

KNEUPPER & COVEY, PC
Kevin Kneupper, Esq. (CA SBN 325413)
kevin@kneuppercovey.com
A. Cyclone Covey, Esq. (CA SBN 335957)
cyclone@kneuppercovey.com
A. Lorraine Weekes, Esq. (CA SBN 332369)
lorraine@kneuppercovey.com
17011 Beach Blvd., Suite 900
Huntington Beach, CA 92647
Tel: (512) 420-8407

*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

**PLAINTIFF’S MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT OF MOTION FOR
ATTORNEY’S FEES, COSTS, AND
INCENTIVE AWARD FOR QUICK
BOX 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 Fees..... 5**

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..... 9**

13 **F. The Skill Required and The Quality of Work 10**

14 **G. Contingent Nature of Fee and Financial Burden to Counsel 12**

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

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

17 **A. The Reasonable Hourly Rate..... 15**

18 **B. The Hours Expended..... 18**

19 **C. The Cross-Check 18**

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

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **I. INTRODUCTION**

2 Plaintiff and the Quick Box Defendants (Quick Box, LLC, Stephen Adelé, James
3 Martell, and Chad Biggins) have agreed to a Class Settlement to resolve the putative Class’s
4 claims against those Defendants in exchange for \$5.5 million. Plaintiff now respectfully
5 requests that the Court award attorney’s fees, costs, and an incentive award to Ms. Tan.

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

7 “In a certified class action, the court may award reasonable attorney's fees and
8 nontaxable costs that are authorized by law or by the parties’ agreement.” Fed. R. Civ. P.
9 23(h). The parties have not negotiated an agreement to attorney’s fees and nontaxable costs,
10 so the Court may award fees and costs that are authorized by law. Class Counsel requests
11 that the Court award one-third of the common fund in attorneys’ fees, or \$1,833,333.33.

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

20 “In a common fund case, the district court has discretion to apply either the lodestar
21 method or the percentage-of-the-fund method in calculating a fee award.” *Fischel v.*
22 *Equitable Life Assurance Soc’y of the United States*, 307 F.3d 997, 1006 (9th Cir. 2002).
23 “One way that a court may demonstrate that its use of a particular method or the amount
24 awarded is reasonable is by conducting a cross-check using the other method.” *Resnick*, 779
25 F.3d at 949. Another court in this Circuit surveyed a number of cases on the question of
26 whether the percentage of common fund or the lodestar approach was preferable, and
27 concluded that there was a “general trend towards the percentage of the fund method to
28 award class attorneys' fees.” *Craft v. Cty. of San Bernardino*, 624 F. Supp. 2d 1113, 1123-

1 25 (C.D. Cal. 2008). The Ninth Circuit agrees: “while the primary basis of the fee award
2 remains the percentage method, the lodestar may provide a useful perspective on the
3 reasonableness of a given percentage award.” *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043,
4 1050 (9th Cir. 2002). *Vizcaino* explained that this was because “it is widely recognized that
5 the lodestar method creates incentives for counsel to expend more hours than may be
6 necessary on litigating a case so as to recover a reasonable fee....” *Id.* at 1050 n.5.

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

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

21 Another significant advantage of using the percentage of the common fund approach
22 is that it minimizes potential difficulties with the lodestar method when applied to the partial
23 settlement situation that exists here. Even when applying the lodestar method to a single-
24 defendant case, that method has flaws. The Third Circuit, for example, noted that the
25 lodestar method “requires an enormous investment of judicial time.” *In re Cendant Corp.*
26 *Litig.*, 264 F.3d 201, 256 (3d Cir. 2001). And “though creating the illusion of mathematical
27 precision, the lodestar method can be quite subjective and can produce wildly varying
28 awards in otherwise similar cases.” *Id.* Counsel has been unable to locate authority on the

1 question of how to allocate hours across multiple defendants in a class action common fund
2 lodestar context. In the context of awarding attorney’s fees and costs as part of a judgment
3 involving fee-shifting statutes, caselaw generally permits attorneys fees to be awarded, for
4 example, for successful claims on unsuccessful claims based on similar facts and legal
5 theories where the claims are intertwined or related in such a way that preparing on one
6 claim assists in prevailing on the other. *See, e.g., Hensley v. Eckerhart*, 461 U.S. 424, 103
7 S. Ct. 1933 (1983); *Quinones v. Chase Bank USA, N.A.*, No. 09cv2748-AJB(BGS), 2012
8 U.S. Dist. LEXIS 54039 at *15-16 (S.D. Cal. Apr. 13, 2012) (collecting cases). While not
9 directly on-point, this suggests that in a RICO class action alleging a conspiracy among
10 various defendants, work as to one Defendant is inextricably intertwined with work as to
11 another. Under the heavily favored percentage of the common fund approach, this issue is
12 largely moot, and the lodestar method should be used as a rough cross-check to satisfy the
13 Court as to the reasonableness of fees.

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

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

23 “[I]n most common fund cases, the award exceeds that benchmark.” *Pasquale v.*
24 *Kaiser Found. Hosps.*, No. 08CV785-MMA (NLS), 2010 U.S. Dist. LEXIS 164275 at *10
25 (S.D. Cal. Mar. 15, 2010). In fact, it is far more common for the award to be one-third than
26 not. *See Romero v. Producers Dairy Foods, Inc.*, No. 1:05cv0484 DLB, 2007 U.S. Dist.
27 LEXIS 86270 at *10 (E.D. Cal. Nov. 13, 2007) (noting that “fee awards in class actions
28 average around one-third of the recovery”); *Sypherd v. Lazy Dog Rests., LLC*, No. 5:20-cv-

1 00921-FLA (KKx), 2023 U.S. Dist. LEXIS 23257 at *12 (C.D. Cal. Feb. 10, 2023) (holding
2 that “awarding over this benchmark is not unusual” and suggesting that in practice “the
3 benchmark is closer to 30%”). “District courts in this circuit have routinely awarded fees of
4 one-third of the common fund or higher after considering the particular facts and
5 circumstances of each case.” *Beaver v. Tarsadia Hotels*, No. 11-cv-01842-GPC-KSC, 2017
6 U.S. Dist. LEXIS 160214 at *31 (S.D. Cal. Sep. 28, 2017).

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

17 This is confirmed by surveys of the case law which have been cited by courts in this
18 District: “Other case law surveys suggest that 50% is the upper limit, with 30-50%
19 commonly being awarded in cases in which the common fund is relatively small.... More
20 particularly, courts may award attorneys fees in the 30-40% range in wage and hour class
21 actions that result in recovery of a common fun under \$10 million.” *Martin v. AmeriPride*
22 *Servs.*, No. 08cv440-MMA (JMA), 2011 U.S. Dist. LEXIS 61796 at *22-23 (S.D. Cal. June
23 9, 2011). The Ninth Circuit has also affirmed awards of one-third of the common fund. *See*
24 *In re Mego Fin. Corp. Sec. Litig.*, 213 F.3d 454, 457-460 (9th Cir. 2000) (affirming an
25 award of one-third of total recovery); *In re Pacific Enters. Sec. Litig.*, 47 F.3d 373, 379 (9th
26 Cir. 1995) (affirming an award of one-third of a \$12 million common fund).

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

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

11 This need to upwardly adjust the attorney’s fees benchmark to encourage contingent-
12 fee counsel to take on socially important lawsuits has been recognized by many courts. *See*
13 *Jeter-Polk v. Casual Male Store, LLC*, No. EDCV 14-891-VAP (DTBx), 2016 U.S. Dist.
14 LEXIS 193466 at *13 (C.D. Cal. Mar. 4, 2016) (“Adjusting court-awarded fees upward in
15 contingent fee cases to reflect the risk of recovering no compensation for hundreds of hours
16 of work makes those fee awards consistent with the legal marketplace, and in so doing,
17 helps to ensure that meritorious cases will be brought to enforce important public interest
18 policies and that clients who have meritorious claims, but lack financial resources, will be
19 better able to obtain qualified counsel.”); *Dasher v. RBC Bank United States (In re Checking*
20 *Account Overdraft Litig.)*, No. 1:09-MD-02036-JLK, 2020 U.S. Dist. LEXIS 142012 at
21 *51-52 (S.D. Fla. Aug. 10, 2020) (“Class Counsel undertook an incredibly risky and
22 undesirable case and, through their diligence, perseverance, and skill, obtained an
23 outstanding result for the settlement class.... The Court firmly believes this kind of initiative
24 and skill must be adequately compensated to ensure that counsel of this caliber is available
25 to undertake these kinds of risky but important cases in the future.”). Protecting the public
26 from fraud—particularly elderly members of the public—is a socially important category
27 of litigation which should be encouraged via attorney’s fees awards. *Maley v. Del Glob.*
28 *Techs. Corp.*, 186 F. Supp. 2d 358, 374 (S.D.N.Y. 2002) (“Private attorneys should be

1 encouraged to take the risks required to represent those who would not otherwise be
2 protected from socially undesirable activities like securities fraud.”).

3 C. The Results Achieved Were Highly Favorable

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

13 In its order granting preliminary approval, the Court recognized that the settlement
14 “provides a substantial monetary benefit to the Class....” *Leanne Tan v. Quick Box, LLC*,
15 No. 20cv1082-LL-DDL, 2024 U.S. Dist. LEXIS 161932 at *10 (S.D. Cal. Sep. 9, 2024).
16 Plaintiff’s estimate of the actual damages for a nationwide class is slightly over \$6.4 million.
17 Decl. of C. Covey at ¶ 29. Trebling of this number would lead to maximum damages of just
18 over \$19.2 million. This is consistent with the estimates of maximum liability provided in
19 bankruptcy by the La Pura Defendants. Decl. of K. Kneupper at ¶ 31. While there have been
20 slight differences during negotiations in estimations of the potential damages by the Quick
21 Box Defendants and Plaintiff, the variance was extremely small.¹

22 Based on the numbers estimated by Plaintiff, the settlement of \$5.5 million amounts to
23 85.9% of the actual damages, and 28.6% of those damages if trebled.

24 Other courts in this Circuit have recognized results similar to this one as an “excellent
25 recovery,” and this settlement is at the high end of recoveries in a class action. *See Nguyen*

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 *v. Radiant Pharm. Corp.*, No. SACV 11-00406 DOC(MLGx), 2014 U.S. Dist. LEXIS
2 63312 at *7-8 (C.D. Cal. May 6, 2014) (describing a settlement of “roughly 25.8 percent of
3 the maximum provable damages” as “an excellent recovery”); *Dunleavy v. Nadler (In re*
4 *Mego Fin. Corp. Sec. Litig.)*, 213 F.3d 454, 459 (9th Cir. 2000) (describing a recovery of
5 roughly 16.67% of the maximum damages as “fair and adequate”); *Bellinghausen v. Tractor*
6 *Supply Co.*, 306 F.R.D. 245, 256 (N.D. Cal. 2015) (describing a settlement that “represents
7 between 27 percent and 11 percent of the total potential recovery” as “fair”); *Stovall-*
8 *Gusman v. W.W. Granger, Inc.*, No. 13-cv-02540-HSG, 2015 U.S. Dist. LEXIS 78671 at
9 *12-13 (N.D. Cal. June 17, 2015) (describing a settlement of 7.3 percent as “on the low end
10 of the spectrum for class settlement awards receiving approval” but still “within the range
11 of reasonableness”).

12 Also significant in evaluating the results is that unlike these other cases, this is a partial
13 settlement, and there will be additional recovery of either \$2 million or \$5 million from the
14 Konnektive Parties. Even at the low end, when the settlements are combined, Class Counsel
15 will have recovered in total either 117% of the actual damages at the low end, or 164% of
16 the actual damages at the high end.

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

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

24 At that time, Class Counsel was only aware of the Quick Box Parties as potential
25 Defendants, and had not yet discovered the identities of the La Pura Parties or the existence
26 of / involvement of the Konnektive Parties. *Id.* at ¶ 32. Class Counsel had no way to
27 determine what the potential damages were or the volume of products sold. *Id.* The lawsuit
28 was filed as part of a broader investigation of the “affiliate marketing” industry—with

1 significant time spent by Class Counsel on several less-successful lawsuits which identified
2 smaller players. *Id.*; *see, e.g., Adam v. Barone, et al*, No. 3:20-cv-10321 (D.N.J. 2020);
3 *Cummings v. Wyer, et al*, No. 2:19-cv-8766 (C.D. Cal. 2019).

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

11 The skepticism was largely the conventional wisdom. In another case awarding fees in
12 a RICO case in another Circuit, the court noted: “It would be difficult to overstate the risk
13 that this case presented at the outset. As a threshold matter, successful RICO actions are
14 exceedingly rare.” *Hale v. State Farm Mut. Auto. Ins. Co.*, No. 12-0660-DRH, 2018 U.S.
15 Dist. LEXIS 210368 at *30 (S.D. Ill. Dec. 13, 2018). “Successful RICO class actions are
16 rarer still.” *Id.*

17 The *Hale* court was not exaggerating—it cited to the following detailed explanation by
18 another court:

19 RICO's enchantment, like the siren's song, has again drawn another crew of
20 spellbound plaintiffs foundering against the rocks. This outcome should come
21 as no surprise to any counsel versed in the formidable intricacies and pitfalls
22 inherent in RICO litigation. These challenges bear out in the minimal rate of
23 success plaintiffs have achieved in prosecuting RICO actions. A survey of 145
24 appellate decisions nationwide rendered from 1999 to 2001 in connection with
25 RICO civil actions provides hard evidence of those failed expectations. It
26 revealed that about 70 percent of the cases were finally disposed of on
defendants' motions to dismiss or for summary judgment, and that in about 80
percent of those in which the appellate Court resolved a RICO issue the ruling
was favorable to defendants. *See Pamela H. Bucy, Private Justice*, 76 S. Cal.

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 L. Rev. 1, 22 (2002). Of the 9.6 percent of the suits in which plaintiffs obtained
2 a favorable verdict after a jury trial, only 25 percent of the judgments were
3 affirmed on appeal. *See id.* In consequence, plaintiffs achieved a final victory
4 in only three of 145 cases -- a or final success rate of a mere two percent.

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

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

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

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

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

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

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

1 The pursuit of this litigation by Class Counsel has resulted in such benefits. First, the
2 La Pura product at issue is no longer being sold and its website has been removed from the
3 Internet. Decl. of K. Kneupper at ¶ 33. The numerous shell companies involved in the
4 alleged fraud appear to no longer be operative, and Rocket Management Group, the
5 company behind the product and various other similar schemes, has forfeited its right to do
6 business based on California Secretary of State filings. Ex. 1. And Kiet Lieu, a principal of
7 RMG who pled the Fifth Amendment in this case, has since been sued by various credit
8 card companies, including one suit for nearly \$150,000. Ex. 2. The size of that collections
9 lawsuit suggests that Mr. Lieu ran out of money at some point during the litigation, meaning
10 he could not still be operating the scheme. Shutting down the sales of this product and others
11 by RMG provided a substantial benefit to consumers nationwide, even apart from the
12 common fund that was recovered.

13 Second, the legal rulings in this case have clarified the law by establishing that third-
14 party vendors who knowingly assist in a “free trial scam” can potentially be held liable for
15 the damage caused by the scheme. *Tan v. Quick Box, LLC*, No. 3:20-cv-01082-H-DEB,
16 2021 U.S. Dist. LEXIS 67791 (S.D. Cal. Apr. 7, 2021).

17 And third, there is inherently a deterrent effect in Class Counsel’s pursuit of this
18 litigation (which was a part of multiple other class action lawsuits directed at the “affiliate
19 marketing” industry as a whole). Members of that industry are now well aware that there
20 can be monetary consequences for participating in or assisting such activities, and by
21 pursuing this lawsuit, a signal has been sent that knowing involvement in similar schemes
22 is not tolerated by the law.

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

24 Another factor for consideration is “the skill required and the quality of work.”
25 *Shannon v. Sherwood Mgmt. Co.*, No. 19-cv-1101-BAS-JLB, 2020 U.S. Dist. LEXIS
26 184286 at *5 (S.D. Cal. Oct. 5, 2020).

27 As to the skill required, other courts have described RICO as one of the most complex
28 statutes ever enacted by Congress. *In re Ins. Brokerage Antitrust Litig.*, Nos. 04-5184

1 (GEB), 05-1079 (GEB), 2007 U.S. Dist. LEXIS 25632 at *47 (D.N.J. Apr. 5, 2007). As
2 another court put it when considering this factor as to a RICO class action:

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

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

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

21 While this case did not involve loan transactions as in *Faircloth*, it involved
22 something arguably more complex: understanding the functionality of complex computer
23 software, as well as understanding of the intricacies of the payment processing system and
24 its rules, and unearthing the tactics used as part of the scheme to circumvent them. *Physics*
25 *v. Yeak*, No. CV-20-00379-TUC-JCH, 2024 U.S. Dist. LEXIS 121765 at *7 (D. Ariz. July
26 11, 2024) (“Legal expertise aside, the subject matter here involved several complex and
27 technical scientific issues.”). Not only did Class Counsel have to understand software, but
28 to successfully pursue the case, they had to **develop** software that was customized to
download and preserve the evidence at issue. Decl. of C. Covey at ¶ 30. Class Counsel
further had to grapple with complex bankruptcy law issues before a bankruptcy judge after
Defendant Total Health Supply TUA, Inc. declared bankruptcy and invoked the automatic
bankruptcy stay to stop discovery. Decl. of K. Kneupper at ¶ 31. The case also required the

1 skill to deal with numerous novel legal issues raised over the years that it was ongoing. *See,*
2 *e.g., Spencer-Ruper v. Scientiae*, No. 8:19-cv-01709-DOC - ADS, 2021 U.S. Dist. LEXIS
3 204246 at *6-7 (C.D. Cal. Sep. 24, 2021) (listing the various complex activities counsel
4 there had to engage in, which occurred here as well).

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

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

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

24 Another factor (or factors) courts consider is the contingent nature of the fee and the
25 financial burden to counsel of undertaking the case. Many courts roll this into a single factor
26 because the two are related / overlapping. *See Testone v. Barlean's Organic Oils, LLC*, No.
27 3:19-cv-00169-RBM-BGS, 2023 U.S. Dist. LEXIS 37308 at *13-14 (S.D. Cal. Mar. 6,
28

1 2023) (listing as the fourth factor for consideration “the contingent nature of the fee and the
2 financial burden carried by the plaintiffs”).

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

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

23 Another case, *Beaver v. Tarsadia Hotels*, No. 11-cv-01842-GPC-KSC, 2017 U.S.
24 Dist. LEXIS 160214 (S.D. Cal. Sep. 28, 2017), also awarded a one-third fee as a percentage
25 of the common fund, in part because of the risks counsel had assumed by taking the case on
26 a contingent fee. That court noted that: “Courts have long recognized that the attorneys'
27 contingent risk is an important factor in determining the fee award and may justify awarding
28 a premium over an attorneys' normal hourly rates.” *Id.* at *40-41 (quoting *Monterrubio v.*

1 *Best Buy Stores, L.P.*, 291 F.R.D. 443, 457 (E.D. Cal. 2013)). The court held: “Counsel
2 assumed all the financial risk of the case, since the fee arrangement required Class Counsel
3 to bear all of the costs of litigation. Even with the Court's finding in favor of Plaintiffs on
4 liability, there was still a risk that the Court would agree with defendants' restitution
5 methodology and award zero in restitution - thus leaving Class Counsel with no
6 remuneration for six years and 9,104 hours of work and the nearly \$200,000 they spent over
7 the course of this case. That substantial risk warrants an appropriate fee.” *Beaver*, 2017 U.S.
8 Dist. LEXIS 160214 at *41.

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

15 **H. Awards in Similar Cases**

16 A factor that is sometimes included in lists for consideration is awards in similar
17 cases. *See Clarke*, 2015 U.S. Dist. LEXIS 194842 at *20 (awarding one-third of common
18 fund). As discussed above, one-third of the common fund is a typical award in cases with
19 common funds in the range of \$10 million. In *In re Merck & Co. Vytarin ERISA Litig.*, Civil
20 Action No. 08-CV-285 (DMC), 2010 U.S. Dist. LEXIS 12344 at *9-11 (D.N.J. Feb. 9,
21 2010), the court awarded one-third of a common fund in a class action lawsuit involving
22 both RICO claims and claims under the New Jersey Consumer Fraud Act. However, as the
23 court there noted, the Third Circuit uses a different benchmark than the Ninth Circuit (using
24 a benchmark of one-third for settlements under \$100,000,000). Another court, *CGC*
25 *Holding Co., Ltd. Liab. Co. v. Hutchens*, Civil Action No. 11-cv-01012-RBJ-KLM, 2017
26 U.S. Dist. LEXIS 220354 (D. Colo. Dec. 18, 2017), also considered a common fund award
27 in a RICO case, and also awarded one-third of the common fund as attorney's fees. That
28 case also has distinctions: the decision was being made after a judgment (along with partial

1 settlements), and the analysis was performed under a different standard applied in the Tenth
2 Circuit. The Tenth Circuit later partially reversed class certification as to some defendants,
3 but did not address the award of attorney’s fees. *CGC Holding Co., Ltd. Liab. Co. v. Broad*
4 *& Cassel*, 773 F.3d 1076 (10th Cir. 2014). But in persuasive terms, the court there
5 considered several factors important in awarding the fee. First, “RICO cases are difficult.
6 At the beginning of the case defendants raised interesting and novel issues concerning the
7 reach of RICO....” *CGC Holding Co.*, 2017 U.S. Dist. LEXIS 220354 at *7. Second, “it is
8 difficult to understate the degree of opposition that plaintiffs’ counsel faced and ultimately
9 overcame in this case. The Hutchens defendants were represented by at least five different
10 law firms along the way. The case set new records for me in terms of motions, hearings,
11 orders, appeals, and scorched earth litigation.... One need only look at the docket entries,
12 numbering 889 entries as of December 15, 2017, to know why so many hours have been
13 required to prosecute (and defend) this case.” *Id.* at *9.

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

15 “In order to determine the lodestar figure, the Court calculates the number of hours
16 reasonably expended on the litigation and then multiplies that number by a reasonable
17 hourly rate.” *Heid* 2024 U.S. Dist. LEXIS 156801 at *31. “Moreover, ‘[t]he lodestar ‘cross-
18 check’ need not be as exhaustive as a pure lodestar calculation’ because it only ‘serves as a
19 point of comparison by which to assess the reasonableness of a percentage award.’” *Id.* at
20 *33-34 (quoting *Fernandez v. Victoria Secret Stores, LLC*, No. CV 06-04149 MMM (SHx),
21 2008 U.S. Dist. LEXIS 123546, 2008 WL 8150856, at *14 (C.D. Cal. July 21, 2008)).
22 “Accordingly, ‘the lodestar can be approximate and still serve its purpose.’” *Id.*

23 **A. The Reasonable Hourly Rate**

24 “The Court first considers whether Class Counsel’s hourly rates are reasonable.” *Heid*,
25 2024 U.S. Dist. LEXIS 156801 at *31. “To assist the court in calculating the lodestar, a
26 plaintiff must submit ‘satisfactory evidence...that the requested rates are in line with those
27 prevailing in the community for similar services by lawyers of reasonably comparable skill,
28 experience, and reputation.’” *Brown v. 22nd Dist. Agric. Ass’n*, No. 15-cv-2578-DHB, 2017

1 U.S. Dist. LEXIS 75439 at *37-38 (S.D. Cal. May 15, 2017) (quoting *Blum v. Stenson*, 465
2 U.S. 886, 895-96 n.11 104 S. Ct. 1541 (1984)). “The relevant community is that in which
3 the district court sits.” *Brown*, 2017 U.S. Dist. LEXIS 75439 at *37. “Declarations regarding
4 the prevailing market rate in the relevant community suffice to establish a reasonable hourly
5 rate.” *Id.* Counsel propose the following rates as reasonable for the lodestar cross-check:

| | |
|-------------------|-----|
| 6 Kevin Kneupper | 815 |
| 7 Cyclone Covey | 815 |
| 8 Lorraine Weekes | 445 |
| 9 Andrea Reed | 445 |
| 10 Jarrett Faber | 365 |
| 11 Bara Ahmad | 295 |
| 12 Suzy Garcia | 135 |
| 13 Elyssa Gerber | 80 |

14
15 The relevant community here for the lodestar cross-check would be the Southern
16 District of California. Other decisions from this District have approved of similar rates in
17 class action lawsuits. In *Hartless v. Clorox Co.*, 273 F.R.D. 630, 644 (S.D. Cal. 2011), the
18 court cited multiple cases holding that partner rates in class action cases ranged from \$475
19 to \$750 per hour and associate rates ranged from \$275 to \$425 per hour. The court then
20 approved a rate of \$675 an hour for experienced attorneys and held that as of 2011, “based
21 on the Court's familiarity with the rates charged by other firms in the San Diego area, the
22 Court finds the rates charged by the attorneys and paralegals in this action reasonable.” *Id.*

23 In 2019—again, prior to the significant inflation in recent years—another court in this
24 District again collected cases on this issue. *Ronquillo-Griffin v. TransUnion Rental*
25 *Screening Sols., Inc.*, No. 17cv129 JM (BLM), 2019 U.S. Dist. LEXIS 79021 at *28 (S.D.
26 Cal. May 9, 2019). The court cited cases approving up to \$795 per hour for partners in class
27 actions. *Id.* It reviewed a table of hourly rates up to \$705 an hour for partners, and held that
28 “Counsel's hourly rates are reasonable.” *Id.* at *27-28. More recently, a few weeks ago a

1 court in this District approved of class action rates ranging from \$525 to \$825 an hour.
2 *Fitzgerald*, 2024 U.S. Dist. LEXIS 195579 at *30-31. The court held that those rates “are
3 within the range normally charged within this legal community.” *Id.*

4 Another datapoint that is relevant to the market rate is what Class Counsel have
5 actually charged on an hourly basis in real-world markets. *Velez v. Roche*, No. C-02-0337
6 EMC, 2004 U.S. Dist. LEXIS 29848 at *23 (N.D. Cal. Sep. 22, 2004). Lead Class Counsel,
7 Kevin Kneupper and Cyclone Covey, primarily work on a contingent fee basis, but were
8 retained in 2024 to work on technology-related litigation on an hourly basis at a rate of
9 \$1,000 per hour for both attorneys. Decl. of K. Kneupper at ¶ 36. Mr. Kneupper was also
10 billed out at a rate of \$725 an hour to paying clients in the 2016 timeframe while working
11 at another law firm, McKool Smith, and while located in Austin, Texas. *Id.* These real-
12 world datapoints as to the prevailing market rate for Class Counsel’s services, given their
13 experience, supports the rates proposed for the lodestar cross-check.

14 Another data point as to reasonableness is the Laffey Matrix, a regularly-updated table
15 of suggested rates based on years of experience for attorneys in the Washington, D.C. area.³
16 Both Mr. Kneupper and Mr. Covey would fall in the range of attorneys with 11-19 years of
17 experience, with a suggested rate of \$948 per hour by the Laffey Matrix. While this does
18 not reflect rates in this community, some courts in this District have considered it
19 persuasive. *See Long v. Stanley Black & Decker, Inc.*, No. 14-CV-1246 JLS (BGS), 2015
20 U.S. Dist. LEXIS 53595 at *14 (S.D. Cal. Apr. 23, 2015); *Brown v. 22nd Dist. Agric. Ass’n*,
21 No. 15-cv-02578-DHB, 2017 U.S. Dist. LEXIS 115321 at *15-16 (S.D. Cal. July 21, 2017).
22 Given the geographic difference, the Laffey Matrix cannot be considered dispositive, but it
23 is another datapoint suggesting that the rates for Class Counsel are reasonable.

24 Counsel for Plaintiff in this case are highly experienced in complex litigation. *See* Decl.
25 of K. Kneupper at ¶ ¶ 1-30; Decl. of C. Covey at ¶ 1-24. Counsel are further highly
26 experienced in consumer law cases, and the law firm of Kneupper & Covey currently
27

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

1 maintains a docket of over 350 active individual consumer law cases in either arbitration or
2 litigation. Decl. of K. Kneupper at ¶ 29. The law firm has settled or recovered judgments in
3 over 200 individual consumer law cases in 2023, and counsel are regularly involved in
4 numerous mediations or settlement discussions. *Id.* at ¶ 30. In 2023, these individually
5 settled or recovered cases by Kneupper & Covey amounted to more than \$2.5 million. *Id.*

6 **B. The Hours Expended**

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

21 Counsel has submitted detailed billing records showing that the amount of time
22 expended amounts to \$1,828,069.50 at the hourly rates above. *See* Ex. 3, 4; *see also* *Ziegler*
23 *v. GW Pharms., PLC*, No. 21-cv-1019-BAS-MSB, 2024 U.S. Dist. LEXIS 52979 at *24
24 (S.D. Cal. Mar. 25, 2024) (submission of detailed billing records satisfies lodestar burden).

25 **C. The Cross-Check**

26 The cross-check is performed by comparing the ultimate number billed—currently
27 \$1,828,069.50, assuming no further reduction by the Court—to the percentage of the fund
28 request, \$1,833,333.33. As discussed above, this calculation does not contain any reduction

1 in the hours expended to reflect work performed only as to the Quick Box Parties. But in a
2 lodestar cross-check, there is “no precise rule or formula” for determining what hours to
3 include or exclude, and “the court ‘necessarily has discretion in making this equitable
4 judgment.’” *Ziegler*, 2024 U.S. Dist. LEXIS 52979 at *24.

5 As a starting point to whether to make such a reduction (i.e., analyzing work solely as
6 to the Quick Box Parties), Class Counsel believes it would largely be immaterial to the
7 analysis. This is because multipliers of between one and four are “commonly found to be
8 appropriate” in a complex class action. *Id.* at *21. In other words, unless the Court finds
9 that less than \$458,333.33 in attorneys fees were reasonably expended, the multiplier would
10 be less than four, and the lodestar cross-check would indicate that the requested fee under
11 the percentage approach is fair. Another way to look at the issue would be to combine (in
12 the cross-check) the maximum possible fee requests for both the Quick Box and Konnektive
13 settlements. Even assuming Plaintiff wins the proposed bench trial and recovers \$10.5
14 million—the maximum theoretical recovery—that would amount to \$3.5 million in fees if
15 the Court awarded one-third. And even without including any further time that will
16 necessarily be spent on the proposed bench trial, the multiplier could be at maximum 1.9
17 across both settlements, and that multiplier will only decrease with more time spent.

18 Class Counsel would further submit that any time spent as to the La Pura Parties was
19 necessary as to the Quick Box Parties, because the claims against the Quick Box Parties
20 either involve vicarious liability or a RICO conspiracy which would require proof of the
21 underlying allegations against the La Pura Parties. While some portion of the time included
22 in this calculation was spent on claims against the Konnektive Parties, again, the RICO
23 claim here alleged that each were part of an enterprise with one another, and thus the factual
24 and legal issues are inextricably intertwined. But the Court need not delve into the details
25 of that issue here both because a “combined settlement cross-check” produces a theoretical
26 maximum multiplier of 1.9 for the case as a whole, and because to reach a multiplier
27 specifically as to the Quick Box Parties of more than 4, it would require more than 75% of
28 the time to be excluded. Because there is no way to conduct the cross-check and reach a

1 multiplier of more than four, and because the Court is allowed significant leeway, Class
2 Counsel submits that it supports the requested fee award.

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

4 Class Counsel seeks costs of \$83,700.17, which are costs up to the date of the Quick
5 Box settlement, as well as \$35,918.76 incurred to date for class notice expenses, as well as
6 any final invoices for class notice, for a current total of \$119,618.93. Ex. 5 at 4. “Reasonable
7 costs and expenses incurred by an attorney who creates or preserves a common fund are
8 reimbursed proportionately by those class members who benefit by the settlement.” *In re*
9 *Packaged Seafood Prods. Antitrust Litig.*, No. 15-MD-2670 DMS (MDD), 2022 U.S. Dist.
10 LEXIS 150247 at *27-28 (S.D. Cal. Aug. 19, 2022) (quoting *In re Media Vision Tech. Sec.*
11 *Litig.*, 913 F. Supp. 1362, 1366 (N.D. Cal. 1995)). “Such expense awards comport with the
12 notion that the district court may ‘spread the costs of the litigation among the recipients of
13 the common benefit.’” *Id.* (quoting *Wininger v. SI Mgmt. L.P.*, 301 F.3d 1115, 1121 (9th
14 Cir. 2002)). “The prevailing view is that expenses are awarded in addition to the fee
15 percentage.” *In re Capacitors Antitrust Litig.*, No. 3:17-md-02801-JD, 2018 U.S. Dist.
16 LEXIS 169764 at *42 (N.D. Cal. Sep. 21, 2018) (quoting *Williams v. SuperShuttle Int’l,*
17 *Inc.*, No. 12-CV-06493-WHO, 2015 U.S. Dist. LEXIS 19341, 2015 U.S. Dist. LEXIS
18 19341, at *6 (N.D. Cal. Feb. 12, 2015)).

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

1 The total costs to date in Exhibit 6 are roughly \$400,000, but Counsel is not seeking
2 those costs that occurred after the date of settlement with one exception: the final amount
3 of fees associated with class notice, which are not yet finalized.

4 Courts have routinely awarded amounts in the same range or exceeding what Class
5 Counsel is requesting here in complex class action lawsuits. *See In re Apple Inc. Device*
6 *Performance Litig.*, No. 5:18-md-02827-EJD, 2021 U.S. Dist. LEXIS 50546 at *46-47
7 (N.D. Cal. Mar. 17, 2021) (awarding \$995,244.93 in costs); *In re Capacitors Antitrust Litig.*,
8 2018 U.S. Dist. LEXIS 169764 at *53-54 (awarding \$6,690,000 in costs out of a
9 \$66,900,000 common fund, amounting to 10% of the recovered common fund); *In re*
10 *Immune Response*, 497 F. Supp. 2d at 1177 (awarding \$261,971.79 in costs); *In re Packaged*
11 *Seafood Prods.*, 2022 U.S. Dist. LEXIS 150247 at *28 (awarding \$2,507,500.25 in costs).

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

20 Class Counsel further expects that there will be additional costs with respect to Class
21 Notice. Class Counsel has attached an invoice for \$35,918.76 for costs related to notice,
22 which is due upon completion. Ex. 7. To the extent there are any further related expenses
23 for Class Notice, Class Counsel expects them to be available and calculable at or before the
24 final approval hearing. In total and at present, the requested expenses are \$119,618.93. As
25 explained above, these expenses are in line with other class actions and are of the kind
26 normally billed to clients.

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 Quick Box Parties of \$3,000 (and will request another award
4 of an additional \$3,000 from the proposed settlement with the Konnektive Parties). The total
5 requested as an incentive 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.”

11 Since the *Radcliffe* decision, various courts have held that incentive awards of up to
12 \$7,500 are presumptively reasonable. *See Vallejo v. Sterigenics U.S., Ltd. Liab. Co.*, No.
13 20-cv-01788-AJB-AHG, 2023 U.S. Dist. LEXIS 216241 (S.D. Cal. Dec. 5, 2023)
14 (approving a service award of \$7,500 from a common fund of \$1,020,430.15 and holding
15 that “[t]he incentive award for the Class Plaintiff in this case is 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 as an
28 incentive award. *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 where there was a **negotiated** incentive award included
16 as part of the settlement. In such a situation, as *Radcliff* stated, “if the class representatives
17 had concerns about the settlement's fairness, they could either remain silent and accept the
18 \$5,000 awards or object to the settlement and risk getting as little as \$26 if the district court
19 approved the settlement over their objections.” *Radcliffe*, 715 F.3d at 1165. But in *Aguilar*—
20 as in this case—that situation did not exist: “This settlement agreement, however, does not
21 condition receipt of any incentive awards on support of the settlement, and merely indicates
22 plaintiffs will apply to the court for such payments.” *Aguilar*, 2017 U.S. Dist. LEXIS 4320
23 at *24-26.

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

1 to anything’ and that he would ‘jeopardize the \$5,000 [he] would receive [under the
2 settlement]’ if he did not support the settlement. Class counsel also told the district court
3 that they had told other plaintiffs that they ‘don’t see a way for people who don’t support the
4 settlement to receive an incentive award.’” *Id.* at 1164-65. And even where *Radcliffe*
5 criticizes the disparate size of the incentive awards, it repeatedly attributes the problem to
6 “the incentive-awards agreements,” and even makes clear in that section that: “Here, our
7 analysis focuses on the agreement.” *Id.* at 1166. “That Objecting Plaintiffs could have
8 petitioned for incentive awards is irrelevant to the conflict **created by the settlement**
9 **agreement.**” *Id.* (emphasis added).

10 Like in *Aguilar*, the proposed settlement here did not make any agreement as to the
11 incentive award, its size, or condition it on approval, but instead left the issue to the Court.
12 Unlike in *Radcliffe*, Class Counsel have not told Ms. Tan that she would not be entitled to
13 anything if she objected to the settlement, have not told her that she would jeopardize the
14 settlement by not supporting it, and have not told her that she must support this settlement
15 to receive an incentive award. Decl. of K. Kneupper at ¶ 37.

16 This means the concern expressed in *Radcliff*—that Ms. Tan might feel pressured to
17 accept the settlement or lose out on an agreed incentive award that was higher than what
18 she would receive as a class member—does not exist. Instead, she agreed to a settlement
19 with no requirement that she receive an incentive award at all unless the Court decided to
20 award one. The settlement here is likewise silent as to the amount of Class Counsel’s
21 attorney’s fees and expressly leaves both issues to the Court. The settlement here was
22 intentionally drafted this way to avoid the kinds of conflicts and risks of collusion that
23 frequently exist in the class action context. By contrast, in *Radcliff*, the 9th Circuit believed
24 the settlement was designed not to avoid collusion or conflicts, but to use threats relating to
25 the incentive award to pressure class representatives into accepting the terms.

26 With respect to evaluating the incentive award, the 9th Circuit examines “the number
27 of named plaintiffs receiving incentive payments, the proportion of the payments relative to
28 the settlement amount, and the size of each payment.” *In re Illumina, Inc. Sec. Litig.*, 2019

1 U.S. Dist. LEXIS 217596 at *19 (citing *Staton v. Boeing Co.*, 327 F.3d 938, 977 (9th Cir.
2 2003)).

3 Ms. Tan here is the only Plaintiff who would be receiving an award. A \$3,000
4 incentive award under the settlement with the Quick Box Parties would be less than .001%
5 of the \$5.5 million common fund—even smaller than the “less than a quarter of one percent”
6 that caused the *Spann* court to consider any disparity a non-issue. *Spann*, 314 F.R.D. at 329.
7 And the size of the payments to the class members again are an important distinction
8 because here, class members were signed up for recurring subscriptions. Each month—until
9 they discovered the undisclosed subscription—class members were billed for roughly \$200.
10 Some class members were billed for six months or more (meaning they would have been
11 billed \$1,200 or more in unauthorized shipments). Decl. of K. Kneupper at ¶ 38. Unless all
12 class members submit claims, these damages may be trebled, meaning some class members
13 may be entitled to \$3,600 or more—eliminating any disparity with the incentive award.

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

23 **VI. CONCLUSION**

24 Plaintiff respectfully requests that the Court award \$1,833,333.33 in attorney’s fees
25 and \$119,618.93 in costs and expenses to Kneupper & Covey, PC, to be updated with final
26 information about class notice costs by the hearing date, and a \$3,000 incentive award to
27 Ms. Tan.
28

1 DATED: November 22, 2024

KNEUPPER & COVEY, PC

2 /s/Kevin M. Kneupper

3 Kevin M. Kneupper, Esq.

4 *Attorneys for Plaintiff LeAnne Tan*
5 *and the putative Class*

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KNEUPPER & COVEY, PC
Kevin Kneupper, Esq. (CA SBN 325413)
kevin@kneuppercovey.com
A. Cyclone Covey, Esq. (CA SBN 335957)
cyclone@kneuppercovey.com
A. Lorraine Weekes, Esq. (CA SBN 332369)
lorraine@kneuppercovey.com
17011 Beach Blvd., Suite 900
Huntington Beach, CA 92647
Tel: (512) 420-8407

*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,

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: 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

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/JUUZNBEL5HDNHQ3QAPTYU4FE4/](https://www.wsocvtv.com/news/local/rat-race-driver-blames-vroom-license-plate-issues/JUUZNBEL5HDNHQ3QAPTYU4FE4/). 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/4RGRQCHOMRFP5PXBZTKVUHPQ54/)
9 [credit/4RGRQCHOMRFP5PXBZTKVUHPQ54/](https://www.wsbtv.com/news/local/fulton-county/brother-sister-win-lawsuit-against-metro-atlanta-landlord-accused-damaging-their-credit/4RGRQCHOMRFP5PXBZTKVUHPQ54/).

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 Verastar 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.
28

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 22nd day of November, 2024 in Duluth, Georgia.

4
5 /s/ A. Cyclone Covey

6 A. Cyclone Covey, Esq.
7 Declarant
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KNEUPPER & COVEY, PC
Kevin Kneupper, Esq. (CA SBN 325413)
kevin@kneuppercovey.com
A. Cyclone Covey, Esq. (CA SBN 335957)
cyclone@kneuppercovey.com
17011 Beach Blvd., Suite 900
Huntington Beach, CA 92647
Tel: (512) 420-8407

*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: 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

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/JGNLZ7X26FBIJG32MPALCO2HUE/)
3 [them/JGNLZ7X26FBIJG32MPALCO2HUE/](https://www.wsbtv.com/news/local/vroom-customers-say-months-after-buying-cars-they-still-cant-legally-drive-them/JGNLZ7X26FBIJG32MPALCO2HUE/), 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/JUUZNBEL5HDNHQ3QAPTYU4FE4/)
6 [issues/JUUZNBEL5HDNHQ3QAPTYU4FE4/](https://www.wsoctv.com/news/local/rat-race-driver-blames-vroom-license-plate-issues/JUUZNBEL5HDNHQ3QAPTYU4FE4/); 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 \$400,000. This amount was advanced out of our personal funds
11 or the proceeds of other litigation. While Kneupper & Covey currently consists of seven
12 attorneys, at the time of filing, it only consisted of myself and Mr. Covey. We could have
13 filed and prosecuted other cases during this period instead of this one, as the firm generally
14 receives requests for representation from more than one hundred potential clients every
15 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 as of the date of the Quick Box settlement. Those expenses total
14 \$83,700.17, and that amount is highlighted in green on page 3 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 22nd day of November, 2024 in Huntington Beach, California.

22
23 

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

EXHIBIT 1

California
Secretary of State

Home

Search

Forms

Help

Business UCC Login

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.

rocket management group

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

| | |
|--|--------------|
| SHORT TITLE: CAPITAL ONE, N.A. vs. KIET T LIEU, | CASE NUMBER: |
|--|--------------|

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: |
|--|--------------|

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 - 10/19/2023

Total: 2438:00 Billable: 2424:12 Amount: 1,593,431.00 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. Howatt 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. Howatt 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 Plaintiff's 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 Konektive 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 konektive 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 konektive "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 Plaintiffs 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 itnesses 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 regardingsame. 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 Optimzyer (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 | Suzu 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 | Suzu 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 | Suzu 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 | Suzu 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 | Suzu 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 | Suzu 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. Sistrunk. 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. Sistrunk; 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 Sistrunk 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, Plaintiffs 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 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] | 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 Reviea. 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 Reviea; 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 WeTransfer 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 Subpoena 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 Plaintiffs 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 Kulvete; 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 |

EXHIBIT 4

| username | fname | lname | local_date | local_day | hour | jobcode | notes |
|--------------------------|---------|----------|------------|-----------|------|---------|--|
| cyclone@nrappeccovey.com | Cyclone | Covey | 1/13/20 | Mon | 5.8 | La Pura | discuss findings with K Kneupper |
| kevin@nrappeccovey.com | Kevin | Kneupper | 1/13/20 | Mon | 0.3 | La Pura | Conference with C. Covey regarding La Pura. |
| cyclone@nrappeccovey.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@nrappeccovey.com | Kevin | Kneupper | 1/14/20 | Tue | 0.3 | La Pura | Conference with C. Covey regarding client's factual background. |
| kevin@nrappeccovey.com | Kevin | Kneupper | 1/26/20 | Sun | 3.9 | La Pura | Search for information regarding La Pura and related affiliates; review websites and backup materials. |
| cyclone@nrappeccovey.com | Cyclone | Covey | 1/27/20 | Mon | 0.5 | La Pura | Discuss claim with potential client |
| cyclone@nrappeccovey.com | Cyclone | Covey | 1/28/20 | Tue | 0.4 | La Pura | Emails with client about process and shipping, next steps |
| cyclone@nrappeccovey.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@nrappeccovey.com | Cyclone | Covey | 1/30/20 | Thu | 0.1 | La Pura | confirm box to get items from client was shipped |
| kevin@nrappeccovey.com | Kevin | Kneupper | 2/3/20 | Mon | 4.8 | La Pura | Review evidence relating to La Pura; analyze issues relating to potential complaint. |
| kevin@nrappeccovey.com | Kevin | Kneupper | 2/4/20 | Tue | 0.3 | La Pura | E-mail E. Giglia regarding attorney to draft La Pura complaint. |
| cyclone@nrappeccovey.com | Cyclone | Covey | 2/7/20 | Fri | 2 | La Pura | Research Quickbox founders |
| kevin@nrappeccovey.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@nrappeccovey.com | Kevin | Kneupper | 2/8/20 | Sat | 1.7 | La Pura | Research Quickbox connection to free trial scams. |
| cyclone@nrappeccovey.com | Cyclone | Covey | 2/9/20 | Sun | 4.2 | La Pura | research 2chads, founders, other employees |
| cyclone@nrappeccovey.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@nrappeccovey.com | Cyclone | Covey | 2/11/20 | Tue | 4.1 | La Pura | Continue drafting quickbox complaint details; call with K Kneupper RE: same |
| kevin@nrappeccovey.com | Kevin | Kneupper | 2/11/20 | Tue | 0.8 | La Pura | Conference with C. Covey regarding Quickbox involvement in scam. |
| cyclone@nrappeccovey.com | Cyclone | Covey | 2/12/20 | Wed | 5.2 | La Pura | Internet searches to find other scammers lultified by La Pura |
| kevin@nrappeccovey.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@nrappeccovey.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@nrappeccovey.com | Cyclone | Covey | 2/17/20 | Mon | 1.5 | La Pura | Save websites related to quickbox part of complaint |
| cyclone@nrappeccovey.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@nrappeccovey.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@nrappeccovey.com | Kevin | Kneupper | 2/20/20 | Thu | 1.3 | La Pura | Research prior cases involving CodeClouds. |
| kevin@nrappeccovey.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@nrappeccovey.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@nrappeccovey.com | Kevin | Kneupper | 2/27/20 | Thu | 0.1 | La Pura | E-mail M. Smith regarding draft La Pura complaint. |
| cyclone@nrappeccovey.com | Cyclone | Covey | 2/28/20 | Fri | 1 | La Pura | Review Inlight CRM website and archive entire website; initial review of draft complaint from associate; discuss same w K Kneupper |
| kevin@nrappeccovey.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@nrappeccovey.com | Cyclone | Covey | 2/29/20 | Sat | 1.1 | La Pura | Review draft complaint and make notes for discussion next week. |
| kevin@nrappeccovey.com | Kevin | Kneupper | 3/1/20 | Sun | 2.1 | La Pura | Review and comment on draft of La Pura complaint. |
| cyclone@nrappeccovey.com | Cyclone | Covey | 3/2/20 | Mon | 0.2 | La Pura | Archive US version of scam website |
| cyclone@nrappeccovey.com | Cyclone | Covey | 3/2/20 | Mon | 1.3 | La Pura | Review complaint with Meg and K Kneupper and discuss questions and needed edits. |
| kevin@nrappeccovey.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 konektive; review archive of konektive website materials; discuss with C. Covey regarding konektive. |
| cyclone@nrappeccovey.com | Cyclone | Covey | 3/3/20 | Tue | 6.6 | La Pura | Archive konektive 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@nrappeccovey.com | Kevin | Kneupper | 3/3/20 | Tue | 0.4 | La Pura | Conference with C. Covey regarding konektive. |
| cyclone@nrappeccovey.com | Cyclone | Covey | 3/5/20 | Thu | 1 | La Pura | archive websites and pages on konektive flagged by K Kneupper |
| cyclone@nrappeccovey.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@nrappeccovey.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@nrappeccovey.com | Kevin | Kneupper | 3/12/20 | Thu | 1.2 | La Pura | Research and analyze HICO issues relating to draft complaint. |
| cyclone@nrappeccovey.com | Cyclone | Covey | 3/13/20 | Fri | 1.8 | La Pura | review art complaint; conference with Meg Smith and K Kneupper RE: complaint edits; review konektive documents; look up service address for konektive CEO; google search for more posts on konektive and its connection to defendants. |
| cyclone@nrappeccovey.com | Cyclone | Covey | 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@nrappeccovey.com | Cyclone | Covey | 3/19/20 | Fri | 0.8 | 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. |
| kevin@nrappeccovey.com | Kevin | Kneupper | 3/19/20 | Thu | 1.4 | La Pura | Search for information regarding additional potential defendants; e-mail C. Covey and M. Smith regarding same. |
| kevin@nrappeccovey.com | Kevin | Kneupper | 4/14/20 | Tue | 2.5 | La Pura | Review QuickBox website for information relating to activities. |
| kevin@nrappeccovey.com | Kevin | Kneupper | 4/15/20 | Wed | 5.9 | La Pura | Review prior court documents; identify key aspects of prior court case; edit complaint. |
| kevin@nrappeccovey.com | Kevin | Kneupper | 4/16/20 | Thu | 8 | La Pura | Investigate QuickBox Defendants; research S. Adele; search for podcasts and other videos featuring QuickBox employees; edit complaint. |
| cyclone@nrappeccovey.com | Cyclone | Covey | 4/17/20 | Fri | 0.1 | La Pura | Discuss priorities and defendants to include with K Kneupper |
| kevin@nrappeccovey.com | Kevin | Kneupper | 4/17/20 | Fri | 6.3 | La Pura | Review videos of S. Adele discovered online; investigate QuickBox Defendants; edit draft of complaint. |
| kevin@nrappeccovey.com | Kevin | Kneupper | 4/20/20 | Mon | 2.3 | La Pura | Edit draft of Complaint. |
| kevin@nrappeccovey.com | Kevin | Kneupper | 4/21/20 | Tue | 3.5 | La Pura | Draft complaint. |
| kevin@nrappeccovey.com | Kevin | Kneupper | 4/24/20 | Fri | 4.7 | La Pura | Draft complaint. |
| kevin@nrappeccovey.com | Kevin | Kneupper | 4/27/20 | Mon | 1.2 | La Pura | Draft complaint. |
| cyclone@nrappeccovey.com | Cyclone | Covey | 4/28/20 | Tue | 0.1 | La Pura | Set up relevant Google alerts related to defendants |

| | | | | | | |
|------------------------|---------|----------|---------|-----|--------------|--|
| kevin@nrappecovery.com | Cyclone | Covey | 5/6/20 | Wed | 0.2 La Pura | email update to client |
| kevin@nrappecovery.com | Cyclone | Kneupper | 5/15/20 | Fri | 4 La Pura | Review and edit draft of complaint. |
| kevin@nrappecovery.com | Cyclone | 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 copy for network of companies associated with Doe scammers and attempt to identify Does. |
| kevin@nrappecovery.com | Cyclone | 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. |
| kevin@nrappecovery.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@nrappecovery.com | Cyclone | Kneupper | 5/19/20 | Tue | 3.8 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. |
| kevin@nrappecovery.com | Cyclone | Covey | 5/19/20 | Tue | 3.2 La Pura | Save relevant websites to populate data in spreadsheet, give full assignment to B Manning, continue saving websites and adding to spreadsheet, review website data with K Kneupper, begin saving all websites that use Komnetive scripts, phone conference w Kneupper |
| kevin@nrappecovery.com | Cyclone | Covey | 5/20/20 | Wed | 8.4 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@nrappecovery.com | Cyclone | Kneupper | 5/20/20 | Wed | 4 La Pura | Sour web for websites attributed to companies registered by Elinor Spector, add companies and URLs to complaint spreadsheet, archive websites |
| kevin@nrappecovery.com | Cyclone | Covey | 5/21/20 | Thu | 7.5 La Pura | Edit draft of complaint. |
| kevin@nrappecovery.com | Cyclone | Kneupper | 5/21/20 | Thu | 8.2 La Pura | Continue working on list of websites for complaint |
| kevin@nrappecovery.com | Cyclone | Covey | 5/22/20 | Fri | 4 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. |
| kevin@nrappecovery.com | Cyclone | Covey | 5/22/20 | Fri | 4 La Pura | Complete list of websites for complaint of companies registered by Elinor Spector |
| kevin@nrappecovery.com | Cyclone | Kneupper | 5/23/20 | Sat | 3.2 La Pura | Edit draft of complaint. |
| kevin@nrappecovery.com | Cyclone | Covey | 5/23/20 | Sat | 3.2 La Pura | Review false front websites; draft complaint. |
| kevin@nrappecovery.com | Cyclone | Kneupper | 5/25/20 | Mon | 2.9 La Pura | Research QuickBox employees and past business activities; edit draft of complaint. |
| kevin@nrappecovery.com | Cyclone | Kneupper | 5/28/20 | Thu | 6.8 La Pura | Review 2Chads archived materials and old website versions; research background of QuickBox and 2Chads employees; edit draft of complaint. |
| kevin@nrappecovery.com | Cyclone | Kneupper | 5/29/20 | Fri | 2.2 La Pura | Research information relating to 2Chads; edit draft of complaint. |
| kevin@nrappecovery.com | Cyclone | Kneupper | 6/1/20 | Mon | 5.3 La Pura | Research information relating to 2Chads and QuickBox; edit draft of complaint. |
| kevin@nrappecovery.com | Cyclone | Kneupper | 6/2/20 | Tue | 4.8 La Pura | Search for and review videos from QuickBox executive team; edit draft of complaint. |
| kevin@nrappecovery.com | Cyclone | Kneupper | 6/3/20 | Wed | 6.8 La Pura | Investigate Komnetive Facebook posts and videos; research information relating to FunnelKommetk product and Komnetive involvement in merchant processing; edit draft complaint; e-mail C. Covey regarding preservation of FunnelKommetk website. |
| kevin@nrappecovery.com | Cyclone | Kneupper | 6/4/20 | Thu | 4.4 La Pura | Review M. Martorano videos; edit draft of complaint. |
| kevin@nrappecovery.com | Cyclone | Covey | 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 Komnetive online; edit draft of complaint. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/8/20 | Mon | 0.7 La Pura | Call w K Kneupper RE: Komnetive loadbalancing and research websites and facebook pages |
| kevin@nrappecovery.com | Cyclone | Covey | 6/9/20 | Tue | 10.4 La Pura | Search for document information regarding loadbalancing functionality in Komnetive; review third party technical documentation regarding Komnetive software; review Facebook page for Komnetive and e-mail C. Covey regarding same; conference with C. Covey regarding loadbalancing functionality; edit draft of complaint. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/10/20 | Wed | 0.2 La Pura | Search for and review prior lawsuits against Komnetive; e-mail C. Covey regarding lawsuits by former CTO of Komnetive; review posts and various materials on Komnetive Facebook page; review spreadsheet of shell companies and e-mail C. Covey regarding same; draft complaint. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/10/20 | Wed | 8.3 La Pura | email to K Kneupper RE: spreadsheet of defendants, emails to client RE: update |
| kevin@nrappecovery.com | Cyclone | Covey | 6/11/20 | Thu | 0.3 La Pura | Review shell company spreadsheet; search for information regarding shell companies; draft complaint. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/11/20 | Thu | 9.7 La Pura | review email from K Kneupper concerning refund to client and respond to same |
| kevin@nrappecovery.com | Cyclone | Covey | 6/12/20 | Fri | 1.4 La Pura | Edit draft of complaint; e-mail C. Covey regarding draft. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/12/20 | Fri | 6.3 La Pura | edit draft of complaint; prepare complaint and exhibits for filing; file complaint. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/14/20 | Sun | 0.1 La Pura | discuss plan for service with K Kneupper |
| kevin@nrappecovery.com | Cyclone | Covey | 6/15/20 | Mon | 0.3 La Pura | discuss service with Rapid Legal |
| kevin@nrappecovery.com | Cyclone | Covey | 6/15/20 | Mon | 0.1 La Pura | E-mail C. Covey regarding filing. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/16/20 | Tue | 0.1 La Pura | phone call with service vendor to answer their questions. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/17/20 | Wed | 0.3 La Pura | Review quote for service of defendants, speak to Rapid Legal Rep, speak with K Kneupper RE: same |
| kevin@nrappecovery.com | Cyclone | Covey | 6/17/20 | Wed | 0.2 La Pura | E-mail C. Covey regarding summons; conference with C. Covey regarding same. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/18/20 | Thu | 1.8 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 |
| kevin@nrappecovery.com | Cyclone | Covey | 6/18/20 | Thu | 0.2 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@nrappecovery.com | Cyclone | Covey | 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@nrappecovery.com | Cyclone | Covey | 6/19/20 | Fri | 0.4 La Pura | address. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/20/20 | Sat | 0.6 La Pura | Email memo to K Kneupper RE: best course of action to get service on La Pura defendants |
| kevin@nrappecovery.com | Cyclone | Covey | 6/21/20 | Sun | 0.8 La Pura | Research cases discussing service under Section 1758.5 and email memo RE: same to K Kneupper |
| kevin@nrappecovery.com | Cyclone | Covey | 6/22/20 | Mon | 0.9 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 |
| kevin@nrappecovery.com | Cyclone | Covey | 6/22/20 | Mon | 0.4 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 Komnetive defendant. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/23/20 | Tue | 1.1 La Pura | Complete entry of information in Rapid Legal for all Spector defendants, re-check CASOs website to ensure Spector is still registered agent for the 64 defendants, complete service order. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/24/20 | Wed | 0.1 La Pura | Email process server regarding service on E. Spector. |
| kevin@nrappecovery.com | Cyclone | Covey | 6/25/20 | Thu | 0.1 La Pura | E-mail C. Covey regarding filing proof of service. |
| kevin@nrappecovery.com | Cyclone | Covey | 7/1/20 | Wed | 1.4 La Pura | Draft CIPRA letter; e-mail C. Covey regarding same. |
| kevin@nrappecovery.com | Cyclone | Covey | 7/3/20 | Fri | 0.1 La Pura | Review notice of service and e-mail S. Garcia regarding filing. |
| kevin@nrappecovery.com | Cyclone | Covey | 7/9/20 | Thu | 0.2 La Pura | Conference with C. Covey and attorneys for Komnetive regarding agreement on service waiver and response time. |
| | | | | | TOTAL | 287.87 |

EXHIBIT 5

**EXPENSES GROUPED
BY DATE**

Account Transactions
 Kneupper & Covey PC
 For the period August 1, 2018 to November 30, 2024
 La Pura - Tanv Quickbox

| Date | Source | Description | Classification | Reference | Debit | Credit | Gross Account | Related account |
|-------------|-----------------|---|-------------------|------------------------|----------|--------|-------------------------------------|---------------------------|
| 29 Feb 2020 | Payable Invoice | Montage Legal Group | Message | 9791 | 2,759.00 | 0.00 | 2,759.00 Outsourced legal services | 2000 - Accounts Payable |
| 31 Mar 2020 | Payable Invoice | Montage Legal Group | Message | 10025 | 2,309.50 | 0.00 | 2,309.50 Outsourced legal services | 2000 - Accounts Payable |
| 26 Jun 2020 | Spent Money | Rapid legal | Message | | 413.00 | 0.00 | 413.00 PI/Service of Process | 2000 - Accounts Payable |
| 26 Jun 2020 | Spent Money | Rapid legal | Message | | 1,692.00 | 0.00 | 1,692.00 PI/Service of Process | 2000 - Accounts Payable |
| 26 Jun 2020 | Spent Money | Rapid legal | Message | | 495.60 | 0.00 | 495.60 PI/Service of Process | 2000 - Accounts Payable |
| 26 Jun 2020 | Spent Money | Rapid legal - Serving Legal Papers | Message | | 1,692.00 | 0.00 | 1,692.00 PI/Service of Process | 2000 - Accounts Payable |
| 26 Jun 2020 | Spent Money | Rapid legal - Serving Legal Papers | Message | | 991.20 | 0.00 | 991.20 PI/Service of Process | 2000 - Accounts Payable |
| 30 Jun 2020 | Spent Money | Forensic Investigator - Website Owner | Message | 3985602-15 | 20.00 | 0.00 | 20.00 Software & Internet Support | 2000 - Accounts Payable |
| 02 Jul 2020 | Payable Invoice | Rapid legal - Serving Legal Papers | Expert/Consultant | #12885 | 157.78 | 0.00 | 157.78 Agency/Professional Services | 2850 - Tracking Transfers |
| 09 Jul 2020 | Payable Invoice | Nationwide Legal, LLC | Message | 36533006-01,3653006-02 | 340.72 | 0.00 | 340.72 PI/Service of Process | 2000 - Accounts Payable |
| 15 Jul 2020 | Spent Money | Rapid legal - Serving Legal Papers | Message | 19383 | 30.00 | 0.00 | 30.00 Outsourced legal services | 2000 - Accounts Payable |
| 29 Jul 2020 | Spent Money | Rapid legal - Serving Legal Papers | Message | | 420.00 | 0.00 | 420.00 PI/Service of Process | 2000 - Accounts Payable |
| 31 Jul 2020 | Spent Money | Deadlines On Demand | Software | | 320.08 | 0.00 | 320.08 PI/Service of Process | 2000 - Accounts Payable |
| 31 Aug 2020 | Spent Money | Deadlines On Demand | Software | | 20.00 | 0.00 | 20.00 Software & Internet Support | 2000 - Accounts Payable |
| 15 Sep 2020 | Spent Money | Clark County Courts | Software | | 15.00 | 0.00 | 15.00 Software & Internet Support | 2000 - Accounts Payable |
| 15 Sep 2020 | Spent Money | Clark County Courts | Filing Fee | | 2.08 | 0.00 | 2.08 Court Costs | 2000 - Accounts Payable |
| 10 Oct 2020 | Spent Money | Deadlines On Demand | Software | | 69.50 | 0.00 | 69.50 Court Costs | 2000 - Accounts Payable |
| 31 Oct 2020 | Payable Invoice | Interfly Legal Corp. of Orange County | Message | CC 22858 | 632.38 | 0.00 | 632.38 Office Expenses | 2000 - Accounts Payable |
| 01 Nov 2020 | Spent Money | Deadlines On Demand | Software | | 15.00 | 0.00 | 15.00 Software & Internet Support | 2000 - Accounts Payable |
| 25 Nov 2020 | Spent Money | FedEx | Overnight | | 37.00 | 0.00 | 37.00 Postage | 2000 - Accounts Payable |
| 30 Nov 2020 | Spent Money | Deadlines On Demand | Software | | 15.00 | 0.00 | 15.00 Software & Internet Support | 2000 - Accounts Payable |
| 31 Jan 2021 | Spent Money | Deadlines On Demand | Software | | 20.00 | 0.00 | 20.00 Software & Internet Support | 2000 - Accounts Payable |
| 01 Mar 2021 | Spent Money | Deadlines On Demand | Software | | 20.00 | 0.00 | 20.00 Software & Internet Support | 2000 - Accounts Payable |
| 12 Mar 2021 | Spent Money | Deadlines On Demand | Software | | 382.50 | 0.00 | 382.50 Contract Labor | 2000 - Accounts Payable |
| 29 Mar 2021 | Payable Invoice | Andrea Callas Reed - Rule 11 - Tan V Quickbox | Expert/Consultant | Contract Payment | 549.00 | 0.00 | 549.00 Contract Labor | 2000 - Accounts Payable |
| 29 Mar 2021 | Payable Invoice | Andrea Callas Reed - Rule 11 - Tan V Quickbox | Expert/Consultant | Contract Payment | 2,066.50 | 0.00 | 2,066.50 Contract Labor | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 20.00 | 0.00 | 20.00 Software & Internet Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 20.00 | 0.00 | 20.00 Software & Internet Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 15.00 | 0.00 | 15.00 Software & Internet Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 15.00 | 0.00 | 15.00 Software & Internet Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 11.00 | 0.00 | 11.00 Software & Internet Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 11.00 | 0.00 | 11.00 Software & Internet Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 72.73 | 0.00 | 72.73 Office Expenses | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 16.96 | 0.00 | 16.96 Postage | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 35.48 | 0.00 | 35.48 Postage | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 118.05 | 0.00 | 118.05 PI/Service of Process | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 457.55 | 0.00 | 457.55 PI/Service of Process | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 5.00 | 0.00 | 5.00 Office Expenses | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 6.62 | 0.00 | 6.62 Office Expenses | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 148.64 | 0.00 | 148.64 Postage | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 41.44 | 0.00 | 41.44 Postage | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 185.60 | 0.00 | 185.60 Postage | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 67.25 | 0.00 | 67.25 PI/Service of Process | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 136.00 | 0.00 | 136.00 PI/Service of Process | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 28.90 | 0.00 | 28.90 Investigations Expense | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 441.56 | 0.00 | 441.56 Litigation Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 187.49 | 0.00 | 187.49 Litigation Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 202.14 | 0.00 | 202.14 Litigation Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 93.74 | 0.00 | 93.74 Litigation Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 17.40 | 0.00 | 17.40 Postage | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 29.20 | 0.00 | 29.20 Postage | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 61.73 | 0.00 | 61.73 Software & Internet Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 21.07 | 0.00 | 21.07 Software & Internet Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 186.39 | 0.00 | 186.39 Software & Internet Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 17.40 | 0.00 | 17.40 Postage | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 8.29 | 0.00 | 8.29 Office Expenses | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 0.88 | 0.00 | 0.88 Postage | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 17.40 | 0.00 | 17.40 Postage | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 46.84 | 0.00 | 46.84 Office Expenses | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 16.00 | 0.00 | 16.00 Postage | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 50.29 | 0.00 | 50.29 Software & Internet Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 1,256.50 | 0.00 | 1,256.50 Litigation Support | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 404.00 | 0.00 | 404.00 PI/Service of Process | 2000 - Accounts Payable |
| 03 May 2021 | Spent Money | Deadlines On Demand | Software | | 79.00 | 0.00 | 79.00 PI/Service of Process | 2000 - Accounts Payable |

| | | | | | | | | |
|-------------|-----------------|--|---------------------------|----------|------|----------|-----------------------------|--------------------------|
| 05 Sep 2022 | Payable Invoice | Veritek, LLC | 5932320 | 395.24 | 0.00 | 395.24 | Litigation Support | 2000 - Accounts Payable |
| 07 Sep 2022 | Spent Money | CVS - Leanne Tan Deposition - per key/vinyls could not find the receipt) | | 3.74 | 0.00 | 3.74 | Travel Expenses | Annex Blue Business Cash |
| 13 Sep 2022 | Spent Money | Mediocrisis Prima Leanne Tan deposition | 20210867 | 20.00 | 0.00 | 20.00 | Travel Expenses | Annex Blue Business Cash |
| 15 Sep 2022 | Spent Money | USPS - POS to Strunk | 028 | 0.84 | 0.00 | 0.84 | Postage | Annex Blue Business Cash |
| 15 Sep 2022 | Spent Money | USPS - RFPs | 028 | 4.20 | 0.00 | 4.20 | Postage | Annex Blue Business Cash |
| 27 Sep 2022 | Payable Invoice | Regus Management Group | AZ2991789 | 176.40 | 0.00 | 176.40 | Litigation Support | 2000 - Accounts Payable |
| 04 Oct 2022 | Payable Invoice | Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of David H. Press | 04000004889 | 2,013.30 | 0.00 | 2,013.30 | Litigation Support | 2000 - Accounts Payable |
| 04 Oct 2022 | Payable Invoice | Elizabeth Galt Court Reporting, LLC | 114060 | 2,143.56 | 0.00 | 2,143.56 | Litigation Support | 2000 - Accounts Payable |
| 05 Oct 2022 | Payable Invoice | Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Jonathan Trivlas | 00000004848 | 482.00 | 0.00 | 482.00 | Travel Expenses | 2000 - Accounts Payable |
| 10 Oct 2022 | Payable Invoice | Natimwide Legal, LLC - Tan v. Quickbox | | 75.00 | 0.00 | 75.00 | Postage | 2000 - Accounts Payable |
| 10 Oct 2022 | Payable Invoice | Suzzy Garcia - Stamps | | 8.40 | 0.00 | 8.40 | Postage | 2000 - Accounts Payable |
| 10 Oct 2022 | Payable Invoice | Veritek Court Reporters, Inc. | 224851585 | 1,428.00 | 0.00 | 1,428.00 | Litigation Support | 2000 - Accounts Payable |
| 12 Oct 2022 | Payable Invoice | NarrowPath Investigations, Inc. | 30400000000 | 1,544.70 | 0.00 | 1,544.70 | Litigation Support | 2000 - Accounts Payable |
| 17 Oct 2022 | Payable Invoice | NarrowPath Investigations, Inc. | CC 227422 | 239.24 | 0.00 | 239.24 | Travel Expenses | 2000 - Accounts Payable |
| 19 Oct 2022 | Payable Invoice | Integrity Legal Corp. of Orange County - Tan v. Quickbox et al. | CC 227422 | 100.85 | 0.00 | 100.85 | Litigation Support | 2000 - Accounts Payable |
| 31 Oct 2022 | Payable Invoice | FetEx - USDC Southern District of CA | 553191018 | 20.85 | 0.00 | 20.85 | Postage | Annex Blue Business Cash |
| 10 Nov 2022 | Spent Money | USPS - CLRA Letter | 00000004858 | 17.15 | 0.00 | 17.15 | Litigation Support | 2000 - Accounts Payable |
| 08 Nov 2022 | Spent Money | USPS - CLRA Letter | 282 | 7.85 | 0.00 | 7.85 | Postage | Annex Blue Business Cash |
| 08 Nov 2022 | Spent Money | USPS - CLRA Letter | 282 | 7.85 | 0.00 | 7.85 | Postage | Annex Blue Business Cash |
| 08 Nov 2022 | Spent Money | USPS - CLRA Letter | 282 | 7.85 | 0.00 | 7.85 | Postage | Annex Blue Business Cash |
| 16 Nov 2022 | Spent Money | Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Shaun Lavale | 555401698 | 1,172.60 | 0.00 | 1,172.60 | Litigation Support | 2000 - Accounts Payable |
| 21 Nov 2022 | Spent Money | Georgia Northern District Court - motion to quash filing | AGANDC-1271350 | 49.00 | 0.00 | 49.00 | Court Costs | Annex Blue Business Cash |
| 22 Nov 2022 | Payable Invoice | Judicial West | 581158 | 6,375.00 | 0.00 | 6,375.00 | Litigation Support | 2000 - Accounts Payable |
| 22 Nov 2022 | Payable Invoice | Cydone Covey - Flight - Dec 2022 LA Trip | | 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 | CC 227514 | 57.00 | 0.00 | 57.00 | Litigation Support | 2000 - Accounts Payable |
| 05 Dec 2022 | Payable Invoice | Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Jonathan Trivlas | 0000005644 | 231.00 | 0.00 | 231.00 | Travel Expenses | 2000 - Accounts Payable |
| 05 Dec 2022 | Payable Invoice | Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Jonathan Trivlas | AZ2100198 | 1,876.13 | 0.00 | 1,876.13 | Litigation Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Jonathan Trivlas | AZ2120270 | 1,416.16 | 0.00 | 1,416.16 | Litigation Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC - Deposition of Jonathan Trivlas | PH1-IndoorElectric-334236 | 57.00 | 0.00 | 57.00 | Travel Expenses | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Beetle Ants - Mkt | | 3.00 | 0.00 | 3.00 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | 774734 | 35.00 | 0.00 | 35.00 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | 735029 | 54.03 | 0.00 | 54.03 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 42.37 | 0.00 | 42.37 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 15.00 | 0.00 | 15.00 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 52.50 | 0.00 | 52.50 | Litigation Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 49.00 | 0.00 | 49.00 | Court Costs | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 105.00 | 0.00 | 105.00 | Travel Expenses | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 77.00 | 0.00 | 77.00 | Litigation Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 26.80 | 0.00 | 26.80 | Postage | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 15.00 | 0.00 | 15.00 | Software & Internet Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 0.89 | 0.00 | 0.89 | Software & Internet Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 225.00 | 0.00 | 225.00 | Travel Expenses | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 52.50 | 0.00 | 52.50 | Litigation Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 3.20 | 0.00 | 3.20 | Investigations Expense | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 15.00 | 0.00 | 15.00 | Software & Internet Support | K&C Chase CC |
| 14 Dec 2022 | Spent Money | Uber | | 180.00 | 0.00 | 180.00 | Travel Expenses | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 80.00 | 0.00 | 80.00 | Travel Expenses | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 27.41 | 0.00 | 27.41 | Postage | K&C Chase CC |
| 14 Dec 2022 | Spent Money | Uber | | 2,300.46 | 0.00 | 2,300.46 | Litigation Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 899.00 | 0.00 | 899.00 | Litigation Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 1,326.95 | 0.00 | 1,326.95 | Litigation Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 21.54 | 0.00 | 21.54 | Office Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 30.00 | 0.00 | 30.00 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 8.03 | 0.00 | 8.03 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 39.45 | 0.00 | 39.45 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 406.29 | 0.00 | 406.29 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 60.00 | 0.00 | 60.00 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 16.99 | 0.00 | 16.99 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 358.53 | 0.00 | 358.53 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 9.00 | 0.00 | 9.00 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 13.90 | 0.00 | 13.90 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 140.53 | 0.00 | 140.53 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 27.59 | 0.00 | 27.59 | Postage | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 4.89 | 0.00 | 4.89 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 1,417.80 | 0.00 | 1,417.80 | Travel Expenses | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 29.95 | 0.00 | 29.95 | Software & Internet Support | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 2,300.46 | 0.00 | 2,300.46 | Litigation Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 899.00 | 0.00 | 899.00 | Litigation Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 1,326.95 | 0.00 | 1,326.95 | Litigation Support | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 21.54 | 0.00 | 21.54 | Office Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 30.00 | 0.00 | 30.00 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 8.03 | 0.00 | 8.03 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 39.45 | 0.00 | 39.45 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 406.29 | 0.00 | 406.29 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 60.00 | 0.00 | 60.00 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 16.99 | 0.00 | 16.99 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 358.53 | 0.00 | 358.53 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 9.00 | 0.00 | 9.00 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 13.90 | 0.00 | 13.90 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 140.53 | 0.00 | 140.53 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 27.59 | 0.00 | 27.59 | Postage | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 4.89 | 0.00 | 4.89 | Travel Expenses | Annex Blue Business Cash |
| 14 Dec 2022 | Spent Money | Uber | | 1,417.80 | 0.00 | 1,417.80 | Travel Expenses | 2000 - Accounts Payable |
| 14 Dec 2022 | Spent Money | Uber | | 29.95 | 0.00 | 29.95 | Software & Internet Support | Annex Blue Business Cash |

| | | | | | | | | | |
|-------------|-----------------|---|----------------------------|----------------------------|------------|------|------------|-----------------------------|-------------------------|
| 20 Mar 2024 | Payable Invoice | Sprint Process, LLC - For service of Deposition Subpoena to Brett Walker | Messenger | 3229 | 130.00 | 0.00 | 130.00 | Process of Deposition | 2000 - Accounts Payable |
| 22 Mar 2024 | Payable Invoice | Paszkiewicz Court Reporting - Deposition of Bernita Jackson | Stenographer | 328553 | 680.00 | 0.00 | 680.00 | Litigation Support | 2000 - Accounts Payable |
| 22 Mar 2024 | Payable Invoice | Paszkiewicz Court Reporting - Deposition of Bernita Jackson | Stenographer | 653129 | 837.75 | 0.00 | 837.75 | Litigation Support | 2000 - Accounts Payable |
| 28 Mar 2024 | Payable Invoice | Planet Depos, LLC - TRANSCRIPT WITH INDEX OF Kerne Merrifield, Separate Designee | 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 | 653910 | 574.00 | 0.00 | 574.00 | Litigation Support | 2000 - Accounts Payable |
| 01 Apr 2024 | Payable Invoice | Mazra, LLC - Tan v Quick Box | Stenographer | 2024022371 | 9.43 | 0.00 | 9.43 | Software & Internet Support | 2000 - Accounts Payable |
| 01 Apr 2024 | Payable Invoice | Mazra, LLC - Tan v Quick Box | Stenographer | 6024022371 | 3.06 | 0.00 | 3.06 | Software & Internet Support | 2000 - Accounts Payable |
| 03 Apr 2024 | Payable Invoice | Ronald Mann - Deposition | Expert/Consultant | 2024022371 | 20.00 | 0.00 | 20.00 | Expert Witness Expense | 2000 - Accounts Payable |
| 04 Apr 2024 | Payable Invoice | Ronald Mann - Report and preparing for deposition | Expert/Consultant | Report and Deposition Prep | 6,370.00 | 0.00 | 6,370.00 | Expert Witness Expense | 2000 - Accounts Payable |
| 04 Apr 2024 | Payable Invoice | Baker Consulting - Consulting Fees in Tan v Quick Box for March 2024 | Expert/Consultant | Report and Deposition Prep | 271,170.00 | 0.00 | 271,170.00 | 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 | 16,380.00 | 0.00 | 16,380.00 | Expert Witness Expense | 2000 - Accounts Payable |
| 22 Apr 2024 | Spent Money | WSS Press On - Deposition of Tan v Quick Box (Litigation) | Software | March 2024 Deposition | 3,055.00 | 0.00 | 3,055.00 | Reimbursable Expense | 2000 - Accounts Payable |
| 22 Apr 2024 | Spent Money | WSS Press On - Deposition of Tan v Quick Box (Litigation) | Software | March 2024 Deposition | 1,251.50 | 0.00 | 1,251.50 | Software & Internet Support | 2000 - Accounts Payable |
| 23 Apr 2024 | Payable Invoice | Mediatek 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 |
| 27 Apr 2024 | Spent Money | Mediatek Deposition Services, Inc. | Mediation | 5946 | 20,000.00 | 0.00 | 20,000.00 | Mediation Costs | 2000 - Accounts Payable |
| 01 May 2024 | Payable Invoice | PreFlight Parking - Consulting Fees in Tan v Quick Box for April 2024 Reviewing Deposition | Expert/Consultant | NZSLUD3HFZU | 55.74 | 0.00 | 55.74 | Travel Expenses | 2000 - Accounts Payable |
| 01 May 2024 | Payable Invoice | Ullicoort Corporation - Leanne Tan, et al vs. Quick Box, LLC, et al. - Bruce Stomton - Transcript | Stenographer | 2024022372 | 2,720.00 | 0.00 | 2,720.00 | Reimbursable Expense | 2000 - Accounts Payable |
| 01 May 2024 | Payable Invoice | Ullicoort Corporation - Leanne Tan, et al vs. Quick Box, LLC, et al. - Bruce Stomton - Video | Stenographer | 13355 | 2,313.52 | 0.00 | 2,313.52 | Litigation Support | 2000 - Accounts Payable |
| 01 May 2024 | Payable Invoice | Ullicoort Corporation - Leanne Tan, et al vs. Quick Box, LLC, et al. - Keith S. Lerner - Transcript | Stenographer | 13357 | 2,194.75 | 0.00 | 2,194.75 | Litigation Support | 2000 - Accounts Payable |
| 01 May 2024 | Payable Invoice | Ullicoort Corporation - Leanne Tan, et al vs. Quick Box, LLC, et al. - Keith S. Lerner - Video | Stenographer | 13352 | 2,319.40 | 0.00 | 2,319.40 | Litigation Support | 2000 - Accounts Payable |
| 01 May 2024 | Payable Invoice | Ullicoort Corporation - Leanne Tan, et al vs. Quick Box, LLC, et al. - Kerne Merrifield - Transcript | Stenographer | 13354 | 433.75 | 0.00 | 433.75 | Litigation Support | 2000 - Accounts Payable |
| 01 May 2024 | Payable Invoice | Ullicoort Corporation - Leanne Tan, et al vs. Quick Box, LLC, et al. - Kerne Merrifield - Video | Stenographer | 13356 | 2,175.21 | 0.00 | 2,175.21 | Litigation Support | 2000 - Accounts Payable |
| 01 May 2024 | Payable Invoice | Ullicoort Corporation - Leanne Tan, et al vs. Quick Box, LLC, et al. - Stephen Craig Molt - Transcript | Stenographer | 13364 | 1,071.75 | 0.00 | 1,071.75 | Litigation Support | 2000 - Accounts Payable |
| 01 May 2024 | Payable Invoice | Ullicoort Corporation - Leanne Tan, et al vs. Quick Box, LLC, et al. - Stephen Craig Molt - Video | Stenographer | 13367 | 287.50 | 0.00 | 287.50 | Litigation Support | 2000 - Accounts Payable |
| 02 May 2024 | Spent Money | Acce Parking - For Kevin Tan v Quick Box (LA Para) | Stenographer | A24050047 | 342.50 | 0.00 | 342.50 | Litigation Support | 2000 - Accounts Payable |
| 10 May 2024 | Spent Money | Pager Service Center - 328CQ/010624 | Mails/Hotel/Transportation | April 2024 | 50.00 | 0.00 | 50.00 | Travel Expenses | 2000 - Accounts Payable |
| 10 May 2024 | Spent Money | Pager Service Center - research for Judge Linda Lopez's trial calendars | Online Legal Research | 6123997-Q12024 | 19.70 | 0.00 | 19.70 | Investigations Expense | 2000 - Accounts Payable |
| 10 May 2024 | Spent Money | FedEx - Southern District of California - San Diego, CA | Overnight | 6123997-Q12024 | 1.20 | 0.00 | 1.20 | Investigations Expense | 2000 - Accounts Payable |
| 13 May 2024 | Spent Money | FedEx - Tony Puzza - Haku, HI | Overnight | 607969185 | 30.73 | 0.00 | 30.73 | Postage | 2000 - Accounts Payable |
| 17 May 2024 | Spent Money | Intefry Legal Corp. of Orange County - for the printing and delivery of courtesy copies to Hon. Lopez of Dkt Nos. 444-446 | Overnight | 608187588 | 63.07 | 0.00 | 63.07 | Postage | 2000 - Accounts Payable |
| 17 May 2024 | Spent Money | FedEx - Clerk's Office - Hen, Lopez - San Diego, CA | Messenger | CC 228888 | 16,899.99 | 0.00 | 16,899.99 | Office Expenses | 2000 - Accounts Payable |
| 18 May 2024 | Spent Money | Cydonia Covey - Reimbursement for Tan v Quickbox travel - 521-523/24 | Messenger | 608624374 | 24.36 | 0.00 | 24.36 | Postage | 2000 - Accounts Payable |
| 23 May 2024 | Spent Money | Hung Thuan - La Para (mediation) | Overnight | Reimbursement | 1,056.20 | 0.00 | 1,056.20 | Travel Expenses | 2000 - Accounts Payable |
| 23 May 2024 | Spent Money | Kokkar Estacion | Mails/Hotel/Transportation | 2024022373 | 281.73 | 0.00 | 281.73 | Travel Expenses | 2000 - Accounts Payable |
| 23 May 2024 | Spent Money | Kokkar Estacion | Mails/Hotel/Transportation | 2024022373 | 73.81 | 0.00 | 73.81 | Travel Expenses | 2000 - Accounts Payable |
| 23 May 2024 | Spent Money | Burger Joint - La Para (mediation) | Mails/Hotel/Transportation | 2024022373 | 281.73 | 0.00 | 281.73 | Travel Expenses | 2000 - Accounts Payable |
| 23 May 2024 | Spent Money | Uber | Mails/Hotel/Transportation | 2024022373 | 72.55 | 0.00 | 72.55 | Travel Expenses | 2000 - Accounts Payable |
| 23 May 2024 | Spent Money | Uber | Mails/Hotel/Transportation | 2024022373 | 26.05 | 0.00 | 26.05 | Travel Expenses | 2000 - Accounts Payable |
| 23 May 2024 | Spent Money | Uber | Mails/Hotel/Transportation | 2024022373 | 246.39 | 0.00 | 246.39 | Travel Expenses | 2000 - Accounts Payable |
| 23 May 2024 | Spent Money | Planet Depos, LLC - Transcript with index of Joseph Libby | Stenographer | 655266 | 1,755.51 | 0.00 | 1,755.51 | Travel Expenses | 2000 - Accounts Payable |
| 23 May 2024 | Spent Money | Planet Depos, LLC - Video-graphy services for deposition of Joseph Libby | Stenographer | 1222225 | 2,222.25 | 0.00 | 2,222.25 | Litigation Support | 2000 - Accounts Payable |
| 23 May 2024 | Spent Money | Planet Depos, LLC - Video-graphy services for deposition of Joseph Libby | Stenographer | 656267 | 96.43 | 0.00 | 96.43 | Travel Expenses | 2000 - Accounts Payable |
| 24 May 2024 | Spent Money | The J Hotel | Mails/Hotel/Transportation | 2024022372 | 4.38 | 0.00 | 4.38 | Travel Expenses | 2000 - Accounts Payable |
| 24 May 2024 | Spent Money | Planet Depos, LLC - Transcript with index of Steven Baker, Esquire | Mails/Hotel/Transportation | 657657 | 1,371.83 | 0.00 | 1,371.83 | Travel Expenses | 2000 - Accounts Payable |
| 24 May 2024 | Spent Money | Planet Depos, LLC - TRANSCRIPT WITH INDEX OF Kerne Merrifield, Volume 2 | Stenographer | 657657 | 35.85 | 0.00 | 35.85 | Travel Expenses | 2000 - Accounts Payable |
| 24 May 2024 | Spent Money | Planet Depos, LLC - Video-graphy services for deposition of Tom Chen, Corporate Designee | Stenographer | 663966 | 894.30 | 0.00 | 894.30 | Litigation Support | 2000 - Accounts Payable |
| 28 May 2024 | Spent Money | John Wayne Airport - For Kevin | Stenographer | 654099 | 139.25 | 0.00 | 139.25 | Litigation Support | 2000 - Accounts Payable |
| 01 Jun 2024 | Spent Money | Mazra, LLC - Tan v Quick Box | Mails/Hotel/Transportation | 2024042978 | 48.00 | 0.00 | 48.00 | Travel Expenses | 2000 - Accounts Payable |
| 01 Jun 2024 | Spent Money | Mazra, LLC - Tan v Quick Box | Software | 1420225 | 1,339.16 | 0.00 | 1,339.16 | Travel Expenses | 2000 - Accounts Payable |
| 01 Jun 2024 | Spent Money | Mazra, LLC - Tan v Quick Box | Software | 2024042978 | 38.00 | 0.00 | 38.00 | Software & Internet Support | 2000 - Accounts Payable |
| 01 Jun 2024 | Spent Money | Mazra, LLC - Tan v Quick Box | Software | 2024042978 | 38.00 | 0.00 | 38.00 | Software & Internet Support | 2000 - Accounts Payable |
| 01 Jun 2024 | Spent Money | Mazra, LLC - Tan v Quick Box | Software | 2024042978 | 38.00 | 0.00 | 38.00 | Software & Internet Support | 2000 - Accounts Payable |
| 08 Aug 2024 | Spent Money | Godaddy | Software | 323132229 | 12.17 | 0.00 | 12.17 | Advertising | 2000 - Accounts Payable |
| 01 Oct 2024 | Spent Money | Mazra, LLC - Tan v Quick Box | Software | 2024042974 | 38.00 | 0.00 | 38.00 | Software & Internet Support | 2000 - Accounts Payable |
| | | | | | 460,273.99 | | 34,058.40 | | |
| | | | | | | | 428,215.59 | | |

EXHIBIT 6

EXPENSES GROUPED BY TYPE

| | | | | | | | | | |
|-------------|-----------------|---|---------------------------|-----------|-------------------|------------------|-------------------|--------------------|-------------------------|
| 01 May 2024 | Payable Invoice | LitCourt Corporation - Leanne Tan, et al vs. Quick Box, LLC, et al - Stephen Craig Mott - Transcript | Stenographer | 13387 | 1,071.75 | 0.00 | 1,071.75 | Litigation Support | 2000 - Accounts Payable |
| 01 May 2024 | Payable Invoice | LitCourt Corporation - Leanne Tan, et al vs. Quick Box, LLC, et al - Stephen Craig Mott - Video | Stenographer | 13389 | 287.50 | 0.00 | 287.50 | Litigation Support | 2000 - Accounts Payable |
| 23 May 2024 | Payable Invoice | Network Deposition Services, Inc. - Leanne Tan vs. Quick Box, LLC, et al - Deposition of Jonathan Trivels | Stenographer | A24060047 | 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 | 652286 | 1,232.25 | 0.00 | 1,232.25 | 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 | 653866 | 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 | | 376,544.62 | 34,029.20 | 342,515.42 | | |

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 |



CONFIDENTIAL



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 |



CONFIDENTIAL