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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 IA BROWN, an individual, on behalf of
16 herself, all others similarly situated, and
17 the general public,

18 Plaintiff,

19 v.

20 AUDIOLOGY DISTRIBUTION, LLC, a
21 Delaware limited liability company;
22 CRAIG CAMERON, an individual;
23 HEARX WEST, INC., A California
24 corporation; STEVE MAHON, an
25 individual; TINO SCHWEIGHOEFER, an
26 individual; HEARX WEST LLC, a
27 Delaware limited liability company; WS
AUDIOLOGY (CALIFORNIA), PC, A
California professional corporation;
SIVANTOS, INC., a Delaware
corporation; and DOES 1 to 100,
inclusive,

Defendants.

Case No. 2:22-cv-04271-DMG-MRW

**DECLARATION OF PAUL T.
CULLEN IN SUPPORT OF MOTION
FOR APPROVAL OF CLASS
COUNSEL'S FEES**

DATE: December 6, 2024

TIME: 10:00 AM

LOCATION: Courtroom 8C, 8th Floor

Case Filed: June 22, 2022

1
2 I, Paul T. Cullen, hereby declare:

3 1. I have personal knowledge regarding the facts set forth in this declaration, and if
4 called upon to testify to the same, I could and would do so both competently and
5 truthfully.

6 2. I am Class Counsel for the settlement class in this case.

7 3. Before filing this motion, I engaged in a pre-filing conference with my opposing
8 counsel pursuant to LR 7-3 on multiple occasions, including, but not limited to April
9 23, 2024.

10 4. At the hearing on the motion for preliminary approval, the Court indicated that,
11 in the motion for attorney's fees, the Court wanted Plaintiff to provide a lodestar
12 analysis as a crosscheck on the percentage fee award requested.

13 **My Lodestar:**

14 5. My lodestar is \$362,230.00, and it is based on 299.3 hours of attorney time
15 already incurred, plus an additional estimated 30 hours through the conclusion of this
16 case, which are billed at \$1,100 per hour.

17 6. To reach the amount of fees requested in this case, which is precisely 1/3 of the
18 gross settlement amount, or \$600,000.00, one only needs to apply a modest multiplier
19 of 1.66 to reach that amount.

20 7. There are still two weeks still left for the submission of claims, opt outs, and/or
21 objections, and as of today 7.87 percent of FLSA collective class members
22 (approximately 81 out of 1029 FLSA collective class members) have submitted claims.

23 8. Having been engaged in class action litigation for 26 years on behalf of employee
24 plaintiffs starting back in 1998, which was two years after I began practicing law, it is
25 my understanding that FLSA opt in rates are typically below 10%. As such, the current
26 claims rate is exactly as one would expect it in a case such as this.

1 9. What is more, to date, there are zero opt outs, although I have been apprised by
2 my opposing counsel that there are 2 individuals who are presently represented by
3 separate counsel, and who are likely to opt out.

4 10. I have already spent at least 299.3 hours in the prosecution of this case.

5 11. I will undoubtedly spend dozens more hours in the briefing of final approval and
6 in the further administration of this case. I conservatively estimate that I will spend at
7 least 30 additional hours working on this case.

8 12. In support of my assertion that I have worked 299.3 hours, I provide my billing
9 entries, which are found in **Exhibit 1** hereto.

10 13. **Exhibit 1** is a spreadsheet I created from my electronic time keeping system,
11 which I have used for years to contemporaneously record my hours worked.

12 14. Time entries are recorded to the closest one-tenth of an hour or six minutes, and
13 they contain detailed activity descriptions and utilize ABA approved billing codes from
14 its litigation billing code set.

15 15. They reflect my activities in this case, which I can confirm were directly and
16 reasonably related to the advancement of the class' claims herein.

17 16. I am familiar with the rates charged by plaintiff employment attorneys in Los
18 Angeles and throughout California, and the contingent fee rate is typically 40% or
19 higher for the prosecution of employment matters, even when it comes to representing
20 large groups of employees. As such, a fee award of one third of the consideration
21 provided in settlement of a case is not excessive, and is, quite frankly, substantially less
22 than the typical rate charged for representation in such cases.

23 **My Rate:**

24 17. My rate is \$1,100/hour.

25 18. I believe that my rate is reasonable considering my skills, employment litigation
26 experience, reputation, and fee awards to other attorneys of similar experience in
27 California.

1 19. I have been a licensed attorney and practicing law since 1996. I became a member
2 of the bar of the State of Oregon, Washington, and California, all within one year, and
3 I have remained an active member of those state bars ever since, handling litigation and
4 fora throughout all three states.

5 20. I am also the founder and principal of the Cullen Law Firm, APC, and, while I
6 am presently a sole practitioner, I have, in the past, employed several associates.

7 21. During my career, I have obtained judgments and verdicts in excess of \$75
8 million for my clients, with the largest being a \$38 million judgment from a wage and
9 hour class settlement.

10 22. I have also been awarded fees, albeit at slightly lower rates, over the past few
11 years.

12 23. For example, the Hon. David S. Cunningham approved my fee application at
13 \$950.00 per hour in the matter of *Backhaus et al. v. The Langham Huntington Hotel*,
14 LASC Case no. 19STCV24251.

15 24. In the process of researching and drafting this motion, I concluded after
16 reviewing Chief Judge Vaughn R. Walker's decision, discussed below, that my rate
17 should be increased to properly reflect the fees charged by attorneys with my experience
18 here in Los Angeles.

19 25. I know that my opposing counsel on several cases I have handled over the past
20 several years have submitted representations to courts that they charge \$1000 per hour
21 and more, and that is for fees that are not contingent upon success, as are mine.

22 26. I attach for the Court's consideration as **Exhibit 2**, which is a copy of the current
23 Laffey Matrix, which I obtained from <http://www.laffeymatrix.com/see.html>.

24 27. As Chief Judge Vaughn R. Walker found in *In re Chiron Corp. Securities*
25 *Litigation, supra*, 2007 WL at p. at *6, the *Laffey* rates must be increased by 4.6% to
26 account for locality pay differential in Los Angeles.

27 28. The Laffey Matrix presently provides that attorneys in Washington, D.C. with
28 20+ years of practice bill at an average of \$1,057 per hour.

1 29. Increasing this figure by 4.6 percent, as Judge Walker did to account for the Los
2 Angeles locality pay differential, results in a rate of \$1,105.62 for Los Angeles attorneys
3 with 20+ years of practice.

4 30. The requested rate here, i.e., \$1,100 per hour, for a Los Angeles litigator like me,
5 who is in his 28th year of practice, is slightly lower than the rate in the *Laffey* Matrix, as
6 adjusted for Los Angeles.

7 **Additional Factors Supporting the Fee Award:**

8 31. This Settlement provides substantial relief to all class members without the delay
9 and risks associated with certification, trial, appeal, and collection.

10 32. I have 26 years of experience successfully prosecuting class actions.

11 33. I have been litigating class actions on behalf of plaintiffs since 1998, and I have
12 successfully obtained verdicts and settlements in cases exceeding \$75 million,
13 predominantly while working as a sole practitioner.

14 34. I have been certified as class counsel in dozens of cases, several of which certified
15 in contested hearings.

16 35. I have never been held to be inadequate Class Counsel.

17 36. Due to my experience, I was able to carefully assess the propriety of the proposed
18 Settlement herein.

19 37. I was also able to ensure that this case was properly prosecuted from the outset,
20 yielding a prompt and exceptional result for the Classes and Subclasses.

21 38. As was explained in my declaration in support of preliminary approval, this
22 settlement represents 102% of the projected value of the case, before adding attorney's
23 fees and costs.

24 39. At the hearing on Plaintiff's motion for Preliminary Approval, I noted that this
25 Court acknowledged this exceptional result, and that it was obtained by the efficient,
26 skilled, and diligent work of counsel.

27 40. I have no conflicts with the Classes or Subclasses.

1 41. Moreover, I am not a relative of the Plaintiff, and I have no financial interest in
2 the proposed Claims Administrator. These basic factors favor the award requested, but
3 there are several more.

4 42. **Results Achieved:** Here, I believe that the exceptional results obtained through
5 early settlement warrant an award of one third of the Settlement fund for attorney's fees.

6 43. In researching the cases cited in this motion, it is obvious that counsel cases that
7 obtained far less impressive results have been awarded one third of the gross amount of
8 the settlement as a fee award. As such, having obtained a settlement that captures more
9 than 100% of the projected liability, exclusive of attorney's fees and costs, should
10 warrant a fee of one third, if not more.

11 44. It is a rarity in this practice, and it is the only time I believe it has ever been
12 achieved by me in a class case.

13 45. The result obtained in this case is not just a little bit better than the cases cited in
14 the memorandum of Points and Authorities, where a fee of one third was approved, it
15 is better by a factor of at least two (2) and even more than five (5).

16 46. **Risk:** There is no doubt that class actions are inherently risky. I concur with this
17 Court's analysis in *Aichele v. City of Los Angeles*,
18 (C.D. Cal., Sept. 9, 2015, No. CV1210863DMGFFMX) 2015 WL 5286028. Class
19 actions are very risky, and they can last over a decade.

20 47. I had one case that lasted more than 11 years, was presided over by five district
21 court judges in this district (two of whom passed away during the pendency of the case,
22 Judge Beverly Reid O'Connell and Judge Florence Marie Cooper), three Ninth Circuit,
23 and we even had a trip to the US Supreme Court. Upon remittitur to the District Court,
24 the case was decertified one month before trial, and it ultimately settled for \$15 million,
25 which provided precious little to cover all of the time and expenses invested in the case.

26 48. Here, at the outset, while it seemed that Plaintiff would not likely have much
27 difficulty in establishing liability, it was unclear due to the myriad of what appeared to
be defunct corporate shells that once employed Plaintiff, whether Plaintiff would be

1 able to ultimately collect any judgment obtained for what seemed to be a relatively clear
2 violation of law.

3 49. As the Court will note while inspecting the docket, early in this litigation, the
4 parties engaged in substantial negotiation regarding which parties would be dismissed
5 and which would remain in the litigation, due to the multiple, related entities that had
6 employed Plaintiff, several of which seemed to have been defunct organizations at the
7 time this case was filed.

8 50. Moreover, as will be addressed further below, this litigation was undertaken by
9 me on a purely contingent basis, which meant that if Plaintiff had not succeeded, I would
10 be out not only the thousands of dollars for costs I advanced out-of-pocket, but hundreds
11 of thousands of dollars' worth of time. As a sole practitioner, I can ill afford such a loss.

12 51. **Efficiency, Experience, and Skill of Counsel:** This case resulted in early
13 settlement and, fortunately, was not the subject of contentious litigation, credit for
14 which rests with my opposing counsel.

15 52. A close inspection of my billing records will demonstrate that there is not a lot of
16 fluff.

17 53. The activities I undertook in litigating this case are directed at efficiently
18 achieving a satisfactory resolution for my client and the absent class members.

19 54. As noted above, I have been representing plaintiffs in class actions since 1998,
20 and, with 26 years of experience, I have sufficient prospective to enable me to
21 effectively prosecute these cases, which have yielded tens of millions of dollars and
22 judgments and settlements for my clients.

23 55. Those results are indicative of the skill I have brought to this case.

24 56. **Efforts Expended by Counsel:** I have worked on this case for two and one
25 quarter years.

26 57. My hours worked are recorded in detail in **Exhibit 1**.

27 58. My time records establish that I performed an investigation involving direct
communication with multiple class members and with Ms. Brown. I also prepared a

1 Rule 26 conference report, analyzed documents from various sources, including
2 documents that are publicly available, regarding the Defendants and their operations. I
3 prepared a mediation brief and engaged in a half-day mediation after multiple days of
4 direct negotiations with Defense counsel. I took the lead role in preparing the settlement
5 documents herein. Even after the initial draft of the settlement documents were
6 prepared, the terms were subject to ongoing negotiations for nearly 12 weeks. During
7 that time, I persuaded Defendants to increase the proposed settlement amount from \$1.6
8 million to \$1.8 million, based upon the triggering of an escalator clause I ensured to put
9 in the Memorandum of Understanding (“MOU”) executed on March 11, 2024, which
10 MOU constituted the framework for the long-form Settlement agreement preliminarily
approved by the Court.

11 59. I will continue to be occupied with a multitude of tasks related to the resolution
12 of this case, including, but not limited to preparing a motion for final approval, working
13 with the Claims Administrator, and working with Plaintiff and absent class members as
14 needed. I anticipate that will take at least 30 hours of my time.

15 60. **Contingent Nature of the Fee:** As noted above, I prosecuted this case on a
16 purely contingent basis, agreeing to advance all necessary expenses and taking a risk I
17 would not be paid at all if there were no recovery.

18 61. My outlay of time (299.3 hours to date) and money (\$6,319) in this case has been
19 considerable.

20 62. This case presented less of a risk regarding legal liability, but more of a risk of
21 collectability, as explained herein above.

22 63. **Awards in Similar Cases and Counsel’s Reasonable Expectations:** District
23 courts frequently approve attorneys’ fees *exceeding* the benchmark of 25% of the
24 settlement fund, but in cases with exceptional results, like this one, it is reasonable to
expect that one will be awarded a percentage fee award that may exceed the lodestar.

25 64. In sum, at one-third of the Settlement Amount, the fee award sought by me here
26 is within the range of fees in class action cases commonly approved by California

1 district courts, which, in turn, forms a basis for a reasonable expectation that they will
2 be awarded here.

3 **65. Preclusion of Other Employment:** An additional factor that should be
4 considered is the preclusion of other employment. As a sole practitioner, by dedication
5 of over 300 hours to the prosecution of this case has necessarily precluded me from
6 taking on other profitable matters.

7 **66. The Reaction of the Class:** The reaction of the class may also be considered
8 when determining the reasonableness of a fee request.

9 **67.** Here, the court-approved notice, clearly and explicitly stating the intention of
10 Class Counsel to request \$600,000.00 in attorneys' fees, was mailed to Class Members
11 on August 23, 2024.

12 **68.** Class Members will have the opportunity to inspect my fee motion for another
13 two weeks before their deadline to object to the settlement or requested attorneys' fees
14 expires, because it will not only be available on PACER, it will also be available on the
15 Claims Administrator's website that has been created for this Settlement.

16 **69.** To date, *zero* Class Members have objected to the settlement or attorneys' fees
17 (and zero class members opted out).

18 **70.** Moreover, it is my understanding based on the concurrently filed declaration of
19 Jeremy Talavera from CPT Group, that approximately 7% of eligible FLSA collective
20 class members have submitted claims, which is typical for FLSA collective classes.

21 **71.** Assuming the claims process continues on its same trajectory, these results will
22 provide further evidence supporting the requested attorneys' fees.

23 **72. Class Counsel's Costs:** The out-of-pocket costs I have incurred while prosecuting
24 this action are also reasonable. Although this Court did not specifically order that Class
25 Counsel seek costs in this motion for fees, I included this information so that, before the
26 deadline to opt in, opt out, or object, class members are aware of the costs that have been
27 incurred to date by Class Counsel in the prosecution of this case.

1 73. I expect that there will be no objections to the costs incurred, which will, in turn,
2 provide further support for the Settlement at final approval.

3 74. Plaintiff's costs in this case are approximately \$6,319, the largest component of
4 which is the mediator's fee of \$5000.

5 75. Attached hereto as **Exhibit 3** is a copy of the Excel spreadsheet we use in my
6 office to track expenses.

7 76. The costs incurred in this case are relatively modest, because this case did not
8 undergo contentious litigation.

9 77. Nevertheless, these costs are still substantial, and they were necessarily incurred
10 in the furtherance of the objectives of this litigation.

11 78. Defendant has agreed to reimburse Class Counsel for expenses incurred up to
12 \$10,000.

13 79. As such, I submit that ordering my office to be reimbursed for these costs is not
14 only supported by case law, it is entirely appropriate here.

15 I declare under penalty of perjury of the laws of the United States of America that
16 the foregoing is true and accurate and that this declaration was executed on September
23, 2024 at Los Angeles California.

17 By: /s/ Paul T. Cullen
18 Paul T. Cullen

19 Class Counsel and Attorneys for
20 PLAINTIFF IA BROWN

EXHIBIT 1

The Cullen Law Firm, APC - Summary Report

Date Start: 1/1/2021 | Date End: 9/23/2024 | Clients: Brown, la | Projects: | Users: All | Account Managers: All | Group By: Client

Client	Attorney Timekeeper	Date	Project	Description	Rate	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt
Brown, la	Paul Cullen	04/21/2021	Brown v. HEARx West, Inc.	A106 Communicate (with client): Telephone conference with client. Receipt and review correspondence from client	1,100.00 hr	1.70	1.70	1870.00
Brown, la	Paul Cullen	04/22/2021	Brown v. HEARx West, Inc.	Telephone conference with client. Draft notes/memo to file.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	04/28/2021	Brown v. HEARx West, Inc.	A108 Communicate (other external): Communicate (other outside counsel)	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	05/11/2021	Brown v. HEARx West, Inc.	A106 Communicate (with client): Telephone conference with client.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	05/11/2021	Brown v. HEARx West, Inc.	L120 Analysis/Strategy: Intraoffice conference re case management.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	05/19/2021	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from J Cullen to Defendant.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	06/29/2021	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	07/09/2021	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client.	1,100.00 hr	0.10	0.10	110.00
Brown, la	Paul Cullen	07/09/2021	Brown v. HEARx West, Inc.	A106 Communicate (with client): Telephone conference with client.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	07/09/2021	Brown v. HEARx West, Inc.	A106 Communicate (with client): Draft correspondence to client.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	09/01/2021	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	09/01/2021	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client.	1,100.00 hr	0.10	0.10	110.00
Brown, la	Paul Cullen	01/10/2022	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	05/31/2022	Brown v. HEARx West, Inc.	A105 Communicate (in firm): Draft correspondence to client.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	06/15/2022	Brown v. HEARx West, Inc.	A105 Communicate (in firm): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	06/16/2022	Brown v. HEARx West, Inc.	A106 Communicate (with client): travel to/from and attend meeting with client.	1,100.00 hr	3.50	3.50	3850.00
Brown, la	Paul Cullen	06/17/2022	Brown v. HEARx West, Inc.	A106 Communicate (with client): teleconference with client.	1,100.00 hr	1.20	1.20	1320.00
Brown, la	Paul Cullen	06/17/2022	Brown v. HEARx West, Inc.	A102 Research: Research regarding hybrid class and collective actions.	1,100.00 hr	2.50	2.50	2750.00
Brown, la	Paul Cullen	06/18/2022	Brown v. HEARx West, Inc.	A105 Communicate (in firm): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	06/18/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): Communicate with potential witnesses and/or clients.	1,100.00 hr	2.70	2.70	2970.00
Brown, la	Paul Cullen	06/20/2022	Brown v. HEARx West, Inc.	A106 Communicate (with client): teleconferences with client.	1,100.00 hr	1.10	1.10	1210.00
Brown, la	Paul Cullen	06/20/2022	Brown v. HEARx West, Inc.	A102 Research: research regarding potential defendants and status of multiple target defendants, including principals of multiple apparently defunct entities.	1,100.00 hr	3.40	3.40	3740.00
Brown, la	Paul Cullen	06/20/2022	Brown v. HEARx West, Inc.	A103 Draft/revise: Commence drafting of class and collective action complaint	1,100.00 hr	2.90	2.90	3190.00
Brown, la	Paul Cullen	06/21/2022	Brown v. HEARx West, Inc.	A103 Draft/revise: continue drafting of class and collective action complaint	1,100.00 hr	7.80	7.80	8580.00
Brown, la	Paul Cullen	06/22/2022	Brown v. HEARx West, Inc.	A103 Draft/revise: review, revise and finalize class and collective action complaint. Draft summons and civil case cover sheet. Attend to filing of same.	1,100.00 hr	5.10	5.10	5610.00
Brown, la	Paul Cullen	06/23/2022	Brown v. HEARx West, Inc.	A102 Research: receipt and review of court generated documents upon filing, including notice of Case assignment, court directed ADR program and consent to proceed with US Magistrate. Research judicial assignment and review all standing orders.	1,100.00 hr	2.80	2.80	3080.00
Brown, la	Paul Cullen	06/24/2022	Brown v. HEARx West, Inc.	A106 Communicate (with client): Draft correspondence to client and Telephone conference with client	1,100.00 hr	1.60	1.60	1760.00
Brown, la	Paul Cullen	06/27/2022	Brown v. HEARx West, Inc.	A104 Review/analyze: Review Court's standing order.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	08/08/2022	Brown v. HEARx West, Inc.	A105 Communicate (in firm): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	09/15/2022	Brown v. HEARx West, Inc.	A107 Communicate (other outside counsel): Teleconference with opposing counsel. Receipt and review correspondence from Opposing Counsel and Draft notes/memo to file.	1,100.00 hr	0.80	0.80	880.00
Brown, la	Paul Cullen	09/15/2022	Brown v. HEARx West, Inc.	A107 Communicate (other outside counsel): Receipt and review voicemail from Opposing Counsel and Draft notes/memo to file.	1,100.00 hr	0.30	0.30	330.00

Brown, la	Paul Cullen	09/16/2022	Brown v. HEARx West, Inc.	A107 Communicate (other outside counsel): Receipt and review correspondence from opposing counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	09/19/2022	Brown v. HEARx West, Inc.	A107 Communicate (other outside counsel): Receipt and review correspondence from opposing counsel including draft stipulation re extension of time to respond to complaint by not more than 30 days. Research file re: dates of service on various defendants, and respond to defense counsel's correspondence.	1,100.00 hr	1.20	1.20	1320.00
Brown, la	Paul Cullen	09/22/2022	Brown v. HEARx West, Inc.	A107 Communicate (other outside counsel): Receipt and review correspondence from client and Respond to same re: service of process on various defendants and responsive pleading deadlines. research file to confirm accuracy of Defendants' representations.	1,100.00 hr	1.50	1.50	1650.00
Brown, la	Paul Cullen	09/23/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): Prepare for teleconference with Opposing Counsel and Telephone conference with Opposing Counsel re status of service.	1,100.00 hr	0.70	0.70	770.00
Brown, la	Paul Cullen	09/23/2022	Brown v. HEARx West, Inc.	A107 Communicate (other outside counsel): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	09/23/2022	Brown v. HEARx West, Inc.	A103 Draft/revise: Draft memo to opposing counsel regarding status of service on multiple defendants.	1,100.00 hr	1.10	1.10	1210.00
Brown, la	Paul Cullen	10/05/2022	Brown v. HEARx West, Inc.	A103 Draft/revise: Receipt and review correspondence from Opposing Counsel and Respond to same. re status of service of process and potential stipulations. Draft notes/memo to file.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	10/14/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): Draft correspondence to Opposing Counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	10/14/2022	Brown v. HEARx West, Inc.	A105 Communicate (in firm): Intra-office Conference re: case management.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	10/17/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	10/21/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review of multiple lengthy stipulations regarding dismissal of individual defendants and purportedly uninvolved entities.	1,100.00 hr	2.70	2.70	2970.00
Brown, la	Paul Cullen	10/24/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with opposing counsel regarding multiple stipulations. Revise and Provide input regarding same.	1,100.00 hr	3.00	3.00	3300.00
Brown, la	Paul Cullen	10/25/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): approved filing of stipulations. Receipt and review of same from CM ECF.	1,100.00 hr	0.80	0.80	880.00
Brown, la	Paul Cullen	10/25/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): teleconference with opposing counsel. Approved filing of stipulations. Receipt and review of notices of appearance of counsel. Served summons, complaint, etc. on Defendants HearX West, Inc. and Audiology Distribution, LLC via electronic service.	1,100.00 hr	1.20	1.20	1320.00
Brown, la	Paul Cullen	10/26/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): Communication with opposing counsel regarding acceptance of service of process pursuant to stipulations.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	10/27/2022	Brown v. HEARx West, Inc.	A104 Review/analyze: review court orders on stipulations and review file. Intraoffice conference re case management. re case management.	1,100.00 hr	0.80	0.80	880.00
Brown, la	Paul Cullen	11/14/2022	Brown v. HEARx West, Inc.	A104 Review/analyze: review defendants' answer to complaint.	1,100.00 hr	2.10	2.10	2310.00
Brown, la	Paul Cullen	11/15/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	11/15/2022	Brown v. HEARx West, Inc.	A104 Review/analyze: Review local rules and Draft correspondence to Opposing Counsel	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	11/15/2022	Brown v. HEARx West, Inc.	A104 Review/analyze: Conduct preliminary review of order re scheduling conference and Draft correspondence to Opposing Counsel	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	11/15/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): Review file and prepare communication to opposing counsel regarding LR 7-1 conference regarding anticipated motion for conditional certification of FLSA collective action.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	11/15/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with opposing counsel regarding calendar conflict .	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	11/15/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with opposing counsel regarding calendar conflict and LR.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	11/16/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): Review file and Contact clerk of Court to notify regarding calendar conflict	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	11/17/2022	Brown v. HEARx West, Inc.	A104 Review/analyze: receipt and review of notice of continuance (ECF 21)	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	12/08/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with opposing counsel regarding early meeting of counsel.	1,100.00 hr	0.20	0.20	220.00

Brown, la	Paul Cullen	12/20/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with opposing counsel regarding early meeting of counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	12/22/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with opposing counsel regarding early meeting of counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	12/22/2022	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with opposing counsel regarding early meeting of counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	01/05/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with opposing counsel regarding early meeting of counsel and draft joint report.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	01/06/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	01/06/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	01/06/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with opposing counsel regarding draft joint report. revise draft report and provide input to opposing counsel.	1,100.00 hr	2.10	2.10	2310.00
Brown, la	Paul Cullen	01/06/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with opposing counsel regarding draft joint report. revise draft report and provide input to opposing counsel. Obtain and Review filed Joint Report.	1,100.00 hr	2.10	2.10	2310.00
Brown, la	Paul Cullen	01/06/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	01/27/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client) and prepare disclosures.	1,100.00 hr	1.90	1.90	2090.00
Brown, la	Paul Cullen	01/27/2023	Brown v. HEARx West, Inc.	A103 Draft/revise: prepare and serve initial disclosures.	1,100.00 hr	1.40	1.40	1540.00
Brown, la	Paul Cullen	01/27/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receive and review defendant's initial disclosures.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	01/27/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receive and review defendant's initial disclosures as well as Defendants' document production.	1,100.00 hr	2.00	2.00	2200.00
Brown, la	Paul Cullen	02/01/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	02/23/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same, and teleconference with client.	1,100.00 hr	1.10	1.10	1210.00
Brown, la	Paul Cullen	03/13/2023	Brown v. HEARx West, Inc.	A103 Draft/revise: prepare and serve requests for production of documents for all defendants.	1,100.00 hr	3.20	3.20	3520.00
Brown, la	Paul Cullen	03/17/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): communications from opposing counsel regarding additional potential mediators. Research same.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	03/21/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Review file and draft correspondence to opposing counsel regarding mediation.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	03/21/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	03/21/2023	Brown v. HEARx West, Inc.	A103 Draft/revise: prepare 2 sets of special interrogatories, one for each defendant.	1,100.00 hr	3.00	3.00	3300.00
Brown, la	Paul Cullen	04/19/2023	Brown v. HEARx West, Inc.	A104 Review/analyze: Receipt and review of Defendants' responses to request for production of documents and document production. Identify responses requiring meet and confer efforts.	1,100.00 hr	2.60	2.60	2860.00
Brown, la	Paul Cullen	04/20/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review of message from Opposing Counsel. Respond to same and Draft notes/memo to file.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	04/27/2023	Brown v. HEARx West, Inc.	A104 Review/analyze: Receipt and review of further responses to special interrogatories set one.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	05/06/2023	Brown v. HEARx West, Inc.	A104 Review/analyze: prepare meet and confer correspondence regarding document production (8 pp.).	1,100.00 hr	3.50	3.50	3850.00
Brown, la	Paul Cullen	05/09/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel.	1,100.00 hr	0.10	0.10	110.00
Brown, la	Paul Cullen	05/11/2023	Brown v. HEARx West, Inc.	A101 Plan and prepare for: Review file and prepare for a teleconference with opposing counsel.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	05/11/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): teleconference with opposing counsel.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	05/11/2023	Brown v. HEARx West, Inc.	A103 Draft/revise: Draft notes/memo to file.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	05/11/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.30	0.30	330.00

Brown, la	Paul Cullen	05/19/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	05/31/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same. Draft notes/memo to file.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	05/31/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel, review file, and Respond to correspondence.	1,100.00 hr	1.00	1.00	1100.00
Brown, la	Paul Cullen	06/09/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	06/09/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel, review proposed stipulation, draft revisions to same, and Respond to correspondence.	1,100.00 hr	1.00	1.00	1100.00
Brown, la	Paul Cullen	06/12/2023	Brown v. HEARx West, Inc.	Communication with client.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	06/12/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client): Review file and Draft correspondence to client.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	06/12/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client): multiple items of correspondence with client and teleconference with client.	1,100.00 hr	0.80	0.80	880.00
Brown, la	Paul Cullen	06/13/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Communication with witnesses.	1,100.00 hr	1.00	1.00	1100.00
Brown, la	Paul Cullen	06/13/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	06/14/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client): multiple items of correspondence with client and teleconference with client and witnesses.	1,100.00 hr	2.50	2.50	2750.00
Brown, la	Paul Cullen	06/21/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Preparation of correspondence to opposing counsel for data points needed for settlement negotiations.	1,100.00 hr	1.00	1.00	1100.00
Brown, la	Paul Cullen	06/21/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): analyze complaint and data necessary for meaningful settlement discussions. Draft correspondence to opposing counsel regarding same.	1,100.00 hr	2.20	2.20	2420.00
Brown, la	Paul Cullen	07/17/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): receipt and review of correspondence from opposing counsel regarding status of data preparation. Draft notes/memo to file.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	07/26/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Review file and draft correspondence to opposing counsel regarding status of data preparation.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	07/28/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	08/01/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel with class data and commence analyzing same.	1,100.00 hr	1.20	1.20	1320.00
Brown, la	Paul Cullen	08/29/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Draft correspondence to Opposing Counsel re data.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	10/06/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same. Telephone conference with client.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	10/11/2023	Brown v. HEARx West, Inc.	Review defendant's data to formulate damages model.	1,100.00 hr	1.00	1.00	1100.00
Brown, la	Paul Cullen	10/12/2023	Brown v. HEARx West, Inc.	A104 Review/analyze: Continued review of defendant's data to formulate damages model.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	10/12/2023	Brown v. HEARx West, Inc.	Call to opposing counsel.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	10/13/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	10/13/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): prepare for and engage in teleconference with opposing counsel. Draft notes to file.	1,100.00 hr	2.00	2.00	2200.00
Brown, la	Paul Cullen	10/17/2023	Brown v. HEARx West, Inc.	A104 Review/analyze: Continued computations of liability to prepare settlement demand.	1,100.00 hr	1.50	1.50	1650.00
Brown, la	Paul Cullen	10/17/2023	Brown v. HEARx West, Inc.	Draft correspondence to Opposing Counsel.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	10/17/2023	Brown v. HEARx West, Inc.	A103 Draft/revise: Prepare and serve three Rule 30B6 deposition notices with requests for production of documents for PMKs from each defendant. draft correspondence to opposing counsel regarding same.	1,100.00 hr	3.10	3.10	3410.00
Brown, la	Paul Cullen	10/17/2023	Brown v. HEARx West, Inc.	A103 Draft/revise: Draft 3 Rule 30(b)(6) deposition notices. Draft correspondence to Opposing Counsel, and serve same.	1,100.00 hr	3.00	3.00	3300.00
Brown, la	Paul Cullen	10/17/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	10/18/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review of correspondence from opposing counsel regarding liability data. Respond to same. Follow-up correspondence between counsel.	1,100.00 hr	0.40	0.40	440.00

Brown, la	Paul Cullen	10/19/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same. Multiple items.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	10/19/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review additional correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	10/23/2023	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review communication from client. Respond to same.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	10/24/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review of Defendants' objections to deposition notices. Analyze same. Also review proposed 2nd joint stipulation to continue all case management dates, including class certification, trial, etc. Approve stipulation and communicate with opposing counsel re: same.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	10/24/2023	Brown v. HEARx West, Inc.	A104 Review/analyze: Receipt and review of filed stipulation.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	10/31/2023	Brown v. HEARx West, Inc.	A104 Review/analyze: Receipt and review of order on filed stipulation. Recalculate Case management dates and revise the litigation plan.	1,100.00 hr	0.70	0.70	770.00
Brown, la	Paul Cullen	11/01/2023	Brown v. HEARx West, Inc.	A104 Review/analyze: Receipt and review of vendor analysis re: automatic docketing of deadlines. Communicate with vendor regarding same.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	12/04/2023	Brown v. HEARx West, Inc.	A104 Review/analyze: Prepare spreadsheet exposure analysis of potential liability.	1,100.00 hr	3.60	3.60	3960.00
Brown, la	Paul Cullen	12/05/2023	Brown v. HEARx West, Inc.	A104 Review/analyze: Continued preparation of spreadsheet exposure analysis of potential liability.	1,100.00 hr	2.20	2.20	2420.00
Brown, la	Paul Cullen	12/06/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Complete preliminary exposure analysis and Draft settlement demand to opposing counsel.	1,100.00 hr	1.10	1.10	1210.00
Brown, la	Paul Cullen	12/12/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review of correspondence from opposing counsel, and respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	12/12/2023	Brown v. HEARx West, Inc.	A103 Draft/revise: Draft notes/memo to file.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	12/12/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Teleconference with opposing counsel.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	12/12/2023	Brown v. HEARx West, Inc.	A101 Plan and prepare for: Review file and prepare teleconference with opposing counsel.	1,100.00 hr	0.80	0.80	880.00
Brown, la	Paul Cullen	12/29/2023	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review of lengthy correspondence from opposing counsel analyzing settlement demand and exposure analysis. Respond to same.	1,100.00 hr	2.20	2.20	2420.00
Brown, la	Paul Cullen	01/08/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Review additional data from defendants and update settlement analysis regarding same. Draft correspondence to opposing counsel updating exposure analysis.	1,100.00 hr	2.00	2.00	2200.00
Brown, la	Paul Cullen	01/08/2024	Brown v. HEARx West, Inc.	A102 Research: Research potential mediators.	1,100.00 hr	0.80	0.80	880.00
Brown, la	Paul Cullen	01/09/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	01/10/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same. Multiple items.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	01/11/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel.	1,100.00 hr	0.10	0.10	110.00
Brown, la	Paul Cullen	01/12/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel.	1,100.00 hr	0.10	0.10	110.00
Brown, la	Paul Cullen	01/12/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel. Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	01/17/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel including draft stipulation to continue Case deadlines. Respond to opposing counsel and approve the stipulation.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	01/17/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: review Court order on stipulation and input new case deadlines into litigation plan.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	02/20/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review of correspondence from office of mediator, Hunter Hughes. Respond to same.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	02/29/2024	Brown v. HEARx West, Inc.	A101 Plan and prepare for: Intraoffice conference re case management. re: case management.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	03/05/2024	Brown v. HEARx West, Inc.	A101 Plan and prepare for: prepare analysis for submission to mediator.	1,100.00 hr	3.20	3.20	3520.00
Brown, la	Paul Cullen	03/06/2024	Brown v. HEARx West, Inc.	A101 Plan and prepare for: Continued preparation and analysis for submission a mediation brief to mediator.	1,100.00 hr	4.00	4.00	4400.00
Brown, la	Paul Cullen	03/07/2024	Brown v. HEARx West, Inc.	A101 Plan and prepare for: prepare first draft of mediation brief.	1,100.00 hr	2.80	2.80	3080.00
Brown, la	Paul Cullen	03/08/2024	Brown v. HEARx West, Inc.	A101 Plan and prepare for: Finalize and submit mediation brief to mediator.	1,100.00 hr	4.10	4.10	4510.00

Brown, la	Paul Cullen	03/10/2024	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	03/11/2024	Brown v. HEARx West, Inc.	A109 Appear for/attend: Prepare for and Attend mediation and prepare and execute MOU of settlement.	1,100.00 hr	8.00	8.00	8800.00
Brown, la	Paul Cullen	03/11/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): multiple communications between counsel.	1,100.00 hr	0.70	0.70	770.00
Brown, la	Paul Cullen	03/27/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Draft correspondence to Opposing Counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	03/27/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	03/28/2024	Brown v. HEARx West, Inc.	A102 Research: research court-approved settlement documents for hybrid FLSA and California wage claim settlements.	1,100.00 hr	1.80	1.80	1980.00
Brown, la	Paul Cullen	03/29/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): multiple communications among counsel.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	04/09/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): review file and settlement documentation and place call to opposing counsel.	1,100.00 hr	1.60	1.60	1760.00
Brown, la	Paul Cullen	04/09/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): prepare draft long-form settlement agreement.	1,100.00 hr	5.90	5.90	6490.00
Brown, la	Paul Cullen	04/09/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Commence preparation of long form settlement agreement.	1,100.00 hr	3.50	3.50	3850.00
Brown, la	Paul Cullen	04/10/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): research claims administrators obtain bids from 3 separate administrators.	1,100.00 hr	1.40	1.40	1540.00
Brown, la	Paul Cullen	04/10/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): revise initial draft of long-form settlement agreement. send same to opposing counsel	1,100.00 hr	1.60	1.60	1760.00
Brown, la	Paul Cullen	04/10/2024	Brown v. HEARx West, Inc.	Continue preparation of draft long form settlement agreement.	1,100.00 hr	3.30	3.30	3630.00
Brown, la	Paul Cullen	04/10/2024	Brown v. HEARx West, Inc.	Draft correspondence to multiple claims administrators seeking bids for claims administration.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	04/10/2024	Brown v. HEARx West, Inc.	Teleconference with opposing counsel. Draft notes/memo to file.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	04/11/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Analyze bid from and communicate with proposed claims administrator	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	04/11/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): - obtain bids from Claims Administrators.	1,100.00 hr	1.20	1.20	1320.00
Brown, la	Paul Cullen	04/11/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Review file and Draft correspondence to Opposing Counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	04/11/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Review file and Draft correspondence to Opposing Counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	04/15/2024	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	04/15/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	04/15/2024	Brown v. HEARx West, Inc.	Receipt and review additional correspondence from client and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	04/16/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Research issues regarding class notice in hybrid FLSA/California class settlements. Prepare proposed class notice.	1,100.00 hr	3.50	3.50	3850.00
Brown, la	Paul Cullen	04/16/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): draft correspondence to opposing counsel. multiple items.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	04/16/2024	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same. multiple items.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	04/18/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Conduct research re and commence preparation of motion for preliminary approval.	1,100.00 hr	4.10	4.10	4510.00
Brown, la	Paul Cullen	04/19/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: continued preparation of motion for preliminary approval.	1,100.00 hr	3.60	3.60	3960.00
Brown, la	Paul Cullen	04/19/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): draft correspondence to opposing counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	04/22/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): draft correspondence to opposing counsel.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	04/22/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	04/23/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	04/23/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	04/23/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Review and analyze class notice. Revise same and send revisions to opposing counsel.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	04/25/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Review file and Draft correspondence to Opposing Counsel.	1,100.00 hr	0.30	0.30	330.00

Brown, la	Paul Cullen	04/26/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Receipt and review correspondence from Opposing Counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	05/02/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Review file and draft correspondence to opposing counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	05/02/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Receipt and review correspondence from Opposing Counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	05/08/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Review file and draft correspondence to opposing counsel.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	05/08/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Review local rules and draft correspondence to clerk of court informing of settlement.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	05/08/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): receipt and review of correspondence from court clerk and respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	05/08/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Draft a notice of settlement and file with the court.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	05/14/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Review file and Draft correspondence to opposing counsel.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	05/15/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	05/16/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Communicate with the three proposed claims administrators regarding increased number of class members and request revised quotes.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	05/16/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	05/16/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Telephone conference with Opposing Counsel.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	05/16/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Draft correspondence to Opposing Counsel with proposal.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	05/16/2024	Brown v. HEARx West, Inc.	Telephone conference with client.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	05/21/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Review file and draft correspondence to opposing counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	05/22/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	05/22/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): prepare revisions to the class notice language and communicate same to opposing counsel.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	05/29/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Review file and prepare correspondence to opposing counsel.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	05/29/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): draft correspondence to mediator.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	05/29/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Review scheduling notice/in chambers order.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	05/29/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	05/31/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Review and analyze proposed long-form settlement agreement. Prepare comments regarding same and communicate with opposing counsel.	1,100.00 hr	2.40	2.40	2640.00
Brown, la	Paul Cullen	05/31/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same. (Multiple items.)	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	05/31/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Prepare further revisions to class notice and communicate same to opposing counsel.	1,100.00 hr	1.00	1.00	1100.00
Brown, la	Paul Cullen	06/03/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review of correspondence from opposing counsel and analyze revisions to proposed class notice and long-form settlement agreement. Draft responsive correspondence to opposing counsel.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	06/03/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	06/04/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Conduct further review of proposed final settlement document and class notice. Draft correspondence to opposing counsel regarding same.	1,100.00 hr	0.70	0.70	770.00
Brown, la	Paul Cullen	06/05/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: draft proposed declaration of Martha Doty.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	06/05/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: draft proposed declaration of Plaintiff.	1,100.00 hr	2.50	2.50	2750.00
Brown, la	Paul Cullen	06/05/2024	Brown v. HEARx West, Inc.	A106 Communicate (with client): communicate with client. Obtain signatures on declaration and settlement agreement.	1,100.00 hr	1.00	1.00	1100.00
Brown, la	Paul Cullen	06/05/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Draft correspondence to Opposing Counsel.	1,100.00 hr	0.20	0.20	220.00

Brown, la	Paul Cullen	06/05/2024	Brown v. HEARx West, Inc.	A106 Communicate (with client): teleconference with client.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	06/06/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Multiple communications with opposing counsel. Draft notes/memo to file.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	06/06/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Preparation of motion for preliminary approval.	1,100.00 hr	4.60	4.60	5060.00
Brown, la	Paul Cullen	06/07/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Prepare joint report regarding status of settlement. Circulate to opposing counsel and attend to filing of same.	1,100.00 hr	1.00	1.00	1100.00
Brown, la	Paul Cullen	06/07/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Continued preparation of motion for preliminary approval.	1,100.00 hr	5.00	5.00	5500.00
Brown, la	Paul Cullen	06/09/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: communicate with claims administrator and draft a proposed declaration for claims administrator.	1,100.00 hr	1.80	1.80	1980.00
Brown, la	Paul Cullen	06/09/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): multiple communications with opposing counsel (email and voicemail) regarding motion for preliminary approval and proper calculation for attorney's fee request.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	06/10/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): review file and multiple communications with opposing counsel - including receipt of fully executed settlement agreement preparation of same for filing.	1,100.00 hr	0.70	0.70	770.00
Brown, la	Paul Cullen	06/10/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Continued preparation of motion for preliminary approval and commence preparation of declaration of counsel in support of settlement.	1,100.00 hr	5.80	5.80	6380.00
Brown, la	Paul Cullen	06/11/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Continued preparation of motion for preliminary approval and declaration of counsel re same.	1,100.00 hr	8.20	8.20	9020.00
Brown, la	Paul Cullen	06/11/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Draft declarations of Katie Waldorf and Jack Williams.	1,100.00 hr	1.00	1.00	1100.00
Brown, la	Paul Cullen	06/11/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Telephone conference with Opposing Counsel. Draft notes/memo to file.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	06/12/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Draft proposed order on preliminary approval.	1,100.00 hr	2.90	2.90	3190.00
Brown, la	Paul Cullen	06/12/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: conduct final review and editorial changes on motion for preliminary approval. Attend filing the same.	1,100.00 hr	3.10	3.10	3410.00
Brown, la	Paul Cullen	06/21/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: receipt and review of notice of non-opposition, declarations of Martha S Doty, Katie Waldorf and Jack Williams. Draft notes/memo to file.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	07/01/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	07/05/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: prepare a stipulation and proposed order to continue hearing on motion for preliminary approval to enable defense counsel to personally attend. communicate with opposing counsel regarding same.	1,100.00 hr	2.90	2.90	3190.00
Brown, la	Paul Cullen	07/18/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt, review, and response to inquiry from court clerk requesting a copy of the proposed settlement agreement to be filed in advance of hearing. Attend to filing of same.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	07/18/2024	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same. Teleconference with client.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	07/19/2024	Brown v. HEARx West, Inc.	A109 Appear for/attend: Travel to/from and attendant motion for preliminary approval.	1,100.00 hr	3.90	3.90	4290.00
Brown, la	Paul Cullen	07/19/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: review redlined class notice and minutes from hearing upon granting of motion for preliminary approval.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	07/20/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Draft correspondence to claims administrator informing of granting of motion for preliminary approval and its appointment as claims administrator. Provide redlined class notice.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	07/23/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	07/23/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Receipt and review correspondence from administrator and Respond to same.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	07/23/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Review preliminary approval order and set deadlines internally.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	07/31/2024	Brown v. HEARx West, Inc.	A106 Communicate (with client): Receipt and review correspondence from client and Respond to same.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	07/31/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review of correspondence from Jeremy Talavera, CPT group respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	08/13/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Telephone conference with Opposing Counsel, claims administrator and expert. Draft notes/memo to file.	1,100.00 hr	0.70	0.70	770.00

Brown, la	Paul Cullen	08/13/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and prepare for meeting	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	08/21/2024	Brown v. HEARx West, Inc.	L210 Pleadings: - prepare FLSA claim form and communicate with the claims administrator regarding same.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	08/21/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Review file and communicate with the claims administrator regarding upcoming deadline for mailing.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	08/23/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review of communications from claims administrator and opposing counsel regarding documents prepared for initial mailing. Communicate with claims administrator approving same.	1,100.00 hr	1.30	1.30	1430.00
Brown, la	Paul Cullen	08/30/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review of first report from CPT group regarding status of claims administration.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	09/03/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Responding to questions from class members.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	09/05/2024	Brown v. HEARx West, Inc.	A106 Communicate (with client): Communications with class members - telephone conferences and e-mail.	1,100.00 hr	0.60	0.60	660.00
Brown, la	Paul Cullen	09/05/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Responding to questions from class members.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	09/05/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with the claims administrator regarding postcard reminder. (teleconference and multiple emails.)	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	09/05/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Review claims administrator website to ensure it is in compliance with Court's order and responsive to questions raised by class members.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	09/05/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Follow-up communications with the claims administrator and opposing counsel regarding postcard reminder and updates to website.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	09/06/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Prepare for and conduct teleconference with opposing counsel regarding claims process status and reminder postcard. Draft notes/memo to file.	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	09/06/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): communications with claims administrator. Multiple emails and telephone conferences to prepare and negotiate costs of reminder postcard.	1,100.00 hr	1.50	1.50	1650.00
Brown, la	Paul Cullen	09/06/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): further communications with opposing counsel regarding reminder postcard.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	09/06/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Draft/revise reminder postcard.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	09/06/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Teleconferences with class members.	1,100.00 hr	0.80	0.80	880.00
Brown, la	Paul Cullen	09/06/2024	Brown v. HEARx West, Inc.	A106 Communicate (with client): Teleconference with client.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	09/06/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: Review class settlement website	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	09/06/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review of correspondence from claims administrator and respond to same.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	09/06/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): multiple communications (emails and teleconferences) with claims administrator regarding updates to claims administrator website for case and reminder postcard.	1,100.00 hr	1.10	1.10	1210.00
Brown, la	Paul Cullen	09/06/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel and Respond to same in follow up with claims administrator re: agreement among counsel.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	09/08/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel re: reminder postcard.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	09/08/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Receipt and review correspondence from Opposing Counsel re: reminder postcard.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	09/09/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with class members.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	09/09/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with claims administrator Re: claim status and remainder postcard.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	09/09/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with claims administrator Re: claim status and remainder postcard.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	09/10/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with class members.	1,100.00 hr	0.30	0.30	330.00
Brown, la	Paul Cullen	09/10/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with claims administrator re: post card reminder. (multiple emails).	1,100.00 hr	0.50	0.50	550.00
Brown, la	Paul Cullen	09/11/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with class members.	1,100.00 hr	0.50	0.50	550.00

Brown, la	Paul Cullen	09/11/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): communicate with claims administrator re: post card reminder and website redesign.	1,100.00 hr	0.40	0.40	440.00
Brown, la	Paul Cullen	09/16/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): - Receipt and review of correspondence from outside counsel regarding CA opt out.	1,100.00 hr	0.20	0.20	220.00
Brown, la	Paul Cullen	09/20/2024	Brown v. HEARx West, Inc.	A104 Review/analyze: receipt and review of claims administrator's report. Note the discrepancy regarding claim submission and opt outs. Contact claims administrator regarding same to rectify improper programming and erroneous report.	1,100.00 hr	0.70	0.70	770.00
Brown, la	Paul Cullen	09/20/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: commence preparation of a fee application.	1,100.00 hr	6.30	6.30	6930.00
Brown, la	Paul Cullen	09/21/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: continued preparation of a fee application.	1,100.00 hr	6.80	6.80	7480.00
Brown, la	Paul Cullen	09/22/2024	Brown v. HEARx West, Inc.	A108 Communicate (other external): Search email for any opt in forms received. Prepare redacted opt in forms and draft correspondence to the claims administrator regarding same.	1,100.00 hr	0.70	0.70	770.00
Brown, la	Paul Cullen	09/23/2024	Brown v. HEARx West, Inc.	A103 Draft/revise: Continue drafting motion for Attorney's fees, supporting declaration and indications with opposing counsel and plaintiff administrator to obtain supporting declaration information.	1,100.00 hr	8.90	8.90	9790.00
Total Labor For Paul Cullen						299.30	299.30	\$ 329,230.00
Total Labor to Date For Brown, la						299.30	299.30	\$ 329,230.00
Total Additional Labor Estate For Brown, la	Paul Cullen	09/24/2024 to conclusion	Brown v. HEARx West, Inc.	Anticipated task include, but are not limited to drafting motion for Final approval.; Attending hearing regarding the same; and Assisting Class Members in response to inquiries and working with Claims Administrator to effectuate Settlement.	1,100.00 hr	30.00	30.00	\$ 33,000.00
GRAND TOTAL including additional estimated labor For Brown, la								\$ 362,230.00

EXHIBIT 2

LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375

6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363
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The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., DL v. District of Columbia, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $\frac{1}{2}$ Years Out of Law School $\frac{1}{2}$ is calculated from June 1 of each year, when most law students graduate. $\frac{1}{2}$ 1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $\frac{1}{2}$ 4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $\frac{1}{2}$ 1-3" from June 1, 1996 until May 31, 1999, would move into tier $\frac{1}{2}$ 4-7" on June 1, 1999, and tier $\frac{1}{2}$ 8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT 3

Brown v. HearX, et al. Costs

DATE	Description	amount
6/22/2022	Filing Fee	\$ 350.00
7/19/2022	Service of Process of Audiology Distribution	\$ 89.20
8/25/2022	Service of Process on Sivantos	\$ 192.40
8/29/2022	service of Process of HearX West, Delaware Corp	\$ 89.20
8/29/2022	Service of Process WS Audiology	\$ 89.20
8/31/2022	SOP Steve Mahon-2 attempts	\$ 174.20
8/31/2022	SOP Tino S.-2 attempts	\$ 174.20
8/30/2022	Service on HearX West, Inc.	\$ 72.35
9/1/2022	Attempted service on Craig Cameron	\$ 89.20
3/5/2024	Hunter Hughes-Mediation	<u>\$ 5,000.00</u>
		\$ 6,319.95

CERTIFICATE OF SERVICE

I, Paul T. Cullen, certify and declare as follow:

I am over the age of 18 and not a party to this action.

My business address is 9800 Topanga Canyon Boulevard; Suite D, PMB 325; Chatsworth, CA 91311-4057.

On September 23, 2024, I caused a copy of the following document:

**DECLARATION OF PAUL T. CULLEN IN SUPPORT OF
MOTION FOR APPROVAL OF CLASS COUNSEL’S FEES**

to be served upon the following counsel via the Court’s CM/ECF system:

YURI MIKULKA (State Bar No. 185926)
MARTHA S. DOTY (State Bar No. 143287)
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Attorneys for DEFENDANTS AUDIOLOGY DISTRIBUTION, LLC;
HEARX WEST, INC.; and HEARX WEST LLC

I declare under penalty of perjury that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made. Executed on September 23, 2024, at Los Angeles, California.

/s/ Paul T. Cullen
Attorneys for Plaintiff IA BROWN