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17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

18 **FOR THE COUNTY OF RIVERSIDE**

19 IN RE: RENOVATE AMERICA FINANCE ) Case No. RICJCCP4940  
20 CASES )  
21 ) **DECLARATION OF JASON P.**  
22 ) **SULTZER IN SUPPORT OF**  
23 ) **PLAINTIFFS' MOTION FOR AWARD**  
24 ) **OF ATTORNEYS' FEES,**  
25 ) **REIMBURSEMENT OF EXPENSES,**  
26 ) **AND CLASS REPRESENTATIVE**  
27 ) **AWARDS**  
28 )  
\_\_\_\_\_) **DATE: July 8, 2020**  
\_\_\_\_\_) **TIME: 8:30 a.m.**  
\_\_\_\_\_) **JUDGE: Hon. Sunshine S. Sykes**  
\_\_\_\_\_) **DEPT.: 6**

1  
2 I, Jason P. Sultzer, hereby declare as follows:

3 1. I am a partner at The Sultzer Law Group P.C., one of the counsel for Plaintiffs  
4 and the Class in the above-captioned action. Pursuant to the requirements of sections H.4. and  
5 H.5. of the Class Action Case Management Order #1 (“CMO #1”) entered in this matter on  
6 November 8, 2016 by the Honorable Craig G. Riemer, I respectfully submit this Declaration in  
7 support of my firm’s application for an award of attorneys’ fees in connection with services  
8 rendered in this case, as well as the reimbursement of expenses incurred by my firm in  
9 connection with this litigation. Except as otherwise noted, the facts set forth in this declaration  
10 are based in part upon my personal knowledge, and I would competently testify to them if called  
11 upon to do so.

12 2. I have significant and extensive litigation experience, having been involved in  
13 litigation since my admission to the bar in 1998.

14 3. The work done by my firm in this case includes: initial factual investigation;  
15 conducting legal research regarding Plaintiffs’ potential claims; drafting pleadings; client  
16 communications for the purposes of, among other things, review of relevant facts, status of  
17 matter and strategy, and review of the Settlement Agreement; corresponding with counsel for  
18 Defendants; attending some key court appearances; assisting Plaintiffs in gathering evidentiary  
19 materials; attending the settlement mediation; and preparing the settlement-related documents  
20 and briefs. All the work performed by our firm was undertaken on a contingent basis and our  
21 firm has not received any payment in this case.

22 4. My firm kept detailed records regarding the amount of time spent by my firm, and  
23 the lodestar calculation is based on my firm’s current billing rates. The information was prepared  
24 from contemporaneous, daily time records regularly prepared and maintained by my firm, true  
25 and correct copies (redacted to remove privileged information) of which are attached hereto as  
26 **Exhibit A.**

5. In summary, the total number of hours spent by my firm rendering services through the date of this declaration, 196.20, multiplied by the current hourly rates of the attorneys and other professionals equals \$154,737.00. These hours are broken down as follows:

<b>Attorneys (P=partner; A=associate)</b>	<b>Hours</b>	<b>Rate</b>	<b>Lodestar</b>
Janine L. Pollack (P)	192.60	\$795.00	\$153,117.00
Jeremy Francis (A)	3.6	\$450.00	\$1,620.00
<b>Total Attorneys: 2</b>			

<b>Paraprofessionals/Others</b>	<b>Hours</b>	<b>Rate</b>	<b>Lodestar</b>
<b>Total Paraprofessionals</b>			

**GRAND TOTAL TIME: 196.20**

6. In my judgment, and based on my years of experience in class action litigation and other litigation, the number of hours expended, and the services performed by my firm, were reasonable and necessary for my firm’s representation of Plaintiffs.

7. I have general familiarity with the range of hourly rates typically charged by plaintiffs’ class action counsel in the geographical area where my firm practices and throughout the United States, both on a current basis and historically. From that basis, I am able to conclude that the rates charged by my firm are within the range of market rates charged by attorneys and professional staff of equivalent experience, skill and expertise for legal services furnished in complex contingency class action litigation, such as this.

1           8. Attached hereto as **Exhibit B** is my firm’s resume including biographies of the  
 2 attorneys in the firm who were principally involved in this litigation. I believe that the skill and  
 3 experience described therein justify the rates charged. These rates have been approved by other  
 4 courts as reasonable for contingency representations similar to that here. *See, e.g., Luib v.*  
 5 *Henkel*, No. 1:17-cv-03021- BMC (E.D.N.Y. Aug. 19, 2019), ECF No. 60 (awarding requested  
 6 fees and costs); *Bokelman, et al., v. FCH Enterprises, Inc.*, Civil No. 18-00209 RJB-RLP (D.  
 7 Haw., May 3, 2019), ECF No. 58 (same); *Marasco v. American Expediting*, No. 16-cv-00232  
 8 (PKC) (JO) (E.D.N.Y. April 11, 2019), ECF No. 91 (same); *Patora v. Tarte, Inc.*, No. 7:18-cv-  
 9 11760-KMK (S.D.N.Y. January 29, 2020), ECF No. 50 (same); *Schmitt, et al. v. Younique, LLC*,  
 10 No. 8:17-cv-01397-JVS-JDE (C.D.C.A., April 9, 2020), ECF No. 272 (same).

11           9. The time described above does not include charges for expense items. Expense  
 12 items are billed separately, and such charges are not duplicated in my firm’s billing rates. Based  
 13 upon my firm records, my firm has incurred a total of \$836.87 in unreimbursed expenses in  
 14 connection with the prosecution of this litigation. The expenses are summarized as follows.

Expense Category	Total
Travel Expenses	\$836.87
<b>Total Expenses</b>	<b>\$836.87</b>

20           10. The expenses incurred in this action are reflected on the books and records of my  
 21 firm. These books and records are prepared from expense vouchers, check records, and other  
 22 source materials and are an accurate record of the expenses incurred. It is anticipated that costs  
 23 will continue to accrue, including but not limited to costs associated with traveling to the July 8,  
 24 2020 Final Approval Hearing in this matter as appropriate.

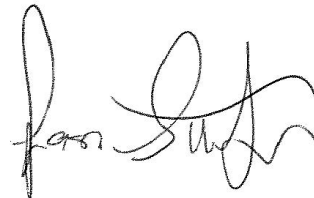
25           11. Attached hereto as **Exhibit C** is a detailed itemization and explanation for all  
 26 expenses stated above, describing the date, nature, and amount of each expense incurred. In  
 27 particular, for any travel expenses, Exhibit B states the mode of travel (e.g., by car, taxi, airplane,  
 28

1 etc.), the starting point, the destination, and the number of persons making the trip. For any  
2 expenses for overnight accommodations, Exhibit C states the necessity for staying overnight and  
3 the number of persons doing so.

4 12. My firm takes seriously its duty to supervise the claims administration process,  
5 and therefore I anticipate my firm might continue to incur additional lodestar and/or expenses in  
6 connection with this litigation through the end of the claims administration process as necessary.

7 I declare under penalty of perjury under the laws of the State of California that the  
8 foregoing is true and correct. Executed this 20<sup>th</sup> day of May, 2020 at Dutchess County, New  
9 York.

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Jason P. Sultzer

# **EXHIBIT A**

# Activities Export

05/20/2020

3:12 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/29/2020	 Unbilled	T/c's re: client signatures & sett. papers.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
04/27/2020	 Unbilled	Emails re: class member inquiries & sent to claims adm.; emails co-counsel re: sett. briefs.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
04/20/2020	 Unbilled	Emails re: class member corres. & t/c & email class member re: sett.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
04/13/2020	 Unbilled	Emails re: making spread sheet for call backs to class members.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
04/10/2020	 Unbilled	Emails re: sett. notice inquiries.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
04/09/2020	 Unbilled	Finalized notice & website.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
04/08/2020	 Unbilled	Reviewed notice & website &	52646.00005	Janine	2.40h	795.00	-	1,908.00
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

05/20/2020

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		emails re: same; t/c def. counsel. ● Unbilled	HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Pollack				
04/07/2020	⌵	Emails re: sett. issues, including notice & website. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
03/26/2020	⌵	Emails re: Amendment & filing w/ court & finalize same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
03/25/2020	⌵	Emails re: amendment to the sett. agr.; emails re: notice issues; reviewed draft of amendment. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
03/24/2020	⌵	Emails & t/c's re: funding of sett. & preparing website & notice. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
03/23/2020	⌵	Emails w/claims admin. re: website; emails w/deft re: same & re: funding of sett.; emails w/co- counsel re: settlement. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	2.10h	795.00	-	1,669.50
03/10/2020	⌵	Emails re: class list from def't to claims administrator.	52646.00005 HERO Loan litigation/	Janine Pollack	0.60h	795.00	-	477.00
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h



# Activities Export

05/20/2020

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Renovate America (3 cases consolidated by court) (CASE 1)					
03/09/2020	🕒	Emails re: signing of agreement as amended & sett. issues. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
03/03/2020	🕒	Worked on timeline & emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
02/28/2020	🕒	Emails re: prelim. approval order & calculated dates for sett. activities. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.20h	795.00	-	954.00
02/12/2020	🕒	Emails re: follow-up to court on order; sent amended sett. papers to former intervenors. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
02/06/2020	🕒	Reviewed Prelim. Approval Order for filing & emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
02/05/2020	🕒	Emails re: execution of amended sett. agreement & filing of Prelim. Approval order; t/c sett.	52646.00005 HERO Loan litigation/ Renovate America (3 cases	Janine Pollack	0.90h	795.00	-	715.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

05/20/2020

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		administrator. ● Unbilled	consolidated by court) (CASE 1)					
02/04/2020	⌚	Reviewed revised sett. agr. docs & emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
01/22/2020	⌚	Reviewed tentative ruling & emails w/all counsel re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
01/21/2020	⌚	Emails re: poss. objector & t/c's re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
01/15/2020	⌚	Finalized all supp. materials for filing re: sett.; t/c intervenor; emails. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	3.00h	795.00	-	2,385.00
01/14/2020	⌚	Continued work on & emails related to supp. papers re: settlement. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
01/13/2020	⌚	Continued prep of supp. submission for settlement docs.; emails re: release and edits to docs.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court)	Janine Pollack	1.20h	795.00	-	954.00
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

05/20/2020







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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	(CASE 1)					
01/10/2020	⌵	Worked on joint stip to court to amend sett. docs; emails re: same; reviewed draft from sett. administrator for Supp. Dec. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
01/09/2020	⌵	Reviewed draft of revised sett. papers & emails re: same; reviewed emails from intervenor. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
01/08/2020	⌵	Prep. for call w/intervenor; call w/ intervenor; emails re: new release language & supp. filing. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
01/07/2020	⌵	Emails re: review of amended release. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
01/02/2020	⌵	Reviewed intervention materials & conf. call re: same w/Renovate; emails re: supp. to court re: sett.; emails w/intervenor's counsel. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.20h	795.00	-	954.00
12/19/2019	⌵	Reviewed draft stip re: hearings; emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court)	Janine Pollack	0.90h	795.00	-	715.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
(CASE 1)								
12/17/2019	 ● Unbilled	Worked on fixing settlement documents as instructed by Court; sent to claims administrator; emails w/deft re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	2.40h	795.00	-	1,908.00
12/16/2019	 ● Unbilled	Reviewed tentative ruling from court; t/c's & emails re: same; traveled to airport (aborted flight due to tentative and adjourned hearing).	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	3.60h	795.00	-	2,862.00
12/13/2019	 ● Unbilled	Prep. for travel to hearing; emails w/deft.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
11/22/2019	 ● Unbilled	Emails & t/c co-counsel re: further hearing prep for prelim. approval.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
11/21/2019	 ● Unbilled	T/c's & emails re: prep for hearing on prelim. approval for sett.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
11/13/2019	 ● Unbilled	Finalized all sett. papers for filing; communications re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	2.10h	795.00	-	1,669.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

05/20/2020

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			consolidated by court) (CASE 1)					
11/12/2019		Continued work on sett. papers, briefs, declarations; emails re: sending agreement to clients for signature.  Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	5.10h	795.00	-	4,054.50
11/11/2019		Continued work on finalizing sett. docs & worked on Newman Dec. & brief; worked on stip re: page limits; t/c deft; t/c's co-counsel.  Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	3.30h	795.00	-	2,623.50
11/08/2019		Worked on edits to draft Dec.; emails re: same; emails with claims administrator & deft re: sett. issues.  Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.80h	795.00	-	1,431.00
11/06/2019		Emails re: finalizing sett. documents; call w/deft re: same.  Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.20h	795.00	-	954.00
11/01/2019		Did redlining on all sett. docs & sent to deft.  Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	3.60h	795.00	-	2,862.00
10/31/2019		Worked on drafts of sett. docs, including agreement, notice, order, final judgment; conf. call w/sett/	52646.00005 HERO Loan litigation/ Renovate America (3 cases	Janine Pollack	4.50h	795.00	-	3,577.50
					<b>196.20h</b>		<b>\$0.00</b> 0.0h	<b>\$154,737.00</b> 196.2h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		administrator. ● Unbilled	consolidated by court) (CASE 1)					
10/29/2019	⌚	Reviewed draft of Newman Dec. & t/c re: same; worked on draft of motion; emails def; emails with administrator. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	3.60h	795.00	-	2,862.00
10/28/2019	⌚	Worked on sett. papers & emails re: same; emails w/sett. administrator; t/c's re: sett. papers. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	2.10h	795.00	-	1,669.50
10/25/2019	⌚	Worked on joint CMR & emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
10/24/2019	⌚	T/c co-counsel to discuss m/prelim. approval & dec. of counsel; email def. counsel re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.20h	795.00	-	954.00
10/22/2019	⌚	Worked on m/prelim. approval; emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.20h	795.00	-	954.00
10/21/2019	⌚	Emails re: administrator estimates & prelim. approval motion. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

05/20/2020













3:12 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			consolidated by court) (CASE 1)					
10/11/2019	 ● Unbilled	Continued work on sett. issues & administrator bids; t/c's & emails re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
10/10/2019	 ● Unbilled	O/c's & t/c's & worked on administrator bids.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
10/07/2019	 ● Unbilled	Research for preliminary approval motion.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Jeremy Francis	3.60h	450.00	-	1,620.00
10/03/2019	 ● Unbilled	T/c & emails re: administrator bids.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
09/27/2019	 ● Unbilled	T/c's & emails re: administrator bids & reviewed same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
09/26/2019	 ● Unbilled	Worked on claims administrator bids & issues.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court)	Janine Pollack	0.90h	795.00	-	715.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

05/20/2020

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
(CASE 1)								
09/25/2019		Worked on issues for declarations and brief in support of prelim. approval; reviewed administrator bids; t/c's re: same. 	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	3.00h	795.00	-	2,385.00
09/24/2019		Continued work on draft of prelim. approval motion. 	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	4.50h	795.00	-	3,577.50
09/23/2019		Continued work on draft of prelim. approval motion; emails re: administrator bids & reviewed same. 	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	3.00h	795.00	-	2,385.00
09/20/2019		Worked on prelim. approval motion. 	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.80h	795.00	-	1,431.00
09/19/2019		T/c & emails re: administrator questions for bid & status conference. 	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
09/18/2019		Finalized status report; emails re: claims administration. 	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court)	Janine Pollack	0.60h	795.00	-	477.00
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h



# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
(CASE 1)								
09/17/2019		Emails regarding sending bids to claim administrators & status report to court/hearing.  Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.20h	795.00	-	954.00
09/13/2019		Met w/RN re: m/prelim. approval; emails re: same.  Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
09/11/2019		Emails with defendant re: prelim. approval & sett. agreement.  Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
09/03/2019		Emails re: sett. agreement draft & reviewed same; sent to defendant's counsel.  Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
08/30/2019		Continued work on sett. agreement; t/c Plaintiff simpson re: individual settlement for her and she approved it.  Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
08/29/2019		Worked on settlement agreement draft & emails re: same.  Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/27/2019	 ● Unbilled	Conf. call w/deft re: sett. agr; worked on edits of draft of same; emails w/plaintiff Simpson.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	2.10h	795.00	-	1,669.50
08/26/2019	 ● Unbilled	Conf. call w/deft; t/c's co-counsel to discuss changes to sett. agr.; emails re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	2.10h	795.00	-	1,669.50
08/22/2019	 ● Unbilled	Conf. calls, emails, t/c's re: sett. issues.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.80h	795.00	-	1,431.00
08/21/2019	 ● Unbilled	Emails discussing sett. issues, including QSF issues.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
08/20/2019	 ● Unbilled	Continued work on sett. agreement issues; t/c re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
08/19/2019	 ● Unbilled	Reviewed edits to injunctive relief language; emails re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
08/15/2019		Worked on edits to sett. agr.;	52646.00005	Janine	1.20h	795.00	-	954.00
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h
								12/26

# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		emails re: same. ● Unbilled	HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Pollack				
08/14/2019	⌚	Conf. calls re: sett. stip edits; t/c's & emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	3.90h	795.00	-	3,100.50
08/13/2019	⌚	T/c's & emails re: issues w/sett. agr. & reviewed. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	3.60h	795.00	-	2,862.00
08/12/2019	⌚	Worked on sett. issues; emails & t/ c's re: same; reviewed stip. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
08/09/2019	⌚	Worked on draft of objection & exclusion forms; worked on sett. agreement & exhibit drafts. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
08/08/2019	⌚	Continued work on sett. documents; worked on draft of objection form. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
08/07/2019	⌚	Emails & t/c's re: sett. agr. issues; conf. call w/deft; drafted objection	52646.00005 HERO Loan litigation/	Janine Pollack	1.50h	795.00	-	1,192.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		form. ● Unbilled	Renovate America (3 cases consolidated by court) (CASE 1)					
08/06/2019	⌚	Conf. call w/deft re: sett. agreement edits; t/c co-counsel re: same; reviewed same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
08/02/2019	⌚	Reviewed sett. agreement draft & email re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
07/24/2019	⌚	Finished work on draft sett. agr. & sent to defendant. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
07/18/2019	⌚	T/c & emails re: draft sett. agr.; worked on same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
07/15/2019	⌚	Worked on draft of settlement agreement & email re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.20h	795.00	-	954.00
07/08/2019	⌚	Emails re: adjournment of hearing & reviewed ct order re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			consolidated by court) (CASE 1)					
07/02/2019	 ● Unbilled	Emails re: filing of settl. notice & adjournment request.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
06/30/2019	 ● Unbilled	Reviewed draft of settl. agreement & email to co-counsel discussing issues with same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	2.40h	795.00	-	1,908.00
06/24/2019	 ● Unbilled	Reviewed notice of sett; emails re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
06/04/2019	 ● Unbilled	Emails to deft re: draft term sheet; emails co-counsel.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
06/03/2019	 ● Unbilled	Reviewed draft term sheet & emails re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
05/28/2019	 ● Unbilled	Worked on further edits to term sheet & sent to draft.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court)	Janine Pollack	0.60h	795.00	-	477.00
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
(CASE 1)								
05/24/2019	 ● Unbilled	Reviewed draft term sheet from deft & email re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
05/15/2019	 ● Unbilled	Reviewed proposed changes to application.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
05/03/2019	 ● Unbilled	Emails re: injunctive relief for settlement.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
04/26/2019	 ● Unbilled	Emails re: clients' approval of settlement.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
04/22/2019	 ● Unbilled	T/c's deft re: sett. negotiations & discussion re: motion to compel & discovery; emails re: same.; emails with client & other counsel re: settlement; worked on injunctive relief requests.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
04/18/2019	 ● Unbilled	T/c deft's counsel re: sett. negotiations & emails re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	consolidated by court) (CASE 1)					
04/17/2019	⌵	T/c deft. re: sett. negotiations & emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
04/15/2019	⌵	T/c deft; emails re: sett negotiations. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
04/11/2019	⌵	Emails; t/c deft re: sett. negotiations. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
04/09/2019	⌵	T/c deft's counsel re: sett. negotiations & emails co-counsel re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
04/05/2019	⌵	T/c deft re: sett.; emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
04/04/2019	⌵	T/c deft re: sett. negotiation; emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court)	Janine Pollack	0.30h	795.00	-	238.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
(CASE 1)								
04/03/2019	 ● Unbilled	T/c Sheldon re: sett. demand; emails re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
03/27/2019	 ● Unbilled	Emails re: hearing. (SB)	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
03/21/2019	 ● Unbilled	T/c deft re: negotiations & emails co-counsel.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
03/20/2019	 ● Unbilled	Negotiations for settlement with deft & emails re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
03/15/2019	 ● Unbilled	Emails re: settlement negotiations & t/c deft.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
03/14/2019	 ● Unbilled	Reviewed deft's doc responses in prep for call; meet & confer re: same; t/c deft re: settlement; emails re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	3.00h	795.00	-	2,385.00
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h
								18/26



# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/12/2019	 ● Unbilled	T/c Sheldon re: settlement & emails re: same w/co-counsel.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
03/07/2019	 ● Unbilled	Emails re: discovery responses & meet & confer.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
02/14/2019	 ● Unbilled	T/c's class members; emails.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
02/08/2019	 ● Unbilled	Emails re: discovery extension.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
01/11/2019	 ● Unbilled	Reviewed edited doc. request draft.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
01/07/2019	 ● Unbilled	Worked on doc. request draft; emails.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
12/18/2018	 ● Unbilled	Attended hearing by phone;	52646.00005	Janine	0.30h	795.00	-	238.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		emails. ● Unbilled	HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Pollack				
12/17/2018	⌚	Conf. call to prep. for hearing. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
12/14/2018	⌚	Emails re: court call & hearing prep; t/c court call. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
12/11/2018	⌚	Worked on finalizing CMS; emails; t/c Judge King. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.20h	795.00	-	954.00
12/10/2018	⌚	Worked on CMS draft; emails; t/c re: hearing. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
12/07/2018	⌚	Sent CMS draft to deft; emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
12/04/2018	⌚	Letter to deft re: mediation; worked on draft of CMS.	52646.00005 HERO Loan litigation/	Janine Pollack	0.90h	795.00	-	715.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Renovate America (3 cases consolidated by court) (CASE 1)					
12/03/2018	⌚	Draft of ltr to deft re: sett.; emails & t/c. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
11/30/2018	⌚	Call from deft's counsel re: settl. & emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
11/21/2018	⌚	Return to NYC. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	7.50h	795.00	-	5,962.50
11/20/2018	⌚	Attended mediation. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	6.60h	795.00	-	5,247.00
11/19/2018	⌚	Traveled to S.D. for mediation; mtgs. to prep. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	9.00h	795.00	-	7,155.00
11/16/2018	⌚	Prep for mediation; worked on draft mediation brief; t/c's re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	2.40h	795.00	-	1,908.00
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h
								21/26

# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			consolidated by court) (CASE 1)					
11/15/2018	 ● Unbilled	Emails re: mediation & mediation statement.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
11/14/2018	 ● Unbilled	Worked on draft of mediation statement;emails re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	3.30h	795.00	-	2,623.50
11/13/2018	 ● Unbilled	Emails & t/c's plaintiffs' & deft's counsel re: mediation issues.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.50h	795.00	-	1,192.50
11/12/2018	 ● Unbilled	Emails & t/c's re: sett. mediation prep/documents.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	1.20h	795.00	-	954.00
11/09/2018	 ● Unbilled	T/c's w/co-counsel to discuss sett. data in prep/ for mediation; email to deft. re: docs.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
11/09/2018	 ● Unbilled	T/c's w/co-counsel to discuss sett. data in prep/ for mediation; email to deft. re: docs.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
(CASE 1)								
11/08/2018	 	Reviewed admin. fee sett. data & emails re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
11/05/2018	 	Emails & t/c's re: travel to mediation & settlement data. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
10/31/2018	 	Emails re: settlement/mediation. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
10/30/2018	 	Emails re: mediation issues. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
10/29/2018	 	Emails re: mediation issues. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
10/24/2018	 	Emails re: mediation issues. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

05/20/2020

3:12 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/23/2018	 Unbilled	Emails re: new data & analyzed same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
10/22/2018	 Unbilled	Emails re: new recording fee data & reviewed same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
10/15/2018	 Unbilled	Emails w/deft re: mediation.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
10/12/2018	 Unbilled	Research re: mediator & emails re: same.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
10/10/2018	 Unbilled	Emails re: further sett. data & potential mediators.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
10/05/2018	 Unbilled	Emails re: research into poss. mediators.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
10/03/2018		Conf. call e/deft's counsel re:	52646.00005	Janine	0.30h	795.00	-	238.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h
								24/26

# Activities Export

05/20/2020




3:12 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		settlement. ● Unbilled	HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Pollack				
09/27/2018	⌚	Sett. call w/deft.; emails. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.60h	795.00	-	477.00
09/26/2018	⌚	Emails further explaining sett. data. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
09/25/2018	⌚	Emails re: sett. proposals. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
09/24/2018	⌚	T/c Sheldon re: sett. issues; met w/ Shalov & t/c Newman re: same. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
09/17/2018	⌚	Conf. call re: sett. docs/info; t/c's re: same; emails. ● Unbilled	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.90h	795.00	-	715.50
09/14/2018	⌚	Reviewed Sett. materials; emails. ● Unbilled	52646.00005 HERO Loan litigation/	Janine Pollack	0.30h	795.00	-	238.50
					<b>196.20h</b>		<b>\$0.00</b>	<b>\$154,737.00</b>
							0.0h	196.2h

# Activities Export

05/20/2020

3:12 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			Renovate America (3 cases consolidated by court) (CASE 1)					
09/06/2018	 ● Unbilled	T/c defendant's counsel re: discovery issues & settlement.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
09/05/2018	 ● Unbilled	Emails re: call w/deft to discuss sett. materials.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
09/04/2018	 ● Unbilled	Emails re: sett. materials.	52646.00005 HERO Loan litigation/ Renovate America (3 cases consolidated by court) (CASE 1)	Janine Pollack	0.30h	795.00	-	238.50
					<b>196.20h</b>		<b>\$0.00</b> 0.0h	<b>\$154,737.00</b> 196.2h



# **EXHIBIT B**



A Complex Litigation & Trial Practice

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The Sultzer Law Group, P.C. focuses on consumer class actions and other complex civil litigation. The firm is headquartered in Poughkeepsie, New York, and maintains offices in New York City, New Jersey, and Pennsylvania. Since its founding in 2013, The Sultzer Law Group, P.C. has served as lead counsel in numerous high-profile consumer class action cases. The firm is included in Martindale-Hubbell's Bar Register of Preeminent Lawyers for its class action practice. Jason Sultzer and Joseph Lipari are AV rated by Martindale-Hubbell and have been selected as Super Lawyers. In addition, they have both been selected as the American Law Media's Mass Tort Lawyer of the Year. The firm's founding partner, Mr. Sultzer, has earned selection as a Fellow of the Litigation Counsel of America (LCA), recognizing the country's top trial attorneys. Mr. Sultzer has also been named in Lawdragon's list of 500 Leading Plaintiff Financial Lawyers for 2019. The firm's attorneys have contributed to or been featured in various well-known publications regarding their class action practice, including: *Law360*, *Inside Counsel Magazine*, *Risk Management Magazine*, and *CNBC News*. More detail about the firm, its practice areas, and its attorneys appear on its website: [www.thesultzerlawgroup.com](http://www.thesultzerlawgroup.com)

## I. Representative Practice Areas

### Class Action Litigation

Attorneys at The Sultzer Law Group, P.C. have advocated for consumers' and workers' rights, successfully challenging some of the nation's largest and most powerful corporations for a variety of improper, unfair, and deceptive business practices in a wide range of industries including, the auto, financial, cosmetic, food, and supplement industries. Through our efforts, we have recovered significant benefits for our consumer clients.

Recent Representative matters include:

- *Patora v. Tarte, Inc.*, Case No. 7:18-cv-11760-KMK (S.D.N.Y.) (served as lead counsel and obtained a settlement fund of \$1.7 million on behalf of a national class of consumers who purchased cleaning products deceptively marketed as "Natural")
- *Luib, Tony, et al., v. Henkel Consumer Goods Inc.*, Case No. 17-cv-03021 (E.D.N.Y.) (served as co-lead counsel and obtained a settlement fund of \$1.5 million on behalf of a national class of consumers who purchased cleaning products deceptively marketed as "Natural")
- *Vincent, Wesley, et al. v People Against Dirty, PBC. and Method Products, PBC.*, Case No. 7:16-cv-06936 (S.D.N.Y.) (served as co-lead counsel and obtained a settlement fund of \$2.8 million on behalf of a national class of consumers who purchased cleaning products deceptively marketed as "Natural")

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- *Run Them Sweet, LLC v. CPA Global, Ltd., et al*, Case No. 1:16-cv-1347 (E.D. VA.) (served as co-lead counsel and obtained a settlement fund of \$5.6 million on behalf of consumers who were overcharged with respect to foreign patent renewal services)
- *Mizrahi v. National Board of Examiners in Optometry, Inc.*, No. 16-cv-03146-JKB (D. Md.) and *Brenda Liang, et al., v. National Board of Examiners in Optometry, Inc.*, No. 17-cv-1964-JKB (D. Md.) (served as co-lead counsel in data breach action establishing settlement fund of \$3.25 million on behalf of optometry students who had their personal information exposed)
- *Rapoport-Hecht, Tziva et al. v. Seventh Generation, Inc.*, Case No. 14-cv-9087 (S.D.N.Y.) (served as co-lead counsel and obtained a settlement fund of \$4.5 million on behalf of a national class of consumers who purchased cleaning products deceptively marketed as “Natural”)
- *Foster, Andrew Tyler et al. v. L-3 Communications EOTECH, Inc., et al.*, Case No. 15-cv-03519 (W.D. Mo.) (served as co-lead counsel and obtained millions of dollars in monetary relief for consumers who purchased falsely advertised holographic weapons sights)
- *Davenport, Sumner, et al. v. Discover Financial Services, et al.*, Case No. 15-cv-06052 (N.D. Ill) (served as co-lead counsel and obtained a settlement fund of \$5.6 million for victims of violations of the Telephone Consumer Protection Act)
- *Baumgarten v. Cleanwell, LLC*, Case No. 1:16-cv-01780 (E.D.N.Y.) (served as lead counsel and obtained injunctive relief on behalf of a national class of consumers against company that deceptively marked cleaning products as “Natural”)
- *Nicotra, Jennifer et al. v. Babo Botanicals, LLC*, Case No. 16-cv-00296 (E.D.N.Y.) (served as lead counsel and obtained injunctive relief on behalf of a national class of consumers against company that deceptively marked skin and haircare products as “Natural”)
- *Mayhew, Tanya, et al., v. KAS Direct, LLC and S.C. Johnson & Son, Inc.*, Case No. 16-cv-6981 (S.D.N.Y.) (served as co-lead counsel and obtained a settlement fund of \$2.2 million on behalf of a national class of consumers who purchased baby products deceptively marketed as “Organic”)
- *Griffin, Anthony, et al., v. Aldi, Inc., Doe Defendants 1-10*, Case No. 16-cv-00354 (N.D.N.Y.) (served as co-lead counsel and obtained a settlement fund of \$9.8 million on behalf of a national and NY class of employees who were not paid for all of the hours they worked and who did not receive appropriate overtime under Federal and NY Law)
- *Schmitt, et al. v. Younique, LLC*, No. 8:17-cv-01397-JVS-JDE (C.D.C.A., April 9, 2020), ECF No. 272 (served as co-lead counsel and obtained a settlement fund of \$3.25 million on behalf of consumers involving allegedly deceptive labeling of consumer products.)



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## Commercial Litigation

Attorneys at The Sultz Law Group, P.C. handle high-stakes commercial cases for both plaintiffs and defendants. We specialize in significant liability exposure involving issues such as business torts, intellectual property matters in which we have pursued and defended against patent and trademark infringement claims, breach of contract, UCC sale of goods, predatory lending, misappropriation of trade secrets/customers, fraud, unfair competition, breach of fiduciary duty, conversion, business transactions, and land use actions. We have successfully represented municipalities as well as companies and individuals in a wide range of industries, including real estate, telecommunications, retail, manufacturing, construction, and alarm/emergency response systems. As a result of our aggressive representation, we have recovered millions of dollars on behalf of clients embroiled in contentious business disputes.

Recent representative matters include:

- *Fair Housing Justice Center, Inc., et al., v. Ulster Savings Bank*, Case No. 16-cv-8608 (S.D.N.Y.)
- *Federal Trade Commission et al. v. Lifewatch Inc. et al.*, Case No. 15-cv-05781 (N.D. Ill.)
- *Life Alert Emergency Response, Inc. v. Lifewatch, Inc.*, Case No.2:08-cv-02184-CAS (FFMx) (C.D. Cal)
- *Scanner Guard Corporation v. Excelsis Investments, Inc. et al.*, Case No. 16-cv-00516 (E.D. Pa.)
- *101 Imaging LLC DBA Acuscan v. Dr. Rossi, MD., P.C. et al.*, Case No. 601008/2014 (New York Supreme Court, Nassau County)
- *Asset Enhancement Solutions, LLC v. Lifewatch, Inc.*, Case No. 601542/2014 (New York Supreme Court, Nassau County)
- *Brune & Richard LLP v. Daniel Beyda et al.*, Case No. 650443/2015 (New York Supreme Court, New York County)
- *CDP Holdings Group, LLC v. Daniel Beyda*, Case No. 650261/2016 (New York Supreme Court, New York County)
- *Daniel Beyda v. Daniel DiPietro et al.*, Case No. 600916/2015 (New York Supreme Court, Nassau County)
- *Dover Madison Capital Management LLC v. Clearwater Systems Corp. et al.*, Case No. 652315/2015 (New York Supreme Court, New York County)
- *Eddie Sitt, individually and derivatively and on behalf of Sitt Asset Management LLC and Sitt Leasing, LLC v. Ralph Sitt et al.*, Case No. 652490/2016 (New York Supreme Court, New York County)



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- *Enterprise Radiology, P.C. d/b/a Washington Heights Imaging v. CDP Holdings Group, LLC et al.*, Case No. 601786/2015 (New York Supreme Court, Nassau County)
- *Lease-It Capital Corp. d/b/a Acculease v. I.M.S./Imaging Medical Solutions, Inc. et al.*, Case No. 151316/2015 (New York Supreme Court, New York County)
- *Long Island Radiology Associates, P.C. v. Daniel Beyda M.D. et al.*, Case No. 602572/2015 (New York Supreme Court, Nassau County)
- *Walker Winslow Group, LLC d/b/a Paradigm Health Plans v. Ross Krasnow, et al.*, Case No. 14-cv-7772 (D.N.J.)

## **Personal Injury Litigation**

Attorneys at The Sultz Law Group, P.C. have extensive experience representing individuals in various types of personal injury actions, including cases involving brain injuries, trucking accidents and wrongful death claims. The Firm has successfully recovered tens of millions of dollars for clients through pre-trial resolutions and trial verdicts.

## **Mass Tort Litigation**

Attorneys at The Sultz Law Group, P.C. have successfully defended and prosecuted cases involving mass toxic tort cases docketed throughout the United States. Our cases have ranged from single- plaintiff, single-defendant, and single-product claims of personal injury to matters which involved hundreds of plaintiffs and hundreds of products.

## **II. Partner Biographies**

### **Jason P. Sultz**

Jason P. Sultz is a nationally recognized trial lawyer and the founding partner of The Sultz Law Group P.C. He represents clients throughout the United States in high profile litigations and has substantial experience in class actions, mass torts, business disputes, personal injury litigation, product liability, and intellectual property-related issues.

Mr. Sultz has successfully defended and prosecuted nationally recognized companies in highly publicized class action lawsuits in state and federal courts, including proceedings before the Judicial Panel on Multidistrict Litigation. These class actions involved a wide variety of matters, including unfair competition, breach of warranty, product-related issues, employment discrimination, civil rights, overtime wages, the Fair Debt Collection Practices Act, abusive mortgage lending practices, The Telephone Consumer Protection Act, and consumer protection statutes of nearly all fifty states. Mr. Sultz has been appointed as lead counsel in a number of class action lawsuits in which he has recovered millions of dollars and obtained injunctive relief



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on behalf of aggrieved consumers nationwide in cases involving fraudulent representations of various foods and products.

Mr. Sultzer is a frequent author and lecturer about class action lawsuits and has been quoted in national publications concerning the Class Action Fairness Act and class action settlements.

Mr. Sultzer also routinely litigates matters involving complex commercial disputes. He represents both plaintiffs and defendants in these cases. These matters include contractual disputes, business fraud, predatory lending, misappropriation of trade secrets/customers, land use actions, breach of fiduciary duty, and unfair competition. These clients have been engaged in the real estate, retail, financial, telecommunications, construction, medical and manufacturing industries. Most recently, Mr. Sultzer obtained injunctive relief on behalf of one of the largest real estate developers in New York City in a multi-million dollar lawsuit involving various properties.

Mr. Sultzer also has successfully litigated hundreds of product liability cases involving a wide range of products, including catastrophic injury and wrongful death matters resulting from fires and electrocutions. Most recently, Mr. Sultzer conducted a trial in which the court returned a favorable verdict in favor of his client, the defendant, in a case involving allegations that his client's product caused a fire and property damage in excess of \$10 million.

Additionally, Mr. Sultzer has extensive experience in mass tort cases, including those involving asbestos and the alleged health effects of cell phone use. Given Mr. Sultzer's significant experience in mass tort matters, he regularly advises his clients during corporate crisis situations associated with product recalls, federal agency investigations, state attorney general inquiries, and mass tort and class action litigation threats.

Mr. Sultzer also represents individual plaintiffs in catastrophic personal injury cases. Most recently, on the eve of trial, Mr. Sultzer obtained over \$2.5 million on behalf of his client who was severely injured in an auto-related accident.

Prior to opening The Sultzer Law Group P.C., Mr. Sultzer was the youngest equity partner at one of the largest law firms in the country where he served as the co-chairman of its class action practice group. Earlier in his career, Mr. Sultzer was in-house counsel for Owens Corning, a Fortune 500 Company, where he was involved in defending the company against tens of thousands of asbestos lawsuits throughout the country.



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Mr. Sultzer has received the Martindale-Hubbell AV rating, indicating that his legal peers rank him at the highest level of professional excellence. He was also named as a “Mass Tort Lawyer of the Year” by American Law Media, has been recognized as a Super Lawyer for the last seven years, and was selected for Lawdragon’s list of 500 Leading Plaintiff Financial Lawyers for 2019. Mr. Sultzer, was also featured on the front cover of the Wall Street Journal’s Legal Leader’s magazine in 2014 and 2015 designating him as one of New York’s top rated lawyers. In addition, Mr. Sultzer has earned selection as a Fellow of the Litigation Counsel of America (LCA), recognizing the country’s top trial attorneys. The LCA is an invitation-only honorary society that is composed of less than one-half of one percent of American lawyers.

### **Adam Gonnelli**

Mr. Gonnelli is a partner at The Sultz Law Group, P.C. Throughout his career, Mr. Gonnelli has served as lead or co-lead counsel in numerous high-profile class action cases throughout the country resulting in multi-million dollar recoveries to consumers, employees, and investors. Mr. Gonnelli concentrates his practice on consumer fraud class actions, wage and hour litigation, and transactional/commercial litigation. Some of his representative cases include *Guttentag v. Ruby Tuesday*, Case No. 1:12-cv-03041 (S.D.N.Y.) (\$3 million recovery for employees in FLSA wage suit); *In re NutraQuest, Inc.*, No. 06-202 (D.N.J.) (consumer fraud case against national diet supplement company); *Wanzo v. Nextel Commc 'ns, Inc.*, No. GIC 791626 (Cal. Sup. Ct.) (consumer case challenging change in “nights and weekends” plan); *Rice v. Lafarge North America*, No. 268974 (Md. Cir. Ct.) (merger case resulted in a benefit of \$388 million); *In re Fox Entm't Group, Inc. S'holders Litig.*, No. 1033-N (Del. Ch. 2005) (benefit to shareholders of \$450 million); *Foster v. L-3 Communications EOTECH, Inc.*, Case No. 15-cv-03519 (W.D. Mo.) (obtained monetary recovery for consumers who purchased falsely advertised holographic weapons sights); and *Run Them Sweet, LLC v. CPA Global Limited, et al.*, Case No. 16-cv-1347 (E.D. Va.) (obtained settlement fund of \$5,600,000 for consumers who were overcharged with respect to foreign patent renewal services).

While attending Cornell Law School, Mr. Gonnelli served as Editor-in-Chief of the Cornell Journal of Law and Public Policy and was a member of the Atlantic Regional Championship moot court team in the Jessup International Law Moot Court Competition (1997). At Rutgers University, Mr. Gonnelli lettered in football and fencing and served as Student Government President.

Prior to joining The Sultz Law Group, Mr. Gonnelli was a partner at a national plaintiff class action law firm where he served as the chairman of its Wage Theft Practice Group. Before attending Law School, Mr. Gonnelli was a Financial Writer at the Federal Reserve Bank of New York, where he wrote educational materials on international trade and monetary policy.





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## Joseph Lipari

Joseph Lipari has litigated in state and federal courts throughout the United States, and he has appeared before binding arbitration panels. Mr. Lipari has achieved numerous successful outcomes as counsel for plaintiffs and defendants, including verdicts and settlements.

He has successfully represented businesses in complex suits arising out of high-profile, catastrophic events including: underground mining accidents in Alabama; steel mill explosions in Pennsylvania and Louisiana; and extended unplanned shutdowns and outages in mills, plants, and factories located across the United States and abroad.

Mr. Lipari was featured in *Law360* for a defense verdict he obtained on behalf of his manufacturer client. *See Moyer v. Siemens VAI Services and Signal Metal Industries, Inc.*, No. 2:11-cv-03185 (E.D. La.) (Louisiana jury found defendant was not liable for \$2.6 million wrongful death award following a deadly molten steel eruption allegedly linked to equipment designed by the company's predecessor).

Mr. Lipari has created significant caselaw regarding the use of the term "Natural" in product labeling and advertising. *See, e.g., Silva, Christopher et al. v. Smucker Natural Foods, Inc. and J.M. Smucker Co.*, 14-cv-6154 (E.D.N.Y.); *Sitt v. Nature's Bounty, Inc. et al.*, 15-cv-04199 (S.D.N.Y.).

He is admitted to the bars of New York, Pennsylvania, and New Jersey. He has also appeared as counsel, by way of *pro hac vice* admission, in over twenty states. Mr. Lipari has lectured and published on topics including trial strategy, patent disputes, hydrofracking in the Marcellus Shale, and risk management practices.

Mr. Lipari is a 2002 graduate of Seton Hall University School of Law. Before law school, he attended Officer Candidate School in Quantico, Virginia, and was offered a commission as Second Lieutenant in the United States Marine Corps.

Prior to joining The Sultz Law Group P.C., Mr. Lipari was a partner at a prominent national litigation firm. Earlier in his career, he was associated with one of the largest law firms in the country.

Mr. Lipari has received the Martindale-Hubbell AV rating, indicating that his legal peers rank him at the highest level of professional excellence. He was also named as a "Mass Tort Lawyer of the Year" by American Law Media, and has been recognized as a Super Lawyer.





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### **III. Associate Biographies**

#### **Jeremy Francis**

Mr. Francis is an associate at The Sultzer Law Group. His practice focuses on commercial litigation and consumer class actions.

Prior to joining The Sultzer Law Group P.C., Mr. Francis was an Assistant District Attorney in the Kings County District Attorney's Office, where he prosecuted misdemeanor and felony cases, including driving while intoxicated, narcotics, gun possession, and assault. He tried close to a dozen cases and secured guilty verdicts in Kings County Criminal Court. Subsequently, Mr. Francis was associated with a firm specializing in traumatic brain injury cases.

Mr. Francis interned for the Honorable Kiyoo A. Matsumoto in the Eastern District of New York and gained experience drafting opinions concerning a wide range of federal issues. As an intern for the United States Attorney's Office in the Eastern District of New York, he played an integral role in securing convictions in a RICO murder re-trial involving complex issues of expert testimony admissibility.

Mr. Francis attended Yale University, where he graduated with honors in Political Science. He is a 2011 graduate of Vanderbilt University Law School, where he was an Articles Editor of the Vanderbilt Journal of Entertainment and Technology Law. His article, "The Kindle Controversy: An Economic Analysis of How the Amazon Kindle's Text-to-Speech Feature Violates Copyright Law" was published in the Fall of 2011.

# **EXHIBIT C**

	A	B	C	D	E
1					
2	<i>In re: Renovate America Finance Cases</i>				
3	<b>Expenses Detail</b>				
4					
5	<b>DATE</b>	<b>NATURE</b>	<b>If travel, state mode (car, taxi, plane, etc.), starting point, destination, # of people on trip</b>	<b>If overnight, state necessity for and # of people staying overnight</b>	<b>AMOUNT</b>
6	11/19/2018	Flight Travel	Plane - 1 Person - Newark, NJ to San Diego, CA		\$629.40
7	11/19/2018	Hotel Stay		Hotel - 1 Person - Mediation	\$179.45
8	11/20/2018	Car Travel	Car - 1 Person - Hotel to Mediation		\$6.50
9	11/19/2018	Car Travel	Car - 1 Person - Airport to Hotel		\$21.10
10	11/21/2018	Car Travel	Car - 1 Person - Newark Airport to 200 Riverside Blvd.		\$74.90
11	11/19/2018	Car Travel	Car - 1 Person - 200 Riverside Blvd. to Newark Airport		\$80.90
12	11/19/2018	Meal			\$67.29
13	12/14/2018	Court Call Fee			\$86.00
14	12/16/2019	Flight Travel	Plane - 1 Person - Newark, NJ to Los Angeles, CA		\$336.60
15	12/16/2019	Car Travel	Car - 1 Person - 200 Riverside Blvd. to Newark Airport		\$72.42
16	12/16/2019	Car Travel	Car - 1 Person - Return to 200 Riverside Blvd.		\$45.99
17					
18					
19					
20					
21					
22					
23					
24					
25				<b>TOTAL</b>	<b>\$1,600.55</b>