UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT GREENEVILLE

RUSSELL STEVEN LAPOINTE,)		
Plaintiff,)		
v.)	Nos.	2:15-CV-171 2:15-CV-172
MIDLAND FUNDING, LLC)		
MIDLAND CREDIT MANAGEMENT, INC.,)		
)		
Defendants.)		

MEMORANDUM OPINION AND ORDER

These matters are before the Court on the plaintiff's Motions for Attorney's Fees and Costs, [Doc. 22 in No. 2:15-CV-171 and Doc. 19 in No. 2:15-CV-172]. The defendants have responded, and the plaintiff has replied. The matters are ripe for review. For the reasons that follow, the motions are GRANTED IN PART AND DENIED IN PART.

The plaintiff filed his Complaints, which raise claims under the Fair Debt collection Practices Act ("FDCPA"), on June 22, 2015. The two Complaints are virtually identical. They raise claims against the same defendants for violations of the FDCPA regarding the collection to two debts originally incurred by the plaintiff to two different creditors, i.e. Wal-Mart and JCPenney. Defendants filed their Answers on August 24, 2015. On the same day, the defendants filed a Motion to Consolidate in case number 2:15-CV-171, [Doc. 10]. Also on the same day, the defendants tendered Offers of Judgment to the plaintiff in both cases. These

¹ From this point forward, this Memorandum Opinion will only refer to the filings in case number 2:15-CV-171. The Court has thoroughly reviewed all filings in both cases. All filings, for purposes of these motions, are essentially the same and at times identical. Moreover, prior to the offers of judgment in both cases, the defendants moved to consolidate the cases. However, the offers of judgment rendered the motion moot. In addition, the defendants have asked the Court to take judicial notice of the filings in each case. The Court will do so.

Offers consented to Judgments against the defendants for \$1001.00 plus attorney's fees and costs for each case.

According to plaintiff's counsel's records, counsel began working on responses to the Motion to Consolidate the same day the defendants tendered the Offers of Judgment on August 24, 2015. Counsel's time records confirm that he waited until September 8, 2015, to inform the plaintiff of defendants' Offers of Judgment. Plaintiff accepted these offers the same day they were presented to him. Almost two hours before filing notices of accepting the Offers of Judgment, plaintiff's counsel filed responses to the Motion to Consolidate.

On September 8, 2015, the plaintiff notified the Court of his acceptance of the Offers of Judgment by filing notices with the Court. The Court entered the Judgments on September 9, 2016. Thus, the Motion to Consolidate was rendered moot. Then, on September 23, 2015, the defendants tendered to plaintiff two checks for \$1,001.00.

On October 19, 2015, plaintiff's counsel filed the instant Motions for Attorney's Fees and Costs. In case number -171, counsel seeks \$7,133.00 in attorney's fees and costs of \$470.90 in costs for a total of \$7,603.90. In case number -171, counsel seeks \$6,650.50 in attorney's fees and \$467.47 in costs for a total of \$7,117.97.

The defendants argue that the total request of \$14,721.97 for duplicative and unnecessary work on two identical lawsuits should not be honored and the award should be reduced. The defendants further argue that the cases should have been brought in one suit, that a majority of the work claimed was performed after the Offers of Judgment, and that the hourly rate is excessive.

The FDCPA provides, in material part, "any debt collector who fails to comply with any provision of this subchapter with respect to any person is liable [for] . . . the costs of the action,

together with a reasonable attorney's fee as determined by the court." 15 U.S.C. § 1692k(a)(3); see also Cotner v. Buffaloe & Assocs., PLC, 3:11-CV-299, 2012 WL 1670552, at *1 (E.D. Tenn. May 14, 2012) (Jordan, J.). A party seeking attorney's fees under a federal fee shifting statute such as the FDCPA bears the burden to show she is entitled to the amount requested. See Hensley v. Eckerhart, 461 U.S. 424, 433 (1983); Reed v. Rhodes, 179 F.3d 453, 472 (6th Cir. 1999) (citations omitted). The fees requested should be documented, and, where they are not, the district court may reduce the award accordingly. Reed, 179 F.3d at 472 (citing Hensley, 461 U.S. at 433). The award of attorney's fees is left to the district court's exercise of discretion within the appropriate parameters, which are discussed below. See Hensley, 461 U.S. at 437; Reed, 179 F.3d at 469 n.2.

Attorney's fees for successful litigants under federal fee shifting statutes are commonly calculated using the "lodestar" method of multiplying the number of hours reasonably expended by a reasonable hourly rate. Webb v. Board of Educ. of Dyer County, Tenn., 471 U.S. 234, 242 (1985); Hensley, 461 U.S. at 433; Adcock-Ladd v. Sec'y of the Treasury, 227 F.3d 343, 349 (6th Cir. 2000); Reed, 179 F.3d at 471. The reasonableness of the hours expended and the attorney's hourly rate must be considered on a case-by-case basis. Hensley, 461 U.S. at 429.

Courts may consider several factors to determine the basic lodestar fee and whether to make adjustments to it. *See Hensley*, 461 U.S. at 434 n.9; *Reed*, 179 F.3d at 471. Factors relevant to determination of the lodestar and any adjustments are: "(1) the time and labor required by a given case; (2) the novelty and difficulty of the questions presented; (3) the skill needed to perform the legal service properly; (4) the preclusion of employment by the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or the circumstances; (8) the amount involved and the

results obtained; (9) the experience, reputation, and ability of the attorneys; (10) the "undesirability" of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases." *Hensley*, 461 U.S. at 430 n.3 (quoting *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714, 717-19 (5th Cir. 1974)); *Reed*, 179 F.3d at 472 n.3 (citations omitted).

While the lodestar method is the appropriate starting place for determining attorney's fees, the inquiry does not end there. *See id.* at 472. Other considerations may lead the district court to adjust the fee. *See id.* "[T]he most critical factor' in determining the reasonableness of a fee award is 'the degree of success obtained." *Farrar v. Hobby*, 506 U.S. 103, 114 (1992) (citing *Hensley*, 461 U.S. at 436); *see also Cramblit v. Fikse*, 33 F.3d 633, 635 (6th Cir. 1994). Where the purpose of the litigation is to recover damages, then the district court must consider the amount and nature of damages awarded when determining attorney's fees. *Farrar*, 506 U.S. at 115; *see also Cramblit*, 33 F.3d at 635. Where the plaintiff achieves only partial success against the defendant, the district court must consider whether the plaintiff achieved a level of success that makes the hours reasonably expended a satisfactory basis for making a fee award. *Hensley*, 461 U.S. at 434.

Finally, federal fee shifting statutes do not provide for enhancements of fees in order to compensate for the risk of nonpayment when an attorney takes a case on a contingency basis. City of Burlington v. Dague, 505 U.S. 557, 561-63 (1992) (federal fee shifting statutes which authorize a court to award "reasonable attorney's fees" to a "prevailing or substantially prevailing party" do not authorize fee enhancements for the purpose of compensating attorneys hired on a contingency basis for the risk of loss); see also Davis v. Mutual Life Ins. Co. of New York, 6 F.3d 367, 381 (6th Cir. 1993) (holding no fee enhancement due to counsel for taking a

case which impinges significantly on a small practice's ability to take other cases); *Coulter v. Tennessee*, 805 F.2d 146, 149 n. 4 (6th Cir. 1986) ("In short, the lodestar figure includes most, if not all, of the relevant factors comprising a 'reasonable' attorney's fee, and it is unnecessary to enhance the fee for superior performance in order to serve the statutory purpose of enabling plaintiffs to secure legal assistance." (quoting *Pennsylvania v. Del. Valley Citizens' Council for Clean Air*, 478 U.S. 546, 565 (1986))).

Again, the defendants argue that the work claimed is duplicative and unnecessary for several reasons. The defendants argue that the cases should have been brought in one suit. However, the Offers of Judgment rendered the Motion to Consolidate moot. Therefore, there were two separate Judgments and two separate awards. The costs are separate as well. However, in many instances, the plaintiff has billed for the same work in both cases. To the extent that counsel argues that the time was just split in half between the two cases, the total time for performing those tasks was excessive and unreasonable. Moreover, plaintiff's counsel does not address why many of his entries were necessary and reasonable.

This Court relies heavily upon the reasoning and citations to authority in *McGhee v. Buffaloe & Assocs.*, PLC, No. 2:12-CV-333, 2014 WL 2871479, at *1 (E.D. Tenn. June 24, 2014), which addresses most of the issues raised by the defendants. Furthermore, the defendants' arguments are well-taken. First, the time spent in drafting two form-based Complaints is excessive and unreasonable. Second, the time spent drafting responses to the Motion to Consolidate and drafting the Fee Petitions is excessive and unreasonable. Third, the time spent reviewing Court orders and correspondence is excessive and unreasonable. Fourth, the time billed for communicating with the plaintiff is excessive. Fifth, the time billed for drafting the Rule 26(f) report is unreasonable. Sixth, much of the work was unneeded,

considering the timing of the Offers of Judgment. Seventh, the fees incurred for preparation of the fee petition must be reduced. Finally, the hourly rate must be reduced to \$250.00.

The Court will address each of these reductions via the spreadsheet attached to this Order in line item format.² In sum, the plaintiff's motions are GRANTED IN PART AND DENIED IN PART. Counsel shall be awarded fees and costs; however, the fees sought shall be reduced to a total of \$2,033.88 and total costs of \$938.37.

So ordered.

ENTER:

s/J. RONNIE GREER
UNITED STATES DISTRICT JUDGE

² The spreadsheet was originally attached to defendants' filings as Exhibit 26-1. The Court's spreadsheet has the additional column which includes the Court's ruling.

Case		Time-				Amount	determine	Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
			Email to EHM re phone call from								
			Mr. LaPointe: He is being								
			harassed by Midland Credit								
			Management over a GE Money								
			Bank/Wal-Mart Card from about								
			5 years ago. Said the original								
			debt was about \$120 to \$150					1			
			and he made his payments on it								
İ			and they kept adding more and								
			more interest and charges and								
			he couldn't make the payments.								
			He said MCM has been calling	Ì							
			for about 2 or 3 years. He has								
			received at least three letters so								
			far from them all showing								
			different amounts ranging from								
			\$400 to \$600. He has not been								
			sued yet. He said back in June								
			they were calling him 3 to 4 times								
			per day on his cell phone (only								\$23.75
			phone he has) but he only answered 1 or 2 times and told								(defendant
			the man he was a 71 year old								objected
			man on SSI who couldn't afford o								but still
			pay the bill. He was asking if the								included
			different amounts they are telling				Plaintiff not entitled to				amount in
			him is illegal. He will check his				recover time billed				its
			credit reports to see what they				prior to counsel being				proposed
171	9/25/2014	SPI	are reporting.	0.25	\$95.00	\$23.75	retained	0.25	\$95.00	\$23.75	, ,

Case	-	Time-				Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
			Emoit to ELIM to about cell from								
			Email to EHM re phone call from Mr. LaPointe: He is being								
			harassed by Midland Credit								
			Management over a GE Money								
			Bank/Wal-Mart Card from about								
			5 years ago. Siad the original								
			debt was about \$120 to \$150								
			and he made his payments on it								
			and they kept adding more and								
			more interest and charges and								
			he couldn't make the payments.								
			He said MCM has been calling								
			for about 2 or 3 years. He has								
			received at least three letters so		•						
			far from them all showing			•	•		ai.		
			different amounts ranging from								
].			\$400 to \$600. He has not been								
			sued yet. He said back in June								
1 2 4			they were calling him 3 to 4 times								
			per day on his cell phone (only								
			phone he has) but he only								
	, , , , , , , , , , , , , , , , , , ,		answered 1 or 2 times and told								
ŀ			the man he was a 71 year old								
			man on SSI who couldn't afford o pay the bill. He was asking if the								
			different amounts they are telling			i.	그를 보는 것으로 살아.				
			him is illegal. He will check his								
			credit reports to see what they				Identical entry appears				
172	9/25/201	4 SPI	are reporting.	0.25	\$95.00	\$23.75	in bill for both cases.		\$0.00	\$0.00	\$0.00
	3/20/201	-, Q,,,,L		0.23	ψ33.00	Ψ20.70	in bill for both cases.		, Ψυ.υυ 	ΨΟ.Ο Ο	ΨΟ.ΟΟ
			Voicemail from Mr. LaPointe:								
			Mr. LaPointe left a voicemail last				·				
			nightsaid he found three more								
			letters with different amounts as						1		
			well as a list of the phone calls								
171	9/26/201	4 SPI	for a couple of weeks in June	0.05	\$95.00	\$4.75	No objection	0.05	\$95.00	\$4.75	\$4.75

Case	T	ſime-				Amount		Proposed	Proposed	Proposed	Court
No.		eeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
		•					•				
			Voicemail from Mr. LaPointe:								
]			Mr. LaPointe left a voicemail last								
			nightsaid he found three more								
			letters with different amounts as								
			well as a list of the phone calls				Identical entry appears				
172	9/26/2014 SF	PL	for a couple of weeks in June	0.05	\$95.00	\$4.75	in bill for both cases.	0	\$0.00	\$0.00	\$0.00
474	40/0/44	5 1	Call from client discussed fee	0.45	205.00	044.05	Nia - Lia-tia-	0.45	005.00	044.05	044.75
171	10/3/14 SF	'L	arrangements	0.15	\$95.00	\$14.25	No objection	0.15	\$95.00	\$14.25	\$14.75
			Call from client discussed fee				Identical entry appears				
172	10/3/14 SF))	arrangements	0.15	\$95.00	\$14.25	in bill for both cases.	.0	\$0.00	\$0.00	\$0.00
11/2	10/3/14 01	_	Initial office consulation with Mr.	0.13	ψ93.00-	ψ14.25	in bill for both cases.		Ψ0.00	, ψ0.00	Ψ0.00
171	10/7/14 EH	нм	Lapointe	0.5	\$300.00	\$150.00	Excessive rate	0.5	\$250.00	\$125.00	\$125.00
			1	0.0	Ψσσσ.σσ	4 (00.00)	Excessive rate;	0.0	1 420.00	V0.00	4.20.00
							unreasonable time				
		•					entry, if the initial				
			Initial office consulation with Mr.				consultation was half				
172	10/7/14 EH	-IM	Lapointe	0.5	\$300.00	\$150.00	an hour	0	\$0.00	\$0.00	\$0.00
			Voicemail from Mr. LaPointe: He								
			found another letter from MCM								
			with a different amount. He will								
l			put it with the other paperwork	_							
171	10/8/14 SF	PL	you gave him.	0.1	\$95.00	\$9.50	No objection	0.1	\$95.00	\$9.50	\$9.50
							Identical entry appears				
							in bill for both cases;				
			Voicemail from Mr. LaPointe: He				entry references one				
			found another letter from MCM				letter, which likely				•
			with a different amount. He will				pertains to only one				
14			put it with the other paperwork				case, yet time is billed				
172	10/8/14 SF	PL	you gave him.	0.1	\$95.00	\$9.50	to both cases.	0	\$0.00	\$0.00	\$0.00
			Section 1 sectio	1							
			Voicemail from Mr. LaPointe: He								
			received more collection letters								
			will be working next two days and								
			will try to mail this latest one to								
171	12/22/14 SF	PL	you on Wednesday.	0.1	\$95.00	\$9.50	No objection	0.1	\$95.00	\$9.50	\$9.50
			Voicemail from M. II Deide III-								
			Voicemail from Mr. LaPointe: He received more collection letters								
			will be working next two days and								
			will try to mail this latest one to				Identical entry appears				
172	12/22/14 SF	PL	you on Wednesday, 70, 150, MG	0.1_	\$95.00	\$9.50	in bill for both cases.	0	\$0.00	\$0.00	\$0.00
L			Case 2:15-cv-00172-JRG-MC	:LCD	ocůment	32-1**File	ed 06/20/16 * Päğe 3	l ot 20 - P é	ageID #	+0.00	Ţ0.00

Case		Time-				Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
171	1/7/15	SPI	Call from Mr. LaPointe: He has broken his cell phone which is the number we have on file for him. He wanted to give you an alternative phone numner to reach him on until he can get his cell phone reactivated. The alternate number is XXX-XXX-8527. He said you were supposed to be filing a lawsuit for him and he didn't want to miss any of your calls.	0.15	\$95.00	\$14 2 5	Time is excessive and unreasonable.	0.1	\$95.00	\$9.50	\$9.50
17.14	17713	OI L		0.15	Ψ93.00	⊕ 14.25 :	umeasonable.		ψ93.00	η ψ9.50 <u>[</u>	Ψ9.50
	gen Gwenner		Call from Mr. LaPointe: He has broken his cell phone which is the number we have on file for him. He wanted to give you an alternative phone numner to reach him on until he can get his		•						
			cell phone reactivated. The alternate number is XXX-XXX-8527. He said you were supposed to be filing a lawsuit for him and he didn't want to miss				Time is excessive and unreasonable; exact same entry appears in				
172	1/7/15	SPL	any of your calls.	0.15	\$95.00	\$14.25	bill for both cases.	0	\$0.00	\$0.00	\$0.00
			Client called and said he received more letters from Midland Credit and wanted to know if he should send them in and I told him yes to go ahead and send them. He wanted to know if we had any idea when this would be filed because he had been waiting since October. I told him I would pass the								
171	2/3/15	SPL	message a long to Mr. Mechem.	0.15	\$95.00	\$14.25	No objection	0.15	\$95.00	\$14.25	\$14.25

Case		Time-				Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
			Client called and said he								
			received more letters from								
			Midland Credit and wanted to								
			know if he should send them in								
			and I told him yes to go ahead								
			and send them. He wanted to								
			know if we had any idea when								
			this would be filed because he								
			had been waiting since October.								
			I told him I would pass the				Identical entry appears				
172	2/3/15	SPL	message a long to Mr. Mechem.	0.15	\$95.00	\$14.25	in bill for both cases.	0	\$0.00	\$0.00	\$0.00
			Call from Client: He said you			·					
			were going to send him some					A delication of the state of th			
			paperwork in March and he was								
			just following up. Call him if you						C C		
171	3/19/15	SPL	have any news.	-0.1	\$95.00	\$9.50	No objection	0.1	\$95.00	\$9.50	\$9.50
			Call from Client: He said you							_	
			were going to send him some								
			paperwork in March and he was								
	37 441		just following up. Call him if you				Identical entry appears				
172	3/19/15	SPL	have any news.	0.1	\$95.00	\$9.50	in bill for both cases.	0	\$0.00	\$0.00	\$0.00
			Client called regarding status of								
			documents he thought the firm								
			was sending him this month. I								
			asked him if had requested his								
			credit reports and he said no.								
			After talking to him, I sent the								
			credit report request form to his								
			email address. He will complete								
			that and send it off and will send								
			the credit reports to us when he								
			receives them. He also has 3 or								
			4 more letters that he will send								
171	3/27/15	SPL	as well.	0.15	\$95.00	\$14.25	No objection.	0.15	\$95.00	\$14.25	\$14.25

Case		Time-				Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
			Client called regarding status of documents he thought the firm was sending him this month. I asked him if had requested his credit reports and he said no. After talking to him, I sent the credit report request form to his								
			email address. He will complete that and send it off and will send								
Ağırını			the credit reports to us when he								
			receives them. He also has 3 or								
			4 more letters that he will send				Identical entry appears				
172	3/27/15	SPL	as well.	0.15	\$95.00	\$14.25	in bill for both cases.	0	\$0.00	\$0.00	\$0.00
			Mr. LaPointe called. he received the credit report form and wanted to make sure what he needed to do. I told him he needed to complete the form, fill in the circles next to the credit reporting agency and mail it to the address at the top of the form. Told him it would take about 2 weeks and he would get all 3 credit reports.								
			He will send those in as he gets them. He also received 3 other letters from Midland and will								
171	3/30/15	SPL	send those as well.	0.2	\$95.00	\$19.00	No objection.	0.2	\$95.00	\$19.00	\$19.00

Case		Time-					Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper		Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
172	3/30/15	SPL	the credit rep to make sure do. I told him complete the circles next to agency and r at the top of t would take al he would get He will send them. He als letters from M send those a Call from Mr.	called. he received out form and wanted what he needed to he needed to form, fill in the to the credit reporting mail it to the address the form. Told him it bout 2 weeks and all 3 credit reports. It has ein as he gets to received 3 other Midland and will swell. LaPointe: He said the credit report		\$95.00		entical entry appear bill for both cases.	s 0	\$0.00	\$0.00	\$19.00
171	4/30/15	SPI	form you gave and haven't report yet. Howould send in receive it. Howordship put this time. He	re him a month ago received this credit le also said you in for him if he didn't e said you should is actual full name e just probably put inte and his whole	0.15	\$95.00	\$14 25 No	o objection	0.15	\$95.00	\$14.25	\$14.25
17.1	7/30/13	OI L		LaPointe: He said	0.15	ψ33.00	Ψ14.23 IV		0.13 Valska 1.4. (*)	Ψ33.00	Ψ1-1.20	Ψ17.20
				the credit report	Britishin.		ashali b					
				e him a month ago								
			and haven't r	eceived this credit								
			report yet. H	le also said you 🐃 🖠								
				n for him if he didn't								
				e said you should								
	4. 4		1 M F L R H	is actual full name								
				e just probably put						搜引起情 訪		
				nte and his whole		11-						
			name is Rus	sell Steven		vei Lidali		entical entry appear				
172	4/30/15	SPL	LaPointe.		0.15	\$95.00	\$14.25 in	bill for both cases.	i egitet et 0	\$0.00	\$0.00	\$0.00

Case		Time-				Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
			Call from Mr. LaPointe -								
			message to Everett: We called								
		İ	him last week about coming in to								
			talk to you before filing two								
			possible FDCPA complaints for								
			letters v Credit reports with								
171	6/8/15	SPI	inaccurate numbers.	0.15	\$95.00	\$14 25	No objection	0.15	\$95.00	\$14.25	\$14.25
	0,0,,0	,		3.13	400.00	¥=0	±.		, , , , , , ,		
			Call from Mr. LaPointe -								
			message to Everett: We called								
			him last week about coming in to								
			talk to you before filing two								
			possible FDCPA complaints for								
			letters v Credit reports with				Identical entry appears		40.00		**
172	6/8/15	SPL	inaccurate numbers.	0.15	\$95.00	\$14.25	in bill for both cases.	· C	\$0.00	\$0.00	\$0.00
-			•				Excessive rate;		1		
							excessive time for			1	
:							copied-and-pasted	ļ			
			Decearsh and propered droft				complaint; contains	Í			
171	6/10/15	ELINA	Research and prepared draft	2.5	¢200.00	\$1,050.00	unnecessary time for	1.2	\$250.00	\$300.00	\$300.00
17.11	0/10/13	CHIVI	complaint re Midland/WalMart	3.5	\$300.00	\$1,050.00	Excessive rate;	1. 2 	. \$250.00	#300.00 _[\$300.00
							excessive time for				
							copied-and-pasted				
			達 一次 清楚 (1)				complaints; contains				
							unnecessary time for				0.5 x
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			Research and prepared draft				research; separate				\$250=
172	6/10/15	ЕНМ	complaint re Midland/JC Penney	3.5	\$300.00	\$1,050.00	lawsuit unnecessary	C	\$0.00		\$125.00
127,000			SALEEBBERGERGERGERGERGERGERGERGERGERGERGERGERGE				The respective of the contract	The first control of the control of			
			Email to Mr. LaPointe with								
			attachments for review and								
			signature: Mr. LaPointe,	,							
			Attached for your review is a								
			complaint against Midland								
			Funding and Midland Credit								
			regarding the GE/Money								
			Bank/Wal-Mart account. Please								
			let me know if there are any								
			changes or corrections. If none,								
			please sign the attached Oath								
174	6/40/45	CDI	and return to us. Your signature	0.0	<u></u>	600.50	Mo objection		, ene on	\$00 E0	600.50
171	6/10/15	SPL	will need to be notarized.	0.3	\$95.00	\$28.5U	No objection	0.3	\$95.00	\$28.50	\$28.50

Case	Time-				Amount		Proposed	Proposed	Proposed	Court
No.	Date Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
		Email to Mr. LaPointe re: 2nd								
		case - Midland/JC Penney: Mr.								
		LaPointe, Attached is the								
		complaint against Midland								
		Funding/Midland Credit on the								
		GEMB/JC Penney account.								
		Please review this and let me								
		know if there are any corrections								
		or changes. If not, please print								
		and sign the attached Oath in								
		front of a notary and return it to our office. If you have any			19.5 TO 1	two identical emails				
		questions please call. Thank				vere sent regarding				
172	6/11/15 SPL	you.	0.3	\$95.00		each matter.	0	\$0.00	\$0.00	\$0.00
<u>-</u>	0/11/10/01/2	, jour	0.0	Ψ00.00	Ψ20.00	aon mattor.	.			Ψ0.00
		Mr. LaPointe called regarding the						_		
		emails I sent him. He is to print								
		off the oaths for each complaint								
		and sign them in front of a notary								
	e e e e e e e e e e e e e e e e e e e	and send them back to us. He								
		said he would do that. He							C	
		wanted to know if I though								
		Midland would sue him after we								
474	04045 001	do this. I told him he needed to		205.00	200 50	1. 1. 1. 1. 1. 1.		205.00	200.50	200.50
171	6/12/15 SPL	talk to Everett at that point.	0.3	\$95.00	\$28.50 1	lo objection	0.3	\$95.00	\$28.50	\$28.50
		Mr. LaPointe called regarding the								
		emails I sent him. He is to print								
		off the oaths for each complaint								
		and sign them in front of a notary								
		and send them back to us. He								
		said he would do that. He								
		wanted to know if I though								
		Midland would sue him after we								
		do this. I told him he needed to				dentical entry appears				
172	6/12/15 SPL	talk to Everett at that point.	0.3	\$95.00	\$28.50 ii	n bill for both cases.	0	\$0.00	\$0.00	\$0.00

Case		Time-				Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
		•	Called client to follow up				-				
			regarding his approval to file								
			complaints. Also explained to								
			him that the statute was running								
			on some of the letters and he								
			said he wasn't worried about								
			that, that he had 4 or 5 more								
171	6/12/15	SPI	letters from them.	0.25	\$95.00	\$23.75	No objection	0.25	\$95.00	\$23.75	\$23.75
	0/12/13	OI L	Called client to follow up	0.20	Ψ55.00	42 0.70		, 0.20	, ,	+	
			regarding his approval to file								
			complaints. Also explained to								
			him that the statute was running								
			on some of the letters and he								
			said he wasn't worried about								
							Identical entry appears				
170	6/12/15	CDI	that, that he had 4 or 5 more letters from them.	0.25	\$95.00	¢22.75	in bill for both cases.	0	\$0.00	\$0.00	\$0.00
172	0/12/15	SPL	letters from them.	0.25	\$95.00	\$23.75	in pili ioi potii cases.	1	ψ0.00	, ψ0.00	Ψ0.00
. 474	0/45/45		Descrived message to call client	0.4	£200 00	¢20.00	Evenesive rete	0.1	\$250.00	\$25.00	\$25.00
171	6/15/15	FHIM	Received message to call client	0.1	\$300.00	\$30.00	Excessive rate	0.1	\$250.00	\$25.00	Ψ23.00
							Excessive rate; time is				
							excessive rate, time is				
							unreasonable, as entry				
, , , , ,	_,,_,_				****	000.00	for the same activity is		\$0.00	¢0.00	00.00
172	6/15/15	FHM	Received message to call client	0.1	\$300.00	\$30.00	billed to both cases	, 0	\$0.00	\$0.00	\$0.00
			Returned call to client re	2.05		475.00	5	0.05	#050.00	¢60.50	# 60 F0
171	6/15/15	EHM	questions on complaint, etc.	0.25	\$300.00	\$75.00	Excessive rate	0.25	\$250.00	\$62.50	\$62.50
							Excessive rate; time is				
							excessive and		Kalana.		
							unreasonable, as entry				
			Returned call to client re	EW 1		. Ne parcier	for the same activity is		11 4		40.00
172	6/15/15	EHM	questions on complaint, etc.	0.25	\$300.00	\$75.00	billed to both cases		\$0.00	\$0.00	\$0.00
			Filed complaint								
			Midland/WalMart Penney,								
171	6/22/15	SPL	summonses and cover sheet	1	\$95.00	\$95.00	No objection	1	\$95.00	\$95.00	\$95.00
							Time is excessive and				
4. HE							unreasonable; time				
			그 그 바다 가는 그리 꽃을 다고 있었다.				billed for unnecessarily				
			Filed complaint Midland/JC				filing separate lawsuit;		供证据决		
			Penney, summonses and cover				same entry appears in		医透透性 5.		
172	6/22/15	SPL	sheet		\$95.00	\$95.00	both bills	C	\$0.00	\$0.00	\$0.00

Case		Time-				Amount		Proposed	Proposed	Proposed	Court
No.	Date	Кеерег	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
			Reviewed Court's Order re case # 2:15-cv-171 and #2:15-cv-172 are related and need to be assigned to same judge, Judge				•				.
171	7/1/15	ЕНМ	Greer Reviewed Court's Order re case # 2:15-cv-171 and #2:15-cv-172 are related and need to be	0.1	\$300.00	\$30.00	Excessive rate	0.1	\$250.00	\$25.00	\$25.00
			assigned to same judge, Judge				Excessive rate; billed				
172	7/1/15	EHM	Greer	0.1	\$300.00	\$30.00	twice for same task	1 1 0 1 0 1	\$0.00	\$0.00	\$0.00
	- 1011		Reviewed Court's Order re 2:15-cv-171; filing of 12(b) motions discourage if defect can be cured	3							
171	7/2/15	EHM	by filing an amended pleading	0.1	\$300.00	\$30.00	Excessive rate	0.1	\$250.00	\$25.00	\$25.00
							Time is unreasonable, time billed for		. · ·		
			Prepared and filed Summons				preparation of summons in second lawsuit when claims				
			returned executed as to Midland		delinates de la company de la company de la company de la company de la company de la company de la company de		should have been				
172	7/2/15	SPL	Funding in #2:15-cv-172	0.2	\$95.00	\$19.00	brought in one lawsuit	0	\$0.00	\$0.00	\$19.00
			Prepared and filed Summonses returned executed as to Midland Funding and Midland Credit in								
171	7/10/15	SPL	#2:15-cv-171	0.3	\$95.00	\$28.50	No objection	0.3	\$95.00	\$28.50	\$28.50
							Time is unreasonable,				
							as time billed for preparation of				
							summons in both				
			Prepared and filed Summons				lawsuits when claims				
			returned executed as to Midland				should have been				
172	7/10/2015	SPL	Credit in #2:15-cv-172 Received email from opposing counsel with proposed	0.2	\$95.00	\$19.00	brought in one lawsuit	0	\$0.00	\$0.00	\$19.00
171	7/17/2015	EHM	stipulations and responded to same	0.15	\$300.00	64E UU	Excessive rate	0.45	¢250.00	¢27.50	607 E 0
- ' ' '	77 1772013	1 11VI	Carrio	0.10	φ500.00	φ 4 5.00	LACESSIVE TALE	0.15	\$250.00	\$37.50	\$37.50

Case		Time-			• **	Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry Received email from opposing counsel with proposed	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
			stipulations and responded to				Excessive rate; billed				
172	7/17/2015	EHM	same	0.15	\$300.00	\$45.00	twice for same task		\$0.00	\$0.00	\$37.50
			Phone conference with opposing counsel, Frank Springfield re extension of time to file								
171	7/17/2015	EHM	answer/response in both cases	0.15	\$300.00	\$45.00	Excessive rate	0.15	\$250.00	\$37.50	\$37.50
			Phone conference with opposing counsel, Frank Springfield re								
170	7/17/2015		extension of time to file	0.15	6200 00	645.00	Excessive rate; billed twice for same task	. 0	\$0.00	\$0.00	60 00
172	7/17/2015		answer/response in both cases	0.15	\$300.00	\$45.00	twice for same task		\$0.00	\$0.00	\$0.00
		·	Reviewed Stipulations of Extension of Time filed by								•
171	7/17/2015	EHM	opposing counsel on both cases	0.15	\$300.00	\$45.00	Excessive rate	0.15	\$250.00	\$37.50	\$37.50
			Reviewed Stipulations of Extension of Time filed by				Excessive rate; billed twice for same task;				
172	7/17/2015	EHM	opposing counsel on both cases Reviewed Court's Order re scheduling orders, etc. on #2:15-	0.15	\$300.00	\$45.00	only one case needed		\$0.00	\$0.00	\$0.00
171	7/22/2015	ЕНМ	cv-171	0.3	\$300.00	\$90.00	Excessive rate	0.3	\$250.00	\$75.00	\$75.00
			Received message to call							· · · · · · · · · · · · · · · · · · ·	···
171	7/31/2015	EHM	opposing counsel	0.1	\$300.00	\$30.00	Excessive rate	0.1	\$250.00	\$25.00	\$25.00
	=:04:004=		Received message to call				Excessive rate; billed				
172	7/31/2015	EHM	opposing counsel Prepared Settleemnt Demand letter to opposing counsel on	0.1	\$300.00	\$30.00	twice for same task	 -	\$0.00	\$0.00	\$0.00
171	8/5/2015	ЕНМ	both cases	0.15	\$300.00	\$45.00	Excessive rate	0.15	\$250.00	\$37.50	\$37.50
			Prepared Settleemnt Demand letter to opposing counsel on				Excessive rate; billed twice for same task;				
172	8/5/2015	FHM	both cases	0.15	\$300.00	\$45.00	only one case needed	·	\$0.00	\$0.00	\$0.00
	5/5/2013	CI IIVI	Reviewed Unopposed Motion for Extension of Time to File Answer		φουύ.υυ	Ψ40.00	orny one case needed		# #0.00 	i (1) (1) (1) (1) (1) (1) (1) (1) (1) (1)	Φ0.00
171	8/10/2015	EHM	in 2:15-cv-171	0.1	\$300.00	\$30.00	Excessive rate	0.1	\$250.00	\$25.00	\$25.00

Case		Time-				Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
							Excessive rate; time				
							billed for review of				
							motion in second				
:							lawsuit unnecessary				
			Reviewed Unopposed Motion for				because claims could				
			Extension of Time to File Answer				have been filed in one				
172	8/10/2015	EHM	in 2:15-cv-172	0.1	\$300.00	\$30.00	lawsuit	0	\$0.00	\$0.00	\$0.00
			Reviewed Court's notice								
			regarding granting Defendants'								
474	0/44/0045		Motions for Extension of Time to				Excessive rate;				
171	8/11/2015	EHM	file Answers in both cases	0.15	\$300.00	\$45.00	excessive time	0.1	\$250.00	\$25.00	\$25.00
							Excessive rate;				
							excessive time; time				
							billed for review of				
							motion in second				
			Deviewed County water				lawsuit unnecessary				
	•		Reviewed Court's notice			•	because claims could		•		
			regarding granting Defendants'				have been filed in one				
172	8/11/2015		Motions for Extension of Time to	0.45	# 200.00	645.00	lawsuit; billed twice for	0	#0.00	* 0.00	20.00
172	0/11/2015	⊏⊓IVI	file Answers in both cases	0.15	\$300.00	\$45.00	same task	. 0	\$0.00	\$0.00	\$0.00
			Mr. LaPointe called regarding								
			status of his cases. Told him					1			
			that the Court gave Midland until								
			August 24 to file an Answer.								
			Told him we would let him know					† !			
171	8/13/2015	SPL	if anything happened before that.	0.15	\$95.00	\$14.25	No objection	0.15	\$95.00	\$14.25	\$14.25
	:	J		3.10	Ψοσ.σσ	Ψ17.20	into objection	0.10	Ψ33.00	Ψ14.23	Ψ17.20
			Mr. LaPointe called regarding								
			status of his cases. Told him								
		y aire Marke	that the Court gave Midland until								
			August 24 to file an Answer.			41041					
			Told him we would let him know			A. Marie	Identical entry appears				
172	8/13/2015	SPL	if anything happened before that.	0.15	\$95.00	\$14.25	in bill for both cases.	0	\$0.00	\$0.00	\$0.00
			Reviewed Court's Order re								
			discouraging filing of 12(b)								
			Motion in 2:15-cv-172 if defect								
			can be cured by filig amended				Excessive rate; only		ati dhibba		
172	8/17/2015	EHM	pleading.	0.15	\$300.00	\$45.00	one case needed	0	\$0.00	\$0.00	\$0.00
							Unnecessary time, as				· · · · · · · · · · · · · · · · · · ·
			Drafted proposed Report of				Defendants had not				
			Parties' Planning Meeting and				even answered or				
			emailed to opposing counsel in				otherwise responded				
171	8/21/2015	SPL	2:15-cv-171 Case 	., _0.6	\$95.00	\$57_00	to complaint. d 06/20/16 Page 1	۵ ۵	\$0,00 ageID #.	\$0.00	\$0.00

Case		Time-	1001 0 1000 1000			Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
		i					Excessive rate;				
							unnecessary time, as				
1							Defendants had not				
			Reviewed and revised draft				even answered or		1		
			Report of Parties' Planning				otherwise responded				
171	8/21/2015	EHM	Meeting	0.8	\$300.00	\$240.00	to complaint.	0	\$0.00	\$0.00	\$0.00
			Reviewed documents filed by				Excessive rate;				
İ			opposing counsel: Motion and				contains unnecessary				
			Memo to Consolidate Cases;				time toward				
			Offers of Judgment on both				researching				
			cases; Certificates of Corporate				consolidation because				
			Interest for defendants, Answers	:			Offers of Judgment				
			on both cases; research				should have been				
171	8/24/2015	EHM	regarding consolidation	1.25	\$300.00	\$375.00	discussed with Plaintiff	0.2	\$250.00	\$50.00	\$50.00
'	•			٠. '			'	1	,	_	
•		•			į.		Excessive rate;	v		•	
							contains unnecessary				
							time toward				
							researching				
							consolidation because				
					Pilota III ede		Offers of Judgment				
							should have been				
							discussed with				
			Reviewed documents filed by				Plaintiff; contains				
			opposing counsel: Motion and				unnecessary time as				
			Memo to Consolidate Cases;				Plaintiff could have				
			Offers of Judgment on both				filed one lawsuit; billed				
			cases; Certificates of Corporate				twice for same task;				
			Interest for defendants; Answers		등 싫어 그는 그		Motion to Consolidate				
			on both cases; research				not filed in Case No.				
172	8/24/2015	EHM	regarding consolidation	1.25	\$300.00	\$375.00	172	in in the contract of the cont	\$0.00	\$0.00	\$0.00
			Reviewed Court's Orders in both]							
			cases re availability of magistrate				Excessive rate;				
171	8/25/2015	ЕНМ	judge	0.15	\$300.00	\$45.00	excessive time	0.1	\$250.00	\$25.00	\$25.00
									ń Pale.		
							Excessive rate;				
							excessive time;				
							contains unnecessary				
트림션							time as Plaintiff could				
100			Reviewed Court's Orders in both				have filed one lawsuit;				
			cases re availability of magistrate				billed twice for same	40 mm			
172	8/25/2015	EHM .	judge	0.15	\$300.00	\$45.00	task	C	\$0.00	\$0.00	\$0.00

Case	-	Time-				Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
			Prepared and filed Motion for								
Î			Extension of Time to File Report								
171	9/3/2015	FHM	of the Parties' Planning Meeting	0.4	\$300.00	\$120.00	Excessive rate	0.4	\$250.00	\$100.00	\$100.00
- '	0.0.20.0			0. 1	- + + + + + + + + + + + + + + + + + + +	— 	Excessive rate;		V=00.00	V.100.00	
							contains unnecessary				
i			Researched and drafted				time toward response				
			response to Motion to				to motion to				
171	9/4/2015	EHM	Consolidate cases	3	\$300.00	\$900.00	consolidate	0	\$0.00	\$0.00	\$0.00
							Excessive rate;				
							contains unnecessary				
							time toward response				
							to motion to				
							consolidate; contains				
							time billed to draft				
			Researched and drafted				response to motion		•		
			response to Motion to				that was not filed in				
- 172	9/4/2015	EHM	Consolidate cases	3	\$300.00	\$900.00	Case No. 172	. 0	\$0.00	\$0.00	\$0.00
							Excessive rate;				
							contains unnecessary				
			Reveiwed and revised draft				time toward response				
			Response to Motion to				to motion to			-	
171	9/5/2015	ЕНМ	Consolidate cases	3	\$300.00	\$900.00	consolidate.	0	\$0.00	\$0.00	\$0.00
							Excessive rate;				
							contains unnecessary				
							time toward response				
							to motion to				
			는 선생님 경기에 가는 경기 있는데 보다. 				consolidate; contains				
							time billed to draft			e in Later, poi la place disconsidera Later de Company de la company de la company La company de la company de la company de la company de la company	
			Reveiwed and revised draft				response to motion				
170	0/5/0045	7 3 3 4 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	Response to Motion to		000000	¢000 00	that was not filed in		60.00	60.00	60.00
172	9/5/2015	EHIVI	Consolidate cases	3 	\$300.00	\$900.00	Case No. 172	. 0	\$0.00	\$0.00	\$0.00
			Finalized and filed Response in Opposition to Motion to								
			Consolidate cases. Spoke with				Excessive rate;				
			client regarding Offer of				contains unnecessary				
			Judgment. Prepared and filed				time toward response				
			Notice of Acceptance of Offer of				to motion to				
171	9/8/2015	ЕНМ	Judgment	1.1	\$300.00	\$330.00	consolidate	0.4	\$250.00	\$100.00	\$100.00

Case		Time-	Th.			· — . —	Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Т	ime	Rate	Billed	Objection	Time	Rate	Total	Ruling
172	9/8/2015	ЕНМ	Finalized and filed Responsition to Motion to Consolidate cases. Spoke client regarding Offer of Judgment. Prepared and Notice of Acceptance of Judgment	e with	1.1	\$300.00	\$330.00	Excessive rate; contains unnecessar time toward respons to motion to consolidate; contains time billed to draft response to motion that was not filed in Case No. 172; only one case needed	e	\$0.00	\$0.00	\$0.00
171	9/8/2015		Received email from Fra Springfield: Everett, I an receipt of your notice of acceptance of Midland's of Judgment for the two cases. If you will please me your fees and expenseach case, we can see if get everything workf out having to involve the Couthose. Thanks.	Offers LaPointe forward ses for we can without urt to set	0.15	\$300.00		Excessive rate; excessive time	0.1			\$25.00
172	9/8/2015		Received email from Fra Springfield: Everett, I an receipt of your notice of acceptance of Midland's of Judgment for the two cases. If you will please me your fees and expeneach case, we can see if get everything workf out having to involve the Cothose. Thanks. Received email from Joh Marshall Smith, Judge Claw clerk, and opposing counsel's response to sa since plaintiff accepted Company of the service of t	nk or in Offers LaPointe forward ses for we can without urt to set orker's	0.15	\$300.00		Excessive rate; excessive time; bille twice for same task				\$0.00
171	9/9/2015	ЕНМ	Judgment in both cases motion to consolidate an request for extension of now moot 235 cv-00172-3	if the d time are	0.15	\$300.00 ocument	32-1 ^{\$4<u>5.00</u>}	Excessive rate; excessive time d 06/20/16 Page	16 of 20 ⁰ 0	\$250.00 age1D#:	\$25.00	\$25.00

Case		Time-	-			Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
			Received email from John								
			Marshall Smith, Judge Corker's								
			law clerk, and opposing								
			counsel's response to same, since plaintiff accepted Offer of								
			Judgment in both cases if the								
			motion to consolidate and				Excessive rate;				
			request for extension of time are				excessive time; billed				
172	9/9/2015	EHM	now moot.	0.15	\$300.00	\$45.00	twice for same task	0	\$0.00	\$0.00	\$0.00
171	9/9/2015	EHM	Reviewed Court's Judgment	0.1	\$300.00	\$30.00	Excessive rate	0.1	\$250.00	\$25.00	\$25.00
							Excessive rate and				
							time; should only be				
172	9/9/2015	EHM	Reviewed Court's Judgment	0.1	\$300.00	\$30.00	one case		\$0.00	\$0.00	\$0.00
							C		!		
							Excessive rate; contains unnecessary				
İ			Research and drafted Motion for				time toward recycled			!	
1			attorney fees & costs & Memo in				fee petition; fee	İ	! 		
171	9/21/2015	EHM	support	3.2	\$300.00	\$960.00	incurred after OOJ	0	\$0.00	\$0.00	\$47.63
				1 4		·					
							Excessive rate;				
			마음 (148 - 148) 경기 등 등 기				contains unnecessary				
			Research and drafted Motion for				time toward recycled				
	0/04/0045		attorney fees & costs & Memo in	0.0	0000.00	0000.00	fee petition; fee		00.00	CO OO	#0.00
172	9/21/2015	EHM	support	3.2	\$300.00	\$960.00	incurred after OOJ	0	\$0.00	\$0.00	\$0.00
			Client called regarding status of his case. I told him that WHM								
			was talking to opposing counsel								
			re settlement. I told him that	1							
			what EHM was trying to do was								
			to get them to write the debt off								
			(couldn't guarantee this), get				Fee incurred after OO.	J			
			EHM's fees and statutory				accepted; trying to				
-			damages for him. I told him that				strike a new deal that				
	0.000.000		we would call him if EHM got his				was not part of the		405.55	22.22	000.50
171	9/23/2015	SPL	case settled.	0.3	\$95.00	\$28.50	case	C	\$95.00	\$0.00	\$28.50

Case		Time-				Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
		•	Client called regarding status of				-				
			his case. I told him that WHM								
			was talking to opposing counsel								
			re settlement. I told him that								
			what EHM was trying to do was								
			to get them to write the debt off								
			(couldn't guarantee this), get								
			EHM's fees and statutory								
			damages for him. I told him that				Fee incurred after OOJ				
			we would call him if EHM got his				accepted; billed twice				
172	9/23/2015	SPI	case settled.	0.3	\$95.00	\$28.50	for same task	0	\$0.00	\$0.00	\$0.00
	0,20,20,10			0.0	4 55.55	420.00	Excessive rate; fee		1		
			Phone call to opposing counsel				incurred after OOJ				
171	9/23/2015	FНM	regarding fees and expenses	0.15	\$300.00	\$45 00	accepted	0	\$250.00	\$0.00	\$37.50
•••	0/20/2010		Togalamig root and expenses	0.70	Ψοσο.σο	¥ .0.00	Excessive rate; billed	:		1 1 1 1	
							twice for same task;				
			Phone call to opposing counsel				fee incurred after OOJ				
172	9/23/2015	FHM	regarding fees and expenses	0.15	\$300.00	\$45.00	accepted	0	\$0.00	\$0.00	\$0.00
	0/20/20 10					4 10.00	Excessive rate; billed			Γ	
			Email to opposing counsel o				twice for same task;	•			
			follow up on phone call regarding				fee incurred after OOJ				
171	9/23/2015	FHM	fees and expenses	0.15	\$300.00	\$45.00	accepted	0	\$250.00	\$0.00	\$37.50
• • • • •	1.	; — ; ; ;	The state of the s	, 0.10	Ψοσο.σο	ψ 10.00	Excessive rate; billed	,	1 ,		
			Email to opposing counsel o		April 2000 Aug.		twice for same task;				
			follow up on phone call regarding				fee incurred after OOJ				
172	9/23/2015	FHM	fees and expenses	0.15	\$300.00	\$45.00	accepted	0	\$0.00	\$0.00	\$0.00
	0/20/2010				4,000.00	Ψ 10.00	Excessive rate; fee]			,
			Email from opposing counsel				incurred after OOJ				
171	9/23/2015	FHM	regarding fees and expenses	0.15	\$300.00	\$45.00	accepted		\$250.00	\$0.00	\$37.50
	7.20.2010		A 1 : 이번 12 : 1 : 1 : 1 : 1 : 1 : 1 : 1 : 1 : 1	0.10		70,410	Excessive rate; billed	Late of			
							twice for same task;				
			Email from opposing counsel				fee incurred after OOJ	일삼시간 64			
172	9/23/2015	ЕНМ	regarding fees and expenses	0.15	\$300.00	\$45.00	accepted	C	\$0.00	\$0.00	\$0.00
112	3/20/2010	 	Received email from opposing	0.10	Ψ.Ο.Ο.Ο.	, , , , φ,,ο.ου		1		[
			counsel re breakdown of fees				Excessive rate; fee				
171	9/23/2015	EHM	and expenses	0.15	\$300.00	\$45.00	incurred after OOJ		\$250.00	\$0.00	\$37.50
17.11	3/23/2013			3.13	Ψ000.00	Ψ-0.00	Excessive rate; billed	1	· · · · · · · · · · · · · · · · · · ·	h i varas	
			Received email from opposing				twice for same task;			n erallo	
			counsel re breakdown of fees				fee incurred after OOJ				
172	9/23/2015	ELINA	and expenses	0.15	\$300.00	\$45.00	accepted	(\$0.00	\$0.00	\$0.00

Case	100	Time-	1000			Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate	Billed	Objection	Time	Rate	Total	Ruling
			:				Excessive rate; fee				
							incurred after OOJ				
			1				accepted;				
							unnecessary time				
			Prepared draft Joint Motion for				toward motion for				
			Extension to file Plaintiff's Motion				attorney's fees; fees				
			for Attorney fees and Costs and				could have been				
4-4	40/0/0045		emailed same to Frank				avoided if motion				
171	10/8/2015	EHM	Springfield	0.15	\$300.00	\$45.00	timely filed	0	\$250.00	\$0.00	\$0.00
							Excessive rate; billed				
							twice for same task;				
							fee incurred after OOJ				
							accepted;				
					e de la companya de l		unnecessary time				
			Prepared draft Joint Motion for				toward motion for				
			Extension to file Plaintiff's Motion				attorney's fees; fees				
			for Attorney fees and Costs and emailed same to Frank		•		could have been				
171	10/8/2015		Springfield	0.45	#200 oo	Ø45.00	avoided if motion		60.00	60.00	# 0.00
17.1	10/0/2013			0.15	\$300.00	\$45.00	timely filed		\$0.00	\$0.00	\$0.00
					9		Excessive rate; fee incurred after OOJ				
							accepted;				
							unnecessary time				
							toward motion for				
							attorney's fees; fees				
			Received email from opposing				could have been				
			counsel re proposed Joint Motion				avoided if motion				
171	10/8/2015	ЕНМ	and replied to same	0.15	\$300.00	\$45.00	timely filed	0	\$250.00	\$0.00	\$0.00
E.				3.13			Excessive rate; billed		Ψ200.00	Ψ0.00,	Ψ0.00
							twice for same task;				
							fee incurred after OOJ				
							accepted;				
							unnecessary time				
							toward motion for				
							attorney's fees; fees				
			Received email from opposing				could have been				
			counsel re proposed Joint Motion				avoided if motion				
172	10/8/2015	EHM	and replied to same	0.15	\$300.00	\$45.00	timely filed	0	\$250.00	\$0.00	\$0.00
							Excessive rate; fee				
							incurred after OOJ				
			Received 2nd email from				accepted;				
			opposing counsel regarding				unnecessary time				
4=:	101010-		changes to proposed Joint			2	toward motion for				
171	10/8/2015	EHM	Motion 15 ov 00172 1DC MC	ر D.15	\$300,00	oo 1\$45-90	attorney's fees d 06/20/16 Page 1	a of 20 19	37250,00	\$0.00	\$0.00

ase	-	Time-				Amount		Proposed	Proposed	Proposed	Court
No.	Date	Keeper	Entry	Time	Rate		Objection Excessive rate; billed twice for same task;	Time	Rate	Total	Ruling
			Received 2nd email from opposing counsel regarding changes to proposed Joint				fee incurred after OOJ accepted; unnecessary time toward motion for				
172	10/8/2015	EHM	Motion	0.15	\$300.00	\$45.00	attorney's fees	0	\$0.00	\$0.00	\$0.0
							Excessive rate; fee				
							incurred after OOJ accepted;		,		
			Finalized Motion for Fees and				unnecessary time				
		7 4 5 8 8 8 8 8 8 8 8	Costs and obtained supporting				toward motion for				
171	10/14/2015	EHM	affidavits	1.6	\$300.00	\$480.00	attorney's fees	0	\$250.00	\$0.00	\$0.00
							Excessive rate; billed				
							twice for same task;				
	· · · · · · · · · · · · · · · · · · · ·						fee incurred after OOJ				
	•		Finalized Mating Son Francisco	•		•	accepted;	A CONTRACTOR	•		
			Finalized Motion for Fees and Costs and obtained supporting				unnecessary time toward motion for				
172	10/14/2015	EHM	affidavits	1.6	\$300.00	\$480.00	attorney's fees	0	\$0.00	\$0.00	\$0.0
172	10/14/2013			0,0	Ψ500.00	Ψ+00.00	Fee incurred after OOJ		, 4 0.00	, φο.,ου	Ψ0.0
							accepted;				
			Compiled and formatted Motion				unnecessary time			¥.	
			for Attorney Fees and Costs for				toward motion for				
171	10/15/2015	SPL	filing with the Court	1.5	\$95.00	\$142.50	attorney's fees	0	\$95.00	\$0.00	\$0.0
							Billed twice for same				
							task; fee incurred after				
							OOJ accepted;				
			Compiled and formatted Motion				unnecessary time toward motion for				
170	10/15/2015	CDI	for Attorney Fees and Costs for filing with the Court	1.5	\$95.00	¢142 E0	attorney's fees	0	\$95.00	\$0.00	\$0.0
172	10/13/2015	SPL	ming with the Court	C: §	Φ9 3.00	Φ14∠.50	allorney Silees		φ95.00	Φ0,00	Φ∪.∪0
			TOTALS	54.35		\$13,783.50		8.8		\$1,587.75	\$2.033.88