

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KEVIN MCCLINTIC on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

LITHIA MOTORS, INC.,

Defendant.

No. 2:11-cv-00859-RAJ

JOINT DECLARATION OF ROB  
WILLIAMSON AND KIM WILLIAMS IN  
SUPPORT OF MOTION FOR AWARD OF  
ATTORNEYS' FEES AND COSTS AND  
SERVICE AWARD TO THE NAMED  
PLAINTIFF

NOTED ON MOTION CALENDAR:  
October 11, 2012 @ 2:00 pm

We, Rob Williamson and Kim Williams, hereby declare as follows:

1. We are the attorneys for the Plaintiff proposed Settlement Class, and submit this declaration in support of Plaintiff's counsels' Motion for Award of Attorney's Fees and Costs and Service Award to the named Plaintiff, Kevin McClintic.

2. Our firm has filed many class actions alleging violations of the Telephone Consumer Protection Act (49 U.S.C. § 227) arising out of the transmission by businesses of junk faxes, robo-calls, text messages and violations of Do-Not-Call statutes, and Washington state statutes. In a series of cases in the Western District of Washington, we successfully defended preemption challenges to the Washington statute forbidding robo-calls (RCW

1 80.36.400 ("WADAD") in *Hovila v. Tween Brands* (No. 09-0491 RSL) and *Palmer v. Sprint*,  
2 (No. C09-01211 JLR). In *Tween Brands*, defendant sought permission to appeal the ruling  
3 denying preemption in the 9<sup>th</sup> Circuit which was denied. We have also defended a challenge to  
4 the WADAD that it must involve a "conversation" after Judge Settle of this District ruled  
5 adversely to our position in *Cabbage v. The Talbots, Inc.*, (No. 09-911 BHS). After Judge  
6 Settle's ruling, five judges rejected it: Two King County Superior Court Judges, Judge Laura  
7 Inveen in *Hartman v. United Bank Card Servs., Inc.*, King County Superior Court Case No.  
8 10-2-14594-0 SEA) and Judge Susan Craighead (*Maclean v. Stellar Concepts & Design, Inc.*,  
9 King County Superior Court Case No. 10-2-04301-2 SEA), Judge Marsha Pechman of this  
10 District in *Meilleur v. AT&T, Inc.* (No.11-01025 MJP), Judge Robart of this District in  
11 *Hartman v. United Bank Card, Inc., et al.* (No. 11-1753 JLR), and most recently by Judge  
12 Leighton of this District in *Anderson v. Domino's Pizza Inc. et al.* (No. 11-902 RBL). We have  
13 obtained class certification in many cases in state and federal court.  
14  
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16 3. In our cases involving *Tween Brands* and *Assing et al v. Payless Shoe Source et*  
17 *al and Smart Reply, Inc.*, (No. 09- 00915 JCC), opposing counsel was Grant Degginger of Lane  
18 Powell. Mr. Degginger was familiar with our work and experience. Literally within a few  
19 days of filing this case, Mr. Degginger advised us that he had been retained by Lithia and that  
20 Lithia wanted to resolve the case as soon as possible. While Lithia claimed it had various  
21 defenses, including that the texts in question were intended only to be sent to former customers  
22 who had either consented to receive the texts or had implicitly so consented by virtue of that  
23 business relationship, it also preferred to focus efforts on settlement, not litigation.  
24

25 4. Accordingly on July 5, 2012 the parties participated in a mediation session with  
26

1 the Honorable Terrance Lukens (Ret.) of Judicial Arbitration and Mediation Service, who had  
2 served as mediator in *Hovila v. Tween Brands* (No. 09-0491 RSL), *Global Education Services,*  
3 *Inc v. Intuit, Inc.* (No. 09-0944 RSL), *Hartman, et al v. Comcast Business Communications,*  
4 *LLC,* (No. 10-00413 RSL) and other similar cases.

5  
6 5. During the mediation, Counsel exchanged a series of counterproposals on key  
7 aspects of the Settlement, including the parameters of the monetary relief for the Class, and the  
8 meaning and interpretation of the eligibility requirements. The negotiations were lengthy,  
9 adversarial, non-collusive, and at arm's length.

10 6. The parties have not conducted formal discovery, but the informal exchange of  
11 information, both before and during mediation, produced the information and documentation  
12 necessary to evaluate the case and potential settlement.

13  
14 7. The Court initially denied Plaintiff's Motion for Preliminary Settlement  
15 Approval and the Settlement Agreement was modified to address the Court's concerns.  
16 Subsequently, a further amendment to address concerns raised by the Attorney General of  
17 Texas was submitted and the Court approved the settlement. The Court also participated in  
18 working of the notice and claim form to ensure each were consumer friendly and would  
19 encourage participation in the settlement claims process. Notice has been distributed to the  
20 Class via in accordance with the Preliminary Approval Order, and a long form of notice as well  
21 as other documents have been posted to a website maintained by the Settlement Administrator.

22  
23 8. Our law firm worked hard to achieve an excellent settlement for the Plaintiff and  
24 the proposed class, work which included resisting an intervention request that would not have  
25 benefitted the class. When clients do not pay an ongoing hourly fee to their counsel, they  
26

1 typically negotiate an agreement in which counsel's fee is based upon a percentage of any  
2 recovery.

3 9. Class counsel have devoted substantial resources to the prosecution of this case  
4 on a contingency basis with no guarantee that we would be compensated for our time or  
5 reimbursed for our expenses. Because class counsel agreed to prosecute this case on  
6 contingency with no guarantee of ever being paid they faced substantial risk should they  
7 proceed to trial. From the outset, prosecution of this action on behalf of the Class has involved  
8 significant risk, and class counsel has advanced all costs of suit. The risk was ameliorated by  
9 the early offer of Lithia to negotiate a settlement, a decision that could not be predicted when  
10 the case was filed.

11  
12 10. Since our firm first began investigating the claims in this case, we have incurred  
13 more than \$171,541.00 in attorney fees, and \$2875.00 for staff time (28.75 hours at blended  
14 rate of \$100.00 per hour) and expended \$4,863.56 in litigation expenses related to the  
15 prosecution of this action. We estimate we will incur approximately \$17,625.00 in fees (25  
16 hours at the average rate of \$705 per hour) to see this case through to its final resolution,  
17 including the work necessary to oversee that the claims process is properly carried out and  
18 attending the hearing on final approval. Class counsel has spent and will spend 294.95 hours  
19 on investigation, negotiations, litigation of the intervention matter and resolution of this case.  
20 Class counsel's time spent includes approximately 25 additional hours to see this case through  
21 to its final resolution, including the work necessary to oversee that the claims process is  
22 properly carried out and attending the hearing on final approval. Legal assistant time totals  
23 28.75 hours. A detailed itemized record of our firm's time entries for time expended in  
24  
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1 connection with this litigation to date is attached hereto as Exhibit A. A detailed itemized  
2 record of costs expended by our firm in connection with this litigation to date is attached hereto  
3 as Exhibit B.

4 11. The lodestar calculations of Class counsel are based on reasonable hourly rates.  
5 Class counsel set their rates for attorneys and staff members based on a variety of factors,  
6 including among others: the experience, skill and sophistication required for the types of legal  
7 services typically performed; the rates customarily charged in the markets where legal services  
8 are typically performed; and the experience, reputation and ability of the attorneys and staff  
9 members.  
10

11 12. Plaintiff's counsel's firm is a two lawyer firm with no associates, and the two  
12 partners must perform all legal tasks on their cases. It is only because both partners work on  
13 the class action cases that the firm is able to accept and prosecute the cases on behalf of clients  
14 such as Mr. McClintic. Although, based on their experience, the hourly rates of both partners  
15 are high, that experience also permits them to work efficiently and to expend relatively few  
16 hours prosecuting even larger cases.  
17

18 13. Rob Williamson is a graduate of Princeton University in 1966. Rob Williamson  
19 studied Philosophy of Law at University College London for a year, and then attended Harvard  
20 Law School, graduating in 1970. After law school Rob Williamson was in private practice for  
21 a brief period in Los Angeles, and then from 1972 through 1979, Rob Williamson was Director  
22 of Clinical Studies at Southwestern University School of Law, in Los Angeles, and a tenured  
23 law professor teaching Lawyering Skills, Family Law, and Community Property. Rob  
24 Williamson moved to Seattle in 1979 and served as the Regional Training Coordinator for the  
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1 Legal Services Corporation, and then briefly as a Litigation Coordinator for Evergreen Legal  
2 Services. Rob Williamson has been in private practice in Seattle since 1981, first with the law  
3 firm of Davies, Roberts and Reid and with our present firm since it was started in April, 1998.

4  
5 14. Historically, our practice has involved representation of clients on a  
6 contingency-fee basis. We have been involved in class actions since 1996, and over the years  
7 have been awarded attorney fees in class actions like this litigation as well as wage and hour  
8 claims and claims against banks or servicers for fees charged when consumers pay off their  
9 home loans. Rob Williamson's hourly rate has been approved at various rates over that period  
10 of time. In several wage and hour claims brought in 1998 through 2001, the hourly rate for  
11 Rob Williamson's work was approved at \$400.00 to \$500.00 per hour. These include awards  
12 approved by Judges Glenna Hall and James Street in King County, and Judge Michael Leavitt  
13 in Yakima County.

14  
15 15. Rob Williamson has been appointed class counsel as part of orders granting  
16 class certification or approved as class counsel as part of judicial review of a settlement in  
17 approximately 60 cases, in King County Superior Court, the Western District of Washington,  
18 and Whatcom, Yakima and Spokane Counties: approximately 20 of those cases involved  
19 approved settlements of claims brought under the Telephone Consumer Protection Act and  
20 comparable Washington statutes.

21  
22 16. In addition to class action litigation, Rob Williamson has also been involved in  
23 complex personal-injury matters in both state and federal court, primarily in Washington, with  
24 some cases involving railroad injuries in Oregon and Montana, as well as maritime injury  
25 claims. Rob Williamson has represented injured plaintiffs in medical negligence, product  
26

1 liability and federal court multi-district litigation in the latex glove and Vioxx products liability  
2 cases. Our firm has also represented over 150 engineers and oilers with hearing loss claims  
3 against the Washington State Ferries.

4 17. Rob Williamson was co-counsel for the Western Conference Teamsters in the  
5 RICO litigation brought by the United States in New York City, and represented the Western  
6 Conference of Teamsters Pension Trust in various matters involving unfunded pension liability  
7 against employers. Rob Williamson also was privileged to represent several farm workers in a  
8 claim against a grower that was tried in Federal Court in Yakima before a jury which resulted  
9 in the highest verdict for emotional distress damages arising out of violations of the Migrate  
10 Workers Farm Labor Protection Act.

11 18. The lodestar hourly rates at which local courts have approved Rob  
12 Williamson's time have been steadily increasing over the past 6 years. On October 31, 2005,  
13 Judge Mary Yu of the King County Superior Court approved an award to Rob Williamson of  
14 \$425.00/hour in the Wells Fargo litigation. On October 6, 2006, Judge Sharon Armstrong of  
15 King County approved a fee in the *Seebach v. Allied Telesyn, Inc.* (No. 03-2-02520-4) litigation  
16 based on Rob Williamson's declaration in which he claimed a lodestar of \$500.00/hour. In mid-  
17 2009, Judge Coughenour approved Rob Williamson's lodestar at \$760 per hour in the TCPA  
18 robocall case of *Gardner v. Capital Options LLC et al*, (No. 07-1918), a rate that was  
19 submitted and approved by Judge Jones for attorney Kim Stephens of Tousley Brain Stephens  
20 in *Spafford v. Echostar Communications* (No. 06-0479), and by this Court in *Pelletz v.*  
21 *Weyerhaeuser Company* (No. 08-0334 and No.08-0403) as well as Judge Leighton in *Gray's*  
22 *Harbor Adventist Christian Sch. v. Carrier Corp.* (No. 05-5437). In addition, Judge Robart  
23  
24  
25  
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1 approved Rob Williamson's lodestar at \$760 in 2010 in another autodialer solicitation case,  
2 *Baron v. Direct Capital, Inc.* (No. 09-669).

3 19. Kim Williams is a graduate of Whitman College in 1974. Kim Williams was a  
4 Vista Volunteer for the Florida Probation and Parole Commission for one year, and then  
5 attended Willamette University College of Law, graduating in 1978. After law school, Kim  
6 Williams practiced law for 6 years with the firm of Critchlow & Williams in Richland,  
7 Washington, and Kim Williams' practice involved representation of individuals in a variety of  
8 matters, including personal injury, domestic relations and criminal matters. Kim Williams has  
9 been in private practice in Seattle since 1985, first with the law firm of Hafer Price Rinehart &  
10 Schwerin (1985-1989), then with the firm of Davies Roberts & Reid (1989-1998), and with our  
11 present firm since started with Mr. Williamson in April, 1998. Kim Williams' practice at the  
12 Hafer firm involved representation of labor unions and employee benefit trusts, including in  
13 litigation matters, and Kim Williams' practice at the Davies firm was a litigation practice  
14 emphasizing representation of injured persons and consumers, labor unions and their members,  
15 and employee benefit trusts, in a variety of labor and employment, personal injury and other  
16 litigation matters.  
17  
18

19 20. Kim Williams is a member of the Washington and Oregon State Bar  
20 Associations, and admitted to practice in the Western and Eastern Districts of Washington, as  
21 well as the Ninth Circuit Court of Appeals and the United States Supreme Court.  
22

23 21. Over the course of Kim Williams' legal career, Kim Williams has been involved  
24 in complex personal-injury matters in both state and federal court, primarily in Washington, but  
25 also some cases involving railroad injuries in Oregon and Montana, as well as maritime injury  
26



1 claims. Kim Williams has represented numerous clients in medical negligence, product  
2 liability and premises liability litigation. Mr. Williamson and Ms. Williams have also  
3 represented over 150 engineers and oilers with hearing loss claims against the Washington  
4 State Ferries.

5  
6 22. In addition, Kim Williams has been involved multi-district litigation in the  
7 federal court system. On behalf of our firm, for seven years beginning in the late 1990s, Kim  
8 Williams represented over 50 claimants, mostly healthcare providers, with product liability  
9 claims for latex allergy against various latex glove manufacturers. Kim Williams served as  
10 Lead Plaintiffs' Counsel in the Western and Eastern Districts of Washington for latex glove  
11 product liability claimants following remand of their cases from MDL 1148 (United States  
12 District Court, Eastern District of Pennsylvania). In conjunction with co-counsel, Kim  
13 Williams also represented over 30 claimants with products liability claims for myocardial  
14 infarction and stroke against Merck & Company, the former manufacturer of the drug Vioxx, in  
15 MDL 1657 until those cases settled in 2008/2009.

16  
17 23. For the past three years, our practice has consisted almost exclusively of  
18 representation of plaintiffs in consumer class action cases, particularly in cases such as this one  
19 involving claims for violation of the Telephone Consumer Protection Act ("TCPA"), the  
20 Washington Automatic Dialing and Announcing Device statute ("WADAD") and the  
21 Washington Consumer Protection Act ("WCPA").

22  
23 24. Our firm has been appointed class counsel as part of orders granting class  
24 certification or approved as class counsel as part of judicial review of a settlement in  
25 approximately 60 cases, in King County Superior Court, the Western District of Washington,  
26

1 and Whatcom, Yakima and Spokane Counties: approximately 20 of those cases involved  
2 approved settlements of claims brought under the TCPA, WADAD and WCPA, with some also  
3 involving claims for violation of the Fair Debt Collection Practices Act and comparable state  
4 statutes.

5  
6 25. In mid-2009, Judge Coughenour approved Kim Williams' lodestar at \$500 per  
7 hour in the TCPA robocall case of *Gardner v. Capital Options LLC et al*, (No. 07-1918). In  
8 addition, Judge Robart approved Kim Williams' lodestar at \$500 in 2010 in another autodialer  
9 solicitation case, *Baron v. Direct Capital, Inc.*, No. (09-00669 JLR).

10 26. Kim Williams' participation in this litigation, and the expertise Kim Williams  
11 brings to bear in this type of case, has increased dramatically since 2008/2009. Accordingly, it  
12 is reasonable that hourly rate claimed by Kim Williams in this case (\$650), and recently  
13 approved for Kim Williams by this Court in *Global Education Services, Inc. v. Intuit, Inc. et al*,  
14 No. C09-0944 RSL and *Palmer v. Sprint*, (No. 09-01211 JLR) is now higher than it was one  
15 and two years ago, though still lower than hourly rates claimed by some other class action  
16 lawyers litigating such cases, and in line with that claimed by other experienced local class  
17 action lawyers. *See e.g.* Elizabeth Cabraser of the San Francisco and national firm Lieff  
18 Cabraser Heimann & Bernstein, LLP claimed hourly rate of \$850 and Beth Terrell of the  
19 Seattle firm of Terrell Marshall Daudt & Willie claimed hourly rate of \$650 in *Arthur v. Sallie*  
20 *Mae, Inc.*, (No. 10 -00198 JLR).

21  
22  
23 27. Since the *Capital Options* settlement was approved, we have filed and litigated  
24 numerous TCPA, WADAD and other class action cases involving automatic dialing and  
25 announcing devices and pre-recorded messages in the solicitation and debt collection contexts,  
26

1 five of which are currently settled and pending preliminary or final settlement approval.  
2 Williamson & Williams is presently litigating more than a dozen additional class action cases  
3 of this type in King County Superior Court and the Western District of Washington, and the  
4 firm is filing new cases on an ongoing basis. Our firm likely has more experience in class  
5 action litigation under the TCPA and Washington State counterparts than any other firm in  
6 Washington. Accordingly, it is reasonable that hourly rates claimed by Rob Williamson and  
7 Kim Williams in this case are now higher than they were in May 2009, though still lower than  
8 hourly rates claimed by some other class action lawyers litigating such cases. *See e.g.*  
9 Elizabeth Cabraser of the San Francisco and national firm Lieff Cabraser Heimann &  
10 Bernstein, LLP claimed hourly rate of \$850 in *Arthur v. Sallie Mae, Inc.*, (No 10-00198 JLR).  
11

12 28. Further, this Court recently approved Rob Williamson's rate at \$760 per hour in  
13 the ADAD class action case of *Global Education Services, Inc. v. Intuit, Inc. et al*, (No. 09-  
14 0944 RSL) and Judge Robart did the same in the case of *Palmer v. Sprint Solutions, Inc. et al*,  
15 (No. 09-01211 JLR).  
16

17 29. On April 25, 2012, in a comparable case involving a retailer defendant and  
18 Smart Reply, *Hovila v. Tween Brands* (No. 09-0491 RSL) Judge Lasnik approved these rates  
19 for class counsel observing that while the rates were at the high end for Seattle counsel, they  
20 were justified by counsel's excellent work.  
21

22 30. Class counsel seek an attorneys' fee award of \$595,136.64 based on a lodestar  
23 of \$192,041.00 (120.20 Williams hours x \$650 per hour [\$78,130.00] plus 146.10 Williamson  
24 hours x \$760 per hour [\$111,036.00] plus staff time of 28.75 hours x blended rate of \$100 per  
25 hour [\$2875.00]). The rates charged for attorneys and staff members working on this matter  
26

1 range from \$100.00 to \$760.00, with the majority of the work performed by Mr. Williamson at  
2 an hourly rate of \$760.00 and Ms. Williams at an hourly rate of \$650.00. The \$100.00 rate is a  
3 blended rate for staff of varying levels of experience from \$50.00 per hour for less experienced  
4 staff to \$175.00 for a legal assistant with over 10 years of experience. In light of the detailed  
5 breakdown provided by counsel in their respective declarations, and the arguments offered  
6 above, Class counsel submits that their lodestar calculations are based on reasonable rates.

7  
8 31. In agreeing to represent the Class on a contingent basis, Class counsel risked our  
9 own resources with no guarantee of recovery. Class Counsel will not seek any fees beyond the  
10 present fee request for the future work they expect to devote to the litigation.

11 32. As stated above, throughout the course of this litigation, Class counsel had to  
12 incur out-of-pocket costs totaling \$4,863.56. The litigation expenses Class counsel incurred in  
13 this case include the following: (1) copying, mailing, and messenger expenses; (2) computer  
14 research expenses; (3) factual investigation expenses; and (4) travel expenses. Class counsel  
15 put forward these out-of-pocket costs without assurance that they would ever be repaid.

16  
17 33. In addition, Class counsel asks the Court to award an incentive payment to the  
18 named Plaintiff in the amount of \$10,000. Plaintiff came forward to serve as a proposed class  
19 representative, kept abreast of the litigation, was deposed and approved the proposed settlement  
20 terms after reviewing them and consulting with Class counsel.

21  
22 34. A \$10,000 incentive award to Plaintiff is reasonable under the circumstances,  
23 and well in line with awards approved by federal courts in Washington and elsewhere. In our  
24 class action cases, including TCPA, WADAD and WCPA cases, named plaintiffs have  
25 received from a few thousand to \$20,000 or more in service awards depending on whether they  
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1 were the sole named plaintiff and the extent to which they aided counsel's efforts. In light of  
2 Plaintiff's effort and risk undertaken to obtain a meaningful result for the Class we believe that  
3 the Court approve the payment of \$10,000 to the Plaintiff.  
4

5 We declare under penalty of perjury of the laws of the State of Washington that the  
6 foregoing statements are true and correct.

7 Dated: July 10, 2012 on Bainbridge Island, Washington.

8 WILLIAMSON & WILLIAMS

9 /s/Rob Williamson

10 /s/Kim Williams

11 Rob Williamson, WSBA #11387

12 Kim Williams, WSBA #9077

13 17253 Agate Street NE

14 Bainbridge Island, WA 98110

15 Telephone: (206) 780-4447 Fax: (206) 780-5557

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17 [kim@williamslaw.com](mailto:kim@williamslaw.com)

18 *Attorneys for Plaintiff*

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CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record who receive CM/ECF notification, and that the remaining parties shall be served in accordance with the Federal Rules of Civil Procedure.

Dated this 10<sup>th</sup> day of July, 2012.

By s/Rob Williamson  
Kim Williams, WSBA #9077  
Rob Williamson, WSBA #11387  
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# **EXHIBIT A**

Slip Transaction Dat		8/1/2005 - 7/10/2012	
Slip Classification	Open	Slip ID	Dates and Time
Slip Selection	Include: Lithia Motors	Posting Status	Posting Status
		Description	Description

Rate Info - identifies rate source and level		Selection Criteria	
Slip ID	Dates and Time	Timekeeper Activity Client Reference	Units DNB Est. Time Variance

18788	4/13/2011	Rob	1.00
	WIP	E-mail	0.00
		Lithia Motors	0.00
	Email exchange with KM re text message and circumstances around it; Telephone call with KM; conf with KW re potential case		
15589	4/18/2011	Rob	4.00
	WIP	Meeting	0.00
		Lithia Motors	0.00
	Meeting with client, research; travel to and from meeting; conf with KW re case		
15590	4/19/2011	Rob	1.50
	WIP	Preparation	0.00
		Lithia Motors	0.00
	Preparation complaint		
15605	4/20/2011	Rob	1.00
	WIP	Preparation	0.00
		Lithia Motors	0.00
	Preparation of complaint; emails to and from KW re same		
15613	4/21/2011	Rob	1.00
	WIP	Review	0.00
		Lithia Motors	0.00
	Review complaint; email client; revise		
15644	4/26/2011	Rob	0.30
	WIP	Review	0.00
		Lithia Motors	0.00
	Review file		
15686	5/2/2011	Rob	1.00
	WIP	Review	0.00
		Lithia Motors	0.00
	Review websites; conf with KW re same; rev emails to and from client		

15687	5/2/2011	Rob	0.30
	WIP	E-mail	0.00
		Lithia Motors	0.00
	Client		
18789	5/5/2011	Rob	0.50
	WIP	Conference	0.00
		Lithia Motors	0.00
	Conf with KW re settlement data		
18790	5/6/2011	Rob	1.25
	WIP	Conference	0.00
		Lithia Motors	0.00
	Conf with KW re letter to GD re settlement negotiations data; emails to and from KW re same		
15726	5/7/2011	Rob	0.20
	WIP	Review	0.00
		Lithia Motors	0.00
	Review letter to Grant		
15735	5/9/2011	Rob	0.20
	WIP	E-mail	0.00
		Lithia Motors	0.00
	re letter		
15764	5/12/2011	Rob	0.50
	WIP	Review	0.00
		Lithia Motors	0.00
	Review notice of appearance; Conf with KW re same		
15807	5/23/2011	Rob	0.50
	WIP	Review	0.00
		Lithia Motors	0.00
	Review removal papers; conf with KW re same		
15819	5/25/2011	Rob	5.00
	WIP	Conference	0.00
		Lithia Motors	0.00
	with GD; travel to and from; emails to and from KW and staff; confs with KW re meeting		
15831	5/26/2011	Rob	2.25
	WIP	Legal Research	0.00
		Lithia Motors	0.00
	Legal Research		



Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Est. Time Variance
15856	5/31/2011 WIP Review court filing	Rob Review Lithia Motors	0.20 0.00 0.00 0.00
15865	6/2/2011 WIP Review settlement demand and revise; conf with KW re same	Rob Review Lithia Motors	2.00 0.00 0.00 0.00
15909	6/8/2011 WIP with GD regarding demand and mediation; conf with KW re conf with OC	Rob Conference Lithia Motors	1.00 0.00 0.00 0.00
15918	6/14/2011 WIP re: scheduling mediation	Rob E-mail Lithia Motors	0.20 0.00 0.00 0.00
15957	6/17/2011 WIP regarding mediation and deadlines with KW	Rob Conference Lithia Motors	0.50 0.00 0.00 0.00
15991	6/27/2011 WIP Preparation for mediation	Rob Preparation Lithia Motors	1.25 0.00 0.00 0.00
15995	6/28/2011 WIP Review mediation submission	Rob Review Lithia Motors	1.00 0.00 0.00 0.00
16012	6/29/2011 WIP Preparation for mediation	Rob Preparation Lithia Motors	1.00 0.00 0.00 0.00
16017	6/30/2011 WIP Preparation for mediation	Rob Preparation Lithia Motors	0.30 0.00 0.00 0.00
16024	7/1/2011 WIP Preparation for mediation	Rob Preparation Lithia Motors	0.40 0.00 0.00 0.00

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Est. Time Variance
16031	7/2/2011 WIP Preparation for mediation	Rob Preparation Lithia Motors	1.00 0.00 0.00 0.00
16032	7/4/2011 WIP Preparation for mediation	Rob Preparation Lithia Motors	1.00 0.00 0.00 0.00
16027	7/5/2011 WIP Mediation; travel to and from; post mediation conference with KW	Rob Attend Mediation Lithia Motors	14.00 0.00 0.00 0.00
16038	7/6/2011 WIP with counsel in Chicago; email to opposing counsel and mediator; conference with co-counsel; review complaint in Oregon	Rob Conference Lithia Motors	1.50 0.00 0.00 0.00
16045	7/7/2011 WIP Opposing counsel and mediator re Oregon case	Rob E-mail Lithia Motors	0.30 0.00 0.00 0.00
16049	7/7/2011 WIP [No description]	Rob ECF Lithia Motors	0.20 0.00 0.00 0.00
16075	7/8/2011 WIP with co-counsel and mediator, review email from Chicago counsel	Rob Conference Lithia Motors	1.00 0.00 0.00 0.00
16067	7/11/2011 WIP with co-counsel; email opposing counsel; review email from Chicago counsel	Rob Conference Lithia Motors	1.00 0.00 0.00 0.00
16079	7/12/2011 WIP Opposing counsel regarding deadlines	Rob E-mail Lithia Motors	0.20 0.00 0.00 0.00

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Est Time Variance
16094	7/12/2011 WIP from opposing counsel and to co-counsel regarding conference	Rob E-mail Lithia Motors	0.20 0.00 0.00 0.00
16087	7/12/2011 WIP from co-counsel regarding deadlines	Rob E-mail Lithia Motors	0.20 0.00 0.00 0.00
16088	7/12/2011 WIP Chicago counsel regarding numbers of opt-outs texted again	Rob E-mail Lithia Motors	0.20 0.00 0.00 0.00
16093	7/12/2011 WIP Chicago counsel regarding his conversations with Lithia counsel	Rob E-mail Lithia Motors	0.20 0.00 0.00 0.00
16107	7/13/2011 WIP with Grant Degginger and Erin Wilson regarding Oregon case, case scheule, etc.; conf with KW re same	Rob Conference Lithia Motors	1.00 0.00 0.00 0.00
16131	7/14/2011 WIP opposing counsel proposed stipulation; review answer	Rob E-mail Lithia Motors	0.40 0.00 0.00 0.00
16163	7/20/2011 WIP [No description]	Rob Negotiations Lithia Motors	1.00 0.00 0.00 0.00
16169	7/21/2011 WIP [No description]	Rob Negotiations Lithia Motors	0.40 0.00 0.00 0.00
16176	7/21/2011 WIP Preparation response to show cause	Rob Preparation Lithia Motors	0.30 0.00 0.00 0.00

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Est Time Variance
16182	7/22/2011 WIP [No description]	Rob Negotiations Lithia Motors	1.50 0.00 0.00 0.00
16189	7/24/2011 WIP [No description]	Rob Negotiations Lithia Motors	0.30 0.00 0.00 0.00
16195	7/25/2011 WIP Conf's with KW re negotiations; emails to and from mediator	Rob Negotiations Lithia Motors	1.75 0.00 0.00 0.00
16208	7/26/2011 WIP [No description]	Rob Negotiations Lithia Motors	0.30 0.00 0.00 0.00
16211	7/27/2011 WIP Review intervention motion; conference with mediator	Rob Review Lithia Motors	2.00 0.00 0.00 0.00
16220	7/27/2011 WIP Preparation motion for preliminary approval/order	Rob Preparation Lithia Motors	2.00 0.00 0.00 0.00
16225	7/28/2011 WIP Preparation pleadings related to pao	Rob Preparation Lithia Motors	1.00 0.00 0.00 0.00
16227	7/28/2011 WIP Preparation opposition to intervention	Rob Preparation Lithia Motors	1.00 0.00 0.00 0.00
16228	7/29/2011 WIP Preparation opposition to intervention and exhibits to settlement agreement; conf with KW re her review of settlement documents; emails to and from KW re same	Rob Preparation Lithia Motors	3.50 0.00 0.00 0.00

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance
16237	7/31/2011 WIP opposing counsel	Rob E-mail Lithia Motors	0.20 0.00 0.00 0.00
16249	8/1/2011 WIP Review pleadings	Rob Review Lithia Motors	1.00 0.00 0.00 0.00
16243	8/1/2011 WIP with opposing counsel	Rob Conference Lithia Motors	1.00 0.00 0.00 0.00
16262	8/2/2011 WIP Preparation opposition to motion to intervene	Rob Preparation Lithia Motors	2.00 0.00 0.00 0.00
16268	8/3/2011 WIP Preparation Motion for Preliminary Approval	Rob Preparation Lithia Motors	1.00 0.00 0.00 0.00
16269	8/3/2011 WIP Preparation opposition to motion to intervene	Rob Preparation Lithia Motors	0.30 0.00 0.00 0.00
16270	8/4/2011 WIP Chicago counsel; review pleadings; conference with mediator; conference with opposing counsel; preparation of opposition to intervention motion	Rob Conference Lithia Motors	4.00 0.00 0.00 0.00
16294	8/6/2011 WIP Preparation papers re preliminary approval of settlement	Rob Preparation Lithia Motors	2.00 0.00 0.00 0.00
16296	8/7/2011 WIP Preparation opposition to Motion to Intervene	Rob Preparation Lithia Motors	2.00 0.00 0.00 0.00

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance
16297	8/7/2011 WIP Review pleadings for pao	Rob Review Lithia Motors	1.00 0.00 0.00 0.00
16278	8/8/2011 WIP Preparation Motion for Preliminary Approval and exhibits; revise settlement agreement	Rob Preparation Lithia Motors	3.00 0.00 0.00 0.00
16298	8/8/2011 WIP Preparation opposition to intervention motion; review Lithia's opposition	Rob Preparation Lithia Motors	4.00 0.00 0.00 0.00
16352	8/12/2011 WIP Review reply of McClaren; email mediator; email opposing counsel; conf with KW re Lithia's response	Rob Review Lithia Motors	3.00 0.00 0.00 0.00
16358	8/15/2011 WIP with opposing counsel; mediator; preparation Notice of Intent to File Surreply; conf with KW re same	Rob Conference Lithia Motors	1.50 0.00 0.00 0.00
16368	8/16/2011 WIP Preparation of surreply	Rob Preparation Lithia Motors	1.00 0.00 0.00 0.00
16376	8/18/2011 WIP Preparation of surreply; conf with KW	Rob Preparation Lithia Motors	1.50 0.00 0.00 0.00
16916	10/18/2011 WIP Review pleadings in Oregon case	Rob Review Lithia Motors	1.00 0.00 0.00 0.00
16931	10/19/2011 WIP Review Order Denying Intervention and ReNoting Motion for Preliminary Approval; conf with KW re same	Rob Review Lithia Motors	1.00 0.00 0.00 0.00

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance
16926	10/19/2011 WIP opposing counsel	Rob E-mail Lithia Motors	0.20 0.00 0.00
16937	10/20/2011 WIP with opposing counsel	Rob Conference Lithia Motors	0.50 0.00 0.00
18791	10/21/2011 WIP Conf with KW re emails to and from GCG	Rob Conference Lithia Motors	0.50 0.00 0.00
16953	10/22/2011 WIP Legal Research regarding settlements	Rob Legal Research Lithia Motors	2.00 0.00 0.00
17064	10/28/2011 WIP Grant regarding conference	Rob E-mail Lithia Motors	0.20 0.00 0.00
17069	10/31/2011 WIP Preparation joint report to the Court; conf with KW re same	Rob Preparation Lithia Motors	2.50 0.00 0.00
17071	10/31/2011 WIP Client	Rob E-mail Lithia Motors	0.20 0.00 0.00
17078	11/1/2011 WIP Preparation joint report; conf with KW re same	Rob Preparation Lithia Motors	1.50 0.00 0.00
17082	11/2/2011 WIP Review Joint Statement to the Court	Rob Review Lithia Motors	0.50 0.00 0.00
17557	1/13/2012 WIP to client regarding status.	Rob E-mail Lithia Motors	0.20 0.00 0.00

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance
17708	2/1/2012 WIP Review revisions to settlement agreement	Rob Review Lithia Motors	1.00 0.00 0.00
17715	2/2/2012 WIP Review amendments to Settlement Agreement; conf with KW re same	Rob Review Lithia Motors	2.50 0.00 0.00
17724	2/3/2012 WIP with Erin Wilson regarding revisions	Rob Conference Lithia Motors	0.30 0.00 0.00
17721	2/3/2012 WIP Settlement Exhibits	Rob Revise Lithia Motors	1.50 0.00 0.00
17749	2/6/2012 WIP Client	Rob E-mail Lithia Motors	0.20 0.00 0.00
17770	2/7/2012 WIP Review settlement documents	Rob Review Lithia Motors	0.40 0.00 0.00
17782	2/13/2012 WIP Review settlement agreement, joint submission to Court	Rob Review Lithia Motors	0.50 0.00 0.00
17782	2/14/2012 WIP Review submission to the court	Rob Review Lithia Motors	0.50 0.00 0.00
17831	2/15/2012 WIP Preparation joint motion for preliminary approval; conf with KW re final approval related issues	Rob Preparation Lithia Motors	2.00 0.00 0.00

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance
17815	TIME	Rob	1.00
17816	2/16/2012 WIP Motion for Preliminary Approval	Finalize Lithia Motors	0.00
17914	3/4/2012 WIP Opposing Counsel	Rob E-mail Lithia Motors	0.20
17928	3/5/2012 WIP regarding objection of Texas AG; amendment to settlement agreement	Rob Conference Lithia Motors	0.60
17974	3/12/2012 WIP regarding amendment of SA	Rob E-mail Lithia Motors	0.30
17982	3/13/2012 WIP with clerk	Rob Conference Lithia Motors	0.30
18015	3/19/2012 WIP Review supplemental memorandum regarding CAFA and amendment to SA	Rob Review Lithia Motors	0.00
18792	4/26/2012 WIP Conf with KW re case status, docketing and court's prior ruling	Rob Conference Lithia Motors	1.00
18358	4/30/2012 WIP Review objections from Texas AG	Rob Review Lithia Motors	0.40
18374	5/1/2012 WIP Client regarding new settlement agreement	Rob E-mail Lithia Motors	0.20
18381	5/2/2012 WIP Settlement Agreement	Rob Review Lithia Motors	0.00
18393	5/3/2012 WIP Review revised settlement agreement	Rob Review Lithia Motors	0.30
18539	5/25/2012 WIP with Court regarding status	Rob Tele. Conf. w/ Lithia Motors	0.20
18618	6/5/2012 WIP client	Rob E-mail Lithia Motors	0.20
18658	6/11/2012 WIP Review preliminary approval order; conference with opposing counsel; conference with court	Rob Review Lithia Motors	2.00
18665	6/12/2012 WIP Client regarding URL	Rob E-mail Lithia Motors	0.20
18679	6/12/2012 WIP regarding URL; numerous emails to and from KW re the URL; conf re same	Rob E-mail Lithia Motors	1.50
18690	6/14/2012 WIP regarding claim form and notice	Rob E-mail Lithia Motors	0.30
18704	6/18/2012 WIP Review changes to forms, conference with opposing counsel; Telephone call to client concerning with client; conf with KW	Rob Review Lithia Motors	2.00
18715	6/19/2012 WIP TIME	Rob Review Lithia Motors	1.00

7/10/2012  
8:59 AM

Williamson and Williams  
Slip Listing

Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est Time Variance
			Review modificatoins to notice, etc., Conference with Court		0.00
18742	6/20/2012	WIP	TIME	Rob Review Lithia Motors	0.50 0.00 0.00
			Review notice and claims forms		0.00
18727	6/22/2012	WIP	TIME	Rob Review Lithia Motors	1.50 0.00 0.00
			Review orders from court; conference with claims administrator and opposing counsel		0.00
18756	6/25/2012	WIP	TIME	Rob Class Administration Lithia Motors	0.40 0.00 0.00
			[No description]		0.00
18771	6/29/2012	WIP	TIME	Rob Review Lithia Motors	1.00 0.00 0.00
			Review notice documents		0.00
18769	6/29/2012	WIP	TIME	Rob Review Lithia Motors	0.30 0.00 0.00
			Review Classmates decision		0.00
18806	7/9/2012	WIP	TIME	Rob Preparation Lithia Motors	4.00 0.00 0.00
			Preparation of fee petition		0.00
Grand Total					
					133.60
					0.00
					133.60

Selection Criteria

Slip Classification Open  
Cite-Selection Include: LithiaMotors

Rate Info - identifies rate source and level!

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance
2128	8/15/2010 WIP Review and revise Notice of intent to file surreply; conf with RW re same	Kim Review LithiaMotors	1.00 0.00 0.00 0.00
2116	4/13/2011 WIP Conference with RW re potential case; rev email from KM to RW re same	Kim Conference LithiaMotors	0.50 0.00 0.00 0.00
1232	4/18/2011 WIP Conference with client; travel to and from; conf with RJW re case; review complaint in text case pending in WDW	Kim Conference LithiaMotors	4.00 0.00 0.00 0.00
2117	4/19/2011 WIP Review VH research on Lithia Motors	Kim Review LithiaMotors	1.00 0.00 0.00 0.00
1244	4/20/2011 WIP Draft- revise complaint; conf with RJW re same; research re text claims, state and federal	Kim Draft LithiaMotors	1.50 0.00 0.00 0.00
1233	4/20/2011 WIP Preparation of pleadings- redlined version of Complaint; emails to RJW and LH re finalizing same	Kim Prep Pleadings LithiaMotors	1.50 0.00 0.00 0.00
2118	4/25/2011 WIP Research- internet research on complaints re Lithia text messages and attempts to opt out	Kim Research LithiaMotors	1.50 0.00 0.00 0.00

Timekeeper Activity Client Reference

Slip ID Dates and Time Posting Status Description

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance
1271	5/2/2011 WIP Conferences with RJW re internet sites with Lithia references; internet research re same; rev emails to and from client re case	Kim Conference LithiaMotors	1.00 0.00 0.00 0.00
1284	5/5/2011 WIP Conference with RJW re settlement data	Kim Conference LithiaMotors	0.50 0.00 0.00 0.00
1286	5/6/2011 WIP Draft; letter to GD re what we need to embark on settlement negotiations; conf with RJW re same; email to RJW re same; internet research re same; file review	Kim Draft LithiaMotors	3.00 0.00 0.00 0.00
1292	5/9/2011 WIP emails to and from VH re letter to GD; conf with RJW re conf with GD and potential settlement	Kim EMail LithiaMotors	0.50 0.00 0.00 0.00
2119	5/12/2011 WIP Review Notice of Appearance; conf with RW re same	Kim Review LithiaMotors	0.50 0.00 0.00 0.00
2120	5/23/2011 WIP Review removal papers; conf with RW re same	Kim Review LithiaMotors	0.50 0.00 0.00 0.00
1320	5/25/2011 WIP Conference with GD re possible settlement; conf with RJW re same; legal research; internet research; email to client; emails to and from RJW and staff; travel to and from meeting; confs with RW re meeting	Kim Conference LithiaMotors	5.00 0.00 0.00 0.00
1323	5/26/2011 WIP Review file to prepare summary for settlement demand; confs with RJW re notice issues; legal research re text messaging solicitation; drafting	Kim Review LithiaMotors	5.00 0.00 0.00 0.00

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Est. Time Variance
2121	5/31/2011 WIP Review court filing	Kim Review LithiaMotors	0.20 0.00 0.00 0.00
1328	6/2/2011 WIP Draft settlement demand; legal research re same; conf with RJW re same; edits; conf with and emails to staff re same; email to client re same	Kim Draft LithiaMotors	4.00 0.00 0.00 0.00
1338	6/8/2011 WIP Conference with RJW re mediation and conf with GD	Kim Conference LithiaMotors	1.00 0.00 0.00 0.00
1368	6/27/2011 WIP Draft Mediation submission; conf with RJW re same; legal research re same; review Coughenour Order and analyze; instructions to staff	Kim Draft LithiaMotors	5.00 0.00 0.00 0.00
2123	6/30/2011 WIP Mediation Prep	Kim Preparation LithiaMotors	1.50 0.00 0.00 0.00
2124	7/3/2011 WIP Mediation Prep	Kim Preparation LithiaMotors	1.25 0.00 0.00 0.00
1376	7/5/2011 WIP Mediation, travel to and from, mediation Preparation and assembly of, post mediation conf with RJW	Kim Mediation LithiaMotors	14.00 0.00 0.00 0.00
2122	7/6/2011 WIP Conference with RW re mediation and deadlines	Kim Conference LithiaMotors	0.50 0.00 0.00 0.00
1381	7/6/2011 WIP	Kim Conference LithiaMotors	1.50 0.00 0.00 0.00

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Est. Time Variance
2125	7/8/2011 WIP Conference with RW and mediator; rev email from Chicago counsel; conf with RW	Kim Conference LithiaMotors	1.00 0.00 0.00 0.00
1386	7/11/2011 WIP Rev client email; respond re status of mediation process and Oregon lawsuit	Kim Email LithiaMotors	0.25 0.00 0.00 0.00
1390	7/11/2011 WIP Conference with RJW re Chicago firm's role; rev emails to and from Chicago firm lawyers	Kim Conference LithiaMotors	1.00 0.00 0.00 0.00
2126	7/12/2011 WIP Email to RW re deadlines; review deadlines and emails to and from Chicago counsel	Kim Email LithiaMotors	1.00 0.00 0.00 0.00
1398	7/13/2011 WIP Telephone call with OC re mediation status, Oregon lawsuit, communications counsel in that lawsuit, how to proceed with our negotiations, and obtaining info re opt out class; conf with RW re same	Kim Telephone call LithiaMotors	1.00 0.00 0.00 0.00
1416	7/21/2011 WIP Conference with RJW re status of settlement negotiations and our position re counter offer; drafting settlement last and final; review emails to and from mediator and RJW re last and final; review emails re stip to file with court re case status and the stip	Kim Conference LithiaMotors	3.00 0.00 0.00 0.00
2127	7/22/2011 WIP Settlement negotiations	Kim Negotiations LithiaMotors	1.00 0.00 0.00 0.00



7/10/2012  
7:51 AM

Slip ID	Dates and Time	Timekeeper	Units
Posting Status	Description	Activity	DNB Time
Description	TIME	Client	Est. Time
		Reference	Variance
2129	8/18/2011	Kim	1.00
WIP	Review and revise surrey; conf with RW	Review	0.00
		LithiaMotors	0.00
2130	10/19/2011	Kim	2.00
WIP	Review Oregon pleadings; review Order Denying Intervention; conf with RW	Review	0.00
		LithiaMotors	0.00
2131	10/20/2011	Kim	0.50
WIP	Conference with opposing counsel	Conference	0.00
		LithiaMotors	0.00
2132	10/21/2011	Kim	2.00
WIP	Emails to and from GCG; conf with RW re same; rev settlement agreements in other cases	EIMail	0.00
		LithiaMotors	0.00
1705	10/31/2011	Kim	1.50
WIP	Conference with RW re case; review and revise submission for Judge Jones	Conference	0.00
		LithiaMotors	0.00
1712	11/1/2011	Kim	1.00
WIP	Review Judge Jones submission; conf with RW re same	Review	0.00
		LithiaMotors	0.00
2133	2/2/2012	Kim	1.00
WIP	Review revised SA; conf with RW	Review	0.00
		LithiaMotors	0.00
2134	2/7/2012	Kim	1.00
WIP	Review settlement documents re revisions	Review	0.00
		LithiaMotors	0.00
2135	2/14/2012	Kim	0.75
WIP	Review court submission	Review	0.00
		LithiaMotors	0.00
1840	2/15/2012	Kim	1.00
WIP		Conference	0.00
		LithiaMotors	0.00

7/10/2012  
7:51 AM

Slip ID	Dates and Time	Timekeeper	Units
Posting Status	Description	Activity	DNB Time
Description	TIME	Client	Est. Time
		Reference	Variance
1418	7/25/2011	Kim	2.00
WIP	Conferences with RJW re settlement negotiations; review email to mediator, emails to and from mediator	Conference	0.00
		LithiaMotors	0.00
1421	7/29/2011	Kim	2.50
WIP	Draft- review and revise all proposed settlement documents; conf with RJW re same; emails to and from RJW re same	Draft	0.00
		LithiaMotors	2.00
1431	8/1/2011	Kim	0.50
WIP	Conference with OC re settlement related issues	Conference	0.00
		LithiaMotors	0.00
1437	8/4/2011	Kim	3.00
WIP	Legal Research re settlements in text cases by Chicago firm; conf with RW re same	Legal Research	0.00
		LithiaMotors	0.00
1432	8/4/2011	Kim	1.00
WIP	Conference with RJW re conf with Chicago firm; review motion for preliminary approval and other pleadings to be filed re settlement	Conference	0.00
		LithiaMotors	0.00
1442	8/8/2011	Kim	4.00
WIP	Draft Opposition to Motion to Intervene; Draft RW Declaration- review and revise both; Conf with RJW re same; review Lithia opposition to same motion; email instructions to staff re same	Draft	0.00
		LithiaMotors	0.00
1447	8/9/2011	Kim	0.50
WIP	Review Lithia's response to McClaren's Motion to Intervene, and declarations/order	Review	0.00
		LithiaMotors	0.00
1527	8/12/2011	Kim	1.00
WIP	Conference with RW re Lithia's response; review Lithia's reply	Conference	0.00
		LithiaMotors	0.00

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance
2137	2/17/2012 WIP Review and revise draft Motion for Preliminary Approval	Kim Review LithiaMotors	1.00 0.00 0.00 0.00
2138	3/5/2012 WIP Conference with RW re Objection of Texas AG and how to respond	Kim Conference LithiaMotors	0.50 0.00 0.00 0.00
2139	3/19/2012 WIP Review supp memo re CAFA and amended Settlement Agreement	Kim Review LithiaMotors	0.50 0.00 0.00 0.00
2004	4/26/2012 WIP Conference with RW re case status; docketing; court's prior ruling	Kim Conference LithiaMotors	0.25 0.00 0.00 0.00
2140	4/30/2012 WIP Review objections TX AG	Kim Review LithiaMotors	0.25 0.00 0.00 0.00
2141	5/3/2012 WIP Review/revise Settlement Agreement	Kim Review LithiaMotors	1.00 0.00 0.00 0.00
2088	6/11/2012 WIP Conference with RW; review court's order; docketing/calendaring for approval time lines; emails to staff re time records	Kim Conference LithiaMotors	1.50 0.00 0.00 0.00
2092	6/12/2012 WIP Numerous emails to and from RW re naming of settlement website; conf with RW re same; review emails with client re same issue	Kim E/Mail LithiaMotors	1.00 0.00 0.00 0.00

Grand Total

Billable 107.70  
Unbillable 0.00  
Total 107.70

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance
2102	6/18/2012 WIP Telephone call with client; conf with RW; emails to and from co counsel and OC- review	Kim Telephone call LithiaMotors	1.00 0.00 0.00 0.00
2136	7/6/2012 WIP Review of time records/work on fee petition; conf with RW re division of responsibilities	Kim Preparation LithiaMotors	4.00 0.00 0.00 0.00
2142	7/7/2012 WIP Review RW time records and staff time records to prepare fee petition; conf with RW re Preparation of fee petition	Kim Review LithiaMotors	1.25 0.00 0.00 0.00
2146	7/8/2012 WIP Conference with RJW re fee petition; work on fee petition	Kim Conference LithiaMotors	1.00 0.00 0.00 0.00
2150	7/9/2012 WIP Conference with RW re fee petition; text messages with RW re fee petition and common fund analysis	Kim Conference LithiaMotors	0.50 0.00 0.00 0.00
2151	7/9/2012 WIP Conference with RW re fee petition, declarations, getting a final draft	Kim Conference LithiaMotors	0.50 0.00 0.00 0.00
2152	7/10/2012 WIP Conference with RW re fee petition draft; confs with staff re finalizing same; review and revise same; review cases cited	Kim Conference LithiaMotors	3.00 0.00 0.00 0.00

Grand Total

Billable 107.70  
Unbillable 0.00  
Total 107.70

Selection Criteria

Slip Transaction Dat 8/1/2008 - 6/28/2012  
Slip Classification Open  
Cfile Selection Include: Lithia Motors

Rate Info - identifies rate source and level

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance
2529	4/5/2011 WIP hard copy filing	Vicky Case Work Lithia Motors	2.00 0.00 0.00
1925	4/15/2011 WIP [No description]	Vicky New Case Docketing et Lithia Motors	1.00 0.00 0.00
1927	4/19/2011 WIP printing out website sale pages	Vicky Case Work Lithia Motors	0.50 0.00 0.00
1959	4/28/2011 WIP corr, s&c to client, new case setup and new case docketing	Vicky Case Work Lithia Motors	1.00 0.00 0.00
1993	5/9/2011 WIP Letter to client	Vicky Correspondence Lithia Motors	0.75 0.00 0.00
2019	5/12/2011 WIP [No description]	Vicky Case Work Lithia Motors	0.50 0.00 0.00
2057	6/2/2011 WIP finalize demand letter	Vicky Case Work Lithia Motors	0.75 0.00 0.00
2164	7/5/2011 WIP FCC info for Kim	Vicky Case Work Lithia Motors	1.50 0.00 0.00

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance
2179	7/7/2011 WIP [No description]	Vicky Case Work Lithia Motors	0.25 0.00 0.00
2426	11/11/2011 WIP [No description]	Vicky Copying and Saving to Lithia Motors	0.25 0.00 0.00
2524	5/3/2012 WIP [No description]	Vicky Case Work Lithia Motors	0.50 0.00 0.00
2525	5/14/2012 WIP [No description]	Vicky Case Work Lithia Motors	0.25 0.00 0.00
2527	6/28/2012 WIP [No description]	Vicky Timeslips Lithia Motors	0.25 0.00 0.00
2528	6/28/2012 WIP preparing exhibits	Vicky Case Work Lithia Motors	2.00 0.00 0.00
Grand Total			11.50 0.00 11.50

**TimeSlips Lithia - Lisa**

<b>Date</b>	<b>Activity</b>	<b>Time</b>
4/21/2011	Edit, Format, File and Serve Complaint and Summons	3
5/24/2011	Save removal document to file	0.25
6/17/2011	Docketing	0.25
6/27/2011	Locate Judge Coughenour Order	0.25
6/27/2011	Email to Michele at JAMS	0.25
7/22/2011	Docketing	0.25
7/25/2011	Save email to file	0.25
7/27/2011	Docketing	0.25
7/28/2011	Mediation Submission	2
8/8/2011	Prepare Proposed Order	0.5
8/8/2011	Edit/Finalize/File/Serve Motion Prel Approval	4
8/15/2011	Prepare and File Notice of Intent to file Surreply	1
8/17/2011	Locate Group of Settlements printed out reached by Chicago Counsel	0.5
10/19/2011	Save/print documents/docketing	0.5
10/27/2011	Docketing	0.25
11/2/2011	Send Copy of JSR to Client	0.25
2/15/2011	Send signed Sett Page to OC	0.5
7/10/2012	Edit, Finalize File Fee Petition	3

**TOTAL 17.25**

# **EXHIBIT B**

**Williamson & Williams**  
**Client Costs Advanced**  
 All Transactions

Date	Num	Source Name	Memo	Amount
<b>Lithia Motors - 11033</b>				
04/29/2011	9050546	ABC-Legal Messengers Inc.	Process Service	170.00
05/01/2011	822758508	West Group Payment Center	Westlaw Internet Access Charges - Apr	75.00
05/11/2011		Bank of America	e-Filing Fee	232.49
06/01/2011	822940921	West Group Payment Center	Westlaw Internet Access Charges - May	200.00
06/30/2011	823113727	West Group Payment Center	Westlaw Internet Access Charges - Jun	50.00
07/11/2011		Bank of America	JAMS Mediation Fee	2,110.00
07/11/2011		Bank of America	Parking	27.00
08/01/2011	823285641	West Group Payment Center	Westlaw Internet Access Charges - Jul	300.00
08/20/2011	39	Carla Tachau Lawrence	Legal Research	1,041.25
09/01/2011	823475106	West Group Payment Center	Westlaw Internet Access Charges - Aug	180.00
12/31/2011		Williamson & Williams (In-House)	Postage - 2011	2.95
12/31/2011		Williamson & Williams (In-House)	In-House Photocopies - 2011	345.80
12/31/2011		Williamson, Rob	Ferry/Mileage	50.00
02/01/2012	Reimburse...	West Group Payment Center	Westlaw Internet Access Charges - Jan	25.00
03/10/2012	824405477	United Parcel Service	(1) Next Day Air Letter	20.07
06/30/2012	0000F656A...	Williamson & Williams (In-House)	In-House Photocopies - 2012	34.00
Total Lithia Motors - 11033				<u>4,863.56</u>
<b>TOTAL</b>				<u><u>4,863.56</u></u>