and T&T expenses. Accordingly, Plaintiffs needed to develop an extensive record to prove their
3 claims at trial and used every means at their disposal to do so, including propounding extensive
4 document requests and interrogatories, subpoenaing multiple third parties, deposing 20 fact
5 witnesses, and retaining and working with numerous subject-matter experts relevant to the Action.

6 80. Throughout discovery, Lead Counsel were actively engaged with experts in
7 financial economics, accounting, and executive compensation—who helped them develop
8 Plaintiff's liability theories and to prepare the case for presentation to a jury.

9 81. As a result, from the time discovery began in November 2019 to the time the
10 proposed Settlement was negotiated, Plaintiffs developed a voluminous and detailed factual record
11 and understood their case—its strengths and its weaknesses—extremely well.

12 **1. Lead Counsel's Litigation Team**

13 82. Throughout this litigation, Lead Counsel took extreme care to ensure that the
14 staffing was lean and that costs and lodestar were minimized without negatively impacting the
15 prosecution of the Action.

16 83. Defendants hired top defense law firms to defend them in this lawsuit, including
17 Wilson Sonsini Goodrich & Rosati for Symantec and Morgan, Lewis & Bockius for Defendant
18 Clark. These defense firms assembled an army of partners, counsel, and associates to defend the
19 Action. And those were only the most visible members of Defendants' legal teams. They each
20 had untold numbers of additional attorneys working behind the scenes.

21 84. As such, Lead Counsel had to assemble a legal team that could match Defendants'
22 well-funded and formidable defense teams, while still litigating efficiently and economically. The
23 primary team members involved in prosecuting the Action from Lead Counsel included attorneys
24 Salvatore Graziano, Jeremy Robinson, Rebecca Boon, Rich Gluck, Julia Tebor, and Ryan
25 Dykhouse. Other attorneys from Lead Counsel also worked on the case and assisted with specific
26
27

1 aspects of the litigation. A description of the qualifications and experience, the role in this
2 litigation and information concerning the rates of each attorney is included in Exhibit 5.

3 85. In addition, Lead Counsel assembled a team of additional senior staff and staff
4 attorneys for the extremely time-intensive and critical tasks of reviewing, analyzing, and digesting
5 the large volume of complex documents produced in the case as well as preparing for depositions.
6 As discussed below, Lead Counsel's staff attorneys primarily focused on discovery and
7 depositions, reviewing, coding, and analyzing electronically produced documents and preparing
8 for depositions—including throughout each of the class certification, fact and expert discovery
9 phases of this litigation. To avoid any doubt, Lead Counsel's staff attorneys did more than merely
10 code documents or engage in rote word searches. They were integrally involved in the front lines
11 of analyzing Defendants' and non-parties' document productions, finding information about
12 Symantec's key employees and external advisors as well as its internal accounting policies,
13 practices and procedures. Scouring the voluminous productions for these types of information and
14 locating and following-up on that information was a critical aspect of Plaintiffs' prosecution of
15 this Action.

16 86. Another of our staff attorneys' core contributions was to assist in the preparation
17 for the numerous depositions taken in the Action. In that regard, our staff attorneys performed
18 extensive searches to find useful witnesses to depose and then prepared detailed "witness kits" for
19 each witness deposed in the case, including both fact and expert witnesses. These deposition
20 witness kits typically consist of approximately 150-200 documents as well as a detailed index
21 describing the documents and a legal memorandum analyzing the materials and proposing key
22 documents for the deposition and areas of potentially fruitful examination.

23 87. These witness kits required the staff attorneys to have detailed familiarity with the
24 issues in the case and the federal securities laws, and their preparation involved extensive analysis
25 of the facts and the witness, as well as the exercise of significant critical judgment in deciding
26 which of the myriad documents to include for potential use with a deposition witness. In preparing

1 the deposition witness kits, the staff attorneys became, in effect, subject matter experts on a
2 particular witness and, working closely with the attorneys taking the depositions, they would
3 contribute significantly to the preparation and conduct of the examination of the witness.

4 88. By assembling a team of well-credentialed, experienced, and trusted staff attorneys
5 who in many cases already had proven themselves in other work for Lead Counsel, Lead Counsel
6 ensured that they could devote talented attorneys to the critical tasks of analyzing documents and
7 preparing for depositions (as well as other tasks) while minimizing eventual lodestar. These
8 attorneys dedicated themselves full time to the prosecution of the Action, working incredibly hard
9 to develop institutionalized and sophisticated knowledge of complex facts. They were critical in
10 allowing Lead Counsel to litigate against the team of highly talented defense lawyers that
11 Defendants assembled to defend the Action.

12 **2. Lead Counsel's Extensive Document Discovery Efforts**

13 89. The Parties commenced fact discovery in November 2019. Lead Counsel prepared
14 extensive document requests directed to each Defendant, which totaled 35 main requests, including
15 multiple subparts, which Defendants characterized as "112 broad requests for production." ECF
16 No. 236 at 2. Over the next several months, Lead Counsel spent significant time proposing search
17 terms, time periods, and custodians and negotiating the scope of discovery with Defendants.
18 Relatedly, Plaintiffs also spent considerable time and effort pressing Defendants to produce all
19 relevant documents.

20 90. In May 2020, Lead Counsel filed and argued a contested discovery motion
21 concerning Symantec's production of documents to the SEC. ECF Nos. 231-41. After a telephonic
22 hearing, the Court ordered that "Symantec must produce the documents from the SEC
23 investigation subject to the procedure described on the record." ECF No. 237. As such, Plaintiffs
24 were successful in obtaining a significantly broader production than Defendants had previously
25 been willing to agree to.

91. Pursuant to extensive discussions, Lead Counsel also negotiated with Symantec a broad production from its Audit Committee investigation materials, including the Audit Committee's presentations to the SEC, all compilations of documents provided to the SEC and many additional documents.

92. Lead Counsel also subpoenaed a total of 12 non-parties for documents, including two whistleblowers, Symantec's outside auditor (KPMG) and its accounting consultant (EY). Lead Counsel also engaged in extensive negotiations over search terms, custodians, and time frames for production concerning many of these subpoenas. The full list of non-parties that Lead Counsel subpoenaed in this Action included:

1. KPMG (Symantec's outside auditor)
2. EY (outside accounting consultant hired by Symantec)
3. Mark Garfield (Symantec's former Chief Accounting Officer)
4. Madeline Wolf (née Gatto) (Symantec's former Vice President, Finance and Corporate Controller)
5. McDermott Will & Emery LLP (outside advisor to Symantec's Audit Committee, engaged to conduct Audit Committee investigation)
6. Mercer LLC (outside advisor to Symantec regarding executive compensation plans)
7. Michael Fey (Symantec's former President and Chief Operating Officer)
8. FE1 (former Symantec employee #1)⁴
9. FE2 (former Symantec employee #2)⁴
10. Nicholas Noviello (former Symantec Chief Financial Officer)
11. PwC (outside advisor to Symantec's Audit Committee, engaged to assist with Audit Committee investigation)
12. Chris Kearney (former Regional Vice President of Sales at Symantec)

⁴ On August 9, 2021, the Court ordered that "FE1 and FE2 may proceed by their monikers in all filings." See ECF No. 400 (granting motions to proceed pseudonymously).

1 93. As a result of these efforts, Defendants and third parties produced more than 2.1
2 million pages in total in discovery. Moreover, Lead Counsel continued to scour all publicly
3 available sources—SEC filings, news and scholarly articles, analyst reports, etc.—for relevant and
4 helpful information. In addition, Plaintiffs also reviewed materials generated and produced by
5 Defendants’ experts.

6 94. Lead Counsel’s litigation team developed a detailed process for reviewing
7 documents produced in the litigation (and discovered through independent investigation) and
8 sharing information among counsel and experts. Lead Counsel developed manuals and guidelines
9 for the review of documents, and prepared chronologies of events and lists of key players. These
10 materials, which were updated and refined as document discovery continued, were provided to the
11 attorneys responsible for reviewing the documents. Further, Lead Counsel held regular training
12 sessions to review substantive issues in the case and ensure that new developments were shared
13 widely across the team.

14 95. In reviewing the documents, Lead Counsel’s attorneys were tasked with making
15 several analytical determinations as to the documents’ importance and relevance. Specifically,
16 they determined whether the documents were “hot,” “relevant,” or “irrelevant.” They also
17 identified particular issues implicated by a document—such as whether the document implicated
18 Symantec’s T&T cost classifications or revenue recognition practices—and created tags in the
19 database to identify potential deponents with respect to whom the document would be relevant so
20 that the document could be easily retrieved when preparing for the depositions of those employees.

21 96. For documents identified as “hot,” the attorneys typically explained their
22 substantive analysis of the document’s importance. Specifically, the attorneys made electronic
23 notations within the document review system explaining what portions of the document were hot,
24 how they related to the issues in the case, and why the attorney believed that information to be
25 significant.

1 97. Lead Counsel also held regular meetings to review and discuss documents of
2 particular significance as a group, as well as additional meetings to prepare for upcoming
3 depositions. To distill the document review, attorneys prepared issue and witness memoranda,
4 collected key supporting documents, and prepared detailed descriptive document indexes.

5 98. Moreover, as discussed above, Defendants requested documents from Lead
6 Plaintiff pursuant to its 30(b)(6) deposition subpoena of Lead Plaintiff's representative. Plaintiffs
7 prepared responses and objections to these requests and extensively negotiated with Defendants
8 over the scope of the production. Lead Plaintiff devoted significant resources to searching its
9 databases, over several custodians, for a lengthy Class Period, to collect relevant documents. Lead
10 Counsel then carefully reviewed these documents for privilege and relevance using the same
11 detailed process outlined above. Ultimately, Lead Plaintiff produced over 4,000 pages of
12 documents to Defendants.

13 **3. Lead Counsel Propounded And Responded To Extensive Written**
14 **Discovery Requests**

15 99. Lead Counsel also served and responded to lengthy interrogatories and requests for
16 admission. In that regard, Plaintiffs propounded two sets of interrogatories on Defendants on
17 November 25, 2020 and December 9, 2020, respectively. Among other things, these
18 interrogatories requested information about Symantec's classification of expenses for specific
19 transactions, asked Symantec to explain restructuring costs concerning specific transactions, and
20 asked details of how Symantec responded to EY's evaluation of Symantec's T&T cost
21 classification practices. Plaintiffs engaged in numerous meet-and-confers with Defendants
22 concerning the interrogatories, and, in early January 2021, Defendants served responses that
23 provided information that ultimately assisted Plaintiffs and Plaintiffs' accounting expert.

24 100. Defendants also propounded three sets of broad contention interrogatories to Lead
25 Plaintiff. The Parties vigorously disputed whether, when, and how Plaintiffs were required to
26 respond to many of these interrogatories, and, again, Plaintiffs spent time and effort on exchanging
27

1 with Defendants correspondence as well as numerous meet-and-confers in an effort to resolve their
2 dispute before seeking Court intervention.

3 101. Plaintiffs served responses to all three sets of interrogatories, totaling over 110
4 pages. Plaintiffs later amended their responses and objections to Symantec's first set of
5 interrogatories and provided a 107-page response to that first set of interrogatories alone.

6 102. Defendants also propounded 14 requests for admissions from Lead Plaintiff, and
7 Plaintiffs responded and objected to each request. Again, the Parties vigorously disputed
8 Plaintiffs' obligations in connection with these requests and had several written and telephonic
9 exchanges in order to narrow their dispute.

10 103. On November 25, 2020, Plaintiffs also served three highly tailored requests for
11 admissions on Defendants, to which Defendants responded.

12 **4. Lead Counsel Prepared For And Took Numerous Depositions**

13 104. Depositions factored significantly in Plaintiffs' discovery efforts. The Parties
14 agreed to a deposition limit of 120 hours of lay witness testimony, with no more than 20 fact
15 depositions in total. The broad factual scope of this case required Lead Counsel to prepare
16 extensively for these depositions and develop a facility with Symantec's highly technical
17 accounting practices. Moreover, Defendants' counsel were particularly active at several
18 depositions in this case, cross-examining witnesses and passing the witnesses back to Lead
19 Counsel for additional questioning. It was not unusual for single-day depositions in this case to
20 extend well into the evening.

21 105. It is also important to note that all of this was made significantly more time-
22 consuming and complicated due to the nationwide quarantine caused by the COVID-19 pandemic.
23 In that regard, Lead Counsel had to prepare and negotiate with Defendants an extensive protocol
24 to allow depositions to occur remotely. The Court entered the Parties' remote deposition protocol
25 on July 21, 2020. ECF No. 251.

1 106. In preparing for the deposition phase of the case, Lead Counsel developed a detailed
2 deposition plan. As part of their comprehensive document review, Lead Counsel's attorneys
3 prepared dozens of witness memoranda and document compendia, and held numerous meetings
4 over several weeks to identify key witnesses in the case and correlate anticipated testimony to
5 prove the elements of their claims. Lead Counsel carefully evaluated the merits of each witness
6 as a deposition target and a final deposition plan was formulated and implemented.

7 107. Lead Counsel then began the process of negotiating a deposition schedule with
8 Defendants.

9 108. In all, Lead Counsel took or defended 29 depositions, including 3 class
10 certification-related depositions, 20 depositions of fact witnesses and 6 depositions of expert
11 witnesses. After March 2020, the 26 fact and expert witness depositions took place remotely due
12 to the ongoing COVID-19 pandemic.

13 109. Between October 2020 and January 2021 alone, Lead Counsel lead or actively
14 participated in depositions of 19 fact witnesses, including taking the depositions of Symantec's
15 most senior officers—its former CEO (Defendant Clark), former CFO (Noviello), and former
16 COO (Garfield). In addition to these executives, Lead Counsel deposed other senior executives
17 and employees of Symantec, including a former director at Symantec, the two whistleblowers, and
18 key third parties, including EY, who Symantec retained to evaluate its accounting practices, and
19 Symantec's outside auditor, KPMG. Given the importance of witness testimony in this case, it
20 was critical for Lead Counsel to devote the significant time, effort, and resources that it did in
21 preparing for each of these depositions.

22 110. Below in paragraphs 224-243, 245, 247, and 249-252, Lead Counsel has provided
23 a more detailed discussion of each deposition, including the time spent on each deposition.

24 **5. The Parties' Extensive Expert Discovery**

25 111. The complex subject matter of this Action required Plaintiffs to retain several
26 subject-matter experts. Symantec engaged in complex and unique accounting practices in
27

1 classifying its expenses and revenue throughout the Class Period, and Lead Counsel had to develop
2 its own accounting expertise to explain the complexities of Symantec's accounting practices and
3 compensation structure to the Court and, eventually, to the jury.

4 112. Plaintiffs retained well-credential experts sufficient to rise to the challenge posed
5 by Defendants. In that regard, Lead Counsel hired and worked with a total of three testifying
6 experts, as well as the teams supporting them, on the following subjects:

- 7 (a) an expert accountant, who opined on, among other things, GAAP; non-GAAP
8 accounting; revenues and T&T costs; and Symantec's financial statements and
9 disclosures, accounting, and internal controls;
- 10 (b) a damages expert, who opined on damages and loss causation; and
- 11 (c) an executive compensation expert, who opined on executive compensation
12 practices in the industry and the connection between Symantec's accounting
13 practices and its compensation incentives.

14 113. Defendants retained similarly well-credentialed experts in response to Plaintiffs'
15 merits experts, hiring a rebuttal expert in the three areas identified by Plaintiffs.

16 114. Lead Counsel expended significant resources in retaining, compensating, and
17 assisting these experts both throughout discovery and specifically in preparing six merits expert
18 reports—three opening reports and three reply reports. Lead Counsel also worked with each expert
19 to prepare them for their depositions, all of which happened over the course of two weeks.

20 115. Defendants filed three rebuttal reports in response to Plaintiffs' opening expert
21 reports, and Lead Counsel devoted significant resources to quickly reviewing these reports and
22 deposing each of Defendants' experts.

23 116. All experts were deposed during the same two-week period—for a total of 6 expert
24 depositions. Lead Counsel's litigation team provided critical assistance in preparing deposition
25 kits and identifying key issues to focus on in taking or defending each expert deposition.

1 117. Prior to producing the formal expert reports, Lead Counsel also consulted with and
2 worked extensively with Lead Plaintiff's experts—in particular its accounting expert—in
3 analyzing Defendants' and non-parties' document productions in an effort to build evidence to
4 prove Plaintiffs' claims.

5 118. In addition to the above, Lead Counsel retained and worked with a consulting
6 expert economist to assist in analyzing damages in connection with the initial investigation, as well
7 as the two settlement conferences and settlement negotiations supervised by Judge Ryu.

8 **F. Defendants' Motion for Summary Judgment**

9 119. On March 4, 2021, Defendants filed their motion for summary judgment, which
10 included declarations from Defendant Clark, former CFO Noviello, and 128 additional exhibits.
11 ECF Nos. 291-300.

12 120. Lead Plaintiff filed its opposition to summary judgment on March 18, 2021, which
13 included 114 exhibits. ECF Nos. 323-339, 345-348.

14 121. Defendants filed their reply on March 25, 2021, which included 17 additional
15 exhibits. ECF Nos. 360-361.

16 122. All told, the Parties' papers on summary judgment included 130-pages of briefing
17 and several thousands of pages of exhibits. Lead Counsel alone filed 50-pages of opposition
18 briefing together with 126 exhibits totaling over 5,000 pages of documents.

19 123. On March 24, 2021, the Court set the hearing date on Defendants' motion for
20 summary judgment as May 6, 2021 (continuing the date from an earlier scheduled date in April).
21 ECF No. 359. The Court later continued the hearing date to July 7, 2021. ECF No. 388.

22 124. Prior to the Court's order continuing the summary judgment hearing date to July,
23 Lead Counsel had to, and did, spent significant time preparing for the hearing. Also, at the Court's
24 request, Lead Counsel spent time preparing an electronic version of Plaintiff's summary judgment
25 opposition papers (as did Defendants).

1 **III. THE SETTLEMENT NEGOTIATIONS AND TERMS OF THE**
2 **SETTLEMENT**

3 125. In the Scheduling Order, the Court referring the case to Judge Ryu for
4 mediation/settlement. ECF No. 204 at 5. On February 20, 2020, Judge Ryu issued a notice
5 convening a pre-settlement conference call to discuss timing and preparation for an in-person
6 settlement conference. ECF No. 214. After several planning/preparation calls, including Zoom
7 calls given the intervening pandemic, the Parties and Judge Ryu scheduled a settlement conference
8 for September 14, 2020 by videoconference.

9 126. In advance of the September 2020 settlement conference, the Parties exchanged
10 detailed settlement conference briefs regarding the merits of the case, including citations to
11 evidence. The Parties also separately made private submissions to Judge Ryu regarding *inter alia*
12 the strengths and weaknesses of the case.

13 127. The Parties and Symantec's insurance carriers held the first settlement conference
14 via videoconference with Judge Ryu on September 14, 2020. That session lasted a full day, but
15 the Parties did not reach an agreement to settle. The Parties continued their discussions for several
16 weeks, under Judge Ryu's supervision, but were unable to reach an agreement to settle at that time.
17 As such, Lead Plaintiff and Lead Counsel continued to litigate for several months, which as
18 detailed above included the completion of extensive fact and expert discovery as well as full
19 briefing on Defendants' motion for summary judgment.

20 128. As discussed with the Court at the April 24, 2021 hearing, the Parties scheduled a
21 second settlement conference, also via videoconference, with Judge Ryu for May 24, 2021. ECF
22 No. 391. In advance of this second settlement conference, the Parties provided Judge Ryu with
23 the summary judgment briefing and also made separate private submissions to Judge Ryu
24 regarding *inter alia* the strengths and weaknesses of the case. The May 24 settlement conference
25 was supervised by Judge Ryu and attended by all Parties as well as Symantec's insurance carriers
26 by videoconference. After a full day of negotiations involving Judge Ryu, the Parties reached an
27 agreement in principle to settle the Action in full for \$70,000,000 in cash, subject to the Court's

1 approval. The Parties then negotiated a term sheet (the “Term Sheet”) to memorialize the proposed
2 Settlement, which they executed on May 26, 2021.

3 129. The Term Sheet sets forth, among other things, the Parties’ agreement to settle and
4 release all claims against Defendants in return for a cash payment, to be paid by or on behalf of
5 Defendants, of \$70,000,000 for the benefit of the Class, subject to certain terms and conditions
6 and the execution of a customary “long form” stipulation and agreement of settlement and related
7 papers.

8 130. The Parties then spent several days negotiating the full Stipulation and Agreement
9 of Settlement, which was finalized and executed on June 8, 2021. ECF No. 394-1. The Parties
10 also negotiated a confidential Supplemental Agreement, which was also executed on June 8, 2021.
11 As ordered by the Court (ECF No. 401), Lead Counsel filed with the Court *in camera* a copy of
12 the confidential Supplement Agreement. ECF No. 403.

13 **IV. THE SIGNIFICANT RISKS INVOLVED IN THIS SECURITIES CLASS** 14 **ACTION**

15 131. As summarized below, Plaintiffs faced significant risks—both general and
16 specific—in prosecuting the Action. Even though the Action had survived Defendants’ motion to
17 dismiss, settlement was by no means inevitable and certainly not at the level ultimately achieved.

18 **A. General Risks Involved In Prosecuting Securities Class Actions**

19 132. In recent years, securities class actions as a group have become riskier than they
20 perhaps were in prior years. For example, data from Cornerstone Research shows that, in each
21 year between 2015 and 2017, a majority of the securities class actions filed were dismissed.⁵ And
22 well-known economic consulting firm NERA found that there was a 26% increase in the number
23
24
25

26 ⁵ See CORNERSTONE RESEARCH, SECURITIES CLASS ACTION FILINGS: 2020 YEAR IN REVIEW, at 18
27 (2021) (attached hereto as Exhibit 11).

1 of non-merger securities class actions that were dismissed in 2020, resulting in a record number
2 of cases being dismissed.⁶

3 133. Indeed, as noted above, the Court initially dismissed this very Action, which
4 crystallized the very real risk of dismissal. This is especially true given that the same issues that
5 initially caused this Court to dismiss Plaintiff's securities law claims in their entirety—*i.e.*,
6 materiality and scienter—continued to hang over the Action throughout the entire litigation, as
7 detailed herein.

8 134. Further, securities class actions are often dismissed at the summary judgment stage.
9 *See, e.g., Murphy v. Precision Cast Parts Corp.*, 2021 WL 2080016 (D. Ore. May 24, 2021);
10 *Fosbre v. Las Vegas Sands Corp.*, 2017 WL 55878 (D. Nev. Jan. 3, 2017), *aff'd Pompano Beach*
11 *Police & Firefighters' Ret. Sys. v. Las Vegas Sands Corp.*, 732 Fed. Appx. 543 (9th. Cir. 2018); *In*
12 *re Omnicom Grp., Inc. Sec. Litig.* 541 F. Supp. 2d 546, 554-55 (S.D.N.Y. 2008), *aff'd* 597 F.3d
13 501 (2d Cir. 2010); *see also In re Xerox Corp. Sec. Litig.*, 935 F. Supp. 2d 448, 496 (D. Conn.
14 2013), *aff'd* 766 F.3d 172 (2d Cir. 2014). And even cases that have survived summary judgment
15 are dismissed prior to trial in connection with *Daubert* motions. For example, in *In re Pfizer Inc.*
16 *Sec. Litig.*, Judge Swain of the Southern District of New York granted the defendants' motion *in*
17 *limine* to exclude the testimony of the plaintiffs' proffered damages expert. Then, Judge Swain
18 granted the defendants' renewed motion for summary judgment based on the plaintiffs' failure to
19 proffer admissible loss causation and damages evidence. *See In re Pfizer Inc. Sec. Litig.*, 2014
20 WL 3291230 (S.D.N.Y. July 8, 2014); *see also Bricklayers and Trowel Trades Int'l Pension Fund*
21 *v. Credit Suisse First Boston*, 853 F. Supp. 2d 181 (D. Mass. 2012), *aff'd* 752 F.3d 82 (1st Cir.
22 2014) (granting summary judgment *sua sponte* in favor of the defendants after finding that the
23 event study offered by plaintiffs' expert was unreliable and that there was accordingly no evidence
24 that the market reacted negatively to disclosures).

25
26 ⁶ *See* JANEEN MCINTOSH AND SVETLANA STARYKH, NERA ECONOMIC CONSULTING, RECENT
27 TRENDS IN SECURITIES CLASS ACTION LITIGATION: 2020 FULL-YEAR REVIEW, at 12 (2021)
(attached hereto as Exhibit 12).

1 135. Even when securities class action plaintiffs are successful in overcoming motions
2 to dismiss, getting a class certified, have prevailed at summary judgment, overcome *Daubert*
3 motions, and have gone to trial, there are still very real risks that there will be no recovery or
4 substantially less recovery for class members. For example, in *In re BankAtlantic Bancorp, Inc.*
5 (S.D. Fla. 2010), a jury rendered a verdict in plaintiffs' favor on liability in 2010. In 2011, the
6 district court granted defendants' motion for judgment as a matter of law and entered judgment in
7 favor of the defendants on all claims. 2011 WL 1585605 (S.D. Fla. Apr. 25, 2011). In 2012, the
8 Eleventh Circuit affirmed the district court's ruling, finding that there was insufficient evidence to
9 support a finding of loss causation. *In re BankAtlantic Bancorp, Inc.*, 688 F.3d 713 (11th Cir.
10 2012).

11 136. In the case of a high-profile securities litigation that was successful at trial,
12 intervening changes in the law have resulted in not a single dollar being recovered in over thirteen
13 years of litigation. In *In re Vivendi Universal, S.A. Securities Litigation* (S.D.N.Y. 2010), a jury
14 found Vivendi liable for violations of the federal securities laws after a trial in the Southern District
15 of New York in 2010. Subsequently, the class was significantly narrowed by the Supreme Court's
16 opinion in *Morrison v. Nat'l Australia Bank Ltd.*, 561 U.S. 247 (2010) (holding that Section 10(b)
17 does not apply extraterritorially), which eviscerated the plaintiffs' damage claims. The parties
18 then argued over the apportionment of damages to various class members. As such, for many
19 years (well over a decade) after the action was initially commenced and years after the jury verdict
20 was delivered, the litigation remained ongoing. Indeed, in 2015, the court granted summary
21 judgment in favor of Vivendi with respect to claims by a large investor group who purchased
22 through a single asset manager, ruling that Vivendi had rebutted the presumption of reliance with
23 respect to the asset manager and rejecting the group's \$57 million damages claim. *See In re*
24 *Vivendi Universal, S.A. Securities Litigation*, 02-cv-05571, 2015 WL 4758869 (S.D.N.Y. Aug. 11,
25 2015).

1 137. Similarly, a district court in Oregon reconsidered its order denying defendants'
2 motion for summary judgment and granted the motion more than a year later based on a new
3 decision by the Ninth Circuit. *See Murphy v. Precision Castparts Corp.*, *supra*, 2021 WL
4 2080016, at *6.

5 138. In sum, Lead Counsel respectfully submit that securities class actions face serious
6 risks of dismissal and non-recovery at all stages of litigation.

7 **B. Specific Risks In Prosecuting This Securities Class Action**

8 139. Although Plaintiffs believe that the securities fraud claims at issue in this Action
9 have merit, Defendants raised several challenges to each element of Lead Plaintiff's claims that
10 posed significant risks that Defendants could prevail at summary judgment or trial—or
11 successfully reduce damages significant or even eliminate them entirely. Given these risks,
12 Plaintiffs strongly believe that the proposed Settlement is in the best interests of the Class.

13 **1. Risks to Proving Falsity**

14 140. The gravamen of this Action concerned Lead Plaintiff's allegations that Defendants
15 manipulated Symantec's reported revenues and non-GAAP financial measures by misclassifying
16 ordinary operating expenses as T&T expenses to hit executive compensation targets. Defendants
17 raised several serious challenges to Plaintiff's allegations that presented significant risk.

18 141. For example, Defendants argued in their summary-judgment motion that no witness
19 testified at deposition that any *specific* T&T expenses were misclassified. Indeed, Defendants
20 argued that the two whistleblowers "lack[ed] personal knowledge" of the allegations and, as such,
21 their accounts were inadmissible and "should be ignored." See, e.g., ECF No. 360 at 15.

22 142. Defendants also claimed in their motion for summary judgment that several former
23 employees in Symantec's technical accounting group testified that they carefully reviewed T&T
24 expense classifications, were not aware of any specific misclassified T&T expenses, and had
25 resisted pressure to misclassify such expenses. For instance, Defendants pointed to testimony from
26 Symantec's former Chief Accounting Officer, who testified that "we never reported amounts

1 incorrectly.” While Plaintiffs believe that they had developed evidence rebutting this testimony,
2 there was a serious risk that the Court or a jury would credit Defendants’ arguments.

3 143. Defendants argued that the unqualified audit opinions offered, and additional
4 reviews conducted by Symantec’s outside auditor, KPMG, further confirmed the accuracy of the
5 Company’s accounting and the lack of any misstatements. Relatedly, Defendants argued that other
6 accounting consultants, like EY, reviewed Symantec’s T&T accounting practices and did not find
7 that they failed to comply with SEC guidance.

8 144. Defendants further argued that Lead Plaintiff’s accounting expert was able to
9 identify and quantify only \$58.3 million of allegedly specific misclassified T&T expenses. To
10 counter that argument, Plaintiffs and Lead Plaintiff’s accounting expert presented a theory of
11 liability that all of Symantec’s reported T&T expenses were misleading because, contrary to
12 Symantec’s claim that these expenses facilitated comparison to its peers, none of Symantec’s peers
13 excluded similar T&T expenses. Defendants’ expert vigorously contested this assertion, arguing
14 that Symantec disclosed that its non-GAAP methods may differ from other companies and, even
15 if misleading, the peer disclosure was removed early in the Class Period. While Plaintiffs believe
16 this theory of Defendants’ liability is sound, it is difficult to predict with any certainty how the
17 Court or a jury would decide this issue, creating significant risk to the Class’s claims.

18 145. There are two additional risks worth mentioning here. First, the SEC has to-date
19 not taken any action against Symantec, even though it has been investigating the misconduct at
20 issue in this case since 2018. Defendants undoubtedly would have tried to get that fact into
21 evidence in some fashion at trial, which might have been persuasive to a jury. Second, Plaintiffs
22 also developed a theory of liability in discovery that Defendants misled investors about Symantec’s
23 growth in deferred revenue, which was based on lengthening contract duration. Defendants,
24 however, insisted that this theory was not pled in the operative complaint and that it was too late
25 to amend to conform the pleadings to the new evidence. Indeed, Defendants vigorously opposed
26 Plaintiffs’ request to do so, which created risk that the Court would deny it.

1 **2. Risks to Proving Materiality**

2 146. ***The \$12 Million Oracle Transaction.*** Defendants argued at summary judgment,
3 and would have argued at trial, that the Oracle transaction, which accounted for \$12 million in
4 revenue booked prematurely, was immaterial because it accounted for less than 1% of FY 4Q18
5 revenues and 0.25% of FY18 revenues. While Lead Plaintiff's accounting expert disagreed with
6 Defendants' accounting expert, there is no telling how the Court or a jury would resolve this battle
7 of the experts.

8 147. ***Specific Misclassified T&T Expenses.*** As noted above, Defendants argued that
9 Plaintiffs and Lead Plaintiff's expert were able to quantify only \$58.3 million in allegedly
10 misstated T&T expenses. Defendants argued that these amounts are immaterial, and the Court, in
11 its order granting Lead Plaintiff leave to amend, was particularly focused on Lead Plaintiff's ability
12 to quantify allegedly misclassified T&T expenses. If the Court or a jury were to reject Plaintiffs'
13 argument that all of Symantec's T&T expenses generally were misleadingly presented under
14 GAAP because they did not facilitate comparison to Symantec's peers, Lead Plaintiff's claims
15 would be significantly undermined.

16 **3. Risks to Proving Scienter**

17 148. Assuming that Lead Plaintiff could successfully establish that Defendants'
18 statements were materially false or misleading, Plaintiffs still faced significant risks in proving that
19 Defendants knowingly or recklessly made misstatements—*i.e.*, the element of scienter, which is
20 notoriously difficult to prove in securities fraud actions.

21 149. For example, Defendants argued at summary judgment and would argue at trial that
22 a myriad of facts negated a finding of scienter, including, for example, Symantec's processes and
23 procedures for reviewing T&T expenses, including Board-level review; former CEO Clark's
24 decision to hire EY review the Company's T&T expenses; and Symantec's decision to voluntarily
25 undertake the Audit Committee investigation. Likewise, Defendants cited the review and analysis
26 of Symantec's accounting practices by multiple accounting firms—including Symantec's outside

auditor, KPMG, and its T&T consultant, EY—as further confirmation of their lack of fraudulent knowledge or intent. According to Defendants, these were all robust and compelling indicia of their good faith efforts to get Symantec’s accounting right—and precluded any conclusion of an intent to defraud investors. While Plaintiffs disagreed, there was significant risk that the Court or a jury could credit Defendants’ version of events.

150. Defendants further argued that scienter could only be proved through Defendant Clark (former CEO) because the other individual defendants were dismissed from the Action. Defendants insisted that proving Defendant Clark’s scienter would be impossible because he did not approve and was not aware of any misclassified T&T expenses, he relied on the Company’s accounting staff to handle such matters and, when issues arose, he promptly tried to address them in good faith, including by hiring outside consultants. Thus, there was a significant risk that the Court or a jury could agree with Defendants. Indeed, the Court initially found Defendants’ innocent version of events compelling enough to dismiss the whole case, holding that the allegations in the initial consolidated complaint “fail[ed] to raise an inference that is as compelling as the opposing inference that Symantec simply announced an investigation into, and then thoroughly investigated, a former employee’s claims of improper accounting practices, later recommending control enhancements to address those concerns.” *SEB Inv. Mgmt. AB v. Symantec Corp.*, 2019 WL 2491935, *10 (N.D. Cal., June 14, 2019).

151. As to the allegation that Defendants misled investors regarding Symantec’s increasing contract duration, Defendants argued at summary judgment that they were investigating the issue during the Class Period—and thus had no obligation to disclose anything while the investigation was ongoing. Defendants further argued that, once they understood what was happening, they promptly and thoroughly disclosed the truth to Class members in January 2018. While Plaintiffs disputed that claim, there again was a significant risk that the Court or a jury could accept Defendants’ arguments.

1 **4. Risks to Proving Loss Causation and Damages**

2 152. Defendants also advanced several loss-causation and damages arguments that, if
3 successful, would have significantly reduced or even eliminated entirely the Class's ability to
4 recover damages.

5 153. Defendants' main argument was that Class-wide compensable damages were *zero*
6 because the alleged corrective disclosures merely discussed the existence of an investigation,
7 without any admission of wrongdoing or correction of any specific alleged misrepresentations.
8 Defendants further argued that the later-disclosed conclusions of the Audit Committee
9 investigation also contained no admission of wrongdoing or correction of misrepresentations.
10 According to Defendants, the extensive Audit Committee investigation revealed no material
11 accounting improprieties, found only that an immaterial \$12 million in revenue had been booked
12 a quarter early and otherwise recommended innocuous control enhancements. If successful—
13 which they were on the initial motion to dismiss—Defendants' arguments would have eliminated
14 damages altogether and Class members would have recovered nothing.

15 154. On the contract duration claims (which Defendants contested as a new claim not
16 properly before the Court), Defendants argued that Symantec disclosed in January 2018 that
17 contract duration was increasing, which precluded any damages for this claim because the truth
18 was already known to the market. Further, throughout the litigation, Defendants repeatedly argued
19 that the August 2018 alleged corrective disclosure could not give rise to any damages because it
20 revealed no "new" information about the fraud.

21 155. As noted, Defendants' main argument was that damages were zero and, as such,
22 they did not offer an affirmative damages figure that they believed was appropriate. That said,
23 however, Defendants' expert did calculate damages (while disputing that they were appropriate)
24 based on the assumption that Lead Plaintiff could establish liability for securities fraud, but
25 Defendants would nevertheless prevail on certain disputed arguments regarding loss causation,
26 including elimination of the August 2018 corrective disclosure, as well as certain offsets, including

removal of the contract duration claim. According to Defendants and their expert, if they had prevailed on only those arguments, they would reduce aggregate damages to as low as approximately \$126 million (based on Lead Plaintiff's expert's calculations using Defendants' expert's figures and conclusions), including netting of gains on sales of Symantec stock purchased before the Class Period. *See, e.g.*, ECF No. 292-1 at 374-78.

156. In sum, while Plaintiffs dispute all of Defendants' arguments on liability, loss causation, and damages, there was a significant risk that the Court or a jury could decide for Defendants on some or all of them. If so, damages would have been significantly reduced or even eliminated altogether. Given these risks and the liability risks discussed above, the Settlement is in the best interests of the Class by providing them with a guaranteed, prompt, and significant financial recovery.

C. The Percentage Recovery of the Settlement Represents an Excellent Result for the Class Given the Risks of Continued Litigation

157. A comparison of the \$70 million recovery to the potential damages that might be recovered for the Class at trial further supports the reasonableness of the Settlement.

158. Based on a full damages study, Lead Plaintiff's damages expert estimated that the maximum possible damages here, assuming complete success in proving liability and 100% valid claims from the Class post-trial, would be approximately \$1.0096 billion in total Class-wide damages for Plaintiff's claims under Sections 10(b) and/or 20(a) of the Exchange Act.⁷ But, if Class Members' gains on shares owned prior to the Class Period but sold for a profit during the Class Period were deducted, then the maximum possible damages would be reduced to \$679.6 million—still assuming complete success in proving liability at trial. Thus, the \$70 million Settlement represents approximately 6.9% to 10.2% of the absolute maximum damages

⁷ The insider trading claims under Section 20A of the Exchange Act had damages that ranged, depending on methodology, from \$772,000 (based on inflation, which would overlap with 10(b) damages) to \$6 million (based on sale prices assuming a cost of zero). To err on the side of caution, the percentage recovery figures herein use the maximum \$6 million to calculate the totals.

(depending on whether gains on pre-Class Period holdings are netted) that could be recovered for the Class if Lead Plaintiff prevailed at trial on *all* issues of falsity, materiality, scienter, and loss causation. As set forth above, such success was far from certain given Defendants' substantial arguments regarding all elements of liability, loss causation, and damages that, if accepted, would have substantially lowered the maximum damages or *eliminated them entirely*.

159. Alternatively, if Defendants' damages calculations were used, the percentage of recovery increases considerably. For example, as explained above, Defendants claimed that damages were zero. But, their expert did calculate damages based on the assumption that Lead Plaintiff could establish liability for securities fraud, but Defendants would nevertheless prevail on certain disputed arguments regarding loss causation, including elimination of the August 2018 corrective disclosure, as well as certain offsets, including removal of the contract duration claim. Based on these assumptions, Defendants' experts' calculations pegged aggregate maximum damages as low as approximately \$126 million (based on Lead Plaintiff's expert's calculations using Defendants' expert's figures and conclusions), including netting of gains on sales of Symantec stock purchased before the Class Period. *See, e.g.*, ECF No. 292-1 at 374-78. In this scenario, the proposed Settlement of \$70 million represents a recovery of over 55.6% of Defendants' calculation of maximum damages.

V. LEAD PLAINTIFF'S COMPLIANCE WITH THE COURT'S NOTICE ORDER

160. The Court's September 16, 2021 Preliminary Approval Order directed that the Notice of (I) Proposed Settlement and Plan of Allocation; (II) Settlement Fairness Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses (the "Settlement Notice") and Proof of Claim and Release Form ("Claim Form") be disseminated to the Class. The Preliminary Approval Order also set a January 13, 2022 deadline for Class Members to submit objections to the Settlement, the Plan of Allocation and/or the Fee and Expense Application or to request exclusion from the Class, and set a final approval hearing date of February 10, 2022.

1 161. Pursuant to the Preliminary Approval Order, Lead Counsel instructed A.B. Data,
2 Ltd. (“A.B. Data”), the Court-approved Claims Administrator, which had previously conducted
3 the mailing of the Class Notice and Supplemental Class Notice, to begin disseminating copies of
4 the Court-approved Settlement Notice and the Claim Form by mail and to publish the Summary
5 Settlement Notice. The Settlement Notice contains, among other things, a description of the
6 Action, the Settlement, the proposed Plan of Allocation and Class Members’ rights to participate
7 in the Settlement, object to the Settlement, the Plan of Allocation and/or the Fee and Expense
8 Application, or exclude themselves from the Class. The Settlement Notice also informs Class
9 Members of Lead Counsel’s intent to apply for an award of attorneys’ fees in an amount not to
10 exceed 19% of the Settlement Fund, and for payment of Litigation Expenses in an amount not to
11 exceed \$2.5 million. A.B. Data disseminated the Settlement Notice and Claim Form (together, the
12 “Settlement Notice Packet”) to all potential Class Members who had previously been identified in
13 the prior mailings of the Class Notice and Supplemental Class Notice, as well as to any additional
14 potential Class Members who were identified in response to dissemination of the Settlement Notice
15 Packet. *See* Declaration of Eric J. Miller Regarding: (A) Mailing of the Settlement Notice and
16 Claim Form; (B) Publication of the Summary Settlement Notice; and (C) Report on Requests for
17 Exclusion Received to Date (“Miller Decl.”), attached hereto as Exhibit 2, at ¶¶ 4-5.

18 162. On September 24, 2021, A.B. Data disseminated 162,865 copies of the Settlement
19 Notice Packet to potential Class Members and nominees by first-class mail. *See* Miller Decl. ¶¶ 4-
20 5. As of December 29, 2021, A.B. Data had disseminated a total of 169,578 Settlement Notice
21 Packets. *Id.* ¶ 5.

22 163. In accordance with the Preliminary Approval Order, A.B. Data caused the
23 Summary Settlement Notice to be published in the *Financial Times* on October 5, 2021 and to be
24 published in *The Wall Street Journal* and to be transmitted over the *PR Newswire* on October 8,
25 2021. *Id.* ¶ 6.

164. A.B. Data made also copies of the Settlement Notice and Claim Form available on the case website, www.SymantecSecuritiesLitigation.com. At the direction of Lead Counsel, A.B. Data also added information concerning the Settlement to that website and provided access to other documents and Court orders concerning the Settlement, including the Stipulation and Preliminary Approval Order. *Id.* ¶ 7. Copies of the Settlement Notice and Claim Form were also made available on Lead Counsel's website, www.blbglaw.com.

165. As set forth above, the deadline for Class Members to file objections to the Settlement, the Plan of Allocation and/or the Fee and Expense Allocation or to request exclusion from the Class (if they had not previously done so) is January 13, 2022. To date, no objections to the Settlement, the Plan of Allocation or Lead Counsel's Fee and Expense Application have been received. In addition, eight additional exclusions from the Class have been received. *See* Miller Decl. ¶ 9. Plaintiffs will address all requests for exclusion and any objections that may be received in their reply papers, which will be filed on February 3, 2022, after the deadline for objecting or requesting exclusion has passed.

VI. ALLOCATION OF THE PROCEEDS OF THE SETTLEMENT

166. Pursuant to the Preliminary Approval Order, and as set forth in the Settlement Notice, all Class Members who want to participate in the distribution of the Net Settlement Fund (*i.e.*, the Settlement Fund less (a) any taxes, (b) any Notice and Administration Costs, (c) any Litigation Expenses awarded by the Court, and (d) any attorneys' fees awarded by the Court) must submit a valid Claim Form with all required information postmarked (if mailed), or submitted online, no later than 28 days after the final approval of the Settlement of the Court. Class Members were informed that the claim deadline might be as early as March 10, 2022, and that they did not need to wait until Court approval but could submit their claims before that date.

167. The plan of allocation proposed by Plaintiff (the "Plan of Allocation") is set forth at pages 11 to 15 of the Settlement Notice. If approved, the Plan of Allocation will govern how the Net Settlement Fund will be distributed among Authorized Claimants. The proposed Plan of

1 Allocation is designed to achieve an equitable and rational distribution of the Net Settlement Fund.
2 However, the Plan of Allocation is not a formal damage analysis and the calculations made
3 pursuant to the Plan of Allocation are not intended to be estimates of, nor indicative of, the amounts
4 that Class Members might have been able to recover after a trial.

5 168. Lead Counsel developed the Plan of Allocation in consultation with Lead Plaintiff's
6 damages expert. In developing the Plan of Allocation, Lead Plaintiff's damages expert calculated
7 the estimated amount of alleged artificial inflation in the per-share prices of Symantec common
8 stock that was alleged to have been proximately caused by Defendants' alleged misstatements and
9 omissions. *See* Settlement Notice ¶ 54. In calculating the estimated artificial inflation, the expert
10 considered price changes in Symantec common stock in reaction to the disclosures that allegedly
11 corrected the alleged misrepresentations and adjusted for market and industry factors. *Id.*

12 169. Under the Plan of Allocation, a "Recognized Loss Amount" will be calculated for
13 each purchase of Symantec common stock during the Class Period (*i.e.*, from May 11, 2017 to
14 August 2, 2018, inclusive) that is listed in the Claim Form and for which adequate documentation
15 is provided. *See* Settlement Notice ¶ 58. The calculation of Recognized Loss Amounts will depend
16 upon when the Symantec common stock was purchased and sold. In general, the Recognized Loss
17 Amount calculated will be the difference between the estimated artificial inflation on date of
18 purchase and the estimated artificial inflation on date of sale, or the difference between the actual
19 purchase price and sales price of the stock, whichever is less. *Id.* ¶¶ 57, 61. For shares sold during
20 or after the 90-day period following the end of the Class Period, the Plan also limits Recognized
21 Loss Amounts based on the average price of the stock during that 90-day period, consistent with
22 the PSLRA. *Id.* ¶¶ 61(c)(iii), 61(d)(ii).

23 170. Claimants who did not hold their Symantec shares over one of the alleged corrective
24 disclosure dates in the Plan of Allocation (May 11, 2018 and August 2, 2018)—that is, those who
25 sold their shares before the first disclosure date or who purchased and then sold all their shares
26 between the two alleged disclosure dates—will have no Recognized Loss Amount as to those

1 transactions under the Plan of Allocation. *Id.* ¶ 60. This outcome is fair and reasonable because
2 any market loss that Claimants may have suffered on those transactions would not have been
3 caused by revelation of the alleged fraud.

4 171. Claimants who purchased their shares “contemporaneously” with sales of
5 Symantec common stock by Defendant Clark during the Class Period (defined as within nine
6 trading days after Defendant Clark’s sales) will be entitled to an increase in their Recognized Loss
7 Amount on those purchases to reflect that they had claims against Defendant Clark under Section
8 20A of the Exchange Act that were not possessed by all other members of the Class. *See*
9 Settlement Notice ¶ 62. Specifically, all Claimants who purchased shares of Symantec common
10 stock from August 28, 2017 through September 14, 2017 (the “20A Period”) will be entitled to an
11 additional 2% enhancement of their Recognized Loss Amount. *Id.* The 2% enhancement was
12 determined by considering (a) the amount of additional incremental (non-overlapping) damages
13 that might have been recovered from Defendant Clark under the Section 20A claims at trial; (b)
14 the estimated litigation risks of succeeding on those claims; and (c) the percentage of eligible Class
15 purchases estimated to have occurred during the 20A Period.

16 172. The sum of the Recognized Loss Amounts for all of a Claimant’s purchases of
17 Symantec common stock during the Class Period is the claimant’s “Recognized Claim” and the
18 Net Settlement Fund will be allocated to Authorized Claimants on a *pro rata* basis based on the
19 relative size of their Recognized Claims. *See* Settlement Notice ¶¶ 64, 71.

20 173. The Plan of Allocation provides that one hundred percent of the Net Settlement
21 Fund will be distributed to Authorized Claimants. If any funds remain after an initial distribution
22 to Authorized Claimants, as a result of uncashed or returned checks or other reasons, subsequent
23 distributions will be conducted as long as they are cost effective. *See* Settlement Notice ¶ 73. If
24 further distributions of the Net Settlement Fund to Authorized Claimants are no longer cost-
25 effective, the Plan provides that the residual funds (if any), will be distributed to the Investor
26 Protection Trust, a 501(c)(3) nonprofit organization devoted to investor education. The Investor

Protection Trust is an appropriate *cy pres* recipient because it corresponds to the nature of the securities fraud claims at issue and courts in this District have approved it as a *cy pres* recipient in other similar actions. *See In re RH, Inc. Securities Litigation*, Case No. 4:17-00554-YGR (N.D. Cal.); *Hefler v. Wells Fargo & Company*, Case No. 3:16-cv-05479-JST (N.D. Cal.); and *In re HP Securities Litigation*, Case No. 3:12-CV-05980-CRB (N.D. Cal.).⁸ As noted above, payment will only be made to this charity when the residual amount left for re-distribution to Class Members is so small that a further re-distribution would not be cost effective (for example, where the costs to conduct the distribution would largely exhaust the funds available to distribute).

174. In sum, the Plan of Allocation was designed to fairly and rationally allocate the proceeds of the Net Settlement Fund among Class Members based on the losses they suffered on transactions in Symantec common stock that were attributable to the conduct alleged in the Complaint and on the relative strengths of their claims. Accordingly, Lead Counsel respectfully submits that the Plan of Allocation is fair and reasonable and should be approved by the Court.

175. As noted above, as of December 29, 2021, more than 169,000 copies of the Settlement Notice, which contains the Plan of Allocation, and advises Class Members of their right to object to the proposed Plan of Allocation, have been sent to potential Class Members and nominees. *See Miller Decl.* ¶ 5. To date, no objections to the proposed Plan of Allocation have been received.

VII. THE FEE AND LITIGATION EXPENSE APPLICATION

176. In addition to seeking final approval of the Settlement and Plan of Allocation, Lead Counsel is applying to the Court for an award of attorneys' fees and payment of litigation expenses.

177. Specifically, for Lead Counsel's dedicated and extensive efforts on behalf of the Class resulting in the proposed \$70 million cash Settlement, Lead Counsel is applying for a fee award of 19% of the Settlement Fund, or \$13,300,000, plus interest earned at the same rate as earned by the Settlement Fund (the "Fee Application"). Lead Counsel also respectfully requests

⁸ BLB&G has no relationship with the Investor Protection Trust other having selected it as a *cy pres* recipient in several other securities class actions.

1 payment for litigation expenses that it incurred in connection with the prosecution of the Action
2 from the Settlement Fund in the amount of \$2,000,208.69 (the “Expense Application”).

3 178. Based on the factors discussed below, and on the legal authorities set forth in the
4 accompanying Memorandum of Law in Support of Lead Counsel’s Motion for Attorneys’ Fees
5 and Litigation Expenses (the “Fee Memorandum”) being filed contemporaneously herewith, I
6 respectfully submit that Lead Counsel’s motion for fees and expenses should be granted.

7 **A. The Fee Application**

8 179. For its efforts on behalf of the Class, Lead Counsel is applying for a fee award to
9 be paid from the Settlement Fund on a percentage basis. The percentage method is the standard
10 and appropriate method of fee recovery because it aligns the lawyers’ interest in being paid a fair
11 fee with the interests of Lead Plaintiff and the Class in achieving the maximum recovery in the
12 shortest amount of time required under the circumstances. Use of the percentage method has been
13 recognized as appropriate by the Supreme Court and Ninth Circuit for cases of this nature where
14 an all-cash common fund has been recovered for the Class.

15 180. Based on the quality of the result achieved, the extent and quality of the work
16 performed, the significant risks of the litigation, and the fully contingent nature of the
17 representation, Lead Counsel respectfully submits that a fee of 19% of the Settlement Fund is
18 reasonable and should be approved. As discussed in the Fee Memorandum, a 19% fee award is
19 substantially below the 25% benchmark for percentage fee awards in the Ninth Circuit, is below
20 the range of percentage fees typically awarded in securities class actions in this Circuit, and is fair
21 and reasonable in light of all the circumstances in this case. Further, the 19% fee requested will
22 constitute a negative multiplier—or a significant discount—on Lead Counsel’s total lodestar
23 devoted to the prosecution of the Action.

24 181. Further, consistent with the Court’s practices, Lead Counsel requests that the 50%
25 of the attorneys’ fees be paid upon award, and 50% of the fee be paid when the distribution of the
26 Net Settlement Fund to eligible Class Members has occurred.

1 **1. The Time and Labor Required to Achieve the Settlement**

2 182. The time and labor expended by Lead Counsel is pursuing this Action and
3 achieving the Settlement strongly demonstrate the reasonableness of the requested fee. Lead
4 Counsel devoted substantial time to the prosecution of the Action. As described in detail above,
5 the work that Lead Counsel performed in this Action included, among other things: (i) conducting
6 an extensive investigation of the claims at issue, including interviews with 155 former Symantec
7 employees and the filing of two detailed amended complaints; (ii) litigating Defendants' motion
8 to dismiss and a vigorously contested motion for leave to amend, which resurrected certain of the
9 securities fraud claims at issue after they had been initially dismissed; (iii) successfully litigating
10 a contested class certification motion; (iv) completing extensive fact and expert discovery, which
11 included reviewing more than 2.1 million pages of documents from Defendants and multiple third
12 parties, a contested discovery motion, the submission of nine expert reports from a total of six
13 experts, and taking or defending a total of 29 class-certification, fact, and expert depositions;
14 (v) fully briefing Defendants' motion for summary judgment; and (vi) engaging in substantial
15 arm's length settlement negotiations, including two settlement conferences held months apart,
16 which all was closely supervised by Judge Ryu.

17 183. As detailed above, throughout this case, Lead Counsel devoted substantial time to
18 the prosecution of this Action. While I personally devoted substantial time to this case, other
19 highly experienced and knowledgeable attorneys at BLB&G assisted in aspects of the case as
20 needed. More junior attorneys and paralegals also assisted in working on matters appropriate to
21 their skill and experience levels.

22 184. Attached hereto as Exhibit 3 is a schedule summarizing the amount of time spent
23 by the attorneys and professional support staff employees of Lead Counsel on the Action from its
24 inception through June 8, 2021, and a lodestar calculation for those individuals. As set forth in
25 Exhibit 3, the number of hours expended by BLB&G on the Action from its inception through
26 June 8, 2021 is 43,240, for a lodestar of \$20,028,151.25. As noted, the requested fee of 19% of

1 the Settlement Fund (or \$13,300,000, plus interest) therefore represents a fractional amount
2 (referred to as a “negative” multiplier) of approximately 0.66 of Lead Counsel’s lodestar. Such a
3 request is below the positive fee multipliers typically awarded in comparable securities class
4 actions and in other class actions involving contingency fee risk. As it constitutes a “negative”
5 multiplier, the requested fee represents a substantial discount on the total lodestar that Lead
6 Counsel devoted to the prosecution of this Action.

7 185. The information in this declaration and its exhibits regarding the time spent on the
8 Action by Lead Counsel’s attorneys and other professional staff is based on contemporaneous time
9 records regularly prepared and maintained by BLB&G. I am one of the partners who oversaw and
10 conducted the day-to-day activities in the litigation, and I and a team working under my
11 supervision reviewed these time records in connection with preparing this Declaration. The
12 purpose of this review was to confirm both the accuracy of the time entries and the necessity for,
13 and reasonableness of, the time committed to the litigation. To the extent that any specific time
14 entries were unclear as to the specific projects to which they related or appeared to cover multiple
15 projects, my team and I allocated the time entries between specific projects based on our detailed
16 knowledge of and direct involvement in the litigation, review of surrounding time entries, review
17 of the record in this case and/or through discussions with the relevant timekeeper to the extent
18 necessary. When my team or I found errors or erroneous time entries, we clarified or corrected
19 them also based on our detailed knowledge of and direct involvement in the litigation, review of
20 surrounding time entries, review of the record in this case and/or through discussions with the
21 relevant timekeeper to the extent necessary.

22 186. To the best of my knowledge, and based on my and my team’s substantial efforts,
23 the following categories of time expended by Lead Counsel have been excluded from, and are not
24 included in, this application for fees and expenses:
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- a) all of the substantial time expended by Lead Counsel in addressing the alleged conflict issue raised by Robbins Geller, including all related discovery, submissions and filings and preparation for and argument at Court hearings;
- b) all time expended in preparing this application for fees and expenses;
- c) all time related to exclusively travel, when substantive work was not being performed;
- d) all of the time expended by BLB&G in seeking to be appointed as Lead Counsel, or assisting Lead Plaintiff in selecting proposed Lead Counsel; and
- e) all time dedicated to the Action by attorneys or other timekeepers with fewer than 25 hours dedicated to the Action (after all previous reductions have been accounted for).

187. My team and I also excluded all time spent on this litigation after June 8, 2021, which was the date the Stipulation and Agreement of Settlement was executed. Since that date, Lead Counsel has expended considerable additional time (a) preparing and filing a motion for preliminary approval and presenting at the preliminary approval hearing; (b) overseeing the distribution of the Settlement Notice Packet to class members; and (c) preparing and filing papers in support of final approval. If the Settlement is approved, Lead Counsel will continue to expend additional time for many months monitoring and overseeing the administration of the Settlement and distribution of payment to Class Members. But Lead Counsel is not seeking reimbursement for this time and effort.

188. Further, my team and I have carefully reviewed our time records and made other reductions in the interests of billing judgment to ensure that the hours presented to the Court reflect meaningful and necessary work that contributed to the resolution of this litigation. Attached here to as Exhibit 4 is a chart that lists the total amount of time for each timekeeper through June 8, 2021 that has been *removed* from the lodestar for any of the above-listed reasons.

189. In addition, although BLB&G senior partner Max Berger was actively involved in the settlement conferences, negotiations, discussions, and strategy sessions, he did not keep contemporaneous records of the time that he spent on those specific projects. As such, while Mr.

1 Berger's time spent on these matters was significant, Lead Counsel did not attempt to estimate it
2 or include it in the lodestar calculation. By contrast, all of Mr. Berger's time that is included in
3 Lead Counsel's lodestar is based on his contemporaneous records.

4 190. The hourly rates for the attorneys and professional support staff in my firm included
5 in Exhibit 3 and the other exhibits to this declaration are the usual and customary rates set by the
6 BLB&G for each individual. These hourly rates are the same as, or comparable to, the rates
7 accepted by courts, including courts in this Circuit, in other contingent-fee securities-class-action
8 litigation or shareholder litigation. *See, e.g., In re Cognizant Tech. Solutions Corp. Sec. Litig.*, No.
9 2:16-cv-06509 (ES) (CLW) (D.N.J. 2021) (awarding fee based on lodestar analysis using BLB&G
10 2021 rates); *In re Baxter Int'l, Inc. Sec. Litig.*, No. 1:19-cv-07786 (N.D. Ill. 2021) (same); *In re*
11 *CenturyLink Sales Practices & Sec. Litig.*, No. 18-296 (D. Minn. 2021) (same); *In re Willis Towers*
12 *Watson plc Proxy Litig.*, No. 1:17-cv-1338-AJT-JFA (E.D. Va. 2021) (same); *In re Volkswagen*
13 *"Clean Diesel" Marketing, Sales Prac., & Prods. Liab. Litig.*, MDL No. 2672 CRB (JSC) (N.D.
14 Cal. 2019) (2019 rates).

15 191. The firm's rates are set based on our annual analysis of rates that are charged by
16 firms performing comparable work and that have been approved by courts and by a selection of
17 defense firms that we frequently litigate against. Lead Counsel believe, based on this analysis and
18 review of other public data, that their hourly rates are comparable to other firms engaged in
19 comparable securities class action work in California and New York and are comparable to or less
20 than rates for comparably experienced attorneys at the large defense firms BLB&G typically
21 litigates against. Different timekeepers within the same employment category (*e.g.*, partners,
22 associates, paralegals, etc.) may have different rates based on a variety of factors, including years
23 of practice, years at the firm, year in the current position (*e.g.*, years as a partner), relevant
24 experience, relative expertise, and the rates of similarly experienced peers at our firm or other
25 firms. For personnel who are no longer employed by my firm, the hourly rate used for the lodestar
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1 calculation is based upon the rate for that person in his or her final year of employment with the
2 Firm.

3 192. Throughout the litigation, Lead Counsel maintained an appropriate level of staffing
4 that ensured the efficient and effective prosecution of this litigation. To that end, in addition to
5 partners, senior counsel, and associates, Lead Counsel also relied upon senior staff attorneys and
6 staff attorneys in prosecuting this Action, whose work included (among other things) a review and
7 analysis of the 2.1 million pages of documents produced by Defendants and non-parties,
8 preparation of substantive memoranda on issues in the case, actively assisting in preparation for
9 depositions, and assisting at certain depositions. The work these attorneys conducted was
10 substantive and crucial to Plaintiffs' successful prosecution of the case. The attorneys who
11 participated in discovery in this Action had significant qualifications, which are summarized,
12 together with the qualifications all attorneys and other professional staff members included in the
13 fee application, in Exhibit 5. The senior staff attorneys and staff attorneys were each full-time
14 W-2 employees of the firm, not independent contractors or employees of a staffing firm; they were
15 each supervised by the Firm's partners and senior counsel and had access to secretarial and
16 paralegal support; and had Firm email addresses, access to the firm's 401(k) program, and
17 eligibility to receive year-end bonuses.

18 193. As noted above, Exhibit 5 hereto provides a summary of the qualifications of each
19 attorney and other professional staff member included in the fee application, as well as a discussion
20 of the role each attorney or staff member played in this litigation. BLB&G's Firm Resume,
21 discussing the qualifications and experiences of the firm as a whole, is attached hereto as Exhibit
22 6.

23 **2. The Litigation Projects Conducted by Lead Counsel**

24 194. In order to provide the Court with further detail about the work performed by Lead
25 Counsel in this Action, Lead Counsel has prepared an analysis, attached here as Exhibit 7, which
26 provides a breakdown of all of Lead Counsel's time dedicated to the Action into 72 distinct
27

1 projects, and provides the supporting time entries for each of those projects. This declaration and
2 Exhibits 3 and 7 were created based on contemporaneous time records maintained by BLB&G, as
3 discussed above. The hours and lodestar provided in Exhibit 7 are net of the reductions for billing
4 judgment, which are also discussed above.

5 **a. Investigation and Pleading Stage**

6 **195. Project #1: Initial Investigation.** Lead Counsel, including both its attorneys and
7 in-house investigators conducted an extensive investigation into the factual and legal underpinning
8 of the potential claims in the Action. The work, the details of which are broken down
9 chronologically in Exhibit 7, included legal research and analysis of possible claims, an extensive
10 review of publicly available documents such as analyst reports, SEC filings, new articles, and
11 publicly available Symantec documents, and extensive efforts to identify, locate, contact, and
12 interview potential witnesses, including interviews with numerous former employees of Symantec.
13 The investigation also included analysis of Class-wide damages. In total, Lead Counsel's attorneys
14 and professional staff spent a total of 583.25 hours, with a collective lodestar of \$259,990.00, on
15 its efforts in investigating the claims from the outset, through the date the Consolidated Complaint
16 was filed.

17 **196. Project #2: Freedom of Information Act Request to the SEC.** In conjunction
18 with the investigation, Lead Counsel filed a Freedom of Information Act ("FOIA") request with
19 the SEC to obtain certain materials related to its investigation of Symantec. Lead Counsel devoted
20 30.50 hours with a lodestar of \$16,242.50 to this project. The work, the details of which are broken
21 down chronologically in Exhibit 7, included preparing the FOIA requests to the SEC, following
22 up with the SEC regarding their response, and preparing an appeal from the SEC's denial of the
23 request.

24 **197. Project #3: Consolidated Complaint.** Lead Counsel spent a total of 890.25 hours,
25 with a total lodestar of \$622,882.50 in preparing for and drafting the Consolidated Complaint and
26 conducting related legal and factual research. The work, the details of which are broken down
27

1 chronologically in Exhibit 7, included factual legal research and analysis of the claims asserted,
2 including securities fraud claims and insider trading claims, drafting, revising and filing the
3 Complaint, and service of the Complaint on Defendants.

4 **198. Project #4: Opposition to Defendants' Motions to Dismiss.** Lead Counsel
5 prepared for and drafted an opposition to Defendants' motions to dismiss the Complaint. Lead
6 Counsel spent a total of 402.5 hours on this project with a lodestar of \$259,910.00. The work, the
7 details of which are broken down chronologically in Exhibit 7, included reviewing Defendants'
8 motions to dismiss, strategizing on the legal issues identified by Defendants, preparing an
9 administrative motion for leave to file an omnibus opposition motion, opposing Defendants'
10 related request for judicial notice, performing extensive legal research on related issues, and
11 drafting and filing the opposition brief on January 9, 2019.

12 **199. Project #5: Oral Argument on Defendants' Motions to Dismiss.** In addition,
13 Lead Counsel spent a total of 127.5 hours, with a lodestar of \$95,372.50, in preparing for the
14 Court's hearing on the motion to dismiss, which was held on January 31, 2019. The work, the
15 details of which are broken down chronologically in Exhibit 7, included reviewing the briefing
16 submitted by the Parties, including Defendants' reply papers, analyzing case law and preparing for
17 oral argument, participating in oral argument, and communicating with SEB regarding these
18 matters.

19 **200. Project #6: Amended Complaint.** While the Court's opinion on the motions to
20 dismiss was pending and after dismissal was granted, Lead Counsel continued its investigation
21 into Symantec and drafted the Amended Complaint. Lead Counsel spent a total of 1,127.50 hours,
22 with a lodestar of \$673,937.50 on this project. The work, the details of which are broken down
23 chronologically in Exhibit 7, included extensive further investigative efforts, including identifying,
24 locating, and interviewing numerous additional former Symantec employees; preparing
25 memoranda of the witness interviews; reviewing numerous Symantec filings, analyst reports,
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media publications, and industry reports; filing a motion to unseal a related derivative action; researching the law; and drafting and filing the Amended Complaint.

201. **Project #7: Motion to Partially Lift Discovery Stay.** On June 28, 2019, Lead Plaintiff filed a motion for *inter alia* a partial modification of the PSLRA discovery stay that would allow Lead Plaintiff access to documents quoted in the shareholder derivative complaint filed in the Derivative Action (*i.e.*, *Lee v. Clark, et al.*, No. 3:19-cv-02522-WHA (N.D. Cal.)). Lead Counsel spent a total of 66.5 hours with a lodestar of \$31,212.50 on this project. The work, the details of which are broken down chronologically in Exhibit 7, included research, drafting, and filing the motion and preparing an accompanying declaration, reviewing Defendants' opposition, and preparing a withdrawal of the motion when it became moot.

202. **Project #8: Motion for Leave to Amend.** Lead Counsel prepared for and drafted a motion for leave to amend the complaint in this Action; an amended motion for leave to amend; and a reply in response to Defendants' oppositions. Lead Counsel spent a total of 633.5 hours preparing for and drafting the motion, with a lodestar of \$437,106.25. The work, the details of which are broken down chronologically in Exhibit 7, included work reviewing the Court's order dismissing the Complaint, researching relevant Ninth Circuit law, strategizing on the legal issues implicated by the Court's motion to dismiss order, drafting and filing the Motion for Leave to Amend on July 11, 2019 and an amended version of the motion on July 23, 2019, preparing and filing related administrative motions to file certain portions of the motion under seal, reviewing Defendants' oppositions, researching and preparing a reply brief filed on August 22, 2019, researching and responding to related motions to strike and for judicial notice filed by Defendants, and preparing for and conducting oral argument on the motion.

b. Document And Written Discovery & Discovery Planning

203. **Project #9: Preparing Joint Case Management Statements and Case Management Conference.** After the Amended Complaint was sustained, Lead Counsel negotiated and preparing two Joint Case Management Statements, including a litigation schedule,

1 and participated in the Initial Case Management Conference on February 13, 2020. Lead Counsel
2 spent a total of 63 hours with a lodestar of \$50,825.00 related to this project. The work, the details
3 of which are broken down chronologically in Exhibit 7, included conferring with Defendants,
4 negotiating and preparing an initial Joint Case Management Statement pursuant to Rule 26(f) filed
5 with the Court on November 29, 2019, negotiating and preparing a subsequent Joint Case
6 Management Statement filed with the Court on February 6, 2020, and preparing for and
7 participating in the Initial Case Management Conference on February 13, 2020.

8 204. **Project #10: Initial Disclosures.** As set forth in Exhibit 7, Lead Counsel spent a
9 total of 19 hours with a lodestar of \$9,893.75 preparing and finalizing Lead Plaintiff's initial
10 disclosures and serving them on Defendants, as well as preparing an amended version of the initial
11 disclosures.

12 205. **Project #11: Lead Plaintiff's Requests for Production of Documents (directed**
13 **to Defendants).** As set forth in Exhibit 7, Lead Counsel spent a total of 55.5 hours with a lodestar
14 of \$33,231.25 drafting Lead Plaintiff's requests for production of documents and serving them on
15 Defendants.

16 206. **Project #12: Review and Analysis of Defendants' Document Production.**
17 Defendants produced a total of 1.8 million pages of documents in response to Lead Plaintiff's
18 document requests. Lead Counsel spent a total of 17,867.25 hours with a lodestar of \$7,220,562.50
19 in reviewing, coding, and analyzing the documents received. The work, the details of which are
20 broken down chronologically in Exhibit 7, included reviewing the documents received for
21 relevance and importance, identifying "hot documents," and participating in regular meetings to
22 review and discuss hot documents and other issues related to the document production. This
23 project also includes many targeted reviews of the document production with respect to certain
24 subject matters and categories of documents, and drafting of memos summarizing and
25 memorializing information found in the documents but does not include targeted reviews of the
26

documents conducted in connection with preparation for depositions or in connection with the opposition to the motion for summary judgment.

207. **Project #13: Interrogatories (directed to Defendants).** As set forth in Exhibit 7, Lead Counsel spent a total of 12.75 hours with a lodestar of \$9,187.50 in preparing Lead Plaintiff's two sets of interrogatories on Defendants, including related discussions and strategy and reviewing Defendants' objections and responses to the interrogatories.

208. **Project #14: Responding to Defendants' Requests for Production of Documents (directed to Lead Plaintiff).** As set forth in Exhibit 7, Lead Counsel spent a total of 60.75 hours with a lodestar of \$35,750.00 preparing objections and responses to Defendants' document requests on Lead Plaintiff and assisting Lead Plaintiff in the production of responsive documents.

209. **Project #15: Lead Plaintiff's Response to Defendants' Requests for Admission.** As set forth in Exhibit 7, Lead Counsel spent a total of 16.25 hours with a lodestar of \$7,750.00 in preparing responses and objections to the Requests for Admission served on Lead Plaintiff by Defendants, including related discussions and strategy.

210. **Project #16: Lead Plaintiff's Response to Defendants' Interrogatories.** As set forth in Exhibit 7, Lead Counsel spent a total of 276 hours with a lodestar of \$119,656.25 in preparing responses and objections to the contention Interrogatories served on Lead Plaintiff by Defendants, which including searching for and identifying documents for inclusion in Lead Plaintiff's detailed responses to Defendants' detailed contention interrogatories.

211. **Project #17: Written Discovery Directed at Third Parties.** Lead Plaintiff served subpoenas on twelve (12) non-parties, including Symantec's outside auditor (KPMG), its accounting consultant (E&Y), and two whistleblowers (referred to herein as Former Employee 1 ("FE1") and Former Employee 2 ("FE2")).⁹ Lead Counsel spent a total of 371 hours with a lodestar of \$167,187.50 on written discovery efforts directed at these third parties. The work, the details

⁹ See ECF No. 400 (order allowing the two former employees to proceed pseudonymously).

of which are broken down chronologically in Exhibit 7, included identifying third parties with potentially relevant information, preparing and serving subpoenas for production of documents on these third parties, meeting and conferring and generally communicating concerning third parties' responses and productions, including by email and/or letter, and reviewing and analyzing the documents obtained from the third parties. This project does not include Lead Counsel's efforts in preparing for and taking the depositions of certain of the third parties, which have their own projects.

212. **Project #18: Meet & Confers with Defendants Concerning Discovery.** As set forth in Exhibit 7, Lead Counsel spent a total of 90.75 hours with a lodestar of \$63,500.00 engaged in formal and informal Meet and Confers and other discussions with Defendants concerning a wide range of discovery issues, such as the scope of Defendants' production in response to Lead Plaintiff's document requests as well as limits on fact depositions.

213. **Project #19: Motion to Compel (May 21, 2020).** On May 21, 2020, Lead Plaintiff filed a letter motion seeking to compel production of Symantec's production of documents to SEC, Symantec's database of documents collected and reviewed in connection with its internal Audit Committee investigation, and certain search terms related to the revenue recognition allegations sustained by the Court. Lead Counsel spent a total of 152.75 hours with a lodestar of \$92,931.25 in researching and drafting the motion, conferring with Defendants in advance of the motion and preparing for and arguing the motion to compel itself.

c. Motion for Class Certification

214. **Project #20: Motion to Certify the Class (January 17, 2020).** On January 17, 2020, Lead Plaintiff filed its initial motion for certification of the Class. Lead Counsel spent a total of 151.25 hours with a lodestar of \$98,375.00 in researching and drafting the motion and accompanying documents. The work, the details of which are broken down chronologically in Exhibit 7, included legal research, drafting the motion, preparing supporting declarations from SEB and Lead Counsel, and reviewing and working on the expert report of Michael Hartzmark on

1 market efficiency and a common methodology for classwide damages that was filed with the
2 motion.

3 **215. Project #21: Class Certification Discovery (January 17, 2020).** Lead Counsel
4 spent a total of 392.5 hours with a lodestar of \$277,106.25 on matters related to class-certification
5 discovery, other than defending the deposition of Lead Plaintiff SEB (see Project #22 below). This
6 work, the details of which are broken down chronologically in Exhibit 7, included preparing for
7 and defending the deposition of Lead Plaintiff's market efficiency expert Michael Hartzmark, and
8 preparing for and taking the deposition of Defendants' expert, Douglas Skinner (which included
9 an extensive review of his prior opinions and work product), and related document productions.

10 **216. Project #22: Defending the Deposition of Caroline Rifall (February 5, 2020).**
11 Ms. Rifall is the Head of Legal at SEB. Mr. Rifall served as the corporate representative for the
12 Rule 30(b)(6) deposition of Lead Plaintiff taken by Defendants on February 5, 2020. Lead Counsel
13 spent a total of 130.5 hours preparing Ms. Rifall for and defending the deposition, resulting in
14 \$74,856.25 in lodestar. The work, the details of which are broken down chronologically in Exhibit
15 7, included work reviewing documents Defendants were likely to use at the deposition, meeting
16 with Ms. Rifall to prepare, and over 4.5 hours defending the deposition. Two attorneys from Lead
17 Counsel attended the deposition, the partner who defended the deposition and an associate who
18 assisted. Two associate attorneys attended for the Defendants.

19 **217. Project #23: Class Certification Reply (March 13, 2020).** Lead Plaintiff filed
20 its reply papers in support of the motion for certification of the Class on March 13, 2020. Lead
21 Counsel spent a total of 196.5 hours with a lodestar of \$113,586.75 on this project. This work, the
22 details of which are broken down chronologically in Exhibit 7, included reviewing and analyzing
23 Defendants' opposition papers, legal research on relevant issues, drafting the reply brief, assisting
24 in the preparation of a reply expert report from Michael Hartzmark, and preparing for possible oral
25 argument on the motion.

218. **Project #24: Class Certification Hearing Preparation.** As set forth in Exhibit 7, Lead Counsel spent 31.75 hours with a lodestar of \$28,887.50 preparing for oral argument on Lead Plaintiff's motion for class certification. Although the motion was ultimately decided without argument, a hearing had been scheduled and may have occurred on April 9, 2020. As such, Lead Counsel dedicated this time to reviewing the Parties' arguments and legal authorities and preparing for the hearing in anticipation of oral argument.

219. **Project #25: Class Certification Notice.** Following the Court's order certifying the Class, Lead Counsel drafted the Notice of Pendency of Class Action ("Class Notice") and oversaw its mailing to potential Class Members. Lead Counsel spent a total of 67.25 hours with a lodestar of \$48,593.75 on this project. This work, the details of which are broken down chronologically in Exhibit 7, included drafting the proposed Class Notice and summary publication notice, conferring with Defendants to obtain their agreement on this document; drafting and presenting to the Court a proposed Stipulation and Order approving the Notice; selecting a Notice Administrator to conduct the mailing; overseeing the work of the Notice Administrator in conducting the mailing; reviewing and compiling the requests for exclusion from the Class received; and overseeing the Notice Administrator's production of a declaration summarizing the notice mailing and the requests for exclusion received (filed on September 16, 2020).¹⁰

d. Initial Settlement Conference Before Magistrate Judge Ryu

220. **Project #26: Initial Settlement Conference (September 14, 2020).** In February 2020, the Court referred the Action to Judge Ryu to oversee settlement negotiations. Following a preliminary conference in March 2020, the settlement conference with Judge Ryu was initially scheduled for June 2020, then July 2020, and ultimately held on September 14, 2020 by videoconference (due to the COVID-19 pandemic). Lead Counsel spent a total of 420.75 hours with a lodestar of \$282,431.25 in connection with the initial settlement conference. This work,

¹⁰ No time spent on preparation and mailing of the Supplemental Class Notice, ordered by the Court in its April 20, 2021 order, has been included in Lead Counsel's application. The time noted here is all in connection with the original Class Notice mailed in 2020.

1 the details of which are broken down chronologically in Exhibit 7, included preparing for and
2 attending the initial scheduling conference with Judge Ryu, drafting a memo to the client and other
3 client communications concerning Lead Counsel's recommendations for settlement and settlement
4 authority, numerous communications with Defendants' Counsel related to possible settlement,
5 drafting a detailed mediation brief for submission to Judge Ryu as well as a private submission for
6 Judge Ryu's eyes only, preparing presentation materials for the settlement conference, and
7 participating in the settlement conference, as well as follow-on negotiations after the conference.

8 **221. Project #27: Consideration of Further Amendment of the Complaint.** While
9 fact discovery was ongoing, Lead Counsel held discussions and prepared an extensive memo
10 concerning the possibility of further amending the Complaint to reflect additional information
11 obtain during discovery. Lead Counsel spent a total of 100.5 hours with a lodestar of \$41,662.50
12 in connection with this project. This work, the details of which are broken down chronologically
13 in Exhibit 7, included strategic discussion regarding amendment, drafting a memo on the subject,
14 and gathering discovery documents supporting amendment.

15 **e. Fact Depositions**

16 **222.** As noted, Lead Counsel took a total of 20 depositions of fact witnesses in this
17 litigation. Each fact deposition is described in greater detail below. Due to the global pandemic
18 caused by COVID-19—and the need to quarantine for most of the fact discovery period in this
19 Action—all of these depositions were held remotely via Zoom video conference. This increased
20 the time and resources necessary to complete each deposition, including because of the need to
21 coordinate remotely and to ship witness kits to the examining attorneys in advance of each
22 deposition.

23 **223.** In addition, because the depositions were remote and held by videoconference, all
24 exhibits had to be introduced electronically, which required time and effort to upload each
25 document to the court reporter's (here, Veritext) videoconference platform and then to
26 electronically "mark" or introduce each specific document during the deposition. As such, Lead

1 Counsel found it reasonable and necessary for efficiency purposes to have two attorneys from Lead
2 Counsel attend each deposition—first, one attorney attended the deposition to examine the witness
3 and focus on the testimony and eliciting the evidence sought and, second, another attorney
4 (generally a more junior attorney or staff attorney) attended the deposition to focus on handling
5 the electronic documents to be used as exhibits at the deposition, including by uploading the
6 electronic versions to the videoconferencing platform, introducing them electronically at the
7 appropriate time during the deposition and handling the technical issues that could—and often
8 did—arise at remote depositions. If Lead Counsel had only one attorney handling both the
9 examination and the electronic documents at each deposition, there was a significant risk that the
10 deposition would not proceed efficiently—and the Class’s interests could be prejudiced.

11 224. **Project #28: Deposition of Former Employee 1 (FE1) (October 24, 2020).** FE1
12 was the whistleblower whose allegations of accounting misconduct triggered an SEC and Audit
13 Committee investigation. Lead Counsel spent a total of 120.25 hours preparing for and taking the
14 deposition, resulting in \$72,106.25 in lodestar. The work, the details of which are broken down
15 chronologically in Exhibit 7, included work reviewing relevant documents and culling potential
16 exhibits, preparing an examination outline, and more than four hours of questioning the witness
17 on the record. Two attorneys from Lead Counsel attended the deposition—one partner and one
18 associate. The partner took the deposition, and the associate handled the uploading of exhibits
19 onto the electronic platform. Four attorneys attended for Defendants, including three partners and
20 one associate.

21 225. **Project #29: Deposition of Miguel Jimenez (November 6, 2020).** Mr. Jimenez
22 is Symantec’s Senior Director of Financial Planning and Analysis. Lead Counsel spent a total of
23 103.5 hours preparing for and taking the deposition, resulting in \$66,337.50 in lodestar. The work,
24 the details of which are broken down chronologically in Exhibit 7, included work reviewing
25 relevant documents and culling potential exhibits, preparing an examination outline, and five hours
26 of questioning the witness on the record. Two attorneys and one paralegal from Lead Counsel

1 attended the deposition, the partner who took the deposition, an associate, and a paralegal who
2 assisted and handled the exhibits. Six attorneys attended for Defendants, including three partners
3 and three associates. This was the sole deposition that Lead Counsel had more than two people
4 attend. The reasons for this was that the associate who was managing the electronic documents
5 was having power outage issues just before the deposition. Accordingly, Lead Counsel had a
6 paralegal also attend the deposition in case the associate lost power and could no longer manage
7 the documents during the deposition. At the deposition, this in fact happened, as the associate lost
8 power and the paralegal had to step-in to manage the electronic documents.

9 226. **Project #30: Deposition of Michael Hannon (November 10, 2020).** Mr. Hannon
10 was Symantec's Senior Manager and then Director of SEC Reporting during the Class Period.
11 Lead Counsel spent a total of 134.5 hours preparing for and taking the deposition, resulting in
12 \$84,462.50 in lodestar. The work, the details of which are broken down chronologically in Exhibit
13 7, included work reviewing and culling potential exhibits, preparing an examination outline, and
14 six hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the
15 deposition, the senior counsel who took the deposition and an associate who assisted and handled
16 the exhibits. Six attorneys attended for Defendants, including two partners and four associates.

17 227. **Project #31: Deposition of Paul O'Brien (November 13, 2020).** Mr. O'Brien
18 was Symantec's Director of Finance and head of the Company's technical accounting team. Lead
19 Counsel spent a total of 73.5 hours preparing for and taking the deposition, resulting in \$58,318.75
20 in lodestar. The work, the details of which are broken down chronologically in Exhibit 7, included
21 work reviewing and culling potential exhibits, preparing an examination outline, and over 6.5
22 hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the
23 deposition, the partner who took the deposition and an associate who assisted and handled the
24 exhibits. Four attorneys attended for Defendants, including one partner, one counsel, and two
25 associates.

1 228. **Project #32: Deposition of Patricia Mora (November 18, 2020).** Ms. Mora is
2 Symantec's Senior Director of Technical Accounting and External Reporting. Lead Counsel spent
3 a total of 88.5 hours preparing for and taking the deposition, resulting in \$37,868.75 in lodestar.
4 The work, the details of which are broken down chronologically in Exhibit 7, included work
5 reviewing and culling potential exhibits, preparing an examination outline, and over six hours of
6 questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition,
7 the associate who took the deposition and a staff attorney who assisted and handled the exhibits.
8 Four attorneys attended for Defendants, including two partners, one counsel and one associate

9 229. **Project #33: Deposition of Abby Morrill (December 1, 2020).** Ms. Morrill was
10 Symantec's Director of Finance and head of the Company's technical accounting team. Lead
11 Counsel spent a total of 121 hours preparing for and taking the deposition, resulting in \$82,218.75
12 in lodestar. The work, the details of which are broken down chronologically in Exhibit 7, included
13 work reviewing and culling potential exhibits, preparing an examination outline, and five hours of
14 questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition,
15 the senior counsel who took the deposition and an associate who assisted and handled the exhibits.
16 Four attorneys attended for Defendants, including one partner and three associates.

17 230. **Project #34: Deposition of Sean Delehanty (December 5, 2020).** Mr. Delehanty
18 was a senior director of finance at Symantec during the Class Period. Lead Counsel spent a total
19 of 71 hours preparing for and taking the deposition, resulting in \$48,975.00 in lodestar. The work,
20 the details of which are broken down chronologically in Exhibit 7, included work reviewing and
21 culling potential exhibits, preparing an examination outline, and five hours of questioning the
22 witness on the record. Two attorneys from Lead Counsel attended the deposition, the partner who
23 took the deposition and an associate who assisted and handled the exhibits. Four attorneys attended
24 for Defendants, including two partners and two associates.

25 231. **Project #35: Deposition of Vivek Mani (December 12, 2020).** Mr. Mani was a
26 finance Vice President at Symantec. Lead Counsel spent a total of 120.75 hours preparing for and
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1 taking the deposition, resulting in \$49,493.75 in lodestar. The work, the details of which are
2 broken down chronologically in Exhibit 7, included work reviewing and culling potential exhibits,
3 preparing an examination outline, and over six hours of questioning the witness on the record.
4 Two attorneys from Lead Counsel attended the deposition, the associate who took the deposition
5 and a staff attorney who assisted and handled the exhibits. Five attorneys attended for Defendants,
6 including three partners, one counsel, and one associate.

7 **232. Project #36: Deposition of Matthew Brown (December 16, 2020).** Mr. Brown
8 was Symantec's corporate controller and interim CFO. Lead Counsel spent a total of 52.75 hours
9 preparing for and taking the deposition, resulting in \$41,600.00 in lodestar. The work, the details
10 of which are broken down chronologically in Exhibit 7, included work reviewing and culling
11 potential exhibits, preparing an examination outline, and over seven hours of questioning the
12 witness on the record. Two attorneys from Lead Counsel attended the deposition, the partner who
13 took the deposition and an associate who assisted and handled the exhibits. Four attorneys attended
14 for Defendants, including two partners, one counsel, and one associate.

15 **233. Project #37: Deposition of Former Employee 2 (FE2) (December 22, 2020).**
16 FE2 was another former Symantec employee and whistleblower. Lead Counsel spent a total of
17 90.25 hours preparing for and taking the deposition of FE2, resulting in \$67,750.00 in lodestar.
18 The work, the details of which are broken down chronologically in Exhibit 7, included work
19 reviewing and culling potential exhibits, preparing an examination outline, and 6.5 hours of
20 questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition,
21 the partner who took the deposition and an associate who assisted and handled the exhibits. Five
22 attorneys attended for Defendants, including three partners and two associates.

23 **234. Project #38: Deposition of Madeline Wolf (January 7, 2021).** Ms. Wolf (who
24 used her maiden name, Maddy Gatto, at Symantec) was Symantec's Vice President, Finance and
25 Corporate Controller. Lead Counsel spent a total of 98 hours preparing for and taking the
26 deposition, resulting in \$68,837.50 in lodestar. The work, the details of which are broken down
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1 chronologically in Exhibit 7, included work reviewing and selecting exhibits, preparing an
2 examination outline, and 4.5 hours of questioning the witness on the record. Two attorneys from
3 Lead Counsel attended the deposition, the senior counsel who took the deposition and an associate
4 who assisted and handled the exhibits. Four attorneys attended for the defendants, including one
5 partners, one of counsel, and two associates.

6 **235. Project #39: Deposition of Michael Fey (January 8, 2021).** Mr. Fey was
7 Symantec's President and Chief Operating Officer during the Class Period. Lead Counsel spent a
8 total of 76.25 hours preparing for and taking the deposition, resulting in \$53,131.25 in lodestar.
9 The work, the details of which are broken down chronologically in Exhibit 7, included work
10 reviewing and culling potential exhibits, preparing an examination outline, and nearly seven hours
11 of questioning the witness on the record. Two attorneys from Lead Counsel attended the
12 deposition, the partner who took the deposition and an associate who assisted and handled the
13 exhibits. Five attorneys attended for the defendants, including two partners and three associates.

14 **236. Project #40: Deposition of James Dildine (January 11, 2021).** Mr. Dildine was
15 CFO of Symantec's Enterprise Security business during the Class Period. Lead Counsel spent a
16 total of 86.25 hours preparing for and taking the deposition, resulting in \$60,693.75 in lodestar.
17 The work, the details of which are broken down chronologically in Exhibit 7, included work
18 reviewing and culling potential exhibits, preparing an examination outline, and nearly seven hours
19 of questioning the witness on the record. Two attorneys from Lead Counsel attended the
20 deposition, the partner who took the deposition and an associate who assisted and handled the
21 exhibits. Four attorneys attended for Defendants, including one partner, one counsel, and two
22 associates.

23 **237. Project #41: Deposition of Matthew MacKenzie (January 13, 2021).** Mr.
24 MacKenzie was Symantec's Chief of Staff during the Class Period. Lead Counsel spent a total of
25 83 hours preparing for and taking the deposition, resulting in \$51,806.25 in lodestar. The work,
26 the details of which are broken down chronologically in Exhibit 7, included work reviewing and
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1 culling potential exhibits, preparing an examination outline, and seven hours of questioning the
2 witness on the record. Two attorneys from Lead Counsel attended the deposition, the senior
3 counsel who took the deposition and an associate who assisted and handled the exhibits. Four
4 attorneys attended for Defendants, including two partners and two associates.

5 **238. Project #42: Deposition of Mark Garfield (January 16, 2021).** Mr. Garfield was
6 Symantec's Chief Accounting Officer during the beginning the Class Period and was a former
7 defendant in this Action who was dismissed by the Court's October 2, 2019 order. Lead Counsel
8 spent a total of 92.75 hours preparing for and taking the deposition, resulting in \$64,087.50 in
9 lodestar. The work, the details of which are broken down chronologically in Exhibit 7, included
10 work reviewing and culling potential exhibits, preparing an examination outline, and 6.5 hours of
11 questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition,
12 the partner who took the deposition and an associate who assisted and handled the exhibits. Six
13 attorneys attended for the defendants, including three partners, one counsel, and two associates.

14 **239. Project #43: Deposition of Nicholas Noviello (January 19, 2021).** Mr. Noviello
15 was Symantec's Chief Financial Officer during the Class Period and was a former defendant in
16 this Action who was dismissed by the Court's October 2, 2019 order. Lead Counsel spent a total
17 of 77.25 hours preparing for and taking the deposition, resulting in \$54,768.75 in lodestar. The
18 work, the details of which are broken down chronologically in Exhibit 7, included work reviewing
19 and culling potential exhibits, preparing an examination outline, and 7.5 hours of questioning the
20 witness on the record. Two attorneys from Lead Counsel attended the deposition, the senior
21 counsel who took the deposition and an associate who assisted and handled the exhibits. Four
22 attorneys attended for Defendants, including three partners and one associate.

23 **240. Project #44: Deposition of Gregory Clark (January 22, 2021).** Mr. Clark was
24 Symantec's former CEO and a named defendant in this Action. Lead Counsel spent a total of 95
25 hours preparing for and taking the deposition, resulting in \$68,793.75 in lodestar. The work, the
26 details of which are broken down chronologically in Exhibit 7, included work reviewing and
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1 culling potential exhibits, preparing an examination outline, and more than eight hours of
2 questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition,
3 the partner who took the deposition and an associate who assisted and handled the exhibits. Five
4 attorneys attended for Defendants, including three partners and two associates.

5 **241. Project #45: Rule 30(b)(6) Deposition of Ernst & Young (EY) (January 26,**
6 **2021).** EY performed various accounting consulting projects for Symantec during the Class
7 Period, including a review of its T&T expenses. Lead Counsel spent a total of 105.5 hours
8 preparing for and taking the deposition, resulting in \$45,437.50 in lodestar. The work, the details
9 of which are broken down chronologically in Exhibit 7, included work reviewing and culling
10 potential exhibits, preparing an examination outline, and 5.5 hours of questioning the witness on
11 the record. One attorney and one paralegal from Lead Counsel attended the deposition, the
12 associate who took the deposition and a paralegal who assisted and handled the exhibits. Four
13 attorneys attended for Defendants, including one partner, one counsel, and two associates.

14 **242. Project #46: Rule 30(b)(6) Deposition of KPMG (January 29, 2021).** KPMG
15 was Symantec's independent auditor during the Class Period. Lead Counsel spent a total of 135.75
16 hours preparing for and taking the deposition, resulting in \$77,975.00 in lodestar. The work, the
17 details of which are broken down chronologically in Exhibit 7, included work reviewing relevant
18 documents and culling potential exhibits, preparing an examination outline, and 4.5 hours of
19 questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition,
20 the senior counsel who took the deposition and a staff attorney who assisted and handled the
21 exhibits. Four attorneys attended for Defendants, including two partners and two associates.

22 **243. Project #47: Deposition of Anita Sands (March 1, 2021).** Ms. Sands was a
23 member of Symantec Board of Directors and a member of the Board's Audit Committee. Lead
24 Counsel spent a total of 71 hours preparing for and taking the deposition, resulting in \$37,887.50
25 in lodestar. The work, the details of which are broken down chronologically in Exhibit 7, included
26 work reviewing and culling potential exhibits, preparing an examination outline, and seven hours

1 of questioning the witness on the record. Two attorneys from Lead Counsel attended the
2 deposition, the partner who took the deposition and an associate who assisted and handled the
3 exhibits. Five attorneys attended for Defendants, including three partners and two associates.

4 **f. Projects Related to Expert Discovery & Expert Depositions**

5 **244. Project #48: Work with Compensation Expert Wayne R. Guay and**
6 **Preparation of His Expert Reports.** Dr. Guay was Lead Plaintiff's executive compensation
7 expert. Lead Counsel spent a total of 37 hours, with a lodestar of \$30,587.50 consulting with Dr.
8 Guay during the litigation and working with him in connection with the preparation of his opening
9 and reply expert reports.

10 **245. Project #49: Expert Deposition of Wayne R. Guay (February 24, 2021).** Lead
11 Counsel also spent a total of 35.25 hours in preparing Dr. Guay for and defending the deposition,
12 resulting in \$19,018.75 in lodestar. The work, the details of which are broken down
13 chronologically in Exhibit 7, included work reviewing documents Defendants were likely to use
14 at the deposition, meeting with Dr. Guay and engaging in mock cross-examination sessions, and
15 5.5 hours defending the deposition. One associate from Lead Counsel attended and defended the
16 deposition. Four attorneys attended for Defendants, including one partner, one counsel, and two
17 associates.

18 **246. Project #50: Work with Economic Expert Michael Hartzmark and**
19 **Preparation of His Expert Reports.** Dr. Hartzmark was Lead Plaintiff's economic expert,
20 opining on market efficiency, loss-causation, and damages. Lead Counsel spent a total of 54.25
21 hours, with a lodestar of \$45,493.75 consulting with Dr. Hartzmark during the litigation and
22 working with him in connection with the preparation of his opening and reply expert reports.

23 **247. Project #51: Expert Deposition of Michael Hartzmark (February 25, 2021).**
24 Lead Counsel spent a total of 49 hours in preparing Dr. Hartzmark for and defending the
25 deposition, resulting in \$36,243.75 in lodestar. The work, the details of which are broken down
26 chronologically in Exhibit 7, included work reviewing documents that Defendants were likely to

1 use at the deposition, meeting with Dr. Hartzmark and engaging in mock cross-examination
2 sessions, and over 6.5 hours defending the deposition. One senior counsel from Lead Counsel
3 attended and defended the deposition. Four attorneys attended for Defendants, including one
4 partner, one counsel, and one associate.

5 248. **Project #52: Work with Accounting Expert Andrew Mintzer and Preparation**
6 **of His Expert Reports.** Mr. Mintzer was Lead Plaintiff's accounting expert. Lead Counsel spent
7 a total of 107.75 hours, with a lodestar of \$85,018.75 consulting with Mr. Mintzer during the
8 litigation and working with him in connection with the preparation of his opening and reply expert
9 reports.

10 249. **Project #53: Expert Deposition of Andrew Mintzer (March 2, 2021).** Lead
11 Counsel spent a total of 122 hours in preparing Mr. Mintzer for and defending the deposition,
12 resulting in \$66,800 in lodestar. The work, the details of which are broken down chronologically
13 in Exhibit 7, included work reviewing documents Defendants were likely to use at the deposition,
14 meeting with Mr. Mintzer and engaging in mock cross-examination sessions, and over six hours
15 defending the deposition. One senior counsel from Lead Counsel attended and defended the
16 deposition. Four attorneys attended for Defendants, including two partners and two associates.

17 250. **Project #54: Expert Deposition of Todd Milbourn (March 3, 2021).** Dr.
18 Milbourn was Defendants' expert on executive compensation plans. Lead Counsel spent a total
19 of 77.5 hours preparing for and taking the deposition, resulting in \$34,362.50 in lodestar. The
20 work, the details of which are broken down chronologically in Exhibit 7, included reviewing the
21 expert report he submitted, preparing an examination outline, and five hours of questioning the
22 witness on the record. Two attorneys from Lead Counsel attended the deposition, the associate
23 who took the deposition and a staff attorney who assisted and handled the exhibits. Four attorneys
24 attended for Defendants, including two partners, one counsel, and one associates.

25 251. **Project #55: Expert Deposition of Howard Scheck (March 4, 2021).** Mr. Scheck
26 was defendants' accounting expert. Lead Counsel spent a total of 68.5 hours preparing for and
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1 taking the deposition, resulting in \$48,968.75 in lodestar. The work, the details of which are
2 broken down chronologically in Exhibit 7, included work reviewing and culling potential exhibits,
3 preparing an examination outline, and six hours of questioning the witness on the record. Two
4 attorneys from Lead Counsel attended the deposition, the senior counsel who took the deposition
5 and an associate who assisted and handled the exhibits. Four attorneys attended for Defendants,
6 including two partners and two associates.

7 **252. Project #56: Expert Deposition of Douglas Skinner (March 5, 2021).** Dr.
8 Skinner was Defendants' economic expert, retained to rebut Lead Plaintiff's economic expert's
9 opinions on damages and loss causation. Lead Counsel spent a total of 67 hours preparing for and
10 taking the deposition, resulting in \$48,681.25 in lodestar. The work, the details of which are
11 broken down chronologically in Exhibit 7, included work reviewing and culling potential exhibits,
12 preparing an examination outline, and nearly seven hours of questioning the witness on the record.
13 Two attorneys from Lead Counsel attended the deposition, the partner who took the deposition
14 and an associate who assisted and handled the exhibits. Three attorneys attended for Defendants,
15 including one partner, one counsel, and one associate.

16 **g. Additional Settlement Negotiations**

17 **253. Project #57: Ongoing Settlement Negotiations.** After the September 14, 2020
18 settlement conference with Judge Ryu and prior to the second such conference on May 24, 2021,
19 Lead Counsel and counsel for Defendants had ongoing, intermittent discussions concerning the
20 possibility of settlement. Lead Counsel spent a total of 10.5 hours with a lodestar of \$11,868.75
21 in connection with these ongoing settlement negotiations during that period, including internal
22 discussions concerning settlement, as well as with Defendants' Counsel.

23 **h. Opposition to Motion for Summary Judgment**

24 **254. Project #58: Opposition to Motion for Summary Judgment (March 18, 2021):**
25 Defendants filed their motion for summary judgment on March 4, 2021; Lead Plaintiff filed its
26 opposition on March 18, 2021; and Defendants filed their reply papers on March 25, 2021. Lead
27

Counsel spent a total of 2,827.25 hours with a lodestar of \$1,303,300.00 in connection with Defendants' summary judgment motion. This work, the details of which are broken down chronologically in Exhibit 7, included an extensive review and analysis of the documentary evidence and testimony gathered to locate the best evidence in opposition to summary judgment, preparing detailed statements of fact, researching and preparing an extensive opposition brief, and preparing electronic versions of the briefs filed. It also includes related work on scheduling issues, and arranging for filing of certain documents under seal. This work also includes Lead Counsel's extensive preparation for oral argument on Defendants' summary judgment motion, until it was eventually continued to July 7, 2021 (ECF No. 388).

i. Trial Preparation Projects

255. **Project #59: Draft Jury Instructions:** As set forth in Exhibit 7, Lead Counsel spent 12.25 hours with a lodestar of \$9,800.00 researching and drafting proposed jury instructions in preparation for trial.

256. **Project #60: Special Verdict Form:** As set forth in Exhibit 7, Lead Counsel spent 5.75 hours with a lodestar of \$4,600.00 researching and drafting a proposed Special Verdict Form in preparation for trial.

257. **Project #61: Trial Exhibit List:** Lead Counsel spent a total of 1,354.75 hours with a lodestar of \$561,981.25 preparing a master list of potential trial exhibits. This work, the details of which are broken down chronologically in Exhibit 7, included an extensive review of key documents identified in the discovery process and used in depositions, culling selected exhibits, and creating a master document with key information about each potential exhibit.

258. **Project #62: Other Trial Preparations:** Lead Counsel spent a total of 123.25 hours with a lodestar of \$83,812.50 conducting other trial preparations in addition to the work on jury instructions, special verdict form and trial exhibit list previously discussed. This work, the details of which are broken down chronologically in Exhibit 7, included strategy sessions, planning for potential motions *in limine* and *Daubert* motions, and reviewing and analyzing key evidence.

259. **Project #63: Defendants' Motion for Partial Abeyance of Merit-Related Proceedings:** As set forth in Exhibit 7, Lead Counsel spent eight hours with a lodestar of \$8,200.00 in connection with Defendants' April 22, 2021 motion for a limited abeyance of merit-related proceedings pending the conclusion of the second opt-out period, and preparing for and attending an April 23, 2021 hearing on that motion.

j. **Second Settlement Conference and Final Settlement**

260. **Project #64: Second Settlement Conference (May 24, 2021):** The Parties held a second settlement conference before Magistrate Judge Ryu on May 24, 2021. Lead Counsel spent a total of 125 hours with a lodestar of \$112,100.00 in connection with the second settlement conference. This work, the details of which are broken down chronologically in Exhibit 7, included drafting a memo to the client and other client communications concerning Lead Counsel's recommendations for settlement and settlement authority, drafting a demand letter and a private submission for Judge Ryu's eyes only, and preparing for and participating in the settlement conference.

261. **Project #65: Settlement Term Sheet (Executed May 26, 2021):** Following their agreement in principle to settle reached at the second settlement conference with Judge Ryu, the Parties negotiated a Term Sheet and executed it on May 26, 2021. Lead Counsel spent a total of 8.75 hours with a lodestar of \$8,256.25 in drafting and negotiating the settlement term sheet.

262. **Project #66: Settlement Stipulation and Exhibits (Executed June 8, 2021):** Lead Counsel spent a total of 50 hours with a lodestar of \$41,487.50 in connection with drafting and negotiating the definitive settlement agreement, the Stipulation and Agreement of Settlement, and its exhibits and related papers with Defendants. This work, the details of which are broken down chronologically in Exhibit 7, included drafting and negotiating the Stipulation, the proposed Preliminary Approval Order and Judgment, the proposed Settlement Notice, Claim Form, and Summary Settlement Notice, and the Supplemental Agreement concerning Symantec's right to

1 terminate the Settlement if additional requests for exclusion meet a certain threshold. No work
2 after June 8, 2021 is included in Lead Counsel's application.

3 **k. Ongoing Projects Throughout the Litigation**

4 263. **Project #67: Strategy:** As set forth in Exhibit 7, Lead Counsel spent 166 hours
5 with a lodestar of \$146,381.25 on high-level strategy discussions and analysis, not directly tied to
6 one of the forementioned litigation projects.

7 264. **Project #68: Client Communications:** As set forth in Exhibit 7, Lead Counsel
8 spent 10.25 hours with a lodestar of \$9,068.75 providing Lead Plaintiff SEB with periodic updates
9 on the status of case not directly tied to one of the forementioned litigation projects.

10 265. **Project #69: Preparation of Depositions Kits:** Prior to each of the depositions
11 Lead Counsel's Staff Attorneys conducted extensive reviews of the documents produced by
12 Defendants and third parties to identify documents that could potentially be of use in conducting
13 each deposition. In total, Lead Counsel spent 8,993.75 hours with a lodestar of \$3,577,975.00 on
14 this work. This work, the details of which are broken down chronologically in Exhibit 7, included
15 reviewing, analyzing culling, and organizing documents for potential use in deposition
16 preparation.

17 266. **Project #70: Discovery (General):** Lead Counsel spent 2,271.50 hours with a
18 lodestar of \$1,207,875.00 on other general discovery matters, not including in one of the foregoing
19 projects. This work, the details of which are broken down chronologically in Exhibit 7, included
20 preparing a protective order, assessing the discovery needed to prove Lead Plaintiff's claims,
21 analyzing, discussing, and negotiating the scope of discovery, including time periods, custodians
22 and search terms, general planning for depositions, general oversight and discovery strategy,
23 management of discovery, reviewing key evidence obtained, and other work.

24 267. **Project #71: Expert Work:** Lead Counsel spent 122 hours with a lodestar of
25 \$51,506.25 on work with experts not included in the prior projects. This work, the details of which
26
27

1 are broken down chronologically in Exhibit 7, included conferring with experts in analyzing the
2 claims and the discovery needed.

3 268. **Project #72: Miscellaneous and Administrative:** Lead Counsel spent 298.5
4 hours with a lodestar of \$112,603.75 on other miscellaneous or administrative matters, not
5 included in one of the foregoing projects. This work, the details of which are broken down
6 chronologically in Exhibit 7, included preparing and filing *pro hac vice* motions and notices of
7 appearance; updating calendars and schedules; organizing of documents, and updating and
8 maintaining the document database.

9 **3. The Quality of the Result Achieved by Lead Counsel**

10 269. The Settlement provides for a recovery of \$70 million for the benefit of the Class.
11 For the reasons set forth above and in light of the substantial risks of the litigation, Lead Counsel
12 believes that the Settlement represents a very favorable result for members of the Class. Indeed,
13 given the serious challenges that Lead Plaintiff faced in this case, including the formidable hurdles
14 discussed above, there was significant risk that there would be no recovery at all.

15 **4. The Skill and Experience of Lead Counsel**

16 270. The skill and expertise of Lead Counsel also supports the requested fee. Lead
17 Counsel has extensive experience in successfully prosecuting some of the largest and most
18 complex securities class actions in history, and is consistently ranked among the top plaintiffs'
19 firms in the country. A copy of Lead Counsel BLB&G's firm resume, which includes information
20 about the standing of the firm is attached as Exhibit 6 hereto. Brief biographical summaries for
21 each attorney and other timekeeper listed in Exhibit 3, including information about their position,
22 education, and relevant experience, is set forth in Exhibit 5. As demonstrated by the firm resume,
23 BLB&G is among the most experienced and skilled law firms in the securities litigation field, with
24 a long and successful track record representing investors in such cases. BLB&G is consistently
25 ranked among the top plaintiffs' firms in the country. In addition, ISS/Securities Class Action
26 Services' 2021 report on the "Top 100 U.S. Class Action Settlements of All Time" shows that

1 BLB&G has been lead or co-lead counsel in more top recoveries than any other firm in history.
2 Further, BLB&G has taken complex cases such as this to trial, and it is among the few firms with
3 experience doing so on behalf of plaintiffs in securities class actions. I believe this willingness
4 and ability added valuable leverage in the settlement negotiations.

5 **5. Standing and Caliber of Defendants' Counsel**

6 271. The quality of the work performed by Lead Counsel in obtaining the Settlement
7 should also be evaluated in light of the quality of the opposition. Here, Defendants were primarily
8 represented in the litigation by numerous attorneys from Wilson Sonsini Goodrich & Rosati and
9 Morgan, Lewis & Bockius LLP, both prestigious and experienced firms, which vigorously and
10 ably defended the Action for three years. Against this formidable opposition, Lead Counsel
11 presented a case that was sufficiently strong that they were able to negotiate the substantial
12 recovery reflected in the proposed Settlement. In short, Lead Counsel faced very high-quality
13 opposition in this case, which further supports the requested fee.

14 **6. The Fully Contingent Fee and the Extensive Risks of the Litigation**

15 272. This prosecution was undertaken by Lead Counsel on an entirely contingent-fee
16 basis. The extensive risks taken by Plaintiffs in bringing those claims are detailed above and those
17 same risks are equally relevant to an award of attorneys' fees.

18 273. From the outset, Lead Counsel understood that they were embarking on a complex,
19 expensive and likely lengthy litigation with no guarantee of compensation for the substantial
20 investment of time, money and effort that the case would require. Lead Counsel understood that
21 Defendants would raise numerous challenges to liability, damages, and class certification, and that
22 there was no assurance of success.

23 274. In undertaking the responsibility of prosecuting this Action, Lead Counsel ensured
24 that ample resources were dedicated to it, and that funds were available to compensate staff and to
25 advance the significant expenses that a case of this magnitude and complexity requires. Indeed,
26 for three years, Lead Counsel vigorously prosecuted this Action for the benefit of the Class and
27 received no compensation, while incurring over \$2 million in expenses.

1 275. Lead Counsel bore the risk that no recovery would be achieved. Indeed, this case
2 presented numerous risks that could have prevented any recovery whatsoever. Despite the
3 vigorous efforts of Lead Counsel, success in contingent litigation such as this is never assured.
4 Lead Counsel firmly believes that the commencement of a securities class action, or the survival
5 of a class action after a motion to dismiss, does not guarantee settlement. To the contrary, it takes
6 hard work and diligence by skilled counsel to develop facts and theories that are needed to induce
7 sophisticated defendants to engage in serious settlement negotiations involving significant sums
8 of money.

9 276. Moreover, the United States Supreme Court and numerous other courts have
10 repeatedly recognized that the public has a strong interest in having experienced and able counsel
11 enforce the federal securities laws through private actions. *See, e.g., Bateman Eichler, Hill*
12 *Richards, Inc. v. Berner*, 472 U.S. 299, 310 (1985) (private securities actions provide “‘a most
13 effective weapon in the enforcement of the securities laws and are a ‘necessary supplement to
14 [SEC] action.’”) (citation omitted). Further, as Congress recognized through the passage of the
15 PSLRA, vigorous private enforcement of the securities laws can only occur if private plaintiffs,
16 particularly institutional investors, take an active role in prosecuting securities class actions. If
17 this important public policy is to be carried out, it is essential that plaintiffs’ counsel be adequately
18 compensated for undertaking actions with significant risk and achieving remarkable results, as
19 Lead Counsel did here.

20 **7. Lead Plaintiff’s Endorsement of the Fee Application**

21 277. Lead Plaintiff is a highly sophisticated institutional investor that closely supervised
22 and monitored both the prosecution and the settlement of this Action. Lead Plaintiff has evaluated
23 the Fee Application and believes it to be fair and reasonable. As set forth in the declaration
24 submitted by Lead Plaintiff, it has concluded that the requested fee has been earned based on the
25 favorable recovery obtained for the Class in a case that involved serious risk and the quality,
26 amount and significance of the work performed by Lead Counsel on behalf of the Class. *See* Rifall

Decl. (Ex. 1 hereto), at ¶ 7. Accordingly, Lead Plaintiff's endorsement of Lead Counsel's fee request further demonstrates its reasonableness and weighs in favor of approval.

278. In addition, the requested fee of 19% of the Settlement Fund is made pursuant to a pre-litigation fee agreement between Lead Plaintiff and Lead Counsel. Based on the stage of the litigation at which the Settlement was reached, Lead Counsel was permitted to apply for a fee of 19% under the agreement. While the ultimate award of the attorney fee is left to the sound discretion of the Court, the fact that the requested fee is consistent with an agreement that was negotiated and agreed to by a sophisticated institutional investor at the outset of the litigation provides further confirmation of its reasonableness—as does the fact that enforcement of the fee agreement results in a negative lodestar multiplier.

8. The Reaction of the Class to the Fee Application to Date

279. As noted above, as of December 29, 2021, over 169,000 Settlement Notice Packets had been mailed to potential Class Members advising them that Lead Counsel would apply for an award of attorneys' fees in an amount not to exceed 19% of the Settlement Fund. *See* Miller Decl. (Ex. 2 hereto), at ¶ 5; Miller Decl. Ex. A, at ¶¶ 5, 76. In addition, the Court-approved Summary Settlement Notice was published in both *The Wall Street Journal* and the *Financial Times*, and transmitted over the *PR Newswire*. *Id.* ¶ 6.

280. To date, no objections to the attorneys' fees set forth in the Settlement Notice have been received. Any objections that may be subsequently received after the date of this filing will be addressed in Lead Counsel's reply papers, which will be filed on February 3, 2022.

281. In sum, Lead Counsel accepted this case on a contingency basis, committed significant resources to it, and prosecuted it vigorously for three years without any compensation or guarantee of success. Based on the favorable result obtained, the quality of the work performed, the risks of the Action, and the contingent nature of the representation, Lead Counsel respectfully submits that a fee award of 19%, resulting in a negative multiplier of 0.66 is fair and reasonable, and is amply supported by the fee awards courts have granted in other comparable cases.

B. The Litigation Expense Application

282. Lead Counsel also seeks payment from the Settlement Fund of \$2,000,208.69 in litigation expenses that were reasonably incurred by Lead Counsel in connection with commencing, litigating, and settling the claims asserted in this Action.

283. From the beginning of the case, Lead Counsel was aware that they might not recover any of their expenses and, even in the event of a recovery, would not recover any of their out-of-pocket expenditures until such time as the Action might be successfully resolved. Lead Counsel also understood that, even assuming that the case was ultimately successful, reimbursement for expenses would not compensate them for the lost use of the funds advanced by them to prosecute the Action. Accordingly, Lead Counsel were motivated to and did take appropriate steps to avoid incurring unnecessary expenses and to minimize costs without compromising the vigorous and efficient prosecution of the case.

284. As set forth in Exhibit 8 hereto, Lead Counsel has incurred a total of \$2,000,208.69 in unreimbursed litigation expenses in connection with the prosecution of the Action. These expenses are reflected on the books and records maintained by Lead Counsel. These books and records are prepared from expense vouchers, check records and other source materials, and provide an accurate accounting of the litigation expenses incurred in this matter. Exhibit 8 identifies the specific category of expense, *e.g.*, on-line research, experts' fees, out-of-town travel costs, photocopying, telephone, fax and postage expenses, and other costs actually incurred for which counsel seek payment. These expense items are billed separately by Lead Counsel, and such charges are not duplicated in Lead Counsel's hourly rates.

285. None of the expenses that were incurred specifically in connection with the alleged conflict-of-interest issue, for example (a) costs relating to the three depositions taken in connection with that issue, and (b) fees Lead Counsel paid to retain and consult with experts in legal ethics related to that issue, have been included in Lead Counsel's request for payment of expenses. All

1 of these costs have been borne solely by Lead Counsel. Lead Counsel has also exclusively borne
2 the costs of the notice program ordered by the Court in its April 20, 2021 Order. ECF No. 380.

3 286. Of the total amount of expenses, \$1,656,966.55, or 83%, was expended on Lead
4 Plaintiff's experts and consultants, including (a) Lead Plaintiff's accounting expert Andrew
5 Mintzer of Hemming Morse LLP (\$824,340.75); (b) Lead Plaintiff's executive compensation
6 expert, Dr. Wayne Guay of Charles River Associates (\$388,036.00); (c) Lead Plaintiff's financial
7 economics expert, Dr. Michael Hartzmark of Hartzmark Economics Litigation Practice
8 (\$404,777.30); and (g) Lead Plaintiff's consulting expert on damages, Chad Coffman of Global
9 Economics Group LLC (\$39,812.50). Further details concerning the essential work these experts
10 performed for the benefit of the Class is discussed above and in Exhibit 10.

11 287. Another substantial litigation expense was online legal and factual research. The
12 on-line research conducted by Lead Counsel was necessary to its factual investigation of the
13 claims, the preparation of the Complaint, responding to Defendants' motions to dismiss, and to
14 litigate class certification, the contested discovery motion, and the summary judgment motion.
15 The charges for on-line legal and factual research together amounted to \$86,072.61, or 4% of the
16 total expenses. These are the amounts that were charged to Lead Counsel by their vendors; Lead
17 Counsel does not impose any surcharges or otherwise make any profit from these services. When
18 BLB&G utilizes online services provided by a vendor with a flat-rate contract, access to the service
19 is by a billing code entered for the specific case being litigated. At the end of each billing period,
20 BLB&G's costs for such services are allocated to specific cases based on the percentage of use in
21 connection with that specific case in the billing period.

22 288. Another large component of the expenses, \$39,247.92, or 2%, was for the costs
23 associated with establishing and maintaining the internal document database to process and review
24 the vast amount of documents produced in this Action, and related litigation support costs.
25 BLB&G charges a rate of \$4 per gigabyte of data per month and \$17 per user to recover the costs
26 associated with maintaining its document database management system, which includes the costs

1 to BLB&G of necessary software licenses and hardware. BLB&G has conducted a review of
2 market rates charged for the similar services performed by third-party document management
3 vendors and found that its rate was at least 80% below the market rates charged by these vendors,
4 resulting in savings to the Class. This category of expenses also includes the costs of preparing
5 electronic briefs for filing with the Court.

6 289. The other expenses for which Lead Counsel seeks payment are the types of
7 expenses that are necessarily incurred in litigation and routinely charged to clients billed by the
8 hour. These expenses include, among others, court fees, costs of out-of-town travel, miscellaneous
9 copying costs, long distance telephone and facsimile charges, and postage and delivery expenses.
10 Here is some further information about certain of these expenses:

11 a. **Internal Copying & Printing** (\$14,336.80). Our firm charges \$0.10 per page for
12 in-house copying and for printing of documents.

13 b. **Working Meals** (\$5,556.36). Working meals are capped at \$20 per person for
14 lunch and \$30 per person for dinner.

15 c. **Out-of-Town Travel** (\$25,972.88). As detailed in Exhibit 9, BLB&G's seeks
16 reimbursement of \$25,972.88 in travel costs incurred in connection with travel by Lead
17 Counsel and representatives of Lead Plaintiff, including travel to attend Court hearings on
18 the lead plaintiff motion, the motions to dismiss, and the motion to amend the complaint,
19 as well as a status conference; travel for Lead Plaintiff to conduct interviews with
20 prospective lead counsel in New York; and travel for three depositions conducted in
21 person, before the Covid-19 pandemic caused the remainder of depositions to be conducted
22 remotely. Airfare for Lead Counsel is at coach rates, hotel charges per night are capped at
23 \$350; and travel meals are capped at \$20 per person for breakfast, \$25 per person for lunch,
24 and \$50 per person for dinner.

25 d. **Special Counsel** (\$11,885.00). Lead Counsel incurred \$11,885.00 in attorneys'
26 fees for the retention of independent counsel, Calcani & Kanefsky LLP, to represent former
27

Symantec employees that Lead Counsel contacted during the course of its investigation and who wished to be represented by independent counsel, including due to concerns about speaking with Lead Counsel and/or becoming involved in this litigation.

290. All of the litigation expenses incurred by Lead Counsel were reasonably necessary to the successful litigation of this Action, and have been approved by Lead Plaintiff.

291. The Settlement Notice informed potential Class Members that Lead Counsel would be seeking payment of Litigation Expenses in an amount not to exceed \$2,500,000. The total amount requested, \$2,000,208.69, is *significantly* below the \$2,500,000 that Class Members were advised could be sought and, to date, no objection has been raised as to the maximum amount of expenses set forth in the Settlement Notice.

292. In view of the complex nature of the Action, the expenses incurred by Lead Counsel were reasonable and necessary to represent the Class and achieve the Settlement. Accordingly, Lead Counsel respectfully submits that the Litigation Expenses incurred by are fair and reasonable and should be paid in full from the Settlement Fund.

293. Attached hereto are true and correct copies of the following documents cited in the Settlement Memorandum and Fee Memorandum:

Exhibit 13	Cornerstone Research, Securities Class Action Settlements: 2020 Review and Analysis (2021)
Exhibit 14	<i>Luna v. Marvell Tech. Grp.</i> , Case No. 3:15-cv-05447-WHA, slip op. (N.D. Cal. Apr. 20, 2018), ECF No. 235
Exhibit 15	<i>In re Snap Inc. Sec. Litig.</i> , Case No. 2:17-cv-03679-SVW-AGR, slip op. (C.D. Cal. Mar. 9, 2021), ECF No. 400
Exhibit 16	<i>In re Allergan, Inc. Proxy Violation Sec. Litig.</i> , No. 8:14-cv-02004-DOK-KES, slip op. (C.D. Cal. Aug. 14, 2018), ECF No. 637
Exhibit 17	<i>In re Int'l Rectifier Corp. Sec. Litig.</i> , No. 07-02544, slip op. (C.D. Cal. Feb. 8, 2010), ECF No. 316
Exhibit 18	<i>In re Brocade Sec. Litig.</i> , No.: 3:05-CV-02042-CRB, slip op. (N.D. Cal. Jan. 26, 2009), ECF No. 496-1

- 1 Exhibit 19 *In re SunEdison, Inc. Sec. Litig.*, No. 1:16-md-2742-PKC, slip op.
(S.D.N.Y. Oct. 25, 2019), ECF No. 672
- 2 Exhibit 20 *San Antonio Fire & Police Pension Fund v. Dole Food Co.*, No. 1:15-cv-
3 1140-LPS, slip op. (D. Del. July 18, 2017), ECF No. 100
- 4 Exhibit 21 *Freudenberg v. E*Trade Fin. Corp.*, No. 07 Civ. 8538 (JPO) (MHD), slip
5 op. (S.D.N.Y. Oct. 20, 2012), ECF No. 154
- 6 Exhibit 22 *In re Tremont Sec. Law, State Law & Ins. Litig.*, No. 08 Civ. 11117
(TPG), slip op. (S.D.N.Y. Aug. 19, 2011), ECF No. 603
- 7 Exhibit 23 *Cornwell v. Credit Suisse Grp.*, No. 08-cv-03758 (VM), slip op. (S.D.N.Y.
8 July 18, 2011), ECF No. 117
- 9 Exhibit 24 *In re Tonopah Solar Energy, LLC*, Application for Retention of Counsel,
Case No. 20-11884 (KBO) (Bankr. D. Del. July 30, 2020), ECF No. 43

10
11 **VIII. CONCLUSION**

12 294. For all the reasons set forth above, Lead Plaintiff and Lead Counsel respectfully
13 submit that the Settlement and the Plan of Allocation should be approved as fair, reasonable, and
14 adequate. Lead Counsel further submits that the requested fee in the amount of 19% of the
15 Settlement Fund should be approved as fair and reasonable, and the request for payment of
16 litigation expenses in the amount of \$2,000,208.69 should also be approved.

17 I declare, under penalty of perjury under the laws of the United States that the foregoing is
18 true and correct.

19 DATED this 30th day of December, 2021 at New York, New York.

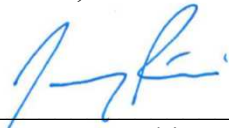
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21 _____
Jeremy P. Robinson

Exhibit 1

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

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Counsel for Plaintiff
SEB Investment Management AB

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SEB INVESTMENT MANAGEMENT AB,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

SYMANTEC CORPORATION and
GREGORY S. CLARK,

Defendants.

Case No. 3:18-cv-02902-WHA

ECF CASE

**DECLARATION OF CAROLINE
RIFALL, HEAD OF LEGAL AT SEB
INVESTMENT MANAGEMENT AB,
IN SUPPORT OF: (A) LEAD
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF SETTLEMENT AND
PLAN OF ALLOCATION; AND
(B) LEAD COUNSEL'S MOTION FOR
AN ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Dept.: Courtroom 12, 19th Floor
Judge: Honorable William Alsup

I, CAROLINE RIFALL, hereby declare as follows:

1. I am the Head of Legal at SEB Investment Management AB (“SEB” or “Lead Plaintiff”), the Court-appointed Lead Plaintiff in the above-captioned securities class action (the “Action”).¹ I submit this Declaration in support of (a) Lead Plaintiff’s motion for final approval of the proposed Settlement (“Settlement”) in this matter, and (b) Lead Counsel’s motion for attorneys’ fees and Litigation Expenses.

2. I am aware of and understand the requirements and responsibilities of a class representative in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 (“PSLRA”) and the guidance issued by this Court. I have knowledge of the matters set forth in this Declaration, and I could and would testify competently to these matters. I joined SEB in March 2019 and became involved in overseeing the prosecution of the Action. After I joined SEB, I was informed by my colleagues about matters that occurred in this litigation prior to March 2019. Since December 1, 2019, I have been the official at SEB responsible for overseeing the Action, working together with others at SEB, including, for example, my colleague, Mona Hall, Legal Counsel at SEB.

I. SEB’s Oversight of the Action

3. SEB is a Swedish limited liability company that manages investment funds. SEB is one of the largest institutional investment managers in Scandinavia, with over \$160 billion under management. SEB serves as investment manager for SEB Teknologifond and SEB Alternative Strategies SICAV, two funds which purchased Symantec common stock during the Class Period, and SEB is legally authorized to assert those funds’ claims in this Action.

4. On August 23, 2018, the Court entered an Order appointing SEB as the Lead Plaintiff in the Action pursuant to the PSLRA. Following its appointment, SEB publicly issued a request for proposals (“RFP”) for law firms to serve as lead counsel, and conducted extensive due diligence, including a review of competing submissions from several law firms, follow-up

¹ Unless otherwise defined in this Declaration, all capitalized terms have the meanings set out in the Stipulation and Agreement of Settlement dated June 8, 2021 (ECF No. 394-1).

1 questions, and in-person interviews with every candidate that responded to the RFP. SEB scored
2 each candidate and selected Bernstein Litowitz Berger & Grossmann LLP (“BLB&G”), which
3 achieved the highest score. On September 27, 2018, SEB moved for appointment of BLB&G as
4 Lead Counsel. On October 4, 2018, the Court entered an Order approving SEB’s selection of
5 BLB&G as Lead Counsel for the class.

6 5. SEB closely supervised, carefully monitored, and was actively involved in the
7 prosecution and resolution of the Action. Throughout the course of the Action, I and/or other SEB
8 personnel received periodic status reports from BLB&G on case developments and participated in
9 discussions with counsel concerning the prosecution of the Action, major litigation decisions, the
10 strengths and risks of the claims, and potential settlement. In particular, throughout the course of
11 this Action, I and/or other SEB personnel: (a) regularly met with and/or communicated with
12 BLB&G by in-person meetings, email, telephone calls and/or videoconferences regarding the
13 posture and progress of the case; (b) received and reviewed all significant pleadings and briefs
14 filed in this Action; (c) searched for and produced SEB’s documents in response to Defendants’
15 discovery requests; (d) attended major Court hearings both in person and by telephone;
16 (e) consulted with BLB&G concerning the settlement negotiations as they progressed; and
17 (f) evaluated and approved the proposed Settlement. In addition, I (g) reviewed and executed a
18 declaration in support of SEB’s motion for certification of the Class on January 14, 2020; (h) spent
19 time preparing with BLB&G for my deposition by Defendants in this case and traveling for that
20 deposition; (i) was deposed by counsel for Defendants in New York on February 5, 2020; and
21 (j) attended both mediation sessions with Magistrate Judge Donna M. Ryu, on September 14, 2020
22 and May 24, 2021, by video conference. The above-described work does not include anything
23 related to the alleged conflict issue raised by Robbins Geller Rudman & Dowd LLP.

24 **II. SEB Strongly Endorses Approval of the Settlement**

25 6. Based on its involvement throughout the prosecution and resolution of the Action,
26 SEB believes that the proposed Settlement is fair, reasonable, and adequate to the Class. SEB
27 believes that the Settlement represents a very favorable recovery for the Class given the substantial
28

1 risks and costs of continuing to prosecute the claims in this case. Therefore, SEB strongly endorses
2 approval of the Settlement by the Court.

3 **III. SEB Approves of And Supports Lead Counsel's Motion**
4 **for Attorneys' Fees and Litigation Expenses**

5 7. SEB understands that the determination of Lead Counsel's request for attorneys'
6 fees and expenses rests with the Court in its sound discretion. SEB believes and respectfully
7 submits that Lead Counsel's request for an award of attorneys' fees in the amount of 19% of the
8 Settlement Fund is fair and reasonable given the result achieved in the Action, the risks undertaken,
9 and the quality, amount and significance of the work performed by Lead Counsel on behalf of the
10 Class. The fee request is consistent with the retainer agreement entered into between SEB and
11 BLB&G at the outset of the Action. In addition, following the agreement to settle, SEB again
12 evaluated the fee request by considering the significant recovery obtained for the Class in this
13 Action, the risks of the Action, the stage of the Action, and the work performed by Lead Counsel,
14 and has authorized the 19% fee request to be submitted to the Court for its ultimate determination.

15 8. SEB further believes that Lead Counsel's Litigation Expenses are reasonable and
16 represent costs and expenses necessary for the prosecution and resolution of the claims in the
17 Action. Based on the foregoing, and consistent with its obligations to the Class, SEB fully supports
18 Lead Counsel's motion for attorneys' fees and Litigation Expenses.

19 **IV. Conclusion**

20 9. In conclusion, SEB, the Court-appointed Lead Plaintiff, which was actively
21 involved throughout the prosecution and settlement of the Action, strongly endorses the Settlement
22 as fair, reasonable, and adequate, and believes it represents a favorable recovery for the Class given
23 the risks of continued litigation. SEB further supports Lead Counsel's motion for attorneys' fees
24 and Litigation Expenses and believes that it represents fair and reasonable compensation for
25 counsel in light of the recovery obtained for the Class, the substantial work conducted, and the
26 litigation risks involved in this Action.

1 I declare under penalty of perjury under the laws of the United States of America, that the
2 foregoing is true and correct to the best of my knowledge.

3 Executed 28 December, 2021.

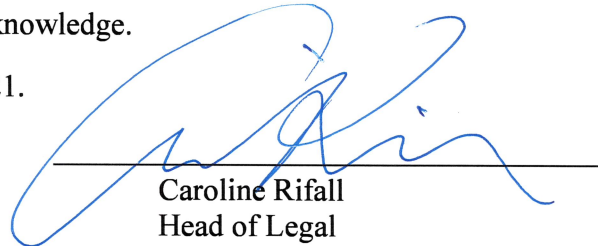
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5 Caroline Rifall
6 Head of Legal
7 SEB Investment Management AB
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Exhibit 2

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& GROSSMANN LLP**

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*Counsel for Lead Plaintiff
SEB Investment Management AB and
Lead Counsel for the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SEB INVESTMENT MANAGEMENT AB,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

SYMANTEC CORPORATION and
GREGORY S. CLARK,

Defendants.

Case No. 3:18-cv-02902-WHA

ECF CASE

**DECLARATION OF ERIC J. MILLER
REGARDING: (A) MAILING OF THE
SETTLEMENT NOTICE AND CLAIM
FORM; (B) PUBLICATION OF THE
SUMMARY SETTLEMENT NOTICE;
AND (C) REPORT ON REQUESTS
FOR EXCLUSION RECEIVED TO
DATE**

Dept.: Courtroom 12, 19th Floor
Judge: Honorable William Alsup

1 I, ERIC J. MILLER, hereby declare under penalty of perjury as follows:

2 1. I am a Senior Vice President of A.B. Data, Ltd.'s Class Action Administration
3 Company ("A.B. Data"), whose Corporate Office is located in Milwaukee, Wisconsin. The
4 following statements are based on my personal knowledge and information provided by other
5 A.B. Data employees working under my supervision, and if called on to do so, I could and would
6 testify competently thereto.

7 2. Pursuant to the Order Preliminary Approving Settlement and Providing for Notice
8 dated September 16, 2021 (ECF No. 411) (the "Preliminary Approval Order"), the Court approved
9 the retention of A.B. Data as the Claims Administrator in connection with the Settlement for the
10 above-captioned action (the "Action").¹ I am over 21 years of age and am not party to the Action.
11 I have personal knowledge of the facts set forth herein and, if called as a witness, could and would
12 testify competently thereto.

13 **DISSEMINATION OF THE NOTICE PACKET**

14 3. Pursuant to the Preliminary Order, A.B. Data mailed the Notice of (I) Proposed
15 Settlement and Plan of Allocation; (II) Settlement Fairness Hearing; and (III) Motion for
16 Attorneys' Fees and Litigation Expenses (the "Settlement Notice") and Proof of Claim and Release
17 Form (the "Claim Form" and, collectively with the Settlement Notice, the "Settlement Notice
18 Packet") to potential Class Members and nominees. A copy of the Settlement Notice Packet is
19 attached here to as Exhibit A.

20 4. On September 24, 2021, A.B. Data mailed a copy of the Settlement Notice Packet
21 to all persons and entities identified as potential Class Members in connection with the mailing of
22 the Original Class Notice in 2020 and the Supplemental Class Notice in 2021, as well as to A.B.
23 Data's database of banks, brokers, and other nominees. Consistent with Paragraph 5 of the
24 Preliminary Approval Order, nominees who were sent the Settlement Notice Packet were also sent

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27 ¹ Unless otherwise defined in this declaration, all capitalized terms have the meanings defined in
28 the Notice Order.

1 a letter explaining that if the nominee had previously submitted names and addresses in connection
2 with the mailing of the Original Class Notice or the Supplemental Class Notice, or had previously
3 requested copies of the Original Class Notice or the Supplemental Class Notice in bulk, it did not
4 need to submit that information again, unless it had additional names and addresses to provide, or
5 updated information, or needed a different number of notices.

6 5. Through December 29, 2021, A.B. Data has mailed a total of 169,578 Settlement
7 Notice Packets to potential members of the Class or their nominees, which includes (i) 162,865
8 Settlement Notice Packets that were mailed to potential Class Members and nominees in the initial
9 mailing on September 24, 2021; (ii) an additional 3,318 Settlement Notice Packets that were
10 mailed to potential Class Members whose names and addresses were received from individuals,
11 entities, or nominees requesting that the packet be mailed to such persons; and (iii) an additional
12 3,575 Settlement Notice Packets that were requested by nominees for forwarding to their
13 customers. In addition, A.B. Data has promptly re-mailed 2,554 Settlement Notice Packets to
14 persons whose original mailings were returned by the U.S. Postal Service (“USPS”) as
15 undeliverable and for whom updated addresses were provided to A.B. Data by the USPS. There
16 were 3,326 Settlement Notice Packets that were returned as undeliverable for which updated
17 addresses could not be found.

18 **PUBLICATION OF THE SUMMARY SETTLEMENT NOTICE**

19 6. Pursuant to the Preliminary Approval Order, A.B. Data caused the Summary
20 Settlement Notice to be published in the *Financial Times* on October 5, 2021 and in *The Wall*
21 *Street Journal* and transmitted over the *PR Newswire* on October 8, 2021. Copies of proof of
22 publication of the Summary Settlement Notice in the *Financial Times*, *The Wall Street Journal*,
23 and over the *PR Newswire* are attached to this declaration as Exhibits B, C, and D, respectively.

24 **WEBSITE**

25 7. On September 24, 2021, A.B. Data updated the website previously established for
26 this Action (www.SymantecSecuritiesLitigation.com) to provide Class Members with information
27 and documents concerning the proposed Settlement. The website address was set forth in the
28

1 Settlement Notice and the Summary Settlement Notice. The website provides the deadlines for
2 submitting a Claim, submitting an additional request for exclusion from the Class, or objecting to
3 the Settlement. The Settlement also makes available copies of the Settlement Notice and Claim
4 Form, as well as copies of the Stipulation of Settlement and Preliminary Approval Order, among
5 other documents. In addition, the website provides Settlement Class Members with the ability to
6 submit their Claim Form through the website and also includes a link to a document with detailed
7 instructions for institutions submitting their claims electronically. A.B. Data will continue
8 operating, maintaining, and updating the case website as appropriate.

9 **TOLL-FREE TELEPHONE LINE**

10 8. On September 24, 2021, A.B. Data updated the previously established toll-free
11 telephone number for the Action, 1-800-949-0206, to provide information about the proposed
12 Settlement. The toll-free telephone line connects callers with an Interactive Voice Recording
13 system (“IVR”). The IVR provides callers with pre-recorded information, including a summary
14 of the Action and the option to request a copy of the Settlement Notice Packet. In addition,
15 Monday through Friday from 9 a.m. to 6 p.m. Eastern Time (excluding official holidays), callers
16 to the toll-free telephone line can speak to a live operator regarding the status of the Action and/or
17 obtain answers to questions they may have about the Settlement.

18 **REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

19 9. The Settlement Notice provided potential Class Members a third opportunity to
20 request exclusion from the Class, and stated that if Class Members wished to exclude themselves,
21 they must mail a request for exclusion to A.B. Data, postmarked no later than January 13, 2022.
22 As of the date of this Declaration, A.B. Data has received an additional eight (8) requests for
23 exclusion from persons or entities who were not included in either of my prior reports on requests
24 for exclusions received (ECF Nos. 256, 397). A.B. Data will submit a supplemental declaration
25 after the January 13, 2022 deadline for requesting exclusion that will address all requests received.
26
27
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1 I declare, under penalty of perjury under the laws of the United States of America, that the
2 foregoing is true and correct to the best of my knowledge.

3 Executed on December 29, 2021.

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Eric J. Miller
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EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SEB INVESTMENT MANAGEMENT AB, individually
and on behalf of all other similarly situated,

Plaintiffs,

v.

SYMANTEC CORPORATION and GREGORY S.
CLARK,

Defendants,

Case No. 3:18-cv-02902-WHA

**NOTICE OF (I) PROPOSED SETTLEMENT AND PLAN OF
ALLOCATION; (II) SETTLEMENT FAIRNESS HEARING; AND
(III) MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

TO: All persons or entities who purchased or otherwise acquired publicly-traded Symantec Corporation ("Symantec") common stock during the period from May 11, 2017, to August 2, 2018, inclusive (the "Class Period"), and who were damaged thereby (the "Class").

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

NOTICE OF SETTLEMENT: This Notice has been sent to you pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Northern District of California (the "Court"). Please be advised that Lead Plaintiff SEB Investment Management AB ("SEB or "Lead Plaintiff"), on behalf of itself and the Court-certified Class (as defined in ¶ 28 below), has reached a proposed settlement of the above-captioned securities class action lawsuit ("Action") for a total of \$70,000,000 in cash that, if approved, will resolve all claims in the Action (the "Settlement"). The terms and provisions of the Settlement are contained in the Stipulation and Agreement of Settlement, dated June 8, 2021 (the "Stipulation").¹

This Notice is directed to you in the belief that you may be a member of the Class if you purchased or otherwise acquired Symantec common stock during the Class Period. If you do not meet the Class definition, or if you previously excluded yourself from the Class in connection with the Notice of Pendency of Class Action that was mailed to potential Class Members beginning in June 2020 (the "Original Class Notice") or the Supplemental Notice of Pendency of Class Action ("Supplemental Class Notice") that was mailed to potential Class Members beginning in May 2021, this Notice does not apply to you. A list of the persons and entities who previously requested exclusion from the Class is available at www.SymantecSecuritiesLitigation.com.

PLEASE READ THIS NOTICE CAREFULLY. This Notice explains important rights you may have, including the possible receipt of a payment from the Settlement. If you are a member of the Class, your legal rights will be affected whether or not you act.

¹ All capitalized terms used in this Notice that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation. The Stipulation is available at www.SymantecSecuritiesLitigation.com.

If you have any questions about this Notice, the proposed Settlement, or your eligibility to participate in the Settlement, please **DO NOT** contact the Court, Symantec, the other Defendants in the Action, or their counsel. All questions should be directed to Lead Counsel or the Claims Administrator (*see* ¶ 101 below).

1. **Description of the Action and the Class:** This Notice relates to a proposed settlement of claims in a pending securities class action brought by investors alleging, among other things, that Symantec and its former Chief Executive Officer Gregory S. Clark (“Clark” and, together with Symantec, “Defendants”) violated the federal securities laws by making false and misleading statements concerning Symantec’s financial results during the Class Period. A more detailed description of the Action is set forth in ¶¶ 11-27 below. The proposed Settlement, if approved by the Court, will settle claims of the Class, as defined in ¶ 28 below. Only people or entities who purchased or otherwise acquired Symantec common stock during the Class Period may be Class Members.

2. **Statement of the Class’s Recovery:** Subject to Court approval, Lead Plaintiff, on behalf of itself and the Class, has agreed to settle the Action in exchange for \$70,000,000 in cash (the “Settlement Amount”) to be deposited into an escrow account. The Net Settlement Fund (*i.e.*, the Settlement Amount plus any and all interest earned thereon (the “Settlement Fund”) less (i) any Taxes; (ii) any Notice and Administration Costs; (iii) any Litigation Expenses awarded by the Court; (iv) any attorneys’ fees awarded by the Court; and (v) any other costs or fees approved by the Court) will be distributed in accordance with a plan of allocation that is approved by the Court. The proposed plan of allocation (the “Plan of Allocation”) is set forth at pages 11 to 15 of this Notice. The Plan of Allocation will determine how the Net Settlement Fund shall be allocated among members of the Class.

3. **Estimate of Average Amount of Recovery Per Share:** Based on Lead Plaintiff’s damages expert’s estimate of the number of shares of Symantec common stock purchased during the Class Period that may have been affected by the conduct at issue in the Action, and assuming that all Class Members elect to participate in the Settlement, the estimated average recovery (before the deduction of any Court-approved fees, expenses, and costs as described herein) is \$0.20 per affected share. Class Members should note, however, that the foregoing average recovery is only an estimate. Some Class Members may recover more or less than the estimated amount depending on, among other factors, when and at what prices they purchased or sold their shares, and the total number and value of valid Claim Forms submitted. Distributions to Class Members will be made based on the Plan of Allocation set forth at pages 11 to 15 or such other plan of allocation as may be ordered by the Court.

4. **Average Amount of Damages Per Share:** The Parties do not agree on the average amount of damages per share of Symantec common stock that would be recoverable if Lead Plaintiff were to prevail in the Action. Among other things, Defendants vigorously deny the assertion that they violated the federal securities laws or that any damages were suffered by any members of the Class as a result of their alleged conduct.

5. **Attorneys’ Fees and Expenses Sought:** Lead Counsel, which has been prosecuting the Action on a wholly contingent basis, has not received any payment of attorneys’ fees for their representation of the Class and have advanced the funds to pay expenses necessarily incurred to prosecute the Action. Lead Counsel will apply to the Court for an award of attorneys’ fees in an amount not to exceed 19% of the Settlement Fund, or \$13.3 million, plus interest. In addition, Lead Counsel will apply for payment of Litigation Expenses in connection with the institution, prosecution, and resolution of the Action in an amount not to exceed \$2.5 million. The total Notice and Administration Costs are estimated to be \$415,000. Any fees and expenses awarded by the Court will be paid from the Settlement Fund. Class Members are not personally liable for any such fees or expenses. The estimated average cost for such fees and expenses, if the Court approves Lead Counsel’s fee and expense application, and including the Notice and Administration Costs, is \$0.05 per affected share. If the Court approves Lead Counsel’s fee and expense application, and based on the current estimate of Notice and Administration Costs, the portion of the Settlement Fund that will be distributed to Class Members will be approximately \$53,785,000, plus interest accrued.

6. **Identification of Attorneys’ Representatives:** Lead Plaintiff and the Class are represented by Jeremy P. Robinson of Bernstein Litowitz Berger & Grossmann LLP, 1251 Avenue of the Americas, 44th Floor, New York, NY 10020, 1-800-380-8496, settlements@blbglaw.com.

7. **Reasons for the Settlement:** Lead Plaintiff’s principal reason for entering into the Settlement is the substantial and certain recovery for the Class without the risk or the delays inherent in further litigation. The substantial recovery provided under the Settlement must be considered against the significant risk that a smaller recovery—or indeed no recovery at all—might be achieved after a contested summary judgment motion, a trial of the Action, and the likely

appeals that would follow a trial. This process could be expected to last several years. Defendants, who deny all allegations of wrongdoing, are entering into the Settlement solely to eliminate the uncertainty, burden, and expense of further protracted litigation.

YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENT:	
SUBMIT A CLAIM FORM POSTMARKED NO LATER THAN 28 DAYS AFTER APPROVAL OF THE SETTLEMENT. THE DEADLINE MAY BE AS EARLY AS MARCH 10, 2022. See ¶ 44 below for details.	This is the only way to be eligible to receive a payment from the Settlement Fund. If you are a Class Member, you will be bound by the Settlement as approved by the Court and you will give up any Released Plaintiff's Claims (defined in ¶ 38 below) that you have against Defendants and the other Defendants' Releasees (defined in ¶ 39 below), so it is in your interest to submit a Claim Form.
EXCLUDE YOURSELF FROM THE CLASS BY SUBMITTING A WRITTEN REQUEST FOR EXCLUSION SO THAT IT IS <i>RECEIVED</i> NO LATER THAN JANUARY 13, 2022 AT MIDNIGHT PACIFIC TIME	If you exclude yourself from the Class, you will not be eligible to receive any payment from the Settlement Fund or object to the Settlement. This is the only option that may allow you to ever be part of any other lawsuit against Defendants or the Defendants' Releasees concerning the Released Plaintiffs' Claims.
OBJECT TO THE SETTLEMENT BY SUBMITTING A WRITTEN OBJECTION SO THAT IT IS <i>RECEIVED</i> NO LATER THAN JANUARY 13, 2022 AT MIDNIGHT PACIFIC TIME.	If you do not like the proposed Settlement, the proposed Plan of Allocation, or the request for attorneys' fees and Litigation Expenses, you may write to the Court and explain why you do not like them. You cannot object to the Settlement, the Plan of Allocation, or the fee and expense request unless you are a Class Member and do not request exclusion. If you object, you will still be bound by the orders of the Court, even if your objection is overruled. If you object, you may still submit a Claim Form and will be eligible for a payment from the Settlement, if the Settlement is approved.
GO TO A HEARING ON FEBRUARY 10, 2022 AT 11:00 A.M. PACIFIC TIME, AND FILE A NOTICE OF INTENTION TO APPEAR SO THAT IT IS <i>RECEIVED</i> NO LATER THAN JANUARY 13, 2022.	Filing a written objection and notice of intention to appear by January 13, 2022 at midnight allows you to speak in Court, at the discretion of the Court, about the fairness of the proposed Settlement, the Plan of Allocation, and/or the request for attorneys' fees and Litigation Expenses. In the Court's discretion, the February 10, 2022 hearing may be conducted by telephone or video conference (<i>see</i> ¶ 85 below). If you submit a written objection, you may (but you do not have to) participate in the hearing and, at the discretion of the Court, speak to the Court about your objection.
DO NOTHING.	If you are a member of the Class and you do not submit a valid Claim Form, you will not be eligible to receive any payment from the Settlement Fund. You will, however, remain a member of the Class, which means that you give up your right to sue about the claims that are resolved by the Settlement and you will be bound by any judgments or orders entered by the Court in the Action.

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WHY DID I GET THIS NOTICE?

8. The Court directed that this Notice be mailed to you because you or someone in your family or an investment account for which you serve as a custodian may have purchased or otherwise acquired Symantec common stock during the Class Period. The Court has directed us to send you this Notice because, as a potential Class Member, you have a right to know about your options before the Court rules on the proposed Settlement. If the Court approves the Settlement and the Plan of Allocation (or some other plan of allocation), the Claims Administrator selected by Lead Plaintiff and approved by the Court will make payments pursuant to the Settlement after any objections and appeals are resolved.

9. The purpose of this Notice is to inform you of the terms of the proposed Settlement of the Action and of a hearing to be held by the Court to consider the fairness, reasonableness, and adequacy of the Settlement, the proposed Plan of Allocation, and the motion by Lead Counsel for an award of attorneys' fees and payment of Litigation Expenses (the "Settlement Hearing"). See ¶¶ 85-86 below for details about the Settlement Hearing, including the date and location of the hearing.

10. The issuance of this Notice is not an expression of any opinion by the Court concerning the merits of any claim in the Action, and the Court still must decide whether to approve the Settlement. If the Court approves the Settlement and a plan of allocation, then payments to Authorized Claimants will be made after any appeals are resolved and after the completion of all claims processing. Please be patient, as this process can take some time to complete.

WHAT IS THIS CASE ABOUT?

11. Symantec (now known as NortonLifeLock Inc.) is a technology company that provides cybersecurity products and services, including its flagship Norton Antivirus software. During the Class Period, Symantec's common stock traded on the NASDAQ under the symbol SYMC.

12. Beginning on May 17, 2018, several related securities class actions brought on behalf of investors in Symantec common stock were filed in the Court. On August 23, 2018, the Court entered an Order appointing SEB as "Lead Plaintiff" pursuant to the Private Securities Litigation Reform Act of 1995, consolidating all related actions, and inviting applications for Lead Counsel. On October 4, 2018, the Court entered an Order approving Lead Plaintiff's selection of Bernstein Litowitz Berger & Grossmann LLP ("BLB&G") as Lead Counsel.

13. On November 15, 2018, Lead Plaintiff filed a Consolidated Class Action Complaint for Violations of the Federal Securities Laws against Symantec, Gregory S. Clark, Nicholas R. Noviello, and Mark S. Garfield. Defendants filed motions to dismiss, which were fully briefed and argued by January 31, 2019. On June 14, 2019, the Court dismissed SEB's initial complaint with leave to file a motion to amend.

14. On July 11, 2019, SEB filed a motion for leave to amend and, on July 23, 2019, after the Court unsealed documents in a derivative case involving Symantec, SEB filed an amended motion for leave to amend. The amended motion for leave to amend was argued on September 26, 2019.

15. On October 2, 2019, the Court granted SEB's motion, sustaining claims under Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act") against Symantec and Clark and Section 20(a) control person and Section 20A insider trading claims under the Exchange Act against Clark. The Court dismissed as defendants Symantec's former Chief Financial Officer and former Chief Accounting Officer, as well as other allegations.

16. On October 11, 2019, Lead Plaintiff filed the operative complaint in the Action, the First Amended Consolidated Class Action Complaint for Violations of Federal Securities Laws (the "Complaint"). The Complaint asserts claims against Defendants Symantec and Clark under Section 10(b) and Rule 10b-5 promulgated thereunder, and against Defendant Clark under Sections 20(a) and 20A of the Exchange Act. Among other things, the Complaint alleges that, during the period from May 11, 2017, to August 2, 2018, inclusive (the "Class Period"), Defendants Symantec and Clark made materially false and misleading statements concerning the Company's financial results, and Defendant Clark engaged in improper insider trading by selling shares of Symantec common stock while in possession of material, non-public information. The Complaint further alleges that Defendants' alleged misstatements caused the price of Symantec common stock to be inflated during the Class Period and to decline when the alleged truth emerged through corrective disclosures on May 10, 2018 and August 2, 2018, resulting in financial losses to those who purchased the stock at the inflated price.

17. On November 7, 2019, Defendants filed their Answers to the Complaint.

18. On January 17, 2020, Lead Plaintiff filed a motion for class certification. Between then and March 5, 2020, the parties produced documents, deposed each other's experts and filed their opposition and reply briefs. Following full briefing on the motion, on May 8, 2020, the Court issued an Order certifying the Class, appointing SEB as Lead Plaintiff for the certified Class, and appointing BLB&G as Class Counsel for the certified Class.

19. On May 29, 2020, the Court approved the parties' stipulation and proposed order regarding dissemination of notice to potential Class Members (the "Class Notice") to notify them of, among other things: (i) the Action pending against Defendants; (ii) the Court's certification of the Action to proceed as a class action on behalf of the Class; and (iii) their right to request to be excluded from the Class, the effect of remaining in the Class or requesting exclusion, and the requirements for requesting exclusion. The deadline for requesting exclusion from the Class pursuant to the Class Notice was August 25, 2020. A list of the persons and entities who requested exclusion pursuant to the Original Class Notice is available at www.SymantecSecuritiesLitigation.com.

20. Discovery in the Action commenced in November 2019. Pursuant to detailed document requests and substantial negotiations, Defendants and third parties produced more than 360,000 documents, totaling more than 2.1 million pages, to Lead Plaintiff. Lead Plaintiff produced over 4,180 pages of documents to Defendants. Between September 2020 and January 2021, Lead Plaintiff deposed 19 fact witnesses, including Defendant Clark, two purported whistleblowers, and other former senior executives and former employees of Symantec. Due to the global pandemic, one additional fact deposition was held in early March 2021 for a total of 20 fact depositions taken by Lead Counsel. The Parties also served and responded to interrogatories and requests for admission and exchanged numerous letters, including disputes between the Parties and with nonparties, concerning discovery issues. The Parties also engaged in motion practice before the Court to resolve a discovery dispute concerning Defendants' production of Symantec's production to the SEC. Lead Plaintiff served subpoenas on and negotiated document discovery with ten third parties, including Symantec's outside auditor, KPMG. The Parties concluded fact discovery on January 29, 2021 (except for the additional deposition in March 2021).

21. Expert discovery commenced on January 29, 2021. Over the course of expert discovery, Lead Plaintiff served opening and reply expert reports from three experts in the fields of accounting, executive compensation, and damages. Likewise, Defendants served rebuttal expert reports from three experts in the fields of accounting, executive compensation, and damages. The Parties deposed all six experts who had submitted reports in this case and expert discovery closed on March 5, 2021.

22. On March 4, 2021, Defendants filed their motion for summary judgment. Lead Plaintiff filed its opposition to summary judgment on March 18, 2021 and Defendants filed their reply on March 25, 2021. All told, the Parties' papers on summary judgment included 130 pages of briefing and thousands of pages of exhibits.

23. In an Order dated April 20, 2021, the Court, among other things, ordered a second notice to be disseminated to the certified Class. By Order dated April 24, 2021, the Court approved the dissemination of a supplemental notice to potential Class Members (the “Supplemental Class Notice”) to notify them of, among other things, their right to request to be excluded from the Class, the effect of remaining in the Class or requesting exclusion, and the requirements for requesting exclusion. The deadline for requesting exclusion from the Class pursuant to the Supplemental Class Notice was July 2, 2021. A list of the persons and entities who requested exclusion pursuant to the Supplemental Class Notice is available at www.SymantecSecuritiesLitigation.com.

24. The Parties scheduled a settlement conference with Magistrate Judge Donna M. Ryu for September 14, 2020. In advance of the settlement conference, the Parties exchanged detailed settlement conference briefs regarding the merits of the case, including citations to evidence, and separately made private submissions to Judge Ryu regarding the strengths and weaknesses of the case. On September 14, 2020, the Parties and Symantec’s insurance carriers attended the settlement conference session, via Zoom, with Judge Ryu, but did not reach an agreement to settle the Action. The Parties continued their discussions for several weeks after that initial session but were unable to reach an agreement to settle at that time.

25. After the end of fact and expert discovery and following full briefing on Defendants’ motion for summary judgment, the Parties scheduled a second settlement conference with Judge Ryu on May 24, 2021, also via Zoom. In advance of this second settlement conference, the Parties again made private submissions to Judge Ryu regarding the strengths and weaknesses of the case. During the May 24, 2021 settlement conference supervised by Judge Ryu, which Symantec’s insurance carriers attended, the Parties reached an agreement in principle to settle the Action that was memorialized in a term sheet (the “Term Sheet”) executed on May 26, 2021. The Term Sheet sets forth, among other things, the Parties’ agreement to settle and release all claims against Defendants in return for a cash payment, to be paid by or on behalf of Defendants, of \$70,000,000 for the benefit of the Class.

26. On June 8, 2021, the Parties entered into the Stipulation, which sets forth the terms and conditions of the Settlement. The Stipulation is available at www.SymantecSecuritiesLitigation.com. Lead Plaintiff and Symantec also entered into a confidential Supplemental Agreement, which gives Symantec the right to terminate the Settlement if valid requests for exclusion are received from persons and entities entitled to be members of the Class in an amount that exceeds an amount agreed to by Lead Plaintiff and Symantec.

27. On July 6, 2021, Lead Plaintiff moved for preliminary approval of the Settlement, and on September 16, 2021, the Court preliminarily approved the Settlement, authorized this Notice to be disseminated to Class Members, and scheduled the Settlement Fairness Hearing to consider whether to grant final approval to the Settlement.

**HOW DO I KNOW IF I AM AFFECTED BY THE SETTLEMENT?
WHO IS INCLUDED IN THE CLASS?**

28. If you are a member of the Class, you are subject to the Settlement unless you timely request to be excluded from the Class. The Class means the class certified in the Court’s Order on Motion for Class Certification dated May 8, 2020 (Dkt. No. 227). The Class consists of:

all persons and entities who purchased or otherwise acquired publicly-traded Symantec common stock during the period from May 11, 2017, to August 2, 2018, inclusive (the “Class Period”), and who were damaged thereby.

The Class includes all persons or entities who purchased or otherwise acquired Symantec common stock contemporaneously with sales of Symantec common stock made or caused by Defendant Clark during the Class Period. The Class includes only persons and entities who purchased or otherwise acquired Symantec common stock during the Class Period. The Class does not include persons and entities who only had sales of Symantec common stock during the Class Period or purchasers or sellers of other Symantec securities, if any.

Excluded from the Class by definition are Defendants; members of the Immediate Family of Defendant Clark; any person who was an officer or director of Symantec; any firm or entity in which any Defendant has or had a controlling interest; any person who participated in the wrongdoing alleged; Defendants’ liability insurance carriers; any affiliates, parents, or subsidiaries of Symantec; all Symantec plans that are covered by ERISA; and the legal representatives, heirs,

beneficiaries, successors-in interest, or assigns of any excluded person or entity, in their respective capacity as such. Also excluded from the Class are (i) all persons and entities who excluded themselves by previously submitting a request for exclusion from the Class in response to either of the Class Notices, (ii) all persons and entities who exclude themselves from the Class by submitting a request for exclusion in response to this Settlement Notice that is accepted by the Court, and (iii) the legal representatives, heirs, beneficiaries, successors-in interest, or assigns of such excluded persons or entities, in their respective capacity as such. See “What If I Do Not Want To Be A Member Of The Class? How Do I Exclude Myself,” on page 16 below. If you previously requested exclusion from the Class, you do not need to do so again. A list of all persons or entities who previously submitted a request for exclusion from the Class is available at www.SymantecSecuritiesLitigation.com.

PLEASE NOTE: Receipt of this Notice does not mean that you are a Class Member or that you will be entitled to a payment from the Settlement.

If you are a Class Member and you wish to be eligible to receive a payment from the Settlement, you are required to submit the Claim Form that is being distributed with this Notice, and the required supporting documentation as set forth therein, postmarked no later than 28 days after approval of the Settlement. The Settlement website, www.SymantecSecuritiesLitigation.com, will be updated to inform Class Members of the approval of the Settlement, if and when that occurs, and the final claim filing deadline. **The deadline may be as early as March 10, 2022.**

WHAT ARE LEAD PLAINTIFF’S REASONS FOR THE SETTLEMENT?

29. Lead Plaintiff and Lead Counsel believe that the claims asserted against Defendants have merit. They recognize, however, the expense and length of continued proceedings necessary to pursue their claims against Defendants through the Court’s ruling on summary judgment, pre-trial motions, a trial, and appeals, as well as the very substantial risks they would face in establishing liability and damages. For example, Defendants argued in their summary judgment papers that the original complaint was dismissed in its entirety by the Court and the amended complaint “narrowly survived the pleading stage.” In particular, the risks of the litigation concerned each main element of Lead Plaintiff’s claims. To start, Lead Plaintiff faced challenges in proving that Defendants made materially false and misleading statements during the Class Period. For example, a key aspect of the case concerned Lead Plaintiff’s allegation that Defendants had manipulated certain of Symantec’s reported financial measures by misclassifying ordinary operating expenses as “Transition and Transformation” (“T&T”) expenses in order to meet executive compensation targets. But Defendants claimed that they did not misclassify any expenses and argued that Symantec’s accounting staff responsible for classifying the T&T expenses “testified uniformly and unambiguously that th[e] classifications were proper.” Lead Plaintiff also alleged that Symantec’s improper upfront recognition of \$12 million in revenue in the fourth quarter of fiscal 2018 misled investors. Defendants argued that this was an innocent accounting issue that, regardless, was immaterial to a multi-billion dollar per year company like Symantec, where the \$12 million represented “less than 0.25% of annual revenue and less than 1% of quarterly revenue.” Further, Lead Plaintiff faced challenges in proving scienter—*i.e.*, that Defendants knowingly or recklessly deceived investors. For example, Defendants argued that scienter could only be proved through the Company’s former CEO, Gregory Clark, which was not possible because, according to Defendants, Mr. Clark was not aware of any misclassified expenses, relied on his accounting staff to handle such matters and, when issues arose, he promptly tried to fix them in good faith, including by hiring outside consultants to review T&T expenses. Defendants also argued that Symantec had robust processes and procedures to review T&T expenses, including Board-level review. Defendants also pointed to the conclusion of a full Audit Committee investigation led by outside advisors that, according to Defendants, announced no restatement of historically filed financial statements or employment actions taken against Defendants.

30. Lead Plaintiff also faced further risks relating to proof of loss causation and damages. For example, Defendants contended in their summary judgment motion and would have argued at trial that Lead Plaintiff could not establish a causal connection between the alleged misrepresentations and the losses investors allegedly suffered, as required by law. Indeed, Defendants vehemently argued that damages were zero because the alleged corrective disclosures on May 10 and August 2, 2018 merely discussed the existence of an investigation, without any admission of wrongdoing or correction of the past alleged misstatements. Defendants also challenged the August 2018 disclosure in particular as revealing no “new” information about the alleged fraud. If Defendants had succeeded on one or more of their loss causation and

damages arguments, even if Lead Plaintiff had established liability for its securities fraud claims, the recoverable damages would have been substantially less than the amount provided in the Settlement or even zero.

31. In light of these risks, the amount of the Settlement, and the immediacy of recovery to the Class, Lead Plaintiff and Lead Counsel believe that the proposed Settlement is fair, reasonable, and adequate, and in the best interests of the Class. Lead Plaintiff and Lead Counsel believe that the Settlement provides a substantial benefit to the Class, namely \$70,000,000 in cash (less the various deductions described in this Notice), as compared to the risk that the claims in the Action would produce a smaller recovery, or no recovery, after summary judgment, trial, and appeals, possibly years in the future.

32. Defendants have vigorously denied and continue to deny each and all of the claims asserted against them in the Action and deny that the Class was harmed or suffered any damages as a result of the conduct alleged in the Action. Defendants expressly have denied and continue to deny all charges of wrongdoing or liability against them arising out of any of the conduct, statements, acts, or omissions alleged, or that could have been alleged, in the Action. Defendants have agreed to the Settlement solely to eliminate the burden and expense of continued litigation. Accordingly, the Settlement may not be construed as an admission of any wrongdoing by Defendants.

WHAT MIGHT HAPPEN IF THERE WERE NO SETTLEMENT?

33. If there were no Settlement and Lead Plaintiff failed to establish any essential legal or factual element of their claims against Defendants, neither Lead Plaintiff nor the other members of the Class would recover anything from Defendants. Also, if Defendants were successful in proving any of their defenses, either at summary judgment, at trial, or on appeal, the Class could recover substantially less than the amount provided in the Settlement, or nothing at all.

HOW ARE CLASS MEMBERS AFFECTED BY THE ACTION AND THE SETTLEMENT?

34. As a Class Member, you are represented by Lead Plaintiff and Lead Counsel, unless you enter an appearance through counsel of your own choice at your own expense. You are not required to retain your own counsel, but if you choose to do so, such counsel must file a notice of appearance on your behalf as provided in the section entitled, “When And Where Will The Court Decide Whether To Approve The Settlement?,” below.

35. If you are a Class Member and do not wish to remain a Class Member, you must exclude yourself from the Class by following the instructions in the section entitled, “What If I Do Not Want To Be A Member Of The Class? How Do I Exclude Myself?,” below. If you exclude yourself, you will not be able to receive a payment from the Settlement and you will not be able to object to the Settlement.

36. If you are a Class Member and you wish to object to the Settlement, the Plan of Allocation, or Lead Counsel’s application for attorneys’ fees and Litigation Expenses, and if you do not exclude yourself from the Class, you may present your objections by following the instructions in the section entitled, “When And Where Will The Court Decide Whether To Approve The Settlement?,” below.

37. If you are a Class Member and you do not exclude yourself from the Class, you will be bound by any orders issued by the Court. Even if you object and your objection is overruled by the Court, you will still be bound by any orders issued by the Court. If the Settlement is approved, the Court will enter a judgment (the “Judgment”). The Judgment will dismiss with prejudice the claims in the Action against Defendants and will provide that, upon the Effective Date of the Settlement, Lead Plaintiff and each of the other Class Members, on behalf of themselves, and their respective current and former heirs, executors, administrators, predecessors, successors, officers, directors, agents, parents, affiliates, subsidiaries, employees, attorneys, assignees, and assigns, in their capacities as such, will have fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged any and all of the Released Plaintiff’s Claims (as defined in ¶ 38 below) against Defendants and the other Defendants’ Releasees (as defined in ¶ 39 below), whether or not such Class Member executes and delivers a Claim or objects to the Settlement, and will forever be barred and enjoined from prosecuting, commencing, instituting, or continuing to prosecute any action or other proceeding in any court of law or equity, arbitration tribunal, or administrative forum, asserting any or all of the Released Plaintiff’s Claims against any of the Defendants’ Releasees. This Release shall not apply to any of the Excluded Plaintiff’s Claims.

38. “Released Plaintiff’s Claims” means all claims and causes of action, whether known claims or Unknown Claims, whether arising under federal, state, common or foreign law, that (i) Lead Plaintiff or any other Class Member asserted in the Complaint or Action under Sections 10(b), 20(a), and 20A of the Exchange Act and Rule 10b-5 or (ii) arise out of or relate to the transactions or occurrences asserted in the Complaint or Action *and* concern claims or causes of action of or by Lead Plaintiff or any other Class Member who purchased or otherwise acquired Symantec common stock during the Class Period, and were allegedly damaged thereby. Released Plaintiff’s Claims do not include any of the following claims: (i) claims relating to the enforcement of the Settlement; (ii) claims asserted in any pending ERISA action or derivative action, including, without limitation, claims asserted in *Lee v. Clark*, Case No. 3:19-cv-02522 (N.D. Cal.), *Milliken v. Clark*, 1:18-cv-01848 (D. Del.), *In re Symantec Corporation Stockholder Derivative Litigation*, C.A. No. 2019-0224-JTL (Del. Ch.), and *Kukard v. Symantec Corporation*, C.A. No. N18C-07-117 MMJ CCLD (Del. Super. Ct.), and any related or consolidated cases; (iii) claims by any governmental entity that arise out of any governmental investigation of Defendants relating to the alleged wrongful conduct in the Action; or (iv) claims of the persons or entities who previously submitted a request for exclusion from the Class or who submit a request for exclusion from the Class in response to this Settlement Notice that is accepted by the Court (“Excluded Plaintiff’s Claims”).

39. “Defendants’ Releasees” means Defendants and their current and former parents, affiliates, subsidiaries, related entities, officers, directors, agents, successors, predecessors, assigns, assignees, partnerships, partners, principals, trustees, trusts, employees, Immediate Family members, insurers, reinsurers, advisors, estates, heirs, executors, administrators, shareholders, joint venturers, members, managers, supervisors, contractors, consultants, representatives, attorneys, and legal or personal representatives of the foregoing, in their capacities as such.

40. “Unknown Claims” means any Released Plaintiff’s Claims which Lead Plaintiff or any other Class Member does not know or suspect to exist in his, her, or its favor at the time of the release of such claims, and any Released Defendants’ Claims which any Defendant does not know or suspect to exist in his, her, or its favor at the time of the release of such claims, which, if known by him, her, or it, might have affected his, her, or its decision(s) with respect to this Settlement. For the avoidance of doubt, Unknown Claims are limited to those that Lead Plaintiff or any other Class Member or Defendants (i) asserted in the Complaint or Action or (ii) arise out of or relate to the transactions or occurrences asserted in the Complaint or Action *and* concern claims or causes of action of or by Lead Plaintiff or any other Class Member who purchased or otherwise acquired Symantec common stock during the Class Period and were allegedly damaged thereby. Lead Plaintiff and any other Class Member, and Defendants may hereafter discover facts in addition to or different from those that he, she, or it now knows or believes to be true with respect to the subject matter of Released Plaintiff’s Claims and Released Defendants’ Claims, but they stipulate and agree that, upon the Effective Date of the Settlement, they shall expressly waive and by operation of the Judgment shall have, fully, finally, and forever settled and released any and all Unknown Claims. The Parties acknowledge, and each of the Class Members shall be deemed by operation of law to have acknowledged, that the foregoing waiver was separately bargained for and a key element of the Settlement.

41. The Judgment will also provide that, upon the Effective Date of the Settlement, Defendants, on behalf of themselves and their respective current and former heirs, executors, administrators, predecessors, successors, officers, directors, agents, parents, affiliates, subsidiaries, employees, attorneys, assignees, and assigns, in their capacities as such, will have fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged any and all Released Defendants’ Claims (as defined in ¶ 42 below) against Lead Plaintiff and the other Plaintiff’s Releasees (as defined in ¶ 43 below), and will forever be barred and enjoined from prosecuting, commencing, instituting, or continuing to prosecute any action or other proceeding in any court of law or equity, arbitration tribunal, or administrative forum, asserting any or all of the Released Defendants’ Claims against any of the Plaintiff’s Releasees. This Release shall not apply to any of the Excluded Defendants’ Claims.

42. “Released Defendants’ Claims” means all claims and causes of action of every nature and description, whether known claims or Unknown Claims, whether arising under federal, state, common or foreign law, that arise out of or relate in any way to the institution, prosecution, or settlement of the claims asserted in the Action against Defendants. Released Defendants’ Claims do not include any of the following claims: (i) claims relating to the enforcement of the Settlement; or (ii) claims against the persons or entities who previously submitted a request for exclusion from the Class or who submit a request for exclusion from the Class in response to this Settlement Notice that is accepted by the Court (“Excluded Defendants’ Claims”).

43. “Plaintiff’s Releasees” means Lead Plaintiff, all other plaintiffs in the Action, and all other Class Members, and their respective current and former parents, affiliates, subsidiaries, officers, directors, agents, successors, predecessors,

assigns, assignees, partnerships, partners, trustees, trusts, employees, Immediate Family members, insurers, reinsurers, advisors, estates, heirs, executors, administrators, shareholders, joint venturers, members, managers, supervisors, contractors, consultants, representatives, attorneys, and legal or personal representatives of the foregoing, in their capacities as such.

HOW DO I PARTICIPATE IN THE SETTLEMENT? WHAT DO I NEED TO DO?

44. To be eligible for a payment from the Settlement, you must be a member of the Class and you must timely complete and return the Claim Form with adequate supporting documentation ***postmarked (if mailed), or submitted online at www.SymantecSecuritiesLitigation.com, no later than 28 days after the Court approves the Settlement. This deadline may be as early as March 10, 2022.*** The Settlement website, www.SymantecSecuritiesLitigation.com, will be updated to inform Class Members of the approval of the Settlement, if and when that occurs, and the final claim filing deadline. You do not need to wait until after the Court approves the Settlement, but may submit your Claim Form now or at any time before the deadline.

45. A Claim Form is included with this Notice, or you may obtain one from the website maintained by the Claims Administrator for the Settlement, www.SymantecSecuritiesLitigation.com. You may also request that a Claim Form be mailed to you by calling the Claims Administrator toll free at 1-800-949-0206 or by emailing the Claims Administrator at info@SymantecSecuritiesLitigation.com. **Please retain all records of your ownership of and transactions in Symantec common stock, as they will be needed to document your Claim.** The Parties and Claims Administrator do not have information about your transactions in Symantec common stock. If you do not submit a timely and valid Claim Form, you will not be eligible to share in the Net Settlement Fund.

HOW MUCH WILL MY PAYMENT BE?

46. At this time, it is not possible to make any determination as to how much any individual Class Member may receive from the Settlement.

47. Pursuant to the Settlement, Symantec has agreed to pay or cause to be paid a total of \$70,000,000 in cash (the “Settlement Amount”). The Settlement Amount will be deposited into an escrow account. The Settlement Amount plus any interest earned thereon is referred to as the “Settlement Fund.” If the Settlement is approved by the Court and the Effective Date occurs, the Net Settlement Fund will be distributed to Class Members who submit valid Claim Forms, in accordance with the proposed Plan of Allocation or such other plan of allocation as the Court may approve.

48. The Net Settlement Fund will not be distributed unless and until the Court has approved the Settlement and a plan of allocation, and the time for any petition for rehearing, appeal, or review, whether by certiorari or otherwise, has expired.

49. Neither Defendants nor any other person or entity that paid any portion of the Settlement Amount on their behalf are entitled to get back any portion of the Settlement Fund once the Court’s order or judgment approving the Settlement becomes Final. Defendants shall not have any liability, obligation, or responsibility for the administration of the Settlement, the disbursement of the Net Settlement Fund, any actions of the Escrow Agent, or the Plan of Allocation.

50. Approval of the Settlement is independent from approval of a plan of allocation. Any determination with respect to a plan of allocation will not affect the Settlement, if approved.

51. Unless the Court otherwise orders, any Class Member who or which fails to submit a Claim Form by the deadline shall be fully and forever barred from receiving payments pursuant to the Settlement but will in all other respects remain a member of the Class and be subject to the provisions of the Stipulation, including the terms of any Judgment entered and the releases given. This means that each Class Member releases the Released Plaintiff’s Claims (as defined in ¶ 38 above) against the Defendants’ Releasees (as defined in ¶ 39 above) and will be barred and enjoined from prosecuting any of the Released Plaintiff’s Claims against any of the Defendants’ Releasees whether or not such Class Member submits a Claim Form.

52. Participants in, and beneficiaries of, any Symantec employee benefit plan covered by ERISA (“ERISA Plan”) should NOT include any information relating to their transactions in Symantec common stock held through the ERISA Plan in any Claim Form that they submit in this Action.

53. The Court has reserved jurisdiction to allow, disallow, or adjust on equitable grounds the Claim of any Class Member. Each Claimant shall be deemed to have submitted to the jurisdiction of the Court with respect to his, her, or its Claim Form.

54. Only members of the Class will be eligible to share in the distribution of the Net Settlement Fund. Persons and entities that are excluded from the Class by definition or that previously excluded themselves from the Class pursuant to request or who now exclude themselves from the Class by request will not be eligible for a payment and should not submit Claim Forms. The only security that is included in the Settlement is Symantec common stock.

PROPOSED PLAN OF ALLOCATION

55. The guiding principle of recovery in the Plan of Allocation is that people or entities who purchased or otherwise acquired Symantec common stock during the Class Period are eligible to share in the Net Settlement Fund. But sales of Symantec common stock during the Class Period are not eligible. The objective of the Plan of Allocation is to equitably distribute the Net Settlement Fund to those Class Members who suffered economic losses as a proximate result of the alleged violations of the federal securities laws. The calculations made pursuant to the Plan of Allocation are not intended to be estimates of the amounts that Class Members might have been able to recover after a trial. Nor are the calculations pursuant to the Plan of Allocation intended to be estimates of the amounts that will be paid to Authorized Claimants pursuant to the Settlement. The computations under the Plan of Allocation are only a method to weigh the claims of Claimants against one another for the purposes of making *pro rata* allocations of the Net Settlement Fund.

56. In developing the Plan of Allocation in conjunction with Lead Counsel, Lead Plaintiff’s damages expert calculated the estimated amount of artificial inflation in the price of Symantec common stock allegedly caused by Defendants’ alleged false and misleading statements and material omissions. In calculating the estimated artificial inflation allegedly caused by Defendants’ alleged misrepresentations and omissions, Lead Plaintiff’s damages expert considered price changes in the stock in reaction to the public disclosures allegedly revealing the truth concerning Defendants’ alleged misrepresentations and material omissions, adjusting for price changes that were attributable to market or industry forces.

57. Recognized Loss Amounts for transactions in Symantec common stock are calculated under the Plan of Allocation based primarily on (1) the difference in the amount of alleged artificial inflation in the price of Symantec common stock at the time of purchase and the time of sale or (2) the difference between the actual purchase price and sale price, whichever is less. In addition, shares that are purchased in the Class Period and sold during the 90-day period after the Class Period or held to the end of that period are subject to a further limitation based on the average price of Symantec common stock during that period, as required by a federal statute. In order to have a Recognized Loss Amount under the Plan of Allocation, a Class Member who purchased or otherwise acquired Symantec common stock prior to the first corrective disclosure, which occurred after the close of the financial markets on May 10, 2018, must have held his, her, or its shares of Symantec common stock through at least the close of trading on May 10, 2018. A Class Member who purchased or otherwise acquired publicly traded Symantec common stock from May 11, 2018 through and including August 2, 2018, must have held those shares through at least the close of trading on August 2, 2018, when additional corrective information was released to the market and removed the remaining artificial inflation from the price of Symantec common stock on August 3, 2018.

CALCULATION OF RECOGNIZED LOSS AMOUNTS

58. Based on the formula stated below, a “Recognized Loss Amount” will be calculated for each purchase of Symantec common stock during the Class Period that is listed on the Claim Form and for which adequate documentation is provided. If a Recognized Loss Amount calculates to a negative number or zero under the formula below, the Recognized Loss Amount for that transaction will be zero.

59. Only purchases or other acquisitions of Symantec common stock during the Class Period (from May 11, 2017 through August 2, 2018, inclusive) are eligible for compensation in the Settlement. Sales of stock are not eligible for compensation. Only purchases and acquisitions are eligible for compensation because the allegations in this

case are that Class Members were injured by purchasing Symantec shares when the price of those shares were artificially inflated by Defendants' alleged misrepresentations.

60. In addition, any shares purchased during the Class Period that are sold before the next relevant corrective disclosure date (May 11, 2018 or August 2, 2018) are not eligible for compensation. The reason for this is that, for losses to be compensable damages under the federal securities laws, the disclosure of the allegedly misrepresented information must be the cause of the decline in the price of the Symantec common stock. In the Action, Lead Plaintiff alleges that Defendants made false statements and omitted material facts during the period from May 11, 2017 through August 2, 2018, inclusive, which had the effect of artificially inflating the price of Symantec common stock. Lead Plaintiff further alleges that corrective information was released to the market on: May 10, 2018 and August 2, 2018, which partially removed artificial inflation from the price of Symantec common stock on: May 11-15, 2018 and August 3, 2018.

61. For each share of publicly traded Symantec common stock purchased or otherwise acquired during the period from May 11, 2017 through August 2, 2018, inclusive, and

- a) sold before the close of trading on May 10, 2018, the Recognized Loss Amount is zero;
- b) sold from May 11, 2018 through August 2, 2018, the Recognized Loss Amount is **the lesser of:** (i) the differential in artificial inflation per share on the date of purchase/acquisition compared to the date of sale, as stated in Table A; or (ii) the purchase price *minus* the sale price;
- c) sold from August 3, 2018 through October 31, 2018, the Recognized Loss Amount is **the least of:** (i) the differential in artificial inflation per share on the date of purchase/acquisition compared to the date of sale, as stated in the last column of Table A; (ii) the purchase price *minus* the sale price; or (iii) the purchase price *minus* the average closing price per share applicable to the date of sale as stated in Table B;
- d) held at the end of trading on October 31, 2018, the Recognized Loss Amount is equal to **the lesser of:** (i) the differential in artificial inflation per share on the date of purchase/acquisition as compared to the date of holding, as stated in the last column of Table A; or (ii) the purchase price per share *minus* \$19.85.²

Example Calculations

Claimant Janet Jones purchased 2,000 shares of Symantec common stock on February 15, 2018 for \$27.00 per share and she:

- (1) sold 1,000 shares on April 4, 2018 for \$26.00 per share; and
- (2) sold 1,000 shares on May 11, 2018 for \$20.00 per share.

Ms. Jones' Recognized Loss Amounts would be calculated as follows (under ¶ 61 above):

- (1) the 1,000 shares sold on April 4, 2018 would not be eligible for any recovery (\$0 Recognized Loss Amount) because they were sold before the first alleged corrective disclosure on May 10, 2018 (*see* ¶ 61(a) above).
- (2) the Recognized Loss Amount for the shares sold on May 11, 2018 would be **the lesser of:** (i) the differential in artificial inflation per share on the date of purchase/acquisition compared to the date of sale, as stated in Table A (**or \$6.61 per share**); or (ii) the purchase price *minus* the sale price (**\$27.00-**

² Pursuant to Section 21(D)(e)(1) of the Exchange Act, "in any private action arising under this title in which the plaintiff seeks to establish damages by reference to the market price of a security, the award of damages to the plaintiff shall not exceed the difference between the purchase or sale price paid or received, as appropriate, by the plaintiff for the subject security and the mean trading price of that security during the 90-day period beginning on the date on which the information correcting the misstatement or omission that is the basis for the action is disseminated to the market." This 90-day period is known as the "90-day look-back period." The average (mean) closing price of Symantec common stock during the 90-day look-back period from August 3, 2018 through October 31, 2018, inclusive, was \$19.85.

\$20.00 or \$7.00 per share) (see ¶ 61(b) above). Thus, the Recognized Loss Amount would be \$6.61 per share or \$6,610.00 for this transaction.

Based on this example, Ms. Jones' total Recognized Claim (the sum of her Recognized Loss Amounts for all transactions) would be \$6,610.00. **Note:** this would not be the amount of Ms. Jones's payment in the Settlement. Instead, each claimant's Recognized Claim will be used for the purpose of making a *pro rata* distribution of the Net Settlement Fund based on the total value of all claimants' Recognized Claims. *For example*, depending on the total value of claims received, each eligible claimant might receive 10% of their Recognized Claim, or in the case of Ms. Jones, \$661.

TABLE A
Difference in Estimated Artificial Inflation in
Symantec Common Stock for Purchases and Sales in Class Period

Purchase Date	Sale Date				
	May 11, 2017 – May 10, 2018	May 11, 2018 – May 13, 2018	May 14, 2018	May 15, 2018 – Aug. 2, 2018	After Aug. 2, 2018 or still held
May 11, 2017 – Aug. 2, 2017	\$0.00	\$4.83	\$3.51	\$2.79	\$3.06
Aug. 3, 2017 – Nov. 1, 2017	\$0.00	\$5.63	\$4.31	\$3.59	\$3.86
Nov. 2, 2017– Jan. 31, 2018	\$0.00	\$5.72	\$4.40	\$3.68	\$3.95
Feb. 1, 2018 – May 10, 2018	\$0.00	\$6.61	\$5.29	\$4.57	\$4.84
May 11, 2018 – Aug. 2, 2018	\$0.00	\$0.00	\$0.00	\$0.00	\$0.27

TABLE B
90-Day Look-Back Table for Symantec Common Stock
(Average Closing Price: August 3, 2018 – October 31, 2018)

Date	Average Closing Price from August 3, 2018 through Date	Date	Average Closing Price from August 3, 2018 through Date	Date	Average Closing Price from August 3, 2018 through Date
8/3/2018	\$19.25	9/4/2018	\$19.56	10/3/2018	\$20.03
8/6/2018	\$19.41	9/5/2018	\$19.57	10/4/2018	\$20.03
8/7/2018	\$19.42	9/6/2018	\$19.58	10/5/2018	\$20.03
8/8/2018	\$19.43	9/7/2018	\$19.59	10/8/2018	\$20.04
8/9/2018	\$19.39	9/10/2018	\$19.60	10/9/2018	\$20.04
8/10/2018	\$19.35	9/11/2018	\$19.62	10/10/2018	\$20.04
8/13/2018	\$19.28	9/12/2018	\$19.64	10/11/2018	\$20.02
8/14/2018	\$19.20	9/13/2018	\$19.65	10/12/2018	\$20.02
8/15/2018	\$19.13	9/14/2018	\$19.66	10/15/2018	\$20.01
8/16/2018	\$19.15	9/17/2018	\$19.67	10/16/2018	\$20.02
8/17/2018	\$19.18	9/18/2018	\$19.70	10/17/2018	\$20.03
8/20/2018	\$19.20	9/19/2018	\$19.73	10/18/2018	\$20.03
8/21/2018	\$19.22	9/20/2018	\$19.76	10/19/2018	\$20.03
8/22/2018	\$19.26	9/21/2018	\$19.79	10/22/2018	\$20.02
8/23/2018	\$19.28	9/24/2018	\$19.84	10/23/2018	\$20.01
8/24/2018	\$19.31	9/25/2018	\$19.88	10/24/2018	\$19.99
8/27/2018	\$19.36	9/26/2018	\$19.91	10/25/2018	\$19.97
8/28/2018	\$19.41	9/27/2018	\$19.94	10/26/2018	\$19.95
8/29/2018	\$19.47	9/28/2018	\$19.98	10/29/2018	\$19.91
8/30/2018	\$19.50	10/1/2018	\$20.00	10/30/2018	\$19.88
8/31/2018	\$19.54	10/2/2018	\$20.01	10/31/2018	\$19.85

62. For shares of Symantec common stock that were purchased during the period from August 28, 2017 through September 14, 2017 (the “20A Period”), the Recognized Loss Amount for those purchases will be increased by 2%. Specifically, the Recognized Loss Amount calculated above in paragraph 61 for these purchases will be multiplied by 1.02. Shares purchased during the 20A Period will receive this enhancement to their Recognized Loss Amount because the investors who purchased Symantec common stock in the 20A Period purchased their shares “contemporaneously” with sales of Symantec common stock by Defendant Clark that were alleged in the Complaint (*i.e.*, within 9 trading days after sales by Clark on August 28 and 31, 2017), and, thus, these Class Members possessed claims under Section 20A of the Exchange Act which were not possessed by other members of the Class. The 2% enhancement was selected by considering (a) the amount of additional incremental (or non-overlapping) damages that might have been recovered from Defendant Clark under the Section 20A claims; (b) the estimated litigation risks of succeeding on those claims; and (c) the percentage of eligible Class purchases estimated to have occurred in the 20A Period.

ADDITIONAL PROVISIONS

63. The Net Settlement Fund will be allocated among all Authorized Claimants whose Distribution Amount (defined in paragraph 71 below) is \$10.00 or greater.

64. **Calculation of Claimant’s “Recognized Claim”:** A Claimant’s “Recognized Claim” will be the sum of his, her, or its Recognized Loss Amounts as calculated above with respect to all purchases or acquisitions of publicly traded Symantec common stock during the Class Period.

65. **FIFO Matching:** If a Settlement Class Member had sales of Symantec common stock during the relevant time periods (in addition to having made one or more purchases or acquisitions), the sales will be matched with purchases/acquisitions on a First In, First Out (“FIFO”) basis. Specifically, sales will be matched first against any holdings of Symantec common stock at the beginning of the Class Period, and then against purchases/acquisitions in chronological order, beginning with the earliest purchase/acquisition made during the Class Period.

When Lead Plaintiff SEB submitted its motion to be appointed as Lead Plaintiff it presented its losses based on both FIFO and Last In, First Out (“LIFO”) matching methods. SEB had by far the largest losses of all movants under either measure with a \$6.1 million FIFO loss and \$5.325 million LIFO loss. While SEB’s losses under FIFO slightly exceed its losses under LIFO, the total estimated maximum class damages under FIFO (\$1,015.6 million) are also greater than total estimated maximum class damages under LIFO (\$905.7 million), so that SEB’s expected recovery under the Settlement is approximately the same whether FIFO or LIFO is used.

66. **“Purchase/Sale” Prices:** For the purposes of calculations under this Plan of Allocation, “purchase price” means the actual price paid, excluding all fees, taxes, and commissions, and “sale price” means the actual amount received, not deducting any fees, taxes, and commissions.

67. **“Purchase/Sale” Dates:** Purchases, acquisitions, and sales of Symantec common stock will be deemed to have occurred on the “contract” or “trade” date as opposed to the “settlement” or “payment” date. However, the receipt or grant by gift, inheritance, or operation of law of Symantec common stock during the Class Period shall not be deemed an eligible purchase, acquisition, or sale for the calculation of a Claimant’s Recognized Loss Amount, nor shall the receipt or grant be deemed an assignment of any claim relating to the stock unless (i) the donor or decedent purchased or acquired the Symantec common stock during the Class Period; (ii) the instrument of gift or assignment specifically provides that it is intended to transfer such rights; and (iii) no Claim was submitted by or on behalf of the donor, on behalf of the decedent, or by anyone else with respect to those shares.

68. **Short Sales:** The date of covering a “short sale” is deemed to be the date of purchase of the Symantec common stock. The date of a “short sale” is deemed to be the date of sale of the Symantec common stock. In accordance with the Plan of Allocation, however, the Recognized Loss Amount on “short sales” and the purchases covering “short sales” is zero.

69. In the event that a Claimant has an opening short position in Symantec common stock, the earliest purchases or acquisitions of Symantec common stock during the Class Period will be matched against such opening short position, and not be entitled to a recovery, until that short position is fully covered.

70. **Shares Purchased/Sold Through the Exercise of Options:** Option contracts are not securities eligible to participate in the Settlement. With respect to shares of Symantec common stock purchased or sold through the exercise of an option, the purchase/sale date of the Symantec common stock is the exercise date of the option and the purchase/sale price is the exercise price of the option.

71. **Determination of Distribution Amount:** The Net Settlement Fund will be distributed to Authorized Claimants on a *pro rata* basis based on the relative size of their Recognized Claims. Specifically, a “Distribution Amount” will be calculated for each Authorized Claimant, which shall be the Authorized Claimant’s Recognized Claim divided by the total Recognized Claims of all Authorized Claimants, multiplied by the total amount in the Net Settlement Fund.

72. If an Authorized Claimant’s Distribution Amount calculates to less than \$10.00, it will not be included in the calculation and no distribution will be made to that Authorized Claimant.

73. After the initial distribution of the Net Settlement Fund, the Claims Administrator will make reasonable and diligent efforts to have Authorized Claimants cash their distribution checks. To the extent any monies remain in the Net Settlement Fund after the initial distribution, if Lead Counsel, in consultation with the Claims Administrator, determines that it is cost-effective to do so, the Claims Administrator, no less than seven (7) months after the initial distribution, will conduct a re-distribution of the funds remaining after payment of any unpaid fees and expenses incurred in administering the Settlement, including for such re-distribution, to Authorized Claimants who have cashed their initial distributions and who would receive at least \$10.00 from such re-distribution. Additional re-distributions to Authorized Claimants who have cashed their prior checks and who would receive at least \$10.00 on such additional re-distributions may occur thereafter if Lead Counsel, in consultation with the Claims Administrator, determines that additional re-distributions, after the deduction of any additional fees and expenses incurred in administering the Settlement, including for such re-distributions, would be cost-effective. At such time as it is determined that the re-distribution of funds remaining in the Net Settlement Fund is not cost-effective, the remaining balance will be contributed to the Investor Protection Trust, a non-sectarian, not-for-profit, 501(c)(3) organization devoted to investor education.

74. Payment pursuant to the Plan of Allocation, or such other plan of allocation as may be approved by the Court, will be conclusive against all Claimants. No person or entity shall have any claim against Lead Plaintiff, Lead Counsel, the Claims Administrator, or any other agent designated by Lead Counsel, or Defendants’ Releasees and/or their respective counsel, arising from distributions made substantially in accordance with the Stipulation, the plan of allocation approved by the Court, or any order of the Court. Lead Plaintiff and Defendants, and their respective counsel, and all other Releasees shall have no liability whatsoever for the investment or distribution of the Settlement Fund or the Net Settlement Fund, the plan of allocation, or the determination, administration, calculation, or payment of any claim or nonperformance of the Claims Administrator, the payment or withholding of Taxes (including interest and penalties) owed by the Settlement Fund, or any losses incurred in connection therewith.

75. The Plan of Allocation set forth herein is the plan that is being proposed to the Court for its approval by Lead Plaintiff after consultation with Lead Plaintiff’s damages expert. The Court may approve this Plan as proposed or it may modify the Plan of Allocation without further notice to the Class. Any Orders regarding any modification of the Plan of Allocation will be posted on the case website, www.SymantecSecuritiesLitigation.com.

**WHAT PAYMENT ARE THE ATTORNEYS FOR THE CLASS SEEKING?
HOW WILL THE LAWYERS BE PAID?**

76. Lead Counsel has not received any payment for its services in pursuing claims against Defendants on behalf of the Class, nor has it been paid for its litigation expenses. Before final approval of the Settlement, Lead Counsel will apply to the Court for an award of attorneys’ fees in an amount not to exceed 19% of the Settlement Fund, or \$13.3 million, plus interest. At the same time, Lead Counsel also intends to apply for payment of Litigation Expenses in an amount not to exceed \$2.5 million. Lead Counsel will file its motion for attorneys’ fees and expenses by December 30, 2021. The Court will determine the amount of any award of attorneys’ fees or Litigation Expenses. Such sums as may be approved by the Court will be paid from the Settlement Fund. Class Members are not personally liable for any such fees or expenses.

**WHAT IF I DO NOT WANT TO BE A MEMBER OF THE CLASS?
HOW DO I EXCLUDE MYSELF?**

77. Each Class Member will be bound by all determinations and judgments in this lawsuit, whether favorable or unfavorable, unless such person or entity mails or delivers a written request for exclusion addressed to: *Symantec Securities Litigation*, EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217. The request for exclusion must be **received no later than January 13, 2022 at midnight**. You will not be able to exclude yourself from the Class after that date.

78. You do not need to request exclusion from the Class again if you previously submitted a request for exclusion in response to the Original Class Notice (dated June 2020) or the Supplemental Class Notice (dated May 2021). A list of persons and entities who previously requested exclusion from the Class in response to the Class Notices is available at www.SymantecSecuritiesLitigation.com.

79. Each request for exclusion must: (i) state the name, address, and telephone number of the person or entity requesting exclusion, and in the case of entities, the name and telephone number of the appropriate contact person; (ii) state that such person or entity “requests exclusion from the Class in *SEB Investment Management AB v. Symantec Corp., et al.*, Case No. C 18-02902-WHA (N.D. Cal.)”; (iii) state whether the shares owned by the person requesting exclusion were owned in street name and, if so, by whom; and (iv) be signed by the person or entity requesting exclusion or an authorized representative.

80. A request for exclusion shall not be valid and effective unless it provides all the information called for in ¶ 79 and is received within the time stated above, or is otherwise accepted by the Court.

81. If you do not want to be part of the Class, you must follow these instructions for exclusion even if you have pending, or later file, another lawsuit, arbitration, or other proceeding relating to any Released Plaintiffs’ Claim against any of the Defendants’ Releasees. Excluding yourself from the Class is the only option that allows you to be part of any other current or future lawsuit against Defendants or any of the other Defendants’ Releasees concerning the Released Plaintiffs’ Claims. **Please note:** If you decide to exclude yourself from the Class, Defendants and the other Defendants’ Releasees will have the right to assert any and all defenses they may have to any claims that you may seek to assert.

82. If you ask to be excluded from the Class, you will not be eligible to receive any payment out of the Net Settlement Fund and you will not be able to submit an objection to the Settlement, the Plan of Allocation, or Lead Counsel’s motion for attorneys’ fees and expenses.

83. Lead Plaintiff and Symantec have entered into a confidential Supplemental Agreement, which gives Symantec the right to terminate the Settlement if valid requests for exclusion are received from persons and entities entitled to be members of the Class in an amount that exceeds an amount agreed to by Lead Plaintiff and Symantec.

**WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?
DO I HAVE TO COME TO THE HEARING?
MAY I SPEAK AT THE HEARING IF I DON’T LIKE THE SETTLEMENT?**

84. **Class Members do not need to attend the Settlement Fairness Hearing. The Court will consider any submission made in accordance with the provisions below even if a Class Member does not attend the hearing. You can participate in the Settlement without attending the Settlement Fairness Hearing.**

85. **Please Note:** The date and time of the Settlement Fairness Hearing may change without further written notice to the Class. In addition, the ongoing COVID-19 health emergency is a fluid situation that creates the possibility that the Court may decide to conduct the Settlement Hearing by video or telephonic conference, or otherwise allow Class Members to appear at the hearing by phone or video, without further written notice to the Class. **In order to determine whether the date and time of the Settlement Fairness Hearing have changed, or whether Class Members must or may participate by phone or video, it is important that you monitor the Court’s docket and the Settlement website, www.SymantecSecuritiesLitigation.com, before making any plans to attend the Settlement Fairness Hearing. Any updates regarding the hearing, including any changes to the date or time of the hearing or updates regarding in-person or telephonic appearances at the hearing, will be posted to the Settlement website,**

www.SymantecSecuritiesLitigation.com. Also, if the Court requires or allows Class Members to participate in the Settlement Fairness Hearing by telephone or video conference, the information needed to access the conference will be posted to **www.SymantecSecuritiesLitigation.com**.

86. The Settlement Hearing will be held on **February 10, 2022 at 11:00 a.m. Pacific time**, before the Honorable William Alsup either in person at the United States District Court for the Northern District of California, San Francisco Courthouse, Courtroom 12 - 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102, or by telephone or videoconference (in the discretion of the Court). At the hearing, the Court will determine, among other things, (i) whether the proposed Settlement on the terms and conditions provided for in the Stipulation is fair, reasonable, and adequate to the Class, and should be finally approved by the Court; (ii) whether the Action should be dismissed with prejudice against Defendants and the Releases specified and described in the Stipulation (and in this Notice) should be granted; (iii) whether the proposed Plan of Allocation should be approved as fair and reasonable; (iv) whether Lead Counsel's motion for attorneys' fees and Litigation Expenses should be approved; and (v) any other matters that may properly be brought before the Court in connection with the Settlement. The Court reserves the right to approve the Settlement, the Plan of Allocation, and Lead Counsel's motion for attorneys' fees and Litigation Expenses; and/or consider any other matter related to the Settlement at or after the Settlement Hearing without further notice to the members of the Class.

87. Any Class Member who or which does not request exclusion may object to the Settlement, the proposed Plan of Allocation, or Lead Counsel's motion for attorneys' fees and Litigation Expenses. Objections must be in writing. To object, you must file any written objection, together with copies of all other papers and briefs supporting the objection, with the Clerk's Office at the United States District Court for the Northern District of California at the address set forth below **on or before January 13, 2022 at midnight**.

Clerk's Office

United States District Court
Northern District of California
Class Action Clerk
Phillip Burton Federal Building &
U.S. Courthouse
450 Golden Gate Avenue
San Francisco, CA 94102

88. Any objection must (i) identify the case name and docket number, *SEB Investment Management AB v. Symantec Corp., et al.*, Case No. C 18-02902-WHA (N.D. Cal.); (ii) state the name, address, and telephone number of the person or entity objecting and must be signed by the objector; (iii) state whether the objector is represented by counsel and, if so, the name, address, and telephone number of the objector's counsel; (iv) contain a statement of the Class Member's objection or objections, and the specific reasons for each objection, including any legal and evidentiary support the Class Member wishes to bring to the Court's attention and whether the objection applies only to the objector, to a specific subset of the Class, or to the entire Class; and (v) include documents sufficient to prove membership in the Class, including documents showing the number of shares of publicly-traded Symantec common stock that the objector (A) owned as of the opening of trading on May 11, 2017 and (B) purchased/acquired and/or sold during the Class Period (*i.e.*, from May 11, 2017 through August 2, 2018, inclusive). Documentation establishing membership in the Class must consist of copies of brokerage confirmation slips or monthly brokerage account statements, or an authorized statement from the objector's broker containing the transactional and holding information found in a broker confirmation slip or account statement.

89. Lead Plaintiff and Lead Counsel will file their detailed motion papers in support of final approval of the Settlement and approval of attorneys' fees and Litigation Expenses on December 30, 2021. Those papers will be made available on **www.SymantecSecuritiesLitigation.com** if you wish to review them before submitting an objection.

90. You may not object to the Settlement, the Plan of Allocation, or Lead Counsel's motion for attorneys' fees and Litigation Expenses if you previously excluded yourself or now exclude yourself from the Class or if you are not a member of the Class.

91. If you submit an objection, you will still be bound by the Court's orders in the case even if the Court overrules your objection. You may file a Claim Form and be eligible to receive a payment in the Settlement even if you submit an objection.

92. You may file a written objection without having to appear at the Settlement Hearing. You may not, however, appear at the Settlement Hearing to present your objection unless you first file a written objection in accordance with the procedures described above, unless the Court orders otherwise.

93. If you wish to be heard orally at the hearing in opposition to the approval of the Settlement, the Plan of Allocation, or Lead Counsel's motion for attorneys' fees and Litigation Expenses, assuming you timely file a written objection as described above, you must also file a notice of appearance with the Clerk's Office at the address set forth in ¶ 87 above so that it is **received on or before January 13, 2022 at midnight**. Persons who intend to object and desire to present evidence at the Settlement Hearing must include in their written objection or notice of appearance the identity of any witnesses they may call to testify and exhibits they intend to introduce into evidence at the hearing. It is within the Court's discretion to allow appearances at the Settlement Hearing either in person or by telephone or videoconference, with or without the filing of written objections.

94. You are not required to hire an attorney to represent you in making written objections or in appearing at the Settlement Hearing. However, if you decide to hire an attorney, it will be at your own expense, and that attorney must file a notice of appearance with the Court so that the notice is **received on or before January 13, 2022 at midnight**.

95. The Settlement Hearing may be adjourned by the Court without further written notice to the Class. If you plan to attend the hearing, you should confirm the date and time with Lead Counsel.

96. **Unless the Court orders otherwise, any Class Member who does not object in the manner described above will be deemed to have waived any objection and shall be forever foreclosed from making any objection to the proposed Settlement, the proposed Plan of Allocation, or Lead Counsel's motion for attorneys' fees and Litigation Expenses. Class Members do not need to appear at the Settlement Hearing or take any other action to indicate their approval.**

WHAT IF I BOUGHT SHARES ON SOMEONE ELSE'S BEHALF?

97. **If you previously provided the names and addresses of persons and entities on whose behalf you purchased or acquired publicly-traded Symantec common stock during the period from May 11, 2017 to August 2, 2018, inclusive, in connection with the Original Class Notice (disseminated in or around June 2020) or the Supplemental Class Notice (disseminated in or around May 2021), and (i) those names and addresses remain current and (ii) you have no additional names and addresses for potential Class Members to provide to the Claims Administrator, you need do nothing further at this time. The Claims Administrator will mail a copy of this Settlement Notice and the Claim Form (the "Settlement Notice Packet") to the beneficial owners whose names and addresses were previously provided in connection with the Class Notices.**

98. If you elected to mail the Original Class Notice and Supplemental Class Notice directly to beneficial owners, you were advised that you must retain the mailing records for use in connection with any further notices that may be provided in the Action. If you elected this option, the Claims Administrator will forward the same number of Settlement Notice Packets to you to send to the beneficial owners. You must mail the Settlement Notice Packets to the beneficial owners no later than October 8, 2021.

99. If you have additional name and address information, if the name and address information of certain of your beneficial owners has changed, or if you need additional copies of the Supplemental Notice Packet, or have not already provided information regarding persons and entities on whose behalf you purchased or acquired publicly-traded Symantec common stock during the period from May 11, 2017 to August 2, 2018, inclusive, in connection with the Original Class Notice or the Supplemental Class Notice, then, the Court has ordered that you must, by October 8, 2021, either: (i) send a list of the names and addresses of such beneficial owners to the Claims Administrator at *Symantec Securities Litigation*, c/o A.B. Data, Ltd., P.O. Box 173106, Milwaukee, WI 53217, in which event the Claims Administrator shall promptly mail the Settlement Notice Packet to such beneficial owners; or (ii) request from A.B. Data sufficient copies of the Settlement Notice Packet to forward to all such beneficial owners, which you must then mail to the beneficial owners no later than seven (7) calendar days after receipt, and no later than October 22, 2021. As stated above, if you have already provided this information in connection with the Original Class Notice or Supplemental Class Notice, unless that information has changed (e.g., the beneficial owner has changed address), it is unnecessary to provide such information again.

100. Upon full and timely compliance with these directions, such nominees may seek reimbursement of their reasonable expenses actually incurred, by providing the Claims Administrator with proper documentation supporting the expenses for which reimbursement is sought. Copies of this Notice and the Claim Form may also be obtained from the Settlement website, www.SymantecSecuritiesLitigation.com, by calling the Claims Administrator toll-free at 1-800-949-0206, or by emailing the Claims Administrator at info@SymantecSecuritiesLitigation.com.

**CAN I SEE THE COURT FILE?
WHOM SHOULD I CONTACT IF I HAVE QUESTIONS?**

101. This Notice contains only a summary of the terms of the proposed Settlement. For the precise terms and conditions of the Settlement or to obtain additional information, you may find the Stipulation and other relevant documents at www.SymantecSecuritiesLitigation.com, by contacting Lead Counsel at the address below, by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

All inquiries concerning this Notice and the Claim Form should be directed to:

Symantec Securities Litigation
c/o A.B. Data, Ltd.
P.O. Box 173106
Milwaukee, WI 53217

and/or

Jeremy P. Robinson, Esq.
Bernstein Litowitz Berger
& Grossmann LLP
1251 Avenue of the Americas
New York, NY 10020

1-800-949-0206
info@SymantecSecuritiesLitigation.com
www.SymantecSecuritiesLitigation.com

1-800-380-8496
settlements@blbglaw.com

DO NOT CALL OR WRITE THE COURT, THE OFFICE OF THE CLERK OF THE COURT, DEFENDANTS, OR THEIR COUNSEL REGARDING THIS SETTLEMENT OR THE CLAIM PROCESS.

Dated: September 24, 2021

By Order of the Court
United States District Court
Northern District of California

Symantec Securities Litigation
Toll-Free Number: 1-800-949-0206
Email: info@SymantecSecuritiesLitigation.com
Website: www.SymantecSecuritiesLitigation.com

PROOF OF CLAIM AND RELEASE FORM

To be eligible to receive a share of the Net Settlement Fund in connection with the Settlement of this Action, you must complete and sign this Proof of Claim and Release Form ("Claim Form") and mail it by First-Class Mail to the address below, or submit it online at www.SymantecSecuritiesLitigation.com, with supporting documentation, ***postmarked (or received) no later than 28 days after final approval of the Settlement. This deadline may be as early as March 10, 2022.*** You do not need to wait until after the Court approves the Settlement, but may submit your Claim Form now or at any time before the deadline.

- The Settlement website, www.SymantecSecuritiesLitigation.com, will be updated to inform Class Members when the Settlement is approved, if that occurs, and the final claim filing deadline.

Mail to:

Symantec Securities Litigation
c/o A.B. Data, Ltd.
P.O. Box 173106
Milwaukee, WI 53217

Failure to submit your Claim Form by the date specified will subject your claim to rejection and may preclude you from being eligible to receive a payment from the Settlement.

Do not mail or deliver your Claim Form to the Court, Lead Counsel, Defendants' Counsel, or any of the Parties to the Action. Submit your Claim Form only to the Claims Administrator at the address set forth above.

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PART II – SCHEDULE OF TRANSACTIONS IN SYMANTEC COMMON STOCK

Please provide the requested information on your holdings and trading of Symantec common stock. During the Class Period, the Symantec common stock traded on the NASDAQ under the symbol **SYMC**, CUSIP: 871503108. On November 5, 2019, after the Class Period, Symantec became NortonLifeLock Inc. and its symbol became NLOK. Please include proper documentation with your Claim Form as described in the Instructions, ¶ 4 on page 6 below.

1. HOLDINGS AS OF MAY 11, 2017 – State the total number of shares of Symantec common stock held as of the opening of trading on May 11, 2017. (Must be documented.) If none, write “zero” or “0.”			
2. PURCHASES/ACQUISITIONS FROM MAY 11, 2017 THROUGH AUGUST 2, 2018 – Separately list each purchase or acquisition of Symantec common stock from after the opening of trading on May 11, 2017 through and including the close of trading on August 2, 2018. (Must be documented.)			
Date of Purchase/ Acquisition (List Chronologically) (Month/Day/Year)	Number of Shares Purchased/Acquired	Purchase Price Per Share	Confirm Proof of Purchase Enclosed
/ /		\$	☐
/ /		\$	☐
/ /		\$	☐
/ /		\$	☐
3. PURCHASES/ACQUISITIONS FROM AUGUST 3, 2018 THROUGH OCTOBER 31, 2018 – State the total number of shares of Symantec common stock purchased or acquired from August 3, 2018 through the close of trading on October 31, 2018. If none, write “zero” or “0.”			
4. SALES FROM MAY 11, 2017 THROUGH OCTOBER 31, 2018 – Separately list each sale or disposition of Symantec common stock from after the opening of trading on May 11, 2017 through and including the close of trading on October 31, 2018. (Must be documented.)			IF NONE, CHECK HERE ☐
Date of Sale (List Chronologically) (Month/Day/Year)	Number of Shares Sold	Sale Price Per Share	Confirm Proof of Sale Enclosed
/ /		\$	☐
/ /		\$	☐
/ /		\$	☐
/ /		\$	☐
5. HOLDINGS AS OF OCTOBER 31, 2018 – State the total number of shares of Symantec common stock held as of the close of trading on October 31, 2018. (Must be documented.) If none, write “zero” or “0.”			Confirm Proof of Position Enclosed ☐
IF YOU NEED ADDITIONAL SPACE, ATTACH EXTRA SCHEDULES IN THE SAME FORMAT. PRINT THE BENEFICIAL OWNER’S FULL NAME AND LAST FOUR DIGITS OF THEIR SOCIAL SECURITY/TAXPAYER IDENTIFICATION NUMBER ON EACH ADDITIONAL PAGE. IF YOU DO ATTACH EXTRA SCHEDULES, CHECK THIS BOX.			

PART III - RELEASE OF CLAIMS AND SIGNATURE

YOU MUST ALSO READ THE RELEASE AND CERTIFICATION BELOW AND SIGN ON PAGE 5 OF THIS CLAIM FORM.

I (we) hereby acknowledge that, pursuant to the terms set forth in the Stipulation, without further action by anyone, upon the Effective Date of the Settlement, I (we), on behalf of myself (ourselves) and my (our) (the claimant(s)') current and former heirs, executors, administrators, predecessors, successors, officers, directors, agents, parents, affiliates, subsidiaries, employees, attorneys, assignees, and assigns, in their capacities as such, shall be deemed to have, and by operation of law and of the judgment shall have, fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged any and all of the Released Plaintiff's Claim against Defendants and the other Defendants' Releasees, and shall forever be barred and enjoined from prosecuting, commencing, instituting, or continuing to prosecute any action or other proceeding in any court of law or equity, arbitration tribunal, or administrative forum, asserting any or all of the Released Plaintiff's Claims against any of the Defendants' Releasees.

CERTIFICATION

By signing and submitting this Claim Form, the claimant(s) or the person(s) who represent(s) the claimant(s) agree(s) to the release above and certifies (certify) as follows:

1. that I (we) have read and understand the contents of the Settlement Notice and this Claim Form, including the releases provided for in the Settlement and the terms of the Plan of Allocation;
2. that the claimant(s) is a (are) Class Member(s), as defined in the Settlement Notice, and is (are) not excluded by definition from the Class as set forth in the Settlement Notice;
3. that the claimant(s) did **not** submit a request for exclusion from the Class;
4. that I (we) own(ed) the Symantec common stock identified in the Claim Form and have not assigned the claim against any of the Defendants or any of the other Defendants' Releasees to another, or that, in signing and submitting this Claim Form, I (we) have the authority to act on behalf of the owner(s) thereof;
5. that the claimant(s) has (have) not submitted any other claim covering the same purchases of Symantec common stock and knows (know) of no other person having done so on the claimant's (claimants') behalf;
6. that the claimant(s) submit(s) to the jurisdiction of the Court with respect to claimant's (claimants') claim and for purposes of enforcing the releases set forth herein;
7. that I (we) agree to furnish such additional information with respect to this Claim Form as Lead Counsel, the Claims Administrator, or the Court may require;
8. that the claimant(s) waive(s) the right to trial by jury, to the extent it exists, and agree(s) to the determination by the Court of the validity or amount of this claim, and waives any right of appeal or review with respect to such determination;
9. that I (we) acknowledge that the claimant(s) will be bound by and subject to the terms of any judgment(s) that may be entered in the Action; and
10. that the claimant(s) is (are) NOT subject to backup withholding under the provisions of Section 3406(a)(1)(C) of the Internal Revenue Code because (i) the claimant(s) is (are) exempt from backup withholding or (ii) the claimant(s) has (have) not been notified by the IRS that he, she, or it is subject to backup withholding as a result of a failure to report all interest or dividends or (iii) the IRS has notified the claimant(s) that he, she, or it is no longer subject to backup withholding. **If the IRS has notified the claimant(s) that he, she, it, or they is (are) subject to backup withholding, please strike out the language in the preceding sentence indicating that the claim is not subject to backup withholding in the certification above.**

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HERewith ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

Signature of claimant

Date

Print claimant name here

Signature of joint claimant, if any

Date

Print joint claimant name here

If the claimant is other than an individual, or is not the person completing this form, the following also must be provided:

Signature of person signing on behalf of claimant

Date

Print name of person signing on behalf of claimant here

Capacity of person signing on behalf of claimant, if other than an individual, *e.g.*, executor, president, trustee, custodian, etc. (Must provide evidence of authority to act on behalf of claimant – see ¶ 7 on page 6 of this Claim Form.)

INSTRUCTIONS AND CHECKLIST

1. **Submission of this Claim Form does not guarantee that you will be eligible to receive a payment from the Settlement. The distribution of the Net Settlement Fund will be governed by the Plan of Allocation set forth in the Settlement Notice, if it is approved by the Court, or by such other plan of allocation as the Court approves.**

2. Use the Schedule of Transactions on page 3 of this Claim Form to supply all required details of your transaction(s) in, and holdings of, common stock of Symantec Corporation (“Symantec”). On this schedule, provide all of the requested information with respect to your holdings, purchases, acquisitions, and sales of Symantec common stock (including free transfers and deliveries), whether such transactions resulted in a profit or a loss. **Failure to report all transaction and holding information during the requested time period may result in the rejection of your claim.**

3. **Please note:** Only publicly traded Symantec common stock purchased during the Class Period (*i.e.*, from May 11, 2017 through August 2, 2018, inclusive) is eligible under the Settlement. However, sales of Symantec common stock during the period from August 3, 2018 through and including the close of trading on October 31, 2018, will be used for purposes of calculating your claim under the Plan of Allocation. Therefore, in order for the Claims Administrator to be able to balance your claim, the requested purchase and sale information during this period must also be provided.

4. You are required to submit genuine and sufficient documentation for all of your transactions in and holdings of Symantec common stock as set forth in the Schedule of Transactions on page 3 of this Claim Form. Documentation may consist of copies of brokerage confirmation slips or monthly brokerage account statements, or an authorized statement from your broker containing the transactional and holding information found in a broker confirmation slip or account statement. The Parties and the Claims Administrator do not independently have information about your investments in Symantec common stock. **IF SUCH DOCUMENTS ARE NOT IN YOUR POSSESSION, PLEASE OBTAIN COPIES OF THE DOCUMENTS OR EQUIVALENT DOCUMENTS FROM YOUR BROKER. FAILURE TO SUPPLY THIS DOCUMENTATION MAY RESULT IN THE REJECTION OF YOUR CLAIM. DO NOT SEND ORIGINAL DOCUMENTS. Please keep a copy of all documents that you send to the Claims Administrator. Also, do not highlight any portion of the Claim Form or any supporting documents.**

5. Use Part I of this Claim Form entitled “CLAIMANT INFORMATION” to identify the beneficial owner(s) of the Symantec common stock. The complete name(s) of the beneficial owner(s) must be entered. If there were joint beneficial owners, each must sign this Claim Form and their names must appear as “Claimants” in Part I of this Claim Form.

6. **One Claim should be submitted for each separate legal entity or separately managed account.** Separate Claim Forms should be submitted for each separate legal entity (*e.g.*, an individual should not combine his or her IRA holdings and transactions with holdings and transactions made solely in the individual’s name). Generally, a single Claim Form should be submitted on behalf of one legal entity including all holdings and transactions made by that entity on one Claim Form. However, if a single person or legal entity had multiple accounts that were separately managed, separate Claims may be submitted for each such account. The Claims Administrator reserves the right to request information on all the holdings and transactions in Symantec common stock made on behalf of a single beneficial owner

7. Agents, executors, administrators, guardians, and trustees must complete and sign the Claim Form on behalf of persons represented by them, and they must:

- (a) expressly state the capacity in which they are acting;
- (b) identify the name, account number, last four digits of the Social Security Number (or taxpayer identification number), address, and telephone number of the beneficial owner of (or other person or entity on whose behalf they are acting with respect to) the Symantec common stock; and
- (c) furnish herewith evidence of their authority to bind to the Claim Form the person or entity on whose behalf they are acting. (Authority to complete and sign a Claim Form cannot be established by stockbrokers demonstrating only that they have discretionary authority to trade securities in another person’s accounts.)

8. By submitting a signed Claim Form, you will be swearing that you:

- (a) owned the Symantec common stock you have listed in the Claim Form; or
- (b) are expressly authorized to act on behalf of the owner thereof.

9. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.

10. If the Court approves the Settlement, payments to eligible Authorized Claimants pursuant to the Plan of Allocation (or such other plan of allocation as the Court approves) will be made after any appeals are resolved, and after the completion of all claims processing. The claims process will take substantial time to complete fully and fairly. Please be patient.

11. **PLEASE NOTE:** As set forth in the Plan of Allocation, each Authorized Claimant shall receive his, her, or its *pro rata* share of the Net Settlement Fund. If the prorated payment to any Authorized Claimant calculates to less than \$10.00, it will not be included in the calculation and no distribution will be made to that Authorized Claimant.

12. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Settlement Notice, you may contact the Claims Administrator, A.B. Data, Ltd., at the above address, by email at info@SymantecSecuritiesLitigation.com, or by toll-free phone at 1-800-949-0206, or you can visit the Settlement website, www.SymantecSecuritiesLitigation.com, where copies of the Claim Form and Settlement Notice are available for downloading.

13. **NOTICE REGARDING ELECTRONIC FILES:** Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. To obtain the **mandatory** electronic filing requirements and file layout, you may visit the Settlement website at www.SymantecSecuritiesLitigation.com or you may email the Claims Administrator's electronic filing department at info@SymantecSecuritiesLitigation.com. **Any file not in accordance with the required electronic filing format will be subject to rejection.** The **complete** name of the beneficial owner of the securities must be entered where called for (*see* ¶ 5 above). No electronic files will be considered to have been submitted unless the Claims Administrator issues an email to that effect. **Do not assume that your file has been received until you receive this email. If you do not receive such an email within 10 days of your submission, you should contact the electronic filing department at info@SymantecSecuritiesLitigation.com to inquire about your file and confirm it was received.**

IMPORTANT: PLEASE NOTE

YOUR CLAIM IS NOT DEEMED FILED UNTIL YOU RECEIVE AN ACKNOWLEDGEMENT POSTCARD. THE CLAIMS ADMINISTRATOR WILL ACKNOWLEDGE RECEIPT OF YOUR CLAIM FORM WITHIN 60 DAYS OF YOUR SUBMISSION. IF YOU DO NOT RECEIVE AN ACKNOWLEDGEMENT POSTCARD WITHIN 60 DAYS, CONTACT THE CLAIMS ADMINISTRATOR TOLL FREE AT 1-800-949-0206.

REMINDER CHECKLIST

1. Sign the above release and certification. If this Claim Form is being made on behalf of joint claimants, then both must sign.
2. Attach only *copies* of acceptable supporting documentation as these documents will not be returned to you.
3. Do not highlight any portion of the Claim Form or any supporting documents.
4. Keep copies of the completed Claim Form and documentation for your own records.
5. The Claims Administrator will acknowledge receipt of your Claim Form by mail, within 60 days of your submission. Your claim is not deemed filed until you receive an acknowledgement postcard. **If you do not receive an acknowledgement postcard within 60 days, please call the Claims Administrator toll free at 1-800-949-0206.**
6. If your address changes in the future, or if this Claim Form was sent to an old or incorrect address, you must send the Claims Administrator written notification of your new address. If you change your name, inform the Claims Administrator.
7. If you have any questions or concerns regarding your claim, contact the Claims Administrator at the address below, by email at info@SymantecSecuritiesLitigation.com, or by toll-free phone at 1-800-949-0206, or you may visit www.SymantecSecuritiesLitigation.com. **DO NOT** call Symantec or its counsel with questions regarding your claim.

THIS CLAIM FORM MUST BE MAILED TO THE CLAIMS ADMINISTRATOR BY FIRST-CLASS MAIL OR SUBMITTED ONLINE AT WWW.SYMANTECSECURITIESLITIGATION.COM, **POSTMARKED (OR RECEIVED) NO LATER THAN 28 DAYS AFTER THE COURT'S APPROVAL OF THE SETTLEMENT.** The Settlement website, www.SymantecSecuritiesLitigation.com, will be updated to inform Class Members of the date of approval of the Settlement and the final claim filing deadline. **THE CLAIM FILING DEADLINE MAY BE AS EARLY AS MARCH 10, 2022.** IF MAILED, THE CLAIM FORM SHOULD BE ADDRESSED AS FOLLOWS:

Symantec Securities Litigation
c/o A.B. Data, Ltd.
P.O. Box 173106
Milwaukee, WI 53217

A Claim Form received by the Claims Administrator shall be deemed to have been submitted when posted, if a postmark date before the deadline is indicated on the envelope and it is mailed First Class, and addressed in accordance with the above instructions. In all other cases, a Claim Form shall be deemed to have been submitted when actually received by the Claims Administrator.

You should be aware that it will take a significant amount of time to fully process all of the Claim Forms. Please be patient and notify the Claims Administrator of any change of address.

EXHIBIT B

INTERNATIONAL

Covid fight focuses on older vaccine holdouts

Efforts to reduce the threat of a devastating winter wave are targeting the most vulnerable group declining jobs

OLIVER BARNES AND JOHN BURN-MURDOCH — LONDON

As winter looms, western nations have put their faith in booster shots and child vaccination campaigns to fortify their defences against a Covid-19 resurgence.

But health authorities in the northern hemisphere fear the size of any wave during colder months could hinge on how many vaccine holdouts remain among older, vulnerable people.

Officials in Europe and the US, keen to avert the increased burden on hospitals that could accompany a surge, are asking whether they can win over the most hesitant elderly people and have examined the impact of other measures, such as making vaccines compulsory.

Vaccine mandates have largely been credited with boosting uptake rates in younger groups, but several European nations have observed a similar effect among elderly people as well.

A Financial Times analysis of Public Health England data showed it took about 800 double doses to prevent one hospital admission in the over-60s over a four-week period, but about 25,000 double doses to achieve the same in the under-18s, because of older groups’ greater vulnerability to severe disease.

England ranks alongside Spain, Portugal, Denmark and Ireland, among others, as a nation with the highest Covid vaccination rates in older groups. More than 13m, or 95 per cent, of over-60s in England have had their first dose, according to PHE. But that still leaves nearly 600,000 holdouts in that age group, which has accounted for more than 90 per cent of coronavirus deaths.

In the US, particularly the southern states, the picture is more stark. More than 3m aged over 65 are yet to have a first jab, including almost one in 10 of the over-75s. Last month, President Joe Biden lamented the “pandemic of the unvaccinated” for the disproportionate pressure holdouts were putting on hospital wards and intensive care units.

Kevin Schulman, professor of medicine at Stanford University, said the next phase of the pandemic would be a “damn sight easier” in Europe than in the US because of high vaccine uptake rates among elderly people.

Schulman said the vaccine had become politicised. “The elderly groups that are not vaccinated are very focused on alternative media, which is delivering conflicting messages,” he said. “We need to think about how we infiltrate that space with new messages.”

Without finding effective ways to



President Joe Biden, 78, has his Covid booster jab last month in Washington

Cost of living

Turkey inflation hits 2 ½-year high as interest rates slashed

LAURA PITEL — ANKARA

Turkish inflation accelerated to its fastest rate in two-and-a-half years in September as President Recep Tayyip Erdogan stepped up his unconventional efforts to bring down prices.

Data released yesterday by Turkey’s official statistics agency showed the consumer price index rose at an annual rate of 19.58 per cent last month, up from 19.25 per cent in August. The rate is nearly four times the central bank’s official inflation target and the biggest yearly increase since March 2019.

Erdogan, whose ruling party is suffering from historically low poll ratings, has faced growing public discontent over the soaring cost of living.

But the Turkish leader, who believes contrary to economic orthodoxy that high interest rates cause inflation rather than curb it, has pressured the central bank to lower borrowing costs even amid rising prices. The bank slashed its benchmark lending rate last month.

The decision, which left Turkey with the deepest negative interest rate of any emerging market, put fresh pressure on the Turkish lira.

Public anger has focused in particular on food prices, which have accelerated even faster than the headline inflation rate. The cost of food rose almost 29 per cent in September, say the latest data.

Erdogan has blamed rising prices on “opportunists” in food and retail. Last month, his government announced a fresh round of investigations into super-

change people’s minds, holdouts would be converted in the “most tragic way”, he said, seeing unvaccinated relatives, friends and neighbours fall severely ill with coronavirus over winter.

This effect is visible in states hard hit by the highly infectious Delta variant, where images of packed ICUs dominated the local TV news over summer.

In Florida, daily first-dose uptake among the over-65s had fallen to 0.03 per cent by July, but as Delta swept the state the figure rose to 0.11 per cent a day. Mississippi hit a low of 0.03 per cent in early summer before bouncing back to 0.17 per cent daily uptake among over-65s once Delta took hold.

Noel Brewer, professor of health behaviours at the University of North Carolina, said this phenomenon had led to an “almost perfect overlap” between new Covid cases and uptake rates.

Brewer said the first-dose drive would show a “last burst of energy” over winter as financial incentive schemes, a surge of infections and a wave of new vaccine mandates increased the pressure on older people to get the jab.

Vaccine mandates have worked in some European countries. Daily vaccination rates in the over-60s in France, Lithuania and Slovenia fell from about 1 per cent over spring to 0.1 per cent by summer before rebounding after vaccine passports were announced.

Arunas Dulkys, Lithuania’s health minister, said the “passport of opportunities” introduced in September aimed in part to ensure that older Lithuanians did not fall severely ill in droves.

“Vaccine passports put the power in citizens’ hands,” he said. “In each society, people exist who like to free ride. They think: ‘we will wait and you will solve our problems’, but the passport engages people as part of the solution.”

Angus Thomson, former head of vaccine confidence at Sanofi Pasteur, the

market chains that it accused of adopting “unreasonable” price increases.

On Sunday, the president said he had ordered agricultural co-operatives to open about 1,000 new branches across the country in order to provide “suitable” prices for basic goods.

“We gave the order for about 1,000 of these businesses to open around Turkey, starting at 500 square metres each,” he said. “These are places where prices are suitable to our citizens’ budgets.”

Erdogan, who built much of his early political success on the back of ushering in rising prosperity, has developed a reputation for eccentric and erratic solutions to economic problems.

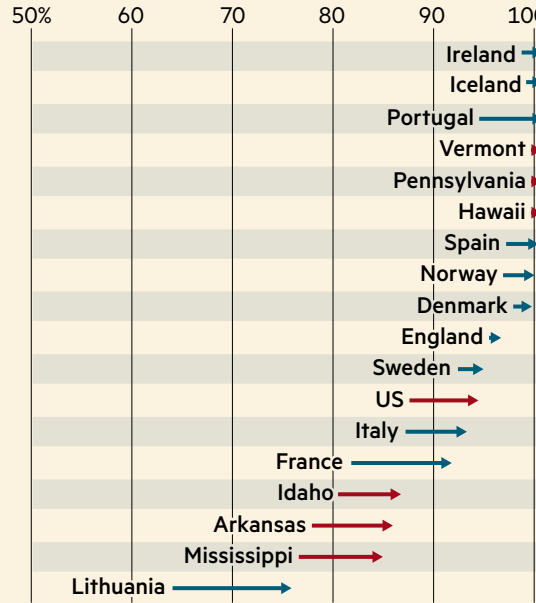
In 2018, in the wake of a currency crisis that wiped almost 30 per cent off the value of the lira, the government launched a campaign urging retailers to hold down their prices. The following year, the government launched municipal-run “people’s vegetable” stalls in large cities in an effort to combat what Erdogan called “food terrorism”.

Analysts warn high inflation and low interest rates could lead to fresh pressure on the lira, which has hovered in recent weeks above what would have been a record low of nine to the dollar.

“The further rise in both headline and core inflation last month will provide some food for thought for the central bank, but we doubt that it will prevent it from pushing ahead with further interest rate cuts,” said Jason Tuvey, an economist at the London-based consultancy Capital Economics.

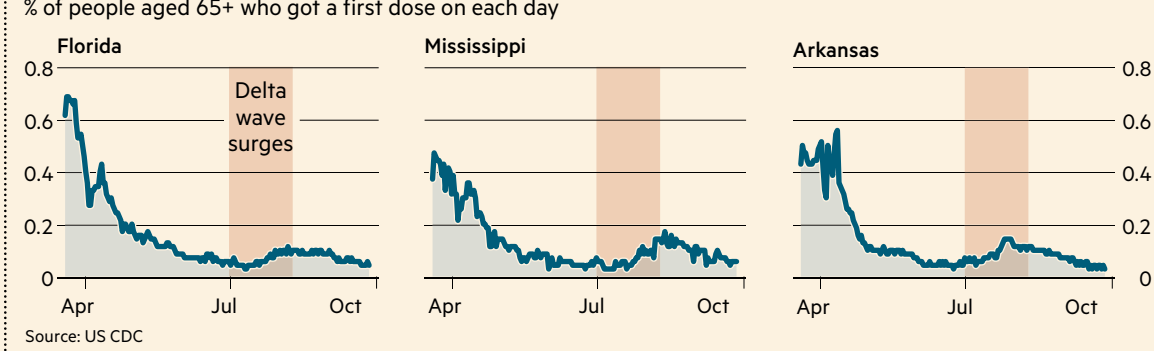
Vaccination coverage among the old and most vulnerable has climbed steadily

Share of people aged 60+ with at least one dose (%), progress between end of June and end of September in selected European countries and US states

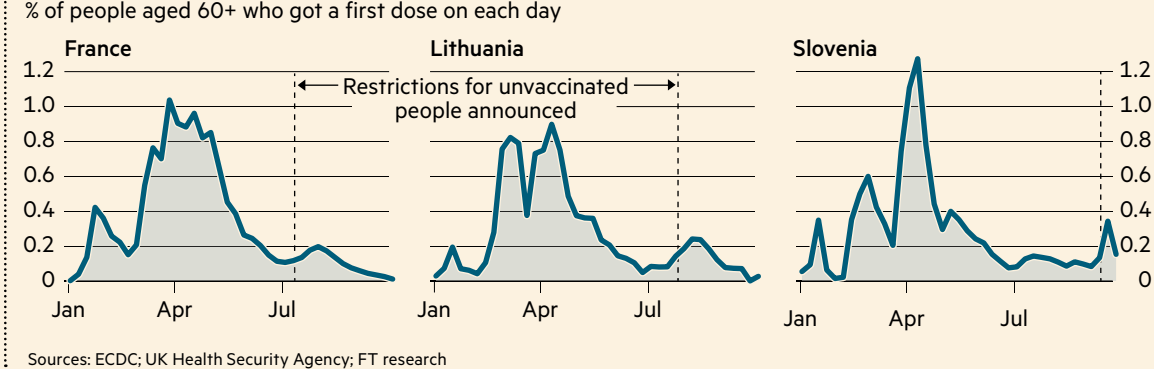


*Figures for the US refer to age 65+
Sources: ECDC; US CDC

In the US, the severity of the summer Delta wave spurred many holdouts into getting jabbed



In Europe, vaccine mandates triggered a bump in uptake



UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

SEB INVESTMENT MANAGEMENT AB, individually and on behalf of all others similarly situated

Plaintiffs,

v.

SYMANTEC CORPORATION and GREGORY S. CLARK, Defendants.

Case No. 3:18-cv-02902-WHA

ECF CASE

Dept.: Courtroom 12, 19th Floor
Judge: Honorable William Alsup

SUMMARY NOTICE OF (I) PROPOSED SETTLEMENT AND PLAN OF ALLOCATION; (II) SETTLEMENT HEARING; AND (III) MOTION FOR ATTORNEYS’ FEES AND LITIGATION EXPENSES

To: All persons and entities that, during the period from May 11, 2017 to August 2, 2018, inclusive (the “Class Period”), purchased or otherwise acquired shares of the publicly traded common stock of Symantec Corporation (“Symantec”) and were damaged thereby (the “Class”).¹

PLEASE READ THIS NOTICE CAREFULLY; YOUR RIGHTS WILL BE AFFECTED BY THE SETTLEMENT OF A CLASS ACTION LAWSUIT PENDING IN THIS COURT.

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Northern District of California, that the Court-appointed Class Representative, SEB Investment Management AB, on behalf of itself and the Court-certified Class, in the above-captioned securities class action (the “Action”) has reached a proposed settlement of the Action with defendants Symantec Corporation, now known as NortonLifeLock Inc. (“Symantec”) and Gregory S. Clark (collectively, “Defendants”) for \$70,000,000 in cash that, if approved, will resolve all claims in the Action.

A hearing will be held on February 10, 2022 at 11:00 a.m. Pacific Time, before the Honorable William Alsup, either in person at the United States District Court for the Northern District of California, San Francisco Courthouse, Courtroom 12 – 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102, or by telephone or videoconference (in the discretion of the Court) to determine: (i) whether the proposed Settlement should be approved as fair, reasonable, and adequate; (ii) whether the Action should be dismissed with prejudice against Defendants, and the releases specified and described in the Stipulation and Agreement of Settlement dated June 8, 2021 should be granted; (iii) whether the proposed Plan of Allocation should be approved as fair and reasonable; and (iv) whether Lead Counsel’s application for an award of attorneys’ fees and payment of expenses should be approved.

Lead Counsel, which has been prosecuting the Action on a wholly contingent basis, has not received any payment of attorneys’ fees for their representation of the Class and have advanced the funds to pay expenses necessarily incurred to prosecute the Action. Lead Counsel will apply to the Court for an award of attorneys’ fees in an amount not to exceed 19% of the Settlement Fund, or \$13.3 million, plus interest. In addition, Lead Counsel will apply for payment of Litigation Expenses in connection with the institution, prosecution, and resolution of the Action in an amount not to exceed \$2.5 million. The total Notice and Administration Costs are estimated to be \$415,000. Any fees and expenses awarded by the Court will be paid from the Settlement Fund. Class Members are not personally liable for any such fees or expenses. If the Court approves Lead Counsel’s fee and expense application, and based on the current estimate of Notice and Administration Costs, the portion of the Settlement Fund that will be distributed to Class Members will be approximately \$53,785,000, plus interest accrued.

If you purchased or otherwise acquired Symantec common stock during the Class Period and are a member of the Class, your rights will be affected by the pending Action and the Settlement, and you may be entitled to share in the Net Settlement Fund. If you have not yet received the full printed Notice of (I) Proposed Settlement and Plan of Allocation; (II) Settlement Hearing; and (III) Motion for Attorneys’ Fees and Litigation Expenses (the “Settlement Notice”) and the Claim Form, you may obtain copies of these documents by contacting the Claims Administrator at *Symantec Securities Litigation*, c/o A.B. Data, P.O. Box 173106, Milwaukee, WI 53217, 1-800-949-0206, info@SymantecSecuritiesLitigation.com. Copies of the Settlement Notice and Claim Form can also be downloaded from the website for the Action, www.SymantecSecuritiesLitigation.com.

If you are a Class Member, in order to be eligible to receive a payment under the proposed Settlement, you must submit a Claim Form **online or postmarked no later than 28 days after the Court approves the Settlement. The deadline may be as early as March 10, 2022.** The Settlement website, www.SymantecSecuritiesLitigation.com, will be updated to inform Class Members of the approval of the Settlement, if and when that occurs. If you are a Class Member and do not submit a proper Claim Form, you will not be eligible to share in the distribution of the net proceeds of the Settlement but you will nevertheless be bound by any judgments or orders entered by the Court in the Action.

If you are a member of the Class and wish to exclude yourself from the Class, you must submit a request for exclusion such that it is **received no later than January 13, 2022 at midnight**, in accordance with the instructions set forth in the Notice. If you properly exclude yourself from the Class, you will not be bound by any judgments or orders entered by the Court in the Action and you will not be eligible to share in the proceeds of the Settlement or object to the Settlement.

Any objections to the proposed Settlement, the proposed Plan of Allocation, and/or Class Counsel’s application for attorneys’ fees and payment of expenses, must be filed with the Court and delivered to Class Counsel and counsel for Defendants such that they are **received no later than January 13, 2022 at midnight**, in accordance with the instructions set forth in the Settlement Notice.

Please do not contact the Court, the Clerk’s office, Symantec, any other Defendants in the Action, or their counsel regarding this notice. All questions about this notice, the proposed Settlement, or your eligibility to participate in the Settlement should be directed to the Claims Administrator or Class Counsel.

Requests for the Settlement Notice and Claim Form should be made to:

Symantec Securities Litigation
c/o A.B. Data, Ltd.
P.O. Box 173106
Milwaukee, WI 53217
1-800-949-0206
info@SymantecSecuritiesLitigation.com
www.SymantecSecuritiesLitigation.com

Inquiries, other than requests for the Settlement Notice and Claim Form, may be made to Class Counsel:

Bernstein Litowitz Berger & Grossmann LLP
Jeremy P. Robinson, Esq.
1251 Avenue of the Americas
New York, NY 10020
1-800-380-8496
settlements@blbglaw.com

pharma group, said France’s passport scheme helped. “It was somewhere between a nudge and a shove,” he said. “Suddenly people were faced with: go to a café, don’t go to a café, go out for an aperitif, don’t go out for an aperitif, go shopping, don’t go shopping.”

Italy has gone further, extending the reach of mandates from hospitality venues to all workplaces, and becoming the first western nation to consider whole-sale mandatory vaccination. But Italian health authorities have had limited success in swaying older groups. Some 2.8m Italians over 60 are still unvaccinated.

Anna Odone, professor of public health at Pavia university, said: “Everything now has to become very personalised to appeal to individuals. That means going door to door to find these older people and convince them.”

Mandatory jabs remained on the table “as a last resort” but would be an admission of “defeat” for public health communication. If Italy were to impose mandatory jabs, it would join Indonesia, the Federated States of Micronesia and Turkmenistan. “That’s odd company for us to keep,” added Odone.

¹ Certain persons and entities are excluded from the Class by definition and others are excluded pursuant to request. The full definition of the Class including a complete description of who is excluded from the Class is set forth in the full Settlement Notice referred to below.

EXHIBIT C

ADVERTISEMENT

The Marketplace

To advertise: 800-366-3975 or WSJ.com/classifieds

CLASS ACTION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SEB INVESTMENT MANAGEMENT AB, individually and on behalf of all others similarly situated

v.

Plaintiffs,

SYMANTEC CORPORATION and GREGORY S. CLARK,

Defendants.

SUMMARY NOTICE OF (I) PROPOSED SETTLEMENT
AND PLAN OF ALLOCATION; (II) SETTLEMENT HEARING; AND
(III) MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES

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A hearing will be held on February 10, 2022 at 11:00 a.m. Pacific Time, before the Honorable William Alsup, either in person at the United States District Court for the Northern District of California, San Francisco Courthouse, Courtroom 12 - 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102, or by telephone or videoconference (in the discretion of the Court) to determine: (i) whether the proposed Settlement should be approved as fair, reasonable, and adequate; (ii) whether the Action should be dismissed with prejudice against Defendants, and the releases specified and described in the Stipulation and Agreement of Settlement dated June 8, 2021 should be granted; (iii) whether the proposed Plan of Allocation should be approved as fair and reasonable; and (iv) whether Lead Counsel's application for an award of attorneys' fees and payment of expenses should be approved.

Lead Counsel, which has been prosecuting the Action on a wholly contingent basis, has not received any payment of attorneys' fees for their representation of the Class and have advanced the funds to pay expenses necessarily incurred to prosecute the Action. Lead Counsel will apply to the Court for an award of attorneys' fees in an amount not to exceed 19% of the Settlement Fund, or \$13.3 million, plus interest. In addition, Lead Counsel will apply for payment of Litigation Expenses in connection with the institution, prosecution, and resolution of the Action in an amount not to exceed \$2.5 million. The total Notice and Administration Costs are estimated to be \$415,000. Any fees and expenses awarded by the Court will be paid from the Settlement Fund. Class Members are not personally liable for any such fees or expenses. If the Court approves Lead Counsel's fee and expense application, and based on the current estimate of Notice and Administration Costs, the portion of the Settlement Fund that will be distributed to Class Members will be approximately \$53,785,000, plus interest accrued.

If you purchased or otherwise acquired Symantec common stock during the Class Period and are a member of the Class, your rights will be affected by the pending Action and the Settlement, and you may be entitled to share in the Net Settlement Fund. If you have not yet received the full printed Notice of (I) Proposed Settlement and Plan of Allocation; (II) Settlement Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses (the "Settlement Notice") and the Claim Form, you may obtain copies of these documents by contacting the Claims Administrator at SymantecSecuritiesLitigation.com, c/o A.B. Data, P.O. Box 173106, Milwaukee, WI 53217, 1-800-949-0206, info@SymantecSecuritiesLitigation.com. Copies of the Settlement Notice and Claim Form can also be downloaded from the website for the Action, www.SymantecSecuritiesLitigation.com.

If you are a Class Member, in order to be eligible to receive a payment under the proposed Settlement, you must submit a Claim Form *online or postmarked no later than 28 days after the Court approves the Settlement. The deadline may be as early as March 10, 2022.* The Settlement website, www.SymantecSecuritiesLitigation.com, will be updated to inform Class Members of the approval of the Settlement, if and when that occurs. If you are a Class Member and do not submit a proper Claim Form, you will not be eligible to share in the distribution of the net proceeds of the Settlement but you will nevertheless be bound by any judgments or orders entered by the Court in the Action.

If you are a member of the Class and wish to exclude yourself from the Class, you must submit a request for exclusion such that it is *received no later than January 13, 2022 at midnight*, in accordance with the instructions set forth in the Notice. If you properly exclude yourself from the Class, you will not be bound by any judgments or orders entered by the Court in the Action and you will not be eligible to share in the proceeds of the Settlement or object to the Settlement.

Any objections to the proposed Settlement, the proposed Plan of Allocation, and/or Class Counsel's application for attorneys' fees and payment of expenses, must be filed with the Court and delivered to Class Counsel and counsel for Defendants such that they are *received no later than January 13, 2022 at midnight*, in accordance with the instructions set forth in the Settlement Notice.

Please do not contact the Court, the Clerk's office, Symantec, any other Defendants in the Action, or their counsel regarding this notice. All questions about this notice, the proposed Settlement, or your eligibility to participate in the Settlement should be directed to the Claims Administrator or Class Counsel.

Requests for the Settlement Notice and Claim Form should be made to:

Symantec Securities Litigation
c/o A.B. Data, Ltd.
P.O. Box 173106
Milwaukee, WI 53217
1-800-949-0206

info@SymantecSecuritiesLitigation.com
www.SymantecSecuritiesLitigation.com

Inquiries, other than requests for the Settlement Notice and Claim Form, may be made to Class Counsel:

Bernstein Litowitz Berger & Grossmann LLP
Jeremy P. Robinson, Esq.
1251 Avenue of the Americas
New York, NY 10020
1-800-345-4566
settlements@blbglaw.com

By Order of the Court

1 Certain persons and entities are excluded from the Class by definition and others are excluded pursuant to request. The full definition of the Class including a complete description of who is excluded from the Class is set forth in the full Settlement Notice referred to below.

BANKRUPTCIES

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: BOY SCOUTS OF AMERICA
AND DELAWARE BSA, LLC,
Debtors.

Chapter 11
Case No. 20-10343 (LSS)
(Jointly Administered)

Hearing Date: January 24, 2022, at 10:00 a.m. (ET)
Objection Deadline: January 7, 2022 at 4:00 p.m. (ET)
**NOTICE OF (I) DEADLINE FOR CASTING VOTES TO ACCEPT OR REJECT
PROPOSED MODIFIED FIFTH AMENDED CHAPTER 11 PLAN OF
REORGANIZATION FOR BOY SCOUTS OF AMERICA AND DELAWARE
BSA, LLC, (II) HEARING TO CONSIDER CONFIRMATION OF PLAN,
AND (III) RELATED MATTERS**

PLEASE TAKE NOTICE THAT on September 30, 2021, the above-captioned debtors and debtors-in-possession (together, the "Debtors") filed with the Court the following:

- the Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC (D.I. 6443) (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the "Plan");² and
- the Disclosure Statement for the Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC (D.I. 6445) (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the "Disclosure Statement").

The Plan contains releases of the Debtors and certain third parties and related injunction provisions. These provisions could release and prohibit holders of Abuse Claims from filing lawsuits and asserting such claims against the BSA and certain non-debtor third parties, including local councils, Contributing Chartered Organizations, including TCJC, Settling Insurance Companies, including Hartford, and Participating Chartered Organizations, solely with respect to Post-1975 Chartered Organization Abuse Claims. Chartered Organizations are organizations that sponsor a Scouting unit, such as a troop or pack. The Plan provides a mechanism by which Abuse Claims against the BSA and certain-debtor third parties, including the Local Councils, Contributing Chartered Organizations, including TCJC, Settling Insurance Companies, including Hartford, and Participating Chartered Organizations, solely with respect to Post-1975 Chartered Organization Abuse Claims, will be channeled to a trust established pursuant to section 105(a) of the Bankruptcy Code.

Each Chartered Organization will automatically be deemed to be a Participating Chartered Organization under the Plan unless it (1) submits the opt out election form on or before the Plan Objection Deadline, (2) objects to confirmation of the Plan in accordance with the Notice of Hearing to Consider Confirmation of Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC, attached as Exhibit A to the Solicitation Procedures Order and available at <https://omniagentsolutions.com/BSA> on or before the Plan Objection Deadline, or (3) is a debtor in bankruptcy as of the date of confirmation of the Plan. Participating Chartered Organizations shall receive certain limited protections under the Channeling Injunction, including the channeling of all Abuse Claims against such Participating Chartered Organizations that relate to Abuse alleged to have first occurred on or after January 1, 1976, in exchange for contribution to the Settlement Trust of Participating Chartered Organizations' rights under Abuse Insurance Policies issued on or after January 1, 1976.

Confirmation of the Plan is supported by the Debtors, the Future Claimants' Representative, the Creditors' Committee, the Coalition, and the Ad Hoc Committee of Local Councils. You should carefully review the Plan and the applicable release, injunction, and related provisions at <https://omniagentsolutions.com/BSA>.

PLEASE TAKE FURTHER NOTICE THAT:

- On September 30, 2021, the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court") entered an order (D.I. 6438) (the "Solicitation Procedures Order") approving the Disclosure Statement. The Solicitation Procedures Order, among other things, authorizes the Debtors to solicit votes to accept or reject the Plan and establishes procedures related thereto (the "Solicitation Procedures").
- The Bankruptcy Court has scheduled a hearing to consider whether to confirm the Plan beginning on **January 24, 2022 at 10:00 a.m. (Eastern Time)** (the "Confirmation Hearing"), which shall continue to the extent necessary on such dates as the Bankruptcy Court may designate. The Confirmation Hearing will be held before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge, at the Bankruptcy Court, located at 824 North Market Street, Sixth Floor, Courtroom No. 2, Wilmington, Delaware 19801.
- Pursuant to the Solicitation Procedures Order, the Bankruptcy Court approved the Solicitation Procedures, which are attached to the Solicitation Procedures Order as Exhibit 1. Holders of Claims in Class 3A (2010 Credit Facility Claims), Class 3B (2019 RCF Claims), Class 4A (2010 Bond Claims), Class 4B (2012 Bond Claims), Class 5 (Convenience Claims), Class 6 (General Unsecured Claims), Class 7 (Non-Abuse Litigation Claims), Class 8 (Direct Abuse Claims), and Class 9 (Indirect Abuse Claims) (collectively, the "Voting Classes") are entitled to receive a ballot for casting a vote on the Plan (a "Ballot"). Holders of Claims and Interests in all other Classes under the Plan are not entitled to accept or are deemed to reject the Plan. For a vote to accept or reject the Plan to be counted, a Ballot must be completed and returned in accordance with the instructions provided on the **Ballot so that it is received by December 14, 2021 at 4:00 p.m. (Eastern Time)** (the "Voting Deadline").
- Pursuant to the Plan, holders of Claims in the Voting Classes are entitled to vote on account of their respective Claims. If you have not received a Ballot and are entitled to vote on the Plan, you may request a Ballot and voting instructions from Omni Agent Solutions (the "Solicitation Agent"), by (a) calling the Debtors' toll-free restructuring hotline at 866-907-2721, (b) emailing BSABallots@omniagent.com, (c) writing to Boy Scouts of America Ballot Processing, c/o Omni Agent Solutions, 5955 De Soto Avenue, Suite

- 100, Woodland Hills, CA 91367, or (d) submitting an inquiry on the Debtors' restructuring website at <https://omniagentsolutions.com/BSA>, and submit your Ballot as set forth above so that it is received by the Voting Deadline.
5. Pursuant to the Solicitation Procedures, all Direct and Indirect Abuse Claims in Class 8 and Class 9 of the Plan will be temporarily allowed in the amount of \$1.0M in the aggregate per claimant or as otherwise ordered by the Bankruptcy Court, solely for purposes of voting to accept or reject the Plan and not for any other purpose. If you have filed a Proof of Claim that is subject to an objection other than a "reclassify" or "reduce and allow" objection that is filed with the Bankruptcy Court on or before the Solicitation Date (a "Disputed Claim") and seek to challenge the disallowance or estimation of your Disputed Claim for voting purposes, you must file with the Bankruptcy Court a motion for an order, pursuant to Bankruptcy Rule 3018(a), temporarily allowing such claim for purposes of voting to accept or reject the Plan (a "Rule 3018(a) Motion"). Any Rule 3018(a) Motion must be filed with the Bankruptcy Court and served on the Debtors on or before **November 1, 2021**. If a holder of a Disputed Claim files a timely Rule 3018(a) Motion, such holder's Ballot shall not be counted unless a Resolution Event occurs with respect to such Disputed Claim prior to **December 14, 2021**, or as otherwise ordered by the Bankruptcy Court.
6. The Plan proposes certain releases and injunctions in furtherance of the Plan. The Plan proposes a Channeling Injunction that permanently channels all Abuse Claims against the Debtors and the Protected Parties and Limited Protected Parties to a Settlement Trust established pursuant to section 105(a) of the Bankruptcy Code. In addition, the Plan proposes an injunction that permanently enjoins the pursuit of any claim against or interest in the Debtors, Reorganized BSA, the Settlement Trust, or its or their respective property to the extent such claim or interest has been discharged, released, waived, settled, or deemed satisfied in accordance with the Plan (other than the enforcement of any right pursuant to the Plan). For the specific terms and conditions of all the releases and injunctions provided for in the Plan, and the precise scope of the Claims and Demands to be channeled, please refer to the specific terms of the Plan, which can be obtained as described below.
7. If the Plan is approved by the Bankruptcy Court, all current and future holders of Abuse Claims against the Debtors can request and receive money only from the Settlement Trust. You should read the Plan and Disclosure Statement carefully for details about how the Plan, if approved, will affect your rights.
8. The Bankruptcy Court has issued the Solicitation Procedures Order describing how to vote on the Plan, and the Disclosure Statement contains information that will help you decide how to vote. Your legal rights will be affected if the Plan is approved.
9. Under the Solicitation Procedures approved by the Bankruptcy Court, attorneys for holders of Direct Abuse Claims may vote on the Plan on behalf of their clients, if authorized by each client. If you are unsure whether your attorney is authorized to vote on your behalf, please contact your attorney.
10. If you would like to object to the Plan, you may do so by filing your objection no later than **January 7, 2022 at 4:00 p.m. (Eastern Time)** (the "Plan Objection Deadline"). Any objections or responses to confirmation of the Plan, must: (a) be in writing; (b) state the name and address of the objecting party and the nature and amount of the Claim of such party; (c) state with particularity the legal and factual basis and nature of any objection to the Plan and include any evidentiary support therefor; and (d) be filed with the Bankruptcy Court, 824 North Market Street, Third Floor, Wilmington, Delaware 19801 together with proof of service on or before the **Plan Objection Deadline**, and served so as to be actually received by the parties listed in the Confirmation Hearing Notice (the "Notice Parties") on or before the Plan Objection Deadline, which service may be through the CM/ECF system, with courtesy copies by email to the Notice Parties.
- OBJECTIONS NOT TIMELY FILED AND SERVED STRICTLY AS PROVIDED HEREIN MAY NOT BE CONSIDERED BY THE BANKRUPTCY COURT AND MAY BE DEEMED OVERRULED WITHOUT FURTHER NOTICE.**
- If you would like to review the Plan, the Disclosure Statement, the Solicitation Procedures Order, or other documents related to the Plan free of charge, you may obtain these documents from the Solicitation Agent by: (a) calling the Debtors' toll-free restructuring hotline at 866-907-2721, (b) emailing BSABallots@omniagent.com, (c) writing to Boy Scouts of America Ballot Processing, c/o Omni Agent Solutions, 5955 De Soto Avenue, Suite 100, Woodland Hills, CA 91367, or (d) submitting an inquiry on the Debtors' restructuring website at <https://omniagentsolutions.com/BSA>. You may also access from these materials for a fee via PACER at <http://www.deb.uscourts.gov/>.
- Dated: October 8, 2021. WHITE & CASE LLP, Jessica C. Lauria (admitted pro hac vice), 1221 Avenue of the Americas, New York, New York 10020, Telephone: (212) 819-8200, Email: jessica.lauria@whitecase.com, and WHITE & CASE LLP, Michael C. Andolina (admitted pro hac vice), Matthew E. Linder (admitted pro hac vice), Laura E. Baccash (admitted pro hac vice), Blair M. Warner (admitted pro hac vice), 111 South Wacker Drive, Chicago, Illinois 60606, Telephone: (312) 881-5400, Email: mandolina@whitecase.com, minder@whitecase.com, laura.baccash@whitecase.com, blair.warner@whitecase.com, and MORRIS, NICHOLS, ARSHT & TUNNELL LLP, Derek C. Abbott (No. 3376), Andrew R. Remming (No. 5120), Paige N. Topper (No. 6470), 1201 North Market Street, 16th Floor, P.O. Box 1347, Wilmington, Delaware 19801-1347, Telephone: (302) 658-9200, Email: dabbott@mnorrisnichols.com, arenmng@mnorrisnichols.com, ptopper@mnorrisnichols.com, mnorrisnichols.com, Attorneys for the Debtors and Debtors in Possession
- The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300); and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Lane, Irving, Texas 75038.
- Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Plan, the Disclosure Statement, or the Solicitation Procedures (as defined below), as applicable.

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PUBLIC NOTICES

ADVERTISEMENT OF HEARING OF ORIGINATING NOTICE OF MOTION

THE HIGH COURT OF IRELAND
COMMERCIAL
Record No. 2021/245 C05

IN THE MATTER OF DOLE PLC

AND IN THE MATTER OF THE COMPANIES ACT 2014

AND IN THE MATTER OF A PROPOSED REDUCTION OF CAPITAL PURSUANT TO SECTIONS 84 TO 86 OF THE COMPANIES ACT 2014

NOTICE IS HEREBY GIVEN that an Originating Notice of Motion issued out of the High Court of Ireland (the "Court") on 29 September 2021, seeking the Court's confirmation of the special resolution of Dole plc (the "Company") passed on 2 July 2021 approving the reduction of the company capital of the Company by the cancellation of the amount of US\$428,197,201.38 standing to the balance of the Company's share premium account, being the amount recorded as share premium in the company capital of the Company as a consequence of the ordinary shares which were issued in accordance with the terms and conditions set forth in the transaction agreement dated 16 February 2021 (as amended) by and among Total Produce plc, Total Produce USA Holdings Inc., the Company, TP-Dole Merger Sub, LLC, DFC Holdings, LLC, The Murdoch Group, LLC, Delicous Corporation and Castle & Cooke Holdings, Inc. (including the share premium resulting from the initial public offering of the Company's ordinary shares on the New York Stock Exchange), or such lesser amount as the Court may determine, is directed to be heard in the Commercial List of the Court, sitting at the Four Courts, Inns Quay, Dublin 7, Ireland at 2:00 p.m. (Irish time) on 1 November 2021 (the "Hearing"). Any creditor or shareholder of the Company wishing to support or oppose the making of any order at the Hearing (an "Interested Party") that wishes to obtain a copy of the Originating Notice of Motion and grounding affidavit should contact the Solicitors for the Company at the address or email addresses below. Any Interested Party intending to so appear should give notice in writing to the Solicitors for the Company by no later than 5:30 p.m. (Irish time) on 28 October 2021, and any affidavit in support of any such appearance should be filed with the Solicitors for the Company, by no later than 5:30 p.m. (Irish time) on 28 October 2021.

8 October 2021

ARTHUR COX LLP
Solicitors for the Company
10 Earlsfort Terrace
Dublin 2
D02 T380
Ireland
Email: connor.manning@arthurcox.com / domhnall.breatnach@arthurcox.com (Ref: C2M/DTB)

ADVERTISEMENT OF HEARING OF ORIGINATING NOTICE OF MOTION

THE HIGH COURT OF IRELAND
COMMERCIAL
Record No. 2021/246 C05

IN THE MATTER OF FLUTTER ENTERTAINMENT PLC

AND IN THE MATTER OF THE COMPANIES ACT 2014

AND IN THE MATTER OF A PROPOSED REDUCTION OF CAPITAL PURSUANT TO SECTIONS 84 TO 86 OF THE COMPANIES ACT 2014

NOTICE IS HEREBY GIVEN that an Originating Notice of Motion issued out of the High Court of Ireland (the "Court") on 29 September 2021, seeking the Court's confirmation of the special resolution of Flutter Entertainment plc (the "Company") passed at the annual general meeting of the Company held on 29 April 2021 approving the reduction of the company capital of the Company by the cancellation of the sum of £10,000,000,000 of undenominated capital standing to the credit of the Company's share premium account, or such lesser amount as the Court may determine, is directed to be heard in the Commercial List of the Court, sitting at the Four Courts, Inns Quay, Dublin 7, Ireland at 11:00 a.m. (Irish time) on 3 November 2021 (the "Hearing"). Any creditor or shareholder of the Company wishing to support or oppose the making of any order at the Hearing (an "Interested Party") that wishes to obtain a copy of the Originating Notice of Motion and grounding affidavit should contact the Solicitors for the Company at the address or email addresses below. Any Interested Party may appear at the Hearing personally or be represented by a solicitor or by counsel. Any Interested Party intending to so appear should give notice in writing to the Solicitors for the Company by no later than 5:30 p.m. (Irish time) on 29 October 2021, and any affidavit in support of any such appearance should be filed with the Solicitors for the Company, by no later than 5:30 p.m. (Irish time) on 29 October 2021.

8 October 2021

ARTHUR COX LLP
Solicitors for the Company
10 Earlsfort Terrace
Dublin 2
D02 T380
Ireland
Email: david.voids@arthurcox.com / domhnall.breatnach@arthurcox.com (Ref: DV/DTB)

THE HIGH COURT OF IRELAND
COMMERCIAL
2021 No. 225 C05

IN THE MATTER OF STRONGBRIDGE BIOPHARMA PLC

AND IN THE MATTER OF THE COMPANIES ACT 2014

AND IN THE MATTER OF A PROPOSAL FOR A SCHEME OF ARRANGEMENT PURSUANT TO PART 9, CHAPTER 1 OF THE COMPANIES ACT 2014

AND IN THE MATTER OF THE IRISH TAKEOVER PANEL ACT 1997

NOTICE IS HEREBY GIVEN that an Order of the High Court of Ireland (the "Court") made on 5 October 2021 (the "Order") sanctioning a scheme of arrangement between Strongbridge Biopharma plc (the "Company") and its shareholders (the "Scheme"), and confirming a special resolution approving the reduction of the company capital of the Company by the reduction of the issued capital of the Company by cancelling and extinguishing all the Cancellation Shares (as defined in the Scheme) but without thereby reducing the authorised share capital of the Company, together with the minute approved by the Court, was registered by the Registrar of Companies on 5 October 2021. This notice is given in compliance with the Order.

8 October 2021

ARTHUR COX LLP
Solicitors for the Company
10 Earlsfort Terrace
Dublin 2
D02 T380
Ireland

ROYAL DUTCH SHELL

Company Details Hit From Hurricane Ida

Royal Dutch Shell PLC de-tailed Hurricane Ida's impact to its operations and said it expects a cash boost from high global energy prices in the third quarter.

The Anglo-Dutch energy giant said Hurricane Ida is expected to cause losses of around \$400 million to its adjusted earnings and cash flow from operations in the third quarter.

The hurricane damaged a platform which transfers oil and natural gas from Shell's Mars corridor to onshore terminals. Repairs are expected to keep the platform offline until the end of the year, the company says, which has a knock-on impact to production from the facilities it connects to.

Shell also said it expects its cash flow from Integrated Gas operations will be boosted by "large variation margin inflows on the back of the prevailing gas and electricity price environment."

—Sabela Ojea

meet demand for holiday travel, the Chicago-based airline said Thursday.

In December, United will fly more than 3,500 domestic flights daily, about 91% of its domestic capacity from 2019.

"We're seeing a lot of pent-up demand in our data," United planning executive Ankit Gupta said.

The airline plans to expand flying from the Midwest, adding flights to Las Vegas and Phoenix from Cleveland and a route between Indianapolis and Orlando.

There will also be resumed service to Fort Myers, Fla., from four Midwestern cities, which will include Columbus, Ohio and Milwaukee.

Adding to its ski-destination business, United will introduce flights to Aspen, Colo., from Orange County, Calif.

—Matt Grossman

TILRAY

Loss Widens as Sales Of Cannabis Climb

Tilray Inc. on Thursday posted a wider loss in its latest quarter as cannabis sales improved.

The company reported a loss of \$34.6 million in the fiscal first quarter, compared with \$21.7 million a year earlier. Higher transaction and amortization costs contributed to the wider loss, the company said.

Revenue rose 43% to \$168 million.

Net revenue from cannabis climbed 38% to \$70 million, the company said. Tilray also posted \$15 million in alcohol net sales and \$15 million in revenue from its wellness business.

—Matt Grossman

HELEN OF TROY

Profit Falls but Tops Analyst Expectations

Helen of Troy Ltd. said its profit fell in the fiscal second quarter as sales in its health and home segment declined because of packaging compliance concerns from the U.S. Environmental Protection Agency and related stop-shipment actions.

Shares of the company rose 5.9% Thursday as its results and raised outlook surpassed analyst expectations.

Helen of Troy, which makes household and personal-care products, on Thursday posted earnings of \$513 million in the three months ended Aug. 31, compared with \$87.3 million in the year-ago period.

Revenue fell to \$475.2 million from \$530.9 million, hurt in part by the sale of the North America personal-care business in the quarter, the company said.

Helen of Troy said it booked additional compliance costs of \$3 million in the quarter after it was in discussions with the EPA regarding the compliance of packaging claims on certain products in the air and water filtration categories and some humidifier products that are sold in the U.S.

The company said it largely resolved the matter with changes to product labeling and implemented repackaging plans for the bulk of affected products.

—Dave Sebastian

UNITED AIRLINES HOLDINGS

Carrier to Expand Its Flight Schedule

United Airlines Holdings Inc. will expand its flight schedule closer to pre-pandemic levels to

meet demand for holiday travel, the Chicago-based airline said Thursday.

In December, United will fly more than 3,500 domestic flights daily, about 91% of its domestic capacity from 2019.

"We're seeing a lot of pent-up demand in our data," United planning executive Ankit Gupta said.

The airline plans to expand flying from the Midwest, adding flights to Las Vegas and Phoenix from Cleveland and a route between Indianapolis and Orlando.

There will also be resumed service to Fort Myers, Fla., from four Midwestern cities, which will include Columbus, Ohio and Milwaukee.

Adding to its ski-destination business, United will introduce flights to Aspen, Colo., from Orange County, Calif.

—Matt Grossman

E. JASON WAMBESKIS/INSZUJIA PRESS

United plans to expand capacity to meet demand for holiday travel.

Motus Gets Added Backing

By LAURA COOPER

Workforce expense reimbursement software provider Motus LLC will get an additional private-equity owner as Permira joins longtime investor Thoma Bravo in backing the company.

Motus, which focuses on mobile workforces, has seen an uptick in sales as more people work from home and offices adopt hybrid work models. Although Permira and Thoma Bravo wouldn't disclose a value of the deal, they said that Motus generates annual recurring revenue of more than \$120 million.

Boston-based Motus offers software that helps companies manage expenses around the use of vehicles, mobile devices and computers, as well as reimbursements for outlays tied to remote work, relocation, travel and temporary assignments.

The company was founded in 2004 and serves over 280,000 users for clients including Papa John's International Inc., Coca-Cola Bottling Co., United Airlines Holdings Inc. and Kellogg Co.

Thoma Bravo invested in Motus in 2018, merging it with competitor Runzheimer. Since then, the combined entity has doubled its revenue growth through cross-selling new products and gaining customers, according to A.J. Rohde, a senior partner at Thoma Bravo.

After three years of investment, Thoma decided to find a fellow private-equity partner to help it continue expanding the company, Mr. Rohde said. He added that Thoma Bravo's investment sits in an older fund, and that Motus needed a larger capital base to help it expand organically and through mergers and acquisitions.

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EXHIBIT D

Bernstein Litowitz Berger & Grossmann LLP Announce a Proposed Settlement in the Symantec Corporation Securities Litigation

NEWS PROVIDED BY

Bernstein Litowitz Berger & Grossmann LLP →

Oct 08, 2021, 10:00 ET

NEW YORK, Oct. 8, 2021 /PRNewswire/ --

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SEB INVESTMENT MANAGEMENT AB,
individually and on behalf of all others
similarly situated,
Plaintiffs,
v.
SYMANTEC CORPORATION and
GREGORY S. CLARK,
Defendants.

Case No. 3:18-cv-02902-WHA

ECF CASE

Dept.: Courtroom 12, 19th Floor

Judge: Honorable William Alsup

**SUMMARY NOTICE OF (I) PROPOSED SETTLEMENT
AND PLAN OF ALLOCATION; (II) SETTLEMENT HEARING; AND
(III) MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

To: All persons and entities that, during the period from May 11, 2017 to August 2, 2018, inclusive (the "Class Period"), purchased or otherwise acquired shares of the publicly traded common stock of Symantec Corporation ("Symantec") and were damaged thereby (the "Class").¹

PLEASE READ THIS NOTICE CAREFULLY; YOUR RIGHTS WILL BE AFFECTED BY THE SETTLEMENT OF A CLASS ACTION LAWSUIT PENDING IN THIS COURT.

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Northern District of California, that the Court-appointed Class Representative, SEB Investment Management AB, on behalf of itself and the Court-certified Class, in the above-captioned securities class action (the "Action") has reached a proposed settlement of the Action with defendants Symantec Corporation, now known as NortonLifeLock Inc. ("Symantec") and Gregory S. Clark (collectively, "Defendants") for \$70,000,000 in cash that, if approved, will resolve all claims in the Action.

A hearing will be held on February 10, 2022 at 11:00 a.m. Pacific Time, before the Honorable William Alsup, either in person at the United States District Court for the Northern District of California, San Francisco Courthouse, Courtroom 12 - 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102, or by telephone or videoconference (in the discretion of the Court) to determine: (i) whether the proposed Settlement should be approved as fair, reasonable, and adequate; (ii) whether the Action should be dismissed with prejudice against Defendants, and the releases specified and described in the Stipulation and Agreement of Settlement dated June 8, 2021 should be granted; (iii) whether the proposed Plan of Allocation should be approved as fair and reasonable; and (iv) whether Lead Counsel's application for an award of attorneys' fees and payment of expenses should be approved.

Lead Counsel, which has been prosecuting the Action on a wholly contingent basis, has not received any payment of attorneys' fees for their representation of the Class and have advanced the funds to pay expenses necessarily incurred to prosecute the Action. Lead Counsel will apply to the Court for an award of attorneys' fees in an amount not to exceed 19% of the Settlement Fund, or \$13.3 million, plus interest. In addition, Lead Counsel will apply for payment of Litigation Expenses in connection with the institution, prosecution, and resolution of the Action in an amount not to exceed \$2.5 million. The total Notice and Administration ☞

Costs are estimated to be \$415,000. Any fees and expenses awarded by the Court will be paid from the Settlement Fund. Class Members are not personally liable for any such fees or expenses. If the Court approves Lead Counsel's fee and expense application, and based on the current estimate of Notice and Administration Costs, the portion of the Settlement Fund that will be distributed to Class Members will be approximately \$53,785,000, plus interest accrued.

If you purchased or otherwise acquired Symantec common stock during the Class Period and are a member of the Class, your rights will be affected by the pending Action and the Settlement, and you may be entitled to share in the Net Settlement Fund. If you have not yet received the full printed Notice of (I) Proposed Settlement and Plan of Allocation; (II) Settlement Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses (the "Settlement Notice") and the Claim Form, you may obtain copies of these documents by contacting the Claims Administrator at *Symantec Securities Litigation*, c/o A.B. Data, P.O. Box 173106, Milwaukee, WI 53217, 1-800-949-0206, info@SymantecSecuritiesLitigation.com. Copies of the Settlement Notice and Claim Form can also be downloaded from the website for the Action, www.SymantecSecuritiesLitigation.com.

If you are a Class Member, in order to be eligible to receive a payment under the proposed Settlement, you must submit a Claim Form **online or postmarked no later 28 days after the Court approves the Settlement. The deadline may be as early as March 10, 2022.** The Settlement website, www.SymantecSecuritiesLitigation.com, will be updated to inform Class Members of the approval of the Settlement, if and when that occurs. If you are a Class Member and do not submit a proper Claim Form, you will not be eligible to share in the distribution of the net proceeds of the Settlement but you will nevertheless be bound by any judgments or orders entered by the Court in the Action.

If you are a member of the Class and wish to exclude yourself from the Class, you must submit a request for exclusion such that it is **received no later than January 13, 2022 at midnight**, in accordance with the instructions set forth in the Notice. If you properly exclude yourself from the Class, you will not be bound by any judgments or orders entered by the Court in the Action and you will not be eligible to share in the proceeds of the Settlement or object to the Settlement.

Any objections to the proposed Settlement, the proposed Plan of Allocation, and/or Class Counsel's application for attorneys' fees and payment of expenses, must be filed with the Court and delivered to Class Counsel and counsel for Defendants such that they are **received no later than January 13, 2022 at midnight**, in accordance with the instructions set forth in the Settlement Notice.

Please do not contact the Court, the Clerk's office, Symantec, any other Defendants in the Action, or their counsel regarding this notice. All questions about this notice, the proposed Settlement, or your eligibility to participate in the Settlement should be directed the Claims Administrator or Class Counsel.

Requests for the Settlement Notice and Claim Form should be made to:

Symantec Securities Litigation
c/o A.B. Data, Ltd.
P.O. Box 173106
Milwaukee, WI 53217
1-800-949-0206
info@SymantecSecuritiesLitigation.com
www.SymantecSecuritiesLitigation.com

Inquiries, other than requests for the Settlement Notice and Claim Form, may be made to Class Counsel:

Bernstein Litowitz Berger & Grossmann LLP

Jeremy P. Robinson, Esq.
1251 Avenue of the Americas
New York, NY 10020
1-800-380-8496
settlements@blbglaw.com

By Order of the Court

Bernstein Litowitz Berger & Grossmann LLP

¹ Certain persons and entities are excluded from the Class by definition and others are excluded pursuant to request. The full definition of the Class including a complete description of who is excluded from the Class is set forth in the full Settlement Notice referred to below.

SOURCE Bernstein Litowitz Berger & Grossmann LLP

Exhibit 3

EXHIBIT 3

SEB Inv. Mgmt. AB v. Symantec Corp.,
Case No. 3:18-cv-02902-WHA

SUMMARY OF LEAD COUNSEL'S HOURS AND LODESTAR

Inception through June 8, 2021

NAME	HOURS	HOURLY RATE	LODESTAR
Partners			
Max Berger	83.75	\$1,300	\$108,875.00
Rebecca Boon	1,048.25	\$875	\$917,218.75
Salvatore Graziano	279.00	\$1,150	\$320,850.00
Jeremy P. Robinson	2,443.75	\$900	\$2,199,375.00
David Stickney	164.50	\$975	\$160,387.50
Senior Counsel			
David L. Duncan	64.25	\$775	\$49,793.75
Lucas Gilmore	427.50	\$775	\$331,312.50
Richard Gluck	922.50	\$800	\$738,000.00
Associates			
Lauren Cruz	44.00	\$550	\$24,200.00
Ryan Dykhous	1,374.25	\$425	\$584,056.25
Jacob Spaid	360.50	\$475	\$171,237.50
Julia Tebor	425.25	\$575	\$244,518.75
Senior Staff Attorneys			
Andrew Boruch	725.75	\$425	\$308,443.75
Ryan Candee	910.50	\$425	\$386,962.50
Brian Chau	2,250.00	\$425	\$956,250.00
Lawrence Hosmer	1,028.00	\$425	\$436,900.00
Stephen Imundo	2,931.25	\$425	\$1,245,781.25
Staff Attorneys			
Lauren Cormier	1,972.25	\$375	\$739,593.75
Igor Faynshteyn	1,551.50	\$375	\$581,812.50
Helen Fikrey	2,285.25	\$400	\$914,100.00
Colette Foster	2,077.00	\$400	\$830,800.00
Addison F. Golladay	2,066.50	\$400	\$826,600.00
Ibrahim Hamed	1,292.00	\$400	\$516,800.00
Monique Hardial	1,274.50	\$375	\$477,937.50
Jed Koslow	1,943.75	\$400	\$777,500.00

NAME	HOURS	HOURLY RATE	LODESTAR
Erick Ladson	2,326.75	\$400	\$930,700.00
Juan Lossada	1,738.75	\$400	\$695,500.00
Ryan McCurdy	491.75	\$400	\$196,700.00
Ingvar Olsson	1,753.00	\$400	\$701,200.00
William Pham	1,556.25	\$375	\$583,593.75
Esinam Quarco	1,430.50	\$400	\$572,200.00
Justin Ratliff	1,110.50	\$350	\$388,675.00
Daniel Renehan	243.50	\$400	\$97,400.00
Lewis Smith	50.75	\$400	\$20,300.00
Investigators			
Amy Bitkower	214.00	\$575	\$123,050.00
Jacob Foster	235.50	\$300	\$70,650.00
Joelle Landino	556.75	\$425	\$236,618.75
Andrew Thompson	97.50	\$400	\$39,000.00
Case Managers & Paralegals			
Dena Bielasz	120.75	\$335	\$40,451.25
Jose Echegaray	731.50	\$350	\$256,025.00
Michelle Leung	154.00	\$350	\$53,900.00
Preya Rodriguez	237.25	\$325	\$77,106.25
Litigation Support			
Johanna Pitcairn	152.25	\$400	\$60,900.00
Managing Clerk			
Mahiri Buffong	93.00	\$375	\$34,875.00
TOTALS	43,240.00		\$20,028,151.25

Exhibit 4

EXHIBIT 4

SEB Inv. Mgmt. AB v. Symantec Corp.,
Case No. 3:18-cv-02902-WHA

**SUMMARY OF LEAD COUNSEL'S HOURS AND LODESTAR
REMOVED FROM FEE APPLICATION IN THE INTEREST OF BILLING JUDGMENT**

Inception through June 8, 2021

NAME	HOURS	HOURLY RATE	LODESTAR
Partners			
Max Berger	9.00	\$1,300	\$11,700.00
Michael Blatchley	332.25	\$900	\$299,025.00
Rebecca Boon	353.50	\$875	\$309,312.50
Scott Foglietta	13.00	\$825	\$10,725.00
Ben Galdston	1.50	\$800	\$1,200.00
Salvatore Graziano	195.75	\$1,150	\$225,112.50
Avi Josefson	6.00	\$1,000	\$6,000.00
Jeremy P. Robinson	177.50	\$900	\$159,750.00
Hannah Ross	2.00	\$1,050	\$2,100.00
Gerald Silk	63.50	\$1,150	\$73,025.00
David Stickney	34.25	\$975	\$33,393.75
Jonathan Uslaner	182.75	\$900	\$164,475.00
Jeroen Van Kwawegen	92.00	\$1,050	\$96,600.00
Greg Varallo	2.00	\$1,050	\$2,100.00
Senior Counsel			
David L. Duncan	28.00	\$775	\$21,700.00
Lucas Gilmore	71.50	\$775	\$55,412.50
Richard Gluck	6.75	\$800	\$5,400.00
Brandon Marsh	5.25	\$775	\$4,068.75
John Mills	14.00	\$775	\$10,850.00
Associates			
Ryan Dykhous	59.50	\$425	\$25,287.50
Ross Shikowitz	374.50	\$600	\$224,700.00
Jacob Spaid	1.50	\$475	\$712.50
Catherine van Kampen	5.00	\$700	\$3,500.00
Senior Staff Attorneys			
Andrew Boruch	16.50	\$425	\$7,012.50
Ryan Candee	50.75	\$425	\$21,568.75
Brian Chau	24.00	\$425	\$10,200.00

NAME	HOURS	HOURLY RATE	LODESTAR
Lawrence Hosmer	21.00	\$425	\$8,925.00
Stephen Imundo	40.00	\$425	\$17,000.00
Staff Attorneys			
Lauren Cormier	32.00	\$375	\$12,000.00
Igor Faynshteyn	76.50	\$375	\$28,687.50
Helen Fikrey	204.50	\$400	\$81,800.00
Colette Foster	176.00	\$400	\$70,400.00
Addison F. Golladay	28.00	\$400	\$11,200.00
Ibrahim Hamed	26.00	\$400	\$10,400.00
Monique Hardial	16.00	\$375	\$6,000.00
Jed Koslow	42.50	\$400	\$17,000.00
Erick Ladson	179.00	\$400	\$71,600.00
Juan Lossada	45.00	\$400	\$18,000.00
Ryan McCurdy	22.00	\$400	\$8,800.00
Ingvar Olsson	10.25	\$400	\$4,100.00
William Pham	82.50	\$375	\$30,937.50
Esinam Quarco	40.00	\$400	\$16,000.00
Justin Ratliff	50.00	\$350	\$17,500.00
Lewis Smith	112.75	\$400	\$45,100.00
Investigators			
Robin Barnier	14.00	\$300	\$4,200.00
Amy Bitkower	8.25	\$575	\$4,743.75
Jacob Foster	4.00	\$300	\$1,200.00
Jenna Goldin	17.00	\$400	\$6,800.00
Financial Analysts			
Vincent Alfano	26.25	\$350	\$9,187.50
Sam Jones	119.75	\$350	\$41,912.50
Matthew McGlade	14.75	\$400	\$5,900.00
Sharon Safran	6.50	\$335	\$2,177.50
Tanjila Sultana	1.00	\$425	\$425.00
Adam Weinschel	47.50	\$550	\$26,125.00
Case Managers & Paralegals			
Jessie Axman	61.50	\$255	\$15,682.50
Yvette Badillo	20.00	\$300	\$6,000.00
Dena Bielasz	71.00	\$335	\$23,785.00
Kenneth Cardwell	0.75	\$350	\$262.50
Jessica Cuccurullo	9.25	\$300	\$2,775.00
Khristine De Leon	31.75	\$325	\$10,318.75

NAME	HOURS	HOURLY RATE	LODESTAR
Nathan Donlon	2.75	\$335	\$921.25
Jose Echegaray	221.50	\$350	\$77,525.00
Matthew Gluck	2.00	\$350	\$700.00
Janielle Lattimore	47.00	\$350	\$16,450.00
Ashley Lee	40.00	\$300	\$12,000.00
Michelle Leung	40.50	\$350	\$14,175.00
Matthew Mahady	97.25	\$350	\$34,037.50
Kaye A. Martin	7.25	\$335	\$2,428.75
Matthew Molloy	4.25	\$325	\$1,381.25
Desiree Morris	5.00	\$350	\$1,750.00
Lisa Napoleon	33.75	\$300	\$10,125.00
Preya Rodriguez	39.75	\$325	\$12,918.75
Virgilio Soler	11.75	\$350	\$4,112.50
Gary Weston	24.25	\$375	\$9,093.75
Melody Yaghoubzadeh	5.50	\$350	\$1,925.00
Stephanie Yu	7.00	\$325	\$2,275.00
Litigation Support			
Paul Charlotin	3.00	\$350	\$1,050.00
Johanna Pitcairn	101.00	\$400	\$40,400.00
Roberto Santamarina	49.00	\$400	\$19,600.00
Managing Clerk			
Mahiri Buffong	63.50	\$375	\$23,812.50
Errol Hall	12.25	\$310	\$3,797.50
Kevin Kazules	10.75	\$200	\$2,150.00
Marketing			
Alexander Coxe	3.50	\$325	\$1,137.50
Dalia El-Newehy	4.25	\$250	\$1,062.50
TOTALS	4,616.25		\$2,716,705.00

Exhibit 5

EXHIBIT 5

SEB Inv. Mgmt. AB v. Symantec Corp.,
Case No. 3:18-cv-02902-WHA

QUALIFICATIONS, ROLE AND RATE INFORMATION FOR LEAD COUNSEL'S ATTORNEYS AND PROFESSIONAL STAFF

PARTNERS

Max W. Berger, Senior Partner

Qualifications & Experience: Mr. Berger is the Founding Partner and an Executive Committee Member of BLB&G and has grown BLB&G from a partnership of four lawyers in 1983 into what the *Financial Times* described as “one of the most powerful securities class action law firms in the United States” by prosecuting seminal cases which have increased market transparency, held wrongdoers accountable, and improved corporate business practices in groundbreaking ways.

Described by sources quoted in leading industry publication *Chambers USA* as “the smartest, most strategic plaintiffs' lawyer [they have] ever encountered,” Mr. Berger has litigated many of the firm's most high-profile and significant cases and secured some of the largest recoveries ever achieved in securities fraud lawsuits, negotiating seven of the largest securities fraud settlements in history, each in excess of a billion dollars: *Cendant* (\$3.3 billion), *Citigroup-WorldCom* (\$2.575 billion), *Bank of America/Merrill Lynch* (\$2.4 billion), *JPMorgan Chase-WorldCom* (\$2 billion), *Nortel* (\$1.07 billion), *Merck* (\$1.06 billion), and *McKesson* (\$1.05 billion). Mr. Berger's prosecution of the *WorldCom* litigation, which resulted in unprecedented monetary contributions from WorldCom's outside directors (nearly \$25 million out of their own pockets on top of their insurance coverage) “shook Wall Street, the audit profession and corporate boardrooms.” (*The Wall Street Journal*).

Mr. Berger's cases have resulted in sweeping corporate governance overhauls, including the creation of an independent task force to oversee and monitor diversity practices (*Texaco* discrimination litigation), establishing an industry-accepted definition of director independence, increasing a board's power and responsibility to oversee internal controls and financial reporting (*Columbia/HCA*), and creating a Healthcare Law Regulatory Committee with dedicated funding to improve the standard for regulatory compliance oversight by a public company board of directors (*Pfizer*). His cases have yielded results which have served as models for public companies going forward.

Most recently, before the #metoo movement came alive, on behalf of an institutional investor client, Mr. Berger handled the prosecution of an unprecedented shareholder derivative litigation against Fox News parent 21st Century Fox, Inc. arising from the systemic sexual and workplace harassment at the embattled network. After nearly 18 months of litigation, discovery, and negotiation related to the shocking misconduct and the Board's extensive alleged governance failures, the parties unveiled a landmark settlement with two key components: 1) the first ever

Board-level watchdog of its kind—the "Fox News Workplace Professionalism and Inclusion Council" of experts (WPIC)—majority independent of the Murdochs, the Company and Board; and 2) one of the largest financial recoveries—\$90 million—ever obtained in a pure corporate board oversight dispute. The WPIC is expected to serve as a model for public companies in all industries.

Mr. Berger's work has garnered him extensive media attention, and he has been the subject of feature articles in a variety of major media publications. *The New York Times* highlighted his remarkable track record in an October 2012 profile entitled "Investors' Billion-Dollar Fraud Fighter," which also discussed his role in the Bank of America/Merrill Lynch Merger litigation. In 2011, Mr. Berger was twice profiled by *The American Lawyer* for his role in negotiating a \$627 million recovery on behalf of investors in the *In re Wachovia Corp. Securities Litigation*, and a \$516 million recovery in *In re Lehman Brothers Equity/Debt Securities Litigation*. For his outstanding efforts on behalf of WorldCom investors, he was featured in articles in *BusinessWeek* and *The American Lawyer*, and *The National Law Journal* profiled Max (one of only eleven attorneys selected nationwide) in its annual 2005 "Winning Attorneys" section. He was subsequently featured in a 2006 *New York Times* article, "A Class-Action Shuffle," which assessed the evolving landscape of the securities litigation arena.

Widely recognized as the "Dean" of the U.S. plaintiff securities bar for his remarkable career and his professional excellence, Mr. Berger has a distinguished and unparalleled list of honors to his name.

He was selected as one of the "100 Most Influential Lawyers in America" by *The National Law Journal* for being "front and center" in holding Wall Street banks accountable and obtaining over \$5 billion in cases arising from the subprime meltdown, and for his work as a "master negotiator" in obtaining numerous multi-billion dollar recoveries for investors.

Described as a "standard-bearer" for the profession in a career spanning nearly 50 years, he is the recipient of *Chambers USA's* award for Outstanding Contribution to the Legal Profession. In presenting this prestigious honor, *Chambers* recognized Mr. Berger's "numerous headline-grabbing successes," as well as his unique stature among colleagues—"warmly lauded by his peers, who are nevertheless loath to find him on the other side of the table." Mr. Berger has been recognized as a litigation "star" and leading lawyer in his field by *Chambers* since its inception.

Benchmark Litigation recently inducted him into its exclusive "Hall of Fame" and named him a 2021 "Litigation Star" in recognition of his career achievements and impact on the field of securities litigation.

Upon its tenth anniversary, *Lawdragon* named Mr. Berger a "Lawdragon Legend" for his accomplishments. He was recently inducted into *Lawdragon's* "Hall of Fame." He is regularly included in the publication's "500 Leading Lawyers in America" and "100 Securities Litigators You Need to Know" lists.

Law360 published a special feature discussing his life and career as a “Titan of the Plaintiffs Bar,” named him one of only six litigators selected nationally as a “Legal MVP,” and selected him as one of “10 Legal Superstars” nationally for his work in securities litigation.

Mr. Berger has been regularly named a "leading lawyer" in the *Legal 500 US Guide* where he was also named to their "Hall of Fame" list, as well as *The Best Lawyers in America*® guide.

Mr. Berger was honored for his outstanding contribution to the public interest by Trial Lawyers for Public Justice, which named him a "Trial Lawyer of the Year" Finalist in 1997 for his work in *Roberts, et al. v. Texaco*, the celebrated race discrimination case, on behalf of Texaco's African-American employees.

Mr. Berger has lectured extensively for many professional organizations, and is the author and co-author of numerous articles on developments in the securities laws and their implications for public policy. He was chosen, along with several of his BLB&G partners, to author the first chapter—“Plaintiffs’ Perspective”—of Lexis/Nexis’s seminal industry guide *Litigating Securities Class Actions*. An esteemed voice on all sides of the legal and financial markets, in 2008 the SEC and Treasury called on Mr. Berger to provide guidance on regulatory changes being considered as the accounting profession was experiencing tectonic shifts shortly before the financial crisis.

Mr. Berger also serves the academic community in numerous capacities. A long-time member of the Board of Trustees of Baruch College, he served as the President of the Baruch College Fund from 2015-2019 and now serves as its Chairman. In May 2006, he was presented with the Distinguished Alumnus Award for his contributions to Baruch College, and in 2019, was awarded an honorary Doctor of Laws degree at Baruch’s commencement, the highest honor Baruch College confers upon an individual for non-academic achievement. The award recognized his decades-long dedication to the mission and vision of the College, and in bestowing it, Baruch described Mr. Berger as “one of the most influential individuals in the history of Baruch College.”

A member of the Dean's Council to Columbia Law School as well as the Columbia Law School Public Interest/Public Service Council, Mr. Berger has taught Profession of Law, an ethics course at Columbia Law School, and serves on the Advisory Board of Columbia Law School's Center on Corporate Governance. In February 2011, Mr. Berger received Columbia Law School's most prestigious and highest honor, "The Medal for Excellence." This award is presented annually to Columbia Law School alumni who exemplify the qualities of character, intellect, and social and professional responsibility that the Law School seeks to instill in its students. As a recipient of this award, Mr. Berger was profiled in the Fall 2011 issue of *Columbia Law School Magazine*. He is a member of the American Law Institute and an Advisor to its Restatement Third: Economic Torts project.

Among numerous charitable and volunteer works, Mr. Berger is a significant and long-time contributor to Her Justice, a non-profit organization in New York City dedicated to providing *pro bono* legal representation to indigent women, principally survivors of intimate partner violence, in connection with the many legal problems they face. In recognition of their personal support of the organization, Max and his wife, Dale Berger, were awarded the "Above and Beyond Commitment to Justice Award" by Her Justice in 2021 for being steadfast advocates for women living in poverty.

in New York City. In addition to his personal support of Her Justice, Mr. Berger has ensured BLB&G's long-time involvement with the organization. He is also an active supporter of City Year New York, a division of AmeriCorps, dedicated to encouraging young people to devote time to public service. In July 2005, he was named City Year New York's "Idealist of the Year," for his commitment to, service for, and work in the community. A celebrated photographer, Mr. Berger has held two successful photography shows that raised hundreds of thousands of dollars for City Year and Her Justice. He and his wife, Dale, have also established the Dale and Max Berger Public Interest Law Fellowship at Columbia Law School and the Max Berger Pre-Law Program at Baruch College.

Education: Columbia Law School, J.D., 1971, Editor of the *Columbia Survey of Human Rights Law*; Baruch College-City University of New York, B.B.A., Accounting, 1968.

Admissions: New York; United States District Court for the Eastern District of New York; United States District Court for the Southern District of New York; United States Court of Appeals for the Second Circuit; United States Court of Appeals for the Third Circuit; United States Court of Appeals for the Sixth Circuit; Supreme Court of the United States.

Role in Symantec Litigation: Mr. Berger provided high-level strategic advice throughout the case, especially concerning settlement matters, and he was one of the principal attorneys handling settlement negotiations with Defendants that resulted in the proposed Settlement. As noted in the Robinson Declaration, Mr. Berger's time spent during the two settlement conferences and the ensuing negotiations is not included in Lead Counsel's lodestar calculation.

Rate Information: Mr. Berger's hourly rate is \$1,300. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Berger's rate is comparable to the prevailing rates for senior partners with similar experience and qualifications at other Plaintiffs' firms. Based on the same analysis and publicly available information, Mr. Berger's hourly rate is lower than the publicly available rates of senior partners at large defense firms against whom Lead Counsel routinely litigates in complex securities class actions like this one.

Rebecca Boon, Partner

Qualifications & Experience: Ms. Boon has been litigating securities fraud and shareholder rights actions for over a decade, recovering more than \$1.5 billion for the firm's institutional investor clients. Her work at the firm expands beyond litigation. Ms. Boon has advanced equality in the workplace by co-founding the Beyond #MeToo working group and leading landmark recoveries that have resulted in hundreds of millions of dollars back to investors and important social change among industries.

Most recently, under the dual pressures of the Covid-19 pandemic and the fast-paced Eastern District of Virginia docket, Ms. Boon led the trial team that recovered \$90 million for investors in *Willis Towers Watson* in direct and related shareholder derivative litigation arising from the merger

of Towers and Willis. Beyond the significant financial recovery, this case was particularly significant because BLB&G obtained decisions from both the Fourth Circuit Court of Appeals and the District Court that created highly favorable law for pleading claims under Section 14(a) of the Exchange Act.

Ms. Boon also led the trial team that recovered \$240 million for investors in *Signet*, the first successful resolution of a securities fraud class action based on allegations of sexual harassment. In this case both the class certification decision and the Judge's decision that the Company's statements about gender equality and sexual harassment could be actionable in a securities class action are landmark decisions that exceed even the significant financial recovery achieved for shareholders.

Among numerous other of her notable recoveries, Ms. Boon was a senior member of the team that obtained \$480 million for investors in the securities class action against Wells Fargo & Co. related to its fake accounts scandal, one of the largest settlements in Ninth Circuit history. She also represented the New York State Teachers' Retirement System in a securities litigation against the General Motors Company arising from a series of misrepresentations concerning the quality, safety, and reliability of the Company's cars, which resulted in a \$300 million settlement—the second largest securities class action recovery in the Sixth Circuit.

Ms. Boon was also a senior member of the trial team that prosecuted an unprecedented shareholder derivative litigation against Fox News parent 21st Century Fox, Inc. arising from the systemic sexual and workplace harassment at the embattled network. After nearly 18 months of litigation, the team obtained a landmark settlement in 2018 with two key components: 1) the first ever Board-level watchdog of its kind—the “Fox News Workplace Professionalism and Inclusion Council” of experts—majority independent of the Murdochs, the Company, and Board; and 2) one of the largest financial recoveries—\$90 million—ever obtained in a pure corporate board oversight dispute. Because of her work on the case, Rebecca subsequently narrated a feature documentary by Dow Jones' *MarketWatch* discussing both the Fox litigation and the ways that investors can harness their power to create meaningful social change through shareholder litigation.

Ms. Boon regularly lectures at law schools, universities and conferences in the U.S. and abroad on the topics of social change, sexual harassment, and shareholder litigation. She is a founding member and the chairperson of Beyond #MeToo: A Working Group on Corporate Governance, Compliance, and Risk. Comprised of diversity-inclusion experts, litigators, and academics, B#MT is dedicated to understanding the root causes of workplace harassment, discrimination, and misconduct and making corporate America a better and more inclusive place for all of us to work.

Ms. Boon co-leads BLB&G's Women's Committee and is active in BLBG's Women's Forum. She is also a member of the firm's Diversity Committee. In addition, Rebecca sits on the board of The Feminist Institute, a not-for-profit organization dedicated to collecting, digitizing and sharing feminist history.

In recognition of her achievements, Ms. Boon has been named a "Rising Star" by Law360, a "Rising Star of the Plaintiffs Bar" by The National Law Journal, a "Young Lawyer of the Year" by The American Lawyer, and is included in both the Super Lawyers publication of leading

practitioners by Thomson Reuters as a "Rising Star" and the "500 Leading Plaintiff Financial Lawyer" list by Lawdragon. Rebecca was also named to Benchmark Litigation's "40 and Under Hot List" for 2021 and 2020.

Education: Hofstra University School of Law, J.D., 2007, Charles H. Revson Foundation Law Students Public Interest Fellow; Hofstra Law Review; Distinguished Contribution to the School Award; Merit Scholarship; Vassar College, B.A., 2004, Social Justice Community Fellow.

Admissions: New York; United States District Court for the Southern District of New York; United States Bankruptcy Court for the Southern District of New York; United States District Court for the Eastern District of Michigan; United States Court of Appeals for the Second Circuit; United States Court of Appeals for the Fourth Circuit; United States Court of Appeals for the Sixth Circuit; United States Court of Appeals for the Ninth Circuit.

Role in Symantec Litigation: Ms. Boon was heavily involved in many aspects of the case, including, in particular, the pleading and discovery phases of the litigation. Among other things, she actively participated in the drafting and review of the initial complaint, including by interviewing multiple former Symantec employees, the opposition to motion to dismiss, the motion to dismiss hearing, the efforts to unseal documents in the related derivative action, the preparation of the amended complaint, including interviewing additional former employees, the motion for leave to file the amended complaint, and the motion for class certification. Ms. Boon also was heavily involved in class certification and fact discovery, including preparing Lead Plaintiff for its deposition, reviewing documents, negotiating discovery with Defendants and third parties and she took two depositions. She also participated in both settlement conferences before Judge Ryu.

Rate Information: Ms. Boon's hourly rate is \$875. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Ms. Boon's rate is comparable to prevailing rates for litigation partners with her experience and qualifications. Based on the same analysis and publicly available information, Ms. Boon's rate is lower than the publicly available rates of litigation partners with similar experience at the large defense firms against whom Lead Counsel routinely litigates in complex securities class actions like this one.

Salvatore J. Graziano, Senior Partner

Qualifications & Experience: Mr. Graziano is widely recognized as one of the top securities litigators in the country. He has served as lead trial counsel in a wide variety of major securities fraud class actions, recovering billions of dollars on behalf of institutional investors and hedge fund clients.

Over the course of his distinguished career, Mr. Graziano has successfully litigated many high-profile cases, including: *Merck & Co., Inc. (Vioxx) Sec. Litig.* (D.N.J.); *In re Schering-Plough Corp./ENHANCE Sec. Litig.* (D.N.J.); *New York State Teachers' Retirement System v. General Motors Co.* (E.D. Mich.); *In re MF Global Holdings Limited Sec. Litig.* (S.D.N.Y.); *In re Raytheon Sec. Litig.* (D. Mass.); *In re Refco Sec. Litig.* (S.D.N.Y.); *In re MicroStrategy, Inc. Sec. Litig.* (E.D.

Va.); *In re Bristol Myers Squibb Co. Sec. Litig.* (S.D.N.Y.); and *In re New Century Sec. Litig.* (C.D. Cal.).

Industry observers, peers and adversaries routinely honor Mr. Graziano for his accomplishments. He is one of the “Top 100 Trial Lawyers” in the nation and a “Litigation Star” according to *Benchmark Litigation*, which credits him for performing “top quality work.” *Chambers USA* describes Mr. Graziano as “wonderfully talented...a smart, aggressive lawyer who works hard for his clients,” and “the go-to for the biggest cases,” while *Legal 500* praises him as a “highly effective litigator.” Heralded multiple times as one of a handful of Securities Litigation and Class Action “MVPs” in the nation by *Law360*, he has also been named a “Litigation Trailblazer” by *The National Law Journal*. Mr. Graziano is also one of *Lawdragon’s* “500 Leading Lawyers in America,” named as a leading mass tort and plaintiff class action litigator by Best Lawyers®, and is one of Thomson Reuters’ *Super Lawyers*.

A highly esteemed voice on investor rights, regulatory and market issues, in 2008, Mr. Graziano was called upon by the Securities and Exchange Commission's Advisory Committee on Improvements to Financial Reporting to give testimony as to the state of the industry and potential impacts of proposed regulatory changes being considered. He is the author and co-author of numerous articles on developments in the securities laws, and was chosen, along with several of his BLB&G partners, to author the first chapter - “Plaintiffs’ Perspective” - of Lexis/Nexis’s seminal industry guide *Litigating Securities Class Actions*.

A member of the firm's Executive Committee, Mr. Graziano has previously served as the President of the National Association of Shareholder & Consumer Attorneys, and has served as a member of the Financial Reporting Committee and the Securities Regulation Committee of the Association of the Bar of the City of New York. He regularly speaks on securities fraud litigation and shareholder rights, and has guest lectured at Columbia Law School on the topic.

Prior to entering private practice, Mr. Graziano served as an Assistant District Attorney in the Manhattan District Attorney's Office.

Education: New York University School of Law, J.D., 1991; New York University - The College of Arts and Science, B.A., Psychology, 1988.

Admissions: New York; United States District Court for the Southern District of New York; United States District Court for the Eastern District of New York; United States District Court for the Eastern District of Michigan; United States Court of Appeals for the First Circuit; United States Court of Appeals for the Second Circuit; United States Court of Appeals for the Third Circuit; United States Court of Appeals for the Fourth Circuit; United States Court of Appeals for the Sixth Circuit; United States Court of Appeals for the Ninth Circuit; United States Court of Appeals for the Eleventh Circuit.

Role in Symantec Litigation: Mr. Graziano oversaw Lead Counsel’s litigation effort, providing strategic advice throughout the case, especially concerning litigation matters, and reviewing all materials filed with the Court, including Lead Plaintiff’s amended complaint, class certification motion and all other motions as well as Lead Plaintiff’s opposition to Defendants’ motion for

summary judgment. In addition, Mr. Graziano argued Lead Plaintiff's successful motion for leave to amend the complaint in September 2019, after the initial complaint was dismissed. Mr. Graziano was also involved in all settlement strategy sessions and participated in both settlement conferences.

Rate Information: Mr. Graziano's hourly rate is \$1,150. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Graziano's rate is comparable to the prevailing rates for senior partners with similar experience and qualifications at other Plaintiffs' firms. Based on the same analysis and publicly available information, Mr. Graziano's hourly rate is lower than the publicly available rates of senior partners at large defense firms against whom Lead Counsel routinely litigates in complex securities class actions like this one.

Jeremy P. Robinson, Partner

Qualifications & Experience: Mr. Robinson has extensive experience in securities and civil litigation. Since joining BLB&G, he has been involved in prosecuting many high-profile securities cases.

For example, Mr. Robinson was an integral member of the teams that prosecuted *In re Refco Securities Litigation* (total recoveries in excess of \$425 million); *In re WellCare Health Plans, Inc. Securities Litigation* (\$200 million settlement, representing the second largest settlement of a securities case in Eleventh Circuit history); and *In re Citigroup, Inc. Bond Action Litigation*, which settled for \$730 million, representing the second largest recovery ever in a securities class action brought on behalf of purchasers of debt securities and ranking among the fifteen largest recoveries in the history of securities class actions. He also recently represented investors in *In re Bank of New York Mellon Corp. Forex Transactions Litigation*, which settled for \$180 million, *In re Freeport-McMoRan Derivative Litigation*, which settled for a cash recovery of nearly \$154 million, plus corporate governance reforms, and *In re Allergan Proxy Violation Securities Litigation*, which settled on the eve of trial for \$250 million. The cases that Jeremy is presently prosecuting include *In re Symantec Securities Litigation*, *Lord Abbett Affiliated Funds Inc. v. Navient Corporation et al.*, and *In re Facebook Securities Litigation*.

In 2000-01, Mr. Robinson received the Harold G. Fox Scholarship and spent a year working with barristers and judges in London, England. In 2005, Mr. Robinson obtained his Master of Laws degree from Columbia Law School, where he was honored as a Harlan Fiske Stone Scholar. He has also repeatedly been recognized as a leading practitioner by *Lawdragon*, Thomson Reuters' *Super Lawyers*, and was recently named a "Litigation Star" by *Benchmark Litigation*.

Education: Columbia Law School, LL.M., Harlan Fiske Stone Scholar; Queen's University - Faculty of Law, LL.B. (JD.), Best Brief in the Niagara International Moot Court Competition; David Sabbath Prizes in Contract Law and in Wills & Trusts Law.

Admissions: New York; Ontario, Canada (inactive); United States District Court for the Southern District of New York; United States District Court for the Eastern District of Michigan.

Role in Symantec Litigation: After the motion to dismiss was argued in January 2019 and David Stickney retired from the firm (see below), Mr. Robinson assumed responsibility for the day-to-day management of the *Symantec* litigation. After he joined the team, Mr. Robinson drafted and/or supervised the drafting of virtually all pleadings and Court submissions, including the motion to unseal documents in the related derivative action, the amended complaint, the motion for leave to file the amended complaint; the successful motion to compel Defendants to produce documents they produced to the SEC (which Mr. Robinson argued at the May 27, 2020 hearing), Lead Plaintiffs' motion for class certification, and Lead Plaintiff's opposition to Defendants' summary judgment motion and supporting submissions. Mr. Robinson also led Lead Counsel's massive discovery effort, negotiating the scope of discovery with Defendants and third parties, analyzing and planning the discovery sought to establish Lead Plaintiff's claims, including the selection of deposition witnesses, and reviewing and analyzing the documents produced by Defendants and third parties. In connection with his supervision of the discovery effort, Mr. Robinson personally took 9 depositions of key fact witnesses, including for example Defendant Clark (former CEO), both FE1 and FE2, and Symantec's former Chief Accounting Officer. He also worked extensively with Lead Plaintiff's experts and personally took or defended 3 expert depositions. Mr. Robinson also actively participated in both settlement conferences (and the related negotiations) and was the principal drafter of the multiple settlement conference submissions and actively participated in the negotiation and finalization of the settlement documentation, including the term sheet and the Stipulation of Settlement.

Rate Information: Mr. Robinson's hourly rate is \$900. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Robinson's rate is comparable to prevailing rates for litigation partners with his experience and qualifications. Based on the same analysis and publicly available information, Mr. Robinson's hourly rate is lower than the publicly available rates of litigation partners at the large defense firms against whom Lead Counsel routinely litigates in complex securities class actions like this one.

David R. Stickney, Former Partner

Qualifications & Experience: Prior to his retirement from BLB&G in early 2019, Mr. Stickney practiced in the firm's California office, where he focused on complex litigation in state and federal courts nationwide at both the trial court and appellate levels. He represented institutions and individuals in high-profile and historic cases, litigating virtually every type of securities matter, including claims under the Securities and Exchange Acts of 1933 and 1934, fraud and non-disclosure cases under state blue-sky laws and myriad additional actions addressing securities-related misconduct.

Mr. Stickney prosecuted and, together with his partners, successfully resolved a number of the firm's significant cases, obtaining billions of dollars in recoveries for investors. Among such cases are *In re McKesson Sec. Litig.*, recovering \$1.023 billion, the largest settlement in history for any

securities class action within the Ninth Circuit; *In re Lehman Brothers Debt/Equity Sec. Litig.*, which settled for \$615 million; *In re Bear Stearns Mortgage Pass-Through Certificate Litigation*, recovering \$500 million; *Plaintiff vs. Wall Street Banks*, recovering \$382 million; *Public Employees Ret. Sys. of Miss. vs. Merrill Lynch & Co.*, recovering \$325 million; *Wyatt v. El Paso Corp.*, which settled for \$285 million; *Public Employees Ret. Sys. of Miss. vs. JP Morgan*, which settled for \$280 million; *In re Genworth Fin. Inc., Sec. Litig.*, which settled for \$219 million; *BFA Liquidation Trust v. Arthur Andersen LLP*, which settled during trial for \$217 million; *In re Wells Fargo Mortgage Pass-Through Certificate Litig.*, which settled for \$125 million; *Public Employees Ret. Sys. of Miss. vs. Morgan Stanley*, which settled for \$95 million; *In re Lumber Liquidators Sec. Litig.*; *In re CTI Biopharmaceuticals Sec. Litig.*; *In re Rayonier Sec. Litig.*; *In re SunPower Corp.*; *Atlas v. Accredited Home Lenders Holding Company*; *In re Connetics Inc.*; *In re Stone Energy Corp.*; *In re WSB Financial Group Sec. Litig.*; *In re Dura Pharmaceuticals Inc. Sec. Litig.*; *In re EMAC Sec. Litig.*, and additional cases.

Mr. Stickney prosecuted claims arising from a wide variety of industries, including finance and banking, accounting services, retail, automotive, software and technology, telecommunications, education, healthcare, pharmaceutical, energy oil and gas, transportation and shipping, real estate, forestry, insurance and others. He was responsible for a number of the firm's prominent cases, including litigation involving Qualcomm, RH Inc., Intel, Cobalt, Apollo Education Group and others.

Mr. Stickney has been widely recognized for his professional achievements as one of the top litigators in the country by the legal media and industry observers. In March 2016, *The Recorder* selected David as a "Litigation Groundbreaker" for his work recovering billions of dollars from sellers of toxic mortgage securities. *The Daily Journal* named him one of the top 30 plaintiff lawyers in California for 2016. In November 2014, *Law360* profiled him as one of the "Titans of the Plaintiffs Bar," as well twice naming him a "Class Action MVP," one of only a handful of litigators selected nationally. From 2014, *Lawdragon* magazine selected him to its exclusive list of the 500 Leading Lawyers in America, and since 2008 has been named a Rising Star; and a "Litigation Star" by *Benchmark (The Definitive Guide to America's Leading Litigation Firms & Attorneys)*. Thomson recognized him as a San Diego Super Lawyer; and featured him in the Corporate Counsel edition of *Super Lawyers*.

Mr. Stickney has lectured on securities litigation and shareholder matters for seminars and programs sponsored by professional organizations. He has also authored and co-authored several articles concerning securities litigation and class actions.

During 1996-1997, David served as law clerk to the Honorable Bailey Brown of the United States Court of Appeals for the Sixth Circuit.

Education: University of California, Davis, B.A., 1993. University of Cincinnati College of Law, J.D., 1996; Jacob B. Cox Scholar; Lead Articles Editor of University of Cincinnati Law Review.

Admissions: California; United States Courts of Appeals for the Second, Fifth, Sixth, Eighth, and Ninth Circuits; United States District Courts for the Central, Northern, and Southern Districts of California; United States District Court for the District of Colorado.

Role in Symantec Litigation: Before retiring from the firm in March 2019, Mr. Stickney was the partner with primary responsibility for the day-to-day supervision of the litigation. Among other things, he was personally involved in and oversaw the drafting of the initial complaint and the opposition to Defendants' motion to dismiss. He also argued the motion to dismiss in January 2019.

Rate Information: Mr. Stickney's hourly rate was \$975. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Stickney's rate was comparable to prevailing rates for senior litigation partners with similar experience and qualifications. Based on the same analysis and publicly available information, Mr. Stickney's hourly rate was lower than the publicly available rates of senior litigation partners at large defense firms against whom Lead Counsel routinely litigates in complex securities class actions like this one.

SENIOR COUNSEL

David L. Duncan, Senior Counsel

Qualifications & Experience: David L. Duncan's practice concentrates on the settlement of class actions and other complex litigation and the administration of class action settlements.

Prior to joining BLB&G, Mr. Duncan worked as a litigation associate at Debevoise & Plimpton, where he represented clients in a wide variety of commercial litigation, including contract disputes, antitrust and products liability litigation, and in international arbitration. In addition, he has represented criminal defendants on appeal in New York State courts and has successfully litigated on behalf of victims of torture and political persecution from Sudan, Côte d'Ivoire and Serbia in seeking asylum in the United States.

While in law school, David served as an editor of the *Harvard Law Review*. After law school, he clerked for Judge Amalya L. Kearse of the U.S. Court of Appeals for the Second Circuit.

Education: Harvard Law School, J.D., 1997; Harvard College, A.B., Social Studies, 1993.

Admissions: New York; Connecticut; United States District Court for the Southern District of New York.

Role in Symantec Litigation: Mr. Duncan's primary role at the Firm is to manage and implement class action settlements. In that capacity in the *Symantec* litigation, Mr. Duncan had primary responsibility for drafting, editing, and coordinating the settlement documentation, including the term sheet and the Stipulation of Settlement. Mr. Duncan was also involved in drafting the Class notice in May 2020 and was responsible for coordinating with the claims administrator regarding dissemination of notice to the Class.

Rate Information: Mr. Duncan's hourly rate is \$775. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Duncan's rate is comparable to prevailing rates for lawyers with similar experience and qualifications. Based on the same analysis and publicly available information, Mr. Duncan's hourly rate is lower than the publicly available rates of senior counsel at large defense firms against whom Lead Counsel routinely litigates in complex securities class actions like this one.

Lucas Gilmore, Former Senior Counsel

Qualifications & Experience: Prior to leaving Lead Counsel in 2019, Lucas E. Gilmore practiced out of the firm's San Diego office and focused on securities class actions and individual investor actions.

Mr. Gilmore represented BlackRock, PIMCO, and nine other prominent institutional investors in six representative actions pending in the U.S. District Court of the Southern District of New York against the principal financial crisis-era RMBS trustee banks: U.S. Bank National Association; Deutsche Bank National Trust Company and Deutsche Bank Trust Company Americas; The Bank of New York Mellon; Wells Fargo; HSBC Bank USA, National Association; and Citibank N.A. The actions were brought by the plaintiffs in their representative capacity on behalf of over 2,200 RMBS trusts issued between 2004 and 2008. The suits alleged that the trustees breached contractual, statutory, and common law duties owed to the trusts and certificate-holders. The suits were brought as derivative actions, or in the alternative, as class actions on behalf of all current owners of certificates in the trusts.

In addition, Mr. Gilmore litigated securities fraud class action lawsuits, including *In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations* pending in the District of Columbia, *Government of Guam Retirement Fund v. Invacare Corporation* pending in the Northeastern District of Ohio, *Deerfield Beach Police Pension Fund v. Quality Systems, Inc.* pending in the Central District of California, and *Anderson v. Spirit AeroSystems Holdings, Inc.* pending in the District of Kansas, and represented class plaintiffs in antitrust litigation arising from the manipulation of LIBOR.

He also represented prominent U.S. and international institutional investors in numerous direct action matters, including opt-out actions against BP plc in Texas federal court arising out of the catastrophic 2010 Gulf of Mexico oil spill, against AIG in California state court arising out of AIG's massive accumulated exposure to the housing and subprime mortgage markets in the years leading up to the financial crisis, and against Petróleo Brasileiro (Petrobras) in Manhattan federal court arising out of the long-running bribery and kickback scheme at the Brazilian oil giant.

Mr. Gilmore was selected as a member of the Leadership Development Committee of the San Diego Chapter of the Association of Business Trial Lawyers. For his outstanding work, Mr. Gilmore was also recognized as one of San Diego's "Rising Stars" in 2014 by *Super Lawyers*.

Prior to joining BLB&G, Mr. Gilmore was an associate at a law firm in San Francisco, where he successfully prosecuted and defended a variety of civil actions, including commercial, consumer and antitrust cases from the discovery stage through trial. He also gained significant experience as a judicial extern for the Honorable Vaughn R. Walker of the United States District Court for the Northern District of California.

Education: Vanderbilt University, B.A., Political Science, 2002; University of California, Hastings College of the Law, J.D., 2007; Computer Assisted Learning Institute Award for Excellence in Trial Advocacy I and II.

Admissions: California; United States Court of Appeals for the Ninth Circuit; United States District Courts for the Eastern and Northern Districts of California.

Role in Symantec Litigation: Before leaving the firm in 2019, Mr. Gilmore was heavily involved in investigating potential claims and drafting the initial complaint and Lead Plaintiff's opposition to Defendants' motion to dismiss.

Rate Information: Mr. Gilmore's hourly rate was \$775. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Gilmore's rate was comparable to prevailing rates for attorneys with his experience and qualifications. Based on the same analysis and publicly available information, Mr. Gilmore's hourly rate was lower than the publicly available rates of senior counsel at large defense firms against whom Lead Counsel routinely litigates in complex securities class actions like this one.

Richard Gluck, Senior Counsel

Qualifications & Experience: Mr. Gluck has more than 30 years of litigation and trial experience in bet-the-company cases. His practice focuses on securities fraud, corporate governance, and shareholder rights litigation. He has been named a *Super Lawyer* in securities litigation and one of San Diego's "Top Lawyers" practicing complex business litigation. Since joining BLB&G, Mr. Gluck has been a key member of the teams prosecuting many high-profile cases, including several RMBS class and direct actions against a number of large Wall Street Banks. He was a senior attorney on the team prosecuting the *In re Lehman Brothers Equity/Debt Securities Litigation*, which resulted in over \$615 million for investors and is considered one of the largest total recoveries for shareholders in any case arising from the financial crisis.

Specifically, he was instrumental in developing important evidence that led to the \$99 million settlement with Lehman's former auditor, Ernst & Young – at the time one of the top 10 auditor settlements ever achieved. He also was a senior member of the teams that prosecuted the RMBS class actions against Bear Stearns, which settled for \$500 million; JPMorgan, which settled for \$280 million; Wilmington Trust, which settled for \$210 million; and Morgan Stanley, which settled for \$95 million. He was also a key member of the trial teams that prosecuted the litigations against MF Global, which recovered \$234.3 million on behalf of investors; and Genworth, which settled for \$219 million.

Before joining BLB&G, Mr. Gluck represented corporate and individual clients in securities fraud and consumer class actions, SEC investigations and enforcement actions, and in actions involving claims of fraud, breach of contract and misappropriation of trade secrets in state and federal courts and in arbitration. He has obtained verdicts or awards for clients in multi-million-dollar lawsuits and arbitrations. Before entering private practice, Mr. Gluck clerked for Judge William H. Orrick of the United States District Court for the Northern District of California and externed for former California Supreme Court justice Stanley Mosk.

Mr. Gluck is a former President of the San Diego Chapter of the Association of Business Trial Lawyers and currently is a member of its Board of Governors.

Role in Symantec Litigation: After joining the litigation team in 2020, Mr. Gluck took many important depositions of former Symantec officers, including the former CFO, Chief of Staff, Controller, and head of SEC reporting, as well as the deposition of KPMG, Symantec's outside auditor. Mr. Gluck also worked closely with Lead Plaintiff's expert witnesses and was deeply involved in expert discovery, defending depositions of two experts and taking the deposition of one of Defendants' experts. Mr. Gluck also prepared substantial parts of Lead Plaintiff's opposition to summary judgment and supporting evidence, as well as Lead Plaintiff's supplemental mediation submission.

Rate Information: Mr. Gluck's hourly rate is \$800. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Gluck's rate is comparable to the prevailing rates for senior counsel with his experience and qualifications. Based on the same analysis and publicly available information, Mr. Gluck's hourly rate is lower than the publicly available rates of senior counsel at large defense firms against whom Lead Counsel routinely litigates in complex securities class actions like this one.

ASSOCIATES

Lauren Cruz, Associate

Qualifications & Experience: Lauren Cruz practices out of the firm's Los Angeles office, where she prosecutes class and direct actions on behalf of the firm's institutional investor clients. She is currently a member of the teams prosecuting securities class actions against Wells Fargo & Company, Mohawk Industries, Inc., CVS Health Corporation, NVIDIA Corporation, and Qualcomm, Inc., among others.

Ms. Cruz is also a board member of Mental Health Advocacy Services, a non-profit organization that provides free legal services to people with mental health disabilities in Los Angeles.

Prior to joining BLB&G, Ms. Cruz was a litigation associate at Sullivan & Cromwell LLP, where she represented domestic and international clients in complex civil litigation and alternative dispute resolution. She also gained considerable experience advising company boards following

internal investigations of shareholder demands. In addition, Ms. Cruz's practice included substantial pro bono civil rights class action litigation on behalf of immigration detainees with indicia of mental health disabilities.

Education: New York University School of Law, J.D., 2014, Senior Articles Editor, *Journal of Law and Liberty*; Staff Editor, *Environmental Law Journal*; California State University Channel Islands, B.S., Business, 2008.

Admissions: California; United States District Court for the Central District of California; United States District Court for the Eastern District of California; United States District Court for the Northern District of California; United States District Court for the Southern District of California; United States Court of Appeals for the Ninth Circuit.

Role in Symantec Litigation: Ms. Cruz performed legal research in connection with preparation of Lead Plaintiff's extensive opposition to Defendants' motion for summary judgment.

Rate Information: Ms. Cruz's hourly rate is \$550. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Ms. Cruz's rate is comparable to prevailing rates for litigation associates with her with similar experience and qualifications at other Plaintiffs' firms. Based on the same analysis and publicly available information, Ms. Cruz's hourly rate is lower than the publicly available rates of associates at large defense firms against whom Lead Counsel routinely litigates in complex securities class actions like this one.

Ryan Dykhous, Associate

Qualifications & Experience: Ryan Dykhous practices out of the firm's New York office and prosecutes securities fraud, corporate governance, and shareholder rights litigation on behalf of the firm's institutional investor clients.

Prior to joining the firm, he was a Disputes Resolution Associate with Freshfields Bruckhaus Deringer, where he represented public and private companies on internal and government investigations, sanctions compliance, and litigation matters.

While attending Harvard Law School, Mr. Dykhous served as the Executive Managing Editor of the *Harvard Civil Rights – Civil Liberties Law Review*. He also represented clients in housing eviction cases as counsel with the Harvard Legal Aid Bureau, and served as a Legal Intern for the Civil Division of the United States Attorney's Office, Southern District of New York.

Education: Harvard Law School, J.D., 2017, Executive Managing Editor, *Harvard Civil Rights – Civil Liberties Law Review*; Hunter College, M.S.Ed., 2014; Olivet Nazarene University, B.A., 2012.

Admission: New York.

Role in Symantec Litigation: Mr. Dykhousé joined the team in 2019 and, thereafter, was significantly involved in all aspects of the case, including through the pleading, discovery and summary judgment phases of the litigation. He was involved in the research and drafting of the amended complaint and related motions and was extensively involved in Lead Counsel's discovery efforts, including drafting discovery requests to Defendants, preparing Lead Plaintiff's responses and objections to discovery requests, engaging in the review and analysis of the documents produced by Defendants, working with Lead Plaintiff's experts, drafting Lead Plaintiff's settlement conference submissions and Lead Plaintiff's extensive opposition to Defendants' motion for summary judgment. Mr. Dykhousé also took several depositions of current and former Symantec employees, defended one of Lead Plaintiff's experts at deposition and took the deposition of one of Defendants' experts.

Rate Information: Mr. Dykhousé's hourly rate is \$425. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Dykhousé's rate is comparable to prevailing rates for litigation associates with similar experience and qualifications at other Plaintiffs' firms. Based on the same analysis and publicly available information, Mr. Dykhousé's hourly rate is lower than the publicly available rates of associates at large defense firms against whom Lead Counsel routinely litigates in complex securities class actions like this one.

Jacob Spaid, Former Associate

Qualifications & Experience: Jacob Spaid practiced out of the firm's San Diego office, where he prosecuted securities fraud, corporate governance, and shareholder rights litigation on behalf of the firm's institutional investor clients.

He was a member of the team representing prominent institutional investors, including BlackRock and PIMCO, against six financial crisis-era RMBS trustee banks in ten cases before the U.S. District Court for the Southern District of New York, New York Supreme Court, and California Superior Court. The suits alleged that the RMBS trustee banks breached contractual, statutory and common law duties owed to the trusts and certificate holders.

Mr. Spaid was also involved in litigation against Qualcomm, Inc., and Cobalt International Energy, Inc., and in the firm's direct action opt-out practice, including in direct actions brought against American Realty Capital Properties.

Prior to joining the firm, Mr. Spaid represented national and international insurance companies and businesses in a broad range of litigation. While in law school, he was a Judicial Extern for the Honorable Ruben Brooks in the Southern District of California and the Honorable Steven R. Denton in the San Diego Superior Court.

Super Lawyers named Mr. Spaid a "Rising Star" for the years 2017, 2018 and 2019.

Education: San Diego State University, B.S., Business Administration, 2009, magna cum laude. San Diego State University, MBA., 2014. California Western School of Law, J.D., 2014, magna cum laude; Associate Writer, Editor and Senior Editor, California Western Law Review; Associate Writer and Editor, California Western International Law Journal.

Admissions: California; United States Court of Appeals for the Ninth Circuit; United States District Courts for the Central, Eastern, Northern, and Southern Districts of California.

Role in Symantec Litigation: Before leaving the firm in 2019, Mr. Spaid was significantly involved in researching and investigating potential claims, preparing FOIA requests to the SEC, drafting the initial complaint, and preparing the opposition to Defendants' motion to dismiss.

Rate Information: Mr. Spaid's hourly rate was \$475. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Spaid's rate was comparable to prevailing rates for litigation associates with similar experience and qualifications at other Plaintiffs' firms. Based on the same analysis and publicly available information, Mr. Spaid's hourly rate was lower than the publicly available rates of associates at large defense firms against whom Lead Counsel routinely litigates in complex securities class actions like this one.

Julia Tebor, Former Associate

Qualifications & Experience: Julia Tebor practiced out of the New York office and prosecuted securities fraud, corporate governance, and shareholder rights litigation on behalf of the firm's institutional investor clients. She was a member of the trial team that recovered \$210 million on behalf of defrauded investors in *In re Wilmington Trust Securities Litigation*. She was a member of the teams prosecuting *In re Green Mountain Coffee Roasters, Inc. Securities Litigation* and *St. Paul Teachers' Retirement Fund Association v. HeartWare International, Inc.*

A former litigation associate with Seward & Kissel, Ms. Tebor also has broad experience in white-collar, general commercial, and employment litigation matters on behalf of clients in the financial services industry, as well as in connection with SEC and DOJ investigations.

Education: Tufts University, B.A., Spanish & English, 2006, Dean's List. Boston University, School of Law, J.D., 2012, *cum laude*; *American Journal of Law and Medicine*, Notes Editor.

Admissions: New York; Massachusetts.

Role in Symantec Litigation: Ms. Tebor was extensively involved in all aspects of the cases before leaving the firm in early 2020. She was heavily involved in drafting the initial complaint, the opposition to the motion to dismiss the initial complaint, the amended complaint and motion for leave to file the amended complaint, and the motion for class certification. She also prepared discovery requests to Defendants and Lead Plaintiff's responses and objections to discovery requests.

Rate Information: Ms. Tebor's hourly rate was \$575. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Ms. Tebor's rate was comparable to prevailing rates for litigation associates with similar experience and qualifications at other Plaintiffs' firms. Based on the same analysis and publicly available information, Ms. Tebor's hourly rate is lower than the publicly available rates of associates at large defense firms against whom Lead Counsel routinely litigates in complex securities class actions like this one.

SENIOR STAFF ATTORNEYS

Andrew Boruch, Senior Staff Attorney

Qualifications & Experience: Mr. Boruch has been a staff attorney at BLB&G since February 2011. He has worked on a number of the firm's largest cases, including against Citigroup, Bank of America, Wells Fargo, Akorn, and Allergan. Mr. Boruch earned his JD from NYU Law and has a BA from The Ohio State University. Prior to joining BLB&G, he was an associate attorney at DLA Piper.

Role in Symantec Litigation: Mr. Boruch was heavily involved in the preparation for depositions of Symantec executives, experts, and third parties. Among other things, he analyzed documents produced by Defendants and third parties to identify potential exhibits and prepared witness memos and deposition kits for the attorneys taking the depositions.

Rate Information: Mr. Boruch's hourly rate is \$425. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Boruch's rate is comparable to prevailing rates for senior staff attorneys with his experience and qualifications.

Ryan Candee, Senior Staff Attorney

Qualifications & Experience: Mr. Candee has been a staff attorney with BLB&G since February 2011. During that time, he has worked on several complex cases with a focus on financial firms such as *In re Citigroup, Inc. Bond Action Litigation*, *In re BNY Mellon Corp, Forex Transactions Litigation*, and more recently *Lord Abbet Affiliated Fund, Inc. v. Navient Corp.* He earned his J.D. from New York University School of Law.

Role in Symantec Litigation: Mr. Candee was heavily involved in the preparation for depositions of Symantec executives, experts, and third parties. Among other things, he analyzed documents produced by Defendants and third parties to identify potential exhibits and prepared witness memos and deposition kits for the attorneys taking the depositions. He also was involved in the preparation for the scheduled final pre-trial conference, including helping to prepare exhibit lists.

Rate Information: Mr. Candee's hourly rate is \$425. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Candee's rate is comparable to prevailing rates for senior staff attorneys with his experience and qualifications.

Brian Chau, Senior Staff Attorney

Qualifications & Experience: Brian Chau is a senior staff attorney practicing out of BLB&G's New York office. He represents the firm's institutional investor clients in securities fraud-related matters. He previously worked on the *In re Bank of America Securities Litigation*, *In re Facebook IPO*, and *In re MF Global Holdings Ltd.*

Mr. Chau is a graduate of Fordham Law School, where he was an associate editor of the *Fordham Intellectual Property, Media & Entertainment Law Journal*. He graduated from New York University, where he received his Bachelor of Science degree in finance and information systems.

Education: Fordham University School of Law, J.D., 2006, Fordham Intellectual Property, Media & Entertainment Law Journal, Associate Editor; New York University - Leonard N. Stern School of Business, B.S., 2003.

Admission: New York.

Role in Symantec Litigation: Mr. Chau was involved in several aspects of the case. In addition to reviewing and analyzing Defendants' productions and presenting documents during weekly "Hot Document" meetings, Mr. Chau was heavily involved in the preparation for depositions of Symantec executives, experts, and third parties, including analyzing documents produced by Defendants and third parties to identify potential exhibits and preparing witness memos and deposition kits for the attorneys taking the depositions.

Rate Information: Mr. Chau's hourly rate is \$425. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Chau's rate is comparable to prevailing rates for senior staff attorneys with his experience and qualifications.

Lawrence Hosmer, Senior Staff Attorney

Qualifications & Experience: Mr. Hosmer has been a staff attorney with BLB&G since January 2012. Primarily involved with the firm's securities fraud practice, his securities cases have included the *State Street* and *BNYM Forex* matters, *General Motors*, *Allergan*, *Wells Fargo*, *Adeptus*, and *Navient*. Mr. Hosmer has a B.A. from the University of Texas in Austin, a J.D. from Southern Methodist University in Dallas, and practiced law in Texas for several years before moving to the northeast.

Role in Symantec Litigation: Mr. Hosmer was involved in several aspects of the case, including reviewing and analyzing Defendants' productions and presenting documents during weekly "Hot Document" meetings. He was heavily involved in the preparation for depositions of Symantec executives, experts, and third parties, including analyzing documents produced by Defendants and third parties to identify potential exhibits and preparing witness memos and deposition kits for the attorneys taking the depositions. Mr. Hosmer also helped prepare Lead Plaintiff's opposition to Defendants' motion for summary judgment.

Rate Information: Mr. Hosmer's hourly rate is \$425. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Hosmer's rate is comparable to prevailing rates for senior staff attorneys with similar experience and qualifications.

Stephen Imundo, Senior Staff Attorney

Qualifications & Experience: Stephen Imundo is a senior staff attorney in BLB&G's New York office, and primarily provides electronic discovery assistance and support in litigation of securities fraud-related matters. He has led discovery teams of over 25 attorneys on multiple occasions and worked on some of the firm's most significant cases, including *Citigroup* and the *General Motors* litigation.

Early in his legal career, Mr. Imundo joined up with the firm Schoengold, Sporn, Laitman & Lometti where he focused on securities fraud class action litigation, and worked side by side with BLB&G attorneys on the Worldcom case.

He graduated from Fordham University School of Law where he was a recipient of the Archibald R. Murray Public Service Award and was the associate editor of the *Fordham Environmental Law Journal*.

Education: Fordham University School of Law, J.D., 2002, *Archibald R. Murray Public Service Award*, Associate Editor *Fordham Environmental Law Journal*; Mercy College, B.S., 1996.

Admissions: New York; Connecticut.

Role in Symantec Litigation: Mr. Imundo was involved in several aspects of the case, including reviewing and analyzing Defendants' productions and presenting documents during weekly "Hot Document" meetings. Mr. Imundo also helped prepare for depositions of Symantec executives, experts, and third parties by analyzing documents produced by Defendants and third parties to identify potential exhibits and preparing witness memos and deposition kits for the attorneys taking the depositions. Mr. Imundo also helped identify evidence in support of Lead Plaintiff's opposition to summary judgment.

Rate Information: Mr. Imundo's hourly rate is \$425. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Imundo's rate is

comparable to prevailing rates for senior staff attorneys with similar experience and qualifications.

STAFF ATTORNEYS

Lauren E. Cormier, Staff Attorney

Qualifications & Experience: Ms. Cormier has been a Staff Attorney at BLB&G since November 2013. She has worked on a number of high-profile cases including *Merck-Vioxx*, *MF Global*, *Wilmington Trust*, *comScore*, *Wells Fargo*, and others. She received her J.D. from St. John's University School of Law and her B.A. from University of Richmond. Prior to attending law school, she worked as an Analyst for a prominent law firm in Richmond, Virginia and as a Legal Assistant at a firm in Bronxville, New York.

Education: University of Richmond, B.A., *cum laude*, 2002; St. John's University School of Law, J.D., 2010.

Admission: New York.

Role in Symantec Litigation: Ms. Cormier was involved in several aspects of the case, including reviewing and analyzing Defendants' productions and presenting documents during weekly "Hot Document" meetings. Ms. Cormier was also heavily involved in the preparation for depositions of Symantec executives, experts, and third parties, including analyzing documents produced by Defendants and third parties to identify potential exhibits and preparing witness memos and deposition kits for the attorneys taking the depositions. Ms. Cormier also located evidence supporting Lead Plaintiff's summary judgment opposition and performed various factual research projects on relevant accounting issues.

Rate Information: Ms. Cormier's hourly rate is \$375. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Ms. Cormier's rate is comparable to prevailing rates for staff attorneys with her experience and qualifications.

Igor Faynshteyn, Staff Attorney

Qualifications & Experience: Mr. Faynshteyn has been a Staff Attorney with BLB&G since 2017. He has worked on multiple securities fraud class actions and is a USPTO registered patent attorney.

Education: City University of New York, Hunter College, B.A., 2005; M.A., 2006. Brooklyn Law School, J.D., 2011.

Admission: New York.

Role in Symantec Litigation: Mr. Faynshteyn was extensively involved in fact discovery,, including reviewing and analyzing Defendants’ productions for relevance and presenting documents during weekly “Hot Document” meetings. Mr. Faynshteyn also helped prepare for depositions of Symantec executives, experts, and third parties by analyzing documents produced by Defendants and third parties to identify potential exhibits and preparing witness memos and deposition kits for the attorneys taking the depositions.

Rate Information: Mr. Faynshteyn’s hourly rate is \$375. Based on Lead Counsel’s review and analysis of court-approved fees and other publicly available information, Mr. Faynshteyn’s rate is comparable to prevailing rates for staff attorneys with his experience and qualifications.

Helen Fikrey, Staff Attorney

Qualifications & Experience: Helen Fikrey has worked on several matters at BLB&G, including *Allianz Structured Alpha Funds Litigation*; and *Felix v. Symantec Corporation et al.*

Prior to joining the firm, Ms. Fikrey was a staff attorney at Quinn Emanuel Urquhart & Sullivan LLP and Cohen Milstein Sellers & Toll PLLC, where she worked on securities and other complex litigations. She previously was a Clinical Assistant Professor at Stony Brook University where she created and taught law and social change courses at the university’s graduate social work program.

Education: Addis Ababa University School of Law, LL.B., 2003; Columbia University School of Law, LL.M., 2007.

Admission: New York.

Role in Symantec Litigation: Ms. Fikrey was involved in several aspects of the case, including reviewing and analyzing Defendants’ productions and presenting documents during weekly “Hot Document” meetings. Ms. Fikrey was heavily involved in the preparation for depositions of Symantec executives, experts, and third parties, including analyzing documents produced by Defendants and third parties to identify potential exhibits and preparing witness memos and deposition kits for the attorneys taking the depositions.

Rate Information: Ms. Fikrey’s hourly rate is \$400. Based on Lead Counsel’s review and analysis of court-approved fees and other publicly available information, Ms. Fikrey’s rate is comparable to prevailing rates for staff attorneys with her experience and qualifications.

Colette Foster, Staff Attorney

Qualifications & Experience: Colette Foster worked on *Hefler et al. v. Wells Fargo & Company et al.* at BLB&G. Prior to joining the firm, Colette was Corporate Counsel at MetLife, Inc. Previously, Ms. Foster was a corporate associate at Edwards Angell Palmer & Dodge LLP, Schulte Roth & Zabel LLP, and Sidley Austin LLP.

Education: Hollins University, B.A., 1985, *cum laude*; Columbia University, Mailman School of Public Health, Master of Public Health, 1989; New York Law School, J.D., 2001, *magna cum laude*.

Admissions: New York; Connecticut.

Role in Symantec Litigation: Ms. Foster primarily was involved in reviewing and analyzing Defendants' and third parties' document productions and presenting documents during weekly "Hot Document" meetings. She also assisted with the preparation for depositions of Symantec executives, experts, and third parties.

Rate Information: Ms. Foster's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Ms. Foster's rate is comparable to prevailing rates for staff attorneys with her experience and qualifications.

Addison F. Golladay, Staff Attorney

Qualifications & Experience: Mr. Golladay has been a staff attorney with BLB&G since January 2011. He has worked on numerous cases ranging from securities fraud class actions against major banks like Wells Fargo to shareholder derivative suits against companies like News Corp. He earned his JD/MBA from the University of Michigan and previously worked as an associate at Latham & Watkins LLP.

Education: Columbia College, B.A., *cum laude*, 1993; Stephen M. Ross School of Business, M.B.A., 2005; The University of Michigan Law School, J.D., 2005.

Admission: New York.

Role in Symantec Litigation: Mr. Golladay primarily was involved in reviewing and analyzing Defendants' and third parties' document productions and presenting documents during weekly "Hot Document" meetings. He also summarized depositions and searched for and identified helpful testimony and evidence supporting Lead Plaintiff's opposition to Defendants' summary judgment motion.

Rate Information: Mr. Golladay's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Golladay's rate is comparable to prevailing rates for staff attorneys with his experience and qualifications.

Ibrahim Hamed, Former Staff Attorney

Qualifications & Experience: Ibrahim Hamed has worked on numerous matters at BLB&G, including *City of Sunrise General Employees' Retirement Plan v. FleetCor Technologies, Inc., et al.*; *In re Akorn, Inc. Securities Litigation*; *Hefler et al. v. Wells Fargo & Company et al.*; *Medina et al. v. Clovis Oncology, Inc., et al.*; and *Fresno County Employees' Retirement Association v. comScore, Inc.*

Prior to joining the firm, Mr. Hamed worked at Labaton Sucharow LLP and Graiss & Ellsworth LLP, where he worked on residential mortgage-backed securities litigation. Previously, he was a Senior Staff Attorney at Skadden, Arps, Slate, Meagher & Flom, LLP, where he worked on complex securities litigation.

Education: University of Lagos, Nigeria, LL.B., 1992; Rivers State University, Nigeria, LL.M, 1998.

Admission: New York.

Role in Symantec Litigation: Mr. Hamed primarily was involved in reviewing and analyzing Defendants' and third parties' document productions and presenting documents during weekly "Hot Document" meetings. He also helped prepare for depositions of Symantec executives, experts, and third parties by analyzing documents produced by Defendants and third parties to identify potential exhibits and preparing witness memos and deposition kits for the attorneys taking the depositions.

Rate Information: Mr. Hamed's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Hamed's rate is comparable to prevailing rates for staff attorneys with his experience and qualifications.

Monique Hardial, Former Staff Attorney

Qualifications & Experience: Monique Hardial has worked on numerous matters at BLB&G, including *City of Sunrise General Employees' Retirement Plan v. FleetCor Technologies, Inc., et al.*; *In re Akorn, Inc., Securities Litigation*; *Hefler et al. v. Wells Fargo & Company et al.*; *Medina et al. v. Clovis Oncology, Inc., et al.*; and *Fresno County Employees' Retirement Association v. comScore, Inc.* Prior to joining the firm, Monique was a contract attorney at several New York law firms.

Education: St. John's University, B.A., 2003; New York Law School, J.D., 2010.

Admission: New York.

Role in Symantec Litigation: Ms. Hardial primarily was involved in reviewing and analyzing Defendants' and third parties' document productions and presenting documents during weekly "Hot Document" meetings. She also helped prepare for depositions of Symantec executives, experts, and third parties by analyzing documents produced by Defendants and third parties to identify potential exhibits and preparing witness memos and deposition kits for the attorneys taking the depositions.

Rate Information: Ms. Hardial's hourly rate is \$375. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Ms. Hardial's rate is comparable to prevailing rates for staff attorneys with her experience and qualifications.

Jed Koslow, Staff Attorney

Qualifications & Experience: Mr. Koslow has been a staff attorney at BLB&G since 2009. He has worked on many of the firm's high-profile cases, such as *Bank of America*, *Merck*, and *General Motors*. After graduating from Brooklyn Law School in 2006, he practiced in-house as Director of Business Affairs at an internet company pioneering in the world of web video, in both technology and content.

Education: Wesleyan University, B.A., 1999; Brooklyn Law School, J.D., 2006.

Admission: New York.

Role in Symantec Litigation: Mr. Koslow was involved in several aspects of the case, including reviewing and analyzing Defendants' productions and presenting documents during weekly "Hot Document" meetings. Mr. Koslow was heavily involved in the preparation for depositions of Symantec executives, experts, and third parties, including analyzing documents produced by Defendants and third parties to identify potential exhibits and preparing witness memos and deposition kits for the attorneys taking the depositions. He also located and analyzed evidence supporting Lead Plaintiff's summary judgment opposition, performed various factual research projects on relevant accounting issues, and identified documents for inclusion on Lead Plaintiff's exhibit list.

Rate Information: Mr. Koslow's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Koslow's rate is comparable to prevailing rates for staff attorneys with his experience and qualifications.

Erick Ladson, Staff Attorney

Qualifications & Experience: Mr. Ladson has been a Staff Attorney with BLB&G since March 2019. He has worked on several matters at BLB&G, including *Lord Abbett Affiliated Fund, Inc., et al v. Navient Corporation, et al.*; and *In re Equifax Inc., Securities Litigation*.

Prior to joining the firm, Erick was a staff attorney at Labaton Sucharow LLP, where he worked on various complex securities litigation matters. Erick previously worked as outside trial counsel for MetLife.

Education: City College of New York, B.A., 1993; New York Law School, J.D., 1998.

Admission: New York

Role in Symantec Litigation: Mr. Ladson primarily was involved in reviewing and analyzing Defendants' and third parties' document productions and presenting documents during weekly "Hot Document" meetings. He also helped prepare for depositions of Symantec executives, experts, and third parties by analyzing documents produced by Defendants and third parties to identify potential exhibits and preparing witness memos and deposition kits for the attorneys taking the depositions.

Rate Information: Mr. Ladson's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Ladson's rate is comparable to prevailing rates for staff attorneys with his experience and qualifications.

Juan Lossada, Staff Attorney

Qualifications & Experience: Juan Lossada has worked on several matters at BLB&G, including *New Orleans Employees' Retirement System v. Mattel, Inc.* and *In re Impinj, Inc. Securities Litigation*. Prior to joining the firm, Juan was a contract attorney at several firms where he worked on discovery matters. Previously, Juan was an associate at Kinkle, Rodiger & Spriggs, LLP, where he focused on civil litigation, including jury trials, and an associate at Crowe & Rogan, LLP.

Education: University of Southern California, B.S.; University of Southern California, Gould School of Law, J.D., 1987.

Admission: California.

Role in Symantec Litigation: Mr. Lossada primarily was involved in reviewing and analyzing Defendants' and third parties' document productions and presenting documents during weekly "Hot Document" meetings. He also helped identify evidence supporting Lead Plaintiff's opposition to Defendants' summary judgment motion.

Rate Information: Mr. Lossada's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Lossada's rate is comparable to prevailing rates for staff attorneys with his experience and qualifications.

Ryan McCurdy, Staff Attorney

Qualifications & Experience: Ryan McCurdy has worked on several matters at BLB&G, including *In re EQT Corporation Securities Litigation*; and *In re Impinj, Inc. Securities Litigation*. Prior to joining the firm, Ryan was an eDiscovery project manager, managing all aspects of eDiscovery for large firms and corporate clients. Previously, Ryan worked as a contract attorney on complex litigation, including antitrust and mortgage-backed securities litigation.

Education: Emory University, B.A., 1999; UCLA School of Law, J.D., 2003.

Admission: California.

Role in Symantec Litigation: Mr. McCurdy primarily was involved in reviewing and analyzing Defendants' and third parties' document productions and presenting documents during weekly "Hot Document" meetings.

Rate Information: Mr. McCurdy's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. McCurdy's rate is comparable to prevailing rates for staff attorneys with his experience and qualifications.

Ingvar Olsson, Staff Attorney

Qualifications & Experience: Ingvar Olsson worked on several matters at BLB&G including *Felix v. Symantec Corporation et al.* Prior to joining the firm, Ingvar worked as a contract attorney at various law firms including Cravath, Swaine & Moore, Debevoise & Plimpton and Sullivan & Cromwell.

Education: University of Stockholm, Personnel Management, 1993; Monroe Community College, Management Program, Rochester, NY 1996; University of Stockholm School of Law, Sweden, LL.M., 2000; Temple University School of Law, Philadelphia, PA, LL.M., 2003.

Admission: New York.

Role in Symantec Litigation: As a Swedish speaker, Mr. Olsson played a key role in reviewing Lead Plaintiff's documents for production to Defendants. He also was heavily involved in reviewing and analyzing Defendants' and third parties' document productions and presenting documents during weekly "Hot Document" meetings. He also performed discrete research projects and prepared memoranda on those topics. Further, Mr. Olsson prepared a detailed timeline and key players list identifying the names and roles of the Symantec executives and outside auditors involved in the key events.

Rate Information: Mr. Olsson's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Olsson's rate is comparable to prevailing rates for staff attorneys with his experience and qualifications.

William Pham, Staff Attorney

Qualifications & Experience: William Pham worked on several matters at BLB&G, including *Felix v. Symantec Corporation et al.* Prior to joining the firm in 2020, William worked as a contract attorney with Selendy & Gay and Cravath, Swaine & Moore LLC.

Education: Arizona State University, Tempe, AZ, B.A.; New York Law School, J.D., 2010.

Admission: New York

Role in Symantec Litigation: Mr. Pham primarily was involved in reviewing and analyzing Defendants' and third parties' document productions and presenting documents during weekly "Hot Document" meetings. He also helped prepare for depositions of Symantec executives, experts, and third parties by analyzing documents produced by Defendants and third parties to identify potential exhibits.

Rate Information: Mr. Pham's hourly rate is \$375. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Pham's rate is comparable to prevailing rates for staff attorneys with his experience and qualifications.

Esinam Quarco, Staff Attorney

Qualifications & Experience: Ms. Quarco is a Staff Attorney in BLB&G's New York office where she has worked on matters including *In re Equifax Inc. Securities Litigation and Lord Abbett Affiliated Fund, Inc., et al v. Navient Corporation et al.* Before joining BLB&G, she served as the Associate Director of Corporation & Foundation Relations for Epiphany School in Boston.

Education: Wesleyan University, B.A., 2003; Temple University Beasley School of Law, J.D., 2006.

Admission: New York.

Role in Symantec Litigation: Ms. Quarco primarily was involved in reviewing and coding Defendants' and third parties' document productions for relevance and presenting documents during weekly "Hot Document" meetings.

Rate Information: Ms. Quarco's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Ms. Quarco's rate is comparable to prevailing rates for staff attorneys with similar experience and qualifications.

Justin Ratliff, Former Staff Attorney

Qualifications & Experience: Justin Ratliff has worked on several matters at BLB&G, including *Lord Abbett Affiliated Fund, Inc., et al. v. Navient Corporation, et al.* and *In re SCANA Corporation Securities Litigation*. Prior to joining the firm, Mr. Ratliff was an attorney at Selendy & Gay PLLC. Previously, he was an associate at Meloni & McCaffrey.

Education: North Carolina State University, B.A., 2009; North Carolina Central University, J.D., 2014.

Admission: New York.

Role in Symantec Litigation: Mr. Ratliff primarily was involved in reviewing and analyzing Defendants' and third parties' document productions and presenting documents during weekly "Hot Document" meetings. He also helped prepare for depositions of Symantec executives, experts, and third parties by analyzing documents produced by Defendants and third parties to identify potential exhibits.

Rate Information: Mr. Ratliff's hourly rate is \$350. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Ratliff's rate is comparable to prevailing rates for staff attorneys with similar experience and qualifications.

Daniel Renehan, Former Staff Attorney

Qualifications & Experience: Dan Renehan worked on numerous cases at BLB&G, including *In re MF Global Holdings Limited Securities Litigation*; *In re Citigroup Inc. Bond Litigation*; *In re Pfizer Inc. Shareholder Derivative Litigation*; *In re Wellcare Securities Litigation*; *In re Merrill Lynch & Co., Inc. Securities, Derivative and ERISA Litigation (Bond Action)*; *In re RAIT Financial Trust Securities Litigation*; *In re Refco, Inc. Securities Litigation*; *In re Converium Holding AG Securities Litigation*; *Affiliated Computer Services, Inc. Shareholder Derivative Litigation*; *Ohio Public Employees Retirement System, et al. v. Freddie Mac, et al.*; and *In re Symbol Technologies*,

Inc. Securities Litigation. He joined the firm in 2004. Prior to that, Mr. Renehan worked as an associate at Gibbons, Del Deo, Dolan Griffinger & Vecchione, P.C.

Education: State University of New York, College at Oswego, B.A, 1987; New York University, Graduate School of Arts & Science, M.A., 1991; Brooklyn Law School, J.D., 2000.

Admission: New York.

Role in Symantec Litigation: Mr. Renehan helped prepare for depositions of Symantec executives by reviewing and analyzing documents produced by Defendants and third parties to identify potential exhibits and preparing witness memos and deposition kits for the attorneys taking the depositions.

Rate Information: Mr. Renehan's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Renehan's rate is comparable to prevailing rates for staff attorneys with similar experience and qualifications.

Lewis Smith, Staff Attorney

Qualifications & Experience: Lewis Smith has worked on numerous matters at BLB&G, including *In re Fifth Street Finance Corp. Stockholder Litigation*; *Allstate Insurance Company v. Morgan Stanley & Co., Inc.*; *Dexia Holdings, Inc. v. JP Morgan*; and *In re Merck & Co., Inc. Securities Litigation (VIOXX-related)*. Mr. Smith currently focuses on corporate governance matters. Prior to joining the firm in 2012, Lewis was a contract attorney at Kenyon & Kenyon.

Education: Cal Poly State University, B.S., 2001; Brunel University, M.A., 2002; Seton Hall University School of Law, J.D., 2007.

Admission: New York.

Role in Symantec Litigation: As part of Lead Plaintiff's investigation of potential claims, Mr. Smith analyzed reports from securities analysts that covered Symantec.

Rate Information: Mr. Smith's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Smith's rate is comparable to prevailing rates for staff attorneys with similar experience and qualifications.

INVESTIGATORS

Amy Bitkower, Director of Investigations

Qualifications & Experience: Ms. Bitkower is a certified fraud examiner and has served as Director of Investigations at BLB&G since 2006—after working in the securities class action field since 1998. She is responsible for managing a team of highly specialized in-house investigators and certified fraud examiners.

Ms. Bitkower began her career at the New York County District Attorney’s office where she was an investigative analyst working on investigations ranging from low-level criminal activities to highly complex economic crimes. Early in her career, she taught courses in Criminology and Crime and Juvenile Delinquency at both Queens College and John Jay College of Criminal Justice.

Ms. Bitkower received her M.A. in Criminal Justice with a specialization in Criminal Law and Procedure from John Jay College of Criminal Justice and her B.A. in English from Emory University.

Role in Symantec Litigation: Ms. Bitkower conducted analysis and research into, and assembled lists of, former Symantec employees and others who may have relevant information about the alleged fraud. Thereafter, Ms. Bitkower oversaw her team’s efforts to contact, follow up with, and interview those potential leads. She also prepared or reviewed interview memoranda prepared for the attorneys involved in drafting the initial and amended complaints.

Rate Information: Ms. Bitkower’s hourly rate is \$575. Based on Lead Counsel’s review and analysis of court-approved fees and other publicly available information, Ms. Bitkower’s rate is comparable to prevailing rates for directors of investigations with similar experience and qualifications.

Jacob Foster, Investigative Analyst

Qualifications & Experience: Jacob Foster has worked as an Investigative Analyst at BLB&G on a wide range of cases since June 2018. Mr. Foster conducts data analysis on potential witness leads and assists the Firm’s investigations into potential securities fraud.

Role in Symantec Litigation: Mr. Foster researched and assembled lists of former Symantec employees and others who may have relevant information about the alleged fraud across various data sources.

Rate Information: Mr. Foster’s hourly rate is \$300. Based on Lead Counsel’s review and analysis of court-approved fees and other publicly available information, Mr. Foster’s rate is comparable to prevailing rates for analysts of his experience and qualifications.

Joelle Landino, Associate Director of Investigations

Qualifications & Experience: Joelle Landino is a certified fraud examiner who has worked at BLB&G since 2007.

Ms. Landino has over 15 years of experience in investigations, interviewing, and legal procedures. She began her career at the New York City Civilian Complaint Review Board, where she investigated allegations of misconduct filed against members of the New York City Police Department.

Joelle received her B.S. in Biology-Psychology, with a minor in Child Development from Tufts University and completed the NYPD Internal Affairs Bureau Internal Investigation Course.

Role in Symantec Litigation: Ms. Landino conducted analysis and research into, and assembled lists of, former Symantec employees and others who may have relevant information about the alleged fraud. She then contacted, followed up with, and interviewed potential leads and prepared interview memoranda for the attorneys involved in drafting the initial and amended complaints.

Rate Information: Ms. Landino's hourly rate is \$425. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Ms. Landino's rate is comparable to the prevailing rates for an associate director of investigations with similar experience and qualifications.

Andrew Thompson, Senior Investigator

Qualifications & Experience: Mr. Thompson is a certified fraud examiner who has worked at BLB&G since 2017. He has a decade of experience conducting investigations ranging from violent felonies to complex civil claims. While at John Jay College of Criminal Justice, he developed investigative interviewing techniques in collaboration with the FBI's Behavioral Science Unit and High-Value Detainee Interrogation Group.

Andrew received his M.A. in Forensic Psychology from John Jay College of Criminal Justice and his B.A. in Psychology from Simon Fraser University.

Role in Symantec Litigation: Mr. Thompson conducted analysis and research into, and assembled lists of, former Symantec employees and others who may have relevant information about the alleged fraud. He then contacted, followed up with, and interviewed potential leads and prepared interview memoranda for the attorneys involved in drafting the initial and amended complaints.

Rate Information: Mr. Thompson's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Thompson's rate is comparable to prevailing rates for senior investigators with similar experience and qualifications.

CASE MANAGERS & PARALEGALS

Dena Bielasz, Former Paralegal

Qualifications & Experience: Dena Bielasz was a Case Manager/ Certified Paralegal who worked at BLB&G in San Diego from March 2005 to February 2019. She assisted in various securities cases. Prior to BLB&G, she worked at McDonnell & Romaker, P.C. as a Certified Paralegal/Office Manager.

A graduate of Palomar College, Ms. Bielasz is a National Association of Legal Assistants (NALA) Certified Paralegal with a specialization in Social Security Disability Litigation.

Role in Symantec Litigation: Before leaving the firm in 2019, Ms. Bielasz performed paralegal work on this case, including preparing documents for submission to the Court, monitoring the news and related case dockets to keep the team apprised of relevant developments, and maintaining physical and electronic case materials (including discovery).

Rate Information: Ms. Bielasz's hourly rate was \$335. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Ms. Bieslasz's rate was comparable to prevailing rates for paralegals with her experience and qualifications.

Jose Echegaray, Case Manager

Qualifications & Experience: Jose Echegaray is a Case Manager in the firm's securities fraud practice and has been with BLB&G since February 2015. He has assisted the teams that prosecuted various matters including *Salix*, *Allergan Proxy Violation*, and *GT Advanced Technologies*, and is currently assisting the teams working on *Qualcomm*, *Facebook*, *Towers Watson*, *Navient*, *DXC*, and *NVIDIA*. Prior to working at BLB&G, Jose earned his BA in History from Boston University in 2012 and worked his first job as a legal assistant at Skadden, Arps, Slate, Meagher & Flom LLP's New York office

Role in Symantec Litigation: Mr. Echegaray provided support and assistance to the attorneys in their prosecution of this action by gathering documents and information requested by the attorneys, monitoring news and related case dockets to keep the team apprised of relevant developments as news related to the fraud was unfolding, maintaining physical and electronic case materials (including discovery), assisting with Court filings, cite checking briefs and other filings, and helping attorneys prepare for court hearings. In addition, Mr. Echegaray assisted attorneys preparing for depositions by organizing and making copies of potential exhibits.

Rate Information: Mr. Echegaray's hourly rate is \$350. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Echegaray's rate is comparable to prevailing rates for case managers with similar experience and qualifications.

Michelle Leung, Case Manager

Qualifications & Experience: Michelle Leung has been a case manager with the Firm since June 2019. Prior to working at BLB&G, Ms. Leung worked as a paralegal manager and litigation paralegal at Outten & Golden LLP.

Ms. Leung has a Bachelor of Science (Major: Legal Studies) from John Jay College of Criminal Justice, CUNY College.

Role in Symantec Litigation: Ms. Leung provided support and assistance to the attorneys in their prosecution of this action by gathering documents and information requested by the attorneys, monitoring the news and related case dockets to keep the team apprised of relevant developments as news related to the fraud was unfolding, maintaining physical and electronic case materials (including discovery), assisting with Court filings, cite checking briefs and other filings, helping attorneys prepare for court hearings, and organizing and making copies of potential deposition exhibits.

Rate Information: Ms. Leung's hourly rate is \$350. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Ms. Leung's rate is comparable to prevailing rates for case managers with similar experience and qualifications.

Preya Rodriguez, Paralegal

Qualifications & Experience: Preya Rodriguez is a Litigation Paralegal who joined BLB&G in August 2019. She is a Notary Public and part of the Firm's diversity committee. Prior to joining BLB&G, Ms. Rodriguez worked as a paralegal at Lazare Potter Giacovas & Moyle LLP for eight years and at Malik & Associates, P.C. for six years. She is a CORE Registered Paralegal with National Federation of Paralegal Associations, Inc. and graduate of St. John's University, where she received a degree in Legal Studies.

Role in Symantec Litigation: Ms. Rodriguez provided support and assistance to the attorneys in their prosecution of this action by gathering documents and information requested by the attorneys, assisting with Court filings, cite checking briefs and other filings, and organizing potential deposition exhibits.

Rate Information: Ms. Rodriguez's hourly rate is \$325. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Ms. Rodriguez's rate is comparable to prevailing rates for paralegals with similar experience and qualifications.

LITIGATION SUPPORT

Johanna Pitcairn (nee Agou-Bracco), eDiscovery Services Project Manager

Qualifications & Experience: Johanna Pitcairn has been a Project Manager in the eDiscovery Services department since January 2019. She has dedicated her career to mastering the technical and evolving eDiscovery tools and workflows, and has become a certified Relativity Master in 2020.

Johanna earned her LL.M. from Hofstra University, and has been admitted to practice law in New York since 2008.

Role in Symantec Litigation: Ms. Agou-Bracco assisted with loading and maintaining the searchable databases on which documents produced by Defendants and third parties were maintained.

Rate Information: Ms. Agou-Bracco's hourly rate is \$400. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Ms. Agou-Bracco's rate is comparable to prevailing rates for e-discovery project managers with similar experience and qualifications.

MANAGING CLERK

Mahiri Buffong, Managing Clerk

Qualifications & Experience: Mahiri P. Buffong is the BLB&G's Managing Clerk. He started with BLB&G in January 2019 and previously worked at Orrick Herrington & Sutcliffe LLP as the Managing Clerk.

Role in Symantec Litigation: Mr. Buffong was responsible for electronically filing documents with the Court and ensuring that all such filings conformed with the local rules, procedures, and e-filing requirements.

Rate Information: Mr. Buffong's hourly rate is \$375. Based on Lead Counsel's review and analysis of court-approved fees and other publicly available information, Mr. Buffong's rate is comparable to prevailing rates for managing clerks with similar experience and qualifications.

Exhibit 6



Bernstein Litowitz Berger & Grossmann LLP
Attorneys at Law

Firm Resume

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Since our founding in 1983, Bernstein Litowitz Berger & Grossmann LLP has obtained many of the largest monetary recoveries in history—over \$33 billion on behalf of investors. Unique among our peers, the firm has obtained the largest settlements ever agreed to by public companies related to securities fraud, including four of the ten largest in history. Working with our clients, we have also used the litigation process to achieve precedent-setting reforms which have increased market transparency, held wrongdoers accountable and improved corporate business practices in groundbreaking ways.

Firm Overview

Bernstein Litowitz Berger & Grossmann LLP (BLB&G), a national law firm with offices located in New York, California, Delaware, Louisiana, and Illinois, prosecutes class and private actions on behalf of individual and institutional clients. The firm's litigation practice areas include securities class and direct actions in federal and state courts; corporate governance and shareholder rights litigation, including claims for breach of fiduciary duty and proxy violations; mergers and acquisitions and transactional litigation; alternative dispute resolution; and distressed debt and bankruptcy. We also handle, on behalf of major institutional clients and lenders, more general complex commercial litigation involving allegations of breach of contract, accountants' liability, breach of fiduciary duty, fraud, and negligence.

We are the nation's leading firm representing institutional investors in securities fraud class action litigation. The firm's institutional client base includes U.S. public pension funds the New York State Common Retirement Fund; the California Public Employees' Retirement System (CalPERS); the Los Angeles County Employees Retirement Association (LACERA); the Chicago Municipal, Police and Labor Retirement Systems; the Teacher Retirement System of Texas; the Arkansas Teacher Retirement System; the Florida State Board of Administration; the Public Employees' Retirement System of Mississippi; the New York State Teachers' Retirement System; the Ohio Public Employees Retirement System; the State Teachers Retirement System of Ohio; the Oregon Public Employees Retirement System; the Virginia Retirement System; the Louisiana School, State, Teachers and Municipal Police Retirement Systems; the Public School Teachers' Pension and Retirement Fund of Chicago; the New Jersey Division of Investment of the Department of the Treasury; TIAA-CREF and other private institutions; as well as numerous other public and Taft-Hartley pension entities. Our European client base includes APG; Aegon AM; ATP; Blue Sky Group; Hermes IM; Robeco; SEB; Handelsbanken; Nykredit; PGB; and PGGM, among others.

More Top Securities Recoveries

Since its founding in 1983, BLB&G has prosecuted some of the most complex cases in history and has obtained over \$33 billion on behalf of investors. Unique among its peers, the firm has negotiated and obtained many of the largest securities class action recoveries in history, including:

- *In re WorldCom, Inc. Securities Litigation* – \$6.19 billion recovery
- *In re Cendant Corporation Securities Litigation* – \$3.3 billion recovery

- *In re Bank of America Corp. Securities, Derivative, and Employee Retirement Income Security Act (ERISA) Litigation* – \$2.43 billion recovery
- *In re Nortel Networks Corporation Securities Litigation (Nortel II)* – \$1.07 billion recovery
- *In re Merck & Co., Inc. Securities Litigation* – \$1.06 billion recovery
- *In re McKesson HBOC, Inc. Securities Litigation* – \$1.05 billion recovery

Based on our record of success, BLB&G has been at the top of the rankings by ISS Securities Class Action Services (ISS-SCAS), a leading industry research publication that provides independent and objective third-party analysis and statistics on securities-litigation law firms, since its inception. In its most recent report, [*Top 100 U.S. Class Action Settlements of All-Time*](#), ISS-SCAS once again ranked BLB&G as the top firm in the field for the eleventh year in a row. BLB&G has served as lead or co-lead counsel in 38 of the ISS-SCAS's top 100 U.S. securities-fraud settlements—more than twice as many as any other firm—and recovered over \$26 billion for investors in those cases, nearly \$10 billion more than any other plaintiffs' securities firm.

Giving Shareholders a Voice and Changing Business Practices for the Better

BLB&G was among the first law firms ever to obtain meaningful corporate governance reforms through litigation. In courts throughout the country, we prosecute shareholder class and derivative actions, asserting claims for breach of fiduciary duty and proxy violations wherever the conduct of corporate officers and/or directors, or M&A transactions, seek to deprive shareholders of fair value, undermine shareholder voting rights, or allow management to profit at the expense of shareholders.

We have prosecuted seminal cases establishing precedent which has increased market transparency, held wrongdoers accountable, addressed issues in the boardroom and executive suite, challenged unfair deals, and improved corporate business practices in groundbreaking ways.

From setting new standards of director independence, to restructuring board practices in the wake of persistent illegal conduct; from challenging the improper use of defensive measures and deal protections for management's benefit, to confronting stock options backdating abuses and other self-dealing by executives; we have confronted a variety of questionable, unethical and proliferating corporate practices. Seeking to reform faulty management structures and address breaches of fiduciary duty by corporate officers and directors, we have obtained unprecedented victories on behalf of shareholders seeking to improve governance and protect the shareholder franchise.

Practice Areas

Securities Fraud Litigation

Securities fraud litigation is the cornerstone of the firm's litigation practice. Since its founding, the firm has had the distinction of having tried and prosecuted many of the most high-profile securities fraud class actions in history, recovering billions of dollars and obtaining unprecedented corporate governance reforms on behalf of our clients. BLB&G continues to play a leading role in major securities litigation pending in federal and state courts, and the firm remains one of the nation's leaders in representing institutional investors in securities fraud class litigation.

The firm also pursues direct actions in securities fraud cases when appropriate. By selectively opting out of certain securities class actions, we seek to resolve our clients' claims efficiently and for substantial multiples of what they might otherwise recover from related class action settlements.

Our attorneys have extensive experience in the laws that regulate the securities markets and in the disclosure requirements of corporations that issue publicly traded securities. Many also have accounting backgrounds. The group has access to state-of-the-art, online financial wire services and databases, which enable it to instantaneously investigate any potential securities fraud action involving a public company's debt and equity securities. Biographies for our attorneys can be accessed on the firm's website by clicking [here](#).

Corporate Governance and Shareholder Rights

Our Corporate Governance and Shareholder Rights attorneys prosecute derivative actions, claims for breach of fiduciary duty, and proxy violations on behalf of individual and institutional investors in state and federal courts throughout the country. We have prosecuted actions challenging numerous highly publicized corporate transactions which violated fair process, fair price, and the applicability of the business judgment rule, and have also addressed issues of corporate waste, shareholder voting rights claims, and executive compensation.

Our attorneys have prosecuted numerous cases regarding the improper "backdating" of executive stock options which resulted in windfall undisclosed compensation to executives at the direct expense of shareholders—and returned hundreds of millions of dollars to company coffers. We also represent institutional clients in lawsuits seeking to enforce fiduciary obligations in connection with Mergers & Acquisitions and "Going Private" transactions that deprive shareholders of fair value when participants buy companies from their public shareholders "on the cheap." Although enough shareholders accept the consideration offered for the transaction to close, many sophisticated investors correctly recognize and ultimately enjoy the increased returns to be obtained by pursuing appraisal rights and demanding that courts assign a "true value" to the shares taken private in these transactions.

Our attorneys are well versed in changing SEC rules and regulations on corporate governance issues and have a comprehensive understanding of a wide variety of corporate law transactions and both substantive and courtroom expertise in the specific legal areas involved. As a result of the firm's high-profile and widely recognized capabilities, our attorneys are increasingly in demand with institutional investors who are exercising a more assertive voice with corporate boards regarding corporate governance issues and the boards' accountability to shareholders.

Distressed Debt and Bankruptcy

BLB&G has obtained billions of dollars through litigation on behalf of bondholders and creditors of distressed and bankrupt companies, as well as through third-party litigation brought by bankruptcy trustees and creditors' committees against auditors, appraisers, lawyers, officers and directors, and other defendants who may have contributed to client losses. As counsel, we advise institutions and individuals nationwide in developing strategies and tactics to recover assets presumed lost as a result of bankruptcy. Our record in this practice area is characterized by extensive trial experience in addition to successful settlements.

Commercial Litigation

BLB&G provides contingency fee representation in complex business litigation and has obtained substantial recoveries on behalf of investors, corporations, bankruptcy trustees, creditor committees, and other business entities. We have faced down the most powerful and well-funded law firms and defendants in the country—and consistently prevailed. For example, on behalf of the bankruptcy trustee, the firm prosecuted *BFA Liquidation Trust v. Arthur Andersen*, arising from the largest nonprofit bankruptcy in U.S. history. After two years of litigation and a week-long trial, the firm obtained a \$217 million recovery from Andersen for the Trust. Combined with other recoveries, the total amounted to more than 70 percent of the Trust's losses.

Having obtained huge recoveries with nominal out-of-pocket expenses and fees of less than 20 percent, we have repeatedly demonstrated that valuable claims are best prosecuted by a first-rate litigation firm on a contingent basis at negotiated percentages. Legal representation need not compound the risk and high cost inherent in today's complex and competitive business environment. We are paid only if we (and our clients) win. The result: the highest quality legal representation at a fair price.

Alternative Dispute Resolution

BLB&G offers clients an accomplished team and a creative venue in which to resolve conflicts outside of the litigation process. We have experience in U.S. and international disputes and our attorneys have led complex business-to-business arbitrations and mediations domestically and abroad representing clients before all the major arbitration tribunals, including the American Arbitration Association, FINRA, JAMS, International Chamber of Commerce, and the London Court of International Arbitration.

Our lawyers have successfully arbitrated cases that range from complex business-to-business disputes to individuals' grievances with employers. It is our experience that in some cases, a well-executed arbitration process can resolve disputes faster, with limited appeals and with a higher level of confidentiality than public litigation.

In the wake of the credit crisis, for example, we successfully represented numerous former executives of a major financial institution in arbitrations relating to claims for compensation. We have also assisted clients with disputes involving failure to honor compensation commitments, disputes over the purchase of securities, businesses seeking compensation for uncompleted contracts, and unfulfilled financing commitments.

Feedback from The Courts

Throughout the firm's history, many courts have recognized the professional excellence and diligence of the firm and its members. A few examples are set forth below.

In re WorldCom, Inc. Securities Litigation

- The Honorable Denise Cote of the United States District Court for the Southern District of New York

"I have the utmost confidence in plaintiffs' counsel...they have been doing a superb job...The Class is extraordinarily well represented in this litigation."

"The magnitude of this settlement is attributable in significant part to Lead Counsel's advocacy and energy...The quality of the representation given by Lead Counsel...has been superb...and is unsurpassed in this Court's experience with plaintiffs' counsel in securities litigation."

"Lead Counsel has been energetic and creative...Its negotiations with the Citigroup Defendants have resulted in a settlement of historic proportions."

* * *

In re Clarent Corporation Securities Litigation

- The Honorable Charles R. Breyer of the United States District Court for the Northern District of California

"It was the best tried case I've witnessed in my years on the bench...."

"[A]n extraordinarily civilized way of presenting the issues to you [the jury]...We've all been treated to great civility and the highest professional ethics in the presentation of the case..."

"These trial lawyers are some of the best I've ever seen."

* * *

Landry's Restaurants, Inc. Shareholder Litigation

- Vice Chancellor J. Travis Laster of the Delaware Court of Chancery

"I do want to make a comment again about the excellent efforts...put into this case...This case, I think, shows precisely the type of benefits that you can achieve for stockholders and how representative litigation can be a very important part of our corporate governance system...you hold up this case as an example of what to do."

* * *

McCall V. Scott (Columbia/HCA Derivative Litigation)

- The Honorable Thomas A. Higgins of the United States District Court for the Middle District of Tennessee

"Counsel's excellent qualifications and reputations are well documented in the record, and they have litigated this complex case adeptly and tenaciously throughout the six years it has been pending. They assumed an enormous risk and have shown great patience by taking this case on a contingent basis, and despite an early setback they have persevered and brought about not only a large cash settlement but sweeping corporate reforms that may be invaluable to the beneficiaries."

Significant Recoveries

BLB&G is counsel in many diverse nationwide class and individual actions and has obtained many of the largest and most significant recoveries in history. The firm has successfully identified, investigated, and prosecuted many of the most significant securities and shareholder actions in history, recovering billions of dollars on behalf of defrauded investors and obtaining groundbreaking corporate-governance reforms. These resolutions include six recoveries of over \$1 billion, more than any other firm in our field. Examples of cases with our most significant recoveries include:

Securities Class Actions

Case: *In re WorldCom, Inc. Securities Litigation*

Court: United States District Court for the Southern District of New York

Highlights: \$6.19 billion securities fraud class action recovery—the second largest in history; unprecedented recoveries from Director Defendants.

Case Summary: Investors suffered massive losses in the wake of the financial fraud and subsequent bankruptcy of former telecom giant WorldCom, Inc. This litigation alleged that WorldCom and others disseminated false and misleading statements to the investing public regarding its earnings and financial condition in violation of the federal securities and other laws. It further alleged a nefarious relationship between Citigroup subsidiary Salomon Smith Barney and WorldCom, carried out primarily by Salomon employees involved in providing investment banking services to WorldCom, and by WorldCom's former CEO and CFO. As Court-appointed Co-Lead Counsel representing Lead Plaintiff the New York State Common Retirement Fund, we obtained unprecedented settlements totaling more than \$6 billion from the Investment Bank Defendants who underwrote WorldCom bonds, including a \$2.575 billion cash settlement to settle all claims against the Citigroup Defendants. On the eve of trial, the 13 remaining "Underwriter Defendants," including J.P. Morgan Chase, Deutsche Bank and Bank of America, agreed to pay settlements totaling nearly \$3.5 billion to resolve all claims against them. Additionally, the day before trial was scheduled to begin, all of the former WorldCom Director Defendants agreed to pay over \$60 million to settle the claims against them. An unprecedented first for outside directors, \$24.75 million of that amount came out of the pockets of the individuals—20% of their collective net worth. *The Wall Street Journal*, in its coverage, profiled the settlement as having "shaken Wall Street, the audit profession and corporate boardrooms." After four weeks of trial, Arthur Andersen, WorldCom's former auditor, settled for \$65 million. Subsequent settlements were reached with the former executives of WorldCom, and then with Andersen, bringing the total obtained for the Class to over \$6.19 billion.

- Case:** *In re Cendant Corporation Securities Litigation*
- Court:** United States District Court for the District of New Jersey
- Highlights:** \$3.3 billion securities fraud class action recovery – the third largest in history; significant corporate governance reforms obtained.
- Summary:** The firm was Co-Lead Counsel in this class action against Cendant Corporation, its officers and directors and Ernst & Young (E&Y), its auditors, for their role in disseminating materially false and misleading financial statements concerning the company’s revenues, earnings and expenses for its 1997 fiscal year. As a result of company-wide accounting irregularities, Cendant restated its financial results for its 1995, 1996, and 1997 fiscal years and all fiscal quarters therein. Cendant agreed to settle the action for \$2.8 billion and to adopt some of the most extensive corporate governance changes in history. E&Y settled for \$335 million. These settlements remain the largest sums ever recovered from a public company and a public accounting firm through securities class action litigation. BLB&G represented Lead Plaintiffs CalPERS (the California Public Employees’ Retirement System), the New York State Common Retirement Fund and the New York City Pension Funds, the three largest public pension funds in America, in this action.
- Case:** *In re Bank of America Corp. Securities, Derivative, and Employee Retirement Income Security Act (ERISA) Litigation*
- Court:** United States District Court for the Southern District of New York
- Highlights:** \$2.425 billion in cash; significant corporate governance reforms to resolve all claims. This recovery is by far the largest shareholder recovery related to the subprime meltdown and credit crisis; the single largest securities class action settlement ever resolving a Section 14(a) claim—the federal securities provision designed to protect investors against misstatements in connection with a proxy solicitation; the largest ever funded by a single corporate defendant for violations of the federal securities laws; the single largest settlement of a securities class action in which there was neither a financial restatement involved nor a criminal conviction related to the alleged misconduct; and one of the 10 largest securities class action recoveries in history.
- Summary:** The firm represented Co-Lead Plaintiffs the State Teachers Retirement System of Ohio, the Ohio Public Employees Retirement System, and the Teacher Retirement System of Texas in this securities class action filed on behalf of shareholders of Bank of America Corporation (BAC) arising from BAC’s 2009 acquisition of Merrill Lynch & Co., Inc. The action alleges that BAC, Merrill Lynch, and certain of the companies’ current and former officers and directors violated the federal securities laws by making a series of materially false statements and omissions in connection with the acquisition. These violations included the alleged failure to disclose information regarding billions of dollars of losses which Merrill had suffered before the BAC shareholder vote on the proposed acquisition, as well as an undisclosed agreement allowing Merrill to pay billions in bonuses before the acquisition closed despite these losses. Not privy to these material facts, BAC shareholders voted to approve the acquisition.

- Case:** *In re Nortel Networks Corporation Securities Litigation (Nortel II)*
- Court:** United States District Court for the Southern District of New York
- Highlights:** Over \$1.07 billion in cash and common stock recovered for the class.
- Summary:** This securities fraud class action charged Nortel Networks Corporation and certain of its officers and directors with violations of the Securities Exchange Act of 1934, alleging that the Defendants knowingly or recklessly made false and misleading statements with respect to Nortel's financial results during the relevant period. BLB&G clients the Ontario Teachers' Pension Plan Board and the Treasury of the State of New Jersey and its Division of Investment were appointed as Co-Lead Plaintiffs for the Class in one of two related actions (Nortel II), and BLB&G was appointed Lead Counsel for the Class. In a historic settlement, Nortel agreed to pay \$2.4 billion in cash and Nortel common stock to resolve both matters. Nortel later announced that its insurers had agreed to pay \$228.5 million toward the settlement, bringing the total amount of the global settlement to approximately \$2.7 billion, and the total amount of the Nortel II settlement to over \$1.07 billion.
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- Case:** *In re Merck & Co., Inc. Securities Litigation*
- Court:** United States District Court, District of New Jersey
- Highlights:** \$1.06 billion recovery for the class.
- Summary:** This case arises out of misrepresentations and omissions concerning life-threatening risks posed by the "blockbuster" COX-2 painkiller Vioxx, which Merck withdrew from the market in 2004. In January 2016, BLB&G achieved a \$1.062 billion settlement on the eve of trial after more than 12 years of hard-fought litigation that included a successful decision at the United States Supreme Court. This settlement is the second-largest recovery ever obtained in the Third Circuit, one of the top 11 securities recoveries of all time, and the largest securities recovery ever achieved against a pharmaceutical company. BLB&G represented Lead Plaintiff the Public Employees' Retirement System of Mississippi.
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- Case:** *In re McKesson HBOC, Inc. Securities Litigation*
- Court:** United States District Court for the Northern District of California
- Highlights:** \$1.05 billion recovery for the class.
- Summary:** This securities fraud litigation was filed on behalf of purchasers of HBOC, McKesson, and McKesson HBOC securities, alleging that Defendants misled the investing public concerning HBOC's and McKesson HBOC's financial results. On behalf of Lead Plaintiff the New York State Common Retirement Fund, BLB&G obtained a \$960 million settlement from the company; \$72.5 million in cash from Arthur Andersen; and, on the eve of trial, a \$10 million settlement from Bear Stearns & Co. Inc., with total recoveries reaching more than \$1 billion.

Case: *HealthSouth Corporation Bondholder Litigation*

Court: United States District Court for the Northern District of Alabama

Highlights: \$804.5 million in total recoveries.

Summary: In this litigation, BLB&G was the appointed Co-Lead Counsel for the bond holder class, representing Lead Plaintiff the Retirement Systems of Alabama. This action arose from allegations that Birmingham, Alabama based HealthSouth Corporation overstated its earnings at the direction of its founder and former CEO Richard Scrushy. Subsequent revelations disclosed that the overstatement actually exceeded over \$2.4 billion, virtually wiping out all of HealthSouth's reported profits for the prior five years. A total recovery of \$804.5 million was obtained in this litigation through a series of settlements, including an approximately \$445 million settlement for shareholders and bondholders, a \$100 million in cash settlement from UBS AG, UBS Warburg LLC, and individual UBS Defendants, and \$33.5 million in cash from the company's auditor. The total settlement for injured HealthSouth bond purchasers exceeded \$230 million, recouping over a third of bond purchaser damages.

Case: *In re Washington Public Power Supply System Litigation*

Court: United States District Court for the District of Arizona

Highlights: Over \$750 million—the largest securities fraud settlement ever achieved at the time.

Summary: BLB&G was appointed Chair of the Executive Committee responsible for litigating on behalf of the class in this action. The case was litigated for over seven years, and involved an estimated 200 million pages of documents produced in discovery; the depositions of 285 fact witnesses and 34 expert witnesses; more than 25,000 introduced exhibits; six published district court opinions; seven appeals or attempted appeals to the Ninth Circuit; and a three-month jury trial, which resulted in a settlement of over \$750 million—then the largest securities fraud settlement ever achieved.

Case: *In re Lehman Brothers Equity/Debt Securities Litigation*

Court: United States District Court for the Southern District of New York

Highlights: \$735 million in total recoveries.

Summary: Representing the Government of Guam Retirement Fund, BLB&G successfully prosecuted this securities class action arising from Lehman Brothers Holdings Inc.'s issuance of billions of dollars in offerings of debt and equity securities that were sold using offering materials that contained untrue statements and missing material information.

After four years of intense litigation, Lead Plaintiffs achieved a total of \$735 million in recoveries consisting of: a \$426 million settlement with underwriters of Lehman securities offerings; a \$90 million settlement with former Lehman directors and officers; a \$99 million settlement that resolves claims against Ernst & Young, Lehman's former auditor (considered one of the top 10 auditor settlements ever achieved); and a \$120 million settlement that resolves claims against UBS Financial

Services, Inc. This recovery is truly remarkable not only because of the difficulty in recovering assets when the issuer defendant is bankrupt, but also because no financial results were restated, and the auditors never disavowed the statements.

Case: *In re Citigroup, Inc. Bond Action Litigation*

Court: United States District Court for the Southern District of New York

Highlights: \$730 million cash recovery; second largest recovery in a litigation arising from the financial crisis.

Summary: In the years prior to the collapse of the subprime mortgage market, Citigroup issued 48 offerings of preferred stock and bonds. This securities fraud class action was filed on behalf of purchasers of Citigroup bonds and preferred stock alleging that these offerings contained material misrepresentations and omissions regarding Citigroup's exposure to billions of dollars in mortgage-related assets, the loss reserves for its portfolio of high-risk residential mortgage loans, and the credit quality of the risky assets it held in off-balance sheet entities known as "structured investment vehicles." After protracted litigation lasting four years, we obtained a \$730 million cash recovery—the second largest securities class action recovery in a litigation arising from the financial crisis, and the second largest recovery ever in a securities class action brought on behalf of purchasers of debt securities. As Lead Bond Counsel for the Class, BLB&G represented Lead Bond Plaintiffs Minneapolis Firefighters' Relief Association, Louisiana Municipal Police Employees' Retirement System, and Louisiana Sheriffs' Pension and Relief Fund.

Case: *In re Schering-Plough Corporation/Enhance Securities Litigation; In re Merck & Co., Inc. Vytarin/Zetia Securities Litigation*

Court: United States District Court for the District of New Jersey

Highlights: \$688 million in combined settlements (Schering-Plough settled for \$473 million; Merck settled for \$215 million) in this coordinated securities fraud litigations filed on behalf of investors in Merck and Schering-Plough.

Summary: After nearly five years of intense litigation, just days before trial, BLB&G resolved the two actions against Merck and Schering-Plough, which stemmed from claims that Merck and Schering artificially inflated their market value by concealing material information and making false and misleading statements regarding their blockbuster anti-cholesterol drugs Zetia and Vytarin. Specifically, we alleged that the companies knew that their "ENHANCE" clinical trial of Vytarin (a combination of Zetia and a generic) demonstrated that Vytarin was no more effective than the cheaper generic at reducing artery thickness. The companies nonetheless championed the "benefits" of their drugs, attracting billions of dollars of capital. When public pressure to release the results of the ENHANCE trial became too great, the companies reluctantly announced these negative results, which we alleged led to sharp declines in the value of the companies' securities, resulting in significant losses to investors. The combined \$688 million in settlements (Schering-Plough settled for \$473 million; Merck settled for \$215 million) is the second largest securities recovery ever in the Third Circuit, among the top 25

settlements of all time, and among the ten largest recoveries ever in a case where there was no financial restatement. BLB&G represented Lead Plaintiffs Arkansas Teacher Retirement System, the Public Employees' Retirement System of Mississippi, and the Louisiana Municipal Police Employees' Retirement System.

Case: *In re Lucent Technologies, Inc. Securities Litigation*

Court: United States District Court for the District of New Jersey

Highlights: \$667 million in total recoveries; the appointment of BLB&G as Co-Lead Counsel is especially noteworthy as it marked the first time since the 1995 passage of the Private Securities Litigation Reform Act that a court reopened the lead plaintiff or lead counsel selection process to account for changed circumstances, new issues, and possible conflicts between new and old allegations.

Summary: BLB&G served as Co-Lead Counsel in this securities class action, representing Lead Plaintiffs the Parnassus Fund, Teamsters Locals 175 & 505 D&P Pension Trust, Anchorage Police and Fire Retirement System, and the Louisiana School Employees' Retirement System. The complaint accused Lucent of making false and misleading statements to the investing public concerning its publicly reported financial results and failing to disclose the serious problems in its optical networking business. When the truth was disclosed, Lucent admitted that it had improperly recognized revenue of nearly \$679 million in fiscal 2000. The settlement obtained in this case is valued at approximately \$667 million, and is composed of cash, stock, and warrants.

Case: *In re Wachovia Preferred Securities and Bond/Notes Litigation*

Court: United States District Court for the Southern District of New York

Highlights: \$627 million recovery—among the largest securities class action recoveries in history; third-largest recovery obtained in an action arising from the subprime mortgage crisis.

Summary: This securities class action was filed on behalf of investors in certain Wachovia bonds and preferred securities against Wachovia Corp., certain former officers and directors, various underwriters, and its auditor, KPMG LLP. The case alleged that Wachovia provided offering materials that misrepresented and omitted material facts concerning the nature and quality of Wachovia's multibillion-dollar option-ARM (adjustable rate mortgage) "Pick-A-Pay" mortgage loan portfolio, and that Wachovia's loan loss reserves were materially inadequate. According to the Complaint, these undisclosed problems threatened the viability of the financial institution, requiring it to be "bailed out" during the financial crisis before it was acquired by Wells Fargo. The combined \$627 million recovery obtained in the action is among the 20 largest securities class action recoveries in history, the largest settlement ever in a class action case asserting only claims under the Securities Act of 1933, and one of a handful of securities class action recoveries obtained where there were no parallel civil or criminal actions brought by government authorities. The firm represented Co-Lead Plaintiffs Orange County Employees Retirement System and Louisiana Sheriffs' Pension and Relief Fund in this action.

- Case:** *Bear Stearns Mortgage Pass-Through Litigation*
- Court:** United States District Court for the Southern District of New York
- Highlights:** \$500 million recovery—the largest recovery ever on behalf of purchasers of residential mortgage-backed securities.
- Summary:** BLB&G served as Co-Lead Counsel in this securities action, representing Lead Plaintiffs the Public Employees' Retirement System of Mississippi. The case alleged that Bear Stearns & Company, Inc. sold mortgage pass-through certificates using false and misleading offering documents. The offering documents contained false and misleading statements related to, among other things, (1) the underwriting guidelines used to originate the mortgage loans underlying the certificates; and (2) the accuracy of the appraisals for the properties underlying the certificates. After six years of hard-fought litigation and extensive arm's-length negotiations, the \$500 million recovery is the largest settlement in a U.S. class action against a bank that packaged and sold mortgage securities at the center of the 2008 financial crisis.
- Case:** *Gary Hefler et al. v. Wells Fargo & Company et al.*
- Court:** United States District Court for the Northern District of California
- Highlights:** \$480 million recovery—the fourth largest securities settlement ever achieved in the Ninth Circuit and the 32nd largest securities settlement ever in the United States.
- Summary:** BLB&G served as Lead Counsel for the Court-appointed Lead Plaintiff Union Asset Management Holding, AG in this action, which alleged that Wells Fargo and certain current and former officers and directors of Wells Fargo made a series of materially false statements and omissions in connection with Wells Fargo's secret creation of fake or unauthorized client accounts in order to hit performance-based compensation goals. After years of presenting a business driven by legitimate growth prospects, U.S. regulators revealed in September 2016 that Wells Fargo employees were secretly opening millions of potentially unauthorized accounts for existing Wells Fargo customers. The Complaint alleged that these accounts were opened in order to hit performance targets and inflate the "cross-sell" metrics that investors used to measure Wells Fargo's financial health and anticipated growth. When the market learned the truth about Wells Fargo's violation of its customers' trust and failure to disclose reliable information to its investors, the price of Wells Fargo's stock dropped, causing substantial investor losses.
- Case:** *Ohio Public Employees Retirement System v. Freddie Mac*
- Court:** United States District Court for the Southern District of Ohio
- Highlights:** \$410 million settlement.
- Summary:** This securities fraud class action was filed on behalf of the Ohio Public Employees Retirement System and the State Teachers Retirement System of Ohio alleging that Federal Home Loan Mortgage Corporation (Freddie Mac) and certain of its current and former officers issued false and misleading

statements in connection with the company's previously reported financial results. Specifically, the Complaint alleged that the Defendants misrepresented the company's operations and financial results by having engaged in numerous improper transactions and accounting machinations that violated fundamental GAAP precepts in order to artificially smooth the company's earnings and to hide earnings volatility. In connection with these improprieties, Freddie Mac restated more than \$5 billion in earnings. A settlement of \$410 million was reached in the case just as deposition discovery had begun and document review was complete.

Case: *In re Refco, Inc. Securities Litigation*

Court: United States District Court for the Southern District of New York

Highlights: Over \$407 million in total recoveries.

Summary: The lawsuit arises from the revelation that Refco, a once prominent brokerage, had for years secreted hundreds of millions of dollars of uncollectible receivables with a related entity controlled by Phillip Bennett, the company's Chairman and Chief Executive Officer. This revelation caused the stunning collapse of the company a mere two months after its initial public offering of common stock. As a result, Refco filed one of the largest bankruptcies in U.S. history. Settlements have been obtained from multiple company and individual defendants, resulting in a total recovery for the class of over \$407 million. BLB&G represented Co-Lead Plaintiff RH Capital Associates LLC.

Case: *In re Allergan, Inc. Proxy Violation Securities Litigation*

Court: United States District Court for the Central District of California

Highlights: Litigation recovered over \$250 million for investors while challenging an unprecedented insider trading scheme by billionaire hedge fund manager Bill Ackman.

Summary: As alleged in groundbreaking litigation, billionaire hedge fund manager Bill Ackman and his Pershing Square Capital Management fund secretly acquired a near 10% stake in pharmaceutical concern Allergan, Inc. as part of an unprecedented insider trading scheme by Ackman and Valeant Pharmaceuticals International, Inc. What Ackman knew—but investors did not—was that in the ensuing weeks, Valeant would be launching a hostile bid to acquire Allergan shares at a far higher price. Ackman enjoyed a massive instantaneous profit upon public news of the proposed acquisition, and the scheme worked for both parties as he kicked back hundreds of millions of his insider-trading proceeds to Valeant after Allergan agreed to be bought by a rival bidder. After a ferocious three-year legal battle over this attempt to circumvent the spirit of the U.S. securities laws, BLB&G obtained a \$250 million settlement for Allergan investors, and created precedent to prevent similar such schemes in the future. The Plaintiffs in this action were the State Teachers Retirement System of Ohio, the Iowa Public Employees Retirement System, and Patrick T. Johnson.

Corporate Governance and Shareholders' Rights

Case: *City of Monroe Employees' Retirement System, Derivatively on Behalf of Twenty-First Century Fox, Inc. v. Rupert Murdoch, et al.*

Court: Delaware Court of Chancery

Highlights: Landmark derivative litigation established unprecedented, independent Board-level council to ensure employees are protected from workplace harassment while recouping \$90 million for the company's coffers.

Summary: Before the birth of the #metoo movement, BLB&G led the prosecution of an unprecedented shareholder derivative litigation against Fox News parent 21st Century Fox, Inc. arising from the systemic sexual and workplace harassment at the embattled network. After nearly 18 months of litigation, discovery and negotiation related to the shocking misconduct and the Board's extensive alleged governance failures, the parties unveil a landmark settlement with two key components: 1) the first ever Board-level watchdog of its kind—the "Fox News Workplace Professionalism and Inclusion Council" of experts (WPIC)—majority independent of the Murdochs, the Company and Board; and 2) one of the largest financial recoveries—\$90 million—ever obtained in a pure corporate board oversight dispute. The WPIC serves as a model for public companies in all industries. The firm represented 21st Century Fox shareholder the City of Monroe (Michigan) Employees' Retirement System.

Case: *In re McKesson Corporation Derivative Litigation*

Court: United States District Court, Northern District of California, Oakland Division and Delaware Chancery Court

Highlights: Litigation recovered \$175 million and achieved substantial corporate governance reforms.

Summary: BLB&G represented the Police & Fire Retirement System City of Detroit and Amalgamated Bank in this derivative class action arising from the company's role in permitting and exacerbating America's ongoing opioid crisis. The complaint, initially filed in Delaware Chancery Court, alleged that defendants breached their fiduciary duties by failing to adequately oversee McKesson's compliance with provisions of the Controlled Substances Act and a series of settlements with the Drug Enforcement Administration intended to regulate the distribution and misuse of controlled substances such as opioids. Even after paying fines and settlements in the hundreds of millions of dollars, McKesson was sued in the National Opioid Multidistrict Litigation. In May 2018, our clients joined a substantially similar action being litigated in California federal court. Acting as co-lead counsel, BLB&G played a major role in litigating the case, opposing a motion to stay the action by a special litigation committee, and engaging in extensive pretrial discovery. Ultimately, \$175 million was recovered for the benefit of McKesson's shareholders in a settlement that also created substantial corporate-governance reforms to prevent a recurrence of McKesson's inadequate legal compliance efforts.

- Case:** *UnitedHealth Group, Inc. Shareholder Derivative Litigation*
- Court:** United States District Court for the District of Minnesota
- Highlights:** Litigation recovered over \$920 million in ill-gotten compensation directly from former officers for their roles in illegally backdating stock options, while the company agreed to far-reaching reforms aimed at curbing future executive compensation abuses.
- Summary:** This shareholder derivative action filed against certain current and former executive officers and members of the Board of Directors of UnitedHealth Group, Inc. alleged that the Defendants obtained, approved and/or acquiesced in the issuance of stock options to senior executives that were unlawfully backdated to provide the recipients with windfall compensation at the direct expense of UnitedHealth and its shareholders. The firm recovered over \$920 million in ill-gotten compensation directly from the former officer Defendants—the largest derivative recovery in history. As feature coverage in *The New York Times* indicated, “investors everywhere should applaud [the UnitedHealth settlement]....[T]he recovery sets a standard of behavior for other companies and boards when performance pay is later shown to have been based on ephemeral earnings.” The Plaintiffs in this action were the St. Paul Teachers’ Retirement Fund Association, the Public Employees’ Retirement System of Mississippi, the Jacksonville Police & Fire Pension Fund, the Louisiana Sheriffs’ Pension & Relief Fund, the Louisiana Municipal Police Employees’ Retirement System and Fire & Police Pension Association of Colorado.
- Case:** *Caremark Merger Litigation*
- Court:** Delaware Court of Chancery – New Castle County
- Highlights:** Landmark Court ruling ordered Caremark’s board to disclose previously withheld information, enjoined a shareholder vote on the CVS merger offer, and granted statutory appraisal rights to Caremark shareholders. The litigation ultimately forced CVS to raise its offer by \$7.50 per share, equal to more than \$3.3 billion in additional consideration to Caremark shareholders.
- Summary:** Commenced on behalf of the Louisiana Municipal Police Employees’ Retirement System and other shareholders of Caremark RX, Inc., this shareholder class action accused the company’s directors of violating their fiduciary duties by approving and endorsing a proposed merger with CVS Corporation, all the while refusing to fairly consider an alternative transaction proposed by another bidder. In a landmark decision, the Court ordered the Defendants to disclose material information that had previously been withheld, enjoined the shareholder vote on the CVS transaction until the additional disclosures occurred, and granted statutory appraisal rights to Caremark’s shareholders—forcing CVS to increase the consideration offered to shareholders by \$7.50 per share in cash (over \$3 billion in total).

- Case:** *In re Pfizer Inc. Shareholder Derivative Litigation*
- Court:** United States District Court for the Southern District of New York
- Highlights:** Landmark settlement in which Defendants agreed to create a new Regulatory and Compliance Committee of the Pfizer Board to be supported by a dedicated \$75 million fund.
- Summary:** In the wake of Pfizer's agreement to pay \$2.3 billion as part of a settlement with the U.S. Department of Justice to resolve civil and criminal charges relating to the illegal marketing of at least 13 of the company's most important drugs (the largest such fine ever imposed), this shareholder derivative action was filed against Pfizer's senior management and Board alleging they breached their fiduciary duties to Pfizer by, among other things, allowing unlawful promotion of drugs to continue after receiving numerous "red flags" that Pfizer's improper drug marketing was systemic and widespread. The suit was brought by Court-appointed Lead Plaintiffs Louisiana Sheriffs' Pension and Relief Fund and Skandia Life Insurance Company, Ltd. In an unprecedented settlement reached by the parties, the Defendants agreed to create a new Regulatory and Compliance Committee of the Pfizer Board of Directors (the "Regulatory Committee") to oversee and monitor Pfizer's compliance and drug marketing practices and to review the compensation policies for Pfizer's drug sales related employees.
- Case:** *Miller et al. v. IAC/InterActiveCorp et al.*
- Court:** Delaware Court of Chancery
- Highlights:** This litigation shut down efforts by controlling shareholders to obtain "dynastic control" of the company through improper stock class issuances, setting valuable precedent and sending a strong message to boards and management in all sectors that such moves will not go unchallenged.
- Summary:** BLB&G obtained this landmark victory for shareholder rights against IAC/InterActiveCorp and its controlling shareholder and chairman, Barry Diller. For decades, activist corporate founders and controllers sought ways to entrench their position atop the corporate hierarchy by granting themselves and other insiders "supervoting rights." Diller laid out a proposal to introduce a new class of non-voting stock to entrench "dynastic control" of IAC within the Diller family. BLB&G litigation on behalf of IAC shareholders ended in capitulation with the Defendants effectively conceding the case by abandoning the proposal. This became a critical corporate governance precedent, given the trend of public companies to introduce "low" and "no-vote" share classes, which diminish shareholder rights, insulate management from accountability, and can distort managerial incentives by providing controllers voting power out of line with their actual economic interests in public companies.
- Case:** *In re News Corp. Shareholder Derivative Litigation*
- Court:** Delaware Court of Chancery – Kent County
- Highlights:** An unprecedented settlement in which News Corp. recouped \$139 million and enacted significant corporate governance reforms that combat self-dealing in the boardroom.

Summary: Following News Corp.'s 2011 acquisition of a company owned by News Corp. Chairman and CEO Rupert Murdoch's daughter, and the phone-hacking scandal within its British newspaper division, we filed a derivative litigation on behalf of the company because of institutional shareholder concern with the conduct of News Corp.'s management. We ultimately obtained an unprecedented settlement in which News Corp. recouped \$139 million for the company coffers, and agreed to enact corporate governance enhancements to strengthen its compliance structure, the independence and functioning of its board, and the compensation and clawback policies for management.

Clients and Fees

We are firm believers in the contingency fee as a socially useful, productive and satisfying basis of compensation for legal services, particularly in litigation. Wherever appropriate, even with our corporate clients, we encourage retentions in which our fee is contingent on the outcome of the litigation. This way, it is not the number of hours worked that will determine our fee, but rather the result achieved for our client. The firm generally negotiates with our clients a contingent fee schedule specific to each litigation, and all fee proposals are approved by the client prior to commencing litigation, and ultimately by the Court.

Our clients include many large and well-known financial and lending institutions and pension funds, as well as privately held companies that are attracted to our firm because of our reputation, expertise, and fee structure. Most of the firm's clients are referred by other clients, law firms and lawyers, bankers, investors, and accountants. A considerable number of clients have been referred to the firm by former adversaries. We have always maintained a high level of independence and discretion in the cases we decide to prosecute. As a result, the level of personal satisfaction and commitment to our work is high.

In The Public Interest

Bernstein Litowitz Berger & Grossmann LLP is guided by two principles: excellence in legal work and a belief that the law should serve a socially useful and dynamic purpose. Attorneys at the firm are active in academic, community and *pro bono* activities, and regularly participate as speakers and contributors to professional organizations. In addition, the firm endows a public interest law fellowship and sponsors an academic scholarship at Columbia Law School. Highlights of our community contributions include the following:

Bernstein Litowitz Berger & Grossmann Public Interest Law Fellows

BLB&G is committed to fighting discrimination and effecting positive social change. In support of this commitment, the firm donates funds to Columbia Law School to create the Bernstein Litowitz Berger & Grossmann Public Interest Law Fellowship. This fund at Columbia Law School provides Fellows with 100% of the funding needed to make payments on their law school tuition loans so long as such graduates remain in the public interest law field. The BLB&G Fellows are able to begin their careers free of any school debt if they make a long-term commitment to public interest law.

Firm Sponsorship of Her Justice

BLB&G is a sponsor of Her Justice, a not-for-profit organization in New York City dedicated to providing *pro bono* legal representation to indigent women, principally vulnerable women, in connection with the myriad legal problems they face. The organization trains and supports the efforts of New York lawyers who provide *pro bono* counsel to these women. Several members and associates of the firm volunteer their time to help women who need divorces from abusive spouses, or representation on issues such as child support, custody, and visitation. To read more about Her Justice, visit the organization's website at <http://www.herjustice.org/>.

Firm Sponsorship of City Year New York

BLB&G is also an active supporter of City Year New York, a division of AmeriCorps. The program was founded in 1988 as a means of encouraging young people to devote time to public service and unites a diverse group of volunteers for a demanding year of full-time community service, leadership development and civic engagement. Through their service, corps members experience a rite of passage that can inspire a lifetime of citizenship and build a stronger democracy.

Max W. Berger Pre-Law Program

In order to encourage outstanding minority undergraduates to pursue a meaningful career in the legal profession, the Max W. Berger Pre-Law Program was established at Baruch College. Providing workshops, seminars, counseling and mentoring to Baruch students, the program facilitates and guides them through the law school research and application process, as well as placing them in appropriate internships and other pre-law working environments.

Our Attorneys

BLB&G employs a dedicated team of attorneys, including partners, counsel, associates, and senior staff attorneys. Biographies for each of our attorneys can be found on our website by clicking [here](#). On a case-by-case basis, we also make use of a pool of staff attorneys to supplement our litigation teams. The BLB&G team also includes investigators, financial analysts, paralegals, electronic-discovery specialists, information-technology professionals, and administrative staff. Biographies for our investigative team are available on our website by clicking [here](#), and biographies for the leaders of our administrative departments are viewable [here](#).

Exhibit 7

(Filed Under Seal in Part)

EXHIBIT 7: DETAIL OF LEAD COUNSEL'S HOURS AND LODESTAR BY PROJECT

Project #1: Initial Investigation. Lead Counsel, including both its attorneys and in-house investigators conducted an extensive investigation into the factual and legal underpinning of the potential claims in the Action. The work, the details of which are broken down chronologically below, included legal research and analysis of possible claims, an extensive review of publicly available documents such as analyst reports, SEC filings, new articles, and publicly available Symantec documents, and extensive efforts to identify, locate, contact, and interview potential witnesses, including interviews with numerous former employees of Symantec. The investigation also included analysis of Class-wide damages. In total, Lead Counsel's attorneys and professional staff spent a total of 583.25 hours, with a collective lodestar of \$259,990.00, on its efforts in investigating the claims from the outset, through the date the Consolidated Complaint was filed.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
07/17/2018	Jacob Foster	Investigator		01	1.25	\$300.00	\$375.00
07/18/2018	Jacob Foster	Investigator		01	1.00	\$300.00	\$300.00
07/18/2018	Jacob Foster	Investigator		01	1.00	\$300.00	\$300.00
07/18/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
07/18/2018	Lucas Gilmore	Senior Counsel		01	2.75	\$775.00	\$2,131.25
07/19/2018	Jacob Foster	Investigator		01	1.00	\$300.00	\$300.00
07/19/2018	Jacob Foster	Investigator		01	0.50	\$300.00	\$150.00
07/19/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
07/19/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
07/19/2018	Lucas Gilmore	Senior Counsel		01	2.50	\$775.00	\$1,937.50
07/20/2018	Amy Bitkower	Director of Investigations		01	3.00	\$575.00	\$1,725.00
07/20/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
07/20/2018	Jacob Foster	Investigator		01	3.00	\$300.00	\$900.00
07/20/2018	Lucas Gilmore	Senior Counsel		01	2.25	\$775.00	\$1,743.75
07/23/2018	Jacob Spaid	Associate		01	4.75	\$475.00	\$2,256.25
07/23/2018	Lucas Gilmore	Senior Counsel		01	4.25	\$775.00	\$3,293.75
07/24/2018	Lucas Gilmore	Senior Counsel		01	8.25	\$775.00	\$6,393.75
07/25/2018	Amy Bitkower	Director of Investigations		01	7.00	\$575.00	\$4,025.00
07/26/2018	Amy Bitkower	Director of Investigations		01	3.00	\$575.00	\$1,725.00
07/26/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
07/26/2018	Jacob Foster	Investigator		01	4.00	\$300.00	\$1,200.00
07/30/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
07/30/2018	Jacob Foster	Investigator		01	1.50	\$300.00	\$450.00
07/31/2018	Amy Bitkower	Director of Investigations		01	3.00	\$575.00	\$1,725.00
07/31/2018	Jacob Foster	Investigator		01	1.00	\$300.00	\$300.00
07/31/2018	Jacob Foster	Investigator		01	0.50	\$300.00	\$150.00

07/31/2018	Jacob Foster	Investigator		01	4.00	\$300.00	\$1,200.00
08/01/2018	Amy Bitkower	Director of Investigations		01	3.00	\$575.00	\$1,725.00
08/02/2018	Amy Bitkower	Director of Investigations		01	3.00	\$575.00	\$1,725.00
08/02/2018	Lucas Gilmore	Senior Counsel		01	2.50	\$775.00	\$1,937.50
08/03/2018	Amy Bitkower	Director of Investigations		01	4.00	\$575.00	\$2,300.00
08/03/2018	Jacob Foster	Investigator		01	0.50	\$300.00	\$150.00
08/03/2018	Jacob Foster	Investigator		01	1.00	\$300.00	\$300.00
08/03/2018	Jacob Foster	Investigator		01	1.00	\$300.00	\$300.00
08/06/2018	Amy Bitkower	Director of Investigations		01	5.00	\$575.00	\$2,875.00
08/06/2018	Jacob Foster	Investigator		01	1.00	\$300.00	\$300.00
08/07/2018	Jacob Foster	Investigator		01	1.00	\$300.00	\$300.00
08/07/2018	Jacob Foster	Investigator		01	3.00	\$300.00	\$900.00
08/08/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
08/09/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
08/15/2018	Amy Bitkower	Director of Investigations		01	0.25	\$575.00	\$143.75
08/15/2018	Jacob Spaid	Associate		01	1.00	\$475.00	\$475.00
08/16/2018	Jacob Spaid	Associate		01	0.50	\$475.00	\$237.50
08/21/2018	Lucas Gilmore	Senior Counsel		01	1.00	\$775.00	\$775.00
08/23/2018	David Stickney	Partner		01	1.25	\$975.00	\$1,218.75
08/27/2018	David Stickney	Partner		01	0.50	\$975.00	\$487.50
09/03/2018	Amy Bitkower	Director of Investigations		01	0.25	\$575.00	\$143.75
09/04/2018	Amy Bitkower	Director of Investigations		01	4.00	\$575.00	\$2,300.00
09/05/2018	Amy Bitkower	Director of Investigations		01	6.00	\$575.00	\$3,450.00
09/06/2018	Amy Bitkower	Director of Investigations		01	7.00	\$575.00	\$4,025.00
09/06/2018	Jacob Foster	Investigator		01	1.50	\$300.00	\$450.00
09/06/2018	Jacob Foster	Investigator		01	4.00	\$300.00	\$1,200.00

09/06/2018	Lucas Gilmore	Senior Counsel		01	1.75	\$775.00	\$1,356.25
09/07/2018	Amy Bitkower	Director of Investigations		01	3.00	\$575.00	\$1,725.00
09/07/2018	Jacob Foster	Investigator		01	3.00	\$300.00	\$900.00
09/07/2018	Jacob Foster	Investigator		01	4.00	\$300.00	\$1,200.00
09/07/2018	Lucas Gilmore	Senior Counsel		01	2.00	\$775.00	\$1,550.00
09/07/2018	David Stickney	Partner		01	0.50	\$975.00	\$487.50
09/08/2018	Amy Bitkower	Director of Investigations		01	3.00	\$575.00	\$1,725.00
09/08/2018	Andrew Thompson	Investigator		01	3.50	\$400.00	\$1,400.00
09/09/2018	Andrew Thompson	Investigator		01	5.00	\$400.00	\$2,000.00
09/10/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
09/10/2018	Amy Bitkower	Director of Investigations		01	0.50	\$575.00	\$287.50
09/10/2018	Andrew Thompson	Investigator		01	8.00	\$400.00	\$3,200.00
09/10/2018	Jacob Foster	Investigator		01	3.00	\$300.00	\$900.00
09/10/2018	Jacob Foster	Investigator		01	4.00	\$300.00	\$1,200.00
09/10/2018	Lucas Gilmore	Senior Counsel		01	2.50	\$775.00	\$1,937.50
09/11/2018	Amy Bitkower	Director of Investigations		01	4.50	\$575.00	\$2,587.50
09/11/2018	Jacob Foster	Investigator		01	1.50	\$300.00	\$450.00
09/11/2018	Joelle Landino	Investigator		01	0.25	\$425.00	\$106.25
09/12/2018	Jacob Foster	Investigator		01	2.50	\$300.00	\$750.00
09/13/2018	Amy Bitkower	Director of Investigations		01	3.00	\$575.00	\$1,725.00
09/13/2018	Jacob Foster	Investigator		01	1.50	\$300.00	\$450.00
09/13/2018	Jacob Foster	Investigator		01	0.50	\$300.00	\$150.00
09/13/2018	Jacob Foster	Investigator		01	2.50	\$300.00	\$750.00

09/13/2018	Joelle Landino	Investigator		01	5.25	\$425.00	\$2,231.25
09/14/2018	Joelle Landino	Investigator		01	6.50	\$425.00	\$2,762.50
09/17/2018	Jacob Foster	Investigator		01	1.00	\$300.00	\$300.00
09/17/2018	Joelle Landino	Investigator		01	6.50	\$425.00	\$2,762.50
09/18/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
09/18/2018	Joelle Landino	Investigator		01	6.00	\$425.00	\$2,550.00
09/19/2018	Joelle Landino	Investigator		01	3.25	\$425.00	\$1,381.25
09/20/2018	Jacob Foster	Investigator		01	1.00	\$300.00	\$300.00
09/20/2018	Joelle Landino	Investigator		01	6.50	\$425.00	\$2,762.50
09/21/2018	Amy Bitkower	Director of Investigations		01	2.00	\$575.00	\$1,150.00
09/21/2018	Joelle Landino	Investigator		01	6.25	\$425.00	\$2,656.25
09/24/2018	Amy Bitkower	Director of Investigations		01	5.00	\$575.00	\$2,875.00
09/24/2018	Jacob Foster	Investigator		01	2.50	\$300.00	\$750.00
09/24/2018	Joelle Landino	Investigator		01	6.75	\$425.00	\$2,868.75
09/24/2018	David Stickney	Partner		01	0.75	\$975.00	\$731.25
09/25/2018	Amy Bitkower	Director of Investigations		01	5.00	\$575.00	\$2,875.00
09/25/2018	Jacob Foster	Investigator		01	3.50	\$300.00	\$1,050.00

09/25/2018	Joelle Landino	Investigator		01	2.75	\$425.00	\$1,168.75
09/25/2018	David Stickney	Partner		01	0.75	\$975.00	\$731.25
09/26/2018	Joelle Landino	Investigator		01	2.50	\$425.00	\$1,062.50
09/27/2018	Amy Bitkower	Director of Investigations		01	7.00	\$575.00	\$4,025.00
09/27/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
09/27/2018	Joelle Landino	Investigator		01	3.50	\$425.00	\$1,487.50
09/28/2018	Joelle Landino	Investigator		01	5.25	\$425.00	\$2,231.25
09/28/2018	David Stickney	Partner		01	0.50	\$975.00	\$487.50
10/01/2018	Joelle Landino	Investigator		01	6.25	\$425.00	\$2,656.25
10/02/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
10/02/2018	Joelle Landino	Investigator		01	6.50	\$425.00	\$2,762.50
10/03/2018	Amy Bitkower	Director of Investigations		01	3.00	\$575.00	\$1,725.00
10/03/2018	Joelle Landino	Investigator		01	1.25	\$425.00	\$531.25
10/04/2018	Amy Bitkower	Director of Investigations		01	5.00	\$575.00	\$2,875.00
10/04/2018	Jacob Foster	Investigator		01	1.50	\$300.00	\$450.00
10/04/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00

10/04/2018	Joelle Landino	Investigator		01	3.75	\$425.00	\$1,593.75
10/05/2018	Amy Bitkower	Director of Investigations		01	5.00	\$575.00	\$2,875.00
10/05/2018	Jacob Foster	Investigator		01	3.50	\$300.00	\$1,050.00
10/05/2018	Joelle Landino	Investigator		01	6.75	\$425.00	\$2,868.75
10/08/2018	Amy Bitkower	Director of Investigations		01	2.00	\$575.00	\$1,150.00
10/08/2018	Jacob Foster	Investigator		01	1.25	\$300.00	\$375.00
10/08/2018	Joelle Landino	Investigator		01	6.25	\$425.00	\$2,656.25
10/09/2018	Joelle Landino	Investigator		01	7.75	\$425.00	\$3,293.75
10/10/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
10/10/2018	Joelle Landino	Investigator		01	7.25	\$425.00	\$3,081.25
10/11/2018	Amy Bitkower	Director of Investigations		01	2.00	\$575.00	\$1,150.00
10/11/2018	Jacob Foster	Investigator		01	3.00	\$300.00	\$900.00
10/11/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
10/11/2018	Joelle Landino	Investigator		01	3.50	\$425.00	\$1,487.50
10/12/2018	Amy Bitkower	Director of Investigations		01	0.50	\$575.00	\$287.50
10/12/2018	Jacob Foster	Investigator		01	3.50	\$300.00	\$1,050.00
10/12/2018	Jacob Foster	Investigator		01	2.50	\$300.00	\$750.00
10/12/2018	Jacob Foster	Investigator		01	1.00	\$300.00	\$300.00
10/12/2018	Joelle Landino	Investigator		01	5.75	\$425.00	\$2,443.75
10/15/2018	Amy Bitkower	Director of Investigations		01	2.00	\$575.00	\$1,150.00
10/15/2018	Jacob Foster	Investigator		01	3.00	\$300.00	\$900.00
10/15/2018	Jacob Foster	Investigator		01	4.00	\$300.00	\$1,200.00

10/15/2018	Joelle Landino	Investigator		01	3.50	\$425.00	\$1,487.50
10/16/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
10/16/2018	Jacob Foster	Investigator		01	4.00	\$300.00	\$1,200.00
10/16/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
10/16/2018	Joelle Landino	Investigator		01	4.00	\$425.00	\$1,700.00
10/17/2018	Amy Bitkower	Director of Investigations		01	0.25	\$575.00	\$143.75
10/17/2018	Jacob Spaid	Associate		01	2.75	\$475.00	\$1,306.25
10/17/2018	Joelle Landino	Investigator		01	7.00	\$425.00	\$2,975.00
10/17/2018	Jose Echegaray	Case Managers		01	2.75	\$350.00	\$962.50
10/17/2018	Lucas Gilmore	Senior Counsel		01	0.75	\$775.00	\$581.25
10/18/2018	Amy Bitkower	Director of Investigations		01	7.00	\$575.00	\$4,025.00
10/18/2018	Joelle Landino	Investigator		01	6.50	\$425.00	\$2,762.50
10/19/2018	Jacob Foster	Investigator		01	3.50	\$300.00	\$1,050.00
10/19/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
10/19/2018	Joelle Landino	Investigator		01	5.25	\$425.00	\$2,231.25
10/22/2018	Dena Bielasz	Case Managers		01	1.50	\$335.00	\$502.50
10/22/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
10/22/2018	Joelle Landino	Investigator		01	7.75	\$425.00	\$3,293.75
10/23/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
10/23/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00

10/23/2018	Joelle Landino	Investigator		01	6.75	\$425.00	\$2,868.75
10/23/2018	Jose Echegaray	Case Managers		01	2.75	\$350.00	\$962.50
10/24/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
10/24/2018	Jacob Foster	Investigator		01	1.75	\$300.00	\$525.00
10/25/2018	Amy Bitkower	Director of Investigations		01	0.25	\$575.00	\$143.75
10/25/2018	Jacob Foster	Investigator		01	3.00	\$300.00	\$900.00
10/25/2018	Joelle Landino	Investigator		01	8.25	\$425.00	\$3,506.25
10/26/2018	Amy Bitkower	Director of Investigations		01	2.00	\$575.00	\$1,150.00
10/26/2018	Joelle Landino	Investigator		01	7.75	\$425.00	\$3,293.75
10/29/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
10/29/2018	Jacob Foster	Investigator		01	2.25	\$300.00	\$675.00
10/29/2018	Joelle Landino	Investigator		01	6.00	\$425.00	\$2,550.00
10/29/2018	Julia Tebor	Associate		01	1.50	\$575.00	\$862.50
10/30/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
10/30/2018	Jacob Foster	Investigator		01	2.50	\$300.00	\$750.00
10/30/2018	Joelle Landino	Investigator		01	4.00	\$425.00	\$1,700.00
10/31/2018	Jacob Foster	Investigator		01	3.00	\$300.00	\$900.00
10/31/2018	Jacob Foster	Investigator		01	4.00	\$300.00	\$1,200.00
10/31/2018	Joelle Landino	Investigator		01	3.50	\$425.00	\$1,487.50
11/01/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00

11/01/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
11/01/2018	Joelle Landino	Investigator		01	2.50	\$425.00	\$1,062.50
11/02/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
11/02/2018	Jacob Foster	Investigator		01	2.00	\$300.00	\$600.00
11/02/2018	Joelle Landino	Investigator		01	6.25	\$425.00	\$2,656.25
11/05/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
11/05/2018	Joelle Landino	Investigator		01	6.75	\$425.00	\$2,868.75
11/06/2018	Amy Bitkower	Director of Investigations		01	1.00	\$575.00	\$575.00
11/06/2018	Jacob Foster	Investigator		01	2.50	\$300.00	\$750.00
11/06/2018	Joelle Landino	Investigator		01	7.25	\$425.00	\$3,081.25
11/07/2018	Jacob Foster	Investigator		01	1.50	\$300.00	\$450.00
11/07/2018	Jacob Foster	Investigator		01	4.00	\$300.00	\$1,200.00
11/07/2018	Joelle Landino	Investigator		01	1.75	\$425.00	\$743.75
11/08/2018	Amy Bitkower	Director of Investigations		01	0.25	\$575.00	\$143.75
11/08/2018	Jacob Foster	Investigator		01	0.50	\$300.00	\$150.00
11/08/2018	Joelle Landino	Investigator		01	2.50	\$425.00	\$1,062.50
11/09/2018	Amy Bitkower	Director of Investigations		01	0.25	\$575.00	\$143.75
11/09/2018	Jacob Foster	Investigator		01	3.00	\$300.00	\$900.00
11/10/2018	Joelle Landino	Investigator		01	1.75	\$425.00	\$743.75
11/12/2018	Amy Bitkower	Director of Investigations		01	2.00	\$575.00	\$1,150.00

11/12/2018	Joelle Landino	Investigator		01	6.00	\$425.00	\$2,550.00
11/13/2018	Amy Bitkower	Director of Investigations		01	0.50	\$575.00	\$287.50
11/13/2018	Jacob Foster	Investigator		01	3.75	\$300.00	\$1,125.00
11/14/2018	Amy Bitkower	Director of Investigations		01	0.50	\$575.00	\$287.50
11/14/2018	Jacob Foster	Investigator		01	4.00	\$300.00	\$1,200.00
11/14/2018	Jacob Foster	Investigator		01	1.00	\$300.00	\$300.00
11/14/2018	Joelle Landino	Investigator		01	4.50	\$425.00	\$1,912.50
			TOTALS FOR PROJECT #1:		583.25		\$259,990.00
Project #2: Freedom of Information Act Request to the SEC. In conjunction with the investigation, Lead Counsel filed a Freedom of Information Act (“FOIA”) request with the SEC to obtain certain materials related to its investigation of Symantec. Lead Counsel devoted 30.50 hours with a lodestar of \$16,242.50 to this project. The work, the details of which are broken down chronologically below, included preparing the FOIA requests to the SEC, following up with the SEC regarding their response, and preparing an appeal from the SEC’s denial of the request.							
Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
8/15/2018	Jacob Spaid	Associate		02	4.25	\$475.00	\$2,018.75
08/16/2018	David Stickney	Partner		02	0.50	\$975.00	\$487.50
08/16/2018	Jacob Spaid	Associate		02	2.25	\$475.00	\$1,068.75
08/16/2018	Lucas Gilmore	Senior Counsel		02	1.00	\$775.00	\$775.00
08/17/2018	Jacob Spaid	Associate		02	0.75	\$475.00	\$356.25
08/17/2018	Lucas Gilmore	Senior Counsel		02	0.50	\$775.00	\$387.50
10/23/2018	Dena Bielasz	Case Managers		02	0.50	\$335.00	\$167.50
10/23/2018	Jacob Spaid	Associate		02	2.00	\$475.00	\$950.00

10/23/2018	Lucas Gilmore	Senior Counsel		02	2.50	\$775.00	\$1,937.50
10/24/2018	Dena Bielasz	Case Managers		02	1.25	\$335.00	\$418.75
10/24/2018	Jacob Spaid	Associate		02	4.50	\$475.00	\$2,137.50
10/24/2018	Lucas Gilmore	Senior Counsel		02	2.50	\$775.00	\$1,937.50
10/26/2018	Jacob Spaid	Associate		02	0.25	\$475.00	\$118.75
12/04/2018	Jacob Spaid	Associate		02	4.50	\$475.00	\$2,137.50
06/15/2020	Ryan Dykhous	Associate		02	0.50	\$425.00	\$212.50
07/06/2020	Ryan Dykhous	Associate		02	1.00	\$425.00	\$425.00
07/07/2020	Jose Echegaray	Case Managers		02	0.50	\$350.00	\$175.00
07/07/2020	Ryan Dykhous	Associate		02	1.25	\$425.00	\$531.25
			TOTALS FOR PROJECT #2:		30.50		\$16,242.50

Project #3: Consolidated Complaint. Lead Counsel spent a total of 890.25 hours, with a total lodestar of \$622,882.50 in preparing for and drafting the Consolidated Complaint and conducting related legal and factual research. The work, the details of which are broken down chronologically below, included factual legal research and analysis of the claims asserted, including securities fraud claims and insider trading claims, drafting, revising and filing the Complaint, and service of the Complaint on Defendants.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
07/20/2018	Jacob Spaid	Associate		03	1.75	\$475.00	\$831.25
07/24/2018	Jacob Spaid	Associate		03	2.50	\$475.00	\$1,187.50
08/15/2018	Lucas Gilmore	Senior Counsel		03	1.50	\$775.00	\$1,162.50
08/21/2018	Lucas Gilmore	Senior Counsel		03	2.50	\$775.00	\$1,937.50
09/12/2018	Lucas Gilmore	Senior Counsel		03	1.50	\$775.00	\$1,162.50
09/13/2018	Lucas Gilmore	Senior Counsel		03	2.00	\$775.00	\$1,550.00
09/21/2018	Rebecca Boon	Partner		03	4.00	\$875.00	\$3,500.00

09/24/2018	Lucas Gilmore	Senior Counsel		03	3.75	\$775.00	\$2,906.25
09/25/2018	Rebecca Boon	Partner		03	4.00	\$875.00	\$3,500.00
09/26/2018	Lucas Gilmore	Senior Counsel		03	0.75	\$775.00	\$581.25
09/26/2018	Rebecca Boon	Partner		03	6.00	\$875.00	\$5,250.00
09/27/2018	Lucas Gilmore	Senior Counsel		03	1.50	\$775.00	\$1,162.50
09/27/2018	Rebecca Boon	Partner		03	3.50	\$875.00	\$3,062.50
09/27/2018	David Stickney	Partner		03	1.00	\$975.00	\$975.00
09/28/2018	Rebecca Boon	Partner		03	2.50	\$875.00	\$2,187.50
10/01/2018	Rebecca Boon	Partner		03	3.50	\$875.00	\$3,062.50
10/02/2018	Lucas Gilmore	Senior Counsel		03	0.75	\$775.00	\$581.25
10/02/2018	Rebecca Boon	Partner		03	5.50	\$875.00	\$4,812.50
10/02/2018	David Stickney	Partner		03	1.00	\$975.00	\$975.00
10/03/2018	Lucas Gilmore	Senior Counsel		03	1.00	\$775.00	\$775.00
10/03/2018	Rebecca Boon	Partner		03	8.00	\$875.00	\$7,000.00
10/03/2018	David Stickney	Partner		03	1.25	\$975.00	\$1,218.75
10/04/2018	Lucas Gilmore	Senior Counsel		03	5.25	\$775.00	\$4,068.75

10/04/2018	Rebecca Boon	Partner		03	9.00	\$875.00	\$7,875.00
10/05/2018	Lucas Gilmore	Senior Counsel		03	7.50	\$775.00	\$5,812.50
10/05/2018	Rebecca Boon	Partner		03	4.50	\$875.00	\$3,937.50
10/05/2018	David Stickney	Partner		03	1.25	\$975.00	\$1,218.75
10/08/2018	Lucas Gilmore	Senior Counsel		03	2.25	\$775.00	\$1,743.75
10/08/2018	David Stickney	Partner		03	0.50	\$975.00	\$487.50
10/09/2018	Jacob Spaid	Associate		03	3.25	\$475.00	\$1,543.75
10/09/2018	Jose Echegaray	Case Managers		03	1.25	\$350.00	\$437.50
10/09/2018	Lucas Gilmore	Senior Counsel		03	7.25	\$775.00	\$5,618.75
10/09/2018	Rebecca Boon	Partner		03	8.50	\$875.00	\$7,437.50
10/09/2018	David Stickney	Partner		03	1.00	\$975.00	\$975.00
10/10/2018	Jacob Spaid	Associate		03	7.25	\$475.00	\$3,443.75
10/10/2018	Jose Echegaray	Case Managers		03	0.25	\$350.00	\$87.50
10/10/2018	Jose Echegaray	Case Managers		03	0.25	\$350.00	\$87.50
10/10/2018	Lucas Gilmore	Senior Counsel		03	9.75	\$775.00	\$7,556.25
10/10/2018	Rebecca Boon	Partner		03	7.00	\$875.00	\$6,125.00

10/10/2018	David Stickney	Partner		03	1.25	\$975.00	\$1,218.75
10/11/2018	Jacob Spaid	Associate		03	9.75	\$475.00	\$4,631.25
10/11/2018	Jose Echegaray	Case Managers		03	0.50	\$350.00	\$175.00
10/11/2018	Jose Echegaray	Case Managers		03	0.50	\$350.00	\$175.00
10/11/2018	Julia Tebor	Associate		03	4.00	\$575.00	\$2,300.00
10/11/2018	Lucas Gilmore	Senior Counsel		03	5.75	\$775.00	\$4,456.25
10/11/2018	Lucas Gilmore	Senior Counsel		03	2.50	\$775.00	\$1,937.50
10/11/2018	Rebecca Boon	Partner		03	7.50	\$875.00	\$6,562.50
10/11/2018	David Stickney	Partner		03	0.75	\$975.00	\$731.25
10/12/2018	Jacob Spaid	Associate		03	4.75	\$475.00	\$2,256.25
10/12/2018	Julia Tebor	Associate		03	3.00	\$575.00	\$1,725.00
10/12/2018	Lucas Gilmore	Senior Counsel		03	3.50	\$775.00	\$2,712.50
10/12/2018	Rebecca Boon	Partner		03	6.50	\$875.00	\$5,687.50
10/12/2018	David Stickney	Partner		03	0.25	\$975.00	\$243.75
10/15/2018	Jacob Spaid	Associate		03	0.25	\$475.00	\$118.75
10/15/2018	Jose Echegaray	Case Managers		03	3.50	\$350.00	\$1,225.00
10/15/2018	Lucas Gilmore	Senior Counsel		03	2.25	\$775.00	\$1,743.75
10/15/2018	Lucas Gilmore	Senior Counsel		03	3.50	\$775.00	\$2,712.50
10/15/2018	Rebecca Boon	Partner		03	6.00	\$875.00	\$5,250.00
10/15/2018	David Stickney	Partner		03	1.25	\$975.00	\$1,218.75
10/16/2018	Jacob Spaid	Associate		03	2.25	\$475.00	\$1,068.75
10/16/2018	Julia Tebor	Associate		03	2.50	\$575.00	\$1,437.50
10/16/2018	Lucas Gilmore	Senior Counsel		03	4.75	\$775.00	\$3,681.25

10/16/2018	Lucas Gilmore	Senior Counsel		03	0.75	\$775.00	\$581.25
10/16/2018	Rebecca Boon	Partner		03	5.50	\$875.00	\$4,812.50
10/16/2018	David Stickney	Partner		03	1.25	\$975.00	\$1,218.75
10/17/2018	Jose Echegaray	Case Managers		03	0.25	\$350.00	\$87.50
10/17/2018	Julia Tebor	Associate		03	4.00	\$575.00	\$2,300.00
10/17/2018	Lucas Gilmore	Senior Counsel		03	5.75	\$775.00	\$4,456.25
10/17/2018	Lucas Gilmore	Senior Counsel		03	3.75	\$775.00	\$2,906.25
10/17/2018	Lucas Gilmore	Senior Counsel		03	2.25	\$775.00	\$1,743.75
10/17/2018	Rebecca Boon	Partner		03	1.00	\$875.00	\$875.00
10/17/2018	David Stickney	Partner		03	1.75	\$975.00	\$1,706.25
10/18/2018	Jacob Spaid	Associate		03	6.50	\$475.00	\$3,087.50
10/18/2018	Jose Echegaray	Case Managers		03	2.00	\$350.00	\$700.00
10/18/2018	Julia Tebor	Associate		03	1.75	\$575.00	\$1,006.25
10/18/2018	Lucas Gilmore	Senior Counsel		03	5.25	\$775.00	\$4,068.75
10/18/2018	Lucas Gilmore	Senior Counsel		03	1.25	\$775.00	\$968.75
10/18/2018	Lucas Gilmore	Senior Counsel		03	3.25	\$775.00	\$2,518.75
10/18/2018	Rebecca Boon	Partner		03	2.50	\$875.00	\$2,187.50
10/19/2018	Jacob Spaid	Associate		03	8.75	\$475.00	\$4,156.25
10/19/2018	Jose Echegaray	Case Managers		03	3.25	\$350.00	\$1,137.50
10/19/2018	Jose Echegaray	Case Managers		03	0.25	\$350.00	\$87.50
10/19/2018	Julia Tebor	Associate		03	2.00	\$575.00	\$1,150.00
10/19/2018	Lucas Gilmore	Senior Counsel		03	4.25	\$775.00	\$3,293.75
10/19/2018	Lucas Gilmore	Senior Counsel		03	3.25	\$775.00	\$2,518.75

10/19/2018	Lucas Gilmore	Senior Counsel		03	2.25	\$775.00	\$1,743.75
10/19/2018	Rebecca Boon	Partner		03	3.00	\$875.00	\$2,625.00
10/19/2018	David Stickney	Partner		03	1.25	\$975.00	\$1,218.75
10/21/2018	Lucas Gilmore	Senior Counsel		03	4.25	\$775.00	\$3,293.75
10/22/2018	Jacob Spaid	Associate		03	7.75	\$475.00	\$3,681.25
10/22/2018	Julia Tebor	Associate		03	3.25	\$575.00	\$1,868.75
10/22/2018	Lucas Gilmore	Senior Counsel		03	8.25	\$775.00	\$6,393.75
10/22/2018	Rebecca Boon	Partner		03	4.00	\$875.00	\$3,500.00
10/22/2018	David Stickney	Partner		03	0.75	\$975.00	\$731.25
10/23/2018	Dena Bielasz	Case Managers		03	2.50	\$335.00	\$837.50
10/23/2018	Jacob Spaid	Associate		03	2.50	\$475.00	\$1,187.50
10/23/2018	Jose Echegaray	Case Managers		03	2.00	\$350.00	\$700.00
10/23/2018	Julia Tebor	Associate		03	6.50	\$575.00	\$3,737.50
10/23/2018	Lucas Gilmore	Senior Counsel		03	5.00	\$775.00	\$3,875.00
10/23/2018	Rebecca Boon	Partner		03	8.50	\$875.00	\$7,437.50
10/23/2018	David Stickney	Partner		03	0.50	\$975.00	\$487.50
10/24/2018	Jacob Spaid	Associate		03	4.75	\$475.00	\$2,256.25
10/24/2018	Julia Tebor	Associate		03	1.50	\$575.00	\$862.50
10/24/2018	Lucas Gilmore	Senior Counsel		03	6.00	\$775.00	\$4,650.00
10/24/2018	Rebecca Boon	Partner		03	8.50	\$875.00	\$7,437.50
10/24/2018	David Stickney	Partner		03	0.25	\$975.00	\$243.75

10/25/2018	Jacob Spaid	Associate		03	8.75	\$475.00	\$4,156.25
10/25/2018	Julia Tebor	Associate		03	5.75	\$575.00	\$3,306.25
10/25/2018	Lucas Gilmore	Senior Counsel		03	7.75	\$775.00	\$6,006.25
10/25/2018	Rebecca Boon	Partner		03	8.50	\$875.00	\$7,437.50
10/25/2018	David Stickney	Partner		03	0.25	\$975.00	\$243.75
10/26/2018	Dena Bielasz	Case Managers		03	2.25	\$335.00	\$753.75
10/26/2018	Jacob Spaid	Associate		03	6.50	\$475.00	\$3,087.50
10/26/2018	Jose Echegaray	Case Managers		03	0.50	\$350.00	\$175.00
10/26/2018	Julia Tebor	Associate		03	2.00	\$575.00	\$1,150.00
10/26/2018	Lucas Gilmore	Senior Counsel		03	6.50	\$775.00	\$5,037.50
10/26/2018	Rebecca Boon	Partner		03	9.50	\$875.00	\$8,312.50
10/26/2018	David Stickney	Partner		03	0.50	\$975.00	\$487.50
10/27/2018	Rebecca Boon	Partner		03	7.50	\$875.00	\$6,562.50
10/28/2018	Lucas Gilmore	Senior Counsel		03	2.50	\$775.00	\$1,937.50
10/28/2018	Rebecca Boon	Partner		03	2.50	\$875.00	\$2,187.50
10/28/2018	David Stickney	Partner		03	1.00	\$975.00	\$975.00

10/29/2018	Jacob Spaid	Associate		03	8.00	\$475.00	\$3,800.00
10/29/2018	Jose Echegaray	Case Managers		03	1.50	\$350.00	\$525.00
10/29/2018	Jose Echegaray	Case Managers		03	0.25	\$350.00	\$87.50
10/29/2018	Jose Echegaray	Case Managers		03	0.50	\$350.00	\$175.00
10/29/2018	Jose Echegaray	Case Managers		03	0.50	\$350.00	\$175.00
10/29/2018	Lucas Gilmore	Senior Counsel		03	6.50	\$775.00	\$5,037.50
10/29/2018	Rebecca Boon	Partner		03	6.50	\$875.00	\$5,687.50
10/29/2018	David Stickney	Partner		03	1.50	\$975.00	\$1,462.50
10/30/2018	Jacob Spaid	Associate		03	8.25	\$475.00	\$3,918.75
10/30/2018	Joelle Landino	Investigator		03	4.25	\$425.00	\$1,806.25
10/30/2018	Jose Echegaray	Case Managers		03	1.50	\$350.00	\$525.00
10/30/2018	Julia Tebor	Associate		03	4.25	\$575.00	\$2,443.75
10/30/2018	Lucas Gilmore	Senior Counsel		03	7.50	\$775.00	\$5,812.50
10/30/2018	Rebecca Boon	Partner		03	8.50	\$875.00	\$7,437.50
10/30/2018	David Stickney	Partner		03	2.00	\$975.00	\$1,950.00
10/31/2018	Jacob Spaid	Associate		03	8.75	\$475.00	\$4,156.25
10/31/2018	Joelle Landino	Investigator		03	3.50	\$425.00	\$1,487.50
10/31/2018	Jose Echegaray	Case Managers		03	2.75	\$350.00	\$962.50
10/31/2018	Julia Tebor	Associate		03	7.75	\$575.00	\$4,456.25
10/31/2018	Lucas Gilmore	Senior Counsel		03	6.75	\$775.00	\$5,231.25

10/31/2018	Rebecca Boon	Partner		03	6.50	\$875.00	\$5,687.50
10/31/2018	David Stickney	Partner		03	2.00	\$975.00	\$1,950.00
11/01/2018	Jacob Spaid	Associate		03	7.50	\$475.00	\$3,562.50
11/01/2018	Joelle Landino	Investigator		03	4.00	\$425.00	\$1,700.00
11/01/2018	Jose Echegaray	Case Managers		03	0.50	\$350.00	\$175.00
11/01/2018	Jose Echegaray	Case Managers		03	0.75	\$350.00	\$262.50
11/01/2018	Julia Tebor	Associate		03	1.00	\$575.00	\$575.00
11/01/2018	Lucas Gilmore	Senior Counsel		03	4.25	\$775.00	\$3,293.75
11/01/2018	Rebecca Boon	Partner		03	7.50	\$875.00	\$6,562.50
11/01/2018	David Stickney	Partner		03	1.00	\$975.00	\$975.00
11/02/2018	Jacob Spaid	Associate		03	7.25	\$475.00	\$3,443.75
11/02/2018	Joelle Landino	Investigator		03	2.50	\$425.00	\$1,062.50
11/02/2018	Jose Echegaray	Case Managers		03	0.25	\$350.00	\$87.50
11/02/2018	Lucas Gilmore	Senior Counsel		03	7.50	\$775.00	\$5,812.50
11/02/2018	Rebecca Boon	Partner		03	8.00	\$875.00	\$7,000.00
11/02/2018	David Stickney	Partner		03	2.00	\$975.00	\$1,950.00
11/04/2018	Lucas Gilmore	Senior Counsel		03	1.25	\$775.00	\$968.75
11/04/2018	Rebecca Boon	Partner		03	2.00	\$875.00	\$1,750.00
11/04/2018	David Stickney	Partner		03	4.00	\$975.00	\$3,900.00

11/05/2018	Jacob Spaid	Associate		03	8.50	\$475.00	\$4,037.50
11/05/2018	Jose Echegaray	Case Managers		03	0.25	\$350.00	\$87.50
11/05/2018	Lucas Gilmore	Senior Counsel		03	9.50	\$775.00	\$7,362.50
11/05/2018	Rebecca Boon	Partner		03	8.50	\$875.00	\$7,437.50
11/05/2018	David Stickney	Partner		03	2.00	\$975.00	\$1,950.00
11/06/2018	Jacob Spaid	Associate		03	3.75	\$475.00	\$1,781.25
11/06/2018	Jose Echegaray	Case Managers		03	0.50	\$350.00	\$175.00
11/06/2018	Jose Echegaray	Case Managers		03	0.75	\$350.00	\$262.50
11/06/2018	Julia Tebor	Associate		03	0.50	\$575.00	\$287.50
11/06/2018	Lucas Gilmore	Senior Counsel		03	10.50	\$775.00	\$8,137.50
11/06/2018	Rebecca Boon	Partner		03	8.00	\$875.00	\$7,000.00
11/06/2018	David Stickney	Partner		03	2.75	\$975.00	\$2,681.25
11/07/2018	Dena Bielasz	Case Managers		03	1.25	\$335.00	\$418.75

11/07/2018	Jacob Spaid	Associate		03	5.75	\$475.00	\$2,731.25
11/07/2018	Jose Echegaray	Case Managers		03	0.50	\$350.00	\$175.00
11/07/2018	Jose Echegaray	Case Managers		03	0.25	\$350.00	\$87.50
11/07/2018	Julia Tebor	Associate		03	10.75	\$575.00	\$6,181.25
11/07/2018	Rebecca Boon	Partner		03	7.50	\$875.00	\$6,562.50
11/07/2018	David Stickney	Partner		03	2.25	\$975.00	\$2,193.75
11/08/2018	Dena Bielasz	Case Managers		03	5.00	\$335.00	\$1,675.00
11/08/2018	Jacob Spaid	Associate		03	9.50	\$475.00	\$4,512.50
11/08/2018	Jose Echegaray	Case Managers		03	0.50	\$350.00	\$175.00
11/08/2018	Jose Echegaray	Case Managers		03	2.50	\$350.00	\$875.00
11/08/2018	Jose Echegaray	Case Managers		03	0.50	\$350.00	\$175.00
11/08/2018	Jose Echegaray	Case Managers		03	0.50	\$350.00	\$175.00
11/08/2018	Lucas Gilmore	Senior Counsel		03	11.00	\$775.00	\$8,525.00
11/08/2018	Rebecca Boon	Partner		03	9.00	\$875.00	\$7,875.00
11/08/2018	David Stickney	Partner		03	3.00	\$975.00	\$2,925.00
11/09/2018	Dena Bielasz	Case Managers		03	1.00	\$335.00	\$335.00
11/09/2018	Jacob Spaid	Associate		03	9.25	\$475.00	\$4,393.75

11/09/2018	Lucas Gilmore	Senior Counsel		03	10.00	\$775.00	\$7,750.00
11/09/2018	Rebecca Boon	Partner		03	7.50	\$875.00	\$6,562.50
11/09/2018	David Stickney	Partner		03	2.00	\$975.00	\$1,950.00
11/10/2018	Rebecca Boon	Partner		03	2.50	\$875.00	\$2,187.50
11/10/2018	David Stickney	Partner		03	4.50	\$975.00	\$4,387.50
11/11/2018	Jacob Spaid	Associate		03	6.75	\$475.00	\$3,206.25
11/11/2018	Rebecca Boon	Partner		03	2.50	\$875.00	\$2,187.50
11/11/2018	David Stickney	Partner		03	3.25	\$975.00	\$3,168.75
11/12/2018	Jacob Spaid	Associate		03	4.50	\$475.00	\$2,137.50
11/12/2018	Julia Tebor	Associate		03	1.25	\$575.00	\$718.75
11/12/2018	Rebecca Boon	Partner		03	3.50	\$875.00	\$3,062.50
11/12/2018	David Stickney	Partner		03	3.00	\$975.00	\$2,925.00
11/13/2018	Dena Bielasz	Case Managers		03	8.25	\$335.00	\$2,763.75
11/13/2018	Jacob Spaid	Associate		03	8.75	\$475.00	\$4,156.25
11/13/2018	Joelle Landino	Investigator		03	5.75	\$425.00	\$2,443.75
11/13/2018	Jose Echegaray	Case Managers		03	0.25	\$350.00	\$87.50
11/13/2018	Julia Tebor	Associate		03	4.00	\$575.00	\$2,300.00
11/13/2018	Rebecca Boon	Partner		03	5.00	\$875.00	\$4,375.00
11/13/2018	David Stickney	Partner		03	2.25	\$975.00	\$2,193.75

11/14/2018	Dena Bielasz	Case Managers		03	7.00	\$335.00	\$2,345.00	
11/14/2018	Jacob Spaid	Associate		03	11.25	\$475.00	\$5,343.75	
11/14/2018	Jose Echegaray	Case Managers		03	0.75	\$350.00	\$262.50	
11/14/2018	Julia Tebor	Associate		03	12.00	\$575.00	\$6,900.00	
11/14/2018	Rebecca Boon	Partner		03	11.50	\$875.00	\$10,062.50	
11/14/2018	David Stickney	Partner		03	5.00	\$975.00	\$4,875.00	
11/15/2018	Dena Bielasz	Case Managers		03	1.00	\$335.00	\$335.00	
11/15/2018	Jacob Spaid	Associate		03	0.75	\$475.00	\$356.25	
11/15/2018	Julia Tebor	Associate		03	3.00	\$575.00	\$1,725.00	
11/15/2018	Rebecca Boon	Partner		03	6.50	\$875.00	\$5,687.50	
11/15/2018	David Stickney	Partner		03	3.00	\$975.00	\$2,925.00	
11/16/2018	Rebecca Boon	Partner		03	1.00	\$875.00	\$875.00	
11/19/2018	Rebecca Boon	Partner		03	2.00	\$875.00	\$1,750.00	
11/26/2018	Dena Bielasz	Case Managers		03	0.50	\$335.00	\$167.50	
11/27/2018	Rebecca Boon	Partner		03	0.50	\$875.00	\$437.50	
11/28/2018	Dena Bielasz	Case Managers		03	3.25	\$335.00	\$1,088.75	
11/28/2018	Rebecca Boon	Partner		03	1.00	\$875.00	\$875.00	
				TOTALS FOR PROJECT #3:		890.25		\$622,882.50
Project #4: Opposition to Defendants’ Motions to Dismiss. Lead Counsel prepared for and drafted an opposition to Defendants’ motions to dismiss the Complaint. Lead Counsel spent a total of 402.5 hours on this project with a lodestar of \$259,910.00. The work, the details of which are broken down chronologically below, included reviewing Defendants’ motions to dismiss, strategizing on the legal issues identified by Defendants, preparing an administrative motion for leave to file an omnibus opposition motion, opposing Defendants’ related request for judicial notice, performing extensive legal research on related issues, and drafting and filing the opposition brief on January 9, 2019.								
Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar	
08/16/2018	Jacob Spaid	Associate		04	1.00	\$475.00	\$475.00	
12/04/2018	Jacob Spaid	Associate		04	2.75	\$475.00	\$1,306.25	

12/05/2018	Jacob Spaid	Associate		04	5.25	\$475.00	\$2,493.75
12/06/2018	Jacob Spaid	Associate		04	2.25	\$475.00	\$1,068.75
12/14/2018	David Stickney	Partner		04	0.25	\$975.00	\$243.75
12/18/2018	Dena Bielasz	Case Managers		04	0.50	\$335.00	\$167.50
12/18/2018	Lucas Gilmore	Senior Counsel		04	2.25	\$775.00	\$1,743.75
12/20/2018	David Stickney	Partner		04	0.25	\$975.00	\$243.75
12/21/2018	David Stickney	Partner		04	0.25	\$975.00	\$243.75
12/24/2018	Lucas Gilmore	Senior Counsel		04	2.25	\$775.00	\$1,743.75
12/26/2018	Lucas Gilmore	Senior Counsel		04	2.75	\$775.00	\$2,131.25
12/26/2018	Lucas Gilmore	Senior Counsel		04	2.50	\$775.00	\$1,937.50
12/26/2018	David Stickney	Partner		04	1.00	\$975.00	\$975.00
12/27/2018	Dena Bielasz	Case Managers		04	2.25	\$335.00	\$753.75
12/27/2018	Jacob Spaid	Associate		04	2.25	\$475.00	\$1,068.75
12/27/2018	Jose Echegaray	Case Managers		04	0.50	\$350.00	\$175.00
12/27/2018	Jose Echegaray	Case Managers		04	2.00	\$350.00	\$700.00
12/27/2018	Julia Tebor	Associate		04	3.00	\$575.00	\$1,725.00

12/27/2018	Lucas Gilmore	Senior Counsel		04	11.50	\$775.00	\$8,912.50
12/27/2018	Rebecca Boon	Partner		04	2.00	\$875.00	\$1,750.00
12/27/2018	David Stickney	Partner		04	2.00	\$975.00	\$1,950.00
12/28/2018	Dena Bielasz	Case Managers		04	1.00	\$335.00	\$335.00
12/28/2018	Jacob Spaid	Associate		04	5.75	\$475.00	\$2,731.25
12/28/2018	Julia Tebor	Associate		04	4.00	\$575.00	\$2,300.00
12/28/2018	Lucas Gilmore	Senior Counsel		04	11.00	\$775.00	\$8,525.00
12/28/2018	Rebecca Boon	Partner		04	3.00	\$875.00	\$2,625.00
12/28/2018	David Stickney	Partner		04	4.00	\$975.00	\$3,900.00
12/29/2018	Jacob Spaid	Associate		04	4.75	\$475.00	\$2,256.25

12/29/2018	Lucas Gilmore	Senior Counsel		04	6.00	\$775.00	\$4,650.00
12/29/2018	David Stickney	Partner		04	2.00	\$975.00	\$1,950.00
12/30/2018	Jacob Spaid	Associate		04	6.50	\$475.00	\$3,087.50
12/30/2018	Lucas Gilmore	Senior Counsel		04	5.25	\$775.00	\$4,068.75
12/30/2018	David Stickney	Partner		04	1.50	\$975.00	\$1,462.50
12/31/2018	Dena Bielasz	Case Managers		04	2.00	\$335.00	\$670.00
12/31/2018	Jacob Spaid	Associate		04	4.25	\$475.00	\$2,018.75
12/31/2018	Lucas Gilmore	Senior Counsel		04	4.25	\$775.00	\$3,293.75
12/31/2018	David Stickney	Partner		04	2.00	\$975.00	\$1,950.00
01/01/2019	Jacob Spaid	Associate		04	3.75	\$475.00	\$1,781.25
01/01/2019	Lucas Gilmore	Senior Counsel		04	5.25	\$775.00	\$4,068.75
01/01/2019	David Stickney	Partner		04	0.50	\$975.00	\$487.50
01/02/2019	Jacob Spaid	Associate		04	10.25	\$475.00	\$4,868.75
01/02/2019	Julia Tebor	Associate		04	8.00	\$575.00	\$4,600.00

01/02/2019	Lucas Gilmore	Senior Counsel		04	6.75	\$775.00	\$5,231.25
01/02/2019	Rebecca Boon	Partner		04	1.50	\$875.00	\$1,312.50
01/02/2019	David Stickney	Partner		04	1.75	\$975.00	\$1,706.25
01/03/2019	Dena Bielasz	Case Managers		04	1.00	\$335.00	\$335.00
01/03/2019	Jacob Spaid	Associate		04	0.25	\$475.00	\$118.75
01/03/2019	Jacob Spaid	Associate		04	10.50	\$475.00	\$4,987.50
01/03/2019	Lucas Gilmore	Senior Counsel		04	9.75	\$775.00	\$7,556.25
01/03/2019	David Stickney	Partner		04	1.25	\$975.00	\$1,218.75
01/04/2019	Dena Bielasz	Case Managers		04	6.00	\$335.00	\$2,010.00
01/04/2019	Jacob Spaid	Associate		04	12.25	\$475.00	\$5,818.75
01/04/2019	Julia Tebor	Associate		04	5.50	\$575.00	\$3,162.50
01/04/2019	Lucas Gilmore	Senior Counsel		04	11.00	\$775.00	\$8,525.00
01/04/2019	Rebecca Boon	Partner		04	1.00	\$875.00	\$875.00
01/04/2019	David Stickney	Partner		04	1.00	\$975.00	\$975.00
01/05/2019	Jacob Spaid	Associate		04	2.25	\$475.00	\$1,068.75
01/05/2019	Jacob Spaid	Associate		04	5.75	\$475.00	\$2,731.25

01/05/2019	Lucas Gilmore	Senior Counsel		04	6.75	\$775.00	\$5,231.25
01/05/2019	David Stickney	Partner		04	5.00	\$975.00	\$4,875.00
01/06/2019	Jacob Spaid	Associate		04	12.25	\$475.00	\$5,818.75
01/06/2019	Lucas Gilmore	Senior Counsel		04	9.75	\$775.00	\$7,556.25
01/06/2019	Rebecca Boon	Partner		04	2.00	\$875.00	\$1,750.00
01/06/2019	David Stickney	Partner		04	6.00	\$975.00	\$5,850.00
01/07/2019	Dena Bielasz	Case Managers		04	4.75	\$335.00	\$1,591.25
01/07/2019	Jacob Spaid	Associate		04	0.75	\$475.00	\$356.25
01/07/2019	Jacob Spaid	Associate		04	10.50	\$475.00	\$4,987.50
01/07/2019	Jose Echegaray	Case Managers		04	0.25	\$350.00	\$87.50
01/07/2019	Julia Tebor	Associate		04	8.75	\$575.00	\$5,031.25

01/07/2019	Lucas Gilmore	Senior Counsel		04	12.50	\$775.00	\$9,687.50
01/07/2019	Rebecca Boon	Partner		04	3.50	\$875.00	\$3,062.50
01/07/2019	David Stickney	Partner		04	4.00	\$975.00	\$3,900.00
01/08/2019	Dena Bielasz	Case Managers		04	7.00	\$335.00	\$2,345.00
01/08/2019	Jacob Spaid	Associate		04	13.00	\$475.00	\$6,175.00
01/08/2019	Jose Echegaray	Case Managers		04	0.25	\$350.00	\$87.50
01/08/2019	Julia Tebor	Associate		04	7.00	\$575.00	\$4,025.00
01/08/2019	Lucas Gilmore	Senior Counsel		04	11.50	\$775.00	\$8,912.50
01/08/2019	Rebecca Boon	Partner		04	5.50	\$875.00	\$4,812.50
01/08/2019	David Stickney	Partner		04	5.00	\$975.00	\$4,875.00

01/09/2019	Dena Bielasz	Case Managers		04	10.25	\$335.00	\$3,433.75
01/09/2019	Jacob Spaid	Associate		04	10.25	\$475.00	\$4,868.75
01/09/2019	Jose Echegaray	Case Managers		04	0.50	\$350.00	\$175.00
01/09/2019	Julia Tebor	Associate		04	3.00	\$575.00	\$1,725.00
01/09/2019	Lucas Gilmore	Senior Counsel		04	12.25	\$775.00	\$9,493.75
01/09/2019	Rebecca Boon	Partner		04	6.50	\$875.00	\$5,687.50
01/09/2019	David Stickney	Partner		04	2.50	\$975.00	\$2,437.50
				TOTALS FOR PROJECT #4:		402.50	

Project #5: Oral Argument on Defendants' Motions to Dismiss. In addition, Lead Counsel spent a total of 127.5 hours, with a lodestar of \$95,372.50, in preparing for the Court's hearing on the motion to dismiss, which was held on January 31, 2019. The work, the details of which are broken down chronologically below, included reviewing the briefing submitted by the Parties, including Defendants' reply papers, analyzing case law and preparing for oral argument, participating in oral argument, and communicating with SEB regarding these matters.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
01/10/2019	Dena Bielasz	Case Managers		05	4.00	\$335.00	\$1,340.00
01/10/2019	Jacob Spaid	Associate		05	6.75	\$475.00	\$3,206.25
01/10/2019	Lucas Gilmore	Senior Counsel		05	2.25	\$775.00	\$1,743.75
01/10/2019	David Stickney	Partner		05	0.50	\$975.00	\$487.50
01/11/2019	David Stickney	Partner		05	0.25	\$975.00	\$243.75
01/14/2019	David Stickney	Partner		05	0.25	\$975.00	\$243.75
01/15/2019	Jacob Spaid	Associate		05	5.50	\$475.00	\$2,612.50

01/15/2019	David Stickney	Partner		05	0.25	\$975.00	\$243.75
01/16/2019	Dena Bielasz	Case Managers		05	1.00	\$335.00	\$335.00
01/16/2019	Lucas Gilmore	Senior Counsel		05	2.50	\$775.00	\$1,937.50
01/16/2019	Rebecca Boon	Partner		05	2.00	\$875.00	\$1,750.00
01/16/2019	David Stickney	Partner		05	0.50	\$975.00	\$487.50
01/17/2019	Jose Echegaray	Case Managers		05	2.50	\$350.00	\$875.00
01/17/2019	Jose Echegaray	Case Managers		05	1.00	\$350.00	\$350.00
01/17/2019	Julia Tebor	Associate		05	2.00	\$575.00	\$1,150.00
01/17/2019	David Stickney	Partner		05	0.25	\$975.00	\$243.75
01/18/2019	David Stickney	Partner		05	0.25	\$975.00	\$243.75
01/19/2019	David Stickney	Partner		05	1.00	\$975.00	\$975.00
01/21/2019	David Stickney	Partner		05	1.00	\$975.00	\$975.00
01/22/2019	Jacob Spaid	Associate		05	2.75	\$475.00	\$1,306.25
01/22/2019	David Stickney	Partner		05	1.00	\$975.00	\$975.00
01/23/2019	Dena Bielasz	Case Managers		05	3.50	\$335.00	\$1,172.50
01/23/2019	Jose Echegaray	Case Managers		05	0.25	\$350.00	\$87.50
01/23/2019	David Stickney	Partner		05	1.00	\$975.00	\$975.00
01/24/2019	Dena Bielasz	Case Managers		05	6.50	\$335.00	\$2,177.50
01/24/2019	Rebecca Boon	Partner		05	2.00	\$875.00	\$1,750.00
01/24/2019	David Stickney	Partner		05	1.00	\$975.00	\$975.00
01/25/2019	Dena Bielasz	Case Managers		05	1.00	\$335.00	\$335.00
01/25/2019	Rebecca Boon	Partner		05	1.00	\$875.00	\$875.00
01/25/2019	David Stickney	Partner		05	2.00	\$975.00	\$1,950.00

01/26/2019	David Stickney	Partner		05	5.00	\$975.00	\$4,875.00
01/27/2019	David Stickney	Partner		05	6.00	\$975.00	\$5,850.00
01/28/2019	Jose Echegaray	Case Managers		05	0.25	\$350.00	\$87.50
01/28/2019	Lucas Gilmore	Senior Counsel		05	8.50	\$775.00	\$6,587.50
01/28/2019	Rebecca Boon	Partner		05	4.00	\$875.00	\$3,500.00
01/28/2019	David Stickney	Partner		05	6.00	\$975.00	\$5,850.00
01/29/2019	Lucas Gilmore	Senior Counsel		05	5.50	\$775.00	\$4,262.50
01/29/2019	Rebecca Boon	Partner		05	3.00	\$875.00	\$2,625.00
01/29/2019	David Stickney	Partner		05	7.00	\$975.00	\$6,825.00
01/30/2019	Lucas Gilmore	Senior Counsel		05	8.25	\$775.00	\$6,393.75
01/30/2019	David Stickney	Partner		05	6.50	\$975.00	\$6,337.50
01/31/2019	Lucas Gilmore	Senior Counsel		05	6.25	\$775.00	\$4,843.75
01/31/2019	Rebecca Boon	Partner		05	0.50	\$875.00	\$437.50
01/31/2019	David Stickney	Partner		05	4.75	\$975.00	\$4,631.25
02/04/2019	David Stickney	Partner		05	0.25	\$975.00	\$243.75
				TOTALS FOR PROJECT #5:			127.50

Project #6: Amended Complaint. While the Court's opinion on the motions to dismiss was pending and after dismissal was granted, Lead Counsel continued its investigation into Symantec and drafted the Amended Complaint. Lead Counsel spent a total of 1,127.50 hours, with a lodestar of \$673,937.50 on this project. The work, the details of which are broken down chronologically below, included extensive further investigative efforts, including identifying, locating, and interviewing numerous additional former Symantec employees; preparing memoranda of the witness interviews; reviewing numerous Symantec filings, analyst reports, media publications, and industry reports; filing a motion to unseal a related derivative action; researching the law; and drafting and filing the Amended Complaint.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/16/2018	David Stickney	Partner		06	0.25	\$975.00	\$243.75
11/16/2018	Jose Echegaray	Case Managers		06	0.25	\$350.00	\$87.50
11/19/2018	Amy Bitkower	Director of Investigations		06	0.50	\$575.00	\$287.50
11/19/2018	Joelle Landino	Investigator		06	1.00	\$425.00	\$425.00
11/20/2018	David Stickney	Partner		06	0.50	\$975.00	\$487.50

11/20/2018	Amy Bitkower	Director of Investigations		06	0.25	\$575.00	\$143.75
12/03/2018	Rebecca Boon	Partner		06	0.50	\$875.00	\$437.50
12/03/2018	David Stickney	Partner		06	0.50	\$975.00	\$487.50
12/03/2018	Jacob Spaid	Associate		06	1.25	\$475.00	\$593.75
12/04/2018	David Stickney	Partner		06	0.25	\$975.00	\$243.75
12/06/2018	Rebecca Boon	Partner		06	1.00	\$875.00	\$875.00
12/06/2018	David Stickney	Partner		06	0.75	\$975.00	\$731.25
12/06/2018	Amy Bitkower	Director of Investigations		06	0.25	\$575.00	\$143.75
12/06/2018	Jacob Spaid	Associate		06	0.50	\$475.00	\$237.50
12/06/2018	Joelle Landino	Investigator		06	0.50	\$425.00	\$212.50
12/06/2018	Lucas Gilmore	Senior Counsel		06	2.00	\$775.00	\$1,550.00
12/07/2018	David Stickney	Partner		06	0.25	\$975.00	\$243.75
12/07/2018	Amy Bitkower	Director of Investigations		06	1.00	\$575.00	\$575.00
12/07/2018	Joelle Landino	Investigator		06	1.25	\$425.00	\$531.25
12/24/2018	David Stickney	Partner		06	0.25	\$975.00	\$243.75
01/02/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
01/15/2019	David Stickney	Partner		06	0.25	\$975.00	\$243.75
01/16/2019	Amy Bitkower	Director of Investigations		06	2.00	\$575.00	\$1,150.00
01/16/2019	Jacob Foster	Investigator		06	2.00	\$300.00	\$600.00
01/16/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
01/18/2019	Lucas Gilmore	Senior Counsel		06	1.00	\$775.00	\$775.00
01/28/2019	Jacob Foster	Investigator		06	1.50	\$300.00	\$450.00
01/29/2019	Jacob Foster	Investigator		06	2.00	\$300.00	\$600.00
01/29/2019	Joelle Landino	Investigator		06	3.50	\$425.00	\$1,487.50
01/30/2019	Jacob Foster	Investigator		06	4.00	\$300.00	\$1,200.00
01/30/2019	Jacob Foster	Investigator		06	2.00	\$300.00	\$600.00
01/30/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
01/30/2019	David Stickney	Partner		06	1.00	\$975.00	\$975.00

01/31/2019	Joelle Landino	Investigator		06	1.00	\$425.00	\$425.00
01/31/2019	Rebecca Boon	Partner		06	0.50	\$875.00	\$437.50
02/01/2019	Joelle Landino	Investigator		06	2.75	\$425.00	\$1,168.75
02/01/2019	David Stickney	Partner		06	3.00	\$975.00	\$2,925.00
02/04/2019	Joelle Landino	Investigator		06	5.75	\$425.00	\$2,443.75
02/04/2019	David Stickney	Partner		06	0.25	\$975.00	\$243.75
02/05/2019	Joelle Landino	Investigator		06	7.50	\$425.00	\$3,187.50
02/05/2019	Rebecca Boon	Partner		06	0.50	\$875.00	\$437.50
02/06/2019	Joelle Landino	Investigator		06	4.00	\$425.00	\$1,700.00
02/06/2019	David Stickney	Partner		06	1.00	\$975.00	\$975.00
02/07/2019	Joelle Landino	Investigator		06	6.50	\$425.00	\$2,762.50
02/07/2019	David Stickney	Partner		06	0.50	\$975.00	\$487.50
02/08/2019	Joelle Landino	Investigator		06	7.00	\$425.00	\$2,975.00
02/08/2019	Rebecca Boon	Partner		06	0.25	\$875.00	\$218.75
02/11/2019	Joelle Landino	Investigator		06	3.50	\$425.00	\$1,487.50
02/11/2019	Rebecca Boon	Partner		06	0.25	\$875.00	\$218.75
02/12/2019	Amy Bitkower	Director of Investigations		06	1.00	\$575.00	\$575.00
02/12/2019	Joelle Landino	Investigator		06	6.75	\$425.00	\$2,868.75
02/13/2019	Amy Bitkower	Director of Investigations		06	0.50	\$575.00	\$287.50
02/13/2019	Joelle Landino	Investigator		06	2.00	\$425.00	\$850.00
02/13/2019	Jose Echegaray	Case Managers		06	1.50	\$350.00	\$525.00

02/13/2019	Rebecca Boon	Partner		06	1.00	\$875.00	\$875.00
02/14/2019	Lucas Gilmore	Senior Counsel		06	1.00	\$775.00	\$775.00
02/14/2019	Rebecca Boon	Partner		06	1.00	\$875.00	\$875.00
02/15/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
02/15/2019	Lucas Gilmore	Senior Counsel		06	2.25	\$775.00	\$1,743.75
02/19/2019	Jose Echegaray	Case Managers		06	0.25	\$350.00	\$87.50
02/20/2019	Jacob Spaid	Associate		06	0.75	\$475.00	\$356.25
02/20/2019	Joelle Landino	Investigator		06	1.25	\$425.00	\$531.25
02/21/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
02/25/2019	Jose Echegaray	Case Managers		06	1.00	\$350.00	\$350.00
02/25/2019	Rebecca Boon	Partner		06	1.50	\$875.00	\$1,312.50
02/26/2019	Jose Echegaray	Case Managers		06	2.00	\$350.00	\$700.00
02/26/2019	Jose Echegaray	Case Managers		06	0.50	\$350.00	\$175.00
02/27/2019	Joelle Landino	Investigator		06	2.00	\$425.00	\$850.00
02/27/2019	Jose Echegaray	Case Managers		06	0.50	\$350.00	\$175.00
02/28/2019	Joelle Landino	Investigator		06	0.50	\$425.00	\$212.50
03/01/2019	Joelle Landino	Investigator		06	0.50	\$425.00	\$212.50
03/04/2019	Joelle Landino	Investigator		06	0.50	\$425.00	\$212.50
03/05/2019	Joelle Landino	Investigator		06	2.50	\$425.00	\$1,062.50
03/05/2019	Jose Echegaray	Case Managers		06	1.25	\$350.00	\$437.50
03/05/2019	Lucas Gilmore	Senior Counsel		06	0.25	\$775.00	\$193.75
03/05/2019	Rebecca Boon	Partner		06	7.00	\$875.00	\$6,125.00
03/06/2019	Joelle Landino	Investigator		06	2.25	\$425.00	\$956.25
03/07/2019	Joelle Landino	Investigator		06	4.25	\$425.00	\$1,806.25

03/11/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
03/12/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
03/13/2019	Julia Tebor	Associate		06	1.00	\$575.00	\$575.00
03/14/2019	Rebecca Boon	Partner		06	1.00	\$875.00	\$875.00
03/15/2019	Joelle Landino	Investigator		06	0.50	\$425.00	\$212.50
03/18/2019	Julia Tebor	Associate		06	4.00	\$575.00	\$2,300.00
03/19/2019	Joelle Landino	Investigator		06	0.50	\$425.00	\$212.50
03/20/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
03/20/2019	Julia Tebor	Associate		06	1.50	\$575.00	\$862.50
03/21/2019	Joelle Landino	Investigator		06	0.75	\$425.00	\$318.75
03/21/2019	Julia Tebor	Associate		06	4.00	\$575.00	\$2,300.00
03/22/2019	Amy Bitkower	Director of Investigations		06	1.00	\$575.00	\$575.00
03/25/2019	Amy Bitkower	Director of Investigations		06	0.50	\$575.00	\$287.50
03/25/2019	Jacob Foster	Investigator		06	3.00	\$300.00	\$900.00
03/25/2019	Joelle Landino	Investigator		06	2.00	\$425.00	\$850.00
03/25/2019	Julia Tebor	Associate		06	2.50	\$575.00	\$1,437.50
03/25/2019	Rebecca Boon	Partner		06	1.00	\$875.00	\$875.00
03/26/2019	Jacob Foster	Investigator		06	1.50	\$300.00	\$450.00
03/26/2019	Julia Tebor	Associate		06	3.00	\$575.00	\$1,725.00
03/27/2019	Julia Tebor	Associate		06	2.00	\$575.00	\$1,150.00
03/29/2019	Joelle Landino	Investigator		06	2.25	\$425.00	\$956.25
03/29/2019	Jose Echegaray	Case Managers		06	2.00	\$350.00	\$700.00
03/29/2019	Julia Tebor	Associate		06	3.50	\$575.00	\$2,012.50
04/01/2019	Joelle Landino	Investigator		06	0.75	\$425.00	\$318.75
04/01/2019	Jose Echegaray	Case Managers		06	1.00	\$350.00	\$350.00
04/04/2019	Julia Tebor	Associate		06	1.00	\$575.00	\$575.00
04/11/2019	Joelle Landino	Investigator		06	0.75	\$425.00	\$318.75
04/15/2019	Jacob Foster	Investigator		06	2.25	\$300.00	\$675.00
04/18/2019	Joelle Landino	Investigator		06	6.25	\$425.00	\$2,656.25
04/19/2019	Amy Bitkower	Director of Investigations		06	3.00	\$575.00	\$1,725.00
04/19/2019	Joelle Landino	Investigator		06	6.00	\$425.00	\$2,550.00

04/22/2019	Joelle Landino	Investigator		06	6.75	\$425.00	\$2,868.75
04/23/2019	Amy Bitkower	Director of Investigations		06	1.00	\$575.00	\$575.00
04/23/2019	Joelle Landino	Investigator		06	8.00	\$425.00	\$3,400.00
04/24/2019	Amy Bitkower	Director of Investigations		06	1.50	\$575.00	\$862.50
04/24/2019	Joelle Landino	Investigator		06	7.00	\$425.00	\$2,975.00
04/25/2019	Amy Bitkower	Director of Investigations		06	3.00	\$575.00	\$1,725.00
04/25/2019	Joelle Landino	Investigator		06	8.50	\$425.00	\$3,612.50
04/26/2019	Joelle Landino	Investigator		06	7.50	\$425.00	\$3,187.50
04/27/2019	Joelle Landino	Investigator		06	1.25	\$425.00	\$531.25
04/29/2019	Joelle Landino	Investigator		06	7.00	\$425.00	\$2,975.00
04/30/2019	Amy Bitkower	Director of Investigations		06	1.00	\$575.00	\$575.00
04/30/2019	Joelle Landino	Investigator		06	6.00	\$425.00	\$2,550.00
05/01/2019	Joelle Landino	Investigator		06	5.50	\$425.00	\$2,337.50
05/02/2019	Joelle Landino	Investigator		06	8.25	\$425.00	\$3,506.25
05/03/2019	Joelle Landino	Investigator		06	7.25	\$425.00	\$3,081.25
05/03/2019	Rebecca Boon	Partner		06	0.50	\$875.00	\$437.50

05/05/2019	Joelle Landino	Investigator		06	1.00	\$425.00	\$425.00
05/06/2019	Joelle Landino	Investigator		06	5.75	\$425.00	\$2,443.75
05/07/2019	Amy Bitkower	Director of Investigations		06	1.00	\$575.00	\$575.00
05/07/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
05/09/2019	Jose Echegaray	Case Managers		06	0.50	\$350.00	\$175.00
05/09/2019	Jose Echegaray	Case Managers		06	0.50	\$350.00	\$175.00
05/10/2019	Jose Echegaray	Case Managers		06	0.25	\$350.00	\$87.50
05/13/2019	Jose Echegaray	Case Managers		06	0.75	\$350.00	\$262.50
05/15/2019	Jose Echegaray	Case Managers		06	0.50	\$350.00	\$175.00
05/15/2019	Julia Tebor	Associate		06	6.00	\$575.00	\$3,450.00
05/16/2019	Joelle Landino	Investigator		06	0.50	\$425.00	\$212.50
05/16/2019	Julia Tebor	Associate		06	3.00	\$575.00	\$1,725.00
05/17/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
05/20/2019	Joelle Landino	Investigator		06	0.50	\$425.00	\$212.50
05/20/2019	Jose Echegaray	Case Managers		06	0.50	\$350.00	\$175.00
05/23/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
05/28/2019	Joelle Landino	Investigator		06	0.75	\$425.00	\$318.75
05/29/2019	Jose Echegaray	Case Managers		06	0.75	\$350.00	\$262.50
05/30/2019	Amy Bitkower	Director of Investigations		06	3.00	\$575.00	\$1,725.00
05/30/2019	Joelle Landino	Investigator		06	3.50	\$425.00	\$1,487.50
05/30/2019	Lewis Smith	Staff Attorney		06	10.25	\$400.00	\$4,100.00
05/31/2019	Amy Bitkower	Director of Investigations		06	4.00	\$575.00	\$2,300.00
05/31/2019	Joelle Landino	Investigator		06	1.50	\$425.00	\$637.50
06/08/2019	Lewis Smith	Staff Attorney		06	6.00	\$400.00	\$2,400.00
06/10/2019	Lewis Smith	Staff Attorney		06	11.25	\$400.00	\$4,500.00
06/13/2019	Joelle Landino	Investigator		06	0.75	\$425.00	\$318.75
06/15/2019	Jeremy Robinson	Partner		06	6.00	\$900.00	\$5,400.00
06/16/2019	Jeremy Robinson	Partner		06	7.00	\$900.00	\$6,300.00

06/17/2019	Amy Bitkower	Director of Investigations		06	3.00	\$575.00	\$1,725.00
06/17/2019	Jacob Foster	Investigator		06	2.00	\$300.00	\$600.00
06/17/2019	Joelle Landino	Investigator		06	4.75	\$425.00	\$2,018.75
06/17/2019	Jose Echegaray	Case Managers		06	0.50	\$350.00	\$175.00
06/17/2019	Jeremy Robinson	Partner		06	9.00	\$900.00	\$8,100.00
06/17/2019	Rebecca Boon	Partner		06	5.00	\$875.00	\$4,375.00
06/18/2019	Jacob Foster	Investigator		06	1.75	\$300.00	\$525.00
06/18/2019	Joelle Landino	Investigator		06	5.50	\$425.00	\$2,337.50
06/18/2019	Julia Tebor	Associate		06	4.00	\$575.00	\$2,300.00
06/18/2019	Rebecca Boon	Partner		06	1.50	\$875.00	\$1,312.50
06/19/2019	Amy Bitkower	Director of Investigations		06	4.00	\$575.00	\$2,300.00
06/19/2019	Jacob Foster	Investigator		06	3.00	\$300.00	\$900.00
06/19/2019	Joelle Landino	Investigator		06	8.25	\$425.00	\$3,506.25
06/19/2019	Jose Echegaray	Case Managers		06	3.50	\$350.00	\$1,225.00
06/19/2019	Julia Tebor	Associate		06	3.00	\$575.00	\$1,725.00
06/19/2019	Jeremy Robinson	Partner		06	11.00	\$900.00	\$9,900.00
06/19/2019	Rebecca Boon	Partner		06	2.50	\$875.00	\$2,187.50
06/20/2019	Amy Bitkower	Director of Investigations		06	2.00	\$575.00	\$1,150.00
06/20/2019	Jacob Foster	Investigator		06	3.00	\$300.00	\$900.00

06/20/2019	Joelle Landino	Investigator		06	8.50	\$425.00	\$3,612.50
06/20/2019	Julia Tebor	Associate		06	4.00	\$575.00	\$2,300.00
06/20/2019	Jeremy Robinson	Partner		06	10.00	\$900.00	\$9,000.00
06/20/2019	Salvatore Graziano	Partner		06	4.00	\$1,150.00	\$4,600.00
06/21/2019	Amy Bitkower	Director of Investigations		06	2.00	\$575.00	\$1,150.00
06/21/2019	Joelle Landino	Investigator		06	6.25	\$425.00	\$2,656.25
06/21/2019	Jose Echegaray	Case Managers		06	2.50	\$350.00	\$875.00
06/21/2019	Jose Echegaray	Case Managers		06	1.75	\$350.00	\$612.50
06/21/2019	Julia Tebor	Associate		06	3.00	\$575.00	\$1,725.00
06/21/2019	Jeremy Robinson	Partner		06	9.50	\$900.00	\$8,550.00
06/21/2019	Salvatore Graziano	Partner		06	7.50	\$1,150.00	\$8,625.00
06/21/2019	Rebecca Boon	Partner		06	6.50	\$875.00	\$5,687.50
06/22/2019	Julia Tebor	Associate		06	1.00	\$575.00	\$575.00
06/22/2019	Lewis Smith	Staff Attorney		06	11.50	\$400.00	\$4,600.00
06/22/2019	Jeremy Robinson	Partner		06	10.00	\$900.00	\$9,000.00
06/22/2019	Rebecca Boon	Partner		06	4.00	\$875.00	\$3,500.00
06/23/2019	Amy Bitkower	Director of Investigations		06	2.00	\$575.00	\$1,150.00
06/23/2019	Andrew Thompson	Investigator		06	2.00	\$400.00	\$800.00
06/23/2019	Lewis Smith	Staff Attorney		06	11.75	\$400.00	\$4,700.00
06/23/2019	Jeremy Robinson	Partner		06	6.50	\$900.00	\$5,850.00
06/23/2019	Rebecca Boon	Partner		06	7.50	\$875.00	\$6,562.50

06/24/2019	Amy Bitkower	Director of Investigations		06	4.00	\$575.00	\$2,300.00
06/24/2019	Andrew Thompson	Investigator		06	6.00	\$400.00	\$2,400.00
06/24/2019	Jacob Foster	Investigator		06	3.50	\$300.00	\$1,050.00
06/24/2019	Joelle Landino	Investigator		06	9.50	\$425.00	\$4,037.50
06/24/2019	Julia Tebor	Associate		06	4.00	\$575.00	\$2,300.00
06/24/2019	Mahiri Buffong	Managing Clerk		06	6.75	\$375.00	\$2,531.25
06/24/2019	Ryan Dykhous	Associate		06	5.00	\$425.00	\$2,125.00
06/24/2019	Salvatore Graziano	Partner		06	5.50	\$1,150.00	\$6,325.00
06/24/2019	Rebecca Boon	Partner		06	6.50	\$875.00	\$5,687.50
06/25/2019	Amy Bitkower	Director of Investigations		06	3.00	\$575.00	\$1,725.00
06/25/2019	Andrew Thompson	Investigator		06	8.00	\$400.00	\$3,200.00
06/25/2019	Jacob Foster	Investigator		06	1.50	\$300.00	\$450.00
06/25/2019	Joelle Landino	Investigator		06	8.50	\$425.00	\$3,612.50
06/25/2019	Julia Tebor	Associate		06	4.00	\$575.00	\$2,300.00
06/25/2019	Mahiri Buffong	Managing Clerk		06	9.00	\$375.00	\$3,375.00
06/25/2019	Michelle Leung	Case Managers		06	1.50	\$350.00	\$525.00
06/25/2019	Ryan Dykhous	Associate		06	4.50	\$425.00	\$1,912.50
06/25/2019	Salvatore Graziano	Partner		06	4.50	\$1,150.00	\$5,175.00

06/25/2019	Rebecca Boon	Partner		06	3.50	\$875.00	\$3,062.50
06/26/2019	Amy Bitkower	Director of Investigations		06	5.00	\$575.00	\$2,875.00
06/26/2019	Andrew Thompson	Investigator		06	6.50	\$400.00	\$2,600.00
06/26/2019	Joelle Landino	Investigator		06	7.75	\$425.00	\$3,293.75
06/26/2019	Julia Tebor	Associate		06	5.00	\$575.00	\$2,875.00
06/26/2019	Jeremy Robinson	Partner		06	11.00	\$900.00	\$9,900.00
06/26/2019	Salvatore Graziano	Partner		06	3.50	\$1,150.00	\$4,025.00
06/26/2019	Max Berger	Partner		06	3.25	\$1,300.00	\$4,225.00
06/26/2019	Rebecca Boon	Partner		06	7.00	\$875.00	\$6,125.00
06/27/2019	Amy Bitkower	Director of Investigations		06	3.00	\$575.00	\$1,725.00
06/27/2019	Andrew Thompson	Investigator		06	5.00	\$400.00	\$2,000.00
06/27/2019	Jacob Foster	Investigator		06	0.50	\$300.00	\$150.00
06/27/2019	Jacob Foster	Investigator		06	3.00	\$300.00	\$900.00
06/27/2019	Joelle Landino	Investigator		06	7.50	\$425.00	\$3,187.50
06/27/2019	Julia Tebor	Associate		06	5.00	\$575.00	\$2,875.00
06/27/2019	Jeremy Robinson	Partner		06	10.00	\$900.00	\$9,000.00
06/27/2019	Rebecca Boon	Partner		06	7.50	\$875.00	\$6,562.50
06/28/2019	Amy Bitkower	Director of Investigations		06	1.00	\$575.00	\$575.00
06/28/2019	Andrew Thompson	Investigator		06	1.00	\$400.00	\$400.00
06/28/2019	Jacob Foster	Investigator		06	4.00	\$300.00	\$1,200.00
06/28/2019	Jacob Foster	Investigator		06	0.50	\$300.00	\$150.00

06/28/2019	Joelle Landino	Investigator		06	10.00	\$425.00	\$4,250.00
06/28/2019	Julia Tebor	Associate		06	3.00	\$575.00	\$1,725.00
06/28/2019	Jeremy Robinson	Partner		06	10.00	\$900.00	\$9,000.00
06/28/2019	Rebecca Boon	Partner		06	7.50	\$875.00	\$6,562.50
06/29/2019	Amy Bitkower	Director of Investigations		06	1.00	\$575.00	\$575.00
06/29/2019	Jeremy Robinson	Partner		06	9.00	\$900.00	\$8,100.00
06/29/2019	Rebecca Boon	Partner		06	2.50	\$875.00	\$2,187.50
06/30/2019	Amy Bitkower	Director of Investigations		06	3.00	\$575.00	\$1,725.00
06/30/2019	Julia Tebor	Associate		06	3.00	\$575.00	\$1,725.00
06/30/2019	Jeremy Robinson	Partner		06	10.50	\$900.00	\$9,450.00
06/30/2019	Rebecca Boon	Partner		06	5.50	\$875.00	\$4,812.50
07/01/2019	Andrew Thompson	Investigator		06	4.00	\$400.00	\$1,600.00
07/01/2019	Julia Tebor	Associate		06	2.00	\$575.00	\$1,150.00
07/01/2019	Jeremy Robinson	Partner		06	11.00	\$900.00	\$9,900.00
07/01/2019	Salvatore Graziano	Partner		06	4.00	\$1,150.00	\$4,600.00
07/01/2019	Rebecca Boon	Partner		06	2.50	\$875.00	\$2,187.50
07/02/2019	Andrew Thompson	Investigator		06	3.00	\$400.00	\$1,200.00
07/02/2019	Julia Tebor	Associate		06	9.00	\$575.00	\$5,175.00
07/02/2019	Michelle Leung	Case Managers		06	0.25	\$350.00	\$87.50
07/02/2019	Jeremy Robinson	Partner		06	13.50	\$900.00	\$12,150.00
07/02/2019	Salvatore Graziano	Partner		06	4.50	\$1,150.00	\$5,175.00
07/02/2019	Rebecca Boon	Partner		06	4.25	\$875.00	\$3,718.75
07/03/2019	Amy Bitkower	Director of Investigations		06	2.00	\$575.00	\$1,150.00
07/03/2019	Andrew Thompson	Investigator		06	3.00	\$400.00	\$1,200.00
07/03/2019	Julia Tebor	Associate		06	3.00	\$575.00	\$1,725.00
07/03/2019	Jeremy Robinson	Partner		06	10.00	\$900.00	\$9,000.00
07/03/2019	Salvatore Graziano	Partner		06	3.50	\$1,150.00	\$4,025.00
07/03/2019	Rebecca Boon	Partner		06	3.50	\$875.00	\$3,062.50
07/04/2019	Ryan Dykhous	Associate		06	0.75	\$425.00	\$318.75
07/04/2019	Rebecca Boon	Partner		06	2.25	\$875.00	\$1,968.75
07/05/2019	Salvatore Graziano	Partner		06	1.50	\$1,150.00	\$1,725.00

07/05/2019	Rebecca Boon	Partner		06	2.50	\$875.00	\$2,187.50
07/06/2019	Rebecca Boon	Partner		06	2.50	\$875.00	\$2,187.50
07/07/2019	Ryan Dykhous	Associate		06	0.50	\$425.00	\$212.50
07/07/2019	Salvatore Graziano	Partner		06	1.50	\$1,150.00	\$1,725.00
07/07/2019	Rebecca Boon	Partner		06	2.25	\$875.00	\$1,968.75
07/08/2019	Amy Bitkower	Director of Investigations		06	4.00	\$575.00	\$2,300.00
07/08/2019	Andrew Thompson	Investigator		06	1.00	\$400.00	\$400.00
07/08/2019	Joelle Landino	Investigator		06	9.00	\$425.00	\$3,825.00
07/08/2019	Julia Tebor	Associate		06	6.50	\$575.00	\$3,737.50
07/08/2019	Ryan Dykhous	Associate		06	2.75	\$425.00	\$1,168.75
07/08/2019	Salvatore Graziano	Partner		06	3.50	\$1,150.00	\$4,025.00
07/08/2019	Rebecca Boon	Partner		06	3.75	\$875.00	\$3,281.25
07/09/2019	Amy Bitkower	Director of Investigations		06	3.00	\$575.00	\$1,725.00
07/09/2019	Joelle Landino	Investigator		06	7.00	\$425.00	\$2,975.00
07/09/2019	Julia Tebor	Associate		06	3.00	\$575.00	\$1,725.00
07/09/2019	Michelle Leung	Case Managers		06	0.50	\$350.00	\$175.00
07/09/2019	Salvatore Graziano	Partner		06	2.50	\$1,150.00	\$2,875.00
07/09/2019	Rebecca Boon	Partner		06	7.50	\$875.00	\$6,562.50
07/10/2019	Amy Bitkower	Director of Investigations		06	2.00	\$575.00	\$1,150.00
07/10/2019	Joelle Landino	Investigator		06	1.50	\$425.00	\$637.50
07/10/2019	Julia Tebor	Associate		06	4.50	\$575.00	\$2,587.50
07/10/2019	Michelle Leung	Case Managers		06	1.25	\$350.00	\$437.50
07/10/2019	Michelle Leung	Case Managers		06	1.25	\$350.00	\$437.50
07/10/2019	Salvatore Graziano	Partner		06	1.25	\$1,150.00	\$1,437.50
07/10/2019	Rebecca Boon	Partner		06	1.50	\$875.00	\$1,312.50
07/11/2019	Amy Bitkower	Director of Investigations		06	1.00	\$575.00	\$575.00

07/11/2019	Joelle Landino	Investigator		06	2.50	\$425.00	\$1,062.50
07/11/2019	Julia Tebor	Associate		06	2.50	\$575.00	\$1,437.50
07/11/2019	Michelle Leung	Case Managers		06	2.25	\$350.00	\$787.50
07/11/2019	Rebecca Boon	Partner		06	3.50	\$875.00	\$3,062.50
07/15/2019	Amy Bitkower	Director of Investigations		06	3.00	\$575.00	\$1,725.00
07/15/2019	Joelle Landino	Investigator		06	1.75	\$425.00	\$743.75
07/16/2019	Salvatore Graziano	Partner		06	2.50	\$1,150.00	\$2,875.00
07/17/2019	Amy Bitkower	Director of Investigations		06	4.00	\$575.00	\$2,300.00
07/17/2019	Andrew Thompson	Investigator		06	6.50	\$400.00	\$2,600.00
07/17/2019	Jacob Foster	Investigator		06	2.00	\$300.00	\$600.00
07/17/2019	Joelle Landino	Investigator		06	8.50	\$425.00	\$3,612.50
07/17/2019	Jose Echegaray	Case Managers		06	0.25	\$350.00	\$87.50
07/17/2019	Salvatore Graziano	Partner		06	1.00	\$1,150.00	\$1,150.00
07/17/2019	Rebecca Boon	Partner		06	1.00	\$875.00	\$875.00
07/18/2019	Amy Bitkower	Director of Investigations		06	4.00	\$575.00	\$2,300.00
07/18/2019	Andrew Thompson	Investigator		06	8.00	\$400.00	\$3,200.00
07/18/2019	Jacob Foster	Investigator		06	3.25	\$300.00	\$975.00

07/18/2019	Joelle Landino	Investigator		06	5.75	\$425.00	\$2,443.75
07/19/2019	Amy Bitkower	Director of Investigations		06	1.50	\$575.00	\$862.50
07/19/2019	Andrew Thompson	Investigator		06	6.00	\$400.00	\$2,400.00
07/19/2019	Jacob Foster	Investigator		06	3.00	\$300.00	\$900.00
07/19/2019	Jacob Foster	Investigator		06	3.50	\$300.00	\$1,050.00
07/19/2019	Michelle Leung	Case Managers		06	0.75	\$350.00	\$262.50
07/19/2019	Rebecca Boon	Partner		06	3.50	\$875.00	\$3,062.50
07/20/2019	Jose Echegaray	Case Managers		06	2.00	\$350.00	\$700.00
07/21/2019	Jose Echegaray	Case Managers		06	3.25	\$350.00	\$1,137.50
07/22/2019	Andrew Thompson	Investigator		06	8.00	\$400.00	\$3,200.00
07/22/2019	Jacob Foster	Investigator		06	4.00	\$300.00	\$1,200.00
07/22/2019	Jacob Foster	Investigator		06	4.00	\$300.00	\$1,200.00
07/22/2019	Joelle Landino	Investigator		06	9.75	\$425.00	\$4,143.75
07/22/2019	Rebecca Boon	Partner		06	4.50	\$875.00	\$3,937.50
07/23/2019	Andrew Thompson	Investigator		06	8.00	\$400.00	\$3,200.00
07/23/2019	Jacob Foster	Investigator		06	2.75	\$300.00	\$825.00
07/23/2019	Joelle Landino	Investigator		06	4.50	\$425.00	\$1,912.50
07/23/2019	Rebecca Boon	Partner		06	5.50	\$875.00	\$4,812.50
07/24/2019	Andrew Thompson	Investigator		06	3.00	\$400.00	\$1,200.00
07/25/2019	Andrew Thompson	Investigator		06	2.00	\$400.00	\$800.00
07/25/2019	Rebecca Boon	Partner		06	3.50	\$875.00	\$3,062.50
07/30/2019	Jacob Foster	Investigator		06	1.00	\$300.00	\$300.00
07/31/2019	Jacob Foster	Investigator		06	2.00	\$300.00	\$600.00
08/13/2019	Joelle Landino	Investigator		06	0.50	\$425.00	\$212.50
08/16/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
09/23/2019	Amy Bitkower	Director of Investigations		06	1.00	\$575.00	\$575.00

09/23/2019	Joelle Landino	Investigator		06	0.25	\$425.00	\$106.25
10/10/2019	Jose Echegaray	Case Managers		06	5.00	\$350.00	\$1,750.00
10/10/2019	Salvatore Graziano	Partner		06	2.00	\$1,150.00	\$2,300.00
10/11/2019	Jose Echegaray	Case Managers		06	5.00	\$350.00	\$1,750.00
10/11/2019	Michelle Leung	Case Managers		06	0.25	\$350.00	\$87.50
10/11/2019	Preya Rodriguez	Paralegal		06	1.25	\$325.00	\$406.25
			TOTALS FOR PROJECT #6:		1,127.50		\$673,937.50

Project #7: Motion to Partially Lift Discovery Stay. On June 28, 2019, Lead Plaintiff filed a motion for inter alia a partial modification of the PSLRA discovery stay that would allow Lead Plaintiff access to documents quoted in the shareholder derivative complaint filed in the Derivative Action (i.e., Lee v. Clark, et al., No. 3:19-cv-02522-WHA (N.D. Cal.)). Lead Counsel spent a total of 66.5 hours with a lodestar of \$31,212.50 on this project. The work, the details of which are broken down chronologically below, included research, drafting, and filing the motion and preparing an accompanying declaration, reviewing Defendants' opposition, and preparing a withdrawal of the motion when it became moot.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
06/21/2019	Ryan Dykhous	Associate		07	6.25	\$425.00	\$2,656.25
06/23/2019	Ryan Dykhous	Associate		07	4.00	\$425.00	\$1,700.00
06/24/2019	Ryan Dykhous	Associate		07	7.50	\$425.00	\$3,187.50
06/25/2019	Salvatore Graziano	Partner		07	1.00	\$1,150.00	\$1,150.00
06/25/2019	Ryan Dykhous	Associate		07	4.75	\$425.00	\$2,018.75
06/26/2019	Mahiri Buffong	Managing Clerk		07	4.75	\$375.00	\$1,781.25
06/26/2019	Ryan Dykhous	Associate		07	4.75	\$425.00	\$2,018.75
06/27/2019	Salvatore Graziano	Partner		07	0.50	\$1,150.00	\$575.00
06/27/2019	Ryan Dykhous	Associate		07	8.50	\$425.00	\$3,612.50
06/28/2019	Salvatore Graziano	Partner		07	1.50	\$1,150.00	\$1,725.00
06/28/2019	Michelle Leung	Case Managers		07	5.25	\$350.00	\$1,837.50

06/28/2019	Ryan Dykhous	Associate		07	6.50	\$425.00	\$2,762.50
07/12/2019	Jose Echegaray	Case Managers		07	2.25	\$350.00	\$787.50
07/12/2019	Michelle Leung	Case Managers		07	0.50	\$350.00	\$175.00
07/12/2019	Salvatore Graziano	Partner		07	0.50	\$1,150.00	\$575.00
07/14/2019	Rebecca Boon	Partner		07	2.00	\$875.00	\$1,750.00
07/15/2019	Michelle Leung	Case Managers		07	2.25	\$350.00	\$787.50
07/15/2019	Salvatore Graziano	Partner		07	1.00	\$1,150.00	\$1,150.00
07/17/2019	Jose Echegaray	Case Managers		07	0.50	\$350.00	\$175.00
07/17/2019	Michelle Leung	Case Managers		07	2.25	\$350.00	\$787.50
			TOTALS FOR PROJECT #7:		66.50		\$31,212.50

Project #8: Motion for Leave to Amend. Lead Counsel prepared for and drafted a motion for leave to amend the complaint in this Action; an amended motion for leave to amend; and a reply in response to Defendants' oppositions. Lead Counsel spent a total of 633.5 hours preparing for and drafting the motion, with a lodestar of \$437,106.25. The work, the details of which are broken down chronologically below, included work reviewing the Court's order dismissing the Complaint, researching relevant Ninth Circuit law, strategizing on the legal issues implicated by the Court's motion to dismiss order, drafting and filing the Motion for Leave to Amend on July 11, 2019 and an amended version of the motion on July 23, 2019, preparing and filing related administrative motions to file certain portions of the motion under seal, reviewing Defendants' oppositions, researching and preparing a reply brief filed on August 22, 2019, researching and responding to related motions to strike and for judicial notice filed by Defendants, and preparing for and conducting oral argument on the motion.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
06/15/2019	Rebecca Boon	Partner		08	2.00	\$875.00	\$1,750.00
06/15/2019	Julia Tebor	Associate		08	0.25	\$575.00	\$143.75
06/16/2019	Jose Echegaray	Case Managers		08	0.50	\$350.00	\$175.00
06/17/2019	Julia Tebor	Associate		08	2.00	\$575.00	\$1,150.00
06/18/2019	Jose Echegaray	Case Managers		08	0.50	\$350.00	\$175.00
06/19/2019	Salvatore Graziano	Partner		08	1.50	\$1,150.00	\$1,725.00
06/19/2019	Jose Echegaray	Case Managers		08	0.50	\$350.00	\$175.00

06/20/2019	Rebecca Boon	Partner		08	4.50	\$875.00	\$3,937.50
06/20/2019	Ryan Dykhhouse	Associate		08	1.75	\$425.00	\$743.75
06/25/2019	Rebecca Boon	Partner		08	3.00	\$875.00	\$2,625.00
06/30/2019	Julia Tebor	Associate		08	3.00	\$575.00	\$1,725.00
07/01/2019	Rebecca Boon	Partner		08	2.50	\$875.00	\$2,187.50
07/01/2019	Julia Tebor	Associate		08	2.00	\$575.00	\$1,150.00
07/01/2019	Michelle Leung	Case Managers		08	0.50	\$350.00	\$175.00
07/01/2019	Ryan Dykhhouse	Associate		08	9.25	\$425.00	\$3,931.25
07/02/2019	Rebecca Boon	Partner		08	4.25	\$875.00	\$3,718.75
07/02/2019	Mahiri Buffong	Managing Clerk		08	0.50	\$375.00	\$187.50
07/02/2019	Michelle Leung	Case Managers		08	1.00	\$350.00	\$350.00
07/02/2019	Ryan Dykhhouse	Associate		08	4.25	\$425.00	\$1,806.25
07/02/2019	Ryan Dykhhouse	Associate		08	5.25	\$425.00	\$2,231.25
07/03/2019	Rebecca Boon	Partner		08	3.50	\$875.00	\$3,062.50
07/03/2019	Michelle Leung	Case Managers		08	1.00	\$350.00	\$350.00
07/03/2019	Ryan Dykhhouse	Associate		08	5.75	\$425.00	\$2,443.75
07/04/2019	Rebecca Boon	Partner		08	2.25	\$875.00	\$1,968.75
07/04/2019	Jeremy Robinson	Partner		08	8.00	\$900.00	\$7,200.00
07/04/2019	Ryan Dykhhouse	Associate		08	1.00	\$425.00	\$425.00
07/05/2019	Rebecca Boon	Partner		08	2.50	\$875.00	\$2,187.50
07/05/2019	Jeremy Robinson	Partner		08	10.00	\$900.00	\$9,000.00
07/06/2019	Rebecca Boon	Partner		08	2.50	\$875.00	\$2,187.50
07/06/2019	Jeremy Robinson	Partner		08	12.00	\$900.00	\$10,800.00
07/07/2019	Rebecca Boon	Partner		08	2.25	\$875.00	\$1,968.75
07/07/2019	Jeremy Robinson	Partner		08	8.00	\$900.00	\$7,200.00
07/07/2019	Ryan Dykhhouse	Associate		08	1.25	\$425.00	\$531.25
07/08/2019	Rebecca Boon	Partner		08	3.75	\$875.00	\$3,281.25
07/08/2019	Jeremy Robinson	Partner		08	10.00	\$900.00	\$9,000.00
07/08/2019	Julia Tebor	Associate		08	6.25	\$575.00	\$3,593.75
07/08/2019	Ryan Dykhhouse	Associate		08	1.25	\$425.00	\$531.25
07/09/2019	Jeremy Robinson	Partner		08	14.00	\$900.00	\$12,600.00
07/09/2019	Julia Tebor	Associate		08	3.00	\$575.00	\$1,725.00
07/09/2019	Mahiri Buffong	Managing Clerk		08	1.00	\$375.00	\$375.00

07/09/2019	Michelle Leung	Case Managers		08	1.00	\$350.00	\$350.00
07/09/2019	Michelle Leung	Case Managers		08	1.00	\$350.00	\$350.00
07/09/2019	Michelle Leung	Case Managers		08	2.25	\$350.00	\$787.50
07/09/2019	Ryan Dykhous	Associate		08	2.75	\$425.00	\$1,168.75
07/10/2019	Rebecca Boon	Partner		08	1.50	\$875.00	\$1,312.50
07/10/2019	Salvatore Graziano	Partner		08	1.25	\$1,150.00	\$1,437.50
07/10/2019	Jeremy Robinson	Partner		08	12.50	\$900.00	\$11,250.00
07/10/2019	Jose Echegaray	Case Managers		08	9.25	\$350.00	\$3,237.50
07/10/2019	Julia Tebor	Associate		08	4.50	\$575.00	\$2,587.50
07/10/2019	Michelle Leung	Case Managers		08	8.50	\$350.00	\$2,975.00
07/11/2019	Rebecca Boon	Partner		08	3.50	\$875.00	\$3,062.50
07/11/2019	Salvatore Graziano	Partner		08	1.50	\$1,150.00	\$1,725.00
07/11/2019	Jeremy Robinson	Partner		08	8.00	\$900.00	\$7,200.00
07/11/2019	Jose Echegaray	Case Managers		08	8.00	\$350.00	\$2,800.00
07/11/2019	Julia Tebor	Associate		08	2.50	\$575.00	\$1,437.50
07/11/2019	Michelle Leung	Case Managers		08	1.00	\$350.00	\$350.00
07/11/2019	Michelle Leung	Case Managers		08	1.75	\$350.00	\$612.50
07/11/2019	Ryan Dykhous	Associate		08	0.75	\$425.00	\$318.75
07/12/2019	Jose Echegaray	Case Managers		08	0.25	\$350.00	\$87.50
07/17/2019	Michelle Leung	Case Managers		08	0.25	\$350.00	\$87.50
07/18/2019	Jeremy Robinson	Partner		08	3.00	\$900.00	\$2,700.00
07/18/2019	Michelle Leung	Case Managers		08	0.50	\$350.00	\$175.00
07/18/2019	Ryan Dykhous	Associate		08	0.75	\$425.00	\$318.75
07/18/2019	Salvatore Graziano	Partner		08	1.00	\$1,150.00	\$1,150.00
07/19/2019	Jeremy Robinson	Partner		08	4.00	\$900.00	\$3,600.00

07/22/2019	Jeremy Robinson	Partner		08	6.00	\$900.00	\$5,400.00
07/22/2019	Jose Echegaray	Case Managers		08	12.50	\$350.00	\$4,375.00
07/22/2019	Michelle Leung	Case Managers		08	0.50	\$350.00	\$175.00
07/22/2019	Michelle Leung	Case Managers		08	0.75	\$350.00	\$262.50
07/22/2019	Michelle Leung	Case Managers		08	7.00	\$350.00	\$2,450.00
07/22/2019	Michelle Leung	Case Managers		08	2.50	\$350.00	\$875.00
07/22/2019	Salvatore Graziano	Partner		08	1.00	\$1,150.00	\$1,150.00
07/23/2019	Jose Echegaray	Case Managers		08	10.00	\$350.00	\$3,500.00
07/23/2019	Mahiri Buffong	Managing Clerk		08	7.50	\$375.00	\$2,812.50
07/23/2019	Michelle Leung	Case Managers		08	1.00	\$350.00	\$350.00
07/23/2019	Michelle Leung	Case Managers		08	6.00	\$350.00	\$2,100.00
07/23/2019	Michelle Leung	Case Managers		08	0.75	\$350.00	\$262.50
07/23/2019	Michelle Leung	Case Managers		08	2.25	\$350.00	\$787.50

07/23/2019	Michelle Leung	Case Managers		08	0.25	\$350.00	\$87.50
07/23/2019	Michelle Leung	Case Managers		08	0.25	\$350.00	\$87.50
07/23/2019	Salvatore Graziano	Partner		08	1.00	\$1,150.00	\$1,150.00
07/25/2019	Salvatore Graziano	Partner		08	1.50	\$1,150.00	\$1,725.00
07/26/2019	Jeremy Robinson	Partner		08	11.00	\$900.00	\$9,900.00
07/26/2019	Jose Echegaray	Case Managers		08	0.75	\$350.00	\$262.50
07/26/2019	Jose Echegaray	Case Managers		08	0.50	\$350.00	\$175.00
07/26/2019	Julia Tebor	Associate		08	8.00	\$575.00	\$4,600.00
07/26/2019	Mahiri Buffong	Managing Clerk		08	2.50	\$375.00	\$937.50
07/26/2019	Michelle Leung	Case Managers		08	1.75	\$350.00	\$612.50
07/26/2019	Ryan Dykhous	Associate		08	1.75	\$425.00	\$743.75
07/26/2019	Salvatore Graziano	Partner		08	1.75	\$1,150.00	\$2,012.50
07/26/2019	Rebecca Boon	Partner		08	7.00	\$875.00	\$6,125.00
07/27/2019	Jeremy Robinson	Partner		08	6.00	\$900.00	\$5,400.00
07/27/2019	Jose Echegaray	Case Managers		08	0.50	\$350.00	\$175.00
07/27/2019	Julia Tebor	Associate		08	4.00	\$575.00	\$2,300.00
07/27/2019	Michelle Leung	Case Managers		08	0.25	\$350.00	\$87.50
07/27/2019	Salvatore Graziano	Partner		08	1.00	\$1,150.00	\$1,150.00
07/27/2019	Rebecca Boon	Partner		08	5.00	\$875.00	\$4,375.00
07/28/2019	Jose Echegaray	Case Managers		08	2.50	\$350.00	\$875.00
07/28/2019	Julia Tebor	Associate		08	6.00	\$575.00	\$3,450.00
07/28/2019	Jeremy Robinson	Partner		08	7.00	\$900.00	\$6,300.00
07/28/2019	Rebecca Boon	Partner		08	5.00	\$875.00	\$4,375.00
07/29/2019	Jose Echegaray	Case Managers		08	15.25	\$350.00	\$5,337.50
07/29/2019	Julia Tebor	Associate		08	12.00	\$575.00	\$6,900.00
07/29/2019	Ryan Dykhous	Associate		08	2.25	\$425.00	\$956.25
07/29/2019	Salvatore Graziano	Partner		08	2.00	\$1,150.00	\$2,300.00
07/29/2019	Jeremy Robinson	Partner		08	3.00	\$900.00	\$2,700.00
07/29/2019	Rebecca Boon	Partner		08	4.50	\$875.00	\$3,937.50
07/30/2019	Julia Tebor	Associate		08	11.25	\$575.00	\$6,468.75

07/30/2019	Ryan Dykhous	Associate		08	3.75	\$425.00	\$1,593.75
07/30/2019	Salvatore Graziano	Partner		08	0.50	\$1,150.00	\$575.00
07/30/2019	Rebecca Boon	Partner		08	4.50	\$875.00	\$3,937.50
07/31/2019	Jose Echegaray	Case Managers		08	1.00	\$350.00	\$350.00
07/31/2019	Jose Echegaray	Case Managers		08	0.50	\$350.00	\$175.00
07/31/2019	Julia Tebor	Associate		08	4.00	\$575.00	\$2,300.00
07/31/2019	Michelle Leung	Case Managers		08	3.50	\$350.00	\$1,225.00
07/31/2019	Michelle Leung	Case Managers		08	0.25	\$350.00	\$87.50
07/31/2019	Ryan Dykhous	Associate		08	1.75	\$425.00	\$743.75
07/31/2019	Salvatore Graziano	Partner		08	1.75	\$1,150.00	\$2,012.50
08/01/2019	Jose Echegaray	Case Managers		08	0.25	\$350.00	\$87.50
08/01/2019	Jose Echegaray	Case Managers		08	0.50	\$350.00	\$175.00
08/01/2019	Jose Echegaray	Case Managers		08	2.00	\$350.00	\$700.00
08/01/2019	Michelle Leung	Case Managers		08	1.00	\$350.00	\$350.00
08/01/2019	Michelle Leung	Case Managers		08	0.25	\$350.00	\$87.50
08/01/2019	Salvatore Graziano	Partner		08	0.50	\$1,150.00	\$575.00
08/02/2019	Julia Tebor	Associate		08	1.50	\$575.00	\$862.50
08/02/2019	Salvatore Graziano	Partner		08	0.50	\$1,150.00	\$575.00
08/05/2019	Salvatore Graziano	Partner		08	0.50	\$1,150.00	\$575.00
08/06/2019	Michelle Leung	Case Managers		08	0.50	\$350.00	\$175.00
08/06/2019	Salvatore Graziano	Partner		08	0.75	\$1,150.00	\$862.50
08/07/2019	Jose Echegaray	Case Managers		08	1.50	\$350.00	\$525.00
08/07/2019	Mahiri Buffong	Managing Clerk		08	2.50	\$375.00	\$937.50
08/07/2019	Michelle Leung	Case Managers		08	2.00	\$350.00	\$700.00
08/07/2019	Salvatore Graziano	Partner		08	1.00	\$1,150.00	\$1,150.00
08/09/2019	Jose Echegaray	Case Managers		08	0.75	\$350.00	\$262.50
08/12/2019	Rebecca Boon	Partner		08	2.50	\$875.00	\$2,187.50
08/14/2019	Michelle Leung	Case Managers		08	2.50	\$350.00	\$875.00

08/15/2019	Michelle Leung	Case Managers		08	1.75	\$350.00	\$612.50
08/15/2019	Ryan Dykhous	Associate		08	1.75	\$425.00	\$743.75
08/15/2019	Salvatore Graziano	Partner		08	0.50	\$1,150.00	\$575.00
08/16/2019	Julia Tebor	Associate		08	5.75	\$575.00	\$3,306.25
08/16/2019	Michelle Leung	Case Managers		08	0.75	\$350.00	\$262.50
08/18/2019	Julia Tebor	Associate		08	5.50	\$575.00	\$3,162.50
08/18/2019	Ryan Dykhous	Associate		08	1.25	\$425.00	\$531.25
08/19/2019	Julia Tebor	Associate		08	7.50	\$575.00	\$4,312.50
08/19/2019	Ryan Dykhous	Associate		08	2.75	\$425.00	\$1,168.75
08/19/2019	Jeremy Robinson	Partner		08	7.00	\$900.00	\$6,300.00
08/19/2019	Salvatore Graziano	Partner		08	0.50	\$1,150.00	\$575.00
08/20/2019	Jose Echegaray	Case Managers		08	2.75	\$350.00	\$962.50
08/20/2019	Julia Tebor	Associate		08	5.00	\$575.00	\$2,875.00
08/20/2019	Jeremy Robinson	Partner		08	8.00	\$900.00	\$7,200.00
08/20/2019	Salvatore Graziano	Partner		08	0.50	\$1,150.00	\$575.00
08/20/2019	Salvatore Graziano	Partner		08	3.50	\$1,150.00	\$4,025.00
08/21/2019	Jose Echegaray	Case Managers		08	1.75	\$350.00	\$612.50
08/21/2019	Julia Tebor	Associate		08	5.75	\$575.00	\$3,306.25
08/21/2019	Michelle Leung	Case Managers		08	3.75	\$350.00	\$1,312.50
08/21/2019	Michelle Leung	Case Managers		08	1.00	\$350.00	\$350.00
08/21/2019	Michelle Leung	Case Managers		08	1.00	\$350.00	\$350.00
08/21/2019	Ryan Dykhous	Associate		08	1.25	\$425.00	\$531.25
08/21/2019	Jeremy Robinson	Partner		08	6.00	\$900.00	\$5,400.00
08/21/2019	Salvatore Graziano	Partner		08	0.50	\$1,150.00	\$575.00
08/21/2019	Rebecca Boon	Partner		08	2.00	\$875.00	\$1,750.00
08/22/2019	Julia Tebor	Associate		08	5.00	\$575.00	\$2,875.00
08/22/2019	Michelle Leung	Case Managers		08	1.25	\$350.00	\$437.50

08/22/2019	Michelle Leung	Case Managers		08	1.75	\$350.00	\$612.50
08/22/2019	Michelle Leung	Case Managers		08	0.50	\$350.00	\$175.00
09/03/2019	Michelle Leung	Case Managers		08	1.75	\$350.00	\$612.50
09/03/2019	Salvatore Graziano	Partner		08	2.50	\$1,150.00	\$2,875.00
09/04/2019	Michelle Leung	Case Managers		08	1.00	\$350.00	\$350.00
09/06/2019	Mahiri Buffong	Managing Clerk		08	1.25	\$375.00	\$468.75
09/09/2019	Salvatore Graziano	Partner		08	2.00	\$1,150.00	\$2,300.00
09/10/2019	Salvatore Graziano	Partner		08	0.50	\$1,150.00	\$575.00
09/13/2019	Salvatore Graziano	Partner		08	1.50	\$1,150.00	\$1,725.00
09/16/2019	Salvatore Graziano	Partner		08	6.50	\$1,150.00	\$7,475.00
09/17/2019	Salvatore Graziano	Partner		08	5.00	\$1,150.00	\$5,750.00
09/18/2019	Salvatore Graziano	Partner		08	7.00	\$1,150.00	\$8,050.00
09/19/2019	Salvatore Graziano	Partner		08	7.50	\$1,150.00	\$8,625.00
09/20/2019	Salvatore Graziano	Partner		08	7.00	\$1,150.00	\$8,050.00
09/22/2019	Jeremy Robinson	Partner		08	4.00	\$900.00	\$3,600.00
09/23/2019	Julia Tebor	Associate		08	3.00	\$575.00	\$1,725.00
09/23/2019	Rebecca Boon	Partner		08	2.50	\$875.00	\$2,187.50
09/24/2019	Julia Tebor	Associate		08	1.00	\$575.00	\$575.00
09/24/2019	Preya Rodriguez	Paralegal		08	1.50	\$325.00	\$487.50
09/24/2019	Salvatore Graziano	Partner		08	3.00	\$1,150.00	\$3,450.00
09/25/2019	Michelle Leung	Case Managers		08	2.00	\$350.00	\$700.00
09/25/2019	Jeremy Robinson	Partner		08	4.00	\$900.00	\$3,600.00
09/25/2019	Salvatore Graziano	Partner		08	2.50	\$1,150.00	\$2,875.00
09/26/2019	Amy Bitkower	Director of Investigations		08	1.00	\$575.00	\$575.00
09/26/2019	Jeremy Robinson	Partner		08	4.00	\$900.00	\$3,600.00
09/26/2019	Salvatore Graziano	Partner		08	4.00	\$1,150.00	\$4,600.00
09/26/2019	Rebecca Boon	Partner		08	1.50	\$875.00	\$1,312.50
10/02/2019	Jeremy Robinson	Partner		08	3.00	\$900.00	\$2,700.00

10/02/2019	Salvatore Graziano	Partner		08	1.00	\$1,150.00	\$1,150.00
10/04/2019	Preya Rodriguez	Paralegal		08	3.50	\$325.00	\$1,137.50
10/06/2019	Max Berger	Partner		08	2.00	\$1,300.00	\$2,600.00
10/07/2019	Jose Echegaray	Case Managers		08	0.75	\$350.00	\$262.50
10/07/2019	Jose Echegaray	Case Managers		08	0.50	\$350.00	\$175.00
10/07/2019	Preya Rodriguez	Paralegal		08	3.75	\$325.00	\$1,218.75
				TOTALS FOR PROJECT #8:			633.50

Project #9: Preparing Joint Case Management Statements and Case Management Conference. After the Amended Complaint was sustained, Lead Counsel negotiated and preparing two Joint Case Management Statements, including a litigation schedule, and participated in the Initial Case Management Conference on February 13, 2020. Lead Counsel spent a total of 63 hours with a lodestar of \$50,825.00 related to this project. The work, the details of which are broken down chronologically below, included conferring with Defendants, negotiating and preparing an initial Joint Case Management Statement pursuant to Rule 26(f) filed with the Court on November 29, 2019, negotiating and preparing a subsequent Joint Case Management Statement filed with the Court on February 6, 2020, and preparing for and participating in the Initial Case Management Conference on February 13, 2020.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/11/2019	Jose Echegaray	Case Managers		09	0.75	\$350.00	\$262.50
11/11/2019	Jose Echegaray	Case Managers		09	0.50	\$350.00	\$175.00
11/11/2019	Mahiri Buffong	Managing Clerk		09	1.50	\$375.00	\$562.50
11/11/2019	Michelle Leung	Case Managers		09	4.50	\$350.00	\$1,575.00
11/11/2019	Salvatore Graziano	Partner		09	0.50	\$1,150.00	\$575.00
11/12/2019	Michelle Leung	Case Managers		09	0.25	\$350.00	\$87.50
11/12/2019	Salvatore Graziano	Partner		09	1.00	\$1,150.00	\$1,150.00
11/15/2019	Ryan Dykhous	Associate		09	0.75	\$425.00	\$318.75
11/15/2019	Jeremy Robinson	Partner		09	1.50	\$900.00	\$1,350.00
11/15/2019	Salvatore Graziano	Partner		09	1.50	\$1,150.00	\$1,725.00
11/18/2019	Salvatore Graziano	Partner		09	1.25	\$1,150.00	\$1,437.50
11/19/2019	Salvatore Graziano	Partner		09	0.50	\$1,150.00	\$575.00
11/19/2019	Rebecca Boon	Partner		09	1.50	\$875.00	\$1,312.50
11/25/2019	Rebecca Boon	Partner		09	0.75	\$875.00	\$656.25
11/27/2019	Ryan Dykhous	Associate		09	0.25	\$425.00	\$106.25
11/27/2019	Salvatore Graziano	Partner		09	0.75	\$1,150.00	\$862.50

11/28/2019	Rebecca Boon	Partner		09	1.00	\$875.00	\$875.00
11/29/2019	Jose Echegaray	Case Managers		09	0.75	\$350.00	\$262.50
11/29/2019	Rebecca Boon	Partner		09	2.50	\$875.00	\$2,187.50
01/29/2020	Mahiri Buffong	Managing Clerk		09	0.50	\$375.00	\$187.50
01/29/2020	Salvatore Graziano	Partner		09	0.25	\$1,150.00	\$287.50
02/05/2020	Salvatore Graziano	Partner		09	0.50	\$1,150.00	\$575.00
02/11/2020	Jeremy Robinson	Partner		09	8.00	\$900.00	\$7,200.00
02/11/2020	Jose Echegaray	Case Managers		09	0.25	\$350.00	\$87.50
02/11/2020	Jose Echegaray	Case Managers		09	3.50	\$350.00	\$1,225.00
02/11/2020	Michelle Leung	Case Managers		09	0.75	\$350.00	\$262.50
02/11/2020	Salvatore Graziano	Partner		09	0.50	\$1,150.00	\$575.00
02/12/2020	Jeremy Robinson	Partner		09	9.00	\$900.00	\$8,100.00
02/12/2020	Salvatore Graziano	Partner		09	0.50	\$1,150.00	\$575.00
02/12/2020	Rebecca Boon	Partner		09	2.00	\$875.00	\$1,750.00
02/12/2020	Rebecca Boon	Partner		09	2.50	\$875.00	\$2,187.50
02/13/2020	Jeremy Robinson	Partner		09	8.00	\$900.00	\$7,200.00
02/13/2020	Ryan Dykhous	Associate		09	1.25	\$425.00	\$531.25
02/13/2020	Salvatore Graziano	Partner		09	3.00	\$1,150.00	\$3,450.00
02/15/2020	Salvatore Graziano	Partner		09	0.50	\$1,150.00	\$575.00
			TOTALS FOR PROJECT #9:		63.00		\$50,825.00

Project #10: Initial Disclosures. As set forth below, Lead Counsel spent a total of 19 hours with a lodestar of \$9,893.75 preparing and finalizing Lead Plaintiff's initial disclosures and serving them on Defendants, as well as preparing an amended version of the initial disclosures.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
10/28/2019	Jose Echegaray	Case Managers		10	2.50	\$350.00	\$875.00
11/08/2019	Mahiri Buffong	Managing Clerk		10	1.50	\$375.00	\$562.50
11/22/2019	Ryan Dykhous	Associate		10	0.75	\$425.00	\$318.75
11/22/2019	Rebecca Boon	Partner		10	2.00	\$875.00	\$1,750.00
12/03/2019	Ryan Dykhous	Associate		10	1.25	\$425.00	\$531.25
12/06/2019	Ryan Dykhous	Associate		10	2.25	\$425.00	\$956.25
12/10/2019	Rebecca Boon	Partner		10	0.50	\$875.00	\$437.50
12/13/2019	Ryan Dykhous	Associate		10	1.50	\$425.00	\$637.50
12/13/2019	Salvatore Graziano	Partner		10	0.50	\$1,150.00	\$575.00
12/14/2019	Ryan Dykhous	Associate		10	0.50	\$425.00	\$212.50
12/14/2019	Ryan Dykhous	Associate		10	0.25	\$425.00	\$106.25
12/16/2019	Michelle Leung	Case Managers		10	0.50	\$350.00	\$175.00

02/14/2020	Salvatore Graziano	Partner		10	0.25	\$1,150.00	\$287.50
02/24/2020	Ryan Dykhous	Associate		10	0.75	\$425.00	\$318.75
02/28/2020	Ryan Dykhous	Associate		10	3.00	\$425.00	\$1,275.00
02/28/2020	Rebecca Boon	Partner		10	1.00	\$875.00	\$875.00
			TOTALS FOR PROJECT #10:		1,195.75		\$833,581.25
Project #11: Lead Plaintiff's Requests for Production of Documents (directed to Defendants). As set forth below, Lead Counsel spent a total of 55.5 hours with a lodestar of \$33,231.25 drafting Lead Plaintiff's requests for production of documents and serving them on Defendants.							
Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
10/03/2019	Jose Echegaray	Case Managers		11	0.50	\$350.00	\$175.00
10/04/2019	Julia Tebor	Associate		11	5.00	\$575.00	\$2,875.00
10/08/2019	Julia Tebor	Associate		11	5.50	\$575.00	\$3,162.50
10/09/2019	Julia Tebor	Associate		11	2.00	\$575.00	\$1,150.00
10/10/2019	Julia Tebor	Associate		11	2.00	\$575.00	\$1,150.00
10/24/2019	Julia Tebor	Associate		11	1.50	\$575.00	\$862.50
10/28/2019	Julia Tebor	Associate		11	1.50	\$575.00	\$862.50
10/29/2019	Julia Tebor	Associate		11	1.00	\$575.00	\$575.00
10/30/2019	Julia Tebor	Associate		11	6.00	\$575.00	\$3,450.00
10/31/2019	Julia Tebor	Associate		11	9.00	\$575.00	\$5,175.00
11/01/2019	Julia Tebor	Associate		11	4.50	\$575.00	\$2,587.50
11/07/2019	Jose Echegaray	Case Managers		11	2.25	\$350.00	\$787.50
11/07/2019	Rebecca Boon	Partner		11	0.75	\$875.00	\$656.25
11/08/2019	Julia Tebor	Associate		11	4.50	\$575.00	\$2,587.50
12/02/2019	Jeremy Robinson	Partner		11	7.00	\$900.00	\$6,300.00
12/03/2019	Jose Echegaray	Case Managers		11	0.50	\$350.00	\$175.00
12/06/2019	Jose Echegaray	Case Managers		11	0.25	\$350.00	\$87.50
12/23/2019	Michelle Leung	Case Managers		11	0.25	\$350.00	\$87.50
01/07/2020	Jose Echegaray	Case Managers		11	0.50	\$350.00	\$175.00
01/22/2020	Jose Echegaray	Case Managers		11	0.50	\$350.00	\$175.00
11/16/2020	Michelle Leung	Case Managers		11	0.50	\$350.00	\$175.00
				TOTALS FOR PROJECT #11:		55.50	

Project #12: Review and Analysis of Defendants' Document Production. Defendants produced a total of 1.8 million pages of documents in response to Lead Plaintiff's document requests. Lead Counsel spent a total of 17,867.25 hours with a lodestar of \$7,220,562.50, in reviewing, coding, and analyzing the documents received. The work, the details of which are broken down chronologically below, included reviewing the documents received for relevance and importance, identifying "hot documents," and participating in regular meetings to review and discuss hot documents and other issues related to the document production. This project also includes many targeted reviews of the document production with respect to certain subject matters and categories of documents, and drafting of memos summarizing and memorializing information found in the documents but does not include targeted reviews of the documents conducted in connection with preparation for depositions or in connection with the opposition to the motion for summary judgment.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
01/14/2020	Johanna Pitcairn	Litigation Support		12	1.00	\$400.00	\$400.00
01/15/2020	Johanna Pitcairn	Litigation Support		12	1.00	\$400.00	\$400.00
01/15/2020	Preya Rodriguez	Paralegal		12	7.25	\$325.00	\$2,356.25
01/27/2020	Ryan Dykhous	Associate		12	1.75	\$425.00	\$743.75
01/29/2020	Ingvar Olsson	Staff Attorney		12	5.75	\$400.00	\$2,300.00
01/30/2020	Ingvar Olsson	Staff Attorney		12	7.00	\$400.00	\$2,800.00
01/31/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/05/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
02/05/2020	Ryan Dykhous	Associate		12	0.50	\$425.00	\$212.50
02/11/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
02/19/2020	Ingvar Olsson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
02/19/2020	Ryan Dykhous	Associate		12	0.50	\$425.00	\$212.50
02/20/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/20/2020	Jose Echegaray	Case Managers		12	0.50	\$350.00	\$175.00
02/24/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00

02/25/2020	Ingvar Olsson	Staff Attorney		12	7.25	\$400.00	\$2,900.00
02/26/2020	Ingvar Olsson	Staff Attorney		12	8.75	\$400.00	\$3,500.00
02/27/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/28/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/29/2020	Stephen Imundo	Senior Staff Attorneys		12	3.75	\$425.00	\$1,593.75
03/02/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/02/2020	Ryan Dykhous	Associate		12	0.50	\$425.00	\$212.50
03/02/2020	Stephen Imundo	Senior Staff Attorneys		12	5.25	\$425.00	\$2,231.25
03/03/2020	Ingvar Olsson	Staff Attorney		12	9.50	\$400.00	\$3,800.00
03/04/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/05/2020	Ingvar Olsson	Staff Attorney		12	8.25	\$400.00	\$3,300.00
03/05/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
03/06/2020	Ingvar Olsson	Staff Attorney		12	6.25	\$400.00	\$2,500.00
03/06/2020	Stephen Imundo	Senior Staff Attorneys		12	8.25	\$425.00	\$3,506.25
03/08/2020	Stephen Imundo	Senior Staff Attorneys		12	8.75	\$425.00	\$3,718.75
03/09/2020	Ingvar Olsson	Staff Attorney		12	8.25	\$400.00	\$3,300.00
03/09/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
03/09/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
03/10/2020	Ingvar Olsson	Staff Attorney		12	6.75	\$400.00	\$2,700.00
03/10/2020	Stephen Imundo	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00

03/11/2020	Ingvar Olsson	Staff Attorney		12	7.75	\$400.00	\$3,100.00
03/11/2020	Johanna Pitcairn	Litigation Support		12	1.00	\$400.00	\$400.00
03/11/2020	Ryan Dykhous	Associate		12	1.75	\$425.00	\$743.75
03/11/2020	Stephen Imundo	Senior Staff Attorneys		12	8.25	\$425.00	\$3,506.25
03/12/2020	Ingvar Olsson	Staff Attorney		12	3.50	\$400.00	\$1,400.00
03/12/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
03/12/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
03/13/2020	Igor Faynshteyn	Staff Attorney		12	11.50	\$375.00	\$4,312.50
03/13/2020	Ingvar Olsson	Staff Attorney		12	5.50	\$400.00	\$2,200.00
03/13/2020	Stephen Imundo	Senior Staff Attorneys		12	5.50	\$425.00	\$2,337.50
03/14/2020	Stephen Imundo	Senior Staff Attorneys		12	5.25	\$425.00	\$2,231.25
03/15/2020	Igor Faynshteyn	Staff Attorney		12	5.00	\$375.00	\$1,875.00
03/15/2020	Stephen Imundo	Senior Staff Attorneys		12	7.50	\$425.00	\$3,187.50
03/16/2020	Helen Fikrey	Staff Attorney		12	8.75	\$400.00	\$3,500.00
03/16/2020	Ingvar Olsson	Staff Attorney		12	2.25	\$400.00	\$900.00
03/16/2020	Stephen Imundo	Senior Staff Attorneys		12	10.25	\$425.00	\$4,356.25
03/17/2020	Helen Fikrey	Staff Attorney		12	6.75	\$400.00	\$2,700.00
03/17/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
03/17/2020	Stephen Imundo	Senior Staff Attorneys		12	9.50	\$425.00	\$4,037.50
03/17/2020	William Pham	Staff Attorney		12	8.00	\$375.00	\$3,000.00
03/18/2020	Helen Fikrey	Staff Attorney		12	8.75	\$400.00	\$3,500.00
03/18/2020	Ingvar Olsson	Staff Attorney		12	6.25	\$400.00	\$2,500.00

03/18/2020	Stephen Imundo	Senior Staff Attorneys		12	10.00	\$425.00	\$4,250.00
03/18/2020	William Pham	Staff Attorney		12	9.75	\$375.00	\$3,656.25
03/19/2020	Helen Fikrey	Staff Attorney		12	4.50	\$400.00	\$1,800.00
03/19/2020	Ingvar Olsson	Staff Attorney		12	4.00	\$400.00	\$1,600.00
03/19/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
03/19/2020	Stephen Imundo	Senior Staff Attorneys		12	10.75	\$425.00	\$4,568.75
03/20/2020	Helen Fikrey	Staff Attorney		12	9.50	\$400.00	\$3,800.00
03/20/2020	Igor Faynshteyn	Staff Attorney		12	11.50	\$375.00	\$4,312.50
03/20/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/20/2020	Stephen Imundo	Senior Staff Attorneys		12	11.00	\$425.00	\$4,675.00
03/20/2020	William Pham	Staff Attorney		12	8.00	\$375.00	\$3,000.00
03/21/2020	Stephen Imundo	Senior Staff Attorneys		12	7.00	\$425.00	\$2,975.00
03/22/2020	Helen Fikrey	Staff Attorney		12	5.00	\$400.00	\$2,000.00
03/22/2020	Igor Faynshteyn	Staff Attorney		12	5.00	\$375.00	\$1,875.00
03/22/2020	Stephen Imundo	Senior Staff Attorneys		12	6.50	\$425.00	\$2,762.50
03/22/2020	William Pham	Staff Attorney		12	8.25	\$375.00	\$3,093.75
03/23/2020	Helen Fikrey	Staff Attorney		12	8.75	\$400.00	\$3,500.00
03/23/2020	Igor Faynshteyn	Staff Attorney		12	10.50	\$375.00	\$3,937.50
03/23/2020	Ingvar Olsson	Staff Attorney		12	6.50	\$400.00	\$2,600.00
03/23/2020	William Pham	Staff Attorney		12	7.50	\$375.00	\$2,812.50
03/24/2020	Helen Fikrey	Staff Attorney		12	6.00	\$400.00	\$2,400.00
03/24/2020	Igor Faynshteyn	Staff Attorney		12	10.00	\$375.00	\$3,750.00

03/24/2020	Ingvar Olsson	Staff Attorney		12	4.50	\$400.00	\$1,800.00
03/24/2020	Johanna Pitcairn	Litigation Support		12	0.50	\$400.00	\$200.00
03/24/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
03/25/2020	Helen Fikrey	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/25/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
03/25/2020	Ingvar Olsson	Staff Attorney		12	7.75	\$400.00	\$3,100.00
03/25/2020	Stephen Imundo	Senior Staff Attorneys		12	8.75	\$425.00	\$3,718.75
03/25/2020	William Pham	Staff Attorney		12	5.50	\$375.00	\$2,062.50
03/26/2020	Jeremy Robinson	Partner		12	8.50	\$900.00	\$7,650.00
03/26/2020	Helen Fikrey	Staff Attorney		12	8.50	\$400.00	\$3,400.00
03/26/2020	Igor Faynshteyn	Staff Attorney		12	5.50	\$375.00	\$2,062.50
03/26/2020	Ingvar Olsson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
03/26/2020	Stephen Imundo	Senior Staff Attorneys		12	10.75	\$425.00	\$4,568.75
03/27/2020	Jeremy Robinson	Partner		12	7.00	\$900.00	\$6,300.00
03/27/2020	Helen Fikrey	Staff Attorney		12	8.25	\$400.00	\$3,300.00
03/27/2020	Igor Faynshteyn	Staff Attorney		12	6.50	\$375.00	\$2,437.50
03/27/2020	Ingvar Olsson	Staff Attorney		12	8.75	\$400.00	\$3,500.00
03/27/2020	Stephen Imundo	Senior Staff Attorneys		12	2.75	\$425.00	\$1,168.75
03/27/2020	William Pham	Staff Attorney		12	5.00	\$375.00	\$1,875.00
03/29/2020	William Pham	Staff Attorney		12	8.25	\$375.00	\$3,093.75

03/30/2020	Helen Fikrey	Staff Attorney		12	7.00	\$400.00	\$2,800.00
03/30/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
03/30/2020	Ingvar Olsson	Staff Attorney		12	4.25	\$400.00	\$1,700.00
03/30/2020	Johanna Pitcairn	Litigation Support		12	0.75	\$400.00	\$300.00
03/30/2020	Stephen Imundo	Senior Staff Attorneys		12	9.75	\$425.00	\$4,143.75
03/31/2020	Helen Fikrey	Staff Attorney		12	9.00	\$400.00	\$3,600.00
03/31/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
03/31/2020	Igor Faynshteyn	Staff Attorney		12	2.00	\$375.00	\$750.00
03/31/2020	Ingvar Olsson	Staff Attorney		12	4.75	\$400.00	\$1,900.00
03/31/2020	Johanna Pitcairn	Litigation Support		12	2.50	\$400.00	\$1,000.00
03/31/2020	Ryan Dykhous	Associate		12	1.25	\$425.00	\$531.25
03/31/2020	Stephen Imundo	Senior Staff Attorneys		12	9.50	\$425.00	\$4,037.50
04/01/2020	Helen Fikrey	Staff Attorney		12	9.00	\$400.00	\$3,600.00
04/01/2020	Igor Faynshteyn	Staff Attorney		12	4.00	\$375.00	\$1,500.00
04/01/2020	Ingvar Olsson	Staff Attorney		12	8.75	\$400.00	\$3,500.00
04/01/2020	Stephen Imundo	Senior Staff Attorneys		12	5.50	\$425.00	\$2,337.50
04/01/2020	Stephen Imundo	Senior Staff Attorneys		12	2.50	\$425.00	\$1,062.50
04/01/2020	Rebecca Boon	Partner		12	1.00	\$875.00	\$875.00
04/02/2020	Helen Fikrey	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/02/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/02/2020	Ingvar Olsson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
04/02/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
04/03/2020	Helen Fikrey	Staff Attorney		12	6.50	\$400.00	\$2,600.00
04/03/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
04/03/2020	Ingvar Olsson	Staff Attorney		12	0.50	\$400.00	\$200.00

04/03/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
04/03/2020	Stephen Imundo	Senior Staff Attorneys		12	4.50	\$425.00	\$1,912.50
04/03/2020	William Pham	Staff Attorney		12	3.25	\$375.00	\$1,218.75
04/05/2020	Igor Faynshteyn	Staff Attorney		12	2.00	\$375.00	\$750.00
04/06/2020	Helen Fikrey	Staff Attorney		12	9.75	\$400.00	\$3,900.00
04/06/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/06/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/06/2020	Stephen Imundo	Senior Staff Attorneys		12	13.00	\$425.00	\$5,525.00
04/06/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
04/07/2020	Helen Fikrey	Staff Attorney		12	9.00	\$400.00	\$3,600.00
04/07/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/07/2020	Ingvar Olsson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/07/2020	Stephen Imundo	Senior Staff Attorneys		12	7.50	\$425.00	\$3,187.50
04/07/2020	Stephen Imundo	Senior Staff Attorneys		12	3.75	\$425.00	\$1,593.75
04/07/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
04/08/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/08/2020	Helen Fikrey	Staff Attorney		12	2.50	\$400.00	\$1,000.00
04/08/2020	Helen Fikrey	Staff Attorney		12	4.75	\$400.00	\$1,900.00
04/08/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/08/2020	Ingvar Olsson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
04/08/2020	Jose Echegaray	Case Managers		12	0.75	\$350.00	\$262.50
04/08/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
04/08/2020	Ryan Dykhous	Associate		12	1.25	\$425.00	\$531.25
04/08/2020	Ryan Dykhous	Associate		12	1.50	\$425.00	\$637.50

04/08/2020	Stephen Imundo	Senior Staff Attorneys		12	10.75	\$425.00	\$4,568.75
04/08/2020	William Pham	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/08/2020	Jeremy Robinson	Partner		12	9.00	\$900.00	\$8,100.00
04/09/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/09/2020	Erick Ladson	Staff Attorney		12	7.00	\$400.00	\$2,800.00
04/09/2020	Helen Fikrey	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/09/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
04/09/2020	Ingvar Olsson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/09/2020	Stephen Imundo	Senior Staff Attorneys		12	3.50	\$425.00	\$1,487.50
04/09/2020	William Pham	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/10/2020	Addison F. Golladay	Staff Attorney		12	4.00	\$400.00	\$1,600.00
04/10/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/10/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/10/2020	Helen Fikrey	Staff Attorney		12	6.50	\$400.00	\$2,600.00
04/10/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/10/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/10/2020	Stephen Imundo	Senior Staff Attorneys		12	1.50	\$425.00	\$637.50
04/10/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
04/12/2020	Igor Faynshteyn	Staff Attorney		12	1.00	\$375.00	\$375.00
04/13/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/13/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/13/2020	Erick Ladson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/13/2020	Esinam Quarco	Staff Attorney		12	4.00	\$400.00	\$1,600.00
04/13/2020	Helen Fikrey	Staff Attorney		12	8.25	\$400.00	\$3,300.00
04/13/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00

04/13/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/13/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/13/2020	Stephen Imundo	Senior Staff Attorneys		12	9.25	\$425.00	\$3,931.25
04/14/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/14/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/14/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
04/14/2020	Esinam Quarco	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/14/2020	Helen Fikrey	Staff Attorney		12	4.75	\$400.00	\$1,900.00
04/14/2020	Igor Faynshteyn	Staff Attorney		12	7.50	\$375.00	\$2,812.50
04/14/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/14/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/14/2020	Stephen Imundo	Senior Staff Attorneys		12	9.50	\$425.00	\$4,037.50
04/14/2020	Stephen Imundo	Senior Staff Attorneys		12	2.25	\$425.00	\$956.25
04/14/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
04/15/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/15/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/15/2020	Erick Ladson	Staff Attorney		12	7.00	\$400.00	\$2,800.00
04/15/2020	Esinam Quarco	Staff Attorney		12	7.00	\$400.00	\$2,800.00
04/15/2020	Helen Fikrey	Staff Attorney		12	5.00	\$400.00	\$2,000.00
04/15/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/15/2020	Ingvar Olsson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/15/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/15/2020	Michelle Leung	Case Managers		12	0.75	\$350.00	\$262.50
04/15/2020	Preya Rodriguez	Paralegal		12	0.50	\$325.00	\$162.50
04/15/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00

04/15/2020	Stephen Imundo	Senior Staff Attorneys		12	8.50	\$425.00	\$3,612.50
04/15/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
04/15/2020	Jeremy Robinson	Partner		12	7.50	\$900.00	\$6,750.00
04/15/2020	Rebecca Boon	Partner		12	1.00	\$875.00	\$875.00
04/16/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/16/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/16/2020	Erick Ladson	Staff Attorney		12	9.50	\$400.00	\$3,800.00
04/16/2020	Esinam Quarco	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/16/2020	Helen Fikrey	Staff Attorney		12	8.75	\$400.00	\$3,500.00
04/16/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
04/16/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/16/2020	Ryan Dykhhouse	Associate		12	1.25	\$425.00	\$531.25
04/16/2020	Stephen Imundo	Senior Staff Attorneys		12	7.25	\$425.00	\$3,081.25
04/16/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
04/17/2020	Addison F. Golladay	Staff Attorney		12	6.00	\$400.00	\$2,400.00
04/17/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/17/2020	Erick Ladson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/17/2020	Esinam Quarco	Staff Attorney		12	6.50	\$400.00	\$2,600.00
04/17/2020	Helen Fikrey	Staff Attorney		12	8.25	\$400.00	\$3,300.00
04/17/2020	Igor Faynshteyn	Staff Attorney		12	7.50	\$375.00	\$2,812.50
04/17/2020	Ingvar Olsson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/17/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/17/2020	Stephen Imundo	Senior Staff Attorneys		12	3.25	\$425.00	\$1,381.25

04/17/2020	William Pham	Staff Attorney		12	3.00	\$375.00	\$1,125.00
04/18/2020	Esinam Quarco	Staff Attorney		12	7.00	\$400.00	\$2,800.00
04/19/2020	Addison F. Golladay	Staff Attorney		12	3.00	\$400.00	\$1,200.00
04/19/2020	Igor Faynshteyn	Staff Attorney		12	2.00	\$375.00	\$750.00
04/20/2020	Addison F. Golladay	Staff Attorney		12	5.00	\$400.00	\$2,000.00
04/20/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/20/2020	Erick Ladson	Staff Attorney		12	7.00	\$400.00	\$2,800.00
04/20/2020	Esinam Quarco	Staff Attorney		12	7.75	\$400.00	\$3,100.00
04/20/2020	Helen Fikrey	Staff Attorney		12	8.50	\$400.00	\$3,400.00
04/20/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/20/2020	Igor Faynshteyn	Staff Attorney		12	2.50	\$375.00	\$937.50
04/20/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/20/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/20/2020	Ryan Dykhous	Associate		12	1.25	\$425.00	\$531.25
04/20/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
04/20/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
04/21/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/21/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/21/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/21/2020	Esinam Quarco	Staff Attorney		12	5.50	\$400.00	\$2,200.00
04/21/2020	Helen Fikrey	Staff Attorney		12	2.00	\$400.00	\$800.00
04/21/2020	Helen Fikrey	Staff Attorney		12	7.00	\$400.00	\$2,800.00
04/21/2020	Igor Faynshteyn	Staff Attorney		12	6.50	\$375.00	\$2,437.50
04/21/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00

04/21/2020	Johanna Pitcairn	Litigation Support		12	1.00	\$400.00	\$400.00
04/21/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/21/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
04/21/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
04/22/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/22/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/22/2020	Erick Ladson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/22/2020	Esinam Quarco	Staff Attorney		12	8.25	\$400.00	\$3,300.00
04/22/2020	Helen Fikrey	Staff Attorney		12	3.75	\$400.00	\$1,500.00
04/22/2020	Helen Fikrey	Staff Attorney		12	3.50	\$400.00	\$1,400.00
04/22/2020	Igor Faynshteyn	Staff Attorney		12	6.00	\$375.00	\$2,250.00
04/22/2020	Igor Faynshteyn	Staff Attorney		12	2.00	\$375.00	\$750.00
04/22/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/22/2020	Jose Echegaray	Case Managers		12	1.00	\$350.00	\$350.00
04/22/2020	Jose Echegaray	Case Managers		12	0.25	\$350.00	\$87.50
04/22/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/22/2020	Preya Rodriguez	Paralegal		12	0.75	\$325.00	\$243.75
04/22/2020	Ryan Dykhous	Associate		12	1.50	\$425.00	\$637.50
04/22/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
04/22/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
04/22/2020	Rebecca Boon	Partner		12	1.00	\$875.00	\$875.00
04/23/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/23/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/23/2020	Erick Ladson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
04/23/2020	Esinam Quarco	Staff Attorney		12	6.00	\$400.00	\$2,400.00
04/23/2020	Helen Fikrey	Staff Attorney		12	7.25	\$400.00	\$2,900.00
04/23/2020	Igor Faynshteyn	Staff Attorney		12	3.00	\$375.00	\$1,125.00
04/23/2020	Igor Faynshteyn	Staff Attorney		12	3.00	\$375.00	\$1,125.00

04/23/2020	Ingvar Olsson	Staff Attorney		12	3.00	\$400.00	\$1,200.00
04/23/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/23/2020	Stephen Imundo	Senior Staff Attorneys		12	6.50	\$425.00	\$2,762.50
04/23/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
04/23/2020	Rebecca Boon	Partner		12	0.50	\$875.00	\$437.50
04/24/2020	Addison F. Golladay	Staff Attorney		12	6.00	\$400.00	\$2,400.00
04/24/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/24/2020	Erick Ladson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/24/2020	Esinam Quarco	Staff Attorney		12	6.50	\$400.00	\$2,600.00
04/24/2020	Helen Fikrey	Staff Attorney		12	7.00	\$400.00	\$2,800.00
04/24/2020	Helen Fikrey	Staff Attorney		12	1.00	\$400.00	\$400.00
04/24/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/24/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/24/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
04/24/2020	Ryan Dykhous	Associate		12	0.25	\$425.00	\$106.25
04/24/2020	Stephen Imundo	Senior Staff Attorneys		12	8.25	\$425.00	\$3,506.25
04/24/2020	William Pham	Staff Attorney		12	3.00	\$375.00	\$1,125.00
04/25/2020	Stephen Imundo	Senior Staff Attorneys		12	2.00	\$425.00	\$850.00
04/25/2020	Rebecca Boon	Partner		12	1.00	\$875.00	\$875.00
04/26/2020	Addison F. Golladay	Staff Attorney		12	4.00	\$400.00	\$1,600.00
04/26/2020	Esinam Quarco	Staff Attorney		12	6.00	\$400.00	\$2,400.00
04/27/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/27/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/27/2020	Erick Ladson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/27/2020	Esinam Quarco	Staff Attorney		12	6.00	\$400.00	\$2,400.00
04/27/2020	Helen Fikrey	Staff Attorney		12	6.75	\$400.00	\$2,700.00
04/27/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00

04/27/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/27/2020	Stephen Imundo	Senior Staff Attorneys		12	8.75	\$425.00	\$3,718.75
04/27/2020	William Pham	Staff Attorney		12	9.75	\$375.00	\$3,656.25
04/28/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/28/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/28/2020	Erick Ladson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/28/2020	Esinam Quarco	Staff Attorney		12	6.50	\$400.00	\$2,600.00
04/28/2020	Helen Fikrey	Staff Attorney		12	6.75	\$400.00	\$2,700.00
04/28/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/28/2020	Ingvar Olsson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/28/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/28/2020	Preya Rodriguez	Paralegal		12	1.00	\$325.00	\$325.00
04/28/2020	Stephen Imundo	Senior Staff Attorneys		12	2.75	\$425.00	\$1,168.75
04/28/2020	William Pham	Staff Attorney		12	8.75	\$375.00	\$3,281.25
04/29/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/29/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/29/2020	Erick Ladson	Staff Attorney		12	7.25	\$400.00	\$2,900.00
04/29/2020	Esinam Quarco	Staff Attorney		12	10.25	\$400.00	\$4,100.00
04/29/2020	Helen Fikrey	Staff Attorney		12	8.50	\$400.00	\$3,400.00
04/29/2020	Igor Faynshteyn	Staff Attorney		12	5.00	\$375.00	\$1,875.00
04/29/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
04/29/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/29/2020	Preya Rodriguez	Paralegal		12	1.00	\$325.00	\$325.00
04/29/2020	Stephen Imundo	Senior Staff Attorneys		12	8.75	\$425.00	\$3,718.75
04/29/2020	William Pham	Staff Attorney		12	8.50	\$375.00	\$3,187.50
04/29/2020	Jeremy Robinson	Partner		12	2.50	\$900.00	\$2,250.00

04/29/2020	Rebecca Boon	Partner		12	1.50	\$875.00	\$1,312.50
04/30/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
04/30/2020	Erick Ladson	Staff Attorney		12	8.75	\$400.00	\$3,500.00
04/30/2020	Esinam Quarco	Staff Attorney		12	9.50	\$400.00	\$3,800.00
04/30/2020	Helen Fikrey	Staff Attorney		12	7.00	\$400.00	\$2,800.00
04/30/2020	Ingvar Olsson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
04/30/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
04/30/2020	Stephen Imundo	Senior Staff Attorneys		12	7.50	\$425.00	\$3,187.50
04/30/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/01/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
05/01/2020	Erick Ladson	Staff Attorney		12	9.00	\$400.00	\$3,600.00
05/01/2020	Esinam Quarco	Staff Attorney		12	7.75	\$400.00	\$3,100.00
05/01/2020	Helen Fikrey	Staff Attorney		12	5.00	\$400.00	\$2,000.00
05/01/2020	Ingvar Olsson	Staff Attorney		12	5.25	\$400.00	\$2,100.00
05/01/2020	Ingvar Olsson	Staff Attorney		12	1.25	\$400.00	\$500.00
05/01/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/01/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
05/02/2020	Helen Fikrey	Staff Attorney		12	6.00	\$400.00	\$2,400.00
05/04/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/04/2020	Erick Ladson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
05/04/2020	Esinam Quarco	Staff Attorney		12	6.75	\$400.00	\$2,700.00
05/04/2020	Helen Fikrey	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/04/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/04/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/04/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/05/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/05/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00

05/05/2020	Esinam Quarco	Staff Attorney		12	10.75	\$400.00	\$4,300.00
05/05/2020	Helen Fikrey	Staff Attorney		12	7.00	\$400.00	\$2,800.00
05/05/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/05/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/05/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
05/05/2020	William Pham	Staff Attorney		12	9.50	\$375.00	\$3,562.50
05/06/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/06/2020	Brian Chau	Senior Staff Attorneys		12	1.00	\$425.00	\$425.00
05/06/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/06/2020	Esinam Quarco	Staff Attorney		12	8.25	\$400.00	\$3,300.00
05/06/2020	Helen Fikrey	Staff Attorney		12	9.00	\$400.00	\$3,600.00
05/06/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/06/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/06/2020	Justin Ratliff	Staff Attorney		12	0.50	\$350.00	\$175.00
05/06/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/06/2020	Preya Rodriguez	Paralegal		12	0.75	\$325.00	\$243.75
05/06/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
05/06/2020	Stephen Imundo	Senior Staff Attorneys		12	7.25	\$425.00	\$3,081.25
05/06/2020	William Pham	Staff Attorney		12	9.50	\$375.00	\$3,562.50
05/06/2020	Jeremy Robinson	Partner		12	4.50	\$900.00	\$4,050.00
05/06/2020	Rebecca Boon	Partner		12	1.00	\$875.00	\$875.00
05/07/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/07/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
05/07/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00

05/07/2020	Erick Ladson	Staff Attorney		12	9.50	\$400.00	\$3,800.00
05/07/2020	Esinam Quarco	Staff Attorney		12	7.50	\$400.00	\$3,000.00
05/07/2020	Helen Fikrey	Staff Attorney		12	6.50	\$400.00	\$2,600.00
05/07/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
05/07/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/07/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/08/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/08/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
05/08/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/08/2020	Erick Ladson	Staff Attorney		12	7.00	\$400.00	\$2,800.00
05/08/2020	Esinam Quarco	Staff Attorney		12	6.75	\$400.00	\$2,700.00
05/08/2020	Helen Fikrey	Staff Attorney		12	7.00	\$400.00	\$2,800.00
05/08/2020	Ibrahim Hamed	Staff Attorney		12	6.00	\$400.00	\$2,400.00
05/08/2020	Igor Faynshteyn	Staff Attorney		12	8.50	\$375.00	\$3,187.50
05/08/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/08/2020	Jed Koslow	Staff Attorney		12	5.25	\$400.00	\$2,100.00
05/08/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/08/2020	William Pham	Staff Attorney		12	3.00	\$375.00	\$1,125.00
05/09/2020	Addison F. Golladay	Staff Attorney		12	4.00	\$400.00	\$1,600.00
05/09/2020	Helen Fikrey	Staff Attorney		12	0.75	\$400.00	\$300.00
05/10/2020	Addison F. Golladay	Staff Attorney		12	4.00	\$400.00	\$1,600.00
05/11/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/11/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
05/11/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/11/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00

05/11/2020	Esinam Quarco	Staff Attorney		12	10.50	\$400.00	\$4,200.00
05/11/2020	Helen Fikrey	Staff Attorney		12	2.50	\$400.00	\$1,000.00
05/11/2020	Helen Fikrey	Staff Attorney		12	5.25	\$400.00	\$2,100.00
05/11/2020	Ibrahim Hamed	Staff Attorney		12	9.50	\$400.00	\$3,800.00
05/11/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/11/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/11/2020	Jed Koslow	Staff Attorney		12	11.00	\$400.00	\$4,400.00
05/11/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/11/2020	Monique Hardial	Staff Attorney		12	8.50	\$375.00	\$3,187.50
05/11/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/12/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/12/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
05/12/2020	Colette Foster	Staff Attorney		12	7.00	\$400.00	\$2,800.00
05/12/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/12/2020	Esinam Quarco	Staff Attorney		12	9.25	\$400.00	\$3,700.00
05/12/2020	Helen Fikrey	Staff Attorney		12	1.00	\$400.00	\$400.00
05/12/2020	Helen Fikrey	Staff Attorney		12	12.00	\$400.00	\$4,800.00
05/12/2020	Ibrahim Hamed	Staff Attorney		12	9.25	\$400.00	\$3,700.00
05/12/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/12/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/12/2020	Jed Koslow	Staff Attorney		12	10.75	\$400.00	\$4,300.00
05/12/2020	Justin Ratliff	Staff Attorney		12	4.00	\$350.00	\$1,400.00
05/12/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/12/2020	Monique Hardial	Staff Attorney		12	7.50	\$375.00	\$2,812.50
05/12/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/13/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/13/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
05/13/2020	Colette Foster	Staff Attorney		12	9.25	\$400.00	\$3,700.00
05/13/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00

05/13/2020	Esinam Quarco	Staff Attorney		12	7.75	\$400.00	\$3,100.00
05/13/2020	Ibrahim Hamed	Staff Attorney		12	8.50	\$400.00	\$3,400.00
05/13/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
05/13/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/13/2020	Jed Koslow	Staff Attorney		12	6.25	\$400.00	\$2,500.00
05/13/2020	Justin Ratliff	Staff Attorney		12	3.50	\$350.00	\$1,225.00
05/13/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/13/2020	Monique Hardial	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/13/2020	William Pham	Staff Attorney		12	8.50	\$375.00	\$3,187.50
05/13/2020	Jeremy Robinson	Partner		12	2.50	\$900.00	\$2,250.00
05/14/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/14/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
05/14/2020	Colette Foster	Staff Attorney		12	8.75	\$400.00	\$3,500.00
05/14/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/14/2020	Esinam Quarco	Staff Attorney		12	8.50	\$400.00	\$3,400.00
05/14/2020	Helen Fikrey	Staff Attorney		12	6.50	\$400.00	\$2,600.00
05/14/2020	Ibrahim Hamed	Staff Attorney		12	7.00	\$400.00	\$2,800.00
05/14/2020	Igor Faynshteyn	Staff Attorney		12	8.50	\$375.00	\$3,187.50
05/14/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/14/2020	Jed Koslow	Staff Attorney		12	5.75	\$400.00	\$2,300.00
05/14/2020	Justin Ratliff	Staff Attorney		12	5.00	\$350.00	\$1,750.00
05/14/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/14/2020	Monique Hardial	Staff Attorney		12	7.50	\$375.00	\$2,812.50
05/14/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
05/14/2020	Stephen Imundo	Senior Staff Attorneys		12	6.50	\$425.00	\$2,762.50

05/14/2020	William Pham	Staff Attorney		12	8.50	\$375.00	\$3,187.50
05/14/2020	Jeremy Robinson	Partner		12	5.00	\$900.00	\$4,500.00
05/15/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/15/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
05/15/2020	Colette Foster	Staff Attorney		12	5.00	\$400.00	\$2,000.00
05/15/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/15/2020	Esinam Quarco	Staff Attorney		12	4.00	\$400.00	\$1,600.00
05/15/2020	Helen Fikrey	Staff Attorney		12	6.25	\$400.00	\$2,500.00
05/15/2020	Ibrahim Hamed	Staff Attorney		12	5.75	\$400.00	\$2,300.00
05/15/2020	Igor Faynshteyn	Staff Attorney		12	8.50	\$375.00	\$3,187.50
05/15/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/15/2020	Jed Koslow	Staff Attorney		12	6.25	\$400.00	\$2,500.00
05/15/2020	Justin Ratliff	Staff Attorney		12	5.75	\$350.00	\$2,012.50
05/15/2020	Justin Ratliff	Staff Attorney		12	0.25	\$350.00	\$87.50
05/15/2020	Monique Hardial	Staff Attorney		12	7.50	\$375.00	\$2,812.50
05/15/2020	Ryan Dykhous	Associate		12	1.50	\$425.00	\$637.50
05/15/2020	Stephen Imundo	Senior Staff Attorneys		12	5.50	\$425.00	\$2,337.50
05/15/2020	William Pham	Staff Attorney		12	5.00	\$375.00	\$1,875.00
05/15/2020	Rebecca Boon	Partner		12	3.00	\$875.00	\$2,625.00
05/16/2020	Colette Foster	Staff Attorney		12	2.00	\$400.00	\$800.00
05/16/2020	Justin Ratliff	Staff Attorney		12	12.25	\$350.00	\$4,287.50
05/17/2020	Justin Ratliff	Staff Attorney		12	7.75	\$350.00	\$2,712.50
05/17/2020	Rebecca Boon	Partner		12	2.00	\$875.00	\$1,750.00
05/18/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
05/18/2020	Colette Foster	Staff Attorney		12	6.00	\$400.00	\$2,400.00

05/18/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/18/2020	Helen Fikrey	Staff Attorney		12	4.50	\$400.00	\$1,800.00
05/18/2020	Ibrahim Hamed	Staff Attorney		12	9.00	\$400.00	\$3,600.00
05/18/2020	Igor Faynshteyn	Staff Attorney		12	7.50	\$375.00	\$2,812.50
05/18/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/18/2020	Jed Koslow	Staff Attorney		12	3.25	\$400.00	\$1,300.00
05/18/2020	Jed Koslow	Staff Attorney		12	6.50	\$400.00	\$2,600.00
05/18/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/18/2020	Monique Hardial	Staff Attorney		12	8.50	\$375.00	\$3,187.50
05/18/2020	Ryan Dykhous	Associate		12	1.50	\$425.00	\$637.50
05/18/2020	Ryan Dykhous	Associate		12	0.50	\$425.00	\$212.50
05/18/2020	Stephen Imundo	Senior Staff Attorneys		12	10.00	\$425.00	\$4,250.00
05/18/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/18/2020	Rebecca Boon	Partner		12	2.50	\$875.00	\$2,187.50
05/19/2020	Addison F. Golladay	Staff Attorney		12	9.00	\$400.00	\$3,600.00
05/19/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
05/19/2020	Colette Foster	Staff Attorney		12	6.50	\$400.00	\$2,600.00
05/19/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/19/2020	Esinam Quarco	Staff Attorney		12	3.50	\$400.00	\$1,400.00
05/19/2020	Helen Fikrey	Staff Attorney		12	6.50	\$400.00	\$2,600.00
05/19/2020	Ibrahim Hamed	Staff Attorney		12	8.75	\$400.00	\$3,500.00
05/19/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/19/2020	Ingvar Olsson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
05/19/2020	Jed Koslow	Staff Attorney		12	10.00	\$400.00	\$4,000.00
05/19/2020	Justin Ratliff	Staff Attorney		12	3.25	\$350.00	\$1,137.50
05/19/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/19/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/19/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00

05/19/2020	Stephen Imundo	Senior Staff Attorneys		12	8.50	\$425.00	\$3,612.50
05/19/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/20/2020	Addison F. Golladay	Staff Attorney		12	8.50	\$400.00	\$3,400.00
05/20/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
05/20/2020	Colette Foster	Staff Attorney		12	9.50	\$400.00	\$3,800.00
05/20/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/20/2020	Esinam Quarco	Staff Attorney		12	10.50	\$400.00	\$4,200.00
05/20/2020	Helen Fikrey	Staff Attorney		12	4.25	\$400.00	\$1,700.00
05/20/2020	Ibrahim Hamed	Staff Attorney		12	2.50	\$400.00	\$1,000.00
05/20/2020	Igor Faynshteyn	Staff Attorney		12	7.50	\$375.00	\$2,812.50
05/20/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/20/2020	Jed Koslow	Staff Attorney		12	7.50	\$400.00	\$3,000.00
05/20/2020	Johanna Pitcairn	Litigation Support		12	0.75	\$400.00	\$300.00
05/20/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/20/2020	Monique Hardial	Staff Attorney		12	7.00	\$375.00	\$2,625.00
05/20/2020	Stephen Imundo	Senior Staff Attorneys		12	8.75	\$425.00	\$3,718.75
05/20/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/21/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/21/2020	Brian Chau	Senior Staff Attorneys		12	7.50	\$425.00	\$3,187.50
05/21/2020	Colette Foster	Staff Attorney		12	4.00	\$400.00	\$1,600.00
05/21/2020	Erick Ladson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
05/21/2020	Esinam Quarco	Staff Attorney		12	7.25	\$400.00	\$2,900.00
05/21/2020	Helen Fikrey	Staff Attorney		12	6.50	\$400.00	\$2,600.00
05/21/2020	Ibrahim Hamed	Staff Attorney		12	9.25	\$400.00	\$3,700.00
05/21/2020	Igor Faynshteyn	Staff Attorney		12	7.50	\$375.00	\$2,812.50
05/21/2020	Ingvar Olsson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
05/21/2020	Jed Koslow	Staff Attorney		12	6.75	\$400.00	\$2,700.00
05/21/2020	Lauren Cormier	Staff Attorney		12	7.50	\$375.00	\$2,812.50
05/21/2020	Monique Hardial	Staff Attorney		12	7.00	\$375.00	\$2,625.00
05/21/2020	Stephen Imundo	Senior Staff Attorneys		12	1.25	\$425.00	\$531.25

05/21/2020	Stephen Imundo	Senior Staff Attorneys		12	6.50	\$425.00	\$2,762.50
05/21/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/22/2020	Addison F. Golladay	Staff Attorney		12	3.50	\$400.00	\$1,400.00
05/22/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
05/22/2020	Colette Foster	Staff Attorney		12	10.50	\$400.00	\$4,200.00
05/22/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/22/2020	Esinam Quarco	Staff Attorney		12	10.00	\$400.00	\$4,000.00
05/22/2020	Helen Fikrey	Staff Attorney		12	8.50	\$400.00	\$3,400.00
05/22/2020	Helen Fikrey	Staff Attorney		12	1.75	\$400.00	\$700.00
05/22/2020	Ibrahim Hamed	Staff Attorney		12	10.00	\$400.00	\$4,000.00
05/22/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/22/2020	Ingvar Olsson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
05/22/2020	Jed Koslow	Staff Attorney		12	5.50	\$400.00	\$2,200.00
05/22/2020	Jose Echegaray	Case Managers		12	0.50	\$350.00	\$175.00
05/22/2020	Jose Echegaray	Case Managers		12	0.25	\$350.00	\$87.50
05/22/2020	Justin Ratliff	Staff Attorney		12	6.00	\$350.00	\$2,100.00
05/22/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/22/2020	Monique Hardial	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/22/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
05/22/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
05/22/2020	Stephen Imundo	Senior Staff Attorneys		12	4.50	\$425.00	\$1,912.50
05/22/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
05/22/2020	Rebecca Boon	Partner		12	1.00	\$875.00	\$875.00
05/23/2020	Colette Foster	Staff Attorney		12	3.00	\$400.00	\$1,200.00
05/23/2020	Esinam Quarco	Staff Attorney		12	8.25	\$400.00	\$3,300.00
05/23/2020	Helen Fikrey	Staff Attorney		12	4.50	\$400.00	\$1,800.00

05/24/2020	Helen Fikrey	Staff Attorney		12	3.50	\$400.00	\$1,400.00
05/26/2020	Addison F. Golladay	Staff Attorney		12	9.00	\$400.00	\$3,600.00
05/26/2020	Brian Chau	Senior Staff Attorneys		12	10.00	\$425.00	\$4,250.00
05/26/2020	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
05/26/2020	Erick Ladson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
05/26/2020	Esinam Quarco	Staff Attorney		12	10.00	\$400.00	\$4,000.00
05/26/2020	Helen Fikrey	Staff Attorney		12	8.75	\$400.00	\$3,500.00
05/26/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
05/26/2020	Ingvar Olsson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
05/26/2020	Jed Koslow	Staff Attorney		12	12.25	\$400.00	\$4,900.00
05/26/2020	Justin Ratliff	Staff Attorney		12	2.50	\$350.00	\$875.00
05/26/2020	Lauren Cormier	Staff Attorney		12	8.50	\$375.00	\$3,187.50
05/26/2020	Monique Hardial	Staff Attorney		12	9.25	\$375.00	\$3,468.75
05/26/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
05/26/2020	Stephen Imundo	Senior Staff Attorneys		12	11.75	\$425.00	\$4,993.75
05/26/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
05/27/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/27/2020	Brian Chau	Senior Staff Attorneys		12	10.00	\$425.00	\$4,250.00
05/27/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
05/27/2020	Erick Ladson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
05/27/2020	Esinam Quarco	Staff Attorney		12	7.50	\$400.00	\$3,000.00
05/27/2020	Helen Fikrey	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/27/2020	Ibrahim Hamed	Staff Attorney		12	10.00	\$400.00	\$4,000.00
05/27/2020	Igor Faynshteyn	Staff Attorney		12	10.00	\$375.00	\$3,750.00
05/27/2020	Ingvar Olsson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
05/27/2020	Jed Koslow	Staff Attorney		12	3.25	\$400.00	\$1,300.00
05/27/2020	Jed Koslow	Staff Attorney		12	7.50	\$400.00	\$3,000.00
05/27/2020	Lauren Cormier	Staff Attorney		12	7.50	\$375.00	\$2,812.50
05/27/2020	Monique Hardial	Staff Attorney		12	9.00	\$375.00	\$3,375.00

05/27/2020	Ryan Dykhous	Associate		12	0.50	\$425.00	\$212.50
05/27/2020	Stephen Imundo	Senior Staff Attorneys		12	8.25	\$425.00	\$3,506.25
05/27/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
05/27/2020	Rebecca Boon	Partner		12	0.50	\$875.00	\$437.50
05/28/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/28/2020	Brian Chau	Senior Staff Attorneys		12	10.00	\$425.00	\$4,250.00
05/28/2020	Colette Foster	Staff Attorney		12	10.50	\$400.00	\$4,200.00
05/28/2020	Erick Ladson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
05/28/2020	Esinam Quarco	Staff Attorney		12	4.00	\$400.00	\$1,600.00
05/28/2020	Helen Fikrey	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/28/2020	Ibrahim Hamed	Staff Attorney		12	10.50	\$400.00	\$4,200.00
05/28/2020	Igor Faynshteyn	Staff Attorney		12	10.00	\$375.00	\$3,750.00
05/28/2020	Ingvar Olsson	Staff Attorney		12	11.75	\$400.00	\$4,700.00
05/28/2020	Jed Koslow	Staff Attorney		12	11.00	\$400.00	\$4,400.00
05/28/2020	Justin Ratliff	Staff Attorney		12	3.50	\$350.00	\$1,225.00
05/28/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/28/2020	Monique Hardial	Staff Attorney		12	10.00	\$375.00	\$3,750.00
05/28/2020	Stephen Imundo	Senior Staff Attorneys		12	8.50	\$425.00	\$3,612.50
05/28/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
05/29/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/29/2020	Brian Chau	Senior Staff Attorneys		12	10.00	\$425.00	\$4,250.00
05/29/2020	Colette Foster	Staff Attorney		12	7.50	\$400.00	\$3,000.00
05/29/2020	Erick Ladson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
05/29/2020	Esinam Quarco	Staff Attorney		12	6.00	\$400.00	\$2,400.00
05/29/2020	Helen Fikrey	Staff Attorney		12	8.25	\$400.00	\$3,300.00
05/29/2020	Ibrahim Hamed	Staff Attorney		12	9.25	\$400.00	\$3,700.00
05/29/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/29/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
05/29/2020	Jed Koslow	Staff Attorney		12	6.00	\$400.00	\$2,400.00
05/29/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
05/29/2020	Monique Hardial	Staff Attorney		12	8.50	\$375.00	\$3,187.50
05/29/2020	Stephen Imundo	Senior Staff Attorneys		12	5.50	\$425.00	\$2,337.50
05/29/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00

05/30/2020	Addison F. Golladay	Staff Attorney		12	3.50	\$400.00	\$1,400.00
05/30/2020	Esinam Quarco	Staff Attorney		12	9.00	\$400.00	\$3,600.00
05/30/2020	Helen Fikrey	Staff Attorney		12	7.00	\$400.00	\$2,800.00
05/30/2020	Justin Ratliff	Staff Attorney		12	6.50	\$350.00	\$2,275.00
05/30/2020	Monique Hardial	Staff Attorney		12	3.25	\$375.00	\$1,218.75
05/30/2020	Stephen Imundo	Senior Staff Attorneys		12	3.25	\$425.00	\$1,381.25
05/31/2020	Addison F. Golladay	Staff Attorney		12	3.50	\$400.00	\$1,400.00
05/31/2020	Colette Foster	Staff Attorney		12	3.00	\$400.00	\$1,200.00
05/31/2020	Esinam Quarco	Staff Attorney		12	3.50	\$400.00	\$1,400.00
05/31/2020	Justin Ratliff	Staff Attorney		12	11.00	\$350.00	\$3,850.00
06/01/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/01/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/01/2020	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/01/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/01/2020	Esinam Quarco	Staff Attorney		12	7.00	\$400.00	\$2,800.00
06/01/2020	Helen Fikrey	Staff Attorney		12	10.25	\$400.00	\$4,100.00
06/01/2020	Ibrahim Hamed	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/01/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/01/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/01/2020	Jed Koslow	Staff Attorney		12	11.50	\$400.00	\$4,600.00
06/01/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/01/2020	Mahiri Buffong	Managing Clerk		12	0.25	\$375.00	\$93.75
06/01/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/01/2020	Stephen Imundo	Senior Staff Attorneys		12	9.25	\$425.00	\$3,931.25
06/01/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
06/02/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/02/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/02/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
06/02/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/02/2020	Esinam Quarco	Staff Attorney		12	7.75	\$400.00	\$3,100.00
06/02/2020	Helen Fikrey	Staff Attorney		12	4.00	\$400.00	\$1,600.00

06/02/2020	Ibrahim Hamed	Staff Attorney		12	9.50	\$400.00	\$3,800.00
06/02/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/02/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/02/2020	Jed Koslow	Staff Attorney		12	7.75	\$400.00	\$3,100.00
06/02/2020	Justin Ratliff	Staff Attorney		12	1.50	\$350.00	\$525.00
06/02/2020	Monique Hardial	Staff Attorney		12	10.00	\$375.00	\$3,750.00
06/02/2020	Stephen Imundo	Senior Staff Attorneys		12	7.50	\$425.00	\$3,187.50
06/02/2020	Stephen Imundo	Senior Staff Attorneys		12	2.50	\$425.00	\$1,062.50
06/02/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
06/03/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/03/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/03/2020	Colette Foster	Staff Attorney		12	7.75	\$400.00	\$3,100.00
06/03/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/03/2020	Esinam Quarco	Staff Attorney		12	5.50	\$400.00	\$2,200.00
06/03/2020	Helen Fikrey	Staff Attorney		12	1.50	\$400.00	\$600.00
06/03/2020	Helen Fikrey	Staff Attorney		12	6.00	\$400.00	\$2,400.00
06/03/2020	Ibrahim Hamed	Staff Attorney		12	8.50	\$400.00	\$3,400.00
06/03/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
06/03/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/03/2020	Jed Koslow	Staff Attorney		12	9.75	\$400.00	\$3,900.00
06/03/2020	Jose Echegaray	Case Managers		12	0.75	\$350.00	\$262.50
06/03/2020	Justin Ratliff	Staff Attorney		12	5.75	\$350.00	\$2,012.50
06/03/2020	Justin Ratliff	Staff Attorney		12	0.50	\$350.00	\$175.00
06/03/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/03/2020	Monique Hardial	Staff Attorney		12	8.50	\$375.00	\$3,187.50
06/03/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
06/03/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
06/03/2020	Jeremy Robinson	Partner		12	2.50	\$900.00	\$2,250.00
06/04/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/04/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00

06/04/2020	Colette Foster	Staff Attorney		12	3.75	\$400.00	\$1,500.00
06/04/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/04/2020	Esinam Quarco	Staff Attorney		12	6.25	\$400.00	\$2,500.00
06/04/2020	Helen Fikrey	Staff Attorney		12	6.75	\$400.00	\$2,700.00
06/04/2020	Ibrahim Hamed	Staff Attorney		12	7.25	\$400.00	\$2,900.00
06/04/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
06/04/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/04/2020	Jed Koslow	Staff Attorney		12	5.00	\$400.00	\$2,000.00
06/04/2020	Justin Ratliff	Staff Attorney		12	8.50	\$350.00	\$2,975.00
06/04/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/04/2020	Monique Hardial	Staff Attorney		12	8.25	\$375.00	\$3,093.75
06/04/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/04/2020	William Pham	Staff Attorney		12	6.00	\$375.00	\$2,250.00
06/05/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/05/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/05/2020	Colette Foster	Staff Attorney		12	9.50	\$400.00	\$3,800.00
06/05/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/05/2020	Helen Fikrey	Staff Attorney		12	9.00	\$400.00	\$3,600.00
06/05/2020	Ibrahim Hamed	Staff Attorney		12	4.75	\$400.00	\$1,900.00
06/05/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/05/2020	Jed Koslow	Staff Attorney		12	6.00	\$400.00	\$2,400.00
06/05/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/05/2020	Monique Hardial	Staff Attorney		12	5.25	\$375.00	\$1,968.75
06/05/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
06/06/2020	Esinam Quarco	Staff Attorney		12	6.00	\$400.00	\$2,400.00
06/06/2020	Justin Ratliff	Staff Attorney		12	2.00	\$350.00	\$700.00
06/07/2020	Esinam Quarco	Staff Attorney		12	7.50	\$400.00	\$3,000.00
06/07/2020	Helen Fikrey	Staff Attorney		12	1.00	\$400.00	\$400.00
06/07/2020	Justin Ratliff	Staff Attorney		12	12.00	\$350.00	\$4,200.00
06/08/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00

06/08/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/08/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
06/08/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/08/2020	Esinam Quarco	Staff Attorney		12	5.25	\$400.00	\$2,100.00
06/08/2020	Helen Fikrey	Staff Attorney		12	5.25	\$400.00	\$2,100.00
06/08/2020	Ibrahim Hamed	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/08/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/08/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/08/2020	Jed Koslow	Staff Attorney		12	11.75	\$400.00	\$4,700.00
06/08/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/08/2020	Monique Hardial	Staff Attorney		12	8.50	\$375.00	\$3,187.50
06/08/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/08/2020	William Pham	Staff Attorney		12	11.50	\$375.00	\$4,312.50
06/09/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/09/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/09/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/09/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/09/2020	Esinam Quarco	Staff Attorney		12	5.50	\$400.00	\$2,200.00
06/09/2020	Helen Fikrey	Staff Attorney		12	8.25	\$400.00	\$3,300.00
06/09/2020	Ibrahim Hamed	Staff Attorney		12	9.50	\$400.00	\$3,800.00
06/09/2020	Igor Faynshteyn	Staff Attorney		12	5.50	\$375.00	\$2,062.50
06/09/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/09/2020	Jed Koslow	Staff Attorney		12	6.75	\$400.00	\$2,700.00
06/09/2020	Jed Koslow	Staff Attorney		12	3.75	\$400.00	\$1,500.00
06/09/2020	Justin Ratliff	Staff Attorney		12	4.00	\$350.00	\$1,400.00
06/09/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/09/2020	Monique Hardial	Staff Attorney		12	7.50	\$375.00	\$2,812.50
06/09/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/09/2020	Stephen Imundo	Senior Staff Attorneys		12	4.50	\$425.00	\$1,912.50
06/09/2020	Stephen Imundo	Senior Staff Attorneys		12	1.50	\$425.00	\$637.50

06/09/2020	William Pham	Staff Attorney		12	7.50	\$375.00	\$2,812.50
06/10/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/10/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/10/2020	Colette Foster	Staff Attorney		12	6.25	\$400.00	\$2,500.00
06/10/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/10/2020	Esinam Quarco	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/10/2020	Helen Fikrey	Staff Attorney		12	8.50	\$400.00	\$3,400.00
06/10/2020	Ibrahim Hamed	Staff Attorney		12	7.50	\$400.00	\$3,000.00
06/10/2020	Igor Faynshteyn	Staff Attorney		12	9.50	\$375.00	\$3,562.50
06/10/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/10/2020	Jed Koslow	Staff Attorney		12	2.00	\$400.00	\$800.00
06/10/2020	Jed Koslow	Staff Attorney		12	5.75	\$400.00	\$2,300.00
06/10/2020	Juan Lossada	Staff Attorney		12	0.50	\$400.00	\$200.00
06/10/2020	Justin Ratliff	Staff Attorney		12	3.50	\$350.00	\$1,225.00
06/10/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/10/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/10/2020	Stephen Imundo	Senior Staff Attorneys		12	9.50	\$425.00	\$4,037.50
06/10/2020	William Pham	Staff Attorney		12	7.75	\$375.00	\$2,906.25
06/10/2020	Jeremy Robinson	Partner		12	2.50	\$900.00	\$2,250.00
06/11/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/11/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/11/2020	Colette Foster	Staff Attorney		12	7.00	\$400.00	\$2,800.00
06/11/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/11/2020	Esinam Quarco	Staff Attorney		12	6.00	\$400.00	\$2,400.00
06/11/2020	Helen Fikrey	Staff Attorney		12	8.50	\$400.00	\$3,400.00
06/11/2020	Ibrahim Hamed	Staff Attorney		12	7.50	\$400.00	\$3,000.00
06/11/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00

06/11/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/11/2020	Jed Koslow	Staff Attorney		12	6.00	\$400.00	\$2,400.00
06/11/2020	Jose Echegaray	Case Managers		12	0.25	\$350.00	\$87.50
06/11/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/11/2020	Justin Ratliff	Staff Attorney		12	0.50	\$350.00	\$175.00
06/11/2020	Justin Ratliff	Staff Attorney		12	6.00	\$350.00	\$2,100.00
06/11/2020	Monique Hardial	Staff Attorney		12	10.00	\$375.00	\$3,750.00
06/11/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
06/11/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
06/11/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/11/2020	Stephen Imundo	Senior Staff Attorneys		12	4.25	\$425.00	\$1,806.25
06/11/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
06/12/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/12/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/12/2020	Colette Foster	Staff Attorney		12	8.25	\$400.00	\$3,300.00
06/12/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/12/2020	Esinam Quarco	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/12/2020	Helen Fikrey	Staff Attorney		12	9.50	\$400.00	\$3,800.00
06/12/2020	Ibrahim Hamed	Staff Attorney		12	5.50	\$400.00	\$2,200.00
06/12/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
06/12/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/12/2020	Jed Koslow	Staff Attorney		12	4.00	\$400.00	\$1,600.00
06/12/2020	Johanna Pitcairn	Litigation Support		12	4.00	\$400.00	\$1,600.00
06/12/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/12/2020	Justin Ratliff	Staff Attorney		12	5.25	\$350.00	\$1,837.50
06/12/2020	Justin Ratliff	Staff Attorney		12	4.25	\$350.00	\$1,487.50
06/12/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/12/2020	Monique Hardial	Staff Attorney		12	6.00	\$375.00	\$2,250.00
06/12/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/12/2020	William Pham	Staff Attorney		12	4.25	\$375.00	\$1,593.75

06/13/2020	Justin Ratliff	Staff Attorney		12	6.00	\$350.00	\$2,100.00
06/14/2020	Colette Foster	Staff Attorney		12	2.00	\$400.00	\$800.00
06/14/2020	Esinam Quarco	Staff Attorney		12	5.25	\$400.00	\$2,100.00
06/14/2020	Justin Ratliff	Staff Attorney		12	10.50	\$350.00	\$3,675.00
06/15/2020	Addison F. Golladay	Staff Attorney		12	9.00	\$400.00	\$3,600.00
06/15/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/15/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
06/15/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/15/2020	Esinam Quarco	Staff Attorney		12	5.25	\$400.00	\$2,100.00
06/15/2020	Helen Fikrey	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/15/2020	Ibrahim Hamed	Staff Attorney		12	8.50	\$400.00	\$3,400.00
06/15/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/15/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/15/2020	Jed Koslow	Staff Attorney		12	7.50	\$400.00	\$3,000.00
06/15/2020	Jed Koslow	Staff Attorney		12	2.50	\$400.00	\$1,000.00
06/15/2020	Johanna Pitcairn	Litigation Support		12	0.50	\$400.00	\$200.00
06/15/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/15/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/15/2020	Monique Hardial	Staff Attorney		12	8.50	\$375.00	\$3,187.50
06/15/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
06/15/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/15/2020	Stephen Imundo	Senior Staff Attorneys		12	5.00	\$425.00	\$2,125.00
06/15/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
06/16/2020	Addison F. Golladay	Staff Attorney		12	4.25	\$400.00	\$1,700.00
06/16/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/16/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/16/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/16/2020	Esinam Quarco	Staff Attorney		12	9.50	\$400.00	\$3,800.00
06/16/2020	Helen Fikrey	Staff Attorney		12	9.75	\$400.00	\$3,900.00

06/16/2020	Ibrahim Hamed	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/16/2020	Ingvar Olsson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
06/16/2020	Jed Koslow	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/16/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/16/2020	Lauren Cormier	Staff Attorney		12	4.00	\$375.00	\$1,500.00
06/16/2020	Monique Hardial	Staff Attorney		12	8.50	\$375.00	\$3,187.50
06/16/2020	Ryan Dykhhouse	Associate		12	0.50	\$425.00	\$212.50
06/16/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/16/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
06/17/2020	Brian Chau	Senior Staff Attorneys		12	9.00	\$425.00	\$3,825.00
06/17/2020	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/17/2020	Erick Ladson	Staff Attorney		12	14.00	\$400.00	\$5,600.00
06/17/2020	Esinam Quarco	Staff Attorney		12	10.25	\$400.00	\$4,100.00
06/17/2020	Helen Fikrey	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/17/2020	Ibrahim Hamed	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/17/2020	Ingvar Olsson	Staff Attorney		12	10.50	\$400.00	\$4,200.00
06/17/2020	Jed Koslow	Staff Attorney		12	10.25	\$400.00	\$4,100.00
06/17/2020	Jose Echegaray	Case Managers		12	1.00	\$350.00	\$350.00
06/17/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/17/2020	Justin Ratliff	Staff Attorney		12	5.00	\$350.00	\$1,750.00
06/17/2020	Monique Hardial	Staff Attorney		12	8.50	\$375.00	\$3,187.50
06/17/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/17/2020	Stephen Imundo	Senior Staff Attorneys		12	12.75	\$425.00	\$5,418.75
06/17/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
06/17/2020	Jeremy Robinson	Partner		12	4.50	\$900.00	\$4,050.00
06/18/2020	Brian Chau	Senior Staff Attorneys		12	9.00	\$425.00	\$3,825.00
06/18/2020	Colette Foster	Staff Attorney		12	10.50	\$400.00	\$4,200.00
06/18/2020	Erick Ladson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/18/2020	Esinam Quarco	Staff Attorney		12	10.75	\$400.00	\$4,300.00
06/18/2020	Helen Fikrey	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/18/2020	Ibrahim Hamed	Staff Attorney		12	9.25	\$400.00	\$3,700.00

06/18/2020	Ingvar Olsson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/18/2020	Jacob Foster	Investigator		12	1.25	\$300.00	\$375.00
06/18/2020	Jed Koslow	Staff Attorney		12	2.00	\$400.00	\$800.00
06/18/2020	Jed Koslow	Staff Attorney		12	7.75	\$400.00	\$3,100.00
06/18/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/18/2020	Justin Ratliff	Staff Attorney		12	9.25	\$350.00	\$3,237.50
06/18/2020	Monique Hardial	Staff Attorney		12	9.50	\$375.00	\$3,562.50
06/18/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
06/18/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/18/2020	Stephen Imundo	Senior Staff Attorneys		12	8.25	\$425.00	\$3,506.25
06/18/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
06/20/2020	Esinam Quarco	Staff Attorney		12	4.25	\$400.00	\$1,700.00
06/20/2020	Ibrahim Hamed	Staff Attorney		12	2.25	\$400.00	\$900.00
06/20/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/20/2020	Justin Ratliff	Staff Attorney		12	12.50	\$350.00	\$4,375.00
06/20/2020	Monique Hardial	Staff Attorney		12	5.00	\$375.00	\$1,875.00
06/20/2020	Ryan McCurdy	Staff Attorney		12	4.50	\$400.00	\$1,800.00
06/21/2020	Colette Foster	Staff Attorney		12	3.00	\$400.00	\$1,200.00
06/21/2020	Justin Ratliff	Staff Attorney		12	3.00	\$350.00	\$1,050.00
06/21/2020	Justin Ratliff	Staff Attorney		12	8.75	\$350.00	\$3,062.50
06/21/2020	Ryan McCurdy	Staff Attorney		12	3.50	\$400.00	\$1,400.00
06/22/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/22/2020	Colette Foster	Staff Attorney		12	9.50	\$400.00	\$3,800.00
06/22/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/22/2020	Esinam Quarco	Staff Attorney		12	10.75	\$400.00	\$4,300.00
06/22/2020	Helen Fikrey	Staff Attorney		12	5.00	\$400.00	\$2,000.00
06/22/2020	Ibrahim Hamed	Staff Attorney		12	9.25	\$400.00	\$3,700.00
06/22/2020	Igor Faynshteyn	Staff Attorney		12	8.50	\$375.00	\$3,187.50
06/22/2020	Ingvar Olsson	Staff Attorney		12	9.50	\$400.00	\$3,800.00
06/22/2020	Jed Koslow	Staff Attorney		12	12.00	\$400.00	\$4,800.00
06/22/2020	Johanna Pitcairn	Litigation Support		12	3.00	\$400.00	\$1,200.00
06/22/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/22/2020	Justin Ratliff	Staff Attorney		12	2.00	\$350.00	\$700.00
06/22/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00

06/22/2020	Ryan Dykhous	Associate		12	1.50	\$425.00	\$637.50
06/22/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/22/2020	Stephen Imundo	Senior Staff Attorneys		12	16.75	\$425.00	\$7,118.75
06/22/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
06/23/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/23/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
06/23/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/23/2020	Esinam Quarco	Staff Attorney		12	11.00	\$400.00	\$4,400.00
06/23/2020	Helen Fikrey	Staff Attorney		12	8.50	\$400.00	\$3,400.00
06/23/2020	Ibrahim Hamed	Staff Attorney		12	9.00	\$400.00	\$3,600.00
06/23/2020	Igor Faynshteyn	Staff Attorney		12	7.50	\$375.00	\$2,812.50
06/23/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/23/2020	Jed Koslow	Staff Attorney		12	10.25	\$400.00	\$4,100.00
06/23/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/23/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/23/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/23/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/23/2020	Stephen Imundo	Senior Staff Attorneys		12	9.75	\$425.00	\$4,143.75
06/23/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
06/24/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/24/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/24/2020	Colette Foster	Staff Attorney		12	9.25	\$400.00	\$3,700.00
06/24/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/24/2020	Esinam Quarco	Staff Attorney		12	7.50	\$400.00	\$3,000.00
06/24/2020	Helen Fikrey	Staff Attorney		12	5.50	\$400.00	\$2,200.00
06/24/2020	Ibrahim Hamed	Staff Attorney		12	8.75	\$400.00	\$3,500.00
06/24/2020	Igor Faynshteyn	Staff Attorney		12	8.50	\$375.00	\$3,187.50
06/24/2020	Ingvar Olsson	Staff Attorney		12	7.50	\$400.00	\$3,000.00

06/24/2020	Jed Koslow	Staff Attorney		12	6.50	\$400.00	\$2,600.00
06/24/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/24/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/24/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/24/2020	Ryan Dykhous	Associate		12	0.50	\$425.00	\$212.50
06/24/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/24/2020	Stephen Imundo	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/24/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
06/25/2020	Addison F. Golladay	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/25/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/25/2020	Colette Foster	Staff Attorney		12	6.00	\$400.00	\$2,400.00
06/25/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/25/2020	Esinam Quarco	Staff Attorney		12	5.00	\$400.00	\$2,000.00
06/25/2020	Helen Fikrey	Staff Attorney		12	5.00	\$400.00	\$2,000.00
06/25/2020	Ibrahim Hamed	Staff Attorney		12	7.75	\$400.00	\$3,100.00
06/25/2020	Ingvar Olsson	Staff Attorney		12	6.00	\$400.00	\$2,400.00
06/25/2020	Jed Koslow	Staff Attorney		12	6.00	\$400.00	\$2,400.00
06/25/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/25/2020	Justin Ratliff	Staff Attorney		12	4.00	\$350.00	\$1,400.00
06/25/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/25/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/25/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/25/2020	Stephen Imundo	Senior Staff Attorneys		12	3.50	\$425.00	\$1,487.50
06/25/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
06/26/2020	Addison F. Golladay	Staff Attorney		12	1.50	\$400.00	\$600.00
06/26/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
06/26/2020	Colette Foster	Staff Attorney		12	6.25	\$400.00	\$2,500.00
06/26/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/26/2020	Esinam Quarco	Staff Attorney		12	5.75	\$400.00	\$2,300.00
06/26/2020	Helen Fikrey	Staff Attorney		12	9.00	\$400.00	\$3,600.00
06/26/2020	Ibrahim Hamed	Staff Attorney		12	5.25	\$400.00	\$2,100.00

06/26/2020	Igor Faynshteyn	Staff Attorney		12	6.50	\$375.00	\$2,437.50
06/26/2020	Ingvar Olsson	Staff Attorney		12	5.75	\$400.00	\$2,300.00
06/26/2020	Jed Koslow	Staff Attorney		12	5.25	\$400.00	\$2,100.00
06/26/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/26/2020	Justin Ratliff	Staff Attorney		12	9.00	\$350.00	\$3,150.00
06/26/2020	Lauren Cormier	Staff Attorney		12	5.00	\$375.00	\$1,875.00
06/26/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/26/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/26/2020	Stephen Imundo	Senior Staff Attorneys		12	2.00	\$425.00	\$850.00
06/26/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
06/27/2020	Justin Ratliff	Staff Attorney		12	4.00	\$350.00	\$1,400.00
06/27/2020	Justin Ratliff	Staff Attorney		12	1.50	\$350.00	\$525.00
06/28/2020	Helen Fikrey	Staff Attorney		12	7.00	\$400.00	\$2,800.00
06/28/2020	Justin Ratliff	Staff Attorney		12	11.00	\$350.00	\$3,850.00
06/29/2020	Addison F. Golladay	Staff Attorney		12	9.00	\$400.00	\$3,600.00
06/29/2020	Brian Chau	Senior Staff Attorneys		12	9.00	\$425.00	\$3,825.00
06/29/2020	Colette Foster	Staff Attorney		12	6.50	\$400.00	\$2,600.00
06/29/2020	Erick Ladson	Staff Attorney		12	10.50	\$400.00	\$4,200.00
06/29/2020	Esinam Quarco	Staff Attorney		12	8.50	\$400.00	\$3,400.00
06/29/2020	Helen Fikrey	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/29/2020	Ibrahim Hamed	Staff Attorney		12	11.25	\$400.00	\$4,500.00
06/29/2020	Ingvar Olsson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
06/29/2020	Jed Koslow	Staff Attorney		12	12.75	\$400.00	\$5,100.00
06/29/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/29/2020	Justin Ratliff	Staff Attorney		12	1.00	\$350.00	\$350.00
06/29/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/29/2020	Monique Hardial	Staff Attorney		12	8.50	\$375.00	\$3,187.50
06/29/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/29/2020	Stephen Imundo	Senior Staff Attorneys		12	12.00	\$425.00	\$5,100.00
06/29/2020	William Pham	Staff Attorney		12	11.00	\$375.00	\$4,125.00
06/30/2020	Addison F. Golladay	Staff Attorney		12	9.00	\$400.00	\$3,600.00
06/30/2020	Brian Chau	Senior Staff Attorneys		12	9.00	\$425.00	\$3,825.00
06/30/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00

06/30/2020	Erick Ladson	Staff Attorney		12	10.50	\$400.00	\$4,200.00
06/30/2020	Esinam Quarco	Staff Attorney		12	9.00	\$400.00	\$3,600.00
06/30/2020	Helen Fikrey	Staff Attorney		12	2.00	\$400.00	\$800.00
06/30/2020	Ibrahim Hamed	Staff Attorney		12	10.75	\$400.00	\$4,300.00
06/30/2020	Ingvar Olsson	Staff Attorney		12	9.75	\$400.00	\$3,900.00
06/30/2020	Jed Koslow	Staff Attorney		12	10.75	\$400.00	\$4,300.00
06/30/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/30/2020	Justin Ratliff	Staff Attorney		12	3.00	\$350.00	\$1,050.00
06/30/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
06/30/2020	Monique Hardial	Staff Attorney		12	9.50	\$375.00	\$3,562.50
06/30/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
06/30/2020	William Pham	Staff Attorney		12	10.25	\$375.00	\$3,843.75
07/01/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/01/2020	Brian Chau	Senior Staff Attorneys		12	9.00	\$425.00	\$3,825.00
07/01/2020	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
07/01/2020	Erick Ladson	Staff Attorney		12	11.00	\$400.00	\$4,400.00
07/01/2020	Esinam Quarco	Staff Attorney		12	11.00	\$400.00	\$4,400.00
07/01/2020	Helen Fikrey	Staff Attorney		12	11.00	\$400.00	\$4,400.00
07/01/2020	Ibrahim Hamed	Staff Attorney		12	9.50	\$400.00	\$3,800.00
07/01/2020	Igor Faynshteyn	Staff Attorney		12	10.00	\$375.00	\$3,750.00
07/01/2020	Ingvar Olsson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
07/01/2020	Jed Koslow	Staff Attorney		12	2.25	\$400.00	\$900.00
07/01/2020	Jed Koslow	Staff Attorney		12	8.25	\$400.00	\$3,300.00
07/01/2020	Jose Echegaray	Case Managers		12	0.75	\$350.00	\$262.50
07/01/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/01/2020	Justin Ratliff	Staff Attorney		12	0.75	\$350.00	\$262.50
07/01/2020	Justin Ratliff	Staff Attorney		12	5.00	\$350.00	\$1,750.00
07/01/2020	Monique Hardial	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/01/2020	Ryan Dykhhouse	Associate		12	1.50	\$425.00	\$637.50
07/01/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/01/2020	Stephen Imundo	Senior Staff Attorneys		12	8.75	\$425.00	\$3,718.75

07/01/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
07/01/2020	Jeremy Robinson	Partner		12	2.00	\$900.00	\$1,800.00
07/02/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/02/2020	Brian Chau	Senior Staff Attorneys		12	9.00	\$425.00	\$3,825.00
07/02/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/02/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/02/2020	Esinam Quarco	Staff Attorney		12	6.00	\$400.00	\$2,400.00
07/02/2020	Helen Fikrey	Staff Attorney		12	11.00	\$400.00	\$4,400.00
07/02/2020	Ibrahim Hamed	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/02/2020	Igor Faynshteyn	Staff Attorney		12	10.00	\$375.00	\$3,750.00
07/02/2020	Ingvar Olsson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
07/02/2020	Jed Koslow	Staff Attorney		12	6.00	\$400.00	\$2,400.00
07/02/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/02/2020	Monique Hardial	Staff Attorney		12	8.50	\$375.00	\$3,187.50
07/02/2020	Ryan Dykhous	Associate		12	0.50	\$425.00	\$212.50
07/02/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/02/2020	Stephen Imundo	Senior Staff Attorneys		12	9.75	\$425.00	\$4,143.75
07/02/2020	William Pham	Staff Attorney		12	8.75	\$375.00	\$3,281.25
07/02/2020	Jeremy Robinson	Partner		12	8.50	\$900.00	\$7,650.00
07/03/2020	Jeremy Robinson	Partner		12	8.00	\$900.00	\$7,200.00
07/05/2020	Brian Chau	Senior Staff Attorneys		12	4.00	\$425.00	\$1,700.00
07/05/2020	Colette Foster	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/05/2020	Esinam Quarco	Staff Attorney		12	5.50	\$400.00	\$2,200.00
07/05/2020	Igor Faynshteyn	Staff Attorney		12	2.00	\$375.00	\$750.00
07/05/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/05/2020	Justin Ratliff	Staff Attorney		12	2.00	\$350.00	\$700.00
07/05/2020	Justin Ratliff	Staff Attorney		12	9.25	\$350.00	\$3,237.50
07/05/2020	Monique Hardial	Staff Attorney		12	4.50	\$375.00	\$1,687.50
07/05/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/06/2020	Addison F. Golladay	Staff Attorney		12	9.00	\$400.00	\$3,600.00

07/06/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/06/2020	Colette Foster	Staff Attorney		12	8.25	\$400.00	\$3,300.00
07/06/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/06/2020	Esinam Quarco	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/06/2020	Helen Fikrey	Staff Attorney		12	7.00	\$400.00	\$2,800.00
07/06/2020	Ibrahim Hamed	Staff Attorney		12	9.25	\$400.00	\$3,700.00
07/06/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/06/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/06/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/06/2020	Justin Ratliff	Staff Attorney		12	1.50	\$350.00	\$525.00
07/06/2020	Monique Hardial	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/06/2020	Ryan Dykhous	Associate		12	0.50	\$425.00	\$212.50
07/06/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/06/2020	Stephen Imundo	Senior Staff Attorneys		12	10.00	\$425.00	\$4,250.00
07/06/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/07/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/07/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/07/2020	Colette Foster	Staff Attorney		12	5.50	\$400.00	\$2,200.00
07/07/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/07/2020	Esinam Quarco	Staff Attorney		12	7.75	\$400.00	\$3,100.00
07/07/2020	Helen Fikrey	Staff Attorney		12	2.25	\$400.00	\$900.00
07/07/2020	Helen Fikrey	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/07/2020	Ibrahim Hamed	Staff Attorney		12	9.75	\$400.00	\$3,900.00
07/07/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/07/2020	Ingvar Olsson	Staff Attorney		12	8.75	\$400.00	\$3,500.00
07/07/2020	Johanna Pitcairn	Litigation Support		12	1.00	\$400.00	\$400.00
07/07/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/07/2020	Justin Ratliff	Staff Attorney		12	2.25	\$350.00	\$787.50
07/07/2020	Monique Hardial	Staff Attorney		12	8.25	\$375.00	\$3,093.75
07/07/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/07/2020	Stephen Imundo	Senior Staff Attorneys		12	12.00	\$425.00	\$5,100.00

07/07/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/08/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/08/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/08/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/08/2020	Erick Ladson	Staff Attorney		12	9.50	\$400.00	\$3,800.00
07/08/2020	Esinam Quarco	Staff Attorney		12	3.00	\$400.00	\$1,200.00
07/08/2020	Helen Fikrey	Staff Attorney		12	0.50	\$400.00	\$200.00
07/08/2020	Helen Fikrey	Staff Attorney		12	0.50	\$400.00	\$200.00
07/08/2020	Ibrahim Hamed	Staff Attorney		12	9.25	\$400.00	\$3,700.00
07/08/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/08/2020	Ingvar Olsson	Staff Attorney		12	8.75	\$400.00	\$3,500.00
07/08/2020	Jed Koslow	Staff Attorney		12	6.00	\$400.00	\$2,400.00
07/08/2020	Jed Koslow	Staff Attorney		12	2.00	\$400.00	\$800.00
07/08/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/08/2020	Justin Ratliff	Staff Attorney		12	3.00	\$350.00	\$1,050.00
07/08/2020	Justin Ratliff	Staff Attorney		12	0.50	\$350.00	\$175.00
07/08/2020	Justin Ratliff	Staff Attorney		12	3.00	\$350.00	\$1,050.00
07/08/2020	Monique Hardial	Staff Attorney		12	5.50	\$375.00	\$2,062.50
07/08/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
07/08/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
07/08/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/08/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
07/08/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/08/2020	Jeremy Robinson	Partner		12	4.00	\$900.00	\$3,600.00
07/09/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/09/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/09/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/09/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/09/2020	Helen Fikrey	Staff Attorney		12	1.50	\$400.00	\$600.00

07/09/2020	Helen Fikrey	Staff Attorney		12	9.50	\$400.00	\$3,800.00
07/09/2020	Ibrahim Hamed	Staff Attorney		12	7.00	\$400.00	\$2,800.00
07/09/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
07/09/2020	Ingvar Olsson	Staff Attorney		12	7.75	\$400.00	\$3,100.00
07/09/2020	Jed Koslow	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/09/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/09/2020	Justin Ratliff	Staff Attorney		12	4.00	\$350.00	\$1,400.00
07/09/2020	Lauren Cormier	Staff Attorney		12	7.00	\$375.00	\$2,625.00
07/09/2020	Monique Hardial	Staff Attorney		12	9.50	\$375.00	\$3,562.50
07/09/2020	Ryan Dykhhouse	Associate		12	1.75	\$425.00	\$743.75
07/09/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/09/2020	Stephen Imundo	Senior Staff Attorneys		12	6.75	\$425.00	\$2,868.75
07/09/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/10/2020	Addison F. Golladay	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/10/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/10/2020	Colette Foster	Staff Attorney		12	9.25	\$400.00	\$3,700.00
07/10/2020	Erick Ladson	Staff Attorney		12	5.50	\$400.00	\$2,200.00
07/10/2020	Esinam Quarco	Staff Attorney		12	7.00	\$400.00	\$2,800.00
07/10/2020	Helen Fikrey	Staff Attorney		12	2.00	\$400.00	\$800.00
07/10/2020	Ibrahim Hamed	Staff Attorney		12	4.75	\$400.00	\$1,900.00
07/10/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/10/2020	Ingvar Olsson	Staff Attorney		12	6.75	\$400.00	\$2,700.00
07/10/2020	Jed Koslow	Staff Attorney		12	2.75	\$400.00	\$1,100.00
07/10/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/10/2020	Justin Ratliff	Staff Attorney		12	3.00	\$350.00	\$1,050.00
07/10/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/10/2020	Monique Hardial	Staff Attorney		12	7.75	\$375.00	\$2,906.25
07/10/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/10/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
07/11/2020	Esinam Quarco	Staff Attorney		12	5.75	\$400.00	\$2,300.00
07/11/2020	Helen Fikrey	Staff Attorney		12	4.75	\$400.00	\$1,900.00
07/11/2020	Jed Koslow	Staff Attorney		12	0.50	\$400.00	\$200.00
07/11/2020	Jed Koslow	Staff Attorney		12	8.25	\$400.00	\$3,300.00
07/11/2020	Justin Ratliff	Staff Attorney		12	12.00	\$350.00	\$4,200.00

07/11/2020	Lauren Cormier	Staff Attorney		12	1.25	\$375.00	\$468.75
07/11/2020	Ryan Dykhous	Associate		12	1.25	\$425.00	\$531.25
07/12/2020	Addison F. Golladay	Staff Attorney		12	1.00	\$400.00	\$400.00
07/12/2020	Helen Fikrey	Staff Attorney		12	5.50	\$400.00	\$2,200.00
07/12/2020	Justin Ratliff	Staff Attorney		12	10.75	\$350.00	\$3,762.50
07/13/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/13/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/13/2020	Colette Foster	Staff Attorney		12	5.75	\$400.00	\$2,300.00
07/13/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/13/2020	Esinam Quarco	Staff Attorney		12	5.00	\$400.00	\$2,000.00
07/13/2020	Helen Fikrey	Staff Attorney		12	7.25	\$400.00	\$2,900.00
07/13/2020	Ibrahim Hamed	Staff Attorney		12	9.50	\$400.00	\$3,800.00
07/13/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/13/2020	Ingvar Olsson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
07/13/2020	Jed Koslow	Staff Attorney		12	3.25	\$400.00	\$1,300.00
07/13/2020	Jed Koslow	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/13/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/13/2020	Justin Ratliff	Staff Attorney		12	1.00	\$350.00	\$350.00
07/13/2020	Lauren Cormier	Staff Attorney		12	7.00	\$375.00	\$2,625.00
07/13/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/13/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
07/13/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/13/2020	Stephen Imundo	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/13/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/14/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/14/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/14/2020	Colette Foster	Staff Attorney		12	9.50	\$400.00	\$3,800.00
07/14/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/14/2020	Esinam Quarco	Staff Attorney		12	10.00	\$400.00	\$4,000.00

07/14/2020	Helen Fikrey	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/14/2020	Ibrahim Hamed	Staff Attorney		12	9.50	\$400.00	\$3,800.00
07/14/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/14/2020	Ingvar Olsson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
07/14/2020	Jed Koslow	Staff Attorney		12	12.75	\$400.00	\$5,100.00
07/14/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/14/2020	Justin Ratliff	Staff Attorney		12	3.00	\$350.00	\$1,050.00
07/14/2020	Lauren Cormier	Staff Attorney		12	7.50	\$375.00	\$2,812.50
07/14/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/14/2020	Ryan Dykhous	Associate		12	1.25	\$425.00	\$531.25
07/14/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/14/2020	Stephen Imundo	Senior Staff Attorneys		12	10.50	\$425.00	\$4,462.50
07/14/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/15/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/15/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/15/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/15/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/15/2020	Esinam Quarco	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/15/2020	Helen Fikrey	Staff Attorney		12	4.00	\$400.00	\$1,600.00
07/15/2020	Helen Fikrey	Staff Attorney		12	5.50	\$400.00	\$2,200.00
07/15/2020	Ibrahim Hamed	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/15/2020	Igor Faynshteyn	Staff Attorney		12	7.50	\$375.00	\$2,812.50
07/15/2020	Ingvar Olsson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
07/15/2020	Jed Koslow	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/15/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/15/2020	Justin Ratliff	Staff Attorney		12	0.50	\$350.00	\$175.00
07/15/2020	Justin Ratliff	Staff Attorney		12	3.00	\$350.00	\$1,050.00
07/15/2020	Lauren Cormier	Staff Attorney		12	4.00	\$375.00	\$1,500.00
07/15/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00

07/15/2020	Ryan Dykhous	Associate		12	2.00	\$425.00	\$850.00
07/15/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
07/15/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/15/2020	Stephen Imundo	Senior Staff Attorneys		12	8.25	\$425.00	\$3,506.25
07/15/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/15/2020	Jeremy Robinson	Partner		12	1.50	\$900.00	\$1,350.00
07/16/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/16/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/16/2020	Colette Foster	Staff Attorney		12	7.25	\$400.00	\$2,900.00
07/16/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/16/2020	Esinam Quarco	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/16/2020	Helen Fikrey	Staff Attorney		12	6.00	\$400.00	\$2,400.00
07/16/2020	Helen Fikrey	Staff Attorney		12	1.00	\$400.00	\$400.00
07/16/2020	Ibrahim Hamed	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/16/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
07/16/2020	Ingvar Olsson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
07/16/2020	Jed Koslow	Staff Attorney		12	1.75	\$400.00	\$700.00
07/16/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/16/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/16/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/16/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/16/2020	Stephen Imundo	Senior Staff Attorneys		12	7.50	\$425.00	\$3,187.50
07/16/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/16/2020	Jeremy Robinson	Partner		12	2.00	\$900.00	\$1,800.00
07/17/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/17/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/17/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/17/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/17/2020	Esinam Quarco	Staff Attorney		12	4.50	\$400.00	\$1,800.00

07/17/2020	Helen Fikrey	Staff Attorney		12	5.50	\$400.00	\$2,200.00
07/17/2020	Ibrahim Hamed	Staff Attorney		12	5.50	\$400.00	\$2,200.00
07/17/2020	Igor Faynshteyn	Staff Attorney		12	7.50	\$375.00	\$2,812.50
07/17/2020	Jed Koslow	Staff Attorney		12	5.25	\$400.00	\$2,100.00
07/17/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/17/2020	Justin Ratliff	Staff Attorney		12	2.25	\$350.00	\$787.50
07/17/2020	Lauren Cormier	Staff Attorney		12	7.50	\$375.00	\$2,812.50
07/17/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/17/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/17/2020	Stephen Imundo	Senior Staff Attorneys		12	5.75	\$425.00	\$2,443.75
07/17/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
07/18/2020	Esinam Quarco	Staff Attorney		12	4.00	\$400.00	\$1,600.00
07/18/2020	Justin Ratliff	Staff Attorney		12	10.50	\$350.00	\$3,675.00
07/19/2020	Addison F. Golladay	Staff Attorney		12	4.50	\$400.00	\$1,800.00
07/19/2020	Helen Fikrey	Staff Attorney		12	4.25	\$400.00	\$1,700.00
07/19/2020	Igor Faynshteyn	Staff Attorney		12	2.00	\$375.00	\$750.00
07/19/2020	Justin Ratliff	Staff Attorney		12	12.00	\$350.00	\$4,200.00
07/19/2020	Justin Ratliff	Staff Attorney		12	2.50	\$350.00	\$875.00
07/19/2020	Lauren Cormier	Staff Attorney		12	6.00	\$375.00	\$2,250.00
07/20/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/20/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/20/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/20/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/20/2020	Helen Fikrey	Staff Attorney		12	7.00	\$400.00	\$2,800.00
07/20/2020	Ibrahim Hamed	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/20/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/20/2020	Jed Koslow	Staff Attorney		12	11.25	\$400.00	\$4,500.00
07/20/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/20/2020	Justin Ratliff	Staff Attorney		12	2.50	\$350.00	\$875.00
07/20/2020	Monique Hardial	Staff Attorney		12	4.00	\$375.00	\$1,500.00
07/20/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/20/2020	Stephen Imundo	Senior Staff Attorneys		12	8.50	\$425.00	\$3,612.50

07/20/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/21/2020	Addison F. Golladay	Staff Attorney		12	7.00	\$400.00	\$2,800.00
07/21/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/21/2020	Colette Foster	Staff Attorney		12	8.75	\$400.00	\$3,500.00
07/21/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/21/2020	Esinam Quarco	Staff Attorney		12	9.50	\$400.00	\$3,800.00
07/21/2020	Helen Fikrey	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/21/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/21/2020	Ingvar Olsson	Staff Attorney		12	8.25	\$400.00	\$3,300.00
07/21/2020	Jed Koslow	Staff Attorney		12	11.75	\$400.00	\$4,700.00
07/21/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/21/2020	Justin Ratliff	Staff Attorney		12	3.25	\$350.00	\$1,137.50
07/21/2020	Monique Hardial	Staff Attorney		12	4.00	\$375.00	\$1,500.00
07/21/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
07/21/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/21/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/22/2020	Addison F. Golladay	Staff Attorney		12	10.00	\$400.00	\$4,000.00
07/22/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/22/2020	Colette Foster	Staff Attorney		12	6.00	\$400.00	\$2,400.00
07/22/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/22/2020	Esinam Quarco	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/22/2020	Helen Fikrey	Staff Attorney		12	2.00	\$400.00	\$800.00
07/22/2020	Helen Fikrey	Staff Attorney		12	1.00	\$400.00	\$400.00
07/22/2020	Ibrahim Hamed	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/22/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/22/2020	Ingvar Olsson	Staff Attorney		12	10.75	\$400.00	\$4,300.00
07/22/2020	Jed Koslow	Staff Attorney		12	10.50	\$400.00	\$4,200.00
07/22/2020	Johanna Pitcairn	Litigation Support		12	0.25	\$400.00	\$100.00
07/22/2020	Jose Echegaray	Case Managers		12	0.25	\$350.00	\$87.50
07/22/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/22/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00

07/22/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
07/22/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/22/2020	Stephen Imundo	Senior Staff Attorneys		12	9.25	\$425.00	\$3,931.25
07/22/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/23/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/23/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/23/2020	Colette Foster	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/23/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/23/2020	Esinam Quarco	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/23/2020	Helen Fikrey	Staff Attorney		12	12.25	\$400.00	\$4,900.00
07/23/2020	Ibrahim Hamed	Staff Attorney		12	7.00	\$400.00	\$2,800.00
07/23/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
07/23/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/23/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/23/2020	Justin Ratliff	Staff Attorney		12	4.00	\$350.00	\$1,400.00
07/23/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/23/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/23/2020	Stephen Imundo	Senior Staff Attorneys		12	7.50	\$425.00	\$3,187.50
07/23/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
07/24/2020	Addison F. Golladay	Staff Attorney		12	7.00	\$400.00	\$2,800.00
07/24/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/24/2020	Colette Foster	Staff Attorney		12	8.75	\$400.00	\$3,500.00
07/24/2020	Erick Ladson	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/24/2020	Esinam Quarco	Staff Attorney		12	9.75	\$400.00	\$3,900.00
07/24/2020	Helen Fikrey	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/24/2020	Ibrahim Hamed	Staff Attorney		12	5.00	\$400.00	\$2,000.00
07/24/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/24/2020	Ingvar Olsson	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/24/2020	Jed Koslow	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/24/2020	Johanna Pitcairn	Litigation Support		12	1.00	\$400.00	\$400.00

07/24/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/24/2020	Justin Ratliff	Staff Attorney		12	2.50	\$350.00	\$875.00
07/24/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/24/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/24/2020	Stephen Imundo	Senior Staff Attorneys		12	5.75	\$425.00	\$2,443.75
07/24/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
07/25/2020	Helen Fikrey	Staff Attorney		12	3.25	\$400.00	\$1,300.00
07/25/2020	Ingvar Olsson	Staff Attorney		12	4.00	\$400.00	\$1,600.00
07/25/2020	Johanna Pitcairn	Litigation Support		12	2.50	\$400.00	\$1,000.00
07/25/2020	Justin Ratliff	Staff Attorney		12	9.25	\$350.00	\$3,237.50
07/26/2020	Esinam Quarco	Staff Attorney		12	2.75	\$400.00	\$1,100.00
07/26/2020	Justin Ratliff	Staff Attorney		12	9.50	\$350.00	\$3,325.00
07/27/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/27/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/27/2020	Colette Foster	Staff Attorney		12	6.00	\$400.00	\$2,400.00
07/27/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/27/2020	Esinam Quarco	Staff Attorney		12	6.50	\$400.00	\$2,600.00
07/27/2020	Ibrahim Hamed	Staff Attorney		12	10.25	\$400.00	\$4,100.00
07/27/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/27/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/27/2020	Jed Koslow	Staff Attorney		12	12.75	\$400.00	\$5,100.00
07/27/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/27/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/27/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/27/2020	Ryan Dykhous	Associate		12	1.25	\$425.00	\$531.25
07/27/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/27/2020	Stephen Imundo	Senior Staff Attorneys		12	9.00	\$425.00	\$3,825.00
07/27/2020	William Pham	Staff Attorney		12	8.50	\$375.00	\$3,187.50
07/28/2020	Addison F. Golladay	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/28/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/28/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00

07/28/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/28/2020	Esinam Quarco	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/28/2020	Helen Fikrey	Staff Attorney		12	3.75	\$400.00	\$1,500.00
07/28/2020	Ibrahim Hamed	Staff Attorney		12	10.25	\$400.00	\$4,100.00
07/28/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
07/28/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/28/2020	Jed Koslow	Staff Attorney		12	11.50	\$400.00	\$4,600.00
07/28/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/28/2020	Justin Ratliff	Staff Attorney		12	3.50	\$350.00	\$1,225.00
07/28/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/28/2020	Monique Hardial	Staff Attorney		12	5.50	\$375.00	\$2,062.50
07/28/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
07/28/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
07/28/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/28/2020	Stephen Imundo	Senior Staff Attorneys		12	9.00	\$425.00	\$3,825.00
07/28/2020	William Pham	Staff Attorney		12	9.50	\$375.00	\$3,562.50
07/29/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/29/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/29/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/29/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/29/2020	Esinam Quarco	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/29/2020	Helen Fikrey	Staff Attorney		12	7.50	\$400.00	\$3,000.00
07/29/2020	Ibrahim Hamed	Staff Attorney		12	10.00	\$400.00	\$4,000.00
07/29/2020	Igor Faynshteyn	Staff Attorney		12	7.50	\$375.00	\$2,812.50
07/29/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/29/2020	Jed Koslow	Staff Attorney		12	2.75	\$400.00	\$1,100.00
07/29/2020	Jed Koslow	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/29/2020	Jose Echegaray	Case Managers		12	0.25	\$350.00	\$87.50
07/29/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/29/2020	Justin Ratliff	Staff Attorney		12	3.50	\$350.00	\$1,225.00
07/29/2020	Justin Ratliff	Staff Attorney		12	4.50	\$350.00	\$1,575.00
07/29/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00

07/29/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/29/2020	Ryan Dykhous	Associate		12	1.50	\$425.00	\$637.50
07/29/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/29/2020	Stephen Imundo	Senior Staff Attorneys		12	9.50	\$425.00	\$4,037.50
07/29/2020	William Pham	Staff Attorney		12	9.25	\$375.00	\$3,468.75
07/29/2020	Jeremy Robinson	Partner		12	7.50	\$900.00	\$6,750.00
07/30/2020	Addison F. Golladay	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/30/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/30/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
07/30/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/30/2020	Esinam Quarco	Staff Attorney		12	7.00	\$400.00	\$2,800.00
07/30/2020	Helen Fikrey	Staff Attorney		12	12.50	\$400.00	\$5,000.00
07/30/2020	Ibrahim Hamed	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/30/2020	Igor Faynshteyn	Staff Attorney		12	6.50	\$375.00	\$2,437.50
07/30/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/30/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/30/2020	Justin Ratliff	Staff Attorney		12	12.00	\$350.00	\$4,200.00
07/30/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/30/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/30/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/30/2020	Stephen Imundo	Senior Staff Attorneys		12	6.00	\$425.00	\$2,550.00
07/30/2020	Stephen Imundo	Senior Staff Attorneys		12	2.25	\$425.00	\$956.25
07/30/2020	William Pham	Staff Attorney		12	8.75	\$375.00	\$3,281.25
07/31/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/31/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
07/31/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
07/31/2020	Erick Ladson	Staff Attorney		12	6.00	\$400.00	\$2,400.00
07/31/2020	Helen Fikrey	Staff Attorney		12	13.50	\$400.00	\$5,400.00
07/31/2020	Ibrahim Hamed	Staff Attorney		12	1.00	\$400.00	\$400.00
07/31/2020	Igor Faynshteyn	Staff Attorney		12	8.50	\$375.00	\$3,187.50
07/31/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/31/2020	Jed Koslow	Staff Attorney		12	1.00	\$400.00	\$400.00
07/31/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00

07/31/2020	Justin Ratliff	Staff Attorney		12	5.25	\$350.00	\$1,837.50
07/31/2020	Justin Ratliff	Staff Attorney		12	2.00	\$350.00	\$700.00
07/31/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/31/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
07/31/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
07/31/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
08/01/2020	Helen Fikrey	Staff Attorney		12	2.75	\$400.00	\$1,100.00
08/01/2020	Jed Koslow	Staff Attorney		12	2.00	\$400.00	\$800.00
08/01/2020	Justin Ratliff	Staff Attorney		12	5.25	\$350.00	\$1,837.50
08/02/2020	Esinam Quarco	Staff Attorney		12	10.00	\$400.00	\$4,000.00
08/02/2020	Igor Faynshteyn	Staff Attorney		12	2.50	\$375.00	\$937.50
08/02/2020	Jed Koslow	Staff Attorney		12	1.00	\$400.00	\$400.00
08/02/2020	Justin Ratliff	Staff Attorney		12	4.00	\$350.00	\$1,400.00
08/03/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/03/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/03/2020	Erick Ladson	Staff Attorney		12	7.00	\$400.00	\$2,800.00
08/03/2020	Helen Fikrey	Staff Attorney		12	10.00	\$400.00	\$4,000.00
08/03/2020	Ibrahim Hamed	Staff Attorney		12	10.50	\$400.00	\$4,200.00
08/03/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/03/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/03/2020	Jed Koslow	Staff Attorney		12	11.75	\$400.00	\$4,700.00
08/03/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/03/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/03/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
08/03/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/03/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/04/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/04/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/04/2020	Erick Ladson	Staff Attorney		12	9.00	\$400.00	\$3,600.00
08/04/2020	Esinam Quarco	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/04/2020	Helen Fikrey	Staff Attorney		12	6.00	\$400.00	\$2,400.00
08/04/2020	Ibrahim Hamed	Staff Attorney		12	9.00	\$400.00	\$3,600.00
08/04/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/04/2020	Ingvar Olsson	Staff Attorney		12	9.00	\$400.00	\$3,600.00
08/04/2020	Jed Koslow	Staff Attorney		12	11.00	\$400.00	\$4,400.00

08/04/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/04/2020	Justin Ratliff	Staff Attorney		12	3.00	\$350.00	\$1,050.00
08/04/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/04/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/04/2020	Ryan Dykhous	Associate		12	1.25	\$425.00	\$531.25
08/04/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/04/2020	William Pham	Staff Attorney		12	6.00	\$375.00	\$2,250.00
08/05/2020	Addison F. Golladay	Staff Attorney		12	9.50	\$400.00	\$3,800.00
08/05/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/05/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/05/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/05/2020	Esinam Quarco	Staff Attorney		12	11.50	\$400.00	\$4,600.00
08/05/2020	Helen Fikrey	Staff Attorney		12	5.75	\$400.00	\$2,300.00
08/05/2020	Ibrahim Hamed	Staff Attorney		12	8.25	\$400.00	\$3,300.00
08/05/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
08/05/2020	Ingvar Olsson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/05/2020	Jed Koslow	Staff Attorney		12	7.75	\$400.00	\$3,100.00
08/05/2020	Jed Koslow	Staff Attorney		12	2.50	\$400.00	\$1,000.00
08/05/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/05/2020	Justin Ratliff	Staff Attorney		12	3.50	\$350.00	\$1,225.00
08/05/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/05/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
08/06/2020	Addison F. Golladay	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/06/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/06/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/06/2020	Erick Ladson	Staff Attorney		12	9.00	\$400.00	\$3,600.00
08/06/2020	Esinam Quarco	Staff Attorney		12	9.00	\$400.00	\$3,600.00
08/06/2020	Ibrahim Hamed	Staff Attorney		12	7.50	\$400.00	\$3,000.00
08/06/2020	Igor Faynshteyn	Staff Attorney		12	6.00	\$375.00	\$2,250.00
08/06/2020	Ingvar Olsson	Staff Attorney		12	6.75	\$400.00	\$2,700.00
08/06/2020	Jed Koslow	Staff Attorney		12	0.75	\$400.00	\$300.00
08/06/2020	Johanna Pitcairn	Litigation Support		12	1.00	\$400.00	\$400.00

08/06/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/06/2020	Justin Ratliff	Staff Attorney		12	5.25	\$350.00	\$1,837.50
08/06/2020	Justin Ratliff	Staff Attorney		12	0.50	\$350.00	\$175.00
08/06/2020	Monique Hardial	Staff Attorney		12	10.50	\$375.00	\$3,937.50
08/06/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/06/2020	Stephen Imundo	Senior Staff Attorneys		12	6.75	\$425.00	\$2,868.75
08/06/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
08/07/2020	Addison F. Golladay	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/07/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/07/2020	Colette Foster	Staff Attorney		12	7.50	\$400.00	\$3,000.00
08/07/2020	Erick Ladson	Staff Attorney		12	6.50	\$400.00	\$2,600.00
08/07/2020	Esinam Quarco	Staff Attorney		12	11.00	\$400.00	\$4,400.00
08/07/2020	Helen Fikrey	Staff Attorney		12	5.50	\$400.00	\$2,200.00
08/07/2020	Helen Fikrey	Staff Attorney		12	3.50	\$400.00	\$1,400.00
08/07/2020	Ibrahim Hamed	Staff Attorney		12	4.75	\$400.00	\$1,900.00
08/07/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/07/2020	Ingvar Olsson	Staff Attorney		12	7.25	\$400.00	\$2,900.00
08/07/2020	Jed Koslow	Staff Attorney		12	6.25	\$400.00	\$2,500.00
08/07/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/07/2020	Justin Ratliff	Staff Attorney		12	2.50	\$350.00	\$875.00
08/07/2020	Justin Ratliff	Staff Attorney		12	0.25	\$350.00	\$87.50
08/07/2020	Lauren Cormier	Staff Attorney		12	10.50	\$375.00	\$3,937.50
08/07/2020	Monique Hardial	Staff Attorney		12	9.50	\$375.00	\$3,562.50
08/07/2020	Ryan Dykhous	Associate		12	1.25	\$425.00	\$531.25
08/07/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/07/2020	Stephen Imundo	Senior Staff Attorneys		12	5.50	\$425.00	\$2,337.50
08/07/2020	William Pham	Staff Attorney		12	5.00	\$375.00	\$1,875.00
08/07/2020	Jeremy Robinson	Partner		12	8.50	\$900.00	\$7,650.00

08/08/2020	Helen Fikrey	Staff Attorney		12	4.00	\$400.00	\$1,600.00
08/08/2020	Justin Ratliff	Staff Attorney		12	12.00	\$350.00	\$4,200.00
08/08/2020	Lauren Cormier	Staff Attorney		12	10.25	\$375.00	\$3,843.75
08/08/2020	Monique Hardial	Staff Attorney		12	4.00	\$375.00	\$1,500.00
08/08/2020	Jeremy Robinson	Partner		12	4.50	\$900.00	\$4,050.00
08/09/2020	Helen Fikrey	Staff Attorney		12	5.25	\$400.00	\$2,100.00
08/09/2020	Igor Faynshteyn	Staff Attorney		12	1.00	\$375.00	\$375.00
08/09/2020	Ingvar Olsson	Staff Attorney		12	0.50	\$400.00	\$200.00
08/09/2020	Justin Ratliff	Staff Attorney		12	12.00	\$350.00	\$4,200.00
08/09/2020	Lauren Cormier	Staff Attorney		12	7.25	\$375.00	\$2,718.75
08/09/2020	Jeremy Robinson	Partner		12	5.50	\$900.00	\$4,950.00
08/10/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/10/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/10/2020	Erick Ladson	Staff Attorney		12	9.50	\$400.00	\$3,800.00
08/10/2020	Esinam Quarco	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/10/2020	Helen Fikrey	Staff Attorney		12	6.00	\$400.00	\$2,400.00
08/10/2020	Ibrahim Hamed	Staff Attorney		12	10.75	\$400.00	\$4,300.00
08/10/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/10/2020	Ingvar Olsson	Staff Attorney		12	1.50	\$400.00	\$600.00
08/10/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/10/2020	Jed Koslow	Staff Attorney		12	12.25	\$400.00	\$4,900.00
08/10/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/10/2020	Justin Ratliff	Staff Attorney		12	7.50	\$350.00	\$2,625.00
08/10/2020	Lauren Cormier	Staff Attorney		12	10.00	\$375.00	\$3,750.00
08/10/2020	Monique Hardial	Staff Attorney		12	10.00	\$375.00	\$3,750.00
08/10/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/10/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/11/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/11/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/11/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/11/2020	Esinam Quarco	Staff Attorney		12	9.50	\$400.00	\$3,800.00

08/11/2020	Helen Fikrey	Staff Attorney		12	7.75	\$400.00	\$3,100.00
08/11/2020	Ibrahim Hamed	Staff Attorney		12	9.75	\$400.00	\$3,900.00
08/11/2020	Igor Faynshteyn	Staff Attorney		12	10.00	\$375.00	\$3,750.00
08/11/2020	Ingvar Olsson	Staff Attorney		12	10.75	\$400.00	\$4,300.00
08/11/2020	Jed Koslow	Staff Attorney		12	13.00	\$400.00	\$5,200.00
08/11/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/11/2020	Justin Ratliff	Staff Attorney		12	5.25	\$350.00	\$1,837.50
08/11/2020	Lauren Cormier	Staff Attorney		12	9.75	\$375.00	\$3,656.25
08/11/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/11/2020	Ryan Dykhous	Associate		12	1.25	\$425.00	\$531.25
08/11/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/11/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/11/2020	Jeremy Robinson	Partner		12	3.50	\$900.00	\$3,150.00
08/12/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/12/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/12/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/12/2020	Esinam Quarco	Staff Attorney		12	7.00	\$400.00	\$2,800.00
08/12/2020	Ibrahim Hamed	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/12/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/12/2020	Ingvar Olsson	Staff Attorney		12	9.75	\$400.00	\$3,900.00
08/12/2020	Jed Koslow	Staff Attorney		12	11.75	\$400.00	\$4,700.00
08/12/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/12/2020	Justin Ratliff	Staff Attorney		12	5.25	\$350.00	\$1,837.50
08/12/2020	Lauren Cormier	Staff Attorney		12	7.00	\$375.00	\$2,625.00
08/12/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/12/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/12/2020	Stephen Imundo	Senior Staff Attorneys		12	7.00	\$425.00	\$2,975.00
08/12/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/13/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/13/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/13/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/13/2020	Esinam Quarco	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/13/2020	Helen Fikrey	Staff Attorney		12	11.75	\$400.00	\$4,700.00
08/13/2020	Ibrahim Hamed	Staff Attorney		12	7.50	\$400.00	\$3,000.00

08/13/2020	Igor Faynshteyn	Staff Attorney	12	6.00	\$375.00	\$2,250.00
08/13/2020	Ingvar Olsson	Staff Attorney	12	8.00	\$400.00	\$3,200.00
08/13/2020	Jed Koslow	Staff Attorney	12	1.75	\$400.00	\$700.00
08/13/2020	Juan Lossada	Staff Attorney	12	8.00	\$400.00	\$3,200.00
08/13/2020	Lauren Cormier	Staff Attorney	12	8.00	\$375.00	\$3,000.00
08/13/2020	Monique Hardial	Staff Attorney	12	8.00	\$375.00	\$3,000.00
08/13/2020	Ryan McCurdy	Staff Attorney	12	8.00	\$400.00	\$3,200.00
08/13/2020	Stephen Imundo	Senior Staff Attorneys	12	6.25	\$425.00	\$2,656.25
08/13/2020	William Pham	Staff Attorney	12	9.00	\$375.00	\$3,375.00
08/13/2020	Jeremy Robinson	Partner	12	5.50	\$900.00	\$4,950.00
08/14/2020	Brian Chau	Senior Staff Attorneys	12	8.00	\$425.00	\$3,400.00
08/14/2020	Colette Foster	Staff Attorney	12	7.50	\$400.00	\$3,000.00
08/14/2020	Erick Ladson	Staff Attorney	12	6.00	\$400.00	\$2,400.00
08/14/2020	Helen Fikrey	Staff Attorney	12	4.00	\$400.00	\$1,600.00
08/14/2020	Ibrahim Hamed	Staff Attorney	12	4.00	\$400.00	\$1,600.00
08/14/2020	Ingvar Olsson	Staff Attorney	12	2.00	\$400.00	\$800.00
08/14/2020	Jed Koslow	Staff Attorney	12	1.25	\$400.00	\$500.00
08/14/2020	Juan Lossada	Staff Attorney	12	8.00	\$400.00	\$3,200.00
08/14/2020	Lauren Cormier	Staff Attorney	12	5.25	\$375.00	\$1,968.75
08/14/2020	Monique Hardial	Staff Attorney	12	6.00	\$375.00	\$2,250.00
08/14/2020	Ryan McCurdy	Staff Attorney	12	8.00	\$400.00	\$3,200.00
08/14/2020	Stephen Imundo	Senior Staff Attorneys	12	3.00	\$425.00	\$1,275.00
08/14/2020	William Pham	Staff Attorney	12	4.00	\$375.00	\$1,500.00
08/14/2020	Jeremy Robinson	Partner	12	4.50	\$900.00	\$4,050.00
08/15/2020	Addison F. Golladay	Staff Attorney	12	8.00	\$400.00	\$3,200.00
08/15/2020	Justin Ratliff	Staff Attorney	12	3.50	\$350.00	\$1,225.00
08/15/2020	Jeremy Robinson	Partner	12	2.00	\$900.00	\$1,800.00
08/16/2020	Addison F. Golladay	Staff Attorney	12	7.00	\$400.00	\$2,800.00
08/16/2020	Esinam Quarco	Staff Attorney	12	7.50	\$400.00	\$3,000.00
08/16/2020	Helen Fikrey	Staff Attorney	12	10.50	\$400.00	\$4,200.00
08/16/2020	Igor Faynshteyn	Staff Attorney	12	7.00	\$375.00	\$2,625.00
08/16/2020	Justin Ratliff	Staff Attorney	12	13.75	\$350.00	\$4,812.50
08/17/2020	Addison F. Golladay	Staff Attorney	12	5.50	\$400.00	\$2,200.00
08/17/2020	Brian Chau	Senior Staff Attorneys	12	8.00	\$425.00	\$3,400.00
08/17/2020	Colette Foster	Staff Attorney	12	8.50	\$400.00	\$3,400.00

08/17/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/17/2020	Esinam Quarco	Staff Attorney		12	6.50	\$400.00	\$2,600.00
08/17/2020	Helen Fikrey	Staff Attorney		12	5.25	\$400.00	\$2,100.00
08/17/2020	Ibrahim Hamed	Staff Attorney		12	10.50	\$400.00	\$4,200.00
08/17/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/17/2020	Ingvar Olsson	Staff Attorney		12	1.25	\$400.00	\$500.00
08/17/2020	Ingvar Olsson	Staff Attorney		12	5.25	\$400.00	\$2,100.00
08/17/2020	Jed Koslow	Staff Attorney		12	9.75	\$400.00	\$3,900.00
08/17/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/17/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/17/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/17/2020	Ryan Dykhous	Associate		12	1.25	\$425.00	\$531.25
08/17/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/17/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/18/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
08/18/2020	Brian Chau	Senior Staff Attorneys		12	7.00	\$425.00	\$2,975.00
08/18/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/18/2020	Erick Ladson	Staff Attorney		12	7.50	\$400.00	\$3,000.00
08/18/2020	Erick Ladson	Staff Attorney		12	1.25	\$400.00	\$500.00
08/18/2020	Esinam Quarco	Staff Attorney		12	9.50	\$400.00	\$3,800.00
08/18/2020	Helen Fikrey	Staff Attorney		12	9.25	\$400.00	\$3,700.00
08/18/2020	Ibrahim Hamed	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/18/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/18/2020	Ingvar Olsson	Staff Attorney		12	7.75	\$400.00	\$3,100.00
08/18/2020	Juan Lossada	Staff Attorney		12	7.25	\$400.00	\$2,900.00
08/18/2020	Justin Ratliff	Staff Attorney		12	4.00	\$350.00	\$1,400.00
08/18/2020	Lauren Cormier	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/18/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/18/2020	Ryan McCurdy	Staff Attorney		12	7.25	\$400.00	\$2,900.00
08/18/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/18/2020	Jeremy Robinson	Partner		12	1.50	\$900.00	\$1,350.00
08/19/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00

08/19/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/19/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/19/2020	Esinam Quarco	Staff Attorney		12	9.50	\$400.00	\$3,800.00
08/19/2020	Helen Fikrey	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/19/2020	Ibrahim Hamed	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/19/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/19/2020	Ingvar Olsson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/19/2020	Jed Koslow	Staff Attorney		12	11.25	\$400.00	\$4,500.00
08/19/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/19/2020	Justin Ratliff	Staff Attorney		12	2.00	\$350.00	\$700.00
08/19/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/19/2020	Monique Hardial	Staff Attorney		12	4.00	\$375.00	\$1,500.00
08/19/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/19/2020	Stephen Imundo	Senior Staff Attorneys		12	7.00	\$425.00	\$2,975.00
08/19/2020	William Pham	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/20/2020	Addison F. Golladay	Staff Attorney		12	5.50	\$400.00	\$2,200.00
08/20/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/20/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
08/20/2020	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/20/2020	Esinam Quarco	Staff Attorney		12	7.00	\$400.00	\$2,800.00
08/20/2020	Helen Fikrey	Staff Attorney		12	4.75	\$400.00	\$1,900.00
08/20/2020	Ibrahim Hamed	Staff Attorney		12	7.25	\$400.00	\$2,900.00
08/20/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/20/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/20/2020	Jed Koslow	Staff Attorney		12	3.75	\$400.00	\$1,500.00
08/20/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/20/2020	Justin Ratliff	Staff Attorney		12	3.00	\$350.00	\$1,050.00
08/20/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/20/2020	Monique Hardial	Staff Attorney		12	4.00	\$375.00	\$1,500.00
08/20/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/20/2020	Stephen Imundo	Senior Staff Attorneys		12	7.00	\$425.00	\$2,975.00
08/20/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00

08/21/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
08/21/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/21/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/21/2020	Erick Ladson	Staff Attorney		12	6.00	\$400.00	\$2,400.00
08/21/2020	Esinam Quarco	Staff Attorney		12	3.25	\$400.00	\$1,300.00
08/21/2020	Helen Fikrey	Staff Attorney		12	9.00	\$400.00	\$3,600.00
08/21/2020	Ibrahim Hamed	Staff Attorney		12	5.00	\$400.00	\$2,000.00
08/21/2020	Igor Faynshteyn	Staff Attorney		12	6.00	\$375.00	\$2,250.00
08/21/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/21/2020	Jed Koslow	Staff Attorney		12	2.75	\$400.00	\$1,100.00
08/21/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/21/2020	Justin Ratliff	Staff Attorney		12	2.00	\$350.00	\$700.00
08/21/2020	Lauren Cormier	Staff Attorney		12	7.00	\$375.00	\$2,625.00
08/21/2020	Monique Hardial	Staff Attorney		12	4.00	\$375.00	\$1,500.00
08/21/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/21/2020	Stephen Imundo	Senior Staff Attorneys		12	7.00	\$425.00	\$2,975.00
08/21/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
08/22/2020	Addison F. Golladay	Staff Attorney		12	6.00	\$400.00	\$2,400.00
08/22/2020	Esinam Quarco	Staff Attorney		12	3.50	\$400.00	\$1,400.00
08/22/2020	Jeremy Robinson	Partner		12	3.25	\$900.00	\$2,925.00
08/23/2020	Addison F. Golladay	Staff Attorney		12	2.50	\$400.00	\$1,000.00
08/23/2020	Colette Foster	Staff Attorney		12	6.00	\$400.00	\$2,400.00
08/23/2020	Igor Faynshteyn	Staff Attorney		12	2.00	\$375.00	\$750.00
08/23/2020	Justin Ratliff	Staff Attorney		12	13.50	\$350.00	\$4,725.00
08/23/2020	Jeremy Robinson	Partner		12	5.25	\$900.00	\$4,725.00
08/24/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
08/24/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/24/2020	Colette Foster	Staff Attorney		12	8.75	\$400.00	\$3,500.00
08/24/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/24/2020	Esinam Quarco	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/24/2020	Ibrahim Hamed	Staff Attorney		12	10.00	\$400.00	\$4,000.00
08/24/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
08/24/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00

08/24/2020	Jed Koslow	Staff Attorney		12	8.25	\$400.00	\$3,300.00
08/24/2020	Johanna Pitcairn	Litigation Support		12	3.00	\$400.00	\$1,200.00
08/24/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/24/2020	Lauren Cormier	Staff Attorney		12	10.00	\$375.00	\$3,750.00
08/24/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/24/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/24/2020	Stephen Imundo	Senior Staff Attorneys		12	8.75	\$425.00	\$3,718.75
08/24/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/24/2020	Jeremy Robinson	Partner		12	5.75	\$900.00	\$5,175.00
08/25/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
08/25/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/25/2020	Colette Foster	Staff Attorney		12	7.75	\$400.00	\$3,100.00
08/25/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/25/2020	Esinam Quarco	Staff Attorney		12	7.75	\$400.00	\$3,100.00
08/25/2020	Helen Fikrey	Staff Attorney		12	9.25	\$400.00	\$3,700.00
08/25/2020	Ibrahim Hamed	Staff Attorney		12	9.50	\$400.00	\$3,800.00
08/25/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/25/2020	Ingvar Olsson	Staff Attorney		12	9.00	\$400.00	\$3,600.00
08/25/2020	Jed Koslow	Staff Attorney		12	11.50	\$400.00	\$4,600.00
08/25/2020	Johanna Pitcairn	Litigation Support		12	1.00	\$400.00	\$400.00
08/25/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/25/2020	Justin Ratliff	Staff Attorney		12	5.00	\$350.00	\$1,750.00
08/25/2020	Lauren Cormier	Staff Attorney		12	10.00	\$375.00	\$3,750.00
08/25/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/25/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/25/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
08/25/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/25/2020	Jeremy Robinson	Partner		12	3.75	\$900.00	\$3,375.00
08/26/2020	Addison F. Golladay	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/26/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/26/2020	Colette Foster	Staff Attorney		12	7.75	\$400.00	\$3,100.00
08/26/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00

08/26/2020	Esinam Quarco	Staff Attorney		12	6.75	\$400.00	\$2,700.00
08/26/2020	Helen Fikrey	Staff Attorney		12	4.25	\$400.00	\$1,700.00
08/26/2020	Helen Fikrey	Staff Attorney		12	4.00	\$400.00	\$1,600.00
08/26/2020	Ibrahim Hamed	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/26/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/26/2020	Ingvar Olsson	Staff Attorney		12	7.00	\$400.00	\$2,800.00
08/26/2020	Jed Koslow	Staff Attorney		12	2.75	\$400.00	\$1,100.00
08/26/2020	Jed Koslow	Staff Attorney		12	9.00	\$400.00	\$3,600.00
08/26/2020	Jose Echegaray	Case Managers		12	0.25	\$350.00	\$87.50
08/26/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/26/2020	Justin Ratliff	Staff Attorney		12	3.50	\$350.00	\$1,225.00
08/26/2020	Justin Ratliff	Staff Attorney		12	0.25	\$350.00	\$87.50
08/26/2020	Lauren Cormier	Staff Attorney		12	10.00	\$375.00	\$3,750.00
08/26/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/26/2020	Ryan Dykhous	Associate		12	1.00	\$425.00	\$425.00
08/26/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/26/2020	Stephen Imundo	Senior Staff Attorneys		12	8.25	\$425.00	\$3,506.25
08/26/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/26/2020	Jeremy Robinson	Partner		12	2.75	\$900.00	\$2,475.00
08/27/2020	Addison F. Golladay	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/27/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
08/27/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
08/27/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/27/2020	Esinam Quarco	Staff Attorney		12	7.00	\$400.00	\$2,800.00
08/27/2020	Helen Fikrey	Staff Attorney		12	11.75	\$400.00	\$4,700.00
08/27/2020	Ibrahim Hamed	Staff Attorney		12	7.50	\$400.00	\$3,000.00
08/27/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
08/27/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/27/2020	Jed Koslow	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/27/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/27/2020	Justin Ratliff	Staff Attorney		12	4.75	\$350.00	\$1,662.50

08/27/2020	Lauren Cormier	Staff Attorney	12	2.50	\$375.00	\$937.50
08/27/2020	Monique Hardial	Staff Attorney	12	8.00	\$375.00	\$3,000.00
08/27/2020	Ryan Dykhous	Associate	12	1.50	\$425.00	\$637.50
08/27/2020	Ryan McCurdy	Staff Attorney	12	8.00	\$400.00	\$3,200.00
08/27/2020	Stephen Imundo	Senior Staff Attorneys	12	7.25	\$425.00	\$3,081.25
08/27/2020	William Pham	Staff Attorney	12	9.00	\$375.00	\$3,375.00
08/27/2020	Jeremy Robinson	Partner	12	4.50	\$900.00	\$4,050.00
08/28/2020	Addison F. Golladay	Staff Attorney	12	5.50	\$400.00	\$2,200.00
08/28/2020	Brian Chau	Senior Staff Attorneys	12	8.00	\$425.00	\$3,400.00
08/28/2020	Colette Foster	Staff Attorney	12	6.75	\$400.00	\$2,700.00
08/28/2020	Erick Ladson	Staff Attorney	12	6.00	\$400.00	\$2,400.00
08/28/2020	Esinam Quarco	Staff Attorney	12	4.50	\$400.00	\$1,800.00
08/28/2020	Igor Faynshteyn	Staff Attorney	12	7.00	\$375.00	\$2,625.00
08/28/2020	Ingvar Olsson	Staff Attorney	12	8.00	\$400.00	\$3,200.00
08/28/2020	Johanna Pitcairn	Litigation Support	12	1.00	\$400.00	\$400.00
08/28/2020	Juan Lossada	Staff Attorney	12	8.00	\$400.00	\$3,200.00
08/28/2020	Justin Ratliff	Staff Attorney	12	3.00	\$350.00	\$1,050.00
08/28/2020	Lauren Cormier	Staff Attorney	12	2.50	\$375.00	\$937.50
08/28/2020	Monique Hardial	Staff Attorney	12	8.00	\$375.00	\$3,000.00
08/28/2020	Ryan McCurdy	Staff Attorney	12	8.00	\$400.00	\$3,200.00
08/28/2020	Stephen Imundo	Senior Staff Attorneys	12	6.50	\$425.00	\$2,762.50
08/28/2020	William Pham	Staff Attorney	12	4.00	\$375.00	\$1,500.00
08/29/2020	Esinam Quarco	Staff Attorney	12	6.00	\$400.00	\$2,400.00
08/29/2020	Helen Fikrey	Staff Attorney	12	3.75	\$400.00	\$1,500.00
08/29/2020	Justin Ratliff	Staff Attorney	12	7.00	\$350.00	\$2,450.00
08/29/2020	Lauren Cormier	Staff Attorney	12	5.00	\$375.00	\$1,875.00
08/29/2020	Jeremy Robinson	Partner	12	1.75	\$900.00	\$1,575.00
08/30/2020	Addison F. Golladay	Staff Attorney	12	2.50	\$400.00	\$1,000.00
08/30/2020	Helen Fikrey	Staff Attorney	12	7.00	\$400.00	\$2,800.00
08/30/2020	Justin Ratliff	Staff Attorney	12	11.00	\$350.00	\$3,850.00

08/31/2020	Addison F. Golladay	Staff Attorney		12	5.50	\$400.00	\$2,200.00
08/31/2020	Brian Chau	Senior Staff Attorneys		12	4.00	\$425.00	\$1,700.00
08/31/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/31/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
08/31/2020	Esinam Quarco	Staff Attorney		12	7.00	\$400.00	\$2,800.00
08/31/2020	Helen Fikrey	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/31/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/31/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/31/2020	Jed Koslow	Staff Attorney		12	11.25	\$400.00	\$4,500.00
08/31/2020	Johanna Pitcairn	Litigation Support		12	2.00	\$400.00	\$800.00
08/31/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/31/2020	Justin Ratliff	Staff Attorney		12	6.00	\$350.00	\$2,100.00
08/31/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
08/31/2020	Monique Hardial	Staff Attorney		12	8.50	\$375.00	\$3,187.50
08/31/2020	Ryan McCurdy	Staff Attorney		12	8.00	\$400.00	\$3,200.00
08/31/2020	William Pham	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/01/2020	Addison F. Golladay	Staff Attorney		12	9.00	\$400.00	\$3,600.00
09/01/2020	Colette Foster	Staff Attorney		12	8.25	\$400.00	\$3,300.00
09/01/2020	Esinam Quarco	Staff Attorney		12	9.00	\$400.00	\$3,600.00
09/01/2020	Helen Fikrey	Staff Attorney		12	4.00	\$400.00	\$1,600.00
09/01/2020	Brian Chau	Senior Staff Attorneys		12	4.00	\$425.00	\$1,700.00
09/01/2020	Igor Faynshteyn	Staff Attorney		12	7.00	\$375.00	\$2,625.00
09/01/2020	Ingvar Olsson	Staff Attorney		12	9.00	\$400.00	\$3,600.00
09/01/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/01/2020	Justin Ratliff	Staff Attorney		12	6.00	\$350.00	\$2,100.00
09/01/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/01/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/01/2020	Ryan McCurdy	Staff Attorney		12	4.50	\$400.00	\$1,800.00
09/01/2020	Stephen Imundo	Senior Staff Attorneys		12	1.75	\$425.00	\$743.75
09/01/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
09/01/2020	Jed Koslow	Staff Attorney		12	9.25	\$400.00	\$3,700.00

09/01/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
09/01/2020	Jeremy Robinson	Partner		12	5.50	\$900.00	\$4,950.00
09/02/2020	Addison F. Golladay	Staff Attorney		12	11.50	\$400.00	\$4,600.00
09/02/2020	Esinam Quarco	Staff Attorney		12	10.00	\$400.00	\$4,000.00
09/02/2020	Igor Faynshteyn	Staff Attorney		12	10.50	\$375.00	\$3,937.50
09/02/2020	Ingvar Olsson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
09/02/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/02/2020	Justin Ratliff	Staff Attorney		12	5.25	\$350.00	\$1,837.50
09/02/2020	Lauren Cormier	Staff Attorney		12	10.00	\$375.00	\$3,750.00
09/02/2020	Monique Hardial	Staff Attorney		12	10.00	\$375.00	\$3,750.00
09/02/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/02/2020	Jed Koslow	Staff Attorney		12	11.00	\$400.00	\$4,400.00
09/02/2020	Jeremy Robinson	Partner		12	2.50	\$900.00	\$2,250.00
09/03/2020	Addison F. Golladay	Staff Attorney		12	9.00	\$400.00	\$3,600.00
09/03/2020	Colette Foster	Staff Attorney		12	8.25	\$400.00	\$3,300.00
09/03/2020	Esinam Quarco	Staff Attorney		12	7.00	\$400.00	\$2,800.00
09/03/2020	Jed Koslow	Staff Attorney		12	4.25	\$400.00	\$1,700.00
09/03/2020	Johanna Pitcairn	Litigation Support		12	2.00	\$400.00	\$800.00
09/03/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/03/2020	Justin Ratliff	Staff Attorney		12	6.50	\$350.00	\$2,275.00
09/03/2020	Lauren Cormier	Staff Attorney		12	10.00	\$375.00	\$3,750.00
09/03/2020	Monique Hardial	Staff Attorney		12	4.00	\$375.00	\$1,500.00
09/03/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/04/2020	Addison F. Golladay	Staff Attorney		12	5.00	\$400.00	\$2,000.00
09/04/2020	Colette Foster	Staff Attorney		12	7.50	\$400.00	\$3,000.00
09/04/2020	Esinam Quarco	Staff Attorney		12	7.00	\$400.00	\$2,800.00

09/04/2020	Helen Fikrey	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/04/2020	Igor Faynshteyn	Staff Attorney		12	6.50	\$375.00	\$2,437.50
09/04/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/04/2020	Justin Ratliff	Staff Attorney		12	8.00	\$350.00	\$2,800.00
09/04/2020	Lauren Cormier	Staff Attorney		12	3.00	\$375.00	\$1,125.00
09/04/2020	Stephen Imundo	Senior Staff Attorneys		12	3.50	\$425.00	\$1,487.50
09/04/2020	Jed Koslow	Staff Attorney		12	4.25	\$400.00	\$1,700.00
09/04/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
09/04/2020	Jeremy Robinson	Partner		12	3.25	\$900.00	\$2,925.00
09/05/2020	Igor Faynshteyn	Staff Attorney		12	6.50	\$375.00	\$2,437.50
09/05/2020	Lauren Cormier	Staff Attorney		12	1.00	\$375.00	\$375.00
09/06/2020	Justin Ratliff	Staff Attorney		12	2.00	\$350.00	\$700.00
09/06/2020	Jeremy Robinson	Partner		12	4.50	\$900.00	\$4,050.00
09/07/2020	Juan Lossada	Staff Attorney		12	2.00	\$400.00	\$800.00
09/07/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
09/07/2020	Jeremy Robinson	Partner		12	5.50	\$900.00	\$4,950.00
09/08/2020	Erick Ladson	Staff Attorney		12	6.00	\$400.00	\$2,400.00
09/08/2020	Addison F. Golladay	Staff Attorney		12	10.00	\$400.00	\$4,000.00
09/08/2020	Colette Foster	Staff Attorney		12	10.75	\$400.00	\$4,300.00
09/08/2020	Esinam Quarco	Staff Attorney		12	10.50	\$400.00	\$4,200.00
09/08/2020	Helen Fikrey	Staff Attorney		12	10.25	\$400.00	\$4,100.00
09/08/2020	Ibrahim Hamed	Staff Attorney		12	11.00	\$400.00	\$4,400.00
09/08/2020	Igor Faynshteyn	Staff Attorney		12	2.50	\$375.00	\$937.50
09/08/2020	Igor Faynshteyn	Staff Attorney		12	6.50	\$375.00	\$2,437.50
09/08/2020	Ingvar Olsson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
09/08/2020	Jed Koslow	Staff Attorney		12	3.50	\$400.00	\$1,400.00
09/08/2020	Johanna Pitcairn	Litigation Support		12	0.50	\$400.00	\$200.00
09/08/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/08/2020	Justin Ratliff	Staff Attorney		12	8.00	\$350.00	\$2,800.00
09/08/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/08/2020	Monique Hardial	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/08/2020	Stephen Imundo	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00

09/08/2020	Stephen Imundo	Senior Staff Attorneys		12	3.00	\$425.00	\$1,275.00
09/08/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
09/08/2020	Jed Koslow	Staff Attorney		12	8.75	\$400.00	\$3,500.00
09/09/2020	Erick Ladson	Staff Attorney		12	4.50	\$400.00	\$1,800.00
09/09/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
09/09/2020	Colette Foster	Staff Attorney		12	6.00	\$400.00	\$2,400.00
09/09/2020	Esinam Quarco	Staff Attorney		12	6.50	\$400.00	\$2,600.00
09/09/2020	Helen Fikrey	Staff Attorney		12	10.00	\$400.00	\$4,000.00
09/09/2020	Ibrahim Hamed	Staff Attorney		12	11.00	\$400.00	\$4,400.00
09/09/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/09/2020	Ingvar Olsson	Staff Attorney		12	9.25	\$400.00	\$3,700.00
09/09/2020	Jed Koslow	Staff Attorney		12	3.00	\$400.00	\$1,200.00
09/09/2020	Jed Koslow	Staff Attorney		12	4.25	\$400.00	\$1,700.00
09/09/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/09/2020	Justin Ratliff	Staff Attorney		12	6.50	\$350.00	\$2,275.00
09/09/2020	Lauren Cormier	Staff Attorney		12	4.00	\$375.00	\$1,500.00
09/09/2020	Monique Hardial	Staff Attorney		12	11.00	\$375.00	\$4,125.00
09/09/2020	Stephen Imundo	Senior Staff Attorneys		12	7.50	\$425.00	\$3,187.50
09/09/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
09/09/2020	Jed Koslow	Staff Attorney		12	4.25	\$400.00	\$1,700.00
09/10/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
09/10/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/10/2020	Brian Chau	Senior Staff Attorneys		12	4.00	\$425.00	\$1,700.00
09/10/2020	Esinam Quarco	Staff Attorney		12	7.00	\$400.00	\$2,800.00
09/10/2020	Helen Fikrey	Staff Attorney		12	7.50	\$400.00	\$3,000.00
09/10/2020	Ibrahim Hamed	Staff Attorney		12	10.50	\$400.00	\$4,200.00
09/10/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/10/2020	Jed Koslow	Staff Attorney		12	11.00	\$400.00	\$4,400.00
09/10/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/10/2020	Justin Ratliff	Staff Attorney		12	6.50	\$350.00	\$2,275.00
09/10/2020	Lauren Cormier	Staff Attorney		12	4.00	\$375.00	\$1,500.00

09/10/2020	Monique Hardial	Staff Attorney		12	5.00	\$375.00	\$1,875.00
09/10/2020	William Pham	Staff Attorney		12	10.00	\$375.00	\$3,750.00
09/10/2020	Jeremy Robinson	Partner		12	2.75	\$900.00	\$2,475.00
09/11/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
09/11/2020	Brian Chau	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
09/11/2020	Colette Foster	Staff Attorney		12	7.25	\$400.00	\$2,900.00
09/11/2020	Esinam Quarco	Staff Attorney		12	7.75	\$400.00	\$3,100.00
09/11/2020	Helen Fikrey	Staff Attorney		12	8.25	\$400.00	\$3,300.00
09/11/2020	Ibrahim Hamed	Staff Attorney		12	7.50	\$400.00	\$3,000.00
09/11/2020	Igor Faynshteyn	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/11/2020	Ingvar Olsson	Staff Attorney		12	9.50	\$400.00	\$3,800.00
09/11/2020	Jed Koslow	Staff Attorney		12	5.25	\$400.00	\$2,100.00
09/11/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/11/2020	Justin Ratliff	Staff Attorney		12	6.00	\$350.00	\$2,100.00
09/11/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/11/2020	Stephen Imundo	Senior Staff Attorneys		12	2.75	\$425.00	\$1,168.75
09/11/2020	Stephen Imundo	Senior Staff Attorneys		12	6.50	\$425.00	\$2,762.50
09/11/2020	William Pham	Staff Attorney		12	6.00	\$375.00	\$2,250.00
09/11/2020	Jeremy Robinson	Partner		12	9.50	\$900.00	\$8,550.00
09/12/2020	Addison F. Golladay	Staff Attorney		12	4.00	\$400.00	\$1,600.00
09/12/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/12/2020	Helen Fikrey	Staff Attorney		12	2.25	\$400.00	\$900.00
09/12/2020	Juan Lossada	Staff Attorney		12	6.00	\$400.00	\$2,400.00
09/12/2020	Lauren Cormier	Staff Attorney		12	4.00	\$375.00	\$1,500.00
09/13/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
09/13/2020	Esinam Quarco	Staff Attorney		12	8.25	\$400.00	\$3,300.00
09/13/2020	Helen Fikrey	Staff Attorney		12	1.75	\$400.00	\$700.00
09/13/2020	Igor Faynshteyn	Staff Attorney		12	5.00	\$375.00	\$1,875.00
09/13/2020	Justin Ratliff	Staff Attorney		12	5.00	\$350.00	\$1,750.00
09/13/2020	Lauren Cormier	Staff Attorney		12	4.00	\$375.00	\$1,500.00
09/14/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00

09/14/2020	Colette Foster	Staff Attorney		12	7.50	\$400.00	\$3,000.00
09/14/2020	Esinam Quarco	Staff Attorney		12	5.50	\$400.00	\$2,200.00
09/14/2020	Helen Fikrey	Staff Attorney		12	10.50	\$400.00	\$4,200.00
09/14/2020	Igor Faynshteyn	Staff Attorney		12	7.50	\$375.00	\$2,812.50
09/14/2020	Jed Koslow	Staff Attorney		12	10.25	\$400.00	\$4,100.00
09/14/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/14/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/14/2020	Stephen Imundo	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
09/14/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/15/2020	Addison F. Golladay	Staff Attorney		12	9.00	\$400.00	\$3,600.00
09/15/2020	Colette Foster	Staff Attorney		12	7.75	\$400.00	\$3,100.00
09/15/2020	Esinam Quarco	Staff Attorney		12	7.50	\$400.00	\$3,000.00
09/15/2020	Helen Fikrey	Staff Attorney		12	9.00	\$400.00	\$3,600.00
09/15/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/15/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/15/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/15/2020	Stephen Imundo	Senior Staff Attorneys		12	9.75	\$425.00	\$4,143.75
09/15/2020	Jed Koslow	Staff Attorney		12	8.75	\$400.00	\$3,500.00
09/15/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/16/2020	Addison F. Golladay	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/16/2020	Brian Chau	Senior Staff Attorneys		12	1.00	\$425.00	\$425.00
09/16/2020	Ibrahim Hamed	Staff Attorney		12	1.00	\$400.00	\$400.00
09/16/2020	Colette Foster	Staff Attorney		12	8.25	\$400.00	\$3,300.00
09/16/2020	Esinam Quarco	Staff Attorney		12	8.50	\$400.00	\$3,400.00
09/16/2020	Helen Fikrey	Staff Attorney		12	8.25	\$400.00	\$3,300.00
09/16/2020	Igor Faynshteyn	Staff Attorney		12	10.50	\$375.00	\$3,937.50
09/16/2020	Ingvar Olsson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
09/16/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/16/2020	Justin Ratliff	Staff Attorney		12	0.25	\$350.00	\$87.50
09/16/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/16/2020	Stephen Imundo	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00

09/16/2020	Jed Koslow	Staff Attorney		12	2.75	\$400.00	\$1,100.00
09/16/2020	Jed Koslow	Staff Attorney		12	5.50	\$400.00	\$2,200.00
09/16/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/17/2020	Addison F. Golladay	Staff Attorney		12	8.50	\$400.00	\$3,400.00
09/17/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
09/17/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
09/17/2020	Esinam Quarco	Staff Attorney		12	6.00	\$400.00	\$2,400.00
09/17/2020	Helen Fikrey	Staff Attorney		12	9.00	\$400.00	\$3,600.00
09/17/2020	Jed Koslow	Staff Attorney		12	7.50	\$400.00	\$3,000.00
09/17/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/17/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/17/2020	Monique Hardial	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/17/2020	Stephen Imundo	Senior Staff Attorneys		12	7.00	\$425.00	\$2,975.00
09/17/2020	Stephen Imundo	Senior Staff Attorneys		12	4.25	\$425.00	\$1,806.25
09/17/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/18/2020	Addison F. Golladay	Staff Attorney		12	3.00	\$400.00	\$1,200.00
09/18/2020	Colette Foster	Staff Attorney		12	7.50	\$400.00	\$3,000.00
09/18/2020	Erick Ladson	Staff Attorney		12	6.00	\$400.00	\$2,400.00
09/18/2020	Esinam Quarco	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/18/2020	Helen Fikrey	Staff Attorney		12	3.25	\$400.00	\$1,300.00
09/18/2020	Jed Koslow	Staff Attorney		12	5.25	\$400.00	\$2,100.00
09/18/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/18/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/18/2020	Monique Hardial	Staff Attorney		12	7.00	\$375.00	\$2,625.00
09/18/2020	Stephen Imundo	Senior Staff Attorneys		12	3.00	\$425.00	\$1,275.00
09/18/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
09/18/2020	Jeremy Robinson	Partner		12	3.50	\$900.00	\$3,150.00
09/19/2020	Esinam Quarco	Staff Attorney		12	4.50	\$400.00	\$1,800.00

09/19/2020	Johanna Pitcairn	Litigation Support		12	2.00	\$400.00	\$800.00
09/20/2020	Addison F. Golladay	Staff Attorney		12	4.00	\$400.00	\$1,600.00
09/21/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
09/21/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
09/21/2020	Erick Ladson	Staff Attorney		12	9.50	\$400.00	\$3,800.00
09/21/2020	Esinam Quarco	Staff Attorney		12	9.00	\$400.00	\$3,600.00
09/21/2020	Helen Fikrey	Staff Attorney		12	3.75	\$400.00	\$1,500.00
09/21/2020	Jed Koslow	Staff Attorney		12	9.75	\$400.00	\$3,900.00
09/21/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/21/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/21/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/21/2020	Stephen Imundo	Senior Staff Attorneys		12	9.50	\$425.00	\$4,037.50
09/21/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/22/2020	Addison F. Golladay	Staff Attorney		12	7.50	\$400.00	\$3,000.00
09/22/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
09/22/2020	Erick Ladson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
09/22/2020	Esinam Quarco	Staff Attorney		12	9.00	\$400.00	\$3,600.00
09/22/2020	Helen Fikrey	Staff Attorney		12	5.25	\$400.00	\$2,100.00
09/22/2020	Jed Koslow	Staff Attorney		12	11.00	\$400.00	\$4,400.00
09/22/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/22/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/22/2020	Monique Hardial	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/22/2020	Stephen Imundo	Senior Staff Attorneys		12	2.00	\$425.00	\$850.00
09/22/2020	Stephen Imundo	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
09/22/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/23/2020	Colette Foster	Staff Attorney		12	8.25	\$400.00	\$3,300.00
09/23/2020	Helen Fikrey	Staff Attorney		12	5.50	\$400.00	\$2,200.00
09/23/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00

09/23/2020	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
09/23/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/23/2020	Jed Koslow	Staff Attorney		12	8.25	\$400.00	\$3,300.00
09/24/2020	Colette Foster	Staff Attorney		12	8.25	\$400.00	\$3,300.00
09/24/2020	Esinam Quarco	Staff Attorney		12	8.50	\$400.00	\$3,400.00
09/24/2020	Helen Fikrey	Staff Attorney		12	4.50	\$400.00	\$1,800.00
09/24/2020	Ingvar Olsson	Staff Attorney		12	6.75	\$400.00	\$2,700.00
09/24/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/24/2020	Stephen Imundo	Senior Staff Attorneys		12	8.25	\$425.00	\$3,506.25
09/24/2020	William Pham	Staff Attorney		12	9.00	\$375.00	\$3,375.00
09/24/2020	Jed Koslow	Staff Attorney		12	5.75	\$400.00	\$2,300.00
09/25/2020	Colette Foster	Staff Attorney		12	6.50	\$400.00	\$2,600.00
09/25/2020	Helen Fikrey	Staff Attorney		12	11.25	\$400.00	\$4,500.00
09/25/2020	Ingvar Olsson	Staff Attorney		12	5.50	\$400.00	\$2,200.00
09/25/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/25/2020	William Pham	Staff Attorney		12	4.00	\$375.00	\$1,500.00
09/25/2020	Jed Koslow	Staff Attorney		12	5.25	\$400.00	\$2,100.00
09/26/2020	Helen Fikrey	Staff Attorney		12	9.75	\$400.00	\$3,900.00
09/27/2020	Ingvar Olsson	Staff Attorney		12	4.00	\$400.00	\$1,600.00
09/28/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/28/2020	Helen Fikrey	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/28/2020	Ingvar Olsson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
09/28/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/28/2020	Jed Koslow	Staff Attorney		12	3.00	\$400.00	\$1,200.00
09/29/2020	Jed Koslow	Staff Attorney		12	2.50	\$400.00	\$1,000.00
09/29/2020	Colette Foster	Staff Attorney		12	6.75	\$400.00	\$2,700.00
09/29/2020	Helen Fikrey	Staff Attorney		12	10.50	\$400.00	\$4,200.00
09/29/2020	Ingvar Olsson	Staff Attorney		12	6.00	\$400.00	\$2,400.00
09/29/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
09/29/2020	Stephen Imundo	Senior Staff Attorneys		12	8.50	\$425.00	\$3,612.50

09/30/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
09/30/2020	Ingvar Olsson	Staff Attorney		12	8.50	\$400.00	\$3,400.00
09/30/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/01/2020	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
10/01/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/01/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
10/01/2020	Jeremy Robinson	Partner		12	3.50	\$900.00	\$3,150.00
10/02/2020	Helen Fikrey	Staff Attorney		12	5.50	\$400.00	\$2,200.00
10/02/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/02/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/02/2020	Jeremy Robinson	Partner		12	1.50	\$900.00	\$1,350.00
10/03/2020	Ingvar Olsson	Staff Attorney		12	4.50	\$400.00	\$1,800.00
10/04/2020	Colette Foster	Staff Attorney		12	6.25	\$400.00	\$2,500.00
10/04/2020	Ingvar Olsson	Staff Attorney		12	4.50	\$400.00	\$1,800.00
10/05/2020	Colette Foster	Staff Attorney		12	9.50	\$400.00	\$3,800.00
10/05/2020	Helen Fikrey	Staff Attorney		12	7.75	\$400.00	\$3,100.00
10/05/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/05/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/05/2020	Jeremy Robinson	Partner		12	2.50	\$900.00	\$2,250.00
10/06/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
10/06/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/06/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/07/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
10/07/2020	Helen Fikrey	Staff Attorney		12	4.50	\$400.00	\$1,800.00
10/07/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/07/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/07/2020	Richard Gluck	Senior Counsel		12	0.75	\$800.00	\$600.00
10/07/2020	Stephen Imundo	Senior Staff Attorneys		12	2.00	\$425.00	\$850.00
10/07/2020	Ibrahim Hamed	Staff Attorney		12	1.00	\$400.00	\$400.00
10/08/2020	Colette Foster	Staff Attorney		12	9.50	\$400.00	\$3,800.00
10/08/2020	Esinam Quarco	Staff Attorney		12	5.00	\$400.00	\$2,000.00
10/08/2020	Helen Fikrey	Staff Attorney		12	9.75	\$400.00	\$3,900.00
10/08/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/08/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/09/2020	Esinam Quarco	Staff Attorney		12	7.50	\$400.00	\$3,000.00

10/09/2020	Helen Fikrey	Staff Attorney		12	9.00	\$400.00	\$3,600.00
10/09/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/09/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/09/2020	Richard Gluck	Senior Counsel		12	2.75	\$800.00	\$2,200.00
10/11/2020	Colette Foster	Staff Attorney		12	4.00	\$400.00	\$1,600.00
10/12/2020	Colette Foster	Staff Attorney		12	9.50	\$400.00	\$3,800.00
10/12/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/12/2020	Stephen Imundo	Senior Staff Attorneys		12	7.75	\$425.00	\$3,293.75
10/13/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/13/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/13/2020	Rebecca Boon	Partner		12	0.75	\$875.00	\$656.25
10/14/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
10/14/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/15/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/15/2020	Juan Lossada	Staff Attorney		12	12.00	\$400.00	\$4,800.00
10/15/2020	Justin Ratliff	Staff Attorney		12	1.00	\$350.00	\$350.00
10/16/2020	Colette Foster	Staff Attorney		12	11.00	\$400.00	\$4,400.00
10/16/2020	Helen Fikrey	Staff Attorney		12	6.25	\$400.00	\$2,500.00
10/16/2020	Ingvar Olsson	Staff Attorney		12	9.00	\$400.00	\$3,600.00
10/16/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
10/16/2020	Stephen Imundo	Senior Staff Attorneys		12	3.00	\$425.00	\$1,275.00
10/17/2020	Juan Lossada	Staff Attorney		12	4.00	\$400.00	\$1,600.00
10/17/2020	Jeremy Robinson	Partner		12	2.50	\$900.00	\$2,250.00
10/18/2020	Colette Foster	Staff Attorney		12	7.00	\$400.00	\$2,800.00
10/18/2020	Juan Lossada	Staff Attorney		12	6.00	\$400.00	\$2,400.00
10/19/2020	Addison F. Golladay	Staff Attorney		12	12.50	\$400.00	\$5,000.00
10/19/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
10/19/2020	Helen Fikrey	Staff Attorney		12	9.75	\$400.00	\$3,900.00
10/19/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
10/20/2020	Addison F. Golladay	Staff Attorney		12	9.00	\$400.00	\$3,600.00
10/20/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
10/20/2020	Helen Fikrey	Staff Attorney		12	7.50	\$400.00	\$3,000.00
10/20/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
10/21/2020	Colette Foster	Staff Attorney		12	9.50	\$400.00	\$3,800.00

10/21/2020	Helen Fikrey	Staff Attorney		12	6.25	\$400.00	\$2,500.00
10/21/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
10/22/2020	Colette Foster	Staff Attorney		12	9.50	\$400.00	\$3,800.00
10/22/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
10/22/2020	Stephen Imundo	Senior Staff Attorneys		12	10.25	\$425.00	\$4,356.25
10/23/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
10/23/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
10/24/2020	Colette Foster	Staff Attorney		12	5.50	\$400.00	\$2,200.00
10/24/2020	Juan Lossada	Staff Attorney		12	6.00	\$400.00	\$2,400.00
10/25/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
10/25/2020	Juan Lossada	Staff Attorney		12	4.00	\$400.00	\$1,600.00
10/26/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
10/27/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
10/27/2020	Jeremy Robinson	Partner		12	2.50	\$900.00	\$2,250.00
10/28/2020	Ingvar Olsson	Staff Attorney		12	7.00	\$400.00	\$2,800.00
10/28/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
10/28/2020	Jeremy Robinson	Partner		12	3.50	\$900.00	\$3,150.00
10/29/2020	Ingvar Olsson	Staff Attorney		12	7.00	\$400.00	\$2,800.00
10/29/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
10/29/2020	Stephen Imundo	Senior Staff Attorneys		12	2.50	\$425.00	\$1,062.50
10/29/2020	Jeremy Robinson	Partner		12	3.50	\$900.00	\$3,150.00
10/30/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
10/30/2020	Jeremy Robinson	Partner		12	3.50	\$900.00	\$3,150.00
10/31/2020	Juan Lossada	Staff Attorney		12	6.00	\$400.00	\$2,400.00
11/01/2020	Juan Lossada	Staff Attorney		12	6.00	\$400.00	\$2,400.00
11/01/2020	Stephen Imundo	Senior Staff Attorneys		12	8.75	\$425.00	\$3,718.75
11/02/2020	Colette Foster	Staff Attorney		12	11.25	\$400.00	\$4,500.00
11/02/2020	Helen Fikrey	Staff Attorney		12	8.25	\$400.00	\$3,300.00
11/02/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
11/02/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
11/03/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
11/03/2020	Helen Fikrey	Staff Attorney		12	8.25	\$400.00	\$3,300.00
11/03/2020	Ingvar Olsson	Staff Attorney		12	5.25	\$400.00	\$2,100.00
11/03/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
11/04/2020	Colette Foster	Staff Attorney		12	9.25	\$400.00	\$3,700.00
11/04/2020	Helen Fikrey	Staff Attorney		12	7.50	\$400.00	\$3,000.00
11/04/2020	Ingvar Olsson	Staff Attorney		12	4.50	\$400.00	\$1,800.00
11/04/2020	Juan Lossada	Staff Attorney		12	7.25	\$400.00	\$2,900.00

11/04/2020	Lawrence Hosmer	Senior Staff Attorneys		12	3.00	\$425.00	\$1,275.00
11/04/2020	Jeremy Robinson	Partner		12	4.50	\$900.00	\$4,050.00
11/05/2020	Colette Foster	Staff Attorney		12	8.25	\$400.00	\$3,300.00
11/05/2020	Helen Fikrey	Staff Attorney		12	4.00	\$400.00	\$1,600.00
11/05/2020	Ingvar Olsson	Staff Attorney		12	6.00	\$400.00	\$2,400.00
11/05/2020	Juan Lossada	Staff Attorney		12	12.00	\$400.00	\$4,800.00
11/05/2020	Lawrence Hosmer	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
11/06/2020	Colette Foster	Staff Attorney		12	12.00	\$400.00	\$4,800.00
11/06/2020	Helen Fikrey	Staff Attorney		12	5.00	\$400.00	\$2,000.00
11/06/2020	Ingvar Olsson	Staff Attorney		12	7.00	\$400.00	\$2,800.00
11/06/2020	Juan Lossada	Staff Attorney		12	9.00	\$400.00	\$3,600.00
11/06/2020	Lawrence Hosmer	Senior Staff Attorneys		12	5.75	\$425.00	\$2,443.75
11/07/2020	Colette Foster	Staff Attorney		12	3.00	\$400.00	\$1,200.00
11/07/2020	Helen Fikrey	Staff Attorney		12	3.50	\$400.00	\$1,400.00
11/07/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
11/07/2020	Stephen Imundo	Senior Staff Attorneys		12	3.50	\$425.00	\$1,487.50
11/08/2020	Colette Foster	Staff Attorney		12	7.00	\$400.00	\$2,800.00
11/08/2020	Helen Fikrey	Staff Attorney		12	2.75	\$400.00	\$1,100.00
11/08/2020	Juan Lossada	Staff Attorney		12	7.00	\$400.00	\$2,800.00
11/08/2020	Stephen Imundo	Senior Staff Attorneys		12	3.00	\$425.00	\$1,275.00
11/09/2020	Colette Foster	Staff Attorney		12	11.50	\$400.00	\$4,600.00
11/09/2020	Ingvar Olsson	Staff Attorney		12	10.00	\$400.00	\$4,000.00
11/09/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
11/09/2020	Lawrence Hosmer	Senior Staff Attorneys		12	8.25	\$425.00	\$3,506.25
11/10/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
11/10/2020	Ingvar Olsson	Staff Attorney		12	10.75	\$400.00	\$4,300.00
11/10/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
11/10/2020	Lawrence Hosmer	Senior Staff Attorneys		12	8.25	\$425.00	\$3,506.25
11/10/2020	Ryan Candee	Senior Staff Attorneys		12	8.50	\$425.00	\$3,612.50
11/11/2020	Andrew Boruch	Senior Staff Attorneys		12	3.50	\$425.00	\$1,487.50
11/11/2020	Andrew Boruch	Senior Staff Attorneys		12	4.75	\$425.00	\$2,018.75
11/11/2020	Colette Foster	Staff Attorney		12	6.50	\$400.00	\$2,600.00

11/11/2020	Daniel Renehan	Staff Attorney	12	10.00	\$400.00	\$4,000.00
11/11/2020	Ingvar Olsson	Staff Attorney	12	9.50	\$400.00	\$3,800.00
11/11/2020	Juan Lossada	Staff Attorney	12	10.50	\$400.00	\$4,200.00
11/11/2020	Lawrence Hosmer	Senior Staff Attorneys	12	8.00	\$425.00	\$3,400.00
11/11/2020	Ryan Candee	Senior Staff Attorneys	12	7.75	\$425.00	\$3,293.75
11/12/2020	Andrew Boruch	Senior Staff Attorneys	12	4.00	\$425.00	\$1,700.00
11/12/2020	Andrew Boruch	Senior Staff Attorneys	12	4.25	\$425.00	\$1,806.25
11/12/2020	Colette Foster	Staff Attorney	12	6.00	\$400.00	\$2,400.00
11/12/2020	Daniel Renehan	Staff Attorney	12	7.50	\$400.00	\$3,000.00
11/12/2020	Juan Lossada	Staff Attorney	12	10.50	\$400.00	\$4,200.00
11/12/2020	Lawrence Hosmer	Senior Staff Attorneys	12	8.00	\$425.00	\$3,400.00
11/12/2020	Ryan Candee	Senior Staff Attorneys	12	7.75	\$425.00	\$3,293.75
11/13/2020	Andrew Boruch	Senior Staff Attorneys	12	3.75	\$425.00	\$1,593.75
11/13/2020	Andrew Boruch	Senior Staff Attorneys	12	2.75	\$425.00	\$1,168.75
11/13/2020	Colette Foster	Staff Attorney	12	6.50	\$400.00	\$2,600.00
11/13/2020	Daniel Renehan	Staff Attorney	12	4.50	\$400.00	\$1,800.00
11/13/2020	Juan Lossada	Staff Attorney	12	8.00	\$400.00	\$3,200.00
11/13/2020	Lawrence Hosmer	Senior Staff Attorneys	12	7.50	\$425.00	\$3,187.50
11/13/2020	Ryan Candee	Senior Staff Attorneys	12	7.25	\$425.00	\$3,081.25
11/14/2020	Colette Foster	Staff Attorney	12	6.50	\$400.00	\$2,600.00
11/14/2020	Juan Lossada	Staff Attorney	12	4.00	\$400.00	\$1,600.00
11/15/2020	Colette Foster	Staff Attorney	12	9.00	\$400.00	\$3,600.00
11/15/2020	Juan Lossada	Staff Attorney	12	2.00	\$400.00	\$800.00
11/16/2020	Colette Foster	Staff Attorney	12	14.00	\$400.00	\$5,600.00
11/16/2020	Juan Lossada	Staff Attorney	12	10.00	\$400.00	\$4,000.00
11/16/2020	Lawrence Hosmer	Senior Staff Attorneys	12	9.00	\$425.00	\$3,825.00
11/17/2020	Colette Foster	Staff Attorney	12	13.00	\$400.00	\$5,200.00
11/17/2020	Juan Lossada	Staff Attorney	12	11.50	\$400.00	\$4,600.00
11/17/2020	Lawrence Hosmer	Senior Staff Attorneys	12	9.25	\$425.00	\$3,931.25
11/17/2020	Richard Gluck	Senior Counsel	12	0.75	\$800.00	\$600.00
11/18/2020	Colette Foster	Staff Attorney	12	13.00	\$400.00	\$5,200.00
11/18/2020	Juan Lossada	Staff Attorney	12	10.00	\$400.00	\$4,000.00
11/18/2020	Lawrence Hosmer	Senior Staff Attorneys	12	8.75	\$425.00	\$3,718.75
11/19/2020	Colette Foster	Staff Attorney	12	6.50	\$400.00	\$2,600.00
11/19/2020	Erick Ladson	Staff Attorney	12	3.75	\$400.00	\$1,500.00
11/19/2020	Ingvar Olsson	Staff Attorney	12	7.75	\$400.00	\$3,100.00
11/19/2020	Jed Koslow	Staff Attorney	12	3.75	\$400.00	\$1,500.00
11/19/2020	Juan Lossada	Staff Attorney	12	8.50	\$400.00	\$3,400.00
11/19/2020	Lawrence Hosmer	Senior Staff Attorneys	12	7.75	\$425.00	\$3,293.75
11/19/2020	Stephen Imundo	Senior Staff Attorneys	12	3.50	\$425.00	\$1,487.50
11/20/2020	Juan Lossada	Staff Attorney	12	3.50	\$400.00	\$1,400.00

11/20/2020	Justin Ratliff	Staff Attorney		12	0.25	\$350.00	\$87.50
11/20/2020	Lawrence Hosmer	Senior Staff Attorneys		12	5.25	\$425.00	\$2,231.25
11/20/2020	Richard Gluck	Senior Counsel		12	1.50	\$800.00	\$1,200.00
11/20/2020	Jed Koslow	Staff Attorney		12	2.25	\$400.00	\$900.00
11/20/2020	Stephen Imundo	Senior Staff Attorneys		12	0.50	\$425.00	\$212.50
11/21/2020	Juan Lossada	Staff Attorney		12	5.00	\$400.00	\$2,000.00
11/22/2020	Juan Lossada	Staff Attorney		12	1.00	\$400.00	\$400.00
11/23/2020	Colette Foster	Staff Attorney		12	10.25	\$400.00	\$4,100.00
11/23/2020	Helen Fikrey	Staff Attorney		12	10.50	\$400.00	\$4,200.00
11/23/2020	Ingvar Olsson	Staff Attorney		12	9.50	\$400.00	\$3,800.00
11/23/2020	Jed Koslow	Staff Attorney		12	10.50	\$400.00	\$4,200.00
11/23/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
11/23/2020	Lawrence Hosmer	Senior Staff Attorneys		12	6.00	\$425.00	\$2,550.00
11/24/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
11/24/2020	Helen Fikrey	Staff Attorney		12	12.25	\$400.00	\$4,900.00
11/24/2020	Ingvar Olsson	Staff Attorney		12	10.75	\$400.00	\$4,300.00
11/24/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
11/24/2020	Lawrence Hosmer	Senior Staff Attorneys		12	9.25	\$425.00	\$3,931.25
11/25/2020	Colette Foster	Staff Attorney		12	7.50	\$400.00	\$3,000.00
11/25/2020	Helen Fikrey	Staff Attorney		12	12.50	\$400.00	\$5,000.00
11/25/2020	Ingvar Olsson	Staff Attorney		12	10.25	\$400.00	\$4,100.00
11/25/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
11/25/2020	Lawrence Hosmer	Senior Staff Attorneys		12	10.00	\$425.00	\$4,250.00
11/28/2020	Colette Foster	Staff Attorney		12	6.25	\$400.00	\$2,500.00
11/28/2020	Ingvar Olsson	Staff Attorney		12	4.50	\$400.00	\$1,800.00
11/28/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
11/28/2020	Lawrence Hosmer	Senior Staff Attorneys		12	4.75	\$425.00	\$2,018.75
11/29/2020	Colette Foster	Staff Attorney		12	7.50	\$400.00	\$3,000.00
11/29/2020	Helen Fikrey	Staff Attorney		12	4.75	\$400.00	\$1,900.00
11/29/2020	Ingvar Olsson	Staff Attorney		12	5.00	\$400.00	\$2,000.00
11/29/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
11/29/2020	Lawrence Hosmer	Senior Staff Attorneys		12	4.00	\$425.00	\$1,700.00
11/30/2020	Colette Foster	Staff Attorney		12	7.50	\$400.00	\$3,000.00
11/30/2020	Helen Fikrey	Staff Attorney		12	6.50	\$400.00	\$2,600.00
11/30/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
11/30/2020	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
11/30/2020	Lawrence Hosmer	Senior Staff Attorneys		12	6.75	\$425.00	\$2,868.75
12/01/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00

12/01/2020	Helen Fikrey	Staff Attorney		12	5.00	\$400.00	\$2,000.00
12/01/2020	Ingvar Olsson	Staff Attorney		12	9.00	\$400.00	\$3,600.00
12/01/2020	Jed Koslow	Staff Attorney		12	2.50	\$400.00	\$1,000.00
12/01/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/01/2020	Lawrence Hosmer	Senior Staff Attorneys		12	2.00	\$425.00	\$850.00
12/01/2020	Stephen Imundo	Senior Staff Attorneys		12	2.50	\$425.00	\$1,062.50
12/02/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
12/02/2020	Helen Fikrey	Staff Attorney		12	11.00	\$400.00	\$4,400.00
12/02/2020	Ingvar Olsson	Staff Attorney		12	7.25	\$400.00	\$2,900.00
12/02/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/02/2020	Lawrence Hosmer	Senior Staff Attorneys		12	5.25	\$425.00	\$2,231.25
12/02/2020	Stephen Imundo	Senior Staff Attorneys		12	2.25	\$425.00	\$956.25
12/02/2020	Jeremy Robinson	Partner		12	5.00	\$900.00	\$4,500.00
12/03/2020	Andrew Boruch	Senior Staff Attorneys		12	4.25	\$425.00	\$1,806.25
12/03/2020	Andrew Boruch	Senior Staff Attorneys		12	3.75	\$425.00	\$1,593.75
12/03/2020	Colette Foster	Staff Attorney		12	7.25	\$400.00	\$2,900.00
12/03/2020	Helen Fikrey	Staff Attorney		12	4.00	\$400.00	\$1,600.00
12/03/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/03/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/03/2020	Lawrence Hosmer	Senior Staff Attorneys		12	8.50	\$425.00	\$3,612.50
12/03/2020	Jeremy Robinson	Partner		12	4.00	\$900.00	\$3,600.00
12/04/2020	Colette Foster	Staff Attorney		12	3.00	\$400.00	\$1,200.00
12/04/2020	Helen Fikrey	Staff Attorney		12	11.00	\$400.00	\$4,400.00
12/04/2020	Ingvar Olsson	Staff Attorney		12	7.75	\$400.00	\$3,100.00
12/04/2020	Juan Lossada	Staff Attorney		12	6.00	\$400.00	\$2,400.00
12/05/2020	Colette Foster	Staff Attorney		12	4.00	\$400.00	\$1,600.00
12/05/2020	Jeremy Robinson	Partner		12	4.00	\$900.00	\$3,600.00
12/06/2020	Colette Foster	Staff Attorney		12	7.00	\$400.00	\$2,800.00
12/06/2020	Helen Fikrey	Staff Attorney		12	2.50	\$400.00	\$1,000.00
12/06/2020	Jeremy Robinson	Partner		12	2.00	\$900.00	\$1,800.00
12/07/2020	Colette Foster	Staff Attorney		12	7.00	\$400.00	\$2,800.00
12/07/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/07/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/07/2020	Richard Gluck	Senior Counsel		12	1.00	\$800.00	\$800.00
12/07/2020	Addison F. Golladay	Staff Attorney		12	3.50	\$400.00	\$1,400.00
12/07/2020	Stephen Imundo	Senior Staff Attorneys		12	2.00	\$425.00	\$850.00

12/08/2020	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
12/08/2020	Helen Fikrey	Staff Attorney		12	11.00	\$400.00	\$4,400.00
12/08/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/08/2020	Juan Lossada	Staff Attorney		12	2.25	\$400.00	\$900.00
12/08/2020	Juan Lossada	Staff Attorney		12	5.00	\$400.00	\$2,000.00
12/08/2020	Juan Lossada	Staff Attorney		12	0.75	\$400.00	\$300.00
12/08/2020	Justin Ratliff	Staff Attorney		12	0.75	\$350.00	\$262.50
12/08/2020	Stephen Imundo	Senior Staff Attorneys		12	7.50	\$425.00	\$3,187.50
12/09/2020	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
12/09/2020	Helen Fikrey	Staff Attorney		12	11.00	\$400.00	\$4,400.00
12/09/2020	Ingvar Olsson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/09/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/09/2020	Stephen Imundo	Senior Staff Attorneys		12	1.50	\$425.00	\$637.50
12/09/2020	Stephen Imundo	Senior Staff Attorneys		12	12.75	\$425.00	\$5,418.75
12/10/2020	Colette Foster	Staff Attorney		12	7.50	\$400.00	\$3,000.00
12/10/2020	Helen Fikrey	Staff Attorney		12	11.25	\$400.00	\$4,500.00
12/10/2020	Ingvar Olsson	Staff Attorney		12	9.50	\$400.00	\$3,800.00
12/10/2020	Juan Lossada	Staff Attorney		12	11.50	\$400.00	\$4,600.00
12/10/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
12/10/2020	Stephen Imundo	Senior Staff Attorneys		12	2.00	\$425.00	\$850.00
12/10/2020	Stephen Imundo	Senior Staff Attorneys		12	6.50	\$425.00	\$2,762.50
12/11/2020	Addison F. Golladay	Staff Attorney		12	2.50	\$400.00	\$1,000.00
12/11/2020	Colette Foster	Staff Attorney		12	5.00	\$400.00	\$2,000.00
12/11/2020	Helen Fikrey	Staff Attorney		12	1.00	\$400.00	\$400.00
12/11/2020	Ingvar Olsson	Staff Attorney		12	6.50	\$400.00	\$2,600.00
12/11/2020	Juan Lossada	Staff Attorney		12	4.50	\$400.00	\$1,800.00
12/12/2020	Helen Fikrey	Staff Attorney		12	3.25	\$400.00	\$1,300.00
12/13/2020	Colette Foster	Staff Attorney		12	3.00	\$400.00	\$1,200.00
12/13/2020	Helen Fikrey	Staff Attorney		12	2.50	\$400.00	\$1,000.00
12/14/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
12/14/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00

12/14/2020	Igor Faynshteyn	Staff Attorney		12	8.25	\$375.00	\$3,093.75
12/14/2020	Ingvar Olsson	Staff Attorney		12	4.50	\$400.00	\$1,800.00
12/14/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/14/2020	Stephen Imundo	Senior Staff Attorneys		12	6.25	\$425.00	\$2,656.25
12/15/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
12/15/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/15/2020	Helen Fikrey	Staff Attorney		12	4.50	\$400.00	\$1,800.00
12/15/2020	Igor Faynshteyn	Staff Attorney		12	7.25	\$375.00	\$2,718.75
12/15/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/15/2020	Stephen Imundo	Senior Staff Attorneys		12	5.25	\$425.00	\$2,231.25
12/16/2020	Addison F. Golladay	Staff Attorney		12	6.50	\$400.00	\$2,600.00
12/16/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/16/2020	Helen Fikrey	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/16/2020	Igor Faynshteyn	Staff Attorney		12	8.50	\$375.00	\$3,187.50
12/16/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/16/2020	Stephen Imundo	Senior Staff Attorneys		12	6.00	\$425.00	\$2,550.00
12/17/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/17/2020	Helen Fikrey	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/17/2020	Igor Faynshteyn	Staff Attorney		12	8.00	\$375.00	\$3,000.00
12/17/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/17/2020	Ryan Dykhous	Associate		12	0.75	\$425.00	\$318.75
12/17/2020	Stephen Imundo	Senior Staff Attorneys		12	4.00	\$425.00	\$1,700.00
12/18/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/18/2020	Helen Fikrey	Staff Attorney		12	7.00	\$400.00	\$2,800.00
12/18/2020	Igor Faynshteyn	Staff Attorney		12	16.00	\$375.00	\$6,000.00
12/18/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/18/2020	Stephen Imundo	Senior Staff Attorneys		12	1.25	\$425.00	\$531.25
12/19/2020	Helen Fikrey	Staff Attorney		12	9.75	\$400.00	\$3,900.00
12/20/2020	Helen Fikrey	Staff Attorney		12	2.75	\$400.00	\$1,100.00
12/21/2020	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
12/21/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00

12/21/2020	Lawrence Hosmer	Senior Staff Attorneys		12	11.25	\$425.00	\$4,781.25
12/22/2020	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
12/22/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/22/2020	Lawrence Hosmer	Senior Staff Attorneys		12	9.00	\$425.00	\$3,825.00
12/23/2020	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
12/23/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/23/2020	Lawrence Hosmer	Senior Staff Attorneys		12	9.25	\$425.00	\$3,931.25
12/23/2020	Stephen Imundo	Senior Staff Attorneys		12	8.75	\$425.00	\$3,718.75
12/24/2020	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/24/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/24/2020	Lawrence Hosmer	Senior Staff Attorneys		12	3.75	\$425.00	\$1,593.75
12/24/2020	Stephen Imundo	Senior Staff Attorneys		12	3.75	\$425.00	\$1,593.75
12/26/2020	Colette Foster	Staff Attorney		12	2.00	\$400.00	\$800.00
12/26/2020	Juan Lossada	Staff Attorney		12	4.00	\$400.00	\$1,600.00
12/27/2020	Juan Lossada	Staff Attorney		12	4.00	\$400.00	\$1,600.00
12/28/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/29/2020	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
12/29/2020	Richard Gluck	Senior Counsel		12	1.00	\$800.00	\$800.00
12/30/2020	Juan Lossada	Staff Attorney		12	12.00	\$400.00	\$4,800.00
12/31/2020	Juan Lossada	Staff Attorney		12	12.00	\$400.00	\$4,800.00
01/02/2021	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
01/02/2021	Lawrence Hosmer	Senior Staff Attorneys		12	5.00	\$425.00	\$2,125.00
01/03/2021	Juan Lossada	Staff Attorney		12	10.00	\$400.00	\$4,000.00
01/04/2021	Colette Foster	Staff Attorney		12	6.50	\$400.00	\$2,600.00
01/04/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/05/2021	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
01/05/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/06/2021	Colette Foster	Staff Attorney		12	6.50	\$400.00	\$2,600.00
01/06/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/07/2021	Colette Foster	Staff Attorney		12	7.50	\$400.00	\$3,000.00
01/07/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/08/2021	Colette Foster	Staff Attorney		12	5.50	\$400.00	\$2,200.00
01/08/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/09/2021	Colette Foster	Staff Attorney		12	5.50	\$400.00	\$2,200.00
01/09/2021	Rebecca Boon	Partner		12	1.00	\$875.00	\$875.00
01/11/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/11/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/11/2021	Lawrence Hosmer	Senior Staff Attorneys		12	3.50	\$425.00	\$1,487.50
01/12/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/12/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/13/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00

01/13/2021	Jed Koslow	Staff Attorney		12	2.50	\$400.00	\$1,000.00
01/13/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/14/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/14/2021	Jed Koslow	Staff Attorney		12	6.25	\$400.00	\$2,500.00
01/14/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/14/2021	Lawrence Hosmer	Senior Staff Attorneys		12	4.00	\$425.00	\$1,700.00
01/15/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/15/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/15/2021	Lawrence Hosmer	Senior Staff Attorneys		12	3.50	\$425.00	\$1,487.50
01/17/2021	Andrew Boruch	Senior Staff Attorneys		12	6.00	\$425.00	\$2,550.00
01/19/2021	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
01/19/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/20/2021	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
01/20/2021	Jed Koslow	Staff Attorney		12	3.00	\$400.00	\$1,200.00
01/20/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/20/2021	Lawrence Hosmer	Senior Staff Attorneys		12	7.00	\$425.00	\$2,975.00
01/20/2021	Ryan Dykhous	Associate		12	0.50	\$425.00	\$212.50
01/21/2021	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
01/21/2021	Helen Fikrey	Staff Attorney		12	9.75	\$400.00	\$3,900.00
01/21/2021	Jed Koslow	Staff Attorney		12	9.25	\$400.00	\$3,700.00
01/21/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/22/2021	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
01/22/2021	Helen Fikrey	Staff Attorney		12	3.00	\$400.00	\$1,200.00
01/22/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/23/2021	Colette Foster	Staff Attorney		12	3.00	\$400.00	\$1,200.00
01/23/2021	Helen Fikrey	Staff Attorney		12	3.25	\$400.00	\$1,300.00
01/23/2021	Juan Lossada	Staff Attorney		12	1.25	\$400.00	\$500.00
01/24/2021	Juan Lossada	Staff Attorney		12	6.75	\$400.00	\$2,700.00
01/25/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/26/2021	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
01/26/2021	Erick Ladson	Staff Attorney		12	11.00	\$400.00	\$4,400.00
01/26/2021	Jed Koslow	Staff Attorney		12	5.00	\$400.00	\$2,000.00
01/26/2021	Jose Echegaray	Case Managers		12	5.00	\$350.00	\$1,750.00
01/26/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/27/2021	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
01/27/2021	Erick Ladson	Staff Attorney		12	5.50	\$400.00	\$2,200.00
01/27/2021	Jose Echegaray	Case Managers		12	5.00	\$350.00	\$1,750.00

01/27/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/28/2021	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
01/28/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/29/2021	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
01/29/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
01/29/2021	Lawrence Hosmer	Senior Staff Attorneys		12	12.25	\$425.00	\$5,206.25
01/30/2021	Colette Foster	Staff Attorney		12	4.50	\$400.00	\$1,800.00
01/30/2021	Jeremy Robinson	Partner		12	3.00	\$900.00	\$2,700.00
02/01/2021	Addison F. Golladay	Staff Attorney		12	9.00	\$400.00	\$3,600.00
02/01/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/01/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/01/2021	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
02/01/2021	Jeremy Robinson	Partner		12	3.00	\$900.00	\$2,700.00
02/02/2021	Addison F. Golladay	Staff Attorney		12	7.00	\$400.00	\$2,800.00
02/02/2021	Brian Chau	Senior Staff Attorneys		12	10.00	\$425.00	\$4,250.00
02/02/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/02/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/02/2021	Lauren Cormier	Staff Attorney		12	8.00	\$375.00	\$3,000.00
02/03/2021	Addison F. Golladay	Staff Attorney		12	8.50	\$400.00	\$3,400.00
02/03/2021	Brian Chau	Senior Staff Attorneys		12	10.00	\$425.00	\$4,250.00
02/03/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/03/2021	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/03/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/03/2021	Jeremy Robinson	Partner		12	3.00	\$900.00	\$2,700.00
02/04/2021	Addison F. Golladay	Staff Attorney		12	11.00	\$400.00	\$4,400.00
02/04/2021	Brian Chau	Senior Staff Attorneys		12	10.00	\$425.00	\$4,250.00
02/04/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/04/2021	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/04/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/05/2021	Addison F. Golladay	Staff Attorney		12	4.50	\$400.00	\$1,800.00
02/05/2021	Brian Chau	Senior Staff Attorneys		12	10.00	\$425.00	\$4,250.00
02/05/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/05/2021	Erick Ladson	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/05/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/07/2021	Jeremy Robinson	Partner		12	4.00	\$900.00	\$3,600.00
02/08/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/08/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00

02/09/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/09/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/10/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/10/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/11/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/11/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/11/2021	Mahiri Buffong	Managing Clerk		12	0.25	\$375.00	\$93.75
02/12/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/12/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/16/2021	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
02/16/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/16/2021	Stephen Imundo	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
02/17/2021	Colette Foster	Staff Attorney		12	9.00	\$400.00	\$3,600.00
02/17/2021	Erick Ladson	Staff Attorney		12	9.00	\$400.00	\$3,600.00
02/17/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/17/2021	Richard Gluck	Senior Counsel		12	0.75	\$800.00	\$600.00
02/18/2021	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
02/18/2021	Lawrence Hosmer	Senior Staff Attorneys		12	2.75	\$425.00	\$1,168.75
02/18/2021	Richard Gluck	Senior Counsel		12	0.50	\$800.00	\$400.00
02/19/2021	Colette Foster	Staff Attorney		12	8.50	\$400.00	\$3,400.00
02/19/2021	Lawrence Hosmer	Senior Staff Attorneys		12	2.50	\$425.00	\$1,062.50
02/20/2021	Colette Foster	Staff Attorney		12	2.50	\$400.00	\$1,000.00
02/20/2021	Juan Lossada	Staff Attorney		12	5.75	\$400.00	\$2,300.00
02/20/2021	Lawrence Hosmer	Senior Staff Attorneys		12	1.00	\$425.00	\$425.00
02/21/2021	Colette Foster	Staff Attorney		12	3.00	\$400.00	\$1,200.00
02/21/2021	Juan Lossada	Staff Attorney		12	2.25	\$400.00	\$900.00
02/22/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/22/2021	Lawrence Hosmer	Senior Staff Attorneys		12	9.50	\$425.00	\$4,037.50
02/23/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/24/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/25/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
02/25/2021	Mahiri Buffong	Managing Clerk		12	6.00	\$375.00	\$2,250.00
02/26/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/01/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/02/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/02/2021	Lawrence Hosmer	Senior Staff Attorneys		12	3.75	\$425.00	\$1,593.75
03/03/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00

03/04/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/05/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/08/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/09/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/10/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/11/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/12/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/15/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/16/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/16/2021	Juan Lossada	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/17/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/18/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/19/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/19/2021	Lawrence Hosmer	Senior Staff Attorneys		12	8.75	\$425.00	\$3,718.75
03/19/2021	Richard Gluck	Senior Counsel		12	0.25	\$800.00	\$200.00
03/22/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/23/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/24/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/24/2021	Lawrence Hosmer	Senior Staff Attorneys		12	7.50	\$425.00	\$3,187.50
03/25/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/26/2021	Colette Foster	Staff Attorney		12	8.00	\$400.00	\$3,200.00
03/26/2021	Lawrence Hosmer	Senior Staff Attorneys		12	8.00	\$425.00	\$3,400.00
03/29/2021	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
03/29/2021	Lawrence Hosmer	Senior Staff Attorneys		12	7.50	\$425.00	\$3,187.50
03/29/2021	Stephen Imundo	Senior Staff Attorneys		12	7.50	\$425.00	\$3,187.50
03/30/2021	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
03/31/2021	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
04/01/2021	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
04/07/2021	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
04/08/2021	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
04/09/2021	Colette Foster	Staff Attorney		12	10.00	\$400.00	\$4,000.00
04/10/2021	Colette Foster	Staff Attorney		12	5.00	\$400.00	\$2,000.00
			TOTALS FOR PROJECT #12:		17,867.25		\$7,220,562.50

Project #13: Interrogatories (directed to Defendants). As set forth below, Lead Counsel spent a total of 12.75 hours with a lodestar of \$9,187.50 in preparing Lead Plaintiff's two sets of interrogatories on Defendants, including related discussions and strategy and reviewing Defendants' objections and responses to the interrogatories.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/04/2020	Johanna Pitcairn	Litigation Support		13	0.25	\$400.00	\$100.00
11/24/2020	Richard Gluck	Senior Counsel		13	0.50	\$800.00	\$400.00
11/25/2020	Jeremy Robinson	Partner		13	2.00	\$900.00	\$1,800.00
12/07/2020	Richard Gluck	Senior Counsel		13	1.75	\$800.00	\$1,400.00
12/08/2020	Richard Gluck	Senior Counsel		13	0.50	\$800.00	\$400.00
12/08/2020	Richard Gluck	Senior Counsel		13	0.75	\$800.00	\$600.00
12/09/2020	Richard Gluck	Senior Counsel		13	0.50	\$800.00	\$400.00
12/09/2020	Jeremy Robinson	Partner		13	2.00	\$900.00	\$1,800.00
12/29/2020	Richard Gluck	Senior Counsel		13	0.50	\$800.00	\$400.00
12/31/2020	Stephen Imundo	Senior Staff Attorneys		13	2.25	\$425.00	\$956.25
01/07/2021	Richard Gluck	Senior Counsel		13	0.50	\$800.00	\$400.00
01/07/2021	Ryan Dykhous	Associate		13	0.50	\$425.00	\$212.50
02/28/2021	Ryan Dykhous	Associate		13	0.75	\$425.00	\$318.75
			TOTALS FOR PROJECT #13:		12.75		\$9,187.50

Project #14: Responding to Defendants' Requests for Production of Documents (directed to Lead Plaintiff). As set forth below, Lead Counsel spent a total of 60.75 hours with a lodestar of \$35,750.00 preparing objections and responses to Defendants' document requests on Lead Plaintiff and assisting Lead Plaintiff in the production of responsive documents.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/07/2019	Rebecca Boon	Partner		14	1.00	\$875.00	\$875.00
11/08/2019	Jose Echegaray	Case Managers		14	0.25	\$350.00	\$87.50
11/20/2019	Rebecca Boon	Partner		14	1.00	\$875.00	\$875.00
11/25/2019	Rebecca Boon	Partner		14	1.00	\$875.00	\$875.00
11/26/2019	Rebecca Boon	Partner		14	2.00	\$875.00	\$1,750.00
12/03/2019	Rebecca Boon	Partner		14	3.00	\$875.00	\$2,625.00
12/09/2019	Rebecca Boon	Partner		14	1.50	\$875.00	\$1,312.50
12/10/2019	Rebecca Boon	Partner		14	2.50	\$875.00	\$2,187.50

01/07/2020	Michelle Leung	Case Managers		14	0.25	\$350.00	\$87.50
01/08/2020	Salvatore Graziano	Partner		14	0.50	\$1,150.00	\$575.00
01/08/2020	Rebecca Boon	Partner		14	1.50	\$875.00	\$1,312.50
01/14/2020	Jose Echegaray	Case Managers		14	0.50	\$350.00	\$175.00
01/14/2020	Salvatore Graziano	Partner		14	0.50	\$1,150.00	\$575.00
01/21/2020	Johanna Pitcairn	Litigation Support		14	2.00	\$400.00	\$800.00
01/21/2020	Jose Echegaray	Case Managers		14	0.75	\$350.00	\$262.50
01/21/2020	Jose Echegaray	Case Managers		14	1.25	\$350.00	\$437.50
01/21/2020	Michelle Leung	Case Managers		14	2.75	\$350.00	\$962.50
01/21/2020	Ryan Dykhous	Associate		14	1.25	\$425.00	\$531.25
01/22/2020	Michelle Leung	Case Managers		14	0.50	\$350.00	\$175.00
01/22/2020	Ryan Dykhous	Associate		14	0.75	\$425.00	\$318.75
01/24/2020	Ryan Dykhous	Associate		14	1.50	\$425.00	\$637.50
01/24/2020	Rebecca Boon	Partner		14	2.00	\$875.00	\$1,750.00
01/27/2020	Ingvar Olsson	Staff Attorney		14	4.50	\$400.00	\$1,800.00
01/27/2020	Michelle Leung	Case Managers		14	1.00	\$350.00	\$350.00
01/27/2020	Rebecca Boon	Partner		14	3.75	\$875.00	\$3,281.25
01/28/2020	Ingvar Olsson	Staff Attorney		14	8.00	\$400.00	\$3,200.00
01/28/2020	Ryan Dykhous	Associate		14	3.50	\$425.00	\$1,487.50
01/28/2020	Rebecca Boon	Partner		14	1.50	\$875.00	\$1,312.50
01/29/2020	Ingvar Olsson	Staff Attorney		14	2.25	\$400.00	\$900.00
01/29/2020	Salvatore Graziano	Partner		14	0.25	\$1,150.00	\$287.50
01/30/2020	Ingvar Olsson	Staff Attorney		14	1.00	\$400.00	\$400.00
02/02/2020	Rebecca Boon	Partner		14	1.50	\$875.00	\$1,312.50
02/03/2020	Ryan Dykhous	Associate		14	2.75	\$425.00	\$1,168.75
02/06/2020	Ryan Dykhous	Associate		14	2.50	\$425.00	\$1,062.50
				TOTALS FOR PROJECT #14:		60.75	\$35,750.00

Project #15: Lead Plaintiff's Response to Defendants' Requests for Admission. As set forth below, Lead Counsel spent a total of 16.25 hours with a lodestar of \$7,750.00 in preparing responses and objections to the Requests for Admission served on Lead Plaintiff by Defendants, including related discussions and strategy.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar	
10/13/2020	Richard Gluck	Senior Counsel		15	0.25	\$800.00	\$200.00	
11/04/2020	Ryan Dykhous	Associate		15	0.75	\$425.00	\$318.75	
11/05/2020	Ryan Dykhous	Associate		15	0.75	\$425.00	\$318.75	
11/06/2020	Ryan Dykhous	Associate		15	0.75	\$425.00	\$318.75	
11/07/2020	Ryan Dykhous	Associate		15	1.25	\$425.00	\$531.25	
11/08/2020	Ryan Dykhous	Associate		15	1.00	\$425.00	\$425.00	
11/09/2020	Ryan Dykhous	Associate		15	1.75	\$425.00	\$743.75	
11/10/2020	Ryan Dykhous	Associate		15	0.75	\$425.00	\$318.75	
11/18/2020	Richard Gluck	Senior Counsel		15	0.25	\$800.00	\$200.00	
11/19/2020	Ryan Dykhous	Associate		15	1.50	\$425.00	\$637.50	
11/20/2020	Richard Gluck	Senior Counsel		15	0.25	\$800.00	\$200.00	
11/20/2020	Ryan Dykhous	Associate		15	1.25	\$425.00	\$531.25	
01/26/2021	Ryan Dykhous	Associate		15	1.00	\$425.00	\$425.00	
01/27/2021	Richard Gluck	Senior Counsel		15	0.25	\$800.00	\$200.00	
01/31/2021	Ryan Dykhous	Associate		15	0.50	\$425.00	\$212.50	
02/01/2021	Richard Gluck	Senior Counsel		15	0.75	\$800.00	\$600.00	
02/01/2021	Richard Gluck	Senior Counsel		15	0.50	\$800.00	\$400.00	
02/01/2021	Ryan Dykhous	Associate		15	2.75	\$425.00	\$1,168.75	
				TOTALS FOR PROJECT #15:			16.25	

Project #16: Lead Plaintiff's Response to Defendants' Interrogatories. As set forth below, Lead Counsel spent a total of 276 hours with a lodestar of \$119,656.25 in preparing responses and objections to the contention Interrogatories served on Lead Plaintiff by Defendants, which including searching for and identifying documents for inclusion in Lead Plaintiff's detailed responses to Defendants' detailed contention interrogatories.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
10/13/2020	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
11/04/2020	Jose Echegaray	Case Managers		16	0.25	\$350.00	\$87.50
11/04/2020	Ryan Dykhous	Associate		16	1.00	\$425.00	\$425.00
11/05/2020	Ryan Dykhous	Associate		16	1.00	\$425.00	\$425.00
11/06/2020	Ryan Dykhous	Associate		16	0.50	\$425.00	\$212.50
11/09/2020	Ryan Dykhous	Associate		16	7.50	\$425.00	\$3,187.50
11/18/2020	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00

11/19/2020	Ryan Dykhous	Associate		16	1.75	\$425.00	\$743.75
11/19/2020	Jeremy Robinson	Partner		16	3.00	\$900.00	\$2,700.00
11/20/2020	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
11/20/2020	Ryan Dykhous	Associate		16	1.50	\$425.00	\$637.50
12/02/2020	Richard Gluck	Senior Counsel		16	1.25	\$800.00	\$1,000.00
12/03/2020	Richard Gluck	Senior Counsel		16	1.00	\$800.00	\$800.00
12/03/2020	Richard Gluck	Senior Counsel		16	0.50	\$800.00	\$400.00
12/03/2020	Richard Gluck	Senior Counsel		16	0.75	\$800.00	\$600.00
12/08/2020	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
12/09/2020	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
12/14/2020	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
12/15/2020	Erick Ladson	Staff Attorney		16	2.50	\$400.00	\$1,000.00
12/15/2020	Ryan Dykhous	Associate		16	1.25	\$425.00	\$531.25
12/15/2020	Stephen Imundo	Senior Staff Attorneys		16	1.00	\$425.00	\$425.00
12/16/2020	Erick Ladson	Staff Attorney		16	2.00	\$400.00	\$800.00
12/16/2020	Erick Ladson	Staff Attorney		16	5.00	\$400.00	\$2,000.00
12/16/2020	Monique Hardial	Staff Attorney		16	6.00	\$375.00	\$2,250.00
12/17/2020	Erick Ladson	Staff Attorney		16	7.00	\$400.00	\$2,800.00
12/17/2020	Monique Hardial	Staff Attorney		16	10.50	\$375.00	\$3,937.50
12/17/2020	Richard Gluck	Senior Counsel		16	0.50	\$800.00	\$400.00
12/18/2020	Erick Ladson	Staff Attorney		16	10.00	\$400.00	\$4,000.00
12/18/2020	Monique Hardial	Staff Attorney		16	20.00	\$375.00	\$7,500.00
12/18/2020	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
12/18/2020	Richard Gluck	Senior Counsel		16	0.50	\$800.00	\$400.00
12/21/2020	Erick Ladson	Staff Attorney		16	10.50	\$400.00	\$4,200.00

12/22/2020	Erick Ladson	Staff Attorney		16	7.00	\$400.00	\$2,800.00
12/23/2020	Erick Ladson	Staff Attorney		16	8.00	\$400.00	\$3,200.00
12/24/2020	Erick Ladson	Staff Attorney		16	6.50	\$400.00	\$2,600.00
12/27/2020	Erick Ladson	Staff Attorney		16	4.00	\$400.00	\$1,600.00
12/28/2020	Erick Ladson	Staff Attorney		16	4.25	\$400.00	\$1,700.00
12/29/2020	Stephen Imundo	Senior Staff Attorneys		16	4.75	\$425.00	\$2,018.75
12/30/2020	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
12/30/2020	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
12/30/2020	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
12/30/2020	Stephen Imundo	Senior Staff Attorneys		16	4.75	\$425.00	\$2,018.75
12/30/2020	Stephen Imundo	Senior Staff Attorneys		16	2.00	\$425.00	\$850.00
12/30/2020	Jeremy Robinson	Partner		16	3.00	\$900.00	\$2,700.00
12/31/2020	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
01/01/2021	Ryan Dykhous	Associate		16	2.00	\$425.00	\$850.00
01/02/2021	Ryan Dykhous	Associate		16	4.00	\$425.00	\$1,700.00
01/03/2021	Ryan Dykhous	Associate		16	4.50	\$425.00	\$1,912.50
01/04/2021	Richard Gluck	Senior Counsel		16	0.50	\$800.00	\$400.00
01/04/2021	Ryan Dykhous	Associate		16	0.25	\$425.00	\$106.25
01/04/2021	Ryan Dykhous	Associate		16	0.50	\$425.00	\$212.50
01/04/2021	Ryan Dykhous	Associate		16	0.25	\$425.00	\$106.25
01/04/2021	Ryan Dykhous	Associate		16	2.25	\$425.00	\$956.25
01/05/2021	Ryan Dykhous	Associate		16	3.25	\$425.00	\$1,381.25
01/07/2021	Ryan Dykhous	Associate		16	0.50	\$425.00	\$212.50
01/25/2021	Stephen Imundo	Senior Staff Attorneys		16	3.00	\$425.00	\$1,275.00
01/26/2021	Brian Chau	Senior Staff Attorneys		16	10.00	\$425.00	\$4,250.00
01/26/2021	Ryan Candee	Senior Staff Attorneys		16	4.75	\$425.00	\$2,018.75
01/26/2021	Ryan Dykhous	Associate		16	2.50	\$425.00	\$1,062.50
01/26/2021	Stephen Imundo	Senior Staff Attorneys		16	9.50	\$425.00	\$4,037.50
01/27/2021	Andrew Boruch	Senior Staff Attorneys		16	4.50	\$425.00	\$1,912.50

01/27/2021	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
01/27/2021	Ryan Dykhous	Associate		16	8.75	\$425.00	\$3,718.75
01/27/2021	Stephen Imundo	Senior Staff Attorneys		16	3.00	\$425.00	\$1,275.00
01/31/2021	Ryan Dykhous	Associate		16	0.75	\$425.00	\$318.75
02/01/2021	Helen Fikrey	Staff Attorney		16	7.00	\$400.00	\$2,800.00
02/01/2021	Richard Gluck	Senior Counsel		16	0.75	\$800.00	\$600.00
02/01/2021	Richard Gluck	Senior Counsel		16	0.50	\$800.00	\$400.00
02/01/2021	Richard Gluck	Senior Counsel		16	1.25	\$800.00	\$1,000.00
02/01/2021	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
02/01/2021	Richard Gluck	Senior Counsel		16	0.50	\$800.00	\$400.00
02/01/2021	Ryan Dykhous	Associate		16	4.00	\$425.00	\$1,700.00
02/01/2021	Stephen Imundo	Senior Staff Attorneys		16	8.50	\$425.00	\$3,612.50
02/02/2021	Jose Echegaray	Case Managers		16	0.25	\$350.00	\$87.50
02/08/2021	Richard Gluck	Senior Counsel		16	0.25	\$800.00	\$200.00
03/23/2021	Jed Koslow	Staff Attorney		16	9.00	\$400.00	\$3,600.00
03/24/2021	Erick Ladson	Staff Attorney		16	11.00	\$400.00	\$4,400.00
03/24/2021	Jed Koslow	Staff Attorney		16	8.75	\$400.00	\$3,500.00
03/25/2021	Erick Ladson	Staff Attorney		16	9.00	\$400.00	\$3,600.00
03/25/2021	Jed Koslow	Staff Attorney		16	4.25	\$400.00	\$1,700.00
03/26/2021	Erick Ladson	Staff Attorney		16	2.00	\$400.00	\$800.00
				TOTALS FOR PROJECT #16:		276.00	\$119,656.25

Project #17: Written Discovery Directed at Third Parties. Lead Plaintiff served subpoenas on, and obtained documents from twelve (12) non-parties, including Symantec's outside auditor (KPMG), its accounting consultant (E&Y), and two SEC whistleblowers (referred to herein as Former Employee 1 ("FE1") and Former Employee 2 ("FE2")). Lead Counsel spent a total of 371 hours with a lodestar of \$167,187.50 on written discovery efforts directed at these third parties. The work, the details of which are broken down chronologically below, included identifying third parties with potentially relevant information, preparing and serving subpoenas for production of documents on these third parties, meeting and conferring and generally communicating concerning the third parties' responses and productions, including by email and/or letter, and reviewing and analyzing the documents obtained from the third parties. This project does not include Lead Counsel's efforts in preparing for and taking the depositions of certain of the third parties, which have their own projects.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
12/10/2019	Ryan Dykhous	Associate		17	1.25	\$425.00	\$531.25
12/19/2019	Ryan Dykhous	Associate		17	1.75	\$425.00	\$743.75
12/23/2019	Julia Tebor	Associate		17	1.00	\$575.00	\$575.00
12/24/2019	Julia Tebor	Associate		17	2.00	\$575.00	\$1,150.00
12/25/2019	Julia Tebor	Associate		17	1.00	\$575.00	\$575.00
01/08/2020	Jose Echegaray	Case Managers		17	0.50	\$350.00	\$175.00
01/08/2020	Michelle Leung	Case Managers		17	2.00	\$350.00	\$700.00
01/08/2020	Ryan Dykhous	Associate		17	1.00	\$425.00	\$425.00
01/09/2020	Ryan Dykhous	Associate		17	1.75	\$425.00	\$743.75
01/09/2020	Ryan Dykhous	Associate		17	1.75	\$425.00	\$743.75
01/13/2020	Ryan Dykhous	Associate		17	0.75	\$425.00	\$318.75
01/17/2020	Johanna Pitcairn	Litigation Support		17	1.00	\$400.00	\$400.00
02/03/2020	Ryan Dykhous	Associate		17	2.75	\$425.00	\$1,168.75
02/04/2020	Ryan Dykhous	Associate		17	1.25	\$425.00	\$531.25
02/11/2020	Michelle Leung	Case Managers		17	0.75	\$350.00	\$262.50
02/11/2020	Ryan Dykhous	Associate		17	1.00	\$425.00	\$425.00
02/12/2020	Jose Echegaray	Case Managers		17	2.00	\$350.00	\$700.00
02/12/2020	Ryan Dykhous	Associate		17	1.75	\$425.00	\$743.75
02/20/2020	Jose Echegaray	Case Managers		17	0.25	\$350.00	\$87.50
02/21/2020	Jose Echegaray	Case Managers		17	0.25	\$350.00	\$87.50
02/28/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
03/02/2020	Jose Echegaray	Case Managers		17	0.25	\$350.00	\$87.50
03/02/2020	Jose Echegaray	Case Managers		17	0.75	\$350.00	\$262.50
03/02/2020	Ryan Dykhous	Associate		17	1.00	\$425.00	\$425.00

03/02/2020	Rebecca Boon	Partner		17	2.00	\$875.00	\$1,750.00
03/09/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
03/10/2020	Ryan Dykhous	Associate		17	0.75	\$425.00	\$318.75
03/11/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
03/16/2020	Ryan Dykhous	Associate		17	1.00	\$425.00	\$425.00
03/25/2020	Jose Echegaray	Case Managers		17	0.50	\$350.00	\$175.00
03/30/2020	Johanna Pitcairn	Litigation Support		17	0.75	\$400.00	\$300.00
03/30/2020	Rebecca Boon	Partner		17	0.50	\$875.00	\$437.50
03/31/2020	Ryan Dykhous	Associate		17	1.00	\$425.00	\$425.00
03/31/2020	Ryan Dykhous	Associate		17	0.75	\$425.00	\$318.75
04/06/2020	Ryan Dykhous	Associate		17	0.75	\$425.00	\$318.75
04/10/2020	Ryan Dykhous	Associate		17	1.00	\$425.00	\$425.00
04/10/2020	Ryan Dykhous	Associate		17	0.50	\$425.00	\$212.50
04/10/2020	Jeremy Robinson	Partner		17	2.00	\$900.00	\$1,800.00
04/10/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
04/14/2020	Ryan Dykhous	Associate		17	0.50	\$425.00	\$212.50
04/21/2020	Rebecca Boon	Partner		17	0.25	\$875.00	\$218.75
04/28/2020	Stephen Imundo	Senior Staff Attorneys		17	6.00	\$425.00	\$2,550.00
05/05/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
05/11/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
06/09/2020	Johanna Pitcairn	Litigation Support		17	1.00	\$400.00	\$400.00
06/10/2020	Johanna Pitcairn	Litigation Support		17	1.00	\$400.00	\$400.00
06/10/2020	Ryan Dykhous	Associate		17	0.50	\$425.00	\$212.50
06/12/2020	Ryan Dykhous	Associate		17	0.75	\$425.00	\$318.75
06/15/2020	Ryan Dykhous	Associate		17	1.00	\$425.00	\$425.00
06/16/2020	Ryan Dykhous	Associate		17	0.75	\$425.00	\$318.75
06/16/2020	Stephen Imundo	Senior Staff Attorneys		17	3.00	\$425.00	\$1,275.00
06/17/2020	Ryan Dykhous	Associate		17	1.50	\$425.00	\$637.50
06/18/2020	Ryan Dykhous	Associate		17	2.00	\$425.00	\$850.00
06/19/2020	Ryan Dykhous	Associate		17	3.00	\$425.00	\$1,275.00
06/22/2020	Jose Echegaray	Case Managers		17	0.25	\$350.00	\$87.50

06/22/2020	Ryan Dykhous	Associate	17	1.25	\$425.00	\$531.25
06/22/2020	Ryan Dykhous	Associate	17	1.50	\$425.00	\$637.50
06/23/2020	Jose Echegaray	Case Managers	17	1.00	\$350.00	\$350.00
06/23/2020	Ryan Dykhous	Associate	17	3.75	\$425.00	\$1,593.75
06/29/2020	Jose Echegaray	Case Managers	17	1.00	\$350.00	\$350.00
06/29/2020	Ryan Dykhous	Associate	17	1.00	\$425.00	\$425.00
06/30/2020	Jose Echegaray	Case Managers	17	0.75	\$350.00	\$262.50
06/30/2020	Ryan Dykhous	Associate	17	1.50	\$425.00	\$637.50
07/02/2020	Ryan Dykhous	Associate	17	1.00	\$425.00	\$425.00
07/06/2020	Jose Echegaray	Case Managers	17	0.75	\$350.00	\$262.50
07/06/2020	Ryan Dykhous	Associate	17	0.50	\$425.00	\$212.50
07/07/2020	Jose Echegaray	Case Managers	17	0.50	\$350.00	\$175.00
07/07/2020	Ryan Dykhous	Associate	17	0.50	\$425.00	\$212.50
07/08/2020	Ryan Dykhous	Associate	17	0.50	\$425.00	\$212.50
07/10/2020	Ryan Dykhous	Associate	17	0.50	\$425.00	\$212.50
07/13/2020	Ryan Dykhous	Associate	17	0.25	\$425.00	\$106.25
07/13/2020	Ryan Dykhous	Associate	17	1.00	\$425.00	\$425.00
07/15/2020	Jose Echegaray	Case Managers	17	0.25	\$350.00	\$87.50
07/15/2020	Jose Echegaray	Case Managers	17	0.25	\$350.00	\$87.50
07/15/2020	Ryan Dykhous	Associate	17	0.25	\$425.00	\$106.25
07/16/2020	Mahiri Buffong	Managing Clerk	17	0.50	\$375.00	\$187.50
07/16/2020	Ryan Dykhous	Associate	17	0.25	\$425.00	\$106.25
07/19/2020	Ryan Dykhous	Associate	17	0.25	\$425.00	\$106.25
07/20/2020	Jose Echegaray	Case Managers	17	0.25	\$350.00	\$87.50
07/20/2020	Lauren Cormier	Staff Attorney	17	8.00	\$375.00	\$3,000.00
07/20/2020	Monique Hardial	Staff Attorney	17	4.00	\$375.00	\$1,500.00
07/21/2020	Ibrahim Hamed	Staff Attorney	17	10.50	\$400.00	\$4,200.00
07/21/2020	Jose Echegaray	Case Managers	17	0.25	\$350.00	\$87.50
07/21/2020	Lauren Cormier	Staff Attorney	17	8.00	\$375.00	\$3,000.00
07/21/2020	Monique Hardial	Staff Attorney	17	4.00	\$375.00	\$1,500.00
07/21/2020	Ryan Dykhous	Associate	17	0.50	\$425.00	\$212.50
07/21/2020	Ryan Dykhous	Associate	17	0.50	\$425.00	\$212.50
07/21/2020	Stephen Imundo	Senior Staff Attorneys	17	9.00	\$425.00	\$3,825.00

07/22/2020	Ryan Dykhous	Associate		17	1.75	\$425.00	\$743.75
07/23/2020	Johanna Pitcairn	Litigation Support		17	2.00	\$400.00	\$800.00
07/24/2020	Ryan Dykhous	Associate		17	0.50	\$425.00	\$212.50
07/27/2020	Jose Echegaray	Case Managers		17	0.75	\$350.00	\$262.50
07/27/2020	Ryan Dykhous	Associate		17	1.00	\$425.00	\$425.00
07/28/2020	Johanna Pitcairn	Litigation Support		17	1.50	\$400.00	\$600.00
07/28/2020	Ryan Dykhous	Associate		17	1.00	\$425.00	\$425.00
07/28/2020	Ryan Dykhous	Associate		17	0.50	\$425.00	\$212.50
07/28/2020	Ryan Dykhous	Associate		17	0.50	\$425.00	\$212.50
07/30/2020	Ryan Dykhous	Associate		17	0.75	\$425.00	\$318.75
07/30/2020	Ryan Dykhous	Associate		17	1.25	\$425.00	\$531.25
07/30/2020	Ryan Dykhous	Associate		17	0.75	\$425.00	\$318.75
07/31/2020	Ryan Dykhous	Associate		17	1.50	\$425.00	\$637.50
08/03/2020	Addison F. Golladay	Staff Attorney		17	6.00	\$400.00	\$2,400.00
08/03/2020	Johanna Pitcairn	Litigation Support		17	0.50	\$400.00	\$200.00
08/03/2020	Ryan Dykhous	Associate		17	1.75	\$425.00	\$743.75
08/04/2020	Addison F. Golladay	Staff Attorney		17	7.50	\$400.00	\$3,000.00
08/04/2020	Ryan Dykhous	Associate		17	0.50	\$425.00	\$212.50
08/04/2020	Ryan Dykhous	Associate		17	0.50	\$425.00	\$212.50
08/06/2020	Ryan Dykhous	Associate		17	0.50	\$425.00	\$212.50
08/13/2020	Ryan Dykhous	Associate		17	1.25	\$425.00	\$531.25
08/14/2020	Ryan Dykhous	Associate		17	0.75	\$425.00	\$318.75
08/14/2020	Ryan Dykhous	Associate		17	1.75	\$425.00	\$743.75
08/17/2020	Johanna Pitcairn	Litigation Support		17	1.50	\$400.00	\$600.00
08/17/2020	Ryan Dykhous	Associate		17	1.00	\$425.00	\$425.00
08/17/2020	Ryan Dykhous	Associate		17	0.50	\$425.00	\$212.50
08/17/2020	Stephen Imundo	Senior Staff Attorneys		17	2.25	\$425.00	\$956.25
08/17/2020	Jeremy Robinson	Partner		17	2.50	\$900.00	\$2,250.00
08/18/2020	Jed Koslow	Staff Attorney		17	11.00	\$400.00	\$4,400.00

08/18/2020	Johanna Pitcairn	Litigation Support		17	2.00	\$400.00	\$800.00
08/24/2020	Ryan Dykhous	Associate		17	0.75	\$425.00	\$318.75
08/31/2020	Ryan Dykhous	Associate		17	1.25	\$425.00	\$531.25
09/04/2020	Monique Hardial	Staff Attorney		17	9.50	\$375.00	\$3,562.50
09/07/2020	Ryan Dykhous	Associate		17	1.00	\$425.00	\$425.00
09/10/2020	Monique Hardial	Staff Attorney		17	5.00	\$375.00	\$1,875.00
09/11/2020	Monique Hardial	Staff Attorney		17	10.00	\$375.00	\$3,750.00
09/14/2020	Monique Hardial	Staff Attorney		17	7.50	\$375.00	\$2,812.50
09/15/2020	Monique Hardial	Staff Attorney		17	9.00	\$375.00	\$3,375.00
09/16/2020	Monique Hardial	Staff Attorney		17	7.50	\$375.00	\$2,812.50
09/17/2020	Jeremy Robinson	Partner		17	1.50	\$900.00	\$1,350.00
09/20/2020	Johanna Pitcairn	Litigation Support		17	3.00	\$400.00	\$1,200.00
09/23/2020	Monique Hardial	Staff Attorney		17	8.00	\$375.00	\$3,000.00
09/28/2020	Johanna Pitcairn	Litigation Support		17	2.50	\$400.00	\$1,000.00
10/03/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
10/06/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
10/07/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
10/08/2020	Stephen Imundo	Senior Staff Attorneys		17	7.25	\$425.00	\$3,081.25
10/08/2020	Stephen Imundo	Senior Staff Attorneys		17	2.75	\$425.00	\$1,168.75
10/09/2020	Stephen Imundo	Senior Staff Attorneys		17	4.75	\$425.00	\$2,018.75
10/11/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
10/12/2020	Rebecca Boon	Partner		17	1.50	\$875.00	\$1,312.50
10/13/2020	Jeremy Robinson	Partner		17	2.00	\$900.00	\$1,800.00
10/13/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
10/18/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
10/19/2020	Jose Echegaray	Case Managers		17	0.25	\$350.00	\$87.50
10/19/2020	Richard Gluck	Senior Counsel		17	0.25	\$800.00	\$200.00
10/19/2020	Rebecca Boon	Partner		17	2.50	\$875.00	\$2,187.50
10/20/2020	Johanna Pitcairn	Litigation Support		17	2.50	\$400.00	\$1,000.00

10/23/2020	Ryan Dykhous	Associate		17	0.50	\$425.00	\$212.50
10/23/2020	Rebecca Boon	Partner		17	2.50	\$875.00	\$2,187.50
10/24/2020	Stephen Imundo	Senior Staff Attorneys		17	2.75	\$425.00	\$1,168.75
10/25/2020	Lauren Cormier	Staff Attorney		17	7.75	\$375.00	\$2,906.25
10/26/2020	Stephen Imundo	Senior Staff Attorneys		17	8.75	\$425.00	\$3,718.75
10/26/2020	Rebecca Boon	Partner		17	0.75	\$875.00	\$656.25
10/27/2020	Ryan Dykhous	Associate		17	0.25	\$425.00	\$106.25
10/27/2020	Ryan Dykhous	Associate		17	1.25	\$425.00	\$531.25
10/29/2020	Rebecca Boon	Partner		17	1.00	\$875.00	\$875.00
10/30/2020	Ryan Dykhous	Associate		17	1.00	\$425.00	\$425.00
10/30/2020	Rebecca Boon	Partner		17	2.50	\$875.00	\$2,187.50
11/06/2020	Richard Gluck	Senior Counsel		17	1.50	\$800.00	\$1,200.00
11/12/2020	Esinam Quarco	Staff Attorney		17	4.50	\$400.00	\$1,800.00
11/16/2020	Richard Gluck	Senior Counsel		17	0.25	\$800.00	\$200.00
11/16/2020	Stephen Imundo	Senior Staff Attorneys		17	2.25	\$425.00	\$956.25
11/17/2020	Stephen Imundo	Senior Staff Attorneys		17	3.75	\$425.00	\$1,593.75
11/20/2020	Stephen Imundo	Senior Staff Attorneys		17	1.00	\$425.00	\$425.00
11/23/2020	Johanna Pitcairn	Litigation Support		17	1.00	\$400.00	\$400.00
11/30/2020	Johanna Pitcairn	Litigation Support		17	1.50	\$400.00	\$600.00
12/07/2020	Johanna Pitcairn	Litigation Support		17	2.00	\$400.00	\$800.00
12/15/2020	Ryan Dykhous	Associate		17	0.75	\$425.00	\$318.75
12/15/2020	Ryan Dykhous	Associate		17	0.50	\$425.00	\$212.50
12/17/2020	Richard Gluck	Senior Counsel		17	1.00	\$800.00	\$800.00
12/18/2020	Johanna Pitcairn	Litigation Support		17	1.50	\$400.00	\$600.00
12/18/2020	Richard Gluck	Senior Counsel		17	0.50	\$800.00	\$400.00
01/13/2021	Andrew Boruch	Senior Staff Attorneys		17	4.25	\$425.00	\$1,806.25
01/15/2021	Jed Koslow	Staff Attorney		17	4.25	\$400.00	\$1,700.00

01/23/2021	Stephen Imundo	Senior Staff Attorneys		17	1.00	\$425.00	\$425.00
01/29/2021	Erick Ladson	Staff Attorney		17	8.00	\$400.00	\$3,200.00
01/30/2021	Addison F. Golladay	Staff Attorney		17	4.00	\$400.00	\$1,600.00
02/01/2021	Brian Chau	Senior Staff Attorneys		17	8.00	\$425.00	\$3,400.00
02/01/2021	Erick Ladson	Staff Attorney		17	4.00	\$400.00	\$1,600.00
02/02/2021	Erick Ladson	Staff Attorney		17	4.00	\$400.00	\$1,600.00
				TOTALS FOR PROJECT #17:		371.00	\$167,187.50

Project #18: Meet & Confers with Defendants Concerning Discovery. As set forth below, Lead Counsel spent a total of 90.75 hours with a lodestar of \$63,500.00 engaged in formal and informal Meet and Confers and other discussions with Defendants concerning a wide range of discovery issues, such as the scope of Defendants' production in response to Lead Plaintiff's document requests as well as limits on fact depositions.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
12/30/2019	Rebecca Boon	Partner		18	3.50	\$875.00	\$3,062.50
12/30/2019	Jeremy Robinson	Partner		18	4.00	\$900.00	\$3,600.00
01/02/2020	Salvatore Graziano	Partner		18	0.50	\$1,150.00	\$575.00
01/14/2020	Salvatore Graziano	Partner		18	0.25	\$1,150.00	\$287.50
01/21/2020	Rebecca Boon	Partner		18	1.50	\$875.00	\$1,312.50
01/21/2020	Ryan Dykhous	Associate		18	1.50	\$425.00	\$637.50
01/22/2020	Rebecca Boon	Partner		18	1.50	\$875.00	\$1,312.50
01/22/2020	Jeremy Robinson	Partner		18	2.00	\$900.00	\$1,800.00
01/22/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00
01/28/2020	Rebecca Boon	Partner		18	1.00	\$875.00	\$875.00
02/03/2020	Ryan Dykhous	Associate		18	0.50	\$425.00	\$212.50
02/03/2020	Rebecca Boon	Partner		18	0.50	\$875.00	\$437.50
02/12/2020	Ryan Dykhous	Associate		18	0.75	\$425.00	\$318.75
02/19/2020	Ryan Dykhous	Associate		18	0.50	\$425.00	\$212.50
02/21/2020	Jeremy Robinson	Partner		18	2.00	\$900.00	\$1,800.00
02/21/2020	Ryan Dykhous	Associate		18	1.50	\$425.00	\$637.50
02/24/2020	Ryan Dykhous	Associate		18	0.25	\$425.00	\$106.25
03/04/2020	Ryan Dykhous	Associate		18	0.50	\$425.00	\$212.50
03/05/2020	Rebecca Boon	Partner		18	2.00	\$875.00	\$1,750.00
03/09/2020	Ryan Dykhous	Associate		18	1.25	\$425.00	\$531.25
03/12/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00

03/19/2020	Jeremy Robinson	Partner		18	2.00	\$900.00	\$1,800.00
03/19/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00
03/25/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00
03/27/2020	Jeremy Robinson	Partner		18	1.50	\$900.00	\$1,350.00
03/27/2020	Ryan Dykhous	Associate		18	1.75	\$425.00	\$743.75
03/27/2020	Rebecca Boon	Partner		18	1.00	\$875.00	\$875.00
04/06/2020	Jeremy Robinson	Partner		18	2.00	\$900.00	\$1,800.00
04/06/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00
04/06/2020	Rebecca Boon	Partner		18	1.50	\$875.00	\$1,312.50
04/17/2020	Ryan Dykhous	Associate		18	2.50	\$425.00	\$1,062.50
04/17/2020	Rebecca Boon	Partner		18	1.00	\$875.00	\$875.00
05/01/2020	Ryan Dykhous	Associate		18	1.50	\$425.00	\$637.50
05/01/2020	Jeremy Robinson	Partner		18	2.00	\$900.00	\$1,800.00
05/01/2020	Rebecca Boon	Partner		18	1.00	\$875.00	\$875.00
05/05/2020	Ryan Dykhous	Associate		18	0.75	\$425.00	\$318.75
05/05/2020	Ryan Dykhous	Associate		18	0.50	\$425.00	\$212.50
05/07/2020	Ryan Dykhous	Associate		18	2.50	\$425.00	\$1,062.50
05/07/2020	Jeremy Robinson	Partner		18	1.50	\$900.00	\$1,350.00
05/07/2020	Rebecca Boon	Partner		18	2.00	\$875.00	\$1,750.00
05/19/2020	Ryan Dykhous	Associate		18	0.75	\$425.00	\$318.75
05/19/2020	Jeremy Robinson	Partner		18	1.00	\$900.00	\$900.00
05/19/2020	Rebecca Boon	Partner		18	0.75	\$875.00	\$656.25
05/21/2020	Jeremy Robinson	Partner		18	1.00	\$900.00	\$900.00
06/16/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00
06/16/2020	Jeremy Robinson	Partner		18	1.00	\$900.00	\$900.00
06/17/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00
06/29/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00
06/29/2020	Jeremy Robinson	Partner		18	4.00	\$900.00	\$3,600.00
07/13/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00
07/13/2020	Jeremy Robinson	Partner		18	2.50	\$900.00	\$2,250.00
07/13/2020	Rebecca Boon	Partner		18	1.00	\$875.00	\$875.00
07/15/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00
07/20/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00

07/20/2020	Jeremy Robinson	Partner		18	2.00	\$900.00	\$1,800.00
07/22/2020	Ryan Dykhous	Associate		18	1.25	\$425.00	\$531.25
07/23/2020	Ryan Dykhous	Associate		18	0.75	\$425.00	\$318.75
07/23/2020	Ryan Dykhous	Associate		18	0.75	\$425.00	\$318.75
07/23/2020	Ryan Dykhous	Associate		18	0.50	\$425.00	\$212.50
07/23/2020	Jeremy Robinson	Partner		18	2.00	\$900.00	\$1,800.00
08/27/2020	Ryan Dykhous	Associate		18	0.75	\$425.00	\$318.75
10/20/2020	Richard Gluck	Senior Counsel		18	1.00	\$800.00	\$800.00
11/05/2020	Richard Gluck	Senior Counsel		18	1.25	\$800.00	\$1,000.00
11/05/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00
11/23/2020	Ryan Dykhous	Associate		18	1.75	\$425.00	\$743.75
12/09/2020	Richard Gluck	Senior Counsel		18	1.25	\$800.00	\$1,000.00
12/09/2020	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00
12/17/2020	Richard Gluck	Senior Counsel		18	0.25	\$800.00	\$200.00
12/29/2020	Richard Gluck	Senior Counsel		18	0.25	\$800.00	\$200.00
01/05/2021	Richard Gluck	Senior Counsel		18	0.50	\$800.00	\$400.00
01/05/2021	Ryan Dykhous	Associate		18	1.00	\$425.00	\$425.00
TOTALS FOR PROJECT #18:					90.75		\$63,500.00

Project #19: Motion to Compel (May 21, 2020). On May 21, 2020, Lead Plaintiff filed a letter motion seeking to compel production of Symantec's production of documents to SEC, Symantec's database of documents collected and reviewed in connection with its internal Audit Committee investigation, and certain search terms related to the revenue recognition allegations sustained by the Court. Lead Counsel spent a total of 152.75 hours with a lodestar of \$92,931.25 in researching and drafting the motion, conferring with Defendants in advance of the motion and preparing for and arguing the motion to compel itself.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
03/25/2020	Ryan Dykhous	Associate		19	2.75	\$425.00	\$1,168.75
03/26/2020	Ryan Dykhous	Associate		19	1.25	\$425.00	\$531.25
03/30/2020	Mahiri Buffong	Managing Clerk		19	1.00	\$375.00	\$375.00
03/30/2020	Ryan Dykhous	Associate		19	2.75	\$425.00	\$1,168.75

03/30/2020	Ryan Dykhous	Associate		19	2.50	\$425.00	\$1,062.50
04/01/2020	Ryan Dykhous	Associate		19	1.75	\$425.00	\$743.75
04/02/2020	Ryan Dykhous	Associate		19	2.75	\$425.00	\$1,168.75
04/03/2020	Ryan Dykhous	Associate		19	3.50	\$425.00	\$1,487.50
04/05/2020	Ryan Dykhous	Associate		19	2.25	\$425.00	\$956.25
04/06/2020	Ryan Dykhous	Associate		19	4.75	\$425.00	\$2,018.75
04/09/2020	Ryan Dykhous	Associate		19	1.75	\$425.00	\$743.75
04/10/2020	Ryan Dykhous	Associate		19	1.50	\$425.00	\$637.50
04/13/2020	Ryan Dykhous	Associate		19	5.00	\$425.00	\$2,125.00
04/14/2020	Ryan Dykhous	Associate		19	1.25	\$425.00	\$531.25
04/23/2020	Ryan Dykhous	Associate		19	1.25	\$425.00	\$531.25
04/24/2020	Ryan Dykhous	Associate		19	1.50	\$425.00	\$637.50
04/30/2020	Ryan Dykhous	Associate		19	2.00	\$425.00	\$850.00
05/01/2020	Ryan Dykhous	Associate		19	2.25	\$425.00	\$956.25
05/06/2020	Ryan Dykhous	Associate		19	3.00	\$425.00	\$1,275.00
05/07/2020	Lauren Cormier	Staff Attorney		19	8.00	\$375.00	\$3,000.00
05/08/2020	Ryan Dykhous	Associate		19	2.25	\$425.00	\$956.25
05/08/2020	Ryan Dykhous	Associate		19	1.25	\$425.00	\$531.25
05/11/2020	Ryan Dykhous	Associate		19	1.25	\$425.00	\$531.25
05/13/2020	Mahiri Buffong	Managing Clerk		19	1.00	\$375.00	\$375.00
05/15/2020	Lauren Cormier	Staff Attorney		19	8.00	\$375.00	\$3,000.00
05/18/2020	Jeremy Robinson	Partner		19	4.00	\$900.00	\$3,600.00
05/19/2020	Ryan Dykhous	Associate		19	2.00	\$425.00	\$850.00
05/19/2020	Jeremy Robinson	Partner		19	3.50	\$900.00	\$3,150.00
05/19/2020	Rebecca Boon	Partner		19	0.50	\$875.00	\$437.50
05/20/2020	Ryan Dykhous	Associate		19	2.00	\$425.00	\$850.00
05/20/2020	Jeremy Robinson	Partner		19	4.50	\$900.00	\$4,050.00
05/20/2020	Rebecca Boon	Partner		19	2.00	\$875.00	\$1,750.00
05/21/2020	Jose Echegaray	Case Managers		19	0.25	\$350.00	\$87.50

05/21/2020	Jose Echegaray	Case Managers		19	8.00	\$350.00	\$2,800.00
05/21/2020	Mahiri Buffong	Managing Clerk		19	1.25	\$375.00	\$468.75
05/21/2020	Ryan Dykhous	Associate		19	4.25	\$425.00	\$1,806.25
05/21/2020	Jeremy Robinson	Partner		19	9.00	\$900.00	\$8,100.00
05/21/2020	Salvatore Graziano	Partner		19	0.50	\$1,150.00	\$575.00
05/21/2020	Rebecca Boon	Partner		19	1.50	\$875.00	\$1,312.50
05/22/2020	Jeremy Robinson	Partner		19	3.50	\$900.00	\$3,150.00
05/22/2020	Rebecca Boon	Partner		19	0.75	\$875.00	\$656.25
05/23/2020	Jeremy Robinson	Partner		19	3.50	\$900.00	\$3,150.00
05/24/2020	Jeremy Robinson	Partner		19	6.50	\$900.00	\$5,850.00
05/25/2020	Jeremy Robinson	Partner		19	5.50	\$900.00	\$4,950.00
05/26/2020	Justin Ratliff	Staff Attorney		19	2.50	\$350.00	\$875.00
05/26/2020	Ryan Dykhous	Associate		19	2.75	\$425.00	\$1,168.75
05/26/2020	Jeremy Robinson	Partner		19	9.50	\$900.00	\$8,550.00
05/26/2020	Rebecca Boon	Partner		19	1.00	\$875.00	\$875.00
05/27/2020	Ryan Dykhous	Associate		19	1.25	\$425.00	\$531.25
05/27/2020	Jeremy Robinson	Partner		19	3.75	\$900.00	\$3,375.00
05/27/2020	Salvatore Graziano	Partner		19	1.50	\$1,150.00	\$1,725.00
05/27/2020	Rebecca Boon	Partner		19	1.00	\$875.00	\$875.00
			TOTALS FOR PROJECT #19:		152.75		\$92,931.25

Project #20: Motion to Certify the Class (January 17, 2020). On January 17, 2020, Lead Plaintiff filed its initial motion for certification of the Class. Lead Counsel spent a total of 151.25 hours with a lodestar of \$98,375.00 in researching and drafting the motion and accompanying documents. The work, the details of which are broken down chronologically below, included legal research, drafting the motion, preparing supporting declarations from SEB and Lead Counsel, and reviewing and working on the expert report of Michael Hartzmark on market efficiency and a common methodology for classwide damages that was filed with the motion.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/20/2019	Ryan Dykhous	Associate		20	0.75	\$425.00	\$318.75
12/10/2019	Jeremy Robinson	Partner		20	1.50	\$900.00	\$1,350.00
12/11/2019	Ryan Dykhous	Associate		20	2.25	\$425.00	\$956.25
12/18/2019	Ryan Dykhous	Associate		20	1.50	\$425.00	\$637.50

12/30/2019	Julia Tebor	Associate		20	6.50	\$575.00	\$3,737.50
12/31/2019	Ryan Dykhous	Associate		20	1.25	\$425.00	\$531.25
01/01/2020	Ryan Dykhous	Associate		20	2.25	\$425.00	\$956.25
01/02/2020	Ryan Dykhous	Associate		20	3.50	\$425.00	\$1,487.50
01/03/2020	Ryan Dykhous	Associate		20	1.50	\$425.00	\$637.50
01/06/2020	Ryan Dykhous	Associate		20	0.25	\$425.00	\$106.25
01/06/2020	Ryan Dykhous	Associate		20	1.50	\$425.00	\$637.50
01/07/2020	Julia Tebor	Associate		20	4.50	\$575.00	\$2,587.50
01/07/2020	Ryan Dykhous	Associate		20	1.75	\$425.00	\$743.75
01/08/2020	Rebecca Boon	Partner		20	1.50	\$875.00	\$1,312.50
01/08/2020	Julia Tebor	Associate		20	4.00	\$575.00	\$2,300.00
01/08/2020	Ryan Dykhous	Associate		20	0.75	\$425.00	\$318.75
01/09/2020	Ryan Dykhous	Associate		20	0.50	\$425.00	\$212.50
01/09/2020	Ryan Dykhous	Associate		20	1.00	\$425.00	\$425.00
01/10/2020	Julia Tebor	Associate		20	4.00	\$575.00	\$2,300.00
01/11/2020	Jeremy Robinson	Partner		20	5.00	\$900.00	\$4,500.00
01/12/2020	Jeremy Robinson	Partner		20	6.00	\$900.00	\$5,400.00
01/12/2020	Ryan Dykhous	Associate		20	1.25	\$425.00	\$531.25
01/13/2020	Jeremy Robinson	Partner		20	9.00	\$900.00	\$8,100.00
01/13/2020	Julia Tebor	Associate		20	5.00	\$575.00	\$2,875.00
01/13/2020	Ryan Dykhous	Associate		20	1.25	\$425.00	\$531.25
01/13/2020	Ryan Dykhous	Associate		20	1.25	\$425.00	\$531.25
01/13/2020	Salvatore Graziano	Partner		20	1.00	\$1,150.00	\$1,150.00
01/14/2020	Jeremy Robinson	Partner		20	12.00	\$900.00	\$10,800.00
01/14/2020	Jose Echegaray	Case Managers		20	1.00	\$350.00	\$350.00
01/14/2020	Preya Rodriguez	Paralegal		20	6.50	\$325.00	\$2,112.50
01/14/2020	Ryan Dykhous	Associate		20	3.75	\$425.00	\$1,593.75
01/15/2020	Rebecca Boon	Partner		20	2.00	\$875.00	\$1,750.00
01/15/2020	Jeremy Robinson	Partner		20	7.00	\$900.00	\$6,300.00
01/15/2020	Julia Tebor	Associate		20	3.00	\$575.00	\$1,725.00
01/15/2020	Ryan Dykhous	Associate		20	2.75	\$425.00	\$1,168.75
01/15/2020	Salvatore Graziano	Partner		20	0.75	\$1,150.00	\$862.50
01/16/2020	Jeremy Robinson	Partner		20	12.00	\$900.00	\$10,800.00
01/16/2020	Julia Tebor	Associate		20	4.00	\$575.00	\$2,300.00

01/16/2020	Michelle Leung	Case Managers		20	1.50	\$350.00	\$525.00
01/16/2020	Ryan Dykhous	Associate		20	4.50	\$425.00	\$1,912.50
01/16/2020	Salvatore Graziano	Partner		20	1.00	\$1,150.00	\$1,150.00
01/17/2020	Jeremy Robinson	Partner		20	3.00	\$900.00	\$2,700.00
01/17/2020	Julia Tebor	Associate		20	5.00	\$575.00	\$2,875.00
01/17/2020	Mahiri Buffong	Managing Clerk		20	0.50	\$375.00	\$187.50
01/17/2020	Michelle Leung	Case Managers		20	5.00	\$350.00	\$1,750.00
01/17/2020	Ryan Dykhous	Associate		20	5.50	\$425.00	\$2,337.50
			TOTALS FOR PROJECT #20:		151.25		\$98,375.00

Project #21: Class Certification Discovery (January 17, 2020). Lead Counsel spent a total of 392.5 hours with a lodestar of \$277,106.25 on matters related to class-certification discovery, other than defending the deposition of Lead Plaintiff SEB (see Project #22 below). This work, the details of which are broken down chronologically below, included preparing for and defending the deposition of Lead Plaintiff's market efficiency expert Michael Hartzmark, and preparing for and taking the deposition of Defendants' expert, Douglas Skinner (which included an extensive review of his prior opinions and work product), and related document productions.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
12/10/2019	Jose Echegaray	Case Managers		21	1.25	\$350.00	\$437.50
01/21/2020	Jeremy Robinson	Partner		21	10.00	\$900.00	\$9,000.00
01/21/2020	Ryan Dykhous	Associate		21	1.25	\$425.00	\$531.25
01/22/2020	Jeremy Robinson	Partner		21	7.50	\$900.00	\$6,750.00
01/23/2020	Jeremy Robinson	Partner		21	9.00	\$900.00	\$8,100.00
01/23/2020	Ryan Dykhous	Associate		21	2.00	\$425.00	\$850.00
01/23/2020	Ryan Dykhous	Associate		21	1.75	\$425.00	\$743.75
01/24/2020	Rebecca Boon	Partner		21	2.50	\$875.00	\$2,187.50
01/24/2020	Jeremy Robinson	Partner		21	8.00	\$900.00	\$7,200.00
01/27/2020	Jeremy Robinson	Partner		21	9.00	\$900.00	\$8,100.00
01/28/2020	Jeremy Robinson	Partner		21	9.50	\$900.00	\$8,550.00
01/28/2020	Ryan Dykhous	Associate		21	2.50	\$425.00	\$1,062.50
01/29/2020	Rebecca Boon	Partner		21	0.75	\$875.00	\$656.25

01/29/2020	Jeremy Robinson	Partner		21	8.50	\$900.00	\$7,650.00
01/29/2020	Michelle Leung	Case Managers		21	0.50	\$350.00	\$175.00
01/30/2020	Rebecca Boon	Partner		21	2.50	\$875.00	\$2,187.50
01/30/2020	Jeremy Robinson	Partner		21	10.00	\$900.00	\$9,000.00
01/31/2020	Jeremy Robinson	Partner		21	8.50	\$900.00	\$7,650.00
01/31/2020	Jose Echegaray	Case Managers		21	1.75	\$350.00	\$612.50
01/31/2020	Ryan Dykhhouse	Associate		21	0.75	\$425.00	\$318.75
02/01/2020	Jeremy Robinson	Partner		21	3.00	\$900.00	\$2,700.00
02/02/2020	Jeremy Robinson	Partner		21	5.00	\$900.00	\$4,500.00
02/03/2020	Jeremy Robinson	Partner		21	5.50	\$900.00	\$4,950.00
02/03/2020	Jeremy Robinson	Partner		21	5.50	\$900.00	\$4,950.00
02/04/2020	Jose Echegaray	Case Managers		21	1.00	\$350.00	\$350.00
02/04/2020	Jeremy Robinson	Partner		21	5.00	\$900.00	\$4,500.00
02/04/2020	Jeremy Robinson	Partner		21	5.00	\$900.00	\$4,500.00
02/05/2020	Jeremy Robinson	Partner		21	5.25	\$900.00	\$4,725.00
02/05/2020	Jeremy Robinson	Partner		21	5.25	\$900.00	\$4,725.00
02/06/2020	Jeremy Robinson	Partner		21	4.00	\$900.00	\$3,600.00
02/06/2020	Jeremy Robinson	Partner		21	4.00	\$900.00	\$3,600.00
02/06/2020	Ryan Dykhhouse	Associate		21	2.00	\$425.00	\$850.00
02/07/2020	Jeremy Robinson	Partner		21	4.00	\$900.00	\$3,600.00
02/07/2020	Ryan Dykhhouse	Associate		21	6.00	\$425.00	\$2,550.00
02/07/2020	Salvatore Graziano	Partner		21	0.50	\$1,150.00	\$575.00
02/14/2020	Jeremy Robinson	Partner		21	7.00	\$900.00	\$6,300.00
02/17/2020	Jeremy Robinson	Partner		21	5.00	\$900.00	\$4,500.00
02/18/2020	Jeremy Robinson	Partner		21	5.00	\$900.00	\$4,500.00
02/18/2020	Stephen Imundo	Senior Staff Attorneys		21	10.50	\$425.00	\$4,462.50
02/19/2020	Jeremy Robinson	Partner		21	6.00	\$900.00	\$5,400.00
02/19/2020	Ryan Dykhhouse	Associate		21	0.50	\$425.00	\$212.50
02/19/2020	Stephen Imundo	Senior Staff Attorneys		21	9.75	\$425.00	\$4,143.75
02/19/2020	Rebecca Boon	Partner		21	1.50	\$875.00	\$1,312.50
02/20/2020	Jeremy Robinson	Partner		21	6.00	\$900.00	\$5,400.00
02/20/2020	Stephen Imundo	Senior Staff Attorneys		21	4.50	\$425.00	\$1,912.50
02/21/2020	Jeremy Robinson	Partner		21	5.00	\$900.00	\$4,500.00

02/21/2020	Stephen Imundo	Senior Staff Attorneys		21	7.75	\$425.00	\$3,293.75
02/22/2020	Stephen Imundo	Senior Staff Attorneys		21	3.00	\$425.00	\$1,275.00
02/23/2020	Stephen Imundo	Senior Staff Attorneys		21	3.75	\$425.00	\$1,593.75
02/24/2020	Jeremy Robinson	Partner		21	5.00	\$900.00	\$4,500.00
02/24/2020	Stephen Imundo	Senior Staff Attorneys		21	8.75	\$425.00	\$3,718.75
02/25/2020	Stephen Imundo	Senior Staff Attorneys		21	12.75	\$425.00	\$5,418.75
02/26/2020	Ryan Dykhous	Associate		21	0.75	\$425.00	\$318.75
02/26/2020	Stephen Imundo	Senior Staff Attorneys		21	11.75	\$425.00	\$4,993.75
02/27/2020	Stephen Imundo	Senior Staff Attorneys		21	12.75	\$425.00	\$5,418.75
02/28/2020	Stephen Imundo	Senior Staff Attorneys		21	9.50	\$425.00	\$4,037.50
03/02/2020	Jose Echegaray	Case Managers		21	1.00	\$350.00	\$350.00
03/02/2020	Jeremy Robinson	Partner		21	8.00	\$900.00	\$7,200.00
03/03/2020	Jose Echegaray	Case Managers		21	1.75	\$350.00	\$612.50
03/03/2020	Stephen Imundo	Senior Staff Attorneys		21	9.25	\$425.00	\$3,931.25
03/03/2020	Jeremy Robinson	Partner		21	10.00	\$900.00	\$9,000.00
03/04/2020	Jose Echegaray	Case Managers		21	3.50	\$350.00	\$1,225.00
03/04/2020	Ryan Dykhous	Associate		21	2.50	\$425.00	\$1,062.50
03/04/2020	Stephen Imundo	Senior Staff Attorneys		21	8.50	\$425.00	\$3,612.50
03/04/2020	Jeremy Robinson	Partner		21	12.00	\$900.00	\$10,800.00
03/05/2020	Jose Echegaray	Case Managers		21	1.50	\$350.00	\$525.00
03/05/2020	Ryan Dykhous	Associate		21	4.00	\$425.00	\$1,700.00
03/05/2020	Ryan Dykhous	Associate		21	2.50	\$425.00	\$1,062.50
03/05/2020	Jeremy Robinson	Partner		21	14.00	\$900.00	\$12,600.00
03/06/2020	Ryan Dykhous	Associate		21	6.00	\$425.00	\$2,550.00
03/06/2020	Jeremy Robinson	Partner		21	12.00	\$900.00	\$10,800.00
03/16/2020	Ryan Dykhous	Associate		21	1.00	\$425.00	\$425.00
				TOTALS FOR PROJECT #21:		392.50	\$277,106.25

Project #22: Defending the Deposition of Caroline Rifall (February 5, 2020). Ms. Rifall is the Head of Legal at SEB. Mr. Rifall served as the corporate representative for the Rule 30(b)(6) deposition of Lead Plaintiff taken by Defendants on February 5, 2020. Lead Counsel spent a total of 130.5 hours preparing Ms. Rifall for and defending the deposition, resulting in \$74,856.25 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing documents Defendants were likely to use at the deposition, meeting with Ms. Rifall to prepare, and over 4.5 hours defending the deposition. Two attorneys from Lead Counsel attended the deposition, the partner who defended the deposition and an associate who assisted. Two associate attorneys attended for the Defendants.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
01/21/2020	Jose Echegaray	Case Managers		22	2.00	\$350.00	\$700.00
01/21/2020	Ryan Dykhous	Associate		22	1.50	\$425.00	\$637.50
01/22/2020	Jose Echegaray	Case Managers		22	2.00	\$350.00	\$700.00
01/22/2020	Ryan Dykhous	Associate		22	0.75	\$425.00	\$318.75
01/23/2020	Rebecca Boon	Partner		22	5.00	\$875.00	\$4,375.00
01/23/2020	Jose Echegaray	Case Managers		22	0.25	\$350.00	\$87.50
01/23/2020	Jose Echegaray	Case Managers		22	1.00	\$350.00	\$350.00
01/24/2020	Rebecca Boon	Partner		22	2.25	\$875.00	\$1,968.75
01/24/2020	Ryan Dykhous	Associate		22	1.25	\$425.00	\$531.25
01/27/2020	Rebecca Boon	Partner		22	3.75	\$875.00	\$3,281.25
01/27/2020	Jose Echegaray	Case Managers		22	4.00	\$350.00	\$1,400.00
01/27/2020	Michelle Leung	Case Managers		22	2.00	\$350.00	\$700.00
01/27/2020	Ryan Dykhous	Associate		22	3.25	\$425.00	\$1,381.25
01/27/2020	Ryan Dykhous	Associate		22	1.50	\$425.00	\$637.50
01/28/2020	Rebecca Boon	Partner		22	6.00	\$875.00	\$5,250.00
01/28/2020	Jose Echegaray	Case Managers		22	5.00	\$350.00	\$1,750.00
01/29/2020	Rebecca Boon	Partner		22	6.75	\$875.00	\$5,906.25
01/29/2020	Jose Echegaray	Case Managers		22	5.75	\$350.00	\$2,012.50
01/29/2020	Ryan Dykhous	Associate		22	3.75	\$425.00	\$1,593.75
01/30/2020	Rebecca Boon	Partner		22	2.50	\$875.00	\$2,187.50
01/30/2020	Jose Echegaray	Case Managers		22	6.00	\$350.00	\$2,100.00
01/30/2020	Ryan Dykhous	Associate		22	1.00	\$425.00	\$425.00
01/30/2020	Ryan Dykhous	Associate		22	4.00	\$425.00	\$1,700.00
01/31/2020	Rebecca Boon	Partner		22	5.50	\$875.00	\$4,812.50
01/31/2020	Jose Echegaray	Case Managers		22	3.50	\$350.00	\$1,225.00

01/31/2020	Ryan Dykhous	Associate		22	2.50	\$425.00	\$1,062.50
01/31/2020	Ryan Dykhous	Associate		22	2.25	\$425.00	\$956.25
02/02/2020	Rebecca Boon	Partner		22	1.50	\$875.00	\$1,312.50
02/03/2020	Rebecca Boon	Partner		22	2.50	\$875.00	\$2,187.50
02/03/2020	Jose Echegaray	Case Managers		22	2.50	\$350.00	\$875.00
02/03/2020	Ryan Dykhous	Associate		22	1.25	\$425.00	\$531.25
02/04/2020	Rebecca Boon	Partner		22	6.50	\$875.00	\$5,687.50
02/04/2020	Jose Echegaray	Case Managers		22	2.75	\$350.00	\$962.50
02/04/2020	Ryan Dykhous	Associate		22	6.00	\$425.00	\$2,550.00
02/04/2020	Ryan Dykhous	Associate		22	0.75	\$425.00	\$318.75
02/04/2020	Salvatore Graziano	Partner		22	0.50	\$1,150.00	\$575.00
02/05/2020	Rebecca Boon	Partner		22	6.50	\$875.00	\$5,687.50
02/05/2020	Jose Echegaray	Case Managers		22	2.00	\$350.00	\$700.00
02/05/2020	Ryan Dykhous	Associate		22	8.00	\$425.00	\$3,400.00
02/10/2020	Ryan Dykhous	Associate		22	2.00	\$425.00	\$850.00
02/14/2020	Ryan Dykhous	Associate		22	2.25	\$425.00	\$956.25
02/18/2020	Ryan Dykhous	Associate		22	0.50	\$425.00	\$212.50
				TOTALS FOR PROJECT #22:		130.50	\$74,856.25

Project #23: Class Certification Reply (March 13, 2020). Lead Plaintiff filed its reply papers in support of the motion for certification of the Class on March 13, 2020. Lead Counsel spent a total of 196.5 hours with a lodestar of \$113,568.75 on this project. This work, the details of which are broken down chronologically below, included reviewing and analyzing Defendants' opposition papers, legal research on relevant issues, drafting the reply brief, assisting in the preparation of a reply expert report from Michael Hartzmark, and preparing for possible oral argument on the motion.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
01/23/2020	Salvatore Graziano	Partner		23	0.50	\$1,150.00	\$575.00
02/14/2020	Rebecca Boon	Partner		23	0.50	\$875.00	\$437.50
02/14/2020	Ryan Dykhous	Associate		23	1.25	\$425.00	\$531.25
02/15/2020	Jose Echegaray	Case Managers		23	2.50	\$350.00	\$875.00
02/15/2020	Ryan Dykhous	Associate		23	2.00	\$425.00	\$850.00
02/18/2020	Ryan Dykhous	Associate		23	1.75	\$425.00	\$743.75
02/18/2020	Salvatore Graziano	Partner		23	1.00	\$1,150.00	\$1,150.00

02/19/2020	Jose Echegaray	Case Managers		23	1.00	\$350.00	\$350.00
02/19/2020	Michelle Leung	Case Managers		23	1.75	\$350.00	\$612.50
02/19/2020	Ryan Dykhous	Associate		23	1.25	\$425.00	\$531.25
02/20/2020	Ryan Dykhous	Associate		23	2.25	\$425.00	\$956.25
02/20/2020	Ryan Dykhous	Associate		23	0.75	\$425.00	\$318.75
02/20/2020	Ryan Dykhous	Associate		23	0.75	\$425.00	\$318.75
02/21/2020	Ryan Dykhous	Associate		23	0.50	\$425.00	\$212.50
02/24/2020	Ryan Dykhous	Associate		23	2.50	\$425.00	\$1,062.50
02/25/2020	Rebecca Boon	Partner		23	0.50	\$875.00	\$437.50
02/25/2020	Ryan Dykhous	Associate		23	3.50	\$425.00	\$1,487.50
02/26/2020	Ryan Dykhous	Associate		23	4.75	\$425.00	\$2,018.75
02/27/2020	Ryan Dykhous	Associate		23	1.25	\$425.00	\$531.25
02/27/2020	Ryan Dykhous	Associate		23	3.75	\$425.00	\$1,593.75
02/28/2020	Ryan Dykhous	Associate		23	2.75	\$425.00	\$1,168.75
03/02/2020	Ryan Dykhous	Associate		23	3.50	\$425.00	\$1,487.50
03/02/2020	Salvatore Graziano	Partner		23	0.25	\$1,150.00	\$287.50
03/03/2020	Ryan Dykhous	Associate		23	6.25	\$425.00	\$2,656.25
03/04/2020	Ryan Dykhous	Associate		23	4.50	\$425.00	\$1,912.50
03/05/2020	Ryan Dykhous	Associate		23	2.50	\$425.00	\$1,062.50
03/07/2020	Ryan Dykhous	Associate		23	4.50	\$425.00	\$1,912.50
03/07/2020	Jeremy Robinson	Partner		23	5.00	\$900.00	\$4,500.00
03/08/2020	Jeremy Robinson	Partner		23	11.00	\$900.00	\$9,900.00
03/09/2020	Jeremy Robinson	Partner		23	12.00	\$900.00	\$10,800.00
03/10/2020	Rebecca Boon	Partner		23	1.50	\$875.00	\$1,312.50
03/10/2020	Jose Echegaray	Case Managers		23	0.75	\$350.00	\$262.50
03/10/2020	Jose Echegaray	Case Managers		23	2.50	\$350.00	\$875.00
03/10/2020	Jeremy Robinson	Partner		23	9.00	\$900.00	\$8,100.00
03/10/2020	Salvatore Graziano	Partner		23	1.00	\$1,150.00	\$1,150.00
03/11/2020	Jose Echegaray	Case Managers		23	2.00	\$350.00	\$700.00
03/11/2020	Jose Echegaray	Case Managers		23	5.75	\$350.00	\$2,012.50

03/11/2020	Ryan Dykhous	Associate		23	1.00	\$425.00	\$425.00
03/11/2020	Ryan Dykhous	Associate		23	2.25	\$425.00	\$956.25
03/11/2020	Ryan Dykhous	Associate		23	1.00	\$425.00	\$425.00
03/11/2020	Ryan Dykhous	Associate		23	1.75	\$425.00	\$743.75
03/12/2020	Jose Echegaray	Case Managers		23	7.50	\$350.00	\$2,625.00
03/12/2020	Preya Rodriguez	Paralegal		23	2.50	\$325.00	\$812.50
03/12/2020	Ryan Dykhous	Associate		23	4.25	\$425.00	\$1,806.25
03/12/2020	Jeremy Robinson	Partner		23	14.00	\$900.00	\$12,600.00
03/13/2020	Jose Echegaray	Case Managers		23	7.50	\$350.00	\$2,625.00
03/13/2020	Jeremy Robinson	Partner		23	11.00	\$900.00	\$9,900.00
03/13/2020	Preya Rodriguez	Paralegal		23	3.25	\$325.00	\$1,056.25
03/13/2020	Ryan Dykhous	Associate		23	6.25	\$425.00	\$2,656.25
03/16/2020	Jose Echegaray	Case Managers		23	1.00	\$350.00	\$350.00
03/18/2020	Ryan Dykhous	Associate		23	1.50	\$425.00	\$637.50
03/18/2020	Ryan Dykhous	Associate		23	1.75	\$425.00	\$743.75
03/18/2020	Salvatore Graziano	Partner		23	0.50	\$1,150.00	\$575.00
03/19/2020	Ryan Dykhous	Associate		23	1.25	\$425.00	\$531.25
03/19/2020	Salvatore Graziano	Partner		23	0.50	\$1,150.00	\$575.00
03/20/2020	Ryan Dykhous	Associate		23	2.75	\$425.00	\$1,168.75
03/21/2020	Ryan Dykhous	Associate		23	2.50	\$425.00	\$1,062.50
03/22/2020	Ryan Dykhous	Associate		23	1.00	\$425.00	\$425.00
03/23/2020	Jose Echegaray	Case Managers		23	7.75	\$350.00	\$2,712.50
03/23/2020	Preya Rodriguez	Paralegal		23	0.25	\$325.00	\$81.25
03/23/2020	Ryan Dykhous	Associate		23	4.25	\$425.00	\$1,806.25
03/23/2020	Salvatore Graziano	Partner		23	0.50	\$1,150.00	\$575.00

				TOTALS FOR PROJECT #23:	196.50		\$113,568.75
Project #24: Class Certification Hearing Preparation. As set forth below, Lead Counsel spent 31.75 hours with a lodestar of \$28,887.50 preparing for oral argument on Lead Plaintiff's motion for class certification. Although the motion was ultimately decided without argument, a hearing had been scheduled and may have occurred on April 9, 2020. As such, Lead Counsel dedicated this time to reviewing the Parties' arguments and legal authorities and preparing for the hearing in anticipation of oral argument.							
Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
04/03/2020	Jeremy Robinson	Partner		24	4.50	\$900.00	\$4,050.00
04/04/2020	Jeremy Robinson	Partner		24	5.00	\$900.00	\$4,500.00
04/05/2020	Jeremy Robinson	Partner		24	6.00	\$900.00	\$5,400.00
04/06/2020	Jeremy Robinson	Partner		24	7.00	\$900.00	\$6,300.00
04/07/2020	Jeremy Robinson	Partner		24	8.00	\$900.00	\$7,200.00
04/07/2020	Salvatore Graziano	Partner		24	0.75	\$1,150.00	\$862.50
04/08/2020	Salvatore Graziano	Partner		24	0.50	\$1,150.00	\$575.00
			TOTALS FOR PROJECT #24:		31.75		\$28,887.50
Project #25: Class Certification Notice. Following the Court's order certifying the Class, Lead Counsel drafted the Notice of Pendency of Class Action ("Class Notice") and oversaw its mailing to potential Class Members. Lead Counsel spent a total of 67.25 hours with a lodestar of \$48,593.75 on this project. This work, the details of which are broken down chronologically below, included drafting the proposed Class Notice and summary publication notice, conferring with Defendants to obtain their agreement on this document; drafting and presenting to the Court a proposed Stipulation and Order approving the Notice; selecting a Notice Administrator to conduct the mailing; overseeing the work of the Notice Administrator in conducting the mailing; reviewing and compiling the requests for exclusion from the Class received; and overseeing the Notice Administrator's production of a declaration summarizing the notice mailing and the requests for exclusion received (filed on September 16, 2020).							
Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
05/08/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
05/08/2020	Ryan Dykhous	Associate		25	1.50	\$425.00	\$637.50
05/11/2020	David Duncan	Senior Counsel		25	1.00	\$775.00	\$775.00
05/11/2020	Ryan Dykhous	Associate		25	0.75	\$425.00	\$318.75
05/11/2020	Salvatore Graziano	Partner		25	0.50	\$1,150.00	\$575.00
05/11/2020	Rebecca Boon	Partner		25	0.50	\$875.00	\$437.50
05/12/2020	David Duncan	Senior Counsel		25	0.75	\$775.00	\$581.25
05/12/2020	Ryan Dykhous	Associate		25	2.50	\$425.00	\$1,062.50
05/13/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
05/13/2020	Jose Echegaray	Case Managers		25	0.25	\$350.00	\$87.50
05/13/2020	Ryan Dykhous	Associate		25	4.00	\$425.00	\$1,700.00
05/14/2020	Jeremy Robinson	Partner		25	1.00	\$900.00	\$900.00

05/14/2020	David Duncan	Senior Counsel		25	4.00	\$775.00	\$3,100.00
05/14/2020	Rebecca Boon	Partner		25	1.50	\$875.00	\$1,312.50
05/15/2020	Jeremy Robinson	Partner		25	1.50	\$900.00	\$1,350.00
05/15/2020	David Duncan	Senior Counsel		25	7.00	\$775.00	\$5,425.00
05/15/2020	Ryan Dykhous	Associate		25	1.25	\$425.00	\$531.25
05/18/2020	Jeremy Robinson	Partner		25	4.00	\$900.00	\$3,600.00
05/18/2020	David Duncan	Senior Counsel		25	2.50	\$775.00	\$1,937.50
05/18/2020	Ryan Dykhous	Associate		25	1.50	\$425.00	\$637.50
05/18/2020	Salvatore Graziano	Partner		25	0.75	\$1,150.00	\$862.50
05/19/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
05/19/2020	Rebecca Boon	Partner		25	0.50	\$875.00	\$437.50
05/20/2020	Jeremy Robinson	Partner		25	1.00	\$900.00	\$900.00
05/21/2020	David Duncan	Senior Counsel		25	3.00	\$775.00	\$2,325.00
05/22/2020	David Duncan	Senior Counsel		25	3.00	\$775.00	\$2,325.00
05/22/2020	Rebecca Boon	Partner		25	0.75	\$875.00	\$656.25
05/26/2020	David Duncan	Senior Counsel		25	1.75	\$775.00	\$1,356.25
05/27/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
05/28/2020	David Duncan	Senior Counsel		25	1.25	\$775.00	\$968.75
06/01/2020	David Duncan	Senior Counsel		25	1.00	\$775.00	\$775.00
06/02/2020	David Duncan	Senior Counsel		25	0.50	\$775.00	\$387.50
06/03/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
06/08/2020	David Duncan	Senior Counsel		25	1.25	\$775.00	\$968.75
06/10/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75

06/19/2020	David Duncan	Senior Counsel		25	0.75	\$775.00	\$581.25
06/22/2020	David Duncan	Senior Counsel		25	0.50	\$775.00	\$387.50
06/26/2020	David Duncan	Senior Counsel		25	0.50	\$775.00	\$387.50
07/08/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
07/17/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
07/20/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
07/29/2020	David Duncan	Senior Counsel		25	0.50	\$775.00	\$387.50
07/30/2020	David Duncan	Senior Counsel		25	0.50	\$775.00	\$387.50
08/07/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
08/14/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
08/27/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
08/28/2020	David Duncan	Senior Counsel		25	0.50	\$775.00	\$387.50
08/28/2020	Salvatore Graziano	Partner		25	0.50	\$1,150.00	\$575.00
08/31/2020	David Duncan	Senior Counsel		25	0.50	\$775.00	\$387.50
09/02/2020	David Duncan	Senior Counsel		25	0.50	\$775.00	\$387.50
09/04/2020	David Duncan	Senior Counsel		25	0.50	\$775.00	\$387.50
09/06/2020	Ryan Dykhous	Associate		25	3.75	\$425.00	\$1,593.75
09/08/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
09/11/2020	David Duncan	Senior Counsel		25	0.50	\$775.00	\$387.50
09/14/2020	David Duncan	Senior Counsel		25	1.25	\$775.00	\$968.75
09/15/2020	David Duncan	Senior Counsel		25	2.25	\$775.00	\$1,743.75
09/16/2020	David Duncan	Senior Counsel		25	0.25	\$775.00	\$193.75
			TOTALS FOR PROJECT #25:		67.25		\$48,593.75

Project #26: Initial Settlement Conference (September 14, 2020). In February 2020, the Court referred the Action to Judge Ryu to oversee settlement negotiations. Following a preliminary conference in March 2020, the settlement conference with Judge Ryu was initially scheduled for June 2020, then July 2020, and ultimately held on September 14, 2020 by videoconference (due to the COVID-19 pandemic). Lead Counsel spent a total of 420.75 hours with a lodestar of \$282,431.25 in connection with the initial settlement conference. This work, the details of which are broken down chronologically below, included preparing for and attending the initial scheduling conference with Judge Ryu, drafting a memo to the client and other client communications concerning Lead Counsel's recommendations for settlement and settlement authority, numerous communications with Defendants' Counsel related to possible settlement, drafting a detailed mediation brief for submission to Judge Ryu, as well as a private submission for Judge Ryu's eyes only, preparing presentation materials for the settlement conference, and participating in the settlement conference, as well as follow-on negotiations immediately after the conference.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
03/04/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
03/09/2020	Rebecca Boon	Partner		26	1.00	\$875.00	\$875.00
03/10/2020	Rebecca Boon	Partner		26	1.50	\$875.00	\$1,312.50
03/10/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
03/11/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
03/11/2020	Max Berger	Partner		26	5.00	\$1,300.00	\$6,500.00
03/12/2020	Jose Echegaray	Case Managers		26	2.00	\$350.00	\$700.00
03/12/2020	Ryan Dykhhouse	Associate		26	2.25	\$425.00	\$956.25
03/12/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
03/23/2020	Ryan Dykhhouse	Associate		26	0.75	\$425.00	\$318.75
03/23/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
03/23/2020	Max Berger	Partner		26	3.00	\$1,300.00	\$3,900.00
04/15/2020	Max Berger	Partner		26	4.00	\$1,300.00	\$5,200.00
05/18/2020	Ryan Dykhhouse	Associate		26	0.75	\$425.00	\$318.75
06/09/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
06/11/2020	Stephen Imundo	Senior Staff Attorneys		26	4.25	\$425.00	\$1,806.25
06/12/2020	Stephen Imundo	Senior Staff Attorneys		26	2.50	\$425.00	\$1,062.50
06/12/2020	Max Berger	Partner		26	4.00	\$1,300.00	\$5,200.00
06/15/2020	Ryan Dykhhouse	Associate		26	1.00	\$425.00	\$425.00
06/15/2020	Stephen Imundo	Senior Staff Attorneys		26	5.25	\$425.00	\$2,231.25
06/15/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
06/15/2020	Max Berger	Partner		26	3.00	\$1,300.00	\$3,900.00
06/16/2020	Addison F. Golladay	Staff Attorney		26	4.25	\$400.00	\$1,700.00
06/16/2020	Lauren Cormier	Staff Attorney		26	4.00	\$375.00	\$1,500.00
06/16/2020	Stephen Imundo	Senior Staff Attorneys		26	5.75	\$425.00	\$2,443.75
06/17/2020	Addison F. Golladay	Staff Attorney		26	10.00	\$400.00	\$4,000.00

06/17/2020	Lauren Cormier	Staff Attorney		26	8.00	\$375.00	\$3,000.00
06/18/2020	Addison F. Golladay	Staff Attorney		26	10.00	\$400.00	\$4,000.00
06/18/2020	Lauren Cormier	Staff Attorney		26	8.00	\$375.00	\$3,000.00
06/20/2020	Addison F. Golladay	Staff Attorney		26	2.50	\$400.00	\$1,000.00
06/20/2020	Lauren Cormier	Staff Attorney		26	5.50	\$375.00	\$2,062.50
06/21/2020	Lauren Cormier	Staff Attorney		26	2.50	\$375.00	\$937.50
06/22/2020	Addison F. Golladay	Staff Attorney		26	12.50	\$400.00	\$5,000.00
06/22/2020	Lauren Cormier	Staff Attorney		26	11.00	\$375.00	\$4,125.00
06/23/2020	Addison F. Golladay	Staff Attorney		26	8.00	\$400.00	\$3,200.00
07/02/2020	Addison F. Golladay	Staff Attorney		26	1.00	\$400.00	\$400.00
07/04/2020	Addison F. Golladay	Staff Attorney		26	8.00	\$400.00	\$3,200.00
07/05/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
07/06/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
07/08/2020	Ryan Dykhous	Associate		26	0.75	\$425.00	\$318.75
07/08/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
07/09/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
07/21/2020	Addison F. Golladay	Staff Attorney		26	2.00	\$400.00	\$800.00
07/21/2020	Ryan Dykhous	Associate		26	1.25	\$425.00	\$531.25
07/22/2020	Ryan Dykhous	Associate		26	2.25	\$425.00	\$956.25
07/22/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
07/23/2020	Ryan Dykhous	Associate		26	2.25	\$425.00	\$956.25
07/23/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
07/24/2020	Ryan Dykhous	Associate		26	0.75	\$425.00	\$318.75
07/24/2020	Jeremy Robinson	Partner		26	1.00	\$900.00	\$900.00
07/24/2020	Salvatore Graziano	Partner		26	0.75	\$1,150.00	\$862.50
07/28/2020	Ryan Dykhous	Associate		26	0.75	\$425.00	\$318.75
07/29/2020	David Duncan	Senior Counsel		26	0.50	\$775.00	\$387.50
07/29/2020	Ryan Dykhous	Associate		26	0.75	\$425.00	\$318.75
07/31/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
08/01/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
08/01/2020	Rebecca Boon	Partner		26	0.50	\$875.00	\$437.50
08/04/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
08/05/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
08/07/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
08/08/2020	Salvatore Graziano	Partner		26	0.75	\$1,150.00	\$862.50
08/09/2020	Ryan Dykhous	Associate		26	2.25	\$425.00	\$956.25

08/09/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
08/10/2020	Ryan Dykhous	Associate		26	1.25	\$425.00	\$531.25
08/10/2020	Salvatore Graziano	Partner		26	1.50	\$1,150.00	\$1,725.00
08/10/2020	Rebecca Boon	Partner		26	1.00	\$875.00	\$875.00
08/11/2020	Ryan Dykhous	Associate		26	0.75	\$425.00	\$318.75
08/13/2020	Salvatore Graziano	Partner		26	0.75	\$1,150.00	\$862.50
08/16/2020	Ryan Dykhous	Associate		26	1.25	\$425.00	\$531.25
08/17/2020	Ryan Dykhous	Associate		26	1.75	\$425.00	\$743.75
08/17/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
08/18/2020	Ryan Dykhous	Associate		26	1.25	\$425.00	\$531.25
08/19/2020	Ryan Dykhous	Associate		26	1.00	\$425.00	\$425.00
08/20/2020	Ryan Dykhous	Associate		26	1.25	\$425.00	\$531.25
08/20/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
08/21/2020	Ryan Dykhous	Associate		26	2.25	\$425.00	\$956.25
08/22/2020	Ryan Dykhous	Associate		26	3.75	\$425.00	\$1,593.75
08/22/2020	Jeremy Robinson	Partner		26	3.25	\$900.00	\$2,925.00
08/23/2020	Ryan Dykhous	Associate		26	0.50	\$425.00	\$212.50
08/23/2020	Jeremy Robinson	Partner		26	5.25	\$900.00	\$4,725.00
08/23/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
08/24/2020	Ryan Dykhous	Associate		26	3.50	\$425.00	\$1,487.50
08/24/2020	Jeremy Robinson	Partner		26	5.75	\$900.00	\$5,175.00
08/25/2020	Ryan Dykhous	Associate		26	1.25	\$425.00	\$531.25
08/25/2020	Jeremy Robinson	Partner		26	3.75	\$900.00	\$3,375.00
08/25/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
08/26/2020	Ryan Dykhous	Associate		26	1.25	\$425.00	\$531.25
08/26/2020	Jeremy Robinson	Partner		26	2.75	\$900.00	\$2,475.00
08/26/2020	Salvatore Graziano	Partner		26	2.50	\$1,150.00	\$2,875.00
08/27/2020	Salvatore Graziano	Partner		26	1.50	\$1,150.00	\$1,725.00
08/27/2020	Rebecca Boon	Partner		26	1.00	\$875.00	\$875.00
08/29/2020	Jeremy Robinson	Partner		26	1.75	\$900.00	\$1,575.00
08/31/2020	Jeremy Robinson	Partner		26	3.50	\$900.00	\$3,150.00
08/31/2020	Salvatore Graziano	Partner		26	0.75	\$1,150.00	\$862.50
08/31/2020	Rebecca Boon	Partner		26	2.00	\$875.00	\$1,750.00
09/01/2020	Jose Echegaray	Case Managers		26	1.25	\$350.00	\$437.50
09/01/2020	Ryan Dykhous	Associate		26	1.50	\$425.00	\$637.50
09/01/2020	Salvatore Graziano	Partner		26	0.75	\$1,150.00	\$862.50

09/02/2020	Helen Fikrey	Staff Attorney		26	7.50	\$400.00	\$3,000.00
09/02/2020	Ryan Dykhous	Associate		26	1.25	\$425.00	\$531.25
09/02/2020	Ryan Dykhous	Associate		26	2.50	\$425.00	\$1,062.50
09/02/2020	Stephen Imundo	Senior Staff Attorneys		26	8.00	\$425.00	\$3,400.00
09/02/2020	Stephen Imundo	Senior Staff Attorneys		26	4.00	\$425.00	\$1,700.00
09/02/2020	Salvatore Graziano	Partner		26	1.50	\$1,150.00	\$1,725.00
09/03/2020	Helen Fikrey	Staff Attorney		26	8.25	\$400.00	\$3,300.00
09/03/2020	Jose Echegaray	Case Managers		26	3.50	\$350.00	\$1,225.00
09/03/2020	Ryan Dykhous	Associate		26	1.50	\$425.00	\$637.50
09/03/2020	Jeremy Robinson	Partner		26	2.50	\$900.00	\$2,250.00
09/03/2020	Salvatore Graziano	Partner		26	1.25	\$1,150.00	\$1,437.50
09/04/2020	Ryan Dykhous	Associate		26	1.00	\$425.00	\$425.00
09/04/2020	Ryan Dykhous	Associate		26	2.25	\$425.00	\$956.25
09/04/2020	Jeremy Robinson	Partner		26	3.25	\$900.00	\$2,925.00
09/04/2020	Salvatore Graziano	Partner		26	1.50	\$1,150.00	\$1,725.00
09/04/2020	Rebecca Boon	Partner		26	1.00	\$875.00	\$875.00
09/05/2020	Jeremy Robinson	Partner		26	7.50	\$900.00	\$6,750.00
09/05/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
09/05/2020	Rebecca Boon	Partner		26	4.00	\$875.00	\$3,500.00
09/06/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
09/06/2020	Rebecca Boon	Partner		26	5.50	\$875.00	\$4,812.50
09/07/2020	Salvatore Graziano	Partner		26	1.50	\$1,150.00	\$1,725.00
09/07/2020	Rebecca Boon	Partner		26	2.00	\$875.00	\$1,750.00
09/08/2020	Ryan Dykhous	Associate		26	3.75	\$425.00	\$1,593.75
09/09/2020	Ryan Dykhous	Associate		26	4.25	\$425.00	\$1,806.25
09/10/2020	Ryan Dykhous	Associate		26	3.50	\$425.00	\$1,487.50
09/10/2020	Ryan Dykhous	Associate		26	1.00	\$425.00	\$425.00
09/10/2020	Jeremy Robinson	Partner		26	2.75	\$900.00	\$2,475.00
09/10/2020	Rebecca Boon	Partner		26	4.50	\$875.00	\$3,937.50
09/11/2020	Ryan Dykhous	Associate		26	5.25	\$425.00	\$2,231.25
09/11/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00

09/11/2020	Rebecca Boon	Partner		26	4.50	\$875.00	\$3,937.50
09/12/2020	Jose Echegaray	Case Managers		26	6.50	\$350.00	\$2,275.00
09/12/2020	Ryan Dykhous	Associate		26	6.00	\$425.00	\$2,550.00
09/12/2020	Jeremy Robinson	Partner		26	8.50	\$900.00	\$7,650.00
09/12/2020	Salvatore Graziano	Partner		26	0.50	\$1,150.00	\$575.00
09/12/2020	Rebecca Boon	Partner		26	5.00	\$875.00	\$4,375.00
09/13/2020	Ryan Dykhous	Associate		26	3.00	\$425.00	\$1,275.00
09/13/2020	Jeremy Robinson	Partner		26	10.25	\$900.00	\$9,225.00
09/13/2020	Rebecca Boon	Partner		26	5.00	\$875.00	\$4,375.00
09/14/2020	Jeremy Robinson	Partner		26	10.50	\$900.00	\$9,450.00
09/14/2020	Salvatore Graziano	Partner		26	7.00	\$1,150.00	\$8,050.00
09/14/2020	Rebecca Boon	Partner		26	10.00	\$875.00	\$8,750.00
09/15/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
09/16/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
09/16/2020	Rebecca Boon	Partner		26	2.00	\$875.00	\$1,750.00
09/17/2020	Salvatore Graziano	Partner		26	1.50	\$1,150.00	\$1,725.00
09/17/2020	Rebecca Boon	Partner		26	1.50	\$875.00	\$1,312.50
09/18/2020	Salvatore Graziano	Partner		26	1.00	\$1,150.00	\$1,150.00
09/18/2020	Rebecca Boon	Partner		26	2.00	\$875.00	\$1,750.00
			TOTALS FOR PROJECT #26:				\$282,431.25

Project #27: Consideration of Further Amendment of the Complaint. While fact discovery was ongoing, Lead Counsel held discussions and prepared an extensive memo concerning the possibility of further amending the Complaint to reflect additional information obtain during discovery. Lead Counsel spent a total of 100.5 hours with a lodestar of \$41,662.50 in connection with this project. This work, the details of which are broken down chronologically below, included strategic discussion regarding amendment, drafting a memo on the subject, and gathering discovery documents supporting amendment.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
03/26/2020	Salvatore Graziano	Partner		27	0.50	\$1,150.00	\$575.00
05/28/2020	Salvatore Graziano	Partner		27	0.75	\$1,150.00	\$862.50
05/28/2020	Ryan Dykhous	Associate		27	1.75	\$425.00	\$743.75
05/28/2020	Stephen Imundo	Senior Staff Attorneys		27	0.75	\$425.00	\$318.75
05/29/2020	Ryan Dykhous	Associate		27	2.00	\$425.00	\$850.00
05/29/2020	Stephen Imundo	Senior Staff Attorneys		27	2.00	\$425.00	\$850.00

06/02/2020	Ryan Dykhous	Associate		27	3.25	\$425.00	\$1,381.25
06/03/2020	Ryan Dykhous	Associate		27	7.50	\$425.00	\$3,187.50
06/04/2020	Salvatore Graziano	Partner		27	0.25	\$1,150.00	\$287.50
06/04/2020	Ryan Dykhous	Associate		27	4.00	\$425.00	\$1,700.00
06/05/2020	Igor Faynshteyn	Staff Attorney		27	8.00	\$375.00	\$3,000.00
06/05/2020	Ryan Dykhous	Associate		27	2.50	\$425.00	\$1,062.50
06/08/2020	Ryan Dykhous	Associate		27	1.25	\$425.00	\$531.25
06/10/2020	Ryan Dykhous	Associate		27	0.75	\$425.00	\$318.75
06/10/2020	Rebecca Boon	Partner		27	0.75	\$875.00	\$656.25
06/11/2020	Salvatore Graziano	Partner		27	1.00	\$1,150.00	\$1,150.00
06/15/2020	Ryan Dykhous	Associate		27	1.00	\$425.00	\$425.00
06/16/2020	Igor Faynshteyn	Staff Attorney		27	9.50	\$375.00	\$3,562.50
06/16/2020	Ryan Dykhous	Associate		27	0.50	\$425.00	\$212.50
06/17/2020	Igor Faynshteyn	Staff Attorney		27	9.50	\$375.00	\$3,562.50
06/18/2020	Igor Faynshteyn	Staff Attorney		27	10.00	\$375.00	\$3,750.00
06/25/2020	Igor Faynshteyn	Staff Attorney		27	9.00	\$375.00	\$3,375.00
06/29/2020	Igor Faynshteyn	Staff Attorney		27	9.00	\$375.00	\$3,375.00
06/30/2020	Igor Faynshteyn	Staff Attorney		27	9.00	\$375.00	\$3,375.00
07/01/2020	Ryan Dykhous	Associate		27	0.75	\$425.00	\$318.75
07/02/2020	Ryan Dykhous	Associate		27	2.00	\$425.00	\$850.00
08/07/2020	Ryan Dykhous	Associate		27	0.75	\$425.00	\$318.75
09/07/2020	Ryan Dykhous	Associate		27	2.50	\$425.00	\$1,062.50
TOTALS FOR PROJECT #27:					100.50		\$41,662.50

Project #28: Deposition of Former Employee 1 (FE1) (October 24, 2020). FE1 was the whistleblower whose allegations of accounting misconduct triggered an SEC and Audit Committee investigation. Lead Counsel spent a total of 120.25 hours preparing for and taking the deposition, resulting in \$72,106.25 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing relevant documents and culling potential exhibits, preparing an examination outline, and more than four hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition—one partner and one associate. The partner took the deposition, and the associate handled the uploading of exhibits onto the electronic platform. Four attorneys attended for Defendants, including three partners and one associate.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
09/10/2020	Erick Ladson	Staff Attorney		28	5.25	\$400.00	\$2,100.00
09/11/2020	Erick Ladson	Staff Attorney		28	8.50	\$400.00	\$3,400.00

09/14/2020	Erick Ladson	Staff Attorney		28	8.50	\$400.00	\$3,400.00
09/15/2020	Erick Ladson	Staff Attorney		28	8.50	\$400.00	\$3,400.00
09/16/2020	Erick Ladson	Staff Attorney		28	8.50	\$400.00	\$3,400.00
09/30/2020	Jose Echegaray	Case Managers		28	2.25	\$350.00	\$787.50
10/16/2020	Jeremy Robinson	Partner		28	1.50	\$900.00	\$1,350.00
10/19/2020	Jeremy Robinson	Partner		28	2.50	\$900.00	\$2,250.00
10/20/2020	Richard Gluck	Senior Counsel		28	0.25	\$800.00	\$200.00
10/20/2020	Richard Gluck	Senior Counsel		28	0.25	\$800.00	\$200.00
10/20/2020	Stephen Imundo	Senior Staff Attorneys		28	10.00	\$425.00	\$4,250.00
10/20/2020	Jeremy Robinson	Partner		28	3.50	\$900.00	\$3,150.00
10/21/2020	Jose Echegaray	Case Managers		28	2.50	\$350.00	\$875.00
10/21/2020	Jeremy Robinson	Partner		28	4.50	\$900.00	\$4,050.00
10/22/2020	Jose Echegaray	Case Managers		28	4.00	\$350.00	\$1,400.00
10/22/2020	Jeremy Robinson	Partner		28	9.50	\$900.00	\$8,550.00
10/23/2020	Jose Echegaray	Case Managers		28	1.50	\$350.00	\$525.00
10/23/2020	Ryan Dykhous	Associate		28	0.75	\$425.00	\$318.75
10/23/2020	Ryan Dykhous	Associate		28	1.75	\$425.00	\$743.75
10/23/2020	Jeremy Robinson	Partner		28	13.50	\$900.00	\$12,150.00
10/24/2020	Ryan Dykhous	Associate		28	10.00	\$425.00	\$4,250.00
10/24/2020	Jeremy Robinson	Partner		28	3.50	\$900.00	\$3,150.00
10/24/2020	Jeremy Robinson	Partner		28	9.00	\$900.00	\$8,100.00
10/26/2020	Ryan Dykhous	Associate		28	0.25	\$425.00	\$106.25
				TOTALS FOR PROJECT #28:		120.25	\$72,106.25

Project #29: Deposition of Miguel Jimenez (November 6, 2020). Mr. Jimenez is Symantec's Senior Director of Financial Planning and Analysis. Lead Counsel spent a total of 103.5 hours preparing for and taking the deposition, resulting in \$66,337.50 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing relevant documents and culling potential exhibits, preparing an examination outline, and five hours of questioning the witness on the record. Two attorneys and one paralegal from Lead Counsel attended the deposition, the partner who took the deposition, an associate, and a paralegal who assisted and handled the exhibits. Six attorneys attended for Defendants, including three partners and three associates. This was the sole deposition that Lead Counsel had more than two people attend. The reasons for this was that the associate who was managing the electronic documents was having power outage issues just before the deposition. Accordingly, Lead Counsel had a paralegal also attend the deposition in case the associate lost power and could no longer manage the documents during the deposition. At the deposition, this in fact happened, as the associate lost power and the paralegal had to step-in to manage the electronic documents.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
10/15/2020	Rebecca Boon	Partner		29	2.00	\$875.00	\$1,750.00
10/18/2020	Rebecca Boon	Partner		29	1.00	\$875.00	\$875.00
10/22/2020	Jose Echegaray	Case Managers		29	3.50	\$350.00	\$1,225.00
10/22/2020	Rebecca Boon	Partner		29	0.75	\$875.00	\$656.25
10/26/2020	Rebecca Boon	Partner		29	0.75	\$875.00	\$656.25
10/28/2020	Rebecca Boon	Partner		29	0.75	\$875.00	\$656.25
10/30/2020	Stephen Imundo	Senior Staff Attorneys		29	5.50	\$425.00	\$2,337.50
10/30/2020	Rebecca Boon	Partner		29	7.00	\$875.00	\$6,125.00
10/31/2020	Rebecca Boon	Partner		29	1.00	\$875.00	\$875.00
11/01/2020	Rebecca Boon	Partner		29	5.00	\$875.00	\$4,375.00
11/02/2020	Jose Echegaray	Case Managers		29	0.50	\$350.00	\$175.00
11/02/2020	Ryan Dykhous	Associate		29	1.25	\$425.00	\$531.25
11/02/2020	Rebecca Boon	Partner		29	6.50	\$875.00	\$5,687.50
11/03/2020	Jose Echegaray	Case Managers		29	0.50	\$350.00	\$175.00
11/03/2020	Ryan Dykhous	Associate		29	0.50	\$425.00	\$212.50
11/03/2020	Ryan Dykhous	Associate		29	1.00	\$425.00	\$425.00
11/03/2020	Rebecca Boon	Partner		29	7.00	\$875.00	\$6,125.00
11/04/2020	Jose Echegaray	Case Managers		29	0.75	\$350.00	\$262.50
11/04/2020	Ryan Dykhous	Associate		29	1.75	\$425.00	\$743.75
11/04/2020	Rebecca Boon	Partner		29	5.50	\$875.00	\$4,812.50
11/05/2020	Lauren Cormier	Staff Attorney		29	11.25	\$375.00	\$4,218.75
11/05/2020	Jose Echegaray	Case Managers		29	1.50	\$350.00	\$525.00
11/05/2020	Ryan Dykhous	Associate		29	2.25	\$425.00	\$956.25
11/05/2020	Rebecca Boon	Partner		29	6.75	\$875.00	\$5,906.25
11/06/2020	Jose Echegaray	Case Managers		29	6.25	\$350.00	\$2,187.50
11/06/2020	Lauren Cormier	Staff Attorney		29	4.75	\$375.00	\$1,781.25
11/06/2020	Ryan Dykhous	Associate		29	7.25	\$425.00	\$3,081.25
11/06/2020	Rebecca Boon	Partner		29	9.50	\$875.00	\$8,312.50
11/10/2020	Jose Echegaray	Case Managers		29	0.25	\$350.00	\$87.50

11/11/2020	Johanna Pitcairn	Litigation Support		29	1.00	\$400.00	\$400.00
11/16/2020	Richard Gluck	Senior Counsel		29	0.25	\$800.00	\$200.00
			TOTALS FOR PROJECT #29:		103.50		\$66,337.50

Project #30: Deposition of Michael Hannon (November 10, 2020). Mr. Hannon was Symantec's Senior Manager and then Director of SEC Reporting during the Class Period. Lead Counsel spent a total of 134.5 hours preparing for and taking the deposition, resulting in \$84,462.50 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and six hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the senior counsel who took the deposition and an associate who assisted and handled the exhibits. Six attorneys attended for Defendants, including two partners and four associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
10/22/2020	Richard Gluck	Senior Counsel		30	2.25	\$800.00	\$1,800.00
10/23/2020	Richard Gluck	Senior Counsel		30	2.25	\$800.00	\$1,800.00
10/27/2020	Richard Gluck	Senior Counsel		30	1.50	\$800.00	\$1,200.00
10/27/2020	Richard Gluck	Senior Counsel		30	1.75	\$800.00	\$1,400.00
10/27/2020	Stephen Imundo	Senior Staff Attorneys		30	8.50	\$425.00	\$3,612.50
10/28/2020	Richard Gluck	Senior Counsel		30	0.50	\$800.00	\$400.00
10/29/2020	Richard Gluck	Senior Counsel		30	2.75	\$800.00	\$2,200.00
10/30/2020	Richard Gluck	Senior Counsel		30	1.75	\$800.00	\$1,400.00
10/30/2020	Richard Gluck	Senior Counsel		30	2.50	\$800.00	\$2,000.00
11/02/2020	Brian Chau	Senior Staff Attorneys		30	5.00	\$425.00	\$2,125.00
11/02/2020	Jose Echegaray	Case Managers		30	0.50	\$350.00	\$175.00
11/02/2020	Richard Gluck	Senior Counsel		30	2.25	\$800.00	\$1,800.00
11/02/2020	Richard Gluck	Senior Counsel		30	3.25	\$800.00	\$2,600.00
11/03/2020	Brian Chau	Senior Staff Attorneys		30	5.00	\$425.00	\$2,125.00
11/03/2020	Richard Gluck	Senior Counsel		30	3.75	\$800.00	\$3,000.00
11/03/2020	Richard Gluck	Senior Counsel		30	3.50	\$800.00	\$2,800.00
11/04/2020	Brian Chau	Senior Staff Attorneys		30	4.50	\$425.00	\$1,912.50
11/04/2020	Jose Echegaray	Case Managers		30	1.00	\$350.00	\$350.00
11/04/2020	Richard Gluck	Senior Counsel		30	2.00	\$800.00	\$1,600.00
11/04/2020	Richard Gluck	Senior Counsel		30	3.75	\$800.00	\$3,000.00

11/04/2020	Richard Gluck	Senior Counsel		30	2.50	\$800.00	\$2,000.00
11/04/2020	Ryan Dykhous	Associate		30	1.75	\$425.00	\$743.75
11/05/2020	Brian Chau	Senior Staff Attorneys		30	5.00	\$425.00	\$2,125.00
11/05/2020	Jose Echegaray	Case Managers		30	1.75	\$350.00	\$612.50
11/05/2020	Richard Gluck	Senior Counsel		30	2.00	\$800.00	\$1,600.00
11/05/2020	Richard Gluck	Senior Counsel		30	3.75	\$800.00	\$3,000.00
11/06/2020	Brian Chau	Senior Staff Attorneys		30	5.00	\$425.00	\$2,125.00
11/06/2020	Michelle Leung	Case Managers		30	1.50	\$350.00	\$525.00
11/06/2020	Richard Gluck	Senior Counsel		30	1.00	\$800.00	\$800.00
11/06/2020	Richard Gluck	Senior Counsel		30	3.75	\$800.00	\$3,000.00
11/06/2020	Richard Gluck	Senior Counsel		30	2.50	\$800.00	\$2,000.00
11/07/2020	Brian Chau	Senior Staff Attorneys		30	2.50	\$425.00	\$1,062.50
11/07/2020	Richard Gluck	Senior Counsel		30	4.25	\$800.00	\$3,400.00
11/07/2020	Richard Gluck	Senior Counsel		30	1.25	\$800.00	\$1,000.00
11/08/2020	Brian Chau	Senior Staff Attorneys		30	0.25	\$425.00	\$106.25
11/08/2020	Brian Chau	Senior Staff Attorneys		30	0.25	\$425.00	\$106.25
11/09/2020	Jose Echegaray	Case Managers		30	1.75	\$350.00	\$612.50
11/09/2020	Michelle Leung	Case Managers		30	3.50	\$350.00	\$1,225.00
11/09/2020	Richard Gluck	Senior Counsel		30	1.25	\$800.00	\$1,000.00
11/09/2020	Richard Gluck	Senior Counsel		30	1.00	\$800.00	\$800.00
11/09/2020	Richard Gluck	Senior Counsel		30	2.00	\$800.00	\$1,600.00
11/09/2020	Richard Gluck	Senior Counsel		30	3.75	\$800.00	\$3,000.00
11/10/2020	Jose Echegaray	Case Managers		30	1.00	\$350.00	\$350.00
11/10/2020	Jose Echegaray	Case Managers		30	0.75	\$350.00	\$262.50
11/10/2020	Richard Gluck	Senior Counsel		30	1.75	\$800.00	\$1,400.00
11/10/2020	Richard Gluck	Senior Counsel		30	8.50	\$800.00	\$6,800.00

11/10/2020	Ryan Dykhous	Associate		30	9.25	\$425.00	\$3,931.25
11/11/2020	Jose Echegaray	Case Managers		30	0.50	\$350.00	\$175.00
11/11/2020	Richard Gluck	Senior Counsel		30	1.75	\$800.00	\$1,400.00
11/11/2020	Richard Gluck	Senior Counsel		30	0.50	\$800.00	\$400.00
				TOTALS FOR PROJECT #30:		134.50	\$84,462.50

Project #31: Deposition of Paul O'Brien (November 13, 2020). Mr. O'Brien was Symantec's Director of Finance and head of the Company's technical accounting team. Lead Counsel spent a total of 73.5 hours preparing for and taking the deposition, resulting in \$58,318.75 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and over 6.5 hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the partner who took the deposition and an associate who assisted and handled the exhibits. Four attorneys attended for Defendants, including one partner, one counsel, and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/02/2020	Jose Echegaray	Case Managers		31	0.50	\$350.00	\$175.00
11/04/2020	Jose Echegaray	Case Managers		31	0.75	\$350.00	\$262.50
11/05/2020	Jeremy Robinson	Partner		31	7.50	\$900.00	\$6,750.00
11/06/2020	Jeremy Robinson	Partner		31	4.50	\$900.00	\$4,050.00
11/08/2020	Jeremy Robinson	Partner		31	8.50	\$900.00	\$7,650.00
11/09/2020	Jose Echegaray	Case Managers		31	1.75	\$350.00	\$612.50
11/10/2020	Jeremy Robinson	Partner		31	5.50	\$900.00	\$4,950.00
11/11/2020	Jeremy Robinson	Partner		31	6.50	\$900.00	\$5,850.00
11/12/2020	Jose Echegaray	Case Managers		31	1.25	\$350.00	\$437.50
11/12/2020	Ryan Dykhous	Associate		31	2.25	\$425.00	\$956.25
11/12/2020	Jeremy Robinson	Partner		31	12.50	\$900.00	\$11,250.00
11/13/2020	Ryan Dykhous	Associate		31	9.00	\$425.00	\$3,825.00
11/13/2020	Jeremy Robinson	Partner		31	11.50	\$900.00	\$10,350.00
11/14/2020	Richard Gluck	Senior Counsel		31	1.50	\$800.00	\$1,200.00
				TOTALS FOR PROJECT #31:		73.50	\$58,318.75

Project #32: Deposition of Patricia Mora (November 18, 2020). Ms. Mora is Symantec's Senior Director of Technical Accounting and External Reporting. Lead Counsel spent a total of 88.5 hours preparing for and taking the deposition, resulting in \$37,868.75 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and over six hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the associate who took the deposition and a staff attorney who assisted and handled the exhibits. Four attorneys attended for Defendants, including two partners, one counsel and one associate.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/02/2020	Erick Ladson	Staff Attorney		32	10.50	\$400.00	\$4,200.00
11/06/2020	Erick Ladson	Staff Attorney		32	9.00	\$400.00	\$3,600.00

11/06/2020	Erick Ladson	Staff Attorney		32	1.00	\$400.00	\$400.00
11/09/2020	Addison F. Golladay	Staff Attorney		32	3.00	\$400.00	\$1,200.00
11/09/2020	Jose Echegaray	Case Managers		32	1.50	\$350.00	\$525.00
11/11/2020	Ryan Dykhous	Associate		32	3.75	\$425.00	\$1,593.75
11/12/2020	Jose Echegaray	Case Managers		32	1.25	\$350.00	\$437.50
11/12/2020	Ryan Dykhous	Associate		32	2.75	\$425.00	\$1,168.75
11/13/2020	Ryan Dykhous	Associate		32	2.00	\$425.00	\$850.00
11/15/2020	Ryan Dykhous	Associate		32	5.50	\$425.00	\$2,337.50
11/16/2020	Jose Echegaray	Case Managers		32	0.75	\$350.00	\$262.50
11/16/2020	Ryan Dykhous	Associate		32	8.75	\$425.00	\$3,718.75
11/17/2020	Jose Echegaray	Case Managers		32	1.00	\$350.00	\$350.00
11/17/2020	Richard Gluck	Senior Counsel		32	1.50	\$800.00	\$1,200.00
11/17/2020	Ryan Dykhous	Associate		32	11.25	\$425.00	\$4,781.25
11/18/2020	Jose Echegaray	Case Managers		32	0.50	\$350.00	\$175.00
11/18/2020	Richard Gluck	Senior Counsel		32	1.75	\$800.00	\$1,400.00
11/18/2020	Ryan Candee	Senior Staff Attorneys		32	8.75	\$425.00	\$3,718.75
11/18/2020	Ryan Dykhous	Associate		32	14.00	\$425.00	\$5,950.00
			TOTALS FOR PROJECT #32:		88.50		\$37,868.75

Project #33: Deposition of Abby Morrill (December 1, 2020). Ms. Morrill was Symantec's Director of Finance and head of the Company's technical accounting team. Lead Counsel spent a total of 121 hours preparing for and taking the deposition, resulting in \$82,218.75 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and five hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the senior counsel who took the deposition and an associate who assisted and handled the exhibits. Four attorneys attended for Defendants, including one partner and three associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/11/2020	Richard Gluck	Senior Counsel		33	2.25	\$800.00	\$1,800.00
11/12/2020	Jose Echegaray	Case Managers		33	1.25	\$350.00	\$437.50
11/13/2020	Richard Gluck	Senior Counsel		33	2.25	\$800.00	\$1,800.00
11/16/2020	Jose Echegaray	Case Managers		33	1.00	\$350.00	\$350.00
11/16/2020	Richard Gluck	Senior Counsel		33	2.75	\$800.00	\$2,200.00
11/17/2020	Richard Gluck	Senior Counsel		33	2.25	\$800.00	\$1,800.00
11/17/2020	Richard Gluck	Senior Counsel		33	1.50	\$800.00	\$1,200.00
11/18/2020	Richard Gluck	Senior Counsel		33	2.75	\$800.00	\$2,200.00
11/19/2020	Richard Gluck	Senior Counsel		33	3.50	\$800.00	\$2,800.00
11/19/2020	Richard Gluck	Senior Counsel		33	1.50	\$800.00	\$1,200.00
11/20/2020	Richard Gluck	Senior Counsel		33	2.50	\$800.00	\$2,000.00
11/20/2020	Richard Gluck	Senior Counsel		33	1.75	\$800.00	\$1,400.00

11/23/2020	Richard Gluck	Senior Counsel		33	3.50	\$800.00	\$2,800.00	
11/23/2020	Richard Gluck	Senior Counsel		33	4.00	\$800.00	\$3,200.00	
11/24/2020	Richard Gluck	Senior Counsel		33	3.50	\$800.00	\$2,800.00	
11/24/2020	Richard Gluck	Senior Counsel		33	1.50	\$800.00	\$1,200.00	
11/24/2020	Richard Gluck	Senior Counsel		33	4.25	\$800.00	\$3,400.00	
11/25/2020	Jose Echegaray	Case Managers		33	1.25	\$350.00	\$437.50	
11/25/2020	Richard Gluck	Senior Counsel		33	1.25	\$800.00	\$1,000.00	
11/25/2020	Richard Gluck	Senior Counsel		33	0.50	\$800.00	\$400.00	
11/25/2020	Richard Gluck	Senior Counsel		33	1.75	\$800.00	\$1,400.00	
11/25/2020	Richard Gluck	Senior Counsel		33	2.75	\$800.00	\$2,200.00	
11/27/2020	Richard Gluck	Senior Counsel		33	5.75	\$800.00	\$4,600.00	
11/29/2020	Richard Gluck	Senior Counsel		33	6.75	\$800.00	\$5,400.00	
11/29/2020	Stephen Imundo	Senior Staff Attorneys		33	2.00	\$425.00	\$850.00	
11/29/2020	Stephen Imundo	Senior Staff Attorneys		33	3.00	\$425.00	\$1,275.00	
11/30/2020	Jose Echegaray	Case Managers		33	1.75	\$350.00	\$612.50	
11/30/2020	Richard Gluck	Senior Counsel		33	0.75	\$800.00	\$600.00	
11/30/2020	Richard Gluck	Senior Counsel		33	2.75	\$800.00	\$2,200.00	
11/30/2020	Richard Gluck	Senior Counsel		33	3.75	\$800.00	\$3,000.00	
11/30/2020	Richard Gluck	Senior Counsel		33	5.50	\$800.00	\$4,400.00	
11/30/2020	Stephen Imundo	Senior Staff Attorneys		33	6.75	\$425.00	\$2,868.75	
11/30/2020	Ryan Candee	Senior Staff Attorneys		33	5.00	\$425.00	\$2,125.00	
12/01/2020	Jed Koslow	Staff Attorney		33	2.75	\$400.00	\$1,100.00	
12/01/2020	Jose Echegaray	Case Managers		33	0.75	\$350.00	\$262.50	
12/01/2020	Richard Gluck	Senior Counsel		33	10.25	\$800.00	\$8,200.00	
12/01/2020	Ryan Candee	Senior Staff Attorneys		33	9.50	\$425.00	\$4,037.50	
12/01/2020	Stephen Imundo	Senior Staff Attorneys		33	2.50	\$425.00	\$1,062.50	
12/02/2020	Richard Gluck	Senior Counsel		33	1.75	\$800.00	\$1,400.00	
01/04/2021	Richard Gluck	Senior Counsel		33	0.25	\$800.00	\$200.00	
				TOTALS FOR PROJECT #33:		121.00		\$82,218.75

Project #34: Deposition of Sean Delehanty (December 5, 2020). Mr. Delehanty was a senior director of finance at Symantec during the Class Period. Lead Counsel spent a total of 71 hours preparing for and taking the deposition, resulting in \$48,975.00 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and five hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the partner who took the deposition and an associate who assisted and handled the exhibits. Four attorneys attended for Defendants, including two partners and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar	
11/17/2020	Jose Echegaray	Case Managers		34	0.75	\$350.00	\$262.50	
11/23/2020	Jose Echegaray	Case Managers		34	1.25	\$350.00	\$437.50	
11/24/2020	Jose Echegaray	Case Managers		34	1.25	\$350.00	\$437.50	
11/25/2020	Jose Echegaray	Case Managers		34	1.25	\$350.00	\$437.50	
11/30/2020	Jose Echegaray	Case Managers		34	1.50	\$350.00	\$525.00	
11/30/2020	Rebecca Boon	Partner		34	5.50	\$875.00	\$4,812.50	
12/01/2020	Jose Echegaray	Case Managers		34	0.50	\$350.00	\$175.00	
12/01/2020	Rebecca Boon	Partner		34	7.00	\$875.00	\$6,125.00	
12/02/2020	Igor Faynshteyn	Staff Attorney		34	8.00	\$375.00	\$3,000.00	
12/02/2020	Jose Echegaray	Case Managers		34	1.75	\$350.00	\$612.50	
12/02/2020	Rebecca Boon	Partner		34	7.00	\$875.00	\$6,125.00	
12/03/2020	Jose Echegaray	Case Managers		34	1.25	\$350.00	\$437.50	
12/03/2020	Rebecca Boon	Partner		34	7.50	\$875.00	\$6,562.50	
12/04/2020	Ryan Dykhous	Associate		34	1.75	\$425.00	\$743.75	
12/04/2020	Rebecca Boon	Partner		34	7.25	\$875.00	\$6,343.75	
12/05/2020	Ryan Dykhous	Associate		34	7.50	\$425.00	\$3,187.50	
12/05/2020	Rebecca Boon	Partner		34	10.00	\$875.00	\$8,750.00	
				TOTALS FOR PROJECT #34:			71.00	

Project #35: Deposition of Vivek Mani (December 12, 2020). Mr. Mani was a finance Vice President at Symantec. Lead Counsel spent a total of 120.75 hours preparing for and taking the deposition, resulting in \$49,493.75 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and over six hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the associate who took the deposition and a staff attorney who assisted and handled the exhibits. Five attorneys attended for Defendants, including three partners, one counsel, and one associate.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
09/25/2020	Addison F. Golladay	Staff Attorney		35	6.50	\$400.00	\$2,600.00
09/27/2020	Addison F. Golladay	Staff Attorney		35	5.50	\$400.00	\$2,200.00
10/01/2020	Addison F. Golladay	Staff Attorney		35	7.50	\$400.00	\$3,000.00
11/02/2020	Addison F. Golladay	Staff Attorney		35	1.00	\$400.00	\$400.00
11/19/2020	Daniel Renehan	Staff Attorney		35	1.50	\$400.00	\$600.00

11/23/2020	Jose Echegaray	Case Managers		35	1.25	\$350.00	\$437.50
11/24/2020	Jose Echegaray	Case Managers		35	1.00	\$350.00	\$350.00
11/25/2020	Jose Echegaray	Case Managers		35	1.25	\$350.00	\$437.50
11/30/2020	Jose Echegaray	Case Managers		35	1.75	\$350.00	\$612.50
12/01/2020	Jose Echegaray	Case Managers		35	0.75	\$350.00	\$262.50
12/02/2020	Jose Echegaray	Case Managers		35	1.75	\$350.00	\$612.50
12/03/2020	Jose Echegaray	Case Managers		35	1.00	\$350.00	\$350.00
12/06/2020	Ryan Dykhous	Associate		35	3.25	\$425.00	\$1,381.25
12/07/2020	Addison F. Golladay	Staff Attorney		35	2.50	\$400.00	\$1,000.00
12/07/2020	Addison F. Golladay	Staff Attorney		35	3.50	\$400.00	\$1,400.00
12/07/2020	Esinam Quarco	Staff Attorney		35	4.00	\$400.00	\$1,600.00
12/07/2020	Ryan Dykhous	Associate		35	4.25	\$425.00	\$1,806.25
12/08/2020	Addison F. Golladay	Staff Attorney		35	9.50	\$400.00	\$3,800.00
12/08/2020	Ryan Dykhous	Associate		35	5.25	\$425.00	\$2,231.25
12/09/2020	Addison F. Golladay	Staff Attorney		35	11.00	\$400.00	\$4,400.00
12/09/2020	Esinam Quarco	Staff Attorney		35	12.00	\$400.00	\$4,800.00
12/09/2020	Ryan Dykhous	Associate		35	9.00	\$425.00	\$3,825.00
12/10/2020	Addison F. Golladay	Staff Attorney		35	1.00	\$400.00	\$400.00
12/10/2020	Ryan Candee	Senior Staff Attorneys		35	10.50	\$425.00	\$4,462.50
12/10/2020	Ryan Dykhous	Associate		35	13.00	\$425.00	\$5,525.00
12/11/2020	Richard Gluck	Senior Counsel		35	1.25	\$800.00	\$1,000.00
			TOTALS FOR PROJECT #35:		120.75		\$49,493.75

Project #36: Deposition of Matthew Brown (December 16, 2020). Mr. Brown was Symantec's corporate controller and interim CFO. Lead Counsel spent a total of 52.75 hours preparing for and taking the deposition, resulting in \$41,600.00 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and over seven hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the partner who took the deposition and an associate who assisted and handled the exhibits. Four attorneys attended for Defendants, including two partners, one counsel, and one associate.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
12/02/2020	Jose Echegaray	Case Managers		36	1.50	\$350.00	\$525.00
12/03/2020	Jose Echegaray	Case Managers		36	1.00	\$350.00	\$350.00
12/07/2020	Jeremy Robinson	Partner		36	3.00	\$900.00	\$2,700.00
12/08/2020	Jeremy Robinson	Partner		36	4.00	\$900.00	\$3,600.00
12/10/2020	Jeremy Robinson	Partner		36	2.00	\$900.00	\$1,800.00
12/11/2020	Jeremy Robinson	Partner		36	2.00	\$900.00	\$1,800.00
12/14/2020	Jeremy Robinson	Partner		36	4.00	\$900.00	\$3,600.00
12/15/2020	Richard Gluck	Senior Counsel		36	0.75	\$800.00	\$600.00
12/15/2020	Jeremy Robinson	Partner		36	11.00	\$900.00	\$9,900.00
12/16/2020	Richard Gluck	Senior Counsel		36	1.50	\$800.00	\$1,200.00

12/16/2020	Ryan Dykhous	Associate		36	9.00	\$425.00	\$3,825.00
12/16/2020	Jeremy Robinson	Partner		36	13.00	\$900.00	\$11,700.00
			TOTALS FOR PROJECT #36:		52.75		\$41,600.00

Project #37: Deposition of Former Employee 2 (FE2) (December 22, 2020). FE2 was another former Symantec employee and whistleblower. Lead Counsel spent a total of 90.25 hours preparing for and taking the deposition of FE2, resulting in \$67,750.00 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and 6.5 hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the partner who took the deposition and an associate who assisted and handled the exhibits. Five attorneys attended for Defendants, including three partners and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/17/2020	Jose Echegaray	Case Managers		37	0.75	\$350.00	\$262.50
11/18/2020	Jose Echegaray	Case Managers		37	0.50	\$350.00	\$175.00
12/04/2020	Ryan Dykhous	Associate		37	0.50	\$425.00	\$212.50
12/14/2020	Richard Gluck	Senior Counsel		37	0.25	\$800.00	\$200.00
12/15/2020	Richard Gluck	Senior Counsel		37	0.25	\$800.00	\$200.00
12/17/2020	Ryan Dykhous	Associate		37	1.00	\$425.00	\$425.00
12/17/2020	Jeremy Robinson	Partner		37	10.00	\$900.00	\$9,000.00
12/18/2020	Brian Chau	Senior Staff Attorneys		37	10.00	\$425.00	\$4,250.00
12/18/2020	Johanna Pitcairn	Litigation Support		37	1.50	\$400.00	\$600.00
12/18/2020	Richard Gluck	Senior Counsel		37	0.25	\$800.00	\$200.00
12/18/2020	Jeremy Robinson	Partner		37	8.00	\$900.00	\$7,200.00
12/19/2020	Jeremy Robinson	Partner		37	8.00	\$900.00	\$7,200.00
12/20/2020	Brian Chau	Senior Staff Attorneys		37	4.00	\$425.00	\$1,700.00
12/20/2020	Jeremy Robinson	Partner		37	9.00	\$900.00	\$8,100.00
12/21/2020	Jeremy Robinson	Partner		37	12.00	\$900.00	\$10,800.00
12/22/2020	Ryan Dykhous	Associate		37	9.00	\$425.00	\$3,825.00
12/22/2020	Jeremy Robinson	Partner		37	12.00	\$900.00	\$10,800.00
12/24/2020	Richard Gluck	Senior Counsel		37	1.75	\$800.00	\$1,400.00
12/28/2020	Richard Gluck	Senior Counsel		37	1.50	\$800.00	\$1,200.00
			TOTALS FOR PROJECT #37:		90.25		\$67,750.00

Project #38: Deposition of Madeline Wolf (January 7, 2021). Ms. Wolf (who used her maiden name, Maddy Gatto, at Symantec) was Symantec's Vice President, Finance and Corporate Controller. Lead Counsel spent a total of 98 hours preparing for and taking the deposition, resulting in \$68,837.50 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and selecting exhibits, preparing an examination outline, and 4.5 hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the senior counsel who took the deposition and an associate who assisted and handled the exhibits. Four attorneys attended for the defendants, including one partners, one of counsel, and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
10/01/2020	Ryan Dykhous	Associate		38	0.50	\$425.00	\$212.50
12/01/2020	Stephen Imundo	Senior Staff Attorneys		38	2.50	\$425.00	\$1,062.50
12/02/2020	Richard Gluck	Senior Counsel		38	1.50	\$800.00	\$1,200.00
12/04/2020	Richard Gluck	Senior Counsel		38	1.75	\$800.00	\$1,400.00
12/09/2020	Richard Gluck	Senior Counsel		38	3.25	\$800.00	\$2,600.00
12/10/2020	Richard Gluck	Senior Counsel		38	3.50	\$800.00	\$2,800.00
12/14/2020	Richard Gluck	Senior Counsel		38	3.75	\$800.00	\$3,000.00
12/14/2020	Richard Gluck	Senior Counsel		38	0.25	\$800.00	\$200.00
12/14/2020	Richard Gluck	Senior Counsel		38	0.25	\$800.00	\$200.00
12/14/2020	Richard Gluck	Senior Counsel		38	1.75	\$800.00	\$1,400.00
12/15/2020	Richard Gluck	Senior Counsel		38	2.50	\$800.00	\$2,000.00
12/15/2020	Richard Gluck	Senior Counsel		38	2.75	\$800.00	\$2,200.00
12/16/2020	Richard Gluck	Senior Counsel		38	3.50	\$800.00	\$2,800.00
12/17/2020	Richard Gluck	Senior Counsel		38	2.50	\$800.00	\$2,000.00
12/18/2020	Richard Gluck	Senior Counsel		38	2.25	\$800.00	\$1,800.00
12/21/2020	Richard Gluck	Senior Counsel		38	2.25	\$800.00	\$1,800.00
12/23/2020	Richard Gluck	Senior Counsel		38	2.25	\$800.00	\$1,800.00
12/29/2020	Richard Gluck	Senior Counsel		38	2.50	\$800.00	\$2,000.00
01/04/2021	Richard Gluck	Senior Counsel		38	3.50	\$800.00	\$2,800.00
01/04/2021	Richard Gluck	Senior Counsel		38	2.75	\$800.00	\$2,200.00
01/04/2021	Richard Gluck	Senior Counsel		38	1.75	\$800.00	\$1,400.00
01/04/2021	Ryan Dykhous	Associate		38	1.00	\$425.00	\$425.00
01/04/2021	Ryan Dykhous	Associate		38	0.25	\$425.00	\$106.25
01/04/2021	Ryan Dykhous	Associate		38	0.25	\$425.00	\$106.25
01/05/2021	Andrew Boruch	Senior Staff Attorneys		38	6.75	\$425.00	\$2,868.75
01/05/2021	Richard Gluck	Senior Counsel		38	1.00	\$800.00	\$800.00
01/05/2021	Richard Gluck	Senior Counsel		38	0.25	\$800.00	\$200.00

01/05/2021	Richard Gluck	Senior Counsel		38	0.25	\$800.00	\$200.00
01/05/2021	Richard Gluck	Senior Counsel		38	3.50	\$800.00	\$2,800.00
01/05/2021	Richard Gluck	Senior Counsel		38	3.75	\$800.00	\$3,000.00
01/05/2021	Ryan Candee	Senior Staff Attorneys		38	4.75	\$425.00	\$2,018.75
01/05/2021	Ryan Dykhous	Associate		38	0.25	\$425.00	\$106.25
01/05/2021	Ryan Dykhous	Associate		38	0.25	\$425.00	\$106.25
01/06/2021	Richard Gluck	Senior Counsel		38	4.25	\$800.00	\$3,400.00
01/06/2021	Richard Gluck	Senior Counsel		38	3.50	\$800.00	\$2,800.00
01/06/2021	Richard Gluck	Senior Counsel		38	2.75	\$800.00	\$2,200.00
01/06/2021	Ryan Dykhous	Associate		38	1.00	\$425.00	\$425.00
01/07/2021	Richard Gluck	Senior Counsel		38	8.75	\$800.00	\$7,000.00
01/07/2021	Ryan Dykhous	Associate		38	8.00	\$425.00	\$3,400.00
			TOTALS FOR PROJECT #38:		98.00		\$68,837.50

Project #39: Deposition of Michael Fey (January 8, 2021). Mr. Fey was Symantec's President and Chief Operating Officer during the Class Period. Lead Counsel spent a total of 76.25 hours preparing for and taking the deposition, resulting in \$53,131.25 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and nearly seven hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the partner who took the deposition and an associate who assisted and handled the exhibits. Five attorneys attended for the defendants, including two partners and three associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
12/17/2020	Addison F. Golladay	Staff Attorney		39	10.00	\$400.00	\$4,000.00
12/23/2020	Jeremy Robinson	Partner		39	2.00	\$900.00	\$1,800.00
12/30/2020	Jeremy Robinson	Partner		39	3.00	\$900.00	\$2,700.00
01/03/2021	Stephen Imundo	Senior Staff Attorneys		39	4.75	\$425.00	\$2,018.75
01/04/2021	Jeremy Robinson	Partner		39	10.00	\$900.00	\$9,000.00
01/06/2021	Andrew Boruch	Senior Staff Attorneys		39	6.25	\$425.00	\$2,656.25
01/06/2021	Ryan Dykhous	Associate		39	1.00	\$425.00	\$425.00
01/06/2021	Jeremy Robinson	Partner		39	6.00	\$900.00	\$5,400.00
01/07/2021	Jeremy Robinson	Partner		39	11.00	\$900.00	\$9,900.00
01/08/2021	Ryan Dykhous	Associate		39	9.75	\$425.00	\$4,143.75
01/08/2021	Jeremy Robinson	Partner		39	12.00	\$900.00	\$10,800.00
02/08/2021	Richard Gluck	Senior Counsel		39	0.25	\$800.00	\$200.00
02/09/2021	Jose Echegaray	Case Managers		39	0.25	\$350.00	\$87.50
			TOTALS FOR PROJECT #39:		76.25		\$53,131.25

Project #40: Deposition of James Dildine (January 11, 2021). Mr. Dildine was CFO of Symantec's Enterprise Security business during the Class Period. Lead Counsel spent a total of 86.25 hours preparing for and taking the deposition, resulting in \$60,693.75 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and nearly seven hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the partner who took the deposition and an associate who assisted and handled the exhibits. Four attorneys attended for Defendants, including one partner, one counsel, and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/11/2020	Erick Ladson	Staff Attorney		40	8.50	\$400.00	\$3,400.00
11/17/2020	Jose Echegaray	Case Managers		40	0.75	\$350.00	\$262.50
11/18/2020	Jose Echegaray	Case Managers		40	0.50	\$350.00	\$175.00
11/23/2020	Jose Echegaray	Case Managers		40	1.50	\$350.00	\$525.00
11/24/2020	Jose Echegaray	Case Managers		40	1.25	\$350.00	\$437.50
11/25/2020	Jose Echegaray	Case Managers		40	1.25	\$350.00	\$437.50
11/30/2020	Jose Echegaray	Case Managers		40	1.50	\$350.00	\$525.00
12/01/2020	Jose Echegaray	Case Managers		40	0.50	\$350.00	\$175.00
01/05/2021	Stephen Imundo	Senior Staff Attorneys		40	9.75	\$425.00	\$4,143.75
01/05/2021	Jeremy Robinson	Partner		40	10.00	\$900.00	\$9,000.00
01/06/2021	Jeremy Robinson	Partner		40	4.00	\$900.00	\$3,600.00
01/09/2021	Jeremy Robinson	Partner		40	12.00	\$900.00	\$10,800.00
01/10/2021	Jeremy Robinson	Partner		40	14.00	\$900.00	\$12,600.00
01/11/2021	Ryan Dykhous	Associate		40	8.50	\$425.00	\$3,612.50
01/11/2021	Jeremy Robinson	Partner		40	12.00	\$900.00	\$10,800.00
02/09/2021	Richard Gluck	Senior Counsel		40	0.25	\$800.00	\$200.00
				TOTALS FOR PROJECT #40:		86.25	

Project #41: Deposition of Matthew MacKenzie (January 13, 2021). Mr. MacKenzie was Symantec's Chief of Staff during the Class Period. Lead Counsel spent a total of 83 hours preparing for and taking the deposition, resulting in \$51,806.25 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and seven hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the senior counsel who took the deposition and an associate who assisted and handled the exhibits. Four attorneys attended for Defendants, including two partners and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/17/2020	Jose Echegaray	Case Managers		41	0.75	\$350.00	\$262.50
11/18/2020	Jose Echegaray	Case Managers		41	0.50	\$350.00	\$175.00
11/19/2020	Jose Echegaray	Case Managers		41	0.25	\$350.00	\$87.50
12/15/2020	Ibrahim Hamed	Staff Attorney		41	11.00	\$400.00	\$4,400.00
12/21/2020	Richard Gluck	Senior Counsel		41	2.00	\$800.00	\$1,600.00

12/22/2020	Richard Gluck	Senior Counsel		41	3.75	\$800.00	\$3,000.00
12/28/2020	Richard Gluck	Senior Counsel		41	1.50	\$800.00	\$1,200.00
01/08/2021	Richard Gluck	Senior Counsel		41	2.50	\$800.00	\$2,000.00
01/08/2021	Richard Gluck	Senior Counsel		41	3.75	\$800.00	\$3,000.00
01/11/2021	Jose Echegaray	Case Managers		41	2.75	\$350.00	\$962.50
01/11/2021	Lawrence Hosmer	Senior Staff Attorneys		41	3.25	\$425.00	\$1,381.25
01/11/2021	Richard Gluck	Senior Counsel		41	0.50	\$800.00	\$400.00
01/11/2021	Richard Gluck	Senior Counsel		41	9.75	\$800.00	\$7,800.00
01/11/2021	Stephen Imundo	Senior Staff Attorneys		41	3.25	\$425.00	\$1,381.25
01/12/2021	Andrew Boruch	Senior Staff Attorneys		41	1.00	\$425.00	\$425.00
01/12/2021	Helen Fikrey	Staff Attorney		41	5.00	\$400.00	\$2,000.00
01/12/2021	Richard Gluck	Senior Counsel		41	4.00	\$800.00	\$3,200.00
01/12/2021	Richard Gluck	Senior Counsel		41	4.25	\$800.00	\$3,400.00
01/12/2021	Richard Gluck	Senior Counsel		41	2.50	\$800.00	\$2,000.00
01/12/2021	Ryan Dykhous	Associate		41	1.25	\$425.00	\$531.25
01/13/2021	Richard Gluck	Senior Counsel		41	11.50	\$800.00	\$9,200.00
01/13/2021	Ryan Dykhous	Associate		41	8.00	\$425.00	\$3,400.00
TOTALS FOR PROJECT #41:					83.00		\$51,806.25

Project #42: Deposition of Mark Garfield (January 16, 2021). Mr. Garfield was Symantec's Chief Accounting Officer during the beginning the Class Period and was a former defendant in this Action who was dismissed by the Court's October 2, 2019 order. Lead Counsel spent a total of 92.75 hours preparing for and taking the deposition, resulting in \$64,087.50 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and 6.5 hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the partner who took the deposition and an associate who assisted and handled the exhibits. Six attorneys attended for the defendants, including three partners, one counsel and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
01/04/2021	Ryan Dykhous	Associate		42	0.25	\$425.00	\$106.25
01/05/2021	Ryan Dykhous	Associate		42	0.25	\$425.00	\$106.25
01/11/2021	Jose Echegaray	Case Managers		42	2.75	\$350.00	\$962.50
01/12/2021	Andrew Boruch	Senior Staff Attorneys		42	7.75	\$425.00	\$3,293.75
01/12/2021	Jed Koslow	Staff Attorney		42	10.75	\$400.00	\$4,300.00
01/12/2021	Jeremy Robinson	Partner		42	10.00	\$900.00	\$9,000.00
01/13/2021	Andrew Boruch	Senior Staff Attorneys		42	4.25	\$425.00	\$1,806.25
01/13/2021	Jed Koslow	Staff Attorney		42	5.00	\$400.00	\$2,000.00
01/13/2021	Jeremy Robinson	Partner		42	10.00	\$900.00	\$9,000.00
01/14/2021	Richard Gluck	Senior Counsel		42	0.25	\$800.00	\$200.00

01/14/2021	Jeremy Robinson	Partner		42	9.00	\$900.00	\$8,100.00
01/15/2021	Jeremy Robinson	Partner		42	11.00	\$900.00	\$9,900.00
01/16/2021	Ryan Dykhous	Associate		42	8.50	\$425.00	\$3,612.50
01/16/2021	Jeremy Robinson	Partner		42	13.00	\$900.00	\$11,700.00
			TOTALS FOR PROJECT #42:	92.75			\$64,087.50

Project #43: Deposition of Nicholas Noviello (January 19, 2021). Mr. Noviello was Symantec's Chief Financial Officer during the Class Period and was a former defendant in this Action who was dismissed by the Court's October 2, 2019 order. Lead Counsel spent a total of 77.25 hours preparing for and taking the deposition, resulting in \$54,768.75 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and 7.5 hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the senior counsel who took the deposition and an associate who assisted and handled the exhibits. Four attorneys attended for Defendants, including three partners and one associate.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/16/2020	Richard Gluck	Senior Counsel		43	0.75	\$800.00	\$600.00
12/29/2020	Richard Gluck	Senior Counsel		43	0.25	\$800.00	\$200.00
01/14/2021	Richard Gluck	Senior Counsel		43	0.50	\$800.00	\$400.00
01/14/2021	Richard Gluck	Senior Counsel		43	2.75	\$800.00	\$2,200.00
01/14/2021	Richard Gluck	Senior Counsel		43	3.50	\$800.00	\$2,800.00
01/15/2021	Richard Gluck	Senior Counsel		43	2.75	\$800.00	\$2,200.00
01/15/2021	Richard Gluck	Senior Counsel		43	4.75	\$800.00	\$3,800.00
01/15/2021	Ryan Dykhous	Associate		43	0.50	\$425.00	\$212.50
01/16/2021	Richard Gluck	Senior Counsel		43	5.50	\$800.00	\$4,400.00
01/16/2021	Richard Gluck	Senior Counsel		43	5.00	\$800.00	\$4,000.00
01/17/2021	Richard Gluck	Senior Counsel		43	9.75	\$800.00	\$7,800.00
01/18/2021	Richard Gluck	Senior Counsel		43	3.75	\$800.00	\$3,000.00
01/18/2021	Richard Gluck	Senior Counsel		43	0.50	\$800.00	\$400.00
01/18/2021	Richard Gluck	Senior Counsel		43	6.75	\$800.00	\$5,400.00
01/18/2021	Stephen Imundo	Senior Staff Attorneys		43	9.25	\$425.00	\$3,931.25
01/19/2021	Richard Gluck	Senior Counsel		43	10.25	\$800.00	\$8,200.00
01/19/2021	Ryan Dykhous	Associate		43	8.50	\$425.00	\$3,612.50
01/20/2021	Richard Gluck	Senior Counsel		43	1.75	\$800.00	\$1,400.00
01/20/2021	Ryan Dykhous	Associate		43	0.50	\$425.00	\$212.50
			TOTALS FOR PROJECT #43:	77.25			\$54,768.75

Project #44: Deposition of Gregory Clark (January 22, 2021). Mr. Clark was Symantec's former CEO and a named defendant in this Action. Lead Counsel spent a total of 95 hours preparing for and taking the deposition, resulting in \$68,793.75 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and more than eight hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the partner who took the deposition and an associate who assisted and handled the exhibits. Five attorneys attended for Defendants, including three partners and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar	
01/17/2021	Jeremy Robinson	Partner		44	10.00	\$900.00	\$9,000.00	
01/18/2021	Richard Gluck	Senior Counsel		44	0.50	\$800.00	\$400.00	
01/18/2021	Ryan Dykhous	Associate		44	0.75	\$425.00	\$318.75	
01/18/2021	Jeremy Robinson	Partner		44	8.00	\$900.00	\$7,200.00	
01/19/2021	Jose Echegaray	Case Managers		44	2.25	\$350.00	\$787.50	
01/19/2021	Lawrence Hosmer	Senior Staff Attorneys		44	5.00	\$425.00	\$2,125.00	
01/19/2021	Jeremy Robinson	Partner		44	10.00	\$900.00	\$9,000.00	
01/20/2021	Jose Echegaray	Case Managers		44	2.25	\$350.00	\$787.50	
01/20/2021	Ryan Dykhous	Associate		44	0.50	\$425.00	\$212.50	
01/20/2021	Jeremy Robinson	Partner		44	9.00	\$900.00	\$8,100.00	
01/21/2021	Jose Echegaray	Case Managers		44	0.50	\$350.00	\$175.00	
01/21/2021	Preya Rodriguez	Paralegal		44	8.75	\$325.00	\$2,843.75	
01/21/2021	Ryan Dykhous	Associate		44	0.75	\$425.00	\$318.75	
01/21/2021	Jeremy Robinson	Partner		44	12.00	\$900.00	\$10,800.00	
01/22/2021	Jose Echegaray	Case Managers		44	2.00	\$350.00	\$700.00	
01/22/2021	Ryan Dykhous	Associate		44	9.00	\$425.00	\$3,825.00	
01/22/2021	Jeremy Robinson	Partner		44	12.00	\$900.00	\$10,800.00	
01/25/2021	Richard Gluck	Senior Counsel		44	1.75	\$800.00	\$1,400.00	
				TOTALS FOR PROJECT #44:			95.00	

Project #45: Rule 30(b)(6) Deposition of Ernst & Young (EY) (January 26, 2021). EY performed various accounting consulting projects for Symantec during the Class Period, including a review of its T&T expenses. Lead Counsel spent a total of 105.5 hours preparing for and taking the deposition, resulting in \$45,437.50 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and 5.5 hours of questioning the witness on the record. One attorney and one paralegal from Lead Counsel attended the deposition, the associate who took the deposition and a paralegal who assisted and handled the exhibits. Four attorneys attended for Defendants, including one partner, one counsel, and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/18/2020	Richard Gluck	Senior Counsel		45	0.50	\$800.00	\$400.00
11/18/2020	Richard Gluck	Senior Counsel		45	0.25	\$800.00	\$200.00
11/23/2020	Richard Gluck	Senior Counsel		45	0.25	\$800.00	\$200.00
11/24/2020	Jose Echegaray	Case Managers		45	0.50	\$350.00	\$175.00
12/07/2020	Richard Gluck	Senior Counsel		45	0.25	\$800.00	\$200.00
12/29/2020	Richard Gluck	Senior Counsel		45	0.25	\$800.00	\$200.00
01/04/2021	Ryan Dykhous	Associate		45	0.25	\$425.00	\$106.25

01/05/2021	Richard Gluck	Senior Counsel		45	0.75	\$800.00	\$600.00
01/05/2021	Ryan Dykhous	Associate		45	0.50	\$425.00	\$212.50
01/05/2021	Ryan Dykhous	Associate		45	0.25	\$425.00	\$106.25
01/08/2021	Richard Gluck	Senior Counsel		45	0.25	\$800.00	\$200.00
01/08/2021	Ryan Dykhous	Associate		45	1.25	\$425.00	\$531.25
01/15/2021	Richard Gluck	Senior Counsel		45	0.25	\$800.00	\$200.00
01/15/2021	Richard Gluck	Senior Counsel		45	0.25	\$800.00	\$200.00
01/18/2021	Ryan Dykhous	Associate		45	2.75	\$425.00	\$1,168.75
01/19/2021	Brian Chau	Senior Staff Attorneys		45	10.00	\$425.00	\$4,250.00
01/19/2021	Jose Echegaray	Case Managers		45	2.25	\$350.00	\$787.50
01/19/2021	Ryan Dykhous	Associate		45	0.50	\$425.00	\$212.50
01/20/2021	Brian Chau	Senior Staff Attorneys		45	11.00	\$425.00	\$4,675.00
01/20/2021	Richard Gluck	Senior Counsel		45	0.25	\$800.00	\$200.00
01/20/2021	Ryan Dykhous	Associate		45	0.50	\$425.00	\$212.50
01/21/2021	Brian Chau	Senior Staff Attorneys		45	11.00	\$425.00	\$4,675.00
01/21/2021	Jose Echegaray	Case Managers		45	0.50	\$350.00	\$175.00
01/21/2021	Richard Gluck	Senior Counsel		45	0.25	\$800.00	\$200.00
01/21/2021	Richard Gluck	Senior Counsel		45	0.25	\$800.00	\$200.00
01/21/2021	Ryan Dykhous	Associate		45	1.75	\$425.00	\$743.75
01/22/2021	Brian Chau	Senior Staff Attorneys		45	10.00	\$425.00	\$4,250.00
01/23/2021	Ryan Dykhous	Associate		45	2.00	\$425.00	\$850.00
01/24/2021	Ryan Dykhous	Associate		45	6.50	\$425.00	\$2,762.50
01/25/2021	Brian Chau	Senior Staff Attorneys		45	4.00	\$425.00	\$1,700.00
01/25/2021	Jose Echegaray	Case Managers		45	2.50	\$350.00	\$875.00
01/25/2021	Ryan Dykhous	Associate		45	12.75	\$425.00	\$5,418.75
01/26/2021	Jose Echegaray	Case Managers		45	7.00	\$350.00	\$2,450.00
01/26/2021	Jose Echegaray	Case Managers		45	3.00	\$350.00	\$1,050.00
01/26/2021	Richard Gluck	Senior Counsel		45	1.00	\$800.00	\$800.00
01/26/2021	Ryan Dykhous	Associate		45	10.00	\$425.00	\$4,250.00
				TOTALS FOR PROJECT #45:		105.50	\$45,437.50

Project #46: Rule 30(b)(6) Deposition of KPMG (January 29, 2021). KPMG was Symantec's independent auditor during the Class Period. Lead Counsel spent a total of 135.75 hours preparing for and taking the deposition, resulting in \$77,975.00 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing relevant documents and culling potential exhibits, preparing an examination outline, and 4.5 hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the senior counsel who took the deposition and a staff attorney who assisted and handled the exhibits. Four attorneys attended for Defendants, including two partners and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/16/2020	Richard Gluck	Senior Counsel		46	0.25	\$800.00	\$200.00
11/17/2020	Jose Echegaray	Case Managers		46	0.25	\$350.00	\$87.50
11/18/2020	Richard Gluck	Senior Counsel		46	0.50	\$800.00	\$400.00
11/19/2020	Richard Gluck	Senior Counsel		46	0.50	\$800.00	\$400.00
11/23/2020	Richard Gluck	Senior Counsel		46	0.25	\$800.00	\$200.00
11/24/2020	Jose Echegaray	Case Managers		46	0.50	\$350.00	\$175.00
12/17/2020	Richard Gluck	Senior Counsel		46	0.25	\$800.00	\$200.00
12/18/2020	Richard Gluck	Senior Counsel		46	0.25	\$800.00	\$200.00
12/18/2020	Ryan Dykhous	Associate		46	1.00	\$425.00	\$425.00
12/31/2020	Richard Gluck	Senior Counsel		46	0.25	\$800.00	\$200.00
01/05/2021	Richard Gluck	Senior Counsel		46	0.25	\$800.00	\$200.00
01/05/2021	Ryan Dykhous	Associate		46	1.00	\$425.00	\$425.00
01/06/2021	Richard Gluck	Senior Counsel		46	0.50	\$800.00	\$400.00
01/06/2021	Ryan Dykhous	Associate		46	0.25	\$425.00	\$106.25
01/08/2021	Richard Gluck	Senior Counsel		46	0.25	\$800.00	\$200.00
01/10/2021	Ryan Dykhous	Associate		46	1.25	\$425.00	\$531.25
01/11/2021	Addison F. Golladay	Staff Attorney		46	8.00	\$400.00	\$3,200.00
01/11/2021	Ryan Dykhous	Associate		46	0.75	\$425.00	\$318.75
01/12/2021	Addison F. Golladay	Staff Attorney		46	6.75	\$400.00	\$2,700.00
01/12/2021	Richard Gluck	Senior Counsel		46	1.00	\$800.00	\$800.00
01/12/2021	Ryan Dykhous	Associate		46	1.00	\$425.00	\$425.00
01/13/2021	Addison F. Golladay	Staff Attorney		46	6.75	\$400.00	\$2,700.00
01/14/2021	Addison F. Golladay	Staff Attorney		46	8.00	\$400.00	\$3,200.00

01/14/2021	Richard Gluck	Senior Counsel		46	0.50	\$800.00	\$400.00
01/14/2021	Richard Gluck	Senior Counsel		46	0.25	\$800.00	\$200.00
01/14/2021	Ryan Dykhous	Associate		46	0.50	\$425.00	\$212.50
01/15/2021	Richard Gluck	Senior Counsel		46	0.25	\$800.00	\$200.00
01/15/2021	Richard Gluck	Senior Counsel		46	0.50	\$800.00	\$400.00
01/15/2021	Ryan Dykhous	Associate		46	2.25	\$425.00	\$956.25
01/18/2021	Ryan Dykhous	Associate		46	0.75	\$425.00	\$318.75
01/19/2021	Jose Echegaray	Case Managers		46	2.50	\$350.00	\$875.00
01/20/2021	Jose Echegaray	Case Managers		46	0.50	\$350.00	\$175.00
01/20/2021	Jose Echegaray	Case Managers		46	2.25	\$350.00	\$787.50
01/20/2021	Richard Gluck	Senior Counsel		46	0.50	\$800.00	\$400.00
01/20/2021	Richard Gluck	Senior Counsel		46	0.25	\$800.00	\$200.00
01/20/2021	Ryan Dykhous	Associate		46	0.50	\$425.00	\$212.50
01/21/2021	Jose Echegaray	Case Managers		46	0.50	\$350.00	\$175.00
01/21/2021	Richard Gluck	Senior Counsel		46	0.25	\$800.00	\$200.00
01/21/2021	Richard Gluck	Senior Counsel		46	3.75	\$800.00	\$3,000.00
01/21/2021	Richard Gluck	Senior Counsel		46	1.75	\$800.00	\$1,400.00
01/21/2021	Ryan Dykhous	Associate		46	0.75	\$425.00	\$318.75
01/22/2021	Richard Gluck	Senior Counsel		46	2.75	\$800.00	\$2,200.00
01/25/2021	Jose Echegaray	Case Managers		46	2.50	\$350.00	\$875.00
01/25/2021	Richard Gluck	Senior Counsel		46	2.75	\$800.00	\$2,200.00
01/25/2021	Richard Gluck	Senior Counsel		46	1.50	\$800.00	\$1,200.00
01/26/2021	Richard Gluck	Senior Counsel		46	1.25	\$800.00	\$1,000.00
01/26/2021	Richard Gluck	Senior Counsel		46	3.25	\$800.00	\$2,600.00
01/26/2021	Richard Gluck	Senior Counsel		46	2.00	\$800.00	\$1,600.00
01/27/2021	Jose Echegaray	Case Managers		46	0.75	\$350.00	\$262.50
01/27/2021	Richard Gluck	Senior Counsel		46	0.75	\$800.00	\$600.00
01/27/2021	Richard Gluck	Senior Counsel		46	7.50	\$800.00	\$6,000.00
01/27/2021	Richard Gluck	Senior Counsel		46	2.50	\$800.00	\$2,000.00
01/27/2021	Ryan Candee	Senior Staff Attorneys		46	9.50	\$425.00	\$4,037.50

01/27/2021	Ryan Dykhous	Associate		46	1.25	\$425.00	\$531.25
01/28/2021	Richard Gluck	Senior Counsel		46	4.50	\$800.00	\$3,600.00
01/28/2021	Richard Gluck	Senior Counsel		46	1.25	\$800.00	\$1,000.00
01/28/2021	Richard Gluck	Senior Counsel		46	4.25	\$800.00	\$3,400.00
01/28/2021	Richard Gluck	Senior Counsel		46	2.75	\$800.00	\$2,200.00
01/29/2021	Richard Gluck	Senior Counsel		46	8.75	\$800.00	\$7,000.00
01/29/2021	Ryan Candee	Senior Staff Attorneys		46	9.50	\$425.00	\$4,037.50
01/29/2021	Ryan Dykhous	Associate		46	8.25	\$425.00	\$3,506.25
				TOTALS FOR PROJECT #46:		135.75	\$77,975.00

Project #47: Deposition of Anita Sands (March 1, 2021). Ms. Sands was a member of Symantec Board of Directors and a member of the Board's Audit Committee. Lead Counsel spent a total of 71 hours preparing for and taking the deposition, resulting in \$37,887.50 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and seven hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the partner who took the deposition and an associate who assisted and handled the exhibits. Five attorneys attended for Defendants, including three partners and two associates.

Date	Professional	Prof Type		Project Number	Hours	Rate	Lodestar	
12/17/2020	Daniel Renehan	Staff Attorney		47	5.50	\$400.00	\$2,200.00	
12/17/2020	Esinam Quarco	Staff Attorney		47	10.50	\$400.00	\$4,200.00	
12/17/2020	Ryan Candee	Senior Staff Attorneys		47	7.00	\$425.00	\$2,975.00	
12/18/2020	Esinam Quarco	Staff Attorney		47	9.00	\$400.00	\$3,600.00	
01/04/2021	Richard Gluck	Senior Counsel		47	0.25	\$800.00	\$200.00	
02/19/2021	Jose Echegaray	Case Managers		47	1.00	\$350.00	\$350.00	
02/19/2021	Lauren Cormier	Staff Attorney		47	4.00	\$375.00	\$1,500.00	
02/24/2021	Jose Echegaray	Case Managers		47	1.00	\$350.00	\$350.00	
02/26/2021	Jeremy Robinson	Partner		47	3.50	\$900.00	\$3,150.00	
02/27/2021	Jose Echegaray	Case Managers		47	0.25	\$350.00	\$87.50	
02/28/2021	Jose Echegaray	Case Managers		47	5.50	\$350.00	\$1,925.00	
02/28/2021	Lawrence Hosmer	Senior Staff Attorneys		47	1.00	\$425.00	\$425.00	
02/28/2021	Jeremy Robinson	Partner		47	6.50	\$900.00	\$5,850.00	
03/01/2021	Ryan Dykhouse	Associate		47	7.00	\$425.00	\$2,975.00	
03/01/2021	Jeremy Robinson	Partner		47	9.00	\$900.00	\$8,100.00	
				TOTALS FOR PROJECT #47:			71.00	\$37,887.50

Project #48: Work with Compensation Expert Wayne R. Guay and Preparation of His Expert Reports. Dr. Guay was Lead Plaintiff's executive compensation expert. Lead Counsel spent a total of 37 hours, with a lodestar of \$30,587.50 consulting with Dr. Guay during the litigation and working with him in connection with the preparation of his opening and reply expert reports.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
10/12/2020	Rebecca Boon	Partner		48	1.00	\$875.00	\$875.00
10/13/2020	Rebecca Boon	Partner		48	1.00	\$875.00	\$875.00
10/22/2020	Rebecca Boon	Partner		48	0.50	\$875.00	\$437.50
10/23/2020	Ryan Dykhous	Associate		48	1.00	\$425.00	\$425.00
12/09/2020	Richard Gluck	Senior Counsel		48	1.00	\$800.00	\$800.00
12/09/2020	Richard Gluck	Senior Counsel		48	0.25	\$800.00	\$200.00
12/23/2020	Richard Gluck	Senior Counsel		48	0.50	\$800.00	\$400.00
01/05/2021	Richard Gluck	Senior Counsel		48	0.25	\$800.00	\$200.00
01/15/2021	Richard Gluck	Senior Counsel		48	0.25	\$800.00	\$200.00
01/18/2021	Rebecca Boon	Partner		48	3.00	\$875.00	\$2,625.00
01/20/2021	Richard Gluck	Senior Counsel		48	1.25	\$800.00	\$1,000.00
01/20/2021	Ryan Dykhous	Associate		48	0.50	\$425.00	\$212.50
01/22/2021	Richard Gluck	Senior Counsel		48	1.25	\$800.00	\$1,000.00
01/25/2021	Jeremy Robinson	Partner		48	10.00	\$900.00	\$9,000.00
01/26/2021	Richard Gluck	Senior Counsel		48	1.25	\$800.00	\$1,000.00
01/29/2021	Ryan Dykhous	Associate		48	1.50	\$425.00	\$637.50
01/29/2021	Jeremy Robinson	Partner		48	3.00	\$900.00	\$2,700.00
02/17/2021	Richard Gluck	Senior Counsel		48	1.50	\$800.00	\$1,200.00
02/17/2021	Richard Gluck	Senior Counsel		48	1.25	\$800.00	\$1,000.00
02/18/2021	Richard Gluck	Senior Counsel		48	1.25	\$800.00	\$1,000.00
02/18/2021	Jeremy Robinson	Partner		48	4.00	\$900.00	\$3,600.00
02/19/2021	Richard Gluck	Senior Counsel		48	1.50	\$800.00	\$1,200.00
			TOTALS FOR PROJECT #48:		37.00		\$30,587.50

Project #49: Expert Deposition of Wayne R. Guay (February 24, 2021). Lead Counsel also spent a total of 35.25 hours in preparing Dr. Guay for and defending the deposition, resulting in \$19,018.75 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing documents Defendants were likely to use at the deposition, meeting with Dr. Guay and engaging in mock cross-examination sessions, and 5.5 hours defending the deposition. One associate from Lead Counsel attended and defended the deposition. Four attorneys attended for Defendants, including one partner, one counsel, and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
02/03/2021	Richard Gluck	Senior Counsel		49	0.25	\$800.00	\$200.00
02/03/2021	Richard Gluck	Senior Counsel		49	1.00	\$800.00	\$800.00
02/09/2021	Richard Gluck	Senior Counsel		49	1.00	\$800.00	\$800.00
02/16/2021	Richard Gluck	Senior Counsel		49	0.50	\$800.00	\$400.00
02/19/2021	Ryan Candee	Senior Staff Attorneys		49	9.50	\$425.00	\$4,037.50
02/21/2021	Ryan Candee	Senior Staff Attorneys		49	2.25	\$425.00	\$956.25
02/22/2021	Richard Gluck	Senior Counsel		49	2.75	\$800.00	\$2,200.00
02/22/2021	Richard Gluck	Senior Counsel		49	2.75	\$800.00	\$2,200.00
02/22/2021	Ryan Candee	Senior Staff Attorneys		49	5.00	\$425.00	\$2,125.00
02/22/2021	Jeremy Robinson	Partner		49	1.00	\$900.00	\$900.00
02/23/2021	Richard Gluck	Senior Counsel		49	1.25	\$800.00	\$1,000.00
02/24/2021	Ryan Dykhouse	Associate		49	8.00	\$425.00	\$3,400.00
				TOTALS FOR PROJECT #49:		35.25	

Project #50: Work with Economic Expert Michael Hartzmark and Preparation of His Expert Reports. Dr. Hartzmark was Lead Plaintiff's economic expert, opining on market efficiency, loss-causation, and damages. Lead Counsel spent a total of 54.25 hours, with a lodestar of \$45,493.75 consulting with Dr. Hartzmark during the litigation and working with him in connection with the preparation of his opening and reply expert reports.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
07/30/2020	Ryan Dykhous	Associate		50	1.25	\$425.00	\$531.25
12/04/2020	Ryan Dykhous	Associate		50	0.50	\$425.00	\$212.50
12/31/2020	Richard Gluck	Senior Counsel		50	1.00	\$800.00	\$800.00
01/06/2021	Richard Gluck	Senior Counsel		50	1.25	\$800.00	\$1,000.00
01/06/2021	Ryan Dykhous	Associate		50	0.50	\$425.00	\$212.50
01/14/2021	Richard Gluck	Senior Counsel		50	1.50	\$800.00	\$1,200.00

01/20/2021	Richard Gluck	Senior Counsel		50	2.25	\$800.00	\$1,800.00
01/24/2021	Jeremy Robinson	Partner		50	5.00	\$900.00	\$4,500.00
01/27/2021	Jeremy Robinson	Partner		50	9.00	\$900.00	\$8,100.00
01/28/2021	Jeremy Robinson	Partner		50	11.00	\$900.00	\$9,900.00
01/29/2021	Richard Gluck	Senior Counsel		50	3.00	\$800.00	\$2,400.00
01/29/2021	Ryan Dykhhouse	Associate		50	1.50	\$425.00	\$637.50
02/15/2021	Jeremy Robinson	Partner		50	2.00	\$900.00	\$1,800.00
02/17/2021	Richard Gluck	Senior Counsel		50	2.00	\$800.00	\$1,600.00
02/17/2021	Richard Gluck	Senior Counsel		50	1.00	\$800.00	\$800.00
02/18/2021	Richard Gluck	Senior Counsel		50	1.25	\$800.00	\$1,000.00
02/18/2021	Jeremy Robinson	Partner		50	5.00	\$900.00	\$4,500.00
02/19/2021	Richard Gluck	Senior Counsel		50	1.50	\$800.00	\$1,200.00
02/19/2021	Richard Gluck	Senior Counsel		50	0.75	\$800.00	\$600.00
02/19/2021	Jeremy Robinson	Partner		50	3.00	\$900.00	\$2,700.00
TOTALS FOR PROJECT #50:					54.25		\$45,493.75

Project #51: Expert Deposition of Michael Hartzmark (February 25, 2021). Lead Counsel spent a total of 49 hours in preparing Dr. Hartzmark for and defending the deposition, resulting in \$36,243.75 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing documents that Defendants were likely to use at the deposition, meeting with Dr. Hartzmark and engaging in mock cross-examination sessions, and over 6.5 hours defending the deposition. One senior counsel from Lead Counsel attended and defended the deposition. Four attorneys attended for Defendants, including one partner, one counsel, and one associate.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
02/03/2021	Richard Gluck	Senior Counsel		51	0.25	\$800.00	\$200.00
02/03/2021	Richard Gluck	Senior Counsel		51	1.25	\$800.00	\$1,000.00
02/09/2021	Richard Gluck	Senior Counsel		51	1.75	\$800.00	\$1,400.00
02/10/2021	Jose Echegaray	Case Managers		51	0.75	\$350.00	\$262.50
02/16/2021	Richard Gluck	Senior Counsel		51	0.50	\$800.00	\$400.00
02/18/2021	Lawrence Hosmer	Senior Staff Attorneys		51	2.75	\$425.00	\$1,168.75
02/19/2021	Jose Echegaray	Case Managers		51	0.50	\$350.00	\$175.00
02/19/2021	Lawrence Hosmer	Senior Staff Attorneys		51	2.50	\$425.00	\$1,062.50
02/20/2021	Lawrence Hosmer	Senior Staff Attorneys		51	1.00	\$425.00	\$425.00
02/21/2021	Lawrence Hosmer	Senior Staff Attorneys		51	2.00	\$425.00	\$850.00
02/22/2021	Richard Gluck	Senior Counsel		51	3.50	\$800.00	\$2,800.00
02/22/2021	Richard Gluck	Senior Counsel		51	1.75	\$800.00	\$1,400.00

02/23/2021	Richard Gluck	Senior Counsel		51	2.75	\$800.00	\$2,200.00
02/23/2021	Richard Gluck	Senior Counsel		51	2.50	\$800.00	\$2,000.00
02/23/2021	Jeremy Robinson	Partner		51	3.00	\$900.00	\$2,700.00
02/24/2021	Richard Gluck	Senior Counsel		51	1.25	\$800.00	\$1,000.00
02/24/2021	Richard Gluck	Senior Counsel		51	7.75	\$800.00	\$6,200.00
02/24/2021	Jeremy Robinson	Partner		51	4.00	\$900.00	\$3,600.00
02/25/2021	Richard Gluck	Senior Counsel		51	8.25	\$800.00	\$6,600.00
02/25/2021	Richard Gluck	Senior Counsel		51	1.00	\$800.00	\$800.00
			TOTALS FOR PROJECT #51:		49.00		\$36,243.75

Project #52: Work with Accounting Expert Andrew Mintzer and Preparation of His Expert Reports. Mr. Mintzer was Lead Plaintiff's accounting expert. Lead Counsel spent a total of 107.75 hours, with a lodestar of \$85,018.75 consulting with Mr. Mintzer during the litigation and working with him in connection with the preparation of his opening and reply expert reports.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
01/03/2019	Rebecca Boon	Partner		52	0.25	\$875.00	\$218.75
07/13/2020	Ryan Dykhous	Associate		52	1.25	\$425.00	\$531.25
07/27/2020	Jeremy Robinson	Partner		52	2.50	\$900.00	\$2,250.00
07/28/2020	Jeremy Robinson	Partner		52	4.00	\$900.00	\$3,600.00
07/28/2020	Jeremy Robinson	Partner		52	0.50	\$900.00	\$450.00
07/30/2020	Jeremy Robinson	Partner		52	5.50	\$900.00	\$4,950.00
07/31/2020	Jeremy Robinson	Partner		52	8.50	\$900.00	\$7,650.00
08/01/2020	Jeremy Robinson	Partner		52	1.50	\$900.00	\$1,350.00
08/03/2020	Jeremy Robinson	Partner		52	3.50	\$900.00	\$3,150.00
08/04/2020	Jeremy Robinson	Partner		52	4.50	\$900.00	\$4,050.00
08/05/2020	Jeremy Robinson	Partner		52	3.50	\$900.00	\$3,150.00
08/12/2020	Jeremy Robinson	Partner		52	4.50	\$900.00	\$4,050.00

11/03/2020	Jeremy Robinson	Partner		52	2.50	\$900.00	\$2,250.00
12/04/2020	Ryan Dykhous	Associate		52	0.50	\$425.00	\$212.50
12/07/2020	Richard Gluck	Senior Counsel		52	1.00	\$800.00	\$800.00
12/07/2020	Ryan Dykhous	Associate		52	1.00	\$425.00	\$425.00
12/09/2020	Richard Gluck	Senior Counsel		52	0.25	\$800.00	\$200.00
12/18/2020	Richard Gluck	Senior Counsel		52	0.25	\$800.00	\$200.00
12/30/2020	Richard Gluck	Senior Counsel		52	0.25	\$800.00	\$200.00
01/05/2021	Richard Gluck	Senior Counsel		52	0.50	\$800.00	\$400.00
01/06/2021	Ryan Dykhous	Associate		52	0.50	\$425.00	\$212.50
01/08/2021	Richard Gluck	Senior Counsel		52	0.25	\$800.00	\$200.00
01/14/2021	Ryan Dykhous	Associate		52	1.00	\$425.00	\$425.00
01/15/2021	Stephen Imundo	Senior Staff Attorneys		52	2.75	\$425.00	\$1,168.75
01/20/2021	Richard Gluck	Senior Counsel		52	0.75	\$800.00	\$600.00
01/20/2021	Ryan Dykhous	Associate		52	0.50	\$425.00	\$212.50
01/21/2021	Richard Gluck	Senior Counsel		52	1.75	\$800.00	\$1,400.00
01/21/2021	Stephen Imundo	Senior Staff Attorneys		52	4.00	\$425.00	\$1,700.00
01/22/2021	Richard Gluck	Senior Counsel		52	2.25	\$800.00	\$1,800.00
01/23/2021	Jeremy Robinson	Partner		52	4.00	\$900.00	\$3,600.00
01/26/2021	Richard Gluck	Senior Counsel		52	1.00	\$800.00	\$800.00
01/26/2021	Jeremy Robinson	Partner		52	11.00	\$900.00	\$9,900.00
01/28/2021	Stephen Imundo	Senior Staff Attorneys		52	5.25	\$425.00	\$2,231.25
01/29/2021	Ryan Dykhous	Associate		52	1.25	\$425.00	\$531.25
01/29/2021	Jeremy Robinson	Partner		52	2.00	\$900.00	\$1,800.00
02/15/2021	Richard Gluck	Senior Counsel		52	1.50	\$800.00	\$1,200.00
02/15/2021	Richard Gluck	Senior Counsel		52	2.50	\$800.00	\$2,000.00
02/15/2021	Stephen Imundo	Senior Staff Attorneys		52	2.00	\$425.00	\$850.00
02/16/2021	Jeremy Robinson	Partner		52	2.00	\$900.00	\$1,800.00
02/17/2021	Richard Gluck	Senior Counsel		52	1.50	\$800.00	\$1,200.00

02/18/2021	Richard Gluck	Senior Counsel		52	2.75	\$800.00	\$2,200.00
02/18/2021	Richard Gluck	Senior Counsel		52	1.00	\$800.00	\$800.00
02/18/2021	Richard Gluck	Senior Counsel		52	1.75	\$800.00	\$1,400.00
02/19/2021	Richard Gluck	Senior Counsel		52	2.25	\$800.00	\$1,800.00
02/19/2021	Richard Gluck	Senior Counsel		52	0.50	\$800.00	\$400.00
02/19/2021	Richard Gluck	Senior Counsel		52	1.50	\$800.00	\$1,200.00
02/19/2021	Richard Gluck	Senior Counsel		52	1.00	\$800.00	\$800.00
02/19/2021	Jeremy Robinson	Partner		52	3.00	\$900.00	\$2,700.00
			TOTALS FOR PROJECT #52:		107.75		\$85,018.75

Project #53: Expert Deposition of Andrew Mintzer (March 2, 2021). Lead Counsel spent a total of 122 hours in preparing Mr. Mintzer for and defending the deposition, resulting in \$66,800 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing documents Defendants were likely to use at the deposition, meeting with Mr. Mintzer and engaging in mock cross-examination sessions, and over six hours defending the deposition. One senior counsel from Lead Counsel attended and defended the deposition. Four attorneys attended for Defendants, including two partners and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
11/03/2020	Richard Gluck	Senior Counsel		53	0.50	\$800.00	\$400.00
11/03/2020	Rebecca Boon	Partner		53	0.50	\$875.00	\$437.50
02/03/2021	Richard Gluck	Senior Counsel		53	0.25	\$800.00	\$200.00
02/03/2021	Richard Gluck	Senior Counsel		53	1.00	\$800.00	\$800.00
02/16/2021	Richard Gluck	Senior Counsel		53	0.25	\$800.00	\$200.00
02/18/2021	Andrew Boruch	Senior Staff Attorneys		53	4.75	\$425.00	\$2,018.75
02/19/2021	Andrew Boruch	Senior Staff Attorneys		53	8.50	\$425.00	\$3,612.50
02/22/2021	Andrew Boruch	Senior Staff Attorneys		53	10.25	\$425.00	\$4,356.25
02/22/2021	Ryan Candee	Senior Staff Attorneys		53	4.75	\$425.00	\$2,018.75
02/23/2021	Andrew Boruch	Senior Staff Attorneys		53	9.50	\$425.00	\$4,037.50
02/23/2021	Jose Echegaray	Case Managers		53	4.00	\$350.00	\$1,400.00
02/23/2021	Ryan Candee	Senior Staff Attorneys		53	3.75	\$425.00	\$1,593.75
02/24/2021	Andrew Boruch	Senior Staff Attorneys		53	9.25	\$425.00	\$3,931.25
02/24/2021	Jose Echegaray	Case Managers		53	0.50	\$350.00	\$175.00
02/24/2021	Richard Gluck	Senior Counsel		53	0.50	\$800.00	\$400.00
02/24/2021	Ryan Candee	Senior Staff Attorneys		53	9.25	\$425.00	\$3,931.25
02/25/2021	Andrew Boruch	Senior Staff Attorneys		53	9.75	\$425.00	\$4,143.75

02/25/2021	Richard Gluck	Senior Counsel		53	2.00	\$800.00	\$1,600.00
02/25/2021	Ryan Dykhous	Associate		53	1.25	\$425.00	\$531.25
02/26/2021	Richard Gluck	Senior Counsel		53	8.75	\$800.00	\$7,000.00
02/26/2021	Ryan Dykhous	Associate		53	7.00	\$425.00	\$2,975.00
02/26/2021	Jeremy Robinson	Partner		53	3.50	\$900.00	\$3,150.00
02/28/2021	Richard Gluck	Senior Counsel		53	3.25	\$800.00	\$2,600.00
02/28/2021	Ryan Dykhous	Associate		53	1.50	\$425.00	\$637.50
02/28/2021	Jeremy Robinson	Partner		53	6.50	\$900.00	\$5,850.00
03/01/2021	Richard Gluck	Senior Counsel		53	2.00	\$800.00	\$1,600.00
03/02/2021	Richard Gluck	Senior Counsel		53	8.25	\$800.00	\$6,600.00
03/23/2021	Richard Gluck	Senior Counsel		53	0.75	\$800.00	\$600.00
				TOTALS FOR PROJECT #53:		122.00	

Project #54: Expert Deposition of Todd Milbourn (March 3, 2021). Dr. Milbourn was Defendants' expert on executive compensation plans. Lead Counsel spent a total of 77.5 hours preparing for and taking the deposition, resulting in \$34,362.50 in lodestar. The work, the details of which are broken down chronologically below, included reviewing the expert report he submitted, preparing an examination outline, and five hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the associate who took the deposition and a staff attorney who assisted and handled the exhibits. Four attorneys attended for Defendants, including two partners, one counsel, and one associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar	
02/13/2021	Richard Gluck	Senior Counsel		54	2.00	\$800.00	\$1,600.00	
02/16/2021	Richard Gluck	Senior Counsel		54	2.50	\$800.00	\$2,000.00	
02/23/2021	Ryan Candee	Senior Staff Attorneys		54	3.75	\$425.00	\$1,593.75	
02/25/2021	Ryan Candee	Senior Staff Attorneys		54	10.25	\$425.00	\$4,356.25	
02/26/2021	Ryan Candee	Senior Staff Attorneys		54	5.25	\$425.00	\$2,231.25	
02/28/2021	Ryan Dykhouse	Associate		54	1.50	\$425.00	\$637.50	
03/01/2021	Jose Echegaray	Case Managers		54	3.50	\$350.00	\$1,225.00	
03/01/2021	Ryan Candee	Senior Staff Attorneys		54	4.75	\$425.00	\$2,018.75	
03/01/2021	Ryan Dykhouse	Associate		54	4.00	\$425.00	\$1,700.00	
03/02/2021	Lawrence Hosmer	Senior Staff Attorneys		54	4.00	\$425.00	\$1,700.00	
03/02/2021	Ryan Candee	Senior Staff Attorneys		54	5.50	\$425.00	\$2,337.50	
03/02/2021	Ryan Dykhouse	Associate		54	13.00	\$425.00	\$5,525.00	
03/03/2021	Ryan Candee	Senior Staff Attorneys		54	8.50	\$425.00	\$3,612.50	
03/03/2021	Ryan Dykhouse	Associate		54	9.00	\$425.00	\$3,825.00	
				TOTALS FOR PROJECT #54:			77.50	

Project #55: Expert Deposition of Howard Scheck (March 4, 2021). Mr. Scheck was defendants' accounting expert. Lead Counsel spent a total of 68.5 hours preparing for and taking the deposition, resulting in \$48,968.75 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and six hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the senior counsel who took the deposition and an associate who assisted and handled the exhibits. Four attorneys attended for Defendants, including two partners and two associates.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
02/12/2021	Richard Gluck	Senior Counsel		55	2.00	\$800.00	\$1,600.00
02/16/2021	Richard Gluck	Senior Counsel		55	3.50	\$800.00	\$2,800.00
02/23/2021	Richard Gluck	Senior Counsel		55	2.75	\$800.00	\$2,200.00
02/27/2021	Jose Echegaray	Case Managers		55	0.25	\$350.00	\$87.50
02/27/2021	Richard Gluck	Senior Counsel		55	6.75	\$800.00	\$5,400.00
02/28/2021	Richard Gluck	Senior Counsel		55	2.25	\$800.00	\$1,800.00
03/01/2021	Richard Gluck	Senior Counsel		55	6.75	\$800.00	\$5,400.00
03/01/2021	Richard Gluck	Senior Counsel		55	2.50	\$800.00	\$2,000.00
03/01/2021	Richard Gluck	Senior Counsel		55	0.50	\$800.00	\$400.00
03/02/2021	Richard Gluck	Senior Counsel		55	4.25	\$800.00	\$3,400.00
03/02/2021	Ryan Candee	Senior Staff Attorneys		55	5.25	\$425.00	\$2,231.25
03/02/2021	Ryan Dykhouse	Associate		55	2.00	\$425.00	\$850.00
03/03/2021	Richard Gluck	Senior Counsel		55	11.50	\$800.00	\$9,200.00
03/03/2021	Richard Gluck	Senior Counsel		55	1.00	\$800.00	\$800.00
03/04/2021	Richard Gluck	Senior Counsel		55	9.25	\$800.00	\$7,400.00
03/04/2021	Ryan Dykhouse	Associate		55	8.00	\$425.00	\$3,400.00
				TOTALS FOR PROJECT #55:		68.50	

Project #56: Expert Deposition of Douglas Skinner (March 5, 2021). Dr. Skinner was Defendants' economic expert, retained to rebut Lead Plaintiff's economic expert's opinions on damages and loss causation. Lead Counsel spent a total of 67 hours preparing for and taking the deposition, resulting in \$48,681.25 in lodestar. The work, the details of which are broken down chronologically below, included work reviewing and culling potential exhibits, preparing an examination outline, and nearly seven hours of questioning the witness on the record. Two attorneys from Lead Counsel attended the deposition, the partner who took the deposition and an associate who assisted and handled the exhibits. Three attorneys attended for Defendants, including one partner, one counsel, and one associate.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
02/13/2021	Richard Gluck	Senior Counsel		56	1.75	\$800.00	\$1,400.00
02/16/2021	Richard Gluck	Senior Counsel		56	1.50	\$800.00	\$1,200.00
03/01/2021	Jeremy Robinson	Partner		56	3.00	\$900.00	\$2,700.00
03/02/2021	Jeremy Robinson	Partner		56	13.00	\$900.00	\$11,700.00
03/04/2021	Jose Echegaray	Case Managers		56	6.50	\$350.00	\$2,275.00

03/04/2021	Lawrence Hosmer	Senior Staff Attorneys		56	7.25	\$425.00	\$3,081.25
03/04/2021	Ryan Dykhous	Associate		56	2.00	\$425.00	\$850.00
03/04/2021	Jeremy Robinson	Partner		56	13.00	\$900.00	\$11,700.00
03/05/2021	Ryan Dykhous	Associate		56	7.00	\$425.00	\$2,975.00
03/05/2021	Jeremy Robinson	Partner		56	12.00	\$900.00	\$10,800.00
				TOTALS FOR PROJECT #56:		67.00	\$48,681.25

Project #57: Ongoing Settlement Negotiations. After the September 14, 2020 settlement conference with Judge Ryu and prior to the second such conference on May 24, 2021, Lead Counsel and counsel for Defendants had ongoing, intermittent discussions concerning the possibility of settlement. Lead Counsel spent a total of 10.5 hours with a lodestar of \$11,868.75 in connection with these ongoing settlement negotiations during that period, including internal discussions concerning settlement, as well as with Defendants' Counsel.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
10/06/2020	Salvatore Graziano	Partner		57	0.50	\$1,150.00	\$575.00
10/07/2020	Salvatore Graziano	Partner		57	0.50	\$1,150.00	\$575.00
10/09/2020	Salvatore Graziano	Partner		57	1.00	\$1,150.00	\$1,150.00
10/10/2020	Salvatore Graziano	Partner		57	0.75	\$1,150.00	\$862.50
10/11/2020	Salvatore Graziano	Partner		57	0.50	\$1,150.00	\$575.00
10/12/2020	Salvatore Graziano	Partner		57	1.50	\$1,150.00	\$1,725.00
10/13/2020	Salvatore Graziano	Partner		57	1.00	\$1,150.00	\$1,150.00
10/13/2020	Rebecca Boon	Partner		57	0.75	\$875.00	\$656.25
10/14/2020	Salvatore Graziano	Partner		57	1.00	\$1,150.00	\$1,150.00
10/16/2020	Salvatore Graziano	Partner		57	0.50	\$1,150.00	\$575.00
10/19/2020	Salvatore Graziano	Partner		57	0.50	\$1,150.00	\$575.00
10/20/2020	Salvatore Graziano	Partner		57	0.50	\$1,150.00	\$575.00
01/26/2021	Salvatore Graziano	Partner		57	1.50	\$1,150.00	\$1,725.00
				TOTALS FOR PROJECT #57:		10.50	\$11,868.75

Project #58: Opposition to Motion for Summary Judgment (March 18, 2021). Defendants filed their motion for summary judgment on March 4, 2021 and Lead Plaintiff filed its opposition on March 18, 2021; and Defendants filed their reply papers on March 25, 2021. Lead Counsel spent a total of 2,827.25 hours with a lodestar of \$1,303,300.00 in connection with Defendants' summary judgment motion. This work, the details of which are broken down chronologically below, included an extensive review and analysis of the documentary evidence and testimony gathered to locate the best evidence in opposition to summary judgment, preparing detailed statements of fact, researching and preparing an extensive opposition brief, and preparing electronic versions of the briefs filed. It also includes related work on scheduling issues, and arranging for filing of certain documents under seal. This work also includes Lead Counsel's extensive preparation for oral argument on Defendants' summary judgment motion, until it was eventually continued to July 7, 2021.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
02/02/2021	Richard Gluck	Senior Counsel		58	0.75	\$800.00	\$600.00
02/02/2021	Richard Gluck	Senior Counsel		58	0.25	\$800.00	\$200.00

02/02/2021	Stephen Imundo	Senior Staff Attorneys		58	8.50	\$425.00	\$3,612.50
02/03/2021	Stephen Imundo	Senior Staff Attorneys		58	7.00	\$425.00	\$2,975.00
02/04/2021	Richard Gluck	Senior Counsel		58	1.25	\$800.00	\$1,000.00
02/05/2021	Stephen Imundo	Senior Staff Attorneys		58	8.50	\$425.00	\$3,612.50
02/07/2021	Stephen Imundo	Senior Staff Attorneys		58	2.50	\$425.00	\$1,062.50
02/08/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
02/08/2021	Erick Ladson	Staff Attorney		58	9.00	\$400.00	\$3,600.00
02/08/2021	Stephen Imundo	Senior Staff Attorneys		58	8.75	\$425.00	\$3,718.75
02/09/2021	Erick Ladson	Staff Attorney		58	9.50	\$400.00	\$3,800.00
02/09/2021	Stephen Imundo	Senior Staff Attorneys		58	8.50	\$425.00	\$3,612.50
02/10/2021	Erick Ladson	Staff Attorney		58	9.00	\$400.00	\$3,600.00
02/10/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
02/10/2021	Richard Gluck	Senior Counsel		58	0.25	\$800.00	\$200.00
02/10/2021	Stephen Imundo	Senior Staff Attorneys		58	8.00	\$425.00	\$3,400.00
02/11/2021	Erick Ladson	Staff Attorney		58	7.50	\$400.00	\$3,000.00
02/11/2021	Stephen Imundo	Senior Staff Attorneys		58	4.00	\$425.00	\$1,700.00
02/12/2021	Erick Ladson	Staff Attorney		58	5.00	\$400.00	\$2,000.00
02/12/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
02/12/2021	Stephen Imundo	Senior Staff Attorneys		58	6.00	\$425.00	\$2,550.00
02/13/2021	Salvatore Graziano	Partner		58	0.50	\$1,150.00	\$575.00
02/14/2021	Stephen Imundo	Senior Staff Attorneys		58	2.50	\$425.00	\$1,062.50

02/14/2021	Salvatore Graziano	Partner		58	0.50	\$1,150.00	\$575.00
02/16/2021	Erick Ladson	Staff Attorney		58	8.50	\$400.00	\$3,400.00
02/16/2021	Helen Fikrey	Staff Attorney		58	8.50	\$400.00	\$3,400.00
02/16/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
02/17/2021	Helen Fikrey	Staff Attorney		58	9.25	\$400.00	\$3,700.00
02/17/2021	Jed Koslow	Staff Attorney		58	2.75	\$400.00	\$1,100.00
02/17/2021	Jed Koslow	Staff Attorney		58	9.25	\$400.00	\$3,700.00
02/17/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
02/18/2021	Erick Ladson	Staff Attorney		58	11.50	\$400.00	\$4,600.00
02/18/2021	Helen Fikrey	Staff Attorney		58	10.25	\$400.00	\$4,100.00
02/18/2021	Jed Koslow	Staff Attorney		58	11.25	\$400.00	\$4,500.00
02/18/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
02/19/2021	Erick Ladson	Staff Attorney		58	9.00	\$400.00	\$3,600.00
02/19/2021	Jed Koslow	Staff Attorney		58	5.50	\$400.00	\$2,200.00
02/19/2021	Lauren Cormier	Staff Attorney		58	4.00	\$375.00	\$1,500.00
02/21/2021	Erick Ladson	Staff Attorney		58	2.00	\$400.00	\$800.00
02/22/2021	Addison F. Golladay	Staff Attorney		58	8.00	\$400.00	\$3,200.00
02/22/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
02/22/2021	Erick Ladson	Staff Attorney		58	8.50	\$400.00	\$3,400.00
02/22/2021	Helen Fikrey	Staff Attorney		58	2.00	\$400.00	\$800.00
02/22/2021	Jed Koslow	Staff Attorney		58	11.50	\$400.00	\$4,600.00
02/22/2021	Juan Lossada	Staff Attorney		58	8.00	\$400.00	\$3,200.00
02/22/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
02/22/2021	Stephen Imundo	Senior Staff Attorneys		58	5.00	\$425.00	\$2,125.00
02/23/2021	Addison F. Golladay	Staff Attorney		58	5.50	\$400.00	\$2,200.00

02/23/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
02/23/2021	Erick Ladson	Staff Attorney		58	8.50	\$400.00	\$3,400.00
02/23/2021	Helen Fikrey	Staff Attorney		58	8.75	\$400.00	\$3,500.00
02/23/2021	Jed Koslow	Staff Attorney		58	9.50	\$400.00	\$3,800.00
02/23/2021	Juan Lossada	Staff Attorney		58	8.00	\$400.00	\$3,200.00
02/23/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
02/23/2021	Stephen Imundo	Senior Staff Attorneys		58	9.00	\$425.00	\$3,825.00
02/24/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
02/24/2021	Erick Ladson	Staff Attorney		58	8.00	\$400.00	\$3,200.00
02/24/2021	Helen Fikrey	Staff Attorney		58	5.00	\$400.00	\$2,000.00
02/24/2021	Jed Koslow	Staff Attorney		58	8.75	\$400.00	\$3,500.00
02/24/2021	Juan Lossada	Staff Attorney		58	8.00	\$400.00	\$3,200.00
02/24/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
02/24/2021	Stephen Imundo	Senior Staff Attorneys		58	9.50	\$425.00	\$4,037.50
02/25/2021	Addison F. Golladay	Staff Attorney		58	8.00	\$400.00	\$3,200.00
02/25/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
02/25/2021	Erick Ladson	Staff Attorney		58	8.00	\$400.00	\$3,200.00
02/25/2021	Jed Koslow	Staff Attorney		58	7.25	\$400.00	\$2,900.00
02/25/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
02/25/2021	Stephen Imundo	Senior Staff Attorneys		58	9.75	\$425.00	\$4,143.75
02/26/2021	Addison F. Golladay	Staff Attorney		58	8.00	\$400.00	\$3,200.00
02/26/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
02/26/2021	Erick Ladson	Staff Attorney		58	7.00	\$400.00	\$2,800.00
02/26/2021	Helen Fikrey	Staff Attorney		58	9.00	\$400.00	\$3,600.00
02/26/2021	Jed Koslow	Staff Attorney		58	3.00	\$400.00	\$1,200.00
02/26/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
02/26/2021	Stephen Imundo	Senior Staff Attorneys		58	6.50	\$425.00	\$2,762.50

02/27/2021	Addison F. Golladay	Staff Attorney		58	3.00	\$400.00	\$1,200.00
02/27/2021	Stephen Imundo	Senior Staff Attorneys		58	4.50	\$425.00	\$1,912.50
02/27/2021	Salvatore Graziano	Partner		58	0.50	\$1,150.00	\$575.00
02/28/2021	Addison F. Golladay	Staff Attorney		58	7.50	\$400.00	\$3,000.00
02/28/2021	Stephen Imundo	Senior Staff Attorneys		58	4.00	\$425.00	\$1,700.00
03/01/2021	Addison F. Golladay	Staff Attorney		58	6.75	\$400.00	\$2,700.00
03/01/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/01/2021	Erick Ladson	Staff Attorney		58	9.00	\$400.00	\$3,600.00
03/01/2021	Helen Fikrey	Staff Attorney		58	7.25	\$400.00	\$2,900.00
03/01/2021	Jed Koslow	Staff Attorney		58	10.75	\$400.00	\$4,300.00
03/01/2021	Juan Lossada	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/01/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
03/01/2021	Stephen Imundo	Senior Staff Attorneys		58	9.75	\$425.00	\$4,143.75
03/02/2021	Addison F. Golladay	Staff Attorney		58	6.75	\$400.00	\$2,700.00
03/02/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/02/2021	Erick Ladson	Staff Attorney		58	9.00	\$400.00	\$3,600.00
03/02/2021	Jed Koslow	Staff Attorney		58	8.50	\$400.00	\$3,400.00
03/02/2021	Juan Lossada	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/02/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
03/02/2021	Stephen Imundo	Senior Staff Attorneys		58	9.25	\$425.00	\$3,931.25
03/02/2021	Salvatore Graziano	Partner		58	0.50	\$1,150.00	\$575.00
03/03/2021	Addison F. Golladay	Staff Attorney		58	6.75	\$400.00	\$2,700.00
03/03/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/03/2021	Erick Ladson	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/03/2021	Helen Fikrey	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/03/2021	Jed Koslow	Staff Attorney		58	8.25	\$400.00	\$3,300.00
03/03/2021	Jose Echegaray	Case Managers		58	0.50	\$350.00	\$175.00

03/03/2021	Juan Lossada	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/03/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
03/03/2021	Richard Gluck	Senior Counsel		58	0.50	\$800.00	\$400.00
03/03/2021	Stephen Imundo	Senior Staff Attorneys		58	11.00	\$425.00	\$4,675.00
03/04/2021	Addison F. Golladay	Staff Attorney		58	6.75	\$400.00	\$2,700.00
03/04/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/04/2021	Erick Ladson	Staff Attorney		58	7.00	\$400.00	\$2,800.00
03/04/2021	Helen Fikrey	Staff Attorney		58	9.50	\$400.00	\$3,800.00
03/04/2021	Jed Koslow	Staff Attorney		58	8.50	\$400.00	\$3,400.00
03/04/2021	Jose Echegaray	Case Managers		58	1.25	\$350.00	\$437.50
03/04/2021	Juan Lossada	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/04/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
03/04/2021	Ryan Dykhous	Associate		58	2.00	\$425.00	\$850.00
03/05/2021	Addison F. Golladay	Staff Attorney		58	6.75	\$400.00	\$2,700.00
03/05/2021	Andrew Boruch	Senior Staff Attorneys		58	9.00	\$425.00	\$3,825.00
03/05/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/05/2021	Erick Ladson	Staff Attorney		58	7.00	\$400.00	\$2,800.00
03/05/2021	Helen Fikrey	Staff Attorney		58	8.50	\$400.00	\$3,400.00
03/05/2021	Jed Koslow	Staff Attorney		58	4.00	\$400.00	\$1,600.00
03/05/2021	Jose Echegaray	Case Managers		58	5.50	\$350.00	\$1,925.00
03/05/2021	Juan Lossada	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/05/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
03/05/2021	Lawrence Hosmer	Senior Staff Attorneys		58	9.50	\$425.00	\$4,037.50
03/05/2021	Richard Gluck	Senior Counsel		58	2.75	\$800.00	\$2,200.00

03/05/2021	Richard Gluck	Senior Counsel		58	3.50	\$800.00	\$2,800.00
03/05/2021	Ryan Candee	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/05/2021	Ryan Dykhous	Associate		58	4.00	\$425.00	\$1,700.00
03/05/2021	Stephen Imundo	Senior Staff Attorneys		58	6.50	\$425.00	\$2,762.50
03/05/2021	Salvatore Graziano	Partner		58	1.00	\$1,150.00	\$1,150.00
03/06/2021	Addison F. Golladay	Staff Attorney		58	3.50	\$400.00	\$1,400.00
03/06/2021	Andrew Boruch	Senior Staff Attorneys		58	4.25	\$425.00	\$1,806.25
03/06/2021	Ryan Dykhous	Associate		58	8.00	\$425.00	\$3,400.00
03/06/2021	Stephen Imundo	Senior Staff Attorneys		58	4.00	\$425.00	\$1,700.00
03/06/2021	Jeremy Robinson	Partner		58	5.00	\$900.00	\$4,500.00
03/07/2021	Addison F. Golladay	Staff Attorney		58	2.75	\$400.00	\$1,100.00
03/07/2021	Helen Fikrey	Staff Attorney		58	6.75	\$400.00	\$2,700.00
03/07/2021	Richard Gluck	Senior Counsel		58	3.50	\$800.00	\$2,800.00
03/07/2021	Ryan Candee	Senior Staff Attorneys		58	0.25	\$425.00	\$106.25
03/07/2021	Ryan Dykhous	Associate		58	5.00	\$425.00	\$2,125.00
03/07/2021	Ryan Dykhous	Associate		58	1.00	\$425.00	\$425.00
03/07/2021	Stephen Imundo	Senior Staff Attorneys		58	7.75	\$425.00	\$3,293.75
03/07/2021	Jeremy Robinson	Partner		58	4.00	\$900.00	\$3,600.00
03/08/2021	Addison F. Golladay	Staff Attorney		58	9.00	\$400.00	\$3,600.00
03/08/2021	Andrew Boruch	Senior Staff Attorneys		58	9.25	\$425.00	\$3,931.25
03/08/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/08/2021	Erick Ladson	Staff Attorney		58	8.50	\$400.00	\$3,400.00

03/08/2021	Helen Fikrey	Staff Attorney		58	10.00	\$400.00	\$4,000.00
03/08/2021	Jed Koslow	Staff Attorney		58	7.75	\$400.00	\$3,100.00
03/08/2021	Jed Koslow	Staff Attorney		58	2.25	\$400.00	\$900.00
03/08/2021	Jose Echegaray	Case Managers		58	5.00	\$350.00	\$1,750.00
03/08/2021	Jose Echegaray	Case Managers		58	0.25	\$350.00	\$87.50
03/08/2021	Juan Lossada	Staff Attorney		58	0.25	\$400.00	\$100.00
03/08/2021	Juan Lossada	Staff Attorney		58	2.75	\$400.00	\$1,100.00
03/08/2021	Juan Lossada	Staff Attorney		58	5.00	\$400.00	\$2,000.00
03/08/2021	Lauren Cormier	Staff Attorney		58	10.25	\$375.00	\$3,843.75
03/08/2021	Lawrence Hosmer	Senior Staff Attorneys		58	8.00	\$425.00	\$3,400.00
03/08/2021	Mahiri Buffong	Managing Clerk		58	1.25	\$375.00	\$468.75
03/08/2021	Michelle Leung	Case Managers		58	3.00	\$350.00	\$1,050.00
03/08/2021	Preya Rodriguez	Paralegal		58	3.00	\$325.00	\$975.00
03/08/2021	Richard Gluck	Senior Counsel		58	4.25	\$800.00	\$3,400.00
03/08/2021	Richard Gluck	Senior Counsel		58	0.50	\$800.00	\$400.00
03/08/2021	Richard Gluck	Senior Counsel		58	3.75	\$800.00	\$3,000.00
03/08/2021	Ryan Candee	Senior Staff Attorneys		58	7.50	\$425.00	\$3,187.50
03/08/2021	Ryan Dykhous	Associate		58	4.00	\$425.00	\$1,700.00
03/08/2021	Ryan Dykhous	Associate		58	0.75	\$425.00	\$318.75
03/08/2021	Ryan Dykhous	Associate		58	2.00	\$425.00	\$850.00
03/08/2021	Stephen Imundo	Senior Staff Attorneys		58	19.00	\$425.00	\$8,075.00
03/08/2021	Jeremy Robinson	Partner		58	5.00	\$900.00	\$4,500.00
03/08/2021	Rebecca Boon	Partner		58	1.00	\$875.00	\$875.00
03/09/2021	Addison F. Golladay	Staff Attorney		58	6.75	\$400.00	\$2,700.00
03/09/2021	Andrew Boruch	Senior Staff Attorneys		58	8.50	\$425.00	\$3,612.50

03/09/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/09/2021	Erick Ladson	Staff Attorney		58	11.00	\$400.00	\$4,400.00
03/09/2021	Helen Fikrey	Staff Attorney		58	8.25	\$400.00	\$3,300.00
03/09/2021	Jed Koslow	Staff Attorney		58	9.50	\$400.00	\$3,800.00
03/09/2021	Jose Echegaray	Case Managers		58	2.75	\$350.00	\$962.50
03/09/2021	Juan Lossada	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/09/2021	Lauren Cormier	Staff Attorney		58	10.00	\$375.00	\$3,750.00
03/09/2021	Lauren Cruz	Associate		58	1.25	\$550.00	\$687.50
03/09/2021	Lauren Cruz	Associate		58	6.75	\$550.00	\$3,712.50
03/09/2021	Lawrence Hosmer	Senior Staff Attorneys		58	8.75	\$425.00	\$3,718.75
03/09/2021	Richard Gluck	Senior Counsel		58	2.25	\$800.00	\$1,800.00
03/09/2021	Richard Gluck	Senior Counsel		58	0.50	\$800.00	\$400.00
03/09/2021	Richard Gluck	Senior Counsel		58	1.25	\$800.00	\$1,000.00
03/09/2021	Richard Gluck	Senior Counsel		58	4.50	\$800.00	\$3,600.00
03/09/2021	Richard Gluck	Senior Counsel		58	0.50	\$800.00	\$400.00
03/09/2021	Richard Gluck	Senior Counsel		58	2.00	\$800.00	\$1,600.00
03/09/2021	Ryan Candee	Senior Staff Attorneys		58	8.50	\$425.00	\$3,612.50
03/09/2021	Ryan Dykhous	Associate		58	6.00	\$425.00	\$2,550.00
03/09/2021	Stephen Imundo	Senior Staff Attorneys		58	7.50	\$425.00	\$3,187.50
03/09/2021	Jeremy Robinson	Partner		58	3.00	\$900.00	\$2,700.00
03/10/2021	Addison F. Golladay	Staff Attorney		58	6.75	\$400.00	\$2,700.00
03/10/2021	Andrew Boruch	Senior Staff Attorneys		58	9.50	\$425.00	\$4,037.50
03/10/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/10/2021	Erick Ladson	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/10/2021	Helen Fikrey	Staff Attorney		58	9.00	\$400.00	\$3,600.00
03/10/2021	Jed Koslow	Staff Attorney		58	10.00	\$400.00	\$4,000.00
03/10/2021	Jose Echegaray	Case Managers		58	3.25	\$350.00	\$1,137.50
03/10/2021	Juan Lossada	Staff Attorney		58	8.00	\$400.00	\$3,200.00

03/10/2021	Lauren Cormier	Staff Attorney		58	9.00	\$375.00	\$3,375.00
03/10/2021	Lauren Cruz	Associate		58	6.00	\$550.00	\$3,300.00
03/10/2021	Lawrence Hosmer	Senior Staff Attorneys		58	10.25	\$425.00	\$4,356.25
03/10/2021	Richard Gluck	Senior Counsel		58	11.75	\$800.00	\$9,400.00
03/10/2021	Ryan Candee	Senior Staff Attorneys		58	9.50	\$425.00	\$4,037.50
03/10/2021	Ryan Dykhous	Associate		58	4.00	\$425.00	\$1,700.00
03/10/2021	Ryan Dykhous	Associate		58	1.50	\$425.00	\$637.50
03/10/2021	Stephen Imundo	Senior Staff Attorneys		58	11.00	\$425.00	\$4,675.00
03/10/2021	Jeremy Robinson	Partner		58	12.00	\$900.00	\$10,800.00
03/11/2021	Addison F. Golladay	Staff Attorney		58	6.75	\$400.00	\$2,700.00
03/11/2021	Andrew Boruch	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/11/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/11/2021	Erick Ladson	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/11/2021	Helen Fikrey	Staff Attorney		58	10.25	\$400.00	\$4,100.00
03/11/2021	Jed Koslow	Staff Attorney		58	7.50	\$400.00	\$3,000.00
03/11/2021	Jose Echegaray	Case Managers		58	6.50	\$350.00	\$2,275.00
03/11/2021	Juan Lossada	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/11/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
03/11/2021	Lauren Cruz	Associate		58	4.00	\$550.00	\$2,200.00
03/11/2021	Lawrence Hosmer	Senior Staff Attorneys		58	9.25	\$425.00	\$3,931.25
03/11/2021	Richard Gluck	Senior Counsel		58	0.50	\$800.00	\$400.00
03/11/2021	Richard Gluck	Senior Counsel		58	0.25	\$800.00	\$200.00
03/11/2021	Richard Gluck	Senior Counsel		58	0.25	\$800.00	\$200.00
03/11/2021	Richard Gluck	Senior Counsel		58	10.00	\$800.00	\$8,000.00
03/11/2021	Richard Gluck	Senior Counsel		58	0.50	\$800.00	\$400.00
03/11/2021	Ryan Candee	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/11/2021	Ryan Dykhous	Associate		58	5.00	\$425.00	\$2,125.00

03/11/2021	Stephen Imundo	Senior Staff Attorneys		58	10.25	\$425.00	\$4,356.25
03/11/2021	Jeremy Robinson	Partner		58	9.00	\$900.00	\$8,100.00
03/12/2021	Addison F. Golladay	Staff Attorney		58	6.75	\$400.00	\$2,700.00
03/12/2021	Andrew Boruch	Senior Staff Attorneys		58	9.00	\$425.00	\$3,825.00
03/12/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/12/2021	Erick Ladson	Staff Attorney		58	4.50	\$400.00	\$1,800.00
03/12/2021	Helen Fikrey	Staff Attorney		58	1.25	\$400.00	\$500.00
03/12/2021	Jed Koslow	Staff Attorney		58	3.00	\$400.00	\$1,200.00
03/12/2021	Jose Echegaray	Case Managers		58	3.50	\$350.00	\$1,225.00
03/12/2021	Juan Lossada	Staff Attorney		58	10.50	\$400.00	\$4,200.00
03/12/2021	Lauren Cruz	Associate		58	6.00	\$550.00	\$3,300.00
03/12/2021	Lawrence Hosmer	Senior Staff Attorneys		58	10.75	\$425.00	\$4,568.75
03/12/2021	Richard Gluck	Senior Counsel		58	4.50	\$800.00	\$3,600.00
03/12/2021	Richard Gluck	Senior Counsel		58	3.75	\$800.00	\$3,000.00
03/12/2021	Richard Gluck	Senior Counsel		58	2.50	\$800.00	\$2,000.00
03/12/2021	Ryan Candee	Senior Staff Attorneys		58	8.00	\$425.00	\$3,400.00
03/12/2021	Ryan Dykhous	Associate		58	4.00	\$425.00	\$1,700.00
03/12/2021	Stephen Imundo	Senior Staff Attorneys		58	13.50	\$425.00	\$5,737.50
03/12/2021	Jeremy Robinson	Partner		58	9.00	\$900.00	\$8,100.00
03/13/2021	Addison F. Golladay	Staff Attorney		58	9.50	\$400.00	\$3,800.00
03/13/2021	Jose Echegaray	Case Managers		58	5.75	\$350.00	\$2,012.50
03/13/2021	Juan Lossada	Staff Attorney		58	4.00	\$400.00	\$1,600.00
03/13/2021	Lauren Cormier	Staff Attorney		58	9.00	\$375.00	\$3,375.00
03/13/2021	Lauren Cruz	Associate		58	5.00	\$550.00	\$2,750.00
03/13/2021	Lawrence Hosmer	Senior Staff Attorneys		58	8.50	\$425.00	\$3,612.50
03/13/2021	Richard Gluck	Senior Counsel		58	10.25	\$800.00	\$8,200.00
03/13/2021	Ryan Candee	Senior Staff Attorneys		58	5.50	\$425.00	\$2,337.50

03/13/2021	Ryan Dykhous	Associate		58	6.00	\$425.00	\$2,550.00
03/13/2021	Stephen Imundo	Senior Staff Attorneys		58	10.25	\$425.00	\$4,356.25
03/13/2021	Jeremy Robinson	Partner		58	14.00	\$900.00	\$12,600.00
03/14/2021	Addison F. Golladay	Staff Attorney		58	7.50	\$400.00	\$3,000.00
03/14/2021	Andrew Boruch	Senior Staff Attorneys		58	8.75	\$425.00	\$3,718.75
03/14/2021	Brian Chau	Senior Staff Attorneys		58	9.00	\$425.00	\$3,825.00
03/14/2021	Jose Echegaray	Case Managers		58	6.00	\$350.00	\$2,100.00
03/14/2021	Juan Lossada	Staff Attorney		58	14.50	\$400.00	\$5,800.00
03/14/2021	Lauren Cormier	Staff Attorney		58	8.25	\$375.00	\$3,093.75
03/14/2021	Lauren Cruz	Associate		58	3.50	\$550.00	\$1,925.00
03/14/2021	Lawrence Hosmer	Senior Staff Attorneys		58	10.75	\$425.00	\$4,568.75
03/14/2021	Richard Gluck	Senior Counsel		58	5.75	\$800.00	\$4,600.00
03/14/2021	Richard Gluck	Senior Counsel		58	0.50	\$800.00	\$400.00
03/14/2021	Richard Gluck	Senior Counsel		58	1.00	\$800.00	\$800.00
03/14/2021	Ryan Candee	Senior Staff Attorneys		58	3.75	\$425.00	\$1,593.75
03/14/2021	Ryan Dykhous	Associate		58	7.00	\$425.00	\$2,975.00
03/14/2021	Stephen Imundo	Senior Staff Attorneys		58	10.50	\$425.00	\$4,462.50
03/14/2021	Jeremy Robinson	Partner		58	13.00	\$900.00	\$11,700.00
03/15/2021	Addison F. Golladay	Staff Attorney		58	7.50	\$400.00	\$3,000.00
03/15/2021	Andrew Boruch	Senior Staff Attorneys		58	9.25	\$425.00	\$3,931.25
03/15/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/15/2021	Erick Ladson	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/15/2021	Helen Fikrey	Staff Attorney		58	7.00	\$400.00	\$2,800.00
03/15/2021	Jed Koslow	Staff Attorney		58	10.00	\$400.00	\$4,000.00
03/15/2021	Jose Echegaray	Case Managers		58	5.00	\$350.00	\$1,750.00
03/15/2021	Juan Lossada	Staff Attorney		58	8.00	\$400.00	\$3,200.00

03/15/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
03/15/2021	Lauren Cruz	Associate		58	4.00	\$550.00	\$2,200.00
03/15/2021	Lawrence Hosmer	Senior Staff Attorneys		58	8.75	\$425.00	\$3,718.75
03/15/2021	Richard Gluck	Senior Counsel		58	1.00	\$800.00	\$800.00
03/15/2021	Richard Gluck	Senior Counsel		58	6.00	\$800.00	\$4,800.00
03/15/2021	Richard Gluck	Senior Counsel		58	1.75	\$800.00	\$1,400.00
03/15/2021	Ryan Candee	Senior Staff Attorneys		58	2.50	\$425.00	\$1,062.50
03/15/2021	Ryan Dykhous	Associate		58	7.00	\$425.00	\$2,975.00
03/15/2021	Stephen Imundo	Senior Staff Attorneys		58	9.50	\$425.00	\$4,037.50
03/15/2021	Jeremy Robinson	Partner		58	14.00	\$900.00	\$12,600.00
03/16/2021	Addison F. Golladay	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/16/2021	Andrew Boruch	Senior Staff Attorneys		58	8.50	\$425.00	\$3,612.50
03/16/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/16/2021	Erick Ladson	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/16/2021	Helen Fikrey	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/16/2021	Jed Koslow	Staff Attorney		58	9.25	\$400.00	\$3,700.00
03/16/2021	Jose Echegaray	Case Managers		58	6.00	\$350.00	\$2,100.00
03/16/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
03/16/2021	Lauren Cruz	Associate		58	1.25	\$550.00	\$687.50
03/16/2021	Lawrence Hosmer	Senior Staff Attorneys		58	8.25	\$425.00	\$3,506.25
03/16/2021	Richard Gluck	Senior Counsel		58	0.50	\$800.00	\$400.00
03/16/2021	Richard Gluck	Senior Counsel		58	4.00	\$800.00	\$3,200.00
03/16/2021	Richard Gluck	Senior Counsel		58	1.25	\$800.00	\$1,000.00
03/16/2021	Richard Gluck	Senior Counsel		58	1.00	\$800.00	\$800.00
03/16/2021	Richard Gluck	Senior Counsel		58	2.50	\$800.00	\$2,000.00
03/16/2021	Richard Gluck	Senior Counsel		58	1.00	\$800.00	\$800.00
03/16/2021	Ryan Candee	Senior Staff Attorneys		58	8.00	\$425.00	\$3,400.00

03/16/2021	Ryan Dykhous	Associate		58	0.50	\$425.00	\$212.50
03/16/2021	Ryan Dykhous	Associate		58	1.50	\$425.00	\$637.50
03/16/2021	Ryan Dykhous	Associate		58	1.00	\$425.00	\$425.00
03/16/2021	Ryan Dykhous	Associate		58	7.00	\$425.00	\$2,975.00
03/16/2021	Ryan Dykhous	Associate		58	1.00	\$425.00	\$425.00
03/16/2021	Stephen Imundo	Senior Staff Attorneys		58	7.75	\$425.00	\$3,293.75
03/16/2021	Jeremy Robinson	Partner		58	12.00	\$900.00	\$10,800.00
03/16/2021	Salvatore Graziano	Partner		58	0.50	\$1,150.00	\$575.00
03/17/2021	Addison F. Golladay	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/17/2021	Andrew Boruch	Senior Staff Attorneys		58	8.75	\$425.00	\$3,718.75
03/17/2021	Brian Chau	Senior Staff Attorneys		58	10.00	\$425.00	\$4,250.00
03/17/2021	Erick Ladson	Staff Attorney		58	12.25	\$400.00	\$4,900.00
03/17/2021	Helen Fikrey	Staff Attorney		58	13.00	\$400.00	\$5,200.00
03/17/2021	Jed Koslow	Staff Attorney		58	8.75	\$400.00	\$3,500.00
03/17/2021	Jose Echegaray	Case Managers		58	13.00	\$350.00	\$4,550.00
03/17/2021	Juan Lossada	Staff Attorney		58	11.75	\$400.00	\$4,700.00
03/17/2021	Lauren Cormier	Staff Attorney		58	9.75	\$375.00	\$3,656.25
03/17/2021	Lauren Cruz	Associate		58	4.75	\$550.00	\$2,612.50
03/17/2021	Lawrence Hosmer	Senior Staff Attorneys		58	11.00	\$425.00	\$4,675.00
03/17/2021	Michelle Leung	Case Managers		58	8.50	\$350.00	\$2,975.00
03/17/2021	Preya Rodriguez	Paralegal		58	13.00	\$325.00	\$4,225.00
03/17/2021	Richard Gluck	Senior Counsel		58	3.75	\$800.00	\$3,000.00
03/17/2021	Richard Gluck	Senior Counsel		58	0.50	\$800.00	\$400.00
03/17/2021	Richard Gluck	Senior Counsel		58	1.50	\$800.00	\$1,200.00
03/17/2021	Richard Gluck	Senior Counsel		58	1.00	\$800.00	\$800.00
03/17/2021	Richard Gluck	Senior Counsel		58	1.25	\$800.00	\$1,000.00
03/17/2021	Richard Gluck	Senior Counsel		58	1.00	\$800.00	\$800.00

03/17/2021	Richard Gluck	Senior Counsel		58	0.50	\$800.00	\$400.00
03/17/2021	Ryan Candee	Senior Staff Attorneys		58	11.00	\$425.00	\$4,675.00
03/17/2021	Ryan Dykhous	Associate		58	12.75	\$425.00	\$5,418.75
03/17/2021	Ryan Dykhous	Associate		58	1.50	\$425.00	\$637.50
03/17/2021	Stephen Imundo	Senior Staff Attorneys		58	14.50	\$425.00	\$6,162.50
03/17/2021	Jeremy Robinson	Partner		58	14.00	\$900.00	\$12,600.00
03/17/2021	Salvatore Graziano	Partner		58	1.50	\$1,150.00	\$1,725.00
03/17/2021	Rebecca Boon	Partner		58	2.00	\$875.00	\$1,750.00
03/18/2021	Addison F. Golladay	Staff Attorney		58	12.50	\$400.00	\$5,000.00
03/18/2021	Andrew Boruch	Senior Staff Attorneys		58	12.75	\$425.00	\$5,418.75
03/18/2021	Brian Chau	Senior Staff Attorneys		58	15.00	\$425.00	\$6,375.00
03/18/2021	Erick Ladson	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/18/2021	Helen Fikrey	Staff Attorney		58	3.00	\$400.00	\$1,200.00
03/18/2021	Helen Fikrey	Staff Attorney		58	5.50	\$400.00	\$2,200.00
03/18/2021	Jed Koslow	Staff Attorney		58	12.00	\$400.00	\$4,800.00
03/18/2021	Jose Echegaray	Case Managers		58	19.00	\$350.00	\$6,650.00
03/18/2021	Juan Lossada	Staff Attorney		58	12.00	\$400.00	\$4,800.00
03/18/2021	Lauren Cormier	Staff Attorney		58	14.25	\$375.00	\$5,343.75
03/18/2021	Lauren Cruz	Associate		58	1.50	\$550.00	\$825.00
03/18/2021	Lawrence Hosmer	Senior Staff Attorneys		58	8.75	\$425.00	\$3,718.75
03/18/2021	Preya Rodriguez	Paralegal		58	15.00	\$325.00	\$4,875.00
03/18/2021	Richard Gluck	Senior Counsel		58	2.50	\$800.00	\$2,000.00
03/18/2021	Richard Gluck	Senior Counsel		58	3.25	\$800.00	\$2,600.00
03/18/2021	Richard Gluck	Senior Counsel		58	0.50	\$800.00	\$400.00
03/18/2021	Richard Gluck	Senior Counsel		58	2.75	\$800.00	\$2,200.00
03/18/2021	Ryan Candee	Senior Staff Attorneys		58	11.25	\$425.00	\$4,781.25
03/18/2021	Ryan Dykhous	Associate		58	18.00	\$425.00	\$7,650.00

03/18/2021	Stephen Imundo	Senior Staff Attorneys		58	16.25	\$425.00	\$6,906.25
03/18/2021	Jeremy Robinson	Partner		58	15.00	\$900.00	\$13,500.00
03/19/2021	Addison F. Golladay	Staff Attorney		58	4.00	\$400.00	\$1,600.00
03/19/2021	Andrew Boruch	Senior Staff Attorneys		58	8.25	\$425.00	\$3,506.25
03/19/2021	Brian Chau	Senior Staff Attorneys		58	14.00	\$425.00	\$5,950.00
03/19/2021	Erick Ladson	Staff Attorney		58	3.75	\$400.00	\$1,500.00
03/19/2021	Helen Fikrey	Staff Attorney		58	3.50	\$400.00	\$1,400.00
03/19/2021	Jose Echegaray	Case Managers		58	18.50	\$350.00	\$6,475.00
03/19/2021	Michelle Leung	Case Managers		58	4.25	\$350.00	\$1,487.50
03/19/2021	Preya Rodriguez	Paralegal		58	12.00	\$325.00	\$3,900.00
03/19/2021	Richard Gluck	Senior Counsel		58	1.00	\$800.00	\$800.00
03/19/2021	Ryan Dykhous	Associate		58	18.00	\$425.00	\$7,650.00
03/19/2021	Stephen Imundo	Senior Staff Attorneys		58	4.00	\$425.00	\$1,700.00
03/19/2021	Rebecca Boon	Partner		58	1.00	\$875.00	\$875.00
03/20/2021	Ryan Dykhous	Associate		58	2.00	\$425.00	\$850.00
03/22/2021	Andrew Boruch	Senior Staff Attorneys		58	8.50	\$425.00	\$3,612.50
03/22/2021	Brian Chau	Senior Staff Attorneys		58	8.00	\$425.00	\$3,400.00
03/22/2021	Erick Ladson	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/22/2021	Helen Fikrey	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/22/2021	Jed Koslow	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/22/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
03/22/2021	Lawrence Hosmer	Senior Staff Attorneys		58	8.75	\$425.00	\$3,718.75
03/22/2021	Ryan Dykhous	Associate		58	1.25	\$425.00	\$531.25

03/22/2021	Stephen Imundo	Senior Staff Attorneys		58	8.25	\$425.00	\$3,506.25
03/23/2021	Andrew Boruch	Senior Staff Attorneys		58	5.00	\$425.00	\$2,125.00
03/23/2021	Brian Chau	Senior Staff Attorneys		58	3.00	\$425.00	\$1,275.00
03/23/2021	Erick Ladson	Staff Attorney		58	8.50	\$400.00	\$3,400.00
03/23/2021	Helen Fikrey	Staff Attorney		58	8.00	\$400.00	\$3,200.00
03/23/2021	Jose Echegaray	Case Managers		58	0.50	\$350.00	\$175.00
03/23/2021	Lauren Cormier	Staff Attorney		58	8.00	\$375.00	\$3,000.00
03/23/2021	Lawrence Hosmer	Senior Staff Attorneys		58	8.25	\$425.00	\$3,506.25
03/23/2021	Preya Rodriguez	Paralegal		58	5.00	\$325.00	\$1,625.00
03/24/2021	Erick Ladson	Staff Attorney		58	5.50	\$400.00	\$2,200.00
03/24/2021	Helen Fikrey	Staff Attorney		58	7.25	\$400.00	\$2,900.00
03/24/2021	Jose Echegaray	Case Managers		58	2.75	\$350.00	\$962.50
03/24/2021	Salvatore Graziano	Partner		58	0.50	\$1,150.00	\$575.00
03/25/2021	Richard Gluck	Senior Counsel		58	1.25	\$800.00	\$1,000.00
03/25/2021	Ryan Dykhous	Associate		58	2.00	\$425.00	\$850.00
03/26/2021	Richard Gluck	Senior Counsel		58	1.00	\$800.00	\$800.00
03/26/2021	Jeremy Robinson	Partner		58	5.00	\$900.00	\$4,500.00
03/29/2021	Jeremy Robinson	Partner		58	2.50	\$900.00	\$2,250.00
03/30/2021	Jose Echegaray	Case Managers		58	3.50	\$350.00	\$1,225.00
03/30/2021	Richard Gluck	Senior Counsel		58	0.50	\$800.00	\$400.00
03/30/2021	Ryan Dykhous	Associate		58	3.50	\$425.00	\$1,487.50
03/30/2021	Jeremy Robinson	Partner		58	2.50	\$900.00	\$2,250.00
04/01/2021	Richard Gluck	Senior Counsel		58	1.25	\$800.00	\$1,000.00
04/12/2021	Jeremy Robinson	Partner		58	3.00	\$900.00	\$2,700.00
04/13/2021	Jeremy Robinson	Partner		58	3.00	\$900.00	\$2,700.00
04/14/2021	Richard Gluck	Senior Counsel		58	0.25	\$800.00	\$200.00

04/14/2021	Ryan Dykhous	Associate		58	1.75	\$425.00	\$743.75
04/14/2021	Jeremy Robinson	Partner		58	2.00	\$900.00	\$1,800.00
04/15/2021	Jeremy Robinson	Partner		58	1.00	\$900.00	\$900.00
04/16/2021	Jeremy Robinson	Partner		58	8.00	\$900.00	\$7,200.00
04/18/2021	Ryan Dykhous	Associate		58	2.25	\$425.00	\$956.25
04/19/2021	Jose Echegaray	Case Managers		58	5.25	\$350.00	\$1,837.50
04/19/2021	Ryan Dykhous	Associate		58	1.50	\$425.00	\$637.50
04/19/2021	Jeremy Robinson	Partner		58	8.00	\$900.00	\$7,200.00
04/20/2021	Ryan Dykhous	Associate		58	1.00	\$425.00	\$425.00
04/20/2021	Ryan Dykhous	Associate		58	0.50	\$425.00	\$212.50
04/20/2021	Jeremy Robinson	Partner		58	4.50	\$900.00	\$4,050.00
04/21/2021	Ryan Dykhous	Associate		58	2.25	\$425.00	\$956.25
04/21/2021	Jeremy Robinson	Partner		58	4.00	\$900.00	\$3,600.00
04/21/2021	Salvatore Graziano	Partner		58	1.25	\$1,150.00	\$1,437.50
04/22/2021	Jeremy Robinson	Partner		58	3.50	\$900.00	\$3,150.00
04/22/2021	Salvatore Graziano	Partner		58	2.00	\$1,150.00	\$2,300.00
04/23/2021	Ryan Dykhous	Associate		58	0.75	\$425.00	\$318.75
04/23/2021	Jeremy Robinson	Partner		58	7.00	\$900.00	\$6,300.00
04/25/2021	Jose Echegaray	Case Managers		58	2.75	\$350.00	\$962.50
04/26/2021	Jeremy Robinson	Partner		58	2.00	\$900.00	\$1,800.00
04/27/2021	Jose Echegaray	Case Managers		58	7.75	\$350.00	\$2,712.50
04/27/2021	Jeremy Robinson	Partner		58	6.00	\$900.00	\$5,400.00
04/28/2021	Jose Echegaray	Case Managers		58	7.25	\$350.00	\$2,537.50
04/28/2021	Jeremy Robinson	Partner		58	4.00	\$900.00	\$3,600.00
				TOTALS FOR PROJECT #58:		2,827.25	\$1,303,300.00

Project #59: Draft Jury Instructions: As set forth below, Lead Counsel spent 12.25 hours with a lodestar of \$9,800.00 researching and drafting proposed jury instructions in preparation for trial.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
02/02/2021	Richard Gluck	Senior Counsel		59	0.25	\$800.00	\$200.00
03/23/2021	Richard Gluck	Senior Counsel		59	2.25	\$800.00	\$1,800.00
03/29/2021	Richard Gluck	Senior Counsel		59	1.00	\$800.00	\$800.00
04/02/2021	Richard Gluck	Senior Counsel		59	0.50	\$800.00	\$400.00
04/07/2021	Richard Gluck	Senior Counsel		59	0.50	\$800.00	\$400.00
04/09/2021	Richard Gluck	Senior Counsel		59	0.75	\$800.00	\$600.00
04/12/2021	Richard Gluck	Senior Counsel		59	1.25	\$800.00	\$1,000.00
04/13/2021	Richard Gluck	Senior Counsel		59	1.25	\$800.00	\$1,000.00

04/14/2021	Richard Gluck	Senior Counsel		59	1.25	\$800.00	\$1,000.00
04/14/2021	Richard Gluck	Senior Counsel		59	1.00	\$800.00	\$800.00
04/15/2021	Richard Gluck	Senior Counsel		59	1.00	\$800.00	\$800.00
04/22/2021	Richard Gluck	Senior Counsel		59	1.25	\$800.00	\$1,000.00
			TOTALS FOR PROJECT #59:		12.25		\$9,800.00

Project #60: Special Verdict Form: As set forth below, Lead Counsel spent 5.75 hours with a lodestar of \$4,600.00 researching and drafting a proposed Special Verdict Form in preparation for trial.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
03/29/2021	Richard Gluck	Senior Counsel		60	1.00	\$800.00	\$800.00
04/07/2021	Richard Gluck	Senior Counsel		60	0.50	\$800.00	\$400.00
04/12/2021	Richard Gluck	Senior Counsel		60	1.75	\$800.00	\$1,400.00
04/15/2021	Richard Gluck	Senior Counsel		60	1.25	\$800.00	\$1,000.00
04/22/2021	Richard Gluck	Senior Counsel		60	1.25	\$800.00	\$1,000.00
			TOTALS FOR PROJECT #60:		5.75		\$4,600.00

Project #61: Trial Exhibit List: Lead Counsel spent a total of 1,354.75 hours with a lodestar of \$561,981.25 preparing a master list of potential trial exhibits. This work, the details of which are broken down chronologically below, included an extensive review of key documents identified in the discovery process and used in depositions, culling selected exhibits, and creating a master document with key information about each potential exhibit.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
03/22/2021	Ryan Dykhous	Associate		61	1.25	\$425.00	\$531.25
03/24/2021	Preya Rodriguez	Paralegal		61	0.25	\$325.00	\$81.25
03/24/2021	Ryan Candee	Senior Staff Attorneys		61	8.50	\$425.00	\$3,612.50
03/24/2021	Stephen Imundo	Senior Staff Attorneys		61	10.25	\$425.00	\$4,356.25
03/25/2021	Helen Fikrey	Staff Attorney		61	8.75	\$400.00	\$3,500.00
03/25/2021	Jed Koslow	Staff Attorney		61	4.00	\$400.00	\$1,600.00
03/25/2021	Lawrence Hosmer	Senior Staff Attorneys		61	7.50	\$425.00	\$3,187.50
03/25/2021	Richard Gluck	Senior Counsel		61	3.25	\$800.00	\$2,600.00
03/25/2021	Ryan Candee	Senior Staff Attorneys		61	8.25	\$425.00	\$3,506.25
03/25/2021	Stephen Imundo	Senior Staff Attorneys		61	9.75	\$425.00	\$4,143.75
03/26/2021	Helen Fikrey	Staff Attorney		61	8.00	\$400.00	\$3,200.00
03/26/2021	Jed Koslow	Staff Attorney		61	4.00	\$400.00	\$1,600.00
03/26/2021	Ryan Candee	Senior Staff Attorneys		61	9.50	\$425.00	\$4,037.50
03/26/2021	Stephen Imundo	Senior Staff Attorneys		61	8.50	\$425.00	\$3,612.50
03/29/2021	Erick Ladson	Staff Attorney		61	8.50	\$400.00	\$3,400.00

03/29/2021	Helen Fikrey	Staff Attorney		61	8.00	\$400.00	\$3,200.00
03/29/2021	Jed Koslow	Staff Attorney		61	11.00	\$400.00	\$4,400.00
03/29/2021	Ryan Candee	Senior Staff Attorneys		61	9.00	\$425.00	\$3,825.00
03/30/2021	Erick Ladson	Staff Attorney		61	9.00	\$400.00	\$3,600.00
03/30/2021	Helen Fikrey	Staff Attorney		61	8.00	\$400.00	\$3,200.00
03/30/2021	Jed Koslow	Staff Attorney		61	11.75	\$400.00	\$4,700.00
03/30/2021	Lawrence Hosmer	Senior Staff Attorneys		61	8.25	\$425.00	\$3,506.25
03/30/2021	Richard Gluck	Senior Counsel		61	3.75	\$800.00	\$3,000.00
03/30/2021	Ryan Candee	Senior Staff Attorneys		61	8.00	\$425.00	\$3,400.00
03/30/2021	Stephen Imundo	Senior Staff Attorneys		61	9.00	\$425.00	\$3,825.00
03/31/2021	Erick Ladson	Staff Attorney		61	10.00	\$400.00	\$4,000.00
03/31/2021	Helen Fikrey	Staff Attorney		61	8.50	\$400.00	\$3,400.00
03/31/2021	Lawrence Hosmer	Senior Staff Attorneys		61	8.25	\$425.00	\$3,506.25
03/31/2021	Ryan Candee	Senior Staff Attorneys		61	8.75	\$425.00	\$3,718.75
03/31/2021	Stephen Imundo	Senior Staff Attorneys		61	9.50	\$425.00	\$4,037.50
04/01/2021	Erick Ladson	Staff Attorney		61	9.00	\$400.00	\$3,600.00
04/01/2021	Helen Fikrey	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/01/2021	Lawrence Hosmer	Senior Staff Attorneys		61	8.75	\$425.00	\$3,718.75
04/01/2021	Ryan Candee	Senior Staff Attorneys		61	8.25	\$425.00	\$3,506.25
04/01/2021	Ryan Dykhous	Associate		61	1.50	\$425.00	\$637.50
04/01/2021	Stephen Imundo	Senior Staff Attorneys		61	7.75	\$425.00	\$3,293.75
04/02/2021	Erick Ladson	Staff Attorney		61	3.50	\$400.00	\$1,400.00
04/02/2021	Helen Fikrey	Staff Attorney		61	7.50	\$400.00	\$3,000.00
04/02/2021	Lawrence Hosmer	Senior Staff Attorneys		61	8.00	\$425.00	\$3,400.00
04/02/2021	Ryan Candee	Senior Staff Attorneys		61	7.75	\$425.00	\$3,293.75
04/02/2021	Stephen Imundo	Senior Staff Attorneys		61	8.50	\$425.00	\$3,612.50
04/04/2021	Ryan Candee	Senior Staff Attorneys		61	2.50	\$425.00	\$1,062.50
04/04/2021	Stephen Imundo	Senior Staff Attorneys		61	2.50	\$425.00	\$1,062.50
04/05/2021	Erick Ladson	Staff Attorney		61	9.50	\$400.00	\$3,800.00
04/05/2021	Helen Fikrey	Staff Attorney		61	10.00	\$400.00	\$4,000.00
04/05/2021	Jed Koslow	Staff Attorney		61	9.75	\$400.00	\$3,900.00

04/05/2021	Lawrence Hosmer	Senior Staff Attorneys		61	8.75	\$425.00	\$3,718.75
04/05/2021	Ryan Candee	Senior Staff Attorneys		61	8.50	\$425.00	\$3,612.50
04/05/2021	Stephen Imundo	Senior Staff Attorneys		61	9.25	\$425.00	\$3,931.25
04/06/2021	Jed Koslow	Staff Attorney		61	9.25	\$400.00	\$3,700.00
04/06/2021	Ryan Candee	Senior Staff Attorneys		61	8.75	\$425.00	\$3,718.75
04/06/2021	Stephen Imundo	Senior Staff Attorneys		61	9.00	\$425.00	\$3,825.00
04/07/2021	Erick Ladson	Staff Attorney		61	9.50	\$400.00	\$3,800.00
04/07/2021	Helen Fikrey	Staff Attorney		61	9.50	\$400.00	\$3,800.00
04/07/2021	Jed Koslow	Staff Attorney		61	8.75	\$400.00	\$3,500.00
04/07/2021	Lawrence Hosmer	Senior Staff Attorneys		61	9.25	\$425.00	\$3,931.25
04/07/2021	Ryan Candee	Senior Staff Attorneys		61	8.50	\$425.00	\$3,612.50
04/07/2021	Stephen Imundo	Senior Staff Attorneys		61	8.75	\$425.00	\$3,718.75
04/08/2021	Erick Ladson	Staff Attorney		61	8.50	\$400.00	\$3,400.00
04/08/2021	Helen Fikrey	Staff Attorney		61	8.50	\$400.00	\$3,400.00
04/08/2021	Jed Koslow	Staff Attorney		61	6.75	\$400.00	\$2,700.00
04/08/2021	Lawrence Hosmer	Senior Staff Attorneys		61	9.25	\$425.00	\$3,931.25
04/08/2021	Ryan Candee	Senior Staff Attorneys		61	8.25	\$425.00	\$3,506.25
04/08/2021	Stephen Imundo	Senior Staff Attorneys		61	10.00	\$425.00	\$4,250.00
04/09/2021	Erick Ladson	Staff Attorney		61	4.50	\$400.00	\$1,800.00
04/09/2021	Helen Fikrey	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/09/2021	Jed Koslow	Staff Attorney		61	5.50	\$400.00	\$2,200.00
04/09/2021	Lawrence Hosmer	Senior Staff Attorneys		61	9.25	\$425.00	\$3,931.25
04/09/2021	Ryan Candee	Senior Staff Attorneys		61	8.00	\$425.00	\$3,400.00
04/09/2021	Stephen Imundo	Senior Staff Attorneys		61	8.00	\$425.00	\$3,400.00
04/10/2021	Helen Fikrey	Staff Attorney		61	4.00	\$400.00	\$1,600.00
04/10/2021	Stephen Imundo	Senior Staff Attorneys		61	3.00	\$425.00	\$1,275.00
04/11/2021	Colette Foster	Staff Attorney		61	5.00	\$400.00	\$2,000.00
04/11/2021	Ryan Candee	Senior Staff Attorneys		61	2.50	\$425.00	\$1,062.50

04/11/2021	Stephen Imundo	Senior Staff Attorneys		61	3.00	\$425.00	\$1,275.00
04/12/2021	Colette Foster	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/12/2021	Erick Ladson	Staff Attorney		61	10.00	\$400.00	\$4,000.00
04/12/2021	Helen Fikrey	Staff Attorney		61	10.00	\$400.00	\$4,000.00
04/12/2021	Jed Koslow	Staff Attorney		61	12.00	\$400.00	\$4,800.00
04/12/2021	Lawrence Hosmer	Senior Staff Attorneys		61	7.50	\$425.00	\$3,187.50
04/12/2021	Preya Rodriguez	Paralegal		61	1.00	\$325.00	\$325.00
04/12/2021	Ryan Candee	Senior Staff Attorneys		61	7.50	\$425.00	\$3,187.50
04/12/2021	Stephen Imundo	Senior Staff Attorneys		61	8.75	\$425.00	\$3,718.75
04/13/2021	Colette Foster	Staff Attorney		61	7.50	\$400.00	\$3,000.00
04/13/2021	Erick Ladson	Staff Attorney		61	10.00	\$400.00	\$4,000.00
04/13/2021	Jed Koslow	Staff Attorney		61	9.25	\$400.00	\$3,700.00
04/13/2021	Lawrence Hosmer	Senior Staff Attorneys		61	8.75	\$425.00	\$3,718.75
04/13/2021	Ryan Candee	Senior Staff Attorneys		61	9.50	\$425.00	\$4,037.50
04/13/2021	Stephen Imundo	Senior Staff Attorneys		61	8.50	\$425.00	\$3,612.50
04/14/2021	Colette Foster	Staff Attorney		61	3.00	\$400.00	\$1,200.00
04/14/2021	Colette Foster	Staff Attorney		61	4.50	\$400.00	\$1,800.00
04/14/2021	Erick Ladson	Staff Attorney		61	10.00	\$400.00	\$4,000.00
04/14/2021	Helen Fikrey	Staff Attorney		61	11.00	\$400.00	\$4,400.00
04/14/2021	Jed Koslow	Staff Attorney		61	11.00	\$400.00	\$4,400.00
04/14/2021	Lawrence Hosmer	Senior Staff Attorneys		61	7.50	\$425.00	\$3,187.50
04/14/2021	Ryan Candee	Senior Staff Attorneys		61	8.50	\$425.00	\$3,612.50
04/14/2021	Stephen Imundo	Senior Staff Attorneys		61	8.75	\$425.00	\$3,718.75
04/15/2021	Colette Foster	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/15/2021	Erick Ladson	Staff Attorney		61	9.00	\$400.00	\$3,600.00
04/15/2021	Helen Fikrey	Staff Attorney		61	10.00	\$400.00	\$4,000.00
04/15/2021	Jed Koslow	Staff Attorney		61	6.25	\$400.00	\$2,500.00
04/15/2021	Lawrence Hosmer	Senior Staff Attorneys		61	8.00	\$425.00	\$3,400.00
04/15/2021	Ryan Candee	Senior Staff Attorneys		61	8.00	\$425.00	\$3,400.00
04/15/2021	Stephen Imundo	Senior Staff Attorneys		61	10.00	\$425.00	\$4,250.00

04/16/2021	Stephen Imundo	Senior Staff Attorneys		61	6.00	\$425.00	\$2,550.00
04/17/2021	Stephen Imundo	Senior Staff Attorneys		61	3.50	\$425.00	\$1,487.50
04/18/2021	Stephen Imundo	Senior Staff Attorneys		61	2.50	\$425.00	\$1,062.50
04/19/2021	Erick Ladson	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/19/2021	Helen Fikrey	Staff Attorney		61	6.25	\$400.00	\$2,500.00
04/19/2021	Jed Koslow	Staff Attorney		61	10.25	\$400.00	\$4,100.00
04/19/2021	Lawrence Hosmer	Senior Staff Attorneys		61	3.25	\$425.00	\$1,381.25
04/19/2021	Ryan Candee	Senior Staff Attorneys		61	8.00	\$425.00	\$3,400.00
04/19/2021	Stephen Imundo	Senior Staff Attorneys		61	8.25	\$425.00	\$3,506.25
04/20/2021	Erick Ladson	Staff Attorney		61	9.00	\$400.00	\$3,600.00
04/20/2021	Helen Fikrey	Staff Attorney		61	9.00	\$400.00	\$3,600.00
04/20/2021	Jed Koslow	Staff Attorney		61	8.50	\$400.00	\$3,400.00
04/20/2021	Lawrence Hosmer	Senior Staff Attorneys		61	10.00	\$425.00	\$4,250.00
04/20/2021	Ryan Candee	Senior Staff Attorneys		61	9.00	\$425.00	\$3,825.00
04/20/2021	Stephen Imundo	Senior Staff Attorneys		61	9.00	\$425.00	\$3,825.00
04/21/2021	Colette Foster	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/21/2021	Erick Ladson	Staff Attorney		61	9.00	\$400.00	\$3,600.00
04/21/2021	Helen Fikrey	Staff Attorney		61	9.00	\$400.00	\$3,600.00
04/21/2021	Jed Koslow	Staff Attorney		61	10.50	\$400.00	\$4,200.00
04/21/2021	Lawrence Hosmer	Senior Staff Attorneys		61	7.00	\$425.00	\$2,975.00
04/21/2021	Ryan Candee	Senior Staff Attorneys		61	8.50	\$425.00	\$3,612.50
04/21/2021	Stephen Imundo	Senior Staff Attorneys		61	8.75	\$425.00	\$3,718.75
04/22/2021	Colette Foster	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/22/2021	Erick Ladson	Staff Attorney		61	8.50	\$400.00	\$3,400.00
04/22/2021	Helen Fikrey	Staff Attorney		61	7.75	\$400.00	\$3,100.00
04/22/2021	Jed Koslow	Staff Attorney		61	4.75	\$400.00	\$1,900.00
04/22/2021	Lawrence Hosmer	Senior Staff Attorneys		61	10.00	\$425.00	\$4,250.00
04/22/2021	Ryan Candee	Senior Staff Attorneys		61	8.00	\$425.00	\$3,400.00

04/22/2021	Stephen Imundo	Senior Staff Attorneys		61	7.50	\$425.00	\$3,187.50
04/23/2021	Colette Foster	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/23/2021	Erick Ladson	Staff Attorney		61	5.50	\$400.00	\$2,200.00
04/23/2021	Helen Fikrey	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/23/2021	Jed Koslow	Staff Attorney		61	1.75	\$400.00	\$700.00
04/23/2021	Lawrence Hosmer	Senior Staff Attorneys		61	10.25	\$425.00	\$4,356.25
04/23/2021	Ryan Candee	Senior Staff Attorneys		61	7.75	\$425.00	\$3,293.75
04/23/2021	Stephen Imundo	Senior Staff Attorneys		61	7.00	\$425.00	\$2,975.00
04/25/2021	Ryan Candee	Senior Staff Attorneys		61	2.25	\$425.00	\$956.25
04/26/2021	Colette Foster	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/26/2021	Erick Ladson	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/26/2021	Helen Fikrey	Staff Attorney		61	9.00	\$400.00	\$3,600.00
04/26/2021	Jed Koslow	Staff Attorney		61	10.50	\$400.00	\$4,200.00
04/26/2021	Lawrence Hosmer	Senior Staff Attorneys		61	9.00	\$425.00	\$3,825.00
04/26/2021	Ryan Candee	Senior Staff Attorneys		61	8.25	\$425.00	\$3,506.25
04/26/2021	Stephen Imundo	Senior Staff Attorneys		61	8.50	\$425.00	\$3,612.50
04/27/2021	Colette Foster	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/27/2021	Erick Ladson	Staff Attorney		61	9.00	\$400.00	\$3,600.00
04/27/2021	Helen Fikrey	Staff Attorney		61	6.50	\$400.00	\$2,600.00
04/27/2021	Jed Koslow	Staff Attorney		61	10.00	\$400.00	\$4,000.00
04/27/2021	Lawrence Hosmer	Senior Staff Attorneys		61	9.00	\$425.00	\$3,825.00
04/27/2021	Ryan Candee	Senior Staff Attorneys		61	8.50	\$425.00	\$3,612.50
04/27/2021	Stephen Imundo	Senior Staff Attorneys		61	9.50	\$425.00	\$4,037.50
04/27/2021	Salvatore Graziano	Partner		61	1.50	\$1,150.00	\$1,725.00
04/28/2021	Colette Foster	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/28/2021	Erick Ladson	Staff Attorney		61	9.00	\$400.00	\$3,600.00
04/28/2021	Helen Fikrey	Staff Attorney		61	8.50	\$400.00	\$3,400.00
04/28/2021	Jed Koslow	Staff Attorney		61	9.75	\$400.00	\$3,900.00
04/28/2021	Ryan Candee	Senior Staff Attorneys		61	7.50	\$425.00	\$3,187.50
04/28/2021	Stephen Imundo	Senior Staff Attorneys		61	5.00	\$425.00	\$2,125.00

04/29/2021	Colette Foster	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/29/2021	Erick Ladson	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/29/2021	Helen Fikrey	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/29/2021	Jed Koslow	Staff Attorney		61	6.00	\$400.00	\$2,400.00
04/29/2021	Jose Echegaray	Case Managers		61	3.75	\$350.00	\$1,312.50
04/29/2021	Lawrence Hosmer	Senior Staff Attorneys		61	9.25	\$425.00	\$3,931.25
04/29/2021	Ryan Candee	Senior Staff Attorneys		61	8.25	\$425.00	\$3,506.25
04/29/2021	Stephen Imundo	Senior Staff Attorneys		61	7.00	\$425.00	\$2,975.00
04/30/2021	Colette Foster	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/30/2021	Erick Ladson	Staff Attorney		61	6.00	\$400.00	\$2,400.00
04/30/2021	Helen Fikrey	Staff Attorney		61	8.00	\$400.00	\$3,200.00
04/30/2021	Jed Koslow	Staff Attorney		61	3.75	\$400.00	\$1,500.00
04/30/2021	Lawrence Hosmer	Senior Staff Attorneys		61	6.00	\$425.00	\$2,550.00
04/30/2021	Ryan Candee	Senior Staff Attorneys		61	7.25	\$425.00	\$3,081.25
04/30/2021	Stephen Imundo	Senior Staff Attorneys		61	5.00	\$425.00	\$2,125.00
			TOTALS FOR PROJECT #61:		1,354.75		\$561,981.25

Project #62: Other Trial Preparations: Lead Counsel spent a total of 123.25 hours with a lodestar of \$83,812.50 conducting other trial preparations in addition to the work on jury instructions, special verdict form and trial exhibit list previously discussed. This work, the details of which are broken down chronologically below, included strategy sessions, planning for potential motions in limine and Daubert motions, and reviewing and analyzing key evidence.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
01/17/2021	Salvatore Graziano	Partner		62	0.50	\$1,150.00	\$575.00
01/18/2021	Salvatore Graziano	Partner		62	0.50	\$1,150.00	\$575.00
01/19/2021	Addison F. Golladay	Staff Attorney		62	11.00	\$400.00	\$4,400.00
03/22/2021	Ryan Candee	Senior Staff Attorneys		62	8.00	\$425.00	\$3,400.00
03/23/2021	Richard Gluck	Senior Counsel		62	0.50	\$800.00	\$400.00
03/23/2021	Richard Gluck	Senior Counsel		62	0.50	\$800.00	\$400.00
03/23/2021	Ryan Candee	Senior Staff Attorneys		62	8.00	\$425.00	\$3,400.00
03/23/2021	Ryan Dykhous	Associate		62	1.50	\$425.00	\$637.50
03/23/2021	Stephen Imundo	Senior Staff Attorneys		62	8.75	\$425.00	\$3,718.75
03/23/2021	Jeremy Robinson	Partner		62	3.00	\$900.00	\$2,700.00

03/24/2021	Richard Gluck	Senior Counsel		62	0.25	\$800.00	\$200.00
03/24/2021	Ryan Dykhous	Associate		62	2.00	\$425.00	\$850.00
03/24/2021	Jeremy Robinson	Partner		62	3.50	\$900.00	\$3,150.00
03/25/2021	Jeremy Robinson	Partner		62	3.00	\$900.00	\$2,700.00
03/29/2021	Richard Gluck	Senior Counsel		62	1.25	\$800.00	\$1,000.00
04/01/2021	Jeremy Robinson	Partner		62	4.00	\$900.00	\$3,600.00
04/02/2021	Preya Rodriguez	Paralegal		62	1.00	\$325.00	\$325.00
04/02/2021	Richard Gluck	Senior Counsel		62	0.50	\$800.00	\$400.00
04/02/2021	Richard Gluck	Senior Counsel		62	0.25	\$800.00	\$200.00
04/02/2021	Ryan Dykhous	Associate		62	1.00	\$425.00	\$425.00
04/02/2021	Jeremy Robinson	Partner		62	5.00	\$900.00	\$4,500.00
04/07/2021	Richard Gluck	Senior Counsel		62	0.75	\$800.00	\$600.00
04/08/2021	Richard Gluck	Senior Counsel		62	3.50	\$800.00	\$2,800.00
04/08/2021	Richard Gluck	Senior Counsel		62	3.50	\$800.00	\$2,800.00
04/09/2021	Richard Gluck	Senior Counsel		62	1.25	\$800.00	\$1,000.00
04/09/2021	Richard Gluck	Senior Counsel		62	3.25	\$800.00	\$2,600.00
04/12/2021	Richard Gluck	Senior Counsel		62	1.00	\$800.00	\$800.00
04/12/2021	Richard Gluck	Senior Counsel		62	1.00	\$800.00	\$800.00
04/12/2021	Richard Gluck	Senior Counsel		62	0.75	\$800.00	\$600.00
04/12/2021	Ryan Dykhous	Associate		62	2.25	\$425.00	\$956.25
04/13/2021	Richard Gluck	Senior Counsel		62	1.50	\$800.00	\$1,200.00
04/13/2021	Richard Gluck	Senior Counsel		62	0.25	\$800.00	\$200.00
04/13/2021	Richard Gluck	Senior Counsel		62	3.00	\$800.00	\$2,400.00
04/13/2021	Ryan Dykhous	Associate		62	0.75	\$425.00	\$318.75
04/13/2021	Stephen Imundo	Senior Staff Attorneys		62	1.00	\$425.00	\$425.00
04/14/2021	Richard Gluck	Senior Counsel		62	1.00	\$800.00	\$800.00
04/14/2021	Richard Gluck	Senior Counsel		62	2.00	\$800.00	\$1,600.00
04/14/2021	Richard Gluck	Senior Counsel		62	1.50	\$800.00	\$1,200.00
04/14/2021	Richard Gluck	Senior Counsel		62	2.25	\$800.00	\$1,800.00
04/14/2021	Jeremy Robinson	Partner		62	2.00	\$900.00	\$1,800.00
04/14/2021	Salvatore Graziano	Partner		62	2.25	\$1,150.00	\$2,587.50

04/15/2021	Richard Gluck	Senior Counsel		62	3.50	\$800.00	\$2,800.00
04/20/2021	Richard Gluck	Senior Counsel		62	2.00	\$800.00	\$1,600.00
04/20/2021	Jeremy Robinson	Partner		62	4.50	\$900.00	\$4,050.00
04/21/2021	Richard Gluck	Senior Counsel		62	1.50	\$800.00	\$1,200.00
04/21/2021	Ryan Dykhous	Associate		62	1.75	\$425.00	\$743.75
04/21/2021	Jeremy Robinson	Partner		62	4.00	\$900.00	\$3,600.00
04/22/2021	Richard Gluck	Senior Counsel		62	0.25	\$800.00	\$200.00
04/22/2021	Jeremy Robinson	Partner		62	3.50	\$900.00	\$3,150.00
04/27/2021	Jose Echegaray	Case Managers		62	1.00	\$350.00	\$350.00
04/29/2021	Jose Echegaray	Case Managers		62	2.00	\$350.00	\$700.00
05/08/2021	Salvatore Graziano	Partner		62	0.50	\$1,150.00	\$575.00
			TOTALS FOR PROJECT #62:		123.25		\$83,812.50

Project #63: Defendants' Motion for Partial Abeyance of Merit-Related Proceedings: As set forth below, Lead Counsel spent eight hours with a lodestar of \$8,200.00 in connection with Defendants' April 22, 2021 motion for a limited abeyance of merit-related proceedings pending the conclusion of the second opt-out period, and preparing for and attending an April 23, 2021 hearing on that motion.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
04/22/2021	Richard Gluck	Senior Counsel		63	0.50	\$800.00	\$400.00
04/24/2021	Salvatore Graziano	Partner		63	0.75	\$1,150.00	\$862.50
04/26/2021	Salvatore Graziano	Partner		63	1.00	\$1,150.00	\$1,150.00
04/29/2021	Salvatore Graziano	Partner		63	2.75	\$1,150.00	\$3,162.50
04/29/2021	Rebecca Boon	Partner		63	3.00	\$875.00	\$2,625.00
			TOTALS FOR PROJECT #63:		8.00		\$8,200.00

Project #64: Second Settlement Conference (May 24, 2021): The Parties held a second settlement conference before Magistrate Judge Ryu on May 24, 2021. Lead Counsel spent a total of 125 hours with a lodestar of \$112,100.00 in connection with the second settlement conference. This work, the details of which are broken down chronologically below, included drafting a memo to the client and other client communications concerning Lead Counsel's recommendations for settlement and settlement authority, drafting a demand letter and a private submission for Judge Ryu's eyes only, and preparing for and participating in the settlement conference.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
04/21/2021	Salvatore Graziano	Partner		64	1.50	\$1,150.00	\$1,725.00
04/29/2021	Jeremy Robinson	Partner		64	8.00	\$900.00	\$7,200.00
04/29/2021	Salvatore Graziano	Partner		64	0.75	\$1,150.00	\$862.50
04/29/2021	Salvatore Graziano	Partner		64	2.50	\$1,150.00	\$2,875.00
04/30/2021	Richard Gluck	Senior Counsel		64	0.50	\$800.00	\$400.00
04/30/2021	Jeremy Robinson	Partner		64	4.00	\$900.00	\$3,600.00
05/03/2021	Salvatore Graziano	Partner		64	1.00	\$1,150.00	\$1,150.00

05/04/2021	Jeremy Robinson	Partner		64	4.00	\$900.00	\$3,600.00
05/04/2021	Salvatore Graziano	Partner		64	1.25	\$1,150.00	\$1,437.50
05/05/2021	Salvatore Graziano	Partner		64	1.00	\$1,150.00	\$1,150.00
05/06/2021	Richard Gluck	Senior Counsel		64	0.50	\$800.00	\$400.00
05/06/2021	Salvatore Graziano	Partner		64	1.00	\$1,150.00	\$1,150.00
05/07/2021	Richard Gluck	Senior Counsel		64	1.00	\$800.00	\$800.00
05/07/2021	Richard Gluck	Senior Counsel		64	1.75	\$800.00	\$1,400.00
05/07/2021	Richard Gluck	Senior Counsel		64	0.50	\$800.00	\$400.00
05/07/2021	Richard Gluck	Senior Counsel		64	1.75	\$800.00	\$1,400.00
05/07/2021	Jeremy Robinson	Partner		64	2.00	\$900.00	\$1,800.00
05/07/2021	Salvatore Graziano	Partner		64	1.00	\$1,150.00	\$1,150.00
05/08/2021	Ryan Dykhous	Associate		64	2.00	\$425.00	\$850.00
05/09/2021	Ryan Dykhous	Associate		64	2.00	\$425.00	\$850.00
05/09/2021	Jeremy Robinson	Partner		64	5.00	\$900.00	\$4,500.00
05/10/2021	Richard Gluck	Senior Counsel		64	0.50	\$800.00	\$400.00
05/10/2021	Richard Gluck	Senior Counsel		64	3.25	\$800.00	\$2,600.00
05/10/2021	Richard Gluck	Senior Counsel		64	1.25	\$800.00	\$1,000.00
05/10/2021	Ryan Dykhous	Associate		64	1.00	\$425.00	\$425.00
05/10/2021	Ryan Dykhous	Associate		64	3.25	\$425.00	\$1,381.25
05/10/2021	Jeremy Robinson	Partner		64	5.00	\$900.00	\$4,500.00
05/10/2021	Salvatore Graziano	Partner		64	1.75	\$1,150.00	\$2,012.50
05/10/2021	Salvatore Graziano	Partner		64	0.50	\$1,150.00	\$575.00
05/10/2021	Rebecca Boon	Partner		64	3.00	\$875.00	\$2,625.00
05/11/2021	Richard Gluck	Senior Counsel		64	0.25	\$800.00	\$200.00
05/11/2021	Ryan Dykhous	Associate		64	1.25	\$425.00	\$531.25
05/11/2021	Jeremy Robinson	Partner		64	4.50	\$900.00	\$4,050.00
05/11/2021	Salvatore Graziano	Partner		64	1.00	\$1,150.00	\$1,150.00
05/12/2021	Richard Gluck	Senior Counsel		64	0.50	\$800.00	\$400.00
05/12/2021	Richard Gluck	Senior Counsel		64	1.00	\$800.00	\$800.00
05/12/2021	Jeremy Robinson	Partner		64	5.00	\$900.00	\$4,500.00
05/12/2021	Salvatore Graziano	Partner		64	1.00	\$1,150.00	\$1,150.00

05/13/2021	Richard Gluck	Senior Counsel		64	0.50	\$800.00	\$400.00
05/13/2021	Jeremy Robinson	Partner		64	1.00	\$900.00	\$900.00
05/14/2021	Salvatore Graziano	Partner		64	1.00	\$1,150.00	\$1,150.00
05/15/2021	Salvatore Graziano	Partner		64	0.50	\$1,150.00	\$575.00
05/16/2021	Jeremy Robinson	Partner		64	4.00	\$900.00	\$3,600.00
05/17/2021	Jeremy Robinson	Partner		64	4.50	\$900.00	\$4,050.00
05/17/2021	Salvatore Graziano	Partner		64	0.50	\$1,150.00	\$575.00
05/18/2021	Jeremy Robinson	Partner		64	5.00	\$900.00	\$4,500.00
05/19/2021	Jeremy Robinson	Partner		64	1.00	\$900.00	\$900.00
05/20/2021	Jeremy Robinson	Partner		64	3.00	\$900.00	\$2,700.00
05/21/2021	Jeremy Robinson	Partner		64	5.00	\$900.00	\$4,500.00
05/21/2021	Rebecca Boon	Partner		64	1.00	\$875.00	\$875.00
05/24/2021	Richard Gluck	Senior Counsel		64	0.50	\$800.00	\$400.00
05/24/2021	Jeremy Robinson	Partner		64	10.00	\$900.00	\$9,000.00
05/24/2021	Salvatore Graziano	Partner		64	6.50	\$1,150.00	\$7,475.00
05/24/2021	Rebecca Boon	Partner		64	4.00	\$875.00	\$3,500.00
				TOTALS FOR PROJECT #64:		125.00	

Project #65: Settlement Term Sheet (Executed May 26, 2021): Following their agreement in principle to settle reached at the second settlement conference with Judge Ryu, the Parties negotiated a Term Sheet and executed it on May 26, 2021. Lead Counsel spent a total of 8.75 hours with a lodestar of \$8,256.25 in drafting and negotiating the settlement term sheet.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
05/24/2021	David Duncan	Senior Counsel		65	0.75	\$775.00	\$581.25
05/25/2021	Jeremy Robinson	Partner		65	5.00	\$900.00	\$4,500.00
05/25/2021	Salvatore Graziano	Partner		65	1.00	\$1,150.00	\$1,150.00
05/26/2021	Salvatore Graziano	Partner		65	1.00	\$1,150.00	\$1,150.00
05/26/2021	Rebecca Boon	Partner		65	1.00	\$875.00	\$875.00
			TOTALS FOR PROJECT #65:			8.75	\$8,256.25

Project #66: Settlement Stipulation and Exhibits (Executed June 8, 2021): Lead Counsel spent a total of 50 hours with a lodestar of \$41,487.50 in connection with drafting and negotiating the definitive settlement agreement, the Stipulation and Agreement of Settlement, and its exhibits and related papers with Defendants. This work, the details of which are broken down chronologically below, included drafting and negotiating the Stipulation, the proposed Preliminary Approval Order and Judgment, the proposed Settlement Notice, Claim Form, and Summary Settlement Notice, and the Supplemental Agreement concerning Symantec's right to terminate the Settlement if additional requests for exclusion meet a certain threshold. No work after June 8, 2021 is included in Lead Counsel's application.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
05/26/2021	Jeremy Robinson	Partner		66	3.00	\$900.00	\$2,700.00
05/28/2021	Ryan Dykhous	Associate		66	2.25	\$425.00	\$956.25
05/28/2021	Jeremy Robinson	Partner		66	2.00	\$900.00	\$1,800.00
05/29/2021	Salvatore Graziano	Partner		66	0.50	\$1,150.00	\$575.00
06/01/2021	David Duncan	Senior Counsel		66	0.25	\$775.00	\$193.75

06/01/2021	Jeremy Robinson	Partner		66	4.00	\$900.00	\$3,600.00
06/01/2021	Salvatore Graziano	Partner		66	0.50	\$1,150.00	\$575.00
06/02/2021	Jeremy Robinson	Partner		66	3.00	\$900.00	\$2,700.00
06/03/2021	David Duncan	Senior Counsel		66	6.75	\$775.00	\$5,231.25
06/03/2021	Jeremy Robinson	Partner		66	3.00	\$900.00	\$2,700.00
06/04/2021	David Duncan	Senior Counsel		66	5.50	\$775.00	\$4,262.50
06/04/2021	Jeremy Robinson	Partner		66	3.00	\$900.00	\$2,700.00
06/04/2021	Rebecca Boon	Partner		66	1.00	\$875.00	\$875.00
06/05/2021	David Duncan	Senior Counsel		66	2.75	\$775.00	\$2,131.25
06/06/2021	David Duncan	Senior Counsel		66	1.75	\$775.00	\$1,356.25
06/07/2021	David Duncan	Senior Counsel		66	4.50	\$775.00	\$3,487.50
06/07/2021	Jeremy Robinson	Partner		66	1.00	\$900.00	\$900.00
06/07/2021	Salvatore Graziano	Partner		66	0.50	\$1,150.00	\$575.00
06/07/2021	Rebecca Boon	Partner		66	0.50	\$875.00	\$437.50
06/08/2021	David Duncan	Senior Counsel		66	1.75	\$775.00	\$1,356.25
06/08/2021	Jeremy Robinson	Partner		66	2.00	\$900.00	\$1,800.00
06/08/2021	Salvatore Graziano	Partner		66	0.50	\$1,150.00	\$575.00
			TOTALS FOR PROJECT #66:		50.00		\$41,487.50

Project #67: Strategy: As set forth below, Lead Counsel spent 166 hours with a lodestar of \$146,381.25 on high-level strategy discussions and analysis, not directly tied to one of the forementioned litigation projects.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
07/19/2018	David Stickney	Partner		67	0.50	\$975.00	\$487.50
08/14/2018	Max Berger	Partner		67	3.00	\$1,300.00	\$3,900.00
09/05/2018	Max Berger	Partner		67	4.00	\$1,300.00	\$5,200.00
09/07/2018	Max Berger	Partner		67	5.00	\$1,300.00	\$6,500.00

10/01/2018	Max Berger	Partner		67	2.00	\$1,300.00	\$2,600.00
10/08/2018	Max Berger	Partner		67	3.00	\$1,300.00	\$3,900.00
10/11/2018	Max Berger	Partner		67	4.25	\$1,300.00	\$5,525.00
10/26/2018	Max Berger	Partner		67	3.00	\$1,300.00	\$3,900.00
02/25/2019	Jeremy Robinson	Partner		67	6.00	\$900.00	\$5,400.00
05/08/2019	Max Berger	Partner		67	4.00	\$1,300.00	\$5,200.00
06/17/2019	Salvatore Graziano	Partner		67	1.00	\$1,150.00	\$1,150.00
07/15/2019	Max Berger	Partner		67	2.00	\$1,300.00	\$2,600.00
08/01/2019	Max Berger	Partner		67	3.00	\$1,300.00	\$3,900.00
08/09/2019	Rebecca Boon	Partner		67	0.50	\$875.00	\$437.50
08/23/2019	Jose Echegaray	Case Managers		67	3.50	\$350.00	\$1,225.00
08/29/2019	Max Berger	Partner		67	3.25	\$1,300.00	\$4,225.00
10/23/2019	Max Berger	Partner		67	3.50	\$1,300.00	\$4,550.00
11/07/2019	Rebecca Boon	Partner		67	0.75	\$875.00	\$656.25
11/07/2019	Salvatore Graziano	Partner		67	0.50	\$1,150.00	\$575.00
12/04/2019	Salvatore Graziano	Partner		67	0.50	\$1,150.00	\$575.00
12/10/2019	Max Berger	Partner		67	3.00	\$1,300.00	\$3,900.00
12/10/2019	Ryan Dykhous	Associate		67	0.75	\$425.00	\$318.75
01/20/2020	Max Berger	Partner		67	2.00	\$1,300.00	\$2,600.00
02/13/2020	Max Berger	Partner		67	6.00	\$1,300.00	\$7,800.00
03/19/2020	Ryan Dykhous	Associate		67	0.75	\$425.00	\$318.75
04/22/2020	Max Berger	Partner		67	2.50	\$1,300.00	\$3,250.00
05/08/2020	Rebecca Boon	Partner		67	3.50	\$875.00	\$3,062.50
05/08/2020	Salvatore Graziano	Partner		67	0.75	\$1,150.00	\$862.50
05/09/2020	Salvatore Graziano	Partner		67	0.50	\$1,150.00	\$575.00
05/26/2020	Max Berger	Partner		67	3.00	\$1,300.00	\$3,900.00
06/22/2020	Ryan Dykhous	Associate		67	1.75	\$425.00	\$743.75
06/23/2020	Max Berger	Partner		67	3.00	\$1,300.00	\$3,900.00
06/24/2020	Ryan Dykhous	Associate		67	2.25	\$425.00	\$956.25
06/25/2020	Ryan Dykhous	Associate		67	2.50	\$425.00	\$1,062.50
06/26/2020	Ryan Dykhous	Associate		67	5.00	\$425.00	\$2,125.00
06/29/2020	Ryan Dykhous	Associate		67	1.00	\$425.00	\$425.00
06/30/2020	Ryan Dykhous	Associate		67	1.50	\$425.00	\$637.50
06/30/2020	Stephen Imundo	Senior Staff Attorneys		67	9.50	\$425.00	\$4,037.50
07/03/2020	Ryan Dykhous	Associate		67	1.75	\$425.00	\$743.75
07/05/2020	Ryan Dykhous	Associate		67	0.50	\$425.00	\$212.50
07/06/2020	Jeremy Robinson	Partner		67	2.00	\$900.00	\$1,800.00
07/06/2020	Ryan Dykhous	Associate		67	1.25	\$425.00	\$531.25

07/14/2020	Jeremy Robinson	Partner		67	1.50	\$900.00	\$1,350.00
07/24/2020	Rebecca Boon	Partner		67	1.00	\$875.00	\$875.00
07/28/2020	Jeremy Robinson	Partner		67	1.00	\$900.00	\$900.00
08/10/2020	Jeremy Robinson	Partner		67	5.50	\$900.00	\$4,950.00
09/05/2020	Addison F. Golladay	Staff Attorney		67	6.00	\$400.00	\$2,400.00
09/05/2020	Helen Fikrey	Staff Attorney		67	4.25	\$400.00	\$1,700.00
09/05/2020	Ryan Dykhous	Associate		67	4.50	\$425.00	\$1,912.50
09/07/2020	Ryan Dykhous	Associate		67	1.25	\$425.00	\$531.25
09/14/2020	Michelle Leung	Case Managers		67	0.75	\$350.00	\$262.50
09/14/2020	Preya Rodriguez	Paralegal		67	0.75	\$325.00	\$243.75
09/15/2020	Rebecca Boon	Partner		67	2.00	\$875.00	\$1,750.00
09/25/2020	Salvatore Graziano	Partner		67	0.75	\$1,150.00	\$862.50
09/27/2020	Salvatore Graziano	Partner		67	0.50	\$1,150.00	\$575.00
10/05/2020	Richard Gluck	Senior Counsel		67	2.25	\$800.00	\$1,800.00
10/07/2020	Richard Gluck	Senior Counsel		67	2.75	\$800.00	\$2,200.00
10/08/2020	Richard Gluck	Senior Counsel		67	1.00	\$800.00	\$800.00
10/12/2020	Jeremy Robinson	Partner		67	2.50	\$900.00	\$2,250.00
10/14/2020	Richard Gluck	Senior Counsel		67	2.50	\$800.00	\$2,000.00
10/20/2020	Richard Gluck	Senior Counsel		67	0.50	\$800.00	\$400.00
10/20/2020	Richard Gluck	Senior Counsel		67	1.25	\$800.00	\$1,000.00
10/21/2020	Richard Gluck	Senior Counsel		67	2.75	\$800.00	\$2,200.00
10/26/2020	Jeremy Robinson	Partner		67	4.50	\$900.00	\$4,050.00
10/26/2020	Richard Gluck	Senior Counsel		67	1.75	\$800.00	\$1,400.00
10/28/2020	Ryan Dykhous	Associate		67	0.75	\$425.00	\$318.75
10/28/2020	Ryan Dykhous	Associate		67	0.75	\$425.00	\$318.75
10/30/2020	Richard Gluck	Senior Counsel		67	0.50	\$800.00	\$400.00
12/10/2020	Richard Gluck	Senior Counsel		67	0.25	\$800.00	\$200.00

12/31/2020	Richard Gluck	Senior Counsel		67	0.25	\$800.00	\$200.00
01/04/2021	Ryan Dykhous	Associate		67	0.25	\$425.00	\$106.25
01/25/2021	Richard Gluck	Senior Counsel		67	0.75	\$800.00	\$600.00
03/17/2021	Richard Gluck	Senior Counsel		67	0.75	\$800.00	\$600.00
05/24/2021	Ryan Dykhous	Associate		67	2.25	\$425.00	\$956.25
			TOTALS FOR PROJECT #67:		166.00		\$146,381.25

Project #68: Client Communications: As set forth below, Lead Counsel spent 10.25 hours with a lodestar of \$9,068.75 providing Lead Plaintiff SEB with periodic updates on the status of case not directly tied to one of the forementioned litigation projects.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
09/30/2018	David Stickney	Partner		68	0.25	\$975.00	\$243.75
10/01/2018	David Stickney	Partner		68	0.50	\$975.00	\$487.50
11/16/2018	David Stickney	Partner		68	0.25	\$975.00	\$243.75
11/19/2018	David Stickney	Partner		68	0.25	\$975.00	\$243.75
11/26/2018	David Stickney	Partner		68	0.50	\$975.00	\$487.50
01/25/2019	Lucas Gilmore	Senior Counsel		68	0.50	\$775.00	\$387.50
10/20/2019	Jeremy Robinson	Partner		68	1.00	\$900.00	\$900.00
10/25/2019	Rebecca Boon	Partner		68	2.00	\$875.00	\$1,750.00
02/13/2020	Rebecca Boon	Partner		68	3.50	\$875.00	\$3,062.50
06/10/2020	Rebecca Boon	Partner		68	0.50	\$875.00	\$437.50
07/27/2020	David Duncan	Senior Counsel		68	0.50	\$775.00	\$387.50
07/30/2020	Rebecca Boon	Partner		68	0.50	\$875.00	\$437.50
			TOTALS FOR PROJECT #68:		10.25		\$9,068.75

Project #69: Preparation of Depositions Kits: Prior to each of the depositions Lead Counsel's Staff Attorneys conducted extensive reviews of the documents produced by Defendants and third parties to identify documents that could potentially be of use in conducting each deposition. In total, Lead Counsel spent 8,993.75 hours with a lodestar of \$3,577,975.00 on this work. This work, the details of which are broken down chronologically below, included reviewing, analyzing, culling, and organizing documents for potential use in deposition preparation.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
05/08/2020	Johanna Pitcairn	Litigation Support		69	0.50	\$400.00	\$200.00
08/28/2020	Ibrahim Hamed	Staff Attorney		69	4.50	\$400.00	\$1,800.00
08/31/2020	Ibrahim Hamed	Staff Attorney		69	10.00	\$400.00	\$4,000.00
08/31/2020	Brian Chau	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
08/31/2020	Stephen Imundo	Senior Staff Attorneys		69	7.00	\$425.00	\$2,975.00

09/01/2020	Brian Chau	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
09/01/2020	Ibrahim Hamed	Staff Attorney		69	8.50	\$400.00	\$3,400.00
09/02/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/02/2020	Erick Ladson	Staff Attorney		69	8.50	\$400.00	\$3,400.00
09/02/2020	Ibrahim Hamed	Staff Attorney		69	9.50	\$400.00	\$3,800.00
09/03/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/03/2020	Erick Ladson	Staff Attorney		69	8.50	\$400.00	\$3,400.00
09/03/2020	Ibrahim Hamed	Staff Attorney		69	7.50	\$400.00	\$3,000.00
09/03/2020	Ingvar Olsson	Staff Attorney		69	7.75	\$400.00	\$3,100.00
09/04/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/04/2020	Erick Ladson	Staff Attorney		69	6.00	\$400.00	\$2,400.00
09/04/2020	Ibrahim Hamed	Staff Attorney		69	4.50	\$400.00	\$1,800.00
09/04/2020	Ingvar Olsson	Staff Attorney		69	6.75	\$400.00	\$2,700.00
09/08/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/08/2020	Erick Ladson	Staff Attorney		69	6.00	\$400.00	\$2,400.00
09/09/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/09/2020	Erick Ladson	Staff Attorney		69	4.50	\$400.00	\$1,800.00
09/10/2020	Brian Chau	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
09/10/2020	Stephen Imundo	Senior Staff Attorneys		69	6.25	\$425.00	\$2,656.25
09/10/2020	Erick Ladson	Staff Attorney		69	5.25	\$400.00	\$2,100.00
09/10/2020	Ingvar Olsson	Staff Attorney		69	9.00	\$400.00	\$3,600.00
09/12/2020	Stephen Imundo	Senior Staff Attorneys		69	6.00	\$425.00	\$2,550.00
09/12/2020	Ingvar Olsson	Staff Attorney		69	2.25	\$400.00	\$900.00
09/13/2020	Justin Ratliff	Staff Attorney		69	5.00	\$350.00	\$1,750.00
09/14/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/14/2020	Ibrahim Hamed	Staff Attorney		69	10.00	\$400.00	\$4,000.00
09/14/2020	Ingvar Olsson	Staff Attorney		69	8.50	\$400.00	\$3,400.00
09/14/2020	Justin Ratliff	Staff Attorney		69	8.00	\$350.00	\$2,800.00
09/15/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/15/2020	Ibrahim Hamed	Staff Attorney		69	10.00	\$400.00	\$4,000.00
09/15/2020	Ingvar Olsson	Staff Attorney		69	8.00	\$400.00	\$3,200.00
09/15/2020	Justin Ratliff	Staff Attorney		69	7.50	\$350.00	\$2,625.00
09/16/2020	Brian Chau	Senior Staff Attorneys		69	7.00	\$425.00	\$2,975.00
09/16/2020	Ibrahim Hamed	Staff Attorney		69	8.00	\$400.00	\$3,200.00
09/17/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/17/2020	Ibrahim Hamed	Staff Attorney		69	8.00	\$400.00	\$3,200.00
09/17/2020	Igor Faynshteyn	Staff Attorney		69	9.00	\$375.00	\$3,375.00
09/17/2020	Ingvar Olsson	Staff Attorney		69	8.00	\$400.00	\$3,200.00
09/17/2020	Justin Ratliff	Staff Attorney		69	5.00	\$350.00	\$1,750.00
09/18/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00

09/18/2020	Ibrahim Hamed	Staff Attorney		69	3.00	\$400.00	\$1,200.00
09/18/2020	Igor Faynshteyn	Staff Attorney		69	5.00	\$375.00	\$1,875.00
09/18/2020	Ingvar Olsson	Staff Attorney		69	5.00	\$400.00	\$2,000.00
09/18/2020	Justin Ratliff	Staff Attorney		69	1.75	\$350.00	\$612.50
09/19/2020	Ingvar Olsson	Staff Attorney		69	2.00	\$400.00	\$800.00
09/19/2020	Justin Ratliff	Staff Attorney		69	6.00	\$350.00	\$2,100.00
09/20/2020	Justin Ratliff	Staff Attorney		69	8.50	\$350.00	\$2,975.00
09/21/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/21/2020	Ibrahim Hamed	Staff Attorney		69	10.25	\$400.00	\$4,100.00
09/21/2020	Igor Faynshteyn	Staff Attorney		69	9.00	\$375.00	\$3,375.00
09/21/2020	Ingvar Olsson	Staff Attorney		69	8.50	\$400.00	\$3,400.00
09/21/2020	Justin Ratliff	Staff Attorney		69	7.00	\$350.00	\$2,450.00
09/22/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/22/2020	Ibrahim Hamed	Staff Attorney		69	10.25	\$400.00	\$4,100.00
09/22/2020	Igor Faynshteyn	Staff Attorney		69	11.50	\$375.00	\$4,312.50
09/23/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/23/2020	Erick Ladson	Staff Attorney		69	8.00	\$400.00	\$3,200.00
09/23/2020	Ibrahim Hamed	Staff Attorney		69	10.25	\$400.00	\$4,100.00
09/23/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
09/23/2020	Esinam Quarco	Staff Attorney		69	7.50	\$400.00	\$3,000.00
09/23/2020	Igor Faynshteyn	Staff Attorney		69	8.50	\$375.00	\$3,187.50
09/23/2020	Stephen Imundo	Senior Staff Attorneys		69	9.75	\$425.00	\$4,143.75
09/24/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/24/2020	Erick Ladson	Staff Attorney		69	8.00	\$400.00	\$3,200.00
09/24/2020	Ibrahim Hamed	Staff Attorney		69	9.25	\$400.00	\$3,700.00
09/24/2020	Addison F. Golladay	Staff Attorney		69	7.50	\$400.00	\$3,000.00
09/24/2020	Igor Faynshteyn	Staff Attorney		69	7.00	\$375.00	\$2,625.00
09/24/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
09/24/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
09/25/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/25/2020	Erick Ladson	Staff Attorney		69	6.00	\$400.00	\$2,400.00
09/25/2020	Stephen Imundo	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
09/25/2020	Esinam Quarco	Staff Attorney		69	2.00	\$400.00	\$800.00

09/25/2020	Igor Faynshteyn	Staff Attorney		69	4.00	\$375.00	\$1,500.00
09/25/2020	Justin Ratliff	Staff Attorney		69	10.00	\$350.00	\$3,500.00
09/25/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
09/25/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
09/26/2020	Justin Ratliff	Staff Attorney		69	4.25	\$350.00	\$1,487.50
09/27/2020	Esinam Quarco	Staff Attorney		69	4.00	\$400.00	\$1,600.00
09/27/2020	Justin Ratliff	Staff Attorney		69	12.50	\$350.00	\$4,375.00
09/28/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/28/2020	Erick Ladson	Staff Attorney		69	8.00	\$400.00	\$3,200.00
09/28/2020	Ibrahim Hamed	Staff Attorney		69	10.25	\$400.00	\$4,100.00
09/28/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
09/28/2020	Esinam Quarco	Staff Attorney		69	4.50	\$400.00	\$1,800.00
09/28/2020	Igor Faynshteyn	Staff Attorney		69	8.50	\$375.00	\$3,187.50
09/28/2020	Justin Ratliff	Staff Attorney		69	7.00	\$350.00	\$2,450.00
09/28/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
09/28/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
09/28/2020	Stephen Imundo	Senior Staff Attorneys		69	7.50	\$425.00	\$3,187.50
09/28/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
09/29/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/29/2020	Erick Ladson	Staff Attorney		69	4.50	\$400.00	\$1,800.00
09/29/2020	Erick Ladson	Staff Attorney		69	4.50	\$400.00	\$1,800.00
09/29/2020	Ibrahim Hamed	Staff Attorney		69	10.25	\$400.00	\$4,100.00
09/29/2020	Jed Koslow	Staff Attorney		69	2.25	\$400.00	\$900.00
09/29/2020	Addison F. Golladay	Staff Attorney		69	7.50	\$400.00	\$3,000.00
09/29/2020	Esinam Quarco	Staff Attorney		69	10.00	\$400.00	\$4,000.00
09/29/2020	Igor Faynshteyn	Staff Attorney		69	7.00	\$375.00	\$2,625.00
09/29/2020	Jed Koslow	Staff Attorney		69	5.25	\$400.00	\$2,100.00
09/29/2020	Justin Ratliff	Staff Attorney		69	3.00	\$350.00	\$1,050.00
09/29/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
09/29/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
09/29/2020	Stephen Imundo	Senior Staff Attorneys		69	2.25	\$425.00	\$956.25
09/29/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
09/30/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
09/30/2020	Addison F. Golladay	Staff Attorney		69	10.50	\$400.00	\$4,200.00

09/30/2020	Erick Ladson	Staff Attorney		69	9.00	\$400.00	\$3,600.00
09/30/2020	Esinam Quarco	Staff Attorney		69	11.50	\$400.00	\$4,600.00
09/30/2020	Helen Fikrey	Staff Attorney		69	6.00	\$400.00	\$2,400.00
09/30/2020	Ibrahim Hamed	Staff Attorney		69	9.25	\$400.00	\$3,700.00
09/30/2020	Igor Faynshteyn	Staff Attorney		69	9.00	\$375.00	\$3,375.00
09/30/2020	Jed Koslow	Staff Attorney		69	11.75	\$400.00	\$4,700.00
09/30/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
09/30/2020	Monique Hardial	Staff Attorney		69	7.00	\$375.00	\$2,625.00
09/30/2020	Stephen Imundo	Senior Staff Attorneys		69	2.75	\$425.00	\$1,168.75
09/30/2020	Stephen Imundo	Senior Staff Attorneys		69	6.75	\$425.00	\$2,868.75
09/30/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/01/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
10/01/2020	Erick Ladson	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/01/2020	Esinam Quarco	Staff Attorney		69	7.50	\$400.00	\$3,000.00
10/01/2020	Helen Fikrey	Staff Attorney		69	10.00	\$400.00	\$4,000.00
10/01/2020	Ibrahim Hamed	Staff Attorney		69	8.00	\$400.00	\$3,200.00
10/01/2020	Igor Faynshteyn	Staff Attorney		69	8.25	\$375.00	\$3,093.75
10/01/2020	Jed Koslow	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/01/2020	Justin Ratliff	Staff Attorney		69	4.75	\$350.00	\$1,662.50
10/01/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/01/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/01/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/02/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
10/02/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
10/02/2020	Erick Ladson	Staff Attorney		69	5.00	\$400.00	\$2,000.00
10/02/2020	Esinam Quarco	Staff Attorney		69	6.50	\$400.00	\$2,600.00
10/02/2020	Ibrahim Hamed	Staff Attorney		69	2.25	\$400.00	\$900.00
10/02/2020	Igor Faynshteyn	Staff Attorney		69	7.25	\$375.00	\$2,718.75
10/02/2020	Jed Koslow	Staff Attorney		69	6.25	\$400.00	\$2,500.00
10/02/2020	Justin Ratliff	Staff Attorney		69	5.00	\$350.00	\$1,750.00
10/02/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00

10/02/2020	Monique Hardial	Staff Attorney		69	7.00	\$375.00	\$2,625.00
10/02/2020	Stephen Imundo	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
10/02/2020	William Pham	Staff Attorney		69	4.00	\$375.00	\$1,500.00
10/03/2020	Justin Ratliff	Staff Attorney		69	7.25	\$350.00	\$2,537.50
10/04/2020	Addison F. Golladay	Staff Attorney		69	1.50	\$400.00	\$600.00
10/04/2020	Justin Ratliff	Staff Attorney		69	4.50	\$350.00	\$1,575.00
10/04/2020	Justin Ratliff	Staff Attorney		69	8.50	\$350.00	\$2,975.00
10/05/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
10/05/2020	Ibrahim Hamed	Staff Attorney		69	10.25	\$400.00	\$4,100.00
10/05/2020	Addison F. Golladay	Staff Attorney		69	7.50	\$400.00	\$3,000.00
10/05/2020	Erick Ladson	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/05/2020	Esinam Quarco	Staff Attorney		69	10.50	\$400.00	\$4,200.00
10/05/2020	Igor Faynshteyn	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/05/2020	Jed Koslow	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/05/2020	Justin Ratliff	Staff Attorney		69	6.50	\$350.00	\$2,275.00
10/05/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/05/2020	Monique Hardial	Staff Attorney		69	7.00	\$375.00	\$2,625.00
10/05/2020	Stephen Imundo	Senior Staff Attorneys		69	7.50	\$425.00	\$3,187.50
10/05/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/06/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
10/06/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
10/06/2020	Erick Ladson	Staff Attorney		69	8.50	\$400.00	\$3,400.00
10/06/2020	Esinam Quarco	Staff Attorney		69	9.50	\$400.00	\$3,800.00
10/06/2020	Ibrahim Hamed	Staff Attorney		69	10.25	\$400.00	\$4,100.00
10/06/2020	Igor Faynshteyn	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/06/2020	Jed Koslow	Staff Attorney		69	9.50	\$400.00	\$3,800.00
10/06/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/06/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/06/2020	Stephen Imundo	Senior Staff Attorneys		69	2.25	\$425.00	\$956.25
10/06/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/07/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
10/07/2020	Addison F. Golladay	Staff Attorney		69	7.50	\$400.00	\$3,000.00

10/07/2020	Erick Ladson	Staff Attorney		69	8.50	\$400.00	\$3,400.00
10/07/2020	Esinam Quarco	Staff Attorney		69	7.50	\$400.00	\$3,000.00
10/07/2020	Ibrahim Hamed	Staff Attorney		69	8.25	\$400.00	\$3,300.00
10/07/2020	Igor Faynshteyn	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/07/2020	Jed Koslow	Staff Attorney		69	10.50	\$400.00	\$4,200.00
10/07/2020	Justin Ratliff	Staff Attorney		69	5.00	\$350.00	\$1,750.00
10/07/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/07/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/07/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/08/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
10/08/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
10/08/2020	Erick Ladson	Staff Attorney		69	8.00	\$400.00	\$3,200.00
10/08/2020	Ibrahim Hamed	Staff Attorney		69	8.25	\$400.00	\$3,300.00
10/08/2020	Igor Faynshteyn	Staff Attorney		69	8.50	\$375.00	\$3,187.50
10/08/2020	Jed Koslow	Staff Attorney		69	7.00	\$400.00	\$2,800.00
10/08/2020	Justin Ratliff	Staff Attorney		69	4.50	\$350.00	\$1,575.00
10/08/2020	Lauren Cormier	Staff Attorney		69	6.00	\$375.00	\$2,250.00
10/08/2020	Monique Hardial	Staff Attorney		69	7.50	\$375.00	\$2,812.50
10/08/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/09/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
10/09/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
10/09/2020	Erick Ladson	Staff Attorney		69	6.00	\$400.00	\$2,400.00
10/09/2020	Ibrahim Hamed	Staff Attorney		69	2.00	\$400.00	\$800.00
10/09/2020	Igor Faynshteyn	Staff Attorney		69	2.50	\$375.00	\$937.50
10/09/2020	Jed Koslow	Staff Attorney		69	4.00	\$400.00	\$1,600.00
10/09/2020	Justin Ratliff	Staff Attorney		69	4.00	\$350.00	\$1,400.00
10/09/2020	Lauren Cormier	Staff Attorney		69	6.00	\$375.00	\$2,250.00
10/09/2020	Monique Hardial	Staff Attorney		69	7.50	\$375.00	\$2,812.50
10/09/2020	William Pham	Staff Attorney		69	4.00	\$375.00	\$1,500.00
10/10/2020	Addison F. Golladay	Staff Attorney		69	5.50	\$400.00	\$2,200.00
10/10/2020	Justin Ratliff	Staff Attorney		69	6.25	\$350.00	\$2,187.50
10/11/2020	Igor Faynshteyn	Staff Attorney		69	4.00	\$375.00	\$1,500.00
10/11/2020	Justin Ratliff	Staff Attorney		69	12.00	\$350.00	\$4,200.00
10/11/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00

10/12/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
10/12/2020	Addison F. Golladay	Staff Attorney		69	12.50	\$400.00	\$5,000.00
10/12/2020	Erick Ladson	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/12/2020	Esinam Quarco	Staff Attorney		69	12.50	\$400.00	\$5,000.00
10/12/2020	Helen Fikrey	Staff Attorney		69	13.00	\$400.00	\$5,200.00
10/12/2020	Ibrahim Hamed	Staff Attorney		69	10.50	\$400.00	\$4,200.00
10/12/2020	Igor Faynshteyn	Staff Attorney		69	10.00	\$375.00	\$3,750.00
10/12/2020	Ingvar Olsson	Staff Attorney		69	4.00	\$400.00	\$1,600.00
10/12/2020	Jed Koslow	Staff Attorney		69	9.25	\$400.00	\$3,700.00
10/12/2020	Justin Ratliff	Staff Attorney		69	8.00	\$350.00	\$2,800.00
10/12/2020	Lauren Cormier	Staff Attorney		69	10.50	\$375.00	\$3,937.50
10/12/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/12/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/13/2020	Brian Chau	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
10/13/2020	Brian Chau	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
10/13/2020	Addison F. Golladay	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/13/2020	Erick Ladson	Staff Attorney		69	1.75	\$400.00	\$700.00
10/13/2020	Erick Ladson	Staff Attorney		69	6.75	\$400.00	\$2,700.00
10/13/2020	Esinam Quarco	Staff Attorney		69	9.50	\$400.00	\$3,800.00
10/13/2020	Helen Fikrey	Staff Attorney		69	11.75	\$400.00	\$4,700.00
10/13/2020	Ibrahim Hamed	Staff Attorney		69	10.25	\$400.00	\$4,100.00
10/13/2020	Igor Faynshteyn	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/13/2020	Ingvar Olsson	Staff Attorney		69	8.50	\$400.00	\$3,400.00
10/13/2020	Jed Koslow	Staff Attorney		69	10.25	\$400.00	\$4,100.00
10/13/2020	Justin Ratliff	Staff Attorney		69	8.00	\$350.00	\$2,800.00
10/13/2020	Lauren Cormier	Staff Attorney		69	9.25	\$375.00	\$3,468.75
10/13/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/13/2020	Stephen Imundo	Senior Staff Attorneys		69	1.25	\$425.00	\$531.25
10/13/2020	Stephen Imundo	Senior Staff Attorneys		69	3.75	\$425.00	\$1,593.75
10/13/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
10/14/2020	Brian Chau	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
10/14/2020	Brian Chau	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
10/14/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
10/14/2020	Erick Ladson	Staff Attorney		69	8.50	\$400.00	\$3,400.00

10/14/2020	Esinam Quarco	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/14/2020	Helen Fikrey	Staff Attorney		69	2.00	\$400.00	\$800.00
10/14/2020	Ibrahim Hamed	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/14/2020	Igor Faynshteyn	Staff Attorney		69	9.50	\$375.00	\$3,562.50
10/14/2020	Ingvar Olsson	Staff Attorney		69	7.50	\$400.00	\$3,000.00
10/14/2020	Jed Koslow	Staff Attorney		69	8.50	\$400.00	\$3,400.00
10/14/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/14/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/14/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
10/15/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
10/15/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
10/15/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
10/15/2020	Erick Ladson	Staff Attorney		69	8.00	\$400.00	\$3,200.00
10/15/2020	Esinam Quarco	Staff Attorney		69	6.00	\$400.00	\$2,400.00
10/15/2020	Helen Fikrey	Staff Attorney		69	7.00	\$400.00	\$2,800.00
10/15/2020	Ibrahim Hamed	Staff Attorney		69	8.25	\$400.00	\$3,300.00
10/15/2020	Igor Faynshteyn	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/15/2020	Ingvar Olsson	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/15/2020	Jed Koslow	Staff Attorney		69	7.75	\$400.00	\$3,100.00
10/15/2020	Justin Ratliff	Staff Attorney		69	5.00	\$350.00	\$1,750.00
10/15/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/15/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/15/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
10/16/2020	Brian Chau	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
10/16/2020	Addison F. Golladay	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/16/2020	Erick Ladson	Staff Attorney		69	10.00	\$400.00	\$4,000.00
10/16/2020	Esinam Quarco	Staff Attorney		69	3.00	\$400.00	\$1,200.00
10/16/2020	Ibrahim Hamed	Staff Attorney		69	2.00	\$400.00	\$800.00
10/16/2020	Igor Faynshteyn	Staff Attorney		69	3.50	\$375.00	\$1,312.50
10/16/2020	Jed Koslow	Staff Attorney		69	4.25	\$400.00	\$1,700.00
10/16/2020	Justin Ratliff	Staff Attorney		69	7.00	\$350.00	\$2,450.00

10/16/2020	Lauren Cormier	Staff Attorney		69	4.50	\$375.00	\$1,687.50
10/16/2020	Monique Hardial	Staff Attorney		69	4.00	\$375.00	\$1,500.00
10/16/2020	Stephen Imundo	Senior Staff Attorneys		69	7.75	\$425.00	\$3,293.75
10/17/2020	Brian Chau	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
10/17/2020	Addison F. Golladay	Staff Attorney		69	6.00	\$400.00	\$2,400.00
10/17/2020	Erick Ladson	Staff Attorney		69	8.50	\$400.00	\$3,400.00
10/17/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/17/2020	Stephen Imundo	Senior Staff Attorneys		69	8.75	\$425.00	\$3,718.75
10/18/2020	Brian Chau	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
10/18/2020	Addison F. Golladay	Staff Attorney		69	10.50	\$400.00	\$4,200.00
10/18/2020	Erick Ladson	Staff Attorney		69	5.50	\$400.00	\$2,200.00
10/18/2020	Justin Ratliff	Staff Attorney		69	10.75	\$350.00	\$3,762.50
10/18/2020	Lauren Cormier	Staff Attorney		69	9.50	\$375.00	\$3,562.50
10/18/2020	Stephen Imundo	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
10/18/2020	William Pham	Staff Attorney		69	2.50	\$375.00	\$937.50
10/19/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
10/19/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
10/19/2020	Erick Ladson	Staff Attorney		69	5.00	\$400.00	\$2,000.00
10/19/2020	Erick Ladson	Staff Attorney		69	1.50	\$400.00	\$600.00
10/19/2020	Erick Ladson	Staff Attorney		69	1.25	\$400.00	\$500.00
10/19/2020	Esinam Quarco	Staff Attorney		69	11.00	\$400.00	\$4,400.00
10/19/2020	Ibrahim Hamed	Staff Attorney		69	10.50	\$400.00	\$4,200.00
10/19/2020	Igor Faynshteyn	Staff Attorney		69	11.00	\$375.00	\$4,125.00
10/19/2020	Ingvar Olsson	Staff Attorney		69	11.00	\$400.00	\$4,400.00
10/19/2020	Jed Koslow	Staff Attorney		69	6.75	\$400.00	\$2,700.00
10/19/2020	Jed Koslow	Staff Attorney		69	2.75	\$400.00	\$1,100.00
10/19/2020	Justin Ratliff	Staff Attorney		69	3.25	\$350.00	\$1,137.50
10/19/2020	Justin Ratliff	Staff Attorney		69	3.75	\$350.00	\$1,312.50
10/19/2020	Lauren Cormier	Staff Attorney		69	11.75	\$375.00	\$4,406.25
10/19/2020	Monique Hardial	Staff Attorney		69	10.00	\$375.00	\$3,750.00
10/19/2020	Stephen Imundo	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
10/19/2020	Stephen Imundo	Senior Staff Attorneys		69	12.50	\$425.00	\$5,312.50

10/19/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
10/20/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
10/20/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
10/20/2020	Erick Ladson	Staff Attorney		69	10.00	\$400.00	\$4,000.00
10/20/2020	Esinam Quarco	Staff Attorney		69	8.00	\$400.00	\$3,200.00
10/20/2020	Ibrahim Hamed	Staff Attorney		69	9.50	\$400.00	\$3,800.00
10/20/2020	Igor Faynshteyn	Staff Attorney		69	11.00	\$375.00	\$4,125.00
10/20/2020	Ingvar Olsson	Staff Attorney		69	7.75	\$400.00	\$3,100.00
10/20/2020	Jed Koslow	Staff Attorney		69	7.75	\$400.00	\$3,100.00
10/20/2020	Jed Koslow	Staff Attorney		69	2.75	\$400.00	\$1,100.00
10/20/2020	Justin Ratliff	Staff Attorney		69	7.00	\$350.00	\$2,450.00
10/20/2020	Lauren Cormier	Staff Attorney		69	12.75	\$375.00	\$4,781.25
10/20/2020	Monique Hardial	Staff Attorney		69	12.00	\$375.00	\$4,500.00
10/20/2020	Stephen Imundo	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
10/20/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
10/21/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
10/21/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
10/21/2020	Addison F. Golladay	Staff Attorney		69	10.00	\$400.00	\$4,000.00
10/21/2020	Erick Ladson	Staff Attorney		69	13.00	\$400.00	\$5,200.00
10/21/2020	Esinam Quarco	Staff Attorney		69	7.00	\$400.00	\$2,800.00
10/21/2020	Ibrahim Hamed	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/21/2020	Igor Faynshteyn	Staff Attorney		69	9.50	\$375.00	\$3,562.50
10/21/2020	Ingvar Olsson	Staff Attorney		69	7.50	\$400.00	\$3,000.00
10/21/2020	Jed Koslow	Staff Attorney		69	8.50	\$400.00	\$3,400.00
10/21/2020	Jose Echegaray	Case Managers		69	0.25	\$350.00	\$87.50
10/21/2020	Justin Ratliff	Staff Attorney		69	7.00	\$350.00	\$2,450.00
10/21/2020	Lauren Cormier	Staff Attorney		69	13.50	\$375.00	\$5,062.50
10/21/2020	Monique Hardial	Staff Attorney		69	4.00	\$375.00	\$1,500.00
10/21/2020	Stephen Imundo	Senior Staff Attorneys		69	1.75	\$425.00	\$743.75
10/21/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
10/22/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
10/22/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50

10/22/2020	Addison F. Golladay	Staff Attorney		69	10.00	\$400.00	\$4,000.00
10/22/2020	Erick Ladson	Staff Attorney		69	10.00	\$400.00	\$4,000.00
10/22/2020	Esinam Quarco	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/22/2020	Ibrahim Hamed	Staff Attorney		69	8.00	\$400.00	\$3,200.00
10/22/2020	Igor Faynshteyn	Staff Attorney		69	4.50	\$375.00	\$1,687.50
10/22/2020	Ingvar Olsson	Staff Attorney		69	7.00	\$400.00	\$2,800.00
10/22/2020	Jed Koslow	Staff Attorney		69	6.75	\$400.00	\$2,700.00
10/22/2020	Jed Koslow	Staff Attorney		69	2.50	\$400.00	\$1,000.00
10/22/2020	Justin Ratliff	Staff Attorney		69	8.00	\$350.00	\$2,800.00
10/22/2020	Lauren Cormier	Staff Attorney		69	9.25	\$375.00	\$3,468.75
10/22/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/22/2020	Stephen Imundo	Senior Staff Attorneys		69	2.25	\$425.00	\$956.25
10/22/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
10/23/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
10/23/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
10/23/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
10/23/2020	Erick Ladson	Staff Attorney		69	9.25	\$400.00	\$3,700.00
10/23/2020	Esinam Quarco	Staff Attorney		69	5.00	\$400.00	\$2,000.00
10/23/2020	Helen Fikrey	Staff Attorney		69	6.00	\$400.00	\$2,400.00
10/23/2020	Ibrahim Hamed	Staff Attorney		69	3.00	\$400.00	\$1,200.00
10/23/2020	Igor Faynshteyn	Staff Attorney		69	4.00	\$375.00	\$1,500.00
10/23/2020	Ingvar Olsson	Staff Attorney		69	6.75	\$400.00	\$2,700.00
10/23/2020	Jed Koslow	Staff Attorney		69	2.25	\$400.00	\$900.00
10/23/2020	Justin Ratliff	Staff Attorney		69	3.00	\$350.00	\$1,050.00
10/23/2020	Lauren Cormier	Staff Attorney		69	5.00	\$375.00	\$1,875.00
10/23/2020	Monique Hardial	Staff Attorney		69	5.00	\$375.00	\$1,875.00
10/23/2020	William Pham	Staff Attorney		69	2.00	\$375.00	\$750.00
10/24/2020	Addison F. Golladay	Staff Attorney		69	5.00	\$400.00	\$2,000.00
10/24/2020	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
10/24/2020	Helen Fikrey	Staff Attorney		69	5.50	\$400.00	\$2,200.00
10/24/2020	Justin Ratliff	Staff Attorney		69	6.00	\$350.00	\$2,100.00

10/25/2020	Addison F. Golladay	Staff Attorney		69	7.00	\$400.00	\$2,800.00
10/25/2020	Brian Chau	Senior Staff Attorneys		69	7.00	\$425.00	\$2,975.00
10/25/2020	Erick Ladson	Staff Attorney		69	10.00	\$400.00	\$4,000.00
10/25/2020	Helen Fikrey	Staff Attorney		69	5.00	\$400.00	\$2,000.00
10/25/2020	Justin Ratliff	Staff Attorney		69	2.00	\$350.00	\$700.00
10/26/2020	Addison F. Golladay	Staff Attorney		69	7.50	\$400.00	\$3,000.00
10/26/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
10/26/2020	Colette Foster	Staff Attorney		69	11.00	\$400.00	\$4,400.00
10/26/2020	Erick Ladson	Staff Attorney		69	1.00	\$400.00	\$400.00
10/26/2020	Erick Ladson	Staff Attorney		69	10.00	\$400.00	\$4,000.00
10/26/2020	Esinam Quarco	Staff Attorney		69	11.50	\$400.00	\$4,600.00
10/26/2020	Helen Fikrey	Staff Attorney		69	10.25	\$400.00	\$4,100.00
10/26/2020	Ibrahim Hamed	Staff Attorney		69	9.75	\$400.00	\$3,900.00
10/26/2020	Igor Faynshteyn	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/26/2020	Ingvar Olsson	Staff Attorney		69	13.75	\$400.00	\$5,500.00
10/26/2020	Jed Koslow	Staff Attorney		69	3.00	\$400.00	\$1,200.00
10/26/2020	Jed Koslow	Staff Attorney		69	7.25	\$400.00	\$2,900.00
10/26/2020	Justin Ratliff	Staff Attorney		69	5.00	\$350.00	\$1,750.00
10/26/2020	Justin Ratliff	Staff Attorney		69	6.50	\$350.00	\$2,275.00
10/26/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/26/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/26/2020	Richard Gluck	Senior Counsel		69	3.25	\$800.00	\$2,600.00
10/26/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/27/2020	Addison F. Golladay	Staff Attorney		69	11.00	\$400.00	\$4,400.00
10/27/2020	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
10/27/2020	Colette Foster	Staff Attorney		69	13.00	\$400.00	\$5,200.00
10/27/2020	Erick Ladson	Staff Attorney		69	11.00	\$400.00	\$4,400.00
10/27/2020	Esinam Quarco	Staff Attorney		69	10.00	\$400.00	\$4,000.00
10/27/2020	Helen Fikrey	Staff Attorney		69	12.25	\$400.00	\$4,900.00
10/27/2020	Ibrahim Hamed	Staff Attorney		69	9.75	\$400.00	\$3,900.00
10/27/2020	Igor Faynshteyn	Staff Attorney		69	10.00	\$375.00	\$3,750.00
10/27/2020	Ingvar Olsson	Staff Attorney		69	12.25	\$400.00	\$4,900.00
10/27/2020	Jed Koslow	Staff Attorney		69	7.25	\$400.00	\$2,900.00
10/27/2020	Justin Ratliff	Staff Attorney		69	9.00	\$350.00	\$3,150.00
10/27/2020	Lauren Cormier	Staff Attorney		69	9.00	\$375.00	\$3,375.00

10/27/2020	Monique Hardial	Staff Attorney		69	11.00	\$375.00	\$4,125.00
10/27/2020	Stephen Imundo	Senior Staff Attorneys		69	2.00	\$425.00	\$850.00
10/27/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/28/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
10/28/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
10/28/2020	Colette Foster	Staff Attorney		69	8.00	\$400.00	\$3,200.00
10/28/2020	Erick Ladson	Staff Attorney		69	7.50	\$400.00	\$3,000.00
10/28/2020	Esinam Quarco	Staff Attorney		69	7.00	\$400.00	\$2,800.00
10/28/2020	Helen Fikrey	Staff Attorney		69	9.25	\$400.00	\$3,700.00
10/28/2020	Ibrahim Hamed	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/28/2020	Igor Faynshteyn	Staff Attorney		69	7.00	\$375.00	\$2,625.00
10/28/2020	Jed Koslow	Staff Attorney		69	6.75	\$400.00	\$2,700.00
10/28/2020	Lauren Cormier	Staff Attorney		69	7.00	\$375.00	\$2,625.00
10/28/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/28/2020	Stephen Imundo	Senior Staff Attorneys		69	1.25	\$425.00	\$531.25
10/28/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/29/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
10/29/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
10/29/2020	Colette Foster	Staff Attorney		69	8.00	\$400.00	\$3,200.00
10/29/2020	Erick Ladson	Staff Attorney		69	6.50	\$400.00	\$2,600.00
10/29/2020	Esinam Quarco	Staff Attorney		69	4.00	\$400.00	\$1,600.00
10/29/2020	Helen Fikrey	Staff Attorney		69	8.25	\$400.00	\$3,300.00
10/29/2020	Ibrahim Hamed	Staff Attorney		69	8.00	\$400.00	\$3,200.00
10/29/2020	Igor Faynshteyn	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/29/2020	Jed Koslow	Staff Attorney		69	11.25	\$400.00	\$4,500.00
10/29/2020	Justin Ratliff	Staff Attorney		69	8.00	\$350.00	\$2,800.00
10/29/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
10/29/2020	Monique Hardial	Staff Attorney		69	8.25	\$375.00	\$3,093.75
10/29/2020	Stephen Imundo	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
10/29/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
10/29/2020	Esinam Quarco	Staff Attorney		69	8.00	\$400.00	\$3,200.00
10/29/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
10/30/2020	Addison F. Golladay	Staff Attorney		69	10.50	\$400.00	\$4,200.00
10/30/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
10/30/2020	Colette Foster	Staff Attorney		69	8.00	\$400.00	\$3,200.00
10/30/2020	Erick Ladson	Staff Attorney		69	4.00	\$400.00	\$1,600.00
10/30/2020	Esinam Quarco	Staff Attorney		69	3.50	\$400.00	\$1,400.00
10/30/2020	Ibrahim Hamed	Staff Attorney		69	3.50	\$400.00	\$1,400.00

10/30/2020	Igor Faynshteyn	Staff Attorney		69	5.00	\$375.00	\$1,875.00
10/30/2020	Jed Koslow	Staff Attorney		69	4.50	\$400.00	\$1,800.00
10/30/2020	Justin Ratliff	Staff Attorney		69	3.00	\$350.00	\$1,050.00
10/30/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
10/30/2020	Monique Hardial	Staff Attorney		69	3.00	\$375.00	\$1,125.00
10/30/2020	William Pham	Staff Attorney		69	4.00	\$375.00	\$1,500.00
10/30/2020	Monique Hardial	Staff Attorney		69	2.75	\$375.00	\$1,031.25
10/31/2020	Addison F. Golladay	Staff Attorney		69	9.00	\$400.00	\$3,600.00
10/31/2020	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
10/31/2020	Erick Ladson	Staff Attorney		69	12.00	\$400.00	\$4,800.00
10/31/2020	Lauren Cormier	Staff Attorney		69	5.00	\$375.00	\$1,875.00
11/01/2020	Addison F. Golladay	Staff Attorney		69	9.00	\$400.00	\$3,600.00
11/01/2020	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
11/01/2020	Erick Ladson	Staff Attorney		69	11.50	\$400.00	\$4,600.00
11/01/2020	Igor Faynshteyn	Staff Attorney		69	2.00	\$375.00	\$750.00
11/01/2020	Justin Ratliff	Staff Attorney		69	8.50	\$350.00	\$2,975.00
11/01/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/01/2020	Stephen Imundo	Senior Staff Attorneys		69	2.00	\$425.00	\$850.00
11/02/2020	Addison F. Golladay	Staff Attorney		69	7.00	\$400.00	\$2,800.00
11/02/2020	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
11/02/2020	Esinam Quarco	Staff Attorney		69	8.50	\$400.00	\$3,400.00
11/02/2020	Ibrahim Hamed	Staff Attorney		69	10.00	\$400.00	\$4,000.00
11/02/2020	Igor Faynshteyn	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/02/2020	Jed Koslow	Staff Attorney		69	9.25	\$400.00	\$3,700.00
11/02/2020	Lauren Cormier	Staff Attorney		69	4.50	\$375.00	\$1,687.50
11/02/2020	Monique Hardial	Staff Attorney		69	3.50	\$375.00	\$1,312.50
11/02/2020	Stephen Imundo	Senior Staff Attorneys		69	1.50	\$425.00	\$637.50
11/02/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
11/02/2020	Lauren Cormier	Staff Attorney		69	4.50	\$375.00	\$1,687.50
11/02/2020	Monique Hardial	Staff Attorney		69	3.50	\$375.00	\$1,312.50
11/03/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
11/03/2020	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
11/03/2020	Erick Ladson	Staff Attorney		69	13.50	\$400.00	\$5,400.00
11/03/2020	Ibrahim Hamed	Staff Attorney		69	5.00	\$400.00	\$2,000.00
11/03/2020	Igor Faynshteyn	Staff Attorney		69	7.00	\$375.00	\$2,625.00
11/03/2020	Jed Koslow	Staff Attorney		69	7.50	\$400.00	\$3,000.00

11/03/2020	Justin Ratliff	Staff Attorney		69	8.00	\$350.00	\$2,800.00
11/03/2020	Lauren Cormier	Staff Attorney		69	4.75	\$375.00	\$1,781.25
11/03/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/03/2020	Stephen Imundo	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
11/03/2020	Stephen Imundo	Senior Staff Attorneys		69	1.25	\$425.00	\$531.25
11/03/2020	Ibrahim Hamed	Staff Attorney		69	5.00	\$400.00	\$2,000.00
11/03/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
11/03/2020	Lauren Cormier	Staff Attorney		69	4.75	\$375.00	\$1,781.25
11/04/2020	Addison F. Golladay	Staff Attorney		69	2.50	\$400.00	\$1,000.00
11/04/2020	Addison F. Golladay	Staff Attorney		69	4.50	\$400.00	\$1,800.00
11/04/2020	Brian Chau	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
11/04/2020	Erick Ladson	Staff Attorney		69	13.50	\$400.00	\$5,400.00
11/04/2020	Esinam Quarco	Staff Attorney		69	3.50	\$400.00	\$1,400.00
11/04/2020	Esinam Quarco	Staff Attorney		69	1.50	\$400.00	\$600.00
11/04/2020	Esinam Quarco	Staff Attorney		69	1.50	\$400.00	\$600.00
11/04/2020	Ibrahim Hamed	Staff Attorney		69	9.25	\$400.00	\$3,700.00
11/04/2020	Igor Faynshteyn	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/04/2020	Ingvar Olsson	Staff Attorney		69	7.00	\$400.00	\$2,800.00
11/04/2020	Jed Koslow	Staff Attorney		69	7.75	\$400.00	\$3,100.00
11/04/2020	Justin Ratliff	Staff Attorney		69	7.75	\$350.00	\$2,712.50
11/04/2020	Lauren Cormier	Staff Attorney		69	4.50	\$375.00	\$1,687.50
11/04/2020	Monique Hardial	Staff Attorney		69	7.50	\$375.00	\$2,812.50
11/04/2020	Preya Rodriguez	Paralegal		69	7.75	\$325.00	\$2,518.75
11/04/2020	Stephen Imundo	Senior Staff Attorneys		69	10.50	\$425.00	\$4,462.50
11/04/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
11/04/2020	Lauren Cormier	Staff Attorney		69	4.50	\$375.00	\$1,687.50
11/05/2020	Addison F. Golladay	Staff Attorney		69	12.50	\$400.00	\$5,000.00
11/05/2020	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
11/05/2020	Erick Ladson	Staff Attorney		69	15.50	\$400.00	\$6,200.00
11/05/2020	Esinam Quarco	Staff Attorney		69	10.00	\$400.00	\$4,000.00

11/05/2020	Ibrahim Hamed	Staff Attorney		69	9.00	\$400.00	\$3,600.00
11/05/2020	Igor Faynshteyn	Staff Attorney		69	9.00	\$375.00	\$3,375.00
11/05/2020	Jed Koslow	Staff Attorney		69	9.25	\$400.00	\$3,700.00
11/05/2020	Monique Hardial	Staff Attorney		69	3.00	\$375.00	\$1,125.00
11/05/2020	Preya Rodriguez	Paralegal		69	5.00	\$325.00	\$1,625.00
11/05/2020	Monique Hardial	Staff Attorney		69	3.00	\$375.00	\$1,125.00
11/05/2020	Monique Hardial	Staff Attorney		69	3.00	\$375.00	\$1,125.00
11/05/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
11/06/2020	Addison F. Golladay	Staff Attorney		69	16.00	\$400.00	\$6,400.00
11/06/2020	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
11/06/2020	Esinam Quarco	Staff Attorney		69	6.25	\$400.00	\$2,500.00
11/06/2020	Ibrahim Hamed	Staff Attorney		69	1.00	\$400.00	\$400.00
11/06/2020	Igor Faynshteyn	Staff Attorney		69	6.00	\$375.00	\$2,250.00
11/06/2020	Jed Koslow	Staff Attorney		69	6.25	\$400.00	\$2,500.00
11/06/2020	Justin Ratliff	Staff Attorney		69	8.00	\$350.00	\$2,800.00
11/06/2020	Monique Hardial	Staff Attorney		69	6.00	\$375.00	\$2,250.00
11/06/2020	Stephen Imundo	Senior Staff Attorneys		69	8.50	\$425.00	\$3,612.50
11/06/2020	William Pham	Staff Attorney		69	2.00	\$375.00	\$750.00
11/06/2020	Lauren Cormier	Staff Attorney		69	4.75	\$375.00	\$1,781.25
11/07/2020	Brian Chau	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
11/07/2020	Justin Ratliff	Staff Attorney		69	8.50	\$350.00	\$2,975.00
11/07/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
11/08/2020	Addison F. Golladay	Staff Attorney		69	10.00	\$400.00	\$4,000.00
11/08/2020	Erick Ladson	Staff Attorney		69	5.00	\$400.00	\$2,000.00
11/08/2020	Igor Faynshteyn	Staff Attorney		69	2.00	\$375.00	\$750.00
11/08/2020	Justin Ratliff	Staff Attorney		69	7.00	\$350.00	\$2,450.00
11/08/2020	Lauren Cormier	Staff Attorney		69	3.00	\$375.00	\$1,125.00
11/09/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
11/09/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
11/09/2020	Erick Ladson	Staff Attorney		69	8.50	\$400.00	\$3,400.00
11/09/2020	Esinam Quarco	Staff Attorney		69	10.00	\$400.00	\$4,000.00
11/09/2020	Helen Fikrey	Staff Attorney		69	9.00	\$400.00	\$3,600.00
11/09/2020	Ibrahim Hamed	Staff Attorney		69	10.25	\$400.00	\$4,100.00
11/09/2020	Igor Faynshteyn	Staff Attorney		69	8.00	\$375.00	\$3,000.00

11/09/2020	Jed Koslow	Staff Attorney		69	12.50	\$400.00	\$5,000.00
11/09/2020	Justin Ratliff	Staff Attorney		69	7.75	\$350.00	\$2,712.50
11/09/2020	Lauren Cormier	Staff Attorney		69	7.00	\$375.00	\$2,625.00
11/09/2020	Monique Hardial	Staff Attorney		69	9.50	\$375.00	\$3,562.50
11/09/2020	Stephen Imundo	Senior Staff Attorneys		69	1.50	\$425.00	\$637.50
11/09/2020	Stephen Imundo	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
11/09/2020	William Pham	Staff Attorney		69	4.50	\$375.00	\$1,687.50
11/09/2020	William Pham	Staff Attorney		69	4.50	\$375.00	\$1,687.50
11/10/2020	Addison F. Golladay	Staff Attorney		69	7.50	\$400.00	\$3,000.00
11/10/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
11/10/2020	Erick Ladson	Staff Attorney		69	8.75	\$400.00	\$3,500.00
11/10/2020	Esinam Quarco	Staff Attorney		69	10.00	\$400.00	\$4,000.00
11/10/2020	Helen Fikrey	Staff Attorney		69	12.00	\$400.00	\$4,800.00
11/10/2020	Ibrahim Hamed	Staff Attorney		69	10.25	\$400.00	\$4,100.00
11/10/2020	Igor Faynshteyn	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/10/2020	Jed Koslow	Staff Attorney		69	9.25	\$400.00	\$3,700.00
11/10/2020	Justin Ratliff	Staff Attorney		69	8.00	\$350.00	\$2,800.00
11/10/2020	Lauren Cormier	Staff Attorney		69	6.50	\$375.00	\$2,437.50
11/10/2020	Monique Hardial	Staff Attorney		69	9.50	\$375.00	\$3,562.50
11/10/2020	Stephen Imundo	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
11/10/2020	Stephen Imundo	Senior Staff Attorneys		69	3.25	\$425.00	\$1,381.25
11/10/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
11/11/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
11/11/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
11/11/2020	Esinam Quarco	Staff Attorney		69	11.00	\$400.00	\$4,400.00
11/11/2020	Helen Fikrey	Staff Attorney		69	8.00	\$400.00	\$3,200.00
11/11/2020	Ibrahim Hamed	Staff Attorney		69	10.00	\$400.00	\$4,000.00
11/11/2020	Igor Faynshteyn	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/11/2020	Jed Koslow	Staff Attorney		69	9.25	\$400.00	\$3,700.00
11/11/2020	Justin Ratliff	Staff Attorney		69	6.00	\$350.00	\$2,100.00
11/11/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
11/11/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00

11/11/2020	Stephen Imundo	Senior Staff Attorneys		69	8.25	\$425.00	\$3,506.25
11/11/2020	Stephen Imundo	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
11/11/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
11/12/2020	Addison F. Golladay	Staff Attorney		69	8.00	\$400.00	\$3,200.00
11/12/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
11/12/2020	Helen Fikrey	Staff Attorney		69	5.00	\$400.00	\$2,000.00
11/12/2020	Ibrahim Hamed	Staff Attorney		69	8.25	\$400.00	\$3,300.00
11/12/2020	Igor Faynshteyn	Staff Attorney		69	7.00	\$375.00	\$2,625.00
11/12/2020	Ingvar Olsson	Staff Attorney		69	8.25	\$400.00	\$3,300.00
11/12/2020	Jed Koslow	Staff Attorney		69	4.50	\$400.00	\$1,800.00
11/12/2020	Justin Ratliff	Staff Attorney		69	8.00	\$350.00	\$2,800.00
11/12/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
11/12/2020	Monique Hardial	Staff Attorney		69	7.00	\$375.00	\$2,625.00
11/12/2020	Jed Koslow	Staff Attorney		69	4.50	\$400.00	\$1,800.00
11/12/2020	Stephen Imundo	Senior Staff Attorneys		69	2.75	\$425.00	\$1,168.75
11/12/2020	Stephen Imundo	Senior Staff Attorneys		69	8.25	\$425.00	\$3,506.25
11/12/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
11/12/2020	Addison F. Golladay	Staff Attorney		69	1.00	\$400.00	\$400.00
11/13/2020	Addison F. Golladay	Staff Attorney		69	7.50	\$400.00	\$3,000.00
11/13/2020	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
11/13/2020	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
11/13/2020	Erick Ladson	Staff Attorney		69	10.25	\$400.00	\$4,100.00
11/13/2020	Esinam Quarco	Staff Attorney		69	4.50	\$400.00	\$1,800.00
11/13/2020	Helen Fikrey	Staff Attorney		69	6.50	\$400.00	\$2,600.00
11/13/2020	Ibrahim Hamed	Staff Attorney		69	1.25	\$400.00	\$500.00
11/13/2020	Igor Faynshteyn	Staff Attorney		69	6.00	\$375.00	\$2,250.00
11/13/2020	Ingvar Olsson	Staff Attorney		69	1.50	\$400.00	\$600.00
11/13/2020	Justin Ratliff	Staff Attorney		69	8.75	\$350.00	\$3,062.50
11/13/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
11/13/2020	Monique Hardial	Staff Attorney		69	5.00	\$375.00	\$1,875.00
11/13/2020	William Pham	Staff Attorney		69	4.00	\$375.00	\$1,500.00
11/14/2020	Erick Ladson	Staff Attorney		69	2.00	\$400.00	\$800.00
11/14/2020	Erick Ladson	Staff Attorney		69	2.00	\$400.00	\$800.00
11/14/2020	Helen Fikrey	Staff Attorney		69	8.00	\$400.00	\$3,200.00
11/15/2020	Helen Fikrey	Staff Attorney		69	6.50	\$400.00	\$2,600.00
11/15/2020	Igor Faynshteyn	Staff Attorney		69	3.00	\$375.00	\$1,125.00

11/15/2020	Justin Ratliff	Staff Attorney		69	1.50	\$350.00	\$525.00
11/16/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
11/16/2020	Andrew Boruch	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
11/16/2020	Andrew Boruch	Senior Staff Attorneys		69	3.75	\$425.00	\$1,593.75
11/16/2020	Brian Chau	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
11/16/2020	Daniel Renehan	Staff Attorney		69	8.50	\$400.00	\$3,400.00
11/16/2020	Erick Ladson	Staff Attorney		69	9.00	\$400.00	\$3,600.00
11/16/2020	Esinam Quarco	Staff Attorney		69	8.50	\$400.00	\$3,400.00
11/16/2020	Helen Fikrey	Staff Attorney		69	13.50	\$400.00	\$5,400.00
11/16/2020	Ibrahim Hamed	Staff Attorney		69	11.50	\$400.00	\$4,600.00
11/16/2020	Igor Faynshteyn	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/16/2020	Ingvar Olsson	Staff Attorney		69	12.75	\$400.00	\$5,100.00
11/16/2020	Jed Koslow	Staff Attorney		69	10.25	\$400.00	\$4,100.00
11/16/2020	Justin Ratliff	Staff Attorney		69	8.00	\$350.00	\$2,800.00
11/16/2020	Lauren Cormier	Staff Attorney		69	4.50	\$375.00	\$1,687.50
11/16/2020	Ryan Candee	Senior Staff Attorneys		69	8.50	\$425.00	\$3,612.50
11/16/2020	Jose Echegaray	Case Managers		69	0.75	\$350.00	\$262.50
11/16/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
11/17/2020	Addison F. Golladay	Staff Attorney		69	10.00	\$400.00	\$4,000.00
11/17/2020	Andrew Boruch	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
11/17/2020	Andrew Boruch	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
11/17/2020	Brian Chau	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
11/17/2020	Daniel Renehan	Staff Attorney		69	9.00	\$400.00	\$3,600.00
11/17/2020	Erick Ladson	Staff Attorney		69	10.50	\$400.00	\$4,200.00
11/17/2020	Esinam Quarco	Staff Attorney		69	4.25	\$400.00	\$1,700.00
11/17/2020	Helen Fikrey	Staff Attorney		69	12.25	\$400.00	\$4,900.00
11/17/2020	Ibrahim Hamed	Staff Attorney		69	11.25	\$400.00	\$4,500.00
11/17/2020	Igor Faynshteyn	Staff Attorney		69	9.50	\$375.00	\$3,562.50
11/17/2020	Ingvar Olsson	Staff Attorney		69	10.50	\$400.00	\$4,200.00
11/17/2020	Jed Koslow	Staff Attorney		69	7.50	\$400.00	\$3,000.00
11/17/2020	Jed Koslow	Staff Attorney		69	2.75	\$400.00	\$1,100.00
11/17/2020	Justin Ratliff	Staff Attorney		69	7.00	\$350.00	\$2,450.00

11/17/2020	Lauren Cormier	Staff Attorney		69	9.00	\$375.00	\$3,375.00
11/17/2020	Monique Hardial	Staff Attorney		69	12.00	\$375.00	\$4,500.00
11/17/2020	Ryan Candee	Senior Staff Attorneys		69	9.25	\$425.00	\$3,931.25
11/17/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
11/17/2020	Esinam Quarco	Staff Attorney		69	4.00	\$400.00	\$1,600.00
11/18/2020	Addison F. Golladay	Staff Attorney		69	8.50	\$400.00	\$3,400.00
11/18/2020	Andrew Boruch	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
11/18/2020	Andrew Boruch	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
11/18/2020	Brian Chau	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
11/18/2020	Daniel Renehan	Staff Attorney		69	9.50	\$400.00	\$3,800.00
11/18/2020	Erick Ladson	Staff Attorney		69	9.50	\$400.00	\$3,800.00
11/18/2020	Esinam Quarco	Staff Attorney		69	4.50	\$400.00	\$1,800.00
11/18/2020	Helen Fikrey	Staff Attorney		69	14.75	\$400.00	\$5,900.00
11/18/2020	Ibrahim Hamed	Staff Attorney		69	9.00	\$400.00	\$3,600.00
11/18/2020	Igor Faynshteyn	Staff Attorney		69	7.50	\$375.00	\$2,812.50
11/18/2020	Ingvar Olsson	Staff Attorney		69	9.00	\$400.00	\$3,600.00
11/18/2020	Jed Koslow	Staff Attorney		69	1.25	\$400.00	\$500.00
11/18/2020	Jed Koslow	Staff Attorney		69	6.75	\$400.00	\$2,700.00
11/18/2020	Justin Ratliff	Staff Attorney		69	8.00	\$350.00	\$2,800.00
11/18/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/18/2020	Monique Hardial	Staff Attorney		69	12.50	\$375.00	\$4,687.50
11/18/2020	Jose Echegaray	Case Managers		69	0.50	\$350.00	\$175.00
11/18/2020	Stephen Imundo	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
11/18/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
11/18/2020	Esinam Quarco	Staff Attorney		69	4.50	\$400.00	\$1,800.00
11/19/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
11/19/2020	Andrew Boruch	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
11/19/2020	Andrew Boruch	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
11/19/2020	Brian Chau	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
11/19/2020	Daniel Renehan	Staff Attorney		69	7.00	\$400.00	\$2,800.00
11/19/2020	Erick Ladson	Staff Attorney		69	3.75	\$400.00	\$1,500.00
11/19/2020	Esinam Quarco	Staff Attorney		69	9.75	\$400.00	\$3,900.00
11/19/2020	Helen Fikrey	Staff Attorney		69	6.50	\$400.00	\$2,600.00

11/19/2020	Ibrahim Hamed	Staff Attorney		69	8.25	\$400.00	\$3,300.00
11/19/2020	Igor Faynshteyn	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/19/2020	Jose Echegaray	Case Managers		69	2.00	\$350.00	\$700.00
11/19/2020	Justin Ratliff	Staff Attorney		69	6.50	\$350.00	\$2,275.00
11/19/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/19/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
11/19/2020	Jed Koslow	Staff Attorney		69	3.50	\$400.00	\$1,400.00
11/19/2020	Ryan Candee	Senior Staff Attorneys		69	9.25	\$425.00	\$3,931.25
11/19/2020	William Pham	Staff Attorney		69	11.75	\$375.00	\$4,406.25
11/20/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
11/20/2020	Andrew Boruch	Senior Staff Attorneys		69	6.25	\$425.00	\$2,656.25
11/20/2020	Brian Chau	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
11/20/2020	Daniel Renehan	Staff Attorney		69	4.00	\$400.00	\$1,600.00
11/20/2020	Erick Ladson	Staff Attorney		69	3.50	\$400.00	\$1,400.00
11/20/2020	Esinam Quarco	Staff Attorney		69	4.50	\$400.00	\$1,800.00
11/20/2020	Igor Faynshteyn	Staff Attorney		69	3.25	\$375.00	\$1,218.75
11/20/2020	Jed Koslow	Staff Attorney		69	2.00	\$400.00	\$800.00
11/20/2020	Justin Ratliff	Staff Attorney		69	5.75	\$350.00	\$2,012.50
11/20/2020	Lauren Cormier	Staff Attorney		69	6.00	\$375.00	\$2,250.00
11/20/2020	Monique Hardial	Staff Attorney		69	6.50	\$375.00	\$2,437.50
11/20/2020	Ryan Candee	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
11/20/2020	Stephen Imundo	Senior Staff Attorneys		69	1.00	\$425.00	\$425.00
11/21/2020	Addison F. Golladay	Staff Attorney		69	3.50	\$400.00	\$1,400.00
11/21/2020	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
11/22/2020	Addison F. Golladay	Staff Attorney		69	8.50	\$400.00	\$3,400.00
11/22/2020	Igor Faynshteyn	Staff Attorney		69	3.75	\$375.00	\$1,406.25
11/22/2020	Stephen Imundo	Senior Staff Attorneys		69	1.50	\$425.00	\$637.50
11/23/2020	Addison F. Golladay	Staff Attorney		69	10.50	\$400.00	\$4,200.00
11/23/2020	Addison F. Golladay	Staff Attorney		69	3.00	\$400.00	\$1,200.00
11/23/2020	Andrew Boruch	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
11/23/2020	Andrew Boruch	Senior Staff Attorneys		69	3.25	\$425.00	\$1,381.25
11/23/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00

11/23/2020	Daniel Renehan	Staff Attorney		69	12.00	\$400.00	\$4,800.00
11/23/2020	Erick Ladson	Staff Attorney		69	10.00	\$400.00	\$4,000.00
11/23/2020	Esinam Quarco	Staff Attorney		69	11.25	\$400.00	\$4,500.00
11/23/2020	Ibrahim Hamed	Staff Attorney		69	12.00	\$400.00	\$4,800.00
11/23/2020	Igor Faynshteyn	Staff Attorney		69	10.50	\$375.00	\$3,937.50
11/23/2020	Justin Ratliff	Staff Attorney		69	4.00	\$350.00	\$1,400.00
11/23/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/23/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
11/23/2020	Ryan Candee	Senior Staff Attorneys		69	8.50	\$425.00	\$3,612.50
11/23/2020	Stephen Imundo	Senior Staff Attorneys		69	2.75	\$425.00	\$1,168.75
11/23/2020	Stephen Imundo	Senior Staff Attorneys		69	6.75	\$425.00	\$2,868.75
11/23/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
11/23/2020	Lawrence Hosmer	Senior Staff Attorneys		69	6.00	\$425.00	\$2,550.00
11/24/2020	Addison F. Golladay	Staff Attorney		69	17.00	\$400.00	\$6,800.00
11/24/2020	Andrew Boruch	Senior Staff Attorneys		69	8.75	\$425.00	\$3,718.75
11/24/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
11/24/2020	Daniel Renehan	Staff Attorney		69	10.50	\$400.00	\$4,200.00
11/24/2020	Erick Ladson	Staff Attorney		69	11.00	\$400.00	\$4,400.00
11/24/2020	Esinam Quarco	Staff Attorney		69	6.00	\$400.00	\$2,400.00
11/24/2020	Ibrahim Hamed	Staff Attorney		69	12.25	\$400.00	\$4,900.00
11/24/2020	Igor Faynshteyn	Staff Attorney		69	10.50	\$375.00	\$3,937.50
11/24/2020	Jed Koslow	Staff Attorney		69	9.25	\$400.00	\$3,700.00
11/24/2020	Justin Ratliff	Staff Attorney		69	4.00	\$350.00	\$1,400.00
11/24/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/24/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/24/2020	Ryan Candee	Senior Staff Attorneys		69	8.25	\$425.00	\$3,506.25
11/24/2020	Stephen Imundo	Senior Staff Attorneys		69	5.50	\$425.00	\$2,337.50
11/24/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
11/25/2020	Addison F. Golladay	Staff Attorney		69	4.50	\$400.00	\$1,800.00
11/25/2020	Andrew Boruch	Senior Staff Attorneys		69	8.25	\$425.00	\$3,506.25
11/25/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
11/25/2020	Daniel Renehan	Staff Attorney		69	9.00	\$400.00	\$3,600.00

11/25/2020	Erick Ladson	Staff Attorney		69	4.50	\$400.00	\$1,800.00
11/25/2020	Erick Ladson	Staff Attorney		69	8.00	\$400.00	\$3,200.00
11/25/2020	Esinam Quarco	Staff Attorney		69	7.00	\$400.00	\$2,800.00
11/25/2020	Ibrahim Hamed	Staff Attorney		69	11.00	\$400.00	\$4,400.00
11/25/2020	Igor Faynshteyn	Staff Attorney		69	10.00	\$375.00	\$3,750.00
11/25/2020	Jed Koslow	Staff Attorney		69	4.50	\$400.00	\$1,800.00
11/25/2020	Justin Ratliff	Staff Attorney		69	4.00	\$350.00	\$1,400.00
11/25/2020	Lauren Cormier	Staff Attorney		69	6.00	\$375.00	\$2,250.00
11/25/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/25/2020	Ryan Candee	Senior Staff Attorneys		69	9.50	\$425.00	\$4,037.50
11/25/2020	Stephen Imundo	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
11/25/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
11/28/2020	Andrew Boruch	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
11/28/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
11/28/2020	Daniel Renehan	Staff Attorney		69	4.25	\$400.00	\$1,700.00
11/28/2020	Esinam Quarco	Staff Attorney		69	7.75	\$400.00	\$3,100.00
11/28/2020	Ibrahim Hamed	Staff Attorney		69	4.75	\$400.00	\$1,900.00
11/28/2020	Justin Ratliff	Staff Attorney		69	8.25	\$350.00	\$2,887.50
11/28/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/28/2020	Ryan Candee	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
11/28/2020	Stephen Imundo	Senior Staff Attorneys		69	4.75	\$425.00	\$2,018.75
11/28/2020	Stephen Imundo	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
11/28/2020	Daniel Renehan	Staff Attorney		69	4.25	\$400.00	\$1,700.00
11/29/2020	Addison F. Golladay	Staff Attorney		69	5.00	\$400.00	\$2,000.00
11/29/2020	Andrew Boruch	Senior Staff Attorneys		69	2.75	\$425.00	\$1,168.75
11/29/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
11/29/2020	Erick Ladson	Staff Attorney		69	6.00	\$400.00	\$2,400.00
11/29/2020	Esinam Quarco	Staff Attorney		69	8.00	\$400.00	\$3,200.00
11/29/2020	Igor Faynshteyn	Staff Attorney		69	7.00	\$375.00	\$2,625.00
11/29/2020	Jed Koslow	Staff Attorney		69	2.75	\$400.00	\$1,100.00
11/29/2020	Justin Ratliff	Staff Attorney		69	7.00	\$350.00	\$2,450.00
11/29/2020	Lauren Cormier	Staff Attorney		69	9.50	\$375.00	\$3,562.50
11/29/2020	Monique Hardial	Staff Attorney		69	7.00	\$375.00	\$2,625.00

11/29/2020	Ryan Candee	Senior Staff Attorneys		69	7.25	\$425.00	\$3,081.25
11/30/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
11/30/2020	Andrew Boruch	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
11/30/2020	Andrew Boruch	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
11/30/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
11/30/2020	Daniel Renehan	Staff Attorney		69	9.50	\$400.00	\$3,800.00
11/30/2020	Erick Ladson	Staff Attorney		69	9.00	\$400.00	\$3,600.00
11/30/2020	Esinam Quarco	Staff Attorney		69	8.50	\$400.00	\$3,400.00
11/30/2020	Ibrahim Hamed	Staff Attorney		69	11.25	\$400.00	\$4,500.00
11/30/2020	Igor Faynshteyn	Staff Attorney		69	9.00	\$375.00	\$3,375.00
11/30/2020	Jed Koslow	Staff Attorney		69	8.50	\$400.00	\$3,400.00
11/30/2020	Jed Koslow	Staff Attorney		69	3.25	\$400.00	\$1,300.00
11/30/2020	Justin Ratliff	Staff Attorney		69	2.00	\$350.00	\$700.00
11/30/2020	Lauren Cormier	Staff Attorney		69	11.25	\$375.00	\$4,218.75
11/30/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
11/30/2020	Ryan Candee	Senior Staff Attorneys		69	5.25	\$425.00	\$2,231.25
11/30/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
12/01/2020	Addison F. Golladay	Staff Attorney		69	7.00	\$400.00	\$2,800.00
12/01/2020	Andrew Boruch	Senior Staff Attorneys		69	1.25	\$425.00	\$531.25
12/01/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/01/2020	Daniel Renehan	Staff Attorney		69	1.50	\$400.00	\$600.00
12/01/2020	Erick Ladson	Staff Attorney		69	9.00	\$400.00	\$3,600.00
12/01/2020	Esinam Quarco	Staff Attorney		69	8.50	\$400.00	\$3,400.00
12/01/2020	Ibrahim Hamed	Staff Attorney		69	11.25	\$400.00	\$4,500.00
12/01/2020	Igor Faynshteyn	Staff Attorney		69	7.50	\$375.00	\$2,812.50
12/01/2020	Jed Koslow	Staff Attorney		69	3.50	\$400.00	\$1,400.00
12/01/2020	Justin Ratliff	Staff Attorney		69	5.50	\$350.00	\$1,925.00
12/01/2020	Lauren Cormier	Staff Attorney		69	12.25	\$375.00	\$4,593.75
12/01/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
12/01/2020	Stephen Imundo	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
12/01/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
12/01/2020	Stephen Imundo	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00

12/02/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
12/02/2020	Andrew Boruch	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
12/02/2020	Andrew Boruch	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
12/02/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/02/2020	Daniel Renehan	Staff Attorney		69	8.50	\$400.00	\$3,400.00
12/02/2020	Erick Ladson	Staff Attorney		69	3.00	\$400.00	\$1,200.00
12/02/2020	Erick Ladson	Staff Attorney		69	7.00	\$400.00	\$2,800.00
12/02/2020	Esinam Quarco	Staff Attorney		69	5.25	\$400.00	\$2,100.00
12/02/2020	Ibrahim Hamed	Staff Attorney		69	9.25	\$400.00	\$3,700.00
12/02/2020	Jed Koslow	Staff Attorney		69	9.25	\$400.00	\$3,700.00
12/02/2020	Justin Ratliff	Staff Attorney		69	7.00	\$350.00	\$2,450.00
12/02/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
12/02/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
12/02/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
12/02/2020	Ryan Candee	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
12/02/2020	Stephen Imundo	Senior Staff Attorneys		69	2.25	\$425.00	\$956.25
12/02/2020	Stephen Imundo	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
12/02/2020	William Pham	Staff Attorney		69	9.50	\$375.00	\$3,562.50
12/02/2020	Lawrence Hosmer	Senior Staff Attorneys		69	1.00	\$425.00	\$425.00
12/02/2020	Stephen Imundo	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
12/03/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
12/03/2020	Brian Chau	Senior Staff Attorneys		69	13.00	\$425.00	\$5,525.00
12/03/2020	Daniel Renehan	Staff Attorney		69	8.50	\$400.00	\$3,400.00
12/03/2020	Erick Ladson	Staff Attorney		69	1.50	\$400.00	\$600.00
12/03/2020	Erick Ladson	Staff Attorney		69	4.50	\$400.00	\$1,800.00
12/03/2020	Esinam Quarco	Staff Attorney		69	6.50	\$400.00	\$2,600.00
12/03/2020	Ibrahim Hamed	Staff Attorney		69	8.25	\$400.00	\$3,300.00
12/03/2020	Igor Faynshteyn	Staff Attorney		69	7.00	\$375.00	\$2,625.00
12/03/2020	Jed Koslow	Staff Attorney		69	5.50	\$400.00	\$2,200.00
12/03/2020	Justin Ratliff	Staff Attorney		69	1.00	\$350.00	\$350.00
12/03/2020	Lauren Cormier	Staff Attorney		69	6.75	\$375.00	\$2,531.25
12/03/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
12/03/2020	Ryan Candee	Senior Staff Attorneys		69	5.75	\$425.00	\$2,443.75
12/03/2020	Stephen Imundo	Senior Staff Attorneys		69	2.00	\$425.00	\$850.00
12/03/2020	Stephen Imundo	Senior Staff Attorneys		69	7.00	\$425.00	\$2,975.00

12/03/2020	William Pham	Staff Attorney		69	9.00	\$375.00	\$3,375.00
12/04/2020	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
12/04/2020	Andrew Boruch	Senior Staff Attorneys		69	4.75	\$425.00	\$2,018.75
12/04/2020	Brian Chau	Senior Staff Attorneys		69	7.00	\$425.00	\$2,975.00
12/04/2020	Daniel Renehan	Staff Attorney		69	3.50	\$400.00	\$1,400.00
12/04/2020	Erick Ladson	Staff Attorney		69	6.00	\$400.00	\$2,400.00
12/04/2020	Esinam Quarco	Staff Attorney		69	3.50	\$400.00	\$1,400.00
12/04/2020	Igor Faynshteyn	Staff Attorney		69	6.50	\$375.00	\$2,437.50
12/04/2020	Jed Koslow	Staff Attorney		69	4.75	\$400.00	\$1,900.00
12/04/2020	Justin Ratliff	Staff Attorney		69	6.00	\$350.00	\$2,100.00
12/04/2020	Lauren Cormier	Staff Attorney		69	1.75	\$375.00	\$656.25
12/04/2020	Lawrence Hosmer	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
12/04/2020	Monique Hardial	Staff Attorney		69	8.00	\$375.00	\$3,000.00
12/04/2020	Ryan Candee	Senior Staff Attorneys		69	5.50	\$425.00	\$2,337.50
12/04/2020	Lawrence Hosmer	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
12/04/2020	William Pham	Staff Attorney		69	2.50	\$375.00	\$937.50
12/05/2020	Addison F. Golladay	Staff Attorney		69	5.00	\$400.00	\$2,000.00
12/05/2020	Esinam Quarco	Staff Attorney		69	3.75	\$400.00	\$1,500.00
12/05/2020	Justin Ratliff	Staff Attorney		69	6.00	\$350.00	\$2,100.00
12/06/2020	Addison F. Golladay	Staff Attorney		69	2.00	\$400.00	\$800.00
12/06/2020	Esinam Quarco	Staff Attorney		69	4.00	\$400.00	\$1,600.00
12/06/2020	Igor Faynshteyn	Staff Attorney		69	2.00	\$375.00	\$750.00
12/06/2020	Justin Ratliff	Staff Attorney		69	6.00	\$350.00	\$2,100.00
12/07/2020	Andrew Boruch	Senior Staff Attorneys		69	8.50	\$425.00	\$3,612.50
12/07/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/07/2020	Daniel Renehan	Staff Attorney		69	9.50	\$400.00	\$3,800.00
12/07/2020	Erick Ladson	Staff Attorney		69	8.00	\$400.00	\$3,200.00
12/07/2020	Esinam Quarco	Staff Attorney		69	4.00	\$400.00	\$1,600.00
12/07/2020	Ibrahim Hamed	Staff Attorney		69	11.00	\$400.00	\$4,400.00
12/07/2020	Igor Faynshteyn	Staff Attorney		69	9.00	\$375.00	\$3,375.00
12/07/2020	Jed Koslow	Staff Attorney		69	10.25	\$400.00	\$4,100.00
12/07/2020	Justin Ratliff	Staff Attorney		69	4.25	\$350.00	\$1,487.50
12/07/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00

12/07/2020	Lawrence Hosmer	Senior Staff Attorneys		69	10.50	\$425.00	\$4,462.50
12/07/2020	Monique Hardial	Staff Attorney		69	8.50	\$375.00	\$3,187.50
12/07/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
12/07/2020	Ryan Candee	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
12/07/2020	Stephen Imundo	Senior Staff Attorneys		69	6.75	\$425.00	\$2,868.75
12/07/2020	William Pham	Staff Attorney		69	4.50	\$375.00	\$1,687.50
12/07/2020	Ryan Candee	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
12/07/2020	William Pham	Staff Attorney		69	4.50	\$375.00	\$1,687.50
12/08/2020	Andrew Boruch	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
12/08/2020	Andrew Boruch	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
12/08/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/08/2020	Daniel Renehan	Staff Attorney		69	9.25	\$400.00	\$3,700.00
12/08/2020	Daniel Renehan	Staff Attorney		69	0.75	\$400.00	\$300.00
12/08/2020	Erick Ladson	Staff Attorney		69	7.50	\$400.00	\$3,000.00
12/08/2020	Esinam Quarco	Staff Attorney		69	4.00	\$400.00	\$1,600.00
12/08/2020	Ibrahim Hamed	Staff Attorney		69	11.00	\$400.00	\$4,400.00
12/08/2020	Igor Faynshteyn	Staff Attorney		69	10.00	\$375.00	\$3,750.00
12/08/2020	Esinam Quarco	Staff Attorney		69	3.75	\$400.00	\$1,500.00
12/08/2020	Jed Koslow	Staff Attorney		69	9.25	\$400.00	\$3,700.00
12/08/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
12/08/2020	Lawrence Hosmer	Senior Staff Attorneys		69	7.75	\$425.00	\$3,293.75
12/08/2020	Monique Hardial	Staff Attorney		69	9.50	\$375.00	\$3,562.50
12/08/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
12/08/2020	Ryan Candee	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
12/08/2020	William Pham	Staff Attorney		69	4.50	\$375.00	\$1,687.50
12/08/2020	Ryan Candee	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
12/08/2020	William Pham	Staff Attorney		69	4.50	\$375.00	\$1,687.50
12/09/2020	Andrew Boruch	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
12/09/2020	Andrew Boruch	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
12/09/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/09/2020	Daniel Renehan	Staff Attorney		69	7.00	\$400.00	\$2,800.00
12/09/2020	Erick Ladson	Staff Attorney		69	9.00	\$400.00	\$3,600.00

12/09/2020	Ibrahim Hamed	Staff Attorney		69	9.25	\$400.00	\$3,700.00
12/09/2020	Igor Faynshteyn	Staff Attorney		69	8.50	\$375.00	\$3,187.50
12/09/2020	Jed Koslow	Staff Attorney		69	8.25	\$400.00	\$3,300.00
12/09/2020	Justin Ratliff	Staff Attorney		69	7.00	\$350.00	\$2,450.00
12/09/2020	Lauren Cormier	Staff Attorney		69	8.75	\$375.00	\$3,281.25
12/09/2020	Lawrence Hosmer	Senior Staff Attorneys		69	8.50	\$425.00	\$3,612.50
12/09/2020	Monique Hardial	Staff Attorney		69	9.50	\$375.00	\$3,562.50
12/09/2020	Ryan Candee	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
12/09/2020	William Pham	Staff Attorney		69	4.50	\$375.00	\$1,687.50
12/09/2020	Ryan Candee	Senior Staff Attorneys		69	4.25	\$425.00	\$1,806.25
12/09/2020	William Pham	Staff Attorney		69	4.50	\$375.00	\$1,687.50
12/10/2020	Andrew Boruch	Senior Staff Attorneys		69	3.75	\$425.00	\$1,593.75
12/10/2020	Andrew Boruch	Senior Staff Attorneys		69	4.75	\$425.00	\$2,018.75
12/10/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/10/2020	Daniel Renehan	Staff Attorney		69	4.00	\$400.00	\$1,600.00
12/10/2020	Daniel Renehan	Staff Attorney		69	5.50	\$400.00	\$2,200.00
12/10/2020	Erick Ladson	Staff Attorney		69	4.00	\$400.00	\$1,600.00
12/10/2020	Erick Ladson	Staff Attorney		69	4.50	\$400.00	\$1,800.00
12/10/2020	Esinam Quarco	Staff Attorney		69	8.75	\$400.00	\$3,500.00
12/10/2020	Ibrahim Hamed	Staff Attorney		69	8.75	\$400.00	\$3,500.00
12/10/2020	Igor Faynshteyn	Staff Attorney		69	12.50	\$375.00	\$4,687.50
12/10/2020	Jed Koslow	Staff Attorney		69	7.50	\$400.00	\$3,000.00
12/10/2020	Justin Ratliff	Staff Attorney		69	4.00	\$350.00	\$1,400.00
12/10/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
12/10/2020	Lawrence Hosmer	Senior Staff Attorneys		69	6.00	\$425.00	\$2,550.00
12/10/2020	Monique Hardial	Staff Attorney		69	9.00	\$375.00	\$3,375.00
12/10/2020	Preya Rodriguez	Paralegal		69	0.25	\$325.00	\$81.25
12/10/2020	William Pham	Staff Attorney		69	4.50	\$375.00	\$1,687.50
12/10/2020	William Pham	Staff Attorney		69	4.50	\$375.00	\$1,687.50
12/11/2020	Andrew Boruch	Senior Staff Attorneys		69	3.00	\$425.00	\$1,275.00
12/11/2020	Andrew Boruch	Senior Staff Attorneys		69	3.25	\$425.00	\$1,381.25
12/11/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/11/2020	Daniel Renehan	Staff Attorney		69	4.00	\$400.00	\$1,600.00
12/11/2020	Erick Ladson	Staff Attorney		69	3.75	\$400.00	\$1,500.00
12/11/2020	Erick Ladson	Staff Attorney		69	3.25	\$400.00	\$1,300.00

12/11/2020	Jed Koslow	Staff Attorney		69	4.75	\$400.00	\$1,900.00
12/11/2020	Justin Ratliff	Staff Attorney		69	8.75	\$350.00	\$3,062.50
12/11/2020	Lauren Cormier	Staff Attorney		69	7.25	\$375.00	\$2,718.75
12/11/2020	Lawrence Hosmer	Senior Staff Attorneys		69	7.25	\$425.00	\$3,081.25
12/11/2020	Monique Hardial	Staff Attorney		69	3.50	\$375.00	\$1,312.50
12/11/2020	Ryan Candee	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
12/11/2020	William Pham	Staff Attorney		69	2.00	\$375.00	\$750.00
12/11/2020	William Pham	Staff Attorney		69	2.00	\$375.00	\$750.00
12/12/2020	Justin Ratliff	Staff Attorney		69	3.50	\$350.00	\$1,225.00
12/13/2020	Esinam Quarco	Staff Attorney		69	3.50	\$400.00	\$1,400.00
12/13/2020	Justin Ratliff	Staff Attorney		69	8.00	\$350.00	\$2,800.00
12/14/2020	Andrew Boruch	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
12/14/2020	Andrew Boruch	Senior Staff Attorneys		69	3.75	\$425.00	\$1,593.75
12/14/2020	Brian Chau	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
12/14/2020	Daniel Renehan	Staff Attorney		69	9.50	\$400.00	\$3,800.00
12/14/2020	Erick Ladson	Staff Attorney		69	8.00	\$400.00	\$3,200.00
12/14/2020	Esinam Quarco	Staff Attorney		69	6.50	\$400.00	\$2,600.00
12/14/2020	Ibrahim Hamed	Staff Attorney		69	11.00	\$400.00	\$4,400.00
12/14/2020	Jed Koslow	Staff Attorney		69	10.50	\$400.00	\$4,200.00
12/14/2020	Justin Ratliff	Staff Attorney		69	4.00	\$350.00	\$1,400.00
12/14/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
12/14/2020	Lawrence Hosmer	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
12/14/2020	Monique Hardial	Staff Attorney		69	7.00	\$375.00	\$2,625.00
12/14/2020	Ryan Candee	Senior Staff Attorneys		69	3.75	\$425.00	\$1,593.75
12/14/2020	Stephen Imundo	Senior Staff Attorneys		69	3.50	\$425.00	\$1,487.50
12/14/2020	William Pham	Staff Attorney		69	10.00	\$375.00	\$3,750.00
12/15/2020	Andrew Boruch	Senior Staff Attorneys		69	6.25	\$425.00	\$2,656.25
12/15/2020	Andrew Boruch	Senior Staff Attorneys		69	2.00	\$425.00	\$850.00
12/15/2020	Brian Chau	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
12/15/2020	Daniel Renehan	Staff Attorney		69	4.00	\$400.00	\$1,600.00
12/15/2020	Daniel Renehan	Staff Attorney		69	4.50	\$400.00	\$1,800.00
12/15/2020	Erick Ladson	Staff Attorney		69	5.50	\$400.00	\$2,200.00

12/15/2020	Esinam Quarco	Staff Attorney		69	7.50	\$400.00	\$3,000.00
12/15/2020	Jed Koslow	Staff Attorney		69	9.50	\$400.00	\$3,800.00
12/15/2020	Justin Ratliff	Staff Attorney		69	1.25	\$350.00	\$437.50
12/15/2020	Lauren Cormier	Staff Attorney		69	8.25	\$375.00	\$3,093.75
12/15/2020	Lawrence Hosmer	Senior Staff Attorneys		69	10.50	\$425.00	\$4,462.50
12/15/2020	Monique Hardial	Staff Attorney		69	6.50	\$375.00	\$2,437.50
12/15/2020	Ryan Candee	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/15/2020	Stephen Imundo	Senior Staff Attorneys		69	2.75	\$425.00	\$1,168.75
12/15/2020	William Pham	Staff Attorney		69	10.00	\$375.00	\$3,750.00
12/16/2020	Andrew Boruch	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
12/16/2020	Andrew Boruch	Senior Staff Attorneys		69	3.75	\$425.00	\$1,593.75
12/16/2020	Brian Chau	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
12/16/2020	Daniel Renehan	Staff Attorney		69	9.50	\$400.00	\$3,800.00
12/16/2020	Esinam Quarco	Staff Attorney		69	11.00	\$400.00	\$4,400.00
12/16/2020	Ibrahim Hamed	Staff Attorney		69	10.25	\$400.00	\$4,100.00
12/16/2020	Ingvar Olsson	Staff Attorney		69	8.50	\$400.00	\$3,400.00
12/16/2020	Jed Koslow	Staff Attorney		69	9.75	\$400.00	\$3,900.00
12/16/2020	Justin Ratliff	Staff Attorney		69	8.50	\$350.00	\$2,975.00
12/16/2020	Lauren Cormier	Staff Attorney		69	8.25	\$375.00	\$3,093.75
12/16/2020	Lawrence Hosmer	Senior Staff Attorneys		69	8.75	\$425.00	\$3,718.75
12/16/2020	Ryan Candee	Senior Staff Attorneys		69	10.50	\$425.00	\$4,462.50
12/16/2020	Stephen Imundo	Senior Staff Attorneys		69	3.00	\$425.00	\$1,275.00
12/16/2020	William Pham	Staff Attorney		69	10.00	\$375.00	\$3,750.00
12/17/2020	Andrew Boruch	Senior Staff Attorneys		69	3.25	\$425.00	\$1,381.25
12/17/2020	Andrew Boruch	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
12/17/2020	Brian Chau	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
12/17/2020	Daniel Renehan	Staff Attorney		69	4.00	\$400.00	\$1,600.00
12/17/2020	Ibrahim Hamed	Staff Attorney		69	7.75	\$400.00	\$3,100.00
12/17/2020	Ingvar Olsson	Staff Attorney		69	9.50	\$400.00	\$3,800.00
12/17/2020	Jed Koslow	Staff Attorney		69	6.00	\$400.00	\$2,400.00
12/17/2020	Justin Ratliff	Staff Attorney		69	12.50	\$350.00	\$4,375.00
12/17/2020	Lauren Cormier	Staff Attorney		69	8.50	\$375.00	\$3,187.50
12/17/2020	Lawrence Hosmer	Senior Staff Attorneys		69	8.75	\$425.00	\$3,718.75

12/17/2020	Stephen Imundo	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
12/17/2020	Stephen Imundo	Senior Staff Attorneys		69	2.00	\$425.00	\$850.00
12/17/2020	William Pham	Staff Attorney		69	10.00	\$375.00	\$3,750.00
12/18/2020	Addison F. Golladay	Staff Attorney		69	3.25	\$400.00	\$1,300.00
12/18/2020	Andrew Boruch	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
12/18/2020	Andrew Boruch	Senior Staff Attorneys		69	3.50	\$425.00	\$1,487.50
12/18/2020	Daniel Renehan	Staff Attorney		69	3.00	\$400.00	\$1,200.00
12/18/2020	Ingvar Olsson	Staff Attorney		69	16.00	\$400.00	\$6,400.00
12/18/2020	Jed Koslow	Staff Attorney		69	4.25	\$400.00	\$1,700.00
12/18/2020	Justin Ratliff	Staff Attorney		69	2.75	\$350.00	\$962.50
12/18/2020	Lauren Cormier	Staff Attorney		69	6.00	\$375.00	\$2,250.00
12/18/2020	Lawrence Hosmer	Senior Staff Attorneys		69	7.00	\$425.00	\$2,975.00
12/18/2020	Ryan Candee	Senior Staff Attorneys		69	7.75	\$425.00	\$3,293.75
12/18/2020	Stephen Imundo	Senior Staff Attorneys		69	1.00	\$425.00	\$425.00
12/20/2020	Addison F. Golladay	Staff Attorney		69	4.00	\$400.00	\$1,600.00
12/20/2020	Lauren Cormier	Staff Attorney		69	1.00	\$375.00	\$375.00
12/20/2020	Ryan Candee	Senior Staff Attorneys		69	1.00	\$425.00	\$425.00
12/21/2020	Addison F. Golladay	Staff Attorney		69	8.00	\$400.00	\$3,200.00
12/21/2020	Andrew Boruch	Senior Staff Attorneys		69	6.50	\$425.00	\$2,762.50
12/21/2020	Andrew Boruch	Senior Staff Attorneys		69	2.25	\$425.00	\$956.25
12/21/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/21/2020	Helen Fikrey	Staff Attorney		69	12.50	\$400.00	\$5,000.00
12/21/2020	Jed Koslow	Staff Attorney		69	12.25	\$400.00	\$4,900.00
12/21/2020	Lauren Cormier	Staff Attorney		69	10.00	\$375.00	\$3,750.00
12/21/2020	Ryan Candee	Senior Staff Attorneys		69	14.50	\$425.00	\$6,162.50
12/21/2020	Stephen Imundo	Senior Staff Attorneys		69	7.50	\$425.00	\$3,187.50
12/21/2020	Stephen Imundo	Senior Staff Attorneys		69	3.75	\$425.00	\$1,593.75
12/22/2020	Addison F. Golladay	Staff Attorney		69	9.50	\$400.00	\$3,800.00
12/22/2020	Andrew Boruch	Senior Staff Attorneys		69	7.00	\$425.00	\$2,975.00
12/22/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/22/2020	Jed Koslow	Staff Attorney		69	17.25	\$400.00	\$6,900.00
12/22/2020	Lauren Cormier	Staff Attorney		69	17.50	\$375.00	\$6,562.50
12/22/2020	Ryan Candee	Senior Staff Attorneys		69	14.50	\$425.00	\$6,162.50
12/22/2020	Stephen Imundo	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
12/23/2020	Addison F. Golladay	Staff Attorney		69	10.50	\$400.00	\$4,200.00

12/23/2020	Andrew Boruch	Senior Staff Attorneys		69	8.25	\$425.00	\$3,506.25
12/23/2020	Andrew Boruch	Senior Staff Attorneys		69	2.25	\$425.00	\$956.25
12/23/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/23/2020	Helen Fikrey	Staff Attorney		69	12.00	\$400.00	\$4,800.00
12/23/2020	Jed Koslow	Staff Attorney		69	5.75	\$400.00	\$2,300.00
12/23/2020	Lauren Cormier	Staff Attorney		69	4.50	\$375.00	\$1,687.50
12/23/2020	Ryan Candee	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
12/23/2020	Ryan Candee	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
12/24/2020	Addison F. Golladay	Staff Attorney		69	0.50	\$400.00	\$200.00
12/24/2020	Andrew Boruch	Senior Staff Attorneys		69	0.50	\$425.00	\$212.50
12/24/2020	Andrew Boruch	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
12/24/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/24/2020	Helen Fikrey	Staff Attorney		69	6.25	\$400.00	\$2,500.00
12/24/2020	Jed Koslow	Staff Attorney		69	4.75	\$400.00	\$1,900.00
12/24/2020	Andrew Boruch	Senior Staff Attorneys		69	2.50	\$425.00	\$1,062.50
12/24/2020	Lawrence Hosmer	Senior Staff Attorneys		69	0.50	\$425.00	\$212.50
12/26/2020	Addison F. Golladay	Staff Attorney		69	4.00	\$400.00	\$1,600.00
12/26/2020	Andrew Boruch	Senior Staff Attorneys		69	0.50	\$425.00	\$212.50
12/26/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
12/26/2020	Stephen Imundo	Senior Staff Attorneys		69	1.75	\$425.00	\$743.75
12/26/2020	Stephen Imundo	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
12/27/2020	Addison F. Golladay	Staff Attorney		69	7.50	\$400.00	\$3,000.00
12/27/2020	Andrew Boruch	Senior Staff Attorneys		69	5.75	\$425.00	\$2,443.75
12/27/2020	Helen Fikrey	Staff Attorney		69	9.25	\$400.00	\$3,700.00
12/27/2020	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
12/27/2020	Lawrence Hosmer	Senior Staff Attorneys		69	6.25	\$425.00	\$2,656.25
12/27/2020	Ryan Candee	Senior Staff Attorneys		69	6.00	\$425.00	\$2,550.00
12/28/2020	Addison F. Golladay	Staff Attorney		69	12.00	\$400.00	\$4,800.00
12/28/2020	Andrew Boruch	Senior Staff Attorneys		69	14.00	\$425.00	\$5,950.00
12/28/2020	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
12/28/2020	Helen Fikrey	Staff Attorney		69	12.50	\$400.00	\$5,000.00
12/28/2020	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
12/28/2020	Erick Ladson	Staff Attorney		69	4.25	\$400.00	\$1,700.00
12/28/2020	Lawrence Hosmer	Senior Staff Attorneys		69	10.75	\$425.00	\$4,568.75
12/28/2020	Ryan Candee	Senior Staff Attorneys		69	9.75	\$425.00	\$4,143.75
12/28/2020	Stephen Imundo	Senior Staff Attorneys		69	10.25	\$425.00	\$4,356.25
12/29/2020	Addison F. Golladay	Staff Attorney		69	14.00	\$400.00	\$5,600.00

12/29/2020	Andrew Boruch	Senior Staff Attorneys	69	14.50	\$425.00	\$6,162.50
12/29/2020	Brian Chau	Senior Staff Attorneys	69	10.00	\$425.00	\$4,250.00
12/29/2020	Erick Ladson	Staff Attorney	69	11.50	\$400.00	\$4,600.00
12/29/2020	Helen Fikrey	Staff Attorney	69	7.50	\$400.00	\$3,000.00
12/29/2020	Lauren Cormier	Staff Attorney	69	8.00	\$375.00	\$3,000.00
12/29/2020	Lawrence Hosmer	Senior Staff Attorneys	69	10.25	\$425.00	\$4,356.25
12/29/2020	Ryan Candee	Senior Staff Attorneys	69	12.25	\$425.00	\$5,206.25
12/29/2020	Stephen Imundo	Senior Staff Attorneys	69	4.50	\$425.00	\$1,912.50
12/29/2020	Stephen Imundo	Senior Staff Attorneys	69	4.00	\$425.00	\$1,700.00
12/30/2020	Addison F. Golladay	Staff Attorney	69	14.00	\$400.00	\$5,600.00
12/30/2020	Andrew Boruch	Senior Staff Attorneys	69	8.75	\$425.00	\$3,718.75
12/30/2020	Brian Chau	Senior Staff Attorneys	69	10.00	\$425.00	\$4,250.00
12/30/2020	Erick Ladson	Staff Attorney	69	6.00	\$400.00	\$2,400.00
12/30/2020	Erick Ladson	Staff Attorney	69	5.50	\$400.00	\$2,200.00
12/30/2020	Lauren Cormier	Staff Attorney	69	8.00	\$375.00	\$3,000.00
12/30/2020	Lawrence Hosmer	Senior Staff Attorneys	69	8.25	\$425.00	\$3,506.25
12/30/2020	Ryan Candee	Senior Staff Attorneys	69	10.25	\$425.00	\$4,356.25
12/30/2020	Stephen Imundo	Senior Staff Attorneys	69	2.00	\$425.00	\$850.00
12/31/2020	Andrew Boruch	Senior Staff Attorneys	69	2.75	\$425.00	\$1,168.75
12/31/2020	Brian Chau	Senior Staff Attorneys	69	10.00	\$425.00	\$4,250.00
12/31/2020	Erick Ladson	Staff Attorney	69	9.00	\$400.00	\$3,600.00
12/31/2020	Lauren Cormier	Staff Attorney	69	6.00	\$375.00	\$2,250.00
12/31/2020	Lawrence Hosmer	Senior Staff Attorneys	69	8.50	\$425.00	\$3,612.50
12/31/2020	Ryan Candee	Senior Staff Attorneys	69	8.00	\$425.00	\$3,400.00
12/31/2020	Stephen Imundo	Senior Staff Attorneys	69	2.25	\$425.00	\$956.25
01/02/2021	Brian Chau	Senior Staff Attorneys	69	8.00	\$425.00	\$3,400.00
01/02/2021	Erick Ladson	Staff Attorney	69	5.50	\$400.00	\$2,200.00
01/02/2021	Lawrence Hosmer	Senior Staff Attorneys	69	5.00	\$425.00	\$2,125.00
01/02/2021	Ryan Candee	Senior Staff Attorneys	69	8.50	\$425.00	\$3,612.50
01/02/2021	Stephen Imundo	Senior Staff Attorneys	69	3.00	\$425.00	\$1,275.00
01/03/2021	Brian Chau	Senior Staff Attorneys	69	8.00	\$425.00	\$3,400.00
01/03/2021	Erick Ladson	Staff Attorney	69	13.50	\$400.00	\$5,400.00
01/03/2021	Lauren Cormier	Staff Attorney	69	8.00	\$375.00	\$3,000.00
01/03/2021	Lawrence Hosmer	Senior Staff Attorneys	69	7.25	\$425.00	\$3,081.25
01/03/2021	Ryan Candee	Senior Staff Attorneys	69	8.75	\$425.00	\$3,718.75
01/03/2021	Stephen Imundo	Senior Staff Attorneys	69	2.00	\$425.00	\$850.00
01/03/2021	Stephen Imundo	Senior Staff Attorneys	69	0.75	\$425.00	\$318.75
01/03/2021	Stephen Imundo	Senior Staff Attorneys	69	0.50	\$425.00	\$212.50
01/04/2021	Addison F. Golladay	Staff Attorney	69	8.00	\$400.00	\$3,200.00
01/04/2021	Andrew Boruch	Senior Staff Attorneys	69	9.25	\$425.00	\$3,931.25

01/04/2021	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
01/04/2021	Erick Ladson	Staff Attorney		69	11.00	\$400.00	\$4,400.00
01/04/2021	Jed Koslow	Staff Attorney		69	6.50	\$400.00	\$2,600.00
01/04/2021	Lauren Cormier	Staff Attorney		69	10.25	\$375.00	\$3,843.75
01/04/2021	Lawrence Hosmer	Senior Staff Attorneys		69	7.75	\$425.00	\$3,293.75
01/04/2021	Ryan Candee	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
01/05/2021	Addison F. Golladay	Staff Attorney		69	8.00	\$400.00	\$3,200.00
01/05/2021	Andrew Boruch	Senior Staff Attorneys		69	6.00	\$425.00	\$2,550.00
01/05/2021	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
01/05/2021	Erick Ladson	Staff Attorney		69	12.00	\$400.00	\$4,800.00
01/05/2021	Jed Koslow	Staff Attorney		69	9.75	\$400.00	\$3,900.00
01/05/2021	Lauren Cormier	Staff Attorney		69	9.75	\$375.00	\$3,656.25
01/05/2021	Lawrence Hosmer	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
01/05/2021	Ryan Candee	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
01/06/2021	Addison F. Golladay	Staff Attorney		69	5.50	\$400.00	\$2,200.00
01/06/2021	Andrew Boruch	Senior Staff Attorneys		69	3.00	\$425.00	\$1,275.00
01/06/2021	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
01/06/2021	Erick Ladson	Staff Attorney		69	8.00	\$400.00	\$3,200.00
01/06/2021	Jed Koslow	Staff Attorney		69	10.75	\$400.00	\$4,300.00
01/06/2021	Lauren Cormier	Staff Attorney		69	10.75	\$375.00	\$4,031.25
01/06/2021	Lawrence Hosmer	Senior Staff Attorneys		69	7.50	\$425.00	\$3,187.50
01/06/2021	Ryan Candee	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
01/06/2021	Ryan Candee	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
01/07/2021	Addison F. Golladay	Staff Attorney		69	6.75	\$400.00	\$2,700.00
01/07/2021	Andrew Boruch	Senior Staff Attorneys		69	8.50	\$425.00	\$3,612.50
01/07/2021	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
01/07/2021	Erick Ladson	Staff Attorney		69	2.00	\$400.00	\$800.00
01/07/2021	Erick Ladson	Staff Attorney		69	3.00	\$400.00	\$1,200.00
01/07/2021	Jed Koslow	Staff Attorney		69	2.50	\$400.00	\$1,000.00
01/07/2021	Jed Koslow	Staff Attorney		69	6.25	\$400.00	\$2,500.00
01/07/2021	Lauren Cormier	Staff Attorney		69	9.25	\$375.00	\$3,468.75
01/07/2021	Lawrence Hosmer	Senior Staff Attorneys		69	7.25	\$425.00	\$3,081.25
01/07/2021	Ryan Candee	Senior Staff Attorneys		69	7.75	\$425.00	\$3,293.75
01/07/2021	Ryan Candee	Senior Staff Attorneys		69	7.75	\$425.00	\$3,293.75
01/07/2021	Stephen Imundo	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00

01/08/2021	Addison F. Golladay	Staff Attorney		69	6.75	\$400.00	\$2,700.00
01/08/2021	Andrew Boruch	Senior Staff Attorneys		69	8.75	\$425.00	\$3,718.75
01/08/2021	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
01/08/2021	Erick Ladson	Staff Attorney		69	4.00	\$400.00	\$1,600.00
01/08/2021	Helen Fikrey	Staff Attorney		69	8.00	\$400.00	\$3,200.00
01/08/2021	Jed Koslow	Staff Attorney		69	4.25	\$400.00	\$1,700.00
01/08/2021	Lawrence Hosmer	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
01/08/2021	Lawrence Hosmer	Senior Staff Attorneys		69	5.25	\$425.00	\$2,231.25
01/08/2021	Ryan Candee	Senior Staff Attorneys		69	4.75	\$425.00	\$2,018.75
01/08/2021	Ryan Candee	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
01/09/2021	Brian Chau	Senior Staff Attorneys		69	6.00	\$425.00	\$2,550.00
01/09/2021	Helen Fikrey	Staff Attorney		69	4.25	\$400.00	\$1,700.00
01/09/2021	Lawrence Hosmer	Senior Staff Attorneys		69	3.75	\$425.00	\$1,593.75
01/09/2021	Lawrence Hosmer	Senior Staff Attorneys		69	3.75	\$425.00	\$1,593.75
01/09/2021	Stephen Imundo	Senior Staff Attorneys		69	9.50	\$425.00	\$4,037.50
01/10/2021	Addison F. Golladay	Staff Attorney		69	5.00	\$400.00	\$2,000.00
01/10/2021	Andrew Boruch	Senior Staff Attorneys		69	5.25	\$425.00	\$2,231.25
01/10/2021	Brian Chau	Senior Staff Attorneys		69	6.00	\$425.00	\$2,550.00
01/10/2021	Lawrence Hosmer	Senior Staff Attorneys		69	0.75	\$425.00	\$318.75
01/10/2021	Ryan Candee	Senior Staff Attorneys		69	8.25	\$425.00	\$3,506.25
01/10/2021	Stephen Imundo	Senior Staff Attorneys		69	9.50	\$425.00	\$4,037.50
01/11/2021	Andrew Boruch	Senior Staff Attorneys		69	8.75	\$425.00	\$3,718.75
01/11/2021	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
01/11/2021	Erick Ladson	Staff Attorney		69	9.00	\$400.00	\$3,600.00
01/11/2021	Helen Fikrey	Staff Attorney		69	7.00	\$400.00	\$2,800.00
01/11/2021	Jed Koslow	Staff Attorney		69	8.75	\$400.00	\$3,500.00
01/11/2021	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
01/11/2021	Lawrence Hosmer	Senior Staff Attorneys		69	3.50	\$425.00	\$1,487.50
01/11/2021	Ryan Candee	Senior Staff Attorneys		69	4.75	\$425.00	\$2,018.75
01/11/2021	Ryan Candee	Senior Staff Attorneys		69	4.75	\$425.00	\$2,018.75
01/11/2021	Stephen Imundo	Senior Staff Attorneys		69	3.25	\$425.00	\$1,381.25
01/12/2021	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
01/12/2021	Erick Ladson	Staff Attorney		69	9.00	\$400.00	\$3,600.00

01/12/2021	Helen Fikrey	Staff Attorney		69	4.75	\$400.00	\$1,900.00
01/12/2021	Lauren Cormier	Staff Attorney		69	4.50	\$375.00	\$1,687.50
01/12/2021	Lauren Cormier	Staff Attorney		69	4.50	\$375.00	\$1,687.50
01/12/2021	Lawrence Hosmer	Senior Staff Attorneys		69	10.50	\$425.00	\$4,462.50
01/12/2021	Ryan Candee	Senior Staff Attorneys		69	4.75	\$425.00	\$2,018.75
01/12/2021	Ryan Candee	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
01/12/2021	Stephen Imundo	Senior Staff Attorneys		69	6.00	\$425.00	\$2,550.00
01/13/2021	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
01/13/2021	Erick Ladson	Staff Attorney		69	9.50	\$400.00	\$3,800.00
01/13/2021	Helen Fikrey	Staff Attorney		69	5.75	\$400.00	\$2,300.00
01/13/2021	Lauren Cormier	Staff Attorney		69	10.00	\$375.00	\$3,750.00
01/13/2021	Lawrence Hosmer	Senior Staff Attorneys		69	6.50	\$425.00	\$2,762.50
01/13/2021	Lawrence Hosmer	Senior Staff Attorneys		69	6.50	\$425.00	\$2,762.50
01/13/2021	Ryan Candee	Senior Staff Attorneys		69	4.75	\$425.00	\$2,018.75
01/13/2021	Ryan Candee	Senior Staff Attorneys		69	4.75	\$425.00	\$2,018.75
01/14/2021	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
01/14/2021	Erick Ladson	Staff Attorney		69	8.50	\$400.00	\$3,400.00
01/14/2021	Helen Fikrey	Staff Attorney		69	12.75	\$400.00	\$5,100.00
01/14/2021	Lauren Cormier	Staff Attorney		69	10.00	\$375.00	\$3,750.00
01/14/2021	Lawrence Hosmer	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
01/14/2021	Lawrence Hosmer	Senior Staff Attorneys		69	3.75	\$425.00	\$1,593.75
01/14/2021	Ryan Candee	Senior Staff Attorneys		69	6.75	\$425.00	\$2,868.75
01/14/2021	Stephen Imundo	Senior Staff Attorneys		69	4.75	\$425.00	\$2,018.75
01/15/2021	Addison F. Golladay	Staff Attorney		69	6.75	\$400.00	\$2,700.00
01/15/2021	Andrew Boruch	Senior Staff Attorneys		69	3.00	\$425.00	\$1,275.00
01/15/2021	Andrew Boruch	Senior Staff Attorneys		69	4.75	\$425.00	\$2,018.75
01/15/2021	Brian Chau	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
01/15/2021	Erick Ladson	Staff Attorney		69	4.00	\$400.00	\$1,600.00
01/15/2021	Helen Fikrey	Staff Attorney		69	4.00	\$400.00	\$1,600.00
01/15/2021	Lauren Cormier	Staff Attorney		69	3.00	\$375.00	\$1,125.00
01/15/2021	Lawrence Hosmer	Senior Staff Attorneys		69	3.50	\$425.00	\$1,487.50
01/15/2021	Lawrence Hosmer	Senior Staff Attorneys		69	3.50	\$425.00	\$1,487.50
01/15/2021	Stephen Imundo	Senior Staff Attorneys		69	2.75	\$425.00	\$1,168.75
01/15/2021	Stephen Imundo	Senior Staff Attorneys		69	2.75	\$425.00	\$1,168.75
01/16/2021	Addison F. Golladay	Staff Attorney		69	3.75	\$400.00	\$1,500.00
01/16/2021	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
01/16/2021	Lawrence Hosmer	Senior Staff Attorneys		69	0.25	\$425.00	\$106.25

01/17/2021	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
01/17/2021	Lawrence Hosmer	Senior Staff Attorneys		69	2.25	\$425.00	\$956.25
01/17/2021	Lawrence Hosmer	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
01/17/2021	Lawrence Hosmer	Senior Staff Attorneys		69	2.25	\$425.00	\$956.25
01/17/2021	Stephen Imundo	Senior Staff Attorneys		69	6.50	\$425.00	\$2,762.50
01/18/2021	Andrew Boruch	Senior Staff Attorneys		69	4.50	\$425.00	\$1,912.50
01/18/2021	Brian Chau	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
01/18/2021	Lawrence Hosmer	Senior Staff Attorneys		69	2.25	\$425.00	\$956.25
01/19/2021	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
01/19/2021	Lawrence Hosmer	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
01/20/2021	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
01/20/2021	Preya Rodriguez	Paralegal		69	5.00	\$325.00	\$1,625.00
01/21/2021	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
01/22/2021	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
01/23/2021	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
01/23/2021	Lawrence Hosmer	Senior Staff Attorneys		69	0.25	\$425.00	\$106.25
01/24/2021	Addison F. Golladay	Staff Attorney		69	4.00	\$400.00	\$1,600.00
01/24/2021	Andrew Boruch	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
01/24/2021	Brian Chau	Senior Staff Attorneys		69	3.00	\$425.00	\$1,275.00
01/24/2021	Lauren Cormier	Staff Attorney		69	4.00	\$375.00	\$1,500.00
01/24/2021	Lawrence Hosmer	Senior Staff Attorneys		69	6.25	\$425.00	\$2,656.25
01/24/2021	Stephen Imundo	Senior Staff Attorneys		69	9.25	\$425.00	\$3,931.25
01/25/2021	Andrew Boruch	Senior Staff Attorneys		69	6.50	\$425.00	\$2,762.50
01/25/2021	Brian Chau	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
01/25/2021	Lawrence Hosmer	Senior Staff Attorneys		69	10.00	\$425.00	\$4,250.00
01/25/2021	Stephen Imundo	Senior Staff Attorneys		69	3.00	\$425.00	\$1,275.00
01/26/2021	Helen Fikrey	Staff Attorney		69	9.50	\$400.00	\$3,800.00
01/26/2021	Jed Koslow	Staff Attorney		69	4.75	\$400.00	\$1,900.00
01/26/2021	Lauren Cormier	Staff Attorney		69	9.25	\$375.00	\$3,468.75
01/26/2021	Lawrence Hosmer	Senior Staff Attorneys		69	14.75	\$425.00	\$6,268.75
01/26/2021	Preya Rodriguez	Paralegal		69	3.00	\$325.00	\$975.00
01/26/2021	Ryan Candee	Senior Staff Attorneys		69	5.00	\$425.00	\$2,125.00
01/27/2021	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
01/27/2021	Erick Ladson	Staff Attorney		69	5.00	\$400.00	\$2,000.00
01/27/2021	Helen Fikrey	Staff Attorney		69	5.00	\$400.00	\$2,000.00

01/27/2021	Jed Koslow	Staff Attorney		69	3.50	\$400.00	\$1,400.00
01/27/2021	Lauren Cormier	Staff Attorney		69	7.25	\$375.00	\$2,718.75
01/27/2021	Lawrence Hosmer	Senior Staff Attorneys		69	11.25	\$425.00	\$4,781.25
01/27/2021	Preya Rodriguez	Paralegal		69	2.25	\$325.00	\$731.25
01/27/2021	Stephen Imundo	Senior Staff Attorneys		69	3.25	\$425.00	\$1,381.25
01/28/2021	Addison F. Golladay	Staff Attorney		69	11.00	\$400.00	\$4,400.00
01/28/2021	Andrew Boruch	Senior Staff Attorneys		69	9.00	\$425.00	\$3,825.00
01/28/2021	Brian Chau	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
01/28/2021	Erick Ladson	Staff Attorney		69	10.50	\$400.00	\$4,200.00
01/28/2021	Lauren Cormier	Staff Attorney		69	5.75	\$375.00	\$2,156.25
01/28/2021	Lawrence Hosmer	Senior Staff Attorneys		69	12.00	\$425.00	\$5,100.00
01/28/2021	Preya Rodriguez	Paralegal		69	7.50	\$325.00	\$2,437.50
01/28/2021	Ryan Candee	Senior Staff Attorneys		69	10.75	\$425.00	\$4,568.75
01/28/2021	Stephen Imundo	Senior Staff Attorneys		69	5.25	\$425.00	\$2,231.25
01/29/2021	Addison F. Golladay	Staff Attorney		69	6.50	\$400.00	\$2,600.00
01/29/2021	Andrew Boruch	Senior Staff Attorneys		69	8.25	\$425.00	\$3,506.25
01/29/2021	Brian Chau	Senior Staff Attorneys		69	8.00	\$425.00	\$3,400.00
01/29/2021	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
01/31/2021	Lauren Cormier	Staff Attorney		69	2.25	\$375.00	\$843.75
02/01/2021	Erick Ladson	Staff Attorney		69	4.00	\$400.00	\$1,600.00
02/02/2021	Erick Ladson	Staff Attorney		69	4.00	\$400.00	\$1,600.00
02/03/2021	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
02/04/2021	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
02/05/2021	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
02/08/2021	Lauren Cormier	Staff Attorney		69	7.50	\$375.00	\$2,812.50
02/09/2021	Lauren Cormier	Staff Attorney		69	8.50	\$375.00	\$3,187.50
02/11/2021	Lauren Cormier	Staff Attorney		69	8.00	\$375.00	\$3,000.00
02/11/2021	Stephen Imundo	Senior Staff Attorneys		69	4.00	\$425.00	\$1,700.00
02/18/2021	Lawrence Hosmer	Senior Staff Attorneys		69	2.75	\$425.00	\$1,168.75
02/19/2021	Lawrence Hosmer	Senior Staff Attorneys		69	2.75	\$425.00	\$1,168.75
02/20/2021	Lawrence Hosmer	Senior Staff Attorneys		69	1.00	\$425.00	\$425.00
02/21/2021	Lawrence Hosmer	Senior Staff Attorneys		69	2.00	\$425.00	\$850.00
02/23/2021	Lawrence Hosmer	Senior Staff Attorneys		69	7.75	\$425.00	\$3,293.75
02/24/2021	Lawrence Hosmer	Senior Staff Attorneys		69	11.25	\$425.00	\$4,781.25
02/25/2021	Lawrence Hosmer	Senior Staff Attorneys		69	8.25	\$425.00	\$3,506.25
02/26/2021	Andrew Boruch	Senior Staff Attorneys		69	14.00	\$425.00	\$5,950.00
02/26/2021	Lawrence Hosmer	Senior Staff Attorneys		69	11.00	\$425.00	\$4,675.00
02/26/2021	Ryan Candee	Senior Staff Attorneys		69	5.25	\$425.00	\$2,231.25

02/27/2021	Andrew Boruch	Senior Staff Attorneys		69	8.50	\$425.00	\$3,612.50
02/27/2021	Lawrence Hosmer	Senior Staff Attorneys		69	3.75	\$425.00	\$1,593.75
03/01/2021	Lawrence Hosmer	Senior Staff Attorneys		69	10.25	\$425.00	\$4,356.25
03/01/2021	Ryan Candee	Senior Staff Attorneys		69	4.75	\$425.00	\$2,018.75
03/02/2021	Lawrence Hosmer	Senior Staff Attorneys		69	3.75	\$425.00	\$1,593.75
03/03/2021	Andrew Boruch	Senior Staff Attorneys		69	10.50	\$425.00	\$4,462.50
03/03/2021	Lawrence Hosmer	Senior Staff Attorneys		69	10.25	\$425.00	\$4,356.25
				TOTALS FOR PROJECT #69:		8,993.75	\$3,577,975.00

Project #70: Discovery (General). Lead Counsel spent 2,271.5 hours with a lodestar of \$1,204,875.00 on other general discovery matters, not including in one of the foregoing projects. This work, the details of which are broken down chronologically below, included preparing a protective order, assessing the discovery needed to prove Lead Plaintiff's claims, analyzing, discussing, and negotiating the scope of discovery, including time periods, custodians and search terms, general planning for depositions, general oversight and discovery strategy, management of discovery, reviewing key evidence obtained, and other work.

Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
09/23/2019	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
09/24/2019	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
10/03/2019	Rebecca Boon	Partner		70	2.50	\$875.00	\$2,187.50
10/03/2019	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
10/03/2019	Michelle Leung	Case Managers		70	1.25	\$350.00	\$437.50
10/08/2019	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
10/08/2019	Salvatore Graziano	Partner		70	1.00	\$1,150.00	\$1,150.00
10/08/2019	Jeremy Robinson	Partner		70	2.00	\$900.00	\$1,800.00
10/11/2019	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
10/14/2019	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
10/16/2019	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
10/23/2019	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
10/23/2019	Joelle Landino	Investigator		70	0.75	\$425.00	\$318.75
10/24/2019	Amy Bitkower	Director of Investigations		70	0.25	\$575.00	\$143.75
10/24/2019	Joelle Landino	Investigator		70	0.50	\$425.00	\$212.50
10/29/2019	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
10/29/2019	Joelle Landino	Investigator		70	3.75	\$425.00	\$1,593.75
10/30/2019	Joelle Landino	Investigator		70	0.75	\$425.00	\$318.75

11/08/2019	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
11/11/2019	Joelle Landino	Investigator		70	0.25	\$425.00	\$106.25
11/12/2019	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
11/13/2019	Salvatore Graziano	Partner		70	0.75	\$1,150.00	\$862.50
11/15/2019	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
11/20/2019	Rebecca Boon	Partner		70	4.50	\$875.00	\$3,937.50
11/22/2019	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
11/23/2019	Rebecca Boon	Partner		70	0.50	\$875.00	\$437.50
11/25/2019	Rebecca Boon	Partner		70	1.75	\$875.00	\$1,531.25
11/27/2019	Rebecca Boon	Partner		70	5.00	\$875.00	\$4,375.00
11/27/2019	Jeremy Robinson	Partner		70	1.00	\$900.00	\$900.00
12/02/2019	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
12/03/2019	Jose Echegaray	Case Managers		70	3.00	\$350.00	\$1,050.00
12/06/2019	Rebecca Boon	Partner		70	1.50	\$875.00	\$1,312.50
12/06/2019	Joelle Landino	Investigator		70	0.50	\$425.00	\$212.50
12/09/2019	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
12/10/2019	Rebecca Boon	Partner		70	2.50	\$875.00	\$2,187.50
12/10/2019	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
12/10/2019	Jeremy Robinson	Partner		70	1.50	\$900.00	\$1,350.00
12/10/2019	Johanna Pitcairn	Litigation Support		70	2.50	\$400.00	\$1,000.00
12/12/2019	Rebecca Boon	Partner		70	3.50	\$875.00	\$3,062.50
12/13/2019	Rebecca Boon	Partner		70	4.00	\$875.00	\$3,500.00
12/16/2019	Ryan Dykhous	Associate		70	1.75	\$425.00	\$743.75
12/17/2019	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
12/19/2019	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
12/21/2019	Ryan Dykhous	Associate		70	0.75	\$425.00	\$318.75
12/31/2019	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
12/31/2019	Jeremy Robinson	Partner		70	3.00	\$900.00	\$2,700.00
01/03/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
01/14/2020	Rebecca Boon	Partner		70	3.50	\$875.00	\$3,062.50

01/14/2020	Michelle Leung	Case Managers		70	2.75	\$350.00	\$962.50
01/21/2020	Rebecca Boon	Partner		70	1.50	\$875.00	\$1,312.50
01/21/2020	Preya Rodriguez	Paralegal		70	5.00	\$325.00	\$1,625.00
01/22/2020	Rebecca Boon	Partner		70	2.50	\$875.00	\$2,187.50
01/22/2020	Ryan Dykhhouse	Associate		70	0.75	\$425.00	\$318.75
01/23/2020	Rebecca Boon	Partner		70	1.50	\$875.00	\$1,312.50
01/29/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
01/29/2020	Jose Echegaray	Case Managers		70	0.25	\$350.00	\$87.50
01/30/2020	Rebecca Boon	Partner		70	2.50	\$875.00	\$2,187.50
01/30/2020	Salvatore Graziano	Partner		70	0.75	\$1,150.00	\$862.50
02/03/2020	Rebecca Boon	Partner		70	1.50	\$875.00	\$1,312.50
02/04/2020	Ingvar Olsson	Staff Attorney		70	8.50	\$400.00	\$3,400.00
02/05/2020	Ingvar Olsson	Staff Attorney		70	8.50	\$400.00	\$3,400.00
02/06/2020	Rebecca Boon	Partner		70	4.50	\$875.00	\$3,937.50
02/06/2020	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
02/06/2020	Ingvar Olsson	Staff Attorney		70	7.00	\$400.00	\$2,800.00
02/06/2020	Stephen Imundo	Senior Staff Attorneys		70	8.50	\$425.00	\$3,612.50
02/07/2020	Jeremy Robinson	Partner		70	4.00	\$900.00	\$3,600.00
02/07/2020	Ingvar Olsson	Staff Attorney		70	8.00	\$400.00	\$3,200.00
02/07/2020	Stephen Imundo	Senior Staff Attorneys		70	8.25	\$425.00	\$3,506.25
02/08/2020	Jeremy Robinson	Partner		70	6.00	\$900.00	\$5,400.00
02/08/2020	Stephen Imundo	Senior Staff Attorneys		70	7.00	\$425.00	\$2,975.00
02/09/2020	Jeremy Robinson	Partner		70	6.00	\$900.00	\$5,400.00
02/10/2020	Jeremy Robinson	Partner		70	9.50	\$900.00	\$8,550.00
02/10/2020	Ingvar Olsson	Staff Attorney		70	5.25	\$400.00	\$2,100.00
02/10/2020	Stephen Imundo	Senior Staff Attorneys		70	8.00	\$425.00	\$3,400.00
02/11/2020	Ingvar Olsson	Staff Attorney		70	9.25	\$400.00	\$3,700.00
02/11/2020	Joelle Landino	Investigator		70	0.25	\$425.00	\$106.25

02/11/2020	Johanna Pitcairn	Litigation Support		70	1.50	\$400.00	\$600.00
02/11/2020	Stephen Imundo	Senior Staff Attorneys		70	7.75	\$425.00	\$3,293.75
02/12/2020	Ingvar Olsson	Staff Attorney		70	9.00	\$400.00	\$3,600.00
02/12/2020	Ryan Dykhous	Associate		70	1.50	\$425.00	\$637.50
02/12/2020	Stephen Imundo	Senior Staff Attorneys		70	8.00	\$425.00	\$3,400.00
02/13/2020	Ingvar Olsson	Staff Attorney		70	8.50	\$400.00	\$3,400.00
02/13/2020	Stephen Imundo	Senior Staff Attorneys		70	8.25	\$425.00	\$3,506.25
02/14/2020	Ingvar Olsson	Staff Attorney		70	8.00	\$400.00	\$3,200.00
02/14/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50
02/14/2020	Stephen Imundo	Senior Staff Attorneys		70	5.75	\$425.00	\$2,443.75
02/18/2020	Ingvar Olsson	Staff Attorney		70	7.50	\$400.00	\$3,000.00
02/21/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
02/21/2020	Ingvar Olsson	Staff Attorney		70	8.00	\$400.00	\$3,200.00
02/24/2020	Amy Bitkower	Director of Investigations		70	0.50	\$575.00	\$287.50
02/25/2020	Jeremy Robinson	Partner		70	5.00	\$900.00	\$4,500.00
02/26/2020	Jeremy Robinson	Partner		70	5.00	\$900.00	\$4,500.00
02/27/2020	Jeremy Robinson	Partner		70	4.00	\$900.00	\$3,600.00
02/28/2020	Jeremy Robinson	Partner		70	4.00	\$900.00	\$3,600.00
03/04/2020	Ryan Dykhous	Associate		70	1.25	\$425.00	\$531.25

03/10/2020	Jose Echegaray	Case Managers		70	1.25	\$350.00	\$437.50
03/11/2020	Jose Echegaray	Case Managers		70	0.25	\$350.00	\$87.50
03/12/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
03/17/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
03/19/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
03/19/2020	William Pham	Staff Attorney		70	8.00	\$375.00	\$3,000.00
03/23/2020	Jeremy Robinson	Partner		70	3.00	\$900.00	\$2,700.00
03/23/2020	Stephen Imundo	Senior Staff Attorneys		70	9.50	\$425.00	\$4,037.50
03/24/2020	Jeremy Robinson	Partner		70	8.50	\$900.00	\$7,650.00
03/24/2020	Ryan Dykhous	Associate		70	1.00	\$425.00	\$425.00
03/24/2020	William Pham	Staff Attorney		70	8.00	\$375.00	\$3,000.00
03/25/2020	Jeremy Robinson	Partner		70	9.50	\$900.00	\$8,550.00
03/26/2020	William Pham	Staff Attorney		70	5.25	\$375.00	\$1,968.75
03/30/2020	Jeremy Robinson	Partner		70	8.50	\$900.00	\$7,650.00
03/31/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
03/31/2020	Jeremy Robinson	Partner		70	8.50	\$900.00	\$7,650.00
03/31/2020	William Pham	Staff Attorney		70	8.75	\$375.00	\$3,281.25
04/01/2020	Jeremy Robinson	Partner		70	5.00	\$900.00	\$4,500.00
04/01/2020	Ryan Dykhous	Associate		70	1.75	\$425.00	\$743.75
04/02/2020	Jeremy Robinson	Partner		70	6.00	\$900.00	\$5,400.00
04/06/2020	Salvatore Graziano	Partner		70	0.75	\$1,150.00	\$862.50
04/06/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50
04/07/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
04/07/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50
04/08/2020	Rebecca Boon	Partner		70	1.50	\$875.00	\$1,312.50
04/09/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00

04/09/2020	Jeremy Robinson	Partner		70	8.50	\$900.00	\$7,650.00
04/09/2020	Ryan Dykhous	Associate		70	1.00	\$425.00	\$425.00
04/09/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50
04/10/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50
04/10/2020	Jeremy Robinson	Partner		70	7.00	\$900.00	\$6,300.00
04/13/2020	Rebecca Boon	Partner		70	2.50	\$875.00	\$2,187.50
04/13/2020	Ryan Dykhous	Associate		70	0.75	\$425.00	\$318.75
04/13/2020	William Pham	Staff Attorney		70	9.00	\$375.00	\$3,375.00
04/14/2020	Jeremy Robinson	Partner		70	5.50	\$900.00	\$4,950.00
04/16/2020	Jeremy Robinson	Partner		70	5.50	\$900.00	\$4,950.00
04/17/2020	Jeremy Robinson	Partner		70	5.50	\$900.00	\$4,950.00
04/21/2020	Jeremy Robinson	Partner		70	4.50	\$900.00	\$4,050.00
04/22/2020	Jeremy Robinson	Partner		70	2.50	\$900.00	\$2,250.00
04/23/2020	Jeremy Robinson	Partner		70	2.50	\$900.00	\$2,250.00
04/24/2020	Jeremy Robinson	Partner		70	2.50	\$900.00	\$2,250.00
04/27/2020	Jeremy Robinson	Partner		70	2.50	\$900.00	\$2,250.00
04/28/2020	Jeremy Robinson	Partner		70	6.50	\$900.00	\$5,850.00
04/28/2020	Ryan Dykhous	Associate		70	3.00	\$425.00	\$1,275.00
04/29/2020	Ryan Dykhous	Associate		70	2.00	\$425.00	\$850.00
04/29/2020	Stephen Imundo	Senior Staff Attorneys		70	1.75	\$425.00	\$743.75
04/30/2020	Jeremy Robinson	Partner		70	1.50	\$900.00	\$1,350.00
04/30/2020	Addison F. Golladay	Staff Attorney		70	8.00	\$400.00	\$3,200.00
05/01/2020	Jeremy Robinson	Partner		70	5.50	\$900.00	\$4,950.00

05/01/2020	Addison F. Golladay	Staff Attorney		70	8.00	\$400.00	\$3,200.00
05/01/2020	Stephen Imundo	Senior Staff Attorneys		70	4.50	\$425.00	\$1,912.50
05/04/2020	Jeremy Robinson	Partner		70	2.00	\$900.00	\$1,800.00
05/04/2020	Brian Chau	Senior Staff Attorneys		70	8.00	\$425.00	\$3,400.00
05/04/2020	Ryan Dykhous	Associate		70	1.25	\$425.00	\$531.25
05/04/2020	Stephen Imundo	Senior Staff Attorneys		70	12.75	\$425.00	\$5,418.75
05/05/2020	Jeremy Robinson	Partner		70	6.00	\$900.00	\$5,400.00
05/05/2020	Brian Chau	Senior Staff Attorneys		70	8.00	\$425.00	\$3,400.00
05/05/2020	Igor Faynshteyn	Staff Attorney		70	8.50	\$375.00	\$3,187.50
05/05/2020	Stephen Imundo	Senior Staff Attorneys		70	9.75	\$425.00	\$4,143.75
05/05/2020	Stephen Imundo	Senior Staff Attorneys		70	3.25	\$425.00	\$1,381.25
05/06/2020	Brian Chau	Senior Staff Attorneys		70	7.00	\$425.00	\$2,975.00
05/06/2020	Lauren Cormier	Staff Attorney		70	8.00	\$375.00	\$3,000.00
05/07/2020	Jeremy Robinson	Partner		70	5.50	\$900.00	\$4,950.00
05/07/2020	Ibrahim Hamed	Staff Attorney		70	8.00	\$400.00	\$3,200.00
05/07/2020	Monique Hardial	Staff Attorney		70	8.00	\$375.00	\$3,000.00
05/07/2020	Stephen Imundo	Senior Staff Attorneys		70	3.50	\$425.00	\$1,487.50
05/08/2020	Jeremy Robinson	Partner		70	2.50	\$900.00	\$2,250.00
05/08/2020	Monique Hardial	Staff Attorney		70	8.00	\$375.00	\$3,000.00
05/08/2020	Stephen Imundo	Senior Staff Attorneys		70	3.50	\$425.00	\$1,487.50
05/11/2020	Jeremy Robinson	Partner		70	2.00	\$900.00	\$1,800.00
05/11/2020	Stephen Imundo	Senior Staff Attorneys		70	10.75	\$425.00	\$4,568.75
05/12/2020	Jeremy Robinson	Partner		70	5.50	\$900.00	\$4,950.00
05/12/2020	Stephen Imundo	Senior Staff Attorneys		70	8.50	\$425.00	\$3,612.50
05/12/2020	Stephen Imundo	Senior Staff Attorneys		70	1.50	\$425.00	\$637.50
05/13/2020	Amy Bitkower	Director of Investigations		70	0.25	\$575.00	\$143.75
05/13/2020	Helen Fikrey	Staff Attorney		70	6.50	\$400.00	\$2,600.00

05/13/2020	Ryan Dykhhouse	Associate		70	1.50	\$425.00	\$637.50
05/13/2020	Stephen Imundo	Senior Staff Attorneys		70	7.25	\$425.00	\$3,081.25
05/14/2020	Rebecca Boon	Partner		70	1.50	\$875.00	\$1,312.50
05/14/2020	Ryan Dykhhouse	Associate		70	1.25	\$425.00	\$531.25
05/14/2020	Ryan Dykhhouse	Associate		70	1.00	\$425.00	\$425.00
05/15/2020	Jeremy Robinson	Partner		70	4.00	\$900.00	\$3,600.00
05/17/2020	Jeremy Robinson	Partner		70	2.50	\$900.00	\$2,250.00
05/18/2020	Addison F. Golladay	Staff Attorney		70	10.50	\$400.00	\$4,200.00
05/19/2020	Rebecca Boon	Partner		70	0.75	\$875.00	\$656.25
05/19/2020	Ryan Dykhhouse	Associate		70	1.25	\$425.00	\$531.25
05/21/2020	Rebecca Boon	Partner		70	1.50	\$875.00	\$1,312.50
05/22/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
05/22/2020	Ryan Dykhhouse	Associate		70	1.00	\$425.00	\$425.00
05/23/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
05/23/2020	Justin Ratliff	Staff Attorney		70	5.00	\$350.00	\$1,750.00
05/24/2020	Justin Ratliff	Staff Attorney		70	7.75	\$350.00	\$2,712.50
05/26/2020	Ibrahim Hamed	Staff Attorney		70	10.25	\$400.00	\$4,100.00
05/27/2020	Jeremy Robinson	Partner		70	3.75	\$900.00	\$3,375.00
05/28/2020	Jeremy Robinson	Partner		70	5.50	\$900.00	\$4,950.00
05/29/2020	Jeremy Robinson	Partner		70	3.50	\$900.00	\$3,150.00
06/01/2020	Jeremy Robinson	Partner		70	2.50	\$900.00	\$2,250.00
06/01/2020	Ryan Dykhhouse	Associate		70	2.50	\$425.00	\$1,062.50
06/02/2020	Jeremy Robinson	Partner		70	8.50	\$900.00	\$7,650.00
06/02/2020	Lauren Cormier	Staff Attorney		70	8.00	\$375.00	\$3,000.00
06/03/2020	Rebecca Boon	Partner		70	0.50	\$875.00	\$437.50
06/04/2020	Jeremy Robinson	Partner		70	1.00	\$900.00	\$900.00

06/04/2020	Stephen Imundo	Senior Staff Attorneys		70	9.25	\$425.00	\$3,931.25
06/05/2020	Jeremy Robinson	Partner		70	2.00	\$900.00	\$1,800.00
06/05/2020	Stephen Imundo	Senior Staff Attorneys		70	3.75	\$425.00	\$1,593.75
06/07/2020	Jeremy Robinson	Partner		70	3.00	\$900.00	\$2,700.00
06/08/2020	Jeremy Robinson	Partner		70	6.50	\$900.00	\$5,850.00
06/08/2020	Stephen Imundo	Senior Staff Attorneys		70	4.50	\$425.00	\$1,912.50
06/08/2020	Stephen Imundo	Senior Staff Attorneys		70	4.50	\$425.00	\$1,912.50
06/09/2020	Jeremy Robinson	Partner		70	4.50	\$900.00	\$4,050.00
06/09/2020	Stephen Imundo	Senior Staff Attorneys		70	4.50	\$425.00	\$1,912.50
06/10/2020	Rebecca Boon	Partner		70	0.75	\$875.00	\$656.25
06/10/2020	Jeremy Robinson	Partner		70	5.50	\$900.00	\$4,950.00
06/11/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
06/11/2020	Jeremy Robinson	Partner		70	7.50	\$900.00	\$6,750.00
06/11/2020	Lauren Cormier	Staff Attorney		70	8.00	\$375.00	\$3,000.00
06/12/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
06/12/2020	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
06/12/2020	Jeremy Robinson	Partner		70	4.50	\$900.00	\$4,050.00
06/14/2020	Jeremy Robinson	Partner		70	4.50	\$900.00	\$4,050.00
06/15/2020	Jeremy Robinson	Partner		70	7.50	\$900.00	\$6,750.00
06/16/2020	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
06/16/2020	Jeremy Robinson	Partner		70	7.50	\$900.00	\$6,750.00
06/16/2020	Johanna Pitcairn	Litigation Support		70	1.00	\$400.00	\$400.00
06/17/2020	Johanna Pitcairn	Litigation Support		70	3.00	\$400.00	\$1,200.00
06/18/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
06/18/2020	Salvatore Graziano	Partner		70	0.75	\$1,150.00	\$862.50

06/18/2020	Jeremy Robinson	Partner		70	8.50	\$900.00	\$7,650.00
06/19/2020	Salvatore Graziano	Partner		70	0.75	\$1,150.00	\$862.50
06/19/2020	Jeremy Robinson	Partner		70	5.50	\$900.00	\$4,950.00
06/19/2020	Johanna Pitcairn	Litigation Support		70	0.50	\$400.00	\$200.00
06/22/2020	Jeremy Robinson	Partner		70	4.50	\$900.00	\$4,050.00
06/23/2020	Jeremy Robinson	Partner		70	6.50	\$900.00	\$5,850.00
06/24/2020	Jeremy Robinson	Partner		70	3.50	\$900.00	\$3,150.00
06/25/2020	Jeremy Robinson	Partner		70	4.00	\$900.00	\$3,600.00
06/26/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
06/26/2020	Jeremy Robinson	Partner		70	5.50	\$900.00	\$4,950.00
06/28/2020	Jeremy Robinson	Partner		70	3.00	\$900.00	\$2,700.00
06/30/2020	Jeremy Robinson	Partner		70	3.00	\$900.00	\$2,700.00
06/30/2020	Johanna Pitcairn	Litigation Support		70	5.00	\$400.00	\$2,000.00
07/01/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
07/07/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50
07/08/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
07/08/2020	Jose Echegaray	Case Managers		70	0.50	\$350.00	\$175.00
07/10/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
07/15/2020	Rebecca Boon	Partner		70	0.50	\$875.00	\$437.50
07/15/2020	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
07/15/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50
07/16/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50
07/21/2020	Jeremy Robinson	Partner		70	8.00	\$900.00	\$7,200.00
07/21/2020	Jose Echegaray	Case Managers		70	0.50	\$350.00	\$175.00
07/21/2020	Jose Echegaray	Case Managers		70	0.75	\$350.00	\$262.50
07/21/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50
07/21/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50

07/21/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50
07/22/2020	Jeremy Robinson	Partner		70	5.50	\$900.00	\$4,950.00
07/28/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
07/28/2020	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
07/29/2020	Jose Echegaray	Case Managers		70	0.50	\$350.00	\$175.00
07/30/2020	Rebecca Boon	Partner		70	0.50	\$875.00	\$437.50
07/31/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
07/31/2020	Stephen Imundo	Senior Staff Attorneys		70	4.25	\$425.00	\$1,806.25
08/03/2020	Stephen Imundo	Senior Staff Attorneys		70	8.00	\$425.00	\$3,400.00
08/04/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
08/04/2020	Stephen Imundo	Senior Staff Attorneys		70	2.50	\$425.00	\$1,062.50
08/04/2020	Stephen Imundo	Senior Staff Attorneys		70	5.50	\$425.00	\$2,337.50
08/05/2020	Stephen Imundo	Senior Staff Attorneys		70	3.25	\$425.00	\$1,381.25
08/05/2020	Stephen Imundo	Senior Staff Attorneys		70	5.75	\$425.00	\$2,443.75
08/06/2020	Justin Ratliff	Staff Attorney		70	1.00	\$350.00	\$350.00
08/06/2020	Stephen Imundo	Senior Staff Attorneys		70	2.75	\$425.00	\$1,168.75
08/07/2020	Rebecca Boon	Partner		70	0.50	\$875.00	\$437.50
08/07/2020	Johanna Pitcairn	Litigation Support		70	0.25	\$400.00	\$100.00
08/10/2020	Stephen Imundo	Senior Staff Attorneys		70	6.50	\$425.00	\$2,762.50
08/10/2020	Stephen Imundo	Senior Staff Attorneys		70	3.25	\$425.00	\$1,381.25
08/11/2020	Stephen Imundo	Senior Staff Attorneys		70	14.00	\$425.00	\$5,950.00
08/12/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
08/13/2020	Justin Ratliff	Staff Attorney		70	2.00	\$350.00	\$700.00
08/17/2020	Stephen Imundo	Senior Staff Attorneys		70	8.75	\$425.00	\$3,718.75
08/18/2020	Stephen Imundo	Senior Staff Attorneys		70	7.25	\$425.00	\$3,081.25
08/25/2020	Stephen Imundo	Senior Staff Attorneys		70	1.50	\$425.00	\$637.50
08/27/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
08/28/2020	Ryan Dykhous	Associate		70	1.50	\$425.00	\$637.50
09/01/2020	Stephen Imundo	Senior Staff Attorneys		70	7.50	\$425.00	\$3,187.50
09/03/2020	Stephen Imundo	Senior Staff Attorneys		70	8.25	\$425.00	\$3,506.25
09/04/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
09/15/2020	Jose Echegaray	Case Managers		70	0.25	\$350.00	\$87.50
09/16/2020	Rebecca Boon	Partner		70	3.00	\$875.00	\$2,625.00
09/16/2020	Jeremy Robinson	Partner		70	5.50	\$900.00	\$4,950.00

09/16/2020	Jose Echegaray	Case Managers		70	1.00	\$350.00	\$350.00
09/17/2020	Jeremy Robinson	Partner		70	4.00	\$900.00	\$3,600.00
09/22/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
09/23/2020	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
09/23/2020	Jose Echegaray	Case Managers		70	0.25	\$350.00	\$87.50
09/28/2020	Jacob Foster	Investigator		70	2.50	\$300.00	\$750.00
10/01/2020	Jose Echegaray	Case Managers		70	0.50	\$350.00	\$175.00
10/01/2020	Ryan Dykhhouse	Associate		70	1.50	\$425.00	\$637.50
10/04/2020	Rebecca Boon	Partner		70	1.50	\$875.00	\$1,312.50
10/05/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
10/05/2020	Jose Echegaray	Case Managers		70	0.25	\$350.00	\$87.50
10/06/2020	Jacob Foster	Investigator		70	4.00	\$300.00	\$1,200.00
10/06/2020	Jacob Foster	Investigator		70	0.50	\$300.00	\$150.00
10/06/2020	Jose Echegaray	Case Managers		70	2.50	\$350.00	\$875.00
10/06/2020	Stephen Imundo	Senior Staff Attorneys		70	5.75	\$425.00	\$2,443.75
10/07/2020	Stephen Imundo	Senior Staff Attorneys		70	7.75	\$425.00	\$3,293.75
10/08/2020	Jose Echegaray	Case Managers		70	0.50	\$350.00	\$175.00
10/08/2020	Richard Gluck	Senior Counsel		70	0.25	\$800.00	\$200.00
10/09/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
10/12/2020	Rebecca Boon	Partner		70	0.50	\$875.00	\$437.50
10/12/2020	Jose Echegaray	Case Managers		70	1.25	\$350.00	\$437.50
10/12/2020	Jose Echegaray	Case Managers		70	0.25	\$350.00	\$87.50
10/12/2020	Richard Gluck	Senior Counsel		70	0.50	\$800.00	\$400.00
10/12/2020	Richard Gluck	Senior Counsel		70	1.25	\$800.00	\$1,000.00
10/12/2020	Richard Gluck	Senior Counsel		70	0.25	\$800.00	\$200.00
10/12/2020	Stephen Imundo	Senior Staff Attorneys		70	1.50	\$425.00	\$637.50
10/13/2020	Jose Echegaray	Case Managers		70	2.25	\$350.00	\$787.50
10/13/2020	Stephen Imundo	Senior Staff Attorneys		70	4.00	\$425.00	\$1,700.00
10/14/2020	Rebecca Boon	Partner		70	3.00	\$875.00	\$2,625.00

10/14/2020	Richard Gluck	Senior Counsel		70	0.50	\$800.00	\$400.00
10/14/2020	Richard Gluck	Senior Counsel		70	0.25	\$800.00	\$200.00
10/14/2020	Stephen Imundo	Senior Staff Attorneys		70	1.25	\$425.00	\$531.25
10/15/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
10/15/2020	Jose Echegaray	Case Managers		70	0.25	\$350.00	\$87.50
10/15/2020	Richard Gluck	Senior Counsel		70	0.25	\$800.00	\$200.00
10/15/2020	Richard Gluck	Senior Counsel		70	0.25	\$800.00	\$200.00
10/15/2020	Stephen Imundo	Senior Staff Attorneys		70	9.50	\$425.00	\$4,037.50
10/15/2020	Stephen Imundo	Senior Staff Attorneys		70	0.50	\$425.00	\$212.50
10/16/2020	Rebecca Boon	Partner		70	3.00	\$875.00	\$2,625.00
10/16/2020	Richard Gluck	Senior Counsel		70	0.25	\$800.00	\$200.00
10/17/2020	Rebecca Boon	Partner		70	1.50	\$875.00	\$1,312.50
10/18/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
10/19/2020	Rebecca Boon	Partner		70	0.50	\$875.00	\$437.50
10/19/2020	Richard Gluck	Senior Counsel		70	2.50	\$800.00	\$2,000.00
10/20/2020	Rebecca Boon	Partner		70	2.50	\$875.00	\$2,187.50
10/20/2020	Richard Gluck	Senior Counsel		70	0.25	\$800.00	\$200.00
10/20/2020	Richard Gluck	Senior Counsel		70	0.25	\$800.00	\$200.00
10/21/2020	Rebecca Boon	Partner		70	2.50	\$875.00	\$2,187.50
10/21/2020	Stephen Imundo	Senior Staff Attorneys		70	7.75	\$425.00	\$3,293.75
10/22/2020	Rebecca Boon	Partner		70	0.75	\$875.00	\$656.25
10/23/2020	Stephen Imundo	Senior Staff Attorneys		70	7.75	\$425.00	\$3,293.75
10/24/2020	Rebecca Boon	Partner		70	0.50	\$875.00	\$437.50
10/26/2020	Rebecca Boon	Partner		70	0.50	\$875.00	\$437.50
10/26/2020	Johanna Pitcairn	Litigation Support		70	1.50	\$400.00	\$600.00
10/26/2020	Richard Gluck	Senior Counsel		70	0.50	\$800.00	\$400.00
10/26/2020	Brian Chau	Senior Staff Attorneys		70	10.00	\$425.00	\$4,250.00
10/26/2020	Richard Gluck	Senior Counsel		70	2.25	\$800.00	\$1,800.00
10/26/2020	Ryan Dykhouse	Associate		70	0.75	\$425.00	\$318.75

10/26/2020	Stephen Imundo	Senior Staff Attorneys		70	2.25	\$425.00	\$956.25
10/27/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
10/27/2020	Brian Chau	Senior Staff Attorneys		70	5.00	\$425.00	\$2,125.00
10/28/2020	Rebecca Boon	Partner		70	0.75	\$875.00	\$656.25
10/28/2020	Rebecca Boon	Partner		70	0.50	\$875.00	\$437.50
10/28/2020	Stephen Imundo	Senior Staff Attorneys		70	9.75	\$425.00	\$4,143.75
10/30/2020	Michelle Leung	Case Managers		70	0.75	\$350.00	\$262.50
11/02/2020	Stephen Imundo	Senior Staff Attorneys		70	7.75	\$425.00	\$3,293.75
11/03/2020	Rebecca Boon	Partner		70	0.50	\$875.00	\$437.50
11/04/2020	Richard Gluck	Senior Counsel		70	0.50	\$800.00	\$400.00
11/04/2020	Stephen Imundo	Senior Staff Attorneys		70	3.50	\$425.00	\$1,487.50
11/05/2020	Rebecca Boon	Partner		70	0.75	\$875.00	\$656.25
11/05/2020	Daniel Renehan	Staff Attorney		70	7.50	\$400.00	\$3,000.00
11/05/2020	Stephen Imundo	Senior Staff Attorneys		70	7.25	\$425.00	\$3,081.25
11/06/2020	Andrew Boruch	Senior Staff Attorneys		70	5.75	\$425.00	\$2,443.75
11/06/2020	Daniel Renehan	Staff Attorney		70	4.50	\$400.00	\$1,800.00
11/06/2020	Richard Gluck	Senior Counsel		70	1.00	\$800.00	\$800.00
11/07/2020	Lauren Cormier	Staff Attorney		70	2.00	\$375.00	\$750.00
11/08/2020	Stephen Imundo	Senior Staff Attorneys		70	2.00	\$425.00	\$850.00
11/09/2020	Andrew Boruch	Senior Staff Attorneys		70	4.75	\$425.00	\$2,018.75
11/09/2020	Andrew Boruch	Senior Staff Attorneys		70	3.75	\$425.00	\$1,593.75
11/09/2020	Daniel Renehan	Staff Attorney		70	9.50	\$400.00	\$3,800.00
11/09/2020	Jose Echegaray	Case Managers		70	0.25	\$350.00	\$87.50
11/09/2020	Lauren Cormier	Staff Attorney		70	1.00	\$375.00	\$375.00
11/10/2020	Andrew Boruch	Senior Staff Attorneys		70	4.50	\$425.00	\$1,912.50
11/10/2020	Andrew Boruch	Senior Staff Attorneys		70	4.00	\$425.00	\$1,700.00
11/10/2020	Daniel Renehan	Staff Attorney		70	8.50	\$400.00	\$3,400.00
11/10/2020	Lauren Cormier	Staff Attorney		70	1.50	\$375.00	\$562.50
11/11/2020	Jose Echegaray	Case Managers		70	3.50	\$350.00	\$1,225.00
11/11/2020	Ryan Dykhous	Associate		70	0.25	\$425.00	\$106.25

11/11/2020	Lauren Cormier	Staff Attorney		70	4.00	\$375.00	\$1,500.00
11/12/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
11/12/2020	Erick Ladson	Staff Attorney		70	10.00	\$400.00	\$4,000.00
11/12/2020	Richard Gluck	Senior Counsel		70	0.50	\$800.00	\$400.00
11/12/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50
11/12/2020	Lauren Cormier	Staff Attorney		70	4.00	\$375.00	\$1,500.00
11/13/2020	Stephen Imundo	Senior Staff Attorneys		70	1.50	\$425.00	\$637.50
11/13/2020	Stephen Imundo	Senior Staff Attorneys		70	3.75	\$425.00	\$1,593.75
11/13/2020	Lauren Cormier	Staff Attorney		70	4.00	\$375.00	\$1,500.00
11/14/2020	Stephen Imundo	Senior Staff Attorneys		70	1.00	\$425.00	\$425.00
11/16/2020	Lauren Cormier	Staff Attorney		70	4.50	\$375.00	\$1,687.50
11/16/2020	Stephen Imundo	Senior Staff Attorneys		70	8.00	\$425.00	\$3,400.00
11/17/2020	Stephen Imundo	Senior Staff Attorneys		70	9.00	\$425.00	\$3,825.00
11/18/2020	Stephen Imundo	Senior Staff Attorneys		70	7.00	\$425.00	\$2,975.00
11/19/2020	Stephen Imundo	Senior Staff Attorneys		70	6.00	\$425.00	\$2,550.00
11/20/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
11/20/2020	Daniel Renehan	Staff Attorney		70	0.50	\$400.00	\$200.00
11/20/2020	Richard Gluck	Senior Counsel		70	0.50	\$800.00	\$400.00
11/20/2020	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50
11/23/2020	Rebecca Boon	Partner		70	3.50	\$875.00	\$3,062.50
11/24/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
11/24/2020	Salvatore Graziano	Partner		70	0.50	\$1,150.00	\$575.00
11/24/2020	Stephen Imundo	Senior Staff Attorneys		70	2.50	\$425.00	\$1,062.50
11/25/2020	Jeremy Robinson	Partner		70	1.00	\$900.00	\$900.00
11/25/2020	Stephen Imundo	Senior Staff Attorneys		70	10.25	\$425.00	\$4,356.25
11/28/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00

11/29/2020	Stephen Imundo	Senior Staff Attorneys		70	3.00	\$425.00	\$1,275.00
11/30/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
12/01/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
12/02/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
12/03/2020	Rebecca Boon	Partner		70	1.00	\$875.00	\$875.00
12/03/2020	Richard Gluck	Senior Counsel		70	1.00	\$800.00	\$800.00
12/04/2020	Rebecca Boon	Partner		70	0.75	\$875.00	\$656.25
12/04/2020	Stephen Imundo	Senior Staff Attorneys		70	3.25	\$425.00	\$1,381.25
12/07/2020	Rebecca Boon	Partner		70	5.50	\$875.00	\$4,812.50
12/07/2020	Richard Gluck	Senior Counsel		70	1.75	\$800.00	\$1,400.00
12/08/2020	Rebecca Boon	Partner		70	5.00	\$875.00	\$4,375.00
12/08/2020	Richard Gluck	Senior Counsel		70	1.00	\$800.00	\$800.00
12/09/2020	Rebecca Boon	Partner		70	6.50	\$875.00	\$5,687.50
12/10/2020	Rebecca Boon	Partner		70	2.00	\$875.00	\$1,750.00
12/11/2020	Stephen Imundo	Senior Staff Attorneys		70	1.00	\$425.00	\$425.00
12/15/2020	Richard Gluck	Senior Counsel		70	0.25	\$800.00	\$200.00
12/18/2020	Addison F. Golladay	Staff Attorney		70	3.25	\$400.00	\$1,300.00
12/30/2020	Richard Gluck	Senior Counsel		70	0.25	\$800.00	\$200.00
12/30/2020	Richard Gluck	Senior Counsel		70	2.50	\$800.00	\$2,000.00
01/02/2021	Stephen Imundo	Senior Staff Attorneys		70	5.75	\$425.00	\$2,443.75
01/04/2021	Richard Gluck	Senior Counsel		70	0.25	\$800.00	\$200.00
01/04/2021	Richard Gluck	Senior Counsel		70	0.25	\$800.00	\$200.00
01/04/2021	Stephen Imundo	Senior Staff Attorneys		70	12.00	\$425.00	\$5,100.00
01/06/2021	Helen Fikrey	Staff Attorney		70	8.00	\$400.00	\$3,200.00
01/06/2021	Ryan Dykhous	Associate		70	0.50	\$425.00	\$212.50

01/06/2021	Stephen Imundo	Senior Staff Attorneys		70	11.75	\$425.00	\$4,993.75
01/07/2021	Richard Gluck	Senior Counsel		70	0.50	\$800.00	\$400.00
01/08/2021	Richard Gluck	Senior Counsel		70	1.00	\$800.00	\$800.00
01/08/2021	Stephen Imundo	Senior Staff Attorneys		70	7.50	\$425.00	\$3,187.50
01/10/2021	Helen Fikrey	Staff Attorney		70	6.50	\$400.00	\$2,600.00
01/11/2021	Stephen Imundo	Senior Staff Attorneys		70	3.25	\$425.00	\$1,381.25
01/12/2021	Stephen Imundo	Senior Staff Attorneys		70	5.00	\$425.00	\$2,125.00
01/13/2021	Stephen Imundo	Senior Staff Attorneys		70	9.25	\$425.00	\$3,931.25
01/14/2021	Johanna Pitcairn	Litigation Support		70	1.25	\$400.00	\$500.00
01/14/2021	Stephen Imundo	Senior Staff Attorneys		70	5.00	\$425.00	\$2,125.00
01/16/2021	Stephen Imundo	Senior Staff Attorneys		70	4.00	\$425.00	\$1,700.00
01/19/2021	Andrew Boruch	Senior Staff Attorneys		70	7.75	\$425.00	\$3,293.75
01/19/2021	Erick Ladson	Staff Attorney		70	8.00	\$400.00	\$3,200.00
01/19/2021	Jed Koslow	Staff Attorney		70	11.75	\$400.00	\$4,700.00
01/19/2021	Preya Rodriguez	Paralegal		70	7.00	\$325.00	\$2,275.00
01/19/2021	Stephen Imundo	Senior Staff Attorneys		70	9.50	\$425.00	\$4,037.50
01/20/2021	Addison F. Golladay	Staff Attorney		70	8.50	\$400.00	\$3,400.00
01/20/2021	Andrew Boruch	Senior Staff Attorneys		70	9.00	\$425.00	\$3,825.00
01/20/2021	Erick Ladson	Staff Attorney		70	12.50	\$400.00	\$5,000.00
01/20/2021	Helen Fikrey	Staff Attorney		70	12.50	\$400.00	\$5,000.00

01/20/2021	Jed Koslow	Staff Attorney		70	6.75	\$400.00	\$2,700.00
01/20/2021	Lawrence Hosmer	Senior Staff Attorneys		70	7.00	\$425.00	\$2,975.00
01/20/2021	Richard Gluck	Senior Counsel		70	1.25	\$800.00	\$1,000.00
01/20/2021	Stephen Imundo	Senior Staff Attorneys		70	9.00	\$425.00	\$3,825.00
01/21/2021	Addison F. Golladay	Staff Attorney		70	11.00	\$400.00	\$4,400.00
01/21/2021	Andrew Boruch	Senior Staff Attorneys		70	9.25	\$425.00	\$3,931.25
01/21/2021	Erick Ladson	Staff Attorney		70	11.50	\$400.00	\$4,600.00
01/21/2021	Lawrence Hosmer	Senior Staff Attorneys		70	9.25	\$425.00	\$3,931.25
01/21/2021	Ryan Dykhous	Associate		70	2.25	\$425.00	\$956.25
01/21/2021	Stephen Imundo	Senior Staff Attorneys		70	7.75	\$425.00	\$3,293.75
01/22/2021	Addison F. Golladay	Staff Attorney		70	5.50	\$400.00	\$2,200.00
01/22/2021	Andrew Boruch	Senior Staff Attorneys		70	9.00	\$425.00	\$3,825.00
01/22/2021	Erick Ladson	Staff Attorney		70	8.00	\$400.00	\$3,200.00
01/22/2021	Jed Koslow	Staff Attorney		70	9.25	\$400.00	\$3,700.00
01/22/2021	Lawrence Hosmer	Senior Staff Attorneys		70	8.00	\$425.00	\$3,400.00
01/22/2021	Stephen Imundo	Senior Staff Attorneys		70	13.00	\$425.00	\$5,525.00
01/25/2021	Stephen Imundo	Senior Staff Attorneys		70	3.00	\$425.00	\$1,275.00
01/26/2021	Addison F. Golladay	Staff Attorney		70	10.50	\$400.00	\$4,200.00
01/27/2021	Addison F. Golladay	Staff Attorney		70	8.00	\$400.00	\$3,200.00
01/27/2021	Jed Koslow	Staff Attorney		70	3.75	\$400.00	\$1,500.00
01/27/2021	Jose Echegaray	Case Managers		70	0.75	\$350.00	\$262.50
01/28/2021	Helen Fikrey	Staff Attorney		70	4.00	\$400.00	\$1,600.00
01/28/2021	Jed Koslow	Staff Attorney		70	7.75	\$400.00	\$3,100.00
01/28/2021	Jose Echegaray	Case Managers		70	9.00	\$350.00	\$3,150.00
01/29/2021	Helen Fikrey	Staff Attorney		70	8.00	\$400.00	\$3,200.00
01/29/2021	Jed Koslow	Staff Attorney		70	7.75	\$400.00	\$3,100.00

01/29/2021	Jose Echegaray	Case Managers		70	8.25	\$350.00	\$2,887.50
01/29/2021	Stephen Imundo	Senior Staff Attorneys		70	7.00	\$425.00	\$2,975.00
01/30/2021	Helen Fikrey	Staff Attorney		70	6.50	\$400.00	\$2,600.00
01/31/2021	Helen Fikrey	Staff Attorney		70	7.00	\$400.00	\$2,800.00
02/01/2021	Jed Koslow	Staff Attorney		70	3.00	\$400.00	\$1,200.00
02/01/2021	Jed Koslow	Staff Attorney		70	8.00	\$400.00	\$3,200.00
02/01/2021	Johanna Pitcairn	Litigation Support		70	1.25	\$400.00	\$500.00
02/01/2021	Jose Echegaray	Case Managers		70	0.25	\$350.00	\$87.50
02/01/2021	Jose Echegaray	Case Managers		70	0.50	\$350.00	\$175.00
02/01/2021	Richard Gluck	Senior Counsel		70	3.25	\$800.00	\$2,600.00
02/02/2021	Helen Fikrey	Staff Attorney		70	10.25	\$400.00	\$4,100.00
02/02/2021	Jed Koslow	Staff Attorney		70	9.50	\$400.00	\$3,800.00
02/02/2021	Richard Gluck	Senior Counsel		70	2.25	\$800.00	\$1,800.00
02/03/2021	Helen Fikrey	Staff Attorney		70	5.00	\$400.00	\$2,000.00
02/03/2021	Jed Koslow	Staff Attorney		70	10.00	\$400.00	\$4,000.00
02/03/2021	Richard Gluck	Senior Counsel		70	2.00	\$800.00	\$1,600.00
02/04/2021	Jeremy Robinson	Partner		70	4.00	\$900.00	\$3,600.00
02/04/2021	Helen Fikrey	Staff Attorney		70	9.50	\$400.00	\$3,800.00
02/04/2021	Jed Koslow	Staff Attorney		70	7.00	\$400.00	\$2,800.00
02/04/2021	Stephen Imundo	Senior Staff Attorneys		70	7.00	\$425.00	\$2,975.00
02/05/2021	Jeremy Robinson	Partner		70	4.00	\$900.00	\$3,600.00
02/05/2021	Helen Fikrey	Staff Attorney		70	3.25	\$400.00	\$1,300.00
02/05/2021	Jed Koslow	Staff Attorney		70	2.50	\$400.00	\$1,000.00
02/05/2021	Richard Gluck	Senior Counsel		70	3.25	\$800.00	\$2,600.00
02/07/2021	Helen Fikrey	Staff Attorney		70	5.00	\$400.00	\$2,000.00
02/08/2021	Addison F. Golladay	Staff Attorney		70	7.50	\$400.00	\$3,000.00
02/08/2021	Helen Fikrey	Staff Attorney		70	5.50	\$400.00	\$2,200.00
02/08/2021	Jed Koslow	Staff Attorney		70	11.00	\$400.00	\$4,400.00
02/09/2021	Addison F. Golladay	Staff Attorney		70	7.50	\$400.00	\$3,000.00

02/09/2021	Brian Chau	Senior Staff Attorneys		70	10.00	\$425.00	\$4,250.00
02/09/2021	Helen Fikrey	Staff Attorney		70	9.00	\$400.00	\$3,600.00
02/09/2021	Jed Koslow	Staff Attorney		70	10.50	\$400.00	\$4,200.00
02/09/2021	Richard Gluck	Senior Counsel		70	3.25	\$800.00	\$2,600.00
02/10/2021	Addison F. Golladay	Staff Attorney		70	6.50	\$400.00	\$2,600.00
02/10/2021	Brian Chau	Senior Staff Attorneys		70	10.00	\$425.00	\$4,250.00
02/10/2021	Helen Fikrey	Staff Attorney		70	3.50	\$400.00	\$1,400.00
02/10/2021	Jed Koslow	Staff Attorney		70	6.00	\$400.00	\$2,400.00
02/10/2021	Richard Gluck	Senior Counsel		70	3.50	\$800.00	\$2,800.00
02/10/2021	Richard Gluck	Senior Counsel		70	1.75	\$800.00	\$1,400.00
02/10/2021	Richard Gluck	Senior Counsel		70	0.50	\$800.00	\$400.00
02/11/2021	Addison F. Golladay	Staff Attorney		70	6.50	\$400.00	\$2,600.00
02/11/2021	Brian Chau	Senior Staff Attorneys		70	10.00	\$425.00	\$4,250.00
02/11/2021	Jed Koslow	Staff Attorney		70	10.00	\$400.00	\$4,000.00
02/11/2021	Richard Gluck	Senior Counsel		70	1.50	\$800.00	\$1,200.00
02/11/2021	Richard Gluck	Senior Counsel		70	1.75	\$800.00	\$1,400.00
02/12/2021	Addison F. Golladay	Staff Attorney		70	6.50	\$400.00	\$2,600.00
02/12/2021	Helen Fikrey	Staff Attorney		70	8.75	\$400.00	\$3,500.00
02/12/2021	Jed Koslow	Staff Attorney		70	2.50	\$400.00	\$1,000.00
02/13/2021	Helen Fikrey	Staff Attorney		70	9.75	\$400.00	\$3,900.00
02/14/2021	Addison F. Golladay	Staff Attorney		70	5.50	\$400.00	\$2,200.00
02/14/2021	Helen Fikrey	Staff Attorney		70	3.50	\$400.00	\$1,400.00
02/14/2021	Richard Gluck	Senior Counsel		70	3.75	\$800.00	\$3,000.00
02/15/2021	Jose Echegaray	Case Managers		70	2.00	\$350.00	\$700.00
02/15/2021	Stephen Imundo	Senior Staff Attorneys		70	2.25	\$425.00	\$956.25
02/16/2021	Addison F. Golladay	Staff Attorney		70	10.00	\$400.00	\$4,000.00
02/16/2021	Brian Chau	Senior Staff Attorneys		70	10.00	\$425.00	\$4,250.00
02/16/2021	Jed Koslow	Staff Attorney		70	2.25	\$400.00	\$900.00
02/16/2021	Jed Koslow	Staff Attorney		70	9.00	\$400.00	\$3,600.00
02/16/2021	Jose Echegaray	Case Managers		70	4.50	\$350.00	\$1,575.00

02/17/2021	Addison F. Golladay	Staff Attorney		70	10.00	\$400.00	\$4,000.00
02/17/2021	Brian Chau	Senior Staff Attorneys		70	10.00	\$425.00	\$4,250.00
02/17/2021	Jose Echegaray	Case Managers		70	4.00	\$350.00	\$1,400.00
02/17/2021	Stephen Imundo	Senior Staff Attorneys		70	7.00	\$425.00	\$2,975.00
02/18/2021	Addison F. Golladay	Staff Attorney		70	10.00	\$400.00	\$4,000.00
02/18/2021	Brian Chau	Senior Staff Attorneys		70	10.00	\$425.00	\$4,250.00
02/18/2021	Jose Echegaray	Case Managers		70	0.25	\$350.00	\$87.50
02/18/2021	Stephen Imundo	Senior Staff Attorneys		70	3.00	\$425.00	\$1,275.00
02/19/2021	Addison F. Golladay	Staff Attorney		70	6.50	\$400.00	\$2,600.00
02/19/2021	Brian Chau	Senior Staff Attorneys		70	10.00	\$425.00	\$4,250.00
02/19/2021	Helen Fikrey	Staff Attorney		70	7.25	\$400.00	\$2,900.00
02/20/2021	Addison F. Golladay	Staff Attorney		70	3.50	\$400.00	\$1,400.00
02/20/2021	Helen Fikrey	Staff Attorney		70	4.75	\$400.00	\$1,900.00
02/21/2021	Stephen Imundo	Senior Staff Attorneys		70	2.00	\$425.00	\$850.00
02/24/2021	Johanna Pitcairn	Litigation Support		70	0.50	\$400.00	\$200.00
02/26/2021	Jose Echegaray	Case Managers		70	4.50	\$350.00	\$1,575.00
02/26/2021	Preya Rodriguez	Paralegal		70	6.00	\$325.00	\$1,950.00
03/01/2021	Andrew Boruch	Senior Staff Attorneys		70	10.75	\$425.00	\$4,568.75
03/02/2021	Andrew Boruch	Senior Staff Attorneys		70	9.50	\$425.00	\$4,037.50
03/02/2021	Johanna Pitcairn	Litigation Support		70	0.50	\$400.00	\$200.00
03/03/2021	Jose Echegaray	Case Managers		70	1.00	\$350.00	\$350.00
03/03/2021	Jose Echegaray	Case Managers		70	5.50	\$350.00	\$1,925.00
03/04/2021	Stephen Imundo	Senior Staff Attorneys		70	8.75	\$425.00	\$3,718.75
03/05/2021	Richard Gluck	Senior Counsel		70	1.25	\$800.00	\$1,000.00
03/08/2021	Johanna Pitcairn	Litigation Support		70	0.50	\$400.00	\$200.00

03/15/2021	Richard Gluck	Senior Counsel		70	0.50	\$800.00	\$400.00
03/18/2021	Johanna Pitcairn	Litigation Support		70	0.50	\$400.00	\$200.00
03/18/2021	Michelle Leung	Case Managers		70	2.50	\$350.00	\$875.00
03/19/2021	Juan Lossada	Staff Attorney		70	0.25	\$400.00	\$100.00
03/22/2021	Addison F. Golladay	Staff Attorney		70	9.00	\$400.00	\$3,600.00
03/22/2021	Johanna Pitcairn	Litigation Support		70	2.00	\$400.00	\$800.00
03/22/2021	Juan Lossada	Staff Attorney		70	8.00	\$400.00	\$3,200.00
03/23/2021	Addison F. Golladay	Staff Attorney		70	6.00	\$400.00	\$2,400.00
03/23/2021	Johanna Pitcairn	Litigation Support		70	1.00	\$400.00	\$400.00
03/23/2021	Juan Lossada	Staff Attorney		70	6.25	\$400.00	\$2,500.00
03/23/2021	Richard Gluck	Senior Counsel		70	3.25	\$800.00	\$2,600.00
03/24/2021	Jose Echegaray	Case Managers		70	2.50	\$350.00	\$875.00
03/25/2021	Johanna Pitcairn	Litigation Support		70	1.00	\$400.00	\$400.00
03/25/2021	Richard Gluck	Senior Counsel		70	2.75	\$800.00	\$2,200.00
03/26/2021	Erick Ladson	Staff Attorney		70	3.50	\$400.00	\$1,400.00
03/26/2021	Richard Gluck	Senior Counsel		70	2.50	\$800.00	\$2,000.00
03/31/2021	Richard Gluck	Senior Counsel		70	3.00	\$800.00	\$2,400.00
TOTALS FOR PROJECT #70:				2,271.50			\$1,204,875.00
Project #71: Expert Work: Lead Counsel spent 122 hours with a lodestar of \$51,506.25 on work with experts not included in the prior projects. This work, the details of which are broken down chronologically below, included conferring with experts in analyzing the claims and the discovery needed.							
Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
09/26/2018	David Stickney	Partner		71	0.75	\$975.00	\$731.25

10/09/2018	Jose Echegaray	Case Managers		71	0.75	\$350.00	\$262.50
10/10/2018	Jacob Spaid	Associate		71	3.25	\$475.00	\$1,543.75
10/10/2018	Jose Echegaray	Case Managers		71	1.00	\$350.00	\$350.00
10/10/2018	Julia Tebor	Associate		71	6.50	\$575.00	\$3,737.50
10/17/2018	Jose Echegaray	Case Managers		71	0.25	\$350.00	\$87.50
10/17/2018	Lucas Gilmore	Senior Counsel		71	0.50	\$775.00	\$387.50
02/20/2020	Ryan Dykhous	Associate		71	0.50	\$425.00	\$212.50
07/10/2020	Stephen Imundo	Senior Staff Attorneys		71	3.50	\$425.00	\$1,487.50
09/21/2020	Salvatore Graziano	Partner		71	1.00	\$1,150.00	\$1,150.00
12/29/2020	Richard Gluck	Senior Counsel		71	1.00	\$800.00	\$800.00
12/30/2020	Richard Gluck	Senior Counsel		71	0.25	\$800.00	\$200.00
01/25/2021	Richard Gluck	Senior Counsel		71	1.25	\$800.00	\$1,000.00
01/27/2021	Andrew Boruch	Senior Staff Attorneys		71	4.75	\$425.00	\$2,018.75
01/27/2021	Stephen Imundo	Senior Staff Attorneys		71	3.00	\$425.00	\$1,275.00
01/28/2021	Brian Chau	Senior Staff Attorneys		71	4.00	\$425.00	\$1,700.00
01/28/2021	Ryan Dykhous	Associate		71	5.75	\$425.00	\$2,443.75
02/04/2021	Richard Gluck	Senior Counsel		71	0.50	\$800.00	\$400.00
02/10/2021	Richard Gluck	Senior Counsel		71	0.25	\$800.00	\$200.00
02/16/2021	Jose Echegaray	Case Managers		71	1.00	\$350.00	\$350.00
02/17/2021	Jose Echegaray	Case Managers		71	2.25	\$350.00	\$787.50
02/17/2021	Preya Rodriguez	Paralegal		71	0.75	\$325.00	\$243.75
02/17/2021	Richard Gluck	Senior Counsel		71	0.75	\$800.00	\$600.00
02/17/2021	Ryan Candee	Senior Staff Attorneys		71	2.25	\$425.00	\$956.25
02/18/2021	Andrew Boruch	Senior Staff Attorneys		71	4.75	\$425.00	\$2,018.75
02/18/2021	Jose Echegaray	Case Managers		71	2.00	\$350.00	\$700.00
02/18/2021	Ryan Candee	Senior Staff Attorneys		71	6.25	\$425.00	\$2,656.25
02/18/2021	Stephen Imundo	Senior Staff Attorneys		71	3.00	\$425.00	\$1,275.00
02/19/2021	Stephen Imundo	Senior Staff Attorneys		71	3.50	\$425.00	\$1,487.50

02/22/2021	Jose Echegaray	Case Managers		71	3.50	\$350.00	\$1,225.00
02/23/2021	Preya Rodriguez	Paralegal		71	7.00	\$325.00	\$2,275.00
02/24/2021	Preya Rodriguez	Paralegal		71	10.50	\$325.00	\$3,412.50
02/25/2021	Preya Rodriguez	Paralegal		71	6.75	\$325.00	\$2,193.75
03/02/2021	Jose Echegaray	Case Managers		71	3.50	\$350.00	\$1,225.00
03/02/2021	Preya Rodriguez	Paralegal		71	7.25	\$325.00	\$2,356.25
03/02/2021	Stephen Imundo	Senior Staff Attorneys		71	1.00	\$425.00	\$425.00
03/04/2021	Andrew Boruch	Senior Staff Attorneys		71	8.50	\$425.00	\$3,612.50
03/04/2021	Ryan Candee	Senior Staff Attorneys		71	7.75	\$425.00	\$3,293.75
03/26/2021	Ryan Dykhouse	Associate		71	1.00	\$425.00	\$425.00
			TOTALS FOR PROJECT #71:		122.00		\$51,506.25
Project #72: Miscellaneous and Administrative: Lead Counsel spent 298.5 hours with a lodestar of \$112,603.75 on other miscellaneous or administrative matters, not included in one of the foregoing projects. This work, the details of which are broken down chronologically below, included preparing and filing pro hac vice motions and notices of appearance; updating calendars and schedules; organizing of documents, and updating and maintaining the document database.							
Date	Professional	Prof Type	Narrative	Project Number	Hours	Rate	Lodestar
07/20/2018	Dena Bielasz	Case Managers		72	0.50	\$335.00	\$167.50
07/24/2018	Dena Bielasz	Case Managers		72	2.00	\$335.00	\$670.00
08/15/2018	Dena Bielasz	Case Managers		72	5.25	\$335.00	\$1,758.75
08/16/2018	Dena Bielasz	Case Managers		72	3.25	\$335.00	\$1,088.75
08/17/2018	Dena Bielasz	Case Managers		72	2.25	\$335.00	\$753.75
08/21/2018	Dena Bielasz	Case Managers		72	1.25	\$335.00	\$418.75

08/23/2018	Dena Bielasz	Case Managers		72	1.75	\$335.00	\$586.25
08/24/2018	Dena Bielasz	Case Managers		72	1.25	\$335.00	\$418.75
09/05/2018	David Stickney	Partner		72	0.50	\$975.00	\$487.50
09/07/2018	Dena Bielasz	Case Managers		72	0.50	\$335.00	\$167.50
09/10/2018	Dena Bielasz	Case Managers		72	0.50	\$335.00	\$167.50
10/02/2018	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
10/04/2018	Dena Bielasz	Case Managers		72	0.50	\$335.00	\$167.50
10/04/2018	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
10/09/2018	Dena Bielasz	Case Managers		72	3.50	\$335.00	\$1,172.50
10/10/2018	Dena Bielasz	Case Managers		72	4.00	\$335.00	\$1,340.00
10/10/2018	Jose Echegaray	Case Managers		72	1.00	\$350.00	\$350.00
10/12/2018	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
10/12/2018	Dena Bielasz	Case Managers		72	0.50	\$335.00	\$167.50
10/17/2018	Jose Echegaray	Case Managers		72	0.75	\$350.00	\$262.50
10/18/2018	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00

10/29/2018	Dena Bielasz	Case Managers		72	0.50	\$335.00	\$167.50
10/31/2018	Dena Bielasz	Case Managers		72	0.50	\$335.00	\$167.50
11/08/2018	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
11/14/2018	Dena Bielasz	Case Managers		72	1.50	\$335.00	\$502.50
11/15/2018	Dena Bielasz	Case Managers		72	3.50	\$335.00	\$1,172.50
11/16/2018	Jose Echegaray	Case Managers		72	0.75	\$350.00	\$262.50
11/16/2018	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
01/02/2019	Jose Echegaray	Case Managers		72	0.75	\$350.00	\$262.50
02/07/2019	Dena Bielasz	Case Managers		72	0.50	\$335.00	\$167.50
02/08/2019	Dena Bielasz	Case Managers		72	0.50	\$335.00	\$167.50
02/13/2019	Dena Bielasz	Case Managers		72	0.75	\$335.00	\$251.25
02/14/2019	Mahiri Buffong	Managing Clerk		72	0.50	\$375.00	\$187.50
02/22/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
02/26/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
03/06/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
03/07/2019	Jose Echegaray	Case Managers		72	2.00	\$350.00	\$700.00
03/07/2019	Mahiri Buffong	Managing Clerk		72	2.00	\$375.00	\$750.00
03/08/2019	Mahiri Buffong	Managing Clerk		72	0.75	\$375.00	\$281.25
06/03/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
06/05/2019	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
06/05/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
06/05/2019	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75

06/20/2019	Jose Echegaray	Case Managers		72	5.00	\$350.00	\$1,750.00
06/21/2019	Mahiri Buffong	Managing Clerk		72	3.00	\$375.00	\$1,125.00
06/21/2019	Michelle Leung	Case Managers		72	1.75	\$350.00	\$612.50
07/08/2019	Mahiri Buffong	Managing Clerk		72	0.50	\$375.00	\$187.50
07/08/2019	Mahiri Buffong	Managing Clerk		72	1.00	\$375.00	\$375.00
07/10/2019	Michelle Leung	Case Managers		72	0.50	\$350.00	\$175.00
07/12/2019	Rebecca Boon	Partner		72	0.50	\$875.00	\$437.50
07/12/2019	Michelle Leung	Case Managers		72	0.25	\$350.00	\$87.50
07/15/2019	Jose Echegaray	Case Managers		72	1.50	\$350.00	\$525.00
07/15/2019	Jose Echegaray	Case Managers		72	1.00	\$350.00	\$350.00
07/15/2019	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
07/16/2019	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
07/16/2019	Julia Tebor	Associate		72	2.00	\$575.00	\$1,150.00
07/17/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
07/17/2019	Mahiri Buffong	Managing Clerk		72	0.75	\$375.00	\$281.25
07/22/2019	Mahiri Buffong	Managing Clerk		72	1.50	\$375.00	\$562.50
07/23/2019	Mahiri Buffong	Managing Clerk		72	1.50	\$375.00	\$562.50
07/26/2019	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
07/30/2019	Jose Echegaray	Case Managers		72	1.00	\$350.00	\$350.00
07/30/2019	Jose Echegaray	Case Managers		72	1.00	\$350.00	\$350.00
07/30/2019	Mahiri Buffong	Managing Clerk		72	3.50	\$375.00	\$1,312.50
07/30/2019	Michelle Leung	Case Managers		72	2.25	\$350.00	\$787.50

07/30/2019	Michelle Leung	Case Managers		72	0.50	\$350.00	\$175.00
07/30/2019	Michelle Leung	Case Managers		72	0.50	\$350.00	\$175.00
07/31/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
07/31/2019	Mahiri Buffong	Managing Clerk		72	3.00	\$375.00	\$1,125.00
08/01/2019	Julia Tebor	Associate		72	1.00	\$575.00	\$575.00
08/01/2019	Mahiri Buffong	Managing Clerk		72	3.25	\$375.00	\$1,218.75
08/01/2019	Michelle Leung	Case Managers		72	0.75	\$350.00	\$262.50
08/02/2019	Mahiri Buffong	Managing Clerk		72	0.50	\$375.00	\$187.50
08/02/2019	Michelle Leung	Case Managers		72	0.25	\$350.00	\$87.50
08/06/2019	Jose Echegaray	Case Managers		72	2.75	\$350.00	\$962.50
08/06/2019	Mahiri Buffong	Managing Clerk		72	0.75	\$375.00	\$281.25
08/06/2019	Michelle Leung	Case Managers		72	0.50	\$350.00	\$175.00
08/08/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
08/08/2019	Michelle Leung	Case Managers		72	0.25	\$350.00	\$87.50
08/29/2019	Michelle Leung	Case Managers		72	0.25	\$350.00	\$87.50
09/03/2019	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
10/02/2019	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
10/03/2019	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
10/03/2019	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
10/03/2019	Michelle Leung	Case Managers		72	0.75	\$350.00	\$262.50
10/07/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
10/07/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
10/08/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50

10/08/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
10/09/2019	Jose Echegaray	Case Managers		72	0.75	\$350.00	\$262.50
10/10/2019	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
10/16/2019	Michelle Leung	Case Managers		72	0.25	\$350.00	\$87.50
11/08/2019	Preya Rodriguez	Paralegal		72	2.50	\$325.00	\$812.50
11/09/2019	Jose Echegaray	Case Managers		72	1.50	\$350.00	\$525.00
11/12/2019	Michelle Leung	Case Managers		72	0.75	\$350.00	\$262.50
11/13/2019	Jose Echegaray	Case Managers		72	2.50	\$350.00	\$875.00
11/13/2019	Mahiri Buffong	Managing Clerk		72	3.75	\$375.00	\$1,406.25
11/13/2019	Michelle Leung	Case Managers		72	2.50	\$350.00	\$875.00
11/13/2019	Ryan Dykhous	Associate		72	2.25	\$425.00	\$956.25
11/20/2019	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
11/20/2019	Michelle Leung	Case Managers		72	0.50	\$350.00	\$175.00
11/21/2019	Mahiri Buffong	Managing Clerk		72	0.75	\$375.00	\$281.25
11/21/2019	Michelle Leung	Case Managers		72	0.25	\$350.00	\$87.50
12/02/2019	Jose Echegaray	Case Managers		72	1.50	\$350.00	\$525.00
12/04/2019	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
12/05/2019	Salvatore Graziano	Partner		72	0.50	\$1,150.00	\$575.00
12/05/2019	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
12/17/2019	Jose Echegaray	Case Managers		72	3.00	\$350.00	\$1,050.00
12/17/2019	Mahiri Buffong	Managing Clerk		72	2.50	\$375.00	\$937.50
12/17/2019	Ryan Dykhous	Associate		72	1.25	\$425.00	\$531.25
12/18/2019	Rebecca Boon	Partner		72	2.00	\$875.00	\$1,750.00
12/18/2019	Ryan Dykhous	Associate		72	0.50	\$425.00	\$212.50
12/19/2019	Mahiri Buffong	Managing Clerk		72	1.00	\$375.00	\$375.00

01/22/2020	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
01/25/2020	Rebecca Boon	Partner		72	1.00	\$875.00	\$875.00
01/27/2020	Preya Rodriguez	Paralegal		72	0.50	\$325.00	\$162.50
02/18/2020	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
02/18/2020	Preya Rodriguez	Paralegal		72	1.75	\$325.00	\$568.75
02/19/2020	Preya Rodriguez	Paralegal		72	1.00	\$325.00	\$325.00
02/25/2020	Salvatore Graziano	Partner		72	0.25	\$1,150.00	\$287.50
03/12/2020	Mahiri Buffong	Managing Clerk		72	0.50	\$375.00	\$187.50
03/26/2020	Preya Rodriguez	Paralegal		72	0.25	\$325.00	\$81.25
03/27/2020	Michelle Leung	Case Managers		72	0.25	\$350.00	\$87.50
05/12/2020	Jose Echegaray	Case Managers		72	1.50	\$350.00	\$525.00
05/12/2020	Ryan Dykhous	Associate		72	1.00	\$425.00	\$425.00
05/13/2020	Jose Echegaray	Case Managers		72	0.75	\$350.00	\$262.50
05/13/2020	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
05/14/2020	Jose Echegaray	Case Managers		72	1.00	\$350.00	\$350.00
05/14/2020	Mahiri Buffong	Managing Clerk		72	1.50	\$375.00	\$562.50
05/16/2020	Rebecca Boon	Partner		72	2.00	\$875.00	\$1,750.00
05/18/2020	Mahiri Buffong	Managing Clerk		72	0.75	\$375.00	\$281.25
05/26/2020	Mahiri Buffong	Managing Clerk		72	0.50	\$375.00	\$187.50
05/26/2020	Mahiri Buffong	Managing Clerk		72	0.50	\$375.00	\$187.50
06/09/2020	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
06/15/2020	Ryan Dykhous	Associate		72	0.50	\$425.00	\$212.50
06/22/2020	Salvatore Graziano	Partner		72	0.25	\$1,150.00	\$287.50
06/23/2020	Mahiri Buffong	Managing Clerk		72	0.50	\$375.00	\$187.50
07/06/2020	Johanna Pitcairn	Litigation Support		72	0.25	\$400.00	\$100.00
07/07/2020	Ryan Dykhous	Associate		72	0.50	\$425.00	\$212.50

07/09/2020	Johanna Pitcairn	Litigation Support		72	1.00	\$400.00	\$400.00
07/15/2020	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
07/20/2020	Jacob Foster	Investigator		72	1.00	\$300.00	\$300.00
07/21/2020	Mahiri Buffong	Managing Clerk		72	0.75	\$375.00	\$281.25
09/02/2020	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
09/14/2020	Rebecca Boon	Partner		72	0.50	\$875.00	\$437.50
09/16/2020	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
09/16/2020	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
09/29/2020	Johanna Pitcairn	Litigation Support		72	2.50	\$400.00	\$1,000.00
09/30/2020	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
10/01/2020	Johanna Pitcairn	Litigation Support		72	0.50	\$400.00	\$200.00
10/02/2020	Johanna Pitcairn	Litigation Support		72	1.00	\$400.00	\$400.00
10/05/2020	Jose Echegaray	Case Managers		72	1.50	\$350.00	\$525.00
10/06/2020	Johanna Pitcairn	Litigation Support		72	0.50	\$400.00	\$200.00
10/06/2020	Richard Gluck	Senior Counsel		72	0.25	\$800.00	\$200.00
10/07/2020	Johanna Pitcairn	Litigation Support		72	0.50	\$400.00	\$200.00
10/07/2020	Jose Echegaray	Case Managers		72	0.75	\$350.00	\$262.50
10/07/2020	Jose Echegaray	Case Managers		72	2.50	\$350.00	\$875.00
10/07/2020	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
10/08/2020	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
10/09/2020	Johanna Pitcairn	Litigation Support		72	1.00	\$400.00	\$400.00
10/10/2020	Johanna Pitcairn	Litigation Support		72	2.50	\$400.00	\$1,000.00
10/13/2020	Johanna Pitcairn	Litigation Support		72	0.50	\$400.00	\$200.00
10/13/2020	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
10/13/2020	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
10/13/2020	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
10/13/2020	Mahiri Buffong	Managing Clerk		72	0.50	\$375.00	\$187.50
10/14/2020	Jose Echegaray	Case Managers		72	1.75	\$350.00	\$612.50
10/14/2020	Jose Echegaray	Case Managers		72	0.75	\$350.00	\$262.50

10/14/2020	Jose Echegaray	Case Managers		72	0.75	\$350.00	\$262.50
10/14/2020	Mahiri Buffong	Managing Clerk		72	0.50	\$375.00	\$187.50
10/15/2020	Johanna Pitcairn	Litigation Support		72	0.25	\$400.00	\$100.00
10/16/2020	Johanna Pitcairn	Litigation Support		72	4.00	\$400.00	\$1,600.00
10/19/2020	Johanna Pitcairn	Litigation Support		72	1.00	\$400.00	\$400.00
10/19/2020	Jose Echegaray	Case Managers		72	1.00	\$350.00	\$350.00
10/20/2020	Jose Echegaray	Case Managers		72	3.50	\$350.00	\$1,225.00
10/20/2020	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
10/21/2020	Johanna Pitcairn	Litigation Support		72	1.00	\$400.00	\$400.00
10/21/2020	Jose Echegaray	Case Managers		72	1.50	\$350.00	\$525.00
10/21/2020	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
10/21/2020	Mahiri Buffong	Managing Clerk		72	0.50	\$375.00	\$187.50
10/22/2020	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
10/23/2020	Johanna Pitcairn	Litigation Support		72	2.00	\$400.00	\$800.00
10/26/2020	Preya Rodriguez	Paralegal		72	0.75	\$325.00	\$243.75
10/27/2020	Johanna Pitcairn	Litigation Support		72	1.50	\$400.00	\$600.00
10/29/2020	Johanna Pitcairn	Litigation Support		72	2.00	\$400.00	\$800.00
10/30/2020	Preya Rodriguez	Paralegal		72	7.25	\$325.00	\$2,356.25
11/02/2020	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
11/02/2020	Preya Rodriguez	Paralegal		72	5.00	\$325.00	\$1,625.00
11/03/2020	Johanna Pitcairn	Litigation Support		72	3.00	\$400.00	\$1,200.00
11/04/2020	Jose Echegaray	Case Managers		72	0.75	\$350.00	\$262.50
11/04/2020	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75

11/05/2020	Johanna Pitcairn	Litigation Support		72	4.00	\$400.00	\$1,600.00
11/07/2020	Johanna Pitcairn	Litigation Support		72	7.00	\$400.00	\$2,800.00
11/07/2020	Stephen Imundo	Senior Staff Attorneys		72	3.25	\$425.00	\$1,381.25
11/09/2020	Johanna Pitcairn	Litigation Support		72	0.50	\$400.00	\$200.00
11/10/2020	Johanna Pitcairn	Litigation Support		72	2.00	\$400.00	\$800.00
11/10/2020	Preya Rodriguez	Paralegal		72	4.00	\$325.00	\$1,300.00
11/11/2020	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
11/11/2020	Preya Rodriguez	Paralegal		72	2.00	\$325.00	\$650.00
11/12/2020	Johanna Pitcairn	Litigation Support		72	0.25	\$400.00	\$100.00
11/12/2020	Johanna Pitcairn	Litigation Support		72	0.50	\$400.00	\$200.00
11/12/2020	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
11/12/2020	Preya Rodriguez	Paralegal		72	2.00	\$325.00	\$650.00
11/16/2020	Johanna Pitcairn	Litigation Support		72	4.00	\$400.00	\$1,600.00
11/16/2020	Jose Echegaray	Case Managers		72	0.50	\$350.00	\$175.00
11/16/2020	Preya Rodriguez	Paralegal		72	5.00	\$325.00	\$1,625.00
11/17/2020	Johanna Pitcairn	Litigation Support		72	1.00	\$400.00	\$400.00
11/17/2020	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
11/19/2020	Johanna Pitcairn	Litigation Support		72	0.50	\$400.00	\$200.00
11/20/2020	Johanna Pitcairn	Litigation Support		72	0.25	\$400.00	\$100.00
11/24/2020	Johanna Pitcairn	Litigation Support		72	1.00	\$400.00	\$400.00
11/24/2020	Preya Rodriguez	Paralegal		72	6.00	\$325.00	\$1,950.00
11/25/2020	Johanna Pitcairn	Litigation Support		72	2.00	\$400.00	\$800.00

11/25/2020	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
11/27/2020	Johanna Pitcairn	Litigation Support		72	0.50	\$400.00	\$200.00
12/01/2020	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
12/03/2020	Mahiri Buffong	Managing Clerk		72	0.50	\$375.00	\$187.50
12/03/2020	Preya Rodriguez	Paralegal		72	5.00	\$325.00	\$1,625.00
12/04/2020	Johanna Pitcairn	Litigation Support		72	2.25	\$400.00	\$900.00
12/04/2020	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
12/04/2020	Preya Rodriguez	Paralegal		72	6.75	\$325.00	\$2,193.75
12/09/2020	Johanna Pitcairn	Litigation Support		72	1.00	\$400.00	\$400.00
12/11/2020	Johanna Pitcairn	Litigation Support		72	0.25	\$400.00	\$100.00
12/11/2020	Preya Rodriguez	Paralegal		72	3.00	\$325.00	\$975.00
12/14/2020	Johanna Pitcairn	Litigation Support		72	4.00	\$400.00	\$1,600.00
12/14/2020	Preya Rodriguez	Paralegal		72	7.00	\$325.00	\$2,275.00
12/15/2020	Johanna Pitcairn	Litigation Support		72	2.00	\$400.00	\$800.00
12/15/2020	Mahiri Buffong	Managing Clerk		72	0.25	\$375.00	\$93.75
12/17/2020	Johanna Pitcairn	Litigation Support		72	2.50	\$400.00	\$1,000.00
12/22/2020	Johanna Pitcairn	Litigation Support		72	1.00	\$400.00	\$400.00
12/23/2020	Johanna Pitcairn	Litigation Support		72	1.25	\$400.00	\$500.00
12/28/2020	Johanna Pitcairn	Litigation Support		72	2.00	\$400.00	\$800.00
12/31/2020	Mahiri Buffong	Managing Clerk		72	0.50	\$375.00	\$187.50
01/06/2021	Ryan Dykhous	Associate		72	0.25	\$425.00	\$106.25
01/27/2021	Jose Echegaray	Case Managers		72	0.25	\$350.00	\$87.50
03/23/2021	Richard Gluck	Senior Counsel		72	0.50	\$800.00	\$400.00

03/25/2021	Preya Rodriguez	Paralegal		72	3.00	\$325.00	\$975.00
			TOTALS FOR PROJECT #72:		298.50		\$112,603.75
			GRAND TOTALS:		43,250.00		\$20,028,151.25

Exhibit 8

EXHIBIT 8

SEB Inv. Mgmt. AB v. Symantec Corp.,
Case No. 3:18-cv-02902-WHA

LEAD COUNSEL'S EXPENSES BY CATEGORY

CATEGORY	AMOUNT
Court Fees	\$1,693.00
Service of Process	\$3,896.50
On-Line Factual Research	\$37,020.92
On-Line Legal Research	\$49,051.69
Document Hosting & Management and Litigation Support	\$39,247.92
Telephone	\$2,388.67
Postage & Express Mail	\$5,366.09
Hand Delivery Charges	\$870.20
Local Transportation	\$5,152.32
Internal Copying and Printing	\$14,336.80
Outside Copying and Printing	\$24,015.42
Working Meals	\$5,556.36
Out-of-Town Travel (see Ex. 9 for details)	\$25,972.88
Court Reporting & Transcripts	\$116,788.37
Experts and Consultants (see Ex. 10 for details)	\$1,656,966.55
Special Counsel (independent counsel for certain former Symantec employees) (Calcani & Kanasky LLP)	\$11,885.00
TOTAL EXPENSES:	\$2,000,208.69

Exhibit 9

EXHIBIT 9

SEB Inv. Mgmt. AB v. Symantec Corp.,
Case No. 3:18-cv-02902-WHA

DETAILS OF TRAVEL EXPENSES

BLB&G seeks reimbursement of \$25,972.88 in travel costs incurred in connection with travel by Lead Counsel and representatives of Lead Plaintiff, including travel to attend Court hearings on the lead plaintiff motion, the motions to dismiss, and the motion to amend the complaint, as well as a status conference; travel for Lead Plaintiff to conduct interviews with prospective lead counsel in New York; and travel for three depositions conducted in person, before the Covid-19 pandemic caused the remainder of depositions to be conducted remotely.

Air Transportation for Lead Counsel's travel is at coach rates. Lodging charges per night are capped at \$350; and meals while travelling are capped at \$20 per person for breakfast, \$25 per person for lunch, and \$50 per person for dinner. The following provides a summary of the expenses organized by trip.

<u>Attorney or Client Representative</u>	<u>Date</u>	<u>Flight Details</u>	<u>Purpose</u>	<u>Amount</u>
Hans Ek, SEB Deputy CEO	8/22/2018 - 8/23/2018	Stockholm, Sweden to San Francisco, CA (and return)	Court hearing on Lead Plaintiff motion	\$1,250.00
Air Transportation				\$900.00
Lodging	1 night			\$350.00
Hans Ek, SEB Deputy CEO	9/16/2018 - 9/17/2018	Stockholm, Sweden to New York, NY (and return)	Lead Plaintiff interviews with prospective Lead Counsel firms	\$1,700.00
Air Transportation				\$1,350.00
Lodging	1 night			\$350.00
Mona Hall, Legal Counsel at SEB	9/16/2018 - 9/17/2018	Stockholm, Sweden to New York, NY (and return)	Lead Plaintiff interviews with prospective Lead Counsel firms	\$1,700.00
Air Transportation				\$1,350.00
Lodging	1 night			\$350.00

David Stickney	1/29/2019 - 2/1/2019	San Diego, CA to San Francisco, CA (and return)	Court hearing on motions to dismiss	\$833.50
Air Transportation				\$539.96
Meals				\$150.00
Taxis				\$47.54
Airport Parking				\$96.00
Lucas Gilmore	1/30/2019 - 1/31/2019	San Diego, CA to San Francisco, CA (and return)	Court hearing on motions to dismiss	\$1,192.39
Air Transportation				\$503.96
Lodging	1 night			\$350.00
Meals				\$65.76
Taxis				\$192.67
Airport Parking				\$64.00
In-flight WiFi				\$16.00
Mona Hall, Legal Counsel at SEB	1/29/2019 - 1/31/2019	Stockholm, Sweden to San Francisco, CA (and return)	Court hearing on motions to dismiss	\$1,734.00
Air Transportation				\$1,034.00
Lodging	2 nights			\$700.00
Salvatore Graziano	9/25/2019 - 9/26/2019	Chicago, IL to San Francisco, CA (and return to New York, NY)	Court hearing on motion to amend complaint	\$1,754.64
Air Transportation				\$978.56
Lodging	1 night			\$350.00
Meals				\$61.31
Ground Transportation				\$178.27
Travel Agent Fees				\$180.00
In-flight WiFi				\$6.50

Jeremy Robinson	9/25/2019 - 9/26/2019	New York, NY to San Francisco, CA (and return)	Court hearing on motion to amend complaint	\$2,482.64
Air Transportation				\$1,597.00
Lodging	1 night			\$350.00
Meals				\$236.33
Ground Transportation				\$173.31
Travel Agent Fees				\$90.00
In-flight WiFi				\$36.00
Caroline Rifall, Head of Legal at SEB	1/4/2020 - 1/5/2020	Stockholm, Sweden to New York, NY (and return)	Deposition of Caroline Rifall (Head of Legal at SEB)	\$1,700.00
Air Transportation				\$1,350.00
Lodging	1 night			\$350.00
Mona Hall, Legal Counsel at SEB	1/4/2020 - 1/5/2020	Stockholm, Sweden to New York, NY (and return)	Deposition of Caroline Rifall (Head of Legal at SEB)	\$1,700.00
Air Transportation				\$1,350.00
Lodging	1 night			\$350.00
Jeremy Robinson	2/6/2020 - 2/7/2020	New York, NY to Miami, FL (and return)	Deposition of Michael Hartzmark (Plaintiffs' Class Certification Expert)	\$1,275.85
Air Transportation				\$489.61
Lodging	1 night			\$350.00
Meals				\$268.98
Ground Transportation				\$61.26
Travel Agent Fees				\$90.00
In-flight WiFi				\$16.00

R. Ryan Dykhous	2/6/2020 - 2/7/2020	New York, NY to Miami, FL (and return)	Deposition of Michael Hartzmark (Plaintiffs' Class Certification Expert)	\$964.97
Air Transportation				\$326.80
Lodging	1 night			\$350.00
Meals				\$50.00
Ground Transportation				\$193.17
Travel Agent Fees				\$45.00
Jeremy Robinson	2/12/2020 - 2/14/2020	New York, NY to San Francisco, CA (and return)	Court Hearing/Status Conference	\$2,424.17
Air Transportation				\$1,598.00
Lodging	1 night			\$350.00
Meals				\$154.99
Ground Transportation				\$133.21
Travel Agent Fees				\$135.00
In-flight/Lodging WiFi				\$52.97
Rebecca Boon	2/12/2020 - 2/14/2020	New York, NY to San Francisco, CA (and return)	Court Hearing/Status Conference	\$2,752.24
Air Transportation				\$1,598.00
Lodging	2 nights			\$700.00
Meals				\$237.99
Ground Transportation				\$60.26
Travel Agent Fees				\$135.00
In-flight WiFi				\$20.99

Jeremy Robinson	5/5/2020 - 5/6/2020	New York, NY to Chicago, IL (and return)	Deposition of Douglas Skinner (Defendants' Class Certification Expert)	\$1,344.32
Air Transportation				\$557.81
Lodging	1 night			\$344.00
Meals				\$170.59
Ground Transportation				\$173.02
Travel Agent Fees				\$45.00
In-flight/Lodging WiFi				\$53.90
R. Ryan Dykhous	5/5/2020 - 5/6/2020	New York NY to Chicago, IL (and return)	Deposition of Douglas Skinner (Defendants' Class Certification Expert)	\$1,164.16
Air Transportation				\$597.80
Lodging	1 night			\$346.33
Meals				\$81.80
Ground Transportation				\$93.23
Travel Agent Fees				\$45.00
			TOTAL FOR TRAVEL:	\$25,972.88

Exhibit 10

EXHIBIT 10

SEB Inv. Mgmt. AB v. Symantec Corp.,
Case No. 3:18-cv-02902-WHA

**ADDITIONAL DETAILS CONCERNING
EXPERT AND EXPERT CONSULTANT EXPENSES**

Total of Testifying and Consulting Expert Expenses: \$1,656,966.55

As detailed below, each of the testifying and consulting experts retained by Plaintiffs was important and necessary to their effort to prove Lead Plaintiff's and the Class's securities fraud claims, which concerned alleged accounting manipulations tied to executive bonus targets and alleged damages suffered by Class members who purchased or otherwise acquired publicly traded Symantec common stock during the Class Period (*i.e.*, May 11, 2017 through August 2, 2018, inclusive). To be sure, Defendants likewise retained and proffered opinions from experts in the fields of accounting, damages, and executive compensation.

Accounting Testifying Expert: Andrew M. Mintzer, CPA/CFF, CFE (\$824,340.75)

Lead Plaintiff retained as a testifying expert forensic accountant Andrew Mintzer, who is employed by Hemming Morse LLP, to analyze and provide expert opinions concerning Symantec's accounting practices and compliance with GAAP or applicable rules, regulations, and guidance, including SEC rules regulations and guidance, during the Class Period. In particular, Mr. Mintzer and his team of experienced accounting professionals analyzed, and Mr. Mintzer provided opinions regarding, Symantec's classifications of transition and transformation ("T&T") expenses, use of non-GAAP financial measures, reported revenues and revenue recognition from certain transactions, materiality issues and the effectiveness of Symantec's disclosure controls and internal controls over financial reporting.

Mr. Mintzer's colleagues from Hemming Morse LLP assisted Lead Counsel in preparing the Consolidated Complaint, responding to issues raised in connection with Defendants' motion to dismiss, and preparing the Amended Complaint and moving for leave to amend. Also, in

connection with conducting discovery, the settlement conferences and negotiations, and generally throughout the litigation, Mr. Mintzer and his team also helped Lead Counsel review, analyze, and understand Symantec's internal accounting records and practices, KPMG's audit workpapers, and the work performed by Ernst & Young in evaluating Symantec's use of non-GAAP measures. Mr. Mintzer also prepared an 82-page expert report, accompanied by extensive citations to the record and multiple schedules and exhibits, in which he analyzed and opined concerning Symantec's classification of T&T expenses and reported non-GAAP measures, the materiality of the revenue from the Oracle transaction that Symantec improperly recognized, and Symantec's disclosure controls and internal controls over financial reporting. Mr. Mintzer also prepared a 25-page reply report, accompanied by extensive citations to the record and multiple appendices and exhibits, responding to the opinions expressed by Defendants' accounting expert. Mr. Mintzer also prepared and sat for a full-day deposition on March 2, 2021.

Executive Compensation Testifying Expert: Professor Wayne Guay (\$388,036.00)

Lead Plaintiff retained as a testifying expert Professor Wayne Guay, Ph.D., the Yageo Professor of Accounting at The Wharton School of Business at the University of Pennsylvania, to analyze and provide expert opinions concerning Symantec's incentive compensation plans. Dr. Guay was assisted by a team of research staff at Charles River Associates. In particular, Dr. Guay and his team analyzed, and Dr. Guay provided opinions regarding, Symantec's multiple incentive compensation plans and how they related to financial performance metrics, including non-GAAP operating income, how certain of Symantec's incentive compensation plans compared to other Symantec incentive plans and to incentive plans of its peer companies, and the impact on the incentive compensation payouts that certain Symantec executives would have received absent the allegedly improper T&T expense classifications.

In connection with conducting discovery, the settlement conferences and negotiations, and generally throughout the litigation, Dr. Guay and his team helped Lead Counsel review, analyze, and understand Symantec's incentive compensation plans. Dr. Guay prepared a 43-page opening

report, accompanied by extensive citations to the record and multiple exhibits and appendices, in which he opined regarding Symantec's incentive compensation plans, including their relevant metrics, how they compared to other plans, including those of Symantec's peer companies, and the impact that the allegedly improper T&T expenses had on the incentive payouts of top Symantec executives, including Defendant Clark (former CEO), the former CFO and the former COO. Dr. Guay also prepared a 15-page reply report, which included extensive citations to the record, in which he responded to the opinions of Defendants' executive-compensation expert. Dr. Guay also prepared and sat for a full-day deposition on February 24, 2021.

Damages/Loss Causation Testifying Expert: Dr. Michael Hartzmark, Ph.D. (\$404,777.30)

Lead Plaintiff retained as a testifying expert financial economics expert, Dr. Michael Hartzmark, Ph. D. of Hartzmark Economics Litigation Practice, to provide expert opinions in the areas of damages, loss causation, and market efficiency. Dr. Hartzmark provided expert analysis and advice throughout the litigation working with his team of economists and financial analysts. In support of Lead Plaintiff's motion for class certification, he submitted an opening report in which he opined on whether Symantec's common stock traded in an efficient market during the Class Period, and whether damages for Lead Plaintiff's and the Class's securities fraud claims could be calculated on a class-wide basis using a common methodology applicable to all Class Members. Also in connection with class certification, Dr. Hartzmark submitted a reply report responding to Defendants' class certification expert and his effort to rebut Dr. Hartzmark's opening report. Next, Dr. Hartzmark prepared and sat for a deposition regarding class certification matters on February 7, 2020.

In connection with merits expert discovery, Dr. Hartzmark prepared a 105-page opening damages report, which included extensive citations to the record and multiple appendices, in which he opined on a multitude of issues concerning damages and loss causation, including the economic materiality of Defendants' alleged misrepresentations, whether those alleged misrepresentations proximately caused artificial inflation in the price of Symantec's common stock and proximately

caused investors to suffer damages when the alleged truth was revealed, the quantum of per share damages proximately caused by the alleged misrepresentations, and the Class-wide methodologies for calculating damages per share for Lead Plaintiff's claims under Sections 10(b) and 20A of the Exchange Act. Dr. Hartzmark also prepared a 51-page reply report, which included extensive citations to the record, in which he responded to the challenges to his opinions raised by Defendants' damages expert. Dr. Hartzmark also prepared and sat for a full-day merits deposition on February 25, 2021. Further, one of the economists on Dr. Hartzmark's team was available for discussion and consultation during the second settlement conference supervised by Judge Ryu, which took place in May 2021, after the exchange of expert reports on damages. Dr. Hartzmark and his team also assisted in preparing the proposed Plan of Allocation.

Damages Consulting Expert: Chad Coffman, Global Economics Group LLC (\$39,812.50)

Lead Plaintiff retained as a consulting expert financial economist Chad Coffman of Global Economics Group LLC to serve as consulting expert on damages and loss causation issues. In particular, Mr. Coffman and his team of economists and financial analysts assisted Plaintiffs in understanding and analyzing damages and loss causation in connection with the preparation of the Consolidated Complaint. Lead Counsel also consulted with Mr. Coffman and his team in connection with preparing for—and following up on—the initial settlement conference supervised by Judge Ryu, which was conducted in September 2020 prior to the exchange of expert reports on damages.

Exhibit 11

CORNERSTONE RESEARCH

Economic and Financial Consulting and Expert Testimony

Securities Class Action Filings

2020 Year in Review

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Executive Summary

As courts and firms sought to adapt to operating in a worldwide pandemic, the total number of securities class action filings fell below 400—to 334—for the first time since 2016.

Despite the lower filing activity, market capitalization losses were comparable to the elevated levels seen over the past three years and were driven by several mega filings.

Number and Size of Filings

- Plaintiffs filed 334 **new class action securities cases** (filings) across federal and state courts in 2020, a 22% decline from 427 in 2019. The 2020 total, however, is still 49% higher than the 1997–2019 average. “Core” filings—those excluding M&A filings—fell 12% to 234. (page 5)
- Federal and state court class actions alleging **claims under the Securities Act of 1933** (1933 Act) fell dramatically in the fourth quarter of 2020, contributing to the overall reduction in filings. (page 21)
- **Disclosure Dollar Loss (DDL)** decreased by 13% to \$245 billion in 2020. (pages 8–9)
- **Maximum Dollar Loss (MDL)** increased by 33% to \$1,584 billion due to several mega filings. (page 10)
- Although the number of **mega DDL filings** increased from eight in 2019 to 13 in 2020, total DDL from mega filings decreased by \$1 billion. There were 30 **mega MDL filings** in 2020, more than twice the historical average. (page 31)

Other Measures of Filing Intensity

- The percentage of **U.S. exchange-listed companies** subject to filings decreased for the first time in eight years, from a record high of 8.9% in 2019 to 6.3% in 2020. (page 12)
- 4.4% of **S&P 500** companies were defendants in a core federal filing during 2020, the lowest percentage since 2015. (pages 13–14)
- Monthly filing activity in 2020 had very large fluctuations, with both the lowest (November) and highest (April) monthly totals of core filings in the last three years. (page 6)

Class action securities filing activity in 2020 fell 22% from 2019.

Figure 1: Federal and State Class Action Filings Summary

(Dollars in Billions)

	Annual (1997–2019)			2019	2020
	Average	Maximum	Minimum		
Class Action Filings	224	427	120	427	334
Core Filings	190	267	120	267	234
Disclosure Dollar Loss (DDL)	\$136	\$331	\$42	\$282	\$245
Maximum Dollar Loss (MDL)	\$662	\$2,046	\$145	\$1,187	\$1,584

Note: This figure presents data on a combined federal and state filings basis. Filings in federal courts may have parallel cases filed in state courts. When parallel cases are filed in different years, only the earlier filing is reflected in the figure above. Filings against the same company brought in different states without a filing brought in federal court are counted as unique state filings. As a result, this figure's filing counts may not match those in Figures 18, 21, 27, 31, or 32.

Key Trends in Federal Filings

The percentage of U.S. exchange-listed companies subject to filings experienced the largest one-year drop on record. Core filings in federal courts against non-U.S. issuers (i.e., companies headquartered outside the U.S. with securities trading on U.S. exchanges) reached record levels.

U.S. Companies

- In 2020, the likelihood of core filings and M&A filings targeting **U.S. exchange-listed companies** dropped to their lowest combined level since 2016. [\(page 12\)](#)
- Core federal filings against **S&P 500 firms** in 2020 occurred at a rate of 4.4%, falling below the 2001–2019 average of 5.5%. [\(page 13\)](#)

Non-U.S. Companies

- Core federal filings against **non-U.S. companies** rose to 74, the highest level on record. [\(page 28\)](#)
- The likelihood of a core federal filing against a non-U.S. company surpassed the likelihood of such a filing against an S&P 500 company, largely driven by a decrease in likelihood of filings against S&P 500 companies. [\(page 30\)](#)

By Industry

- The majority of sectors saw a similar number of core federal filings in 2020 as in 2019. [\(page 32\)](#)
- 2020 core federal filings in the **Consumer Non-Cyclical**, **Communications**, and **Industrial** categories were lower than 2019 numbers. [\(page 32\)](#)

By Circuit

- There were 77 and 79 core federal filings in the **Second** and **Ninth Circuits**, respectively. Ninth Circuit core federal filings were the highest on record for that circuit. [\(page 33\)](#)
- Core federal filings in the **First Circuit** were the lowest on record with just two filings in 2020 compared with the 1997–2019 historical average of nine. [\(page 33\)](#)

M&A Filings

- Federal filings of **M&A class actions**—those involving M&A transactions with Section 14 claims but no Rule 10b-5, Section 11, or Section 12(a) claims—decreased again, from 160 in 2019 to 100 in 2020. [\(page 5\)](#)
- M&A filings continued to be concentrated in the **Third Circuit**. In 2020, 86% of M&A filings were filed in Delaware courts. [\(page 15\)](#)
- M&A filings had a much higher rate of dismissal (90%) than core federal filings (47%) from 2010 to 2019. [\(page 17\)](#)

Dismissal Rates by Plaintiffs' Counsel

- Complaints filed by the **three plaintiff law firms** that have most frequently filed first identified complaints have higher dismissal rates than those filed by other plaintiffs' counsel. [\(page 34\)](#)

Federal Filing Lag

- The median **filing lag** has remained higher than the 1997–2019 median, but is much lower for the three plaintiff law firms that have most frequently filed first identified complaints. [\(page 27\)](#)

New Developments

- Four California trial courts have followed the Delaware Supreme Court's decision in *Salzberg v. Sciabacucchi* (*Sciabacucchi*) enforcing federal forum-selection provisions in corporate charters. [\(page 35\)](#)
- The SEC's Division of Corporation Finance issued "CF Disclosure Guidance: Topic No. 10," which identified disclosure considerations for China-based companies that list on U.S. exchanges. [\(page 35\)](#)
- The explosion of IPOs involving special purpose acquisition companies (SPACs) in 2020 may lead to a higher number of Section 11 filings in 2021 and beyond. [\(page 35\)](#)

Featured: Annual Rank of Filing Intensity

Filing activity in 2020 declined dramatically from the record high filing counts observed in 2019. M&A filings have continued to decline since reaching their peak in 2017, but were also lower in 2020 than in the two previous years due to fewer large mergers.¹ Core filings in state courts have also fallen sharply, likely in response to the Delaware Supreme Court ruling in *Sciabacucchi*.

Core federal filings against companies in the S&P 500 index occurred with much lower frequency than in 2019, falling below the 2001–2019 average. Maximum Dollar Loss (MDL) reached its highest point since 2002. Disclosure Dollar Loss (DDL) remained elevated as well, but fell from the record highs seen in 2018–2019.

Figure 2: Annual Rank of Measurements of Federal and State Filing Intensity

	2018	2019	2020
Number of Total Filings	2nd	1st	4th
Core Filings	3rd	1st	4th
M&A Filings	2nd	3rd	4th
Size of Core Filings			
Disclosure Dollar Loss	1st	2nd	3rd
Maximum Dollar Loss	4th	5th	2nd
Percentage of U.S. Exchange-Listed Companies Sued			
Total Filings	2nd	1st	4th
Core Filings	2nd	1st	3th
Percentage of S&P 500 Companies Subject to Core Federal Filings	2nd	4th	14th

Note: Rankings cover 1997 through 2020 with the exceptions of M&A filings, which have been tracked as a separate category since 2009, and analysis of the litigation likelihood of S&P 500 companies, which began in 2001. M&A filings are securities class actions filed in federal courts that have Section 14 claims, but no Rule 10b-5, Section 11, or Section 12(a) claims, and involve merger and acquisition transactions. Core filings are all state 1933 Act class actions and all federal securities class actions excluding those defined as M&A filings. 1933 Act filings brought in state courts are included in the rankings in all categories beginning in 2010, except the Percentage of S&P 500 Companies Subject to Core Federal Filings.

1. The number of non-withdrawn mergers over \$100 million with a public company target whose shares or American depository receipts (ADRs) traded on a U.S. exchange fell from approximately 140 with announcement dates in 2019 to fewer than 100 with announcement dates in 2020.

Featured: State Court 1933 Act Filings

State court securities class action filings with 1933 Act claims decreased substantially in 2020, likely due to the March 2020 Delaware Supreme Court decision in *Sciabacucchi* regarding the validity and enforceability of federal forum-selection provisions in corporate charters. This decline is in sharp contrast to the substantial increase in state 1933 Act securities filings in the last few years, which reached a historic high in 2019.

- The number of state 1933 Act filings in 2020 fell sharply from 53 to 17, particularly in the second half of 2020 when only four filings occurred, likely in response to two factors: (1) the *Sciabacucchi* ruling, and (2) strong stock market performance that makes it less likely that a company's stock price will fall below its price as of the time of the registration statement. (pages 5, 21, 24)
- State 1933 Act filings in California courts continued to decline in 2020 with only four such filings, all but one of which had a parallel action in federal courts.
- New York remained the preferred venue for state 1933 Act filings, with seven of the 10 filings that were only filed in state courts.
- The number of state 1933 Act filings in 2020 dropped by 68% from 2019, reverting to roughly the average level from 2010 through 2019.

The number of state court 1933 Act filings decreased sharply in 2020, likely in response to the Sciabacucchi ruling.

Figure 3: State Court 1933 Act Class Action Filings Summary

	Average 2010–2019	2019	2020
State Court 1933 Act Class Action Filings			
Filings in State Courts Only	8	28	10
California	4	5	1
New York	2	13	7
All Other States	2	10	2
Parallel Filings in State and Federal Courts	9	25	7
Total	16	53	17

Note:

1. This figure presents combined federal and state data. Filings in federal courts may have parallel cases filed in state courts. When parallel cases are filed in different years, only the earlier filing is reflected in the figure above. Filings against the same company brought in different states without a filing brought in federal court are counted as unique state filings. As a result, this figure's filing counts may not match those in Figures 18, 21, 27, 31, or 32.

2. Beginning in 2018, the Securities Class Action Clearinghouse began tracking 1933 Act filings in California state courts containing Section 11 or Section 12 claims; there were six filings in California state courts with only Section 12 claims in 2018. Filings in other state courts are currently only those with Section 11 claims.

3. Figures may not sum due to rounding.

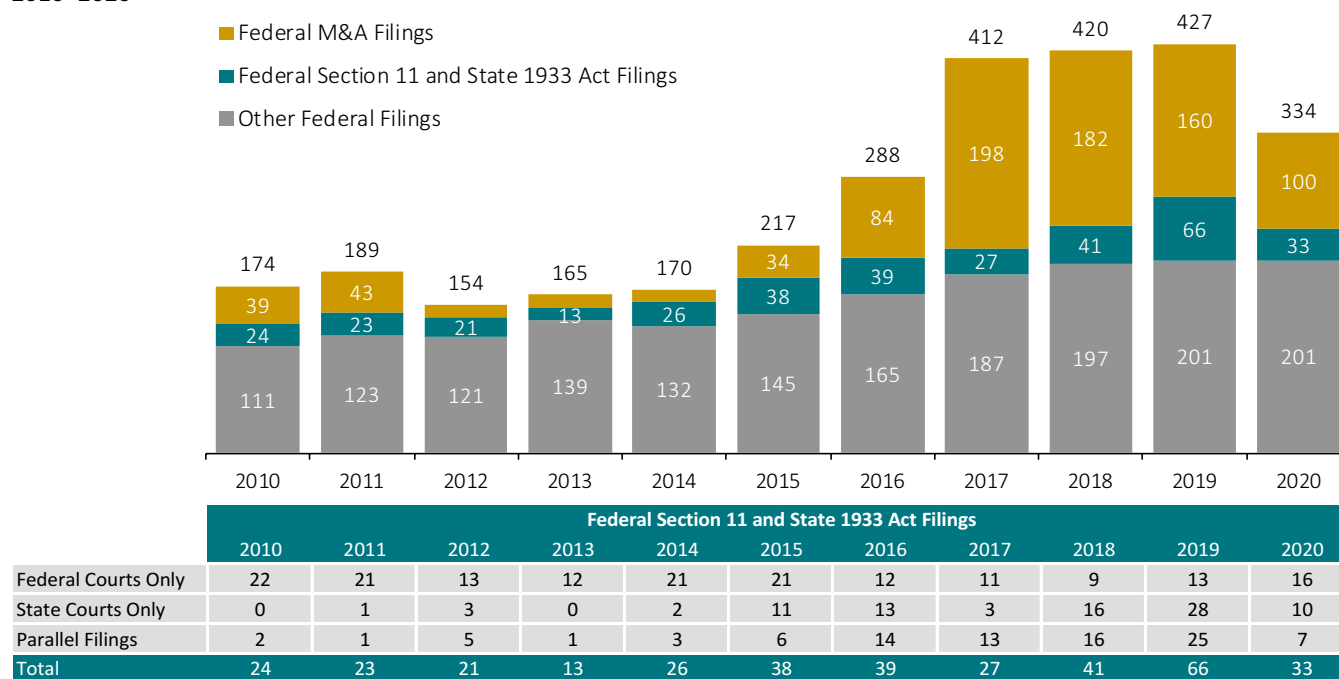
Combined Federal and State Filing Activity

- Plaintiffs filed 334 new securities class actions across federal and state courts, a 20% drop from the 2017–2019 average of 420, but still higher than 2010–2016 levels.

The number of class action filings across federal and state venues dropped largely due to a decline in M&A and state 1933 Act filings.

- The 234 new core securities class actions (consisting of 33 federal Section 11 and state 1933 Act filings, and 201 other federal filings) was only slightly lower than the 2017–2019 average of 240. However, M&A filings fell 38% from 2019.
- Of the 33 federal Section 11 and state 1933 Act filings, only 10 were filed exclusively in state courts—a 64% decrease from 2019.
- 48% of all federal Section 11 and state 1933 Act filings were federal-only filings, compared to 20% in 2019.
- Parallel filings in state and federal courts plummeted from 25 filings in 2019 to seven filings in 2020.

Figure 4: Federal Section 11 and State 1933 Act Class Action Filings by Venue 2010–2020



Source: Cornerstone Research and Stanford Law School Securities Class Action Clearinghouse; Bloomberg Law; Institutional Shareholder Services' Securities Class Action Services (ISS' SCAS)

Note:

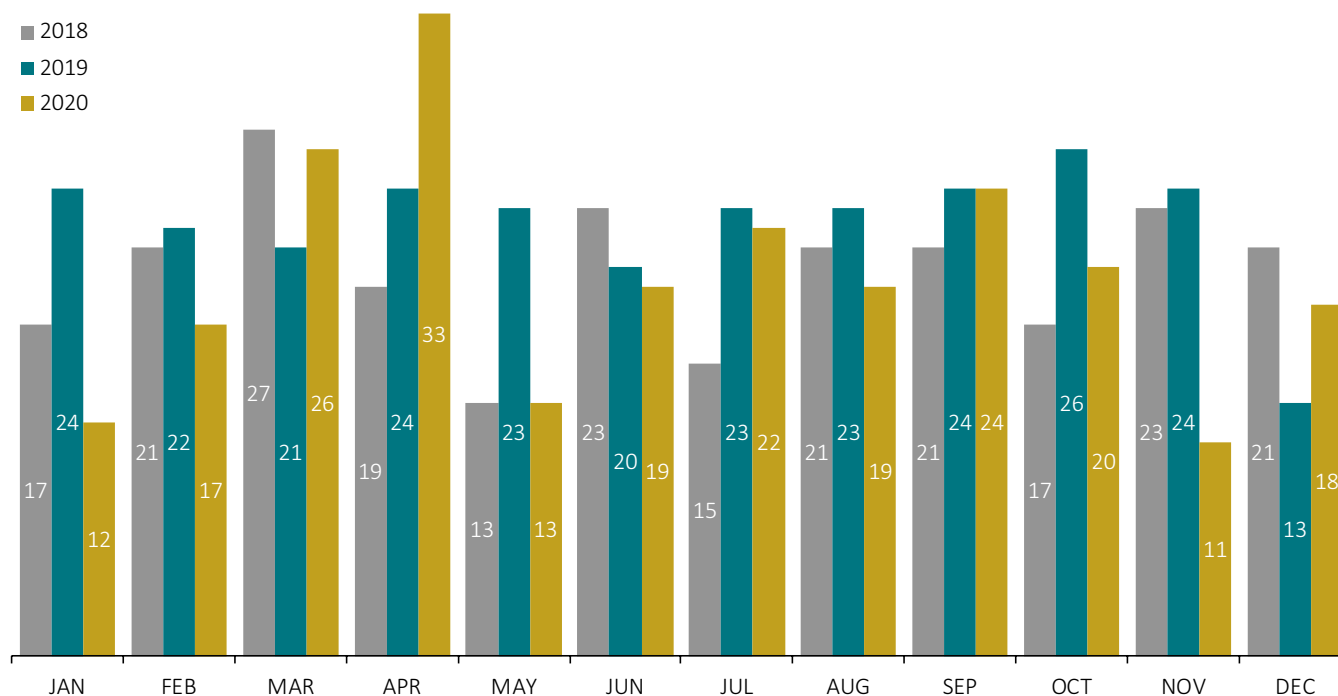
- The federal Section 11 data displayed may contain Rule 10b-5 claims, but state 1933 Act filings do not.
- This figure presents combined federal and state data. Filings in federal courts may have parallel cases filed in state courts. When parallel cases are filed in different years, only the earlier filing is reflected in the figure above. Filings against the same company brought in different states without a filing brought in federal court are counted as unique state filings. As a result, this figure's filing counts may not match those in Figures 18, 21, 27, 31, or 32.
- Beginning in 2018, California state filings may contain either Section 11 or Section 12 claims. Of the 16 filings in California in 2018, six filings contained Section 12 claims without also containing Section 11 claims.

Filing Counts by Month

- After lower filing activity in January, the number of filings steadily increased through April before declining again in May. Filings in June then rebounded to monthly totals higher than those in January and February. From July through October, filings were roughly in line with the monthly number of filings in the past two years, but in November, filings sharply declined to less than half of what they were in 2018 and 2019. The year ended with 18 filings in December, five more than in 2019.
- The peak in April was influenced by the filings on April 3, 2020, of 11 similar securities class actions brought by two law firms against companies that had initial coin offerings or that provided exchanges for the trading of cryptocurrencies.
- Monthly filing activity may generally be explained by stock market performance. Market performance was strong in January and February, followed by a sharp decline in March due to the onset of the COVID-19 pandemic. The S&P 500 index hit its lowest point for the year in late March, but then rose by 68% to finish the year up more than 16% compared to the beginning of the year, despite the pandemic.

Filing activity in 2020 had very large fluctuations, with both the lowest (November) and highest (April) monthly totals of core filings in the last three years.

Figure 5: Number of Core Filings by Month
2018–2020



Note:

- Counts include core filings in federal court and 1933 Act filings in state court. Core filings exclude M&A filings.
- This figure presents combined federal and state data. Filings in federal courts may have parallel cases filed in state courts. When parallel cases are filed in different months, only the earlier filing is reflected in the figure above. Filings against the same company brought in different states without a filing brought in federal court are counted as unique state filings. As a result, this figure's filing counts may not match those in Figures 18, 21, 27, 31, or 32.
- On April 3, 2020, 11 similar securities class actions brought by two law firms were filed against companies that had initial coin offerings or that provided exchanges for the trading of cryptocurrencies.

Summary of Trend Cases

This figure highlights different trends that have appeared in core filing activity in recent years.

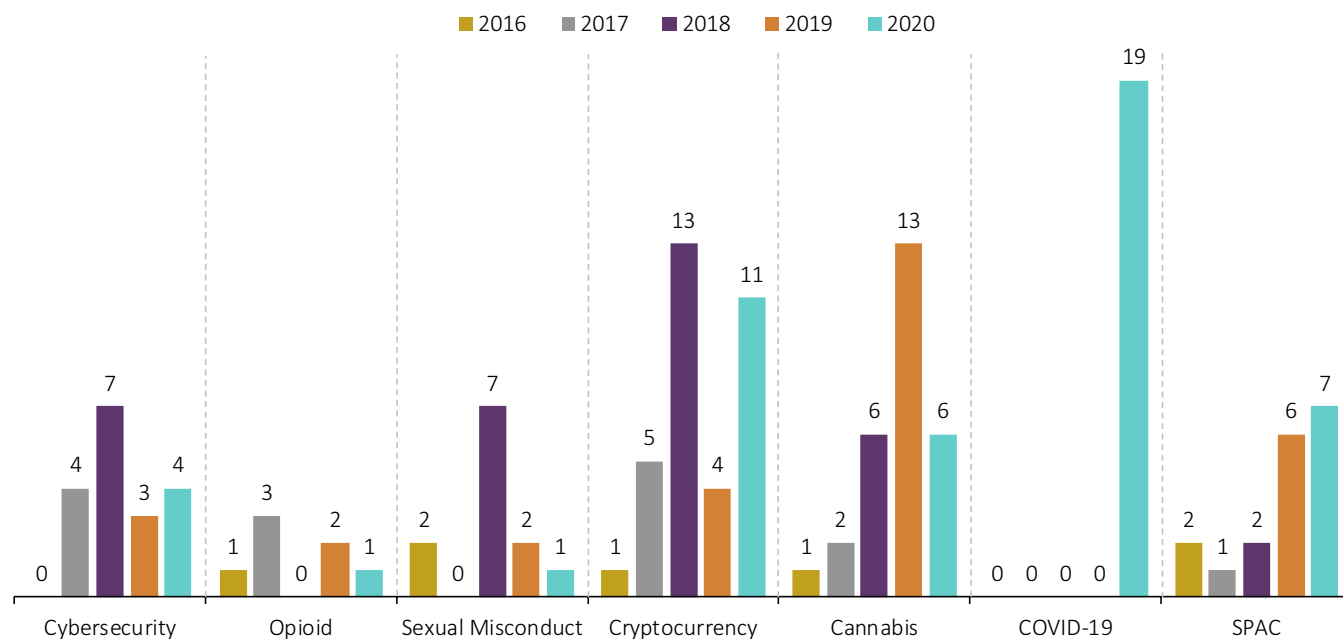
- Cybersecurity filings are those in which allegations relate to data breaches or security vulnerabilities.
- Opioid filings involve allegations related to opiate drugs that are addictive, were falsely marketed as non-addictive, or caused other opiate-related issues.
- Sexual misconduct filings involve allegations of sexual harassment that are central to the claims.
- Cryptocurrency filings include blockchain or cryptocurrency companies that engaged in the sale or exchange of tokens (commonly initial coin offerings), cryptocurrency mining, cryptocurrency derivatives, or that designed blockchain-focused software.
- Cannabis filings include companies financing, farming, distributing, or selling cannabis and cannabidiol products.
- COVID-19 filings include allegations related to companies negatively impacted by the virus or looking to address demand for products as a result of the virus.

- SPAC filings concern companies that went public for the express purpose of acquiring an existing company in the future.

Aside from a flurry of cryptocurrency filings, previous trend cases subsided while COVID-19-related cases surged.

- The most dominant trend in 2020 was COVID-19, with 19 filings. Cryptocurrency was the next most common trend with 11 filings.
- The seven SPAC filings in 2020 represent an upward trend in such filings since 2016 and may continue to rise in response to the explosion of SPAC IPOs in 2020. (pages 23, 35)
- Opioid and sexual misconduct filings continued their downward trend in 2020, both dropping from two to one filing.

Figure 6: Summary of Trend Cases—Core Filings 2016–2020



Source: Cornerstone Research and Stanford Law School Securities Class Action Clearinghouse

Note: There were six filings that appeared in multiple trend categories. SPAC counts include M&A filings. There were two M&A SPAC filings in 2020, five in 2019, and one in 2018. This figure has been updated to reflect new data on SPAC filings.

Market Capitalization Losses for Federal and State Filings

Disclosure Dollar Loss Index® (DDL Index®)

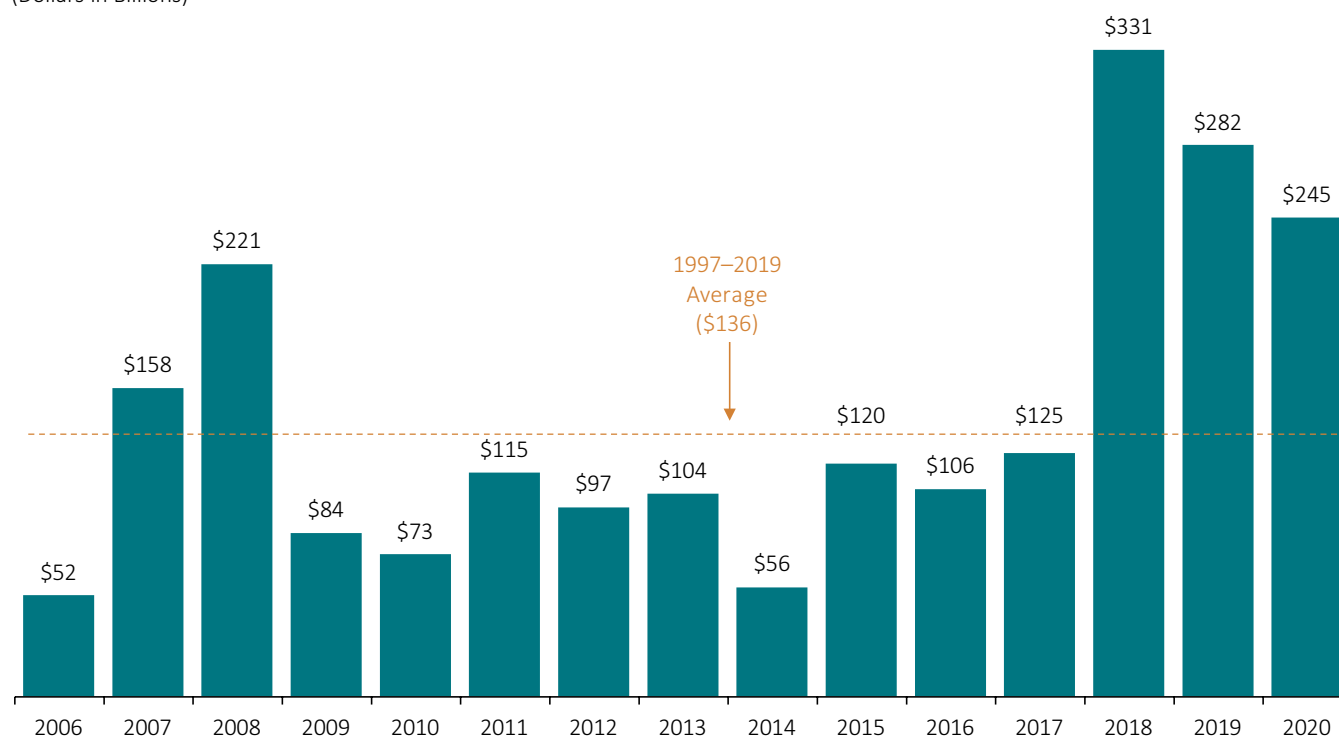
This index measures the aggregate annual DDL for all federal and state filings. DDL is the dollar value change in the defendant firm's market capitalization between the trading day immediately preceding the end of the class period and the trading day immediately following the end of the class period. See the Glossary for additional discussion on market capitalization losses and DDL.

- The DDL Index fell for the second consecutive year to \$245 billion, down 13% from 2019 and 26% from 2018, but remained almost double the 1997–2019 average.
- As shown in Appendix 1, median DDL per filing in 2020 also fell for the second consecutive year, down 14% from last year and 38% from 2018, but remained above 2009–2017 levels and 32% above the 1997–2019 average. See Appendix 1 for DDL totals, averages, and medians from 1997 to 2020.

The DDL Index remained well above historical averages, despite a continued decline from the record high in 2018.

Figure 7: Disclosure Dollar Loss Index® (DDL Index®)
2006–2020

(Dollars in Billions)

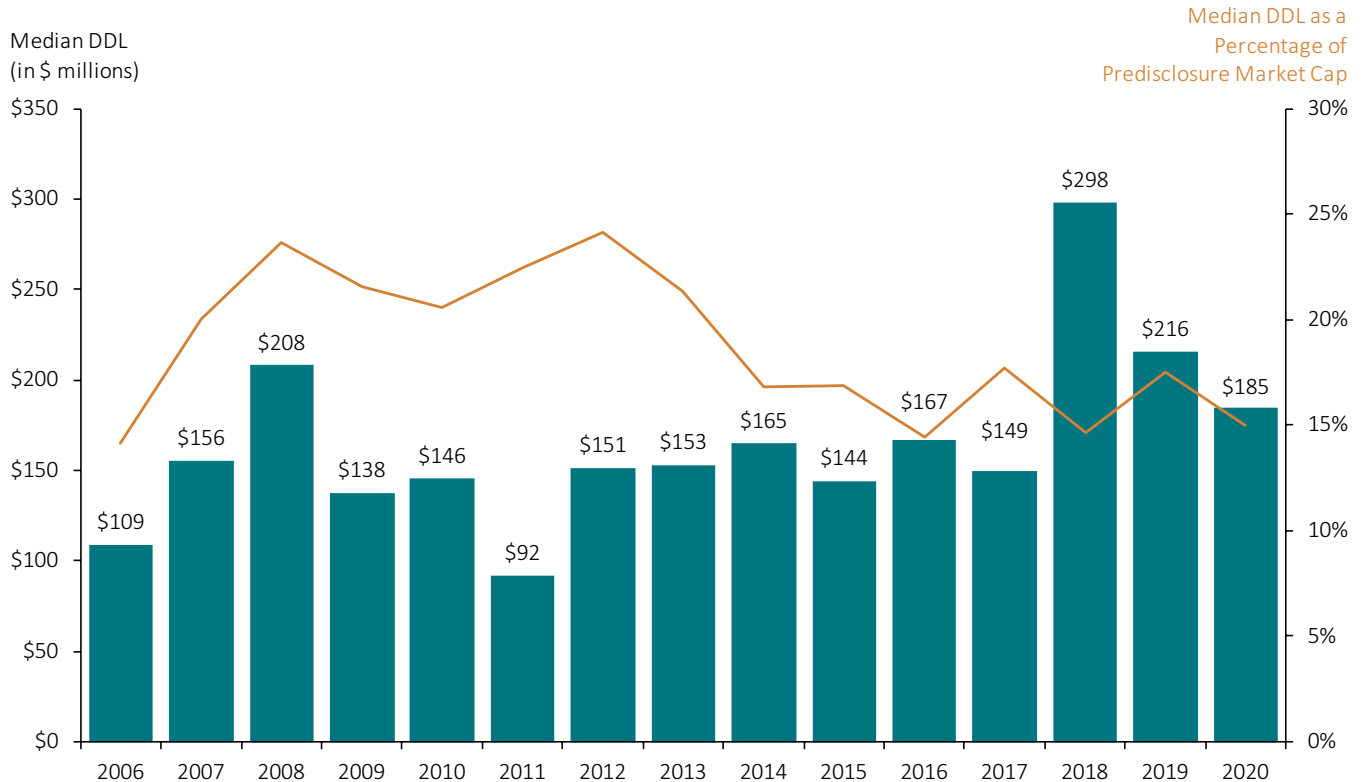


Note: This figure begins including DDL associated with state 1933 Act filings in 2010. DDL associated with parallel class actions is only counted once.

- As shown by the gold line in the figure below, since 2014 the typical (i.e., median) percentage stock price drop at the end of the class period has oscillated between about 15% and 18% of the predisclosure market cap. That measure was 15% in 2020, similar to 2016 and 2018 levels.

Median DDL fell for the second consecutive year while the median value of DDL as a percentage of predisclosure market capitalization continued to oscillate between about 15% and 18%.

Figure 8: Median Disclosure Dollar Loss
 2006–2020



Note: This figure begins including DDL associated with state 1933 Act filings in 2010. DDL associated with parallel class actions is only counted once.

Maximum Dollar Loss Index® (MDL Index®)

This index measures the aggregate annual MDL for all federal and state filings. MDL is the dollar value change in the defendant firm's market capitalization from the trading day with the highest market capitalization during the class period to the trading day immediately following the end of the class period. See the Glossary for additional discussion on market capitalization losses and MDL.

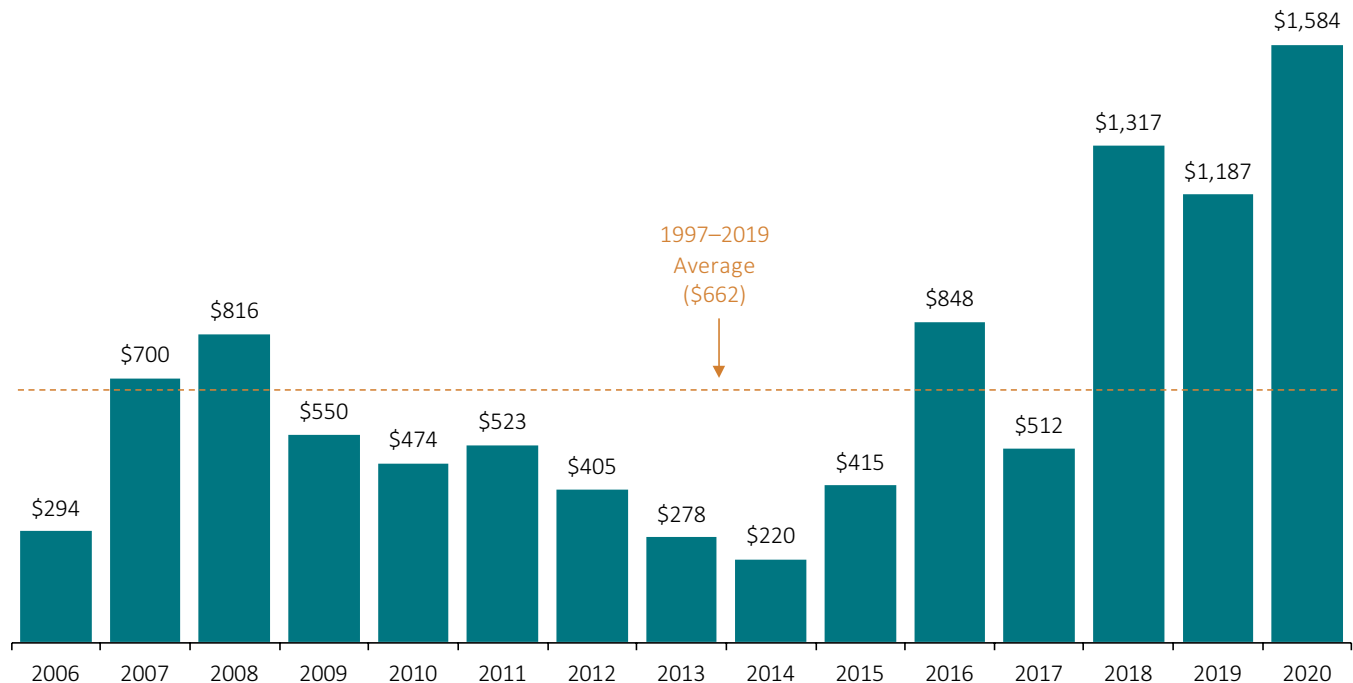
- The MDL Index reached \$1.6 trillion in 2020, the second-largest year on record, trailing only 2002. The 2020 MDL Index is well over twice the historical average. See Appendix 1 for MDL totals, averages, and medians from 1997 to 2020.

- There were 30 mega MDL filings in 2020, which accounted for \$1,309 billion, or 83%, of total MDL (see Figure 30).
- For the third consecutive year, there were at least 20 mega MDL filings, compared to the historical average of 14.

The MDL Index eclipsed \$1 trillion for a third consecutive year.

Figure 9: Maximum Dollar Loss Index® (MDL Index®)
 2006–2020

(Dollars in Billions)



Note: This figure begins including MDL associated with state 1933 Act filings in 2010. MDL associated with parallel class actions is only counted once.

Classification of Federal Complaints

- Only 10% of core federal filings contained a Section 11 claim (down from 16% in 2019).
- Section 12(a) claims increased from 7% of core federal filings in 2019 to 11% in 2020.
- Allegations of misrepresentations in financial documents fell sharply from 98% in 2019 to only 90%, the lowest level over the last five years.
- For the fourth consecutive year, around a quarter of core federal filings included allegations related to accounting violations.

Section 11 claims were asserted in only 10% of core federal filings in 2020, down from 16% in 2019.

- Allegations of announced internal control weaknesses decreased from 10% to 7% of core federal filings.

Figure 10: Allegations Box Score—Core Federal Filings

	Percentage of Filings ¹				
	2016	2017	2018	2019	2020
Allegations in Core Federal Filings²					
Rule 10b-5 Claims	94%	93%	86%	87%	85%
Section 11 Claims	12%	12%	10%	16%	10%
Section 12(a) Claims	6%	4%	10%	7%	11%
Misrepresentations in Financial Documents	99%	100%	95%	98%	90%
False Forward-Looking Statements	45%	46%	48%	47%	43%
Trading by Company Insiders	10%	3%	5%	5%	4%
Accounting Violations ³	30%	22%	23%	23%	27%
Announced Restatement ⁴	10%	6%	5%	8%	5%
Internal Control Weaknesses ⁵	21%	14%	18%	18%	18%
Announced Internal Control Weaknesses ⁶	7%	7%	7%	10%	7%
Underwriter Defendant	7%	8%	8%	11%	9%
Auditor Defendant ⁷	2%	0%	0%	0%	0%

Note:

1. The percentages do not add to 100% because complaints may include multiple allegations.
2. Core federal filings are all federal securities class actions excluding those defined as M&A filings.
3. First identified complaint (FIC) includes allegations of U.S. GAAP violations or violations of other reporting standards such as IFRS. In some cases, plaintiff(s) may not have expressly referenced violations of U.S. GAAP or other reporting standards; however, the allegations, if true, would represent violations of those standards.
4. FIC includes allegations of Accounting Violations and refers to an announcement during or subsequent to the class period that the company will restate, may restate, or has unreliable financial statements.
5. FIC includes allegations of internal control weaknesses over financial reporting.
6. FIC includes allegations of internal control weaknesses and refers to an announcement during or subsequent to the class period that the company has internal control weaknesses over financial reporting.
7. In each of 2018, 2019, and 2020, there was one filing with allegations against an auditor defendant.

U.S. Exchange-Listed Companies

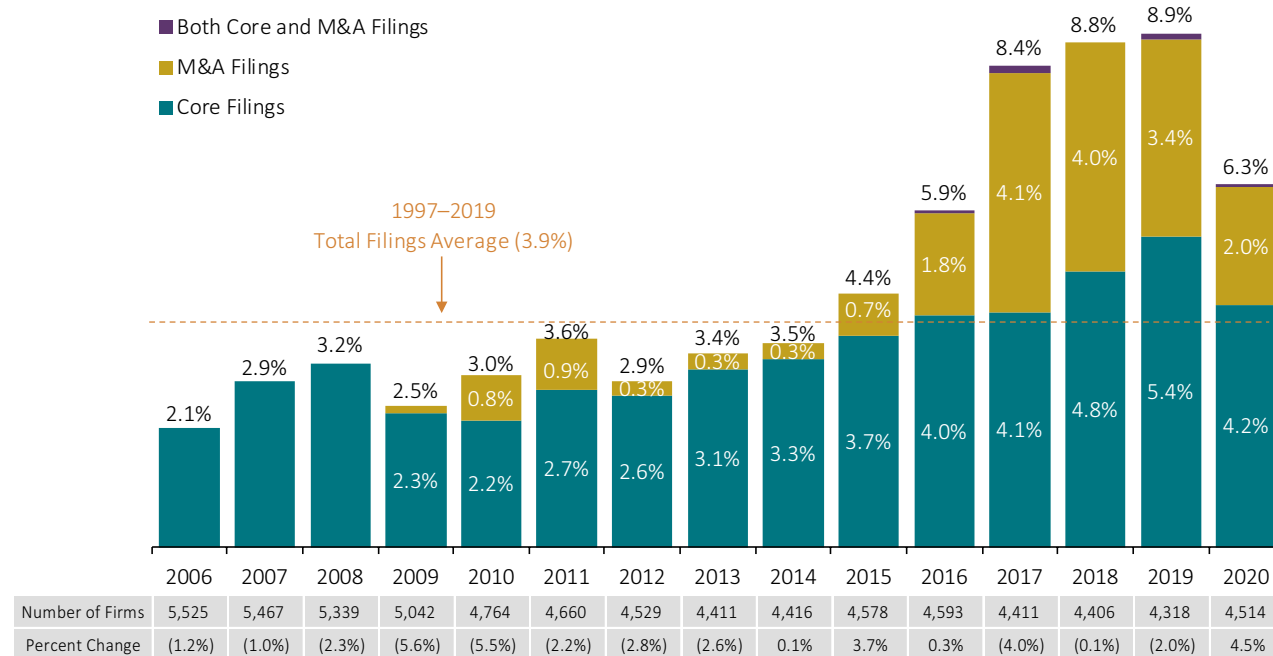
The percentage of companies subject to filings is calculated as the unique number of companies listed on the NYSE or Nasdaq subject to federal or state securities fraud class actions in a given year divided by the unique number of companies listed on the NYSE or Nasdaq in the same year.

- The percentage of companies subject to filings decreased for the first time in eight years, from a historic high of 8.9% in 2019 to 6.3% in 2020. This was also the largest one-year drop on record. Nonetheless, the 6.3% in 2020 remains well above the 1997–2019 average of 3.9%.

Although the likelihood of filings targeting U.S. exchange-listed companies dropped to its lowest level since 2016, it remained well above the historical average.

- The percentage of all companies subject to M&A filings decreased for the third consecutive year to 2.1%, but remained well above levels prior to 2016.
- Approximately one in 23 companies listed on U.S. exchanges was the subject of a core filing in 2020.

Figure 11: Percentage of U.S. Exchange-Listed Companies Subject to Federal or State Filings 2006–2020



Source: Securities Class Action Clearinghouse; Center for Research in Security Prices (CRSP)

Note:

- Percentages are calculated by dividing the count of issuers listed on the NYSE or Nasdaq subject to filings by the number of companies listed on the NYSE or Nasdaq as of the beginning of the year. Percentages may not sum due to rounding.
- Core Filings and M&A Filings do not include instances in which a company has been subject to both a core and M&A filing in the same year. These are reported separately in the category labeled Both Core and M&A Filings. Since 2009 there have been 21 instances in which a company has been subject to both core and M&A filings in the same year. In 2016, 2017, 2019, and 2020, these filings represented 0.1% of exchange listed-companies. In 2009, 2010, 2013, and 2015, these filings accounted for less than 0.1% of exchange-listed companies.
- Listed companies were identified by taking the count of listed securities at the beginning of each year and accounting for cross-listed companies or companies with more than one security traded on a given exchange. Securities were counted if they were classified as common stock or ADRs and listed on the NYSE or Nasdaq.
- This figure presents combined federal and state data. Filings in federal courts may have parallel cases filed in state courts. When parallel cases are filed in different years, only the earlier filing is reflected in the figure above. Filings against the same company brought in different states without a filing brought in federal court are counted as unique state filings. The figure begins including issuers facing suits in state 1933 Act filings in 2010.

Heat Maps: S&P 500 Securities Litigation™ for Federal Core Filings

The Heat Maps analysis illustrates federal court securities class action activity by industry sector for companies in the S&P 500 index. Starting with the composition of the S&P 500 at the beginning of each year, the Heat Maps examine each sector by:

- (1) The percentage of these companies subject to new securities class actions in federal court during each calendar year.
 - (2) The percentage of the total market capitalization of these companies subject to new securities class actions in federal court during each calendar year.
- Of companies in the S&P 500 at the beginning of 2020, approximately one in 23 companies (4.4%) was a defendant in a core federal filing. This percentage is the lowest it has been since 2015. See Appendix 2A for percentage of companies by sector from 2001 to 2020.
 - The Consumer Staples, Industrials, and Communication Services/Telecommunications/Information Technology sectors all experienced large drops in the rate of federal filings compared to 2019.
 - The companies in the Consumer Discretionary, Financials/Real Estate, and Utilities sectors have nearly the same or higher likelihoods of core federal filings this year compared to 2019, while rates in all other sectors have fallen, many of which are now the lowest they have been since 2015.
 - Over the period 2011–2020, Energy/Materials is the only sector in which the percentage of companies subject to core federal filings (1.9% in 2020) has never risen above 5%.

The likelihood of an S&P 500 company being sued continued to decline after a decade high in 2018.

Figure 12: Heat Maps of S&P 500 Securities Litigation™ Percentage of Companies Subject to Core Federal Filings

	Average 2001–2019	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Consumer Discretionary	5.2%	3.8%	4.9%	8.4%	1.2%	0.0%	3.6%	8.5%	10.0%	3.1%	8.1%
Consumer Staples	3.8%	2.4%	2.4%	0.0%	0.0%	5.0%	2.6%	2.7%	11.8%	12.1%	3.1%
Energy/Materials	1.6%	0.0%	2.7%	0.0%	1.3%	0.0%	4.5%	3.3%	1.8%	3.7%	1.9%
Financials/Real Estate	7.6%	1.2%	3.7%	0.0%	1.2%	1.2%	6.9%	3.3%	7.0%	2.0%	5.3%
Health Care	9.1%	2.0%	1.9%	5.7%	0.0%	1.9%	17.9%	8.3%	16.1%	12.9%	6.3%
Industrials	4.2%	1.7%	1.6%	0.0%	4.7%	0.0%	6.1%	8.7%	8.8%	10.1%	2.7%
Communication Services/ Telecommunications/ Information Technology	6.5%	7.1%	3.8%	9.1%	0.0%	4.2%	6.8%	8.5%	12.7%	10.0%	2.0%
Utilities	5.2%	0.0%	0.0%	0.0%	0.0%	3.4%	3.4%	7.1%	7.1%	6.9%	7.1%
All S&P 500 Companies	5.5%	2.6%	3.0%	3.4%	1.2%	1.6%	6.6%	6.4%	9.4%	7.2%	4.4%

0%
0–5%
5–15%
15–25%
25%+

Note:

1. The figure is based on the composition of the S&P 500 as of the last trading day of the previous year.
2. Sectors are based on the Global Industry Classification Standard (GICS).
3. Percentage of Companies Subject to New Filings equals the number of companies subject to new securities class action filings in federal courts in each sector divided by the total number of companies in that sector.
4. In August 2016, GICS added a new industry sector, Real Estate. This analysis begins using the Real Estate industry sector in 2017. In 2018, the Telecommunication Services sector was incorporated into a new sector, Communication Services. With this name change, all companies previously classified as Telecommunication Services and some companies classified as Consumer Discretionary (such as Netflix, Comcast, and CBS) and Information Technology (such as Alphabet and Facebook) were reclassified into the Communication Services sector.

- The percentage of total market capitalization of S&P 500 companies subject to core federal filings fell from 10% in 2019 to 4.3% in 2020. See Appendix 2B for market capitalization percentage by sector from 2001 to 2020.
- The percentage of companies in the Financials/Real Estate sector subject to core federal filings more than doubled relative to 2019, while the percentage of this sector's market capitalization subject to core federal filings increased more than sevenfold year-over-year.
- All sectors other than the Financials/Real Estate and Consumer Discretionary sectors saw a decrease in the percentage of market capitalization subject to core federal filings compared to 2019.

In six of the eight sectors, the percentage of market capitalization subject to core federal filings fell from the previous year.

Figure 13: Heat Maps of S&P 500 Securities Litigation™ Percentage of Market Capitalization Subject to Core Federal Filings

	Average 2001–2019	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Consumer Discretionary	4.8%	4.6%	1.6%	4.4%	2.5%	0.0%	2.8%	8.2%	4.7%	0.5%	2.2%
Consumer Staples	4.4%	0.8%	14.0%	0.0%	0.0%	1.9%	1.0%	6.7%	15.2%	9.1%	1.8%
Energy/Materials	2.8%	0.0%	0.9%	0.0%	0.2%	0.0%	19.8%	2.3%	1.4%	1.2%	0.4%
Financials/Real Estate	14.3%	6.9%	11.0%	0.0%	0.3%	3.0%	11.9%	1.5%	12.5%	2.2%	16.9%
Health Care	12.3%	0.7%	0.8%	4.4%	0.0%	3.1%	13.2%	2.7%	26.3%	6.6%	4.7%
Industrials	9.3%	2.1%	1.2%	0.0%	1.7%	0.0%	8.7%	22.3%	19.4%	21.6%	4.9%
Communication Services/ Telecommunications/ Information Technology	10.4%	13.4%	2.2%	16.6%	0.0%	7.0%	12.3%	4.4%	19.4%	18.0%	1.6%
Utilities	6.1%	0.0%	0.0%	0.0%	0.0%	3.7%	4.4%	9.6%	6.5%	7.9%	6.6%
All S&P 500 Companies	9.0%	5.0%	4.3%	4.7%	0.6%	2.8%	10.0%	6.1%	14.9%	10.0%	4.3%



Note:

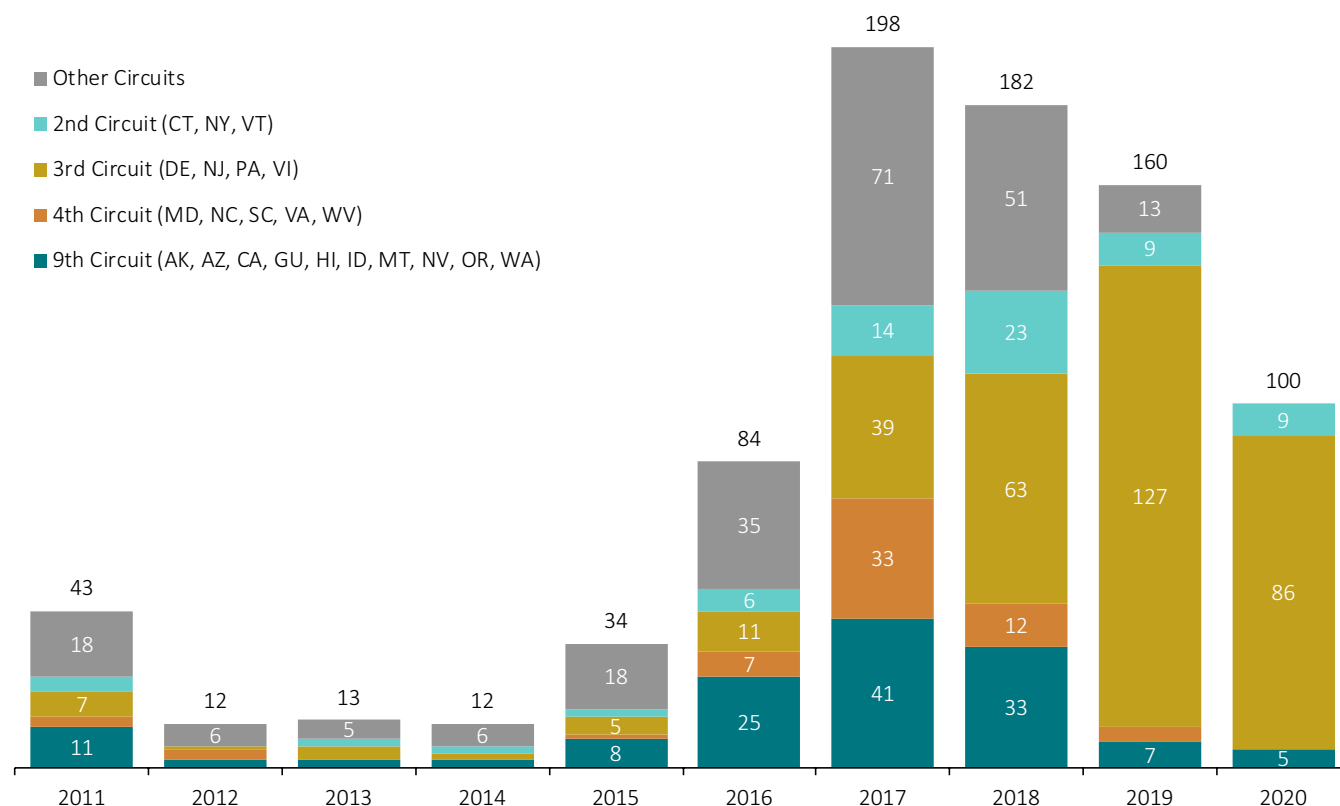
1. The figure is based on the composition of the S&P 500 as of the last trading day of the previous year.
2. Sectors are based on the Global Industry Classification Standard (GICS).
3. Percentage of Market Capitalization Subject to New Filings equals the market capitalization of companies subject to new securities class action filings in federal courts in each sector divided by the total market capitalization of companies in that sector.
4. In August 2016, GICS added a new industry sector, Real Estate. This analysis begins using the Real Estate industry sector in 2017. In 2018, the Telecommunication Services sector was incorporated into a new sector, Communication Services. With this name change, all companies previously classified as Telecommunication Services and some companies classified as Consumer Discretionary (such as Netflix, Comcast, and CBS) and Information Technology (such as Alphabet and Facebook) were reclassified into the Communication Services sector.

M&A Filings by Federal Circuit

- In January 2016, the Delaware Court of Chancery rejected a disclosure-only settlement in Zillow's acquisition of Trulia.¹ This appears to have resulted in some venue shifting for M&A lawsuits from state to federal courts.
- There were 100 federal M&A filings in 2020, the fewest since 2016.
- Of all M&A filings in 2020, 86% were in the Third Circuit, the highest percentage attributable to one circuit since tracking began in 2009. All of these filings were brought in Delaware federal courts.
- There were no M&A filings in circuits other than the Second, Third, and Ninth Circuits. This is the first time this has occurred, and only the third time that there were no filings in the Fourth Circuit since tracking began.
- Of total filings in the Third Circuit in 2020, 78% were M&A filings, by far the highest percentage of any circuit.

86% of M&A filings in 2020 occurred in Delaware courts.

Figure 14: Annual M&A Filings by Federal Circuit 2011–2020



Note: The Securities Class Action Clearinghouse began tracking M&A filings as a separate category in 2009.

1. See *In re Trulia Inc. Stockholder Litigation*, C.A. No. 10020-CB (Del. Ch. Jan. 22, 2016), <http://courts.delaware.gov/opinions/download.aspx?ID=235370>.

Most Frequent Plaintiff Counsel on M&A Filings in Federal Courts

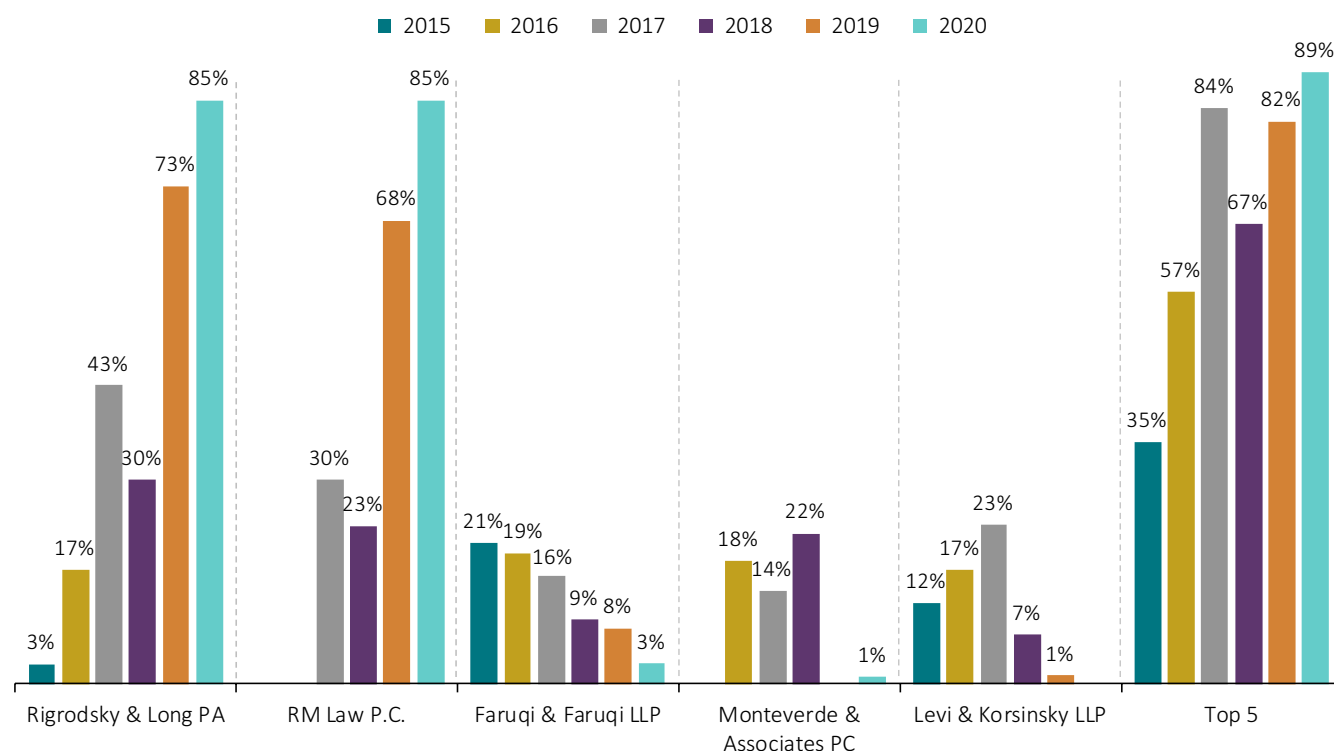
This analysis shows the five plaintiff firms listed most frequently on federal first identified M&A complaints against a given company from 2015 through 2020. Each instance in which they are counsel or co-counsel on a first identified complaint is presented.

- There were 100 M&A filings in federal courts in 2020. These five plaintiff firms were listed as counsel or co-counsel on 89 first identified complaints.
- The shares of first identified complaints filed by Faruqi & Faruqi LLP, Monteverde & Associates PC, and Levi & Korsinsky LLP—frequent filers in some of the prior years—have fallen dramatically, and are each under 4% of total federal M&A filings.

At least one of the top five firms was listed as plaintiff counsel or co-counsel on 89% of first identified M&A complaints in 2020.

- Rigrodsky & Long PA and RM Law P.C. have commonly been co-counsel. They were co-counsel on all 85 of their filings and were responsible for an absolute majority of federal first identified M&A complaints in 2020.
- Since 2015, at least one of these five plaintiff firms has been listed as counsel or co-counsel on 75% of M&A filings.

Figure 15: Most Frequent Plaintiff Counsel or Co-counsel on M&A Filings 2015–2020



Source: Cornerstone Research and Stanford Law School Securities Class Action Clearinghouse

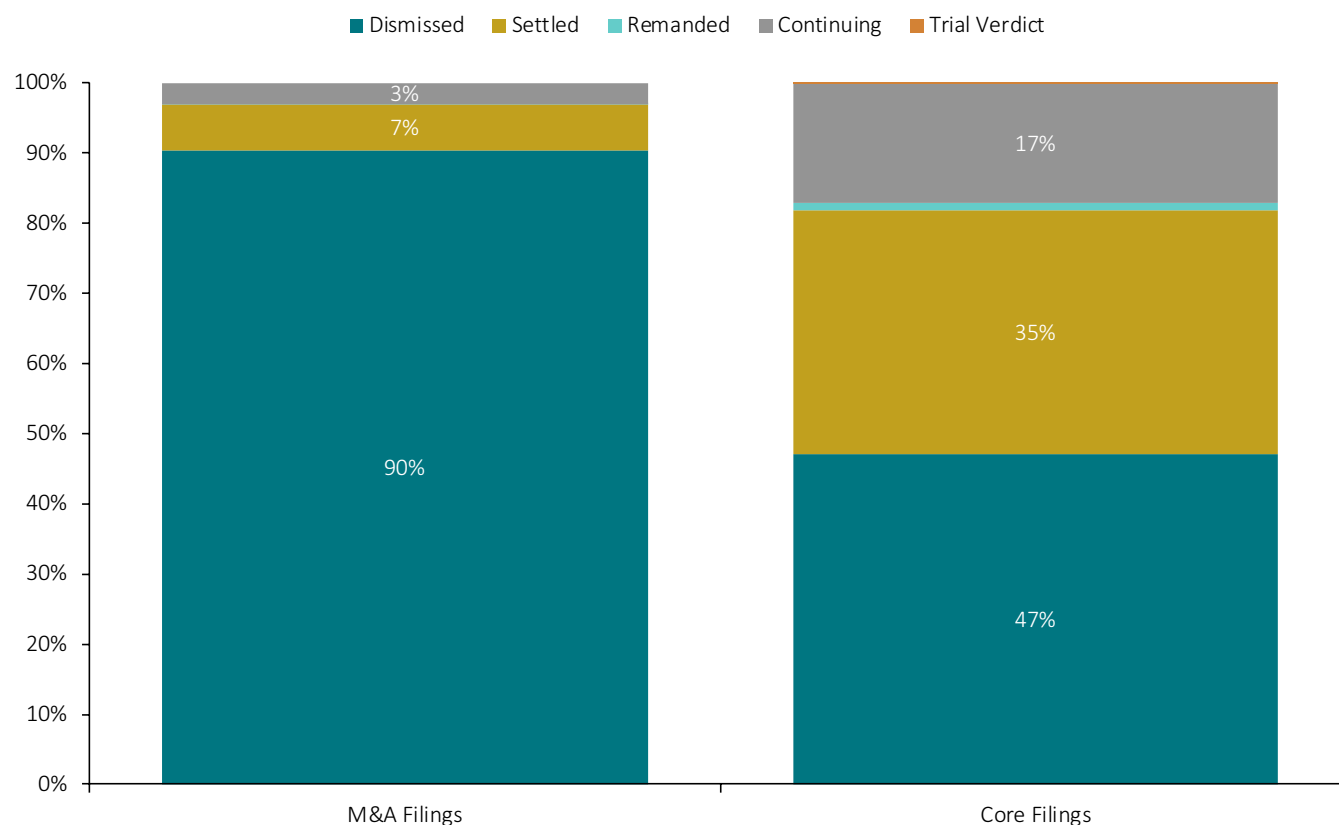
Note: These firms are the top five most frequent firms listed on first identified complaints from 2015 through 2020, not necessarily the five most frequent filers in each year. More than one plaintiff law firm can be listed on the first identified complaint. Therefore, the sums of individual filer shares presented may exceed the share of filings involving any one of the top five plaintiff firms.

Status of M&A Filings in Federal Courts

- There were 777 M&A filings between 2010 and 2019, compared to 1,763 core federal filings over the same period.
- From 2010 to 2019, about 97% of M&A filings were resolved as compared to about 82% of core filings.
- M&A filings exhibited settlement rates 28 percentage points below core federal filings. On the other hand, M&A filings exhibited dismissal rates 43% above (almost double) core federal filings. See Appendix 3 for a year-by-year overview of M&A and core filings status.

M&A filings were dismissed at a much higher rate and settled at a much lower rate than core federal filings.

Figure 16: Status of M&A Filings Compared to Core Federal Filings 2010–2019



Note:

1. The Securities Class Action Clearinghouse began tracking M&A filings as a separate category in 2009.
2. The 2020 filing cohort is excluded since a large percentage of cases are ongoing.
3. Since 2010, there have only been two cases tried to a verdict, both of which were core filings. One of these cases settled after trial and is categorized as settled in the data.
4. Percentages may not sum to 100% due to rounding.

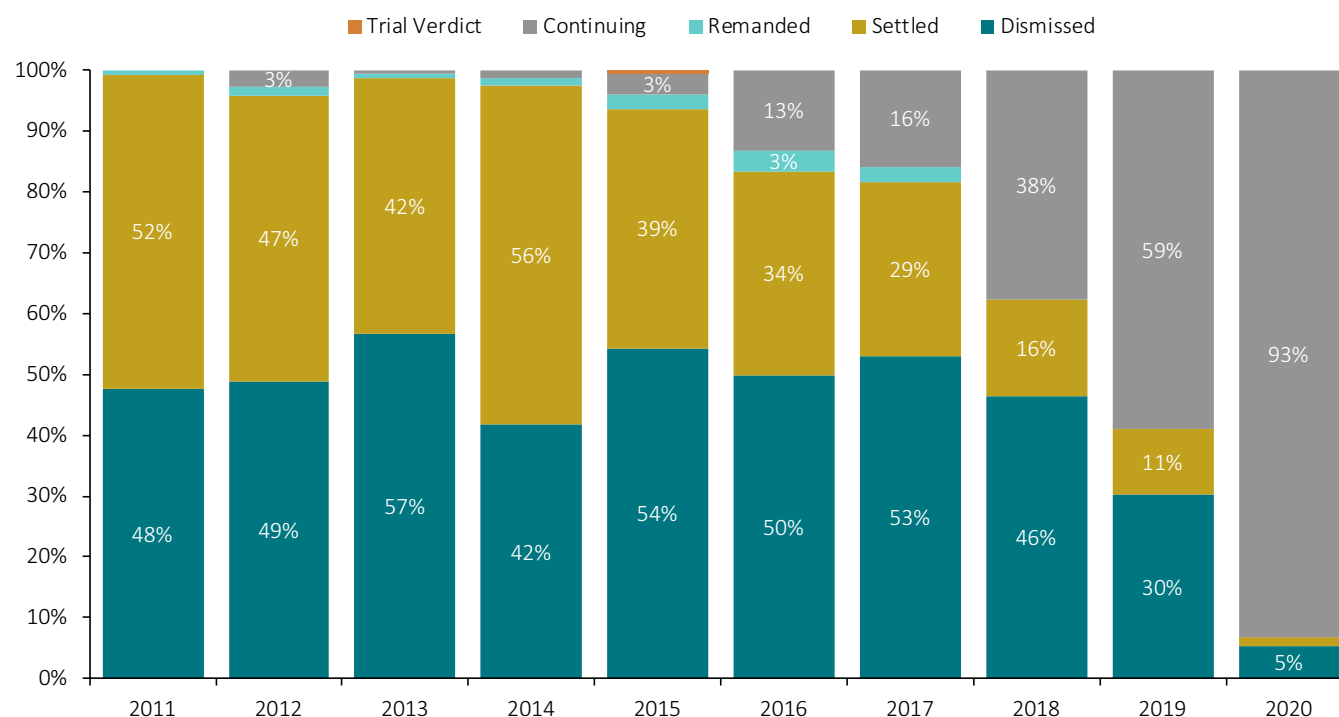
Status of Core Federal Securities Class Action Filings

This analysis compares filing groups to determine whether filing outcomes have changed over time. As each cohort ages, a larger percentage of filings are resolved—whether through dismissal, settlement, remand, or trial verdict.

The dismissal rate for the 2018 core federal filings cohort is currently nearly half of all cases, despite 38% of cases still continuing.

- From 1997 to 2020, 46% of core federal filings were settled, 42% were dismissed, less than 1% were remanded, and 11% are continuing. During this time, only 0.4% of core federal filings (or 19 cases) reached trial, and 0.2% (11 cases) were tried to a verdict.
- Recent annual dismissal rates have been closer to 50%. From 2011 to 2018 the cohorts with the most divergent dismissal rates were 2014 (at 42%) and 2013 (at 57%).
- More recent cohorts have too many ongoing cases to determine their ultimate dismissal rates. However, the 2017 cohort will end up having a dismissal rate of at least 53%.

Figure 17: Status of Filings by Year—Core Federal Filings 2011–2020



Note:

1. Percentages may not sum to 100% due to rounding.
2. Since 2010, there have only been two cases tried to a verdict, both of which were core filings. One of these cases settled after trial and is categorized as settled in the data.
3. Since 2001, 14 cases have gone to trial. Since *Halliburton II* was decided on June 30, 2014, only one case has gone to trial.

1933 Act Cases Filed in State Courts

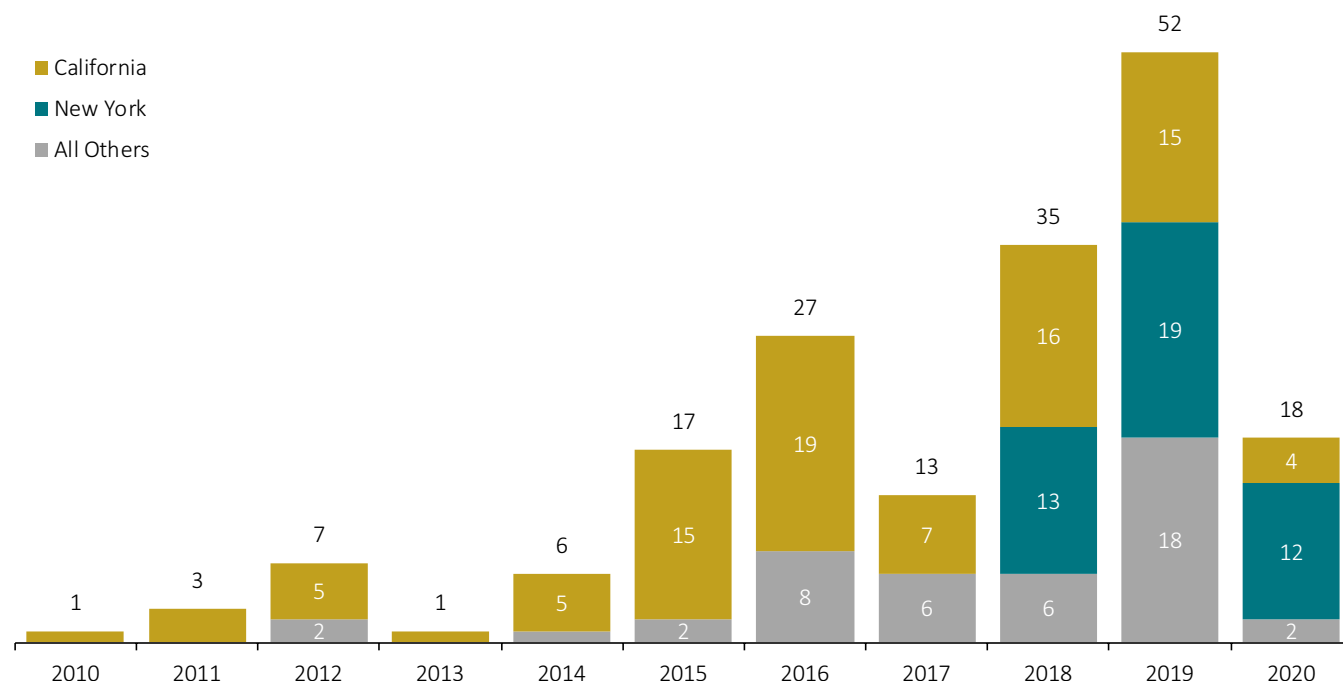
The following data include 1933 Act filings in California, New York, and other state courts. Filings from prior years are added retrospectively when identified. These filings may include Section 11, Section 12, and Section 15 claims, but do not include Rule 10b-5 claims.

- In 2020, the number of state 1933 Act filings dropped dramatically with only four filings in California state courts, 12 filings in New York state courts, and only two filings in other state courts.

- Filings in New York state courts accounted for the vast majority of state filings in 2020.
- State filings in states outside of New York and California dropped to the lowest level since 2015. Massachusetts and Ohio each accounted for one state filing.

State 1933 Act filing activity decreased by 65% from 2019, driven largely by reduced filings in state courts outside of New York.

**Figure 18: State 1933 Act Filings by State
2010–2020**



Source: Cornerstone Research and Stanford Law School Securities Class Action Clearinghouse; Bloomberg Law; ISS' SCAS

Note:

- This analysis counts all filings in state courts. It does not present data on a combined federal and state basis, nor does it identify or account for cases that have parallel filings in both state and federal courts. As a result, totals in this analysis may not match Figures 3, 4, 20, or 22.
- All Others contains filings in Alabama, Arizona, Colorado, Florida, Georgia, Illinois, Iowa, Massachusetts, Michigan, Nevada, New Hampshire, New Jersey, Ohio, Oregon, Pennsylvania, Rhode Island, Tennessee, Texas, Utah, Washington, West Virginia, and Wisconsin.
- Beginning in 2018, California state filings may contain either Section 11 or Section 12 claims. Of the 16 filings in California in 2018, six filings contained Section 12 claims without also containing Section 11 claims.

Dollar Loss on Offered Shares™ (DLOS Index™) in Federal Section 11–Only and State 1933 Act Filings

This analysis calculates the loss of market value of class members' shares offered in securities issuances that are subject to 1933 Act claims. It is calculated as the shares offered at issuance (e.g., in an initial public offering (IPO), a seasoned equity offering (SEO), or a corporate merger or spinoff) acquired by class members multiplied by the difference between the offering price of the shares and their price at the end of the class period.

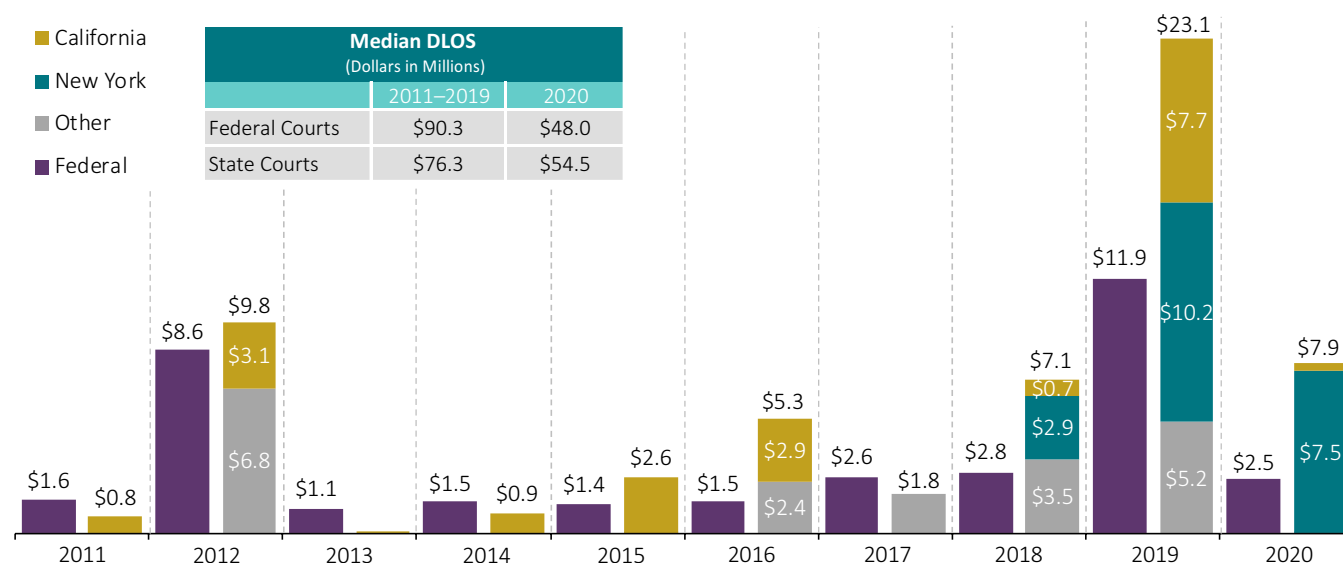
This alternative measure of losses has been calculated for federal filings involving only Section 11 claims (i.e., no Section 10(b) claims) and 1933 Act filings in state courts. This measure, Dollar Loss on Offered Shares (DLOS), aims to capture, more precisely than MDL, the dollar loss associated with the specific shares at issue as alleged in a complaint.

In 2020, the Dollar Loss on Offered Shares for filings in New York was nearly three times the amount in all federal courts, a first for any state.

- While total DLOS for federal filings fell below the 2011–2019 average of \$3.7 billion, total DLOS for state 1933 Act filings was above the 2011–2019 average of \$5.7 billion.
- In 2020, 1933 Act filings in New York accounted for 95% of all state 1933 Act DLOS, the highest percentage for any one state since 2015.

Figure 19: Dollar Loss on Offered Shares™ (DLOS Index™) for Federal Section 11–Only and State 1933 Act Filings 2011–2020

(Dollars in Billions)



Source: Cornerstone Research and Stanford Law School Securities Class Action Clearinghouse; Bloomberg Law; ISS' SCAS; CRSP; SEC EDGAR
Note:

- This analysis compares all Section 11 filings in federal courts with all 1933 Act filings in state courts. It does not present data on a combined federal and state basis, nor does it identify or account for cases that have parallel filings in both state and federal courts.
- Federal filings included in this analysis must contain a Section 11 claim and may contain a Section 12 claim, but do not contain Section 10(b) claims. Beginning in 2018, California state filings may contain either Section 11 or Section 12 claims. Of the 16 filings in California in 2018, six filings contained Section 12 claims without also containing Section 11 claims.

Comparison of Federal Section 11 Filings with State 1933 Act Filings

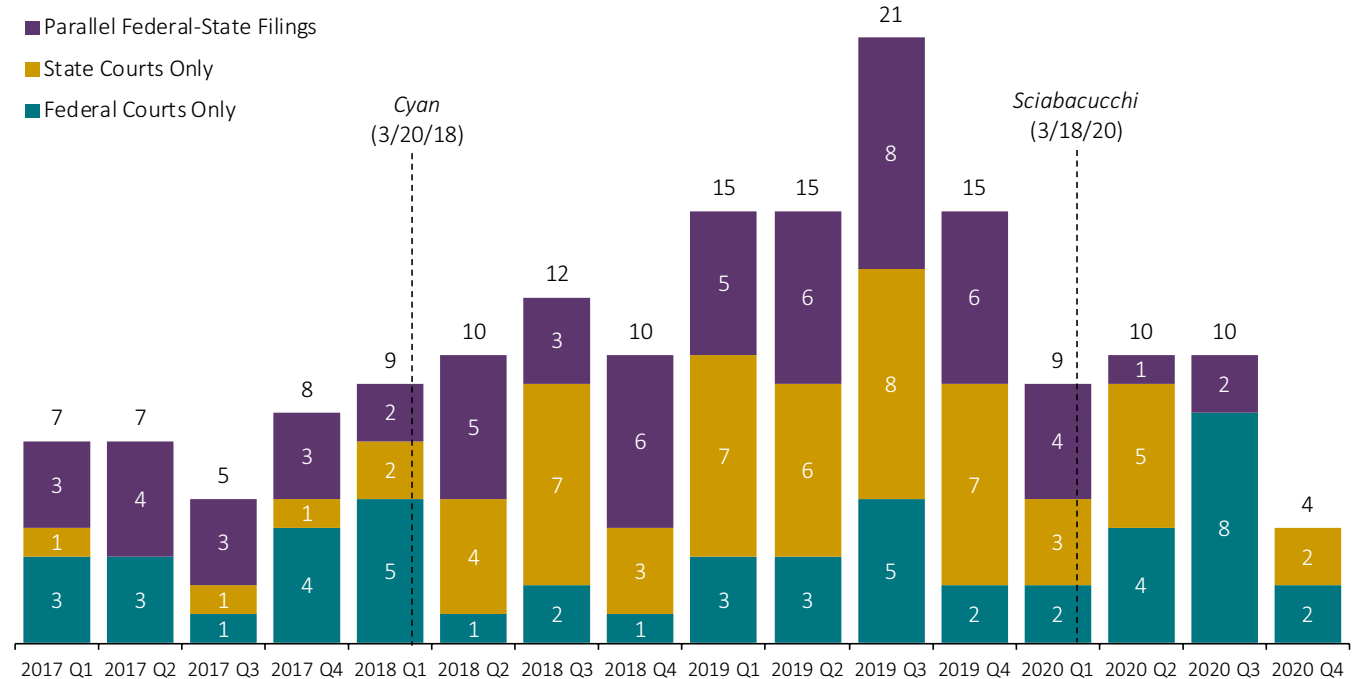
The figure below is a combined measure of Section 11 filing activity in federal courts and 1933 Act filings in state courts. It highlights parallel (or related) class actions in federal and state courts.

- Following *Cyan* but before the *Sciabacucchi* decision (i.e., 2018 Q2–2019 Q4), 43% were state-only filings and 40% were parallel filings. However, since *Sciabacucchi*, the percentage of state-only filings decreased to 29%, and the percentage of parallel filings decreased to 13%. During this same period, federal-only filings increased from 17% to 58%.

- In 2020, the combined number of federal Section 11 filings and state 1933 Act filings was 33, a 50% decrease from 2019. This consisted of seven parallel filings, 10 state-only filings, and 16 federal-only filings.
- Overall, the decrease in these filings can be attributed to decreases in parallel and state-only filings.

The third quarter of 2020 had the largest quarterly number of federal-only Section 11 filings since 2011, likely the effect of the Sciabacucchi decision.

Figure 20: Quarterly Federal Section 11 and State 1933 Act Filings 2017–2020



Source: Cornerstone Research and Stanford Law School Securities Class Action Clearinghouse; Bloomberg Law; ISS' SCAS

Note:

- The federal Section 11 filings displayed may include Rule 10b-5 claims, but state 1933 Act filings do not.
- This figure presents combined federal and state data. Filings in federal courts may have parallel cases filed in state courts. When parallel cases are filed in different quarters, only the earlier filing is reflected in the figure above. Filings against the same company brought in different states without a filing brought in federal court are counted as unique state filings. As a result, this figure's filing counts may not match those in Figures 18 or 21.
- Beginning in 2018, California state filings may contain either Section 11 or Section 12 claims. Of the 16 filings in California in 2018, six filings contained Section 12 claims without also containing Section 11 claims.

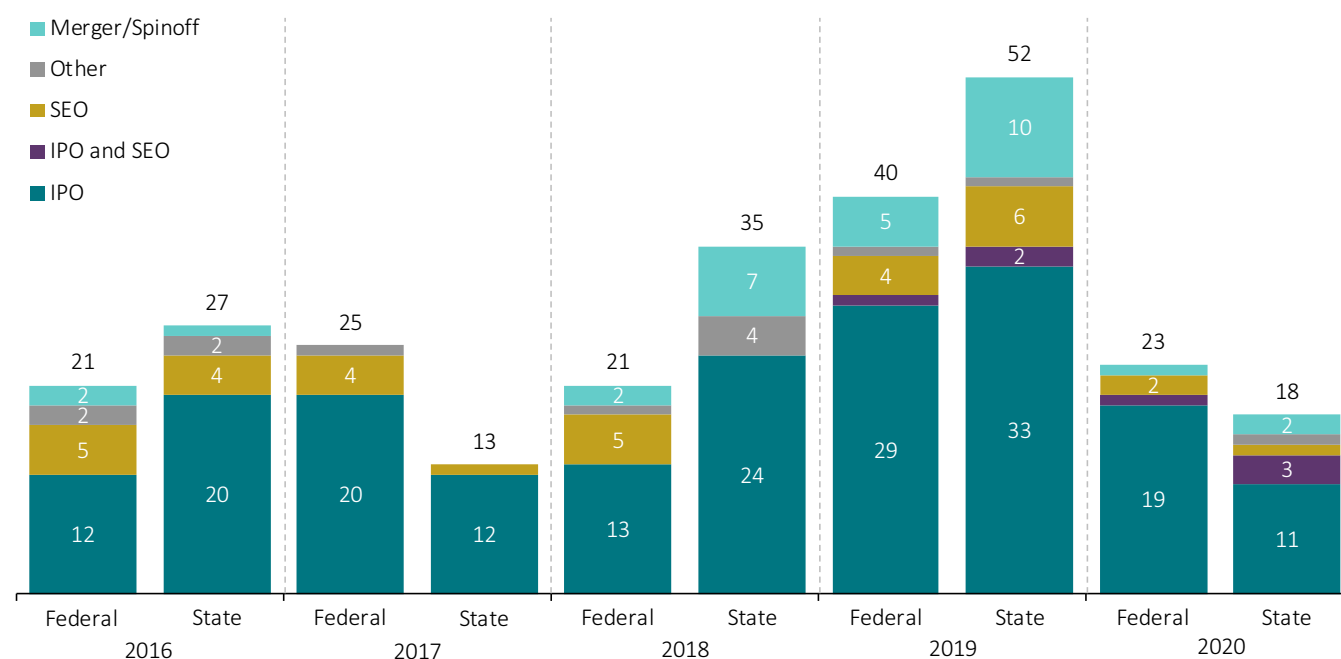
Type of Security Issuance Underlying Federal Section 11 and State 1933 Act Filings

The figure below illustrates Section 11 claims in federal courts and 1933 Act claims in state courts based on the type of security issuance underlying the lawsuit.

Filings related to mergers and spinoffs in both federal and state courts fell from last year's all-time high.

- Filings related to mergers and spinoffs fell substantially in 2020, from 10 to two in state courts and from five to one in federal courts. It is unclear how long this low level of merger-related filings will last given the likely increase in stock-for-stock mergers associated with SPACs. See discussion of IPOs and SPACs on the following page and on page 35.

Figure 21: Federal Section 11 and State 1933 Act Class Action Filings by Type of Security Issuance 2016–2020



Source: Cornerstone Research and Stanford Law School Securities Class Action Clearinghouse; Bloomberg Law; ISS' SCAS

Note:

- This analysis compares all Section 11 filings in federal courts with all 1933 Act filings in state courts. It does not present data on a combined federal and state basis, nor does it identify or account for cases that have parallel filings in both state and federal courts. As a result, this figure's filing counts may not match Figures 3, 4, 20, or 22.
- The federal Section 11 data displayed may contain Rule 10b-5 claims, but state 1933 Act filings do not.
- Beginning in 2018, California state filings may contain either Section 11 or Section 12 claims. Of the 16 filings in California in 2018, six filings contained Section 12 claims without also containing Section 11 claims.
- There was one federal court filing in 2019 related to both a merger-related issuance and SEO. This analysis categorizes this filing as relating to a merger-related issuance to avoid double-counting.

IPO Activity and Federal Section 11 and State 1933 Act Filings

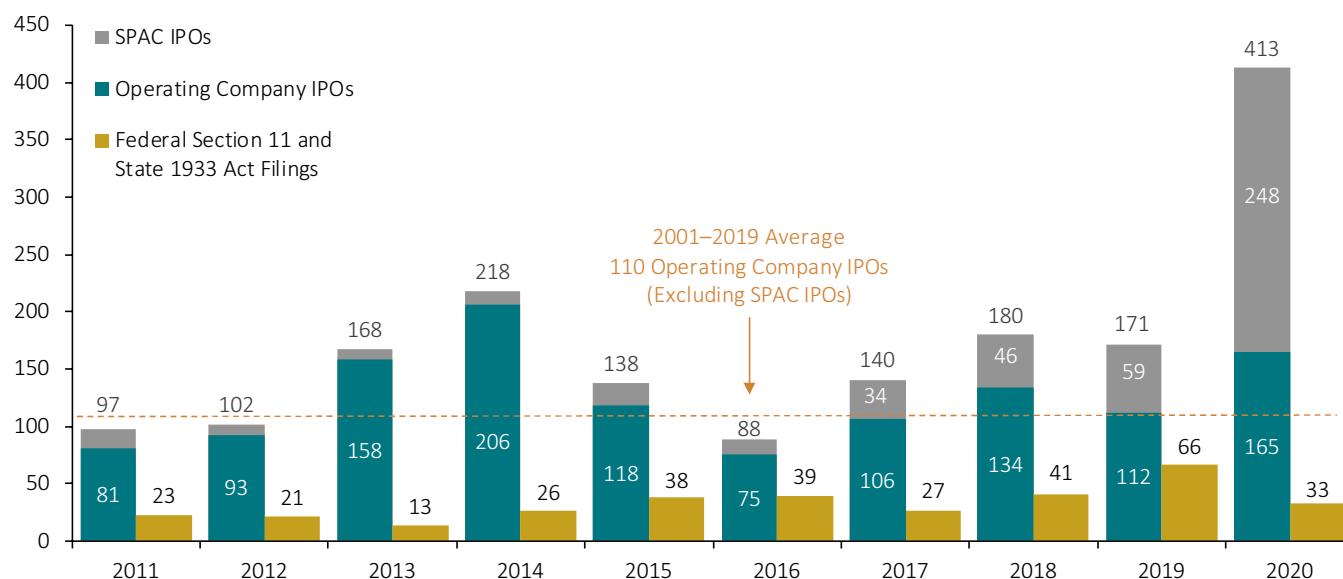
This figure compares IPO activity (operating company IPOs and SPAC IPOs) with counts of federal Section 11 and state 1933 Act filings.

- With 165 IPOs, the number of operating company IPOs increased 47% from 2019 to 2020, the largest percentage increase since 2013, and 50% above the 2001–2019 average of 110 operating company IPOs.
- Although historically SPACs have represented only a small portion of IPOs, in 2020 the number of SPAC IPOs more than quadrupled, increasing from 59 to 248.
- Generally, heavier IPO activity appears to be correlated with increased levels of federal Section 11 and state 1933 Act filings in ensuing years. Although the number of operating company IPOs increased to 165 from 112 in 2020, the number of federal Section 11 and state 1933 Act filings decreased from 66 to 33.

While the number of IPOs rose in 2020, filings with 1933 Act claims fell for the first time since 2017.

- In addition to the effect of the *Sciabacucchi* decision, 1933 Act filings were less numerous perhaps due to the fact that market declines in the first quarter of 2020 were driven by the COVID-19 pandemic—which was presumably unanticipated at the time of prior public offerings, followed by overall favorable market conditions beginning in April 2020—and the fact that a majority of IPOs occurred in the second half of 2020. The boom of SPACs in 2020 may lead to substantial future litigation.

Figure 22: Number of IPOs on Major U.S. Exchanges and Number of Filings of Federal Section 11 and State 1933 Act Claims 2011–2020



Source: Jay R. Ritter, "Initial Public Offerings: Updated Statistics," University of Florida, January 10, 2021

Note:

1. Operating company IPOs exclude the following offerings: those with an offer price of below \$5.00, ADRs, unit offers, closed-end funds, REITs, natural resource limited partnerships, small best efforts offers, banks and S&Ls, and stocks not included in the CRSP database (CRSP includes Amex, NYSE, and Nasdaq stocks).
2. SPAC IPOs include unit and non-unit SPAC IPOs, as defined by Professor Ritter.
3. This figure presents combined federal and state data. Filings in federal courts may have parallel cases filed in state courts. When parallel cases are filed in different years, only the earlier filing is reflected in the figure above. Filings against the same company brought in different states without a filing brought in federal court are counted as unique state filings. As a result, this figure's filing counts may not match those in Figures 18 or 21. The federal Section 11 cases displayed may include Rule 10b-5 claims, but state 1933 Act filings do not.

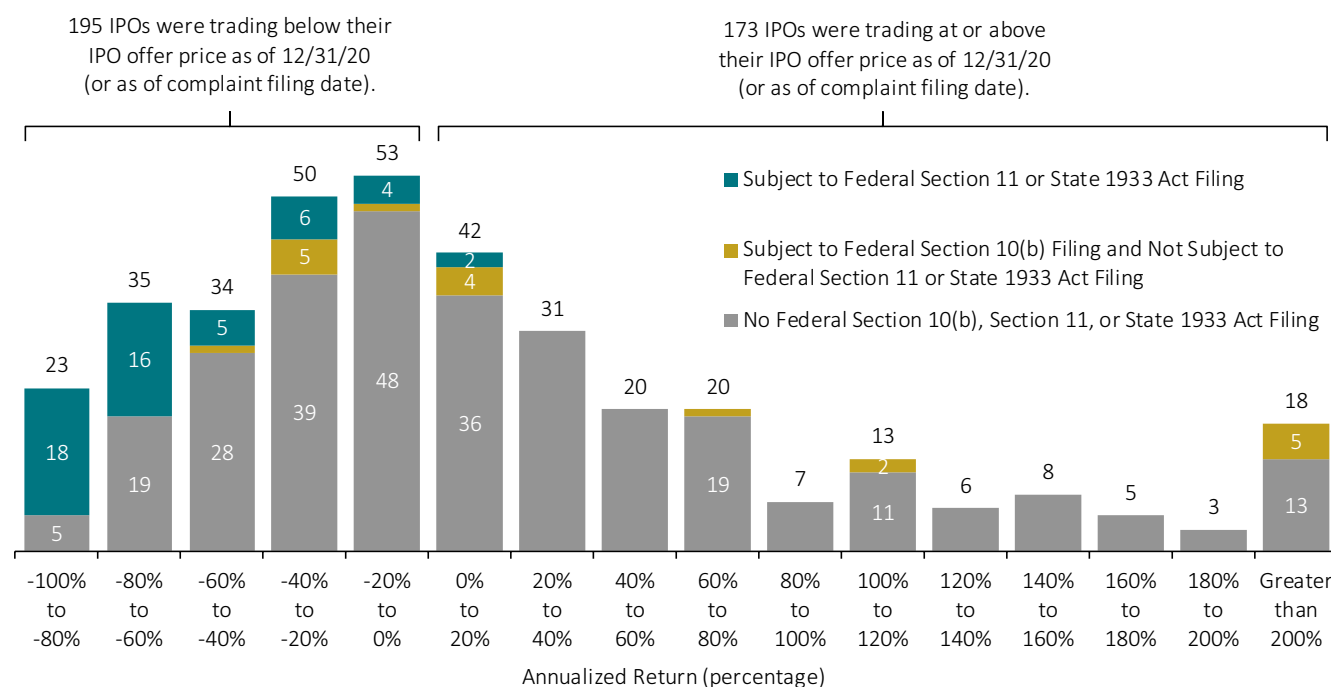
Performance of Recent IPOs

This analysis explores the relationship between a company's performance following its IPO and the degree to which these companies were the subject of a federal Section 11 filing, state 1933 Act filing, or federal Section 10(b) filing. IPOs from January 2018 to December 2019 are analyzed. The performance of these IPOs is evaluated through December 2020.

Fifty-one of 380 companies (13%) that undertook an IPO between January 2018 and December 2019 were later subject to a federal Section 11 or state 1933 Act filing.

- Post-IPO performance indicates that 53% of all companies that had undertaken an IPO and had not been delisted since January 2018 were trading below their IPO offer price at the time of a securities fraud complaint or as of December 31, 2020. Twelve companies were delisted as of December 31, 2020.
- Perhaps not surprisingly, companies with poorer post-IPO returns were more likely to be the target of a federal Section 11 or state 1933 Act filing.
- Nearly all (49 out of 51) companies that were subject to a federal Section 11 or state 1933 Act filing were trading below their IPO offer price as of the complaint filing date.

Figure 23: Performance of Recent IPOs
2018–2019



Source: Nasdaq; Bloomberg Law; ISS' SCAS; Refinitiv Eikon

Note:

1. IPOs examined exclude special-purpose acquisition companies, blank-check companies, and companies that were delisted or acquired before December 31, 2020. Bars without a number label represent one filing. Companies that were subject to a federal Section 11 filing or state 1933 Act filing have their returns calculated as the most recent closing stock price as of the complaint filing date, divided by the split-adjusted IPO offer price, minus one. Otherwise, returns are calculated as the closing stock price on December 31, 2020, divided by the split-adjusted IPO offer price, minus one. Returns are then annualized using the following formula: $\text{annualized return} = (1 + \text{nominal return})^{1 / \text{return period in years}}$. For simplicity, this analysis does not account for dividends.

2. The median lag between the IPO date and the date of an IPO-related Section 11 or state 1933 Act filing from 2010 to 2019 was roughly nine months (see Figure 24). The sample is therefore restricted to IPOs before December 31, 2019, one year before the publication of this report, to account for IPO filing lag.

Lag between IPO and Federal Section 11 and State 1933 Act Filings

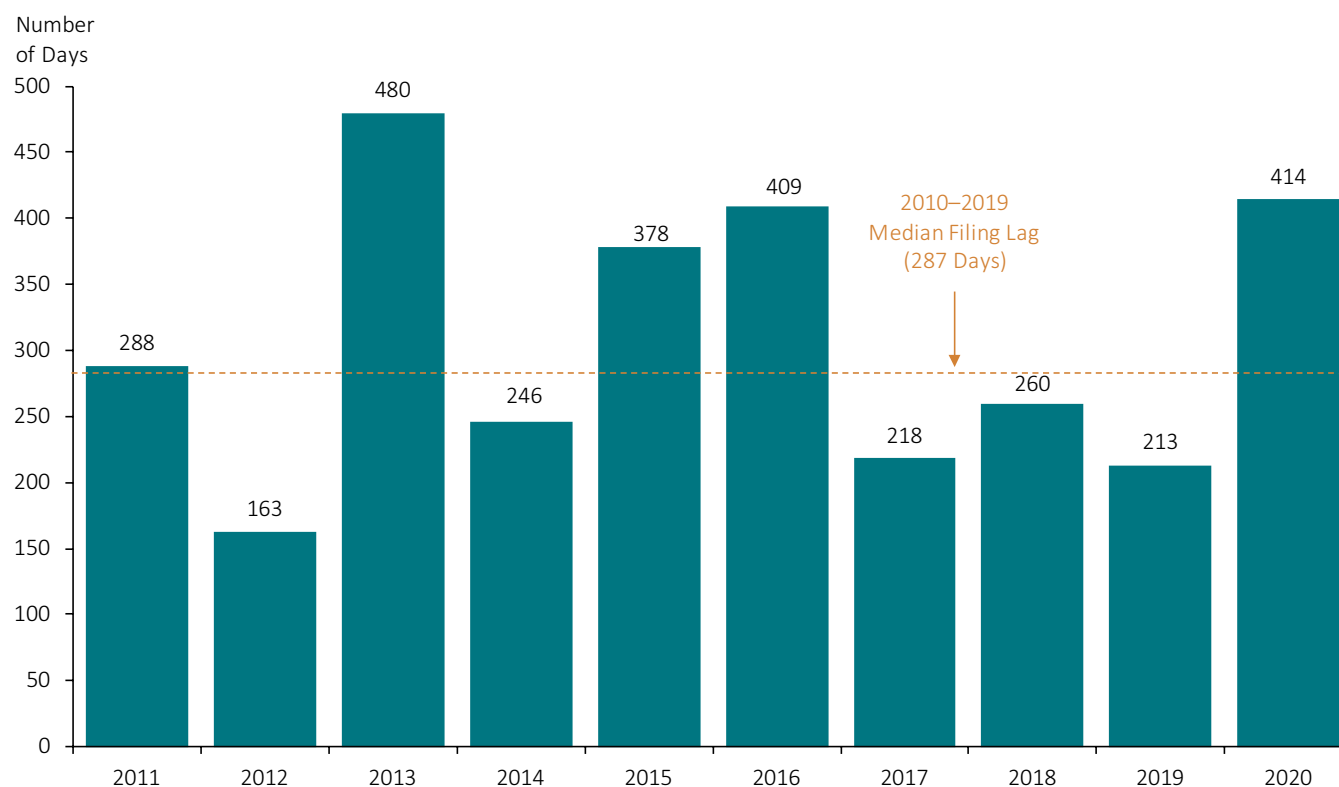
This analysis reviews the number of days between the IPO of a company and the filing date of a federal Section 11 or state 1933 Act securities class action.

- The IPO filing lag has varied substantially since 2010, but is fairly centered around the median filing lag of 287 days.
- The IPO filing lag grew 94% relative to 2019.

- 2020 is the first year to have an IPO filing lag greater than the 2010–2019 median filing lag since 2016.

During the period 2010–2019, the median filing lag for an IPO subject to a federal Section 11 or state 1933 Act claim was roughly nine months.

Figure 24: Lag between IPO and Federal Section 11 and State 1933 Act Filings 2011–2020



Note:

1. These data only consider IPOs with a subsequent federal Section 11 or state 1933 Act class action complaint. Only complaints that exclusively were in reference to an IPO were considered. Federal filings that also include Rule 10b-5 allegations are not considered.
2. Year refers to the year in which the complaint was filed.

IPO Litigation Likelihood

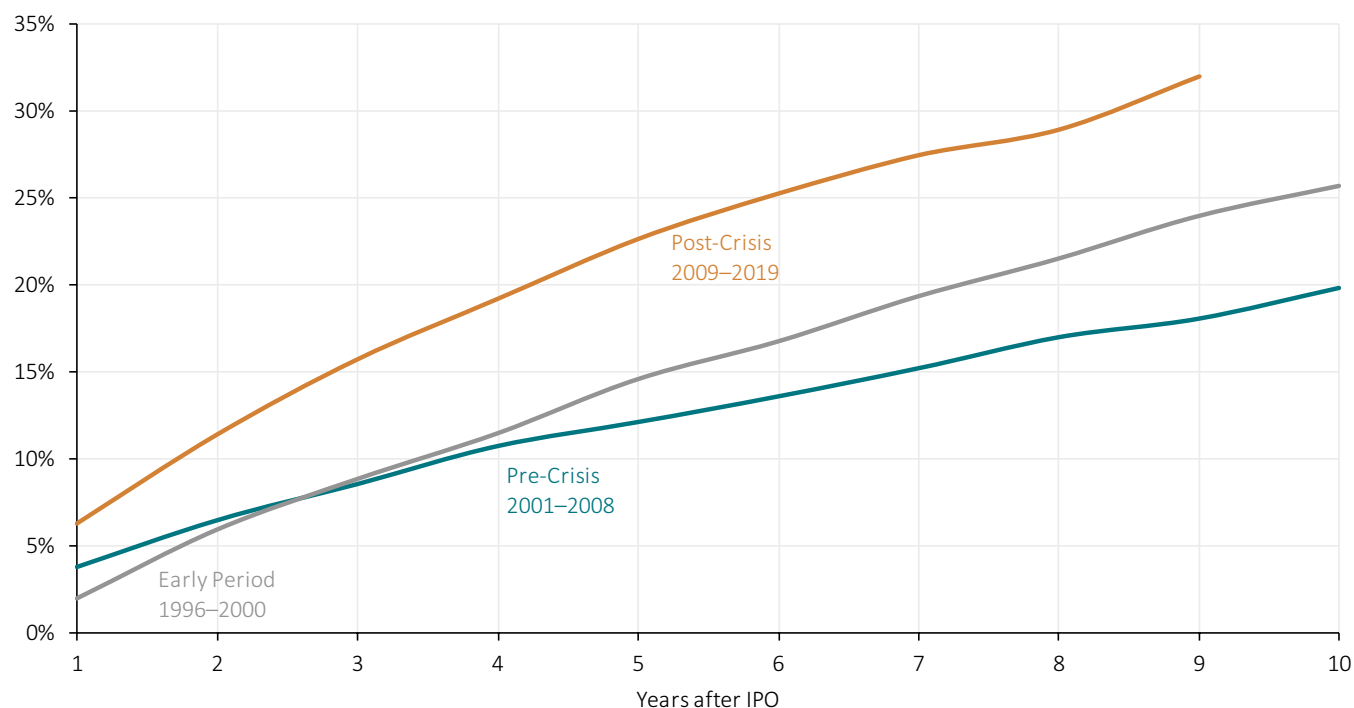
This figure compares the cumulative litigation exposure of IPOs to core federal and state 1933 Act filings since the 2008 credit crisis (post-crisis: 2009–2019) with two other groups of IPOs—core federal filings prior to the credit crisis (pre-crisis: 2001–2008) and prior to the dot-com collapse (early period: 1996–2000). 1933 Act filings exclusively in state courts enter into this analysis beginning in 2010.

- Post-crisis IPOs have faced higher litigation exposure in the first few years after an offering than IPOs in prior periods. For example, 19.2% of post-crisis IPOs have been subject to a core filing within four years of the IPO, compared to 10.8% for the pre-crisis cohort and 11.5% for the early period cohort.

IPOs from 2009 through 2019 have been subject to litigation at a steadily higher rate than earlier cohorts.

- For each IPO grouping, the incremental litigation exposure generally decreased with each year further removed from the IPO. See Appendix 5 for incremental exposure litigation values.

Figure 25: Likelihood of Litigation against Recent IPOs—Core Filings
2009–2019 IPOs versus Prior-Period IPOs



Source: Jay R. Ritter, “Founding Dates for Firms Going Public in the U.S. during 1975–2020,” University of Florida, January 2020; CRSP

Note:

- Cumulative litigation exposure measures the probability that a surviving company will be a defendant in at least one securities class action during the analysis period. For a detailed explanation about the methodology, see Cornerstone Research, *Securities Class Action Filings—2014 Midyear Assessment*, page 10 and Appendix 3.
- The post-crisis IPO cumulative litigation exposure is not presented for 10 years after the IPO due to limited data for cohorts with an IPO date toward the end of this period.
- State 1933 Act filings enter into this analysis beginning in 2010.

Federal Filing Lag

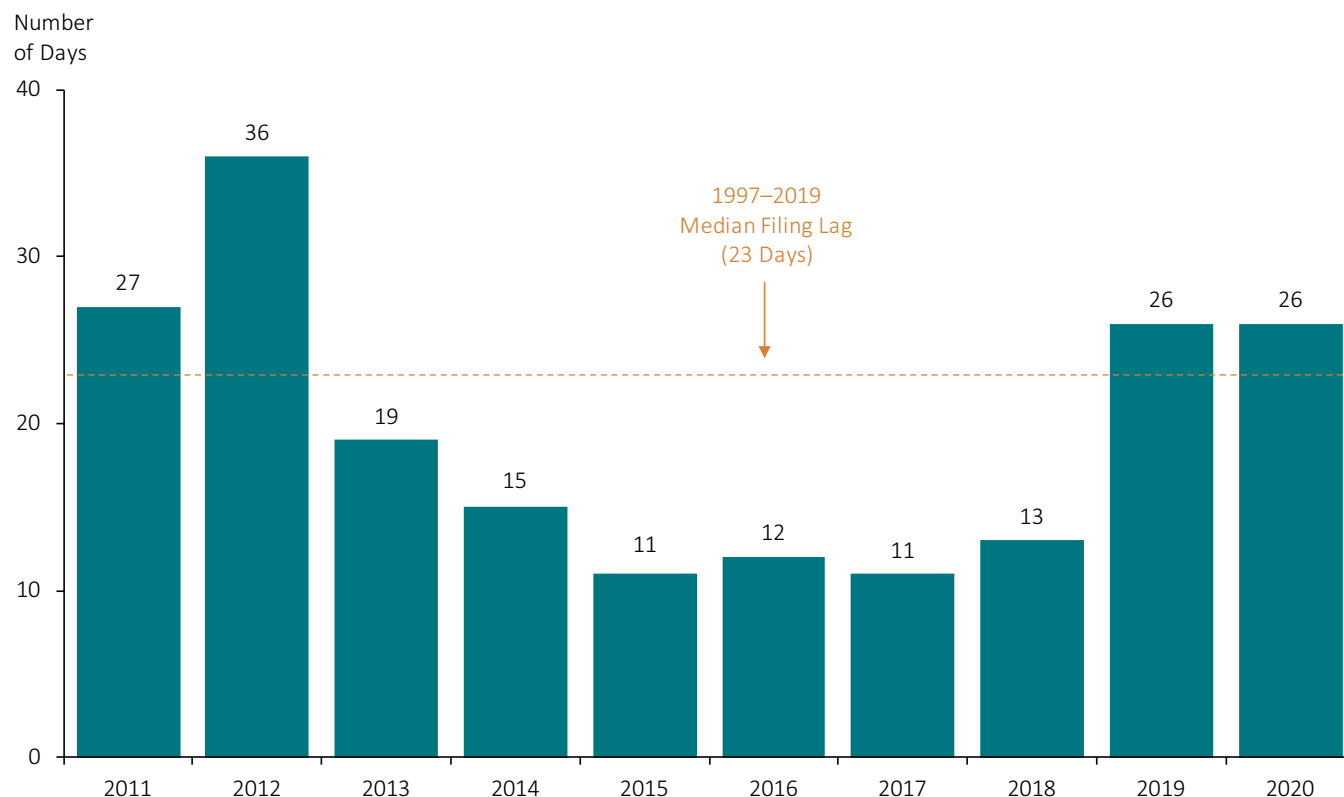
This analysis considers the number of days between the end of the class period and the filing date of a core federal securities class action.

- The median filing lag in 2020 remained at 26 days, which is slightly above the historical median value.
- From 2015 to 2018, the median filing lag fluctuated between 11 and 13 days.
- A comparison of MDL and DDL data with filing lag data indicates that, in 2020, filings with a lag greater than the median (26 days) had median MDL and DDL values that were more than double the median MDL and DDL values for filings with a lag lower than the median.

- The median filing lag for the three plaintiff firms listed most frequently on federal first identified complaints was 14 days, much lower than that for all other plaintiff firms (34 days).

The median filing lag in 2020 was 26 days, unchanged from 2019.

Figure 26: Annual Median Lag between Class Period End Date and Filing Date—Core Federal Filings 2011–2020



Note: This analysis excludes filings with only Section 11 claims and filings related to initial coin offerings or cryptocurrency because there is often no specified end of the class period.

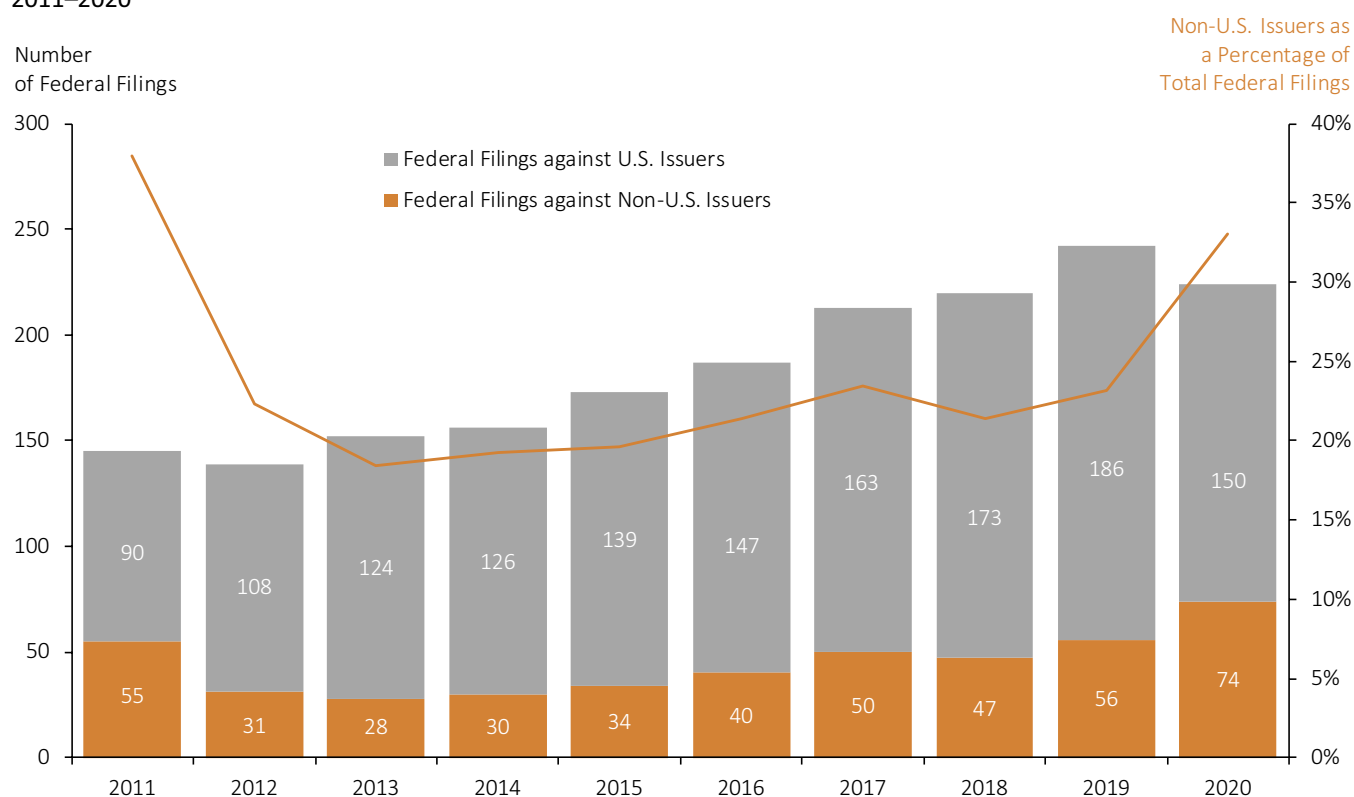
Non-U.S. Core Federal Filings

This index tracks the number of core federal filings against companies headquartered outside the United States relative to total core federal filings.

- The number of filings against non-U.S. issuers as a percentage of total filings has generally been trending upwards since 2013.
- As a percentage of total core federal filings, core federal filings against non-U.S. issuers increased to 33% in 2020, the highest since 2011 and the second highest on record.

The number of core federal filings against non-U.S. issuers reached a record high of 74.

Figure 27: Annual Number of Class Action Filings by Location of Headquarters—Core Federal Filings 2011–2020



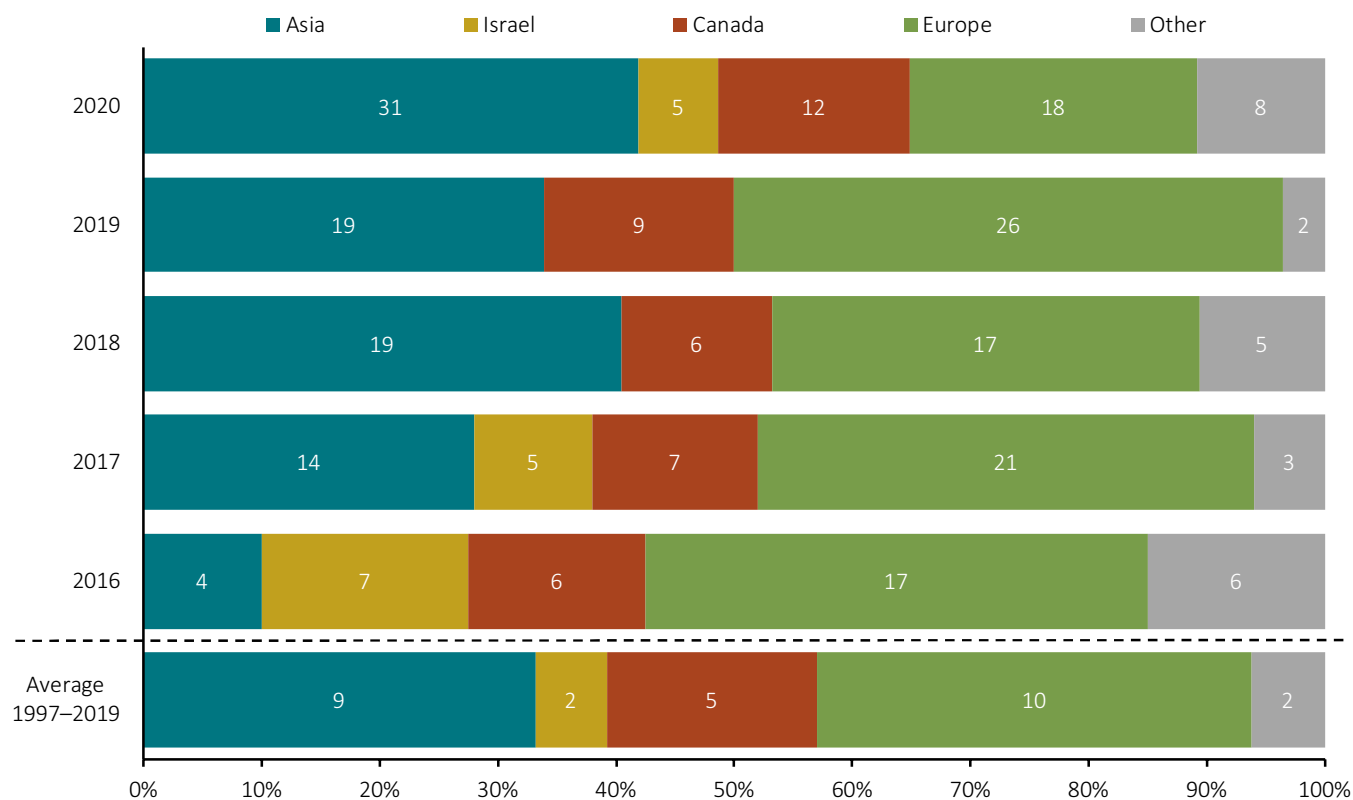
Note: This analysis only considers federal filings. It does not present combined federal and state data, and cases are not identified as parallel. This is different from other figures in this report that account for filings in federal courts that also have parallel cases identified in state courts. In those analyses, when parallel cases are filed in different years, only the earlier filing date is reflected in the analysis. As a result, this figure's filing counts may not match Figures 1, 3, 4, or 5.

- There were 31 core federal filings against Asian firms, the highest since a spike in Chinese reverse merger filings in 2011. Of these 31 filings, 24 involved Chinese firms. All four of the Singaporean filings had allegations related to cryptocurrency or SPACs.
- Of the 18 core federal filings against European firms, there were no more than four filings against companies headquartered in any one country.
- There were 12 core federal filings against Canadian firms, the highest since tracking began in 1997.

- Overall, this year's percentage breakdown by region was fairly standard with all regions (excluding Europe), within 9 percentage points of their respective 1997–2019 averages.

The number of filings against Asian firms was the highest since 2011.

Figure 28: Non-U.S. Filings by Location of Headquarters—Core Federal Filings



Source: United Nations, “Regional Groups of Member States”

Note:

1. The “Asia” category includes filings for companies headquartered in Hong Kong.
2. In 2020, the definition for region was changed to use groupings set by the United Nations. As a result, counts in this figure may not match those in prior reports.
3. This analysis only considers federal filings. It does not present combined federal and state data, and cases are not identified as parallel. This is different from other figures in this report that account for filings in federal courts that also have parallel cases identified in state courts. In those analyses, when parallel cases are filed in different years, only the earlier filing date is reflected in the analysis. As a result, this figure's filing counts may not match Figures 1, 3, 4, or 5.

Non-U.S. Company Litigation Likelihood of Federal Filings

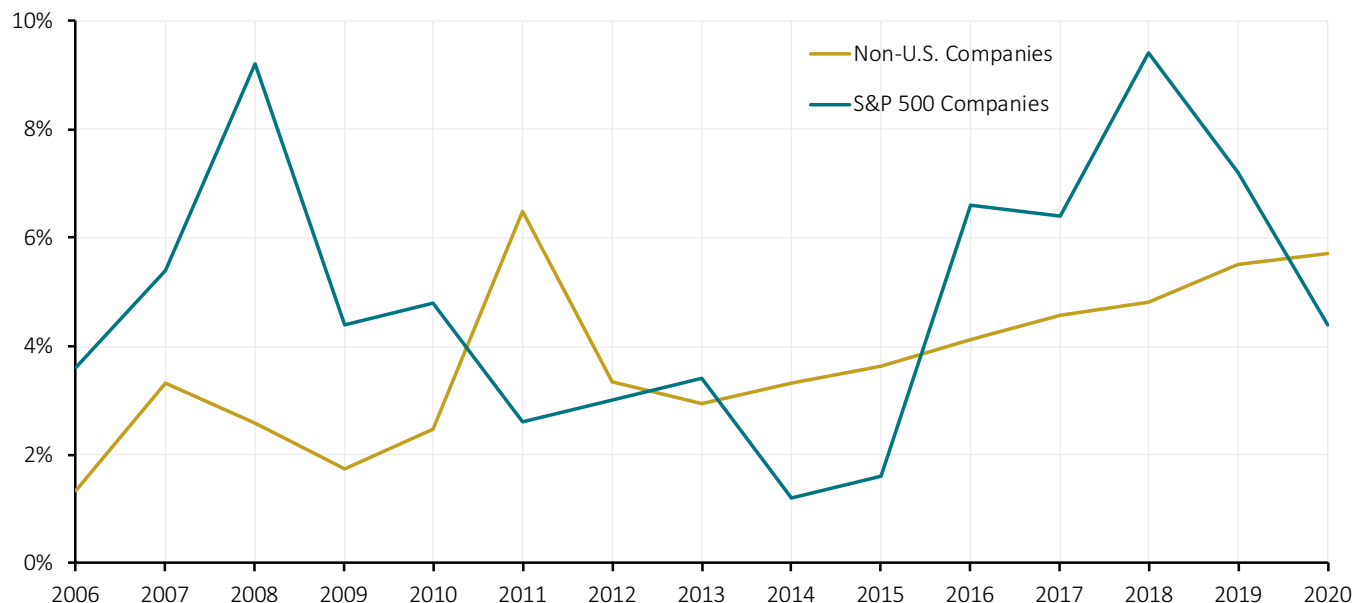
This figure examines the incidence of non-U.S. core federal filings relative to the likelihood of S&P 500 companies being the subject of a class action.

The percentage of S&P 500 companies sued dropped to 4.4%, falling below the percentage for non-U.S. companies for the first time since 2015.

- The percentage of non-U.S. companies subject to core federal filings increased for the seventh consecutive year, rising to the second-highest level since tracking began in 1997.
- The percentage of S&P 500 companies sued in 2020 was less than the 2000–2019 yearly average of 5.5% for the first time since 2015.

Figure 29: Percentage of Companies Sued by Listing Category or Domicile—Core Federal Filings 2006–2020

Percentage of Companies Sued by Category



Source: CRSP; Yahoo Finance

Note:

1. Non-U.S. companies are defined as companies with headquarters outside the United States, Puerto Rico, and Virgin Islands. Companies were counted if they issue common stock or ADRs and are listed on the NYSE or Nasdaq.
2. Percentage of companies sued is calculated as the number of filings against unique companies in each category divided by the total number of companies in each category in a given year.

Mega Federal Filings

Mega DDL filings have a DDL of at least \$5 billion. Mega MDL filings have an MDL of at least \$10 billion. MDL and DDL are only presented for core federal filings.

- Although the number of mega DDL filings increased from eight in 2019 to 13 in 2020, total DDL from mega filings decreased by \$1 billion.
- There were 30 mega MDL filings in 2020, more than twice the historical average.
- In 2020, total MDL for mega core federal filings was \$1,309 billion, a noticeable increase from 2019 and nearly three times the 1997–2019 average.
- In 2020, the percentages of total federal DDL and MDL represented by mega filings were higher than the historical average. The MDL for mega filings represented 83% of total federal MDL, compared to the historical average of 70%. The DDL for mega filings represented 60% of total federal DDL, compared to the historical average of 54%.

The number of mega DDL and MDL filings was significantly higher than the historical average.

Figure 30: Mega Filings—Core Federal Filings

(Dollars in Billions)

	Average 1997–2019	2018	2019	2020
Mega Disclosure Dollar Loss (DDL) Filings³				
Mega DDL Filings	6	17	8	13
DDL for Mega Core Federal Filings	\$73	\$212	\$147	\$146
Percentage of Total Federal DDL	54%	64%	53%	60%
Mega Maximum Dollar Loss (MDL) Filings⁴				
Mega MDL Filings	14	27	20	30
MDL for Mega Core Federal Filings	\$461	\$963	\$825	\$1,309
Percentage of Total Federal MDL	70%	73%	71%	83%

Note:

- This figure does not present data on a combined federal and state filings basis.
- There are core filings for which data are not available to estimate MDL and DDL accurately. These core filings are excluded from MDL and DDL analysis and counts.
- Mega DDL filings have a disclosure dollar loss of at least \$5 billion.
- Mega MDL filings have a maximum dollar loss of at least \$10 billion.

Industry Comparison of Federal Filings

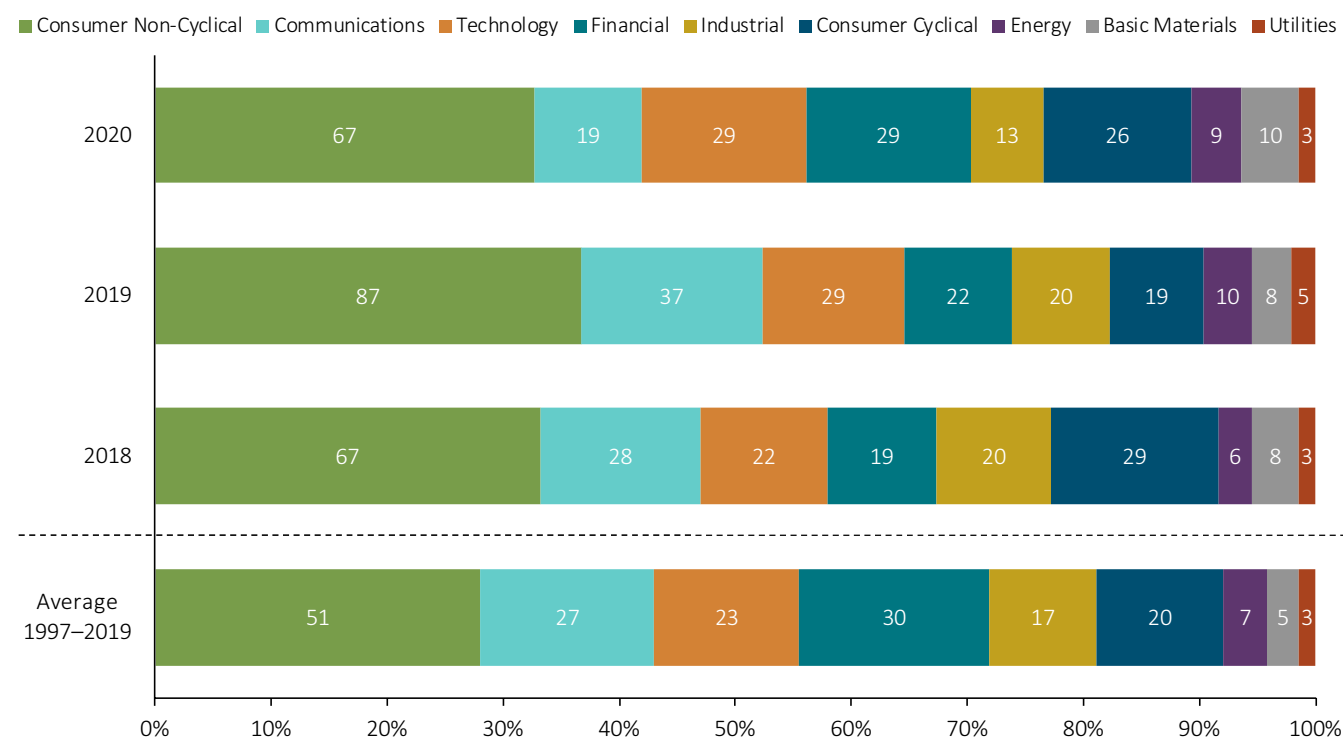
This analysis of core federal filings encompasses both smaller companies and the large capitalization companies of the S&P 500.

- The DDL from Utilities and Financial filings in 2020 was significantly higher than in the two years preceding and when compared to the 1997–2019 average (see Appendix 6).
- Although Consumer Non-Cyclical companies (primarily composed of pharmaceutical, healthcare, and biotechnology firms) had fewer filings in 2020 (67) than in 2016, 2017, and 2019, that number still surpassed the 1997–2019 average by over 31%.
- There were 19 Communications filings in 2020, far fewer than in the previous two years and also below the 1997–2019 average of 27.

- The number of Basic Materials filings in 2020 was the highest that it has been since 2017.
- From 1997 to 2019 the average number of Consumer Non-Cyclical filings was about the same as the number of Technology and Communications filings. In 2020, as in the previous two years, there were significantly more Consumer Non-Cyclical filings than Technology and Communications filings.

The majority of industries had a similar number of filings in 2020 as in the previous two years.

Figure 31: Filings by Industry—Core Federal Filings



Note:

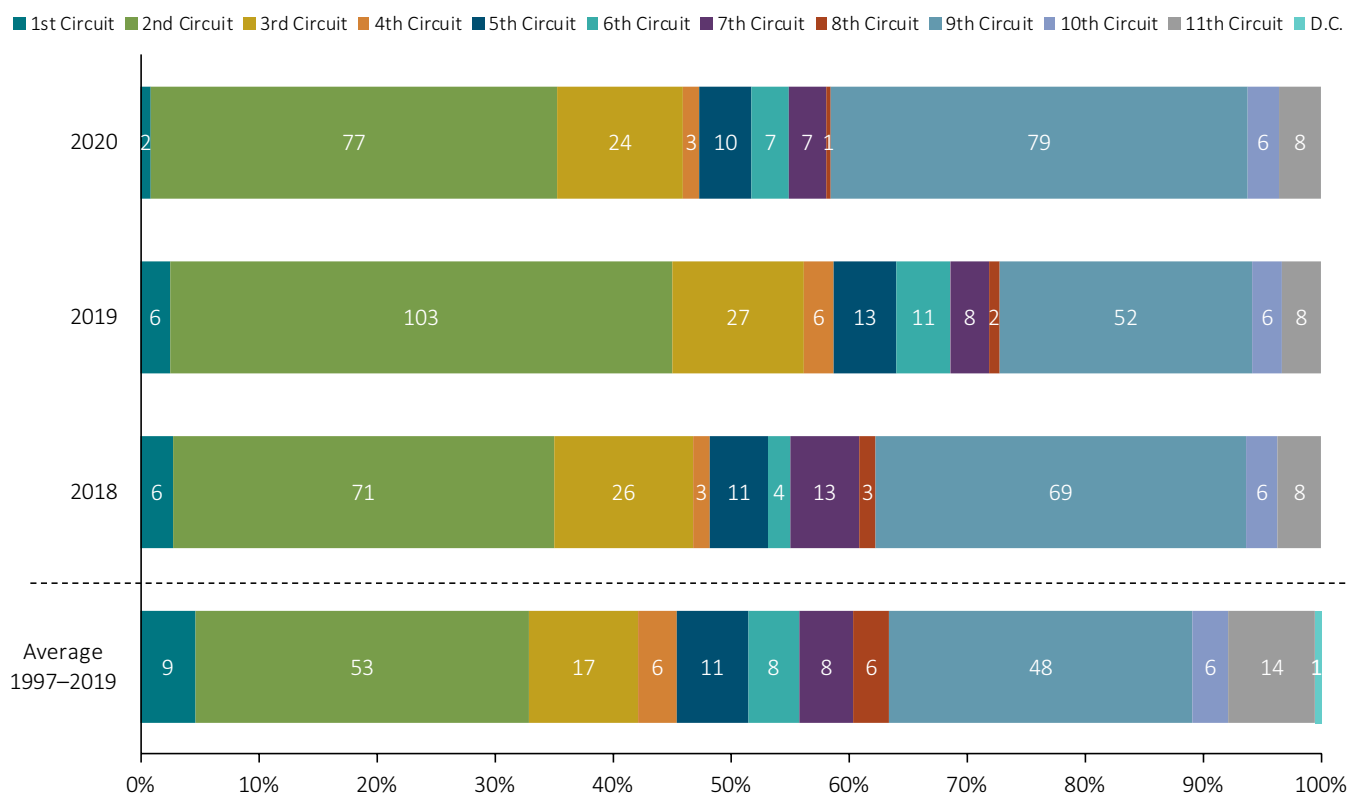
1. This analysis only considers federal filings. It does not present combined federal and state data, and cases are not identified as parallel. This is different from other figures in this report that account for filings in federal courts that also have parallel cases identified in state courts. In those analyses, when parallel cases are filed in different years, only the earlier filing date is reflected in the analysis. As a result, this figure's filing counts may not match Figures 1, 3, 4, or 5.
2. Filings with missing sector information or infrequently used sectors may be excluded. As a result, numbers in this chart may not match other total counts listed in the report.
3. Sectors are based on the Bloomberg Industry Classification System.

Federal Filings by Circuit

- The Second and Ninth Circuits combined made up 70% of all core federal filings in 2020, roughly in line with 2019 (64%) and above the 1997–2019 average of 54%.
- Core federal filings in the Ninth Circuit increased by 52% to 79 filings, the highest number on record for that circuit. Core filings in the Second Circuit decreased by 25% from the record high of 103 in 2019 to 77 filings, which is still above the 1997–2019 average of 53.
- Core federal filings in the First Circuit decreased by 67% to two filings, well below the 1997–2019 average of nine filings. DDL and MDL in this circuit were below \$1 billion.
- The total MDL for the Ninth Circuit increased from \$501 billion in 2019 to \$586 billion in 2020, three times the 1997–2019 average. See Appendix 7.
- Total MDL for the Second Circuit increased by 70% from \$360 billion in 2019 to \$612 billion in 2020. See Appendix 7.

Core federal filings in the Ninth Circuit were the highest on record, while in the Second Circuit, core federal filings fell from last year's record high.

Figure 32: Filings by Circuit—Core Federal Filings



Note: This analysis only considers federal filings. It does not present combined federal and state data, and cases are not identified as parallel. This is different from other figures in this report that account for filings in federal courts that also have parallel cases identified in state courts. In those analyses, when parallel cases are filed in different years, only the earlier filing date is reflected in the analysis. As a result, this figure's filing counts may not match Figures 1, 3, 4, or 5.

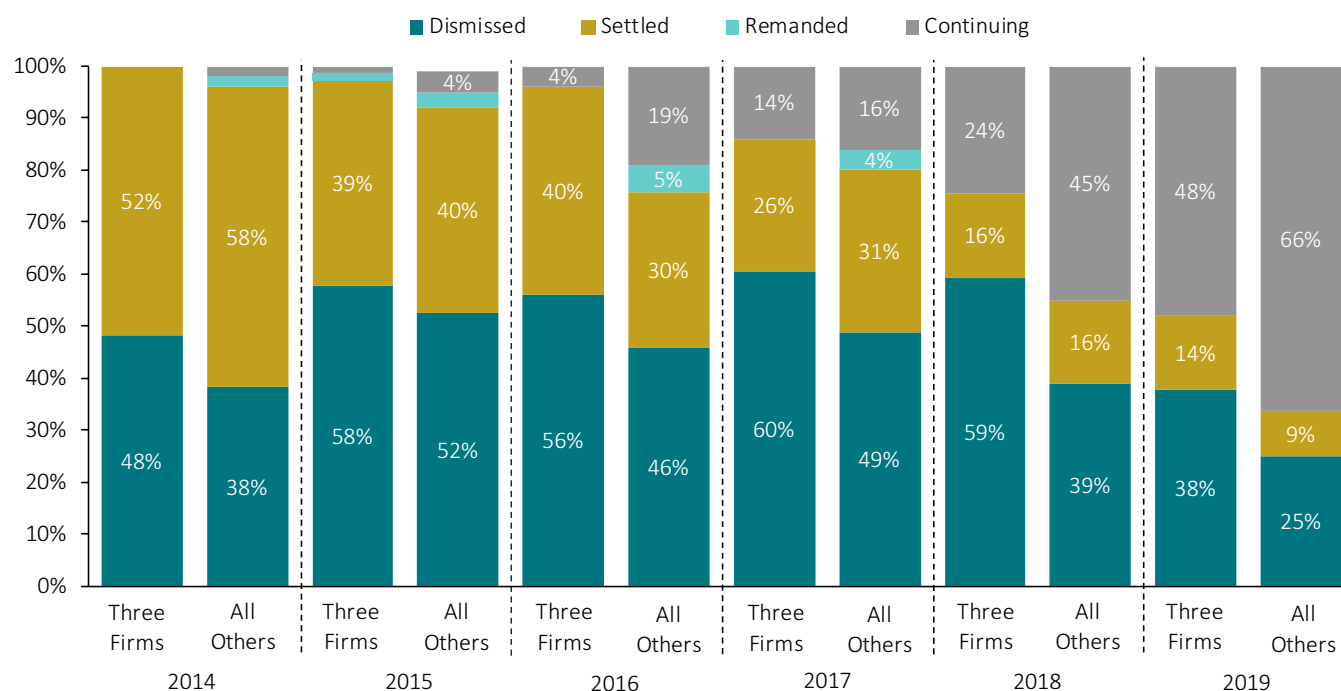
Federal Case Status by Plaintiffs' Counsel

Three law firms—The Rosen Law Firm, Pomerantz LLP, and Glancy Prongay & Murray LLP—have been responsible for more than half of first filed securities class action complaints in federal courts since 2015. See Cornerstone Research, [Securities Class Action Filings—2020 Midyear Assessment](#), Figure 23. The figure below examines case outcomes for core federal filings for which these three firms were listed as counsel of record on the operative complaint. These case outcomes are compared with filings for which other plaintiff law firms are the counsel of record.

Complaints filed by these three plaintiff law firms have been dismissed more frequently than other law firms for all years analyzed.

- From 2014 through 2019, these three firms have had 53% of their class actions dismissed, compared to 41% for all other plaintiff firms. However, a larger set of filings and more careful consideration of other factors such as circuit, court, industry, type of allegation, and other factors would be necessary to determine if these differences are statistically significant.
- Prior analysis of these three firms by Michael Klausner, Professor of Law at Stanford Law School, and Jason Hegland, Executive Director of Stanford Securities Litigation Analytics, indicated these firms had higher dismissal rates between 2006 and 2015 as well. See [“Guest Post: Deeper Trends in Securities Class Actions 2006–2015,”](#) The D&O Diary, June 23, 2016.

Figure 33: Case Status by Plaintiff Law Firm of Record on the Operative Complaint—Core Federal Filings 2014–2019



Note:

- The analysis relies on the counsel of record on the operative complaint.
- 1% of core federal filings in 2018 and 1% of core federal filings in 2019 do not have counsel of record assigned yet. These filings are not included in this analysis.
- Percentages may not sum to 100% due to rounding.

New Developments

State Court 1933 Act Claims

As reported in Cornerstone Research’s *Securities Class Action Filings—2020 Midyear Assessment*, on March 18, 2020, the Delaware Supreme Court held in *Sciabacucchi* that forum-selection provisions in corporate charters requiring that some class action securities claims under the 1933 Act be adjudicated in federal courts are enforceable.

In the last six months, four trial courts in California have enforced these federal forum-selection provisions; no trial court has ruled that they are unenforceable. In the future, other courts will likely consider this issue. Courts may also consider related issues, such as whether corporate charters can require arbitration of internal corporate claims, including those involving violations of securities laws.

SEC Guidance Regarding Disclosures of China-Based Companies Listing on U.S. Exchanges

In November 2020, the SEC’s Division of Corporation Finance issued CF Disclosure Guidance: Topic No. 10, which identified disclosure considerations for China-based companies that list on U.S. exchanges. According to the SEC, due to limitations on the SEC’s ability to enforce disclosure standards for China-based issuers, there is substantially greater risk that disclosures by such issuers will be incomplete and misleading and that investors will have substantially less recourse relative to what they have with other non-U.S. issuers. The SEC stated that China-based issuers must fully disclose material risks related to their operations in China, and identified specific disclosure guidelines.

The SEC’s guidance follows legislation and executive action that would (i) prohibit listing of securities if the issuer’s auditor has not been inspected by the Public Company Accounting Oversight Board, or when the auditor does not demonstrate sufficient resources, geographic reach, or experience; and (ii) prohibit U.S. persons from holding investments in certain Chinese companies affiliated with the Chinese military.

Surge of SPAC IPO Activity in 2020

SPACs exploded in popularity in 2020. Also known as “blank check” companies, SPACs are used as vehicles to take companies public without going through the traditional IPO process. Over half of all IPOs in 2020 involved SPACs, with over \$75.3 billion raised across 248 SPAC IPOs.¹ Although there were relatively few SPAC-related filings in 2020, that trend will likely change given the large number of 2020 SPAC IPOs.

1. Jay R. Ritter, “IPOs 2020 SPACs,” University of Florida, December 31, 2020.

Glossary

Annual Number of Class Action Filings by Location of Headquarters (formerly known as the Class Action Filings Non-U.S. Index) tracks the number of core federal filings against non-U.S. issuers (companies headquartered outside the United States) relative to total core federal filings.

Class Action Filings Index® (CAF Index®) tracks the number of federal securities class action filings.

Cohort is the group of securities class actions all filed in a particular calendar year.

Core filings are all state 1933 Act class actions and all federal securities class actions excluding those defined as M&A filings.

Cyan refers to *Cyan Inc. v. Beaver County Employees Retirement Fund*. In this March 2018 opinion, the U.S. Supreme Court ruled that 1933 Act claims may be brought to state venues and are not removable to federal court.

Disclosure Dollar Loss Index® (DDL Index®) measures the aggregate DDL for all federal and state filings over a period of time. DDL is the dollar value change in the defendant firm's market capitalization between the trading day immediately preceding the end of the class period and the trading day immediately following the end of the class period. DDL should not be considered an indicator of liability or measure of potential damages. Instead, it estimates the impact of all information revealed at the end of the class period, including information unrelated to the litigation.

Dollar Loss on Offered Shares Index™ (DLOS Index™) measures the aggregate DLOS for federal filings with only Section 11 claims and for state 1933 Act filings. DLOS is the change in the dollar value of shares acquired by class members. It is the difference in the price of offered shares (i.e., from the date of the registration statement until the complaint filing date) multiplied by the shares offered. DLOS should not be considered an indicator of liability or measure of potential damages. Instead, it estimates the impact of all information revealed between the date of the registration statement and the complaint filing date, including information unrelated to the litigation.

Filing lag is the number of days between the end of a class period and the filing date of the securities class action.

First identified complaint is the first complaint filed of one or more securities class action complaints with the same underlying allegations filed against the same defendant or set of defendants.

Halliburton II refers to *Halliburton Co. v. Erica P. John Fund Inc.*, decided June 30, 2014, by the U.S. Supreme Court.

Heat Maps of S&P 500 Securities Litigation™ analyze securities class action activity by industry sector. The analysis focuses on companies in the Standard & Poor's 500 (S&P 500) index, which comprises 500 large, publicly traded companies in all major sectors. Starting with the composition of the S&P 500 at the beginning of each year, the Heat Maps examine each sector by: (1) the percentage of these companies subject to new securities class actions in federal court during each calendar year, and (2) the percentage of the total market capitalization of these companies subject to new securities class actions in federal court during each calendar year.

Market capitalization losses measure changes to market values of the companies subject to class action filings. This report tracks market capitalization losses for defendant firms during and at the end of class periods. They are calculated for publicly traded common equity securities, closed-ended mutual funds, and exchange-traded funds where data are available. Declines in market capitalization may be driven by market, industry, and/or firm-specific factors. To the extent that the observed losses reflect factors unrelated to the allegations in class action complaints, indices based on class period losses would not be representative of potential defendant exposure in class actions. This is especially relevant in the post-*Dura* securities litigation environment. In April 2005, the U.S. Supreme Court ruled that plaintiffs in a securities class action are required to establish a causal connection between alleged wrongdoing and subsequent shareholder losses. This report tracks market capitalization losses at the end of each class period using DDL, and market capitalization losses during each class period using MDL.

Maximum Dollar Loss Index® (MDL Index®) measures the aggregate MDL for all federal and state filings over a period of time. MDL is the dollar value change in the defendant firm's market capitalization from the trading day with the highest market capitalization during the class period to the trading day immediately following the end of the class period. MDL should not be considered an indicator of liability or measure of potential damages. Instead, it estimates the impact of all information revealed during or at the end of the class period, including information unrelated to the litigation.

Mega filings include mega DDL filings, securities class action filings with a DDL of at least \$5 billion; and mega MDL filings, securities class action filings with an MDL of at least \$10 billion.

Merger and acquisition (M&A) filings are securities class actions filed in federal courts that have Section 14 claims, but no Rule 10b-5, Section 11, or Section 12(a) claims, and involve merger and acquisition transactions.

Sciabacucchi refers to *Salzberg v. Sciabacucchi*. On March 18, 2020, the Delaware Supreme Court held that forum-selection provisions in corporate charters requiring that some class action securities claims under the 1933 Act be adjudicated in federal courts are enforceable.

Securities Class Action Clearinghouse is an authoritative source of data and analysis on the financial and economic characteristics of federal securities fraud class action litigation, cosponsored by Cornerstone Research and Stanford Law School.

State 1933 Act filing is a class action filed in a state court that asserts claims under Section 11 and/or Section 12 of the Securities Act of 1933. These filings may also have Section 15 claims, but do not have Rule 10b-5 claims.

Appendices

Appendix 1: Basic Filings Metrics

Year	Class Action Filings		Disclosure Dollar Loss			Maximum Dollar Loss			U.S. Exchange-Listed Firms: Core Filings		
			DDL Total (\$ Billions)	Average (\$ Millions)	Median (\$ Millions)	MDL Total (\$ Billions)	Average (\$ Millions)	Median (\$ Millions)	Number	Number of Listed Firms Sued	Percentage of Listed Firms Sued
1997	174	174	\$42	\$272	\$57	\$145	\$940	\$405	8,113	165	2.0%
1998	242	242	\$80	\$365	\$61	\$224	\$1,018	\$294	8,190	225	2.7%
1999	209	209	\$140	\$761	\$101	\$364	\$1,978	\$377	7,771	197	2.5%
2000	216	216	\$240	\$1,251	\$119	\$761	\$3,961	\$689	7,418	205	2.8%
2001	180	180	\$198	\$1,215	\$93	\$1,487	\$9,120	\$771	7,197	168	2.3%
2002	224	224	\$201	\$989	\$136	\$2,046	\$10,080	\$1,494	6,474	204	3.2%
2003	192	192	\$77	\$450	\$100	\$575	\$3,363	\$478	5,999	181	3.0%
2004	228	228	\$144	\$739	\$108	\$726	\$3,722	\$498	5,643	210	3.7%
2005	182	182	\$93	\$595	\$154	\$362	\$2,321	\$496	5,593	168	3.0%
2006	120	120	\$52	\$496	\$109	\$294	\$2,827	\$413	5,525	114	2.1%
2007	177	177	\$158	\$1,013	\$156	\$700	\$4,489	\$715	5,467	158	2.9%
2008	224	224	\$221	\$1,516	\$208	\$816	\$5,591	\$1,077	5,339	170	3.2%
2009	164	157	\$84	\$830	\$138	\$550	\$5,447	\$1,066	5,042	118	2.3%
2010	174	135	\$73	\$691	\$146	\$474	\$4,515	\$598	4,764	107	2.2%
2011	189	146	\$115	\$850	\$92	\$523	\$3,876	\$439	4,660	127	2.7%
2012	154	142	\$97	\$758	\$151	\$405	\$3,139	\$647	4,529	119	2.6%
2013	165	152	\$104	\$750	\$153	\$278	\$2,011	\$532	4,411	137	3.1%
2014	170	158	\$56	\$378	\$165	\$220	\$1,489	\$528	4,416	144	3.3%
2015	217	183	\$120	\$671	\$144	\$415	\$2,332	\$512	4,578	169	3.7%
2016	288	204	\$106	\$554	\$167	\$848	\$4,418	\$1,038	4,593	188	4.1%
2017	412	214	\$125	\$637	\$149	\$512	\$2,613	\$665	4,411	186	4.2%
2018	420	238	\$331	\$1,584	\$298	\$1,317	\$6,299	\$1,063	4,406	211	4.8%
2019	427	267	\$282	\$1,190	\$216	\$1,187	\$5,008	\$1,010	4,318	237	5.5%
2020	334	234	\$245	\$1,209	\$185	\$1,584	\$7,803	\$1,008	4,514	193	4.3%
Average (1997–2019)	224	190	\$136	\$807	\$140	\$662	\$3,937	\$687	5,602	170	3.1%

Note:

1. 1933 Act filings in state courts are included in the data beginning in 2010.
2. Average and median numbers are calculated only for filings with MDL and DDL data. Filings without MDL and DDL data include M&A-only filings, initial coin offering filings, and other filings where calculations of MDL and DDL are non-obvious.
3. The number and percentage of U.S. exchange-listed firms sued are based on core filings and include companies that were subject to both an M&A filing and a core filing in the same year.

Appendix 2A: S&P 500 Securities Litigation—Percentage of S&P 500 Companies Subject to Core Federal Filings

Year	Consumer Discretionary	Consumer Staples	Energy/ Materials	Financials/ Real Estate	Health Care	Industrials	Telecomm./ Comm./IT	Utilities	All S&P 500 Companies
2001	2.4%	8.3%	0.0%	1.4%	7.1%	0.0%	18.0%	7.9%	5.6%
2002	10.2%	2.9%	3.1%	16.7%	15.2%	6.0%	11.0%	40.5%	12.0%
2003	4.6%	2.9%	1.7%	8.6%	10.4%	3.0%	5.6%	2.8%	5.2%
2004	3.4%	2.7%	1.8%	19.3%	10.6%	8.5%	3.2%	5.7%	7.2%
2005	10.3%	8.6%	1.7%	7.3%	10.7%	1.8%	6.7%	3.0%	6.6%
2006	4.4%	2.8%	0.0%	2.4%	6.9%	0.0%	8.1%	0.0%	3.6%
2007	5.7%	0.0%	0.0%	10.3%	12.7%	5.8%	2.3%	3.1%	5.4%
2008	4.5%	2.6%	0.0%	31.2%	13.7%	3.6%	2.5%	3.2%	9.2%
2009	3.8%	4.9%	1.5%	9.5%	3.7%	6.9%	1.2%	0.0%	4.2%
2010	5.1%	0.0%	4.3%	10.3%	13.5%	0.0%	2.4%	0.0%	4.8%
2011	3.8%	2.4%	0.0%	1.2%	2.0%	1.7%	7.1%	0.0%	2.6%
2012	4.9%	2.4%	2.7%	3.7%	1.9%	1.6%	3.8%	0.0%	3.0%
2013	8.4%	0.0%	0.0%	0.0%	5.7%	0.0%	9.1%	0.0%	3.4%
2014	1.2%	0.0%	1.3%	1.2%	0.0%	4.7%	0.0%	0.0%	1.2%
2015	0.0%	5.0%	0.0%	1.2%	1.9%	0.0%	4.2%	3.4%	1.6%
2016	3.6%	2.6%	4.5%	6.9%	17.9%	6.1%	6.8%	3.4%	6.6%
2017	8.5%	2.7%	3.3%	3.3%	8.3%	8.7%	8.5%	7.1%	6.4%
2018	10.0%	11.8%	1.8%	7.0%	16.1%	8.8%	12.7%	7.1%	9.4%
2019	3.1%	12.1%	3.7%	2.0%	12.9%	10.1%	10.0%	6.9%	7.2%
2020	8.1%	3.1%	1.9%	5.3%	6.3%	2.7%	2.0%	7.1%	4.4%
Average 2001–2019	5.2%	3.8%	1.6%	7.6%	9.1%	4.2%	6.5%	5.2%	5.5%

Appendix 2B: S&P 500 Securities Litigation—Percentage of Market Capitalization of S&P 500 Companies Subject to Core Federal Filings

Year	Consumer Discretionary	Consumer Staples	Energy/ Materials	Financials/ Real Estate	Health Care	Industrials	Telecomm./ Comm./IT	Utilities	All S&P 500 Companies
2001	1.3%	6.3%	0.0%	0.8%	5.4%	0.0%	32.6%	17.4%	10.9%
2002	24.7%	0.3%	1.2%	29.2%	35.2%	13.3%	9.1%	51.0%	18.8%
2003	2.0%	2.3%	0.4%	19.9%	16.3%	4.6%	1.7%	4.3%	8.0%
2004	7.9%	0.1%	29.7%	46.1%	24.1%	8.8%	1.2%	4.8%	17.7%
2005	5.7%	11.4%	1.6%	22.2%	10.1%	5.6%	10.3%	5.6%	10.7%
2006	8.9%	0.8%	0.0%	8.2%	18.1%	0.0%	8.3%	0.0%	6.7%
2007	4.4%	0.0%	0.0%	18.1%	22.5%	2.2%	3.4%	5.5%	8.2%
2008	7.2%	2.6%	0.0%	55.0%	20.0%	26.4%	1.4%	4.0%	16.2%
2009	1.9%	3.9%	0.8%	30.7%	1.7%	23.2%	0.3%	0.0%	7.6%
2010	4.9%	0.0%	5.2%	31.1%	32.7%	0.0%	5.9%	0.0%	11.1%
2011	4.6%	0.8%	0.0%	6.9%	0.7%	2.1%	13.4%	0.0%	5.0%
2012	1.6%	14.0%	0.9%	11.0%	0.8%	1.2%	2.2%	0.0%	4.3%
2013	4.4%	0.0%	0.0%	0.0%	4.4%	0.0%	16.6%	0.0%	4.7%
2014	2.5%	0.0%	0.2%	0.3%	0.0%	1.7%	0.0%	0.0%	0.6%
2015	0.0%	1.9%	0.0%	3.0%	3.1%	0.0%	7.0%	3.7%	2.8%
2016	2.8%	1.0%	19.8%	11.9%	13.2%	8.7%	12.3%	4.4%	10.0%
2017	8.2%	6.7%	2.3%	1.5%	2.7%	22.3%	4.4%	9.6%	6.1%
2018	4.7%	15.2%	1.4%	12.5%	26.3%	19.4%	19.4%	6.5%	14.9%
2019	0.5%	9.1%	1.2%	2.2%	6.6%	21.6%	18.0%	7.9%	10.0%
2020	2.2%	1.8%	0.4%	16.9%	4.7%	4.9%	1.6%	6.6%	4.3%
Average 2001–2019	4.8%	4.4%	2.8%	14.3%	12.3%	9.3%	10.4%	6.1%	9.0%

Note: Average figures are calculated as the sum of the market capitalization subject to core filings in a given sector from 2001 to 2019 divided by the sum of market capitalization in that sector from 2001 to 2019

Appendix 3: M&A Federal Filings Overview

Year	M&A Filings	M&A Case Status					Case Status of All Other Federal Filings				
		Dismissed	Settled	Remanded	Continuing	Trial Verdict	Dismissed	Settled	Remanded	Continuing	Trial Verdict
2010	39	33	6	0	0	0	69	65	1	1	0
2011	43	40	3	0	0	0	69	75	1	0	0
2012	12	9	3	0	0	0	68	65	2	4	0
2013	13	7	6	0	0	0	86	64	1	1	0
2014	12	9	3	0	0	0	65	87	2	2	0
2015	34	27	7	0	0	0	94	68	4	6	1
2016	84	67	14	0	3	0	93	63	6	25	0
2017	198	189	5	1	3	0	113	61	5	34	0
2018	182	173	4	0	5	0	102	35	0	83	0
2019	160	148	0	0	12	0	73	26	0	143	0
2020	100	88	0	0	12	0	12	3	0	209	0

Note:

1. The Securities Class Action Clearinghouse began tracking M&A filings as a separate category in 2009.
2. Case status is as of the end of 2020.
3. Since 2010, there have only been two cases tried to a verdict, both of which were core filings. One of these cases settled after trial and is categorized as settled in the data.

Appendix 4: Case Status by Year—Core Federal Filings

Filing Year	In the First Year				In the Second Year				In the Third Year				Total Resolved within Three Years
	Settled	Dismissed	Other	Total Resolved	Settled	Dismissed	Other	Total Resolved	Settled	Dismissed	Other	Total Resolved	
1997	0.0%	7.5%	0.6%	8.0%	14.9%	8.6%	0.0%	31.6%	16.7%	4.0%	0.0%	52.3%	
1998	0.8%	7.4%	0.0%	8.3%	16.1%	12.4%	0.0%	36.8%	15.7%	7.9%	0.0%	60.3%	
1999	0.5%	6.7%	0.0%	7.2%	11.0%	12.0%	0.0%	30.1%	18.2%	9.1%	0.0%	57.4%	
2000	1.9%	4.2%	0.0%	6.0%	11.6%	13.0%	0.0%	30.6%	15.7%	10.6%	0.5%	57.4%	
2001	1.7%	6.7%	0.0%	8.3%	11.7%	10.6%	0.0%	30.6%	17.8%	5.0%	0.0%	53.3%	
2002	0.9%	5.8%	0.4%	7.1%	6.7%	9.4%	0.0%	23.2%	15.2%	11.6%	0.0%	50.0%	
2003	0.5%	7.8%	0.0%	8.3%	7.8%	13.5%	0.0%	29.7%	14.6%	14.6%	0.0%	58.9%	
2004	0.0%	10.5%	0.0%	10.5%	9.6%	16.2%	0.0%	36.4%	12.3%	9.6%	0.0%	58.3%	
2005	0.5%	11.5%	0.0%	12.1%	8.2%	19.8%	0.0%	40.1%	17.6%	8.8%	0.0%	66.5%	
2006	0.8%	9.2%	0.0%	10.0%	8.3%	16.7%	0.0%	35.0%	14.2%	6.7%	0.0%	55.8%	
2007	0.6%	6.8%	0.0%	7.3%	7.9%	13.0%	0.0%	28.2%	17.5%	14.7%	0.0%	60.5%	
2008	0.0%	13.0%	0.9%	13.9%	3.6%	18.4%	0.0%	35.9%	9.9%	11.2%	0.0%	57.0%	
2009	0.0%	9.6%	0.0%	9.6%	4.5%	19.7%	0.0%	33.8%	8.3%	6.4%	0.0%	48.4%	
2010	1.5%	11.8%	0.7%	14.0%	7.4%	15.4%	0.0%	36.8%	3.7%	14.7%	0.0%	55.1%	
2011	0.0%	11.7%	0.7%	12.4%	2.8%	15.9%	0.0%	31.0%	18.6%	12.4%	0.0%	62.1%	
2012	0.7%	12.2%	1.4%	14.4%	4.3%	22.3%	0.0%	41.0%	8.6%	10.1%	0.0%	59.7%	
2013	0.0%	17.1%	0.7%	17.8%	5.3%	19.7%	0.0%	42.8%	9.2%	9.9%	0.0%	61.8%	
2014	0.6%	7.7%	1.3%	9.6%	5.1%	18.6%	0.0%	33.3%	9.0%	10.3%	0.0%	52.6%	
2015	0.0%	13.9%	2.3%	16.2%	2.3%	21.4%	0.0%	39.9%	9.2%	6.4%	0.0%	55.5%	
2016	0.0%	12.8%	1.6%	14.4%	4.3%	17.1%	0.5%	36.4%	9.1%	9.1%	1.1%	55.6%	
2017	0.0%	18.8%	1.9%	20.7%	2.3%	16.4%	0.5%	39.9%	12.7%	10.8%	0.0%	63.4%	
2018	0.0%	12.7%	0.0%	12.7%	5.9%	21.8%	0.0%	40.5%	10.0%	11.8%	0.0%	62.3%	
2019	0.4%	14.9%	0.0%	15.3%	10.3%	15.3%	0.0%	40.9%	-	-	-	-	
2020	1.3%	5.4%	0.0%	6.7%	-	-	-	-	-	-	-	-	

Note: Percentages may not sum due to rounding. Percentages below the dashed lines indicate cohorts for which data are not complete. “Other” represents cases that were remanded or went to trial. Case Status is reported as of the last significant docket update as determined by the Cornerstone Research and Stanford Law School Securities Class Action Clearinghouse.

Appendix 5: Litigation Exposure for IPOs in the Given Periods—Core Filings

Years Since IPO	Cumulative Exposure			Incremental Exposure		
	2009–2019	2001–2008	1996–2000	2009–2019	2001–2008	1996–2000
1	6.3%	3.8%	2.0%	6.3%	3.8%	2.0%
2	11.5%	6.5%	5.9%	5.1%	2.7%	4.0%
3	15.8%	8.6%	8.8%	4.3%	2.1%	2.9%
4	19.2%	10.8%	11.5%	3.5%	2.2%	2.6%
5	22.7%	12.2%	14.6%	3.5%	1.4%	3.1%
6	25.3%	13.6%	16.7%	2.6%	1.5%	2.2%
7	27.5%	15.3%	19.3%	2.2%	1.6%	2.6%
8	29.0%	17.0%	21.5%	1.5%	1.8%	2.2%
9	32.0%	18.1%	24.0%	3.1%	1.1%	2.5%
10	-	19.9%	25.7%	-	1.8%	1.7%

Note:

1. The post-crisis IPO cumulative litigation exposure is not presented for 10 years after the IPO due to limited data for cohorts with an IPO date toward the end of this period. 1933 Act filings that are exclusively in the state courts enter into this analysis beginning in 2010.
2. Cumulative litigation exposure correcting for survivorship bias is calculated using the following formula:

(cumulative litigation exposure in year t) = $1 - \prod_{i=1}^t (1 - p_i)$, where:

$$p_i = \frac{\text{number of companies sued in year } i}{\text{number of companies surviving at the end of year } (i-1)}$$

Appendix 6: Filings by Industry—Core Federal Filings

(Dollars in Billions)

Industry	Class Action Filings				Disclosure Dollar Loss				Maximum Dollar Loss			
	Average 1997–2019	2018	2019	2020	Average 1997–2019	2018	2019	2020	Average 1997–2019	2018	2019	2020
Financial	30	19	22	29	\$18	\$25	\$10	\$43	\$108	\$138	\$41	\$784
Consumer Non-Cyclical	51	67	87	67	\$40	\$104	\$68	\$68	\$157	\$435	\$324	\$309
Industrial	17	20	20	13	\$13	\$28	\$22	\$16	\$50	\$240	\$105	\$45
Technology	23	22	29	29	\$23	\$65	\$100	\$69	\$95	\$150	\$426	\$126
Consumer Cyclical	20	29	19	26	\$10	\$28	\$9	\$12	\$52	\$120	\$38	\$125
Communications	27	28	37	19	\$24	\$65	\$55	\$16	\$148	\$166	\$163	\$98
Energy	7	6	10	9	\$4	\$1	\$5	\$5	\$22	\$4	\$25	\$40
Basic Materials	5	8	8	10	\$2	\$10	\$9	\$4	\$15	\$33	\$23	\$15
Utilities	3	3	5	3	\$1	\$3	\$2	\$11	\$10	\$25	\$20	\$25
Unknown/ Unclassified	3	18	5	19	\$0	\$0	\$0	\$1	\$0	\$2	\$0	\$4
Total	186	220	242	224	\$136	\$330	\$280	\$244	\$657	\$1,311	\$1,165	\$1,571

Note: Figures may not sum due to rounding.

Appendix 7: Filings by Circuit—Core Federal Filings

(Dollars in Billions)

Circuit	Class Action Filings				Disclosure Dollar Loss				Maximum Dollar Loss			
	Average 1997–2019	2018	2019	2020	Average 1997–2019	2018	2019	2020	Average 1997–2019	2018	2019	2020
1st	9	6	6	2	\$7	\$3	-\$1	\$0	\$21	\$18	\$30	\$0
2nd	53	71	103	77	\$44	\$88	\$82	\$40	\$234	\$494	\$360	\$612
3rd	17	26	27	24	\$18	\$44	\$18	\$21	\$68	\$190	\$99	\$107
4th	6	3	6	3	\$2	\$3	\$1	\$1	\$12	\$11	\$9	\$4
5th	11	11	13	10	\$7	\$3	\$4	\$5	\$35	\$11	\$20	\$48
6th	8	4	11	7	\$7	\$6	\$8	\$13	\$26	\$19	\$24	\$34
7th	8	13	8	7	\$8	\$11	\$29	\$10	\$31	\$50	\$106	\$105
8th	6	3	2	1	\$3	\$2	\$2	\$0	\$12	\$7	\$5	\$1
9th	48	69	52	79	\$33	\$162	\$133	\$145	\$181	\$489	\$501	\$586
10th	6	6	6	6	\$2	\$2	\$2	\$1	\$12	\$9	\$7	\$13
11th	14	8	8	8	\$5	\$5	\$1	\$7	\$21	\$14	\$4	\$61
D.C.	1	0	0	0	\$1	\$0	\$0	\$0	\$3	\$0	\$0	\$0
Total	186	220	242	224	\$136	\$330	\$280	\$244	\$657	\$1,311	\$1,165	\$1,571

Note: Figures may not sum due to rounding.

Appendix 8: Filings by Exchange Listing—Core Federal Filings

	Average (1997–2019)		2019		2020	
	NYSE/Amex	Nasdaq	NYSE	Nasdaq	NYSE	Nasdaq
Class Action Filings	91	113	193	187	121	175
Core Filings	76	94	116	111	85	112
Disclosure Dollar Loss						
DDL Total (\$ Billions)	\$89	\$47	\$115	\$164	\$121	\$121
Average (\$ Millions)	\$1,277	\$501	\$1,069	\$1,543	\$1,526	\$1,128
Median (\$ Millions)	\$276	\$108	\$338	\$150	\$524	\$129
Maximum Dollar Loss						
MDL Total (\$ Billions)	\$426	\$227	\$541	\$623	\$1,136	\$413
Average (\$ Millions)	\$6,076	\$2,420	\$5,006	\$5,874	\$14,380	\$3,862
Median (\$ Millions)	\$1,368	\$482	\$1,758	\$735	\$2,588	\$651

Note:

1. Average and median numbers are calculated only for filings with MDL and DDL data.
2. NYSE/Amex was renamed NYSE MKT in May 2012.

Research Sample

- The Securities Class Action Clearinghouse, cosponsored by Cornerstone Research and Stanford Law School, has identified 5,911 federal securities class action filings between January 1, 1996, and December 31, 2020 (securities.stanford.edu). The analysis in this report is based on data identified by Stanford as of January 10, 2021.
- The sample used in this report includes federal filings that typically allege violations of Sections 11 or 12 of the Securities Act of 1933, or Sections 10(b) or 14(a) of the Securities Exchange Act of 1934.
- The sample is referred to as the “classic filings” sample and excludes IPO allocation, analyst, and mutual fund filings (313, 68, and 25 filings, respectively).
- Multiple filings related to the same allegations against the same defendant(s) are consolidated in the database through a unique record indexed to the first identified complaint.
- In addition to federal filings, class actions filed in state courts since January 1, 2010, alleging violations of the Securities Act of 1933 are also separately tracked.
- An additional 186 state class action filings in state courts from January 1, 2010, to December 31, 2020, have also been identified.

The views expressed in this report are solely those of the authors, who are responsible for the content, and do not necessarily represent the views of Cornerstone Research.

The authors request that you reference Cornerstone Research and the Stanford Law School Securities Class Action Clearinghouse in any reprint of the information or figures included in this study.

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Cornerstone Research

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Exhibit 12

25 January 2021



Recent Trends in Securities Class Action Litigation: 2020 Full-Year Review

COVID-19-Related Filings Accounted for 10% of Total Filings

Filings Declined, Driven Primarily by Fewer Merger Objections Filed

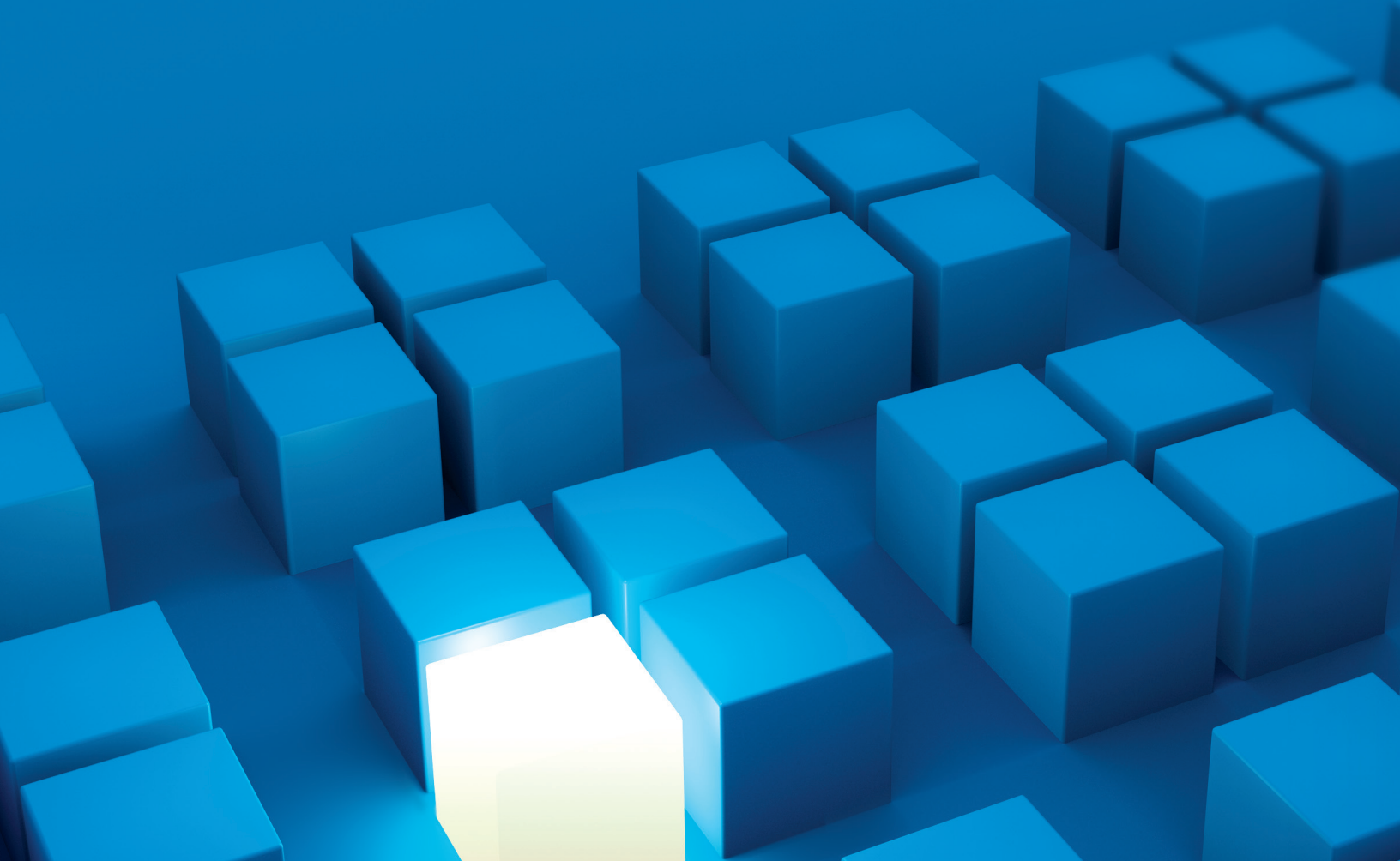
Even After Excluding “Mega” Settlements, Recent Settlement Values Remained High

By Janeen McIntosh and Svetlana Starykh

Foreword

I am excited to share NERA's Recent Trends in Securities Class Action Litigation: 2020 Full-Year Review. This year's edition builds on work carried out over many years by members of NERA's Securities and Finance Practice. In this year's report, we continue our analyses of trends in filings and resolutions and present information on new developments, including case filings related to COVID-19. Although space does not permit us to present all the analyses the authors have undertaken while working (remotely!) on this year's edition, we hope you will contact us if you want to learn more about our work in and related to securities litigation. On behalf of NERA's Securities and Finance Practice, I thank you for taking the time to review our work and hope you find it informative.

Dr. David Tabak
Managing Director

A handwritten signature in white ink, appearing to read 'D. Tabak', is positioned above a decorative graphic of blue cubes.

Recent Trends in Securities Class Action Litigation: 2020 Full-Year Review

COVID-19-Related Filings Accounted for 10% of Total Filings

Filings Declined, Driven Primarily by Fewer Merger Objections Filed

Even After Excluding “Mega” Settlements, Recent Settlement Values Remained High

By Janeen McIntosh and Svetlana Starykh¹

25 January 2021

Introduction and Summary

There were 326 federal securities class actions filed in 2020, a decline of 22% from 2019.² Despite this decline, filings for 2020 remained higher than pre-2017 levels, with the exception of 2001, when numerous IPO ladder cases were filed. In addition to a decline in the aggregate number of new cases filed, there was also a decline within each of the five types of cases we consider, though the decline within each category of cases was not consistent in magnitude. As a result, the percentage of new filings that were Rule 10b-5, Section 11, and/or Section 12 cases increased to 64% in 2020. As in 2019, in 2020, the electronic technology and technology services sector had the most securities class action filings. Of cases filed in 2020, 23% were filed against defendants in this sector, followed closely by defendants in the health technology and services sector, which accounted for 22% of new filings. For the first time in the five years ending December 2020, claims related to accounting issues, regulatory issues, or missed earnings guidance were not the most common allegation included in federal securities class action complaints. Instead, for cases filed in 2020, 35% of complaints included an allegation related to misled future performance. The Second, Third, and Ninth Circuits continue to represent a significant proportion of new cases filed in 2020, accounting for more than three-fourths of filings.

The emergence of the COVID-19 pandemic has led to associated filings. Since March 2020, when the first such lawsuit was filed, there have been 33 cases filed with COVID-19-related claims included in the complaint through December 2020. Nearly 25% of these COVID-19 case filings were against defendants in the health technology and health services sector—the highest for any sector—and 21% were filed against defendants in the finance sector.

In 2020, 320 cases were resolved, marking a slight increase from the total number of cases resolved in 2019, but remaining below the number of cases resolved in 2017 and 2018. Despite 2020 aggregate resolutions falling within the historical range for 2011–2019, both the number of cases settled and the number of cases dismissed reached 10-year record levels—settled cases reaching a record low and dismissed cases reaching a record high.

The average settlement value in 2020 was \$44 million, more than a 50% increase over the 2019 average of \$28 million but still below the 2018 value. Limiting to settlements under \$1 billion, the 2020 average settlement value was \$30 million, which is lower than the overall average of \$44

million after excluding the American Realty Capital Properties settlement of \$1.025 billion. Excluding the American Realty Capital Properties settlement, the median annual settlement value for 2020 was \$13 million, the highest recorded median value in the last 10 years.

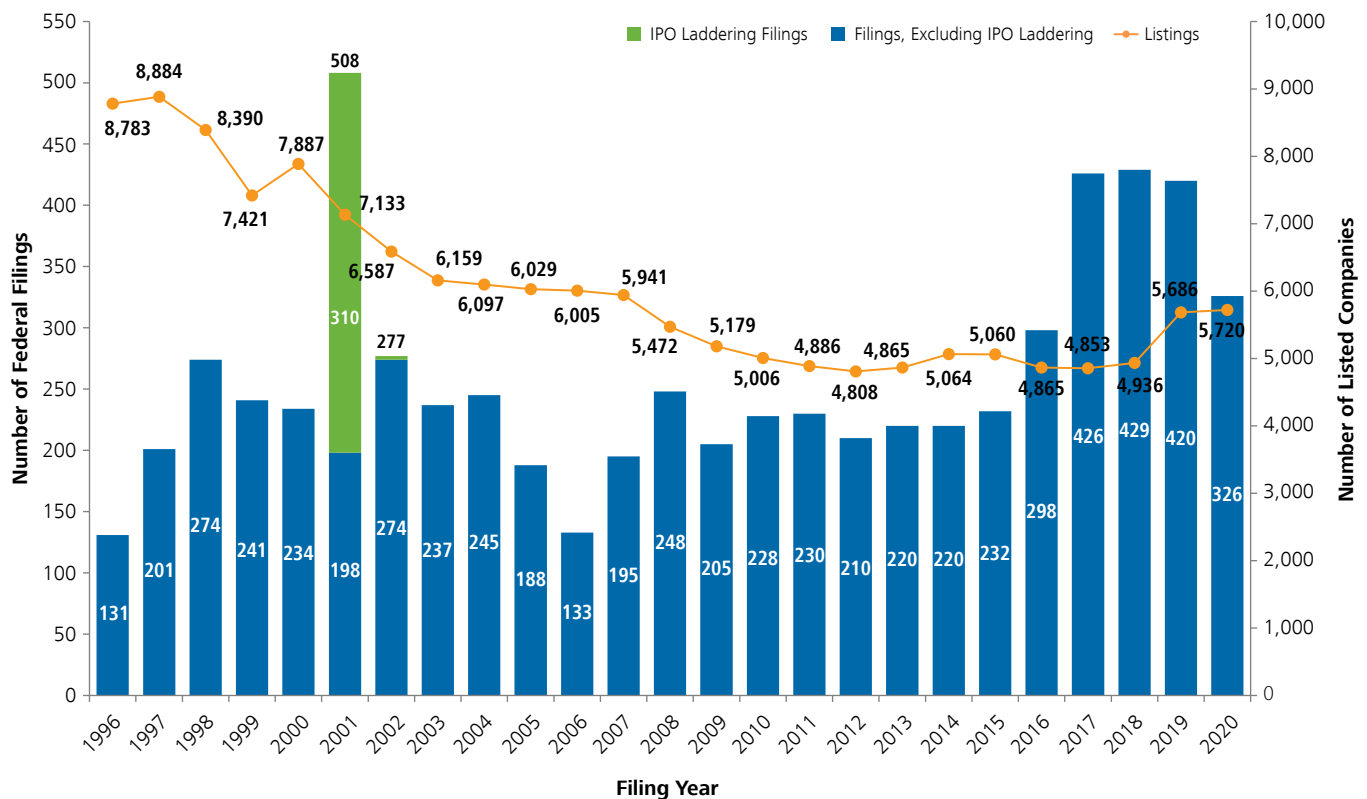
Trends in Filings

Trend in Federal Cases Filed

For the first time since 2016, annual new securities class action filings declined to less than 400 cases.³ Between 2015 and 2017, new filings grew significantly, by approximately 80%, and remained stable with between 420 and 430 annual filings from 2017 to 2019. There were 326 new case filed in 2020, which, despite the decline, is still higher than the average of 223 observed in the 2010–2015 period. Whether this decline in new filings is the end of the general higher level of filings observed in recent years or a short-term byproduct of the implications of the COVID-19 pandemic is yet to be determined. See Figure 1.

As of October 2020, there were 5,720 companies listed on the NYSE and Nasdaq exchanges.⁴ The increase in the number of listed companies in 2020 is a continuation of a general growth trend since 2017. As a result of the decline in the number of new filings and the growth in the number of listed companies in 2020, the ratio of new filings to listed companies declined to 5.7%, the lowest ratio in the last five years. However, this ratio remains higher than the ratios in the first 20 years following the implementation of the PSLRA in 1995.

Figure 1. **Federal Filings and Number of Companies Listed in the United States**
January 1996–December 2020

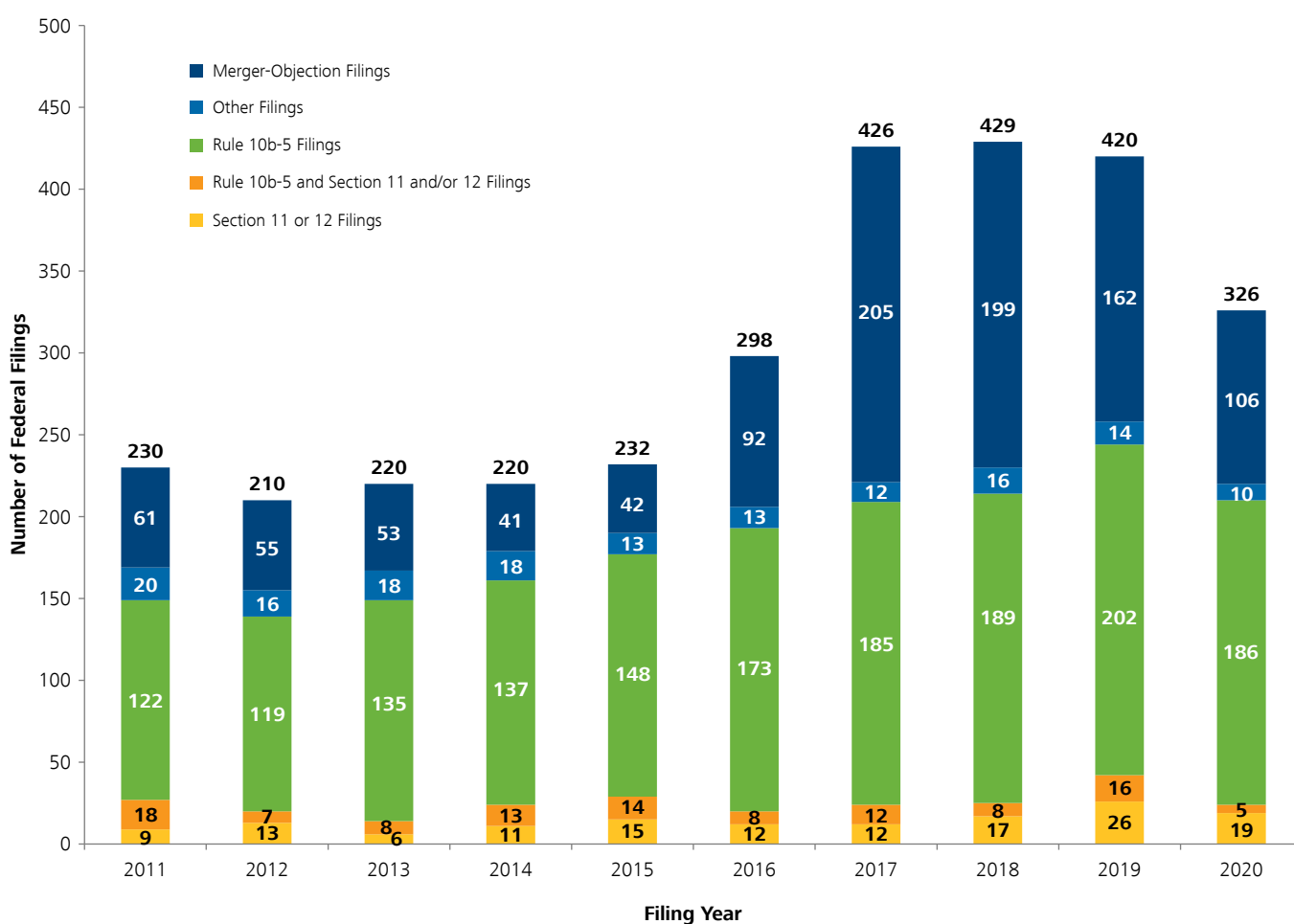


Note: Listed companies include those listed on the NYSE and Nasdaq. Listings data obtained from World Federation of Exchanges (WFE). The 2020 listings data is as of October 2020.

Federal Filings by Type

The decline in federal cases differed by type of case with the largest percentage decline observed among the Rule 10b-5 and Section 11 or Section 12 category of cases. Despite differences in the magnitude of change over the past 12 months, collectively and within each individual category, federal filings of securities class action (SCA) suits decreased. New filings of Rule 10b-5 and Section 11 or Section 12 cases in 2020 declined by more than 65% when compared to 2019. Filings of merger objections, other securities class action cases, and Section 11/Section 12 cases each declined by between 25% and 35%, while Rule 10b-5 cases declined by less than 10%. As a result of the relatively low level of decline in Rule 10b-5 cases, the proportion of new filings that were Rule 10b-5, Section 11, and/or Section 12 cases (standard cases) increased from 58% of new filings in 2019 to 64% of new filings in 2020. See Figure 2.

Figure 2. **Federal Filings by Type**
January 2011–December 2020



Federal Filings by Sector

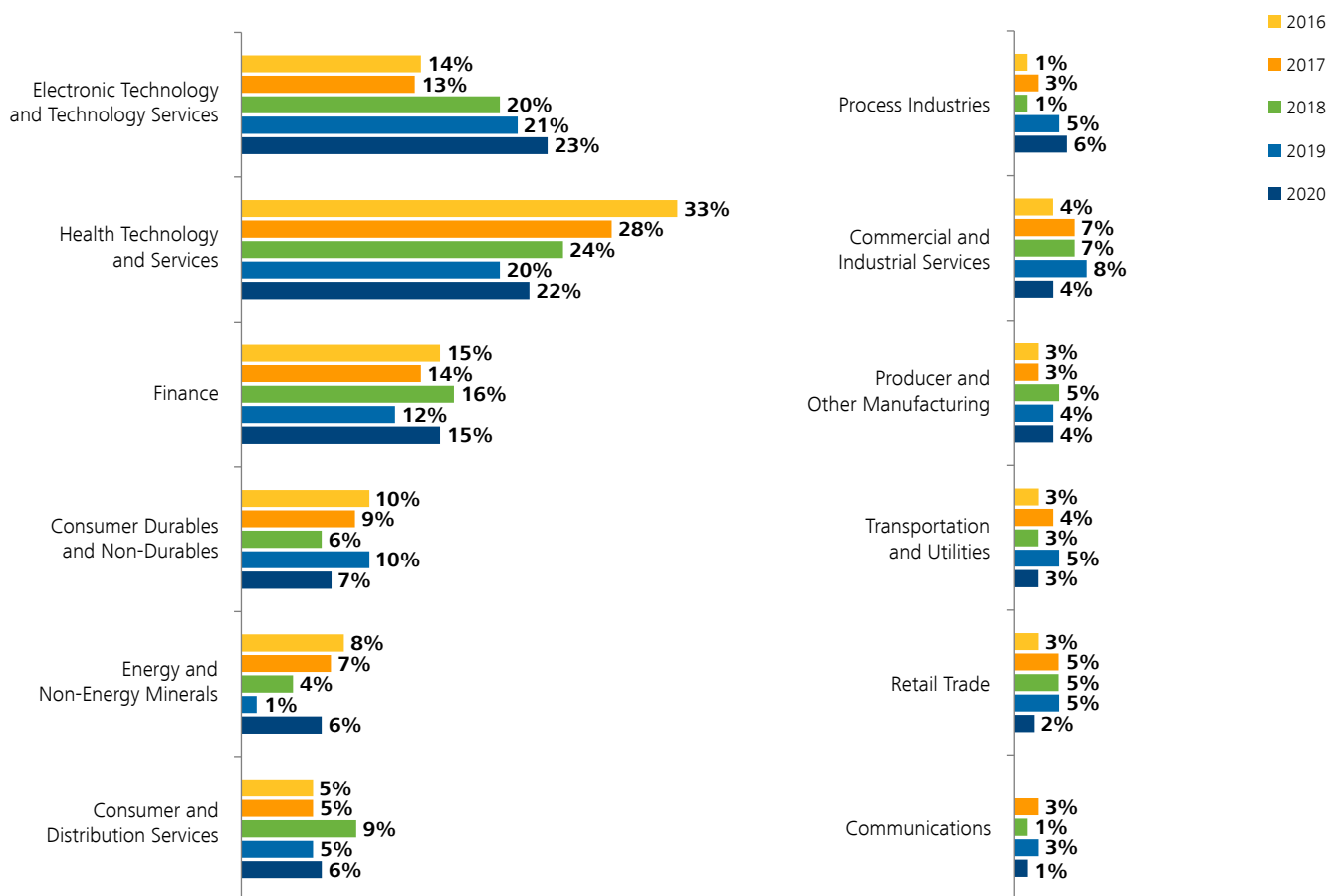
Over the 2015–2018 period, the largest proportion of SCA suits filed were against defendants in the health technology and services sector. Because of a gradual downward trend in the proportion of cases filed against companies of this sector between 2016 and 2019, and an accompanying growth in the proportion of cases filed against defendants in the electronic technology and technology services sector, in 2020, the electronic technology and technology services sector represented the largest proportion of new cases filed. In 2020, 23% of filings were against defendants in this sector, followed closely by defendants in the health technology and services sector, which accounted for 22% of new filings.

The finance sector observed an increase in the proportion of cases filed against defendants in this sector, from 12% in 2019 to 15% in 2020, while defendants in the consumer durables and non-durables sector observed a decline from 10% to 7%. The energy and non-energy minerals, consumer and distribution services, and process industries sectors each accounted for at least 5% of cases filed in 2020. See Figure 3.

Figure 3. **Percentage of Federal Filings by Sector and Year**

Excludes Merger Objections

January 2016–December 2020

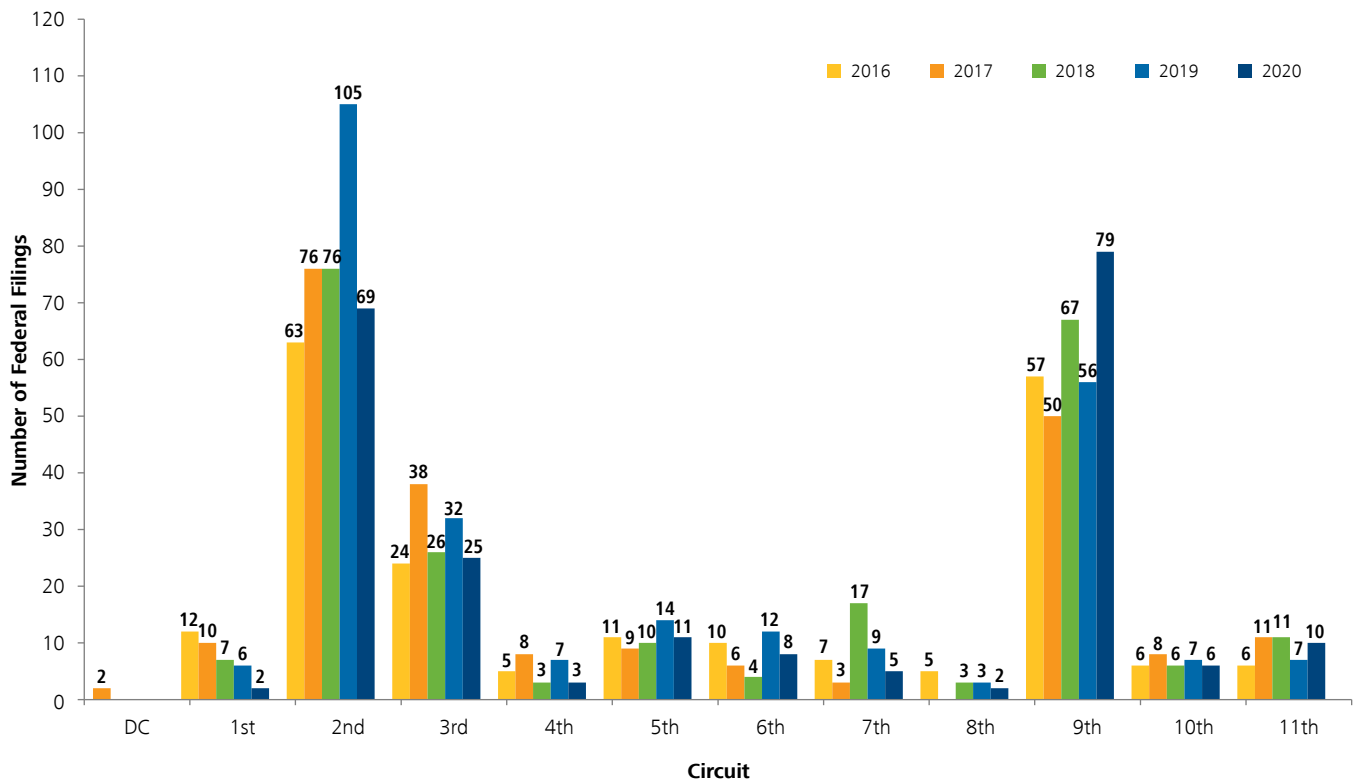


Note: This analysis is based on the FactSet Research Systems, Inc. economic sector classification. Some of the FactSet economic sectors are combined for presentation.

Federal Filings by Circuit

Historically, the Second Circuit—which includes Connecticut, New York, and Vermont—has received the highest number of cases filed. In 2019, we observed a spike in new non-merger-objection filings in the Second Circuit, a pattern that did not persist in 2020. Over the last 12 months, only 69 new cases were filed in the Second Circuit, the lowest level of new cases since 2017. The Third and Ninth Circuits continue to be high-activity jurisdictions for SCA cases, with 25 and 79 cases filed in 2020 in these circuits, respectively. While the number of cases filed in the Second and Third Circuits declined, the Ninth Circuit observed a 41% increase in filings. Taken together, these trends resulted in the Ninth Circuit accounting for the highest proportion of new filings for the first time in the last five years. Combined, the Second, Third, and Ninth Circuits continue to account for a significant proportion of new cases filed, increasing slightly to 79% of all the new non-merger-objection cases filed in 2020. See Figure 4.

Figure 4. **Federal Filings by Circuit and Year**
Excludes Merger Objections
January 2016–December 2020

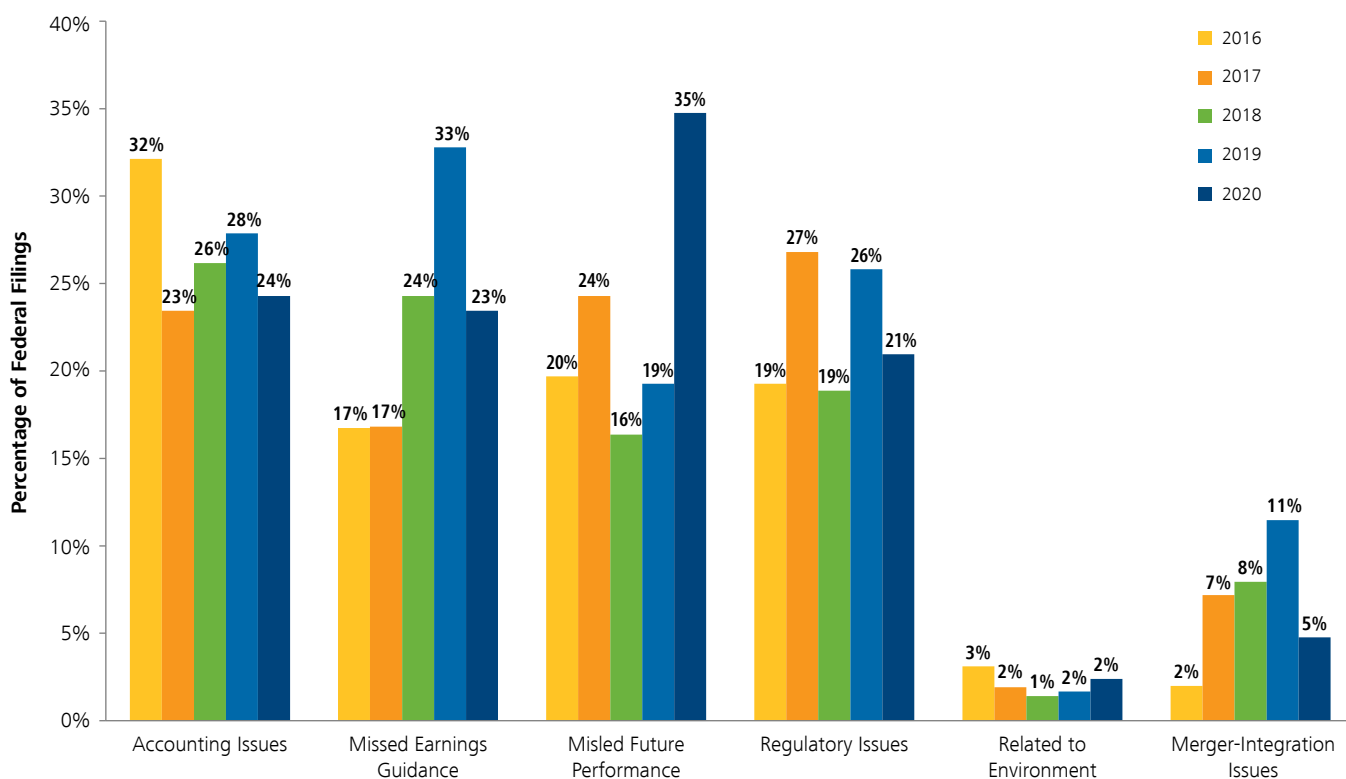


Allegations

Over the past three years, there has been year-to-year variation in the most frequently occurring allegation in shareholder class action suits filed.⁵ In 2018, the most common allegation included in complaints was related to accounting issues, with 26% of cases including such a claim. This pattern is consistent with the distributions observed in recent years; claims related to accounting issues remain one of the most common and frequent allegations included in complaints. In 2019, we observed a spike in cases involving allegations of missed earnings guidance, with over 30% of cases involving a related claim. However, the proportion of cases alleging claims related to missed earnings guidance decreased to 23% in 2020. For cases filed in 2020, there emerged a new common allegation; 35% of the complaints included a claim related to misled future performance. This is the first time in the last five years that this allegation has been included in more complaints than those alleging accounting issues, missed earnings guidance, or regulatory issues. Although there was an upward trend in the frequency of cases involving allegations related to merger integration issues between 2016 and 2019, this pattern did not continue in 2020, with this category falling to only 5% of cases from 11% in 2019. See Figure 5.

Figure 5. **Allegations**

Shareholder Class Actions with Alleged Violations of Rule 10b-5, Section 11, and/or Section 12
January 2016–December 2020

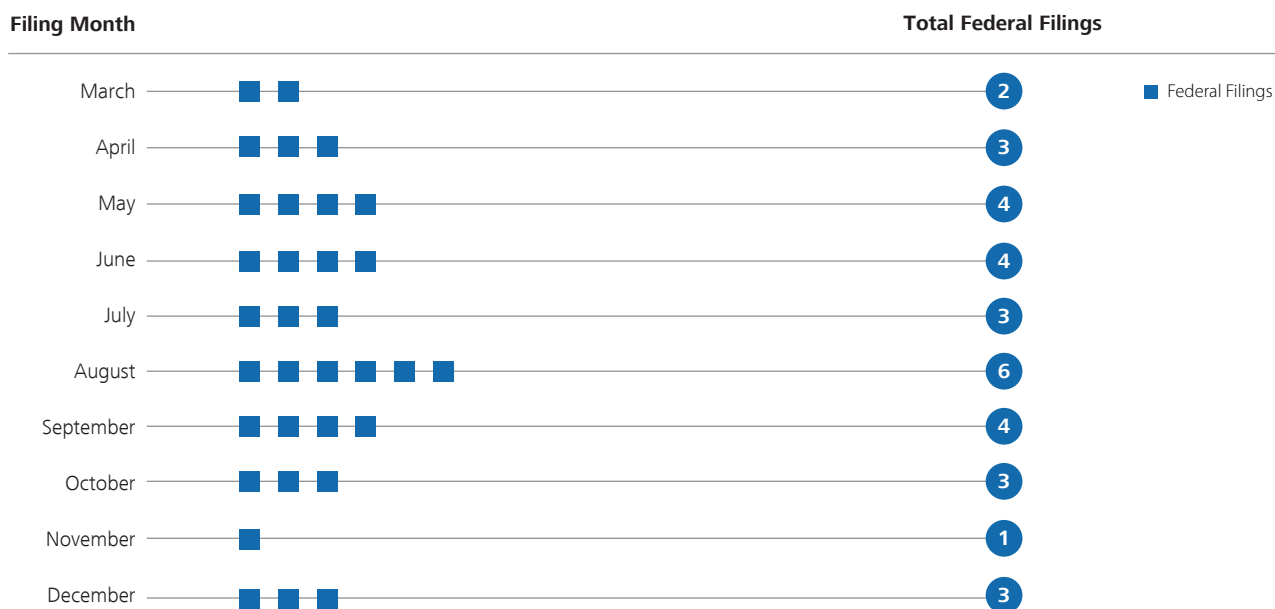


Recent Developments in Federal Filings⁶

COVID-19

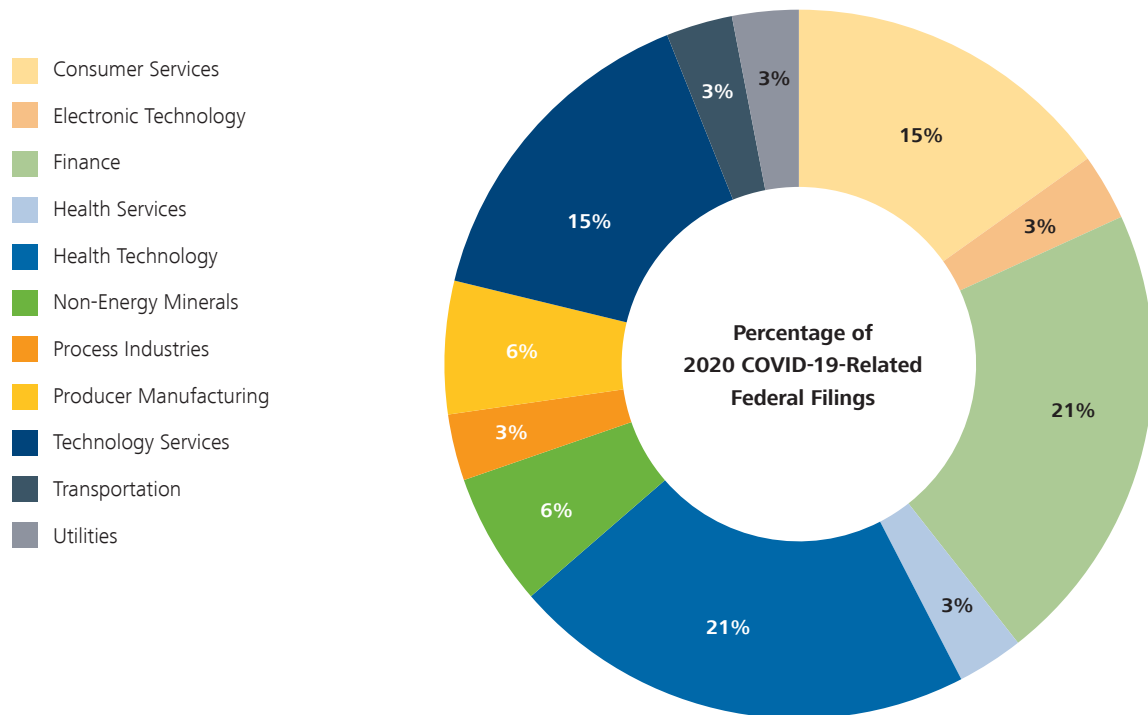
In March of 2020, the COVID-19 pandemic changed the way individuals work, the way they live, and how companies operate. The pandemic's impact on filings has not yet been fully determined and it will likely take time to evaluate if it was the underlying driver of the lower level of cases filed in 2020. On the other hand, the pandemic brought about a new category of event-driven cases, with the first such case filed in March. Since then, there have been 33 cases filed with claims related to COVID-19 included in the complaint. See Figure 6.

Figure 6. **Number of 2020 COVID-19-Related Federal Filings by Month**
March 2020–December 2020

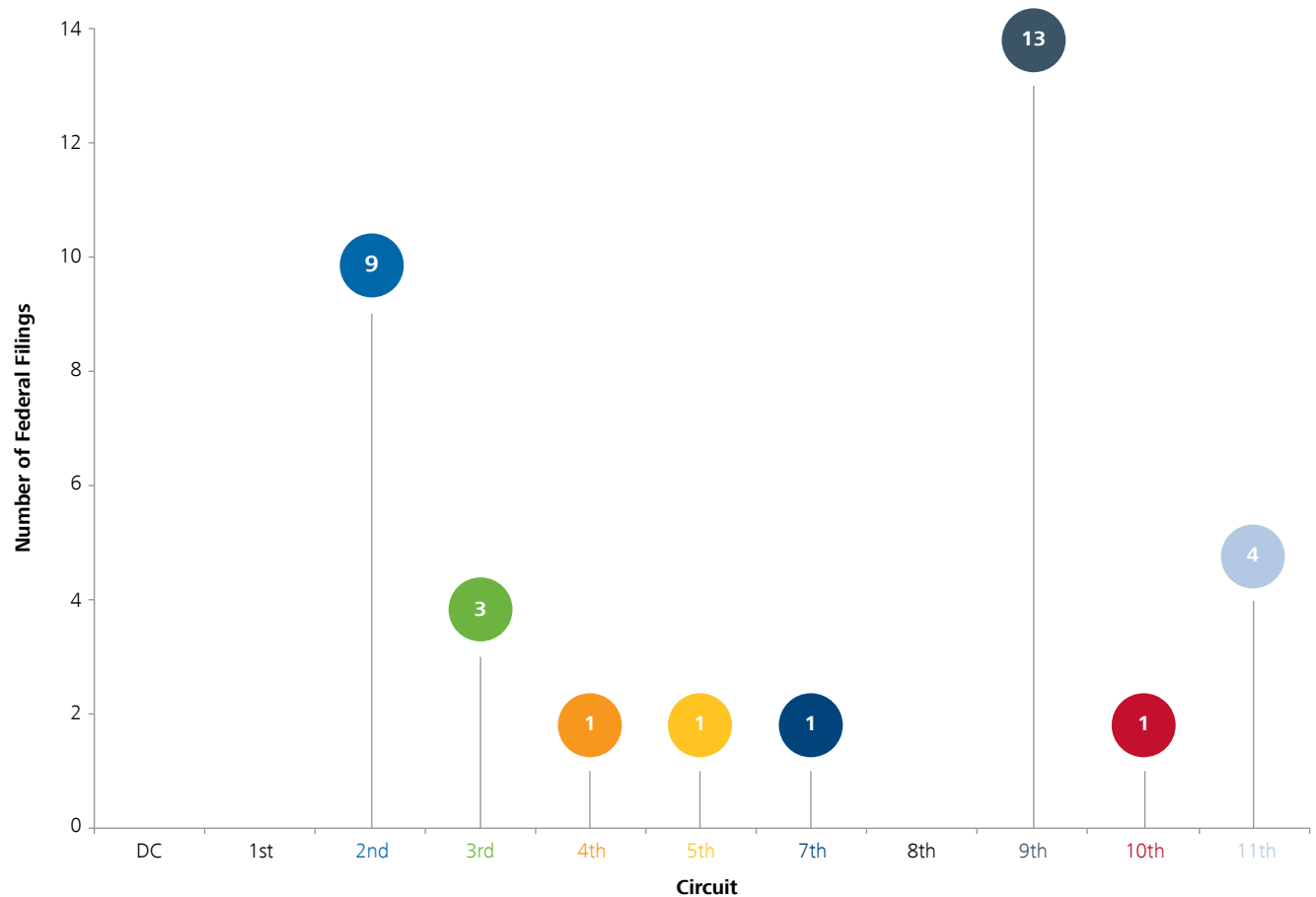


The distribution of these COVID-19-related cases across sectors reveals a pattern similar to the distribution across total cases filed in 2020. The proportion of filings against defendants in the combined health technology and health services sectors was 24%. Approximately 21% of the COVID-19 cases were filed against defendants in the finance sector and the consumer services and technology services sectors each accounted for approximately 15% of cases. See Figure 7.

Figure 7. **Percentage of 2020 COVID-19-Related Federal Filings by Sector**
March 2020–December 2020



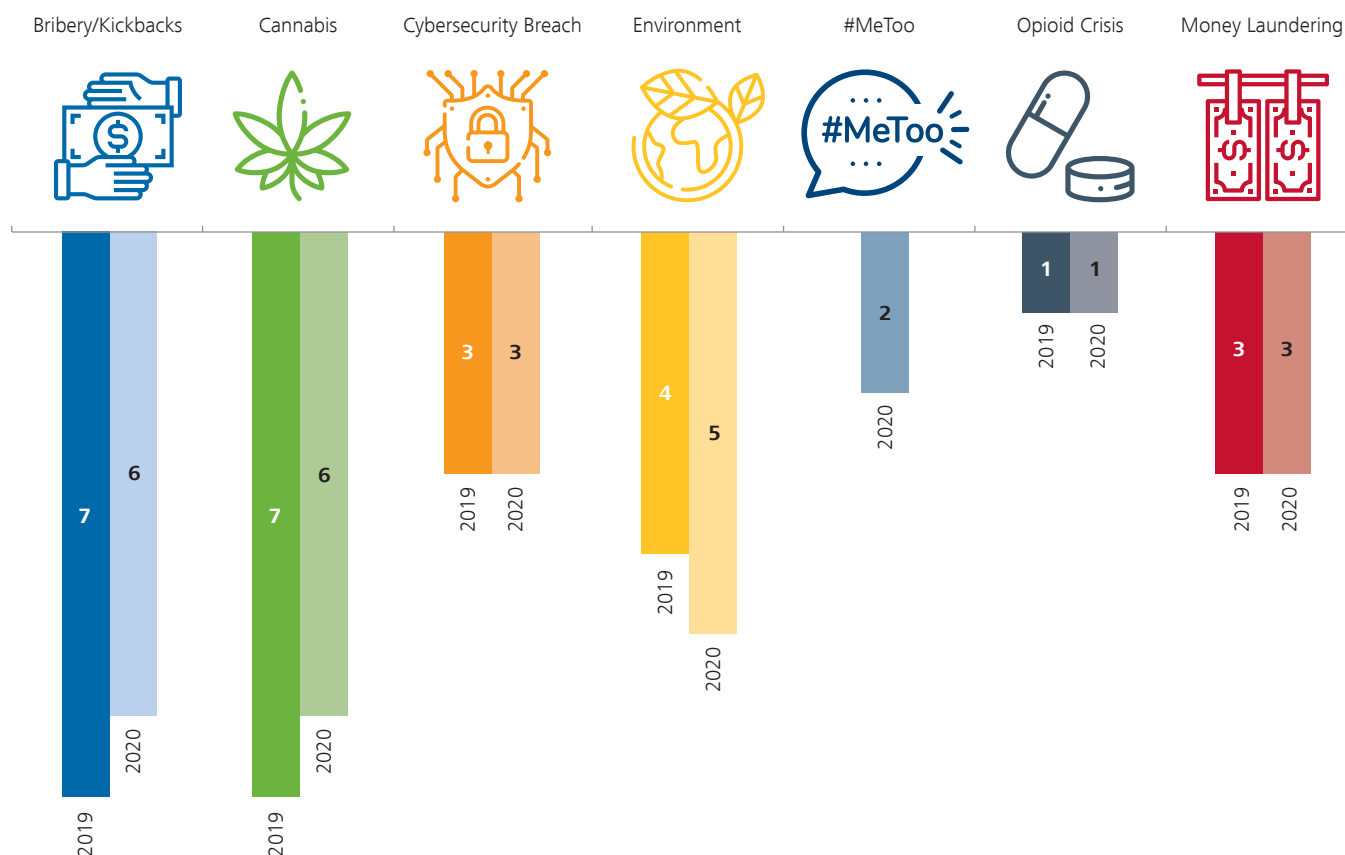
Unlike for the universe of total filings, the top three circuits for most COVID-19 filings were the Ninth, Second, and Eleventh Circuits. Over one-third of the COVID-19-related cases filed were presented in the Ninth Circuit, followed closely by the Second Circuit. See Figure 8.

Figure 8. **Number of 2020 COVID-19-Related Federal Filings by Circuit**

The claims alleged in the complaints for these COVID-19-related filings varied. For example, within the NERA database, we identified three cases filed against defendants in the cruise line industry—namely, Norwegian Cruise Line Holdings, Carnival Corporation, and Royal Caribbean Cruises. The complaint filed against Norwegian Cruise Line Holdings alleges the company made false and/or misleading statements and/or failed to disclose that it was providing customers with false statements about COVID-19 to entice them to purchase cruises. The Carnival Corporation lawsuit alleged that the company’s misstatements concealed the increasing presence of COVID-19 on the company’s ships. In the complaint against Royal Caribbean Cruises, plaintiffs allege there was a failure to disclose material facts related to the company’s decrease in bookings outside of China.

In addition to tracking COVID-19-related filings, we have also monitored federal securities class action filings in a number of recent development areas. See Figure 9 for a summary of filings in these areas for 2019 and 2020.

Figure 9. **Event-Driven and Other Special Cases by Filing Year**
January 2019–December 2020



Bribery/Kickbacks

Securities class action suits related to claims of bribery have remained fairly stable over the 2019–2020 period, with six such cases filed in 2019 and five filed in 2020. Of the 11 cases filed in the last two years, all remain pending as of December 2020. These cases span a range of sectors, with the electronic technology and technology services sector accounting for the highest proportion. In addition, cases filed with claims related to kickbacks are still being brought to the courts, with one case filed in both 2019 and 2020. Both of these cases include claims related to regulatory issues.

Cannabis

In last year's report, we identified filings against companies in the cannabis industry as a development area. In 2020, filings within this industry have continued with six new cases. The allegations included in these recent complaints were related to accounting issues, misled future performance, and missed earnings guidance. The majority of cases continue to be presented in the Second Circuit and all defendants but one are in the process industries sector.

Cybersecurity Breach Cases

In 2020, like 2019, there were three new filings related to a cybersecurity breach. The Ninth Circuit continues to be a common venue for these cases. Among the six cases filed between 2019 and 2020, four have included allegations related to missed earnings guidance or misleading future performance, with only one case alleging regulatory issues.

Environment-Related

Similar to bribery-related cases, filings pertaining to environment-related claims have continued to be presented at a steady pace, with five cases filed in 2020 and four cases filed in 2019. Four of the nine cases recently filed include allegations related to regulatory issues and five were filed in the Second and Ninth Circuits.

#MeToo

Following the surge of #MeToo cases filed in 2018, only two such cases have been filed in the last year. Both cases were filed in the second half of 2020.

Opioid Crisis

Only two cases related to the opioid crisis have been filed since 2018, both of which were filed in the Third Circuit and include allegations related to accounting and regulatory issues.

Money Laundering

Cases with claims of money laundering also continue to be filed, with three such cases filed in both 2019 and 2020. All six of these cases included an allegation related to regulatory issues.

Trend in Resolutions

Number of Cases Settled or Dismissed

Following a decline in the total number of cases resolved in 2019, resolutions rose in 2020, returning to a level relatively in line with 2017 and 2018. In 2020, 247 cases were resolved in favor of the defendant and 73 cases were settled, for a total of 320 resolutions for the year. This represents an increase of approximately 4% in resolved suits over the 309 cases resolved in 2019.

Despite the aggregate increase in resolutions, the trend observed in dismissals and settlements differed. While there was a decline of 25% in the number of settled cases, there was an increase in the number of dismissed cases.⁷ The number of cases settled in 2020 is the lowest recorded number of settled cases in the most recent 10-year period and is more than 40% lower than the average number of settled cases (122) observed between 2016 and 2018. At this time, there is insufficient evidence to determine whether this lower number of settlements is connected to COVID-19-related factors. The increase in the number of dismissed cases was sufficient to not only offset the decrease in settlements but also to increase the overall number of resolved cases. The number of cases dismissed in 2020 also set a new 10-year record with approximately 6% more cases dismissed than in 2018, the second highest year in the period.

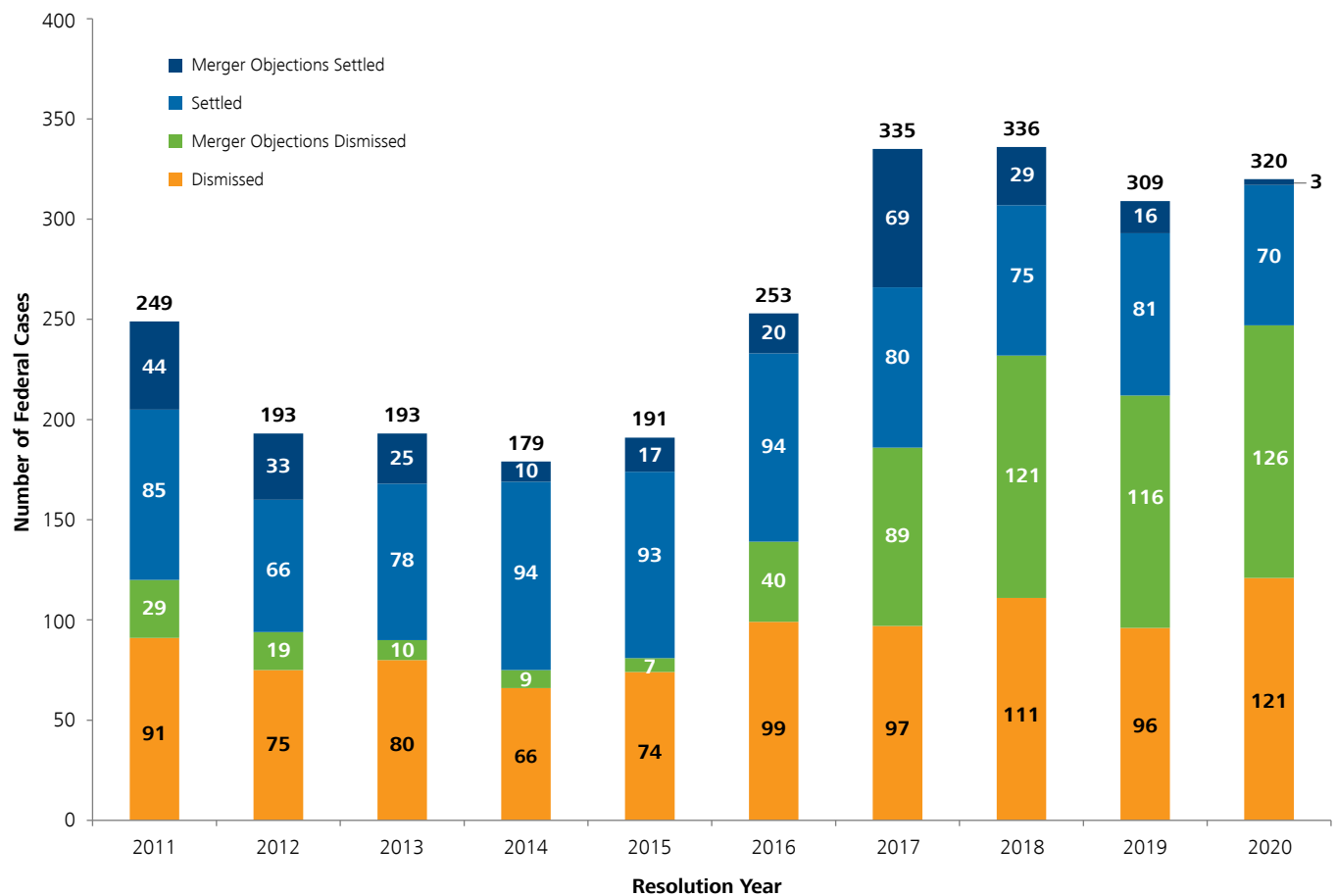
Starting in 2015, there has been a gradual decline in the proportion of cases that were closed due to settling. Of the cases resolved in 2014, 58% were settled. In each subsequent year, this proportion has declined, falling to 44% for cases resolved in 2017. For cases resolved in 2020, the

proportion of resolved cases that were settled is the lowest in recent history, with less than 25% of the cases settling. It is not surprising the proportion declined to a new low given the decrease in the number of cases settled combined with the increase in dismissals that occurred in 2020. See Figure 10.

Although 2020 was a record-setting low year for total settled cases, the magnitude of the decrease in settled cases differed for standard cases and merger-objection cases. Settled non-merger-objection cases decreased by less than 15%, falling to 70 cases, though still within the historical 10-year range. On the other hand, settled merger-objection cases declined by more than 80% to merely three cases, which is substantially lower than the number of such cases settled in any single year in the last 10 years.

There was a 26% increase in dismissals of standard cases and a 9% increase in dismissals of merger-objection cases. For non-merger-objection and for merger-objection cases, the increase in dismissals was enough to establish 2020 as the year with the highest number of dismissals within each category in recent years.

Figure 10. **Number of Resolved Cases: Dismissed or Settled**
January 2011–December 2020

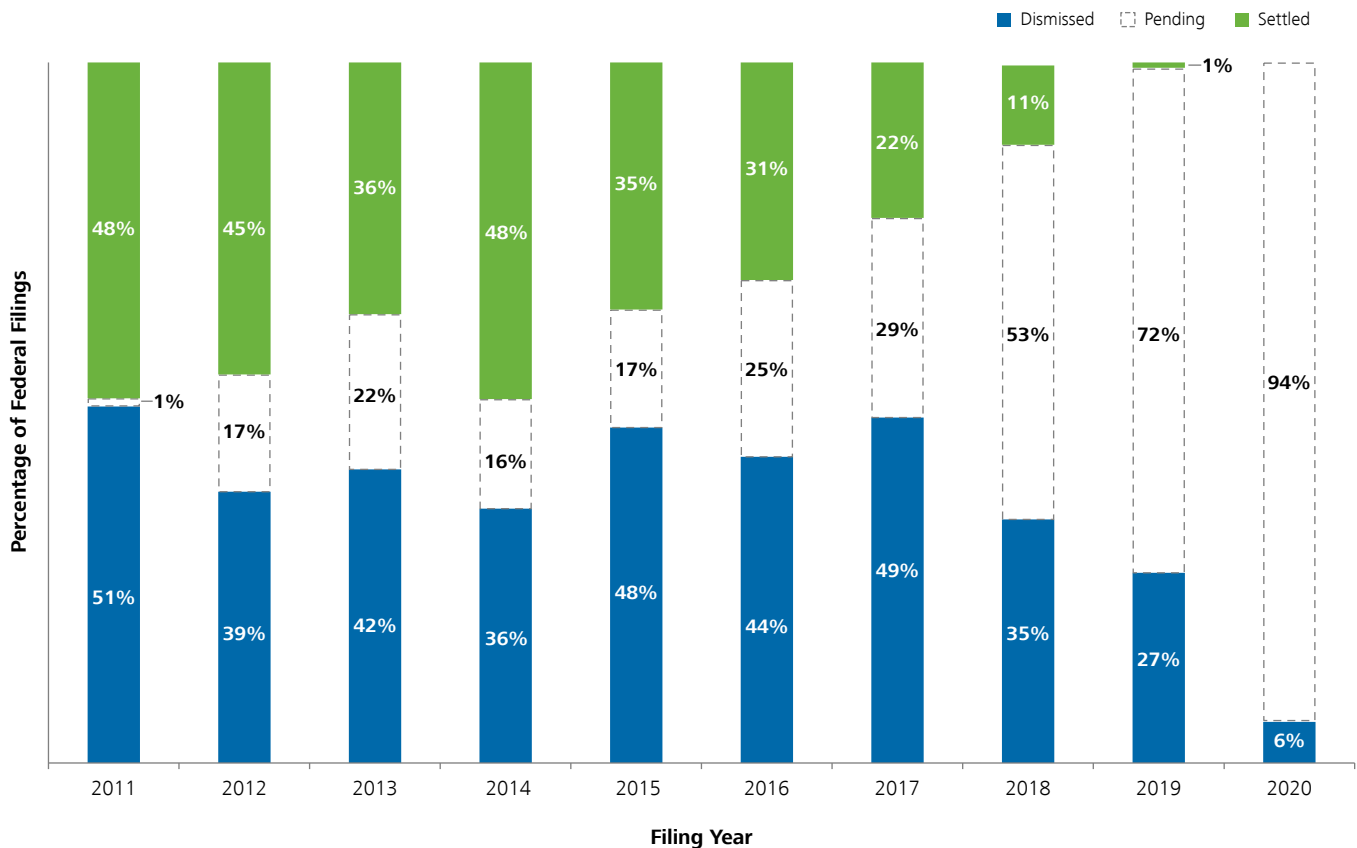


Case Status by Filing Year

A review of the current status of securities class action suits filed after 2014 reveals that within each filing year a greater proportion of cases have been dismissed than have been settled. For cases filed between 2015 and 2017, dismissal rates range from 44% to 49% each year while settlement rates range from 22% to 35%. The difference in current case outcome is even more stark for cases filed in 2018 and 2019. Of the cases filed in 2018, as of December 2020, 35% were resolved in favor of the defendant, 11% were settled, and 53% remained pending. For cases filed in 2019, only 1% were resolved for positive payment, while 27% were dismissed, and 72% were still unresolved. However, the current resolution distribution of cases may not necessarily be an indication of the final outcome for all resolved cases as historical evidence indicates that a larger proportion of the pending cases will result in a positive settlement because settlements typically occur in the latter phases of litigation, whereas motions for summary judgment or dismissal typically occur in the earlier stages. See Figure 11.

Figure 11. **Status of Cases as Percentage of Federal Filings by Filing Year**

Excludes Merger Objections and Verdicts
January 2011–December 2020

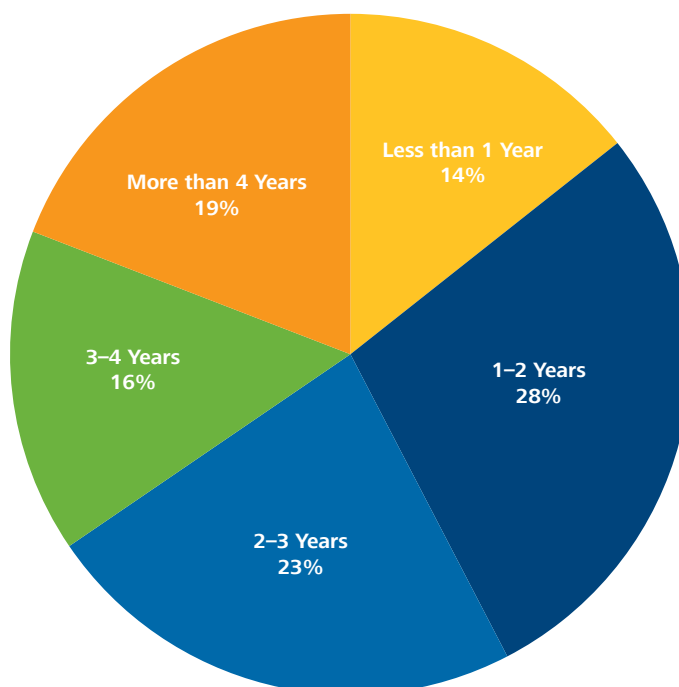


Note: Dismissals may include dismissals without prejudice and dismissals under appeal.

Time From First Complaint Filing to Resolution

A review of the cases filed between 1 January 2002 and 31 December 2016 reveals that a significant proportion of cases are resolved in under four years.⁸ Looking at the time from the filing of the first complaint through the resolution of the case, whether a dismissal or a settlement, shows that more than 80% of suits are resolved within four years, and 65% within the first three years. The most common resolution periods in the data are between one and two years (28% of cases) and between two and three years (23% of cases). Within the first year of filing, 14% of cases are resolved. See Figure 12.

Figure 12. **Time from First Complaint Filing to Resolution**
Cases Filed January 2002–December 2020 and Resolved January 2002–December 2020



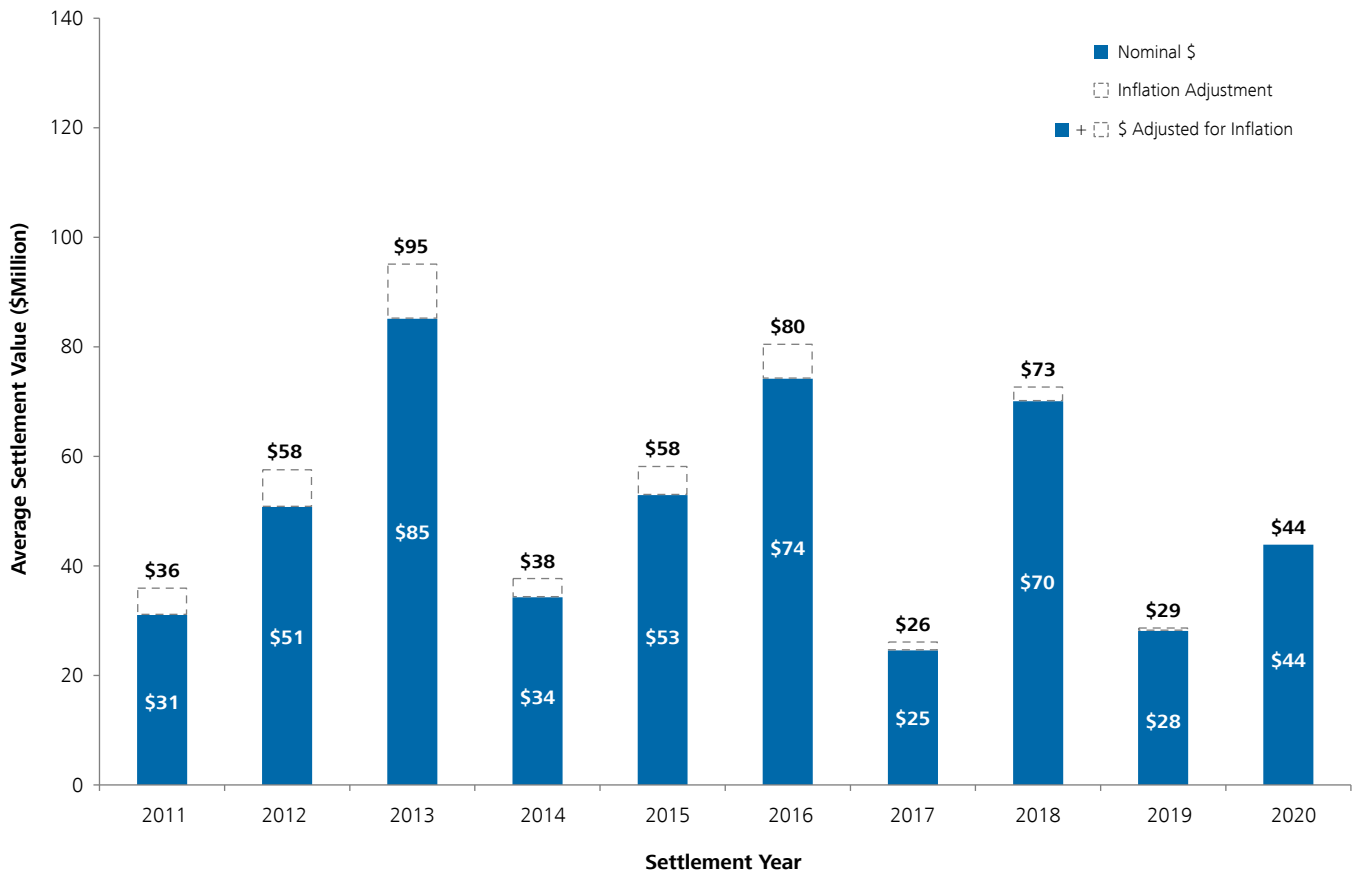
Trend in Settlement Values

Average and Median Settlement Value

To analyze recent trends in settlement values, we calculate and evaluate settlements using multiple alternative measures.⁹ First, we evaluate trends by reviewing the annual average settlement value for non-merger-objection cases with positive settlement values. Given that these average settlement values may be impacted by a few high “outlier” settlements, we also review the median settlement value and average settlement for cases under \$1 billion, again on an annual basis.

The average settlement value in 2020 was \$44 million for non-merger objection cases with settlements of more than \$0 to the class. This is a more than 50% increase over the 2019 inflation-adjusted average of \$29 million but still below the 2018 inflation-adjusted average of \$73 million. Historically, the average settlement value has shown year-to-year variation partly due to the presence or absence of one or two “outlier” settlements. Between 2011 and 2020, the annual inflation-adjusted average settlement value has ranged from a low of \$26 million in 2017 to a high of \$95 million in 2013. As such, the 2020 average is well within the range observed within the last 10 years. See Figure 13.

Figure 13. **Average Settlement Value**
Excludes Merger Objections and Settlements for \$0 to the Class
January 2011–December 2020

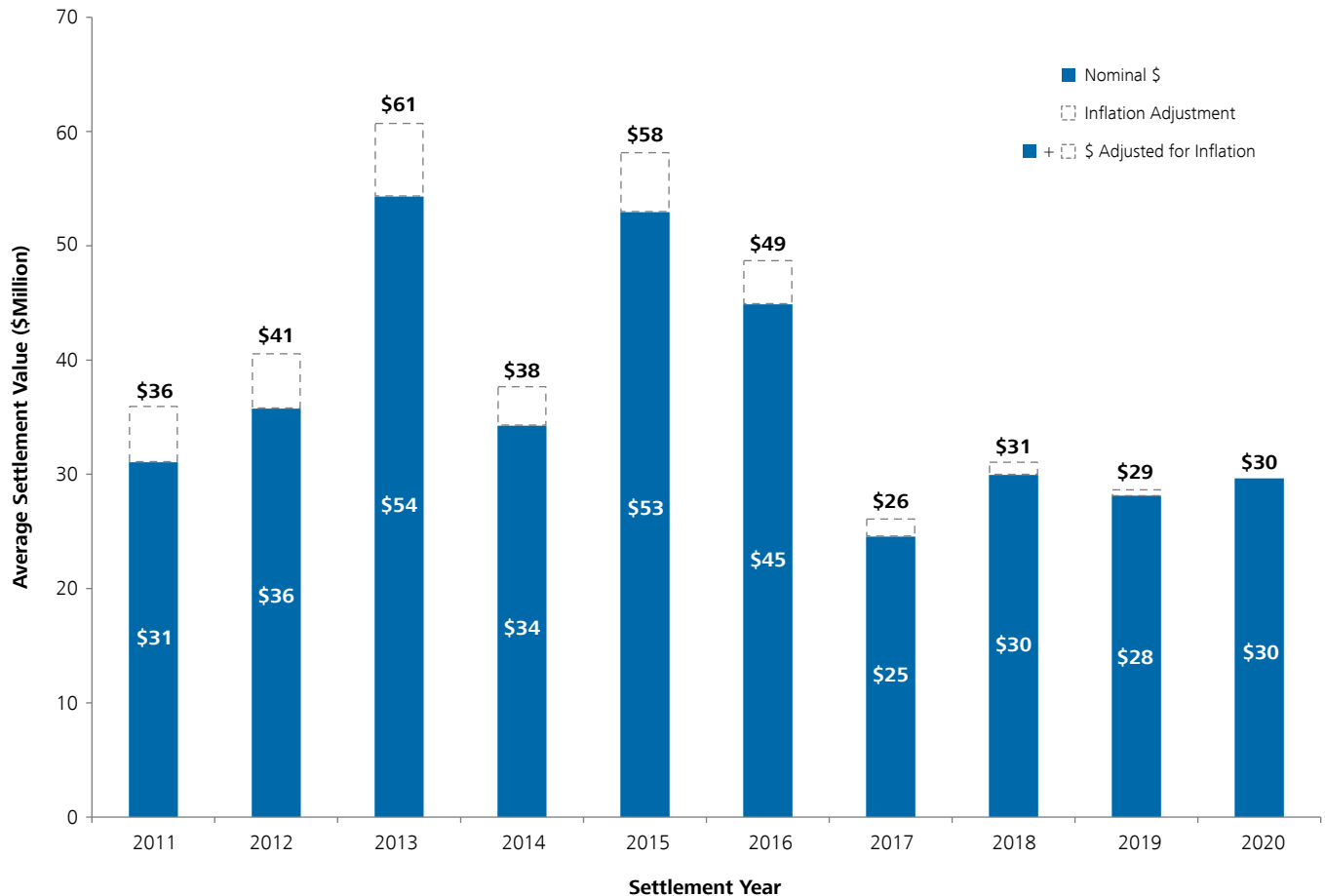


The second measure of trends in settlement values evaluated is the annual average settlement excluding merger objections, settlements for \$0 to the class, and individual cases with settlements of \$1 billion or greater. Given the infrequency of cases with settlements of \$1 billion or greater and the impact these “outlier” settlements can have on the annual averages, this second measure seeks to evaluate the general trend in settlements absent these cases. For example, for 2020 settlements, this measure evaluates the settlement values excluding the American Realty Capital Properties

settlement of \$1.025 billion. Figure 14 illustrates that once these cases are removed, the annual average settlement values have been stable in recent years, ranging from \$26 million to \$31 million within the last four years. Though the 2020 average settlement value of \$30 million is 3% higher than the 2019 average, it is still substantially lower than the average values for cases settled for under \$1 billion in 2015 and 2016, which are \$58 million and \$49 million respectively.

Figure 14. **Average Settlement Value**

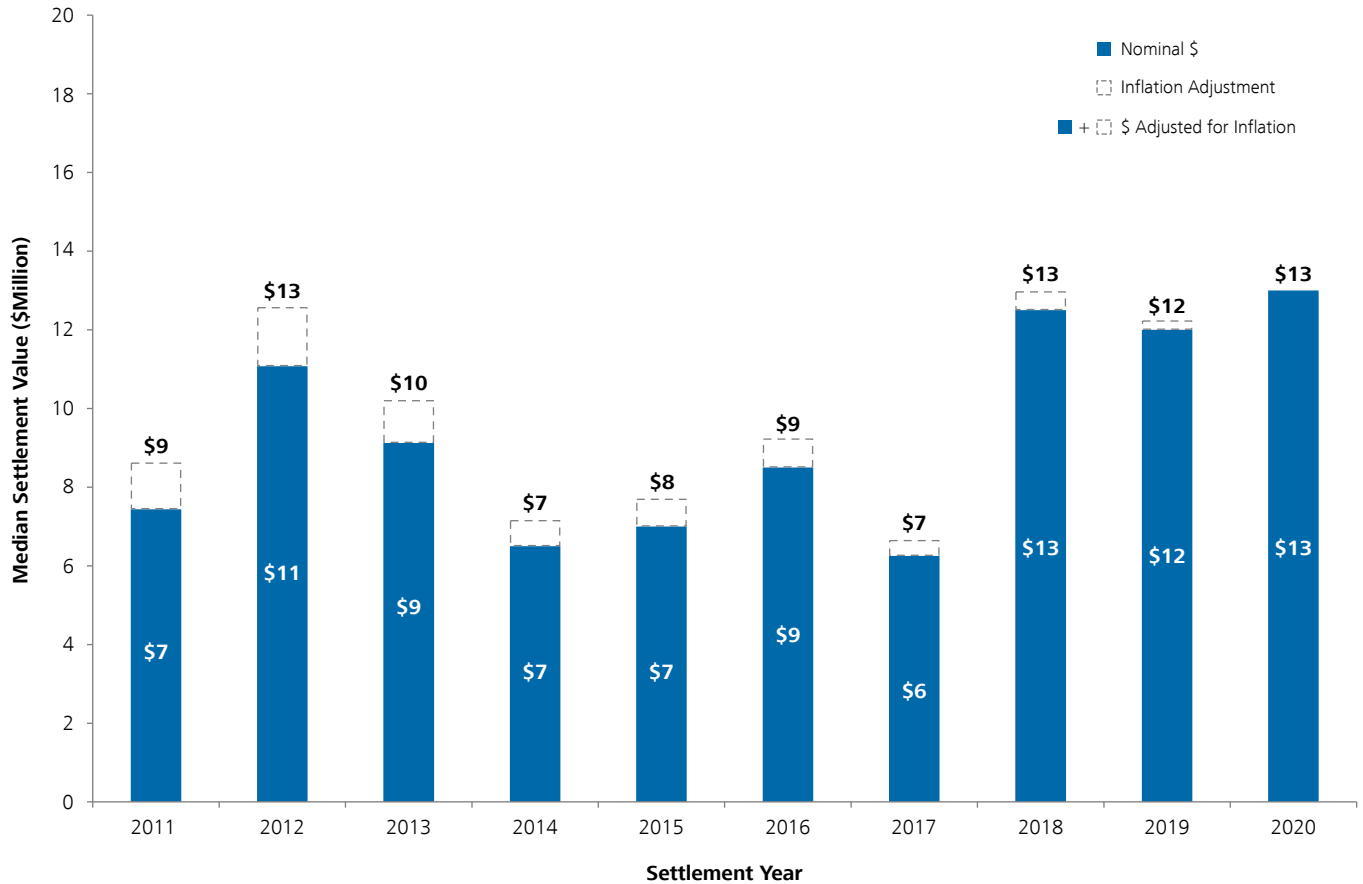
Excludes Settlements over \$1 Billion, Merger Objections, and Settlements for \$0 to the Class
January 2011–December 2020



The median annual settlement value for 2020 was \$13 million, the highest recorded median value in the last 10 years (the median settlement value for cases settled in 2018 was also \$13 million). Though the median settlement value for 2020 is less than 10% higher than the inflation-adjusted median in 2019, the 2020 value is nearly twice the inflation-adjusted median settlement value for cases settled in 2017. The general increasing trend in annual median settlement values indicates an upward shift in individual settlement values. In other words, a higher proportion of cases has settled for higher values in the last three years when compared to settlements that occurred in 2017 or before. See Figure 15.

Figure 15. **Median Settlement Value**

Excludes Settlements over \$1 Billion, Merger Objections, and Settlements for \$0 to the Class
January 2011–December 2020



An evaluation of the change in the distribution of settlement values over the past five years further supports this notion. There has been a downward trend in the proportion of cases with individual settlements less than \$10 million and a corresponding increase in the proportion of cases found in the higher settlement ranges. More specifically, in 2017, 61% of cases resolving for positive payment had settlement values of less than \$10 million compared to 44% of 2020 cases settled within this category. Similarly, 24% of 2017 settled cases had settlement values between \$10 million and \$50 million while 40% of the 2020 settled cases had individual settlements within this range. This pattern of a greater proportion of settled cases within the \$10–\$50 million range in the last three years aligns with the higher annual median settlement values observed in these years.

Top Settlements for 2020

Table 1 summarizes the 10 largest securities class action settlements in 2020. Between 1 January 2020 and 31 December 2020, there was one “mega” settlement—an individual case with a settlement for \$1 billion or greater—for a suit against American Realty Capital Properties. This case involved allegations related to accounting issues, including claims that the defendants made materially false and misleading statements. All 10 of the top settlements were reached between January and July of 2020 and accounted for 75% of the total settlements reached in 2020.

The economic sectors of defendants associated with the top 10 settlements varied, with the commercial services and utilities sectors having the highest frequency, with two cases in each category. Eight of the top 10 settlements were cases filed in the Second, Ninth, and Eleventh Circuits. The average and most frequent length of time between first complaint filing and settlement for the top 10 settlements in 2020 was five years and three years, respectively.

Table 1. **Top 10 2020 Securities Class Action Settlements**

Rank	Defendant	Filing Date	Settlement Date	Total Settlement Value (\$Million)	Plaintiffs’ Attorneys’ Fees and Expenses (\$Million)	Circuit	Economic Sector
1	American Realty Capital Properties Inc.*	30 Oct 14	22 Jan 20	\$1,025.0	\$105.2	2nd	Finance
2	First Solar, Inc.	15 Mar 12	30 Jun 20	\$350.0	\$72.5	9th	Electronic Technology
3	Signet Jewelers Limited	25 Aug 16	21 Jul 20	\$240.0	\$63.1	2nd	Retail Trade
4	SCANA Corporation	27 Sep 17	17 Jun 20	\$192.5	\$28.2	4th	Utilities
5	Equifax Inc.	8 Sep 17	26 Jun 20	\$149.0	\$30.8	11th	Consumer Services
6	SunEdison, Inc.	4 Apr 16	25 Feb 20	\$139.6	\$29.7	2nd	Utilities
7	SeaWorld Entertainment, Inc.	9 Sep 14	22 Jul 20	\$65.0	\$16.4	9th	Consumer Services
8	Community Health Systems, Inc.	9 May 11	19 Jun 20	\$53.0	\$6.3	6th	Health Services
9	HD Supply Holdings, Inc.	10 Jul 17	21 Jul 20	\$50.0	\$15.3	11th	Distribution Services
10	FleetCor Technologies, Inc.	14 Jun 17	14 Apr 20	\$50.0	\$13.0	11th	Commercial Services
Total				\$2,314.1	\$380.4		

*Note: Now called VEREIT, Inc.

Despite the presence of one “mega” settlement for \$1.025 billion in 2020, the top 10 settlements since the passage of PLSRA remains unchanged. This list last changed in 2018 due to the Petrobras settlement of \$3 billion and includes settlements ranging from \$1.1 billion to \$7.2 billion. See Table 2.

Unlike the 2020 top 10 settlements, the all-time top 10 settlements are more concentrated in specific circuits, with six of the 10 cases in the Second Circuit. The most common economic sector of defendants associated with the top settlements was finance. While there are a few common economic sectors in the top 2020 and all-time lists, some of the economic sectors represented in the 2020 top 10 list are not included in the all-time list, such as utilities and commercial services.

Table 2. **Top 10 Federal Securities Class Action Settlements**

As of 31 December 2020

Rank	Defendant	Filing Date	Settlement Year(s)	Codefendant Settlements				Circuit	Economic Sector
				Total Settlement Value (\$Million)	Financial Institutions Value (\$Million)	Accounting Firm Value (\$Million)	Plaintiffs' Attorneys' Fees and Expenses (\$Million)		
1	ENRON Corp.	22 Oct 01	2003–2010	\$7,242	\$6,903	\$73	\$798	5th	Industrial Services
2	WorldCom, Inc.	30 Apr 02	2004–2005	\$6,196	\$6,004	\$103	\$530	2nd	Communications
3	Cendant Corp.	16 Apr 98	2000	\$3,692	\$342	\$467	\$324	3rd	Finance
4	Tyco International, Ltd.	23 Aug 02	2007	\$3,200	No codefendant	\$225	\$493	1st	Producer Mfg.
5	Petroleo Brasileiro S.A. - Petrobras	8 Dec 14	2018	\$3,000	\$0	\$50	\$205	2nd	Energy Minerals
6	AOL Time Warner Inc.	18 Jul 02	2006	\$2,650	No codefendant	\$100	\$151	2nd	Consumer Services
7	Bank of America Corp.	21 Jan 09	2013	\$2,425	No codefendant	No codefendant	\$177	2nd	Finance
8	Household International, Inc.	19 Aug 02	2006–2016	\$1,577	Dismissed	Dismissed	\$427	7th	Finance
9	Nortel Networks	2 Mar 01	2006	\$1,143	No codefendant	\$0	\$94	2nd	Electronic Technology
10	Royal Ahold, NV	25 Feb 03	2006	\$1,100	\$0	\$0	\$170	2nd	Retail Trade
Total				\$32,224	\$13,249	\$1,017	\$3,368		

NERA-Defined Investor Losses

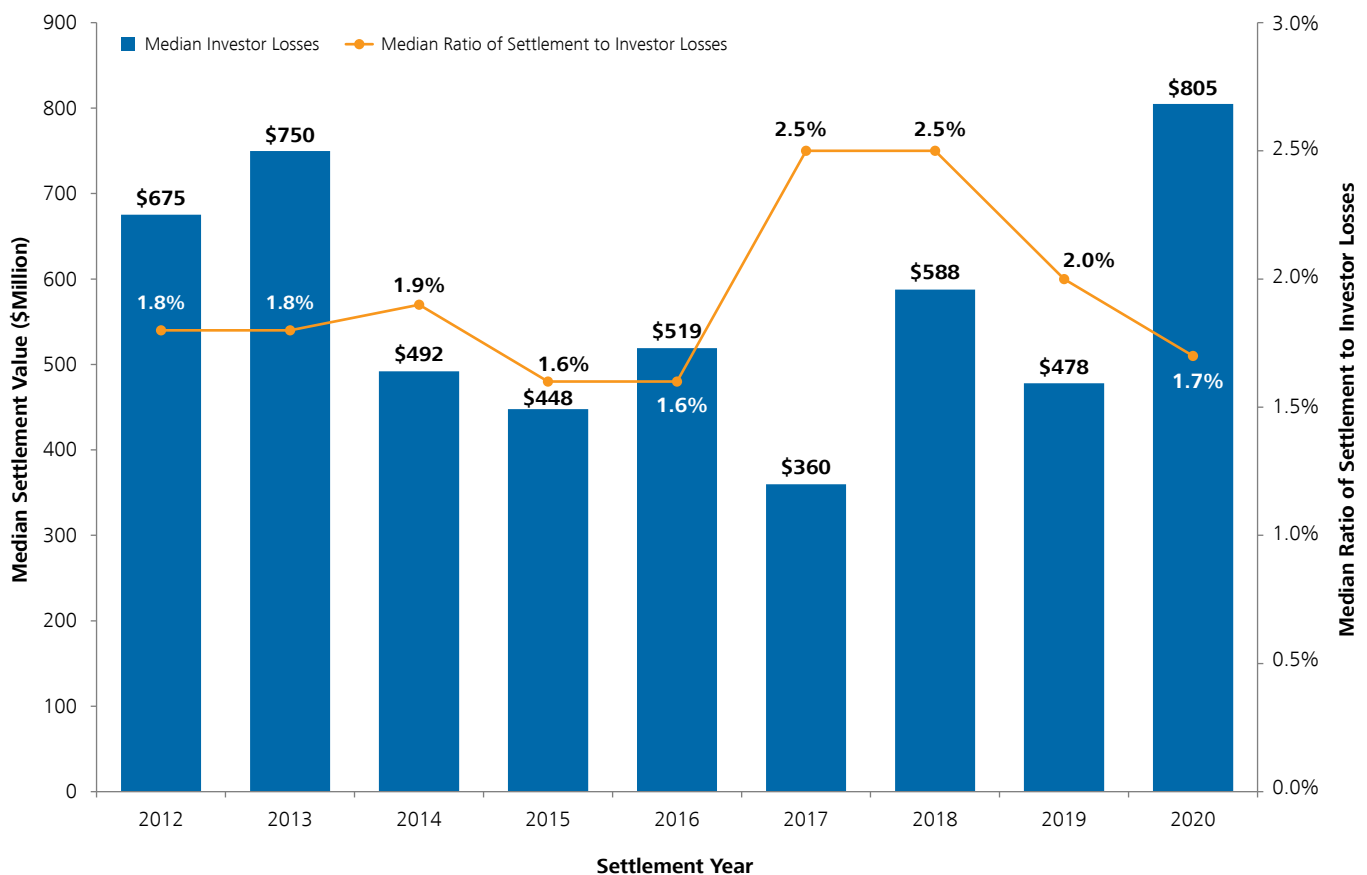
As a proxy to measure the aggregate loss to investors from the purchase of a defendant's stock during the alleged class period, NERA relies on its own proprietary variable, NERA-Defined Investor Losses.¹⁰ This measure of the aggregate amount lost by investors is estimated using publicly available data and is calculated assuming an investor had alternatively purchased stocks that performed similarly to the S&P 500 index during the class period. NERA has reviewed and examined more than 1,000 settlements and found that this proprietary variable is the most powerful predictor of settlement amount. Although losses are highly correlated with settlement values, we have found that settlements do not increase one for one with losses but rather at a slower rate.

For cases settled between 2012 and 2020, the ratio of settlement to Investor Losses is higher for cases with lower settlement values than for cases with higher settlement values. In other words, smaller cases (measured based on the computed Investor Losses) commonly settle for a larger fraction of the estimated Investor Losses than larger cases, though the decline is not linear. In fact, the most dramatic decline occurs between cases with Investor Losses of less than \$20 million and cases with Investor Losses of between \$20 million and \$50 million. More specifically, the median ratio of settlement value to NERA-defined Investor Losses was 24.5% for cases with Investor Losses below \$20 million and 5.2% for cases with Investor Losses between \$20 million and \$50 million. For cases with Investor Losses between \$1 billion and \$5 billion, the median ratio was 1.2%, and falls below 1% for cases with Investor Losses of \$5 billion and higher.

Median Investor Losses and Median Ratio of Actual Settlements to Investor Losses

Following a spike in the median Investor Losses in 2013, the median Investor Losses showed only minor year-to-year fluctuations through 2019. In 2020, the median Investor Losses rose dramatically, reaching a record-setting high of \$805 million. This median is nearly 70% higher than the median value for 2019 of \$478 million and 7% higher than the 2013 median value of \$750 million. For all years between 2017 and 2019, the median ratio of settlement to Investor Losses was above 2%, a higher ratio than was observed in any of the prior five years. Despite the increase in settlement values in 2020, the increase in Investor Losses led to a decline in the median ratio of settlement to Investor Losses. For 2020, the median ratio of settlement to Investor Losses was 1.7%, one of the lowest ratios observed in the last nine years. See Figure 16.

Figure 16. **Median NERA-Defined Investor Losses and Median Ratio of Settlement to Investor Losses by Settlement Year**
January 2012–December 2020



Predicted Settlement Model

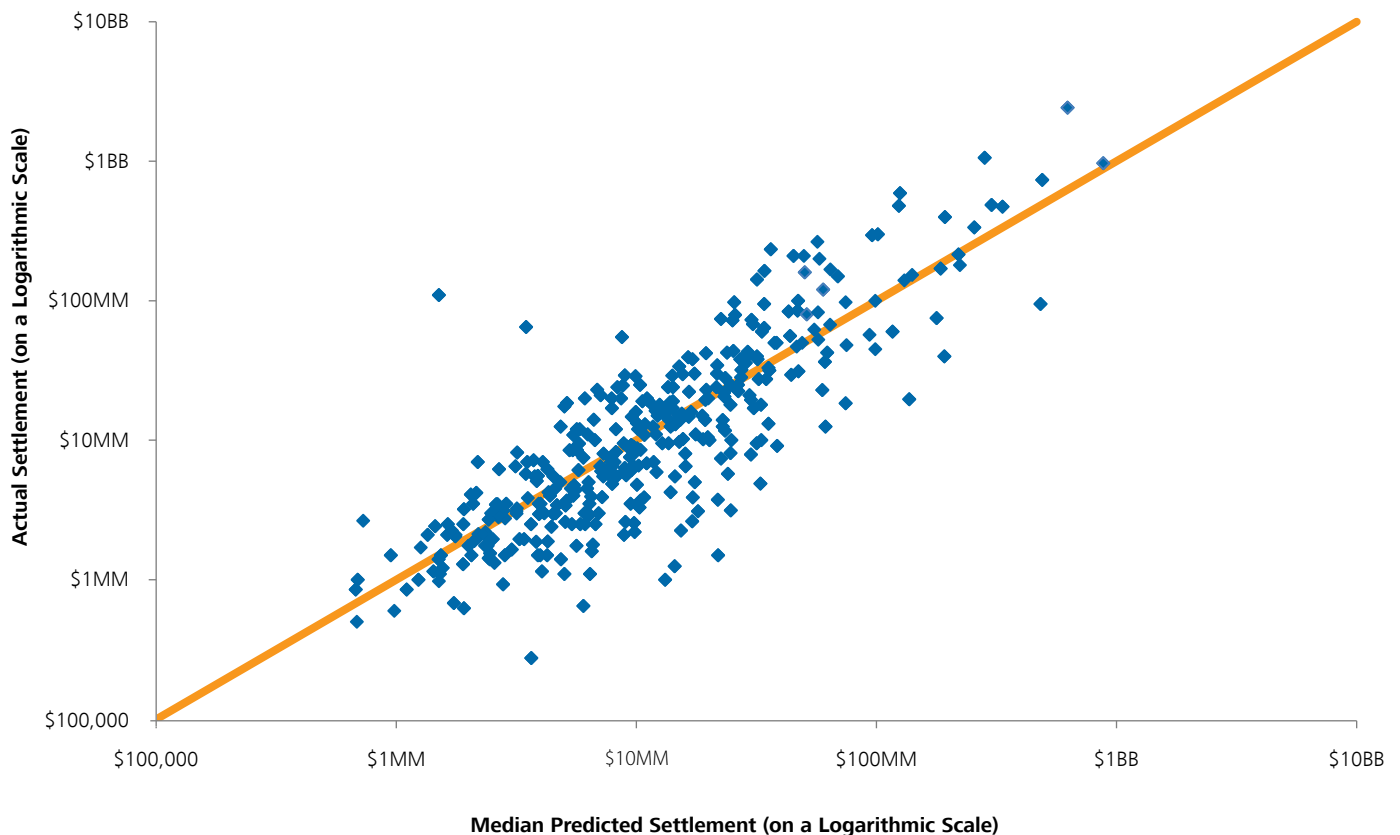
In addition to Investor Losses, NERA identified several other key factors that drive settlement amounts. These factors, when combined with Investor Losses, account for a substantial fraction of the variation observed in actual settlements in our database.

Using the measure of Investor Losses as discussed above in the predicted model, some of the factors that influence settlement values are:

- NERA-Defined Investor Losses (a proxy for the size of the case);
- The market capitalization of the issuer immediately after the end of the class period;
- The types of securities, in addition to common stock, alleged to have been affected by the fraud;
- Variables that serve as a proxy for the merit of plaintiffs' allegations (such as whether the company has already been sanctioned by a governmental or regulatory agency or paid a fine in connection with the allegations);
- The stage of the litigation at the time of settlement; and
- Whether an institution or public pension fund is lead or named plaintiff.

These factors account for a substantial amount of the variation in settlement amounts for the sample of cases in our model with a settlement date between December 2011 and June 2020. In addition, as evidenced in Figure 17, there is significant correlation between the median predicted settlement and actual settlement values for the more than 375 cases in our current model.

Figure 17. **Predicted vs. Actual Settlements**
Investor Losses Using S&P 500 Index



Trends in Plaintiffs' Attorneys' Fees and Expenses

In addition to tracking settlements to plaintiffs, NERA's SCA database also tracks the compensation to plaintiffs' attorneys working on these suits.¹¹ Plaintiffs' attorneys are commonly compensated for their work related to a lawsuit, specifically in fees, as part of a settlement, if one is reached. This compensation is often determined as a fixed percentage of the settlement amount. Additionally, plaintiffs' attorneys also typically receive reimbursement out of the settlement for any out-of-pocket costs incurred in relation to work performed in connection with the case.

Over the 10-year period ending 31 December 2020, the annual aggregate amount of plaintiffs' attorneys' fees and expenses has varied significantly, ranging from a low of \$467 million in 2017 to a high of \$1,552 million in 2016. In 2020, the aggregate plaintiffs' attorneys' fees and expenses was \$613 million, an approximate 6% increase over the 2019 amount but still below the 2018 amount of \$1,202 million. This increase in 2020 was driven by the presence of the American Realty Capital Properties settlement, which accounted for \$105 million of the aggregate fees and expenses for the year. Given that plaintiffs' attorneys' compensation is a function of settlement amount, the presence of "mega" settlements—settlements of \$1 billion or higher—will result in higher aggregate fees and expenses than settlements for lower values. Although there was an increase in 2020 in the aggregate fees and expenses associated with settlements of \$1 billion or higher, there was a decrease in the aggregate fees and expenses related to settlements under \$500 million. The increase in the higher settlement range was sufficient to more than offset the decrease in the lower settlement ranges, resulting in an overall increase in aggregate fees and expenses for settlements in 2020. See Figure 18.

Figure 18. **Aggregate Plaintiffs' Attorneys' Fees and Expenses by Settlement Size**
January 2011–December 2020

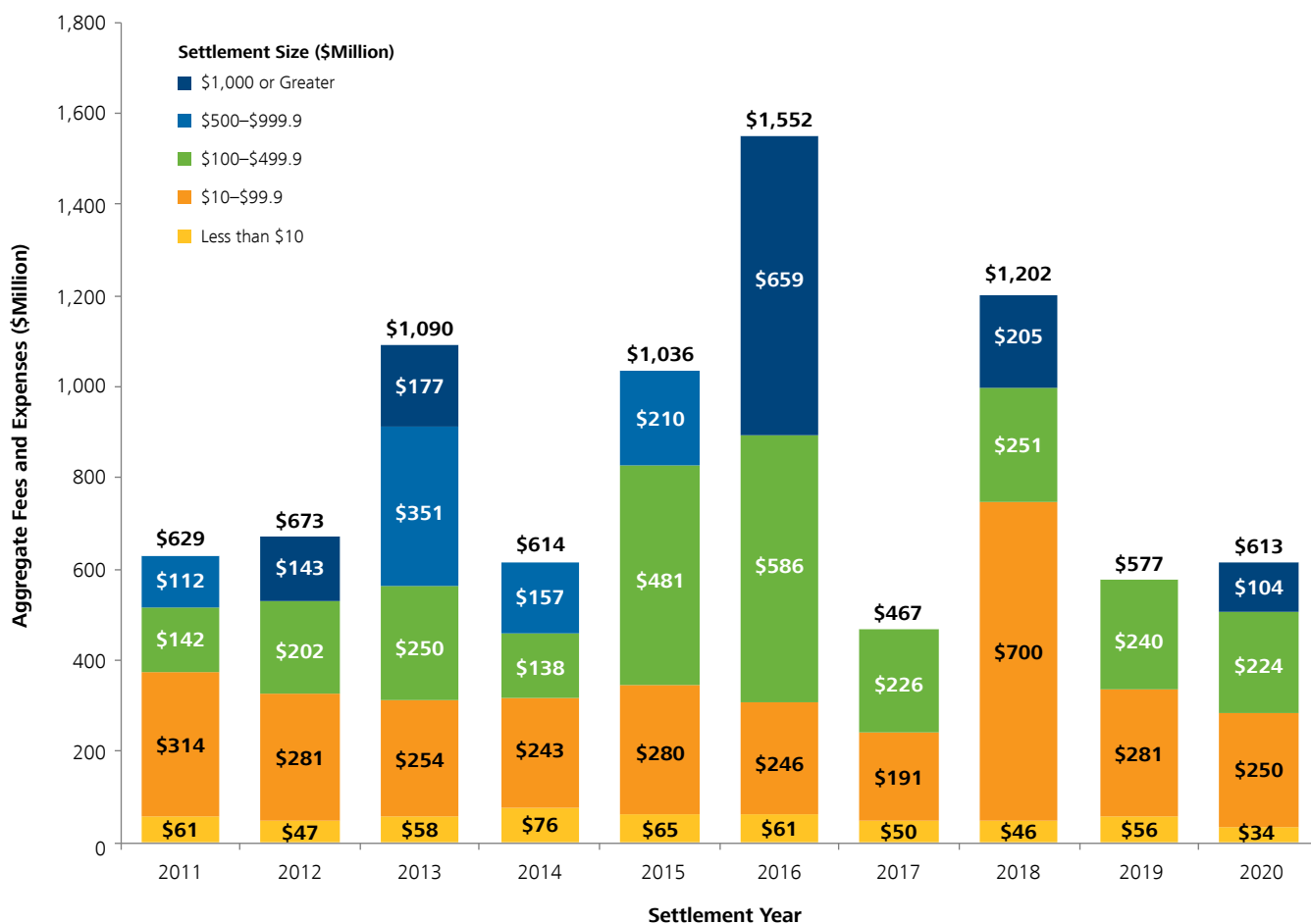
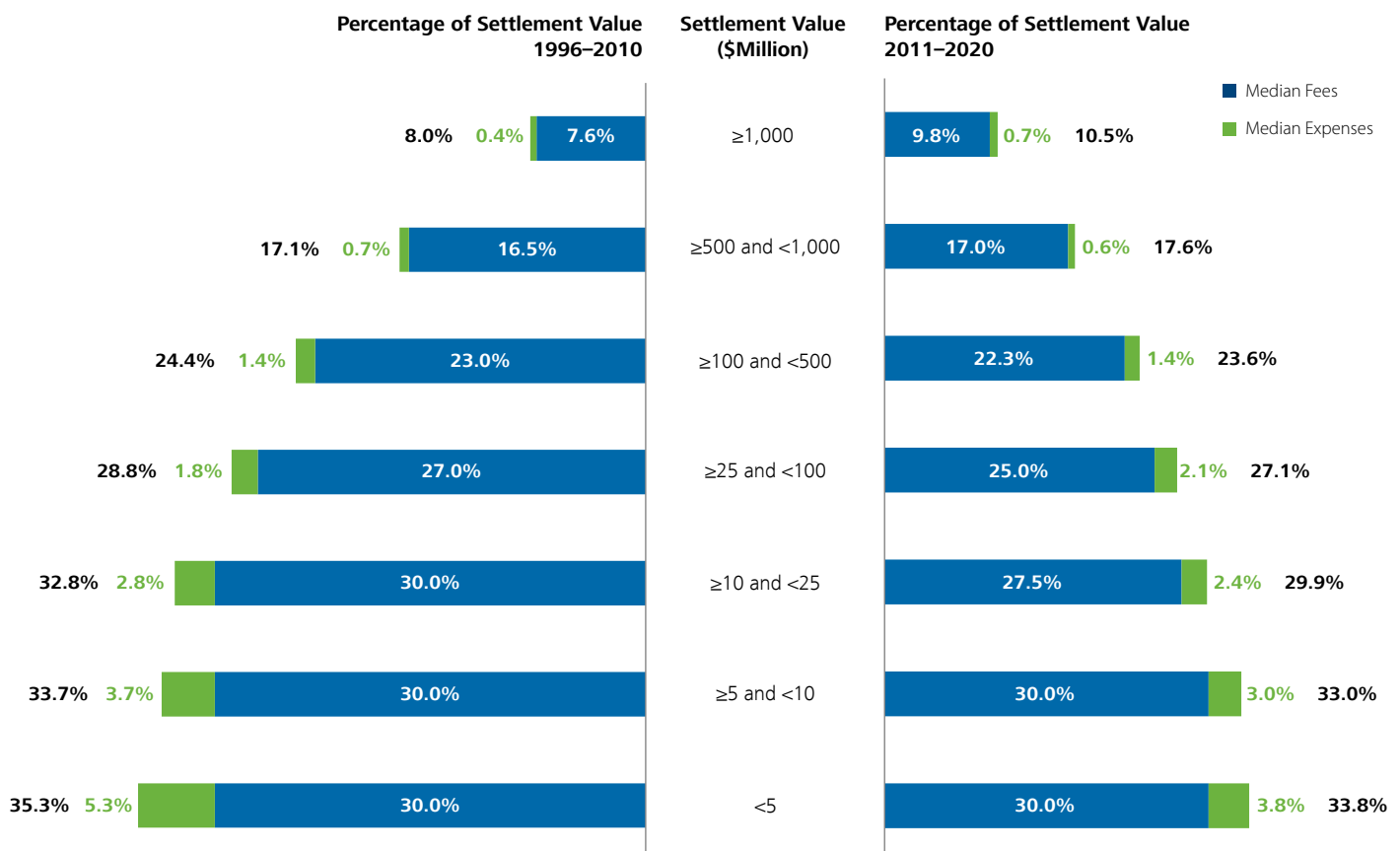


Figure 19 examines the median of plaintiffs' attorneys' fees and expenses as a percentage of settlement value for cases settled between 1996 and 2010 and between 2011 and 2020. As indicated in the chart, plaintiffs' attorneys' fees and expenses represent a declining percentage of settlement value as settlement size increases. This pattern is consistent in settlements reached in the last 10 years and settlements reached between 1996 and 2010. More specifically, for settlements of \$5 million and less, attorneys' fees and expenses represent 35% and 34% of the settlement amount for the 1996–2010 and 2011–2020 periods, respectively. In both periods, median plaintiffs' attorneys' fees and expenses as a percentage of settlement size is approximately 24% for settlements between \$100 million and \$500 million. As settlement size increases to \$1 billion or greater, the percentage associated with attorneys' fees and expenses falls to 11% for settlements in the 2011–2020 period and 8% for settlements reached during the 1996–2010 period.

Figure 19. **Median of Plaintiffs' Attorneys' Fees and Expenses by Size of Settlement**
Excludes Merger Objections and Settlements for \$0 to the Class



Conclusion

In 2020, there was a decline in total federal filings, resulting from a decrease within each of the five types of case categories we examine. Of these newly filed cases, the percentage that were Rule 10b-5, Section 11, and/or Section 12 increased to 64%, one of the highest proportions in recent years. The electronic technology and technology services sector represented the largest proportion of 2020 new securities class action filings and misled future performance was the most common allegation included in complaints. The Second, Third, and Ninth Circuits continue to account for a substantial proportion of new cases filed, representing more than 75% of the 2020 filings.

Since our 2019 report, the COVID-19 pandemic developed, impacting business operations, performance, revenue, and outlook. In March, the first securities class action lawsuit related to COVID-19 was filed, and another 32 COVID-19-related suits were filed through 31 December 2020. At this time, the pandemic's impact on securities class action litigation has not yet been fully determined and it will likely take months before it is fully revealed.

Between 1 January 2020 and 31 December 2020, 320 cases were resolved, a slight increase from the total number of cases resolved in 2019. Although this number of resolutions is well within the historical range for 2011–2019, the number of settled cases hit a record low while the number of dismissed cases reached a record high for the 10-year period.

For the non-merger-objection cases settled for positive values in 2020, the average settlement value was \$44 million. This average value was more than 50% higher than the 2019 average of \$28 million. Excluding settlements of \$1 billion and higher, the 2020 average settlement value was \$30 million, which is within \$1 million of the average values in 2018 and 2019. The median annual settlement value for 2020 was \$13 million, tying with 2018 for the highest recorded median value in the last 10 years.

Notes

- 1 This edition of NERA's report on Recent Trends in Securities Class Action Litigation expands on previous work by our colleagues Lucy P. Allen, Dr. Vinita Juneja, Dr. Denise Neumann Martin, Dr. Jordan Milev, Robert Patton, Dr. Stephanie Plancich, and others. The authors thank Dr. David Tabak for helpful comments on this edition. We thank Zhenyu Wang and other researchers in NERA's Securities and Finance Practice for their valuable assistance. These individuals receive credit for improving this report; any errors and omissions are those of the authors. NERA'S proprietary securities class action database and all analyses reflected in this report are limited to federal case filings and resolutions.
- 2 Data for this report were collected from multiple sources, including Institutional Shareholder Services, complaints, case dockets, Dow Jones Factiva, Bloomberg Finance, FactSet Research Systems, Nasdaq, Intercontinental Exchange, US Securities and Exchange Commission (SEC) filings, and public press reports.
- 3 NERA tracks class actions involving securities that have been filed in federal courts. Most of these cases allege violations of federal securities laws; others allege violations of common law, including breach of fiduciary duty, as with some merger-objection cases; still others are filed in federal court under foreign or state law. If multiple actions are filed against the same defendant, are related to the same allegations, and are in the same circuit, we treat them as a single filing. However, the first two actions filed in different circuits are treated as separate filings. If cases filed in different circuits are consolidated, we revise our count to reflect the consolidation. Therefore, case counts for a particular year may change over time. Different assumptions for consolidating filings would probably lead to counts that are directionally similar but may, in certain circumstances, lead observers to draw a different conclusion about short-term trends in filings.
- 4 Due to a recent revision to the methodology used to gather data on the number of listed companies on the NYSE and Nasdaq, the historical counts may differ from the counts presented in prior reports.
- 5 Most securities class actions complaints include multiple allegations. For this analysis, all allegations from the complaint are included, and as such, the total number of allegations exceeds the total number of filings.
- 6 It is important to note that due to the small number of cases in some of these categories, the findings summarized here may be driven by one or two cases.
- 7 Here the word "dismissed" is used as shorthand for all cases resolved without settlement; it includes cases where a motion to dismiss was granted (and not appealed or appealed unsuccessfully), voluntary dismissals, cases terminated by a successful motion for summary judgment, or an unsuccessful motion for class certification.
- 8 Analyses in this section exclude IPO laddering cases and merger-objection cases.
- 9 Unless otherwise noted, tentative settlements (those yet to receive court approval) and partial settlements (those covering some but not all non-dismissed defendants) are not included in our settlement statistics. We define "settlement year" as the year of the first court hearing related to the fairness of the entire settlement or the last partial settlement. Analyses in this section exclude merger-objection cases and cases that settle with no cash payment to the class. All charts and statistics reporting inflation-adjusted values are estimated as of November 2020.
- 10 NERA-Defined Investor Losses is only calculable for cases involving allegations of damages to common stock over a defined class period. As such, we have not calculated this metric for cases such as merger objections.
- 11 Analyses in this section exclude merger-objection cases and cases that settle with no cash payment to the class.

About NERA

NERA Economic Consulting (www.nera.com) is a global firm of experts dedicated to applying economic, finance, and quantitative principles to complex business and legal challenges. For over half a century, NERA's economists have been creating strategies, studies, reports, expert testimony, and policy recommendations for government authorities and the world's leading law firms and corporations. We bring academic rigor, objectivity, and real-world industry experience to bear on issues arising from competition, regulation, public policy, strategy, finance, and litigation.

NERA's clients value our ability to apply and communicate state-of-the-art approaches clearly and convincingly, our commitment to deliver unbiased findings, and our reputation for quality and independence. Our clients rely on the integrity and skills of our unparalleled team of economists and other experts backed by the resources and reliability of one of the world's largest economic consultancies. With its main office in New York City, NERA serves clients from more than 25 offices across North America, Europe, and Asia Pacific.

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A horizontal decorative bar consisting of three rectangular blocks of different shades of blue. The leftmost block is a medium blue and is the widest. The middle block is a darker blue and is narrower. The rightmost block is a lighter blue and is also narrower.

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Exhibit 13

CORNERSTONE RESEARCH

Economic and Financial Consulting and Expert Testimony

Securities Class Action Settlements

2020 Review and Analysis

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The views expressed in this report are solely those of the authors, who are responsible for the content, and do not necessarily represent the views of Cornerstone Research.

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Analyses in this report are based on 1,925 securities class actions filed after passage of the Private Securities Litigation Reform Act of 1995 (Reform Act) and settled from 1996 through year-end 2020. See page 16 for a detailed description of the research sample. For purposes of this report and related research, a settlement refers to a negotiated agreement between the parties to a securities class action that is publicly announced to potential class members by means of a settlement notice.

Highlights

The median total settlement amount dipped from a historic high in 2019, but remained 19% above the 2011–2019 median. And, continuing a trend observed in 2019, the size of issuer defendant firms (measured by median total assets) for 2020 settled cases increased 34% over the prior year.

- There were 77 settlements totaling \$4.2 billion in 2020. [\(page 3\)](#)
- The median settlement in 2020 of \$10.1 million fell 13% from 2019 (adjusted for inflation) but was still 19% higher than the prior nine-year median. [\(page 4\)](#)
- While the average settlement doubled from \$27.8 million in 2019 to \$54.5 million in 2020 (due to a few very large settlements), it was only 15% higher than the prior nine-year average. [\(page 4\)](#)
- There were six mega settlements (settlements equal to or greater than \$100 million) in 2020, ranging from \$149 million to \$1.2 billion. [\(page 3\)](#)
- For cases with Rule 10b-5 claims, the median settlement as a percentage of “simplified tiered damages” was 5.3% in 2020, slightly higher than prior years. [\(page 6\)](#)
- Median “simplified statutory damages” for cases involving only Section 11 and/or Section 12(a)(2) claims (‘33 Act claim cases) in 2020 was 32% lower than in 2019. [\(page 7\)](#)
- The proportion of settled cases alleging Generally Accepted Accounting Principles (GAAP) violations in 2020 was 42%, among the lowest of all post–Reform Act years. [\(page 9\)](#)
- Of settled cases in 2020, 55% involved an accompanying derivative action, the second-highest rate over the last 10 years.¹ [\(page 10\)](#)
- The average time from filing to settlement approval for 2020 settlements was 3.3 years. [\(page 13\)](#)

Figure 1: Post–Reform Act Settlement Statistics

(Dollars in millions)

	1996–2019	2019	2020
Number of Settlements	1,848	74	77
Total Amount	\$107,296.4	\$2,055.1	\$4,199.8
Minimum	\$0.2	\$0.5	\$0.3
Median	\$9.0	\$11.6	\$10.1
Average	\$58.1	\$27.8	\$54.5
Maximum	\$9,285.7	\$394.4	\$1,210.0

Note: Settlement dollars are adjusted for inflation; 2020 dollar equivalent figures are used.

Author Commentary

2020 Findings

Despite the unprecedented economic disruption caused by the COVID-19 pandemic in 2020, settlements in securities class actions generally continued at a pace typical of recent years. The exception was a substantial drop in the number of settlements that were announced during the month of April, but this was followed by a sharp rebound in May (see Appendix 1).²

Additionally, as described below, in several respects settlement amounts and characteristics returned to patterns more consistent with historical trends than the results observed for 2019.

In particular, the median settlement amount in 2019 was at a historically high level, driven primarily by a reduction in the number of small settlements. The reduced level of small settlements reversed in 2020, with over 30% of cases settling for amounts less than \$5 million.

In addition, public pension plan involvement as lead plaintiffs rebounded from the all-time low in 2019 to 40% of all settled cases in 2020—in line with earlier years in the last decade. Among the larger cases in 2020 (cases with “simplified tiered damages” greater than \$250 million), nearly 60% had a public pension plan as lead plaintiff.

Our research also examines the number of docket entries as a proxy for the time and effort by plaintiff counsel and/or case complexity. For 2019 settled cases, average docket entries were the highest in the last 10 years. However, in 2020, this also reversed to levels consistent with prior years.

On the other hand, continuing a trend noted in our 2019 report, the size of issuer defendant firms (measured by median total assets) for 2020 settled cases increased by 34% over 2019 and more than 125% over the prior nine years. As observed in last year’s report, the population of public firms has been declining, and those companies that remain are larger.³

In several respects, after an unusual year in 2019, settlements in 2020 represented a return to levels prevalent in prior years. However, one prominent trend continuing from 2019 is an increase in the size of issuer defendant firms.

Dr. Laarni T. Bulan
Principal, Cornerstone Research

Any disruption in settlement rates as a result of the COVID-19 pandemic appears to have been temporary, with the overall number of settlements for 2020 in line with recent years. It will likely be at least a couple of years before we learn whether COVID-19-related allegations have had an impact on other settlement trends.

Dr. Laura E. Simmons
Senior Advisor, Cornerstone Research

Looking Ahead

On average, cases take just over three years to reach settlement. Thus, trends in case filings during the last few years are relevant to anticipating developments in settlements in upcoming years.

As discussed in [Securities Class Action Filings—2020 Year in Review](#), overall, both the number and size of case filings alleging Rule 10b-5 and/or Section 11 claims were elevated in 2018–2020 compared to earlier years. Thus, we anticipate relatively high levels of settlements in upcoming years in terms of the count and dollar amounts, absent an increase in dismissal rates or developments that might affect settlement size.

In recent years, several trends in nontraditional case allegations have been observed in case filings, including allegations related to cybersecurity, cryptocurrency, and special purpose acquisition companies (SPACs). A small number of these cases have reached settlement to date but a large portion remains active. Accordingly, we expect that cases involving these issues will reach the settlement stage in future years. In addition, the emergence of cases with COVID-19-related allegations in 2020 may also affect settlement trends.

Further, as discussed in this report, the proportion of settled cases involving accompanying Securities and Exchange Commission (SEC) actions declined in 2020. However, this decline may not continue given recent findings of an increase in filings of SEC actions alleging issuer reporting and disclosure issues. (See [SEC Enforcement Activity: Public Companies and Subsidiaries—Fiscal Year 2020 Update](#), Cornerstone Research.)

—Laarni T. Bulan and Laura E. Simmons

Total Settlement Dollars

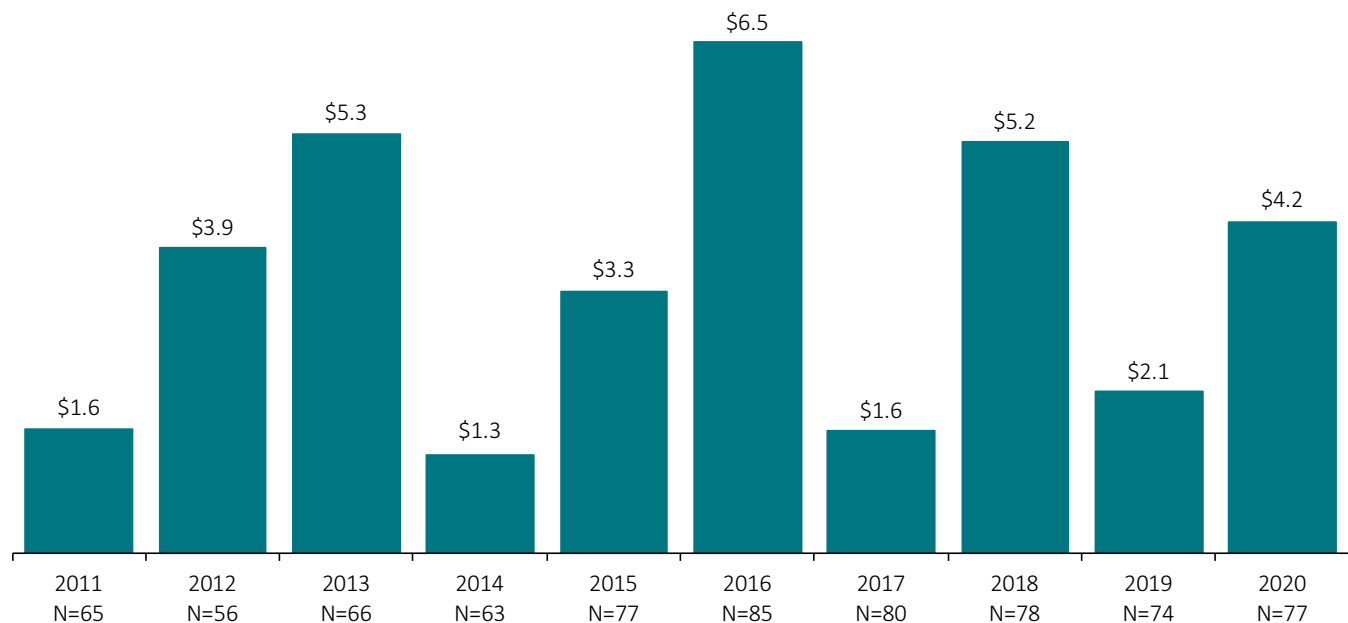
- The total value of settlements approved by courts in 2020 doubled from 2019 due to the presence of a few very large settlements. However, excluding settlements over \$1 billion, total settlement dollars declined 4% in 2020 over 2019 (adjusted for inflation).
- There were six mega settlements (equal to or greater than \$100 million) in 2020, with settlements ranging from \$149 million to \$1.2 billion. *(See Appendix 6 for additional information on mega settlements.)*

75% of total settlement dollars in 2020 came from mega settlements.

- The number of settlements approved in 2020 (77 cases) represented a modest increase from the prior nine-year average (72 cases).

**Figure 2: Total Settlement Dollars
2011–2020**

(Dollars in billions)



Note: Settlement dollars are adjusted for inflation; 2020 dollar equivalent figures are used. N refers to the number of cases.

Settlement Size

As discussed above, the median settlement amount declined from 2019. Generally, the median is more stable from year to year than the average, since the average can be affected by the presence of even a small number of large settlements.

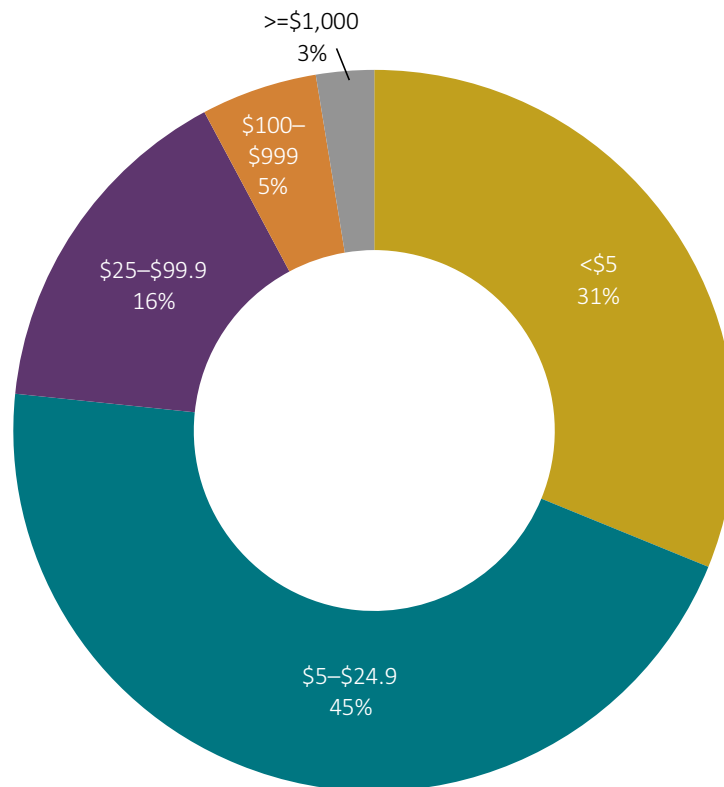
- The median settlement amount in 2020 of \$10.1 million represented a 13% decline over the historically high level observed in 2019 (adjusted for inflation), but was still elevated compared to prior years.
- The number of small settlements (less than \$5 million) also increased in 2020 to 24 cases (from 16 cases in 2019). *(See Appendix 2 for additional information on distribution of settlements.)*

- While the average settlement doubled from \$27.8 million in 2019 to \$54.5 million in 2020 (due to a few very large settlements), it was only 15% higher than the prior nine-year average. *(See Appendix 3 for an analysis of settlements by percentiles.)*
- If settlements exceeding \$1 billion are excluded, average settlement dollars in 2020 were actually 15% lower than the prior nine-year average.

The proportion of cases that settled for between \$5 million and \$25 million returned to pre-2019 levels.

Figure 3: Distribution of Settlements
2020

(Dollars in millions)



Damages Estimates

Rule 10b-5 Claims: “Simplified Tiered Damages”

“Simplified tiered damages” uses simplifying assumptions to estimate per-share damages and trading behavior. It provides a measure of potential shareholder losses that allows for consistency across a large volume of cases, thus enabling the identification and analysis of potential trends.⁴

Cornerstone Research’s prediction model finds this measure to be the most important factor in predicting settlement amounts.⁵ However, this measure is not intended to represent actual economic losses borne by shareholders. Determining any such losses for a given case requires more in-depth economic analysis.

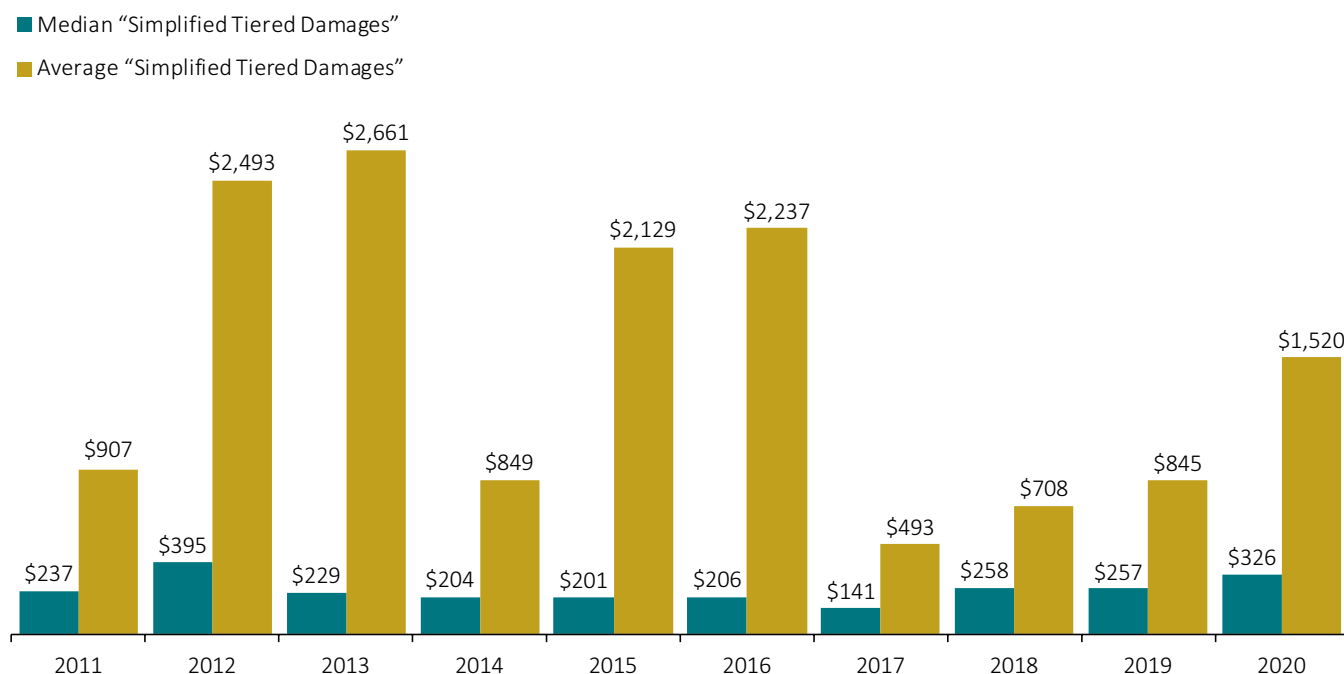
- Average “simplified tiered damages” increased for the third year in a row. (See Appendix 7 for additional information on the median and average settlements as a percentage of “simplified tiered damages.”)

Median “simplified tiered damages” was the second highest in the last decade.

- Median values provide the midpoint in a series of observations and are less affected than averages by outlier data. The increase in median “simplified tiered damages” in 2020 indicates a higher number of larger cases relative to 2019 (e.g., cases with “simplified tiered damages” exceeding \$250 million).
- Larger “simplified tiered damages” are typically associated with larger issuer defendants (measured by total assets or market capitalization of the issuer). Median total assets of issuer defendants in 2020 increased 34% from 2019 and more than 125% from the median for the prior nine years (2011–2019).

Figure 4: Median and Average “Simplified Tiered Damages” in Rule 10b-5 Cases 2011–2020

(Dollars in millions)



Note: “Simplified tiered damages” are adjusted for inflation based on class period end dates. Damages are estimated for cases alleging a claim under Rule 10b-5 (whether alone or in addition to other claims).

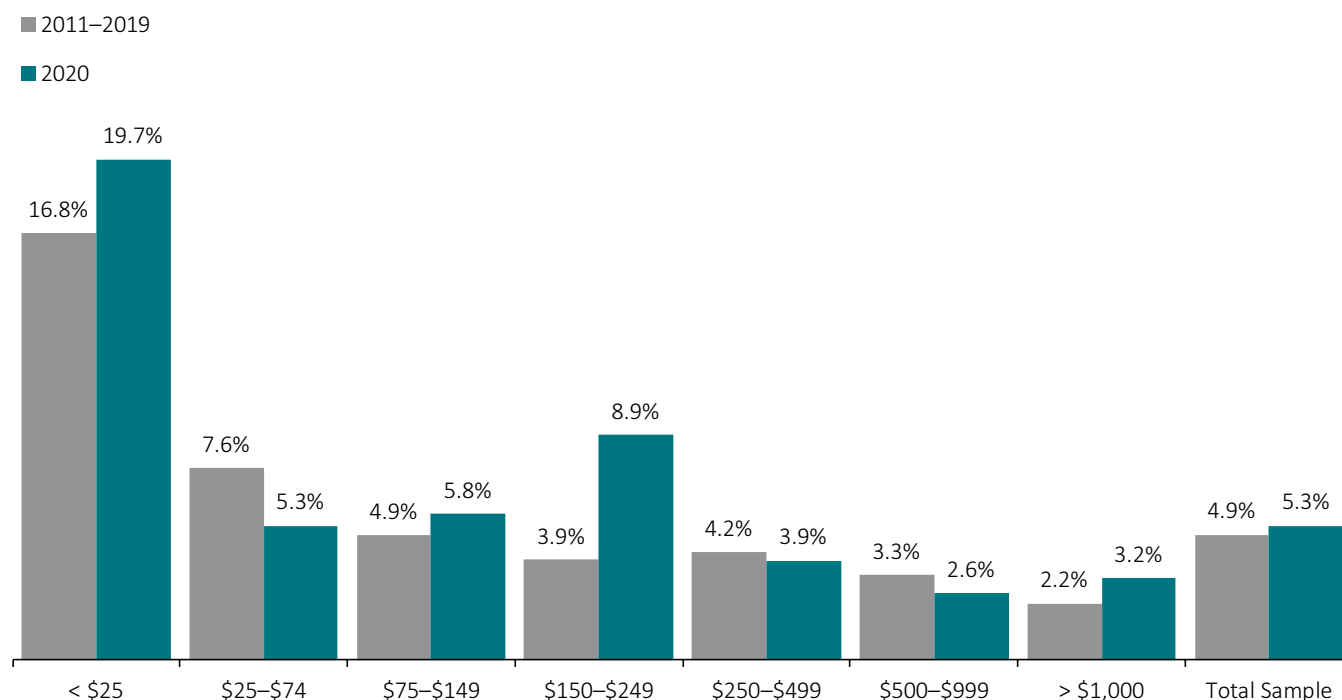
- Larger cases, as measured by “simplified tiered damages,” typically settle for a smaller percentage of damages.
- Smaller cases (less than \$25 million in “simplified tiered damages”) typically settle more quickly. In 2020, these cases settled within 3.4 years on average, compared to 4 years for cases with “simplified tiered damages” greater than \$500 million.
- Smaller cases are less likely to be associated with factors such as institutional lead plaintiffs, related actions by the SEC, or criminal charges. (See [Analysis of Settlement Characteristics](#) for a detailed discussion of these factors.)

The median settlement as a percentage of “simplified tiered damages” increased 10% over 2019.

- The unusually high median settlement as a percentage of “simplified tiered damages” (8.9%) observed among 2020 settlements with “simplified tiered damages” between \$150 million and \$250 million may, at least in part, reflect an increased level of public pension plans acting as lead plaintiffs for this group of cases.

Figure 5: Median Settlements as a Percentage of “Simplified Tiered Damages” by Damages Ranges in Rule 10b-5 Cases 2011–2020

(Dollars in millions)



Note: Damages are estimated for cases alleging a claim under Rule 10b-5 (whether alone or in addition to other claims).

'33 Act Claims: "Simplified Statutory Damages"

For '33 Act claim cases—those involving only Section 11 and/or Section 12(a)(2) claims—shareholder losses are estimated using a model in which the statutory loss is the difference between the statutory purchase price and the statutory sales price, referred to here as "simplified statutory damages."⁶ Only the offered shares are assumed to be eligible for damages.

"Simplified statutory damages" are typically smaller than "simplified tiered damages," reflecting differences in the methodologies used to estimate alleged damages per share, as well as differences in the shares eligible to be damaged (i.e., only offered shares are included).

Median "simplified statutory damages" for '33 Act claim cases in 2020 was 32% lower than in 2019.

- Cases with only '33 Act claims tend to settle for smaller median amounts than cases that include Rule 10b-5 claims.
- For 2020 settlements, the median length of time from filing to settlement hearing date for '33 Act claim cases was more than 26% shorter than the duration for '33 Act claim cases settled during 2016–2019.

Figure 6: Settlements by Nature of Claims
 2011–2020

(Dollars in millions)

	Number of Settlements	Median Settlement	Median "Simplified Statutory Damages"	Median Settlement as a Percentage of "Simplified Statutory Damages"
Section 11 and/or Section 12(a)(2) Only	77	\$8.0	\$120.3	7.4%

	Number of Settlements	Median Settlement	Median "Simplified Tiered Damages"	Median Settlement as a Percentage of "Simplified Tiered Damages"
Both Rule 10b-5 and Section 11 and/or Section 12(a)(2)	109	\$15.3	\$394.9	5.4%
Rule 10b-5 Only	525	\$8.1	\$209.5	4.6%

Note: Settlement dollars and damages are adjusted for inflation; 2020 dollar equivalent figures are used.

- Median settlements as a percentage of “simplified statutory damages” in 2020 was 31% lower than the value in 2019.

88% of cases with only ‘33 Act claims involved an underwriter as a codefendant.

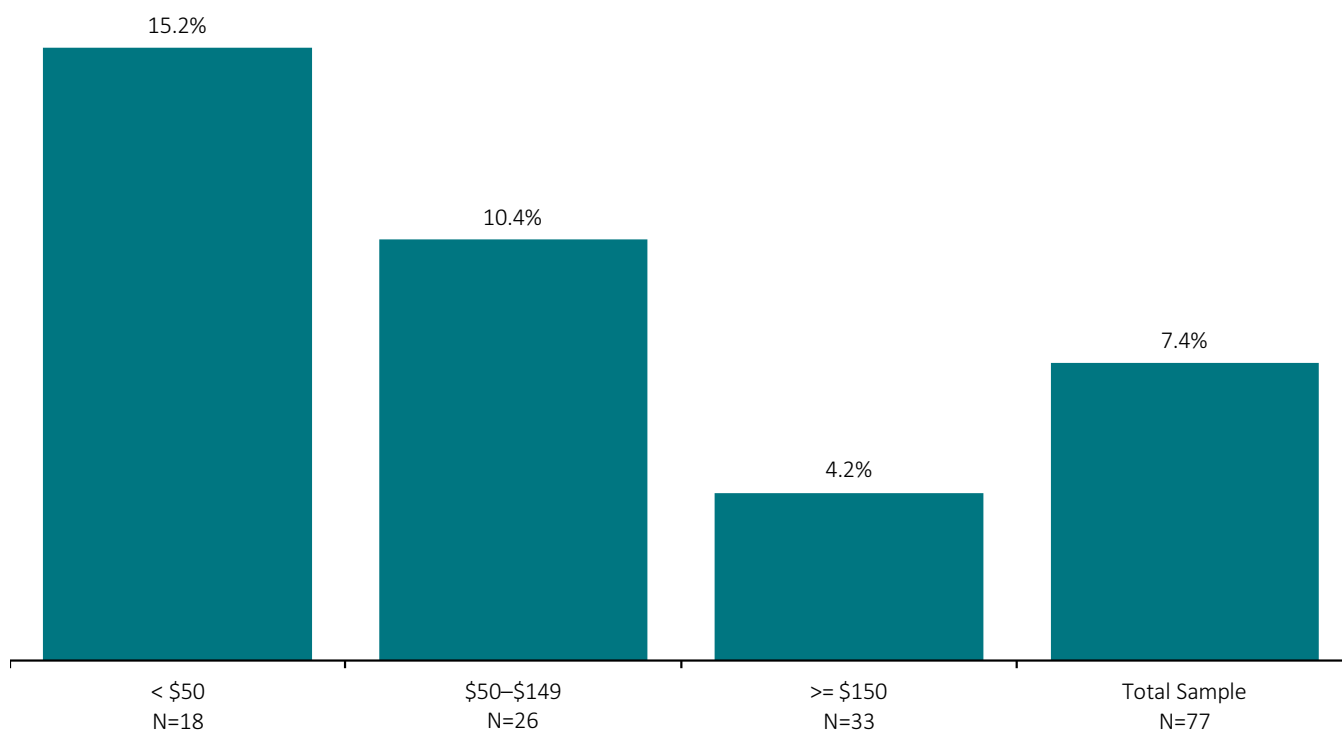
- Nearly 85% of the ‘33 Act claim cases settled from 2011 through 2020 involved an initial public offering (IPO).
- Among those cases with identifiable contributions, D&O liability insurance provided, on average, more than 90% of the total settlement fund for ‘33 Act claim cases from 2011 to 2020.⁷

The March 2018 U.S. Supreme Court decision in *Cyan Inc. v. Beaver County Employees Retirement Fund* held that ‘33 Act claim securities class actions can be brought in state court. While ‘33 Act claim cases had often been brought in state courts before *Cyan*, filing rates in state courts increased substantially following this ruling.⁸

- By year-end 2020, only six post-*Cyan* filed ‘33 Act claim cases had settled. Among these post-*Cyan* filed cases, four were filed in state court.
- Following the *Cyan* decision, the number of settlements with allegations in both state and federal court increased. Typically in these parallel suits, state court cases will involve ‘33 Act claims and the federal case will involve Rule 10b-5 claims. However, in some instances, the federal case will involve ‘33 Act claims as well.

Figure 7: Median Settlements as a Percentage of “Simplified Statutory Damages” by Damages Ranges in ‘33 Act Claim Cases 2011–2020

(Dollars in millions)



Jurisdictions of Settlements of ‘33 Act Claim Cases

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
State Court	0	1	1	0	2	4	5	4	5	5
Federal Court	15	3	7	2	3	6	3	4	5	2

Note: N refers to the number of cases. Table does not include parallel suits.

Analysis of Settlement Characteristics

GAAP Violations

This analysis examines allegations of Generally Accepted Accounting Principles (GAAP) violations in settlements of securities class actions involving Rule 10b-5 claims.⁹ For further details regarding settlements of accounting cases, see Cornerstone Research’s annual report on *Accounting Class Action Filings and Settlements*.¹⁰

- For settlements over the last 10 years, median settlements as a percentage of “simplified tiered damages” for cases involving financial statement restatements have been higher than for non-restatement cases. However, only 14.5% of cases settled in 2020 had allegations regarding restatements, a 48% decline from the prior nine-year median.
- From 2011 to 2020, median “simplified tiered damages” for cases involving GAAP allegations were 13% lower than for cases absent such allegations.

- From 2016 to 2020, among cases settled with GAAP allegations, on average, 13% involved a named auditor codefendant compared with an average of 19% from 2011 to 2015.
- The frequency of reported accounting irregularities shrunk to just over 2.9% among 2020 settlements following a high of 9.4% in 2019.
- In 2020, the median class period length was more than two years for cases with GAAP allegations. For cases without GAAP allegations, the median class period length was just over one year.

The proportion of settled cases alleging GAAP violations in 2020 was 42%, among the lowest of all post-Reform Act years.

Figure 8: Median Settlements as a Percentage of “Simplified Tiered Damages” and GAAP Allegations 2011–2020



Note: N refers to the number of cases.

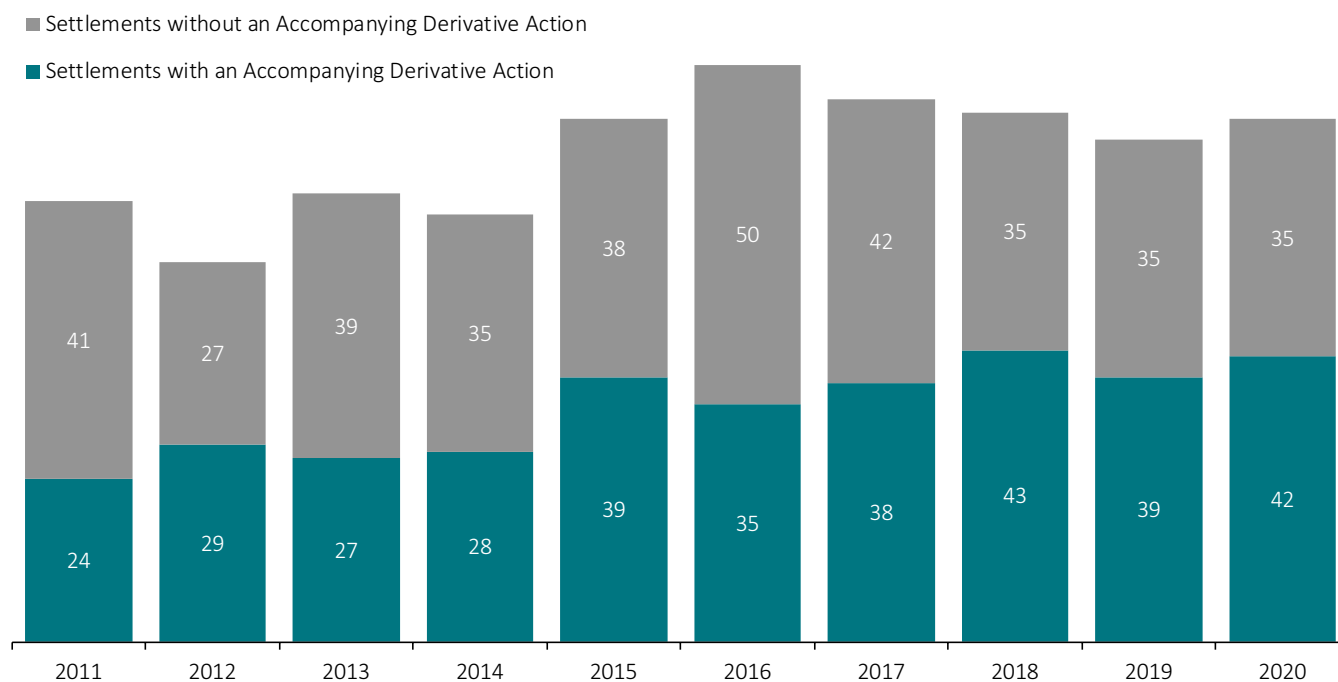
Derivative Actions

- Settled cases involving an accompanying derivative action are typically associated with both larger cases (measured by “simplified tiered damages”) and larger settlement amounts.
- For the 42 case settlements in 2020 with an accompanying derivative action, the median settlement was \$15.3 million compared to \$8.5 million for cases without a derivative action.
- Both median total assets and median “simplified tiered damages” in cases with an accompanying derivative action were more than double the median in 2019.

In 2020, 55% of settled cases involved an accompanying derivative action, the second-highest rate over the last 10 years.

- Parallel derivative suits related to class action settlements have been filed most frequently in California, Delaware, and New York. Among 2020 settlements, parallel derivative actions filed in California declined steeply (down 66% from 2019 settlements). However, 40% of settled cases with parallel derivative actions had actions filed in Delaware, the highest proportion in the past decade.

Figure 9: Frequency of Derivative Actions
 2011–2020



Corresponding SEC Actions

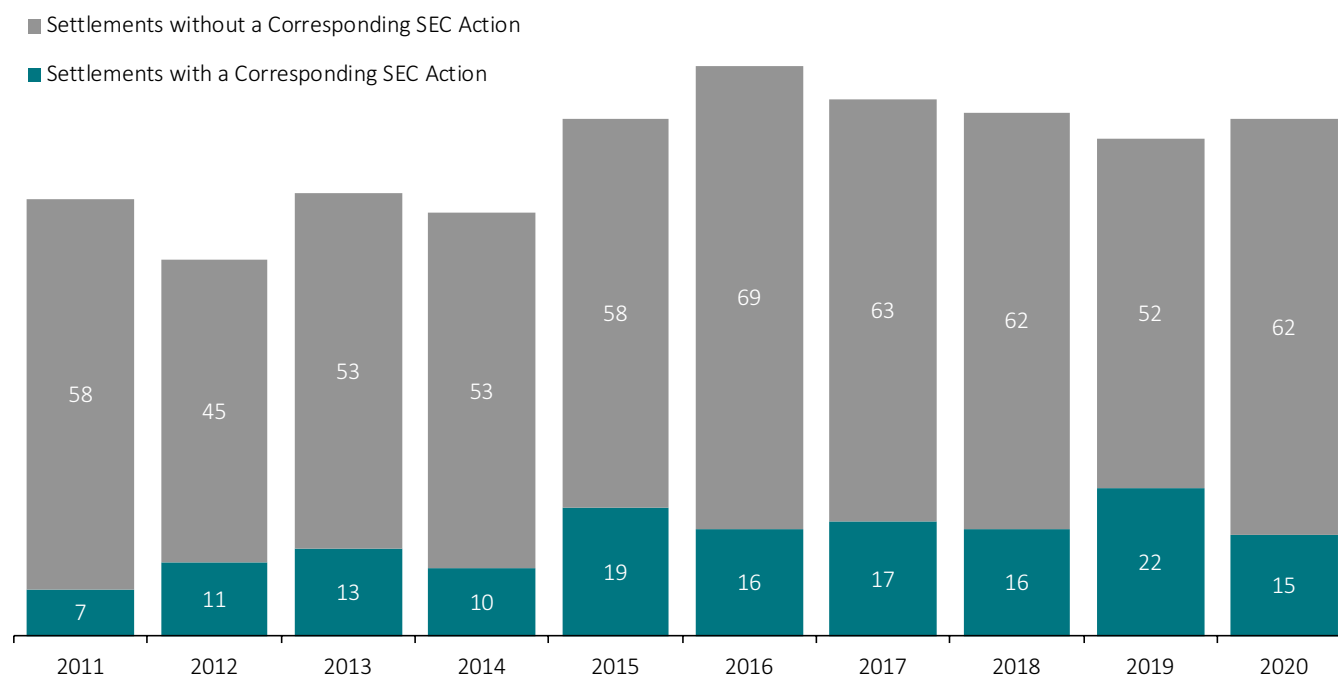
- Cases with an SEC action related to the allegations are typically associated with significantly higher settlement amounts.¹¹
- From 2011 to 2020, median settlement amounts (adjusted for inflation) for cases that involved a corresponding SEC action were 11% higher than for cases without such an action.

For cases settled during 2016–2020, 36% of cases with a corresponding SEC action involved a distressed issuer defendant, that is, an issuer that had either declared bankruptcy or was delisted from a major U.S. exchange prior to settlement.

In 2020, the rate of settled cases involving a corresponding SEC action fell 32% from the prior year.

- Settled cases with corresponding SEC actions have involved GAAP allegations less frequently in recent years. From 2011 to 2015, 85% of these cases involved GAAP allegations, compared to 70% from 2016 to 2020.
- Cases involving corresponding SEC actions may also include related criminal charges in connection with the allegations covered by the underlying class action. From 2016 to 2020, 35% of settled cases with an SEC action had related criminal charges.¹²

Figure 10: Frequency of SEC Actions
 2011–2020



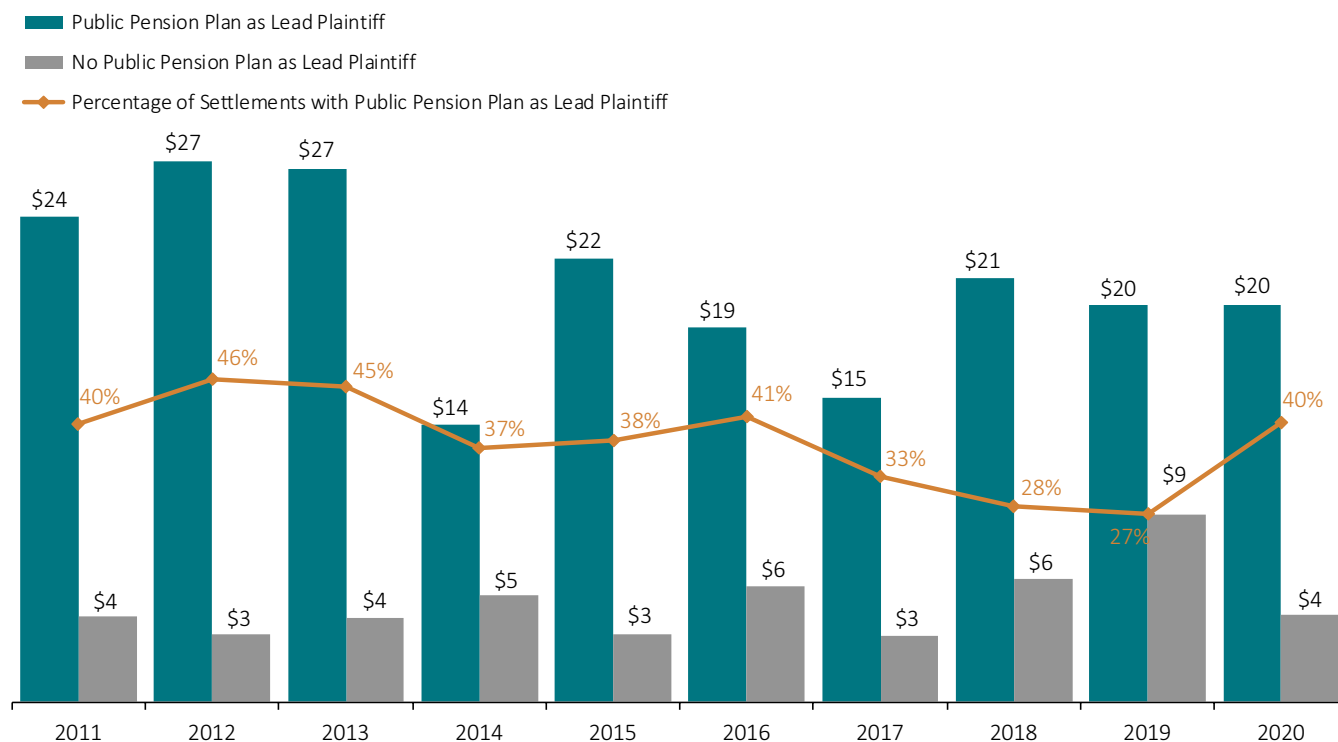
Institutional Investors

- Despite the variation in the frequency of institutional investors acting as lead or co-lead plaintiffs in any given settlement year, institutional investors, including public pension plans, are consistently involved in larger cases, that is, cases with higher “simplified tiered damages” and higher total assets.
- Median “simplified tiered damages” for cases involving an institutional investor as a lead plaintiff in 2020 were nearly seven-and-a-half times higher than for cases without institutional investor involvement in a lead role.
- Median total assets of defendant firms for 2020 case settlements in which an institutional investor was a lead or co-lead plaintiff were more than 15 times the total assets for cases without an institutional investor acting as a lead plaintiff.
- Among 2020 settled cases that had an institutional investor as a lead plaintiff, 60% had a parallel derivative action, 22% had a corresponding SEC action, and 16% involved a criminal charge.
- In 2020, the median market capitalization decline during the alleged class period in cases with a public pension as a lead plaintiff was \$1.7 billion compared to \$419.6 million for cases without a public pension leading the class.
- The vast majority of cases taking more than five years to resolve (measured as the duration from filing date to settlement hearing date) involved a public pension as a lead plaintiff.

The frequency of public pension plans as lead plaintiff rebounded to levels observed earlier in the last decade.

Figure 11: Median Settlement Amounts and Public Pension Plans 2011–2020

(Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2020 dollar equivalent figures are used.

Time to Settlement and Case Complexity

- The average time from filing to settlement in 2020 was 3.3 years, a small decrease relative to the prior nine-year average.
- Of cases in 2020 that took more than five years to settle, the median assets of the defendant firms (\$7.7 billion) as well as median “simplified tiered damages” (\$909 million) were substantially higher than in previous years.
- In 2020, 21% of cases settled within two years of the filing date. Of these 16 cases, nine settled before a ruling on motion to dismiss.

Cases that settled for more than \$100 million in 2020 took an average of 4.6 years from filing to settlement.

- The number of docket entries at the time of the settlement may reflect case complexity. This factor has also been used in prior research as a proxy for attorney effort.¹³ The average number of docket entries declined 19% in 2020 compared to 2019. Among cases that settled for more than \$100 million, however, the average number of docket entries jumped 64%.

Figure 12: Median Settlement by Duration from Filing Date to Settlement Hearing Date 2011–2020

(Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2020 dollar equivalent figures are used. N refers to the number of cases.

Case Stage at the Time of Settlement

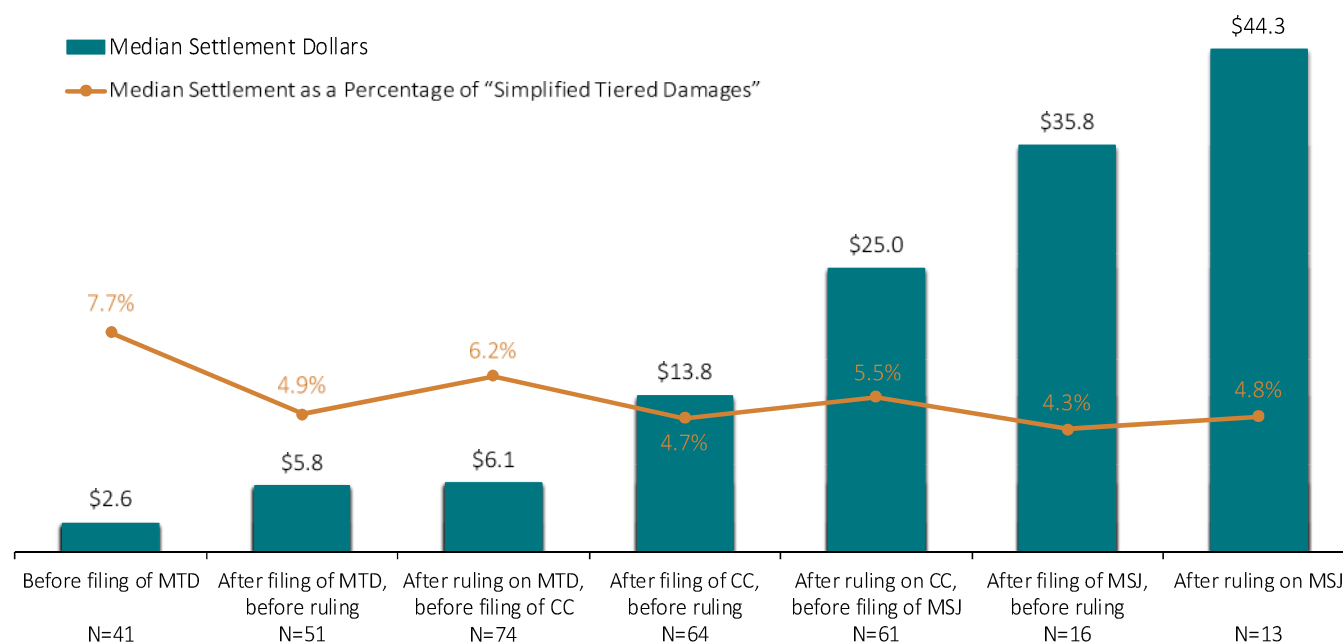
In collaboration with Stanford Securities Litigation Analytics (SSLA),¹⁴ this report analyzes settlements in relation to the stage in the litigation process at the time of settlement.

- In 2020, 57% of cases were resolved before progressing to the stage of filing a motion for class certification.
- The proportion of cases settling sometime after a ruling on a motion for class certification was 21% in 2020 compared to 28% in the prior four years.
- In 2020, median “simplified tiered damages” was more than six times larger for cases settled following a filing for a motion for class certification than for cases that resolved prior to such a motion being filed.
- Median “simplified tiered damages” for 2020 cases that settled after the filing of a motion for summary judgment (MSJ) was more than four times the median for cases that settled before a MSJ filing.
- Cases settling further along in the litigation process are more likely to have additional characteristics frequently associated with more complex matters. Of those that settled after a MSJ filing, 71% of 2016–2020 cases had an institutional investor lead plaintiff and nearly 24% were associated with criminal charges.

The average time to reach a ruling on a motion for class certification among 2020 settlements was 2.8 years

Figure 13: Median Settlement Dollars and Resolution Stage at Time of Settlement 2016–2020

(Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2020 dollar equivalent figures are used. MTD refers to “motion to dismiss,” CC refers to “class certification,” and MSJ refers to “motion for summary judgment.” This analysis is limited to cases alleging Rule 10b-5 claims.

Cornerstone Research's Settlement Prediction Analysis

This research applies regression analysis to examine the relationships between settlement outcomes and certain security case characteristics. Regression analysis is employed to better understand and predict the total settlement amount, given the characteristics of a particular securities case. Regression analysis can also be applied to estimate the probabilities associated with reaching alternative settlement levels. It is also helpful in exploring hypothetical scenarios, including how the presence or absence of particular factors affects predicted settlement amounts.

Determinants of Settlement Outcomes

Based on the research sample of post-Reform Act cases that settled through December 2020, the factors that were important determinants of settlement amounts included the following:

- “Simplified tiered damages”
- Maximum Dollar Loss (MDL)—market capitalization change from its peak to post-disclosure value
- Most recently reported total assets of the issuer defendant firm
- Number of entries on the lead case docket
- The year in which the settlement occurred
- Whether there were accounting allegations related to the alleged class period
- Whether a ruling on motion for class certification had occurred
- Whether there was a corresponding SEC action against the issuer, other defendants, or related parties
- Whether there were criminal charges against the issuer, other defendants, or related parties with similar allegations to those included in the underlying class action complaint
- Whether a third party, specifically an outside auditor or underwriter, was named as a codefendant

- Whether Section 11 and/or Section 12(a) claims were alleged in addition to Rule 10b-5 claims
- Whether the issuer defendant was distressed
- Whether a public pension was a lead plaintiff
- Whether the plaintiffs alleged that securities other than common stock were damaged

Regression analyses show that settlements were higher when “simplified tiered damages,” MDL, issuer defendant asset size, the number of docket entries was larger, whether a ruling on a motion for class certification had occurred, or when Section 11 and/or Section 12(a) claims were alleged in addition to Rule 10b-5 claims.

Settlements were also higher in cases involving accounting allegations, a corresponding SEC action, criminal charges, a public pension involved as lead plaintiff, a third party such as an outside auditor or underwriter named as a codefendant, or securities other than common stock that were alleged to be damaged.

Settlements were lower if the settlement occurred in 2012 or later, or if the issuer was distressed.

More than 70% of the variation in settlement amounts can be explained by the factors discussed above.

Research Sample

- The database used in this report contains cases alleging fraudulent inflation in the price of a corporation's common stock (i.e., excluding cases with alleged classes of only bondholders, preferred stockholders, etc., and excluding cases alleging fraudulent depression in price and mergers and acquisitions cases).
- The sample is limited to cases alleging Rule 10b-5, Section 11, and/or Section 12(a)(2) claims brought by purchasers of a corporation's common stock. These criteria are imposed to ensure data availability and to provide a relatively homogeneous set of cases in terms of the nature of the allegations.
- The current sample includes 1,925 securities class actions filed after passage of the Reform Act (1995) and settled from 1996 through 2020. These settlements are identified based on a review of case activity collected by Securities Class Action Services LLC (SCAS).¹⁵
- The designated settlement year, for purposes of this report, corresponds to the year in which the hearing to approve the settlement was held.¹⁶ Cases involving multiple settlements are reflected in the year of the most recent partial settlement, provided certain conditions are met.¹⁷

Data Sources

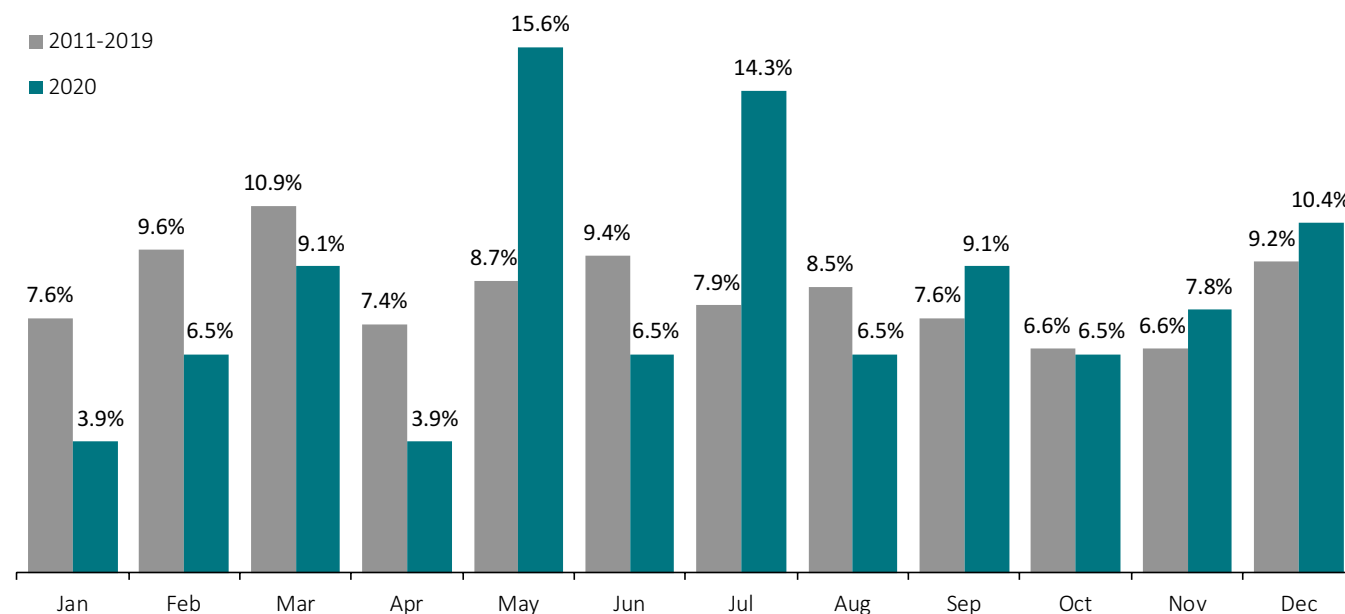
In addition to SCAS, data sources include Dow Jones Factiva, Bloomberg, the Center for Research in Security Prices (CRSP) at University of Chicago Booth School of Business, Standard & Poor's Compustat, Refinitiv Eikon, court filings and dockets, SEC registrant filings, SEC litigation releases and administrative proceedings, LexisNexis, Stanford Securities Litigation Analytics (SSLA), Securities Class Action Clearinghouse (SCAC), and public press.

Endnotes

- ¹ Derivative settlements are the subject of our ongoing research, which will be reported on separately in the future.
- ² The year designation for purposes of this research on securities class action settlements is based on the settlement hearing date (with some modifications as described in endnote 17). However, for purposes of this analysis of monthly settlement rates, the preliminary settlement announcement date (the “tentative settlement date”) was used.
- ³ *Securities Class Action Settlements—2019 Review and Analysis*, Cornerstone Research (2020). See also “Chasing Right Stocks to Buy Is Critical with Fewer Choices but Big Winners,” *Investor’s Business Daily*, November 27, 2020.
- ⁴ The “simplified tiered damages” approach used for purposes of this settlement research does not examine the mix of information associated with the specific dates listed in the plan of allocation, but simply applies the stock price movements on those dates to an estimate of the “true value” of the stock during the alleged class period (or “value line”). This proxy for damages utilizes an estimate of the number of shares damaged based on reported trading volume and the number of shares outstanding. Specifically, reported trading volume is adjusted using volume reduction assumptions based on the exchange on which the issuer defendant’s common stock is listed. No adjustments are made to the underlying float for institutional holdings, insider trades, or short-selling activity during the alleged class period. Because of these and other simplifying assumptions, the damages measures used in settlement outcome modeling may be overstated relative to damages estimates developed in conjunction with case-specific economic analysis.
- ⁵ Laarni T. Bulan, Ellen M. Ryan, and Laura E. Simmons, *Estimating Damages in Settlement Outcome Modeling*, Cornerstone Research (2017).
- ⁶ The statutory purchase price is the lesser of the security offering price or the security purchase price. Prior to the first complaint filing date, the statutory sales price is the price at which the security was sold. After the first complaint filing date, the statutory sales price is the greater of the security sales price or the security price on the first complaint filing date. Similar to “simplified tiered damages,” the estimation of “simplified statutory damages” makes no adjustments to the underlying float for institutional holdings, insider trades, or short-selling activity. Shares subject to a lock-up period are not added to the float for purposes of this calculation.
- ⁷ Based on data for cases where the amount contributed by the D&O liability insurer was verified in settlement materials and/or the issuer defendant’s SEC filings—approximately 83% of all ‘33 Act cases. Data supplemented with additional observations from the SSLA.
- ⁸ This increase reversed in 2020. As noted in *Securities Class Action Filings—2020 Year in Review*, Cornerstone Research (2021), this reversal was likely a result of the March 2020 Delaware Supreme Court decision in *Salzberg v. Sciabacucchi* regarding the validity and enforceability of federal forum-selection provisions in corporate charters.
- ⁹ The three categories of accounting issues analyzed in Figure 8 of this report are: (1) GAAP violations; (2) restatements—cases involving a restatement (or announcement of a restatement) of financial statements; and (3) accounting irregularities—cases in which the defendant has reported the occurrence of accounting irregularities (intentional misstatements or omissions) in its financial statements.
- ¹⁰ *Accounting Class Action Filings and Settlements—2020 Review and Analysis*, Cornerstone Research (2021), forthcoming in spring 2021.
- ¹¹ As noted previously, it could be that the merits in such cases are stronger, or simply that the presence of a corresponding SEC action provides plaintiffs with increased leverage when negotiating a settlement. For purposes of this research, an SEC action is evidenced by the presence of a litigation release or an administrative proceeding posted on www.sec.gov involving the issuer defendant or other named defendants with allegations similar to those in the underlying class action complaint.
- ¹² Identification of a criminal charge and/or criminal indictment based on review of SEC filings and public press. For purposes of this research, criminal charges and/or indictments are collectively referred to as “criminal charges.”
- ¹³ Docket entries reflect the number of entries on the court docket for events in the litigation and have been used in prior research as a proxy for the amount of plaintiff attorney effort involved in resolving securities cases. See Laura Simmons, “The Importance of Merit-Based Factors in the Resolution of 10b-5 Litigation,” University of North Carolina at Chapel Hill Doctoral Dissertation, 1996; Michael A. Perino, “Institutional Activism through Litigation: An Empirical Analysis of Public Pension Fund Participation in Securities Class Actions,” St. John’s Legal Studies Research Paper No. 06-0055, 2006.
- ¹⁴ Stanford Securities Litigation Analytics (SSLA) tracks and collects data on private, shareholder securities litigation and public enforcements brought by the SEC and the U.S. Department of Justice. The SSLA dataset includes all traditional class actions, SEC actions, and DOJ criminal actions filed since 2000. Available on a subscription basis at <https://sla.law.stanford.edu/>.
- ¹⁵ Available on a subscription basis. For further details see <https://www.issgovernance.com/securities-class-action-services/>.
- ¹⁶ Movements of partial settlements between years can cause differences in amounts reported for prior years from those presented in earlier reports.
- ¹⁷ This categorization is based on the timing of the settlement hearing date. If a new partial settlement equals or exceeds 50% of the then-current settlement fund amount, the entirety of the settlement amount is re-categorized to reflect the settlement hearing date of the most recent partial settlement. If a subsequent partial settlement is less than 50% of the then-current total, the partial settlement is added to the total settlement amount and the settlement hearing date is left unchanged.

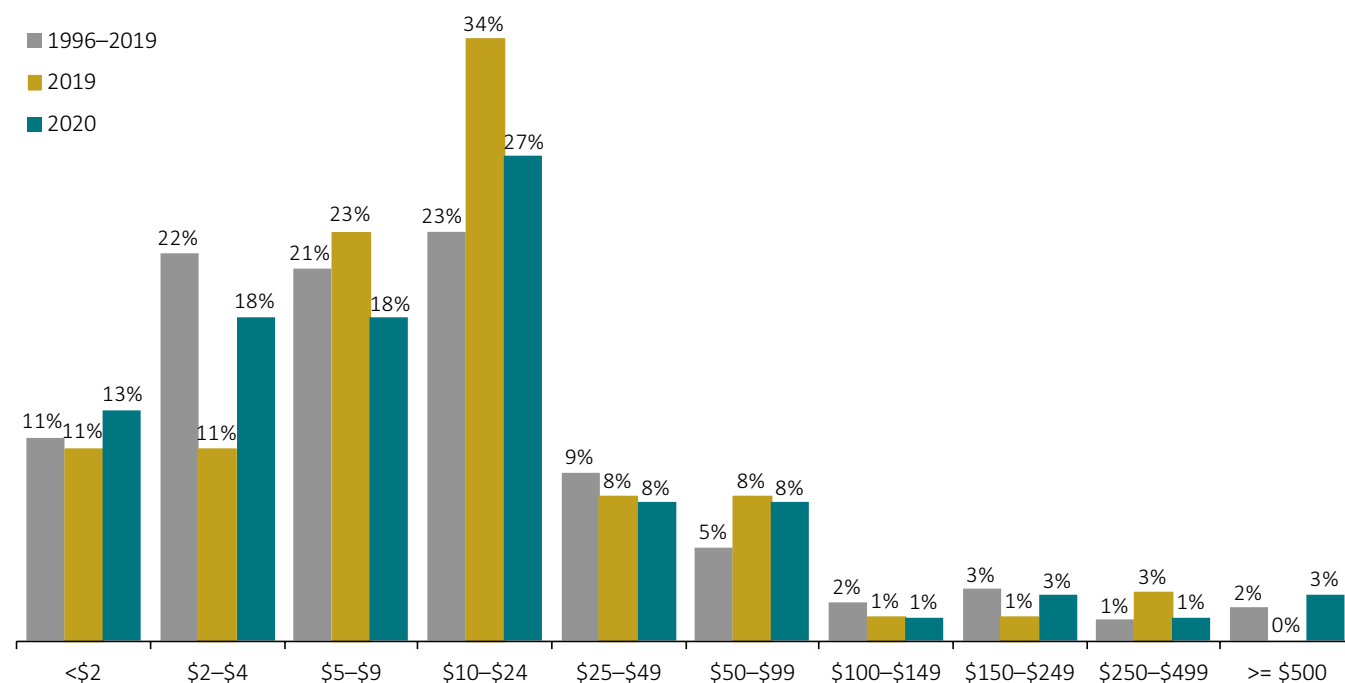
Appendices

Appendix 1: Initial Announcements of Settlements by Month



Appendix 2: Distribution of Post-Reform Act Settlements

(Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2020 dollar equivalent figures are used.

Appendix 3: Settlement Percentiles

(Dollars in millions)

	Average	10th	25th	Median	75th	90th
2011	\$24.1	\$2.1	\$3.1	\$6.6	\$20.7	\$74.6
2012	\$69.0	\$1.4	\$3.0	\$10.6	\$40.0	\$129.6
2013	\$80.3	\$2.1	\$3.3	\$7.2	\$24.6	\$91.7
2014	\$19.9	\$1.8	\$3.1	\$6.6	\$14.4	\$54.7
2015	\$43.0	\$1.4	\$2.3	\$7.1	\$17.7	\$102.6
2016	\$76.1	\$2.0	\$4.5	\$9.2	\$35.6	\$157.4
2017	\$19.5	\$1.6	\$2.7	\$5.5	\$16.1	\$37.4
2018	\$66.9	\$1.6	\$3.7	\$11.6	\$25.5	\$53.7
2019	\$27.8	\$1.5	\$5.7	\$11.6	\$20.2	\$50.6
2020	\$54.5	\$1.4	\$3.3	\$10.1	\$20.0	\$53.2

Note: Settlement dollars are adjusted for inflation; 2020 dollar equivalent figures are used.

Appendix 4: Select Industry Sectors

2011–2020

(Dollars in millions)

Industry	Number of Settlements	Median Settlement	Median “Simplified Tiered Damages”	Median Settlement as a Percentage of “Simplified Tiered Damages”
Financial	102	\$17.2	\$421.9	4.8%
Technology	101	\$8.3	\$210.0	4.9%
Pharmaceuticals	98	\$6.7	\$215.9	3.7%
Retail	37	\$10.0	\$243.3	4.1%
Telecommunications	24	\$8.6	\$274.1	4.3%
Healthcare	14	\$12.5	\$140.2	6.1%

Note: Settlement dollars and “simplified tiered damages” are adjusted for inflation; 2020 dollar equivalent figures are used. “Simplified tiered damages” are calculated only for cases involving Rule 10b-5 claims.

Appendix 5: Settlements by Federal Circuit Court 2011–2020

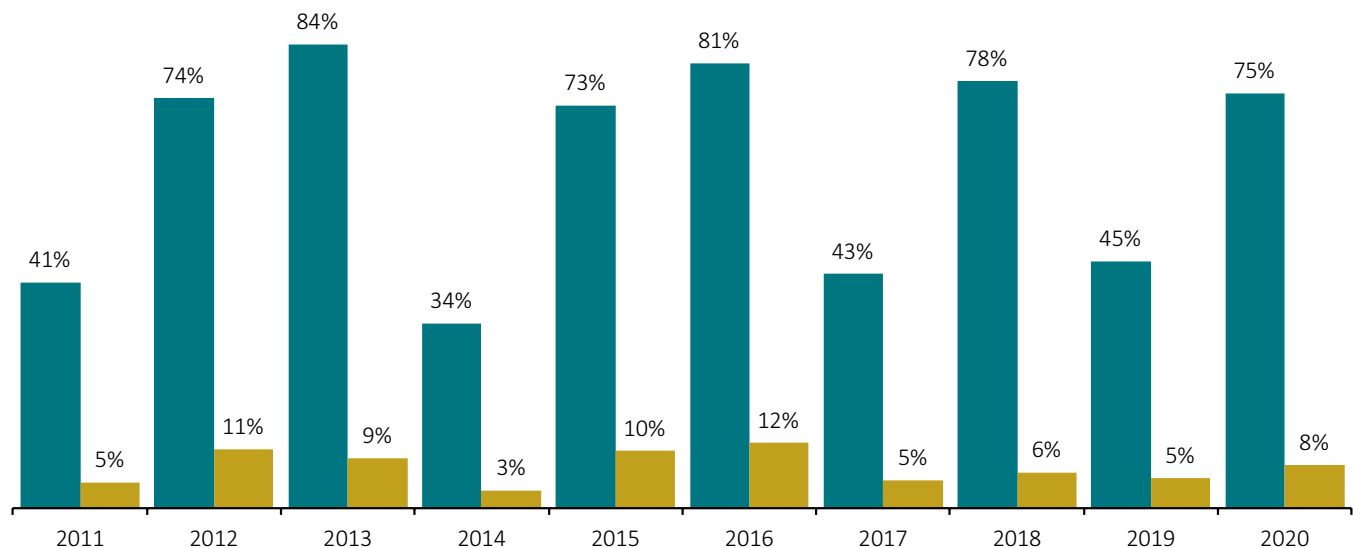
(Dollars in millions)

Circuit	Number of Settlements	Median Settlement	Median Settlement as a Percentage of “Simplified Tiered Damages”
First	22	\$10.3	3.5%
Second	181	\$9.4	4.7%
Third	56	\$7.7	5.2%
Fourth	25	\$16.9	4.0%
Fifth	34	\$9.4	4.3%
Sixth	26	\$12.7	6.9%
Seventh	40	\$12.0	4.0%
Eighth	13	\$10.0	6.1%
Ninth	178	\$7.3	4.8%
Tenth	15	\$6.4	5.6%
Eleventh	37	\$12.8	5.1%
DC	4	\$23.7	2.1%

Note: Settlement dollars are adjusted for inflation; 2020 dollar equivalent figures are used. Settlements as a percentage of “simplified tiered damages” are calculated only for cases alleging Rule 10b-5 claims.

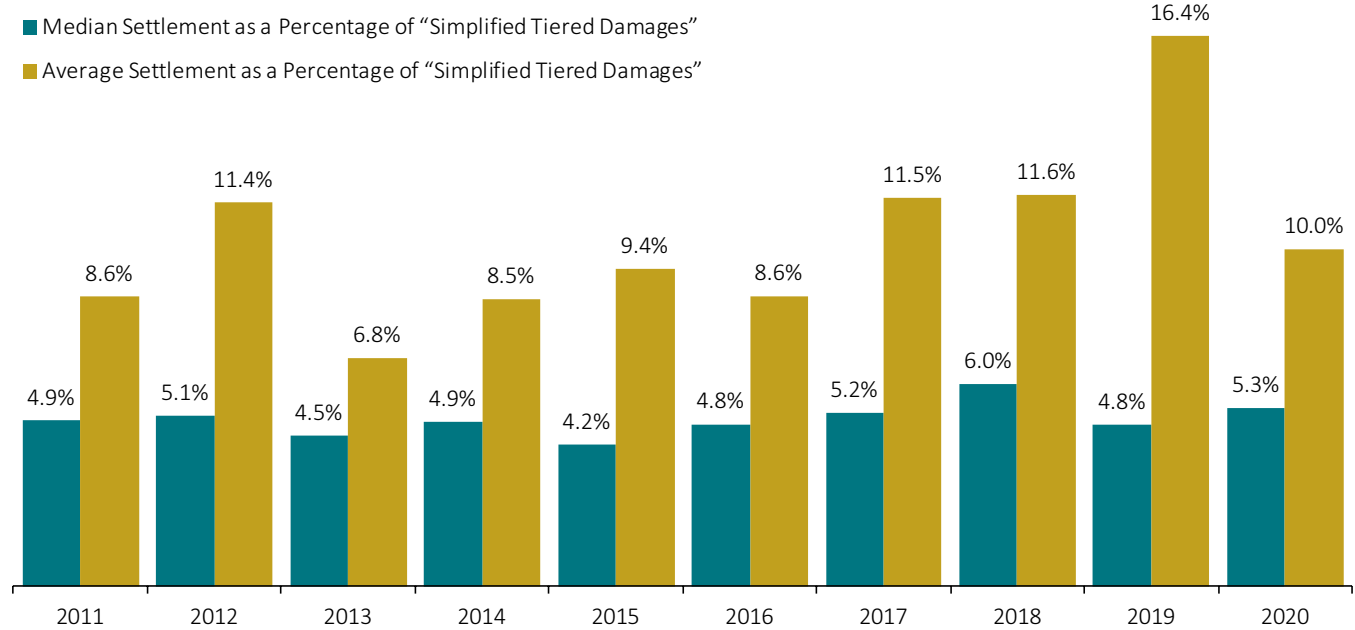
Appendix 6: Mega Settlements 2011–2020

- Total Mega Settlement Dollars as a Percentage of All Settlement Dollars
- Number of Mega Settlements as a Percentage of All Settlements



Note: Mega settlements are defined as total settlement funds equal to or greater than \$100 million. Settlement dollars are adjusted for inflation; 2020 dollar equivalent figures are used.

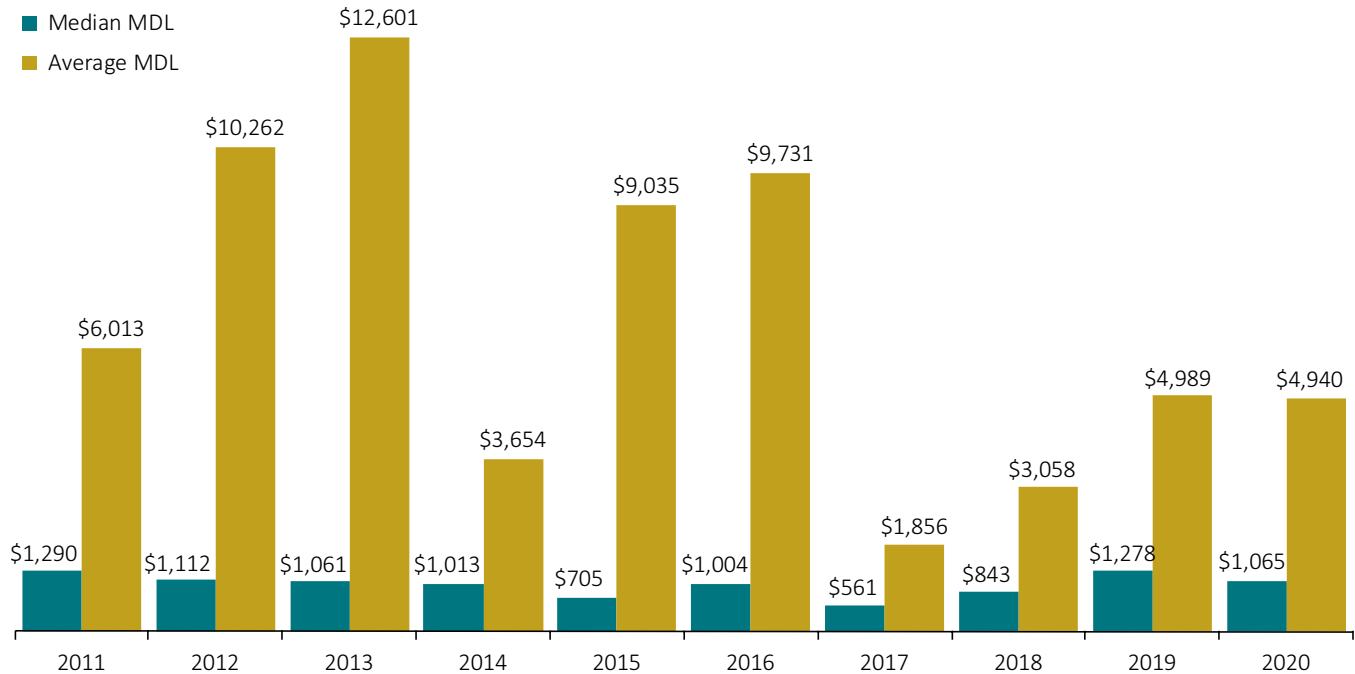
Appendix 7: Median and Average Settlements as a Percentage of “Simplified Tiered Damages” 2011–2020



Note: “Simplified tiered damages” are calculated only for cases alleging Rule 10b-5 claims.

Appendix 8: Median and Average Maximum Dollar Loss (MDL) 2011–2020

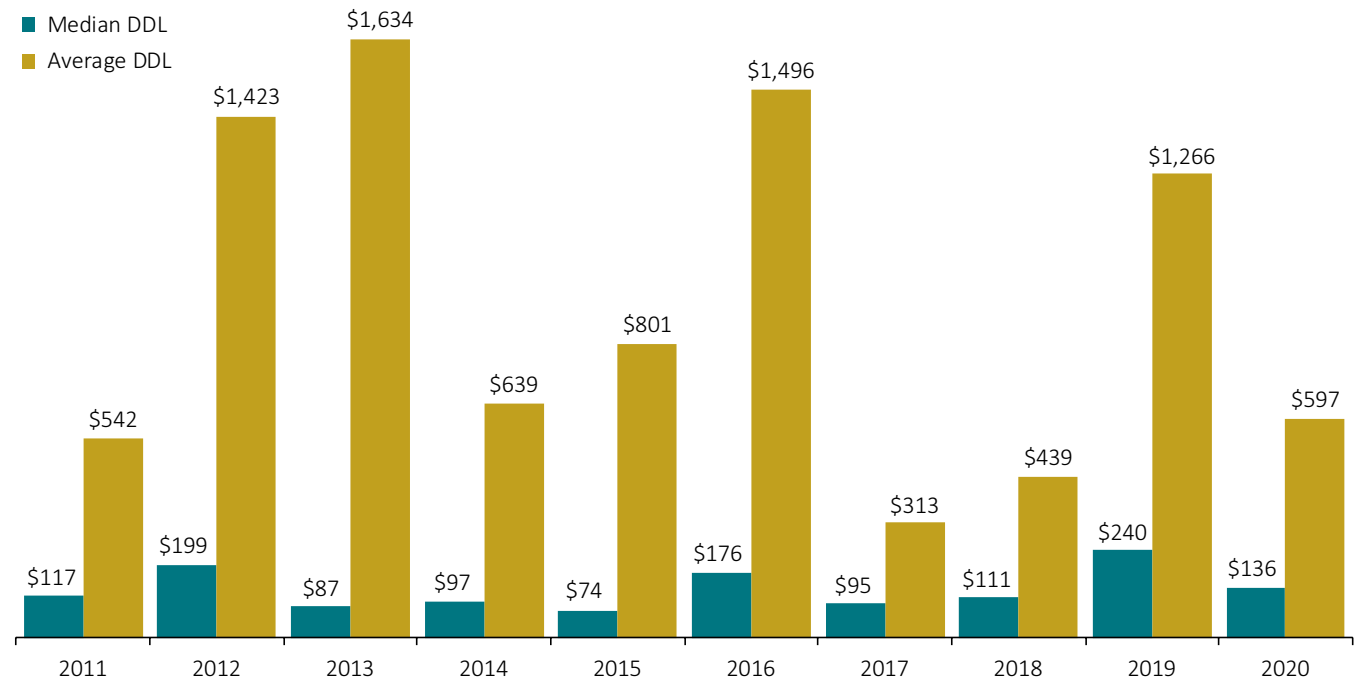
(Dollars in millions)



Note: MDL is adjusted for inflation based on class period end dates. MDL is the dollar value change in the defendant firm’s market capitalization from the trading day with the highest market capitalization during the class period to the trading day immediately following the end of the class period.

Appendix 9: Median and Average Disclosure Dollar Loss (DDL) 2011–2020

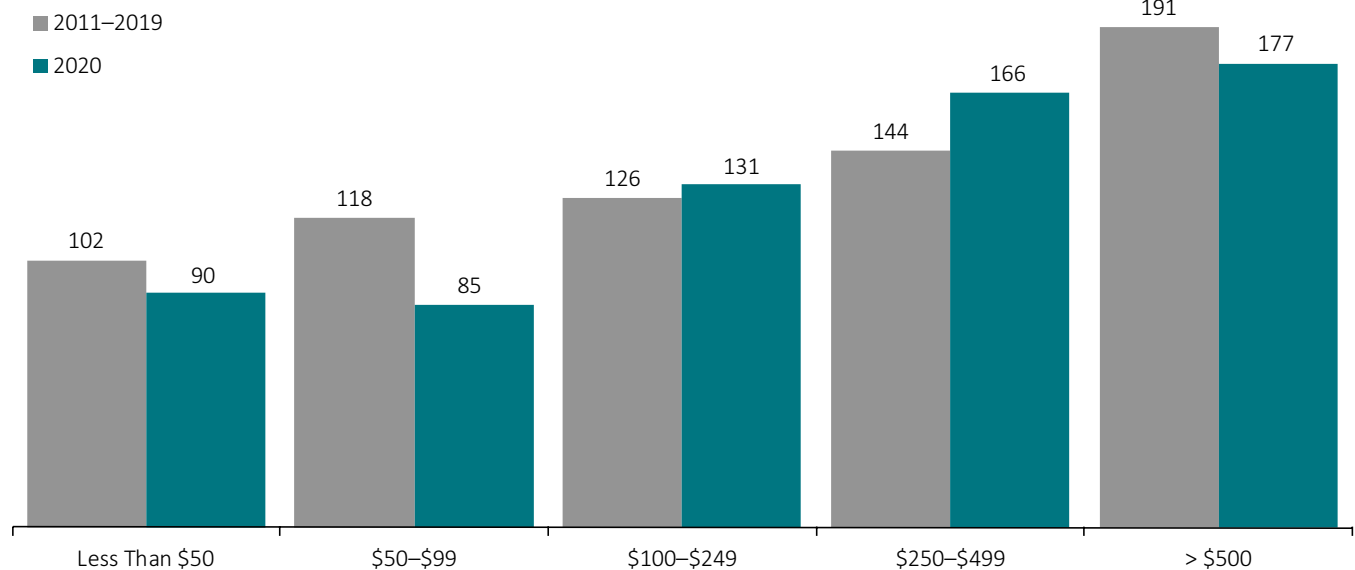
(Dollars in millions)



Note: DDL is adjusted for inflation based on class period end dates. DDL is the dollar value change in the defendant firm’s market capitalization between the trading day immediately preceding the end of the class period and the trading day immediately following the end of the class period. This analysis excludes cases alleging ‘33 Act claims only.

Appendix 10: Median Docket Entries by “Simplified Tiered Damages” Range 2011–2020

(Dollars in millions)



Note: “Simplified tiered damages” are calculated only for cases alleging Rule 10b-5 claims.

About the Authors

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Laarni Bulan is a principal in Cornerstone Research's Boston office, where she specializes in finance. Her work has focused on securities damages, loss causation, and class certification issues, insider trading, merger and firm valuation, risk management, and corporate finance issues. She has also consulted on cases related to market manipulation and trading behavior, financial institutions and the credit crisis, derivatives, foreign exchange, and securities clearing and settlement.

Dr. Bulan has published several academic articles in peer-reviewed journals. Her research covers topics in dividend policy, capital structure, executive compensation, corporate governance, and real options. Prior to joining Cornerstone Research, Dr. Bulan had a joint appointment at Brandeis University as an assistant professor of finance in its International Business School and in the economics department.

Laura E. Simmons

Ph.D., University of North Carolina at Chapel Hill; M.B.A., University of Houston; B.B.A., University of Texas at Austin

Laura Simmons is a senior advisor with Cornerstone Research. She is a certified public accountant and has more than 25 years of experience in accounting practice and economic and financial consulting. Dr. Simmons has focused on damage and liability issues in securities and ERISA litigation, as well as on accounting issues arising in a variety of complex commercial litigation matters. She has served as a testifying expert in litigation involving accounting analyses, securities case damages, ERISA matters, and research on securities lawsuits.

Dr. Simmons's research on pre- and post-Reform Act securities litigation settlements has been published in a number of reports and is frequently cited in the public press and legal journals. She has spoken at various conferences and appeared as a guest on CNBC addressing the topic of securities case settlements. She has also published in academic journals, including research focusing on the intersection of accounting and litigation. Dr. Simmons was previously an accounting faculty member at the Mason School of Business at the College of William & Mary. From 1986 to 1991, she was an accountant with Price Waterhouse.

The authors gratefully acknowledge the research efforts and significant contributions of their colleagues at Cornerstone Research in the writing and preparation of this annual update.

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Exhibit 14

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DANIEL LUNA, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

MARVELL TECHNOLOGY GROUP, *et al.*,

Defendants.

No. C 15-05447 WHA

(Consolidated)

**ORDER GRANTING MOTION
FOR FINAL APPROVAL OF
PROPOSED CLASS SETTLEMENT
AND GRANTING IN PART
MOTION FOR ATTORNEY'S
FEES AND EXPENSES**

INTRODUCTION

In this shareholder class action, lead plaintiff moves for final approval of a proposed settlement agreement. Lead counsel also move for attorney's fees and reimbursement of litigation expenses. Defendants do not oppose. For the reasons explained below, the motion for final approval of class settlement is **GRANTED**. Lead counsel's motion for attorney's fees and expenses is **GRANTED IN PART**.

STATEMENT

Prior orders set forth the detailed background of this case (Dkt. Nos. 138, 202). In brief, lead plaintiff Plumbers and Pipefitters National Pension Fund asserted class claims against defendants Marvell Technology Group, Ltd. and its former CEO Sehat Sutardja for violations of

the Securities and Exchange Act based on allegedly fraudulent pull-in sales which caused the price of Marvell common stock to be artificially inflated.

Lead plaintiff filed a consolidated complaint in March 2016, asserting claims against defendants for violations of Sections 10(b) and 20(a) of the Exchange Act and Rule 10b-5 promulgated thereunder. Orders granted in part and denied in part defendants' motions to dismiss. A subsequent order certified the following class:

All persons and entities who purchased or otherwise acquired the common stock of Marvell Technology Group, Ltd. ("Marvell" or the "Company") during the period from February 19, 2015 through December 7, 2015, inclusive (the "Class Period"), and were damaged thereby. Excluded from the Class are investors who sold all of their shares prior to September 11, 2015, and Defendants, present or former executive officers of Marvell and their immediate family members (as defined in 17 C.F.R. § 229.404, Instructions (1)(a)(iii) and (1)(b)(ii)).

A December 2017 order granted lead plaintiff's motion for preliminary approval of a proposed class settlement. The order also approved, as to form and content, a notice concerning the class settlement agreement and final approval hearing (Dkt. Nos. 57, 138, 202, 222).

The claims administrator sent the class notice to 135 potential class members at addresses obtained from the transfer agent for Marvell and sent notices and cover letters requesting cooperation in forwarding the notices to 4,943 brokerages, custodial banks, and other institutions. The administrator also sent electronic copies of the notice to 409 registered electronic filers qualified to submit electronic claims. In addition, the administrator transmitted the notice over the *Business Wire* and caused it to be published in *The Wall Street Journal* and by the Depository Trust Company on the DTS Legal Notice System.

Following this initial mailing to nominal holders, the claims administrator received 17,230 names and addresses of potential class members to whom it has since sent notices. In addition, 15 institutions requested that the claims administrator send a total of 15,345 notices for the institutions to forward directly to their clients. The administrator sent additional communications to those nominees who failed to provide any class member contacts or confirm that they have none to report.

Based on SEC filings obtained by lead counsel, the claims administrator states that 68 institutional investors represent over 90% of the shares purchased during the class period. The

1 administrator sent notice to each of these 68 investors or to a financial institution known to file
2 claims in securities settlements on behalf of the investor.

3 To date, the claims administrator has mailed 38,513 notices to potential class members and
4 nominees. Of these, 382 could not be delivered. The claims administrator has since obtained
5 updated addresses for 124 of the undeliverable notices.

6 As of April 12, the claims administrator had received 1,363 claims from potential class
7 members, with a number of additional claims expected as the May 7 claims deadline approaches.
8 The administrator received no objections to the proposed class settlement or requested attorney's
9 fees and received only four requests to opt out of the class.

10 This order now considers lead plaintiff's motion for final approval of the proposed class
11 settlement. Lead counsel also move for \$15,950,000 in attorney's fees (comprising 22% of the
12 total settlement fund) and seek reimbursement of \$496,656.65 in litigation expenses. This order
13 follows briefing from lead plaintiff and lead counsel, as well as oral argument at the fairness
14 hearing.

15 ANALYSIS

16 1. FINAL APPROVAL OF PROPOSED CLASS SETTLEMENT.

17 Under FRCP 23(e), court approval is required for any settlement agreement that will bind
18 absent class members. When a proposed settlement agreement is presented, the court must
19 perform two tasks: (1) direct notice in a reasonable manner to all class members who would be
20 bound by the proposal, and (2) approve the settlement only after a hearing and on finding that the
21 terms of the agreement are fair, reasonable, and adequate. FRCP 23(e)(1)–(2).

22 A. Adequacy of Notice.

23 The notice must be “reasonably calculated, under all the circumstances, to apprise
24 interested parties of the pendency of the action and afford them an opportunity to present their
25 objections.” *Mullane v. Central Hanover Bank & Tr. Co.*, 339 U.S. 306, 314 (1950) (citations
26 omitted). It must also describe “the terms of the settlement in sufficient detail to alert those with
27 adverse viewpoints to investigate and to come forward and be heard.” *Mendoza v. Tucson Sch.*
28 *Dist. No. 1*, 623 F.2d 1338, 1352 (9th Cir. 1980). The undersigned judge previously approved the

form, content, and planned distribution of the class notice (Dkt. No. 222). As described above, the claims administrator has fulfilled the notice plan. This order accordingly finds that notice to class members was adequate.

B. Fairness, Reasonableness, and Adequacy of Proposed Settlement.

The instant settlement agreement is fair, reasonable, and adequate. Our court of appeals has set forth various factors that a court must balance when making this determination:

(1) the strength of the plaintiffs' case; (2) the risk, expense, complexity, and likely duration of further litigation; (3) the risk of maintaining class action status throughout the trial; (4) the amount offered in settlement; (5) the extent of discovery completed and the stage of the proceedings; (6) the experience and views of counsel; (7) the presence of a governmental participant; and (8) the reaction of class members to the proposed settlement.

Churchill Village LLC v. Gen. Elec., 361 F.3d 566, 575 (9th Cir. 2004). These factors, however, are not exclusive, and a court must consider whether the settlement "taken as a whole" is fair to absent class members. *Hanlon v. Chrysler Corp.*, 150 F.3d 1011, 1026 (9th Cir. 1998).

The amount of the \$72.5 million settlement is reasonable. Lead plaintiff's damages expert estimated damages at \$296.8 million prior to disaggregation of the dismissed claims. After disaggregation, estimated damages were in the \$150 million range. The recovered settlement is accordingly 24% to 50% of the estimated potential damages in this case.

Prosecuting these claims through trial and subsequent appeals would involve risk, expense, and delay to any potential recovery. At both summary judgment and trial the risks include lead plaintiff's ability to (1) prove scienter and (2) show that Marvell's use of pull-ins gave rise to an actionable claim despite the lack of an accounting restatement and an attestation from the Company's auditor that Marvell's financial statements were GAAP-compliant. The amount that lead plaintiff could recover at trial is also uncertain. Two of the three legal theories originally asserted by lead plaintiff have since been dismissed. Defendants sharply dispute lead plaintiff's ability to prove loss causation and the portion of damages attributable to lead plaintiff's remaining claims. Against these risks, the \$72.5 million settlement fund offers an immediate and certain award for the class.

The parties reached the class settlement after substantial motion practice. Lead plaintiff reviewed over two million pages of documents produced by defendants and third parties. The

1 parties engaged in written discovery and lead plaintiff took 10 depositions and defended three
2 depositions. The stage of the litigation and the extent of discovery conducted indicate that lead
3 plaintiff has enough information and familiarity with the case to make an informed decision.

4 The absence of objections from class members further supports the reasonableness and
5 fairness of the settlement terms. The claims administrator mailed more than 38,000 notices of the
6 proposed settlement and has yet to receive a single objection. Lead plaintiff also supports the
7 settlement.

8 The plan of allocation of settlement proceeds is also fair and reasonable. Class members
9 who submit an acceptable proof of claim will recover settlement funds depending on when during
10 the class period they bought Marvell stock and whether or when they sold their shares. The claims
11 administrator will calculate the claimant's recognized loss from this transactional information and
12 claimants will recover a pro rata share of the settlement fund based on that loss.

13 Accordingly, final approval of the proposed class settlement and plan of allocation is
14 **GRANTED.**

15 **2. MOTION FOR ATTORNEY'S FEES AND EXPENSES.**

16 **A. Attorney's fees.**

17 Lead counsel seek attorney's fees of \$15,950,000 with accrued interest. A district court
18 must ensure that attorney's fees are "fair, adequate, and reasonable," even if the parties have
19 entered into a settlement agreement that provides for those fees. *Staton v. Boeing Co.*, 327 F.3d
20 938, 963–64 (9th Cir. 2003). In determining such fees, "the district court has discretion in
21 common fund cases to choose either the percentage-of-the-fund or the lodestar method." *Vizcaino*
22 *v. Microsoft Corp.*, 290 F.3d 1043, 1047 (9th Cir. 2002).

23 Lead counsel request that attorney's fees be calculated under the percentage-of-the-fund
24 method. Lead counsel ask for \$15,950,000, or 22% of the settlement fund. This is below the 25%
25 benchmark set forth by our court of appeals. *Hanlon*, 150 F.3d at 1029. It is not sufficient,
26 however, to arbitrarily apply a percentage. Rather, the district court must show why the ultimate
27 award is appropriate based on the facts of the case.

1 The undersigned finds application of the lodestar method is appropriate under the
2 circumstances. This permits an examination of lead counsel's lodestar figure and also allows for
3 an adjustment by an appropriate multiplier "reflecting a host of 'reasonableness' factors, including
4 the quality of representation, the benefit obtained for the class, the complexity and novelty of the
5 issues presented, and the risk of nonpayment." *In re Bluetooth Headset Prod. Liab. Litig.*, 654
6 F.3d 935, 941–42 (9th Cir. 2011).

7 Lead counsel spent 13,442.10 hours on this case, resulting in a lodestar of \$6,801,240.50.
8 This order finds that the billing rates for lead counsel, as well as the hours expended on the
9 litigation, are reasonable. Accepting this lodestar figure, the \$15,950,000 requested fee represents
10 a multiplier of 2.34. This multiplier is too high. For the reasons below, a multiplier of 2.0, and a
11 resulting award of \$13,602,481, is appropriate.

12 The adequate settlement award obtained by lead counsel represents between 24% and 50%
13 of lead plaintiff's estimated classwide damages. No summary judgment motion was filed and the
14 case did not go to trial. Nonetheless, since this action began in 2015, lead counsel spent more than
15 13,000 hours litigating the case without compensation and with some risk of no fees. Because
16 counsel worked on a contingent-fee basis despite risks of litigation, this weighs in favor of
17 awarding more than the lodestar. So does the skill required and the quality of work performed by
18 lead counsel in this case. Accordingly, lead counsel's motion for attorney's fees is **GRANTED IN**
19 **PART**. This order awards \$13,602,481 in attorney's fees to lead counsel.

20 **B. Expenses.**

21 Lead counsel also seek to recover from the settlement fund \$496,656.65 in litigation
22 expenses. The largest component of these expenses is the cost of lead counsel's experts and
23 investigators. The second largest component is the cost of transportation, hotels and meals. Lead
24 counsel also seeks reimbursement for, among other things, filing costs, photocopies, transcript
25 services, and online legal and financial research. These expenses were a reasonable and necessary
26 part of the litigation, and are of a type customarily billed to a fee-paying client. No class member
27 objected to recovery of these costs. The motion for reimbursement of these costs is **GRANTED**
28

CONCLUSION

Accordingly, it is hereby ordered as follows:

1. The notice of settlement, as well as the manner in which it was sent to class members, fairly and adequately described the proposed class settlement, the manner in which class members could object to or participate in the settlement, and the manner in which class members could opt out of the class; was the best notice practicable under the circumstances; was valid, due, and sufficient notice to class members; and complied fully with the Federal Rules of Civil Procedure, due process, and all other applicable laws. A full and fair opportunity has been afforded to class members to participate in the proceedings convened to determine whether the proposed class settlement should be given final approval. Accordingly, the undersigned hereby determines that all class members who did not exclude themselves from the settlement by filing a timely request for exclusion are bound by this settlement order.

2. The undersigned also finds that the proposed class settlement is fair, reasonable, and adequate as to the class, lead plaintiff, and defendants; that it is the product of good faith, arms-length negotiations between the parties; and that the settlement is consistent with public policy and fully complies with all applicable provisions of law. The settlement is therefore approved.

3. Having considered lead counsel's motion for attorney's fees and reimbursement of expenses, the undersigned hereby awards lead counsel attorney's fees of \$13,602,481 with interest accrued. Half of this amount shall be paid after the "effective date" as defined in the stipulation of settlement dated December 19, 2017. The other half shall be paid when lead counsel certify that all funds have been properly distributed and the file can be completely closed.

4. Lead counsel shall also receive \$496,656.65 as reimbursement for their litigation expenses, to be paid from the settlement fund.

1 5. By **MAY 11** the parties shall submit a final class list (with names and cities) setting
2 forth the class members bound by the class settlement.

3
4 **IT IS SO ORDERED.**

5
6 Dated: April 20, 2018.



WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE

Exhibit 15

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7
8 **UNITED STATES DISTRICT COURT**
9 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
10 **WESTERN DIVISION**
11

12 IN RE SNAP INC. SECURITIES
13 LITIGATION

Case No. 2:17-cv-03679-SVW-AGR

14 **CLASS ACTION**

15 This Document Relates To: All Actions.
16
17
18
19

**ORDER AWARDING
ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Courtroom: 10A, 10th Floor
Judge: Hon. Stephen V. Wilson

1 This matter is before the Court on Class Counsel's motion for an award of attorneys'
2 fees and Litigation Expenses. The Court having considered all matters submitted to it; and
3 it appearing that notice substantially in the form approved by the Court, which advised of
4 Class Counsel's request for an award of attorneys' fees and Litigation Expenses, was mailed
5 to all Class Members who or which could be identified with reasonable effort, and that a
6 summary notice substantially in the form approved by the Court was published in *The Wall*
7 *Street Journal* and *Investor's Business Daily* and was transmitted over the *PR Newswire*
8 pursuant to the specifications of the Court; and the Court having considered and determined
9 the fairness and reasonableness of the award of attorneys' fees and Litigation Expenses
10 requested,

11 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

12 1. This Order incorporates by reference the definitions in the Stipulation and
13 Agreement of Settlement dated March 20, 2020 ([ECF No. 368-3](#)) ("Stipulation") and all
14 capitalized terms not otherwise defined herein shall have the same meanings as set forth in
15 the Stipulation.

16 2. The Court has jurisdiction to enter this Order and over the subject matter of
17 the Action and all Parties to the Action, including all Class Members.

18 3. Notice of Class Counsel's motion for an award of attorneys' fees and
19 Litigation Expenses was given to all Class Members who or which could be identified with
20 reasonable effort. The form and method of notifying the Class of the motion for an award
21 of attorneys' fees and Litigation Expenses satisfied the requirements of Rule 23 of the
22 Federal Rules of Civil Procedure, the United States Constitution (including the Due Process
23 Clause), the Private Securities Litigation Reform Act of 1995 ([15 U.S.C. §§ 77z-1, 78u-4](#)),
24 as amended, and all other applicable law and rules, constituted the best notice practicable
25 under the circumstances, and constituted due and sufficient notice to all persons and entities
26 entitled thereto.

27 4. Class Counsel is hereby awarded attorneys' fees in the amount of 25% of the
28 Settlement Fund and \$2,290,350.53 in reimbursement of Plaintiffs' Counsel's Litigation

1 Expenses (which fees and expenses shall be paid from the Settlement Fund), which sums
2 the Court finds to be fair and reasonable. Class Counsel shall allocate the attorneys' fees
3 awarded amongst Plaintiffs' Counsel in a manner which it, in good faith, believes reflects
4 the contributions of such counsel to the institution, prosecution, and settlement of the
5 Action.

6 5. In making this award of attorneys' fees and Litigation Expenses from the
7 Settlement Fund, the Court has considered and found that:

8 (a) The Settlement has created a fund of \$154,687,500 in cash that has been
9 funded into escrow pursuant to the terms of the Stipulation, and that numerous Class
10 Members who submit acceptable Claims will benefit from the Settlement that occurred
11 because of the efforts of Plaintiffs' Counsel;

12 (b) The fee sought is based on retainer agreements entered into between
13 Class Representatives and Class Counsel at the outset of Class Representatives'
14 involvement in the Action; and the requested fee has been reviewed and approved as
15 reasonable by Class Representatives, who actively supervised the prosecution and
16 resolution of the Action;

17 (c) More than 824,000 copies of the Postcard Notice and more than 4,600
18 copies of the Notice were mailed to potential Class Members and nominees stating that
19 Class Counsel would apply for attorneys' fees in an amount not to exceed 25% of the
20 Settlement Fund, and reimbursement of Litigation Expenses in an amount not to exceed
21 \$3.25 million, plus interest, which amount may include a request for reimbursement to Class
22 Representatives in an aggregate amount not to exceed \$275,000;

23 (d) Plaintiffs' Counsel conducted the litigation and achieved the Settlement
24 with skill, perseverance, and diligent advocacy;

25 (e) The Action raised a number of complex issues;

26 (f) Had Plaintiffs' Counsel not achieved the Settlement there would remain
27 a significant risk that Class Representatives and the other members of the Class may have
28 recovered less or nothing from the SAC Defendants after trial;

1 (g) Plaintiffs' Counsel devoted over 50,000 hours, with a collective lodestar
2 value of \$22,438,458.15, to achieve the Settlement;

3 (h) The amount of attorneys' fees awarded and Litigation Expenses to be
4 paid from the Settlement Fund are fair and reasonable and consistent with awards in similar
5 cases; and

6 (i) Not a single Class Member has objected to the requested award of
7 attorneys' fees or Litigation Expenses.

8 6. Court-appointed Class Representatives are hereby awarded the following
9 amounts from the Settlement Fund as reimbursement for their reasonable costs and
10 expenses directly related to their representation of the Class: (i) \$36,750.00 to Smilka
11 Melgoza, on behalf of the Smilka Melgoza Trust U/A DTD 04/08/2014; (ii) \$22,800.00 to
12 Rediet Tilahun; (iii) \$5,000.00 to Tony Ray Nelson; \$22,765.00 to Rickey E. Butler;
13 \$7,500.00 to Alan L. Dukes; \$2,500.00 to Donald R. Allen; and \$2,500.00 to Shawn B.
14 Dandridge.

15 7. Any appeal or any challenge affecting this Court's approval regarding any
16 attorneys' fees and Litigation Expenses application shall in no way disturb or affect the
17 finality of the Judgment.

18 8. In the event that the Settlement is terminated or the Effective Date of the
19 Settlement otherwise fails to occur, this Order shall be rendered null and void to the extent
20 provided by the Stipulation.

21 9. There is no just reason for delay in the entry of this Order, and immediate entry
22 by the Clerk of the Court is expressly directed.

23
24 SO ORDERED this 9th day of March, 2021.

25
26 

27 The Honorable Stephen V. Wilson
28 United States District Judge

Exhibit 16

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

IN RE ALLERGAN, INC. PROXY
VIOLATION SECURITIES
LITIGATION

Case No. 8:14-cv-02004-DOC-KESx

CLASS ACTION

**ORDER AWARDING ATTORNEYS’
FEES AND REIMBURSEMENT OF
LITIGATION EXPENSES**

This matter came on for hearing on June 12, 2018 (the “Settlement Hearing”) on Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of Litigation Expenses. The Court having considered all matters submitted to it at the Settlement Hearing and otherwise; and it appearing that notice of the Settlement Hearing substantially in the form approved by the Court was mailed to all Class Members who or which could be identified with reasonable efforts, and that a summary notice of the hearing substantially in the form approved by the Court was published in *The Wall Street Journal*, *The New York Times*, and *The Financial Times* and released via *PR Newswire* pursuant to the specifications of the Court; and the Court having considered and determined the fairness and reasonableness of the award of attorneys’ fees and reimbursement of Litigation Expenses,

1 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

2 1. This Order incorporates by reference the definitions in the Stipulation
3 and Agreement of Settlement dated January 26, 2018 (ECF No. 606) (the
4 “Stipulation”) and all capitalized terms not otherwise defined herein shall have the
5 same meanings as set forth in the Stipulation.

6 2. The Court has jurisdiction to enter this Order and over the subject
7 matter of the Action and all parties to the Action, including all Class Members.

8 3. Notice of Lead Counsel’s motion for an award of attorneys’ fees and
9 reimbursement of Litigation Expenses was given to all Class Members who could
10 be identified with reasonable effort. The form and method of notifying the Class of
11 the motion for an award of attorneys’ fees and reimbursement of Litigation Expenses
12 satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure, the
13 United States Constitution (including the Due Process Clause), the Private Securities
14 Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, as amended, and all other
15 applicable law and rules, constituted the best notice practicable under the
16 circumstances, and constituted due and sufficient notice to all persons and entities
17 entitled thereto.

18 4. Lead Counsel are hereby awarded attorneys’ fees in the amount of 21%
19 of the Settlement Fund, which is equivalent to \$52,500,000 (before interest), and
20 \$6,205,108.12 in reimbursement of Plaintiffs’ Counsel’s litigation expenses (which
21

1 fees and expenses shall be paid from the Settlement Fund), which sums the Court
2 finds to be fair and reasonable. Lead Counsel shall allocate the attorneys' fees
3 awarded amongst Plaintiffs' Counsel in a manner which they, in good faith, believe
4 reflects the contributions of such counsel to the institution, prosecution and
5 settlement of the Action.

6 5. In addition, the law firm of Cotchett, Pitre & McCarthy, LLP is hereby
7 awarded attorneys' fees in the amount of \$84,500 and \$3,357.66 in reimbursement
8 of litigation expenses (which fees and expenses shall be paid from the Settlement
9 Fund) and the law firm of Bottini & Bottini, Inc. is hereby awarded attorneys' fees
10 in the amount of \$161,800 and \$6,306.90 in reimbursement of litigation expenses
11 (which fees and expenses shall be paid from the Settlement Fund), which sums the
12 Court finds to be fair and reasonable.

13 6. In making this award of attorneys' fees and reimbursement of Litigation
14 Expenses to be paid from the Settlement Fund, the Court has considered and found
15 that:

16 (a) The Settlement has created a fund of \$250,000,000 in cash that
17 has been funded into escrow pursuant to the terms of the Stipulation, and that
18 numerous Class Members who submit acceptable Claim Forms will benefit
19 from the Settlement that occurred because of the efforts of Lead Counsel;
20
21

(b) The fee sought by Lead Counsel has been reviewed and approved as reasonable by Class Representatives, including the two institutional investor Lead Plaintiffs, that oversaw the prosecution and resolution of the Action;

(c) Copies of the Settlement Notice were mailed to over 61,700 potential Class Members and nominees stating that Lead Counsel would apply for attorneys' fees in an amount not to exceed 25% of the Settlement Fund and reimbursement of Litigation Expenses in an amount not to exceed \$8.5 million;

(d) There were no objections to the requested attorneys' fees and expenses;

(e) Lead Counsel have conducted the litigation and achieved the Settlement with skill, perseverance and diligent advocacy;

(f) The Action raised a number of complex and novel issues;

(g) Had Lead Counsel not achieved the Settlement there would remain a significant risk that Class Representatives and the other members of the Class may have recovered less or nothing from Defendants;

(h) Plaintiffs' Counsel devoted over 136,000 hours, with a lodestar value of over \$65.2 million, to achieve the Settlement; and

(i) The amount of attorneys' fees awarded and expenses to be reimbursed from the Settlement Fund are fair and reasonable and consistent with awards in similar cases.

7. The Court-approved Administrator, Garden City Group, LLC, shall not be reimbursed for total fees and expenses in excess of \$580,000.00 in connection with this Action without further order of the Court.

8. Class Representative State Teachers Retirement System of Ohio is hereby awarded \$74,839.78 from the Settlement Fund as reimbursement for its reasonable costs and expenses directly related to its representation of the Class.

9. Class Representative Iowa Public Employees Retirement System is hereby awarded \$17,887.20 from the Settlement Fund as reimbursement for its reasonable costs and expenses directly related to its representation of the Class.

10. Class Representative Patrick T. Johnson is hereby awarded \$35,400 from the Settlement Fund as reimbursement for his reasonable costs and expenses directly related to his representation of the Class.

11. Any appeal or any challenge affecting this Court's approval regarding any attorneys' fees and expense application shall in no way disturb or affect the finality of the Judgment.

13. In the event that the Settlement is terminated or the Effective Date of the Settlement otherwise fails to occur, this Order shall be rendered null and void to the extent provided by the Stipulation.

14. There is no just reason for delay in the entry of this Order, and
immediate entry by the Clerk of the Court is expressly directed.

9 SO ORDERED this 14th day of August, 2018.

David O. Carter

The Honorable David O. Carter
United States District Judge

Exhibit 17

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NOTE: CHANGES MADE BY THE COURT

*Attorneys for Co-Lead Plaintiffs
General Retirement System of the City of Detroit
and Massachusetts Laborers' Pension Fund*

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

IN RE INTERNATIONAL
RECTIFIER CORPORATION
SECURITIES LITIGATION

Case No. CV 07-02544-JFW (VBKx)

**ORDER AWARDING
ATTORNEYS' FEES AND
REIMBURSEMENT OF
LITIGATION EXPENSES**

Date: February 8, 2010

Time: 1:30 p.m.

Courtroom: 16

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

2. This Court has jurisdiction over the subject matter of the Consolidated Action and over all parties to the Consolidated Action, including all members of the Class.

4. The objections to the Fee And Expenses Application are overruled.

6. Pursuant to Paragraph 17 of the Stipulation, the attorneys' fees and expenses awarded herein shall be paid to Lead Counsel from the Settlement Fund immediately upon entry of this Order, notwithstanding the existence of any timely filed objections thereto, or potential for appeal therefrom, or collateral attack on the Settlement or any part thereof.

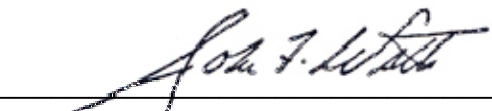
1 7. The Court finds that an award of attorneys' fees of 25% of the net
2 Settlement Fund is consistent with the Ninth Circuit's "benchmark," and is fair and
3 reasonable in light of the following factors, among others: the contingent nature of
4 the case; the quality of the legal services rendered; the benefits derived by the
5 Class; the institutional Lead Plaintiffs' support of the Fee And Expense
6 Application; and the reaction of the Class.

7 8. The Court further finds that the request for reimbursement of litigation
8 expenses is reasonable in light of Lead Counsel's prosecution of this action against
9 the Defendants on behalf of the Class.

10 9. There is no just reason for delay in the entry of this Order, and
11 immediate entry of this Order by the Clerk of the Court is expressly directed.

12 IT IS SO ORDERED.

13
14 DATED: February 8, 2010



THE HONORABLE JOHN F. WALTER
UNITED STATES DISTRICT COURT JUDGE

Exhibit 18

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Additional Counsel for Erie

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**In re: BROCADE SECURITIES
LITIGATION**

Consolidated Case No.: 3:05-CV-02042-CRB

FINAL ORDER AND JUDGMENT

1 WHEREAS, a consolidated class action is pending in this Court captioned: *In re: Brocade*
2 *Securities Litigation*, Consolidated Case No. 3:05-CV-02042-CRB (the “Action”);

3 WHEREAS, the Court previously certified the Class (as defined herein) in this Action by
4 Order dated October 12, 2007, over the opposition of defendants Brocade Communications Systems,
5 Inc. (“Brocade” or the “Company”) and Gregory Reyes, Antonio Canova, Larry Sonsini, Seth
6 Neiman, and Neal Dempsey (collectively, “Individual Defendants”);

7 WHEREAS, on November 18, 2008, the Court preliminarily certified the same Class for
8 purposes of effectuating the settlement among Lead Plaintiff and Class Representative, Arkansas
9 Public Employees Retirement System (“APERS”), and Class Representative, Erie County Public
10 Employees Retirement System (“ERIE”) (together, “Class Representatives”), and KPMG LLP
11 (“KPMG” and, collectively with Brocade and the Individual Defendants, “Defendants”);

12 WHEREAS, pursuant to Federal Rule of Civil Procedure 23(e), this matter came before the
13 Court for hearing pursuant to the Preliminary Approval of Settlement Agreement Order dated
14 November 18, 2008 (the “Notice Order”), on the application of the parties for approval of a
15 proposed settlement of the Action (the “Settlement”) set forth in the following stipulations: (i) a
16 Modified Stipulation and Agreement of Settlement dated January 14, 2009 entered into among Class
17 Representatives, on behalf of themselves and the Class, Brocade and the Individual Defendants (the
18 “Brocade Stipulation”), and (ii) a Stipulation and Agreement of Settlement dated October 23, 2008
19 entered into among Class Representatives, on behalf of themselves and the Class, and KPMG (the
20 “KPMG Stipulation,” and together with the Brocade Stipulation, the “Stipulations”);

21 WHEREAS, due and adequate notice has been given to the Class as required in the Notice
22 Order; and

23 WHEREAS, the Court has considered all papers filed and proceedings had herein and
24 otherwise is fully informed in the premises and good cause appearing therefor;

25 IT IS HEREBY ORDERED, ADJUDGED AND DECREED as follows:
26
27
28

1 1. This Order and Final Judgment (the “Judgment”) incorporates by reference the
2 definitions in the Stipulations and all terms used herein shall have the same meanings as set forth
3 in the Stipulations unless otherwise defined herein.

4 2. This Court has jurisdiction over the subject matter of the Action, and over all parties
5 to the Action (the “Parties”), including all members of the Class.

6 3. The Notice of Class Action, Proposed Settlement, Motion for Attorneys’ Fees and
7 Fairness Hearing (the “Notice”) has been given to the Class, pursuant to and in the manner directed
8 by the Notice Order, proof of the mailing of the Notice and publication of the Publication Notice
9 was filed with the Court by Plaintiffs’ Counsel, and full opportunity to be heard has been offered
10 to all Parties, the Class, and persons and entities in interest. The form and manner of Notice and
11 Publication Notice are hereby determined to have: (a) constituted the best practicable notice, (b)
12 constituted notice that was reasonably calculated, under the circumstances, to apprise Class
13 Members of the pendency of the Action, of the effect of the Stipulations, including the effect of the
14 releases provided for therein, of their right to object to the proposed Settlement, of their right to
15 exclude themselves from the Class, and of their right to appear at the Fairness Hearing, (c)
16 constituted reasonable, due, adequate and sufficient notice to all persons or entities entitled to
17 receive notice, and (d) met all applicable requirements of the Federal Rules of Civil Procedure, the
18 United States Constitution (including the Due Process Clause), 15 U.S.C. § 78u-4(a)(7), the Rules
19 of the Court and all other applicable laws. It is further determined that all members of the Class are
20 bound by the Judgment herein.

21 4. In connection with the certification of the Class, the Court has already determined
22 that each element Federal Rule of Civil Procedure 23(a) and 23(b)(3) was satisfied as to Class
23 Representatives’ claims against Brocade and the Individual Defendants and incorporates that prior
24 order as if set forth fully herein. Additionally, for purposes of effectuating the Settlement, each of
25 the provisions of Fed. R. Civ. P. 23 has been satisfied and the Action has been properly maintained
26 according to the provisions of Rules 23(a) and 23(b)(3) as to Class Representatives’ claims against

1 KPMG. Specifically, this Court finds that: (a) the Class is so numerous that joinder of all members
2 is impracticable; (b) there are questions of law and fact common to the Class; (c) the claims of the
3 Class Representatives are typical of the claims of the Class; (d) Class Representatives and their
4 counsel have fairly and adequately protected the interests of the Class; (e) the questions of law and
5 fact common to members of the Class predominate over any questions affecting only individual
6 members of the Class; and (f) a class action is superior to other available methods for the fair and
7 efficient adjudication of the controversy considering: (i) the interests of the Class Members in
8 individually controlling the prosecution of the separate actions, (ii) the extent and nature of any
9 litigation concerning the controversy already commenced by members of the Class, (iii) the
10 desirability or undesirability of continuing the litigation of the claims asserted in this Action, and
11 (iv) the difficulties likely to be encountered in the management of this Action as a class action.

12 5. Accordingly, the Action is hereby certified as a class action pursuant to Fed. R. Civ.
13 P. 23(a) and 23(b)(3) for purposes of effectuating the Settlement with KPMG on behalf of the same
14 Class previously certified in this Action, which consists of: all persons and entities who purchased
15 or otherwise acquired Brocade common stock between May 18, 2000 and May 15, 2005, inclusive,
16 and who were damaged thereby (the “Class”). Excluded from the Class are: (a) Defendants; (b) all
17 officers, directors, and partners of any Defendant and of any Defendant’s partnerships, subsidiaries,
18 or affiliates at all relevant times; (c) members of the immediate family of any of the foregoing
19 excluded parties; (d) the legal representatives, heirs, successors, and assigns of any of the foregoing
20 excluded parties; and (e) any entity in which any of the foregoing excluded parties has or had a
21 controlling interest at all relevant times. Also excluded from the Class are any putative members
22 of the Class who excluded themselves by timely requesting exclusion in accordance with the
23 requirements set forth in the Notice, as listed on Exhibit 1 annexed hereto.

24 6. The Settlement, and all transactions preparatory or incident thereto, is found to be
25 fair, reasonable, adequate, and in the best interests of the Class, and is hereby approved. The
26 Parties are hereby authorized and directed to comply with and to consummate the Settlement in

1 accordance with the Stipulations, and the Clerk of this Court is directed to enter and docket this
2 Judgment in the Action.

3 7. The Action and all claims included therein, as well as all of the Settled Claims
4 (defined in the Stipulations and in Paragraph 8(c) below) are dismissed with prejudice as to Class
5 Representatives and all other members of the Class, and as against each and all of the Released
6 Parties (defined in the Stipulations and in Paragraph 8(a) below). The Parties are to bear their own
7 costs, except as otherwise provided in the Stipulations.

8 8. As used in this Judgment, the terms “Released Parties,” “Related Parties,” “Settled
9 Claims,” “Settled Defendants’ Claims,” and “Unknown Claims” shall have the meanings set forth
10 below:

11 (a) “Released Parties” means Defendants and, as applicable, each of their Related Parties
12 as defined below.

13 (b) “Related Parties” means each of Defendants’ past or present directors, officers,
14 employees, partners, principals, members, insurers, co-insurers, re-insurers, controlling shareholders,
15 attorneys, advisors, accountants, auditors, personal or legal representatives, predecessors, successors,
16 parents, subsidiaries, divisions, joint ventures, assigns, spouses, heirs, related or affiliated entities,
17 any entity in which a Defendant has a controlling interest, any member of any Individual
18 Defendant’s immediate family, or any trust of which any Individual Defendant is the settlor or which
19 is for the benefit of any member of an Individual Defendant’s immediate family.

20 (c) “Settled Claims” means and includes any and all claims, debts, demands,
21 controversies, obligations, losses, rights or causes of action or liabilities of any kind or nature
22 whatsoever (including, but not limited to, any claims for damages (whether compensatory, special,
23 incidental, consequential, punitive, exemplary or otherwise), injunctive relief, declaratory relief,
24 rescission or rescissionary damages, interest, attorneys’ fees, expert or consulting fees, costs,
25 expenses, or any other form of legal or equitable relief whatsoever), whether based on federal, state,
26 local, statutory or common law or any other law, rule or regulation, whether fixed or contingent,

1 accrued or un-accrued, liquidated or unliquidated, at law or in equity, matured or unmatured,
 2 whether class or individual in nature, including both known claims and Unknown Claims (defined
 3 herein) that: (i) have been asserted in this Action by Class Representatives on behalf of the Class
 4 and its Class Members against any of the Released Parties, or (ii) have been or could have been
 5 asserted in any forum by Class Representatives, Class Members or any of them against any of the
 6 Released Parties, which arise out of, relate to or are based upon the allegations, transactions, facts,
 7 matters, occurrences, representations or omissions involved, set forth, or referred to in the Complaint
 8 and/or the Amended Complaint. Settled Claims shall also include any claims, debts, demands,
 9 controversies, obligations, losses, rights or causes of action that Class Representatives, Class
 10 Members or any of them may have against the Released Parties or any of them which involve or
 11 relate in any way to the defense of the Action or the Settlement of the Action. Notwithstanding the
 12 foregoing, Settled Claims shall not include: (i) any claims to enforce the Settlement, including,
 13 without limitation, any of the terms of the Stipulations, the Notice Order, this Judgment or any other
 14 orders issued by the Court in connection with the Settlement; (ii) any claims asserted by Persons
 15 who exclude themselves from the Class by timely requesting exclusion in accordance with the
 16 requirements set forth in the Notice; (iii) any claims, rights or causes of action that have been or
 17 could have been asserted in the Derivative Actions and/or the Company Action (as defined in the
 18 Brocade Stipulation); or (iv) any and all claims that have been asserted under the Securities Act of
 19 1933 and the Securities Exchange Act of 1934, or any other laws, for the allegedly wrongful conduct
 20 complained of in *In re Brocade Communications Systems, Inc. Initial Public Offering Securities*
 21 *Litigation*, 01 CV 6613 (SAS)(BSJ), as coordinated for pretrial purposes in *In re Initial Public*
 22 *Offering Securities Litigation*, Master File No. 21 MC 92 (SAS), pending in the United States
 23 District Court for the Southern District of New York.

24 (d) “Settled Defendants’ Claims” means and includes any and all claims, debts, demands,
 25 controversies, obligations, losses, costs, rights or causes of action or liabilities of any kind or nature
 26 whatsoever (including, but not limited to, any claims for damages (whether compensatory, special,
 27

incidental, consequential, punitive, exemplary or otherwise), injunctive relief, declaratory relief, rescission or rescissionary damages, interest, attorneys' fees, expert or consulting fees, costs, expenses, or any other form of legal or equitable relief whatsoever), whether based on federal, state, local, statutory or common law or any other law, rule or regulation, whether fixed or contingent, accrued or unaccrued, liquidated or unliquidated, at law or in equity, matured or unmatured, including both known claims and Unknown Claims, that have been or could have been asserted in the Action or any forum by the Released Parties against any of the Class Representatives, Plaintiffs' Counsel, Class Members or their attorneys, which arise out of or relate in any way to the institution, prosecution, or settlement of the Action. Notwithstanding the foregoing, Settled Defendants' Claims shall not include any claims to enforce the Settlement, including, without limitation, any of the terms of the Stipulations, the Notice Order, this Judgment or any other orders issued by the Court in connection with the Settlement .

(e) "Unknown Claims" means any and all claims that any Class Representative or Class Member does not know or suspect to exist and any and all claims that any Defendant does not know or suspect to exist in his, her or its favor at the time of the release of the Released Parties which, if known by him, her or it, might have affected his, her or its settlement with and release of, as applicable, the Released Parties, Class Representatives, and Class Members, or might have affected his, her or its decision to object or not to object to this Settlement. The Class Representatives, Class Members, Defendants and each of them have acknowledged and agreed that he, she or it may hereafter discover facts in addition to or different from those which he, she or it now knows or believes to be true with respect to the subject matter of the Settled Claims and/or the Settled Defendants' Claims. Nevertheless, with respect to any and all Settled Claims and Settled Defendants' Claims, the Parties to the Stipulations have stipulated and agreed that, upon the Effective Date, they shall expressly waive and each of the Class Members shall be deemed to have, and by operation of the Judgment shall have, waived all provisions, rights and benefits of California Civil Code § 1542 and all provisions rights and benefits conferred by any law of any state or

territory of the United States, or principle of common law, which is similar, comparable or equivalent to California Civil Code § 1542. California Civil Code § 1542 provides:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS WHICH THE CREDITOR DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE, WHICH IF KNOWN BY HIM OR HER MUST HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR.

The Parties to the Stipulations have expressly acknowledged and agreed, and the Class Members shall be deemed to have, and by operation of the Judgment shall have acknowledged and agreed, that the waiver and release of Unknown Claims constituting Settled Claims and/or Settled Defendants' Claims was separately bargained for and a material element of the Settlement.

9. (a) In accordance with 15 U.S.C. § 78u-4(f)(7)(A), any and all claims for contribution arising out of any Settled Claim (i) by any person against Brocade or the Individual Defendants, and (ii) by Brocade or the Individual Defendants against any person, other than claims for contribution that Brocade and/or the Special Litigation Committee (as defined in the Brocade Stipulation) have asserted or may assert against the Individual Defendants, the Related Parties or any of them, are hereby permanently barred and discharged. In accordance with 15 U.S.C. § 78u-4(f)(7)(A), any and all claims for contribution arising out of any Settled Claim (i) by any person against KPMG, and (ii) by KPMG against any person, other than a person whose liability has been extinguished by the KPMG Settlement, are hereby permanently barred and discharged. This paragraph 9(a) shall be referred to herein as the "Bar Order."

(b) Notwithstanding the Bar Order or any other provision or paragraph in this Judgment or 15 U.S.C. § 78u-4(f)(7)(A) to the contrary, the Individual Defendants have acknowledged and agreed, and the Court finds, that the Individual Defendants are "person[s] whose liability has been extinguished" by the Brocade Stipulation within the meaning of 15 U.S.C. § 78u-4(f)(7)(A)(ii). Further, the Court finds that the Individual Defendants have knowingly and expressly waived the right to assert the Bar Order or 15 U.S.C. § 78u-4(f)(7)(A) as a defense to any claims for contribution that Brocade and/or the Special Litigation Committee have asserted

1 or may assert against them in connection with the defense and Settlement of the Action or any
2 related litigation arising from the transactions and occurrences that form the basis of the Action;
3 provided, however, that the Individual Defendants and their Related Parties, and each of them,
4 shall retain the right to defend against any such claims for contribution on other grounds,
5 including, without limitation: (i) that he or she is not at fault for the conduct giving rise to the
6 Settlement; (ii) that his or her proportional fault is less than asserted by Brocade and/or the Special
7 Litigation Committee; (iii) that Brocade is legally and/or contractually obligated to indemnify him
8 or her for some or all of the Settlement Amount and/or that he or she is not required to reimburse
9 or repay Brocade for that indemnified amount; and (iv) that the Settlement Amount is greater than
10 warranted under all of the circumstances. Further, Brocade and the Special Litigation Committee
11 have agreed that they will not argue or otherwise assert in any forum or proceeding that (i) by
12 entering into the Brocade Stipulation the Individual Defendants acquiesced in the Settlement
13 Amount or waived in any way their arguments challenging the Settlement Amount as excessive,
14 and (ii) the Bar Order in any way affects or impairs the existing rights of the Individual Defendants
15 to obtain indemnification and advancement of fees incurred in connection with Settled Claims or
16 any other claim asserted against them. The Individual Defendants have agreed that they will not
17 argue or otherwise assert in any forum or proceeding that, by entering into the Brocade
18 Stipulation, Brocade or the Special Litigation Committee in any way compromised or otherwise
19 affected its/their right to seek to limit or extinguish any purported obligation to indemnify or
20 advance fees to the Individual Defendants and their Related Parties or to seek to recover any of
21 the fees or expenses that Brocade has advanced or may advance on behalf of or for the benefit of
22 the Individual Defendants and/or their Related Parties.

23 10. Upon the Effective Date, Class Representatives and all Class Members on behalf
24 of themselves, their personal representatives, heirs, executors, administrators, trustees, successors
25 and assigns: (a) shall have fully, finally and forever released, relinquished and discharged each and
26 every one of the Settled Claims against the Released Parties, whether or not any such Class Member

1 or Class Representative executes or delivers a Proof of Claim and Release form (“Proof of Claim”);
2 and (b) shall be deemed to have covenanted not to sue on, and shall forever be barred from suing
3 on, instituting, prosecuting, continuing, maintaining or asserting in any forum, either directly or
4 indirectly, on their own behalf or on behalf of any class or other person, any Settled Claim against
5 any of the Released Parties.

6 11. Upon the Effective Date, each of the Defendants, on behalf of themselves and their
7 Related Parties: (a) shall have fully, finally and forever released, relinquished and discharged each
8 and every one of the Settled Defendants’ Claims; and (b) shall be deemed to have covenanted not
9 to sue on, and shall forever be barred from suing on, instituting, prosecuting, continuing, maintaining
10 or asserting in any forum, either directly or indirectly, on their own behalf or on behalf of any class
11 or other person, any Settled Defendants’ Claim against Class Representatives, Class Members and
12 their respective counsel, or any of them.

13 12. Notwithstanding ¶¶ 9-11 herein, nothing in this Judgment shall bar any action or
14 claim by any of the Parties or the Released Parties to enforce or effectuate the terms of the
15 Stipulations or this Judgment.

16 13. This Judgment and the Stipulations, including any provisions contained in the
17 Stipulations, any negotiations, statements, or proceedings in connection therewith, or any action
18 undertaken pursuant thereto:

19 (a) shall not be offered or received against any Released Party as evidence of or
20 construed as or deemed to be evidence of any presumption, concession, or admission by the
21 Released Parties with respect to the truth of any fact alleged by any of the plaintiffs or the validity
22 of any claim that has been or could have been asserted in the Action or in any litigation, or the
23 deficiency of any defense that has been or could have been asserted in the Action or in any litigation,
24 or of any liability, negligence, fault, or wrongdoing of any Released Party;

25 (b) shall not be offered or received against any Released Party as evidence of a
26 presumption, concession or admission of any fault, misrepresentation or omission with respect to
27

1 any statement or written document approved or made by any Released Party;

2 (c) shall not be offered or received against any Released Party as evidence of a
3 presumption, concession or admission with respect to any liability, negligence, fault or wrongdoing
4 in any civil, criminal or administrative action or proceeding, other than such proceedings as may be
5 necessary to effectuate the provisions of the Stipulations; provided, however, that the Released
6 Parties may offer or refer to the Stipulations to effectuate the terms of the Stipulations, including the
7 releases and other liability protection granted them hereunder, and may file the Stipulations and/or
8 this Judgment in any action that may be brought against them (other than one that has been or may
9 be brought by Brocade and/or the Special Litigation Committee) in order to support a defense or
10 counterclaim based on principles of res judicata, collateral estoppel, full faith and credit, release,
11 good faith settlement, judgment bar or reduction or any other theory of claim preclusion or issue
12 preclusion or similar defense or counterclaim;

13 (d) shall not be construed against any Released Party as an admission or concession that
14 the consideration to be given hereunder represents the amount that could be or would have been
15 recovered after trial; and

16 (e) shall not be construed as or received in evidence as an admission, concession or
17 presumption against the Class Representatives or any of the Class Members that any of their claims
18 are without merit, or that any defenses asserted by Defendants have any merit, or that damages
19 recoverable under the Action would not have exceeded the Settlement Amount.

20 14. The Plan of Allocation is approved as fair and reasonable, and Plaintiffs' Counsel
21 and the Claims Administrator are directed to administer the Settlement in accordance with the terms
22 and provisions of the Stipulations.

23 15. The Court finds that all Parties and their counsel have complied with each
24 requirement of the PSLRA and Rules 11 and 37 of the Federal Rules of Civil Procedure as to all
25 proceedings herein and that Class Representatives and Plaintiffs' Counsel at all times acted in the
26 best interests of the Class and had a good faith basis to bring, maintain and prosecute this Action as

1 to each Defendant in accordance with the PSLRA and Federal Rule of Civil Procedure 11.

2 16. Only those Class Members who submit valid and timely Proofs of Claim shall be
3 entitled to receive a distribution from the Net Settlement Fund. The Proof of Claim to be executed
4 by the Class Members shall further release all Settled Claims against the Released Parties. All Class
5 Members shall be bound by all of the terms of the Stipulations and this Judgment, including the
6 releases set forth herein, whether or not they submit a valid and timely Proof of Claim, and shall be
7 barred from bringing any action against any of the Released Parties concerning the Settled Claims.

8 17. No Class Member shall have any claim against Plaintiffs' Counsel, the Claims
9 Administrator, or other agent designated by Plaintiffs' Counsel based on the distributions made
10 substantially in accordance with the Settlement and Plan of Allocation as approved by the Court and
11 further orders of the Court.

12 18. No Class Member shall have any claim against the Defendants, Defendants' counsel,
13 or any of the Released Parties with respect to: (a) any act, omission or determination of Plaintiffs'
14 Counsel, the Escrow Agent or the Claims Administrator, or any of their respective designees or
15 agents, in connection with the administration of the Settlement or otherwise; (b) the management,
16 investment or distribution of the Gross Settlement Fund and/or the Net Settlement Fund; (c) the Plan
17 of Allocation; (d) the determination, administration, calculation or payment of claims asserted
18 against the Gross Settlement Fund and/or the Net Settlement Fund; (e) the administration of the
19 Escrow Account; (f) any losses suffered by, or fluctuations in the value of, the Gross Settlement
20 Fund and/or the Net Settlement Fund; or (g) the payment or withholding of any Taxes, expenses
21 and/or costs incurred in connection with the taxation of the Gross Settlement Fund and/or the Net
22 Settlement Fund or the filing of any tax returns.

23 19. Any order approving or modifying the Plan of Allocation set forth in the Notice, or
24 the application by Plaintiffs' Counsel for an award of attorneys' fees and reimbursement of expenses
25 or any request of Class Representatives for reimbursement of reasonable costs and expenses shall
26 not disturb or affect the Finality of this Judgment, the Stipulations or the Settlement contained

1 therein.

2 20. Plaintiffs' Counsel are hereby awarded a total of \$986,039 in reimbursement of
3 expenses, plus accrued interest. After deducting such expenses from the Gross Settlement Fund,
4 Plaintiffs' Counsel also are hereby awarded attorneys' fees in the amount of 25% of the Gross
5 Settlement Fund (net of any reimbursed expenses), plus accrued interest, which sum the Court finds
6 to be fair and reasonable. The foregoing awards of fees and expenses shall be paid to Plaintiffs'
7 Counsel from the Gross Settlement Fund, and such payment shall be made at the time and in the
8 manner provided in the Stipulations, with interest from the date the Gross Settlement Fund was
9 funded to the date of payment at the same net rate that interest is earned by the Gross Settlement
10 Fund. The appointment and distribution among Plaintiffs' Counsel of any award of attorneys' fees
11 shall be within Plaintiffs' Counsel's sole discretion.

12 21. In making this award of attorneys' fees and reimbursement of expenses to be paid
13 from the Gross Settlement Fund, the Court has considered and found that:

14 (a) the Settlement has created a fund of \$160,098,500 million in cash that is
15 already on deposit, plus interest thereon, and that numerous Class Members who submit acceptable
16 Proofs of Claim will benefit from the Settlement;

17 (b) Over 500,000 copies of the Notice were disseminated to putative Class
18 Members stating that Plaintiffs' Counsel were moving for attorneys' fees not to exceed 25% of the
19 Gross Settlement Fund and reimbursement of expenses from the Gross Settlement Fund in a total
20 amount not to exceed \$1.2 million, and no objections were filed by any Class Member against the
21 terms of the proposed Settlement or the ceiling on the fees and expenses contained in the Notice;

22 (c) Plaintiffs' Counsel have conducted the litigation and achieved the Settlement
23 in good faith and with skill, perseverance and diligent advocacy;

24 (d) The Action involves complex factual and legal issues and was actively
25 prosecuted for over three years and, in the absence of a settlement, would involve further lengthy
26 proceedings with uncertain resolution of the complex factual and legal issues;

1 (e) Had Plaintiffs' Counsel not achieved the Settlement there would remain a
2 significant risk that the Class Representatives and the Class may have recovered less or nothing from
3 the Defendants;

4 (f) Plaintiffs' Counsel have advanced in excess of the requested \$986,039 in
5 costs and expenses to fund the litigation of this Action; and

6 (g) The amount of attorneys' fees awarded and expenses reimbursed from the
7 Gross Settlement Fund are fair and reasonable under all of the circumstances and consistent with
8 awards in similar cases.

9 22. No Class Member filed an objection to the terms of the settlement or the fee
10 application. Two objections were filed by former defendants who are not Class Members. Those
11 objections have been withdrawn and are no longer before the Court. All other objections, if any, are
12 hereby denied.

13 23. Without affecting the Finality of this Judgment in any way, the Court reserves
14 exclusive and continuing jurisdiction over the Action, the Class Representatives, the Class, and the
15 Released Parties for purposes of: (a) supervising the implementation, enforcement, construction, and
16 interpretation of the Stipulations, the Plan of Allocation, and this Judgment; (b) hearing and
17 determining any application by Plaintiffs' Counsel for an award of attorneys' fees, costs, and
18 expenses and/or reimbursement to the Class Representatives, if such determinations were not made
19 at the Fairness Hearing; and (c) supervising the distribution of the Gross Settlement Fund and/or the
20 Net Settlement Fund.

21 24. In the event that the Settlement is terminated or does not become Final in
22 accordance with the terms of the Stipulations for any reason whatsoever, or in the event that the
23 Gross Settlement Fund, or any portion thereof, is returned to Brocade or KPMG, then this Judgment
24 shall be rendered null and void and shall be vacated to the extent provided by and in accordance with
25 the Stipulations and, in such event, all orders entered and releases delivered in connection herewith
26 shall be null and void to the extent provided by and in accordance with the Stipulations.

1 25. In the event that, prior to the Effective Date, Class Representatives or Brocade
2 institutes any legal action against the other to enforce any provision of the Brocade Stipulation or
3 this Judgment or to declare rights or obligations thereunder, the successful Party or Parties shall be
4 entitled to recover from the unsuccessful Party or Parties reasonable attorneys' fees and costs
5 incurred in connection with any such action. Neither KPMG nor the Individual Defendants shall
6 have any obligation under this paragraph.

7 26. There is no reason for delay in the entry of this Judgment and immediate entry by
8 the Clerk of the Court is expressly directed pursuant to Rule 54(b) of the Federal Rules of Civil
9 Procedure.

10 SIGNED January 26, 2009.



11 **THE HONORABLE CHARLES R. BREYER**
12 **UNITED STATES DISTRICT JUDGE**

Exhibit 19

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: SUNEDISON, INC. SECURITIES
LITIGATION

Civil Action No. 1:16-md-2742-PKC

This Document Relates To:

Horowitz et al. v. SunEdison, Inc. et al.,
Case No. 1:16-cv-07917-PKC

~~PROPOSED~~ **ORDER AWARDING
ATTORNEYS' FEES AND LITIGATION EXPENSES**

This matter came on for hearing on October 25, 2019 (the “Settlement Hearing”) on Lead Counsel’s motion for an award of attorneys’ fees and litigation expenses in the above-captioned class action (the “Action”). The Court having considered all matters submitted to it at the Settlement Hearing and otherwise; and it appearing that notice of the Settlement Hearing substantially in the form approved by the Court was mailed to all Class Members who or which could be identified with reasonable effort, and that a summary notice of the hearing substantially in the form approved by the Court was published in the *Wall Street Journal* and was transmitted over the *PR Newswire* pursuant to the specifications of the Court; and the Court having considered and determined the fairness and reasonableness of the award of attorneys’ fees and litigation expenses requested,

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. This Order incorporates by reference the definitions in the Stipulation and Agreement of Settlement dated July 11, 2019 (the “Stipulation”) and all capitalized terms not otherwise defined herein shall have the same meanings as set forth in the Stipulation.
2. The Court has jurisdiction to enter this Order and over the subject matter of the Action and all parties to the Action, including all Class Members.
3. Notice of Lead Counsel’s motion for an award of attorneys’ fees and litigation expenses was given to all Class Members who could be identified with reasonable effort. The form

and method of notifying the Class of the motion for an award of attorneys' fees and litigation expenses satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure, the United States Constitution (including the Due Process Clause), the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §§ 77z-1, 78u-4, as amended, and all other applicable law and rules, constituted the best notice practicable under the circumstances, and constituted due, adequate, and sufficient notice to all persons and entities entitled thereto.

4. Plaintiffs' Counsel are hereby awarded attorneys' fees in the amount of 21% of the Settlement Fund and \$1,525,355.53 in payment of Plaintiffs' Counsel's litigation expenses (which fees and expenses shall be paid from the Settlement Fund), which sums the Court finds to be fair and reasonable. Lead Counsel shall allocate the attorneys' fees awarded amongst Plaintiffs' Counsel in a manner which it, in good faith, believes reflects the contributions of such counsel to the institution, prosecution, and settlement of the Action.

5. In making this award of attorneys' fees and payment of expenses to be paid from the Settlement Fund, the Court has considered and found that:

(a) The Settlement has created a fund of \$74,000,000 in cash that has been funded into escrow pursuant to the terms of the Stipulation, plus an additional, potential supplemental payment of up to \$2,000,000, and that numerous Class Members who submit acceptable Claim Forms will benefit from the Settlement that occurred because of the efforts of Plaintiffs' Counsel;

(b) The fee sought falls within the terms authorized under a written fee agreement entered into between Lead Plaintiff, a sophisticated institutional investor that actively supervised the Action, and Lead Counsel at the outset of the Action, and the requested fee has been reviewed and approved as reasonable by Plaintiffs;

(c) Copies of the Settlement Notice were mailed to over 287,000 potential Class Members and nominees stating that Lead Counsel would apply for attorneys' fees in an amount not exceed 22% of the Settlement Fund and for litigation expenses in an amount not to exceed \$2,000,000, and no objections to the requested attorneys' fees and expenses were received;

(d) Plaintiffs' Counsel conducted the litigation and achieved the Settlement with skill, perseverance, and diligent advocacy;

(e) The Action raised a number of complex issues;

(f) Had Plaintiffs' Counsel not achieved the Settlement there would remain a significant risk that Plaintiffs and the other members of the Class may have recovered less or nothing from Defendants;

(g) Plaintiffs' Counsel devoted over 38,000 hours, with a lodestar value of approximately \$18,082,000, to achieve the Settlement; and

(h) The amount of attorneys' fees awarded and expenses to be paid from the Settlement Fund are fair and reasonable and consistent with awards in similar cases.

6. Lead Plaintiff Municipal Employees' Retirement System of Michigan is hereby awarded \$13,598.65 from the Settlement Fund as reimbursement for its reasonable costs and expenses directly related to its representation of the Class.

7. Named Plaintiff Arkansas Teacher Retirement System is hereby awarded \$1,819.50 from the Settlement Fund as reimbursement for its reasonable costs and expenses directly related to its representation of the Class.

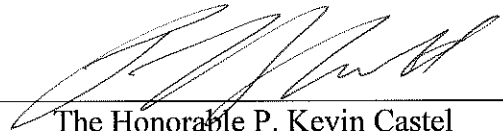
8. Any appeal or any challenge affecting this Court's approval regarding any attorneys' fees and expense application shall in no way disturb or affect the finality of the Judgment.

9. Exclusive jurisdiction is hereby retained over the parties and the Class Members for all matters relating to this Action, including the administration, interpretation, effectuation, or enforcement of the Stipulation and this Order.

10. In the event that the Settlement is terminated or the Effective Date of the Settlement otherwise fails to occur, this Order shall be rendered null and void to the extent provided by the Stipulation.

11. There is no just reason for delay in the entry of this Order, and immediate entry by the Clerk of the Court is expressly directed.

SO ORDERED this 25th day of October, 2019.



The Honorable P. Kevin Castel
United States District Judge

Exhibit 20

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAN ANTONIO FIRE AND POLICE
PENSION FUND, FIRE AND POLICE
HEALTH CARE FUND, SAN ANTONIO,
PROXIMA CAPITAL MASTER FUND LTD.,
and THE ARBITRAGE FUND,

Civil Action No. 1:15-cv-1140-LPS

Plaintiffs,

v.

DOLE FOOD COMPANY, INC., DAVID H.
MURDOCK and C. MICHAEL CARTER,

Defendants.

**[PROPOSED] ORDER AWARDING ATTORNEYS' FEES
AND REIMBURSEMENT OF LITIGATION EXPENSES**

This matter came on for hearing on July 18, 2017 (the "Settlement Hearing") on Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses. The Court having considered all matters submitted to it at the Settlement Hearing and otherwise; and it appearing that notice of the Settlement Hearing substantially in the form approved by the Court was mailed to all Settlement Class Members who or which could be identified with reasonable effort, and that a summary notice of the hearing substantially in the form approved by the Court was published in *The Wall Street Journal* and was transmitted over the *PR Newswire* pursuant to the specifications of the Court; and the Court having considered and determined the fairness and reasonableness of the award of attorneys' fees and Litigation Expenses requested,

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. This Order incorporates by reference the definitions in the Amended Stipulation and Agreement of Settlement dated March 29, 2017 (D.I. 88-1) (the "Stipulation") and all capitalized terms not otherwise defined herein shall have the same meanings as set forth in the Stipulation.

2. The Court has jurisdiction to enter this Order and over the subject matter of the Action and all parties to the Action, including all Settlement Class Members.

3. Notice of Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses was given to all Settlement Class Members who could be identified with reasonable effort. The form and method of notifying the Settlement Class of the motion for an award of attorneys' fees and expenses satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure, the Private Securities Litigation Reform Act of 1995 (15 U.S.C. § 78u-4(a)(7)), due process, and all other applicable law and rules, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled thereto.

4. Plaintiffs' Counsel are hereby awarded attorneys' fees in the amount of 25% of the Settlement Fund and \$638,890.06 in reimbursement of Plaintiffs' Counsel's litigation expenses (which fees and expenses shall be paid from the Settlement Fund), which sums the Court finds to be fair and reasonable. Lead Counsel shall allocate the attorneys' fees awarded amongst Plaintiffs' Counsel in a manner which they, in good faith, believe reflects the contributions of such counsel to the institution, prosecution and settlement of the Action.

5. In making this award of attorneys' fees and reimbursement of expenses to be paid from the Settlement Fund, the Court has considered and found that:

(a) The Settlement has created a fund of \$74,000,000 in cash that has been funded into escrow pursuant to the terms of the Stipulation, and that numerous Settlement Class Members who submit acceptable Claim Forms will benefit from the Settlement that occurred because of the efforts of Lead Counsel;

(b) The fee sought by Lead Counsel has been reviewed and approved as reasonable by Lead Plaintiffs, institutional investors that oversaw the prosecution and resolution of the Action;

(c) Copies of the Notice were mailed to over 28,000 potential Settlement Class Members and nominees stating that Lead Counsel would apply for attorneys' fees in an amount not exceed 25% of the Settlement Fund and reimbursement of Litigation Expenses in an amount not to exceed \$1,300,000, and no objections to the requested attorneys' fees and expenses were received;

(d) Lead Counsel conducted the litigation and achieved the Settlement with skill, perseverance and diligent advocacy;

(e) The Action raised a number of complex issues;

(f) Had Lead Counsel not achieved the Settlement there would remain a significant risk that Lead Plaintiffs and the other members of the Settlement Class may have recovered less or nothing from Defendants;

(g) Plaintiffs' Counsel devoted over 16,000 hours, with a lodestar value of approximately \$8,530,000, to achieve the Settlement; and

(h) The amount of attorneys' fees awarded and expenses to be reimbursed from the Settlement Fund are fair and reasonable and consistent with awards in similar cases.

6. Lead Plaintiff Proxima Capital Master Fund Ltd. is hereby awarded \$18,500.00 from the Settlement Fund as reimbursement for its reasonable costs and expenses directly related to its representation of the Settlement Class.

7. Lead Plaintiff San Antonio Fire and Police Pension Fund is hereby awarded \$4,058.70 from the Settlement Fund as reimbursement for its reasonable costs and expenses directly

related to its representation of the Settlement Class.

8. Lead Plaintiff The Arbitrage Fund is hereby awarded \$32,437.50 from the Settlement Fund as reimbursement for its reasonable costs and expenses directly related to its representation of the Settlement Class.

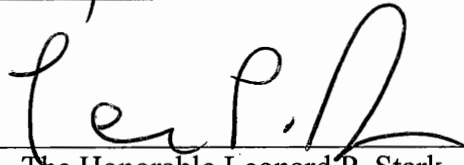
9. Any appeal or any challenge affecting this Court's approval regarding any attorneys' fees and expense application shall in no way disturb or affect the finality of the Judgment.

10. Exclusive jurisdiction is hereby retained over the parties and the Settlement Class Members for all matters relating to this Action, including the administration, interpretation, effectuation or enforcement of the Stipulation and this Order.

11. In the event that the Settlement is terminated or the Effective Date of the Settlement otherwise fails to occur, this Order shall be rendered null and void to the extent provided by the Stipulation.

12. There is no just reason for delay in the entry of this Order, and immediate entry by the Clerk of the Court is expressly directed.

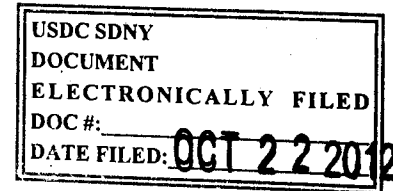
SO ORDERED this 18th day of July, 2017.



The Honorable Leonard P. Stark
Chief United States District Judge

Exhibit 21

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



----- X
LARRY FREUDENBERG, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

- against -

E*TRADE FINANCIAL CORPORATION,
MITCHELL H. CAPLAN, ROBERT J.
SIMMONS and DENNIS E. WEBB,

Defendants.
----- X

Civil Action No.

07 Civ. 8538 (JPO) (MHD)

FINAL JUDGMENT AND ORDER OF DISMISSAL

This matter came before the Court for hearing pursuant to this Court's Order Granting Preliminary Approval of Settlement, Granting Conditional Class Certification, and Providing for Notice dated June 12, 2012 ("Preliminary Approval Order"), and the Court having received declarations attesting to the mailing of the Notice and the publication of the Summary Notice in accordance with the Preliminary Approval Order, on the application of the Settling Parties for approval of the settlement ("Settlement") set forth in the Stipulation of Settlement dated as of May 17, 2012 ("Stipulation"), the proposed Plan of Allocation of the Settlement proceeds, Plaintiffs' Counsel's application for an award of attorneys' fees and reimbursement of litigation expenses, and interim reimbursement of notice and administration expenses and, following a hearing on October 11, 2012 before this Court to consider the applications, all supporting papers and arguments of the Settling Parties, the objections, supporting papers and arguments submitted by Paul Liles, Leon Behar, Chris Andrews, and Eldon Ventris, and other proceedings held herein, and good cause appearing therefore,

IT IS HEREBY ADJUDGED, DECREED AND ORDERED:

1. This Final Judgment incorporates by reference the definitions in the Stipulation, and all terms used herein shall have the same meanings as set forth in the Stipulation unless set forth differently herein. The terms of the Stipulation are fully incorporated in this Final Judgment as if set forth fully herein.

2. The Court has jurisdiction over the subject matter of this Action and all parties to the Action, including all Settlement Class Members.

3. This Court finds that due and adequate notice was given of the Settlement, the Plan of Allocation of the Settlement proceeds, and Plaintiffs' Counsel's application for an award of attorneys' fees and/or reimbursement of expenses, as directed by this Court's Preliminary Approval Order, and that the forms and methods for providing such notice to Settlement Class Members:

(a) constituted the best notice practicable under the circumstances, including individual notice to all Settlement Class Members who could be identified through reasonable effort;

(b) was reasonably calculated, under the circumstances, to apprise Settlement Class Members of: (i) the proposed Settlement of this class action and the right to exclude themselves from the Settlement Class; (ii) their right to object to any aspect of the proposed Settlement, including the terms of the Stipulation and the Plan of Allocation; (iii) their right to appear at the Settlement Hearing, either on their own or through counsel hired at their own expense, if they are not excluded from the Settlement Class; and (iv) the binding effect of the proceedings, rulings, orders and judgments in this

Action, whether favorable or unfavorable, on all persons who are not excluded from the Settlement Class;

(c) was reasonable and constituted due, adequate, and sufficient notice to all persons entitled to be provided with notice; and

(d) fully satisfied all the applicable requirements of Rule 23 of the Federal Rules of Civil Procedure, due process, and all other applicable laws.

4. Pursuant to Rules 23(a) and 23(b)(3) of the Federal Rules of Civil Procedure, the Court hereby grants final certification of the Settlement Class consisting of all Persons (other than those Persons who timely and validly request exclusion from the Settlement Class) who purchased or otherwise acquired E*TRADE securities between April 19, 2006 and November 9, 2007, inclusive. Excluded from the Settlement Class are Defendants, members of the Individual Defendants' immediate families, the directors, officers, subsidiaries, and affiliates of E*TRADE, any firm, trust, corporation, or other entity in which any Defendant has a controlling interest, and the legal representatives, affiliates, heirs, successors-in-interest or assigns of any such excluded person or entity.

5. The Settlement Class excludes those Persons who timely and validly filed requests for exclusion from the Settlement Class pursuant to the Notice sent to Settlement Class Members as provided in this Court's Preliminary Approval Order. A list of such Persons who filed timely, completed and valid requests for exclusion from the Settlement Class is attached hereto as Exhibit 1. Persons who filed timely, completed and valid requests for exclusion from the Settlement Class are not bound by this Final Judgment or the terms of the Stipulation, and may pursue their own individual remedies against Defendants and the Released Persons. Such

Persons are not entitled to any rights or benefits provided to Settlement Class Members by the terms of the Stipulation.

6. With respect to the Settlement Class, the Court finds that:

(a) the Settlement Class Members satisfy all of the requirements of Rule 23(a) of the Federal Rules of Civil Procedure because:

- i. the members of the Settlement Class are so numerous that joinder of all members is impracticable;
- ii. there are questions of law and fact common to the Settlement Class;
- iii. the claims and defenses of the representative parties are typical of the Settlement Class; and
- iv. the representative parties will fairly and adequately protect the interests of the Settlement Class.

(b) In addition, the Court finds that the Action satisfies the requirement of Federal Rule of Civil Procedure 23(b)(3) in that there are questions of law and fact common to the Settlement Class Members that predominate over any questions affecting only individual members, and that a class action is superior to other available methods for the fair and efficient adjudication of the controversy; and

(c) The Court finds that Plaintiffs, Kristen Management Limited, Straxton Properties, Inc., Javed Fiyaz, Ira Newman, Peter Farah and Andrea Frascaroli, possess claims that are typical of the claims of Settlement Class Members and that they have and will adequately represent the interest of Settlement Class Members and appoints them as the representatives of the Settlement Class, and appoints Lead Counsel, Brower Piven, A

Professional Corporation, and Co-Lead Counsel, Levi & Korsinsky, LLP, as counsel for the Settlement Class (“Plaintiffs’ Counsel”).

7. The Court hereby finds that objectors Liles and Andrews lack standing to object to the Settlement. The Court further finds that the objections of objectors Liles, Behar, and Andrews to the Notice and/or the Settlement are without factual or legal merits and hereby overrules them in their entirety.

8. Pursuant to Fed. R. Civ. P. 23(e), this Court hereby approves the Settlement set forth in the Stipulation and finds that said Settlement, and all transactions preparatory and incident thereto, is, in all respects, fair, reasonable, and adequate to, and is in the best interests of, Plaintiffs and all Settlement Class Members based on, among other things: the Settlement resulted from arm’s-length negotiations between the Settling Parties and/or their counsel; the amount of the recovery for Settlement Class Members being within the range of reasonableness given the strengths and weaknesses of the claims and defenses thereto and the risks of non-recovery and/or recovery of a lesser amount than is represented through the Settlement by continued litigation through all pretrial, trial and appellate procedures; the recommendation of the Settling Parties, in particular experienced Plaintiffs’ Counsel, and the absence of objections from any Settlement Class Member to the Settlement. All objections to the proposed Settlement, if any, are overruled in their entirety. Accordingly, the Settlement embodied in the Stipulation is hereby approved in all respects and shall be consummated in accordance with its terms and conditions. The Settling Parties are hereby directed to perform the terms of the Stipulation, and the Clerk of the Court is directed to enter and docket this Class Judgment in this Action.

9. The Court hereby finds that objector Andrews lacks standing to object to the Plan of Allocation. The Court further finds that the objections of objectors Behar and Andrews to the Plan of Allocation are without factual or legal merits and hereby overrules them in their entirety.

10. This Court hereby approves the Plan of Allocation as set forth in the Notice as fair and equitable, and overrules all objections to the Plan of Allocation, if any, in their entirety. The Court directs Plaintiffs' Lead Counsel to proceed with the processing of Proofs of Claim and the administration of the Settlement pursuant to the terms of the Plan of Allocation and, upon completion of the claims processing procedure, to present to this Court a proposed final distribution order for the distribution of the Net Settlement Fund to eligible Settlement Class Members, as provided in the Stipulation and Plan of Allocation.

11. The Court hereby finds that objectors Liles and Andrews lack standing to object to Plaintiffs' Counsel's request for an award of attorneys' fees and request for reimbursement of litigation expenses. The Court further finds that the objections of objectors Liles, Behar, and Andrews to the Plaintiffs' request for an award of attorneys' fees and request for reimbursement of litigation expenses are without factual or legal merits and hereby overrules them in their entirety.

12. This Court hereby awards Plaintiffs' Counsel reimbursement of their out-of-pocket expenses in the amount of \$ 554,950.23, and attorneys' fees equal to 28 % percent of the balance of the Settlement Fund, with interest to accrue on all such amounts at the same rate and for the same periods as has accrued by the Settlement Fund from the date of this Final Judgment to the date of actual payment of said attorneys' fees and expenses to Plaintiffs' Counsel as provided in the Stipulation. The Court finds the amount of attorneys' fees awarded herein are fair and reasonable based on: (a) the work performed and costs incurred

by Plaintiffs' Counsel; (b) the complexity of the case; (c) the risks undertaken by Plaintiffs' Counsel and the contingent nature of their employment; (d) the quality of the work performed by Plaintiffs' Counsel in this Action and their standing and experience in prosecuting similar class action securities litigation; (e) awards to successful plaintiffs' counsel in other, similar litigation; (f) the benefits achieved for Settlement Class Members through the Settlement; and (g) the absence of a significant number of objections from Settlement Class Members to either the application for an award of attorneys' fees or reimbursement of expenses to Plaintiffs' Counsel. The Court also finds that the requested reimbursement of expenses is proper as the expenses incurred by Plaintiffs' Counsel, including the costs of experts, were reasonable and necessary in the prosecution of this Action on behalf of Settlement Class Members.

13. Based on the foregoing, the Court finds that the objection by Mr. Ventris has been resolved and is moot. The attorneys' fees awarded and expenses reimbursed above shall otherwise be paid to Plaintiffs' Counsel as provided in the Stipulation.

14. Plaintiffs' Counsel may apply, from time to time, for any fees and/or expenses incurred by them solely in connection with the administration of the Settlement and distribution of the Net Settlement Fund to Settlement Class Members.

15. All payments of attorneys' fees and reimbursement of expenses to Plaintiffs' Counsel in the Action shall be made from the Settlement Fund, and the Released Persons shall have no liability or responsibility for the payment of any of Plaintiffs' or Plaintiffs' Counsel's attorneys' fees or expenses except as expressly provided in the Stipulation with respect to the cost of Notice and administration of the Settlement.

16. Pursuant to Federal Rule of Civil Procedure 23(c)(3), all Settlement Class Members who have not filed timely, completed and valid requests for exclusion from the

Settlement Class are thus Settlement Class Members who are bound by this Final Judgment and by the terms of the Stipulation.

17. The Released Persons are hereby released and forever discharged from any and all of the Released Claims. All Settlement Class Members are hereby forever barred and enjoined from asserting, instituting or prosecuting, directly or indirectly, any Released Claim in any court or other forum against any of the Released Persons. All Settlement Class Members are bound by paragraph 4.4 of the Stipulation and are hereby forever barred and enjoined from taking any action in violation of that provision.

18. The Court hereby dismisses with prejudice the Action and all Released Claims against each and all Released Persons and without costs to any of the Settling Parties as against the others.

19. Neither the Stipulation nor the settlement contained therein, nor any act performed or document executed pursuant to or in furtherance of the Stipulation or the settlement: (a) is or may be deemed to be or may be used as an admission of, or evidence of, the validity of any Released Claim, or of any wrongdoing or liability of the Defendants; or (b) is or may be deemed to be or may be used as an admission of, or evidence of, any fault or omission of any of the Defendants in any civil, criminal, or administrative proceeding in any court, administrative agency, or other tribunal; or (c) is admissible in any proceeding except an action to enforce or interpret the terms of the Stipulation, the settlement contained therein, and any other documents executed in connection with the performance of the agreements embodied therein. Defendants and/or the other Released Persons may file the Stipulation and/or this Final Judgment and Order in any action that may be brought against them in order to support a defense or counterclaim based on the principles of res judicata, collateral estoppel, full faith and credit,

release, good faith settlement, judgment bar or reduction, or any other theory of claim preclusion or issue preclusion or similar defense or counterclaim.

20. The Court finds that during the course of the Action, the Settling Parties and their respective counsel at all times complied with the requirements of Federal Rule of Civil Procedure 11.

21. Without affecting the finality of this Final Judgment in any way, this Court hereby reserves and retains continuing jurisdiction over: (a) implementation and enforcement of any award or distribution from the Settlement Fund or Net Settlement Fund; (b) disposition of the Settlement Fund or Net Settlement Fund; (c) determining applications for payment of attorneys' fees and/or expenses incurred by Plaintiffs' Counsel in connection with administration and distribution of the Net Settlement Fund; (d) payment of taxes by the Settlement Fund; (e) all parties hereto for the purpose of construing, enforcing, and administering the Stipulation; and (f) any other matters related to finalizing the Settlement and distribution of the proceeds of the Settlement.

22. Neither appellate review nor modification of the Plan of Allocation set forth in the Notice, nor any action in regard to the motion by Plaintiffs' Counsel for attorneys' fees and/or reimbursement of expenses and the award of costs and expenses to Plaintiffs, shall affect the finality of any other portion of this Final Judgment, nor delay the Effective Date of the Stipulation, and each shall be considered separate for the purposes of appellate review of this Final Judgment.

23. In the event that the Settlement does not become Final in accordance with the terms of the Stipulation or the Effective Date does not occur, or in the event that the Settlement Fund, or any portion thereof, is returned to the Defendants, then this Final Judgment shall be

rendered null and void to the extent provided by and in accordance with the Stipulation and shall be vacated and, in such event, all orders entered and releases delivered in connection herewith shall be null and void to the extent provided by and in accordance with the Stipulation.

24. This Final Judgment and Order is a final judgment in the Action as to all claims asserted. This Court finds, for purposes of Rule 54(b) of the Federal Rules of Civil Procedure, that there is no just reason for delay and expressly directs entry of judgment as set forth herein.

Dated: Oct. 20, 2012


HONORABLE J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE

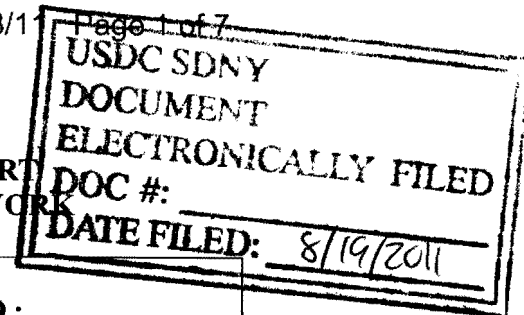
Exhibit A – Exclusions

1. Robert F Lentes Jr TOD
2. Ronald M Tate, Trustee
3. George Avakian
4. Jaehong Park
5. Kenneth L. Kientz
6. Luis Aragon & Michelle Aragon

Exhibit 22

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**



IN RE TREMONT SECURITIES LAW, STATE LAW AND INSURANCE LITIGATION	: MASTER FILE NO.:
	: 08 CIV. 11117 (TPG)
	:
	:
This Document Relates To:	:
	:
Securities Actions	: 08 CIV. 11212 (TPG)
State Law Actions	: 08 CIV. 11183 (TPG)
	:

**~~[PROPOSED]~~ ORDER AND FINAL JUDGMENT GRANTING PLAINTIFFS' STATE
AND SECURITIES LAW SETTLEMENT CLASS COUNSELS' MOTION FOR AWARD
OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND AWARDS TO
STATE LAW AND SECURITIES PLAINTIFFS**

This matter came before the Court for a hearing which was held on June 1 and August 8, 2011 ("Final Fairness Hearing"), pursuant to the Order of this Court entered on April 5, 2011, on the application of Plaintiffs' State and Securities Law Settlement Class Plaintiffs' for: (i) an award of attorneys' fees; (ii) reimbursement of expenses to Plaintiffs' State and Securities Law Settlement Class Counsel; (iii) reimbursement to Lead Plaintiffs in the Securities Action for their costs and expenses incurred as a result of the representation of the Settlement Class; and (iv) awards to State Law Representatives for their reasonable time, effort, and expense incurred in representing the Settlement Class.

The Court, having considered all matters submitted to it at the Final Fairness Hearing and otherwise, IT IS HEREBY ORDERED, ADJUDGED AND DECREED as follows:

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1. Unless otherwise defined herein, all capitalized terms used herein have the meanings as set forth and defined in the Stipulation.

2. Plaintiffs' State and Securities Law Settlement Class Counsel are hereby awarded: (i) attorneys' fees in the amount of 30% of their portion of the Gross Settlement Fund (consisting of 91.8% of the Initial Settlement Amount and any amounts subsequently deposited into the Gross Settlement Fund pursuant to the terms of the Settlement);¹ (ii) reimbursement of \$432,611.69 in total out-of-pocket costs and expenses that were reasonably and necessarily incurred in prosecuting the State Law and Securities Actions and obtaining this Settlement; (iii) reimbursement of \$20,000 of costs and expenses incurred by Lead Plaintiffs in the Securities Actions pursuant to the PSLRA, § 15 U.S.C. 78u-4(a)(4), in their representation of the Settlement Class; and (iv) an award of \$10,000 to each of the State Law Representatives for their representation of the Settlement Class. The award of attorneys' fees shall be allocated by State and Securities Law Settlement Class Counsel in a manner that State and Securities Law Settlement Class Counsel believe fairly compensates counsel for their respective contributions in the prosecution of the State Law Actions and the Securities Actions.

3. Plaintiffs' State and Securities Law Settlement Class Counsel will make a further application for an award of attorneys' fees related to the Fund Distribution Account at the time of their motion for approval of the Fund Distribution Account Plan of Distribution.

¹ Pursuant to the Stipulation, Plaintiffs' State and Securities Law Settlement Class Counsel are to be allocated ninety-one and eight tenths of a percent (91.8%) of any attorneys' fees awarded by the Court from the Gross Settlement Fund. Plaintiffs' Insurance Settlement Class Counsel are to be allocated 8.2% of any attorneys' fees awarded by the Court from the Gross Settlement Fund.

4. In making this award of attorneys' fees and reimbursement of expenses to be paid from the Gross Settlement Fund and the Fund Distribution Account, the Court has considered and found that:

(a) the Settlement Fund is initially funded by a payment of \$100 million (which may be increased by as much as 50% of any recovery in the \$200 million insurance coverage litigation by Settling Defendants against their fidelity bond carriers, any recovery from the prosecution of the Assigned Claims and any remaining assets in Tremont Holdings, Inc. and its subsidiaries, following the winding down of the Tremont and Rye Funds) (all to be paid to State Law and Securities Members that submit acceptable Proofs of Claim and Release forms pursuant to the Settlement Fund Plan of Allocation). The Fund Distribution Account is to be funded with the net proceeds from the Madoff Trustee litigation against Tremont, the prosecution of the funds' claims in the consolidated SIPC and BLMIS proceedings, the net investments of the excluded Individual Defendants and their spouses who were investors in the funds (and is to be paid out pursuant to the Fund Distribution Account Plan of Allocation and the interests of fairness and equity) and all management and other fees waived by the Settling Defendants;

(b) copies of the State Law and Securities Notice, Supplemental Notice and related materials were disseminated to potential State Law and Securities Subclass Members (approximately 4,800 copies were mailed or otherwise distributed by the Notice and Claims Administrator); published in various public sources; and made available at the offices of Settlement Class Counsel (and on their web sites), the offices of the Notice and Claims Administrator (and on the website set up by the Notice and Claims Administrator for this purpose) – all indicating that Plaintiffs' State and Securities Law Settlement Class Counsel were

moving for attorneys' fees in the amount of up to 30% of their portion of the Gross Settlement Fund and 3% of the Fund Distribution Account, plus interest, and for reimbursement of expenses estimated at \$500,000;

(c) Plaintiffs' State and Securities Law Settlement Class Counsel have conducted the litigation of the State Law Actions and the Securities Actions and achieved the Settlement with skill, perseverance and diligent advocacy;

(d) Plaintiffs' State and Securities Law Settlement Class Counsel have worked cooperatively with the Defendants' Counsel in connection with a settlement with the Madoff Trustee that preserves a recognized claim of almost \$3 billion thereby assuring a significant benefit will flow from the Trustee proceedings into the Fund Distribution Account for the benefit of investors;

(e) the State Law and Securities Actions involve numerous complex factual and legal issues and were actively litigated for more than two years and, in the absence of a settlement, would have involved lengthy proceedings with uncertain resolution of the numerous complex factual and legal issues;

(f) had Plaintiffs' State and Securities Law Settlement Class Counsel not achieved the Settlement, a significant risk would remain that State Law and Securities Plaintiffs and the State Law and Securities Subclasses may have recovered less or nothing from Settling Defendants;

(g) Plaintiffs' State and Securities Law Settlement Class Counsel have devoted collectively over 28,885 hours, with a lodestar value of \$15,702,921.50 in connection with these matters; and

(h) the amount of attorneys' fees awarded and expenses reimbursed from the Gross Settlement Fund and Fund Distribution Account are fair, reasonable and appropriate and consistent with the awards in similar cases.

5. The Court hereby awards Lead Plaintiffs in the Securities Actions a total of \$20,000 in reimbursement for their costs and expenses incurred as a result of the representation of the Settlement Class.

6. The Court hereby awards \$10,000 to each of the State Law Representatives as compensation for their reasonable time, effort, and expense incurred in representing the Settlement Class.

7. The Court finds that no just reason exists for delay in entering final judgment pursuant to Rule 54(b) of the Federal Rules of Civil Procedure in accordance with the Stipulation. Accordingly, the Clerk is hereby directed to enter this Judgment forthwith pursuant to Rule 54(b).

8. The moving and reply papers reflect a variety of factors that support entry of a final judgment pursuant to 54(b). The Court is entering a separate final judgment regarding the Stipulation, which approves the Settlement and concludes further litigation on the merits of the claims addressed therein, barring a reversal on appeal. The request for fees addressed in this Judgment is not part of the merits of the actions to which the fees pertain.

9. The Settlement provides that: (i) any appeal pertaining solely to a fee application shall not delay or preclude the Judgment from becoming final; (ii) the procedures for, and the allowance or disallowance by the Court of, the fee application are not part of the Settlement, and are to be considered separately from the Court's consideration of the fairness, reasonableness and

adequacy of the Settlement; and (iii) any order or proceeding relating to any appeal from the fee application shall not operate to terminate or cancel the Stipulation, or affect the finality of the Judgment or delay the Settlement of the Actions. In addition, the Court finds that an appeal of this Judgment should not operate to delay distribution of monies to interested investors pursuant to the Stipulation and/or Plans of Allocation, given that any such delay could cause further hardship to investors.

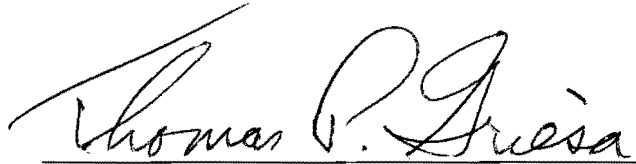
10. In light of all the relevant circumstances, and in light of the factors appearing from the moving and reply papers, the Court expressly finds and determines that no just reason exists for delay in entering final judgment pursuant to Rule 54(b) of the Federal Rules of Civil Procedure in accordance with the Stipulation and separately with respect to this Judgment. Accordingly, the Clerk is hereby directed to enter this Judgment forthwith pursuant to Rule 54(b).

11. The Court also finds and declares, in accordance with the Declaratory Judgment Act (28 U.S.C. §§ 2201-2202), that: (i) the notice and hearing regarding Plaintiffs' State and Securities Law Counsels' "Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Awards to State Law and Securities Plaintiffs" were fair, adequate, reasonable, and consistent with this Court's prior Notice Order; (ii) the attorneys' fees, expense reimbursements, and Plaintiff awards are fair, adequate and reasonable; and (iii) Settlement Class Counsel may allocate such fees, reimbursements, and awards according to the terms of this Order and the Stipulation.

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12. The Court has considered the Objections made by various objectors and, to the extent not withdrawn, finds them to lack standing, be deficient and otherwise without merit and hereby determines that they are overruled.

SIGNED this 19th day of August, 2011

A handwritten signature in black ink, reading "Thomas P. Griesa". The signature is written in a cursive style with a horizontal line underneath.

Honorable Thomas P. Griesa
UNITED STATES DISTRICT JUDGE

Exhibit 23

THIS MATTER having come before the Court on July 18, 2011, on the motion of Lead Plaintiffs' counsel for an award of attorneys' fees and expenses incurred in the Action; the Court, having considered all papers filed and proceedings conducted herein, having found the settlement of the Action to be fair, reasonable, and adequate and otherwise being fully informed in the premises and good cause appearing therefore;

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that:

1. All of the capitalized terms used herein shall have the same meanings as set forth in the Settlement Agreement dated March 7, 2011.

2. This Court has jurisdiction over the subject matter of this application and all matters relating thereto, including all members of the Settlement Class who have not timely and validly requested exclusion.

3. Counsel for the Lead Plaintiffs are entitled to a fee paid out of the common fund created for the benefit of the Settlement Class. *Boeing Co. v. Van Gemert*, 444 U.S. 472, 478-79 (1980). In class action suits where a fund is recovered and fees are awarded therefrom by the court, the Supreme Court has indicated that computing fees as a percentage of the common fund recovered is the proper approach. *Blum v. Stenson*, 465 U.S. 886, 900 n.16 (1984). The Second Circuit recognizes the propriety of the percentage-of-the-fund method when awarding fees. *Wal-Mart Stores, Inc. v. Visa U.S.A. Inc.*, 396 F.3d 96, 121 (2d Cir. 2005).

4. Lead Plaintiffs' counsel have moved for an award of attorneys' fees of 27.5% of the Settlement Fund, plus interest.

5. This Court adopts the percentage-of-recovery method of awarding fees in this case, and concludes that the percentage of the benefit is the proper method for awarding attorneys' fees in this case.

6. The Court hereby awards attorneys' fees of 27.5% of the Settlement Fund, plus interest at the same rate as earned on the Settlement Fund. The Court finds the fee award to be fair and reasonable. The Court further finds that a fee award of 27.5% of the Settlement Fund is consistent with awards made in similar cases.

7. Said fees shall be allocated among plaintiffs' counsel by Co-Lead Counsel in manner which, in their good faith judgment, reflects each counsel's contribution to the institution, prosecution and resolution of the Action.

8. The Court hereby awards expenses in an aggregate amount of \$285,072.62, plus interest.

9. In making this award of attorneys' fees and expenses to be paid from the Settlement Fund, the Court has considered each of the applicable factors set forth in *Goldberger v. Integrated Res., Inc.*, 209 F.3d 43, 50 (2d Cir. 2000). In evaluating the *Goldberger* factors, the Court finds that:

(a) Counsel for Lead Plaintiffs expended considerable effort and resources over the course of the Action researching, investigating and prosecuting Lead Plaintiffs' claims. Lead Plaintiffs' counsel have represented that they have reviewed tens of thousands of pages of documents, interviewed witnesses and opposed legally and factually complex motions to dismiss. The parties also engaged in settlement negotiations that lasted several months. The services provided by Lead Plaintiffs' counsel were efficient and highly successful, resulting in an outstanding recovery for the Settlement Class without the substantial expense, risk and delay of continued litigation. Such efficiency and effectiveness supports the requested fee percentage.

(b) Cases brought under the federal securities laws are notably difficult and notoriously uncertain. *In re AOL Time Warner, Inc. Sec. & ERISA Litig.*, No. MDL 1500, 2006 U.S. Dist. LEXIS 17588, at *31 (S.D.N.Y. Apr. 6, 2006). "[S]ecurities actions have become more

difficult from a plaintiff's perspective in the wake of the PSLRA." *In re Ikon Office Solutions, Inc., Sec. Litig.*, 194 F.R.D. 166, 194 (E.D. Pa. 2000). Despite the novelty and difficulty of the issues raised, and the procedural posture of the case, Lead Plaintiffs' counsel secured an excellent result for the Settlement Class.

(c) The recovery obtained and the backgrounds of the lawyers involved in the lawsuit are the best evidence that the quality of Lead Plaintiffs' counsel's representation of the Settlement Class supports the requested fee. Lead Plaintiffs' counsel demonstrated that notwithstanding the barriers erected by the PSLRA, they would develop evidence to support a convincing case. Based upon Lead Plaintiffs' counsel's diligent efforts on behalf of the Settlement Class, as well as their skill and reputations, Lead Plaintiffs' counsel were able to negotiate a very favorable result for the Settlement Class. Lead Plaintiffs' counsel are among the most experienced and skilled practitioners in the securities litigation field, and have unparalleled experience and capabilities as preeminent class action specialists. Their efforts in efficiently bringing the Action to a successful conclusion against the Defendants are the best indicator of the experience and ability of the attorneys involved. In addition, Defendants were represented by highly experienced lawyers from a prominent firm. The standing of opposing counsel should be weighed in determining the fee, because such standing reflects the challenge faced by plaintiffs' attorneys. The ability of Lead Plaintiffs' counsel to obtain such a favorable settlement for the Settlement Class in the face of such formidable opposition confirms the superior quality of their representation and the reasonableness of the fee request.

(d) The requested fee of 27.5% of the settlement is within the range normally awarded in cases of this nature.

(e) Public policy supports the requested fee, because the private attorney general role is “vital to the continued enforcement and effectiveness of the Securities Acts.” *Taft v. Ackermans*, No. 02 Civ. 7951(PKL), 2007 U.S. Dist. LEXIS 9144, at *33 (S.D.N.Y. Jan. 31, 2007) (citation omitted).

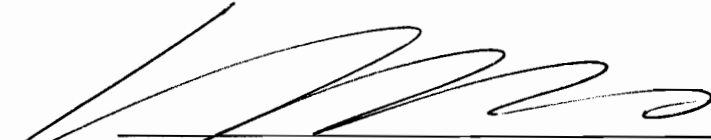
(f) Lead Plaintiffs’ counsel’s total lodestar is \$4,049,631.50. A 27.5% fee represents a multiplier of 4.7. Given the public policy and judicial economy interests that support the expeditious settlement of cases, *Maley v. Del Global Techs. Corp.*, 186 F. Supp. 2d 358, 373 (S.D.N.Y. 2002), the requested fee is reasonable.

10. The awarded attorneys’ fees and expenses, and interest earned thereon, shall be paid to Co-Lead Counsel from the Settlement Fund immediately after the date this Order is executed subject to the terms, conditions, and obligations of the Settlement Agreement and in particular ¶6.2 thereof, which terms, conditions, and obligations are incorporated herein.

IT IS SO ORDERED.

Dated: New York, NY

18 July, 2011


THE HONORABLE VICTOR MARRERO
UNITED STATES DISTRICT JUDGE



CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2011, I submitted the foregoing to orders and judgments@nysd.uscourts.gov and e-mailed to the e-mail addresses denoted on the Court's Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 11, 2011.

s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART

ROBBINS GELLER RUDMAN
& DOWD LLP

655 West Broadway, Suite 1900

San Diego, CA 92101-3301

Telephone: 619/231-1058

619/231-7423 (fax)

E-mail: elleng@rgrdlaw.com

Bernard M. Gross
THE LAW OFFICE OF BERNARD M. GROSS, P.C.
100 Penn Square East, Suite 450
Juniper and Market Streets
Philadelphia, PA 19107

Exhibit 24

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TONOPAH SOLAR ENERGY, LLC,¹

Debtor.

Chapter 11

Case No. 20-11884 (KBO)

Hearing Date: August 24, 2020 at 10:00 a.m. (ET)

Objection Deadline: August 13, 2020 at 4:00 p.m. (ET)

**DEBTOR’S APPLICATION FOR AN ORDER AUTHORIZING THE
RETENTION AND EMPLOYMENT OF WILSON SONSINI GOODRICH & ROSATI,
P.C. AS SPECIAL CORPORATE, LITIGATION AND REGULATORY COUNSEL,
EFFECTIVE AS OF THE PETITION DATE**

The above-captioned debtor and debtor in possession (the “**Debtor**”) hereby submits this application (this “**Application**”) seeking entry of an order, substantially in the form attached hereto as Exhibit A (the “**Proposed Order**”), authorizing the Debtor to employ and retain Wilson Sonsini Goodrich & Rosati, P.C. (“**Wilson Sonsini**”), as special corporate, litigation and regulatory counsel, effective as of the Petition Date (as defined below). In support of this Application, the Debtor submits the *Declaration of Todd G. Glass in Support of the Debtor’s Retention of Wilson Sonsini as Special Corporate, Litigation and Regulatory Counsel* (the “**Glass Declaration**”), attached hereto as Exhibit B, and the *Declaration of Justin D. Pugh in Support of the Debtor’s Chapter 11 Petition and First Day Motions* (the “**First Day Declaration**”). In further support of this Application, the Debtor respectfully states as follows.

JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court

¹ The Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is Tonopah Solar Energy, LLC (1316). The Debtor’s headquarters is located at 11 Gabbs Pole Line Road, Tonopah, NV 89049.

for the District of Delaware, dated as of February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and pursuant to Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), the Debtor consents to the entry of a final order by the Court in connection with this Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory and legal predicates for the relief requested herein are sections 327(e) and 330 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”) and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure, and Local Rules 2014-1 and 2016-1.

BACKGROUND

3. On July 30, 2020 (the “**Petition Date**”), the Debtor commenced a voluntary case under chapter 11 of the Bankruptcy Code (the “**Chapter 11 Case**”). The Debtor is authorized to operate its business and manage its properties as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No official committees have been appointed in the Chapter 11 Case and no request has been made for the appointment of a trustee or an examiner.

4. The Debtor commenced the Chapter 11 Case to effectuate a consensual financial restructuring that has the support of the Debtor’s prepetition secured lender. The Debtor has filed the *Chapter 11 Plan for Tonopah Solar Energy, LLC* (as it may be amended, supplemented, restated, or modified from time to time, the “**Plan**”), as well as a disclosure

statement for the Plan. The Plan provides for the comprehensive restructuring of the Debtor's balance sheet (the "**Restructuring**"). The Restructuring will position the Debtor to emerge quickly from Chapter 11 with a renewed focus on obtaining full operational capacity through the completion of ongoing repair activities at the Debtor's solar energy power plant (the "**Power Plant**"). To that end, the Debtor intends to seek prompt confirmation of the Plan.

5. Additional information regarding the Debtor's business, capital structure, and the circumstances leading to the filing of the Chapter 11 Case is set forth in the First Day Declaration.

RELIEF REQUESTED

6. The Debtor seeks entry of the Proposed Order authorizing the employment and retention of Wilson Sonsini as special corporate, litigation and regulatory counsel to the Debtor, effective as of the Petition Date, in accordance with the terms and conditions set forth in the parties' engagement agreement (the "**Engagement Agreement**"), dated January 11, 2018, a copy of which is attached as Schedule 1 to Exhibit B.

A. Wilson Sonsini's Qualifications

7. Wilson Sonsini is a premier legal advisor to technology, life sciences, and growth enterprises worldwide, as well as the venture firms, private equity firms, and investment banks that finance them. Wilson Sonsini represents companies from entrepreneurial start-ups to multibillion-dollar global corporations at every stage of development.

8. Wilson Sonsini is nationally recognized for providing high-quality services to address the legal solutions required by its enterprise and financial institution clients. Wilson Sonsini offers a full spectrum of legal services, including corporate law and governance, mergers and acquisitions, finance, litigation, technology licensing and other intellectual property transactions, tax, and regulatory and compliance matters, among other areas. Its clients are

companies and other entities that compete in rapidly developing and innovative industries, including the energy sector. Wilson Sonsini's interdisciplinary energy practice includes attorneys with specific expertise in the traditional energy industry, as well as with emerging technologies. The firm assists its energy clients with a broad range of matters including all aspects of developing commercial and utility-scale energy and infrastructure projects, obtaining state and federal regulatory approvals, and securing debt and equity financing for such projects—or advising investors, banks and other financial institutions in financing such projects.

9. Wilson Sonsini has represented the Debtor since January 2018 and, over the course of this representation, has developed an extensive and unique knowledge of the Debtor's business and the various transactional, operational, financing, energy regulatory, and construction litigation matters stemming from the operation and failures of the Power Plant. Specifically, Wilson Sonsini has advised the Debtor on various corporate governance issues, as well as certain energy offtake and construction contracts, financing, and various regulatory issues. Wilson Sonsini has also represented the Debtor in litigation with the Debtor's affiliate, SolarReserve CSP Holdings, LLC, currently pending in the Court of Chancery of the State of Delaware.

10. Wilson Sonsini also has unique expertise in regulatory matters that may be critical to the success of the Chapter 11 Case. Wilson Sonsini has a dedicated team with expertise in matters relating to the Committee on Foreign Investment in the United States (“CFIUS”), which may be involved in reviewing the transactions contemplated by the Plan. Wilson Sonsini's extensive expertise addressing CFIUS matters, including in the bankruptcy context, will enable the firm to provide key insight and advice to facilitate the Debtor's successful emergence from Chapter 11.

11. Given that Wilson Sonsini has extensive experience in corporate, litigation, transactional, and regulatory matters and that it has acquired extensive institutional knowledge of the Debtor's business affairs, the Debtor believes Wilson Sonsini to be well-qualified and able to represent it in an efficient and effective manner.

12. The Debtor has requested authorization to retain Willkie Farr & Gallagher LLP and Young Conaway Stargatt & Taylor, LLP (collectively, "**Bankruptcy Counsel**") as bankruptcy co-counsel by applications filed contemporaneously herewith. Although the Debtor is seeking to retain Bankruptcy Counsel, the Chapter 11 Case will require counsel with extensive experience, knowledge, and expertise in areas of corporate, litigation and regulatory matters in the context of the energy industry, and Wilson Sonsini has served the Debtor in such capacity since January 2018.

13. Wilson Sonsini's continued representation of the Debtor remains in the best interest of the Debtor's estate and will avoid disruption of the Debtor's business and legal affairs at a critical time. The Debtor further submits that the employment of Wilson Sonsini as special corporate, litigation and regulatory counsel will not be duplicative of, but will instead augment the services to be provided by Bankruptcy Counsel. Should the Debtor be required to retain counsel other than Wilson Sonsini, the Debtor, its estate, and all parties in interest will be prejudiced by the time and expense necessary to enable other counsel to become familiar with the intricacies of the Debtor's business, operations, and historical and pending litigation.

B. Services to be Provided

14. The Debtor requests the employment and retention of Wilson Sonsini to render necessary services relating to various corporate, construction, financing, litigation, and other matters during the pendency of the Chapter 11 Case, including specifically (i) strategic corporate, energy transactional, and financing advice to the Debtor, (ii) advice and services

related to various pending litigation matters, and (iii) advice and services relating to certain regulatory approvals that the Debtor may seek. Wilson Sonsini has the necessary resources, expertise and institutional knowledge to provide such advice and services and is familiar with the Debtor's business and many of the legal issues likely to arise on the matters for which it is retained.

15. Wilson Sonsini and the Debtor's other legal counsel will coordinate to prevent unnecessary or inefficient duplication of services, and will take appropriate steps to avoid any such unnecessary duplication.

C. **Compensation**

16. Wilson Sonsini will seek Court approval of its compensation and reimbursement of its actual, necessary and reasonable expenses, and other charges incurred by Wilson Sonsini in connection with the Chapter 11 Case, upon the filing of appropriate applications for interim and final compensation and reimbursement of expenses pursuant to sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and any applicable procedures or orders of this Court. In addition, Wilson Sonsini will make reasonable efforts to comply with the *Guidelines for Reviewing Applications and for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C § 330 by Attorneys in Larger Chapter 11 Cases* (the "**U.S. Trustee Guidelines**").

17. Wilson Sonsini's current hourly rates for matters related to this Chapter 11 Case range as follows:

Hourly Rates for Professional Services

Members of the Firm	\$925 to \$1750
Associates	\$510 to \$920
Counsel/Of Counsel	\$440 to \$1350

Legal Staff\$120 to \$480

Library Personnel\$200

18. Wilson Sonsini has explained to the Debtor that the hourly rates set forth above are (a) set at a level designed to fairly compensate Wilson Sonsini for its work and to cover fixed and routine overhead expenses, (b) standard for work of this nature inside or outside bankruptcy, and (c) remain subject to periodic, firm-wide adjustments in the ordinary course of Wilson Sonsini's business. During its representation of the Debtor, Wilson Sonsini has applied, and will continue to apply, a 10% discount to its standard hourly rates.

19. It is Wilson Sonsini's policy to charge its clients in all areas of practice for all other expenses incurred in connection with the client's case. The expenses charged to clients include, among other things, mail and express mail charges, special or hand delivery charges, document processing, photocopying charges, charges for mailing supplies (including, without limitation, envelopes and labels) provided by Wilson Sonsini to outside copying services for use in mass mailings, travel expenses, expenses for "working meals," computerized research, transcription costs, as well as non-ordinary overhead expenses approved by the client, such as secretarial and other overtime. Wilson Sonsini will charge the Debtor for these expenses in a manner and at rates consistent with charges made generally to Wilson Sonsini's other clients. Wilson Sonsini believes that it is fairer to charge these expenses to the clients incurring them than to increase the hourly rates and spread the expenses among all clients.

20. In the one-year period prior to the Petition Date, Wilson Sonsini received payments from the Debtor in the amount of \$2,365,907.92, consisting of payments for professional fees and expenses incurred prior to the Petition Date and a retainer in the amount of \$200,000.00. A summary of these payments is attached as Schedule 2 to Exhibit B. Other than

as set forth herein, Wilson Sonsini did not receive any payments from the Debtor during the one-year period before the Petition Date.

21. Wilson Sonsini has neither shared nor agreed to share (a) any compensation it has received or may receive with another party or person, other than with attorneys or staff directly associated with Wilson Sonsini or (b) any compensation another person or party has received or may receive.

D. Wilson Sonsini's Disinterestedness

22. Wilson Sonsini is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code in that the firm, its members, counsel, and associates:

- (a) are not creditors, equity security holders, or insiders of the Debtor;
- (b) are not and were not, within two (2) years of the Petition Date, directors, officers, or employees of the Debtor; and
- (c) do not have an interest materially adverse to the interests of the Debtor's estate or of any class of the Debtor's creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason.

23. Except as set forth below and in the Glass Declaration, to the best of the Debtor's knowledge, information, and belief, Wilson Sonsini does not represent, and does not hold any interest adverse to the Debtor's estate, its creditors, or equity security holders, its respective attorneys and accountants, the United States Trustee for the District of Delaware (the “**U.S. Trustee**”), any person employed by the Office of the U.S. Trustee, or any other party in interest in the Chapter 11 Case (a) in the matters for which Wilson Sonsini is to be retained or (b) in matters related to the services to be performed by Wilson Sonsini for the Debtor. Except as described below and in the Glass Declaration, or as may be determined upon consent of the Debtor and its counsel and the filing of a supplemental declaration with the Court, Wilson Sonsini has agreed not to represent any creditors or parties in interest in the Chapter 11 Case in

any matters adverse to the Debtor or its estate. Moreover, the lawyers and staff expected to provide services to the Debtor on behalf of Wilson Sonsini are not related to the U.S. Trustee assigned to the Chapter 11 Case, any person employed in the Office of the U.S. Trustee, or the Bankruptcy Judge presiding over the Chapter 11 Case.

24. Wilson Sonsini has informed the Debtor that it will periodically review its files during the pendency of the Chapter 11 Case to ensure that no conflict arises or other disqualifying circumstances exist or arise. If any new relevant facts or relationship are discovered or arise, Wilson Sonsini will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

BASIS FOR RELIEF

25. The Debtor seeks retention of Wilson Sonsini as its special corporate, litigation, and regulatory counsel pursuant to section 327(e) of the Bankruptcy Code, which provides that a debtor, subject to court approval:

[M]ay employ, for a specified special purpose, other than to represent the trustee in conducting the case, an attorney that has represented the debtor, if in the best interest of the estate, and if such attorney does not represent or hold any interest adverse to the debtor or to the estate with respect to the matter on which such attorney is to be employed.

11 U.S.C § 327(e).

26. Bankruptcy Rule 2014(a) requires that an application for retention include:

[S]pecific facts showing the necessity for the employment, the name of the [firm] to be employed, the reasons for the selection, the professional services to be rendered, any proposed arrangement for compensation, and, to the best of the applicant's knowledge, all of the [firm's] connections with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.

Fed. R. Bankr. P. 2014(a).

27. The Debtor submits that, for all of the reasons stated above and in the Glass Declaration, including Wilson Sonsini's experience representing the Debtor and the institutional knowledge that Wilson Sonsini has obtained therefrom, the Debtor will require the advice and counsel of corporate, litigation, and regulatory counsel to address issues related to the subject matter of Wilson Sonsini's historical representation and expertise, and it is in the best interests of the estate that the Debtor retain Wilson Sonsini as special corporate, litigation, and energy counsel. Therefore, retention of Wilson Sonsini, effective as of the Petition Date, is appropriate and should be approved.

NOTICE

28. Notice of this Application has been given to: (i) the U.S. Trustee; (ii) holders of the twenty (20) largest unsecured claims against the Debtor/the official committee of unsecured creditors; (iii) counsel for Cobra Energy Investments, LLC; (iv) counsel for the Collateral Agent; (v) outside counsel for the U.S. Department of Energy; (vi) the U.S. Department of Justice; and (vii) all parties that, as of the filing of this Application, have requested notice in the Chapter 11 Case pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested herein, the Debtor submits that no other or further notice is necessary.

[Signature page follows]

CONCLUSION

WHEREFORE, for the reasons set forth herein, the Debtor respectfully requests that the Court enter an Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other and further relief as is just and proper.

Dated: July 30, 2020

Tonopah Solar Energy, LLC
Debtor and Debtor-in-Possession

By: /s/ Justin D. Pugh
Justin D. Pugh, Treasurer