

Exhibit 2

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO 19-10163-CIV-MARTINEZ-OTAZO-REYES

PEDRO J. CABRE, et al.,)
)
Plaintiffs,)
)
v.)
)
COTTON COMMERCIAL USA, et al.,)
)
Defendants.)
_____)

DECLARATION OF SARA L. FAULMAN

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the following is true and correct:

1. I am a partner with the law firm of McGillivray Steele Elkin LLP (“MSE”). I have been an attorney with MSE since October 2007, and I became a partner in 2014. I serve as lead Plaintiffs’ Counsel in the above-referenced case and submit this declaration in support of the Joint Motion for Approval of Settlement Between Plaintiffs and Defendant Cotton Commercial USA (“Cotton”).

2. Pursuant to the Settlement Agreement, Cotton has agreed to pay Plaintiffs \$50,000 in backpay and liquidated damages, and additional damages for retaliation. Cotton has also agreed to pay Plaintiffs’ Counsel \$45,000 in attorneys’ fees and expenses.

3. Settlement awards to each of the 18 opt-in Plaintiffs range from \$1,941 to \$3,935, as set forth in Exhibit A to the Settlement Agreement. These amounts were calculated based on the hours recorded in Cotton’s timekeeping records, based on the hourly wages promised to the

plaintiffs. Redacted versions of Cotton's timesheets indicating each Plaintiffs' recorded work hours were provided to Plaintiffs on February 24, 2020.

4. If Plaintiffs were to be compensated at the applicable minimum wage and associated overtime rate for all hours recorded in Cotton's timekeeping records, Plaintiffs would be owed approximately \$32,350 in backpay, excluding liquidated damages. If Plaintiffs were to be compensated at the hourly wage promised to them—either \$10, \$11, or \$24 per hour depending on each Plaintiffs' job location and title—and the associated overtime rate, Plaintiffs would be owed approximately \$45,280 in backpay, excluding liquidated damages.

5. Although Plaintiffs dispute that Cotton's timesheets accurately record all of the hours that Plaintiffs actually worked, Plaintiffs nevertheless utilized these records to calculate damages for purposes of settlement.

6. There are multiple ways to look at the Plaintiffs' recovery under the Settlement Agreement. One way to look at their recovery is that, under the Settlement Agreement, and regardless of whether the minimum wage or promised hourly rate is used to calculate damages, Plaintiffs will receive over 100% of the backpay owed to Plaintiffs based on Cotton's timekeeping records, plus an additional amount as liquidated damages. Another way to look at the recovery is that each Plaintiff will receive 55% of the backpay owed to them, with an equal amount as liquidated damages, paid at the promised hourly rate. Some Plaintiffs will also receive an additional amount as damages for retaliation.

7. Counsel for both parties have weighed the respective risks in proceeding with the litigation and have each extensively analyzed Cotton's potential liability based on damage calculations prepared by both McGillivray Steele Elkin LLP and Cotton, using Cotton's own

timekeeping records and assuming that Plaintiffs were not paid for any hours at all. Counsel for both Parties believe the Settlement is fair, reasonable and adequate.

8. Upon reaching a tentative settlement agreement with Cotton, Plaintiffs' counsel communicated the terms of the proposed settlement to the Plaintiffs on May 5, 2020, via letter sent by U.S. Mail, email, and/or WhatsApp message. The letter was sent in Spanish. In that letter, Plaintiffs were given information about their potential recovery, as well as the amount they would receive under the Settlement, and the amounts other Plaintiffs would receive under the Settlement. Plaintiffs were requested to respond by no later than May 22, 2020, with any objections to the terms of the settlement.

9. While a number of Plaintiffs contacted Plaintiffs' Counsel with questions regarding the Settlement Agreement, no Plaintiff voiced or otherwise submitted an objection to the terms of the settlement. As such, each Plaintiff determined that the certainty of settlement at the present time outweighs the costs of going forward against Cotton.

10. During the time spent litigating this case, Plaintiffs' Counsel have not been paid for any of the substantial work that they have performed. In fact, Counsel took this case on a contingency basis, with the understanding that if there was no recovery in the lawsuit then there would also be no entitlement to fees. In addition, Plaintiffs' Counsel advanced the expenses of this litigation.

11. A summary of Plaintiffs' Counsel's fees is attached to this declaration as **Exhibit A (McGillivray Steele Elkin)**, **Exhibit B (Resilience Force Justice Project)** and **Exhibit C (Mierzwa & Floyd)**. The recording of time and services by Plaintiffs' Counsel was done on a contemporaneous basis, and that information has been accurately extracted from each firm's billing records to prepare the summary fee listing in these Exhibits.

12. The total fees incurred by McGillivray Steele Elkin LLP (MSE) through May 27, 2020, was \$110,600.00. MSE used the following hourly billing rates: \$400 for Managing Partner Gregory K. McGillivray; \$350 for myself; \$275 for associate Sarah M. Block; \$250 for associates Hillary LeBeau and Ryan Cowdin; and \$125 for paralegals.

13. To date, the total fees incurred by Plaintiffs' Counsel Resilience Force Justice Project are \$17,520. Resilience Force Justice Project used the following hourly billing rates: \$400 for Kerry A. O'Brien. Although additional non-attorney members of Resilience Force Justice Project were involved in this case, their time was not billed.

14. To date, the total fees incurred by Plaintiffs' Counsel Mierzwa & Floyd are \$5,625.75. Mierzwa & Floyd used the following hourly billing rates: \$195 for Matthew J. Mierzwa; and \$195 for Erin F. Medeiros.

15. The \$45,000 in attorneys' fees, once expenses are subtracted, represents an approximately 69% discount from the hourly fees actually incurred by Plaintiffs' Counsel to date.

16. Plaintiffs' Counsel advised all Plaintiffs of the specific dollar amount of fees and expenses to be awarded to Plaintiffs' Counsel pursuant to the Settlement Agreement. No Plaintiff has objected to the amount of fees and expenses.

17. The billing rates utilized by Plaintiffs' Counsel are reasonable and consistent with hourly billing rates held to be reasonable in the Southern District of Florida. *See, e.g., See also Cardoza v. Mario's Cleaning Servs.*, 2018 U.S. Dist. LEXIS 41990 (S.D. Fla. Mar. 14, 2018) (finding hourly rates of \$350 per hour for attorney with 18 years of employment law experience and \$250 per hour for attorneys with 4-6 years of legal experience reasonable); *Bacallao v. Zidell*, 2016 U.S. Dist. LEXIS 167379 (S.D. Fla. Nov. 3, 2016) (awarding an attorney practicing since 2009 an hourly rate of \$350 in an FLSA overtime matter); *De Armas v. Miabraz, LLC*, 2013 U.S.

Dist. LEXIS 116381, *3-4 (S.D. Fla. Aug. 16, 2013) (finding hourly rates of \$300-350 an hour reasonable for attorney's practicing labor and employment law for the last 7-9 years); *Ismael v. Plantation Key Operating Co., LLC*, 2019 U.S. Dist. LEXIS 20355, *2-3 (S.D. Fla. Feb. 1, 2019) (finding \$450 an hour in FLSA case to be reasonable and citing *CCAventura, Inc. v. Weitz Co.*, 2008 U.S. Dist. LEXIS 7214 (S.D. Fla. 2008), for the proposition that a \$400 per hour rate for an eighth year associate is appropriate).

18. I oversaw the team of attorneys and paralegals who had the responsibility to interview plaintiffs in preparation of filing the complaint and prepare draft pleadings and motions including Plaintiffs' Motion for Collective and Class Action Certification. I also oversaw the work of the paralegals who, among other things, communicated directly with Plaintiffs and provided translation services. As a result of my role, I am familiar with the services performed and expenses incurred on behalf of the plaintiffs. I have carefully examined the billing records which were created on a contemporaneous basis regarding legal services and hours of work, as well as expenses incurred.

19. As much as practicable, as lead Plaintiffs' Counsel, I ensured that associates with lower hourly billing rates performed all of the work that they were fully capable of performing rather than having partners perform such work. For example, Associate Sarah M. Block performed 176.5 hours of work, whereas Managing Partner Gregory K. McGillivray performed only 21.2 hours of work on the case over its lifetime.

20. All of the time and expenses set forth in this declaration have been necessarily and reasonably expended on behalf of the Plaintiffs in this action. Additionally, Plaintiffs' Counsel made a good faith effort to exclude hours that were excessive, redundant, or otherwise unnecessary.

21. MSE has a total of seventeen attorneys and, for that reason, must carefully monitor the amount of time required by existing cases in determining whether to accept or pursue other matters. This case required substantial time and effort. This precluded me, and the other attorneys who worked on this case, from performing other available fee-generating work during the relevant period of time; this was a factor considered by our firm in deciding what fee-generating cases and other matters it could, and could not, pursue during this time frame. Through May 27, 2020, I performed a total of 97.7 hours on this case. This does not include any time spent preparing the Motion for Settlement Approval or the time I will continue to spend working with Cotton's counsel to administer the Settlement Agreement.

22. Plaintiffs have continued to incur additional fees and expenses in connection with resolving the case with Cotton, including through the drafting of the Settlement Agreement and instant Motion for Approval and in communicating with Plaintiffs regarding the Settlement.

23. I have over 15 years of civil litigation experience with particular emphasis in wage and hour collective and class actions on behalf of employees in FLSA and other wage cases.

24. I am serving or have served as lead counsel or co-lead counsel in numerous multi-plaintiff FLSA actions. *See, e.g., Perry et al. v. City of New York*, Case No. 13-01015 (S.D.N.Y.) (FLSA collective action involving off the clock and regular rate claims of over 2600 EMTs and Paramedics); *Anderson, et al. v. United States*, 17-CV-01199 (Fed. Cl.) (FLSA and Title 5 action on behalf of Security Guards and Police Officers employed with the National Guard Bureau); *Armwood, et al. v. United States*, 17-CV-01839 (Fed. Cl.) (FLSA action involving unpaid work and regular rate violations on behalf of Police Officers employed with the Office of Naval Intelligence); *Battaglini, et al. v. Cnty. of Arlington*, Case No. 16-CV-00990 (E.D. Va.) (FLSA

case on behalf of fire captains); *Wilson, et al. v. City of Alexandria*, Case No. 16-CV-00990 (E.D. Va.) (FLSA case on behalf of fire captains).

25. In addition, I was co-counsel for the following multi-plaintiff lawsuits and collective actions involving enforcement of wage and hour laws: *Conzo et al. v. City of New York* and *Aarons et al. v. City of New York*, Case Nos. 05-CV-705 and 09-CV-10138 (S.D.N.Y.) (FLSA collective action involving off-the-clock and regular rate claims for EMTs and Paramedics; favorable settlements approved by court in 2011 following decisions on summary judgment); *Mullins et al. v. City of New York*, Case No. 04-CV-2979 (S.D.N.Y.) (collective action on behalf of New York Police Sergeants who were improperly classified); *Thompson, et al. v. DirecTV, et al.*, CA 3:07-cv-4112 (M.D. Tenn.) (FLSA collective action involving off-the-clock claims of 1400 technicians who installed DirecTV satellite dishes and equipment); *Morrison v. Fairfax Cnty., Va.*, Case No. 1:14-cv-0005 (FLSA case alleging fire captains are first responders entitled to overtime pay); *Abadeer, et al. v. Tyson*, C.A. No. 3:09-cv-00125 (M.D. Tenn.) (FLSA/Rule 23 hybrid for unpaid donning and doffing performed by hourly-paid meat processing workers at Tyson's Goodlettsville plant; \$7,750,000.00 settlement following summary judgment rulings).

26. I have also served as counsel for AFGE Locals and bargaining unit employees nationwide in FLSA grievances brought by the Locals against the Bureau of Prisons ("BOP") involving the BOP's failure to pay overtime pay as required by the FLSA for work performed by correctional officers prior to and following their scheduled shifts and during unpaid meal periods, collecting millions of dollars for BOP workers.

27. The attorneys at MSE exclusively represent employees and unions and specialize in wage and hour cases. For example, in 2009, with other MSE partners and attorneys, I represented a Rule 23 class composed of more than 4,000 employees of Tysons Food, Inc. who did not receive

pay for all hours worked and secured a beneficial settlement agreement. Similarly, I have served as class counsel in a Rule 23 action in the District of Columbia Superior Court, representing hundreds of home health care workers alleging violations of the District of Columbia wage and hour laws.

28. I am a 2004 graduate of University of Michigan Law School. I am a member in good standing of the bars of New York (2005) and the District of Columbia (2006), as well as the U.S. Supreme Court (2010). I am also a member of the bars of the United States District Courts for the District of Columbia, Southern District of New York, Eastern District of New York, and Colorado, the United States Court of Federal Claims, and the bars of four Federal Courts of Appeal.

29. I am the current Union Chair of the American Bar Association's Labor and Employment Law Section sub-committee on the Family and Medical Leave Act, part of the Committee on Federal Labor Standards Legislation, and have served as a track coordinator for the Litigation and Class Action track of the ABA's Annual Labor and Employment Law Conference since 2018.

30. I am regularly invited to speak on wage and hour panels and webinars for various legal associations. For example, I served as a panelist at the 2018 Annual ABA Labor and Employment Law CLE Conference on a panel discussion of Litigating Collective Actions and spoke as a panelist at the 2017 Annual ABA Labor and Employment Law CLE Conference on the best practices with respect to FLSA settlements. Some other panels and speaking engagements include:

- a. Panelist for the AFL-CIO's 2019 LCC Mid-Career Lawyering Seminar.
- b. Panelist for the 2015 Annual ABA Labor and Employment Law CLE Conference on the ethics issues in collective litigation of cases involving low-wage workers.

- c. Webinar speaker for the American Law Institute CLE on FLSA “late breaking” developments, including *Encino Motorcars v. Navarro* and the Department of Labor’s PAID program.
- d. Webinar speaker for the ABA on wage and hour topics for new practitioners.

31. Gregory McGillivray, MSE’s managing partner, spent a total of 21.2 hours on this case. Mr. McGillivray has over 30 years of experience, specializing in pay cases arising under the Fair Labor Standards Act (FLSA) and state wage and hour laws, and has participated in the successful litigation of over 200 FLSA suits on behalf of employees in various proceedings throughout the country, including in U.S. federal courts and at arbitration, with the majority of these cases involving public sector employees. For example, he represented two of the largest Rule 23 classes ever in *Matsuo v. United States*, 532 F. Supp. 2d 1238 (D. Haw. 2008), in arguing that Federal employees in Alaska and Hawaii should be eligible for pay that was available to employees in the contiguous 48 states.

32. Mr. McGillivray is on the Board of Editors of Bloomberg/BNA’s publication of a treatise on the Fair Labor Standards Act entitled “The Fair Labor Standards Act” and prepares the annual supplements to that treatise, which is the byproduct of a joint collaboration between Bloomberg/BNA books and the Labor and Employment Section of the American Bar Association. He also serves as Editor-in-Chief of a treatise on state wage and hour laws entitled “Wage and Hour Laws,” which is published by Bloomberg/BNA books and is a byproduct of a joint collaboration between Bloomberg/BNA books and the Labor and Employment Section of the American Bar Association. The treatise covers the state wage and hour laws of all fifty states plus the District of Columbia and Puerto Rico.

33. In November 2017, Mr. McGillivary was inducted into the College of Labor and Employment Lawyers as a Fellow. The College of Labor & Employment Lawyers is a non-profit professional association that honors leading lawyers nationwide in the practice of Labor and Employment law.

34. Sarah M. Block has been an associate attorney with the firm since June 2015, representing employees and unions in nationwide FLSA, wage and hour, and first amendment litigation and arbitration. She also provides general legal advice on labor relations and employment issues. Prior to joining the firm, Ms. Block worked as an associate attorney for a small firm in Washington, D.C. primarily representing transportation unions. Ms. Block graduated from The George Washington University Law School in 2014, where she served as the Senior Articles Editor of The Federal Circuit Bar Journal. She also holds a B.A. in History (with honors) and Spanish, *summa cum laude*, from Bucknell University. She is a member in good standing of the bars of the State of New York and the District of Columbia, as well as of the bars for the U.S. District Courts for the Southern District of New York, Eastern District of New York, Western District of New York, District of Colorado, District of the District of Columbia, and the Court of Federal Claims. As of May 27, 2020, Ms. Block spent a total of 176.5 hours in the litigation of this matter.

35. Associate Hillary D. LeBeau joined McGillivary Steele Elkin LLP in August 2016. She represents unions and employees in a variety of cases and provides general legal advice on labor relations and employment issues. Her litigation focus since joining the firm has been in the FLSA and Wage and Hour arena. LeBeau graduated from Cornell Law School in 2016. She was the 2016 recipient of the Stanley E. Gould Prize for Public Interest Law. She graduated from DePaul University with honors in 2011, with a degree in American Studies. She is a member in good standing of the State Bars of District of Columbia and New York, and is a member in good

standing of the bars of the United States District Courts for the District of Columbia, Southern District of New York and Eastern District of New York. Ms. LeBeau spent a total of 3.1 hours in the litigation of this matter.

36. Ryan Cowdin joined McGillivray Steele Elkin LLP in September 2019 as an associate attorney. He represents unions and employees and provides general legal advice on labor relations and employment issues. Prior to joining the firm, Ryan served as a Law Clerk to an Associate Judge at the D.C. Superior Court. He also worked as a Judicial Fellow to the Chief Judge of the D.C. Court of Appeals. Ryan graduated from The George Washington University Law School in 2016, where he was an Articles Editor for the Federal Circuit Bar Journal. He also graduated with a B.A., cum laude, from Loyola University New Orleans in 2011. He is licensed to practice law in Virginia. Mr. Cowdin spent a total of 16.3 hours in the litigation of this matter.

37. Keith Nickerson is the Litigation Director at McGillivray Steele Elkin LLP. He assisted in reviewing and summarizing pay and hours worked data in this matter and preparing damages models for Plaintiffs' Statement of Claim (Dkt. 19) and for settlement negotiations. He has a Master's in Business Administration from the University of Maryland, which he received in 2001, and he is a 1989 graduate of the University of Rochester. From July 5, 1989, to July 5, 1999, he was a paralegal with the firm, and from October 1, 2001, to October 1, 2002, a consultant. Since July 2004, he has been the Litigation Director for the firm. In large wage and hour actions he is responsible for conducting data analysis related to pay issues and preparing spreadsheets and reports on the results of his analysis. In addition, he supervises the litigation paralegals and off-site consultants who may assist him with these data analysis projects. Over the course of over 20 years with McGillivray Steele Elkin, he has prepared calculation spreadsheets and damages models showing amounts owed in over 400 multi-plaintiff and multi-grievant cases involving wage and

hour claims and he has testified about such calculations in multiple cases. In addition, Mr. Nickerson was recognized by U.S. District Judge Richard Sullivan for his work as an expert in damage calculations in an FLSA case, *Boucaud, et al. v. The City of New York*, No. 07 Civ. 11098 (S.D.N.Y.). Mr. Nickerson spent a total of 9.1 hours on this case.

38. The remaining individuals listed in Exhibit A worked as paralegals for McGillivray Steele Elkin LLP and performed traditional paralegal work in this case, including translating documents and communications with Plaintiffs from Spanish to English and vice versa; preparing declarations and exhibits for filing; responding to plaintiff inquiries about the status of the case; obtaining information from plaintiffs concerning their employment; preparing *pro hac vice* motions; making telephone calls and sending WhatsApp messages to plaintiffs regarding settlement issues; and responding to plaintiff emails about the case. They also assisted with preparing the Complaint, Amended Complaint, and opt-in forms for filing. Combined, they spent a total of 107.2 hours working on this case.

39. Counsel Kerry A. O'Brien and the Resilience Force Justice Project are dedicated to advocating for the rights of disaster relief workers nationwide. Ms. O'Brien is a co-founder of the D.C. Employment Justice Center and has counseled and represented low-wage workers in wage and hour and other cases for more than 20 years at Bread for the City, the Service Employees International Union, and CASA de Maryland. Ms. O'Brien was a presidential appointee at the U.S. Department of Labor, where she served as Senior Counsel to the Solicitor 2015 to 2017 and where she focused on wage and hour issues. She is a 1998 cum laude graduate of Georgetown University Law Center. Ms. O'Brien spent a total of 43.8 hours on this case.

40. Matthew J. Mierzwa, Jr., is the principal of Mierzwa & Floyd, P.A., which represents labor organizations, employee benefit plans, and union members in the areas of labor

law, employee benefit law, and election law throughout the State of Florida. Mr. Mierzwa has been involved in the representation of labor unions and employee benefit funds for more than 30 years. Mr. Mierzwa also represents public employee and ERISA benefit funds including pension, health and welfare, retiree insurance, and joint apprenticeship training funds. Mr. Mierzwa graduated from Harvard College in 1977, cum laude, in Economics and received his Juris Doctor, magna cum laude, from the University of Miami School of Law. Mr. Mierzwa is a member in good standing of The Florida Bar and is admitted to practice in the United States Court of Appeals for the Eleventh Circuit and for the United States District Courts for the Southern and Middle Districts of Florida. Mr. Mierzwa spent 1.75 hours working on this case.

41. Erin F. Medeiros is an associate attorney of Mierzwa & Floyd, P.A., which represents labor organizations, employee benefit plans, and union members in the areas of labor law, employee benefit law, and election law throughout the State of Florida. Prior to joining Mierzwa & Floyd, P.A. in 2018, Ms. Medeiros worked for nearly four years as an associate attorney with the Previant Law Firm, S.C. in Milwaukee, Wisconsin where she represented employees and public and private sector unions. At Previant, the litigation portion of Ms. Medeiros's practice was in employment discrimination law and the FLSA and Wage and Hour arena. Ms. Medeiros graduated from Providence College in 2006 and Howard University School of Law in 2013. She is a member in good standing of The Florida Bar and is admitted to practice in the United States District Courts for the Southern and Middle Districts of Florida. Ms. Medeiros spent a total of 27.1 hours on this case.

42. **Exhibits D and E** is a listing of actual expenses incurred by the classes that were advanced in full by Plaintiffs' Counsel. As of May 27, 2020, the total expenses incurred by McGillivray Steele Elkin LLP were \$3,133.98. The total expenses incurred by Mierzwa & Floyd

were \$780.25. The categories of expenses listed in Exhibits D and E are the type normally billed to our paying clients. All expenses were reasonably and necessarily incurred in pursuing this case to a successful settlement.

I declare under penalty of perjury, pursuant to 28 U.S.C. Section 1746, that the foregoing is true and correct.

Dated: June 15, 2020

/s/ Sara L. Faulman
Sara L. Faulman
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Attorney for Plaintiffs

Exhibit A

McGILLIVARY STEELE ELKIN LLP
Summary of Attorneys' Fees
Report Period: 07/18/2019 to 05/27/2020

Miscellaneous
Cotton

Gregory McGillivary

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2019	400	19.30	\$7,720.00
2020	400	1.90	\$760.00
Sub Total:			\$8,480.00

Sara Faulman

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2019	350	46.60	\$16,310.00
2020	350	51.10	\$17,885.00
Sub Total:			\$34,195.00

Sarah Block

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2019	275	109.70	\$30,167.50
2020	275	66.80	\$18,370.00
Sub Total:			\$48,537.50

Hillary LeBeau

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2019	250	3.10	\$775.00
Sub Total:			\$775.00

Ryan Cowdin

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2019	250	16.30	\$4,075.00
Sub Total:			\$4,075.00

Keith Nickerson

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2019	125	9.10	\$1,137.50
Sub Total:			\$1,137.50

Sandy Patel

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2019	125	7.70	\$962.50
2020	125	0.40	\$50.00
Sub Total:			\$1,012.50

Kathleen Dacruz

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2019	125	57.20	\$7,150.00
2020	125	34.40	\$4,300.00
Sub Total:			\$11,450.00

Charisma Hunter

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2019	125	3.70	\$462.50
2020	125	2.80	\$350.00
Sub Total:			\$812.50

Mary O'Brien

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2019	125	1.00	\$125.00
Sub Total:			\$125.00

Total: \$110,600.00

Expenses: \$3,133.98

Grand Total: \$113,733.98

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Gregory McGillivary**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
7/25/2019	0.50	Review email from Kerry; emails about retainer and moving case forward.
7/30/2019	0.60	Review and revise consent form; email about same.
7/31/2019	0.50	Emails regarding revising consent retainer and ethical rules on same; revise co-counsel agreement; office conference re same.
8/1/2019	0.60	Revise retainers; emails with Kerry about who will join case and strategy on same.
8/7/2019	0.20	Email from Kerry regarding additional support for case.
8/8/2019	0.20	Emails regarding retainer and sign-ups.
8/12/2019	0.20	Email about translation question.
8/14/2019	0.40	Emails regarding translation.
8/16/2019	0.40	Emails with Sarah about consent forms and sending to Kerry.
8/19/2019	0.40	Emails regarding translation of consent and rules on same.
8/20/2019	0.50	Emails regarding local counsel; emails about filing strategy and website info.
8/21/2019	1.10	Emails regarding notice on website; review and revise same; email to Kerry about possible dangers of posting before filing.
8/22/2019	1.60	Review and revise notice; emails about strategy and timing; email to Kerry about facts necessary for us to file.
8/26/2019	0.80	Conference about filing and Florida min wage claims; emails about timing of complaint; research rule on amendments.
8/27/2019	0.30	Office conference re agreement letter.
8/30/2019	0.40	Conferences with Sara about local counsel and filing; email from Sarah about complaint.
9/3/2019	0.80	Review and revise complaint; emails regarding counts and check bouncing issue.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Gregory McGillivary**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
9/4/2019	0.60	Emails regarding additional information, changes to complaint, and facts; conference about service and conference about bad check laws in Florida and how to pursue.
9/5/2019	1.20	Emails regarding complaint and changes to same; conference with Sara about press coverage and impact on case.
9/6/2019	2.20	Review changes to complaint; research retaliation law in 11th Circuit and add adverse employment action; phone call with Kerry about process for filing; review email about bad check law in Florida; conference with Kerry about immigration retaliation; texts with Sara about brief.
9/9/2019	0.30	Emails and conference with Sarah about filing being postponed
9/24/2019	0.40	Emails regarding case strategy and notice of claim.
9/25/2019	0.60	Emails with Sara and Sarah about case strategy; eagerness by Cotton to settle; calculation of damages.
9/28/2019	0.60	Conference with Sara and Sarah about strategy and offer to defendant to settle; review Kerry emails about draft letter to clients.
9/30/2019	0.40	Conference with Sara about settlement; emails about attorney fees.
10/3/2019	0.40	Review emails about plaintiff damage calculations.
10/7/2019	0.90	Revise notice of claim; emails regarding punitive damages and review Kerry email.
10/8/2019	0.20	Email with Hillary about amending complaint to add contract claim; email about same.
10/11/2019	0.50	Emails regarding news article; review same; emails about motion to amend.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Gregory McGillivary**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
10/15/2019	0.20	Emails about settlement demand.
11/19/2019	0.40	Review settlement letter and conference with Sara about same.
12/9/2019	0.20	Conference with Sara about possible settlement and whether employer will agree to notice or we will have to brief it.
1/8/2020	0.20	Emails regarding new company buying out Cotton and amending complaint to address.
2/25/2020	0.40	Phone conference with Sara about settlement and counter; review email about same to Kerri.
3/31/2020	0.50	Review emails; participate in phone conference with Sara and Sarah about strategy and possible settlement.
4/27/2020	0.60	Review and revise plaintiff letter and email about same to Sarah and Sara.
5/21/2020	0.20	Phone conference with Sara about taxation of funds issues for plaintiffs.

McGILLIVARY STEELE ELKIN LLP

SERVICES PERFORMED BY

Sara Faulman

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
7/31/2019	0.60	Edit and revise retainer / co-counsel agreements; discuss same with office; correspondence with co-counsel regarding same.
8/1/2019	0.40	Edit and revise retainer agreements.
8/13/2019	0.30	Discussions with co-counsel regarding consent forms and strategy.
8/19/2019	1.10	Research on foreign language issues and related matters for consent form; correspondence with office regarding same.
8/22/2019	0.80	Analyze claim letter and discuss that and complaint filing with office; correspondence with co-counsel regarding same; review information on putative plaintiffs.
8/23/2019	0.30	Analyze consent forms and correspondence with co-counsel and office.
8/26/2019	0.60	Analyze correspondence from co-counsel regarding potential claims and discuss same with office; correspondence with potential local counsel regarding relationship.
8/27/2019	1.30	Prepare for and participate in local counsel discussion; draft agreement letter to same; discuss with GKM.
8/30/2019	0.90	Review file and correspondence with potential local counsel; analyze consent form information provided by office; discussion with co-counsel about filing issues and draft update to office; office discussion regarding same.
9/3/2019	0.90	Edit Complaint and send feedback / instructions to office regarding complaint and local counsel.
9/3/2019	3.30	Edit and revise complaint and notices; office discussion and research regarding entities to sue; research FLSA retaliation and correspondence with local counsel; draft letter to new local counsel; initial research and office assignment regarding potential additional Florida claims; research on potential tax law claims.

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Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
9/4/2019	1.40	Analyze suggested edits to complaint; office discussions regarding amended claims and complaint.
9/5/2019	2.10	Office and co-counsel discussions regarding filing complaint; additional edits to and revisions of Complaint and notices.
9/6/2019	2.30	Additional edits and revisions to Complaint and office / co-counsel correspondence regarding same.
9/9/2019	0.70	Telephone call with co-counsel and draft follow-up emails / assignments to office regarding same.
9/13/2019	0.30	Correspondence with office and Florida contact regarding process servers.
9/16/2019	0.50	Email discussions with office and co-counsel regarding filing issues and notice issues.
9/17/2019	0.70	Review of filing materials and communications from local counsel; review information on court practices and procedures.
9/19/2019	0.60	Prepare for and participate in conference call with opposing counsel regarding case.
9/20/2019	0.30	Analyze letter from defendants and email correspondence with office regarding same.
9/25/2019	0.20	Review information on summonses.
9/27/2019	0.90	Office discussion regarding case status; edit and revise documents; email discussion with co-counsel.
9/30/2019	0.30	Correspondence with co-counsel regarding new plaintiffs; assignment to office regarding rep letters; office discussion with GKM about settlement.
10/2/2019	1.10	Review and edit statement of damages; review email from opposing counsel and draft response; communications with office regarding same.
10/3/2019	0.20	Email to opposing counsel.

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Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
10/15/2019	0.30	Review information from office and email to same regarding settlement demand.
10/29/2019	1.30	Analyze file and prepare for and participate in office conference regarding next steps; initial review of materials for settlement demand; correspondence with opposing counsel regarding additional consents.
11/4/2019	2.20	Analyze court order on deadlines and prepare for and participate in office meeting on status and upcoming issues; office / co-counsel telephone discussion of case status; edit and revise settlement demand.
11/5/2019	0.60	Analyze question from defense counsel and legal research / office discussions regarding response to same.
11/6/2019	0.90	Prepare for and participate in telephone call with opposing counsel and update to office; edit letter on claims for additional plaintiffs; initial review of Cotton response to statement of claim.
11/7/2019	0.30	Finalize and approve claim letters for distribution.
11/7/2019	0.40	Correspondence regarding service of defendant Paz and agencies.
11/13/2019	0.80	Review information re: declarations and discuss strategy with office; email correspondence with co-counsel.
11/14/2019	0.20	Office discussions regarding class certification briefing; correspondence with co-counsel regarding settlement.
11/15/2019	0.40	Office / co-counsel communications about strategy meeting and service of additional defendants.
11/18/2019	1.30	Prepare for and participate in conference call with co-counsel regarding class / collective motions; follow-up email discussions with co-counsel and office regarding service on Paz.
11/19/2019	0.70	Review affidavits and other information from process server; final edits to settlement demand.

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Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
11/20/2019	1.60	Analyze defendant answer; further edits and revisions to notice letters; further revisions to class / collective certification declarations; discuss same with office; office discussion regarding contact by registered agent.
11/21/2019	0.60	Prepare for and participate in conference call with opposing counsel; send settlement demand.
11/26/2019	0.90	Editing First Amended Complaint.
11/27/2019	0.30	Review information from co-counsel for First Amended Complaint.
12/2/2019	0.60	Discuss issue with plaintiff signatures with office and with co-counsel.
12/3/2019	0.80	Analyze suggested edits to Amended Complaint and further correspondence with co-counsel and office.
12/5/2019	0.80	Edit and revise declaration in support of motion for class certification.
12/6/2019	1.80	Edit and revise collective / class action motions and related notices; discuss same with office; telephone call with defendant.
12/6/2019	2.30	Edit and revise motion for conditional / class certification, edit and revise Joint Scheduling Agreement; conferences with office regarding changes to notice.
12/9/2019	2.60	Conference with GKM regarding possible settlement; prepare for and participate in conference call with defendant regarding class cert, scheduling order, and potential settlement; revise and edit notice for class / collection action and other related materials; revise and edit joint scheduling Order; analyze declaration from client.
12/16/2019	0.40	Office / co-counsel discussions and emails regarding service of Paz and notice to Court.
12/23/2019	0.30	Office discussions regarding filing of brief.
12/30/2019	1.30	Initial review of opposition brief and discuss strategy for reply with office.

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Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
12/31/2019	0.40	Correspondence with co-counsel regarding reply brief; discuss issue for reply brief with SMB.
1/2/2020	2.70	Analyze cases cited by defendant in support of class certification opposition and edit reply brief; office correspondence regarding same.
1/6/2020	0.30	Finalize reply brief.
1/10/2020	0.60	Edit witness list.
1/16/2020	0.20	Edit statement of witnesses.
1/27/2020	0.20	Analyze Court order and discuss same with office.
1/28/2020	0.60	Edit motion and affidavit and discuss local counsel issue with office.
1/29/2020	0.20	Review Court order and begin preparing assignment for motion hearing.
1/30/2020	0.40	Assignment to office regarding motion on conditional certification / notice.
2/19/2020	0.80	Prepare for and participate in conference call with opposing counsel; calls with SMB regarding follow-up to same.
2/24/2020	0.50	Analyze pay data provided by defendant and initial review of settlement counter.
2/25/2020	1.20	Analyze settlement counter from defendant, discuss with office, and draft proposed response.
2/27/2020	0.60	Review response from Kerry on settlement demand and research and provide response regarding same.
2/27/2020	3.20	Prepare for hearing on motion for conditional certification.
2/28/2020	6.30	Prepare for and participate in court hearing on motion for conditional certification; meeting with opposing counsel on potential settlement / mediation; draft client updates on same.

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Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
3/3/2020	0.20	Review information from clients and discuss same with co-counsel.
3/5/2020	0.80	Edit request to go to mediation; office communication regarding additional plaintiffs.
3/9/2020	0.40	Analyze defendant proposed joint order and discuss with office; office communication regarding additional plaintiff consents.
3/12/2020	0.40	Review court order and discuss with office response to same; edit same.
3/16/2020	0.90	Prepare for and participate in telephone conference with office and opposing counsel regarding discovery and settlement issues.
3/17/2020	0.40	Office correspondence regarding mediation.
3/18/2020	1.10	Edit deposition notices; communication with opposing counsel about mediation dates / informal settlement; status update to co-counsel; review proposed edits to 30(b)(6) and office correspondence regarding additional witness.
3/19/2020	0.90	Correspondence with SMB and KO regarding additional deponent and finalizing depo notices; initial review of defendant discovery requests; initial review of defendant counter-offer.
3/20/2020	1.30	Prepare for and participate in call on how to move settlement along; additional email to opposing counsel regarding same.
3/23/2020	0.30	Correspondence with trial team on settlement issues.
3/24/2020	1.20	Prepare for and participate in conferences with office and co-counsel regarding settlement; additional correspondence with opposing counsel regarding same.
3/25/2020	0.50	Prepare for and participate in call with opposing counsel regarding settlement.

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Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
3/27/2020	0.70	Telephone conference with opposing counsel; draft email update to team; review file and assignment to office regarding settlement issue.
3/30/2020	0.60	Prepare for and participate in call with KO and SMB regarding settlement efforts.
3/31/2020	0.60	Office discussions regarding settlement strategy.
4/1/2020	0.40	Message with Cotton counsel regarding settlement; correspondence with office / co-counsel regarding same.
4/2/2020	0.40	Office correspondence regarding meeting prep.
4/3/2020	1.10	Prepare for telephone call with litigation team and participate in same; edit outline for translation for Sunday trial team meeting.
4/6/2020	1.30	Review plaintiff correspondence and notes from co-counsel regarding same; telephone conference with SMB regarding damages chart and edit and revise same.
4/7/2020	1.10	Trial team discussions regarding settlement issues and plaintiff questions; discussion with opposing counsel regarding same.
4/8/2020	0.80	Revise information for plaintiffs regarding potential settlement and office discussions regarding same; telephone call with counsel for Cotton.
4/9/2020	2.70	Prepare for and participate in telephone calls with plaintiffs regarding proposed settlement; follow up discussions / correspondence with office; analyze additional information provided by plaintiffs and draft responses.
4/10/2020	0.90	Emails and other correspondence to trial team about potential settlement; analyze information from plaintiffs to prepare responses to same.

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Miscellaneous
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DATE	HRS WORKED	DESCRIPTION
4/13/2020	0.20	Review correspondence from plaintiff and draft assignment to office regarding same.
4/14/2020	0.80	Prepare for and participate in conference with trial team; draft responses to plaintiffs; prepare for and participate in call with opposing counsel.
4/15/2020	0.60	Correspondence with plaintiffs regarding settlement; office correspondence re same
4/17/2020	0.30	Email discussion with co-counsel regarding settlement
4/20/2020	0.90	Analyze plaintiff communication and prepare for settlement discussion with opposing counsel; participate in same; edit letter to plaintiffs; discussion with office regarding plaintiff calls and negotiation status
4/24/2020	0.20	Communications with opposing counsel regarding settlement.
4/27/2020	0.70	Telephone calls with opposing counsel regarding settlement and assignment to office regarding same; office correspondence re case status and plaintiff letter
4/28/2020	1.20	Analyze new damages based on agreed-upon number; draft response to opposing counsel regarding additional settlement terms; analyze recent orders by Court in FLSA actions and edit notice to the Court; office correspondence re case status
4/30/2020	1.70	Prepare for and participate in telephone conference with plaintiff; correspondence with opposing counsel regarding settlement; finalize court filing; analyze court order on upcoming deadlines and office discussion regarding same
5/4/2020	0.20	Office discussion / correspondence regarding next steps for settlement
5/5/2020	0.80	Edit and revise settlement agreement; discuss same with office
5/6/2020	0.40	Review client correspondence / questions regarding settlement and discussions (phone and email) with office regarding same

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Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
5/7/2020	0.50	Analyze potential edits to settlement agreement and office emails regarding same
5/8/2020	0.40	Default Motion: review law on default and email assignment outline to office for briefing
5/8/2020	0.70	Further edits to settlement agreement; review notes from plaintiff discussion; email discussions with team
5/11/2020	0.60	Additional edits to settlement agreement; analyze plaintiff responses to distribution; email to opposing counsel
5/12/2020	0.30	Analyze notes from plaintiff calls
5/12/2020	0.60	Prepare for and participate in call with office regarding default motion; follow up assignment to same
5/15/2020	1.10	Analyze defendant edits to settlement agreement, talk to SMB regarding same; review our edits to same
5/18/2020	0.40	Analyze co-counsel suggested edits to settlement agreement, incorporate into agreement; email with opposing counsel.
5/21/2020	0.70	Discuss settlement issue with GKM; prepare for and participate in conference call with opposing counsel; discuss same with SMB.
5/22/2020	0.40	Analyze defendant changes to settlement agreement and discuss same with SMB.
5/26/2020	0.30	Further edits to settlement agreement and draft email to opposing counsel regarding same.
5/27/2020	0.30	Correspondence with opposing counsel and SMB regarding settlement.

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Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
7/22/2019	1.20	Review background memo, conference with Kerry O'Brien regarding Hurricane Irma wage claims in FL.
7/24/2019	0.50	Draft potential co-counsel agreement in Cotton case for Hurricane Irma clean-up workers.
7/25/2019	0.20	Office conference and correspondence regarding co-counsel agreement, case background in Cotton case.
7/26/2019	0.60	Draft Co-Counsel and Retainer agreement for Hurricane Irma worker Cotton/SSPS case.
7/31/2019	0.30	Review co-counsel agreement and consent retainer, correspondence re same.
8/1/2019	1.00	Revise co-counsel and consent-retainer agreements, office correspondence re same.
8/8/2019	0.20	Revise consent form and correspondence re same.
8/14/2019	0.20	Research and correspondence regarding complaint.
8/15/2019	4.60	Review translated consent form, draft complaint, research re employer names and corporation registration; research and draft complaint.
8/16/2019	2.70	Finalize consent retainers; research and draft complaint .
8/19/2019	0.40	Correspondence with co-counsel regarding retainer forms, office conference re same.
8/20/2019	1.50	Office conference and correspondence re docusign, statute of limitations and complaint; draft notice of claim.
8/21/2019	0.90	Research and draft notice of claim, correspondence re same; review and revise language for website.
8/22/2019	2.30	Research and revise notice of claim, research and correspondence regarding consent forms and information needed for complaint, local counsel.
8/23/2019	0.40	Office conference regarding consent forms, information from plaintiffs.

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Cotton

DATE	HRS WORKED	DESCRIPTION
8/26/2019	0.70	Phone conference with local counsel re filing deadline; office conference with paralegal re consent forms. correspondence re same.
8/27/2019	0.20	Office conference re notice of claim, local counsel.
8/30/2019	1.00	Draft complaint; office email re same.
9/3/2019	3.80	Revise Complaint, office conference re verifying complaint information; revise notice of claim and draft bad check notice of claim, office conference re same; research re FLSA retaliation and immigration reporting, correspondence re same.
9/4/2019	2.80	Research re filing under pseudonyms, review documents and correspondence re complaint draft; office conference re information to include in complaint; revise draft complaint; conference with paralegal re call assignment.
9/5/2019	2.00	Revise complaint and notice of claim, correspondence re same; research and office conference re bad check claims, finalize notice re same.
9/6/2019	4.00	Review complaint and correspondence re same; finalize and submit notices of bad check and FMWA claims; draft civil cover sheet and summons; finalize documents for complaint filing; prepare pro hac vice filings.
9/9/2019	0.40	Office conference re complaint status and correspondence re same.
9/10/2019	0.20	Correspondence with local counsel and co-counsel regarding complaint status, filing timeline.
9/12/2019	0.80	Office conference and correspondence with local counsel regarding notices of claim, process servers.
9/13/2019	0.70	Phone conference with local counsel regarding complaint, process servers; research re Tampa process servers and office conference re same.
9/16/2019	0.70	Office conference and correspondence re process servers, correspondence re complaint filing.

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Cotton

DATE	HRS WORKED	DESCRIPTION
9/17/2019	0.80	Revise summons and conference with local counsel regarding filing.
9/23/2019	0.50	Review filings and summons, correspondence re same.
9/24/2019	1.70	Draft and submit waiver of service form, draft pro hac vice application and correspondence re same; review orders and correspondence re case status; correspondence with process server re summons and notices.
9/25/2019	1.50	Phone conference with process server regarding summons and notices; correspondence with local counsel and office regarding waiver of service and pro hac vice applications; office conference re case status and service; draft plaintiff rep letter.
9/26/2019	0.80	Check docket, correspondence re status of pro hac vice application; draft certificate of interested parties.
9/27/2019	1.20	Office conference re case strategy, upcoming filings; finalize certificate of interest; draft statement of claims and correspondence re damages calculations; review draft of translated representation letter.
10/1/2019	2.50	Research re FL attorneys fees, finalize and submit for filing statement of interested parties; correspondence with local counsel re fees; revise Spanish version of rep letter; office conference re damages calculations; draft statement of claim.
10/2/2019	1.20	Draft and revise statement of claim and correspondence re damages calculations, correspondence re case strategy; correspondence re fee research.
10/3/2019	0.20	Correspondence re statement of claim, damages calculations.
10/4/2019	1.00	Edit statement of claim and review damages calculations.
10/28/2019	0.20	Office conference re case status, process server update.

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DATE	HRS WORKED	DESCRIPTION
10/29/2019	1.00	Office conference re case status, upcoming deadlines, strategy, attorneys' fees; review settlement demand draft and damages calculations.
10/30/2019	0.40	Office conference re new plaintiff claims; correspondence with co-counsel regarding next steps, phone conference.
11/4/2019	4.50	Office conference re case strategy and upcoming deadlines; revise settlement offer; prepare agenda for upcoming team conference call; draft notice of claim for new plaintiffs; draft amended complaint; correspondence with plaintiffs regarding claims.
11/5/2019	2.00	Office correspondence re Amended Complaint, correspondence with plaintiffs; research re amendment as of right and where multiple defendants.
11/6/2019	1.80	Office conference re amended complaint and strategy, correspondence with plaintiffs; revise notice of claim and amended complaint draft, template declaration.
11/7/2019	0.80	Revise and submit Cotton second notice of claim; correspondence with co-counsel re service addresses and locating defendants; contact process server re status of service.
11/12/2019	0.30	Office conference re service status, motion for class certification; draft amended complaint.
11/13/2019	2.20	Phone conference with process server and office conference, follow-up correspondence re same; prepare template declarations for Rule 23 and 216(b) motions; review documents; correspondence re meetings and declarations.
11/14/2019	3.00	Revise declaration templates, research and draft Rule 23 and collective action motion; office conference re declarations, status of service; review email to process server re affidavit.
11/15/2019	0.80	Phone conference with process server re status and follow-up office conference, correspondence re same.

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Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
11/18/2019	0.60	Team phone conference re status, declarations, upcoming deadlines; review documents regarding Paz contact.
11/20/2019	3.70	Revise Notices of Claim for SSPS, VCDP; update notes and declarations; office conference re service of process and next steps and correspondence re same; review answer; update docket.
11/22/2019	3.00	Draft First Amended Complaint, office conference re affidavit of service; phone conference with process server re affidavits; research and draft collective and class action motion.
11/25/2019	2.40	Research and draft Rule 23 and 216(b) motion; phone conference with process server re affidavits.
11/26/2019	3.00	Correspondence with process server and local counsel re affidavits of service; office conference with paralegal re same; draft amended complaint; research re default judgments; research and draft Rule 23 and 216(b) motion.
12/2/2019	2.60	Office conference re declarations, docusign and correspondence with co-counsel re same; draft Notices for rule 23 and 216(b) motion.
12/3/2019	2.50	Draft Notices, Rule 23/216(b) motion and correspondence re same; office conference re Paz status and amended complaint, and review Paz state court criminal case record.
12/4/2019	2.00	Review declarations; draft class and collective action motion; research re deadlines, local rules and meet and confer requirements.
12/5/2019	2.50	Finalize declarations; correspondence with defendants re motion for class and collective certification; revise SLF declaration and motion for class certification; communication to co-counsel regarding declarations and signature pages; discuss with KD and CJH regarding mailing notices.

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Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
12/6/2019	4.20	Finalize Amended Complaint and correspondence with local counsel, co-counsel re filing for Monday; review local rules re class action motions, deadlines; correspondence with Cotton counsel re joint scheduling report; phone conference with co-counsel re declarations; revise class certification motion and Notice, correspondence re same.
12/9/2019	2.80	Phone conference with Cotton counsel joint scheduling order; revise, finalize and file motion for class and collective action certification and declarations; phone conference with local counsel re filing procedures.
12/10/2019	1.80	Review Paz records and prepare documents for service, correspondence re same; research re motion to extend time to serve defendant; correspondence with process server re Paz new address.
12/11/2019	0.20	Correspondence with process server re Daniel Paz service and office correspondence re same.
12/12/2019	0.20	Office conference case status and upcoming deadlines, Daniel Paz service.
12/16/2019	1.00	Correspondence with and re process server as to Daniel Paz affidavit of service, correspondence with local counsel re filing affidavit of service.
12/17/2019	0.50	Draft motion for extension of time; review scheduling orders and correspondence re upcoming deadlines.
12/18/2019	0.30	Review local rules and correspondence re motion for extension.
12/19/2019	0.50	Finalize motion for extension and correspondence with local counsel, opposing counsel re same.
12/20/2019	0.20	Draft motion for extension version where no response from Cotton.

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DATE	HRS WORKED	DESCRIPTION
12/23/2019	0.80	Voicemail for Cotton counsel re request for an extension and follow-up phone conversation re same; correspondence and phone conference with local counsel re request for extension motion.
12/30/2019	6.40	Review Cotton's opposition to certification motion and research and draft reply brief.
12/31/2019	2.00	Research and draft Reply Brief, correspondence re same.
1/2/2020	0.80	Revise Reply brief and Notice, office correspondence and correspondence with co-counsel re same.
1/6/2020	0.40	Finalize reply brief and correspondence and phone conference with local counsel re filing, notice.
1/8/2020	0.30	Review correspondence re SunCapital acquisition.
1/10/2020	1.20	Draft witness list and correspondence with co-counsel re same; office correspondence about same; review file and videos taken by plaintiffs; discuss case status and witness list with paralegal.
1/16/2020	0.40	Review, revise, and finalize Statement of Witnesses.
1/27/2020	0.70	Research re motions for continuance, correspondence re same; draft motion for continuance and declaration.
1/28/2020	1.00	Research re local rules and attorney appearances; correspondence with co-counsel, opposing counsel re upcoming class certification hearing and rescheduling.
1/29/2020	0.60	Finalize and submit for filing motion for continuance and declaration, update docket, correspondence re upcoming motion for certification hearing.
1/30/2020	0.40	Office correspondance re motion on conditional certification and notice.
2/4/2020	0.40	Correspondence with KD and EH regarding plaintiff address updates.
2/6/2020	0.40	Prepare binder for upcoming collective action hearing, outline for argument.
2/11/2020	1.20	Prepare and draft outline for 2/28 certification motion argument.
2/12/2020	0.20	Correspondence with opposing counsel re substitution of counsel notice, conference call.

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DATE	HRS WORKED	DESCRIPTION
2/14/2020	0.40	Draft and prepare outline for upcoming class certification oral argument.
2/18/2020	0.20	Correspondence with Cotton counsel re previous settlement demand.
2/19/2020	2.10	Phone conference with opposing counsel re settlement demand, early discovery; office conference with SLF and with co-counsel re next steps, discovery, settlement strategy; review whatsapp messages and voicemails from plaintiffs re case status, settlement demand; draft discovery requests.
2/20/2020	0.60	Draft discovery requests to Cotton; prepare outline for class certification oral argument.
2/21/2020	1.30	Draft outline for class certification motion hearing; correspondence re potential opt-in.
2/24/2020	0.30	Review settlement demand from Cotton and documents.
2/25/2020	1.00	Draft website update; correspondence with co-counsel re settlement demand, new plaintiffs, discovery requests; office conference with SLF, GKM re settlement strategy and Cotton's settlement offer.
2/27/2020	1.30	Correspondence re settlement counter; finalize and serve discovery requests; draft revised settlement offer.
2/28/2020	0.50	Correspondence re Paz service, amendment strategy, upcoming certification hearing.
3/5/2020	0.50	Review motion for referral to mediation; office conference re new opt-in forms.
3/9/2020	0.80	Review and revise notice of filing new plaintiffs, correspondence re same; correspondence re proposed order for mediation referral.
3/11/2020	1.90	Review Court order and draft motion for extension of pretrial deadlines, correspondence re same.

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Cotton

DATE	HRS WORKED	DESCRIPTION
3/12/2020	0.8	Review Cotton edits to joint motion for extension and correspondence re same; draft email to NDF re assignment on motion for default judgment.
3/16/2020	1.00	Conference with Cotton counsel re discovery, next steps; phone conference with court re mediation conference scheduling; office conference re trial strategy.
3/17/2020	0.80	Draft 30(b)(6) and Randle deposition notices; correspondence with Cotton re potential mediation dates.
3/18/2020	1.10	Conference with Magistrate judge's chambers regarding mediation dates, follow-up correspondence with opposing counsel re same; revise and serve deposition notices.
3/19/2020	0.50	Correspondence with SLF and KD re additional deponent and deposition notices.
3/19/2020	0.50	Finalize and serve deposition notices; review Cotton's discovery requests.
3/20/2020	1.20	Review settlement counteroffers and damages calculations; office conference re response to settlement counter and strategy; review email to plaintiff re work location.
3/23/2020	0.60	Correspondence re new plaintiff work location, contact information; correspondence with Cotton re new plaintiffs; office correspondence re settlement.
3/24/2020	2.20	Review damages calculations and revise for new plaintiffs; office conference with SLF re settlement strategy; office correspondence about same; conference with Resilience Force team re settlement strategy; review and revise motion for entry of default.
3/30/2020	2.20	Conference with co-counsel and follow-up office conference with SLF re settlement strategy and settlement team; review Farmers settlement for potential claims-made settlement process; conference with Kathleen re settlement team contact and conference call.

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Cotton

DATE	HRS WORKED	DESCRIPTION
3/31/2020	0.80	Office conference re settlement strategy; review Spanish translation of communication to settlement team re conference call; office correspondence re plaintiff calls.
4/1/2020	0.40	Office correspondence regarding settlement and contacting plaintiffs.
4/2/2020	0.40	Office correspondence regarding preparation for meeting.
4/3/2020	1.90	Draft outline for Sunday call with settlement team; conference with co-counsel re strategy for settlement call with plaintiffs, settlement strategy.
4/5/2020	1.20	Zoom conference with settlement team re case status, settlement recommendations.
4/6/2020	3.50	Create and revise damages chart with Spanish translations to circulate to plaintiffs, correspondence re translation for chart and Hilton plaintiffs; correspondence re fee issues; phone conference with SLF re attorneys' fee issues and damages chart.
4/7/2020	0.10	Correspondence re damages chart, settlement negotiations.
4/8/2020	1.10	Revise damages chart to include promised wage column, correspondence re calls with Plaintiffs re settlement; review and revise outline for call with settlement team members re proposed distribution, fee issues.
4/9/2020	1.20	Revise outline for calls with Hilton plaintiffs on settlement team, correspondence re same; phone conference with Hilton plaintiff re settlement.
4/10/2020	0.40	Phone conference with Hilton plaintiff re proposed settlement, review correspondence re problem areas and settlement strategy.
4/14/2020	0.70	Team conference call re settlement strategy, conference with SLF and Kathleen re settlement and plaintiff correspondence.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Sarah Block**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
4/15/2020	0.90	Review and revise translation for status update text messages; draft settlement notification letter to plaintiffs.
4/20/2020	0.30	Correspondence re settlement, scheduling calls with plaintiffs
4/21/2020	0.80	Update outline for plaintiff calls; phone conference with Hyatt plaintiffs re settlement proposals
4/23/2020	0.50	Phone conference with Hyatt plaintiff re potential settlement
4/27/2020	2.00	Correspondence with SLF and KD re settlement status and upcoming deadlines; draft notice of settlement; revise and sent letter to Plaintiff for review; research re Martinez FLSA approvals and fairness hearings
4/28/2020	0.70	Revise damages chart and correspondence re same; review email to Cotton re settlement, edits to notice of settlement
4/30/2020	2.20	Finalize notice of settlement and email local counsel for filing; phone conference with plaintiff re settlement; review orders from court on notice of settlement; review and edit translated letter to plaintiffs; draft settlement agreement
5/1/2020	1.70	Draft settlement agreement and exhibit to settlement with damages chart
5/4/2020	0.30	Office conference re settlement to-do list, review distribution attachment and correspondence re same
5/5/2020	0.60	Review and revise settlement agreement draft; draft stipulation of dismissal
5/6/2020	0.90	Correspondence and phone conference re plaintiff question on settlement, review chart of plaintiff questions; review co-counsel comments to settlement agreement, correspondence re same
5/7/2020	1.80	Phone conference with paralegal re plaintiff responses to settlement notification; research re 1099 tax forms; revise settlement agreement
5/8/2020	4.60	Conference with plaintiff re settlement and follow-up correspondence re same; research and draft motion for default judgment, motion for settlement approval
5/11/2020	1.40	Review call outline and conference in preparation for plaintiff call; call to plaintiff re settlement distribution questions and follow-up email re same; finalize draft settlement agreement; draft plaintiff template declarations

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Sarah Block**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
5/12/2020	1.00	Conference re upcoming deadlines, default judgment motion and declarations; correspondence re plaintiff questions
5/14/2020	1.40	Research and draft Motion for Settlement Approval; review Cotton revised settlement agreement draft
5/15/2020	1.20	Review Cotton's edits to settlement agreement, revise agreement and conference re settlement agreement strategy
5/18/2020	0.30	Review and revise settlement agreement draft
5/21/2020	0.30	Discuss settlement issue with SLF
5/22/2020	0.20	Review draft settlement and office correspondence re same
5/27/2020	0.30	Correspondence with opposing counsel and SLF regarding settlement

McGILLIVARY STEELE ELKIN LLP

SERVICES PERFORMED BY

Hillary LeBeau

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
10/4/2019	0.60	Revise statement of claim.
10/7/2019	0.80	Review case file; Correspondence re: statement of claim.
10/8/2019	0.40	Revise statement of claim; office correspondence about claim.
10/11/2019	0.40	Conference with co-counsel re: defendant outreach.
10/15/2019	0.60	Draft settlement demand.
10/29/2019	0.30	Emails re: settlement demand.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
RYAN COWDIN**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
9/3/2019	0.20	Discuss Cotton case with Sara; begin to research claims related to bad checks.
9/3/2019	2.50	Review case docket; research case law related to bad check statute; start draft of potential bad check claims memo.
9/4/2019	1.80	Draft memo regarding potential bad check claim.
9/4/2019	3.30	Draft memo regarding potential bad check claim; research alternative claims and defenses related to methods of payment.
9/4/2019	3.20	Research bad check claim; draft memo regarding potential bad check claim.
9/5/2019	1.70	Finish bad check claim memo; start research on alternative common law and statutory claims in Florida related to non-payment of wages.
9/5/2019	0.80	Continue research on alternative common law and statutory claims in Florida related to non-payment of wages.
9/5/2019	1.90	Finish research on alternative claims; draft and finalize portion of bad check memo draft related to alternative claims; submit and update case file with same.
9/5/2019	0.70	Follow up research on statute of limitations and standards for bad check claim.
9/12/2019	0.20	Discuss service issues related to bad check and Florida FLSA claims.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Keith Nickerson**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
9/27/2019	0.90	Review information from Block to begin preparing damages calculations.
9/30/2019	1.40	Review information, complaint and Notice of Wage Claims; discuss with Dacruz; prepare damages calculations.
10/1/2019	1.30	Review information and prepare damages calculations; discuss with Block and Dacruz.
10/2/2019	0.70	Review damages information and modify methodology and exhibits.
10/3/2019	3.10	Review data and prepare damages calculations and memo describing analysis; discuss with Dacruz.
10/4/2019	1.70	Review damages and prepare response to Block summarizing damages.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Sandy Patel**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
8/20/2019	1.40	Emails re consent forms and website; research on same.
8/21/2019	1.30	Finalize web form for Spanish and English consent form; embed form onto website; draft and finalize website page language; office emails about same.
8/22/2019	0.40	Review consent forms sent via DocuSign.
8/26/2019	0.50	Review consent and retainer forms from DocuSign; emails with K. Dacruz on same.
8/29/2019	0.30	Review consent and retainer forms via DocuSign; emails to S. Block and K. Dacruz on same.
9/5/2019	0.70	Review consent and retainer forms via DocuSign; forward to K. DaCruz and S. Block.
9/6/2019	0.20	Review consent and retainer form.
10/1/2019	0.50	Review consent and retainer forms and update database.
10/3/2019	0.30	Review consent forms from DocuSign link.
10/7/2019	0.50	Review consent forms sent via DocuSign.
10/15/2019	0.30	Review consent form via DocuSign.
10/18/2019	0.30	Review consent and retainer form via DocuSign.
10/21/2019	0.30	Review consent and retainer form via DocuSign.
12/2/2019	0.20	Review DocuSign functions with KD
12/4/2019	0.50	Review electronic consent and retainer forms via DocuSign.
2/24/2020	0.20	Discussion with KD re docuSign link generation
3/24/2020	0.20	Correspondence with Moises Servodio regarding his work location.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Kathleen Dacruz**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
8/15/2019	1.70	Meet with SMB; review/edit and translate Spanish consent form.
8/16/2019	0.30	Review final edits to Spanish Consent Retainer.
8/20/2019	0.20	Correspondence regarding case claims with SDP.
8/21/2019	0.50	Create Spanish language version of Cotton notice to potential plaintiffs.
8/21/2019	0.30	Review Spanish language version of notice with SMB.
8/21/2019	0.50	Finalize and send Spanish language version of notice to SDP.
8/23/2019	0.30	Meet with SMB to discuss consent forms and plaintiff information.
8/23/2019	0.50	Review consent forms.
8/23/2019	0.40	Review Kerry O'Brien's worker/notes spreadsheet.
8/26/2019	0.30	Review consent retainers; make notations in group spreadsheet.
8/26/2019	0.30	Discuss consent retainer process with SMB.
8/29/2019	0.40	Review consent forms for accuracy.
9/3/2019	0.20	Meet with SMB regarding calls to Quintero and Farfan.
9/3/2019	0.60	Draft call sheet in Spanish for calls with Spanish speaking plaintiffs.
9/3/2019	0.10	Call Reinaldo Quintero
9/3/2019	0.30	Review Cotton Memo.
9/4/2019	0.30	Revise Spanish call sheet to include additional questions raised by legal team.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Kathleen Dacruz**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
9/4/2019	0.40	Discuss with SMB the upcoming call assignment to the Spanish Speakers.
9/5/2019	0.30	Revise Spanish call template to accommodate new question lists.
9/5/2019	0.20	Discuss plaintiff call logistics with SMB.
9/5/2019	1.00	Call plaintiffs regarding upcoming case filing
9/6/2019	0.50	Review plaintiff call log; update same.
9/6/2019	0.60	Prepare and review exhibit for filing.
9/6/2019	0.50	Review consent forms and plaintiff documents.
9/6/2019	0.40	Discuss case status with SMB
9/6/2019	1.10	Call plaintiffs regarding disclosure of name in case.
9/9/2019	0.30	Discuss case filing status and related updates.
9/10/2019	0.20	Review DocuSign for any additional consent forms.
9/11/2019	0.20	Email correspondence with SMB re Cotton calls.
9/12/2019	0.90	Discuss mailing issue with SMB and RCC; debrief GKM with SMB regarding Notice mailing issue.
9/17/2019	0.20	Discuss Process Server approach with SMB.
9/19/2019	0.30	Research docket entries.
9/20/2019	0.20	Discuss current situation of court summons with SMB.
9/23/2019	0.40	Discuss summons issue with SMB.
9/23/2019	0.70	Review docket; call Southern District of Florida Court Clerk; relay information learned to the legal team.
9/24/2019	0.20	Discuss recent filing of notices with SMB.
9/24/2019	0.20	Review correspondence with legal team regarding case standing.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Kathleen Dacruz**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
9/25/2019	0.20	Discuss plan of action to draft rep letters with SMB.
9/25/2019	0.40	Discuss latest docket entries with SMB.
9/26/2019	0.10	Call with John Bashaw regarding Affidavit strategy.
9/27/2019	0.20	Review and format Spanish version of Rep letter.
9/30/2019	0.50	Meet with KAN to create liquidated damages calculations.
10/1/2019	0.50	Review and edit Spanish rep letter with SMB.
10/1/2019	0.30	Meet with KAN and SMB regarding damage calculations.
10/3/2019	0.40	Review rep letter in Spanish.
10/3/2019	1.40	Meet with KAN regarding Cotton calculations.
10/4/2019	0.40	Draft call sheet in Spanish for phone interview with potential plaintiff.
10/4/2019	1.30	Review Spanish translation of rep letter; prepare database and letters for mailing.
10/4/2019	0.20	Meet with KAN to assess and update damage calculations.
10/4/2019	0.20	Correspondence with legal team regarding consent form status.
10/8/2019	0.20	Update the legal team on the consent form status.
10/9/2019	0.40	Phone call with John Bashaw from ADI regarding service attempts, and discuss with HDL and SMB.
10/10/2019	0.30	Correspondence with SMB regarding plaintiff calls; call Kendry Cruz.
10/11/2019	0.30	Call David Romero; review question set developed by SMB.
10/15/2019	0.20	Intake new consent retainer; inform legal team.
10/15/2019	0.20	Phone call with Vanessa M. Cruz regarding time at Cotton; translate and type notes.
10/15/2019	0.40	Phone call with Kendry J. Cruz regarding time at Cotton; translate and type notes.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Kathleen Dacruz**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
10/15/2019	0.60	Phone call with Jose Moyedo regarding time at Cotton; translate and type notes.
10/15/2019	0.70	Phone call with Jennis Morales regarding time at Cotton; translate and type notes.
10/16/2019	0.60	Create chart with yesterday's phone interview notes.
10/16/2019	0.30	Call yesterday's interviewees to request further clarification.
10/16/2019	0.60	Input new consent form information in plaintiff database.
10/21/2019	0.50	Process newly received consent form; correspondence with legal team.
10/28/2019	0.70	Correspondence with legal team regarding meeting; gather materials for meeting; review settlement letter.
10/29/2019	0.30	Meeting with SMB and SLF regarding current case status and next steps.
10/29/2019	0.10	Correspondence with John from ADI regarding service status.
10/29/2019	0.50	Draft call sheet in Spanish for tomorrow's calls to plaintiffs.
10/30/2019	0.50	Edit Spanish call sheet at request of attorney.
10/30/2019	0.10	Correspondence with Reinaldo Quintero Sr. regarding address and Daniel Paz info.
10/30/2019	0.10	Call Samira Omar regarding consent retainer.
10/30/2019	0.30	Discuss next steps for Cotton with SMB.
10/31/2019	0.20	Review and accept scheduling invites from CJH.
11/4/2019	0.60	Discuss Cotton plaintiff calls with SMB and SLF and case strategy.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Kathleen Dacruz**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
11/4/2019	0.10	Call John from ADI regarding service update.
11/4/2019	0.40	Call Samira Omar regarding time with Cotton Commerical; type up notes on call.
11/4/2019	0.50	Review notes from latest round of calls to newly signed up plaintiffs.
11/4/2019	0.30	Research whereabouts of Daniel Paz and Adiurka Vegacardoso with SMB; send correspondence to process server regarding info.
10/30/2019	0.10	Correspondence with Reinaldo Quintero Sr. regarding
11/4/2019	0.70	Draft text message to Reinaldo Quintero Jr.; interview him regarding his work via Whatsapp.
11/4/2019	0.50	Phone conference with SLF, SMB, and KB regarding status of case and next steps.
11/4/2019	0.20	Correspondence with legal team regarding new plaintiff names.
11/4/2019	0.40	Update Cotton database with job locations.
11/4/2019	0.30	Correspondence with Jose Moyeda via Whatsapp regarding work location.
11/4/2019	0.20	Discuss Whatsapp conversation had with Quintero Jr. with SMB.
11/4/2019	0.20	Phone call with SMB and John from ADI regarding address updates.
11/5/2019	0.40	Discuss with SMB the response received from Reinaldo Quintero Jr..
11/5/2019	0.70	Interview Reinaldo Quintero Jr. via Whatsapp.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Kathleen Dacruz**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
11/5/2019	0.30	Discuss process server status with SMB and next steps for Amended Complaint.
11/6/2019	0.50	Correspondence with Kendry Cruz regarding time at Cotton via Whatsapp.
11/6/2019	0.40	Correspondence with John from ADI (process server).
11/6/2019	0.80	Discuss interview notes and service status with SMB.
11/6/2019	0.50	Review SMB's draft of Notice of Claims.
11/12/2019	0.50	Review plaintiff call notes; create an analysis of potential candidates for Declaration and class reps.
11/13/2019	0.30	Correspondence with SMB regarding best candidates for class rep.
11/13/2019	0.30	Update plaintiff list according to County information.
11/14/2019	0.40	Correspondence with legal team regarding Cotton service.
11/15/2019	0.50	Phone call with process server; discuss with SMB.
11/18/2019	0.50	Phone conference with legal team regarding acquiring plaintiff declarations.
11/18/2019	0.30	Correspondence with legal team; review A. Vegacardoso's divorce default judgment.
11/18/2019	0.60	Correspondence with process server for update on AV's summons.
11/18/2019	0.20	Review DocuSign list with SDP; discuss results with SLF.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Kathleen Dacruz**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
11/19/2019	0.30	Correspondence with legal team regarding process server's production of Affidavits.
11/19/2019	0.40	Correspondence with the process server regarding service status.
11/19/2019	0.60	Research Florida Corrections records for defendant, Daniel Paz; correspondence with legal team regarding findings.
11/20/2019	0.30	Correspondence with process server regarding affidavits of service.
11/20/2019	0.30	Meeting with SMB regarding process server status; Daniel Paz locations findings and next steps.
11/20/2019	0.70	Correspondence with legal team over sending new notices.
11/20/2019	0.50	Discuss with SMB DocuSign logistics along with next steps for obtaining Daniel Paz location.
11/20/2019	0.20	Correspondence with Supervisory Officer of Daniel Paz.
11/22/2019	0.80	Correspondence with SMB the next steps for process server.
11/22/2019	0.40	Correspondence with process server regarding affidavit of service for Adirka V
11/25/2019	0.30	Discuss status of process server with SMB; joint call with process server.
11/26/2019	0.50	Discuss process server communication issues with SMB.
12/2/2019	0.30	Discuss Declaration Signature issue with SMB and SLF; review DocuSign functions with SDP.
12/2/2019	0.30	Review correspondence with legal team regarding declaration signatures.
12/2/2019	0.10	Discuss plan of action for contacting Daniel Paz's probation officer with SMB.
12/3/2019	0.30	Phone call with Daniel Paz's probation officer; discuss findings with SMB.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Kathleen Dacruz**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
12/3/2019	0.40	Discuss latest Monroe County Court findings about Daniel Paz whereabouts with SMB.
12/3/2019	0.20	Review correspondence amongst legal team.
12/5/2019	0.30	Process declaration signature pages; review correspondence with legal team.
12/5/2019	0.50	Discuss with CJH and SMB the mailing logistics to send out the notices of motion.
12/5/2019	0.50	Meet with SMB and discuss current status of declarations; call Kerry O'Brien with SMB for an update.
12/5/2019	0.30	Prepare and redact consent forms.
12/6/2019	0.30	Call with SLF and AD; take notes.
12/6/2019	0.30	Discuss call SLF/AD call with SMB.
12/6/2019	0.30	Review correspondence from legal team; correspondence with SMB regarding next steps.
12/6/2019	0.30	Correspondence with Bellaliz Gonzalez via Whatsapp regarding declaration signature.
12/6/2019	0.30	Phone call with SMB and KB regarding next steps to get declaration signatures.
12/6/2019	0.30	Conference with SMB regarding Bellaliz Gonzalez; call KB to explain.
12/9/2019	0.50	Discuss filing process as well as logistics for TOA and TOC with SMB.
12/9/2019	2.00	Draft TOA and TOC for brief to be filed today.
12/10/2019	0.30	Correspondence with SMB regarding Daniel Paz's current location and his new supervisory officer.
12/10/2019	0.60	Call Paz's new supervisory officer; report findings to SMB.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Kathleen Dacruz**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
12/10/2019	0.20	Meet with SMB to draft email to process server with instructions.
12/11/2019	0.10	Discuss strategy for process server with SMB.
12/12/2019	0.20	Discuss with SMB success of serving Daniel Paz; discuss next steps and court deadlines.
12/13/2019	0.40	Correspondence with SMB and process server.
12/16/2019	0.20	Review correspondence regarding process servers and the affidavit filing.
12/23/2019	0.30	Discuss filing of brief with SLF.
1/2/2020	0.30	Review and download additional docket entries.
1/10/2020	0.30	Discuss current case status and witness list with SMB.
2/3/2020	0.30	Correspondence with EH and CJH regarding plaintiff information.
2/4/2020	0.30	Correspondence with SMB and EH regarding Quintero update.
2/4/2020	0.10	Update SMB on plaintiff status.
2/7/2020	0.40	Correspondence with EH regarding plaintiff phone numbers and Whatsapp; send password protected copy.
2/7/2020	0.10	Correspondence with SMB regarding plaintiff personal information.
2/24/2020	0.20	Troubleshoot docusign link generation with SDP.
2/24/2020	0.10	Correspondence with SMB regarding plaintiff reminders for Wednesday mediation.
2/26/2020	0.20	Process new consent form; correspondence with legal team regarding next steps.
3/5/2020	0.50	Correspondence with legal team regarding potential plaintiff consent forms and attorney-client privilege.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Kathleen Dacruz**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
3/9/2020	0.70	Draft Consent to Become Party Plaintiff Form; prepare and redact consent forms; send to SMB for review.
3/19/2020	0.50	Correspondence with SLF and SMB re deposition notices.
3/20/2020	0.30	Draft Spanish call sheet for conversations with newly filed plaintiffs.
3/20/2020	0.50	Correspondence with new plaintiffs regarding their locations.
3/20/2020	0.20	Brief SMB with the status of plaintiffs interviews and phone numbers.
3/20/2020	0.50	Draft email in Spanish for plaintiff; send to SMB for review; send to plaintiff.
3/23/2020	0.40	Communication via Whatsapp with plaintiff Servodio regarding work location; update SMB.
3/24/2020	0.20	Update SMB regarding plaintiff communication status.
3/30/2020	0.30	Call with SMB and SLF regarding plaintiff call project.
3/31/2020	0.80	Translate call sheet outline into Spanish; send to SMB for review; office correspondence regarding database.
3/31/2020	1.20	Correspondence with plaintiffs regarding their role as plaintiff reps.
3/31/2020	0.20	Update SMB on plaintiff contact status.
4/1/2020	1.30	Review legal team correspondence; correspondence with SMB and SLF regarding next steps for plaintiff rep contact; correspondence with Yormar Farfan
4/2/2020	0.90	Communication with Yorman Farfan regarding plaintiff rep participation; review legal team correspondence regarding Sunday's call

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Kathleen Dacruz**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
4/3/2020	0.70	Draft Spanish communications; correspondence with Yorman Farfan regarding plaintiff rep participation
4/3/2020	0.50	Correspondence amongst legal team regarding upcoming status call; status call with the Justice Force Project team
4/6/2020	0.60	Correspondence amongst legal team regarding plaintiff rep team concerns; translate messages sent by Kassandra Cruz
4/6/2020	0.50	Correspondence with legal team regarding damage calculation translation; translate into Spanish; send to SMB for review
4/6/2020	0.60	Correspondence with SMB regarding contact with Yormar Farfan; draft call sheet; message Yormar via Whatsapp
4/7/2020	0.50	Review damage calculations chart and correspondence amongst legal team
4/8/2020	1.00	Draft English/Spanish call script for tomorrow's calls; send draft to SMB for review
4/8/2020	3.20	Correspondence with legal team regarding damage calculations and plaintiff concerns; draft Spanish call sheet; contact rep plaintiffs regarding damage calculation call
4/9/2020	0.60	Receive and process messages/photos sent by Bellaliz and Kassandra, compile and send to SLF and SMB
4/9/2020	1.00	Correspondence with SMB regarding call script for Yormar and Noiralith; make edits; call Yormar Farfan with SMB
4/9/2020	3.00	Correspondence with SLF and SMB regarding call script; make edits; call with Kassandra Cruz and SLF; call with Bellaliz and SLF
4/10/2020	0.80	Discuss call script with SMB; call Noiralith; send recap of call to legal team; discuss with SLF and SMB.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Kathleen Dacruz**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
4/13/2020	0.40	Correspondence with the legal team regarding Bellaliz; respond to Bellaliz
4/14/2020	0.70	Phone conference with legal team regarding settlement strategy; email correspondence regarding plaintiff responses
4/15/2020	1.00	Correspondence with legal team regarding draft responses to plaintiffs; correspondence with Bellaliz and Kassandra via Whatsapp
4/20/2020	0.50	Add new plaintiffs to database; draft call sheet in Spanish, reach out to Key West plaintiffs via Whatsapp
4/20/2020	0.40	Correspondence with SLF and SMB regarding negotiations status and plaintiff calls.
4/21/2020	2.00	Correspondence with SMB regarding plaintiff call scheduling; review Spanish call sheet; call with Jennis Morales, attempt call with Erick Villasana
4/22/2020	0.20	Correspondence with Erick Villasana
4/23/2020	0.80	Call with Erick Villasana; discuss with SMB; update team
4/27/2020	0.50	Correspondence with SLF and SMB regarding case status
4/28/2020	0.60	Correspondence with SLF and SMB regarding case status; message Bellaliz Gonzalez via Whatsapp
4/30/2020	0.80	Correspondence with team regarding Kassandra Cruz future call; correspondence with Kassandra Cruz regarding scheduling a phone call; call with Kassandra and SMB
4/30/2020	0.70	Translate SLF's status update in preparation for call with Bellaliz Gonzalez; call with Bellaliz; correspondence with team regarding Kassandra Cruz future call
5/7/2020	0.60	Phone conference with SMB re plaintiff responses to settlement.

McGILLIVARY STEELE ELKIN LLP

**SERVICES PERFORMED BY
Charisma Hunter**

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
10/31/2019	0.50	Prepare calendar events for deadlines.
11/7/2019	0.30	Prepare plaintiff document for mailing.
11/20/2019	0.60	Prepare plaintiff documents for mailing.
12/5/2019	1.50	Office discussion with SMB and KD regarding mailing of notices of motion; prepare mailing.
12/19/2019	0.10	Phone Correspondence regarding the status of the case.
1/16/2020	0.90	Prepare a mailing to defendants.
2/3/2020	0.30	Correspondence with KD and EH re plaintiff information.
2/26/2020	0.20	Office correspondence re additional consent form.
2/26/2020	1.20	Prepare materials for SLF Argument.

McGILLIVARY STEELE ELKIN LLP

SERVICES PERFORMED BY

Mary O'Brien

Report Period: 07/19/2019 to 05/27/2020

Miscellaneous
Cotton

DATE	HRS WORKED	DESCRIPTION
9/24/2019	1.00	Draft pro hac vice applications for attorneys; office correspondence re same.

Exhibit B

Date	Item	Hours	Hours	Case	Who
Mar 8, 2019	call with cotton workers	0:28	0.4	Cotton	Kerry O'Brien
May 16, 2019	call about Cotton	:30	0.5	Cotton	Kerry O'Brien
May 28, 2019	outreach about Cotton	:06	0.1	Cotton	Kerry O'Brien
Jun 20, 2019	Cotton case placement	:06	0.1	Cotton	Kerry O'Brien
Jul 22, 2019	call with Greg McGillivray and team about Cotton litigation	:45	0.7	Cotton	Kerry O'Brien
Aug 5, 2019	review Cotton McGillivray co counsel agreement, review consent, send question, send question to Chris Williams about co counsel agreement	:12	0.2	Cotton	Kerry O'Brien
Aug 12, 2019	prep for and check in call with intern Angelica Afandaor, give assignment to prepare for outreach to Cotton workers	:12	0.2	Cotton	Kerry O'Brien
Aug 14, 2019	review contact list, add intern Angelica Afanador to Whatsapp group, compose and send email to Angelica with instructions for outreach, compose and send email to Daniel Castellanos, Gabriel Thompson, Javiera Alarcon and Cynthia Hernandez to please add all contact information they have to the spreadsheet, review translation of consent form, send to McGillivray attorneys	1:12	1.2	Cotton	Kerry O'Brien
Aug 19, 2019	send retainer agreement in Spanish to Angelica for distribution, request Angelica to communicate with Reynaldo	:12	0.2	Cotton	Kerry O'Brien
Aug 19, 2019	Turn Spanish retainer into PDF send to Reynaldo, Daniel and Angelica	:18	0.3	Cotton	Kerry O'Brien
Aug 21, 2019	correspondence with Bellaliz re signing Cotton retainer agreement, modify tracking spreadsheet and update with Bellaliz information	:18	0.3	Cotton	Kerry O'Brien
Aug 21, 2019	Cotton: review docusign and send to Reynaldo and bellaliz on whatsapp, respond to Greg McGillivray and review email chain	:30	0.5	Cotton	Kerry O'Brien
Aug 22, 2019	review all Cotton documents, update spreadsheet, call with Daniel Castellanos, call with Reynaldo Quintero, texts with Daniel, texts with Reynaldo about bank site and other sites, and his working site.	2:12	2.2	Cotton	Kerry O'Brien
Aug 22, 2019	review Whatsapp message from Kassandra Kruz, review DocSign consent form, query about worksite	:06	0.1	Cotton	Kerry O'Brien
Aug 23, 2019	Review Reynaldo Quintero signed agreement and respond to message	:06	0.1	Cotton	Kerry O'Brien
Aug 23, 2019	WhatsApp messages with Valeria Omar about questions and trying to arrange a time to talk	:12	0.2	Cotton	Kerry O'Brien
Aug 23, 2019	review Cotton worker tracking spreadsheet, review WhatsApp messages from workers, update spreadsheet, check in with Angelica, compose email for translation	:48	0.8	Cotton	Kerry O'Brien
Aug 24, 2019	send message to Angelica about availability tomorrow, create priority order for workers, send message to Angelica about getting in touch with Valeria Omar who has questions and other workers	:18	0.3	Cotton	Kerry O'Brien
Aug 25, 2019	work with Angelica to phone workers, discussed what to say, reached Pedro Cabre and Yorman Farfan	1:00	1	Cotton	Kerry O'Brien
Aug 26, 2019	compose and send email to McGillivray team about next steps, research Florida bad check statute and notice requirements.	:24	0.4	Cotton	Kerry O'Brien
Aug 26, 2019	check in with Angelica Afanador about Cotton case, calls review contacts from Sunday and Monday morning, make calls to two workers, left messages	:48	0.8	Cotton	Kerry O'Brien
Aug 28, 2019	prepare portion of statement of facts, review screenshots, request source of screenshot from Gabriel	1:06	1.1	Cotton	Kerry O'Brien
Aug 29, 2019	review Cotton worker spreadsheet, onboard Antonia for Cotton projects, revise spreadsheet, send text message to Cynthia about outreach, verify two phone numbers by looking at Whatsapp group	:54	0.9	Cotton	Kerry O'Brien
Aug 30, 2019	review and respond to text message from Kassandra Cruz confirming all was OK with her consent form	:06	0.1	Cotton	Kerry O'Brien
Aug 30, 2019	call with Sara Falumman at McGillivray about complaint, timing, bad check claims	:12	0.2	Cotton	Kerry O'Brien
Sep 4, 2019	Review and send information about Hyatt WIndPointe, update complaint with Hyatt information, review and make additional edits to complaint, review Reynaldo Quintero interview, review and make notes on FI Min wage notice, transmit complaint and notice document to litigation team at MSE	2:42	2.7	Cotton	Kerry O'Brien
Sep 4, 2019	review information from Gabriel about second immigration threat, compose email to Antonia about second immigration threat, compose email to Gabriel about second immigration threat, sent Whatsapp message to Kassandra, reviewed response from Kassandra about second immigration threat	:15	0.2	Cotton	Kerry O'Brien
Sep 4, 2019	receive call from potential plaintiff, interview plaintiff, explain terms of retainer agreement, send retainer agreement link, ask for additional information	:42	0.7	Cotton	Kerry O'Brien
Sep 4, 2019	review complaint, make comments, review minimum wage notice, make comments, review bad check notice, write to litigation team and send documents	:42	0.7	Cotton	Kerry O'Brien
Sep 25, 2019	download and study local rules, prepare and send pro hac vice motion in Cotton case	:24	0.4	Cotton	Kerry O'Brien

Sep 27, 2019	review correspondence from co-counsel, review letter to clients, assign translation to Angelica Afanador, respond to correspondence from co-counsel	: 24	0.4	Cotton	Kerry O'Brien
Sep 30, 2019	review message from potential plaintiff, review and update plaintiff/potential plaintiff spreadsheet assign communication to Angelica, correspond with co-counsel Cotton: review Gabriel Thompson time and write and send email to Gabriel, review time entries compiled by Angelica, pull additional time entries from timekeeping system, update spreadsheet, send time record to MSE.	: 12	0.2	Cotton	Kerry O'Brien
Oct 2, 2019		0h 36m	0.6	Cotton	Kerry O'Brien
Oct 3, 2019	Cotton- review message from potential plaintiff, exchange messages, provide information, answer questions, send agreement check in with Angelica about Cotton projects, communicating with potential plaintiffs	0h 35m	0.5	Cotton	Kerry O'Brien
Oct 4, 2019	review and make comments on statement of claim, send email to Hillary	0h 12m	0.2	Cotton	Kerry O'Brien
Oct 7, 2019	check in with Angelica about communication with plaintiffs and potential plaintiffs	0h 12m	0.2	Cotton	Kerry O'Brien
Oct 7, 2019	question to Kathleen Dacruz about signatures, give her heads up about another signature on the way, correspond with Bellaliz about potential plaintiffs	0h 06m	0.1	Cotton	Kerry O'Brien
Oct 8, 2019	correspond with potential plaintiff about case	0h 06m	0.1	Cotton	Kerry O'Brien
Oct 8, 2019	respond to inquiry from Bellaliz about the case	0h 06m	0.1	Cotton	Kerry O'Brien
Oct 8, 2019	review correspondence from Hillary at MSE regarding statement of claim and amending complaint, respond to email, review response	0h 12m	0.2	Cotton	Kerry O'Brien
Oct 9, 2019	check in call with Angelica about Cotton case	0h 06m	0.1	Cotton	Kerry O'Brien
Oct 11, 2019	communicate with potential plaintiff (Vanessa Cruz) on whatsapp, responding to her message	0h 06m	0.1	Cotton	Kerry O'Brien
Oct 15, 2019	review emails from Kathleen Dacruz regarding new signed agreements, communicate with two who signed agreements to inform them of next steps, email to MSE re: next steps	0h 12m	0.2	Cotton	Kerry O'Brien
Nov 1, 2019	call with Angelica to explain follow up with workers needed	0h 12m	0.2	Cotton	Kerry O'Brien
Nov 4, 2019	Cotton check in with co-counsel about amended complaint, service, motions for class and collective action	0h 30m	0.5	Cotton	Kerry O'Brien
Nov 7, 2019	Cotton call with coworker Daniel Castellanos about providing update to workers, asking two plaintiffs to call co-counsel, requesting information from workers about possible addresses for Daniel Paz and company co-owner, confirming email to Daniel	0h 24m	0.4	Cotton	Kerry O'Brien
Nov 7, 2019	Research SSPS registered agent address with FL licensing, Instagram, Facebook business page, transmit information to co-counsel	0h 24m	0.4	Cotton	Kerry O'Brien
Nov 18, 2019	call with MSE plus Angelica regarding affidavits from plaintiffs, research into court cases involving Daniel Paz and Adirka Vega in the Tampa area for purposes of assisting with service of process, email to MSE with results	0h 48m	0.8	Cotton	Kerry O'Brien
Nov 19, 2019	review filing from court, download Cotton answer and review	0h 18m	0.3	Cotton	Kerry O'Brien
Nov 19, 2019	Cotton demand letter - review, edit, revise, transmit to co-counsel prep for, call with and follow up after Angelica re collecting affidavits from Cotton plaintiffs	0h 18m	0.3	Cotton	Kerry O'Brien
Nov 20, 2019	Cotton, review email from MSE re affidavits, response about docusign	0h 06m	0.1	Cotton	Kerry O'Brien
Nov 20, 2019	review Cotton answer, compare answer and complaint	0h 18m	0.3	Cotton	Kerry O'Brien
Nov 22, 2019	Cotton check in with Angelica about affidavits, review spreadsheet, review 2nd WhatsApp Group	0h 12m	0.2	Cotton	Kerry O'Brien
Nov 26, 2019	Cotton, review email from Sarah Block, review amended complaint, respond to Sarah Block	0h 30m	0.5	Cotton	Kerry O'Brien
Nov 27, 2019	compose and send email to MSE lawyers summarizing findings on Daniel Paz	0h 06m	0.1	Cotton	Kerry O'Brien
Dec 2, 2019	Cotton, review email from MSE and respond, reach out to Daniel Castellanos and ask for his help with the declarations	0h 12m	0.2	Cotton	Kerry O'Brien
Dec 2, 2019	Cotton check in with Angelica about declarations	0h 12m	0.2	Cotton	Kerry O'Brien
Dec 2, 2019	Cotton: review first amended complaint, provide comments, and send to MSE	0h 54m	0.9	Cotton	Kerry O'Brien
Dec 4, 2019	Cotton: review declarations	0h 06m	0.1	Cotton	Kerry O'Brien
Dec 4, 2019	Cotton, check in with Angelica, discussion of finalized declarations and declarations still outstanding, download and send finalized declarations to MSE	0h 12m	0.2	Cotton	Kerry O'Brien
Dec 9, 2019	review joint scheduling report	0h 06m	0.1	Cotton	Kerry O'Brien
Dec 9, 2019	review class complaint, edit section about my experience	0h 12m	0.2	Cotton	Kerry O'Brien
Dec 9, 2019	check in with Angelica about declarations, forward declaration of Cassandra Cruz, review and forward declaration of Reinaldo Quintero Sr.,	0h 18m	0.3	Cotton	Kerry O'Brien
Dec 16, 2019	review document related to service of process and describe situation to Daniel who will provide update to plaintiffs	0h 18m	0.3	Cotton	Kerry O'Brien

Dec 31, 2019	review order granting extension of time, review Cotton answer, review Cotton opposition	0h 18m	0.3	Cotton	Kerry O'Brien
Jan 6, 2020	review response to class opposition	0h 12m	0.2	Cotton	Kerry O'Brien
Jan 13, 2020	Cotton - review witness list for missing information and attempt to locate missing information, assign to Emily Hernandez reaching out to the workers, add Emily to communications mechanisms, send messages to Bellaliz, Reinaldo, Kassandra, Gustavo and Angelica Afanador	0h 30m	0.5	Cotton	Kerry O'Brien
Jan 15, 2020	review Cotton witness statement, add information gathered by Emily, pose question to workers about titles of Hector and Eddy	0h 12m	0.2	Cotton	Kerry O'Brien
Jan 15, 2020	Cotton - prepare and review return of Cotton witness list to MSE. Communicate with workers including Gustavo about title of Hector. Conduct internet research to attempt to determine title. Compose and send email to co-counsel with revised witness statement.	0h 24m	0.4	Cotton	Kerry O'Brien
Jan 30, 2020	review messages from two plaintiffs regarding letter received from MSE plus an address update	0h 06m	0.1	Cotton	Kerry O'Brien
Feb 6, 2020	draft update message to Cotton workers regarding upcoming class hearing and other updates	0h 36m	0.6	Cotton	Kerry O'Brien
Feb 7, 2020	Check in with Emily Hernandez about Cotton update and translating and sending it	0h 12m	0.2	Cotton	Kerry O'Brien
Feb 12, 2020	review message from new Jackson Lewis lawyers, correspond with co-counsel about scheduling,	0h 06m	0.1	Cotton	Kerry O'Brien
Feb 12, 2020	review responses from clients to update, ask Emily for help in translating, respond to Emily	0h 06m	0.1	Cotton	Kerry O'Brien
Feb 13, 2020	check in with Emily Hernandez about messages from Cotton workers, response, compose response in english, send to emily for translation, review previous litigation from new Jackson Lewis attorney.	0h 42m	0.7	Cotton	Kerry O'Brien
Feb 13, 2020	review questions from plaintiffs, prepare responses, ask co-counsel for copy of settlement offer sent to Cotton in November, review settlement offer document, prepare response to plaintiff questions and send to Emily for translation	1h 06m	1.1	Cotton	Kerry O'Brien
Feb 14, 2020	review email regarding Daniel communicating with Cotton workers	0h 06m	0.1	Cotton	Kerry O'Brien
Feb 17, 2020	review messages from Cotton workers, listen to Kassandra voice mail message	0h 12m	0.2	Cotton	Kerry O'Brien
Feb 18, 2020	review message from Emily re communication with Cotton workers, send email to co-counsel re settlement conversation tomorrow	0h 18m	0.3	Cotton	Kerry O'Brien
Feb 19, 2020	review email re Cotton settlement call, call Sarah Block to debrief settlement call, discuss discovery request, send email to Sarah Block, send second email to Sarah Block	0h 18m	0.3	Cotton	Kerry O'Brien
Feb 19, 2020	prep for and participate in Cotton settlement call	0h 36m	0.6	Cotton	Kerry O'Brien
Feb 20, 2020	review Emily emails, check in with Emily about Cotton, review information about threats received from Bellaliz, Kassandra, new worker information, new interviews, checking on Valeria Omar and asking Emily to respond to the group	0h 54m	0.9	Cotton	Kerry O'Brien
Feb 26, 2020	review settlement offer, respond to co-counsel	0h 18m	0.3	Cotton	Kerry O'Brien
Feb 26, 2020	Cotton review discovery request and revise, send to co-counsel, revise further and send. review documents sent by opposing counsel, analyze and send email to co-counsel about discrepancies	1h 24m	1.4	Cotton	Kerry O'Brien
Feb 27, 2020	review email from co-counsel, call with Sara Faulman about settlement	0h 12m	0.2	Cotton	Kerry O'Brien
Feb 27, 2020	check in with Emily Hernandez about Cotton case, ask her to update group that hearing is at 2 and not 3pm tomorrow, discuss recent call with potential plaintiff Valeria Omar, talk about upcoming call with Bellaliz and Kassandra	0h 24m	0.4	Cotton	Kerry O'Brien
Feb 28, 2020	review report from Cotton class certification hearing, compose message to plaintiffs, translate, send and review responses.	0h 12m	0.2	Cotton	Kerry O'Brien
Mar 2, 2020	question to co-counsel regarding Cotton recruitment of workers	0h 06m	0.1	Cotton	Kerry O'Brien
Mar 3, 2020	check in with Emily Hernandez about Cotton case, ask her to write up conversations regarding Cotton threat, discuss recruitment issue	0h 06m	0.1	Cotton	Kerry O'Brien
Mar 3, 2020	review email from Cotton co-counsel and respond, review messages to plaintiff, respond to plaintiff regarding recruiting announcement	0h 06m	0.1	Cotton	Kerry O'Brien
Mar 5, 2020	Cotton check in with Emily, review notes of worker interview write ups and return, review emails from co-counsel about new plaintiffs	0h 12m	0.2	Cotton	Kerry O'Brien
Mar 26, 2020	review and send back motion for default judgments against Paz, SSPS and VCDP	0h 06m	0.1	Cotton	Kerry O'Brien
Mar 30, 2020	call with co-counsel about negotiating team, wages owed	0h 30m	0.5	Cotton	Kerry O'Brien
Apr 1, 2020	schedule Friday call with co-counsel, include Emily	0h 06m	0.1	Cotton	Kerry O'Brien
Apr 1, 2020	review email re settlement from co-counsel	0h 06m	0.1	Cotton	Kerry O'Brien
Apr 3, 2020	check in with co-counsel about settlement negotiations, logistics for meeting on Sunday.	0h 24m	0.4	Cotton	Kerry O'Brien

Apr 4, 2020	review outline of settlement team conversation	0h 12m	0.2	Cotton	Kerry O'Brien
Apr 5, 2020	review Whatsapp messages from plaintiffs, translate messages	0h 12m	0.2	Cotton	Kerry O'Brien
Apr 5, 2020	Discussion with Bellaliz, Kassandra, co-counsel, Emily Hernandez re settlement, call with Sara Faulman to debrief, call with Emily to debrief	1h 30m	1.5	Cotton	Kerry O'Brien
Apr 6, 2020	review Whatsapp messages, translate messages, compose and email to co counsel regarding plaintiff activity and questions about fee arrangements, review proposed spreadsheet and provide comments.	0h 36m	0.6	Cotton	Kerry O'Brien
Apr 7, 2020	review revised settlement spreadsheet sent by co-counsel, respond discussion with co-counsel about settlement, recent discussions with plaintiffs	0h 12m	0.2	Cotton	Kerry O'Brien
Apr 14, 2020	discuss settlement letter with Emily Hernandez, review settlement letter in English and Spanish, respond to co-counsel, request assistance in translation with plaintiffs	0h 18m	0.3	Cotton	Kerry O'Brien
Apr 30, 2020	receive settlement agreement, send note to colleagues that note has gone out to plaintiffs about settlement	0h 18m	0.3	Cotton	Kerry O'Brien
May 5, 2020	review draft settlement agreement, make comments and return to co-counsel	0h 06m	0.1	Cotton	Kerry O'Brien
May 6, 2020	Review email re: postponed settlement hearing	0h 18m	0.3	Cotton	Kerry O'Brien
May 7, 2020	review email response re: settlement, send email re: tax issue, mark calendar with plaintiff deadline, send email with question about judge's decision on postponing settlement conference	0h 06m	0.1	Cotton	Kerry O'Brien
May 7, 2020	review settlement agreement and email from co-counsel	0h 12m	0.2	Cotton	Kerry O'Brien
May 15, 2020	review settlement agreement, review comments, make comments, return to co-counsel	0h 06m	0.1	Cotton	Kerry O'Brien
May 18, 2020	email to co-counsel regarding Gustavo's reaching out but not responding	0h 18m	0.3	Cotton	Kerry O'Brien
May 22, 2020	check in with Emily about Gustavo Hernandez, send email to co counsel about settlement agreement and next steps	0h 06m	0.1	Cotton	Kerry O'Brien
May 26, 2020	review email from co-counsel in Cotton case, review settlement agreement, respond	0h 06m	0.1	Cotton	Kerry O'Brien
Jun 2, 2020	review emails related to translation of settlement agreement, discussion with Karla about translation of settlement agreement (Cotton)	0h 12m	0.2	Cotton	Kerry O'Brien
Jun 3, 2020		0h 12m	0.2	Cotton	Kerry O'Brien
			43.8		
			x\$400		
		Total:	\$17,520		

Exhibit C

Trans...	Date	▲ Matter ID	▲ Matter Description	Initials	Comp...	Units	Price	Ext Amt	Discount
134021	9/3/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
133961	9/6/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	T	0.7500	195.0000	146.25	0.00
134024	9/6/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.5000	195.0000	97.50	0.00
134027	9/10/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
134078	9/13/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	T	1.0000	195.0000	195.00	0.00
134042	9/16/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	1.2000	195.0000	234.00	0.00
134055	9/17/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	4.0000	195.0000	780.00	0.00
134220	9/19/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
134222	9/20/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.3000	195.0000	58.50	0.00
134229	9/23/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
134242	9/24/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.8000	195.0000	156.00	0.00
134255	9/25/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	2.0000	195.0000	390.00	0.00
134286	9/26/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.5000	195.0000	97.50	0.00
134432	10/1/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.7500	195.0000	146.25	0.00
134581	10/9/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
134772	10/23/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
135034	11/7/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
134971	11/11/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
135241	11/20/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.5000	195.0000	97.50	0.00
135441	11/22/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.1000	195.0000	19.50	0.00
135442	11/22/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
135449	11/22/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.1000	195.0000	19.50	0.00
135272	11/26/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.7000	195.0000	136.50	0.00
135503	12/5/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
135410	12/6/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	1.1000	195.0000	214.50	0.00
135413	12/9/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	2.7500	195.0000	536.25	0.00
135532	12/10/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
135668	12/16/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.3000	195.0000	58.50	0.00
135729	12/19/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
135746	12/23/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.7500	195.0000	146.25	0.00
135755	12/26/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.5000	195.0000	97.50	0.00
135993	1/6/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	1.6000	195.0000	312.00	0.00
136072	1/17/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.3000	195.0000	58.50	0.00
136157	1/28/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.1000	195.0000	19.50	0.00
136182	1/29/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.7500	195.0000	146.25	0.00
136377	2/12/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2000	195.0000	39.00	0.00

Trans...	Date	▲ Matter ID	▲ Matter Description	Initials	Comp...	Units	Price	Ext Amt	Discount
136645	2/18/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2000	195.0000	39.00	0.00
136674	2/24/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.5000	195.0000	97.50	0.00
136891	3/9/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
136895	3/10/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.5000	195.0000	97.50	0.00
137206	3/19/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.5000	195.0000	97.50	0.00
137257	3/27/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	1.0000	195.0000	195.00	0.00
137312	3/30/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.1000	195.0000	19.50	0.00
137744	4/14/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.1000	195.0000	19.50	0.00
137898	4/30/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.3000	195.0000	58.50	0.00
137943	5/6/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.2500	195.0000	48.75	0.00
137954	5/7/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.1000	195.0000	19.50	0.00
138550	5/11/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	EFM	T	0.5000	195.0000	97.50	0.00

Totals:

28.85 \$ 5,625.75

Fees

Exhibit D

McGILLIVARY STEELE ELKIN LLP

Expenses Incurred

Report Period: 07/18/2019 to 05/27/2020

Miscellaneous Cotton

Federal Express	\$186.30
LexisNexis Research	\$141.50
Outside Xerox Copying	\$30.55
Phone Charges	\$123.30
Process Server	\$1,350.00
Travel Expense	\$1,302.33
Total:	<hr/> \$3,133.98

Exhibit E

Trans...	Date	▲ Matter ID	▲ Matter Description	Initials	Comp...	Units	Price	Ext Amt	Discount
134471	9/17/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	Filing Fee	1.0000	400.0000	400.00	0.00
134467	9/25/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	Filing Fee	1.0000	75.0000	75.00	0.00
134468	9/25/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	Filing Fee	1.0000	75.0000	75.00	0.00
134469	9/25/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	Filing Fee	1.0000	75.0000	75.00	0.00
134470	9/25/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	Filing Fee	1.0000	75.0000	75.00	0.00
134942	10/1/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	ppp	1.0000	5.0000	5.00	0.00
134944	10/9/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	ppp	1.0000	3.0000	3.00	0.00
134931	10/31/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	ppp	1.0000	16.5000	16.50	0.00
135879	12/1/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	ppp	1.0000	6.4800	6.48	0.00
135893	12/23/2019	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	ppp	1.0000	1.5000	1.50	0.00
136242	1/31/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	ppp	1.0000	12.6000	12.60	0.00
137725	3/10/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	ppp	1.0000	1.9500	1.95	0.00
137729	3/27/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	ppp	1.0000	1.9500	1.95	0.00
137723	3/31/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	ppp	1.0000	29.4700	29.47	0.00
138551	5/31/2020	120200.6190	Cabre, et al. v. Cotton Holdings, Inc.	MJM	ppp	1.0000	1.8000	1.80	0.00

Total:

\$780.25

Costs