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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 VALERIE L. COLLINS IN
SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS AND SERVICE
AWARDS**

22 I, Valerie L. Collins, declare as follows:

23 **A. Background and experience**

- 24 1. I am an attorney with Towards Justice, co-counsel for this case.
- 25 2. Towards Justice is a nonprofit law firm that represents workers in litigation and
26 other advocacy to build worker power and advance economic justice. Towards Justice has
27 served as co-lead counsel in numerous class and collective actions.

1 3. I have been a member of the Maryland State Bar since 2010 and a member of
2 the Colorado State Bar since 2021.

3 4. I have also been admitted to practice before the United States District Courts for
4 the District of Columbia, the District of Colorado, the Eastern District of New York, and the
5 Southern District of Ohio, as well as the United States Court of Appeals for the District of
6 Columbia, Second, Sixth, Eighth, and Eleventh Circuits.

7 5. I received my J.D. from the Howard University School of Law in 2009, where I
8 served as Editor-in Chief of the Howard Law Journal and was an executive board member of
9 OUTlaw, the American Constitution Society, and the American Civil Liberties Union.

10 6. Following law school, I completed a one-year clerkship for the United States
11 District Court for the District of Columbia and a one-year clerkship for the Fourth Circuit Court
12 of Appeals.

13 7. Prior to joining Towards Justice in 2020, I worked as an attorney in the Appellate
14 and Supreme Court Litigation Branch at the National Labor Relations Board. Prior to the
15 National Labor Relations Board, I was a litigation associate at the international law firm Jones
16 Day.

17 8. I am counsel of record in the following cases, many of which are putative or
18 certified class and collective actions: *Cross et al v. Amazon.com Inc et al*, 1:23-cv-02099-NYW-
19 SBP (D. Colo.); *Miclat v. Advanced Care Staffing, LLC et al*, 1:23-cv-05296-NRM-MMH
20 (E.D.N.Y.); *Transport Workers Union of America, AFL CIO, Local 556 v. Southwest Airlines Co.*,
21 1:23-cv-01403-NYW-MEH (D. Colo.); *Food and Water Watch v. Smithfield Foods*, 1:21-cv-
22 02065-CRC (D. D.C.); *Feltner et al v. Dragonfly Entertainment Group*, 1:21-cv-03052-LTB-STV
23 (D. Colo.); *Palmer v. Amazon*, 1:20-cv-02468-BMC (E.D.N.Y.); *Carmen v. Health Carousel*, 1:20-
24 cv-00313-DRC (S.D. Ohio); *Colorado Jobs with Justice et al v. Jared Polis*, 2022CV030353 (Colo.
25 Dist. Ct.); and *Bourgoyne v. Total Beverage*, 2023CV030499 (Colo. Dist. Ct.).
26
27

1 9. Other cases in which Towards Justice has been appointed class counsel include
2 *Menocal, et al. v. The GEO Group, Inc.*, No. 14-cv-2887 (D. Colo), *Fuchs, et al. v. SpecialtyCare,*
3 *Inc.*, No. 23-cv-892 (M.D. Tenn.), *Burrell, et al. v. Loungo et al.*, No. 14-cv-1891 (M.D. Pa.).

4 Additional information about class actions litigated by Towards Justice is available on our
5 website: www.towardsjustice.org.

6
7 **B. Qualifications of other Towards Justice attorneys**

8 10. Juno Turner is the Litigation Director at Towards Justice. She is an experienced
9 plaintiff-side employment litigator who has represented thousands of workers in class and
10 collective actions involving wage theft and other exploitative workplace practices. Prior to
11 joining Towards Justice in 2019, Turner was a partner at Outten & Golden, LLP, where she
12 worked on complex workers' rights litigation. Earlier in her career, she served as an Assistant
13 Attorney General in the Labor Bureau of the New York State Attorney General's Office and
14 clerked for the United States District Court for the Eastern District of New York. Turner is a 2006
15 graduate of Fordham University School of Law.

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17
18 11. David Seligman is the Executive Director of Towards Justice. He has represented
19 thousands of workers and consumers in class and collective actions involving wage theft,
20 anticompetitive conduct, discrimination, and other work-related and consumer claims. Prior to
21 becoming Executive Director in 2019, Seligman served as Litigation Counsel at Towards Justice.
22 Earlier in his career, he was an attorney at the National Consumer Law Center, where he
23 focused on forced arbitration and authored model legislation aimed at protecting workers and
24 consumers from abusive arbitration practices. Seligman also clerked for the United States
25 District Court for the District of Massachusetts and the United States Court of Appeals for the
26 Second Circuit. Seligman is a 2010 graduate of Harvard Law School.

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

2 12. 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 13. During the spring and summer of 2024, the parties engaged in written discovery.
7 The parties provided written interrogatory responses and produced documents.

8 14. 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 15. Plaintiffs deposed two designated representatives of Defendant Bright Horizons
12 on April 17, 2025.

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

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

17 18. 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 19. 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 20. 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 21. 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 information included in
4 the complaint, helped counsel respond to discovery, discussed settlement proposals with Class
5 Counsel and approved the Settlement, and attended the full-day mediation in October 2025.
6 Ms. Chavez provided information included in the amended complaint, helped counsel respond
7 to discovery, discussed settlement proposals with Class Counsel and approved the Settlement.
8 Ms. Rutter and Ms. Chavez were both deposed and prepared to testify at trial. They have been,
9 and continue to be, willing to step forward and represent the proposed class members'
10 interests.

11 22. Since the beginning of this case, Towards Justice has worked with no guarantee
12 of being compensated for its time and efforts. Payment of Towards Justice's fees has always
13 been contingent on successfully obtaining relief for the Class Representatives and Class
14 Members. As a result, there was a substantial risk of non-payment, particularly considering the
15 challenges inherent in this type of case. Work on this case has necessarily been to the exclusion
16 of work on other matters that likely would have generated fees.

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

20 24. The work performed by Towards Justice's legal assistant was work that I or an
21 attorney would have had to perform absent such assistance. Deborah Schaffer's work required
22 an understanding of the facts and claims at issue in the case and was important to the
23 development of those facts and claims.

24 25. The following table identifies the attorneys and staff members from Towards
25 Justice who worked on this case and for whom the recovery of fees is sought. For each of the
26 timekeepers below I have stated the current hourly rate, the number of hours worked through
27 April 21, 2026, and the total amount of fees. These summaries are taken from

1 contemporaneous, daily time reports prepared and maintained by Towards Justice in the
2 regular course of business, attached as Exhibit A.

3	NAME AND POSITION	RATE/PRICE	HOURS BILLED/UNITS	TOTAL/VALUE
4	ATTORNEYS			
5	David Seligman	\$700	11.9	\$8330.00
6	Executive Director			
7	J.D. from Harvard Law School, 2010			
8	Juno Turner	\$700	8.8	\$6160.00
9	Litigation Director			
10	J.D. from Fordham Law School, 2006			
11	Valerie Collins	\$700	126.1	\$88270.00
12	Attorney			
13	J.D. from Howard University School of Law, 2009			
14	LEGAL ASSISTANT			
15	Deborah Schaffer	\$125	5.7	\$712.50
16	Legal Assistant			
17	TOTAL:	152.5		\$103,472.50

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

23 27. The lodestar calculations of Class Counsel are based on reasonable hourly rates.
24 Class Counsel set their rates for attorneys and staff members based on a variety of factors,
25 including among others: the experience, skill and sophistication required for the types of legal
26 services typically performed; the rates customarily charged in the markets where legal services

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

3 28. Towards Justice has incurred out-of-pocket litigation expenses totaling
4 \$6,225.42, to cover expenses related to travel, and expert and transcription fees.

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Category of Expense	Total
Travel	\$917.47
Expert	\$4,627.00
Transcripts	\$680.95
TOTAL	\$6,225.42

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12 29. Pursuant to the Court-approved Notice Plan, Settlement Class Members were
13 advised that Class Counsel intended to seek an award of attorneys' fees and costs and service
14 awards for the Class Representatives. As of the date of this Declaration, no Settlement Class
15 Member has objected to Class Counsel's intention to request attorneys' fees, costs, or service
16 awards.

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

19 EXECUTED at Ashton, Maryland and DATED this 18th day of May, 2026.

20 By: /s/ Valerie L. Collins
21 Valerie L. Collins, *Admitted Pro Hac Vice*

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.

One Union Square

9 600 University Street, Suite 3200

Seattle, Washington 98101

10 Telephone: (206) 623-3300

11 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
18 Toby J. Marshall, WSBA #32726

- Exhibit A -

Towards Justice Fees

Date	Client	Project	Task	Notes	Hours	Hours Rounded	First Name	Last Name	Billable Rate	Billable Amount
12/7/2021	Bright Horizons	Rutter (3231)	Meeting	Meet with potential client regarding potential claims, factual background, and litigation strategy.	0.6	0.6	David	Seigman	\$ 700	\$ 420.00
12/7/2021	Bright Horizons	Rutter (3231)	Meeting	Meet with potential client Rutter regarding potential claims, factual background, and litigation strategy.	0.6	0.6	Valerie	Collins	\$ 700	\$ 420.00
2/16/2022	Bright Horizons	Rutter (3231)	Meeting	Meet with co-counsel regarding case viability, jurisdictional considerations, and litigation approach	1	1	David	Seigman	\$ 700	\$ 700.00
2/16/2022	Bright Horizons	Rutter (3231)	Meeting	Meet with co-counsel regarding case viability, jurisdictional considerations, and litigation approach	1	1	Valerie	Collins	\$ 700	\$ 700.00
3/22/2022	Bright Horizons	Rutter (3231)	Meeting	Prepare for and meet with co-counsel regarding case logistics	1	1	David	Seigman	\$ 700	\$ 700.00
3/22/2022	Bright Horizons	Rutter (3231)	Meeting	Prepare for and meet with co-counsel regarding case logistics	1	1	Valerie	Collins	\$ 700	\$ 700.00
4/13/2022	Bright Horizons	Rutter (3231)	Meeting	Meet with co-counsel regarding claim development and factual support	1	1	Valerie	Collins	\$ 700	\$ 700.00
5/6/2022	Bright Horizons	Rutter (3231)	Meeting	Meet with client re factual development.	0.5	0.5	David	Seigman	\$ 700	\$ 350.00
5/6/2022	Bright Horizons	Rutter (3231)	Meeting	Meet with C. Rutter regarding pre-filing investigation and legal theories	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
5/18/2022	Bright Horizons	Rutter (3231)	Meeting	Strategy meeting with co-counsel	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
6/30/2022	Bright Horizons	Rutter (3231)	Meeting	Strategy meeting with co-counsel regarding complaint	0.7	0.7	Valerie	Collins	\$ 700	\$ 490.00
8/24/2022	Bright Horizons	Rutter (3231)	Meeting	Meeting with co-counsel and client re complaint	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
9/30/2022	Bright Horizons	Rutter (3231)	Draft	Draft complaint	3.5	3.5	Valerie	Collins	\$ 700	\$ 2,450.00
12/1/2022	Bright Horizons	Rutter (3231)	Review	Review draft complaint.	1	1	David	Seigman	\$ 700	\$ 700.00
12/1/2022	Bright Horizons	Rutter (3231)	Review	Finalizing complaint for filing	2	2	Valerie	Collins	\$ 700	\$ 1,400.00
12/1/2022	Bright Horizons	Rutter (3231)	Meeting	Communicate with co-counsel regarding filing logistics	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
1/4/2023	Bright Horizons	Rutter (3231)	Meeting	Meeting with co-counsel and client re next steps	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
2/28/2023	Bright Horizons	Rutter (3231)	Meeting	Prepare for and confer with opposing counsel regarding upcoming motion to dismiss and litigation posture and follow up work regarding the same	1	1	Valerie	Collins	\$ 700	\$ 700.00
3/7/2023	Bright Horizons	Rutter (3231)	Meeting	Meeting with co-counsel to discuss motion to dismiss and briefing strategy	0.8	0.8	Valerie	Collins	\$ 700	\$ 560.00
3/21/2023	Bright Horizons	Rutter (3231)	Meeting	Prepare for and participate in Rule 26(f) conference; confer with opposing counsel about discovery and follow up work regarding the same	1	1	Valerie	Collins	\$ 700	\$ 700.00
3/27/2023	Bright Horizons	Rutter (3231)	Draft	Draft response to motion to dismiss	3.5	3.5	Valerie	Collins	\$ 700	\$ 2,450.00
3/29/2023	Bright Horizons	Rutter (3231)	Draft	Draft response to motion to dismiss	4	4	Valerie	Collins	\$ 700	\$ 2,800.00
3/29/2023	Bright Horizons	Rutter (3231)	Review	Review draft response to motion to dismiss.	1	1	David	Seigman	\$ 700	\$ 700.00
4/3/2023	Bright Horizons	Rutter (3231)	Draft	Finalize response to motion to dismiss; incorporate edits from co-counsel	2	2	Valerie	Collins	\$ 700	\$ 1,400.00
4/7/2023	Bright Horizons	Rutter (3231)	Review	Review defendants reply in support of motion to dismiss	1.5	1.5	Valerie	Collins	\$ 700	\$ 1,050.00
4/7/2023	Bright Horizons	Rutter (3231)	Meeting	Meeting with co-counsel regarding defendant's reply brief	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
4/20/2023	Bright Horizons	Rutter (3231)	Review	Review joint status report and coordinate with co-counsel regarding revisions	0.8	0.8	Valerie	Collins	\$ 700	\$ 560.00
6/26/2023	Bright Horizons	Rutter (3231)	Meeting	Prepared for and attended meeting re discovery schedule, potential additional claims.	0.5	0.5	June	Turner	\$ 700	\$ 350.00
6/26/2023	Bright Horizons	Rutter (3231)	Meeting	Prepare for and meet with client regarding litigation strategy	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
7/20/2023	Bright Horizons	Rutter (3231)	Correspondence	Review correspondence re extension of deadlines.	0.1	0.1	June	Turner	\$ 700	\$ 70.00
12/19/2023	Bright Horizons	Rutter (3231)	Meeting	Meeting with David and Valerie re oral argument prep.	0.5	0.5	June	Turner	\$ 700	\$ 350.00
12/21/2023	Bright Horizons	Rutter (3231)	Research	Prepare for oral argument	4	4	Valerie	Collins	\$ 700	\$ 2,800.00
1/4/2024	Bright Horizons	Rutter (3231)	Meeting	Meeting with Valerie, David, co-counsel re preparation for oral argument.	1.3	1.3	June	Turner	\$ 700	\$ 910.00
1/4/2024	Bright Horizons	Rutter (3231)	Meeting	Participate in moot argument session with co-counsel; refine oral argument strategy	1.5	1.5	Valerie	Collins	\$ 700	\$ 1,050.00
1/4/2024	Bright Horizons	Rutter (3231)	Meeting	Participate in moot re motion to dismiss.	1.5	1.5	David	Seigman	\$ 700	\$ 1,050.00
1/5/2024	Bright Horizons	Rutter (3231)	Review	Review briefing and make notes re oral argument strategy.	0.9	0.9	June	Turner	\$ 700	\$ 630.00
1/5/2024	Bright Horizons	Rutter (3231)	Meeting	teleconference with David re same.	0.8	0.8	June	Turner	\$ 700	\$ 560.00
1/9/2024	Bright Horizons	Rutter (3231)	Court time	Participate in oral argument regarding a motion to dismiss	1.5	1.5	Valerie	Collins	\$ 700	\$ 1,050.00
3/5/2024	Bright Horizons	Rutter (3231)	Correspondence	Correspond with team re change court hearing date.	0.1	0.1	June	Turner	\$ 700	\$ 70.00
3/14/2024	Bright Horizons	Rutter (3231)	Review	Review draft motion to state trial date	0.6	0.6	Valerie	Collins	\$ 700	\$ 420.00
3/14/2024	Bright Horizons	Rutter (3231)	Correspondence	Meet with co-counsel regarding scheduling issues	0.2	0.2	Valerie	Collins	\$ 700	\$ 140.00
4/11/2024	Bright Horizons	Rutter (3231)	Draft	Prepare pro hac vice motion	0.4	0.4	Valerie	Collins	\$ 700	\$ 280.00
4/15/2024	Bright Horizons	Rutter (3231)	Correspondence	Correspond with team re opposition to motion to dismiss.	0.2	0.2	June	Turner	\$ 700	\$ 140.00

Towards Justice Fees

Date	Client	Project	Task	Notes	Hours	Hours Rounded	First Name	Last Name	Billable Rate	Billable Amount
4/15/2024	Bright Horizons	Rutter (3231)	Draft	Draft response to motion to dismiss; revise based on co-counsel feedback	5.5	5.5	Valerie	Collins	\$ 700	\$ 3,850.00
4/26/2024	Bright Horizons	Rutter (3231)	Meeting	Call with co-counsel to discuss motion to dismiss hearing and next steps and follow up work regarding the same	0.2	0.2	Valerie	Collins	\$ 700	\$ 140.00
4/30/2024	Bright Horizons	Rutter (3231)	Meeting	Prepare for and meet with co-counsel regarding litigation posture and discuss potential class members	1	1	Valerie	Collins	\$ 700	\$ 700.00
5/8/2024	Bright Horizons	Rutter (3231)	Investigation	Meet with case investigator regarding potential plaintiffs	0.6	0.6	Valerie	Collins	\$ 700	\$ 420.00
5/10/2024	Bright Horizons	Rutter (3231)	Correspondence	Discuss potential class members	1.07	1.1	Deb	Schaffer	\$ 125	\$ 137.50
5/15/2024	Bright Horizons	Rutter (3231)	Meeting	Meet with client regarding case progression and potential complaint amendment	1	1	Valerie	Collins	\$ 700	\$ 700.00
5/30/2024	Bright Horizons	Rutter (3231)	Correspondence	Correspondence with team	0.67	0.7	Deb	Schaffer	\$ 125	\$ 87.50
6/10/2024	Bright Horizons	Rutter (3231)	Correspondence	Correspond with team re amendment, discovery, calls, emails with Valerie, draft ad	0.3	0.3	Junio	Turner	\$ 700	\$ 210.00
6/11/2024	Bright Horizons	Rutter (3231)	Draft	Meet with co-counsel re amending complaint	1.12	1.2	Deb	Schaffer	\$ 125	\$ 150.00
6/12/2024	Bright Horizons	Rutter (3231)	Meeting	Meet with client regarding case posture	1	1	Valerie	Collins	\$ 700	\$ 700.00
6/12/2024	Bright Horizons	Rutter (3231)	Meeting	Meet with potential additional client regarding her facts and case strategy	0.6	0.6	Valerie	Collins	\$ 700	\$ 420.00
6/26/2024	Bright Horizons	Rutter (3231)	Draft	Meet with potential additional client regarding her facts and case strategy	1.5	1.5	Valerie	Collins	\$ 700	\$ 1,050.00
7/17/2024	Bright Horizons	Rutter (3231)	Correspondence	emails	0.2	0.2	Deb	Schaffer	\$ 125	\$ 25.00
7/18/2024	Bright Horizons	Rutter (3231)	Correspondence	texts	0.2	0.2	Deb	Schaffer	\$ 125	\$ 25.00
7/18/2024	Bright Horizons	Rutter (3231)	Draft	Draft interrogatory responses	4	4	Valerie	Collins	\$ 700	\$ 2,800.00
7/18/2024	Bright Horizons	Rutter (3231)	Meeting	Coordinate with co-counsel regarding discovery	0.6	0.6	Valerie	Collins	\$ 700	\$ 420.00
7/18/2024	Bright Horizons	Rutter (3231)	Review	Review draft discovery with client	0.6	0.6	Valerie	Collins	\$ 700	\$ 420.00
7/24/2024	Bright Horizons	Rutter (3231)	Review	Review and revise draft deficiency letter.	0.6	0.6	Junio	Turner	\$ 700	\$ 420.00
7/26/2024	Bright Horizons	Rutter (3231)	Meeting	Meet with client regarding discovery responses	1	1	Valerie	Collins	\$ 700	\$ 700.00
7/30/2024	Bright Horizons	Rutter (3231)	Meeting	Team meeting re amended complaint.	0.5	0.5	Junio	Turner	\$ 700	\$ 350.00
8/1/2024	Bright Horizons	Rutter (3231)	Meeting	Prepare for and attend meet and confer with opposing counsel regarding discovery deficiencies; meet with co-counsel regarding the same	1.5	1.5	Valerie	Collins	\$ 700	\$ 1,050.00
8/7/2024	Bright Horizons	Rutter (3231)	Meeting	Meet with client regarding discovery	0.6	0.6	Valerie	Collins	\$ 700	\$ 420.00
8/9/2024	Bright Horizons	Rutter (3231)	Meeting	Meet with client regarding discovery	1.2	1.2	Valerie	Collins	\$ 700	\$ 840.00
9/12/2024	Bright Horizons	Rutter (3231)	Meeting	Review proposed discovery responses with client	1.5	1.5	Valerie	Collins	\$ 700	\$ 1,050.00
9/25/2024	Bright Horizons	Rutter (3231)	Meeting	call	0.9	0.9	Deb	Schaffer	\$ 125	\$ 112.50
9/25/2024	Bright Horizons	Rutter (3231)	Research	Strategy call with client	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
10/3/2024	Bright Horizons	Rutter (3231)	Correspondence	scheduling	0.2	0.2	Deb	Schaffer	\$ 125	\$ 25.00
10/7/2024	Bright Horizons	Rutter (3231)	Draft	Draft and review proposed motion for leave to file an amended complaint	1.5	1.5	Valerie	Collins	\$ 700	\$ 1,050.00
10/8/2024	Bright Horizons	Rutter (3231)	Draft	Draft and edit amended complaint	1.6	1.6	Valerie	Collins	\$ 700	\$ 1,120.00
10/8/2024	Bright Horizons	Rutter (3231)	Correspondence	Coordinate with co-counsel the filing of an amended complaint	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
10/9/2024	Bright Horizons	Rutter (3231)	Review	Review amended complaint and motion to amend and correspond with team re same.	0.4	0.4	Junio	Turner	\$ 700	\$ 280.00
10/10/2024	Bright Horizons	Rutter (3231)	Correspondence	Communicate with co-counsel regarding amended complaint	0.2	0.2	Valerie	Collins	\$ 700	\$ 140.00
10/21/2024	Bright Horizons	Rutter (3231)	Draft	Draft motion to amend scheduling order	1.2	1.2	Valerie	Collins	\$ 700	\$ 840.00
12/16/2024	Bright Horizons	Rutter (3231)	Meeting	Prepare for and attend meeting with co-counsel team re discovery and depositions.	0.8	0.8	Junio	Turner	\$ 700	\$ 560.00
12/16/2024	Bright Horizons	Rutter (3231)	Meeting	Prepared for and attended meeting with co-counsel regarding case status and upcoming deadlines	0.75	0.8	Valerie	Collins	\$ 700	\$ 560.00
1/6/2025	Bright Horizons	Rutter (3231)	Correspondence	Correspond with potential expert.	0.1	0.1	Junio	Turner	\$ 700	\$ 70.00
1/8/2025	Bright Horizons	Rutter (3231)	Meeting	Meeting with co-counsel and potential expert.	0.3	0.3	Junio	Turner	\$ 700	\$ 210.00
1/14/2025	Bright Horizons	Rutter (3231)	Correspondence	Communicate with client regarding discovery prepared for and attended meeting with co counsel re discovery, class cert strategy.	0.6	0.6	Valerie	Collins	\$ 700	\$ 420.00
1/16/2025	Bright Horizons	Rutter (3231)	Meeting	prepare for and meet with co-counsel regarding discovery strategy	1	1	Junio	Turner	\$ 700	\$ 700.00
1/16/2025	Bright Horizons	Rutter (3231)	Meeting	Call with co-counsel re 30(b)(6) prep and discovery issues	1	1	Valerie	Collins	\$ 700	\$ 700.00
2/4/2025	Bright Horizons	Rutter (3231)	Meeting	Call with co-counsel re 30(b)(6) prep and discovery issues	0.2	0.2	Valerie	Collins	\$ 700	\$ 140.00
2/12/2025	Bright Horizons	Rutter (3231)	Meeting	Prepare for and meet with co-counsel regarding deposition planning and discovery issues	1	1	Valerie	Collins	\$ 700	\$ 700.00
2/21/2025	Bright Horizons	Rutter (3231)	Draft	Draft initial disclosures; coordinate with co-counsel regarding accuracy	2	2	Valerie	Collins	\$ 700	\$ 1,400.00
2/25/2025	Bright Horizons	Rutter (3231)	Meeting	Meeting with co-counsel regarding initial disclosures	1	1	Valerie	Collins	\$ 700	\$ 700.00
3/13/2025	Bright Horizons	Rutter (3231)	Meeting	Call with co-counsel re 30(b)(6) scheduling	0.2	0.2	Valerie	Collins	\$ 700	\$ 140.00
4/15/2025	Bright Horizons	Rutter (3231)	Research	Research and prepare for 30(b)(6) deposition	3	3	Valerie	Collins	\$ 700	\$ 2,100.00
4/16/2025	Bright Horizons	Rutter (3231)	Correspondence	Correspond and review 30(b)(6) outline	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00

Towards Justice Fees

Date	Client	Project	Task	Notes	Hours	Hours Rounded	First Name	Last Name	Billable Rate	Billable Amount
4/17/2025	Bright Horizons	Rutter (3231)	Deposition	Serve as lead for 30(b)(6) deposition	6	6	Valerie	Collins	\$ 700	\$ 4,200.00
4/23/2025	Bright Horizons	Rutter (3231)	Correspondence	email	0.2	0.2	Deb	Schaffer	\$ 125	\$ 25.00
4/24/2025	Bright Horizons	Rutter (3231)	Correspondence	email, text	0.2	0.2	Deb	Schaffer	\$ 125	\$ 25.00
5/12/2025	Bright Horizons	Rutter (3231)	Meeting	Meet with co-counsel regarding class certification declarations	1	1	Valerie	Collins	\$ 700	\$ 700.00
5/12/2025	Bright Horizons	Rutter (3231)	Meeting	Review motion for class certification	4	4	Valerie	Collins	\$ 700	\$ 2,800.00
5/16/2025	Bright Horizons	Rutter (3231)	Draft	Draft declarations in support of motion for class certification	2	2	Valerie	Collins	\$ 700	\$ 1,400.00
5/16/2025	Bright Horizons	Rutter (3231)	Meeting	Meet with client to prepare for upcoming deposition	1	1	Valerie	Collins	\$ 700	\$ 700.00
5/20/2025	Bright Horizons	Rutter (3231)	Correspondence	scheduling	0.2	0.2	Deb	Schaffer	\$ 125	\$ 25.00
5/21/2025	Bright Horizons	Rutter (3231)	Meeting	Meet with client to prepare for upcoming deposition	2	2	Valerie	Collins	\$ 700	\$ 1,400.00
5/22/2025	Bright Horizons	Rutter (3231)	Review	Finalize client supplemental disclosures	2	2	Valerie	Collins	\$ 700	\$ 1,400.00
5/22/2025	Bright Horizons	Rutter (3231)	Meeting	Meet with co-counsel regarding discovery disclosures	1	1	Valerie	Collins	\$ 700	\$ 700.00
5/23/2025	Bright Horizons	Rutter (3231)	Deposition	Defended client during deposition	3.5	3.5	Valerie	Collins	\$ 700	\$ 2,450.00
7/10/2025	Bright Horizons	Rutter (3231)	Review	emails	0.1	0.1	Deb	Schaffer	\$ 125	\$ 12.50
7/14/2025	Bright Horizons	Rutter (3231)	Correspondence	emails	0.1	0.1	Deb	Schaffer	\$ 125	\$ 12.50
9/3/2025	Bright Horizons	Rutter (3231)	Meeting	Met with co-counsel re mediation prep	0.4	0.4	Valerie	Collins	\$ 700	\$ 280.00
9/10/2025	Bright Horizons	Rutter (3231)	Meeting	Prepare for and meet with co-counsel and expert regarding damages models	1	1	Valerie	Collins	\$ 700	\$ 700.00
9/18/2025	Bright Horizons	Rutter (3231)	Review	Review expert damages analysis for mediation and correspond with team re same.	0.2	0.2	Junio	Turner	\$ 700	\$ 140.00
9/25/2025	Bright Horizons	Rutter (3231)	Meeting	Meet with co-counsel regarding mediation strategy	1	1	Valerie	Collins	\$ 700	\$ 700.00
9/25/2025	Bright Horizons	Rutter (3231)	Review	Review case materials in preparation for mediation	2.5	2.5	Valerie	Collins	\$ 700	\$ 1,750.00
10/8/2025	Bright Horizons	Rutter (3231)	Meeting	Prepared for and attended meeting with co-counsel regarding mediation	1	1	Valerie	Collins	\$ 700	\$ 700.00
10/9/2025	Bright Horizons	Rutter (3231)	Meeting	Participate in mediation.	4.5	4.5	David	Seligman	\$ 700	\$ 3,150.00
10/9/2025	Bright Horizons	Rutter (3231)	Meeting	Prepare for and participate in mediation along with co-counsel and client	9	9	Valerie	Collins	\$ 700	\$ 6,300.00
10/12/2025	Bright Horizons	Rutter (3231)	Correspondence	Correspond with co-counsel re settlement terms.	0.25	0.3	David	Seligman	\$ 700	\$ 210.00
10/13/2025	Bright Horizons	Rutter (3231)	Correspondence	Correspond with opposing counsel regarding settlement terms	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
10/15/2025	Bright Horizons	Rutter (3231)	Meeting	Meet with co-counsel regarding settlement terms	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
10/16/2025	Bright Horizons	Rutter (3231)	Correspondence	Correspond with opposing counsel regarding settlement terms	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
10/22/2025	Bright Horizons	Rutter (3231)	Correspondence	Correspond with opposing counsel regarding settlement terms	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
10/23/2025	Bright Horizons	Rutter (3231)	Meeting	Meeting with co-counsel re settlement confidentiality terms.	0.5	0.5	David	Seligman	\$ 700	\$ 350.00
10/23/2025	Bright Horizons	Rutter (3231)	Meeting	Meet with co-counsel regarding confidentiality terms	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
10/24/2025	Bright Horizons	Rutter (3231)	Review	Review proposed confidentiality settlement terms	0.25	0.3	Valerie	Collins	\$ 700	\$ 210.00
10/27/2025	Bright Horizons	Rutter (3231)	Meeting	Meet with co-counsel regarding settlement terms	0.25	0.3	Valerie	Collins	\$ 700	\$ 210.00
10/27/2025	Bright Horizons	Rutter (3231)	Review	Review proposed confidentiality settlement terms	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
10/29/2025	Bright Horizons	Rutter (3231)	Correspondence	Correspond with opposing counsel regarding settlement terms	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
10/31/2025	Bright Horizons	Rutter (3231)	Meeting	Met with co-counsel re settlement issues	0.7	0.7	Valerie	Collins	\$ 700	\$ 490.00
11/3/2025	Bright Horizons	Rutter (3231)	Correspondence	Correspond with opposing counsel regarding settlement terms	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
11/3/2025	Bright Horizons	Rutter (3231)	Meeting	Meet with co-counsel regarding settlement terms	0.25	0.3	Valerie	Collins	\$ 700	\$ 210.00
11/3/2025	Bright Horizons	Rutter (3231)	Review	Review revised confidentiality settlement terms	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
11/3/2025	Bright Horizons	Rutter (3231)	Review	Review updated settlement terms	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
11/26/2025	Bright Horizons	Rutter (3231)	Review	Review revised settlement terms	0.25	0.3	Valerie	Collins	\$ 700	\$ 210.00
11/27/2025	Bright Horizons	Rutter (3231)	Correspondence	Confer with opposing counsel regarding settlement confidentiality terms	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
12/3/2025	Bright Horizons	Rutter (3231)	Meeting	Meet with clients about settlement logistics	2	2	Valerie	Collins	\$ 700	\$ 1,400.00
12/4/2025	Bright Horizons	Rutter (3231)	Review	Review settlement terms with client	1	1	Valerie	Collins	\$ 700	\$ 700.00
12/5/2025	Bright Horizons	Rutter (3231)	Correspondence	settlement	0.2	0.2	Deb	Schaffer	\$ 125	\$ 25.00
1/26/2026	Bright Horizons	Rutter (3231)	Correspondence	Correspond with co-counsel regarding settlement execution email, documents	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
1/27/2026	Bright Horizons	Rutter (3231)	Review	Review motion for preliminary approval	0.2	0.2	Deb	Schaffer	\$ 125	\$ 25.00
2/19/2026	Bright Horizons	Rutter (3231)	Draft	Draft declaration in support of preliminary approval	2	2	Valerie	Collins	\$ 700	\$ 1,400.00
4/13/2026	Bright Horizons	Rutter (3231)	Correspondence	Correspondence re payment reminder, expert bill	0.2	0.2	Junio	Turner	\$ 700	\$ 140.00
4/13/2026	Bright Horizons	Rutter (3231)	Correspondence	Correspond with co-counsel regarding case logistics and timelines	0.5	0.5	Valerie	Collins	\$ 700	\$ 350.00
						152.5			\$	\$ 103,472.50