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19 *Attorneys for Plaintiff and the Settlement Class*

20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**
22 **SAN JOSE DIVISION**

23 ARTIE LASHBROOK, on behalf of himself and all
24 others similarly situated,
25
26 Plaintiff,
27
28 vs.
29 CITY OF SAN JOSE,
30
31 Defendant.

CLASS ACTION

Case No.: 20-cv-01236-NC

**DECLARATION OF TIMOTHY P. FOX IN
SUPPORT OF MOTION FOR AN AWARD
OF REASONABLE ATTORNEYS' FEES,
COSTS, AND EXPENSES**

Date: September 2, 2020
Time: 1:00 PM
Dept: Courtroom 5
Before: Hon. Nathanael M. Cousins

1 I, Timothy P. Fox, declare as follows:

2 1. I am a member in good standing of the State Bars of California and Colorado, and Co-
3 Executive Director of the Civil Rights Education and Enforcement Center ("CREEC") in Denver,
4 Colorado. I am an attorney of record for the Plaintiffs in this action. I am familiar with the facts stated
5 below based on my own personal knowledge, and if called upon could and would testify competently
6 about them.

7 2. The hours my co-counsel and I have spent on this case to date were reasonably
8 expended in obtaining an outstanding result for the Class. My co-counsel and I spent time: (1) working
9 closely with Named Plaintiff Lashbrook; (2) analyzing information provided by the City, including the
10 City's curb ramp design standards, policies and procedures, curb ramp database, and request for
11 proposal and scope of services related to the curb ramp survey; (3) researching and drafting
12 correspondence addressing the City's statute of limitations defense; (4) leading and strategizing
13 positions for the negotiations with the City; (5) negotiating the Interim Agreement and Consent
14 Decree; (6) drafting and revising correspondence, pleadings, and settlement documents; (7)
15 communicating with representatives of the City of San Jose; and (8) effectuating the Consent Decree's
16 preliminary approval and notice to the class.

17 3. All attorneys and legal staff at CREEC are instructed to maintain contemporaneous time
18 records reflecting the time spent on this and other matters. This includes contemporaneous recording of
19 the date and amount of time spent on a task to one-tenth of an hour; a description of the work that was
20 performed during the indicated time period; and identification of the case to which the time should be
21 charged. All attorneys and legal staff at CREEC have kept contemporaneous records documenting in
22 detail all time spent on this matter, including recording of the date and amount of time spent on a task
23 to one-tenth of an hour, and a description of the work that was performed during the indicated time
24 period. Attached hereto as Exhibit A are true and correct records reflecting CREEC's time spent on
25 this case.

26 4. We made every effort not to duplicate billing, and to proceed in an efficient manner,
27 assigning the appropriate attorney or staff member to distinct and necessary tasks based on their
28

1 particular skills and experience.

2 5. I have reviewed CREEC's billing records on an entry-by-entry basis to exercise billing
3 judgment and excise inefficient or duplicative work, clerical entries, and other billing entries that are
4 otherwise inadequate or non-compensable. This reduced the overall lodestar by 1.5%.

5 6. The following table accurately sets forth the timekeepers at CREEC who worked on this
6 matter; their graduation dates; their hourly rates that we are seeking; and the number of hours that they
7 worked, after the exercise of billing judgment:

Name	Position	Years of Experience/Grad Year	Hour	2020 Rates	Total
Amy Robertson	Co-Executive Director	32 years/1988	12.1	\$895	\$10,829.50
Tim Fox	Co-Executive Director	29 years/1991	61.3	\$890	\$54,557
Sarah Morris	Staff Attorney	10 years/2010	80.2	\$520	\$41,704
Marissa McGarry	Paralegal	6 years	17.2	\$265	\$4558
Arielle Milkman	Paralegal	8 years	13	\$265	\$3445
Ana Diaz	Paralegal	3 years	1.5	\$265	\$397.50
Sophie Breene	Paralegal	8 years	.7	\$265	\$185.50
CREEC Lodestar					\$115,676.50

16
17 7. CREEC's 2020 rates represent a modest increase from 2019. For example, my hourly
18 rate increased less than 2%, from \$875 to \$890, from 2019 to 2020. The rate for CREEC's second top
19 timekeeper, Sarah Morris, increased 4%, from \$500 to \$520, from 2019 to 2020. Using CREEC's 2019
20 rates, CREEC's lodestar is \$112,809.50.

21 8. Class Counsel's current out-of-pocket expenses are approximately \$803.47 for travel
22 expenses. Attached hereto as Exhibit B are true and correct records reflecting the expenses we have
23 incurred in this litigation, as well as an itemized summary of these expenses.

24 9. CREEC's costs and out-of-pocket expenses are minimal given that the parties engaged
25 in structured negotiations.

26 10. All expenses and costs incurred were necessary for the negotiation and litigation of
27 Plaintiff's claims, and are appropriate given the scope and complexity of this matter.

EXHIBIT A

Civil Rights Education and Enforcement Center

Invoice: San Jose curb cuts

Date worked	Description	Timekeeper	Rate	Time	Total
10/29/2013	Write email to Linda Dardarian about potential new case in San Jose	T. Fox	\$890.00	0.1	\$89.00
10/29/2013	Telcal with person having problems with curbs/sidewalks in San Jose	T. Fox	\$890.00	0.5	\$445.00
12/5/2013	Begin reviewing alteration records provided by San Jose and comparing those to Google Street views to determine whether ADA alterations requirements governing curb cuts were met	T. Fox	\$890.00	0.2	\$178.00
12/5/2013	Create database from records provided by city of alterations to streets	T. Fox	\$890.00	1.1	\$979.00
12/8/2013	Review street alteration records and determine if curb cut regs complied with	T. Fox	\$890.00	4.5	\$4,005.00
12/9/2013	Draft memo to litigation comm	T. Fox	\$890.00	0.5	\$445.00
12/26/2013	Use Google Street view to determine whether corners that have been altered have compliant curb ramps	T. Fox	\$890.00	2.2	\$1,958.00
12/30/2013	Initial calls to Paul Bauer and Artie Lashbrook, potential plaintiff and tester, respectively, in San Jose curb cuts case	A. Milkman	\$265.00	0.5	\$132.50
12/30/2013	Prepare and send out letters to city public works departments; Independent Living Centers re: San Jose curb cuts project	A. Milkman	\$265.00	2.3	\$609.50
12/31/2013	San Jose curb cuts: Call Paul Bauer and do initial intake interview; search for violations based on areas in which he travels	A. Milkman	\$265.00	2	\$530.00
1/2/2014	Write to L. Dardarian email attaching violation s/sheet and screen shots	T. Fox	\$890.00	0.1	\$89.00
1/8/2014	Telephone call with potential plaintiff; discuss same with Arielle Milkman	T. Fox	\$890.00	0.5	\$445.00
1/14/2014	Search for missing curb ramps near San Jose ILC, correspond with San Jose ILC about know your rights training, reaching out to members	A. Milkman	\$265.00	3.4	\$901.00

Date worked	Description	Timekeeper	Rate	Time	Total
1/16/2014	Team conf call reinspecting curb ramps	T. Fox	\$890.00	0.5	\$445.00
1/16/2014	Review photos taken by cocounsel of San Jose curb ramps	T. Fox	\$890.00	0.4	\$356.00
1/16/2014	Team conference call re: San Jose curb cuts	A. Milkman	\$265.00	0.5	\$132.50
1/17/2014	Discuss curb cuts violations in San Jose with Artie Lashbrook	A. Milkman	\$265.00	0.3	\$79.50
1/21/2014	Review photos taken during most recent survey of San Jose curb ramps, and participate in team conference call to discuss same	T. Fox	\$890.00	0.8	\$712.00
1/23/2014	Set up phone call btwn Artie Lashbrook and T. Fox; contact SVILC to gauge interest in collaboration	A. Milkman	\$265.00	1	\$265.00
1/27/2014	Prepare for call with potential plaintiff	T. Fox	\$890.00	0.2	\$178.00
2/5/2014	Telephone call with potential plaintiff	T. Fox	\$890.00	0.2	\$178.00
2/10/2014	Conference call with Linda Dardarian about next steps	T. Fox	\$890.00	0.4	\$356.00
2/13/2014	Identify and track curb cuts violations in San Jose	A. Milkman	\$265.00	3	\$795.00
2/14/2014	Work on demand letter	T. Fox	\$890.00	0.2	\$178.00
2/14/2014	Work on demand letter	T. Fox	\$890.00	1	\$890.00
2/15/2014	Use Google Street view to determine whether curb ramps were installed adjacent to streets that were altered	T. Fox	\$890.00	1.5	\$1,335.00
2/16/2014	Use Google Street view to determine whether curb ramps were installed adjacent to altered streets (6.5)	T. Fox	\$890.00	6.5	\$5,785.00
2/16/2014	finish draft of demand letter (1.1); draft tolling agreement (.5)	T. Fox	\$890.00	1.6	\$1,424.00
2/18/2014	Work on demand letter and attachments	T. Fox	\$890.00	2	\$1,780.00
2/24/2014	review and finalize demand letter	T. Fox	\$890.00	0.5	\$445.00

Date worked	Description	Timekeeper	Rate	Time	Total
3/22/2014	Prepare response to email from city attorney asking about CREEC	T. Fox	\$890.00	0.3	\$267.00
4/18/2014	Email correspondence with opposing counsel and team concerning scheduling telephone call for 4/21/14	S. Morris	\$520.00	0.1	\$52.00
4/21/2014	participate in team conference call to prepare for call with city (.2); participate in call with city about next steps in settlement discussions (.4); participate in follow-up call with team (.1)	T. Fox	\$890.00	0.7	\$623.00
4/21/2014	participate in team conference call to prepare for call with city (.2); participate in call with city about next steps in settlement discussions (.4); participate in follow-up call with team (.1)	S. Morris	\$520.00	0.7	\$364.00
5/1/2014	Conference with T. Fox concerning KYR training	S. Morris	\$520.00	0.1	\$52.00
5/5/2014	Draft requests for information to San Jose, circulate to team	S. Morris	\$520.00	0.9	\$468.00
5/5/2014	Review proposed questions to San Jose of the curb ramp policies etc.	T. Fox	\$890.00	0.2	\$178.00
5/6/2014	Review and edit structured negotiations agreement	T. Fox	\$890.00	0.2	\$178.00
5/8/2014	Review presentation and research regulations	S. Morris	\$520.00	3	\$1,560.00
5/12/2014	Review structured negotiations agreement, and draft proposed cover email	T. Fox	\$890.00	0.3	\$267.00
5/29/2014	Give presentation at Silicon Valley ILC concerning curb ramps and other transportation issues (not including travel)	S. Morris	\$520.00	2	\$1,040.00
7/2/2014	Review database in preparation for teaching Marissa McGarry how to use it (.3); telephone call with Marissa McGarry to explain database (.4)	T. Fox	\$890.00	0.7	\$623.00
7/2/2014	Telephone call with Tim Fox to learn about database	M. McGarry	\$265.00	0.4	\$106.00
7/2/2014	Check San Jose database for curb ramp violations	M. McGarry	\$265.00	5.6	\$1,484.00
7/3/2014	Check San Jose database for curb ramp violations	M. McGarry	\$265.00	4.3	\$1,139.50

Date worked	Description	Timekeeper	Rate	Time	Total
7/24/2014	Telephone call with San Jose attorneys to discuss structured negotiations agreement (.2); telephone calls before and after the San Jose call with team to prepare for, and discuss follow-up, the call was San Jose (.4)	S. Morris	\$520.00	0.6	\$312.00
7/24/2014	Telephone call with San Jose attorneys to discuss structured negotiations agreement (.2); telephone calls before and after the San Jose call with team to prepare for, and discuss follow-up, the call was San Jose (.4)	T. Fox	\$890.00	0.6	\$534.00
7/25/2014	Research and draft memo re: status of negotiations and documentation/discovery to date	S. Morris	\$520.00	0.9	\$468.00
7/29/2014	Review transition plans; revise and circulate status memo per T. Fox comments	S. Morris	\$520.00	1	\$520.00
8/3/2014	Participate in call with team to prepare for call with city(.2); participate in call with city to discuss next steps (.2)	T. Fox	\$890.00	0.4	\$356.00
9/3/2014	Call with team to determine strategy for call with City re: next steps after signing structured negotiations agreement (.2); call with City (.2) to discuss same and process for responding to requests for information; review and update ROIs and send to T. Fox (.1)	S. Morris	\$520.00	0.5	\$260.00
10/14/2014	Begin reviewing materials provided by San Jose	T. Fox	\$890.00	0.3	\$267.00
10/15/2014	Initial review and organization of San Jose response to requests for information	S. Morris	\$520.00	0.3	\$156.00
10/22/2014	Review San Jose response to questions and ADA ramp database	M. McGarry	\$265.00	1.5	\$397.50
10/27/2014	Draft email to team summarizing research into SJ response	M. McGarry	\$265.00	0.4	\$106.00
11/10/2014	Review San Jose responses to ROIs, analyses prepared by A. Lee and M. McGarry (.6); participate in team conference call to discuss next steps (.3)	S. Morris	\$520.00	0.9	\$468.00

Date worked	Description	Timekeeper	Rate	Time	Total
11/10/2014	review materials provided by San Jose(1); participate in team conference call to discuss next steps (.3)	T. Fox	\$890.00	1.3	\$1,157.00
12/8/2014	TCWs co-counsel re: planning draft of position paper and scheduling meeting (.6); prep for call by reviewing position papers and summaries by A. Lee and M. McGarry (.5)	S. Morris	\$520.00	1.1	\$572.00
12/8/2014	TCW city attorney & co-counsel re: planning a meeting and, in advance, an exchange of position papers.	S. Morris	\$520.00	0.3	\$156.00
12/8/2014	TCW co-counsel re: planning draft of position paper and scheduling meeting.	A. Robertson	\$895.00	0.6	\$537.00
12/8/2014	Prepare for call with team & city attorney.	A. Robertson	\$895.00	1.5	\$1,342.50
12/8/2014	TCW city attorney & co-counsel re: planning a meeting and, in advance, an exchange of position papers.	A. Robertson	\$895.00	0.3	\$268.50
12/12/2014	Emails to ILC re: prospective clients and draft blurb re: same	S. Morris	\$520.00	0.3	\$156.00
12/12/2014	Read Kirola v. SF	S. Morris	\$520.00	1	\$520.00
12/19/2014	Email with A. Lee and S. Kirkpatrick; create 2 maps for San Jose position paper	M. McGarry	\$265.00	0.8	\$212.00
12/23/2014	Format Mt. Pleasant high school map for position paper; email w/ S. Kirkpatrick	M. McGarry	\$265.00	0.9	\$238.50
12/31/2014	Review and comment on draft position paper	S. Morris	\$520.00	1.9	\$988.00
1/2/2015	Review and comment on draft position paper	S. Morris	\$520.00	4	\$2,080.00
1/5/2015	Draft mails to prospective plaintiffs from Corbett	S. Morris	\$520.00	0.3	\$156.00
1/6/2015	Revise position paper with A. Robertson's comments and conferences re: same; draft email circulating comments to team	S. Morris	\$520.00	1.2	\$624.00

Date worked	Description	Timekeeper	Rate	Time	Total
1/6/2015	Create/edit/compile narrative and neighborhood maps for position paper	M. McGarry	\$265.00	2	\$530.00
1/7/2015	Create/edit/compile narrative and neighborhood maps for position paper	M. McGarry	\$265.00	0.6	\$159.00
1/9/2015	Edit Calabazas map for position paper	M. McGarry	\$265.00	0.3	\$79.50
1/9/2015	TCW A. Robertson, L. Dardarian, A. Lee re: finalizing position paper and strategy for meeting with City (.4); prep before call (.1) and meeting with A. Robertson after (.1)	S. Morris	\$520.00	0.6	\$312.00
1/9/2015	TCW co-counsel re: edits to letter & preparation for meeting with San Jose city attorney.	A. Robertson	\$895.00	0.5	\$447.50
1/12/2015	Edit/compile maps for position paper	M. McGarry	\$265.00	0.4	\$106.00
1/21/2015	Follow up with ILC and potential tester plaintiffs	S. Morris	\$520.00	0.1	\$52.00
1/22/2015	Call with J. Jokinen and vm for F. Merrill; update email to team	S. Morris	\$520.00	0.5	\$260.00
1/23/2015	Call with J. Jokinen re: next steps; update email to team re: same	S. Morris	\$520.00	0.2	\$104.00
1/29/2015	VMs and call with J. Jokinen re: scheduling meetings	S. Morris	\$520.00	0.2	\$104.00
2/2/2015	Review response from City (.3); review and prepare for settlement meeting by, e.g., reviewing our position paper and exhibits (1)	S. Morris	\$520.00	1.3	\$676.00
2/3/2015	Read letter from San Jose; prepare for and participate in call with team re; settlement meeting tomorrow.	A. Robertson	\$895.00	0.5	\$447.50
2/3/2015	Review transition plan and updates to prepare for settlement meeting (3.5); TCW L. Dardarian, A. Lee, A. Robertson to discuss City response and prep for settlement meeting with City (.4)	S. Morris	\$520.00	3.9	\$2,028.00
2/4/2015	MTW City to discuss settlement proposal	S. Morris	\$520.00	1.2	\$624.00

Date worked	Description	Timekeeper	Rate	Time	Total
2/4/2015	MTWs L. Dardarian and A. Lashbrook before (.2) and after (.3) settlement meeting to discuss status	S. Morris	\$520.00	0.5	\$260.00
2/4/2015	Flights to and from San Jose for settlement meeting, including 1 hour prep on the plane (7.2); and 1.8 driving to DIA	S. Morris	\$520.00	9	\$4,680.00
3/16/2015	Research statute of limitations issue	S. Morris	\$520.00	3	\$1,560.00
3/19/2015	Research statute of limitations issue and draft response to J. Calegari	S. Morris	\$520.00	3.5	\$1,820.00
3/20/2015	Research statute of limitations issue and draft response to J. Calegari (1.4); revise per A. Robertson's comments and circulate to team (.1)	S. Morris	\$520.00	1.5	\$780.00
4/24/2015	Emails to team and OC re: response to SOL issue	S. Morris	\$520.00	0.2	\$104.00
5/6/2015	TCW A. Lee re: next steps for negotiations with San Jose	S. Morris	\$520.00	0.3	\$156.00
5/18/2015	TCW Jeff Jokinen re: status of case (.1)	S. Morris	\$520.00	0.2	\$104.00
6/25/2015	Review and revise settlement bullet points to send to city, including investigation of current online website and form for requesting a curb	S. Morris	\$520.00	2.8	\$1,456.00
6/25/2015	Review bullet points for San Jose city attorneys.	A. Robertson	\$895.00	0.2	\$179.00
6/26/2015	Review revised bullet points, draft email to city, similar settlements all to send to City	S. Morris	\$520.00	0.3	\$156.00
6/30/2015	Review and update summary re: Jeff Jokinen	S. Morris	\$520.00	0.3	\$156.00
7/1/2015	Travel to/from San Francisco to San Jose to interview witness & observe and measure curb cuts.	A. Robertson	\$895.00	7.5	\$6,712.50
7/6/2015	Research student disability orgs.	S. Breene	\$265.00	0.7	\$185.50
7/6/2015	Review research re: student groups from S. Breene; draft and send emails to student groups and correspond with SJSU representative (O. loan)	S. Morris	\$520.00	0.5	\$260.00

Date worked	Description	Timekeeper	Rate	Time	Total
7/11/2015	Emails with SJSU student representative re: potential interested claimants	S. Morris	\$520.00	0.1	\$52.00
7/22/2015	Multiple meetings, calls and emails with (variously) S. Morris, A. Lee, D. May & M. McGarry re: possible additional claimants in San Jose.	A. Robertson	\$895.00	0.5	\$447.50
7/22/2015	Emails to potential plaintiffs and team re: contacting potential plaintiffs	S. Morris	\$520.00	0.5	\$260.00
7/29/2015	TCW team to prepare for call with City.	A. Robertson	\$895.00	0.5	\$447.50
7/29/2015	Team call to prepare for settlement call with City (.5); prepare for team call (.5)	S. Morris	\$520.00	1	\$520.00
7/31/2015	Prepare for (1) and TCW city and team to discuss settlement points (1); TCW team following up (.2); TCW A. Robertson to update (.1)	S. Morris	\$520.00	2.3	\$1,196.00
9/8/2015	Review City counter proposal and emails to team re: same	S. Morris	\$520.00	1.2	\$624.00
9/10/2015	Research and draft response to City's counter proposal	S. Morris	\$520.00	6.3	\$3,276.00
9/15/2015	Research and finalize response letter to city re: its counterproposal	S. Morris	\$520.00	2.5	\$1,300.00
9/17/2015	TCW L. Dardarian re: response to settlement letter	S. Morris	\$520.00	0.2	\$104.00
9/21/2015	Research and revise response to counterproposal (re: temporary routes and other issues), including review Long Beach cert decision, and recirculate to team	S. Morris	\$520.00	2	\$1,040.00
9/22/2015	Finalize and circulate response to counter proposal letter	S. Morris	\$520.00	0.2	\$104.00
9/25/2015	Prepare for call with City by reviewing past letters and memos (2); TCW City and our team re: City's counterproposal (.9); TCW L. Dardarian and A. Lee re: next steps (.2); MTW A. Robertson for update (.1)	S. Morris	\$520.00	3.2	\$1,664.00
9/29/2015	TCW L. Dardarian and A. Lee re: using Sutter settlement as model	S. Morris	\$520.00	0.3	\$156.00

Date worked	Description	Timekeeper	Rate	Time	Total
10/14/2015	Prepare for call with city (review Sutter, other materials) (1); call with city and A. Lee and L. Dardarian (.5); follow up call with A. Lee and L. Dardarian (.2)	S. Morris	\$520.00	1.7	\$884.00
10/20/2015	Review and edit summary/proposal email from A. Lee to City	S. Morris	\$520.00	0.2	\$104.00
12/15/2015	Emails with team re: next steps in responding to City letter	S. Morris	\$520.00	0.1	\$52.00
12/21/2015	TCW team re: response to City's counteroffer (.3); prep by reviewing prior letters and notes from call (1); draft response to City counteroffer (2.2)	S. Morris	\$520.00	3.5	\$1,820.00
12/22/2015	Draft response to City counteroffer	S. Morris	\$520.00	2	\$1,040.00
12/23/2015	Edit letter per GBDH comments and circulate to City	S. Morris	\$520.00	0.3	\$156.00
1/25/2016	Conference call with team to prepare for call with city concerning interim agreement	T. Fox	\$890.00	0.3	\$267.00
1/25/2016	Conference call with team to prepare for call with city concerning interim agreement (.3); Call with City re: interim agreement (1); follow up call with team (.1)	S. Morris	\$520.00	1.4	\$728.00
2/16/2016	Review draft email to city concerning their survey form	T. Fox	\$890.00	0.1	\$89.00
5/31/2016	Telephone call with cocounsel and City concerning interim settlement agreement	T. Fox	\$890.00	0.9	\$801.00
5/31/2016	Telephone call with Andrew Lee and Linda Dardarian to prepare for settlement call with city	T. Fox	\$890.00	0.6	\$534.00
6/1/2016	Prepare for call with city to discuss number of ramps expected to be installed in 2016 and 2017, and next steps towards interim agreement (.2); participate in that call (.9)	T. Fox	\$890.00	1.1	\$979.00
7/5/2016	Review and edit draft interim settlement agreement	T. Fox	\$890.00	0.9	\$801.00
7/6/2016	Review revised settlement agreement and transmittal email	T. Fox	\$890.00	0.2	\$178.00

Date worked	Description	Timekeeper	Rate	Time	Total
8/24/2016	Telcal with L. Dardarian and A. Lee re City's settlement edits	T. Fox	\$890.00	0.9	\$801.00
8/24/2016	Participate in conference call with City to discuss revisions to settlement agreement	T. Fox	\$890.00	1.6	\$1,424.00
8/25/2016	Review and edit draft interim settlement agreement	T. Fox	\$890.00	0.2	\$178.00
1/13/2017	Telephone call with AL, LD and city to discuss status of survey and settlement agreement (.3); follow-up call with AL and LD (.2)	T. Fox	\$890.00	0.5	\$445.00
5/23/2018	Review semiannual report from city as well as survey results (.6); participate in call with Linda Dardarian and Andrew Lee to prepare for call the city concerning the semiannual report and survey results (.5); participate in call with city (.9); participate in follow-up call with Linda Dardarian and Andrew Lee to discuss issues that came up during the call with the city (.2)	T. Fox	\$890.00	2.2	\$1,958.00
6/4/2018	Review extension of interim agreement	T. Fox	\$890.00	0.1	\$89.00
6/18/2018	Prepare for call with city to discuss interim agreement and next steps (.2); participate in that call (.6)	T. Fox	\$890.00	0.8	\$712.00
6/21/2018	Review City's proposed changes to second interim agreement	T. Fox	\$890.00	0.1	\$89.00
8/9/2018	Telephone call with Linda Dardarian and Andrew Lee to prepare for call with city (.3); participate in call with city (.9)	T. Fox	\$890.00	1.2	\$1,068.00
9/26/2018	Participate in call with City to discuss survey results and next steps (.5); participate in conference call with cocounsel following up on call with city (.2)	T. Fox	\$890.00	0.7	\$623.00
11/13/2018	Telephone call with Linda Dardarian and Andrew Lee to prepare for call with City (.4); participate in telephone call with City concerning settlement (.3); follow-up call with Linda Dardarian and Andrew Lee (.1)	T. Fox	\$890.00	0.8	\$712.00

Date worked	Description	Timekeeper	Rate	Time	Total
11/16/2018	Participate in telephone call with City and Linda Dardarian and Andrew Lee concerning settlement (.9); participate in follow-up call with Linda Dardarian and Andrew Lee (.2); review draft email from Linda Dardarian setting forth counterproposal (.2)	T. Fox	\$890.00	1.3	\$1,157.00
11/28/2018	Prepare for settlement call by reviewing last proposal (.1); participate in settlement call with city (.6)	T. Fox	\$890.00	0.7	\$623.00
12/10/2018	Prepare for call with city (.1); participate in that settlement call (.6)	T. Fox	\$890.00	0.7	\$623.00
2/7/2019	Review and edit draft consent decree	T. Fox	\$890.00	0.4	\$356.00
3/14/2019	Review City's edits to settlement agreement (.5); discuss same with Linda Dardarian and Andrew Lee (.7); participate in call with City to discuss settlement (1.2)	T. Fox	\$890.00	2.4	\$2,136.00
3/24/2019	Review and comment on revisions to draft settlement agreement	T. Fox	\$890.00	0.6	\$534.00
3/25/2019	Review revised consent decree	T. Fox	\$890.00	0.1	\$89.00
4/3/2019	Review draft correspondence to class members, and draft insert describing CREEC (.2)	T. Fox	\$890.00	0.2	\$178.00
4/11/2019	Review City's responses to draft settlement agreement (.2); telephone call with Linda Dardarian and Andrew Lee to prepare for call with city (.4); telcal with city (.9); follow up call with L. Dardarian and A. Lee (.1)	T. Fox	\$890.00	1.6	\$1,424.00
4/30/2019	Review city's changes to settlement agreement, and dictate memo to team with my thoughts	T. Fox	\$890.00	0.5	\$445.00
5/3/2019	Telephone call with Andrew Lee and Linda Dardarian to prepare for call with city concerning settlement (.1); participate in call with city (.6); participate in follow-up call with Andrew Lee and Linda Dardarian (.1)	T. Fox	\$890.00	0.8	\$712.00
5/15/2019	Review edits to consent decree	T. Fox	\$890.00	0.2	\$178.00
5/16/2019	Review and edit letter requesting monetary relief (.4)	T. Fox	\$890.00	0.4	\$356.00

Date worked	Description	Timekeeper	Rate	Time	Total
5/23/2019	Review draft letter seeking fees and damages (.2)	T. Fox	\$890.00	0.2	\$178.00
7/12/2019	Telephone call with Linda Dardarian and Andrew Lee to prepare for settlement call with city (.2); Participate in call with city (.8)	T. Fox	\$890.00	1	\$890.00
7/26/2019	Participate in call with city to discuss attorneys' fees (.2); participate in follow-up call with cocounsel (.1)	T. Fox	\$890.00	0.3	\$267.00
8/7/2019	Review and edit complaint	T. Fox	\$890.00	0.6	\$534.00
9/11/2019	Participate in call with the city to discuss remaining settlement issues (.4); follow-up call with Andrew Lee (.1)	T. Fox	\$890.00	0.5	\$445.00
10/18/2019	Telephone call with city to discuss damages and fees (.4); follow-up call with Linda Dardarian and Andrew Lee (.4)	T. Fox	\$890.00	0.8	\$712.00
10/19/2019	Review, and respond to, draft email concerning our monitoring in other cases	T. Fox	\$890.00	0.1	\$89.00
11/11/2019	Review and comment on revised consent decree	T. Fox	\$890.00	0.2	\$178.00
11/22/2019	Participate in call with city to discuss fees (.5); participate in follow-up call with Linda Dardarian and Andrew Lee (.4)	T. Fox	\$890.00	0.9	\$801.00
12/3/2019	Review, and respond to, Andrew Lee's email with suggested changes in monitoring language (.1);	T. Fox	\$890.00	0.1	\$89.00
1/9/2020	Participate in call with city	T. Fox	\$890.00	0.2	\$178.00
2/20/2020	Review draft pleadings (.3)	T. Fox	\$890.00	0.3	\$267.00
3/5/2020	Review and edit preliminary approval motion	T. Fox	\$890.00	1	\$890.00
3/26/2020	Read and respond to email concerning declaration in support of motion for preliminary approval	T. Fox	\$890.00	0.1	\$89.00
3/26/2020	Review and edit declaration in support of motion for preliminary approval	T. Fox	\$890.00	0.2	\$178.00

Date worked	Description	Timekeeper	Rate	Time	Total
3/26/2020	Draft Declaration of T. Fox	A. Diaz	\$265.00	1	\$265.00
4/1/2020	Look up N.D. Cal. local rules re: service of complaint	A. Diaz	\$265.00	0.1	\$26.50
5/21/2020	Review notice provisions of motion for preliminary approval	T. Fox	\$890.00	0.1	\$89.00
5/21/2020	Work on notice including saving notice class and list of organizations to receive notice, drafting notice letter, and creating spreadsheet to track issuance of notice	A. Diaz	\$265.00	0.4	\$106.00
5/27/2020	Prepare for preliminary approval hearing (.3); participate in that hearing (.8)	T. Fox	\$890.00	1.1	\$979.00
				Total:	\$115,676.50

EXHIBIT B

Lashbrook v. City of San Jose, No. 20-cv-01236-NC
Expenses

Travel to San Jose for February 4, 2015 Settlement Meeting

Flights		
1/6/2015 Southwest Airlines, flight to Denver		\$34.00
1/6/2015 Southwest Airlines, flight to Denver		\$4.00
1/13/2015 Travel Guard insurance for flight		\$10.95
2/2/2015 Southwest Airlines, flight to SJC		\$82.50
Meals		
2/4/2015 Caribou Coffee		\$4.70
2/4/2015 Starbucks		\$4.13
2/4/2015 Taqueria San Jose		\$7.01
2/4/2015 4th St. Pizza Co.		\$5.25
2/4/2015 4th St. Pizza Co.		\$6.44
Ground Transportation and Parking		
2/4/2015 Yellow Cab		\$23.04
2/4/2015 Mileage to airport		\$28.75
2/5/2015 DIA Parking Operations		\$23.00
	Subtotal	\$233.77

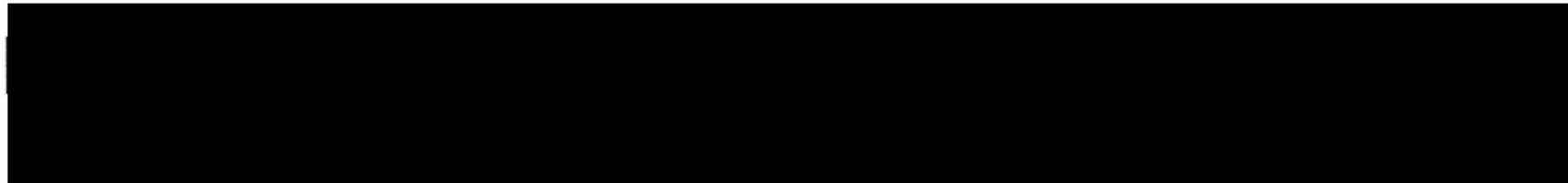
Travel to San Jose for May 29, 2014 Know Your Rights presentation

Flights		
5/9/2014 United airlines, roundtrip flight to SJC		\$338.00
5/29/2020 United airlines		\$3.29
Lodging		
5/30/2020 Ramada		\$124.26
Meals		
5/28/2020 Dosa & Curry Café San Jose CA		\$15.02
5/29/2020 TCBY DIA Denver		\$5.55
5/29/2020 Rainbow Cab		\$24.00
5/29/2020 Peets Coffee		\$5.20
5/29/2020 TA Sonoma		\$12.38
Ground Transportation and Parking		
5/29/2020 DIA Parking		\$24.00
6/4/2020 Milpitas Cab, San Jose		\$18.00
	Subtotal	\$569.70
	Total Expenses	\$803.47

ACCOUNT ACTIVITY (CONTINUED)

Date of Transaction	Merchant Name or Transaction Description	\$ Amount
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
02/02	SOUTHWES 5262479603970 800-435-9792 TX 1 R LAS SJC 2 RO SJC DEN	82.50
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
02/04	CARIBOU COFFEE DENVER CO	4.70
02/04	SQ *YELLOW CAB San Jose CA	23.04
02/04	NC-5 STARBUCKS30101547 SAN JOSE CA	4.13
02/04	TAQUERIA SAN JOSE SAN JOSE CA	7.01
02/04	4TH ST. PIZZA CO SAN JOSE CA	5.25
02/05	DIA PARKING OPERATIONS 303-342-4633 CO	23.00
02/04	4TH ST. PIZZA CO SAN JOSE CA	6.44
[REDACTED]	[REDACTED]	[REDACTED]
01/06	SOUTHWES 5262472001202 800-435-9792 TX 1 R SJC DEN	34.00
[REDACTED]	[REDACTED]	[REDACTED]
01/06	SOUTHWES 5262472001206 800-435-9792 TX 1 R SJC DEN	4.00
01/13	TRAVEL GUARD GROUP INC 800-826-1300 WI	10.95
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Sarah - Mileage Expenses 1.13.15 - 4.17.15				
Trip Description	Case	Date	Miles (r/t)	Reimbursement @ .57.5/mile
Airport	San Jose <i>Curbside</i>	2/4/2015	50	28.75



QB

