

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION

TOMMY LINDSEY, et al.,)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION NUMBER
)	5:15-cv-01750-AKK
3M COMPANY, et al.,)	
)	
Defendants.)	

**CLASS REPRESENTATIVES' MOTION
FOR AWARD OF ATTORNEY FEES AND COSTS**

Pursuant to Fed.R.Civ.P. 23, Class Representatives Tommy Lindsey, Lanette Lindsey, Larry Watkins, and Venetia Watkins, by and through Class Counsel, seek an attorney fee award equal to thirty percent of the common fund created by the Settlement, plus reimbursement of the litigation expenses (\$845,353) incurred by Class Counsel. The request of thirty percent, or \$3,600,000, for attorney fees is well within the range of reasonableness of guiding Eleventh Circuit precedent, which will be addressed in detail below.

Therefore, Class Counsel hereby move for an order awarding attorney fees and expenses in the amounts of \$3,600,000 (three million, six hundred thousand dollars) and \$845,353 (eight hundred, forty-five thousand and three hundred and fifty-three dollars), respectively.

Introduction and Summary

The Settlement preliminarily approved on November 10, 2021 (Doc. 261) resolved six years of litigation in this case. The Settlement creates a common fund for Class members of \$12,000,000.00 (twelve million dollars). The full net common fund will be paid to the Class. There is no reversion. Additionally, settling Defendant 3M Company (“3M”)¹ will pay for half of the reasonable costs to (1) notify the Class members of the Settlement and (2) administer the Settlement.

The common fund will provide up to \$745 (seven hundred and forty-five dollars) to each water ratepayer in the Class. The ratepayers are residential customers of five water utilities. Between \$50 and \$100 (fifty and one-hundred dollars) will be paid to each household resident and/or owner in the Class.² The Settlement preserves the rights of each Class member to assert claims against the Defendants for manifest bodily injuries or illnesses and any mental anguish resulting from such manifest injuries or illnesses, as well as for property damage claims arising out of or related to the application of PFAS-containing biosolids on property owned by a Class member.

¹ The settling Defendants are 3M, Dyneon, LLC, and Daikin America, Inc. (“DAI”).

² A thorough explanation of these payments and eligibility for them appears in the Motion for Preliminary Approval of Class Action Settlement, filed October 26, 2021. Doc. 258.

These benefits are substantial. The payments will compensate Class members who either paid for potable water contaminated with PFAS during the Class Period or who owned or resided for at least six months at a home which received potable water contaminated with PFAS during the Class Period.

The total sum of payments to ratepayers is \$6.415 million, which is 43 percent of the total sum of payments by class members for potable water in the Class Period. This is very fair compensation. Residential water customers ingest on average nineteen percent of the water distributed to them by water utilities. *See* <https://www.epa.gov/watersense/data-and-information-used-watersense> (accessed July 28, 2021). Another twenty percent is used for bathing, *see id.*, which means the total sum of settlement payments to ratepayers is more than 100 percent of their payments to the utilities for water for drinking, cooking, and bathing.

Residents and owners are fairly compensated, too. Payments to them will be for (1) the nuisance and offensiveness of PFAS in the potable water where they lived or at the household properties they owned, and (2) any diminution of property value to the extent a class member possessed an ownership interest in the household property. Although the range of individual compensation is small (\$50 and \$100 dollars), the evidence and exclusions in the Settlement (manifest personal injury and property damage from biosolids) warrant it.

The attorney fee sought is thirty percent of the common fund, within the

range allowed by precedent. *See Camden I Condo. Ass'n v. Dunkle*, 946 F.2d 768, 774 (11th Cir. 1991) ("The majority of common fund fee awards fall between 20% to 30% of the fund."). The factors for awarding it clearly are present, namely (1) the amount of attorney time involved and the results obtained, (2) the novelty and difficulty of the issues, (3) the skill required to litigate the issues, (4) the fact that the fee is contingent and customary, (5) fees awarded to Class Counsel in similar cases, (6) the preclusion of other employment by Class Counsel due to the extensive time burdens of the case, (7) time limitations imposed by the circumstances, (8) the experience, reputation, and ability of the attorneys, (9) undesirability of the case, and (10) the nature and length of the professional relationship with the Representative Plaintiffs. The above are commonly referred to as the *Johnson* factors.

A thirty-percent fee also is warranted by three additional considerations set by precedent: the length of the negotiation, non-monetary benefits to the Class, and economies of scale. The reasonableness of the fee is confirmed by a lodestar cross check. Although this cross check is not required,³ Class Counsel provides it as an additional measure of reasonableness.

³ *See e.g., Waters v. Int'l Precious Metals Corp.*, 190 F.3d 1291, 1298 (11th Cir. 1999) ("Furthermore, while we have decided in this circuit that a lodestar calculation is not proper in common fund cases, we may refer to that figure for comparison.").

Argument

In *Shiyang Huang v. Equifax Inc. (In re Equifax Customer Data Sec. Breach Litig.)*, 999 F.3d 1247, 1278 n.22 (11th Cir. 2021), the Eleventh Circuit described the factors for an award of attorney fees from a common fund. These are the *Johnson* factors, described this way:

The *Johnson* factors include 12 factors from the opinion itself:

(1) the time and labor required; (2) the novelty and difficulty of the questions involved; (3) the skill requisite to perform the legal service properly; (4) the preclusion of other employment by the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the attorneys; (10) the "undesirability" of the case; (11) the nature and the length of the professional relationship with the client; (12) awards in similar cases.

Camden I, 946 F.2d at 772 & n.3. The *Johnson* factors also include a handful of additional factors this Court added in *Camden I*: "the time required to reach a settlement, whether there are any substantial objections by class members or other parties to the settlement terms or the fees requested by counsel, any non-monetary benefits conferred upon the class by the settlement, and the economics involved in prosecuting a class action." *Id.* at 775. The Objectors challenging the District Court's decision to award attorney's fees do not directly challenge its application of the factors, so we do not undertake a complete review of the factors.

A. The Amount of Fee Sought Is Justified.

As follows below, Class Counsel re-order the factors in *Shiyang Huang* by importance and slightly condense them, and they submit that their work (and expenses) satisfy all the factors.

1. The Time Involved and Results Obtained

Class Counsel devoted 4,098 hours of attorney work to successfully litigate and conclude the case by the Settlement. *See* Declaration of Class Counsel at Exhibit 1. The time is heavily weighted with the work of Class Counsel, but includes a large number of hours of senior associates of HGD. *Id.* The work was required by the difficult character of the case.

The Plaintiffs bore burdens of proof and law on questions whether and to what extent (1) the potable water distributed by the water utilities was contaminated by PFAS, (2) each Defendant was responsible for the contamination, (3) the contamination was the same for each residential customer of the water utilities, supporting certification of a class of customers, (4) other support and reasons existed for classing the claims, and (5) the PFAS in the potable water supported an award of damages to a class.

To carry the burdens, Class Counsel devoted substantial time and financial resources to obtain, review, and assess extensive and wide-ranging records and test data produced in discovery and obtained from the experts Class Counsel retained for that purpose. The Class Period commences in 2013, two years before the lawsuit commenced, but the earliest records obtained and reviewed date from decades before 2013 given the long-lasting character of PFAS after it is discharged into the environment.

The skill and labor required to obtain the evidence and assert it effectively for the Class were enormous. More than a million records were reviewed. The water utilities involved were subpoenaed, with their distribution systems and customer data thoroughly and painstakingly examined. Experts were consulted and engaged to conduct field investigations and testing, and other experts were retained to determine and provide testimony on (1) properties of PFAS, (2) health effects of PFAS in the drinking water, (3) “fate and transport” of PFAS in water distributed by the utilities at issue, (4) standards of care for the Defendants’ facilities and operations on the Tennessee River (the source of the distributed drinking water), and (5) which ratepayer customers of the water utilities could be included in a class.

That last task (identifying ratepayers for a class) critically included ascertaining damages (an irreducible requirement for class certification), and the work required to successfully complete the task illustrates the overall complexity and burdens in the case. Class Counsel retained the needed expert (Forensic Strategic Solutions, or FSS) in November, 2019, and during the following two years culminating in the Settlement, FSS and Class Counsel undertook and completed this work *specific* to the task of ascertaining class members and damages:

- Reviewed 7,843 documents most of which were subpoenaed (and otherwise obtained) from the water utilities;

- Provided an affidavit in support of class certification;
- Provided an opinion on how to calculate damages, explaining that it would be reasonable for the water utilities to have the data necessary to do so;
- Prepared for and was examined in deposition on the process and opinions offered in case;
- Determined the data needed from the water utilities and prepared requests to the utilities;
- Visited each water utility to determine what information was available and the characteristics of customers receiving water distributed by WMEL (directly or via the other water utilities);
- Communicated with the utilities to understand data and to request follow-up productions;
- Prepared data from each utility for analysis;
- Analyzed individual data sets produced by utilities to determine if the production was responsive;
- Performed data analysis of each utility data set to ascertain damages for each potential class definition considered and forwarded by Class Counsel;
- Identified ratepayers and service addresses (households) in the class;
- Conducted multiple meetings in person and by zoom to discuss findings and to determine possible distribution models for ratepayers in the class;
- Engaged in conference calls, emails, analysis, and productions to AEA group (the counterpart expert for the defense); and
- Performed and stated payout distribution to ratepayers in the class based on total amount of water charges paid, total individual account payments, payment dates, pro rata shares, and payment minimums and caps.

The final event in the list was completed on October 25, 2021, two years after the expert was retained.

The work of Class Counsel and the experts retained on the other litigation subjects (contaminant properties, health effects, “fate and transport,” standards of care) was equally lengthy and burdensome. The chief distinction is the volume of

records that were obtained and reviewed on those primary subjects. More than a million document pages were examined, spanning decades of information, requiring Class Counsel to pay a capable vendor (Cicayda) for document hosting, predictive analysis, and review capability.

This heavy volume of attorney time and large expenditures for experts and skilled document review were well warranted, because one gap or insufficiency in proof, even a single stone unturned, posed a risk that class relief would be unattained or a claim would fail. The converse is true, too: the right use of resources could powerfully advance the case for the Class, which occurred. The briefing the parties submitted for and against class certification and summary judgment demonstrates these points. The arguments are thorough and supported by extensive records, test data over many years, the testimony of numerous experts, other witness accounts, and references to reliable third-party information. The law is skillfully debated, and the major issues are fully joined and hotly contested. *The Settlement was reached in this sharpened posture, with compromise promoted by it.* The results for the Class are excellent. For these reasons, the attorney time involved and results warrant the fee and expenses sought.

2. Novelty and Difficulty of Issues

There is no MCL (maximum contaminant level) for PFAS or other enforceable limit on the contaminant in drinking water. There are advisory limits,

and those were asserted here. The novel question was whether those limits, if and when exceeded, support claims for the Class under Alabama law. The Representative Plaintiffs, through Class Counsel, made a compelling case on the question with the proof required (the difficulties of which are described above). They did so against well-resourced opponents zealously represented by highly competent attorneys. Thus, the novelty and difficulty of the litigation support the fee and expenses sought. *Cf. Sullivan v. Saint-Gobain Performance Plastics Corp.*, 2021 U.S. Dist. LEXIS 90089, at *10 (D. Vt. May 10, 2021) ("The case spans more than 30 years of history at two industrial locations. It involves two companies. The issues of the source of environmental contamination and the appropriate remedy have both been complex. This is a large case involving complicated scientific and legal issues. . . . The case has not yet gone to jury trial. It contains some risk for plaintiffs on the issue of liability and greater risk on the issue of compensable damages.")

3. Skill Required to Litigate

The credentials of Class Counsel to successfully litigate a class action of this complexity are in the record. Docs. 202-45, 202-46. Class Counsel diligently applied those skills to advance the case for the Class and to obtain the Settlement. Given the difficult issues met and surmounted, the skills very clearly were required and were effectively employed.

4. Contingent Fee

Class Counsel at all times bore the risks that their time and financial expenditures would be lost, because they prosecuted the case on customary contingency fee agreements with the Representative Plaintiffs. *See* Exhibit 2. "[A] determination of a fair fee for Class Counsel must include consideration of the contingent nature of the fee, the outlay of out-of-pocket expenses by Class Counsel, and the fact that the risks of failure and nonpayment in a class action are extremely high." *Janicijevic v. Classica Cruise Operator, Ltd.*, 2021 U.S. Dist. LEXIS 95561, at *24 (S.D. Fla. May 19, 2021) (citing *Pinto v. Princess Cruise Lines, Ltd.*, 513 F. Supp. 2d 1334 (S.D. Fla. 2007)). Precedent from environmental litigation confirms that conclusion:

In environmental tort cases, issues of proof and causation are often difficult. Contingent-fee arrangements will encourage other attorneys to accept and prosecute cases on behalf of individuals who have sustained injuries similar to those of the plaintiffs in this case.

Collins v. Olin Corp., 2010 U.S. Dist. LEXIS 39862, at *24 (D. Conn. Apr. 21, 2010) (quoted parenthetically in *Sullivan*, 2021 U.S. Dist. LEXIS 90089 at *12-13). This factor is met, along with the factor of customary fee, supporting the fee and expenses sought.

5. Fees in Similar Cases

“Turning to the next factor, the requested fee of 30% of the settlement fund is in keeping with fee awards approved by other courts in class actions.” *Janicijevic*, 2021 U.S. Dist. LEXIS 95561, at *24 (collecting decisions). *Accord Wolff v. Cash 4 Tits.*, 2012 U.S. Dist. LEXIS 153786, at *15 (S.D. Fla. Sep. 26, 2012) (“The average percentage award in the Eleventh Circuit mirrors that of awards nationwide—roughly one-third.”). An award of thirty percent accords with precedent from environmental cases specifically and from other circuits generally. *See Sullivan*, 2021 U.S. Dist. LEXIS 90089, at *11-12 (environmental case); *Collins*, 2010 U.S. Dist. LEXIS 39862, at *22-24 (D. Conn. Apr. 21, 2010) (same); *In re Payment Card Interchange Fee & Merch. Disc. Antitrust Litig.*, 991 F. Supp. 2d 437, 445 (E.D.N.Y. 2014) (“For example, it is very common to see 33% contingency fees in cases with [common] funds of less than \$10 million, and 30% contingency fees in cases with funds between \$10 million and \$50 million.”). This factor is satisfied, accordingly.

6. Preclusion of Other Employment

Class Counsel, from their first appearance for the Representative Plaintiffs in 2018, devoted thousands of hours to prosecute the case (*see* Exhibit 1), time which could not be devoted to other engagements. This factor is met.

7. Time Constraints

The Covid pandemic affected the parties, their attorneys, and their experts. Routines were disrupted, and the procedural schedule was wisely adjusted and extended to accommodate the exigent circumstances. Yet, important events including summary judgment briefing had to be done entirely remotely due to office closures, slowing that work considerably and thereby producing time constraints. This factor is met.

8. Experience, Reputation, and Ability of Class Counsel

This factor is satisfied by the showing under No. 3 above (“Skill Required to Litigate the Issues.”).

9. Undesirability

“Attorneys must have incentive to take undesirable cases in order to assure access to the courts for all people; awarding fees based on a reasonable percentage of the recovered fund provides such an incentive.” *Millsap v. McDonnell Douglas Corp.*, 2003 U.S. Dist. LEXIS 26223, at *41 (N.D. Okla. May 28, 2003). A case is undesirable, according to *Millsap*, when attorneys are saddled with a significant risk of substantial loss (true here) and burdened by “the substantial commitment required in complex, class-action litigation on behalf of plaintiffs” (true here). *Id.* at *39-41. This factor is overwhelmingly satisfied.

10. Relationship with the Client

Class Counsel's professional relationship with the Class Representatives began in 2019 and continues today. It has entailed multiple in-person interviews in Birmingham and in and near Decatur, numerous other communications, and thorough in-person deposition preparation and representation. The relationship is characterized by diligence, reliability, and trust, satisfying this factor.

11. The Additional Considerations

Shiyang Huang, 999 F.3d 1247, 1278 n.22 (11th Cir. 2021), states that the Eleventh Circuit adds these considerations for a fee award: "the time required to reach a settlement, whether there are any substantial objections by class members or other parties to the settlement terms or the fees requested by counsel, any non-monetary benefits conferred upon the class by the settlement, and the economics involved in prosecuting a class action." The fee and expenses sought account for and are supported by the first, third, and fourth considerations. The second consideration ("any substantial objections by class members or other parties to the settlement terms or the fees requested by counsel") is unaddressed now, because it depends upon objections that may be filed after this motion and the motion for final

approval of the Settlement.⁴

The negotiation leading to the Settlement was protracted and pressured by competing interests of the parties. Proposals were made by the series, backed at each turn by argument and evidence, with the sides' respective positions revised throughout that process. The amount of time required was lengthy and was increased by a drive to agree on the most inclusive class supported by evidence. That required further investigation by all sides once the parties reached agreements in principle. The first consideration is satisfied.

The litigation produced highly consequential non-monetary benefits for the Class, satisfying the third consideration. Beginning September 29, 2016, the potable water distributed to the households the utilities serve has been rid of PFAS, first by treatment by a GAC filtration system which eliminated almost all long-chain PFAS during the time it operated, and now, since May of this year, by treatment with a reverse osmosis (RO) system. The RO system is the most advanced water filtration available. It removes all 29 different PFAS compounds tested against it and has a fifty-year lifespan.

The fourth consideration is met as well. This is not a mega fund case or one

⁴ The movants respectfully submit that they should be allowed to supplement this motion (or the final approval motion yet to be filed) to address any such objections.

in which a settlement creates \$50 million of compensation or more. In those instances, due to economies of scale, a one-third fee award can produce “a recovery disproportionate to the time spent.” *See e.g., Sullivan*, 2021 U.S. Dist. LEXIS 90089, at *11. That is not the case here. The amount of Class Counsel’s work is fully commensurate with the litigation’s difficulty and the results obtained. Nothing is disproportionate.

B. The Cross Check.

Class Counsel’s 4,098 hours of attorney work yield a lodestar of \$3,261,997. Exhibit 1 at ¶ 4.⁵ That approximates the fee sought, confirming its reasonableness. *See Cox v. Cmty. Loans of Am., Inc.*, 2016 U.S. Dist. LEXIS 195533, at *10 (M.D. Ga. Oct. 6, 2016) (“Thus, the lodestar cross-check approximates the amount being requested under the percentage of the common fund approach and is fair and reasonable.”). The lodestar employs hourly rates in the Laffey Matrix,⁶ a recognized tool for determining proper compensation for attorney hours in complex federal cases national in scope or which occur in the largest metropolitan areas. *See Bowens v. Plaza Servs., LLC*, 2021 U.S. Dist. LEXIS 114418, at *29 n.88 (N.D.

⁵ Class Counsel presently is engaged in further work for the Class, specifically work required to ensure proper notice to Class members. Those additional hours, if taken into account later, also would increase the lodestar.

⁶ <http://www.laffeymatrix.com/see.html> (accessed 12/1/2021).

Ga. Feb. 1, 2021).⁷

If the Court decides that the Laffey Matrix rates are too high for use here,⁸ a lodestar adjusted for that determination would support a thirty percent fee nonetheless. Hourly rates seventy-five percent of the Laffey rates (a very large downward adjustment) yield a lodestar of \$ 2,446,498.⁹ That sum approaches the \$3.6 million requested, which is a reasonable cross check. That conclusion is further grounded by crediting the work of prior counsel for the Plaintiffs on important tasks including, but not limited to, investigation, complaint drafting and

⁷ Courts outside of the Eleventh Circuit also use, or consider using, the Laffey Matrix. *See Awalt v. Marketti*, 2018 U.S. Dist. LEXIS 86109, at *7 n.1 (N.D. Ill. May 23, 2018) ("Nevertheless, the Seventh Circuit has 'left it to trial judges to exercise their discretion in evaluating [the Laffey matrix's] usefulness in any particular case,' *id.*, and courts in this district have accepted it as evidence of a reasonable hourly rate."); *Ozinga v. United States HHS*, 2018 U.S. Dist. LEXIS 85387, at *8 n.2 (N.D. Ill. May 22, 2018) ("The Laffey Matrix further supports these requested rates . . ."); *Collins v. Cargill Meat Sols. Corp.*, 2011 U.S. Dist. LEXIS 69316, at *30 (E.D. Cal. June 28, 2011) ("Class Counsels' rates appear to fall within the reasonable rates of the Laffey Matrix.").

⁸ For instance, although the litigation substantially occurred in large metropolitan areas, Birmingham for the most part but Atlanta too (site of many expert depositions), it was not national in scope.

⁹ This lodestar and the lodestar employing the Laffey rates are not enhanced by a multiplier, even though multipliers are appropriate and frequently used to support lodestar cross-checks of fee awards. *See e.g., Chieftain Royalty Co. v. Xto Energy*, 2018 U.S. Dist. LEXIS 225922, at *37 (E.D. Okla. Mar. 27, 2018) ("Thus, the requested \$32 million fee represents an enhancement lodestar multiplier of 2.58408. This multiplier is well within the range of multipliers approved in the Tenth Circuit, and other circuits, *when a lodestar cross-check is used.*" (emphasis added) (internal citation omitted)).

amendment, successfully opposing the first dispositive motions, and discovery. All of that work should be taken into account, and crediting it adds another 2,006.15 hours of attorney time to support this motion, boosting the lodestar for work on behalf of the Class by another \$684,980. *See* Exhibit 1 at ¶ 7. That is greater evidence of reasonableness.

C. The Expense Amount Requested Is Warranted.

The \$845,353 in expenses detailed and documented in Exhibit 1 were necessitated by the burdens the Class Representatives bore on the difficult, complex, and intertwined issues resolved and extinguished by the Settlement. The excellent benefits of the Settlement would not have been attained or possible without the work the expenditures enabled. The showing above on “The Time Involved and Results Obtained” (first *Johnson* factor) supports that conclusion.

\$758,523 of the expenses funded highly effective and intrepid work of experts (1) on the contaminants’ chemical properties and health effects, PFAS fate and transport, PFAS presence (or absence) on residential properties and effects if any on property values, and standards of care for the Defendants’ facilities, and (2) to determine class membership and damages and develop a distribution plan for Settlement payments. *See* Exhibit 1 at ¶ 6 & exh. b (HGD expense category “expert”). The expenditures are summed for each expert (by firm name, Forensic Strategic Solutions, for example, or by individual name, Phillipe A. Grandjean for

example) in Exhibit C of Exhibit 1. The expenditures also enabled proficient examination of the vast number of documents produced and potentially relevant to the claims for the Class. *See id.* (\$260,429.19 sum of payments to Cicayda).

Other components of the full sum of expenses sought paid for subpoenas to and document production from third parties, specifically the water utilities whose customer data and distribution system records were necessary to determine the Class and damages, among other subjects. Exhibit 1 at ¶ 6 & exh. b (HGD expense categories “copies,” “misc,” “printing,” “subpoena, and “filing fees”). Those components total \$32,733.35. *Id.*¹⁰ \$40,712.17 of the full sum sought paid for depositions and required travel for depositions and site visits and investigation. *See id.* (“court cost,” “travel,” and “depo” categories for HGD plus “Corrected Ledger of Expenses Advanced by Hannon Law Firm, LLC”). This component enabled Class Counsel Kevin Hannon, who has great expertise in PFAS cases, to travel to meet with, prepare, and represent expert witnesses and the Class Representatives. \$11,596.62 was expended by HGD on research, *id.* (“research” category), a modest amount given the protracted and hard-fought motions practice on complex issues.

As the record demonstrates, this litigation was arduous, complex, and hard

¹⁰ This component sum backs out items which do not fit the instant description of the components. “Misc” for instance contains two \$200 notary items and a CLE expense of \$358.33 not included in the sum. The CLE expense is not included in any of the expenses sought by the movants.

fought at every turn. Defendants were represented by counsel experienced in environmental litigation who made this a difficult, time consuming, and expensive case to litigate. The expenses Class Counsel incurred, while significant and risky, were absolutely necessary to achieve the result which is now before the Court for approval.

For the reasons given, the \$845,353 in expenses documented in Exhibit 1 are warranted and should be awarded to Class Counsel. Additional expenses may be incurred. For example, depending on the character of objections to the Settlement (if any), expert testimony at the fairness hearing may become advisable.

Conclusion

This motion should be granted for the reasons given.

Respectfully submitted this the 1st day of December, 2021, by:

/s/ Christopher B. Hood
Christopher B. Hood (ASB-2280-S35H)
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Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of December, 2021, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all known counsel of record by operation of the court's electronic system.

/s/ Christopher B. Hood
Christopher B. Hood

EXHIBIT 1

2. I and my partners Lew Garrison and Chris Hood are Class Counsel in this case, together with Kevin Hannon of the Hannon Law Firm, LLC, in Denver, Colorado. We have represented the Class Representatives since July of 2018. The amount of our work on behalf of the Class is reported in Exhibit A of this Declaration, where the attorney hours of Class Counsel (myself and Messrs. Garrison, Hood, and Hannon) are stated, together with the attorney time expended for the Class by three senior associates of HGD (Mark Ekonen, Jeanie Sleadd, and Caroline Hollingsworth). Time expended by junior associates and staff is not reported.

3. All the reported work of Class Counsel, inclusive of HGD's senior associates, was necessary, and the work efficiently and very powerfully advanced the case and the interests of the Class, leading to the Settlement.

4. Exhibit A shows that 4,098.49 attorney hours were expended on behalf of the Class. Those hours, multiplied by each attorney's hourly rate, produce a lodestar of \$3,261,997. The rate for each attorney is drawn from the Laffey Matrix, found at <http://www.laffeymatrix.com/see.html>, which counts years of experience from when the lawyer graduates from law school.

5. Each senior associate of HGD whose work for the Class is reported in Exhibit A has ten years of experience practicing in complex civil cases. The decades of experience of Class Counsel in complex civil litigation, including environmental cases of this type, are described in Docs. 202-45, 202-46.

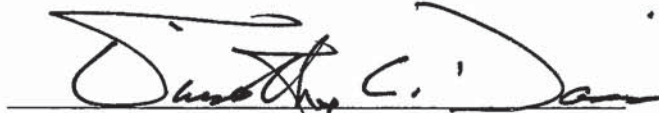
6. Class Counsel incurred \$845,353 in expenses advancing the case for the Class. \$828,578 were incurred by HGD, and \$16,775 were incurred by the Hannon Law Firm. These expenses are reasonable and were necessitated by difficult, complex, and intertwined issues in the case. Exhibit B of this Declaration, in itemized fashion, reports all of these expenses of the two law firms. Exhibit C reports them only for the experts employed, summing all the payments by expert, including the vendor which provided Class Counsel with indispensable assistance with document review.

7. In addition to the work of Class Counsel, the two law firms which previously served as counsel for the Plaintiffs in this case – Friedman Dazzio & Zulanas, P.C. and Davis & Whitlock, P.C. – devoted 2,006.15 hours of attorney time to litigating for the proposed class, producing a lodestar of \$684,980. That attorney time was expended on important tasks including, but not limited to, investigation, complaint drafting and amendment, successfully opposing the first dispositive motions, and discovery, according to records furnished to me by those two firms.

(signature on next page)

I declare under penalty of perjury that the foregoing declaration is true and correct to the best of my knowledge, information and belief.

Signed this 1st day of December, 2021, by:

A handwritten signature in black ink, appearing to read "Timothy C. Davis", written over a horizontal line.

Timothy C. Davis, Managing Partner

HENINGER GARRISON DAVIS, LLC

EXHIBIT A

KH Time Sheet 3M Alabama			
Billing Date	Attorney	Explanation	Hours
2/1/2019	KH	Emails to co-counsel re: Daikin patent, article re: PFOAs, info re: degradation studies, send 3 more articles	0.60
2/4/2019	KH	Initial meeting with Chris and Tim AAJ	1.00
2/12/2019	KH	Email to/from Tim re: assoc arrangements	0.20
3/1/2019	KH	Emails with Tim & Chris re: client prop inspections and pot'l experts	0.40
3/2/2019	KH	follow up Emails with Tim	0.30
3/4/2019	KH	Call with Tim, CBH, ME	1.00
3/8/2019	KH	Communications with CBH re 30(b)6 and inspection of client properties.	0.30
3/11/2019	KH	Travel Denver to Birmingham	4.70
3/11/2019	KH	Dinner meeting with Tim	1.50
3/12/2019	KH	Client property inspections	4.00
3/12/2019	KH	Conf call with Jeff Friedman, Lee Patterson, CBH re document database.	0.80
3/13/2019	KH	Travel Birmingham to Denver	4.70
3/13/2019	KH	Emails w/ Chris and Tim re: Friedman mtn	0.40
3/14/2019	KH	Call with Tim and Chris	0.20
3/20/2019	KH	Conference Call w/ Bryan Pate	2.00
3/20/2019	KH	Rvw Neal Declaration from Shaughnessy	0.50
3/22/2019	KH	Rvw Order Granting KSH pro hac vice	0.10
3/22/2019	KH	Status Conference	1.00
3/22/2019	KH	Communications with CBH and TCD re status conf.	0.30
3/27/2019	KH	Rvw Amd'd Scheduling Order re: exp rpts	0.20
4/5/2019	KH	Drop box link for 3M depos docs	0.20
4/8/2019	KH	Sent other case briefs to Mark, Chris, Tim	0.50
4/9/2019	KH	Meeting to discuss litigation strategy	0.40
4/9/2019	KH	Emails to Chris, Mark, Tim re: conf call 4/11	0.40
4/11/2019	KH	Conf call with Mark, Chris, Tim	0.40
4/11/2019	KH	Emails from Mark re: pot'l experts	0.30
4/16/2019	KH	Email Tim re: Crawford test results	0.10
4/18/2019	KH	Email to Tim to set up call	0.10
4/20/2019	KH	Conf call with Bryan Pate	2.00
4/26/2019	KH	Email Tim re: pot'l expert Randall Bell	0.20
4/26/2019	KH	Email from Chris re: issues for R Tackett	0.20
4/26/2019	KH	Communications with TD, CBH, MRE, WLG re potential expert.	0.30
4/26/2019	KH	Conf call with expert Connors	1.00
4/28/2019	KH	Email to Tim Chris Mark re: Bartell/ compounds found in soil at 3M	0.50
4/30/2019	KH	Call with Dr. Randall Tackett, Tim, Chris, Lew, Mark	1.00
5/1/2019	KH	Email from Chris re: round 1 test results from Shaun Crawford	0.30
5/3/2019	KH	Email to Tim and Chris re: R. Bell	0.20
5/4/2019	KH	Email to R. Bell cc Tim, Chris re: attached signed retainer ltr	0.50
5/4/2019	KH	Work on Amended Complaint	4.00
5/4/2019	KH	Conf call with CBH and TCD re experts, amending complaint, soil sample results.	1.00
5/5/2019	KH	Emails to /from Tim, Chris re: amending complaint, attaching drafts, jury	0.30
5/5/2019	KH	Work on Amended Complaint and scheduling order	4.00
5/6/2019	KH	Emails to/from Chis, Mark, Tim re: Round 2 test results	0.70
5/6/2019	KH	Work on Consolidated Individual Class Action Complaint	5.00
5/7/2019	KH	Emails to Chris, Tim re: info on interpreting PFAS lab reports	0.30
5/7/2019	KH	Emails to/from Chris Tim re: filing an erratum to Amd'd Complaint	0.40

5/13/2019	KH	Emails from Chris attaching RFPs to Daikin	0.40
6/3/2019	KH	Rvw Dfnts' Ans to 3d Amd'd Complaint	0.30
6/6/2019	KH	Rvw Dfnt's 3M and Dyneon Mem in Support of Mtn to Dismiss	0.40
6/6/2019	KH	Rvw Briefing Schedule	0.20
6/7/2019	KH	Communications with CBH and TCD re mass appraiser.	0.50
6/10/2019	KH	Review of complaint, briefs, previously filed motion to dismiss and Court's order sent by CBH to TCD, ME.	0.70
6/10/2019	KH	Rvw from CBH to TCD 3M's latest 10Q. Reviewed pertinent section on PFCs	0.50
6/10/2019	KH	Review of complaint, briefs, previously filed motion to dismiss and Court's order sent by CBH to MRE, TD.	0.30
6/12/2019	KH	Emails to/from Mark re: Alabama cases re: losses	0.50
6/12/2019	KH	Emails to/from Chris re: stock jury instructions; out of pocket expense of bottled water, etc	0.40
6/12/2019	KH	Work on Rspns to Mtn to Disimiss	3.00
6/12/2019	KH	Review of law on medical monitoring; communications with CBH, ME and TCD re this topic.	0.80
6/13/2019	KH	Work on Rspns to Mtn to Disimiss	4.00
6/14/2019	KH	Emails to/from Chris re: medical monitoring	0.30
6/14/2019	KH	Prepare and file Pltfs' Opp to Mtn to Dismiss	6.00
6/17/2019	KH	Rvw email from Tim re: conf call schedule	0.10
6/18/2019	KH	Email from Dfnt requesting ext to respond to RFP	0.10
6/19/2019	KH	Rvw Dfnts' Brief in Support of Mtn to Dismiss	0.30
6/19/2019	KH	Conf call with co-counsel re: property appraisals	1.00
6/21/2019	KH	Email from Chris re: developing search terms, rvw email from Dfnt on terms	0.10
6/26/2019	KH	Rvw Emails between C Hood and Dfnt re: search terms, re: Science day for	0.40
6/28/2019	KH	Communications with TCD and CBH re invoice from expert.	0.20
7/1/2019	KH	Rvw Email from Dfnt re: responses to RFP	0.30
7/9/2019	KH	Rvw email from Chris re: appraiser and site visit set form July 10	0.10
7/9/2019	KH	T/c with Appraiser Edmond Eslava	1.50
7/10/2019	KH	Rvw Emails from Chris re: conf call, rvw draft list of search terms	0.40
7/11/2019	KH	Email to Tim, Mark, Chris re: Buddy	0.10
7/13/2019	KH	Rvw Email from Chris re: conf call	0.10
7/14/2019	KH	Emails to/from Chris re: conf call	
7/15/2019	KH	Emails to/from Tim Chris Mark re: Tennessee river fish studies, GAC ineffective at removing PFBA, setting conf call	0.40
7/16/2019	KH	Emails to/from Chris, Mark re: 3M Ala search terms, work on revising lists	0.70
7/16/2019	KH	Rvw memo from TCD re PFOA, medical surveillance, etc.	0.20
7/16/2019	KH	Call with TCD, ME and CBH re health advisories and scientific data.	0.70
7/16/2019	KH	Call with MRE, TD and CBH re health advisories and scientific data.	0.60
7/24/2019	KH	Emails to/from Chris, Tim re: conf call on blended water	0.20
7/29/2019	KH	Email Chris sending images	0.30
7/29/2019	KH	Mtg. with TCD in San Diego.	1.00
8/1/2019	KH	Emails to Chris & Mark re: follow up on discovery responses from Daikin, bill for Randy Bell	0.20
8/6/2019	KH	Rvw Email from Dfnt re: responses to RFP	0.30
8/9/2019	KH	Tel. conf. with MRE, CBH and TD re expert.	0.30
8/16/2019	KH	Emails to/from Chris, Tim re: deadlines, conf calls, discovery requests	0.60
8/19/2019	KH	Email to Chris re: disc rqst objection	0.50
8/28/2019	KH	Email to Chris re: meeting	0.10
8/29/2019	KH	Rvw and respond to email re: doc collection time	0.30
9/3/2019	KH	Email to chris re: status of modified schedule for expts	0.10

9/3/2019	KH	Emails from/to Chris re: amd'd complaint	0.20
9/3/2019	KH	Email requesting copy of Allstate Brief	0.10
9/4/2019	KH	Rvw letter to Christian King re: prop insp	0.10
9/6/2019	KH	Emails to/from Chris re: inspection of Daikin property	0.40
9/9/2019	KH	Review email requesting inspection; rqst video of property by KSH to C Hood	0.20
9/10/2019	KH	Work on Mtn for Class Cert	4.00
9/11/2019	KH	Review Email from Connors re: travel and video of property inspection	0.20
9/11/2019	KH	Rvw Email travel arrangements by Connor	0.10
9/16/2019	KH	Emails to/from C Hood re class cert deadline push back date	0.20
9/18/2019	KH	Rvw Email from Chris to Brettlyn Miller re: research on 3M and Daikin pollution	0.10
9/18/2019	KH	Email to Chris re: depo prep	0.10
9/22/2019	KH	Send links to Chris re: Alabama drinking water	0.20
9/27/2019	KH	Email draft of class cert memo to Chris	0.10
9/28/2019	KH	Work on Mtn for Class Cert	3.00
9/29/2019	KH	Work on Mtn for Class Cert	2.00
10/1/2019	KH	Rvw Order Re: Pretrial deadlines	0.10
10/1/2019	KH	Rvw Email from Chris re: Lindsey and Watkins declaration	0.30
10/1/2019	KH	Revisions on declarations, email to Chris	1.50
10/2/2019	KH	Response to email from Chris re: class mtn deadline and deposing Ptf's	0.10
10/2/2019	KH	Emails to/ from Chris re: nuisance question; dates available for depo prep	0.40
10/4/2019	KH	Email to Tim, Chris, Mark re: Daikin now AFFF MDL	0.10
10/14/2019	KH	Tel. conf. with TCD and CBH re discovery, experts, etc.	1.40
10/15/2019	KH	Emails from/to Chris re: Connors' property inspection	0.20
10/23/2019	KH	Email to Chris, Mark re: date gac operational at WMEL	0.10
10/24/2019	KH	Email re: alternate sources of PFAs	0.10
11/1/2019	KH	Email to Chris re: depo prep video; travel schedules	0.20
11/3/2019	KH	Email to Chris re: request depo schedule	0.10
11/4/2019	KH	Emails from /to Chris re: inspection schedules	0.10
11/5/2019	KH	Rvw emails from Chris re: Crawford affidavit, Connors' email re: sampling	0.40
11/6/2019	KH	Email to Chris re: phone call	0.10
11/6/2019	KH	Conf. call with TCD and CH re client depo prep, site inspection, class cert motion,	1.50
11/12/2019	KH	Travel Denver to Birmingham	4.70
11/13/2019	KH	Client depo prep	4.00
11/14/2019	KH	Client depo prep	4.00
11/14/2019	KH	Email Chris article on PFAs	0.10
11/14/2019	KH	Email to co-counsel re: working on brief for Class Certification	0.20
11/14/2019	KH	Work on Class Certification Brief	4.00
11/15/2019	KH	Email co-counsel brief draft	0.10
11/15/2019	KH	Travel Birmingham to Denver	4.70
11/16/2019	KH	Work on Class Certification Brief	5.00
11/18/2019	KH	Email to Tim, Chris re: photos work product from site inspection	0.40
11/18/2019	KH	Email to Chris, Tim re: photos and files from site inspection	0.20
11/19/2019	KH	Travel Denver to Birmingham	4.70
11/20/2019	KH	Inspection of Daikin America with Dr. Connors	2.00
11/20/2019	KH	Prep of clients for deposition; meeting with CBH and TCD.	4.00
11/21/2019	KH	Class Rep deposition	4.00
11/22/2019	KH	Class Rep deposition	4.00
11/22/2019	KH	Travel Birmingham to Denver	4.70
11/23/2019	KH	Review of draft of factual section of class cert brief	1.20
11/23/2019	KH	T/c with Grandjean	1.40
11/24/2019	KH	Email to Chris, Mark, Tim re: trial exhibit of test results	0.10
11/24/2019	KH	Email to Chris re: ethylene oxide	0.10

11/25/2019	KH	Prepare and file Pltfs' Mtn for Leave to Exceed Page Limits	0.40
11/25/2019	KH	Email from/to Chirt re: Pate facts; meeting schedule with Pate	0.20
11/26/2019	KH	Rvw Dfnt Daikin's Memo in Rspns to Mtn for leave to exceed page limits	0.10
11/26/2019	KH	Work on Class Certification Brief	3.00
11/26/2019	KH	Email to co-counsel re: setting up conf call re: brief for Class Certification	0.10
11/26/2019	KH	Rvw Daikin's Mtn to Join Daikin's Memo re: exceed page limits	0.10
11/26/2019	KH	Email to Chris re: 2010 tests as exhibit	0.10
11/26/2019	KH	Email from/ to Chris re: Dfnts' ques on discovery responses	0.20
11/27/2019	KH	Work on Class Certification Brief	3.00
11/27/2019	KH	Email to co-counsel re: Judge's brief requirements	0.20
11/27/2019	KH	Email to co-counsel re: class reps affidavits	0.10
11/29/2019	KH	Emails to co-counsel re: brief review	0.20
11/29/2019	KH	Emails from/to Chris re: brief	0.50
11/29/2019	KH	Work on Class Certification Brief	5.00
11/30/2019	KH	Emails from/to Chris re: brief	0.70
12/1/2019	KH	Work on Class Certification Brief	5.00
12/1/2019	KH	Emails to/from Tim re: brief status	0.30
12/2/2019	KH	Work on Class Certification Brief	4.00
12/2/2019	KH	Emails to/from Chris, Tim re: brief issues of bad water, medical monitoring, prop value, exhibits, public nuisance, Crawford declaration	1.50
12/2/2019	KH	Email to Chris re: KSH affidavit, sent Aff of Dodd to Chris	0.10
12/3/2019	KH	Email to Chris, Tim re: class members	0.70
12/3/2019	KH	Email Chris KSH CV	0.10
12/3/2019	KH	Rvw email from Chris re: Filing verification of Mtn to Certify Class	0.40
12/3/2019	KH	Prepare and file Pltfs' Mtn and Memo for Class Certification	6.00
12/4/2019	KH	Emails to/from Chris re: conf call	0.30
12/4/2019	KH	Conf call with co-counsel re: depos	0.50
12/9/2019	KH	Email 30(b)(6) depo notice to Chris	0.10
12/9/2019	KH	Review of expert reports; tel conf. with ME, CBH, WLG and TCD	1.50
12/9/2019	KH	Review expert reports; tel conf. with TD, CBH, WLG and MRE	0.50
12/9/2019	KH	Rvw 3M's Mtn to Strike Pltf's Mtn for Class Cerification	0.30
12/10/2019	KH	Email to Tim, Chris sending Grandjean report	0.20
12/12/2019	KH	Email to Mark, Desiree, Tim re: docs experts did not rely on	0.20
12/13/2019	KH	Email to Chris, Tim re: Pate depo prep	0.10
12/13/2019	KH	Email to Chris re: exhibits experts considered	0.10
12/13/2019	KH	Conf call with expert Grandjean	2.00
12/13/2019	KH	Conf call with co-counsel	1.00
12/15/2019	KH	Communications with TCD and CBH re experts; scheduling depositions; review of scientific article.	0.60
12/17/2019	KH	Rvw email from paralegal re: Jim Tarr	0.10
12/17/2019	KH	Conf. call with expert with CBH and TCD.	1.00
12/19/2019	KH	Email to Chris re: Dfnts' rule 26 reports	0.20
12/20/2019	KH	Rvw email from Chris re: adding Venetia as class rep	0.10
12/20/2019	KH	Rvw email from Chris to Dfnts re: exp depos	0.20
12/23/2019	KH	Rvw email from Dfnts re: response to Hood's letter re: expert depos	0.30
12/23/2019	KH	Email to Chris, Tim re: briefing and experts, rvw letter from Dfnts	0.20
12/24/2019	KH	Communication with TCD re: potential expert	0.40
12/26/2019	KH	T/c with Grandjean	1.50
12/28/2019	KH	Conf call with potential expert; follow-up communications with CBH, TD and MRE	2.00
12/29/2019	KH	Travel Denver to Santa Ana	4.50
12/30/2019	KH	Depo prep Detwiler	5.00
12/30/2019	KH	Travel Santa Ana to Denver	4.50

12/30/2019	KH	Rvw email from paralegal re: Jim Tarr	0.10
12/30/2019	KH	Conf call with CBH, ME and TCD; communication with defense counsel	1.40
1/1/2020	KH	Travel Denver to Atlanta	5.00
1/2/2020	KH	Depo prep Ryan and Detwiler	6.00
1/2/2020	KH	Emails to/from co-counsel re: expt reports	0.30
1/3/2020	KH	Deposition of Detwiler	5.25
1/3/2020	KH	Travel Atlanta to Denver	5.00
1/4/2020	KH	Emails re: travel arrangement	0.10
1/4/2020	KH	Work on expert reports	7.00
1/5/2020	KH	Emails to/from Tim re: expert rpts	0.10
1/5/2020	KH	Emails to/from Chris re: Pate's draft, Connor report	0.40
1/5/2020	KH	Work on expert reports	4.00
1/6/2020	KH	Conf call with Tim Davis	0.60
1/6/2020	KH	Emails to co-counsel re: Dfnts' affidavits against class cert	0.30
1/6/2020	KH	Emails to/from co-counsel re: exp affs	0.30
1/6/2020	KH	Rvw Billings Pltfs' Mtn for Leave to Intervene and their Objection to Pltfs' Mtn for Class Certification	0.20
1/6/2020	KH	Rvw Dfnt's Rspns to Pltfs' Mtn for Class Certification	0.60
1/6/2020	KH	Rvw email re: Mtn to Intervene by Billings Pltfs	0.20
1/6/2020	KH	Prepare and file expert disclosures	6.00
1/7/2020	KH	Rvw Evidentiary Submission in Support of Daikins' respons to Pltfs' Mtn for Cert	0.30
1/9/2020	KH	Depo prep of Ryan	6.00
1/13/2020	KH	Pltfs' Opp to Billings Pltfs' Mtn for Leave to Reply In Support of Mtn to Intervene	4.00
1/13/2021	KH	Rvw Billings Pltfs' conditional reply to Pltfs' Response in Opp to Mtn to Intervene	0.30
1/7/2020	KH	Email to co-counsel re: std of care dealline	0.30
1/7/2020	KH	Email to Chris, Mark re: waiving medical privilege	0.10
1/8/2020	KH	Email to co-counsel re: reference table	0.10
1/8/2020	KH	Prepare Affidavit of KH	0.60
1/19/2020	KH	Travel Denver to Atlanta	5.00
1/9/2020	KH	Depo prep Ryan	5.50
1/20/2020	KH	Emails to co-counsel sending various articles	0.60
1/21/2020	KH	Deposition of Ryan	7.50
1/21/2020	KH	Travel Atlanta to Denver	5.00
1/27/2020	KH	Emails to co-counsel sending 3M resignation letter; suggestion on statements; time for exp disclosures; articles on PFOAs, EPA info, Scotchguard, rising levels in	0.90
1/28/2020	KH	Meet and confer re: Lindsey 30(b)(6) notice	0.40
1/28/2020	KH	Email to co-counsel sending publication on med monitoring	0.10
1/29/2020	KH	Email to co-counsel sending fed grand jury	0.10
1/30/2020	KH	Travel Denver to Boston	6.00
1/31/2020	KH	Deposition of Barbara Beck	6.00
2/1/2020	KH	Email to Tim, Chris sending info on med monitoring	0.10
2/1/2020	KH	Rvw Billings' Opp to Class Certification	0.20
2/3/2020	KH	Deposition of Grandjean	8.00
2/3/2020	KH	Travel Boston to Denver	6.00
2/3/2020	KH	Email to Tim re: Grandjean depo	0.10
2/6/2020	KH	Emails to co-counsel sending publications	0.60
2/6/2020	KH	T/c with Tim Davis re: Daikin docs	0.50
2/6/2020	KH	Meeting to discuss doc review findings with KH, Chris, Tim, Caroline and Mark	1.50
2/11/2020	KH	Emails from/to Tim re: Greenburg depo, issuing subpoena	0.20
2/13/2020	KH	Travel Denver to Philadelphia	5.50
2/14/2020	KH	Deposition of Greenberg	6.00
2/14/2020	KH	Travel Philadelphia to Denver	5.50

2/14/2020	KH	Rvw Brief in Support of Mtn to Dis 3M et al	0.40
2/17/2020	KH	Rvw email re: Chicago depo	0.10
2/18/2020	KH	Email to Chris. Tim re: travel	0.10
2/19/2020	KH	Rvw Daikins' Answer to 3d Amd Complaint	0.80
2/19/2020	KH	Travel Denver to Birmingham	4.70
2/21/2020	KH	Daikin 30(b)(6) depo	3.00
2/21/2020	KH	Rvw Mtn to Continue Subpoena re: West Lawrence Water	0.20
2/21/2020	KH	Travel Birmingham to Denver	4.70
2/25/2020	KH	Travel Denver to San Jose CA	4.70
2/26/2020	KH	Deposition of Frankel	6.50
2/26/2020	KH	Travel San Jose CA to Denver	4.70
2/27/2020	KH	Email to co-counsel re: theme of Frankl depo	0.20
2/28/2020	KH	Rvw Ptf's Rspns in Opp to Mtn to Continue Subpoena	0.20
3/1/2020	KH	Email to co-counsel sending exh 52	0.10
3/2/2020	KH	Email to Chris, Tim re documents	0.10
3/2/2020	KH	Email to co-counsel sending 3M Tox research, Project Priorities, 2003 Meeting, Exh list, Mtn to amend	0.40
3/3/2020	KH	Emails from/to Chris re: 3M objections	0.10
3/4/2020	KH	Rvw email letter from C. King re discovery rqst issues, blood work	0.40
3/6/2020	KH	Rvw Ntc of Hearing	0.10
3/6/2020	KH	Rvw email from Judge Kallon's clerk; letter to Judge re: hearing	0.10
3/9/2020	KH	Email to co-counsel sending emissions report, inquiry about co-counsel's call w/ Daikine counsel re: discovery	0.20
3/10/2020	KH	Email to Tim re: Veritext bills	0.10
3/13/2020	KH	Email to co-counsel sending EPA rule	0.10
3/14/2020	KH	Email to Co-counsel sending press info, seminar info, articles	0.70
3/15/2020	KH	Emails to Co-counsel sending brief draft, articles, rvw of docs	0.40
3/17/2020	KH	Email to Co-counsel sending documents, sending Beck depo transcript	0.40
3/17/2020	KH	Conference call with counsel	1.00
3/20/2020	KH	Conference call re: discovery	0.30
3/24/2020	KH	Rvw email from Chris to Judge re: unresolved matters	0.10
3/25/2020	KH	Email to Tim re: settlement deadline	0.10
3/26/2020	KH	Conference call re: discovery schdl	0.40
3/27/2020	KH	Rvw emails from co-counsel and judge re: discovery conf	0.20
3/27/2020	KH	Conf call with Judge Abdul	0.50
4/2/2020	KH	Rvw Dftns' Mtn for Summary Judgment	0.30
4/3/2020	KH	Rvw Briefing Schedule re: MSJ	0.10
4/17/2020	KH	Rvw Mtn for Discovery under F Rule of Civ. P. 56	0.20
4/19/2020	KH	Work on Opposition to Mtn for SJ	3.00
4/20/2020	KH	Work on Opposition to Mtn for SJ	1.60
4/21/2020	KH	Rvw Dfts' Rspns to Mtn for Discovery	0.10
4/22/2020	KH	Work on Opposition to Mtn for SJ and Reply in Support for Relief re: Discovery	2.50
4/23/2020	KH	Work on Rspns to Dftns' MSJ	3.00
4/23/2020	KH	Emails to/from co-counsel re: brief data/inserts	1.50
4/27/2020	KH	Emails from/to co-counsel re: Daubert	0.40
5/2/2020	KH	Email to co-counsel sending working notes	0.20
5/5/2020	KH	Emails to/from Tim re: conf call	0.10
5/8/2020	KH	Conf call with co-counsel re: depositions	1.00
5/11/2020	KH	30(b)(6) depo prep	3.00
5/12/2020	KH	30(b)(6) depo prep	3.00
5/13/2020	KH	30(b)(6) depo prep	3.00
5/14/2020	KH	30(b)(6) deposition	3.00

5/21/2020	KH	Rvw Joint Mtn for Ext re: expert deadlines	0.10
6/3/2020	KH	Rvw Order re: Extension of expert deadlines	0.10
6/8/2020	KH	Rvw Joint Mtn for Ext re: Rspns to Mtn for SJ and Daubert Mtns	0.10
6/12/2020	KH	Conference call with Tim and Chris	0.60
6/18/2020	KH	Rvw Order granting Mtn for Extension	0.10
6/22/2020	KH	Depo prep Connors	6.00
6/24/2020	KH	Depo prep Pardue	5.00
6/25/2020	KH	Work on Opposition to Mtn for SJ	5.00
6/27/2020	KH	Work on Opposition to Mtn for SJ	4.00
6/28/2020	KH	Work on Opposition to Mtn for SJ	5.00
6/29/2020	KH	Prepare Rspns to Dfnts' MSJ to file	6.00
9/27/2020	KH	Draft Proposed notice plan and long form notice	3.00
11/16/2020	KH	Work on Pltff's Opp to Mtn to Dismiss	4.00
11/17/2020	KH	Prepare Pltfs' Opp to Mtn to Dismiss	6.00
1/26/2021	KH	Drafting of motion for preliminary approval	4.50
		TOTAL HOURS	446.15

Date	Case Name	Attorney	Hours	Explanation
7/31/2018	3M Water Litigation	Caroline U. Hollingsworth	3.4	Research on previous 3M water cases
7/31/2018	3M Water Litigation	Caroline U. Hollingsworth	0.2	Emails to Chris regarding previous 3M water cases
9/27/2018	3M Water Litigation	Caroline U. Hollingsworth	0.5	Emails from Chris to Mark, Desiree and Tim Doc Review
9/28/2018	3M Water Litigation	Caroline U. Hollingsworth	0.1	Emails with Tim re user account with Access Data
11/26/2018	3M Water Litigation	Caroline U. Hollingsworth	0.1	Emails from Chris to Mark, Tim, Desiree, Bill, Lew and me Summation hosting 3M docs
1/8/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Email from Chris to Mark, Desiree, Tim, Bill and me re 11 new client sign ups and our need to interview them on the listed topics
1/9/2019	3M Water Litigation	Caroline U. Hollingsworth	0.5	Meeting on 3m Class Reps with Mark and Desiree
1/9/2019	3M Water Litigation	Caroline U. Hollingsworth	1.3	Calling and interviewing clients for class reps
1/9/2019	3M Water Litigation	Caroline U. Hollingsworth	0.6	Review of 3M Complaint
1/9/2019	3M Water Litigation	Caroline U. Hollingsworth	0.1	Emails with Chris, Mark, Desiree, Bill and Desiree about interviews with potential 3M class reps
1/10/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Emails with Chris, Mark, Desiree, Bill, Tim and Desiree about interviews with potential 3M class reps
1/11/2019	3M Water Litigation	Caroline U. Hollingsworth	0.1	Emails with Chris, Mark, Desiree, Bill, Tim and Desiree about interviews with potential 3M class reps
1/12/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Review of Washington Post article on water contamination
1/14/2019	3M Water Litigation	Caroline U. Hollingsworth	0.1	Emails with Chris, Mark, Desiree, Bill, Tim about interviews with potential 3M class reps
1/26/2019	3M Water Litigation	Caroline U. Hollingsworth	0.1	Email with Chris, Mark, Tim and Desiree about meeting with Shaun Crawford on Jan. 28 and meeting as a team beforehand.
1/28/2019	3M Water Litigation	Caroline U. Hollingsworth	1.5	Meeting to discuss 3M Class Reps
1/28/2019	3M Water Litigation	Caroline U. Hollingsworth	0.6	Research contact info on 3M clients/class reps
1/30/2019	3M Water Litigation	Caroline U. Hollingsworth	3.4	Reserched and called facilities to do PFOA Testing
1/31/2019	3M Water Litigation	Caroline U. Hollingsworth	0.1	Email to Caroline, Mark, Desiree, and Chris re dividing up depositions to summarize.
2/5/2019	3M Water Litigation	Caroline U. Hollingsworth	2.9	Summaried James Kotsmith Depo
2/6/2019	3M Water Litigation	Caroline U. Hollingsworth	4.1	Summaried James Kotsmith Depo
2/7/2019	3M Water Litigation	Caroline U. Hollingsworth	0.6	Summaried James Kotsmith Depo
2/14/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Emails with Chris, Tim and Desiree re: Kottsmith and Purdy Depo Summaries
2/15/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Emails with Tim, Lew, Mark, Desiree, Bill re: customer service lists
3/22/2019	3M Water Litigation	Caroline U. Hollingsworth	0.1	Emails with Mark and Desiree re: 3M service map
3/22/2019	3M Water Litigation	Caroline U. Hollingsworth	1.6	Reviewed 3M Customer Service Map
7/12/2019	3M Water Litigation	Caroline U. Hollingsworth	0.5	Meeting with Mark and Desiree re: 3M Document Review
7/12/2019	3M Water Litigation	Caroline U. Hollingsworth	1.5	3m Doc Review
7/14/2019	3M Water Litigation	Caroline U. Hollingsworth	1.8	3m Doc Review
7/15/2019	3M Water Litigation	Caroline U. Hollingsworth	3.7	3m Doc Review
7/24/2019	3M Water Litigation	Caroline U. Hollingsworth	2.4	3m Doc Review
7/25/2019	3M Water Litigation	Caroline U. Hollingsworth	1.4	3m Doc Review
7/26/2019	3M Water Litigation	Caroline U. Hollingsworth	2.1	3m Doc Review
7/27/2019	3M Water Litigation	Caroline U. Hollingsworth	3.1	3m Doc Review
7/29/2019	3M Water Litigation	Caroline U. Hollingsworth	2.5	3m Doc Review
7/30/2019	3M Water Litigation	Caroline U. Hollingsworth	2.5	3m Doc Review
8/1/2019	3M Water Litigation	Caroline U. Hollingsworth	2.0	3m Doc Review
8/12/2019	3M Water Litigation	Caroline U. Hollingsworth	0.1	Emails with Chris and Desiree on meeting
8/13/2019	3M Water Litigation	Caroline U. Hollingsworth	0.6	Meeting with Chris and Desiree re: discuss discovery request of DAI
8/14/2019	3M Water Litigation	Caroline U. Hollingsworth	3.1	Work on Discovery Responses to DAI IROGS and RFP
8/15/2019	3M Water Litigation	Caroline U. Hollingsworth	3.2	Work on Discovery Responses to DAI IROGS and RFP
8/19/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Emails with Chris; read DAI Objections and Responses to P's Requests for Production
8/22/2019	3M Water Litigation	Caroline U. Hollingsworth	1.0	Work on Discovery Responses to DAI IROGS and RFP
8/23/2019	3M Water Litigation	Caroline U. Hollingsworth	0.9	Work on Discovery Responses to DAI IROGS and RFP
8/23/2019	3M Water Litigation	Caroline U. Hollingsworth	0.3	Emails with Chris and Desiree on Final Redline of Responses to DAI Discovery
8/26/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Meeting with Chris and Desiree on amended discovery responses to DAI
9/3/2019	3M Water Litigation	Caroline U. Hollingsworth	1.2	Document Review
9/4/2019	3M Water Litigation	Caroline U. Hollingsworth	1.5	Meeting With Tim, Chris, Mark and Desiree
9/9/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Emails with Lee Patterson re: Larry Watkins Test Results
9/11/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Emails with Chris and Desiree re: Larry Watkins Test Results
9/11/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Redacting Client info from Test Results
9/12/2019	3M Water Litigation	Caroline U. Hollingsworth	3.2	Work on 3M Litigation Claim Outline-Trespass
9/29/2019	3M Water Litigation	Caroline U. Hollingsworth	1.4	Work on 3m outline of of claims
10/2/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Emails with Chris, Tim, Lew, Desiree, Kevin Hannon on depositions/certification
10/21/2019	3M Water Litigation	Caroline U. Hollingsworth	2.0	Meeting with Tim, Mark, Desiree, Chris, Kevin re: to discuss strategy, internal planning
10/22/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Emails with Chris, Mark, Tim, Kevin Hannon, and James Connors on 3m/DAI site inspection and depositions
10/22/2019	3M Water Litigation	Caroline U. Hollingsworth	1.6	Document Review
10/23/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Phone call with Larry and Venetia regarding depositions
10/24/2019	3M Water Litigation	Caroline U. Hollingsworth	0.3	Emails with Mark and Chris regarding Rule 34 inspection notices
10/24/2019	3M Water Litigation	Caroline U. Hollingsworth	1.5	Document Review
10/25/2019	3M Water Litigation	Caroline U. Hollingsworth	4.3	Document Review
10/28/2019	3M Water Litigation	Caroline U. Hollingsworth	1.0	Meeting with Chris, Tim, Desiree, and Mark on discovery tasks.
11/4/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Review of Rule 34 notices
11/4/2019	3M Water Litigation	Caroline U. Hollingsworth	0.3	Emails with Chris, Kevin, Mark and James Connors re: Decatur inspection and class rep depositions
11/5/2019	3M Water Litigation	Caroline U. Hollingsworth	0.3	Review of Map/plotting of service area
11/14/2019	3M Water Litigation	Caroline U. Hollingsworth	1	Meeting with Tim, Chris, Mark, Jeanie and Desiree to address class cert brief/discovery
11/15/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Phone call with Chris and emails re: hiring of an investigation to do background check on 3M clients
11/15/2019	3M Water Litigation	Caroline U. Hollingsworth	1.4	Timeline of Dr. Conner's Report
11/17/2019	3M Water Litigation	Caroline U. Hollingsworth	0.9	Timeline of Dr. Conner's Report
11/17/2019	3M Water Litigation	Caroline U. Hollingsworth	1.2	Legal research re: can you use prior depositions from MN litigation for purposes other than impeaching a witness
11/19/2019	3M Water Litigation	Caroline U. Hollingsworth	5.0	Travel to Decatur, Boat Tour of 3M/DAI Facility
11/20/2019	3M Water Litigation	Caroline U. Hollingsworth	9.0	Site Inspection of DAI/3M and drive back from Decatur
11/21/2019	3M Water Litigation	Caroline U. Hollingsworth	0.7	Schedule Hotel/meet client for Hotel
11/23/2019	3M Water Litigation	Caroline U. Hollingsworth	3.1	Research on prior depositions being used at trial
11/24/2019	3M Water Litigation	Caroline U. Hollingsworth	2.4	Research on prior depositions being used at trial
11/24/2019	3M Water Litigation	Caroline U. Hollingsworth	0.2	Email with Tim on research of prior depositions being used at trial
11/26/2019	3M Water Litigation	Caroline U. Hollingsworth	0.1	Email with Tim on research of prior depositions being used at trial
12/2/2019	3M Water Litigation	Caroline U. Hollingsworth	3	Pulling cases for Class Cert Memo
12/2/2019	3M Water Litigation	Caroline U. Hollingsworth	3.4	Review of Tommy Lindsey Depo and Pulled notes on damages for Brief
12/2/2019	3M Water Litigation	Caroline U. Hollingsworth	1.0	Pulled cases from class cert brief
12/2/2019	3M Water Litigation	Caroline U. Hollingsworth	0.6	Pin Cites from Tommy Lindsey Depo
12/11/2019	3M Water Litigation	Caroline U. Hollingsworth	2.4	Talked to clients to gather documents to D
12/12/2019	3M Water Litigation	Caroline U. Hollingsworth	1.4	getting maps/photos/documents to D's
1/6/2020	3M Water Litigation	Caroline U. Hollingsworth	1.2	Review of 3M's response in opposition to motion to class cert.
1/6/2020	3M Water Litigation	Caroline U. Hollingsworth	1.3	Review of DAI's response in opposition to motion to class cert.
1/8/2020	3M Water Litigation	Caroline U. Hollingsworth	2.0	Meeting on 3M/DAI Reply Brief

1/12/2020	3M Water Litigation	Caroline U. Hollingsworth	1.5	Read case law cited in 3M Complaint
1/12/2020	3M Water Litigation	Caroline U. Hollingsworth	3.7	Read Daikin Response/reviewed citations
1/13/2020	3M Water Litigation	Caroline U. Hollingsworth	1.3	Meeting review of 3M/Daikin Response
1/14/2020	3M Water Litigation	Caroline U. Hollingsworth	0.7	Meeting with Jeanie, Mark and Chris to divide up reply brief sections
1/14/2020	3M Water Litigation	Caroline U. Hollingsworth	1.7	Review of Watkins/Lindseys Depo Transcript
1/15/2020	3M Water Litigation	Caroline U. Hollingsworth	4.2	Writing reply to 3M brief re. class cert
1/16/2020	3M Water Litigation	Caroline U. Hollingsworth	2.2	Writing reply to 3M brief re. class cert
1/20/2020	3M Water Litigation	Caroline U. Hollingsworth	4.3	reply to class cert.
1/21/2020	3M Water Litigation	Caroline U. Hollingsworth	7.1	reply for class cert
1/23/2020	3M Water Litigation	Caroline U. Hollingsworth	0.2	Emails regarding Purdue
1/29/2020	3M Water Litigation	Caroline U. Hollingsworth	0.1	Emails regarding Doc Review
1/29/2020	3M Water Litigation	Caroline U. Hollingsworth	1.5	Meeting with Chris, Tim, Jeanie and Mark re: 30(b)(6) depos, doc review, utility depos and research projects
2/3/2020	3M Water Litigation	Caroline U. Hollingsworth	2.1	DAI document Review
2/4/2020	3M Water Litigation	Caroline U. Hollingsworth	5.1	DAI document Review
2/5/2020	3M Water Litigation	Caroline U. Hollingsworth	3.4	DAI document Review
2/6/2020	3M Water Litigation	Caroline U. Hollingsworth	5.5	DAI document Review
2/7/2020	3M Water Litigation	Caroline U. Hollingsworth	3.0	DAI document Review
2/8/2020	3M Water Litigation	Caroline U. Hollingsworth	3.9	DAI document Review
2/9/2020	3M Water Litigation	Caroline U. Hollingsworth	4.3	DAI document Review
2/10/2020	3M Water Litigation	Caroline U. Hollingsworth	5.6	DAI document Review
2/11/2020	3M Water Litigation	Caroline U. Hollingsworth	0.5	Meeting with Tim, Jeanie and Mark on Doc Review
2/13/2020	3M Water Litigation	Caroline U. Hollingsworth	2.0	arranging hot docs for depo
2/14/2020	3M Water Litigation	Caroline U. Hollingsworth	1.5	arranging hot docs for depo
2/21/2020	3M Water Litigation	Caroline U. Hollingsworth	0.1	Discussion with Jeanie re: review of MN AG docs
2/23/2020	3M Water Litigation	Caroline U. Hollingsworth	2.6	3M MN AG Doc Review
2/24/2020	3M Water Litigation	Caroline U. Hollingsworth	2.5	Meeting with Tim, Chris, Jeanie and Mark re upcoming 3M 30(b)6, and what occurred during Daikin 30(b)6 and discovery items
2/24/2020	3M Water Litigation	Caroline U. Hollingsworth	0.5	Discussion with Jeanie about 3M docs and designation issues
2/25/2020	3M Water Litigation	Caroline U. Hollingsworth	0.1	Emails with Mark and Jeanie re: 3M Doc Review
2/25/2020	3M Water Litigation	Caroline U. Hollingsworth	3.2	3m Doc Review
2/26/2020	3M Water Litigation	Caroline U. Hollingsworth	2.9	3m Doc Review
2/27/2020	3M Water Litigation	Caroline U. Hollingsworth	1.8	3m Doc Review
2/28/2020	3M Water Litigation	Caroline U. Hollingsworth	2.1	3m Doc Review
3/2/2020	3M Water Litigation	Caroline U. Hollingsworth	0.1	3M Depo Meeting
3/3/2020	3M Water Litigation	Caroline U. Hollingsworth	1.3	Meeting to discuss 3m depo-Chris, Tim, Mark and Jeanie
3/4/2020	3M Water Litigation	Caroline U. Hollingsworth	3.4	3m Doc Review
3/5/2020	3M Water Litigation	Caroline U. Hollingsworth	3.2	3m Doc Review
3/6/2020	3M Water Litigation	Caroline U. Hollingsworth	2.5	3m Doc Review
3/7/2020	3M Water Litigation	Caroline U. Hollingsworth	4.3	3m Doc Review
3/8/2020	3M Water Litigation	Caroline U. Hollingsworth	3.1	3m Doc Review
3/10/2020	3M Water Litigation	Caroline U. Hollingsworth	0.1	Phone call with potential client/got details of injury
3/17/2020	3M Water Litigation	Caroline U. Hollingsworth	0.1	Review of 3M Meeting Agenda from Tim
3/17/2020	3M Water Litigation	Caroline U. Hollingsworth	1.5	Conference Call with Kevin, Jeanie, Tim, Chris and Mark discussing strategy
4/15/2020	3M Water Litigation	Caroline U. Hollingsworth	2.1	Read MSJ/pulled docs for depo
4/16/2020	3M Water Litigation	Caroline U. Hollingsworth	1.5	meeting to discuss summary judgment
4/19/2020	3M Water Litigation	Caroline U. Hollingsworth	3.0	meeting to discuss summary judgment
4/19/2020	3M Water Litigation	Caroline U. Hollingsworth	4.1	pulled facts for SJ motion from depos
4/20/2020	3M Water Litigation	Caroline U. Hollingsworth	1.2	Conference call with Tim, Chris, Jeanie, Mark re MSJ
4/20/2020	3M Water Litigation	Caroline U. Hollingsworth	3.0	pulled facts for SJ motion from depos
4/21/2020	3M Water Litigation	Caroline U. Hollingsworth	4.8	pulled facts for SJ motion from depos
4/21/2020	3M Water Litigation	Caroline U. Hollingsworth	6.0	SJ Motion
4/22/2020	3M Water Litigation	Caroline U. Hollingsworth	2.3	SJ Motion
4/23/2020	3M Water Litigation	Caroline U. Hollingsworth	12.0	SJ Motion
4/24/2020	3M Water Litigation	Caroline U. Hollingsworth	0.2	Email with Chris, Tim, Mark, Jeanie on MSJ
4/27/2020	3M Water Litigation	Caroline U. Hollingsworth	4.3	Pulled docs/annotated for 3m depo
4/28/2020	3M Water Litigation	Caroline U. Hollingsworth	5.6	Pulled docs/annotated for 3m depo
4/29/2020	3M Water Litigation	Caroline U. Hollingsworth	1.7	Pulled docs/annotated for 3m depo
5/1/2020	3M Water Litigation	Caroline U. Hollingsworth	0.4	uploading docs for 3m depo
5/10/2020	3M Water Litigation	Caroline U. Hollingsworth	0.1	Email with Tim Davis with docs for 3M Depo
5/28/2020	3M Water Litigation	Caroline U. Hollingsworth	0.1	Emails about Daubert Motions
6/5/2020	3M Water Litigation	Caroline U. Hollingsworth	2.4	checked citations to Daubert motions
6/7/2020	3M Water Litigation	Caroline U. Hollingsworth	1.1	checked citations to Daubert motions
7/13/2020	3M Water Litigation	Caroline U. Hollingsworth	0.2	Emails with Tim and Chris about Intake of Clients as Class Reps
7/13/2020	3M Water Litigation	Caroline U. Hollingsworth	1.8	Research on SOL for Personal Administrator/letters of administration
9/21/2020	3M Water Litigation	Caroline U. Hollingsworth	0.8	Conference call with CBGM JS and TD-discussing settlement agreement
			TOTAL	270

Date	Attorney	Hours	Explanation
7/25/2018	Jeanie Sleadd	0.5	Review Motion to Intervene
7/25/2018	Jeanie Sleadd	0.5	Review Reply to Motion to Appoint Interim Class Counsel
7/30/2018	Jeanie Sleadd	0.1	Email from Chris re: extension of time motion
7/30/2018	Jeanie Sleadd	0.2	Review Motion for extension of time
7/31/2018	Jeanie Sleadd	0.5	Review draft response to motion to intervene
7/31/2018	Jeanie Sleadd	0.5	Review Chris' edits to response to motion to intervene
8/4/2018	Jeanie Sleadd	0.5	Review Reply to Motion to Intervene
3/29/2019	Jeanie Sleadd	10	Conform motion for class cert in previous case to Alabama law and 11th Cir. Edit Motion for class cert
6/19/2019	Jeanie Sleadd	0.6	Review of Defendants' Reply Brief on Motion to Dismiss
6/27/2019	Jeanie Sleadd	2.5	Compare settlement class brief in other case to our class cert motion re: ascertainability
6/27/2019	Jeanie Sleadd	0.1	Email from Chris re: Motion for class cert
6/27/2019	Jeanie Sleadd	0.1	Email from Chris re: subpoenas
6/27/2019	Jeanie Sleadd	2	Prepare subpoenas to water works entities
6/27/2019	Jeanie Sleadd	0.1	Email from Chris with brief and exhibits for Preliminary Approval of Pro Tanto Class Action Settlement
6/27/2019	Jeanie Sleadd	0.5	Review of Doc. 74 - Preliminary Approval of Pro Tanto Class Action Settlement
8/26/2019	Jeanie Sleadd	2	Work on class cert motion
8/27/2019	Jeanie Sleadd	1	Work on class cert motion
10/5/2019	Jeanie Sleadd	4	Research on nuisance
10/6/2019	Jeanie Sleadd	2	Research on nuisance
10/8/2019	Jeanie Sleadd	4	Research on nuisance
10/9/2019	Jeanie Sleadd	4	Research on nuisance
10/21/2019	Jeanie Sleadd	2.5	Team meeting - Chris, Mark, Desiree, Caroline, Kevin, Tim

10/21/2019	Jeanie Sleadd	0.5	Review 2013 PFOA/PFOS test results
10/23/2019	Jeanie Sleadd	0.5	Review of WMEL PFOS/PFOA tests
10/23/2019	Jeanie Sleadd	3.5	Research on battery claim
10/23/2019	Jeanie Sleadd	0.1	Email from Chris to Mark and me re: research on battery claim
10/23/2019	Jeanie Sleadd	0.1	Email from Lew re: mental anguish
10/23/2019	Jeanie Sleadd	0.2	Email from Mark to Chris and me re mental anguish claim
10/23/2019	Jeanie Sleadd	0.1	Email from Chris re pattern jury instructions on battery
10/23/2019	Jeanie Sleadd	1	Review of expert James Connors' report
10/24/2019	Jeanie Sleadd	0.1	Emails with Tim, Chris, Mark and Caroline re: future team meeting
10/25/2019	Jeanie Sleadd	0.6	Emails amongst Mark, Tim, Caroline and me re: discovery on issue of alternative sources
10/25/2019	Jeanie Sleadd	0.1	Email from Mark re: hot doc
10/28/2019	Jeanie Sleadd	0.2	Emails with Mark re: argument that 3M delayed scientific community's knowledge of PFOS
10/28/2019	Jeanie Sleadd	2	Team meeting
10/28/2019	Jeanie Sleadd	0.5	Doc review prep
10/29/2019	Jeanie Sleadd	1.5	Work on chronology, timeline, facts of case
10/29/2019	Jeanie Sleadd	0.2	Review of email from Tim re timeline
10/29/2019	Jeanie Sleadd	0.2	Review of 3M Water Map
11/5/2019	Jeanie Sleadd	2.5	Work on chronology, timeline, facts of case
11/14/2019	Jeanie Sleadd	1.8	Work on chronology, timeline, facts of case
11/14/2019	Jeanie Sleadd	1	Review of Draft of Class Cert motion
11/14/22019	Jeanie Sleadd	1	Review of Draft of Connors Expert Report
11/15/2019	Jeanie Sleadd	0.5	Review of hot docs - PFOA Talking Points
11/26/2019	Jeanie Sleadd	0.1	Review of email from Tim re Dr. Purdy depo

11/29/2019	Jeanie Sleadd	0.5	Review of Mark's memo on Battery
11/22/2019	Jeanie Sleadd	0.5	Emails with Tim, Chris, Mark and me re: Battery Claim
12/2/2019	Jeanie Sleadd	1.5	Edit Affidavit of Bryan Pate
12/2/2019	Jeanie Sleadd	12.5	Work on motion for class cert
12/3/2019	Jeanie Sleadd	14	Work on motion for class cert
12/13/2019	Jeanie Sleadd	0.35	Research re: documents to produce for Pate
12/16/2019	Jeanie Sleadd	3.5	Research re: Pate as hybrid witness
1/6/2020	Jeanie Sleadd	1.5	Review of 3M's response in opposition to motion to class certification
1/6/2020	Jeanie Sleadd	1.5	Review of Daikin's response in opposition to motion to class certification
1/8/2020	Jeanie Sleadd	1	Work on list of fact witnesses due to be available for depo
1/13/2020	Jeanie Sleadd	4	Work on Reply brief outline
1/13/2020	Jeanie Sleadd	0.9	Read and analyze case law cited in 3M response
1/13/2020	Jeanie Sleadd	2.3	Meeting re: review of 3M/Daikin Response with Lew, Chris, Tim, Desiree, and Caroline, creation of outline and to do list.
1/13/2020	Jeanie Sleadd	0.1	Review of email re: response to motion to intervene
1/14/2020	Jeanie Sleadd	2	Review depo transcripts of Lindseys and Watkins
1/14/2020	Jeanie Sleadd	0.2	Phone call with Mark re: reply brief
1/14/2020	Jeanie Sleadd	0.7	Meeting with Caroline, Mark, and Chris to divide up reply brief sections
1/14/2020	Jeanie Sleadd	0.1	Update outline and email instructions to team
1/15/2020	Jeanie Sleadd	0.2	Emails to group re brief
1/15/2020	Jeanie Sleadd	4.8	Writing reply to 3M brief re class cert
1/16/2020	Jeanie Sleadd	0.5	Review Caroline's Notes of Daikin's Response

1/16/2020	Jeanie Sleadd	1	Reply brief - class cert
1/16/2020	Jeanie Sleadd	6.8	class cert reply brief; chat with Lew and Chris
1/17/2020	Jeanie Sleadd	7	Reply brief - class cert
1/18/2020	Jeanie Sleadd	0.1	Email with Tim re reply brief section
1/18/2020	Jeanie Sleadd	8	Work on reply brief for class cert
1/19/2020	Jeanie Sleadd	0.5	Email to Mark and Chris re: negligence section of reply brief
1/19/2020	Jeanie Sleadd	6.5	Work on reply brief for class cert
1/20/2020	Jeanie Sleadd	0.1	Email to Mark re: negligence section of brief
1/20/2020	Jeanie Sleadd	7.5	Reply to class cert
1/21/2020	Jeanie Sleadd	10.5	reply brief for class cert
1/23/2020	Jeanie Sleadd	1	Work on Timeline
1/23/2020	Jeanie Sleadd	0.1	Phone call with Tim re timeline to prep standard of care expert (Pardue)
1/24/2020	Jeanie Sleadd	1.5	Work on timeline for expert
1/26/2020	Jeanie Sleadd	2	Work on timeline
1/27/2020	Jeanie Sleadd	0.1	Review and respond to emails from Tim re: timeline, expert, and 3M meeting
1/27/2020	Jeanie Sleadd	3.1	Review expert report - Pardue
1/29/2020	Jeanie Sleadd	0.1	Emails re: doc review
1/29/2020	Jeanie Sleadd	1.5	Meeting with Chris, Tim, Caroline and Mark re: 30(b)(6) depositions, doc review, utility depositions, and research projects.
1/30/2020	Jeanie Sleadd	0.3	Come up with 3 Daikin 30(b)(6) objectives
1/31/2020	Jeanie Sleadd	0.3	Create 30(b)(6) doc
2/3/2020	Jeanie Sleadd	0.3	Review Daikin 30(b)(6) timeline
2/3/2020	Jeanie Sleadd	1.5	Doc Review (Daikin)
2/4/2020	Jeanie Sleadd	0.5	Doc review (Daikin)
2/4/2020	Jeanie Sleadd	0.5	Contact Erica Hale and Ed Gentile to set up meeting
2/4/2020	Jeanie Sleadd	2.3	Doc review (Daikin)
2/5/2020	Jeanie Sleadd	2.3	Doc Review (Daikin)

2/6/2020	Jeanie Sleadd	0.7	Doc review (Daikin)
2/6/2020	Jeanie Sleadd	1.5	Meeting to discuss doc review findings with Kevin Hannon, Chris, Tim, Caroline and Mark
2/7/2020	Jeanie Sleadd	1	Meeting with Ed Gentle and Erica Hale re: class definition, ascertainability and prep for upcoming spoke utility depositions. Chris and Tim in attendance.
2/7/2020	Jeanie Sleadd	1.2	Doc Review (Daikin)
2/8/2020	Jeanie Sleadd	5.5	Doc review - Daikin
2/9/2020	Jeanie Sleadd	3.5	Doc review (Daikin)
2/10/2020	Jeanie Sleadd	0.1	Review email from Mark
2/10/2020	Jeanie Sleadd	1	Review email and docs from Mark Ekonen
2/10/2020	Jeanie Sleadd	0.5	Review email and docs from Mark Ekonen
2/10/2020	Jeanie Sleadd	3.2	Daikin doc review
2/11/2020	Jeanie Sleadd	0.5	Prep for meeting re: document review for Daikin depo - other attendees - Tim, Caroline, and Mark
2/11/2020	Jeanie Sleadd	1	work on Daikin timeline
2/13/2020	Jeanie Sleadd	0.1	Email re EPA communication to industry re residents drinking water.
2/17/2020	Jeanie Sleadd	0.5	Review email from defense counsel with link to more discovery documents and internal discussions of late notice of docs
2/18/2020	Jeanie Sleadd	0.1	Email to Mark re 3M doc review
2/19/2020	Jeanie Sleadd	0.1	Email from Mark with assignment to review 30(b)(6) request and review MN AG docs
2/21/2020	Jeanie Sleadd	0.1	Discussion with Caroline re: review of MN AG docs
2/24/2020	Jeanie Sleadd	0.5	3M MN AG doc review
2/24.2020	Jeanie Sleadd	1	Email to Chris and Mark re: discovery requests and review of response and attached request
2/24/2020	Jeanie Sleadd	0.5	Discussion with Caroline re: 3M docs and designation issues
2/24/2020	Jeanie Sleadd	2.5	Meeting with Tim, Chris, Caroline and Mark re upcoming 3M 30(b)6, what occurred during Daikin 30(b)(6), and discovery items
2/25/2020	Jeanie Sleadd	0.1	Review of Mark's email to defense counsel re: priv log issues.
2/26/2020	Jeanie Sleadd	0.5	Doc review meeting

2/26/2020	Jeanie Sleadd	0.25	3M Doc review
2/27/2020	Jeanie Sleadd	0.5	Meeting with Tim to discuss research for motion to compel
2/27/2020	Jeanie Sleadd	0.9	Research for motion compel
2/27/2020	Jeanie Sleadd	0.1	Emails with Mark and Caroline re; 3M doc review
2/27/2020	Jeanie Sleadd	1.2	3M doc review
2/28/2020	Jeanie Sleadd	0.9	3M Doc review
2/28/2020	Jeanie Sleadd	0.2	Discussion with CBH about motion to compel
2/28/2020	Jeanie Sleadd	0.1	Review of response in opposition to motion to continue (WLWC)
3/2/2020	Jeanie Sleadd	0.1	Emails re 3M depo meeting
3/2/2020	Jeanie Sleadd	4.5	research for MTC
3/3/2020	Jeanie Sleadd	1.5	3M doc review
3/3/2020	Jeanie Sleadd	1.3	Meeting to discuss 3M depo - CBH, Tim, Mark, and Caroline
3/3/2020	Jeanie Sleadd	1.5	Review of Neal Declaration
3/3/2020	Jeanie Sleadd	0.1	Email to Lew re epidemiologist
3/4/2020	Jeanie Sleadd	0.4	Discovery research
3/5/2020	Jeanie Sleadd	2.2	Discovery research re: medical monitoring
3/5/2020	Jeanie Sleadd	0.3	Work on motion for discovery hearing
3/5/2020	Jeanie Sleadd	0.1	Email from Mark re doc review and MOU between 3M and EPA
3/5/2020	Jeanie Sleadd	0.7	3M Doc review
3/6/2020	Jeanie Sleadd	0.1	Email from Chris re: contacting court re discovery calendar
3/6/2020	Jeanie Sleadd	0.5	Drafting discovery dispute motion
3/6/2020	Jeanie Sleadd	0.1	Review of email to court re discovery dispute
3/6/2020	Jeanie Sleadd	0.1	Review of notice of hearing draft

3/9/2020	Jeanie Sleadd	1	3M doc review
3/9/2020	Jeanie Sleadd	2.3	3M Doc review
3/10/2020	Jeanie Sleadd	2	3M doc review
3/11/2020	Jeanie Sleadd	2.2	3M doc review
3/12/2020	Jeanie Sleadd	0.5	Create and file NOA
3/17/2020	Jeanie Sleadd	0.1	Review of agenda Tim created for meeting
3/17/2020	Jeanie Sleadd	1.7	Conference call with Kevin, Caroline, Tim, Chris, and Mark
3/18/2020	Jeanie Sleadd	1.5	3M doc review
3/23/2020	Jeanie Sleadd	0.1	Emails with Mark re: 3M depo prep
3/23/2020	Jeanie Sleadd	0.1	Review and respond to CBR's email about Gwin (Defense epi expert)
3/24/2020	Jeanie Sleadd	1.4	Research on underinclusion
3/26/2020	Jeanie Sleadd	0.5	Review court order
3/27/2020	Jeanie Sleadd	1.2	Doc review 3M
3/30/2020	Jeanie Sleadd	4.5	Doc Review
3/31/2020	Jeanie Sleadd	2.4	Doc review
4/1/2020	Jeanie Sleadd	3.7	3M doc review
4/2/2020	Jeanie Sleadd	2.6	3m doc review
4/3/2020	Jeanie Sleadd	0.5	Doc review
4/5/2020	Jeanie Sleadd	0.5	3M doc review
4/5/2020	Jeanie Sleadd	2.2	3M doc review
4/6/2020	Jeanie Sleadd	1.9	3M Doc review
4/7/2020	Jeanie Sleadd	1.4	3M doc review
4/8/2020	Jeanie Sleadd	3	3M doc review
4/15/2020	Jeanie Sleadd	2.6	Work on depo docs; review MSJ
4/16/2020	Jeanie Sleadd	0.2	Emails re: Ralph Werling's depo
4/16/2020	Jeanie Sleadd	1.5	MSJ conference call
4/16/2020	Jeanie Sleadd	1	Read and review MSJ and prep for conference call
4/18/2020	Jeanie Sleadd	0.5	Review email from Chris on MSJ response
4/18/2020	Jeanie Sleadd	2	Response to MSJ
4/19/2020	Jeanie Sleadd	0.1	Email from Chris re: format of response to MSJ
4/19/2020	Jeanie Sleadd	0.1	Email from Chris re: personal vs. physical injury
4/19/2020	Jeanie Sleadd	0.5	Email from Chris re undisputed facts for MSJ
4/19/2020	Jeanie Sleadd	0.1	Email re Grandjean Decatur Report and depo
4/19/2020	Jeanie Sleadd	0.5	Conference call
4/19/2020	Jeanie Sleadd	0.5	Emails discussing "heat facts" from depo summaries
4/20/2020	Jeanie Sleadd	3	work on response to msj
4/20/2020	Jeanie Sleadd	3	Response to MSJ
4/20/2020	Jeanie Sleadd	1.2	Conference call with Tim, Chris, Mark and Caroline re MSJ
4/21/2020	Jeanie Sleadd	1	Edit Connors Affidavit
4/21/2020	Jeanie Sleadd	0.1	Email re damages

4/21/2020	Jeanie Sleadd	10	work on response to msj
4/22/2020	Jeanie Sleadd	4	Work on MSJ
4/23/2020	Jeanie Sleadd	14	Work on MSJ
4/23/2020	Jeanie Sleadd	4	Work on MSJ
4/28/2020	Jeanie Sleadd	0.1	Emails with Chris and Mark re daubert briefs
5/4/2020	Jeanie Sleadd	3	Work on doc review and notes
5/5/2020	Jeanie Sleadd	2.5	Work on doc review and notes
5/6/2020	Jeanie Sleadd	4.5	Work on doc review and notes
5/7/2020	Jeanie Sleadd	6	Work on doc review and notes
5/11/2020	Jeanie Sleadd	5	Work on doc review and notes
5/11/2020	Jeanie Sleadd	0.1	Email to Tim and Mark with notes on docs reviewed
5/28/2020	Jeanie Sleadd	0.1	Email to Tim re: Alabama 3M docs
5/29/2020	Jeanie Sleadd	5	Review docs and send email with hot docs to Tim
5/30/2020	Jeanie Sleadd	0.1	Emails with Tim re depo
5/31/2020	Jeanie Sleadd	1	Review notes from Kevin
6/1/2020	Jeanie Sleadd	4	Review and pulling docs for depo
6/3/2020	Jeanie Sleadd	2	Review and pulling docs for depo
6/4/2020	Jeanie Sleadd	2	Review and pulling docs for depo
6/5/2020	Jeanie Sleadd	4	Magnusson depo and depo prep
6/15/2020	Jeanie Sleadd	3	Response to Motion to limit Grandjean
6/17/2020	Jeanie Sleadd	2.7	Work on response to doc. 239, motion to strike opinion of Barry Ryan
		347.40	

Date	Initial	Activity	Hours	Total:	829.1
10/15/2018	MRE	Internal communications with WLG, CBH and TD in preparation for conference call with other plaintiffs' counsel re MDL proceedings.	1		
1/18/2019	MRE	E-mail from TD re: public nuisance research project	0.1		
1/24/2019	MRE	Research into public nuisance class action claims	3.5		
1/26/2019	MRE	Reviewed Communication from Tim about meeting in advance of scheduled meeting with Shaun Crawford.	0.1		
2/14/2019	MRE	Review and summarization of Richard Purdy Depo	7.5		
2/27/2019	MRE	Communication with CBH and TD re vendors for documents	0.3		
2/27/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
2/27/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
2/27/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
2/27/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
2/27/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
2/27/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
2/27/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
2/28/2019	MRE	Phone call with Document Management Vendor	0.5		
2/28/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
2/28/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
2/28/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
2/28/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/4/2019	MRE	Conf call with CBH, TD and KH.	1		
3/4/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/4/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
3/4/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/4/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/4/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
3/4/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/4/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
3/14/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/14/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
3/15/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/15/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
3/15/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/18/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/20/2019	MRE	Meeting with Bryan Pate, CBH, TD and KH (KH by phone).	2		
3/21/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/21/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
3/21/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/26/2019	MRE	Communications with TD and CBH re defendants' document production; review of case law re battery claim.	0.8		
3/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
3/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
3/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
3/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
3/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
3/27/2019	MRE	Receipt and review of Amended Scheduling Order	0.4		
4/2/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
4/4/2019	MRE	Communications with TD and CBH re proposals from document vendors.	0.4		
4/4/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
4/4/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
4/4/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
4/4/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
4/4/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
4/4/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
4/4/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
4/4/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
4/4/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		
4/4/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1		
4/4/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2		

4/11/2019	MRE	Conf call with KH, CBH and TD discovery, potential experts, etc.	1
4/15/2019	MRE	Mtg with TD and CBH re documents, experts, etc.	1
4/23/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/24/2019	MRE	Mtg and follow-up communications with TD and ME re blood tests, CDC findings, 2016 Health Exposure Investigation (ATSDR), etc.	1.5
4/24/2019	MRE	Creation of map and data on number of WMEL customers forwarded by ME.	3.5
4/24/2019	MRE	Review communication from expert.	0.1
4/24/2019	MRE	Review communication from expert.	0.1
4/24/2019	MRE	Communication with expert.	0.2
4/25/2019	MRE	Review of affidavit of Don Simms	0.4
4/25/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/25/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/25/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/25/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/25/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/25/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/25/2019	MRE	Review communication from expert.	0.1
4/25/2019	MRE	Review communication from expert.	0.1
4/25/2019	MRE	Communication with expert.	0.2
4/25/2019	MRE	Communication with expert.	0.2
4/25/2019	MRE	Communication with expert.	0.2
4/26/2019	MRE	Communications with TD, CBH, KH, WLG re potential expert.	0.4
4/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/28/2019	MRE	Communications with KH, CBH, and TD re potential expert to address compounds found in soil at 3M.	0.4
4/29/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/29/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/29/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/30/2019	MRE	Call with potential expert; follow-up communications.	0.5
4/30/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/30/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/30/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/30/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/30/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
4/30/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/30/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/1/2019	MRE	Receipt and review of testing of certain soil samples.	0.5
5/1/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/1/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/1/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/1/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/1/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/1/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/1/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/1/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/2/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/2/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/2/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/2/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1

5/3/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/3/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/3/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/6/2019	MRE		
		Email communications with CBH, TD and KH, conf. call, re amendment to complaint, review of jury instructions on certain claims, considerations related to class reps	4
5/6/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/6/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/10/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/10/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/13/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/13/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/13/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/13/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/14/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/14/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/14/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/14/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/15/2019	MRE	Research into property tax records and property devaluation claims	3
5/15/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/15/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/15/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/15/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/15/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/15/2019	MRE	Review communication from expert.	0.1
5/16/2019	MRE	Review communication from expert.	0.1
5/16/2019	MRE	Communication with expert.	0.2
5/17/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/17/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/17/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/17/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/17/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/17/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/17/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/20/2019	MRE	Conf with TD and CBH re documents, discovery, etc.	1
5/20/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/20/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/20/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/20/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/20/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/20/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/20/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/20/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/20/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/20/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/20/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/20/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/20/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/20/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/20/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/20/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/20/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/20/2019	MRE	Review communication from expert.	0.1
5/20/2019	MRE	Communication with expert.	0.2
5/20/2019	MRE	Communication with expert.	0.2
5/21/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/21/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/21/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
5/21/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/21/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1

[illegible]

6/7/2019	MRE	Research into law regarding "dismissal with prejudice"	5
6/7/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
6/7/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/7/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
6/7/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/7/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
6/10/2019	MRE	Review of complaint, briefs, previously filed motion to dismiss and Court's order sent by CBH to KH, TD and me.	1
6/10/2019	MRE	Research into claim preclusion and communication on same with CBH.	3.5
6/10/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/10/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/10/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/10/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/10/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
6/10/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/11/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/11/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/12/2019	MRE		
		Review of law on medical monitoring; communications with CBH, TD and KH re this topic.	0.8
6/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/12/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/12/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/13/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/13/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/13/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/14/2019	MRE	Review of draft of brief opposing motion to dismiss. Communications with CBH, TD and KH.	2
6/14/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
6/17/2019	MRE	Review of 3M's Document Production	3.5
6/17/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/17/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/17/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/17/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
6/17/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/17/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/17/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/17/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/17/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/17/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/18/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/18/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/18/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/18/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/18/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/18/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/19/2019	MRE	Conf call with TD, KH and CBH re proposal from appraiser.	1
6/19/2019	MRE	Receipt and review of defendants' reply brief on motion to dismiss	0.4
6/19/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/19/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/19/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/19/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/20/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/20/2019	MRE	Reviewing E-mail from former Document Management Vendor	0.1
6/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2

6/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/27/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/28/2019	MRE	Research into the number of WMEL customers and related communications	2.5
6/28/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/28/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/28/2019	MRE	Review communication from expert.	0.1
6/28/2019	MRE	Communication with expert.	0.2
7/2/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/2/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/3/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/3/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/8/2019	MRE	Conf. with CBH and TD re experts, settlement demand.	0.7
7/8/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/8/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/8/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/11/2019	MRE	Conf. with CBH and TD to review results from site visit with expert.	1
7/11/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/11/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/11/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/11/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/11/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/11/2019	MRE	Review communication from expert.	0.1
7/11/2019	MRE	Review communication from expert.	0.1
7/11/2019	MRE	Communication with expert.	0.2
7/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/12/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/15/2019	MRE	Review of 3M documents; communications regarding the same	5.5
7/15/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/15/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/15/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/15/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/15/2019	MRE	Review communication from expert.	0.1
7/16/2019	MRE	Research into water usage of WMEL customers; review of WMEL documents	6.5
7/16/2019	MRE	Call with KH, TD and CBH re health advisories and scientific data.	1
7/16/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/16/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/16/2019	MRE	Review communication from expert.	0.1
7/16/2019	MRE	Review communication from expert.	0.1
7/16/2019	MRE	Review communication from expert.	0.1
7/16/2019	MRE	Communication with expert.	0.2
7/16/2019	MRE	Communication with expert.	0.2
7/16/2019	MRE	Communication with expert.	0.2
7/17/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/17/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/18/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/18/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/18/2019	MRE	Review communication from expert.	0.1

7/18/2019	MRE	Review communication from expert.	0.1
7/19/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/19/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/19/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/19/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/19/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/23/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/23/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/23/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/25/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/1/2019	MRE	Review communication from expert.	0.1
8/1/2019	MRE	Review communication from expert.	0.1
8/1/2019	MRE	Review communication from expert.	0.1
8/1/2019	MRE	Communication with expert.	0.2
8/1/2019	MRE	Communication with expert.	0.2
8/1/2019	MRE	Communication with expert.	0.2
8/5/2019	MRE	Review communication from expert.	0.1
8/6/2019	MRE	Review communication from expert.	0.1
8/6/2019	MRE	Review communication from expert.	0.1
8/6/2019	MRE	Review communication from expert.	0.1
8/6/2019	MRE	Review communication from expert.	0.1
8/6/2019	MRE	Communication with expert.	0.2
8/6/2019	MRE	Communication with expert.	0.2
8/6/2019	MRE	Communication with expert.	0.2
8/8/2019	MRE	Review communication from expert.	0.1
8/8/2019	MRE	Review communication from expert.	0.1
8/8/2019	MRE	Review communication from expert.	0.1
8/8/2019	MRE	Communication with expert.	0.2
8/8/2019	MRE	Communication with expert.	0.2
8/8/2019	MRE	Communication with expert.	0.2
8/9/2019	MRE	Tel. conf. with KH, CBH and TD re expert.	1
8/9/2019	MRE	Communication with expert.	0.2
8/9/2019	MRE	Communication with expert.	0.2
8/9/2019	MRE	Meeting with Expert in Birmingham Office, review of documents and doc review platform	8
8/10/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/13/2019	MRE	Review communication from expert.	0.1
8/14/2019	MRE	Review communication from expert.	0.1
8/14/2019	MRE	Review communication from expert.	0.1
8/14/2019	MRE	Communication with expert.	0.2
8/14/2019	MRE	Communication with expert.	0.2
8/16/2019	MRE	Communications re Daikin production with TD.	0.4
8/16/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/16/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
8/16/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/16/2019	MRE	Review communication from expert.	0.1
8/16/2019	MRE	Review communication from expert.	0.1
8/16/2019	MRE	Review communication from expert.	0.1
8/16/2019	MRE	Communication with expert.	0.2
8/16/2019	MRE	Communication with expert.	0.2
8/17/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
8/17/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/19/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
8/19/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/21/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/21/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
8/24/2019	MRE	Review communication from expert.	0.1
8/27/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
8/28/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/28/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/28/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/28/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/28/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1

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11/12/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
11/12/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/13/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/13/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
11/13/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/13/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
11/13/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/13/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
11/13/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
11/14/2019	MRE	Mtg. with TD, CBH, CH, JS and DD to address class cert. brief and discovery.	1
11/14/2019	MRE	Drafting class cert brief.	4.5
11/14/2019	MRE	Review communication from expert.	0.1
11/14/2019	MRE	Review communication from expert.	0.1
11/14/2019	MRE	Review communication from expert.	0.1
11/14/2019	MRE	Communication with expert.	0.2
11/14/2019	MRE	Communication with expert.	0.2
11/15/2019	MRE	Drafting class cert brief.	3.5
11/18/2019	MRE	Weekly Phone Call with Document Review Contractors	1
11/18/2019	MRE	Drafting class cert brief.	3.5
11/18/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/18/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
11/18/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
11/18/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
11/18/2019	MRE	Review communication from expert.	0.1
11/18/2019	MRE	Communication with expert.	0.2
11/18/2019	MRE	Meeting with Expert	1
11/19/2019	MRE	Drive to Decatur, inspection of 3M/Daikin Facilities from River	5
11/19/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/19/2019	MRE	Review communication from expert.	0.1
11/20/2019	MRE	Inspection of 3M/Daikin Facilities and drive back from Decatur.	9
11/20/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/20/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/20/2019	MRE	Review communication from expert.	0.1
11/21/2019	MRE	Drafting and editing class cert brief, communications concerning the same.	6
11/21/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/21/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/21/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
11/21/2019	MRE	Review communication from expert.	0.1
11/21/2019	MRE	Review communication from expert.	0.1
11/21/2019	MRE	Communication with expert.	0.2
11/25/2019	MRE	Weekly Phone Call with Document Review Contractors	1
11/25/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/26/2019	MRE	Drafting and editing class cert brief, communications concerning the same.	6
11/26/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
11/26/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
11/26/2019	MRE	Review communication from expert.	0.1
11/26/2019	MRE	Review communication from expert.	0.1
11/26/2019	MRE	Communication with expert.	0.2
11/27/2019	MRE	Drafting class cert brief, uploading and organizing exhibits, communications concerning the same.	4
11/29/2019	MRE	Drafting and editing class cert brief, communications concerning the same.	2
11/30/2019	MRE	Drafting and editing class cert brief, communications concerning the same.	3
12/1/2019	MRE	Drafting and editing class cert brief, communications concerning the same.	4.5
12/2/2019	MRE	Drafting and editing class cert brief, communications concerning the same.	8.5
12/2/2019	MRE	Review communication from expert.	0.1
12/2/2019	MRE	Review communication from expert.	0.1
12/2/2019	MRE	Review communication from expert.	0.1
12/2/2019	MRE	Communication with expert.	0.2
12/3/2019	MRE	Drafting, editing and upload of class cert brief.	14
12/3/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
12/3/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2

12/3/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
12/3/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/3/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
12/3/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/4/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/5/2019	MRE	Reviewing E-mail from Document Management Vendor and attachments regarding TASC	1.5
12/5/2019	MRE	Phone call with Document Management Vendor	0.7
12/5/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
12/5/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/9/2019	MRE	Review of expert reports; tel conf. with TD, CBH, WLG and KH	1.5
12/9/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/9/2019	MRE	Review communication from expert.	0.1
12/9/2019	MRE	Review communication from expert.	0.1
12/10/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/10/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/11/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
12/12/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/12/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
12/12/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
12/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
12/12/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/12/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
12/12/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/12/2019	MRE	Review communication from expert.	0.1
12/12/2019	MRE	Communication with expert.	0.2
12/12/2019	MRE	Communication with expert.	0.2
12/12/2019	MRE	Communication with expert.	0.2
12/13/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/16/2019	MRE	Review communication from expert.	0.1
12/16/2019	MRE	Review communication from expert.	0.1
12/17/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/17/2019	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
12/17/2019	MRE	Reviewing E-mail from Document Management Vendor	0.1
12/17/2019	MRE	Review communication from expert.	0.1
12/28/2019	MRE		
		Conf call with potential expert; follow-up communications with CBH, TD and KH	1.5
12/30/2019	MRE	Conf call with CBH, TD and KH; communication with defense counsel	1.4
1/1/2020	MRE	Review communication from expert.	0.1
1/1/2020	MRE	Communication with expert.	0.2
1/2/2020	MRE	Communication with expert.	0.2
1/4/2020	MRE	Review communication from expert.	0.1
1/4/2020	MRE	Communication with expert.	0.2
1/4/2020	MRE	Communication with expert.	0.2
1/5/2020	MRE	Review communication from expert.	0.1
1/5/2020	MRE	Review communication from expert.	0.1
1/5/2020	MRE	Communication with expert.	0.2
1/6/2020	MRE	Review of Defendants' response in opposition to class cert brief.	2.5
1/14/2020	MRE	Meetings to discuss reply brief; creation of skeleton response.	1.2
1/14/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/14/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
1/14/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/14/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/15/2020	MRE	Communications with outside counsel re: reply brief	0.4
1/15/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/15/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
1/15/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
1/16/2020	MRE	Drafting reply ISO class cert brief	10
1/17/2020	MRE	Drafting reply ISO class cert brief	8.5
1/17/2020	MRE	Review communication from expert.	0.1
1/19/2020	MRE	Incorporating drafts into reply ISO class cert brief; drafting of same	3.5

1/20/2020	MRE	Drafting and edity reply ISO class cert brief	9
1/21/2020	MRE		
1/23/2020	MRE	Drafting and edity reply ISO class cert brief; research at Cumberland Law Library for same	14
1/23/2020	MRE	E-mail to or concerning expert	0.2
1/23/2020	MRE	E-mail to or concerning expert	0.2
1/23/2020	MRE	Reviewing e-mail related to expert	0.1
1/23/2020	MRE	Pulling documents and putting them in dropbox for exper.	1
1/24/2020	MRE	Reviewing e-mail from expert	0.1
1/24/2020	MRE	E-mail to or concerning expert	0.2
1/24/2020	MRE	E-mail to or concerning expert	0.2
1/24/2020	MRE	E-mail to or concerning expert	0.2
1/24/2020	MRE	Reviewing e-mail related to expert	0.1
1/24/2020	MRE	E-mail to or concerning expert	0.2
1/24/2020	MRE	E-mail to or concerning expert	0.2
1/24/2020	MRE	Reviewing e-mail related to expert	0.1
1/24/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/24/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
1/24/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
1/24/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/24/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/24/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/24/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/25/2020	MRE	Reviewing e-mail related to expert	0.1
1/25/2020	MRE	Reviewing e-mail from expert	0.1
1/26/2020	MRE	Reviewing e-mail related to expert	0.1
1/26/2020	MRE	Reviewing e-mail from expert	0.1
1/26/2020	MRE	Reviewing e-mail related to expert	0.1
1/26/2020	MRE	Reviewing e-mail from expert	0.1
1/26/2020	MRE	Reviewing e-mail related to expert	0.1
1/27/2020	MRE	Reviewing e-mail from expert	0.1
1/27/2020	MRE	Reviewing e-mail related to expert	0.1
1/27/2020	MRE	Reviewing e-mail related to expert	0.1
1/27/2020	MRE	Reviewing e-mail from expert	0.1
1/27/2020	MRE	Reviewing e-mail related to expert	0.1
1/27/2020	MRE	E-mail to or concerning expert	0.2
1/27/2020	MRE	E-mail to or concerning expert	0.2
1/27/2020	MRE	Reviewing e-mail related to expert	0.1
1/27/2020	MRE	E-mail to or concerning expert	0.2
1/27/2020	MRE	Reviewing e-mail from expert	0.1
1/27/2020	MRE	Reviewing e-mail related to expert	0.1
1/27/2020	MRE	Reviewing e-mail related to expert	0.1
1/27/2020	MRE	Reviewing e-mail from expert	0.1
1/27/2020	MRE	Reviewing e-mail from expert	0.1
1/27/2020	MRE	Reviewing e-mail related to expert	0.1
1/27/2020	MRE	Reviewing e-mail related to expert	0.1
1/27/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
1/27/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/27/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/28/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
1/28/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/28/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
1/29/2020	MRE	Meeting with Chris, Tim, Caroline and Jeanie re: 30(b)(6) depositions, document review, utility depositions, and research projects.	1.5
1/29/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/29/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/29/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/29/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
1/29/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/29/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
1/29/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
1/29/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
1/29/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2

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2/6/2020	MRE	Communication with expert.	0.2
2/7/2020	MRE	Daikin Document Review	8
2/7/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/7/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/7/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/7/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/7/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/7/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/8/2020	MRE	Daikin Document Review	5
2/9/2020	MRE	Daikin Document Review	5
2/10/2020	MRE	Daikin Document Review	6
2/10/2020	MRE	Review communication from expert.	0.1
2/10/2020	MRE	Review communication from expert.	0.1
2/10/2020	MRE	Review communication from expert.	0.1
2/10/2020	MRE	Review communication from expert.	0.1
2/10/2020	MRE	Review communication from expert.	0.1
2/10/2020	MRE	Communication with expert.	0.2
2/10/2020	MRE	Communication with expert.	0.2
2/10/2020	MRE	Communication with expert.	0.2
2/10/2020	MRE	Communication with expert.	0.2
2/11/2020	MRE	Prep for and meeting with Tim, Caroline, Jeanie to discuss Daikin documents	2.5
2/14/2020	MRE	Review of Daikin's objections to 30(b)(6) notice	0.3
2/15/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/15/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/16/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/16/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/16/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/16/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/16/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/17/2020	MRE	Review of Daikin's "hot" documents pulled for the deposition	8.5
2/17/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/17/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/17/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/17/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/17/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/17/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/18/2020	MRE	Review of Daikin's "hot" documents pulled for the deposition; meeting with TD to discuss s	8.5
2/18/2020	MRE	Reviewing E-mail from Document Management Vendor and attachment	0.3
2/18/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/18/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/18/2020	MRE	Review communication from expert.	0.1
2/19/2020	MRE	Review of Daikin's "hot" documents pulled for the deposition; meeting with TD to discuss s	2.5
2/19/2020	MRE	Review of Daikin Privilege logs	4.5
2/19/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/19/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/19/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/19/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/19/2020	MRE	Communication with expert.	0.2
2/20/2020	MRE	Drafting and service of discovery deficiency letter to Daikin re: privilege logs	6.5
2/20/2020	MRE	Meeting with TD to discuss 30(b)(6) Deposition	1.5
2/20/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/20/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/20/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/20/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/20/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/20/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/20/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/20/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/20/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/20/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/20/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/20/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2

2/21/2020	MRE	Deposition of Daikin 30(b)(6) - Ralph Werling	9
2/24/2020	MRE	3M Document Review	4.5
2/25/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/25/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/25/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/25/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/25/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/25/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/25/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/25/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/25/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/25/2020	MRE	3M Document Review	7
2/26/2020	MRE	Reviewing e-mail related to expert	0.1
2/26/2020	MRE	Reviewing e-mail from expert	0.1
2/26/2020	MRE	Reviewing e-mail related to expert	0.1
2/26/2020	MRE	Reviewing e-mail from expert	0.1
2/26/2020	MRE	Reviewing e-mail related to expert	0.1
2/26/2020	MRE	Review communication from expert.	0.1
2/26/2020	MRE	Review communication from expert.	0.1
2/26/2020	MRE	3M Document Review	5
2/27/2020	MRE	3M Document Review	7
2/28/2020	MRE	Reviewing e-mail related to expert	0.1
2/28/2020	MRE	Reviewing e-mail from expert	0.1
2/28/2020	MRE	Reviewing e-mail related to expert	0.1
2/28/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/28/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/28/2020	MRE	3M Document Review	2
2/29/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/29/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
2/29/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
2/29/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/2/2020	MRE	Draft motion to compel 30(b)(6) witness from 3M	1
3/2/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
3/2/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
3/2/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/2/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/2/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
3/2/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/2/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
3/2/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/2/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
3/2/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/2/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
3/2/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/2/2020	MRE	3M Document Review	8
3/3/2020	MRE	Reviewing e-mail from expert	0.1
3/3/2020	MRE	E-mail to or concerning expert	0.2
3/3/2020	MRE	E-mail to or concerning expert	0.2
3/3/2020	MRE	Reviewing e-mail related to expert	0.1
3/3/2020	MRE	E-mail to or concerning expert	0.2
3/3/2020	MRE	Reviewing e-mail related to expert	0.1
3/3/2020	MRE	Reviewing e-mail from expert	0.1
3/3/2020	MRE	Reviewing e-mail related to expert	0.1
3/3/2020	MRE	E-mail to or concerning expert	0.2
3/3/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
3/3/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/3/2020	MRE	Review communication from expert.	0.1
3/3/2020	MRE	Communication with expert.	0.2
3/3/2020	MRE	3M Document Review	5
3/4/2020	MRE	3M Document Review	4
3/5/2020	MRE	Review communication from expert.	0.1
3/5/2020	MRE	Review communication from expert.	0.1

3/5/2020	MRE	Review communication from expert.	0.1
3/5/2020	MRE	Communication with expert.	0.2
3/5/2020	MRE	3M Document Review	4
3/6/2020	MRE	E-mail to or concerning expert	0.2
3/6/2020	MRE	Review communication from expert.	0.1
3/6/2020	MRE	Review communication from expert.	0.1
3/6/2020	MRE	Review communication from expert.	0.1
3/6/2020	MRE	3M Document Review	3
3/7/2020	MRE	Preparation for deposition of Larry Neal	6
3/8/2020	MRE	E-mail to or concerning expert	0.2
3/8/2020	MRE	Review communication from expert.	0.1
3/8/2020	MRE	Communication with expert.	0.2
3/8/2020	MRE	Preparation for deposition of Larry Neal	10
3/9/2020	MRE	Document Review Meeting with HGD Team	2.3
3/9/2020	MRE	E-mail to or concerning expert	0.2
3/9/2020	MRE	Reviewing e-mail from expert	0.1
3/9/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/9/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
3/9/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/9/2020	MRE	Communication with expert.	0.2
3/9/2020	MRE	Communication with expert.	0.2
3/9/2020	MRE	Preparation for deposition of Larry Neal	8
3/9/2020	MRE	3M Document Review	8
3/10/2020	MRE	Deposition of Larry Neal, expert witness for Daikin. Includes travel time to Atlanta and back	13
3/10/2020	MRE	3M Document Review	4
3/11/2020	MRE	3M Document Review	6.5
3/12/2020	MRE	Review communication from expert.	0.1
3/12/2020	MRE	3M Document Review	7
3/13/2020	MRE	3M Document Review	5.5
3/15/2020	MRE	Review of 3M's third privilege log and e-mail from CH.	3.5
3/16/2020	MRE	Reviewing e-mail from expert	0.1
3/16/2020	MRE	Reviewing e-mail related to expert	0.1
3/16/2020	MRE	3M Document Review	5
3/17/2020	MRE	Review communication from expert.	0.1
3/17/2020	MRE	Communication with expert.	0.2
3/17/2020	MRE	3M Document Review	7
3/18/2020	MRE	3M Document Review	7
3/19/2020	MRE	Review communication from expert.	0.1
3/19/2020	MRE	Review communication from expert.	0.1
3/19/2020	MRE	Communication with expert.	0.2
3/19/2020	MRE	3M Document Review	6
3/20/2020	MRE	Review communication from expert.	0.1
3/20/2020	MRE	Review communication from expert.	0.1
3/20/2020	MRE	Communication with expert.	0.2
3/20/2020	MRE	Communication with expert.	0.2
3/20/2020	MRE	Communication with expert.	0.2
3/20/2020	MRE	3M Document Review	1
3/23/2020	MRE	3M Document Review	5
3/24/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/24/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
3/24/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/24/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
3/24/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/24/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/24/2020	MRE	3M Document Review	6
3/25/2020	MRE	Review communication from expert.	0.1
3/25/2020	MRE	Review communication from expert.	0.1
3/25/2020	MRE	Communication with expert.	0.2
3/25/2020	MRE	Communication with expert.	0.2
3/25/2020	MRE	3M Document Review	2
3/26/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1

3/26/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/26/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
3/26/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/26/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
3/26/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
3/26/2020	MRE	3M Document Review	5
3/27/2020	MRE	3M Document Review	6
3/30/2020	MRE	3M Document Review	2
3/31/2020	MRE	3M Document Review	6
4/1/2020	MRE	Review of 3M's 4th Privilege log	1
4/1/2020	MRE	3M Document Review	8
4/2/2020	MRE	Review of 3M's 4th Privilege log	7.5
4/2/2020	MRE	3M Document Review	5.5
4/2/2020	MRE	Review 3M's MSJ	1.5
4/3/2020	MRE	3M Document Review	8
4/6/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
4/6/2020	MRE	3M Document Review	2.5
4/7/2020	MRE	3M Document Review	5
4/8/2020	MRE	3M Document Review	1.5
4/16/2020	MRE	Review communication from expert.	0.1
4/16/2020	MRE	Review communication from expert.	0.1
4/16/2020	MRE	Review communication from expert.	0.1
4/16/2020	MRE	Review communication from expert.	0.1
4/16/2020	MRE	Review communication from expert.	0.1
4/16/2020	MRE	Communication with expert.	0.2
4/16/2020	MRE	Communication with expert.	0.2
4/16/2020	MRE	Communication with expert.	0.2
4/16/2020	MRE	Communication with expert.	0.2
4/16/2020	MRE	MSJ Conference Call	1.5
4/19/2020	MRE	Drafting and editing of Response to 3M MSJ	3.5
4/20/2020	MRE	Review communication from expert.	0.1
4/20/2020	MRE	Review communication from expert.	0.1
4/20/2020	MRE	Review communication from expert.	0.1
4/20/2020	MRE	Review communication from expert.	0.1
4/20/2020	MRE	Communication with expert.	0.2
4/20/2020	MRE	Communication with expert.	0.2
4/20/2020	MRE	Communication with expert.	0.2
4/20/2020	MRE	Drafting and editing of Response to 3M MSJ	7
4/21/2020	MRE	Drafting and editing of Response to 3M MSJ	10
4/22/2020	MRE	Review communication from expert.	0.1
4/22/2020	MRE	Drafting and editing of Response to 3M MSJ	6
4/23/2020	MRE	Review communication from expert.	0.1
4/23/2020	MRE	Review communication from expert.	0.1
4/23/2020	MRE	Review communication from expert.	0.1
4/23/2020	MRE	Communication with expert.	0.2
4/23/2020	MRE	Communication with expert.	0.2
4/23/2020	MRE	Drafting, editing, and uploading of Response to 3M MSJ	14
5/12/2020	MRE	Review communication from expert.	0.1
5/15/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/15/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/15/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/19/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/19/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/19/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/20/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/20/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/20/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/20/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/20/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/20/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/20/2020	MRE	Review communication from expert.	0.1
5/20/2020	MRE	Review communication from expert.	0.1

5/20/2020	MRE	Communication with expert.	0.2
5/23/2020	MRE	Review communication from expert.	0.1
5/28/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
5/28/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
5/28/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/2/2020	MRE	Review of Daikin's MSJ and summarization of its arguments	2.5
6/5/2020	MRE	Review communication from expert.	0.1
6/5/2020	MRE	Review communication from expert.	0.1
6/5/2020	MRE	Communication with expert.	0.2
6/8/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/8/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/8/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/8/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/8/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/9/2020	MRE	Review communication from expert.	0.1
6/9/2020	MRE	Review communication from expert.	0.1
6/9/2020	MRE	Review communication from expert.	0.1
6/9/2020	MRE	Review communication from expert.	0.1
6/9/2020	MRE	Communication with expert.	0.2
6/11/2020	MRE	Review communication from expert.	0.1
6/13/2020	MRE	Reviewing e-mail related to expert	0.1
6/13/2020	MRE	Reviewing e-mail related to expert	0.1
6/15/2020	MRE	Communication with expert.	0.2
6/29/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/30/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/30/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/30/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/30/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/30/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/30/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/30/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/30/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
6/30/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
6/30/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/23/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/23/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/31/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
7/31/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
7/31/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
8/19/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/19/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
8/19/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
8/19/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
8/25/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
9/13/2020	MRE	Review of e-mail from CBH re: news articles related to litigation against 3M.	0.2
9/14/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
9/14/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
9/14/2020	MRE	Reviewing E-mail from Document Management Vendor	0.1
9/14/2020	MRE	Communication with Document Management Vendors re: document hosting and/or review	0.2
9/15/2020	MRE	Review e-mail from TD regarding settlement agreement and settlement agreement	1.5
9/15/2020	MRE	Review of e-mail forwarding financial expert's report and reviewing report	0.7
9/15/2020	MRE	Conference call discussing settlement agreement with TD and CBH.	1
9/21/2020	MRE	Internal conference call with CUH, CBH, JS, and TD discussing settlement agreement	0.8
9/22/2020	MRE	Internal call with CBH and TD re: settlement agreement	1
9/24/2020	MRE	Review of e-mail from TD regarding settlement agreement and reviewing updated draft of	1.5
9/27/2020	MRE	Draft Proposed notice plan and long form notice	5
9/28/2020	MRE	Draft Proposed notice plan and long form notice and communication of the same	3.5
10/12/2020	MRE	Review and edits of draft settlement agreement.	1.5
12/28/2020	MRE	Review of e-mail related to draft settlement agreement.	0.1
12/28/2020	MRE	Review and forwarding of material related to settlement agreement.	0.3
1/19/2021	MRE	Conference call discussing settlement agreement and motion for preliminary approval with	1
1/26/2021	MRE	Drafting of motion for preliminary approval	3
1/27/2021	MRE	Drafting of motion for preliminary approval	4
1/28/2021	MRE	Drafting of motion for preliminary approval	4

1/29/2021	MRE	Review of e-mail from TD regarding settlement agreement and reviewing updated draft of	1.5
1/29/2021	MRE	Review of e-mail from CBH re: damages report from defense expert.	0.4
1/29/2021	MRE	Drafting of motion for preliminary approval	3.5
1/31/2021	MRE	Drafting of motion for preliminary approval	3
2/1/2021	MRE	Drafting of motion for preliminary approval	2
2/2/2021	MRE	Drafting of motion for preliminary approval	3.5
2/2/2021	MRE	Conference call discussing settlement agreement and motion for preliminary approval with	1
2/3/2021	MRE	Drafting of motion for preliminary approval	3
2/5/2021	MRE	Conference call with defense counsel, TD, and CBH discussing settlement agreement	1
2/5/2021	MRE	Review of e-mail from damages expert.	0.5
2/6/2021	MRE	Editing of motion for preliminary approval	1.5
2/19/2021	MRE	Review of e-mail from defense counsel regarding amending language in the settlement agr	0.2
3/8/2021	MRE	Review of e-mail and attachment from TD regarding settlement figures	0.2
3/8/2021	MRE	Review of e-mails from CBH regarding settlement figures	0.3
3/16/2021	MRE	Review of e-mail from defense counsel regarding amending language in the settlement agr	0.2
3/18/2021	MRE	Review of e-mail and attachment from expert	0.2
3/18/2021	MRE	Communications with TD and CBH regarding language in the release	0.4
3/18/2021	MRE	Conference call discussing settlement agreement language	1
3/25/2021	MRE	Review of e-mail from defense counsel regarding amending language in the settlement agr	0.1
3/26/2021	MRE	Editing of motion for preliminary approval	1.5
3/27/2021	MRE	Conference call with TD and CBH regarding motion for preliminary approval	0.5
4/1/2021	MRE	Review of draft of settlement agreement from Defense counsel	1
4/1/2021	MRE	Conference call with TD and CBH regarding settlement agreement	0.7
4/5/2021	MRE	Review of Defense Counsel's edits to motion for preliminary approval	1.5
4/7/2021	MRE	Conference call with TD and CBH regarding motion for preliminary approval	1
4/7/2021	MRE	Editing of settlement agreement	1
4/9/2021	MRE	Editing of settlement agreement	1.5
4/11/2021	MRE	Communications regarding motion for preliminary approval	0.2
4/12/2021	MRE	Editing of motion for preliminary approval	1.5
4/12/2021	MRE	Communications regarding motion for preliminary approval	0.3
4/21/2021	MRE	Review of defense counsel edits to both motion for preliminary approval and settlement a	1
4/27/2021	MRE	Review of communications related to proposed edits for both motion for preliminary appr	0.4
5/11/2021	MRE	Review of communications related to proposed edits for both motion for preliminary appr	0.2
5/14/2021	MRE	Phone call with damages expert	0.3
5/21/2021	MRE	Review of and editing defence counsels' revision of motion for preliminary approval	0.8
6/11/2021	MRE	Conference call with TD and CBH regarding damages expert draft affidavit	1
6/21/2021	MRE	Communications regarding damages expert's draft affidavit.	0.2
6/25/2021	MRE	Communications regarding motion for preliminary approval	0.2
7/14/2021	MRE	Communications regarding settlement agreement.	0.4
8/3/2021	MRE	Conference call with damages expert	0.5
8/3/2021	MRE	Communications related to call with damages expert	0.3

Date	Initial	Activity	Hours
7/17/2018	TCD	Notice of Appearance by HGD	1.00
7/17/2018	TCD	Review of docket entries #139 Plaintiff's Opp. To Motion to Appoint Interim Counsel; #140 Plaintiff's Motion to Lift Stay; #141 Motion to Withdraw and Substitute Counsel; #142 3M Motion to Join Response of Daikin to Billings Filing; #143 3M Motion to Join Daikin Motion to Appt Interim Counsel. Conferences with WLG and CBH.	3.00
7/19/2018	TCD	Conferences with WLG and CBH re WMEL settlement with Daikin.	3.50
7/24/2018	TCD	Review of docket entries #144 Motion to Intervene; #145 Exhibits; #146 Motion to Strike; #147 Intervenor's Reply;	3.75
7/25/2018	TCD	Communications with WLG and CBH re recent filings, uniform order.	1.25
7/30/2018	TCD	Communications with CBH, WLG and JSS re our motion for extension of time. Review of motion (docket #149).	2.00
7/31/2018	TCD	Communications with WLG, CBH, JSS re Doc. #150 Daikin Response to Scruggs Motion to Intervene; #151 WMEL Response to Motion to Strike; #152 PI's Response in Opposition to Scruggs; #153 WMEL Response; #154 Lindsey Response; edits to our motions.	5.00
8/2/2018	TCD	Review of PI Motion, Doc #155 to Withdraw Doc #149	1.00
8/3/2018	TCD	Review of Billings plaintiffs motion in state court to lift stay; review of Doc. #156 Scruggs Response.	1.75
8/4/2018	TCD	Review of case law re successive class actions	2.00
8/15/2018	TCD	Review of notices of depositions from 3M to WMEL	0.50
8/30/2018	TCD	Review of Docket #157, Billings Reply, and internal communications regarding same.	1.25
9/27/2018	TCD	Review of CBH's summary of MDL petition by 3M and related documents.	2.50
9/27/2018	TCD	Review of article related to 3M settlement with Minnesota.	1.25
9/27/2018	TCD	Internal communications with HGD team re document review	0.50
9/28/2018	TCD	Conf with WLG and CBH re strategy in opposing MDL petition.	1.00
10/5/2018	TCD	Communications with WLG and CBH re AFFF and PFAS MDL applications. Email from Michael London regarding same.	1.00
10/8/2018	TCD	Conference call with counsel in MDL	0.50
10/11/2018	TCD	Receipt and review of MDL briefing schedule.	0.50
10/15/2018	TCD	Internal communications with WLG, CBH and ME in preparation for conference call with other plaintiffs' counsel re MDL proceedings.	1.50
10/16/2018	TCD	Conf call with other plaintiffs' counsel re MDL proceedings	0.50
10/16/2018	TCD	Follow-up communications re MDL proceedings	1.00

10/19/2018	TCD	Review and editing of JPML brief related to MDL motion for 3M cases.	2.25
10/30/2018	TCD	Review of similar lawsuits by Napoli firm in prep for Miami meeting on Nov. 1.	1.00
10/31/2018	TCD	Review of conference materials; travel to Miami for conference, mtgs. with attorneys.	5.00
11/1/2018	TCD	Miami conference; meetings with attorneys; return to Birmingham.	14.00
11/2/2018	TCD	Communications with WLG and CBH re Miami conference and case strategy.	3.00
11/9/2018	TCD	Communications with CBH and Katherine Van Marter re attendance at MDL hearing on Nov. 29.	1.00
11/16/2018	TCD	Review of oppositions filed re MDL. Internal communications regarding same.	1.00
11/19/2018	TCD	File review; communications with WLG and CBH re Nov. 20 status conf.	3.00
11/19/2018	TCD	Receipt and review of court orders, docket numbers 158,159,160,161,162 and 163.	1.00
11/20/2018	TCD	Attendance at status conference in Decatur. Meetings with counsel following same.	5.50
11/21/2018	TCD	Receipt and review of court orders, docket numbers 164 and 165.	0.50
11/26/2018	TCD	Communication with CBH re 3M docs in Summation	0.50
11/29/2018	TCD	Report from CBH re JPML hearing	0.50
12/3/2018	TCD	Receipt and review of quote from potential expert, Shaun Crawford.	0.50
12/7/2018	TCD	Receipt and review of order from JPML panel.	0.50
12/7/2018	TCD	Communications with CBH re potentially adding class representatives.	0.50
12/7/2018	TCD	Review of scientific information from C8 science panel, cancer study.	1.50
12/10/2018	TCD	Review of status report filed with court re ruling by JPML panel.	1.00
12/10/2018	TCD	Meeting with Decatur attorney, Kevin Teague	1.75
12/11/2018	TCD	Communications re considerations for class representatives; review of amended complaint in Owens case.	1.00
12/12/2018	TCD	Review of Billings Reply to 134 and 136 with exhibits;	1.50
12/28/2018	TCD	Review of joint discovery plan received from Jeff Friedman	1.50
1/3/2019	TCD	Receipt and review of information from Kevin Teague	1.00
1/8/2019	TCD	Exchange of draft joint discovery plan with Lee Patterson, Jeff Friedman, Gary Davis and Katherine Van Marter	0.50
1/14/2019	TCD	Communication with Friedman firm and Davis firm re draft proposed scheduling order	0.50
1/17/2019	TCD	Conf with Daikin counsel, Steve Casey	0.50
1/17/2019	TCD	Conf with WLG and CBH re Daikin.	1.00

1/18/2019	TCD	Evaluation of public nuisance claim; email to ME re research.	1.00
1/22/2019	TCD	Tel conf with Steve Casey, Bob Shaughnessy and Chris Yeilding re Daikin/settlement.	0.50
1/23/2019	TCD	Communications with WLG, CBH, ME re conf with Daikin counsel	1.00
1/23/2019	TCD	Communications with defense counsel and Friedman firm re proposed scheduling order	1.00
1/24/2019	TCD	Conf call with defense counsel and Lee Patterson re proposed scheduling order; follow-up email communications.	1.50
1/24/2019	TCD	Reviewing and summarizing deposition of Michelle Howell	3.00
1/26/2019	TCD	Communications with HGD team about meeting in advance of scheduled meeting with Shaun Crawford.	0.50
1/28/2019	TCD	Review of quote from Shaun Crawford.	0.50
1/31/2019	TCD	E-mail to HGD team re deposition summaries.	0.20
2/4/2019	TCD	Meeting with Kevin Hannon and CBH.	1.00
2/11/2019	TCD	Receipt and review of depo notices, Wirey and Magnusson.	0.20
2/21/2019	TCD	Review of EPA document re sludge at Decatur Utilities and local well water	1.00
2/22/2019	TCD	Receipt customer lists from Lee Patterson and review of same.	0.50
2/27/2019	TCD	Communication with CBH and ME re vendors for documents	0.30
2/28/2019	TCD	Review of 3M's Responses to Plaintiffs' First Request for Production	0.50
3/1/2019	TCD	Communications with CBH and Kevin Hannon re inspection of client properties.	1.00
3/2/2019	TCD	Summarizing deposition	3.50
3/4/2019	TCD	Conf call with CBH, ME and KH.	1.00
3/4/2019	TCD	Team communications re protective order	0.20
3/5/2019	TCD	Summarizing deposition	2.40
3/5/2019	TCD	Review of law on medical monitoring.	2.70
3/6/2019	TCD	Summarizing deposition	4.25
3/8/2019	TCD	Communications with CBH and KH re 30(b)6 and inspection of client properties.	0.40
3/11/2019	TCD	Dinner meeting with CBH and KH.	1.50
3/12/2019	TCD	Visit to properties of certain class members with KH.	5.50
3/12/2019	TCD	Conf call with Jeff Friedman, Lee Patterson, CBH and KH re document database.	0.70
3/13/2019	TCD	Communications with CBH and KH re WMEL motion to sever	0.40
3/15/2019	TCD	Meeting with Bryan Pate	1.50
3/19/2019	TCD	Call with Daikin counsel; email to WLG and CBH.	0.50
3/20/2019	TCD	Receipt and review of Neal declaration from Daikin counsel.	0.60

3/20/2019	TCD	Meeting with Bryan Pate, CBH, ME and KH (KH by phone).	2.00
3/21/2019	TCD	Review of article related to 3M settlement with Minnesota and forward to WLG and CBH.	2.50
3/22/2019	TCD	Communications with CBH and KH re status conf.	0.40
3/22/2019	TCD	Status conf with Court.	0.50
3/25/2019	TCD	Communications with defense counsel re selection of trial date, as requested by the Court; communications with Jeff Friedman and defense counsel re depositions of Wirey and Magnusson.	0.50
3/26/2019	TCD	Communications with ME and CBH re defendants' document production; review of case law re battery claim.	0.80
3/27/2019	TCD	Receipt and review of Amended Scheduling Order	0.40
4/4/2019	TCD	Communications with ME and CBH re proposals from document vendors.	0.40
4/11/2019	TCD	Conf call with KH, CBH and ME discovery, potential experts, etc.	1.00
4/15/2019	TCD	Mtg with ME and CBH re documents, experts, etc.	1.00
4/18/2019	TCD	Communication with defense counsel re scheduling depositions and new scheduling order.	0.20
4/24/2019	TCD	Mtg and follow-up communications with CBH and ME re blood tests, CDC findings, 2016 Health Exposure Investigation (ATSDR), etc.	1.50
4/24/2019	TCD	Review of map and data on number of WMEL customers forwarded by ME.	0.40
4/25/2019	TCD	Review of affidavit of Don Simms, provided by ME.	0.40
4/26/2019	TCD	Communications with ME, CBH, KH, WLG re potential expert.	0.40
4/26/2019	TCD	Call with potential expert	0.50
4/28/2019	TCD	Communications with KH, CBH, and ME re potential expert to address compounds found in soil at 3M.	0.40
4/30/2019	TCD	Call with potential expert; follow-up communications.	0.50
5/1/2019	TCD	Receipt and review of testing of certain soil samples.	0.50
5/4/2019	TCD	Conf call with CBH and KH re experts, amending complaint, soil sample results.	1.50
5/6/2019	TCD	Email communications with CBH, ME and KH, conf. call, re amendment to complaint, review of jury instructions on certain claims, considerations related to class reps	4.00
5/7/2019	TCD	Communications and consideration of erratum related to amended complaint.	1.50
5/15/2019	TCD	Communications with ME and CBH re property devaluation claim	0.40
5/15/2019	TCD	Review of article on PFBS travel time through soil	0.40
5/17/2019	TCD	Communication with defense counsel re 3M extension of time to respond to amended complaint.	0.20
5/20/2019	TCD	Conf with ME and CBH re documents, discovery, etc.	1.00

5/22/2019	TCD	Communications with ME and CBH re Daikin discovery, experts, ESI protocol.	0.40
5/28/2019	TCD	Communications with ME and CBH re local appraisers.	0.20
6/3/2019	TCD	Receipt and review of defendants' motion to dismiss; communications with WLG, CBH.	1.50
6/3/2019	TCD	Receipt and review of briefing schedule.	0.20
6/6/2019	TCD	Conf with CBH and ME re briefing on motion to dismiss.	1.50
6/7/2019	TCD	Communications with CBH and KH re mass appraiser.	0.40
6/7/2019	TCD	Review of law ME provided related to motion to dismiss.	1.00
6/10/2019	TCD	Review of complaint, briefs, previously filed motion to dismiss and Court's order sent by CBH to KH, ME and me.	1.75
6/10/2019	TCD	Received from CBH to KH and me 3M's latest 10Q. Reviewed pertinent section on PFCs litigation.	0.75
6/10/2019	TCD	Received from KH to CBH and me draft opposition on issue of medical monitoring. Review of same.	0.60
6/12/2019	TCD	Review of law on medical monitoring; communications with CBH, ME and KH re this topic.	0.80
6/13/2019	TCD	Review of draft sections for inclusion in brief opposing motion to dismiss; communications with ME, CBH and KH.	1.50
6/14/2019	TCD	Review of draft of brief opposing motion to dismiss. Communications with CBH, ME and KH.	2.00
6/17/2019	TCD	Receipt and review of 3M document from ME.	0.40
6/17/2019	TCD	Review of scheduling order and expert material	1.00
6/18/2019	TCD	Review of ESI proposal; conference with CBH	0.50
6/19/2019	TCD	Conf call with ME, KH and CBH re proposal from appraiser.	1.00
6/19/2019	TCD	Receipt and review of defendants' reply brief on motion to dismiss	0.40
6/21/2019	TCD	Mtg with CBH; mtg with counsel in related case.	2.50
6/26/2019	TCD	Review of news article from CBH on topic of 3M dumping more chemicals into Tennessee river.	0.40
6/27/2019	TCD	Mgt. with WLG and CBH in preparation for meeting with defense counsel.	1.00
6/28/2019	TCD	Review of pleadings and discovery in prep for meeting with defense counsel.	1.00
6/28/2019	TCD	CBH, WLG and me mtg. with 3M counsel.	1.00
6/28/2019	TCD	Communications with ME, copying WLG and CBH re number of WMEL customers.	0.70
6/28/2019	TCD	Mtg. with CBH and Bryan Pate	1.50
6/28/2019	TCD	Communications with KH and CBH re invoice from expert.	0.20
7/1/2019	TCD	Review of pleadings and discovery; tel. conf. with client.	2.00
7/8/2019	TCD	Conf. with CBH and ME re experts, settlement demand.	0.70
7/11/2019	TCD	Conf. with CBH and ME to review results from site visit with expert.	1.00
7/12/2019	TCD	Review of information provided by defense counsel re settlement, number of water meters. Forwarded to CBH and ME.	0.50

7/15/2019	TCD	Review of doc re PFBA from Mark	0.40
7/15/2019	TCD	Review of memo from ME re damages.	0.40
7/16/2019	TCD	Review of memo from KH re PFOA, medical surveillance, etc.	0.20
7/16/2019	TCD	Call with KH, ME and CBH re health advisories and scientific data.	1.00
7/16/2019	TCD	Call with Daikin counsel with CBH.	0.50
7/17/2019	TCD	Review of doc from ME re water usage	0.40
7/17/2019	TCD	Reveiw of memo from CBH re law on Economic Loss Doctrine	0.40
7/17/2019	TCD	Mtg. with defense counsel and CBH re settlement.	1.00
7/26/2019	TCD	Review of expert information from CBH.	0.40
7/29/2019	TCD	Mtg. with KH in San Diego.	1.00
8/6/2019	TCD	Tel. conf with counsel in related case about potential expert.	0.20
8/9/2019	TCD	Tel. conf. with KH, CBH and ME re expert.	1.00
8/13/2019	TCD	Call with lawyer representing City of Decatur and Morgan County.	0.50
8/14/2019	TCD	Tel. call with lawyer in related case; follow-up with CBH and WLG.	1.00
8/15/2019	TCD	Follow -up communication with lawyer for Dcatur and Morgan County.	0.40
8/16/2019	TCD	Communications re Daikin production with ME.	0.40
8/16/2019	TCD	Preparation and attendance at mtg. with lawyer in related case along with WLG and CBH.	1.50
8/28/2019	TCD	TCD, CBH and WLG: Preparation and attendance at mtg. with 3M counsel to discuss settlement.	2.00
8/28/2019	TCD	Review of memo from CBH, copying WLG and KH, re 3M's reliance	0.40
8/29/2019	TCD	Communications with CBH re experts and legal arguments.	0.50
8/30/2019	TCD	Communication with defense counsel re scheduling deadlines and mediation.	0.40
9/3/2019	TCD	Mtg. with CBH and ME re upcoming discovery.	1.00
9/4/2019	TCD	Mtg. with CBH, ME, CH, DD and JS re discovery tasks.	1.50
9/10/2019	TCD	Call with CBH and an expert.	1.00
9/11/2019	TCD	Review of documents related to Wirey in preparation for deposition.	2.50
9/12/2019	TCD	Communications with CBH in advance of meeting with counsel in related case.	1.00
9/14/2019	TCD	Review of Wirey documents in prep for deposition.	1.50
9/16/2019	TCD	TCD and CBH review of motion to extend pretrial deadlines and communication with defense counsel	0.50
9/18/2019	TCD	Communication with defense counsel re filing motion to extend deadlines.	0.20
9/18/2019	TCD	Review of testimony of Minnesota AG Swanson. Forward to CBH, ME and KH.	0.80

9/28/2019	TCD	Discussion and circulation of motion for emergency motion for telephonic hearing.	0.80
9/29/2019	TCD	Review of outline of claims memo from CH.	0.50
9/30/2019	TCD	Review of information from expert.	0.50
10/1/2019	TCD	Review of court opinion from Ohio. Communications re court's order extending deadlines.	0.50
10/5/2019	TCD	Communications with JS and CBH re nuisance claim.	0.40
10/14/2019	TCD	Conf. with defense counsel including submission of settlement demand.	0.40
10/14/2019	TCD	Tel. conf. with KH and CBH re discovery, experts, etc.	1.40
10/18/2019	TCD	Summarizing deposition	2.50
10/21/2019	TCD	Prep for and attendance at meeting with CBH, ME, CH, KH, DD	2.00
10/21/2019	TCD	Summarizing deposition	4.00
10/28/2019	TCD	Mtg. with CBH, ME, CH, DD and JS re discovery tasks.	1.00
10/29/2019	TCD	Review of deposition exhibits and email re same.	0.50
10/29/2019	TCD	Review of documentary re PFAS	1.25
10/30/2019	TCD	Mtg. with expert and CBH.	1.50
11/4/2019	TCD	Review of press release re 3M settlement with EPA; communication with ME and JS.	0.40
11/5/2019	TCD	Review of AG Swanson's testimony and exhibits; communication with CBH, KH ME and JS re same.	1.25
11/5/2019	TCD	Review of timeline/summary from JS	0.40
11/6/2019	TCD	Conf. call with KH and CH re client depo prep, site inspection, class cert motion, etc.	1.50
11/6/2019	TCD	Review of map showing client residences, landfills, defendant facilities, etc.	0.50
11/14/2019	TCD	Mtg. with ME, CBH, CH, JS and DD to address class cert. brief and discovery.	1.00
11/20/2019	TCD	Prep of clients for deposition; meeting with CBH and KH.	6.00
11/21/2019	TCD	Client depositions (Lindseys); client prep (Watkins);	10.00
11/22/2019	TCD	Client deposition (Watkins); mtg. with CBH, KH.	9.00
11/23/2019	TCD	Review of draft of factual section of class cert brief	1.00
11/25/2019	TCD	Mtg. with expert witness and CBH.	2.00
11/26/2019	TCD	Conf. with counsel re deposition of Dr. Richard Purdy.	0.50
11/26/2019	TCD	Review draft sections of class cert brief.	1.75
11/26/2019	TCD	Review of law on admissibility of deposition from related case.	1.00
11/27/2019	TCD	Review of declaration of Daikin expert. Communication with KH and CBH re same.	1.00
11/29/2019	TCD	Review and edit of draft section of class cert brief. Communication with ME re same.	5.00
11/30/2019	TCD	Review and editing of draft section of class cert brief and supporting exhibits. Communication with ME and CBH	4.50
11/30/2019	TCD	Review of Don Simms declaration for inclusion in brief.	1.20

12/1/2019	TCD	Review of clients' depositions for inclusion in class cert brief; editing of brief.	3.40
12/2/2019	TCD	Excerpting depositions for inclusion in brief; review/edits to	7.00
12/3/2019	TCD	Drafting affidavit for submission with brief. Multiple reviews/edits of brief; Mtgs. with team.	9.00
12/9/2019	TCD	Review of expert reports; tel conf. with ME, CBH, WLG and KH	1.50
12/10/2019	TCD	Mtg. with counsel in related case, along with CBH and WLG	1.50
12/12/2019	TCD	Email with deposition notice to expert witness.	0.50
12/13/2019	TCD	Conf. call with KH and CH	1.00
12/15/2019	TCD	Communications with KH and CBH re experts; scheduling depositions; review of scientific article.	0.80
12/16/2019	TCD	Mtg. with expert with CBH; productions to defense counsel.	3.50
12/17/2019	TCD	Conf. call with expert with CBH and KH.	1.00
12/18/2019	TCD	Prep for an attendance at deposition of Plaintiffs' expert witness.	6.00
12/20/2019	TCD	Meeting with CBH re damages expert; communication with defense counsel.	0.70
12/23/2019	TCD	Communication with Venetia Watkins re deposition; communications with CBH and KH re expert witness.	0.80
12/24/2019	TCD	Communication with KH re potential expert	0.40
12/26/2019	TCD	Communication with potential expert.	0.20
12/28/2019	TCD	Conf call with potential expert; follow-up communications with CBH, ME and KH	1.50
12/30/2019	TCD	Conf call with CBH, ME and KH; communication with defense counsel	1.40
12/31/2019	TCD	Conf. call with CBH and defense counsel	0.50
12/31/2019	TCD	Outline of prep for Venetia Watkins	2.00
12/31/2019	TCD	Conf. call with potential expert	1.00
11.30/2019	TCD	Review of Dr. Purdy deposition for inclusion in brief.	2.70
1/2/2020	TCD	Travel to Atlanta for meeting with expert.	2.50
1/2/2020	TCD	Mtg. with experts Ryan and Detwiler	5.00
1/3/2020	TCD	Depo. Of expert, Detwiler	5.25
1/3/2020	TCD	Travel to B'ham	2.50
1/4/2020	TCD	Conf. with ME re expert Connors	0.30
1/5/2020	TCD	Work on expert reports of Pate, Connors, Summerford; conf with ME, CBH, KH	4.50
1/6/2020	TCD	Work on expert reports of Pate, Connors, and Summerford, Grandjean	6.00
1/6/2020	TCD	Mtg with ME re Simms affidavit	0.50
1/6/2020	TCD	Conf. with expert, Connors	0.50
1/6/2020	TCD	Work on agreements with defense counsel	1.00
1/6/2020	TCD	Conf. with KH	0.60

1/6/2020	TCD	Review defendants response to motion for class cert; motion/intervene by Billings	0.70
1/7/2020	TCD	Compiling documents for expert, Pardue.	0.50
1/7/2020	TCD	Review numerous emails to/from co-counsel.	1.00
1/8/2020	TCD	Communication with co-counsel re fact witnesses listed by def.; comm. w/ defense counsel re us disclosing add'l expert.	1.20
1/9/2020	TCD	Review of emails re WMEL and spoke utilities	0.40
1/9/2020	TCD	Travel to Atlanta for depo prep of expert, Ryan.	2.50
1/9/2020	TCD	Depo prep of Ryan.	4.00
1/10/2020	TCD	Drafting email to defense counsel	0.20
1/13/2020	TCD	Review of law and articles from CBH on Economic Loss Doctrine	1.40
1/14/2020	TCD	Review of case law re judicial estoppel; email re the same	1.00
1/14/2020	TCD	Review of case law and file re class rep issues	0.50
1/15/2020	TCD	Review of Michigan suit; law re damages.	1.50
1/15/2020	TCD	Review of Economic Loss Doctrine	2.00
1/15/2020	TCD	Mee with Chris re prep for expert, Summerford.	2.00
1/15/2020	TCD	Conf. call with Chris King; follow conf. with CBH	1.00
1/16/2020	TCD	Review of article re Oakdale, Mn. 3M PFAS	1.00
1/16/2020	TCD	Review of emails from CBH re ratepayer info; review Sims affidavit	0.70
1/17/2020	TCD	Review of emails from ME and CBH re class definition, defense arguments	0.50
1/18/2020	TCD	Review of case law re Economic Loss Doctrine	1.60
1/20/2020	TCD	Travel to Atlanta for expert, Ryan, deposition	2.50
1/20/2020	TCD	Review of drafts of Reply brief	2.70
1/21/2020	TCD	Deposition of expert, Ryan	7.50
1/23/2020	TCD	Conf. call with expert, Pardue, with CBH	1.00
1/24/2020	TCD	Mtg. with ME re documents for expert, Pardue. Email to Pardue with docs.	0.80
1/24/2020	TCD	Review of email and subpoenas re spoke utilities.	0.30
1/24/2020	TCD	Review of docs re Daikin purchase agreement	1.00
1/26/2020	TCD	Review of Weston docs	2.00
1/27/2020	TCD	Internal mtg with team	1.00
1/27/2020	TCD	Review draft of expert report, Pardue; correspondence with Pardue	1.60
1/28/2020	TCD	Conf. call with CBH; review email from CBH re WMEL; conf. with defense counsel re 30(b)6 topics	1.60
1/29/2020	TCD	Prep for and attendance at team mtg.	1.50
1/29/2020	TCD	Review of articles re grand jury subpoena to 3M	1.50
2/1/2020	TCD	Email to/from KH re medical monitoring.	0.50
2/1/2020	TCD	Email to defense counsel supplementing items considered by expert, Granjean	0.20
2/1/2020	TCD	Review Billings filing re class certification.	2.00
2/2/2020	TCD	Daikin doc review	5.00

2/3/2020	TCD	Email from KH re Grandjean depo	0.10
2/4/2020	TCD	Daikin doc review	3.75
2/5/2020	TCD	Review of Daikin 30b6 notice and second RFP responses	2.50
2/6/2020	TCD	T/c with KH re Daikin docs	0.40
2/6/2020	TCD	Daikin doc review	3.75
2/7/2020	TCD	Mtg. with potential settlement admin.	1.00
2/8/2020	TCD	T/c and follow up email with defense counsel re def expert depo	1.00
2/9/2020	TCD	Review of articles re PFAS in drinking water	2.25
2/11/2020	TCD	Email from KH re Greenberg depo	0.10
2/11/2020	TCD	Review of depo notices for defense experts	0.50
2/11/2020	TCD	Mtg. with ME, CH, JS re Daikin docs.	2.50
2/13/2020	TCD	Daikin doc review	5.25
2/14/2020	TCD	Review brief in support of Mtn to Dismiss by 3M	1.50
2/16/2020	TCD	Daikin doc review	3.25
2/17/2020	TCD	Prep of correspondence to send to counsel for both defendants	0.50
2/17/2020	TCD	Emails to defense counsel, KH and CBH re Britt depo.	0.50
2/17/2020	TCD	Daikin doc review	3.00
2/18/2020	TCD	Daikin doc review and depo prep for Daikin 30b6 depo	6.00
2/19/2020	TCD	Daikin doc review and depo prep for Daikin 30b6 depo	5.50
2/19/2020	TCD	Review of Daikin answer to third amended complaint	1.00
2/19/2020	TCD	Review of correspondence from counsel for WMEL	0.50
2/20/2020	TCD	Mtg. with ME to prep for Daikin;	2.00
2/20/2020	TCD	T/c with expert, Pardue	0.50
2/20/2020	TCD	Depo prep for Daikin 30b6 depo	7.00
2/20/2020	TCD	Call with Counsel for spoke utility	0.50
2/20/2020	TCD	Review of correspondence b/t CBH and counsel for WMEL	0.20
2/21/2020	TCD	Review of rules and case law re instructing 30b6 witness	0.30
2/21/2020	TCD	Depo prep for Daikin 30b6	2.00
2/21/2020	TCD	Daikin 30b6 deposition	7.00
2/23/2020	TCD	Drafting timeline of 3M and Daikin activities	2.00
2/24/2020	TCD	Emails with CBH and review of report of defense expert re filtration	0.40
2/24/2020	TCD	Strategy mtg with ME	1.50
2/24/2020	TCD	Review of depo notices of defense experts	0.20
2/25/2020	TCD	Review of emails and depo notice of WMEL	0.30
2/25/2020	TCD	Emails and review of data related to report of defense expert	0.20
2/25/2020	TCD	Review of correspondence with counsel for WMEL	0.10
2/25/2020	TCD	Review of correspondence to 3M counsel re 3M 30b6 depo	0.10
2/26/2020	TCD	Email to CBH re WMEL info	0.20
2/26/2020	TCD	Email to CBH and KH scheduling expert depositions	0.20
2/26/2020	TCD	Email to our experts re dates for depo prep and depo	0.30
2/27/2020	TCD	Email from KH re Frankel depo	0.10

2/27/2020	TCD	Review of article on Minnesota clean-up under 3M settlement	0.20
2/27/2020	TCD	Mtg. with CH and KH re legal research issues	0.60
2/28/2020	TCD	Email with CBH and KH re depo dates for our experts	0.20
2/28/2020	TCD	Email to Daikin counsel re depo schedule of its experts	0.20
3/2/2020	TCD	Team meeting to discuss discovery and case in general	1.50
3/2/2020	TCD	Email from KH re docs, 3M toxicity research, exhibit list, etc.	0.30
3/3/2020	TCD	Review of 3M docs and incorporation into timeline	2.00
3/3/2020	TCD	Communication with expert Pardue re depo prep	0.20
3/3/2020	TCD	Receipt and review of Daikin expert reports	0.04
3/4/2020	TCD	3M doc review	2.00
3/4/2020	TCD	Receipt and review of 3M objections to 30b6 depo notice	0.30
3/4/2020	TCD	Review of email from 3M defense counsel re discovery requests	0.30
3/4/2020	TCD	T/c with counsel re settlement potential	0.50
3/7/2020	TCD	Communication with Daikin counsel and KH re date for expert, Britt, depo	0.20
3/7/2020	TCD	Email from KH re emissions report, Daikin discovery	0.10
3/10/2020	TCD	Communication with counsel re settlement potential	0.50
3/10/2020	TCD	3M doc review	2.00
3/11/2020	TCD	Email from 3M counsel rescheduling 30b6 depo	0.10
3/13/2020	TCD	3M doc review	2.00
3/13/2020	TCD	Email from KH re EPA rule	0.10
3/14/2020	TCD	3M doc review	2.50
3/15/2020	TCD	Emails with defense counsel and internally related to Covid impact on depo schedule	0.40
3/15/2020	TCD	Email from KH re draft of brief, doc review	0.20
3/16/2020	TCD	3M depo and doc review; prep for hearing on March 20	4.00
3/16/2020	TCD	Conference with ME re status of 3M docs and review	0.40
3/17/2020	TCD	Prep for and attendance at team meeting	2.00
3/17/2020	TCD	Team Meeting	1.00
3/18/2020	TCD	Prep for and conf call with expert, Pate. ME and CBH attend.	1.50
3/19/2020	TCD	Conf with CBH re hearing on 3/20 and settlement issues	1.00
3/19/2020	TCD	Email from Daikin defense counsel and follow-up communication re depo of Daikin rep on topic of health effects	0.40
3/19/2020	TCD	Email from Court rescheduling hearing for March 27.	0.10
3/19/2020	TCD	Draft email to WLG and CBH re settlement potential; follow-up communications	0.30
3/20/2020	TCD	Prep for and call with expert, Connors	1.50
3/23/2020	TCD	Drafting email to 3M defense counsel addressing several discovery items	0.40
3/23/2020	TCD	3M doc and depo review	2.00
3/23/2020	TCD	Discussion with WLG and CBH re potential settlement structure	0.60

3/24/2020	TCD	Call with CBH re upcoming hearing	0.70
3/24/2020	TCD	Review Purdy Deposition	3.00
3/24/2020	TCD	Call with counsel re potential settlement; follow-up email to WLG and CBH	0.60
3/25/2020	TCD	Call with ME and CBH re damages	1.00
3/25/2020	TCD	Preparatory discussion and then drafting settlement proposal to defense counsel	1.50
3/26/2020	TCD	Receipt, review and internal discussion of Order from Court.	2.70
3/26/2020	TCD	Email from CBH related to hearing 3/27	0.40
3/26/2020	TCD	Review of email from Court	0.20
3/27/2020	TCD	Communications with defense counsel re hearing set for 3/27.	0.70
3/27/2020	TCD	Drafting email to Court re agreement reached by counsel.	0.20
3/30/2020	TCD	Review of Werling deposition and errata; follow-up email	1.50
3/30/2020	TCD	3M doc and depo review	1.50
4/2/2020	TCD	Receipt and review of 3M motion for summary judgment.	1.50
4/3/2020	TCD	Receipt and review of Court's briefing schedule; follow-up internal email.	0.30
4/3/2020	TCD	Review of Motion to Extend Time to File Response; follow-up email.	0.30
4/6/2020	TCD	Receipt and review of email from defense counsel re WMEL data	0.20
4/6/2020	TCD	Conf call with CBH and ME re deposition schedule and response to s.j.	1.20
4/6/2020	TCD	Correspondence with expert, Pardue	0.20
4/7/2020	TCD	3M doc and depo review	3.50
4/7/2020	TCD	Receipt and review of 3M expert report, Mark Johns.	1.30
4/9/2020	TCD	Prep and draft email to counsel re motion to extend certain pretrial deadlines	0.80
4/9/2020	TCD	Prep for and attend conf call with ME and CBH re discover items and SJ response	1.00
4/10/2020	TCD	Review of revised 30b6 notice of 3M; follow up emails to CBH, KH and ME	0.50
4/11/2020	TCD	Emails re serving 30b6, issues re Billings suit	0.20
4/11/2020	TCD	3M doc and depo review	2.00
4/15/2020	TCD	Communication internally re deposition schedule to defendants; email to defense counsel	0.30
4/15/2020	TCD	3M doc review	3.00
4/15/2020	TCD	Discussion internally and then email 3M counsel re schedule for 30b6 and for responding SJ motion	1.00
4/15/2020	TCD	Preparation of Rule 56(f) affidavit	2.00
4/16/2020	TCD	Edits to Rule 56 affidavit, with input from ME an CBH	1.00
4/16/2020	TCD	Email to ME and CBH re 56(d) motion for extension of time; 56f affidavit	0.50
4/17/2020	TCD	Final edits to 56(d) motion and exhibits.	2.50

4/18/2020	TCD	Review of expert reports and depositions for hearing related to health effects	2.00
4/19/2020	TCD	3M doc and depo review	4.00
4/19/2020	TCD	Review of case law for cited in defendant's s.j. brief	2.50
4/20/2020	TCD	Review of 3M testimony and draft of part of response to 3M motion for s.j.	5.00
4/20/2020	TCD	Review of testimony of class reps	1.00
4/21/2020	TCD	Work on opposition to 3M motion for s.j.	6.00
4/22/2020	TCD	Work on opposition to 3M motion for s.j.	8.00
4/23/2020	TCD	Team call re opposition to 3M motion for s.j.	1.00
4/24/2020	TCD	Work on opposition to 3M motion for s.j.	12.00
4/25/2020	TCD	Review of our motion for discovery; follow up emails	2.00
4/26/2020	TCD	Emails re WMEL data	0.60
4/27/2020	TCD	Document review for general knowledge and prep for 3M 30(b)6	3.00
4/28/2020	TCD	Document review for general knowledge and prep for 3M 30(b)6	2.00
4/29/2020	TCD	Document review for general knowledge and prep for 3M 30(b)6	2.00
4/30/2020	TCD	Document review for general knowledge and prep for 3M 30(b)6	2.00
5/1/2020	TCD	Document review for general knowledge and prep for 3M 30(b)6	2.00
5/2/2020	TCD	Document review for general knowledge and prep for 3M 30(b)6	2.00
5/3/2020	TCD	Document review for general knowledge and prep for 3M 30(b)6	2.00
5/4/2020	TCD	conf with CBH re 3M's reply brief	0.50
5/4/2020	TCD	Doc review	2.00
5/4/2020	TCD	review SJ briefs	1.00
5/5/2020	TCD	3.0 - doc and depo review prepping for 30b6	4.50
5/5/2020	TCD	Review brief	1.00
5/5/2020	TCD	Conference with Lew	0.50
5/6/2020	TCD	doc review for depo	7.50
5/6/2020	TCD	Conf with Chris re class makeup	0.50
5/6/2020	TCD	Conf with Chris and Lew re settlement value, brief	1.00
5/7/2020	TCD	Doc review for 3M 30b6 and case in general	6.75
5/7/2020	TCD	Call with Chris King	0.25
5/8/2020	TCD	Doc and depo review for 3M 30b6 and case in general	7.00
5/9/2020	TCD	Conf with Chris Hood	0.50
5/9/2020	TCD	Conf with Chris King	0.50
5/9/2020	TCD	Doc and depo review for 3M 30b6 and case in general	9.00
5/17/2020	TCD	Review of data for settlement conference	2.00
5/18/2020	TCD	Review of data for settlement conference including recent briefing	2.00
5/19/2020	TCD	Review briefing. Conference with Chris and Lew re settlement.	3.00

5/20/2020	TCD	Conference with Chris King re settlement; Prep for 30b6	2.00
5/21/2020	TCD	Prep for 3M 30b6; review of docs and depositions	6.00
5/22/2020	TCD	Prep for 3M 30b6; review of docs and depositions	3.00
5/23/2020	TCD	Prep for 3M 30b6; review of docs and depositions	2.50
5/24/2020	TCD	Prep for 3M 30b6; review of docs and depositions	3.50
5/25/2020	TCD	Prep for 3M 30b6; review of docs and depositions	2.50
5/26/2020	TCD	Prep for 3M 30b6; review of docs and depositions, meeting with Mark.	6.00
5/27/2020	TCD	Review of docs and depositions	6.00
5/28/2020	TCD	Review of docs and depositons	6.00
5/29/2020	TCD	Review of docs and depositons	7.00
5/30/2020	TCD	Review of docs and depositons	7.00
5/31/2020	TCD	Review of docs and depositons	6.00
6/1/2020	TCD	Review of docs and depositons; depo prep; settlement conf.	9.00
6/2/2020	TCD	Review of docs and depositons; depo prep for Magnusson	4.50
6/3/2020	TCD	Review of docs and depositons; depo prep for Magnusson	5.75
6/4/2020	TCD	Depo prep for Magnusson; settlement conf with Chris King	8.00
6/5/2020	TCD	Depo of Magnusson; settlement discussions internally	6.00
6/6/2020	TCD	Depo prep for 3M 30b6; settlement discussion internally	5.50
6/7/2020	TCD	Depo prep for 3M 30b6	6.00
6/8/2020	TCD	Review of docs and depositions; depo prep for 3M 30b6; settlement conference	12.00
6/9/2020	TCD	Review of docs and depositions; settlement discussion internally; depo prep	3.00
6/10/2020	TCD	Review of pending motions; review of docs and deposition for depo prep 30b6	6.00
6/11/2020	TCD	Review of deposition testimony	4.00
6/12/2020	TCD	Review of expert reports; conference calls internally	4.50
6/13/2020	TCD	Review of expert reports; review of case law; review of Purdy deposition	6.00
6/14/2020	TCD	Review of Purdy depo and docs;	3.50
6/15/2020	TCD	Review of docs; prep for 30b6	7.50
6/16/2020	TCD	Review of docs; prep for 30b6	4.00
6/17/2020	TCD	Settlement discussion with 3M and internally; conference with experts	5.00
6/18/2020	TCD	Summarizing documents	4.50
6/19/2020	TCD	Summarizing documents	3.00
6/20/2020	TCD	Summarizing documents	2.75
6/21/2020	TCD	Summarizing documents	2.25
6/22/2020	TCD	Correspondence with mediator; Summarizing documents.	1.50
6/23/2020	TCD	Doc review	3.50
6/24/2020	TCD	Prepping for mediation; prepping for plaintiffs' experts	6.00
6/25/2020	TCD	Reviewed summary judgment motion and class briefs.	6.00
6/26/2020	TCD	Doc review; depo prep; settlement discussions with opposing counsel, internal.	4.00

6/27/2020	TCD	Settlement discussions with opposing counsel and internal.	0.50
6/29/2020	TCD	Settlement discussion with opposing counsel; conf. with CBH and WLG; correspondence re notifying court.	3.00
9/10/2020	TCD	Email internally and with Lindsey Gill	0.50
10/1/2020	TCD	Conference call with defense counsel re settlement agreement	1.00
11/13/2020	TCD	Conference call with Chris and defense counsel re draft settlement agreement.(Review emails from November and previous months.)	1.00
12/1/2020	TCD	Phone call giving status report to Lanette Lindsey	0.25
12/1/2020	TCD	Review of draft settlement agreement and email to Chris and Kevin re same.	2.00
12/2/2020	TCD	Conference call with Chris and Kevin to review draft settlement agreement.	1.00
1/4/2021	TCD	Reviewing settlement agreement. Conf. with counsel and court.	1.50
1/5/2021	TCD	Reviewing settlement agreement.	1.75
1/7/2021	TCD	Reviewing settlement agreement.	1.00
1/8/2021	TCD	Reviewing settlement agreement, conf. with Chris Hood, tel conf with def. cons.	1.50
2/4/2021	TCD	Conference with Chris and Mark re settlement agreement	1.00
2/5/2021	TCD	Conference call with defense counsel re settlement agreement	1.00
2/10/2021	TCD	Conference with Lindsay Gill and Chris re number of class members	1.00
3/3/2021	TCD	Conf. with Leon Ashford, Bruce McKee and Chris re PFAS definition, release, etc.	0.50
3/4/2021	TCD	Conf. with Lindsay Gill, Snow Wallace and Chris	0.50
3/5/2021	TCD	Conf. with Bryan Pate and Chris re R/O system	0.50
3/6/2021 - 11/30/2021	TCD	Work on settlement agreement, Motion for Preliminary Approval; prep for and attendance at hearing on Motion for Preliminary Approval; team meetings; calls with defense counsel.	40.00

TOTAL HOURS 897.24

Date	Initial	Activity	Hours	
10/19/18	Chris Hood	Engaged to represent clients, discussed matter with partners, reviewed pending motions in the case and in the proposed MDL, researched and prepared responses, including on issues of substitution, intervention, interim class counsel. <i>NOTE: hours for principal work are summed for intervals of time and stated on the date the interval ended.</i>	34	
11/1/18	Chris Hood	Reviewed similar PFAS lawsuits to prepare to conference out of town with other plaintiffs' counsel in cases, and attended the conference, and discussed MDL issues there among other topics	24	
1/8/19	Chris Hood	Investigated experts to test client properties, reviewed additional docket items, communicated with area attorney about additional clients, researched current science on PFAS exposure	31.7	
1/31/19	Chris Hood	communicated with defense counsel, plaintiff's co counsel, and HGD attorneys on matters of procedure and schedule	17	
3/4/19	Chris Hood	Reviewed depo docs, discussed doc review options, reviewed discovery, and conferenced with HGD attys and with K Hannon	28.5	
4/4/19	Chris Hood	Communications on client properties, visits and possible testing at same, and met with co counsel and attorney team members on claims and science	16	
5/7/19	Chris Hood	Planned for and worked on amended complaint via legal research and review of expert testing, medical tests, all other available data, and conferenced with co counsel on all such subjects; prepared and filed errata	46	
6/20/19	Chris Hood	Discussed and investigated additional experts, read and researched MTD and answers to amd complaint, researched and helped prepare response opposing MTD, and reviewed reply briefing on same	39	
10/1/19	Chris Hood	Discussed and participated in meetings with defense counsel, communicated with co counsel on an array of discovery subjects and procedural matters, discussed site visit results, investigated distribution systems of utilities in preparation of discovery to be served on them	52	
12/3/19	Chris Hood	Led discussions on assignments for class certification briefing, conducted investigation into factual basis for same, including by review of existing production, assisting in prep of clients for deposition, assisting in other depo prep and attending depositions, researched the law, and drafted sections of the motion and edited sections prepared by others	121.5	
1/22/20	Chris Hood	reviewed responsive briefing by defense and by 3rd parties, helped prepare and file reply in support of class certification motion, with erratum	60	
3/6/20	Chris Hood	Motions practice and notices regarding 3rd party opposition and intervention and discovery matters involving utility	27.5	
5/4/20	Chris Hood	Heavily engaged in all aspects of summary judgment motion practice and related matters of untaken depositions (experts and fact witnesses), helped draft opposition to MSJ and reviewed reply for MSJ	84	
6/18/20	Chris Hood	Continued daily engagement in MSJ motions practice, including Dai MSJ, and related expert and fact witness scheduling, with filings with Court on those issues, and took deposition of utility fact witness	89	
8/1/20	Chris Hood	Participated in numerous discussions with co counsel and defense counsel on reaching an agreement in principle, reached agreement and noticed the Court to obtain a stay, conducting repeated review and inquiry into evidence for identifying class members based on utility records, in conjunction with damages expert, and discussed with that expert distribution plan and bases for it.	142	
11/1/21	Chris Hood	Continued work with damages experts. Reviewed and counterproposed series of settlement agreements, discussed same in email and by phone with co counsel and defense counsel, drafted and redlined settlement documents, including notices for submission with memo and motion for preliminary approval, completed same, and engaged settlement administrator to discharge notice and administration	175	
			987.2	

Date	Initial	Activity	Hours	
10/21/18	WLGjr	Engaged to represent clients, discussed matter with partners, reviewed pending motions in the case and in the proposed MDL, and discussed substitution, 3rd party intervention, and motion for appt of interim class counsel. <i>NOTE: hours for principal work are summed for intervals of time and stated on the date the interval ended.</i>	12.5	
11/22/18	WLGjr	Reviewed similar PFAS lawsuits	16.4	
1/12/19	WLGjr	Communicated with HGD attys on science and other aspects of the case	11	
3/1/19	WLGjr	Discussed document review options and expense	9	
6/20/19	WLGjr	Reviewed amd complaint and briefing on same	16	
10/1/19	WLGjr	Participated with co counsel in discussion of discovery subjects ahead of class certification briefing	18.5	
12/3/19	WLGjr	Discussed issues and approved assignments for class certification briefing, researched law, and drafted sections of the motion, then reviewed draft brief as whole	54	
1/29/20	WLGjr	reviewed responsive briefing by defense and by 3rd parties	10	
5/8/20	WLGjr	Helped draft opposition to summary judgment and reviewed related pleadings, including defense reply for MSJ, and discussed and recommended ways to proceed on experts and Daubert practice	44.5	
6/18/20	WLGjr	Worked on new MSJ and related Daubert issues	32	
8/1/20	WLGjr	With co counsel, worked to obtain agreement to settle, followed up by notice to court for purposes of staying the case.	24.5	
10/28/21	WLGjr	Discussed with partners the various iterations of proposals and counters for a final settlement agreement and assisted in preparation of motion for approval of settlement	73	
			321.4	

EXHIBIT B

Heninger, Garrison & Davis, LLC
Job Ledger Report
For the Period From Jan 1, 2006 to Nov 30, 2021

Filter Criteria includes: 1) IDs from 18073521 to 18073521. Report order is by ID. Report is printed including Balance Forward and including Retainage.

Job ID	Phase ID	GL Acct ID	Trx Date	Trans Description	Amount	Totals
18073521	Copies	11000	7/17/18	Copies	8.10	
			7/24/18	Copies	29.10	
			7/25/18	Copies	4.50	
			7/26/18	Copies	13.20	
			7/29/18	Copies	3.60	
			7/30/18	Copies	9.90	
			7/30/18	Copies	53.10	
			7/31/18	Copies	16.65	
			7/31/18	Copies	9.60	
			8/1/18	Copies	33.15	
			9/16/18	Copies	4.05	
			10/21/18	Copies	2.70	
			10/21/18	Copies	5.40	
			10/30/18	Copies	39.90	
			10/31/18	Copies	0.30	
			11/4/18	Copies	0.75	
			11/8/18	Copies	0.60	
			11/18/18	Copies	14.10	
			11/25/18	Copies	30.30	
			1/28/19	Copies	1.50	
			2/11/19	Copies	0.90	
			2/14/19	Copies	2.70	
			2/25/19	Copies	3.00	
			2/28/19	Copies	59.40	
			3/5/19	Copies	138.90	
			3/6/19	Copies	0.90	
			3/20/19	Copies	27.90	
			3/20/19	Copies	11.10	
			3/24/19	Copies	17.55	
			3/26/19	Copies	1.80	
			3/27/19	Copies	7.20	
			4/11/19	Copies	0.90	
			4/24/19	Copies	0.90	
			4/25/19	Copies	0.90	
			4/28/19	Copies	15.30	
			5/5/19	Copies	15.60	
			5/6/19	Copies	16.20	
			5/8/19	Copies	29.55	
			5/20/19	Copies	6.90	
			5/27/19	Copies	0.90	
			6/3/19	Copies	4.05	
			6/9/19	Copies	2.70	
			6/9/19	Copies	2.70	
			6/10/19	Copies	0.45	
			6/16/19	Copies	5.10	
			6/19/19	Copies	0.60	
			6/25/19	Copies	18.30	
			6/27/19	Copies	15.60	
			7/7/19	Copies	40.50	
			7/16/19	Copies	14.10	
			7/24/19	Copies	13.80	
			8/8/19	Copies	1.80	
			8/8/19	Copies	10.80	
			8/11/19	Copies	196.20	
			8/11/19	Copies	5.10	
			8/12/19	Copies	6.00	
			8/15/19	Copies	0.90	
			8/15/19	Copies	8.70	
			8/19/19	Copies	0.60	
			8/21/19	Copies	36.90	
			8/25/19	Copies	9.90	
			8/25/19	Copies	10.80	
			8/26/19	Copies	12.00	
			8/28/19	Copies	13.20	
			9/8/19	Copies	2.40	
			9/15/19	Copies	5.70	
			9/29/19	Copies	15.60	

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Job Ledger Report
For the Period From Jan 1, 2006 to Nov 30, 2021

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Job ID	Phase ID	GL Acct ID	Trx Date	Trans Description	Amount	Totals
			9/30/19	Copies	7.50	
			10/2/19	Copies	0.90	
			10/7/19	Copies	11.10	
			10/8/19	Copies	10.80	
			10/9/19	Copies	1.50	
			10/20/19	Copies	5.85	
			10/21/19	Copies	0.90	
			10/22/19	Copies	5.40	
			10/23/19	Copies	10.05	
			10/24/19	Copies	4.20	
			10/27/19	Copies	3.30	
			10/28/19	Copies	20.10	
			10/29/19	Copies	0.30	
			10/30/19	Copies	18.90	
			10/31/19	Copies	1.80	
			11/3/19	Copies	0.30	
			11/4/19	Copies	18.60	
			11/5/19	Copies	0.30	
			11/13/19	Copies	64.95	
			11/14/19	Copies	18.60	
			11/14/19	Copies	1.50	
			11/17/19	Copies	74.25	
			11/18/19	Copies	114.30	
			11/19/19	Copies	25.20	
			11/20/19	Copies	37.80	
			11/21/19	Copies	36.45	
			11/21/19	Copies	1.20	
			11/24/19	Copies	227.10	
			11/25/19	Copies	11.40	
			11/25/19	Copies	40.20	
			11/26/19	Copies	69.90	
			11/30/19	Copies	13.50	
			12/1/19	Copies	10.20	
			12/2/19	Copies	75.15	
			12/2/19	Copies	4.80	
			12/3/19	Copies	349.35	
			12/3/19	Copies	26.40	
			12/4/19	Copies	368.55	
			12/5/19	Copies	1.95	
			12/8/19	Copies	25.80	
			12/9/19	Copies	1.65	
			12/9/19	Copies	5.10	
			12/10/19	Copies	8.40	
			12/11/19	Copies	3.15	
			12/12/19	Copies	22.65	
			12/12/19	Copies	0.60	
			12/16/19	Copies	54.60	
			12/17/19	Copies	4.50	
			12/18/19	Copies	6.00	
			12/19/19	Copies	1.20	
			12/25/19	Copies	10.50	
			12/26/19	Copies	1.80	
			1/5/20	Copies	11.40	
			1/6/20	Copies	3.30	
			1/7/20	Copies	57.60	
			1/8/20	Copies	0.60	
			1/8/20	Copies	22.20	
			1/9/20	Copies	19.80	
			1/12/20	Copies	15.30	
			1/13/20	Copies	156.60	
			1/14/20	Copies	53.70	
			1/15/20	Copies	16.80	
			1/15/20	Copies	2.10	
			1/16/20	Copies	53.40	
			1/20/20	Copies	16.80	
			1/21/20	Copies	58.80	
			1/21/20	Copies	86.70	

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Job ID	Phase ID	GL Acct ID	Trx Date	Trans Description	Amount	Totals
			1/22/20	Copies	149.40	
			1/23/20	Copies	30.60	
			1/26/20	Copies	61.20	
			1/27/20	Copies	93.00	
			1/28/20	Copies	14.70	
			1/31/20	Copies	0.60	
			2/3/20	Copies	17.10	
			2/4/20	Copies	42.75	
			2/9/20	Copies	21.60	
			2/12/20	Copies	50.40	
			2/13/20	Copies	1.35	
			2/17/20	Copies	100.95	
			2/18/20	Copies	13.20	
			2/19/20	Copies	31.20	
			2/20/20	Copies	1,775.40	
			2/23/20	Copies	30.00	
			2/24/20	Copies	0.45	
			2/25/20	Copies	48.60	
			2/26/20	Copies	788.25	
			3/2/20	Copies	147.60	
			3/2/20	Copies	10.20	
			3/3/20	Copies	184.80	
			3/4/20	Copies	7.50	
			3/5/20	Copies	1,186.50	
			3/5/20	Copies	9.90	
			3/8/20	Copies	630.60	
			3/9/20	Copies	355.80	
			3/10/20	Copies	93.00	
			3/12/20	Copies	0.90	
			3/15/20	Copies	0.60	
			4/20/20	Copies	9.90	
			4/22/20	Copies	26.40	
			5/18/20	Copies	12.00	
			5/26/20	Copies	17.40	
			5/27/20	Copies	2.70	
			5/28/20	Copies	40.35	
			5/31/20	Copies	0.75	
			6/1/20	Copies	51.60	
			6/4/20	Copies	11.70	
			6/8/20	Copies	23.25	
			6/15/20	Copies	63.90	
			6/17/20	Copies	3.60	
			6/24/20	Copies	1.05	
			6/25/20	Copies	3.60	
			6/28/20	Copies	32.40	
			7/1/20	Copies	0.30	
			8/18/20	Copies	0.30	
			9/10/20	Copies	2.10	
			9/15/20	Copies	3.60	
			9/21/20	Copies	19.20	
			10/1/20	Copies	16.20	
			10/6/20	Copies	4.50	
			10/22/20	Copies	0.30	
			5/6/21	Copies	1.80	
			6/10/21	Copies	0.90	
			6/14/21	Copies	0.30	
			6/16/21	Copies	5.10	
			7/20/21	Copies	2.25	
			7/28/21	Copies	1.80	
			10/31/21	Copies	30.00	
						9,796.50
	Court Cost	11000	5/5/20	West Morgan-East Lawrence Wate - Witness Appearance Fee	100.00	

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Job ID	Phase ID	GL Acct ID	Trx Date	Trans Description	Amount	Totals
				Fee		
						100.00
	Depo	11000	12/5/19	Veritext - Transcript of Larry Watkins Taken on 11/22/19	510.90	
			12/9/19	Veritext - Transcripts of Mary Lanette Lindsey and Tommy Lindsey Taken on 11/21/19	776.20	
			12/26/19	Veritext - Video Depos of Mary Lanette and Tommy Lindsey Taken on 11/21/19	344.40	
			12/26/19	Veritext - Transcript of Bryan Kiley Pate, P.E., Taken on 12/18/19	630.35	
			1/10/20	Veritext - Transcript of Russell Detwiller, Ph. D., Taken on 01/03/2020	565.60	
			1/21/20	Veritext - Transcript of Ralph Q. Summerford Taken on 01/16/2020	410.40	
			2/10/20	Veritext - Transcript of Barry Ryan Taken on 01/21/2020	1,172.90	
			2/25/20	Veritext - Transcript of Barbara Beck, PhD, Taken on 01/31/2020	1,257.70	
			2/25/20	Veritext - Transcript of Philippe Grandjean, MD, PhD, Taken on 02/03/2020	1,259.45	
			3/4/20	Veritext - Transcript of Michael Greenberg, MD, MPH, Taken on 02/14/2020	1,200.65	
			3/13/20	Veritext - Transcript of Avram J. Frankel, PE, Taken on 02/26/2020	1,206.65	
			3/19/20	Veritext - Transcript of Larry A. Neal, PE, Taken on 03/10/2020	1,243.45	
			4/30/20	Veritext - Transcript of Ralph G. Werling Taken on 02/21/2020	1,346.35	
			4/30/20	Veritext - Video of Ralph G. Werling Taken on 02/21/2020	1,382.00	
			6/10/20	Veritext - Transcript of David Magnusson Taken on 06/05/2020	800.50	
			6/22/20	Birmingham Reporting Service, - Video Depo of Don Sims Taken on 05/29/2020	417.50	
			8/10/20	Birmingham Reporting Service, - Transcript of Don Sims Taken on 05/29/2020	546.60	
			8/19/20	Veritext - Transcript of Venetia Watkins Taken on 01/03/2020	330.40	
			8/19/20	Veritext - Cancellation Fee for Depo on 06/09/2020	105.00	
			8/19/20	Veritext - Cancellation Fee for Depo on 06/09/2020	350.00	
			8/19/20	Veritext - Video Depo of David Magnusson Taken on 06/05/2020	576.55	
						16,433.55

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Job ID	Phase ID	GL Acct ID	Trx Date	Trans Description	Amount	Totals
	Expert	11000	5/9/19	Shaun Anthony Crawford - Expert Fees	10,459.88	
			5/21/19	Landmark Research Group, LLC - Expert Retainer for Dr. Randall Bell, PhD, MAI	10,000.00	
			7/10/19	cicayda LLC - June Document Hosting	16,137.30	
			8/1/19	The Appraisal & Consultant Gro - Retainer for Expert Fees	21,000.00	
			8/13/19	Dr. Barry Ryan - Expert Fees	5,000.00	
			8/16/19	James J. Connors & Associates, - Expert: PFAS, initial work, June and July 2019	4,631.25	
			8/20/19	Paycom Payroll, LLC Expense - Cicayda Document Hosting	12,538.83	
			8/22/19	The Appraisal & Consultant Gro - Expert expenses from 7/9/19 to 8/16/19 (difference owed after using retainer of \$21,000)	913.24	
			9/9/19	James J. Connors & Associates, - Expert Fees	9,050.68	
			9/12/19	Insite Engineering - Expert Fees	3,375.00	
			9/16/19	The Appraisal & Consultant Gro - Expert Fees	14,550.53	
			9/17/19	Shaun Anthony Crawford - Expert Fees	5,819.30	
			9/17/19	Paycom Payroll, LLC Expense - Cicayda - Document Hosting	12,084.70	
			10/15/19	Paycom Payroll, LLC Expense - Cicayda September Monthly Hosting	14,616.20	
			10/25/19	James J. Connors & Associates, - Expert Fees	9,847.50	
			11/12/19	Paycom Payroll, LLC Expense - Cicayda Document Hosting	13,953.67	
			11/13/19	The Appraisal & Consultant Gro - Expert Fees - 9/14 - 9/18/19	12,911.86	
			11/13/19	The Appraisal & Consultant Gro - Expert Fees - Dues for Decatur/Huntsville Area MLS	150.00	
			11/15/19	cicayda LLC - Expert Fees	14,911.80	
			11/18/19	Forensic/Strategic Solutions, - Expert Fees	6,037.00	
			11/26/19	cicayda LLC - Expert Fees - Reviewer Time and Team Leader Time Week Ending 11.17.19	16,694.40	
			11/26/19	James J. Connors & Associates, - Expert Fees	5,717.40	
			11/27/19	Russell L. Detwiler - Russell Detwiler - September and October	6,825.00	
			12/2/19	cicayda LLC - Reviewer Time, Team Leader Time Week Ending 11.24.19	16,611.60	
			12/5/19	Russell L. Detwiler - Russell Detwiler - November	4,550.00	

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Job ID	Phase ID	GL Acct ID	Trx Date	Trans Description	Amount	Totals
			12/11/19	cicayda LLC - Reviewer Time, Team Leader Time Week Ending 12.1.19	10,746.40	
			12/11/19	Insite Engineering - 9/27/19 - Records Research, Meeting at HGD	1,215.00	
			12/11/19	Insite Engineering - 11/25/19 - WMELWSA Sample Review	405.00	
			12/11/19	Insite Engineering - 11/25/19 - Meeting at HGD	810.00	
			12/11/19	Insite Engineering - 11/30/19 - Affidavit Prep	405.00	
			12/12/19	Taylor Bartlett - Invoice No. 21709 - Monthly Hosting, Expert Fees	15,403.69	
			12/19/19	Forensic/Strategic Solutions, - Expert Fees	17,364.00	
			12/20/19	cicayda LLC - Reviewer Time, Team Leader Time Week Ending 12.14.19	6,092.26	
			12/20/19	Forensic/Strategic Solutions, - Expert Fees	14,502.50	
			1/7/20	cicayda LLC - Reviewer Time, Team Leader Time Week Ending 12.29.19	2,433.18	
			1/7/20	cicayda LLC - December 2019 Monthly Hosting, Expert Fees	13,831.38	
			1/13/20	Forensic/Strategic Solutions, - Expert Fees - 12/15/19-12/23/19	14,949.00	
			1/15/20	cicayda LLC - Reviewer Time, Team Leader Time Week Ending 01.03.2020	2,764.68	
			1/16/20	Insite Engineering - 12/1/19 - Affidavit Prep	540.00	
			1/16/20	Insite Engineering - 12/2/19 - Affidavit Prep	405.00	
			1/16/20	Insite Engineering - 12/12/19 - WMELWSA Sample Research & Review	1,080.00	
			1/16/20	Insite Engineering - 12/12/19 - Gathering Subpoenaed Documents	270.00	
			1/16/20	Insite Engineering - 12/13/19 - Printing Subpoenaed Docs	350.00	
			1/16/20	Insite Engineering - 12/13/19 - Gathering Subpoenaed Documents	1,080.00	
			1/16/20	Insite Engineering - 12/16/19 - Printing Subpoenaed Docs	150.00	
			1/16/20	Insite Engineering - 12/16/19 - Meeting at HGD	1,350.00	
			1/16/20	Insite Engineering - 12/17/19 - Conference Call	270.00	
			1/16/20	Insite Engineering - 12/18/19 - Deposition at HGD	1,755.00	
			1/17/20	Philippe A. Grandjean - Expert Fees	4,000.00	
			1/29/20	cicayda LLC - Reviewer Time, Team Leader Time Week Ending 01.19.2020	4,386.50	
			1/29/20	cicayda LLC - Reviewer Time, Team Leader Time Week Ending 01.11.2020	1,242.00	
			2/7/20	James J. Connors &	2,837.25	

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Job ID	Phase ID	GL Acct ID	Trx Date	Trans Description	Amount	Totals
			2/10/20	Associates, - Expert Fees Forensic/Strategic Solutions, - Expert Fees - 1/16/20-1/27/20	3,630.00	
			2/11/20	James J. Connors & Associates, - Expert Fees	9,572.29	
			2/12/20	Russell L. Detwiler - Russell Detwiler - January	9,472.60	
			2/13/20	cicayda LLC - Reviewer Time, Team Leader Time Week Ending 12.07.19	15,875.50	
			2/13/20	cicayda LLC - Reviewer Time, Team Leader Time Week Ending 12.21.19	264.00	
			2/13/20	cicayda LLC - January Monthly Hosting, Expert Fees	14,361.78	
			2/13/20	cicayda LLC - Reviewer Time, Team Leader Time Week Ending 02.02.2020	5,239.08	
			2/17/20	Forensic/Strategic Solutions, - Expert Fees - 1/2/20-1/15/20	28,156.50	
			2/19/20	James J. Connors & Associates, - Expert Fees	4,203.12	
			2/20/20	Forensic/Strategic Solutions, - Expert Fees - 2/6/20-2/12/20	3,436.50	
			3/2/20	Philippe A. Grandjean - Expert Fees 01/06 - 02/03/2020	9,500.00	
			3/4/20	cicayda LLC - February 2020 Document Hosting, Project Management	17,597.26	
			3/4/20	Forensic/Strategic Solutions, - Expert Fees - 2/21/20-2/28/20	6,563.29	
			3/19/20	Forensic/Strategic Solutions, - Expert Fees - 3/3/20 to 3/13/20	3,803.90	
			4/2/20	cicayda LLC - March 2020 Document Hosting, Research Documents, Project Management	11,905.51	
			4/2/20	Scott M. Bartell, PhD - Expert Fees - 2/1/20 to 3/31/20	525.00	
			4/7/20	John H. Pardue, PhD, PE - PFAS reading and reports 1/6/20-1/27/20	17,250.00	
			4/8/20	Forensic/Strategic Solutions, - Expert Fees 3/16/20 to 3/31/20	13,982.50	
			4/13/20	Dr. Barry Ryan - Experts Fees for August 2019	1,400.00	
			4/13/20	Dr. Barry Ryan - Experts Fees for September 2019	3,500.00	
			4/13/20	Dr. Barry Ryan - Experts Fees for October 2019	1,575.00	
			4/13/20	Dr. Barry Ryan - Experts Fees for November 2019	1,662.50	
			4/13/20	Dr. Barry Ryan - Experts Fees for December 2019	2,362.50	
			4/13/20	Dr. Barry Ryan - Experts Fees for January 2020	8,500.00	
			4/13/20	Dr. Barry Ryan - Less Retainer paid in August 2019	-5,000.00	
			4/14/20	Insite Engineering - Expert Fees 1/6/20-3/18/20	2,565.00	

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			4/21/20	Forensic/Strategic Solutions, - Expert Fees 4/1/20 to 4/14/20	17,150.00	
			4/30/20	cicayda LLC - April 2020 Document Hosting, Research Documents, Project Management	11,305.68	
			5/4/20	Forensic/Strategic Solutions, - Expert Fees 4/15/20 to 4/29/20	11,936.00	
			5/15/20	James J. Connors & Associates, - Expert Fees 3/2 - 3/25/2020	4,923.75	
			5/20/20	Insite Engineering - Expert Fees 4/17 - 4/23/20	5,670.00	
			5/20/20	James J. Connors & Associates, - Expert Fees 4/16 - 04/23/2020	986.00	
			5/21/20	Forensic/Strategic Solutions, - Expert Fees 5/1/20 to 5/18/20	5,651.50	
			6/4/20	Forensic/Strategic Solutions, - Expert Fees 5/15/20 to 5/29/20	3,969.50	
			6/8/20	cicayda LLC - May 2020 Document Hosting, Project Management	11,655.68	
			6/8/20	James J. Connors & Associates, - Expert Fees for Depo Prep 6/28/2020	1,365.00	
			6/25/20	Forensic/Strategic Solutions, - Expert Fees 6/1/20 to 6/12/20	11,789.50	
			7/1/20	cicayda LLC - June 2020 Document Hosting, Project Management	11,435.54	
			7/6/20	Forensic/Strategic Solutions, - Expert Fees 6/15/20 to 6/29/20	20,311.50	
			7/7/20	James J. Connors & Associates, - Expert Fees 06/12 - 06/30/2020	1,950.00	
			7/8/20	John H. Pardue, PhD, PE - Expert Fees 05/22 - 06/20/2020	8,250.00	
			7/20/20	Forensic/Strategic Solutions, - Expert Fees 7/2/20 to 7/16/20	16,772.50	
			7/20/20	Forensic/Strategic Solutions, - Expert Fees 6/5/20 - Analysis	1,081.00	
			8/7/20	Forensic/Strategic Solutions, - Expert Fees 7/17/20 to 7/24/20	11,193.00	
			8/17/20	cicayda LLC - July 2020 Document Hosting, Project Management	2,477.87	
			8/21/20	Forensic/Strategic Solutions, - Expert Fees 8/11/20 to 8/18/20	2,610.00	
			9/9/20	Forensic/Strategic Solutions, - Expert Fees 8/18/20 to 8/26/20	4,210.50	
			9/21/20	Forensic/Strategic Solutions, - Expert Fees 9/2/20 to 9/14/20	818.50	
			10/6/20	Forensic/Strategic Solutions,	1,641.50	

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			2/18/21	- Expert Fees 9/15/20 to 9/25/20 Forensic/Strategic Solutions,	1,423.00	
			3/19/21	- Expert Fees 2/5/21 to 2/16/21 Forensic/Strategic Solutions,	8,925.00	
			4/9/21	- Expert Fees 3/4/21 to 3/15/21 Forensic/Strategic Solutions,	7,807.00	
			5/6/21	- Expert Fees 3/15/21 to 3/26/21 Forensic/Strategic Solutions,	868.00	
			5/24/21	- Expert Fees 4/30/21 to 5/5/21 Forensic/Strategic Solutions,	1,344.00	
			6/4/21	- Expert Fees 5/3/21 to 5/20/21 Forensic Strategic Solutions -	819.00	
			6/16/21	Expert Fees 5/17/21 to 6/2/21 Forensic Strategic Solutions -	1,309.00	
			7/8/21	Expert Fees 6/4/21 to 6/11/21 Forensic Strategic Solutions -	3,172.50	
			7/23/21	Expert Fees 6/23/21 to 7/2/21 Forensic Strategic Solutions -	2,772.31	
				Expert Fees 7/6/21 to 7/16/21		
						758,523.14
	Fedex	11000	8/12/19	FedEx - Package to The Appraisal & Consultant Group 8/1/19	23.12	
			8/26/19	FedEx - Package to Dr. James Connors 8/15/19	27.85	
			11/15/21	FedEx - Package to Tommy and Lanette Lindsey 10/29/21	50.09	
			11/15/21	FedEx - Package to Larry and Venetia Watkins 10/29/21	51.43	
			11/15/21	FedEx - Package from Tommy and Lanette Lindsey 11/02/21	23.01	
						175.50
	Filing Fees	11000	4/24/19	PNC Bank - Courts/USDC AL-SP	50.00	
			8/9/19	MLQ Attorney Services - Service of Process re: The West Morgan-East Lawrence Water Authority	85.00	
			8/9/19	MLQ Attorney Services - Service of Process re: West Lawrence Water Cooperative	95.00	
			8/9/19	MLQ Attorney Services - Service of Process re: Falkville Water Works	85.00	
			8/9/19	MLQ Attorney Services - Service of Process re: Town Creek Water System	95.00	

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			8/9/19	MLQ Attorney Services - Service of Process re: Trinity Water Works	85.00	
			8/9/19	MLQ Attorney Services - Service of Process re: V A W Water System Inc.	85.00	
			2/5/20	MLQ an ABC Legal Company - Service of Process re: West Lawrence Water Cooperative	250.00	
						830.00
	Investigate	11000	12/31/19	Jim Morton Investigations - Background Checks	100.00	
						100.00
	Mileage	11000	8/17/18	Ken Henry - Mileage to Federal Court 7/31/18	1.09	
			8/17/18	Ken Henry - Mileage to Federal Court 8/1/18	1.09	
			11/21/18	Chris Hood - Mileage to Decatur	103.55	
			9/9/19	Luke Huffstutler - Mileage on 9/6/19	11.60	
			9/23/19	Luke Huffstutler - Mileage to Trinity, AL, to Pick up Records from Municipal Bldg 9/20/19	116.00	
			11/11/19	Paycom Payroll, LLC Expense - Mileage for Hand Deliveries 10/24/19	1.16	
			11/22/19	Paycom Payroll, LLC Expense - Mileage to 3M Inspection 11/21/19	104.40	
			12/10/19	Paycom Payroll, LLC Expense - Mileage to Zoe's, Airport 11/21/19	8.70	
			2/7/20	Paycom Payroll, LLC Expense - Mileage to Federal Court for Filing 01/22/2020	1.16	
			2/21/20	Paycom Payroll, LLC Expense - Mileage for CLE on 02.13.2020	138.23	
						486.98
	Misc	11000	12/4/18	AccessData Group, Inc. - Discovery Document Review	129.00	
			1/4/19	AccessData Group, Inc. - Discovery Document Review	135.00	
			5/13/19	AccessData Group, Inc. - Discovery Document Review	135.00	
			5/20/19	AccessData Group, Inc. - Discovery Document Review	135.00	
			5/20/19	AccessData Group, Inc. - Discovery Document Review	135.00	
			5/20/19	AccessData Group, Inc. - Discovery Document Review	135.00	
			6/18/19	AccessData Group, Inc. - Discovery Document Review	135.00	
			8/9/19	Town Creek Water & Sewer Dept - Document Production	3,704.00	

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Job ID	Phase ID	GL Acct ID	Trx Date	Trans Description	Amount	Totals
			9/18/19	Town of Trinity, Alabama - Document Production	317.62	
			10/23/19	USPS Boxes	15.96	
			12/10/19	Paycom Payroll, LLC	149.00	
				Expense - State Bar of Wisconsin - Preparing for Your Depo - DVD		
			12/11/19	V.A.W. Water System, Inc. - Labor for compiling, sorting, labeling information	1,955.00	
			12/17/19	Town of Falkville - Document Production	148.25	
			12/18/19	PNC Bank - AI Inter Sub; EGov.com	15.00	
			1/29/20	MLQ an ABC Legal Company - Notary Service Larry Watkins	200.00	
			1/29/20	MLQ an ABC Legal Company - Notary Service Tommy Lindsey and Lanette Lindsey	200.00	
			2/21/20	Paycom Payroll, LLC	358.33	
				Expense - AAJ CLE		
			4/27/20	Birmingham Reporting Service, - Video Inspection	789.62	
						8,791.78
	Pacer	11000	8/14/18	Pacer Service Center - Pacer - 00PCL	0.40	
			8/14/18	Pacer Service Center - Pacer - ALNDC	2.00	
			8/14/18	Pacer Service Center - Pacer - ALNDC	8.00	
			8/14/18	Pacer Service Center - Pacer - ALNDC	13.50	
			8/14/18	Pacer Service Center - Pacer - ALNDC	46.80	
			9/10/18	Pacer Service Center - Pacer - ALNDC	2.80	
			11/13/18	Pacer Service Center - Pacer - JPMLDC	0.70	
			11/13/18	Pacer Service Center - Pacer - ALNDC	4.20	
			11/13/18	Pacer Service Center - Pacer - JPMLDC	34.00	
			12/14/18	Pacer Service Center - Pacer - 00PCL	12.30	
			12/14/18	Pacer Service Center - Pacer - ALNDC	21.20	
			12/14/18	Pacer Service Center - Pacer - JPMLDC	0.10	
			12/14/18	Pacer Service Center - Pacer - NJDC	1.90	
			12/14/18	Pacer Service Center - Pacer - OHSDC	0.30	
			2/15/19	Pacer Service Center - Pacer - 00PCL	0.10	
			2/15/19	Pacer Service Center - Pacer - 00PCL	0.30	
			2/15/19	Pacer Service Center - Pacer - 00PCL	0.10	
			2/15/19	Pacer Service Center - Pacer - ALMDC	3.50	
			2/15/19	Pacer Service Center - Pacer - ALNDC	9.00	

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			2/15/19	Pacer Service Center - Pacer - ALNDC	0.10	
			4/11/19	Pacer Service Center - Pacer - 00PCL	0.20	
			4/11/19	Pacer Service Center - Pacer - ILNDC	4.60	
			5/20/19	Pacer Service Center - Pacer - 00PCL	1.10	
			5/20/19	Pacer Service Center - Pacer - 11CA	12.10	
			5/20/19	Pacer Service Center - Pacer - ALNDC	8.80	
			6/14/19	Pacer Service Center - Pacer - ALNDC	5.30	
			7/15/19	PACER Service Center - Pacer - 00PCL	0.30	
			7/15/19	PACER Service Center - Pacer - ALMDC	2.70	
			7/15/19	PACER Service Center - Pacer - ALNDC	14.40	
			7/15/19	PACER Service Center - Pacer - ALNDC	20.00	
			9/11/19	PACER Service Center - Pacer - 00PCL	0.30	
			9/11/19	PACER Service Center - Pacer - ALNBK	0.20	
			9/11/19	PACER Service Center - Pacer - ALNDC	0.30	
			9/11/19	PACER Service Center - Pacer - 00PCL	0.10	
			9/11/19	PACER Service Center - Pacer - ALNDC	3.50	
			9/11/19	PACER Service Center - Pacer - 00PCL	0.10	
			9/11/19	PACER Service Center - Pacer - ALNBK	3.30	
			10/14/19	PACER Service Center - Pacer - ALNDC	4.10	
			10/14/19	PACER Service Center - Pacer - ALNDC	0.30	
			10/14/19	PACER Service Center - Pacer - 00PCL	0.30	
			10/14/19	PACER Service Center - Pacer - ALNDC	3.50	
			10/14/19	PACER Service Center - Pacer - ALNDC	0.20	
			11/11/19	PACER Service Center - Pacer - 00PCL	0.10	
			11/11/19	PACER Service Center - Pacer - OHSDC	0.40	
			12/10/19	PACER Service Center - Pacer - 11CA	0.20	
			12/10/19	PACER Service Center - Pacer - ALMDC	21.80	
			12/10/19	PACER Service Center - Pacer - ALNDC	30.80	
			12/10/19	PACER Service Center - Pacer - FLMDL	6.00	
			12/10/19	PACER Service Center - Pacer - 00PCL	0.20	
			12/10/19	PACER Service Center - Pacer - 00PCL	0.40	
			12/10/19	PACER Service Center - Pacer - ALNDC	8.00	
			12/10/19	PACER Service Center - Pacer - ALMDC	6.70	
			12/10/19	PACER Service Center -	2.80	

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			12/10/19	Pacer - ALNDC		
				PACER Service Center -	0.20	
			1/13/20	Pacer - VAEDC		
				PACER Service Center -	0.10	
			1/13/20	Pacer - 00PCL		
				PACER Service Center -	2.80	
			1/13/20	Pacer - ALNDC		
				PACER Service Center -	3.70	
			1/13/20	Pacer - ALNDC		
				PACER Service Center -	3.00	
			1/13/20	Pacer - ALNDC		
				PACER Service Center -	0.10	
			1/13/20	Pacer - 00PCL		
				PACER Service Center -	3.00	
			2/13/20	Pacer - ALNDC		
				PACER Service Center -	15.10	
			2/13/20	Pacer - ALNDC		
				PACER Service Center -	8.80	
			2/13/20	Pacer - FLSDC		
				PACER Service Center -	16.50	
			2/13/20	Pacer - NJDC		
				PACER Service Center -	3.20	
			2/13/20	Pacer - ALNDC		
				PACER Service Center -	0.10	
			2/13/20	Pacer - 00PCL		
				PACER Service Center -	1.80	
			2/13/20	Pacer - ALNDC		
				PACER Service Center -	1.90	
			2/13/20	Pacer - 00PCL		
				PACER Service Center -	0.20	
			2/13/20	Pacer - ALNBK		
				PACER Service Center -	38.70	
			2/13/20	Pacer - ALNDC		
				PACER Service Center -	0.40	
			2/13/20	Pacer - ALSDC		
				PACER Service Center -	4.10	
			2/13/20	Pacer - KSDC		
				PACER Service Center -	8.80	
			2/13/20	Pacer - LAMDC		
				PACER Service Center -	1.40	
			2/13/20	Pacer - LAWDC		
				PACER Service Center -	6.00	
			2/13/20	Pacer - TXSDC		
				PACER Service Center -	6.00	
			3/13/20	Pacer - CANDC		
				PACER Service Center -	0.20	
			3/13/20	Pacer - 00PCL		
				PACER Service Center -	15.60	
			4/9/20	Pacer - ALNDC		
				PACER Service Center -	0.60	
			4/9/20	Pacer - ALNDC		
				PACER Service Center -	0.50	
			4/9/20	Pacer - 00PCL		
				PACER Service Center -	5.10	
			5/13/20	Pacer - FLNDC		
				PACER Service Center -	3.00	
			5/13/20	Pacer - ALNDC		
				PACER Service Center -	0.70	
			5/13/20	Pacer - 00PCL		
				PACER Service Center -	3.20	
			5/13/20	Pacer - ALNBK		
				PACER Service Center -	7.00	
			5/13/20	Pacer - ALNDC		
				PACER Service Center -	5.10	
			5/13/20	Pacer - GANDC		
				PACER Service Center -	4.40	
				Pacer - ORDC		

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			5/13/20	PACER Service Center - Pacer - ALNDC	14.30	
			6/22/20	PACER Service Center - Pacer - 00PCL	0.50	
			6/22/20	PACER Service Center - Pacer - ALNDC	5.50	
			7/13/20	PACER Service Center - Pacer - ALNDC	0.50	
			7/13/20	PACER Service Center - Pacer - ALNDC	0.30	
			10/13/20	PACER Service Center - Pacer - 00PCL	0.20	
			10/13/20	PACER Service Center - Pacer - ALMDC	0.10	
						517.10
	Parking	11000	12/31/19	City of Birmingham - E231407 - Client	15.00	
			1/14/20	American Express - New CS Parking Service	10.00	
						25.00
	Postage	11000	2/14/19	Postage	1.00	
			8/12/19	Postage	2.60	
			8/28/19	Postage	29.40	
			10/9/19	Postage	14.70	
			1/8/20	Postage	0.50	
						48.20
	Printing	11000	3/13/19	Source One Legal Copy, Inc. - Black & White Documents Scanned, Data CD, DVD Duplication	360.67	
			8/26/19	Source One Legal Copy, Inc. - Digital Endorsing, B&W Documents Scanned, Flash Drive	698.23	
			12/10/19	Source One Legal Copy, Inc. - Tiff Conversion, Data CD	77.52	
			1/16/20	Insite Engineering - Printing Subpoenaed Docs	803.05	
			1/29/20	MLQ an ABC Legal Company - Print Copies	84.90	
			2/13/20	Source One Legal Copy, Inc. - Documents Printed	1,031.87	
			2/26/20	Source One Legal Copy, Inc. - B&W Documents Scanned, Flash Drive	9,171.65	
			2/26/20	Source One Legal Copy, Inc. - B&W Documents Scanned, Color Oversize Copies Scanned & Printed, Data CD	197.23	
			3/4/20	Source One Legal Copy, Inc. - B&W Documents Scanned, Digital Endorsing, Flash Drive	607.12	
			4/29/20	Source One Legal Copy, Inc. - B&W Documents Printed, Tabs, Binders	204.35	
			6/15/20	Source One Legal Copy, Inc. - B&W and Color Documents	751.81	

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Job ID	Phase ID	GL Acct ID	Trx Date	Trans Description	Amount	Totals
				- B&W and Color Documents Printed, Slipsheets		13,988.40
	Research	11000	8/3/18	RELX Inc DBA LexisNexis - Research	64.66	
			8/3/18	RELX Inc DBA LexisNexis - Research	192.63	
			8/3/18	RELX Inc DBA LexisNexis - Research	48.51	
			9/4/18	RELX Inc DBA LexisNexis - Research	50.53	
			9/14/18	LexisNexis CourtLink, Inc. - CourtLink	1.45	
			11/5/18	RELX Inc DBA LexisNexis - Research	40.46	
			11/9/18	LexisNexis CourtLink, Inc. - CourtLink	5.16	
			2/1/19	RELX Inc DBA LexisNexis - Research	30.56	
			2/1/19	RELX Inc DBA LexisNexis - Research	103.36	
			3/12/19	LexisNexis CourtLink, Inc. - CourtLink	91.87	
			4/3/19	RELX Inc DBA LexisNexis - Research	343.24	
			6/5/19	RELX Inc DBA LexisNexis - Research	112.48	
			7/3/19	RELX Inc DBA LexisNexis - Research	133.99	
			7/3/19	RELX Inc DBA LexisNexis - Research	969.56	
			8/8/19	LexisNexis CourtLink, Inc. - CourtLink	22.64	
			9/3/19	RELX Inc DBA LexisNexis - Research	304.64	
			9/3/19	RELX Inc DBA LexisNexis - Research	11.98	
			10/3/19	RELX Inc DBA LexisNexis - Research	76.00	
			10/3/19	RELX Inc DBA LexisNexis - Research	223.40	
			11/4/19	RELX Inc DBA LexisNexis - Research	382.42	
			11/4/19	RELX Inc DBA LexisNexis - Research	43.55	
			11/4/19	RELX Inc DBA LexisNexis - Research	39.60	
			12/3/19	RELX Inc DBA LexisNexis - Research	423.24	
			12/3/19	RELX Inc DBA LexisNexis - Research	177.48	
			12/3/19	RELX Inc DBA LexisNexis - Research	400.41	
			1/2/20	RELX Inc DBA LexisNexis - Research	273.57	
			1/2/20	RELX Inc DBA LexisNexis - Research	214.11	
			1/2/20	RELX Inc DBA LexisNexis - Research	349.92	
			1/2/20	RELX Inc DBA LexisNexis - Research	42.19	
			1/2/20	RELX Inc DBA LexisNexis - Research	20.42	

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			2/3/20	RELX Inc DBA LexisNexis - Research	577.92	
			2/3/20	RELX Inc DBA LexisNexis - Research	880.16	
			2/3/20	RELX Inc DBA LexisNexis - Research	17.86	
			3/2/20	RELX Inc DBA LexisNexis - Research	93.71	
			3/2/20	RELX Inc DBA LexisNexis - Research	590.67	
			4/2/20	RELX Inc DBA LexisNexis - Research	626.61	
			4/2/20	RELX Inc DBA LexisNexis - Research	70.90	
			4/2/20	RELX Inc DBA LexisNexis - Research	241.71	
			4/2/20	RELX Inc DBA LexisNexis - Research	1.00	
			5/4/20	RELX Inc DBA LexisNexis - Research	80.36	
			5/4/20	RELX Inc DBA LexisNexis - Research	99.92	
			5/4/20	RELX Inc DBA LexisNexis - Research	506.72	
			5/4/20	RELX Inc DBA LexisNexis - Research	3.78	
			6/30/20	RELX Inc DBA LexisNexis - Research	1.15	
			6/30/20	RELX Inc DBA LexisNexis - Research	1.15	
			6/30/20	RELX Inc DBA LexisNexis - Research	9.20	
			6/30/20	RELX Inc DBA LexisNexis - Research	5.75	
			6/30/20	RELX Inc DBA LexisNexis - Research	52.88	
			6/30/20	RELX Inc DBA LexisNexis - Research	1,098.29	
			7/2/20	RELX Inc DBA LexisNexis - Research	4.56	
			7/2/20	RELX Inc DBA LexisNexis - Research	95.89	
			7/2/20	RELX Inc DBA LexisNexis - Research	711.72	
			7/2/20	RELX Inc DBA LexisNexis - Research	281.98	
			8/3/20	RELX Inc DBA LexisNexis - Research	108.12	
			8/3/20	RELX Inc DBA LexisNexis - Research	37.98	
			10/2/20	RELX Inc DBA LexisNexis - Research	0.67	
			10/2/20	RELX Inc DBA LexisNexis - Research	35.39	
			12/2/20	RELX Inc DBA LexisNexis - Research	17.61	
			1/4/21	RELX Inc DBA LexisNexis - Research	1.36	
			2/2/21	RELX Inc DBA LexisNexis - Research	10.05	
			3/3/21	RELX Inc DBA LexisNexis - Research	70.99	
			5/3/21	RELX Inc DBA LexisNexis - Research	36.03	
			7/2/21	RELX Inc DBA LexisNexis - Research	1.47	
			7/2/21	RELX Inc DBA LexisNexis - Research	0.15	

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			9/2/21	Research RELX Inc DBA LexisNexis -	6.74	
			9/2/21	Research RELX Inc DBA LexisNexis -	4.51	
			11/2/21	Research RELX Inc DBA LexisNexis -	17.63	
						11,596.62
	Subpoena	11000	1/28/20	West Lawrence Water Cooperativ - Appearance Fee and Mileage	100.00	
						100.00
	Travel	11000	8/1/18	Jeanie Sleadd - Dinner for Chris from Slice on 7/31/18	27.12	
			11/21/18	Chris Hood - Westin in Decatur for Status Conference and Client Meeting on 11/19 - 11/20/18	158.61	
			11/21/18	Chris Hood - Bravo	21.78	
			12/11/18	Chris Hood - Hotel in NYC for Status Conference, Client/Attorney Meeting on 11/26 - 11/27/18	539.91	
			12/11/18	Chris Hood - Delta	714.40	
			12/11/18	Chris Hood - Westville Hudson	32.04	
			12/11/18	Chris Hood - Uber	10.48	
			12/11/18	Chris Hood - Uber	9.26	
			12/11/18	Chris Hood - Uber	57.27	
			12/11/18	Chris Hood - City Nights Valet	42.00	
			12/11/18	Chris Hood - Taxi (cash, no receipt)	60.00	
			4/12/19	American Express - Bettola	144.55	
			7/15/19	American Express - Surin	46.78	
			7/16/19	Chris Hood - Hertz Rent-A-Car for Expert Inspection on 7/10/19	70.55	
			7/16/19	Chris Hood - Shell Oil	37.07	
			7/16/19	Chris Hood - The Rail Yard	56.87	
			7/16/19	Chris Hood - Chick-Fil-A	18.43	
			8/26/19	Chris Hood - Marriott in Decatur to Interview Class Reps, Obtain Subpoena Documents 8/19 - 8/20/19	145.08	
			8/26/19	Chris Hood - Logans	40.35	
			10/14/19	American Express - Brick & Tin	32.00	
			11/22/19	Paycom Payroll, LLC Expense - Courtyard by Marriot for Mark, Caroline and Expert 11/19/19	563.76	
			11/22/19	Paycom Payroll, LLC Expense - The RailYard 11/19/19	61.23	
			11/22/19	Paycom Payroll, LLC Expense - Courtyard by Marriot	8.57	
			11/22/19	Paycom Payroll, LLC Expense - Courtyard by Marriot	32.10	

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			11/22/19	Marriot Paycom Payroll, LLC	3.36	
				Expense - Marathon Petroleum		
			11/25/19	CITIBUSINESS Card - RBT	-3.82	
				Zoe's Kitchen		
			11/25/19	CITIBUSINESS Card - Zoe's Kitchen	95.59	
			11/25/19	CITIBUSINESS Card - Newks	8.02	
			11/25/19	CITIBUSINESS Card - News	83.34	
			11/25/19	CITIBUSINESS Card - Westin	233.63	
			11/25/19	CITIBUSINESS Card - Westin	262.75	
			12/10/19	Paycom Payroll, LLC	406.06	
				Expense - Fairfield Inn for 3M Clients for Depos 12/9/19		
			12/12/19	American Express - Bottega	189.13	
			12/12/19	American Express - Niki's West	49.02	
			12/12/19	American Express - Bamboo on 2nd	41.10	
			12/12/19	American Express - East West	69.75	
			12/12/19	American Express - Johnny's	41.20	
			12/12/19	American Express - El Barrio	88.10	
			12/30/19	CITIBUSINESS Card - Zoe's Kitchen	30.21	
			12/30/19	CITIBUSINESS Card - Chick-Fil-A	71.82	
			12/30/19	CITIBUSINESS Card - Zoe's Kitchen - Lunch for TCD	40.88	
			12/30/19	CITIBUSINESS Card - Zoe's Kitchen RBT	-1.21	
			1/6/20	Larry Watkins - Fairfield by Marriott for Depo	180.98	
			1/6/20	Larry Watkins - Paramount	36.87	
			1/14/20	American Express - Crispina Ristorante	91.26	
			1/14/20	American Express - Hotel Indigo	3.50	
			1/21/20	Capital One - Hotels.com	146.36	
			1/21/20	Capital One - Hotels.com	218.18	
			1/21/20	Capital One - Hotels.com	146.36	
			1/21/20	Capital One - Hotels.com	292.72	
			1/21/20	Capital One - Hotels.com	226.16	
			1/31/20	CITIBUSINESS Card - RBT Zoes Kitchen	-1.64	
			2/7/20	Paycom Payroll, LLC	60.23	
				Expense - Waitr Inc. for Water Brief Session on 01/30/2020		
			2/11/20	American Express - Hotel Indigo Atlanta	65.00	
			2/11/20	American Express - Johnny's Food	45.62	
			2/11/20	American Express - CCI*Hotel Res	221.67	
			2/11/20	American Express - Blue Ridge Grill	142.70	
			2/11/20	American Express - Courtyard	204.71	
			2/11/20	American Express - Courtyard	194.96	
			2/21/20	Paycom Payroll, LLC	406.63	
				Expense - Hotel Peter & Paul		

Heninger, Garrison & Davis, LLC
Job Ledger Report
For the Period From Jan 1, 2006 to Nov 30, 2021

Filter Criteria includes: 1) IDs from 18073521 to 18073521. Report order is by ID. Report is printed including Balance Forward and including Retainage.

Job ID	Phase ID	GL Acct ID	Trx Date	Trans Description	Amount	Totals
			2/21/20	Paycom Payroll, LLC	38.91	
				Expense - Lyft		
			2/21/20	Paycom Payroll, LLC	67.78	
				Expense - Meals		
			2/28/20	Capital One - Hotels.com	-197.66	
			2/28/20	Capital One - Hotels.com	-169.16	
			2/28/20	Capital One - Hotels.com	-28.50	
			2/28/20	Capital One - Jimmy Johns	56.51	
			2/28/20	Capital One - Hotels.com	169.16	
			2/28/20	Capital One - Hotels.com	28.64	
			2/28/20	Capital One - Paces and Vine	50.64	
			2/26/21	CITIBUSINESS Card - Chick-Fil-A - lunch for 3M Meeting	65.89	
						7,403.62
	Wire Fees	11000	5/28/20	Outgoing Wire Fee for Dr. Grandjean	20.00	
						20.00
18073521	Total					828,936.39
Report	Total					828,936.39

3M Alabama (Lindsey)
CORRECTED LEDGER OF EXPENSES ADVANCED BY HANNON LAW FIRM, LLC

DATE	DESCRIPTION OF EXPENSES	COST
03/08/19	Fed Ex to Chirs Hood	\$ 25.50
03/11/19	UA DEN to BHM 3M alabama	\$ 472.30
03/11/19	Courtyard by Marriott - Alabama	\$ 210.33
03/11/19	Lyft services	\$ 49.29
03/11/19	Lyft services	\$ 19.06
03/13/19	UA BHM to DEN 3M Alabama	\$ 378.30
04/30/19	Pacer research	\$ 0.60
06/30/19	Lexis Nexis reseach June	\$ 17.02
11/12/19	RTD -to airport	\$ 16.50
11/12/19	Lyft	\$ 16.72
11/12/19	UA to BHM	\$ 538.30
11/12/19	Redmont Hotel BHM AL	\$ 620.00
11/15/19	UA to DEN	\$ 538.30
11/15/19	RTD - from airport	\$ 10.50
11/19/19	RTD to airport	\$ 16.50
11/19/19	travel meal	\$ 10.12
11/19/19	UA to BHM	\$ 548.30
11/19/19	Avis tolls	\$ 23.85
11/20/19	Avis car rental - Alabama	\$ 79.28
11/20/19	Courtyard by Marriott - Alabama	\$ 187.92
11/20/19	fuel	\$ 7.60
11/20/19	fuel	\$ 15.50
11/22/19	Fairfield Inn	\$ 514.65
11/22/19	UA BHM to Den	\$ 548.30
11/20/19	fuel	\$ 15.50
11/22/19	taxi expense	\$ 62.48
11/22/19	RTD from airport	\$ 10.50
11/24/19	Avis tolls	\$ 2.05
12/29/19	UA to SNA	\$ 422.30
12/30/19	AC Hotels by Marriott	\$ 144.41
12/30/19	meal	\$ 32.83
12/30/20	fuel	\$ 4.46
12/30/19	travel meal	\$ 3.77
12/30/19	pkg Irvine CA	\$ 13.00
12/30/19	Avis car rental SNA	\$ 59.90
12/30/19	UA SNA to DEN	\$ 422.30
12/30/19	DIA pkg	\$ 48.00
12/31/19	Lexis Nexis - research December	\$ 28.83
12/31/19	Pacer services October - December 2019	\$ 6.90
01/01/20	UA Denver to ATL	\$ 508.30

3M Alabama (Lindsey)
CORRECTED LEDGER OF EXPENSES ADVANCED BY HANNON LAW FIRM, LLC

01/02/20	Lyft services	\$	27.89
01/02/20	Lyft services	\$	43.36
01/02/20	Ipassword	\$	17.94
01/03/20	Lyft services	\$	37.75
01/03/20	Delta Air - Atlanta to Denver	\$	597.40
01/04/20	Avis car rental	\$	14.05
01/04/20	DIA Parking	\$	76.00
01/19/20	UA DEN to ATL	\$	508.40
01/16/20	meal	\$	29.66
01/20/20	Courtyard Inn	\$	5.04
01/21/20	UA ATL to DEN	\$	508.40
01/21/20	DIA pkg	\$	84.00
01/23/20	1/20/20 - 1/23/20 Lyft services	\$	154.30
01/30/20	meal	\$	39.03
01/30/20	UA to BOS	\$	558.40
01/30/20	Fed ex x 2 from Bos	\$	170.92
01/31/20	taxi service	\$	27.95
01/31/20	meal	\$	3.48
01/31/20	meal	\$	29.53
01/31/20	Lyft services	\$	33.03
02/01/20	meal with expert	\$	158.25
02/03/20	meals x 2	\$	35.10
02/03/20	Marriott Custom house	\$	880.55
02/03/20	2/3/20 Lyft services	\$	104.15
02/03/20	Jet Blue BOS DEN	\$	337.40
02/03/20	Jet Blue meal	\$	12.00
02/03/20	DIA pkg	\$	140.00
01/31/20	Lexis Nexis - research January	\$	33.70
02/13/20	UA DEN PHL	\$	534.40
02/14/20	airport meal	\$	10.78
02/14/20	Courtyard PHL	\$	189.21
02/14/20	Southwest - PHL DEN	\$	562.98
02/15/20	2/13/20-2/15/20 Lyft services	\$	143.86
02/15/20	DIA PKG	\$	56.00
02/15/20	Publication - epidemiology	\$	9.41
02/19/20	UA DEN BHM	\$	563.39
02/20/20	2/19 and 2/20/20 meals	\$	71.38
02/20/20	fuel BHM	\$	28.46
02/20/20	parking	\$	15.00
02/21/20	The Elyton Hotel BHM	\$	545.33
02/21/20	Hertz car rental AI to GA	\$	320.20
02/21/20	fuel	\$	13.73
02/21/20	parking	\$	14.00
02/21/20	Delta from ATL	\$	507.40
02/25/20	UA to San Jose	\$	346.39
02/26/20	Residence inn San Carlos CA	\$	549.79
02/26/20	fuel	\$	2.03
02/26/20	Avis car rental	\$	120.84

3M Alabama (Lindsey)
CORRECTED LEDGER OF EXPENSES ADVANCED BY HANNON LAW FIRM, LLC

02/26/20	meals	\$	24.49
02/26/20	Southwest - San Jose to DEN	\$	434.98
02/26/20	DIA Parking	\$	56.00
02/26/20	publication -contaminants and health	\$	9.17
02/29/20	Lexis Nexis research - February	\$	57.06
03/31/20	Pacer services -January to March 2020	\$	144.31
03/31/20	Lexis Nexis research - March	\$	10.05
04/20/20	Fed Ex to Tim Davis	\$	15.34
04/30/20	Lexis Nexis research - April	\$	26.20
06/30/20	Lexis Nexis - June	\$	28.02
06/30/20	In house black and white photocopies - April thru June	\$	26.25
06/30/20	In house color copies -April thru June	\$	5.00
06/30/20	Pacer services - April - June	\$	15.60
	<i>Expenses Advanced:</i>	\$	<i>16,775.00</i>

EXHIBIT C

Heninger, Garrison & Davis, LLC
Cash Disbursements Journal
For the Period From Jan 1, 2019 to Nov 30, 2021

Filter Criteria includes: 1) Vendor IDs from Crawford-S to Crawford-S; 2) Vendor Name from to . Report order is by Date. Report is printed in Detail Format.

Date	Check #	Account ID	Line Description	Debit Amount	Credit Amount
5/9/19	36153	11000 10100	Expert Fees Shaun Anthony Crawford	10,459.88	10,459.88
9/17/19	37208	20000 10100	Invoice: HGD 19-02 Shaun Anthony Crawford	5,819.30	5,819.30
Total				16,279.18	16,279.18

Heninger, Garrison & Davis, LLC
Cash Disbursements Journal
For the Period From Jan 1, 2019 to Nov 30, 2021

Filter Criteria includes: 1) Vendor IDs from Landmark-Research to Landmark-Research. Report order is by Date. Report is printed in Detail Format.

Date	Check #	Account ID	Line Description	Debit Amount	Credit Amount
5/21/19	35434	11000	Expert Retainer for Dr. Randall Bell, PhD, MAI	10,000.00	
		10100	Landmark Research Group, LLC		10,000.00
	Total			10,000.00	10,000.00

Heninger, Garrison & Davis, LLC
Cash Disbursements Journal
For the Period From Jan 1, 2019 to Nov 30, 2021

Filter Criteria includes: 1) Vendor IDs from Appraisal-Consultant to Appraisal-Consultant. Report order is by Date. Report is printed in Detail Format.

Date	Check #	Account ID	Line Description	Debit Amount	Credit Amount
8/1/19	36822	11000	Retainer for Expert Fees	21,000.00	
		10100	The Appraisal & Consultant Group, Inc.		21,000.00
8/22/19	36733	20000	Invoice: 35043	913.24	
		10100	The Appraisal & Consultant Group, Inc.		913.24
9/18/19	37218	20000	Invoice: 35132	14,550.53	
		10100	The Appraisal & Consultant Group, Inc.		14,550.53
11/15/19	37826	20000	Invoice: 35166	12,911.86	
		20000	Invoice: 35259	150.00	
		10100	The Appraisal & Consultant Group, Inc.		13,061.86
Total				49,525.63	49,525.63

Heninger, Garrison & Davis, LLC
Cash Disbursements Journal
For the Period From Jan 1, 2019 to Nov 30, 2021

Filter Criteria includes: 1) Vendor IDs from Ryan-B to Ryan-B. Report order is by Date. Report is printed in Detail Format.

Date	Check #	Account ID	Line Description	Debit Amount	Credit Amount
8/13/19	36908	11000	Expert Fees	5,000.00	
		10100	Dr. Barry Ryan		5,000.00
4/15/20	38977	20000	Invoice:	14,000.00	
			20200412001		
		10100	Dr. Barry Ryan		14,000.00
Total				19,000.00	19,000.00

Heninger, Garrison & Davis, LLC
Cash Disbursements Journal
For the Period From Jan 1, 2019 to Nov 30, 2021

Filter Criteria includes: 1) Vendor IDs from Bartell-S to Bartell-S. Report order is by Date. Report is printed in Detail Format.

Date	Check #	Account ID	Line Description	Debit Amount	Credit Amount
4/7/20	38912	20000 10100	Invoice: 4.1.2020 Scott M. Bartell	525.00	525.00
	Total			525.00	525.00

Heninger, Garrison & Davis, LLC
Cash Disbursements Journal
For the Period From Jan 1, 2019 to Nov 30, 2021

Filter Criteria includes: 1) Vendor IDs from Detwiler-R to Detwiler-R. Report order is by Date. Report is printed in Detail Format.

Date	Check #	Account ID	Line Description	Debit Amount	Credit Amount
11/27/19	37377	20000 10100	Invoice: 1 Russell L. Detwiler	6,825.00	6,825.00
12/6/19	37422	20000 10100	Invoice: 2 Russell L. Detwiler	4,550.00	4,550.00
2/14/20	38508	20000 10100	Invoice: 3 Russell L. Detwiler	9,472.60	9,472.60
Total				20,847.60	20,847.60

Heninger, Garrison & Davis, LLC
Cash Disbursements Journal
For the Period From Jan 1, 2019 to Nov 30, 2021

Filter Criteria includes: 1) Vendor IDs from Insite-Engineering to Insite-Engineering. Report order is by Date. Report is printed in Detail Format.

Date	Check #	Account ID	Line Description	Debit Amount	Credit Amount
9/13/19	37188	20000 10100	Invoice: 2019-458 Insite Engineering	3,375.00	3,375.00
12/11/19	37454	20000 10100	Invoice: 2019-645 Insite Engineering	2,835.00	2,835.00
1/17/20	38184	20000 10100	Invoice: 2019-710 Insite Engineering	8,053.05	8,053.05
4/14/20	38974	20000 10100	Invoice: 2020-139 Insite Engineering	2,565.00	2,565.00
5/21/20	39216	20000 10100	Invoice: 2020-202 Insite Engineering	5,670.00	5,670.00
Total				22,498.05	22,498.05

Heninger, Garrison & Davis, LLC
Cash Disbursements Journal
For the Period From Jan 1, 2019 to Nov 30, 2021

Filter Criteria includes: 1) Vendor IDs from Pardue-J to Pardue-J. Report order is by Date. Report is printed in Detail Format.

Date	Check #	Account ID	Line Description	Debit Amount	Credit Amount
4/7/20	38944	20000 10100	Invoice: 6645 John H. Pardue, PhD, PE	17,250.00	17,250.00
7/15/20	39607	20000 10100	Invoice: 6691 John H. Pardue, PhD, PE	8,250.00	8,250.00
Total				<u>25,500.00</u>	<u>25,500.00</u>

Heninger, Garrison & Davis, LLC
Cash Disbursements Journal
For the Period From Jan 1, 2019 to Nov 30, 2021

Filter Criteria includes: 1) Vendor IDs from Forensic-Strategic to Forensic-Strategic. Report order is by Date. Report is printed in Detail Format.

Date	Check #	Account ID	Line Description	Debit Amount	Credit Amount
11/18/19	37360	20000 10100	Invoice: 219083 Forensic Strategic Solutions	6,037.00	6,037.00
12/27/19	38057	20000 20000 10100	Invoice: 219149 Invoice: 219106 Forensic Strategic Solutions	17,364.00 14,502.50	31,866.50
1/17/20	38181	20000 10100	Invoice: 219192 Forensic Strategic Solutions	14,949.00	14,949.00
2/14/20	38509	20000 10100	Invoice: 219256 Forensic Strategic Solutions	3,630.00	3,630.00
2/21/20	38561	20000 20000 10100	Invoice: 219222 Invoice: 219288 Forensic Strategic Solutions	28,156.50 3,436.50	31,593.00
3/11/20	38708	20000 10100	Invoice: 219321 Forensic Strategic Solutions	6,563.29	6,563.29
3/31/20	38306	20000 10100	Invoice: 219368 Forensic Strategic Solutions	3,803.90	3,803.90
4/14/20	38973	20000 10100	Invoice: 219400 Forensic Strategic Solutions	13,982.50	13,982.50
4/28/20	39034	20000 10100	Invoice: 219425 Forensic Strategic Solutions	17,150.00	17,150.00
5/5/20	39038	20000 10100	Invoice: 21460 Forensic Strategic Solutions	11,936.00	11,936.00
5/29/20	39268	20000 10100	Invoice: 219492 Forensic Strategic Solutions	5,651.50	5,651.50
7/2/20	39513	20000 10100	Invoice: 219520 Forensic Strategic Solutions	3,969.50	3,969.50
7/15/20	39596	20000 10100	Invoice: 219548 Forensic Strategic Solutions	11,789.50	11,789.50
7/23/20	39650	20000 20000 10100	Invoice: 219570 Invoice: 219594 Forensic Strategic Solutions	20,311.50 17,853.50	38,165.00
8/27/20	39826	20000 20000 10100	Invoice: 219616 Invoice: 219639 Forensic Strategic Solutions	11,193.00 2,610.00	13,803.00

Heninger, Garrison & Davis, LLC
Cash Disbursements Journal
For the Period From Jan 1, 2019 to Nov 30, 2021

Filter Criteria includes: 1) Vendor IDs from Forensic-Strategic to Forensic-Strategic. Report order is by Date. Report is printed in Detail Format.

Date	Check #	Account ID	Line Description	Debit Amount	Credit Amount
9/10/20	40025	20000 10100	Invoice: 219664 Forensic Strategic Solutions	4,210.50	4,210.50
9/24/20	40118	20000 10100	Invoice: 219700 Forensic Strategic Solutions	818.50	818.50
10/8/20	40319	20000 10100	Invoice: 219732 Forensic Strategic Solutions	1,641.50	1,641.50
2/24/21	41049	20000 10100	Invoice: 220034 Forensic Strategic Solutions	1,423.00	1,423.00
3/24/21	41182	20000 10100	Invoice: 220092 Forensic Strategic Solutions	8,925.00	8,925.00
4/14/21	41447	20000 10100	Invoice: 220115 Forensic Strategic Solutions	7,807.00	7,807.00
5/12/21	41577	20000 10100	Invoice: 220167 Forensic Strategic Solutions	868.00	868.00
5/26/21	41647	20000 10100	Invoice: 220196 Forensic Strategic Solutions	1,344.00	1,344.00
6/8/21	41689	20000 10100	Invoice: 220219 Forensic Strategic Solutions	819.00	819.00
6/25/21	41786	20000 10100	Invoice: 220243 Forensic Strategic Solutions	1,309.00	1,309.00
7/13/21	41866	20000 10100	Invoice: 220273 Forensic Strategic Solutions	3,172.50	3,172.50
8/13/21	42004	20000 10100	Invoice: 220292 Forensic Strategic Solutions	2,772.31	2,772.31
Total				250,000.00	250,000.00

PHILIPPE GRANDJEAN

Filter Criteria includes: 1) Vendor IDs from Grandjean-P to Grandjean-P. Report order

	A	B	D	E
1	Date	Check #	Line Description	Debit Amount
2	1/17/20	37498	Expert Fees	4,000.00
3	1/17/20	37498	Philippe A. Grandjean	
4	3/11/20	38709	Invoice: 3M 03.02.2020	9,500.00
5	3/11/20	38709	Philippe A. Grandjean	
6				
7		Total		13,500.00
8				

CICAYDA

Filter Criteria includes: 1) Vendor IDs from cicayda to cicayda. Report order is by Da

	A	B	D	E
1	Date	Check #	Line Description	Debit Amount
2				
3	7/10/19	36625	Invoice: 20819	16,137.30
4	11/18/19	37359	Invoice: 21656	14,911.80
5	11/27/19	37380	Invoice: 21657	16,694.40
6	12/3/19	37922	Invoice: 21658	16,611.60
7	12/11/19	37455	Invoice: 21830	10,746.40
8	12/27/19	38056	Invoice: 21848	6,092.26
9	1/9/20	38119	Invoice: 22016	2,433.18
10	1/10/20	38149	Invoice: 21900	13,831.38
11	1/17/20	38178	Invoice: 22019	2,764.68
12	1/31/20	38384	Invoice: 22025	4,386.50
13	1/31/20	38384	Invoice: 22022	1,242.00
14	2/19/20	38542	Invoice: 21839	15,875.50
15	2/19/20	38542	Invoice: 21851	264.00
16	2/19/20	38542	Invoice: 22077	14,361.78
17	2/19/20	38542	Invoice: 22191	5,239.08
18	3/11/20	38703	Invoice: 22247	17,597.26
19	4/14/20	38958	Invoice: 22434	11,905.51
20	5/5/20	39041	Invoice: 22595	11,305.68
21	6/11/20	39374	Invoice: 22755	11,655.68
22	7/9/20	39555	Invoice: 22900	11,435.54
23	8/19/20	39785	Invoice: 23048	2,477.87
24				
25		Total		191,832.10
26				
27				
28				
29	PAID THRU PAYCOM BY TAYLOR:			
30				
31	8/20/19			12,538.83
32	9/17/19			12,084.70
33	10/15/19			14,616.20
34	11/12/19			13,953.67
35	12/12/19			15,403.69
36				
37				
38		GRAND TOTAL		260,429.19

Heninger, Garrison Davis, LLC**Cash Disbursements Journal****For the Period From Jan 1, 2019 to Nov 30, 2021**

Filter Criteria includes: 1) Vendor IDs from Connors-J to Connors-J. Report order is b

Date	Check #	Account ID	Line Description	Debit Amount
8/22/19	37002	20000	Invoice: HGDL196701	4,631.25
8/22/19	37002	10100	James J. Connors & Associates, LLC	
9/13/19	37177	20000	Invoice: HGDL190801	9,050.68
9/13/19	37177	10100	James J. Connors & Associates, LLC	
10/31/19	37709	20000	Invoice: HGDL190901	9,847.50
10/31/19	37709	10100	James J. Connors & Associates, LLC	
11/27/19	37379	20000	Invoice: HGDL191001	5,717.40
11/27/19	37379	10100	James J. Connors & Associates, LLC	
2/7/20	38458	20000	Invoice: HGDL20120117	2,837.25
2/7/20	38458	10100	James J. Connors & Associates, LLC	
2/14/20	38505	20000	Invoice: HGDL191101	9,572.29
2/14/20	38505	10100	James J. Connors & Associates, LLC	
2/21/20	38559	20000	Invoice: HGDL200218	4,203.12
5/21/20	39212	20000	Invoice: HGDL200407W	4,923.75
5/21/20	39212	20000	Invoice: PFAS200519	986.00
5/21/20	39212	10100	James J. Connors & Associates, LLC	
6/11/20	39373	20000	Invoice: HGDL200605	1,365.00
6/11/20	39373	10100	James J. Connors & Associates, LLC	
7/15/20	39595	20000	Invoice: HGDL200706	1,950.00
7/15/20	39595	10100	James J. Connors & Associates, LLC	
Total				55,084.24

EXHIBIT 2

Timothy C. Davis
W. Lewis Garrison, Jr.
Christopher B. Hood
Heninger Garrison Davis, LLC
2224 First Avenue North
Birmingham AL 35203
205-326-3336

CONTRACT FOR REPRESENTATION FOR PROPOSED CLASS ACTION

[REDACTED] ("Client") hereby retains, as of the 17th day of July, 2018, the law firm of Heninger Garrison Davis, LLC ("Attorneys") to represent him or her in any pending or proposed class action against 3M COMPANY, DYNEON, L.L.C., and/or DAIKIN AMERICA, INC. Client agrees that the compensation to be paid to Attorneys, if the case is certified as a class action, shall be established by the court that will hear the case or approve the settlement. No attorney fees are due from client nor is Client required to pay expenses or court costs in the event this case is certified as a class action. All expenses and costs relating to the prosecution of this matter will be advanced by Attorneys. Client understands that client may be entitled to damages as a member of the Class (if certified) and further may be entitled to such compensation as a court would authorize for a Class Representative Plaintiff, if the class is certified and a successful conclusion reached.

Should it be necessary for Client to travel to hearings, depositions and/or conferences which are held out of town, all costs shall be advanced by Attorneys including travel expenses and lodging expenses.

Client understands that it has certain duties as a Class Representative which the court requires in order for Client to adequately and fairly represent the proposed class. Client is aware that it must generally understand the complaint and its claims (from a layman's perspective), know generally the identities of the parties to the lawsuit, and the reasons for the lawsuit. Client agrees to vigorously prosecute the litigation and to be responsible for providing notice to the class through Attorneys. Attorneys will bear the cost of any class notice. Further details of the Client's duties are provided in the attached Rights and Responsibilities document.

Client further understands that, if necessary, Attorneys, at their sole discretion, may associate other law firms to assist in the prosecution of this class action and client hereby authorizes Attorneys to do so. Client further understands that any law firm associated in this matter by Attorneys is authorized to act on Client's behalf and on behalf of the class. The addition of such law firm shall not affect the individual contingency fee amount referenced below.

Furthermore, if this matter is **not** certified as a class action and individual action is pursued and recovery made on client's behalf, client agrees to pay Attorneys an undivided contingent fee in the amount of forty percent (40%). Client also agrees to and understands that this attorney fee (on an individual claim) shall be deducted from the total settlement or judgment of the individual claim after expenses incurred are deducted.

Contract for Representation of Proposed Class Action

Client understands that expenses include but are not limited to the following: filing fees, depositions, investigative fees, expert fees, travel expenses, photocopies, transcript copies, trial exhibits, online research expenses, cost of notice to the class (if necessary) and other costs usual and customary to the litigation process.

Under no circumstances shall client be required to reimburse Attorneys for any expenses or pay Attorneys any attorney fees if the case is unsuccessful.

Client has been advised that, in accordance with applicable Rules of Professional Conduct, Attorneys may place any short-term or nominal client funds in an Interest On Lawyers Trust Account (IOLTA), the interest of which is paid to charity.

Although Attorneys will perform professional services on Client's behalf to the best of our ability, we cannot make and have not made any guarantees regarding the outcome of this legal representation. Any expressions about the outcome of the matter are our best professional estimates only, and are limited by our knowledge of the facts and circumstances at the time they are expressed.

Attorneys maintains error and omissions insurance coverage applicable to any anticipated legal services to be provided under this agreement.

THIS IS AN ENFORCEABLE CONTRACT

In the event you have any questions, please do not execute this contract until you have had all your questions fully answered. If the foregoing terms accurately reflect your understanding of our attorney-client relationship, please execute the original of this contract. This agreement constitutes the full understanding of the terms of our engagement to represent you in the above-referenced matter and supersedes any prior oral or written understanding.

CLIENT'S RECEIPT OF AGREEMENT AND ACKNOWLEDGMENT OF TERMS

You acknowledge that you have read and understand all the terms and conditions of this agreement before signing it, and have had the opportunity to review this Agreement with other counsel of your choice. You also acknowledge that you have received a copy of this Agreement upon execution thereof. We look forward to serving you in this matter. If you have any questions about this agreement or any of its terms, we will be happy to discuss and address your questions with you or another attorney before you give your approval and acceptance.

Signed this 20 day of November, 2018.

By: _____

Printed Name: _____

For HENINGER GARRISON DAVIS, LLC:

Timothy C. Davis
W. Lewis Garrison, Jr.
Christopher B. Hood
Heninger Garrison Davis, LLC
2224 First Avenue North
Birmingham AL 35203
205-326-3336

RIGHTS AND RESPONSIBILITIES OF A CLASS REPRESENTATIVE:

To assist you in understanding your role as a class representative in the lawsuit against Car-Mart and any of its subsidiaries, parents, distributors, and dealerships, we briefly set forth below a description of your responsibilities. Please contact us at any time to further clarify any of these points or if you have any questions.

1. **You are suing as a class representative.** As such, you represent the interests of all class members who have been affected by the challenged conduct.

2. **Duty as a class representative.** As a class representative, the law requires that you will adequately and fairly represent the class. This is your duty. Here is how you are expected to accomplish that duty:

a. You must be generally familiar with the litigation.

i. This does not mean you must know every aspect of this litigation. We will keep you informed of major events, and this will satisfy your duty. You should read the complaint and understand it generally (from a layman's perspective). You should know generally who the parties are and the reasons you are suing.

ii. You may and should confer with us at any time it is appropriate to do so.

b. You must vigorously prosecute the litigation.

This basically means that you will authorize your attorneys to do what is necessary to successfully prosecute this case on behalf of the class. You have done so and we will vigorously pursue this case.

c. You must hire lawyers experienced in class action litigation.

We have experience in class action litigation. We have represented numerous classes with successful outcomes.

3. **Responsibility for expenses or costs:** Expenses or costs include such items as filing fees, photocopies, depositions, travel expenses, trial exhibits, investigative fees, expert fees, transcript copies, online research expenses, and the cost of notice to the class (if necessary)

and other costs usual and customary to the litigation process. All costs are being advanced by your counsel and you are not responsible for the payment even if we are unsuccessful. Typically, in such cases, the costs are paid (pursuant to an order of the presiding judge) from the amount recovered from the defendants, if we are successful.

4. **Notice to the Class.** You may be responsible for providing notice to the class. We will undertake this task on your behalf and be responsible for all costs. Notice is usually accomplished by mailing a notice to identifiable class members and/or publishing a notice in newspapers.

5. **No special treatment.** You have not been promised any special treatment above the treatment which may be awarded to other class members. If successful, we will ask that the judge award you additional compensation for the extra time and effort you expended as a class representative and for having the courage to challenge defendants' conduct. We cannot guarantee that the judge will grant our request.

6. **You do not have a duty to investigate or to be an expert.** As an intimidation tactic, the defendant may ask you in a deposition what investigation you have undertaken to fulfill your duty as a class representative. You have no such duty personally — this is why you have hired experienced lawyers. We have conducted a thorough investigation and you have fulfilled your duty by relying on us to do so. We will discuss and have discussed with you our investigation. Nonetheless, it is a good practice for you to familiarize yourself with the allegations in the Complaint, to read our reports to you, and to stay generally abreast of developments.

7. **Attorney's fees.** Our fees (payment for our time) for the class claims must be approved by the court and are dependent upon a recovery. If we recover nothing, you owe us no money. You will be provided with notice of our fee request and you will have the opportunity to discuss it with us and object to our request if you choose to do so. If we are unsuccessful in this litigation, you will not be obligated for any of our attorney's fees. In the unlikely event the court were to award the defendant attorney's fees and costs, we will pay such fees and costs. Any fee paid by you will be the same as is paid by all class members pursuant to court order.

8. **Settlement.** If this case settles and does not go to trial, the settlement of any class claims must be approved by the court. You are entitled to object to the settlement if you do not agree with our recommendation to settle. We will consult you before recommending a settlement.


9. **Safeguarding Your Documents.** It is important that we provide the Defendants with every document which may prove to be relevant. Please be thorough in your search and provide us with everything which might possibly refer or relate to your case. Be over-inclusive in this process. We will review everything before producing it to the Defendants. Finally, it is important that you do not delete or destroy any document which might possibly be relevant to this litigation. This includes electronic documents, such as email and email attachments. Please make sure that you do not destroy any documents which may even be remotely related to this

case. If you have any question whatsoever about whether you should destroy any paper documents or electronic documents, **do not** destroy the documents.

10. **Judicial approval.** In prosecuting a class action, all of our actions are subject to judicial approval, and courts take that approval seriously. Thus, we are subject to scrutiny that other lawyers, including defendants' counsel, never receive. This should provide you comfort that our actions will be of the highest professional caliber.

RECEIVED, REVIEWED, AND APPROVED THIS 20 DAY OF November 2018.

BY: 

Name (printed): 

For HENINGER GARRISON DAVIS, LLC

Timothy C. Davis
W. Lewis Garrison, Jr.
Christopher B. Hood
Heninger Garrison Davis, LLC
2224 First Avenue North
Birmingham AL 35203
205-326-3336

CONTRACT FOR REPRESENTATION FOR PROPOSED CLASS ACTION

[REDACTED] ("Client") hereby retains, as of the 17th day of July, 2018, the law firm of Heninger Garrison Davis, LLC ("Attorneys") to represent him or her in any pending or proposed class action against 3M COMPANY, DYNEON, L.L.C., and/or DAIKIN AMERICA, INC. Client agrees that the compensation to be paid to Attorneys, if the case is certified as a class action, shall be established by the court that will hear the case or approve the settlement. No attorney fees are due from client nor is Client required to pay expenses or court costs in the event this case is certified as a class action. All expenses and costs relating to the prosecution of this matter will be advanced by Attorneys. Client understands that client may be entitled to damages as a member of the Class (if certified) and further may be entitled to such compensation as a court would authorize for a Class Representative Plaintiff, if the class is certified and a successful conclusion reached.

Should it be necessary for Client to travel to hearings, depositions and/or conferences which are held out of town, all costs shall be advanced by Attorneys including travel expenses and lodging expenses.

Client understands that it has certain duties as a Class Representative which the court requires in order for Client to adequately and fairly represent the proposed class. Client is aware that it must generally understand the complaint and its claims (from a layman's perspective), know generally the identities of the parties to the lawsuit, and the reasons for the lawsuit. Client agrees to vigorously prosecute the litigation and to be responsible for providing notice to the class through Attorneys. Attorneys will bear the cost of any class notice. Further details of the Client's duties are provided in the attached Rights and Responsibilities document.

Client further understands that, if necessary, Attorneys, at their sole discretion, may associate other law firms to assist in the prosecution of this class action and client hereby authorizes Attorneys to do so. Client further understands that any law firm associated in this matter by Attorneys is authorized to act on Client's behalf and on behalf of the class. The addition of such law firm shall not affect the individual contingency fee amount referenced below.

Furthermore, if this matter is **not** certified as a class action and individual action is pursued and recovery made on client's behalf, client agrees to pay Attorneys an undivided contingent fee in the amount of forty percent (40%). Client also agrees to and understands that this attorney fee (on an individual claim) shall be deducted from the total settlement or judgment of the individual claim after expenses incurred are deducted.

Contract for Representation of Proposed Class Action

Client understands that expenses include but are not limited to the following: filing fees, depositions, investigative fees, expert fees, travel expenses, photocopies, transcript copies, trial exhibits, online research expenses, cost of notice to the class (if necessary) and other costs usual and customary to the litigation process.

Under no circumstances shall client be required to reimburse Attorneys for any expenses or pay Attorneys any attorney fees if the case is unsuccessful.

Client has been advised that, in accordance with applicable Rules of Professional Conduct, Attorneys may place any short-term or nominal client funds in an Interest On Lawyers Trust Account (IOLTA), the interest of which is paid to charity.

Although Attorneys will perform professional services on Client's behalf to the best of our ability, we cannot make and have not made any guarantees regarding the outcome of this legal representation. Any expressions about the outcome of the matter are our best professional estimates only, and are limited by our knowledge of the facts and circumstances at the time they are expressed.

Attorneys maintains error and omissions insurance coverage applicable to any anticipated legal services to be provided under this agreement.

THIS IS AN ENFORCEABLE CONTRACT

In the event you have any questions, please do not execute this contract until you have had all your questions fully answered. If the foregoing terms accurately reflect your understanding of our attorney-client relationship, please execute the original of this contract. This agreement constitutes the full understanding of the terms of our engagement to represent you in the above-referenced matter and supersedes any prior oral or written understanding.

CLIENT'S RECEIPT OF AGREEMENT AND ACKNOWLEDGMENT OF TERMS

You acknowledge that you have read and understand all the terms and conditions of this agreement before signing it, and have had the opportunity to review this Agreement with other counsel of your choice. You also acknowledge that you have received a copy of this Agreement upon execution thereof. We look forward to serving you in this matter. If you have any questions about this agreement or any of its terms, we will be happy to discuss and address your questions with you or another attorney before you give your approval and acceptance.

Signed this 20 day of Nov., 2018.

By:

Printed Name:

Contract for Representation of Proposed Class Action

For HENINGER GARRISON DAVIS, LLC:

**Timothy C. Davis
W. Lewis Garrison, Jr.
Christopher B. Hood
Heninger Garrison Davis, LLC
2224 First Avenue North
Birmingham AL 35203
205-326-3336**

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