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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

LEANNE TAN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

QUICK BOX, LLC, et al,

Defendants.

Case No.: 3:20-cv-1082-LL-DDL

**PLAINTIFF’S MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT OF MOTION FOR
ATTORNEY’S FEES, COSTS, AND
INCENTIVE AWARD FOR
KONNEKTIVE SETTLEMENT**

Date: December 27, 2024
Time: *
Ctrm: 2B
Judge: Hon. Linda Lopez

*PER CHAMBERS RULES, NO ORAL
ARGUMENT UNLESS SEPARATELY
ORDERED BY THE COURT

Complaint Filed: June 12, 2020

TABLE OF CONTENTS

Page(s)

1

2

3

4

5 **I. INTRODUCTION..... 1**

6 **II. THE COURT SHOULD AWARD ATTORNEY’S FEES AND COSTS..... 1**

7 **A. The Ninth Circuit Benchmark for Attorney’s Fees.....3**

8 **B. This Litigation Is Important And Should Be Encouraged With Upward**

9 **Adjustment of Attorney’s Fees5**

10 **C. The Results Achieved Were Highly Favorable 6**

11 **D. The Risk Involved Justifies an Upward Adjustment 7**

12 **E. Generation of Benefits Beyond Cash Settlement Fund..... 10**

13 **F. The Skill Required and The Quality of Work..... 11**

14 **G. Contingent Nature of Fee and Financial Burden to Counsel 13**

15 **H. Awards in Similar Cases 14**

16 **III. A LODESTAR CROSS-CHECK SUPPORTS THE REQUESTED AWARD . 15**

17 **A. The Reasonable Hourly Rate..... 16**

18 **B. The Hours Expended 18**

19 **C. The Cross-Check..... 19**

20 **IV. REASONABLE COSTS AND EXPENSES SHOULD BE AWARDED.....20**

21 **V. THE COURT SHOULD GRANT A REASONABLE INCENTIVE AWARD .22**

22 **VI. CONCLUSION.....25**

23

24

25

26

27

28

TABLE OF AUTHORITIES

Cases

Adam v. Barone, et al,
 No. 3:20-cv-10321 (D.N.J. 2020) 8

Aguilar v. Wawona Frozen Foods,
 No. 1:15-cv-00093-DAD-EPG,
 2017 U.S. Dist. LEXIS 4320 (E.D. Cal. Jan. 11, 2017) 23

Aichele v. City of L.A.,
 No. CV 12-10863-DMG (FFMx),
 2015 U.S. Dist. LEXIS 120225 (C.D. Cal. Sep. 9, 2015) 2, 4

Antonopulos v. N. Am. Thoroughbreds, Inc.,
 Case No. 87-0979G (CM), 1991 U.S. Dist. LEXIS 12579 (S.D. Cal. May 6, 1991)..... 5

Barbosa v. Cargill Meat Sols. Corp.,
 297 F.R.D. 431 (E.D. Cal. 2013) 12, 14

Beaver v. Tarsadia Hotels,
 No. 11-cv-01842-GPC-KSC,
 2017 U.S. Dist. LEXIS 160214 (S.D. Cal. Sep. 28, 2017)..... 4, 13, 14

Bellinghausen v. Tractor Supply Co.,
 306 F.R.D. 245 (N.D. Cal. 2015)..... 7

Blum v. Stenson,
 465 U.S. 886, 104 S. Ct. 1541 (1984)..... 16

Brown v. 22nd Dist. Agric. Ass'n,
 No. 15-cv-02578-DHB,
 2017 U.S. Dist. LEXIS 115321 (S.D. Cal. July 21, 2017) 16, 17

CGC Holding Co., Ltd. Liab. Co. v. Broad & Cassel,
 773 F.3d 1076 (10th Cir. 2014) 15

CGC Holding Co., Ltd. Liab. Co. v. Hutchens,
 No. 11-cv-01012-RBJ-KLM,
 2017 U.S. Dist. LEXIS 220354 (D. Colo. Dec. 18, 2017) 14, 15

1 *Clarke v. Insight Glob., Inc.*,
 2 No. 13-CV-0357-H (BLM),
 3 2015 U.S. Dist. LEXIS 194842 (S.D. Cal. Jan. 5, 2015)..... 6, 14
 4 *Cohorst v. BRE Props.*,
 5 No. 3:10-CV-2666-JM-BGS,
 6 2011 U.S. Dist. LEXIS 151719 (S.D. Cal. Nov. 9, 2011) 6
 7 *Craft v. Cty. of San Bernardino*,
 8 624 F. Supp. 2d 1113 (C.D. Cal. 2008) 2
 9 *Cummings v. Wyer, et al*,
 10 No. 2:19-cv-8766 (C.D. Cal. 2019) 8
 11 *Dasher v. RBC Bank United States (In re Checking Account Overdraft Litig.)*,
 12 No. 1:09-MD-02036-JLK,
 13 2020 U.S. Dist. LEXIS 142012 (S.D. Fla. Aug. 10, 2020) 5
 14 *Dunleavy v. Nadler (In re Mego Fin. Corp. Sec. Litig.)*,
 15 213 F.3d 454 (9th Cir. 2000)..... 7
 16 *Emerson v. Frazee Indus.*,
 17 No. 13cv2816 L (BLM), 2015 U.S. Dist. LEXIS 194893 (S.D. Cal. May 4, 2015)..... 6
 18 *Faircloth v. Certified Fin. Inc.*,
 19 No. 99-3097 SECTION "T" (3),
 20 2001 U.S. Dist. LEXIS 6793 (E.D. La. May 15, 2001)..... 11
 21 *Fernandez v. Victoria Secret Stores, LLC*,
 22 No. CV 06-04149 MMM (SHx),
 23 2008 U.S. Dist. LEXIS 123546, 2008 WL 8150856 (C.D. Cal. July 21, 2008) 15
 24 *Fischel v. Equitable Life Assurance Soc'y of the United States*,
 25 307 F.3d 997 (9th Cir. 2002)..... 1, 7
 26 *Fitzgerald v. Pollard*,
 27 No. 20cv848 JM(MSB),
 28 2024 U.S. Dist. LEXIS 195579 (S.D. Cal. Oct. 28, 2024) 2, 17
Gates v. Deukmejian,
 987 F.2d 1392 (9th Cir. 1992) 18

1 *Gross v. Waywell*,
 2 628 F. Supp. 2d 475 (S.D.N.Y. 2009).....9
 3 *Hale v. State Farm Mut. Auto. Ins. Co.*,
 4 No. 12-0660-DRH, 2018 U.S. Dist. LEXIS 210368 (S.D. Ill. Dec. 13, 2018)8
 5 *Hartless v. Clorox Co.*,
 6 273 F.R.D. 630 (S.D. Cal. 2011)16
 7 *Heid v. Cyracom Int'l, Inc.*,
 8 No. 22-cv-1445-MMA (KSC),
 9 2024 U.S. Dist. LEXIS 156801 (S.D. Cal. Aug. 30, 2024).....3, 15, 18
 10 *Hensley v. Eckerhart*,
 11 461 U.S. 424, 103 S. Ct. 1933 (1983).....3, 18
 12 *In re Apple Inc. Device Performance Litig.*,
 13 No. 5:18-md-02827-EJD,
 14 2021 U.S. Dist. LEXIS 50546 (N.D. Cal. Mar. 17, 2021).....21
 15 *In re Capacitors Antitrust Litig.*,
 16 No. 3:17-md-02801-JD,
 17 2018 U.S. Dist. LEXIS 169764 (N.D. Cal. Sep. 21, 2018)20, 21
 18 *In re Cendant Corp. Litig.*,
 19 264 F.3d 201 (3d Cir. 2001).....2
 20 *In re Illumina, Inc. Sec. Litig.*,
 21 No. 3:16-cv-3044-L-MSB,
 22 2019 U.S. Dist. LEXIS 217596 (S.D. Cal. Dec. 18, 2019)22, 25
 23 *In re Immune Response Sec. Litig.*,
 24 497 F. Supp. 2d 1166 (S.D. Cal. 2007).....20, 21
 25 *In re Ins. Brokerage Antitrust Litig.*,
 26 Nos. 04-5184 (GEB), 05-1079 (GEB),
 27 2007 U.S. Dist. LEXIS 25632 (D.N.J. Apr. 5, 2007).....11
 28 *In re Media Vision Tech. Sec. Litig.*,
 913 F. Supp. 1362 (N.D. Cal. 1995)20

1 *In re Mego Fin. Corp. Sec. Litig.*,
 2 213 F.3d 454 (9th Cir. 2000)..... 4
 3 *In re Merck & Co. Vytorin ERISA Litig.*,
 4 Civil Action No. 08-CV-285 (DMC),
 5 2010 U.S. Dist. LEXIS 12344 (D.N.J. Feb. 9, 2010) 14
 6 *In re Pacific Enters. Sec. Litig.*,
 7 47 F.3d 373 (9th Cir. 1995)..... 4
 8 *In re Packaged Seafood Prods. Antitrust Litig.*,
 9 No. 15-MD-2670 DMS (MDD),
 10 2022 U.S. Dist. LEXIS 150247 (S.D. Cal. Aug. 19, 2022) 20, 21
 11 *In re Yahoo! Inc. Customer Data Sec. Breach Litig.*,
 12 No. 16-MD-02752-LHK,
 13 2020 U.S. Dist. LEXIS 129939 (N.D. Cal. July 22, 2020)..... 23
 14 *Jeter-Polk v. Casual Male Store, LLC*,
 15 No. EDCV 14-891-VAP (DTBx),
 16 2016 U.S. Dist. LEXIS 193466 (C.D. Cal. Mar. 4, 2016)..... 5
 17 *Kelley v. City of San Diego*,
 18 No. 19-cv-622-GPC-BGS,
 19 2021 U.S. Dist. LEXIS 23710 (S.D. Cal. Feb. 8, 2021) 4
 20 *Khoja v. Orexigen Therapeutics*,
 21 No. 15-cv-00540-JLS-AGS,
 22 2021 U.S. Dist. LEXIS 230105 (S.D. Cal. Nov. 30, 2021) 2
 23 *Leanne Tan v. Quick Box, LLC*,
 24 No. 20cv1082-LL-DDL,
 25 2024 U.S. Dist. LEXIS 161932 (S.D. Cal. Sep. 9, 2024)..... 6
 26 *Long v. Stanley Black & Decker, Inc.*,
 27 No. 14-CV-1246 JLS (BGS),
 28 2015 U.S. Dist. LEXIS 53595 (S.D. Cal. Apr. 23, 2015)..... 17
Maley v. Del Glob. Techs. Corp.,
 186 F. Supp. 2d 358 (S.D.N.Y. 2002)..... 5

1 *Martin v. AmeriPride Servs.*,
 2 No. 08cv440-MMA (JMA),
 3 2011 U.S. Dist. LEXIS 61796 (S.D. Cal. June 9, 2011)..... 4
 4 *Monterrubio v. Best Buy Stores, L.P.*,
 5 291 F.R.D. 443 (E.D. Cal. 2013) 14
 6 *Moreno v. City of Sacramento*,
 7 534 F.3d 1106 (9th Cir. 2008) 18
 8 *Nguyen v. Radiant Pharm. Corp.*,
 9 No. SACV 11-00406 DOC(MLGx),
 10 2014 U.S. Dist. LEXIS 63312 (C.D. Cal. May 6, 2014) 7
 11 *Pasquale v. Kaiser Found. Hosps.*,
 12 No. 08CV785-MMA (NLS),
 13 2010 U.S. Dist. LEXIS 164275 (S.D. Cal. Mar. 15, 2010) 3
 14 *Physics v. Yeak*,
 15 No. CV-20-00379-TUC-JCH,
 16 2024 U.S. Dist. LEXIS 121765 (D. Ariz. July 11, 2024)..... 11
 17 *Quinones v. Chase Bank USA, N.A.*,
 18 No. 09cv2748-AJB(BGS),
 19 2012 U.S. Dist. LEXIS 54039 (S.D. Cal. Apr. 13, 2012)..... 3
 20 *Radcliffe v. Experian Info. Sols.*,
 21 715 F.3d 1157 (9th Cir. 2013) 22, 23, 24
 22 *Resnick v. Frank (In re Online DVD-Rental Antitrust Litig.)*,
 23 779 F.3d 934 (9th Cir. 2015)..... 1
 24 *Romero v. Producers Dairy Foods, Inc.*,
 25 No. 1:05cv0484 DLB, 2007 U.S. Dist. LEXIS 86270 (E.D. Cal. Nov. 13, 2007)..... 3
 26 *Ronquillo-Griffin v. TransUnion Rental Screening Sols., Inc.*,
 27 No. 17cv129 JM (BLM), 2019 U.S. Dist. LEXIS 79021 (S.D. Cal. May 9, 2019) 16
 28 *Shannon v. Sherwood Mgmt. Co.*,
 No. 19-cv-1101-BAS-JLB,
 2020 U.S. Dist. LEXIS 184286 (S.D. Cal. Oct. 5, 2020) 10

1 *Spann v. J.C. Penney Corp.*,
 2 314 F.R.D. 312 (C.D. Cal. 2016).....23, 25
 3 *Spencer-Ruper v. Scientiae*,
 4 No. 8:19-cv-01709-DOC - ADS,
 5 2021 U.S. Dist. LEXIS 204246 (C.D. Cal. Sep. 24, 2021) 12
 6 *Staton v. Boeing Co.*,
 7 327 F.3d 938 (9th Cir. 2003).....25
 8 *Stovall-Gusman v. W.W. Granger, Inc.*,
 9 No. 13-cv-02540-HSG, 2015 U.S. Dist. LEXIS 78671 (N.D. Cal. June 17, 2015)..... 7
 10 *Sypherd v. Lazy Dog Rests., LLC*,
 11 No. 5:20-cv-00921-FLA (KKx),
 12 2023 U.S. Dist. LEXIS 23257 (C.D. Cal. Feb. 10, 2023) 4
 13 *Tan v. Quick Box, LLC*,
 14 No. 3:20-cv-01082-H-DEB,
 15 2021 U.S. Dist. LEXIS 67791 (S.D. Cal. Apr. 7, 2021)..... 10
 16 *Testone v. Barlean's Organic Oils, LLC*,
 17 No. 3:19-cv-00169-RBM-BGS,
 18 2023 U.S. Dist. LEXIS 37308 (S.D. Cal. Mar. 6, 2023) 13
 19 *Thieriot v. Celtic Ins. Co.*,
 20 No. C 10-04462 LB,
 21 2011 U.S. Dist. LEXIS 44852 (N.D. Cal. Apr. 21, 2011)..... 4
 22 *Vallejo v. Sterigenics U.S., Ltd. Liab. Co.*,
 23 No. 20-cv-01788-AJB-AHG,
 24 2023 U.S. Dist. LEXIS 216241 (S.D. Cal. Dec. 5, 2023)22
 25 *Velez v. Roche*,
 26 No. C-02-0337 EMC,
 27 2004 U.S. Dist. LEXIS 29848 (N.D. Cal. Sep. 22, 2004) 17
 28 *Vizcaino v. Microsoft Corp.*,
 290 F.3d 1043 (9th Cir. 2002)2, 9

1 *Williams v. SuperShuttle Int'l, Inc.*,

2 No. 12-CV-06493-WHO,

3 2015 U.S. Dist. LEXIS 19341, 2015 U.S. Dist. LEXIS 19341 (N.D. Cal. Feb. 12,

4 2015).....20

5 *Wininger v. SI Mgmt. L.P.*,

6 301 F.3d 1115 (9th Cir. 2002)20

7 *Ziegler v. GW Pharms., PLC*,

8 No. 21-cv-1019-BAS-MSB,

9 2024 U.S. Dist. LEXIS 52979 (S.D. Cal. Mar. 25, 2024) 18, 19

10 **Rules**

11 Fed. R. Civ. P. 23 1

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1 **I. INTRODUCTION**

2 Plaintiff and the Konnektive Defendants (Konnektive LLC, Konnektive Corporation,
3 Matthew Martorano, and Kathryn Martorano) have agreed to a Class Settlement to resolve
4 the putative Class’s claims against those Defendants in exchange for either \$2 million or \$5
5 million, depending on the results of a bench trial on the CLRA claim. Plaintiff now
6 respectfully requests that the Court award attorney’s fees, costs, and an incentive award to
7 Ms. Tan.

8 **II. THE COURT SHOULD AWARD ATTORNEY’S FEES AND COSTS**

9 “In a certified class action, the court may award reasonable attorney's fees and
10 nontaxable costs that are authorized by law or by the parties’ agreement.” Fed. R. Civ. P.
11 23(h). The parties have not negotiated an agreement to attorney’s fees and nontaxable costs,
12 so the Court may award fees and costs that are authorized by law. Class Counsel requests
13 that the Court award one-third of the common fund in attorneys’ fees, which will be either
14 \$666,666 or \$1,666,666, depending on whether \$2 million or \$5 million is awarded as a
15 result of the bench trial.

16 The Ninth Circuit has identified a non-exhaustive list of factors to consider in
17 determining whether a fee award is reasonable in the class action context: “the extent to
18 which class counsel ‘achieved exceptional results for the class,’ whether the case was risky
19 for class counsel, whether counsel's performance ‘generated benefits beyond the cash
20 settlement fund,’ the market rate for the particular field of law (in some circumstances), the
21 burdens class counsel experienced while litigating the case (e.g., cost, duration, foregoing
22 other work), and whether the case was handled on a contingency basis.” *Resnick v. Frank*
23 (*In re Online DVD-Rental Antitrust Litig.*), 779 F.3d 934, 954-55 (9th Cir. 2015).

24 “In a common fund case, the district court has discretion to apply either the lodestar
25 method or the percentage-of-the-fund method in calculating a fee award.” *Fischel v.*
26 *Equitable Life Assurance Soc’y of the United States*, 307 F.3d 997, 1006 (9th Cir. 2002).
27 “One way that a court may demonstrate that its use of a particular method or the amount
28 awarded is reasonable is by conducting a cross-check using the other method.” *Resnick*, 779

1 F.3d at 949. Another court in this Circuit surveyed a number of cases on the question of
2 whether the percentage of common fund or the lodestar approach was preferable, and
3 concluded that there was a “general trend towards the percentage of the fund method to
4 award class attorneys' fees.” *Craft v. Cty. of San Bernardino*, 624 F. Supp. 2d 1113, 1123-
5 25 (C.D. Cal. 2008). The Ninth Circuit agrees: “while the primary basis of the fee award
6 remains the percentage method, the lodestar may provide a useful perspective on the
7 reasonableness of a given percentage award.” *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043,
8 1050 (9th Cir. 2002). *Vizcaino* explained that this was because “it is widely recognized that
9 the lodestar method creates incentives for counsel to expend more hours than may be
10 necessary on litigating a case so as to recover a reasonable fee....” *Id.* at 1050 n.5.

11 Courts in this District have agreed that the percentage of the common fund approach is
12 the preferable one. *Khoja v. Orexigen Therapeutics*, No. 15-cv-00540-JLS-AGS, 2021 U.S.
13 Dist. LEXIS 230105 at *27 (S.D. Cal. Nov. 30, 2021) (“Many courts and commentators
14 have recognized that the percentage of the available fund analysis is the preferred approach
15 in class action fee requests because it more closely aligns the interests of the counsel and
16 the class, i.e., class counsel directly benefit from increasing the size of the class fund and
17 working in the most efficient manner.”) (quoting *Aichele v. City of L.A.*, No. CV 12-10863-
18 DMG (FFMx), 2015 U.S. Dist. LEXIS 120225 at *15 (C.D. Cal. Sep. 9, 2015)).

19 Class Counsel believes the percentage of the common fund approach is the better one
20 for these reasons. If the Court agrees and selects this method, a recent decision makes clear
21 that the Court “need not engage in a full-blown lodestar analysis when the primary basis
22 remains the percentage method” but can instead conduct a truncated lodestar analysis to
23 provide a “useful perspective” on the common fund. *Fitzgerald v. Pollard*, No. 20cv848
24 JM(MSB), 2024 U.S. Dist. LEXIS 195579 at *28 (S.D. Cal. Oct. 28, 2024).

25 Another significant advantage of using the percentage of the common fund approach
26 is that it minimizes potential difficulties with the lodestar method when applied to the partial
27 settlement situation that exists here. Even when applying the lodestar method to a single-
28 defendant case, that method has flaws. The Third Circuit, for example, noted that the

1 lodestar method “requires an enormous investment of judicial time.” *In re Cendant Corp.*
2 *Litig.*, 264 F.3d 201, 256 (3d Cir. 2001). And “though creating the illusion of mathematical
3 precision, the lodestar method can be quite subjective and can produce wildly varying
4 awards in otherwise similar cases.” *Id.* Counsel has been unable to locate authority on the
5 question of how to allocate hours across multiple defendants in a class action common fund
6 lodestar context. In the context of awarding attorney’s fees and costs as part of a judgment
7 involving fee-shifting statutes, caselaw generally permits attorneys fees to be awarded, for
8 example, for successful claims on unsuccessful claims based on similar facts and legal
9 theories where the claims are intertwined or related in such a way that preparing on one
10 claim assists in prevailing on the other. *See, e.g., Hensley v. Eckerhart*, 461 U.S. 424, 103
11 S. Ct. 1933 (1983); *Quinones v. Chase Bank USA, N.A.*, No. 09cv2748-AJB(BGS), 2012
12 U.S. Dist. LEXIS 54039 at *15-16 (S.D. Cal. Apr. 13, 2012) (collecting cases). While not
13 directly on-point, this suggests that in a RICO class action alleging a conspiracy among
14 various defendants, work as to one Defendant is inextricably intertwined with work as to
15 another. Under the heavily favored percentage of the common fund approach, this issue is
16 largely moot, and the lodestar method should be used as a rough cross-check to satisfy the
17 Court as to the reasonableness of fees.

18 **A. The Ninth Circuit Benchmark for Attorney’s Fees**

19 The Ninth Circuit has established a “benchmark” for the percentage award for
20 attorneys’ fees in a class action lawsuit of twenty-five percent of the common fund. *Heid v.*
21 *Cyacom Int’l, Inc.*, No. 22-cv-1445-MMA (KSC), 2024 U.S. Dist. LEXIS 156801 at *30
22 (S.D. Cal. Aug. 30, 2024). But upward departures from this benchmark are routine. In *Heid*,
23 for example, the court awarded one-third of the common fund because the settlement was
24 “achieved by extensive work by Class Counsel, including informal class discovery,
25 extensive investigation into the merits of the case, and a full-day mediation, which resulted
26 in a meaningful settlement following a mediator's proposal.” *Id.* at *31.

27 “[I]n most common fund cases, the award exceeds that benchmark.” *Pasquale v.*
28 *Kaiser Found. Hosps.*, No. 08CV785-MMA (NLS), 2010 U.S. Dist. LEXIS 164275 at *10

1 (S.D. Cal. Mar. 15, 2010). In fact, it is far more common for the award to be one-third than
2 not. *See Romero v. Producers Dairy Foods, Inc.*, No. 1:05cv0484 DLB, 2007 U.S. Dist.
3 LEXIS 86270 at *10 (E.D. Cal. Nov. 13, 2007) (noting that “fee awards in class actions
4 average around one-third of the recovery”); *Sypherd v. Lazy Dog Rests., LLC*, No. 5:20-cv-
5 00921-FLA (KKx), 2023 U.S. Dist. LEXIS 23257 at *12 (C.D. Cal. Feb. 10, 2023) (holding
6 that “awarding over this benchmark is not unusual” and suggesting that in practice “the
7 benchmark is closer to 30%”). “District courts in this circuit have routinely awarded fees of
8 one-third of the common fund or higher after considering the particular facts and
9 circumstances of each case.” *Beaver v. Tarsadia Hotels*, No. 11-cv-01842-GPC-KSC, 2017
10 U.S. Dist. LEXIS 160214 at *31 (S.D. Cal. Sep. 28, 2017).

11 Courts also consider the size of the common fund, with higher percentages being
12 awarded for amounts in the range of the fund here. *See Kelley v. City of San Diego*, No. 19-
13 cv-622-GPC-BGS, 2021 U.S. Dist. LEXIS 23710 at *25 (S.D. Cal. Feb. 8, 2021) (“In cases
14 where the common fund is under \$10 million, fees are often above 25%.”); *Aichele v. City*
15 *of L.A.*, No. CV 12-10863-DMG (FFMx), 2015 U.S. Dist. LEXIS 120225 at *16-17 (C.D.
16 Cal. Sep. 9, 2015) (“In contrast, in cases under \$10 million, the awards more frequently will
17 exceed the 25% benchmark, and indeed go above 30%.”); *Thieriot v. Celtic Ins. Co.*, No. C
18 10-04462 LB, 2011 U.S. Dist. LEXIS 44852 at *17 (N.D. Cal. Apr. 21, 2011) (“[I]t is
19 common practice to award attorneys' fees at a higher percentage than the 25% benchmark
20 in cases that involve a relatively small — i.e., under \$10 million — settlement fund.”).

21 This is confirmed by surveys of the case law which have been cited by courts in this
22 District: “Other case law surveys suggest that 50% is the upper limit, with 30-50%
23 commonly being awarded in cases in which the common fund is relatively small.... More
24 particularly, courts may award attorneys fees in the 30-40% range in wage and hour class
25 actions that result in recovery of a common fun under \$10 million.” *Martin v. AmeriPride*
26 *Servs.*, No. 08cv440-MMA (JMA), 2011 U.S. Dist. LEXIS 61796 at *22-23 (S.D. Cal. June
27 9, 2011). The Ninth Circuit has also affirmed awards of one-third of the common fund. *See*
28 *In re Mego Fin. Corp. Sec. Litig.*, 213 F.3d 454, 457-460 (9th Cir. 2000) (affirming an

1 award of one-third of total recovery); *In re Pacific Enters. Sec. Litig.*, 47 F.3d 373, 379 (9th
2 Cir. 1995) (affirming an award of one-third of a \$12 million common fund).

3 **B. This Litigation Is Important And Should Be Encouraged With Upward**
4 **Adjustment of Attorney’s Fees**

5 One key factor courts consider in whether to upwardly adjust the benchmark for
6 attorney’s fees in a class action is the importance of the type litigation being pursued. This
7 is because certain types of class actions should be encouraged to benefit the public: “In
8 order to encourage first-rate attorneys to represent plaintiffs on a contingent basis in this
9 type of important litigation, the attorney’s fees awarded must be sufficient to reward them
10 for their efforts and to allow them to fight again another day for deserving clients.”
11 *Antonopulos v. N. Am. Thoroughbreds, Inc.*, Case No. 87-0979G (CM), 1991 U.S. Dist.
12 LEXIS 12579 at *9 (S.D. Cal. May 6, 1991).

13 This need to upwardly adjust the attorney’s fees benchmark to encourage contingent-
14 fee counsel to take on socially important lawsuits has been recognized by many courts. *See*
15 *Jeter-Polk v. Casual Male Store, LLC*, No. EDCV 14-891-VAP (DTBx), 2016 U.S. Dist.
16 LEXIS 193466 at *13 (C.D. Cal. Mar. 4, 2016) (“Adjusting court-awarded fees upward in
17 contingent fee cases to reflect the risk of recovering no compensation for hundreds of hours
18 of work makes those fee awards consistent with the legal marketplace, and in so doing,
19 helps to ensure that meritorious cases will be brought to enforce important public interest
20 policies and that clients who have meritorious claims, but lack financial resources, will be
21 better able to obtain qualified counsel.”); *Dasher v. RBC Bank United States (In re Checking*
22 *Account Overdraft Litig.)*, No. 1:09-MD-02036-JLK, 2020 U.S. Dist. LEXIS 142012 at
23 *51-52 (S.D. Fla. Aug. 10, 2020) (“Class Counsel undertook an incredibly risky and
24 undesirable case and, through their diligence, perseverance, and skill, obtained an
25 outstanding result for the settlement class.... The Court firmly believes this kind of initiative
26 and skill must be adequately compensated to ensure that counsel of this caliber is available
27 to undertake these kinds of risky but important cases in the future.”). Protecting the public
28 from fraud—particularly elderly members of the public—is a socially important category

1 of litigation which should be encouraged via attorney’s fees awards. *Maley v. Del Glob.*
2 *Techs. Corp.*, 186 F. Supp. 2d 358, 374 (S.D.N.Y. 2002) (“Private attorneys should be
3 encouraged to take the risks required to represent those who would not otherwise be
4 protected from socially undesirable activities like securities fraud.”).

5 **C. The Results Achieved Were Highly Favorable**

6 The first factor the Ninth Circuit has identified for consideration in determining
7 whether a proposed attorney’s fees award is reasonable is “the results achieved.” *Clarke v.*
8 *Insight Glob., Inc.*, No. 13-CV-0357-H (BLM), 2015 U.S. Dist. LEXIS 194842 at *20 (S.D.
9 Cal. Jan. 5, 2015); *see also Cohorst v. BRE Props.*, No. 3:10-CV-2666-JM-BGS, 2011 U.S.
10 Dist. LEXIS 151719 at *57 (S.D. Cal. Nov. 9, 2011) (“Courts have consistently recognized
11 that the result achieved is a major factor to be considered in making a fee award.”); *Emerson*
12 *v. Frazee Indus.*, No. 13cv2816 L (BLM), 2015 U.S. Dist. LEXIS 194893 at *13 (S.D. Cal.
13 May 4, 2015) (“The overall result and benefit to the class from the litigation is the most
14 critical factor in granting a fee award.”).

15 In its order granting preliminary approval, the Court recognized that the settlement
16 “provides a substantial monetary benefit to the Class....” Dkt. 486 at 3. Plaintiff’s estimate
17 of the actual damages for a nationwide class is slightly over \$6.4 million. Decl. of C. Covey
18 at ¶ 29. Trebling of this number would lead to maximum damages of just over \$19.2 million.
19 This is consistent with the estimates of maximum liability provided in bankruptcy by the La
20 Pura Defendants. Decl. of K. Kneupper at ¶ 31. While there have been slight differences
21 during negotiations in estimations of the potential damages by the Defendants and Plaintiff,
22 the variance was extremely small.¹

23 Based on the numbers estimated by Plaintiff, if the bench trial results in an award of
24 \$2 million, the partial settlement will amount to 31.25% of the actual damages, and 10.41%
25 of those damages if trebled. If the bench trial results in an award of \$5 million, the partial
26

27 ¹ That variance was based on how to adjust for chargebacks and refunds, but because the total amount
28 billed to the Class without any adjustment for chargebacks or refunds was \$7.63 million, Plaintiff’s
estimate of the maximum theoretical damages is necessarily close to the actual theoretical maximum.
Decl. of C. Covey at ¶ 29.

1 settlement will amount to 78.12% of the actual damages, and 26.04% of those damages if
2 trebled. These numbers are for the Konnektive settlement alone, exclusive of Quick Box.

3 Other courts in this Circuit have recognized results similar to this one as an “excellent
4 recovery,” and this settlement is at the high end of recoveries in a class action. *See Nguyen*
5 *v. Radiant Pharm. Corp.*, No. SACV 11-00406 DOC(MLGx), 2014 U.S. Dist. LEXIS
6 63312 at *7-8 (C.D. Cal. May 6, 2014) (describing a settlement of “roughly 25.8 percent of
7 the maximum provable damages” as “an excellent recovery”); *Dunleavy v. Nadler (In re*
8 *Mego Fin. Corp. Sec. Litig.)*, 213 F.3d 454, 459 (9th Cir. 2000) (describing a recovery of
9 roughly 16.67% of the maximum damages as “fair and adequate”); *Bellinghausen v. Tractor*
10 *Supply Co.*, 306 F.R.D. 245, 256 (N.D. Cal. 2015) (describing a settlement that “represents
11 between 27 percent and 11 percent of the total potential recovery” as “fair”); *Stovall-*
12 *Gusman v. W.W. Granger, Inc.*, No. 13-cv-02540-HSG, 2015 U.S. Dist. LEXIS 78671 at
13 *12-13 (N.D. Cal. June 17, 2015) (describing a settlement of 7.3 percent as “on the low end
14 of the spectrum for class settlement awards receiving approval” but still “within the range
15 of reasonableness”).

16 Also significant in evaluating the results is that unlike these other cases, this is a partial
17 settlement, and there will be additional recovery of \$5.5 million from the Quick Box Parties.
18 Even at the low end, when the settlements are combined, Class Counsel will have recovered
19 in total either 117% of the actual damages at the low end, or 164% of the actual damages at
20 the high end.

21 **D. The Risk Involved Justifies an Upward Adjustment**

22 Another factor is “the risks of litigation.” *Clarke*, 2015 U.S. Dist. LEXIS 194842 at
23 *20. The risk involved in the case “should be assessed when an attorney determines that
24 there is merit to the client's claim and elects to pursue the claim on the client's behalf. This
25 will likely occur before a lawsuit is filed.” *Fischel*, 307 F.3d at 1009. In this case, Class
26 Counsel began specifically evaluating the La Pura product around early January 2020, and
27 Ms. Tan retained Class Counsel shortly thereafter. Decl. of K. Kneupper at ¶ 32.

1 At that time, Class Counsel was only aware of the Quick Box Parties as potential
2 Defendants, and had not yet discovered the identities of the La Pura Parties or the existence
3 of / involvement of the Konnektive Parties. *Id.* at ¶ 32. Class Counsel had no way to
4 determine what the potential damages were or the volume of products sold. *Id.* The lawsuit
5 was filed as part of a broader investigation of the “affiliate marketing” industry—with
6 significant time spent by Class Counsel on several less-successful lawsuits which identified
7 smaller players. *Id.*; see, e.g., *Adam v. Barone, et al*, No. 3:20-cv-10321 (D.N.J. 2020);
8 *Cummings v. Wyer, et al*, No. 2:19-cv-8766 (C.D. Cal. 2019).

9 Class Counsel’s efforts were even reported in the media as being almost certainly an
10 exercise in futility—not for lack of merit, but for lack of collectability. Courthouse News
11 reported on this lawsuit with the sub-headline “finding the culprit behind the alleged
12 conspiracy — and recovering damages — poses a challenge.”² The article described the
13 collectability problem in this lawsuit as follows: “It’s going to be like getting blood from a
14 rock.” *Id.* The article included the quote: “I applaud the consumer attorneys who are
15 bringing this case, but the pot at the end of the rainbow may be empty.” *Id.*

16 The skepticism was largely the conventional wisdom. In another case awarding fees in
17 a RICO case in another Circuit, the court noted: “It would be difficult to overstate the risk
18 that this case presented at the outset. As a threshold matter, successful RICO actions are
19 exceedingly rare.” *Hale v. State Farm Mut. Auto. Ins. Co.*, No. 12-0660-DRH, 2018 U.S.
20 Dist. LEXIS 210368 at *30 (S.D. Ill. Dec. 13, 2018). “Successful RICO class actions are
21 rarer still.” *Id.* The *Hale* court was not exaggerating—it cited to the following detailed
22 explanation by another court:

23 RICO's enchantment, like the siren's song, has again drawn another crew of
24 spellbound plaintiffs foundering against the rocks. This outcome should come
25 as no surprise to any counsel versed in the formidable intricacies and pitfalls
26 inherent in RICO litigation. These challenges bear out in the minimal rate of
success plaintiffs have achieved in prosecuting RICO actions. A survey of 145

27 ² Maria Dinzeo, *Class Action Claims Over ‘Free Trial’ Skin Cream Scam Advance*, COURTHOUSE NEWS,
28 Apr. 9, 2021 at <https://www.courthousenews.com/class-action-claims-over-free-trial-skin-cream-scam-advance/>.

1 appellate decisions nationwide rendered from 1999 to 2001 in connection with
2 RICO civil actions provides hard evidence of those failed expectations. It
3 revealed that about 70 percent of the cases were finally disposed of on
4 defendants' motions to dismiss or for summary judgment, and that in about 80
5 percent of those in which the appellate Court resolved a RICO issue the ruling
6 was favorable to defendants. *See* Pamela H. Bucy, *Private Justice*, 76 S. Cal.
7 L. Rev. 1, 22 (2002). Of the 9.6 percent of the suits in which plaintiffs obtained
8 a favorable verdict after a jury trial, only 25 percent of the judgments were
9 affirmed on appeal. *See id.* In consequence, plaintiffs achieved a final victory
10 in only three of 145 cases -- a or final success rate of a mere two percent.

11 Framed another way, the statistical record indicates that in 98 percent of the
12 RICO appellate cases surveyed, which do not include RICO actions dismissed
13 by the district courts but not appealed, plaintiffs and counsel invested extensive
14 time and energies in litigation only to come away with a total loss.

15 *Gross v. Waywell*, 628 F. Supp. 2d 475, 479-80 (S.D.N.Y. 2009). The court continued with
16 an analysis of recent cases in the Southern District of New York:

17 To further examine this statistical record with more recent data, and also
18 contrast it with a sample of RICO results at the district court level, this Court
19 conducted a rough survey of the 145 cases filed in the Southern District of New
20 York from 2004 through 2007 in which the complaints asserted civil RICO
21 claims. The study revealed that of the 36 cases that to date have been resolved
22 on the merits, all resulted in judgments against the plaintiffs.

23 *Id.* at 480. While the *Gross* court noted that this “stunningly awful” success rate in RICO
24 claims was often due to overreach by plaintiffs’ attorneys (who, as the court noted,
25 frequently attempted to use RICO in divorce cases or other implausible and inappropriate
26 scenarios), much of the risk to plaintiffs is due to the complexity of the statute, and the
27 opportunities this creates for defendants to throw a spanner in the works.

28 Class Counsel chose to pursue this case despite these risks—and despite the collective
wisdom being that it was effectively a fool’s errand that might be for the greater good, but
would never recover a dime. Having taken that risk, and having defied the conventional
assessment of these odds, Class Counsel’s fees warrant upward adjustment.

1 **E. Generation of Benefits Beyond Cash Settlement Fund**

2 In determining the amount to award in attorney’s fees, Courts consider whether
3 “counsel's performance generated benefits beyond the cash settlement fund.” *Vizcaino*, 290
4 F.3d at 1049. One example of such benefits in *Vizcaino* was that the lawsuit resulted in
5 “clarifying the law of temporary worker classification.” *Id.*

6 The pursuit of this litigation by Class Counsel has resulted in such benefits. First, the
7 La Pura product at issue is no longer being sold and its website has been removed from the
8 Internet. Decl. of K. Kneupper at ¶ 33. The numerous shell companies involved in the
9 alleged fraud appear to no longer be operative, and Rocket Management Group, the
10 company behind the product and various other similar schemes, has forfeited its right to do
11 business based on California Secretary of State filings. Ex. 1. And Kiet Lieu, a principal of
12 RMG who pled the Fifth Amendment in this case, has since been sued by various credit
13 card companies, including one suit for nearly \$150,000. Ex. 2. The size of that collections
14 lawsuit suggests that Mr. Lieu ran out of money at some point during the litigation, meaning
15 he could not still be operating the scheme. Shutting down the sales of this product and others
16 by RMG provided a substantial benefit to consumers nationwide, even apart from the
17 common fund that was recovered. Second, the legal rulings in this case have clarified the
18 law by establishing that third-party vendors who knowingly assist in a “free trial scam” can
19 potentially be held liable for the damage caused by the scheme. *Tan v. Quick Box, LLC*, No.
20 3:20-cv-01082-H-DEB, 2021 U.S. Dist. LEXIS 67791 (S.D. Cal. Apr. 7, 2021). And third,
21 there is inherently a deterrent effect in Class Counsel’s pursuit of this litigation (which was
22 a part of multiple other class action lawsuits directed at the “affiliate marketing” industry
23 as a whole). Members of that industry are now well aware that there can be monetary
24 consequences for participating in or assisting such activities, and by pursuing this lawsuit,
25 a signal has been sent that knowing involvement in similar schemes is not tolerated.

1 **F. The Skill Required and The Quality of Work**

2 Another factor for consideration is “the skill required and the quality of work.”
3 *Shannon v. Sherwood Mgmt. Co.*, No. 19-cv-1101-BAS-JLB, 2020 U.S. Dist. LEXIS
4 184286 at *5 (S.D. Cal. Oct. 5, 2020).

5 As to the skill required, other courts have described RICO as one of the most complex
6 statutes ever enacted by Congress. *In re Ins. Brokerage Antitrust Litig.*, Nos. 04-5184
7 (GEB), 05-1079 (GEB), 2007 U.S. Dist. LEXIS 25632 at *47 (D.N.J. Apr. 5, 2007). As
8 another court put it when considering this factor as to a RICO class action:

9 [T]here is no dispute that the present case is an extraordinarily complex RICO
10 class action involving multiple defendants. Not only are the RICO statutes
11 extremely intricate and technical, but the underlying loan transactions in this
12 case involve complex interest calculations and sophisticated financial theories.
13 Furthermore, a RICO cause of action super-imposed upon the procedural
14 hurdles of Rule 23 of the Federal Rules of Civil Procedure unquestionably
15 presents formidable challenges to any litigant. Therefore, this Court finds that
16 the novel and difficult issues present in this RICO case warrant the application
17 of an enhanced multiplier.

18 Third, this Court finds that the skill required to perform the legal services in
19 this action also weigh in favor of applying a multiplier to the lodestar in this
20 case. The complexities of the RICO issues alone required substantial skill and
21 expertise on the part of Class Counsel, but this case also involved sophisticated
22 financial theories and complex interest calculations. Class Counsel was
23 required to gain a firm understanding of these theories and calculations in order
24 to adequately prosecute the above-captioned action.

25 *Faircloth v. Certified Fin. Inc.*, CIVIL ACTION NO. 99-3097 SECTION "T" (3), 2001 U.S.
26 Dist. LEXIS 6793, at *32-33 (E.D. La. May 15, 2001).

27 While this case did not involve loan transactions as in *Faircloth*, it involved
28 something arguably more complex: understanding the functionality of complex computer
software, as well as understanding of the intricacies of the payment processing system and
its rules, and unearthing the tactics used as part of the scheme to circumvent them. *Physics*
v. Yeak, No. CV-20-00379-TUC-JCH, 2024 U.S. Dist. LEXIS 121765 at *7 (D. Ariz. July
11, 2024) (“Legal expertise aside, the subject matter here involved several complex and

1 technical scientific issues.”). Not only did Class Counsel have to understand software, but
2 to successfully pursue the case, they had to **develop** software that was customized to
3 download and preserve the evidence at issue. Decl. of C. Covey at ¶ 30. Class Counsel
4 further had to grapple with complex bankruptcy law issues before a bankruptcy judge after
5 Defendant Total Health Supply TUA, Inc. declared bankruptcy and invoked the automatic
6 bankruptcy stay to stop discovery. Decl. of K. Kneupper at ¶ 31. The case also required the
7 skill to deal with numerous novel legal issues raised over the years that it was ongoing. *See,*
8 *e.g., Spencer-Ruper v. Scientiae*, No. 8:19-cv-01709-DOC - ADS, 2021 U.S. Dist. LEXIS
9 204246 at *6-7 (C.D. Cal. Sep. 24, 2021) (listing the various complex activities counsel
10 there had to engage in, which occurred here as well).

11 And finally, the investigation which uncovered the conduct underlying the suit was
12 extraordinarily complex. It involved, among other things: (1) identifying online forums and
13 in-person conferences through which scammers communicated; (2) Class Counsel attending
14 a conference in person at which scammers were known to attend to collect evidence and
15 identify the companies involved; (3) sifting through the corporate records and websites of
16 nearly a hundred shell companies; (4) numerous interviews of former employees; (5)
17 developing software to preserve the numerous websites at issue; and (6) using this litigation
18 to identify defendants who were known to exist but were, at the time, unknown Doe(s).
19 Decl. of K. Kneupper at ¶ 34.

20 As to the quality of the work, Class Counsel prevailed against numerous motions to
21 dismiss or otherwise attempt to defeat the claims. Class Counsel successfully discovered
22 the details behind the scheme through extensive, hotly-contested discovery. The various
23 Defendants were represented by multiple defense firms (Perkins Coie, an Am Law 50 firm;
24 as well as Gordon Rees Scully Mansukhani; Kronenberger Rosenfeld; and Tyz Law Group).
25 “The quality of opposing counsel is important in evaluating the quality of Class Counsel's
26 work.” *Barbosa v. Cargill Meat Sols. Corp.*, 297 F.R.D. 431, 449 (E.D. Cal. 2013). Class
27 Counsel successfully certified the class and ultimately reached a highly favorable
28 settlement, which speaks to the quality of the work performed and suggests it was high.

1 **G. Contingent Nature of Fee and Financial Burden to Counsel**

2 Another factor (or factors) courts consider is the contingent nature of the fee and the
3 financial burden to counsel of undertaking the case. Many courts roll this into a single factor
4 because the two are related / overlapping. *See Testone v. Barlean's Organic Oils, LLC*, No.
5 3:19-cv-00169-RBM-BGS, 2023 U.S. Dist. LEXIS 37308 at *13-14 (S.D. Cal. Mar. 6,
6 2023) (listing as the fourth factor for consideration “the contingent nature of the fee and the
7 financial burden carried by the plaintiffs”).

8 The *Testone* case involved similar facts, which the Court found justified an upward
9 adjustment to one-third of the common fund. *Testone*, 2023 U.S. Dist. LEXIS 37308 at *18.
10 The *Testone* court described a similar scenario to the one here: “Class Counsel's prosecution
11 of this action involved significant financial risk, as Class Counsel undertook the matter
12 solely on a contingency basis, against a well-represented Defendant, and therefore risked
13 no recovery.” *Id.* “Class Counsel worked on this matter for four years without compensation
14 and advanced nearly \$160,000 in out-of-pocket expenses.” *Id.* “Class Counsel had no other
15 financing or assistance in funding the litigation.” *Id.* “Class Counsel's ability to file and
16 prosecute other cases was impacted by their representation of the Class in this action, as the
17 firm consists of only five attorneys and accordingly has limited legal support.” *Id.*

18 Here, as in *Testone*, this factor weighs in favor of a higher percentage-of-the-fund
19 award. Counsel here likewise took this matter on a contingent basis, against well-
20 represented Defendants, and worked out of pocket for more than four years to date without
21 compensation. Decl. of K. Kneupper at ¶ 35. Class Counsel has advanced a higher number
22 in expenses, closer to \$400,000. *Id.* Class Counsel had no outside funding, and instead
23 advanced these costs from personal assets or the proceeds of other litigation. *Id.* While
24 Kneupper & Covey currently consists of seven attorneys, at the time of filing, it only
25 consisted of Mr. Kneupper and Mr. Covey. *Id.* Counsel could have filed and prosecuted
26 other cases during this period instead of this one, as the firm generally receives requests for
27 representation from more than one hundred potential clients every week. *Id.*

1 Another case, *Beaver v. Tarsadia Hotels*, No. 11-cv-01842-GPC-KSC, 2017 U.S.
2 Dist. LEXIS 160214 (S.D. Cal. Sep. 28, 2017), also awarded a one-third fee as a percentage
3 of the common fund, in part because of the risks counsel had assumed by taking the case on
4 a contingent fee. That court noted that: “Courts have long recognized that the attorneys’
5 contingent risk is an important factor in determining the fee award and may justify awarding
6 a premium over an attorneys’ normal hourly rates.” *Id.* at *40-41 (quoting *Monterrubio v.*
7 *Best Buy Stores, L.P.*, 291 F.R.D. 443, 457 (E.D. Cal. 2013)). The court held: “Counsel
8 assumed all the financial risk of the case, since the fee arrangement required Class Counsel
9 to bear all of the costs of litigation. Even with the Court’s finding in favor of Plaintiffs on
10 liability, there was still a risk that the Court would agree with defendants’ restitution
11 methodology and award zero in restitution - thus leaving Class Counsel with no
12 remuneration for six years and 9,104 hours of work and the nearly \$200,000 they spent over
13 the course of this case. That substantial risk warrants an appropriate fee.” *Beaver*, 2017 U.S.
14 Dist. LEXIS 160214 at *41.

15 “Like this case, where recovery is uncertain, an award of one-third of the common
16 fund as attorneys’ fees has been found to be appropriate.” *Barbosa*, 297 F.R.D. at 449. There
17 have been many points in this case already at which Class Counsel could have been left
18 with nothing at all, and adverse summary judgment rulings or an adverse decision by a jury
19 could done the same. As discussed above, this case was likely significantly riskier than the
20 average class action, and thus warrants a higher fee.

21 **H. Awards in Similar Cases**

22 A factor that is sometimes included in lists for consideration is awards in similar
23 cases. *See Clarke*, 2015 U.S. Dist. LEXIS 194842 at *20 (awarding one-third of common
24 fund). As discussed above, one-third of the common fund is a typical award in cases with
25 common funds in the range of \$10 million. In *In re Merck & Co. Vytarin ERISA Litig.*, Civil
26 Action No. 08-CV-285 (DMC), 2010 U.S. Dist. LEXIS 12344 at *9-11 (D.N.J. Feb. 9,
27 2010), the court awarded one-third of a common fund in a class action lawsuit involving
28 both RICO claims and claims under the New Jersey Consumer Fraud Act. However, as the

1 court there noted, the Third Circuit uses a different benchmark than the Ninth Circuit (using
2 a benchmark of one-third for settlements under \$100,000,000). Another court, *CGC*
3 *Holding Co., Ltd. Liab. Co. v. Hutchens*, Civil Action No. 11-cv-01012-RBJ-KLM, 2017
4 U.S. Dist. LEXIS 220354 (D. Colo. Dec. 18, 2017), also considered a common fund award
5 in a RICO case, and also awarded one-third of the common fund as attorney’s fees. That
6 case also has distinctions: the decision was being made after a judgment (along with partial
7 settlements), and the analysis was performed under a different standard applied in the Tenth
8 Circuit. The Tenth Circuit later partially reversed class certification as to some defendants,
9 but did not address the award of attorney’s fees. *CGC Holding Co., Ltd. Liab. Co. v. Broad*
10 *& Cassel*, 773 F.3d 1076 (10th Cir. 2014). But in persuasive terms, the court there
11 considered several factors important in awarding the fee. First, “RICO cases are difficult.
12 At the beginning of the case defendants raised interesting and novel issues concerning the
13 reach of RICO....” *CGC Holding Co.*, 2017 U.S. Dist. LEXIS 220354 at *7. Second, “it is
14 difficult to understate the degree of opposition that plaintiffs’ counsel faced and ultimately
15 overcame in this case. The Hutchens defendants were represented by at least five different
16 law firms along the way. The case set new records for me in terms of motions, hearings,
17 orders, appeals, and scorched earth litigation.... One need only look at the docket entries,
18 numbering 889 entries as of December 15, 2017, to know why so many hours have been
19 required to prosecute (and defend) this case.” *Id.* at *9.

20 **III. A LODESTAR CROSS-CHECK SUPPORTS THE REQUESTED AWARD**

21 “In order to determine the lodestar figure, the Court calculates the number of hours
22 reasonably expended on the litigation and then multiplies that number by a reasonable
23 hourly rate.” *Heid* 2024 U.S. Dist. LEXIS 156801 at *31. “Moreover, ‘[t]he lodestar ‘cross-
24 check’ need not be as exhaustive as a pure lodestar calculation’ because it only ‘serves as a
25 point of comparison by which to assess the reasonableness of a percentage award.’” *Id.* at
26 *33-34 (quoting *Fernandez v. Victoria Secret Stores, LLC*, No. CV 06-04149 MMM (SHx),
27 2008 U.S. Dist. LEXIS 123546, 2008 WL 8150856, at *14 (C.D. Cal. July 21, 2008)).
28 “Accordingly, ‘the lodestar can be approximate and still serve its purpose.’” *Id.*

A. The Reasonable Hourly Rate

“The Court first considers whether Class Counsel's hourly rates are reasonable.” *Heid*, 2024 U.S. Dist. LEXIS 156801 at *31. “To assist the court in calculating the lodestar, a plaintiff must submit ‘satisfactory evidence...that the requested rates are in line with those prevailing in the community for similar services by lawyers of reasonably comparable skill, experience, and reputation.’” *Brown v. 22nd Dist. Agric. Ass'n*, No. 15-cv-2578-DHB, 2017 U.S. Dist. LEXIS 75439 at *37-38 (S.D. Cal. May 15, 2017) (quoting *Blum v. Stenson*, 465 U.S. 886, 895-96 n.11 104 S. Ct. 1541 (1984)). “The relevant community is that in which the district court sits.” *Brown*, 2017 U.S. Dist. LEXIS 75439 at *37. “Declarations regarding the prevailing market rate in the relevant community suffice to establish a reasonable hourly rate.” *Id.* Counsel propose the following rates as reasonable for the lodestar cross-check:

Kevin Kneupper	815
Cyclone Covey	815
Lorraine Weekes	445
Andrea Reed	445
Jarrett Faber	365
Bara Ahmad	295
Suzy Garcia	135
Elyssa Gerber	80

The relevant community here for the lodestar cross-check would be the Southern District of California. Other decisions from this District have approved of similar rates in class action lawsuits. In *Hartless v. Clorox Co.*, 273 F.R.D. 630, 644 (S.D. Cal. 2011), the court cited multiple cases holding that partner rates in class action cases ranged from \$475 to \$750 per hour and associate rates ranged from \$275 to \$425 per hour. The court then approved a rate of \$675 an hour for experienced attorneys and held that as of 2011, “based on the Court's familiarity with the rates charged by other firms in the San Diego area, the Court finds the rates charged by the attorneys and paralegals in this action reasonable.” *Id.*

1 In 2019—again, prior to the significant inflation in recent years—another court in this
2 District again collected cases on this issue. *Ronquillo-Griffin v. TransUnion Rental*
3 *Screening Sols., Inc.*, No. 17cv129 JM (BLM), 2019 U.S. Dist. LEXIS 79021 at *28 (S.D.
4 Cal. May 9, 2019). The court cited cases approving up to \$795 per hour for partners in class
5 actions. *Id.* It reviewed a table of hourly rates up to \$705 an hour for partners, and held that
6 “Counsel’s hourly rates are reasonable.” *Id.* at *27-28. More recently, a few weeks ago a
7 court in this District approved of class action rates ranging from \$525 to \$825 an hour.
8 *Fitzgerald*, 2024 U.S. Dist. LEXIS 195579 at *30-31. The court held that those rates “are
9 within the range normally charged within this legal community.” *Id.*

10 Another datapoint that is relevant to the market rate is what Class Counsel have
11 actually charged on an hourly basis in real-world markets. *Velez v. Roche*, No. C-02-0337
12 EMC, 2004 U.S. Dist. LEXIS 29848 at *23 (N.D. Cal. Sep. 22, 2004). Lead Class Counsel,
13 Kevin Kneupper and Cyclone Covey, primarily work on a contingent fee basis, but were
14 retained in 2024 to work on technology-related litigation on an hourly basis at a rate of
15 \$1,000 per hour for both attorneys. Decl. of K. Kneupper at ¶ 36. Mr. Kneupper was also
16 billed out at a rate of \$725 an hour to paying clients in the 2016 timeframe while working
17 at another law firm, McKool Smith, and while located in Austin, Texas. *Id.* These real-
18 world datapoints as to the prevailing market rate for Class Counsel’s services, given their
19 experience, supports the rates proposed for the lodestar cross-check.

20 Another data point as to reasonableness is the Laffey Matrix, a regularly-updated table
21 of suggested rates based on years of experience for attorneys in the Washington, D.C. area.³
22 Both Mr. Kneupper and Mr. Covey would fall in the range of attorneys with 11-19 years of
23 experience, with a suggested rate of \$948 per hour by the Laffey Matrix. While this does
24 not reflect rates in this community, some courts in this District have considered it
25 persuasive. *See Long v. Stanley Black & Decker, Inc.*, No. 14-CV-1246 JLS (BGS), 2015
26 U.S. Dist. LEXIS 53595 at *14 (S.D. Cal. Apr. 23, 2015); *Brown v. 22nd Dist. Agric. Ass’n*,

27
28 ³ The Laffey Matrix is maintained and regularly updated at: <http://www.laffeymatrix.com/see.html>.

1 No. 15-cv-02578-DHB, 2017 U.S. Dist. LEXIS 115321 at *15-16 (S.D. Cal. July 21, 2017).
2 Given the geographic difference, the Laffey Matrix cannot be considered dispositive, but it
3 is another datapoint suggesting that the rates for Class Counsel are reasonable.

4 Counsel for Plaintiff in this case are highly experienced in complex litigation. *See* Decl.
5 of K. Kneupper at ¶¶ 1-30; Decl. of C. Covey at ¶ 1-24. Counsel are further highly
6 experienced in consumer law cases, and the law firm of Kneupper & Covey currently
7 maintains a docket of over 350 active individual consumer law cases in either arbitration or
8 litigation. Decl. of K. Kneupper at ¶ 29. The law firm has settled or recovered judgments in
9 over 200 individual consumer law cases in 2023, and counsel are regularly involved in
10 numerous mediations or settlement discussions. *Id.* at ¶ 30. In 2023, these individually
11 settled or recovered cases by Kneupper & Covey amounted to more than \$2.5 million. *Id.*

12 **B. The Hours Expended**

13 “The Court next considers whether Class Counsel’s expenditure of [the submitted
14 number of] hours on this case is reasonable.” *Heid*, 2024 U.S. Dist. LEXIS 156801 at *33.
15 “The fee applicant bears the burden of documenting the appropriate hours expended in the
16 litigation and must submit evidence in support of those hours worked.” *Id.* (quoting *Gates*
17 *v. Deukmejian*, 987 F.2d 1392, 1397 (9th Cir. 1992)). “A district court ‘should defer to the
18 winning lawyer’s professional judgment as to how much time he was required to spend on
19 the case.’” *Id.* (quoting *Moreno v. City of Sacramento*, 534 F.3d 1106, 1112 (9th Cir. 2008)).
20 “It must also be kept in mind that lawyers are not likely to spend unnecessary time on
21 contingency fee cases in the hope of inflating their fees.... It would therefore be the highly
22 atypical civil rights case where plaintiff’s lawyer engages in churning.” *Moreno*, 534 F.3d
23 at 1112. “However, the Court ‘should exclude from [the] initial fee calculation hours that
24 were not ‘reasonably expended.’” *Heid*, 2024 U.S. Dist. LEXIS 156801 at *33 (quoting
25 *Hensley*, 461 U.S. at 434). “Hours are not ‘reasonably expended’ if they are ‘excessive,
26 redundant, or otherwise unnecessary.’” *Id.*

27 Counsel has submitted detailed billing records showing that the amount of time
28 expended to date on the case as a whole amounts to \$2,157,109.50 at the hourly rates above.

1 See Ex. 3, 4; see also *Ziegler v. GW Pharms., PLC*, No. 21-cv-1019-BAS-MSB, 2024 U.S.
2 Dist. LEXIS 52979 at *24 (S.D. Cal. Mar. 25, 2024) (submission of detailed billing records
3 satisfies lodestar burden). Separately, the amount of time expended since the Quick Box
4 settlement was signed amounts to \$563,678.50. Ex. 4.

5 C. The Cross-Check

6 The cross-check is performed by comparing the ultimate number billed to the
7 percentage of the fund request. In a lodestar cross-check, there is “no precise rule or
8 formula” for determining what hours to include or exclude, and “the court ‘necessarily has
9 discretion in making this equitable judgment.’” *Ziegler*, 2024 U.S. Dist. LEXIS 52979 at
10 *24. As discussed above, this cross-check is more complex with two settlements (but claims
11 that are intertwined), and a settlement with two potential final numbers.

12 There are several potential ways to calculate a cross-check. One cross-check would be
13 to compare the total number of hours billed for the combined settlements. In the “maximum
14 recovery” scenario—\$10.5 million in total—counsel’s one-third request would be \$3.5
15 million. This would put the multiplier at 1.62 (by dividing \$3,500,000 by \$2,157,109.50).
16 Another cross-check would be to compare the hours expended after settlement with Quick
17 Box to the Konnektive settlement alone. That would lead to a maximum fee award of
18 \$1,666,650 if Plaintiff wins the bench trial, and a multiplier of 2.95 (using \$1,666,650
19 divided by \$563,678.50). Further complicating the analysis is that a significant amount of
20 additional time will be necessarily be spent by counsel to prepare for and conduct a bench
21 trial—which can only decrease the multiplier, because the numerator (the award) has been
22 agreed to in the settlement.

23 As a starting point, Class Counsel believes that choosing a precise cross-check
24 methodology is largely be immaterial to the analysis. This is because multipliers of between
25 one and four are “commonly found to be appropriate” in a complex class action. *Id.* at *21.
26 Even a very conservative cross-check would result in a multiplier of 2.95 that would be
27 within this range (only applying the time post-settlement with Quick Box, which excludes
28 all work as to Konnektive from before then, and making no adjustment for the time that will

1 be spent on the bench trial). And treating the settlements as intertwined likewise results in
2 a 1.62 multiplier, which likewise will continue to decrease.

3 Class Counsel would further submit that any time spent as to the La Pura Parties was
4 necessary as to the Konnektive Parties, because the claims against the Konnektive Parties
5 either involve vicarious liability or a RICO conspiracy which would require proof of the
6 underlying allegations against the La Pura Parties. As to the Quick Box Parties, again, the
7 RICO claim here alleged that each were part of an enterprise with one another, and thus the
8 factual and legal issues are inextricably intertwined. But the Court need not delve into the
9 details of that issue here both because even very conservative methods do not reach a
10 multiplier of more than four, and because the Court is allowed significant leeway since the
11 point of the cross-check is for guidance, not mathematical certainty.

12 **IV. REASONABLE COSTS AND EXPENSES SHOULD BE AWARDED**

13 Class Counsel seeks costs of \$259,307.45, which are costs incurred after the date of
14 the Quick Box settlement, as well as further costs incurred to date for class notice expenses
15 related to Konnektive based on any final invoices for class notice, for a current total of
16 \$259,307.45. Ex. 5 at 4. “Reasonable costs and expenses incurred by an attorney who
17 creates or preserves a common fund are reimbursed proportionately by those class members
18 who benefit by the settlement.” *In re Packaged Seafood Prods. Antitrust Litig.*, No. 15-MD-
19 2670 DMS (MDD), 2022 U.S. Dist. LEXIS 150247 at *27-28 (S.D. Cal. Aug. 19, 2022)
20 (quoting *In re Media Vision Tech. Sec. Litig.*, 913 F. Supp. 1362, 1366 (N.D. Cal. 1995)).
21 “Such expense awards comport with the notion that the district court may ‘spread the costs
22 of the litigation among the recipients of the common benefit.’” *Id.* (quoting *Wininger v. SI*
23 *Mgmt. L.P.*, 301 F.3d 1115, 1121 (9th Cir. 2002)). “The prevailing view is that expenses
24 are awarded in addition to the fee percentage.” *In re Capacitors Antitrust Litig.*, No. 3:17-
25 md-02801-JD, 2018 U.S. Dist. LEXIS 169764 at *42 (N.D. Cal. Sep. 21, 2018) (quoting
26 *Williams v. SuperShuttle Int'l, Inc.*, No. 12-CV-06493-WHO, 2015 U.S. Dist. LEXIS
27 19341, 2015 U.S. Dist. LEXIS 19341, at *6 (N.D. Cal. Feb. 12, 2015)).
28

1 A non-exhaustive list of examples that another court in this District has found to
2 constitute reasonable costs include “1) meals, hotels, and transportation; 2) photocopies; 3)
3 postage, telephone, and fax; 4) filing fees; 5) messenger and overnight delivery; 6) online
4 legal research; 7) class action notices; 8) experts, consultants, and investigators; and 9)
5 mediation fees.” *In re Immune Response Sec. Litig.*, 497 F. Supp. 2d 1166, 1177-78 (S.D.
6 Cal. 2007) (finding “the expenses listed above to be reasonable and necessary”). As show
7 in Exhibits 5 and 6, Counsel have not sought expert expenses (because they were incurred
8 after the Quick Box Parties settled). The total costs to date in Exhibit 5 (including only those
9 incurred after settlement with Quick Box) are \$259,307.45.

10 Courts have routinely awarded amounts in the same range or exceeding what Class
11 Counsel is requesting here in complex class action lawsuits. *See In re Apple Inc. Device*
12 *Performance Litig.*, No. 5:18-md-02827-EJD, 2021 U.S. Dist. LEXIS 50546 at *46-47
13 (N.D. Cal. Mar. 17, 2021) (awarding \$995,244.93 in costs); *In re Capacitors Antitrust Litig.*,
14 2018 U.S. Dist. LEXIS 169764 at *53-54 (awarding \$6,690,000 in costs out of a
15 \$66,900,000 common fund, amounting to 10% of the recovered common fund); *In re*
16 *Immune Response*, 497 F. Supp. 2d at 1177 (awarding \$261,971.79 in costs); *In re Packaged*
17 *Seafood Prods.*, 2022 U.S. Dist. LEXIS 150247 at *28 (awarding \$2,507,500.25 in costs).

18 The costs submitted by Class Counsel reflect work in a complex RICO lawsuit that
19 had been ongoing for more than three years at the time of the settlement with the Quick Box
20 Parties. Class Counsel has excluded certain categories of costs that are not appropriate
21 because they would not ordinarily be billed to a client. One significant example that was
22 excluded is the development of the customized “archiver” software Counsel used in this
23 lawsuit, which cost roughly \$50,000, but which is more akin to an overhead expense in that
24 it can be re-used in other cases, and so was not included. Decl. of C. Covey at ¶ 30.

25 Class Counsel further expects that there will be additional costs with respect to Class
26 Notice. To the extent there are any further related expenses for Class Notice, Class Counsel
27 expects them to be available and calculable at or before the final approval hearing. In total
28 and at present, the requested expenses are \$259,307.45.

1 **V. THE COURT SHOULD GRANT A REASONABLE INCENTIVE AWARD**

2 On behalf of Ms. Tan, Class Counsel requests that she be awarded an incentive award
3 from the settlement with the Konnektive Parties of \$3,000 (in addition to the \$3,000 from
4 the proposed settlement with the Quick Box Parties). The total requested as an incentive
5 award for Ms. Tan will be \$6,000.

6 In its order granting preliminary approval at dkt. 483, the Court noted that the 9th
7 Circuit in *Radcliffe v. Experian Info. Sols.*, 715 F.3d 1157, 1163 (9th Cir. 2013) questioned
8 but did not determine “whether class representatives could be expected to fairly evaluate
9 whether awards ranging from \$26 to \$750 is a fair settlement value when they would receive
10 \$5,000 incentive awards.” Since the *Radcliffe* decision, various courts have held that
11 incentive awards of up to \$7,500 are presumptively reasonable. *See Vallejo v. Sterigenics*
12 *U.S., Ltd. Liab. Co.*, No. 20-cv-01788-AJB-AHG, 2023 U.S. Dist. LEXIS 216241 (S.D.
13 Cal. Dec. 5, 2023) (approving a service award of \$7,500 from a common fund of
14 \$1,020,430.15 and holding that “[t]he incentive award for the Class Plaintiff in this case is
15 presumptively reasonable”).

16 Only one court in this District appears to have specifically addressed the language
17 the Court cited in *Radcliffe*. *In re Illumina, Inc. Sec. Litig.*, No. 3:16-cv-3044-L-MSB, 2019
18 U.S. Dist. LEXIS 217596 at *18-20 (S.D. Cal. Dec. 18, 2019). In that case, the average
19 class member was expected to receive \$1.67, while the class representatives were being
20 awarded either \$25,000 or \$1,000 each. *Id.* The court noted that “the class representative
21 service awards amounts will be scrutinized upon motion for final approval.” *Id.* On the
22 preliminary approval motion, it held: “the maximum amount of incentive awards,
23 collectively, would equate to less than one percent of the total settlement amount. Each
24 payment is capped at a modest amount, and these awards merely compensate the class
25 representatives for the risk they assumed and the successful assistance they provided in this
26 case.” *Id.* While the court gave preliminary approval to the settlement, it issued a specific
27 directive for counsel to justify the role of the plaintiff who was to receive \$25,000. *Id.*

1 In other districts, courts have approved of settlement awards after considering the 9th
2 Circuit authority cited by the court. In *Spann v. J.C. Penney Corp.*, 314 F.R.D. 312, 328-29
3 (C.D. Cal. 2016), the court considered the same case law cited by this Court as to a \$10,000
4 incentive award with a \$50 million common fund. The court was again granting preliminary,
5 not final, approval, but held: “the court does not believe, under the circumstances here, that
6 such disparity rises to the level of unduly preferential treatment.” *Id.* This was in part
7 because it was a small portion of the settlement fund, and in part because “it is clear that the
8 plaintiff in this action has taken on substantial responsibility in litigating this case, and the
9 class has benefitted from the time and effort she spent doing so.” *Id.* Other courts have
10 agreed. See *In re Yahoo! Inc. Customer Data Sec. Breach Litig.*, No. 16-MD-02752-LHK,
11 2020 U.S. Dist. LEXIS 129939 at * 31-35 (N.D. Cal. July 22, 2020) (approving \$5,000 and
12 \$7,500 incentive awards where the average class member would receive \$40 to \$50).

13 Another court, *Aguilar v. Wawona Frozen Foods*, No. 1:15-cv-00093-DAD-EPG,
14 2017 U.S. Dist. LEXIS 4320 at *24-26 (E.D. Cal. Jan. 11, 2017), interpreted *Radcliff* to be
15 primarily concerned with situations with a **negotiated** incentive award in the settlement. In
16 such a situation, as *Radcliff* stated, “if the class representatives had concerns about the
17 settlement's fairness, they could either remain silent and accept the \$5,000 awards or object
18 to the settlement and risk getting as little as \$26 if the district court approved the settlement
19 over their objections.” *Radcliffe*, 715 F.3d at 1165. But in *Aguilar*—as in this case—that
20 situation did not exist: “This settlement agreement, however, does not condition receipt of
21 any incentive awards on support of the settlement, and merely indicates plaintiffs will apply
22 to the court for such payments.” *Aguilar*, 2017 U.S. Dist. LEXIS 4320 at *24-26.

23 The background facts in the *Radcliffe* opinion make clear that it was not the size of
24 the incentive award, but its negotiation as part of the settlement which caused it to hold that
25 “the incentive awards here corrupt the settlement....” *Radcliffe*, 715 F.3d at 1164. “The
26 settlement agreement explicitly conditions the incentive awards on the class representatives'
27 support for the settlement.” *Id.* “Counsel told a plaintiff below that he would ‘not be entitled
28 to anything’ and that he would ‘jeopardize the \$5,000 [he] would receive [under the

1 settlement]’ if he did not support the settlement. Class counsel also told the district court
2 that they had told other plaintiffs that they ‘don’t see a way for people who don’t support the
3 settlement to receive an incentive award.’” *Id.* at 1164-65. And even where *Radcliffe*
4 criticizes the disparate size of the incentive awards, it repeatedly attributes the problem to
5 “the incentive-awards agreements,” and even makes clear in that section that: “Here, our
6 analysis focuses on the agreement.” *Id.* at 1166. “That Objecting Plaintiffs could have
7 petitioned for incentive awards is irrelevant to the conflict **created by the settlement**
8 **agreement.**” *Id.* (emphasis added).

9 Like in *Aguilar*, the proposed settlement here did not make any agreement as to the
10 incentive award, its size, or condition it on approval, but instead left the issue to the Court.
11 Unlike in *Radcliffe*, Class Counsel have not told Ms. Tan that she would not be entitled to
12 anything if she objected to the settlement, have not told her that she would jeopardize the
13 settlement by not supporting it, and have not told her that she must support this settlement
14 to receive an incentive award. Decl. of K. Kneupper at ¶ 37. This means the concern
15 expressed in *Radcliff*—that Ms. Tan might feel pressured to accept the settlement or lose
16 out on an agreed incentive award that was higher than what she would receive as a class
17 member—does not exist. Instead, she agreed to a settlement with no requirement that she
18 receive an incentive award at all unless the Court decided to award one. The settlement here
19 is likewise silent as to the amount of Class Counsel’s attorney’s fees and expressly leaves
20 both issues to the Court. The settlement here was intentionally drafted this way to avoid the
21 kinds of conflicts and risks of collusion that frequently exist in the class action context. By
22 contrast, in *Radcliff*, the 9th Circuit believed the settlement was designed not to avoid
23 collusion or conflicts, but to use threats relating to the incentive award to pressure class
24 representatives into accepting the terms.

25 With respect to evaluating the incentive award, the 9th Circuit examines “the number
26 of named plaintiffs receiving incentive payments, the proportion of the payments relative to
27 the settlement amount, and the size of each payment.” *In re Illumina, Inc. Sec. Litig.*, 2019
28 U.S. Dist. LEXIS 217596 at *19 (citing *Staton v. Boeing Co.*, 327 F.3d 938, 977 (9th Cir.

1 2003)). Ms. Tan here is the only Plaintiff who would be receiving an award. A \$3,000
2 incentive award under the settlement with the Konnektive Parties would be less than a
3 quarter of a percent of the common fund regardless of whether the bench trial results in a
4 \$2 million common fund or a \$5 million common fund—around the “less than a quarter of
5 one percent” that caused the *Spann* court to consider any disparity a non-issue. *Spann*, 314
6 F.R.D. at 329. And the size of the payments to the class members again are an important
7 distinction because here, class members were signed up for recurring subscriptions. Each
8 month—until they discovered the undisclosed subscription—class members were billed for
9 roughly \$200. Some class members were billed for six months or more (meaning they would
10 have been billed \$1,200 or more in unauthorized shipments). Decl. of K. Kneupper at ¶ 38.
11 Unless all class members submit claims, these damages may be trebled, meaning some class
12 members may be entitled to \$3,600 or more—eliminating any disparity.

13 Finally, Ms. Tan has spent more than four years diligently representing the Class. She
14 refused to abandon the case even when personally threatened with paying the Defendants’
15 attorneys’ fees under a sanctions motion. Dkts. 109, 110, 111. Class Counsel has not located
16 any other class representatives, in any other class action, ever, who have been threatened
17 with such sanctions personally, let alone on the grounds that her attorneys (not her)
18 supposedly did no investigation before filing the case—and yet Ms. Tan persisted. She sat
19 for a deposition and will likely testify at a bench trial if the settlement with the Konnektive
20 Parties is approved. Decl. of K. Kneupper at ¶ 39. The proposed award is justified given the
21 commitment Ms. Tan has shown to protecting the Class.

22 VI. CONCLUSION

23 Plaintiff respectfully requests an award of one-third of the settlement, amounting to
24 either \$666,666 or \$1,666,666 in attorney’s fees depending on the results of the bench trial,
25 as well as \$259,307.45 in costs and expenses to Kneupper & Covey, PC, to be updated about
26 class notice costs by the hearing date, and a \$3,000 incentive award to Ms. Tan.

27
28 DATED: December 23, 2024

KNEUPPER & COVEY, PC

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/s/Kevin M. Kneupper
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

LEANNE TAN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

QUICK BOX, LLC et al,

Defendants.

Case No.: 3:20-cv-1082-LL-DDL

**DECLARATION OF CYCLONE
COVEY IN SUPPORT OF
PLAINTIFF’S MOTION FOR
ATTORNEYS’ FEES, COSTS, AND
INCENTIVE AWARD**

Date: February 6, 2025
Time: *
Ctrm: 2B
Judge: Hon. Linda Lopez

*PER CHAMBERS RULES, NO ORAL
ARGUMENT UNLESS SEPARATELY
ORDERED BY THE COURT

Complaint Filed: June 12, 2020

1 I, A. Cyclone Covey, do hereby declare as follows:

2 1. I am a partner at Kneupper & Covey PC, counsel of record for Plaintiff
3 LeAnne Tan. I am licensed to practice law in the States of California and Georgia. I make
4 this declaration to the best of my knowledge, information, and belief of the facts stated
5 herein.

6 2. I earned my B.S. in Computer Science from Wake Forest University in 2000,
7 graduating in three years.

8 3. While earning my undergraduate degree at Wake Forest I was a member of
9 the school's debate team. In my third and final year as an undergraduate I was on Wake
10 Forest's top two-person debate team and our team was ranked nationally in the Top 10 in
11 the country.

12 4. I graduated from Wake Forest University School of Law in 2003, with *Cum*
13 *Laude* honors. During my time at Wake Forest Law I was a member of Law Review and
14 co-captain of the school's National Trial Team. As a 2L I individually won the school's
15 internal Mock Trial competition.

16 5. From 2003 through 2006 I worked for the law firm of Griffin, Cochrane, and
17 Marshall in Atlanta, GA. This firm specialized in complex commercial construction
18 disputes.

19 6. Despite being out of law school for less than two years, in 2005 the partners
20 at Griffin, Cochrane, and Marshall selected me to be second chair in a two-week jury trial
21 representing the plaintiff in *Maschke Associates v. Beers Moody*, SUCV1999000110, in
22 Georgia Superior Court of Dougherty County, which was litigated to its conclusion.

23 7. That same year I was also selected to act as lead counsel in a complex
24 commercial arbitration dispute, which settled midway through arbitration.

25 8. I worked on numerous other cases, including other multimillion dollar
26 complex construction cases in Federal and state courts throughout the country. My cases
27 also included breach of product warranty, defamation, and other claims related to complex
28 commercial disputes.

1 9. In 2006 I left Griffin Cochrane & Marshall to serve at the Director of
2 Operations and General Counsel for Verastar, a regional wholesale auto auction company.
3 I retained that role until Verastar was sold to Insurance Auto Auctions in 2008. I was
4 Verastar's negotiator during the process of consummating the transaction. Pursuant to the
5 terms of the deal I acted as a consultant to Insurance Auto Auctions until the end of 2008.

6 10. In 2009 I became the COO and General Counsel for Clearwave Corporation,
7 which sells health insurance verification software to health providers. During my time at
8 Clearwave I was responsible for the company's legal compliance on issues ranging from
9 employment law to HIPAA compliance to negotiation of and compliance with many
10 nondisclosure agreements. As COO I was also responsible for overseeing the company's
11 software development team.

12 11. In 2011, I left Clearwave corporation to co-found several businesses, which
13 include, TriStar Recycling & Metals (scrap metal recycling), AgileLaw (software for
14 lawyers in depositions), ClickChefs fka Christophe's Gourmet (food production and
15 delivery), Valens Global (counterterrorism consulting), Momentum Video (video
16 production), the Hirsch Collection (wine importing), and Valens Games (wargaming
17 simulation software). TriStar, AgileLaw, Valens Games, and Valens Global are still
18 operational and I have served as their general counsel for all manner of legal issues, which
19 present themselves on a regular basis. I am also involved in the website programming,
20 development and maintenance for TriStar and AgileLaw.

21 12. In 2016 I successfully defended a claim against Christophe's Gourmet that
22 was filed in Georgia Superior Court. My efforts resulted in the plaintiff dismissing its
23 claims before trial without a settlement.

24 13. During my undergraduate schooling at Wake Forest while pursuing my
25 Computer Science Bachelor's degree and during my time working with the numerous
26 companies list above, I have learned about many of the technical aspects of computer
27 programming, including writing and interpreting HTML, CSS, SQL, and JavaScript. I
28 have been involved in the programming and development of at least 15 commercial

1 websites and I have personal knowledge and experience on the following: hosting websites,
2 running e-commerce platforms, using various social media sites to advertise to consumers,
3 the methods and systems that e-commerce companies use to track their website visitors and
4 the customers, how to sell products on Amazon.com, how to archive or “save” an online
5 web page, the workings of relational databases (which typically store transactions), and
6 many tricks that unscrupulous e-commerce platform operators can use to manipulate data.

7 14. In 2019, I formed Kneupper & Covey PC with my partner Kevin Kneupper to
8 pursue consumer law claims.

9 15. I have represented or currently represent consumers in seven consumer class
10 action cases since starting our firm. For example, I am currently co-counsel in *McKinney*
11 *v. Corsair Gaming, Inc.*, No. 3:22cv312 (N.D. Cal.), a case alleging that RAM products
12 used for gaming were sold using various misrepresentations and omissions related to
13 “overclocking” of the chip speeds. Our firm partnered with Dovel & Luner, a highly
14 respected consumer law firm, to pursue those claims. As another example, three of our
15 other class action suits targeted the “free trial scam,” a long-running scam which has
16 plagued consumers online in which they are signed up for fake free trials, but then billed
17 hundreds of dollars every month that they never agreed to. Using methods ranging from
18 source code and server analysis to a John Doe lawsuit with subpoenas, we have
19 successfully identified a number of participants who have been engaging in the scam for
20 years without being caught and had gone to great lengths to hide themselves. Through our
21 firm I oversaw the development of customized software designed to archive websites to
22 preserve evidence of these scams. I also used a customized “crawler” which automatically
23 searched online to locate websites that were utilizing certain telltale code signatures that
24 indicated that the websites were using software that included “load balancer” functionality
25 which rotates merchant accounts from various shell companies as part of credit card
26 laundering schemes commonly used in these scams.

1 16. I have used my experience in software development to not only develop
2 software for use in gathering evidence, but in assisting our firm in this case in investigating
3 the hidden webpages used to sell the products at issue here.

4 17. I have further represented hundreds of individual consumers in various
5 consumer protection cases. Along with my partner, I have been in charge of three mass
6 arbitrations, in which we have filed large numbers of arbitration claims against the same
7 defendants. The first of these has settled and the details are confidential, but involved
8 around 100 consumers. That mass arbitration involved cases around the country and
9 involved claims brought under the consumer laws of more than 30 states.

10 18. The second mass arbitration was against Vroom, an online car dealer, under
11 warranty claims that generally involve a failure to provide title to purchasers of cars. I
12 represented roughly 200 consumers in that mass arbitration, and the bulk of them involved
13 Texas's Deceptive Trade Practices Act (an analogue consumer statute to California's
14 CLRA). Those claims also involved breach of warranty and UCC claims, the federal
15 Magnuson-Moss Warranty Act, and breach of the warranty of title. Many of our clients
16 had been unable to drive their cars for months (or even years) at a time due to the risk of
17 impoundment or arrest. I developed customized software to help manage this mass
18 arbitration process and streamline tasks associated with it, enabling us to represent
19 consumers more effectively and more cheaply. Our firm successfully resolved the mass
20 arbitration prior to Vroom winding down and going out of business.

21 19. The third mass arbitration is currently ongoing and involves consumers
22 injured by now-bankrupt solar companies, including a company called Pink Energy. Our
23 firm represents numerous consumers against financing companies such as Goodleap,
24 Sunlight Financial, and Dividend who financed rooftop solar power installations. The
25 claims involve state agency law of various states, the federal Magnuson-Moss Warranty
26 Act, and the consumer protection laws of various states.

27 20. I have represented a number of different consumers in individual arbitrations
28 as well. For example, I have represented several elderly consumers who were sold solar

1 panel systems via deceptive and fraudulent means as part of schemes to impose liens on
2 their homes to collect money whenever they passed. I have represented a number of
3 consumers in EFTA/TILA claims where banks have failed to reverse fraudulent
4 transactions on their accounts. Among these claims, I represented an individual who lost
5 his business and became homeless living in a truck along with his four-year old daughter
6 and obtained a satisfactory settlement.

7 21. I have also represented numerous individual consumers in state court, federal
8 court, and small claims court in both Georgia and California. For example, I represented
9 and obtained a satisfactory settlement for a consumer whose house was sold at a tax auction
10 when a financing company failed to pay taxes they were obligated to as part of a fraudulent
11 scheme. I have represented consumers in multiple breach of warranty claims. I helped a
12 consumer who had been without an air conditioner for more than a year (suffering through
13 the Georgia summers) to recover compensation and to fix her home's air conditioning
14 system. I helped a consumer recover compensation for serious injuries to her family's pet
15 dog from a consumer product. I have represented and obtained a satisfactory settlement for
16 an elderly consumer who transferred a large portion of his life savings via wire transfer to
17 a scammer overseas and whose bank did nothing to stop it despite multiple red flags.

18 22. On November 15, 2024, I concluded a jury trial on behalf of one of our clients
19 in state court in Fulton County, Georgia. The jury awarded \$307,000 to our client, who had
20 purchased a car from a car dealership that turned out to have had the VIN plate removed.
21 The jury found that our client had suffered significant emotional distress damages after
22 being incorrectly arrested on felony charges after he was pulled over and police believed
23 the car was stolen. I second-chaired the trial, along with Jarrett Faber, an attorney at our
24 firm who first-chaired the trial.

25 23. My efforts to represent consumers have received media attention. For
26 example, I was featured on Action 9 News, a local television in Charlotte, North Carolina
27 to discuss our efforts to get the titles for consumers who had purchased cars from Vroom.
28 Jason Stugenke, *'A rat race' Driver blames Vroom for license plate issues*, WSOC-TV

1 (June 2, 2022), available at <https://www.wsocvtv.com/news/local/rat-race-driver-blames->
2 [vroom-license-plate-issues/JUU_NBEIL5HDNHQ3QAPTYU4FE4/](https://www.wsocvtv.com/news/local/rat-race-driver-blames-vroom-license-plate-issues/JUU_NBEIL5HDNHQ3QAPTYU4FE4/). I was also featured
3 on ABC News Atlanta in a case in which I obtained a settlement as well as a \$52,000
4 contempt of court fine against an apartment complex which had constructively evicted my
5 clients. Justin Gray, *Brother, sister win lawsuit against metro Atlanta landlord accused of*
6 *damaging their credit*, WSB-TV (September 12, 2022), available at
7 <https://www.wsbtv.com/news/local/fulton-county/brother-sister-win-lawsuit-against->
8 [metro-atlanta-landlord-accused-damaging-their-](https://www.wsbtv.com/news/local/fulton-county/brother-sister-win-lawsuit-against-metro-atlanta-landlord-accused-damaging-their-credit/4RGRQCHOMRFP5PXB_TKVUHPQ54/)
9 [credit/4RGRQCHOMRFP5PXB_TKVUHPQ54/](https://www.wsbtv.com/news/local/fulton-county/brother-sister-win-lawsuit-against-metro-atlanta-landlord-accused-damaging-their-credit/4RGRQCHOMRFP5PXB_TKVUHPQ54/).

10 24. At any given time, Kneupper & Covey represents more than 200 clients in
11 active matters in consumer law cases. Our firm currently employs five full-time litigating
12 attorneys (other than Mr. Kneupper and myself).

13 25. To calculate potential damages I used the excel spreadsheet provided by
14 Konnektive (Exhibit 1 to Tom Knuth Declaration - Excerpt of RMG's CRM Data for La
15 Pura Transactions [Filed in Native]). To ensure I could properly analyze the spreadsheet I
16 set up a MySQL database on server and imported all of the data from the Konnektive Excel
17 spreadsheet into the SQL database. SQL is a database that stores data in tables, columns,
18 and rows, which is the same logical layout that Excel uses.

19 26. In many ways a SQL database is more powerful than Excel because it allows
20 the user to run queries to filter and query the data in ways that cannot be done in Excel.

21 27. I have extensive experience with SQL. I took a SQL class while earning my
22 computer science degree at Wake Forest and I then obtained a MS SQL certification from
23 the Learning Tree continuing education classes in the early 2000's. I used SQL extensively
24 to analyze tens of thousands of transactions during my time at Veristar and I continue to
25 monitor and use SQL databases today, including a SQL database that TriStar Recycling &
26 Metals uses for its day-to-day operations. Our law firm, Kneupper & Covey also uses a
27 SQL database for some of its internal processes.

1 28. The Konnektive dataset I used contains many columns. One column is
2 labelled “Refunded” and another is labelled “ChargedBack”. The “Refunded” and
3 “ChargedBack” appear to indicate when an initial charge was reversed either via a refund
4 or chargeback. For all rows in the dataset, the “ChargedBack” and “Refunded” columns
5 contained either a 0 (zero) or 1 (one). In programming “one” indicates “true” and “zero”
6 indicates “false.” Based on this convention it appears that any row with a “one” in the
7 “Refunded” column means that the charge on that row was refunded. The same logic
8 applies to the “ChargedBack” column: a “one” indicates the transaction was charged back.
9 Another column is labelled “Amount”, which are floating point (decimal) numbers. There
10 are no negative numbers in the “Amount” field.

11 29. To obtain the total in damages I ran a SQL query that totaled the “Amount”
12 field but excluded all rows where either “Refunded” or “ChargedBack” (or both) had a
13 value of “one”. This query is intended to show all La Pura charges net of all refunds and
14 chargebacks. The result of this query was 6,402,828.77, which is what we calculate the
15 damages claim to be. To check my work I ran another SQL query on the total “Amount”
16 field without excluding “Refunded” or “ChargedBack”, which should show a greater
17 number because it includes all charges. The result of that query was 7,630,128.88. This
18 analysis was later confirmed by an expert witness with a background in accounting who
19 submitted an expert report.

20 30. As part of this lawsuit and the others we were pursuing against the affiliate
21 marketing industry, I had to develop software customized to download and preserve the
22 evidence at issue. I designed the functionality for this software and Kneupper & Covey
23 hired a software developer to create this software based on my design, which we used
24 extensively in this case. I estimate the cost was at least \$50,000.

1 I declare and state under penalty of perjury pursuant to the laws of the State of
2 California that the foregoing is true and correct, and that this Declaration was executed this
3 23rd day of December, 2024 in Vail, Colorado.

4
5 /s/ A. Cyclone Covey

6 A. Cyclone Covey, Esq.
7 Declarant
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KNEUPPER & COVEY, PC
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*Attorneys for Plaintiff LeAnne Tan
and the putative Class*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

LEANNE TAN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

QUICK BOX, LLC, et al,

Defendants.

Case No.: 3:20-cv-1082-LL-DDL

**DECLARATION OF KEVIN
KNEUPPER IN SUPPORT OF
PLAINTIFF’S MOTION FOR
ATTORNEYS’ FEES, COSTS, AND
INCENTIVE AWARD**

Date: February 6, 2025
Time: *
Ctrm: 2B
Judge: Hon. Linda Lopez

*PER CHAMBERS RULES, NO ORAL
ARGUMENT UNLESS SEPARATELY
ORDERED BY THE COURT

Complaint Filed: June 12, 2020

1 I, Kevin M. Kneupper, do hereby declare as follows:

2 1. I am a partner at Kneupper & Covey PC, counsel for LeAnne Tan. I am
3 licensed to practice law in the States of California and Texas. I make this declaration to the
4 best of my knowledge, information, and belief of the facts stated herein.

5 2. I am highly experienced in complex litigation, in particular litigation
6 involving technological issues. I am further highly experienced in consumer protection
7 litigation, both in individual cases and in class actions.

8 3. I graduated from the University of Texas School of Law in 2005, ranked 4th
9 in my class of more than five hundred students. From 2005 through 2007 I clerked for the
10 Honorable Judge James L. Dennis on the Fifth Circuit Court of Appeals. I was recognized
11 by name in an *en banc* Fifth Circuit opinion for my contributions as a clerk to work on a
12 complex series of death penalty cases. *Nelson v. Quarterman*, 472 F.3d 287, 316 n.1 (5th
13 Cir. 2006) (Dennis, J., concurring).

14 4. From 2007 through 2016 I worked for the law firm of McKool Smith PC, and
15 was ultimately a principal in the firm. McKool Smith is one of the most highly regarded
16 plaintiff's law firms in the country, and is particularly known for its strength in complex
17 technological cases. I worked on a number of lawsuits there, a selection of which are
18 discussed below, and was a member of the trial team in eight complex lawsuits that went
19 to jury trials.

20 5. I represented Versata and was a member of the trial team in *Versata Software,*
21 *Inc. Et Al v. SAP America, Inc. et Al*, 2:07-cv-153 in the Eastern District of Texas, a patent
22 infringement case involving enterprise software called a "pricer" that automated price
23 determinations and discount applications. There were two trials in the case—a first trial in
24 which Versata won \$139 million in damages, and after an intervening change in Federal
25 Circuit law on the calculation of damages, a \$345 million verdict in a separate retrial of the
26 damages issues. I represented Versata in both trials and managed a team of attorneys in the
27 retrial of damages.

1 6. I represented Versata and was a member of the trial team in *Autodata*
2 *Solutions, Inc. v. Versata Software, Inc. et al*, 2:12-cv-704 in the Eastern District of Texas,
3 a patent infringement case involving enterprise software. I managed discovery in the case
4 and presented one of the key witnesses at trial.

5 7. I represented Versata and was a member of the trial team in *Versata Software,*
6 *Inc. et al v. Sun Microsystems, Inc.*, 2:06-cv-358 in the Eastern District of Texas, a patent
7 infringement case involving enterprise software called a “configurator” that automatically
8 configured the parts used in manufacturing by large corporations as product designs are
9 changed.

10 8. I represented KeyBank and was a member of the trial team in *Datatreasury*
11 *Corporation v. Wells Fargo & Company et al*, 2:06-cv-72 in the Eastern District of Texas,
12 a patent infringement case involving check imaging technology. The case settled mid-trial.

13 9. I represented Unwired Planet in *Unwired Planet, LLC v. Apple, Inc.*, 3:13-cv-
14 4134 in the Northern District of California, a patent infringement lawsuit involving a
15 number of technologies relating to mobile phones. I was in charge of managing the case
16 and leading the discovery team. I further participated in the technical analysis of various
17 iPhone features, including Siri and the gyroscopic technology used in the iPhone.

18 10. I represented Halliburton in *Myklatun et al v. Halliburton Energy Services Inc*
19 *et al*, 5:09-cv-770 in the Western District of Oklahoma, a breach of contract and tortious
20 interference case involving microemulsion technology, a chemical used to enhance oil well
21 production. I managed the lawsuit in its entirety for much of the case, and after successfully
22 excluding the damages expert for Myklatun on *Daubert*, my client settled its portion of
23 case the night before the first day of trial.

24 11. I represented Rambus, Inc. in *Rambus, Inc. v. Hynix Semiconductor, Inc. et*
25 *al*, and was part of the trial team in a jury trial in the Northern District of California. The
26 case involved DRAM technology, a kind of memory used in computers.

27 12. I was a member of a technical team analyzing the Deepwater Horizon oil spill
28 incident and its causes for Halliburton as part of the Deepwater Horizon litigation.

1 13. I represented Parkervision in *Parkervision, Inc. v. Qualcomm Incorporated*,
2 3:11-cv-719 in the Middle District of Florida, a patent infringement case involving cell
3 phone signal downconversion technology. I was a member of the trial team which obtained
4 a jury verdict of \$173 million in damages on behalf of Parkervision.

5 14. I represented Solid State Storage Solutions in *Solid State Storage Solutions,*
6 *Inc. v. Stec, Inc. et al*, 2:11-cv-391, in a patent infringement case involving hard drive
7 technology. I led discovery efforts and was in charge of brief writing.

8 15. I have worked on numerous other cases, including in shareholder litigation
9 and other patent infringement and complex business litigation.

10 16. From 2016 through 2018 I spent a sabbatical writing novels, short stories, and
11 screenplays.

12 17. In mid-2018 I began studying class action law and consumer law in
13 preparation to found my own law firm.

14 18. In August 2019, I formed Kneupper & Covey PC and am a founding partner
15 in the firm.

16 19. I have represented or currently represent consumers in numerous consumer
17 class action cases since starting our firm. For example, I am currently co-counsel in
18 *McKinney v. Corsair Gaming, Inc.*, No. 3:22cv312 (N.D. Cal.), a case alleging that RAM
19 products used for gaming were sold using various misrepresentations and omissions related
20 to “overclocking” of the chip speeds. Our firm partnered with Dovel & Luner, a highly
21 respected consumer law firm, to pursue those claims. As another example, two of our other
22 class action suits targeted the “free trial scam,” a long-running scam which has plagued
23 consumers online in which they are signed up for fake free trials, but then billed hundreds
24 of dollars every month that they never agreed to. Using methods ranging from source code
25 and server analysis to a John Doe lawsuit with subpoenas, we have successfully identified
26 a number of participants who have been engaging in the scam for years without being
27 caught and had gone to great lengths to hide themselves. Our firm developed customized
28 software designed not only to archive websites to preserve evidence of these scams, but we

1 developed a “crawler” which automatically searched online to locate websites that were
2 utilizing a kind of illegal software called a “load balancer” which rotates merchant accounts
3 from various shell companies as part of credit card laundering schemes commonly used in
4 these scams. We also represent clients in another class action targeting a “free bottle” scam
5 in which consumers were defrauded into believing they were receiving free bottles of Keto
6 diet pills.

7 20. Our “free trial scam” lawsuits have resulted in the defendants in one of our
8 cases being named as unindicted co-conspirators in a criminal indictment in the Southern
9 District of New York. Our investigation and lawsuit revealed that those Defendants were
10 also helping operate an investment scam to defraud investors in a publicly traded cannabis
11 company on the Canadian stock exchange.

12 21. I have further represented hundreds of individual consumers in various
13 consumer protection cases. Along with my partner, A. Cyclone Covey, I have been in
14 charge of three mass arbitrations, in which we have filed large numbers of arbitration
15 claims against the same defendants. The first of these has settled and the details are
16 confidential, but involved around 100 consumers. That mass arbitration involved cases
17 around the country and involved claims brought under the consumer laws of more than 30
18 states.

19 22. The second mass arbitration was against Vroom, an online car dealer, under
20 warranty claims that generally involve a failure to provide title to purchasers of cars. I
21 represented roughly 250 consumers in that mass arbitration, and the bulk of them involved
22 Texas’s Deceptive Trade Practices Act (an analogue consumer statute to California’s
23 CLRA). Those claims also involve breach of warranty and UCC claims, the federal
24 Magnuson-Moss Warranty Act, and breach of the warranty of title. Many of our clients
25 had been unable to drive their cars for months (or even years) at a time due to the risk of
26 impoundment or arrest. Our firm’s efforts to force Vroom to properly title the cars it sold
27 to our clients have been featured in multiple media outlets. *See Justin Gray, Vroom*
28 *customers say months after buying cars, they still can’t legally drive them*, WSB-TV (June

1 29, 2022), available at <https://www.wsbtv.com/news/local/vroom-customers-say-months->
2 [after-buying-cars-they-still-cant-legally-drive-](https://www.wsbtv.com/news/local/vroom-customers-say-months-after-buying-cars-they-still-cant-legally-drive-them/JGNL_7X26FBIJG32MPALCO2HUE/)
3 [them/JGNL_7X26FBIJG32MPALCO2HUE/](https://www.wsbtv.com/news/local/vroom-customers-say-months-after-buying-cars-they-still-cant-legally-drive-them/JGNL_7X26FBIJG32MPALCO2HUE/), Jason Stugenke, *'A rat race' Driver*
4 *blames Vroom for license plate issues*, WSOC-TV (June 2, 2022), available at
5 [https://www.wsoctv.com/news/local/rat-race-driver-blames-vroom-license-plate-](https://www.wsoctv.com/news/local/rat-race-driver-blames-vroom-license-plate-issues/JUU_NBEIL5HDNHQ3QAPTYU4FE4/)
6 [issues/JUU_NBEIL5HDNHQ3QAPTYU4FE4/](https://www.wsoctv.com/news/local/rat-race-driver-blames-vroom-license-plate-issues/JUU_NBEIL5HDNHQ3QAPTYU4FE4/); Karin Price Mueller, *He bought a car*
7 *from Vroom, but 2 years later he still doesn't have the title. Now it's in an impound lot*,
8 NJ.COM (Sept. 26, 2022), available at [https://www.nj.com/news/2022/09/he-bought-a-](https://www.nj.com/news/2022/09/he-bought-a-car-from-vroom-but-2-years-later-he-still-doesnt-have-the-title-now-its-in-an-impound-lot.html)
9 [car-from-vroom-but-2-years-later-he-still-doesnt-have-the-title-now-its-in-an-impound-](https://www.nj.com/news/2022/09/he-bought-a-car-from-vroom-but-2-years-later-he-still-doesnt-have-the-title-now-its-in-an-impound-lot.html)
10 [lot.html](https://www.nj.com/news/2022/09/he-bought-a-car-from-vroom-but-2-years-later-he-still-doesnt-have-the-title-now-its-in-an-impound-lot.html),

11 23. Our firm is also pursuing a third mass arbitration involving a bankrupt solar
12 panel provider, Pink Energy, which was accused of a number of improper and fraudulent
13 practices affecting tens of thousands of people. Many of those people have non-functioning
14 solar power systems as a result, or were never compensated for fraudulent sales
15 representations or damage to their homes during installation. We have onboarded a number
16 of clients to pursue the lenders under the FTC Holder Rule. As a result of my work trying
17 to protect victims of fraudulent practices in the solar power industry, I was interviewed by
18 Time Magazine. See Alana Semuels, *Rooftop Solar Power Has a Dark Side*, TIME, Sept.
19 26, 2023, available at <https://time.com/6317339/rooftop-solar-power-failure/>. We have
20 successfully rescinded more than \$1 million of improper solar loans in 2024 alone on
21 behalf of our clients through arbitration victories or settlements.

22 24. I have represented a number of different consumers in individual arbitrations
23 as well. For example, I have represented a consumer with non-functioning solar panels who
24 were being billed using faked power generation data or consumers whose solar panels were
25 improperly installed resulting in damage to their homes. I regularly represent consumers in
26 arbitrations under EFTA or TILA involving banks who refuse to conduct a proper
27 investigation of fraud claims or credit their accounts.

28 25. I also routinely represent individual consumers in California in both state and

1 federal court. For example, I have represented a consumer who was sold a vehicle service
2 contract by a company that refused virtually all car repairs from its customers and
3 consumers who were sold programming courses for tens of thousands of dollars but ended
4 up with shoddy and overhyped course materials. I have represented consumers against
5 unfair debt collection efforts under both the Fair Debt Collection Practices Act and the Fair
6 Credit Reporting Act. I have represented a consumer faced with a 90% interest loan whose
7 bank accounts were being garnished even after she had paid far more than the original
8 principal, and I succeeded in lifting a default judgment that had been issued more than five
9 years earlier by proving that the metadata in contemporaneous photographs she took
10 showed that the affidavit of service was false because she was not at home at the time five
11 years earlier. I have also represented an elderly consumer who was deceived into
12 purchasing solar panels (and whose contract was signed by the salesperson).

13 26. I have represented consumers not only under the main California consumer
14 protection statutes (the Consumer Legal Remedies Act (“CLRA”), the Unfair Competition
15 Law (“UCL”), and the False Advertising Law (“FAL”), but have also represented
16 consumers from other states in numerous arbitrations under various state consumer
17 protection laws.

18 27. As part of my writing hobby, I filed a *pro se* trademark challenge against a
19 trademark on the word “cocky” which was being asserted against various romance
20 novelists who used the word in the titles of their books. The challenge resulted in the
21 cancellation of the trademark and ensured that authors of romance novels could use the
22 word freely without risk of legal action against them.

23 28. My efforts to protect consumers and others have received international media
24 attention in a variety of news publications, including CNBC, Newsweek, Courthouse
25 News, Bloomberg, Vox, The Guardian, Slate, The Daily Mail, Bustle, and The Verge, all
26 of which have reported on lawsuits I was involved in.

27 29. At any given time, Kneupper & Covey represents more than 350 clients in
28 active matters in consumer law cases. Our firm currently employs five full-time attorneys

1 (other than Mr. Covey and myself). We employ another part time attorney who primarily
2 handles intake matters.

3 30. I reviewed our firm’s internal data regarding our settlements. Our law firm
4 has either settled or recovered judgments in over 200 individual consumer law cases in
5 2023. We are regularly involved in numerous mediations or settlement discussions in those
6 cases (whose settlements are negotiated individually even if they are categorized as part of
7 a mass arbitration). In 2023, these individually settled or recovered cases by Kneupper &
8 Covey amounted to more than \$2.5 million. We have settled over 500 consumer cases in
9 total.

10 31. Defendant Total Health Supply TUA, Inc. listed its maximum exposure in this
11 matter as \$18,779,790 in bankruptcy. We were informed that this number came from
12 calculating the actual damages and trebling them, which would put actual damages at
13 \$6,259,930. This is slightly less than our own estimate, but very close. When this
14 bankruptcy was declared, I had to research and become familiar with bankruptcy law and
15 obtain admission to practice before bankruptcy court in the Central District of California.

16 32. Class Counsel began specifically evaluating the La Pura product around early
17 January 2020, and Ms. Tan retained Class Counsel shortly thereafter. At that time, we were
18 only aware of the Quick Box Parties as potential Defendants, and had not yet discovered
19 the identities of the La Pura Parties or the existence of / involvement of the Konnektive
20 Parties. We had no way to determine what the potential damages were or the volume of
21 products sold. The lawsuit was filed as part of a broader investigation of the “affiliate
22 marketing” industry—with significant time spent by us on several less-successful lawsuits
23 which identified smaller players. These cases included *Adam v. Barone, et al*, No. 3:20-cv-
24 10321 (D.N.J. 2020) and *Cummings v. Wyer, et al*, No. 2:19-cv-8766 (C.D. Cal. 2019).

25 33. Based on our prior monitoring of the websites at issue and our investigation
26 in this case, I believe the La Pura product at issue is no longer being sold. Its website has
27 been removed from the Internet.

28 34. The investigation which uncovered the conduct underlying the suit was

1 extraordinarily complex. It involved, among other things: (1) identifying online forums and
2 in-person conferences through which scammers communicated; (2) my own attendance of
3 a conference in person at which scammers were known to attend to collect evidence and
4 identify the companies involved; (3) sifting through the corporate records and websites of
5 nearly a hundred shell companies; (4) numerous interviews of former employees; (5)
6 developing software to preserve the numerous websites at issue; and (6) using this litigation
7 to identify defendants who were known to exist but were, at the time, unknown Doe(s).

8 35. Kneupper & Covey took this matter on a contingent basis and worked out of
9 pocket for more than four years to date without compensation. Our expenses to date, across
10 the entire case, are roughly \$377,036.82, without including updated notice costs. This
11 amount was advanced out of our personal funds or the proceeds of other litigation. While
12 Kneupper & Covey currently consists of seven attorneys, at the time of filing, it only
13 consisted of myself and Mr. Covey. We could have filed and prosecuted other cases during
14 this period instead of this one, as the firm generally receives requests for representation
15 from more than one hundred potential clients every week.

16 36. Kneupper & Covey was retained in 2024 to work on technology-related
17 litigation on an hourly basis at a rate of \$1,000 per hour for both myself and Mr. Covey. I
18 was also billed out at a rate of \$725 an hour to paying clients in the 2016 timeframe while
19 working at another law firm, McKool Smith, and while located in Austin, Texas.

20 37. Class Counsel have not told Ms. Tan that she would not be entitled to anything
21 if she objected to the settlement, have not told her that she would jeopardize the settlement
22 by not supporting it, and have not told her that she must support this settlement to receive
23 an incentive award.

24 38. Based on data produced in this case, each month—until they discovered the
25 undisclosed subscription—class members were billed for roughly \$200. Some class
26 members were billed for six months or more (meaning they would have been billed \$1,200
27 or more in unauthorized shipments).

28 39. Ms. Tan sat for a deposition and we expect she will testify at a bench trial if

1 the settlement with the Konnektive Parties is approved.

2 40. Attached as Exhibit 1 is a true and correct copy of the results of a search I
3 performed on the California Secretary of State website to determine the status of Rocket
4 Management Group.

5 41. Attached as Exhibit 2 is a true and correct copy of a lawsuit between Capitol
6 One, N.A. and Kiet Lieu.

7 42. Attached as Exhibit 3 is a true and correct copy of an export of our billing
8 records in this case from our firm's current billing software, Clockify.

9 43. Attached as Exhibit 4 is a true and correct copy of our billing records in this
10 case from early in the firm's existence, prior to using Clockify.

11 44. Attached as Exhibit 5 is a true and correct copy of a spreadsheet of the
12 expenses incurred in this matter organized by date. The spreadsheet includes a subtotal of
13 expenses incurred after the date of the Quick Box settlement. Those expenses total
14 \$259,307.45, and that amount is highlighted in yellow on page 4 of the spreadsheet.

15 45. Attached as Exhibit 6 is a true and correct copy of a spreadsheet of the
16 expenses incurred in this matter organized by category.

17 46. Attached as Exhibit 7 is an invoice for costs for class notice, which is not yet
18 complete, and which is not reflected in the other spreadsheets.

19 I declare and state under penalty of perjury pursuant to the laws of the State of
20 California that the foregoing is true and correct, and that this Declaration was executed this
21 23rd day of December, 2024 in Huntington Beach, California.

22
23 

24
25
26 _____
27 Kevin M. Kneupper, Esq.
28 Declarant

EXHIBIT 1


California
 Secretary of State

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Business Search

The California Business Search provides access to available information for **corporations, limited liability companies and limited partnerships** of record with the California Secretary of State, with **free PDF copies** of over 17 million imaged business entity documents, including the most recent imaged Statements of Information filed for Corporations and Limited Liability Companies.

Currently, information for Limited Liability Partnerships (e.g. law firms, architecture firms, engineering firms, public accountancy firms, and land survey firms), General Partnerships, and other entity types are **not contained** in the California Business Search. If you wish to obtain information about LLPs and GPs, submit a Business Entities Order paper form to request copies of filings for these entity types. Note: This search is not intended to serve as a name reservation search. To reserve an entity name, select Forms on the left panel and select Entity Name Reservation ? Corporation, LLC, LP.

Basic Search


- A Basic search can be performed using an entity name or entity number. When conducting a search by an entity number, where applicable, **remove "C"** from the entity number. Note, **a basic search** will search **only ACTIVE entities** (Corporations, Limited Liability Companies, Limited Partnerships, Cooperatives, Name Reservations, Foreign Name Reservations, Unincorporated Common Interest Developments, and Out of State Associations). The basic search performs a contains ?keyword? search. The Advanced search allows for a ?starts with? filter. To search entities that have a status other than active or to refine search criteria, use the **Advanced** search feature.

Advanced Search

- An Advanced search is required when searching for publicly traded disclosure information or a status other than active.
- An Advanced search allows for searching by specific entity types (e.g., Nonprofit Mutual Benefit Corporation) or by entity groups (e.g., All Corporations) as well as searching by ?begins with? specific search criteria.

Disclaimer: Search results are limited to the 500 entities closest matching the entered search criteria. If your desired search result is not found within the 500 entities provided, please refine the search criteria using the Advanced search function for additional results/entities. The California Business Search is updated as documents are approved. The data provided is not a complete or certified record.

Although every attempt has been made to ensure that the information contained in the database is accurate, the Secretary of State's office is not responsible for any loss, consequence, or damage resulting directly or indirectly from reliance on the accuracy, reliability, or timeliness of the information that is provided. All such information is provided "as is." To order certified copies or certificates of status, (1) locate an entity using the search; (2)select Request Certificate in the right-hand detail drawer; and (3) complete your request online.



Advanced ▾

Results: 1

Entity Information ▾	Initial Filing Date ▾	Status ▾	Entity Type ▾	Formed In ▾	Agent ▾
ROCKET MANAGEMENT GROUP, LLC (201836010157) >	12/18/2018	Forfeited - FTB	Limited Liability Company - Out of State	DELAWARE	ELINOR SPECTOR

EXHIBIT 2

PLD-C-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (<i>Name, State Bar number, and address</i>): GEORGE APOSHIAN, ESQ., Bar #303238 // LAURA M. D'ANNA, ESQ., Bar #266113 PATENAUDE & FELIX, A.P.C. 6800 Owensmouth Avenue, Suite 290 Canoga Park, CA 91303-4216 TELEPHONE NO.: 866-784-8084 FAX NO. (<i>Optional</i>): 818-906-7944 E-MAIL ADDRESS (<i>Optional</i>): ATTORNEY FOR (<i>Name</i>): PLAINTIFF	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE STREET ADDRESS: 700 CIVIC CENTER DR, WEST MAILING ADDRESS: 700 CIVIC CENTER DR, WEST CITY STATE AND ZIP CODE: SANTA ANA CA 92701 BRANCH NAME: CENTRAL JUSTICE CENTER-UNLIMITED CIVIL CASE	
PLAINTIFF: CAPITAL ONE, N.A. DEFENDANT(S): KIET T LIEU, <input checked="" type="checkbox"/> and DOES 1 through 5, inclusive	
CONTRACT <input checked="" type="checkbox"/> COMPLAINT <input type="checkbox"/> AMENDED COMPLAINT (<i>Number</i>): <input type="checkbox"/> CROSS-COMPLAINT <input type="checkbox"/> AMENDED CROSS-COMPLAINT (<i>Number</i>):	
Jurisdiction (<i>check all that apply</i>): <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000 but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint or cross-complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited	CASE NUMBER: 30-2023-01309368-CU-CL-CJC Assigned for All Purposes Judge Walter Schwarm

1. **Plaintiff*** (name or names): CAPITAL ONE, N.A.

alleges causes of action against **defendant(s)*** (*name or names*): KIET T LIEU, and DOES 1 through 5, inclusive

2. This pleading, including attachments and exhibits, consists of the following number of pages: 3

3. a. Each plaintiff named above is a competent adult

except plaintiff (*name*): CAPITAL ONE, N.A.

(1) a corporation qualified to do business in California

(2) an unincorporated entity (*describe*):

(3) other (*specify*): a National Banking Association organized and existing under and by virtue of the law of the United States of America.

b. Plaintiff (*name*):

a. has complied with the fictitious business name laws and is doing business under the fictitious name (*specify*):

b. has complied with all licensing requirements as a licensed (*specify*):

c. Information about additional plaintiffs who are not competent adults is shown in Attachment 3c.

4 a. Each defendant(s) named above is a natural person

except defendant (*name*):

(1) a business organization, form unknown

(2) a corporation

(3) an unincorporated entity (*describe*):

(4) a public entity (*describe*):

(5) other (*specify*):

except defendant (*name*):

(1) a business organization, form unknown

(2) a corporation

(3) an unincorporated entity (*describe*):

(4) a public entity (*describe*):

(5) other (*specify*):

*If this form is used as a cross-complaint, plaintiff means cross-complainant and defendant means cross-defendant.

Page 1 of 2

SHORT TITLE: CAPITAL ONE, N.A. vs. KIET T LIEU,	CASE NUMBER:
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4. (Continued)

- b. The true names of defendant(s) sued as Does are unknown to plaintiff.
 - (1) Doe defendant(s) (specify Doe numbers): _____ were the agents or employees of the named defendant(s) and acted within the scope of that agency or employment.
 - (2) Doe defendant(s) (specify Doe numbers): 1 through 5 are persons whose capacities are unknown to plaintiff.
- c. Information about additional defendants who are not natural persons is contained in Attachment 4c.
- d. Defendant(s) who are joined under Code of Civil Procedure section 382 are (names):

5. Plaintiff is required to comply with a claims statute, **and**

- a. has complied with applicable claims statutes, *or*
- b. is excused from complying because (specify):

6. This action is subject to Civil Code section 1812.10 Civil Code section 2984.4.

7. This court is the proper court because

- a. a defendant(s) entered into the contract here.
- b. a defendant(s) lived here when the contract was entered into.
- c. a defendant(s) lives here now.
- d. the contract was to be performed here.
- e. a defendant(s) is a corporation or unincorporated association and its principal place of business is here.
- f. real property that is the subject of this action is located here.
- g. other (specify):

8. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

- Breach of Contract
- Common Counts
- Other (specify): Refer to Other allegation in number 9

9. Other allegations: Before commencement of this action, in those cases where recovery of costs is dependent on such notices, Plaintiff informed the defendant(s) in writing it intended to file this action and that this action could result in a judgment against defendant(s) that would include court costs and necessary disbursements allowed by CCP Section 1033(b)(2).

10. **Plaintiff prays** for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. damages of: \$149,031.44
- b. interest on the damages
 - (1) according to proof
 - (2) at the rate of (specify): _____ percent per year from (date):
- c. attorney's fees
 - (1) of:
 - (2) according to proof.
- d. other (specify): For such other relief as the Court deems just and fair.

11. The paragraphs of this pleading alleged on information and belief are as follows (specify paragraph numbers):

Date: February 16, 2023

[] GEORGE APOSHIAN [X] LAURA M. D'ANNA

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

(If you wish to verify this pleading, affix a verification.)

PLD-C-001(2)

SHORT TITLE: CAPITAL ONE, N.A. vs. KIET T LIEU,	CASE NUMBER:
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FIRST _____ CAUSE OF ACTION—Common Counts
(number)

ATTACHMENT TO Complaint Cross-Complaint

(Use a separate cause of action form for each cause of action.)

CC-1. Plaintiff (name): CAPITAL ONE, N.A.

alleges that Defendant(s) (name): KIET T LIEU,

became indebted to plaintiff other (name):

- a. within the last four years
 - (1) on an open book account for money due.
 - (2) because an account was stated in writing by and between plaintiff and defendant in which it was agreed that defendant was indebted to plaintiff.
- b. within the last two years four years
 - (1) for money had and received by defendant for the use and benefit of plaintiff.
 - (2) for work, labor, services and materials rendered at the special instance and request of defendant and for which defendant promised to pay plaintiff
 - the sum of \$
 - the reasonable value.
 - (3) for goods, wares, and merchandise sold and delivered to defendant and for which defendant promised to pay plaintiff
 - the sum of \$
 - the reasonable value.
 - (4) for money lent by plaintiff to defendant at defendant's request.
 - (5) for money paid, laid out, and expended to or for defendant at defendant's special instance and request.
 - (6) other (specify): This cause of action is based upon account number XXXXXXXXXXXXXXX1990 for the sum by which Defendant has been unjustly enriched by virtue of Defendant receiving monetary or other benefit, by defendant knowingly requesting the funds at issue and/or accepting the benefits bestowed. It is inequitable for Defendant to retain said benefits without repaying Plaintiff the value thereof.

CC-2. \$149,031.44, which is the reasonable value, is due and unpaid despite plaintiff's demand, plus prejudgment interest according to proof at the rate of _____ percent per year from (date):

CC-3. Plaintiff is entitled to attorney fees by an agreement or a statute of \$ according to proof.

CC-4. Other: For such other and further relief as the Court deems just and fair.

Exhibit 3



Detailed report

01/01/2019 - 12/31/2024

Total: 3239:18 Billable: 3225:30 Amount: 2,157,109.50 USD

Date	Description	Duration	User
06/30/2020	Prepare Proofs of Service for filing and draft spreadsheet regarding status of all proofs La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 4:50PM - 6:26PM	Suzy Garcia 216.00 USD
07/01/2020	Prepare Notice of Service of Summons and Complaint; continue downloading proofs of service La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 1:40PM - 3:04PM	Suzy Garcia 189.00 USD
07/01/2020	Prepare Notice of Service of Summons and Complaint; continue downloading proofs of service La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 3:07PM - 3:49PM	Suzy Garcia 94.50 USD
07/03/2020	Prepare and file Notice of Service La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:03PM - 2:39PM	Suzy Garcia 81.00 USD
07/03/2020	Prepare and file Notice of Service La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 6:37PM - 7:19PM	Suzy Garcia 94.50 USD
07/07/2020	Draft waivers and notice of service for the Quick Box Defendants; prepare correspondence to counsel regarding same; prepare CLRA Letters for service on all defendants; calendar deadlines regarding Waiver of Summons La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 2:30PM - 4:00PM	Suzy Garcia 202.50 USD
07/07/2020	Draft waivers and notice of service for the Quick Box Defendants; prepare correspondence to counsel regarding same; prepare CLRA Letters for service on all defendants; calendar deadlines regarding Waiver of Summons La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 6:29PM - 7:17PM	Suzy Garcia 108.00 USD
07/07/2020	Draft waivers and notice of service for the Quick Box Defendants; prepare correspondence to counsel regarding same; prepare CLRA Letters for service on all defendants; calendar deadlines regarding Waiver of Summons La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 7:15PM - 9:33PM	Suzy Garcia 310.50 USD
07/08/2020	Prepare CLRA letters to all defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	4:00 3:30PM - 7:30PM	Suzy Garcia 540.00 USD
07/09/2020	conference with Konnektive RE: waiver of service and deadlines La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:03PM - 2:09PM	Cyclone Covey 81.50 USD
07/10/2020	Prepare Waiver of Service & Stipulation to Extend Time to Respond to Complaint La Pura - Tan v Quickbox [LTAN-CA-200128]	2:48 5:12PM - 8:00PM	Suzy Garcia 378.00 USD

07/14/2020	Prepare Waiver of Service and Stipulation; revise waver of the service of summons and notice of lawsuit La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 12:59PM - 1:41PM	Suzy Garcia 94.50 USD
07/14/2020	Review draft waiver of service forms; e-mail S. Garcia and C. Covey regarding waiver of service forms; e-mail K. Kronenberger regarding proposed extension. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:48PM - 6:06PM	Kevin Kneupper 244.50 USD
07/15/2020	Prepare Waiver of Service and Stipulation; revise waver of the service of summons and notice of lawsuit La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 1:41AM - 2:47AM	Suzy Garcia 148.50 USD
07/15/2020	Review draft stipulation and e-mail K. Kronenberger regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:18PM - 2:30PM	Kevin Kneupper 163.00 USD
07/15/2020	Revise Notices of Request to Waive Service and prepare correspondence to opposing counsel regarding same; calendar deadlines regarding Waiver of Service of Summons La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 5:21PM - 6:09PM	Suzy Garcia 108.00 USD
07/15/2020	Revise Notices of Request to Waive Service and prepare correspondence to opposing counsel regarding same; calendar deadlines regarding Waiver of Service of Summons La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 6:58PM - 7:40PM	Suzy Garcia 94.50 USD
07/17/2020	Prepare proofs of service for all Quick Box defendants for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:51PM - 6:21PM	Suzy Garcia 67.50 USD
07/20/2020	E-mail S. Garcia regarding waivers of service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:12PM - 3:24PM	Kevin Kneupper 163.00 USD
07/20/2020	Prepare proofs of service regarding defendants Kathryn Martorano and Konnektive Corporation; calendar defendants' response deadlines; review Order granting Joint Motion for Extension of Time to Answer La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 4:55PM - 5:43PM	Suzy Garcia 108.00 USD
07/22/2020	Review Order Granting Joint Motion For Extension of Time to Answer and calendar deadlines La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:35PM - 1:53PM	Suzy Garcia 40.50 USD
07/24/2020	Prepare Waivers of Service for Konnektive Defendants for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:00PM - 4:18PM	Suzy Garcia 40.50 USD
07/27/2020	Edit draft of motion to extend time; e-mail R. Waters regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:00PM - 1:18PM	Kevin Kneupper 244.50 USD
07/28/2020	Prepare Joint Stipulation to Extend Time to Respond and Proposed Order for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:32PM - 9:38PM	Suzy Garcia 13.50 USD
07/28/2020	Prepare Joint Stipulation to Extend Time to Respond and Proposed Order for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:00PM - 10:12PM	Suzy Garcia 27.00 USD

07/28/2020	Prepare Joint Stipulation to Extend Time to Respond and Proposed Order for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 10:15PM - 10:51PM	Suzy Garcia 81.00 USD
07/31/2020	Review status of service of Summons on Defendants and update spreadsheet re same; La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:10PM - 1:46PM	Suzy Garcia 81.00 USD
08/05/2020	File proof of service for Defendants; calendar response dates for Defendants; review Order Granting Extension of Time to Respond La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:18PM - 2:36PM	Suzy Garcia 40.50 USD
08/05/2020	File proof of service for Defendants; calendar response dates for Defendants; review Order Granting Extension of Time to Respond La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:17PM - 4:35PM	Suzy Garcia 40.50 USD
08/07/2020	Review status of service of process for all Defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 6:04PM - 6:58PM	Suzy Garcia 121.50 USD
08/14/2020	Review La Pura Defendants motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:00PM - 1:12PM	Kevin Kneupper 163.00 USD
08/17/2020	Review audio file; e-mail L. Vulic regarding audio file exhibit. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:42PM - 4:00PM	Kevin Kneupper 244.50 USD
08/18/2020	Review and analyze La Pura motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 12:48PM - 2:30PM	Kevin Kneupper 1,385.50 USD
09/01/2020	E-mail K. Howatt regarding page limits extension request; draft response to La Pura Defendants' motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:12 12:00PM - 5:12PM	Kevin Kneupper 4,238.00 USD
09/02/2020	Draft response to La Pura Defendants' motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:18 12:00PM - 4:18PM	Kevin Kneupper 3,504.50 USD
09/03/2020	Review draft of page limits extension request and e-mail K. Howett regarding same; e-mail R. Waters regarding page limits extension request; draft response to La Pura Defendants' motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:18 12:00PM - 8:18PM	Kevin Kneupper 6,764.50 USD
09/04/2020	Review updated draft of page limits extension request and e-mail K. Howett regarding same; e-mail R. Waters regarding page limits extension request; draft response to La Pura Defendants' motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:42 12:12PM - 5:54PM	Kevin Kneupper 4,645.50 USD
09/05/2020	Draft opposition to La Pura Defendants' motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:42 12:06PM - 6:48PM	Kevin Kneupper 5,460.50 USD
09/06/2020	Draft opposition to La Pura Defendants' motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:18 1:36PM - 8:54PM	Kevin Kneupper 5,949.50 USD
09/07/2020	Edit response to La Pura motion to dismiss and prepare for filing; message S. Garcia and C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:30 1:54PM - 5:24PM	Kevin Kneupper 2,852.50 USD

09/07/2020	Prepare response to defendants' motion to dismiss and declaration regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 2:12PM - 3:12PM	Suzy Garcia 135.00 USD
09/07/2020	Prepare response to defendants' motion to dismiss and declaration regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:07PM - 3:37PM	Suzy Garcia 67.50 USD
09/07/2020	Revise and assist in completing brief correct table of contents and table of authorities. Proofread and make changes La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 4:27PM - 6:09PM	Cyclone Covey 1,385.50 USD
09/07/2020	Prepare response to defendants' motion to dismiss and declaration regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:33PM - 6:51PM	Suzy Garcia 40.50 USD
09/08/2020	Prepare response to defendants' motion to dismiss and declaration regarding same; prepare opposition papers to be delivered to Judge's chambers La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:33PM - 2:03PM	Suzy Garcia 67.50 USD
09/09/2020	Review and analyze Konnektive motions to dismiss; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 12:00PM - 1:18PM	Kevin Kneupper 1,059.50 USD
09/10/2020	Review and analyze Konnektive motions to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 3:24PM - 5:48PM	Kevin Kneupper 1,956.00 USD
09/11/2020	Research information regarding Tyler Martorano; search for information regarding Nevada lawsuit and Response CRM; message C. Covey and S. Garcia regarding same; search for information regarding TrafficKonnekt affiliate network associated with Konnektive. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:54 12:12PM - 3:06PM	Kevin Kneupper 2,363.50 USD
09/11/2020	Communication Decency Act - Research and begin drafting response La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 2:18PM - 3:12PM	Cyclone Covey 733.50 USD
09/11/2020	Communication Decency Act - Research and begin drafting response La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 3:40PM - 5:22PM	Cyclone Covey 1,385.50 USD
09/11/2020	Review and calendar all deadlines regarding defendant Kathryn Martorano's Motion to Dismiss; prepare shells regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:48PM - 6:06PM	Suzy Garcia 40.50 USD
09/11/2020	Review and calendar all deadlines regarding defendants six Motions to Dismiss; prepare shells regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 7:05PM - 8:35PM	Suzy Garcia 202.50 USD
09/12/2020	Research information regarding Konnektive's operations. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 12:00PM - 1:24PM	Kevin Kneupper 1,141.00 USD
09/14/2020	Analyze issues relating to credit card factoring; message C. Covey regarding same; review and analyze briefs from Konnektive and QuickBox. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:48 12:00PM - 4:48PM	Kevin Kneupper 3,912.00 USD

09/14/2020	Communication Decency Act - Research and begin drafting response La Pura - Tan v Quickbox [LTAN-CA-200128]	2:12 1:42PM - 3:54PM	Cyclone Covey 1,793.00 USD
09/14/2020	Research Konnektive Nevada lawsuit complaint La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:00PM - 2:18PM	Suzy Garcia 40.50 USD
09/14/2020	Communication Decency Act - Research and begin drafting response La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:51PM - 4:15PM	Cyclone Covey 326.00 USD
09/14/2020	Review and calendar any deadlines for Defendant's responses to Motion to Dismiss and two additional Motions to Dismissed filed by Defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:09PM - 8:15PM	Suzy Garcia 13.50 USD
09/14/2020	Review and calendar all deadlines regarding defendants six Motions to Dismiss; prepare shells regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 8:12PM - 8:42PM	Suzy Garcia 67.50 USD
09/15/2020	Review and calendar all deadlines regarding defendants six Motions to Dismiss; prepare shells regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 2:21AM - 3:21AM	Suzy Garcia 135.00 USD
09/15/2020	Research Konnektive Nevada lawsuit complaint La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:28PM - 1:58PM	Suzy Garcia 67.50 USD
09/15/2020	Review and calendar all deadlines regarding defendants six Motions to Dismiss; prepare shells regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:03PM - 2:21PM	Suzy Garcia 40.50 USD
09/15/2020	Review and calendar all deadlines regarding defendants six Motions to Dismiss; prepare shells regarding same; review and calendar dates pursuant to court's Order dated 9/15/20 La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:16PM - 2:40PM	Suzy Garcia 54.00 USD
09/15/2020	Review and calendar all deadlines regarding defendants six Motions to Dismiss; prepare shells regarding same; review and calendar dates pursuant to court's Order dated 9/15/20 La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:21PM - 4:39PM	Suzy Garcia 40.50 USD
09/15/2020	Review and calendar all deadlines regarding defendants six Motions to Dismiss; prepare shells regarding same; review and calendar dates pursuant to court's Order dated 9/15/20 La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 5:23PM - 6:35PM	Suzy Garcia 162.00 USD
09/15/2020	Review and calendar all deadlines regarding defendants six Motions to Dismiss; prepare shells regarding same; review and calendar dates pursuant to court's Order dated 9/15/20 La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 6:58PM - 7:34PM	Suzy Garcia 81.00 USD
09/17/2020	Review and analyze Complaint against Konnektive defendants from Nevada state court and implications for personal jurisdiction. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:30PM - 2:24PM	Kevin Kneupper 733.50 USD
09/18/2020	Message C. Covey regarding GT Pay from Nevada complaint against Konnektive. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:12PM - 12:18PM	Kevin Kneupper 81.50 USD

09/18/2020	Prepare motions to dismiss for attorney review; review motions to dismiss and prepare notes regarding commonalities and differences La Pura - Tan v Quickbox [LTAN-CA-200128]	7:24 12:22PM - 7:46PM	Suzy Garcia 999.00 USD
09/19/2020	Message C. Covey regarding CodeClouds website and personal jurisdiction. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:00PM - 12:06PM	Kevin Kneupper 81.50 USD
09/21/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 1:15PM - 2:33PM	Suzy Garcia 175.50 USD
09/21/2020	Message C. Covey regarding personal jurisdiction motions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:42PM - 4:48PM	Kevin Kneupper 81.50 USD
09/21/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review La Pura - Tan v Quickbox [LTAN-CA-200128]	3:18 4:45PM - 8:03PM	Suzy Garcia 445.50 USD
09/21/2020	Review Konnektive MTD on the CLRA and UCL; analyze applicable cases in preparation for reply La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 7:06PM - 7:54PM	Cyclone Covey 652.00 USD
09/22/2020	MTD Response La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 9:36AM - 10:00AM	Cyclone Covey 326.00 USD
09/22/2020	MTD Response La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 10:22AM - 10:58AM	Cyclone Covey 489.00 USD
09/22/2020	MTD Response La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 11:16AM - 12:52PM	Cyclone Covey 1,304.00 USD
09/22/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review; review case summary and notice of party with financial interest La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 11:51AM - 1:21PM	Suzy Garcia 202.50 USD
09/22/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review; review case summary and notice of party with financial interest La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:46PM - 4:52PM	Suzy Garcia 13.50 USD
09/22/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review; review case summary and notice of party with financial interest La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 4:52PM - 6:34PM	Suzy Garcia 229.50 USD
09/23/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review; review case summary and notice of party with financial interest La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 12:09PM - 2:33PM	Suzy Garcia 324.00 USD
09/23/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review; review case summary and notice of party with financial interest La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 4:45PM - 6:09PM	Suzy Garcia 189.00 USD

09/23/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review; review case summary and notice of party with financial interest La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 7:25PM - 7:55PM	Suzy Garcia 67.50 USD
09/24/2020	MTD FAL/YCL La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 11:45AM - 12:57PM	Cyclone Covey 978.00 USD
09/24/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review; review case summary and notice of party with financial interest La Pura - Tan v Quickbox [LTAN-CA-200128]	2:48 12:31PM - 3:19PM	Suzy Garcia 378.00 USD
09/24/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review; review case summary and notice of party with financial interest La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 3:52PM - 4:58PM	Suzy Garcia 148.50 USD
09/24/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review; review case summary and notice of party with financial interest La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 5:30PM - 6:30PM	Suzy Garcia 135.00 USD
09/25/2020	Review complaint in Nevada lawsuit against Konnektive Defendants; investigate related issues alleged in complaint; conference with C. Covey regarding same; e-mail E. Rome regarding document preservation request. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:36 12:00PM - 4:36PM	Kevin Kneupper 3,749.00 USD
09/25/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review; review case summary and notice of party with financial interest La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 12:15PM - 2:33PM	Suzy Garcia 310.50 USD
09/28/2020	Collect evidence relating to Konnektive Defendants for oppositions to motion to dismiss; draft oppositions to motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:54 12:54PM - 7:48PM	Kevin Kneupper 5,623.50 USD
09/28/2020	Review and revise deadlines regarding motions to dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:19PM - 4:31PM	Suzy Garcia 27.00 USD
09/29/2020	MTD - Alter Ego La Pura - Tan v Quickbox [LTAN-CA-200128]	3:48 9:53AM - 1:41PM	Cyclone Covey 3,097.00 USD
09/29/2020	Collect evidence relating to Konnektive for oppositions to motion to dismiss; message and conference with C. Covey regarding evidence and source code; draft responses to Konnektive motions to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:42 12:12PM - 7:54PM	Kevin Kneupper 6,275.50 USD
09/29/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 1:23PM - 2:35PM	Suzy Garcia 162.00 USD
09/29/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:29PM - 3:59PM	Suzy Garcia 67.50 USD
09/29/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:03PM - 6:33PM	Suzy Garcia 67.50 USD

09/30/2020	Collect evidence relating to Konnektive; draft oppositions to motions to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	9:54 12:24PM - 10:18PM	Kevin Kneupper 8,068.50 USD
09/30/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:16PM - 2:34PM	Suzy Garcia 40.50 USD
09/30/2020	Review motions to dismiss and prepare notes regarding commonalities and differences for attorney review La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 4:49PM - 6:07PM	Suzy Garcia 175.50 USD
10/01/2020	E-mail opposing counsel regarding proposed extension; draft proposed extension; draft oppositions to Konnektive motions to dismiss; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:12 12:00PM - 7:12PM	Kevin Kneupper 5,868.00 USD
10/01/2020	Correspond with Judge Huff's clerk regarding deadlines for oppositions to motions to dismiss; review rules regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:18PM - 12:54PM	Suzy Garcia 81.00 USD
10/01/2020	Work on reply to Quickbox MTD - Rule 8, 9, Conspiracy, discuss extension of time with K Kneupper, discuss Konnektive MTD, review Konnektive websites for personal jurisdiction evidence La Pura - Tan v Quickbox [LTAN-CA-200128]	4:24 6:50PM - 11:14PM	Cyclone Covey 3,586.00 USD
10/02/2020	Draft oppositions to Konnektive motions to dismiss; message C. Covey regarding same; review changes to proposed stipulated extension; e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:42 12:00PM - 8:42PM	Kevin Kneupper 7,090.50 USD
10/02/2020	Work on reply to Quickbox MTD - aiding and abetting La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 4:14PM - 6:20PM	Cyclone Covey 1,711.50 USD
10/03/2020	E-mail opposing counsel regarding stipulation; file stipulation; draft oppositions to Konnektive motions to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	10:06 12:00PM - 10:06PM	Kevin Kneupper 8,231.50 USD
10/04/2020	Draft opposition to Konnektive motions to dismiss; conference with and message C. Covey regarding motions and document preservation; e-mail Konnektive attorneys regarding document preservation. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:42 12:00PM - 8:42PM	Kevin Kneupper 7,090.50 USD
10/05/2020	Draft oppositions to Quick Box motions to dismiss; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:12 12:00PM - 6:12PM	Kevin Kneupper 5,053.00 USD
10/05/2020	Review Order Granting Joint Motion for Extension of Briefing Deadlines and calendar all related deadlines La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:25PM - 6:49PM	Suzy Garcia 54.00 USD
10/06/2020	Draft oppositions to Quick Box motions to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:00 1:00PM - 7:00PM	Kevin Kneupper 4,890.00 USD
10/07/2020	Research issues relating to motions to dismiss; draft responses to Quick Box motions to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:12 1:06PM - 6:18PM	Kevin Kneupper 4,238.00 USD

10/08/2020	Draft responses to Quick Box motions to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:06 1:12PM - 8:18PM	Kevin Kneupper 5,786.50 USD
10/09/2020	Draft responses to Quick Box motions to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:36 1:00PM - 4:36PM	Kevin Kneupper 2,934.00 USD
10/09/2020	Prepare declarations and exhibits in support of plaintiff's opposition to Konnektive Corporation's Motion to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	2:54 3:23PM - 6:17PM	Suzy Garcia 391.50 USD
10/12/2020	Draft responses to Quick Box motions to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:18 2:00PM - 8:18PM	Kevin Kneupper 5,134.50 USD
10/13/2020	Draft responses to Quick Box motions to dismiss; draft responses to Konnektive motions to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:24 1:42PM - 10:06PM	Kevin Kneupper 6,846.00 USD
10/14/2020	Draft response to Konnektive motions to dismiss; research information regarding Konnektive prior lawsuits; message C. Covey regarding Konnektive Nevada lawsuit dismissal. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:18 1:18PM - 8:36PM	Kevin Kneupper 5,949.50 USD
10/14/2020	Prepare declarations and exhibits in support of plaintiff's opposition to Konnektive Corporation's Motion to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 1:47PM - 2:29PM	Suzy Garcia 94.50 USD
10/14/2020	Prepare declarations and exhibits in support of plaintiff's opposition to Konnektive Corporation's Motion to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 2:57PM - 5:33PM	Suzy Garcia 351.00 USD
10/14/2020	Prepare opposition to Konnektive Corporation's Motion to Dismiss, declarations and exhibits regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 5:31PM - 6:37PM	Suzy Garcia 148.50 USD
10/14/2020	Prepare opposition to Konnektive Corporation's Motion to Dismiss, declarations and exhibits regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 7:14PM - 8:02PM	Suzy Garcia 108.00 USD
10/14/2020	Prepare opposition to Konnektive Corporation's Motion to Dismiss, declarations and exhibits regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:39PM - 8:51PM	Suzy Garcia 27.00 USD
10/14/2020	Prepare opposition to Konnektive Corporation's Motion to Dismiss, declarations and exhibits regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:32PM - 9:50PM	Suzy Garcia 40.50 USD
10/15/2020	Draft responses to Konnektive motions to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	9:06 1:18PM - 10:24PM	Kevin Kneupper 7,416.50 USD
10/16/2020	Draft responses to Konnektive motions to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:30 1:18PM - 6:48PM	Kevin Kneupper 4,482.50 USD
10/16/2020	Discuss briefing schedule and upcoming deadlines with K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:50PM - 6:02PM	Cyclone Covey 163.00 USD

10/17/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 2:07AM - 3:55AM	Suzy Garcia 243.00 USD
10/19/2020	Edit draft of response to Konnektive LLC motion to dismiss; e-mail S. Garcia regarding same; edit draft of response to K. Martorano motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:12 12:24PM - 8:36PM	Kevin Kneupper 6,683.00 USD
10/20/2020	Draft response to K. Martorano motion to dismiss; search for documents relating to K. Martorano; watch video of M. Martorano; message S. Garcia regarding preparation of motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:18 12:00PM - 7:18PM	Kevin Kneupper 5,949.50 USD
10/21/2020	Draft response to Quick Box LLC motion; search for materials relating to Quick Box LLC; draft response to Konnektive Rewards motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:00 1:30PM - 9:30PM	Kevin Kneupper 6,520.00 USD
10/22/2020	Draft motions to dismiss; review potential exhibits; message S. Garcia regarding exhibit preparation. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:12 1:36PM - 8:48PM	Kevin Kneupper 5,868.00 USD
10/22/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 3:55PM - 6:19PM	Suzy Garcia 324.00 USD
10/23/2020	Draft oppositions to motion to dismiss; review 2chads website archives; review materials and exhibits for oppositions; message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	9:12 2:00PM - 11:12PM	Kevin Kneupper 7,498.00 USD
10/23/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 2:03PM - 2:45PM	Suzy Garcia 94.50 USD
10/23/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 3:04PM - 5:40PM	Suzy Garcia 351.00 USD
10/23/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 7:33PM - 9:33PM	Suzy Garcia 270.00 USD
10/23/2020	Work on Stephen Adele fact part of brief and assemble exhibits La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:27PM - 9:45PM	Cyclone Covey 244.50 USD
10/23/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:54PM - 10:00PM	Suzy Garcia 13.50 USD
10/24/2020	Draft oppositions to motions to dismiss; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:42 1:00PM - 4:42PM	Kevin Kneupper 3,015.50 USD
10/24/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	2:12 6:24PM - 8:36PM	Suzy Garcia 297.00 USD

10/24/2020	Work on Stephen Adele fact part of brief and assemble exhibits La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 9:27PM - 11:33PM	Cyclone Covey 1,711.50 USD
10/24/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 9:37PM - 11:19PM	Suzy Garcia 229.50 USD
10/25/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	3:30 12:41PM - 4:11PM	Suzy Garcia 472.50 USD
10/25/2020	Draft oppositions to motions to dismiss; message C. Covey regarding same; message S. Garcia regarding motion preparation. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:00 1:06PM - 9:06PM	Kevin Kneupper 6,520.00 USD
10/25/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 5:33PM - 7:09PM	Suzy Garcia 216.00 USD
10/25/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	3:42 7:22PM - 11:04PM	Suzy Garcia 499.50 USD
10/25/2020	Work on Stephen Adele fact part of brief and assemble exhibits La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 9:27PM - 10:21PM	Cyclone Covey 733.50 USD
10/25/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 11:22PM - 12:16AM ⁺¹	Suzy Garcia 121.50 USD
10/26/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:50AM - 2:14AM	Suzy Garcia 54.00 USD
10/26/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 10:49AM - 11:19AM	Suzy Garcia 67.50 USD
10/26/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:27PM - 12:33PM	Suzy Garcia 13.50 USD
10/26/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	3:36 1:17PM - 4:53PM	Suzy Garcia 486.00 USD
10/26/2020	Prepare Declarations and exhibits ISO Opposition to defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 5:20PM - 8:02PM	Suzy Garcia 364.50 USD
10/26/2020	Finalize Adele brief and exhibits La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 6:54PM - 8:18PM	Cyclone Covey 1,141.00 USD
10/26/2020	Draft Martell response and compile exhibits La Pura - Tan v Quickbox [LTAN-CA-200128]	4:18 6:55PM - 11:13PM	Cyclone Covey 3,504.50 USD

10/26/2020	Draft Biggins response and compile exhibits La Pura - Tan v Quickbox [LTAN-CA-200128]	3:30 6:56PM - 10:26PM	Cyclone Covey 2,852.50 USD
10/26/2020	Review Quick Holdings brief draft, make revisions La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 7:00PM - 7:36PM	Cyclone Covey 489.00 USD
10/26/2020	finalize all Quickbox briefs, assist with compiling exhibits, fix TOA for all briefs La Pura - Tan v Quickbox [LTAN-CA-200128]	2:30 7:47PM - 10:17PM	Cyclone Covey 2,037.50 USD
10/26/2020	Finalize drafts of oppositions; review filing versions and exhibits; message C. Covey and S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	10:18 11:36PM - 9:54AM ⁺¹	Kevin Kneupper 8,394.50 USD
10/27/2020	Correspond with Court clerk regarding plaintiff's oppositions to Quick Box defendants' Motions to Dismiss and Order (Dkt. No. 28) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:33PM - 12:57PM	Suzy Garcia 54.00 USD
10/27/2020	Correspond with Court clerk regarding plaintiff's oppositions to Quick Box defendants' Motions to Dismiss and Order (Dkt. No. 28); prepare courtesy copies of plaintiff's eleven oppositions to defendants' motions to dismiss to be delivered to Hon. Huff La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 1:36PM - 2:18PM	Suzy Garcia 94.50 USD
10/27/2020	Correspond with Court clerk regarding plaintiff's oppositions to Quick Box defendants' Motions to Dismiss and Order (Dkt. No. 28); prepare courtesy copies of plaintiff's eleven oppositions to defendants' motions to dismiss to be delivered to Hon. Huff; prepare exhibit to oppositions to Konnektive defendants' motions to dismiss to be lodge with court La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:27PM - 3:03PM	Suzy Garcia 81.00 USD
10/27/2020	Correspond with Court clerk regarding plaintiff's oppositions to Quick Box defendants' Motions to Dismiss and Order (Dkt. No. 28); prepare courtesy copies of plaintiff's eleven oppositions to defendants' motions to dismiss to be delivered to Hon. Huff; prepare exhibit to oppositions to Konnektive defendants' motions to dismiss to be lodge with court La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:34PM - 5:04PM	Suzy Garcia 67.50 USD
10/27/2020	Correspond with Court clerk regarding plaintiff's oppositions to Quick Box defendants' Motions to Dismiss and Order (Dkt. No. 28); prepare courtesy copies of plaintiff's eleven oppositions to defendants' motions to dismiss to be delivered to Hon. Huff; prepare exhibit to oppositions to Konnektive defendants' motions to dismiss to be lodge with court La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 5:51PM - 6:33PM	Suzy Garcia 94.50 USD
10/28/2020	Prepare courtesy copies of plaintiff's eleven oppositions to defendants' motions to dismiss to be delivered to Hon. Huff La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 12:28PM - 1:34PM	Suzy Garcia 148.50 USD
11/05/2020	Draft motion for entry of default; message C. Covey regarding same; e-mail D. Scher regarding whistleblower; conference with D. Scher regarding whistleblower; research information regarding whistleblower allegations involving Quick Box Defendants; research information regarding defaulting defendants and executives and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 12:00PM - 1:54PM	Kevin Kneupper 1,548.50 USD
11/06/2020	Conference call with D. Wright and C. Covey; draft timeline of calls; conference with C. Covey regarding D. Wright Rule 11 threats; investigate Quick Box whistleblower facts; message C. Covey regarding Quick Box whistleblower theories. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 12:00PM - 1:54PM	Kevin Kneupper 1,548.50 USD

11/06/2020	Prepare shells for motion for entry of default and declaration regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 5:50PM - 6:26PM	Suzy Garcia 81.00 USD
11/09/2020	Conference with C. Covey regarding response to D. Wright threats; draft e-mail response and send to D. Wright. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:06PM - 12:30PM	Kevin Kneupper 326.00 USD
11/09/2020	Prepare and file proof of service of Summons and Complaint on Mr. Seruya La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:06PM - 12:30PM	Suzy Garcia 54.00 USD
11/09/2020	Prepare shells for motion for entry of default and declaration regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:07PM - 3:37PM	Suzy Garcia 67.50 USD
11/10/2020	E-mail whistleblower attorney regarding Quick Box; message C. Covey regarding whistleblower attorney; message C. Covey regarding D. Wright e-mail. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:00PM - 12:18PM	Kevin Kneupper 244.50 USD
11/12/2020	Review and calendar all deadlines regarding entry of default regarding Defendants Beauty and Balance LV, Inc., Diet Focus MG, Inc., Select Skin Products MV, Inc., and Skin Beauty Enterprise MG, Inc. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:53PM - 6:05PM	Suzy Garcia 27.00 USD
11/16/2020	Prepare defendants' replies to oppositions to dismiss for attorney review. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:19PM - 9:49PM	Suzy Garcia 67.50 USD
11/17/2020	Conference with C. Covey regarding call from Quick Box whistleblower named "Christina"; conference with whistleblower; message with C. Covey regarding whistleblower; search for information confirming details from whistleblower call; message C. Covey regarding theories relating to scope of Quick Box predicate acts. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:48 12:00PM - 4:48PM	Kevin Kneupper 3,912.00 USD
11/17/2020	Prepare shells for Plaintiff's responses to Quick Box Defendants' objections to evidence in support of oppositions to motions to dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 4:53PM - 6:17PM	Suzy Garcia 189.00 USD
11/17/2020	Prepare shells for Plaintiff's responses to Quick Box Defendants' objections to evidence in support of oppositions to motions to dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 8:14PM - 10:08PM	Suzy Garcia 256.50 USD
11/17/2020	Discussion with K Kneupper RE: whistleblower call La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 9:38PM - 10:14PM	Cyclone Covey 489.00 USD
11/18/2020	Prepare shells for Plaintiff's responses to Quick Box Defendants' objections to evidence in support of oppositions to motions to dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:06AM - 2:00AM	Suzy Garcia 121.50 USD
11/18/2020	Review objections to exhibits from Quick Box defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 12:00PM - 12:54PM	Kevin Kneupper 733.50 USD

11/19/2020	Prepare shells for Plaintiff's responses to Quick Box Defendants' objections to evidence in support of oppositions to motions to dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 6:41PM - 7:17PM	Suzy Garcia 81.00 USD
11/20/2020	Prepare shells for Plaintiff's responses to Quick Box Defendants' objections to evidence in support of oppositions to motions to dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	3:12 11:59AM - 3:11PM	Suzy Garcia 432.00 USD
11/20/2020	Draft responses to objections to C. Biggins exhibits; message S. Garcia regarding shells for exhibit objection responses. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 12:18PM - 3:00PM	Kevin Kneupper 2,200.50 USD
11/21/2020	Draft responses to objections to C. Biggins, J. Martell, and S. Adele exhibits. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:42 12:00PM - 3:42PM	Kevin Kneupper 3,015.50 USD
11/22/2020	Prepare shells for Plaintiff's responses to Quick Box Defendants' objections to evidence in support of oppositions to motions to dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 11:54AM - 12:48PM	Suzy Garcia 121.50 USD
11/22/2020	Draft responses to objections to S. Adele, Quick Box LLC, and Quick Holdings exhibits; message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:06 12:00PM - 4:06PM	Kevin Kneupper 3,341.50 USD
11/23/2020	Plaintiff's responses to Quick Box Defendants' evidentiary objections for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 1:16PM - 2:34PM	Suzy Garcia 175.50 USD
11/23/2020	Prepare shells for Plaintiff's responses to Quick Box Defendants' objections to evidence in support of oppositions to motions to dismiss; prepare conformed copies of responses to be delivered to Judge's chambers La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 2:50PM - 3:50PM	Suzy Garcia 135.00 USD
12/02/2020	Review Order continuing hearings on motions to dismiss; calendar all dates regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:33PM - 1:51PM	Suzy Garcia 40.50 USD
12/07/2020	Review Order re Motions to Dismiss and Vacating Hearing and revise calendar regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:53PM - 6:59PM	Suzy Garcia 13.50 USD
12/08/2020	Review court order on motions to dismiss; analyze issues relating to amendment of complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 1:06PM - 2:12PM	Kevin Kneupper 896.50 USD
12/08/2020	Prepare shells for motion for leave to file a response to the Konnektive Defendants' Exhibit Objections and response regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:05PM - 5:11PM	Suzy Garcia 13.50 USD
12/08/2020	Prepare shells for motion for leave to file a response to the Konnektive Defendants' Exhibit Objections and response regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:38PM - 6:02PM	Suzy Garcia 54.00 USD

12/08/2020	Prepare shells for motion for leave to file a response to the Konnektive Defendants' Exhibit Objections and response regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:47PM - 6:59PM	Suzy Garcia 27.00 USD
12/08/2020	Review Order regarding Defendants' Motions to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:42PM - 7:54PM	Suzy Garcia 27.00 USD
12/09/2020	E-mail L. Tan regarding case update. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:00PM - 12:12PM	Kevin Kneupper 163.00 USD
12/10/2020	Conference with K. Kronenberger and C. Covey regarding settlement; conference with C. Covey regarding call. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:00PM - 12:24PM	Kevin Kneupper 326.00 USD
12/10/2020	Call w opposing counsel re settlement and call w K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:37PM - 8:01PM	Cyclone Covey 326.00 USD
12/15/2020	E-mail D. Wright regarding amended complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:00AM - 11:06AM	Kevin Kneupper 81.50 USD
12/16/2020	Conference with C. Covey regarding settlement offer request from Quick Box; e-mail D. Wright regarding settlement offer request. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:00PM - 12:24PM	Kevin Kneupper 326.00 USD
12/17/2020	E-mail K. Kronenberger regarding amended complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:00AM - 11:06AM	Kevin Kneupper 81.50 USD
12/18/2020	Conference with C. Covey and K. Kronenberger regarding settlement issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:06AM - 11:12AM	Kevin Kneupper 81.50 USD
12/18/2020	call w La Pura counsel about possible settlement options La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:54PM - 4:12PM	Cyclone Covey 244.50 USD
12/29/2020	Draft amended complaint; research issues relating to James Martell and Private Label Campaigns; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	10:18 11:00AM - 9:18PM	Kevin Kneupper 8,394.50 USD
12/30/2020	Message and conference with C. Covey regarding Private Label Campaigns; research PLC; draft amended complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	11:12 11:00AM - 10:12PM	Kevin Kneupper 9,128.00 USD
12/31/2020	Draft amended complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:18 11:18AM - 6:36PM	Kevin Kneupper 5,949.50 USD
01/01/2021	Draft amended complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 11:00AM - 12:54PM	Kevin Kneupper 1,548.50 USD
01/02/2021	Draft amended complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	11:18 11:00AM - 10:18PM	Kevin Kneupper 9,209.50 USD
01/03/2021	Draft amended complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	10:42 11:00AM - 9:42PM	Kevin Kneupper 8,720.50 USD

01/04/2021	Edit draft of complaint; research issues relating to RICO. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:48 12:00PM - 8:48PM	Kevin Kneupper 7,172.00 USD
01/05/2021	Edit draft of complaint; research issues relating to RICO; review LinkedIn profile of Private Label Campaigns software developer and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	10:30 12:00PM - 10:30PM	Kevin Kneupper 8,557.50 USD
01/06/2021	Edit draft of complaint; research issues relating to RICO; message C. Covey regarding false front websites for La Pura; review same. La Pura - Tan v Quickbox [LTAN-CA-200128]	9:18 12:00PM - 9:18PM	Kevin Kneupper 7,579.50 USD
01/07/2021	Edit draft of complaint; proofread final draft; message S. Garcia regarding filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:18 12:00PM - 7:18PM	Kevin Kneupper 5,949.50 USD
01/07/2021	Prepare exhibits to First Amended Complaint La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:16PM - 6:46PM	Suzy Garcia 67.50 USD
01/08/2021	Prepare First Amended complaint and exhibits for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 12:26AM - 1:26AM	Suzy Garcia 135.00 USD
01/12/2021	Review QuickBox stipulation for extension; e-mail K. Howatt regarding same; review Konnektive extension; e-mail R. Waters regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:12PM - 3:24PM	Kevin Kneupper 163.00 USD
01/14/2021	Review draft stipulation for extension of time; e-mail R. Waters regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:54PM - 2:00PM	Kevin Kneupper 81.50 USD
01/15/2021	Message C. Covey regarding potential witness. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:06PM - 12:12PM	Kevin Kneupper 81.50 USD
01/15/2021	Review Joint Motion to Continue Extended Time to Respond to First Amended Complaint and calendar all related deadlines La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:55PM - 1:01PM	Suzy Garcia 13.50 USD
01/15/2021	Review Joint Motion to Continue Extended Time to Respond to First Amended Complaint and order; calendar all deadlines regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:55PM - 2:19PM	Suzy Garcia 54.00 USD
01/17/2021	E-mail L. Tan regarding amended complaint and respond to questions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:06PM - 12:18PM	Kevin Kneupper 163.00 USD
01/18/2021	Message and conference with C. Covey regarding potential witness / backup client. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:18PM - 12:36PM	Kevin Kneupper 244.50 USD
01/18/2021	messages and phone call w potential witness who was scammed by La Pura La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:34PM - 12:46PM	Cyclone Covey 163.00 USD
01/19/2021	Review Joint Stipulation for Extension of Time for Konnektive Defendants to Answer and Order, and calendar related deadlines regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:38PM - 6:02PM	Suzy Garcia 54.00 USD

01/22/2021	Review motion to dismiss; research issues relating to RICO and alter ego; draft response to motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:12 12:06PM - 3:18PM	Kevin Kneupper 2,608.00 USD
01/22/2021	Review Motion to Dismiss for Failure to State a Claim and calendar all related deadlines La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:31PM - 1:49PM	Suzy Garcia 40.50 USD
01/22/2021	Review Motion to Dismiss for Failure to State a Claim and calendar all related deadlines; prepare shells for Plaintiff's Opposition to Motion to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:00PM - 3:24PM	Suzy Garcia 54.00 USD
01/22/2021	Review Motion to Dismiss for Failure to State a Claim and calendar all related deadlines; prepare shells for Plaintiff's Opposition to Motion to Dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:56PM - 4:20PM	Suzy Garcia 54.00 USD
01/24/2021	Research issues relating to plausibility standard; draft response to La Pura Defendants' motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 12:00PM - 1:36PM	Kevin Kneupper 1,304.00 USD
01/25/2021	Research 12(g)(2) issue; draft response to La Pura Defendants' Motion to Dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 6:36PM - 8:12PM	Kevin Kneupper 1,304.00 USD
01/26/2021	Draft response to La Pura Defendants motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:00 11:00AM - 6:00PM	Kevin Kneupper 5,705.00 USD
01/27/2021	Draft response to La Pura motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	9:54 11:00AM - 8:54PM	Kevin Kneupper 8,068.50 USD
01/28/2021	Draft response to La Pura motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:18 1:06PM - 7:24PM	Kevin Kneupper 5,134.50 USD
01/29/2021	Draft response to La Pura motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:30 1:30PM - 7:00PM	Kevin Kneupper 4,482.50 USD
02/02/2021	E-mail R. Waters regarding request for extension of time to file MTD. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:00PM - 12:06PM	Kevin Kneupper 81.50 USD
02/02/2021	email and discuss deadline extension w K Kneupper, discuss settlement possibilities and scenarios w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:03PM - 5:33PM	Cyclone Covey 407.50 USD
02/03/2021	Review draft joint motion for extension of time and e-mail R. Waters regarding same; review draft joint motion for extension of time and e-mail K. Howatt regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:54PM - 1:18PM	Kevin Kneupper 326.00 USD
02/04/2021	Review Joint Motion for Extension for Time to File Answer and Case Summary La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:51PM - 2:09PM	Suzy Garcia 40.50 USD
02/05/2021	Review Order granting second extension for Defendants to answer and calendar all related deadlines La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:54PM - 5:12PM	Suzy Garcia 40.50 USD

02/11/2021	Review Quick Box and Konnektive motions; conference with C. Covey regarding same; investigate Rocket Management Group and Kiet Liu; e-mail K. Kronenberger regarding scheduling call to discuss case; research issue relating to filing redline for FAC; message C. Covey regarding preparation of redline to file. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:54 12:00PM - 3:54PM	Kevin Kneupper 3,178.50 USD
02/11/2021	discuss call possibilities w K Kneupper and initial thoughts on the defendants replies, calendar calls La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:24PM - 11:36PM	Cyclone Covey 163.00 USD
02/12/2021	Review Quick Box and Konnektive motions; prepare for call with opposing counsel from Quickbox and Konnektive; conference with opposing counsel; conference with C. Covey regarding same; conference with K. Kronenberger and C. Covey regarding filings; draft response to La Pura Defendants motion to dismiss and prepare for filing; message C. Covey regarding preparation of redline; draft cover pleading for redline of FAC; message S. Garcia regarding filings. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:24 12:00PM - 8:24PM	Kevin Kneupper 6,846.00 USD
02/12/2021	Review Defendants' Motions to Dismiss Plaintiffs First Amended Complaint and calendar all deadlines; prepare shells for Oppositions regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 12:56PM - 2:56PM	Suzy Garcia 270.00 USD
02/12/2021	call RE: threatened Rule 11 motion, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 6:04PM - 6:46PM	Cyclone Covey 570.50 USD
02/12/2021	Prepare Opposition to Defendant Total Health Supply TUA, Inc.'s Motion to Dismiss, Exhibits and Notice of Compliance with Local Rule 15.1(c) for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	3:30 10:42PM - 2:12AM ⁺¹	Suzy Garcia 472.50 USD
02/13/2021	Prepare Opposition to Defendant Total Health Supply TUA, Inc.'s Motion to Dismiss, Exhibits and Notice of Compliance with Local Rule 15.1(c) for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:33AM - 3:03AM	Suzy Garcia 67.50 USD
02/13/2021	Research information regarding C. Biggins bank account claims; message C. Covey regarding money laundering theory. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:00PM - 12:18PM	Kevin Kneupper 244.50 USD
02/14/2021	Draft response to Quick Box MTD. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 12:00PM - 2:36PM	Kevin Kneupper 2,119.00 USD
02/14/2021	Draft response to rule 11 threats; message C. Covey regarding same; edit response after C. Covey edits. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	1:00 1:54PM - 2:54PM	Kevin Kneupper 815.00 USD
02/14/2021	edit K Kneupper draft letter in response to Rule 11 threat La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 7:03PM - 8:39PM	Cyclone Covey 1,304.00 USD
02/15/2021	Draft response to Quick Box MTD; research issues relating to RICO; investigate merchant processors from entries in Konnektive MTD exhibit; message C. Covey regarding merchant processors. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:42 12:30PM - 4:12PM	Kevin Kneupper 3,015.50 USD

02/15/2021	E-mail opposing counsel regarding Rule 11 issue; read Quick Box draft Rule 11 motion; research and review prior Judge Huff opinions on Rule 11; message C. Covey regarding Rule 11 issues. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	2:18 3:12PM - 5:30PM	Kevin Kneupper 1,874.50 USD
02/15/2021	review opposing partys Rule 11 motions, discuss w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:29PM - 9:59PM	Cyclone Covey 407.50 USD
02/16/2021	Research issues relating to use of declarations in 12(b)(6) motions; draft response to Quick Box MTD. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 12:00PM - 1:42PM	Kevin Kneupper 1,385.50 USD
02/16/2021	Review Konnektive motion; research issues relating to Rule 11; research use of declarations in Rule 11 motions. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	1:54 1:42PM - 3:36PM	Kevin Kneupper 1,548.50 USD
02/17/2021	Prepare for call with L. Tan; conference with L. Tan and C. Covey regarding Rule 11 threats. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:30 12:00PM - 12:30PM	Kevin Kneupper 407.50 USD
02/17/2021	Research issues relating to Quick Box MTD; draft response to Quick Box MTD. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:06 12:42PM - 6:48PM	Kevin Kneupper 4,971.50 USD
02/17/2021	Prepare shells for Plaintiff's Oppositions to Konnektive and Quick Box Defendants' Motions to Dismiss FAC La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 1:31PM - 2:31PM	Suzy Garcia 135.00 USD
02/17/2021	Prepare shells for Plaintiff's Oppositions to Konnektive and Quick Box Defendants' Motions to Dismiss FAC; review Order regarding Motions to Dismiss and calendar all related deadlines La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:00PM - 6:12PM	Suzy Garcia 27.00 USD
02/18/2021	E-mail R. Waters regarding inaccurate summary of Rule 11 conversation. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:06 2:36PM - 2:42PM	Kevin Kneupper 81.50 USD
02/18/2021	Draft response to Quick Box MTD; review BBB pages on Quick Box free trial scams; message C. Covey regarding using archiving utility on BBB pages. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:18 6:18PM - 10:36PM	Kevin Kneupper 3,504.50 USD
02/22/2021	Research Rule 11 issues; message C. Covey regarding procedural defects in motions. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	1:48 12:00PM - 1:48PM	Kevin Kneupper 1,467.00 USD
02/22/2021	Draft response to Quick Box motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:54 1:48PM - 4:42PM	Kevin Kneupper 2,363.50 USD
02/23/2021	Research issues relating to Rule 11; draft e-mail to opposing counsel and message C. Covey regarding same; e-mail opposing counsel regarding Rule 11 threat. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	1:54 1:00PM - 2:54PM	Kevin Kneupper 1,548.50 USD
02/23/2021	Draft response to Quick Box MTD. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:06 2:54PM - 7:00PM	Kevin Kneupper 3,341.50 USD

02/23/2021	discussion about opposing counsel's desire to conduct another Rule 11 call w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:53PM - 7:59PM	Cyclone Covey 81.50 USD
02/24/2021	Draft response to Quick Box MTD. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:18 12:42PM - 8:00PM	Kevin Kneupper 5,949.50 USD
02/25/2021	Draft response to Quick Box MTD. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:12 12:06PM - 8:18PM	Kevin Kneupper 6,683.00 USD
02/26/2021	Draft response to Quick Box MTD; draft response to Konnektive MTD. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:54 1:24PM - 8:18PM	Kevin Kneupper 5,623.50 USD
02/27/2021	Draft response to Konnektive MTD. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 12:00PM - 2:00PM	Kevin Kneupper 1,630.00 USD
02/28/2021	Draft response to Konnektive MTD. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 1:42PM - 4:18PM	Kevin Kneupper 2,119.00 USD
03/01/2021	Draft response to Quick Box motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 4:48PM - 6:42PM	Kevin Kneupper 1,548.50 USD
03/02/2021	Draft response to Quick Box motion to dismiss; draft response to Konnektive motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:12 12:24PM - 8:36PM	Kevin Kneupper 6,683.00 USD
03/03/2021	Draft response to Quick Box motion to dismiss; draft response to Konnektive motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:48 12:12PM - 6:00PM	Kevin Kneupper 4,727.00 USD
03/04/2021	Draft response to Konnektive motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:18 12:00PM - 4:18PM	Kevin Kneupper 3,504.50 USD
03/07/2021	Prepare opposition to Quick Box Defendants' motion to dismiss the first amended complaint, declaration and exhibits for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 3:30PM - 5:24PM	Suzy Garcia 256.50 USD
03/08/2021	Prepare opposition to Quick Box Defendants' motion to dismiss the first amended complaint, declaration and exhibits for filing; review case summary and review Pro Hac Vice Application regarding D. Wright and La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 11:52AM - 12:22PM	Suzy Garcia 67.50 USD
03/08/2021	Draft response to Konnektive motion to dismiss; prepare Quick Box motion for filing; message S. Garcia regarding filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	9:48 12:00PM - 9:48PM	Kevin Kneupper 7,987.00 USD
03/08/2021	Prepare opposition to Quick Box Defendants' motion to dismiss the first amended complaint, declaration and exhibits for filing; review case summary and review pleadings regarding Pro Hac Vice Application for D. Wright and La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:20PM - 12:26PM	Suzy Garcia 13.50 USD
03/08/2021	Prepare opposition to Konnektive Defendants' motion to dismiss the first amended complaint, declaration and exhibits for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 10:40PM - 12:10AM ⁺¹	Suzy Garcia 202.50 USD

03/09/2021	Prepare opposition to Konektive Defendants' motion to dismiss the first amended complaint, declaration and exhibits for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:53AM - 1:11AM	Suzy Garcia 40.50 USD
03/09/2021	Prepare courtesy copies of Oppositions to Motions to Quash First Amended Complaint to be delivered to Judge's Chambers La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:20PM - 5:38PM	Suzy Garcia 40.50 USD
03/09/2021	Prepare courtesy copies of Oppositions to Motions to Quash First Amended Complaint to be delivered to Judge's Chambers La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:51PM - 8:09PM	Suzy Garcia 40.50 USD
03/10/2021	planning call with Kevin and Cyclone Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:06 8:33PM - 8:39PM	Andrea Reed 44.50 USD
03/11/2021	Research filing in camera motions in S.D. Cal. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	1:48 12:23PM - 2:11PM	Andrea Reed 801.00 USD
03/11/2021	Research filing in camera motions in S.D. Cal. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:12 2:34PM - 2:46PM	Andrea Reed 89.00 USD
03/11/2021	Research filing in camera motions in S.D. Cal. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:06 2:44PM - 2:50PM	Andrea Reed 44.50 USD
03/11/2021	Research filing in camera motions in S.D. Cal. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:18 2:44PM - 3:02PM	Andrea Reed 133.50 USD
03/11/2021	Strategy Call with Kevin & discussion re: motion for in camera review Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:54 3:00PM - 3:54PM	Andrea Reed 400.50 USD
03/11/2021	Quickbox -- Drafting reply to Quickbox Rule 11 Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	4:06 4:35PM - 8:41PM	Andrea Reed 1,824.50 USD
03/11/2021	Review Defendants' Motions for Sanctions, calendar all related deadlines, and prepare responses in opposition; review Order continuing hearing on motions to dismiss and calendar all related deadlines La Pura - Tan v Quickbox [LTAN-CA-200128]	3:36 5:55PM - 9:31PM	Suzy Garcia 486.00 USD
03/12/2021	Quickbox -- Drafting reply to Quickbox Rule 11 Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	8:54 12:15PM - 9:09PM	Andrea Reed 3,960.50 USD
03/12/2021	Research connection to QuickBox and merchant accounts and konnektive and other free trial scams Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	2:36 5:20PM - 7:56PM	Cyclone Covey 2,119.00 USD
03/13/2021	Review and save documents from Konnektive website relating to template free trial scam websites; select potential exhibits for Rule 11 response; message C. Covey regarding same. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	3:42 11:00AM - 2:42PM	Kevin Kneupper 3,015.50 USD
03/13/2021	review videos on Adele, review konnektive "miraclear" server, discuss w K Kneupper, download sites, review and download flexpay website and data Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	2:30 5:29PM - 7:59PM	Cyclone Covey 2,037.50 USD

03/14/2021	review more "miraclear" files manual download of select pages Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	1:00 9:51AM - 10:51AM	Cyclone Covey 815.00 USD
03/15/2021	Quickbox -- Drafting reply to Quickbox Rule 11 Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	1:30 2:44PM - 4:14PM	Andrea Reed 667.50 USD
03/15/2021	Quickbox -- drafting motion to submit documents in camera Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	2:36 4:24PM - 7:00PM	Andrea Reed 1,157.00 USD
03/15/2021	Meet and confer on motion to submit documents in camera - 2 conferences (Qb and Konnektive and then La Pura Defendants) Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:24 5:12PM - 5:36PM	Cyclone Covey 326.00 USD
03/15/2021	Quickbox -- drafting motion to submit documents in camera Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	1:48 7:05PM - 8:53PM	Andrea Reed 801.00 USD
03/15/2021	research in camera motions and orders on similar motions Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:54 7:23PM - 8:17PM	Cyclone Covey 733.50 USD
03/15/2021	call from La Pura attorney re: settlement, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:11PM - 8:23PM	Cyclone Covey 163.00 USD
03/15/2021	Quickbox -- drafting motion to submit documents in camera Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:42 9:11PM - 9:53PM	Andrea Reed 311.50 USD
03/16/2021	Quickbox -- drafting motion to submit documents in camera Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:18 9:54AM - 10:12AM	Andrea Reed 133.50 USD
03/16/2021	Quickbox -- drafting motion to submit documents in camera Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:12 10:33AM - 10:45AM	Andrea Reed 89.00 USD
03/16/2021	Quickbox -- drafting motion to submit documents in camera Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	4:36 10:52AM - 3:28PM	Andrea Reed 2,047.00 USD
03/16/2021	Quickbox -- Drafting reply to Quickbox Rule 11 Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	2:12 4:46PM - 6:58PM	Andrea Reed 979.00 USD
03/16/2021	Quickbox -- Drafting reply to Quickbox Rule 11 Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	1:00 7:15PM - 8:15PM	Andrea Reed 445.00 USD
03/16/2021	review and revise motion for submission of in camera materials, call w K Kneupper RE: same Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	1:06 9:23PM - 10:29PM	Cyclone Covey 896.50 USD
03/17/2021	Quickbox -- Drafting reply to Quickbox Rule 11 Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	3:24 10:55AM - 2:19PM	Andrea Reed 1,513.00 USD
03/17/2021	Quickbox -- Drafting reply to Quickbox Rule 11 Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	3:48 2:18PM - 6:06PM	Andrea Reed 1,691.00 USD

03/17/2021	Prepare Motion to Submit Materials for In Camera Review for filing La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 5:28PM - 6:16PM	Suzy Garcia
03/17/2021	Prepare Motion to Submit Materials for In Camera Review, declaration of Kevin Kneupper and Proposed Order for filing; prepare correspondence for Judge Huff and opposing counsel regarding same; correspond with K. Kneupper regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 7:21PM - 8:45PM	Suzy Garcia
03/18/2021	Quickbox -- Drafting reply to Quickbox Rule 11 Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	6:00 12:03PM - 6:03PM	Andrea Reed 2,670.00 USD
03/18/2021	review private label campaign, ecom logics, and other James Martell websites, save websites, discuss same with A Reed and K Kneupper Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	2:12 4:19PM - 6:31PM	Cyclone Covey 1,793.00 USD
03/18/2021	Quickbox -- Investigating and Saving eComLogics and Brand Innovate pages Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	3:06 5:59PM - 9:05PM	Andrea Reed 1,379.50 USD
03/18/2021	Quickbox -- Investigating and Saving eComLogics and Brand Innovate pages Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:18 9:54PM - 10:12PM	Andrea Reed 133.50 USD
03/19/2021	Quickbox -- eCom Logics/Brand Innovate/J Martell research and drafting Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	2:48 10:31AM - 1:19PM	Andrea Reed 1,246.00 USD
03/19/2021	Quickbox -- eCom Logics/Brand Innovate/J Martell research and drafting Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	5:24 1:42PM - 7:06PM	Andrea Reed 2,403.00 USD
03/19/2021	review notes from A Reed and discuss same with her on shell companies by J Martell Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:24 2:08PM - 2:32PM	Cyclone Covey 326.00 USD
03/19/2021	Draft response to Quick Box Rule 11 motion; review archived websites related to Quick Box Rule 11 motion; message C. Covey and A. Reed regarding archived Quick Box websites and Martell Group. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	3:54 3:42PM - 7:36PM	Kevin Kneupper 3,178.50 USD
03/19/2021	Quickbox -- eCom Logics/Brand Innovate/J Martell research and drafting Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	2:24 7:05PM - 9:29PM	Andrea Reed 1,068.00 USD
03/20/2021	Research issues relating to declarations for Quick Box Rule 11 motions; draft response to Quick Box Rule 11 motions. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	1:42 12:00PM - 1:42PM	Kevin Kneupper 1,385.50 USD
03/21/2021	Review and download konnektive api. Save additional load balancer references. Review konnektive LinkedIn profiles of employees, review konnektive subdomains. Message to K Kneupper re same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 8:13PM - 9:31PM	Cyclone Covey 1,059.50 USD
03/22/2021	review Rule 11 order from judge, discuss same w K Kneupper; assign witness interview memo project to A Reed and discuss same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:23AM - 10:47AM	Cyclone Covey 326.00 USD

03/22/2021	Draft response to Quick Box Rule 11 motion; review court order; conference with C. Covey regarding same; message A. Reed regarding order. Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	3:12 12:06PM - 3:18PM	Kevin Kneupper 2,608.00 USD
03/22/2021	Quickbox -- Drafting reply to Quickbox Rule 11 Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:54 12:58PM - 1:52PM	Andrea Reed 400.50 USD
03/22/2021	Quickbox -- Drafting reply to Quickbox Rule 11 Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	0:24 3:55PM - 4:19PM	Andrea Reed 178.00 USD
03/22/2021	Quickbox -- Drafting reply to Quickbox Rule 11 Rule 11 Motion - Tan v Quickbox [LTAN-CA-200128]	3:54 4:12PM - 8:06PM	Andrea Reed 1,735.50 USD
03/23/2021	Researching Rules on Interviewing Former Employees of Defendant Corporation; Composing Memo on Rules in California, Georgia, Colorado La Pura - Tan v Quickbox [LTAN-CA-200128]	3:24 8:45AM - 12:09PM	Andrea Reed 1,513.00 USD
03/23/2021	Editing Memo on Rules on Interviewing Former Employees of Defendant Corporation; Compose Memo on Rules in California, Georgia, Colorado La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:29PM - 12:47PM	Andrea Reed 133.50 USD
03/23/2021	Conference with C. Covey regarding Martell Group; e-mail D. Wright regarding document preservation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:24PM - 1:42PM	Kevin Kneupper 244.50 USD
03/23/2021	Review Order denying Defendants Rule 11 Motions and Plaintiff's In Camera Review Motion; calendar all related deadlines La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:30PM - 3:54PM	Suzy Garcia 54.00 USD
03/23/2021	Finishing and Submitting Memo on Interviewing Former Employees of Defendant Corporation; Compose Memo on Rules in California, Georgia, Colorado La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:30PM - 4:42PM	Andrea Reed 89.00 USD
03/23/2021	discussions w K Kneupper RE: emails concerning document preservation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:33PM - 8:45PM	Cyclone Covey 163.00 USD
03/24/2021	Research Update to Former Employee Communications Memo for the new GA Supreme Court Advisory Opinion La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:34PM - 1:52PM	Andrea Reed 133.50 USD
03/25/2021	Adding New Georgia Supreme Court Advisory Opinion; Researching and Editing Procedure for Documenting Compliance -- to Memo on Interviewing Former Employees La Pura - Tan v Quickbox [LTAN-CA-200128]	2:48 11:00AM - 1:48PM	Andrea Reed 1,246.00 USD
03/25/2021	Prepare Notice of Appearance of C. Covey; update pleadings and case file; correspond with C. Covey regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 12:54PM - 2:00PM	Suzy Garcia 148.50 USD
03/25/2021	Prepare Notice of Appearance of C. Covey; update pleadings and case file; conference call with C. Covey regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:18PM - 2:30PM	Suzy Garcia 27.00 USD

03/25/2021	Follow up Research on California Procedures for Compliance with the Rules; Searched for State Bar Guidance or Advisory Opinions Similar to CO and GA -- Memo on Interviewing Former Employees La Pura - Tan v Quickbox [LTAN-CA-200128]	4:12 2:25PM - 6:37PM	Andrea Reed 1,869.00 USD
03/30/2021	Review can calendar all related deadlines regarding motions to dismiss; review all orders substituting attorneys for Konnektive and Martorano defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 12:48PM - 1:42PM	Suzy Garcia 121.50 USD
03/31/2021	Review request for supplemental briefing; draft response; message C. Covey and S. Garcia regarding same; prepare for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:48 1:18PM - 4:06PM	Kevin Kneupper 2,282.00 USD
03/31/2021	Review motion for supplemental brief and TX case; discuss strategy on same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:04PM - 9:22PM	Cyclone Covey 244.50 USD
03/31/2021	Review Konnektive Defendants' Motion for Supplemental Briefing, prepare Plaintiff's Opposition and calendar all related deadlines; correspond with K. Kneupper regarding same La Pura - Tan v Quickbox [LTAN-CA-200128]	2:30 9:15PM - 11:45PM	Suzy Garcia 337.50 USD
04/01/2021	Review memo on communicating with corporate employees and GA, CA, and CO rules on same; locate former employees for Quickbox on LinkedIn and download all relevant profiles; locate former employees for Konnektive on LinkedIn and download all relevant profiles; research lawsuit involving scam between Konnektive former employee and T1 Payment Processor; research lawsuit with Konnektive files in GA in 2018 to determine if it shows relevant facts La Pura - Tan v Quickbox [LTAN-CA-200128]	3:36 10:36AM - 2:12PM	Cyclone Covey 2,934.00 USD
04/01/2021	Message C. Covey regarding Konnektive prior lawsuits and contact of attorney for J. Hall. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:12PM - 1:24PM	Kevin Kneupper 163.00 USD
04/07/2021	Review court order on motions to dismiss; review ENE orders from other cases and message C. Covey regarding settlement strategy. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:42PM - 1:12PM	Kevin Kneupper 407.50 USD
04/08/2021	Review Order denying defendants' motions to dismiss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:00AM - 2:24AM	Suzy Garcia 54.00 USD
04/08/2021	E-mail L. Tan regarding case update; message C. Covey regarding call with Konnektive counsel regarding pleading responses; e-mail C. Queally regarding pleading responses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:00PM - 12:24PM	Kevin Kneupper 326.00 USD
04/10/2021	Organize saved materials from Rule 11 investigation; investigate J. Martell business holdings; message and conference with C. Covey regarding J. Martell. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:18 12:48PM - 5:06PM	Kevin Kneupper 3,504.50 USD
04/11/2021	Phone call with Jared Hall's former attorney about document preservation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:40PM - 3:46PM	Cyclone Covey 81.50 USD
04/12/2021	Locate Address for Jared Hall, draft document preservation letter to him La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:09PM - 2:03PM	Cyclone Covey 733.50 USD

04/12/2021	Conference with C. Covey regarding third party former employees of Defendants; review LinkedIn with C. Covey for potential witnesses; review Private Label Campaigns / Quick Box graphic designer documents and message C. Covey regarding same; review letter to J. Hall and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 1:18PM - 3:36PM	Kevin Kneupper 1,874.50 USD
04/12/2021	Look for former employees online for Quickbox, Konnektive, and Private Label Campaigns; save all relevant files including LinkedInProfiles; extended conference w K Kneupper RE: same; create spreadsheet for contacting former employees as witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	2:48 5:42PM - 8:30PM	Cyclone Covey 2,282.00 USD
04/13/2021	Conference with C. Covey regarding settlement / ENE strategy; review Local Rules on ENE's; e-mail C. Queally regarding ENE orders. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 12:00PM - 12:48PM	Kevin Kneupper 652.00 USD
04/13/2021	Finalize and mail letter to Jared Hall and counsel RE: document preservation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:49PM - 3:07PM	Cyclone Covey
04/13/2021	Discussion w K Kneupper about ENE, effect of potential cross claims among defendants, possible mediation strategies, and how to communicate w opposing counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:04PM - 3:34PM	Cyclone Covey 407.50 USD
04/14/2021	Review documents regarding witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 8:21PM - 9:03PM	Suzy Garcia 94.50 USD
04/15/2021	Conference with C. Covey regarding witness list La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 4:50PM - 5:26PM	Suzy Garcia 81.00 USD
04/16/2021	Review sites using Konnektive API and scripts, save same La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 8:42AM - 10:06AM	Cyclone Covey 1,141.00 USD
04/17/2021	Watch J. Butcher MCLE regarding ENE process and discovery rules; review chambers rules; message C. Covey regarding Butcher procedures (NOTE: 1.4 hours on these tasks split with Sihler v Fulfillment Lab); organize and review LinkedIn profiles relating to Private Label Campaigns (.3 hours). La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 12:42PM - 1:42PM	Kevin Kneupper 815.00 USD
04/18/2021	Research issues relating to Konnektive indemnification and contribution claims and analyze effect on settlement discussions. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 12:00PM - 1:18PM	Kevin Kneupper 1,059.50 USD
04/19/2021	Review LinkedIn profiles regarding witness list La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 2:36PM - 3:24PM	Suzy Garcia 108.00 USD
04/19/2021	Review LinkedIn profiles regarding witness list La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:06PM - 6:30PM	Suzy Garcia 54.00 USD
04/20/2021	Draft ENE statement. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:18 12:00PM - 4:18PM	Kevin Kneupper 3,504.50 USD
04/20/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 3:07PM - 4:49PM	Suzy Garcia 229.50 USD

04/20/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	2:12 5:30PM - 7:42PM	Suzy Garcia 297.00 USD
04/21/2021	Review answers and third party complaints; research issues relating to cross-claims; message C. Covey regarding strategic decisions relating to settlement; draft ENE statement. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:42 12:00PM - 6:42PM	Kevin Kneupper 5,460.50 USD
04/21/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:52PM - 1:58PM	Suzy Garcia 13.50 USD
04/21/2021	Review Order Setting Early Neutral Evaluation and prepare shells for same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:54PM - 2:30PM	Suzy Garcia 81.00 USD
04/21/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 3:15PM - 4:15PM	Suzy Garcia 135.00 USD
04/21/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:42PM - 4:48PM	Suzy Garcia 13.50 USD
04/21/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:42PM - 4:48PM	Suzy Garcia 13.50 USD
04/21/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	4:24 4:42PM - 9:06PM	Suzy Garcia 594.00 USD
04/22/2021	Edit ENE statement; message with and conference with C. Covey regarding preparation of ENE presentation. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:54 1:18PM - 5:12PM	Kevin Kneupper 3,178.50 USD
04/22/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:40PM - 2:46PM	Suzy Garcia 13.50 USD
04/22/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:40PM - 2:46PM	Suzy Garcia 13.50 USD
04/22/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 2:43PM - 4:49PM	Suzy Garcia 283.50 USD
04/22/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 5:57PM - 6:33PM	Suzy Garcia 81.00 USD
04/22/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 7:14PM - 8:02PM	Suzy Garcia 108.00 USD

04/22/2021	Discuss strategy for ENE w K Kneupper and methods for reviewing evidence and strategy for approaching the defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:14PM - 8:38PM	Cyclone Covey 326.00 USD
04/23/2021	Conference with C. Covey regarding contacting former employees; review spreadsheet; review lawsuit against Konnektive by N. Acker; e-mail N. Acker's attorneys regarding document preservation for Konnektive; conference with C. Covey, K. Kronenberger, and J. Rosenfeld regarding ENE; conference with C. Covey regarding investigation of Konnektive templates. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 12:00PM - 2:42PM	Kevin Kneupper 2,200.50 USD
04/23/2021	Review Defendants' Answers and calendar all related deadlines La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:42PM - 3:00PM	Suzy Garcia 40.50 USD
04/23/2021	Review airpod scam page and the Konnektive elements on the page, same all files, discuss same with K Kneupper; phone call with La Pura defendant counsel; review photos of Konnektive at ASW party in 2020; begin creating presentation for ENE conference La Pura - Tan v Quickbox [LTAN-CA-200128]	4:48 2:57PM - 7:45PM	Cyclone Covey 3,912.00 USD
04/23/2021	Phone call w ex-PLS employee Robyn Spann, record notes and calendar next call with her La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:45PM - 7:57PM	Cyclone Covey 163.00 USD
04/23/2021	Phone call w ex-Konnektive Dario Sumlin, record notes and calendar next call with him, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:51PM - 8:09PM	Cyclone Covey 244.50 USD
04/24/2021	Investigate Kiet Lieu, Thai Lieu, Thaiwink Media, and potential other doe(s); conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:48 12:00PM - 3:48PM	Kevin Kneupper 3,097.00 USD
04/25/2021	Add individuals from defaulted La Pura Defendants to spreadsheet of third parties to contact; message C. Covey regarding same; analyze settlement issues and message and conference with C. Covey regarding same; e-mail K. Kronenberger regarding document preservation; review J. Martell and S. Adele answers and take notes on factual admissions. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:42 2:54PM - 7:36PM	Kevin Kneupper 3,830.50 USD
04/25/2021	Discussion and chat w K Kneupper RE: identity of RMG owners and proposed document preservation notice to opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:57PM - 10:09PM	Cyclone Covey 163.00 USD
04/26/2021	Message with and conference with C. Covey regarding calls with former employees of defendants; message C. Covey regarding C. Queally e-mail; review answers from La Pura Defendants, Konnektive Corp., Konnektive Rewards, and Konnektive LLC and edit notes file regarding admissions. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:36 12:00PM - 6:36PM	Kevin Kneupper 5,379.00 USD
04/26/2021	Prepare Initial Disclosures La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 1:23PM - 2:29PM	Suzy Garcia
04/26/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:36PM - 3:48PM	Suzy Garcia 27.00 USD

04/26/2021	Phone calls to former Konnektive employees, take notes, discuss same w K Kneupper; phone call to PLC former employee; review file and continue presentation prep for ENE La Pura - Tan v Quickbox [LTAN-CA-200128]	2:12 5:40PM - 7:52PM	Cyclone Covey 1,793.00 USD
04/27/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 2:00AM - 3:00AM	Suzy Garcia 135.00 USD
04/27/2021	Review M. Martorano answer and edit notes on facts from answers; edit ENE statement; conference with C. Covey regarding calls and review calls; conference with K. Kronenberger, J. Rosenfeld, and C. Covey regarding settlement issues; research issues relating to contacting former employees and conference with C. Covey regarding response to C. Queally letter; draft response to C. Queally letter. La Pura - Tan v Quickbox [LTAN-CA-200128]	10:42 12:24PM - 11:06PM	Kevin Kneupper 8,720.50 USD
04/27/2021	Review Answers to the first amended complaint from defendants, cross-complaints and third party complaints; prepare same for attorney review and calendar all related deadlines; review case summary pura Dkt. 10 La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:46PM - 3:04PM	Suzy Garcia 40.50 USD
04/27/2021	Review Answers to the first amended complaint from defendants, cross-complaints and third party complaints; prepare same for attorney review and calendar all related deadlines; review case summary pura Dkt. 10 La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 3:09PM - 4:15PM	Suzy Garcia 148.50 USD
04/27/2021	Calls w former Konnektive employees, discuss same w K Kneupper; review email from La Pura defendants' counsel, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 5:03PM - 6:57PM	Cyclone Covey 1,548.50 USD
04/27/2021	Review Answers to the first amended complaint from defendants, cross-complaints and third party complaints; prepare same for attorney review and calendar all related deadlines; review case summary pura Dkt. 10 La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 6:03PM - 7:39PM	Suzy Garcia 216.00 USD
04/27/2021	Call w La Pura Defendants' counsel RE: settlement and call w K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 7:48PM - 8:36PM	Cyclone Covey 652.00 USD
04/27/2021	Research CA and GA law on ability to enforce employee confidentiality agreements to prevent former employees from discussing the case in informal interviews La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 8:22PM - 10:40PM	Cyclone Covey 1,874.50 USD
04/28/2021	Review Order setting early neutral evaluation and calendar all related deadlines La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 11:51AM - 12:21PM	Suzy Garcia 67.50 USD
04/28/2021	Research issues regarding C. Queally letter on NDA's; draft response to C. Queally; message C. Covey regarding same; e-mail opposing counsel; review A. Lovelace call; search for unidentified individual in Instagram post fired by S. Adele; review Quick Box LLC answer and edit notes file; message C. Covey regarding J. Palmer. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:48 12:00PM - 8:48PM	Kevin Kneupper 7,172.00 USD
04/28/2021	Phone calls and interviews of former QB and PLC employees La Pura - Tan v Quickbox [LTAN-CA-200128]	3:18 4:30PM - 7:48PM	Cyclone Covey 2,689.50 USD

04/28/2021	Review draft response to Konnektive's threat to stop contacting former employees La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:43PM - 5:55PM	Cyclone Covey 163.00 USD
04/28/2021	Phone call with client about ENE and email to client RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:57PM - 6:21PM	Cyclone Covey 326.00 USD
04/28/2021	Prepare first set of requests for production of documents to defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:06PM - 6:30PM	Suzy Garcia 54.00 USD
04/28/2021	Prepare first set of requests for production of documents to defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 11:42PM - 12:18AM ⁺¹	Suzy Garcia 81.00 USD
04/29/2021	Conference with C. Covey regarding ENE; research contribution issue; draft slides on RICO contribution question; review Quick Box and Biggins answer and edit notes document. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:42 12:00PM - 4:42PM	Kevin Kneupper 3,830.50 USD
04/29/2021	Review and correct transcripts of recordings with Konnektive former employees La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 12:59PM - 2:59PM	Cyclone Covey 1,630.00 USD
04/29/2021	Prepare first set of requests for production of documents to defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 3:30PM - 4:48PM	Suzy Garcia 175.50 USD
04/29/2021	Prepare first set of requests for production of documents to defendants; prepare spreadsheet regarding written discovery served on defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	2:30 4:58PM - 7:28PM	Suzy Garcia 337.50 USD
04/29/2021	Phone calls to potential witnesses - Quickbox and PLC former employees La Pura - Tan v Quickbox [LTAN-CA-200128]	2:48 6:49PM - 9:37PM	Cyclone Covey 2,282.00 USD
04/30/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:12PM - 12:36PM	Suzy Garcia 54.00 USD
04/30/2021	Conference with K. Kronenberger; J. Rosenfeld; and C. Covey regarding settlement; conference with C. Covey regarding same; draft initial disclosures; review documents relating to Konnektive and load balancer and conference with C. Covey regarding theories about cascading MIDs and general software operation; review calls to Quick Box former employees and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:36 12:18PM - 7:54PM	Kevin Kneupper 6,194.00 USD
04/30/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 1:17PM - 2:29PM	Suzy Garcia 162.00 USD
04/30/2021	Review complaint in Nevada case against Konnektive, phone call with La Pura Defendants counsel, phone call w K Kneupper RE: same, review transcript of past calls, conduct calls w former QB employees and take notes RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	3:12 10:12PM - 1:24AM ⁺¹	Cyclone Covey 2,608.00 USD

05/01/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 8:55AM - 10:43AM	Suzy Garcia 243.00 USD
05/01/2021	Draft e-mail to C. Queally; message C. Covey regarding same; e-mail opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 12:00PM - 12:48PM	Kevin Kneupper 652.00 USD
05/02/2021	Research issues relating to potential motion on Konnektive NDA's. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:36PM - 4:00PM	Kevin Kneupper 326.00 USD
05/02/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 9:52PM - 11:04PM	Suzy Garcia 162.00 USD
05/03/2021	Research issues relating to NDA's; e-mail C. Queally regarding NDA threats by Konnektive; message C. Covey regarding Konnektive interviews. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 12:00PM - 1:06PM	Kevin Kneupper 896.50 USD
05/03/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:19PM - 1:43PM	Suzy Garcia 54.00 USD
05/03/2021	Review case law cited by opposing counsel RE: advisory opinion on NDAs, message to K Kneupper RE: same; phone call w K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:24PM - 6:54PM	Cyclone Covey 407.50 USD
05/04/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 2:00AM - 3:12AM	Suzy Garcia 162.00 USD
05/04/2021	E-mail M. Owens regarding potential witness regarding Konnektive; watch Konnektive videos regarding merchant accounts and review updates to Konnektive wiki relating to recycle billing and other features; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 12:00PM - 2:36PM	Kevin Kneupper 2,119.00 USD
05/04/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	3:00 2:01PM - 5:01PM	Suzy Garcia 405.00 USD
05/05/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 11:44AM - 1:08PM	Suzy Garcia 189.00 USD
05/05/2021	Review Tracers files and LinkedIn profiles, and update spreadsheet with witnesses' contact information La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 3:00PM - 4:18PM	Suzy Garcia 175.50 USD
05/05/2021	Call with former Konnektive employee J Hall La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:20PM - 7:32PM	Cyclone Covey 163.00 USD
05/05/2021	Save Konnektive FB videos, save selected Konnektive knowledge base web pages, review old Konnektive website saves La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 8:02PM - 8:50PM	Cyclone Covey 652.00 USD

05/10/2021	Prepare first set of requests for production of documents to defendants; prepare spreadsheet regarding written discovery served on defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:23PM - 3:47PM	Suzy Garcia 54.00 USD
05/10/2021	calls to former PLC employees (all voicemail) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:55PM - 5:07PM	Cyclone Covey 163.00 USD
05/12/2021	Review La Pura motion to dismiss and message C. Covey regarding same; message C. Covey regarding ENE presentation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 3:06PM - 3:42PM	Kevin Kneupper 489.00 USD
05/12/2021	Review correspondence from Christopher Queally regarding representation of Konnektive defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 3:22PM - 3:58PM	Suzy Garcia 81.00 USD
05/13/2021	Conference with M. Owens regarding lawsuit against Konnektive LLC relating to Six CRM and possible relation here. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:30PM - 1:42PM	Kevin Kneupper 163.00 USD
05/13/2021	Prepare first set of requests for production of documents to defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:10PM - 4:16PM	Suzy Garcia 13.50 USD
05/13/2021	Review Motion to Dismiss filed by defendants (Dkt No. 151) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:12PM - 4:36PM	Suzy Garcia 54.00 USD
05/13/2021	Prepare first set of requests for production of documents to defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:31PM - 4:43PM	Suzy Garcia 27.00 USD
05/13/2021	Prepare first set of requests for production of documents to defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 5:53PM - 6:59PM	Suzy Garcia 148.50 USD
05/18/2021	Research issues relating to hammer clauses; message C. Covey regarding possible use for insurance policies from Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 12:00PM - 1:42PM	Kevin Kneupper 1,385.50 USD
05/20/2021	Draft requests for production. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 1:54PM - 4:30PM	Kevin Kneupper 2,119.00 USD
05/23/2021	Review and investigate e-mail from B. Thompson regarding Konnektive text messages; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:00PM - 12:18PM	Kevin Kneupper 244.50 USD
05/24/2021	Draft requests for production. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 2:12PM - 4:36PM	Kevin Kneupper 1,956.00 USD
05/26/2021	Interview B. Thompson as potential witness regarding ongoing Konnektive fraud activity; investigate allegations; conference with and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 2:12PM - 4:48PM	Kevin Kneupper 2,119.00 USD
05/27/2021	Review case docket and update all pleadings La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:22PM - 2:46PM	Suzy Garcia 54.00 USD

05/28/2021	Review responses to motion to dismiss. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 1:54PM - 3:00PM	Kevin Kneupper 896.50 USD
05/29/2021	Draft notice of partial joinder in La Pura Defendants' MTD third party complaints. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:54 1:36PM - 5:30PM	Kevin Kneupper 3,178.50 USD
05/31/2021	Draft notice of partial joinder. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 4:00PM - 6:18PM	Kevin Kneupper 1,874.50 USD
06/01/2021	Review notice of partial joinder and conference with S. Garcia regarding filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:12PM - 4:42PM	Kevin Kneupper 407.50 USD
06/01/2021	Prepare notice of joinder to La Pura defendants' motion to dismiss for filing and conference call with Kevin Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 10:40PM - 12:04AM ⁺¹	Suzy Garcia 189.00 USD
06/02/2021	Prepare notice of joinder to La Pura defendants' motion to dismiss for filing and conference call with Kevin Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:39AM - 12:51AM	Suzy Garcia 27.00 USD
06/02/2021	Review Defendants' oppositions to La Pura Defendants' motion to dismiss cross-complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:47AM - 12:53AM	Suzy Garcia 13.50 USD
06/02/2021	Review Defendants' oppositions to La Pura Defendants' motion to dismiss cross-complaint; review case docket and future hearings and deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:52AM - 1:10AM	Suzy Garcia 40.50 USD
06/02/2021	E-mail opposing counsel regarding Rule 26(f) conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:36PM - 6:42PM	Kevin Kneupper 81.50 USD
06/04/2021	Emails scheduling 26(f) conference La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:14PM - 2:20PM	Cyclone Covey 81.50 USD
06/05/2021	Review documents relating to corporate defendants to identify individuals for initial disclosures; draft initial disclosures; analyze potential witnesses for strategy to identify Doe(s). La Pura - Tan v Quickbox [LTAN-CA-200128]	4:42 3:12PM - 7:54PM	Kevin Kneupper 3,830.50 USD
06/06/2021	Identify deposition targets; draft notice of deposition; draft interrogatories to Konnektive Defendants; draft requests for inspection to Konnektive Defendants and La Pura Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 12:48PM - 3:30PM	Kevin Kneupper 2,200.50 USD
06/07/2021	Prepare for and attend Rule 26(f) conference; draft requests for inspection and interrogatories to Konnektive; message S. Garcia regarding service of same; draft requests for production to Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:36 12:00PM - 3:36PM	Kevin Kneupper 2,934.00 USD
06/07/2021	Conduct 26(f) conference, discuss ESI and specific issues RE: discovery disputes w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 3:10PM - 4:10PM	Cyclone Covey 815.00 USD

06/07/2021	Prepare interrogatories to Konnektive defendants and requests for inspection to Konnektive defendants and La Pura Defendants, serve on opposing counsel, calendar all deadlines, and correspond with Kevin Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 7:33PM - 9:09PM	Suzy Garcia 216.00 USD
06/08/2021	Draft Konnektive RFP's; review case materials to identify requests; edit initial disclosures draft based on review. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:36 3:00PM - 8:36PM	Kevin Kneupper 4,564.00 USD
06/08/2021	Review FB video of Konnektive and PaySafe, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:30PM - 9:48PM	Cyclone Covey 244.50 USD
06/09/2021	Email client RE: practice zoom before ENE and to get copies or her bank statments La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:41AM - 8:47AM	Cyclone Covey 81.50 USD
06/09/2021	Draft Konnektive RFP's and review case materials to identify proof holes; message S. Garcia regarding service; review online videos relating to FunnelKonnekt and Konnektive programming activities; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:36 12:30PM - 9:06PM	Kevin Kneupper 7,009.00 USD
06/09/2021	Review Order for third-party to respond to third-party complaints..... La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 12:31PM - 1:37PM	Suzy Garcia 148.50 USD
06/09/2021	Review Order for third-party to respond to third-party complaints; download all pleadings; calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:23PM - 3:35PM	Suzy Garcia 27.00 USD
06/09/2021	Prepare Plaintiff's requests for production of documents to Konnektive Defendants (Set 1), serve and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 8:53PM - 9:23PM	Suzy Garcia 67.50 USD
06/09/2021	Draft initial version of joint discovery plan La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 9:22PM - 11:58PM	Cyclone Covey 2,119.00 USD
06/09/2021	Prepare Plaintiff's requests for production of documents to Konnektive Defendants (Set 1), serve and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:48PM - 10:18PM	Suzy Garcia 67.50 USD
06/09/2021	Discussion w K Kneupper RE: discovery of Konnektive's JIRA system La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:58PM - 12:16AM ⁺¹	Cyclone Covey 244.50 USD
06/10/2021	Draft requests for production to La Pura Defendants; review case materials to determine document categories to request. La Pura - Tan v Quickbox [LTAN-CA-200128]	9:18 12:42PM - 10:00PM	Kevin Kneupper 7,579.50 USD
06/11/2021	Prepare Plaintiff's first request for production of documents to La Pura Defendants and serve on Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:47AM - 1:23AM	Suzy Garcia 81.00 USD
06/11/2021	Message C. Covey regarding Response CRM subpoena; message S. Garcia regarding serving RFP's on La Pura Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:06PM - 12:12PM	Kevin Kneupper 81.50 USD

06/11/2021	Prepare Plaintiff's first request for production of documents to La Pura Defendants and serve on Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:33PM - 1:57PM	Suzy Garcia 54.00 USD
06/11/2021	Review law on subpoenas and service when ESI is involved, review law on waiving service for a Rule 45 subpoena, draft requests for Response CRM and review underlying documents RE: same, review law on service and notifying opposing parties La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 3:32PM - 4:14PM	Cyclone Covey 570.50 USD
06/13/2021	Review K Kneupper's revisions to Joint Case Management Statement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:29PM - 7:41PM	Cyclone Covey 163.00 USD
06/14/2021	Conference with C. Covey regarding joint discovery plan and circulate draft to opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:00PM - 12:12PM	Kevin Kneupper 163.00 USD
06/14/2021	Correspond with Karl Kronenberger regardign word versiono of requests for production to La Pura Defendants, prepare word document and email to Mr. Kronenberger; update service list. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 4:16PM - 4:52PM	Suzy Garcia 81.00 USD
06/14/2021	Prep for ENE - assemble recordings, analyze parts to present La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 6:29PM - 7:23PM	Cyclone Covey 733.50 USD
06/14/2021	Review emails RE: stipulation on ENE La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:23PM - 7:29PM	Cyclone Covey 81.50 USD
06/14/2021	Review stipulation regarding La Pura representative at ENE and e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:32PM - 9:50PM	Kevin Kneupper 244.50 USD
06/14/2021	Draft RFP's to Quick Box Defendants and review case materials for potential requests. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:18 9:50PM - 3:08AM ⁺¹	Kevin Kneupper 4,319.50 USD
06/15/2021	Review and edit audio files for ENE presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	6:30 4:27AM - 10:57AM	Cyclone Covey 5,297.50 USD
06/15/2021	Conference with C. Covey regarding preparation of audio files for ENE for Quick Box and Konnektive interviews. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:14PM - 4:26PM	Kevin Kneupper 163.00 USD
06/15/2021	Draft RFP's to Quick Box Defendants and review case materials for potential requests. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:36 4:26PM - 9:02PM	Kevin Kneupper 3,749.00 USD
06/16/2021	Review Joint Motion to Authorize Single Representative to Attend ENE, filed by La Pura Defendants; review docket and update pleadings. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:57AM - 2:21AM	Suzy Garcia 54.00 USD
06/16/2021	Draft ESI letter outline w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:03AM - 3:33AM	Cyclone Covey 407.50 USD
06/16/2021	Conference with C. Covey regarding ESI letter to Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:02AM - 7:26AM	Kevin Kneupper 326.00 USD

06/16/2021	Review audio and other files, prepare for ENE, create video La Pura - Tan v Quickbox [LTAN-CA-200128]	4:36 10:27PM - 3:03AM ⁺¹	Cyclone Covey 3,749.00 USD
06/17/2021	Draft ESI preservation letter to La Pura Defendants, note to K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 9:39PM - 10:03PM	Cyclone Covey 326.00 USD
06/17/2021	Prepare ENE presentation and videos La Pura - Tan v Quickbox [LTAN-CA-200128]	6:36 10:03PM - 4:39AM ⁺¹	Cyclone Covey 5,379.00 USD
06/18/2021	Zoom w client to prep for ENE La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:11PM - 12:23PM	Cyclone Covey 163.00 USD
06/18/2021	Prepare ENE presentation - work on captions for Martarano videos La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 12:23PM - 2:23PM	Cyclone Covey 1,630.00 USD
06/20/2021	Edit ENE statement and research issues associated with legal positions. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 5:30PM - 7:00PM	Kevin Kneupper 1,222.50 USD
06/21/2021	Edit ENE statement. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 4:11AM - 5:35AM	Kevin Kneupper 1,141.00 USD
06/21/2021	Review and edit draft subpoena to Response CRM and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:17AM - 6:47AM	Kevin Kneupper 407.50 USD
06/21/2021	Review and comment on ENE presentation demonstration; message C. Covey with webpages to add as slides. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 6:47AM - 8:11AM	Kevin Kneupper 1,141.00 USD
06/21/2021	Draft RFP's to Quick Box Defendants and review case documents for categories needed. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:18 8:11AM - 1:29PM	Kevin Kneupper 4,319.50 USD
06/21/2021	Research requirements for 3rd party subpoenas La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:45PM - 5:09PM	Cyclone Covey 326.00 USD
06/21/2021	Prepare ENE presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	4:00 6:09PM - 10:09PM	Cyclone Covey 3,260.00 USD
06/22/2021	Prepare first set of requests for production of documents to Quick Box Defendants, serve and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 1:32PM - 2:56PM	Suzy Garcia 189.00 USD
06/22/2021	Review subpoena to Response CRM; conference with C. Covey regarding same; message S. Garcia regarding service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:29PM - 2:53PM	Kevin Kneupper 326.00 USD
06/22/2021	Review C. Covey comments to ENE statement and edit same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:53PM - 3:05PM	Kevin Kneupper 163.00 USD
06/22/2021	Draft RFP's to Quick Box Defendants; message S. Garcia regarding service. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 3:05PM - 5:23PM	Kevin Kneupper 1,874.50 USD

06/22/2021	Revise ENE presentation based on K Kneupper's comments La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 3:44PM - 4:44PM	Cyclone Covey 815.00 USD
06/22/2021	Research requirements for 3rd party subpoenas, draft memo RE: same, revise subpoena to Response CRM based on research results La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 3:51PM - 4:39PM	Cyclone Covey 652.00 USD
06/22/2021	Prepare first set of requests for production of documents to Quick Box Defendants and subpoena to Response CRM, serve and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 4:00PM - 4:48PM	Suzy Garcia 108.00 USD
06/22/2021	Draft initial disclosures. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 5:23PM - 7:11PM	Kevin Kneupper 1,467.00 USD
06/22/2021	Prepare first set of requests for production of documents to Quick Box Defendants, serve and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:38PM - 7:02PM	Suzy Garcia 54.00 USD
06/23/2021	Review video of Konnektive and black box, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:44PM - 1:08PM	Cyclone Covey 326.00 USD
06/23/2021	Review timeline drafted by K Kneupper for ENE submission La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:08PM - 1:14PM	Cyclone Covey 81.50 USD
06/23/2021	Review final version of joint discovery plan La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:15PM - 6:33PM	Cyclone Covey 244.50 USD
06/23/2021	Prepare plaintiffs initial disclosures and serve on all parties; correspond with Kevin Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 7:43PM - 8:19PM	Suzy Garcia 81.00 USD
06/23/2021	Prepare Joint Discovery Plan for filing, calendar all related events and correspond with Kevin Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 11:13PM - 12:01AM ⁺¹	Suzy Garcia 108.00 USD
06/24/2021	Draft letter to D. Wright regarding Quick Box failure to provide insurance agreements in initial disclosures; research legal issues relating to same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:12 3:17PM - 5:29PM	Kevin Kneupper 1,793.00 USD
06/24/2021	Review emails from defendants regarding Initial Disclosures; review Order authorizing single representative to attend ENE; and update pleadings and discovery files. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:00PM - 9:18PM	Suzy Garcia 40.50 USD
06/25/2021	Phone call with Judge's clerk RE: ENE presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:08AM - 12:20AM	Cyclone Covey 163.00 USD
06/25/2021	Message C. Covey regarding Response CRM e-mails; e-mail Rome & Associates re: contact with Response CRM; e-mail M. Brooks regarding subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:47PM - 7:05PM	Kevin Kneupper 244.50 USD
06/25/2021	Review email from Response CRM, phone call w K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:35PM - 8:53PM	Cyclone Covey 244.50 USD

06/25/2021	Review insurance policies from Quick Box; message C. Covey thoughts and analysis. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 11:47PM - 1:35AM ⁺¹	Kevin Kneupper 1,467.00 USD
06/26/2021	Research bad faith issues relating to Quick Box insurance policies. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 3:35AM - 5:53AM	Kevin Kneupper 1,874.50 USD
06/27/2021	Work on ENE video La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 5:26PM - 7:44PM	Cyclone Covey 1,874.50 USD
06/28/2021	Phone call w Response CRM about documents, discuss same with K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:20AM - 12:56AM	Cyclone Covey 489.00 USD
06/28/2021	Review and approve subpoena for service La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:56AM - 1:02AM	Cyclone Covey 81.50 USD
06/28/2021	Review ENE presentation; message C. Covey comments. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:35AM - 2:11AM	Kevin Kneupper 489.00 USD
06/28/2021	Research bad faith issues relating to Quick Box insurance policies. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 2:41AM - 3:35AM	Kevin Kneupper 733.50 USD
06/28/2021	Revise ENE Video based on K Kneupper comments, finalize, render, and upload La Pura - Tan v Quickbox [LTAN-CA-200128]	4:24 7:44PM - 12:08AM ⁺¹	Cyclone Covey 3,586.00 USD
06/29/2021	Review and analysis Konnektive subpoena to Paysafe; message C. Covey regarding theories about same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:04PM - 6:22PM	Kevin Kneupper 244.50 USD
06/29/2021	Review K. Lieu and RMG responses to third party complaints. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 9:34PM - 9:58PM	Kevin Kneupper 326.00 USD
06/29/2021	Research Rule 406 issues and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 10:04PM - 11:46PM	Kevin Kneupper 1,385.50 USD
06/30/2021	E-mail C. Queally regarding deadline extension request. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:01AM - 3:07AM	Kevin Kneupper 81.50 USD
06/30/2021	Research issues relating to partial settlement timing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:07AM - 3:31AM	Kevin Kneupper 326.00 USD
06/30/2021	Review Konnektive motion to bifurcate; e-mail C. Covey regarding same; research issues regarding proximate cause issue. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 3:31AM - 4:13AM	Kevin Kneupper 570.50 USD
06/30/2021	ENE Conference La Pura - Tan v Quickbox [LTAN-CA-200128]	3:24 11:53AM - 3:17PM	Cyclone Covey 2,771.00 USD
06/30/2021	Review Third-Party Answers to complaint and Joint Motion to Bifurcate; calendar all related deadlines; and prepare shells for opposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 4:24PM - 5:30PM	Suzy Garcia 148.50 USD

06/30/2021	Prepare for and attend ENE conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:06 8:55PM - 1:01AM ⁺¹	Kevin Kneupper 3,341.50 USD
07/01/2021	Conference with and message C. Covey regarding settlement options. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:01AM - 1:19AM	Kevin Kneupper 244.50 USD
07/01/2021	Conference with K. Kronenberger regarding settlement options and ENE. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:19AM - 1:43AM	Kevin Kneupper 326.00 USD
07/01/2021	Draft list of questions for La Pura Defendants relating to settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:43AM - 2:19AM	Kevin Kneupper 489.00 USD
07/01/2021	Review scheduling order. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:55AM - 7:07AM	Kevin Kneupper 163.00 USD
07/01/2021	Review La Pura Defendants' answers. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:07AM - 7:31AM	Kevin Kneupper 326.00 USD
07/02/2021	Review draft e-mail to client and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:28PM - 7:34PM	Kevin Kneupper 81.50 USD
07/05/2021	Draft list of questions for K Liu in discovery La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 3:59PM - 4:41PM	Cyclone Covey 570.50 USD
07/06/2021	Review video from Response CRM; e-mail M. Brooks. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:46AM - 11:10AM	Kevin Kneupper 326.00 USD
07/07/2021	Review draft protective order and e-mail C. Queally regarding proposed redline. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:22PM - 10:34PM	Kevin Kneupper 163.00 USD
07/08/2021	Phone call w Response CRM on Konnektive La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:18PM - 4:48PM	Cyclone Covey 407.50 USD
07/08/2021	Conference with C. Covey and M. Brooks regarding Response CRM subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 10:34PM - 11:46PM	Kevin Kneupper 978.00 USD
07/12/2021	Prepare document production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 4:04PM - 4:46PM	Suzy Garcia 94.50 USD
07/12/2021	Prepare document production. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 6:12PM - 7:12PM	Suzy Garcia 135.00 USD
07/12/2021	E-mail K. Kronenberger regarding settlement discussions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:28PM - 11:34PM	Kevin Kneupper 81.50 USD
07/13/2021	Review RFP's to Konnektive Defendants for prioritization and e-mail C. Queally regarding prioritization of discovery. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:10AM - 12:34AM	Kevin Kneupper 326.00 USD

07/13/2021	E-mail C. Queally regarding requests for production of documents. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:16AM - 3:28AM	Kevin Kneupper 163.00 USD
07/13/2021	Research issue relating to model ESI order from e-mail from C. Queally; e-mail C. Queally regarding ESI issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 3:28AM - 4:10AM	Kevin Kneupper 570.50 USD
07/14/2021	E-mail C. Queally regarding discovery issues; research ESI issue. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 4:10AM - 5:16AM	Kevin Kneupper 896.50 USD
07/15/2021	Research service issues for Paysafe; draft Paysafe subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 6:52AM - 7:46AM	Kevin Kneupper 733.50 USD
07/15/2021	E-mail C. Queally regarding discovery issues and meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:52AM - 8:16AM	Kevin Kneupper 326.00 USD
07/15/2021	Research issues relating to requests for inspection; e-mail K. Kronenberger regarding response to requests for inspection. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:10AM - 10:34AM	Kevin Kneupper 326.00 USD
07/15/2021	Message S. Garcia regarding locations for depositions of La Pura witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:34AM - 10:40AM	Kevin Kneupper 81.50 USD
07/15/2021	Prepare subpoena to Paysafe Group Limited; correspond with third party regarding service; correspond with Kevin Kneupper; and serve Subpoena on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 6:42PM - 8:00PM	Suzy Garcia 175.50 USD
07/16/2021	Draft 30(b)(1) notices for Kiet Lieu and Tuan Huynh; message S. Garcia regarding arranging deposition logistics and service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:33AM - 3:57AM	Kevin Kneupper 326.00 USD
07/16/2021	E-mail Paysafe counsel regarding subpoena waiver of service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:57AM - 4:03AM	Kevin Kneupper 81.50 USD
07/16/2021	E-mail J. Rosenfeld regarding request to inspect and meet and confer issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:03AM - 4:09AM	Kevin Kneupper 81.50 USD
07/16/2021	Update master proof of service and notes regarding parties to serve. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:41PM - 2:47PM	Suzy Garcia 13.50 USD
07/16/2021	Correspond with third party vendors regarding reservation of conference rooms for depositions in late August; correspond with Kevin Kneuper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:45PM - 3:09PM	Suzy Garcia 54.00 USD
07/16/2021	Review Defendants' Subpoena to Paysafe Group and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:31PM - 6:01PM	Suzy Garcia 67.50 USD

07/16/2021	Correspond with third party vendors regarding reservation of conference rooms for depositions in late August; correspond with Kevin Kneuper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:26PM - 6:38PM	Suzy Garcia 27.00 USD
07/16/2021	Prepare Deposition Notices for Kiet Lieu and Tuan Huynh, serve on all parties and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 6:48PM - 7:36PM	Suzy Garcia 108.00 USD
07/16/2021	Prepare Deposition Notices for Kiet Lieu and Tuan Huynh, serve on all parties and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 9:08PM - 9:44PM	Suzy Garcia 81.00 USD
07/25/2021	E-mail C. Queally regarding K. Lieu deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:09AM - 4:21AM	Kevin Kneupper 163.00 USD
07/25/2021	Research issues relating to objections to Konnektive discovery requests. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 4:21AM - 5:03AM	Kevin Kneupper 570.50 USD
07/27/2021	call w La Pura defendants counsel RE: settlement possibility, discuss same w K Kneupper after call La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:40PM - 6:10PM	Cyclone Covey 407.50 USD
07/27/2021	Conference with K. Kronenberger, J. Rosenfeld, and C. Covey regarding potential settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:31PM - 6:55PM	Kevin Kneupper 326.00 USD
07/27/2021	Conference with C. Covey regarding La Pura Defendants potential settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:55PM - 7:13PM	Kevin Kneupper 244.50 USD
07/27/2021	Review draft protective order and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 7:13PM - 8:19PM	Kevin Kneupper 896.50 USD
07/27/2021	Research good faith settlement issue and e-mail K. Kronenberger regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 10:55PM - 11:13PM	Kevin Kneupper 244.50 USD
07/28/2021	Prepare shell for Joint Motion for Protective Order and Protective Order. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 6:54PM - 8:00PM	Suzy Garcia 148.50 USD
07/28/2021	Edit draft of joint motion to approve protective order; e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 10:37PM - 10:55PM	Kevin Kneupper 244.50 USD
07/29/2021	Review RFP's for priority for meet and confer; e-mail opposing counsel regarding request to meet and confer on various issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:13PM - 10:37PM	Kevin Kneupper 326.00 USD
07/30/2021	Review protection order motion edits from Quick Box; edit order to add caption; e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:31PM - 11:49PM	Kevin Kneupper 244.50 USD
07/31/2021	Review documents and prepare document production set La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 11:41PM - 1:11AM ⁺¹	Cyclone Covey 1,222.50 USD

08/02/2021	Assemble documents for production, discuss methods for large file share w K Van Dyke La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 9:40AM - 10:34AM	Cyclone Covey 733.50 USD
08/02/2021	E-mail C. Queally regarding ESI issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 11:49PM - 12:19AM ⁺¹	Kevin Kneupper 407.50 USD
08/04/2021	E-mail C. Queally regarding protective order. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:34PM - 1:40PM	Kevin Kneupper 81.50 USD
08/04/2021	File Joint Motion for Protective Order; Email Hon. Huff and opposing counsel with copies of Joint Motion and Protective Order. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 4:15PM - 5:09PM	Suzy Garcia 121.50 USD
08/04/2021	Message S. Garcia regarding filing joint motion for protective order. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:28PM - 5:34PM	Kevin Kneupper 81.50 USD
08/05/2021	E-mail opposing counsel regarding time for meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:22PM - 8:34PM	Kevin Kneupper 163.00 USD
08/05/2021	Review Konnektive third party subpoenas. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:34PM - 8:52PM	Kevin Kneupper 244.50 USD
08/05/2021	E-mail C. Queally regarding third party subpoenas. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:52PM - 8:58PM	Kevin Kneupper 81.50 USD
08/05/2021	Draft omnibus meet and confer e-mail to Konnektive regarding RFP's. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 9:52PM - 11:34PM	Kevin Kneupper 1,385.50 USD
08/06/2021	Draft omnibus e-mail to Konnektive Defendants regarding RFP responses. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 3:34AM - 5:28AM	Kevin Kneupper 1,548.50 USD
08/08/2021	Draft omnibus e-mail to Konnektive Defendants regarding RFP responses. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 2:16AM - 3:34AM	Kevin Kneupper 1,059.50 USD
08/09/2021	Draft and send omnibus e-mail to Konnektive Defendants regarding RFP responses. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 5:40AM - 6:46AM	Kevin Kneupper 896.50 USD
08/09/2021	Review Konnektive's RFAs (Set One), RFP (Set One), calendar all deadlines and prepare shells for responses. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 6:46PM - 7:46PM	Suzy Garcia 135.00 USD
08/09/2021	Review Konnektive's RFAs (Set One), RFP (Set One), calendar all deadlines and prepare shells for responses. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 7:51PM - 9:15PM	Suzy Garcia 189.00 USD
08/10/2021	E-mail C. Queally regarding Konnektive issues for Wednesday meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:16AM - 12:40AM	Kevin Kneupper 326.00 USD

08/10/2021	E-mail K. Howatt regarding Quick Box issues for Wednesday meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:40AM - 12:58AM	Kevin Kneupper 244.50 USD
08/10/2021	E-mail K. Kronenberger regarding meet and confer on RFP's for La Pura Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:58AM - 1:04AM	Kevin Kneupper 81.50 USD
08/10/2021	Research proximate cause issues relating to Konnektive. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 1:04AM - 2:16AM	Kevin Kneupper 978.00 USD
08/10/2021	Send calendar entry for meet and confer to opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:40AM - 11:46AM	Kevin Kneupper 81.50 USD
08/11/2021	E-mail C. Queally regarding meet and confer on RFP's to Konnektive. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:03AM - 3:09AM	Kevin Kneupper 81.50 USD
08/11/2021	E-mail K. Kronenberger regarding settlement negotiations. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:09AM - 3:15AM	Kevin Kneupper 81.50 USD
08/11/2021	E-mail opposing counsel regarding time for call to clerk. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:15AM - 3:21AM	Kevin Kneupper 81.50 USD
08/12/2021	Prepare for and attend meet and confer; call clerk regarding discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 12:21AM - 2:03AM	Kevin Kneupper 1,385.50 USD
08/12/2021	Draft omnibus e-mail regarding Quick Box Defendants RFP objections. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 8:01PM - 10:19PM	Kevin Kneupper 1,874.50 USD
08/13/2021	Meet and confer with opposing counsel and conference with clerk regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 7:31PM - 8:01PM	Kevin Kneupper 407.50 USD
08/16/2021	Prepare shell for responses to Konnektive's RFP (Set One). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 12:14PM - 12:56PM	Suzy Garcia 94.50 USD
08/16/2021	Prepare shell for responses to Konnektive's RFP (Set One). La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 1:34PM - 3:10PM	Suzy Garcia 216.00 USD
08/16/2021	Conference with clerk and opposing counsel regarding outstanding discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 10:02PM - 11:08PM	Kevin Kneupper 896.50 USD
08/17/2021	Review Scheduling Order re Discovery and Pretrial Proceedings and calendar all related deadlines, and update case file re same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 5:02PM - 5:44PM	Suzy Garcia 94.50 USD
08/17/2021	Prepare Answers to Cross-Complaints filed by Defendants for attorney review and update case file with pleadings. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 6:52PM - 7:46PM	Suzy Garcia 121.50 USD
08/17/2021	Review La Pura's Objections and Responses to RFP (Set One) and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:58PM - 8:10PM	Suzy Garcia 27.00 USD

08/17/2021	Review emails regarding depositions of Kiet Liu and Tuan Huynh, correspond with Kevin Kneupper and Cyclone Covey regarding same, and update calendar accordingly. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:07PM - 8:19PM	Suzy Garcia 27.00 USD
08/18/2021	E-mail K. Howatt regarding joint motion to extend. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:25AM - 3:31AM	Kevin Kneupper 81.50 USD
08/18/2021	Conference with C. Covey and J. Faber regarding responses to Konnektive and Quick Box RFP's. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:38AM - 6:50AM	Kevin Kneupper 163.00 USD
08/18/2021	Conference w K Kneupper and J Faber RE: responding to Konnektive RFPs La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:57PM - 8:15PM	Cyclone Covey 244.50 USD
08/19/2021	Review Complaint and Konnektive RFPs La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 10:59AM - 11:53AM	Jarrett Faber 328.50 USD
08/19/2021	Draft Response to Konnektive RFPs La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 1:42PM - 2:54PM	Jarrett Faber 438.00 USD
08/19/2021	Draft Response to Konnektive RFPs La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 2:57PM - 4:33PM	Jarrett Faber 584.00 USD
08/20/2021	Draft Response to Konnektive RFPs La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 7:17AM - 9:23AM	Jarrett Faber 766.50 USD
08/20/2021	Draft e-mail to clerk summarizing discovery issues with Konnektive Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 7:37AM - 9:01AM	Kevin Kneupper 1,141.00 USD
08/20/2021	Draft Response to Konnektive RFPs La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 9:31AM - 10:31AM	Jarrett Faber 365.00 USD
08/20/2021	Review Quick Box RFPs La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 10:35AM - 11:47AM	Jarrett Faber 438.00 USD
08/20/2021	Draft Response to Quick Box RFPs La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 12:00PM - 12:48PM	Jarrett Faber 292.00 USD
08/20/2021	Review Subpoenas served by Konnektive, prepare for attorney review and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 3:38PM - 4:20PM	Suzy Garcia 94.50 USD
08/20/2021	Review Requests for Production of Documents and Interrogatories served by Quick Box and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:24PM - 4:48PM	Suzy Garcia 54.00 USD
08/20/2021	Review Order Granting Joint Motion for Protective Order and Joint Motion to Modify Scheduling Order, and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:47PM - 4:53PM	Suzy Garcia 13.50 USD
08/20/2021	Review Interrogatories and Amended RFAs served by Konnektive and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:53PM - 5:11PM	Suzy Garcia 40.50 USD

08/21/2021	Draft e-mail to clerk summarizing discovery issues with Konnektive Defendants; e-mail to opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:01AM - 9:31AM	Kevin Kneupper 407.50 USD
08/21/2021	Draft omnibus RFP e-mail to Quick Box. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:42 10:37AM - 3:19PM	Kevin Kneupper 3,830.50 USD
08/23/2021	Draft Letter to the Clerk Summarizing Discovery Dispute La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:28PM - 1:58PM	Jarrett Faber 182.50 USD
08/23/2021	Draft Letter to the Clerk Summarizing Discovery Dispute La Pura - Tan v Quickbox [LTAN-CA-200128]	2:12 2:03PM - 4:15PM	Jarrett Faber 803.00 USD
08/23/2021	Conference call with Jarrett Faber regarding Quick Box's responses to written discovery; update case file with responses served on 07/22/21. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:12PM - 2:36PM	Suzy Garcia 54.00 USD
08/23/2021	E-mail K. Howatt regarding call to clerk on RFP's; conference with K. Howatt; conference with clerk regarding extension. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 3:43PM - 4:19PM	Kevin Kneupper 489.00 USD
08/23/2021	Draft objections and responses to Konnektive Corporation RFP's; e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:42 5:43PM - 10:25PM	Kevin Kneupper 3,830.50 USD
08/24/2021	Review of Pleadings, Answers, Motions, and Judicial Opinions La Pura - Tan v Quickbox [LTAN-CA-200128]	3:12 11:03AM - 2:15PM	Jarrett Faber 1,168.00 USD
08/24/2021	E-mail C. Queally regarding draft e-mail to court on discovery disputes. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:55PM - 11:07PM	Kevin Kneupper 163.00 USD
08/25/2021	Draft Response to Quick Box RFPs La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 8:06AM - 9:06AM	Jarrett Faber 365.00 USD
08/25/2021	Review Order granting continuance of amended pleadings and update calendar. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:43PM - 3:55PM	Suzy Garcia 27.00 USD
08/25/2021	Review La Puras' Objections and Responses to Konnektive Corp's RFP (Set 1) and update file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:53PM - 4:11PM	Suzy Garcia 40.50 USD
08/26/2021	Draft Response to Quick Box RFPs La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 8:41AM - 10:35AM	Jarrett Faber 693.50 USD
08/26/2021	Review of Other Discovery Requests La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 11:12AM - 11:42AM	Jarrett Faber 182.50 USD
08/26/2021	Draft Response to Konnektive RFAs La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 11:59AM - 12:29PM	Jarrett Faber 182.50 USD
08/26/2021	Draft Response to Konnektive RFAs La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 2:06PM - 2:48PM	Jarrett Faber 255.50 USD

08/26/2021	Draft Response to Konnektive ROGs La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 2:51PM - 3:33PM	Jarrett Faber 255.50 USD
08/26/2021	Prepare shell for Responses to Quick Box LLC's RFP (Set 1). La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 3:22PM - 5:04PM	Suzy Garcia 229.50 USD
08/26/2021	Prepare shell for Responses to Quick Box LLC's RFP (Set 1). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:23PM - 6:35PM	Suzy Garcia 27.00 USD
08/27/2021	Draft Response to Konnektive ROGs La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 8:58AM - 9:58AM	Jarrett Faber 365.00 USD
08/27/2021	Draft Response to Quick Box ROGS La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 9:55AM - 12:01PM	Jarrett Faber 766.50 USD
08/27/2021	Prepare shell for Responses to Quick Box LLC's RFP (Set 1). La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 12:17PM - 2:05PM	Suzy Garcia 243.00 USD
08/27/2021	Draft Response to Konnektive RFAs La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 12:27PM - 1:27PM	Jarrett Faber 365.00 USD
08/27/2021	Edit Responses to Quick Book RFPs and Input Them Into Shell La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 3:09PM - 3:51PM	Jarrett Faber 255.50 USD
08/27/2021	Prepare shell for Responses to Konnektive's Amended Requests for Admission (Set 1) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 11:00PM - 11:54PM	Suzy Garcia 121.50 USD
08/27/2021	E-mail C. Queally regarding meet and confer on RFI's and dashboard RFP's. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:20PM - 11:32PM	Kevin Kneupper 163.00 USD
08/27/2021	E-mail clerk regarding discovery dispute extension request for Konnektive disputes. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:32PM - 11:38PM	Kevin Kneupper 81.50 USD
08/28/2021	Prepare shell for Responses to Konnektive's Interrogatories (Set 1) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:03AM - 2:21AM	Suzy Garcia 40.50 USD
08/28/2021	Prepare shell for Responses to Quick Box LLC's Interrogatories (Set 1) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:19AM - 2:37AM	Suzy Garcia 40.50 USD
08/28/2021	Draft e-mail to K. Kronenberger regarding settlement negotiations and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 11:50PM - 12:14AM ⁺¹	Kevin Kneupper 326.00 USD
08/30/2021	E-mail K. Kronenberger regarding settlement negotiations; research issues relating to settlement certification for e-mail; conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:14AM - 12:44AM	Kevin Kneupper 407.50 USD
08/30/2021	Edit Responses to Quick Book RFPs and Input Them Into Shell La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 7:13AM - 8:31AM	Jarrett Faber 474.50 USD

08/30/2021	Edit Responses to Konnektive RFPs and Input Them Into Shell La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 8:35AM - 9:29AM	Jarrett Faber 328.50 USD
08/30/2021	Edit Responses to Konnektive ROGs and Input Them Into Shell La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:31AM - 10:01AM	Jarrett Faber 182.50 USD
08/30/2021	Edit Responses to Quick Box ROGs and Input Them Into Shell La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:00AM - 10:24AM	Jarrett Faber 146.00 USD
08/30/2021	Edit Responses to Quick Box ROGs and Input Them Into Shell La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 10:39AM - 11:27AM	Jarrett Faber 292.00 USD
08/30/2021	Research RE Subpoena to Paysafe La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 1:21PM - 3:15PM	Jarrett Faber 693.50 USD
08/30/2021	Meet and confer with C. Queally regarding RFI's and dashboard RFP; call clerk. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:56PM - 3:14PM	Kevin Kneupper 244.50 USD
08/30/2021	Perform Konnektive Document Review La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:29PM - 3:59PM	Jarrett Faber 182.50 USD
08/30/2021	Create Trello cards regarding deadlines in Scheduling Order (Dkt. No. 177). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 11:34PM - 12:16AM ⁺¹	Suzy Garcia 94.50 USD
08/31/2021	Review email from Hon. Butcher regarding Konnektive's extension to meet and confer and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:25PM - 9:37PM	Suzy Garcia 27.00 USD
09/01/2021	Call with clerk and C. Queally regarding dashboard / RFI issue. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 3:32PM - 4:08PM	Kevin Kneupper 489.00 USD
09/02/2021	Zoom Call with C Covey and K Kneupper RE Complaint Letter La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:39PM - 1:51PM	Jarrett Faber 73.00 USD
09/03/2021	Draft letter brief on Konnektive dashboards / RFI issue. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 6:32PM - 9:14PM	Kevin Kneupper 2,200.50 USD
09/04/2021	Edit draft of responses to Konnektive Requests for Admission; message C. Covey regarding answers to confirm with client. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 9:14PM - 10:02PM	Kevin Kneupper 652.00 USD
09/04/2021	Edit draft of responses to Quick Box LLC interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 10:02PM - 12:08AM ⁺¹	Kevin Kneupper 1,711.50 USD
09/07/2021	Edit draft of responses to Quick Box LLC interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:08AM - 12:32AM	Kevin Kneupper 326.00 USD

09/07/2021	Edit draft of responses to Konnektive Corporation interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 12:32AM - 2:14AM	Kevin Kneupper 1,385.50 USD
09/07/2021	Message S. Garcia regarding discovery responses to Quick Box. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:46AM - 3:52AM	Kevin Kneupper 81.50 USD
09/07/2021	E-mail K. Kronenberger and J. Rosenfeld regarding meet and confer on RFP's to La Pura Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:52AM - 3:58AM	Kevin Kneupper 81.50 USD
09/07/2021	Call w client to discuss responses to written discovery propounded by Konnektive La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:25PM - 2:37PM	Cyclone Covey 163.00 USD
09/07/2021	Edit draft responses to Quick Box interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 9:52PM - 11:10PM	Kevin Kneupper 1,059.50 USD
09/07/2021	Prepare Subpoena to Paysafe Group Limited, serve on opposing counsel, calendar all related deadlines and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 10:21PM - 11:45PM	Suzy Garcia 189.00 USD
09/07/2021	Edit draft responses to Quick Box requests for production. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:36 11:10PM - 3:46AM ⁺¹	Kevin Kneupper 3,749.00 USD
09/08/2021	Review responses to Quick Box discovery; conference with S. Garcia regarding service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:56AM - 4:14AM	Kevin Kneupper 244.50 USD
09/08/2021	Prepare Plaintiff's Responses to Quick Box's Requests for Production and Interrogatories (Set 1) for service and serve. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 1:46PM - 3:28PM	Suzy Garcia 229.50 USD
09/09/2021	E-mail K. Kronenberger regarding meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:26AM - 12:32AM	Kevin Kneupper 81.50 USD
09/09/2021	Draft and file letter brief on dashboards and RFI's; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:36 8:44AM - 12:20PM	Kevin Kneupper 2,934.00 USD
09/10/2021	Message S. Garcia regarding exhibits to letter brief. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:44PM - 7:50PM	Kevin Kneupper 81.50 USD
09/11/2021	Draft e-mail to K. Howatt and research related issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:24 3:56PM - 7:20PM	Kevin Kneupper 2,771.00 USD
09/11/2021	E-mail clerk regarding exhibits to letter brief. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:38PM - 7:44PM	Kevin Kneupper 81.50 USD
09/12/2021	Edit responses to Konnektive RFA's. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:12PM - 10:24PM	Kevin Kneupper 163.00 USD
09/13/2021	Prepare Exhibits to Plaintiff's Letter Brief to be delivered to Hon. Butcher; conference calls with Kelly, clerk to Hon. Butcher, regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:36PM - 3:12PM	Suzy Garcia 81.00 USD

09/13/2021	Finalize and serve Plaintiff's Responses to Konnektive's Amended RFAs (Set One) and Interrogatories (Set One). La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 4:28PM - 5:46PM	Suzy Garcia 175.50 USD
09/14/2021	Review new PA case where Konnektive cited as CRM for CBD offers La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:09AM - 11:27AM	Cyclone Covey 244.50 USD
09/15/2021	Correspond with NWL regarding status of service of Subpoena to Paysafe; correspond with Kevin Kneupper regardign same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:23PM - 5:29PM	Suzy Garcia 13.50 USD
09/16/2021	Research Agent of Service of Paysafe Group; correspond with NWL regarding attempting service on Paysafe again; and telephone conference call with Kevin Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 2:55PM - 3:43PM	Suzy Garcia 108.00 USD
09/16/2021	Call w opposing counsel RE: meet and confer on production, discussion of settlement; post-call conference w K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 2:57PM - 3:45PM	Cyclone Covey 652.00 USD
09/17/2021	Prepare for meet and confer; meet and confer with K. Kronenberger and call court regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:25PM - 6:49PM	Kevin Kneupper 326.00 USD
09/17/2021	Call w client RE: discovery and general update La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:38PM - 7:50PM	Cyclone Covey 163.00 USD
09/19/2021	Call w K Kneupper on Konnektive DB and functions of github La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:40PM - 3:52PM	Cyclone Covey 163.00 USD
09/19/2021	Review Konnektive public github information, save same and message to K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:04PM - 4:16PM	Cyclone Covey 163.00 USD
09/20/2021	Conduct discovery call w court RE: access to Konnektive system, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:03PM - 2:39PM	Cyclone Covey 489.00 USD
09/20/2021	Review and calendar all related deadlines re Quick Box's RFPs (Set 1) to Rocket Management Group, correspondence from C. Queally regarding meet and confer, Orders regarding Discovery Conference and Status Conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 4:16PM - 5:04PM	Suzy Garcia 108.00 USD
09/21/2021	Review emails regarding document production and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:13PM - 9:19PM	Suzy Garcia 13.50 USD
09/22/2021	Review Minute Entry regarding Discovery Conference and emails re discovery, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:59PM - 10:11PM	Suzy Garcia 27.00 USD
09/22/2021	Correspond with NWL regarding status of service on Paysafe Group Limited and update Trello Card. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:07PM - 10:13PM	Suzy Garcia 13.50 USD

09/23/2021	Researching whether verification of interrogatories, both factual and legal contentions, must be made by the party in California. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 9:00AM - 11:00AM	Bara Ahmad 590.00 USD
09/24/2021	Researching potential other ways of serving a subpoena after several failed attempts of serving subpoena under California Civil Procedure Code La Pura - Tan v Quickbox [LTAN-CA-200128]	2:30 2:00PM - 4:30PM	Bara Ahmad 737.50 USD
09/27/2021	Prepare for meet and confer re: Konnektive RFP's; meet and confer with C. Queally. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 7:14AM - 8:32AM	Kevin Kneupper 1,059.50 USD
09/27/2021	Review Paysafe productions based on comments on meet and confer; conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:44AM - 9:08AM	Kevin Kneupper 326.00 USD
10/01/2021	Prepare for meet and confer; meet and confer with opposing counsel regarding discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 9:53PM - 10:47PM	Kevin Kneupper 733.50 USD
10/01/2021	Draft e-mail to clerk; circulate to opposing counsel; e-mail clerk regarding meet and confer results. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 10:47PM - 11:05PM	Kevin Kneupper 244.50 USD
10/05/2021	E-mail K. Kronenberger regarding financial documents production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:29AM - 5:35AM	Kevin Kneupper 81.50 USD
10/05/2021	E-mail K. Howatt regarding meet and confer on RFP's to Quick Box. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:35AM - 5:41AM	Kevin Kneupper 81.50 USD
10/06/2021	Review Konnektive document production; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:25PM - 4:37PM	Kevin Kneupper 163.00 USD
10/06/2021	Review National Merchants Association production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 4:43PM - 5:37PM	Kevin Kneupper 733.50 USD
10/06/2021	Review Konnektive's document production and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:28PM - 5:34PM	Suzy Garcia 13.50 USD
10/06/2021	Review notes on meet and confer and draft summary e-mail; e-mail C. Queally regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 5:37PM - 6:31PM	Kevin Kneupper 733.50 USD
10/10/2021	Draft amended 30(b)(1) notices for Lieu and Huynh; message S. Garcia regarding service.. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:57AM - 7:21AM	Kevin Kneupper 326.00 USD
10/10/2021	E-mail. K. Kronenberger regarding production of financial documents. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:21AM - 7:27AM	Kevin Kneupper 81.50 USD
10/10/2021	E-mail K. Kronenberger regarding Lieu and Huynh depositions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:27AM - 7:51AM	Kevin Kneupper 326.00 USD

10/11/2021	Prepare Amended Notices of Deposition of Tuan Huynh and Kiet Lieu, correspond with third party regarding court reporter reservation, calendar all related deadlines, and serve on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 12:13PM - 12:55PM	Suzy Garcia 94.50 USD
10/11/2021	Review status of pending Subpoenas. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 7:08PM - 7:44PM	Suzy Garcia 81.00 USD
10/11/2021	E-mail C. Queally regarding request to meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:34PM - 9:40PM	Kevin Kneupper 81.50 USD
10/12/2021	Conference with K. Gali regarding potential retention for contact with United States Attorneys' Office. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 6:46AM - 7:52AM	Kevin Kneupper 896.50 USD
10/12/2021	E-mail K. Gali regarding case background materials. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:52AM - 8:10AM	Kevin Kneupper 244.50 USD
10/12/2021	E-mail K. Kronenberger regarding request for call. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:10AM - 8:16AM	Kevin Kneupper 81.50 USD
10/12/2021	Research issues relating to compliance with automatic stay in settlement negotiations; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 8:16AM - 10:34AM	Kevin Kneupper 1,874.50 USD
10/12/2021	Review protective order regarding methods for clearing K. Gali; review produced documents for confidentiality designations. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 10:34AM - 11:04AM	Kevin Kneupper 407.50 USD
10/13/2021	E-mail K. Kronenberger regarding bankruptcy stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:54PM - 3:00PM	Kevin Kneupper 81.50 USD
10/13/2021	E-mail L. Tan regarding bankruptcy stay plans. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:06PM - 3:12PM	Kevin Kneupper 81.50 USD
10/13/2021	E-mail opposing counsel regarding stay relating to bankruptcy case. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:48PM - 3:54PM	Kevin Kneupper 81.50 USD
10/13/2021	Research bankruptcy sanctions issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 3:54PM - 6:00PM	Kevin Kneupper 1,711.50 USD
10/13/2021	Several telephone calls to Bankruptcy trustee and Bankruptcy Clerk's office regarding telephonic meeting of creditors. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 4:23PM - 4:59PM	Suzy Garcia 81.00 USD
10/19/2021	Research potential motion for sanctions in bankruptcy court. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 5:01AM - 7:43AM	Kevin Kneupper 2,200.50 USD
10/19/2021	Draft Motion to Stay and Proposed Order and Correspond with Kevin Kneupper regarding Same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 4:30PM - 5:12PM	Suzy Garcia
10/20/2021	Review local bankruptcy rules on appearance requirements; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:55AM - 8:13AM	Kevin Kneupper 244.50 USD

10/20/2021	Draft motion to stay; e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 8:13AM - 9:07AM	Kevin Kneupper 733.50 USD
10/20/2021	Research and draft motion for sanctions in bankruptcy court. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 9:07AM - 11:49AM	Kevin Kneupper 2,200.50 USD
10/20/2021	Read bankruptcy rules of procedure for appearance requirement in Central District. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 11:55AM - 12:19PM	Kevin Kneupper 326.00 USD
10/20/2021	Prepare Declaration of Kevin Kneupper ISO Unopposed Motion to Stay La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:53PM - 4:05PM	Suzy Garcia 27.00 USD
10/21/2021	E-mail S. Garcia regarding filing motion to stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:43PM - 12:49PM	Kevin Kneupper 81.50 USD
10/21/2021	Review NMA production; create comparison of potentially forged signatures. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 1:01PM - 3:07PM	Kevin Kneupper 1,711.50 USD
10/21/2021	File Unopposed Motion to Stay, lodge proposed order with Hon. Huff and email all parties regarding same; calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 5:13PM - 6:01PM	Suzy Garcia 108.00 USD
10/22/2021	Draft motion for sanctions in bankruptcy court. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 3:13PM - 5:49PM	Kevin Kneupper 2,119.00 USD
10/25/2021	Draft motion for sanctions in bankruptcy hearing. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 7:01PM - 9:19PM	Kevin Kneupper 1,874.50 USD
10/28/2021	Review K. Lieu's objections to Quick Box discovery requests. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:56AM - 1:08AM	Kevin Kneupper 163.00 USD
10/29/2021	Review order on motion to stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:56PM - 2:02PM	Kevin Kneupper 81.50 USD
11/01/2021	E-mail C. Queally regarding bankruptcy stay and document production from third party. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:03AM - 7:09AM	Kevin Kneupper 81.50 USD
11/08/2021	Draft sanctions motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 8:18PM - 9:54PM	Kevin Kneupper 1,304.00 USD
11/08/2021	Read bankruptcy rules of procedure for appearance requirement in Central District. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 9:54PM - 10:54PM	Kevin Kneupper 815.00 USD
11/09/2021	Research federal tax return issue under FRBP 4002; e-mail request to bankruptcy counsel for Total Health Supply TUA. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:54PM - 7:12PM	Kevin Kneupper 244.50 USD
11/09/2021	Read bankruptcy rules of procedure for appearance requirement in Central District. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 10:54PM - 11:48PM	Kevin Kneupper 733.50 USD

11/09/2021	Draft sanctions motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 11:48PM - 2:30AM ⁺¹	Kevin Kneupper 2,200.50 USD
11/13/2021	E-mail bankruptcy trustee regarding notice issues with petition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:32AM - 6:50AM	Kevin Kneupper 244.50 USD
11/13/2021	Draft sanctions motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:18 9:20AM - 1:38PM	Kevin Kneupper 3,504.50 USD
11/14/2021	Draft motion for sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 5:44PM - 8:02PM	Kevin Kneupper 1,874.50 USD
11/15/2021	Review FRBP and local rules. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 3:08PM - 4:14PM	Kevin Kneupper 896.50 USD
11/15/2021	Message S. Garcia regarding preparation of notice of appearance in bankruptcy proceeding and example documents. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:14PM - 4:32PM	Kevin Kneupper 244.50 USD
11/16/2021	Review local rules for Central District, prepare Bankruptcy proof of service Notice of Appearance and Motion for Sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 5:05PM - 7:05PM	Suzy Garcia 270.00 USD
11/16/2021	Conference with K. Naylor regarding Total Health Supply TUA bankruptcy filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:02PM - 8:26PM	Kevin Kneupper 326.00 USD
11/16/2021	Review local rules for Central District, prepare Bankruptcy proof of service Notice of Appearance and Motion for Sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 10:57PM - 1:03AM ⁺¹	Suzy Garcia 283.50 USD
11/16/2021	Draft motion for sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:12 11:02PM - 6:14AM ⁺¹	Kevin Kneupper 5,868.00 USD
11/17/2021	Prepare for 341 hearing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:59AM - 5:29AM	Kevin Kneupper 407.50 USD
11/17/2021	Review local rules for Central District, prepare Bankruptcy proof of service Notice of Appearance and Motion for Sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:18 7:31AM - 10:49AM	Suzy Garcia 445.50 USD
11/17/2021	Review local rules for Central District, prepare Bankruptcy proof of service Notice of Appearance and Motion for Sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 11:30AM - 12:00PM	Suzy Garcia 67.50 USD
11/17/2021	Review local rules for Central District, prepare Bankruptcy proof of service Notice of Appearance and Motion for Sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 11:58AM - 1:16PM	Suzy Garcia 175.50 USD
11/17/2021	Serve paper copies of Motion for Sanctions on all parties La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 2:28PM - 3:16PM	Suzy Garcia 108.00 USD

11/17/2021	Review final draft of motion for sanctions and exhibits; message S. Garcia regarding edits and filing of same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:50PM - 3:14PM	Kevin Kneupper 326.00 USD
11/17/2021	Attend 341 conference and wait for appearance of debtor. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 3:14PM - 4:44PM	Kevin Kneupper 1,222.50 USD
11/18/2021	Conference with K. Naylor. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:34AM - 11:40AM	Kevin Kneupper 81.50 USD
11/18/2021	Review local rules and chambers rules regarding notice of motion; message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 11:40AM - 12:22PM	Kevin Kneupper 570.50 USD
11/18/2021	Training for filing in Central District of CA Bankruptcy Court. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 6:27PM - 7:15PM	Suzy Garcia 108.00 USD
11/18/2021	Training for filing in Central District of CA Bankruptcy Court. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 7:11PM - 8:35PM	Suzy Garcia 189.00 USD
11/19/2021	Revise Notice of Hearing for BK case and correspond with Kevin Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 12:33PM - 2:27PM	Suzy Garcia 256.50 USD
11/19/2021	Several conference calls with the Bankruptcy clerks; draft notice of errata and prepare for filing and service; correspond with Kevin Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:30PM - 5:54PM	Suzy Garcia 54.00 USD
11/19/2021	Revise Notice of Hearing for BK case and correspond with Kevin Kneupper regarding same; serve Notice of Hearing, Notice of Errata and Supplemental Proof of service with copies of Motion for sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 6:54PM - 9:18PM	Suzy Garcia 324.00 USD
11/19/2021	Review draft notice of motion; message S. Garcia regarding edits. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:52PM - 8:10PM	Kevin Kneupper 244.50 USD
12/01/2021	Review response to motion for sanctions by Kronenberger Rosenfeld. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:43PM - 4:07PM	Kevin Kneupper 326.00 USD
12/01/2021	Conference with C. Covey regarding Kronenberger Rosenfeld response to motion for sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:07PM - 4:13PM	Kevin Kneupper 81.50 USD
12/02/2021	Review response to motion for sanctions by Total Health. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:13PM - 4:31PM	Kevin Kneupper 244.50 USD
12/02/2021	Draft motion and declaration for motion to lift automatic stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 10:01PM - 12:43AM ⁺¹	Kevin Kneupper 2,200.50 USD
12/03/2021	Review corporate filings for sanctions reply and collect potential exhibits. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:05AM - 1:59AM	Kevin Kneupper 733.50 USD

12/03/2021	Prepare Motion for Relief from the Automatic Stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 3:39PM - 5:39PM	Suzy Garcia 270.00 USD
12/03/2021	Prepare Motion for Relief from the Automatic Stay, file and serve. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:38PM - 6:02PM	Suzy Garcia 54.00 USD
12/03/2021	Draft declaration for motion to lift automatic stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 8:19PM - 10:01PM	Kevin Kneupper 1,385.50 USD
12/04/2021	Message S. Garcia regarding filing of motion to lift automatic stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:43AM - 12:49AM	Kevin Kneupper 81.50 USD
12/06/2021	Prepare Motion for Relief from the Automatic Stay, file and serve. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:03PM - 1:33PM	Suzy Garcia 67.50 USD
12/06/2021	Sign signature pages for motion to lift stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:58PM - 3:04PM	Kevin Kneupper 81.50 USD
12/06/2021	Message S. Garcia regarding requirements for filing motion to lift stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:04PM - 3:10PM	Kevin Kneupper 81.50 USD
12/06/2021	Prepare Motion for Relief from the Automatic Stay, file and serve. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 3:59PM - 4:59PM	Suzy Garcia 135.00 USD
12/06/2021	Prepare Motion for Relief from the Automatic Stay, file and serve. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 5:32PM - 6:56PM	Suzy Garcia 189.00 USD
12/07/2021	Prepare Notice of Errata in Bankruptcy case and correspond with Kevin Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:49PM - 2:19PM	Suzy Garcia 67.50 USD
12/07/2021	US Central District Bankruptcy Court training to get Kevin Kneupper registered to file electronically in this court. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:12PM - 4:24PM	Suzy Garcia 27.00 USD
12/07/2021	Draft reply on motion for sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:54 5:11PM - 1:05AM ⁺¹	Kevin Kneupper 6,438.50 USD
12/08/2021	Message S. Garcia regarding filing of sanctions reply. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:41AM - 4:59AM	Kevin Kneupper 244.50 USD
12/08/2021	Prepare Consolidated Motion for filing and service on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:12 12:10PM - 3:22PM	Suzy Garcia 432.00 USD
12/08/2021	Prepare Consolidated Motion for filing and service on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:45PM - 5:03PM	Suzy Garcia 40.50 USD
12/08/2021	Conference call with Bankruptcy Court regarding hearing and filings. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:18PM - 6:30PM	Suzy Garcia 27.00 USD

12/08/2021	Conference call with Bankruptcy Court regarding hearing and filings; correspond with Kevin Kneupper regardign same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:26PM - 6:38PM	Suzy Garcia 27.00 USD
12/09/2021	Edit draft of sanctions motion reply. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:59AM - 2:23AM	Kevin Kneupper 326.00 USD
12/09/2021	Prepare for 341 hearing and draft potential questions. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 2:23AM - 4:41AM	Kevin Kneupper 1,874.50 USD
12/12/2021	E-mail U.S. Trustree requesting recording of 341 meeting. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:11AM - 7:17AM	Kevin Kneupper 81.50 USD
12/14/2021	Prepare for sanctions motion hearing in bankruptcy. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 10:06AM - 11:42AM	Kevin Kneupper 1,304.00 USD
12/15/2021	Attend sanctions motion hearing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 11:42AM - 12:30PM	Kevin Kneupper 652.00 USD
12/16/2021	E-mail C. Queally regarding 341 meeting transcript. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:39PM - 6:45PM	Kevin Kneupper 81.50 USD
12/20/2021	Message S. Garcia regarding proposed order for motion for sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:43AM - 12:49AM	Kevin Kneupper 81.50 USD
12/20/2021	Correspond with Kevin Kneupper and prepare draft of proposed order granting Creditor's Motion for Sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 12:02PM - 12:50PM	Suzy Garcia 108.00 USD
12/20/2021	Edit proposed order on sanctions motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:31PM - 12:37PM	Kevin Kneupper 81.50 USD
12/20/2021	Message S. Garcia regarding lodging proposed order on sanctions motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:37PM - 12:43PM	Kevin Kneupper 81.50 USD
12/20/2021	Prepare forms to obtain copies of transcripts regarding 341 meeting and hearing on motion for sanctions; conference calls with bankruptcy clerk regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 1:56PM - 3:02PM	Suzy Garcia 148.50 USD
12/20/2021	USDC Central District of CA ECF training. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:30 3:48PM - 6:18PM	Suzy Garcia 337.50 USD
12/20/2021	Review local rules and prepare Notice of Lodging regarding proposed Order re BK case. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:36PM - 6:54PM	Suzy Garcia 40.50 USD
12/21/2021	Review local BK rules, prepare Notice of Lodgment regarding Proposed Order and correspond with Kevin Kneupper regarding same; review case docket and update case file with all pleadings [BK Case]. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 10:39AM - 12:27PM	Suzy Garcia 243.00 USD

12/21/2021	Review local BK rules, prepare Notice of Lodgment regarding Proposed Order and correspond with Kevin Kneupper regarding same; review case docket and update case file with all pleadings; correspond with NWL regarding filing of Notice of Lodgment and delivering copies of Transcript order forms to court. [BK Case]. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:13PM - 2:37PM	Suzy Garcia 54.00 USD
12/21/2021	Bankruptcy Training [BK CASE]. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:00 3:46PM - 6:46PM	Suzy Garcia 405.00 USD
12/22/2021	Bankruptcy Training [BK CASE]. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 12:33PM - 1:45PM	Suzy Garcia 162.00 USD
01/05/2022	Update file with all pleadings and revise calendar. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:54PM - 4:24PM	Suzy Garcia 67.50 USD
01/12/2022	Call w client RE: case update La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:48PM - 4:54PM	Cyclone Covey 81.50 USD
01/27/2022	Review Bankruptcy case docket, download all pleadings and draft Notice of Hearing; correspond with Kevin Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 1:57PM - 4:03PM	Suzy Garcia 283.50 USD
01/31/2022	Edit draft notice of continuance and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:33AM - 8:45AM	Kevin Kneupper 163.00 USD
02/01/2022	File notice of hearing in the Bankruptcy case; conference call with clerk regarding Kevin Kneupper's ECF registration to file in BK Court. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 1:06PM - 2:30PM	Suzy Garcia 189.00 USD
02/01/2022	File notice of hearing in the Bankruptcy case; conference call with clerk regarding Kevin Kneupper's ECF registration to file in BK Court; serve on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 9:10PM - 10:04PM	Suzy Garcia 121.50 USD
02/03/2022	Review case docket and hearing deadlines regarding hearing scheduled for March 2, 2022 and correspond with Cyclone Covey regardsame. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:43PM - 2:01PM	Suzy Garcia 40.50 USD
02/22/2022	Draft reply on motion to lift automatic stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 12:32AM - 1:14AM	Kevin Kneupper 570.50 USD
02/22/2022	File Reply in Bankruptcy Court. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:50PM - 9:08PM	Suzy Garcia 40.50 USD
02/22/2022	Review emails and download all conformed copiee [BK case]. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 11:51PM - 12:15AM ⁺¹	Suzy Garcia 54.00 USD
02/23/2022	Review and sign reply on motion to lift automatic stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:20AM - 1:26AM	Kevin Kneupper 81.50 USD
03/02/2022	Prepare for bankruptcy hearing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:05PM - 1:17PM	Kevin Kneupper 163.00 USD

03/02/2022	Attend bankruptcy hearing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:17PM - 1:23PM	Kevin Kneupper 81.50 USD
03/08/2022	Review potential document production for privilege. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 12:41AM - 2:59AM	Kevin Kneupper 1,874.50 USD
03/09/2022	Draft proposed order for motion to lift stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:05AM - 5:23AM	Kevin Kneupper 244.50 USD
03/09/2022	Review documents for production to Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:24 5:35AM - 8:59AM	Kevin Kneupper 2,771.00 USD
03/09/2022	Lodge Proposed Order Granting Motion to Lift Automatic Stay and serve on all parties to BK court. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 4:24PM - 5:24PM	Suzy Garcia 135.00 USD
03/09/2022	Prepare Form Order Granting Motion for Relief From the Automatic Stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:35PM - 7:59PM	Suzy Garcia 54.00 USD
03/09/2022	Prepare Form Order Granting Motion for Relief From the Automatic Stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:39PM - 9:03PM	Suzy Garcia 54.00 USD
03/09/2022	Prepare Form Order Granting Motion for Relief From the Automatic Stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:02PM - 9:20PM	Suzy Garcia 40.50 USD
03/11/2022	Draft notice of termination of bankruptcy stay and e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 7:26AM - 8:02AM	Kevin Kneupper 489.00 USD
03/14/2022	E-mail K. Kronenberger regarding draft notice regarding bankruptcy stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:14AM - 11:20AM	Kevin Kneupper 81.50 USD
03/14/2022	Review documents for privilege for document production. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 11:26AM - 1:02PM	Kevin Kneupper 1,304.00 USD
03/15/2022	Discovery production La Pura - Tan v Quickbox [LTAN-CA-200128]	2:12 11:07AM - 1:19PM	Cyclone Covey 1,793.00 USD
03/15/2022	Conference with C. Covey regarding document production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:50PM - 2:20PM	Kevin Kneupper 407.50 USD
03/16/2022	Edit draft notice and e-mail S. Garcia regarding filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:32PM - 4:38PM	Kevin Kneupper 81.50 USD
03/16/2022	File Notice of Termination of Bankruptcy Stay. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:31PM - 11:49PM	Suzy Garcia 40.50 USD
03/17/2022	Transfer document production files to synology. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:44PM - 5:50PM	Kevin Kneupper 81.50 USD

03/20/2022	Assemble documents for production La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 9:38PM - 10:44PM	Cyclone Covey 896.50 USD
03/22/2022	Draft amended deposition notice to Kiet Lieu. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:07AM - 9:19AM	Kevin Kneupper 163.00 USD
03/22/2022	Research deposition location issue for T. Martorano. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:19AM - 9:37AM	Kevin Kneupper 244.50 USD
03/22/2022	Draft notice of deposition to T. Martorano. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:37AM - 9:49AM	Kevin Kneupper 163.00 USD
03/23/2022	Continue assembling documents for production La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 6:33PM - 7:45PM	Cyclone Covey 978.00 USD
03/26/2022	Finalize first document production La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 11:57AM - 1:21PM	Cyclone Covey 1,141.00 USD
03/27/2022	Spot check document production and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:05PM - 2:23PM	Kevin Kneupper 244.50 USD
03/27/2022	Message opposing counsel regarding meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:23PM - 2:29PM	Kevin Kneupper 81.50 USD
03/28/2022	Meet and confer w counsel RE: withdrawal request La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 10:13AM - 10:31AM	Cyclone Covey 244.50 USD
03/28/2022	E-mail L. Tan regarding case. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:53PM - 4:59PM	Kevin Kneupper 81.50 USD
03/29/2022	Spot check document production and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 10:23PM - 10:41PM	Kevin Kneupper 244.50 USD
03/29/2022	E-mail opposing counsel regarding document production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:41PM - 10:47PM	Kevin Kneupper 81.50 USD
03/29/2022	E-mail C. Queally regarding payment processor productions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:47PM - 10:53PM	Kevin Kneupper 81.50 USD
03/30/2022	Edit draft deposition notice of T. Martorano. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:06PM - 4:12PM	Kevin Kneupper 81.50 USD
03/30/2022	Edit draft amended notice of K. Lieu. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:12PM - 4:18PM	Kevin Kneupper 81.50 USD
03/30/2022	Conference with C. Covey regarding call with K. Kronenberger. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:36PM - 4:42PM	Kevin Kneupper 81.50 USD
03/30/2022	Message S. Garcia regarding service of subpoenas. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:24PM - 6:30PM	Kevin Kneupper 81.50 USD

03/30/2022	Draft subpoena to D. Engel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 6:30PM - 7:24PM	Kevin Kneupper 733.50 USD
03/30/2022	Edit draft of joint discovery plan. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 7:24PM - 9:06PM	Kevin Kneupper 1,385.50 USD
03/30/2022	Conference w La Pura counsel RE: settlement, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:27PM - 7:51PM	Cyclone Covey 326.00 USD
03/30/2022	Review pleadings, update case file and calendar relevant dates. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:08PM - 8:26PM	Suzy Garcia 40.50 USD
03/30/2022	Prepare deposition notices regarding Tyler Martorano and Kiet Lieu; correspond with court reporting agency regarding reservation of videographer and court reporter. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 11:06PM - 12:42AM ⁺¹	Suzy Garcia 216.00 USD
03/31/2022	Correspond with court reporting agency regarding deposition of Tyler Martorano. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:13PM - 2:25PM	Suzy Garcia 27.00 USD
03/31/2022	Prepare Deposition Subpoena regarding David Engel and correspond with Kevin Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:09PM - 5:33PM	Suzy Garcia 54.00 USD
04/01/2022	Edit draft of joint discovery plan. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:12 1:18AM - 4:30AM	Kevin Kneupper 2,608.00 USD
04/01/2022	Draft and send e-mail to D. Engel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:24AM - 6:42AM	Kevin Kneupper 244.50 USD
04/01/2022	Review subpoena to D. Engel and message S. Garcia regarding service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:42AM - 6:54AM	Kevin Kneupper 163.00 USD
04/01/2022	E-mail C. Queally regarding inaccessible productions from Konnektive. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:54AM - 7:00AM	Kevin Kneupper 81.50 USD
04/02/2022	Draft deposition outline for T. Martorano. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 7:00AM - 9:36AM	Kevin Kneupper 2,119.00 USD
04/02/2022	Search for documents relating to D. Engel deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 9:36AM - 11:00AM	Kevin Kneupper 1,141.00 USD
04/04/2022	E-mail C. Queally requesting meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:42PM - 12:48PM	Kevin Kneupper 81.50 USD
04/04/2022	E-mail K. Howatt requesting meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:48PM - 12:54PM	Kevin Kneupper 81.50 USD
04/04/2022	Assemble second set of documents to produce, review documents, set up file share La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:44PM - 3:14PM	Cyclone Covey 407.50 USD

04/05/2022	Review and respond to email from QB/Konnektive counsel RE: settlement, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:16PM - 2:34PM	Cyclone Covey 244.50 USD
04/05/2022	Correspond with court reporter's office regarding deposition of La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:07PM - 4:25PM	Suzy Garcia 40.50 USD
04/05/2022	Correspond with court reporter's office regarding deposition of Kiet Lieu; Prepare Third Amended Notice of Deposition of Kiet Lieu and serve on all parties; update calendar regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 4:48PM - 5:36PM	Suzy Garcia 108.00 USD
04/05/2022	E-mail C. Queally regarding password access to production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:52PM - 6:58PM	Kevin Kneupper 81.50 USD
04/05/2022	Edit draft of joint discovery plan and message opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 6:58PM - 7:52PM	Kevin Kneupper 733.50 USD
04/07/2022	Correspond with court reporter in GA confirming deposition of Tyler Martorano. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:48PM - 1:06PM	Suzy Garcia 40.50 USD
04/08/2022	E-mail K. Kronenberger regarding request to delay Lieu deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:15PM - 3:27PM	Kevin Kneupper 163.00 USD
04/11/2022	E-mail C. Queally regarding T. Martorano deposition date. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:22PM - 7:46PM	Kevin Kneupper 326.00 USD
04/11/2022	E-mail K. Howatt regarding scheduling meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:46PM - 7:52PM	Kevin Kneupper 81.50 USD
04/13/2022	E-mail C. Queally regarding T. Martorano deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 9:13PM - 9:37PM	Kevin Kneupper 326.00 USD
04/13/2022	E-mail K. Howatt regarding meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:37PM - 9:43PM	Kevin Kneupper 81.50 USD
04/14/2022	Prepare Amended Notice of Deposition of Tyler Martorano. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:12PM - 8:24PM	Suzy Garcia 27.00 USD
04/14/2022	Prepare Amended Notice of Deposition of Tyler Martorano. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:25PM - 8:31PM	Suzy Garcia 13.50 USD
04/16/2022	Review deposition notice of T. Martorano and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:20AM - 6:26AM	Kevin Kneupper 81.50 USD
04/18/2022	Prepare Amended Notice of Deposition of Tyler Martorano. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 11:34AM - 12:04PM	Suzy Garcia 67.50 USD
04/18/2022	Correspond with Nationwide Legal regarding status of service re Deposition Subpoenas. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:40PM - 1:04PM	Suzy Garcia 54.00 USD

04/18/2022	Prepare Amended Notice of Deposition of Tyler Martorano. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:57PM - 2:33PM	Suzy Garcia 81.00 USD
04/18/2022	Correspond with third party vendors regarding depositions of Kiet Lieu and Tyler Martorano; serve Amended Deposition Notice of Tyler Martorano; calendar all relevant deadlines regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 3:09PM - 4:09PM	Suzy Garcia 135.00 USD
04/19/2022	E-mail opposing counsel re: Kiet Lieu deposition scheduling. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:50PM - 10:56PM	Kevin Kneupper 81.50 USD
04/19/2022	Conference with B. Kelley regarding Kiet Lieu deposition scheduling. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:56PM - 11:02PM	Kevin Kneupper 81.50 USD
04/19/2022	E-mail C. Queally regarding discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 11:02PM - 11:26PM	Kevin Kneupper 326.00 USD
04/19/2022	E-mail K. Howatt regarding meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:44PM - 11:56PM	Kevin Kneupper 163.00 USD
04/20/2022	E-mail K. Howatt regarding meet and confer and motion for sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:26AM - 3:50AM	Kevin Kneupper 326.00 USD
04/20/2022	Research ex parte filing rules. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:50AM - 4:08AM	Kevin Kneupper 244.50 USD
04/21/2022	Review court filings, update case file and calendar all relevant deadlines; update master proof of service per Notice of Appearance of R. Poteet. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 2:46PM - 3:28PM	Suzy Garcia 94.50 USD
04/21/2022	Prepare Defendants' document production for review (production served on 4-1-22). La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 3:23PM - 4:29PM	Suzy Garcia 148.50 USD
04/22/2022	E-mail regarding scheduling of K. Lieu deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:14AM - 4:20AM	Kevin Kneupper 81.50 USD
04/24/2022	E-mail C. Queally regarding request to meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:32AM - 6:38AM	Kevin Kneupper 81.50 USD
04/26/2022	E-mail C. Queally regarding zoom link for meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:56PM - 5:02PM	Kevin Kneupper 81.50 USD
04/26/2022	E-mail opposing counsel regarding K. Lieu deposition scheduling. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:26PM - 6:32PM	Kevin Kneupper 81.50 USD
04/26/2022	E-mail C. Queally regarding topics for meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:32PM - 6:44PM	Kevin Kneupper 163.00 USD
04/27/2022	E-mail C. Queally regarding meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:38PM - 7:50PM	Kevin Kneupper 163.00 USD

04/27/2022	Edit draft of D. Engel deposition outline. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 8:26PM - 9:08PM	Kevin Kneupper 570.50 USD
04/28/2022	Review Konnektive production and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:56AM - 4:26AM	Kevin Kneupper 407.50 USD
04/28/2022	Investigate Optimyzer (referenced in Konnektive production). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:26AM - 4:50AM	Kevin Kneupper 326.00 USD
04/29/2022	Conference with C. Queally and T. Dupuy regarding discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 5:50AM - 6:26AM	Kevin Kneupper 489.00 USD
04/29/2022	Prepare for and attend meet and confer with Quick Box. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 7:02AM - 9:44AM	Kevin Kneupper 2,200.50 USD
04/29/2022	Review Konnektive production, list items missing and deficiencies; send list of same to K Kneupper. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:38AM - 9:02AM	Cyclone Covey 326.00 USD
05/02/2022	Prepare for and conference with K. Howatt regarding Quick Box interrogatory issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 12:26PM - 1:14PM	Kevin Kneupper 652.00 USD
05/02/2022	Update Masters Proof of Service. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 2:51PM - 4:03PM	Suzy Garcia 162.00 USD
05/02/2022	Draft deposition outline for D. Engel deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:24 6:10PM - 9:34PM	Kevin Kneupper 2,771.00 USD
05/03/2022	E-mail counsel for K. Lieu regarding deposition date. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:22PM - 4:28PM	Kevin Kneupper 81.50 USD
05/03/2022	Conference with and e-mail M. Thomas regarding Engel deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:58PM - 6:10PM	Kevin Kneupper 163.00 USD
05/03/2022	Discuss QB employee turnover and potential settlement w K Kneupper; discuss deposition of D Engel w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:32PM - 6:38PM	Cyclone Covey 81.50 USD
05/03/2022	Draft deposition outline for D. Engel. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:18 10:46PM - 5:04AM ⁺¹	Kevin Kneupper 5,134.50 USD
05/04/2022	Prepare Third Amended Notice of Deposition of Kiet Lieu; correspond with court reporting agency regarding reservations. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 2:06PM - 3:12PM	Suzy Garcia 148.50 USD
05/04/2022	E-mail C. Queally regarding meet and confer summary. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:17PM - 4:35PM	Kevin Kneupper 244.50 USD
05/04/2022	E-mail T. Dupuy regarding meet and confer summary. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:35PM - 5:05PM	Kevin Kneupper 407.50 USD

05/04/2022	E-mail opposing counsel regarding D. Engel deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:05PM - 5:11PM	Kevin Kneupper 81.50 USD
05/04/2022	Update master proof of service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:55PM - 7:07PM	Suzy Garcia 27.00 USD
05/04/2022	Review K. Lieu amended deposition notice and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:17PM - 7:23PM	Kevin Kneupper 81.50 USD
05/04/2022	Draft deposition outline for D. Engel deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:42 7:23PM - 2:05AM ⁺¹	Kevin Kneupper 5,460.50 USD
05/04/2022	Update master proof of service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 10:01PM - 10:49PM	Suzy Garcia 108.00 USD
05/05/2022	Draft deposition outline for D. Engel deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:18 6:29AM - 11:47AM	Kevin Kneupper 4,319.50 USD
05/05/2022	Serve Notice of Deposition of Kiet Lieu. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:26PM - 2:38PM	Suzy Garcia 27.00 USD
05/05/2022	Email all counsel regarding AgileLaw and Zoom links for the deposition of David Engel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:44PM - 2:56PM	Suzy Garcia 27.00 USD
05/05/2022	Serve Notice of Deposition of Kiet Lieu. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 3:00PM - 4:00PM	Suzy Garcia 135.00 USD
05/06/2022	Update master proof of service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:07PM - 1:25PM	Suzy Garcia 40.50 USD
05/06/2022	Prepare exhibits. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:18PM - 3:24PM	Suzy Garcia 13.50 USD
05/06/2022	Review Engel production; attend Engel deposition and assist K Kneupper w questions and use of AgileLaw La Pura - Tan v Quickbox [LTAN-CA-200128]	4:30 4:00PM - 8:30PM	Cyclone Covey 3,667.50 USD
05/07/2022	Prepare for and take D. Engel deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:24 2:05AM - 6:29AM	Kevin Kneupper 3,586.00 USD
05/11/2022	E-mail L. Gesmer regarding La Pura product. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:48AM - 5:54AM	Kevin Kneupper 81.50 USD
05/11/2022	Review Quick Box production. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:30 10:06AM - 3:36PM	Kevin Kneupper 4,482.50 USD
05/11/2022	Review Konnektive production and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 3:36PM - 4:18PM	Kevin Kneupper 570.50 USD
05/12/2022	Review Quick Box production. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:00 7:06PM - 11:06PM	Kevin Kneupper 3,260.00 USD

05/13/2022	E-mail C. Queally regarding T. Martorano deposition start time. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:06PM - 6:12PM	Kevin Kneupper 81.50 USD
05/18/2022	Review Orders Setting Case Management Conference and Setting Briefing Schedule, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:00PM - 2:24PM	Suzy Garcia 54.00 USD
05/18/2022	Review Quick Box production. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:54 9:10PM - 2:04AM ⁺¹	Kevin Kneupper 3,993.50 USD
05/19/2022	Prepare for deposition of Tyler Martorano; correspond with K. Kneupper regardign same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:32PM - 3:44PM	Suzy Garcia 27.00 USD
05/20/2022	Prepare for T. Martorano deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	10:12 2:27AM - 12:39PM	Kevin Kneupper 8,313.00 USD
05/20/2022	Prepare for and take T. Martorano deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:42 5:45PM - 2:27AM ⁺¹	Kevin Kneupper 7,090.50 USD
05/23/2022	Detailed review of Quick Holdings Insurance Policies; take notes and discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 3:15PM - 4:09PM	Cyclone Covey 733.50 USD
05/23/2022	E-mail K. Howatt regarding Quick Box failure to produce Skype messages. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:39PM - 3:51PM	Kevin Kneupper 163.00 USD
05/23/2022	Review Quick Box production. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:54 4:51PM - 10:45PM	Kevin Kneupper 4,808.50 USD
05/24/2022	Conference with C. Covey regarding Konnektive automatic contract generator. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 4:03PM - 4:51PM	Kevin Kneupper 652.00 USD
05/24/2022	Work on database setup to import excel files of over 500,000 rows into a SQL system to allow for efficient queries of the data produced on the La Pura sales; troubleshoot errors thrown by massive excel file La Pura - Tan v Quickbox [LTAN-CA-200128]	4:36 8:14PM - 12:50AM ⁺¹	Cyclone Covey 3,749.00 USD
05/25/2022	Review Quick Box document production. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 12:21AM - 1:33AM	Kevin Kneupper 978.00 USD
05/25/2022	Draft settlement demand to Adele/Martell/Biggins and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:48 4:39AM - 7:27AM	Kevin Kneupper 2,282.00 USD
05/25/2022	Complete database setup. Run queries on database for 2020 transactions to determine sales, charging patterns, refunds, total volume of La Pura sales; discuss same with K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 5:32PM - 8:14PM	Cyclone Covey 2,200.50 USD
05/26/2022	Edit draft of joint discovery plan and e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 3:27AM - 4:21AM	Kevin Kneupper 733.50 USD

05/26/2022	Edit draft of settlement demand for Adele/Martell/Biggins and e-mail same to opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:21AM - 4:39AM	Kevin Kneupper 244.50 USD
05/26/2022	Review correspondence from opposing counsel regarding Defendants' document production; organize documents produced and update file. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 11:59AM - 12:59PM	Suzy Garcia 135.00 USD
05/26/2022	Send Exhibits of Deposition of Tyler Martorano to Court Reporter. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:43PM - 2:01PM	Suzy Garcia 40.50 USD
05/26/2022	Additional analysis on La Pura defendant database - find individuals with large numbers of transactions; update date and time on db to allow for efficient searching and queries; notes to K Kneupper RE: same; review email demand to Quick Books asking for their insurance policy and to settle the case with the individual QB defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	3:36 4:57PM - 8:33PM	Cyclone Covey 2,934.00 USD
05/27/2022	Edit joint discovery plan and e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:02AM - 6:32AM	Kevin Kneupper 407.50 USD
05/27/2022	Review Skype conversation production by Quick Box and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 6:32AM - 8:14AM	Kevin Kneupper 1,385.50 USD
05/27/2022	Draft e-mail to D. Wright regarding settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 8:14AM - 8:56AM	Kevin Kneupper 570.50 USD
05/27/2022	Correspond with Court Reporter in preparation for deposition of Kite Lieu. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:15PM - 2:39PM	Suzy Garcia 54.00 USD
05/27/2022	File Joint Discovery Plan. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 10:54PM - 11:24PM	Suzy Garcia 67.50 USD
05/28/2022	E-mail D. Wright regarding settlement offer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:56AM - 9:08AM	Kevin Kneupper 163.00 USD
05/28/2022	Prepare for K. Lieu deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:48 9:08AM - 11:56AM	Kevin Kneupper 2,282.00 USD
05/28/2022	E-mail D. Wright regarding Pike Street Capital. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:56AM - 12:02PM	Kevin Kneupper 81.50 USD
05/28/2022	E-mail K. Howatt regarding bank fraud by Quick Box and deficient production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:02PM - 12:20PM	Kevin Kneupper 244.50 USD
05/29/2022	Prepare for Kiet Lieu deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:54 12:20PM - 6:14PM	Kevin Kneupper 4,808.50 USD
05/31/2022	Prep exhibits for K Lieu deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 8:27AM - 9:21AM	Cyclone Covey 733.50 USD

05/31/2022	Prepare for and take K. Lieu deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:42 11:36AM - 8:18PM	Kevin Kneupper 7,090.50 USD
05/31/2022	Attend Kiet Lieu Deposition, assist K Kneupper w Agilelaw, exhibits, and follow up questions. Debrief after deposition w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	8:00 8:07PM - 4:07AM ⁺¹	Cyclone Covey 6,520.00 USD
06/01/2022	Prepare subpoena requests to Mastercard and cover letter to include, review proper place for service of subpoena, notes to S Garcia on finalizing the forms. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:26PM - 1:02PM	Cyclone Covey 489.00 USD
06/01/2022	Review Order Resetting Case Management Conference and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:25PM - 3:55PM	Suzy Garcia 67.50 USD
06/01/2022	Prepare Cover Letter and Subpoena to Mastercard for document production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 5:50PM - 6:44PM	Suzy Garcia 121.50 USD
06/01/2022	Edit draft of Mastercard subpoena and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:24PM - 10:48PM	Kevin Kneupper 326.00 USD
06/02/2022	Prepave cover letter to Mastercard and Subpoena for production of records. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 4:20PM - 5:32PM	Suzy Garcia 162.00 USD
06/03/2022	Correspond with process server in NY regarding service of Subpoena on Mastercard. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:52AM - 12:10PM	Suzy Garcia 40.50 USD
06/06/2022	Prepare shell for Contention Interrogatory to Konnektive Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:12PM - 8:24PM	Suzy Garcia 27.00 USD
06/07/2022	Draft e-mail to D. Wright and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:24AM - 6:48AM	Kevin Kneupper 326.00 USD
06/07/2022	Discussion w QB counsel RE: mediation and settlement possibilities, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 2:30PM - 3:12PM	Cyclone Covey 570.50 USD
06/07/2022	Review tax case law and send to QB counsel as follow up to conversation, draft response to their request for a demand and planning a mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:59PM - 3:17PM	Cyclone Covey 244.50 USD
06/07/2022	Revise proposed email to QB counsel RE: settlement and mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:15PM - 5:39PM	Cyclone Covey 326.00 USD
06/08/2022	E-mail C. Covey regarding e-mail from D. Wright and damages calculations. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:18AM - 10:24AM	Kevin Kneupper 81.50 USD
06/08/2022	Finalize and send email to QB counsel RE: mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:32AM - 10:44AM	Cyclone Covey 163.00 USD

06/08/2022	Edit draft second interrogatories to Konnektive Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:36AM - 11:54AM	Kevin Kneupper 244.50 USD
06/08/2022	Draft first amended responses to Quick Box interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 12:48PM - 2:42PM	Kevin Kneupper 1,548.50 USD
06/08/2022	Assemble documents for third production, redact files, finalize and produce documents La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 1:38PM - 2:26PM	Cyclone Covey 652.00 USD
06/08/2022	Email reply to QB counsel RE: mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:26PM - 2:32PM	Cyclone Covey 81.50 USD
06/09/2022	Serve Plaintiff's Second Set of Interrogatories to Konnektive Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 9:28AM - 9:52AM	Suzy Garcia
06/09/2022	Conference with QB counsel RE: settlement, discuss same with K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:37PM - 4:55PM	Cyclone Covey 244.50 USD
06/10/2022	Take video and photos of La Pura products La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:39PM - 12:51PM	Cyclone Covey 163.00 USD
06/10/2022	Take photos and videos of La Pura products, assemble files and produce electronically to opposing parties La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:37PM - 3:01PM	Cyclone Covey 326.00 USD
06/10/2022	Prepare for and attend CMC. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 6:12PM - 6:48PM	Kevin Kneupper 489.00 USD
06/10/2022	Edit draft interrogatory responses to Quick Box and e-mail C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 6:48PM - 8:00PM	Kevin Kneupper 978.00 USD
06/13/2022	Draft and send settlement offer to Konnektive counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:59PM - 2:11PM	Cyclone Covey 163.00 USD
06/13/2022	E-mail opposing counsel regarding signed protective order from L. Tan. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:54PM - 10:00PM	Kevin Kneupper 81.50 USD
06/14/2022	Review emails - create and add to privilege log La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 2:34PM - 4:28PM	Cyclone Covey 1,548.50 USD
06/14/2022	Review emails - create and add to privilege log La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:37PM - 6:07PM	Cyclone Covey 407.50 USD
06/15/2022	Review email from K Kroneberger RE: K Lieu, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:33PM - 1:51PM	Cyclone Covey 244.50 USD
06/15/2022	Calls w K Kronenberger RE: settlement of K Lieu La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:50PM - 3:20PM	Cyclone Covey 407.50 USD

06/16/2022	Queries to La Pura Database built from Konnetkive data to estimate number of individual shipments made in 2019 and 2020, report same to K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 9:29AM - 11:05AM	Cyclone Covey 1,304.00 USD
06/17/2022	Draft motion for default on La Pura entities and prepare for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 4:43PM - 5:49PM	Kevin Kneupper 896.50 USD
06/17/2022	Serve Dkt Nos 206 and 208 on all La Pura Defendants; file and serve Motion to enter Default against La Pura Defendants and serve. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:06 9:00PM - 2:06AM ⁺¹	Suzy Garcia 688.50 USD
06/19/2022	Serve Motion to enter Default against La Pura Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 1:08PM - 3:02PM	Suzy Garcia 256.50 USD
06/20/2022	Review files for additions needed for privilege log La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:02PM - 12:20PM	Cyclone Covey 244.50 USD
06/21/2022	Prepare Subpoena to Mastercard Incorporated to be served on CT Corporation; serve subpoena on opposing counsel and send out Subpoena and Cover Letter for personal service on Mastercard; several conference calls with Server in NY regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 6:01PM - 7:19PM	Suzy Garcia 175.50 USD
06/21/2022	Revise privilege log - remove confidential information, fix formatting, review for duplicates La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 8:41PM - 9:35PM	Cyclone Covey
06/27/2022	Draft supplemental responses to Quick Box interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 10:26PM - 12:50AM ⁺¹	Kevin Kneupper 1,956.00 USD
06/29/2022	Draft supplemental responses to Quick Box interrogatories; e-mail L. Tan regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 12:50AM - 3:32AM	Kevin Kneupper 2,200.50 USD
06/30/2022	Serve First Amended Responses to Quick Box, Inc.'s Interrogatories (Set 1) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:00PM - 5:18PM	Suzy Garcia 40.50 USD
07/01/2022	Discuss discovery dispute status w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:26PM - 2:38PM	Cyclone Covey 163.00 USD
07/05/2022	E-mail opposing counsel regarding meet and confer scheduling. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:02AM - 9:08AM	Kevin Kneupper 81.50 USD
07/05/2022	Review document production from Konnektive. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 9:14AM - 10:26AM	Kevin Kneupper 978.00 USD
07/06/2022	Draft privilege log. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:12 5:07PM - 8:19PM	Kevin Kneupper 2,608.00 USD
07/06/2022	Review correspondence regarding document productions and deposition transcripts, download all files and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 6:12PM - 7:12PM	Suzy Garcia 135.00 USD

07/06/2022	Conduct meet and confer with QB counsel and Konnektive Counsel, discuss settlement with opposing counsel, debrief after call w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 8:53PM - 10:41PM	Cyclone Covey 1,467.00 USD
07/06/2022	Attend meet and confer call and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 9:38PM - 11:08PM	Kevin Kneupper 1,222.50 USD
07/07/2022	Draft privilege log. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:54 4:32AM - 8:26AM	Kevin Kneupper 3,178.50 USD
07/07/2022	E-mail privilege log to opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:26AM - 8:32AM	Kevin Kneupper 81.50 USD
07/07/2022	Draft proposed e-mail to court regarding pending discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:31PM - 5:01PM	Kevin Kneupper 407.50 USD
07/07/2022	E-mail C. Queally regarding e-mail to court. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:01PM - 5:07PM	Kevin Kneupper 81.50 USD
07/08/2022	Edit draft of joint e-mail to court. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:32AM - 8:44AM	Kevin Kneupper 163.00 USD
07/08/2022	E-mail opposing counsel regarding joint e-mail to court and send same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:44AM - 8:50AM	Kevin Kneupper 81.50 USD
07/08/2022	Prepare for call with court. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 8:50AM - 9:32AM	Kevin Kneupper 570.50 USD
07/08/2022	Prepare for and attend hearing regarding discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 9:32AM - 11:38AM	Kevin Kneupper 1,711.50 USD
07/11/2022	E-mail C. Queally regarding request for extension. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:38AM - 11:44AM	Kevin Kneupper 81.50 USD
07/11/2022	E-mail C. Queally regarding logistics for K. Lieu deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:44AM - 11:50AM	Kevin Kneupper 81.50 USD
07/12/2022	Draft letter brief regarding discovery disputes (QB redaction issue). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:02PM - 1:56PM	Kevin Kneupper 733.50 USD
07/12/2022	Draft letter brief regarding discovery disputes (QB redaction issue). La Pura - Tan v Quickbox [LTAN-CA-200128]	2:54 3:32PM - 6:26PM	Kevin Kneupper 2,363.50 USD
07/13/2022	Review Quick Box's Notice of Deposition of Kiet Lieu and calendar all related events. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:35PM - 4:53PM	Suzy Garcia 40.50 USD
07/14/2022	Attend K. Lieu deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 6:50PM - 7:50PM	Kevin Kneupper 815.00 USD

07/15/2022	E-mail C. Queally regarding data export and access logs. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:48PM - 8:06PM	Kevin Kneupper 244.50 USD
07/18/2022	Draft letter brief regarding discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:24 3:22AM - 6:46AM	Kevin Kneupper 2,771.00 USD
07/19/2022	Draft letter brief on discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:12 2:46PM - 7:58PM	Kevin Kneupper 4,238.00 USD
07/20/2022	Draft letter brief on discovery issues and e-mail court regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:36 7:10AM - 2:46PM	Kevin Kneupper 6,194.00 USD
07/21/2022	Call w QB counsel RE: settlement, message to K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:54AM - 11:06AM	Cyclone Covey 163.00 USD
07/22/2022	Research issues relating to sanctions on Quick Box and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 8:10PM - 9:34PM	Kevin Kneupper 1,141.00 USD
07/25/2022	Review RFA's from Konnektive Defendants and e-mail C. Queally regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:18PM - 2:36PM	Kevin Kneupper 244.50 USD
07/26/2022	E-mail L. Tan regarding phone call from La Pura; conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:18PM - 4:36PM	Kevin Kneupper 244.50 USD
07/26/2022	Message S. Garcia regarding Mastercard subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:36PM - 4:42PM	Kevin Kneupper 81.50 USD
07/26/2022	Review Quick Box documents for confidentiality designation issues and e-mail K. Howatt regarding objections. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:18PM - 5:48PM	Kevin Kneupper 407.50 USD
07/26/2022	E-mail C T Corporation regarding Mastercard subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:48PM - 6:12PM	Kevin Kneupper 326.00 USD
07/27/2022	Email to client RE: harassing calls she's receiving to pay her LaPura "debt", call to number to try it out, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:39PM - 4:03PM	Cyclone Covey 326.00 USD
07/28/2022	Review correspondence from process server regarding corrected Affidavit re the Mastercard Subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:15AM - 12:27AM	Suzy Garcia 27.00 USD
07/28/2022	E-mail defendants regarding meet and confer on motion for protective order. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:54PM - 7:00PM	Kevin Kneupper 81.50 USD
07/29/2022	Draft response to Quick Box letter brief on interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:06 2:24AM - 5:30AM	Kevin Kneupper 2,526.50 USD
07/29/2022	Call w NC resident who is getting La Pura Debt collection calls La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:21PM - 4:39PM	Cyclone Covey 244.50 USD

07/29/2022	E-mail Mastercard regarding subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:48PM - 8:06PM	Kevin Kneupper 244.50 USD
07/29/2022	Draft response to Quick Box letter brief on interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:18 8:06PM - 2:24AM ⁺¹	Kevin Kneupper 5,134.50 USD
08/01/2022	Prepare materials for Mastercard and e-mail Mastercard counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 6:26PM - 8:02PM	Kevin Kneupper 1,304.00 USD
08/01/2022	E-mail C. Queally regarding D. Press deposition scheduling. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:56PM - 7:02PM	Kevin Kneupper 81.50 USD
08/02/2022	Meet and confer with opposing counsel on discovery disputes, follow up call w K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:27PM - 6:57PM	Cyclone Covey 407.50 USD
08/02/2022	Conference with C. Covey regarding meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:26PM - 7:38PM	Kevin Kneupper 163.00 USD
08/02/2022	Meet and confer regarding confidentiality designations and RFA's. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:38PM - 7:56PM	Kevin Kneupper 244.50 USD
08/03/2022	Prepare for call with Mastercard counsel and call same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 10:08PM - 11:02PM	Kevin Kneupper 733.50 USD
08/05/2022	E-mail court regarding availability for discovery hearing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:20AM - 1:26AM	Kevin Kneupper 81.50 USD
08/05/2022	Review Konnektive response briefing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:26AM - 1:50AM	Kevin Kneupper 326.00 USD
08/12/2022	Prepare for and attend discovery conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 7:24AM - 8:36AM	Kevin Kneupper 978.00 USD
08/12/2022	Review document production from Mastercard and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 8:36AM - 11:00AM	Kevin Kneupper 1,956.00 USD
08/12/2022	Discuss Mastercard response to subpoena w K Kneupper, effects on settlement negotiations, results of discovery conference La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:55PM - 6:19PM	Cyclone Covey 326.00 USD
08/12/2022	Draft request to archive.org to authenticate certain La Pura websites La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:19PM - 6:37PM	Cyclone Covey 244.50 USD
08/13/2022	Draft e-mail re: Mastercard document production and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:46PM - 2:16PM	Kevin Kneupper 407.50 USD
08/15/2022	Email client RE: deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:01PM - 3:07PM	Cyclone Covey 81.50 USD

08/15/2022	Create list of proposed subpoena targets and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:10PM - 4:34PM	Kevin Kneupper 326.00 USD
08/17/2022	E-mail C. Queally and K. Howatt regarding Press deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:06PM - 1:12PM	Kevin Kneupper 81.50 USD
08/19/2022	Draft eplanet.com subpoena, reseach eplanet.com corporate status, draft Sistrunk subpoena, leave VM for Mr. Sistrunk, Delvepoint search for Mr. Sistrunk, research Ice offers corporate form, draft Fully Accountable subpoena, research Fully accountable corporation status, La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 11:08AM - 12:14PM	Cyclone Covey 896.50 USD
08/21/2022	Draft response to Konnektive Corporation RFA's Set Two. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 1:29AM - 3:17AM	Kevin Kneupper 1,467.00 USD
08/21/2022	Draft response to M. Martorano RFA's. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 3:17AM - 4:11AM	Kevin Kneupper 733.50 USD
08/22/2022	Review draft subpoenas and message C. Covey regarding drafts and other potential targets. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 6:26AM - 7:02AM	Kevin Kneupper 489.00 USD
08/22/2022	E-mail counsel regarding D. Press deposition logistics. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:02AM - 7:08AM	Kevin Kneupper 81.50 USD
08/22/2022	Prepare for D. Press deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:18 7:26AM - 12:44PM	Kevin Kneupper 4,319.50 USD
08/22/2022	Call w J Sistrunk RE: deposition and subpoena La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:55PM - 3:07PM	Cyclone Covey 163.00 USD
08/22/2022	Research Geoff Clapp for subpoena - find address, online research La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:07PM - 3:31PM	Cyclone Covey 326.00 USD
08/23/2022	Review task list for subpoenas, research registered agents for Affiliati, Fully Accountable, update task list, add service addresses to subpoenas for individuals we seek to depose La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:06AM - 10:30AM	Cyclone Covey 326.00 USD
08/23/2022	Prepare Deposition Subpoenas for J. Sistrunk, C. Giorgio and G. Clapp. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 7:54PM - 8:30PM	Suzy Garcia 81.00 USD
08/23/2022	Prepare for D. Press deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:12 8:08PM - 2:20AM ⁺¹	Kevin Kneupper 5,053.00 USD
08/24/2022	Prepare for and attend D. Press deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:24 12:44PM - 8:08PM	Kevin Kneupper 6,031.00 USD
08/24/2022	Prepare Plaintiff's Responses to Matthew Martorano RFAs (Set 1) and Konnektive Corporation's RFAs (Set 2) and serve. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 3:10PM - 5:34PM	Suzy Garcia 324.00 USD

08/25/2022	Review G. Clapp subpoena and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:20AM - 2:26AM	Kevin Kneupper 81.50 USD
08/25/2022	Review RFA responses and message S. Garcia regarding service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:26AM - 2:32AM	Kevin Kneupper 81.50 USD
08/25/2022	Message C. Covey regarding interrogatory service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:02AM - 3:08AM	Kevin Kneupper 81.50 USD
08/25/2022	Edit VerticalOps subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:08AM - 3:20AM	Kevin Kneupper 163.00 USD
08/25/2022	Draft responses to S. Adele RFA's. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:32AM - 3:56AM	Kevin Kneupper 326.00 USD
08/25/2022	Send Deposition Subpoenas regarding Jeremy Sistrunk and Geoffrey Clapp for service; conference call with GA Process Server regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 12:14PM - 1:02PM	Suzy Garcia 108.00 USD
08/25/2022	Finalize Subpoena for Production of Documents to Christopher Giorgio and send out for service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 1:59PM - 2:41PM	Suzy Garcia 94.50 USD
08/25/2022	Finalize Subpoena for Production of Documents to Christopher Giorgio and send out for service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:00PM - 3:30PM	Suzy Garcia 67.50 USD
08/25/2022	Review written Defendants J. Martell, C. Biggins and S. Adele's Interrogatories to Plaintiff, and calendar all related deadlines; review Quick Box's RFAs to K. Lieu and Rocket Management, update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 3:29PM - 4:29PM	Suzy Garcia 135.00 USD
08/25/2022	Review Deposition Notice of Plaintiff and calendar all related deadlines; Review Orders, update case file and calendar all relevant deadlines; and update master pleadings regarding Order to Transfer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 4:26PM - 5:14PM	Suzy Garcia 108.00 USD
08/25/2022	Prepare Deposition Transcript of Kiet Lieu for attorney review. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:11PM - 5:23PM	Suzy Garcia 27.00 USD
08/25/2022	Correspond with Huseby Process Servers regarding location of production for Subpoena to Fully Accountable. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:21PM - 5:33PM	Suzy Garcia 27.00 USD
08/26/2022	Message S. Garcia regarding interrogatory service by Konnektive and QuickBox. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:50AM - 3:02AM	Kevin Kneupper 163.00 USD
08/26/2022	Review Fully Accountable subpoena and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:07PM - 4:13PM	Kevin Kneupper 81.50 USD
08/26/2022	Finalize and serve Plaintiff's Responses to Quick Box LLC and S. Adele's Requests for Admission (Set 1); correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 7:00PM - 9:00PM	Suzy Garcia 270.00 USD

08/29/2022	Review draft subpoena to Sling Ads LLC. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:31AM - 5:37AM	Kevin Kneupper 81.50 USD
08/29/2022	Look for evidence of Sling ads connection to defendants online, draft subpoena of documents for Sling Ads LLC La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 9:52AM - 10:40AM	Cyclone Covey 652.00 USD
08/29/2022	Draft subpoena of documents for Affiliati Network LLC La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:03PM - 3:15PM	Cyclone Covey 163.00 USD
08/30/2022	E-mail L. Tan regarding deposition preparation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:37AM - 5:43AM	Kevin Kneupper 81.50 USD
08/30/2022	Draft Second Amended Complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 6:19AM - 7:13AM	Kevin Kneupper 733.50 USD
08/30/2022	Conference call with process server regarding status of Subpoena to Fully Accountable LLC. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:54PM - 3:06PM	Suzy Garcia 27.00 USD
08/30/2022	Correspond with NWL regarding status of Deposition Subpoenas to Geoffrey Clapp and Jeremy Sistrunk; serve subpoenas on opposing counsel; set up court reporters regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 3:16PM - 4:10PM	Suzy Garcia 121.50 USD
08/30/2022	Serve Deposition Subpoenas to Geoffrey Clapp and Jeremy Sistrunk via regular US mail on opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:30PM - 5:54PM	Suzy Garcia 54.00 USD
08/30/2022	Prepare Subpoena for the Production of Documents to VerticalOps.com. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 6:01PM - 6:37PM	Suzy Garcia 81.00 USD
08/31/2022	Review final versions of Affiliati and VerticalOps subpoenas and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:07AM - 8:13AM	Kevin Kneupper 81.50 USD
08/31/2022	E-mail L. Tan regarding preparation for deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:13AM - 8:19AM	Kevin Kneupper 81.50 USD
08/31/2022	Finalize and Subpoena for the Production of Documents to VerticalOps.com on opposing counsel and witness. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 12:21PM - 1:27PM	Suzy Garcia 148.50 USD
08/31/2022	Prepare Document Subpoena to The Affiliati Network, LLC and serve on witness and opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:43PM - 2:07PM	Suzy Garcia 54.00 USD
08/31/2022	Prepare Document Subpoena to Sling Ads LLC and serve on witness and opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 2:57PM - 4:09PM	Suzy Garcia 162.00 USD
09/01/2022	Conference calls with several court reporters regarding deposition of Jeremy Sistrunk. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:15PM - 12:45PM	Suzy Garcia 67.50 USD

09/02/2022	Gather materials and research for deposition prep session of L. Tan. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 8:25AM - 10:49AM	Kevin Kneupper 1,956.00 USD
09/02/2022	Conference with LeAnne Tan regarding deposition preparation. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 10:49AM - 12:01PM	Kevin Kneupper 978.00 USD
09/06/2022	Travel to and from L. Tan deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:12 11:04PM - 1:16AM ⁺¹	Kevin Kneupper 1,793.00 USD
09/07/2022	Attend L. Tan deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:42 1:16AM - 8:58AM	Kevin Kneupper 6,275.50 USD
09/07/2022	Reply to opposing counsel email RE: remote deposition connection for Clapp and Sistrunk depositions La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:26PM - 12:32PM	Cyclone Covey 81.50 USD
09/07/2022	Follow up regarding service of Subpoenas to Fully Accountable LLC, Sling Ads, The Affiliati Network, LLC and Verticalops.com. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 3:51PM - 4:57PM	Suzy Garcia 148.50 USD
09/07/2022	Create DB queries to find transactions that were the same as client's 3 in the same day - clean up results and discuss same w K Kneupper - needed for prep on class certification motion La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 4:02PM - 6:20PM	Cyclone Covey 1,874.50 USD
09/07/2022	E-mail counsel for Fully Accountable re: subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:08PM - 4:14PM	Kevin Kneupper 81.50 USD
09/07/2022	Review Konnektive transaction data and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 5:08PM - 5:50PM	Kevin Kneupper 570.50 USD
09/07/2022	E-mail C. Queally regarding discovery issues and leave to amend. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 5:50PM - 7:26PM	Kevin Kneupper 1,304.00 USD
09/07/2022	Draft first amended initial disclosures and message S. Garcia regarding service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:26PM - 7:44PM	Kevin Kneupper 244.50 USD
09/08/2022	Serve Plaintiff's First Amended Initial Disclosures on all Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:02AM - 12:26AM	Suzy Garcia 54.00 USD
09/08/2022	Serve Plaintiff's First Amended Initial Disclosures on all Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:32PM - 4:50PM	Suzy Garcia 40.50 USD
09/08/2022	Correspond with GA Regus office regarding reservation of conference room for deposition of J. Sistrunk; correspond with court reporters regarding depositions scheduled for September 2022. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 4:32PM - 5:32PM	Suzy Garcia 135.00 USD
09/09/2022	Review Court Docket, and previous Orders regarding Status Conference scheduled for 9/16/22, revise calendar, and correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 2:53PM - 3:35PM	Suzy Garcia 94.50 USD

09/09/2022	Research alternate locations to serve document subpoenas on Affiliati and Sling Ads La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:01PM - 6:13PM	Cyclone Covey 163.00 USD
09/09/2022	E-mail Fully Accountable counsel regarding call scheduling. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:50PM - 9:56PM	Kevin Kneupper 81.50 USD
09/10/2022	Research text message retrieval options and e-mail L. Tan regarding search. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 8:23PM - 9:11PM	Kevin Kneupper 652.00 USD
09/12/2022	Revise Subpoenas to The Affiliati Network LLC and serve on all parties and witness. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 12:17PM - 12:59PM	Suzy Garcia 94.50 USD
09/12/2022	Revise Subpoenas to Sling ADS LLC and serve on all parties and witness. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:00PM - 1:30PM	Suzy Garcia 67.50 USD
09/12/2022	Prepare and produce Sistrunk witness interview La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:25PM - 4:31PM	Cyclone Covey 81.50 USD
09/12/2022	Review draft subpoenas and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:02PM - 7:14PM	Kevin Kneupper 163.00 USD
09/13/2022	Serve paper copies of Subpoenas to Sling ADS LLC and The Affiliati Network LLC on opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:45PM - 1:15PM	Suzy Garcia 67.50 USD
09/13/2022	Prepare for Sistrunk and Clapp Depositions La Pura - Tan v Quickbox [LTAN-CA-200128]	5:42 5:42PM - 11:24PM	Cyclone Covey 4,645.50 USD
09/13/2022	E-mail C. Queally regarding Sistrunk deposition time. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:39PM - 9:45PM	Kevin Kneupper 81.50 USD
09/14/2022	Attend Sistrunk deposition and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:30 3:17AM - 7:47AM	Kevin Kneupper 3,667.50 USD
09/14/2022	Finalize and serve Plaintiff's Second Requests for Production of Documents to Konnektive Defendants; calendar all r deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 5:25PM - 6:19PM	Suzy Garcia 121.50 USD
09/14/2022	Take Sistrunk deposition, follow up discussion w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	5:36 6:09PM - 11:45PM	Cyclone Covey 4,564.00 USD
09/14/2022	Prepare for Clapp deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 11:45PM - 2:27AM ⁺¹	Cyclone Covey 2,200.50 USD
09/15/2022	Prepare for and conduct Clapp deposition, follow up discussion w K Kneupper, discuss strategy for J Sistrunk deposition continuation, email court order to J Sistrunk, review emails between counsel scheduling conferences La Pura - Tan v Quickbox [LTAN-CA-200128]	6:54 2:45AM - 9:39AM	Cyclone Covey 5,623.50 USD

09/15/2022	Message C. Covey regarding witness lead. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:53AM - 7:59AM	Kevin Kneupper 81.50 USD
09/15/2022	E-mail Fully Accountable regarding subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:59AM - 8:05AM	Kevin Kneupper 81.50 USD
09/15/2022	Review Fully Accountable document production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:11AM - 8:29AM	Kevin Kneupper 244.50 USD
09/15/2022	Prepare for and attend G. Clapp deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:06 8:59AM - 2:05PM	Kevin Kneupper 4,156.50 USD
09/15/2022	Correspond with Chief Investigators regarding document production from Fully Accountable; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 11:47AM - 12:35PM	Suzy Garcia 108.00 USD
09/15/2022	Review Order Following Discovery Conference and calendar all relevant deadlines; prepare Prepare of Service regarding Jeremy Sistrunk; serve and file same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 1:49PM - 2:37PM	Suzy Garcia 108.00 USD
09/16/2022	Prepare Shells for Plaintiff's Responses to James Martell and Chad Biggins' Interrogatories (Sets 1). La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 11:22AM - 1:10PM	Suzy Garcia 243.00 USD
09/16/2022	Prepare shells for Motion to File Amended Complaint and Motion to Seal Documents. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 1:06PM - 2:36PM	Suzy Garcia 202.50 USD
09/16/2022	Correspond with parties regarding contact information for Court Reporters and Videographers who covered the Depositions of Jeremy Sistrunk and Geoffrey Clapp. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:40PM - 2:58PM	Suzy Garcia 40.50 USD
09/16/2022	Prepare shell for Plaintiff's Responses to Stephen Adele's Interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 3:45PM - 4:27PM	Suzy Garcia 94.50 USD
09/16/2022	Meet and confer with opposing counsel regarding leave to amend and discovery. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:08PM - 5:32PM	Kevin Kneupper 326.00 USD
09/16/2022	Draft form objection for interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 5:32PM - 6:08PM	Kevin Kneupper 489.00 USD
09/16/2022	Message S. Garcia regarding interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:08PM - 6:20PM	Kevin Kneupper 163.00 USD
09/16/2022	E-mail C. Queally regarding spoliation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:20PM - 6:44PM	Kevin Kneupper 326.00 USD
09/16/2022	Attend CMC. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:44PM - 7:02PM	Kevin Kneupper 244.50 USD
09/16/2022	Prepare shell for Plaintiff's Responses to Stephen Adele's Interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:45PM - 7:15PM	Suzy Garcia 67.50 USD

09/16/2022	Draft amended complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 7:02PM - 9:20PM	Kevin Kneupper 1,874.50 USD
09/16/2022	Correspond with NWL regarding service of the Subpoena for Document Production to The Affiliati Network, LLC; revise Subpoena and reserve on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 7:12PM - 7:48PM	Suzy Garcia 81.00 USD
09/16/2022	Serve Discovery responses on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:45PM - 8:03PM	Suzy Garcia 40.50 USD
09/19/2022	Draft amended complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 8:23AM - 9:05AM	Kevin Kneupper 570.50 USD
09/19/2022	Correspond with Husby Court Reporters and LitiCourt regarding Videos of all taken depositions up to date. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 4:22PM - 5:22PM	Suzy Garcia 135.00 USD
09/19/2022	Review Konnektives Interrogatories to Plaintiff (Set 2), update case file and calendar all relevant deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 5:22PM - 6:04PM	Suzy Garcia 94.50 USD
09/20/2022	E-mail C. Queally regarding spoliation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:35PM - 5:53PM	Kevin Kneupper 244.50 USD
09/21/2022	Review Minute Order regarding 9/16/22 Status Conference and calendar all relevant deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:50AM - 1:02AM	Suzy Garcia 27.00 USD
09/22/2022	E-mail C. Queally regarding Tan cell phone provider. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:43PM - 4:49PM	Kevin Kneupper 81.50 USD
09/23/2022	Review correspondences from third party vendors regarding deposition transcripts and videos, update case file regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 11:44AM - 1:02PM	Suzy Garcia 175.50 USD
09/23/2022	Correspond with NWL regarding reports of Diligence and Proof of Service regarding Subpoenas to Sling ADS LLC and The Affiliati; update case file regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:01PM - 1:31PM	Suzy Garcia 67.50 USD
09/23/2022	Prepare Subpoenas for Production of Documents to Sling ADS LLC; correspond with K. Kneupper regarding same; correspond with La Pura - Tan v Quickbox [LTAN-CA-200128]	2:54 1:42PM - 4:36PM	Suzy Garcia 391.50 USD
09/23/2022	Research issues relating to serving Sling Ads with subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 6:31PM - 7:43PM	Kevin Kneupper 978.00 USD
09/26/2022	Draft e-mail re: Sistrunk deposition and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:47AM - 2:11AM	Kevin Kneupper 326.00 USD
09/26/2022	E-mail C. Queally regarding Sistrunk deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:41AM - 3:47AM	Kevin Kneupper 81.50 USD

09/27/2022	Draft amended complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:30 9:05AM - 11:35AM	Kevin Kneupper 2,037.50 USD
09/29/2022	Draft amended complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 6:35AM - 8:23AM	Kevin Kneupper 1,467.00 USD
09/30/2022	Draft amended complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 5:23AM - 6:35AM	Kevin Kneupper 978.00 USD
10/03/2022	E-mail C. Queally regarding Sistrunk deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:59PM - 6:17PM	Kevin Kneupper 244.50 USD
10/04/2022	Correspond with court reporters regarding status of Deposition Transcripts for Mr. Clapp and Mr. Sistrunk. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 11:50AM - 12:14PM	Suzy Garcia 54.00 USD
10/04/2022	E-mail Affiliati counsel regarding requested extension. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:17PM - 6:23PM	Kevin Kneupper 81.50 USD
10/06/2022	Correspond with K. Kneupper and LitiCourt regarding Deposition Transcript of David Engel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:30PM - 4:42PM	Suzy Garcia 27.00 USD
10/07/2022	Correspond with third party vendor regarding document production from Vertical Ops. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:38PM - 12:50PM	Suzy Garcia 27.00 USD
10/07/2022	Meet and confer regarding motion for leave to amend and class certification motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 11:05PM - 11:35PM	Kevin Kneupper 407.50 USD
10/07/2022	Draft class certification motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 11:35PM - 1:23AM ⁺¹	Kevin Kneupper 1,467.00 USD
10/09/2022	Draft class certification motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:23AM - 2:17AM	Kevin Kneupper 733.50 USD
10/10/2022	Draft class certification motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:12 2:23AM - 5:35AM	Kevin Kneupper 2,608.00 USD
10/10/2022	Draft motion for class certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:54 6:05AM - 10:59AM	Kevin Kneupper 3,993.50 USD
10/10/2022	Correspond with LitiCourt regardign Transcript for Deposition of Kiet Lieu. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:13PM - 8:37PM	Suzy Garcia 54.00 USD
10/11/2022	Draft motion for class certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:54 11:17AM - 5:11PM	Kevin Kneupper 4,808.50 USD
10/11/2022	Prepare shells for Motion for Class Certification and Application to Seal Documents. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 12:15PM - 1:33PM	Suzy Garcia 175.50 USD

10/11/2022	Draft declaration explaining SQL analysis of Konnektive data for class certification motion La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 12:19PM - 1:37PM	Cyclone Covey 1,059.50 USD
10/11/2022	Draft declaration explaining SQL analysis of Konnektive data for class certification motion La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 1:46PM - 2:46PM	Cyclone Covey 815.00 USD
10/13/2022	Prepare shells for Motion for Leave to Amend the Complaint and Motion to file Under Seal. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 11:58AM - 12:22PM	Suzy Garcia 54.00 USD
10/13/2022	Prepare shells for Motion for Leave to Amend the Complaint and Motion to file Under Seal. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:07PM - 1:25PM	Suzy Garcia 40.50 USD
10/13/2022	Review case file and conference call with K. Kneupper regarding Motion for Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:39PM - 3:51PM	Suzy Garcia 27.00 USD
10/14/2022	Prepare Motion for Class Certification for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:12 2:57AM - 5:09AM	Suzy Garcia 297.00 USD
10/14/2022	Prepare Exhibits In Support of Motion for Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:18 11:38AM - 5:56PM	Suzy Garcia 850.50 USD
10/14/2022	Meet and confer w Quickbox counsel RE: interrogatory limit, discuss class cert motion w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:14PM - 4:26PM	Cyclone Covey 163.00 USD
10/14/2022	File Motion for Class Certification and Motion to Seal regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:24 7:43PM - 1:07AM ⁺¹	Suzy Garcia 729.00 USD
10/17/2022	Serve Lodged Exhibits in Support to Motion for Class Certification on all counsel and send courtesy copy to Hon. Lopez. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 1:39PM - 2:45PM	Suzy Garcia 148.50 USD
10/17/2022	Discuss strategy for court's upcoming discovery call w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:41PM - 5:59PM	Cyclone Covey 244.50 USD
10/18/2022	Correspond with NWL regarding Notice of Lodging Exhibits in support of K. Kneupper's Declaration re Motion for Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:00PM - 3:12PM	Suzy Garcia 27.00 USD
10/18/2022	Serve paper copies of Plaintiff's Responses to Konnektive Corporation's Interrogatories (Set 2). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:02PM - 5:32PM	Suzy Garcia 67.50 USD
10/18/2022	Prepare courtesy copies of Motion for Class Certification and all Exhibits and send via FedEx to Hon. Lopez. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 5:28PM - 6:04PM	Suzy Garcia 81.00 USD
10/18/2022	Prepare and file Notice of Motion for Class Certification Hearing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:06PM - 6:24PM	Suzy Garcia 40.50 USD

10/18/2022	Update Pleadings and calendar all relevant deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 10:33PM - 11:09PM	Suzy Garcia 81.00 USD
10/19/2022	Prepare for hearing with Court on interrogatory discovery issue - review briefs, case law, draft outline La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:02PM - 12:38PM	Cyclone Covey 489.00 USD
10/19/2022	Conduct discovery conference with court on QB expanded interrogatory requests, send notes of results to K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 4:47PM - 5:23PM	Cyclone Covey 489.00 USD
10/20/2022	Review correspondence regarding meet and confer regarding Discovery. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:14PM - 1:26PM	Suzy Garcia 27.00 USD
10/20/2022	Prepare Notice of Lodging Exhibits ISO Declaration of K. Kneupper ISO Plaintiff's Motion for Class Certification; conference call with Hon. Lopez's clerk regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 7:42PM - 8:36PM	Suzy Garcia 121.50 USD
10/21/2022	Review Notice of Lodging and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:06PM - 9:36PM	Suzy Garcia 67.50 USD
10/22/2022	Investigate VerticalOps contact information and e-mail VerticalOps regarding failure to respond to subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:30PM - 3:00PM	Kevin Kneupper 407.50 USD
10/22/2022	Draft subpoena to David Lee. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:00PM - 3:06PM	Kevin Kneupper 81.50 USD
10/22/2022	E-mail R. Poteet regarding dates and page limits for class certification motions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:06PM - 3:12PM	Kevin Kneupper 81.50 USD
10/22/2022	E-mail C. Queally regarding discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:12PM - 3:18PM	Kevin Kneupper 81.50 USD
10/23/2022	Draft motion for leave to amend complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:24 6:05AM - 10:29AM	Kevin Kneupper 3,586.00 USD
10/24/2022	Draft motion for leave to amend. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:30 12:47PM - 4:17PM	Kevin Kneupper 2,852.50 USD
10/24/2022	Prepare for Lavelle deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 4:17PM - 6:11PM	Kevin Kneupper 1,548.50 USD
10/25/2022	Draft motion for leave to amend. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 10:29AM - 12:47PM	Kevin Kneupper 1,874.50 USD
10/25/2022	Prep for deposition of S Levell w K Kneupper, work on AgileLaw setup for deposition exhibits La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 8:48PM - 9:30PM	Cyclone Covey 570.50 USD
10/26/2022	Serve Plaintiff's Second Amended Responses to Quick Box, LLC's Interrogatories (Set 1). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 1:30AM - 2:12AM	Suzy Garcia 94.50 USD

10/26/2022	Prepare for and attend Lavelle deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:00 6:44PM - 11:44PM	Kevin Kneupper 4,075.00 USD
10/27/2022	E-mail Paysafe counsel regarding S. Lavelle deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:44PM - 11:50PM	Kevin Kneupper 81.50 USD
10/27/2022	Edit draft of joint motion to extend page limits on class certification and e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:56PM - 12:08AM ⁺¹	Kevin Kneupper 163.00 USD
10/28/2022	E-mail C. Queally regarding meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:08AM - 12:14AM	Kevin Kneupper 81.50 USD
10/28/2022	E-mail Affiliati counsel regarding subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:31AM - 7:37AM	Kevin Kneupper 81.50 USD
10/28/2022	E-mail C. Queally regarding deposition of unknown person. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:37AM - 7:43AM	Kevin Kneupper 81.50 USD
10/28/2022	Conference call with Court Reporting Agency regarding copy of Deposition Transcript of Mr. Sistrunck. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:24PM - 12:36PM	Suzy Garcia 27.00 USD
10/28/2022	Conference call with Court Reporting Agency regarding copy of Deposition Transcript of Mr. Sistrunck; upload transcript. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 4:30PM - 5:12PM	Suzy Garcia 94.50 USD
10/29/2022	Draft motion for leave to amend. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 7:55AM - 8:49AM	Kevin Kneupper 733.50 USD
10/31/2022	Draft motion for leave to amend. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 9:31AM - 10:49AM	Kevin Kneupper 1,059.50 USD
10/31/2022	Correspond with Aallen Bryant & Associates regarding service of the Subpoena to Sling ADS LLC; prepare revised subpoena to Sling ADS LLC and send out for service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:34PM - 1:46PM	Suzy Garcia 27.00 USD
10/31/2022	Meet and confer w Konnektive counsel RE: number of ROGs and Sistrunck NDA; call w D Wright; discussion w K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:50PM - 3:08PM	Cyclone Covey 244.50 USD
11/01/2022	E-mail C. Queally regarding meet and confer summary. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:25AM - 9:31AM	Kevin Kneupper 81.50 USD
11/01/2022	Conference with Perkins attorneys regarding Quick Box. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:49AM - 11:13AM	Kevin Kneupper 326.00 USD
11/01/2022	Prepare Subpoenas to Sling ADS LLC and VerticalOps.com. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 11:43AM - 12:25PM	Suzy Garcia 94.50 USD
11/01/2022	Call w new QuickBox counsel RE: mediation, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:26PM - 3:44PM	Cyclone Covey 244.50 USD

11/01/2022	Prepare Subpoenas to Sling ADS LLC and VerticalOps.com. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:00PM - 5:30PM	Suzy Garcia 67.50 USD
11/01/2022	Collect settlement e-mails and send to Perkins. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:35PM - 6:05PM	Kevin Kneupper 407.50 USD
11/01/2022	Message S. Garcia regarding David Lee subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:05PM - 6:11PM	Kevin Kneupper 81.50 USD
11/01/2022	Prepare Subpoenas to Sling ADS LLC and VerticalOps.com. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:18PM - 9:30PM	Suzy Garcia 27.00 USD
11/02/2022	E-mail C. Queally regarding third party productions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:11PM - 6:17PM	Kevin Kneupper 81.50 USD
11/02/2022	Draft motion for leave to amend. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:18 6:17PM - 11:35PM	Kevin Kneupper 4,319.50 USD
11/03/2022	Review subpoena to myself, discuss w K Kneupper, review email correspondence RE: same, begin drafting motion to quash La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 9:15AM - 10:57AM	Cyclone Covey 1,385.50 USD
11/03/2022	Prepare Exhibits, Declaration and Motion for Leave to Amend First Amended Complaint; file same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 2:17PM - 4:35PM	Suzy Garcia 310.50 USD
11/03/2022	Prepare Exhibits, Declaration and Motion for Leave to Amend First Amended Complaint; file same. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:54 7:26PM - 11:20PM	Suzy Garcia 526.50 USD
11/03/2022	E-mail C. Queally regarding request to meet and confer on C. Covey deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:53PM - 12:05AM ⁺¹	Kevin Kneupper 163.00 USD
11/04/2022	Conference with C. Covey regarding subpoena to C. Covey. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:05AM - 12:29AM	Kevin Kneupper 326.00 USD
11/04/2022	Review filing versions of motion for leave to amend and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 1:23AM - 2:11AM	Kevin Kneupper 652.00 USD
11/04/2022	Prepare Exhibits, Declaration and Motion for Leave to Amend First Amended Complaint; file same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 2:01AM - 3:55AM	Suzy Garcia 256.50 USD
11/04/2022	Draft motion for leave to amend. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:48 2:11AM - 4:59AM	Kevin Kneupper 2,282.00 USD
11/04/2022	Call w D Wright RE: staying class certification, review email from Konnektive counsel RE: same, discuss same w K Kneupper, draft and send email response to request La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:34PM - 2:58PM	Cyclone Covey 326.00 USD
11/07/2022	Draft e-mail to C. Queally regarding meet and confer and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:23AM - 5:53AM	Kevin Kneupper 407.50 USD

11/07/2022	Edit e-mail re: meet and confer based on C. Covey changes and e-mail to opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:53AM - 6:05AM	Kevin Kneupper 163.00 USD
11/07/2022	Draft CLRA letter for new defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:29AM - 6:47AM	Kevin Kneupper 244.50 USD
11/07/2022	Review and edit draft motion to quash in Georgia and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:47AM - 7:17AM	Kevin Kneupper 407.50 USD
11/07/2022	Research relevant authority on motion to quash subpoenas seeking attorney testimony, draft motion and supporting brief, review local rules to ensure compliance with filing, draft motion to file motion to quash under seal because it contains protected information, discuss same with K Kneupper; review draft email to opposing counsel RE: same and provide edits to K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	5:36 8:09AM - 1:45PM	Cyclone Covey 4,564.00 USD
11/07/2022	Correspond with Integrity regarding courtesy copies to Hon. Lopes re Motion to Amend FAC; send courtesy copies to Hon. Lopez. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:20PM - 1:44PM	Suzy Garcia 54.00 USD
11/08/2022	Review motion to quash as to C. Covey for confidential information. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:17AM - 7:23AM	Kevin Kneupper 81.50 USD
11/08/2022	Review Affiliati production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:23AM - 7:47AM	Kevin Kneupper 326.00 USD
11/08/2022	Message S. Garcia regarding Affiliati production and producing to other parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:47AM - 7:53AM	Kevin Kneupper 81.50 USD
11/08/2022	E-mail Affiliati counsel regarding deficiencies in production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:53AM - 8:11AM	Kevin Kneupper 244.50 USD
11/08/2022	Meet and confer with opposing counsel regarding class certification stay and subpoenas to counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:23AM - 8:47AM	Kevin Kneupper 326.00 USD
11/08/2022	Draft responses to Konnektive interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 8:47AM - 9:53AM	Kevin Kneupper 896.50 USD
11/08/2022	Follow up with NWL regarding production of documents re The Affiliati Network Subpoena; correspond with K. Kneupper regarding same and prepare documents for production on opposing counsel; serve production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:45PM - 12:57PM	Suzy Garcia 27.00 USD
11/08/2022	Meet and confer w QB and Konnektive counsel RE: motion to stay class cert pending motion for leave to amend complaint, discuss subpoenas w opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:15PM - 1:39PM	Cyclone Covey 326.00 USD
11/08/2022	Conference call with C. Covey regarding filing of Motion to Quash. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:18PM - 1:42PM	Suzy Garcia 54.00 USD

11/09/2022	E-mail C. Queally regarding scheduling meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:34AM - 11:40AM	Kevin Kneupper 81.50 USD
11/09/2022	E-mail C. Queally regarding request for zoom call on crawler software. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:40AM - 11:58AM	Kevin Kneupper 244.50 USD
11/09/2022	Meet and confer with C. Queally regarding subpoenas to counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:58AM - 12:16PM	Kevin Kneupper 244.50 USD
11/09/2022	Draft neutral discovery dispute e-mail to Court. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:22PM - 12:40PM	Kevin Kneupper 244.50 USD
11/09/2022	Meet and confer w Konnektive counsel on subpoena for counsel depositions, review proposed email to Court on dispute La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:50PM - 7:08PM	Cyclone Covey 244.50 USD
11/09/2022	Prepare and serve document production regarding Subpoenaed documents received from The Affiliati Network, LLC. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 11:30PM - 12:12AM ⁺¹	Suzy Garcia 94.50 USD
11/10/2022	Prepare for and attend Trevelis deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:48 12:40PM - 4:28PM	Kevin Kneupper 3,097.00 USD
11/10/2022	Edit and send draft e-mail to chambers of Judge Leshner. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:46PM - 4:52PM	Kevin Kneupper 81.50 USD
11/11/2022	Review case Docket, download all recent pleadings, update case file and calendar all related deadlines; review Deposition exhibits for Shaun Lavelle and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 11:38AM - 12:44PM	Suzy Garcia 148.50 USD
11/11/2022	Review correspondence from third party vendor regarding status of service on Subpoenas to Sling ADS and Davin Lee; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 12:38PM - 1:20PM	Suzy Garcia 94.50 USD
11/11/2022	E-mail Affiliati counsel regarding scheduling call. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:07PM - 4:13PM	Kevin Kneupper 81.50 USD
11/13/2022	Draft opposition to motion to stay class certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:18 4:13PM - 8:31PM	Kevin Kneupper 3,504.50 USD
11/14/2022	Draft motion opposing stay request. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:42 3:13AM - 6:55AM	Kevin Kneupper 3,015.50 USD
11/15/2022	Draft declaration in support of opposition to Konnektive's ex-parte motion to stay class certification La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 9:27AM - 9:51AM	Cyclone Covey 326.00 USD
11/15/2022	Finalize and file Opposition to Defendants' Ex Parte Application to Stay Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 8:22PM - 9:40PM	Suzy Garcia 175.50 USD

11/15/2022	Draft motion opposing stay request. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:18 9:49PM - 3:07AM ⁺¹	Kevin Kneupper 4,319.50 USD
11/15/2022	Finalize and file Opposition to Defendants' Ex Parte Application to Stay Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 10:46PM - 11:04PM	Suzy Garcia 40.50 USD
11/17/2022	Conduct discovery call with court, follow up conference w K Kneupper, reply to Court's request for copies of subpoenas. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:55PM - 3:19PM	Cyclone Covey 326.00 USD
11/17/2022	Prepare for and attend discovery conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 11:44PM - 12:26AM ⁺¹	Kevin Kneupper 570.50 USD
11/18/2022	Revise motion to quash Cyclone Covey deposition (subpoena) to file with N Dist of GA La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 10:51AM - 11:21AM	Cyclone Covey 407.50 USD
11/21/2022	Draft letter brief on Sistrunk NDA. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:56AM - 1:32AM	Kevin Kneupper 489.00 USD
11/21/2022	Revise motion to quash to add facts concerning Leshner order and re-serving, add law on judicial economy, clean up brief, revise declaration and add exhibits. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 8:12AM - 9:06AM	Cyclone Covey 733.50 USD
11/21/2022	Review Order re Discovery Conference and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:25PM - 1:37PM	Suzy Garcia 27.00 USD
11/21/2022	Finalize Motion to Quash re Subpoena to C. Covey and file; review ND of GA Sealed Filing Procedures. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 7:04PM - 8:34PM	Suzy Garcia 202.50 USD
11/21/2022	Finalize Motion to Quash re Subpoena to C. Covey and file; review ND of GA Sealed Filing Procedures. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 11:07PM - 12:07AM ⁺¹	Suzy Garcia 135.00 USD
11/22/2022	E-mail C. Queally regarding meet and confer request. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:50AM - 1:56AM	Kevin Kneupper 81.50 USD
11/22/2022	Conference call with Docketing Clerk regarding Sealed portion to our MTQ; conference call with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 10:15AM - 10:45AM	Suzy Garcia 67.50 USD
11/22/2022	Discuss mediation prep and presentation w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:44PM - 3:14PM	Cyclone Covey 407.50 USD
11/22/2022	Serve Motion to Quash documents on opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:20PM - 5:32PM	Suzy Garcia 27.00 USD
11/23/2022	Conference with C. Covey regarding mediation presentation strategy. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:56AM - 2:26AM	Kevin Kneupper 407.50 USD
11/23/2022	Begin preparing presentation for mediation with Quickbox La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 4:42PM - 6:30PM	Cyclone Covey 1,467.00 USD

11/25/2022	Continue assembling mediation presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 11:08AM - 12:20PM	Cyclone Covey 978.00 USD
11/25/2022	Continue assembling mediation presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	3:36 2:11PM - 5:47PM	Cyclone Covey 2,934.00 USD
11/25/2022	Edit and file motion to compel production of confidentiality agreements. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:25PM - 8:49PM	Kevin Kneupper 326.00 USD
11/25/2022	Conference with C. Covey regarding presentation for mediation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:49PM - 9:07PM	Kevin Kneupper 244.50 USD
11/27/2022	Continue assembling mediation presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 9:42AM - 10:36AM	Cyclone Covey 733.50 USD
11/27/2022	Draft responses to Konnektive interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 9:07PM - 10:43PM	Kevin Kneupper 1,304.00 USD
11/28/2022	Continue assembling mediation presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	3:18 9:42AM - 1:00PM	Cyclone Covey 2,689.50 USD
11/28/2022	File Sealed Docs and Motion to Seal regarding Motion to Quash Covey Subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:31PM - 1:01PM	Suzy Garcia 67.50 USD
11/28/2022	File Sealed Docs and Motion to Seal regarding Motion to Quash Covey Subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:50PM - 2:20PM	Suzy Garcia 67.50 USD
11/28/2022	Continue assembling mediation presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	2:48 1:53PM - 4:41PM	Cyclone Covey 2,282.00 USD
11/28/2022	File Sealed Docs and Motion to Seal regarding Motion to Quash Covey Subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 3:15PM - 4:03PM	Suzy Garcia 108.00 USD
11/29/2022	E-mail C. Queally regarding request for meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:01AM - 12:13AM	Kevin Kneupper 163.00 USD
11/29/2022	Continue assembling mediation presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	3:00 11:51AM - 2:51PM	Cyclone Covey 2,445.00 USD
11/29/2022	Continue assembling mediation presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 4:13PM - 5:55PM	Cyclone Covey 1,385.50 USD
11/30/2022	Meet and confer with opposing counsel on sanctions motion, spoliation motion La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:31PM - 2:49PM	Cyclone Covey 244.50 USD
11/30/2022	Continue assembling mediation presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 2:39PM - 4:21PM	Cyclone Covey 1,385.50 USD

12/01/2022	Meet and confer regarding motions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:01AM - 2:19AM	Kevin Kneupper 244.50 USD
12/01/2022	Draft amended responses to Konnektive interrogatory set 2. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:24 2:55AM - 6:19AM	Kevin Kneupper 2,771.00 USD
12/01/2022	Draft reply on motion for leave to amend complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:42 9:49AM - 1:31PM	Kevin Kneupper 3,015.50 USD
12/01/2022	Email 2nd set of interrogatories to client for review and signature La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:06AM - 10:18AM	Cyclone Covey 163.00 USD
12/01/2022	Conference call with Clerk regarding Sealed Documents and filing of a Notice of Filing re Covey v. Konnektive Corp, et al (1:22-mi-00074); correspond with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 11:54AM - 12:30PM	Suzy Garcia 81.00 USD
12/01/2022	Review Motion to Compel Production, calendar all deadlines and update case file; review Docket, download all pleadings and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:17PM - 1:35PM	Suzy Garcia 40.50 USD
12/01/2022	Review background on La Pura w L Weekes and prep her for sanctions motion La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 1:26PM - 2:26PM	Cyclone Covey 815.00 USD
12/01/2022	E-mail L. Kalkstein regarding D. Lee subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:01PM - 2:07PM	Kevin Kneupper 81.50 USD
12/01/2022	Serve Plaintiff's First Amended Responses to Konnektive's Interrogatories (Set 2). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:28PM - 9:58PM	Suzy Garcia 67.50 USD
12/03/2022	Review video of presentation for mediation from C. Covey. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 7:37PM - 8:43PM	Kevin Kneupper 896.50 USD
12/04/2022	E-mail C. Covey suggestions on mediation presentation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:43PM - 8:49PM	Kevin Kneupper 81.50 USD
12/05/2022	Review court order on Sistrunk motion to compel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:51PM - 3:57PM	Kevin Kneupper 81.50 USD
12/05/2022	Conference with C. Covey regarding mediation presentation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:42PM - 7:06PM	Kevin Kneupper 326.00 USD
12/05/2022	Research prejudgment interest issues for mediation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:06PM - 7:24PM	Kevin Kneupper 244.50 USD
12/05/2022	Review draft outline for mediation brief and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:24PM - 7:36PM	Kevin Kneupper 163.00 USD
12/05/2022	Review Sistrunk agreement and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:36PM - 7:48PM	Kevin Kneupper 163.00 USD

12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 8:30AM - 9:00AM	Lorraine Weekes 222.50 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:02AM - 9:08AM	Lorraine Weekes 44.50 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 9:07AM - 9:43AM	Lorraine Weekes 267.00 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:03AM - 10:15AM	Lorraine Weekes 89.00 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:19AM - 10:25AM	Lorraine Weekes 44.50 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 10:23AM - 11:59AM	Lorraine Weekes 712.00 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:08PM - 12:20PM	Lorraine Weekes 89.00 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 12:34PM - 1:22PM	Lorraine Weekes 356.00 USD
12/06/2022	Call w Konnektive counsel RE: subpoenas to Plaintiff counsel, discuss same w K Kneupper, email to opposing counsel RE: same and withdrawing motion to quash La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:42PM - 1:54PM	Cyclone Covey 163.00 USD
12/06/2022	Draft withdrawal of motion to quash Cyclone subpoena La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:00PM - 2:18PM	Cyclone Covey 244.50 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:04PM - 3:34PM	Lorraine Weekes 222.50 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:34PM - 3:52PM	Lorraine Weekes 133.50 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:20PM - 4:38PM	Lorraine Weekes 133.50 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:40PM - 5:10PM	Lorraine Weekes 222.50 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:12PM - 5:42PM	Lorraine Weekes 222.50 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 6:48PM - 7:30PM	Lorraine Weekes 311.50 USD
12/06/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:40PM - 7:58PM	Lorraine Weekes 133.50 USD

12/06/2022	Edit draft of neutral e-mail on discovery disputes and e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:30PM - 8:54PM	Kevin Kneupper 326.00 USD
12/06/2022	Review withdrawal of motion to quash and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:30PM - 9:36PM	Kevin Kneupper 81.50 USD
12/07/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:51AM - 9:03AM	Lorraine Weekes 89.00 USD
12/07/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 9:08AM - 9:56AM	Lorraine Weekes 356.00 USD
12/07/2022	Begin drafting motion to compel Sistrunk compliance with subpoena, email to Mr. Sistrunk RE: voluntary compliance La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:47AM - 9:59AM	Cyclone Covey 163.00 USD
12/07/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:54AM - 10:06AM	Lorraine Weekes 89.00 USD
12/07/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:04PM - 5:16PM	Lorraine Weekes 89.00 USD
12/07/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:16PM - 8:28PM	Lorraine Weekes 89.00 USD
12/08/2022	Review draft e-mail to J. Sistrunk and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:24AM - 2:30AM	Kevin Kneupper 81.50 USD
12/08/2022	Review draft e-mail to court regarding sanctions motions and e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:42AM - 2:54AM	Kevin Kneupper 163.00 USD
12/08/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:15AM - 8:21AM	Lorraine Weekes 44.50 USD
12/08/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:21AM - 8:27AM	Lorraine Weekes 44.50 USD
12/08/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:29AM - 8:53AM	Lorraine Weekes 178.00 USD
12/08/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:34AM - 9:46AM	Lorraine Weekes 89.00 USD
12/08/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 9:46AM - 11:28AM	Lorraine Weekes 756.50 USD
12/08/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:28AM - 11:46AM	Lorraine Weekes 133.50 USD
12/08/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:47AM - 12:05PM	Lorraine Weekes 133.50 USD

12/08/2022	Conference call with E. Gerber; file and serve Withdrawal of Motion to Quash. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:24PM - 1:00PM	Suzy Garcia 81.00 USD
12/08/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:30PM - 12:42PM	Lorraine Weekes 89.00 USD
12/08/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:35PM - 6:47PM	Lorraine Weekes 89.00 USD
12/08/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 7:02PM - 7:50PM	Lorraine Weekes 356.00 USD
12/11/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 9:42AM - 10:36AM	Lorraine Weekes 400.50 USD
12/11/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 10:34AM - 11:04AM	Lorraine Weekes 222.50 USD
12/11/2022	Draft motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 11:07AM - 11:49AM	Lorraine Weekes 311.50 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 11:45AM - 12:27PM	Lorraine Weekes 311.50 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:28PM - 12:58PM	Lorraine Weekes 222.50 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 12:57PM - 1:57PM	Lorraine Weekes 445.00 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:00PM - 2:06PM	Lorraine Weekes 44.50 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 2:13PM - 3:43PM	Lorraine Weekes 667.50 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:51PM - 3:57PM	Lorraine Weekes 44.50 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:15PM - 4:39PM	Lorraine Weekes 178.00 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:40PM - 5:04PM	Lorraine Weekes 178.00 USD

12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 6:36PM - 8:00PM	Lorraine Weekes 623.00 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 8:02PM - 8:50PM	Lorraine Weekes 356.00 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 8:47PM - 9:35PM	Lorraine Weekes 356.00 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 10:02PM - 10:20PM	Lorraine Weekes 133.50 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 10:17PM - 10:47PM	Lorraine Weekes 222.50 USD
12/11/2022	Draft terminating sanctions motion; draft motion to seal; draft proposed orders; draft declaration of Kevin Kneupper ISO motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 10:42PM - 12:06AM ⁺¹	Lorraine Weekes 623.00 USD
12/12/2022	Draft terminating sanctions motion and motion to seal. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 12:07AM - 1:01AM	Lorraine Weekes 400.50 USD
12/12/2022	Review and proofread motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 8:07AM - 9:01AM	Lorraine Weekes 400.50 USD
12/12/2022	Motion to compel Sistrunk deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 12:08PM - 1:02PM	Cyclone Covey 733.50 USD
12/12/2022	Motion to compel Sistrunk deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:09PM - 3:39PM	Cyclone Covey 407.50 USD
12/12/2022	Continue assembling mediation presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 4:19PM - 5:13PM	Cyclone Covey 733.50 USD
12/12/2022	Call with QuickBooks counsel about upcoming mediation, conference with Kevin Kneupper concerning same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:14PM - 6:44PM	Cyclone Covey 407.50 USD
12/12/2022	Conference with C. Covey regarding mediation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:00PM - 9:30PM	Kevin Kneupper 407.50 USD
12/12/2022	Draft responses to Quick Box interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:18 10:24PM - 5:42AM ⁺¹	Kevin Kneupper 5,949.50 USD
12/13/2022	E-mail opposing counsel regarding request for extension to interrogatory responses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:12AM - 6:18AM	Kevin Kneupper 81.50 USD

12/13/2022	Motion to compel Sistrunk deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:27AM - 9:57AM	Cyclone Covey 407.50 USD
12/13/2022	Motion to compel Sistrunk deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 10:14AM - 10:32AM	Cyclone Covey 244.50 USD
12/13/2022	Motion to compel Sistrunk deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 10:35AM - 11:29AM	Cyclone Covey 733.50 USD
12/13/2022	Call and text with mediator about upcoming mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 11:28AM - 12:16PM	Cyclone Covey 652.00 USD
12/13/2022	Review documents for production (seventh production), create production log, bates number documents, send to opposing counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 6:09PM - 7:33PM	Cyclone Covey 1,141.00 USD
12/13/2022	Conference with mediator regarding mediation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:54PM - 10:24PM	Kevin Kneupper 407.50 USD
12/14/2022	Revise motion, fix typos, assemble exhibits for motion to compel to Mr. Sistrunk La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 8:44AM - 9:20AM	Cyclone Covey 489.00 USD
12/14/2022	Travel to LA for mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	6:30 3:30PM - 10:00PM	Cyclone Covey 5,297.50 USD
12/15/2022	Mediation with QuickBox La Pura - Tan v Quickbox [LTAN-CA-200128]	10:00 10:27AM - 8:27PM	Cyclone Covey 8,150.00 USD
12/15/2022	Attend mediation with Quick Box Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	10:06 12:50PM - 10:56PM	Kevin Kneupper 8,231.50 USD
12/16/2022	Travel for mediation. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 2:02AM - 4:20AM	Kevin Kneupper 1,874.50 USD
12/16/2022	Travel from LA mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	6:30 12:58PM - 7:28PM	Cyclone Covey 5,297.50 USD
12/19/2022	Draft e-mail to C. Queally regarding insurance coverage and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:50AM - 5:02AM	Kevin Kneupper 163.00 USD
12/19/2022	Draft responses to Adele interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:42 5:02AM - 11:44AM	Kevin Kneupper 5,460.50 USD
12/19/2022	Draft responses to Martell interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 11:44AM - 12:50PM	Kevin Kneupper 896.50 USD
12/20/2022	Draft responses to Martell interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 12:50PM - 3:32PM	Kevin Kneupper 2,200.50 USD
12/20/2022	Draft responses to Biggins interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 4:14PM - 6:02PM	Kevin Kneupper 1,467.00 USD

12/21/2022	Serve Plaintiffs' Amended Responses to J. Martell's Interrogatories (Set 1) and S. Adele's Interrogatories (Set 1). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:41PM - 4:11PM	Suzy Garcia 67.50 USD
12/23/2022	Emails, texts, and phone call with mediator RE: settlement offers to Quick Box La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 7:39PM - 8:09PM	Cyclone Covey 407.50 USD
12/23/2022	Conference with C. Covey regarding settlement discussions and e-mail Judge Papas regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 9:50PM - 10:26PM	Kevin Kneupper 489.00 USD
12/26/2022	Search for RMG employees with Skype for potential subpoenas and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 10:26PM - 10:56PM	Kevin Kneupper 407.50 USD
12/27/2022	Draft responses to C. Biggins interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 11:02PM - 11:56PM	Kevin Kneupper 733.50 USD
12/27/2022	Conference with C. Covey and Judge Papas. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:56PM - 12:02AM ⁺¹	Kevin Kneupper 81.50 USD
12/28/2022	Conference with C. Covey regarding mediation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:02AM - 12:20AM	Kevin Kneupper 244.50 USD
12/28/2022	Finalize motion to compel Sistrunk testimony, draft motion to file NDA under seal, assign filing to E Gerber La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:11PM - 12:41PM	Cyclone Covey 407.50 USD
12/28/2022	Serve C. Biggins interrogatory responses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:52PM - 1:58PM	Kevin Kneupper 81.50 USD
12/28/2022	Call customer of La Pura regarding potential backup class rep role. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:58PM - 2:10PM	Kevin Kneupper 163.00 USD
12/29/2022	Respond to meet and confer e-mail from C. Queally regarding contention interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 5:34PM - 6:28PM	Kevin Kneupper 733.50 USD
01/01/2023	E-mail opposing counsel regarding third party subpoenas. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:52PM - 7:04PM	Kevin Kneupper 163.00 USD
01/02/2023	E-mail C. Queally regarding meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:10PM - 7:16PM	Kevin Kneupper 81.50 USD
01/02/2023	Create estimate of Quick Box earnings and message C. Covey regarding calculations and news articles. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:16PM - 7:40PM	Kevin Kneupper 326.00 USD
01/03/2023	Meet and confer with Konnektive counsel on their objection to Plaintiff responses to defendant's contention interrogatories, discuss same with K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:52PM - 6:22PM	Cyclone Covey 407.50 USD
01/03/2023	Meet and confer with C. Queally and C. Covey regarding interrogatories. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 8:10PM - 8:40PM	Kevin Kneupper 407.50 USD

01/04/2023	Conference with potential backup class representative. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 8:46PM - 9:16PM	Kevin Kneupper 407.50 USD
01/05/2023	Review motion for sanctions on spoliation and Quick Box joinder. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:16PM - 9:46PM	Kevin Kneupper 407.50 USD
01/12/2023	Serve Biggins interrogatory responses via regular mail. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:59PM - 1:35PM	Suzy Garcia 81.00 USD
01/13/2023	Edit draft of motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 3:18AM - 5:54AM	Kevin Kneupper 2,119.00 USD
01/13/2023	Serve, via regular mail, Plaintiff's First Amended Responses to Chad Biggins' Interrogatories (Set One). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:09PM - 1:45PM	Suzy Garcia 81.00 USD
01/13/2023	Review case Docket, download and save all pleadings; review Order and serve J. Sistrunk with all initial pleadings (Tan v. Sistrunk). La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 8:03PM - 9:09PM	Suzy Garcia 148.50 USD
01/15/2023	Review case docket and attempt to lodge Provisionally Sealed Exhibit 4 (Tan v. Sistrunk). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:10PM - 9:28PM	Suzy Garcia 40.50 USD
01/15/2023	Correspond with Sprint Process Servers in GA regarding personal service of initial pleadings on J. Sistrunk (Tan v. Sistrunk). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 9:47PM - 10:11PM	Suzy Garcia 54.00 USD
01/16/2023	Prepare Notice of Filing of Exh. 4 Provisionally Under Seal and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 11:44AM - 12:20PM	Suzy Garcia 81.00 USD
01/17/2023	Draft response to spoliation sanctions motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:48 6:24AM - 10:12AM	Kevin Kneupper 3,097.00 USD
01/18/2023	Draft and file opposition to motion for spoliation sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	9:18 10:54AM - 8:12PM	Kevin Kneupper 7,579.50 USD
01/18/2023	Prepare Proposed Order and Motion for Leave to File Under Seal regarding Opposition to Motion for Evidentiary Sanctions for Spoliation of Evidence; prepare Opposition and Exhibits regarding same; file via ECF.. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:06 10:00PM - 3:06AM ⁺¹	Suzy Garcia 688.50 USD
01/19/2023	File Notice of Filing Exh 4 Under Seal; prepare Notice of Filing of Proof of Service via personal delivery on J. Sistrunk; and serve on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:43PM - 1:07PM	Suzy Garcia 54.00 USD
01/19/2023	File Notice of Filing Exh 4 Under Seal; prepare Notice of Filing of Proof of Service via personal delivery on J. Sistrunk; and serve on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:41PM - 1:59PM	Suzy Garcia 40.50 USD
01/20/2023	Several conference calls with Sprint Process Server regarding Affidavit and confirmation that Dkt Nos. 1-3 were personally served on Sistrunk. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 5:15PM - 5:51PM	Suzy Garcia 81.00 USD

01/23/2023	Prepare Amended Certificate of Service regarding Sistrunk, file and serve (Tan v. Sistrunk). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 11:48AM - 12:24PM	Suzy Garcia 81.00 USD
01/23/2023	Prepare Amended Certificate of Service regarding Sistrunk, file and serve (Tan v. Sistrunk). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:20PM - 2:50PM	Suzy Garcia 67.50 USD
01/26/2023	Prepare Notice of Lodging of Exhibit 2 to Plaintiff's Opposition to Defendant's Motion for Spoliation of Evidence. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:03PM - 4:27PM	Suzy Garcia 54.00 USD
01/26/2023	Prepare Notice of Lodging of Exhibit 2 to Plaintiff's Opposition to Defendant's Motion for Spoliation of Evidence, file with Court, and correspond NWL to ledge Exhibit2. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:40PM - 4:52PM	Suzy Garcia 27.00 USD
01/26/2023	Review email from J Sistrunk RE: subpoenaed testimony, discuss same w K Kneupper, respond to Mr. Sistrunk's email, email Konnektive counsel RE: Sistrunk NDA production La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:55PM - 5:13PM	Cyclone Covey 244.50 USD
01/27/2023	Email Konnektive counsel RE: Sistrunk deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:46PM - 3:52PM	Cyclone Covey 81.50 USD
01/31/2023	Edit draft of motion for terminating sanctions; message L. Weekes and S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:18 7:16AM - 12:34PM	Kevin Kneupper 4,319.50 USD
02/02/2023	Prepare Motion for Terminating Sanctions; file and serve Sealed Documents on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:23PM - 1:47PM	Suzy Garcia 54.00 USD
02/02/2023	Prepare Motion for Terminating Sanctions; file and serve Sealed Documents on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:54 2:11PM - 6:05PM	Suzy Garcia 526.50 USD
02/02/2023	Prepare Motion for Terminating Sanctions; file and serve Sealed Documents on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 8:00PM - 10:24PM	Suzy Garcia 324.00 USD
02/03/2023	Prepare Motion for Terminating Sanctions; file and serve Sealed Documents on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 12:56AM - 2:14AM	Suzy Garcia 175.50 USD
02/03/2023	Prepare conformed copies of Motion for Terminating Sanctions, Declaration and Exhibits and send courtesy copy to Hon. Lopez; calendar all related dates regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 1:32PM - 3:20PM	Suzy Garcia 243.00 USD
02/03/2023	Review order in Sistrunk matter, notes to K Kneupper RE: same, assign mail service on Sistrunk to E Gerber, email copies of orders to Konnektive counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:52PM - 6:10PM	Cyclone Covey 244.50 USD
02/06/2023	Draft response to order to show cause on Sistrunk NDA and why it should not be designated confidential La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:07PM - 4:31PM	Cyclone Covey 326.00 USD

02/09/2023	Sistrunk motion to compel: Finalize and file certificate of service of Court's order, finalize and file response to order to show cause, serve same on Konnektive counsel and Mr. Sistrunk La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:01PM - 4:19PM	Cyclone Covey 244.50 USD
02/09/2023	Review response to order to show cause and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:27PM - 8:33PM	Kevin Kneupper 81.50 USD
02/23/2023	Review opposition to motion for terminating sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:17PM - 5:41PM	Kevin Kneupper 326.00 USD
02/24/2023	Prepare and mail Letters to FL, PA, and AZ Attorney General. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 2:00PM - 2:48PM	Suzy Garcia 108.00 USD
02/24/2023	Review Quick Box's Opposition to Motion for Terminating Sanctions and update case file regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:17PM - 4:41PM	Suzy Garcia 54.00 USD
02/27/2023	Review QB response to motion for sanctions, review QB document production, send notes for documents and arguments to use in reply brief to K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 11:28AM - 1:04PM	Cyclone Covey 1,304.00 USD
03/02/2023	Review order on sealing of documents. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:23AM - 8:41AM	Kevin Kneupper 244.50 USD
03/02/2023	Draft and file reply on sanctions motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:24 9:23AM - 2:47PM	Kevin Kneupper 4,401.00 USD
03/02/2023	Prepare Reply to Opposition to Plaintiff's Motion for Terminating Sanctions; correspond with K. Kneupper; and file same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 3:02PM - 3:38PM	Suzy Garcia 81.00 USD
03/02/2023	Review Order on Plaintiff's Motions to Seal and file unsealed corresponding documents; prepare Dkt Nos. 259 and 265 for filing; correspond with K. Kneupper regarding same; and file Dkt Nos. 259 and 265. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 4:30PM - 6:36PM	Suzy Garcia 283.50 USD
03/02/2023	Review Order on Plaintiff's Motions to Seal and file unsealed corresponding Nos. 259 and 265 for filing; correspond with K. Kneupper regarding same; and file Dkt Nos. 259 and 265. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:11PM - 11:17PM	Suzy Garcia 13.50 USD
03/03/2023	Prepare Reply to Opposition to Plaintiff's Motion for Terminating Sanctions; correspond with K. Kneupper; and file same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:13AM - 2:07AM	Suzy Garcia 121.50 USD
03/06/2023	Prepare unsealed Motions and Exhibits for filing; file same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:05PM - 2:23PM	Suzy Garcia 40.50 USD
03/06/2023	Review sealed documents for filing publicly and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:07PM - 6:25PM	Kevin Kneupper 244.50 USD

03/06/2023	Message S. Garcia regarding document production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:25PM - 6:31PM	Kevin Kneupper 81.50 USD
03/06/2023	Prepare unsealed Motions and Exhibits for filing; file same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 11:31PM - 12:43AM ⁺¹	Suzy Garcia 162.00 USD
03/07/2023	Prepare correspondence to opposing counsel with production of documents received from D. Lee regarding VerticalOps Subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:42AM - 1:00AM	Suzy Garcia 40.50 USD
03/07/2023	Review Docket and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:09PM - 1:45PM	Suzy Garcia 81.00 USD
03/10/2023	Prepare documents produced by VerticalOps.com and update discovery file; correspond with NWL regarding production and provide them with a copy. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:15PM - 11:33PM	Suzy Garcia 40.50 USD
03/20/2023	E-mail R. Poteet regarding meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:11PM - 2:17PM	Kevin Kneupper 81.50 USD
03/20/2023	E-mail Affiliati attorney regarding document production in response to subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:05PM - 3:17PM	Kevin Kneupper 163.00 USD
03/22/2023	E-mail R. Poteet regarding meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:29PM - 3:35PM	Kevin Kneupper 81.50 USD
03/28/2023	E-mail Affiliati counsel regarding subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:01PM - 3:07PM	Kevin Kneupper 81.50 USD
03/30/2023	Meet and confer with opposing counsel and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:18PM - 3:36PM	Kevin Kneupper 244.50 USD
03/30/2023	Meet and confer with Quickbox and Konnektive counsel on status of depositions in case La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:25PM - 3:37PM	Cyclone Covey 163.00 USD
04/04/2023	Research class contact information issue and draft neutral e-mail to Court. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:42PM - 12:00AM ⁺¹	Kevin Kneupper 244.50 USD
04/11/2023	E-mail R. Poteet regarding discovery e-mail to chambers. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:46AM - 2:52AM	Kevin Kneupper 81.50 USD
04/11/2023	Review order granting motion to compel testimony in the Sistrunk matter, assign task to S Garcia to notice deposition, discuss dates w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:39PM - 4:45PM	Cyclone Covey 81.50 USD
04/13/2023	Prepare and serve Notice of Deposition of Jeremy Sistrunk; correspond with court reporter regarding reservations; calendar all related deadlines regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 12:23PM - 1:05PM	Suzy Garcia 94.50 USD

04/13/2023	Prepare and serve Notice of Deposition of Jeremy Sistrunk; correspond with court reporter regarding reservations; calendar all related deadlines regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 3:05PM - 3:47PM	Suzy Garcia 94.50 USD
04/13/2023	File Notice of Appearance of L. Weekes. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:54PM - 5:06PM	Suzy Garcia 27.00 USD
04/14/2023	E-mail Affiliati counsel regarding motion to compel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:27PM - 3:33PM	Kevin Kneupper 81.50 USD
04/14/2023	Re-serve Notice of Deposition of Jeremy Sistrunk on Quick Box Counsel; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 3:52PM - 4:52PM	Suzy Garcia 135.00 USD
04/14/2023	Draft subpoena to Microsoft. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 4:31PM - 5:13PM	Kevin Kneupper 570.50 USD
04/17/2023	Prepare Document Subpoena to Microsoft Corporation and send out Subpoena for Service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:12PM - 8:30PM	Suzy Garcia 40.50 USD
04/17/2023	Review and edit Microsoft subpoena and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:20PM - 8:38PM	Kevin Kneupper 244.50 USD
04/17/2023	Review Order regarding Discovery Conference and calendar all related deadlines; review case docket and update pleadings folder. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 11:07PM - 11:43PM	Suzy Garcia 81.00 USD
04/19/2023	Prefer for and attend status conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:49PM - 5:19PM	Kevin Kneupper 407.50 USD
04/19/2023	Correspond with process server regarding bad address for Microsoft Subpoena; correspond with K. Kneupper regarding mail service of Microsoft Subpoena and prepare Proof of Service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 6:05PM - 6:47PM	Suzy Garcia 94.50 USD
04/26/2023	Research whether it's proper to move to compel subpoenaed third parties who claim not to have documents that they actually have. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 10:00AM - 11:54AM	Austin Aguirre
04/26/2023	Correspond with USA Express regarding service of Microsoft Document Subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 1:13PM - 2:01PM	Suzy Garcia 108.00 USD
04/26/2023	Draft motion to compel production of class member contact information and message S. Garcia regarding filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:18 3:01PM - 8:19PM	Kevin Kneupper 4,319.50 USD
04/26/2023	Correspond with NWL regarding outstanding invoices on previously served Subpoenas; correspond with S. Shah regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:15PM - 3:33PM	Suzy Garcia 40.50 USD

04/26/2023	Prepare Motion to Compel Production of Class Member Contact Information, Declaration of K. Kneupper and Exhibits, and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 8:16PM - 9:22PM	Suzy Garcia 148.50 USD
05/08/2023	Prepare for resumed Sistrunk deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 10:21AM - 11:45AM	Cyclone Covey 1,141.00 USD
05/08/2023	Research whether it's proper to move to compel subpoenaed third parties who claim not to have documents that they actually have. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:36 8:04PM - 1:40AM ⁺¹	Austin Aguirre
05/09/2023	Research whether it's proper to move to compel subpoenaed third parties who claim not to have documents that they actually have. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 11:49AM - 12:31PM	Austin Aguirre
05/09/2023	Attend Sistrunk deposition virtually and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:00 2:57PM - 8:57PM	Kevin Kneupper 4,890.00 USD
05/09/2023	Conduct Sistrunk deposition part 2 including setup and breakdown of computer at deposition location, discuss results w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	6:00 4:25PM - 10:25PM	Cyclone Covey 4,890.00 USD
05/11/2023	Review pleadings, update file and calendar all relevant deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:40PM - 1:04PM	Suzy Garcia 54.00 USD
05/16/2023	Review opposition to motion to compel class list information. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:25PM - 5:49PM	Kevin Kneupper 326.00 USD
05/16/2023	Review and file Response to Defendants' Supplemental Evidence ISO their Opposition to Motion to Compel Class Member's Contact Information. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 9:11PM - 9:47PM	Suzy Garcia 81.00 USD
05/18/2023	Prepare for and attend discovery conference on class member list motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 11:35PM - 12:59AM ⁺¹	Kevin Kneupper 1,141.00 USD
05/23/2023	Review court orders on customer lists and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 12:27PM - 1:21PM	Kevin Kneupper 733.50 USD
05/23/2023	Review Orders regarding Discovery Conference and Motion to Compel Class Members Contact Information, update case file and calendar all deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 4:58PM - 5:46PM	Suzy Garcia 108.00 USD
05/24/2023	E-mail opposing counsel regarding meet and confer on discovery issues list. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:33PM - 2:39PM	Kevin Kneupper 81.50 USD
05/25/2023	E-mail C. Queally regarding Konnektive deletion of social media materials. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:03PM - 3:09PM	Kevin Kneupper 81.50 USD

05/25/2023	Draft subpoena to Jared Hall. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 3:09PM - 4:03PM	Kevin Kneupper 733.50 USD
05/25/2023	Draft subpoena to Justin Revia. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:03PM - 4:33PM	Kevin Kneupper 407.50 USD
05/26/2023	Review GA receivership law on possibility of appointing a receiver for Konnektive Corp. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 4:15PM - 5:09PM	Cyclone Covey 733.50 USD
05/26/2023	Prepare and serve Deposition Subpoenas to Jared Hall and Justin Revia; correspond with Court Reporters regarding reservations regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 7:30PM - 8:12PM	Suzy Garcia 94.50 USD
06/05/2023	Conference with C. Covey and S. Garcia regarding J. Hall subpoena and search for contact info on same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:19PM - 1:37PM	Kevin Kneupper 244.50 USD
06/05/2023	Draft spreadsheet of discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 1:37PM - 4:19PM	Kevin Kneupper 2,200.50 USD
06/05/2023	Correspond with abc Legal regarding service of Deposition Subpoena to Mr. Hall. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:40PM - 2:16PM	Suzy Garcia 81.00 USD
06/06/2023	E-mail C. Queally regarding settlement proposal. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:01AM - 4:07AM	Kevin Kneupper 81.50 USD
06/06/2023	Discussion w K Kneupper RE: process to call potential La Pura witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:01PM - 10:25PM	Cyclone Covey 326.00 USD
06/07/2023	Draft settlement proposal to Konnektive and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:49AM - 1:25AM	Kevin Kneupper 489.00 USD
06/07/2023	Review productions of class member contact information. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 1:25AM - 4:01AM	Kevin Kneupper 2,119.00 USD
06/07/2023	Call individuals from list of class members. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 4:25AM - 6:07AM	Kevin Kneupper 1,385.50 USD
06/07/2023	Conference with C. Covey and L. Weekes regarding class member contact project. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:07AM - 6:25AM	Kevin Kneupper 244.50 USD
06/07/2023	Import QB production of La Pura clients into SQL database, run SQL queries to find short list of customers to contact to find potential witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 8:53AM - 9:35AM	Cyclone Covey 570.50 USD
06/07/2023	Review order on terminating sanctions, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:39PM - 9:51PM	Cyclone Covey 163.00 USD

06/07/2023	Continue setting up system to call potential witnesses, discuss plan for calling witnesses with L Weekes and K Kneupper, set up call hotline for witnesses to contact firm La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 9:51PM - 10:39PM	Cyclone Covey 652.00 USD
06/08/2023	Prepare subpoena to J. Zuniga and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:25AM - 6:55AM	Kevin Kneupper 407.50 USD
06/08/2023	Draft email to send to prospective La Pura Witnesses, begin setup of system to send emails in bulk with different tests. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 12:08PM - 12:56PM	Cyclone Covey 652.00 USD
06/08/2023	Compile short list of La Pura customers to email, send first email to initial batch of 70, notes on what was done, discuss w L Weekes process of responding to people who contact us because of email, complete setup of phone hotline for La Pura victims La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 3:42PM - 4:18PM	Cyclone Covey 489.00 USD
06/08/2023	Call potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 4:00PM - 5:30PM	Lorraine Weekes 667.50 USD
06/09/2023	Send another batch of emails to potential La Pura witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:13AM - 9:31AM	Cyclone Covey 244.50 USD
06/09/2023	Prepare Document Subpoena to Janelle Zuniga and serve on all parties; correspond with NV process serving company regarding personal service on J. Zuniga. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 12:46PM - 2:04PM	Suzy Garcia 175.50 USD
06/09/2023	Calls to potential La Pura witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:06PM - 1:42PM	Cyclone Covey 489.00 USD
06/09/2023	Call potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:51PM - 3:27PM	Lorraine Weekes 267.00 USD
06/09/2023	Review Order Denying Plaintiff's Motion for Terminating Sanctions, update case file and calendar all related deadlines; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 2:57PM - 4:03PM	Suzy Garcia 148.50 USD
06/09/2023	Calls to potential La Pura witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:05PM - 3:35PM	Cyclone Covey 407.50 USD
06/09/2023	Call potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:57PM - 4:15PM	Lorraine Weekes 133.50 USD
06/09/2023	Prepare for deposition of Justin Reviea; correspond with Huseby Court Reporters regarding reservation of Court Reporter and Videographer; and update calendar regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:00PM - 4:24PM	Suzy Garcia 54.00 USD
06/09/2023	Call potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:44PM - 4:56PM	Lorraine Weekes 89.00 USD

06/09/2023	Correspond with Sprint Process Servers regarding service of Subpoena on Jared Hall; conference call to LexisNexis representative regarding charges/fees for a "people map" search; correspond with K. Kneupper regarding same and send out Subpoena again for second attempt to serve. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:18PM - 6:48PM	Suzy Garcia 67.50 USD
06/12/2023	Emails to prospective La Pura witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:38PM - 2:50PM	Cyclone Covey 163.00 USD
06/12/2023	Emails and calls to prospective La Pura witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:52PM - 3:04PM	Cyclone Covey 163.00 USD
06/12/2023	E-mail C. Queally regarding Konnektive Facebook page deletions and changes. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:07PM - 3:25PM	Kevin Kneupper 244.50 USD
06/12/2023	Respond to C. Queally e-mail regarding Facebook deletions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:25PM - 3:37PM	Kevin Kneupper 163.00 USD
06/12/2023	E-mail D. Wright regarding Adele deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:37PM - 3:43PM	Kevin Kneupper 81.50 USD
06/12/2023	Draft declaration for fee application. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:49PM - 11:01PM	Lorraine Weekes 89.00 USD
06/12/2023	Draft declaration for fee application. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:58PM - 11:10PM	Lorraine Weekes 89.00 USD
06/12/2023	Draft declaration for fee application. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:44PM - 11:50PM	Lorraine Weekes 44.50 USD
06/12/2023	Draft declaration for fee application. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:45PM - 11:57PM	Lorraine Weekes 89.00 USD
06/13/2023	Emails and calls to prospective La Pura witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:19PM - 12:55PM	Cyclone Covey 489.00 USD
06/13/2023	Call potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:48PM - 3:12PM	Lorraine Weekes 178.00 USD
06/13/2023	Call potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:01PM - 7:13PM	Lorraine Weekes 89.00 USD
06/13/2023	Call potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 7:11PM - 7:53PM	Lorraine Weekes 311.50 USD
06/14/2023	Respond to email from potential witness. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 9:26AM - 9:50AM	Lorraine Weekes 178.00 USD
06/14/2023	Call La Pura potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:57PM - 1:33PM	Lorraine Weekes 267.00 USD
06/14/2023	Call La Pura potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:29PM - 1:59PM	Lorraine Weekes 222.50 USD

06/14/2023	Call w Perkins Coie RE: resuming settlement discussions w QB La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:52PM - 2:16PM	Cyclone Covey 326.00 USD
06/14/2023	Call La Pura potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:55PM - 2:25PM	Lorraine Weekes 222.50 USD
06/14/2023	Call La Pura potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:28PM - 2:34PM	Lorraine Weekes 44.50 USD
06/14/2023	Draft statement of expenses and prepare declarations for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 2:47PM - 4:41PM	Kevin Kneupper 1,548.50 USD
06/14/2023	Call La Pura potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:06PM - 3:24PM	Lorraine Weekes 133.50 USD
06/14/2023	Prepare and file Plaintiff's Statement of Expenses Pursuant to Dkt. No. 298. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 5:39PM - 6:33PM	Suzy Garcia 121.50 USD
06/14/2023	Review Notice of Withdrawal of T. Dupuy, Order Regarding Plaintiff's Motion for Leave to Amend First Amended Complaint, and Order Regarding Briefing Schedule Regarding Motion for Class Certification; update case file; and calendar all related deadlines regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 11:23PM - 12:11AM ⁺¹	Suzy Garcia 108.00 USD
06/15/2023	Respond to email from potential witness. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:42AM - 9:48AM	Lorraine Weekes 44.50 USD
06/15/2023	Conference call with SprinProcess Servers regarding status of service of Deposition Subpoena on Jared Hall; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:28PM - 12:40PM	Suzy Garcia 27.00 USD
06/15/2023	Conference call with LV Investigations regarding status of service of Deposition Subpoena to Janelle Zuniga. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:37PM - 12:49PM	Suzy Garcia 27.00 USD
06/15/2023	Draft follow up email to QB's counsel (Perkins) RE: continuing settlement discussions La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:45PM - 2:03PM	Cyclone Covey 244.50 USD
06/15/2023	Finalize draft of spreadsheet of disputed discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 11:30PM - 12:48AM ⁺¹	Kevin Kneupper 1,059.50 USD
06/16/2023	E-mail opposing counsel regarding disputed discovery issues list and meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:48AM - 1:00AM	Kevin Kneupper 163.00 USD
06/16/2023	Call potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:11PM - 12:23PM	Lorraine Weekes 89.00 USD
06/16/2023	Call potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:14PM - 1:20PM	Lorraine Weekes 44.50 USD

06/16/2023	Call potential witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:27PM - 1:51PM	Lorraine Weekes 178.00 USD
06/16/2023	Review Order regarding Response to Plaintiff's Statement of Expenses and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:36PM - 3:48PM	Suzy Garcia 27.00 USD
06/16/2023	Research potential identifying information to locate Jared Hall and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:37PM - 10:07PM	Kevin Kneupper 407.50 USD
06/19/2023	Call potential La Pura witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:24PM - 12:48PM	Lorraine Weekes 178.00 USD
06/19/2023	Call Diana Hernandez. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:01PM - 2:07PM	Lorraine Weekes 44.50 USD
06/19/2023	Call Diana Hernandez. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:04PM - 2:10PM	Lorraine Weekes 44.50 USD
06/20/2023	Review Facebook ad requirements and data requirements to create custom audience from La Pura customer data La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:00PM - 2:24PM	Cyclone Covey 326.00 USD
06/20/2023	Review Skip Trace report from Sprint Process Servers regarding Jared Hall; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:50PM - 5:14PM	Suzy Garcia 54.00 USD
06/21/2023	Queries to QB customer data to create database of emails to use for FB ads to find La Pura victims, create landing page for people who respond to ads, connect same to slack for notifications, message to K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:06PM - 2:00PM	Cyclone Covey 733.50 USD
06/21/2023	Email potential witness. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:36PM - 1:48PM	Lorraine Weekes 89.00 USD
06/21/2023	Speak with La Pura victim. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:08PM - 2:14PM	Lorraine Weekes 44.50 USD
06/21/2023	Correspond with LitiCourt regarding deposition of Defendant S. Adele and update calendar regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:10PM - 4:28PM	Suzy Garcia 40.50 USD
06/21/2023	Correspond with Sprint Process servers regarding serving the Deposition Subpoena on J. Hall. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:25PM - 4:49PM	Suzy Garcia 54.00 USD
06/21/2023	Call potential La Pura witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:26PM - 4:32PM	Lorraine Weekes 44.50 USD
06/21/2023	Call potential La Pura witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 4:28PM - 5:22PM	Lorraine Weekes 400.50 USD
06/21/2023	Correspond with LitiCourt regarding change of time for Deposition of Defendant S. Adele. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:50PM - 5:02PM	Suzy Garcia 27.00 USD

06/21/2023	Message S. Garcia regarding Adele deposition scheduling. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:54PM - 9:00PM	Kevin Kneupper 81.50 USD
06/22/2023	Review correspondence from LV Investigations regarding service attempts of Deposition Subpoena on Janelle Zuniga, review Affricative of Non-Service; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:30PM - 2:06PM	Suzy Garcia 81.00 USD
06/22/2023	Review proof of service and correspondence from USA Express regarding service of the Subpoena to Aaron Wilson. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:05PM - 2:35PM	Suzy Garcia 67.50 USD
06/22/2023	Prepare and serve on all parties Deposition Subpoena of Jared Hall; conference calls with the Civil Division of Fulton County Sheriff's Department regarding personal service of Subpoena; and send Subpoena with all additional required documents to Fulton County's Sheriff's Department. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 2:30PM - 3:30PM	Suzy Garcia 135.00 USD
06/22/2023	E-mail opposing counsel regarding meet and confer request. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:02PM - 8:08PM	Kevin Kneupper 81.50 USD
06/25/2023	Review Quick Box production of contracts. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:08PM - 8:32PM	Kevin Kneupper 326.00 USD
06/25/2023	E-mail opposing counsel regarding Adele deposition logistics. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:32PM - 8:38PM	Kevin Kneupper 81.50 USD
06/25/2023	Draft e-mail requesting meet and confer on show cause order and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:38PM - 9:02PM	Kevin Kneupper 326.00 USD
06/25/2023	Conference with C. Covey regarding show cause motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:02PM - 9:08PM	Kevin Kneupper 81.50 USD
06/25/2023	E-mail opposing counsel requesting meet and confer on show cause motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:08PM - 9:14PM	Kevin Kneupper 81.50 USD
06/27/2023	Review resume of J. Sperber for mediation and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:49PM - 12:55PM	Kevin Kneupper 81.50 USD
06/27/2023	Message S. Garcia regarding court reporter and videographer for Adele deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:55PM - 1:01PM	Kevin Kneupper 81.50 USD
06/27/2023	E-mail D. Wright regarding Adele deposition location. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:01PM - 1:07PM	Kevin Kneupper 81.50 USD
06/27/2023	E-mail L. Tan regarding case update. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:07PM - 1:13PM	Kevin Kneupper 81.50 USD
06/27/2023	Correspond with Veritext and LitiCourt regarding quotes for the in-person Deposition of Stephene Adele; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:45PM - 2:15PM	Suzy Garcia 67.50 USD

06/28/2023	Prepare for and attend S. Adele deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	11:18 11:06AM - 10:24PM	Kevin Kneupper 9,209.50 USD
06/28/2023	Conference call and review and prepare several emails to and from LitiCourt regarding logistics and preparation for the Deposition of Stephen Adele. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:14PM - 2:38PM	Suzy Garcia 54.00 USD
06/28/2023	Review correspondence from LV Investigations regarding sub-service of Document Subpoena on Janelle Zuniga and update file; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:53PM - 3:17PM	Suzy Garcia 54.00 USD
06/29/2023	Locate last minute exhibits for Adele deposition, upload same to AgileLaw La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:54AM - 12:06PM	Cyclone Covey 163.00 USD
06/29/2023	Meet and confer with Konnektive counsel regarding discovery disputes. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:58PM - 3:22PM	Kevin Kneupper 326.00 USD
06/29/2023	Travel to and from S. Adele deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 10:36PM - 1:18AM ⁺¹	Kevin Kneupper 2,200.50 USD
06/30/2023	Prepare for and attend S. Adele deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	9:48 1:18AM - 11:06AM	Kevin Kneupper 7,987.00 USD
06/30/2023	Review correspondence from Sprint Process Servers regarding Invoices for service of Deposition Subpoena to Jared Hall. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:47PM - 1:59PM	Suzy Garcia 27.00 USD
06/30/2023	Review Defendants Quick Box and S. Adele's Response to Expense Report, S. Adele's Supplemental Declaration, and Order regarding same; update case file; calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:50PM - 3:14PM	Suzy Garcia 54.00 USD
06/30/2023	Review Minute Order regarding lodging an additional copy of Exhibits in support of Plaintiff's Motion for Class Certification; prepare Notice of Lodging; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 8:09PM - 8:45PM	Suzy Garcia 81.00 USD
06/30/2023	Meet and confer with opposing counsel regarding discovery disputes and discuss settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:48PM - 10:18PM	Kevin Kneupper 407.50 USD
07/03/2023	Review correspondences from Sprint Process Servers regarding service of Deposition Subpoena on Jared Hall ; correspond with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:00PM - 3:30PM	Suzy Garcia 67.50 USD
07/03/2023	Call with QuickBox counsel RE: mediation scheduling, discuss same w K Kneupper, follow up email to QB Counsel RE: Jumbleberry La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:50PM - 7:14PM	Cyclone Covey 326.00 USD
07/05/2023	Review email from Perkins (QB Counsel RE: Class Cert Exhibits), discuss same w S Garcia, compile exhibits and send files to Perkins via We Transfer La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:35PM - 1:47PM	Cyclone Covey 163.00 USD

07/05/2023	Correspond with C. Covey regarding lodged exhibits in support of Plaintiff's Motion for Class Certification; review case file regarding same; prepare Notice of Lodging regarding additional copy of Exhibits and send out for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:36PM - 1:48PM	Suzy Garcia 27.00 USD
07/05/2023	Correspond with C. Covey regarding lodged exhibits in support of Plaintiff's Motion for Class Certification; review case file regarding same; prepare Notice of Lodging regarding additional copy of Exhibits and send out for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 6:30PM - 7:06PM	Suzy Garcia 81.00 USD
07/06/2023	Prepare Deposition Subpoena re Jared Hall, cover letter to Fulton County Sheriff's Department, and check for personal service, and send out. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 6:00PM - 6:48PM	Suzy Garcia 108.00 USD
07/06/2023	Correspond with K. Kneupper regarding sub-service of Document Subpoena on Janell Zuniga and production date. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:09PM - 7:15PM	Suzy Garcia 13.50 USD
07/07/2023	Review Defendants' Opposition and supporting documents to Motion for Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 1:26PM - 2:32PM	Suzy Garcia 148.50 USD
07/07/2023	Review opposition to class certification and send notes to K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:23PM - 2:59PM	Cyclone Covey 489.00 USD
07/07/2023	Discuss Rivea deposition prep w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:59PM - 3:11PM	Cyclone Covey 163.00 USD
07/07/2023	Review Order regarding service address for La Pura Defendants and update Master Pleading Template; prepare shells for Plaintiff's Reply to Defendants' Opposition to Motion for Class certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 6:19PM - 7:01PM	Suzy Garcia 94.50 USD
07/09/2023	Draft reply brief on class certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 3:10PM - 5:16PM	Kevin Kneupper 1,711.50 USD
07/09/2023	Review Mastercard materials in response brief and e-mail Mastercard counsel regarding confidentiality designations. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:22PM - 3:40PM	Kevin Kneupper 244.50 USD
07/09/2023	Review updated subpoena to J. Hall and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:40PM - 3:46PM	Kevin Kneupper 81.50 USD
07/10/2023	Compile and produce call recording for J Reviea La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:37PM - 2:43PM	Cyclone Covey 81.50 USD
07/10/2023	Set up AgileLaw deposition and email zoom and AgileLaw information to opposing counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:15PM - 3:21PM	Cyclone Covey 81.50 USD
07/10/2023	Draft reply to class certification motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:18 7:43PM - 2:01AM ⁺¹	Kevin Kneupper 5,134.50 USD
07/11/2023	Draft class certification reply brief. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:18 8:51AM - 5:09PM	Kevin Kneupper 6,764.50 USD

07/11/2023	Prepare for Reviea Deposition - draft outline, review and compile exhibits La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:04PM - 12:16PM	Cyclone Covey 163.00 USD
07/11/2023	Prepare for Reviea Deposition - draft outline, review and compile exhibits La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 1:06PM - 2:30PM	Cyclone Covey 1,141.00 USD
07/11/2023	Email to QB settlement counsel (Perkins) RE: settlement demand La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:57PM - 3:03PM	Cyclone Covey 81.50 USD
07/11/2023	Prepare for Reviea Deposition - draft outline, review and compile exhibits La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 3:13PM - 4:37PM	Cyclone Covey 1,141.00 USD
07/11/2023	E-mail C. Queally regarding ticket production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:25PM - 7:43PM	Kevin Kneupper 244.50 USD
07/11/2023	Review Deposition Transcript of Geoffrey Clapp and correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:57PM - 9:15PM	Suzy Garcia 40.50 USD
07/11/2023	Attend J. Riviea deposition via Zoom and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:30 9:57PM - 2:27AM ⁺¹	Kevin Kneupper 3,667.50 USD
07/12/2023	Final preparations for Reviea deposition and taking of Reviea deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	5:30 8:15AM - 1:45PM	Cyclone Covey 4,482.50 USD
07/12/2023	Review reply brief on motion for class certification, discuss w K Kneupper and provide comments and suggested edits on same La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 4:53PM - 5:59PM	Cyclone Covey 896.50 USD
07/12/2023	Draft and file class certification reply brief. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:48 5:09PM - 9:57PM	Kevin Kneupper 3,912.00 USD
07/12/2023	Prepare Reply to Defendants' Joint Opposition to Motion for Class Certification and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:18 9:16PM - 2:34AM ⁺¹	Suzy Garcia 715.50 USD
07/13/2023	Call w Konnektive counsel RE: settlement and mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:57AM - 11:03AM	Cyclone Covey 81.50 USD
07/13/2023	E-mail C. Queally regarding meet and confer on discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:55PM - 3:07PM	Kevin Kneupper 163.00 USD
07/13/2023	Prepare and file Notice of Lodging Exh 1 to the Declaration of K. Kneupper ISO Reply to Joint Opposition to Motion for Class Certification; correspond with Nationwide Legal regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:17PM - 3:35PM	Suzy Garcia 40.50 USD
07/13/2023	Call w Quickbox counsel RE: mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:48PM - 4:00PM	Cyclone Covey 163.00 USD

07/14/2023	Review correspondence from LitiCourt regarding Deposition Transcript of Adele Stephe and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:28PM - 1:40PM	Suzy Garcia 27.00 USD
07/14/2023	Attend meet and confer with defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:07PM - 2:37PM	Cyclone Covey 407.50 USD
07/14/2023	Meet and confer with opposing counsel regarding discovery disputes. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 3:15PM - 3:57PM	Kevin Kneupper 570.50 USD
07/14/2023	Prepare courtesy copies of Plaintiff's Reply to Defendants' Joint Opposition to Motion for Class Certification and send to Hon. Linda Lopez. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 8:00PM - 8:42PM	Suzy Garcia 94.50 USD
07/18/2023	Review mediation procedures email and respond to mediator's assistant, discuss mediation brief w K Kneupper, email to mediator RE: plans for pre-mediation presentation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 7:08PM - 7:38PM	Cyclone Covey 407.50 USD
07/19/2023	Review case files regarding deposition transcripts and videos, in preparation for Mediation; correspond with several Court Reporting Agencies regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:58PM - 1:34PM	Suzy Garcia 81.00 USD
07/19/2023	Review Notice of Parties' Discovery Disputes Issues; review correspondence from opposing counsel regarding copies of native documents in support of Defendants' Opposition to Class Certification; update case file regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 1:28PM - 2:10PM	Suzy Garcia 94.50 USD
07/19/2023	Review case files regarding deposition transcripts and videos, in preparation for Mediation; correspond with several Court Reporting Agencies regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:31PM - 3:01PM	Suzy Garcia 67.50 USD
07/19/2023	Review motion to seal. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:47PM - 5:05PM	Kevin Kneupper 244.50 USD
07/20/2023	Review Quick Box's new document production. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 4:48PM - 6:12PM	Kevin Kneupper 1,141.00 USD
07/20/2023	Prepare for discovery hearing. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:54 9:09PM - 5:03AM ⁺¹	Kevin Kneupper 6,438.50 USD
07/22/2023	Call w WB settlement counsel Re mediation logistics; update to K Kneupper RE same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:00AM - 2:36AM	Cyclone Covey 489.00 USD
07/22/2023	Prepare for discovery hearing. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 3:51AM - 6:15AM	Kevin Kneupper 1,956.00 USD
07/22/2023	Attend discovery hearing. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:18 6:15AM - 10:33AM	Kevin Kneupper 3,504.50 USD
07/25/2023	Call w QB counsel RE: tax implications of individual settlement, discuss same with K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:03AM - 5:21AM	Cyclone Covey 244.50 USD

07/27/2023	Email to Konnektive counsel RE: scheduling mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:21AM - 9:33AM	Cyclone Covey 163.00 USD
07/27/2023	Conference with C. Covey regarding case status. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:48PM - 3:54PM	Kevin Kneupper 81.50 USD
07/28/2023	Draft email to QB counsel (Perkins) RE: individual settlement, send same to K Kneupper for review and comment. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:55AM - 7:25AM	Cyclone Covey 407.50 USD
07/28/2023	Review correspondence from the Fulton Sheriff's Office; prepare correspondence and send Subpeon to Jared Hall to Fulton Sheriff's Department with correct for of payment. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 5:52PM - 6:28PM	Suzy Garcia 81.00 USD
07/28/2023	Review Quick Box document production and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 11:28PM - 11:52PM	Kevin Kneupper 326.00 USD
07/28/2023	Prepare RFP's to Konnektive on alter ego and e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 11:55PM - 12:19AM ⁺¹	Kevin Kneupper 326.00 USD
07/29/2023	Review Video depositions of Quickbox and Konnektive employees, index and find key parts to include in mediation presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	4:54 10:41PM - 3:35AM ⁺¹	Cyclone Covey 3,993.50 USD
07/30/2023	Analyze transaction data for mediation and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 12:19AM - 2:07AM	Kevin Kneupper 1,467.00 USD
07/30/2023	E-mail C. Queally regarding meet and confer and document questions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:07AM - 2:19AM	Kevin Kneupper 163.00 USD
07/30/2023	Revise prior mediation presentation, add slides discussing new developments, include video snippets La Pura - Tan v Quickbox [LTAN-CA-200128]	5:42 3:23AM - 9:05AM	Cyclone Covey 4,645.50 USD
07/31/2023	Revise slideshow, record and render video to send to mediator explaining Quickbox's liability and potential for damages La Pura - Tan v Quickbox [LTAN-CA-200128]	5:54 9:05AM - 2:59PM	Cyclone Covey 4,808.50 USD
07/31/2023	Serve Plaintiff's Third Requests for Production of Documents on all Defendants; calendar all relevant dates regardign same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:56PM - 2:32PM	Suzy Garcia 81.00 USD
07/31/2023	E-mail R. Poteet regarding meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:15PM - 2:21PM	Kevin Kneupper 81.50 USD
07/31/2023	Review mediation video and message C. Covey regarding edits. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 9:35PM - 11:05PM	Kevin Kneupper 1,222.50 USD
08/01/2023	Review Orders regarding Discovery Hearing and Motion to Defer Rulings on Class Certification; update case file and calendar all relevant deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:08PM - 2:02PM	Suzy Garcia 121.50 USD

08/02/2023	Meet and confer with R. Poteet regarding discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:11AM - 1:23AM	Kevin Kneupper 163.00 USD
08/02/2023	Review draft settlement with Quick Box parties and research issues relating to same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 1:23AM - 3:29AM	Kevin Kneupper 1,711.50 USD
08/02/2023	Message C. Covey regarding Quick Box draft settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:29AM - 3:41AM	Kevin Kneupper 163.00 USD
08/02/2023	Review latest production of documents from Konnektive RE: FunnelKonnekt templates La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:53PM - 1:11PM	Cyclone Covey 244.50 USD
08/02/2023	Review draft settlement proposal from QB counsel and K Kneupper's comments, review applicable cases RE: requirements of class settlement, add comments to send to K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:11PM - 1:47PM	Cyclone Covey 489.00 USD
08/02/2023	Research and review applicable case law on the effect of differing settlement and litigation class definitions pre-certification when only partial settlement is reached. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:47PM - 2:41PM	Cyclone Covey 733.50 USD
08/03/2023	Analyze QB spreadsheet against Konnektive Data produced La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 8:39AM - 9:33AM	Cyclone Covey 733.50 USD
08/03/2023	Quickbox Mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	11:00 12:00PM - 11:00PM	Cyclone Covey 8,965.00 USD
08/03/2023	Attend mediation with Quick Box Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	10:42 1:58PM - 12:40AM ⁺¹	Kevin Kneupper 8,720.50 USD
08/04/2023	Calls w mediator, email to mediator, discuss settlement scenarios w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:44PM - 2:08PM	Cyclone Covey 326.00 USD
08/04/2023	Prepare 30(b)(1) Deposition Notices for K. Martorano, J. Martorano, M. Martorano, J. Martell and C. Biggins, serve on all parties and calendar all related deadlines; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 6:16PM - 8:10PM	Suzy Garcia 256.50 USD
08/05/2023	Conference with and message C. Covey regarding settlement proposal with Quick Box Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:40AM - 12:58AM	Kevin Kneupper 244.50 USD
08/05/2023	Draft deposition notices and message S. Garcia regarding service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:40AM - 2:34AM	Kevin Kneupper 733.50 USD
08/05/2023	Draft e-mail to opposing counsel regarding discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:34AM - 2:58AM	Kevin Kneupper 326.00 USD
08/07/2023	Draft joint stipulation on financial condition documents. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:58AM - 3:16AM	Kevin Kneupper 244.50 USD

08/07/2023	Conference with C. Covey regarding settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:16AM - 3:22AM	Kevin Kneupper 81.50 USD
08/07/2023	Review draft memorandum of understanding and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:22AM - 3:40AM	Kevin Kneupper 244.50 USD
08/07/2023	Draft updated version of stipulation on financial condition production and e-mail to counsel for defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:40AM - 3:58AM	Kevin Kneupper 244.50 USD
08/07/2023	Import scrubbed emails from various tables produced by defendants, work on mass email system setup to email all victims of La Pura scam to find evidence to help with the trial. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:06 8:55AM - 1:01PM	Cyclone Covey 3,341.50 USD
08/07/2023	Correspond with Court Reporters regarding update on reservations for upcoming depositions and make new reservations for the Depositions of C. Biggins, J. Martell and the Martoranos; conference call with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 11:41AM - 12:23PM	Suzy Garcia 94.50 USD
08/07/2023	Scrub Quick Box data and multiple spreadsheets and data sets produced by Konnektive to obtain a clean list of victim names and emails, remove duplicates from over 60,000 records, remove all test entries La Pura - Tan v Quickbox [LTAN-CA-200128]	3:18 12:03PM - 3:21PM	Cyclone Covey 2,689.50 USD
08/07/2023	Phone call with Quick Box mediator, review proposed MOU from Quick Box, discuss same with K Kneupper, email and phone call to Quick Box counsel RE: executing same and next steps La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:21PM - 3:45PM	Cyclone Covey 326.00 USD
08/07/2023	Phone call w Ms. Tan RE: partial settlement, send settlement agreement to Ms. Tan for execution. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:45PM - 4:03PM	Cyclone Covey 244.50 USD
08/07/2023	Finalize and file Joint Stipulation Regarding Defendants' Financial Documents; review case docket and update case file; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 9:50PM - 10:26PM	Suzy Garcia 81.00 USD
08/08/2023	Conference call with Fulton County's Sheriff's Department regarding status of service of Deposition Subpoena regarding Jared Hall. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:40PM - 4:58PM	Suzy Garcia 40.50 USD
08/08/2023	Set up and send initial email blast to La Pura victims looking for people with information for the case La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 6:08PM - 6:50PM	Cyclone Covey 570.50 USD
08/09/2023	Review email and proposed filings from Quick Box counsel RE: discovery stay and respond to same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:38PM - 5:50PM	Cyclone Covey 163.00 USD
08/09/2023	Email Quick Box counsel RE: next steps in moving settlement forward La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:50PM - 5:56PM	Cyclone Covey 81.50 USD

08/09/2023	Review proposed status update to court sent by Quick Box, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:56PM - 6:08PM	Cyclone Covey 163.00 USD
08/09/2023	Review draft motion to stay and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:29PM - 6:35PM	Kevin Kneupper 81.50 USD
08/09/2023	E-mail opposing counsel regarding withdrawal of Biggins and Martell deposition notices. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:35PM - 6:41PM	Kevin Kneupper 81.50 USD
08/09/2023	Troubleshoot bounced emails from email blast, correct issues with software for next email blast to other victims La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 6:50PM - 7:38PM	Cyclone Covey 652.00 USD
08/09/2023	Call to La Pura victim who responded to email (Faye Lemley) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:38PM - 7:50PM	Cyclone Covey 163.00 USD
08/10/2023	Correspond with Huseby Court Reporters regarding cancelation of Depositions of C. Biggins and J. Martell and update calendar regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:30AM - 11:42AM	Suzy Garcia 27.00 USD
08/10/2023	Call w Konnektive counsel RE: mediation, notes RE: same for file La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:23PM - 2:35PM	Cyclone Covey 163.00 USD
08/10/2023	Call w M Cook (La Pura Victim) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:37PM - 2:49PM	Cyclone Covey 163.00 USD
08/10/2023	Call w Amy Hahn (La Pura Victim) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:49PM - 3:07PM	Cyclone Covey 244.50 USD
08/10/2023	Review e-mail from court on request to vacate and e-mail opposing counsel regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:39PM - 5:51PM	Kevin Kneupper 163.00 USD
08/11/2023	Call w Konnektive counsel RE: settlement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:51PM - 9:09PM	Cyclone Covey 244.50 USD
08/11/2023	Calls and emails with La Pura victims La Pura - Tan v Quickbox [LTAN-CA-200128]	3:24 9:09PM - 12:33AM ⁺¹	Cyclone Covey 2,771.00 USD
08/14/2023	Edit draft joint stipulation on financial condition documents and e-mail C. Queally regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:49AM - 8:13AM	Kevin Kneupper 326.00 USD
08/14/2023	Watch video re: how to contact witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:04PM - 12:16PM	Lorraine Weekes 89.00 USD
08/14/2023	Call victims La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:14PM - 12:20PM	Lorraine Weekes 44.50 USD
08/14/2023	E-mail C. Queally regarding various discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:43PM - 3:55PM	Kevin Kneupper 163.00 USD

08/14/2023	Emails and phone calls with dozens of La Pura victims La Pura - Tan v Quickbox [LTAN-CA-200128]	7:48 9:43PM - 5:31AM ⁺¹	Cyclone Covey 6,357.00 USD
08/15/2023	Call Scott re: admin of settlement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:23AM - 11:29AM	Lorraine Weekes 44.50 USD
08/15/2023	Message C. Covey and S. Garcia regarding J. Hall subpoena. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:37AM - 11:43AM	Kevin Kneupper 81.50 USD
08/15/2023	Conference with opposing counsel and proposed claims administrator. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 11:43AM - 12:13PM	Kevin Kneupper 407.50 USD
08/15/2023	Email to Konnektive counsel RE: settlement conference, discuss reply with K Kneupper, draft response email outlining Plaintiff's position on settlement and deferring class cert ruling and depositions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:55PM - 2:19PM	Cyclone Covey 326.00 USD
08/15/2023	Review draft settlement with Quick Box and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:17PM - 2:53PM	Kevin Kneupper 489.00 USD
08/15/2023	E-mail NCLC regarding process as potential cy pres recipient for settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:53PM - 3:05PM	Kevin Kneupper 163.00 USD
08/15/2023	Correspond with Fulton County Sheriffs' Department regarding status of service of Deposition Notice on Jared Hall; correspond with K. Kneupper regarding Martorano Depositions and case status. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:16PM - 3:28PM	Suzy Garcia 27.00 USD
08/15/2023	Correspond with Fulton County Sheriffs' Department regarding status of service of Deposition Notice on Jared Hall; correspond with K. Kneupper regarding Martorano Depositions and case status. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:36PM - 3:54PM	Suzy Garcia 40.50 USD
08/15/2023	Emails with client and court RE: scheduling settlement conference La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:26PM - 5:32PM	Cyclone Covey 81.50 USD
08/15/2023	Emails to dozens of victims of La Pura to find witnesses for case La Pura - Tan v Quickbox [LTAN-CA-200128]	4:30 5:32PM - 10:02PM	Cyclone Covey 3,667.50 USD
08/16/2023	Correspond with Fulton County Sheriffs' Department regarding status of service of Deposition Notice on Jared Hall. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:25PM - 2:43PM	Suzy Garcia 40.50 USD
08/16/2023	Discuss state of service of subpoena of witness Hall w S Garcia, email to opposing counsel RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:02PM - 3:14PM	Cyclone Covey 163.00 USD
08/16/2023	Emails to victims of La Pura to find witnesses for case, call with victim, compile list of additional potential witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 3:14PM - 5:08PM	Cyclone Covey 1,548.50 USD

08/16/2023	Conference with NCLC representative regarding cy pres award. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:47PM - 4:05PM	Kevin Kneupper 244.50 USD
08/16/2023	Review Konnektive document productions and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 4:05PM - 4:59PM	Kevin Kneupper 733.50 USD
08/16/2023	Draft and serve third amended initial disclosures. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:59PM - 5:23PM	Kevin Kneupper 326.00 USD
08/16/2023	Serve Plaintiffs' Third Amended Initial Disclosures. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 8:45PM - 9:21PM	Suzy Garcia 81.00 USD
08/18/2023	Edit deposition notices for Martoranos and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:08PM - 2:20PM	Kevin Kneupper 163.00 USD
08/18/2023	Draft subpoena to Aaron Turgeman. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:23PM - 8:47PM	Kevin Kneupper 326.00 USD
08/18/2023	Prepare and serve First Amended Notices of Depositions of the Martoranos; and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 8:45PM - 9:33PM	Suzy Garcia 108.00 USD
08/19/2023	Review emails from victims to find potential CA witnesses, respond to all emails La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:40AM - 9:04AM	Cyclone Covey 326.00 USD
08/21/2023	Respond to victim emails La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:07AM - 9:13AM	Cyclone Covey 81.50 USD
08/21/2023	Respond to victim emails La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 9:08AM - 9:50AM	Cyclone Covey 570.50 USD
08/21/2023	Respond to victim emails La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 10:30AM - 11:36AM	Cyclone Covey 896.50 USD
08/21/2023	Prepare and serve Plaintiff's Deposition Subpoena to Amit Aaron Turgeman. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 1:39PM - 2:27PM	Suzy Garcia 108.00 USD
08/21/2023	Calls with La Pura victims that could be potential witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 3:42PM - 4:18PM	Cyclone Covey 489.00 USD
08/21/2023	Email to A Turgeman RE: subpoena La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:18PM - 4:30PM	Cyclone Covey 163.00 USD
08/22/2023	Conference with C. Covey regarding Quick Box settlement terms. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:13PM - 6:19PM	Kevin Kneupper 81.50 USD
08/22/2023	Call w QB counsel on settlement details, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:06PM - 8:24PM	Cyclone Covey 244.50 USD

08/23/2023	E-mail C. Queally regarding Microsoft production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:55PM - 2:01PM	Kevin Kneupper 81.50 USD
08/23/2023	E-mail C. Queally regarding question about P. Ngo deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:01PM - 2:07PM	Kevin Kneupper 81.50 USD
08/24/2023	Emails with La Pura victims that could be potential witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 6:58PM - 7:52PM	Cyclone Covey 733.50 USD
08/27/2023	Review draft settlement with Quick Box and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:54PM - 7:18PM	Kevin Kneupper 326.00 USD
08/28/2023	Review Subpoenas for Document Production to Ask Telemarketing, Focus Commerce LLC, First Data, Humboldt Merchant Services, Visa, Global E-Trading, and Midigator, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 1:32PM - 2:14PM	Suzy Garcia 94.50 USD
08/28/2023	Review Subpoenas for Document Production to Ask Telemarketing, Focus Commerce LLC, First Data, Humboldt Merchant Services, Visa, Global E-Trading, and Midigator, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:17PM - 2:29PM	Suzy Garcia 27.00 USD
08/28/2023	Review Joint Motions and Minute Orders regarding Joint Stipulations and Settlement; update case file; and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 2:28PM - 3:16PM	Suzy Garcia 108.00 USD
08/28/2023	Review Central District's Mandatory Settlement Conference Procedures for Magistrate Judge D. Leshner; calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:12PM - 3:30PM	Suzy Garcia 40.50 USD
08/28/2023	Email to Konnektive counsel RE: settlement demand La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:54PM - 6:06PM	Cyclone Covey 163.00 USD
08/28/2023	Review proposed settlement with QuickBox, reply to opposing counsel RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:06PM - 6:12PM	Cyclone Covey 81.50 USD
08/28/2023	Message C. Covey regarding e-mail about draft settlement with Quick Box. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:24PM - 7:30PM	Kevin Kneupper 81.50 USD
08/29/2023	More calls and emails with La Pura victims La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 4:05PM - 4:41PM	Cyclone Covey 489.00 USD
08/30/2023	Correspond with abc Legal regarding personal service of Deposition Subpoena on Aaron Turgeman. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:51PM - 1:03PM	Suzy Garcia 27.00 USD
08/30/2023	Review Konnektive LLC financials and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:10PM - 5:28PM	Kevin Kneupper 244.50 USD
08/30/2023	Review K. Martorano motion for summary judgment. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:28PM - 5:58PM	Kevin Kneupper 407.50 USD

09/01/2023	Review Defendant K. Martorano's Motion for Summary Judgment, update file, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:53PM - 5:23PM	Suzy Garcia 67.50 USD
09/01/2023	Review Defendant K. Martorano's Motion for Summary Judgment, update file, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:07PM - 6:19PM	Suzy Garcia 27.00 USD
09/06/2023	Review correspondence from abc Legal regarding status of service of Deposition Subpoena on Amit Aaron Turgeman; correspond with Huseby regarding reservation of Videographer and Court Reporter, in preparation for deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:23PM - 5:41PM	Suzy Garcia 40.50 USD
09/07/2023	Begin drafting 30(b)(6) notice for Konnektive La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:36AM - 8:48AM	Cyclone Covey 163.00 USD
09/07/2023	Email more La Pura victims La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:00AM - 11:06AM	Cyclone Covey 81.50 USD
09/07/2023	Collect all archive.org URLs needed for authentication La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 11:00AM - 12:00PM	Cyclone Covey 815.00 USD
09/07/2023	Call w Konnektive counsel as required by judge's order for settlement conference La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:12PM - 3:24PM	Cyclone Covey 163.00 USD
09/08/2023	Continue drafting 30(b)(6) topics for Konnektive La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 8:36AM - 9:30AM	Cyclone Covey 733.50 USD
09/08/2023	Continue reviewing archive.org URLs needed for authentication La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:26PM - 1:02PM	Cyclone Covey 489.00 USD
09/08/2023	Call with potential witness about La Pura La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:02PM - 2:26PM	Cyclone Covey 326.00 USD
09/11/2023	Emails to La Pura victim, potential witnesses to schedule calls La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:37PM - 6:43PM	Cyclone Covey 81.50 USD
09/12/2023	Draft proposed stipulation on MSJ response deadline. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:36PM - 8:00PM	Kevin Kneupper 326.00 USD
09/14/2023	File Joint Stipulation and Proposed Order Regarding Deadline to Respond to Motion for Summary Judgment by Kathryn Martorano. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:15AM - 1:39AM	Suzy Garcia 54.00 USD
09/14/2023	Draft settlement conference statement and letter. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:48 2:19PM - 7:07PM	Kevin Kneupper 3,912.00 USD
09/14/2023	Zoom w potential witness, email to another potential witness on possible deposition dates La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:19PM - 4:37PM	Cyclone Covey 244.50 USD
09/15/2023	Draft and serve settlement conference statement and letter. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:36 7:07PM - 2:43AM ⁺¹	Kevin Kneupper 6,194.00 USD

09/18/2023	Review additional Konnektive pages on archive.org needed for verification for authenticity La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 4:05PM - 4:47PM	Cyclone Covey 570.50 USD
09/20/2023	Review A. Kulvet subpoena and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:37AM - 3:43AM	Kevin Kneupper 81.50 USD
09/20/2023	Review final draft of settlement with Quick Box parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 4:49AM - 6:37AM	Kevin Kneupper 1,467.00 USD
09/20/2023	E-mail NCLC regarding cy pres declaration for settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:37AM - 6:43AM	Kevin Kneupper 81.50 USD
09/20/2023	Prepare Deposition Subpoena with Document Production regarding Alan Kluvete; several conference calls with Court Reporters in MA, in preparation for Mr. Kulvete's deposition; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 12:33PM - 2:03PM	Suzy Garcia 202.50 USD
09/21/2023	Review settlement drafts for Quick Box and message C. Covey regarding comments. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 7:43AM - 8:19AM	Kevin Kneupper 489.00 USD
09/21/2023	Review K Kneupper's settlement comments, check redline, make final edits to next draft of QB settlement documents and send to QB counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:12PM - 6:36PM	Cyclone Covey 326.00 USD
09/22/2023	Review Order to Continue Deadlines for Kathryn Martorano's Motion for Summary Judgment and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:13PM - 1:25PM	Suzy Garcia 27.00 USD
09/22/2023	Review Non-Party First Data's Objections to Document Subpoena served by Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:00PM - 2:12PM	Suzy Garcia 27.00 USD
09/24/2023	Research settlement offset issue for Konnektive settlement conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 4:11PM - 5:41PM	Kevin Kneupper 1,222.50 USD
09/25/2023	Several conference calls with third party vendors regarding reservations for deposition of Alan Kulvete; prepare Deposition Subpoena regarding same and serve. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 12:05PM - 1:05PM	Suzy Garcia 135.00 USD
09/25/2023	Email and call w client to prep for settlement conference La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:47PM - 12:59PM	Cyclone Covey 163.00 USD
09/25/2023	Review and finalize subpoena, email same to witness for upcoming deposition, plan travel to Boston La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:59PM - 1:29PM	Cyclone Covey 407.50 USD
09/25/2023	Review Humboldt response to Konnektive subpoena and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:23PM - 7:35PM	Kevin Kneupper 163.00 USD
09/26/2023	Bates stamp documents La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:12PM - 2:30PM	Elyssa Gerber 22.50 USD

09/26/2023	Serve Deposition Subpoena To Alan Kulvete on all parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:53PM - 3:29PM	Suzy Garcia 81.00 USD
09/26/2023	Phone call with potential witness RE: deposition scheduling, review subpoena, compile documents from witness to produce to defendants La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:55PM - 6:13PM	Cyclone Covey 244.50 USD
09/27/2023	Conference with C. Covey regarding Konnektive case presentations strategy. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 3:14AM - 4:02AM	Kevin Kneupper 652.00 USD
09/27/2023	Mediation with Konnektive La Pura - Tan v Quickbox [LTAN-CA-200128]	5:00 9:00AM - 2:00PM	Cyclone Covey 4,075.00 USD
09/27/2023	Review next steps for depositions, evidence needed, and trial prep planning w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 2:00PM - 2:48PM	Cyclone Covey 652.00 USD
09/27/2023	Review revised settlement draft from QB, discuss same w K Kneupper and email QB counsel RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:35PM - 3:47PM	Cyclone Covey 163.00 USD
09/27/2023	Prepare for and attend Konnektive settlement conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:42 10:32PM - 3:14AM ⁺¹	Kevin Kneupper 3,830.50 USD
09/28/2023	Review applicable law on authentication of documents and admissibility La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 12:02PM - 1:08PM	Cyclone Covey 896.50 USD
09/29/2023	E-mail C. Queally regarding deposition scheduling. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:26AM - 5:32AM	Kevin Kneupper 81.50 USD
09/29/2023	Review and respond to Konnektive counsel's emails RE: deposition scheduling La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:40PM - 4:46PM	Cyclone Covey 81.50 USD
10/02/2023	Review and calendar all related deadlines regarding Orders regarding Settlement Status Conference and Leave to File Sealed Documents In Support of Motion for Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:35PM - 12:59PM	Suzy Garcia 54.00 USD
10/02/2023	Prepare Parties' Joint Status Report regarding Settlement and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:58PM - 3:34PM	Suzy Garcia 81.00 USD
10/02/2023	Review and edit status update to court La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:57PM - 4:09PM	Cyclone Covey 163.00 USD
10/02/2023	Prepare Parties' Joint Status Report regarding Settlement and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:55PM - 5:13PM	Suzy Garcia 40.50 USD
10/03/2023	E-mail opposing counsel regarding joint status update. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:11PM - 6:29PM	Kevin Kneupper 244.50 USD

10/04/2023	Prepare Joint Motion regarding Settlement and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:49PM - 1:25PM	Suzy Garcia 81.00 USD
10/04/2023	E-mail S. Garcia regarding filing joint status update. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:35PM - 6:41PM	Kevin Kneupper 81.50 USD
10/05/2023	Prepare and serve Amended Deposition Notices for Jacob Martell, Matthew Martorano, and Kathryn Martorano; review Defendants' Document Subpoena to National Merchants Association, update case file, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:24PM - 1:00PM	Suzy Garcia 81.00 USD
10/05/2023	Prepare and serve Amended Deposition Notices for Jacob Martell, Matthew Martorano, and Kathryn Martorano; review Defendants' Document Subpoena to National Merchants Association, update case file, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 2:00PM - 2:48PM	Suzy Garcia 108.00 USD
10/05/2023	Review Objections to Document Subpoena to National Merchants Association, case Docket, and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:57PM - 3:27PM	Suzy Garcia 67.50 USD
10/05/2023	Call w Konnektive attorney about settlement and case status, update K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:03PM - 3:15PM	Cyclone Covey 163.00 USD
10/05/2023	Prepare Sealed Exhibits In Support of Motion for Class Certification to be sent to Mastercard. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:29PM - 4:41PM	Suzy Garcia 27.00 USD
10/05/2023	Review court order on motion to seal and e-mail Mastercard lawyers regarding documents at issue. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 5:12PM - 5:48PM	Kevin Kneupper 489.00 USD
10/08/2023	E-mail opposing counsel regarding final execution version of Quick Box settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:07PM - 10:13PM	Kevin Kneupper 81.50 USD
10/08/2023	Download and review Fserve production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 10:25PM - 10:55PM	Kevin Kneupper 407.50 USD
10/10/2023	Conference with C. Covey regarding settlement conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:53PM - 1:59PM	Kevin Kneupper 81.50 USD
10/11/2023	Participate in case mediation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:00PM - 12:36PM	Lorraine Weekes 267.00 USD
10/11/2023	Attend status conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:41PM - 3:11PM	Kevin Kneupper 407.50 USD
10/11/2023	Review Court's Minute Order regarding today's Status Conference, update case file, and calendar all relevant deadlines; review Defendants' Subpoenas to Paysafe and National Merchants Association and calendar all relevant deadlines.. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:44PM - 10:02PM	Suzy Garcia 40.50 USD

10/13/2023	Review execution version of QuickBox Settlement Agreement, send to client for signature La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:22PM - 3:40PM	Cyclone Covey 244.50 USD
10/13/2023	Prepare Declaration of K. Kneupper regarding Service of Oder Dkt No. 344. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 8:59PM - 9:29PM	Suzy Garcia 67.50 USD
10/16/2023	E-mail C. Queally regarding financial condition document production. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:48PM - 7:54PM	Kevin Kneupper 81.50 USD
10/18/2023	Revise 30(b)(6) notice to Konnektive La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 8:13AM - 8:37AM	Cyclone Covey 326.00 USD
10/18/2023	Prepare and produce tenth document production (Turgeman interview) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 10:00AM - 10:18AM	Cyclone Covey 244.50 USD
10/18/2023	Conference with J. Hawkins and C. Covey regarding expert retention. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:06PM - 9:36PM	Kevin Kneupper 407.50 USD
10/19/2023	Correspond with Huseby Court reporters in preparation for Deposition of Aaron Turgeman, scheduled for Monday 10/23/23. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:40PM - 12:52PM	Suzy Garcia 27.00 USD
10/19/2023	Emails to potential expert witnesses to set up interviews La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:24PM - 5:42PM	Cyclone Covey 244.50 USD
10/20/2023	Conference with potential payment processing expert. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:59AM - 11:23AM	Kevin Kneupper 326.00 USD
10/20/2023	Call w potential expert La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:30PM - 4:54PM	Cyclone Covey 326.00 USD
10/22/2023	Prepare for Turgeman deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:47PM - 4:11PM	Cyclone Covey 326.00 USD
10/23/2023	Conduct Turgeman deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	3:06 8:30AM - 11:36AM	Cyclone Covey 2,526.50 USD
10/23/2023	Attend deposition of A. Turgeman. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:30 10:26PM - 12:56AM ⁺¹	Kevin Kneupper 2,037.50 USD
10/24/2023	Assemble exhibits and prepare for Kulvete deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 9:10AM - 10:28AM	Cyclone Covey 1,059.50 USD
10/24/2023	Draft motion to approve Quick Box settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:42 3:57PM - 8:39PM	Kevin Kneupper 3,830.50 USD
10/24/2023	Correspond with Westford Inn regarding reservation for the Deposition of Mr. Kulvete. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:23PM - 5:35PM	Suzy Garcia 27.00 USD

10/25/2023	Review draft declaration from NCLC and e-mail P. Laurent regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:08AM - 2:20AM	Kevin Kneupper 163.00 USD
10/25/2023	Take Kulvete deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	4:06 9:15AM - 1:21PM	Cyclone Covey 3,341.50 USD
10/25/2023	Attend Kulvete deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 2:51PM - 3:51PM	Kevin Kneupper 815.00 USD
10/25/2023	E-mail C. Queally regarding financial condition documents and supplemental brief on class certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:51PM - 3:57PM	Kevin Kneupper 81.50 USD
10/25/2023	Prepare and file Declaration of K. Kneupper regarding Service of Oder No. 344 on Third Parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:44PM - 6:14PM	Suzy Garcia 67.50 USD
10/25/2023	Review draft declaration regarding service of court order and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:39PM - 8:51PM	Kevin Kneupper 163.00 USD
10/26/2023	Draft initial ROGS to serve on Konnektive La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 10:29AM - 11:05AM	Cyclone Covey 489.00 USD
10/26/2023	Review excel spreadsheets and SQL tables, rerun damages analysis queries and verify same, edit declaration to file in support of the motion for preliminary approval for the settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 2:14PM - 4:08PM	Cyclone Covey 1,548.50 USD
10/27/2023	Call w potential expert witness La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 11:58AM - 12:40PM	Cyclone Covey 570.50 USD
10/27/2023	E-mail C. Queally regarding meet and confer request on class certification supplemental brief. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:19PM - 3:37PM	Kevin Kneupper 244.50 USD
10/27/2023	Draft motion for preliminary approval of Quick Box settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:24 3:37PM - 11:01PM	Kevin Kneupper 6,031.00 USD
10/29/2023	Draft motion for preliminary approval of Quick Box settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:36 11:01PM - 2:37AM ⁺¹	Kevin Kneupper 2,934.00 USD
10/30/2023	Call w potential expert La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:49AM - 10:55AM	Cyclone Covey 81.50 USD
10/30/2023	Review case docket and update all pleadings. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:44PM - 12:56PM	Suzy Garcia 27.00 USD
10/30/2023	Draft motion for preliminary approval of settlement with Quick Box. La Pura - Tan v Quickbox [LTAN-CA-200128]	10:42 7:36PM - 6:18AM ⁺¹	Kevin Kneupper 8,720.50 USD
10/30/2023	Prepare Motion for Preliminary Approval and Exhibits for filing; file Motion for Preliminary Approval and all supporting documents. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 11:00PM - 1:06AM ⁺¹	Suzy Garcia 283.50 USD

10/31/2023	Prepare Motion for Preliminary Approval and Exhibits for filing; file Motion for Preliminary Approval and all supporting documents. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 1:22AM - 2:28AM	Suzy Garcia 148.50 USD
10/31/2023	E-mail C. Queally regarding motion for leave to supplement class cert briefing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:37AM - 2:43AM	Kevin Kneupper 81.50 USD
10/31/2023	Prepare Motion for Preliminary Approval and Exhibits for filing; file Motion for Preliminary Approval and all supporting documents. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:12 12:25PM - 4:37PM	Suzy Garcia 567.00 USD
10/31/2023	Finalize draft of motion to approve settlement and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 5:00PM - 7:36PM	Kevin Kneupper 2,119.00 USD
11/01/2023	Meet and confer w Konnektive counsel on motion to supplement class cert motion, financial condition disclosure, and 30b6 deposition; discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:00PM - 4:12PM	Cyclone Covey 163.00 USD
11/01/2023	Meet and confer with C. Queally and C. Covey regarding financial condition documents and motion for leave to supplement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:48PM - 5:00PM	Kevin Kneupper 163.00 USD
11/02/2023	Conference with C. Covey regarding drafting 30(b)(6) topics to Konnektive Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 6:18AM - 8:00AM	Kevin Kneupper 1,385.50 USD
11/02/2023	Prep for call w S Baker expert and conduct intro call with expert reviewing documents La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 10:33AM - 11:51AM	Cyclone Covey 1,059.50 USD
11/02/2023	Revise and add to 30(b)(6) topics for Konnektive, work with K Kneupper to refine topics and find relevant documents to refer to in 30b6 notice La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 1:45PM - 3:45PM	Cyclone Covey 1,630.00 USD
11/02/2023	Revise and add to 30(b)(6) topics for Konnektive, work with K Kneupper to refine topics and find relevant documents to refer to in 30b6 notice La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:07PM - 5:37PM	Cyclone Covey 407.50 USD
11/02/2023	Review correspondence regarding Deposition Transcript of Alan Kulvete, update file, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:01PM - 7:19PM	Suzy Garcia 40.50 USD
11/03/2023	Draft second joint stipulation for MSJ deadline and e-mail C. Queally regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:36AM - 8:54AM	Kevin Kneupper 244.50 USD
11/03/2023	Edit draft of 30(b)(6) notice and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 9:48AM - 11:24AM	Kevin Kneupper 1,304.00 USD
11/03/2023	Prepare and file Second Joint Stipulation Re: Deadline to Respond to K. Martorano's MSJ. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:51PM - 7:21PM	Suzy Garcia 67.50 USD

11/03/2023	Prepare and serve 30(b)(6) Deposition Notices to Konnektive LLC and Converging Resources Corporation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 10:36PM - 11:18PM	Suzy Garcia 94.50 USD
11/03/2023	Review files for topics to cover in 30b6 deposition of Konnektive LLC and Converging Resources Corp, discuss topics and files w K Kneupper, revise notices and pull applicable documents, compile and complete 11th production of documents in conjunction with notice of deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	4:18 10:57PM - 3:15AM ⁺¹	Cyclone Covey 3,504.50 USD
11/06/2023	Conference with C. Covey regarding depositions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:01PM - 2:25PM	Kevin Kneupper 326.00 USD
11/06/2023	Draft motion to supplement and motion for leave to file it; message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:48 7:42PM - 11:30PM	Kevin Kneupper 3,097.00 USD
11/07/2023	Prepare Motion for Leave to File Supplemental Motion for Class Certification; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:06AM - 2:00AM	Suzy Garcia 121.50 USD
11/07/2023	Assemble documents for Kathryn Martorano deposition, being drafting deposition outline and marking exhibits for deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 9:39AM - 11:27AM	Cyclone Covey 1,467.00 USD
11/07/2023	Assemble documents for Kathryn Martorano deposition, being drafting deposition outline and marking exhibits for deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 11:33AM - 12:03PM	Cyclone Covey 407.50 USD
11/07/2023	Conference call with C. Covey regarding the November depositions for the Martoranos and Konnektive. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:33PM - 1:45PM	Suzy Garcia 27.00 USD
11/07/2023	Assemble documents for Kathryn Martorano deposition, being drafting deposition outline and marking exhibits for deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 2:14PM - 4:38PM	Cyclone Covey 1,956.00 USD
11/07/2023	Review materials for M. Martorano deposition and prepare deposition outline modules. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:48 2:32PM - 8:20PM	Kevin Kneupper 4,727.00 USD
11/07/2023	Review case docket and update file; review Order regarding Second Joint Stipulation regarding Martorano's Motion for Summary Judgment Briefing Schedule and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 4:54PM - 5:30PM	Suzy Garcia 81.00 USD
11/08/2023	Continue K Martorano Depo prep La Pura - Tan v Quickbox [LTAN-CA-200128]	5:42 8:32AM - 2:14PM	Cyclone Covey 4,645.50 USD
11/08/2023	Prepare and file Plaintiff's Motion for Leave to File Supplemental Motion in Support of Class Certification; prepare Notice of Lodging Exhibits In Support of Motion for Leave to file Preliminary Approval of Class Action Settlement; correspond with NWL regarding Lodging Exhs 12 & 18. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 12:04PM - 1:40PM	Suzy Garcia 216.00 USD
11/08/2023	Review notice of lodging and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:02PM - 1:08PM	Kevin Kneupper 81.50 USD

11/08/2023	Review final drafts of motion for leave to file supplemental brief and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:08PM - 1:20PM	Kevin Kneupper 163.00 USD
11/08/2023	Prepare 3rd Amended Notice of Deposition of Kathryn Martorano; correspond with Huseby Court Reporters regarding Depositions in November; review all deposition Notices and update calendar. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 3:00PM - 3:48PM	Suzy Garcia 108.00 USD
11/08/2023	Prepare and serve Plaintiff's 4th Amended Initial Disclosures. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:11PM - 5:29PM	Suzy Garcia 40.50 USD
11/08/2023	Review materials for M. Martorano deposition and prepare modular outline. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:48 5:46PM - 10:34PM	Kevin Kneupper 3,912.00 USD
11/08/2023	Draft updated initial disclosures and message S. Garcia regarding service. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:20PM - 8:32PM	Kevin Kneupper 163.00 USD
11/09/2023	Prepare documents for discussion w S Baker (expert) La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 8:25AM - 10:19AM	Cyclone Covey 1,548.50 USD
11/09/2023	Prepare documents for discussion w S Baker (expert) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:42AM - 10:48AM	Cyclone Covey 81.50 USD
11/09/2023	Prepare documents for discussion w S Baker (expert) La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 10:42AM - 12:24PM	Cyclone Covey 1,385.50 USD
11/09/2023	Review outline of K Martoranow w K Kneupper, review additional lines of questioning and add relevant documents, revise and rework outline La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 12:39PM - 3:03PM	Cyclone Covey 1,956.00 USD
11/09/2023	Review FAC for additional URLs relating to Konnektive to authenticate with Archive.Org. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:28PM - 5:46PM	Kevin Kneupper 244.50 USD
11/09/2023	Contact IRS regarding records request for K. Martorano tax litigation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 10:34PM - 11:04PM	Kevin Kneupper 407.50 USD
11/09/2023	Conference with C. Covey regarding K. Martorano deposition outline; collect additional materials during conference and discuss. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 11:04PM - 1:46AM ⁺¹	Kevin Kneupper 2,200.50 USD
11/10/2023	Prepare for M Martorano deposition, review videos and document archive La Pura - Tan v Quickbox [LTAN-CA-200128]	7:42 8:05AM - 3:47PM	Cyclone Covey 6,275.50 USD
11/12/2023	Review M. Martorano podcast and message C. Covey regarding key quotes. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:31PM - 3:01PM	Kevin Kneupper 407.50 USD
11/13/2023	Additional prep of M Martorano deposition, K Martorano deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	2:12 9:53AM - 12:05PM	Cyclone Covey 1,793.00 USD

11/13/2023	Conference call with Hyseby Court Reporters regarding Depositions scheduled for this week; review correspondences from Huseby Court Reporters regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:31PM - 1:01PM	Suzy Garcia 67.50 USD
11/13/2023	Conference call with Hyseby Court Reporters regarding Depositions scheduled for this week; review correspondences from Huseby Court Reporters regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:07PM - 2:19PM	Suzy Garcia 27.00 USD
11/13/2023	Draft outline modules for J. Martorano deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:54 5:28PM - 8:22PM	Kevin Kneupper 2,363.50 USD
11/14/2023	Final prep and conducting Kathryn Martorano deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	7:42 8:30AM - 4:12PM	Cyclone Covey 6,275.50 USD
11/14/2023	Attend deposition of K. Martorano and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	8:18 9:10AM - 5:28PM	Kevin Kneupper 6,764.50 USD
11/14/2023	Preparation for Jacob Martorano deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 5:10PM - 6:46PM	Cyclone Covey 1,304.00 USD
11/14/2023	Emails to opposing counsel RE: email to court, scheduling depositions; discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:44PM - 7:08PM	Cyclone Covey 326.00 USD
11/15/2023	Conference with C. Covey regarding preparation for M. Martorano deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 3:52AM - 5:10AM	Kevin Kneupper 1,059.50 USD
11/15/2023	Jacob Martorano and partial 30b6 deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	7:42 8:35AM - 4:17PM	Cyclone Covey 6,275.50 USD
11/15/2023	Prepare for Matt Martorano deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 8:15PM - 10:15PM	Cyclone Covey 1,630.00 USD
11/15/2023	Attend J. Martorano and 30(b)(6) depositions and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:00 8:28PM - 3:28AM ⁺¹	Kevin Kneupper 5,705.00 USD
11/16/2023	Matt Martorano Deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	10:00 8:33AM - 6:33PM	Cyclone Covey 8,150.00 USD
11/16/2023	Attend deposition of M. Martorano and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:12 1:44PM - 7:56PM	Kevin Kneupper 5,053.00 USD
11/16/2023	Prepare for Konnektive corporate deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 8:13PM - 9:49PM	Cyclone Covey 1,304.00 USD
11/17/2023	Konnektive 30b6 deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	9:06 7:15AM - 4:21PM	Cyclone Covey 7,416.50 USD
11/17/2023	Attend 30(b)(6) depositions and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:24 8:50PM - 12:14AM ⁺¹	Kevin Kneupper 2,771.00 USD

11/19/2023	Research case law relating to sanctions motion regarding deposition misconduct. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 12:20AM - 1:26AM	Kevin Kneupper 896.50 USD
11/20/2023	E-mail C. Queally regarding subpoena productions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:05PM - 1:11PM	Kevin Kneupper 81.50 USD
11/25/2023	E-mail C. Queally regarding sanctions motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:10PM - 2:28PM	Kevin Kneupper 244.50 USD
11/27/2023	Draft RFA to Konnektive authenticate documents not authenticated in the deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 12:08PM - 12:50PM	Cyclone Covey 570.50 USD
11/27/2023	Review correspondence from abc Legal regarding status on service of Deposition Subpoena to Mr. Publiese. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:25PM - 12:37PM	Suzy Garcia 27.00 USD
11/27/2023	E-mail C. Queally regarding sanctions motion meet and confer. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:16PM - 3:22PM	Kevin Kneupper 81.50 USD
11/27/2023	Conference with C. Covey regarding interrogatories to Konnektive Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:22PM - 3:46PM	Kevin Kneupper 326.00 USD
11/27/2023	Discuss potential interrogatories to serve on Konnektive defendants w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:08PM - 5:26PM	Cyclone Covey 244.50 USD
11/27/2023	Call w potential damages expert, email follow up RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:26PM - 5:38PM	Cyclone Covey 163.00 USD
11/28/2023	Conference call with C. Covey regarding Deposition videos and transcripts; correspond with Legal Express and Huseby Court Reporters regarding obtaining copies of all taken Depositions; update case file regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:00PM - 12:30PM	Suzy Garcia 67.50 USD
11/28/2023	Edit and revise interrogatories to send to Konnektive LLC La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:30PM - 1:06PM	Cyclone Covey 489.00 USD
11/28/2023	Prepare Interrogatories (Set 3) and Requests for Admission (Set 1) to the Konnektive Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 7:00PM - 8:00PM	Suzy Garcia 135.00 USD
11/28/2023	Meet and confer with C. Queally and C. Covey. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 7:25PM - 8:07PM	Kevin Kneupper 570.50 USD
11/28/2023	Review draft RFA's to Konnektive Defendants and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:07PM - 8:13PM	Kevin Kneupper 81.50 USD
11/29/2023	Serve Plaintiff's Requests for Admission (Set 1) and Interrogatories (Set 1) on Konnektive Defendants, update case file, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 12:07PM - 1:01PM	Suzy Garcia 121.50 USD

11/29/2023	Status conference with Court, follow up email to Konnektive counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 3:59PM - 4:35PM	Cyclone Covey 489.00 USD
11/30/2023	Prepare for update call with S Baker (expert) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 8:11AM - 8:41AM	Cyclone Covey 407.50 USD
11/30/2023	Email to Konnektive counsel RE: upcoming meet and confer, send invite RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:23AM - 9:29AM	Cyclone Covey 81.50 USD
11/30/2023	Call w S Baker re: evidence and documents he needs to review La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 10:30AM - 11:18AM	Cyclone Covey 652.00 USD
11/30/2023	Correspond with Huseby Court Reporters regarding status of Deposition Transcript of Mathew Martorano; review Document Subpoena to Scale Operations Management, update case file and calendar all related deadlines; follow up regarding missing Deposition Videos and Transcripts. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:21PM - 12:57PM	Suzy Garcia 81.00 USD
11/30/2023	Initial draft of proposed discovery dispute emails to send to Court, message to K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:47PM - 5:05PM	Cyclone Covey 244.50 USD
11/30/2023	Review productions in response to Konnektive subpoenas. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 8:55PM - 10:13PM	Kevin Kneupper 1,059.50 USD
11/30/2023	Review motion to extend page limits and e-mail C. Queally regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:13PM - 10:19PM	Kevin Kneupper 81.50 USD
12/01/2023	Correspond with Huseby regarding video files for the Deposition of Mathew Martorano; review files regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:38AM - 11:56AM	Suzy Garcia 40.50 USD
12/01/2023	Correspond with Huseby regarding video files for the Deposition of Mathew Martorano; review files regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:55PM - 3:25PM	Suzy Garcia 67.50 USD
12/04/2023	Discuss discovery dates w K Kneupper, discuss proposed email language for discovery disputes w K Kneupper, email same to Konnektive counsel, meet and confer with Konnektive counsel on same issues, follow up email to Konnektive counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 1:40PM - 2:28PM	Cyclone Covey 652.00 USD
12/04/2023	Conference with C. Queally regarding case deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:12PM - 7:30PM	Kevin Kneupper 244.50 USD
12/04/2023	Draft response to K. Martorano MSJ. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:54 8:42PM - 11:36PM	Kevin Kneupper 2,363.50 USD
12/05/2023	Review and save production of Konnektive websites from archive.org La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:22AM - 8:34AM	Cyclone Covey 163.00 USD
12/05/2023	Review court order and email to Konnektive counsel RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:34AM - 8:40AM	Cyclone Covey 81.50 USD

12/05/2023	Emails to 10 La Pua victims La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:04AM - 9:16AM	Cyclone Covey 163.00 USD
12/05/2023	Produce archive.org production to Konnektive La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:22PM - 12:28PM	Cyclone Covey 81.50 USD
12/05/2023	Review court order re: supplement to class certification and Konnektive response; conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:24PM - 8:42PM	Kevin Kneupper 244.50 USD
12/05/2023	Message C. Covey regarding deposition proposal from C. Queally. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:36PM - 11:42PM	Kevin Kneupper 81.50 USD
12/06/2023	Draft response to K. Martorano MSJ. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:42 8:16AM - 1:58PM	Kevin Kneupper 4,645.50 USD
12/06/2023	Emails to opposing counsel on discovery issues and stipulations on testimony La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:24PM - 12:36PM	Cyclone Covey 163.00 USD
12/07/2023	Draft response to K. Martorano MSJ. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:00 5:16AM - 8:16AM	Kevin Kneupper 2,445.00 USD
12/07/2023	Respond to emails from opposing counsel RE: various discovery issues La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:48PM - 1:00PM	Cyclone Covey 163.00 USD
12/08/2023	Review Judge Lopez's Chamber Rules; prepare Chart of Dispute/Undisputed Facts. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 12:20AM - 1:20AM	Suzy Garcia 135.00 USD
12/08/2023	Prepare Supplemental Motion for Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:30AM - 1:48AM	Suzy Garcia 40.50 USD
12/08/2023	Review transcripts to select parts of transcript to designate La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 8:21AM - 9:27AM	Cyclone Covey 896.50 USD
12/08/2023	File Supplemental Motion for Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:41PM - 2:05PM	Suzy Garcia 54.00 USD
12/08/2023	Draft response to K. Martorano MSJ and prepare for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	10:54 6:22PM - 5:16AM ⁺¹	Kevin Kneupper 8,883.50 USD
12/08/2023	Review Order regarding Plaintiff's Supplemental Motion In Support of Class Certification and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:00PM - 7:06PM	Suzy Garcia 13.50 USD
12/08/2023	Review Judge Lopez's Chamber Rules; prepare Chart of Dispute/Undisputed Facts; and file Opposition to Kathryn Martorano's Motion for Summary Judgment. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 7:27PM - 8:33PM	Suzy Garcia 148.50 USD

12/08/2023	Review Judge Lopez's Chamber Rules; prepare Chart of Dispute/Undisputed Facts; and file Opposition to Kathryn Martorano's Motion for Summary Judgment. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:24 9:15PM - 4:39AM ⁺¹	Suzy Garcia 999.00 USD
12/10/2023	Conference with C. Covey regarding sanctions motion and select example quotes for draft e-mail to court. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:58PM - 6:22PM	Kevin Kneupper 326.00 USD
12/11/2023	Email opposing counsel transcript designations for discovery dispute email to send to the Court La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:15AM - 8:21AM	Cyclone Covey 81.50 USD
12/11/2023	Send PO to damages expert to execute La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:27AM - 9:39AM	Cyclone Covey 163.00 USD
12/11/2023	Send Merrifield (expert) signed PO to other parties La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:39AM - 9:45AM	Cyclone Covey 81.50 USD
12/11/2023	Review, update case file, and calendar with all related deadlines regarding Objections from Third Party National Association regarding Doc Subpoena, correspondences from Huseby Court Reporters regarding past due invoices, and Deposition Subpoena to Angdrew Ukpabi. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:20PM - 3:44PM	Suzy Garcia 54.00 USD
12/11/2023	Call w expert about next steps for his report La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:00PM - 4:30PM	Cyclone Covey 407.50 USD
12/11/2023	Finalize and send discovery dispute email to court La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:29PM - 9:41PM	Cyclone Covey 163.00 USD
12/12/2023	Select key provisions of deposition transcripts, edit, and send same with email to court for upcoming discovery conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:06AM - 2:30AM	Cyclone Covey 326.00 USD
12/12/2023	Call with opposing counsel on process for depositions of class members La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:31PM - 2:49PM	Cyclone Covey 244.50 USD
12/12/2023	Conference with C. Queally and C. Covey regarding class member witness deposition stipulation issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:45PM - 6:03PM	Kevin Kneupper 244.50 USD
12/13/2023	Call w S Baker (expert) La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:53PM - 3:17PM	Cyclone Covey 326.00 USD
12/13/2023	Exchange emails with Court and opposing counsel RE: proposed schedule for remaining items before trial La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:07PM - 8:25PM	Cyclone Covey 244.50 USD
12/14/2023	Search for potential deepfake experts La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 9:20AM - 9:56AM	Cyclone Covey 489.00 USD
12/14/2023	Emails to potential deepfake experts La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:51AM - 9:57AM	Cyclone Covey 81.50 USD

12/15/2023	Call w potential video authentication expert La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:30AM - 9:42AM	Cyclone Covey 163.00 USD
12/15/2023	Call w potential video deepfake expert La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:00PM - 2:18PM	Cyclone Covey 244.50 USD
12/18/2023	Reply to opposing counsel RE: stipulations of forgeries La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:09AM - 8:21AM	Cyclone Covey 163.00 USD
12/18/2023	Call w court on discovery issues La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:54PM - 1:24PM	Cyclone Covey 407.50 USD
12/18/2023	Letter agreement to Dr. Groh, finalize PO for Dr. Groh, email to opposing parties RE: Groh designation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:36PM - 2:00PM	Cyclone Covey 326.00 USD
12/18/2023	Attend hearing on discovery issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:58PM - 4:16PM	Kevin Kneupper 244.50 USD
12/19/2023	Call w potential video deepfake expert La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 2:00PM - 2:18PM	Cyclone Covey 244.50 USD
12/20/2023	Review ECF Filings and Case Docket, update case file, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 11:58AM - 12:40PM	Suzy Garcia 94.50 USD
12/20/2023	Draft reply brief on motion to supplement class certification motion and message S. Garcia regarding filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:10PM - 2:40PM	Kevin Kneupper 407.50 USD
12/21/2023	Prepare and file Reply ISO Supplemental Motion ISO Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:39PM - 4:57PM	Suzy Garcia 40.50 USD
12/22/2023	Draft responses to evidentiary objections for K. Martorano MSJ. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:54 2:32PM - 5:26PM	Kevin Kneupper 2,363.50 USD
12/26/2023	Compile spreadsheets to send damages expert and email to expert RE: documents to review and time to discuss La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:10AM - 10:22AM	Cyclone Covey 163.00 USD
12/26/2023	Email to S Baker (expert) re: deadline for report La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:22AM - 10:28AM	Cyclone Covey 81.50 USD
12/26/2023	Email to M Groh (expert) re: deadline for report La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:22AM - 10:28AM	Cyclone Covey 81.50 USD
12/26/2023	Draft responses to evidentiary objections on K. Martorano MSJ and message S. Garcia re: filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:00 5:26PM - 10:26PM	Kevin Kneupper 4,075.00 USD
12/27/2023	File Response to Objections to Plaintiff's Evidence In Opposition to Martorano's MSJ. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 1:44AM - 2:14AM	Suzy Garcia 67.50 USD

12/27/2023	Call w S Baker (expert) about questions concerning facts of case La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:30PM - 4:00PM	Cyclone Covey 407.50 USD
12/27/2023	Review Reply brief filed by Konnektive ISO its MSJ for Kathryn Martorano La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 4:39PM - 5:15PM	Cyclone Covey 489.00 USD
12/28/2023	Follow up emails to opposing counsel on stipulation on 30b6 topics and production of RMG notes with customer id field La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:29AM - 9:41AM	Cyclone Covey 163.00 USD
12/28/2023	Correspond with Huseby Court Reporters regarding transcription audio and video exhibits for the Martorano's deposition in November 2023. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 1:50PM - 2:32PM	Suzy Garcia 94.50 USD
12/28/2023	Bates stamp and produce additional documents to opposing counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:11PM - 4:29PM	Cyclone Covey 244.50 USD
12/29/2023	Serve Plaintiff's First Amended Responses to Konnektive Defendants' Interrogatories (Set 3). La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 1:35PM - 2:35PM	Suzy Garcia 135.00 USD
01/05/2024	Correspond with Lauren Shaw from Huseby regarding transcribing Deposition Transcript and Exhibits for the Martorano Depositions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:26PM - 1:50PM	Suzy Garcia 54.00 USD
01/05/2024	Review Notices of Deposition of P.Ngo and A. Ukpabi and calendar all related deadlines; review Second Scheduling Order, Orders regarding Defendants' Incorrectly filed Documents, Order regarding Discovery Conference 12-18-23 and calendar all related deadlines; review case docket and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 9:06PM - 10:24PM	Suzy Garcia 175.50 USD
01/06/2024	Draft sanctions motion re: depositions. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:18 11:49PM - 4:07AM ⁺¹	Kevin Kneupper 3,504.50 USD
01/08/2024	Draft sanctions motion regarding deposition misconduct. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:18 5:25AM - 12:43PM	Kevin Kneupper 5,949.50 USD
01/08/2024	Review deposition excerpts for video expert to find key pieces related to video of Tyler Martorano, compile same and send to video expert La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 9:16AM - 9:58AM	Cyclone Covey 570.50 USD
01/08/2024	Review Deposition Video of Jacob Martorano re exact time in transcript where audio and video exhibits were played; correspond with Huseby regarding price to transcribe same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 12:00PM - 12:54PM	Suzy Garcia 121.50 USD
01/09/2024	Call w damages expert La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 11:00AM - 11:36AM	Cyclone Covey 489.00 USD
01/09/2024	Finalize Mann expert engagement agreement, send same to expert La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:01PM - 2:07PM	Cyclone Covey 81.50 USD

01/09/2024	Prepare and file Motion for Sanctions/Motion to Compel Further Testimony from Martorano Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 6:36PM - 7:18PM	Suzy Garcia 94.50 USD
01/09/2024	Review time reports and pull out all time for Martorano and Konnektive Depositions for sanctions motion, draft declaration ISO sanctions motion La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 7:24PM - 8:30PM	Cyclone Covey 896.50 USD
01/09/2024	Prepare and file Motion for Sanctions/Motion to Compel Further Testimony from Martorano Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 7:38PM - 8:08PM	Suzy Garcia 67.50 USD
01/09/2024	Prepare and file Motion for Sanctions/Motion to Compel Further Testimony from Martorano Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:00 8:37PM - 12:37AM ⁺¹	Suzy Garcia 540.00 USD
01/09/2024	Review expenses related to depositions, revise declaration La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 9:15PM - 9:57PM	Cyclone Covey 570.50 USD
01/09/2024	Draft motion for sanctions and prepare for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:24 11:45PM - 6:09AM ⁺¹	Kevin Kneupper 5,216.00 USD
01/10/2024	Prepare and file Motion for Sanctions/Motion to Compel Further Testimony from Martorano Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:32AM - 12:44AM	Suzy Garcia 27.00 USD
01/10/2024	Prepare and file Motion for Sanctions/Motion to Compel Further Testimony from Martorano Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:48 12:45AM - 4:33AM	Suzy Garcia 513.00 USD
01/10/2024	Conference call with C. Covey regarding Deposition Transcript of Matthew Martorano and transcribing the audio/video Exhibits; correspond with Huseby regarding same; review Deposition Video of Mr. Martorano and gather exact time in transcript where audio and video exhibits were played. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:55PM - 2:13PM	Suzy Garcia 40.50 USD
01/10/2024	Download and review all filings regarding Plaintiff's Motion for Sanctions for Improper Deposition Testimony, update case file, and prepare and send courtesy copies for Hon. Lopez; prepare Notice of Lodging Exhibit 1 and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 2:12PM - 3:18PM	Suzy Garcia 148.50 USD
01/10/2024	Download and review all filings regarding Plaintiff's Motion for Sanctions for Improper Deposition Testimony, update case file, and prepare and send courtesy copies for Hon. Lopez; prepare Notice of Lodging Exhibit 1 and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:29PM - 3:59PM	Suzy Garcia 67.50 USD
01/11/2024	Research CAFA issues relating to state AG e-mail and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 7:09PM - 9:15PM	Kevin Kneupper 1,711.50 USD
01/11/2024	E-mail D. Biderman regarding availability to speak to state AG's. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:15PM - 9:21PM	Kevin Kneupper 81.50 USD

01/12/2024	Review Defendants' Opposition to Motion for Class Certification, Order Granting Class Certification, and update case file; file Notice of Lodging Exhibit 1 to Declaration of K. Kneupper ISO Motion for Sanctions and correspond with NWL regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 12:21PM - 1:15PM	Suzy Garcia 121.50 USD
01/12/2024	Prepare and send correspondence to all parties with copy of Lodged Exhibit 1 to the Declaration of K. Kneupper ISO Plaintiff's Motion for Sanctions for Improper Deposition Conduct. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:47PM - 3:11PM	Suzy Garcia 54.00 USD
01/12/2024	Review class certification order and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:12PM - 8:30PM	Kevin Kneupper 244.50 USD
01/15/2024	Prepare for P. Ngo deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 1:14PM - 3:32PM	Kevin Kneupper 1,874.50 USD
01/16/2024	Travel to and attend P. Ngo nonappearance at deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 3:32PM - 4:26PM	Kevin Kneupper 733.50 USD
01/16/2024	Conference w K Kneupper RE: upcoming call with state AG's about Quick Box settlement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 9:09PM - 9:33PM	Cyclone Covey 326.00 USD
01/17/2024	Prepare and send courtesy copies of Plaintiff's Motion for Sanctions regarding Deposition Conduct, Redacted Exhibits, and Sealed Exhibits, to Hon. Linda Lopez. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 5:59PM - 6:41PM	Suzy Garcia 94.50 USD
01/18/2024	Call w QB Counsel (Perkins) RE: query from state AG La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:00AM - 11:18AM	Cyclone Covey 244.50 USD
01/18/2024	Call w S Baker (expert) RE: more information for report La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 11:37AM - 12:13PM	Cyclone Covey 489.00 USD
01/18/2024	Review all Invoices from Huseby and confirm w have received all transcripts and videos; correspond with billing regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:00PM - 4:30PM	Suzy Garcia 67.50 USD
01/18/2024	Conference with Quick Box counsel regarding CAFA inquiry from AG's. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:50PM - 5:02PM	Kevin Kneupper 163.00 USD
01/19/2024	Call w expert (Baker) about status of report La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 1:58PM - 3:04PM	Cyclone Covey 896.50 USD
01/19/2024	Review response to motion for sanctions and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 7:53PM - 8:17PM	Kevin Kneupper 326.00 USD
01/19/2024	Conference with S. Baker regarding expert report. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 8:17PM - 9:11PM	Kevin Kneupper 733.50 USD
01/22/2024	Call w S Baker RE: load balancing details La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:41PM - 4:11PM	Cyclone Covey 407.50 USD

01/23/2024	Review declaration on Konnektive financial condition and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:19AM - 1:43AM	Kevin Kneupper 326.00 USD
01/23/2024	Research Hon. Linda Lopez's trial calendar and correspond with Clerk of SD of CA regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 6:00PM - 7:00PM	Suzy Garcia 135.00 USD
01/24/2024	Review and reply to email from Hon. Lopez's chambers regarding courtesy copies of Motion for Sanctions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:10PM - 3:28PM	Suzy Garcia 40.50 USD
01/24/2024	Review Document Subpoena to Total System Services, Inc. and Notice of Deposition of PMK of National Merchants, update case file and calendar all related deadlines; review correspondences from Heseby regarding pending invoices; review Notice of Joinder, Konnektive's Opp to Motion for Sanctions, Defendants' Responses to Plaintiff's Interrogatories (Set 3) and Requests for Admission (Set 1), update case file and calendar any related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 4:41PM - 5:35PM	Suzy Garcia 121.50 USD
01/25/2024	Update Trello Card list with dates for Document Subpoena to Total System Services, Inc. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:54PM - 1:00PM	Suzy Garcia 13.50 USD
01/25/2024	Brief chat w S Baker (expert) about report status La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:17PM - 4:23PM	Cyclone Covey 81.50 USD
01/26/2024	Prepare and send correspondence to Kerrie Merrifield regarding First Amended Complaint and Declaration of T. Knuth In Support of Opposition to Motion for Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:48PM - 4:00PM	Suzy Garcia 27.00 USD
01/26/2024	Attend call with state attorney generals regarding proposed settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 4:50PM - 5:44PM	Kevin Kneupper 733.50 USD
01/28/2024	Research potential pre-judgment fraudulent transfer claim. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 5:44PM - 7:26PM	Kevin Kneupper 1,385.50 USD
01/29/2024	Review email regarding extend time for expert reply from opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:47PM - 1:53PM	Cyclone Covey 81.50 USD
01/30/2024	Review Baker expert report draft La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 2:17PM - 2:59PM	Cyclone Covey 570.50 USD
01/31/2024	Draft fraudulent transfer complaint. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:22PM - 2:52PM	Kevin Kneupper 407.50 USD
01/31/2024	Serve Plaintiff's 5th Amended Initial Disclosures on all parties via email and regular mail. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 4:05PM - 4:47PM	Suzy Garcia 94.50 USD
02/01/2024	Email to deepfake expert La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:40AM - 10:46AM	Cyclone Covey 81.50 USD
02/01/2024	Email 20 victims of La Pura looking for additional witnesses La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:14PM - 5:32PM	Cyclone Covey 244.50 USD

02/02/2024	Call w La Pura victim about testifying La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 1:49PM - 2:01PM	Cyclone Covey 163.00 USD
02/02/2024	Call w damages expert about excel spreadsheet, email to expert RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:42PM - 2:48PM	Cyclone Covey 81.50 USD
02/02/2024	Call w Baker (expert) on report deadlines La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:53PM - 4:59PM	Cyclone Covey 81.50 USD
02/02/2024	Email multiple victims of La Pura to find witness for deposition testimony La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:32PM - 5:44PM	Cyclone Covey 163.00 USD
02/03/2024	Fix spreadsheet for damages expert to remove excess empty rows consuming memory La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 7:01PM - 7:31PM	Cyclone Covey 407.50 USD
02/05/2024	Review applicable 9th Circuit law on expert explanation of criminal activity and structure La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:30AM - 9:48AM	Cyclone Covey 244.50 USD
02/05/2024	Review settlement, claim forms, proposed class notices, and emails from AG; review expenses incurred to date in case, draft proposed language to modify class notice and send same to K Kneupper for review and comment La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 9:47AM - 10:41AM	Cyclone Covey 733.50 USD
02/05/2024	Call w damages expert La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:00PM - 12:12PM	Cyclone Covey 163.00 USD
02/05/2024	Meet and confer w Konnektive counsel on expert rebuttal timing and outstanding discovery issues La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:12PM - 12:24PM	Cyclone Covey 163.00 USD
02/05/2024	Call (VM) to victim of La Pura to discuss potential deposition and follow up email La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:57PM - 5:03PM	Cyclone Covey 81.50 USD
02/05/2024	Call to different victim of La Pura to discuss potential deposition and follow up email La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:28PM - 6:40PM	Cyclone Covey 163.00 USD
02/05/2024	Conference with C. Queally regarding expert deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:14PM - 9:26PM	Kevin Kneupper 163.00 USD
02/05/2024	E-mail opposing counsel regarding third party subpoena productions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:26PM - 9:32PM	Kevin Kneupper 81.50 USD
02/06/2024	Email La Pura victim to set up call La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:33AM - 9:39AM	Cyclone Covey 81.50 USD
02/06/2024	DRaft stipulation on forgery of Konnektive contracts produced by Mastercard La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:28PM - 12:40PM	Cyclone Covey 163.00 USD

02/06/2024	Investigate Konnektive expert witnesses. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 3:06PM - 4:30PM	Kevin Kneupper 1,141.00 USD
02/06/2024	E-mail C. Queally regarding expert deadline extension. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:17PM - 10:23PM	Kevin Kneupper 81.50 USD
02/07/2024	Call w Konnektive RE: production of notes and tying notes to customer ID La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:56PM - 1:02PM	Cyclone Covey 81.50 USD
02/07/2024	Call w La Pura victim La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:03PM - 7:21PM	Cyclone Covey 244.50 USD
02/07/2024	Discuss request for page limit increase on MSJ w K Kneupper and email RE: same to opposing counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:21PM - 7:27PM	Cyclone Covey 81.50 USD
02/07/2024	Review email of new spreadsheet produced by opposing counsel and email to opposing counsel RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:27PM - 7:39PM	Cyclone Covey 163.00 USD
02/08/2024	Draft motion to modify claim form La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 7:39PM - 8:15PM	Cyclone Covey 489.00 USD
02/09/2024	Search for address for B Walker (Witness), assign subpoena task to S Garcia and discuss same with her, discuss depo priority list with K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:59PM - 2:23PM	Cyclone Covey 326.00 USD
02/09/2024	Several conference calls with Court Reporting Agencies in Prairie View IL; set up Deposition reservations for Depositions of Brett Walker and Class member. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 3:13PM - 4:01PM	Suzy Garcia 108.00 USD
02/09/2024	Several conference calls with Court Reporting Agencies in Prairie View IL; prepare Deposition Notices and Subpoenas for Class Member and Brett Walker; set up Deposition reservations for Depositions of Brett Walker and Class member. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 4:48PM - 5:30PM	Suzy Garcia 94.50 USD
02/09/2024	Several conference calls with Court Reporting Agencies in Prairie View IL; prepare Deposition Notices and Subpoenas for Class Member and Brett Walker; set up Deposition reservations for Depositions of Brett Walker and Class member. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 6:10PM - 7:28PM	Suzy Garcia 175.50 USD
02/12/2024	Review subpoenas for service on witnesses for depositions (Walker and B Kackson), discuss changes RE: same w S Garcia La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:53PM - 5:05PM	Cyclone Covey 163.00 USD
02/12/2024	Call w potential witness (Victim) of La Pura La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:05PM - 5:23PM	Cyclone Covey 244.50 USD
02/12/2024	Revise Deposition Subpoenas and Deposition Notices to Bernita Jackson and Brett Walker; correspond with Court Reporting Agencies to confirm reservation of Court Reporters and Videographers. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 5:06PM - 6:12PM	Suzy Garcia 148.50 USD

02/12/2024	Revise Deposition Subpoenas and Deposition Notices to Bernita Jackson and Brett Walker; correspond with Court Reporting Agencies to confirm reservation of Court Reporters and Videographers. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 9:52PM - 10:34PM	Suzy Garcia 94.50 USD
02/13/2024	Prepare and file Motion to Modify Preliminary Approval of Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:00PM - 3:24PM	Suzy Garcia 54.00 USD
02/13/2024	Prepare and file Motion to Modify Preliminary Approval of Class Certification. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 4:20PM - 5:02PM	Suzy Garcia 94.50 USD
02/13/2024	Emails to witness B Walker RE: subpoena La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 6:37PM - 6:43PM	Cyclone Covey 81.50 USD
02/13/2024	Call w La Pura victim about possible testimony La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:43PM - 6:55PM	Cyclone Covey 163.00 USD
02/14/2024	Prepare and file Motion to Modify Preliminary Approval of Class Certification; La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:30PM - 12:48PM	Suzy Garcia 40.50 USD
02/14/2024	Prepare and file Motion to Modify Preliminary Approval of Class Certification; review Orders re Denying Plaintiff's Motion to file Documents Under Seal ISO Opposition to Defendant K. Martorano's Motion for Summary Judgment and Extending Page Limit for Konnektive's Joint MSJ; calendar all related deadlines regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:05PM - 1:23PM	Suzy Garcia 40.50 USD
02/14/2024	Call w witness B Walker about deposition logistics La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:14PM - 1:20PM	Cyclone Covey 81.50 USD
02/14/2024	Review correspondences from Court Reporting Agencies regarding Deposition Reservations for Brett Walker and Bernita Jackson and update calendar. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:21PM - 1:45PM	Suzy Garcia 54.00 USD
02/14/2024	Review Konnektive's Notice of Deposition of Third-Party Global E-Trading, LLC and calendar all related deadlines; review served Amended Disclosures and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:42PM - 2:06PM	Suzy Garcia 54.00 USD
02/14/2024	E-mail C. Queally regarding document productions by third parties. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:27PM - 3:33PM	Kevin Kneupper 81.50 USD
02/14/2024	Conference with C. Covey regarding assignments for upcoming depositions. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:33PM - 3:45PM	Kevin Kneupper 163.00 USD
02/15/2024	Emails w opposing counsel and witness to schedule depositions of third party witnesses, arrange travel for deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 11:25AM - 11:55AM	Cyclone Covey 407.50 USD
02/15/2024	Review Orders regarding MSJ and financial production deadlines and confirm calendar is correct. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:24PM - 12:36PM	Suzy Garcia 27.00 USD

02/16/2024	Prepare Amended Notice of Deposition Subpoena to Brett Walker, serve and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 2:02PM - 2:44PM	Suzy Garcia 94.50 USD
02/16/2024	Call w deepfake expert about report La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:46PM - 3:16PM	Cyclone Covey 407.50 USD
02/17/2024	Research VISA testimony regarding load balancing notice. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 4:26PM - 5:38PM	Kevin Kneupper 978.00 USD
02/18/2024	Review M. Groh expert report and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:38PM - 6:02PM	Kevin Kneupper 326.00 USD
02/20/2024	Review motion to extend deadlines for reply experts and approve same, email opposing counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:45PM - 7:51PM	Cyclone Covey 81.50 USD
02/21/2024	Review and respond to opposing counsel on CodeClouds deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:39AM - 7:45AM	Cyclone Covey 81.50 USD
02/21/2024	Review documents for filing per docket 399. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:42PM - 5:54PM	Kevin Kneupper 163.00 USD
02/21/2024	Prepare unsealed versions of Plaintiff's Opposition to Martorano's Motion for Summary Judgment, Exhibit, and Response to Statement of Facts (per Order Dkt. No. 399). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:46PM - 6:10PM	Suzy Garcia 54.00 USD
02/21/2024	Review Konnektive motion for summary judgment and research re: same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 5:54PM - 7:30PM	Kevin Kneupper 1,304.00 USD
02/21/2024	Prepare unsealed versions of Plaintiff's Opposition to Martorano's Motion for Summary Judgment, Exhibit, and Response to Statement of Facts (per Order Dkt. No. 399). La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:09PM - 6:27PM	Suzy Garcia 40.50 USD
02/21/2024	Conference with C. Covey regarding deposition deadlines and expert reports. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:38PM - 6:56PM	Kevin Kneupper 244.50 USD
02/21/2024	E-mail C. Queally regarding extension of time to respond to motion for summary judgment. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:30PM - 7:36PM	Kevin Kneupper 81.50 USD
02/21/2024	Review scheduling emails from opposing counsel, create spreadsheet of emails, reply to opposing counsel with dates, email S Baker (expert) to hold date La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:51PM - 8:09PM	Cyclone Covey 244.50 USD
02/22/2024	Review correspondences to and from opposing counsel regardign depositions scheduled for February and March, and calendar all related deadlines; review Deposition Subpoena to Midigator LLC; correspond with Lake Cook Reporting regarding Deposition of Bernita Jackson. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 12:15PM - 1:03PM	Suzy Garcia 108.00 USD

02/22/2024	Call w damages expert about analysis of Konnektive spreadsheets La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:00PM - 4:30PM	Cyclone Covey 407.50 USD
02/22/2024	Emails with opposing counsel scheduling upcoming depositions La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:00PM - 6:12PM	Cyclone Covey 163.00 USD
02/22/2024	Prepare Joint Stipulation to Extend Deadlines Regarding Konnektive Defendants' Motion for Summary Judgment; review Konnektive Defendants' Motion for Summary Motion and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 7:59PM - 9:05PM	Suzy Garcia 148.50 USD
02/23/2024	Revise Joint Stipulation to Extend Deadlines Regarding Konnektive Defendants' Motion for Summary Judgment. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:20PM - 1:38PM	Suzy Garcia 40.50 USD
02/23/2024	Review Sealed Lodged Proposed Document In Support of Konnektive Defendants' Motion for Summary Judgment, Pro Hac Vice Applications, Joint Motion regarding Expert Disclosure and Expert Discovery Deadlines; update case file and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 7:48PM - 8:36PM	Suzy Garcia 108.00 USD
02/25/2024	Review draft of S. Baker report and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:44PM - 6:02PM	Kevin Kneupper 244.50 USD
02/26/2024	Prepare for and conduct conference w S Baker to discuss final edits to expert report La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 10:24AM - 11:36AM	Cyclone Covey 978.00 USD
02/26/2024	Review draft motion to extend deadlines for summary judgment response and e-mail C. Queally regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:21PM - 2:27PM	Kevin Kneupper 81.50 USD
02/26/2024	Edit draft of motion to extend deadlines for MSJ response and e-mail C. Queally regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:45PM - 2:57PM	Kevin Kneupper 163.00 USD
02/26/2024	Call w witness (B Jackson) to coordinate logistics for deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:07PM - 3:13PM	Cyclone Covey 81.50 USD
02/26/2024	Call w opposing counsel to coordinate CodeClouds deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:13PM - 3:19PM	Cyclone Covey 81.50 USD
02/27/2024	Call w damages expert La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:37AM - 11:55AM	Cyclone Covey 244.50 USD
02/27/2024	Prepare Proposed Order Granting Parties' Joint Stipulation Regarding Response Deadline to Moving Konnektive Defendants' Motion for Summary Judgment and correspond with K. Kneupper regarding same; file same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:58PM - 1:28PM	Suzy Garcia 67.50 USD
02/27/2024	Review draft proposed order on motion to reset summary judgment hearing and message S. Garcia regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:49PM - 1:55PM	Kevin Kneupper 81.50 USD

02/27/2024	Prepare and file Proposed Order Granting Parties' Joint Stipulation Regarding Response Deadline to Moving Konnektive Defendants' Motion for Summary Judgment and correspond with K. Kneupper regarding same; review case docket and deadlines; update case file and revise case calendar. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 2:11PM - 3:17PM	Suzy Garcia 148.50 USD
02/27/2024	Conference call with Lake Cook Reporting, in preparation for the Deposition of Bernita Jackson; review Second Amended Notice of Deposition of Third-Party Long Tail Corporation and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:18PM - 3:42PM	Suzy Garcia 54.00 USD
02/28/2024	B Jackson Deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 11:38AM - 1:38PM	Cyclone Covey 1,630.00 USD
02/28/2024	Call w Baker (expert) about exhibit references La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:13PM - 3:19PM	Cyclone Covey 81.50 USD
02/28/2024	Review Merrifield Expert Report, call to Ms. Merrifield, review revised report La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 4:32PM - 5:08PM	Cyclone Covey 489.00 USD
03/01/2024	Schedule send expert reports to opposing counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:26AM - 12:32AM	Cyclone Covey 81.50 USD
03/01/2024	Correspond with Sprint Process Servers regarding charges for the service of the Deposition Subpoena to Bret Walkr. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:50PM - 1:02PM	Suzy Garcia 27.00 USD
03/01/2024	Correspond with WSG Reporting regarding change of time for the Deposition of Bret Walker, update calendar regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:48PM - 2:12PM	Suzy Garcia 54.00 USD
03/01/2024	Correspond with Huseby Court Reporters regarding copy of Video for the Deposition of Nick Carroll; update file regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 3:06PM - 4:48PM	Suzy Garcia 229.50 USD
03/04/2024	Review Killingsworth report and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 5:44AM - 6:50AM	Kevin Kneupper 896.50 USD
03/04/2024	Review Mott expert report. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 6:50AM - 7:32AM	Kevin Kneupper 570.50 USD
03/04/2024	Prep for Walker deposition, set up and conduct Walker Deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	3:12 10:30AM - 1:42PM	Cyclone Covey 2,608.00 USD
03/04/2024	Attend deposition of B. Walker and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 1:26PM - 2:56PM	Kevin Kneupper 1,222.50 USD
03/04/2024	Review email from opposing counsel RE: expert disclosures, email experts, discuss same w K Kneupper, compile and send initial response to opposing counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:48PM - 11:12PM	Cyclone Covey 326.00 USD

03/05/2024	CodeClouds Depo prep including review of CodeClouds document production and assembling exhibits for the deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 7:45AM - 9:33AM	Cyclone Covey 1,467.00 USD
03/05/2024	CodeClouds Depo prep including review of CodeClouds document production and assembling exhibits for the deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 3:52PM - 6:34PM	Cyclone Covey 2,200.50 USD
03/05/2024	Review emails regarding Expert Witnesses and update Expert file with all served documents. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 7:49PM - 8:37PM	Suzy Garcia 108.00 USD
03/05/2024	Review Order Granting Joint Stipulation to Continue Deadlines to Konnektive Defendants' Motion for Summary Judgment and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:43PM - 8:49PM	Suzy Garcia 13.50 USD
03/06/2024	Conference call with Sandra Avants from GRSM Firm regarding accessing Expert Files; review and update Defendants documents produced for Experts Steven Mott and Kevin Killingsworth. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 1:45PM - 2:45PM	Suzy Garcia 135.00 USD
03/06/2024	Prep for CodeClouds deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 7:16PM - 8:16PM	Cyclone Covey 815.00 USD
03/07/2024	Attend deposition of CodeClouds. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:48 9:01AM - 12:49PM	Kevin Kneupper 3,097.00 USD
03/07/2024	Final preparation and attend CodeCloud deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	4:00 5:31PM - 9:31PM	Cyclone Covey 3,260.00 USD
03/07/2024	Planning call w K Kneupper to review upcoming deposition schedule and deadlines in case for mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:01PM - 10:13PM	Cyclone Covey 163.00 USD
03/07/2024	Email Ms. Tan RE: attending upcoming settlement conference La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:25PM - 10:31PM	Cyclone Covey 81.50 USD
03/07/2024	Email to court RE: attending upcoming conference via Zoom due to hearing conflict La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:31PM - 10:37PM	Cyclone Covey 81.50 USD
03/07/2024	Email to opposing counsel RE: stipulation on Konnektive's claims concerning forged contracts. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:37PM - 10:43PM	Cyclone Covey 81.50 USD
03/10/2024	Draft motion for summary judgment on affirmative defenses. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 6:11PM - 7:29PM	Kevin Kneupper 1,059.50 USD
03/11/2024	Assemble protective order documents for expert Mann and send for esigning, draft email notifying counsel of Mann's engagement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:57PM - 5:09PM	Cyclone Covey 163.00 USD
03/11/2024	Assemble documents to present to expert Mann and separate confidential and non confidential documents La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:09PM - 5:33PM	Cyclone Covey 326.00 USD

03/13/2024	Draft subpoenas to Konnektive experts and email same to opposing counsel for sub service La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 11:28AM - 12:04PM	Cyclone Covey 489.00 USD
03/13/2024	Review NMI subpoena and documents and send suggested questions and topics to K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:22PM - 12:40PM	Cyclone Covey 244.50 USD
03/13/2024	Review correspondence regarding Deposition of Kerrie Merrifield, Defendants' Requests for Pro Hac Vice, and Order regarding Mandatory Settlement Conference; update case file; calendar all related deadlines; review Hon. Leshner's Mandatory Settlement Conference Procedures. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 5:14PM - 6:02PM	Suzy Garcia 108.00 USD
03/13/2024	Review correspondence regarding Subpoenaed documents from Network Merchants; review and update case file regarding Deposition Video for J. Martorano and PMK Depositions; review Deposition Notice regarding Midigator LLC and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:58PM - 6:16PM	Suzy Garcia 40.50 USD
03/13/2024	Prepare for and attend NMI deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 7:47PM - 10:29PM	Kevin Kneupper 2,200.50 USD
03/13/2024	Draft motion for summary judgment on affirmative defenses. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 10:53PM - 1:29AM ⁺¹	Kevin Kneupper 2,119.00 USD
03/14/2024	Prepare for discussion w R Mann rebuttal expert La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 9:26AM - 10:38AM	Cyclone Covey 978.00 USD
03/14/2024	Call w R Mann expert La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 11:00AM - 11:42AM	Cyclone Covey 570.50 USD
03/14/2024	Defend Merrifield deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	4:06 12:26PM - 4:32PM	Cyclone Covey 3,341.50 USD
03/14/2024	Review document production received from Network Merchants LLC and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:45PM - 2:03PM	Suzy Garcia 40.50 USD
03/14/2024	Draft motion for summary judgment on affirmative defenses. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:48 2:37PM - 6:25PM	Kevin Kneupper 3,097.00 USD
03/14/2024	Review order on K. Martorano summary judgment and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 6:25PM - 6:55PM	Kevin Kneupper 407.50 USD
03/14/2024	Review Order Denying Kathryn Martorano's Motion for Summary Judgment and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 11:36PM - 12:06AM ⁺¹	Suzy Garcia 67.50 USD
03/15/2024	Prep session with Baker for his deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 2:02PM - 3:02PM	Cyclone Covey 815.00 USD
03/15/2024	Review subpoena to Baker from Konnektive and begin assembling documents La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 2:46PM - 3:40PM	Cyclone Covey 733.50 USD

03/15/2024	Correspond with Network Deposition Services regarding copy of Video and Transcript for the Deposition of David Press; review same and update case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:53PM - 3:23PM	Suzy Garcia 67.50 USD
03/15/2024	Emails to opposing counsel RE: expert discovery logistics La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:02PM - 3:08PM	Cyclone Covey 81.50 USD
03/18/2024	Review Visa executive testimony and highlight portions for R Mann to review La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 5:46PM - 6:22PM	Cyclone Covey 489.00 USD
03/18/2024	Emails w opposing counsel and expert to schedule deposition date, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:22PM - 6:34PM	Cyclone Covey 163.00 USD
03/18/2024	Begin assembling documents in response to Baker subpoena La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 6:34PM - 7:16PM	Cyclone Covey 570.50 USD
03/18/2024	Draft meet and confer e-mail to C. Queally regarding MSJ on affirmative defenses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 9:49PM - 10:13PM	Kevin Kneupper 326.00 USD
03/19/2024	Call w R Mann RE scheduling and documents La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:00AM - 10:24AM	Cyclone Covey 326.00 USD
03/20/2024	Review documents produced by Midigator and begin deposition preparation for Midigator deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	2:36 2:12PM - 4:48PM	Cyclone Covey 2,119.00 USD
03/20/2024	Continue reviewing and compiling documents in response to Baker subpoena, draft email to opposing counsel RE: production, first draft of privilege log for documents not to be produced La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 2:22PM - 3:16PM	Cyclone Covey 733.50 USD
03/20/2024	Meet and confer on motion for partial summary judgment with Konnektive Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 10:55PM - 11:25PM	Kevin Kneupper 407.50 USD
03/21/2024	Call w S Baker (expert), assemble documents and send to Baker, assemble documents sent as part of document production to Konnektive La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 4:59PM - 5:53PM	Cyclone Covey 733.50 USD
03/21/2024	Gather documents relating to Paul Paolucci and Mastercard. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 11:21PM - 11:45PM	Kevin Kneupper 326.00 USD
03/21/2024	Conference with C. Covey and S. Baker regarding expert report. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:45PM - 11:57PM	Kevin Kneupper 163.00 USD
03/22/2024	Prepare for Midigator deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 10:35AM - 11:29AM	Cyclone Covey 733.50 USD
03/22/2024	Attend Midigator deposition and research related issues for C. Covey. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:06 2:51PM - 9:57PM	Kevin Kneupper 5,786.50 USD

03/23/2024	Draft partial motion for summary judgment. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 11:15PM - 1:03AM ⁺¹	Kevin Kneupper 1,467.00 USD
03/25/2024	Review emails from Huseby regarding Transcript of the 36(b)(6) Deposition of Konnektive Vol. 2; conference call with Huseby regarding same; review and upload transcript to file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:01PM - 12:25PM	Suzy Garcia 54.00 USD
03/25/2024	Review emails from Huseby regarding Transcript of the 36(b)(6) Deposition of Konnektive Vol. 2; conference call with Huseby regarding same; review and upload transcript to file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:36PM - 12:48PM	Suzy Garcia 27.00 USD
03/25/2024	Review emails from Huseby regarding Transcript of the 36(b)(6) Deposition of Konnektive Vol. 2; conference call with Huseby regarding same; review and upload transcript to file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:43PM - 2:55PM	Suzy Garcia 27.00 USD
03/25/2024	Continue assembling documents in response to Bakjer subpoena La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 5:05PM - 6:17PM	Cyclone Covey 978.00 USD
03/26/2024	Draft and send document preservation letter to opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 1:03AM - 2:27AM	Kevin Kneupper 1,141.00 USD
03/26/2024	Finalize responses to Baker subpoena, finalize production and email same to opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 6:17PM - 7:23PM	Cyclone Covey 896.50 USD
03/27/2024	Review draft Mann expert report La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:27PM - 1:03PM	Cyclone Covey 489.00 USD
03/27/2024	Review R. Mann report and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:14PM - 1:38PM	Kevin Kneupper 326.00 USD
03/27/2024	Call w expert (Mann) RE edits to report La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:42PM - 2:54PM	Cyclone Covey 163.00 USD
03/28/2024	Review final Mann report, email Mann RE: same and upcoming deposition, assemble documents relied on by report, schedule email to send with final report La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 11:50AM - 12:14PM	Cyclone Covey 326.00 USD
03/28/2024	PR La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 12:03PM - 1:03PM	Suzy Garcia 135.00 USD
03/28/2024	Prep session w Baker expert for deposition tomorrow La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:34PM - 3:58PM	Cyclone Covey 326.00 USD
03/29/2024	Review email from opposing counsel RE: document subpoena for Mann and respond to same, email same to Mann La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:25AM - 8:37AM	Cyclone Covey 163.00 USD
03/29/2024	Review upcoming deposition schedule and assign task to subpoena and notice upcoming expert depositions La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:37AM - 8:49AM	Cyclone Covey 163.00 USD

03/29/2024	Prepare responses to Mann subpoena, assemble responsive documents and prepare same for production La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 9:51AM - 10:57AM	Cyclone Covey 896.50 USD
03/29/2024	Continue preparation for Killingsworth deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 10:55AM - 11:55AM	Cyclone Covey 815.00 USD
03/29/2024	Review testimony and reports provided by Mann add same to production in response to subpoena, emails to Mann RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:51AM - 12:03PM	Cyclone Covey 163.00 USD
03/29/2024	Defend Baker deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	4:48 12:25PM - 5:13PM	Cyclone Covey 3,912.00 USD
03/29/2024	Review emails to and from opposing counsel regarding Expert Depositions; review, calendar and update file with Document Subpoenas; prepare Notices of Deposition and Deposition Subpoenas of Experts Kevin Killingsworth, Steve Mott, Keith Lerner, and Bruce Strombom; reserve court reporters and videographers regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 1:07PM - 1:55PM	Suzy Garcia 108.00 USD
03/29/2024	Review emails to and from opposing counsel regarding Expert Depositions; review, calendar and update file with Document Subpoenas; prepare Notices of Deposition and Deposition Subpoenas of Experts Kevin Killingsworth, Steve Mott, Keith Lerner, and Bruce Strombom; reserve court reporters and videographers regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:54 1:51PM - 4:45PM	Suzy Garcia 391.50 USD
03/29/2024	Research Communications Decency Act issue and draft response to MSJ. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:54 4:43PM - 6:37PM	Kevin Kneupper 1,548.50 USD
03/29/2024	Prepare and serve Subpoenas to Produce Documents to Keith Lerner and Bruce Strombom. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 4:43PM - 5:49PM	Suzy Garcia 148.50 USD
03/30/2024	Draft Daubert motion on Konnektive experts. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:12 6:37PM - 11:49PM	Kevin Kneupper 4,238.00 USD
03/31/2024	Emails to opposing counsel and expert (Mann) re footnote 3 citation and providing relevant pages La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:55AM - 12:01PM	Cyclone Covey 81.50 USD
03/31/2024	Review Strombom report, add section of Daubert brief arguing that Strombom is not a proper rebuttal expert La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 3:47PM - 5:35PM	Cyclone Covey 1,467.00 USD
03/31/2024	Review excel files in Killingsworth report and Strombom, discuss same w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:34PM - 6:04PM	Cyclone Covey 407.50 USD
03/31/2024	Review Killingsworth spreadsheet production and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 9:19PM - 9:43PM	Kevin Kneupper 326.00 USD
04/01/2024	Prepare Professor Mann's document production. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 4:45PM - 5:45PM	Suzy Garcia 135.00 USD

04/01/2024	Draft e-mail to C. Queally regarding sanctions motion La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:43PM - 9:55PM	Kevin Kneupper 163.00 USD
04/01/2024	Conference with R. Mann regarding deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:55PM - 10:07PM	Kevin Kneupper 163.00 USD
04/01/2024	E-mail C. Queally regarding Zoom link for Mann deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:07PM - 10:13PM	Kevin Kneupper 81.50 USD
04/02/2024	Defend Mann deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:48 3:51AM - 8:39AM	Kevin Kneupper 3,912.00 USD
04/02/2024	Calendar all upcoming Expert Depositions and correspond with LitiCourt regarding reservation of Court Reporters and Videographers. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 12:25PM - 1:49PM	Suzy Garcia 189.00 USD
04/03/2024	Review and respond to Konnektive's request to meet and confer RE: Merrifield deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:20AM - 11:32AM	Cyclone Covey 163.00 USD
04/03/2024	Review correspondences regarding new dates for Depositions of Experts Lerner and Strombom; correspond with LitiCourt regarding same; update calendar. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:42PM - 1:06PM	Suzy Garcia 54.00 USD
04/04/2024	Prepare Amended Deposition Subpoenas and Deposition Notices regarding Experts Lerner and Strombom; correspond with LitiCourt regarding change in reservations for Court Reporters and Videographers regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 1:00PM - 1:54PM	Suzy Garcia 121.50 USD
04/05/2024	Prep session with K Kneupper on Learner, Strombom and Killingsworth depositions La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 5:25PM - 6:25PM	Cyclone Covey 815.00 USD
04/06/2024	Prep Strombom deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:14PM - 5:38PM	Cyclone Covey 326.00 USD
04/06/2024	Prep Strombom deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 7:35PM - 7:53PM	Cyclone Covey 244.50 USD
04/07/2024	Prep Strombom deposition, including detailed analysis of new spreadsheet produced by Konnektive showing purchases La Pura - Tan v Quickbox [LTAN-CA-200128]	6:24 11:59AM - 6:23PM	Cyclone Covey 5,216.00 USD
04/07/2024	Prepare for Lerner deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	9:18 7:44PM - 5:02AM ⁺¹	Kevin Kneupper 7,579.50 USD
04/08/2024	Continue analysis of RMG_5 spreadsheet La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 7:53AM - 9:05AM	Cyclone Covey 978.00 USD
04/08/2024	Killingsworth deposition prep La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 9:02AM - 10:44AM	Cyclone Covey 1,385.50 USD
04/08/2024	Attend Lerner deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	3:54 2:00PM - 5:54PM	Cyclone Covey 3,178.50 USD

04/08/2024	Prepare for and take Lerner deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:42 3:02PM - 7:44PM	Kevin Kneupper 3,830.50 USD
04/08/2024	Review Konnektive's email RE: Merrifield deposition and potential motion to compel, respond to same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:11PM - 3:29PM	Cyclone Covey 244.50 USD
04/08/2024	Meet and confer w opposing counsel on Merrifield depo and motion to exclude under Rule 37 La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:50PM - 6:02PM	Cyclone Covey 163.00 USD
04/09/2024	Attend Strombom deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:00 5:02AM - 8:02AM	Kevin Kneupper 2,445.00 USD
04/09/2024	Conduct Stombom deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	6:24 12:20PM - 6:44PM	Cyclone Covey 5,216.00 USD
04/10/2024	Correspond with LtiCourt regarding confirmation of Deposition of Expert Kevin Killingsworth; prepare and send correspondence to all parties with Zoom and AgileLaw links for the deposition of Mr. Killingsworth; update calendar regarding same; correspond with C. Covey in preparation for Deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 1:13PM - 1:49PM	Suzy Garcia 81.00 USD
04/10/2024	Correspond with LtiCourt regarding confirmation of Deposition of Expert Kevin Killingsworth; prepare and send correspondence to all parties with Zoom and AgileLaw links for the deposition of Mr. Killingsworth; update calendar regarding same; correspond with C. Covey in preparation for Deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:00PM - 3:18PM	Suzy Garcia 40.50 USD
04/10/2024	Call w Baker and review report RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:20PM - 6:38PM	Cyclone Covey 244.50 USD
04/10/2024	Emails w Merrifield and phone call to set new deposition time La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:38PM - 6:50PM	Cyclone Covey 163.00 USD
04/11/2024	Pull Video Excerpts from the Depositions of Mr. Reviea and Mr. Sistrunk. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:25AM - 2:49AM	Suzy Garcia 54.00 USD
04/11/2024	Final prep for Killingsworth deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 9:33AM - 11:51AM	Cyclone Covey 1,874.50 USD
04/11/2024	Conduct Killingsworth deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	6:12 11:55AM - 6:07PM	Cyclone Covey 5,053.00 USD
04/11/2024	Correspond with attorneys regarding preparation for Deposition of Steve Mott; prepare email to all parties regarding Zoom and AgileLaw links for the remote Deposition of Steve Mott; correspond with LitiCourt regarding preparation for same deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:00PM - 12:30PM	Suzy Garcia 67.50 USD
04/11/2024	Correspond with attorneys regarding preparation for Deposition of Steve Mott; prepare email to all parties regarding Zoom and AgileLaw links for the remote Deposition of Steve Mott; correspond with LitiCourt regarding preparation for same deposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 5:03PM - 5:15PM	Suzy Garcia 27.00 USD

04/12/2024	Attend Mott deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 11:00AM - 11:24AM	Cyclone Covey 326.00 USD
04/12/2024	Conference call with Garrett from LitiCourt regarding the expedited Deposition transcript of Keith Lerner. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:45PM - 5:03PM	Suzy Garcia 40.50 USD
04/15/2024	Pre-Settlement conference meet and confer w Konnektive counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:27PM - 3:03PM	Cyclone Covey 489.00 USD
04/15/2024	Draft Daubert motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:12 11:39PM - 4:51AM ⁺¹	Kevin Kneupper 4,238.00 USD
04/16/2024	Draft Daubert motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:00 5:39PM - 11:39PM	Kevin Kneupper 4,890.00 USD
04/17/2024	Draft motion for partial summary judgment. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 7:51AM - 9:57AM	Kevin Kneupper 1,711.50 USD
04/17/2024	Draft Daubert motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:42 9:57AM - 5:39PM	Kevin Kneupper 6,275.50 USD
04/17/2024	Defend Merrifield renewed deposition La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:58AM - 12:10PM	Cyclone Covey 163.00 USD
04/18/2024	Call w defendants counsel RE: private mediation and follow up emails RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:22PM - 3:34PM	Cyclone Covey 163.00 USD
04/19/2024	Draft Daubert motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:48 2:03AM - 7:51AM	Kevin Kneupper 4,727.00 USD
04/19/2024	Prepare Stipulation of Facts (Konnektive EULA), Joint Stipulation of Dismissal of Konnektive Rewards LLC, and Stipulation of Dismissal of Affirmative Defenses. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:08PM - 1:32PM	Suzy Garcia 54.00 USD
04/19/2024	File Joint Motion to Vacate April 30t Settlement Conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:23PM - 2:35PM	Suzy Garcia 27.00 USD
04/19/2024	Draft partial summary judgment motion and prepare for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:54 3:45PM - 6:39PM	Kevin Kneupper 2,363.50 USD
04/19/2024	Prepare and file Plaintiff's Motion for Partial Summary Judgment on Affirmative Defenses, Statement of Undisputed Facts, Declaration of K. Kneupper, and supporting Exhibits. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 3:55PM - 4:55PM	Suzy Garcia 135.00 USD
04/19/2024	Review and edit motion to exclude defendants experts La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 5:09PM - 6:09PM	Cyclone Covey 815.00 USD
04/19/2024	Review motion to decertify class and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:39PM - 7:03PM	Kevin Kneupper 326.00 USD

04/19/2024	Draft Daubert motion and prepare for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:48 7:03PM - 1:51AM ⁺¹	Kevin Kneupper 5,542.00 USD
04/19/2024	Prepare and file Plaintiffs Motion for Partial Summary Judgment on Affirmative Defenses, Statement of Undisputed Facts, Declaration of K. Kneupper, and supporting Exhibits. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:24 8:38PM - 12:02AM ⁺¹	Suzy Garcia 459.00 USD
04/19/2024	Prepare and file Plaintiffs Motion for Partial Summary Judgment on Affirmative Defenses, Statement of Undisputed Facts, Declaration of K. Kneupper, and supporting Exhibits. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:00 11:59PM - 2:59AM ⁺¹	Suzy Garcia 405.00 USD
04/22/2024	Conference call with C. Covey regarding final pdfs of filing of Motion for Partial Summary Judgment and Motion to Exclude Expert Testimony; conference call with SD of CA ECF Clerk regarding status of outage; update pleadings folder regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 12:30PM - 1:00PM	Suzy Garcia 67.50 USD
04/23/2024	Email to client updating on settlement conference La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:33AM - 9:39AM	Cyclone Covey 81.50 USD
04/23/2024	Email to mediator requesting permission to create a video La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:39AM - 9:45AM	Cyclone Covey 81.50 USD
04/24/2024	Emails with Court RE: rescheduling settlement conference La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:44AM - 8:50AM	Cyclone Covey 81.50 USD
04/24/2024	Review motion to decertify, outline response, begin drafting legal standard section La Pura - Tan v Quickbox [LTAN-CA-200128]	1:24 9:45AM - 11:09AM	Cyclone Covey 1,141.00 USD
04/25/2024	Review Order regarding Discovery Conference, update case file, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:23AM - 12:29AM	Suzy Garcia 13.50 USD
04/25/2024	Review Orders regarding MSC, Motion to Decertify the Order Certifying the Class, Daubert Motion, and all Motions to Exclude Plaintiff's Experts; update case file and calendar all related deadlines; correspond with K. Kneupper regarding Response deadlines regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:00 12:25PM - 2:25PM	Suzy Garcia 270.00 USD
04/25/2024	Revise argument on damages model in brief La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 12:26PM - 1:02PM	Cyclone Covey 489.00 USD
04/25/2024	Conference call with C. Covey regarding filing of Oppositions to Motion to Decertify and Daubert Motions, due on May 15, 2024. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:40PM - 2:52PM	Suzy Garcia 27.00 USD
04/25/2024	Prepare Joint Stipulation to Dismiss Konnektive Rewards LLC. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:59PM - 11:23PM	Suzy Garcia 54.00 USD
04/26/2024	Prepare Exhibits in support of Opposition to Konnektive Defendants' MSJ; prepare Motion and moving papers regarding same and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:36 3:15PM - 6:51PM	Suzy Garcia 486.00 USD

04/28/2024	Discuss mediation strategy w K Kneupper La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:23PM - 1:41PM	Cyclone Covey 244.50 USD
04/29/2024	Correspond with Network Deposition Services regarding copy of Deposition Transcript for Jonathan Trivelas; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:37PM - 12:49PM	Suzy Garcia 27.00 USD
04/29/2024	Revise estoppel portion of brief in response to motion to decertify class La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 8:06PM - 9:12PM	Cyclone Covey 896.50 USD
04/30/2024	Draft response to Konnektive MSJ. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:54 2:35AM - 5:29AM	Kevin Kneupper 2,363.50 USD
04/30/2024	Revise brief in opposition to motion to decertify - typicality section La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 9:02AM - 10:14AM	Cyclone Covey 978.00 USD
05/01/2024	Draft response to Konnektive MSJ. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:12 5:29AM - 10:41AM	Kevin Kneupper 4,238.00 USD
05/01/2024	Format and continue editing brief in response to motion to decertify - typicality and individualized inquiry section La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 11:58AM - 1:46PM	Cyclone Covey 1,467.00 USD
05/01/2024	Format and continue editing brief in response to motion to decertify - typicality and individualized inquiry section La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 3:04PM - 4:34PM	Cyclone Covey 1,222.50 USD
05/01/2024	Format and continue editing brief in response to motion to decertify - typicality and individualized inquiry section La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 5:00PM - 6:00PM	Cyclone Covey 815.00 USD
05/01/2024	Format and continue editing brief in response to motion to decertify - damages model La Pura - Tan v Quickbox [LTAN-CA-200128]	3:18 7:44PM - 11:02PM	Cyclone Covey 2,689.50 USD
05/02/2024	Draft response to Konnektive MSJ. La Pura - Tan v Quickbox [LTAN-CA-200128]	10:12 10:41AM - 8:53PM	Kevin Kneupper 8,313.00 USD
05/02/2024	Revise opposition to motion to decertify, compile exhibits, begin drafting declaration, add citations, review and revise brief La Pura - Tan v Quickbox [LTAN-CA-200128]	8:00 11:00AM - 7:00PM	Cyclone Covey 6,520.00 USD
05/02/2024	Prepare Response to Konnektive Defendants' Separate Statement of Undisputed Material Facts In Support of MSJ; review and prepare Exhibits In Support of Opposition to Konnektive Defendant's MSJ; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 12:44PM - 1:38PM	Suzy Garcia 121.50 USD
05/02/2024	Prepare Response to Konnektive Defendants' Separate Statement of Undisputed Material Facts In Support of MSJ; review and prepare Exhibits In Support of Opposition to Konnektive Defendant's MSJ; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:30PM - 3:06PM	Suzy Garcia 81.00 USD

05/02/2024	Prepare Response to Konnektive Defendants' Separate Statement of Undisputed Material Facts In Support of MSJ; review and prepare Exhibits In Support of Opposition to Konnektive Defendant's MSJ; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:24 3:13PM - 5:37PM	Suzy Garcia 324.00 USD
05/02/2024	Conduct discovery hearing with Court RE: late spreadsheet La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:08PM - 7:20PM	Cyclone Covey 163.00 USD
05/02/2024	Emails to opposing counsel RE: motion for sanctions re: late production La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 7:20PM - 7:32PM	Cyclone Covey 163.00 USD
05/02/2024	Prepare Response to Konnektive Defendants' Separate Statement of Undisputed Material Facts In Support of MSJ; review and prepare Exhibits In Support of Opposition to Konnektive Defendant's MSJ; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:34PM - 10:58PM	Suzy Garcia 54.00 USD
05/02/2024	Prepare Response to Konnektive Defendants' Separate Statement of Undisputed Material Facts In Support of MSJ; review and prepare Exhibits In Support of Opposition to Konnektive Defendant's MSJ; correspond with K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 11:45PM - 1:03AM ⁺¹	Suzy Garcia 175.50 USD
05/03/2024	Draft mediation brief La Pura - Tan v Quickbox [LTAN-CA-200128]	3:54 11:00AM - 2:54PM	Cyclone Covey 3,178.50 USD
05/03/2024	Begin Slideshow for mediation presentation La Pura - Tan v Quickbox [LTAN-CA-200128]	5:12 3:47PM - 8:59PM	Cyclone Covey 4,238.00 USD
05/03/2024	Review draft mediation statement and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:11PM - 5:35PM	Kevin Kneupper 326.00 USD
05/03/2024	Review opposition to class decertification motion and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 5:35PM - 6:05PM	Kevin Kneupper 407.50 USD
05/03/2024	Prepare Exhibits in support of Opposition to Konnektive Defendants' MSJ; prepare Motion and moving papers regarding same and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:42 7:00PM - 11:42PM	Suzy Garcia 634.50 USD
05/03/2024	Draft motion for summary judgment response and prepare for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	12:24 10:56PM - 11:20AM ⁺¹	Kevin Kneupper 10,106.00 USD
05/03/2024	Prepare Exhibits in support of Opposition to Konnektive Defendants' MSJ; prepare Motion and moving papers regarding same and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:24 11:38PM - 3:02AM ⁺¹	Suzy Garcia 459.00 USD
05/04/2024	Prepare Exhibits in support of Opposition to Konnektive Defendants' MSJ; prepare Motion and moving papers regarding same and file. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:30 3:00AM - 4:30AM	Suzy Garcia 202.50 USD
05/04/2024	Continue work on mediation presentation video La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 12:25PM - 3:07PM	Cyclone Covey 2,200.50 USD

05/04/2024	Continue work on mediation presentation video La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 4:39PM - 6:21PM	Cyclone Covey 1,385.50 USD
05/05/2024	Prepare table of authorities and table of contents, check exhibits and correct citations, assemble final exhibits, revise brief and declaration La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 10:11AM - 11:59AM	Cyclone Covey 1,467.00 USD
05/05/2024	Conference with C. Covey regarding late filing and draft motion for leave re: same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 8:53PM - 9:35PM	Kevin Kneupper 570.50 USD
05/05/2024	Review final version of response to motion to decertify and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 9:35PM - 9:59PM	Kevin Kneupper 326.00 USD
05/06/2024	Initial draft of response to motion exclude Merrifield La Pura - Tan v Quickbox [LTAN-CA-200128]	5:00 10:12AM - 3:12PM	Cyclone Covey 4,075.00 USD
05/06/2024	Prepare shells for Oppositions to Daubert Motions. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 11:41AM - 12:53PM	Suzy Garcia 162.00 USD
05/06/2024	mail out documents La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:45PM - 2:03PM	Elyssa Gerber 22.50 USD
05/06/2024	Draft response to Mann Daubert motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:48 4:08PM - 10:56PM	Kevin Kneupper 5,542.00 USD
05/06/2024	Initial draft of response to motion exclude Merrifield La Pura - Tan v Quickbox [LTAN-CA-200128]	3:36 4:18PM - 7:54PM	Cyclone Covey 2,934.00 USD
05/06/2024	Prepare Joint Stipulation regarding Dismissal of Konnektive Rewards LLC and Stipulation of Facts; correspond with C. Covey and K. Kneupper regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:17PM - 5:41PM	Suzy Garcia 54.00 USD
05/07/2024	Email to opposing counsel re: motion to permit late filing La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:43AM - 9:49AM	Cyclone Covey 81.50 USD
05/07/2024	Intro section of brief in response to motion to exclude Merrifield La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:44AM - 10:02AM	Cyclone Covey 244.50 USD
05/07/2024	Continue revising brief in response to motion to exclude Merrifield, add legal standard, draft declaration, add citations La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 9:44AM - 10:44AM	Cyclone Covey 815.00 USD
05/07/2024	Continue revising brief in response to motion to exclude Merrifield, add legal standard, draft declaration, add citations, finalize exhibits La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 10:54AM - 11:48AM	Cyclone Covey 733.50 USD
05/07/2024	Additional edits to the mediation presentation video La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 11:45AM - 1:27PM	Cyclone Covey 1,385.50 USD
05/07/2024	Prepare and send courtesy copies of Plaintiff's Opposition to Konnektive Defendants' MSJ (Dkt No. 436). La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 1:32PM - 2:50PM	Suzy Garcia 175.50 USD

05/07/2024	Draft response to Mann Daubert motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	5:12 1:39PM - 6:51PM	Kevin Kneupper 4,238.00 USD
05/07/2024	Review mediator video draft and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:44PM - 4:08PM	Kevin Kneupper 326.00 USD
05/07/2024	Emails to opposing counsel RE:leave to file brief late, modify brief in response to emails La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:00PM - 6:12PM	Cyclone Covey 163.00 USD
05/07/2024	Prepare and file Joint Motion for Leave to File After Midnight and Declaration of K. Kneupper. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 9:10PM - 9:46PM	Suzy Garcia 81.00 USD
05/07/2024	Prepare and file Joint Motion for Leave to File After Midnight and Declaration of K. Kneupper. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:46PM - 10:52PM	Suzy Garcia 13.50 USD
05/08/2024	Emails to Konnektive counsel and Quick Box counsel RE: removing confidentiality designations on evidence used in response to motion to decertify the class La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:11PM - 4:17PM	Cyclone Covey 81.50 USD
05/08/2024	Revise opposition to motion to decertify, revise brief and review items designated confidential by opposing party La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:17PM - 4:47PM	Cyclone Covey 407.50 USD
05/08/2024	Review and edit draft of response to Merrifield Daubert motion and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:37PM - 5:07PM	Kevin Kneupper 407.50 USD
05/08/2024	Prepare draft of response to Mann Daubert motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:36 6:51PM - 2:27AM ⁺¹	Kevin Kneupper 6,194.00 USD
05/09/2024	Draft response to Baker Daubert motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	7:18 3:39AM - 10:57AM	Kevin Kneupper 5,949.50 USD
05/09/2024	Review and edit response to motion to exclude Robert Mann La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:06PM - 12:24PM	Cyclone Covey 244.50 USD
05/09/2024	Review Order Granting Joint Motion for Leave for Additional Time to File Opposition and Reply Briefs to Konnektive Defendants' MSJ, update case file, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 3:07PM - 3:19PM	Suzy Garcia 27.00 USD
05/09/2024	Draft response to Ipse Dixit portion of Konnektive brief in response to motion to exclude Baker La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 3:38PM - 4:20PM	Cyclone Covey 570.50 USD
05/09/2024	Draft response to Ipse Dixit portion of Konnektive brief in response to motion to exclude Baker La Pura - Tan v Quickbox [LTAN-CA-200128]	2:18 4:20PM - 6:38PM	Cyclone Covey 1,874.50 USD
05/09/2024	Conference call with C. Covey regarding Oppositions to Motion to Decertify and Daubert Motions; review and prepare Opposition to Motion to Decertify for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:33PM - 5:03PM	Suzy Garcia 67.50 USD

05/09/2024	Prepare for mediation presentaiton La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 5:11PM - 5:47PM	Cyclone Covey 489.00 USD
05/09/2024	Conference call with C. Covey regarding Oppositions to Motion to Decertify and Daubert Motions; review and prepare Opposition to Motion to Decertify for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 8:06PM - 8:24PM	Suzy Garcia 40.50 USD
05/10/2024	Conference call with C. Covey regarding Oppositions to Motion to Decertify and Daubert Motions; review and prepare Opposition to Motion to Decertify for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 1:37AM - 2:43AM	Suzy Garcia 148.50 USD
05/10/2024	Conference call with C. Covey regarding Oppositions to Motion to Decertify and Daubert Motions; review and prepare Opposition to Motion to Decertify for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 8:44AM - 9:56AM	Suzy Garcia 162.00 USD
05/10/2024	Final prep of all Daubert briefs (Mann, Merrifield, Baker), assist in pulling exhibits, final review of briefs and declarations, prepare motion to seal in Merrifield and supporting declaration, add codes for table of authorities in Merrifield, review final briefs; La Pura - Tan v Quickbox [LTAN-CA-200128]	5:12 8:55AM - 2:07PM	Cyclone Covey 4,238.00 USD
05/10/2024	Draft response to Baker Daubert motion and prepare for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:12 10:57AM - 2:09PM	Kevin Kneupper 2,608.00 USD
05/10/2024	Conference call with C. Covey regarding Oppositions to Motion to Decertify and Daubert Motions; review and prepare Opposition to Motion to Decertify for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:10PM - 12:16PM	Suzy Garcia 13.50 USD
05/10/2024	Work with C. Covey and S. Garcia to file motion responses. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:48 2:09PM - 3:57PM	Kevin Kneupper 1,467.00 USD
05/10/2024	Conference call with C. Covey regarding Oppositions to Motion to Decertify and Daubert Motions; review and prepare Opposition to Motion to Decertify for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:48 2:54PM - 6:42PM	Suzy Garcia 513.00 USD
05/10/2024	Revise brief in opposition to motion to exclude Baker La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 4:00PM - 4:36PM	Cyclone Covey 489.00 USD
05/10/2024	Review and edit brief in opposition to motion to exclude Mann La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:36PM - 5:00PM	Cyclone Covey 326.00 USD
05/10/2024	Review exhibits and remove extra pages - brief in opposition to motion to decertify La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:00PM - 5:18PM	Cyclone Covey 244.50 USD
05/10/2024	Conference call with C. Covey regarding Oppositions to Motion to Decertify and Daubert Motions; review and prepare Opposition to Motion to Decertify for filing. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 7:13PM - 7:49PM	Suzy Garcia 81.00 USD
05/11/2024	Review Konnektive Daubert opposition. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 1:40PM - 1:58PM	Kevin Kneupper 244.50 USD

05/13/2024	Prepare and send courtesy copies of sealed documents regarding Dkt. No. 438, per Clerk's requests; prepare Camber's Courtesy Copies of Plaintiff's Oppositions to Daubert Motions and Motion to Decertify. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 5:31AM - 7:07AM	Suzy Garcia 216.00 USD
05/15/2024	Draft response to Mann Daubert motion. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 2:27AM - 3:39AM	Kevin Kneupper 978.00 USD
05/16/2024	Draft initial response to rebuttal expert classification in Daubert reply La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 7:10PM - 8:04PM	Cyclone Covey 733.50 USD
05/17/2024	Review Case Docket, Konnektive's Reply ISO Motion for Summary Judgment, and update Case file. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 4:23AM - 5:11AM	Suzy Garcia 108.00 USD
05/17/2024	Review Case Docket, Konnektive's Reply ISO Motion for Summary Judgment, and update Case file; review service emails regarding Discovery documents, update case file, and calendar all related deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 5:15AM - 5:51AM	Suzy Garcia 81.00 USD
05/17/2024	Revise reply brief in support of motion to exclude Defendants' rebuttal experts La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 9:51AM - 9:57AM	Cyclone Covey 81.50 USD
05/17/2024	Revise reply brief in support of motion to exclude Defendants' rebuttal experts La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 10:04AM - 10:52AM	Cyclone Covey 652.00 USD
05/17/2024	Revise reply brief in support of motion to exclude Defendants' rebuttal experts La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 12:48PM - 2:30PM	Cyclone Covey 1,385.50 USD
05/17/2024	Draft reply sections to vicarious liability and citations to record for reply brief ISO Plaintiff's MSJ La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 5:21PM - 6:39PM	Cyclone Covey 1,059.50 USD
05/20/2024	Review Expert Deposition Transcripts and update case file; review case docket and update file with all Replies to Daubert Motions and Motion to Decertify. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 1:45PM - 2:57PM	Suzy Garcia 162.00 USD
05/21/2024	Review Konnektive defendants' reply briefs (Daubert motions and motion to decertify); review applicable law related to new arguments raised in reply briefs La Pura - Tan v Quickbox [LTAN-CA-200128]	1:12 6:00PM - 7:12PM	Cyclone Covey 978.00 USD
05/21/2024	Prepare for mediation opening statement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 7:12PM - 7:42PM	Cyclone Covey 407.50 USD
05/22/2024	Attend Konnektive mediation La Pura - Tan v Quickbox [LTAN-CA-200128]	9:00 9:00AM - 6:00PM	Cyclone Covey 7,335.00 USD
05/22/2024	Prepare for and attend mediation with Konnektive Defendants. La Pura - Tan v Quickbox [LTAN-CA-200128]	9:36 11:10AM - 8:46PM	Kevin Kneupper 7,824.00 USD
05/23/2024	Draft email to opposing counsel RE: next steps La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:11AM - 11:23AM	Cyclone Covey 163.00 USD

05/24/2024	Conference with opposing counsel regarding settlement draft. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 12:50PM - 1:08PM	Kevin Kneupper 244.50 USD
05/24/2024	Conference with opposing counsel RE: details of settlement and GA action, and follow up email RE: same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:06PM - 1:30PM	Cyclone Covey 326.00 USD
05/24/2024	Initial draft of tolling agreement for fraudulent transfer action La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:30PM - 1:54PM	Cyclone Covey 326.00 USD
05/28/2024	Draft joint notice to Court regarding mediation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:00PM - 4:12PM	Kevin Kneupper 163.00 USD
05/28/2024	Emails w opposing counsel RE: status update to court La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:13PM - 4:31PM	Cyclone Covey 244.50 USD
05/28/2024	Finalize and file joint notice regarding mediation. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:24PM - 4:36PM	Kevin Kneupper 163.00 USD
05/29/2024	Text to get status update to Rick James La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:44PM - 2:50PM	Cyclone Covey 81.50 USD
06/04/2024	Status conference with Judge Leshner La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:37PM - 3:07PM	Cyclone Covey 407.50 USD
06/04/2024	Email to opposing counsel RE: next steps on settlement agreement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 3:07PM - 3:13PM	Cyclone Covey 81.50 USD
06/04/2024	Attend status conference regarding settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 9:37PM - 10:07PM	Kevin Kneupper 407.50 USD
06/05/2024	Call w opposing counsel RE: settlement dispute La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:52AM - 11:58AM	Cyclone Covey 81.50 USD
06/05/2024	Email to mediator to request follow up to resolve disputed settlement issue La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 11:58AM - 12:04PM	Cyclone Covey 81.50 USD
06/05/2024	Discuss rules that would permit (or not) an appeal of settlement decision to the 9th circuit La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 12:04PM - 12:10PM	Cyclone Covey 81.50 USD
06/05/2024	Conference with opposing counsel regarding settlement issues. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 10:31PM - 10:37PM	Kevin Kneupper 81.50 USD
06/10/2024	Emails to Konnektive counsel on appeal rights related to settlement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:36AM - 8:42AM	Cyclone Covey 81.50 USD
06/11/2024	Conference w Konnektive counsel on settlement status La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 6:16PM - 6:34PM	Cyclone Covey 244.50 USD

06/11/2024	Conference regarding settlement process with opposing counsel. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:46PM - 9:58PM	Kevin Kneupper 163.00 USD
06/24/2024	Email Konnektive counsel checking on status of settlement agreement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:49PM - 4:55PM	Cyclone Covey 81.50 USD
06/25/2024	Review email from opposing counsel, draft joint status report and email same to opposing counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:36PM - 4:48PM	Cyclone Covey 163.00 USD
06/25/2024	Review and file joint status report. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:07PM - 10:19PM	Kevin Kneupper 163.00 USD
06/26/2024	Initial review and edit of long form settlement proposed by Konnektive counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 8:50AM - 9:38AM	Cyclone Covey 652.00 USD
06/26/2024	Detailed review of Konnektive draft settlement agreement and comparison to Quick Box settlement, notes on document of key document La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 10:52AM - 11:58AM	Cyclone Covey 896.50 USD
07/01/2024	Review draft settlement with Konnektive and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 6:55PM - 8:13PM	Kevin Kneupper 1,059.50 USD
07/02/2024	Review K Kneupper edits and comments to Konnektive settlement draft, make additional edits to provide for a combined common and net funds, notes to K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 8:03AM - 8:39AM	Cyclone Covey 489.00 USD
07/02/2024	Discuss edits to Konnektive settlement w K Kneupper, revise same, email redline of settlement draft to Konnektive's counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 3:54PM - 4:18PM	Cyclone Covey 326.00 USD
07/02/2024	Conference with C. Covey regarding Konnektive settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:19PM - 8:25PM	Kevin Kneupper 81.50 USD
07/09/2024	Attend status conference regarding Konnektive settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:17PM - 2:41PM	Kevin Kneupper 326.00 USD
07/09/2024	Conference with opposing counsel regarding settlement draft. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:41PM - 3:05PM	Kevin Kneupper 326.00 USD
07/09/2024	Review draft settlement with Konnektive and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:05PM - 3:35PM	Kevin Kneupper 407.50 USD
07/09/2024	Emails with opposing counsel coordinating time for discussion on settlement agreement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:59PM - 5:05PM	Cyclone Covey 81.50 USD
07/09/2024	Status hearing with Court La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 4:59PM - 5:29PM	Cyclone Covey 407.50 USD

07/10/2024	Call w opposing counsel on Konnektive settlement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:32PM - 2:44PM	Cyclone Covey 163.00 USD
07/10/2024	Assemble clean copy of settlement with Konnektive and email to Quick Box counsel for input La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 2:44PM - 2:50PM	Cyclone Covey 81.50 USD
07/16/2024	Conference with Quick Box counsel regarding settlement process and conference with C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:28AM - 2:58AM	Kevin Kneupper 407.50 USD
07/16/2024	Review draft revisions from Quick Box to Konnektive settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:58AM - 3:10AM	Kevin Kneupper 163.00 USD
07/16/2024	Review draft settlement with Konnektive and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:22AM - 4:28AM	Kevin Kneupper 81.50 USD
07/16/2024	Phone call with Quick Box counsel RE: Konnektive settlement agreement, review and mark up Quick Box edits to Konnektive settlement, message to K Kneupper RE: same, email to defendants RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 12:59PM - 1:23PM	Cyclone Covey 326.00 USD
07/16/2024	Review Konnektive's counsel comments on settlement agreement, redline same, email redlines to Quick Box and Konnektive counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 8:36PM - 8:48PM	Cyclone Covey 163.00 USD
07/17/2024	Attend status conference with Judge Leshner La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 2:57PM - 3:21PM	Cyclone Covey 326.00 USD
07/17/2024	Call with Konnektive counsel and emails re: changes to Konnektive settlement agreement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:56PM - 4:14PM	Cyclone Covey 244.50 USD
07/17/2024	Attend status conference. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:21PM - 5:45PM	Kevin Kneupper 326.00 USD
07/17/2024	Conference with C. Covey regarding settlement draft with Konnektive. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:45PM - 6:03PM	Kevin Kneupper 244.50 USD
07/17/2024	Conference with C. Covey and S. Freeland regarding settlement draft with Konnektive. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:03PM - 6:15PM	Kevin Kneupper 163.00 USD
07/22/2024	Attend status conference with Judge Leshner La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 4:41PM - 4:59PM	Cyclone Covey 244.50 USD
07/22/2024	Attend status conference regarding settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 11:40PM - 11:58PM	Kevin Kneupper 244.50 USD
07/22/2024	Draft motion to approve Konnektive settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:18 11:58PM - 1:16AM ⁺¹	Kevin Kneupper 1,059.50 USD

07/23/2024	Draft motion for approval of Konnektive Settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 5:08PM - 7:14PM	Kevin Kneupper 1,711.50 USD
07/25/2024	E-mail P. Laurent regarding NCLC cy pres application. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 11:08PM - 11:20PM	Kevin Kneupper 163.00 USD
07/26/2024	Create first draft of exhibits for Konnektive settlement agreement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:42 5:47PM - 6:29PM	Cyclone Covey 570.50 USD
07/27/2024	Review draft exhibits to Konnektive settlement and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:10PM - 10:34PM	Kevin Kneupper 326.00 USD
07/29/2024	Review and revise draft motion for preliminary settlement approval for Konnektive defendants, notes to K Kneupper RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:05PM - 2:35PM	Cyclone Covey 407.50 USD
07/29/2024	Draft motion for approval of Konnektive settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 2:26PM - 5:08PM	Kevin Kneupper 2,200.50 USD
07/29/2024	E-mail opposing counsel draft preliminary motion for approval of Konnektive settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 7:14PM - 7:20PM	Kevin Kneupper 81.50 USD
08/06/2024	Review suggested edits to settlement documents and motion from Konnektive and message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:28PM - 1:52PM	Kevin Kneupper 326.00 USD
08/14/2024	E-mail opposing counsel regarding redlined exhibits and status of review of settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:10PM - 8:16PM	Kevin Kneupper 81.50 USD
08/17/2024	Review final edits to settlement agreement exhibits, email RE: same to opposing counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:33AM - 9:45AM	Cyclone Covey 163.00 USD
08/18/2024	Review draft settlement edits and message C. Covey re: same. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:33PM - 4:39PM	Kevin Kneupper 81.50 USD
08/21/2024	Review final drafts of settlement and exhibits for any errors or issues; message C. Covey regarding same. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:36 3:59PM - 5:35PM	Kevin Kneupper 1,304.00 USD
08/22/2024	Review of exhibits and correction of typos, emails to opposing counsel RE: same, email to client RE: same, compile final documents and send to client for e-signature. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 5:22PM - 5:58PM	Cyclone Covey 489.00 USD
08/23/2024	Call w opposing counsel RE: settlement La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 5:07PM - 5:13PM	Cyclone Covey 81.50 USD
08/27/2024	Finalize draft of motion for preliminary approval of Konnektive settlement and exhibits. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:54 11:21PM - 2:15AM ⁺¹	Kevin Kneupper 2,363.50 USD

08/29/2024	Review and revise my declaration ISO motion for preliminary approval La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 9:59AM - 10:17AM	Cyclone Covey 244.50 USD
08/30/2024	file dismissal without prejudice La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 12:45PM - 12:57PM	Elyssa Gerber 16.00 USD
09/02/2024	Final revisions to motion for preliminary approval of Konnektive settlement, finalize TOC and TOA La Pura - Tan v Quickbox [LTAN-CA-200128]	0:54 2:29PM - 3:23PM	Cyclone Covey 733.50 USD
09/02/2024	Prepare final version of motion for preliminary approval of Konnektive settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 5:02PM - 5:26PM	Kevin Kneupper 326.00 USD
09/03/2024	Prepare and file motion for preliminary approval of Konnektive settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:26PM - 5:44PM	Kevin Kneupper 244.50 USD
09/10/2024	Review order RE: approval of Quick Box settlement, calendar deadlines. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 7:48AM - 8:24AM	Cyclone Covey 489.00 USD
09/20/2024	Review and respond to emails scheduling call with Quick Box counsel and class administrator, email to same group RE: settlement website URL La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 9:15AM - 9:27AM	Cyclone Covey 163.00 USD
09/23/2024	Conference with Epiq and Quick Box regarding approval of Quick Box settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:50PM - 5:02PM	Kevin Kneupper 163.00 USD
09/25/2024	Call w opposing counsel RE: inadmissibility of statements made by Knuth in assisting settlement administrator La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 4:46PM - 4:52PM	Cyclone Covey 81.50 USD
10/07/2024	Prepare and file notice of errata and e-mail proposed order to Court. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 5:24PM - 5:42PM	Kevin Kneupper 244.50 USD
10/10/2024	Review order granting approval of Konnektive settlement, notify class administrator RE: same, reply to opposing counsel's email RE: same La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 6:00PM - 6:12PM	Cyclone Covey 163.00 USD
10/17/2024	Review final documents for publication by settlement administrator, email to administrator RE: issues on claim form La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:16PM - 1:40PM	Cyclone Covey 326.00 USD
10/17/2024	Discussion w Quick Box counsel on prepopulated claim form La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:02PM - 4:14PM	Cyclone Covey 163.00 USD
10/17/2024	Review Konnektive data for claim form resolution, email RE: same to Quick Box Counsel La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 4:14PM - 4:38PM	Cyclone Covey 326.00 USD
10/18/2024	Phone call with QuickBox counsel concerning revised class notice, review voicemail from QB counsel re same discuss same with Kevin Kneupper and voicemail to settlement administrator concerning same issue La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 4:35PM - 4:47PM	Cyclone Covey 163.00 USD

10/20/2024	Review of data produced by Konnektive and Quick Box in preparation for call with settlement administrator La Pura - Tan v Quickbox [LTAN-CA-200128]	1:06 7:38AM - 8:44AM	Cyclone Covey 896.50 USD
10/21/2024	Review spreadsheets to be used for class notice, analyze which spreadsheets can be used to identify customers La Pura - Tan v Quickbox [LTAN-CA-200128]	0:48 1:45PM - 2:33PM	Cyclone Covey 652.00 USD
10/21/2024	Call w Quick Box counsel and settlement administrator on class notice logistics La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 2:29PM - 3:05PM	Cyclone Covey 489.00 USD
10/21/2024	Conference with Epiq and Quick Box counsel re: notice to class. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 2:59PM - 3:29PM	Kevin Kneupper 407.50 USD
10/21/2024	Additional review of spreadsheets and emails to case administrator on obtaining proper list of class members La Pura - Tan v Quickbox [LTAN-CA-200128]	0:18 3:29PM - 3:47PM	Cyclone Covey 244.50 USD
11/11/2024	Draft motion for attorney's fees. La Pura - Tan v Quickbox [LTAN-CA-200128]	1:42 12:18PM - 2:00PM	Kevin Kneupper 1,385.50 USD
11/12/2024	Message C. Covey regarding motion for attorney's fees for Quick Box and raw data export of billing and costs. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 2:00PM - 2:12PM	Kevin Kneupper 163.00 USD
11/12/2024	Pull expenses and time related to action pre-QB settlement and time related to QB settlement after settlement execution La Pura - Tan v Quickbox [LTAN-CA-200128]	0:30 3:18PM - 3:48PM	Cyclone Covey 407.50 USD
11/14/2024	Draft motion for attorney's fees for Quick Box settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:42 3:36PM - 6:18PM	Kevin Kneupper 2,200.50 USD
11/16/2024	Draft motion for attorney's fees for Quick Box settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 2:56PM - 5:02PM	Kevin Kneupper 1,711.50 USD
11/21/2024	Draft motion for attorney's fees under Quick Box settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	3:36 4:51PM - 8:27PM	Kevin Kneupper 2,934.00 USD
11/22/2024	Pull expenses and time records for fee application on QB settlement La Pura - Tan v Quickbox [LTAN-CA-200128]	2:06 8:33AM - 10:39AM	Cyclone Covey 1,711.50 USD
11/22/2024	Draft and file motion for attorney's fees relating to Quick Box settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	6:42 10:09AM - 4:51PM	Kevin Kneupper 5,460.50 USD
11/22/2024	Revise motion for attorney's fees. Add Table of Authorities La Pura - Tan v Quickbox [LTAN-CA-200128]	1:00 5:02PM - 6:02PM	Cyclone Covey 815.00 USD
11/23/2024	E-mail proposed order to Judge's chambers for motion for attorney's fees. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 8:27PM - 8:33PM	Kevin Kneupper 81.50 USD
12/02/2024	Draft and file motion for final approval of Quick Box settlement. La Pura - Tan v Quickbox [LTAN-CA-200128]	4:12 1:38PM - 5:50PM	Kevin Kneupper 3,423.00 USD

12/02/2024	Review and revise motion for final settlement approval of Quick Box settlement, add TOC and TOA, review and revise supporting declaration La Pura - Tan v Quickbox [LTAN-CA-200128]	0:36 8:26PM - 9:02PM	Cyclone Covey 489.00 USD
12/03/2024	Discussion w QB Counsel and settlement administrator on advertising to increase claims rate La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 1:30PM - 1:54PM	Cyclone Covey 326.00 USD
12/03/2024	Conference with Epiq and opposing counsel regarding notice campaign. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 6:20PM - 6:44PM	Kevin Kneupper 326.00 USD
12/14/2024	E-mail Epiq re: supplemental notice ads and e-mails. La Pura - Tan v Quickbox [LTAN-CA-200128]	0:06 1:21PM - 1:27PM	Kevin Kneupper 81.50 USD
12/19/2024	Pull expenses for Konnektive settlement fee application La Pura - Tan v Quickbox [LTAN-CA-200128]	0:24 10:06AM - 10:30AM	Cyclone Covey 326.00 USD
12/22/2024	Pull time for Konnektive fee motion La Pura - Tan v Quickbox [LTAN-CA-200128]	0:12 10:59AM - 11:11AM	Cyclone Covey 163.00 USD

EXHIBIT 4

username	fname	lname	local_date	local_day	hours	jobcode	notes
cyclone@nmappercovey.com	Cyclone	Covey	1/13/20	Mon	5.8	La Pura	discuss findings with K Kneupper
kevin@nmappercovey.com	Kevin	Kneupper	1/13/20	Mon	0.3	La Pura	Conference with C. Covey regarding La Pura.
cyclone@nmappercovey.com	Cyclone	Covey	1/14/20	Tue	0.3	La Pura	Emails w prospective client about her experience with La Pura and discuss same with K Kneupper
kevin@nmappercovey.com	Kevin	Kneupper	1/14/20	Tue	0.3	La Pura	Conference with C. Covey regarding client's factual background.
kevin@nmappercovey.com	Kevin	Kneupper	1/26/20	Sun	3.9	La Pura	Search for information regarding La Pura and related affiliates; review websites and back up materials.
cyclone@nmappercovey.com	Cyclone	Covey	1/27/20	Mon	0.5	La Pura	Discuss claim with potential client
cyclone@nmappercovey.com	Cyclone	Covey	1/28/20	Tue	0.4	La Pura	Emails with client about process and shipping, next steps
cyclone@nmappercovey.com	Cyclone	Covey	1/29/20	Wed	0.4	La Pura	assign server research of defendants to C Blankeneyer, review WHOIS information for their servers and review website terms and conditions
cyclone@nmappercovey.com	Cyclone	Covey	1/30/20	Thu	0.1	La Pura	confirm box to get items from client was shipped
kevin@nmappercovey.com	Kevin	Kneupper	2/3/20	Mon	4.8	La Pura	Review evidence relating to La Pura; analyze issues relating to potential complaint.
kevin@nmappercovey.com	Kevin	Kneupper	2/4/20	Tue	0.3	La Pura	E-mail E. Giglia regarding attorney to draft La Pura complaint.
cyclone@nmappercovey.com	Cyclone	Covey	2/7/20	Fri	2	La Pura	Research Quickbox founders
kevin@nmappercovey.com	Kevin	Kneupper	2/7/20	Fri	3.7	La Pura	Research Quickbox and prior websites; research and review court filings in Quickbox case; e-mail C. Covey regarding same.
kevin@nmappercovey.com	Kevin	Kneupper	2/8/20	Sat	1.7	La Pura	Research Quickbox connection to free trial scams.
cyclone@nmappercovey.com	Cyclone	Covey	2/9/20	Sun	4.2	La Pura	research Zachads, founders, other employees
cyclone@nmappercovey.com	Cyclone	Covey	2/10/20	Mon	7.77	La Pura	begin drafting memo for complaint against La Pura including all citations and websites.
cyclone@nmappercovey.com	Cyclone	Covey	2/11/20	Tue	4.1	La Pura	Continue drafting quickbox complaint details; call with K Kneupper RE same
kevin@nmappercovey.com	Kevin	Kneupper	2/11/20	Tue	0.8	La Pura	Conference with C. Covey regarding Quickbox involvement in scam.
cyclone@nmappercovey.com	Cyclone	Covey	2/12/20	Wed	5.2	La Pura	Internet searches to find other scammers lullied by La Pura
kevin@nmappercovey.com	Kevin	Kneupper	2/13/20	Thu	0.3	La Pura	Review contract for freelance attorney, e-mail Montage Legal regarding hiring freelance attorney for case work.
kevin@nmappercovey.com	Kevin	Kneupper	2/14/20	Fri	0.8	La Pura	Prepare materials for M. Smith; e-mail M. Smith regarding case; conference with M. Smith regarding preparation of draft complaint.
cyclone@nmappercovey.com	Cyclone	Covey	2/17/20	Mon	1.5	La Pura	Save websites related to quick box part of complaint
cyclone@nmappercovey.com	Cyclone	Covey	2/20/20	Thu	0.5	La Pura	review source code of scam site to find connections to other software companies and email results of findings RE same to K Kneupper
cyclone@nmappercovey.com	Cyclone	Covey	2/20/20	Thu	3.9	La Pura	Complete downloading all sites that are referenced in the narrative for the QB part of the complaint.
kevin@nmappercovey.com	Kevin	Kneupper	2/20/20	Thu	1.3	La Pura	Research prior cases involving CodeClouds.
kevin@nmappercovey.com	Kevin	Kneupper	2/21/20	Fri	3.7	La Pura	client; e-mail M. Smith regarding client e-mails and merchant processing issue; research information regarding CodeClouds involvement in La Pura; e-mail C. Covey regarding issues relating to suing Indian parent corporation.
kevin@nmappercovey.com	Kevin	Kneupper	2/25/20	Tue	0.2	La Pura	E-mail C. Covey regarding questions from M. Smith about case; e-mail M. Smith regarding case questions.
kevin@nmappercovey.com	Kevin	Kneupper	2/27/20	Thu	0.1	La Pura	E-mail M. Smith regarding draft La Pura complaint.
cyclone@nmappercovey.com	Cyclone	Covey	2/28/20	Fri	1	La Pura	Review LinkedIn Crm website and archive entire website; initial review of draft complaint from associate, discuss same w K Kneupper
kevin@nmappercovey.com	Kevin	Kneupper	2/28/20	Fri	0.3	La Pura	E-mail M. Smith regarding draft complaint; conference with C. Covey regarding draft complaint.
cyclone@nmappercovey.com	Cyclone	Covey	2/29/20	Sat	1.1	La Pura	Review draft complaint and make notes for discussion next week
kevin@nmappercovey.com	Kevin	Kneupper	3/1/20	Sun	2.1	La Pura	Review and comment on draft of La Pura complaint.
cyclone@nmappercovey.com	Cyclone	Covey	3/2/20	Mon	0.2	La Pura	Archive US version of scam website
cyclone@nmappercovey.com	Cyclone	Covey	3/2/20	Mon	1.5	La Pura	Review complaint with Meg and K Kneupper and discuss questions and needed edits.
kevin@nmappercovey.com	Kevin	Kneupper	3/2/20	Mon	5.6	La Pura	E-mail M. Smith regarding scheduling conference call; e-mail C. Covey regarding planned additions to complaint; conference with M. Smith and C. Covey regarding draft complaint; research information relating to Komnektive; review archived Komnektive website materials; conference with C. Covey regarding Komnektive.
cyclone@nmappercovey.com	Cyclone	Covey	3/3/20	Tue	6.6	La Pura	Archive Komnektive Crm pages and draft narrative for complaint. Review multiple websites discussing the CRM and what features it has to assist scammers. Look up addresses for QuickBooks defendants for service. Conference with K Kneupper concerning evidence found.
kevin@nmappercovey.com	Kevin	Kneupper	3/3/20	Tue	0.4	La Pura	Conference with C. Covey regarding Komnektive.
cyclone@nmappercovey.com	Cyclone	Covey	3/5/20	Thu	1	La Pura	archive websites and pages on Komnektive flagged by K Kneupper
cyclone@nmappercovey.com	Cyclone	Covey	3/9/20	Mon	2.3	La Pura	Conference w K Kneupper on what parties to add as defendants; conference w K Kneupper and C Blankeneyer to determine if other sites found are connected to La Pura and how we might find other associated sites; review revised complaint draft by Meg Smith; discuss her comments with K Kneupper
kevin@nmappercovey.com	Kevin	Kneupper	3/9/20	Mon	1.6	La Pura	Conference with C. Covey and C. Blankeneyer regarding "false front" websites and ways to trace other websites of John Doe Defendants.
kevin@nmappercovey.com	Kevin	Kneupper	3/12/20	Thu	1.2	La Pura	Research and analyze HICO issues relating to draft complaint.
cyclone@nmappercovey.com	Cyclone	Covey	3/13/20	Fri	1.8	La Pura	review draft complaint, conference with Meg Smith and K Kneupper RE: complaint edits; review Komnektive documents, look up service address for Komnektive CEO; google search for more posts on Komnektive and its connection to defendants.
cyclone@nmappercovey.com	Cyclone	Covey	3/13/20	Fri	1.8	La Pura	Review complaint with Meg and K Kneupper and discuss questions and needed edits.
kevin@nmappercovey.com	Kevin	Kneupper	3/13/20	Fri	3.2	La Pura	Review draft complaint; research and analyze issues relating to HICO claim; conference call with C. Covey and M. Smith regarding changes to draft complaint.
cyclone@nmappercovey.com	Cyclone	Covey	3/19/20	Fri	0.8	La Pura	narrative.
kevin@nmappercovey.com	Kevin	Kneupper	3/19/20	Fri	1.4	La Pura	Search for information regarding additional potential defendants; e-mail C. Covey and M. Smith regarding same.
kevin@nmappercovey.com	Kevin	Kneupper	4/14/20	Tue	2.5	La Pura	Review Quick Box website for information relating to activities.
kevin@nmappercovey.com	Kevin	Kneupper	4/15/20	Wed	5.9	La Pura	Review prior court documents; identify key aspects of prior case; edit complaint.
kevin@nmappercovey.com	Kevin	Kneupper	4/16/20	Thu	8	La Pura	Investigate Quick Box Defendants; research S. Adele; search for podcasts and other videos featuring Quick Box employees; edit complaint.
cyclone@nmappercovey.com	Cyclone	Covey	4/17/20	Fri	0.1	La Pura	Discuss priorities and defendants to include with K Kneupper
kevin@nmappercovey.com	Kevin	Kneupper	4/17/20	Fri	6.3	La Pura	Review videos of S. Adele discovered online; investigate Quick Box Defendants; edit draft of complaint.
kevin@nmappercovey.com	Kevin	Kneupper	4/20/20	Mon	2.3	La Pura	Edit draft of Complaint.
kevin@nmappercovey.com	Kevin	Kneupper	4/21/20	Tue	3.5	La Pura	Draft complaint.
kevin@nmappercovey.com	Kevin	Kneupper	4/24/20	Fri	4.7	La Pura	Draft complaint.
kevin@nmappercovey.com	Kevin	Kneupper	4/27/20	Mon	1.2	La Pura	Draft complaint.
cyclone@nmappercovey.com	Cyclone	Covey	4/28/20	Tue	0.1	La Pura	Set up relevant Google alerts related to defendants

cyclone@nmappercovey.com	Cyclone	Covey	5/6/20	Wed	0.2 La Pura	email update to client
kevin@nmappercovey.com	Kevin	Kneupper	5/15/20	Fri	4 La Pura	Review and edit draft of complaint.
kevin@nmappercovey.com	Kevin	Kneupper	5/16/20	Sat	6.5 La Pura	Edit draft of complaint; e-mail C. Covey regarding updated draft to send to client; search for information regarding merchant accounts used to bill clients; review false front websites associated with merchant accounts; review corporate for network of companies associated with Doe scammers and attempt to identify Does.
kevin@nmappercovey.com	Kevin	Kneupper	5/17/20	Sun	2 La Pura	Search for and review corporate and website information related to Doe scammers and attempt to identify Does.
cyclone@nmappercovey.com	Cyclone	Covey	5/18/20	Mon	4 La Pura	Review emails from K Kneupper RE: agent for scam, begin saving company information, tracer research on officers who signed up for Total Health TDA company, set up spreadsheet for all scam companies, research Elinor Spector background, call with K Kneupper RE: same
kevin@nmappercovey.com	Kevin	Kneupper	5/18/20	Mon	2.8 La Pura	Conference with C. Covey regarding false front websites for Doe scammer; review websites and information relating to Doe scammers and search for materials relating to their identity.
cyclone@nmappercovey.com	Cyclone	Covey	5/19/20	Tue	3.8 La Pura	Scrape relevant websites to populate data in spreadsheet; give full assignment to B Mammio, continue saving websites and adding to spreadsheet; review website data with K Kneupper; begin saving all websites that use Konnective scripts, phone conference w Kneupper
cyclone@nmappercovey.com	Cyclone	Covey	5/19/20	Tue	3.2 La Pura	Conference with C. Covey regarding La Pura "false front" websites and collection of information regarding corporate shell entities; review shell entity websites; draft complaint.
kevin@nmappercovey.com	Kevin	Kneupper	5/20/20	Wed	8.4 La Pura	Source web for websites attributed to companies registered by Elinor Spector; add companies and URLs to complaint; spreadsheet; archive websites
kevin@nmappercovey.com	Kevin	Kneupper	5/20/20	Wed	4 La Pura	Edit draft of complaint.
cyclone@nmappercovey.com	Cyclone	Covey	5/21/20	Thu	7.5 La Pura	Continue working on list of websites for complaint
kevin@nmappercovey.com	Kevin	Kneupper	5/21/20	Thu	8.2 La Pura	Edit draft of complaint; search for original versions of before and after photos featured on La Pura landing page; review websites relating to merchant accounts used to bill L. Tan.
cyclone@nmappercovey.com	Cyclone	Covey	5/22/20	Fri	4 La Pura	Complete list of websites for complaint of companies registered by Elinor Spector
kevin@nmappercovey.com	Kevin	Kneupper	5/23/20	Sat	1.2 La Pura	Edit draft of complaint.
kevin@nmappercovey.com	Kevin	Kneupper	5/23/20	Sat	3.2 La Pura	Review false front websites; draft complaint.
kevin@nmappercovey.com	Kevin	Kneupper	5/25/20	Mon	2.9 La Pura	Research QuickBox employees and past business activities; edit draft of complaint.
kevin@nmappercovey.com	Kevin	Kneupper	5/28/20	Thu	6.8 La Pura	Review ZChads archived materials and old website versions; research background of QuickBox and ZChads employees; edit draft of complaint.
kevin@nmappercovey.com	Kevin	Kneupper	5/29/20	Fri	2.2 La Pura	Research information relating to ZChads; edit draft of complaint.
kevin@nmappercovey.com	Kevin	Kneupper	6/1/20	Mon	5.3 La Pura	Research information relating to ZChads and QuickBox; edit draft of complaint.
kevin@nmappercovey.com	Kevin	Kneupper	6/2/20	Tue	4.8 La Pura	Search for and review videos from QuickBox executive team; edit draft of complaint.
kevin@nmappercovey.com	Kevin	Kneupper	6/3/20	Wed	6.8 La Pura	Investigate Konnective Facebook posts and videos; research information relating to FunnelKonnect product and Konnective involvement in merchant processing; edit draft of complaint; e-mail C. Covey regarding preservation of FunnelKonnect website.
kevin@nmappercovey.com	Kevin	Kneupper	6/4/20	Thu	4.4 La Pura	Review M. Martorano videos; edit draft of complaint.
kevin@nmappercovey.com	Kevin	Kneupper	6/5/20	Fri	7.3 La Pura	Review M. Martorano videos; e-mail C. Covey regarding video of M. Martorano on panel at Panama Banking Summit; research information on Konnective online; edit draft of complaint.
cyclone@nmappercovey.com	Cyclone	Covey	6/8/20	Mon	0.7 La Pura	Call w K Kneupper RE: Konnective loadbalancing and research websites and facebook pages
kevin@nmappercovey.com	Kevin	Kneupper	6/9/20	Tue	10.4 La Pura	Search for documentation on Konnective; review third party technical documentation regarding Konnective software; review Facebook page for Konnective and e-mail C. Covey regarding same; conference with C. Covey regarding load balancing functionality; edit draft of complaint.
cyclone@nmappercovey.com	Cyclone	Covey	6/10/20	Wed	0.2 La Pura	Search for and review prior lawsuits against Konnective; e-mail C. Covey regarding lawsuit by former CTO of Konnective; review posts and various materials on Konnective Facebook page; review spreadsheet of shell companies and e-mail C. Covey regarding same; draft complaint.
kevin@nmappercovey.com	Kevin	Kneupper	6/10/20	Wed	8.3 La Pura	Review shell company spreadsheet; search for information regarding shell companies; draft complaint.
cyclone@nmappercovey.com	Cyclone	Covey	6/11/20	Thu	0.3 La Pura	review email from K Kneupper concerning refund to client and respond to same
kevin@nmappercovey.com	Kevin	Kneupper	6/11/20	Thu	9.7 La Pura	Edit draft of complaint; e-mail C. Covey regarding draft.
cyclone@nmappercovey.com	Cyclone	Covey	6/12/20	Fri	1.4 La Pura	detailed review of final complaint draft, send redline to K Kneupper
kevin@nmappercovey.com	Kevin	Kneupper	6/12/20	Fri	6.3 La Pura	Edit draft of complaint; prepare complaint and exhibits for filing; file complaint.
cyclone@nmappercovey.com	Cyclone	Covey	6/14/20	Sun	0.1 La Pura	discuss plan for service with K Kneupper
cyclone@nmappercovey.com	Cyclone	Covey	6/15/20	Mon	0.3 La Pura	discuss service with Rapid Legal and follow up email RE: same
kevin@nmappercovey.com	Kevin	Kneupper	6/15/20	Mon	0.1 La Pura	E-mail C. Covey regarding filing.
cyclone@nmappercovey.com	Cyclone	Covey	6/16/20	Tue	0.1 La Pura	phone call with service vendor to answer their questions.
cyclone@nmappercovey.com	Cyclone	Covey	6/17/20	Wed	0.3 La Pura	Review quote for service of defendants; speak with K Kneupper RE: same
kevin@nmappercovey.com	Kevin	Kneupper	6/17/20	Wed	0.2 La Pura	E-mail C. Covey regarding summons; conference with C. Covey regarding same.
kevin@nmappercovey.com	Kevin	Kneupper	6/17/20	Wed	0.2 La Pura	discuss serving complaint with Rapid legal rep and begin entering information on website to begin service; discuss anonymous call received by K Kneupper and quick review of relevant law concerning attorney obligations and disqualification risks
cyclone@nmappercovey.com	Cyclone	Covey	6/18/20	Thu	1.8 La Pura	Conference with C. Covey regarding voice message from "Steven" asking to speak regarding recently filed class action regarding information he may have.
kevin@nmappercovey.com	Kevin	Kneupper	6/19/20	Fri	2.4 La Pura	Review addresses for service; review CA statutes for alternative service when registered agent is not found; emails to process server and K Kneupper RE: same
kevin@nmappercovey.com	Kevin	Kneupper	6/19/20	Fri	0.4 La Pura	address.
kevin@nmappercovey.com	Kevin	Kneupper	6/19/20	Fri	0.6 La Pura	email memo to K Kneupper RE: best course of action to get service on La Pura defendants
cyclone@nmappercovey.com	Cyclone	Covey	6/20/20	Sat	0.8 La Pura	Research cases discussing service under Section 1758.5 and email memo RE: same to K Kneupper
cyclone@nmappercovey.com	Cyclone	Covey	6/21/20	Sun	0.8 La Pura	Phone call w E Spector RE: accepting service; phone call with K Kneupper RE: same; phone calls and email with Rapid Legal rep and continue to enter data for service
cyclone@nmappercovey.com	Cyclone	Covey	6/22/20	Mon	0.9 La Pura	Conference with C. Covey regarding service of process issues for E. Spector; e-mail D. Wright and J. Sacher regarding waiver of service for QuickBox and Konnective defendants.
kevin@nmappercovey.com	Kevin	Kneupper	6/23/20	Tue	0.4 La Pura	Complete entry of information in Rapid Legal for all Spector defendants, re-check CA SOS website to ensure Spector is still registered agent for the 64 defendants, complete service order.
kevin@nmappercovey.com	Kevin	Kneupper	6/24/20	Wed	0.1 La Pura	E-mail process server regarding service on E. Spector.
kevin@nmappercovey.com	Kevin	Kneupper	6/25/20	Thu	0.1 La Pura	E-mail C. Covey regarding filing proof of service.
kevin@nmappercovey.com	Kevin	Kneupper	7/1/20	Wed	1.4 La Pura	Draft CLRA Letter; e-mail C. Covey regarding same.
kevin@nmappercovey.com	Kevin	Kneupper	7/13/20	Fri	0.1 La Pura	Review notice of service and e-mail S. Garcia regarding filing.
kevin@nmappercovey.com	Kevin	Kneupper	7/19/20	Thu	0.2 La Pura	Conference with C. Covey and attorneys for Konnective regarding agreement on service waiver and response time.
TOTAL					287.87	

Exhibit 5

Account Transactions

Kneupper & Covey PC
For the period August 1, 2018 to December 19, 2024

La Pura - Tan v Quickbox

Date	Source	Description	Classification	Reference	Debit	Credit	Gross Account	Related account
29 Feb 2020	Payable Invoice	Montage Legal Group	Messenger	9791	2,759.00	0.00	2,759.00 Outsourced Legal Services	2000 - Accounts Payable
31 Mar 2020	Payable Invoice	Montage Legal Group	Messenger	10025	2,309.50	0.00	2,309.50 Outsourced Legal Services	2000 - Accounts Payable
12 Jun 2020	Spend Money	California Southern District Court	Filing Fee		400.00	0.00	400.00 Court Costs	Cyclone Citi Chairman
26 Jun 2020	Payable Invoice	Rapid Legal	Messenger		413.00	0.00	413.00 PI/Service of Process	Cyclone Citi Chairman
26 Jun 2020	Spend Money	Rapid Legal	Messenger		1,652.00	0.00	1,652.00 PI/Service of Process	Cyclone Citi Chairman
26 Jun 2020	Spend Money	Rapid Legal	Messenger		495.60	0.00	495.60 PI/Service of Process	Cyclone Citi Chairman
26 Jun 2020	Spend Money	Rapid Legal	Messenger		1,652.00	0.00	1,652.00 PI/Service of Process	Cyclone Citi Chairman
29 Jun 2020	Spend Money	Rapid Legal - Serving Legal Papers	Messenger	multi	991.20	0.00	991.20 PI/Service of Process	Cyclone Citi Chairman
30 Jun 2020	Spend Money	Rapid Legal - Serving Legal Papers	Messenger	3635602-15	82.60	0.00	82.60 PI/Service of Process	Cyclone Citi Chairman
30 Jun 2020	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00 Software & Internet Support	Cyclone Citi Chairman
02 Jul 2020	Payable Invoice	Forensic Investigator - Website Owner	Expert/Consultant	#12885	157.76	0.00	157.76 Agrajog Professional Services	2650 - Tracking Transfers
09 Jul 2020	Spend Money	Rapid Legal - Serving Legal Papers	Messenger	3653906-01,3653906-02	340.72	0.00	340.72 PI/Service of Process	Cyclone Citi Chairman
15 Jul 2020	Payable Invoice	Nationwide Legal, LLC	Messenger	19383	30.00	0.00	30.00 Outsourced Legal Services	2000 - Accounts Payable
28 Jul 2020	Payable Invoice	Suzy Garcia	Postage	Reimbursement	497.00	0.00	497.00 Postage	2000 - Accounts Payable
29 Jul 2020	Spend Money	Rapid Legal - Serving Legal Papers	Messenger		320.08	0.00	320.08 PI/Service of Process	Cyclone Citi Chairman
31 Jul 2020	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00 Software & Internet Support	Cyclone Citi Chairman
31 Aug 2020	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00 Software & Internet Support	Cyclone Citi Chairman
15 Sep 2020	Spend Money	Clark County Courts	Filing Fee		2.08	0.00	2.08 Court Costs	Cyclone Citi Chairman
15 Sep 2020	Spend Money	Clark County Courts	Filing Fee		69.50	0.00	69.50 Court Costs	Cyclone Citi Chairman
06 Oct 2020	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00 Software & Internet Support	Cyclone Citi Chairman
31 Oct 2020	Payable Invoice	Integrity Legal Corp. of Orange County	Messenger	OC 225658	632.38	0.00	632.38 Office Expenses	2000 - Accounts Payable
01 Nov 2020	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00 Software & Internet Support	Cyclone Citi Chairman
25 Nov 2020	Spend Money	FedEx	Overnight		37.00	0.00	37.00 Postage	Cyclone Citi Chairman
30 Nov 2020	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00 Software & Internet Support	Cyclone Citi Chairman
31 Dec 2020	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00 Software & Internet Support	Cyclone Citi Chairman
31 Jan 2021	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00 Software & Internet Support	Cyclone Citi Chairman
01 Mar 2021	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00 Software & Internet Support	Cyclone Citi Chairman
12 Mar 2021	Payable Invoice	Andrea Calise Reed - Rule 11 - Tan v Quickbox	Expert/Consultant	Contractor Payment	362.50	0.00	362.50 Contract Labor	2000 - Accounts Payable
29 Mar 2021	Payable Invoice	Andrea Calise Reed - La Pura - Tan v Quickbox	Expert/Consultant	Contractor Payment	549.00	0.00	549.00 Contract Labor	2000 - Accounts Payable
29 Mar 2021	Payable Invoice	Andrea Calise Reed - Rule 11 - Tan v Quickbox	Expert/Consultant	Contractor Payment	2,766.50	0.00	2,766.50 Contract Labor	2000 - Accounts Payable
01 Apr 2021	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00 Software & Internet Support	Cyclone Citi Chairman
01 May 2021	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00 Software & Internet Support	Cyclone Citi Chairman
01 Jun 2021	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00 Software & Internet Support	Cyclone Citi Chairman
01 Jul 2021	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00 Software & Internet Support	Amex Blue Business Cash
01 Aug 2021	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00 Software & Internet Support	Amex Blue Business Cash
01 Sep 2021	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00 Software & Internet Support	Amex Blue Business Cash
13 Sep 2021	Payable Invoice	Integrity Legal Corp. of Orange County - For La Pura	Messenger	OC 226404	72.73	0.00	72.73 Office Expenses	2000 - Accounts Payable
17 Sep 2021	Spend Money	FedEx - US District Court, San Diego, CA	Overnight	423887203	16.96	0.00	16.96 Postage	Amex Blue Business Cash
01 Oct 2021	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00 Software & Internet Support	Amex Blue Business Cash
13 Oct 2021	Payable Invoice	Agrajog Lives, LLC - Reimbursement for amount paid to Suzy for Mailing out discovery for La Pura	Postage	INV-1007A	35.48	0.00	35.48 Postage	2000 - Accounts Payable
15 Oct 2021	Payable Invoice	Nationwide Legal, LLC	Messenger	00000035286	119.05	0.00	119.05 PI/Service of Process	2000 - Accounts Payable
31 Oct 2021	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00 Software & Internet Support	Amex Blue Business Cash
30 Nov 2021	Payable Invoice	Nationwide Legal, LLC - La Pura Bankruptcy Matter	Messenger	00000036658	457.55	0.00	457.55 PI/Service of Process	2000 - Accounts Payable
06 Dec 2021	Spend Money	UPS - Scanning/Printing/Notarizing	Photocopies		5.00	0.00	5.00 Office Expenses	Amex Blue Business Cash
08 Dec 2021	Spend Money	UPS - Scanning/Printing/Notarizing	Photocopies		16.62	0.00	16.62 Office Expenses	Amex Blue Business Cash
15 Dec 2021	Payable Invoice	Nationwide Legal, LLC - La Pura Bankruptcy Matter	Messenger	00000037341	664.30	0.00	664.30 PI/Service of Process	2000 - Accounts Payable
28 Dec 2021	Payable Invoice	Suzy Garcia - 11/17 USPS Receipt	Postage	Reimbursement	45.55	0.00	45.55 Postage	2000 - Accounts Payable
28 Dec 2021	Payable Invoice	Suzy Garcia - 11/19 USPS Receipt	Postage	Reimbursement	148.64	0.00	148.64 Postage	2000 - Accounts Payable
28 Dec 2021	Payable Invoice	Suzy Garcia - 12/6 USPS Receipt	Postage	Reimbursement	41.44	0.00	41.44 Postage	2000 - Accounts Payable
28 Dec 2021	Payable Invoice	Suzy Garcia - 12/8 USPS Receipt	Postage	Reimbursement	185.60	0.00	185.60 Postage	2000 - Accounts Payable
06 Jan 2022	Payable Invoice	Nationwide Legal, LLC - La Pura Bankruptcy Matter	Messenger	00000037761	67.25	0.00	67.25 PI/Service of Process	2000 - Accounts Payable
06 Jan 2022	Payable Invoice	Echo Reporting, Inc. - La Pura Bankruptcy Matter	Stenographer	33480	136.00	0.00	136.00 Litigation Support	2000 - Accounts Payable
10 Feb 2022	Spend Money	Pacer Service Center - 3:20-CV-01082-H	Online Legal Research		0.50	0.00	0.50 Investigations Expense	Amex Blue Business Cash
10 Feb 2022	Spend Money	Pacer Service Center - 8:21-BK-12448-SC	Online Legal Research		28.90	0.00	28.90 Investigations Expense	Amex Blue Business Cash
11 Feb 2022	Payable Invoice	Integrity Legal Corp. of Orange County	Messenger	OC 226450	441.56	0.00	441.56 Litigation Support	2000 - Accounts Payable
11 Feb 2022	Payable Invoice	Integrity Legal Corp. of Orange County	Messenger	OC 226596	187.49	0.00	187.49 Litigation Support	2000 - Accounts Payable
11 Feb 2022	Payable Invoice	Integrity Legal Corp. of Orange County - Total Health Supply	Messenger	OC 226841	202.14	0.00	202.14 Litigation Support	2000 - Accounts Payable
11 Feb 2022	Payable Invoice	Integrity Legal Corp. of Orange County - Total Health Supply	Messenger	OC 226637	78.44	0.00	78.44 Litigation Support	2000 - Accounts Payable
11 Feb 2022	Payable Invoice	Integrity Legal Corp. of Orange County - Total Health Supply	Messenger	OC 226581	93.74	0.00	93.74 Litigation Support	2000 - Accounts Payable
24 Feb 2022	Payable Invoice	Suzy Garcia	Postage	Reimbursement	17.40	0.00	17.40 Postage	2000 - Accounts Payable
08 Mar 2022	Payable Invoice	Suzy Garcia - 9/8 Duplicate - Need to deduct on next reimbursement to Suzy	Postage	Reimbursement	29.20	0.00	29.20 Postage	2000 - Accounts Payable
31 Mar 2022	Payable Invoice	Suzy Garcia - 9/8 Duplicate - Deduction for overpayment on last round	Postage	Reimbursement	0.00	29.20	(29.20) Postage	2000 - Accounts Payable
01 Apr 2022	Payable Invoice	Mazira, LLC	Software	2022020071	61.73	0.00	61.73 Software & Internet Support	2000 - Accounts Payable
30 Apr 2022	Payable Invoice	Nationwide Legal, LLC - Tan V. Quick Box (La Pura)	Messenger	00000042533	215.07	0.00	215.07 PI/Service of Process	2000 - Accounts Payable
01 May 2022	Payable Invoice	Mazira, LLC	Software	2022030113	186.39	0.00	186.39 Software & Internet Support	2000 - Accounts Payable
12 May 2022	Spend Money	USPS - Stamps - Service Copies	Postage	000068	16.82	0.00	16.82 Postage	Amex Blue Business Cash
12 May 2022	Spend Money	USPS - Stamps - Service Copies	Postage	000093	17.40	0.00	17.40 Postage	Amex Blue Business Cash
01 Jun 2022	Payable Invoice	Mazira, LLC	Software	2022040077	227.00	0.00	227.00 Software & Internet Support	2000 - Accounts Payable
03 Jun 2022	Spend Money	USPS - Stamps	Postage	166	58.00	0.00	58.00 Postage	Amex Blue Business Cash
18 Jun 2022	Spend Money	Target - Ream of paper - Suzy could not find the receipt	Photocopies		8.29	0.00	8.29 Office Expenses	Amex Blue Business Cash
20 Jun 2022	Spend Money	USPS - Stamp	Postage	039	0.58	0.00	0.58 Postage	Amex Blue Business Cash
20 Jun 2022	Spend Money	USPS - Stamps	Postage	040	17.40	0.00	17.40 Postage	Amex Blue Business Cash
21 Jun 2022	Spend Money	Staples - Envelopes, Paper & Labels	Postage	27081	46.84	0.00	46.84 Office Expenses	Amex Blue Business Cash
22 Jun 2022	Spend Money	USPS - Stamps	Postage	064	116.00	0.00	116.00 Postage	Amex Blue Business Cash
27 Jun 2022	Spend Money	Empire State Legal Services	Messenger	7256483	250.00	0.00	250.00 PI/Service of Process	Amex Blue Business Cash
01 Jul 2022	Payable Invoice	Mazira, LLC	Software	2022050135	50.29	0.00	50.29 Software & Internet Support	2000 - Accounts Payable
02 Aug 2022	Payable Invoice	Husby Global Litigation	Stenographer	744119	1,256.50	0.00	1,256.50 Litigation Support	2000 - Accounts Payable
22 Aug 2022	Spend Money	Int Archive Inc.	Expert/Consultant		350.00	0.00	350.00 Investigations Expense	Kneupper & Covey Chase
29 Aug 2022	Payable Invoice	Sprint Process LLC - For service of both Subpoenas - to Geoffrey Clapp and Jeremy Sistrunk	Messenger	1779	404.00	0.00	404.00 PI/Service of Process	2000 - Accounts Payable
31 Aug 2022	Payable Invoice	Md Florida Court Services LLC	Messenger	20210660	68.00	0.00	68.00 PI/Service of Process	2000 - Accounts Payable
01 Sep 2022	Payable Invoice	Brandywine Process Servers, Ltd.	Messenger	4969	79.00	0.00	79.00 PI/Service of Process	2000 - Accounts Payable

05 Sep 2022	Payable Invoice	Veritext, LLC	Stenographer	5932320	395.24	0.00	395.24	Litigation Support	2000 - Accounts Payable
07 Sep 2022	Spend Money	CVS - LeAnne Tan Deposition - per kevin(he could not find the receipt)	Meals/Hotel/Transportation		3.74	0.00	3.74	Travel Expenses	Amex Blue Business Cash
12 Sep 2022	Spend Money	Mendocino Farms - LeAnne Tan deposition	Meals/Hotel/Transportation		28.87	0.00	28.87	Travel Expenses	Amex Blue Business Cash
13 Sep 2022	Spend Money	Mid Florida Court Services LLC	Messenger	20210667	90.00	0.00	90.00	PI/Service of Process	Amex Blue Business Cash
15 Sep 2022	Spend Money	USPS - POS to Sistrunk	Postage	028	0.84	0.00	0.84	Postage	Amex Blue Business Cash
15 Sep 2022	Spend Money	USPS - RFPs	Postage	028	4.20	0.00	4.20	Postage	Amex Blue Business Cash
16 Sep 2022	Spend Money	Regus Management Group	Stenographer		176.40	0.00	176.40	Litigation Support	K&C Chase CC
27 Sep 2022	Payable Invoice	Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of David H. Press	Stenographer	A22091709	2,013.30	0.00	2,013.30	Litigation Support	2000 - Accounts Payable
30 Sep 2022	Payable Invoice	Nationwide Legal, LLC - Tan v. Quickbox	Messenger	0000048030	163.00	0.00	163.00	Litigation Support	2000 - Accounts Payable
04 Oct 2022	Payable Invoice	Elizabeth Gallo Court Reporting, LLC	Stenographer	114050	2,143.56	0.00	2,143.56	Litigation Support	2000 - Accounts Payable
05 Oct 2022	Payable Invoice	Nationwide Legal, LLC - Tan v. Quickbox	Messenger	0000048489	482.00	0.00	482.00	PI/Service of Process	2000 - Accounts Payable
10 Oct 2022	Payable Invoice	Suzy Garcia - Stamps	Postage		75.00	0.00	75.00	Postage	2000 - Accounts Payable
10 Oct 2022	Payable Invoice	Suzy Garcia - Stamps	Reimbursement		8.40	0.00	8.40	Postage	2000 - Accounts Payable
10 Oct 2022	Payable Invoice	Verbatim Court Reporters, Inc.	Stenographer	22-LMS-195	1,128.00	0.00	1,128.00	Litigation Support	2000 - Accounts Payable
12 Oct 2022	Payable Invoice	Legal Technology Services, Inc.	Expert/Consultant	30551	1,644.75	0.00	1,644.75	Litigation Support	2000 - Accounts Payable
17 Oct 2022	Payable Invoice	Narrow Path Investigations	Expert/Consultant	1100	239.24	0.00	239.24	PI/Service of Process	2000 - Accounts Payable
19 Oct 2022	Payable Invoice	Integrity Legal Corp. of Orange County - Tan v. Quickbox et al.	Messenger	OC 227422	100.85	0.00	100.85	Litigation Support	2000 - Accounts Payable
21 Oct 2022	Spend Money	FedEx - USDC Southern District of CA	Overnight	553190108	20.85	0.00	20.85	Postage	Amex Blue Business Cash
31 Oct 2022	Payable Invoice	Nationwide Legal, LLC - Tan v. Quickbox	Messenger	0000049658	77.15	0.00	77.15	Litigation Support	2000 - Accounts Payable
01 Nov 2022	Payable Invoice	AAllen Bryant & Associates, Inc. - Sling ADS LLC - Service of Subpoenas	Messenger	2017873	173.30	0.00	173.30	PI/Service of Process	2000 - Accounts Payable
08 Nov 2022	Spend Money	USPS - CLRA Letter	Postage	282	7.85	0.00	7.85	Postage	Amex Blue Business Cash
08 Nov 2022	Spend Money	USPS - CLRA Letter	Postage	282	7.85	0.00	7.85	Postage	Amex Blue Business Cash
08 Nov 2022	Spend Money	USPS - CLRA Letter	Postage	282	7.85	0.00	7.85	Postage	Amex Blue Business Cash
08 Nov 2022	Spend Money	USPS - CLRA Letter	Postage	282	7.85	0.00	7.85	Postage	Amex Blue Business Cash
10 Nov 2022	Payable Invoice	Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Shaun Lavelle	Stenographer	A22110652	1,172.60	0.00	1,172.60	Litigation Support	2000 - Accounts Payable
15 Nov 2022	Spend Money	FedEx - USDC Southern District of CA - San Diego, CA	Overnight	555481096	23.72	0.00	23.72	Postage	Amex Blue Business Cash
21 Nov 2022	Spend Money	Georgia Northern District Court - motion to quash filing	Filing Fee	AGANDC-12213350	45.00	0.00	45.00	Court Costs	Amex Blue Business Cash
21 Nov 2022	Payable Invoice	Judicate West	Mediation	591158	6,378.00	0.00	6,378.00	Mediation Costs	2000 - Accounts Payable
22 Nov 2022	Payable Invoice	Cyclone Covey - Flight - Dec 2022 LA Trip	Meals/Hotel/Transportation		797.20	0.00	797.20	Travel Expenses	2000 - Accounts Payable
22 Nov 2022	Payable Invoice	Integrity Legal Corp. of Orange County - Tan v. Quick Box, LLC, et	Messenger	OC 227514	57.00	0.00	57.00	Litigation Support	2000 - Accounts Payable
22 Nov 2022	Spend Money	Staples - Envelopes & toner	Photocopies		56.17	0.00	56.17	Office Expenses	Amex Blue Business Cash
05 Dec 2022	Payable Invoice	Nationwide Legal, LLC - TAN V. QUICK BOX	Messenger	0000050844	231.00	0.00	231.00	PI/Service of Process	2000 - Accounts Payable
05 Dec 2022	Payable Invoice	Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Leanne Tan	Stenographer	A22100198	1,876.13	0.00	1,876.13	Litigation Support	2000 - Accounts Payable
06 Dec 2022	Payable Invoice	Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Jonathan Trivelas	Stenographer	A22120270	1,416.16	0.00	1,416.16	Litigation Support	2000 - Accounts Payable
12 Dec 2022	Spend Money	Peachy Airport Parking - La Pura	Meals/Hotel/Transportation	PHJ-IndoorElectric-335436	57.00	0.00	57.00	Travel Expenses	Amex Blue Business Cash
14 Dec 2022	Spend Money	Delta Air Lines - Wi-fi	Meals/Hotel/Transportation		5.00	0.00	5.00	Travel Expenses	Amex Blue Business Cash
14 Dec 2022	Spend Money	Katsuya	Meals/Hotel/Transportation		353.19	0.00	353.19	Travel Expenses	Amex Blue Business Cash
14 Dec 2022	Spend Money	Uber	Meals/Hotel/Transportation		54.03	0.00	54.03	Travel Expenses	Amex Blue Business Cash
14 Dec 2022	Payable Invoice	Huseby Global Litigation - Leanne Tan et al., vs. Quick Box LLC	Stenographer	734734	1,029.12	0.00	1,029.12	Litigation Support	2000 - Accounts Payable
14 Dec 2022	Payable Invoice	Huseby Global Litigation - Leanne Tan et al., vs. Quick Box LLC	Stenographer	735029	1,044.84	0.00	1,044.84	Litigation Support	2000 - Accounts Payable
15 Dec 2022	Spend Money	Beverly Hills Parking - Tan v. quickbox - per kevin(He could not find the receipts)	Meals/Hotel/Transportation		5.00	0.00	5.00	Travel Expenses	Amex Blue Business Cash
15 Dec 2022	Spend Money	Tatel	Meals/Hotel/Transportation		428.63	0.00	428.63	Travel Expenses	Amex Blue Business Cash
15 Dec 2022	Spend Money	Uber	Meals/Hotel/Transportation		36.69	0.00	36.69	Travel Expenses	Amex Blue Business Cash
16 Dec 2022	Spend Money	Loews Hotels	Meals/Hotel/Transportation		719.94	0.00	719.94	Travel Expenses	Amex Blue Business Cash
16 Dec 2022	Spend Money	Uber	Meals/Hotel/Transportation		42.37	0.00	42.37	Travel Expenses	Amex Blue Business Cash
21 Dec 2022	Payable Invoice	Judicate West	Mediation	583571	600.00	0.00	600.00	Mediation Costs	2000 - Accounts Payable
31 Dec 2022	Spend Money	Deadlines On Demand	Software	December 2022	15.00	0.00	15.00	Software & Internet Support	K&C Chase CC
01 Jan 2023	Payable Invoice	Mazira, LLC	Messenger	2022110134	15.02	0.00	15.02	Software & Internet Support	2000 - Accounts Payable
04 Jan 2023	Payable Invoice	Nationwide Legal, LLC - TAN V. QUICK BOX	Messenger	NWLS1751-01	52.50	0.00	52.50	Litigation Support	2000 - Accounts Payable
05 Jan 2023	Spend Money	Georgia Northern District Court	Filing Fee	AGANDC-12299270	49.00	0.00	49.00	Court Costs	Amex Blue Business Cash
18 Jan 2023	Payable Invoice	Sprint Process LLC - For service to Jeremy Sistrunk	Messenger	2132	105.00	0.00	105.00	PI/Service of Process	2000 - Accounts Payable
31 Jan 2023	Payable Invoice	Nationwide Legal, LLC - Tan v. Quick Box, LLC	Messenger	0000053168	77.00	0.00	77.00	Litigation Support	2000 - Accounts Payable
01 Feb 2023	Payable Invoice	Mazira, LLC	Software	2023000047	25.00	0.00	25.00	Software & Internet Support	2000 - Accounts Payable
09 Feb 2023	Spend Money	FedEx - United States District Court - San Diego, CA	Overnight	564753250	26.80	0.00	26.80	Postage	Amex Blue Business Cash
01 Mar 2023	Spend Money	Deadlines On Demand	Software	February 2023	15.00	0.00	15.00	Software & Internet Support	K&C Chase CC
01 Mar 2023	Payable Invoice	Mazira, LLC	Software	2023010710	0.68	0.00	0.68	Software & Internet Support	2000 - Accounts Payable
03 Apr 2023	Spend Money	Deadlines On Demand	Software	March 2023	15.00	0.00	15.00	Software & Internet Support	K&C Chase CC
26 Apr 2023	Payable Invoice	USA Express Legal & Investigative Services, Inc.	Messenger	PS313423	225.00	0.00	225.00	PI/Service of Process	2000 - Accounts Payable
26 Apr 2023	Payable Invoice	USA Express Legal & Investigative Services, Inc.	Messenger	PS313571	125.00	0.00	125.00	PI/Service of Process	2000 - Accounts Payable
03 May 2023	Payable Invoice	Nationwide Legal, LLC - VerticalOps.com c/o David Lee	Messenger	NWL52995-01	52.50	0.00	52.50	Litigation Support	2000 - Accounts Payable
06 May 2023	Spend Money	Pacer Service Center	Online Legal Research		3.20	0.00	3.20	Investigations Expense	Amex Blue Business Cash
11 May 2023	Spend Money	Regus	Stenographer	2394-27158	346.50	0.00	346.50	Office Rent	Amex Blue Business Cash
04 Jun 2023	Spend Money	Deadlines On Demand	Software	May 2023	15.00	0.00	15.00	Software & Internet Support	K&C Chase CC
19 Jun 2023	Payable Invoice	LV Investigations Inc. dba Action Process Service of NV	Messenger	9005343	80.00	0.00	80.00	PI/Service of Process	2000 - Accounts Payable
20 Jun 2023	Payable Invoice	Sprint Process LLC - For service to Justin Reviea & Jared Hall	Messenger	2433	190.00	0.00	190.00	PI/Service of Process	2000 - Accounts Payable
28 Jun 2023	Payable Invoice	LV Investigations Inc. dba Action Process Service of NV - for the sub-service of the Doc Subpoena on Janelle Zuniga in La Pura	Messenger	9080754	80.00	0.00	80.00	PI/Service of Process	2000 - Accounts Payable
30 Jun 2023	Spend Money	Athens Parking	Meals/Hotel/Transportation		20.00	0.00	20.00	Travel Expenses	K&C Chase CC
13 Jul 2023	Spend Money	FedEx - Fulton County Sheriffs Department - Atlanta, GA	Overnight	579596682	27.41	0.00	27.41	Postage	Amex Blue Business Cash
14 Jul 2023	Payable Invoice	Elizabeth Gallo Court Reporting, LLC - LeAnne Tan v. Jeremy Sistrunk	Stenographer	123054	2,300.46	0.00	2,300.46	Litigation Support	2000 - Accounts Payable
17 Jul 2023	Payable Invoice	Judicate West	Mediation	602307	9,375.00	0.00	9,375.00	Mediation Costs	2000 - Accounts Payable
18 Jul 2023	Payable Invoice	Huseby Global Litigation - Leanne Tan, et al. v. Quick Box LLC	Stenographer	800907	899.00	0.00	899.00	Litigation Support	2000 - Accounts Payable
18 Jul 2023	Payable Invoice	Huseby Global Litigation - Leanne Tan, et al. v. Quick Box LLC	Stenographer	800576	1,326.95	0.00	1,326.95	Litigation Support	2000 - Accounts Payable
21 Jul 2023	Spend Money	Staples - Kevin	Photocopies		21.54	0.00	21.54	Office Expenses	Amex Blue Business Cash
22 Jul 2023	Spend Money	Ace Parking - La Pura (Discovery Hearing)	Meals/Hotel/Transportation		30.00	0.00	30.00	Travel Expenses	Amex Blue Business Cash
22 Jul 2023	Spend Money	Hotel Tonight - La Pura (Discovery Hearing)	Meals/Hotel/Transportation		408.00	0.00	408.00	Travel Expenses	Amex Blue Business Cash
23 Jul 2023	Spend Money	The Guild Hotel - La Pura (Discovery Hearing)	Meals/Hotel/Transportation		8.03	0.00	8.03	Travel Expenses	Amex Blue Business Cash
23 Jul 2023	Spend Money	The Guild Hotel - La Pura (Discovery Hearing)	Meals/Hotel/Transportation		39.45	0.00	39.45	Travel Expenses	Amex Blue Business Cash
29 Jul 2023	Spend Money	Air BNB	Meals/Hotel/Transportation	ROD8WTKHN8	406.29	0.00	406.29	Travel Expenses	Amex Blue Business Cash
01 Aug 2023	Spend Money	Peachy Airport Parking - La Pura	Meals/Hotel/Transportation		60.00	0.00	60.00	Travel Expenses	Amex Blue Business Cash
02 Aug 2023	Spend Money	Uber	Meals/Hotel/Transportation		18.99	0.00	18.99	Travel Expenses	Amex Blue Business Cash
03 Aug 2023	Spend Money	Plaza Tower - La Pura (Mediation) - Kevin	Meals/Hotel/Transportation		10.50	0.00	10.50	Travel Expenses	Amex Blue Business Cash
03 Aug 2023	Spend Money	Vaca	Meals/Hotel/Transportation		358.53	0.00	358.53	Travel Expenses	Amex Blue Business Cash
04 Aug 2023	Spend Money	LAZ Parking - La Pura (Mediation) - Kevin	Meals/Hotel/Transportation		9.00	0.00	9.00	Travel Expenses	Amex Blue Business Cash
04 Aug 2023	Spend Money	Metro Bean Cafe	Meals/Hotel/Transportation		13.90	0.00	13.90	Travel Expenses	Amex Blue Business Cash
04 Aug 2023	Spend Money	Robata Wasa	Meals/Hotel/Transportation		140.53	0.00	140.53	Travel Expenses	Amex Blue Business Cash
04 Aug 2023	Spend Money	Uber	Meals/Hotel/Transportation		29.90	0.00	29.90	Travel Expenses	Amex Blue Business Cash
04 Aug 2023	Spend Money	FedEx - Fulton County Sheriffs Dept - Atlanta, GA	Overnight	581604694	27.59	0.00	27.59	Postage	Amex Blue Business Cash
05 Aug 2023	Spend Money	Hudson News	Meals/Hotel/Transportation		4.69	0.00	4.69	Travel Expenses	Amex Blue Business Cash
08 Aug 2023	Payable Invoice	Cyclone Covey - Flight Ticket - 8/2-8/4	Meals/Hotel/Transportation		1,417.80	0.00	1,417.80	Travel Expenses	2000 - Accounts Payable
08 Aug 2023	Spend Money	GMass, Inc.	Software	Reimbursement in_1ncemOfXq7EiSInCtZteKj	29.95	0.00	29.95	Software & Internet Support	Amex Blue Business Cash

08 Aug 2023	Spend Money	Twilio Inc.	Software	INV12330266	72.54	0.00	72.54	Software & Internet Support	Amex Blue Business Cash
21 Aug 2023	Payable Invoice	Judicate West	Mediation	605393	4,500.00	0.00	4,500.00	Mediation Costs	2000 - Accounts Payable
30 Aug 2023	Spend Money	ABC Legal - LEANNE TAN v QUICK BOX LLC., ET AL	Messenger	14964207.100	85.00	0.00	85.00	PI/Service of Process	Amex Blue Business Cash
30 Aug 2023	Spend Money	FedEx	Overnight	584080548	24.16	0.00	24.16	Postage	Amex Blue Business Cash
31 Aug 2023	Payable Invoice	Suzy Garcia - Reimbursement for J Hall Subpoena - Money Order(USPS)	Postage	Reimbursement	13.00	0.00	13.00	PI/Service of Process	2000 - Accounts Payable
06 Sep 2023	Payable Invoice	LitiCourt Corporation - Leanne Tan vs. Konnektive Rewards, LLC, et al.	Stenographer	12596	1,142.50	0.00	1,142.50	Litigation Support	2000 - Accounts Payable
07 Sep 2023	Payable Invoice	Nationwide Legal, LLC - Tan v. Quick Box	Messenger	0000059913	222.60	0.00	222.60	Litigation Support	2000 - Accounts Payable
07 Sep 2023	Spend Money	Twilio Inc.	Software	INV12493211	105.12	0.00	105.12	Software & Internet Support	Amex Blue Business Cash
07 Sep 2023	Payable Invoice	LitiCourt Corporation - Leanne Tan vs. Konnektive Rewards, LLC, et al.	Stenographer	12594	2,614.00	0.00	2,614.00	Litigation Support	2000 - Accounts Payable
07 Sep 2023	Payable Invoice	LitiCourt Corporation - Leanne Tan vs. Quick Box, LLC, et al.	Stenographer	11406	837.50	0.00	837.50	Litigation Support	2000 - Accounts Payable
07 Sep 2023	Payable Invoice	LitiCourt Corporation - Leanne Tan vs. Quick Box, LLC, et al.	Stenographer	11381	2,378.45	0.00	2,378.45	Litigation Support	2000 - Accounts Payable
07 Sep 2023	Payable Invoice	LitiCourt Corporation - Leanne Tan vs. Quick Box, LLC, et al.	Stenographer	10786	1,510.05	0.00	1,510.05	Litigation Support	2000 - Accounts Payable
07 Sep 2023	Payable Invoice	LitiCourt Corporation - Leanne Tan vs. Quick Box, LLC, et al.	Stenographer	11573	505.00	0.00	505.00	Litigation Support	2000 - Accounts Payable
08 Sep 2023	Spend Money	GMass, Inc.	Software	in_1NntbtFXq7EiSInCR2MN3JN	29.95	0.00	29.95	Software & Internet Support	Amex Blue Business Cash
08 Sep 2023	Spend Money	GMass, Inc.	Software	in_1Nnuc1FXq7EiSInCNaM5TL2G	42.08	0.00	42.08	Software & Internet Support	Amex Blue Business Cash
12 Sep 2023	Payable Invoice	Cyclone Covey - Flight Ticket - 9/26-9/28	Meals/Hotel/Transportation	Reimbursement	767.80	0.00	767.80	Travel Expenses	2000 - Accounts Payable
25 Sep 2023	Spend Money	PreFlight Parking	Meals/Hotel/Transportation		52.74	0.00	52.74	Travel Expenses	Amex Blue Business Cash
27 Sep 2023	Spend Money	Matisse Bistro	Meals/Hotel/Transportation		51.21	0.00	51.21	Travel Expenses	Amex Blue Business Cash
27 Sep 2023	Spend Money	Uber	Meals/Hotel/Transportation		27.40	0.00	27.40	Travel Expenses	Amex Blue Business Cash
28 Sep 2023	Spend Money	Ace Parking - La Pura (settlement conference)	Meals/Hotel/Transportation		50.00	0.00	50.00	Travel Expenses	Amex Blue Business Cash
28 Sep 2023	Spend Money	Uber	Meals/Hotel/Transportation		49.14	0.00	49.14	Travel Expenses	Amex Blue Business Cash
28 Sep 2023	Spend Money	Uber	Meals/Hotel/Transportation		3.00	0.00	3.00	Travel Expenses	Amex Blue Business Cash
30 Sep 2023	Spend Money	The Guild Hotel	Meals/Hotel/Transportation		642.13	0.00	642.13	Travel Expenses	Amex Blue Business Cash
30 Sep 2023	Spend Money	The Guild Hotel - La Pura (settlement conference) - Kevin	Meals/Hotel/Transportation		573.64	0.00	573.64	Travel Expenses	Amex Blue Business Cash
05 Oct 2023	Payable Invoice	Nationwide Legal, LLC - Tan v. Quick Box, LLC, et al	Messenger	0000060374	52.10	0.00	52.10	Litigation Support	2000 - Accounts Payable
05 Oct 2023	Spend Money	Twilio Inc.	Software	INV12665012	89.95	0.00	89.95	Software & Internet Support	Amex Blue Business Cash
08 Oct 2023	Spend Money	GMass, Inc.	Software		3.50	0.00	3.50	Software & Internet Support	Amex Blue Business Cash
08 Oct 2023	Spend Money	GMass, Inc.	Software	in_1Nyt9FXq7EiSInCJbQJSyf	29.95	0.00	29.95	Software & Internet Support	Amex Blue Business Cash
		QUICK BOX SETTLEMENT SUBTOTAL			83,729.37	29.20	83,700.17		
24 Oct 2023	Spend Money	Uber	Meals/Hotel/Transportation		67.22	0.00	67.22	Travel Expenses	Amex Blue Business Cash
25 Oct 2023	Payable Invoice	Cyclone Covey - Flight change	Meals/Hotel/Transportation	Reimbursement	400.00	0.00	400.00	Travel Expenses	2000 - Accounts Payable
25 Oct 2023	Payable Invoice	Cyclone Covey - La Pura - Tan v Quickbox	Meals/Hotel/Transportation	Reimbursement	737.80	0.00	737.80	Travel Expenses	2000 - Accounts Payable
25 Oct 2023	Spend Money	Interpark	Meals/Hotel/Transportation		39.49	0.00	39.49	Travel Expenses	Amex Blue Business Cash
25 Oct 2023	Spend Money	Uber	Meals/Hotel/Transportation		57.10	0.00	57.10	Travel Expenses	Amex Blue Business Cash
25 Oct 2023	Spend Money	Westford Regency	Meals/Hotel/Transportation		211.11	0.00	211.11	Travel Expenses	Amex Blue Business Cash
26 Oct 2023	Spend Money	UPS - Scanning	Photocopies		35.45	0.00	35.45	Office Expenses	Amex Blue Business Cash
26 Oct 2023	Spend Money	UPS - Scanning	Photocopies		31.24	0.00	31.24	Office Expenses	Amex Blue Business Cash
30 Oct 2023	Payable Invoice	Curt Steven Baker - Retainer for Tan v Quickbox	Expert/Consultant	Retainer	10,000.00	0.00	10,000.00	Prepayments	2000 - Accounts Payable
30 Oct 2023	Payable Invoice	The Varallo Group LLC - Deposition of Alan Kulvete	Stenographer	808200	818.13	0.00	818.13	Litigation Support	2000 - Accounts Payable
06 Nov 2023	Spend Money	Twilio Inc.	Software		89.95	0.00	89.95	Software & Internet Support	Amex Blue Business Cash
08 Nov 2023	Spend Money	GMass, Inc.	Software	in_10A0e4FXq7EiSInCl6zGp4L	11.50	0.00	11.50	Software & Internet Support	Amex Blue Business Cash
10 Nov 2023	Payable Invoice	C.J. Reporting - Original Transcript of Alan Kulvete	Stenographer	808494	750.12	0.00	750.12	Litigation Support	2000 - Accounts Payable
16 Nov 2023	Spend Money	LAZ Parking - Deposition	Meals/Hotel/Transportation		40.00	0.00	40.00	Travel Expenses	K&C Chase CC
17 Nov 2023	Spend Money	Internet Archive Inc	Software	3100181228	450.00	0.00	450.00	Investigations Expense	Kneupper & Covey Chase
30 Nov 2023	Payable Invoice	Huseby Global Litigation - Leanne Tan, et al. v. Quick Box LLC	Stenographer	90030285	1,194.45	0.00	1,194.45	Litigation Support	2000 - Accounts Payable
30 Nov 2023	Payable Invoice	Huseby Global Litigation - Leanne Tan, et al. v. Quick Box LLC	Stenographer	90030289	759.00	0.00	759.00	Litigation Support	2000 - Accounts Payable
04 Dec 2023	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	November 2023	20.00	0.00	20.00	Software & Internet Support	K&C Chase CC
05 Dec 2023	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for November 2023	Expert/Consultant	November 2023	5,460.00	0.00	5,460.00	Outsourced Legal Services	2000 - Accounts Payable
06 Dec 2023	Spend Money	Twilio Inc.	Software	INV13010897	89.95	0.00	89.95	Software & Internet Support	Amex Blue Business Cash
08 Dec 2023	Spend Money	Axiom Forensics - Retainer	Expert/Consultant		7,500.00	0.00	7,500.00	Prepayments	Amex Blue Business Cash
08 Dec 2023	Spend Money	GMass, Inc.	Software	in_10KsvPFXq7EiSInCvqGTh1X	19.95	0.00	19.95	Software & Internet Support	Amex Blue Business Cash
08 Dec 2023	Spend Money	Westford Regency - Deposition of Alan Kulvete on 10/25/23	Stenographer		522.41	0.00	522.41	Office Rent	Amex Blue Business Cash
11 Dec 2023	Payable Invoice	Nationwide Legal, LLC - Tan v. Quick Box, LLC	Messenger	0000064804	47.30	0.00	47.30	Court Costs	2000 - Accounts Payable
11 Dec 2023	Payable Invoice	Huseby Global Litigation - Leanne Tan, et al. v. Quick Box LLC	Stenographer	90032919	1,459.00	0.00	1,459.00	Litigation Support	2000 - Accounts Payable
19 Dec 2023	Payable Invoice	Matthew Groh - expert witness in Tan v Quickbox case	Expert/Consultant		6,500.00	0.00	6,500.00	Prepayments	2000 - Accounts Payable
29 Dec 2023	Spend Money	USPS - for service of Amended Discovery Responses	Postage	732	19.95	0.00	19.95	Postage	Amex Blue Business Cash
04 Jan 2024	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	December 2023	20.00	0.00	20.00	Software & Internet Support	K&C Chase CC
08 Jan 2024	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for December 2023	Expert/Consultant	December 2023	29,867.50	0.00	29,867.50	Expert Witness Expense	2000 - Accounts Payable
08 Jan 2024	Spend Money	GMass, Inc.	Software	in_10W7heFXq7EiSInCmjTHkIH	25.00	0.00	25.00	Software & Internet Support	Amex Blue Business Cash
08 Jan 2024	Spend Money	Twilio Inc.	Software		89.95	0.00	89.95	Software & Internet Support	Amex Blue Business Cash
09 Jan 2024	Payable Invoice	Ronald Mann - Retainer payment - Expert in La Pura	Expert/Consultant		20,000.00	0.00	20,000.00	Prepayments	2000 - Accounts Payable
17 Jan 2024	Spend Money	Ace Parking - La Pura - Depo of Phong Thang	Meals/Hotel/Transportation		10.00	0.00	10.00	Travel Expenses	Amex Blue Business Cash
25 Jan 2024	Spend Money	FedEx - USDC Southern District of CA - San Diego, CA	Overnight	598189064	28.62	0.00	28.62	Postage	Amex Blue Business Cash
04 Feb 2024	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	January 2024	20.00	0.00	20.00	Software & Internet Support	K&C Chase CC
05 Feb 2024	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for January 2024	Expert/Consultant	January 2024	39,455.00	0.00	39,455.00	Expert Witness Expense	2000 - Accounts Payable
06 Feb 2024	Payable Invoice	Nationwide Legal, LLC - Tan v. Quick Box	Messenger	0000067971	52.20	0.00	52.20	Litigation Support	2000 - Accounts Payable
20 Feb 2024	Payable Invoice	Huseby Global Litigation - Original transcript of Jacob John Martorano & 30(b)(6) Konnektive LLC	Stenographer	90034680	4,134.03	0.00	4,134.03	Litigation Support	2000 - Accounts Payable
21 Feb 2024	Payable Invoice	Matthew Groh - Deduct. Retainer paid on 12/19/23	Expert/Consultant		0.00	6,500.00	(6,500.00)	Prepayments	6170 - Expert Witness Expense, 2000 - Accounts Payable
21 Feb 2024	Payable Invoice	Matthew Groh - expert witness in Tan v Quickbox case	Expert/Consultant		13,650.00	0.00	13,650.00	Expert Witness Expense	1300 - Prepayments, 2000 - Accounts Payable
26 Feb 2024	Payable Invoice	Cyclone Covey - Flight Change - 3/6-3/8/24	Meals/Hotel/Transportation	Reimbursement	52.68	0.00	52.68	Travel Expenses	2000 - Accounts Payable
26 Feb 2024	Payable Invoice	Cyclone Covey - Reimbursement for Tan v Quickbox travel - 3/6-3/8/24	Meals/Hotel/Transportation	Reimbursement	956.20	0.00	956.20	Travel Expenses	2000 - Accounts Payable
28 Feb 2024	Payable Invoice	Axiom Forensics - Deduct retainer paid previously	Expert/Consultant	2286	0.00	7,500.00	(7,500.00)	Prepayments	6170 - Expert Witness Expense, 2000 - Accounts Payable
28 Feb 2024	Payable Invoice	Axiom Forensics - Retainer replenishment	Expert/Consultant	2311	2,500.00	0.00	2,500.00	Prepayments	2000 - Accounts Payable
28 Feb 2024	Payable Invoice	Axiom Forensics - Tan v quickbox	Expert/Consultant	2286	10,060.00	0.00	10,060.00	Expert Witness Expense	1300 - Prepayments, 2000 - Accounts Payable
06 Mar 2024	Spend Money	PreFlight Parking	Meals/Hotel/Transportation		39.49	0.00	39.49	Travel Expenses	Amex Blue Business Cash
07 Mar 2024	Spend Money	Conner's Kitchen	Meals/Hotel/Transportation		44.45	0.00	44.45	Travel Expenses	Amex Blue Business Cash
07 Mar 2024	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	February 2024	20.00	0.00	20.00	Software & Internet Support	K&C Chase CC
08 Mar 2024	Spend Money	Conner's Kitchen	Meals/Hotel/Transportation		28.47	0.00	28.47	Travel Expenses	Amex Blue Business Cash
08 Mar 2024	Spend Money	Lyft	Meals/Hotel/Transportation		33.20	0.00	33.20	Travel Expenses	Amex Blue Business Cash
09 Mar 2024	Spend Money	Courtyard by Marriott	Meals/Hotel/Transportation		386.25	0.00	386.25	Travel Expenses	Amex Blue Business Cash
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Expedite fee - 30(b)(6) Konnektive LLC	Stenographer	90033980	1,244.80	0.00	1,244.80	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Original Transcript - 30(b)(6) Konnektive LLC	Stenographer	90033971	2,736.00	0.00	2,736.00	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Original Transcript & Expedite Fee - Matthew Martorano	Stenographer	90035892	5,786.77	0.00	5,786.77	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Original Transcript and Expedite fee - Kathryn Martorano	Stenographer	90032918	4,457.01	0.00	4,457.01	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Video services - 30(b)(6) Konnektive LLC	Stenographer	90033972	1,575.00	0.00	1,575.00	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Video services - Jacob John Martorano	Stenographer	90034684	1,575.00	0.00	1,575.00	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Video Services - Matthew Martorano	Stenographer	90035899	2,012.50	0.00	2,012.50	Litigation Support	2000 - Accounts Payable
13 Mar 2024	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for February 2024	Expert/Consultant	February 2024	10,205.00	0.00	10,205.00	Expert Witness Expense	2000 - Accounts Payable
20 Mar 2024	Payable Invoice	Axiom Forensics - Merrifield expert deposition in La Pura	Expert/Consultant	000386	1,575.00	0.00	1,575.00	Litigation Support	2000 - Accounts Payable

20 Mar 2024	Payable Invoice	Sprint Process LLC - For service of Deposition Subpoena to Brett Walker	Messenger	3229	130.00	0.00	130.00	PI/Service of Process	2000 - Accounts Payable
22 Mar 2024	Payable Invoice	Paszkiwicz Court Reporting - Deposition of Bernita Jackson	Stenographer	329553	680.00	0.00	680.00	Litigation Support	2000 - Accounts Payable
27 Mar 2024	Payable Invoice	Paszkiwicz Court Reporting - ORIGINAL VIDEO TRANSCRIPT: Deposition of Bernita Jackson	Stenographer	331250	775.70	0.00	775.70	Litigation Support	2000 - Accounts Payable
28 Mar 2024	Payable Invoice	Planet Depos, LLC - TRANSCRIPT WITH INDEX OF: Brian Thomas Hill, Corporate Designee	Stenographer	653809	831.79	0.00	831.79	Litigation Support	2000 - Accounts Payable
28 Mar 2024	Payable Invoice	Planet Depos, LLC - TRANSCRIPT WITH INDEX OF: Kerrie Merrifield	Stenographer	655150	809.75	0.00	809.75	Litigation Support	2000 - Accounts Payable
28 Mar 2024	Payable Invoice	Planet Depos, LLC - VIDEOGRAPHY SERVICES FOR THE DEPOSITION OF:	Stenographer	653810	574.00	0.00	574.00	Litigation Support	2000 - Accounts Payable
01 Apr 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Stenographer	2024022371	9.83	0.00	9.83	Software & Internet Support	2000 - Accounts Payable
01 Apr 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Stenographer	2024022371	3.06	0.00	3.06	Software & Internet Support	2000 - Accounts Payable
03 Apr 2024	Payable Invoice	Ronald Mann - Deduc: Retainer paid on 1/9/2024	Expert/Consultant		0.00	20,000.00	(20,000.00)	Prepayments	6170 - Expert Witness Expense, 2000 - Accounts Payable
03 Apr 2024	Payable Invoice	Ronald Mann - Deposition	Expert/Consultant		6,370.00	0.00	6,370.00	Expert Witness Expense	2000 - Accounts Payable
03 Apr 2024	Payable Invoice	Ronald Mann - Report and preparing for deposition	Expert/Consultant		27,170.00	0.00	27,170.00	Expert Witness Expense	1300 - Prepayments, 2000 - Accounts Payable
04 Apr 2024	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for March 2024	Expert/Consultant		16,380.00	0.00	16,380.00	Expert Witness Expense	2000 - Accounts Payable
04 Apr 2024	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for March 2024 Deposition	Expert/Consultant		3,055.00	0.00	3,055.00	Reimbursable Expense	2000 - Accounts Payable
04 Apr 2024	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software		20.00	0.00	20.00	Software & Internet Support	K&C Chase CC
22 Apr 2024	Payable Invoice	WSG Reporting, LLC - Deposition of Brett Walker	Stenographer	9453	1,291.50	0.00	1,291.50	Litigation Support	2000 - Accounts Payable
23 Apr 2024	Payable Invoice	Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Ronald Joseph Mann	Stenographer	A24041344	1,487.75	0.00	1,487.75	Litigation Support	2000 - Accounts Payable
24 Apr 2024	Payable Invoice	Mediated Negotiations, Inc.	Mediation	5846	20,000.00	0.00	20,000.00	Mediation Costs	2000 - Accounts Payable
27 Apr 2024	Spend Money	PreFlight Parking - Mediation travel	Meals/Hotel/Transportation	N2SUQ3-PFZJ	55.74	0.00	55.74	Travel Expenses	Amex Blue Business Cash
01 May 2024	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for April 2024 Reviewing Deposition	Expert/Consultant		2,730.00	0.00	2,730.00	Reimbursable Expense	2000 - Accounts Payable
01 May 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024032372	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Bruce Strombom - Transcript	Stenographer	13355	2,313.52	0.00	2,313.52	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Bruce Strombom - Video	Stenographer	13357	718.75	0.00	718.75	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Keith S. Lerner - Transcript	Stenographer	13352	2,319.40	0.00	2,319.40	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Keith S. Lerner - Video	Stenographer	13354	433.75	0.00	433.75	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Kevin Killingsworth - Transcript	Stenographer	13364	2,175.21	0.00	2,175.21	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Kevin Killingsworth - Video	Stenographer	13366	671.25	0.00	671.25	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Stephen Craig Mott - Transcript	Stenographer	13367	1,071.75	0.00	1,071.75	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Stephen Craig Mott - Video	Stenographer	13369	267.50	0.00	267.50	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Jonathan Trivelas	Stenographer	A24050047	342.50	0.00	342.50	Litigation Support	2000 - Accounts Payable
02 May 2024	Spend Money	Ace Parking - Per Kevin	Meals/Hotel/Transportation		50.00	0.00	50.00	Travel Expenses	K&C Chase CC
03 May 2024	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	April 2024	20.00	0.00	20.00	Software & Internet Support	K&C Chase CC
09 May 2024	Spend Money	American Airlines - mediation w Konnektive	Meals/Hotel/Transportation		416.20	0.00	416.20	Travel Expenses	Amex Blue Business Cash
10 May 2024	Spend Money	Pacer Service Center - 3:20-CV-01082-LL	Online Legal Research	6129997-Q12024	19.70	0.00	19.70	Investigations Expense	Amex Blue Business Cash
10 May 2024	Spend Money	Pacer Service Center - research for Judge Linda Lopez's trial calendars	Online Legal Research	6129997-Q12024	1.20	0.00	1.20	Investigations Expense	Amex Blue Business Cash
10 May 2024	Spend Money	FedEx - Southern District of California - San Diego, CA	Overnight	607996195	30.73	0.00	30.73	Postage	Amex Blue Business Cash
12 May 2024	Spend Money	FedEx - Tony Piazza - Haiku, HI	Overnight	608187588	63.07	0.00	63.07	Postage	Amex Blue Business Cash
13 May 2024	Payable Invoice	Integrity Legal Corp. of Orange County - for the printing and delivery of Courtesy copies to Hon. Lopez of Dkt Nos. 444-446	Messenger	OC Z28988	489.99	0.00	489.99	Office Expenses	2000 - Accounts Payable
15 May 2024	Payable Invoice	Integrity Legal Corp. of Orange County - for Courtesy copies of Opp to MSJ #2 (436)	Messenger	OC Z28991	216.74	0.00	216.74	Office Expenses	2000 - Accounts Payable
17 May 2024	Spend Money	FedEx - Clark's Office - Hon. Lopez - San Diego, CA	Overnight	608624374	24.36	0.00	24.36	Postage	Amex Blue Business Cash
18 May 2024	Payable Invoice	Cyclone Covey - Reimbursement for Tan v Quickbox travel - 5/21-5/23/24	Meals/Hotel/Transportation	Reimbursement	1,056.20	0.00	1,056.20	Travel Expenses	2000 - Accounts Payable
21 May 2024	Spend Money	Hung Truong - La Pura (mediation)	Meals/Hotel/Transportation		73.81	0.00	73.81	Travel Expenses	Amex Blue Business Cash
22 May 2024	Spend Money	Kokkari Estiatorio	Meals/Hotel/Transportation		281.73	0.00	281.73	Travel Expenses	Amex Blue Business Cash
22 May 2024	Spend Money	McDonald's - La Pura (mediation)	Meals/Hotel/Transportation		6.27	0.00	6.27	Travel Expenses	Amex Blue Business Cash
22 May 2024	Spend Money	Uber	Meals/Hotel/Transportation		72.95	0.00	72.95	Travel Expenses	Amex Blue Business Cash
23 May 2024	Spend Money	Burger Joint - La Pura (mediation)	Meals/Hotel/Transportation		26.05	0.00	26.05	Travel Expenses	Amex Blue Business Cash
23 May 2024	Spend Money	The Barrel Room	Meals/Hotel/Transportation		246.38	0.00	246.38	Travel Expenses	Amex Blue Business Cash
23 May 2024	Spend Money	Uber	Meals/Hotel/Transportation		75.51	0.00	75.51	Travel Expenses	Amex Blue Business Cash
23 May 2024	Payable Invoice	Planet Depos, LLC - Transcript with Index of Joseph Libby	Stenographer	656286	1,252.25	0.00	1,252.25	Litigation Support	2000 - Accounts Payable
23 May 2024	Payable Invoice	Planet Depos, LLC - Videography services for deposition of Joseph Libby	Stenographer	656287	849.00	0.00	849.00	Litigation Support	2000 - Accounts Payable
24 May 2024	Spend Money	Sunset News	Meals/Hotel/Transportation		4.36	0.00	4.36	Travel Expenses	Amex Blue Business Cash
24 May 2024	Spend Money	The J Hotel	Meals/Hotel/Transportation		1,371.93	0.00	1,371.93	Travel Expenses	Amex Blue Business Cash
24 May 2024	Spend Money	The J Hotel	Meals/Hotel/Transportation		35.85	0.00	35.85	Travel Expenses	Amex Blue Business Cash
24 May 2024	Payable Invoice	Planet Depos, LLC - Transcript with Index of Steven Baker, Esquire	Stenographer	657857	894.30	0.00	894.30	Litigation Support	2000 - Accounts Payable
24 May 2024	Payable Invoice	Planet Depos, LLC - Transcript with Index of Tom Chen, Corporate Designee	Stenographer	654098	703.30	0.00	703.30	Litigation Support	2000 - Accounts Payable
24 May 2024	Payable Invoice	Planet Depos, LLC - TRANSCRIPT WITH INDEX OF: Kerrie Merrifield, Volume 2	Stenographer	663866	139.25	0.00	139.25	Litigation Support	2000 - Accounts Payable
24 May 2024	Payable Invoice	Planet Depos, LLC - Videography Services for Deposition of Tom Chen, Corporate Designee	Stenographer	654099	499.00	0.00	499.00	Litigation Support	2000 - Accounts Payable
26 May 2024	Spend Money	John Wayne Airport - Per Kevin	Meals/Hotel/Transportation		48.00	0.00	48.00	Travel Expenses	K&C Chase CC
26 May 2024	Spend Money	Meridien Hotels	Meals/Hotel/Transportation		1,339.16	0.00	1,339.16	Travel Expenses	K&C Chase CC
01 Jun 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024042378	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
04 Jun 2024	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	May 2024	25.00	0.00	25.00	Software & Internet Support	K&C Chase CC
01 Jul 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024052372	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
01 Aug 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024062375	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
08 Aug 2024	Spend Money	GoDaddy	Software	3231332229	12.17	0.00	12.17	Advertising	Amex Blue Business Cash
01 Sep 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024072374	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
01 Oct 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024082374	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
01 Nov 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024092380	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
01 Dec 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024102379	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
					377,036.82	34,029.20	343,007.62		

Minus Quick Box Expenses of \$83,700.17

259,307.45

Exhibit 6

Account Transactions

Kneupper & Covey PC
For the period August 1, 2018 to December 19, 2024

La Pura - Tan v Quickbox

Date	Source	Description	Classification	Reference	Debit	Credit	Gross Account	Related account
02 Jul 2020	Payable Invoice	Forensic Investigator - Website Owner	Expert/Consultant	#12885	157.76	0.00	157.76 Agrajog Professional Services	2650 - Tracking Transfers
12 Mar 2021	Payable Invoice	Andrea Calise Reed - Rule 11 - Tan v Quickbox	Expert/Consultant	Contractor Payment	362.50	0.00	362.50 Contract Labor	2000 - Accounts Payable
29 Mar 2021	Payable Invoice	Andrea Calise Reed - La Pura - Tan v Quickbox	Expert/Consultant	Contractor Payment	549.00	0.00	549.00 Contract Labor	2000 - Accounts Payable
29 Mar 2021	Payable Invoice	Andrea Calise Reed - Rule 11 - Tan v Quickbox	Expert/Consultant	Contractor Payment	2,766.50	0.00	2,766.50 Contract Labor	2000 - Accounts Payable
22 Aug 2022	Spend Money	Int Archive Inc.	Expert/Consultant		350.00	0.00	350.00 Investigations Expense	Kneupper & Covey Chase
12 Oct 2022	Payable Invoice	Legal Technology Services, Inc.	Expert/Consultant	30551	1,644.75	0.00	1,644.75 Litigation Support	2000 - Accounts Payable
17 Oct 2022	Payable Invoice	Narrow Path Investigations	Expert/Consultant	1100	239.24	0.00	239.24 PI/Service of Process	2000 - Accounts Payable
30 Oct 2023	Payable Invoice	Curt Steven Baker - Retainer for Tan v Quickbox	Expert/Consultant	Retainer	10,000.00	0.00	10,000.00 Prepayments	2000 - Accounts Payable
05 Dec 2023	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for November 2023	Expert/Consultant	November 2023	5,460.00	0.00	5,460.00 Outsourced Legal Services	2000 - Accounts Payable
08 Dec 2023	Spend Money	Axiom Forensics - Retainer	Expert/Consultant		7,500.00	0.00	7,500.00 Prepayments	Amex Blue Business Cash
19 Dec 2023	Payable Invoice	Matthew Groh - expert witness in Tan v Quickbox case	Expert/Consultant		6,500.00	0.00	6,500.00 Prepayments	2000 - Accounts Payable
08 Jan 2024	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for December 2023	Expert/Consultant	December 2023	29,867.50	0.00	29,867.50 Expert Witness Expense	2000 - Accounts Payable
09 Jan 2024	Payable Invoice	Ronald Mann - Retainer payment - Expert in La Pura	Expert/Consultant		20,000.00	0.00	20,000.00 Prepayments	2000 - Accounts Payable
05 Feb 2024	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for January 2024	Expert/Consultant	January 2024	39,455.00	0.00	39,455.00 Expert Witness Expense	2000 - Accounts Payable
21 Feb 2024	Payable Invoice	Matthew Groh - Deduct: Retainer paid on 12/19/23	Expert/Consultant		0.00	6,500.00	(6,500.00) Prepayments	6170 - Expert Witness Expense
21 Feb 2024	Payable Invoice	Matthew Groh - expert witness in Tan v Quickbox case	Expert/Consultant		13,650.00	0.00	13,650.00 Expert Witness Expense	1300 - Prepayments, 2000 - Ac
28 Feb 2024	Payable Invoice	Axiom Forensics - Deduct retainer paid previously	Expert/Consultant	2286	0.00	7,500.00	(7,500.00) Prepayments	6170 - Expert Witness Expense
28 Feb 2024	Payable Invoice	Axiom Forensics - Retainer replenishment	Expert/Consultant	2311	2,500.00	0.00	2,500.00 Prepayments	2000 - Accounts Payable
28 Feb 2024	Payable Invoice	Axiom Forensics - Tan v quickbox	Expert/Consultant	2286	10,060.00	0.00	10,060.00 Expert Witness Expense	1300 - Prepayments, 2000 - Ac
13 Mar 2024	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for February 2024	Expert/Consultant	February 2024	10,205.00	0.00	10,205.00 Expert Witness Expense	2000 - Accounts Payable
20 Mar 2024	Payable Invoice	Axiom Forensics - Merrifield expert deposition in La Pura	Expert/Consultant	000386	1,575.00	0.00	1,575.00 Litigation Support	2000 - Accounts Payable
03 Apr 2024	Payable Invoice	Ronald Mann - Deduct: Retainer paid on 1/9/2024	Expert/Consultant	Report and Deposition Prep	0.00	20,000.00	(20,000.00) Prepayments	6170 - Expert Witness Expense
03 Apr 2024	Payable Invoice	Ronald Mann - Deposition	Expert/Consultant	Deposition	6,370.00	0.00	6,370.00 Expert Witness Expense	2000 - Accounts Payable
03 Apr 2024	Payable Invoice	Ronald Mann - Report and preparing for deposition	Expert/Consultant	Report and Deposition Prep	27,170.00	0.00	27,170.00 Expert Witness Expense	1300 - Prepayments, 2000 - Ac
04 Apr 2024	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for March 2024	Expert/Consultant	March 2024	16,380.00	0.00	16,380.00 Expert Witness Expense	2000 - Accounts Payable
04 Apr 2024	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for March 2024 Deposition	Expert/Consultant	March 2024 Deposition	3,055.00	0.00	3,055.00 Reimbursable Expense	2000 - Accounts Payable
01 May 2024	Payable Invoice	Baker Consulting - Consulting Fees in Tan v. Quick Box for April 2024 Reviewing Deposition	Expert/Consultant		2,730.00	0.00	2,730.00 Reimbursable Expense	2000 - Accounts Payable
Expert/Consultant Total					218,547.25	34,000.00	184,547.25	
12 Jun 2020	Spend Money	California Southern District Court	Filing Fee		400.00	0.00	400.00 Court Costs	Cyclone Citi Chairman
15 Sep 2020	Spend Money	Clark County Courts	Filing Fee		2.08	0.00	2.08 Court Costs	Cyclone Citi Chairman
15 Sep 2020	Spend Money	Clark County Courts	Filing Fee		69.50	0.00	69.50 Court Costs	Cyclone Citi Chairman
21 Nov 2022	Spend Money	Georgia Northern District Court - motion to quash filing	Filing Fee	AGANDC-12213350	49.00	0.00	49.00 Court Costs	Amex Blue Business Cash
05 Jan 2023	Spend Money	Georgia Northern District Court	Filing Fee	AGANDC-12299270	49.00	0.00	49.00 Court Costs	Amex Blue Business Cash
Filing Fee Total					569.58	0.00	569.58	
07 Sep 2022	Spend Money	CVS - LeAnne Tan Deposition - per kevin(he could not find the receipt)	Meals/Hotel/Transportation		3.74	0.00	3.74 Travel Expenses	Amex Blue Business Cash
12 Sep 2022	Spend Money	Mendocino Farms - LeAnne Tan deposition	Meals/Hotel/Transportation		28.87	0.00	28.87 Travel Expenses	Amex Blue Business Cash
22 Nov 2022	Payable Invoice	Cyclone Covey - Flight - Dec 2022 LA Trip	Meals/Hotel/Transportation	Reimbursement	797.20	0.00	797.20 Travel Expenses	2000 - Accounts Payable
12 Dec 2022	Spend Money	Peachy Airport Parking - La Pura	Meals/Hotel/Transportation	PHJ-IndoorElectric-335436	57.00	0.00	57.00 Travel Expenses	Amex Blue Business Cash
14 Dec 2022	Spend Money	Delta Air Lines - Wifi	Meals/Hotel/Transportation		5.00	0.00	5.00 Travel Expenses	Amex Blue Business Cash
14 Dec 2022	Spend Money	Katsuya	Meals/Hotel/Transportation		353.19	0.00	353.19 Travel Expenses	Amex Blue Business Cash
14 Dec 2022	Spend Money	Uber	Meals/Hotel/Transportation		54.03	0.00	54.03 Travel Expenses	Amex Blue Business Cash
15 Dec 2022	Spend Money	Beverly Hills Parking - Tan v. quickbox - per kevin(He could not find the receipts)	Meals/Hotel/Transportation		5.00	0.00	5.00 Travel Expenses	Amex Blue Business Cash
15 Dec 2022	Spend Money	Tatel	Meals/Hotel/Transportation		428.63	0.00	428.63 Travel Expenses	Amex Blue Business Cash
15 Dec 2022	Spend Money	Uber	Meals/Hotel/Transportation		36.69	0.00	36.69 Travel Expenses	Amex Blue Business Cash
16 Dec 2022	Spend Money	Loews Hotels	Meals/Hotel/Transportation		719.94	0.00	719.94 Travel Expenses	Amex Blue Business Cash
16 Dec 2022	Spend Money	Uber	Meals/Hotel/Transportation		42.37	0.00	42.37 Travel Expenses	Amex Blue Business Cash
30 Jun 2023	Spend Money	Athena Parking	Meals/Hotel/Transportation		20.00	0.00	20.00 Travel Expenses	K&C Chase CC
22 Jul 2023	Spend Money	Ace Parking - La Pura (Discovery Hearing)	Meals/Hotel/Transportation		30.00	0.00	30.00 Travel Expenses	Amex Blue Business Cash
22 Jul 2023	Spend Money	Hotel Tonight - La Pura (Discovery Hearing)	Meals/Hotel/Transportation		408.00	0.00	408.00 Travel Expenses	Amex Blue Business Cash
23 Jul 2023	Spend Money	The Guild Hotel - La Pura (Discovery Hearing)	Meals/Hotel/Transportation		8.03	0.00	8.03 Travel Expenses	Amex Blue Business Cash
23 Jul 2023	Spend Money	The Guild Hotel - La Pura (Discovery Hearing)	Meals/Hotel/Transportation		39.45	0.00	39.45 Travel Expenses	Amex Blue Business Cash
29 Jul 2023	Spend Money	Air BNB	Meals/Hotel/Transportation	RCD8WTKH8	406.29	0.00	406.29 Travel Expenses	Amex Blue Business Cash
01 Aug 2023	Spend Money	Peachy Airport Parking - La Pura	Meals/Hotel/Transportation		60.00	0.00	60.00 Travel Expenses	Amex Blue Business Cash
02 Aug 2023	Spend Money	Uber	Meals/Hotel/Transportation		16.99	0.00	16.99 Travel Expenses	Amex Blue Business Cash
03 Aug 2023	Spend Money	Plaza Tower - La Pura (Mediation) - Kevin	Meals/Hotel/Transportation		10.50	0.00	10.50 Travel Expenses	Amex Blue Business Cash
03 Aug 2023	Spend Money	Vaca	Meals/Hotel/Transportation		358.53	0.00	358.53 Travel Expenses	Amex Blue Business Cash
04 Aug 2023	Spend Money	LAZ Parking - La Pura (Mediation) - Kevin	Meals/Hotel/Transportation		9.00	0.00	9.00 Travel Expenses	Amex Blue Business Cash
04 Aug 2023	Spend Money	Metro Bean Cafe	Meals/Hotel/Transportation		13.90	0.00	13.90 Travel Expenses	Amex Blue Business Cash
04 Aug 2023	Spend Money	Robata Wasa	Meals/Hotel/Transportation		140.53	0.00	140.53 Travel Expenses	Amex Blue Business Cash
04 Aug 2023	Spend Money	Uber	Meals/Hotel/Transportation		29.90	0.00	29.90 Travel Expenses	Amex Blue Business Cash
05 Aug 2023	Spend Money	Hudson News	Meals/Hotel/Transportation		4.69	0.00	4.69 Travel Expenses	Amex Blue Business Cash
08 Aug 2023	Payable Invoice	Cyclone Covey - Flight Ticket - 8/2-8/4	Meals/Hotel/Transportation	Reimbursement	1,417.80	0.00	1,417.80 Travel Expenses	2000 - Accounts Payable
12 Sep 2023	Payable Invoice	Cyclone Covey - Flight Ticket - 9/26-9/28	Meals/Hotel/Transportation	Reimbursement	767.80	0.00	767.80 Travel Expenses	2000 - Accounts Payable
25 Sep 2023	Spend Money	PreFlight Parking	Meals/Hotel/Transportation		52.74	0.00	52.74 Travel Expenses	Amex Blue Business Cash
27 Sep 2023	Spend Money	Matisse Bistro	Meals/Hotel/Transportation		51.21	0.00	51.21 Travel Expenses	Amex Blue Business Cash
27 Sep 2023	Spend Money	Uber	Meals/Hotel/Transportation		27.40	0.00	27.40 Travel Expenses	Amex Blue Business Cash
28 Sep 2023	Spend Money	Ace Parking - La Pura (settlement conference)	Meals/Hotel/Transportation		50.00	0.00	50.00 Travel Expenses	Amex Blue Business Cash
28 Sep 2023	Spend Money	Uber	Meals/Hotel/Transportation		49.14	0.00	49.14 Travel Expenses	Amex Blue Business Cash
28 Sep 2023	Spend Money	Uber	Meals/Hotel/Transportation		3.00	0.00	3.00 Travel Expenses	Amex Blue Business Cash
30 Sep 2023	Spend Money	The Guild Hotel	Meals/Hotel/Transportation		642.13	0.00	642.13 Travel Expenses	Amex Blue Business Cash
30 Sep 2023	Spend Money	The Guild Hotel - La Pura (settlement conference) - Kevin	Meals/Hotel/Transportation		573.64	0.00	573.64 Travel Expenses	Amex Blue Business Cash
24 Oct 2023	Spend Money	Uber	Meals/Hotel/Transportation		67.22	0.00	67.22 Travel Expenses	Amex Blue Business Cash
25 Oct 2023	Payable Invoice	Cyclone Covey - Flight change	Meals/Hotel/Transportation	Reimbursement	400.00	0.00	400.00 Travel Expenses	2000 - Accounts Payable
25 Oct 2023	Payable Invoice	Cyclone Covey - La Pura - Tan v Quickbox	Meals/Hotel/Transportation	Reimbursement	737.80	0.00	737.80 Travel Expenses	2000 - Accounts Payable
25 Oct 2023	Spend Money	Interpark	Meals/Hotel/Transportation		39.49	0.00	39.49 Travel Expenses	Amex Blue Business Cash

25 Oct 2023	Spend Money	Uber	Meals/Hotel/Transportation		57.10	0.00	57.10	Travel Expenses	Amex Blue Business Cash
25 Oct 2023	Spend Money	Westford Regency	Meals/Hotel/Transportation		211.11	0.00	211.11	Travel Expenses	Amex Blue Business Cash
16 Nov 2023	Spend Money	LAZ Parking - Deposition	Meals/Hotel/Transportation		40.00	0.00	40.00	Travel Expenses	K&C Chase CC
17 Jan 2024	Spend Money	Ace Parking - La Pura - Depo of Phong Thang	Meals/Hotel/Transportation		10.00	0.00	10.00	Travel Expenses	Amex Blue Business Cash
26 Feb 2024	Payable Invoice	Cyclone Covey - Flight Change - 3/6-3/8/24	Meals/Hotel/Transportation	Reimbursement	52.68	0.00	52.68	Travel Expenses	2000 - Accounts Payable
26 Feb 2024	Payable Invoice	Cyclone Covey - Reimbursement for Tan v Quickbox travel - 3/6-3/8/24	Meals/Hotel/Transportation	Reimbursement	956.20	0.00	956.20	Travel Expenses	2000 - Accounts Payable
06 Mar 2024	Spend Money	PreFlight Parking	Meals/Hotel/Transportation		39.49	0.00	39.49	Travel Expenses	Amex Blue Business Cash
07 Mar 2024	Spend Money	Conner's Kitchen	Meals/Hotel/Transportation		44.45	0.00	44.45	Travel Expenses	Amex Blue Business Cash
08 Mar 2024	Spend Money	Conner's Kitchen	Meals/Hotel/Transportation		28.47	0.00	28.47	Travel Expenses	Amex Blue Business Cash
08 Mar 2024	Spend Money	Lyft	Meals/Hotel/Transportation		33.20	0.00	33.20	Travel Expenses	Amex Blue Business Cash
09 Mar 2024	Spend Money	Courtyard by Marriot	Meals/Hotel/Transportation		386.25	0.00	386.25	Travel Expenses	Amex Blue Business Cash
27 Apr 2024	Spend Money	PreFlight Parking - Mediation travel	Meals/Hotel/Transportation	N2SUQ3-PFZJ	55.74	0.00	55.74	Travel Expenses	Amex Blue Business Cash
02 May 2024	Spend Money	Ace Parking - Per Kevin	Meals/Hotel/Transportation		50.00	0.00	50.00	Travel Expenses	K&C Chase CC
09 May 2024	Spend Money	American Airlines - mediation w Konnektive	Meals/Hotel/Transportation		416.20	0.00	416.20	Travel Expenses	Amex Blue Business Cash
18 May 2024	Payable Invoice	Cyclone Covey - Reimbursement for Tan v Quickbox travel - 5/21-5/23/24	Meals/Hotel/Transportation	Reimbursement	1,056.20	0.00	1,056.20	Travel Expenses	2000 - Accounts Payable
21 May 2024	Spend Money	Hung Truong - La Pura (mediation)	Meals/Hotel/Transportation		73.81	0.00	73.81	Travel Expenses	Amex Blue Business Cash
22 May 2024	Spend Money	Kokkari Estiatorio	Meals/Hotel/Transportation		281.73	0.00	281.73	Travel Expenses	Amex Blue Business Cash
22 May 2024	Spend Money	McDonald's - La Pura (mediation)	Meals/Hotel/Transportation		6.27	0.00	6.27	Travel Expenses	Amex Blue Business Cash
22 May 2024	Spend Money	Uber	Meals/Hotel/Transportation		72.95	0.00	72.95	Travel Expenses	Amex Blue Business Cash
23 May 2024	Spend Money	Burger Joint - La Pura (mediation)	Meals/Hotel/Transportation		26.05	0.00	26.05	Travel Expenses	Amex Blue Business Cash
23 May 2024	Spend Money	The Barrel Room	Meals/Hotel/Transportation		246.38	0.00	246.38	Travel Expenses	Amex Blue Business Cash
23 May 2024	Spend Money	Uber	Meals/Hotel/Transportation		75.51	0.00	75.51	Travel Expenses	Amex Blue Business Cash
24 May 2024	Spend Money	Sunset News	Meals/Hotel/Transportation		4.36	0.00	4.36	Travel Expenses	Amex Blue Business Cash
24 May 2024	Spend Money	The J Hotel	Meals/Hotel/Transportation		1,371.93	0.00	1,371.93	Travel Expenses	Amex Blue Business Cash
24 May 2024	Spend Money	The J Hotel	Meals/Hotel/Transportation		35.85	0.00	35.85	Travel Expenses	Amex Blue Business Cash
26 May 2024	Spend Money	John Wayne Airport - Per Kevin	Meals/Hotel/Transportation		48.00	0.00	48.00	Travel Expenses	K&C Chase CC
26 May 2024	Spend Money	Meridien Hotels	Meals/Hotel/Transportation		1,339.16	0.00	1,339.16	Travel Expenses	K&C Chase CC
			Meals/Hotel/Transportation Total		15,985.93	0.00	15,985.93		
21 Nov 2022	Payable Invoice	Judicate West	Mediation	581158	6,375.00	0.00	6,375.00	Mediation Costs	2000 - Accounts Payable
21 Dec 2022	Payable Invoice	Judicate West	Mediation	583571	600.00	0.00	600.00	Mediation Costs	2000 - Accounts Payable
17 Jul 2023	Payable Invoice	Judicate West	Mediation	602307	9,375.00	0.00	9,375.00	Mediation Costs	2000 - Accounts Payable
21 Aug 2023	Payable Invoice	Judicate West	Mediation	605393	4,500.00	0.00	4,500.00	Mediation Costs	2000 - Accounts Payable
24 Apr 2024	Payable Invoice	Mediated Negotiations, Inc.	Mediation	5846	20,000.00	0.00	20,000.00	Mediation Costs	2000 - Accounts Payable
			Mediation Total		40,850.00	0.00	40,850.00		
29 Feb 2020	Payable Invoice	Montage Legal Group	Messenger	9791	2,759.00	0.00	2,759.00	Outsourced Legal Services	2000 - Accounts Payable
31 Mar 2020	Payable Invoice	Montage Legal Group	Messenger	10025	2,309.50	0.00	2,309.50	Outsourced Legal Services	2000 - Accounts Payable
26 Jun 2020	Spend Money	Rapid Legal	Messenger		413.00	0.00	413.00	PI/Service of Process	Cyclone Citi Chairman
26 Jun 2020	Spend Money	Rapid Legal	Messenger		1,652.00	0.00	1,652.00	PI/Service of Process	Cyclone Citi Chairman
26 Jun 2020	Spend Money	Rapid Legal	Messenger		495.60	0.00	495.60	PI/Service of Process	Cyclone Citi Chairman
26 Jun 2020	Spend Money	Rapid Legal	Messenger		1,652.00	0.00	1,652.00	PI/Service of Process	Cyclone Citi Chairman
29 Jun 2020	Spend Money	Rapid Legal - Serving Legal Papers	Messenger	multi	991.20	0.00	991.20	PI/Service of Process	Cyclone Citi Chairman
30 Jun 2020	Spend Money	Rapid Legal - Serving Legal Papers	Messenger	3635602-15	82.60	0.00	82.60	PI/Service of Process	Cyclone Citi Chairman
09 Jul 2020	Spend Money	Rapid Legal - Serving Legal Papers	Messenger	3653906-01,3653906-02	340.72	0.00	340.72	PI/Service of Process	Cyclone Citi Chairman
15 Jul 2020	Payable Invoice	Nationwide Legal, LLC	Messenger	19383	30.00	0.00	30.00	Outsourced Legal Services	2000 - Accounts Payable
29 Jul 2020	Spend Money	Rapid Legal - Serving Legal Papers	Messenger		320.08	0.00	320.08	PI/Service of Process	Cyclone Citi Chairman
31 Oct 2020	Payable Invoice	Integrity Legal Corp. of Orange County	Messenger	OC 225658	632.38	0.00	632.38	Office Expenses	2000 - Accounts Payable
13 Sep 2021	Payable Invoice	Integrity Legal Corp. of Orange County - For La Pura	Messenger	OC 226404	72.73	0.00	72.73	Office Expenses	2000 - Accounts Payable
15 Oct 2021	Payable Invoice	Nationwide Legal, LLC	Messenger	00000035286	119.05	0.00	119.05	PI/Service of Process	2000 - Accounts Payable
30 Nov 2021	Payable Invoice	Nationwide Legal, LLC - La Pura Bankruptcy Matter	Messenger	00000036658	457.55	0.00	457.55	PI/Service of Process	2000 - Accounts Payable
15 Dec 2021	Payable Invoice	Nationwide Legal, LLC - La Pura Bankruptcy Matter	Messenger	00000037341	664.30	0.00	664.30	PI/Service of Process	2000 - Accounts Payable
06 Jan 2022	Payable Invoice	Nationwide Legal, LLC - La Pura Bankruptcy Matter	Messenger	00000037761	67.25	0.00	67.25	PI/Service of Process	2000 - Accounts Payable
11 Feb 2022	Payable Invoice	Integrity Legal Corp. of Orange County	Messenger	OC 226450	441.56	0.00	441.56	Litigation Support	2000 - Accounts Payable
11 Feb 2022	Payable Invoice	Integrity Legal Corp. of Orange County	Messenger	OC 226596	187.49	0.00	187.49	Litigation Support	2000 - Accounts Payable
11 Feb 2022	Payable Invoice	Integrity Legal Corp. of Orange County - Total Health Supply	Messenger	OC 226641	202.14	0.00	202.14	Litigation Support	2000 - Accounts Payable
11 Feb 2022	Payable Invoice	Integrity Legal Corp. of Orange County - Total Health Supply	Messenger	OC 226637	78.44	0.00	78.44	Litigation Support	2000 - Accounts Payable
11 Feb 2022	Payable Invoice	Integrity Legal Corp. of Orange County - Total Health Supply	Messenger	OC 226581	93.74	0.00	93.74	Litigation Support	2000 - Accounts Payable
30 Apr 2022	Payable Invoice	Nationwide Legal, LLC - Tan V. Quick Box (La Pura)	Messenger	00000042533	215.07	0.00	215.07	PI/Service of Process	2000 - Accounts Payable
27 Jun 2022	Spend Money	Empire State Legal Services	Messenger	7256483	250.00	0.00	250.00	PI/Service of Process	Amex Blue Business Cash
29 Aug 2022	Payable Invoice	Sprint Process LLC - For service of both Subpoenas - to Geoffrey Clapp and Jeremy Sistrunk	Messenger	1779	404.00	0.00	404.00	PI/Service of Process	2000 - Accounts Payable
31 Aug 2022	Payable Invoice	Mid Florida Court Services LLC	Messenger	20210660	68.00	0.00	68.00	PI/Service of Process	2000 - Accounts Payable
01 Sep 2022	Payable Invoice	Brandywine Process Servers, Ltd.	Messenger	4969	79.00	0.00	79.00	PI/Service of Process	2000 - Accounts Payable
13 Sep 2022	Spend Money	Mid Florida Court Services LLC	Messenger	20210667	90.00	0.00	90.00	PI/Service of Process	Amex Blue Business Cash
30 Sep 2022	Payable Invoice	Nationwide Legal, LLC - Tan v. Quickbox	Messenger	00000048030	163.00	0.00	163.00	Litigation Support	2000 - Accounts Payable
05 Oct 2022	Payable Invoice	Nationwide Legal, LLC - Tan v. Quickbox	Messenger	00000048489	482.00	0.00	482.00	PI/Service of Process	2000 - Accounts Payable
19 Oct 2022	Payable Invoice	Integrity Legal Corp. of Orange County - Tan v. Quickbox et al.	Messenger	OC 227422	100.85	0.00	100.85	Litigation Support	2000 - Accounts Payable
31 Oct 2022	Payable Invoice	Nationwide Legal, LLC - Tan v. Quickbox	Messenger	00000049658	77.15	0.00	77.15	Litigation Support	2000 - Accounts Payable
01 Nov 2022	Payable Invoice	AAllen Bryant & Associates, Inc. - Sling ADS LLC - Service of Subpoenas	Messenger	2017873	173.30	0.00	173.30	PI/Service of Process	2000 - Accounts Payable
22 Nov 2022	Payable Invoice	Integrity Legal Corp. of Orange County - Tan v. Quick Box, LLC, et	Messenger	OC 227514	57.00	0.00	57.00	Litigation Support	2000 - Accounts Payable
05 Dec 2022	Payable Invoice	Nationwide Legal, LLC - TAN V. QUICK BOX	Messenger	00000050844	231.00	0.00	231.00	PI/Service of Process	2000 - Accounts Payable
04 Jan 2023	Payable Invoice	Nationwide Legal, LLC - TAN V. QUICK BOX	Messenger	NWL51751-01	52.50	0.00	52.50	Litigation Support	2000 - Accounts Payable
18 Jan 2023	Payable Invoice	Sprint Process LLC - For service to Jeremy Sistrunk	Messenger	2132	105.00	0.00	105.00	PI/Service of Process	2000 - Accounts Payable
31 Jan 2023	Payable Invoice	Nationwide Legal, LLC - Tan v. Quick Box, LLC	Messenger	00000053168	77.00	0.00	77.00	Litigation Support	2000 - Accounts Payable
26 Apr 2023	Payable Invoice	USA Express Legal & Investigative Services, Inc.	Messenger	PS313423	225.00	0.00	225.00	PI/Service of Process	2000 - Accounts Payable
26 Apr 2023	Payable Invoice	USA Express Legal & Investigative Services, Inc.	Messenger	PS313571	125.00	0.00	125.00	PI/Service of Process	2000 - Accounts Payable
03 May 2023	Payable Invoice	Nationwide Legal, LLC - VerticalOps.com c/o David Lee	Messenger	NWL52595-01	52.50	0.00	52.50	Litigation Support	2000 - Accounts Payable
19 Jun 2023	Payable Invoice	LV Investigations Inc. dba Action Process Service of NV	Messenger	9005343	80.00	0.00	80.00	PI/Service of Process	2000 - Accounts Payable
20 Jun 2023	Payable Invoice	Sprint Process LLC - For service to Justin Reviea & Jared Hall	Messenger	2433	190.00	0.00	190.00	PI/Service of Process	2000 - Accounts Payable
28 Jun 2023	Payable Invoice	LV Investigations Inc. dba Action Process Service of NV - for the sub-service of the Doc Subpoena on Janelle Zuniga in La Pura Cas	Messenger	9080754	80.00	0.00	80.00	PI/Service of Process	2000 - Accounts Payable
30 Aug 2023	Spend Money	ABC Legal - LEANNE TAN v QUICK BOX LLC., ET AL	Messenger	14964207.100	85.00	0.00	85.00	PI/Service of Process	Amex Blue Business Cash
07 Sep 2023	Payable Invoice	Nationwide Legal, LLC - Tan v. Quick Box	Messenger	00000059913	222.60	0.00	222.60	Litigation Support	2000 - Accounts Payable
05 Oct 2023	Payable Invoice	Nationwide Legal, LLC - Tan v. Quick Box, LLC, et al	Messenger	00000060374	52.10	0.00	52.10	Litigation Support	2000 - Accounts Payable
11 Dec 2023	Payable Invoice	Nationwide Legal, LLC - Tan v. Quick Box, LLC	Messenger	00000064804	47.30	0.00	47.30	Court Costs	2000 - Accounts Payable
06 Feb 2024	Payable Invoice	Nationwide Legal, LLC - Tan v. Quick Box	Messenger	00000067971	52.20	0.00	52.20	Litigation Support	2000 - Accounts Payable

20 Mar 2024	Payable Invoice	Sprint Process LLC - For service of Deposition Subpoena to Brett Walker	Messenger	3229	130.00	0.00	130.00	PI/Service of Process	2000 - Accounts Payable
13 May 2024	Payable Invoice	Integrity Legal Corp. of Orange County - for the printing and delivery of Courtesy copies to Hon. Lopez of Dkt Nos. 444-446	Messenger	OC 228988	489.99	0.00	489.99	Office Expenses	2000 - Accounts Payable
15 May 2024	Payable Invoice	Integrity Legal Corp. of Orange County - for Courtesy copies of Opp to MSJ #2 (436)	Messenger	OC 228991	216.74	0.00	216.74	Office Expenses	2000 - Accounts Payable
			Messenger Total		18,735.63	0.00	18,735.63		
10 Feb 2022	Spend Money	Pacer Service Center - 3:20-CV-01082-H	Online Legal Research		0.50	0.00	0.50	Investigations Expense	Amex Blue Business Cash
10 Feb 2022	Spend Money	Pacer Service Center - 8:21-BK-12448-SC	Online Legal Research		28.90	0.00	28.90	Investigations Expense	Amex Blue Business Cash
06 May 2023	Spend Money	Pacer Service Center	Online Legal Research		3.20	0.00	3.20	Investigations Expense	Amex Blue Business Cash
10 May 2024	Spend Money	Pacer Service Center - 3:20-CV-01082-LL	Online Legal Research	6129997-Q12024	19.70	0.00	19.70	Investigations Expense	Amex Blue Business Cash
10 May 2024	Spend Money	Pacer Service Center - research for Judge Linda Lopez's trial calendars	Online Legal Research	6129997-Q12024	1.20	0.00	1.20	Investigations Expense	Amex Blue Business Cash
			Online Legal Research Total		53.50	0.00	53.50		
25 Nov 2020	Spend Money	FedEx	Overnight		37.00	0.00	37.00	Postage	Cyclone Citi Chairman
17 Sep 2021	Spend Money	FedEx - US District Court, San Diego, CA	Overnight	423887203	16.96	0.00	16.96	Postage	Amex Blue Business Cash
21 Oct 2022	Spend Money	FedEx - USDC Southern District of CA	Overnight	553190108	20.85	0.00	20.85	Postage	Amex Blue Business Cash
15 Nov 2022	Spend Money	FedEx - USDC Southern District of CA - San Diego, CA	Overnight	555481096	23.72	0.00	23.72	Postage	Amex Blue Business Cash
09 Feb 2023	Spend Money	FedEx - United States District Court - San Diego, CA	Overnight	564753250	26.80	0.00	26.80	Postage	Amex Blue Business Cash
13 Jul 2023	Spend Money	FedEx - Fulton County Sheriffs Department - Atlanta, GA	Overnight	579596682	27.41	0.00	27.41	Postage	Amex Blue Business Cash
04 Aug 2023	Spend Money	FedEx - Fulton County Sheriffs Dept - Atlanta, GA	Overnight	581604694	27.59	0.00	27.59	Postage	Amex Blue Business Cash
30 Aug 2023	Spend Money	FedEx	Overnight	584080548	24.16	0.00	24.16	Postage	Amex Blue Business Cash
25 Jan 2024	Spend Money	FedEx - USDC Southern District of CA - San Diego, CA	Overnight	598189064	28.62	0.00	28.62	Postage	Amex Blue Business Cash
10 May 2024	Spend Money	FedEx - Southern District of California - San Diego, CA	Overnight	607996195	30.73	0.00	30.73	Postage	Amex Blue Business Cash
12 May 2024	Spend Money	FedEx - Tony Piazza - Haiku, HI	Overnight	608187588	63.07	0.00	63.07	Postage	Amex Blue Business Cash
17 May 2024	Spend Money	FedEx - Clerk's Office - Hon. Lopez - San Diego, CA	Overnight	608624374	24.36	0.00	24.36	Postage	Amex Blue Business Cash
			Overnight Total		351.27	0.00	351.27		
06 Dec 2021	Spend Money	UPS - Scanning/Printing/Notarizing	Photocopies		5.00	0.00	5.00	Office Expenses	Amex Blue Business Cash
08 Dec 2021	Spend Money	UPS - Scanning/Printing/Notarizing	Photocopies		6.62	0.00	6.62	Office Expenses	Amex Blue Business Cash
18 Jun 2022	Spend Money	Target - Ream of paper - Suzy could not find the receipt	Photocopies		8.29	0.00	8.29	Office Expenses	Amex Blue Business Cash
22 Nov 2022	Spend Money	Staples - Envelopes & toner	Photocopies		56.17	0.00	56.17	Office Expenses	Amex Blue Business Cash
21 Jul 2023	Spend Money	Staples - Kevin	Photocopies		21.54	0.00	21.54	Office Expenses	Amex Blue Business Cash
26 Oct 2023	Spend Money	UPS - Scanning	Photocopies		35.45	0.00	35.45	Office Expenses	Amex Blue Business Cash
26 Oct 2023	Spend Money	UPS - Scanning	Photocopies		31.24	0.00	31.24	Office Expenses	Amex Blue Business Cash
			Photocopies Total		164.31	0.00	164.31		
28 Jul 2020	Payable Invoice	Suzy Garcia	Postage	Reimbursement	497.00	0.00	497.00	Postage	2000 - Accounts Payable
13 Oct 2021	Payable Invoice	Agragg Lives, LLC - Reimbursement for amount paid to Suzy for Mailing out discovery for La Pura	Postage	INV-1007A	35.48	0.00	35.48	Postage	2000 - Accounts Payable
28 Dec 2021	Payable Invoice	Suzy Garcia - 11/17 USPS Receipt	Postage	Reimbursement	45.55	0.00	45.55	Postage	2000 - Accounts Payable
28 Dec 2021	Payable Invoice	Suzy Garcia - 11/19 USPS Receipt	Postage	Reimbursement	148.64	0.00	148.64	Postage	2000 - Accounts Payable
28 Dec 2021	Payable Invoice	Suzy Garcia - 12/6 USPS Receipt	Postage	Reimbursement	41.44	0.00	41.44	Postage	2000 - Accounts Payable
28 Dec 2021	Payable Invoice	Suzy Garcia - 12/8 USPS Receipt	Postage	Reimbursement	185.60	0.00	185.60	Postage	2000 - Accounts Payable
24 Feb 2022	Payable Invoice	Suzy Garcia	Postage	Reimbursement	17.40	0.00	17.40	Postage	2000 - Accounts Payable
08 Mar 2022	Payable Invoice	Suzy Garcia - 9/8 Duplicate - Need to deduct on next reimbursement to Suzy	Postage	Reimbursement	29.20	0.00	29.20	Postage	2000 - Accounts Payable
31 Mar 2022	Payable Invoice	Suzy Garcia - 9/8 Duplicate - Deduction for overpayment on last round	Postage	Reimbursement	0.00	29.20	(29.20)	Postage	2000 - Accounts Payable
12 May 2022	Spend Money	USPS - Stamps - Service Copies	Postage	000068	16.82	0.00	16.82	Postage	Amex Blue Business Cash
12 May 2022	Spend Money	USPS - Stamps - Service Copies	Postage	000093	17.40	0.00	17.40	Postage	Amex Blue Business Cash
03 Jun 2022	Spend Money	USPS - Stamps	Postage	166	58.00	0.00	58.00	Postage	Amex Blue Business Cash
20 Jun 2022	Spend Money	USPS - Stamp	Postage	039	0.58	0.00	0.58	Postage	Amex Blue Business Cash
20 Jun 2022	Spend Money	USPS - Stamps	Postage	040	17.40	0.00	17.40	Postage	Amex Blue Business Cash
21 Jun 2022	Spend Money	Staples - Envelopes, Paper & Labels	Postage	27081	46.84	0.00	46.84	Office Expenses	Amex Blue Business Cash
22 Jun 2022	Spend Money	USPS - Stamps	Postage	064	116.00	0.00	116.00	Postage	Amex Blue Business Cash
15 Sep 2022	Spend Money	USPS - POS to Sistrunk	Postage	028	0.84	0.00	0.84	Postage	Amex Blue Business Cash
15 Sep 2022	Spend Money	USPS - RFPs	Postage	028	4.20	0.00	4.20	Postage	Amex Blue Business Cash
10 Oct 2022	Payable Invoice	Suzy Garcia - Stamps	Postage	Reimbursement	75.00	0.00	75.00	Postage	2000 - Accounts Payable
10 Oct 2022	Payable Invoice	Suzy Garcia - Stamps	Postage	Reimbursement	8.40	0.00	8.40	Postage	2000 - Accounts Payable
08 Nov 2022	Spend Money	USPS - CLRA Letter	Postage	282	7.85	0.00	7.85	Postage	Amex Blue Business Cash
08 Nov 2022	Spend Money	USPS - CLRA Letter	Postage	282	7.85	0.00	7.85	Postage	Amex Blue Business Cash
08 Nov 2022	Spend Money	USPS - CLRA Letter	Postage	282	7.85	0.00	7.85	Postage	Amex Blue Business Cash
08 Nov 2022	Spend Money	USPS - CLRA Letter	Postage	282	7.85	0.00	7.85	Postage	Amex Blue Business Cash
31 Aug 2023	Payable Invoice	Suzy Garcia - Reimbursement for J Hall Subpoena - Money Order(USPS)	Postage	Reimbursement	13.00	0.00	13.00	PI/Service of Process	2000 - Accounts Payable
29 Dec 2023	Spend Money	USPS - for service of Amended Discovery Responses	Postage	732	19.95	0.00	19.95	Postage	Amex Blue Business Cash
			Postage Total		1,426.14	29.20	1,396.94		
30 Jun 2020	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00	Software & Internet Support	Cyclone Citi Chairman
31 Jul 2020	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00	Software & Internet Support	Cyclone Citi Chairman
31 Aug 2020	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00	Software & Internet Support	Cyclone Citi Chairman
06 Oct 2020	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00	Software & Internet Support	Cyclone Citi Chairman
01 Nov 2020	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00	Software & Internet Support	Cyclone Citi Chairman
30 Nov 2020	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00	Software & Internet Support	Cyclone Citi Chairman
31 Dec 2020	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00	Software & Internet Support	Cyclone Citi Chairman
31 Jan 2021	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00	Software & Internet Support	Cyclone Citi Chairman
01 Mar 2021	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00	Software & Internet Support	Cyclone Citi Chairman
01 Apr 2021	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00	Software & Internet Support	Cyclone Citi Chairman
01 May 2021	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00	Software & Internet Support	Cyclone Citi Chairman
01 Jun 2021	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00	Software & Internet Support	Cyclone Citi Chairman
01 Jul 2021	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00	Software & Internet Support	Amex Blue Business Cash
01 Aug 2021	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00	Software & Internet Support	Amex Blue Business Cash
01 Sep 2021	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00	Software & Internet Support	Amex Blue Business Cash
01 Oct 2021	Spend Money	Deadlines On Demand	Software		15.00	0.00	15.00	Software & Internet Support	Amex Blue Business Cash
31 Oct 2021	Spend Money	Deadlines On Demand	Software		20.00	0.00	20.00	Software & Internet Support	Amex Blue Business Cash
01 Apr 2022	Payable Invoice	Mazira, LLC	Software	2022020071	61.73	0.00	61.73	Software & Internet Support	2000 - Accounts Payable
01 May 2022	Payable Invoice	Mazira, LLC	Software	2022030113	186.39	0.00	186.39	Software & Internet Support	2000 - Accounts Payable
01 Jun 2022	Payable Invoice	Mazira, LLC	Software	2022040077	227.00	0.00	227.00	Software & Internet Support	2000 - Accounts Payable
01 Jul 2022	Payable Invoice	Mazira, LLC	Software	2022050135	50.29	0.00	50.29	Software & Internet Support	2000 - Accounts Payable
31 Dec 2022	Spend Money	Deadlines On Demand	Software	December 2022	15.00	0.00	15.00	Software & Internet Support	K&C Chase CC
01 Jan 2023	Payable Invoice	Mazira, LLC	Software	2022110134	15.02	0.00	15.02	Software & Internet Support	2000 - Accounts Payable
01 Feb 2023	Payable Invoice	Mazira, LLC	Software	2023000047	25.00	0.00	25.00	Software & Internet Support	2000 - Accounts Payable
01 Mar 2023	Spend Money	Deadlines On Demand	Software	February 2023	15.00	0.00	15.00	Software & Internet Support	K&C Chase CC

01 Mar 2023	Payable Invoice	Mazira, LLC	Software	2023010710	0.68	0.00	0.68	Software & Internet Support	2000 - Accounts Payable
03 Apr 2023	Spend Money	Deadlines On Demand	Software	March 2023	15.00	0.00	15.00	Software & Internet Support	K&C Chase CC
04 Jun 2023	Spend Money	Deadlines On Demand	Software	May 2023	15.00	0.00	15.00	Software & Internet Support	K&C Chase CC
08 Aug 2023	Spend Money	GMass, Inc.	Software	in_1NcemOFXq7EiSlncIzXtekij	29.95	0.00	29.95	Software & Internet Support	Amex Blue Business Cash
08 Aug 2023	Spend Money	Twilio Inc.	Software	INV12330266	72.54	0.00	72.54	Software & Internet Support	Amex Blue Business Cash
07 Sep 2023	Spend Money	Twilio Inc.	Software	INV12493211	105.12	0.00	105.12	Software & Internet Support	Amex Blue Business Cash
08 Sep 2023	Spend Money	GMass, Inc.	Software	in_1NnbtFXq7EiSlncR2MN3JNn	29.95	0.00	29.95	Software & Internet Support	Amex Blue Business Cash
08 Sep 2023	Spend Money	GMass, Inc.	Software	in_1Nnuc1FXq7EiSlncNaM5TL2G	42.08	0.00	42.08	Software & Internet Support	Amex Blue Business Cash
05 Oct 2023	Spend Money	Twilio Inc.	Software	INV12665012	89.95	0.00	89.95	Software & Internet Support	Amex Blue Business Cash
08 Oct 2023	Spend Money	GMass, Inc.	Software		3.50	0.00	3.50	Software & Internet Support	Amex Blue Business Cash
08 Oct 2023	Spend Money	GMass, Inc.	Software	in_1Nylt9FXq7EiSlncJlbQJSyf	29.95	0.00	29.95	Software & Internet Support	Amex Blue Business Cash
06 Nov 2023	Spend Money	Twilio Inc.	Software		89.95	0.00	89.95	Software & Internet Support	Amex Blue Business Cash
08 Nov 2023	Spend Money	GMass, Inc.	Software	in_10A0e4FXq7EiSlncI6zBp4L	11.50	0.00	11.50	Software & Internet Support	Amex Blue Business Cash
17 Nov 2023	Spend Money	Internet Archive Inc	Software	3100181228	450.00	0.00	450.00	Investigations Expense	Kneupper & Covey Chase
04 Dec 2023	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	November 2023	20.00	0.00	20.00	Software & Internet Support	K&C Chase CC
06 Dec 2023	Spend Money	Twilio Inc.	Software	INV13010897	89.95	0.00	89.95	Software & Internet Support	Amex Blue Business Cash
08 Dec 2023	Spend Money	GMass, Inc.	Software	in_1OKsvPFXq7EiSlncVqGnTh1X	19.95	0.00	19.95	Software & Internet Support	Amex Blue Business Cash
04 Jan 2024	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	December 2023	20.00	0.00	20.00	Software & Internet Support	K&C Chase CC
08 Jan 2024	Spend Money	GMass, Inc.	Software	in_1OW7heFXq7EiSlncJmTTHkIH	25.00	0.00	25.00	Software & Internet Support	Amex Blue Business Cash
08 Jan 2024	Spend Money	Twilio Inc.	Software		89.95	0.00	89.95	Software & Internet Support	Amex Blue Business Cash
04 Feb 2024	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	January 2024	20.00	0.00	20.00	Software & Internet Support	K&C Chase CC
07 Mar 2024	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	February 2024	20.00	0.00	20.00	Software & Internet Support	K&C Chase CC
04 Apr 2024	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	March 2024	20.00	0.00	20.00	Software & Internet Support	K&C Chase CC
01 May 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024092372	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
03 May 2024	Payable Invoice	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	April 2024	20.00	0.00	20.00	Software & Internet Support	K&C Chase CC
01 Jun 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024042378	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
04 Jun 2024	Spend Money	Deadlines On Demand - Tan v Quickbox (La Pura)	Software	May 2024	25.00	0.00	25.00	Software & Internet Support	K&C Chase CC
01 Jul 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024052372	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
01 Aug 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024062375	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
08 Aug 2024	Spend Money	GoDaddy	Software	3231332229	12.17	0.00	12.17	Advertising	Amex Blue Business Cash
01 Sep 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024072374	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
01 Oct 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024082374	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
01 Nov 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024092380	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
01 Dec 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Software	2024102379	38.00	0.00	38.00	Software & Internet Support	2000 - Accounts Payable
			Software Total		2,566.62	0.00	2,566.62		
06 Jan 2022	Payable Invoice	Echo Reporting, Inc. - La Pura Bankruptcy Matter	Stenographer	33480	136.00	0.00	136.00	Litigation Support	2000 - Accounts Payable
02 Aug 2022	Payable Invoice	Huseby Global Litigation	Stenographer	744119	1,256.50	0.00	1,256.50	Litigation Support	2000 - Accounts Payable
05 Sep 2022	Payable Invoice	Veritext, LLC	Stenographer	5932320	395.24	0.00	395.24	Litigation Support	2000 - Accounts Payable
16 Sep 2022	Spend Money	Regus Management Group	Stenographer		176.40	0.00	176.40	Litigation Support	K&C Chase CC
27 Sep 2022	Payable Invoice	Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of David H. Press	Stenographer	A22091709	2,013.30	0.00	2,013.30	Litigation Support	2000 - Accounts Payable
04 Oct 2022	Payable Invoice	Elizabeth Gallo Court Reporting, LLC	Stenographer	114050	2,143.56	0.00	2,143.56	Litigation Support	2000 - Accounts Payable
10 Oct 2022	Payable Invoice	Verbatim Court Reporters, Inc.	Stenographer	22-LMS-195	1,128.00	0.00	1,128.00	Litigation Support	2000 - Accounts Payable
10 Nov 2022	Payable Invoice	Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Shaun Lavelle	Stenographer	A22110652	1,172.60	0.00	1,172.60	Litigation Support	2000 - Accounts Payable
05 Dec 2022	Payable Invoice	Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Leanne Tan	Stenographer	A22100198	1,876.13	0.00	1,876.13	Litigation Support	2000 - Accounts Payable
06 Dec 2022	Payable Invoice	Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Jonathan Trivelas	Stenographer	A22120270	1,416.16	0.00	1,416.16	Litigation Support	2000 - Accounts Payable
14 Dec 2022	Payable Invoice	Huseby Global Litigation - Leanne Tan et al., vs. Quick Box LLC	Stenographer	734734	1,029.12	0.00	1,029.12	Litigation Support	2000 - Accounts Payable
14 Dec 2022	Payable Invoice	Huseby Global Litigation - Leanne Tan et al., vs. Quick Box LLC	Stenographer	735029	1,044.84	0.00	1,044.84	Litigation Support	2000 - Accounts Payable
11 May 2023	Spend Money	Regus	Stenographer	2394-27158	346.50	0.00	346.50	Office Rent	Amex Blue Business Cash
14 Jul 2023	Payable Invoice	Elizabeth Gallo Court Reporting, LLC - LeAnne Tan v. Jeremy Sistrunk	Stenographer	123054	2,300.46	0.00	2,300.46	Litigation Support	2000 - Accounts Payable
18 Jul 2023	Payable Invoice	Huseby Global Litigation - Leanne Tan, et al. v. Quick Box LLC	Stenographer	800907	899.00	0.00	899.00	Litigation Support	2000 - Accounts Payable
18 Jul 2023	Payable Invoice	Huseby Global Litigation - Leanne Tan, et al. v. Quick Box LLC	Stenographer	800576	1,326.95	0.00	1,326.95	Litigation Support	2000 - Accounts Payable
06 Sep 2023	Payable Invoice	LitCourt Corporation - Leanne Tan vs. Konnektive Rewards, LLC, et al.	Stenographer	12596	1,142.50	0.00	1,142.50	Litigation Support	2000 - Accounts Payable
07 Sep 2023	Payable Invoice	LitCourt Corporation - Leanne Tan vs. Konnektive Rewards, LLC, et al.	Stenographer	12594	2,614.00	0.00	2,614.00	Litigation Support	2000 - Accounts Payable
07 Sep 2023	Payable Invoice	LitCourt Corporation - Leanne Tan vs. Quick Box, LLC, et al.	Stenographer	11406	837.50	0.00	837.50	Litigation Support	2000 - Accounts Payable
07 Sep 2023	Payable Invoice	LitCourt Corporation - Leanne Tan vs. Quick Box, LLC, et al.	Stenographer	11381	2,378.45	0.00	2,378.45	Litigation Support	2000 - Accounts Payable
07 Sep 2023	Payable Invoice	LitCourt Corporation - Leanne Tan vs. Quick Box, LLC, et al.	Stenographer	10786	1,510.05	0.00	1,510.05	Litigation Support	2000 - Accounts Payable
07 Sep 2023	Payable Invoice	LitCourt Corporation - Leanne Tan vs. Quick Box, LLC, et al.	Stenographer	11573	505.00	0.00	505.00	Litigation Support	2000 - Accounts Payable
30 Oct 2023	Payable Invoice	The Varallo Group LLC - Deposition of Alan Kulvete	Stenographer	808200	818.13	0.00	818.13	Litigation Support	2000 - Accounts Payable
10 Nov 2023	Payable Invoice	C.J. Reporting - Original Transcript of Alan Kulvete	Stenographer	808494	750.12	0.00	750.12	Litigation Support	2000 - Accounts Payable
30 Nov 2023	Payable Invoice	Huseby Global Litigation - Leanne Tan, et al. v. Quick Box LLC	Stenographer	90030285	1,194.45	0.00	1,194.45	Litigation Support	2000 - Accounts Payable
30 Nov 2023	Payable Invoice	Huseby Global Litigation - Leanne Tan, et al. v. Quick Box LLC	Stenographer	90030289	759.00	0.00	759.00	Litigation Support	2000 - Accounts Payable
08 Dec 2023	Spend Money	Westford Regency - Deposition of Alan Kulvete on 10/25/23	Stenographer		522.41	0.00	522.41	Office Rent	Amex Blue Business Cash
11 Dec 2023	Payable Invoice	Huseby Global Litigation - Leanne Tan, et al. v. Quick Box LLC	Stenographer	90032919	1,459.00	0.00	1,459.00	Litigation Support	2000 - Accounts Payable
20 Feb 2024	Payable Invoice	Huseby Global Litigation - Original transcript of Jacob John Martorano & 30(b)(6) Konnektive LLC	Stenographer	90034680	4,134.03	0.00	4,134.03	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Expedite fee - 30(b)(6) Konnektive LLC	Stenographer	90033980	1,244.80	0.00	1,244.80	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Original Transcript - 30(b)(6) Konnektive LLC	Stenographer	90033971	2,736.00	0.00	2,736.00	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Original Transcript & Expedite Fee - Matthew Martorano	Stenographer	90035892	5,786.77	0.00	5,786.77	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Original Transcript and Expedite Fee - Kathryn Martorano	Stenographer	90032918	4,457.01	0.00	4,457.01	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Video services - 30(b)(6) Konnektive LLC	Stenographer	90033972	1,575.00	0.00	1,575.00	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Video services - Jacob John Martorano	Stenographer	90034684	1,575.00	0.00	1,575.00	Litigation Support	2000 - Accounts Payable
11 Mar 2024	Payable Invoice	Huseby Global Litigation - Video Services - Matthew Martorano	Stenographer	90035899	2,012.50	0.00	2,012.50	Litigation Support	2000 - Accounts Payable
22 Mar 2024	Payable Invoice	Paszkievicz Court Reporting - Deposition of Bernita Jackson	Stenographer	329553	680.00	0.00	680.00	Litigation Support	2000 - Accounts Payable
27 Mar 2024	Payable Invoice	Planet Depos, LLC - ORIGINAL VIDEO TRANSCRIPT: Deposition of Bernita Jackson	Stenographer	331250	775.70	0.00	775.70	Litigation Support	2000 - Accounts Payable
28 Mar 2024	Payable Invoice	Planet Depos, LLC - TRANSCRIPT WITH INDEX OF: Brian Thomas Hill, Corporate Designee	Stenographer	653809	831.79	0.00	831.79	Litigation Support	2000 - Accounts Payable
28 Mar 2024	Payable Invoice	Planet Depos, LLC - TRANSCRIPT WITH INDEX OF: Kerrie Merrifield	Stenographer	655150	809.75	0.00	809.75	Litigation Support	2000 - Accounts Payable
28 Mar 2024	Payable Invoice	Planet Depos, LLC - VIDEOGRAPHY SERVICES FOR THE DEPOSITION OF:	Stenographer	653810	574.00	0.00	574.00	Litigation Support	2000 - Accounts Payable
01 Apr 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Stenographer	2024022371	9.83	0.00	9.83	Software & Internet Support	2000 - Accounts Payable
01 Apr 2024	Payable Invoice	Mazira, LLC - Tan v Quick Box	Stenographer	2024022371	3.06	0.00	3.06	Software & Internet Support	2000 - Accounts Payable
22 Apr 2024	Payable Invoice	WSG Reporting, LLC - Deposition of Brett Walker	Stenographer	9453	1,291.50	0.00	1,291.50	Litigation Support	2000 - Accounts Payable
23 Apr 2024	Payable Invoice	Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Ronald Joseph Mann	Stenographer	A24041344	1,487.75	0.00	1,487.75	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Bruce Stromborn - Transcript	Stenographer	13355	2,313.52	0.00	2,313.52	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Bruce Stromborn - Video	Stenographer	13357	718.75	0.00	718.75	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Keith S. Lerner - Transcript	Stenographer	13352	2,319.40	0.00	2,319.40	Litigation Support	2000 - Accounts Payable

01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Keith S. Lerner - Video	Stenographer	13354	433.75	0.00	433.75	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Kevin Killingsworth - Transcript	Stenographer	13364	2,175.21	0.00	2,175.21	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Kevin Killingsworth - Video	Stenographer	13366	671.25	0.00	671.25	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Stephen Craig Mott - Transcript	Stenographer	13367	1,071.75	0.00	1,071.75	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	LitiCourt Corporation - Leanne Tan, et al. vs. Quick Box, LLC, et al. - Stephen Craig Mott - Video	Stenographer	13369	267.50	0.00	267.50	Litigation Support	2000 - Accounts Payable
01 May 2024	Payable Invoice	Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Jonathan Trivelas	Stenographer	A24050047	342.50	0.00	342.50	Litigation Support	2000 - Accounts Payable
23 May 2024	Payable Invoice	Planet Depos, LLC - Transcript with Index of Joseph Libby	Stenographer	656286	1,252.25	0.00	1,252.25	Litigation Support	2000 - Accounts Payable
23 May 2024	Payable Invoice	Planet Depos, LLC - Videography services for deposition of Joseph Libby	Stenographer	656287	849.00	0.00	849.00	Litigation Support	2000 - Accounts Payable
24 May 2024	Payable Invoice	Planet Depos, LLC - Transcript with Index of Steven Baker, Esquire	Stenographer	657857	894.30	0.00	894.30	Litigation Support	2000 - Accounts Payable
24 May 2024	Payable Invoice	Planet Depos, LLC - Transcript with Index of Tom Chen, Corporate Designee	Stenographer	654098	703.30	0.00	703.30	Litigation Support	2000 - Accounts Payable
24 May 2024	Payable Invoice	Planet Depos, LLC - TRANSCRIPT WITH INDEX OF: Kerrie Merrifield, Volume 2	Stenographer	663866	139.25	0.00	139.25	Litigation Support	2000 - Accounts Payable
24 May 2024	Payable Invoice	Planet Depos, LLC - Videography Services for Deposition of Tom Chen, Corporate Designee	Stenographer	654099	499.00	0.00	499.00	Litigation Support	2000 - Accounts Payable
				Stenographer Total	77,786.59	0.00	77,786.59		
				Grand Total	377,036.82	34,029.20	343,007.62		

EXHIBIT 7



Invoice

Page 1 of 2

Epiq Systems
 Class Action & Claims Solutions
 10300 SW Allen Blvd.
 Beaverton, OR 97005

Remit to
 Epiq
 Class Action & Claims Solutions
 PO Box 674652
 Dallas, TX 75267-4652
 Tax ID: 93-1210932
 Billing questions: call 913-391-5001
 or ecabilling@epiqglobal.com

Electronic Payments:
 Bank: PNC Bank, N.A.
 Wire Routing: 043000096
 ACH Routing: 031207607
 Acct No: 8026542445
 SWIFT: PNCCUS33

Bill-To
 Perkins Coie LLP
 1201 Third Avenue Suite 4900
 Seattle WA 98101-3099

Information
 Invoice No. 90904248 Invoice Date 11/08/2024
 Purchase Order No.
 Customer No. 1004110
 Currency USD
 Contract No. 40070001
 Contract Description Tan v Quick Box
 Terms of Payment Net due in 30 days
 Internal Reference No 40070001

Comments
 Billing Period: 10/01/2024 - 10/31/2024

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
30	Import and Standardize Data	1	EA	1,000.0000	1,000.00
40	Forms Setup & Mailing Coordination	2	EA	750.0000	1,500.00
50	Email Notice Setup	1	EA	500.0000	500.00
60	Email Notice	51,180	EA	0.0300	1,535.40
90	National Change of Address (\$3 per 1000)	285,720	EA	0.0030	857.16
Website and Reporting					
170	Static Website Deployment and Testing	1	EA	2,000.0000	2,000.00
Toll-Free Contact Center					
200	IVR Configuration and Recording	1	EA	2,000.0000	2,000.00
220	IVR Minutes of Use	58.070	EA	0.2500	14.52
230	Notice Request Transcription	3	EA	1.9500	5.85
Postage and Expenses					
390	Postage	113.150	DLR	1.0000	113.15



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Invoice

Page 2 of 2

Epiq Systems
 Class Action & Claims Solutions
 10300 SW Allen Blvd.
 Beaverton, OR 97005

Information			
Invoice No.	90904248	Invoice Date	11/08/2024
Purchase Order No.			
Customer No.	1004110		

Comments
Billing Period: 10/01/2024 - 10/31/2024

Item	Service	Quantity	Unit	Unit Price	Amount
Standard Rates					
590	Project Coordinators	38.100	H	100.0000	3,810.00
610	Data Analyst & Reporting	55	H	150.0000	8,250.00
640	Project Managers	38.700	H	165.0000	6,385.50
660	Software Engineer	34.600	H	195.0000	6,747.00
670	Project Director	3	H	250.0000	750.00
690	Client Services Manager	0.500	H	275.0000	137.50
Hilsoft Billing Rates					
770	Notice Director	0.400	H	275.0000	110.00
820	Notice Coordinator	0.200	H	100.0000	20.00
Net Amount					35,736.08
Sales Tax					182.68
Total Amount Due					35,918.76

Open Items for Contract 40070001 as of 11/07/2024					
Trans. Date	Type	Reference	Due Date	Amount	Curr.
11/08/2024	Invoice	90904248	12/08/2024	35,918.76	USD
Total:				35,918.76	USD



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