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13 Attorneys for Plaintiff and the Class

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 OAKLAND DIVISION

17 ROHINI KUMAR, individual, on behalf of
18 herself, the general public and those similarly
situated

19 Plaintiff,

20 v.

21 SALOV NORTH AMERICA CORPORATION,
22
23 Defendant.

CASE NO. 12-cv-04936 (LB)

**DECLARATION OF HASSAN A.
ZAVAREEI IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND
APPLICATION FOR ATTORNEYS'
FEES, COSTS AND INCENTIVE
AWARDS**

Date: May 30, 2017

Time: 2:00 p.m.

Courtroom 1, Fourth Floor

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Hassan Zavareei, declare as follows:

2 1. I am a member of this Court and attorney of record for Plaintiff Rohini Kumar in
3 this action.

4 2. I am a partner Tycko & Zavareei LLP (“TZ” or “Firm”), which has been appointed
5 Class Counsel in the above-captioned matter. The information below is stated based on personal
6 knowledge. I am competent to testify to the facts set forth below, and if called as a witness and
7 placed under oath, I would testify to those facts.

8 3. I make this Declaration in support of Plaintiff’s motion for final approval and
9 attorneys’ fees and costs and incentive awards (“Motion”). In that regard, I discuss, in the
10 following order: (a) the history of this litigation, which includes a summary description of the legal
11 services provided by TZ in this litigation to date; (b) the risks borne by TZ; (c) the time, rate,
12 expenses, and other data underlying the Motion; and (d) TZ’s continuing obligations in this
13 litigation and under the Settlement Agreement.

14 **A. History of the Litigation.**

15 4. Prior to becoming co-counsel with the Gutride Safier firm (“GSLLP”) in this
16 matter, TZ had litigated several matters related to several olive oil brands, including Filippo Berio,
17 against retailers in Washington, D.C., under the D.C. Consumer Protection Procedures Act
18 (“CPPA”). During the D.C. CPPA litigation, TZ conducted significant investigation relating to the
19 “Imported from Italy” claims at issue in this litigation, including analyzing Food and Drug
20 Administration (“FDA”) regulations and Customs and Border Patrol (“CBP”) regulations. TZ also
21 conducted research regarding potential federal preemption of Plaintiff’s claims. Throughout this
22 litigation, TZ has continued to monitor, research, and review such materials.

23 5. Prior to filing Plaintiff’s response to the motion to dismiss in this matter, TZ
24 entered an appearance as co-counsel to GSLLP in this matter. Throughout the litigation, TZ
25 worked closely with GSLLP to formulate case strategy. Work was divided between the firms to
26 avoid duplication—for example, the TZ firm was assigned to be lead on taking depositions of fact
27 witnesses, while my firm was lead for dealing with the expert witnesses. Document review was
28 apportioned between the firms and only documents identified as by a reviewer as “hot documents”

1 were shared. Similarly, in connection with legal research and brief writing, one firm was assigned
2 to draft all (or certain sections) of a brief, while the other provided only suggestions and edits.

3 6. After filing the Complaint, Defendant filed a motion to dismiss. TZ reviewed
4 Defendant's arguments and assisted in preparing the opposition to that motion, which was filed in
5 August of 2014.

6 7. In November of 2015, Defendant filed a motion to stay the proceedings in this case
7 pending the resolution of purportedly related matters pending on appeal in the Ninth Circuit. TZ
8 reviewed Defendant's arguments on that motion and drafted and filed Plaintiff's opposition in
9 December of 2015.

10 8. Throughout this case, TZ participated in the discovery efforts, including drafting
11 and serving requests on Defendant and third parties. TZ also met-and-conferred with Defendant's
12 counsel regarding the scope of discovery, the sufficiency of discovery responses and production,
13 the retention of electronic documents, Defendant's searches for electronically stored information,
14 the terms and scope of a stipulated protective order, and the timing of production.

15 9. In an effort to obtain discovery from Defendant's Italian parent company, TZ
16 undertook significant research on how to obtain foreign discovery pursuant to the Hague
17 Convention on the Taking of Evidence Abroad in Civil or Commercial Matters ("Hague
18 Convention"). In addition to this research, TZ drafted a proposed Letter of Request for discovery
19 pursuant to the Hague Convention, along with a motion for issuance of the Letter of Request and a
20 reply memorandum in support thereof.

21 10. In total, over 30,000 pages of documents were produced in this case, and TZ
22 assisted in the document review efforts in this case.

23 11. TZ also took the deposition of Defendant's Rule 30(b)(6) representative, in addition
24 to the depositions of four fact witness employees of Defendant.

25 12. After obtaining significant discovery from Defendant in this case, TZ participated
26 in conducting research for, drafting, and filing Plaintiff's Motion for Class Certification, which
27 was filed in January of 2016. Upon receiving Defendant's opposition to that motion, TZ
28 participated in the research and drafting of Plaintiff's reply memorandum, which was filed in May

1 of 2016. After the class certification motion was submitted, the Court asked for further
2 declarations regarding Class Counsel's qualifications and on the pending motions to seal portions
3 of the briefing, on which TZ participated in the drafting and filing.

4 13. After the Court granted Plaintiff's Motion for Class Certification, the parties started
5 to discuss the possibilities of mediation and settlement in August 2016 (Dkt. 130). After initial
6 settlement efforts stalled, the parties agreed to mediation, and TZ drafted a comprehensive
7 mediation statement. On November 8, 2016, Anna Haac and Andrew Silver from TZ attended an
8 all-day mediation (10+ hours) with Randy Wulff of Wulff Quinby & Sochynsky, an independent,
9 well respected, and experienced mediator, in Oakland, California. The parties made significant
10 progress during the mediation, and following the mediation, TZ participated in negotiating and
11 drafting the Settlement Agreement along with corresponding documents, including claim forms,
12 summary notice, and long form notice.

13 14. Because the parties were able to arrive at a nationwide settlement, TZ drafted an
14 Amended Complaint in this matter which asserted nationwide claims consistent with the
15 nationwide settlement class contemplated by the Settlement Agreement.

16 15. After the parties entered into the Settlement Agreement, TZ drafted the motion for
17 preliminary approval of the settlement and its supporting documents. Anna Haac appeared at the
18 hearing on this motion.

19 16. TZ also drafted the instant motion for final approval of the settlement.

20 17. TZ's work in this case is delineated in even greater detail in the contemporaneous
21 time entries attached to this Declaration, as discussed in Section C.

22 18. Should any objections to the settlement be filed prior to the hearing on final
23 approval, TZ will research and respond to those objections by, if necessary, filing oppositions to
24 them and/or a reply memorandum in support of the motion for final approval of the settlement.

25 19. After engaging in all of the aforementioned tasks, as a partner with TZ, I am in a
26 unique position to evaluate this Settlement. Indeed, in advising the Representative Plaintiff
27 whether or not to enter into the Settlement Agreement, I was very cognizant of the risks involved
28 in protracted litigation. I was also cognizant of Defendant's size and financial resources.

1 20. When considering the risks and costs associated with proceeding to trial against the
2 nature of the benefit that was being offered by Defendant, I believe that the Settlement is in the
3 best interests of the class. Indeed, with this Settlement, Plaintiff has achieved her desired goal in
4 this litigation—i.e., obtaining for class members cash refunds and changes to Defendant’s labeling
5 practices. Based on my evaluation of the facts and legal issues presented, I believe that the
6 settlement is fair, adequate, and reasonable.

7 **B. The Risks Borne By TZ.**

8 21. In accepting this case, TZ bore considerable risk. TZ took this case on a fully
9 contingent basis, meaning that we were not paid for any of our time, and that we paid all costs and
10 out of pocket expenses without any reimbursement to date. From the outset, TZ recognized that it
11 would be contributing a substantial amount of time and advancing significant costs in prosecuting
12 this class action, with no guarantee of compensation or recovery, in the hopes of prevailing against
13 a well-funded defense.

14 22. Because Defendant was represented by a large, highly-skilled and well-resourced
15 litigation firm, there was increased risk that Plaintiff would receive a verdict for the Defense after
16 a prolonged trial.

17 **C. Lodestar and Expenses for TZ**

18 23. A true and correct copy of the firm resume of TZ was submitted as part of the class
19 certification briefing the Court reviewed in certifying a California class. (Dkt. 85-10.)

20 24. Based on the time records of TZ, TZ has spent approximately 1,003.7 hours
21 prosecuting this litigation through April 6, 2017.¹ The total number of hours, as well as the
22 lodestar computed at our 2017 rates, is as shown in the following table:

Attorney (Position)	Hours	Rate	Total
Hassan Zavareei (Partner)	74	\$826.00	\$61,124.00
Jeffrey Kaliel (Partner)	46.3	\$685.00	\$31,715.50
Anna Haac (Partner)	241.4	\$685.00	\$165,359.00

27
28 ¹ TZ will update its lodestar and costs in a reply declaration, as necessary.

Attorney (Position)	Hours	Rate	Total
Andrew Silver (Associate)	442.30	\$421.00	\$186,208.30
Sophia Goren (Associate)	0.10	\$343.00	\$34.30
Michael Brody (Counsel)	96.00	\$343.00	\$32,928.00
Nathan Laporte (Paralegal)	13.60	\$187.00	\$2,543.20
Sydney Teng (Paralegal)	71.40	\$187.00	\$13,351.80
Amy Berkowitz (Paralegal)	18.20	\$187.00	\$3,403.40
Audrey Abate (Paralegal)	0.40	\$187.00	\$74.80
TOTAL	1003.70		\$496,667.50

25. As requested by the Court during the hearing on Plaintiff's preliminary approval motion, attached hereto as Exhibit A is a true and correct copy of the contemporaneous billing records entered and maintained by TZ for the hours worked summarized in the above chart.

26. The hourly rates shown for the attorneys at TZ are our 2017 rates charged as delineated by the Laffey Matrix (<http://www.laffeymatrix.com/>), which provides market rates for attorneys working in the Washington, D.C., and Baltimore areas. Although the Laffey Matrix is updated annually, courts have awarded attorneys' fees consistent with the Laffey Matrix to my firm in a number of cases. *See, e.g., Brown v. Transurban USA, Inc.*, No. 1:15CV494 (JCC/MSN), 2016 WL 6909683 (E.D. Va. Sept. 29, 2016); *Small v. BOKF, N.A.*, No. 1:13-cv-01125-REB-MJW (D. Colo.); *Soule v. Hilton Worldwide, Inc.*, No. CV 13-00652 ACK-RLP, 2015 WL 12827769 (D. Haw. Aug. 25, 2015); *Beck v. Test Masters Educ. Servs., Inc.*, 73 F. Supp. 3d 12 (D.D.C. 2014). The Ninth Circuit has accepted the Laffey Matrix as evidence of reasonable hourly rates charged by Washington, D.C. attorneys. *Mancini v. Dan P. Plute, Inc.*, 358 F. App'x 886 (9th Cir. 2009). And a court in this District recently awarded Bay Area attorneys Laffey Matrix fees adjusted *upwardly* by nine percent, so, if anything, the Laffey Matrix comes in *below* the market rate for attorneys in this District. *See Brinker v. Normandin's*, No. 14CV03007EJDHRL, 2017 WL 713554 (N.D. Cal. Feb. 23, 2017) (citing *Theme Promotions, Inc. v. News America Marketing FSI, Inc.*, 731 F. Supp. 2d 937, (N.D. Cal. 2010)).

27. I am a 1995 graduate of University of California, Berkeley School of Law. Jeffrey

1 Kaliel is a 2005 graduate of Yale Law School, Anna Haac is a 2006 graduate of University of
2 Michigan Law School, and Andrew Silver is a 2012 graduate of Boston College Law School.

3 28. I was previously an attorney at the law firm of Gibson Dunn & Crutcher. It is my
4 understanding that attorneys at that firm in the litigation department with the same number of
5 years of experience as myself are currently billing at hourly rates in excess of \$1,000 for law
6 school graduates from 1995. I believe that my firm's hourly rates are at or below market for
7 attorneys with similar backgrounds and experience.

8 29. Expenses are accounted for and billed separately and are not duplicated in my
9 firm's professional billing rate. TZ has not received reimbursement for expenses incurred in
10 connection with this litigation. As of April 7, 2017, my firm incurred a total of \$42,366.14 in
11 unreimbursed actual third-party expenses in connection with the prosecution of these cases. The
12 actual expenses incurred in the prosecution of these cases are reflected on the computerized
13 accounting records of my firm prepared by bookkeeping staff, based on receipts and check
14 records, and accurately reflect all actual expenses incurred. Attached hereto as Exhibit B is a true
15 and correct copy of a listing of expenses incurred in this case by my firm, for which Plaintiff is
16 now seeking reimbursement.

17 **D. Plaintiffs' Counsel Continuing Obligations to Class Members**

18 30. Following this Court granting preliminary approval to the Settlement, Class
19 Counsel established standardized procedures to ensure that all inquiries from Class Members were
20 timely and accurately handled. I am not aware of any feedback from class members that would
21 suggest that the process is onerous or complicated. Class Counsel also worked the Claim
22 Administrator to assure that settlement website functioned properly, was easy to use and properly
23 designed. Class Counsel also worked with the Claims Administrator to assure that notice was
24 disseminated in accordance with the terms of the Settlement Agreement. I received weekly updates
25 from the Claims Administrator regarding the administration of the settlement. TZ will continue in
26 this capacity should the settlement be finally approved. If the settlement is approved and fees
27 awarded, TZ also will oppose any appeals that may be filed. Based on my experience with class
28 actions, I additionally anticipate that there will be another 50-75 hours of work before this

1 Litigation is entirely complete and an estimated 175-250 hours if this Court's judgment is
2 appealed.

3
4 This declaration was executed this 11th day of April, 2017, at Washington, D.C.. I state the
5 foregoing under penalty of perjury under the laws of the United States.

6 /s/ Hassan A. Zavareei
7 Hassan A. Zavareei, Esq.

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EXHIBIT A

Tycko & Zavareei LLP
Kumar v. Salov Lodestar Report

	Position	Rate	Total Hours	Individual Lodestar
H. Zavareei	Partner	\$ 826.00	74.00	\$ 61,124.00
J. Kaliel	Partner	\$ 685.00	46.30	\$ 31,715.50
A. Haac	Partner	\$ 685.00	241.4	\$ 165,359.00
A. Silver	Associate	\$ 421.00	442.30	\$ 186,208.30
S. Goren	Associate	\$ 343.00	0.10	\$ 34.30
M. Brody	Counsel	\$ 343.00	96.00	\$ 32,928.00
A. Berkowitz	Paralegal	\$ 187.00	13.60	\$ 2,543.20
S. Teng	Paralegal	\$ 187.00	71.40	\$ 13,351.80
N. Laporte	Paralegal	\$ 187.00	18.20	\$ 3,403.40
A. Abate	Paralegal	\$ 187.00	0.40	\$ 74.80
Total:			1003.70	\$ 496,667.50

Tycko & Zavareei LLP

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Ph:(202) 973-0900

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April 6, 2017

File #: 248-03

Attention:

RE: Kumar v. Salov North America Corp. and ItalFoods, Inc.

DATE	DESCRIPTION	HOURS	LAWYER
Oct-31-13	Research for EVOO/IFI claims against Salov.	3.20	ACH
Nov-01-13	Research for EVOO/IFI claims against Salov.	1.50	ACH
Nov-05-13	Research for EVOO/IFI claims against Salov.	1.90	ACH
Nov-18-13	Research for EVOO/IFI claims against Salov.	0.50	ACH
Nov-22-13	Call with CA law firm re: EVOO/IFI case.	0.70	ACH
Aug-05-14	Discuss response to MTD with A. Silver.	0.20	ACH
	Discuss opp. to mot. to dismiss w/ A. Haac	0.20	AJS
	Conerence call w/ co-counsel RE opp. to mot. to dismiss	0.30	AJS
Aug-07-14	Drafting opp'n to MTD.	5.80	ACH
Aug-08-14	Editing opposition to MTD.	2.90	HAZ
	Drafting opp'n to MTD.	5.40	ACH
	Discuss contract claims with A. Silver.	0.20	ACH

	Discuss contract claims RE opp. to MTD w/ A. Haac and A. Berkowitz	0.20	AJS
Aug-10-14	Review and edit contract claims section in MTD and cases cited therein	2.50	AJS
Aug-11-14	Drafting Opp'n To MTD.	10.20	ACH
	Draft section of opp. to MTD RE contract claims	2.10	AJS
	Edit Plaintiff's Opposition to Motion to Dismiss	3.40	ABB
Aug-18-14	Review and edit CMC.	0.50	JK
Sep-23-14	Review case file for retailer subpoenas; email K. Simplicio RE same	0.10	AJS
Sep-29-14	Discuss case status with Silver.	0.10	HAZ
	Discuss case status w/ H. Zavareei	0.10	AJS
Oct-01-14	Discuss hearing with A. Silver.	0.20	HAZ
	Discuss MTD hearing w/ H. Zavareei	0.20	AJS
Oct-21-14	Review order denying relief from magistrate order RE stay	0.10	AJS
Dec-02-14	Draft email to H. Zavareei w/ case update	0.50	AJS
Dec-11-14	Internal and external correspondence.	1.50	ACH
Dec-18-14	Correspondence with co-counsel	0.10	ACH
Jan-07-15	Conference call w/ co-counsel RE discovery	0.30	AJS
Feb-03-15	Review MTD order	0.50	HAZ
	Review order RE motion to dismiss	0.30	AJS
	Draft press release RE mot. to dismiss	1.50	AJS
Feb-04-15	Finalize press release	0.70	AJS

	Publish press releases	0.60	ABB
Feb-09-15	Conference call w/ co-counsel RE case status	0.10	AJS
Feb-13-15	Draft IRI subpoena	0.40	AJS
Feb-16-15	Finish draft IRI subpoena	1.00	AJS
Feb-17-15	Review and revise draft CMS statement	0.30	AJS
Feb-19-15	T/c w/ K. Simplicio RE case status	0.20	AJS
Feb-25-15	Meeting with Silver and Haac	0.10	HAZ
	Review answer	0.20	AJS
	Conference call w/ co-counsel RE case status	0.30	AJS
	Discuss open tasks w/ H. Zavareei and A. Haac	0.10	AJS
Mar-02-15	Email K. Simplicio RE retailer subpoenas	0.10	AJS
Mar-03-15	T/c w/ K. Simplicio RE retailer subpoenas	0.10	AJS
Mar-10-15	Meeting with Haac, Silver and Kaliel.	0.20	HAZ
	Reviewing Salov answer.	0.30	ACH
	Discuss open tasks w/ A. Haac, H. Zavareei and J. Kaliel	0.20	AJS
Mar-12-15	Reviewing protective order, depositions, and related correspondence from Mostafi to determine relevance and produceability.	1.40	ACH
	Email A. Haac RE Salov meet & confer	0.10	AJS
	Prepare draft retailer subpoena template; email H. Zavareei, A. Haac and J. Kaliel RE same	0.80	AJS
	Discuss retailer subpoenas w/ A. Berkowitz	0.10	AJS
Mar-16-15	Revise draft retailer subpoenas; email co-counsel RE same	0.10	AJS

	Review A. Berkowitz email RE retailer subpoenas; email A. Berkowitz RE same	0.10	AJS
	Research registered agent information for subpoenas	0.70	ABB
Mar-17-15	Reviewing Salov discovery responses, drafting M&C letter.	1.10	ACH
	Email A. Berkowitz RE retailer subpoenas	0.10	AJS
	Research EVOO retailers for registered agent information for subpoena purposes	0.70	ABB
Mar-19-15	Draft letter and certification form to accompany retailer subpoenas	0.40	AJS
	Email J. Kaliel RE retailer subpoenas	0.10	AJS
Mar-20-15	Reviewing and editing M&C letter.	0.70	HAZ
	Drafting M&C letter.	2.80	ACH
	Email co-counsel RE retailer subpoenas, cover letter, and certification	0.20	AJS
Mar-21-15	Drafting M&C.	5.00	ACH
Mar-22-15	Drafting M&C.	3.00	ACH
Mar-23-15	Drafting M&C.	2.50	ACH
	Review A. Berkowitz email RE document subpoenas; email A. Berkowitz RE same	0.10	AJS
	Finalize and send meet and confer letter	1.30	ABB
Mar-24-15	Drafting ESI Protocol.	0.50	ACH
Mar-25-15	Drafting ESI protocol, reviewing court rules re: same.	0.60	ACH
	Compiling proposed search terms.	1.50	ACH
	Discuss case status and case management w/ A. Haac	0.10	AJS

	Draft/format ESI protocol	0.80	ABB
Mar-26-15	Preparing for discovery call, call with co-counsel re: same, M&C with opposing counsel.	2.10	ACH
	Review correspondence and discovery responses prior to meet-and-confer call w/ opposing counsel	0.30	AJS
	Call w/ K. Simplicio and A. Haac RE discovery and case status	0.20	AJS
	Discuss retailer subpoenas w/ A. Berkowitz	0.10	AJS
	Meet-and-confer RE defendant's discovery responses	1.20	AJS
	Edit ESI protocol	0.30	ABB
Mar-27-15	Salov M&C.	2.20	ACH
	Revising search terms for ESI.	0.30	ACH
	Meet-and-confer w/ opposing counsel RE their discovery responses	2.20	AJS
Mar-31-15	Meeting with team regarding discovery issues.	0.80	HAZ
	Team meeting re: discovery.	0.80	ACH
	Conference call RE case management w/ K. Simplicio and A. Haac	0.40	AJS
Apr-01-15	Reviewing search terms, call with co-counsel.	1.40	ACH
	Begin drafting follow-up meet & confer	1.90	AJS
Apr-02-15	Continue drafting follow-up meet-and-confer	3.70	AJS
Apr-03-15	Internal and external correspondence.	2.10	ACH
	Discuss meet-and-confer w/ A. Haac	0.20	AJS
	Edit ESI protocol	0.20	ABB

Apr-06-15	Correspondence with opposing counsel.	0.20	ACH
Apr-07-15	Reviewing org chart, internal and external correspondence.	1.00	ACH
	Calendar deadlines	0.20	ABB
Apr-10-15	M&C.	1.50	ACH
Apr-13-15	Conference call with co-counsel regarding strategy.	0.80	HAZ
	EVOO conference call, correspondence with co-counsel.	0.80	ACH
Apr-16-15	EVOO call with co-counsel and opposing counsel.	2.00	ACH
	Discuss open tasks w/ A. Haac and K. Simplicio before and after meet-and-confer w/ opposing counsel	1.10	AJS
	Meet and confer telephonically with opposing counsel RE discovery	0.90	AJS
Apr-20-15	Calendar discovery response deadlines	0.10	ABB
Apr-21-15	Call re: EVOO and correspondence with co-counsel re: same.	1.10	ACH
Apr-22-15	Reiviewing notes, VM with opposing counsel.	0.20	ACH
Apr-23-15	Call with opposing counsel.	0.30	ACH
	T/c w/ K. Simplicio RE document review; email J. Kaliel RE same	0.20	AJS
Apr-24-15	Research for and draft letter brief RE lobbying discovery	4.40	AJS
Apr-27-15	Email A. Haac RE discovery responses	0.10	AJS
May-04-15	Correspondence with opposing counsel.	0.30	ACH
May-05-15	Call with co-counsel re: document review.	1.40	ACH
	Email K. Simplicio RE RFP responses	0.10	AJS

	Upload Defendant's document production	0.20	ABB
May-06-15	Begin drafting discovery responses	1.70	AJS
	Revise draft letter brief	0.70	AJS
May-08-15	Correspondence with opposing counsel, reviewing search terms.	0.60	ACH
May-11-15	Reviewing documents, call with co-counsel re: same.	1.80	ACH
	Call with opposing counsel and drafting follow-up written correspondence.	1.30	ACH
May-12-15	Correspondence with opposing counsel.	1.80	ACH
May-13-15	Reviewing and editing draft discovery responses; conference with Silver re same.	2.60	HAZ
	Call with co-counsel re: search terms.	2.10	ACH
	Meet with A. Silver re: RFA responses and work on same.	0.50	ACH
	Begin drafting interrogatory and RFA responses	1.60	AJS
	Discuss discovery responses w/ K. Simplicio	0.30	AJS
	Discuss RFA responses w/ A. Haac	0.10	AJS
	Draft interrogatory responses	0.80	AJS
	Draft RFP responses	1.10	AJS
	Draft RFA responses	0.90	AJS
	Edit/format discovery responses	0.90	ABB
	Create Excel spreadsheet of electronic search terms	0.90	ABB
May-14-15	Reivewing and drafting responses to RFAs.	0.60	ACH
	Correspondence re: search terms.	0.30	ACH

	Finish drafting RFA responses	1.30	AJS
	Finalize draft RFP and RFA responses	0.70	AJS
	Edit discovery responses	1.90	ABB
	Break out Search 66 terms for A. Haac	0.50	ABB
May-15-15	Correspondence with opposing counsel, reviewing search term hits.	0.40	ACH
	Revise draft letter brief RE discovery	0.40	AJS
May-18-15	Finish revising draft letter brief	1.30	AJS
	Research for additional 9th Circuit Noerr Pennington authority	0.60	AJS
May-19-15	Download Plaintiff's document production	0.40	ABB
May-20-15	External correspondence.	0.40	ACH
	Reviewing search terms, correspondence with opposing counsel re: same.	0.70	ACH
May-22-15	Correspondence with opposing counsel.	0.50	ACH
	Break out search terms	0.20	ABB
May-29-15	Correspondence with opposing counsel.	0.10	ACH
Jun-11-15	Reviewing search hits and internal correspondence.	0.20	ACH
Jun-12-15	Reviewing search term results, correspondence with opposing counsel re: same.	0.70	ACH
Jun-18-15	Team meeting to discuss sanctions threat.	0.60	HAZ
	Internal meeting re: SNA sanctions letter.	0.60	ACH
Jun-23-15	Draft retention letter for R. Mailer	0.20	AJS
Jun-25-15	External correspondence.	0.80	ACH

Jun-26-15	External correspondence.	0.30	ACH
Jun-29-15	Conference call re: Tier 2 search proposal.	1.00	ACH
	Drafting revised search terms, correspondence with opposing counsel.	1.00	ACH
	T/c RE discovery w/ A. Haac and K. Simplicio	0.50	AJS
	Edit discovery responses	0.30	ABB
Jun-30-15	Reviewing search terms and drafting email re: proposed tier 2 searches.	0.60	ACH
Jul-06-15	Reviewing correspondence from SNA.	0.20	ACH
Jul-07-15	Reviewing and editing Rule 11 response and errata.	0.90	ACH
	File Discovery Materials from Defendant	0.30	SMT
	Make A. Haac corrections to Repsonse to RFAs	0.10	SMT
Jul-08-15	Review response to letter RE potential sanctions	0.10	AJS
	Search files for information RE testing	0.10	AJS
	Discuss testing documents w/ A. Haac	0.10	AJS
	Make A. Haac edits to RFA draft	0.80	SMT
Jul-13-15	Internal and external correspondence re: discovery, reviewing search term results.	0.90	ACH
Jul-14-15	Call with opposing counsel and preparation re: same.	1.10	ACH
Jul-16-15	Correspondence with opposing counsel.	0.30	ACH
	Discuss documents production w/ J. Kaliel and A. Haac	0.20	AJS
Jul-20-15	T/c w/ co-counsel RE discovery	0.30	AJS

	Upload Defendant's Production	0.60	SMT
Jul-27-15	Correspondence with opposing counsel, reviewing search term hits	0.70	ACH
Jul-29-15	Reviewing spreadsheet cataloging olive oil preserved by T&Z, internal and external correspondence re: same.	0.50	ACH
	T/c w/ K. Simplicio RE discovery and case status	0.30	AJS
	Research Salov SPA presence in U.S.	0.10	AJS
	Send Salov documents to T. Kennedy at Gutride	0.30	SMT
Jul-30-15	Correspondence with opposing counsel.	0.20	ACH
	Team conference call.	0.40	ACH
	Create SendThisFile for Documents Sent to Co-Counsel	0.20	SMT
Aug-04-15	Download SNA docs	0.30	SMT
Aug-12-15	Document Review Project	8.00	MB
Aug-13-15	Document Review Project	8.00	MB
Aug-14-15	Document Review Project	8.00	MB
Aug-17-15	Internal correspondence re: discovery.	0.60	ACH
	Research Salov SPA location in US	1.40	AJS
	Review A. Haac email RE discovery; email co-counsel RE Salov SPA research	0.20	AJS
	Document Review Project	8.00	MB
Aug-18-15	Document Review Project	8.00	MB
	File maintenance re Salov Production	0.60	SMT

Aug-19-15	Correspondence with opposing counsel and co-counsel re: discovery.	1.00	ACH
	Email A. Haac RE subpoena to Salov SPA	0.10	AJS
	Document Review Project	8.00	MB
Aug-20-15	Document Review Project	8.00	MB
Aug-21-15	Meet with M. Brody re: discovery review, correspondence with opposing counsel.	0.90	ACH
	Document Review Project	8.00	MB
	Prepare Amended Discovery Responses Template	0.60	SMT
Aug-24-15	Document Review Project	8.00	MB
	File maintenance and calendaring Depositions	0.40	SMT
Aug-25-15	Research for exemplars of Hague requests	2.00	AJS
Aug-26-15	Draft Hague letter of request and associated documents RE Salov SPA	2.40	AJS
	Discuss Hague letter of request, and discovery, w/ A. Haac	0.30	AJS
	Begin drafting subpoena to and researching corporate information for EVOO manufacturers	1.10	AJS
Aug-28-15	Document Review Project	8.00	MB
Sep-01-15	Upload latest production	0.30	SMT
Sep-02-15	Office conference with Silver regarding document review.	0.10	HAZ
	Discuss document review w/ H. Zavareei and J. Kaliel	0.10	AJS
Sep-03-15	Call with co-counsel re: discovery.	0.70	ACH
	T/c w/ K. Simplicio RE discovery	0.40	AJS

	Discuss discovery w/ A. Haac	0.30	AJS
	Draft letter to opposing counsel RE discovery; email A. Haac RE same	2.90	AJS
	Document Review Project	8.00	MB
	Document Review Project	8.00	MB
	Organize document productions	0.20	SMT
Sep-04-15	Reviewing discovery letter and internal correspondence re: same.	1.00	ACH
Sep-08-15	Reviewing extension letter.	0.30	ACH
	Finalize draft letter to opposing counsel RE discovery schedule	0.10	AJS
	Finalize Meet and Confer letter	0.70	SMT
Sep-11-15	Reviewing correspondence from opposing counsel re: extension.	0.20	ACH
	Review ltr. from opposing counsel RE scheduling	0.10	AJS
Sep-14-15	Internal and external correspondence re: motion for extension.	1.90	ACH
	Discuss discovery and scheduling w/ A. Haac	0.10	AJS
	Draft second set of interrogatories	0.60	AJS
	T/c w/ opposing counsel RE schedule; discuss same w/ A. Haac and K. Simplicio	0.70	AJS
	Email K. Simplicio RE second set of interrogatories	0.10	AJS
Sep-15-15	Correspondence with opposing counsel and co-counsel re: discovery extension.	1.10	ACH
	T/c w/ opposing counsel RE scheduling; discuss same w/ A. Haac and K. Simplicio	0.50	AJS
	Draft response to letter RE scheduling	0.30	AJS

Sep-17-15	Correspondence with opposing counsel.	0.10	ACH
	Review research regarding manufacturers, and email K. Simplicio RE same	0.50	AJS
	T/c w/ K. Simplicio RE manufacturer subpoenas	0.10	AJS
	Finalize manufacturer subpoenas	0.90	AJS
Sep-18-15	Email D. Lawler RE document review	0.10	AJS
	Discuss retailer subpoenas w/ S. Teng	0.10	AJS
Sep-21-15	Drafting discovery letter.	2.50	ACH
	Finalize distributor subpoenas	0.20	AJS
	Preparing distributor subpoenas	0.90	SMT
Sep-22-15	Revise Attachment B to Borges subpoena	0.20	AJS
	Finalize manufacturer subpoenas	0.30	AJS
	Preparing distributor subpoenas	0.60	SMT
	Process distributor subpoenas	0.10	SMT
Sep-23-15	Internal correspondence re: discovery.	0.30	ACH
	Preparing Plaintiff's production	0.20	SMT
Sep-24-15	Meeting with Silver and Haac re discovery.	1.30	HAZ
	Internal correspondence.	0.10	ACH
	Team meeting.	1.30	ACH
	Continue working on Hague letter	3.40	AJS
	Select document requests to append to Hague letter	0.90	AJS
	Select matters for testimony to append to Hague letter	1.30	AJS

	Email A. Haac, H. Zavareei and J. Kaliel RE draft letter of request	0.10	AJS
	Research "competent authority" for Hague request	0.20	AJS
	Discuss potential "competent authority" research w/ S. Goren	0.00	AJS
	Email co-counsel RE Hague request	0.10	AJS
	T/c w/ D. Lawler RE document review	0.40	AJS
	Review current status of document review	0.20	AJS
	Research for motion for issuance of Hague letter	0.90	AJS
	T/c w/ co-counsel RE discovery	1.20	AJS
	Meet w/ A. Haac and H. Zavareei RE discovery	1.30	AJS
	Meeting with A. Silver.	0.10	SJG
	Preparing meet and confer letter	0.30	SMT
Sep-25-15	Meet with Haac and Silver re discovery issues.	1.20	HAZ
Sep-26-15	Supervising document review; QC; reviewing hot docs	1.40	HAZ
	Internal correspondence re: depositions.	1.50	ACH
	Email A. Haac, H. Zavareei and J. Kaliel RE document review	0.10	AJS
	Email D. Lawler RE document review	0.10	AJS
Sep-27-15	Draft legal standard for Hague request; email A. Gutride RE same	2.00	AJS
Sep-28-15	Meeting with Silver re depositions.	0.20	ACH

	Review Salov interrogatory responses and previous correspondence	1.30	AJS
	Search document production for potential deponents	0.60	AJS
	Discuss 30(b)(6) deposition notices w/ S. Teng	0.10	AJS
	Review and finalize draft deposition notices; email co-counsel RE same	1.00	AJS
	Discuss meet-and-confer RE discovery w/ A. Haac	0.20	AJS
	Discuss deposition schedule w/ A. Haac	0.20	AJS
	Email D. Lawler RE document review	0.10	AJS
	Email K. Simplicio RE deposition notices	0.10	AJS
	Discuss depositions w/ J. Kaliel	0.20	AJS
	Email J. Kaliel RE depositions	0.10	AJS
	Review documents to respond to A. Gutride questions RE document custodians; email A. Gutride RE same	0.60	AJS
	Conference with Silver re depositions.	0.20	JK
	Notices of Depo	1.70	SMT
Sep-29-15	Conference with Silver and Haac regarding schedule.	0.40	HAZ
	Drafting M&C and reviewing correspondence for joint motion for extension, correspondence with co-counsel re: same.	7.10	ACH
	Discuss depositions w/ J. Kaliel	0.10	AJS
	Email co-counsel RE depositions	0.10	AJS
	Discuss order RE schedule w/ H. Zavareei and A. Haac	0.40	AJS

	Finalize dates and notices for defendant employee depositions	3.00	AJS
	Preparing Depo Notices	1.10	SMT
Sep-30-15	Reviewing production, drafting M&C letter.	6.20	ACH
	File maintenance re Judge's Order Denying Joint Stipulation for Extension of Time	0.10	SMT
	Send old production to K. Simplicio	0.20	SMT
Oct-01-15	Internal and external correspondence.	0.70	ACH
	Salov subpoenas	0.40	SMT
Oct-02-15	External correspondence.	0.20	ACH
Oct-05-15	Meeting re: discovery, second-level document review.	3.90	ACH
	Discuss depositions and manufacturer subpoenas w/ S. Teng	0.10	AJS
	Discuss discovery and depositions w/ A. Haac	0.30	AJS
	Review A. Haac draft letter RE discovery; email A. Haac RE same	0.70	AJS
	Email D. Lawler RE document review	0.10	AJS
	Conduct second-level review on tagged documents	4.10	AJS
	T/c w/ D. Lawler RE document review; discuss same w/ A. Haac	0.30	AJS
	Subpoena Borges issue	0.40	SMT
Oct-06-15	Internal correspondence re: discovery and second-level document review for same.	2.70	ACH
	Edit meet and confer letter.	2.30	ACH
	Revise meet-and-confer letter to co-counsel RE missing documents	1.30	AJS

	Review correspondence and deposition notices in preparation for meet-and-confer call	0.30	AJS
	T/c w/ K. Simplicio RE deposition dates	0.10	AJS
	T/c w/ opposing counsel RE discovery and depositions	0.80	AJS
	Discuss discovery and depositions w/ A. Haac	0.10	AJS
	Discuss discovery and depositions w/ J. Kaliel	0.10	AJS
	Email K. Simplicio RE depositions	0.10	AJS
	Download latest production	0.30	SMT
	Depo Bookings	0.40	SMT
Oct-07-15	Contact attorneys for distributors RE subpoenas	0.50	AJS
	T/c w/ S. Steinberg RE Botticelli subpoena	0.10	AJS
	Send ltr re discovery	0.50	SMT
Oct-08-15	Review deposition notices; email opposing counsel RE deposition schedule	0.20	AJS
Oct-09-15	Email K. Simplicio RE defendant depositions	0.10	AJS
	Email opposing counsel RE defendant depositions	0.40	AJS
	Email A. Haac and K. Simplicio RE discovery letter to opposing counsel	0.10	AJS
Oct-12-15	Email K. Simplicio RE Hague letter of request	0.10	AJS
Oct-13-15	Discussing discovery and depositions with Silver.	0.30	HAZ
	Meet with A. Silver re: depositions.	0.90	ACH
	Reviewing draft Hague request and discovery letter, editing declaration.	3.60	ACH

	Correspondence.	0.50	ACH
	Email S. Goren RE Hague letter; discuss same w/ S. Goren	0.30	AJS
	Call M. Kelly RE ACH Food subpoena	0.10	AJS
	Discuss depositions w/ A. Haac	0.90	AJS
	Email co-counsel RE deposition plans	0.20	AJS
	Discuss discovery and depositions w/ H. Zavareei	0.30	AJS
	Email co-counsel w/ update on distributor subpoenas	0.10	AJS
	Begin reviewing documents in preparation for 30(b)(6) and Mueller depositions	2.80	AJS
	Email A. Haac RE native file documents review	0.10	AJS
	Preparing draft of A. Haac Decl	1.40	SMT
	Calendaring re depo notices	0.30	SMT
Oct-14-15	Research production of NCL documents; email J. Kaliel RE same	0.40	AJS
	Review and revise A. Haac declaration	0.40	AJS
	T/c w/ M. Kelly RE subpoena to ACH Foods	0.10	AJS
	Email J. Kaliel and A. Haac RE depositions	0.10	AJS
	T/c w/ K. Simplicio RE discovery	0.20	AJS
	A. Haac Declaration	3.90	SMT
Oct-15-15	T/c w/ K. Simplicio RE newly received documents	0.10	AJS
	Email S. Teng RE deposition notices and documents for depositions	0.10	AJS

	A. Haac Declaration edits	2.90	SMT
	Preparing deposition Notices	2.20	SMT
Oct-16-15	Reviewing documents and preparing for depositions	1.50	ACH
	Continue reviewing documents in preparation for depositions	3.70	AJS
	Email opposing counsel RE amended deposition notices	0.10	AJS
	Begin drafting deposition outline for Mueller/30b6	3.40	AJS
	Download latest production	0.30	SMT
	Preparing exhibits for deposition	5.50	SMT
	Edits to A. Haac declaration	1.20	SMT
	Book depositions	0.20	SMT
Oct-17-15	Continue reviewing documents and outlining for 30(b)(6) and T. Mueller deposition	6.00	AJS
Oct-18-15	Continue reviewing documents and outlining for 30(b)(6) and T. Mueller deposition	4.00	AJS
Oct-19-15	Email S. Teng RE documents for deposition	0.10	AJS
	Continue reviewing documents and adding to outline for upcoming depositions	4.60	AJS
	Conference call w/ co-counsel RE upcoming depositions	0.50	AJS
	Depo prep	1.60	SMT
	Preparing EVOO docs for J. Kaliel review	1.70	SMT
Oct-20-15	Finish drafting and adding exhibits to outline for 30(b)(6) and Mueller depositions	2.40	AJS
	Travel from DC to Newark for upcoming depositions	3.60	AJS

	Prepare documents and finalize outline for depositions	4.00	AJS
	Travel from DC to Newark for upcoming depositions	3.60	JK
	Prepare documents and finalize outline for depositions	2.00	JK
	File maintenance re subpoenas	0.20	SMT
	Compile pro hac vice application for A. Silver	0.70	SMT
Oct-21-15	Email M. Kelly RE ACH Food subpoena	0.10	AJS
	Second-chairing first day of T. Mueller/SNA deposition	9.30	AJS
	Revise outline and prepare documents for second day of T. Mueller/SNA deposition	2.00	AJS
	Taking T. Mueller/SNA deposition	9.30	JK
	Revise outline and prepare documents for second day of T. Mueller/SNA deposition	1.00	JK
Oct-22-15	Meet w/ J. Kaliel prior to T. Mueller deposition	0.50	AJS
	Second chair second day of T. Mueller deposition	8.70	AJS
	Return to Washington, DC from Newark	3.50	AJS
	Review documents provided by Mazola; email co-counsel RE same	0.20	AJS
	Email K. Simplicio RE Mueller deposition	0.10	AJS
	Email R. Ryan RE Borges subpoena	0.10	AJS
	Email S. Rivera RE subpoena to Pompeian	0.10	AJS
	Meet w/ A. Silver prior to T. Mueller deposition	0.50	JK

	Take second day of T. Mueller deposition Arbitration sessions	7.70	JK
	Return to Washington, DC from Newark	3.50	JK
	Call with R. Ryan office re Borges Subpoena	0.10	SMT
Oct-23-15	Depo Preparation Rohini Kumar	0.10	SMT
	Speak with Capital Reporting	0.10	SMT
Oct-26-15	Begin reviewing documents for Scheiber deposition	2.00	AJS
	Upload distributor production	0.30	SMT
Oct-27-15	Review email from opposing counsel RE document production; email co-counsel RE same	0.20	AJS
	Finish reviewing documents in preparation for Scheiber deposition	3.80	AJS
	Discuss document production and depositions w/ K. Simplicio	0.30	AJS
	Discuss depositions w/ J. Kaliel	0.10	AJS
	Begin reviewing documents for Mosca deposition	1.00	AJS
	Download latest production	0.20	SMT
Oct-28-15	Reviewing subpoena.	0.20	ACH
	Continue reviewing documents in preparation for M. Mosca deposition	0.80	AJS
	Review defendant's recent document production	2.40	AJS
	Review documents in preparation for A. Rodda deposition	1.90	AJS
	Email S. Teng RE pro hac vice admission	0.10	AJS
	Depo prep	3.60	SMT

	File A. Silver PHV	0.90	SMT
Oct-29-15	Finish reviewing Rodda documents	2.30	AJS
	Email K. Simplicio RE privilege redactions in defendant's document production	0.10	AJS
	Draft outline for D. Scheiber deposition	3.60	AJS
	Depo prep	1.20	SMT
Oct-30-15	Correspondence with co-counsel.	0.30	ACH
	Revise D. Scheiber deposition outline	1.00	AJS
	Draft A. Rodda deposition outline	4.00	AJS
	Email A. Milleman RE CA Olive Ranch/Lucini subpoena	0.10	AJS
	Email A. Gutride RE EVOO evidence	0.10	AJS
Oct-31-15	Draft M. Rodda deposition outline	4.00	AJS
Nov-02-15	Internal and external correspondence re: subpoena.	0.60	ACH
	Revise and finalize D. Scheiber deposition outline	0.80	AJS
	Annotate Mailer declaration w/ Mueller testimony and exhibits; email A. Gutride RE same	1.50	AJS
	Prepare documents for Scheiber, Rodda, and Mosca depositions	0.40	AJS
	Email K. Simplicio RE class certification	0.10	AJS
	Review outlines and prepare documents for Rodda and Mosca depositions	1.00	AJS
	Travel from Washington DC to West Orange, NJ (travel delays)	4.70	AJS

	Review outlines and prepare documents for Rodda and Mosca depositions	0.70	JK
	Travel from Washington DC to West Orange, NJ	3.70	JK
	Preparing deposition exhibits.	0.90	SMT
Nov-03-15	Correspondence re: subpoena and outstanding items.	1.00	ACH
	Review outline and prepare documents for D. Scheiber deposition	0.50	AJS
	Second chair D. Scheiber deposition	8.50	AJS
	Review outlines for A. Rodda and M. Mosca deposition	1.00	AJS
	Email S. Teng RE Filippo Berio website screenshots	0.10	AJS
	Review outline and prepare documents for D. Scheiber deposition	0.30	JK
	Take D. Scheiber deposition	8.50	JK
	Return travel from Roseland, NJ to Washington DC	4.00	JK
Nov-04-15	Review outlines and prepare for A. Rodda and M. Mosca depositions	1.00	AJS
	Take A. Rodda and M. Mosca depositions	6.40	AJS
	Return travel from Roseland, NJ to Washington DC	4.00	AJS
Nov-05-15	Discussing depositions with Silver.	0.10	HAZ
	Discuss recent depositions w/ H. Zavareei	0.10	AJS
	Email co-counsel RE EVOO claims	0.10	AJS

	Email co-counsel RE olive oil bottles in TZ possession	0.10	AJS
	Emails with Veritext re invoices	0.30	SMT
Nov-06-15	Internal correspondence re: subpoena.	1.10	ACH
	Email K. Simplicio RE second set of requests for production	0.10	AJS
	Conference call w/ co-counsel RE subpoenas and class certification	0.80	AJS
	Draft response to subpoena	1.20	SMT
Nov-09-15	Reviewing declaration.	0.20	ACH
	Review documents requested by C. Weir; email K. Simplicio RE same	0.10	AJS
Nov-10-15	Reviewing subpoena and declaration, call with co-counsel, call with opposing counsel, meet with S. Teng.	2.30	ACH
	Email co-counsel RE SNA stay proposal	0.10	AJS
	Gather documents identified by C. Weir for expert report	1.10	AJS
	Discuss subpoena response w/ A. Haac and H. Zavareei	0.30	AJS
	T/c w/ K. Simplicio RE class certification	0.30	AJS
	Email H. Zavareei RE class certification	0.20	AJS
	Review T. Mueller deposition transcript in preparation for class certification brief	1.70	AJS
	Discuss class certification w/ S. Teng	0.10	AJS
	Prepare producer files to send to opposing counsel	0.40	SMT
	Meeting with A. Haac re Declaration	0.90	SMT
	Review plaintiff's productions	2.40	SMT

	Preparing and organizing depo exhibits	0.20	SMT
	Edits to A. Haac Filippo Berio bottle	1.20	SMT
Nov-11-15	Email A. Gutride RE information to provide to R. Mailer	0.50	AJS
	Email A. Haac RE electronic service	0.10	AJS
Nov-12-15	Researching subpoenas.	0.80	ACH
	Finish gathering documents and testimony to provide to C. Weir	0.90	AJS
	Draft email to opposing counsel RE supplementing interrogatory response RE sales figures	0.70	AJS
	Gather documents and testimony for R. Mailer declaration	2.50	AJS
	Organizing Depo Transcripts and Exhibits	0.30	SMT
	Reviewing confidentiality designations	0.10	SMT
	Search A. Berkowitz email for Mostofi bottles info	0.40	SMT
	More edits to A. Haac declaration	1.30	SMT
Nov-16-15	Begin drafting class certification motion	3.00	AJS
Nov-17-15	Meeting with Silver re stay motion.	0.10	HAZ
	Discuss opposition to motion to stay w/ H. Zavareei	0.10	AJS
Dec-01-15	Email K. Simplicio RE opp. to mot. to stay	0.10	AJS
	Review order RE: mot. to stay	0.10	AJS
Dec-03-15	Begin drafting opp. to mot. to stay	4.90	AJS
	Discuss opp. to mot. to stay w/ K. Simplicio	0.20	AJS
Dec-07-15	Finish draft of opp. to mot. to stay	2.80	AJS

	Email K. Simplicio RE opp. to mot. to stay	0.10	AJS
Dec-09-15	Review Law360 article RE Whole Foods stay; email H. Zavareei RE same	0.10	AJS
	Review Mueller deposition transcript; email K. Simplicio RE same	0.30	AJS
	Review opp. to mot. to stay; email K. Simplicio RE same	0.80	AJS
Dec-14-15	Change of Address filing	0.10	SMT
Dec-15-15	Calendaring	0.20	SMT
Dec-18-15	Conference call w/ co-counsel RE subpoenas and class certification	1.50	AJS
	Research for mot. for class certification	1.00	AJS
Dec-29-15	Continue researching for mot. for class certification	1.00	AJS
Dec-31-15	Email A. Gutride RE class certification	0.60	AJS
	Revise and send email to opposing counsel RE supplementing interrogatory responses	0.20	AJS
Jan-04-16	Research factors not affecting price premium	1.60	AJS
Jan-05-16	Continue drafting class certification motion	5.10	AJS
	Conference call w/ co-counsel RE discovery and class certification	0.80	AJS
Jan-06-16	Continue drafting class certification motion	4.90	AJS
Jan-07-16	Continue drafting class certification brief	3.70	AJS
Jan-08-16	Revise draft class cert. motion	0.60	AJS
Jan-11-16	Email H. Zavareei and J. Kaliel RE discovery	0.10	AJS
	T/c w/ C. Weir RE expert report	0.10	AJS
	Email C. Weir RE expert report	0.10	AJS

Jan-12-16	Review Salov document production; email co-counsel RE same	0.40	AJS
	Research catalyst theory	1.20	AJS
	Revise class certification brief; email K. Simplicio RE same	2.40	AJS
	Discuss class certification w/ S. Teng	0.10	AJS
	Download production	0.50	SMT
	Chat with A. Silver re class cert logistics	0.10	SMT
Jan-13-16	T/c w/ K. Simplicio RE class certification	0.40	AJS
	Discuss class certificaion w/ S. Teng	0.20	AJS
	Call re Class Certification brief with A. Silver and K. Simplicio	0.40	SMT
Jan-14-16	Preparing deposition errata	0.10	SMT
	class cert transcript exhibits	0.20	SMT
Jan-15-16	Begin drafting class certification supporting documents, and coordinate w/ S. Teng RE class certification exhibits	3.00	AJS
	Discuss third-party discovery compliation w/ S. Teng; email C. Weir RE same	0.20	AJS
	Email opposing counsel RE third-party document production	0.10	AJS
	Email co-counsel RE class certification biref status	0.20	AJS
	Class certification exhibits	3.00	SMT
Jan-18-16	Editing and revising class certification brief.	6.30	HAZ
	Revise and finalize class certification brief and supporting materials	7.00	AJS
Jan-19-16	Drafting and editing HAZ declaration.	2.10	HAZ

	Revise, redact, and finalize class certification motion and supporting documents	6.50	AJS
	Preparing draft of HAZ Declaration	2.60	SMT
	Proof-read draft brief	1.90	SMT
	Edits to Class Brief	0.70	SMT
	Tables to Class Brief	1.50	SMT
Jan-20-16	Filing class cert under seal	0.40	SMT
Feb-05-16	Email co-counsel RE RFA responses	0.10	AJS
Feb-11-16	Email H. Zavareei and J. Kaliel RE email service	0.10	AJS
	Draft letter of request RE Salov S.p.A.	2.00	AJS
Feb-12-16	Finalize draft letter of request RE Salov S.p.A.	0.50	AJS
Feb-16-16	Revise Hague letter of request	3.00	AJS
Feb-17-16	Begin drafting motion for issuance of letter of request	2.00	AJS
Feb-18-16	Continue drafting motion for issuance of letter of request	1.00	AJS
	Preparing Weir Production	0.20	SMT
Feb-19-16	Email opposing counsel RE letter of request	0.20	AJS
	Continue drafting mot. for letter of request	1.00	AJS
Feb-22-16	Draft motion for issuance of letter of request and supporting documents; revise proposed letter of request	8.20	AJS
	Email re Weir Subpoena response	0.10	SMT
Feb-23-16	Revise and finalize mot. for issuance of letter of request	5.50	AJS

	T/c w/ K. Simplicio RE mot. for issuance of letter of request	0.20	AJS
	pull exhibits and phone call with A. Abate re motion to seal	0.60	SMT
Feb-24-16	Draft mot. to seal and supporting documents	3.00	AJS
	Mot for LOR/accompanying Mot to Seal	3.40	SMT
	Finalize and file Mot for LOR and Mot to Seal	1.50	SMT
	File maintenance re LOR and Mot to Seal; also email proposed orders	0.50	SMT
Feb-25-16	Meet with A. Silver and H. Zavareei re open tasks.	0.10	ACH
Mar-09-16	Review Salov opp. to mot. for letter of request	0.50	AJS
Mar-10-16	Meet with J. Kaliel, A. Silver, and H. Zavareei.	0.20	ACH
	Draft reply ISO mot. for letter of request	3.40	AJS
	Research for reply ISO mot. for letter of request	3.30	AJS
	Meeting re open tasks.	0.20	JK
Mar-11-16	Finalize draft reply ISO motion for issuance of letter of request; email K. Simplicio RE same	0.90	AJS
Mar-16-16	Reviewing and editing reply brief in support of letters rogatory; reviewing class certification opposition; research regarding cases cited in same.	5.90	HAZ
	Reviewing opposition to class certification; meeting with Silver re same.	1.70	HAZ
	Email K. Simplicio and A. Gutride RE Hauge letter of request	0.20	AJS
	Discuss opp. to class cert. w/ H. Zavareei	0.10	AJS
	Review opp. to class cert.; email co-counsel RE same	1.70	AJS

	Revise and finalize reply ISO letter of request	3.40	AJS
	Preparing tables and cites for reply Brief ISO LOR	2.60	SMT
Mar-21-16	Conference with Silver re case strategy.	0.10	HAZ
	Discuss case status w/ H. Zavareei	0.10	AJS
	Review MacDonald v. Ford decision; email H. Zavareei RE same	0.10	AJS
Mar-22-16	Review class certification briefing and supporting documents	2.20	AJS
	T/c w/ co-counsel RE case status	0.60	AJS
	Research 9th Cir. ascertainability cases; email H. Zavareei RE same	0.20	AJS
Mar-25-16	Meet with A. Silver re case management.	0.10	ACH
Mar-27-16	Review order RE letter of request; email co-counsel RE same	0.20	AJS
Mar-31-16	Conference call re case management with co-counsel.	0.40	ACH
Apr-05-16	T/c w/ K. Simplicio	0.10	AJS
Apr-07-16	Review Ugone declaration	2.20	AJS
Apr-08-16	Draft notes on Ugone declaration	1.70	AJS
Apr-10-16	Finish notes on Ugone declaration	3.00	AJS
Apr-11-16	Revise proposed letter of request, pursuant to order	2.40	AJS
Apr-19-16	Begin researching for reply ISO mot. for class certification	1.20	AJS
Apr-20-16	Email H. Zavareei RE class certification	0.20	AJS
Apr-21-16	Continue researching for reply ISO class cert.	0.80	AJS

	Revise letter of request	0.60	AJS
Apr-25-16	Draft reliance and materiality section of reply ISO class cert.	5.80	AJS
	Review Mueller declaration	0.70	AJS
	Begin drafting section on class member exposure of reply ISO class cert.	0.20	AJS
	Research amending class definition	1.00	AJS
Apr-26-16	Drafting and editing reply in support of class certification.	3.90	HAZ
	Finish drafting section on class member exposure to challenged representation for reply ISO class cert.	2.70	AJS
	Research ascertainability	1.00	AJS
	Draft response to Salov ascertainability argument	1.40	AJS
Apr-27-16	Email opposing counsel RE proposed letter of request	0.20	AJS
	Research damages issues for reply ISO mot. for class certification	2.00	AJS
	Email A. Gutride RE class certification brief	0.10	AJS
Apr-28-16	Research for superiority section of reply ISO class cert.	1.00	AJS
May-02-16	Finish draft reply ISO class certification	2.70	AJS
	Revise proposed letter of request	2.50	AJS
May-04-16	Review documents for brand loyalty references	1.80	AJS
May-06-16	Research for answer to CBP arguments RE reply ISO class cert.	1.40	AJS
	Factual research for reply ISO class cert.	1.10	AJS

May-09-16	Work on supporting documents for reply ISO class cert., and finalize same	5.50	AJS
May-10-16	Finalize class certification reply and supporting documents, and redact same	5.50	AJS
May-24-16	Emails with Gutride re hearing; drafting supplemental declaration.	3.40	HAZ
Jul-06-16	Review orders RE sealed documents; email K. Simplicio and N. Laporte RE same	0.10	AJS
Jul-08-16	Meeting re testing documents.	0.10	ACH
Jul-11-16	Work on documents needed to re-file reply ISO class certification	2.00	AJS
	Prepare documents with amended redactions per court order.	3.50	NRL
Jul-12-16	Finalize re-filing of reply ISO class certification	2.00	AJS
	Compile amended versions of redacted documents for filing per court order.	4.00	NRL
Jul-15-16	Review class certification order	0.60	AJS
Jul-16-16	Meeting re documents production.	0.20	ACH
	Discussion with A. Haac and A. Silver.	0.20	JK
Jul-30-16	Call with Salov team.	0.40	HAZ
	Conference call with A. Haac and H. Zavareei.	0.40	AJS
Aug-08-16	T/C with Simplicio and Gutride regarding settlement and notice issues.	0.70	HAZ
	Conference call w/ co-counsel	0.30	AJS
Aug-10-16	Draft portions of CMC	0.80	AJS
	Finish revising CMC statement	1.00	AJS
Aug-11-16	Editing and revising settlement term sheet.	1.30	HAZ

	Review draft term sheet; revise and edit same; email H. Zavareei RE same	0.70	AJS
	Email A. Gutride RE Salov CMC	0.10	AJS
Aug-12-16	Reviewing settlement agreement, internal correspondence re: same.	0.30	ACH
Aug-26-16	Discussion with A. Silver.	0.30	ACH
Aug-28-16	Working with Cam Azari on potential notice solutions.	1.40	HAZ
Sep-02-16	Meeting with H. Zavareei and A. Silver re review of production.	0.10	JK
Sep-06-16	Reviewing settlement proposals; emails with co-counsel regarding same.	2.10	HAZ
Sep-25-16	Meeting regarding discovery.	1.20	ACH
	Discuss discovery issues with A. Haac and H. Zavareei.	1.20	AJS
Sep-28-16	Meet with A. Silver re m&c.	0.20	ACH
Sep-29-16	Deposition discussion with A. Silver.	0.10	JK
Oct-06-16	Meet re Discovery and Depos.	0.10	JK
Oct-26-16	Internal and external correspondence re: settlement, review and drafting for mediation brief.	5.60	ACH
	Discuss mediation w/ A. Haac	0.30	AJS
	Review email discussions RE settlement	0.20	AJS
	T/c w/ co-counsel RE mediation	0.50	AJS
	Research for mediation statement; email A. Haac RE same	0.20	AJS
Oct-27-16	Drafting mediation statement.	3.20	ACH
	VM with opposing counsel.	0.10	ACH

	Discuss mediation statement w/ A. Haac; draft additions to mediation statement, and research for mediation statement	1.00	AJS
	Discussion re depositions.	0.10	JK
	Call with S. Teng re motion to seal.	0.40	AEA
Oct-28-16	Call with Gutride/Safier regarding upcoming mediation.	0.30	HAZ
	Drafting mediation statement.	4.50	ACH
	Draft inserts for mediation statement	3.00	AJS
	Review draft of mediation statement	1.00	AJS
	A. Haac Pro Hac Vice application.	0.70	NRL
	Create letter template.	0.20	NRL
Oct-31-16	Editing draft mediation statement.	6.90	HAZ
	Drafting mediation statement.	3.80	ACH
	Respond to emails from A. Haac RE mediation statement; email A. Haac RE draft of mediation statement	0.30	AJS
Nov-01-16	format exhibits for mediation.	0.20	NRL
Nov-02-16	Internal and external correspondence re: mediation.	0.90	ACH
	Finalizing mediation letter, revising exhibits, internal and external correspondence re: same.	1.20	ACH
Nov-04-16	Internal correspondence re: mediation.	0.20	ACH
	Discuss mediation w/ A. Haac	0.20	AJS
	Revise case documents and mediation statement in preparation for mediation	0.50	AJS
Nov-05-16	Reviewing status report.	0.10	ACH

Nov-07-16	Travel to California for mediation.	7.00	ACH
	Meeting re: mediation.	1.00	ACH
	Travel from Washington, DC to Oakland, CA for mediation	8.50	AJS
Nov-08-16	Mediation.	11.00	ACH
	Meet w/ A. Gutride and S. Safier prior to mediation	0.50	AJS
	Attend mediation	10.50	AJS
	Email H. Zavareei RE mediation conclusion	0.10	AJS
Nov-09-16	Travel from California.	8.00	ACH
	Return travel from San Francisco, CA to Washington, DC	8.50	AJS
Nov-10-16	Meet with A. Silver re mediation.	0.40	HAZ
	Discuss mediation w/ H. Zavareei	0.40	AJS
Nov-14-16	Draft pro hac application.	1.20	NRL
Nov-15-16	Mediation meeting with A. Silver.	0.10	ACH
	Discuss mediation w/ A. Haac	0.10	AJS
Nov-16-16	Discuss pro hac vice with N. Laporte.	0.10	ACH
	Conversation with A. Haac re Pro Hac Vice admission fee.	0.10	NRL
Nov-29-16	Internal correspondence re: settlement.	0.10	ACH
Dec-05-16	Internal correspondence.	0.20	ACH
Dec-09-16	Internal correspondence.	0.10	ACH
Dec-12-16	Internal correspondence, drafting preliminary approval motion.	0.20	ACH

Dec-15-16	Reviewing and commenting on settlement agreement; reviewing and editing joint undertaking; emails with Gutride re same; conference with Haac re preliminary approval motion; drafting and editing same.	5.70	HAZ
	Drafting preliminary approval motion.	2.00	ACH
Dec-18-16	Drafting preliminary approval motion.	2.40	ACH
Dec-19-16	Drafting preliminary approval motion and correspondence re: same.	5.70	ACH
Dec-20-16	Editing preliminary approval motion, correspondence re: same.	1.90	ACH
Dec-21-16	Editing motion for preliminary approval.	1.50	ACH
Dec-26-16	Research for and revising preliminary approval motion, drafting declaration in support of same.	10.00	ACH
Dec-27-16	Research for and revising preliminary approval motion, drafting declaration in support of same, and related correspondence with co-counsel.	3.50	ACH
	Drafting joint admin motion, researching same, and related correspondence.	1.00	ACH
Dec-29-16	Preparing and finalizing preliminary approval motion.	2.80	HAZ
	Reviewing opposing counsel edits to preliminary approval motion and revising same.	1.70	ACH
	Finalizing pleadings, internal correspondence re: same.	1.50	ACH
Dec-30-16	Finalizing preliminary approval motion.	3.40	HAZ
	Final review and editing of preliminary approval pleadings, internal correspondence re: same.	3.20	ACH
	Prepare motion and dec.	2.80	NRL

Jan-09-17	Reviewing order, internal and external correspondence.	0.30	ACH
	Reviewing pleadings, revising same per court's instruction.	0.20	ACH
Jan-11-17	Reviewing pleadings per judge's order and related correspondence with co-counsel.	0.50	ACH
	Change dates on drafts of prelim approval materials.	0.70	NRL
Jan-13-17	Reviewing and editing amended preliminary approval motion.	0.40	ACH
Jan-17-17	Correspondence with opposing counsel, drafting cover letter to court, revising proposed order.	1.40	ACH
Jan-18-17	Internal correspondence re: filing.	0.20	ACH
	File amended dates on docket.	0.90	NRL
Jan-19-17	Create binder for A. Haac.	0.80	NRL
Jan-23-17	Travel to San Francisco for preliminary approval hearing.	4.00	ACH
Jan-24-17	Preliminary approval motion hearing and internal meeting re: same.	3.00	ACH
	Travel from CA.	4.00	ACH
	Amend preliminary approval documents.	1.20	NRL
Jan-25-17	Internal and external correspondenc re: hearing and revised order, editing same.	1.70	ACH
	Amend proposed order	0.50	NRL
Jan-26-17	Correspondence with co-counsel.	0.20	ACH
	Revising second amended proposed order and cover letter, reviewing online mock-up, correspondence with opposing counsel re: same.	1.40	ACH
Feb-17-17	Researching settlement agreement.	0.30	ACH

Mar-20-17	Emails regarding claims data.	0.30	HAZ
Mar-28-17	Begin drafting final approval brief	2.50	AJS
Apr-03-17	Continue working on final approval brief	6.70	AJS
Apr-04-17	Editing and revising final approval motion.	4.30	HAZ
	Finish first draft of final approval brief	5.80	AJS
Apr-05-17	Reviewing and preparing time sheets for production; revising declarations; revising draft final approval brief.	6.20	HAZ
	Draft supporting documents for final approval submission	8.30	AJS
	Revise final approval brief	2.00	AJS
	Check time and expenses for FA decs.	0.60	NRL
	Prepare documents for Final Approval filing.	0.80	NRL
Apr-06-17	Revise H. Zavareei declaration	1.00	AJS
	Review letter from TINA.org RE settlement	0.20	AJS
	Research TINA.org	1.00	AJS
	Totals	1003.70	

EXHIBIT B

Tycko & Zavareei LLP
1828 L Street, N.W.
Suite 1000
Washington, DC 20036

Ph: (202) 973-0900 Fax: (202) 973-0950

April 6, 2017

File #: 248-03

RE: Kumar v. Salov North America Corp. and Ital Foods, Inc.

DISBURSEMENTS

	Postage	6.99
Apr-06-15	Court document retrieval from 1st quarter PACER Service	2.00
Apr-17-15	Photocopying 625 @ 0.15	93.75
May-18-15	Conference calls	8.64
May-19-15	Photocopies 164 @ 0.15	24.60
Jun-17-15	Photocopies 33 @ 0.15	4.95
Jul -20-15	Photocopies 2 @ 0.15	0.30
Sep-17-15	Photocopies 21 @ 0.15	3.15
Oct-02-15	Service of process by Capital Process Services invoice 15-128579 on 9/30/15	125.00
Oct-07-15	Court document recovery from Pacer Service 3rd quarter invoice	26.30
Oct-16-15	Conference call on 9/14/15 at 3:30 pm	3.24
Oct-20-15	Service of process to J. M. Smuckers by Capital Process Services invoice 15-128585	75.00
	Service of process to Botticelli Foods by Capital Process Services invoice 15-128582	75.00

Service of process to ACH food Company
Page 1

	es by Capitol Process Services invoice 15-128527	225.00
	Service of process to Colavita USA by Capitol Process Services invoice 15-12 8574	225.00
	Photocopies 5812 @ 0.15	871.80
Oct-21-15	Certificate of good standing for A. Silver	5.00
Oct-31-15	Expert witness fee by Economics & T echnology invoice 201506271	10,500.00
Nov-09-15	Service of process by Capitol Process Services invoice 15-128586	150.00
Nov-13-15	Service of process by Capitol Process S ervices invoice 15-128584	75.00
Nov-18-15	Photocopies 2817 @ 0.15	422.55
Nov-23-15	Curb cab on 10/19/15	7.39
	Curb cab on 10/19/15	14.89
	DC Taxi on 10/19/15	8.74
	Desmond cab on 11/5/15	30.00
	Newark Airport Marriott on 10/5/15	322.25
	The W Hoboken hotel on 11/4/15	191.40
	National car rental on 11/3/15	200.85
	Uber cab on 11/2/15	47.86
	National car tolls on 10/23/15	6.32
	Cab in Newark on 10/23/15	11.22
	Uber cab on 10/20/15	40.94
	United Airlines on 10/16/15	532.10
	Amtrak ticket on 10/23/15	157.00
	DC Taxi on 11/4/15	11.09
	The Grand Wilshire in WestOrange on 11/ 4/15	69.37
	Uber cab on 11/4/15	24.07
	Uber cabs (2) on 11/3/15	62.58
	Uber cab on 11/2/15	16.08
	Hotels.com reservation 12/23/15	348.44
	Uber cab on 11/23/15	7.06
	United Airlines on 10/23/15	178.10
	Uber cabs (2) on 10/22/15	30.03
	Uber cabs (2) on 10/22/15	60.43
	Lyft cab on 10/20/15	12.04
	Uber cab on 10/20/15	12.95
	Amtrak ticket on 10/16/15	188.00
	United Airlines ticket on 10/16/15	228.10

	Federal express delivery on 10/31/15	44.80
	Federal express delivery on 10/19/15	51.23
Dec-07-15	Service of process by Capitol Process Services invoice 15-128587	75.00
Dec-08-15	Attempted service of process by Capitol Process Service invoice 15-128572	75.00
Dec-18-15	Conference call on 11/10/15 at 11:30 am	1.96
	Conference call on 11/10/15 at 10:30 am	0.12
Dec-21-15	Photocopies 28 @ 0.15	4.20
Jan-21-16	Photocopies 116 @ 0.15	17.40
Jan-29-16	Court document retrieval through Pacer 4th quarter 2015 invoice	2.00
Feb-29-16	Conference call on 1/5/16 at 4 pm	9.84
	Photocopies 36 @ 0.15	5.40
Mar-01-16	Expert witness fee by Economics & Technology invoice 201706393	4,050.00
Mar-18-16	Photocopies 105 @ 0.15	15.75
Apr-28-16	Photocopies 247 @ 0.15	37.05
May-31-16	Expert witness services provided by Economics & Technology invoice 201606462	17,405.62
	Photocopies 101 @ 0.15	15.15
Jun-17-16	Court document retrieval through Pacer 1st quarter 2016	8.10
Aug-26-16	Federal Express delivery on 7/18/16	70.81
Sep-30-16	Photocopies 837 @ 0.15	125.55
Oct-10-16	Court document retrieval through Pacer 3rd Quarter invoice	8.70
Oct-31-16	Photocopies 143 @ 0.15	21.45
Nov-22-16	Oakland Marriott hotel in Oakland on 11/9/16	251.42
	Parking at Oakland Convention Center on 11/8/16	39.00
	SWAir baggage fee on 11/7/16	40.00
	SWAir ticket on 10/31/16	224.98
	Uber cab on 11/10/16	35.50
	Oakland Marriott on 11/9/16	275.23
	Uber cab on 11/09/16	15.85

	Uber cabs (2) on 11/7/16	50.92
	AA ticket on 10/28/16 to San Francisco on 11/7/16	493.70
Dec-30-16	Conference call on 10/26/16 at 12:30 pm	3.54
Feb-02-17	Cab to Airport on 1/25/16	40.00
Feb-28-17	Photocopies 347 @ 0.15	52.05
Mar-31-17	Expert witness fee by Economics & Technology invoice 201706666	3,056.25
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	Totals	\$42,366.14