

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

COOPER MOORE and ANDREW
GILLETTE, on their own behalf and on
behalf of all others similarly situated,

Plaintiffs,

v.

ROBINHOOD FINANCIAL LLC, a
Delaware limited liability company,

Defendant.

Case No. 2:21-cv-01571-BJR

**DECLARATION OF BETH E.
TERRELL IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS AND
EXPENSES, AND SERVICE
AWARDS**

I, Beth E. Terrell, declare as follows:

1. I am a member of the law firm of Terrell Marshall Law Group PLLC and co-counsel of record for Plaintiffs in this matter. I am admitted to practice before this Court and am a member in good standing of the bar of the state of Washington. I respectfully submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees, Costs and Expenses, and Service Awards. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

Our Work on the Case

2. Plaintiff Cooper Moore filed the initial complaint on August 9, 2021, in the U.S. District Court for the Northern District of California on behalf of a proposed class of similarly situated individuals, alleging that Robinhood violated the Washington Commercial Electronic Mail Act, RCW 19.190, et seq. ("CEMA") and the Washington Consumer Protection Act, RCW

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1 19.86, et seq. (“CPA”) by assisting its users to send unsolicited advertising text messages to
2 Washington residents through the Robinhood referral program. Our firm researched Plaintiff
3 Moore’s potential claims and issues involving jurisdiction and venue. We also worked with co-
4 counsel to investigate the facts and draft the complaint, which we initially filed in the Northern
5 District of California.

6 3. Robinhood moved to dismiss for failure to state a claim and moved to transfer the
7 case to the Western District of Washington. Our firm took the lead on the response to the motion
8 to dismiss and assisted with the motion to transfer venue. The court ultimately deferred ruling on
9 the motion to dismiss and transferred the case to this Court.

10 4. Plaintiff Moore filed an amended complaint that added Andrew Gillette as a
11 named Plaintiff. Our firm worked with co-counsel to analyze and research issues relating to the
12 amended complaint and assisted in drafting it. Robinhood moved to dismiss the Amended
13 Complaint and our firm, together with co-counsel, met and conferred with Robinhood’s counsel
14 about the motion and assisted with the response, which was denied. See ECF 63 (Order Denying
15 Motion to Dismiss).

16 5. Our firm was actively involved in pursuing the substantial discovery necessary to
17 prosecute the individual and class claims asserted in this action. We assisted in propounding five
18 sets of requests for production, five sets of interrogatories, and requests for admissions on
19 Robinhood. Together with co-counsel, we met and conferred with Robinhood about its request
20 for a complete stay of discovery while the motion to dismiss was pending and participated in the
21 telephonic hearing with the Court.

22 6. After the motion to dismiss was denied, our firm participated in numerous meet-
23 and-confer sessions with Robinhood’s counsel about the scope of discovery. Plaintiffs were
24 forced to move to compel discovery responses, which the Court granted in part. In addition to
25 over 30,000 pages of documents, Robinhood ultimately produced extensive sample data related
26 to the referral program. Plaintiffs responded to, and supplemented their responses to, two sets of

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1 requests for production, two sets of interrogatories, and one set of requests for admissions, and
2 produced over 1,000 pages of documents. Plaintiffs took two Rule 30(b)(6) depositions of
3 Robinhood representatives. Our firm was involved every step along the way.

4 7. Robinhood made individual settlement offers to the two named Plaintiffs, stating
5 in the offer letters that if the named Plaintiffs did not accept the offers they would be responsible
6 for paying Robinhood's counsel's fees and costs defending the action under Washington's small
7 claims statute. Robinhood suggested that this fee-shifting applies even though this is a class
8 action with an amount in controversy in the millions of dollars. Our firm assigned a summer
9 associate to research this issue, which she did.

10 8. The parties engaged in extensive third-party discovery. Robinhood sent subpoenas
11 to the two individuals who sent Plaintiffs Moore and Gillette the text messages. My partner
12 Jennifer Murray attended those depositions. Robinhood also issued a subpoena to the operator of
13 classaction.org seeking documents related to the initiation of Plaintiffs' retainment of their
14 counsel, which Plaintiffs and their counsel successfully moved to quash. *See Moore v.*
15 *Robinhood Fin. LLC*, No. 23-mc-76 (S.D.N.Y. April 26, 2023), ECF No. 24. Plaintiffs
16 subpoenaed one of Robinhood's vendors for relevant data. The parties also issued subpoenas to
17 several cell providers for data and documents, including Consumer Cellular, Verizon, AT&T,
18 and Branch Metrics.

19 9. Ms. Murray defended Plaintiff Moore and Gillette's depositions. Robinhood
20 insisted that the depositions occur in person in their Seattle offices, requiring Plaintiff Gillette to
21 travel over five hours each way to appear, which he did. Our firm also worked with co-counsel to
22 obtain documents and electronic data responsive to Robinhood's extensive discovery requests to
23 each named Plaintiff.

24 10. Our firm also took the lead on working with an expert to process and analyze the
25 data Robinhood produced and complete his expert report. That work was essential in laying the
26 groundwork for mediation and, ultimately, settlement.

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1 11. Ms. Murray attended the mediation with Robert Meyer in Los Angeles and our
2 firm took an active role in negotiating and finalizing the Settlement Agreement and proposed
3 notices, hiring a settlement administrator, and drafting the preliminary approval motion. These
4 post-mediation efforts took several weeks.

5 **Terrell Marshall's Experience**

6 12. Terrell Marshall is a law firm in Seattle, Washington, that focuses on complex
7 civil and commercial litigation with an emphasis on consumer protection, product defect, civil
8 rights, and wage and hour cases. Terrell Marshall has been appointed lead or co-lead counsel
9 representing multi-state and nationwide classes in state and federal court in Washington and
10 throughout the United States. Since its founding in 2008, the attorneys at Terrell Marshall have
11 represented scores of classes, tried class actions in state and federal court, and obtained hundreds
12 of millions of dollars in monetary relief to workers, consumers, and other individuals.

13 13. In December 2023 after a six-week trial, Terrell Marshall obtained a nearly \$16.7
14 million jury verdict on behalf of five current and former University of Washington police
15 officers who experienced a hostile work environment and race discrimination while employed at
16 the University. On March 8, 2024, the court entered a total judgment of over \$25,664,159. The
17 University has appealed.

18 14. Terrell Marshall has successfully litigated class action lawsuits under the
19 Telephone Consumer Protection Act. Terrell Marshall has taken the lead in some of the largest
20 nationwide class actions filed under the TCPA, including those filed against large financial
21 institutions such as Sallie Mae, Bank of America, Discover Financial Services, Capital One, and
22 HSBC. I have been appointed co-lead counsel in two of the largest MDLs involving TCPA
23 claims, *In re Capital One Telephone Consumer Protection Act Litigation*, 1:12-cv-10064 (N.D.
24 Illinois), and *In re Monitronics International, Inc. Telephone Consumer Protection Act*
25 *Litigation*, MDL No. 1:13-MD-2493 (N.D. W. Va.).

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1 15. Terrell Marshall is litigating or has litigated to successful completion the
2 following TCPA class actions:

- 3 a. *Williams v. PillPack LLC*—Filed in 2019 on behalf of
4 consumers who received calls selling pharmacy services on their
5 cell phones and residential telephones without their prior express
6 consent. The Western District of Washington denied a defense
7 motion for summary judgment and certified a class for litigation.
8
9 b. *Samson v. United Healthcare Services, Inc.*—Filed in 2019 on
10 behalf of consumers who received calls about health insurance
11 even after the consumers told the defendant to stop calling or
12 that it had the wrong number. The Western District of
13 Washington certified a wrong number and a do-not-call class for
14 litigation.
15
16 c. *Abante Rooter & Plumbing, Inc. v. Alarm.com Inc.*—Filed in
17 2015 on behalf of consumers who received solicitation calls on
18 their cellular and residential telephones without their prior
19 express consent. The Northern District of California granted
20 final approval of the \$28 million settlement on August 15, 2019.
21
22 d. *Borecki v. Raymours Furniture Co., Inc.*—Filed in 2017 on
23 behalf of consumers who received spam text messages on their
24 cellular telephones without their prior express consent. The
25 Southern District of New York granted final approval of the
26 \$4.25 million settlement on September 10, 2019.
27
28 e. *Snyder v. Ocwen Loan Servicing, LLC*—Filed in 2014 on behalf
29 of consumers who received automated collection calls on their
30 cellular telephones without their prior express consent. The
31 Northern District of Illinois granted final approval of the \$21.5
32 million settlement on May 14, 2019.
33
34 f. *Melito v. American Eagle Outfitters, Inc.*—Filed in 2014 on
35 behalf of consumers who received spam text messages on their
36 cellular telephones without their prior express consent. The
37 Southern District of New York granted final approval to the
38 \$14.5 million settlement on September 11, 2017, which the
39 Second Circuit affirmed on April 30, 2019.
40
41 g. *In re Capital One Telephone Consumer Protection Act*
42 *Litigation*—Filed in 2012 on behalf of consumers who received
43 automated, prerecorded collection calls on their cellular
44 telephones without their prior express consent. Terrell Marshall

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1 served as co-lead counsel in the multidistrict litigation. The
2 Northern District of Illinois granted final approval of the \$75
million settlement on February 23, 2015.

- 3 h. *In re Monitronics International, Inc. Telephone Consumer*
4 *Protection Act Litigation*—Filed in 2011 on behalf consumers
5 who received automated, prerecorded solicitation calls on their
6 residential and telephones without their prior express consent.
7 Terrell Marshall served as co-lead counsel in the multidistrict
litigation. The Northern District of West Virginia granted final
approval of the \$28 million settlement on June 12, 2018.
- 8 i. *Ashack v. Caliber Home Loans*—Filed in 2015 on behalf of
9 consumers who received automated, prerecorded collection
10 telephone calls on their cellular telephones without their prior
11 express consent within the meaning of the Telephone Consumer
Protection Act, 47 U.S.C. § 227 et seq. Terrell Marshall
negotiated a settlement in 2016 for \$2,895,000, and final
approval was granted in June 2017.
- 12 j. *Abante Rooter & Plumbing, Inc. v. Pivotal Payments Inc.*—
13 Filed in 2016 on behalf of consumers that received automated
14 solicitation telephone calls to their cell phones without their
15 prior express consent. The Northern District of California
granted final approval of the \$9 million settlement on October
15, 2018.
- 16 k. *Charvat v. Plymouth Rock Energy*—Filed in 2015 on behalf of
17 consumers who received automated solicitation telephone calls
18 on their cellular and residential telephones without their prior
19 express consent within the meaning of the Telephone Consumer
20 Protection Act, 47 U.S.C. § 227 et seq. and/or to telephone
numbers registered on the National-Do-Not-Call Registry. The
case settled on a class wide basis and a final judgment was
entered in 2018.
- 21 l. *Wilkins v. HSBC Bank Nevada, N.A.*—Filed in 2014 on behalf of
22 individuals who received prerecorded calls using an automatic
23 dialing system without their prior consent. The Northern District
of Illinois granted final approval of the \$39.9 million settlement
24 on March 17, 2015.
- 25 m. *Booth v. Appstack, Inc.*—Filed in 2013 on behalf of small
26 businesses that received prerecorded calls using an automatic
dialing system on cellular telephone lines without their prior
27 consent. The court certified the class, denied a motion to

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1 decertify, denied the defendants' motion for summary judgment
2 and granted partial summary judgment for the class. The case
3 settled on the eve of trial and the court granted final approval of
4 the \$975,000 settlement in 2017.

5 n. *Davenport v. Discover Financial Services*—Filed on behalf of
6 consumers who received automated solicitation telephone calls
7 on their cellular telephones without their prior express consent
8 within the meaning of the Telephone Consumer Protection Act,
9 47 U.S.C. § 227 et seq. The case settled on a class-wide basis for
10 \$5,000,000 in 2016, and final approval was granted in December
11 2017.

12 o. *Bee, Denning, Inc., et al. v. Capital Alliance Group*—Terrell
13 Marshall represents two certified classes of consumers who
14 received junk faxes and automated, prerecorded solicitation
15 telephone calls on their cellular telephones without their prior
16 express consent within the meaning of the Telephone Consumer
17 Protection Act, 47 U.S.C. § 227 et seq. The case settled on a
18 class-wide basis in 2016, and final approval was granted in
19 November 2016.

20 p. *Lushe v. Verengo, Inc.*—Filed on behalf of consumers who
21 received automated, prerecorded solicitation telephone calls on
22 their cellular and residential telephones without their prior
23 express consent, within the meaning of the Telephone Consumer
24 Protection Act, 47 U.S.C. § 227 et seq. The case settled on a
25 class-wide basis in 2015 for \$2,365,000, and final approval was
26 granted in May 2016.

27 q. *Rinky Dink v. World Business Lenders, LLC*—Filed on behalf of
consumers who received automated, prerecorded solicitation
telephone calls on their cellular telephones and Washington
landlines without their prior express consent within the meaning
of the Telephone Consumer Protection Act, 47 U.S.C. § 227 et
seq., the Washington Automatic Dialing and Announcing Device
statute, RCW 80.36.400, and the Washington Consumer
Protection Act, RCW 19.86 et seq. The case settled on a class-
wide basis in 2015 for \$1,000,000, and final approval was
granted in May 2016.

r. *Rinky Dink v. Electronic Merchant Systems, Inc.*—Filed on
behalf of consumers who received automated, prerecorded
solicitation telephone calls on their cellular telephones and
Washington landlines without their prior express consent within
the meaning of the Telephone Consumer Protection Act, 47

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1 U.S.C. § 227 et seq., the Washington Automatic Dialing and
2 Announcing Device statute, RCW 80.36.400, and the
3 Washington Consumer Protection Act, RCW 19.86 et seq. The
4 case settled on a class-wide basis in 2015 for \$1,250,000, and
5 final approval was granted in April 2016.

6 s. *Gehrich v. Chase Bank USA*—Filed on behalf of consumers who
7 received automated, prerecorded collection telephone calls on
8 their cellular telephones without their prior express consent
9 within the meaning of the Telephone Consumer Protection Act,
10 47 U.S.C. § 227 et seq. Terrell Marshall negotiated a
11 \$34,000,000 nationwide settlement; final approval was granted
12 in March 2016.

13 t. *Taylor v. Universal Auto Group I*—Filed on behalf of consumers
14 who received automated, prerecorded solicitation telephone calls
15 on their cellular telephones without their prior express consent
16 within the meaning of the Telephone Consumer Protection Act,
17 47 U.S.C. § 227 et seq. The case settled on a class-wide basis
18 and final approval was granted in February 2016.

19 u. *Ott v. Mortgage Investors Corporation*—Filed on behalf of
20 consumers who received automated solicitation telephone calls
21 on their cellular and residential telephones without their prior
22 express consent within the meaning of the Telephone Consumer
23 Protection Act, 47 U.S.C. § 227 et seq. Terrell Marshall
24 negotiated a \$7,483,600 class-wide settlement and final approval
25 was granted in January 2016.

26 v. *Chesbro v. Best Buy Stores, L.P.*—Filed on behalf of consumers
27 who received automated, prerecorded solicitation telephone calls
on their residential telephones without their prior express
consent within the meaning of the Telephone Consumer
Protection Act, 47 U.S.C. § 227 et seq. Terrell Marshall
negotiated a \$4.5 million settlement, which was granted final
approval in September 2014.

w. *Rose v. Bank of America Corp.*—Filed on behalf of consumers
who received automated, prerecorded collection telephone calls
on their cellular telephones without their prior express consent
within the meaning of the Telephone Consumer Protection Act,
47 U.S.C. § 227 et seq. Terrell Marshall negotiated a nationwide
settlement of \$32,083,905, which was granted final approval in
August 2014.

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- x. *Steinfeld v. Discover Financial Services*—Filed on behalf of consumers who received automated, prerecorded collection telephone calls on their cellular telephones without their prior express consent within the meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq. Terrell Marshall negotiated an \$8.7 million settlement, which was granted final approval in March 2014.
- y. *Hanley v. Fifth Third Bank*—Filed on behalf of consumers who received automated, prerecorded collection telephone calls on their cellular telephones without their prior express consent within the meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq. Terrell Marshall negotiated a \$4.5 million settlement, which was granted final approval in December 2013.
- z. *Joseph v. TrueBlue Inc.*—Filed on behalf of consumers who received spam text messages on their cellular telephones without their prior express consent within the meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq. The case settled on a class-wide basis in 2016 for \$5,000,000, and final approval was granted in March 2017.
- aa. *Arthur v. Sallie Mae, Inc.*—Filed on behalf of consumers who received automated, prerecorded collection telephone calls on their cellular telephones without their prior express consent within the meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq. Terrell Marshall negotiated a \$24.15 million nationwide settlement, and final approval was granted in 2012.

Qualifications of Terrell Marshall Attorneys and Staff

16. I am a founding member of Terrell Marshall. With over twenty-five years of experience, I concentrate my practice in complex litigation, including the prosecution of consumer protection, defective product, and wage and hour class actions. I have served as co-lead counsel on multi-state, multi-district, and nationwide class actions, resulting in hundreds of millions of dollars in settlements for consumers and workers. I also represent individual employees with wage and hour, workplace exposure, and discrimination claims.

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1 17. I received a B.A., magna cum laude, from Gonzaga University in 1990. In 1995, I
2 received my J.D. from the University of California, Davis School of Law, Order of the Coif.
3 Prior to forming Terrell Marshall in May 2008, I was a member of Tousley Brain Stephens
4 PLLC. I am a frequent speaker at legal conferences on a wide variety of topics including
5 consumer class actions, employment litigation, and electronic discovery, and I have been
6 awarded an “AV” rating in Martindale Hubble by my peers.

7 18. I have tried and won cases in state and federal courts and argued before the
8 Washington State Court of Appeals and the Washington State Supreme Court as well as several
9 federal circuit level courts. I served as the President of the Public Justice Foundation Board of
10 Directors from July 2019 to July 2020, serve on the Equal Justice Works’ Board of Counselors,
11 and am Chair of both the Northwest Consumer Law Center and the Washington Employment
12 Lawyers Association. I am also Co-Chair of PLI’s Consumer Financial Services Institute, and
13 frequently present on a wide variety of topics, including class actions, consumer protection, legal
14 ethics, gender equity, and electronic discovery.

15 19. I have been repeatedly named to the annual Washington Super Lawyers list. I
16 have also been named to the Top 100 Washington Super Lawyers list and the Top 50 Women
17 Super Lawyers list. I was a part of the trial team that obtained the \$16.7 million jury verdict
18 against the University of Washington Police Department in December 2024.

19 20. **Jennifer Rust Murray** is a founding member of Terrell Marshall who practices
20 complex litigation, including the prosecution of consumer and wage and hour class actions. In
21 2005, Ms. Murray received her J.D. from the University of Washington School of Law where
22 she was a member of the Washington Law Review. Ms. Murray’s law review article entitled
23 “Proving Cause in Fact under Washington’s Consumer Protection Act: The Case for a
24 Rebuttable Presumption of Reliance” won the Carkeek prize for best submission by a student
25 author. Before law school, Ms. Murray earned a Ph.D. in Philosophy from Emory University.
26 Ms. Murray has been an active member of the Washington State Bar Association since her

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1 admission to the bar in 2005. She was admitted to the Oregon State Bar in 2010. Ms. Murray
2 currently is vice-president of the board of Washington's Unemployment Law Project. She
3 regularly presents at legal conferences on consumer issues.

4 21. **Blythe H. Chandler** joined Terrell Marshall in 2014 and became a member in
5 2018. I practice complex litigation with a focus on prosecution of consumer class actions. Ms.
6 Chandler has been appointed class counsel in cases challenging a wide range of unfair or
7 deceptive practices, including debt collection practices. In 2010, she received her J.D. from the
8 University of Washington School of Law with high honors, Order of the Coif. Ms. Chandler
9 served as Chief Articles Editor for the Washington Law Review. Before joining Terrell Marshall,
10 Ms. Chandler served as a law clerk to the Honorable Betty B. Fletcher, Senior United States
11 Circuit Judge for the Ninth Circuit Court of Appeals, and to the Honorable John C. Coughenour,
12 Senior United States District Judge for the Western District of Washington. She also served as a
13 judicial extern to the Honorable Robert S. Lasnik, United States District Judge for the Western
14 District of Washington. Ms. Chandler co-authored chapters of the Consumer Protection
15 Deskbook published by the Washington State Association for Justice (WSAJ) and has spoken on
16 topics including use of experts and personal jurisdiction in class actions. Ms. Chandler is a
17 member of the Public Justice Foundation Board of Directors, a member of the Washington
18 Employment Lawyers Association (WELA) Amicus Committee, and currently co-chair of
19 WSAJ's Consumer Protection Section. Ms. Chandler was named to the 2020 Rising Star List by
20 Washington Super Lawyers.

21 22. **Elizabeth A. Adams** joined Terrell Marshall in 2015 and became a member in
22 2022. Ms. Adams concentrates her practice in complex litigation, including the prosecution of
23 consumer, wage and hour, and civil rights class actions. In 2012, Ms. Adams received her J.D.
24 from the UCLA School of Law, where she received the Order of the Coif and served as a
25 Comments Editor for the UCLA Law Review. Before joining Terrell Marshall, Ms. Adams
26 served as a law clerk to the Honorable Dean D. Pregerson, the Honorable George Wu, and the

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1 Honorable John A. Kronstadt, all of the United States District Court for the Central District of
2 California.

3 23. **Hannah Fitzmorris** was a law clerk at Terrell Marshall during the summer
4 before her third year as a law student at the University of Washington School of Law.

5 24. **Jodi Nuss** is a senior paralegal at Terrell Marshall with more than 13 years of
6 experience in the legal field.

7 25. **Heather Brown** is a paralegal at Terrell Marshall with more than 20 years of
8 experience in the legal field.

9 26. **Jessica Langsted** is a paralegal at Terrell Marshall with 6 years of legal
10 experience.

11 27. **Holly Rota** is a legal assistant at Terrell Marshall with 19 years of experience in
12 the legal field.

13 28. **Krystal Brown** is a legal assistant at Terrell Marshall with 14 years of experience
14 in the legal field.

15 29. **Deylen Sueoka** is a legal assistant at Terrell Marshall with 2 years of legal
16 experience.

17 30. **Chantal Montanez** is a legal assistant at Terrell Marshall with 3 years of
18 experience in the legal field.

19 31. **Ana Amezaga** was a legal assistant at Terrell Marshall with 2 years of experience
20 in the legal field.

21 **Attorneys' Fees and Costs**

22 32. Since the beginning of this case, Terrell Marshall has worked with no guarantee
23 of being compensated for its time and efforts. Payment of Terrell Marshall's fees has always
24 been contingent on successfully obtaining relief for the plaintiffs and class members. As a result,
25 there was a substantial risk of non-payment, particularly in light of the challenges inherent in this
26 type of case. Work on this case has necessarily been to the exclusion of work on other matters

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1 that likely would have generated fees. Terrell Marshall has also been denied use of the fees it
2 earned over the course of this case.

3 33. The work performed by paralegals and legal assistants was work that I or an
4 attorney would have had to perform absent such assistance. Senior paralegal Jodi Nuss's work
5 required an understanding of the facts and claims at issue in the case and was important to the
6 development of those facts and claims. Her work included research and extensive data analysis
7 that was instrumental to identifying the class and individual claims for each class member. All of
8 the work performed by our staff members required an understanding of relevant legal rules and
9 concepts. All of our staff members are qualified to perform substantive legal work based on their
10 training and past experience working for attorneys.

11 34. A spreadsheet that compiles the contemporaneously maintained billing records of
12 Terrell Marshall attorneys and staff is attached as Exhibit A. I have reviewed these billing
13 records and reduced and eliminated time where appropriate. I eliminated time that was
14 administrative in nature. I also reviewed for redundant or inefficient work but did not find that
15 any such time was present. It is my firm belief that the time billed was reasonably necessary to
16 litigate this case and secure a settlement on behalf of Plaintiffs and the Class.

17 35. The following table identifies the attorneys and staff members from Terrell
18 Marshall who worked on this case and for whom the recovery of fees is sought. For each of the
19 timekeepers below I have stated the current hourly rate, the number of hours worked through
20 October 16, 2023, and the total amount of fees. These time summaries are taken from
21 contemporaneous, daily time reports prepared and maintained by Terrell Marshall in the regular
22 course of business.

Professional	Role	Rate	Hours	Lodestar
Beth E. Terrell	Partner	\$775	1.7	\$1,317.50
Jennifer Rust Murray	Partner	\$725	297	\$215,325.00

27 DECLARATION OF BETH E. TERRELL IN
SUPPORT OF PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS AND EXPENSES,
AND SERVICE AWARDS - 13

Case No. 2:21-cv-01571-BJR

TERRELL MARSHALL LAW GROUP PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
TEL. 206.816.6603 • FAX 206.319.5450
www.terrellmarshall.com

Professional	Role	Rate	Hours	Lodestar
Blythe H. Chandler	Partner	\$600	2.8	\$1,680.00
Elizabeth A. Adams	Partner	\$500	12.7	\$6,350.00
Hannah Fitzmorris	Law Clerk	\$250	82.9	\$20,725.00
Jodi Nuss	Senior Paralegal	\$295	166.7	\$49,176.50
Heather Brown	Paralegal	\$225	4.9	\$1,102.50
Jessica A. Langsted	Paralegal	\$225	17.6	\$3,960.00
Holly Rota	Legal Assistant	\$225	2.3	\$517.50
Krystal Brown	Legal Assistant	\$225	19	\$4,275.00
Deylen Sueoka	Legal Assistant	\$125	9.8	\$1,225.00
Chantal Montanez	Legal Assistant	\$125	8.9	\$1,112.50
Ana Amezaga	Legal Assistant	\$125	13.5	\$1,687.50
TOTALS			639.8	\$308,454.00

36. The time described above does not include time that our firm will spend drafting the final approval motion, preparing for the final approval hearing, responding to any Settlement Class Member objections or inquiries, and supervising the settlement administrator's distribution of the Settlement Fund. Terrell Marshall estimates it will incur additional fees to prosecute this case through final settlement approval.

Terrell Marshall's Rates Have Been Approved by Courts Around the Country

37. Terrell Marshall sets their rates for attorneys and staff members based on a variety of factors, including among others: the experience, skill and sophistication required for the types of legal services typically performed; the rates customarily charged in the markets where legal

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1 services are typically performed; and the experience, reputation and ability of the attorneys and
2 staff members.

3 38. Courts around the country have approved fee requests based on Terrell Marshall's
4 standard rates at the time of the application. Here is a sample of the courts that have approved
5 Terrell Marshall's rates as reasonable in class action litigation:

- 6 a. September 2019, in *Borecki v. Raymours Furniture*, No. 1:17-cv-01188-
7 LAK-SN (S.D.N.Y.);
- 8 b. August 2019, in *Abante Rooter and Plumbing v. Alarm.com*, No. 4:15-cv-
9 06314-YGR (N.D. Cal.);
- 10 c. September 2017, in *Melito v. American Eagle Outfitters, Inc.*, No. 14-CV-
11 2440 (VEC) (S.D.N.Y.);
- 12 d. May 2016, in *Lushe v. Verengo, Inc.*, No. CV 13-07632-AB (PJWx) (C.D.
13 Cal.);
- 14 e. September 2014, in *Chesbro v. Best Buy Stores, L.P.*, No. C10-774 RAJ
15 (W.D. Wash.);
- 16 f. March 2013, in *Meilleur v. AT&T Corp.*, No. C11-01025 MJP (W.D.
17 Wash.);
- 18 g. October 2012, in *Khadera v. ABM Industries, Inc.*, No. C08-0417 RSM
19 (W.D. Wash.);
- 20 h. September 2012, in *Arthur v. Sallie Mae, Inc.*, No. C10-00198 JLR (W.D.
21 Wash.);
- 22 i. January 2012, in *Milligan v. Toyota Motor Sales, U.S.A., Inc.*, No. C09-
23 05418 RS (N.D. Cal.); and
- 24 j. August 2011, in *Seraphin v. AT&T Internet Services*, CV-00131-REB (D.
25 Idaho).

26 **Summary of Class Counsel's Lodestar Across All Law Firms**

27 39. Collectively, Class Counsel devoted 1,771.8 hours to this case for a total lodestar
of \$1,136,709.00. Class Counsel worked collaboratively, but also took care to avoid duplication
of effort by dividing tasks according to each professional's skill, experience, and availability,

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1 both within and amongst the firms. Class Counsel kept contemporaneous, detailed time records
 2 in chronological order by timekeeper in the regular course of business. The resulting hours are
 3 those that would be billed to a fee-paying client in a non-contingent case. Class Counsel's hours,
 4 by firm, are summarized in this chart:

Firm	Total Hours	Total Lodestar
Terrell Marshall Law Group	639.8	\$308,454.00
Berger Montague	1,132	\$828,255.00
TOTAL	1,771.8	\$1,136,709.00

Litigation Costs

11 40. Terrell Marshall incurred out-of-pocket litigation expenses totaling over \$32,067,
 12 primarily to cover expenses related to legal research, investigation, filing fees, and administrative
 13 costs such as copying, mailing, and messenger expenses. Terrell Marshall incurred substantial
 14 professional fees necessary for the legal representation of the individuals that sent Plaintiffs the
 15 text messages at issue in this case. These costs were expended to benefit Plaintiffs and the Class,
 16 as Robinhood sought documents and testimony from Plaintiffs' friends and family members. The
 17 following chart summarizes Terrell Marshall's litigation costs:

Category of Expense	Total
Courier, Process Service, Postage and Delivery Services	\$335.00
Court Reporters and Transcripts	\$3,082.62
Expert Witnesses	\$15,157.78
Filing Fees	\$714.00
Travel (Air fare, Hotel, Meals, Rides, and Parking)	\$1,578.12
PACER	\$101.30
Professional Fees	\$10,660.00

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Category of Expense	Total
Public Records Requests	\$328.00
Outside Photocopies	\$77.50
Westlaw Charges	\$30.41
Electronic Production/Data Hosting	\$3.06
TOTAL	\$32,067.79

41. Collectively, Class Counsel incurred \$142,407.76 in out-of-pocket costs.

Service Awards

42. We are requesting service awards of \$10,000 for each of the Class Representatives. Both worked closely with Class Counsel to respond to discovery, sat for a deposition, and were ready and willing to testify at trial. And both rejected an individual settlement offer so that they could pursue claims on behalf of the Class. I believe \$10,000 service awards for their efforts are reasonable and appropriate.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

EXECUTED at Seattle, Washington and DATED this 12th day of April, 2024.

By: /s/ Beth E. Terrell
Beth E. Terrell, WSBA #26759

DECLARATION OF BETH E. TERRELL IN
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Exhibit A

Terrell Marshall Law Group PLLC

Moore v. Robinhood Financial LLC

Matter 2474-001

Date	Initials	Narrative	Units	Rate	Value
11/17/21	AA	Followed up with the CA clerk regarding transferring case to WA[0.5].	0.5	\$ 125.00	\$ 62.50
01/14/22	AA	Worked on amended complaint[1].	1.0	\$ 125.00	\$ 125.00
01/26/22	AA	Worked on stipulated motion to file amended complaint[3].	3.0	\$ 125.00	\$ 375.00
02/01/22	AA	Worked on and filed stipulated motion with exhibits[3].	3.0	\$ 125.00	\$ 375.00
03/15/22	AA	Finalized opposition to motion to dismiss and filed with the court[4].	4.0	\$ 125.00	\$ 500.00
04/05/22	AA	Worked on joint status report; updated caption and contacts[2].	2.0	\$ 125.00	\$ 250.00
		Statement Professional: Ana Amezaga	13.5		\$ 1,687.50
08/31/23	BET	Team call regarding [REDACTED] and plan to address same[0.7].	0.7	\$775	\$ 542.50
09/05/23	BET	Team call regarding discovery and mediation[0.5].	0.5	\$775	\$ 387.50
09/06/23	BET	Team call regarding [REDACTED] [0.5].	0.5	\$775	\$ 387.50
		Statement Professional: Beth Terrell	1.7		\$ 1,317.50
12/11/23	BHC	Worked on settlement agreement and notices supporting same[1.8].	1.8	\$ 600.00	\$ 1,080.00
12/12/23	BHC	Final review of settlement documents from co-counsel before having them sent to defendant[0.3].	0.3	\$ 600.00	\$ 180.00
12/13/23	BHC	Worked on request for proposal to settlement administrators[0.4].	0.4	\$ 600.00	\$ 240.00
12/27/23	BHC	Discussed case management with Ms. Murray[0.1].	0.1	\$ 600.00	\$ 60.00
02/21/24	BHC	Discussed case management with Ms. Murray[0.2].	0.2	\$ 600.00	\$ 120.00
		Statement Professional: Blythe Chandler	2.8		\$ 1,680.00
07/10/23	CM	Analyzed issues regarding public records requests[0.2]; prepared public records requests[0.5]; continued to work on public records requests[0.2]; email correspondence regarding same[0.1].	1.0	\$ 125.00	\$ 125.00
07/13/23	CM	Analyzed issues regarding status of public records requests[0.4]; email correspondence with the Department of Labor and Industries regarding public records requests[0.3].	0.7	\$ 125.00	\$ 87.50
07/17/23	CM	Reviewed emails regarding public records request[0.1]; followed up regarding same[0.1].	0.2	\$ 125.00	\$ 25.00
07/20/23	CM	Reviewed response to public records request[0.2]; analyzed issues regarding same[0.2].	0.4	\$ 125.00	\$ 50.00

Terrell Marshall Law Group PLLC
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Date	Initials	Narrative	Units	Rate	Value
07/27/23	CM	Reviewed response to public records request[0.2]; analyzed issues and responded to same[0.4].	0.6	\$ 125.00	\$ 75.00
07/31/23	CM	Analyzed issues regarding subpoenas[.3]; researched entities to be subpoenaed[.5]; worked on subpoenas[1.4].	2.2	\$ 125.00	\$ 275.00
08/01/23	CM	Continued to work on subpoena packages[2.3].	2.3	\$ 125.00	\$ 287.50
10/09/23	CM	Reviewed and responded to emails regarding public records requests[0.2]; reviewed productions[0.2].	0.4	\$ 125.00	\$ 50.00
10/16/23	CM	Reviewed public records request responses and processed responses[0.4].	0.4	\$ 125.00	\$ 50.00
11/15/23	CM	Reviewed public records request responses and processed responses[0.7].	0.7	\$ 125.00	\$ 87.50
		Statement Professional: Chantal Montanez	8.9		\$ 1,112.50
10/19/23	DS	Transported Mr. Gillette from Marblemount to Seattle for deposition Miles Driven: 206.3[5.25].	5.3	\$ 125.00	\$ 662.50
10/20/23	DS	Transported client from deposition in Seattle to home in Marblemount Miles Driven: 202[4.5].	4.5	\$ 125.00	\$ 562.50
		Statement Professional: Deylen Sueoka	9.8		\$ 1,225.00
03/13/23	EAA	Worked on research in preparation for drafting portion of motion to quash Season 4 subpoena[0.7].	0.7	\$ 500.00	\$ 350.00
03/14/23	EAA	Worked on research regarding Season 4 subpoena[2.9].	2.9	\$ 500.00	\$ 1,450.00
03/15/23	EAA	Reviewed rough draft of motion to quash Season 4 subpoena[0.4]; worked on research regarding [REDACTED] issues[3.7].	4.1	\$ 500.00	\$ 2,050.00
03/16/23	EAA	Worked on research and drafting of Season 4 motion to quash[4.5]; personal conference regarding same[0.5].	5.0	\$ 500.00	\$ 2,500.00
		Statement Professional: Elizabeth Adams	12.7		\$ 6,350.00
09/29/21	HB	Reviewed S-1 for facts cited in opposition to motion to dismiss[2.7].	2.7	\$ 225.00	\$ 607.50
09/30/21	HB	Worked on declaration and exhibits in support of opposition to motion to dismiss[1.3].	1.3	\$ 225.00	\$ 292.50
03/20/23	HB	Processed production into lpro[0.3].	0.3	\$ 225.00	\$ 67.50
10/03/23	HB	Processed defendant's document production into lpro[0.5].	0.5	\$ 225.00	\$ 112.50

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Date	Initials	Narrative	Units	Rate	Value
11/06/23	HB	Worked on docketing deadlines[0.2].	0.1	\$ 225.00	\$ 22.50
		Statement Professional: Heather Brown	4.9		\$ 1,102.50
06/15/22	HF	Researched [REDACTED] issue[0.5].	0.5	\$ 250.00	\$ 125.00
		Commenced research re [REDACTED] issue[3.2]; commenced drafting memorandum regarding same[2.4].			
06/16/22	HF	Continued research re [REDACTED] issue[4.6]; continued drafting memorandum regarding same[0.6].	5.6	\$ 250.00	\$ 1,400.00
06/17/22	HF	Continued research re [REDACTED] issue[7.0].	5.2	\$ 250.00	\$ 1,300.00
06/21/22	HF	Continued research re [REDACTED] issues[8.0].	7.0	\$ 250.00	\$ 1,750.00
06/22/22	HF	Continued research re [REDACTED] issue[4.8]; personal conference regarding same[0.5].	8.0	\$ 250.00	\$ 2,000.00
06/23/22	HF	Continued research re [REDACTED] issue[2.3]; continued drafting memorandum regarding same[2.2].	5.3	\$ 250.00	\$ 1,325.00
06/24/22	HF	Continued drafting memorandum regarding [REDACTED] issue[3.3].	4.5	\$ 250.00	\$ 1,125.00
06/27/22	HF	Continued research re [REDACTED] issue[1.2]; continued drafting memorandum regarding same[2.1].	3.3	\$ 250.00	\$ 825.00
06/28/22	HF	Continued research re [REDACTED] issue[1.4]; continued drafting memorandum regarding same[2.6].	3.3	\$ 250.00	\$ 825.00
06/29/22	HF		4.0	\$ 250.00	\$ 1,000.00

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Date	Initials	Narrative	Units	Rate	Value
06/30/22	HF	Continued drafting memorandum regarding [REDACTED] issue[2.3].	2.3	\$ 250.00	\$ 575.00
07/05/22	HF	Continued research re [REDACTED] issue[0.7]; continued drafting memorandum regarding same[3.8].	4.5	\$ 250.00	\$ 1,125.00
07/07/22	HF	Continued research re [REDACTED] issue[0.8]; continued drafting memorandum regarding same[2.3].	3.1	\$ 250.00	\$ 775.00
07/08/22	HF	Continued research re [REDACTED] issue[2.3]; continued drafting memorandum regarding same[3.5].	5.8	\$ 250.00	\$ 1,450.00
07/11/22	HF	Continued research re [REDACTED] issue[0.4]; continued drafting memorandum regarding same[4.2].	4.6	\$ 250.00	\$ 1,150.00
07/12/22	HF	Continued drafting memorandum regarding [REDACTED] issue[3.4].	3.4	\$ 250.00	\$ 850.00
07/14/22	HF	Continued research re [REDACTED] and [REDACTED] issues[4.1].	4.1	\$ 250.00	\$ 1,025.00
07/20/22	HF	Continued drafting memorandum regarding [REDACTED] issue[1.4].	1.4	\$ 250.00	\$ 350.00
07/28/22	HF	Continued research re [REDACTED] issue[1.2].	1.2	\$ 250.00	\$ 300.00
07/29/22	HF	Continued drafting memorandum regarding [REDACTED] issue[1.4].	1.4	\$ 250.00	\$ 350.00
08/03/22	HF	Continued drafting memorandum regarding [REDACTED] issue[1.2]. Finalized memorandum[3.2].	1.2	\$ 250.00	\$ 300.00
08/04/22	HF		3.2	\$ 250.00	\$ 800.00
		Statement Professional: Hannah Fitzmorris	82.9		\$ 20,725.00

Terrell Marshall Law Group PLLC

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Date	Initials	Narrative	Units	Rate	Value
08/04/23	HMR	Researched various cases for client Andrew Gillette in the counties of Island, King, Skagit, Lake Forrest, Lynnwood; coordinated with the clerk of each county regarding same; emailed results to Jodi Nuss[1].	1.0	\$ 225.00	\$ 225.00
08/07/23	HMR	Worked on Skagit County District Court records request form for Andrew Gillette.; emailed same to Clerk's office[0.5].	0.5	\$ 225.00	\$ 112.50
01/05/24	HMR	Worked on and finalized joint status update; electronically filed same[0.4].	0.4	\$ 225.00	\$ 90.00
01/22/24	HMR	Worked on and finalized joint status report; electronically filed same[0.4].	0.4	\$ 225.00	\$ 90.00
		Statement Professional: Holly Rota	2.3		\$ 517.50
08/15/22	JAL	Worked on loading production[1.2].	1.2	\$ 225.00	\$ 270.00
08/16/22	JAL	Worked on loading production[1.8].	1.8	\$ 225.00	\$ 405.00
02/28/23	JAL	Worked on loading production and updating production log[1.1].	1.1	\$ 225.00	\$ 247.50
05/31/23	JAL	Worked on loading production[0.5].	0.5	\$ 225.00	\$ 112.50
06/21/23	JAL	Worked on loading production[0.6].	0.6	\$ 225.00	\$ 135.00
07/14/23	JAL	Worked on production load[0.2].	0.2	\$ 225.00	\$ 45.00
07/17/23	JAL	Worked on loading production and updating production log[1.2].	1.2	\$ 225.00	\$ 270.00
08/01/23	JAL	Worked on loading production and updating production log[0.4].	0.4	\$ 225.00	\$ 90.00
08/10/23	JAL	Worked on loading production and updating production log[0.9].	0.9	\$ 225.00	\$ 202.50
08/14/23	JAL	Worked on loading production[0.1].	0.1	\$ 225.00	\$ 22.50
08/15/23	JAL	Worked on loading production[0.2].	0.2	\$ 225.00	\$ 45.00
08/29/23	JAL	Worked on loading production[2.1].	2.1	\$ 225.00	\$ 472.50
09/06/23	JAL	Worked on loading production and updating production log[0.9].	0.9	\$ 225.00	\$ 202.50
09/21/23	JAL	Worked on loading production[0.5].	0.5	\$ 225.00	\$ 112.50
09/22/23	JAL	Worked on loading production[0.9].	0.9	\$ 225.00	\$ 202.50
10/19/23	JAL	Worked on loading production[1.5].	1.5	\$ 225.00	\$ 337.50
11/13/23	JAL	Worked on loading production[1.4].	1.4	\$ 225.00	\$ 315.00
11/22/23	JAL	Worked on loading production and updating log[2.1].	2.1	\$ 225.00	\$ 472.50
		Statement Professional: Jessica Langsted	17.6		\$ 3,960.00
08/09/21	JN	Reviewed email from Ms. Rios regarding filing of complaint and findings concerning [REDACTED] and prepared response to same[0.1].	0.1	\$ 295.00	\$ 29.50

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Date	Initials	Narrative	Units	Rate	Value
07/29/22	JN	Worked on processing of production and preparation of production log[0.2].	0.2	\$ 295.00	\$ 59.00
08/03/22	JN	Reviewed email regarding document review platform and proposed contract regarding same[0.2].	0.2	\$ 295.00	\$ 59.00
08/29/22	JN	Reviewed emails regarding concerns about data production and narrowing of fields to request and documents regarding same[0.5].	0.5	\$ 295.00	\$ 147.50
10/03/22	JN	Worked on processing of production documents[0.3].	0.3	\$ 295.00	\$ 88.50
10/10/22	JN	Worked on issues regarding requests for data and relationship between databases[0.7].	0.7	\$ 295.00	\$ 206.50
10/10/22	JN	Worked on Inka documentation and subpoena[1.1].	1.1	\$ 295.00	\$ 324.50
10/13/22	JN	Worked on document review/revisions to letter[0.9]	0.9	\$ 295.00	\$ 265.50
10/13/22	JN	Investigated functionality of refer-a-friend component of Robinhood app[2.6]	2.6	\$ 295.00	\$ 767.00
11/02/22	JN	Worked on issues regarding production[0.1].	0.1	\$ 295.00	\$ 29.50
01/03/23	JN	Worked on arrangements for shipping label to be delivered to Mr. Gillette[0.1].	0.1	\$ 295.00	\$ 29.50
01/30/23	JN	Worked on processing of production[0.4]; Worked on issues regarding processing of client data[0.1].	0.5	\$ 295.00	\$ 147.50
01/31/23	JN	Worked on issues regarding subscriber subpoenas[0.4].	0.4	\$ 295.00	\$ 118.00
02/02/23	JN	Video conference with Ms. Verkhovskaya regarding carrier subpoenas[0.5].	0.5	\$ 295.00	\$ 147.50
02/03/23	JN	Worked on research re carrier subpoenas[2.3].	2.3	\$ 295.00	\$ 678.50
02/06/23	JN	Worked on subpoenas[3.4].	3.4	\$ 295.00	\$ 1,003.00
02/10/23	JN	Worked on processing and review of defendant's production[1.3].	1.3	\$ 295.00	\$ 383.50
02/15/23	JN	Worked on issues regarding processing of client data[0.1].	0.1	\$ 295.00	\$ 29.50
02/28/23	JN	Worked on processing of production[0.2].	0.2	\$ 295.00	\$ 59.00
03/20/23	JN	Meeting with Mr. Cooper regarding cell phone backup[0.2].	0.2	\$ 295.00	\$ 59.00
03/20/23	JN	Worked on processing of production[0.2].	0.2	\$ 295.00	\$ 59.00
03/22/23	JN	Worked on issues regarding data sampling and court's position on data productions[0.2].	0.2	\$ 295.00	\$ 59.00
03/23/23	JN	Worked on review of client data[0.4].	0.4	\$ 295.00	\$ 118.00
03/23/23	JN	Conducted searches of client device images and prepared documentation of same[1.8].	1.8	\$ 295.00	\$ 531.00
03/24/23	JN	Worked on search terms[2.2].	2.2	\$ 295.00	\$ 649.00
03/27/23	JN	Worked on search terms[1.1].	1.1	\$ 295.00	\$ 324.50

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Date	Initials	Narrative	Units	Rate	Value
03/27/23	JN	Continued working on search terms and image extraction	3.1	\$ 295.00	\$ 914.50
03/28/23	JN	Worked on subpoena to Verizon[1.1].	1.1	\$ 295.00	\$ 324.50
03/30/23	JN	Worked on preparation of subpoena package and email to Mr. Gillette enclosing same[0.4]	0.4	\$ 295.00	\$ 118.00
03/30/23	JN	Worked on extraction of reports	1.7	\$ 295.00	\$ 501.50
03/31/23	JN	Worked on plaintiffs' production of information from devices[1.5].	1.5	\$ 295.00	\$ 442.50
04/03/23	JN	Reviewed DocuSign package status and prepared email regarding same[0.1].	0.1	\$ 295.00	\$ 29.50
04/07/23	JN	Worked on processing of production documents[0.3]	0.3	\$ 295.00	\$ 88.50
05/05/23	JN	Reviewed email from Ms. Mitterndorfer and retrieved document production for processing[0.1].	0.1	\$ 295.00	\$ 29.50
05/09/23	JN	Worked on extracting reports from phone images	1.1	\$ 295.00	\$ 324.50
05/19/23	JN	Reviewed hit counts[0.1].	0.1	\$ 295.00	\$ 29.50
05/19/23	JN	Worked on revisions to search terms and reviewed documents to test same[1.3].	1.3	\$ 295.00	\$ 383.50
06/02/23	JN	Processed document productions[0.4].	0.4	\$ 295.00	\$ 118.00
06/05/23	JN	Worked on dep prep[0.2]; Deposition of Mr. Behuinin[2.4].	2.6	\$ 295.00	\$ 767.00
06/12/23	JN	Video conference with Mr. Woolfson regarding potential scope of work and data available for analysis[0.8].	0.8	\$ 295.00	\$ 236.00
06/20/23	JN	Worked on updates to production log and processing of documents[0.3].	0.3	\$ 295.00	\$ 88.50
06/21/23	JN	Reviewed correspondence regarding Defendant's discovery responses and prepared response to same[0.1].	0.1	\$ 295.00	\$ 29.50
06/28/23	JN	Analyzed data from plaintiffs' devices for production[2.4].	2.4	\$ 295.00	\$ 708.00
06/29/23	JN	Processed document productions[0.3].	0.3	\$ 295.00	\$ 88.50
07/11/23	JN	Worked on processing of production[0.2]; Worked on search and review of text messages from Mr. Moore's device and prepared email regarding same[0.1].	0.3	\$ 295.00	\$ 88.50
07/31/23	JN	Reviewed data produced by Robinhood[.8]; analyzed issues regarding expert work regarding carrier subpoenas[0.3]; attended team call regarding same[1].	2.1	\$ 295.00	\$ 619.50
07/31/23	JN	Worked on data analysis; preparation of subpoenas and research on entities[3.1].	3.1	\$ 295.00	\$ 914.50
08/01/23	JN	Worked on subpoenas[1.3].	1.3	\$ 295.00	\$ 383.50

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08/03/23	JN	Worked on data analysis in advance of call with Mr. Woolfson[0.4]; Video conference with Mr. Woolfson regarding processes for analysis and data points required for same[1].	1.4	\$ 295.00	\$ 413.00
08/03/23	JN	Worked on research of Branch and potential utility of subpoena to same[0.3].	0.3	\$ 295.00	\$ 88.50
08/04/23	JN	Reviewed Peopemap report and case filings and prepared emails regarding same[0.6].	0.6	\$ 295.00	\$ 177.00
08/08/23	JN	Prepared email enclosing filings delivered by Skagit County[0.1].	0.1	\$ 295.00	\$ 29.50
08/09/23	JN	Reviewed email from Ms. Rainwater regarding clawback of document and prepared emails regarding same[0.1]; Worked on removal of clawback document[0.3];Reviewed email from Ms. Mitterndorfer enclosing link to production documents and retrieved same for processing[0.1].	0.5	\$ 295.00	\$ 147.50
08/10/23	JN	Prepared emails to Mr. Woolfson regarding subpoena responses and reviewed responses to same[0.2].	0.2	\$ 295.00	\$ 59.00
08/11/23	JN	Video conference with Mr. Woolfson regarding report[0.4].	0.4	\$ 295.00	\$ 118.00
08/15/23	JN	Reviewed response from T-Mobile and prepared response regarding same[0.5].	0.5	\$ 295.00	\$ 147.50
08/29/23	JN	Telephone conference with Verizon LSR associate regarding shipping address and delivery of responses to subpoena[0.1].	0.1	\$ 295.00	\$ 29.50
09/08/23	JN	Worked on [REDACTED] [1.6].	1.6	\$ 295.00	\$ 472.00
09/13/23	JN	Discussions regarding response to class member inquiries[0.5].	0.5	\$ 295.00	\$ 147.50
09/15/23	JN	Worked on [REDACTED] data analysis[5]; telephone conference with Mr. Woolfson[4.5].	5.0	\$ 295.00	\$ 1,475.00
09/18/23	JN	Worked on [REDACTED] [0.5].	0.5	\$ 295.00	\$ 147.50
09/18/23	JN	Worked on [REDACTED] [5.7].	5.7	\$ 295.00	\$ 1,681.50
09/19/23	JN	Worked on [REDACTED] and data analysis[7].	7.0	\$ 295.00	\$ 2,065.00
09/20/23	JN	Worked on data analysis and [REDACTED] [1.6].	1.6	\$ 295.00	\$ 472.00
09/21/23	JN	Reviewed documents and draft report in advance of call with Mr. Woolfson[0.3]Video conference with Mr. Woolfson regarding expert report and deposition prep[1.6]; worked on additional data analysis following meeting with Mr. Woolfson[1.1].	3.0	\$ 295.00	\$ 885.00

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09/25/23	JN	Telephone conference with Ms. Nicola regarding AT&T subpoena deficiency and prepared follow-up emails regarding same[0.2].	0.2	\$ 295.00	\$ 59.00
09/26/23	JN	Worked on deposition preparation and data analysis for same[5.6].	5.6	\$ 295.00	\$ 1,652.00
09/27/23	JN	Attended deposition[6.3].	6.3	\$ 295.00	\$ 1,858.50
09/29/23	JN	Worked on data analysis and revision to expert report[1.2]; worked on iPro database and purging of clawed back documents[0.3]; Telephone conference with Verizon subpoena compliance regarding legibility of responses[0.2].	1.7	\$ 295.00	\$ 501.50
10/02/23	JN	Gathered documents responsive to subpoenas and prepared email regarding processing of same[2.8].	2.8	\$ 295.00	\$ 826.00
10/03/23	JN	Reviewed emails regarding revisions to expert report and prepared response outlining analysis of same[0.3]; Reviewed emails regarding production of subpoena responses and prepared response to same[0.1]; Worked on processing of productions[0.2].	0.6	\$ 295.00	\$ 177.00
10/06/23	JN	Worked with Robinhood data to identify discrepancies in numbers reported re deanonymized sample[0.8].	0.8	\$ 295.00	\$ 236.00
10/10/23	JN	Worked on expert report[5].	5.0	\$ 295.00	\$ 1,475.00
10/13/23	JN	Worked on █████ data[8]; worked on processing/review of subpoena responses[0.6].	8.6	\$ 295.00	\$ 2,537.00
10/16/23	JN	Meeting with Mr. Woolfson re report and data[8].	8.0	\$ 295.00	\$ 2,360.00
10/19/23	JN	Worked on processing of production documents[0.1].	0.1	\$ 295.00	\$ 29.50
10/20/23	JN	Reviewed emails regarding status of expert report and prepared responses to same[0.1]; worked on █████ analysis[6.7].	6.8	\$ 295.00	\$ 2,006.00
10/23/23	JN	Worked on review of expert report and prepared summary regarding status of carrier outreach and results of same[0.6].	0.6	\$ 295.00	\$ 177.00
10/23/23	JN	Worked on █████ analysis[9.8].	9.8	\$ 295.00	\$ 2,891.00
10/24/23	JN	Worked on revisions to declaration[13.6].	13.6	\$ 295.00	\$ 4,012.00
10/25/23	JN	Worked on expert issues[4.7].	4.7	\$ 295.00	\$ 1,386.50
10/25/23	JN	Continued working on revisions to declaration[0.5].	0.5	\$ 295.00	\$ 147.50
10/26/23	JN	Call with Ms. Rios regarding data/report revisions[0.8].	0.8	\$ 295.00	\$ 236.00
10/26/23	JN	Worked on data/declaration[4].	4.0	\$ 295.00	\$ 1,180.00
10/27/23	JN	Worked on strategy for further analysis and meeting with expert[0.3].	0.3	\$ 295.00	\$ 88.50

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10/27/23	JN	Worked on data sampling, analysis, [REDACTED] [3.8].	3.8	\$ 295.00	\$ 1,121.00
11/06/23	JN	Worked on revisions to subpoena to Consumer Cellular[0.1].	0.1	\$ 295.00	\$ 29.50
11/06/23	JN	Prepared emails to clients regarding execution of errata pages to depositions[0.2].	0.2	\$ 295.00	\$ 59.00
11/09/23	JN	Worked on compiling documents for response to subpoena to Mr. Woolfson[0.5]. Call with Mr. Woolfson regarding response to subpoena and compilation of documents	0.5	\$ 295.00	\$ 147.50
11/10/23	JN	for use in same[0.7].	0.7	\$ 295.00	\$ 206.50
11/13/23	JN	Worked on processing of production and errata sheets[0.3].	0.3	\$ 295.00	\$ 88.50
11/13/23	JN	Call regarding expert report and production in response to subpoena[1.9]. Telephone conferences with Mr. Woolfson regarding expert work[0.5]; reviewed and analyzed draft expert analysis[1.2]; email correspondence regarding draft expert	1.9	\$ 295.00	\$ 560.50
11/14/23	JN	analysis[0.2].	1.9	\$ 295.00	\$ 560.50
11/15/23	JN	Call with Mr. Woolfson regarding production of code[0.7]. Worked on review of files uploaded by Mr. Woolfson and prepared email enclosing	0.7	\$ 295.00	\$ 206.50
11/16/23	JN	analysis and unprocessed file[0.6].	0.6	\$ 295.00	\$ 177.00
12/05/23	JN	Worked on final processing of Consumer Cellular prodction[0.1].	0.1	\$ 295.00	\$ 29.50
Statement Professional: Jodi Nuss			166.7		\$ 49,176.50
07/23/21	JRM	Telephone conference regarding new matter[1.0].	1.0	\$ 725.00	\$ 725.00
07/29/21	JRM	Researched potential [REDACTED] claims[0.3]; worked on Complaint[3.0].	3.3	\$ 725.00	\$ 2,392.50
07/30/21	JRM	Worked on Complaint[0.5]; continued to work on Complaint[5.6].	6.1	\$ 725.00	\$ 4,422.50
08/03/21	JRM	Telephone conference regarding potential new case[1.5].	1.5	\$ 725.00	\$ 1,087.50
08/06/21	JRM	Reviewed and revised complaint[0.9]; continued to edit same[0.4].	1.3	\$ 725.00	\$ 942.50
08/09/21	JRM	Reviewed Complaint and initiating documents[0.3].	0.3	\$ 725.00	\$ 217.50
08/16/21	JRM	Email correspondence regarding notice of appearance and initiating documents[0.1].	0.1	\$ 725.00	\$ 72.50
08/23/21	JRM	Analyzed issues regarding venue[1.0].	1.0	\$ 725.00	\$ 725.00
09/16/21	JRM	Reviewed motion to dismiss[0.1]; reviewed motion to transfer[0.1].	0.2	\$ 725.00	\$ 145.00
09/17/21	JRM	Analyzed issues relating to motion to transfer venue[0.2].	0.2	\$ 725.00	\$ 145.00

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09/20/21	JRM	Reviewed motion to dismiss and analyzed issues regarding same[0.5]; telephone conference with co-counsel regarding motions to dismiss and transfer[0.7]; followed up with same[0.5].	1.7	\$ 725.00	\$ 1,232.50
09/23/21	JRM	Worked on response to motion to dismiss[1.0].	1.0	\$ 725.00	\$ 725.00
09/25/21	JRM	Worked on opposition to motion to dismiss[6.5].	6.5	\$ 725.00	\$ 4,712.50
09/26/21	JRM	Worked on opposition to motion to dismiss[7.8].	7.8	\$ 725.00	\$ 5,655.00
09/27/21	JRM	Worked on opposition to motion to dismiss[0.5]; continued to work on same[1.5]; continued to work on same[4.8].	6.8	\$ 725.00	\$ 4,930.00
09/28/21	JRM	Revised opposition to motion to dismiss[1.0].	1.0	\$ 725.00	\$ 725.00
09/29/21	JRM	Reviewed opposition to motion to transfer venue[0.2].	0.2	\$ 725.00	\$ 145.00
09/30/21	JRM	Revised response to motion to dismiss[3.0]; worked on supporting documents for response to motion to dismiss and request for judicial notice[1.0].	4.0	\$ 725.00	\$ 2,900.00
10/19/21	JRM	Analyzed issues regarding case schedule[0.9].	0.9	\$ 725.00	\$ 652.50
10/20/21	JRM	Drafted proposed schedule and email to co-counsel regarding same[0.6]; reviewed reply brief and analyzed issues for oral argument[1.5]; continued to work on same[1.0]; telephone conference with team regarding oral argument[1.0]; followed up with same[0.4].	4.5	\$ 725.00	\$ 3,262.50
12/16/21	JRM	Email correspondence regarding 26(f) conference[0.1]; telephone call from Mr. Payson regarding same[0.2]; followed up with same[0.1].	0.4	\$ 725.00	\$ 290.00
12/17/21	JRM	Analyzed issues relating to motion to stay[0.7].	0.7	\$ 725.00	\$ 507.50
01/03/22	JRM	Telephone conference with opposing counsel regarding case schedule[0.3]; followed up with same[0.2]; telephone conference with court regarding schedule[0.2]; followed up with same[1.3]; reviewed revised schedule and email correspondence regarding same[0.2].	2.2	\$ 725.00	\$ 1,595.00
01/04/22	JRM	Revised stipulated motion[0.7].	0.7	\$ 725.00	\$ 507.50
01/06/22	JRM	Reviewed memo and email correspondence regarding same[0.3].	0.3	\$ 725.00	\$ 217.50
01/11/22	JRM	Telephone conference regarding amended complaint[1.0].	1.0	\$ 725.00	\$ 725.00
01/12/22	JRM	Researched issues for amended complaint[1.0]; reviewed amended complaint and analyzed issues regarding same[0.5].	1.5	\$ 725.00	\$ 1,087.50
01/13/22	JRM	Telephone conference with co-counsel regarding amended complaint[1.0].	1.0	\$ 725.00	\$ 725.00

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01/14/22	JRM	Reviewed draft amended complaint and followed up with same[0.2].	0.2	\$ 725.00	\$ 145.00
01/26/22	JRM	Worked on stipulation to file amended complaint[0.5]; continued to work on same[0.2].	0.7	\$ 725.00	\$ 507.50
02/01/22	JRM	Worked on stipulated motion to amend complaint[0.2]; continued to work on same[0.7].	0.9	\$ 725.00	\$ 652.50
02/15/22	JRM	Email correspondence regarding meet and confer[0.1].	0.1	\$ 725.00	\$ 72.50
02/17/22	JRM	Telephone conference with Mr. Payson and Mr. Franz regarding motion to dismiss[0.1]; followed up with same[0.2].	0.3	\$ 725.00	\$ 217.50
03/10/22	JRM	Reviewed and revised opposition to motion to dismiss[2.2].	2.2	\$ 725.00	\$ 1,595.00
03/11/22	JRM	Reviewed edits to opposition to motion to dismiss[0.2]; followed up with same[0.1].	0.3	\$ 725.00	\$ 217.50
03/12/22	JRM	Worked on opposition to motion to dismiss[4.0].	4.0	\$ 725.00	\$ 2,900.00
03/14/22	JRM	Reviewed and revised opposition to motion to dismiss[0.5]; telephone conference with team regarding same[0.5]; continued to work on same[1.0].	2.0	\$ 725.00	\$ 1,450.00
03/15/22	JRM	Worked on opposition to motion to dismiss[0.8]; continued to work on same[0.2].	1.0	\$ 725.00	\$ 725.00
04/05/22	JRM	Worked on joint status report[0.5]; continued to work on same[2.7].	3.2	\$ 725.00	\$ 2,320.00
04/06/22	JRM	Video conference with Mr. Payson and Ms. Rainwater regarding 26(f)[0.6]; followed up with same[0.5].	1.1	\$ 725.00	\$ 797.50
04/08/22	JRM	Telephone conference with Ms. Rios regarding schedule[0.1]; followed up with same[0.1].	0.2	\$ 725.00	\$ 145.00
04/19/22	JRM	Reviewed edits to JSR[0.2].	0.2	\$ 725.00	\$ 145.00
04/20/22	JRM	Reviewed and revised JSR[0.2].	0.2	\$ 725.00	\$ 145.00
04/27/22	JRM	Commenced review of discovery requests[0.3]; continued to review same[0.5]; continued to work on same[0.2]; continued to work on same[0.7].	1.7	\$ 725.00	\$ 1,232.50
04/28/22	JRM	Worked on discovery requests[0.5]; continued to work on same[0.7].	1.2	\$ 725.00	\$ 870.00
04/29/22	JRM	Worked on discovery requests[0.1].	0.1	\$ 725.00	\$ 72.50
05/05/22	JRM	Analyzed issues regarding settlement offer[1.0].	1.0	\$ 725.00	\$ 725.00
05/09/22	JRM	Analyzed issues relating to settlement offer[1.3]; telephone conference with opposing counsel regarding defendant's motion to stay[0.2]; followed up with same[0.3].	1.8	\$ 725.00	\$ 1,305.00

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05/10/22	JRM	Prepared for call with court regarding Robinhood's request for stay[0.3]; telephone call from Mr. Payson regarding motion to stay[0.2].	0.5	\$ 725.00	\$ 362.50
05/11/22	JRM	Drafted addition to paragraph to the court[0.7]; revised draft email[0.2].	0.9	\$ 725.00	\$ 652.50
05/12/22	JRM	Email correspondence regarding Robinhood's request for stay[0.1]; telephone call from Mr. Payson[0.1]; revised email to court[0.3]; followed up regarding same[0.3].	0.8	\$ 725.00	\$ 580.00
05/18/22	JRM	Telephone conference with team regarding discovery supplementation and motion to stay[1.0].	1.0	\$ 725.00	\$ 725.00
05/24/22	JRM	Attended hearing on Robinhood's motion to stay[0.3]; followed up with same[0.2].	0.5	\$ 725.00	\$ 362.50
06/06/22	JRM	Reviewed and revised draft protective order[0.7].	0.7	\$ 725.00	\$ 507.50
06/23/22	JRM	Personal conference on ██████████ memorandum[0.5].	0.5	\$ 725.00	\$ 362.50
07/27/22	JRM	Reviewed ██████████ memorandum[0.5]; continued to work on same[3.0].	3.5	\$ 725.00	\$ 2,537.50
08/05/22	JRM	Worked on joint status report and case schedule[1.0]; continued to work on same[0.7].	1.7	\$ 725.00	\$ 1,232.50
08/08/22	JRM	Worked on ██████████ memorandum[1.0]; continued to work on same[1.8].	2.8	\$ 725.00	\$ 2,030.00
08/10/22	JRM	Telephone conference with team regarding next steps[0.5]; revised draft proposed schedule[0.5].	1.0	\$ 725.00	\$ 725.00
08/17/22	JRM	Revised JSR and email correspondence regarding same[0.3].	0.3	\$ 725.00	\$ 217.50
08/23/22	JRM	Reviewed documents produced from Gordon[2.5].	2.5	\$ 725.00	\$ 1,812.50
08/24/22	JRM	Reviewed and outlined deposition testimony[0.4]; continued to work on same[3.5].	3.9	\$ 725.00	\$ 2,827.50
08/29/22	JRM	Worked on list of data points needed for second set of discovery[1.0]; continued to work on same[0.5].	1.5	\$ 725.00	\$ 1,087.50
08/31/22	JRM	Reviewed edits to joint status report and email correspondence regarding same[0.2].	0.2	\$ 725.00	\$ 145.00
10/10/22	JRM	Analyzed issues relating to ██████████ [0.5].	0.5	\$ 725.00	\$ 362.50
10/12/22	JRM	Revised meet and confer letter[1.0].	1.0	\$ 725.00	\$ 725.00
10/26/22	JRM	Prepared for meet and confer[0.5]; attended meet and confer[1.0]; followed up with same[0.8].	2.3	\$ 725.00	\$ 1,667.50
11/08/22	JRM	Video conference regarding meet and confer[1.0].	1.0	\$ 725.00	\$ 725.00

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12/01/22	JRM	Telephone conference with opposing counsel regarding discovery issues[0.5]; followed up with same[0.5].	1.0	\$ 725.00	\$ 725.00
12/06/22	JRM	Reviewed and revised discovery letter[0.5].	0.5	\$ 725.00	\$ 362.50
12/09/22	JRM	Worked on stipulated motion for entry of a case schedule[0.5]; continued to work on same[1.5].	2.0	\$ 725.00	\$ 1,450.00
12/21/22	JRM	Telephone conference with client regarding discovery responses[1.0].	1.0	\$ 725.00	\$ 725.00
01/06/23	JRM	Reviewed draft discovery responses and email correspondence regarding same[0.2].	0.2	\$ 725.00	\$ 145.00
01/20/23	JRM	Telephone conference with Ms. Rios regarding discovery follow up[0.2]; followed up with same[0.1]; drafted proposed order and email communications regarding same[0.2].	0.5	\$ 725.00	\$ 362.50
01/21/23	JRM	Reviewed discovery tracking chart and analyzed issues regarding follow up and motion to compel[0.7].	0.7	\$ 725.00	\$ 507.50
01/24/23	JRM	Revised discovery letter[0.3].	0.3	\$ 725.00	\$ 217.50
01/26/23	JRM	Reviewed order regarding case schedule and email correspondence regarding same[0.2].	0.2	\$ 725.00	\$ 145.00
01/31/23	JRM	Telephone conference with team regarding strategy for completing discovery[1.0]; reviewed discovery letter and analyzed issues regarding same[0.2].	1.2	\$ 725.00	\$ 870.00
02/02/23	JRM	Telephone conference with Ms. Verkhovskaya regarding identifying Washington residents[0.5].	0.5	\$ 725.00	\$ 362.50
02/07/23	JRM	Reviewed memo on [REDACTED] [0.1]; email correspondence regarding same[0.1].	0.2	\$ 725.00	\$ 145.00
02/08/23	JRM	Videoconference with Ms. Rainwater and Mr. Payson regarding discovery meet and confer[1.5]; followed up with same[0.3].	1.8	\$ 725.00	\$ 1,305.00
02/22/23	JRM	Worked on motion to compel[1.5]; continued to work on same[1.0]; telephone conference with Ms. Rios to analyze issues relating to motion to compel[0.5]; worked on motion to compel[2.0].	5.0	\$ 725.00	\$ 3,625.00
02/23/23	JRM	Worked on motion to compel[1.5].	1.5	\$ 725.00	\$ 1,087.50
02/24/23	JRM	Email correspondence regarding discovery dispute[0.1]; drafted summary of issues for judge[0.7].	0.8	\$ 725.00	\$ 580.00

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03/01/23	JRM	Drafted email to send to court summarizing discovery dispute[0.3]. Videoconference with co-counsel regarding [REDACTED] [0.4]; followed up with	0.3	\$ 725.00	\$ 217.50
03/09/23	JRM	same[1.6].	2.0	\$ 725.00	\$ 1,450.00
03/13/23	JRM	Telephone conference with team regarding subpoena objections[0.7]; followed up with same[0.1]; analyzed issues regarding relevance of [REDACTED] [0.3].	1.1	\$ 725.00	\$ 797.50
03/15/23	JRM	Email correspondence regarding motion to quash[0.2]; videoconference with opposing counsel regarding meet and confer about discovery requests[0.7]; followed up regarding same[0.3]; worked on issues relating to motion to quash and privacy[0.2].	1.4	\$ 725.00	\$ 1,015.00
03/16/23	JRM	Worked on motion to quash subpoena[1.0].	1.0	\$ 725.00	\$ 725.00
03/17/23	JRM	Worked on issues relating to motions to quash[0.1]; reviewed and revised motion to quash[0.5].	0.6	\$ 725.00	\$ 435.00
03/18/23	JRM	Analyzed issues relating to motions to quash[0.1].	0.1	\$ 725.00	\$ 72.50
03/21/23	JRM	Reviewed motions to quash and telephone conference regarding same[0.5].	0.5	\$ 725.00	\$ 362.50
03/22/23	JRM	Attended hearing on discovery issues and followed up with same[1.2].	1.2	\$ 725.00	\$ 870.00
03/24/23	JRM	Reviewed and revised discovery responses[0.5]; continued to revise same[0.1].	0.6	\$ 725.00	\$ 435.00
03/27/23	JRM	Worked on search terms[0.5].	0.5	\$ 725.00	\$ 362.50
03/28/23	JRM	Worked on subpoena to Verizon for Mr. Gillette's records[0.5]; email correspondence regarding subpoena consent form and revised same[0.2].	0.7	\$ 725.00	\$ 507.50
03/30/23	JRM	Telephone conference with opposing counsel regarding discovery extension[0.3]; email correspondence about subpoena[0.1].	0.4	\$ 725.00	\$ 290.00
03/31/23	JRM	Analyzed issues relating to supplemental discovery[0.5].	0.5	\$ 725.00	\$ 362.50
04/05/23	JRM	Analyzed discovery issues[0.3].	0.3	\$ 725.00	\$ 217.50
04/14/23	JRM	Video call from co-counsel regarding case strategy[0.5].	0.5	\$ 725.00	\$ 362.50
04/17/23	JRM	Reviewed and revised reply in support of motion to quash[0.2].	0.2	\$ 725.00	\$ 145.00
04/18/23	JRM	Reviewed oppositions to quash and email correspondence regarding same[0.3].	0.3	\$ 725.00	\$ 217.50
05/08/23	JRM	Telephone conference with opposing counsel regarding discovery meet and confer[1.0].	1.0	\$ 725.00	\$ 725.00

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05/15/23	JRM	Telephone conference with opposing counsel regarding data production[0.5].	0.5	\$ 725.00	\$ 362.50
05/16/23	JRM	Analyzed issues relating to search terms[0.4].	0.4	\$ 725.00	\$ 290.00
05/22/23	JRM	Email correspondence regarding Behunin deposition[0.1].	0.1	\$ 725.00	\$ 72.50
06/01/23	JRM	Analyzed issues relating to deposition of Behunin[1.0]; continued to work on deposition preparation[0.5].	1.5	\$ 725.00	\$ 1,087.50
06/02/23	JRM	Prepared for deposition of Mr. Behunin[0.2]; continued to work on same[0.3]; video conference with team regarding Behunin deposition[0.5]; continued to work on same[1.5]; worked on deposition outline for Behunin deposition[2.0].	4.5	\$ 725.00	\$ 3,262.50
06/05/23	JRM	Prepared for deposition[0.5]; continued to prepare for same[0.5]; attended deposition[2.0]; followed up with same[0.3].	3.3	\$ 725.00	\$ 2,392.50
06/06/23	JRM	Telephone call from Aaron Woolfson[0.2]; followed up regarding same[0.2].	0.4	\$ 725.00	\$ 290.00
06/12/23	JRM	Videoconference with Mr. Woolfson regarding expert retention[0.8]; followed up with same[0.2].	1.0	\$ 725.00	\$ 725.00
06/22/23	JRM	Attended suspended deposition of Ms. Siegel[0.7]; followed up with same[0.3].	1.0	\$ 725.00	\$ 725.00
06/23/23	JRM	Analyzed discovery issues[0.3]; analyzed issues regarding discovery letter[0.4].	0.7	\$ 725.00	\$ 507.50
06/26/23	JRM	Teams conference with Ms. Rios regarding meet and confer[0.2]; videoconference with Robinhood's counsel regarding document production[1.0]; followed up with same[0.2]; analyzed issues regarding schedule[0.2].	1.6	\$ 725.00	\$ 1,160.00
06/29/23	JRM	Attended deposition of Ms. Siegel[3.5]; videoconference meet and confer regarding Plaintiffs' discovery responses[0.8]; followed up with same[0.5].	4.8	\$ 725.00	\$ 3,480.00
07/05/23	JRM	Analyzed expert issues[0.2].	0.2	\$ 725.00	\$ 145.00
07/07/23	JRM	Drafted stipulation to extend deadlines[0.4].	0.4	\$ 725.00	\$ 290.00
07/10/23	JRM	Telephone conference with Ms. Rios regarding Plaintiffs' discovery responses[0.5]; analyzed issues relating to public disclosure request and email correspondence regarding same[0.5].	1.0	\$ 725.00	\$ 725.00
07/11/23	JRM	Reviewed edits to stipulated motion for extension of time and email regarding same[0.1]; reviewed draft email regarding plaintiffs' discovery[0.1].	0.2	\$ 725.00	\$ 145.00
07/13/23	JRM	Worked on discovery issues[0.5].	0.5	\$ 725.00	\$ 362.50
07/19/23	JRM	Worked on discovery issues[1.0].	1.0	\$ 725.00	\$ 725.00

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07/20/23	JRM	Analyzed issues regarding discovery[0.5]; reviewed draft discovery responses and email correspondence regarding same[0.5]; worked on discovery responses[0.5].	1.5	\$ 725.00	\$ 1,087.50
07/28/23	JRM	Reviewed and revised discovery responses[0.5].	0.5	\$ 725.00	\$ 362.50
07/31/23	JRM	Email correspondence regarding subpoenas and next steps[0.1]; attended team meeting on expert report[1.0].	1.1	\$ 725.00	\$ 797.50
08/01/23	JRM	Reviewed subpoena documents and email correspondence regarding same[0.4].	0.4	\$ 725.00	\$ 290.00
08/03/23	JRM	Telephone conference with Mr. Woolfson regarding report[1.0]; reviewed draft subpoena to Branch[0.1]; analyzed issues regarding remaining discovery[0.5].	1.6	\$ 725.00	\$ 1,160.00
08/07/23	JRM	Videoconference with opposing counsel regarding meet and confer on 30(b)(6) topics[1.0].	1.0	\$ 725.00	\$ 725.00
08/09/23	JRM	Analyzed issues relating to subpoenas[0.1]; videoconference with Ms. Rainwater regarding subpoena to Branch[0.5]; followed up regarding same[0.5].	1.1	\$ 725.00	\$ 797.50
08/11/23	JRM	Telephone conference with expert regarding report status[0.5]; telephone conference with co-counsel regarding discovery extension[0.1].	0.6	\$ 725.00	\$ 435.00
08/15/23	JRM	Telephone conference with Mr. Sommer regarding subpoena to Branch[0.7].	0.7	\$ 725.00	\$ 507.50
08/16/23	JRM	Analyzed issues related to extension[0.7].	0.7	\$ 725.00	\$ 507.50
08/21/23	JRM	Revised stipulated motion[0.2]; reviewed defendant's draft motion and email regarding same[0.2].	0.4	\$ 725.00	\$ 290.00
08/23/23	JRM	Telephone conference with Branch and followed up with same[0.5].	0.5	\$ 725.00	\$ 362.50
08/29/23	JRM	Telephone conference with Mr. Woolfson regarding expert report[0.3]; followed up regarding same[0.1].	0.4	\$ 725.00	\$ 290.00
08/30/23	JRM	Analyzed issues relating to [REDACTED] [0.2].	0.2	\$ 725.00	\$ 145.00
08/31/23	JRM	Telephone conference with team regarding [REDACTED] [0.7]; followed up with same[0.2].	0.9	\$ 725.00	\$ 652.50
09/01/23	JRM	Worked on letter to Defendant regarding declarations[0.8]; continued to work on same[2.1]; continued to work on same[0.5]; reviewed finals of discovery requests[0.1]; continued to work on discovery letter[0.3]; continued to work on same[0.2].	4.0	\$ 725.00	\$ 2,900.00

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09/05/23	JRM	Telephone conference with co-counsel regarding discovery and mediation[0.5]; analyzed issues regarding expert report[0.4]; email correspondence regarding declarations and analyzed issues regarding same[0.3].	1.2	\$ 725.00	\$ 870.00
09/06/23	JRM	Telephone conference with team regarding [REDACTED] [REDACTED] [0.5]; followed up with same[0.5].	1.0	\$ 725.00	\$ 725.00
09/08/23	JRM	Telephone conference with Ms. Rios regarding discovery issues[0.2]; videoconference with Robinhood's counsel regarding outstanding discovery[0.8]; followed up with same[0.2]; reviewed and analyzed issues regarding expert report and proposed revisions to same[2.2].	3.4	\$ 725.00	\$ 2,465.00
09/14/23	JRM	Attended meet and confer with Mr. Sommer regarding Branch production and followed up regarding same[1.0].	1.0	\$ 725.00	\$ 725.00
09/15/23	JRM	Worked on expert report[0.7]; analyzed issues regarding expert report[0.3].	1.0	\$ 725.00	\$ 725.00
09/18/23	JRM	Reviewed changes to draft expert report and analyzed issues regarding same[0.5]; followed up regarding same[0.3].	0.8	\$ 725.00	\$ 580.00
09/19/23	JRM	Analyzed issues regarding expert report[0.2].	0.2	\$ 725.00	\$ 145.00
09/20/23	JRM	Reviewed 30(b)(6) deposition outline[0.2]; reviewed expert report[0.3].	0.5	\$ 725.00	\$ 362.50
09/21/23	JRM	Telephone conference with expert regarding 30(b)(6) deposition[1.0].	1.0	\$ 725.00	\$ 725.00
09/22/23	JRM	Analyzed issues regarding expert report[0.5]; telephone conference with co-counsel to prepare for meet and confer[0.7]; attended meet and confer[0.5]; followed up with same[0.8].	2.5	\$ 725.00	\$ 1,812.50
09/27/23	JRM	Attended 30(b)(6) deposition[8.5].	8.5	\$ 725.00	\$ 6,162.50
09/29/23	JRM	Attended 30(b)(6) deposition[7.0].	7.0	\$ 725.00	\$ 5,075.00
10/06/23	JRM	Analyzed issues regarding expert report[0.2].	0.2	\$ 725.00	\$ 145.00
10/09/23	JRM	Telephone conference with team regarding deposition follow up and mediation strategy[1.0].	1.0	\$ 725.00	\$ 725.00
10/10/23	JRM	Worked on deposition issues[0.5].	0.5	\$ 725.00	\$ 362.50
10/11/23	JRM	Attended videoconference with Mr. Moore to prepare for deposition[1.5]; followed up with same[0.2]; continued to follow up regarding same[0.3].	2.0	\$ 725.00	\$ 1,450.00
10/13/23	JRM	Attended videoconference regarding deposition prep for Mr. Gillette[0.2]; videoconference with Mr. Gillette to prepare for deposition[1.0].	1.2	\$ 725.00	\$ 870.00

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10/16/23	JRM	Prepared for call with mediator[0.2]; attended call with mediator[0.4]; followed up regarding same[0.5].	1.1	\$ 725.00	\$ 797.50
10/17/23	JRM	Attended deposition preparation session with Mr. Gillete[1.8]; personal conference with Mr. Woolfson and Ms. Nuss regarding data[0.5].	2.3	\$ 725.00	\$ 1,667.50
10/18/23	JRM	Telephone conference with consulting expert regarding notice plan[0.2]; followed up with same[0.2]; attended videoconference with Mr. Moore to prepare for deposition[1.7].	2.1	\$ 725.00	\$ 1,522.50
10/19/23	JRM	Prepared for depositions[2.0]; defended deposition of Mr. Moore[8.5].	10.5	\$ 725.00	\$ 7,612.50
10/20/23	JRM	Defended deposition of Mr. Gillette[7.5]; analyzed ██████████ issue[0.3].	7.8	\$ 725.00	\$ 5,655.00
10/22/23	JRM	Reviewed and revised mediation letter[0.4].	0.4	\$ 725.00	\$ 290.00
10/23/23	JRM	Worked on issues relating to expert report[1.0]; continued to work on same[1.2].	2.2	\$ 725.00	\$ 1,595.00
10/24/23	JRM	Worked on expert report issues[0.6]; continued to work on same[1.7]; continued to work on same[3.9].	6.2	\$ 725.00	\$ 4,495.00
10/25/23	JRM	Reviewed mediation submission and analyzed issues regarding same[0.8]; attended team call to strategise about mediation[1.1]; telephone conference with expert regarding expert report[1.0]; followed up with same[0.2]; continued to work on same[0.4].	3.5	\$ 725.00	\$ 2,537.50
10/26/23	JRM	Worked on ██████████ issue[0.5]; worked on expert report[0.3]; continued to work on same[0.5].	1.3	\$ 725.00	\$ 942.50
10/27/23	JRM	Telephone conference with Mr. Moore regarding mediation[0.6]; telephone conference with Mr. Gillette regarding mediation[0.4]; telephone conference regarding expert report and followed up regarding same[1.0]; reviewed expert report[0.8].	2.8	\$ 725.00	\$ 2,030.00
10/29/23	JRM	Traveled to Los Angeles for mediation[5.0].	5.0	\$ 725.00	\$ 3,625.00
10/30/23	JRM	Attended in-person mediation[6.0]; traveled home[5.0].	11.0	\$ 725.00	\$ 7,975.00
11/02/23	JRM	Analyzed issues regarding retainer agreements[0.2].	0.2	\$ 725.00	\$ 145.00
11/07/23	JRM	Reviewed subpoena[0.1].	0.1	\$ 725.00	\$ 72.50
11/08/23	JRM	Telephone conference with Ms. Rios regarding mediation update and next steps[0.2].	0.2	\$ 725.00	\$ 145.00

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11/13/23	JRM	Analyzed issues regarding mediation and discovery[0.5]; analyzed issues regarding expert report[0.4].	0.9	\$ 725.00	\$ 652.50
11/14/23	JRM	Telephone conference with team regarding mediation[1.0]; worked on letter to Mr. Meyer regarding defendant's survey[1.5]; continued to work on same[1.9].	4.4	\$ 725.00	\$ 3,190.00
11/15/23	JRM	Revised letter to Mr. Meyer regarding survey[0.2]; followed up with same[0.1]; continued to revise same[0.5].	0.8	\$ 725.00	\$ 580.00
11/16/23	JRM	Email correspondence regarding mediation[0.2]; email correspondence regarding expert report[0.1].	0.3	\$ 725.00	\$ 217.50
11/20/23	JRM	Telephone conference with Mr. Meyer regarding settlement[0.4]; followed up with same[0.3].	0.7	\$ 725.00	\$ 507.50
11/22/23	JRM	Worked on discovery issues[0.5].	0.5	\$ 725.00	\$ 362.50
11/27/23	JRM	Analyzed issues necessary to button up settlement[0.5]; revised term sheet[1.0]; continued to work on settlement issues[1.0].	2.5	\$ 725.00	\$ 1,812.50
11/30/23	JRM	Worked on settlement issues[0.2].	0.2	\$ 725.00	\$ 145.00
12/06/23	JRM	Reviewed and revised settlement agreement[1.3].	1.3	\$ 725.00	\$ 942.50
01/02/24	JRM	Reviewed changes to settlement agreement and analyzed issues regarding same[0.5]; telephone conference with co-counsel regarding case strategy[0.8]; followed up with same[0.1].	1.4	\$ 725.00	\$ 1,015.00
01/04/24	JRM	Telephone conference with Robinhood's counsel regarding settlement agreement edits[0.7]; followed up with same[0.3].	1.0	\$ 725.00	\$ 725.00
01/10/24	JRM	Reviewed and revised settlement documents and created timeline[1.3]; analyzed issues regarding same[0.3].	1.6	\$ 725.00	\$ 1,160.00
01/17/24	JRM	Worked on settlement issues[0.1].	0.1	\$ 725.00	\$ 72.50
01/19/24	JRM	Analyzed issues regarding settlement administration[0.2]; telephone conference with co-counsel regarding same[0.1].	0.3	\$ 725.00	\$ 217.50
01/23/24	JRM	Reviewed and revised notices[0.2]; reviewed admin bids and did a rough apples to apples comparison[0.7]; telephone conference with co-counsel regarding notices and admin bids[0.8].	1.7	\$ 725.00	\$ 1,232.50
01/24/24	JRM	Telephone conference with JND regarding notice bid[0.3]; followed up regarding same[0.4]; analyzed preliminary approval issues[1.0].	1.7	\$ 725.00	\$ 1,232.50
01/26/24	JRM	Reviewed draft notices[0.2]; worked on draft claim form[0.3].	0.5	\$ 725.00	\$ 362.50

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01/29/24	JRM	Analyzed issues regarding notice and claim form[0.5]; reviewed preliminary approval motion and revised same[0.5]; telephone conference with Ms. Keough regarding settlement[0.2].	1.2	\$ 725.00	\$ 870.00
02/01/24	JRM	Reviewed and revised preliminary approval motion[2.5].	2.5	\$ 725.00	\$ 1,812.50
02/02/24	JRM	Reviewed and revised notices[1.1]; continued to analyze issues regarding same[0.5]. Worked on motion for preliminary approval and supporting documents[1.5]; reviewed administrator declaration and added citations to motion[1.4]; email correspondence regarding status report and motion for overlength[0.1]; worked on finalizing status report and motion for overlength[0.2].	1.6	\$ 725.00	\$ 1,160.00
02/05/24	JRM	Worked on preliminary approval papers[0.2]; continued to work on same[0.5]; continued to work on same[0.4].	3.2	\$ 725.00	\$ 2,320.00
02/06/24	JRM	Reviewed exhibits and email correspondence regarding same[0.2].	1.1	\$ 725.00	\$ 797.50
02/07/24	JRM	Reviewed changes to preliminary approval motion[0.1]; email correspondence regarding same[0.1]; worked on finalizing preliminary approval documents[0.1]; continued to work on same[0.4].	0.2	\$ 725.00	\$ 145.00
02/08/24	JRM	Reviewed changes to preliminary approval motion[0.1]; email correspondence regarding same[0.1]; worked on finalizing preliminary approval documents[0.1]; continued to work on same[0.4].	0.7	\$ 725.00	\$ 507.50
02/12/24	JRM	Worked on settlement timeline and email correspondence regarding same[0.5]. Telephone conference with co-counsel regarding notices[0.1]; followed up with same[0.1].	0.5	\$ 725.00	\$ 362.50
02/22/24	JRM	Reviewed and revised long form notice[0.2].	0.2	\$ 725.00	\$ 145.00
02/25/24	JRM		0.2	\$ 725.00	\$ 145.00
		Statement Professional: Jennifer Murray	297.0		\$ 215,325.00
05/19/23	KB	Revised, finalized, and filed pro hac vice application for Mark DeSanto[0.5].	0.5	\$ 225.00	\$ 112.50
06/02/23	KB	Drafted cross-notice of deposition and subpoena enforcing the same[0.9].	0.9	\$ 225.00	\$ 202.50
07/07/23	KB	Drafted stipulated motion to extend deadlines and updated caption to reflect new appearances of pro hac vice attorneys[0.5].	0.5	\$ 225.00	\$ 112.50
07/11/23	KB	Finalized and filed stipulated motion to extend deadlines and provided the word version to the judge[0.3].	0.3	\$ 225.00	\$ 67.50
07/18/23	KB	Contacted court reporter company to identify reason for delay in transcripts, obtained transcripts, and provided the same to filing[0.9].	0.9	\$ 225.00	\$ 202.50

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07/28/23	KB	Revised and finalized requests for admission, interrogatories, and requests for production responses[1.1].	1.1	\$ 225.00	\$ 247.50
08/17/23	KB	Finalized and filed stipulated motion and proposed order to extend deadlines[0.4].	0.4	\$ 225.00	\$ 90.00
08/21/23	KB	Finalized and filed revised stipulated motion and proposed order to extend deadlines[0.3].	0.3	\$ 225.00	\$ 67.50
09/01/23	KB	Revised and finalized subpoena to DWT, second amended notice of 30(b)(6) deposition, fifth set of interrogatories and requests for production to defendants[2.7]; Finalized letter to defense counsel[0.2]; Served correspondence, subpoena to DWT, second amended notice of 30(b)(6) deposition, fifth set of interrogatories and requests for production upon defendants[0.2].	3.1	\$ 225.00	\$ 697.50
09/05/23	KB	Coordinated process service of subpoena for records on DWT[0.2]	0.2	\$ 225.00	\$ 45.00
09/07/23	KB	Confirmed subpoena had been served on DWT[0.1].	0.1	\$ 225.00	\$ 22.50
09/25/23	KB	Revised subpoena form and letter to Cingular Wireless and AT&T regarding resubmission of subpoena for records[0.6]; Revised notice of intent to serve subpoena[0.2].	0.8	\$ 225.00	\$ 180.00
09/26/23	KB	Revised and finalized subpoena package to New Cingular Wireless[0.4]. Coordinated process service of subpoena on New Cingular Wireless[0.1]. Email served AT&T with revised subpoena package per their request and requirements[1]. Coordinated facsimile service of subpoena package on AT&T[0.1]. Served counsel with notice of intent to serve corrected subpoena[0.1]	1.7	\$ 225.00	\$ 382.50
10/23/23	KB	Drafted subpoena to produce documents to Consumer Cellular[0.2].	0.2	\$ 225.00	\$ 45.00
10/30/23	KB	Drafted letter to Consumer Cellular re subpoena for records[0.1].	0.1	\$ 225.00	\$ 22.50
11/07/23	KB	Drafted notice of intent to serve subpoena to Consumer Cellular, finalized the same, and served on counsel with subpoena[0.3]; Prepared service packet to Consumer Cellular and coordinated the process service of the same[0.3].	0.6	\$ 225.00	\$ 135.00
11/14/23	KB	Drafted confidential mediation submission shell[0.1].	0.1	\$ 225.00	\$ 22.50
11/30/23	KB	Followed up with process server regarding service on CashApp[0.2]. Updated term sheet to include plaintiff signature[0.1].	0.3	\$ 225.00	\$ 67.50

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02/02/24	KB	Began drafting adequacy declaration[0.2]. Finished drafting adequacy declaration[0.4]; Drafted motion for leave to file overlength brief shell and accompanying proposed order[0.3]; Finalized motion for leave to file overlength brief and proposed order[0.4]; Finalized joint status report[0.1]; Filed joint status report with the court[0.1]; Filed motion for leave and proposed order with the court[0.2].	0.2	\$ 225.00	\$ 45.00
02/05/24	KB	Reformatted, revised, and created tables of contents and authorities for motion for preliminary approval[2.7]; Formatted declarations in support of motion for preliminary approval[0.3]; Formatted proposed order regarding preliminary approval motion[0.3].	1.5	\$ 225.00	\$ 337.50
02/06/24	KB	Finalized Terrell declaration in support of preliminary approval motion[0.3]; Finalized Drake declaration in support of preliminary approval motion[0.3]; Revised and finalized proposed order[0.2]; Finalized preliminary approval motion[0.2]; Filed preliminary approval motion with the court and emailed proposed order to judge[0.4].	3.3	\$ 225.00	\$ 742.50
02/08/24	KB	Revised issuance of subpoena form and attestation packet[0.3]; Filed issuance of subpoena form and attestation packet with the court[0.2].	1.4	\$ 225.00	\$ 315.00
02/08/24	KB		0.5	\$ 225.00	\$ 112.50
		Statement Professional: Krystal Brown	19.0		\$ 4,275.00
		Grand Total	639.8		\$ 308,454.00