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8 *Attorneys for Plaintiffs/Class Representatives*

9 **UNITED STATES DISTRICT COURT**
10 **FOR THE EASTERN DISTRICT OF WASHINGTON**

11 RYAN DALEY, and individual, and)
12 ISAAK CURRY, an individual, each on)
behalf of himself and all others) Case No.: 2:18-cv-00381-SMJ
13 similarly situated,)
Plaintiffs,) **DECLARATION OF KIRK D.**
14 vs.) **MILLER IN SUPPORT OF**
GREYSTAR REAL ESTATE) **PLAINTIFFS' MOTION FOR**
15 PARTNERS, LLC, a Delaware limited) **AWARD OF ATTORNEYS' FEES,**
liability company; GREYSTAR) **COSTS AND SERVICE AWARD**
16 MANAGEMENT SERVICES, L.P., a)
Delaware corporation; GREYSTAR RS)
17 WEST, LLC, a Delaware limited)
liability company,)
18 Defendants.)
19)

1 Kirk D. Miller, under penalty of perjury of the laws of the United States,
2 declares the following:

- 3 1. I am one of the attorneys representing the Plaintiffs in this matter.
- 4 2. This Declaration is based on my personal knowledge.
- 5 3. I am a member in good standing admitted to practice by the bars of

6 the following courts:

7 Washington State Bar
Admitted: May 19, 2008

United States District Court
Eastern District of Washington
Spokane, Washington
Admitted: June 24, 2008

10 United States Court of
Appeals
for the 9th Circuit
San Francisco, California
Admitted: January 24, 2014

United States District Court
Western District of Washington
Admitted: April 1, 2013

13 United States Court of
Appeals
for the 6th Circuit
Cincinnati, Ohio
Admitted: April 9, 2015

16 4. I graduated from the Gonzaga School of Law, Spokane, Washington
17 in December 2007.

18 5. From 2008 to present, I am the principal with the firm Kirk D. Miller,
19 P.S. in Spokane, Washington.

1 6. Since 2008, I have actively litigated cases in Washington state and
2 federal courts, with most of my practice involving litigation of consumer rights and
3 consumer finance cases, primarily under the Washington Consumer Protection Act,
4 Fair Debt Collection Practices Act, debt collection defense, and Fair Credit
5 Reporting Act claims, debt collection defense, and claims arising under the
6 Washington Residential Landlord-Tenant statute.

7 7. The vast majority of my practice involves representing low-income
8 clients against businesses and corporations such as the Plaintiffs in this case.

9 8. I am experienced in complex litigation, including consumer class
10 action cases, prosecuted under various consumer protection statutes.

11 9. I have lectured to attorneys in the following legal education seminars
12 including but not limited to the following:

Gonzaga University Law School/ Spokane County Bar Association	CLE for Northwest Justice Project and other legal services sponsored by NCLC
<i>Training for Debt Defense CLE</i>	<i>FDCPA & Collection Defense</i>
"Defendant Debt Collection Lawsuits/ Assignment of Debt and Business Records Exception to Hearsay"	"Defendant Debt Collection Lawsuits/ Assignment of Debt and Business Records Exception to Hearsay" September 14-15, 2010 Seattle, Washington
February 18, 2011 Spokane, Washington	
Fairchild Air Force Base JAG training	CLE to NCLC Consumer Rights Debt Collection Defense Intensive
<i>Training for JAG officers on</i>	Conference Participants
<i>Consumer Law Issues</i>	<i>"Defense perspectives on Plaintiff's</i>
<i>"Debt Collection Defense"</i>	<i>Litigation Trends in Debt Collection</i>
October 21, 2011	<i>Defense"</i>
Fairchild AFB, Washington	October 6, 2011 Chicago, Illinois

1 CLE for the Yakima County Bar
2 Association
3 “Debt Collection Defense”
4 October 2012 Yakima, WA
5 Washington Consumer Law Task
6 Force – Annual Gathering and CLE
7 “Defenses to Debt Buyer Lawsuits”
8 September 12, 2014
9 Seattle, WA
10 2015 Access to Justice Conference
11 Issues in Washington Debt Buyer
12 Litigation
13 June 13, 2015 Wenatchee, WA

CLE for Benton/Franklin County Bar
Association and Legal Aid Society
“Debt Collection Defense”
March 22, 2013 Richland, WA
Northwest Consumer Law Center –
1st Annual Consumer Law Intensive
Cle “FDCPA and Debt Collection
Defense”
March 10, 2016 Seattle, WA
Featured presenter at the upcoming:
Northwest Consumer Law Center –
2nd Annual Consumer Law Intensive
Cle “Recovering Costs and Attorney’s
Fees Defending Debt Collection
Cases”
March 7, 2017 Seattle, WA

Northwest Justice Project
Garnishment 1.0 and 2.0;
Everything You’ve Ever Wanted to
Know About Garnishment
March 20, 2017 Seattle, WA

Washington Association for Justice
Consumer Protection CLE
Presenting on the FDCPA chapter
October 11, 2017

Yakima Bar Association CLE
Debt Defense and Attorney Fees
Yakima, WA
November 10, 2017

National Consumer Law Center
Consumer Rights Litigation
Conference
Post-Judgment Consumer Actions
Las Vegas, NV
November 2018

Spokane County Bar Association
Consumer Law CLE
Spokane, WA
November 2019

10. I am co-author of the Washington Association for Justice Consumer
Rights Deskbook FDCPA and Usury sections.

11. I have held an active role in establishing and maintaining the Spokane
Volunteer Lawyers Consumer Advocacy Program (CAP) and donate many pro-

1 bono hours each year to representing low-income individuals in Spokane County
2 Superior and District Courts.

3 12. Prior to the COVID-19 court shutdowns, I volunteered most Fridays
4 with the Spokane County Bar Association Volunteer Lawyers Consumer
5 Assistance Program, assisting and/or representing low-income individuals who
6 appear in court with consumer issues.

7 13. I have attended many local and national Continuing Legal Education
8 seminars on the topic of consumer rights, FDCPA, and debt collection defense,
9 including but not limited to: National Consumer Law Center (NCLC) trainings in
10 Washington, D.C. (2007, 2013, 2018); Chicago, IL; Seattle, WA; Philadelphia, PA,
11 San Antonio, TX, Jacksonville, FL, Tampa, FL, Anaheim, CA, and New Orleans,
12 LA (2017), Las Vegas, NV (2018), Boston, MA (2019).

13 14. I am a multi-year recipient of the Spokane County Bar Association
14 Consumer Advocate of the Year Award.

15 15. I have been an active member of the National Association of
16 Consumer Advocates (NACA) for more than 10 years.

17 16. I have served continuously since 2014 as the Washington State Chair
18 for the National Association of Consumer Advocates (NACA).

19 17. I am a member of the Spokane County Bar Association Volunteer
20 Lawyers Program Advisory Committee.

1 18. I previously served a six-year uncompensated term on the board of
2 directors for Family Promise Spokane, a non-profit organization that serves
3 homeless families in the Spokane community.

4 19. I am an AVVO 10-rated attorney.

5 20. I was named one of Spokane's top 100 attorneys from 2016 – present
6 in Spokane and Coeur d'Alene Living Magazine, in the categories of Bankruptcy
7 and Debt, and Litigation.

8 21. I previously served on the Washington State Bar Association Rules
9 Committee, as chairperson for the Evidence rules sub-committee.

10 22. I run a for-profit law firm but because my clients are typically low-
11 income, it is my practice to regularly accept a small or no retainer from my clients.
12 Most of my living is earned on a contingent-fee basis under statutory fee-shifting
13 provisions.

14 23. A reasonable hourly rate for my class action contingent fee cases is
15 \$525.00 per hour. Because my firm has limited staff and my firm is one of the
16 only area consumer rights-focused firms, allocation of resources to this case
17 prevented certain funds and personnel efforts from being directed to the
18 prosecution of others.

1 24. I am aware of aware of another attorney who litigates in this district
2 and charges his corporate client a non-contingent fee rate of \$745.00 per hour to
3 defend a class action. See USDC Case No. 2:19-cv-00390 TOR, ECF No. 21.

4 25. I have exercised billing discretion in this case and voluntarily reduced
5 both my own hours and those of my staff.

6 26. I prosecuted the claims at issue efficiently and effectively, making
7 every effort to prevent duplication of work and delegating tasks to co-counsel and
8 non-attorney staff whenever possible.

9 27. All the fees requested by my firm were reasonably incurred and
10 entirely contingent upon a successful outcome.

11 28. I own one of the only dedicated consumer-rights focused law firms in
12 the state of Washington that is willing to take on consumer cases such as the one at
13 bar.

14 29. Attached hereto as **Exhibit A** is a true and correct copy of my firm's
15 billing records prepared using our Time and Billing™ billing software. The
16 records were made at or near the time of the event by a person with knowledge of
17 the event (namely, Kirk D. Miller, co-counsel, or office staff). My firm normally
18 bills Paralegal support staff at \$150.00 per hour and \$90.00 per hour for legal
19 assistant time. I have investigated and am familiar with rates charged for paralegals
20

1 and legal assistants in this region and my firm's rate is at, or below the market rate
2 for such services.

3 SIGNED at Spokane, WA, this 27th day of August, 2021.

4 *s/ Kirk D. Miller*

5 KIRK D. MILLER, WSBA #40025

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CM/ECF CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of August, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Benjamin J Stone	<u>Benjamin.Stone@lewisbrisbois.com</u>
Brad Bigos	<u>Brad.Bigos@lewisbrisbois.com</u>
Kathryn Childers	<u>Kathryn.Childers@lewisbrisbois.com</u>
Michael A Jaeger	<u>Michael.Jaeger@lewisbrisbois.com</u>
Breanne F. Lynch	<u>Breanne.Lynch@lewisbrisbois.com</u>
<i>Attorneys for Defendants</i>	<u>cheryl.kelley@lewisbrisbois.com</u> <u>tami.foster@lewisbrisbois.com</u>
 Brian Cameron	 <u>bcameron@cameronsutherland.com</u>
<i>Attorney for Plaintiffs</i>	<u>tbracken@cameronsutherland.com</u>
 Kirk D Miller	 <u>kmiller@millerlawspokane.com</u>
<i>Attorney for Plaintiffs</i>	<u>tbracken@cameronsutherland.com</u>

s/ Teri A. Bracken
Paralegal

EXHIBIT A

*Declaration of Kirk D. Miller in Support of
Plaintiffs' Motion for Award of Attorneys' Fees,
Costs, and Service Award
Daley/Curry v. Greystar
2:18-CV-0381 SMJ*

KIRK D MILLER PS
421 W Riverside Ave
Suite 660
Spokane, WA 99201
kmiller@millerlawspokane.com

INVOICE

To August 28, 2021

Invoice Date August 27, 2021

Invoice Number 60

Account Summary	
Previous Balance	\$0.00
Payments Received	\$0.00
Outstanding Balance	\$0.00
Current Invoice	\$215,645.55
Total Due	\$215,645.55

Daley Curry v. Greystar

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Fee Detail

Date		Description	Hours	Rate	Total
3/18/2018	BGC	Rvw./annotate DFs M/Dismiss re: lack of personal Jurisdiction; investigate business profiles/activities; compile exhibits; internal memo	4.00	\$425.00/hr	\$1,700.00
3/19/2018	BGC	Rsch. RCW .257 re: tenants' rights/interests in credit reporting, e.g., Handlin v On-Site, etc.; RCW 19.86; State v. Schwab preclusions	2.60	\$425.00/hr	\$1,105.00
4/1/2018	BGC	DR1 PFs 2d Amended Compl.	0.70	\$425.00/hr	\$297.50
4/15/2018	BGC	Rvw./annotate DFs Response to PFs M/ Amend Compl.; rsch. FRCP, DFs case authorities; internal memo	3.00	\$425.00/hr	\$1,275.00
4/25/2018	BGC	Prep./attend Scheduling CONF	0.30	\$425.00/hr	\$127.50
5/13/2018	BGC	DR1 PFs 1st ROGs/RFPs	2.50	\$425.00/hr	\$1,062.50
5/14/2018	BGC	Rvw./verify DFs M/Dismiss; rsch. DFs case authorities; internal memo	2.70	\$425.00/hr	\$1,147.50
5/14/2018	BGC	DR2 ROGs/RFPs	1.50	\$425.00/hr	\$637.50
5/17/2018	BGC	Rsch./investigate PF's response to DF's M/Dismiss re: GREP corporate structure, associations, WA involvement; compile exhibits;	6.20	\$425.00/hr	\$2,635.00
5/28/2018	BGC	Rvw./revise PFs 1st ROGS, RFPs	0.80	\$425.00/hr	\$340.00
5/31/2018	BGC	DR1 PFs response to DFs 2d Motion to Dismiss re: Personal Jurisdiction	5.50	\$425.00/hr	\$2,337.50
6/3/2018	BGC	DR1 PFs response to DFs 2d Motion to Dismiss re: Personal Jurisdiction	3.70	\$425.00/hr	\$1,572.50
6/4/2018	BGC	DR2 PFs response to DFs 2d Motion to Dismiss re: Personal Jurisdiction; Declarations; Exhibits	2.10	\$425.00/hr	\$892.50
6/19/2018	BGC	Rvw./verify DFs Reply ISO DFs 2d Motion to Dismiss re: Personal Jurisdiction	0.70	\$425.00/hr	\$297.50
7/29/2018	BGC	Rvw./analyze DFs responses to PFs 1st ROGs/ RFPs; verify objections; CONF CC	1.90	\$425.00/hr	\$807.50
8/20/2018	BGC	Rvw./verify DF GManagement's M/SJ Facts	0.90	\$425.00/hr	\$382.50
8/20/2018	BGC	Rvw./verify DF GREP's M/SJ Facts	1.10	\$425.00/hr	\$467.50

Daley Curry v. Greystar

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Date		Description	Hours	Rate	Total
8/20/2018	BGC	Rvw./verify DF GManagement's M/SJ Facts	1.40	\$425.00/hr	\$595.00
8/22/2018	BGC	Rsch. Rule 23 standards, RCW 59.18.257; facts/evidence; outline M/Class Cert.	2.30	\$425.00/hr	\$977.50
8/23/2018	BGC	Rvw./edit M/Class Cert	1.90	\$425.00/hr	\$807.50
8/23/2018	BGC	Rvw./edit M/Class Cert	0.90	\$425.00/hr	\$382.50
8/26/2018	BGC	DR1 PFs M/Class Cert.	5.40	\$425.00/hr	\$2,295.00
8/27/2018	BGC	CONF CLT re: class representation; damages	0.90	\$425.00/hr	\$382.50
8/29/2018	BGC	CONF CLT re: RCW 59.18 retaliation, early termination, damages and expenses, litigation strategy	1.90	\$425.00/hr	\$807.50
9/5/2018	BGC	Rsch. RCW 59.18.257, RCW 59.19.030, case law; rvw. case file, pleadings, evidence; outline PFs Response	4.50	\$425.00/hr	\$1,912.50
9/6/2018	BGC	DR1 PFs Response DFs M-SJ	4.10	\$425.00/hr	\$1,742.50
9/18/2018	BGC	DR2 PFs Response DFs M-SJ; Decls.	1.90	\$425.00/hr	\$807.50
11/2/2018	KDM	meeting with clients to discuss claims/causes, class action responsibilities, etc. Research RLTA ss .257 statute and case law. Consulting	4.30	\$525.00/hr	\$2,257.50
11/5/2018	BGC	MTG with CLT to discuss individual/class claims; litigations scope, roles, responsibilities; case strategy Client Meeting	1.20	\$425.00/hr	\$510.00
11/5/2018	KDM	client meeting to discuss retainer agreement and next steps. Client Meeting	1.20	\$525.00/hr	\$630.00
11/15/2018	KDM	Begin drafting complaint - class action	6.20	\$525.00/hr	\$3,255.00
11/21/2018	KDM	Finish first draft of Complaint - class action and send to Shayne Sutherland and Brian Cameron for review.	3.20	\$525.00/hr	\$1,680.00
12/6/2018	BGC	CONF CC re: class action Complaint; revisions per CLT Curry Meeting - other	0.80	\$425.00/hr	\$340.00
12/6/2018	KDM	Discussion with Brian Cameron re complaint. Edits re same.	1.80	\$525.00/hr	\$945.00

Daley Curry v. Greystar

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Date		Description	Hours	Rate	Total
12/10/2018	BGC	Rsch. RCW 59.18.257; DR1 Compl.	2.80	\$425.00/hr	\$1,190.00
12/10/2018	BGC	DR2 Compl.	1.50	\$425.00/hr	\$637.50
12/10/2018	BGC	CONF CC re: final edits to COMPL Draft/Revise	0.60	\$425.00/hr	\$255.00
12/10/2018	KDM	Discussion with Brian Cameron re final edits. Conference with staff re finalizing and prep for filing.	0.60	\$525.00/hr	\$315.00
12/11/2018	KDM	Final edits/review. Prep and file Summons/ Complaint.	0.40	\$525.00/hr	\$210.00
12/12/2018	KDM	receive summons/judge assignment. email sent/received to prior Greystar counsel - Jaime Drozd Allen - re accepting service. Prior counsel cannot accept. Discussion with RE re serving S/C.	0.80	\$525.00/hr	\$420.00
1/8/2019	KDM	Email from Jaime Allen re extension of time to respond. Discussion with Brian Cameron and Shayne Sutherland re same. Do not agree to extension based on prior bad acts by Defendant. Correspondence	0.50	\$525.00/hr	\$262.50
1/9/2019	KDM	voicemail from OC Stone and response re extending time for defendant to answer	0.30	\$550.00/hr	\$165.00
1/9/2019	KDM	Review appearance from attorney Benjamin Stone. Brief research on OC litigation history.	0.70	\$525.00/hr	\$367.50
1/20/2019	BGC	CONF co-counsel re: Greystar entities, operations, media releases/coverages, property management activities, acquisitions, etc. Compile facts re: Amended COMPL. Draft summary memo. Research	4.60	\$425.00/hr	\$1,955.00
1/20/2019	KDM	Discussion w/ Brian Cameron and Shayne Sutherland re proper parties. Begin research on proper Greystar entities. Begin drafting first amended complaint.	3.90	\$525.00/hr	\$2,047.50
1/20/2019	SJS	Conf: With CC disc. strategy and proper parties	6.00	\$425.00/hr	\$2,550.00
1/22/2019	BGC	CONF CC re: DFs position re: claims	0.20	\$425.00/hr	\$85.00
1/22/2019	KDM	phone call with OC and follow-up debrief w/ Brian Cameron after.	0.40	\$525.00/hr	\$210.00

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Date		Description	Hours	Rate	Total
1/22/2019	KDM	First draft of Interrogatories and RFPs to Greystar	4.10	\$525.00/hr	\$2,152.50
1/23/2019	KDM	exhaustive internet search for corporate information on the relationship between the greystar entities w/screenshots.	3.80	\$525.00/hr	\$1,995.00
1/24/2019	KDM	Review final draft of 1st amended complaint and conference with Brian Cameron re same. Directions for filing.	1.70	\$525.00/hr	\$892.50
1/26/2019	KDM	Review email correspondence from yesterday re: acceptance and waiver of service of summons.	0.20	\$525.00/hr	\$105.00
2/7/2019	KDM	review and color-code answer from GMS received today.	1.00	\$525.00/hr	\$525.00
2/7/2019	KDM	review corporate disclosure statement.	0.10	\$525.00/hr	\$52.50
2/20/2019	KDM	Review NOA and corporate disclosures by added Greystar entities.	0.20	\$525.00/hr	\$105.00
2/22/2019	KDM	Review answer and affirmative defenses from GREP.	0.80	\$525.00/hr	\$420.00
3/5/2019	KDM	Review scheduling conference notice.	0.10	\$525.00/hr	\$52.50
3/6/2019	KDM	Review email from Taliah Ahdut, counsel for Greystar.	0.10	\$525.00/hr	\$52.50
3/7/2019	KDM	Review notice from court re: initial disclosures and follow up with staff re contents.	0.30	\$525.00/hr	\$157.50
3/8/2019	KDM	review motion for extension of time to answer and corresponding declaration. Discussion with Shayne Sutherland and Brian Cameron re same	0.50	\$525.00/hr	\$262.50
3/9/2019	KDM	intial read-thru of Greystar (GREP) MTD. review substantive cases cited by Ds, including Schwarzenegger, Wash. Shoe, and Williams.	2.60	\$525.00/hr	\$1,365.00
3/9/2019	KDM	review declaration in support of MTD by GREP. Compare against previously captured screen-shots and information re: relationship of Greystar entities.	1.40	\$525.00/hr	\$735.00

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Date		Description	Hours	Rate	Total
3/11/2019	BGC	Rvw./annotate DFs M/Dismiss re: lack of personal Jurisdiction; investigate business profiles/activities; compile exhibits; internal memo	4.00	\$425.00/hr	\$1,700.00
3/11/2019	KDM	review order granting extension of time to answer.	0.10	\$525.00/hr	\$52.50
3/18/2019	BGC	DR1 PFs response DFs M/Dismiss re: Personal Jurisdiction	6.10	\$425.00/hr	\$2,592.50
3/23/2019	KDM	Further online research of Greystar entity websites. Looks like shell game designed to avoid liability for certain entities.	1.80	\$525.00/hr	\$945.00
3/27/2019	KDM	internet research on greystar worldwide and transition of trademark from GREP to worldwide.	2.50	\$525.00/hr	\$1,312.50
3/27/2019	KDM	Draft/assemble declaration authenticating online research, etc.	0.70	\$525.00/hr	\$367.50
3/28/2019	BGC	CON co-counsel re: case posture, status, additional facts Review	0.50	\$425.00/hr	\$212.50
3/28/2019	KDM	Draft Response to MTD w/accompanying legal research.	4.20	\$525.00/hr	\$2,205.00
3/28/2019	KDM	Conference w/ Shayne Sutherland and Brian Cameron re amending complaint.	0.50	\$525.00/hr	\$262.50
3/28/2019	SJS	Conf: With CC re strategy and amendment	0.50	\$425.00/hr	\$212.50
3/29/2019	KDM	Final edits to Kirk Miller Declaration and instructions for filing.	0.50	\$525.00/hr	\$262.50
3/29/2019	KDM	discussion w/paras re instructions for compiling and filing docs - response to MTD and declaration	0.30	\$525.00/hr	\$157.50
3/29/2019	KDM	email from OC re scheduling conference.	0.10	\$525.00/hr	\$52.50
3/29/2019	KDM	Finish drafting response to MTD.	5.10	\$525.00/hr	\$2,677.50
3/29/2019	KDM	draft motion for leave to file 2nd amended complaint and final edits to the proposed amended complaint.	1.40	\$525.00/hr	\$735.00
4/1/2019	KDM	draft/prep intial disclosures and proposed joint cert to send to OC for review.	1.60	\$525.00/hr	\$840.00

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Date		Description	Hours	Rate	Total
4/9/2019	BGC	CONF co-counsel re: online evidence compilation/preservation; CONF plgls. re: process	0.80	\$425.00/hr	\$340.00
4/9/2019	KDM	email with OC regarding joint cert status, edit and email same for his review.	0.30	\$525.00/hr	\$157.50
4/9/2019	KDM	Meeting with Brian Cameron re capture of individual Greystar property website disclosures and instructions to staff on the same.	0.80	\$525.00/hr	\$420.00
4/11/2019	KDM	email from court re schedule change.	0.10	\$525.00/hr	\$52.50
4/11/2019	KDM	review initial disclosures received from defendant and notice of compliance. discussion re same with Brian Cameron.	0.30	\$525.00/hr	\$157.50
4/11/2019	KDM	Email rcv'd from OC re joint cert. review changes. discussion with staff and Brian Cameron re same. response email to OC.	0.40	\$525.00/hr	\$210.00
4/11/2019	KDM	draft/send initial disclosures and notice of compliance.	0.50	\$525.00/hr	\$262.50
4/12/2019	KDM	review reply memo opposing leave to file second amended complaint. review substantive cited cases cited by defendants. Lockheed Martin, Kramer Motors, Bonin.	2.80	\$525.00/hr	\$1,470.00
4/13/2019	KDM	Review/analyze D's reply in support of MTD. Discussion with Brian Cameron and Shayne Sutherland re same.	0.90	\$525.00/hr	\$472.50
4/17/2019	KDM	draft/edit reply in support of motion for leave to file 2nd amended complaint.	1.60	\$525.00/hr	\$840.00
4/25/2019	KDM	prep and attend telephonic scheduling conference.	0.30	\$525.00/hr	\$157.50
4/25/2019	KDM	draft/edit additional rogs and rfps.	3.90	\$525.00/hr	\$2,047.50
4/29/2019	BGC	CONF co-counsel re: scheduling order, discovery timelines, motion setting	0.40	\$425.00/hr	\$170.00
4/29/2019	KDM	review scheduling order and discussion with Brian Cameron and Shayne Sutherland re same.	0.40	\$525.00/hr	\$210.00
4/29/2019	SJS	Conf: with CC conc. case strategy	0.40	\$425.00/hr	\$170.00

Daley Curry v. Greystar

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Date		Description	Hours	Rate	Total
4/30/2019	BGC	Rvw./annotate Orders granting leave to Amend, etc.	0.60	\$425.00/hr	\$255.00
4/30/2019	KDM	review order granting amend complaint and denying D's MTD. Discussion with Shayne Sutherland and Brian Cameron re same.	0.80	\$525.00/hr	\$420.00
4/30/2019	KDM	final review of discovery - rogs/rfps to greystar entities.	0.60	\$525.00/hr	\$315.00
5/3/2019	KDM	review 2nd amended complaint and instructions for filing.	0.40	\$525.00/hr	\$210.00
5/3/2019	SJS	Drft: Discovery	2.10	\$425.00/hr	\$892.50
5/14/2019	KDM	review D's 2nd MTD. discussion with Shayne Sutherland and Brian Cameron re same.	2.30	\$525.00/hr	\$1,207.50
5/14/2019	SJS	Conf: with CC re: motion to dismiss and response	0.60	\$425.00/hr	\$255.00
5/15/2019	KDM	Review substantive cases cited in D's 2nd MTD.	3.20	\$525.00/hr	\$1,680.00
5/21/2019	SJS	Drft: Edits to Discovery	1.00	\$425.00/hr	\$425.00
6/2/2019	KDM	Draft response to 2nd MTD. Send to Brian Cameron and Shayne Sutherland for edits.	2.80	\$525.00/hr	\$1,470.00
6/2/2019	SJS	Drft: edits to response MTD	1.10	\$425.00/hr	\$467.50
6/3/2019	KDM	Discussion with Brian Cameron and review his declaration/exhibits for content and applicability to response to MTD.	1.40	\$525.00/hr	\$735.00
6/5/2019	KDM	review order denying oral argument. discussion with Brian Cameron re same.	0.20	\$525.00/hr	\$105.00
6/18/2019	KDM	review reply to MTD and supporting declaration/exhibits. Discussion with Brian Cameron and Shayne Sutherland re same.	1.90	\$525.00/hr	\$997.50
6/19/2019	KDM	email from OC re extending discovery response time. discussion with Shayne Sutherland and BGC re same and response to email.	0.60	\$525.00/hr	\$315.00
6/19/2019	SJS	Conf: with CC re discovery responses	0.40	\$425.00/hr	\$170.00
6/20/2019	KDM	receive/send email re discovery extension.	0.20	\$525.00/hr	\$105.00
7/24/2019	KDM	review notice of unavailability of D's counsel	0.10	\$525.00/hr	\$52.50

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Date		Description	Hours	Rate	Total
7/25/2019	KDM	review order denying GREP MTD and discussion re next steps w/ Shayne Sutherland and Brian Cameron.	1.90	\$525.00/hr	\$997.50
7/29/2019	KDM	review/mark-up defendants initial responses to discovery and objections.	2.30	\$525.00/hr	\$1,207.50
7/30/2019	BGC	CONF co-counsel re: discovery review, objections, exhibits	0.90	\$425.00/hr	\$382.50
7/30/2019	KDM	Conference w/ Shayne Sutherland and BCG re discovery responses - mostly objections and next steps.	0.70	\$525.00/hr	\$367.50
7/30/2019	SJS	Conf: w/ CC re discovery	0.90	\$425.00/hr	\$382.50
8/9/2019	KDM	review/mark-up Greystar's Answer to 2nd amended complaint. 3 separate answers - one from each Greystar entity.	2.40	\$525.00/hr	\$1,260.00
8/12/2019	KDM	initial read-thru and analysis of Defendant's MSJ an Prince declaration.	0.90	\$525.00/hr	\$472.50
8/12/2019	KDM	Internet research re: allegations/denials asserted in new amended answers. researching for online statements by various greystar entities.	1.70	\$525.00/hr	\$892.50
8/13/2019	BGC	CONF co-counsel re: case strategy	0.60	\$425.00/hr	\$255.00
8/13/2019	KDM	Conference w/SJS and Brian Cameron re MSJ and next steps for response.	0.60	\$525.00/hr	\$315.00
8/13/2019	SJS	Conf: with CC re strategy going forward	0.60	\$425.00/hr	\$255.00
8/15/2019	KDM	Review Defendant's statement of undisputed facts and attached exhibits/documents.	1.90	\$525.00/hr	\$997.50
8/16/2019	KDM	review corporate disclosure statement filed by GREP.	0.10	\$525.00/hr	\$52.50
8/19/2019	KDM	search correspondence and pleadings from Fleming v Greystar for statements/admissions regarding the relationship of the Greystar entities - which seems to be a large part of the defense. Conference with Shayne Sutherland same.	1.30	\$525.00/hr	\$682.50
8/21/2019	KDM	Review GREP MSJ and 81 pg statement of material facts w/attachments.	2.80	\$525.00/hr	\$1,470.00

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Date		Description	Hours	Rate	Total
8/22/2019	KDM	conference w/ Brian Cameron re recent online statements by Greystar and next steps for response to MSJ.	0.60	\$525.00/hr	\$315.00
8/23/2019	KDM	Draft initial response to MSJ.	5.10	\$525.00/hr	\$2,677.50
8/25/2019	KDM	Start first draft of motion for class cert.w/ associated research.	2.40	\$525.00/hr	\$1,260.00
8/26/2019	BGC	CONF co-counsel re: class certification motion, authorities, factor application; final edits	1.30	\$425.00/hr	\$552.50
8/26/2019	KDM	Draft/edit MSJ response and discussion w/ Brian Cameron re same. Draft Kirk Miller declaration. Final edits and directions for formatting/filing.	2.60	\$525.00/hr	\$1,365.00
8/26/2019	KDM	Finish 1st draft of Motion for class cert and brief discussion w/ Shayne Sutherland re same.	1.30	\$525.00/hr	\$682.50
8/26/2019	KDM	Research recent case law - focused on 9th circuit - re class action certification standards.	2.60	\$525.00/hr	\$1,365.00
8/26/2019	SJS	Drft: Edits to Class Cert Motion and conf. with CC conc. motion	1.60	\$425.00/hr	\$680.00
8/27/2019	KDM	final work on motion for class cert. draft declaration in support. conference w/ Brian Cameron and Shayne Sutherland re content. Give directions on formatting and final review of documents prior to filing.	4.30	\$525.00/hr	\$2,257.50
8/27/2019	SJS	Drft: edits to declaration in support of class cert	0.40	\$425.00/hr	\$170.00
8/28/2019	KDM	Research judicial estoppel - applicable to Greystar's prior statements to the court. Reviewed Sullivan v. Washington and Maclean Townhomes v. Charter.	1.30	\$525.00/hr	\$682.50
8/30/2019	BGC	CONF co-counsel re: case strategy/timelines: M/Continue: FRCP 56(d)	0.80	\$425.00/hr	\$340.00
8/30/2019	KDM	Discussion w/ Brian Cameron and Shayne Sutherland re converting response to motion to continue for more discovery. Research FRCP 56(d). final edits to response to MSJ/ continue and directions for filing.	1.40	\$525.00/hr	\$735.00

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Date		Description	Hours	Rate	Total
8/30/2019	KDM	Finish first draft of response to MSJ and forward to Brian Cameron for review/edits.	1.00	\$525.00/hr	\$525.00
8/30/2019	KDM	Conference w/ Brian Cameron re format and combining responses to both MSJs.	0.30	\$525.00/hr	\$157.50
8/30/2019	SJS	Drft: rvw and edit continuance brief; Conf: with CC conc. continuance	0.80	\$425.00/hr	\$340.00
9/3/2019	KDM	westlaw search for other cases filed against Greystar entities.	0.70	\$525.00/hr	\$367.50
9/4/2019	KDM	Draft/edit statement of fact.	0.80	\$525.00/hr	\$420.00
9/5/2019	BGC	CONF co-counsel and plgls. re: auhtorities, citations	0.20	\$425.00/hr	\$85.00
9/5/2019	KDM	Conference w/ Brian Cameron and para re ECF citation and filing precipe.	0.20	\$525.00/hr	\$105.00
9/6/2019	KDM	review notice re-setting hearing on MSJ.	0.10	\$525.00/hr	\$52.50
9/10/2019	BGC	DR1 Declaration; CONF co-counsel re: peer review/revisions	0.90	\$425.00/hr	\$382.50
9/10/2019	KDM	Review/edit response to GREP MSJ rev'd from Brian Cameron.	0.80	\$525.00/hr	\$420.00
9/10/2019	KDM	Review/edit statement of fact for GREP MSJ response.	0.50	\$525.00/hr	\$262.50
9/10/2019	KDM	Conference w/ Brian Cameron re his declaration and review/final edits to same.	0.20	\$525.00/hr	\$105.00
9/12/2019	KDM	initial review of Defendants' response to Motion for class cert.	0.70	\$525.00/hr	\$367.50
9/14/2019	KDM	review D's response to motion to continue. review cited authority - Revitalization Partners, Tatum, Joseph, Black v. Hansen	2.90	\$525.00/hr	\$1,522.50
9/17/2019	BGC	Rvw./revise/edit Reply re: Motion for Class Cert; CONF co-counsel	1.40	\$425.00/hr	\$595.00
9/17/2019	KDM	First draft of reply in support of class cert. forward for editing from staff and Brian Cameron and Shayne Sutherland.	2.30	\$525.00/hr	\$1,207.50
9/18/2019	BGC	Rsch. FRCP 16; DR1 M/Stay and Continue Scheduling Order	0.50	\$425.00/hr	\$212.50

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Date		Description	Hours	Rate	Total
9/18/2019	BGC	Rvw./verify DFs Surreply re: DFs M/Class Cert.	0.50	\$425.00/hr	\$212.50
9/18/2019	KDM	final edits and instructions for filing reply to motion for class cert.	0.50	\$525.00/hr	\$262.50
9/19/2019	BGC	CONF co-counsel re: PFs Reply to DFs M/Summary Judgment; rsch. verify cases, opposing authorities	1.70	\$425.00/hr	\$722.50
9/19/2019	BGC	DR1 PFs Reply ISO M/Class Cert.	1.70	\$425.00/hr	\$722.50
9/19/2019	KDM	Draft motion/declaration to extend time to file reply by 1 day.	1.00	\$525.00/hr	\$525.00
9/19/2019	KDM	final edits to motion to extend time and directions for filing.	0.30	\$525.00/hr	\$157.50
9/19/2019	KDM	Draft Reply to D's MSJ Motion. Discussion with Brian Cameron re same.	3.10	\$525.00/hr	\$1,627.50
9/19/2019	KDM	review notice of intent to file sur-reply. discussion with Shayne Sutherland and Brian Cameron and staff re deadline to file reply. Email to/from OC Ben Stone rejecting request for one-day extension to file.	0.60	\$525.00/hr	\$315.00
9/19/2019	SJS	Conf: re deadlines Reply	0.20	\$425.00/hr	\$85.00
9/20/2019	KDM	review motion to strike/sur reply and discussion re same w/ Brian Cameron and Shayne Sutherland.	0.70	\$525.00/hr	\$367.50
9/25/2019	KDM	Review reply memo in support of D's MSJ and discussion w/ Brian Cameron re same.	0.90	\$525.00/hr	\$472.50
9/26/2019	KDM	review court notice setting hearing w/out oral argument for MSJs	0.10	\$525.00/hr	\$52.50
10/3/2019	KDM	Review response to motion for extension of time. Discussion re next steps w/ Brian Cameron.	0.90	\$525.00/hr	\$472.50
10/29/2019	BGC	CONF co-counsel, plgls. re: expert witnesses	0.40	\$425.00/hr	\$170.00
10/29/2019	KDM	Conference w/ Brian Cameron and Teri Bracken re necessity of experts for this case.	0.40	\$525.00/hr	\$210.00

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Date		Description	Hours	Rate	Total
1/21/2020	KDM	Conference w/ Shayne Sutherland and Teri Bracken re extending discovery cutoff. Class cert motion has been pending for several months. Teri Bracken to contact court for an update.	0.30	\$525.00/hr	\$157.50
1/21/2020	SJS	Conf: with Kirk Miller and Teri Bracken re cutoff extension	0.30	\$425.00/hr	\$127.50
1/21/2020	TB	Conference with attorneys Re: Discovery Cutoff extension	0.30	\$150.00/hr	\$45.00
1/30/2020	BGC	Rsch. FRCP 16; DRI M/Stay and Continue Scheduling Order	0.70	\$400.00/hr	\$280.00
1/30/2020	KDM	review/edit motion to stay scheduling order while class cert motion pending. Conference with Brian Cameron re same.	0.40	\$525.00/hr	\$210.00
1/31/2020	BGC	CONF co-counsel re: case status, timelines, M/Stay	0.50	\$425.00/hr	\$212.50
1/31/2020	KDM	Conference w/ Brian Cameron re moving to stay. Review/edit final draft of notice for filing.	0.50	\$525.00/hr	\$262.50
1/31/2020	KDM	review D's notice of to-be-adjudicated claims and discussion with Brian Cameron re same.	0.60	\$525.00/hr	\$315.00
2/13/2020	KDM	review opposition to continue and supporting declaration. discussion with Brian Cameron and Shayne Sutherland re same.	0.70	\$525.00/hr	\$367.50
2/25/2020	BGC	CONF co-counsel re: case status, class administration issues, options for resolution	1.00	\$425.00/hr	\$425.00
2/25/2020	KDM	strategic planning w/ Shayne Sutherland and Brian Cameron re case status and next steps since no ruling on pending motions for 4 months.	1.00	\$525.00/hr	\$525.00
2/25/2020	SJS	Conf: with CC conc. action steps for resolution	1.00	\$425.00/hr	\$425.00
2/28/2020	KDM	review text order from court and brief discussion with staff/ Brian Cameron re same.	0.50	\$525.00/hr	\$262.50
3/31/2020	KDM	review email from OC re settlement/mediation on individual basis only. Discussion with Shayne Sutherland re same.	0.40	\$525.00/hr	\$210.00

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Date		Description	Hours	Rate	Total
4/1/2020	BGC	CONF co-counsel, plgs. re: magistrate procedures, report and recommendations, etc.	0.50	\$425.00/hr	\$212.50
4/1/2020	KDM	Conference w/staff and Brian Cameron re deadlines and what Magistrate Dimke expects.	0.50	\$425.00/hr	\$212.50
4/6/2020	BGC	Prep./present CONF call w/co-counsel, opposing counsel re: settlement issues	0.70	\$425.00/hr	\$297.50
4/6/2020	KDM	Correspondence w/ Brian Cameron and OC re settlement possibilities.	0.40	\$425.00/hr	\$170.00
4/20/2020	KDM	review text order and brief conference with Brian Cameron re same.	0.40	\$525.00/hr	\$210.00
5/22/2020	KDM	review text order re vacating deadlines, discussion w/staff re same.	0.20	\$525.00/hr	\$105.00
6/3/2020	KDM	Conference w/ Teri Bracken re follow-up on deadlines w/ Magistrate Dimke, correspondence re same.	0.20	\$525.00/hr	\$105.00
6/10/2020	KDM	review correspondence from Mag. Dimke's chambers re scheduling.	0.10	\$525.00/hr	\$52.50
7/2/2020	BGC	Rvw./verify Order on parties' respective motions (48 pgs.)	0.80	\$425.00/hr	\$340.00
7/2/2020	KDM	Review 48 page order from Magistrate Dimke recommending class cert.	3.10	\$525.00/hr	\$1,627.50
7/16/2020	KDM	review/mark-up D's objection to report. Conference w/BGC and Shayne Sutherland re same.	2.40	\$525.00/hr	\$1,260.00
7/16/2020	SJS	Conf: with CC conc. Df.'s objection to report and response	0.60	\$425.00/hr	\$255.00
7/20/2020	SJS	Rvw: order and findings from Dimke; Disc. with office conc. outcome	1.60	\$425.00/hr	\$680.00
7/23/2020	BGC	Rvw./analyze, annotate Magistrate's Report and Recommendations; rsch. case law re: authority, findings, conclusions; outline/draft PFs response to DFs objections	5.20	\$425.00/hr	\$2,210.00
7/24/2020	BGC	DR1 PFs Response to DFs Objections to Magistrates Report and Recommendations	3.60	\$425.00/hr	\$1,530.00
7/25/2020	BGC	DR1 DFs Response to DFs Objections to magistrates report and recommendations	2.30	\$425.00/hr	\$977.50

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Date		Description	Hours	Rate	Total
7/30/2020	KDM	Review/edit response to Defendants' objections to magistrate ruling.	1.90	\$525.00/hr	\$997.50
8/13/2020	KDM	review ruling adopting magistrate recommendation on class cert and MSJs.	1.40	\$525.00/hr	\$735.00
8/19/2020	BGC	Rvw./verify Order re: DFs Objections; CONF litigation team re: PFs response	0.70	\$425.00/hr	\$297.50
8/19/2020	KDM	phone call with Ben Stone re status report and deadline disagreement.	0.20	\$525.00/hr	\$105.00
8/20/2020	BGC	DR1 Draft response to DFs disputed JSR response re: Scheduling Order; CONF co-counsel	1.90	\$425.00/hr	\$807.50
8/20/2020	KDM	review proposed joint cert and conference w/ Brian Cameron re their objection to extending deadline. correspondence with OC and notice from the court.	1.60	\$525.00/hr	\$840.00
8/28/2020	SJS	Rvw: Decision of the Court	0.20	\$425.00/hr	\$85.00
8/31/2020	BGC	Rvw. CSO, trial setting	0.20	\$425.00/hr	\$85.00
8/31/2020	KDM	review new scheduling order and conference re same w/ Teri Bracken.	0.20	\$525.00/hr	\$105.00
9/3/2020	KDM	Phone call w/Ben Stone re discovery/ mediation.	0.20	\$525.00/hr	\$105.00
9/10/2020	KDM	email to Ben Stone re mediation	0.30	\$525.00/hr	\$157.50
9/10/2020	TB	Docket Class Action Scheduling Order	1.50	\$150.00/hr	\$225.00
9/17/2020	KDM	email to OC re mediation	0.20	\$525.00/hr	\$105.00
9/18/2020	KDM	email to/from OC re mediation and scheduling.	0.20	\$425.00/hr	\$85.00
9/21/2020	KDM	Correspondence w/OC and co-counsel re proposed order vacating deadlines.	0.30	\$425.00/hr	\$127.50
9/22/2020	KDM	review filed motion for stay pending mediation.	0.10	\$525.00/hr	\$52.50
9/23/2020	BGC	CONF co-counsel re: text Order, litigation status	0.30	\$425.00/hr	\$127.50
9/23/2020	KDM	review text order from court and discussion with Brian Cameron and Shayne Sutherland re same.	0.30	\$525.00/hr	\$157.50

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Date		Description	Hours	Rate	Total
9/23/2020	SJS	Conf: with CC re case	0.30	\$425.00/hr	\$127.50
9/23/2020	TB	Telephone Conference w/Client Daley	0.20	\$150.00/hr	\$30.00
10/6/2020	BGC	CONF CC re: LTR from mediator re: prospective settlement	0.50	\$425.00/hr	\$212.50
10/6/2020	KDM	review letter from mediator Lou Peterson and brief discussion re same w/ Brian Cameron.	0.50	\$525.00/hr	\$262.50
10/7/2020	KDM	email from OC re Defendants paying for mediation. Conference w/ Brian Cameron re same.	0.20	\$525.00/hr	\$105.00
10/20/2020	KDM	telephonic meeting w/Lou Peterson and co-counsel/OC. conference with Shayne Sutherland re same.	1.00	\$525.00/hr	\$525.00
10/20/2020	SJS	Conf: With Lou Peterson conc. Mediation expectations (0.4); with CC disc. mediation strategy (0.6)	1.00	\$425.00/hr	\$425.00
11/3/2020	BGC	DRI PFs Mediation Statement	2.00	\$425.00/hr	\$850.00
11/3/2020	KDM	review report and statistical data for Greystar in WA as basis for estimating total class members - report prepared by Ewan Cameron	1.80	\$525.00/hr	\$945.00
11/5/2020	KDM	review Defendant's multi-part mediation statement with exhibits.	2.40	\$525.00/hr	\$1,260.00
11/5/2020	KDM	review/edit open mediation statement and discussion with Shayne Sutherland re same.	2.10	\$525.00/hr	\$1,102.50
11/5/2020	SJS	Rvw: Dfs' mediation materials	0.80	\$425.00/hr	\$340.00
11/5/2020	SJS	Drft: edits to mediation LTR (0.6); Conf: with CC disc. strategy (0.5)	1.10	\$425.00/hr	\$467.50
11/6/2020	BGC	Rvw./verify DFs Mediation Statement; rsch. RCW 59.18, et seq.	1.00	\$425.00/hr	\$425.00
11/6/2020	KDM	Discuss mediation strategy and data w/ Shayne Sutherland.	0.60	\$525.00/hr	\$315.00
11/6/2020	KDM	draft joint status report and conference w/TB re same.	0.40	\$525.00/hr	\$210.00
11/6/2020	SJS	Conf: with CC discussing mediation facts and strategy	0.60	\$425.00/hr	\$255.00
11/8/2020	KDM	preparation for mediation	2.00	\$525.00/hr	\$1,050.00

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Date		Description	Hours	Rate	Total
11/8/2020	SJS	Assist CC with mediation prep	0.90	\$425.00/hr	\$382.50
11/8/2020	TB	Prepare for Mediation	2.50	\$150.00/hr	\$375.00
11/9/2020	BGC	Prep./participate mediation	9.10	\$425.00/hr	\$3,867.50
11/9/2020	KDM	Participation in mediation - whole day - with periodic communications with client for updates and offers. no settlement reached but discussions ongoing.	8.60	\$525.00/hr	\$4,515.00
11/9/2020	SJS	Lit: periodic discs. with CC conc. mediation progress	0.90	\$425.00/hr	\$382.50
11/10/2020	KDM	text order re status report	0.10	\$525.00/hr	\$52.50
11/18/2020	KDM	phone call with Lou Peterson and Brian Cameron. revised settlement offer to mediator after conference with Brian Cameron.	1.60	\$525.00/hr	\$840.00
11/23/2020	KDM	review second joint status report.	0.20	\$525.00/hr	\$105.00
11/23/2020	TB	Prepare and File 2nd Joint Status Report	1.00	\$150.00/hr	\$150.00
12/14/2020	KDM	conference w/ Brian Cameron and Shayne Sutherland re settlement offer and counter.	1.70	\$525.00/hr	\$892.50
12/14/2020	SJS	Conf: with CC conc. settlement offer and counter	1.70	\$425.00/hr	\$722.50
12/17/2020	BGC	CONF CC re: DFs ER408 counteroffer; Revise PFs ER408 counteroffer per CONF	0.80	\$425.00/hr	\$340.00
12/17/2020	KDM	conference w/ Brian Cameron and Shayne Sutherland re offer and counter.	0.80	\$525.00/hr	\$420.00
12/17/2020	SJS	Conf: with CC re offer and counter	0.80	\$425.00/hr	\$340.00
1/27/2021	BGC	Rvw./verify DFs ER408 offer, case files, mediation file; CONF CC	1.00	\$425.00/hr	\$425.00
2/10/2021	BGC	CONF CC re: DFs ER408 class settlement offer; calculate variations; dev. response	1.00	\$425.00/hr	\$425.00
2/10/2021	KDM	conference w/ Brian Cameron and Shayne Sutherland re current offer and counter.	1.00	\$525.00/hr	\$525.00
2/10/2021	SJS	Conf: with CC conc. settlement offer response	1.00	\$425.00/hr	\$425.00
3/2/2021	BGC	CONF CC re: ER408 term sheet per DF request. Draft/edit term sheet.	0.80	\$425.00/hr	\$340.00

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Date		Description	Hours	Rate	Total
3/2/2021	KDM	conference with co-counsel/client re settlement offer.	0.80	\$525.00/hr	\$420.00
3/2/2021	SJS	Conf: with CC disc. settlement offer and response	0.50	\$425.00/hr	\$212.50
3/8/2021	KDM	review/edit and correspondence w/OC re settlement notice.	0.50	\$525.00/hr	\$262.50
3/16/2021	KDM	review class administration estimate from P&N. Conference w/ Shayne Sutherland and Brian Cameron re same.	0.60	\$525.00/hr	\$315.00
3/16/2021	SJS	Conf: with CC conc. class administration	0.60	\$425.00/hr	\$255.00
3/17/2021	KDM	call w/ P&N class admin and review revised report/estimates.	0.70	\$525.00/hr	\$367.50
3/29/2021	KDM	correspondence to/from Ben Stone re settlement administration.	0.20	\$525.00/hr	\$105.00
4/6/2021	BGC	Rvw. DFs MSG re: ER408; CONF CC	0.20	\$425.00/hr	\$85.00
4/15/2021	KDM	email to/from Ben Stone re class administration	0.20	\$525.00/hr	\$105.00
4/30/2021	KDM	review long-form notice and conference w/ Shayne Sutherland re same.	0.70	\$525.00/hr	\$367.50
5/7/2021	KDM	review approve proposed joint motion.	0.10	\$525.00/hr	\$52.50
5/7/2021	TB	Draft Stipulated Motion for Order Extending Deadline for Motion for Preliminary Approval of Class Settlement; Finalize and File	0.70	\$150.00/hr	\$105.00
5/21/2021	KDM	correspondence w/class admin re short-form notice.	0.40	\$525.00/hr	\$210.00
5/28/2021	SJS	Drft: Finalize discovery	1.40	\$425.00/hr	\$595.00
6/1/2021	TB	3rd Stip Motion to Extend Time to File Class Preliminary Approval Motion	0.60	\$150.00/hr	\$90.00
6/8/2021	SJS	Drft: settlement and approval docs	5.70	\$425.00/hr	\$2,422.50
6/9/2021	SJS	Drft: settlement and approval docs	4.20	\$425.00/hr	\$1,785.00
6/9/2021	TB	Revise Joint Memorandum ISO Motion for Preliminary Approval of Class Settlement; Review with Attorney; Prepare Joint Motion	1.50	\$150.00/hr	\$225.00
6/10/2021	SJS	Drft: class settlement approval documents	6.30	\$425.00/hr	\$2,677.50

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Date		Description	Hours	Rate	Total
6/10/2021	SJS	Comm: with Class Rep Administrator (0.3)	0.30	\$425.00/hr	\$127.50
6/10/2021	TB	Review Final Settlement Agreement	1.50	\$150.00/hr	\$225.00
6/13/2021	KDM	review/edit class settlement/administration docs originally drafted by Shayne Sutherland.	4.10	\$525.00/hr	\$2,152.50
6/16/2021	SJS	Comm: with Class Administrator (0.3); with OC conc. agreement (0.2); Drft: edits to class notices and settlement agreement (0.9)	1.40	\$425.00/hr	\$595.00
6/17/2021	SJS	Comm: with OC conc. settlement; Drft: edits to approval pleadings	1.20	\$425.00/hr	\$510.00
6/18/2021	SJS	Drft: edits to settlement docs concerning timeframes and typos	2.40	\$425.00/hr	\$1,020.00
6/21/2021	TB	Build TOC, TOA, for Memo ISO Motion for Class Settlement Approval; Revisions to same	4.50	\$150.00/hr	\$675.00
6/22/2021	TB	Revisions to Memo ISO Motion for Class Settlement Approval; Decl. of KDM	1.50	\$150.00/hr	\$225.00
6/24/2021	SJS	Drft: edits to Pleadings for class settlement approval	3.80	\$425.00/hr	\$1,615.00
6/28/2021	SJS	Comm: Email to OC	0.10	\$425.00/hr	\$42.50
6/29/2021	TB	Revisions to Class Settlement Pleadings & Exhibits	1.00	\$150.00/hr	\$150.00
6/30/2021	KDM	review/edits to class settlement docs.	3.80	\$525.00/hr	\$1,995.00
6/30/2021	TB	Final revisions to Proposed Orders	1.00	\$150.00/hr	\$150.00
7/1/2021	TB	Finalize and File Class Settlement Pleadings	1.00	\$150.00/hr	\$150.00
7/8/2021	SJS	Rvw: Order of Court (0.2); Conf: with CC and Teri Bracken conc. steps moving forward (0.3); Comm: with Class administrator conc. settlement (0.2)	0.70	\$425.00/hr	\$297.50
7/8/2021	SJS	Conf: prep for and attend conference with Class Administrator	0.60	\$425.00/hr	\$255.00
7/8/2021	TB	Mtg with attorney Re: Discuss Strategy	0.30	\$150.00/hr	\$45.00
7/28/2021	KDM	edits/review class notice	0.40	\$525.00/hr	\$210.00
7/28/2021	SJS	Rvw: Edits to Class Notices (0.6); Comm: email to administrator conc. edits (0.2)	0.80	\$425.00/hr	\$340.00

Daley Curry v. Greystar

August 27, 2021

Date		Description	Hours	Rate	Total
8/2/2021	SJS	Rschr: application attorney fee case law federal court; Drft: Motion in support of fees	8.40	\$425.00/hr	\$3,570.00
8/3/2021	SJS	Rvw: correspondence from Class administrator (0.1); Rvw: Order of approval for timelines and disc. with CC (0.3)	0.40	\$425.00/hr	\$170.00
8/3/2021	SJS	Drft: memo in support of fees	2.30	\$425.00/hr	\$977.50
8/4/2021	SJS	Drft: Memo in support of fees of service awards	7.60	\$425.00/hr	\$3,230.00
8/5/2021	SJS	Drft: Memo in support of fees	6.10	\$425.00/hr	\$2,592.50
8/9/2021	SJS	Rvw: Settlement website functionality (0.9)	0.50	\$425.00/hr	\$212.50
8/10/2021	SJS	Drft: Motion to extend notice date (1.2); Comm: with Class administrator (0.2); email and tc to OC conc. extension (0.2)	1.60	\$425.00/hr	\$680.00
8/10/2021	TB	Draft Proposed Stipulation & Order Extending Certain Class Deadlines	1.00	\$150.00/hr	\$150.00
8/11/2021	TB	File Stip to Extend Class Deadlines	0.40	\$150.00/hr	\$60.00
8/18/2021	KDM	edits to fee memorandum	0.60	\$525.00/hr	\$315.00
8/18/2021	SJS	Drft: Edits to memo re attorney fees	2.40	\$425.00/hr	\$1,020.00
8/18/2021	SJS	Rschr: Attorney fees reasonable rate case law (4.4)	4.40	\$425.00/hr	\$1,870.00
8/18/2021	SJS	Rvw: Time records for firm	0.90	\$425.00/hr	\$382.50
8/24/2021	BGC	Rvw. CLT intake file, facts, evidence; rsch. RCW 59.18.280, 59.18.257, etc.; DR1 case evaluation	2.20	\$425.00/hr	\$935.00
8/24/2021	SJS	Drft: attorney fee motion and supporting docs	6.50	\$425.00/hr	\$2,762.50
8/25/2021	SJS	Drft: edits to response	2.10	\$425.00/hr	\$892.50
8/26/2021	BGC	Compile time/costs records re: petition for fees	1.80	\$425.00/hr	\$765.00
8/26/2021	KDM	Draft decl. in support of fees.	0.70	\$525.00/hr	\$367.50
8/26/2021	SJS	Drft: edits to response	0.90	\$425.00/hr	\$382.50
8/26/2021	SJS	Rschr: add'l rsch on billable rates	1.10	\$425.00/hr	\$467.50
8/26/2021	SJS	Drft: Declaration in Support of Atty Fees	1.40	\$425.00/hr	\$595.00

Daley Curry v. Greystar

August 27, 2021

Date		Description	Hours	Rate	Total
8/26/2021	TB	Prepare Declaration of Kirk Miller in Support of Motion for Award of Atty Fees & Costs	0.60	\$150.00/hr	\$90.00
8/27/2021	BGC	DECL ISO costs/fees; final rvw./edits re: petition for costs/fees	1.40	\$425.00/hr	\$595.00
8/27/2021	KDM	email OC re extending page limit on motion for fees/incentive award. Review/edit motion and proposed order.	0.30	\$525.00/hr	\$157.50
8/27/2021	KDM	review/edits to motion in support of fees/costs/ class rep incentive award.	0.60	\$525.00/hr	\$315.00
Hours Total			470.00	Fee Total	\$214,027.50

Expense Detail

Date		Description	Quantity	Rate	Total
8/27/2021	KG	Filing Fee	0	\$0.00	\$400.00
8/27/2021	KG	Copy/Scans Copying	3052	\$0.35	\$1,068.20
8/27/2021	KG	Service Fee	3	\$49.95	\$149.85
Expenses Total					\$1,618.05

Fees	\$214,027.50
Expense	\$1,618.05
Current Due	\$215,645.55
Outstanding Balance	\$0.00
Total Due	\$215,645.55

Timekeeper Summary

Timekeeper	Hours	
Brian Cameron	140.60	
Kirk Miller	202.30	
Shayne J Sutherland	106.00	
Teri Bracken	21.10	
Total Hours		470.00

Daley Curry v. Greystar 1053
Mr. Ryan Daley

Due Date	Due Upon Receipt
Invoice #	60
Total Due	\$215,645.55
Amount Paid	\$ <input type="text"/>

Make payment to:

KIRK D MILLER PS
421 W Riverside Ave
Suite 660
Spokane, WA 99201
