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6 CASE #: 22-2-19810-9 SEA

7 THE HONORABLE HAYDEE VARGAS
8 Department 12
9 Hearing Date: Friday, July 24, 2026, 9:00 a.m.
10 With Oral Argument

11 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
12 COUNTY OF KING

13 CHELSEA RUTTER and MAGDALENA CHAVEZ,
14 individually and behalf of all others similarly
15 situated,

16 Plaintiffs,

17 v.

18 BRIGHT HORIZONS FAMILY SOLUTIONS, INC.
19 d/b/a BRIGHT HORIZONS CHILDREN'S
20 CENTERS, INC.,

21 Defendant.

NO. 22-2-19810-9 SEA

**DECLARATION OF TOBY J. MARSHALL IN
SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS AND SERVICE
AWARDS**

22 I, Toby J. Marshall, declare as follows:

23 **A. Background and experience**

24 1. I am a member of the law firm of Terrell Marshall Law Group PLLC and co-
25 counsel of record for Plaintiffs in this matter. I am admitted to practice before this Court and
26 am a member in good standing of the bar of the state of Washington. I respectfully submit this
27 declaration in support of Plaintiffs' Motion for Attorneys' Fees, Costs and Service Awards.

1 Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration
2 and could testify competently to them if called upon to do so.

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

10 3. I am a founding member of Terrell Marshall and represent clients in a wide
11 variety of class actions and other complex litigation, including wage and hour, product defect,
12 civil rights, and consumer protection cases. I have served as co-lead counsel in numerous class
13 and collective actions and have tried and won individual and class cases in state and federal
14 court. I have also argued several times before the Washington Supreme Court, the Washington
15 Court of Appeals, and the Ninth Circuit Court of Appeals. In 2002, I received my J.D. from the
16 University of Washington School of Law, where I served on the Moot Court Honor Board and
17 was selected to the Order of Barristers. Before forming Terrell Marshall, I was a member of
18 Tousley Brain Stephens PLLC. I regularly speak at seminars on employment and class action
19 issues. I am a member of the Washington Employment Lawyers Association and serve on
20 WELA's amicus and legislative committees. I have been named several times to the Washington
21 Super Lawyers list.

22 **B. Qualifications of other Terrell Marshall attorneys**

23 4. Beth E. Terrell is a founding member of Terrell Marshall. With thirty years of
24 experience, Ms. Terrell concentrates her practice in complex litigation, including the
25 prosecution of multi-plaintiff, collective, mass and class litigation and arbitration on behalf of
26 consumers and workers. Ms. Terrell has served as co-lead counsel on multi-state and
27 nationwide class actions, resulting in hundreds of millions of dollars in settlements for

1 consumers and workers. Ms. Terrell also represents individual employees with discrimination,
2 sexual harassment, trade secret and restrictive covenant claims. Ms. Terrell co-chairs PLI's
3 Consumer Financial Services Institute, is a past President of the Public Justice Foundation Board
4 of Directors, serves as Chair of both the Northwest Consumer Law Center and the Washington
5 Employment Lawyers Association, and is a fellow of the American College of Consumer
6 Financial Services Lawyers. In 2023, Ms. Terrell was awarded the National Consumer Law
7 Center's Vern Countryman Award, recognizing special contributions to consumer law. A
8 member of the State Bar of California and the Washington State Bar Association, Ms. Terrell
9 frequently presents on a wide variety of topics, including class actions, consumer protection,
10 legal ethics, gender equity, and electronic discovery.

11 5. Amanda M. Steiner became a member of Terrell Marshall in 2015. She practices
12 complex litigation, including the prosecution of consumer, defective product, wage and hour,
13 and civil rights class actions. Ms. Steiner received her J.D. from the UC Berkeley School of Law in
14 1997. Admitted in Washington, California, New York and Hawaii, she has authored briefs that
15 have resulted in numerous favorable decisions for plaintiffs in high-profile and complex
16 securities, antitrust, consumer and civil rights class actions in federal and state courts
17 throughout the United States. Ms. Steiner was selected for inclusion in the annual Northern
18 California "Super Lawyers" list and was named to the Top 50 Women Lawyers of Northern
19 California. She is a Fellow of the American Bar Foundation.

20 6. Blythe H. Chandler joined Terrell Marshall in 2014 and became a member in
21 2018. Ms. Chandler practices complex litigation with a focus on prosecution of consumer class
22 actions. She has been appointed class counsel in cases challenging a wide range of unfair or
23 deceptive practices, including debt collection practices. In 2010, she received her J.D. from the
24 University of Washington School of Law with high honors, Order of the Coif. Ms. Chandler
25 served as Chief Articles Editor for the Washington Law Review. Before joining Terrell Marshall,
26 Ms. Chandler served as a law clerk to the Honorable Betty B. Fletcher, Senior United States
27 Circuit Judge for the Ninth Circuit Court of Appeals, and to the Honorable John C. Coughenour,

1 Senior United States District Judge for the Western District of Washington. Ms. Chandler also
2 served as a judicial extern to the Honorable Robert S. Lasnik, United States District Judge for the
3 Western District of Washington. Ms. Chandler co-authored chapters of the Consumer
4 Protection Deskbook published by the Washington State Association for Justice (WSAJ) and has
5 spoken on topics including use of experts and personal jurisdiction in class actions. Ms.
6 Chandler is a member of the Public Justice Foundation Board of Directors, is a Co-Coordinator
7 of the Washington Employment Lawyers Association (WELA) Amicus Committee and currently
8 co-chairs WSJA's Consumer Protection Section. She was named to the 2020 Rising Star List by
9 Washington Super Lawyers.

10 7. Elizabeth A. Adams is a member of the law firm of Terrell Marshall, counsel of
11 record for plaintiffs in this matter. She is admitted to practice before this Court and is a
12 member in good standing of the bars of the states of Washington and California. She joined
13 Terrell Marshall in 2015 and became a member of Terrell Marshall in 2022. She concentrates
14 her practice in complex litigation, including the prosecution of consumer, wage and hour, and
15 civil rights class actions. In 2012, she received her J.D. from the UCLA School of Law, where she
16 received the Order of the Coif and served as a Comments Editor for the UCLA Law Review.
17 Before joining Terrell Marshall, she served as a law clerk to the Honorable Dean D. Pregerson,
18 the Honorable George Wu, and the Honorable John A. Kronstadt, all of the United States
19 District Court for the Central District of California. She is a member of the Washington
20 Employment Lawyers Association, Washington State Association for Justice Eagle member,
21 Public Justice Student Civil Rights Committee member, and was a member of the Eastern
22 District of Washington Local Civil Rules Committee for 2024.

23 8. Eden Nordby is an associate at Terrell Marshall. Ms. Nordby joined Terrell
24 Marshall as an associate in 2021. Ms. Nordby concentrates her practice on complex civil
25 litigation, including consumer protection and wage and hour class actions. Ms. Nordby also
26 litigates employment discrimination, wrongful termination, and commercial disputes. Ms.
27 Nordby received her J.D. from the University of Washington in 2021. During law school Ms.

1 Nordby served as Executive Managing Editor of the Washington Journal of Environmental Law
2 and Policy. She received the WSBA Labor & Employment Section 2019 Summer Grant for her
3 public service work and commitment to labor and employment issues. Ms. Nordby is trained as
4 a mediator and mediated a number of individual civil matters through the UW School of Law
5 Mediation Clinic. Before joining the firm as an attorney, Ms. Nordby was a senior paralegal at
6 Terrell Marshall from the time the firm opened in 2008 until starting law school in 2018.

7 9. Eleanor Eagan joined Terrell Marshall Law Group in 2025. Ms.
8 Eagan concentrates her practice in complex litigation and consumer protection. Ms.
9 Eagan received her J.D. from the University of Washington in 2025 and was honored with the
10 Order of the Coif. During law school, Ms. Eagan served as the Senior Articles Editor for the
11 Washington International Law Journal and worked in the Regulatory Environmental Law and
12 Policy Clinic.

13 10. Elizabeth Schatz Cordero joined Terrell Marshall Law Group as an associate in
14 2025. Ms. Schatz Cordero concentrates her practice in complex civil litigation, including
15 consumer protection and wage and hour class actions. Ms. Schatz Cordero received her J.D.
16 from the University of California, Irvine School of Law in 2023, graduating *summa cum laude*.
17 During law school, Ms. Schatz Cordero worked in the Environmental Law Clinic and in the
18 Workers, Law, and Organizing Clinic. Prior to joining Terrell Marshall, Ms. Schatz Cordero
19 clerked for the Honorable John H. Chun in the Western District of Washington and worked as a
20 staff attorney at the United States Court of Appeals for the Ninth Circuit.

21 **C. Other cases litigated by Terrell Marshall**

22 11. Examples of wage and hour class and collective actions that Terrell Marshall is
23 litigating or has litigated to successful completion include:

- 24 a. *Barnett, et al. v. Wal-Mart Stores, Inc.* — Filed in 2001 on behalf
25 of Washington employees who alleged wage and hour violations
26 by the country's largest private employer. Terrell Marshall
27 obtained certification on behalf of the class of 90,000 current
and former employees and was preparing for trial when the

1 case settled. The King County Superior Court granted final
2 approval of the \$35 million settlement on July 20, 2009.

- 3 b. *Burnett v. Pagliacci Pizza, Inc.*— Filed in 2017 on behalf of pizza
4 delivery drivers who alleged violations of state wage and hour
5 laws. The Washington Supreme Court ruled that the drivers’
6 claims were not subject to mandatory arbitration. *Burnett v.*
7 *Pagliacci Pizza, Inc.*, 196 Wash.2d 38, 470 P.3d 486 (2020). The
8 King County Superior Court granted final approval of a \$3.785
9 million settlement on July 16, 2021.
- 10 c. *Spencer v. FedEx Ground Package Sys., Inc.*— Filed in 2014 on
11 behalf of delivery drivers who alleged violations of state wage
12 and hour laws. The Superior Court of King County granted final
13 approval of the \$10.5 million settlement on December 2, 2016.
- 14 d. *Mendis v. Schneider Nat’l Carriers, Inc.*— Filed in 2014 on behalf
15 of more than 1,200 truck drivers who alleged wage and hour
16 violations, including failure to pay for rest breaks and overtime,
17 and unlawful deductions from wages. The Western District of
18 Washington granted final approval of the \$5.75 million
19 settlement on November 13, 2018.
- 20 e. *Lowry v. Ralph’s Concrete Pumping, Inc.*— Filed in 2012 on
21 behalf of 200 employees who alleged violations of Washington
22 rest and meal break, minimum wage, and prevailing wage laws.
23 The King County Superior Court granted final approval of the
24 \$2.55 million settlement on December 10, 2018.
- 25 f. *Rhode v. T-Mobile USA, Inc.*— Filed in 2015 on behalf of retail
26 sales associates who alleged T-Mobile failed to properly and
27 timely pay them all their earned commissions in violation of
Washington law. The King County Superior Court granted final
approval of the \$1.27 million settlement on May 24, 2019.
- g. *Helde v. Knight Transp., Inc.*— Filed in 2012 on behalf of truck
drivers who alleged violations of wage and hour laws in
Washington, including failure to pay for rest breaks and
unlawful deductions from wages. The Western District of
Washington granted final approval of the \$1.45 million
settlement and separately awarded \$1.2 million in attorneys’
fees and costs in October 2017.

- 1 h. *Tolliver, et al. v. Avvo, Inc.*— Filed in 2016 on behalf of sales
2 employees who alleged they were misclassified as overtime
3 exempt. The King County Superior Court granted final approval
4 of the \$1.75 million settlement on September 15, 2017.
- 5 i. *Garrett v. The CJS Solutions Grp., LLC*— Filed in 2017 on behalf
6 of employees who alleged they had been misclassified as
7 independent contractors and who were therefore not paid
8 overtime compensation in violation of state and federal law.
9 The Southern District of New York granted final approval of the
10 \$3.24 million settlement on June 26, 2018.
- 11 j. *Kariuki v. Pacific Bells, LLC*— Filed in 2017 on behalf of
12 employees of several Taco Bell franchises who alleged they
13 were not provided with proper rest and meal breaks, among
14 other violations. The King County Superior Court granted final
15 approval of the \$750,000 settlement on July 11, 2019.
- 16 k. *Carranza v. Dovex Fruit Co.*— Filed in 2016 on behalf of migrant
17 and seasonal farm workers who alleged their employer failed to
18 pay for all hours worked. Terrell Marshall successfully litigated
19 the claims, which resulted in an opinion by the Washington
20 Supreme Court in *Carranza v. Dovex Fruit Company*, 190 Wn.2d
21 612 (2018). Following the Washington Supreme Court decision,
22 the Eastern District of Washington granted final approval of the
23 \$1.22 million settlement on August 22, 2019.
- 24 l. *Martinez v. Auvil Fruit Co.*— Filed in 2016 on behalf of more
25 than 4,000 migrant and seasonal farm workers who alleged
26 their employer failed to pay for all hours worked, including rest
27 breaks, in violation of Washington law. The Eastern District of
Washington granted final approval of the \$2.5 million
settlement on October 10, 2018.
- m. *Paz v. Sakuma Brothers Farms, Inc.*— Filed in 2013 on behalf of
almost 1,000 migrant and seasonal berry pickers who alleged
violations of state wage and hour law and the federal
Agricultural Worker Protection Act. The Western District of
Washington approved two settlements totaling more than
\$935,000 with a separate payment of attorneys’ fees and costs
of more than \$239,000. The primary claims in the case settled
for \$850,000 plus an agreement on injunctive relief, which the
court approved in November 2014. Terrell Marshall successfully
litigated additional claims not covered by the 2014 settlement,

1 which resulted in a unanimous opinion by the Washington
2 Supreme Court in *Lopez Demetrio v. Sakuma Brothers Farms,*
3 *Inc.*, 183 Wn.2d 649 (2015). Following the Washington Supreme
4 Court decision, the court approved a final settlement of all
claims and ordered payment of plaintiffs' attorneys' fees and
costs on July 8, 2016.

- 5 n. *Witschel v. IMCO General Construction, Inc.*— Filed in 2013 on
6 behalf of construction employees who alleged wage and hour
7 violations. The Superior Court of Skagit County granted final
approval of the \$1.1 million settlement on June 16, 2016.
- 8 o. *McCracken v. Pacific Cargo Services, LLC, et al.*— Filed 2011 on
9 behalf of truck drivers in Washington and Oregon who alleged
10 wage and hour violations. The Superior Court of King County
11 granted final approval of the \$475,000 settlement on August 25,
12 2017.
- 13 p. *Hill v. Xerox Business Services, LLC, et al.*—Filed in 2012 on
14 behalf of current or former call center workers who allege
15 violations of state wage and hour laws. The employees prevailed
16 on an appeal that went to the Ninth Circuit and Washington
17 Supreme Court. The Western District of Washington granted
18 final approval of a \$9.1 million settlement in March 2026.
- 19 q. *Ramirez, et al. v. Precision Drywall, Inc.*— Filed in 2008 on behalf
20 of drywall workers who alleged wage and hour violations
21 including rest and meal break and overtime violations. Terrell
22 Marshall represented the class through a five-week jury trial and
obtained a judgment for the workers in excess of \$4 million.
- 23 r. *Hudson v. Oatridge Security Grp., Inc., et al.*— Filed in 2018 on
24 behalf of private security officers who alleged wage and hour
25 violations including rest and meal break and overtime violations.
26 The King County Superior Court granted final approval of the
\$1.75 million settlement on April 9, 2021.
- 27 s. *Tschosik, et al. v. Diamond Freight Systems, Inc., et al.*—Filed in
2016 on behalf of Washington employees who alleged wage and
hour violations including rest and meal break, overtime, and off-
the-clock violations. The Spokane County Superior Court
granted final approval of the \$385,000 settlement on August 30,
2019.

- 1 t. *Ortiz, et al. v. Amazon.com, Inc., et al.*—Filed in 2017 on behalf
2 of nearly 3,000 Amazon delivery drivers who alleged violations
3 of state wage and hour law including rest and meal break,
4 overtime, and off-the-clock violations. The King County Superior
5 Court granted final approval of the \$8.2 million settlement on
6 May 7, 2021.
- 7 u. *Chandler v. International Marine and Industrial Applicators,
8 LLC.*—Filed in 2022 on behalf of welders who alleged overtime
9 violations. In June 2023, the Western District of Washington
10 granted final approval of a settlement of \$2.5 million.
- 11 v. *Freitas v. Heartland Express*—Filed in November 2019 on behalf
12 of truck drivers who alleged they were not paid for sleeper
13 berth time and failed to receive proper rest and meal breaks. In
14 July 2023, the San Bernardino County Superior Court granted
15 final approval of a settlement of \$10.25 million.
- 16 w. *Keller v. Yakima Valley Memorial Hospital Association, d/b/a
17 Virginia Mason Medical Center*—Filed in 2020 on behalf of
18 hospital employees who alleged they were not paid for time
19 spent donning and doffing surgical attire. In August 2022, the
20 Yakima County Superior Court granted final approval of a
21 settlement of \$500,000.
- 22 x. *Kurtz v. RCCH Trios Health*—Filed in April 2019 on behalf of
23 healthcare workers who alleged they were not provided with
24 rest and meal breaks. In August 2024, the Eastern District of
25 Washington granted final approval of a settlement of \$4.4
26 million.
- 27 y. *Randall v. Integrated Communication Service, Inc.*—Filed in July
2020 on behalf of cable installation technicians who alleged
they were not paid for all hours worked or reimbursed for work-
related expenses. In March 2024, the Western District of
Washington granted final approval of a settlement of \$2.2
million.
- z. *Sampson v. Knight Transportation*—Filed in October 2016 on
behalf of current and former drivers at Knight Transportation
who alleged wage and hour violations, including not receiving
pay for all hours work, unlawful deductions, and not receiving
all earned rest and meal breaks. In April 2023, the Western

1 District of Washington granted final approval of a settlement of
2 \$450,000.

3 12. Examples of consumer protection class and collective actions that Terrell
4 Marshall is litigating or has litigated to successful completion include:

- 5 a. *Jammeh et al. v. HNN Associates LLC, et al.*—Filed in 2019 on
6 behalf of low-income tenants who alleged a large landlord
7 improperly retained their security deposits and a debt collector
8 collected impermissible interest on their accounts. The Western
9 District of Washington certified a litigation class and denied
10 defense motions for summary judgment. The court granted final
11 approval of a \$1.6 million settlement on June 9, 2021. The
12 settlement also required the debt collector to correct credit
13 reporting, enter partial satisfactions of judgment, and cease
14 collecting interest on class member accounts.
- 15 b. *Marical, et al. v. BECU*—Filed in 2019 on behalf of account
16 holders charged them excessive overdraft fees. The King County
17 Superior Court granted final approval of \$6 million settlement
18 on September 27, 2021.
- 19 c. *Gold, et al. v. Lumber Liquidators, Inc.*—Filed in 2014 on behalf
20 of a class of consumers who purchased defective flooring. The
21 Northern District of California granted final approval of the
22 settlement, valued at up to \$30 million, on October 22, 2020.
- 23 d. *Van Fleet v. Trion Worlds, Inc.*—Filed in 2015 on behalf of a
24 nationwide class of online video game players deprived of a
25 promised discount on purchases of virtual goods and
26 who participated in an alleged illegal lottery. The San Mateo
27 County Superior Court granted final approval of a \$420,000
settlement on June 1, 2020.
- e. *Wornicki v. BrokerPriceOpinion.com*—Filed in 2013 on behalf of
a nationwide class of people who provided home valuations,
known as broker price opinions, but who were not paid for the
opinions as promised. The District of Colorado granted final
approval of a settlement of more than \$1.5 million on
September 20, 2018.

- 1 f. *Jordan v. Nationstar Mortgage, LLC*—Filed in 2012 on behalf of
2 Washington homeowners who were improperly locked out of
3 their homes by their mortgage lender. The Eastern District of
4 Washington granted final approval of a \$17 million settlement
5 on May 2, 2019.
- 6 g. *Carrillo v. Wells Fargo Bank, N.A.*—Filed in 2018 on behalf of
7 borrowers who allege Wells Fargo charged them interest rates
8 on residential loans that were higher than the rates disclosed in
9 the bank’s buydown agreements and closing disclosures.
10 The Eastern District of New York granted final approval of a \$6.9
11 million settlement on August 19, 2021.
- 12 h. *Paredes Garcia v. Harborstone Credit Union*—Filed in 2021 on
13 behalf of consumers who participate in the Deferred
14 Action for Childhood Arrivals program or who otherwise do not
15 hold United States citizenship but reside in the United States.
16 The plaintiff alleges that Harborstone has engaged in a policy
17 and practice of depriving consumers of the right to contract
18 based on their alienage status in violation of 42 U.S.C. § 1981.
19 The plaintiff also alleges that Harborstone has engaged in a
20 policy and practice of obtaining consumer reports on these
21 individuals in violation of the Fair Credit Reporting Act, 15 U.S.C.
22 § 1681b. The parties entered into a settlement agreement on
23 December 19, 2022, that will award damages to hundreds of
24 settlement class members and changed Harborstone’s lending
25 policies. The Western District of Washington granted final
26 approval of the settlement on November 9, 2023.
- 27 i. *Tokarski v. Med-Data, Inc.*—Filed in 2021 on behalf of
individuals affected by a Med-Data data breach, and who were
not advised of the breach in a timely manner. The Southern
District of Texas granted final approval of a \$7,000,000
settlement fund on September 11, 2024.
- j. *Blankenship v. HAPO Community Credit Union*—Filed in 2019 on
behalf of Washington members of HAPO Community Credit
Union who allegedly were charged improper overdraft and NSF
fees. The Benton County Superior Court granted final approval
of the \$4.5 million settlement in January 2022.

13. Additional information about class actions litigated by Terrell Marshall is
available on our website www.terrellmarshall.com.

1 **D. The Prosecution of this Action**

2 14. During the more than three years of litigation leading up to the settlement
3 agreement, the parties briefed two motions to dismiss and a motion for class certification,
4 navigated a removal and remand, exchanged substantial discovery, and engaged in settlement
5 negotiations.

6 15. During the spring and summer of 2024, the parties engaged in written discovery.
7 The parties provided written interrogatory responses and produced documents.

8 16. On January 23, 2025, Plaintiffs served a notice of Rule 30(b)(6) deposition on
9 Defendant Bright Horizons. On February 7, 2025, Defendant served objections to the 30(b)(6)
10 notice. The parties met and conferred regarding the objections.

11 17. Plaintiffs deposed two designated representatives of Defendant Bright Horizons
12 on April 17, 2025.

13 18. Defendant Bright Horizons served deposition notices on Plaintiffs Rutter and
14 Chavez on May 2, 2025.

15 19. Defendant Bright Horizons deposed Plaintiff Chavez on May 23, 2025, and
16 Plaintiff Rutter on May 27, 2025.

17 20. On October 9, 2025, the parties participated in a full-day mediation with the
18 assistance of experienced mediator, Cliff Freed. Mr. Freed has significant experience mediating
19 class actions. More about Mr. Freed and his credentials can be found at
20 <https://usamwa.com/panel-biographies/panel-bios/mr-cliff-freed/>.

21 21. Plaintiffs negotiated the settlement with a solid understanding of the strengths
22 and weaknesses of their case, after investigation, substantial discovery, and rigorous motions
23 practice. Plaintiffs' counsel believe the settlement is fair, reasonable, adequate, and in the best
24 interest of the Settlement Class as a whole.

25 22. At the mediation, the parties reached an agreement in principle to settle the
26 case. Over the following months, the parties negotiated the terms of the settlement. On
27 February 5, 2026, the parties executed the Settlement Agreement.

1 23. Plaintiffs Chelsea Rutter and Magdalena Chavez, both former employees of
2 Washington Bright Horizons locations, assisted Plaintiffs' counsel with their investigation of the
3 facts of this case and with the ongoing litigation. Ms. Rutter provided factual information
4 included in the complaint, helped counsel respond to discovery, discussed settlement proposals
5 with Class Counsel and approved the Settlement, and attended the full-day mediation in
6 October 2025. Ms. Rutter and Ms. Chavez were both deposed and prepared to testify at trial.
7 They have been, and continue to be, willing to step forward and represent the proposed class
8 members' interests.

9 24. Since the beginning of this case, Terrell Marshall has worked with no guarantee
10 of being compensated for its time and efforts. Payment of Terrell Marshall's fees has always
11 been contingent on successfully obtaining relief for the Class Representatives and Class
12 Members. As a result, there was a substantial risk of non-payment, particularly in light of the
13 challenges inherent in this type of case. Work on this case has necessarily been to the exclusion
14 of work on other matters that likely would have generated fees. Terrell Marshall has also been
15 denied use of the fees it earned over the course of this case.

16 25. Attached as **Exhibit A** are contemporaneous time reports reflecting the work of
17 Terrell Marshall's attorneys and staff on this matter. These records are prepared and
18 maintained by Terrell Marshall in the regular course of business.

19 26. The work performed by paralegals and legal assistants was work that I or an
20 attorney would have had to perform absent such assistance. In the case of Heather Brown and
21 Laura Murray, the work required an understanding of the facts and claims at issue in the case
22 and was important to the development of those facts and claims. The work of Holly Rota and
23 Krystal Brown required an understanding of relevant legal rules and concepts. All staff members
24 are qualified to perform substantive legal work based on their training and past experience
25 working for attorneys.

26 27. The following table identifies the attorneys and staff members from Terrell
27 Marshall who worked on this case and for whom the recovery of fees is sought. For each of the

1 timekeepers below I have stated the current hourly rate, the number of hours worked through
 2 April 21, 2026, and the total amount of fees. These summaries are taken from
 3 contemporaneous, daily time reports prepared and maintained by Terrell Marshall in the
 4 regular course of business, attached as Exhibit A.

NAME AND POSITION	RATE/PRICE	HOURS BILLED/UNITS	TOTAL/VALUE
ATTORNEYS			
Beth E. Terrell Founding Member J.D. from Univ. of California, Davis School of Law, 1995	\$700	5.9	\$4,130.00
Toby J. Marshall Founding Member J.D. from Univ. of Washington School of Law, 2002	\$700	56.6	\$39,620.00
Amanda M. Steiner Member J.D. from Univ. of California, Berkeley School of Law, 1997	\$675	7.2	\$4,860.00
Blythe D. Chandler Member J.D. from Univ. of Washington School of Law, 2010	\$600	14.5	\$8,700.00
Elizabeth A. Adams Member J.D. from UCLA School of Law, 2012	\$550	242	\$133,100.00
Eden Nordby Associate J.D. from Univ. of Washington School of Law, 2021	\$500	1	\$500.00

1	NAME AND POSITION	RATE/PRICE	HOURS BILLED/UNITS	TOTAL/VALUE
2	Eleanor Eagen Associate	\$325	11.3	\$3,672.50
3	J.D. from Univ. of Washington School of			
4	Law, 2025			
5	Elizabeth Schatz Cordero	\$350	90.6	\$31,710.00
6	Associate			
7	J.D. from Univ. of California Irvine School			
8	of Law, 2023			
9	Seth Dawson Associate	\$400	8.4	\$3,360.00
10	J.D. from Univ. of Washington School of			
11	Law, 2019			
12	LAW CLERKS			
13	Patrick Mahoney	\$200	2	\$400.00
14	Madison Brown	\$200	2.3	\$460.00
15	PARALEGALS/LEGAL ASSISTANTS			
16	Heather Brown Paralegal	\$260	16.2	\$4,212.00
17	23 years legal experience			
18	Holly Rota Legal Assistant	\$200	20.2	\$4,040.00
19	21 years legal experience			
20	Krystal Brown Legal Assistant	\$200	2.5	\$500.00
21	15 years of legal experience			
22	Laura Murray Paralegal	\$210	0.5	\$105.00
23	4 years of legal experience			
24	TOTAL:		481.2	239,369.50

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DECLARATION OF TOBY J. MARSHALL IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS AND
SERVICE AWARDS - 15
Case No. 22-2-19810-9 SEA

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1 28. I anticipate the firm will incur additional fees in relation to the approval and
2 settlement administration process. I will work with the settlement administrator to ensure that
3 Plaintiffs' Motion for Attorneys' Fees, Costs, and Service Awards and all supporting records
4 including this declaration are posted on the settlement website within 24 hours of filing it with
5 the Court.

6 29. The lodestar calculations of Class Counsel are based on reasonable hourly rates.
7 Class Counsel set their rates for attorneys and staff members based on a variety of factors,
8 including among others: the experience, skill and sophistication required for the types of legal
9 services typically performed; the rates customarily charged in the markets where legal services
10 are typically performed; and the experience, reputation and ability of the attorneys and staff
11 members.

12 30. Terrell Marshall has incurred out-of-pocket litigation expenses totaling
13 \$13,724.67, primarily to cover expenses related to legal research; investigation; filing and
14 service fees; administrative costs such as copying, mailing, and messenger expenses; and court
15 reporter, expert, transcription, and mediation fees. The following chart summarizes Terrell
16 Marshall's litigation costs:

Category of Expense	Total
Service	\$98.82
Court Reporter	\$300.00
Expert	\$6,000.00
Filing Fees	\$1,230.37
Mediation	\$4,225.00
Parking	\$15.00
Transcripts	\$1,752.30

Category of Expense	Total
Legal Research	\$103.18
TOTAL	\$13,724.67

31. The estimated Settlement Administrator expenses are \$21,294. Final expense accounting will be provided to the Court in the motion for final approval.

32. Attached hereto as **Exhibit B** is the Order Granting Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement and Award of Attorneys' Fees, Costs and Service Award in *Strong v. Numerica Credit Union*, No. 17-2-01406-39 (Yakima Cnty. Sup. Ct. Feb. 14, 2020) (awarding one-third of fund in fees and costs)).

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

EXECUTED at Seattle, Washington and DATED this 18th day of May, 2026.

By: /s/ Toby J. Marshall, WSBA #32726
Toby J. Marshall, WSBA #32726

1 **DECLARATION OF SERVICE**

2 I, Toby J. Marshall, hereby certify that on May 18, 2026, I caused true and correct copies
3 of the foregoing to be served via the means indicated below:

4 Derek Bishop, WSBA #39363

5 Email: debishop@littler.com

6 Laura Davis, WSBA #52035

7 Email: ladavis@littler.com

8 Email: KFiumano@littler.com

LITTLER MENDELSON, P.C.

9 One Union Square

600 University Street, Suite 3200

10 Seattle, Washington 98101

11 Telephone: (206) 623-3300

Facsimile: (206) 447-6965

- U.S. Mail, postage prepaid
- Hand Delivered via Messenger Service
- Overnight Courier
- Facsimile
- Electronic Mail
- King County Electronic Filing System

12 *Attorneys for Defendant*

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

15 DATED this 18th day of May, 2026.

16
17 By: /s/ Toby J. Marshall, WSBA #32726

Toby J. Marshall, WSBA #32726

- Exhibit A -

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
2/16/2022	ELN	Video conference regarding factual background, legal theories, and case strategy [1].	1	\$ 500.00	\$ 500.00
3/22/2022	TJM	Reviewed materials regarding factual background and legal claims [.2]; video conference with co-counsel regarding same [.5]; opened new matter and ran conflict check [1.1].	0.8	\$ 700.00	\$ 560.00
3/22/2022	EAA	Telephone call regarding potential plaintiffs and next steps [.5].	0.5	\$ 550.00	\$ 275.00
3/23/2022	EAA	Worked on research regarding Washington noncompete claims.	0.4	\$ 550.00	\$ 220.00
4/6/2022	EAA	Emailed copy of sample complaint to co-counsel.	0.2	\$ 550.00	\$ 110.00
5/18/2022	EAA	Strategy call with co counsel [.5].	0.5	\$ 550.00	\$ 275.00
5/25/2022	EAA	Email correspondence regarding draft complaint.	0.2	\$ 550.00	\$ 110.00
5/26/2022	EAA	Reviewed and provided feedback on first draft of complaint [1.6]; worked on searching for potential family plaintiffs [0.3].	1.9	\$ 550.00	\$ 1,045.00
5/31/2022	EAA	Reviewed and analyzed co-counsel's comments on draft complaint [0.3]; email correspondence to schedule follow-up	0.4	\$ 550.00	\$ 220.00
6/2/2022	EAA	Team conference call regarding case strategy and next steps.	0.5	\$ 550.00	\$ 275.00
6/9/2022	EAA	Email correspondence regarding rescheduling meeting and task	0.6	\$ 550.00	\$ 330.00
6/21/2022	TJM	Analyzed issues regarding case strategy [1.1].	0.1	\$ 700.00	\$ 70.00
6/21/2022	EAA	Email correspondence regarding call scheduling [0.2]; researched and analyzed potential legal claims [0.2].	0.4	\$ 550.00	\$ 220.00
6/28/2022	EAA	Email correspondence regarding scheduling team call.	0.2	\$ 550.00	\$ 110.00
6/30/2022	TJM	Worked on draft complaint and researched and analyzed issues regarding same [.4]; video conference with co-counsel regarding same and case strategy issues [.7].	1.1	\$ 700.00	\$ 770.00
6/30/2022	EAA	Reviewed draft complaint [0.2]; team call regarding case	0.9	\$ 550.00	\$ 495.00
6/30/2022	BET	Team call regarding draft complaint and case strategy [.7].	0.7	\$ 700.00	\$ 490.00
6/30/2022	BHC	Meeting with co-counsel regarding potential claims against (BRIGHT HORIZONS) [.7].	0.7	\$ 600.00	\$ 420.00
7/11/2022	TJM	Worked on draft complaint [8].	0.8	\$ 700.00	\$ 560.00
7/13/2022	BHC	Worked on complaint [6].	0.6	\$ 600.00	\$ 360.00
7/14/2022	EAA	Reviewed edits and comments to draft complaint and proposed additional revisions.	0.5	\$ 550.00	\$ 275.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
7/21/2022	TJM	Worked on case management issues [0.1].	0.1	\$ 700.00	\$ 70.00
7/25/2022	TJM	Worked on joint prosecution agreement and email correspondence with co-counsel regarding same [0.3]; worked	0.4	\$ 700.00	\$ 280.00
8/24/2022	EAA	Reviewed and revised draft complaint [0.8]; telephone conference with Ms. Rutter and co-counsel regarding complaint, strategy, and next steps [0.5].	1.3	\$ 550.00	\$ 715.00
9/21/2022	EAA	Email correspondence regarding next steps [0.2].	0.2	\$ 550.00	\$ 110.00
11/9/2022	EAA	Email correspondence regarding press and filing plans [0.2]; reviewed complaint and talking points in preparation for call with reporter [0.4]; telephone call with client and reporter	1.5	\$ 550.00	\$ 825.00
11/14/2022	EAA	Email correspondence regarding final details for filing [0.2].	0.2	\$ 550.00	\$ 110.00
11/15/2022	TJM	Analyzed issues regarding anticipated filing of complaint and case management [0.1].	0.1	\$ 700.00	\$ 70.00
11/15/2022	EAA	Email correspondence regarding complaint filing details [0.2].	0.2	\$ 550.00	\$ 110.00
11/21/2022	EAA	Email correspondence regarding filing date [0.2].	0.2	\$ 550.00	\$ 110.00
11/29/2022	EAA	Proofread complaint and reviewed formatting issues [0.8]; reviewed and edited press release [0.4].	1.2	\$ 550.00	\$ 660.00
11/30/2022	EAA	Reviewed final draft of complaint and email correspondence regarding filing details [0.9].	0.9	\$ 550.00	\$ 495.00
12/1/2022	EAA	Email correspondence regarding filing complaint and press strategy [0.6].	0.6	\$ 550.00	\$ 330.00
12/2/2022	TJM	Analyzed issues regarding media inquiries [0.1].	0.1	\$ 700.00	\$ 70.00
12/5/2022	EAA	Email correspondence regarding publicity [0.3].	0.3	\$ 550.00	\$ 165.00
12/6/2022	EAA	Email correspondence regarding publicity [0.2]; research regarding service deadline [0.2].	0.4	\$ 550.00	\$ 220.00
12/7/2022	HMR	Worked on and finalized letter to Attorney General's office enclosing copy of complaint [0.2].	0.2	\$ 200.00	\$ 40.00
12/7/2022	EAA	Drafted discovery requests [0.8]; worked on edits to blog post regarding case [0.2].	1	\$ 550.00	\$ 550.00
12/8/2022	EAA	Email correspondence regarding publicity [0.2].	0.2	\$ 550.00	\$ 110.00
12/13/2022	EAA	Worked on edits to blog post [0.2].	0.2	\$ 550.00	\$ 110.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
12/14/2022	EAA	Telephone conference with new potential plaintiff [0.9]; follow-up email regarding same [0.1].	1	\$ 550.00	\$ 550.00
12/29/2022	EAA	Email correspondence with client [0.3].	0.3	\$ 550.00	\$ 165.00
1/3/2023	EAA	Email correspondence regarding scheduling team call [0.1].	0.1	\$ 550.00	\$ 55.00
1/4/2023	EAA	Telephone conference with co-counsel and client regarding case status and next steps [0.5].	0.5	\$ 550.00	\$ 275.00
1/12/2023	EAA	Email correspondence regarding case status [0.2].	0.2	\$ 550.00	\$ 110.00
1/17/2023	EAA	Reviewed email correspondence regarding media inquiry [0.2].	0.2	\$ 550.00	\$ 110.00
1/26/2023	EAA	Reviewed and edited discovery requests and email correspondence regarding service of complaint and discovery	0.5	\$ 550.00	\$ 275.00
2/22/2023	TJM	Analyzed issues regarding removal and appearance of counsel	0.1	\$ 700.00	\$ 70.00
2/22/2023	EAA	Email correspondence regarding removal [0.3].	0.3	\$ 550.00	\$ 165.00
2/27/2023	EAA	Email correspondence regarding meet and confer on motion to dismiss [0.5].	0.5	\$ 550.00	\$ 275.00
2/28/2023	EAA	Preparation for meet and confer on motion to dismiss [0.6]; meet and confer call regarding motion to dismiss [.2]; follow up email regarding call [0.2]; reviewed motion to dismiss [0.3].	1.3	\$ 550.00	\$ 715.00
3/1/2023	EAA	Email correspondence with clients and co-counsel regarding case status [0.2].	0.2	\$ 550.00	\$ 110.00
3/6/2023	EAA	Email correspondence with co-counsel [0.2].	0.2	\$ 550.00	\$ 110.00
3/7/2023	TJM	Telephone conference with co-counsel regarding plan for responding to motion to dismiss [0.8].	0.8	\$ 700.00	\$ 560.00
3/7/2023	EAA	Videoconference with co-counsel regarding response to motion to dismiss and other case issues [0.8].	0.8	\$ 550.00	\$ 440.00
3/8/2023	EAA	Worked on research and drafting response to motion to dismiss	6	\$ 550.00	\$ 3,300.00
3/13/2023	EAA	Email correspondence regarding renoting motion to dismiss and scheduling 26(f) conference [0.4].	0.4	\$ 550.00	\$ 220.00
3/14/2023	EAA	Email correspondence regarding pro hac vices and scheduling 26(f) [0.2].	0.2	\$ 550.00	\$ 110.00
3/20/2023	EAA	Email correspondence scheduling 26(f) conference [0.4]; drafted joint status report [1.9]; prepared outline for 26(f)	2.8	\$ 550.00	\$ 1,540.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
3/21/2023	EAA	Prep for 26(f) conference [0.4]; worked on response to motion to dismiss [3.8]; participated in 26(f) conference [.3]; email follow-up to 26(f) conference [0.2]; updated and re-served	5	\$ 550.00	\$ 2,750.00
3/22/2023	EAA	Worked on drafting response to motion to dismiss [3.0].	3	\$ 550.00	\$ 1,650.00
3/23/2023	EAA	Worked on drafting response to motion to dismiss [4.0].	4	\$ 550.00	\$ 2,200.00
3/27/2023	EAA	Calls and emails regarding extension of time for response to motion to dismiss [0.4].	0.4	\$ 550.00	\$ 220.00
3/28/2023	BHC	Telephone call with Ms. Adams regarding taking over and completing response to motion to dismiss [.4].	0.4	\$ 600.00	\$ 240.00
3/28/2023	EAA	Telephone call regarding response to motion to dismiss [0.4].	0.4	\$ 550.00	\$ 220.00
3/29/2023	BHC	Worked on response to motion to dismiss [7].	7	\$ 600.00	\$ 4,200.00
3/30/2023	BHC	Worked on response to motion to dismiss [3.8]	3.8	\$ 600.00	\$ 2,280.00
3/30/2023	BHC	Revised response to motion to dismiss; sent same to co-counsel	1.4	\$ 600.00	\$ 840.00
4/2/2023	TJM	Worked on response to motion to dismiss [1.0].	1	\$ 700.00	\$ 700.00
4/3/2023	BHC	Reviewed final version of response to motion dismiss before	0.4	\$ 600.00	\$ 240.00
4/3/2023	EAA	Reviewed email correspondence regarding response to motion to dismiss [0.2]; worked on edits to same [1.2]; approved final of same for filing [0.2]; drafted initial disclosures and email to Ms. Rutter regarding same [0.4].	2	\$ 550.00	\$ 1,100.00
4/5/2023	EAA	Email correspondence with plaintiff and co-counsel regarding initial disclosures [0.4].	0.4	\$ 550.00	\$ 220.00
4/6/2023	TJM	Worked on initial disclosures [.2]	0.2	\$ 700.00	\$ 140.00
4/6/2023	EAA	Completed draft of initial disclosures and edited and served same [1.5]; reviewed defendant's initial disclosures [0.2].	1.7	\$ 550.00	\$ 935.00
4/7/2023	EAA	Meeting with co counsel to discuss defendant reply brief [.5].	0.5	\$ 550.00	\$ 275.00
4/10/2023	EAA	Emails regarding pro hac vice applications [0.2]; reviewed and analyzed reply in support of motion to dismiss [0.3].	0.5	\$ 550.00	\$ 275.00
4/11/2023	EAA	Email correspondence regarding pro hac vices [0.4].	0.4	\$ 550.00	\$ 220.00
4/17/2023	EAA	Email correspondence regarding joint status report and discovery stay request [0.3].	0.3	\$ 550.00	\$ 165.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
4/18/2023	EAA	Email correspondence regarding joint status report and discovery extension request [0.6].	0.6	\$ 550.00	\$ 330.00
4/19/2023	EAA	Worked on edits to joint status report [0.6].	0.6	\$ 550.00	\$ 330.00
4/20/2023	EAA	Email correspondence regarding pro hac vice applications of co-counsel [0.2]; reviewed and approved final joint status report	0.5	\$ 550.00	\$ 275.00
5/4/2023	EAA	Reviewed defendant's responses to plaintiff's first set of discovery requests [0.2].	0.2	\$ 550.00	\$ 110.00
5/9/2023	EAA	Email correspondence regarding potential client family [0.2].	0.2	\$ 550.00	\$ 110.00
6/20/2023	EAA	Reviewed scheduling order and scheduled team meeting regarding next steps [0.2].	0.2	\$ 550.00	\$ 110.00
6/26/2023	EAA	Reviewed scheduling order [0.2]; prepared for and participated in videoconference with co-counsel [0.4]; drafted email regarding conflicts with trial date [0.2].	0.8	\$ 550.00	\$ 440.00
7/17/2023	TJM	Analyzed issues regarding delay in discovery and impact on class certification schedule [.1].	0.1	\$ 700.00	\$ 70.00
7/17/2023	EAA	Email correspondence regarding case status [0.2]; personal conference regarding extending deadlines [0.1].	0.3	\$ 550.00	\$ 165.00
7/18/2023	EAA	Email correspondence regarding stipulation to extend deadlines	0.4	\$ 550.00	\$ 220.00
7/20/2023	EAA	Drafted stipulated motion to extend deadlines [0.7]; follow-up email correspondence regarding same [0.3].	1	\$ 550.00	\$ 550.00
7/24/2023	EAA	Reviewed and approved stipulated motion for filing [0.3]; reviewed order granting stipulated motion [0.1].	0.4	\$ 550.00	\$ 220.00
8/21/2023	EAA	Email correspondence regarding discovery requests [0.2].	0.2	\$ 550.00	\$ 110.00
11/7/2023	EAA	Email correspondence with Ms. Rutter regarding case status	0.2	\$ 550.00	\$ 110.00
12/4/2023	EAA	Email correspondence regarding scheduling oral argument on motion to dismiss [0.2].	0.2	\$ 550.00	\$ 110.00
12/5/2023	EAA	Email correspondence regarding oral argument logistics and scheduling [0.2].	0.2	\$ 550.00	\$ 110.00
12/6/2023	EAA	Reviewed briefing on motion to dismiss [0.5].	0.5	\$ 550.00	\$ 275.00
12/7/2023	EAA	Email correspondence regarding scheduling oral argument on motion to dismiss [0.3].	0.3	\$ 550.00	\$ 165.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
12/11/2023	EAA	Reviewed emails and order setting oral argument on motion to dismiss [0.1].	0.1	\$ 550.00	\$ 55.00
12/18/2023	TJM	Reviewed court's order regarding chambers procedures and worked on case management issues [1.1].	0.1	\$ 700.00	\$ 70.00
12/18/2023	EAA	Reviewed order regarding chambers procedures [0.2].	0.2	\$ 550.00	\$ 110.00
12/19/2023	EAA	Email correspondence scheduling moot argument on motion to dismiss [0.4].	0.4	\$ 550.00	\$ 220.00
12/20/2023	SD	Review complaint and briefing in support of motion to dismiss [1.1]; Outline potential questions for moot [0.4].	1.5	\$ 400.00	\$ 600.00
1/2/2024	EAA	Preparation for oral argument on motion to dismiss [0.5].	0.5	\$ 550.00	\$ 275.00
1/3/2024	TJM	Analyzed issues regarding upcoming argument on motion to dismiss [1.1].	0.1	\$ 700.00	\$ 70.00
1/3/2024	EAA	Worked on logistics for hearing on motion to dismiss [0.2]; reviewed briefing in preparation for moot argument [1.2].	1.4	\$ 550.00	\$ 770.00
1/4/2024	EAA	Preparation for moot argument [1.5]; participated in moot argument [1.5].	3	\$ 550.00	\$ 1,650.00
1/4/2024	SD	Prepared for moot argument [1.7]; Participated in moot	3.2	\$ 400.00	\$ 1,280.00
1/8/2024	EAA	Email correspondence regarding hearing logistics [0.2]; prepared for hearing on motion to dismiss [1.0].	1.2	\$ 550.00	\$ 660.00
1/9/2024	EAA	Traveled to and attended hearing on motion to dismiss [4.0]; reviewed briefing in preparation for same [1.0]; drafted email to co-counsel with debrief of hearing [0.4].	5.4	\$ 550.00	\$ 2,970.00
1/25/2024	TJM	Reviewed court's order denying motion to dismiss and remanding case [1.1].	0.1	\$ 700.00	\$ 70.00
1/25/2024	EAA	Reviewed order remanding case to state court [0.2]; email correspondence regarding same [0.2].	0.4	\$ 550.00	\$ 220.00
1/30/2024	KB	Contacted assistants for mediators Hicks and Watness to obtain availability in February and March [4]. Obtained availability for Hicks and Watness [1.2].	0.6	\$ 200.00	\$ 120.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
2/7/2024	EAA	Email correspondence regarding opposing counsel's questions regarding amendment or appeal of court's order on motion to dismiss [0.6].	0.6	\$ 550.00	\$ 330.00
2/12/2024	HMR	Worked on and finalized plaintiff's first set of interrogatories and requests for production of documents directed to	0.4	\$ 200.00	\$ 80.00
2/12/2024	EAA	Reviewed remand order [0.2]; reviewed and re-served discovery requests [0.3].	0.5	\$ 550.00	\$ 275.00
2/15/2024	EAA	Reviewed rules regarding remand and opposing counsel's email regarding same [0.5].	0.5	\$ 550.00	\$ 275.00
2/21/2024	EAA	Email correspondence regarding research question relating to service of discovery requests upon remand [0.3].	0.3	\$ 550.00	\$ 165.00
2/21/2024	MB	Researched discovery issue [2.2], personal correspondence regarding the same [.1].	2.3	\$ 200.00	\$ 460.00
3/4/2024	EAA	Email correspondence regarding hearing date for motion to dismiss [0.3].	0.3	\$ 550.00	\$ 165.00
3/5/2024	EAA	Email correspondence regarding setting hearing on motion to dismiss [0.3].	0.3	\$ 550.00	\$ 165.00
3/11/2024	EAA	Email correspondence regarding scheduling issues [0.3].	0.3	\$ 550.00	\$ 165.00
3/14/2024	EAA	Met with co counsel regarding scheduling issues [.2]; reviewed and edited stipulated motion regarding case schedule [0.3].	0.5	\$ 550.00	\$ 275.00
4/1/2024	EAA	Reviewed and analyzed motion to dismiss [0.5]; drafted email to co-counsel regarding same [0.4]; researched amendments to noncompete statute [0.5].	1.4	\$ 550.00	\$ 770.00
4/2/2024	HMR	Worked on plaintiff's response to defendant's motion to dismiss, declaration supporting same, and proposed order	0.4	\$ 200.00	\$ 80.00
4/3/2024	EAA	Worked on drafting response to motion to dismiss [1.5].	1.5	\$ 550.00	\$ 825.00
4/8/2024	EAA	Drafted email regarding questions relating to recent amendments to noncompetition law [0.2]; worked on drafting response to motion to dismiss [1.7].	1.9	\$ 550.00	\$ 1,045.00
4/9/2024	EAA	Worked on drafting response to motion to dismiss [1.4].	1.4	\$ 550.00	\$ 770.00
4/10/2024	EAA	Completed draft of response to motion to dismiss [1.8].	1.8	\$ 550.00	\$ 990.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
4/15/2024	TJM	Worked on response to motion to dismiss [.5].	0.5	\$ 700.00	\$ 350.00
4/15/2024	HMR	Worked on and finalized plaintiff's response to defendant's motion to dismiss, declaration supporting same, and proposed order granting same; electronically filed same; submitted	1.5	\$ 200.00	\$ 300.00
4/15/2024	EAA	Worked on edits to response to motion to dismiss and approved finals for filing of same [3.1]; telephone call with co-counsel regarding same [0.2].	3.3	\$ 550.00	\$ 1,815.00
4/16/2024	HMR	Worked on motion for limited admission to appear pro hac vice for Valerie Collins, proposed order, note for motion and WSBA cover sheet. [.4]	0.4	\$ 200.00	\$ 80.00
4/16/2024	EAA	Email correspondence regarding oral argument prep and pro hac vice application [0.5]; worked on issues relating to pro hac vice motion for Valerie Collins [0.5].	1	\$ 550.00	\$ 550.00
4/17/2024	EAA	Email correspondence regarding working copies, Zoom hearing, and pro hac vice application [1.1].	1.1	\$ 550.00	\$ 605.00
4/17/2024	HMR	Worked on and finalized application for limited admission pro hac vice of Valerie Collins, proposed order, note for motion, and WSBA cover sheet; electronically filed same; submitted judges' working copies of same; and coordinated mailing for	1	\$ 200.00	\$ 200.00
4/22/2024	EAA	Reviewed order denying pro hac vice application and email correspondence regarding same [0.5]; skimmed reply in support of motion to dismiss [0.2].	0.7	\$ 550.00	\$ 385.00
4/23/2024	HMR	Worked on and finalized application for limited admission pro hac vice of Valerie Collins, note for motion, proposed order; electronically filed same; submitted judges working copies of	0.4	\$ 200.00	\$ 80.00
4/23/2024	EAA	Reviewed and approved updated pro hac vice application [0.4].	0.4	\$ 550.00	\$ 220.00
4/24/2024	EAA	Reviewed motion to dismiss briefing in preparation for moot argument [0.5]; participated in moot argument [1.2].	1.7	\$ 550.00	\$ 935.00
4/25/2024	EAA	Emails and personal conference regarding Ms. Collins' pro hac vice application [0.3].	0.8	\$ 550.00	\$ 440.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
4/26/2024	HMR	Submitted WSBA application of Valerie Collins through online portal and submitted fee for same. [.3]	0.3	\$ 200.00	\$ 60.00
4/26/2024	EAA	Prepared for and attended hearing on motion to dismiss [1.5]; telephone call with co-counsel debriefing same [0.2]; emails regarding same [0.2].	1.9	\$ 550.00	\$ 1,045.00
4/29/2024	EAA	Exchanged emails scheduling time to talk with co-counsel regarding ruling on motion to dismiss and next steps [0.2].	0.2	\$ 550.00	\$ 110.00
4/30/2024	EAA	Telephone conference with co-counsel regarding ruling on motion to dismiss and potential next steps and strategy [.5]; reviewed and analyzed amendments to noncompete statute to determine whether and when to file amended complaint [0.3].	0.8	\$ 550.00	\$ 440.00
4/30/2024	TJM	Video conference with co-counsel regarding case strategy	0.5	\$ 700.00	\$ 350.00
5/1/2024	EAA	Drafted correspondence regarding proposed order on motion to dismiss and re-serving discovery requests [0.3].	0.3	\$ 550.00	\$ 165.00
5/1/2024	HMR	Worked on and finalized plaintiff's first set of interrogatories and requests for production of documents. [.3]	0.3	\$ 200.00	\$ 60.00
5/6/2024	EAA	Reviewed and edited draft proposed order on motion to	0.3	\$ 550.00	\$ 165.00
5/7/2024	EAA	Made further edits to proposed order on motion to dismiss and returned same to opposing counsel for submission [0.2].	0.2	\$ 550.00	\$ 110.00
5/9/2024	EAA	Followed up with opposing counsel regarding submission of proposed order on motion to dismiss [0.4].	0.4	\$ 550.00	\$ 220.00
5/29/2024	EAA	Personal conference regarding amendments to noncompete statute [0.2].	0.2	\$ 550.00	\$ 110.00
5/30/2024	EAA	Email correspondence regarding extension to discovery response deadline [0.1]; telephone call regarding strategy for amended complaint [0.2].	0.3	\$ 550.00	\$ 165.00
6/3/2024	EAA	Analyzed current case status and drafted email summarizing same [0.4].	0.4	\$ 550.00	\$ 220.00
6/10/2024	TJM	Worked on case strategy issues [.2].	0.2	\$ 700.00	\$ 140.00
6/10/2024	EAA	Email correspondence regarding discovery requests, protective order, and next steps [0.1].	0.1	\$ 550.00	\$ 55.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
6/11/2024	KB	Updated caption form to reflect change in defense counsel attorneys [.1].	0.1	\$ 200.00	\$ 20.00
6/11/2024	EE	Researched legal issues regarding amendment to noncompete statute [.1.6].	1.6	\$ 325.00	\$ 520.00
6/11/2024	EAA	Drafted email summarizing research project regarding noncompete cases research and retroactivity issues [0.4].	0.4	\$ 550.00	\$ 220.00
6/12/2024	TJM	Prepared for team meeting regarding case strategy issues and plan for amending complaint and responding to discovery requests [.1]; participated in same [.6].	0.7	\$ 700.00	\$ 490.00
6/12/2024	EE	Researched and analyzed legal issues regarding amendments to noncompete statute [.7].	7	\$ 325.00	\$ 2,275.00
6/12/2024	EE	Videoconference with co-counsel to discuss potential amendment to complaint [1].	1	\$ 325.00	\$ 325.00
6/12/2024	EAA	Personal conference regarding research questions [0.3]; videoconference with co-counsel regarding next steps and discovery [1]; reviewed and edited proposed stipulated protective order [0.4]; worked on other follow-up from team	2.3	\$ 550.00	\$ 1,265.00
6/13/2024	EE	Researched and analyzed legal issues regarding amendments to noncompete statute [.1.7].	1.7	\$ 325.00	\$ 552.50
6/13/2024	EAA	Reviewed and analyzed results of research regarding retroactivity issue [0.2]; worked on drafting amended	1.3	\$ 550.00	\$ 715.00
6/17/2024	EAA	Worked on final edits to stipulated protective order and sent back to opposing counsel [0.3]; reviewed defendant's written responses to plaintiff's first set of discovery requests [0.2].	0.5	\$ 550.00	\$ 275.00
6/24/2024	EAA	Email follow-up regarding status of protective order [0.1].	0.1	\$ 550.00	\$ 55.00
6/25/2024	TJM	Worked on case management issues [.1].	0.1	\$ 700.00	\$ 70.00
7/10/2024	EAA	Reviewed edits to stipulated protective order and agreed to final version for filing [0.5]; email correspondence regarding extension to deadline for discovery responses [0.2].	0.7	\$ 550.00	\$ 385.00
7/17/2024	TJM	Worked on case strategy issues [.1].	0.1	\$ 700.00	\$ 70.00
7/17/2024	HB	Processed defendant's document production [1.0].	1	\$ 260.00	\$ 260.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
7/17/2024	HMR	Worked on meet and confer letter. [0.3]	0.3	\$ 200.00	\$ 60.00
7/17/2024	EAA	Reviewed document production [1.1]; worked on drafting meet and confer letter [2.2].	3.3	\$ 550.00	\$ 1,815.00
7/18/2024	EAA	Worked on reviewing discovery responses and drafting meet and confer letter [2.3].	2.3	\$ 550.00	\$ 1,265.00
7/22/2024	HMR	Worked on and finalized plaintiff's objections and responses to defendant's first set of interrogatories and requests for production of documents; emailed same to counsel for all	0.7	\$ 200.00	\$ 140.00
7/22/2024	EAA	Reviewed and edited plaintiff's discovery responses [0.4]; reviewed and approved final discovery responses for service [0.5]; worked on drafting meet and confer letter [0.6].	1.5	\$ 550.00	\$ 825.00
7/23/2024	EAA	Completed draft of meet and confer letter [1.5].	1.5	\$ 550.00	\$ 825.00
7/24/2024	EAA	Email correspondence regarding status of amended complaint, potential new plaintiff, and pro hac vice status [0.4]; reviewed edits to meet and confer letter and made final revisions to same [0.4]; reviewed and served final meet and confer letter	1.1	\$ 550.00	\$ 605.00
7/24/2024	HMR	Worked on and finalized letter to defendant regarding meet and confer. [0.4]	0.4	\$ 200.00	\$ 80.00
7/25/2024	EAA	Email correspondence regarding adding plaintiff [0.3].	0.3	\$ 550.00	\$ 165.00
7/29/2024	TJM	Analyzed issues regarding factual background development and case strategy [0.2].	0.2	\$ 700.00	\$ 140.00
7/29/2024	EAA	Email correspondence regarding amended complaint and collecting plaintiff's documents for production [0.2].	0.2	\$ 550.00	\$ 110.00
7/30/2024	TJM	Participated in team call regarding factual background development and case strategy issues [0.4].	0.4	\$ 700.00	\$ 280.00
7/30/2024	EAA	Team call regarding amended complaint and next steps [0.4].	0.4	\$ 550.00	\$ 220.00
7/30/2024	HMR	Worked on motions for pro hac vice for co-counsel Juno Turner and David Seligman, notes for hearing and proposed orders.	0.6	\$ 200.00	\$ 120.00
7/31/2024	EAA	Personal conference regarding collecting documents from	0.2	\$ 550.00	\$ 110.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
7/31/2024	HMR	Worked on plaintiff's motion for leave to amend complaint, note for hearing, declaration supporting same, and proposed order granting same [.5]	0.5	\$ 200.00	\$ 100.00
8/1/2024	HMR	Worked on plaintiff's motion for leave to amend complaint, note for hearing, proposed order and declaration in support of	0.5	\$ 200.00	\$ 100.00
8/1/2024	EAA	Preparation for meet and confer call with opposing counsel regarding defendant's discovery responses [0.4]; videoconference with opposing counsel regarding defendant's discovery responses and follow up with co counsel regarding	1.1	\$ 550.00	\$ 605.00
8/5/2024	EAA	Email correspondence with plaintiff regarding document gathering and scheduling discussion regarding same [0.2]; reviewed answer to complaint [0.3].	0.5	\$ 550.00	\$ 275.00
8/7/2024	TJM	Analyzed issues regarding addition of current employee as	0.1	\$ 700.00	\$ 70.00
8/7/2024	HB	Teleconference with client regarding document production [.6]; Teleconference regarding client documents [.2].	0.8	\$ 260.00	\$ 208.00
8/7/2024	EAA	Telephone conference regarding document searching and production [0.6]; email follow-up regarding same [0.4]; email correspondence regarding amended complaint [0.2].	1.2	\$ 550.00	\$ 660.00
8/12/2024	EAA	Email correspondence regarding defendant's production [0.2].	0.2	\$ 550.00	\$ 110.00
8/12/2024	HB	Processed defendant's document production [.6].	0.6	\$ 260.00	\$ 156.00
8/26/2024	EAA	Email correspondence regarding amended complaint and new plaintiff [0.2].	0.2	\$ 550.00	\$ 110.00
9/3/2024	EAA	Email check-in regarding document collection status [0.1].	0.1	\$ 550.00	\$ 55.00
9/9/2024	EAA	Worked on drafting motion for leave to amend [1].	1	\$ 550.00	\$ 550.00
9/16/2024	EAA	Email correspondence regarding additional plaintiff and status of document collection [0.3].	0.3	\$ 550.00	\$ 165.00
10/7/2024	EAA	Review and edit amended complaint [0.5]; complete draft of motion for leave to amend [1.3]; draft email to Ms. Rutter regarding discovery [0.1]; review status of discovery responses from defendant and draft meet and confer email regarding	2.4	\$ 550.00	\$ 1,320.00
10/9/2024	EAA	Work on edits to motion for leave to amend [0.4].	0.4	\$ 550.00	\$ 220.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
10/10/2024	EAA	Review and approve final of motion for leave to amend and proposed amended complaint [0.6]; email correspondence	0.8	\$ 550.00	\$ 440.00
10/10/2024	HMR	Worked on and finalized motion for leave to file amended complaint, declaration supporting same, proposed order granting same, and note for motion; electronically filed same; submitted judges' working copies of same. [1]	1	\$ 200.00	\$ 200.00
10/11/2024	HMR	Worked on and finalized attachment to motion for leave to file amended complaint; electronically filed same; submitted judges working copies of same. [5]	0.5	\$ 200.00	\$ 100.00
10/16/2024	EAA	Email correspondence with Ms. Rutter regarding documents	0.2	\$ 550.00	\$ 110.00
10/21/2024	TJM	Worked on case management issues [1].	0.1	\$ 700.00	\$ 70.00
10/21/2024	EAA	Read and analyze response to motion for leave to amend [0.3]; work on drafting reply in support of motion for leave to amend	1.6	\$ 550.00	\$ 880.00
10/21/2024	HMR	Worked on reply in support of motion for leave to amend	0.4	\$ 200.00	\$ 80.00
10/22/2024	TJM	Worked on reply in support of motion for leave to amend complaint and researched and analyzed issues regarding same [1.0]; worked on supplemental declaration in support of same	1.2	\$ 700.00	\$ 840.00
10/22/2024	EAA	Completed draft of reply in support of motion for leave to amend [2.0]; email correspondence regarding revisions to same	2.3	\$ 550.00	\$ 1,265.00
10/22/2024	HMR	Worked on and finalized reply in support of motion for leave to amend complaint and supplemental declaration supporting same; electronically filed same; submitted judges' working	1	\$ 200.00	\$ 200.00
10/22/2024	SD	Conducted research in support of reply brief [3.7].	3.7	\$ 400.00	\$ 1,480.00
10/24/2024	EAA	Review class list and email correspondence regarding same	0.4	\$ 550.00	\$ 220.00
10/24/2024	HB	Processed defendant's document production [2].	0.2	\$ 260.00	\$ 52.00
10/28/2024	TJM	Worked on witness disclosures [4]; email correspondence with co-counsel and opposing counsel regarding same [1].	0.5	\$ 700.00	\$ 350.00
10/28/2024	HMR	Worked on and finalized plaintiffs' possible primary witness disclosures. [4]	0.4	\$ 200.00	\$ 80.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
11/4/2024	HMR	Worked on and finalized plaintiffs' possible primary witness disclosures; emailed same to counsel for all parties. [.5] worked on and finalized amended class action complaint; electronically filed same; updated master caption [.4]	0.9	\$ 200.00	\$ 180.00
11/4/2024	EAA	Review and finalize witness disclosures [0.1]; edit and finalize amended complaint [0.4].	0.5	\$ 550.00	\$ 275.00
11/5/2024	TJM	Worked on case management issues [.1].	0.1	\$ 700.00	\$ 70.00
11/5/2024	HB	Processed defendant's document production [.5].	0.5	\$ 260.00	\$ 130.00
11/12/2024	EAA	Email correspondence with Ms. Rutter to coordinate delivery of documents [0.2]; email correspondence with opposing counsel regarding proposed new case schedule [0.2].	0.4	\$ 550.00	\$ 220.00
11/13/2024	EAA	Email correspondence regarding proposal for extension of case deadlines [0.4].	0.4	\$ 550.00	\$ 220.00
11/13/2024	HMR	Worked on stipulation to extend case schedule deadlines. [.3]	0.3	\$ 200.00	\$ 60.00
11/14/2024	EAA	Personal conference regarding collection and processing of client documents [0.2].	0.2	\$ 550.00	\$ 110.00
11/14/2024	HB	Prepared for scanning client documents [.2]; Met with client and scanned incoming client documents to file [1.2].	1.4	\$ 260.00	\$ 364.00
11/18/2024	EAA	Draft stipulated motion regarding class certification briefing [0.4]; review answer to amended complaint [0.2].	0.6	\$ 550.00	\$ 330.00
11/21/2024	EAA	Review and approve stipulated motion regarding class certification deadlines and proposed order for filing [0.2].	0.2	\$ 550.00	\$ 110.00
11/22/2024	HB	Worked on processing client documents into lpro for review and production [1.0].	1	\$ 260.00	\$ 260.00
11/25/2024	KB	Updated caption form to reflect change in judge assignment	0.1	\$ 200.00	\$ 20.00
11/25/2024	EAA	Reviewed order on judge reassignment and upcoming case deadlines [0.2].	0.2	\$ 550.00	\$ 110.00
12/9/2024	EAA	Reviewed documents for production [0.8]; docketing issues	1	\$ 550.00	\$ 550.00
12/10/2024	KB	Drafted 30(b)(6) deposition notice shell [.2].	0.2	\$ 200.00	\$ 40.00
12/10/2024	EAA	Email correspondence to schedule and prepare for team call	0.2	\$ 550.00	\$ 110.00
12/11/2024	HB	Worked on preparing client documents for production [1.1].	1.1	\$ 260.00	\$ 286.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
12/11/2024	EAA	Review redactions to client documents and approve for production [0.4].	0.4	\$ 550.00	\$ 220.00
12/12/2024	EAA	Approve plaintiff's documents for production [0.1].	0.1	\$ 550.00	\$ 55.00
12/12/2024	HB	Worked on serving document production on counsel [0.3].	0.3	\$ 260.00	\$ 78.00
12/16/2024	TJM	Prepared for team meeting regarding discovery and class certification [0.1]; participated in same [0.6].	0.7	\$ 700.00	\$ 490.00
12/16/2024	EAA	Preparation for team meeting [0.2]; team meeting regarding discovery status and next steps [0.6].	0.8	\$ 550.00	\$ 440.00
12/19/2024	EAA	Reviewed potential expert's CV and profile [0.4]; drafted email correspondence to opposing counsel regarding outstanding discovery issues [0.6].	1	\$ 550.00	\$ 550.00
1/2/2025	EAA	Drafted 30(b)(6) deposition notice [0.6]; drafted email to co-counsel regarding current task list [0.2].	0.8	\$ 550.00	\$ 440.00
1/6/2025	EAA	Email correspondence regarding discovery status and supplemental responses [0.2]; worked on edits to 30(b)(6)	0.4	\$ 550.00	\$ 220.00
1/7/2025	EAA	Email correspondence scheduling call with potential expert	0.1	\$ 550.00	\$ 55.00
1/8/2025	TJM	Prepared for telephone conference with injury and damages expert [0.1]; participated in same [0.3]; worked on CR 30(b)(6)	0.7	\$ 700.00	\$ 490.00
1/8/2025	EAA	Videoconference with potential expert [0.3]; email correspondence regarding 30(b)(6) deposition topics [0.2].	0.5	\$ 550.00	\$ 275.00
1/9/2025	HMR	Worked on plaintiffs' motion for class certification and declaration in support of same. [0.4]	0.4	\$ 200.00	\$ 80.00
1/9/2025	EAA	Worked on notes in preparation for drafting motion for class certification.	0.4	\$ 550.00	\$ 220.00
1/13/2025	HB	Processed defendant's document production [0.5].	0.5	\$ 260.00	\$ 130.00
1/13/2025	EAA	Email correspondence regarding further document production [0.2] worked on reviewing documents produced [2.2]; email correspondence regarding Ms. Chavez's discovery responses [0.2]; drafted email following up on discovery issues [0.4].	3	\$ 550.00	\$ 1,650.00
1/15/2025	HB	Processed defendant's document production [0.2].	0.2	\$ 260.00	\$ 52.00
1/15/2025	EAA	Drafted email to team with list of discovery issues to discuss	0.5	\$ 550.00	\$ 275.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
1/16/2025	TJM	Participated in team meeting regarding deficiencies in defendant's document production and case strategy issues [.4].	0.4	\$ 700.00	\$ 280.00
1/16/2025	EAA	Team videoconference regarding discovery issues [.4].	0.4	\$ 550.00	\$ 220.00
1/21/2025	EAA	Reviewed supplemental discovery responses and drafted email regarding same [0.6].	0.6	\$ 550.00	\$ 330.00
1/22/2025	EAA	Reviewed expert memo regarding potential wage suppression models [0.3]; edited draft of 30(b)(6) deposition notice [0.2].	0.5	\$ 550.00	\$ 275.00
1/23/2025	TJM	Reviewed decision from Washington Supreme Court construing noncompete statute [.3].	0.3	\$ 700.00	\$ 210.00
1/23/2025	EAA	Reviewed Washington Supreme Court case regarding noncompetition law [0.5]; finalized and served 30(b)(6)	1	\$ 550.00	\$ 550.00
1/24/2025	HB	Processed client documents into Ipro for review [.2].	0.2	\$ 260.00	\$ 52.00
1/30/2025	EAA	Reviewed supplemental discovery responses and email correspondence regarding same [0.3].	0.3	\$ 550.00	\$ 165.00
2/3/2025	HB	Processed defendant's document production [.2].	0.2	\$ 260.00	\$ 52.00
2/4/2025	EAA	Email correspondence regarding email issues [0.4]; telephone call with co-counsel regarding documents in preparation for 30(b)(6) deposition and status of Ms. Chavez's discovery	0.6	\$ 550.00	\$ 330.00
2/4/2025	HB	Processed document database to co-counsel for review [.5].	0.5	\$ 260.00	\$ 130.00
2/5/2025	EAA	Reviewed supplemental production [0.3]; reviewed additional documents from Ms. Rutter and approved for production [0.4]; worked on drafting motion for class certification [1.0].	1.7	\$ 550.00	\$ 935.00
2/5/2025	HB	Reviewed defendant's document production and emailed regarding Bates issues with same [.2].	0.2	\$ 260.00	\$ 52.00
2/6/2025	HB	Processed client documents for production and served same on counsel [1.1]; Processed defendant's document production [.4].	1.5	\$ 260.00	\$ 390.00
2/6/2025	EAA	Email correspondence regarding redactions to supplemental production for plaintiff Rutter [0.3]; drafted email to opposing counsel regarding 30(b)(6) deposition notice [0.1].	0.4	\$ 550.00	\$ 220.00
2/10/2025	KB	Formatted and finalized plaintiff Chavez objections and responses to first set of discovery [.4]. Served responses on	0.5	\$ 200.00	\$ 100.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
2/10/2025	EAA	Reviewed and edited plaintiff Chavez's discovery responses [0.8]; approved final of discovery responses for service [0.3].	1.1	\$ 550.00	\$ 605.00
2/11/2025	EAA	Email correspondence regarding 30(b)(6) deposition [0.2].	0.2	\$ 550.00	\$ 110.00
2/12/2025	TJM	Worked on case management issues [0.1].	0.1	\$ 700.00	\$ 70.00
2/12/2025	EAA	Team call regarding case status and next steps [0.4]; follow-up email regarding same [0.2].	0.6	\$ 550.00	\$ 330.00
2/19/2025	EAA	Email correspondence regarding 30(b)(6) deposition scheduling and class certification scheduling [0.3].	0.3	\$ 550.00	\$ 165.00
2/24/2025	EAA	Drafted email to opposing counsel regarding deposition scheduling, meet and confer, and extension of deadlines [0.2].	0.2	\$ 550.00	\$ 110.00
2/25/2025	EAA	Met with co counsel to discuss initial disclosures [1]; drafted stipulated motion to extend deadlines and drafted email	1.3	\$ 550.00	\$ 715.00
2/25/2025	HMR	Worked on stipulated motion to extend deadlines and proposed order. [0.3]	0.3	\$ 200.00	\$ 60.00
2/26/2025	EAA	Finalized stipulated motion regarding class certification	0.3	\$ 550.00	\$ 165.00
2/26/2025	HMR	Worked on and finalized stipulated motion to extend case schedule, proposed order and notice of hearing; electronically filed same; submitted judges working copies of same. [0.5]	0.5	\$ 200.00	\$ 100.00
2/27/2025	EAA	Email correspondence regarding scheduling 30(b)(6) deposition and meet and confer [0.2]; email correspondence with expert regarding scheduling changes [0.1].	0.3	\$ 550.00	\$ 165.00
3/3/2025	EAA	Email correspondence regarding scheduling meet and confer regarding 30(b)(6) notice [0.2].	0.2	\$ 550.00	\$ 110.00
3/4/2025	EAA	Meet and confer call with opposing counsel regarding 30(b)(6) notice [0.5]; preparation for same [0.5]; follow-up email	1.2	\$ 550.00	\$ 660.00
3/5/2025	EAA	Email correspondence regarding preparation for 30(b)(6) deposition [0.3].	0.3	\$ 550.00	\$ 165.00
3/6/2025	EAA	Email correspondence regarding rescheduling 30(b)(6)	0.2	\$ 550.00	\$ 110.00
3/12/2025	EAA	Email correspondence to schedule meeting regarding deposition scheduling [0.1].	0.1	\$ 550.00	\$ 55.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
3/13/2025	EAA	Telephone call with co-counsel regarding rescheduling 30(b)(6) deposition [0.2]; drafted email to opposing counsel regarding same [0.1].	0.3	\$ 550.00	\$ 165.00
3/17/2025	EAA	Email correspondence with opposing counsel regarding rescheduling deposition [0.1].	0.1	\$ 550.00	\$ 55.00
3/19/2025	EAA	Team call regarding 30(b)(6) deposition and other outstanding issues [0.3].	0.3	\$ 550.00	\$ 165.00
3/24/2025	EAA	Email correspondence regarding deposition scheduling [0.2].	0.2	\$ 550.00	\$ 110.00
3/31/2025	EAA	Telephone call with Mr. Bishop regarding stipulation to extend deadlines [0.2]; drafted internal email regarding response to same [0.4].	0.6	\$ 550.00	\$ 330.00
4/1/2025	EAA	Drafted email to opposing counsel regarding extension of class certification briefing schedule [0.6]; internal email correspondence regarding same [0.2].	0.8	\$ 550.00	\$ 440.00
4/2/2025	HMR	Worked on stipulated motion to extend deadlines, proposed order and note for hearing. [0.2]	0.2	\$ 200.00	\$ 40.00
4/2/2025	EAA	Drafted stipulation to extend class certification briefing schedule [0.3]; confirmed Ms. Collins' pro hac vice admission	0.4	\$ 550.00	\$ 220.00
4/7/2025	HMR	Worked on amended notice of 30(b)(6) deposition of defendant. [0.2]; worked on motion for admission pro hac vice	0.6	\$ 200.00	\$ 120.00
4/7/2025	EAA	Reviewed and approved for filing stipulated motion [0.1]; reviewed draft of pro hac vice application for Juno Turner [0.1]; email correspondence regarding amended 30(b)(6) notice [0.2].	0.4	\$ 550.00	\$ 220.00
4/9/2025	HMR	Worked on and finalized amended notice of 30(b)(6) deposition of defendant; emailed same to counsel for all parties; coordinated court reporter. [0.4]	0.4	\$ 200.00	\$ 80.00
4/9/2025	EAA	Reviewed order granting stipulated motion to extend deadlines [0.1]; reviewed and served amended notice of 30(b)(6)	0.3	\$ 550.00	\$ 165.00
4/14/2025	EAA	Email correspondence regarding details for preparation for 30(b)(6) deposition [0.3].	0.3	\$ 550.00	\$ 165.00
4/14/2025	HMR	Coordinated court reporter for april 17, 2025 deposition. [0.1]	0.1	\$ 200.00	\$ 20.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
4/15/2025	EAA	Email correspondence regarding details and preparation for 30(b)(6) deposition [0.2]; email correspondence regarding scheduling depositions of plaintiffs [0.2].	0.4	\$ 550.00	\$ 220.00
4/15/2025	HB	Resent document productions to co-counsel [.4]; Sent email to client re deposition availability [.1].	0.5	\$ 260.00	\$ 130.00
4/16/2025	EAA	Personal conference regarding deposition prep [0.3].	0.3	\$ 550.00	\$ 165.00
4/17/2025	EAA	Attended 30(b)(6) deposition of Bright Horizons [1.9]; personal conferences regarding same [0.3]; preparation for same [0.2].	2.4	\$ 550.00	\$ 1,320.00
4/23/2025	EAA	Email correspondence regarding deposition scheduling [0.2]; drafted task list for case [0.3]; reviewed status of draft of motion for class certification and worked on further drafting of	1.2	\$ 550.00	\$ 660.00
4/24/2025	TJM	Worked on factual background development [.1].	0.1	\$ 700.00	\$ 70.00
4/28/2025	EAA	Email correspondence regarding deposition scheduling [0.2].	0.2	\$ 550.00	\$ 110.00
4/29/2025	EAA	Email correspondence with Mr. Urschel regarding expert work in support of motion for class certification [0.4].	0.4	\$ 550.00	\$ 220.00
5/1/2025	TJM	Video conference with Mr. Urschel regarding expert work [.4].	0.4	\$ 700.00	\$ 280.00
5/1/2025	EAA	Videoconference with Mr. Urschel regarding class certification expert declaration [0.4]; research regarding same [0.7].	1.1	\$ 550.00	\$ 605.00
5/5/2025	EAA	Worked on drafting motion for class certification [1.5].	1.5	\$ 550.00	\$ 825.00
5/7/2025	HB	Processed incoming deposition transcripts [-2].	0.2	\$ 260.00	\$ 52.00
5/7/2025	EAA	Worked on drafting motion for class certification [0.7].	0.7	\$ 550.00	\$ 385.00
5/8/2025	EAA	Worked on drafting motion for class certification [2.2].	2.2	\$ 550.00	\$ 1,210.00
5/12/2025	TJM	Worked on materials in support of motion for class certification	0.1	\$ 700.00	\$ 70.00
5/12/2025	EAA	Worked on drafting motion for class certification [2.5]; reviewed and edited Urschel Declaration [1.3]; drafted email to Ms. Rutter regarding deposition prep [0.2].	4	\$ 550.00	\$ 2,200.00
5/13/2025	TJM	Worked on motion for class certification [1.7]; worked on expert declaration in support of same [1.9].	3.6	\$ 700.00	\$ 2,520.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
5/13/2025	EAA	Completed draft of motion for class certification [1.7]; worked on edits to same [0.8]; personal conference regarding motion and Urschel Declaration [0.3]; email correspondence regarding Ms. Rutter's deposition and deposition prep [0.3].	3.1	\$ 550.00	\$ 1,705.00
5/13/2025	HB	Teleconference with client re deposition [1.1].	0.1	\$ 260.00	\$ 26.00
5/14/2025	TJM	Worked on motion for class certification [1.2].	1.2	\$ 700.00	\$ 840.00
5/14/2025	EAA	Worked on edits to motion for class certification [1.2]; email correspondence regarding additional questions and issues related to motion for class certification [0.4]; reviewed and edited Towards Justice declaration in support of class certification [0.2]; reviewed Urschel declaration status and certification [1.2].	2.4	\$ 550.00	\$ 1,320.00
5/14/2025	HB	Worked on motion for class certification [1.2].	1.2	\$ 260.00	\$ 312.00
5/15/2025	TJM	Worked on motion for class certification [1.2].	0.5	\$ 700.00	\$ 350.00
5/15/2025	EAA	Reviewed exhibits and citations for motion for class certification [0.7]; reviewed and proofread Urschel declaration [0.7]; reviewed Collins declaration [0.3]; reviewed updated declarations and exhibits [0.5]; telephone call with Ms. Rutter regarding case status and preparation for deposition [0.5]; drafted proposed order on motion for class certification [0.4]; reviewed and approved final documents for motion for class certification [0.7].	3.6	\$ 550.00	\$ 1,980.00
5/15/2025	HB	Worked on motion for class certification [1.2].	0.7	\$ 260.00	\$ 182.00
5/15/2025	HMR	Worked on and finalized plaintiffs' motion for class certification, declarations supporting same, note for motion and proposed order; worked on index of non-washington	1	\$ 200.00	\$ 200.00
5/16/2025	TJM	Worked on case management issues [1.1].	0.1	\$ 700.00	\$ 70.00
5/16/2025	HMR	Finalized plaintiffs' motion for class certification, declarations supporting same, note for motion and proposed order; worked on index of non-washington authorities; electronically filed	0.3	\$ 200.00	\$ 60.00
5/19/2025	EAA	Gathered documents and prepared outline for deposition prep session with Ms. Rutter [2.5]; deposition prep session with Ms.	4.4	\$ 550.00	\$ 2,420.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
5/21/2025	EAA	Email correspondence regarding production of Ms. Chavez's documents [0.2].	0.2	\$ 550.00	\$ 110.00
5/22/2025	LAM	Worked on producing Pl's documents to Def [0.5].	0.5	\$ 210.00	\$ 105.00
5/22/2025	EAA	Worked on getting Ms. Chavez's documents produced [1.2]; prepared to defend Ms. Rutter's deposition [1.5]; met with co counsel to discuss discovery disclosures [1].	3.7	\$ 550.00	\$ 2,035.00
5/27/2025	EAA	Preparation for defending deposition of Ms. Rutter [0.3]; defended deposition of Ms. Rutter [6.8]; personal conferences with Ms. Rutter regarding deposition [0.6].	7.7	\$ 550.00	\$ 4,235.00
5/29/2025	EAA	Personal conference regarding designating deposition testimony as confidential [0.1]; reviewed protective order	0.3	\$ 550.00	\$ 165.00
6/3/2025	HB	Processed defendant's document production [0.6].	0.6	\$ 260.00	\$ 156.00
6/3/2025	EAA	Email correspondence regarding Bright Horizons production processing [0.2].	0.2	\$ 550.00	\$ 110.00
6/4/2025	EAA	Email correspondence regarding confidentiality designations for Ms. Rutter's deposition transcript [0.2]; reviewed new set of documents produced by defendant [0.4].	0.6	\$ 550.00	\$ 330.00
6/11/2025	EAA	Email correspondence regarding Rutter deposition transcript	0.2	\$ 550.00	\$ 110.00
6/12/2025	EAA	Reviewed deposition testimony to assess confidentiality designations [0.7].	0.7	\$ 550.00	\$ 385.00
6/16/2025	HMR	Worked on reply in support of motion for class certification and supplemental declaration supporting same. [.3]	0.3	\$ 200.00	\$ 60.00
6/16/2025	EAA	Reviewed and analyzed response to motion for class certification and commenced drafting reply in support of same	1.2	\$ 550.00	\$ 660.00
6/17/2025	EAA	Worked on drafting reply in support of class certification [2.8].	2.8	\$ 550.00	\$ 1,540.00
6/18/2025	TJM	Worked on reply brief in support of class certification and researched and analyzed issues regarding same [.9]; analyzed issues regarding defendant's proposal for engaging in settlement talks and email correspondence with opposing counsel and co-counsel regarding same [.4].	1.3	\$ 700.00	\$ 910.00
6/18/2025	HB	Processed incoming deposition transcript [.2].	0.2	\$ 260.00	\$ 52.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
6/18/2025	EAA	Telephone conference regarding reply in support of class certification [0.8]; worked on drafting same [2.9]; email correspondence and telephone call regarding settlement [0.6].	4.3	\$ 550.00	\$ 2,365.00
6/20/2025	TJM	Email to opposing counsel responding to inquiry regarding potential settlement talks [-.1]; worked on reply in support of motion for class certification [1.3].	1.4	\$ 700.00	\$ 980.00
6/21/2025	TJM	Worked on reply in support of motion for class certification and researched and analyzed issues regarding same [2.1].	2.1	\$ 700.00	\$ 1,470.00
6/24/2025	TJM	Worked on reply in support of class certification [-.1].	0.1	\$ 700.00	\$ 70.00
6/25/2025	TJM	Analyzed issues regarding proposed settlement talks and potential mediators [-.4]; email correspondence with co-counsel and opposing counsel regarding same [-.1]; drafted stipulation to stay consideration of class certification motion pending mediation [-.2]; worked on reply in support of class certification	1.6	\$ 700.00	\$ 1,120.00
6/25/2025	HMR	Worked on joint motion to stay consideration of plaintiffs' motion for class certification. [-.2]	0.2	\$ 200.00	\$ 40.00
6/26/2025	TJM	Worked on finalizing reply in support of motion for class certification and supplemental declaration [1.1].	1.1	\$ 700.00	\$ 770.00
6/26/2025	HB	Worked on reply in support of class certification [-.5].	0.5	\$ 260.00	\$ 130.00
6/27/2025	HMR	Worked on and finalized reply in support of motion for class certification, supplemental declaration supporting same, index of non-washington authorities cited in reply, joint motion to stay, proposed order and notice of hearing; electronically filed same; emailed index of non-washington authorities to counsel for all parties; submitted judges working copies of same. [1]	1	\$ 200.00	\$ 200.00
6/30/2025	EAA	Reviewed transcript of Ms. Rutter's deposition for errors and confidentiality designations [2.5].	2.5	\$ 550.00	\$ 1,375.00
7/1/2025	EAA	Reviewed order granting joint motion to stay ruling on class certification [0.1]; drafted email to bailiff regarding same [0.1].	0.2	\$ 550.00	\$ 110.00
7/2/2025	TJM	Worked on issues regarding mediation [-.1].	0.1	\$ 700.00	\$ 70.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
7/3/2025	TJM	Analyzed issues regarding mediation and email correspondence with opposing counsel regarding proposed mediators [.2].	0.2	\$ 700.00	\$ 140.00
7/8/2025	TJM	Analyzed issues regarding status of mediation scheduling efforts and email correspondence with opposing counsel	0.2	\$ 700.00	\$ 140.00
7/8/2025	HMR	Worked on errata and declaration for deposition of Chelsea Rutter; emailed same to Ms. Rutter for signature via docuSign.	0.2	\$ 200.00	\$ 40.00
7/8/2025	EAA	Email correspondence with Ms. Rutter regarding errata and mediation [0.2]; worked on final errata and confidentiality designations [1.5]; email correspondence regarding mediation	2	\$ 550.00	\$ 1,100.00
7/9/2025	TJM	Worked on scheduling of mediation and email correspondence with co-counsel and opposing counsel regarding same [.2]; worked on joint status report [.1].	0.3	\$ 700.00	\$ 210.00
7/9/2025	EAA	Email correspondence regarding confidentiality designations	0.2	\$ 550.00	\$ 110.00
7/9/2025	HMR	Worked on joint status update. [.3]	0.3	\$ 200.00	\$ 60.00
7/10/2025	TJM	Email correspondence with opposing counsel and co-counsel regarding scheduling of mediation [.1]; analyzed issues regarding same [.1]; worked on joint status report and email correspondence with opposing counsel regarding same [.2].	0.4	\$ 700.00	\$ 280.00
7/10/2025	EAA	Drafted joint status update [0.4]; email correspondence regarding mediation scheduling [0.2]; telephone call with Ms. Rutter regarding case updates [0.6]; prepared and submitted final confidentiality designations and errata sheet for Rutter	1.6	\$ 550.00	\$ 880.00
7/10/2025	HMR	Downloaded errata and declaration from docuSign. [.1]	0.1	\$ 200.00	\$ 20.00
7/11/2025	HMR	Worked on and finalized joint status update; electronically filed same. [.2]	0.2	\$ 200.00	\$ 40.00
7/15/2025	TJM	Email correspondence with opposing counsel regarding scheduling of mediation [.1].	0.1	\$ 700.00	\$ 70.00
7/16/2025	TJM	Analyzed issues regarding mediation and email correspondence with mediator's assistant regarding same [.1].	0.1	\$ 700.00	\$ 70.00
7/16/2025	EAA	Email correspondence regarding mediation scheduling [0.2].	0.2	\$ 550.00	\$ 110.00
7/21/2025	HMR	Emailed mediation agreement to client for signature via	0.1	\$ 200.00	\$ 20.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
7/21/2025	EAA	Mediation agreement fees and details [0.3].	0.3	\$ 550.00	\$ 165.00
8/7/2025	EAA	Email check-in regarding mediation prep [0.2].	0.2	\$ 550.00	\$ 110.00
8/20/2025	TJM	Analyzed issues regarding strategy and preparation for	0.2	\$ 700.00	\$ 140.00
8/20/2025	EAA	Email correspondence regarding damages for mediation [0.2].	0.2	\$ 550.00	\$ 110.00
8/21/2025	EAA	Email correspondence regarding mediation preparation [0.2].	0.2	\$ 550.00	\$ 110.00
9/3/2025	TJM	Participated in meeting with co-counsel regarding preparation for mediation [.4].	0.4	\$ 700.00	\$ 280.00
9/3/2025	EAA	Team videoconference regarding mediation strategy and damages analysis [0.4]; reviewed and analyzed class data for	0.8	\$ 550.00	\$ 440.00
9/9/2025	EAA	Email correspondence regarding damages analysis for	0.2	\$ 550.00	\$ 110.00
9/10/2025	TJM	Analyzed issues regarding damages estimates prepared for mediation [.1]; prepared for video conference with expert regarding same [.1]; participated in video conference with	0.6	\$ 700.00	\$ 420.00
9/10/2025	EAA	Videoconference with expert regarding damages calculations for mediation [.4]; advance and follow-up email correspondence regarding same [0.6].	1	\$ 550.00	\$ 550.00
9/17/2025	EAA	Reviewed and analyzed expert calculations for mediation damages [0.2].	0.2	\$ 550.00	\$ 110.00
9/18/2025	TJM	Analyzed issues regarding damages calculations in preparation for mediation [.2].	0.2	\$ 700.00	\$ 140.00
9/18/2025	EAA	Worked on drafting mediation submission [0.5].	0.5	\$ 550.00	\$ 275.00
9/18/2025	HMR	Drafted plaintiffs' mediation statement [.2].	0.2	\$ 200.00	\$ 40.00
9/25/2025	EAA	Met with co counsel to discuss mediation strategy [1].	1	\$ 550.00	\$ 550.00
9/30/2025	EAA	Worked on drafting mediation submission [2.2].	2.2	\$ 550.00	\$ 1,210.00
10/1/2025	EAA	Worked on drafting mediation submission [1.6].	1.6	\$ 550.00	\$ 880.00
10/2/2025	EAA	Completed draft of mediation submission [1.7].	1.7	\$ 550.00	\$ 935.00
10/6/2025	TJM	Worked on mediation submission [1.2]; reviewed defendant's mediation submission and analyzed issues regarding same in preparation for mediation [.5].	1.7	\$ 700.00	\$ 1,190.00
10/6/2025	HMR	Revised and finalized plaintiffs' mediation statement; emailed same along with exhibits to mediator and counsel for all parties	0.4	\$ 200.00	\$ 80.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
10/6/2025	HB	Prepared exhibits in support of mediation submission [.3]; Reviewed mediation submission [.3].	0.6	\$ 260.00	\$ 156.00
10/6/2025	EAA	Personal conference regarding mediation submission [0.2]; worked on edits to mediation submission [0.8]; email correspondence regarding mediation [0.2].	1.2	\$ 550.00	\$ 660.00
10/8/2025	TJM	Researched and analyzed various issues in preparation for mediation [.3]; video conference with co-counsel regarding preparation for mediation [.5].	0.8	\$ 700.00	\$ 560.00
10/8/2025	PM	Researched four cases relating to settlement agreements and created research document listing information relating to those	2	\$ 200.00	\$ 400.00
10/8/2025	EAA	Telephone conference in preparation for mediation [0.5]; email follow-up regarding same [0.2].	0.7	\$ 550.00	\$ 385.00
10/9/2025	TJM	Prepared for and participated in mediation [9.5].	9.5	\$ 700.00	\$ 6,650.00
10/9/2025	EAA	Participated in mediation and drafted CR 2A agreement during	8	\$ 550.00	\$ 4,400.00
10/10/2025	TJM	Worked on CR 2A agreement and analyzed issues regarding same [2.0]; telephone conference with opposing counsel	2.2	\$ 700.00	\$ 1,540.00
10/10/2025	EAA	Personal conference to discuss class definition for settlement purposes and other terms of draft CR 2A agreement [0.3].	0.3	\$ 550.00	\$ 165.00
10/13/2025	TJM	Email correspondence with co-counsel and opposing counsel regarding draft CR 2A and proposed cy pres beneficiary [.1].	0.1	\$ 700.00	\$ 70.00
10/14/2025	TJM	Analyzed issues regarding defendant's proposed revisions to settlement agreement and email correspondence with co-counsel regarding same [.6].	0.6	\$ 700.00	\$ 420.00
10/15/2025	TJM	Met with co counsel to discuss settlement terms [.5].	0.5	\$ 700.00	\$ 350.00
10/15/2025	TJM	Worked on CR 2A agreement and related disputes [.5].	0.5	\$ 700.00	\$ 350.00
10/17/2025	TJM	Worked on settlement issues [.3]; email correspondence with opposing counsel regarding same [.2].	0.5	\$ 700.00	\$ 350.00
10/20/2025	HMR	Drafted joint status report. [.1]	0.1	\$ 200.00	\$ 20.00
10/20/2025	EAA	Email correspondence regarding settlement [0.2].	0.2	\$ 550.00	\$ 110.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
10/21/2025	TJM	Worked on draft language for CR 2A agreement and email correspondence with co-counsel regarding same [.5]; worked on joint status report [.1].	0.6	\$ 700.00	\$ 420.00
10/21/2025	EAA	Prepared draft of joint status report regarding settlement [0.3].	0.3	\$ 550.00	\$ 165.00
10/22/2025	EAA	Reviewed edits to joint status report [0.2].	0.2	\$ 550.00	\$ 110.00
10/23/2025	HMR	Revised and finalized joint status report; electronically filed	0.4	\$ 200.00	\$ 80.00
10/23/2025	TJM	Met with co counsel to discuss settlement confidentiality terms [.5]; worked on final edits to joint status report and approved	0.7	\$ 700.00	\$ 490.00
10/27/2025	TJM	Worked on settlement issues and proposed language for CR 2A agreement [.3].	0.3	\$ 700.00	\$ 210.00
10/29/2025	TJM	Message from opposing counsel regarding settlement issues and email to co-counsel regarding same [.1].	0.1	\$ 700.00	\$ 70.00
10/30/2025	TJM	Worked on settlement issues and email correspondence with co-counsel and opposing counsel regarding same [.3].	0.3	\$ 700.00	\$ 210.00
10/31/2025	TJM	Video conference with co-counsel regarding settlement issues [.4]; telephone conference with opposing counsel regarding same [.3]; worked on same [.4].	1.1	\$ 700.00	\$ 770.00
11/3/2025	TJM	Worked on settlement issues and met with co-counsel regarding same [.4].	0.4	\$ 700.00	\$ 280.00
11/4/2025	TJM	Worked on settlement issues and email correspondence with co-counsel and opposing counsel regarding same [.2].	0.2	\$ 700.00	\$ 140.00
11/10/2025	TJM	Reviewed proposed edits to draft press release and email correspondence with co-counsel regarding same [.1].	0.1	\$ 700.00	\$ 70.00
11/13/2025	TJM	Worked on draft confidentiality clause and press release and email correspondence with co-counsel and opposing counsel regarding same [.3].	0.3	\$ 700.00	\$ 210.00
11/17/2025	EAA	Worked on reviewing and editing settlement agreement draft	1.1	\$ 550.00	\$ 605.00
11/19/2025	EAA	Reviewed and edited draft settlement agreement [1.1].	1.1	\$ 550.00	\$ 605.00
11/24/2025	EAA	Reviewed edits to settlement agreement [0.3].	0.3	\$ 550.00	\$ 165.00
11/25/2025	TJM	Worked on settlement agreement issues [.2].	0.2	\$ 700.00	\$ 140.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
11/26/2025	EAA	Drafted email to opposing counsel regarding further edits to settlement agreement [0.4].	0.4	\$ 550.00	\$ 220.00
12/3/2025	AMS	Strategy conference regarding motion for preliminary approval [1.2]; briefly reviewed settlement agreement and complaint [1.3].	0.5	\$ 675.00	\$ 337.50
12/3/2025	EAA	Personal conference and email correspondence regarding status of settlement agreement [0.3].	0.3	\$ 550.00	\$ 165.00
12/4/2025	KB	Updated settlement agreement to include plaintiff's counsel signature [1.1]; provided settlement agreement to client for signature via docusign [1.1].	0.2	\$ 200.00	\$ 40.00
12/4/2025	AMS	Strategy conference regarding notice and settlement administration issues [1.2].	0.2	\$ 675.00	\$ 135.00
12/4/2025	ESC	Research for motion for preliminary approval of settlement	1.5	\$ 350.00	\$ 525.00
12/4/2025	EAA	Email correspondence regarding settlement agreement [0.5].	0.5	\$ 550.00	\$ 275.00
12/5/2025	KB	Revised settlement agreement [1.1]; provided revised settlement agreement to client via docusign for signature [1.1].	0.2	\$ 200.00	\$ 40.00
12/8/2025	KB	Reviewed settlement agreement uploaded to docusign for client signature [1.1].	0.1	\$ 200.00	\$ 20.00
12/8/2025	BET	Reviewed draft settlement agreement and issue relating to motion for preliminary approval [1.1]; proposed changes to settlement agreement [1.6]; personal conferences regarding	1.2	\$ 700.00	\$ 840.00
12/8/2025	TJM	Analyzed issues regarding draft settlement agreement [1.2].	0.2	\$ 700.00	\$ 140.00
12/8/2025	HB	Reviewed draft settlement agreement and prepared settlement administration bid chart [1.3].	0.3	\$ 260.00	\$ 78.00
12/8/2025	EAA	Personal conference regarding preliminary approval motion [0.7]; telephone conference regarding settlement details [0.4]; worked on further edits to settlement agreement [1.2].	2.3	\$ 550.00	\$ 1,265.00
12/8/2025	ESC	Drafted preliminary approval motion [3]; discussed approach to preliminary approval motion and edits to the settlement agreement with team [1.3].	4.3	\$ 350.00	\$ 1,505.00
12/8/2025	AMS	Worked on settlement issues and related strategy conferences	0.6	\$ 675.00	\$ 405.00
12/9/2025	BET	Worked on settlement issues and draft documents [1.6].	0.6	\$ 700.00	\$ 420.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
12/9/2025	KB	Drafted motion shell for preliminary approval [.1]; drafted declaration shell in support of preliminary approval [.1]; drafted proposed order regarding preliminary approval [.1]; drafted notice of hearing for preliminary approval [.1].	0.4	\$ 200.00	\$ 80.00
12/9/2025	ESC	Drafted preliminary approval motion [2.9].	2.9	\$ 350.00	\$ 1,015.00
12/9/2025	EAA	Worked on edits to settlement agreement [1.3];	1.3	\$ 550.00	\$ 715.00
12/10/2025	BET	Reviewed and revised draft settlement agreement [.4]; analyzed notice documents and revised same [.3].	0.7	\$ 700.00	\$ 490.00
12/10/2025	TJM	Worked on settlement issues [.5].	0.5	\$ 700.00	\$ 350.00
12/10/2025	ESC	Drafted preliminary approval motion, TMLG declaration, and proposed order [5].	5	\$ 350.00	\$ 1,750.00
12/10/2025	EAA	Reviewed and edited settlement long form notice [1.1]; email correspondence regarding notice issues [0.5].	1.6	\$ 550.00	\$ 880.00
12/11/2025	ESC	Drafted preliminary approval motion and TMLG declaration	4.1	\$ 350.00	\$ 1,435.00
12/11/2025	KB	Drafted index of non-Washington authorities cited in motion for preliminary approval [.1].	0.1	\$ 200.00	\$ 20.00
12/11/2025	EAA	Email correspondence regarding notice and settlement agreement [0.2]; drafted email to opposing counsel regarding notice plan proposals [0.4]; worked on further edits to	1.9	\$ 550.00	\$ 1,045.00
12/12/2025	BET	Worked on settlement documents [.6]; personal conferences regarding same [.2]; telephone conference with Mr. Bishop regarding settlement issues [.4].	1.2	\$ 700.00	\$ 840.00
12/12/2025	ESC	Drafted preliminary approval of settlement agreement and non-Wash auth index [2.4]; revised settlement agreement [.7].	3.1	\$ 350.00	\$ 1,085.00
12/12/2025	AMS	Strategy conferences regarding settlement agreement [.3].	0.3	\$ 675.00	\$ 202.50
12/15/2025	ESC	Revised proposed settlement agreement [7.1].	7.1	\$ 350.00	\$ 2,485.00
12/16/2025	ESC	Revised proposed settlement agreement [3.1].	3.1	\$ 350.00	\$ 1,085.00
12/18/2025	HB	Prepared settlement administration bid requests [.3].	0.3	\$ 260.00	\$ 78.00
12/18/2025	EAA	Drafted email and postcard notices [1.2]; drafted instructions for gathering administrator bids [0.4].	1.6	\$ 550.00	\$ 880.00
12/18/2025	BET	Worked on settlement issues [.3].	0.3	\$ 700.00	\$ 210.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
12/18/2025	ESC	Revised settlement agreement [.8].	0.8	\$ 350.00	\$ 280.00
12/19/2025	BET	Analyzed changes to settlement agreement [.4]; emailed summary of same to Mr. Bishop [.1].	0.5	\$ 700.00	\$ 350.00
12/19/2025	ESC	Revised settlement agreement and summarized changes to opposing counsel [3.2].	3.2	\$ 350.00	\$ 1,120.00
12/23/2025	ESC	Contacted potential settlement administrators re: signing protective order ahead of seeking bids and drafted request for	3.5	\$ 350.00	\$ 1,225.00
12/26/2025	ESC	Contacted potential settlement administrators and fielded questions [1.4].	1.4	\$ 350.00	\$ 490.00
12/29/2025	ESC	Discussed settlement administrator bids with team [.1]; fielded questions from settlement administrator bidders [1.1].	1.2	\$ 350.00	\$ 420.00
12/30/2025	ESC	Fielded questions about settlement administrator bids and questions from opposing counsel regarding revised settlement	0.3	\$ 350.00	\$ 105.00
1/5/2026	ESC	Drafted preliminary approval briefing [3.6].	3.6	\$ 350.00	\$ 1,260.00
1/6/2026	ESC	Fielded questions from potential settlement administrators on	0.4	\$ 350.00	\$ 140.00
1/7/2026	ESC	Fielded questions regarding settlement administrator bids [.1].	0.1	\$ 350.00	\$ 35.00
1/8/2026	BET	Analyzed Mr. Bishop's response to proposed changes to settlement agreement [.2] personal conference regarding same	0.4	\$ 700.00	\$ 280.00
1/8/2026	ESC	Revised long form notice [1.6].	1.6	\$ 350.00	\$ 560.00
1/8/2026	TJM	Worked on settlement issues [.1].	0.1	\$ 700.00	\$ 70.00
1/9/2026	ESC	Fielded questions from and analyzed settlement administrator bids [.3]; revised settlement agreement with comments and edits from opposing counsel [1.9].	2.2	\$ 350.00	\$ 770.00
1/12/2026	BET	Worked on settlement issues [.3].	0.3	\$ 700.00	\$ 210.00
1/12/2026	ESC	Revised settlement agreement with edits from opposing counsel and adjusted email, postcard, and longform notice	1.9	\$ 350.00	\$ 665.00
1/20/2026	ESC	Followed up with co-counsel regarding settlement agreement	0.1	\$ 350.00	\$ 35.00
1/25/2026	ESC	Revised settlement agreement and notices with opposing counsel's edits [1].	1	\$ 350.00	\$ 350.00
1/26/2026	TJM	Worked on settlement agreement issues [.2].	0.2	\$ 700.00	\$ 140.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
1/26/2026	HMR	Revised and finalized settlement agreement and release with exhibits; added signature for Mr. Marshall; emailed to client	0.4	\$ 200.00	\$ 80.00
1/26/2026	ESC	Chelsea Rutter for signature via docusign. [1.4]	0.8	\$ 350.00	\$ 280.00
1/26/2026	EAA	Finalized settlement agreement and notices and sent for	0.5	\$ 550.00	\$ 275.00
1/27/2026	ESC	Email correspondence with client regarding final settlement agreement [0.2]; personal conference regarding logistics for executing settlement agreement [0.3].	1	\$ 350.00	\$ 350.00
1/30/2026	ESC	Analyzed settlement bids [1].	0.3	\$ 350.00	\$ 105.00
1/31/2026	ESC	Called client re: settlement agreement signature; worked on preliminary approval motion materials [3].	3.2	\$ 350.00	\$ 1,120.00
2/1/2026	ESC	Revised preliminary approval motion materials [3.2].	2.4	\$ 350.00	\$ 840.00
2/2/2026	ESC	Settlement administrator bid comparison [2.4].	0.9	\$ 350.00	\$ 315.00
2/3/2026	ESC	Reviewed settlement administrator bids [1.7]; contacted client about Settlement Agreement signature [2].	4.3	\$ 350.00	\$ 1,505.00
2/3/2026	EAA	Drafted preliminary approval motion [3.7]; worked on finalizing settlement administrator bid [6].	0.3	\$ 550.00	\$ 165.00
2/4/2026	ESC	Personal conference regarding motion for preliminary approval	0.6	\$ 350.00	\$ 210.00
2/4/2026	AMS	Confirming settlement administrator and revising preliminary approval motion [6].	4.2	\$ 675.00	\$ 2,835.00
2/5/2026	ESC	Revised preliminary approval motion, declaration and proposed order [4.2].	4.4	\$ 350.00	\$ 1,540.00
2/6/2026	ESC	Drafted preliminary approval motion and associated documents	1.6	\$ 350.00	\$ 560.00
2/6/2026	AMS	Preliminary approval motion revisions [1.6].	1.4	\$ 675.00	\$ 945.00
2/9/2026	TJM	Revised preliminary approval motion and declaration [1.2]; strategy conference regarding motion [2].	1.9	\$ 700.00	\$ 1,330.00
2/9/2026	ESC	Worked on preliminary approval motion and related documents and researched and analyzed issues regarding same	1.4	\$ 350.00	\$ 490.00
2/9/2026	ESC	Revised preliminary approval motion [1.4].			

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
2/9/2026	EAA	Reviewed portion of preliminary approval motion regarding risks of continued litigation and edited same [0.3]; personal conference regarding same [0.1]; personal conference regarding settlement allocation questions [0.2].	0.6	\$ 550.00	\$ 330.00
2/10/2026	EAA	Email correspondence regarding settlement allocation issues	0.2	\$ 550.00	\$ 110.00
2/10/2026	TJM	Worked on preliminary approval materials [1.1].	0.1	\$ 700.00	\$ 70.00
2/10/2026	ESC	Revise preliminary approval motion [1.8].	1.8	\$ 350.00	\$ 630.00
2/11/2026	ESC	Communicated with co-counsel regarding preliminary approval motion draft [1.1].	0.1	\$ 350.00	\$ 35.00
2/12/2026	ESC	Revised and finalized preliminary approval materials and sent to opposing counsel for review [1.7].	0.7	\$ 350.00	\$ 245.00
2/17/2026	ESC	Coordinated revisions of the preliminary approval motion and associated materials with opposing counsel [1.2].	0.2	\$ 350.00	\$ 70.00
2/18/2026	ESC	Incorporated opposing counsel edits to preliminary approval motion and associated documents [1.6].	1.6	\$ 350.00	\$ 560.00
2/19/2026	ESC	Finalized and filed preliminary approval motion [1.5].	1.5	\$ 350.00	\$ 525.00
2/20/2026	ESC	Communicated with settlement administrator regarding preliminary approval motion filing and provided materials [1.3].	0.3	\$ 350.00	\$ 105.00
2/26/2026	TJM	Analyzed issues regarding timing of final approval hearing and email correspondence with bailiff regarding same [1.2].	0.2	\$ 700.00	\$ 140.00
2/26/2026	ESC	Communicated with chambers regarding final approval motion scheduling [1.1].	0.1	\$ 350.00	\$ 35.00
3/3/2026	TJM	Email correspondence with courtroom deputy regarding scheduling of final approval hearing [1.1].	0.1	\$ 700.00	\$ 70.00
3/5/2026	TJM	Email correspondence with bailiff regarding settlement agreement filing and preliminary approval order [1.1]; analyzed issues regarding same [1.1].	0.2	\$ 700.00	\$ 140.00
3/5/2026	ESC	Preliminary approval motion granted and communicated with co-counsel, clients, and settlement administrator [1.2].	0.2	\$ 350.00	\$ 70.00
3/9/2026	ESC	Coordinated with team to schedule settlement administrator meeting [1.2].	0.2	\$ 350.00	\$ 70.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
3/10/2026	ESC	Coordinated with settlement administration team to schedule meeting [.3].	0.3	\$ 350.00	\$ 105.00
3/11/2026	ESC	Prepared for meeting with settlement administrator and tracked internal deadlines [.7].	0.7	\$ 350.00	\$ 245.00
3/12/2026	TJM	Prepared for and participated in video conference with settlement administrator regarding notice and payments [.4]; analyzed issues regarding same [.2].	0.6	\$ 700.00	\$ 420.00
3/12/2026	ESC	prepped for meeting with Settlement Administrator to discuss upcoming deadlines [.6]; met with Settlement Administrator to discussing upcoming deadlines [.4].	1	\$ 350.00	\$ 350.00
3/16/2026	ESC	Communicated with opposing counsel and settlement administrator about URL domain option and updated mailing address on notice forms [.3].	0.3	\$ 350.00	\$ 105.00
3/17/2026	TJM	Worked on settlement administration issues [.4].	0.4	\$ 700.00	\$ 280.00
3/17/2026	ESC	Communicated with settlement administrator regarding URL purchase and method of soliciting e-payment preference from	1.1	\$ 350.00	\$ 385.00
3/18/2026	ESC	Communicated with opposing counsel about getting class list	0.1	\$ 350.00	\$ 35.00
3/18/2026	HMR	Revised and finalized notice of address change; electronically filed same. [.1]	0.1	\$ 200.00	\$ 20.00
3/19/2026	ESC	Received, reviewed, and transferred to settlement administrator the class list data from opposing counsel. [.4].	0.4	\$ 350.00	\$ 140.00
3/19/2026	HB	Processed incoming class list to file [.3]; Transmitted same to settlement administrator via Sharefile [.3].	0.6	\$ 260.00	\$ 156.00
3/20/2026	TJM	Worked on settlement notices [.5].	0.5	\$ 700.00	\$ 350.00
3/20/2026	ESC	Revised website draft and revised notice documents from Settlement Administrator [1.9].	1.9	\$ 350.00	\$ 665.00
3/23/2026	TJM	Worked on settlement administration issues [.6].	0.6	\$ 700.00	\$ 420.00
3/23/2026	ESC	Coordinate with team and settlement administrator re: settlement notice e-payment process [.2].	0.2	\$ 350.00	\$ 70.00
3/23/2026	BHC	Responded to questions regarding settlement administration	0.2	\$ 600.00	\$ 120.00

Terrell Marshall Law Group PLLC Fees

Date	Initials	Narrative	Units	Price	Value
3/24/2026	ESC	Communicated with settlement administrator regarding e-payment process [.1].	1	\$ 350.00	\$ 350.00
3/25/2026	ESC	Communicated with team and settlement administrator regarding e-payment process [.9].	0.9	\$ 350.00	\$ 315.00
3/27/2026	ESC	Followed up with Settlement Administrator and opposing counsel regarding revised notice drafts including e-payment	0.1	\$ 350.00	\$ 35.00
3/30/2026	ESC	Communicated with opposing counsel regarding e-payment process [.3].	0.3	\$ 350.00	\$ 105.00
3/30/2026	TJM	Worked on settlement administration issues [.2].	0.2	\$ 700.00	\$ 140.00
4/2/2026	TJM	Worked on settlement administration issues [.1].	0.1	\$ 700.00	\$ 70.00
4/6/2026	ESC	Communicated with co-counsel regarding notice plan status	0.4	\$ 350.00	\$ 140.00
4/6/2026	HB	Sent class list to co-counsel via Sharefile [.2].	0.2	\$ 260.00	\$ 52.00
4/7/2026	ESC	Class member contact [.1].	0.1	\$ 350.00	\$ 35.00
4/9/2026	TJM	Analyzed issues regarding potential additional class members	0.2	\$ 700.00	\$ 140.00
4/9/2026	ESC	Created plan with team for screening potential class members not included on the class list [.3].	0.3	\$ 350.00	\$ 105.00
4/10/2026	TJM	Analyzed issues regarding expert expenses [.1].	0.1	\$ 700.00	\$ 70.00
4/10/2026	ESC	Screening potential class members not included on the class list and drafting e-payment reminder email [.5].	0.5	\$ 350.00	\$ 175.00
4/11/2026	TJM	Worked on postcard notice [.2].	0.2	\$ 700.00	\$ 140.00
4/13/2026	ESC	Circulated e-payment reminder email to co-counsel and opposing counsel for review [.5].	0.5	\$ 350.00	\$ 175.00
4/16/2026	TJM	Reviewed opt-out request, analyzed issues regarding same, and email correspondence with co-counsel regarding same [.1].	0.1	\$ 700.00	\$ 70.00
4/16/2026	ESC	Reviewed opt-out request and communicated with opposing counsel regarding e-payment process plan [.1].	0.1	\$ 350.00	\$ 35.00
4/20/2026	ESC	Began planning motion for fees and costs [.4].	0.4	\$ 350.00	\$ 140.00
4/21/2026	TJM	Worked on postcard notice [.1].	0.1	\$ 700.00	\$ 70.00
		Total	481.2		\$ 239,369.50

- Exhibit B -

FILED
THOMAS M. SLAGLE, CLERK

20 FEB 14 10:08

SUPERIOR COURT
YAKIMA CO. WA

SUPERIOR COURT FOR THE STATE OF WASHINGTON
COUNTY OF YAKIMA

THEODORE STRONG,

Plaintiff,

v.

NUMERICA CREDIT UNION,

Defendant.

NO. 17-2-01406-39

**AMENDED [PROPOSED] ORDER
GRANTING PLAINTIFF'S
UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS AND
SERVICE AWARD**

The Court, having considered Plaintiff's Motion for Final Approval of Class Action Settlement and Award of Attorneys' Fees, Costs and Service Award in the above-captioned matter (the "Action"), the Settlement Agreement and Release entered into between Plaintiff Theodore Strong ("Plaintiff") and Numerica Credit Union ("Defendant"), the lack of objections to and requests for exclusion from the proposed Settlement, the record in this the Action, the submissions and arguments presented by counsel, and having held a Final Approval Hearing on February 14, 2020, finds that:

1. All capitalized terms in this Final Approval Order shall have the same meanings as set forth in the Settlement Agreement.
2. The Court has jurisdiction over the subject matter of the Action and over the settling parties, including the members of the Settlement Class.

AMENDED [PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT AND
AWARD OF ATTORNEYS' FEES, COSTS AND SERVICE
AWARD - 1

CASE No. 17-2-01406-39

TERRELL MARSHALL LAW GROUP PLLC
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1 3. On October 8, 2019, the Court preliminarily approved the Settlement and
2 certified, for settlement purposes, the Class as defined in the Settlement Agreement.

3 4. Pursuant to the Court's Preliminary Approval Order, notice of the Settlement
4 was distributed to the Class by certified mail, US Mail, and email. The Court hereby finds and
5 concludes that the notice was disseminated to members of the Class in accordance with the
6 terms set forth in the Settlement and in compliance with the Court's Preliminary Approval
7 Order. The Court further finds and concludes that the notice, and the distribution procedures set
8 forth in the Settlement fully satisfy CR 23(c)(2) and (e) and the requirements of due process,
9 were the best notice practicable under the circumstances, provided individual notice to all
10 members of the Class who could be identified through reasonable effort, provided an
11 opportunity for the Class Members to object or exclude themselves from the Settlement, and
12 support the Court's exercise of jurisdiction over the Settlement Class as contemplated in the
13 Settlement Agreement and this Final Approval Order.

14 5. The Class Members were given an opportunity to object to the Settlement. No
15 Class Members objected to the Settlement and no Class Members requested exclusion from the
16 Settlement.

17 6. The Settlement was arrived at as a result of arms' length negotiations conducted
18 in good faith by experienced attorneys familiar with the legal and factual issues of this case.

19 7. The Settlement is fair, reasonable, adequate, and in the best interests of the
20 Settlement Class in light of the complexity, expense, and duration of litigation, as well as the
21 risk involved in establishing liability and damages and in maintaining the class action through
22 trial and appeal.

23 8. The consideration provided by the Settlement constitutes fair value given in
24 exchange for the release of the Released Claims against the Released Parties by Settlement
25 Class Members. The Court finds that the consideration provided to members of the Settlement
26 Class is reasonable, considering that facts and circumstances of the claims and affirmative

27 AMENDED [PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION FOR FINAL
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AWARD OF ATTORNEYS' FEES, COSTS AND SERVICE
AWARD - 2
CASE NO. 17-2-01406-39

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1 defenses asserted in the action, and the potential risks and likelihood of success of alternatively
2 pursuing trial on the merits.

3 **IT IS THEREFORE ORDERED, ADJUDGED AND DECREED THAT:**

4 9. The Settlement is finally approved as fair, reasonable, adequate, just, and in
5 compliance with all applicable requirements of the applicable laws, and in the best interest of
6 the Settlement Class. The Settlement Agreement, which shall be deemed incorporated herein,
7 and all terms of the Settlement are finally approved and shall be consummated in accordance
8 with the terms and provisions thereof, except as amended by any subsequent order issued by
9 the Court.

10 10. Pursuant to CR 23(c)(3), the Action is hereby certified, for settlement purposes
11 only, as a class action on behalf of the following Settlement Class Members: All persons who:

- 12 (a) resided in Washington state when they purchased or otherwise financed a vehicle
13 primarily for personal, family, or household use;
14 (b) whose contract was assigned to Defendant or financing was provided by Defendant;
15 and
16 (c) to whom Defendant issued or failed to issue a Notice of Intent to Sell, pursuant to
17 RCW 62A.9A-614 during the period April 14, 2015 through May 17, 2017 and/or to
18 whom Defendant issued or failed to issue a Notice of Deficiency, pursuant to RCW
19 62A.9A- 616, during the period April 14, 2015 through July 31, 2018.

20 Excluded from the class are all persons who (a) filed for bankruptcy protection as to their
21 Numerica auto loan and whose bankruptcy case was not dismissed or otherwise closed as of the
22 date of this Settlement Agreement; or (b) against whom Defendant's assignee obtained a
23 judgment to collect on their Deficiency Balance before May 20, 2019, which judgments are
24 held by unrelated third party debt collectors.

25 11. The Plaintiff and each Settlement Class Member, their respective heirs,
26 executors, administrators, representatives, agents, attorneys, partners, affiliates, successors,
27 predecessors-in-interest, and assigns are deemed to have released, waive, acquitted, and
discharged forever each of the Released Parties from each of the Released Claims, as defined in
the Settlement Agreement. The Released Claims are compromised, settled, released,

AMENDED [PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION FOR FINAL
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AWARD - 3

CASE No. 17-2-01406-39

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1 discharged, and dismissed with prejudice by virtue of these proceedings and this Final
2 Approval Order, provided, however, that the Released Claims shall not be construed to limit
3 the right of Defendant or any member of the Settlement Class to enforce the terms of the
4 Settlement.

5 12. This Final Approval Order is binding on all Settlement Class Members.

6 13. To the extent permitted by law and without affecting the other provisions of this
7 Final Approval Order, this Final Approval Order is intended by the parties and the Court to be
8 *res judicata* and to prohibit and preclude any prior, concurrent, or subsequent litigation brought
9 individually, or in the name of, and/or otherwise on behalf of, Plaintiff or any Settlement Class
10 Member with respect to the Released Claims based upon the same alleged facts.

11 14. The Court retains continuing and exclusive jurisdiction over the parties and all
12 matters relating to the Action and Settlement, including the administration, interpretation,
13 construction, effectuation, enforcement, and consummation of the Settlement, including its
14 injunctive provisions, and this Final Approval Order..

15 15. This Final Approval Order is not, and shall not be construed as, an admission by
16 Defendant of any liability or wrongdoing in this or in any other proceeding.

17 16. The Court approves Class Counsel's application for \$348,540.51 in attorneys'
18 fees and \$18,126.16 in costs, which, together, represents one-third of the Settlement Fund.

19 17. The Settlement created a common fund for the benefit of Settlement Class
20 Members. Accordingly, the Court finds that the percentage of the fund method is the
21 appropriate method to use in determining the appropriate fee award in this case. *Bowles v.*
22 *Wash. Dep't of Ret. Sys.*, 121 Wn.2d 52, 72, 847 P.2d 440 (1993).

23 18. Class Counsel obtained an excellent result for the Settlement Class. Class
24 Counsel's work lead to the creation of a \$1.1 million common fund from which Settlement
25 Class Members whose statutory damages under the UCC are greater than their remaining
26 Deficiency Balance will receive cash payments. The Settlement benefits also include

27 AMENDED [PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION FOR FINAL
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AWARD - 4
CASE No. 17-2-01406-39

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1 Numerica’s agreement to request permanent deletion of the “tradeline” for Settlement Class
2 Members’ Numerica auto loans their credit reports and Numerica’s dismissal all pending legal
3 actions to collect those Deficiency Balances. Numerica also agrees to permanently cease
4 collection of all remaining Deficiency Balances of the Settlement Class Members whose
5 statutory damages are less than their Deficiency Balance or who do not have statutory
6 damages—which amounts to approximately \$8,330,822.93 in debt waiver. However, if a
7 Settlement Class Member brings any claim against Numerica that is not subject to the Release,
8 Numerica may assert that the Settlement Class Member’s Deficiency Balance is an offset to
9 that claim.

10 19. An attorneys’ fee and cost award equal to one-third of a common fund is
11 appropriate in this case and is in line with cases litigated under the UCC and attorneys’ fees and
12 costs awarded by Washington courts. *See* Final Judgment Approving Settlement and Certifying
13 Settlement Class at 6, *Gales v. Capital One*, Case No. 8:13-cv-01624-WGC (D. Md. August 5,
14 2015), ECF No. 78 (approving fee award of one-third in UCC class action); Final Judgment,
15 *Smith v. Toyota Motor Credit Corporation*, Case No. 12-02029-WDQ (D. Md. Oct. 2, 2014),
16 ECF No. 53 (approving fee award of 49% in UCC class action); *see also A.M. v. Moda Health*
17 *Plan, Inc.*, C 14-1191 TSZ, 2015 WL 9839771, at *3 (W.D. Wash. Nov. 3, 2015) (awarding fee
18 of 35% of settlement fund); Order Approving Award of Attorneys’ Fees and Costs, *Terrell v.*
19 *Costco Wholesale Corp.*, No. 16-2-10140-1 SEA, (King Cty. Sup. Ct. June 19, 2018) (awarding
20 one-third of fund in class action under the Fair Credit Reporting Act).

21 20. The Court approves a service award to the Named Plaintiff in the amount of
22 \$10,000, to be paid from the Settlement Fund. This amount is reasonable in light of Plaintiff’s
23 efforts in this case, which included assisting his counsel with the investigation of his claims,
24 responding to written discovery, being deposed, and assisting with settlement negotiations.

25 21. The Court further approves and authorizes the deduction of an amount not to
26 exceed \$29,500 from the Settlement Fund to cover the Class Administrator’s costs.

27 AMENDED [PROPOSED] ORDER GRANTING
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AWARD OF ATTORNEYS’ FEES, COSTS AND SERVICE
AWARD - 5
CASE NO. 17-2-01406-39

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1 22. The attorneys' fees and costs, service award, and settlement administration costs
2 are to be deducted from the Settlement Fund as set forth in the Settlement Agreement. Except
3 as expressly set forth to the contrary in this Final Approval Order, Plaintiff and Class Counsel
4 shall take nothing by their claims and each party shall bear his or its own fees, costs, and
5 expenses in connection with this Action. Except for the award to Class Counsel specified
6 above, no fees or funds shall be paid to any other counsel representing any Settlement Class
7 Members.

8 23. The Court dismisses the Action against Defendant, including all claims against
9 Defendant, with prejudice, without costs to any party, except as expressly provided for in the
10 Settlement.

11 24. Finding that there is no just reason for delay, the Court orders that this Final
12 Approval Order shall constitute a final judgment pursuant to CR 58 that is binding on the
13 settling parties and the Settlement Class.

14 IT IS HEREBY ORDERED.

15 DATED this 14 day of FEB, 2020.

16
17
18


19 _____
SUPERIOR COURT JUDGE

20 Blaine G. Gibson

21 Judge

22
23
24
25
26
27 AMENDED [PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT AND
AWARD OF ATTORNEYS' FEES, COSTS AND SERVICE
AWARD - 6
CASE No. 17-2-01406-39

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Presented by:

TERRELL MARSHALL LAW GROUP PLLC



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AMENDED [PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT AND
AWARD OF ATTORNEYS' FEES, COSTS AND SERVICE
AWARD - 7
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