

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JEFFREY REICHERT and GARY MOYER,
both individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

KEEFE COMMISSARY NETWORK, L.L.C.
d/b/a ACCESS CORRECTIONS; RAPID
INVESTMENTS, INC., d/b/a RAPID
FINANCIAL SOLUTIONS, d/b/a ACCESS
FREEDOM; and CACHE VALLEY BANK,

Defendants.

NO. 3:17-cv-05848-BHS

DECLARATION OF RICHARD E.
SPOONEMORE RE: MOTION FOR
APPROVAL OF ATTORNEY FEES,
COSTS, AND CASE
CONTRIBUTION AWARDS AS TO
CLAIMS AGAINST RAPID
INVESTMENTS AND CACHE
VALLEY BANK

Note on Motion Calendar:
Fairness Hearing set on:
December 18, 2023, at 2:30 p.m.

Richard E. Spoonemore declares under penalty of perjury and in accordance with
the laws of the State of Washington that:

1. I am one of the attorneys for the Plaintiffs and Classes in this action. I am
a partner in the firm of Sirianni Youtz Spoonemore Hamburger, PLLC. Unless otherwise
stated, the facts in this declaration are based upon my personal knowledge.

2. *Attorney Time Devoted to the Case.* A redacted copy of our fee ledger is
attached hereto as *Exhibit 1*. Given that we have two active cases against other
defendants arising out of violations of the Electronic Funds Transfer Act, I have redacted
significant portions of the descriptions of the work we performed. Upon request, we

1 would be happy to provide an unredacted copy for the Court’s *in-camera* review. To date,
2 my firm has devoted 2399.2 hours in attorney time advancing the interests of the class.
3 The breakdown is as follows:

Attorney	Hours 2018 through 10/2023
Chris Youtz	1106.80
Rick Spoonemore	1079.60
Ele Hamburger	145.50
Ann Merryfield	62.70
Daniel Gross	4.60
Total	2399.2

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12 The time was all reasonably spent advancing the interests of the classes. As
13 detailed in the attached timesheets, in addition to the usual litigation activities necessary
14 to bring a case of this size to a successful conclusion under an inherently complex
15 statutory and regulatory scheme (and three trips to the Ninth Circuit), some unique
16 features demanded a large investment in time. As reflected in the timesheets for the year
17 2020, Class Counsel (with the assistance of staff; *see below*) reached out to approximately
18 950 facilities throughout the nation to secure admissible evidence (declarations, business
19 records obtained through records requests, statements of position on letterhead, and the
20 like) to show that, with only a couple of exceptions, class members were forced to receive
21 the return of their money by a prepaid card. This involved working with local counsel
22 in some states (in some jurisdictions, only a resident or local counsel can make a records
23 request), talking to local sheriffs, and issuing subpoenas, all to obtain this critical
24 information. Through this effort, we were able to document through admissible evidence
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(totaling 9,854 pages) that the institutions, with only a couple of exceptions, did not give releasees a choice between a release card and a check.

3. *Staff Time Devoted to the Case.* In 2020, after the COVID-19 lockdown went into effect, we enlisted three staff members to work on collecting information through public records requests, letters, and phone calls to the 950 institutions where Rapid’s release cards were in use or used at some point during the class period. The breakdown is as follows for the time they spent assisting Class Counsel in contacting institutions:

Staff	Hours 2020
Stacy Hoffman	67.25
Matt Terry	41.25
Theresa Redfern	37.75
Total	146.25

4. *Hourly Rates.* The actual current rates charged to new clients for counsel at my firm are as follows: Mr. Spoonemore (\$750 an hour), Mr. Youtz (\$750 an hour), Ms. Hamburger (\$750 an hour), Ms. Merryfield (\$695 an hour) and Mr. Gross (\$695 an hour). All the attorneys at our firm have 30 years or more of experience: Mr. Youtz has been practicing for 46 years, I have been practicing for 32 years, Ms. Hamburger for 31 years, and Ms. Merryfield and Mr. Gross for 30 years. See generally, www.symslaw.com (“Our Attorneys”). Based on my experience, these rates are consistent with both local and national standards for experienced litigation counsel. See, e.g., *Lehman v. Nelson*, 2018 U.S. Dist. LEXIS 131954, at *3 (W.D. Wn., Aug. 6, 2018) (on remand, awarding \$665 for a

1 partner in 2018).¹ These rates are also consistent with the “Real Rate Report” compiled
 2 by Wolters Kluwer. See [www.wolterskluwer.com/en/solutions/enterprise-legal-](http://www.wolterskluwer.com/en/solutions/enterprise-legal-management/legalview-analytics/real-rate-report)
 3 [management/legalview-analytics/real-rate-report](http://www.wolterskluwer.com/en/solutions/enterprise-legal-management/legalview-analytics/real-rate-report). Attached hereto as *Exhibit 4* is a
 4 copy of the report’s analysis of real rates in the Seattle area. It indicates that in 2022, the
 5 median rate for a litigation partner was \$655/hour, and the third quartile rate was
 6 \$760/hour. With respect to our professional staff, they are billed at \$175/hour, which I
 7 believe is on the low end of rates in Seattle. See *Gnassi v. Del Toro*, 2023 U.S. Dist. LEXIS
 8 143728, *1 (W.D. Wn., August 16, 2023) (approving \$200 paralegal rate).

9 5. **Total Loadstar.** The total lodestar based on our normal hourly rates are as
 10 follows:

Timekeeper	Hourly Rate	Hours	Total
Chris Youtz	\$750	1106.80	\$830,100.00
Rick Spoonemore	\$750	1079.60	\$809,700.00
Ele Hamburger	\$750	145.5	\$109,125.00
Ann Merryfield	\$695	62.7	\$43,576.50
Daniel Gross	\$695	4.6	\$3,197.00
Stacy Hoffman	\$175	67.25	\$11,768.75
Matt Terry	\$175	41.25	\$7,218.75
Theresa Redfern	\$175	37.75	\$6,606.25
Total			\$1,821,292.25

22 6. **Total Litigation Costs.** The litigation costs necessary to successfully
 23 prosecute this action were enormous. The actual costs expended by the firm total
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25 _____
 26 ¹ Adjusted for inflation, \$665 in 2018 has the same buying power as \$800.61 in 2023. See <https://www.finatopia.com/calculator/inflation/665/2018>.

1 **\$1,087,753.69** and are set forth in the spreadsheet attached hereto as *Exhibit 2*. The
2 backup invoices are all attached, in alphabetical order, as *Exhibit 3*.

3 (a) *Initial Class Notice*. With a nationwide class approaching 3,000,000
4 people, providing initial class notice totaled \$740,290.48 (with the bulk of the expenses
5 due to the postage required to mail notices to hundreds of thousands of class members).
6 The amount paid to Epiq, the initial notice administrator, are the sum of the following:
7 \$188,562.32 paid on January 21, 2022, \$318,295.00 paid on January 31, 2022, and
8 \$233,333.16 paid on various dates in 2023. *See Exhs. 2 and 3*. In order to pay these costs,
9 my firm secured a special \$450,000 loan from Washington Trust Bank in 2022, in addition
10 to exhausting our existing line of credit with the bank. Both the special \$450,000 loan and
11 our line of credit are personally guaranteed by me and Ms. Hamburger. The interest
12 charges incurred by the firm have been included in the costs requested.

13 (b) *Settlement Notice and Administration*. We borrowed an additional
14 \$280,000 to make the initial deposit to Kroll, the settlement notice and claims
15 administrator. Kroll has estimated that the settlement notice and claims process will cost
16 approximately \$750,000.

17 (c) *Other Expenses*. In addition to the notice and claims process
18 expense, we also incurred the usual array of litigation expenses such as expert fees,
19 record request fees and charges, court reporters, and the like. These are all set forth in
20 *Exhibit 2*, with backup provided in *Exhibit 3*.

21 7. *Litigation Costs Requested*. To date, my firm has expended \$1,087,753.69
22 in costs. As part of the small *Keefe* settlement, we were reimbursed \$6,909.22 in costs. *See*
23 *Dkt. No. 180, p. 1* (awarding costs from *Keefe* settlement). That sum therefore needs to be
24 subtracted from our request. As a result, the total amount of costs sought to date totals
25 **\$1,080,844.47**.

1 8. *Risk Undertaken by the Firm.* We agreed to take this case in 2018 because
2 Keller Rohrback, the firm that had originally filed the case, wanted out. They were
3 looking to represent counties in the opioid litigation and were concerned about potential
4 conflicts. They had also failed to gain any traction on these cases. We had significant
5 concerns about this case when we reviewed it (with one partner at the time strongly
6 opposed to the representation due to its extreme risk). Specifically, in 2018, Keller
7 Rohrback and two other firms had just lost a functionally identical case on summary
8 judgment in Oregon. *See Brown v. Stored Value Cards*, 2016 U.S. Dist. LEXIS 113657, *4 (D.
9 Ore., August 25, 2016) (dismissing EFTA and § 1983 claims). In addition, at the same time
10 as we were considering assuming responsibility for this case, a court in California
11 compelled arbitration, killing the case as a class action. *Reyes v. JPay*, 2018 U.S. Dist.
12 LEXIS 237137 (C.D. Cal., June 26, 2018). And in this case, while Keller Rohrback had
13 defeated a motion to compel arbitration with respect to Mr. Reichert, in entering the
14 order the prior District Court Judge expressed skepticism that it would ever certify a
15 class here. *See* Dkt. No. 53, p. 5 (“It should be noted, however, that nothing before the
16 Court leads it to believe that a class action is the best way to deal with this dispute. ...
17 This is just a cautionary tale for now. The Court remains skeptical on the question of
18 class action.”). We nevertheless agreed to accept this case (and the *Brown* case) because
19 we believed that we could turn both cases around to right conduct that we came to firmly
20 believe violated the law. Due to the time commitment in attorney hours, as well as the
21 over \$1 million in costs advanced, partner draws were drastically reduced (and
22 eliminated for a significant period of time) in order to financially devote the necessary
23 resources to this case. Firm income over the last couple of years was drastically reduced,
24 as one would expect given the time commitment to this case.

1 9. *Recovery by Class Claimants.* As noted in my declaration dated
2 August 22, 2023 (Dkt. No. 212), we are projecting that all claimants will be paid three
3 times their actual loss, plus \$15, without any reduction, even after the payment of fees,
4 costs, and incentive awards. Dkt. No. 212, ¶6. This is confirmed by the number of claims
5 currently being submitted. As of today’s date, approximately 4,500 claims have been
6 received. The process is ongoing, but it is highly unlikely that 100,000 claims will be
7 received by December 4, 2023, the deadline. There will likely be millions of dollars
8 available for a *cy pres* distribution. In any event, since the claims process closes before
9 the fairness hearing, I will be able to confirm whether approved claims will be paid in
10 full before the Court determines whether to finally approve the settlement agreement
11 and the requested fees, costs, and incentive awards.

12 10. *The Class Representatives.* The named plaintiffs, Jeffrey Reichert and Gary
13 Moyer, have been model class representatives throughout this very long case. They have
14 each committed themselves to prosecuting this case over the six years of litigation
15 necessary to bring it to a conclusion. They were both deposed and had to produce
16 records and documents in response to discovery requests. Over the many years of this
17 litigation, they met and communicated with Class Counsel over multiple facets of this
18 case. They kept abreast of the progress of the case and its settlement, and asked questions
19 throughout the process. Critically, they were both willing to allow their situation to
20 become public, which is often a significant barrier to finding individuals willing to
21 represent these types of classes. Their perseverance has resulted in a massive recovery
22 for the class, with class members due to receive over three times their losses.

1 DATED: November 3, 2023, at Seattle, Washington.

2 /s/ Richard E. Spoonemore

3 Richard E. Spoonemore, WSBA #21833
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Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Jul 13/2018	CRY	Conference call with Keller Rohrback and Paul Wright regarding taking over lawsuit involving debit cards; review of order on arbitration	2.10
Jul 17/2018	CRY	Telephone call with Jeff Reichert regarding representing him in litigation involving prepaid debit cards from prisons; telephone call with Jeff's current counsel regarding same; preparation of notice of substitution	1.90
Jul 18/2018	CRY	Telephone calls and emails with Keller Rohrback regarding getting involved in case	0.80
Jul 19/2018	CRY	Determine task that need to be done, including [REDACTED]; begin review of existing casefiles regarding same; Withdrawal of counsel by Keller	2.50
Jul 20/2018	CRY	Further review of documents received from withdrawing counsel; prepare response on ESI disclosures	3.10
Jul 23/2018	CRY	Review of discovery requests served by defendants continue to review files; review of ESI disclosures from defendants	2.00
Jul 24/2018	CRY	Review order denying motion to strike affirmative defenses; telephone call regarding same with clients	0.70
Aug 4/2018	CRY	Work on responses to discovery requests to Jeff Reichert; further review of discovery received from defendants previously	2.10
Aug 10/2018	CRY	Order from court regarding pre-certification deadlines and expert disclosures; motion for class cert due January 18	0.60
Aug 14/2018	CRY	Conference regarding [REDACTED]; telephone calls regarding same; conference with Keller [REDACTED]; conference also with them regarding Keefe discovery	2.70
Aug 17/2018	CRY	Review of discovery submitted by defendants on thumb drive; conference with counsel regarding same	2.30
Aug 22/2018	CRY	Telephone calls with Jeff record regarding discovery responses; continue work on additional discovery requests made by defendants; telephone conference regarding [REDACTED]	4.20
Aug 23/2018	CRY	Continue work on responses to discovery requests from defendants	2.80
Aug 24/2018	CRY	Telephone call Jeff Reichert regarding response to requests	0.30

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Aug 29/2018	CRY	Obtain additional materials from Keller pertaining to Jeff Reichert's background and prior lawsuit for use in preparing responses to defendant's discovery requests; continue work on those responses	1.60
Aug 31/2018	CRY	Finalize and serve objections and responses to discovery requests from defendants	1.80
Sep 7/2018	CRY	Review documents obtained by [REDACTED] from public record disclosures regarding Kitsap County	2.40
Oct 8/2018	CRY	Discussions regarding possible settlement	0.80
Oct 9/2018	CRY	Telephone conference regarding settlement potential given recent dismissals in Oregon and California	0.80
Oct 22/2018	CRY	Telephone settlement conference with counsel for defendants	1.30
Oct 23/2018	CRY	Review of Keefe contracts for Grays Harbor County and Grant County; further review on additional research on debit cards used at other jails and facilities	2.20
Oct 31/2018	CRY	Conference with appellate counsel in Oregon Brown case for [REDACTED] [REDACTED]	1.20
Nov 20/2018	CRY	Review of class certification order in [REDACTED]	0.40
Dec 7/2018	CRY	Email exchanges and telephone call regarding potential settlement discussions	0.20
Dec 27/2018	CRY	Letter to Jeff Reichert regarding upcoming motion for class certification, discovery, and deposition scheduling, including deposition for him in February	0.60
Jan 8/2019	CRY	Work on class certification motion	4.10
Jan 9/2019	CRY	Additional research for class certification	3.70
Jan 10/2019	CRY	Telephone calls and other work regarding getting information regarding defendant's release card to other facilities to help support motion for class certification; telephone call re same	1.60
Jan 11/2019	CRY	Extensive document review of Keefe and Rapid contracts with other facilities across the country	2.70
Jan 12/2019	CRY	Working on class certification motion and declarations	4.10
Jan 13/2019	CRY	Email exchanges with Jeff Reichert regarding deposition and preparation	0.50

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Jan 14/2019	CRY	Review of more contracts and documents from [REDACTED] [REDACTED]; Email exchanges with opposing counsel to change confidential designation for documents for use in motion; further discussions regarding scheduling of depositions	2.20
Jan 15/2019	CRY	Preparation of motion for class certification and declarations; research regarding same	5.70
Jan 16/2019	CRY	Continued work on briefing and declarations for class certification	4.10
Jan 17/2019	CRY	Email regarding [REDACTED] [REDACTED]; research regarding same [REDACTED] [REDACTED]; continue work on drafting motion for class certification and declarations	5.10
Jan 18/2019	CRY	File motion for class certification; declaration of Jeff Reichert; declaration of Chris Youtz	6.20
Feb 5/2019	CRY	Conference Rick Spoonmore regarding Reichert deposition	0.50
Feb 15/2019	CRY	Quick review of response by defendants to motion to certify class	0.70
Feb 26/2019	CRY	Detailed review of briefs and declarations submitted by defendants in opposition to our motion for class certification; begin research on cases cited by defendants	2.80
Mar 1/2019	CRY	Research facts from declarations in response to our motion for class certification; further review and work up on reply brief	2.20
Mar 2/2019	CRY	Draft sections of reply brief	2.90
Mar 4/2019	CRY	Continued research on cases in defendant's response to motion for class certification	1.60
Mar 6/2019	AM	telephone conference with Chris Youtz regarding class certification motion; review motion papers	4.30
Mar 6/2019	CRY	Emails with Rick and Ann regarding brief; continued work on preparing reply brief in support of motion to certify class; conference call with Rick and Ann regarding brief	1.70
Mar 7/2019	AM	finish review of pleadings and key cases; long discussion with Chris Youtz	4.20
Mar 7/2019	RES	email defendants concerning motion to file single overlength brief on reply	0.10
Mar 7/2019	EH	review briefing and discovery on class certification; outline reply	2.00
Mar 7/2019	EH	confer with Rick Spoonmore and Ann Merryfield about the case	0.30

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Mar 7/2019	CRY	Continuing work on brief; conference call with Ann Merryfield regarding brief	2.30
Mar 8/2019	EH	draft reply for class certification; review factual record	4.40
Mar 8/2019	CRY	Continued work on brief	0.60
Mar 9/2019	RES	read and review Rapid Investments Opposition to class certification; read and review Keefe's Opposition to motion for class certification; begin research for reply brief; outline key issues for reply; outline narrowed class definitions	6.10
Mar 9/2019	CRY	Further research on brief	1.10
Mar 10/2019	RES	continue to research and work on response to defendants' two opposition briefs on class certification; review law on changing class definition; draft sections of brief	5.70
Mar 10/2019	EH	legal research related to class certification definition and claims in the case	4.40
Mar 10/2019	EH	draft and edit reply brief; email questions to other counsel about class definition	1.70
Mar 10/2019	CRY	Review drafts of brief; review of discovery to select exhibits for my declaration	2.30
Mar 11/2019	AM	draft motion, declaration, order to file overlength brief	0.60
Mar 11/2019	AM	work on takings issue for class certification motion	4.10
Mar 11/2019	RES	draft motion and order to file single consolidated brief; draft declaration in support; continue to work on brief	4.10
Mar 11/2019	EH	draft and edit reply brief on class certification; spot research for brief	5.50
Mar 11/2019	CRY	Continue review and editing of drafts of reply	0.80
Mar 12/2019	AM	research on ██████████ for class certification reply brief	5.40
Mar 12/2019	EH	review draft notice of appearance	0.10
Mar 12/2019	EH	confer with Rick Spoonemore, Ann Merryfield, Chris Youtz about ██████████ via email and in person	0.30
Mar 12/2019	EH	draft and edit reply brief; spot research on issues in the brief; review each opposition to address arguments	5.90
Mar 12/2019	CRY	Review of sections of brief prepared by Rick, Ele, and Ann; edit same; forward my analysis and writing of Ohio case and applicability to our motion to certify	1.60
Mar 13/2019	AM	research and inserts to class certification reply	6.80
Mar 13/2019	RES	continue to research and draft for brief	3.10
Mar 13/2019	EH	edit and revise reply brief	2.10
Mar 13/2019	CRY	Additional conferences with Ele and Rick regarding changing class definition; draft my declaration	0.70
Mar 14/2019	AM	continued research and draft inserts to class certification reply	7.00

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Mar 14/2019	RES	draft sections of brief; revise sections of brief; discuss same with Mr. Youtz	4.80
Mar 14/2019	EH	draft, edit and review reply briefing on class certification; prepare for filing	8.30
Mar 14/2019	CRY	Continue additions and revisions to reply brief in support of motion to certify class	0.80
Mar 15/2019	AM	review, revise reply brief and spot research	2.50
Mar 15/2019	RES	edit, revise and file reply in support of motion for class certification	4.00
Mar 15/2019	EH	email comparison reply brief to earlier version	0.30
Mar 15/2019	EH	edit and finalize reply brief	1.20
Mar 15/2019	CRY	Finalize reply brief in support of motion for class certification	1.50
Mar 19/2019	CRY	Review defendants' answers to interrogatories	1.60
Mar 25/2019	RES	read and review all prior briefing; pull and review dockets from similar cases	4.90
Mar 26/2019	RES	continue to review similar cases; pull all EFTA cases and review	3.10
May 8/2019	AM	review court's certification order; review documents produced by defendants	1.10
May 8/2019	RES	read, review and analyze Order granting and reserving motion to certify; read and review prior briefing for context; begin to research issues raised in Order	2.70
May 8/2019	CRY	Review order on motion for class certification; conference regarding same	0.70
May 9/2019	AM	research in response to Court's class certification order	5.00
May 9/2019	RES	continue to analyze order; begin extensive research on national uniformity issue raised by court; begin state-by-state analysis of potential theories of contract formation issues	8.10
May 10/2019	AM	continued research for class certification	4.20
May 10/2019	RES	continue research for motion for reconsideration/pre-hearing brief	3.80
May 13/2019	RES	continue to research for motion, create chart for state-by-state analysis; begin to fill in chart with authority; research other potential uniform issues on contract formation	6.80
May 13/2019	CRY	Email exchanges regarding obtaining additional class representative with HRDC to check their contacts	0.40
May 14/2019	AM	legal research and analysis for class certification brief	4.20
May 14/2019	RES	begin research on pre-emption issues related to EFTA; outline argument on pre-emption	7.60

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
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Date	Lwyr	Explanation	Hours
May 14/2019	CRY	Emails and telephone calls regarding [REDACTED]	0.60
May 15/2019	EH	emails to [REDACTED]	0.20
May 16/2019	EH	multiple emails with [REDACTED]	0.30
May 16/2019	RES	draft preemption argument regarding EFTA; continue state-by-state analysis	8.30
May 17/2019	AM	review draft brief on class certification and revise	0.90
May 17/2019	EH	multiple emails with [REDACTED]	0.10
May 17/2019	RES	research and draft section on EFTA standards and new case authority on scope of act; work in Humphrey decision in brief; draft joinder section and argument	5.90
May 17/2019	CRY	Email exchanges regarding adding additional class representative including discussions with support groups from recently released prisoners	0.80
May 18/2019	CRY	Review and edit motion for reconsideration and prehearing brief on mutual assent	2.90
May 20/2019	AM	revise section of post-certification brief dealing with contract law, and related legal research	4.20
May 20/2019	EH	emails with advocates about class rep	0.10
May 20/2019	RES	draft general mutual consent argument; continue to fill in state-by-state chart with case authorities; continue state-by-state research on standards related to contract formation	8.10
May 20/2019	CRY	Additional comments and edits on motion for reconsideration and on state law analysis	2.00
May 21/2019	AM	final review and revision of post-certification brief	0.60
May 21/2019	EH	edit draft supplemental brief on class certification	1.20
May 21/2019	RES	finish draft of brief; finish state-by-state chart; begin to edit and revise same	7.80
May 22/2019	RES	final edits to brief and file same	4.30
May 23/2019	CRY	Review order from court regarding schedule	0.20
May 25/2019	CRY	Review of prior pleadings and other materials for oral argument on class certification motion	1.60
May 26/2019	RES	begin to prepare for oral argument; draft handup outline	3.20
May 27/2019	RES	read and review Defendants' Class Certification Hearing Brief; work on responses to argument in brief for oral argument; outline same; general oral argument preparation	7.90
May 27/2019	CRY	Review submissions from defendants for class certification hearing; research and analysis and email regarding [REDACTED]	3.20

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
May 28/2019	EH	email [REDACTED] about class rep	0.10
May 28/2019	RES	prepare for argument; edit handup; to court for argument; note to file regarding hearing and certification of class	6.80
May 28/2019	CRY	Oral argument on remaining issues on class certification and certification of a national class	0.80
May 29/2019	EH	email with [REDACTED]	0.10
May 29/2019	RES	comprehensive review of all discovery responses and problems and issues with same; draft two letters asking for discovery conference and identifying topics, questions and responses to discuss; draft memo on damage analysis	8.70
May 29/2019	CRY	Emails with HRDC regarding additional facilities in Washington that use Rapid to attempt to locate additional class representative	0.70
May 31/2019	RES	review original complaint for potential amendment when new class representative is added; create list of requirements for new representative; review prior briefing to identify locations of potential effected persons	5.10
Jun 3/2019	RES	work on class notice issues; call to Epix regarding identification of class members with names and DOB, address and research postcard notice; list tasks and notice issues to complete	3.20
Jun 4/2019	RES	begin to create model of potential damages and recoveries, based on estimated size of class; pull material from discovery to create damage estimates; refine model based on internet search data on scope of debit cards and average fees	5.70
Jun 11/2019	RES	prepare for discovery call with all defendants; hold call; draft notes to file regarding call	2.10
Jun 11/2019	EH	email with [REDACTED]	0.60
Jun 19/2019	RES	work on [REDACTED]	1.50
Jun 20/2019	EH	call with potential named plaintiff; send follow up information to potential named plaintiff	1.00
Jun 24/2019	EH	email with potential client	0.10
Jun 25/2019	RES	research "issuer" for purposes of EFTA; research defendants and relationship between defendants and bank; research EFTA theories of liability against non-issuer defendants; draft memo re: same	5.60
Jun 25/2019	EH	email with criminal defense attorney about possible plaintiff	0.10
Jun 25/2019	CRY	Review proposed response to defendants regarding discovery conference; comment and revise same	0.70
Jun 26/2019	RES	public records request to SCORE re: debit card contracts	0.80

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
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Date	Lwyr	Explanation	Hours
Jul 1/2019	EH	email with [REDACTED]	0.10
Jul 2/2019	EH	email with defense attorney who referred a potential named plaintiff	0.20
Jul 2/2019	EH	email with [REDACTED]	0.10
Jul 3/2019	CRY	Emails and telephone calls regarding locating an additional class representative	0.40
Jul 8/2019	EH	email with [REDACTED]	0.10
Jul 8/2019	CRY	Email exchange with [REDACTED]	0.60
Jul 10/2019	EH	travel to and from Bremerton for presentation about Reichert case to [REDACTED]	5.00
Jul 10/2019	EH	draft handout for presentation	1.00
Jul 10/2019	CRY	Email exchanges and telephone calls regarding obtaining additional class representative; travel to Bremerton and meet with [REDACTED]	2.80
Jul 15/2019	EH	email [REDACTED]	0.10
Jul 17/2019	EH	provide information about potential named plaintiff to Rick Spoonemore; email advocates about possible named plaintiff	0.10
Jul 17/2019	RES	respond to calls regarding potential new class representative	0.90
Jul 18/2019	RES	draft letter and information page to send to potential new class representative	1.30
Jul 19/2019	RES	continue to work to identify additional class representative; search records	0.90
Jul 23/2019	RES	follow up on mailing; organize second round of mailing	1.10
Jul 25/2019	CRY	Email exchanges regarding Gary Moyer as potential class representative; telephone call regarding same; telephone call with Gary Moyer and preparation of retainer letter; forward to Gary to sign	2.00
Jul 26/2019	CRY	Additional research on Gary Moyer's background and arrest history and gathering of documents related to same; further emails regarding same	1.60
Jul 28/2019	RES	draft amended complaint; research legal theories for amended complaint and revise; draft motion to amend complaint; draft proposed order	6.90
Jul 29/2019	EH	email Tarra Simmons that new plaintiff was located	0.10
Jul 29/2019	RES	edits and revisions to motion and amended complaint; file same	0.50
Jul 29/2019	CRY	Review and revise proposed amended complaint	1.90

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Jul 30/2019	RES	draft letter to opposing counsel outlining discovery issues	0.70
Jul 30/2019	CRY	Conference regarding proposed letter on discovery issues; email regarding same	0.80
Jul 31/2019	CRY	Review letter regarding discovery	0.40
Aug 1/2019	CRY	Prepare email addressing the discovery issues and forward to counsel for defendants	0.50
Aug 5/2019	CRY	Review of Federal Registers for EFTA information	1.40
Aug 7/2019	CRY	Email to counsel regarding stipulation to amended complaint	0.30
Aug 8/2019	RES	draft consent to filing amended complaint; email to opposing counsel	0.50
Aug 8/2019	CRY	Review and revise amended complaint	0.80
Aug 9/2019	EH	review filing appealing class certification	0.30
Aug 9/2019	RES	read and review Keefe Petition to Ninth Circuit; read and review Rapid Petition to Ninth Circuit; emails to and from opposing counsel regarding stipulation; revise stipulation; file same; telephone conference with Mr. Youtz regarding Petitions	3.00
Aug 9/2019	CRY	Review of defendants request to the Ninth Circuit for permission to appeal order granting class certification; email comments regarding same	2.60
Aug 12/2019	RES	research for response to Ninth Circuit petitions; research deadlines and time for filing; review transcript and orders for effective date of order; research regarding same; outline response to petitions; draft consent to file amended complaint; email to and from opposing counsel regarding amended complaint	4.10
Aug 12/2019	CRY	Research on whether the petition to seek review of the class certification order is timely or not; email discussion regarding same	3.00
Aug 14/2019	CRY	Email to defendants regarding motion to strike their motion for Ninth Circuit review of class certification order because it is untimely	1.20
Aug 16/2019	CRY	Research and draft motion to strike	2.70
Aug 17/2019	CRY	Continue drafting motion to strike	4.10
Aug 18/2019	CRY	Further draft of motion to strike; send draft to Rick for comment	5.80
Aug 19/2019	EH	review and edit Reichert brief; email Chris Youtz and Rick Spoonemore with edits	1.00
Aug 19/2019	RES	read, review and edit motion to strike petitions	1.10

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Aug 19/2019	CRY	Prepare email with comments to Ele regarding her suggested changes to motion; finalize and file motion to strike and supporting declaration	4.60
Aug 20/2019	RES	continue to research and outline response to petitions	0.90
Aug 22/2019	CRY	Additional emails to defendants regarding outstanding discovery	0.30
Aug 23/2019	RES	read and review motion to compel arbitration filed by Rapid and Cache; outline key issues for response; read and review motion to compel arbitration filed by Keefe	5.10
Aug 23/2019	RES	read and review answers filed by defendants; cross reference admissions	0.80
Aug 23/2019	CRY	Review motions to compel filed by both defendants and supporting materials; review of answers submitted by Rapid response to amended complaint	4.80
Aug 26/2019	RES	outline response to Keefe's motion to compel arbitration; review prior order and prior briefing related to motion to compel arbitration of Reichert, pull key sections and arguments from same	3.10
Aug 26/2019	CRY	Email exchanges regarding additional plaintiff	0.80
Aug 28/2019	RES	extensive work on response to Rapid's motion to compel arbitration; begin to draft response to same; research for same	6.20
Aug 29/2019	RES	continue to work on response to motion to compel arbitration; draft facts; quote key sections from court's prior order; update research, new Supreme Court decision	5.20
Aug 29/2019	CRY	Preparation for discovery conference with defendants; conference Rick spend more several emails regarding prior discussions; set up conference	0.90
Aug 30/2019	RES	work on public records requests;	0.00
Aug 30/2019	RES	review discovery; discuss with Mr. Youtz; discovery call with defendants; begin to draft public disclosure requests using defendants' list	5.20
Aug 30/2019	CRY	Discovery conference call with defendants; review of opposition from defendants in Ninth Circuit to motion to strike; begin preparation of reply brief	8.20
Sep 1/2019	CRY	Further work on reply brief on motion to strike	2.70
Sep 2/2019	CRY	Continue work on reply motion for motion to strike	5.20
Sep 3/2019	CRY	Online research for reply brief; continue drafting a brief	6.20
Sep 4/2019	CRY	Review additional disclosures made by defendants; additional research on reply brief; continue drafting of brief	7.50
Sep 5/2019	CRY	Finalize and file reply brief in support of motion to strike	9.60

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Sep 9/2019	RES	review updated list from Keefe on institution processes	0.50
Sep 9/2019	CRY	Review facility list submitted by Keefe; email regarding same	0.70
Sep 10/2019	CRY	Additional emails and conferences regarding discovery responses and class definition; drafting of public record disclosures to be sent to facilities to deal with choices available to inmates to receive money back; email and telephone call with HRDC regarding their prior public record request; review of records for Grays Harbor County sent by HRDC	2.80
Sep 12/2019	RES	extensive work on drafting and editing brief in response to motions to compel arbitration	7.10
Sep 13/2019	DSG	research and draft memo on consumer protective value of opt-in procedures	3.80
Sep 13/2019	RES	continue to draft and revise brief in opposition to motions to compel arbitration	4.60
Sep 13/2019	CRY	Review response from public records request to certain Florida jails regarding Rapid	0.40
Sep 16/2019	AM	review and revise opposition to arbitration motion; discuss potential amendment of class definition with C. Youtz	1.40
Sep 16/2019	RES	final edits and revisions to opposition to motions to compel arbitration; file same	5.10
Sep 16/2019	CRY	Review and revise our response to defendants motion to compel arbitration; email with HRDC regarding additional information available from other facilities; email to Rick regarding potential additional addition to brief	3.10
Sep 17/2019	CRY	Lengthy email to defendants regarding stipulation to small amendment to complaint and discussion regarding failure to provide discovery; telephone call and email with officials at Grays Harbor County regarding whether they offer an alternative to a release card	1.60
Sep 18/2019	CRY	Additional email exchange with Grays Harbor County regarding documents pertaining to prepaid debit cards and alternatives; review order from Ninth Circuit denying petition for permission to appeal class certification order	1.80
Sep 19/2019	RES	review email from opposing counsel regarding Washington facilities, search to confirm accuracy of representations; research on scope of class dispute	2.10

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Sep 19/2019	CRY	Lengthy email exchanges with defendants regarding dispute over definition of class and whether discovery should be provided unless facilities are shown not to provide a choice of how to receive money; research regarding this plus general research to do public record request to facilities regarding their programs	7.30
Sep 20/2019	RES	read, review and analyze Keefe's reply in support of motion to compel arbitration of claims; read key cases cited in reply; read and review Rapid's reply; outline issues in both replies for potential oral argument	3.80
Sep 20/2019	CRY	Email to defendants counsel regarding filing of motion to compel rather than informal oral argument with court on outstanding discovery responses; requests from defendants for information on Moyer for use in records request to Kitsap County jail; review of reply memoranda submitted by defendants on motion to compel arbitration	5.10
Sep 22/2019	CRY	Draft public record request to facilities defendants claim offer a choice and how money is returned; research for information on applicable laws for those facilities and contacts	5.10
Sep 23/2019	RES	conference with Mr. Youtz regarding Grays Harbor procedures	0.70
Sep 23/2019	CRY	Email from defendants regarding approach to motion to compel discovery	0.80
Sep 24/2019	CRY	Begin working on motion to compel and gathering pleadings and other materials in support	4.30
Sep 25/2019	CRY	Continuing work on motion to compel	3.00
Sep 26/2019	RES	review material found by Michelle Dillion regarding institutions that used Rapid and ?Cache Valley	0.30
Sep 26/2019	CRY	Begin review of documents for other facilities from Florida and California to determine their procedures and whether they offer a choice; supplemental production from Rapid; emails to defendants regarding inadequate production	2.60
Sep 27/2019	CRY	Review of contracts and other documentation for facilities in Texas and California	1.90
Sep 28/2019	CRY	Continue drafting of motion to compel	2.70
Sep 29/2019	CRY	Prepare and send records request to Northumberland County jail	1.30
Sep 30/2019	CRY	Responses regarding some of the public record request; email exchange with defense counsel regarding information to be provided, including addresses	2.10
Oct 1/2019	CRY	Email regarding San Francisco County facility	0.20

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Oct 2/2019	CRY	Review documents received regarding Tulare County jail; email to defense counsel regarding why facilities we have found with their cards are mentioned in their discovery	0.80
Oct 3/2019	CRY	Prepare joint submission for motion to compel issues and my declaration and exhibits	5.20
Oct 4/2019	CRY	Further revisions to joint summation and my declaration before forwarding to defendants; lengthy email to defendants regarding outstanding discovery requests and are public record disclosures requests; further discussion regarding joint submission and how it works	2.70
Oct 6/2019	CRY	Preparation of 22-page proposed order on motion to compel discovery	3.60
Oct 7/2019	CRY	Review production of discovery from defendants; send joint motion to compel motion to defendants for them to insert their arguments; forward declaration and exhibits to defendants in connection with same; emails regarding same	5.20
Oct 8/2019	CRY	Review additional documents received from public record disclosures; receive additional document production from Rapid; review same	2.70
Oct 9/2019	CRY	Review additional documents received from public record disclosures	1.30
Oct 12/2019	CRY	Email exchanges with Paul Wright regarding visit to discuss case	0.30
Oct 14/2019	CRY	Receive and review defendants insertions for joint submission on motion to compel	0.80
Oct 16/2019	CRY	meeting with Paul Wright; research on facilities; draft portion of reply on motion to compel; review responses to record requests	8.60
Oct 16/2019	CRY	Review public record requests for Minnesota facilities Rapid claims offer a choice; email with record supervisor regarding same	2.10
Oct 17/2019	CRY	Review additional documents received from public record disclosures for Dalton County; further added and finalize reply portion of joint submission on motion to compel	2.60
Oct 18/2019	CRY	Organize and file joint submission on motion to compel	1.40
Oct 23/2019	CRY	Prepare and file objection to praecipe from defendant Rapid to substitute exhibit and declaration submitted in joint submission on motion to compel	3.40
Oct 27/2019	CRY	Review of Pennsylvania law regarding right-to-know law and make requests to Northumberland County jail	1.70

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Oct 29/2019	CRY	Review additional documents received from public record disclosures for Manatee County	0.80
Oct 30/2019	EH	review Order from the Court	0.20
Oct 30/2019	RES	read and review order denying motion to compel arbitration	0.40
Oct 30/2019	CRY	Review order denying motion to compel arbitration	0.20
Nov 6/2019	CRY	Review supplemental discovery responses from defendants	1.40
Nov 18/2019	CRY	review of order on discovery; telephone call re same; review individual requests	0.70
Nov 18/2019	CRY	Review order from court on motion to compel; telephone calls regarding same; review individual requests	0.70
Nov 18/2019	RES	read and review order compelling discovery; conference with Mr. Youtz re: same	0.70
Nov 19/2019	CRY	Email to counsel for defendants regarding order on motion to compel and when discovery will be provided	0.30
Nov 26/2019	CRY	Computer research on appeal filed by Rapid and Cache; telephone calls with Rick Spoonemore regarding same; additional computer searches for cases involving denials of motions to compel	2.10
Nov 27/2019	CRY	Preparation of stipulation on discovery; review of prior discovery deadlines and emails regarding same; prepare email to opposing counsel regarding production of discovery; review of additional information regarding prisons; additional research on appeal of denial of motion to arbitrate; review Keefe's notice of appeal and related papers including schedule from Ninth Circuit; email regarding same	2.50
Dec 2/2019	CRY	Review order regarding appeal and deadlines; forward proposed order regarding schedule for production from defendants	1.10
Dec 3/2019	CRY	Email exchanges regarding proposed order from defendants; review and modify mediation statement; additional email exchanges regarding	1.60
Dec 4/2019	CRY	Review of additional mediation statements submitted by defendants; continue discussions with defendants regarding production of documents and having conference call with court to discuss when documents ordered by court shall be produced; continue working on public disclosure request to obtain information from out-of-state facilities	2.50

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Dec 5/2019	CRY	Several email exchanges regarding conference to resolve production of documents date and other issues	0.80
Dec 6/2019	CRY	Additional email exchanges regarding setting up conference of court and conference with counsel prior to that	0.90
Dec 9/2019	CRY	Conference call with counsel for Rapid regarding disclosures of additional facilities, production of documents, and other discovery issues; review of documents previously produced by Rapid to check on completeness of prior production	2.00
Dec 10/2019	CRY	Work on public records request to several facilities; online search for requirements for requests in various states	2.70
Dec 12/2019	CRY	Review of data production made by Rapid; review of PDR request response from Clark County; emails regarding document production and data	3.40
Dec 13/2019	RES	review scope of production and documents that arrived yesterday	1.40
Dec 13/2019	CRY	Email with counsel for Rapid regarding future productions of data; continued review of data for facilities in first round of data production to determine how data works	2.90
Dec 19/2019	CRY	Receive additional round of data from Rapid for 80 facilities; investigate problems with file sent by Rapid; email to counsel for rapid regarding same; email to counsel for Rapid regarding same including need for addresses; further public disclosure requests in other states for data from facilities	0.70
Dec 20/2019	CRY	Receive correct data file from Rapid and review same; email regarding address is missing; additional work on data	2.60
Dec 27/2019	CRY	Work on analyzing data from first two productions and review of responses to public records request	2.80
Jan 3/2020	RES	Review new production from Rapid	0.70
Jan 6/2020	RES	review new production of documents from Rapid	2.30
Jan 6/2020	CRY	Review of additional data from defendants; emails regarding same	3.50
Jan 16/2020	RES	continue review of Rapid document production stamped 265-3069	6.40
Jan 17/2020	RES	Continue review of document production 265-3069; notes to file re same	7.20
Jan 20/2020	RES	Document review/Rapid and Cache	4.30
Jan 21/2020	RES	read and review Rapid's supplemental answers; review document production	5.20

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Jan 22/2020	RES	Read and review Cache Valley's responses to discovery and updated production	7.10
Jan 23/2020	RES	Document review, notes on same	5.30
Jan 24/2020	RES	Review new production from Rapid/Cache, 3070 to 3163; discuss issues with production with Mr. Youtz	4.30
Jan 28/2020	RES	prepare for discovery meet and confer; meeting with Mr. Youtz; conference with opposing counsel on status of discovery	2.10
Jan 30/2020	RES	Read/review email from opposing counsel regarding discovery issues and production; discuss same with Mr. Youtz	0.60
Feb 5/2020	CRY	Exchange of text messages to Jeff Reichert regarding conference call	0.30
Feb 7/2020	RES	Work on discovery issues and problems; review Mr. Youtz email re same to opposing counsel, continue to identify problems with production from defendants	3.50
Feb 12/2020	RES	Read response from opposing counsel of discovery disputes; note to file	0.70
Feb 14/2020	RES	Receive and review production of 3173 to 3326 from Rapid/Cache; note issues in production	2.70
Feb 17/2020	RES	Continue to review and analyze discovery and production; create key document folder and begin to collect same from files	6.70
Feb 18/2020	RES	Conclude document review and identify follow-up requests and interrogatories, outline potential depositions	4.20
Mar 4/2020	CRY	Review of discovery received while on vacation; conference regarding status of case	4.00
Mar 5/2020	CRY	Review designations of records submitted by Rapid; brief review of Rapid's opening brief	3.20
Mar 5/2020	RES	Read, review and outline Rapid/Cache's Opening 9th Circuit brief; draft notes on issues for response; outline research tasks	2.10
Mar 6/2020	CRY	Review of briefs submitted by Keefe; additional review and organization of data being received from Rapid	4.00
Mar 6/2020	RES	Read and outline Keefe's opening 9th Circuit brief	1.30
Mar 7/2020	RES	Review ER from brief; outline response	0.40
Mar 8/2020	CRY	Review of lists of facilities and other information to organize multistate records requests to all of the defendants facilities; draft proposed request to facilities; begin reviews of state disclosure laws regarding same	8.40
Mar 9/2020	CRY	Begin preparation and planning of database; review of spreadsheets and transfer for initial data analysis	5.70

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Mar 9/2020	EH	review discovery; draft subpoena duces tecum and Exhibit A; email to Chris Youtz for review	2.40
Mar 10/2020	CRY	Update on docket and filings in Ohio case; emails regarding same; review of proposed subpoena to facilities regarding release procedures and debit cards; continue to plow through several hundred thousand data entries and work on transferring to database; review of additional documents submitted in addition to data	6.20
Mar 10/2020	EH	revise and edit subpoena duces tecum and draft cover letter for jail; email to Rick Spoonemore and Chris Youtz for review	1.20
Mar 11/2020	CRY	Continued review of data and discovery	4.50
Mar 12/2020	CRY	Email to counsel for Rapid regarding data discrepancies discovered to date; continued review of data for integrity and transfer to database; emails with Paul Wright regarding Ohio case; review of settlement documentation in Ohio case; emails regarding same; work to determine the proper agent codes for 986 facilities based on data received from Rapid	6.10
Mar 13/2020	AM	review Ninth Circuit decision	0.30
Mar 13/2020	CRY	Continued work on data; review and revise proposed request to jails for documents; further emails and discussion regarding same	5.30
Mar 16/2020	CRY	Keep working through data and preparation of database; review of briefs and review of some cases cited by defendant rapid and appellate briefs; start working on response to same; review of Ninth Circuit opinion in Brown; several emails regarding same; review of docket in Brown case regarding status of class certification and other issues; additional review of dockets of Brown and Humphreys case; email exchanges regarding conflict of classes because of settlement	7.30
Mar 16/2020	EH	review recent 9th Circuit decision in similar Oregon case; email with Rick Spoonemore and Chris Youtz about case	0.60
Mar 17/2020	CRY	Problems with scope of data production from Rapid; emails regarding same; continue plowing through data; review of provided data production request because of prior issues discovered; email with counsel for Rapid regarding same; review of briefs filed on appeal and assignments to do legal assistance for gathering cases cited in organizing same; brief review of circuit rules regarding briefs	6.10

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Mar 18/2020	CRY	Work on appellate briefs and continue work analyzing and filtering data for use in database and analysis of case; revised draft of public disclosure requests for paralegal to use; conferences regarding Oregon case and possible involvement in that case involving NUMI cards	5.80
Mar 19/2020	CRY	Data analysis and discovery; emails regarding conference on Court of Appeals decision	4.70
Mar 20/2020	CRY	Conference call with HRDC counsel; continued work on database	5.20
Mar 23/2020	CRY	Prepare programs for transfer from 900+ spreadsheets into form suitable for importing into Access database; prepare memo regarding litigation in Ohio and Oregon on debit card cases; review of dockets in both cases regarding same	4.90
Mar 26/2020	CRY	Emails regarding group meeting of staff to become involved in sending out public record requests to facilities; revise the request; prepare memo to staff on the steps and processes for handling these requests and receipts; set up files and email systems for handling requests and receipts of materials; also set up system for searching for websites for the facilities to collect information regarding prisoner releases	5.80
Mar 27/2020	CRY	Assigned facilities to staff members; field questions on how to handle various forms from the states and the state law regarding the request; establish spreadsheet to monitor all facilities request status and processing; memo to staff regarding updating spreadsheet on network regarding requests	3.10
Mar 29/2020	CRY	Work on responding to defendant's opening brief on arbitration appeal	4.80
Mar 30/2020	CRY	Continuing oversight and follow-up on public record requests; Respond to inquiries from staff and sort out inconsistencies with the defendants identification of the facilities; review of spreadsheet entries and discussion with staff regarding same	2.20
Apr 2/2020	CRY	Telephone calls with Sheriff's departments regarding letter alternative to document response; prepare letters; emails regarding same	2.60
Apr 3/2020	CRY	Telephone calls and email responses with County Sheriff's departments for various facilities regarding records request an alternative by sending letter describing procedures used for release funds	2.80

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Apr 6/2020	CRY	Telephone calls and emails regarding public records requests to facilities nationwide; emails with staff regarding processing of materials and reaching out to other facilities	5.10
Apr 7/2020	CRY	Email defense counsel regarding problems with spreadsheets updated they sent us; additional communications regarding documents requested from facilities	2.70
Apr 9/2020	CRY	Additional telephone calls and emails with facilities regarding requests	1.50
Apr 10/2020	CRY	Revise proposed letter for County Sheriff's to sign in lieu of producing documents; brief research on admissibility of the statements at trial; email to attorneys in office for thoughts on same	1.60
Apr 13/2020	CRY	Revise form of requests being sent to facilities to include letter option; email to staff regarding same; check on status of existing requests; make new assignments of states; telephone calls and emails with recipients of record requests	3.80
Apr 14/2020	EH	email contacts to locate cooperating attorneys in AL AR, TN, and VA	0.20
Apr 14/2020	CRY	Telephone calls and emails with facilities and departments handling the public record requests; address issues for states that do not allow nonresidents to submit public record disclosure requests; search for attorneys who can handle this on our behalf; email Ele and Rick regarding same	3.70
Apr 15/2020	CRY	Telephone calls and emails with facilities and departments handling the public record requests	2.50
Apr 16/2020	CRY	Telephone calls and emails with facilities and departments handling the public record requests	1.90
Apr 17/2020	CRY	Telephone calls and emails with facilities and departments handling the public record requests; work on response for appeal	1.60
Apr 20/2020	EH	multiple emails to cooperating attorneys to send out public records requests	0.50

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Apr 20/2020	CRY	Drafting the brief in response to defendants appeal of order denying arbitration; Telephone calls and emails with facilities and departments handling the public record requests; email with defendants regarding problems with data in their spreadsheets provided as discovery; conferences regarding obtaining attorneys in states requiring residents to make PRD requests	8.70
Apr 21/2020	EH	draft and send emails to counsel regarding assistance with public records request; respond to emails; participate in a call with one counsel; send follow up email	1.00
Apr 21/2020	CRY	Telephone calls and emails with facilities and departments handling the public record requests; telephone conference with attorney for handling southern states document requests; conference regarding document requests and letters from Sheriff's departments	5.10
Apr 22/2020	EH	multiple emails with possible attorneys in VA and AR to assist with public records requests; call with attorney in VA; send follow up email to attorney in VA with sample letter	1.50
Apr 22/2020	CRY	Telephone calls and emails with facilities and departments handling the public record requests	3.00
Apr 23/2020	CRY	Telephone calls and emails with facilities and departments handling the public record requests; Conference regarding attorney in Arkansas to handle requests; check spreadsheets regarding status of requests, emails regarding same; work on appellate brief including research on cases cited by defendants	9.10
Apr 24/2020	EH	call with cooperating attorney in AR about public records requests; email sample request to attorney	1.00
Apr 24/2020	CRY	Further work on brief and research regarding contract issues; review of state statutes regarding information requests for Michigan; conference regarding how to make request to city of Detroit; many telephone calls and emails with facilities and departments handling the public record requests	7.30
Apr 25/2020	CRY	Research and drafting brief responding to appeal	4.70
Apr 27/2020	CRY	Numerous telephone calls and emails with facilities and departments handling the public record requests; conference with staff regarding follow-up with Texas facilities who have not timely responded; review of Texas law regarding obligation to reply	6.30

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Apr 28/2020	CRY	Continue work on appellate briefs; telephone calls and emails with facilities and departments handling the public record requests	5.90
Apr 29/2020	CRY	Continue work on appellate briefs; telephone calls and emails with facilities and departments handling the public record requests	6.70
Apr 30/2020	CRY	Continue work on appellate briefs; telephone calls and emails with facilities and departments handling the public record requests	5.30
May 1/2020	CRY	Work on appellate briefs for the Reichert and Keefe appeals; continue to field calls and emails from county administrators and sheriff offices regarding document requests	4.90
May 2/2020	CRY	Drafting responses to appellate briefs for the Reichert and Keefe appeals	7.20
May 3/2020	CRY	Drafting responses to appellate briefs for the Reichert and Keefe appeals	6.90
May 4/2020	AM	review and comment on excerpt of draft brief	0.20
May 4/2020	RES	Review and edit responsive 9th Cir. brief	3.40
May 4/2020	CRY	Drafting responses to appellate briefs for the Reichert and Keefe appeals; Send draft of argument on lack of consideration to Rick for comment and review	8.40
May 5/2020	CRY	Email and telephone calls with jail administrators and others regarding public record requests; editing of both the Keefe and Rapid briefs	7.10
May 6/2020	RES	Edit, review and revise 9th Cir. brief	4.20
May 6/2020	CRY	Finalize and file briefs in Keefe appeal and in Rapid appeal	9.20
May 7/2020	CRY	Continue with emails and phone calls with jail administrators; review of responses to document requests;	3.80
May 8/2020	CRY	Continue with public disclosure requests particularly with Texas facilities who have not responded; field emails and telephone calls from other facilities; review files and spreadsheet regarding information received	2.60
May 11/2020	CRY	Telephone calls and emails with facilities and departments handling the public record requests	1.20
May 13/2020	CRY	Telephone calls and emails with facilities and departments handling the public record requests; review of materials received	2.30
May 14/2020	RES	Review Rapid's discovery requests to Mr. Moyer; calendar responses; outline material necessary to respond; outline objections	4.10

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
May 14/2020	CRY	Review of discovery requests directed to Gary Moyer; telephone calls and emails with facilities regarding record requests; review documents regarding same	2.10
May 15/2020	RES	Review Keefe's discovery requests to Mr. Moyer; calendar same; outline responses and compare to Rapid's requests, note objections; read and review first RFA to Mr. Moyer, note objections and problems with requests	3.10
May 15/2020	CRY	Emails regarding discovery directed to Gary Moyer; email exchanges with Gary regarding responses; review information received from records requests	2.90
May 17/2020	CRY	Complete forms obtained on the Internet and email to facilities for public record disclosures	0.80
May 18/2020	CRY	Continue exchanging emails and telephone calls with facilities regarding public disclosure requests; review of information obtained	2.70
May 19/2020	CRY	Deal with numerous responses on next round of document requests from facilities, including telephone calls and email exchanges with administrative personnel at these facilities; Emails and phone calls to Gary Moyer regarding responding to discovery requests	6.30
May 20/2020	CRY	telephone call attempts to Moyer; emails and telephone calls from jails regarding document requests; conferences with staff regarding document requests; updating database and assignment sheet; emails regarding status report; email regarding class notice; draft proposed status report; review information received from jail in Arkansas; no assignments for states on document review comments on status report respond to email from jail update assignment list	8.20
May 21/2020	CRY	Review emails regarding data requests; review of contracts with facilities; telephone calls with jailers; contacts with Moyer regarding discovery requests; emails regarding same; responding to emails for records requests; conferences with local counsel for Tennessee and Arkansas all regarding records request; database work	8.60
May 22/2020	CRY	Telephone calls with Gary Moyer for information regarding discovery responses; continue handling communications with jail administrators regarding document production	5.80
May 25/2020	CRY	Dealing with public record disclosure requests	0.80
May 26/2020	CRY	Email, telephone call with Gary Moyer regarding discovery	1.20

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
May 27/2020	CRY	Email exchange with attorney handling responses in Arkansas; dealing with record request; telephone conference Gary Moyer for information; email from counsel for defendants regarding consolidation of appeals	2.10
May 28/2020	CRY	Conversations with counsel for Tennessee and Alabama document requests and suggested wording of requests	0.60
Jun 1/2020	CRY	Discussion regarding providing class notice after arbitration issue is resolved; review of estimated costs obtained by Rick; communications with facilities regarding public record requests ongoing; work on response to discovery requests to Gary Moyer	2.30
Jun 2/2020	CRY	Public record disclosure requests work	1.60
Jun 3/2020	CRY	Internet search and public records search for information about Gary Moyer to discuss with him regarding response to discovery requests; continued review and contact with facilities on public record disclosures	2.30
Jun 4/2020	CRY	Telephone call and emails regarding Virginia facilities; contact Virginia counsel regarding same	0.60
Jun 5/2020	CRY	Prepare memo/email regarding thoughts on class notice; review of database to work on addresses to see what how many might be usable; additional contact with facilities regarding document requests	1.90
Jun 7/2020	RES	Work on responses to Rapid's 1st interrogatories to Mr. Moyer; draft and edit same	2.80
Jun 8/2020	RES	Work on responses to Keefe's discovery to Mr. Moyer	1.50
Jun 9/2020	CRY	Continue drafting of responses to interrogatories from defendants; email to Gary Moyer regarding same for additional information; conference with staff regarding revisiting Texas facilities to obtain responses; review of materials received from other facilities; telephone call with facility administrator	2.80
Jun 10/2020	CRY	Complete discovery responses and forward to Gary Moyer for review and signature	1.60
Jun 11/2020	CRY	Several email exchanges regarding document requests with Texas facilities; finalize and serve responses to Rapid's and Keefe's interrogatories, requests for admissions, and request for production of documents	3.40
Jun 15/2020	CRY	Email exchanges and review of files regarding request to Texas facility	0.40

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Jun 17/2020	CRY	Contact with counsel to serve as attorney for us in Alabama for public disclosure requests; telephone call and email explaining the process and providing him the materials; discussion of background of case and other information helpful to him;	1.20
Jun 22/2020	CRY	Review additional materials received from public record requests; email to defense counsel with signature pages for discovery	0.30
Jun 23/2020	CRY	Email exchange with Lee County Sheriff regarding providing letter in lieu of document search	0.20
Jun 26/2020	RES	Read and review Rapid's 9th Cir. Reply brief, notes to file	1.80
Jun 26/2020	CRY	Review reply briefs submitted by defendants in appeal; email regarding same	1.20
Jul 9/2020	CRY	Major follow up with facilities who have not responded to our requests; several telephone calls with administrators and email exchanges	2.80
Jul 10/2020	CRY	Additional telephone calls with administrators about responding to document requests or providing us a letter describing the process they followed for returning money	1.40
Jul 13/2020	CRY	Obtaining additional letters from facilities regarding how they handle release of funds when inmates are released; several telephone calls and emails regarding same	2.60
Jul 16/2020	CRY	Additional responses to public records requests	0.50
Jul 21/2020	CRY	Review of materials recently received from public records requests	0.80
Jul 29/2020	CRY	Email exchange with facility regarding response	0.30
Aug 10/2020	AM	review appellate briefs and note areas of concern	4.00
Aug 10/2020	CRY	Follow up with city of Las Vegas regarding an overdue response	0.20
Aug 11/2020	AM	draft areas of concern and focus for argument	1.70
Aug 12/2020	CRY	Prepare list of non-responding facilities and forward to staff for contacting; contact with attorney handling Tennessee and Alabama submissions to follow up on those as well	1.40
Aug 13/2020	CRY	Several emails and phone calls from facilities who are delinquent in providing responses	2.20
Aug 17/2020	CRY	Review of additional submissions made on public records requests; Order from Ninth Circuit that oral argument will not be held in decision will be made on the briefs	0.50
Aug 18/2020	CRY	Email follow-up question two jail administrator regarding records forwarded to us and the information we need	0.30

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Aug 24/2020	CRY	Review information regarding the panel who will consider the appeal; review of prior arbitration cases handled by them; email regarding same	0.70
Sep 16/2020	CRY	Review additional responses to public record requests	0.40
Oct 21/2020	RES	Review 9th Circuit decision, discuss same with Mr. Youtz	1.30
Oct 21/2020	CRY	Review decision from Ninth Circuit Court of Appeals; emails regarding same; email to opposing counsel regarding scheduling	0.60
Oct 29/2020	RES	Prepare for conference; conference with Mr. Youtz; conference with opposing counsel and multiple issues, discovery, motions, schedule, etc.	2.50
Oct 29/2020	CRY	Conference with opposing counsel regarding scheduling and next steps to resolve arbitration issue	0.80
Nov 11/2020	RES	Review letter from opposing counsel; review schedule; call with Mr. Youtz	0.20
Nov 12/2020	CRY	Check mandate; email regarding status	0.50
Nov 13/2020	CRY	Email regarding litigation; communications with opposing counsel regarding amended complaint and mandate from Ninth Circuit Court of Appeals	0.50
Nov 18/2020	CRY	Email exchange with George Verschelden regarding next steps, including amending complaint, declaration from Moyer, and possible deposition	0.40
Nov 30/2020	CRY	Review and edit proposed second amended complaint; email to defendants to determine if they will stipulate to filing	0.90
Dec 11/2020	CRY	Begin drafting declaration for Gary Moyer that will be used to oppose arbitration	0.80
Dec 15/2020	RES	Draft consent to file amended complaint	0.80
Dec 15/2020	CRY	Finalize second amended complaint; send consent to file to defendants; draft declaration for Gary Moyer, including exhibits; send to Moyer	1.50
Dec 16/2020	CRY	Make changes to consent to file, resend to defendants	0.40
Dec 17/2020	CRY	Declaration from Gary Moyer; emails regarding same	0.30
Dec 18/2020	RES	Substantial research for amending the complaint; review and research new causes of action; redline old complaint to identify problems and issues; review discovery and public information for amendment	7.20
Dec 21/2020	RES	Outline amended complaint and begin to draft same;	8.20
Dec 22/2020	RES	Revise and draft amended complaint, explore new EFTA causes of action, research on same	4.90
Dec 22/2020	CRY	Email to defendants regarding consent to file and attaching declaration of Moyer	0.30

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Dec 23/2020	RES	Finalize amended complaint, notes to file on changes and key allegations, file same	5.20
Dec 23/2020	CRY	File consent and second amended complaint	0.30
Jan 4/2021	CRY	Email exchanges with George Verschelden regarding discovery from Moyer	0.60
Jan 6/2021	CRY	Additional emails regarding extension of time to file motion and answer	0.80
Jan 11/2021	CRY	Email exchanges to set up deposition of Gary Moyer; email to Gary with procedures for preparing for deposition including video on deposition preparation	0.80
Jan 18/2021	CRY	Review of documents to prepare Moyer for deposition; preparation session with Gary Moyer for deposition	8.00
Jan 19/2021	CRY	Additional preparation for deposition and review of prior submissions on arbitration issues; communication with Gary Moyer regarding deposition	2.50
Jan 20/2021	CRY	Additional communications with Gary Moyer regarding deposition; Defend Gary Moyer a deposition; follow-up phone calls with Rick Spoonemore; additional calls with Gary Moyer	9.30
Jan 20/2021	RES	Conference with client (all Zoom); conference with Mr. Youtz; attend deposition of Mr. Moyer; conference with Mr. Youtz; draft note to file on deposition issues and questions	6.10
Feb 10/2021	CRY	Review of deposition	0.60
Feb 12/2021	CRY	Review of motions compel plaintiff Moyer to arbitrate his claims	1.20
Feb 12/2021	RES	Review answers to amended complaint; begin review of motions to compel arbitration; outline notes to file on response	6.90
Feb 13/2021	RES	Extensive review of motions and answer filed yesterday; begin to prepare responses; outline same; discuss same with Mr. Youtz	8.50
Feb 14/2021	CRY	Begin review of cases cited by defendants in support of their motions to compel arbitration; additional legal research; review of prior briefing	5.10
Feb 16/2021	CRY	Work on response to motions to compel arbitration, including review of cases and additional research	4.00
Feb 16/2021	RES	Work with Mr. Youtz on response to motion to compel arbitration	5.10
Feb 17/2021	RES	Work on response to motions filed by Keefe and Rapid	4.30
Feb 18/2021	CRY	Work on response to motions to compel arbitration, including review of cases and additional research	3.70

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Feb 18/2021	RES	Work on response to motions filed by Keefe and Rapid, research for same, pull key cases	5.20
Feb 19/2021	CRY	Work on response to motions to compel arbitration, including review of cases and additional research	5.20
Feb 19/2021	RES	Review drafts of responsive brief, identify additional issues and problems, update research and cases	2.10
Feb 20/2021	CRY	Work on response to motions to compel arbitration, including review of cases and additional research	6.00
Feb 20/2021	RES	Read, review and edit brief; review sections drafted by Mr. Youtz	7.10
Feb 23/2021	CRY	Work on response to motions to compel arbitration, including review of cases and additional research	3.50
Feb 24/2021	CRY	Work on response to motions to compel arbitration, including review of cases and additional research	4.00
Feb 25/2021	CRY	Work on response to motions to compel arbitration, including review of cases and additional research	5.80
Feb 26/2021	CRY	Work on response to motions to compel arbitration, including review of cases and additional research	4.30
Feb 27/2021	CRY	Additional computerized research; drafting of sections of brief; review of records and exhibits submitted by defendant	4.70
Mar 1/2021	RES	Check status of response with Mr. Youtz, review section, spot research for section	2.10
Mar 1/2021	CRY	Further work on addressing motions to compel including drafting of my declaration in opposition; review of discovery and other evidence received for use as exhibits	5.10
Mar 5/2021	RES	Revise section of brief re arbitration; review declarations and edit same	1.20
Mar 8/2021	RES	Final review and edits to brief from Mr. Youtz	5.80
Mar 8/2021	CRY	Finalize and file opposition to Keefe's motion to compel and Rapid motion to compel including declarations	4.20
Mar 12/2021	RES	Read, review and outline Keefe's brief in reply; read, review and outline Rapid/Cache's brief in reply on arbitration issue; draft notes to file on reply and issues for potential oral argument on same	5.70
Mar 15/2021	CRY	Review reply briefs submitted by defendants	1.20
Apr 3/2021	CRY	Email regarding preparing for pretrial conference	0.20
Apr 6/2021	RES	Prepare for attorney conference; outline and list topics and issues to discuss, circulate same	2.60
Apr 7/2021	RES	Hold FRCP 26(f) conference; notes to file on agreements and areas of dispute	1.30

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Apr 7/2021	CRY	Conference with all counsel to prepare status report for court	0.70
Apr 13/2021	CRY	Prepare draft status report, send to defendants for review	2.20
Apr 16/2021	RES	Work on new joint status report	2.10
Apr 19/2021	RES	Edit and circulate JSR	1.20
Apr 19/2021	CRY	Send comments on proposed revisions to status report from defendants telephone call regarding same	0.80
Apr 20/2021	RES	Final edits and file JSR	0.30
Apr 20/2021	CRY	Finalize and file joint status report	0.30
May 17/2021	RES	Review and calendar new pretrial and trial dates	0.20
Jun 2/2021	RES	Read and review order; discuss with Mr. Youtz; plan next stage of discovery	1.20
Jun 2/2021	CRY	Receive and review order denying motion to compel arbitration; Emails with client regarding same	0.60
Jun 8/2021	RES	Update notice status and email to counsel about notice addresses and data	0.20
Jul 7/2021	RES	Prepare for conference with opposing counsel on notice; create task list for notice; conference call with opposing counsel	1.40
Jul 19/2021	CRY	Draft mediation statement as required by mediation order in Ninth Circuit	1.30
Jul 21/2021	CRY	Finalize and submit mediation statement for Ninth Circuit	0.30
Jul 27/2021	CRY	Respond to mediators question regarding if settlement against Keefe is feasible; Conference with clients regarding same; additional email exchanges with mediator	2.10
Aug 31/2021	RES	Work on class notice issues; reach out to administrators for bids; create RFP	2.60
Sep 1/2021	RES	Review data for scope of notice and number of addresses, spot-check data for accuracy; identify issues with data; discuss issues with claims expert at Epiq; conference call with opposing counsel on data issues and problems	6.10
Sep 2/2021	RES	Work with Epiq on notice plan; review proposals; discuss issues with data and methods to reach class members; outline notice tasks and issues; discuss same with other claims administrator	5.10
Sep 3/2021	RES	Continue to work on notice issues and outreach	2.40
Sep 7/2021	RES	Outline motion to approve notice plan; draft notices; work with claims administrator	5.30
Sep 8/2021	RES	Notice tasks and issues, revise motion	1.50
Sep 9/2021	RES	Review and revise notices; forward same to administrator	0.60
Sep 9/2021	CRY	Review of defendant suggestions on proposed notice to class members; provide comments to Rick regarding same	0.80

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Sep 10/2021	CRY	Prepare edits to proposed class notice	1.60
Sep 12/2021	CRY	Determine data for use in providing notice to class members through review of database; provide information to Rick	2.00
Sep 14/2021	RES	Work on administrator on notice issues and problems with data; revise motion; revise declaration on publication notice issues; research for same	4.10
Sep 14/2021	CRY	Provide final edits to class notice	0.40
Sep 15/2021	RES	Revise notice plan motion; revise declarations; draft proposed order on notice; review new uploaded data from defendants	5.10
Sep 15/2021	CRY	Download new data from Rapid regarding class members and data on the cards; organize for transfer to database; Process data so that it can be usable in database; run procedures to determine additional data for use in class notice	3.10
Sep 16/2021	RES	Finalize plan; finalize motion; edits to declarations; edits to notices; file same	4.10
Sep 16/2021	CRY	Provide additional data information to Rick for use in class notice motion obtained from recent data produced by Rapid	0.80
Sep 20/2021	RES	Review new documents and data produced by Rapid/Cache	3.20
Sep 20/2021	CRY	Perform analysis from this data received from Rapid where facilities appear to be missing data; prepare this analysis and send to defendants	2.80
Sep 27/2021	RES	Review objections by Keefe, review objections by Rapid; work on reply to same	4.30
Sep 27/2021	CRY	Review defendants opposition to proposal for class notice; email with comments to Rick Spoonemore	1.50
Sep 28/2021	RES	Discuss objections with Mr. Youtz; call to defendants counsel; emails re same	1.80
Sep 29/2021	RES	Work on proposal to get to agreed class notice; calls re same	0.60
Oct 1/2021	RES	Draft and file reply brief on initial class notices	0.90
Oct 4/2021	CRY	Email exchange with Ninth Circuit mediator regarding zoom conference with Keefe	0.30
Oct 7/2021	CRY	Further email exchanges regarding settlement conference with Keefe	0.20
Oct 8/2021	RES	Read and analyze Rapid's 9th Circuit Appeal Brief; outline research issues and tasks; discuss same with Mr. Youtz	4.80

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Oct 9/2021	RES	Careful review of excerpts of record filed by Rapid and Cache Valley, note issues with filing	3.90
Oct 25/2021	CRY	Email exchanges regarding motion to consolidate appeals	0.40
Oct 27/2021	CRY	Telephone conference with Ross Ponessa regarding settlement; Email regarding same to Rick	0.80
Oct 31/2021	CRY	Start preparation of mediation memo; review database for dollar amounts on Washington facilities	2.80
Nov 1/2021	CRY	Drafting mediation memorandum and performing damages analysis	3.00
Nov 2/2021	RES	Read and review mediation submission; edit same; review Keefe's submission; outline potential settlement amounts	2.50
Nov 2/2021	CRY	Finalize and submit mediation memo to 9th Circuit mediator	1.60
Nov 9/2021	RES	Prepare for mediation; mediate with 9th Circuit mediator; conference with Mr. Youtz	2.80
Nov 9/2021	CRY	Zoom mediation with Ninth Circuit mediator	2.40
Nov 10/2021	RES	Review status of responsive 9th Circuit Brief; assist with research for same; review sections of draft brief; additional research for same	6.30
Nov 11/2021	RES	Careful review of contract for notice; email to Mr. Youtz; email questions to Epiq	2.10
Nov 12/2021	CRY	Prepare data for sending to expert on damages; several emails regarding data definitions and other information; conference with expert	3.60
Nov 13/2021	RES	Work on distribution issues connected to Keefe settlement	1.10
Nov 23/2021	CRY	Crosscheck results of experts calculations with those done by us; emails regarding same; additional discussion with expert regarding his work	2.10
Nov 24/2021	CRY	Work on response to appeal of order denying motion to compel	0.00
Nov 25/2021	CRY	Review draft of experts report	0.80
Nov 26/2021	CRY	Work on response to appeal of order denying motion to compel	3.80
Nov 28/2021	CRY	Review and proposed revisions to background on report	3.40
Nov 29/2021	CRY	Served copy of experts report on defendants is required by schedule	0.30
Nov 30/2021	CRY	Prepare report to mediator on status of settlement; Email regarding whether order on class notice should be amended to account for settlement in Keefe class at notice requirements should be changed	0.70
Dec 1/2021	CRY	Work on response to appeal of order denying motion to compel	5.20

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Dec 2/2021	CRY	Work on response to appeal of order denying motion to compel	6.10
Dec 4/2021	CRY	Work on response to appeal of order denying motion to compel	5.80
Dec 6/2021	RES	Assist with final revisions to 9th Circuit Brief, proof and revise same; email to Mr. Youtz on brief	6.80
Dec 6/2021	CRY	Work on response to appeal of order denying motion to compel; Review of new Brown decision for use in brief	2.10
Dec 7/2021	RES	Continue to review and revise 9th Circuit Brief, review excerpts of record, review and check cites	5.70
Dec 7/2021	CRY	Work on response to appeal of order denying motion to compel	3.80
Dec 8/2021	RES	Final review and edits to 9th Circuit Brief, file same	4.60
Dec 8/2021	CRY	Finalize and file response to appeal of order denying motion to compel	4.70
Dec 16/2021	RES	Extensive work on text of notices; read defendants' objections; work to find agreed language; draft motion to approve; draft order	6.10
Jan 3/2022	RES	Forward approved notice material to Epiq; respond to questions from Epiq	0.30
Jan 12/2022	DSG	New discovery response dates calendared by staff	0.10
Jan 12/2022	RES	Prepare for conference; outline pending dates and schedule; conference with opposing counsel on adjustments given 9th Circuit delay	1.30
Jan 12/2022	CRY	Prepare status report for Ninth Circuit mediator; conference call with counsel for defendants regarding schedule changes because of appeal	1.80
Jan 15/2022	CRY	Draft language to go to mediator regarding timing of dismissals for settlement; Submit proposed schedule with December 5 trial date to defendants to submit to court	1.10
Jan 24/2022	CRY	Agree to further adjustments to proposed schedule with defendants; Draft stipulated motion change trial date using those deadlines	0.70
Jan 28/2022	CRY	Read defendants reply brief in support of their appeal	0.80
Jan 31/2022	RES	Read and review Rapid's 9th Circuit Reply Brief; draft notes to file regarding issues and potential oral argument topics and issues	4.10
Feb 25/2022	DSG	Receive voice mail from individual who received a postcard re debit card issuance	0.10
Feb 28/2022	DSG	Review debit card related voicemail again from 2/25. Send email to RS and CY to report.	0.10

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Mar 20/2022	CRY	Email to claims administrator regarding changes that should be made to website and need for information from them	0.50
May 10/2022	CRY	Prepare for oral argument	4.60
May 11/2022	CRY	Travel to Portland for oral argument; continue preparing for oral argument; complete outline	5.80
May 12/2022	RES	Watch oral argument on Rapid's appeal, draft notes to file re: same; conference with Mr. Youtz and other counsel	1.20
May 12/2022	CRY	Present oral argument before Ninth Circuit Court of Appeals; travel to Seattle	4.10
May 16/2022	CRY	Communications with numerous class members regarding questions they have on case; emails regarding same; research regarding their individual circumstances and whether they are class members are not	3.20
May 26/2022	RES	Draft settlement notices; outline approval motion; run data on expected claims	6.30
May 27/2022	RES	Draft long form notice; draft approval motion; draft proposed order	4.80
May 30/2022	RES	Revise settlement documents and approval materials	5.10
May 31/2022	RES	revise proposed notices, revise motion to approve; draft declarations, collect exhibits for same	5.10
Jun 1/2022	RES	Outline and begin draft for preliminary approval of agreement; research for same; collect exhibits and documents for supporting declarations; begin to draft short form and long form notices	7.20
Jun 2/2022	RES	Continue to draft settlement approval motion and package; work with claims administrator on plan; conference regarding same	5.30
Jun 3/2022	RES	Emails to potential claims administrators; edit and revise motion; begin to draft declaration; create RFP	4.80
Jun 6/2022	RES	Edit and revise material; outline claims process; begin to collect data on potential claims; edit and modify proposed class notices	3.70
Jun 7/2022	RES	Model expected claims rate and probability of extra funds; run data on allocation between defendants for purposes of preliminary approval against Keefe; review discovery data on volume of cards in Washington institutions for model	8.30
Jun 8/2022	RES	Final revisions and edits to motion package; modify model on claims	4.20
Jun 9/2022	RES	Draft proposed order; edit and file motion, declaration and order; begin to outline research tasks related to Rapid	7.40

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Jun 10/2022	RES	Extensive research into the EFTA; outline key research tasks and legislative history; structure outline for potential MSJ against Rapid and Cache	8.10
Jun 13/2022	RES	Research on EFTA; research key regulations	4.80
Jun 14/2022	RES	Continue deep research into EFTA; pull all EFTA cases and begin review	5.50
Jun 15/2022	RES	Continue to read, review and pull key sections from EFTA authorities; review approval order	4.80
Jun 16/2022	RES	Draft memo on key issues for potential motion on EFTA; identify additional research tasks on the EFTA	4.10
Jun 17/2022	RES	Identify potential factual issues in EFTA, pull and review discovery; begin to review documents produced by Rapid and Cache	6.20
Jun 20/2022	RES	Continue to review documents related to EFTA claims and defenses	7.70
Jun 21/2022	RES	Continue document review	5.70
Jun 22/2022	RES	Create a key document folder, cull key material for potential MSJ, make notes on key documents	6.40
Jun 23/2022	RES	Begin to draft an outline of potential motion	6.20
Jun 24/2022	RES	Continue to draft outline of potential motion; pull key research from file for same	6.00
Jun 27/2022	RES	Work on identifying additional discovery necessary for potential MSJ; outline line to file, check documents for other potential areas of inquiry	5.90
Jun 28/2022	RES	Work on discovery related to Cache Valley and new bank; begin research into issues related to new bank that was not named as a defendant	5.30
Jun 29/2022	RES	Conduct ██████████ research; conduct ██████████ ██████████ research; draft notes to file	4.70
Jun 30/2022	RES	Work on identifying remaining discovery necessary; draft lengthy email to opposing counsel seeking depositions and dates; work on supplemental requests	4.60
Jun 30/2022	CRY	Review of proposed email to go to defendants regarding discovery	0.50
Jul 1/2022	RES	Research EFTA on ██████████ ██ ██	3.10
Jul 5/2022	RES	Draft note to file regarding EFTA ██████████ ██████████	4.50
Jul 5/2022	CRY	Make revisions to second set of discovery to Rapid; email regarding same	0.80

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Jul 6/2022	RES	Pull data from expert for new discovery requests; Draft new set for discovery to Cache, Rapid, including RFA and interrogatories; continue research on EFTA, including punitive damages provisions; email to opposing counsel	8.40
Jul 7/2022	RES	Continue research on EFTA's \$500k damage provision and standards for its application; pull cases under similar statutory schemes and review	4.20
Jul 8/2022	RES	Continue analysis for EFTA's statutory damages provisions; draft note to file on key cases; review Ohio case filings for issues in that case	6.40
Jul 11/2022	RES	Discussion regarding moving trial date; float potential dates; draft proposed order; continue to work on potential motion	3.70
Jul 14/2022	RES	Research CPA claim for potential MSJ, pull key cases, begin review of treble damages cases and standards	6.20
Jul 15/2022	RES	Continue CPA research for potential motion, focus on damages issues	4.90
Jul 18/2022	CRY	Lengthy email to update clients on status of case	0.60
Jul 20/2022	RES	Research ability to [REDACTED] [REDACTED] [REDACTED]	7.10
Jul 21/2022	RES	Continue [REDACTED] research and ability to obtain [REDACTED] [REDACTED]	5.10
Jul 22/2022	RES	Draft note to file on [REDACTED] [REDACTED] [REDACTED]	4.30
Jul 25/2022	RES	Extensive research on [REDACTED] [REDACTED] [REDACTED]	6.20
Jul 26/2022	RES	Continue research into [REDACTED] [REDACTED] [REDACTED]	5.30
Aug 26/2022	RES	Update case status; outline tasks and potential discovery; note to file	2.10
Aug 30/2022	DSG	Call from class member named "Daniel Gross" with questions re notice he received; email to R.S. and C.Y. re same. Email from staff re recording class member info.	0.50
Sep 16/2022	EH	review case file; outline summary judgment brief	5.20
Oct 3/2022	EH	review docket and deadlines	2.50

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Oct 3/2022	EH	email with Rick Spoonemore re missing discovery before cutoff	0.30
Oct 3/2022	RES	Draft fees motion; draft supporting declarations; draft order	7.10
Oct 4/2022	RES	Extensive EFTA research; pull and review prior research files; begin to update cases	8.10
Oct 5/2022	RES	Continue to update cases; read new decisions; outline motion for summary judgment on EFTA claims	6.10
Oct 7/2022	RES	Continue work on EFTA SJ motion; begin review of regs	5.10
Oct 10/2022	RES	Exhaustive review of regs, draft memo on same	7.30
Oct 11/2022	RES	Review discovery; draft FRCP 30(b)(6) notices identifying issue for SJ motion	2.10
Oct 12/2022	EH	revise and edit outline and facts needed for summary judgment; email to Rick Spoonemore	3.30
Oct 12/2022	EH	email with Rick Spoonemore about Manning deposition	0.20
Oct 12/2022	EH	review case file for summary judgment motion	2.70
Oct 12/2022	EH	draft deposition notices for Manning, Rapid and Cache; email with Rick Spoonemore	1.30
Oct 12/2022	RES	Read and review Rapid's responses to second set of RFP; read and review Rapid's response to interrogatories; read and review Cache Bank's responses to each; identify multiple problems with responses and begin to draft letter seeking discovery conference; spot research for letter; email SJ brief to Ms. Hamburger for edits, drafting and revisions	6.10
Oct 13/2022	EH	review and edit Notices of Rule 30(b)(6) deposition	1.50
Oct 13/2022	EH	research related to summary judgment motion	2.80
Oct 13/2022	RES	Continue to work on SJ EFTA issues; draft sections for brief	5.50
Oct 14/2022	RES	Continue to draft sections of brief	4.10
Oct 17/2022	RES	Work on issues likely to be raised by Rapid and Cache in summary judgment; identify research areas and task; email to Ms. Hamburger on Section 16931-1	6.90
Oct 19/2022	EH	email with Rick Spoonemore about the deposition of Michael Manning	0.50
Oct 19/2022	RES	Continue to work on legal issues likely to be raised by Rapid on motion; research regulations for responses; review discovery and disclosures for evidence to support responses	6.40
Oct 20/2022	RES	Prepare for conference; conference with opposing counsel on discovery and depositions; note to file	1.30
Oct 21/2022	RES	Extensive research on regulatory issues under EFTA; draft memo on same	7.10

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Oct 24/2022	EH	draft and revise brief for final approval of settlement; email to Rick Spoonemore	1.00
Oct 24/2022	RES	Draft note to file regarding addressing likely SJ issues that will be raised by Rapid and Cache; research [REDACTED]	5.90
Oct 25/2022	EH	review analysis from Rick Spoonemore for summary judgment briefing	1.00
Oct 25/2022	RES	Review issues related to [REDACTED]	6.10
Oct 26/2022	RES	Continue [REDACTED]	5.50
Oct 27/2022	RES	Draft overview memo on key arguments and facts necessary to support each; identify evidence we have, evidence that appears undisputed and might be subject to agreement; identify witnesses to depo is agreement is not possible	8.30
Oct 28/2022	RES	Edit memo and pull documents for key documents folder, organize same	2.10
Oct 31/2022	RES	Identify key facts for SJ and draft email attempting to get agreement in lieu of depositions; email exchanges with opposing counsel re same	3.10
Nov 3/2022	EH	research related to summary judgment motion; outline motion; outline facts required for motion	5.20
Nov 8/2022	EH	observe oral argument in the Ninth Circuit	1.00
Nov 13/2022	RES	To Tacoma for hearing; meeting with opposing counsel in advance to discuss schedule and settlement; attend hearing; draft note upon return	7.90
Nov 14/2022	RES	Additional discussion concerning mediation and mediator; email to Mr. Peterson concerning availability	0.70
Nov 14/2022	CRY	Fairness hearing for Keefe settlement and status conference for remainder of case; travel to and from Tacoma conference with defense counsel regarding same	3.20
Nov 15/2022	RES	Work on set of stipulated facts for trial	4.60
Nov 16/2022	RES	Review documents for support and continue to work on stipulated facts; begin to pull documents for trial exhibits if not stipulated	3.50

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Nov 17/2022	RES	Detailed review of material gathered by prior counsel; review material cited in original complaint; research Wayback machine for webpages and evidence	5.30
Nov 18/2022	RES	Continue research into old public posting by defendants on the internet	4.80
Dec 22/2022	EH	review Brown decision in light of Reichert summary judgment brief	0.50
Dec 22/2022	CRY	Review Brown decision from Court of Appeals; emails regarding same	0.60
Dec 27/2022	EH	research related to summary judgment motion; draft sections of motion	6.40
Dec 28/2022	EH	research related to summary judgment motion; draft sections of motion	5.20
Dec 29/2022	EH	research related to summary judgment motion; draft sections of motion	4.40
Dec 30/2022	EH	research, draft and edit sections of summary judgment brief	5.70
Dec 30/2022	EH	email specific questions to Rick Spoonemore	0.30
Dec 30/2022	EH	review decision from the Court of Appeals; email with Chris Youtz and Rick Spoonemore about decision	0.70
Dec 30/2022	RES	Read 9th Circuit opinion, discuss same with Mr. Youtz, outline tasks going forward and schedule issues; email to Ms. Hamburger on access accounts under regulations	2.10
Dec 30/2022	CRY	Review opinion from Court of Appeals affirming denial of motion to compel arbitration	0.60
Jan 3/2023	EH	research, draft and edit sections of the summary judgment brief	7.30
Jan 3/2023	EH	call with Rick Spoonemore with questions about briefing	0.50
Jan 4/2023	CRY	Keefe Settlement Fees per Court Order	0.00
Jan 4/2023	EH	participate in case planning call with Rick Spoonemore and Chris Youtz	0.50
Jan 4/2023	EH	research, draft and edit mediation statement	5.20
Jan 4/2023	RES	Draft mediation letter; collect exhibits; circulate	6.10
Jan 4/2023	CRY	Telephone conference with Rick regarding mediation	0.20
Jan 5/2023	EH	research, draft and edit mediation statement	6.20
Jan 5/2023	RES	Prepare for call; run damage model; pre-mediation call; note to file	1.20
Jan 5/2023	CRY	Telephone call with Lou Peterson to set up schedule for mediation; Review of draft of mediation statement started by Ele	0.60
Jan 6/2023	CRY	For the review of draft of mediation statement; make edits regarding same; email with Rick regarding same	1.20

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Jan 9/2023	EH	review plaintiffs and defendants mediation statements	1.20
Jan 9/2023	CRY	Substantial revisions to mediation statement email regarding same forward revised draft to Rick and Ele; Additional email exchanges regarding mediation statement and content; Revise, finalize, and send mediation statement and exhibits to mediator and opposing counsel	4.20
Jan 10/2023	EH	review Brown briefing; research related to pooling argument; draft and edit section of brief re: pooling	3.20
Jan 10/2023	EH	review mediation response; confer with Rick Spoonemore	0.90
Jan 10/2023	RES	Draft long form class action settlement agreement; draft supplemental submission to mediator; emails with Mr. Youtz; revise and edit supplemental submission	6.90
Jan 10/2023	CRY	Prepare response to defendants mediation statement; email with Rick regarding same; review research on safe harbor provisions under EFTA that we had done in Brown case and forward to Rick and Ele	3.60
Jan 11/2023	RES	Prepare for mediation with Mr. Peterson; conference with Mr. Youtz; all day mediation; draft post-mediation memo regarding issues and potential approaches to restart process; run damages model to predict range of settlement values	9.20
Jan 11/2023	CRY	Mediation session with Lou Peterson; Further discussion regarding upcoming status conference with court	4.70
Jan 12/2023	CRY	Status conference with court; scheduling said for summary judgment motions	1.20
Jan 13/2023	RES	Review email from Mr. Peterson regarding new offer; conference with Mr. Youtz; run damage model; work on response to offer; note to file on settlement progress	2.10
Jan 13/2023	CRY	Review of current form of stipulated facts being proposed for summary judgment; Further discussions with Lou Peterson regarding offer from defendants	2.60
Jan 15/2023	RES	Conference with Mr. Youtz re settlement; review email to Mr. Peterson; note to file	1.10
Jan 15/2023	CRY	Email responding to defendants offers sent to Lou Peterson; further discussions regarding counteroffer	0.80
Jan 16/2023	CRY	Additional telephone discussion with Lou Peterson regarding exchanging offers	0.70
Jan 17/2023	RES	Conference with Mr. Youtz re settlement; conference with mediator Peterson; draft note to file	2.10
Jan 17/2023	CRY	Additional telephone calls and offer exchanges through Lou Peterson	0.60

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Jan 24/2023	EH	research, draft and edit motion for summary judgment re: liability	6.30
Jan 24/2023	CRY	Revise proposed stipulated facts; forward to Rick for comment; Review of work done to date on summary judgment motion	4.70
Jan 25/2023	EH	review stipulated facts; confer with Rick Spoonemore	0.80
Jan 25/2023	EH	email with Chris Youtz regarding draft motion for summary judgment	0.20
Jan 26/2023	RES	Careful review of potential stipulated facts; detailed email to Mr. Youtz with questions, comments and issues on same	2.10
Jan 26/2023	CRY	Further revisions to stipulated facts; lengthy email to Rick regarding rationale behind changes to stipulated facts further review and workup on summary judgment motion; send proposed stipulated facts to counsel for Rapid	5.20
Jan 27/2023	CRY	Additional exchange of offers and discussion with Lou Peterson regarding settlement	0.40
Jan 28/2023	CRY	Working on summary judgment motion; review of documents for use as exhibits; preparation of declarations regarding same	6.40
Jan 30/2023	CRY	Email to Rapid counsel regarding stipulated facts or whether we need to do deposition to establish facts; continue your work on summary judgment motion	3.20
Jan 31/2023	RES	Prepare for call; call to review stipulated facts	1.10
Feb 1/2023	RES	Work on MSJ	5.20
Feb 2/2023	RES	Work on MSJ	4.50
Feb 2/2023	CRY	Review of proposed stipulated facts from Rapid; conference regarding same	2.10
Feb 3/2023	RES	Work on MSJ	6.70
Feb 3/2023	CRY	Telephone call and negotiations with counsel for Rapid regarding stipulated facts for summary judgment motion	1.80
Feb 6/2023	RES	Read and review opposing counsels version of stipulated facts; edit and revise same; identify issues with same; review documents for support	7.70
Feb 7/2023	EH	review stipulated facts; email edits to Rick Spoonemore	1.60
Feb 7/2023	RES	Prepare for conference and conference with opposing counsel re stipulated facts	0.90
Feb 7/2023	CRY	Further email exchanges negotiations with Rapid regarding stipulated facts for summary judgment; Additional offer from defendants to settle case conference Lou Peterson regarding same	2.60

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Feb 8/2023	RES	Continue to work on motion; work on stipulated facts; draft stipulation on schedule	5.80
Feb 9/2023	RES	Continue to work on motion, work on anticipated response to cross motion	2.50
Feb 9/2023	CRY	Further discussions on stipulated facts; conference regarding whether we should approach court to modify summary judgment dates; file joint motion on summary judgment briefing	3.80
Feb 10/2023	RES	Redraft sections of motion; revise facts	4.20
Feb 14/2023	CRY	Further communications on stipulated facts and work on summary judgment motion; Respond regarding last offer made by defendants, make new offer	2.10
Feb 15/2023	RES	Read and revise Defendants' update agreed facts; discuss same with Mr. Youtz; work in same to motion; work on settlement issues	3.60
Feb 15/2023	CRY	Forward draft of summary judgment motion to Rick and Ele for review with email explanations of approach	5.30
Feb 16/2023	EH	review and edit motion for summary judgment re liability	1.80
Feb 16/2023	RES	Prepare for and participate in conference with opposing counsel on agreed and stipulated facts; note to file on issues; review motion in light of agreed facts; read and review new drafts from opposing counsel; settlement discussions and issues; review SJ brief from Mr. Youtz and edit and revise same	3.80
Feb 16/2023	CRY	Review of defendants revised proposed stipulation of facts; respond to same; telephone conference with counsel for Rapid regarding same further revisions to stipulated facts; further revisions and discussions on summary judgment brief and declarations; telephone call with counsel for Rapid regarding all of this; email to Lou Peterson regarding final settlement offers; additional discussions regarding stipulated facts and summary judgment brief	12.80
Feb 17/2023	RES	Continue to work on filings, and potential cross motion response; continue to work on settlement issues	5.30
Feb 17/2023	CRY	Further exchanges regarding stipulated facts; telephone call with counsel for Rapid and agreement to extend filing date for summary judgment from today to next week as rapid they accept our settlement proposal; prepare pleadings to do same; review with opposing counsel and file	4.10
Feb 20/2023	RES	Work on settlement; discuss same with Mr. Youtz	0.60

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Feb 21/2023	RES	Continue settlement discussions; respond to call from mediator; conference with Mr. Youtz	3.40
Feb 21/2023	CRY	Email regarding stipulated facts while waiting for Rapid decision on settlement; set up conference for tomorrow	0.60
Feb 22/2023	RES	Review redline edits from opposing counsel; note differences, review brief	1.20
Feb 22/2023	CRY	Conference with counsel for Rapid regarding stipulated facts several exchanges of proposed facts; set up conference for tomorrow to finalize since filing motion is in a couple of days	1.70
Feb 23/2023	RES	Confirm settlement agreement with mediator and opposing counsel; discuss details with Mr. Youtz, discuss need for class end date and discuss possibilities, call to clients	5.90
Feb 23/2023	CRY	Email exchanges regarding agreement to settle case; email with Rapid counsel regarding next steps to finalize settlement including preparation of settlement agreement; Emails with opposing counsel regarding need for updates of data; the end of the day for claims; and other information to help provide notice to class and finalize claims	2.90
Feb 24/2023	RES	Organize files and documents in light of settlement; identify notice issues and outline methods of notice; model various claims rates and expected cy pres	3.00
Feb 24/2023	CRY	Forward copy of Keefe settlement agreement to counsel for Rapid as starting point for settlement agreement; telephone call Lou Peterson regarding using him as an arbitrator in event of dispute over settlement terms	1.50
Feb 26/2023	CRY	Obtain domain name and began setting up website for settlement	2.80
Mar 2/2023	CRY	Request data from Epiq for website and settlement	0.40
Mar 6/2023	CRY	Request data from Epiq for website and settlement	0.20
Mar 9/2023	CRY	Request data from Epiq for website and settlement	0.20
Mar 10/2023	CRY	Received proposed draft settlement from counsel for rapid; review and revise; send redline version to counsel for Rapid	1.80
Mar 15/2023	RES	Address settlement implementation issues with opposing counsel	1.60
Mar 23/2023	RES	Email to opposing counsel	0.10
Mar 23/2023	CRY	Telephone conference with counsel for Rapid regarding draft settlement agreement	0.70

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Mar 24/2023	CRY	Combining address data from various sources from Epiq including known bad addresses to prepare database with good addresses for settlement mailing; right program to perform functions regarding same	4.80
Mar 28/2023	RES	Review email on distribution system; outline various methods of fair distribution, review state claim data to prevent double recovery; review email from opposing counsel on same	2.50
Mar 29/2023	CRY	Lengthy email to counsel for Rapid regarding suggested way of distributing money to class members for equitable resolution between Washington sub class and national class; further emails regarding same	1.10
Mar 30/2023	CRY	Program database to determine unique persons receiving settlement funds who have multiple cards; program database to determine individual amount allocated to persons for fees from all the cards they received; prepare tables regarding same for discussion with defendant	4.10
Mar 31/2023	RES	Prepare for meeting; make notes for meeting; attend conference with opposing counsel on settlement implementation issues; read and review Watkins motion to intervene and object; read and review Jones declaration; discuss same with Mr. Youtz; research for same on standing issues; email to Tinamarie Feil at BMC Group for a potential bid to administer settlement and provide notice	5.20
Mar 31/2023	CRY	Call with counsel for Rapid regarding structure of class and data on individual class members and distributing funds; email exchange with claims administrator regarding mailing using addresses they currently have and updating records; Attempt to find information on Nevada claimants and facilities, determined that missing facilities from database; email exchange with counsel for Rapid regarding same	2.70
Apr 2/2023	CRY	Receive and review current draft of settlement agreement from counsel for Rapid	1.50
Apr 3/2023	RES	Discuss revisions to agreement with Mr. Youtz	0.80
Apr 3/2023	CRY	Email to counsel for Rapid with suggested changes to current draft of settlement agreement	0.80
Apr 4/2023	RES	Begin to draft motion for preliminary approval of settlement agreement	6.40
Apr 4/2023	CRY	Review of motion to intervene by Nevada counsel to object to settlement; begin research and drafting to oppose motion	3.40

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Apr 5/2023	CRY	Continue research and drafting of response in opposition to motion to intervene	3.70
Apr 6/2023	CRY	Email to Lou Peterson to let him know that a motion been filed claiming that this was a "sham" mediation in case we need declaration from him to oppose the arguments made by the proposed intervenors; continue work on research and drafting of response to motion to intervene	4.10
Apr 8/2023	CRY	Create and organize website for settlement	4.20
Apr 10/2023	CRY	Further review of settlement agreement with changes made by defendant; object to term that would require termination if there is a carveout of Nevada claims based on current motion; comment on additional other changes	1.30
Apr 12/2023	CRY	Additional work on response to motion to intervene	1.80
Apr 14/2023	CRY	Email to Rapid counsel regarding status of settlement agreement and upcoming motion	0.60
Apr 15/2023	RES	Read and review motion for summary judgment filed by plaintiffs in Nevada case; pull key cases; identify potential issues and problems and impact on our case; draft note to file	2.10
Apr 16/2023	CRY	Further revisions to response to motion to intervene; circulate for comment	2.10
Apr 17/2023	EH	review and edit response to motion to intervene and declaration	1.00
Apr 17/2023	RES	Read and review response to Watkins motion; discuss same with Mr. Youtz; read and review Defendants' response to Watkins motion; read and review declarations; review cases cited in brief; note to file on issues, especially. standing	4.30
Apr 17/2023	CRY	Revise and finalize response to motion to intervene; finalize declaration; submit for filing	3.70
Apr 18/2023	CRY	Review of defendants opposition to motion to intervene and declarations	0.80
Apr 19/2023	CRY	Additional work on creating website including bringing documents in for case and programming search capability	5.10
Apr 21/2023	RES	Read and review reply brief on motion to intervene and object	1.40
Apr 21/2023	CRY	Review reply submitted by proposed intervener in support of his motion to intervene	0.60
Apr 24/2023	CRY	Work on website and claims processing system for claims to be submitted and verified	3.80
May 3/2023	CRY	Program and test website and set up data handling capability	3.60

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
May 8/2023	CRY	Email to Rapid counsel regarding wrapping up settlement agreement	0.20
May 16/2023	CRY	Further email regarding status of settlement agreement	0.20
May 17/2023	CRY	Email from Rapid stating that the agreement had been sent for signature by clients	0.20
May 30/2023	CRY	Further work on setting up and testing website	1.60
Jun 8/2023	CRY	Email to Rapid counsel for signed settlement agreement for use with motion for preliminary approval being drafted	0.20
Jun 14/2023	RES	Finalize agreement; discuss with Mr. Youtz Defendants' data problem; run effect on damages and concerns about being provided incorrect data; research potential remedies	5.10
Jun 14/2023	CRY	Email from Rapid counsel sending signed agreement; defendants also noted that data was not produced to us for certain facilities during the litigation and would be produced shortly	0.30
Jun 15/2023	RES	Extensive research on potential remedies for settlement based on flawed data from defendants, review cases on rescission, modification and damages for failure to provide accurate data upon which a settlement was premised	5.90
Jun 17/2023	CRY	Set up website to go public for testing review and revise claim submission procedures and opt out procedures	3.40
Jun 20/2023	CRY	Review of motion for preliminary approval; email comments regarding same	1.60
Jun 21/2023	CRY	Meeting with Rick, Paul Wright, Ele, and Daniel Gross regarding case	1.30
Jun 22/2023	CRY	Obtain new data from Rapid regarding facilities and cards not included previously in litigation; download and review and organize for database	4.70
Jun 23/2023	RES	Discuss flawed data with Mr. Youtz, talk about remedies for errors; review emails re same issue	0.80
Jun 23/2023	CRY	Review new data to determine number of additional cards and fees involved and potential new addresses that need to be handled; email to Rick summarizing findings; email to counsel for Rapid regarding my findings and expressing concern of how this affects the settlement amount	5.20
Jun 26/2023	RES	Prepare for Zoom call; Zoom call on missing/inaccurate data; conference with Mr. Youtz re same; read/review order on motion to intervene and object; discuss same with Mr. Youtz	2.70
Jun 27/2023	CRY	Conference with counsel for Rapid regarding need to change settlement amount to account for new data just received	1.20

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Jun 29/2023	CRY	Follow-up email regarding effect of new data on settlement	0.30
Jun 30/2023	CRY	Received revised data from Rapid; begin download and review of new data; prepare program to analyze data	3.70
Jul 1/2023	CRY	Prepare summary of revised data showing changes in number of cards and fees because of additional data; provide information to counsel for rapid for discussions and settlement amount	3.80
Jul 5/2023	CRY	Email exchanges with Rapid regarding need for information regarding facilities for use in settlement notice	0.80
Jul 7/2023	CRY	Further working and testing on website	3.80
Jul 10/2023	RES	Continue to review and work on solutions to flawed data issues	1.00
Jul 10/2023	CRY	Email from Rapid for information regarding claim rates with Keefe settlement and costs of providing notice to help determine additional money that should be paid; respond to same with information regarding Keefe settlement and other information	0.80
Jul 11/2023	CRY	Prepare and provide table to counsel for Rapid with statistics regarding Keefe settlement; Review of draft proposals for claims administrators to manage settlement process; prepare email with comments regarding same; research on whether we need to issue a 1099 form in connection with the settlement	3.10
Jul 14/2023	CRY	Conference with counsel for Rapid regarding additional compensation for additional class members and providing information regarding Keefe settlement	0.80
Jul 17/2023	RES	Review emails regarding missing data and impact on damage analysis	0.20
Jul 17/2023	CRY	Email to provide additional information requested by defendant Rapid; Request staff to submit claims and opt outs to test capability of website to get their reactions to interface; emails from staff regarding their experiences	2.80
Jul 18/2023	CRY	Email demand to counsel for Rapid that mediation reopen or that something be done to compensate class for the additional number of members and fees incurred	0.40
Jul 19/2023	RES	Discuss additional payment remedies with Mr. Youtz	0.50
Jul 19/2023	CRY	Further revisions and testing of website based on trial run	2.10
Jul 20/2023	RES	Review counter offer from defendants on flawed data issue; work on counter	0.70

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Jul 20/2023	CRY	Further emails to attempting to resolve dispute over new data; Email to Lou Peterson noting that we may need him to participate; Additional negotiations regarding amount to be set aside are available for additional potential claims; negotiation on other terms in connection with the increase in data	3.70
Jul 21/2023	RES	Continue discussions and emails on remedy for flawed data; counter; review offer	0.90
Jul 24/2023	RES	Review draft email from Mr. Youtz; conference with Mr. Youtz on counter offer; review email exchange	0.70
Jul 25/2023	RES	Conference with Mr. Youtz; continue discussions on additional funds; research for partial rescission issue	1.20
Jul 25/2023	CRY	Further negotiations regarding amount of additional money to be made available; provide Rick with additional information regarding number of unique individuals and fees incurred for use in motion for preliminary approval	4.10
Jul 26/2023	RES	Review email with data from Mr. Youtz; work into motion and declaration	1.00
Jul 26/2023	CRY	Prepare analysis of claims from database for use in motion for preliminary approval; forward to Rick	2.40
Jul 27/2023	RES	Reach agreement on additional funds, discussion on addendum and other fixes; research for same	3.10
Jul 27/2023	CRY	Reach agreement on additional amount to be available for class members because of additional data disclosed; emails regarding same	0.80
Jul 28/2023	RES	Review data and create RFP to send to potential notice and claims administrators	2.70
Jul 28/2023	CRY	Provide comments to Rick on seeking bids for claim administrators	0.50
Jul 30/2023	CRY	Additional changes to website; add documents and other information to website	1.20
Jul 31/2023	RES	Conference call with Kroll, edit RFP; multiple emails responding to Kroll questions; pull data for Kroll to create proposal; email to Kroll with additional information	4.10
Aug 1/2023	RES	Review and revise addendum; conference with Mr. Youtz regarding key edits and revisions to same; research on same	1.80
Aug 1/2023	CRY	Review of proposed addendum to settlement agreement; email to opposing counsel regarding changes that should be made	2.70
Aug 3/2023	RES	Draft updated short form of notice; draft long form notice; draft proposed order	6.20

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Aug 4/2023	RES	Draft preliminary approval package; draft brief; edit same; respond to questions from administrators on bid package and scope	7.10
Aug 8/2023	RES	Edit and revise approval package	3.50
Aug 8/2023	CRY	Finalize addendum to settlement agreement to add additional \$600,000 available; email to rapid regarding identification of facilities that seem to be mislabeled by state	1.60
Aug 9/2023	RES	Prepare for meeting; conference with multiple representatives of Kroll on ideas for notice plan	2.10
Aug 10/2023	RES	Edit and revise notices; respond to questions from potential administrators on notice issues for bids	2.40
Aug 11/2023	RES	Review bids and proposals from notice firms	1.20
Aug 11/2023	CRY	Revise motion for preliminary approval; send to Rick for review	2.00
Aug 14/2023	RES	Draft detailed declaration in support of approval	5.10
Aug 14/2023	CRY	Letter to Gary Moyer regarding signing settlement agreement; Revisions to short form notice; revisions to long form notice; additional changes to motion for preliminary approval	3.70
Aug 15/2023	RES	Revise motion in light of edits and comments from Mr. Youtz	1.10
Aug 15/2023	CRY	Edits to RES declaration, email to Rapid counsel with drafts of motion for preliminary approval and the notices for his review; question to Rick regarding 140 day requirement for preliminary approval	2.80
Aug 18/2023	RES	Review material from Kroll; conference Zoom call with Kroll on ideas, scope and notice plan; multiple emails on notice issues and scope; review edits from opposing counsel to notice and motion papers	2.20
Aug 18/2023	CRY	Review proposed revisions from counsel for Rapid to motion for preliminary approval	0.60
Aug 20/2023	RES	Review defendants' edits to motion and short form agreement	0.40
Aug 20/2023	CRY	Email exchanges with counsel for Rapid regarding long form and short form notices	0.80
Aug 21/2023	RES	Minor changes and edits to motion for approval filings	0.50
Aug 21/2023	CRY	Additional email exchanges regarding modifications to motion for preliminary approval	1.10
Aug 22/2023	RES	Review and discuss Kroll's proposal for notice; discuss same with Mr. Youtz	1.20

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Aug 22/2023	CRY	Gather materials for filing motion for preliminary approval, including declarations; check local rules regarding same; submit filing	2.40
Aug 23/2023	CRY	Add filings made yesterday to website	0.80
Aug 25/2023	RES	Review email from opposing counsel	0.10
Aug 25/2023	CRY	Provide calculation of number of class members per state for counsel for Rapid to assist in their CAFA notice	1.20
Aug 28/2023	CRY	Prepare spreadsheet for use by Rapid in its CAFA filing	1.60
Sep 1/2023	CRY	Email to counsel for Rapid regarding settlement agreements and scheduling	0.30
Sep 5/2023	CRY	Test website on mobile phones for filing claims; revise website to assist further in making claims by phone	0.80
Sep 6/2023	RES	Lunch meeting with Mr. Rapzzini from Kroll; forward web material to Kroll	2.10
Sep 6/2023	CRY	Further research on whether we need to issue 1099s to class members; Email regarding same; modify Social Security requirement on website so that it is not required	2.10
Sep 7/2023	RES	Review email from Court; revise proposed order; emails to/from opposing counsel	1.00
Sep 7/2023	CRY	Revise and publish website to include Spanish version of all pages; review individual submissions and headings in both versions to make sure they are consistent. Test translation through AI program	3.60
Sep 8/2023	RES	Review and execute proposal for Kroll; review approval order and note deadlines	0.60
Sep 8/2023	CRY	Review order approving settlement process and preliminarily approving agreement	0.20
Sep 11/2023	CRY	Locate and send emails to persons who have previously contacted us to let them know that they can submit claims through the website	2.60
Sep 12/2023	CRY	Continue to locate and send emails to persons who have previously contacted us to let them know that they can submit claims through the website	3.10
Sep 13/2023	CRY	Obtain additional email addresses to contact persons regarding the website	2.80
Sep 14/2023	RES	Draft motion to appoint Kroll; draft proposed order; collect exhibits; email to opposing counsel to review; exchange emails on appointment motion; call to Kroll on status and media plan issues	4.80
Sep 14/2023	CRY	Prepare edits to the motion for appointment of Kroll	0.50
Sep 15/2023	RES	Emails to/from opposing counsel on motion; edit and file motion to appoint	0.40

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Sep 15/2023	CRY	Review claims being received on website; respond to inquiries to releasecard@sylaw.com	0.60
Sep 16/2023	CRY	Review claims being received on website; respond to inquiries to releasecard@sylaw.com	0.80
Sep 18/2023	RES	Collect material from Kroll for motion to approve; draft declaration; discuss appointment with opposing counsel; discuss initial payment with Kroll; email to opposing counsel re same	5.80
Sep 18/2023	CRY	Send emails to persons who contacted us through the firm website to let them know that information about the settlement can be found on the website and that they can file a claim if they are eligible; Review claims being received on website; respond to inquiries to releasecard@sylaw.com	2.10
Sep 19/2023	RES	Draft motion to appoint; review media plan from Kroll; revise declaration	4.10
Sep 19/2023	CRY	Locate additional email addresses to send notices and information regarding the settlement to potential class members	1.60
Sep 20/2023	RES	Edit and revise motion to appoint, declaration and proposed order; email to/from opposing counsel regarding split of initial notice deposit; email to other claims administrators who submitted proposals; respond to questions from other firms on decision	3.80
Sep 20/2023	CRY	Additional emails to potential class members	0.90
Sep 21/2023	RES	Read and review Watkins opposition to Rapid's motion to stay Nevada action; conference with Mr. Youtz; read cases cited in brief	2.00
Sep 21/2023	CRY	Conference with Kroll regarding mailing notices and claims administration	1.20
Sep 22/2023	CRY	Develop program for use with spreadsheets to determine dollar amounts for each recipient for all the cards they were issued considering that some dates of birth are not available and other information may be missing and what type of fuzzy logic will work	3.80
Sep 23/2023	CRY	Download data to spreadsheets for updating and cleaning and making sure fields are consistent for use in calculating damages amounts; prepare programs to examine data and organize for search; prepare additional spreadsheets with usable addresses obtained from prior data and new data prepared from Rapid	6.20

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH FEES

Date	Lwyr	Explanation	Hours
Sep 24/2023	CRY	Continue work on organizing data for approximately 4 million cards for use in processing claims; Review claims being received on website; respond to inquiries to releasecard@syllaw.com	5.80
Sep 25/2023	CRY	Review of claims being submitted online; based on claim submitted make some adjustments to website; check submitted claims against database and mailing list; Upload files to claims administrator for their use	4.70
Sep 27/2023	CRY	Email exchanges with Kroll regarding data provided to them on addresses and other information	0.80
Sep 28/2023	RES	Read and review Rapid's response to opposition to stay in Nevada action; note to file on key cases	1.30
Sep 28/2023	CRY	Provide additional information to Kroll including claim forms and other data	0.60
Sep 29/2023	CRY	Further review and revisions to Spanish version of website	1.10
Sep 30/2023	CRY	Review claims being received on website; respond to inquiries to releasecard@syllaw.com	0.50
Oct 4/2023	RES	Email exchange with Epiq regarding direct/redirect of webpage information and closing letter; email with Mr. Youtz re same	0.20
Oct 12/2023	RES	Review Epiq case closing detail; email regarding webpage issue and redirect	0.30
TOTAL SYSH HOURS			2399.20
	CRY	1106.80 hrs. x \$750	\$ 830,100.00
	RES	1079.60 hrs. x \$750	\$ 809,700.00
	EH	145.50 hrs. x \$750	\$ 109,125.00
	AEM	62.70 hrs. x \$695	\$ 43,576.50
	DSG	4.60 hrs. x 695	\$ 3,197.00
TOTAL SYSH FEES			\$ 1,795,698.50

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH COSTS

DATE	EXPLANATION	AMOUNT	EXH. 3 pg. #
4/5/2019	Buell Realtime Reporting - Court Reporter, J. Reichert Dep 2/5/19	\$498.50	14
4/5/2019	ABC Legal - 3/19/19 Judge's Copy, Reply iso Class Cert.	\$55.00	1
6/6/2019	USDC, Angela Nicolavo - Transcript of 5/28/19 hearing	\$48.60	93
7/12/2019	Arkadin - Conference call 6/11/19	\$12.05	8
7/24/2019	Travel to Bremerton - 7/10/19 for presentation	\$50.36	108-109
7/31/2019	Photocopies - 275@\$.10	\$27.50	
8/29/2019	WA Sec. of State/WSP - Legal research/investigation	\$33.50	105
8/29/2019	Washington State Ferries - Travel 7/10/19, Richard Spoonemore	\$8.50	104
8/29/2019	Working lunches - Client meeting 7/26/19	\$69.24	105
8/29/2019	Been Verified - Legal research/investigation	\$22.86	106
8/29/2019	Washington State Ferries - Travel 7/10/19, Eleanor Hamburger	\$8.50	109
8/31/2019	Photocopies - 281@\$.10	\$28.10	na
9/27/2019	Been Verified	\$22.86	110
10/22/2019	Sherburne City, MN records request fee	\$4.00	100
10/25/2019	Been Verified	\$22.86	111
12/5/2019	Been Verified (2 months)	\$45.72	112
1/22/2020	Been Verified	\$22.86	106
1/31/2020	Photocopies - 158@\$.10	\$15.80	na
2/18/2020	Been Verified	\$22.86	107
4/8/2020	Denton Co., TX Sheriff - Copy charges for PDR	\$1.70	22
4/21/2020	Hamilton Co. Sheriff - Records request fee	\$10.00	135
4/21/2020	Haskell Co. Sheriff - Records request fee	\$13.25	79
4/21/2020	Morgan Co. Sheriff - Records request fee	\$7.38	91
4/21/2020	Butler Co. Treasurer - Records request fee	\$4.00	15
4/25/2020	Newton Co. Sheriff - Records request fee	\$20.20	92
4/25/2020	Chippewa Co. Sheriff - Records request fee	\$2.50	19
5/6/2020	Douglas Co. - Records request fee	\$14.50	24
5/13/2020	Dodge Co., WI Sheriff - records fee	\$3.75	23
5/26/2020	Lancaster Co., SC Detention Center - Records request fee	\$11.03	87-88
5/26/2020	Laurens Co., SC Attorney - Records request fee	\$16.30	89
5/26/2020	Calcasieu Parish Office - Records request fee	\$17.00	16-18
6/23/2020	Pima Co. Sheriff - Records request fee	\$5.00	95-96
6/23/2020	Lexington Co., SC Sheriff - Records request fee	\$6.50	90
6/23/2020	Gallia Co. Sheriff - Records request fee	\$10.00	72
7/14/2020	Sherburne Co., MN - Sheriff - Records request fee	\$12.25	101
7/20/2020	Beaver Co., UT Sheriff - records fee	\$12.00	10
7/24/2020	Geary Co., KS Sheriff - Records request fee	\$23.57	73

DECLARATION OF RICHARD E. SPOONEMORE

Exhibit 2 - Page 1 of 3

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH COSTS

DATE	EXPLANATION	AMOUNT	EXH. 3 pg. #
8/19/2020	Washington Co., OR Sheriff - records fee	\$23.50	114
9/22/2020	Richland Co., SC Sheriff - records fee	\$9.31	97-98
9/22/2020	Fremont Co., CO Sheriff - records fee	\$9.25	70-71
9/23/2020	Scott's Bluff Co. Sheriff - Records request fee	\$14.75	99
10/13/2020	Richland Co., SC Sheriff - records fee (balance)	\$27.94	97-98
10/19/2020	Void check #35548 - lost	(\$23.57)	na
10/19/2020	Geary Co., KS - Records request fee - 2nd check	\$23.57	73
2/12/2021 1/20/21	Buell Realtime Reporting - Court Reporter, G. Moyer Dep	\$995.95	13
5/11/2021	Court Trax - Court file documents	\$25.50	20-21
11/29/2021	Alvarez & Marsol - Expert report retainer	\$5,000.00	3-4
11/29/2021	FedEx - Delivery to 9th Circ . Court of Appeals 12/13/21	\$33.31	65-66
1/13/2022	Alvarez & Marsol - Professional services 11/25/21 - 11/29/21	\$7,048.75	5
1/21/2022	Epiq - Wire for initial funding of notices	\$188,562.32	25-27
1/31/2022	Epiq - Balance due for class notices	\$318,395.00	25-27
6/26/2022	The Benson Hotel - Travel expenses for oral argument	\$377.41	12
8/22/2022	Permit #2277 - USPS bulk mailing	\$2,379.17	113
8/24/2022	WIX - Settlement website	\$178.60	115
8/24/2022	FedEx - Delivery to 9th Circ . Court of Appeals	\$78.14	67
9/2/2022	Mailing supplies	\$73.55	102
9/22/2022	Bulk mailing supplies	\$967.51	76-78
9/29/2022	A-Zar of Washington - Spanish translation	\$142.80	9
10/30/2022	Washington Trust Bank ("WTB") - Finance charge	\$1,488.66	129
11/30/2022	WTB - Finance charge	\$2,675.00	130
12/30/2022	WTB - Finance charge	\$2,718.75	131
1/30/2023	WTB - Finance charge	\$2,906.25	122
2/21/2023	Forms for PCLaw - Envelopes and checks for mailing	\$806.25	68-69
2/28/2023	WTB - Finance charge	\$2,800.00	121
3/20/2023	Hillis Clark Martin - Mediation services	\$4,062.50	82-83
3/20/2023	Epiq - Class action notices	\$809.68	28-29
3/30/2023	WTB - Finance charge	\$2,906.25	120
4/30/2023	WTB - Finance charge	\$3,121.88	123
5/30/2023	WTB - Finance charge	\$3,081.25	124
6/3/2023	Hillis Clark Martin & Peterson - Mediation services	\$487.50	80-81
6/19/2023	Go Daddy - Domain name	\$22.24	74-75
6/30/2023	WTB - Finance charge	\$3,196.87	125
7/18/2023	WIX - Web hosting	\$357.21	133
7/30/2023	WTB - Finance charge	\$3,093.75	126
8/16/2023	WIX - Web hosting	\$381.02	134
8/30/2023	WTB - Finance charge	\$3,303.13	127

Reichert, et al. v. Keefe Commissary Network, L.L.C., et al.
SYSH COSTS

DATE	EXPLANATION	AMOUNT	EXH. 3 pg. #
9/27/2023	Kroll Settlement Services	\$140,000.00	84-86
9/27/2023	Kroll Settlement Services - Notice costs paid by C. Youtz	\$140,000.00	84-86
9/29/2023	Epiq - Professional services	\$100,000.00	30-64
9/30/2023	WTB - Finance charge	\$3,293.75	128
10/19/2023	Epiq - Professional services	\$50,000.00	30-64
10/23/2023	PB Data Services - Coding and private address change	\$248.00	94, 132
10/23/2023	WIX - Web hosting	\$760.66	132
10/23/2023	WTB - Fee for Line of Credit #5518	\$1,450.00	119
10/25/2023	WTB - Finance charge	\$5,206.25	118
10/30/2023	Wolters Kluwer - 2022 Real Rate Report	\$500.00	116-117
11/1/2023	Epiq - Professional services	\$82,523.48	30-64
Total Costs Advanced:		\$1,087,753.69	

Exhibit 3



206-521-9000 | ar@abclegal.com | Tax ID: 91-1153514
633 Yesler Way, Seattle, WA 98104

PAGE 1 of 1

BILLING PERIOD 3/01/2019 - 3/31/2019

ACCOUNT 92130

Sirianni Youtz Spoonemore Hamburger
701 Fifth Avenue Suite 2560
Seattle, WA 98104

Statement Summary

Current Charges	\$55.00
Past Due Charges	\$0.00
Unused Payments & Credits	(\$0.00)
Amount Due	\$55.00
Due Date	5/01/2019

Service Summary

Service Performed	Price	Count	Total
Invoice	\$55.00	1	\$55.00
Total New Charges			\$55.00

Download detailed reports and invoices at
<https://secure.abclegal.com/abc/account/billing>

Open Item Detail

Total Amount Due \$55.00

Date	Case Reference	Service(s)	Invoice #	Amount Due
3/19/2019	7915-001	\$55.00 Invoice	21058945	\$55.00



Pay Online at www.abclegal.com ✓ faster ✓ more secure ✓ credit card or ACH

Finance charges are assessed on all invoices more than 30 days past due and are computed at a monthly rate of .67% which is an annual rate of 8%



November 23, 2021

VIA E-MAIL ONLY

Mr. Richard E. Spoonemore
Sirianni Youtz Spoonemore Hamburger PLLC
3101 Western Avenue, Suite 350
Seattle, WA 98121

**Re: Reichert, Moyer, et al. v. Keefe Commissary, et al.
Retainer Invoice**

Dear Mr. Spoonemore:

Please find attached an invoice for the professional retainer pursuant to our engagement letter, dated November 23, 2021, regarding consultation/litigation support services, in connection with the above-referenced matter.

If you have any questions, please contact Char Connolly at 206.664.8958.

Sincerely,

A handwritten signature in black ink, appearing to read 'Neil J. Beaton', written over a faint, larger version of the same signature.

Neil J. Beaton, CPA/ABV/CFF, CFA, ASA
Managing Director

NJB:cac
Attachment



Alvarez & Marsal Valuation Services, LLC

1111 Third Avenue – Suite 2450

Seattle, WA 98101

Phone: +1 206 664 9000

Fax: +1 206 664 8901

November 23, 2021

VIA E-MAIL ONLY

Mr. Richard E. Spoonemore
Sirianni Youtz Spoonemore Hamburger PLLC
3101 Western Avenue, Suite 350
Seattle, WA 98121

**Re: Reichert, Moyer, et al. v. Keefe Commissary, et al.
Retainer Invoice**

<u>Description</u>	<u>Amount</u>
Client Retainer, per Engagement Letter	<u>\$5,000</u>

Please make check payable to ***Alvarez & Marsal Valuation Services, LLC.***

Mailing Instructions:

Alvarez & Marsal Valuation Services, LLC
Attn: Char Connolly
1111 Third Avenue, Suite 2450
Seattle, WA 98101

*** Please note that Alvarez & Marsal Valuation Services, LLC does not accept credit card payments. ***

*** Banking details for electronic payment can be provided upon request. ***



January 12, 2022

VIA E-MAIL ONLY

Mr. Richard E. Spoonemore
Sirianni Youtz Spoonemore Hamburger PLLC
3101 Western Avenue, Suite 350
Seattle, WA 98121

**Re: Reichert, Moyer, et al. v. Keefe Commissary, et al.
Invoice #835426-1**

Dear Mr. Spoonemore:

Attached please find an invoice for the services rendered by Alvarez & Marsal Valuation Services, LLC regarding consultation/litigation support services in connection with the above-referenced matter. These services were performed in accordance with our engagement letter effective November 23, 2021.

If you have any questions, please do not hesitate to contact Kalee Auvil at 206.664.8945.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Neil J. Beaton', written over a white background.

Neil J. Beaton, CPA/ABV/CFF, CFA, ASA
Managing Director

NJB:kda
Attachment



January 12, 2022

VIA E-MAIL ONLY

Mr. Richard E. Spoonemore
 Sirianni Youtz Spoonemore Hamburger PLLC
 3101 Western Avenue, Suite 350
 Seattle, WA 98121

**Re: Reichert, Moyer, et al. v. Keefe Commissary, et al.
 Invoice #835426-1**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
11/25/21	Van Zandt, Arik	Analysis and report review	3.00
11/18/21	Thomas, Benjamin	Client meetings/calls	0.50
11/22/21	Thomas, Benjamin	Research and analysis	2.00
11/23/21	Thomas, Benjamin	Report preparation	1.25
11/23/21	Thomas, Benjamin	Research and analysis	11.25
11/23/21	Thomas, Benjamin	Client meetings/calls	1.00
11/29/21	Thomas, Benjamin	Client meetings/calls	1.50
11/29/21	Thomas, Benjamin	Research and analysis	2.50
11/29/21	Connolly, Charlotte	Proof/edit expert report and exhibits; prepare and issue complete final PDF	1.00

<u>Summary</u>	
Professional Fees	\$ 11,475.00
Administrative Fee @ 5%	573.75
Total Fees	\$ 12,048.75
Prepayment Applied	(5,000.00)
TOTAL DUE	\$ 7,048.75

If paying by check, please make payable to **Alvarez & Marsal Valuation Services, LLC**.

Mailing Instructions:

Alvarez & Marsal Valuation Services, LLC
 Attn: Liz Carrington
 600 Madison Avenue
 8th Floor

Wire Instructions:

Bank: J.P. Morgan Chase
 ABA #: 021000021
 Account Name: Alvarez & Marsal Valuation Services, LLC
 Account #: 938861416



Final Details for Order #111-9903720-7784202

[Print this page for your records.](#)

Order Placed: August 19, 2022
Amazon.com order number: 111-9903720-7784202
Order Total: \$5.27

Shipped on August 20, 2022

Items Ordered	Price
1 of: <i>Alliance Rubber 24645 Sterling Rubber Bands Size #64, 1 lb Box Contains Approx. 425 Bands (3 1/2 x 1/4-Inches, Natural Crepe)</i> Sold by: Amazon.com Services LLC	\$4.78
Condition: New	

Shipping Address:
Chris R Youtz
2745 Mt. St. Helen's Pl. S.
Seattle, WA 98144
United States

Shipping Speed:
FREE Prime Delivery

Payment information

Payment Method:
Visa | Last digits: 7037

Item(s) Subtotal: \$4.78
Shipping & Handling: \$0.00

Billing address
Chris Youtz
3101 WESTERN AVE STE 350
SEATTLE, WA 98121-3017
United States

Total before tax: \$4.78
Estimated tax to be collected: \$0.49

Grand Total: \$5.27

Credit Card transactions

Visa ending in 7037: August 20, 2022: \$5.27

To view the status of your order, return to [Order Summary](#).

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Final Details for Order #111-9611900-8229826

[Print this page for your records.](#)

Order Placed: August 10, 2022
Amazon.com order number: 111-9611900-8229826
Order Total: \$7.61

Shipped on August 10, 2022

Items Ordered	Price
1 of: <i>Sweetzer & Orange 300gsm 4x6" Postcard Paper Cardstock (Both Sides Blank) For Art or Blank Postcards for Mailing. Set of 60 White Blank Post Cards, Printable Postcards Set. Bulk Post Card Pack.</i> Sold by: LightRail (seller profile)	\$6.99
Condition: New	

Shipping Address:
Chris Youtz
3094 SEA EAGLE LN
GREENBANK, WA 98253-6107
United States

Shipping Speed:
FREE Prime Delivery

Payment information

Payment Method:
Visa | Last digits: 7037

Item(s) Subtotal: \$6.99
Shipping & Handling: \$0.00

Billing address
Chris Youtz
3101 WESTERN AVE STE 350
SEATTLE, WA 98121-3017
United States

Total before tax: \$6.99
Estimated tax to be collected: \$0.62

Grand Total: \$7.61

Credit Card transactions

Visa ending in 7037: August 10, 2022: \$7.61

To view the status of your order, return to [Order Summary](#).

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an
NII Communications
Company

USAGE DETAILS

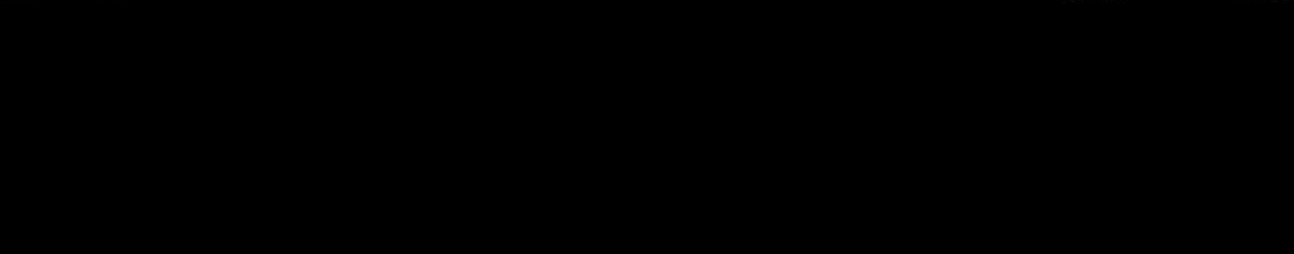
Sirianni Youtz Spoonemore

Usage Period	06/01/2019 - 06/30/2019	Bill-to Customer No.	C249363
USAGE Total Amount	\$ 28.981	Invoice No.	USINV190645684
Amounts in	USD	Page	1/1

DT : Domestic Toll DTF : Domestic Toll Free ITS : International Toll ITFS : International Toll Free DO : Dial Out

Date-Time	Origin	Caller#	Dialed#	Mod.	BillingCode	Cnx	Min	Charges	Tax&Fee	AMOUNT
Sirianni Youtz Spoonemore										
						16	291	\$ 20.661	\$ 8.320	\$ 28.981
Theresa Redfern										
						16	291	\$ 20.661	\$ 8.320	\$ 28.981
48696XXX										
						16	291	\$ 20.661	\$ 8.320	\$ 28.981
ArkadinAnytime Minute + ArkadinAnywhere Minute										
						16	291	\$ 20.661	\$ 8.320	\$ 28.981
Audio Classic										
						12	217	\$ 15.407	\$ 6.205	\$ 28.981
Audio-Dial-In										
						3	121	\$ 8.591	\$ 3.460	\$ 12.051
Jun.-Tuesday 11 14:57-15:37										
14:57 - 15:37	US-DTF	+12062230303	+18007049804	Yes			41	\$ 2.911	\$ 1.172	\$ 4.083
14:58 - 15:37	US-DTF	+1612333434	+18007049804	No			40	\$ 2.840	\$ 1.144	\$ 3.984
14:58 - 15:37	US-DTF	+18166913382	+18007049804	No			40	\$ 2.840	\$ 1.144	\$ 3.984

-7915-00



						4	74	\$ 5.254	\$ 2.116	\$ 28.981
Audio-Recording										
						1	41	\$ 2.911	\$ 1.172	\$ 4.083
Jun.-Tuesday 11 14:57-15:37										
14:57 - 15:37		2222		No			41	\$ 2.911	\$ 1.172	\$ 4.083



End of Usage Details

Surcharges apply for international and non-continental US rates for both reservationless and operator-assisted services. Arkadin bills in full minute increments, from the first full minute of the call until the last minute of the call as per industry standard. Additional charges apply for premium services and recordings. For customers whose service contracts with Arkadin have expired or the initial term of which has lapsed, Arkadin reserves the right to make any pricing adjustment as it deems appropriate or necessary. In addition to its Client Rates for services, Arkadin assesses 1) a Federal Universal Service Fund fee ("FUSF") to recover Federal USF contribution costs, 2) state, local and city taxes paid to governmental entities and 3) an administrative fee to help defray its costs incurred with telecom carrier costs, regulatory requirements and administration of the Arkadin service. For additional information, see www.arkadin.com/terms-of-use.

Invoice

Claudia A' Zar Spanish Interpreter
 A-Zar of Washington Inc.
 Federal & WA. St. Certified
 4742 42nd Ave. SW #543
 Seattle, WA 98116
 (206) 240-1489

DATE	INVOICE #
09/26/22	SYSH-2

BILL TO
Sirianni Youtz Spoonemore Hamburger PLLC Attn: Accounts Payable c/o Ele Hamburger 3101 Western Ave., Ste. 350 Seattle, WA 98121 Phone: 206-838-1809

DESCRIPTION	QTY	RATE	AMOUNT
Spanish Translation Services Request made by: Ele Hamburger RE: Reichert v. Keefe Settlement Claim Form -208 words	208	.20	41.60
Notice for Kitsap County -506	506	.20	101.20
Mileage round trip	--	.---	---
Parking fee	--	---	--
FEDERAL TAX ID NUMBER 20-06-71458			
		Total	\$142.80



Beaver County Sheriff's Office

Beaver County Sheriff's Office

2270 South 525 West - Beaver, UT 84713

Do not use this page to pay for Traffic Violations.

[Click here](#) to pay for traffic violations.

Grama Request:	\$10.50	Quantity: 1	Item Subtotal: \$10.50
Case Number, Incident Number, or Description Sirianni Youtz Spoonemore Hamburger PLLC request dated 06/02/2020			
Grama Request CD/DVD:	\$25.00	Quantity: 0	Item Subtotal: \$0.00
Grama Request Body Cam Video:	\$0.00		Item Subtotal: \$0.00
Case Number, Incident Number, or Description			
Grama Request Other:	\$0.00		Item Subtotal: \$0.00
Civil Process to Beaver County Jail:	\$22.50	Quantity: 0	Item Subtotal: \$0.00
Civil Process to Adamsville:	\$52.50	Quantity: 0	Item Subtotal: \$0.00
Civil Process to Beaver:	\$27.50	Quantity: 0	Item Subtotal: \$0.00
Civil Process to Eagle Point:	\$72.50	Quantity: 0	Item Subtotal: \$0.00
Civil Process to Greenville:	\$42.50	Quantity: 0	Item Subtotal: \$0.00
Civil Process to Manderfield:	\$50.00	Quantity: 0	Item Subtotal: \$0.00
Civil Process to Minersville:	\$72.50	Quantity: 0	Item Subtotal: \$0.00
Civil Process to Milford:	\$107.50	Quantity: 0	Item Subtotal: \$0.00
Civil Process to North Creek:	\$40.00	Quantity: 0	Item Subtotal: \$0.00
Civil Process to Indian Creek:	\$60.00	Quantity: 0	Item Subtotal: \$0.00
Civil Process to Sulphurdale:	\$72.50	Quantity: 0	Item Subtotal: \$0.00
Other Civil Process:	\$0.00		Item Subtotal: \$0.00
Who is being served?			
Right of Access (Criminal History, Background):	\$10.00	Quantity: 0	Item Subtotal: \$0.00
Driver Privilege Card:	\$20.00	Quantity: 0	Item Subtotal: \$0.00
			Total: \$10.50

Payers Information

Chris Youtz
 3101 Western Ave. Ste. 350
 Seattle, WA, 98121
 206-223-0303
 theresa@syllaw.com

Payment Information:

Account: V*7037

Please be aware that credit card payments will reflect on your statement as County UT 8007640844 ClintonUT

Submission Receipt:

Subtotal: \$10.50
Processing Fee: \$1.50
Total: \$12.00
Processing Date: 3 Jun 2020 1:44 pm MDT
 Payment processed successfully.
Confirmation #: 5ed7fdb4-SIP-70738

Thank-you.

HERITAGE BANK

SYSH PLLC
BL ACCT



RECEIVED

Page 1 of 6

JUN 13 2022

SCORECARD

Bonus Points Available
5,000

Sirianni Youtz
Spoonemore Hamburger PLLC
Account Summary

Account Inquiries



Customer Service: (800) 423-7503
Report Lost or Stolen Card: (727) 570-4881



Visit us on the web at:
www.MyCardStatement.com



Please send Billing Inquiries and Correspondence to:
CUSTOMER SERVICE PO BOX 30495 TAMPA, FL 33630

Payment Summary



PAYMENT DUE DATE

06/25/2022

NOTE: Grace period to avoid a finance charge on purchases, pay entire new balance by payment due date. Finance charge accrues on cash advances until paid and will be billed on your next statement.

Important Information About Your Account

MANAGE YOUR CARD ACCOUNT ONLINE. IT'S FREE! IT'S EASY! SIMPLY GO TO WWW.MYCARDSTATEMENT.COM AND ENROLL IN OUR ONLINE SERVICE. YOU CAN REVIEW ACCOUNT INFORMATION, TRACK SPENDING, SET ALERT SERVICE, NOTIFICATIONS, DOWNLOAD FILES, AND MUCH MORE. MANAGING YOUR ACCOUNT IS FAST, SECURE, AND EASY WITH MYCARDSTATEMENT.COM. ENROLL TODAY!

PLEASE DETACH COUPON AND RETURN PAYMENT USING THE ENCLOSED ENVELOPE - ALLOW UP TO 7 DAYS FOR RECEIPT

HERITAGE BANK
3615 PACIFIC AVE
TACOMA WA 98418 - 7921

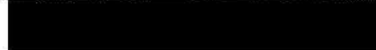
Check box to indicate name/address change on back of this coupon

AMOUNT OF PAYMENT ENCLOSED

Closing Date

05/31/22

New Balance



Total Minimum Payment Due

Payment Due Date

06/25/2022



SYSH PLLC
BL ACCT
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871



MAKE CHECK PAYABLE TO:



VISA
PO BOX 4512
CAROL STREAM IL 60197-4512

DECLARATION OF RICHARD E. SPOONEMORE

EXHIBIT 3 - Page 11 of 135

12 4811 8320 0009 6997 00016300 00540069 5

SVB P L L C
BI ACCT

HERITAGE BANK



AMT: 16.52 TC 05/00

Cardholder Account Summary

CHRIS R YOUTZ

Cardholder Account Detail

Trans Date	Post Date	MCC Code	Reference Number	Description	Amount
------------	-----------	----------	------------------	-------------	--------

05/07/22	05/08/22	7011	24055222127722330991622	THE BENSON HOTEL 5032282000 OR	\$377.41
AMT: 377.41 TC 05/00					

INVOICE

1 of 1



Chris R. Youtz
Sirianni Youtz Spoonemore Hamburger
701 Fifth Avenue
Suite 2560
Seattle, WA 98104

Invoice No.	Invoice Date	Job No.
66311	2/6/2021	50535
Job Date	Case No.	
1/20/2021	3:17-cv-05848-BHS	
Case Name		
Reichert v. Keefe Commissary Network, L.L.C., et al.		
Payment Terms		
Due upon receipt		

Certified Copy of Transcript:

Gary Moyer	235.00 Pages	904.75
Digitally Certified Electronic Transcript: E-Tran and PDF Format	1.00	45.00
Exhibit Production	77.00	46.20
TOTAL DUE >>>		\$995.95

***** COMPLIMENTARY VIDEOCONFERENCE / TELECONFERENCE *****

In support of our legal community during the current pandemic, Buell is offering complimentary videoconference and/or teleconference connections for all depositions. Call or email today with any questions and/or to schedule a demo.

In an effort to further reduce litigation costs, the original-ordering party may decline a physical sealed original transcript. Please let us know if you would like to hold off on receiving the physical transcript, and your transcript charges will be reduced by 7%, in addition to any associated delivery fee.

The physical sealed original transcript can be ordered at any future date, with standard turnaround being 3-5 business days. As always, expedited delivery will be available if needed sooner.

We appreciate your business!

Buell is in compliance with WAC 308-14-130(1) in offering court reporting services and fees to all parties on equal terms.

Tax ID: 91-2101641

Please detach bottom portion and return with payment.

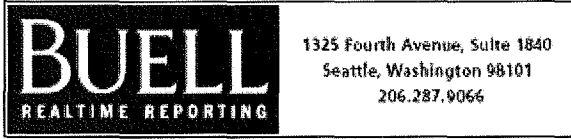
Chris R. Youtz
Sirianni Youtz Spoonemore Hamburger
701 Fifth Avenue
Suite 2560
Seattle, WA 98104

Invoice No. : 66311
Invoice Date : 2/6/2021
Total Due : \$995.95

Remit To: **BUELL REALTIME REPORTING, LLC**
1325 Fourth Avenue
Suite 1840
Seattle, WA 98101
OF RICHARD E. SPOONEMORE
EXHIBIT 3 - Page 13 of 135

Job No. : 50535
BU ID : MAIN
Case No. : 3:17-cv-05848-BHS
Case Name : Reichert v. Keefe Commissary Network, L.L.C., et al.

STATEMENT



Account No.	Date
C8477	3/25/2019

Current	30 Days	60 Days
\$0.00	\$498.50	\$0.00
90 Days	120 Days & Over	Total Due
\$0.00	\$0.00	\$498.50

Richard E. Spoonemore
 Sirianni Youtz Spoonemore Hamburger
 701 Fifth Avenue
 Suite 2560
 Seattle, WA 98104

Page 1 of 1

Invoice Date	Invoice No.	Balance	Job Date	Witness	Case Name
2/21/2019	51963	498.50	2/5/2019	Jeffrey Reichert	Reichert v. Keefe Commissary Network, L.L.C., et al.

Tax ID: 91-2101641

Please detach bottom portion and return with payment.

Richard E. Spoonemore
 Sirianni Youtz Spoonemore Hamburger
 701 Fifth Avenue
 Suite 2560
 Seattle, WA 98104

Account No. : C8477
 Date : 3/25/2019
Total Due : \$ 498.50

Remit To: **BUPELL REALTIME REPORTING, LLC**
1325 Fourth Avenue
Suite 1840
Seattle, WA 98101

DECLARATION OF RICHARD E. SPOONEMORE
 EXHIBIT 3 - Page 14 of 135

PAYMENT WITH CREDIT CARD				
Cardholder's Name: _____				
Card Number: _____				
Exp. Date: _____		Phone#: _____		
Billing Address: _____				
Zip: _____		Card Security Code: _____		
Amount to Charge: _____				
Cardholder's Signature: _____				
Email: _____				

DATE : Apr/21/2020
CHE # : 35495
AMOUNT : \$4.00
ACCOUNT: GENERAL - 98
PAID TO: BUTLER COUNTY TREASURER
705 HANOVER ST
HAMILTON
OH
45011

Records Request Fee

CLIENT: 7915 - Reichert, Jeffrey
MATTER: 7915-001

35495

Four ***** 00/100

Apr/21/2020 \$4.00

BUTLER COUNTY TREASURER
705 HANOVER ST
HAMILTON, OH 45011

Records Request Fee

DATE : Apr/21/2020
CHE # : 35495
AMOUNT : \$4.00
ACCOUNT: GENERAL - 98
PAID TO: BUTLER COUNTY TREASURER
Records Request Fee
7915 - Reichert, Jeffrey
MATTER :7915-001
LAWYER :Chris R. Youtz

** GENERAL BALANCES **

[REDACTED]

Jeffrey Reichert v. Keefe Commissary Network, L.L.C., et al.



Calcasieu Parish Sheriff's Office

TONY MANCUSO, SHERIFF AND EX-OFFICIO TAX COLLECTOR

Office of the In-House Counsel

PO Box 2185 • Lake Charles, Louisiana 70602
Phone: (337) 491-3622 • Fax: (337) 433-6326

May 12, 2020

RECEIVED

Chris R. Youtz
3101 Western Ave.
Suite 350
Seattle, WA 98121

MAY 15 2020

Sirianni Youtz
Spoonemore Hamburger PLLC

RE: Public Records Request –
Inmate Personal Funds by Chris Youtz

Dear Sir/Madam:

We are in receipt of your public records request issued to the Calcasieu Parish Sheriff's Office, reference the above.

At this time, the public records information that can be provided consists of 17 pages.

The cost for duplicating this report is \$10.00 for the first 10 pages of any report and \$1.00/per page after the first 10 pages, and I have attached a statement for your records. Upon receipt of payment, the report will be forwarded to you.

Payment in the form of check or money order only, may be made and submitted to:

Calcasieu Parish Sheriff's Office
PO BOX 2185
LAKE CHARLES LA 70602

If you prefer to obtain copies in person, you can bring your check or money order and pick up the record(s) on the second floor of the Magnolia Life Building, Suite 203 which is located at 1011 Lakeshore Drive, Lake Charles LA 70601

Should you have any questions, please do not hesitate to contact this office.

Sincerely


Mary Hamolka
Paralegal to Rob McCorquodale



Calcasieu Parish Sheriff's Office

TONY MANCUSO, SHERIFF AND EX-OFFICIO TAX COLLECTOR

Office of the In-House Counsel

PO Box 2185 • Lake Charles, Louisiana 70602
Phone: (337) 491-3622 • Fax: (337) 433-6326

May 12, 2020

**Chris R. Youtz
3101 Western Ave.
Suite 350
Seattle, WA 98121**

RE: Public Records Request –
Inmate Personal Funds by Chris Youtz

STATEMENT

Copies of Requested Public Records costs:

17 at \$1.00/page	\$17
Balance Due:	\$17

Please be advised that this office does **NOT** accept cash, credit cards, debit cards or temporary checks.

Acceptable forms of payment include Money Orders, Business Checks, Cashier Checks, and properly printed personal checks (additional information for personal checks may be required).

Payments should be submitted to:
Calcasieu Parish Sheriff's Office
PO BOX 2185
LAKE CHARLES LA 70602

Thank you in advance for your prompt payment.
Kindly return a copy of this statement with your payment.



Calcasieu Parish Sheriff's Office
TONY MANCUSO, Sheriff and Ex-Officio Tax Collector

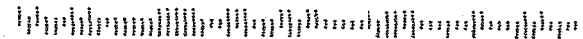
Office of the In-House Counsel
P.O. Box 2185, Lake Charles, Louisiana 70602

TONY MANCUSO
05/12/20
12 MAY 20
PM 5 L

neopost
05/12/2020
FIRST-CLASS MAIL
US POSTAGE \$000.50⁰⁰
ZIP 70601
041L11252591

Chris R. Youtz
3101 Western Avenue
Suite 350
Seattle, WA 98121

98121-387175



DATE : Apr/25/2020
CHE # : 35501
AMOUNT : \$2.50
ACCOUNT: GENERAL - 98
PAID TO: CHIPPEWA COUNTY SHERIFF'S OFFICE
32 E SPRUCE ST
CHIPPEWA FALLS
WI
54729

Records Request Fee

CLIENT: 7915 - Reichert, Jeffrey
MATTER: 7915-001

35501

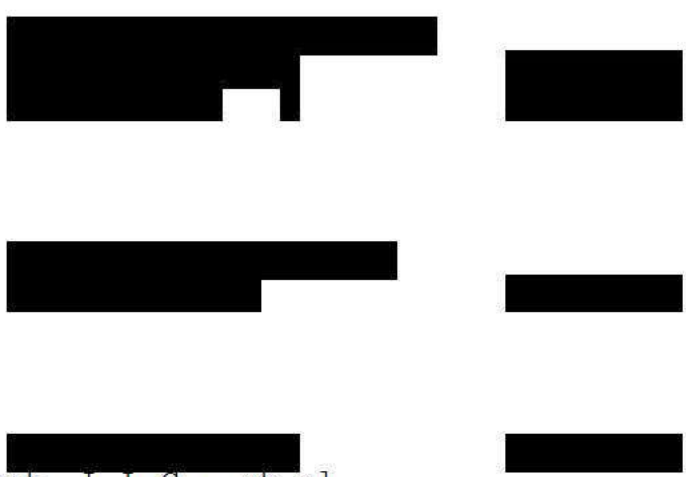
Two ***** 50/100

Apr/25/2020 \$2.50


CHIPPEWA COUNTY SHERIFF'S OFFICE
32 E SPRUCE ST
CHIPPEWA FALLS, WI 54729

Records Request Fee

DATE : Apr/25/2020
CHE # : 35501
AMOUNT : \$2.50
ACCOUNT: GENERAL - 98
PAID TO: CHIPPEWA COUNTY SHERIFF'S OFFICE
Records Request Fee
7915 - Reichert, Jeffrey
MATTER :7915-001
LAWYER :Chris R. Youtz



Jeffrey Reichert v. Keefe Commissary Network, L.L.C., et al.

			
<p><i>Nationwide Court Record Searching and Document Retrieval available! Contact us for details!</i></p>			
<p>CourtTrax Search Detail Report</p>		<p>For Apr 2021</p>	
<p>Sirianni Youtz Spoonemore Hamburger</p>			
<p>Stacy Hoffman</p>	<p>username:sthoffman - ENABLED</p>	<p>Total Cost:</p>	<p>\$0.00</p>
<p>Theresa Redfern</p>	<p>username:tredfern - ENABLED</p>	<p>Total Cost:</p>	<p>\$62.50</p>
		<p>Monthly Cost:</p>	<p>\$62.50</p>

Client Matter ID	TransID	User	Date/Time	Court	Search Type	Hits	Title	Cost Code	Cost
7915-001	20447555	Theresa Redfern	2021-04-13 18:32:24	WA-D&M	Case Detail		7915-001: 8Z0629140 - WA Dist & Municipal Snohomish County	STD	\$2.50
7915-001	20447557	Theresa Redfern	2021-04-13 18:33:21	WA-D&M	(Civil) Name		7915-001: Sanchez, Jordan - WA Dist & Municipal cases Snohomish County EVD Court	STD	\$2.50
7915-001	20447558	Theresa Redfern	2021-04-13 18:34:30	WA-D&M	Case Detail		7915-001: 8Z0629140 - WA Dist & Municipal Snohomish County	STD	\$2.50
7915-001	20447560	Theresa Redfern	2021-04-13 18:34:32	WA-D&M	Case Detail		7915-001: 8Z0629140 - WA Dist & Municipal Snohomish County	STD	\$2.50
7915-001	20447577	Theresa Redfern	2021-04-13 18:43:12	WA-D&M	Case Detail		7915-001: PC18D1476 - WA Dist & Municipal Snohomish County	STD	\$2.50
7915-001	20447593	Theresa Redfern	2021-04-13 18:45:55	WA-D&M	(Civil) Name		7915-001: Sanchez, Jordan - WA Dist & Municipal cases Snohomish County EGD Court	STD	\$2.50
7915-001	20447597	Theresa Redfern	2021-04-13 18:47:41	WA-D&M	(Non-Civil) Name		7915-001: Sanchez, Jordan - WA Dist & Municipal names Statewide *SW Court	INTR	\$0.00
7915-001	20447605	Theresa Redfern	2021-04-13 18:48:41	WA-D&M	(Non-Civil) Name		7915-001: Sanchez, Jordan - WA Dist & Municipal cases Statewide *SW Court	STD	\$3.00
7915-001	20447638	Theresa Redfern	2021-04-13 19:00:31	WA-Sup Pierce	Case Detail		7915-001: 18-1-04498-9 - WA Superior Pierce County	STD	\$2.50
7915-001	20447641	Theresa Redfern	2021-04-13 19:03:02	WA-D&M	(Civil) Name		7915-001: Sanchez, Jordan - WA Dist & Municipal cases Snohomish County SOD Court	STD	\$2.50
7915-001	20447643	Theresa Redfern	2021-04-13 19:03:31	WA-D&M	(Civil) Name		7915-001: Sanchez, Jordan - WA Dist & Municipal cases Snohomish County CAS Court	STD	\$2.50
								Total Cost:	\$25.50

Remit To:

Denton County Sheriff's Office
 127 N. Woodrow Lane
 Denton, TX 76205

Bill To:

Chris Youtz
 3101 Western Avenue, Suite 350
 Seattle, WA 98121

I Invoice Summary

Invoice No: INV20-S003569-1
 Request Reference Number: S003569-040120
 Invoice Date: 4/8/2020
 Due Date: 4/23/2020
 Status: Open
 Balance Due \$1.70

Category	Description	Details	Cost	Unit	Add Overhead	Total Quantity	Quantity Waived	Quantity Charged	Total
Copy Fees	Standard Copies	The charge for standard paper copies reproduced by means of an office machine copier or a computer printer.	\$0.10	Per Page	<input type="checkbox"/>	27.00	10.00	17.00	\$1.70

Comments:

Totals:

Total: \$1.70
 Payments: \$0.00
 Balance Due **\$1.70**

DECLARATION OF RICHARD E. SPOONEMORE

Thank you for promptly remitting payment for these services. We hope to be able to continue to serve you in the future.



Government Payment Service
GovPayNet
7820 Innovation Boulevard Suite 250
Indianapolis, IN 46278
24hr. Customer Service #: 888-604-7888

Civil And Record Payments Payment Confirmation (Ref #: 28425382)

PLC: Dodge County Sheriff's Office
4107 124 West Street
Juneau, Wisconsin 53039
For: Civil And Record Payments

Date: 04/23/2020 19:26 EDT

TRANSACTION INFORMATION

Name: Chris Youtz
Address: 3101 Western Ave.
Suite 350
Seattle, Wa 98121
Phone Number: (206)223-0303
Email Address: Theresa@sylaw.com
Payment Type: Record Request
Case #: Sirianni Youtz Spoonemore Hamburger PLLC

Transaction Reference #: 28425382
Transaction Date/Time: 04/23/2020 19:26 EDT

BILLING INFORMATION

Name: Chris Youtz
Address: 3101 Western Ave.
Suite 350
City, State Zip: Seattle, Wa 98121
Phone #: (206)223-0303
Card #: xxxx-xxxx-xxxx-7037

PAYMENT INFORMATION

Approval #: 003613
Payment Amount: \$2.00
Service Fee: \$1.75
Total Amount: \$3.75

The service fee is not refundable.

ATTENTION CARDHOLDER
If you have questions about the processing of your payment, please call GovPayNet at 888-604-7888.

Thank you for using GovPayNet

DATE : May/ 6/2020
CHE # : 35504
AMOUNT : \$14.50
ACCOUNT: GENERAL - 98
PAID TO: DOUGLAS COUNTY
1036 SE DOUGLAS AVE CH RM 301
ROSEBURG
OR
97470

Records Request

CLIENT: 7915 - Reichert, Jeffrey
MATTER: 7915-001

35504

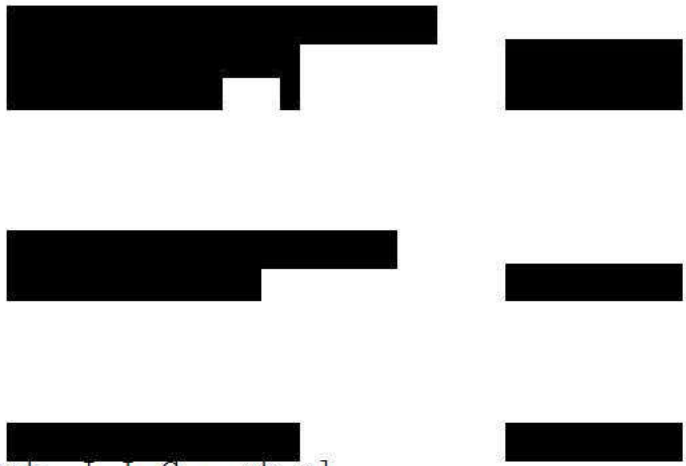
Fourteen ***** 50/100

May/ 6/2020 \$14.50

DOUGLAS COUNTY
1036 SE DOUGLAS AVE CH RM 301
ROSEBURG, OR 97470

Records Request

DATE : May/ 6/2020
CHE # : 35504
AMOUNT : \$14.50
ACCOUNT: GENERAL - 98
PAID TO: DOUGLAS COUNTY
Records Request
7915 - Reichert, Jeffrey
MATTER :7915-001
LAWYER :Chris R. Youtz



Jeffrey Reichert v. Keefe Commissary Network, L.L.C., et al.



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

Remit to
Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286

Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:
Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90623679 Invoice Date 03/10/2022
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: Start to 02/28/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
25	Notice Plan	188,562.320	EA	1.0000	188,562.32
30	Import and Standardize Data	1	EA	1,000.0000	1,000.00
40	Forms Setup & Mailing Coordination	6	EA	1,000.0000	6,000.00
60	National Change of Address (\$2 per 1000)	847,192	EA	0.0020	1,694.38
70	Print/Fold Notice & Claim packet	821,139	EA	0.0300	24,634.17
80	Record Undeliverable Mail	7,509	EA	0.1900	1,426.71
90	Enter Change of Address - Postal Forward	139	EA	0.4500	62.55
100	Address Research 1-50K	7,084	EA	0.1500	1,062.60
110	Postcard Notice Remails	2,860	EA	0.1000	286.00
120	Full Notice Request Fulfillment	7	EA	1.5000	10.50
Website and Reporting					
140	Static Website Deployment and Testing	2	EA	1,500.0000	3,000.00
150	Website Hosting	1	EA	150.0000	150.00



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

Information

Invoice No.	90623679	Invoice Date	03/10/2022
Purchase Order No.			
Customer No.	3012071		

Comments

Billing Period: Start to 02/28/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Call Center & Class Member Comm					
170	IVR Configuration and Recording	2	EA	2,000.0000	4,000.00
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	2,745.200	EA	0.1900	521.59
200	Notice Request Transcription	205	EA	0.7500	153.75
210	Opt out and Objection Reporting	2	EA	3.7500	7.50
Postage & Expenses					
230	Postage	243,072.447	DLR	1.0000	243,072.45
245	Translation	1,983.500	DLR	1.0000	1,983.50
Standard Rates					
260	Clerical - Production	6	H	50.0000	300.00
270	Clerical - Document Control	0.900	H	50.0000	45.00
280	Data Entry	0.400	H	50.0000	20.00
330	Claims Analyst	0.400	H	75.0000	30.00
333	Mailing Coordinator	33.500	H	75.0000	2,512.50
345	Account Reconciliation	0.500	H	85.0000	42.50
350	Project Coordinators	66.200	H	90.0000	5,958.00
370	Data Analyst & Reporting	43.200	H	150.0000	6,480.00
380	Project Managers	60.500	H	150.0000	9,075.00
405	Software Engineer	9.200	H	190.0000	1,748.00

DECLARATION OF RICHARD E. SPOONEMORE
 EXHIBIT 3 - Page 26 of 135



CONFIDENTIAL



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

Information			
Invoice No.	90623679	Invoice Date	03/10/2022
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: Start to 02/28/2022

Item	Service	Quantity	Unit	Unit Price	Amount
490	Box Storage	2	EA	3.5000	7.00
	Hilsoft Billing Rates				
540	Researcher	5.800	H	200.0000	1,160.00
550	Associate Planner	11.100	H	190.0000	2,109.00
570	Notice Coordinator	10.800	H	135.0000	1,458.00
Net Amount					508,723.02
Sales Tax					3,507.33
Less Deposit Applied					-506,957.32
Total Amount Due					5,273.03





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

Remit to
Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286
Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:
Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90711610 Invoice Date 01/31/2023
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: 01/01/2023 - 01/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	18	EA	0.1900	3.42
100	Address Research 1-50K	10	EA	0.1500	1.50
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	242.970	EA	0.1900	46.16
200	Notice Request Transcription	25	EA	0.7500	18.75
Standard Rates					
350	Project Coordinators	2.100	H	90.0000	189.00
380	Project Managers	1.600	H	150.0000	240.00
490	Box Storage	3	EA	3.5000	10.50
Net Amount					809.33





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

Information			
Invoice No.	90711610	Invoice Date	01/31/2023
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 01/01/2023 - 01/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
	Sales Tax				0.35
	Total Amount Due				809.68





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

Remit to
Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286
Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:
Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90634715 Invoice Date 04/30/2022
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: 04/01/2022 - 04/30/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	12,472	EA	0.1900	2,369.68
90	Enter Change of Address - Postal Forward	151	EA	0.4500	67.95
100	Address Research 1-50K	11,356	EA	0.1500	1,703.40
110	Postcard Notice Remails	40	EA	0.1000	4.00
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	1,985.430	EA	0.1900	377.23
200	Notice Request Transcription	231	EA	0.7500	173.25
210	Opt out and Objection Reporting	46	EA	3.7500	172.50
Postage & Expenses					
230	Postage	7,701.396	DLR	1.0000	7,701.40





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

Information			
Invoice No.	90634715	Invoice Date	04/30/2022
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 04/01/2022 - 04/30/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Standard Rates					
310	Contact Center (shared)	30	MIN	1.0500	31.50
330	Claims Analyst	4	H	75.0000	300.00
333	Mailing Coordinator	18.700	H	75.0000	1,402.50
335	Correspondence Review and Response	38.500	H	75.0000	2,887.50
350	Project Coordinators	7.900	H	90.0000	711.00
370	Data Analyst & Reporting	1.500	H	150.0000	225.00
380	Project Managers	10	H	150.0000	1,500.00
405	Software Engineer	1.300	H	190.0000	247.00
490	Box Storage	8	EA	3.5000	28.00
Hilsoft Billing Rates					
550	Associate Planner	0.600	H	190.0000	114.00
570	Notice Coordinator	0.600	H	135.0000	81.00

Net Amount	20,396.91
Sales Tax	244.49
Total Amount Due	20,641.40





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

Remit to
 Epiq
 Class Action & Claims Solutions
 PO Box 674652
 Dallas, TX 75267-4652
 Tax ID: 93-1210932
 Billing questions: call 503-350-5800
 or ecabilling@epiqglobal.com

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

Bill-To
 Richard Spoonemore
 Sirianni Youtz Spoonemore
 Hamburger
 3101 Western Avenue, Suite 350
 Seattle WA 98121-3871

Information
 Invoice No. 90743079 Invoice Date 04/30/2023
 Purchase Order No.
 Customer No. 3012071
 Currency USD
 Contract No. 40053814
 Contract Description Reichart v KEEFE COMMISSARY NETWORK
 Terms of Payment Net due in 30 days
 Internal Reference No 40053814

Comments
 Billing Period: 04/01/2023 - 04/30/2023

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	4	EA	0.1900	0.76
100	Address Research 1-50K	8	EA	0.1500	1.20
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	96.500	EA	0.1900	18.34
200	Notice Request Transcription	13	EA	0.7500	9.75
Standard Rates					
335	Correspondence Review and Response	2.300	H	75.0000	172.50
350	Project Coordinators	1.100	H	90.0000	99.00
380	Project Managers	3.900	H	150.0000	585.00
490	Box Storage	3	EA	3.5000	10.50





Epiq Systems
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Beaverton, OR 97005

Information			
Invoice No.	90743079	Invoice Date	04/30/2023
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 04/01/2023 - 04/30/2023

Item	Service	Quantity	Unit	Unit Price	Amount
	Net Amount				1,197.05
	Sales Tax				0.08
	Total Amount Due				1,197.13





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

Remit to

Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286

Tax ID: 93-1210932

Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:

Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To

Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information

Invoice No.	90668734	Invoice Date	08/31/2022
Purchase Order No.			
Customer No.	3012071		
Currency	USD		
Contract No.	40053814		
Contract Description	Reichart v KEEFE COMMISSARY NETWORK		
Terms of Payment	Net due in 30 days		
Internal Reference No	40053814		

Comments

Billing Period: 08/01/2022 - 08/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	103	EA	0.1900	19.57
100	Address Research 1-50K	56	EA	0.1500	8.40
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	211.070	EA	0.1900	40.10
200	Notice Request Transcription	33	EA	0.7500	24.75
210	Opt out and Objection Reporting	2	EA	3.7500	7.50
Standard Rates					
330	Claims Analyst	0.300	H	75.0000	22.50
335	Correspondence Review and Response	0.500	H	75.0000	37.50
350	Project Coordinators	6.100	H	90.0000	549.00



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

Information			
Invoice No.	90668734	Invoice Date	08/31/2022
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 08/01/2022 - 08/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
380	Project Managers	5	H	150.0000	750.00
490	Box Storage	4	EA	3.5000	14.00
	Hilsoft Billing Rates				
540	Researcher	0.300	H	200.0000	60.00
Net Amount					1,833.32
Sales Tax					2.02
Total Amount Due					1,835.34





Epiq Systems
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10300 SW Allen Blvd.
Beaverton, OR 97005

Remit to
Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286

Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:
Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90704618 Invoice Date 12/31/2022
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments

Billing Period: 12/01/2022 - 12/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	6	EA	0.1900	1.14
100	Address Research 1-50K	7	EA	0.1500	1.05
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	257.800	EA	0.1900	48.98
200	Notice Request Transcription	28	EA	0.7500	21.00
Standard Rates					
333	Mailing Coordinator	0.100	H	75.0000	7.50
350	Project Coordinators	1.500	H	90.0000	135.00
380	Project Managers	1	H	150.0000	150.00
490	Box Storage	3	EA	3.5000	10.50



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

Information			
Invoice No.	90704618	Invoice Date	12/31/2022
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 12/01/2022 - 12/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
	Net Amount				675.17
	Sales Tax				0.12
	Total Amount Due				675.29





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

Remit to
Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286
Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:
Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90725728 Invoice Date 02/28/2023
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: 02/01/2023 - 02/28/2023

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	3	EA	0.1900	0.57
100	Address Research 1-50K	7	EA	0.1500	1.05
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	150.930	EA	0.1900	28.68
200	Notice Request Transcription	16	EA	0.7500	12.00
Standard Rates					
335	Correspondence Review and Response	1	H	75.0000	75.00
350	Project Coordinators	1.400	H	90.0000	126.00
380	Project Managers	1.100	H	150.0000	165.00
490	Box Storage	3	EA	3.5000	10.50





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

Information			
Invoice No.	90725728	Invoice Date	02/28/2023
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 02/01/2023 - 02/28/2023

Item	Service	Quantity	Unit	Unit Price	Amount
Hilsoft Billing Rates					
540	Researcher	0.200	H	200.0000	40.00
Net Amount					758.80
Sales Tax					0.06
Total Amount Due					758.86





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

Remit to
Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286
Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:
Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90664745 Invoice Date 07/31/2022
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: 07/01/2022 - 07/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	278	EA	0.1900	52.82
90	Enter Change of Address - Postal Forward	4	EA	0.4500	1.80
100	Address Research 1-50K	230	EA	0.1500	34.50
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	426.850	EA	0.1900	81.10
200	Notice Request Transcription	56	EA	0.7500	42.00
Standard Rates					
333	Mailing Coordinator	1	H	75.0000	75.00
335	Correspondence Review and Response	0.400	H	75.0000	30.00
350	Project Coordinators	3.700	H	90.0000	333.00





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

Information			
Invoice No.	90664745	Invoice Date	07/31/2022
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 07/01/2022 - 07/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
380	Project Managers	1.500	H	150.0000	225.00
490	Box Storage	4	EA	3.5000	14.00
Net Amount					1,189.22
Sales Tax					5.44
Total Amount Due					1,194.66





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

Remit to
Epiq
Class Action & Claims Solutions
PO Box 674652
Dallas, TX 75267-4652
Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

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

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90769590 Invoice Date 07/31/2023
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: 07/01/2023 - 07/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	3	EA	0.1900	0.57
100	Address Research 1-50K	2	EA	0.1500	0.30
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	63.320	EA	0.1900	12.03
200	Notice Request Transcription	8	EA	0.7500	6.00
Standard Rates					
350	Project Coordinators	1	H	90.0000	90.00
380	Project Managers	1.900	H	150.0000	285.00
490	Box Storage	3	EA	3.5000	10.50
Hilsoft Billing Rates					





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

Information			
Invoice No.	90769590	Invoice Date	07/31/2023
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 07/01/2023 - 07/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
530	Notice Manager	0.800	H	250.0000	200.00
540	Researcher	1.100	H	200.0000	220.00
Net Amount					1,124.40
Sales Tax					0.06
Total Amount Due					1,124.46





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

Remit to
Epiq
Class Action & Claims Solutions
PO Box 674652
Dallas, TX 75267-4652
Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

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

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90755523 Invoice Date 06/30/2023
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: 06/01/2023 - 06/30/2023

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	5	EA	0.1900	0.95
100	Address Research 1-50K	4	EA	0.1500	0.60
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	120.770	EA	0.1900	22.95
200	Notice Request Transcription	13	EA	0.7500	9.75
Standard Rates					
350	Project Coordinators	5.700	H	90.0000	513.00
380	Project Managers	0.400	H	150.0000	60.00
490	Box Storage	3	EA	3.5000	10.50
Hilsoft Billing Rates					





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

Information			
Invoice No.	90755523	Invoice Date	06/30/2023
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 06/01/2023 - 06/30/2023

Item	Service	Quantity	Unit	Unit Price	Amount
530	Notice Manager	7.200	H	250.0000	1,800.00
540	Researcher	0.100	H	200.0000	20.00
570	Notice Coordinator	1.100	H	135.0000	148.50
Net Amount					2,886.25
Sales Tax					0.10
Total Amount Due					2,886.35





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

Remit to
Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286
Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:
Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90651968 Invoice Date 06/30/2022
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: 06/01/2022 - 06/30/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	1,515	EA	0.1900	287.85
90	Enter Change of Address - Postal Forward	13	EA	0.4500	5.85
100	Address Research 1-50K	1,223	EA	0.1500	183.45
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	434.620	EA	0.1900	82.58
200	Notice Request Transcription	60	EA	0.7500	45.00
210	Opt out and Objection Reporting	1	EA	3.7500	3.75
Postage & Expenses					
230	Postage	5.752	DLR	1.0000	5.75
Standard Rates					





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

Information			
Invoice No.	90651968	Invoice Date	06/30/2022
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 06/01/2022 - 06/30/2022

Item	Service	Quantity	Unit	Unit Price	Amount
310	Contact Center (shared)	18	MIN	1.0500	18.90
330	Claims Analyst	0.300	H	75.0000	22.50
333	Mailing Coordinator	4.100	H	75.0000	307.50
335	Correspondence Review and Response	16.200	H	75.0000	1,215.00
350	Project Coordinators	4.500	H	90.0000	405.00
380	Project Managers	4.400	H	150.0000	660.00
490	Box Storage	4	EA	3.5000	14.00
	Hilsoft Billing Rates				
540	Researcher	0.200	H	200.0000	40.00
Net Amount					3,597.13
Sales Tax					29.65
Total Amount Due					3,626.78





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

Remit to
Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286

Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:
Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90643376 Invoice Date 05/31/2022
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments

Billing Period: 03/01/2022 - 03/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	224,979	EA	0.1900	42,746.01
90	Enter Change of Address - Postal Forward	7,009	EA	0.4500	3,154.05
100	Address Research 1-50K	222,077	EA	0.1500	33,311.55
110	Postcard Notice Remails	117,548	EA	0.1000	11,754.80
120	Full Notice Request Fulfillment	63	EA	1.5000	94.50
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	7,224.570	EA	0.1900	1,372.67
200	Notice Request Transcription	939	EA	0.7500	704.25
210	Opt out and Objection Reporting	45	EA	3.7500	168.75
Postage & Expenses					



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

Information			
Invoice No.	90643376	Invoice Date	05/31/2022
Purchase Order No.			
Customer No.	3012071		

Comments

Billing Period: 03/01/2022 - 03/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
230	Postage	67,248.796	DLR	1.0000	67,248.80
	Standard Rates				
330	Claims Analyst	3.900	H	75.0000	292.50
333	Mailing Coordinator	17.100	H	75.0000	1,282.50
335	Correspondence Review and Response	29.300	H	75.0000	2,197.50
340	Claims Specialist	1.500	H	85.0000	127.50
350	Project Coordinators	15.400	H	90.0000	1,386.00
370	Data Analyst & Reporting	2.500	H	150.0000	375.00
380	Project Managers	21	H	150.0000	3,150.00
405	Software Engineer	0.500	H	190.0000	95.00
490	Box Storage	10	EA	3.5000	35.00
	Hilsoft Billing Rates				
540	Researcher	0.400	H	200.0000	80.00
570	Notice Coordinator	0.800	H	135.0000	108.00
Net Amount					169,984.38
Sales Tax					5,623.31
Total Amount Due					175,607.69



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

Remit to
Epiq
Class Action & Claims Solutions
PO Box 674652
Dallas, TX 75267-4652
Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

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

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90729476 Invoice Date 03/31/2023
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: 03/01/2023 - 03/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	16	EA	0.1900	3.04
90	Enter Change of Address - Postal Forward	5	EA	0.4500	2.25
100	Address Research 1-50K	9	EA	0.1500	1.35
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	149.180	EA	0.1900	28.34
200	Notice Request Transcription	18	EA	0.7500	13.50
Standard Rates					
335	Correspondence Review and Response	1	H	75.0000	75.00
350	Project Coordinators	9.500	H	90.0000	855.00
370	Data Analyst & Reporting	17.600	H	150.0000	2,640.00





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

Information			
Invoice No.	90729476	Invoice Date	03/31/2023
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 03/01/2023 - 03/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
380	Project Managers	10.900	H	150.0000	1,635.00
490	Box Storage	3	EA	3.5000	10.50
Hilsoft Billing Rates					
530	Notice Manager	0.400	H	250.0000	100.00
540	Researcher	0.100	H	200.0000	20.00
570	Notice Coordinator	5	H	135.0000	675.00
Net Amount					6,358.98
Sales Tax					0.31
Total Amount Due					6,359.29





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

Remit to
Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286
Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:
Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90643188 Invoice Date 05/31/2022
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: 05/01/2022 - 05/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	4,230	EA	0.1900	803.70
90	Enter Change of Address - Postal Forward	38	EA	0.4500	17.10
100	Address Research 1-50K	2,997	EA	0.1500	449.55
110	Postcard Notice Remails	2,130	EA	0.1000	213.00
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	663.230	EA	0.1900	126.01
200	Notice Request Transcription	83	EA	0.7500	62.25
210	Opt out and Objection Reporting	16	EA	3.7500	60.00
Postage & Expenses					
230	Postage	855.054	DLR	1.0000	855.05



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

Information			
Invoice No.	90643188	Invoice Date	05/31/2022
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 05/01/2022 - 05/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Standard Rates					
310	Contact Center (shared)	30	MIN	1.0500	31.50
330	Claims Analyst	1.400	H	75.0000	105.00
333	Mailing Coordinator	7.900	H	75.0000	592.50
335	Correspondence Review and Response	17.900	H	75.0000	1,342.50
340	Claims Specialist	0.600	H	85.0000	51.00
350	Project Coordinators	5.900	H	90.0000	531.00
370	Data Analyst & Reporting	1.100	H	150.0000	165.00
380	Project Managers	5.300	H	150.0000	795.00
490	Box Storage	4	EA	3.5000	14.00
Net Amount					6,514.16
Sales Tax					104.72
Total Amount Due					6,618.88





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

Remit to
Epiq
Class Action & Claims Solutions
PO Box 674652
Dallas, TX 75267-4652
Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

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

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90745759 Invoice Date 05/31/2023
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: 05/01/2023 - 05/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	6	EA	0.1900	1.14
100	Address Research 1-50K	5	EA	0.1500	0.75
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	93.150	EA	0.1900	17.70
200	Notice Request Transcription	15	EA	0.7500	11.25
Postage & Expenses					
230	Postage	1.260	DLR	1.0000	1.26
Standard Rates					
333	Mailing Coordinator	0.600	H	75.0000	45.00
335	Correspondence Review and Response	3.300	H	75.0000	247.50





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

Information			
Invoice No.	90745759	Invoice Date	05/31/2023
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 05/01/2023 - 05/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
350	Project Coordinators	1	H	90.0000	90.00
380	Project Managers	0.600	H	150.0000	90.00
490	Box Storage	3	EA	3.5000	10.50
	Hilsoft Billing Rates				
540	Researcher	0.100	H	200.0000	20.00
Net Amount					835.10
Sales Tax					0.12
Total Amount Due					835.22





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

Remit to
 Epiq
 Class Action & Claims Solutions
 Dept 0286
 PO Box 120286
 Dallas, TX 75312-0286

Tax ID: 93-1210932
 Billing questions: call 503-350-5800
 or ecabilling@epiqglobal.com

Payment by Wire:
 Bank: Silicon Valley Bank (Santa Clara, CA)
 ABA Routing: 121140399
 Acct No: 3300483242
 SWIFT: SVBKUS6S

Bill-To
 Richard Spoonemore
 Sirianni Youtz Spoonemore
 Hamburger
 3101 Western Avenue, Suite 350
 Seattle WA 98121-3871

Information
 Invoice No. 90694635 Invoice Date 11/30/2022
 Purchase Order No.
 Customer No. 3012071
 Currency USD
 Contract No. 40053814
 Contract Description Reichart v KEEFE COMMISSARY NETWORK
 Terms of Payment Net due in 30 days
 Internal Reference No 40053814

Comments
 Billing Period: 11/01/2022 - 11/30/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	23	EA	0.1900	4.37
90	Enter Change of Address - Postal Forward	2	EA	0.4500	0.90
100	Address Research 1-50K	16	EA	0.1500	2.40
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	117.980	EA	0.1900	22.42
200	Notice Request Transcription	11	EA	0.7500	8.25
Standard Rates					
335	Correspondence Review and Response	1	H	75.0000	75.00
350	Project Coordinators	1.500	H	90.0000	135.00
380	Project Managers	2.400	H	150.0000	360.00





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

Information			
Invoice No.	90694635	Invoice Date	11/30/2022
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 11/01/2022 - 11/30/2022

Item	Service	Quantity	Unit	Unit Price	Amount
490	Box Storage	3	EA	3.5000	10.50
	Hilsoft Billing Rates				
570	Notice Coordinator	0.200	H	135.0000	27.00
Net Amount					945.84
Sales Tax					0.45
Total Amount Due					946.29





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

Remit to
Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286
Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:
Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90686208 Invoice Date 10/31/2022
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: 10/01/2022 - 10/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	37	EA	0.1900	7.03
90	Enter Change of Address - Postal Forward	1	EA	0.4500	0.45
100	Address Research 1-50K	34	EA	0.1500	5.10
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	148.530	EA	0.1900	28.22
200	Notice Request Transcription	32	EA	0.7500	24.00
Postage & Expenses					
230	Postage	1.800	DLR	1.0000	1.80
Standard Rates					
333	Mailing Coordinator	1.100	H	75.0000	82.50





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

Information			
Invoice No.	90686208	Invoice Date	10/31/2022
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 10/01/2022 - 10/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
335	Correspondence Review and Response	1.300	H	75.0000	97.50
350	Project Coordinators	1.100	H	90.0000	99.00
380	Project Managers	1.200	H	150.0000	180.00
490	Box Storage	3	EA	3.5000	10.50
Net Amount					836.10
Sales Tax					0.72
Total Amount Due					836.82





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

Remit to
Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286
Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:
Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90680238 Invoice Date 09/30/2022
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments
Billing Period: 09/01/2022 - 09/30/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
80	Record Undeliverable Mail	49	EA	0.1900	9.31
100	Address Research 1-50K	71	EA	0.1500	10.65
Website and Reporting					
150	Website Hosting	1	EA	150.0000	150.00
Call Center & Class Member Comm					
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	149.970	EA	0.1900	28.49
200	Notice Request Transcription	25	EA	0.7500	18.75
Standard Rates					
333	Mailing Coordinator	0.100	H	75.0000	7.50
335	Correspondence Review and Response	1.900	H	75.0000	142.50
350	Project Coordinators	3.800	H	90.0000	342.00
380	Project Managers	2	H	150.0000	300.00





Invoice

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

Information			
Invoice No.	90680238	Invoice Date	09/30/2022
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: 09/01/2022 - 09/30/2022

Item	Service	Quantity	Unit	Unit Price	Amount
490	Box Storage	3	EA	3.5000	10.50
Net Amount					1,169.70
Sales Tax					0.96
Total Amount Due					1,170.66





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

Remit to
Epiq
Class Action & Claims Solutions
Dept 0286
PO Box 120286
Dallas, TX 75312-0286

Tax ID: 93-1210932
Billing questions: call 503-350-5800
or ecabilling@epiqglobal.com

Payment by Wire:
Bank: Silicon Valley Bank (Santa Clara, CA)
ABA Routing: 121140399
Acct No: 3300483242
SWIFT: SVBKUS6S

Bill-To
Richard Spoonemore
Sirianni Youtz Spoonemore
Hamburger
3101 Western Avenue, Suite 350
Seattle WA 98121-3871

Information
Invoice No. 90623679 Invoice Date 03/10/2022
Purchase Order No.
Customer No. 3012071
Currency USD
Contract No. 40053814
Contract Description Reichart v KEEFE COMMISSARY NETWORK
Terms of Payment Net due in 30 days
Internal Reference No 40053814

Comments

Billing Period: Start to 02/28/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Data Standardization and Class Notice					
25	Notice Plan	188,562.320	EA	1.0000	188,562.32
30	Import and Standardize Data	1	EA	1,000.0000	1,000.00
40	Forms Setup & Mailing Coordination	6	EA	1,000.0000	6,000.00
60	National Change of Address (\$2 per 1000)	847,192	EA	0.0020	1,694.38
70	Print/Fold Notice & Claim packet	821,139	EA	0.0300	24,634.17
80	Record Undeliverable Mail	7,509	EA	0.1900	1,426.71
90	Enter Change of Address - Postal Forward	139	EA	0.4500	62.55
100	Address Research 1-50K	7,084	EA	0.1500	1,062.60
110	Postcard Notice Remails	2,860	EA	0.1000	286.00
120	Full Notice Request Fulfillment	7	EA	1.5000	10.50
Website and Reporting					
140	Static Website Deployment and Testing	2	EA	1,500.0000	3,000.00
150	Website Hosting	1	EA	150.0000	150.00



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

Information

Invoice No.	90623679	Invoice Date	03/10/2022
Purchase Order No.			
Customer No.	3012071		

Comments

Billing Period: Start to 02/28/2022

Item	Service	Quantity	Unit	Unit Price	Amount
Call Center & Class Member Comm					
170	IVR Configuration and Recording	2	EA	2,000.0000	4,000.00
180	IVR Maintenance Fee	1	EA	150.0000	150.00
190	IVR Minutes of Use	2,745.200	EA	0.1900	521.59
200	Notice Request Transcription	205	EA	0.7500	153.75
210	Opt out and Objection Reporting	2	EA	3.7500	7.50
Postage & Expenses					
230	Postage	243,072.447	DLR	1.0000	243,072.45
245	Translation	1,983.500	DLR	1.0000	1,983.50
Standard Rates					
260	Clerical - Production	6	H	50.0000	300.00
270	Clerical - Document Control	0.900	H	50.0000	45.00
280	Data Entry	0.400	H	50.0000	20.00
330	Claims Analyst	0.400	H	75.0000	30.00
333	Mailing Coordinator	33.500	H	75.0000	2,512.50
345	Account Reconciliation	0.500	H	85.0000	42.50
350	Project Coordinators	66.200	H	90.0000	5,958.00
370	Data Analyst & Reporting	43.200	H	150.0000	6,480.00
380	Project Managers	60.500	H	150.0000	9,075.00
405	Software Engineer	9.200	H	190.0000	1,748.00

DECLARATION OF RICHARD E. SPOONEMORE
 EXHIBIT 3 - Page 63 of 135



CONFIDENTIAL



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

Information			
Invoice No.	90623679	Invoice Date	03/10/2022
Purchase Order No.			
Customer No.	3012071		

Comments
Billing Period: Start to 02/28/2022

Item	Service	Quantity	Unit	Unit Price	Amount
490	Box Storage	2	EA	3.5000	7.00
	Hilsoft Billing Rates				
540	Researcher	5.800	H	200.0000	1,160.00
550	Associate Planner	11.100	H	190.0000	2,109.00
570	Notice Coordinator	10.800	H	135.0000	1,458.00
Net Amount					508,723.02
Sales Tax					3,507.33
Less Deposit Applied					-506,957.32
Total Amount Due					5,273.03





Invoice Number	Invoice Date	Account Number
7-600-91936	Dec 17, 2021	[REDACTED]

Billing Address:

SIRIANNI,YOUTZ,MIER,SPOONEMORE
THERESA REDFERN
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3017

Shipping Address:

SIRIANNI,YOUTZ,MIER,SPOONEMORE
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3017

Invoice Questions?

Contact FedEx Revenue Services

Phone: 800.622.1147
M-F 7 AM to 8 PM CST
Sa 7 AM to 6 PM CST
Internet: fedex.com

Invoice Summary

FedEx Express Services

Total Charges	USD	\$33.31
TOTAL THIS INVOICE	USD	\$33.31

You saved \$4.45 in discounts this period!

Shipments included in this invoice received an earned discount. If you would like to know how it was calculated, please go to the following URL:
<https://www.fedex.com/EarnedDiscounts/>.

Payments not received by Jan 01, 2022 are subject to a late fee.

Other discounts may apply.

To pay your FedEx invoice, please go to www.fedex.com/payment. Thank you for using FedEx.



Detailed descriptions of surcharges can be located at fedex.com

To ensure proper credit, please return this portion with your payment to FedEx. Please do not staple or fold. Please make check payable to FedEx.

Invoice Number	Invoice Amount	Account Number
7-600-91936	USD \$33.31	[REDACTED]

Remittance Advice

Your payment is due by Jan 01, 2022

Payments not received by this date are subject to a late fee.

76009193640000033316101126609300000000000000000333160



SIRIANNI,YOUTZ,MIER,SPOONEMORE
THERESA REDFERN
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3017

FedEx
P.O. Box 94515
PALATINE IL 60094-4515



Invoice Number	Invoice Date	Account Number	Page
7-600-91936	Dec 17, 2021		2 of 2

FedEx Express Shipment Summary By Payor Type

FedEx Express Shipments (Original)

Payor Type	Shipments	Rated Weight lbs	Transportation Charges	Special Handling Charges	Ret Chg/Tax Credits/Other	Discounts	Total Charges
Shipper	1	3.0	34.19	3.57		-4.45	33.31
Total FedEx Express	1	3.0	\$34.19	\$3.57		-\$4.45	\$33.31

TOTAL THIS INVOICE **USD** **\$33.31**

FedEx Express Shipment Detail By Payor Type (Original)

Ship Date: Dec 09, 2021		Cust. Ref.: 7915-001		Ref.#2:		
Payor: Shipper		Ref.#3:				
<small>Fuel Surcharge FedEx has applied a fuel surcharge of 12.00% to this shipment. Distance Based Pricing, Zone 5</small>						
Automation	INET	Sender		Recipient		
Tracking ID	775450420750	Chris R. Youtz		Clerk, 9th Cir. Court of Appea		
Service Type	FedEx 2Day AM	Sirianni Youtz Spoonemore Hamb		US Court of Appeals, 9th Circu		
Package Type	FedEx Box	3101 Western Avenue		95 7TH ST		
Zone	05	SEATTLE WA 98121 US		SAN FRANCISCO CA 94103 US		
Packages	1					
Rated Weight	3.0 lbs, 1.4 kgs	Transportation Charge			34.19	
Delivered	Dec 13, 2021 08:23	Grace Discount			-2.74	
Svc Area	A1	Automation Bonus Discount			-1.71	
Signed by	A.AL	Fuel Surcharge			3.57	
FedEx Use	000000000/10/	Total Charge		USD	\$33.31	
				Shipper Subtotal	USD	\$33.31
				Total FedEx Express	USD	\$33.31

FedEx® Billing Online

FedEx Billing Online allows you to efficiently manage and pay your FedEx invoices online. It's free, easy and secure. FedEx Billing Online helps you streamline your billing process. With all your FedEx shipping information available in one secure online location, you never have to worry about misplacing a paper invoice or sifting through reams of paper to find information for past shipments. Go to fedex.com to sign up today!

Payment Receipt

Date - 1/5/2023

#CshSale-180838

BILL TO

RICHARD E. SPOONEMORE
 SIRIANNI YOUTZ SPOONEMORE
 HAMBURGER PLLC
 3101 WESTERN AVE STE 350
 SEATTLE WA 98121
 United States

SHIP TO

Theresa Redfern
 SIRIANNI YOUTZ SPOONEMORE
 HAMBURGER PLLC
 13040 Occidental Ave. S.
 Burien WA 98168
 United States

ORDER DETAILS

Status
 Not Deposited
Pending Approval Reason
Terms
 Cash
Payment Method
 VISA
PO#
Shipping Method
 UPS Ground
Ship Date
 12/28/2022
Tracking #
 1Z688F950398506283
 1Z688F950398506292

Item	Description	Quantity	Rate	Amount
40-535	SELF SEAL #9 DBL WIND ENV	500	\$0.60	\$300.00

[Print Instructions](#)

Prior Job#:
 229133

Forms for PC 136
 P O BOX 681
 800-711-9726
 www.formsforpc136.com
 TARRYTOWN NY 10591
 United States

Item	Description	Quantity	Rate	Amount
990LT1	LASER M/P MIDDLE CHECK	500	\$0.57	\$285.00

Print Instructions

Repeat, New, or Repeat With Changes?: New	Colors: Tan	State: WA	Routing Number: 125100089
Prior Job#: 229133	Company Name Line 1: Reichert v. Rapid Financial and Keefe Commissary	Zip: 98121	Check Account Number: 1001453214
Reverse Numbering?: No	Company Name Line 2: KEEFE SETTLEMENT FUND FOR WASHINGTON FACILITIES	Bank Name: WASHINGTON TRUST BANK	Imprint Below Signature Line: VOID AFTER 60 DAYS
Starting Number: 000001	Address Line 1: 3101 WESTERN AVE STE 350	Bank Address: PO Box 2127	
Signature Lines: 1	City: SEATTLE	Bank City, State: Spokane, WA 99210	

Subtotal	\$585.00
Discount Item	
Tax Total (10.1%)	\$73.96
Estimated Shipping and Handling	\$147.29
Order Total	\$806.25
Less Prepayment	-\$806.25
Total Due	\$0.00

Thank you for your Advanced Payment by VISA

Disclaimer:
 Thank you for your order. During this difficult time, we continue to fulfill your order in 24 hours for blank product and 3-5 days for personalized product. UPS is making all efforts to ship and meet their service schedule but they have removed their service guarantee. If you are working from home, please verify the delivery address. Thank you and we wish you and your family the best.

1. Please contact us for authorization on any returns.
2. Return of tax forms and tax products must be received by January 6 and may be subject to a 25% restocking fee.
3. Additional shipping and handling charges may incur if you are located outside the 48 contiguous United States of America.

From: customerservice@govpaynet.com
Sent: Thursday, August 13, 2020 10:41 AM
To: Theresa Redfern
Subject: [External] ONSITE ADMIN SERVICE FEES Payment Confirmation



Government Payment Service
GovPayNet
7820 Innovation Boulevard Suite 250
Indianapolis, IN 46278

24 Hour Customer Service #: 888-604-7888

ONSITE ADMIN SERVICE FEES Payment Confirmation

PLC: FREMONT COUNTY SHERIFFS OFFICE **DATE:** 08/13/20
a002z1 100 JUSTICE CENTER ROAD
CANON CITY, CO 81212
FOR: ONSITE ADMIN SERVICE FEES

TRANSACTION INFORMATION

Name: CHRIS R YOUTZ
Fee Type #1: RECORDS/NULL/7.50 **TRANSACTION REFERENCE #:** 29238237
Fee Type #2: NULL/NULL/
Fee Type #3: NULL/NULL/ **TRANSACTION DATE/TIME:** 08/13/2020 13:40:34 EDT
Tech Initials: AC

BILLING INFORMATION

NAME: CHIRS R YOUTZ
ADDRESS: 3101 WESTERN AVENUE, SUITE 350
CITY, STATE ZIP: SEATTLE, WA 98121
PHONE #: 206-223-0303
CARD #: xxxx-xxxx-xxxx-7037

PAYMENT INFORMATION

APPROVAL #: 004176
PAYMENT AMOUNT: \$7.50
SERVICE FEE: \$1.75
TOTAL AMOUNT: \$9.25

The service fee is not refundable.

ATTENTION CARDHOLDER:

If you have questions about the processing of your payment, please call GovPayNet at 888-604-7888.

Thank you for using GovPayNet

© 2007 Government Payment Service, Inc.

Form #: EUP



June 2, 2020

Chris R Youtz
Sirianni Youtz Spoonemore Hamburger PLLC
3101 Western Avenue, Suite 350
Seattle, WA 98121

RE: Public Records Request

Total amount due \$10.00

Please remit payment to: Gallia County Sheriff's Office
Attn: Heather Casto
18 Locust Street
Gallipolis, OH 45631

RECEIVED

JUL 22 2020

GEARY COUNTY SHERIFF'S DEPARTMENT

Sirianni Youtz
Spoonemore Hamburger PLLC

Daniel E. Jackson Jr.
Sheriff



826 N. Franklin St.
Junction City, KS 66441
Office: (785) 238-2261
Fax: (785) 762-5085

July 15, 2020

Matthew Terry - Records Manager
Sirianni Youtz Spoonemore Hamburger PLLC
3101 Western Ave., Suite 350
Seattle, WA 98121

Dear Mr. Terry,

This is the response to your email dated Friday, 07/10/2020, requesting documents related to the procedures for returning money to people released from the Geary County Corrections.

I am asking for you to pay the estimated actual cost to provide the requested records. These costs include staff time to retrieve, review and redact information from the record, if it is needed. The law allows me to estimate those costs and require it to be paid before records are provided. You will need to pay the estimated actual costs in full to receive the documents you request.

Additionally, I am requesting that you produce fees for your July 10th request by Monday, July 27, 2020, or all outstanding requests will be considered closed.

35 pages x \$.25	=	\$8.75
1 hour x \$14.82	=	\$14.82
Total Estimated Cost		\$23.57

Sincerely,

Major Mark Anderson

From: GoDaddy Renewals <renewals@godaddy.com>
Sent: Sunday, May 21, 2023 6:36 AM
To: Chris Youtz
Subject: [External] Chris Youtz: Your GoDaddy Renewal Notice

You qualify for 20% off any new order of \$40.00 or more.*
Use promo code tfu1964d5 at checkout.



Need help? [Contact us.](#)

Chris Youtz — Customer Number: 495251498

Your domains are about to auto-renew.

Smart choice. As long as your payment info is still up to date, you can keep doing your thing. Not sure it's right? No problem. [Just sign in to your account and find out.](#)

Auto-renews on 5/26/2023 | Term: 1 Year

keefesettlement.com

+ .COM Domain Renewal

\$19.99**

This message confirms that during the checkout process you agreed to the Terms in GoDaddy's [Universal Terms of Service Agreement](#), [Privacy Policy](#), and any other applicable agreements. Your use of these products is governed by the terms of these agreements and policies. If you wish to cancel, please learn more about our [Refund Policy](#). This message also confirms that during the checkout process you agreed to enroll your products in our automatic renewal service. This keeps your products up and running, automatically charging then-current renewal fees to your payment method on file, with no further action on your part. If you do not wish to continue

using our automatic renewal service, you can cancel automatic renewal by visiting the [Renewals and Billing page](#) in your GoDaddy account.

Some domain renewals may be renewed prior to the expiration date to avoid domain redemption fees. [See additional terms for details.](#)

[*See offer terms, conditions and legal policies.](#)

**Plus applicable taxes and fees, including ICANN fee. Domains automatically renew at registration length of last renewal term.

Prices are current as of 5/21/2023 and may be changed without notice.

Please do not reply to this email. Emails sent to this address will not be answered.

Copyright © 1999-2023 GoDaddy Operating Company, LLC. 2155 E. GoDaddy Way, Tempe, AZ 85284 USA. All rights reserved.

5885922403

SYSH PLLC
BL ACCT

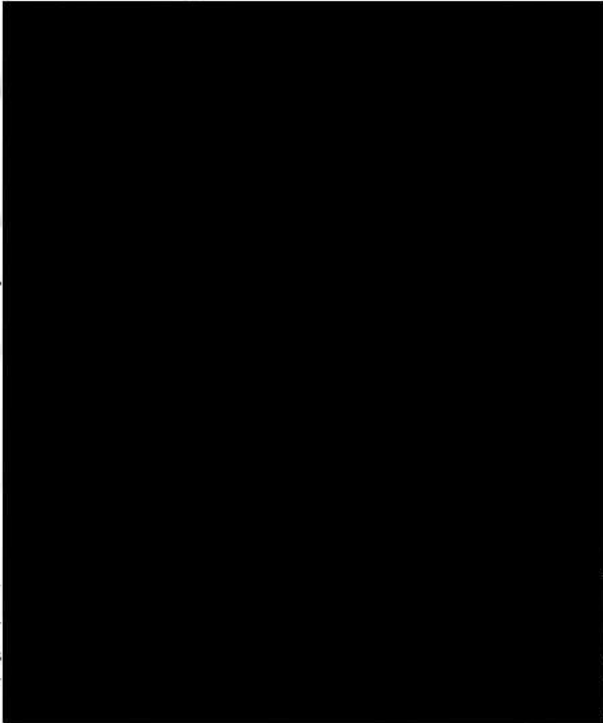


SCORECARD

Bonus Points
Available
5,000

Account Summary

Billing Cycle 08/31/22
Days In Billing Cycle 31



Account Inquiries

Customer Service: (800) 423-7503
Report Lost or Stolen Card: (727) 570-4881

Visit us on the web at:
www.MyCardStatement.com

Please send Billing Inquiries and
Correspondence to:
CUSTOMER SERVICE PO BOX 30495 TAMPA,
FL 33630

Payment Summary



PAYMENT DUE DATE 09/25/2022

NOTE: Grace period to avoid a finance charge on purchases, pay
entire new balance by payment due date. Finance charge accrues on
cash advances until paid and will be billed on your next statement.



Important Information About Your Account

MANAGE YOUR CARD ACCOUNT ONLINE. IT'S FREE! IT'S EASY! SIMPLY GO TO WWW.MYCARDSTATEMENT.COM AND
ENROLL IN OUR ONLINE SERVICE. YOU CAN REVIEW ACCOUNT INFORMATION, TRACK SPENDING, SET ALERT SERVICE,
NOTIFICATIONS, DOWNLOAD FILES, AND MUCH MORE. MANAGING YOUR ACCOUNT IS FAST, SECURE, AND EASY WITH
MYCARDSTATEMENT.COM. ENROLL TODAY!

PLEASE DETACH COUPON AND RETURN PAYMENT USING THE ENCLOSED ENVELOPE - ALLOW UP TO 7 DAYS FOR RECEIPT

HERITAGE BANK
3615 PACIFIC AVE
TACOMA WA 98418 - 7921

Check box to indicate
name/address change on
back of this coupon

AMOUNT OF PAYMENT ENCLOSED

Closing Date	New Balance	Total Minimum Payment Due	Payment Due Date
08/31/22			09/25/2022

\$

SYSH PLLC
BL ACCT
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871



MAKE CHECK PAYABLE TO:

VISA
PO BOX 4512
CAROL STREAM IL 60197-4512

SYSR PLE
BL ACCT



HERITAGE BANK

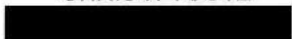


Page 2 of 6



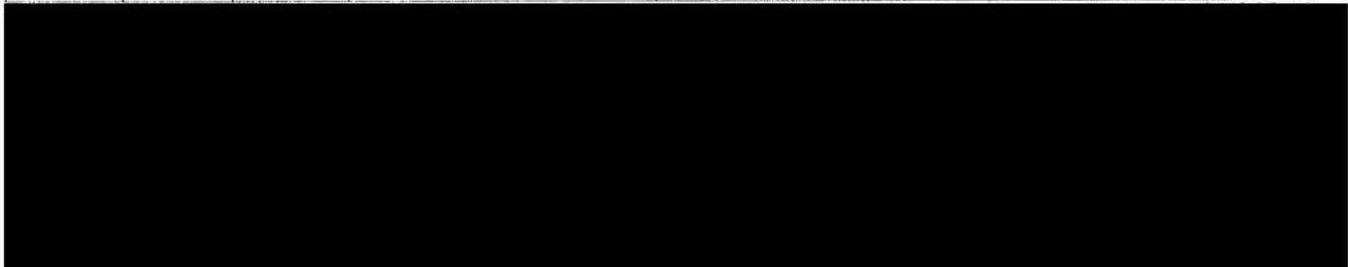
Cardholder Account Summary

CHRIS R YOUTZ



Cardholder Account Detail

Trans Date	Post Date	MCC Code	Reference Number	Description	Amount
------------	-----------	----------	------------------	-------------	--------



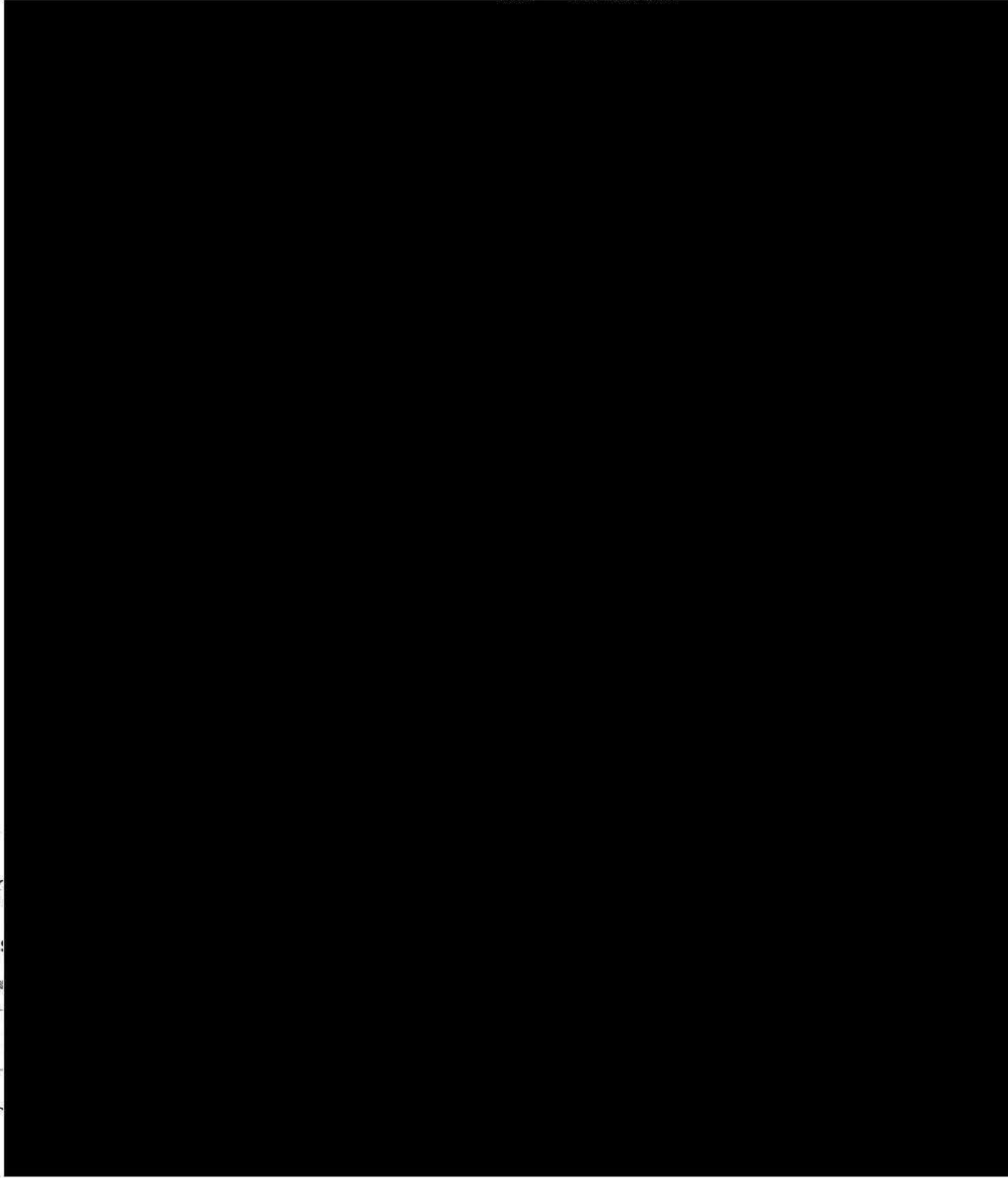
08/10/22	08/11/22	5942	24692162222100768259195	AMT: 39.69 TC 05/00 AMZN Mktp US*248YD8WH3 Amzn.com/bill WA	\$7.61
08/11/22	08/11/22	5045	24692162223100914331483	AMT: 7.61 TC 05/00 POSTAGE SAVER SOFTWARE 512-861-5463 TX	\$79.50
08/12/22	08/14/22	5943	24011342224000042045172	AMT: 79.50 TC 05/00 SP CUTCARDSTOCK WWW.CUTCARDST IN AMT: 413.80 TC 05/00	\$413.80



08/14/22	08/16/22	8999	24223692227030035144160	PB DATA SERVICES, LLC 630-740-9590 DE AMT: 50.00 TC 05/00	\$50.00
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DECLARATION OF RICHARD E. SPOONEMORE
EXHIBIT 3 - Page 77 of 135

Cardholder Account Detail Continued					
Trans Date	Post Date	MCC Code	Reference Number	Description	Amount
08/14/22	08/17/22	8999	24223692228030035418852	PB DATA SERVICES, LLC 630-740-9590 DE AMT: 56.33 TC 05/00	\$56.33
08/14/22	08/17/22	8999	24223692228030035418845	PB DATA SERVICES, LLC 630-740-9590 DE AMT: 355.00 TC 05/00	\$355.00
08/20/22	08/21/22	5942	24692162232100693113770	Amazon.com*K450820M3 Amzn.com/bill WA AMT: 5.27 TC 05/00	\$5.27



DATE : Apr/21/2020
CHE # : 35493
AMOUNT : \$13.25
ACCOUNT: GENERAL - 98
PAID TO: HASKELL COUNTY SHERIFF'S OFFICE
PO BOX 853
SUBLETTE
KS
67877

Records Request Fee

CLIENT: 7915 - Reichert, Jeffrey
MATTER: 7915-001

35493

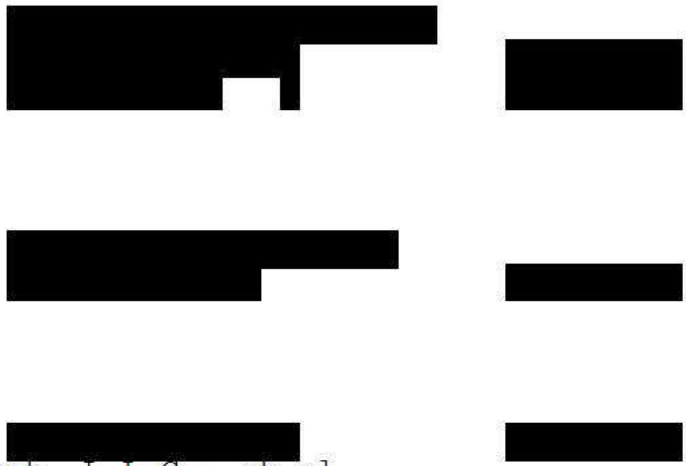
Thirteen ***** 25/100

Apr/21/2020 \$13.25

HASKELL COUNTY SHERIFF'S OFFICE
PO BOX 853
SUBLETTE, KS 67877

Records Request Fee

DATE : Apr/21/2020
CHE # : 35493
AMOUNT : \$13.25
ACCOUNT: GENERAL - 98
PAID TO: HASKELL COUNTY SHERIFF'S OFFICE
Records Request Fee
7915 - Reichert, Jeffrey
MATTER :7915-001
LAWYER :Chris R. Youtz



Jeffrey Reichert v. Keefe Commissary Network, L.L.C., et al.

Law Offices

H I L L I S C L A R K M A R T I N & P E T E R S O N

A Professional Services Corporation
 999 Third Avenue, Suite 4600
 Seattle, WA 98104
 (206) 623-1745 Facsimile (206) 623-7789

May 17, 2023

Statement #: 290460

Sirianni Youtz Spoonemore Hamburger
 Richard E. Spoonemore
 701 Fifth Avenue, Suite 2560
 Seattle, WA 98104

HCMP Mediation/Arbitration

STATEMENT SUMMARY

Matter	Current Statement Total	Previous Balance Due	Payments and Trust Applications	Total Amount Due
Reichert, Moyer / Cache Valley Bank	0.00	487.50	0.00	487.50

The statement has been split in the following section between the billing parties according to agreed percentages. Please pay your portion of the total amount due as follows:

Billing Party	Billing %	Total Amount Due
Sirianni Youtz Spoonemore Hamburger	50.00	487.50
Stinson LLP	50.00	0.00

Payment of current amounts is due 30 days from the date shown above. Interest accrues on past due amounts at the rate of 1% per month. Please refer to statement number when making payment.

F.I.D. #: 91-0870796
 THIS STATEMENT MAY NOT INCLUDE EXPENSE ITEMS
 FOR WHICH WE HAVE NOT YET BEEN BILLED.

DECLARATION OF RICHARD E. SPOONEMORE
 EXHIBIT 3 - Page 80 of 135

Statement # 290460

Page: 1

Law Offices

H I L L I S C L A R K M A R T I N & P E T E R S O N

A Professional Service Corporation
999 Third Avenue, Suite 4600
Seattle, WA 98104
(206) 623-1745 Facsimile (206) 623-7789

May 17, 2023

Sirianni Youtz Spoonemore Hamburger
Richard E. Spoonemore
701 Fifth Avenue, Suite 2560
Seattle, WA 98104

Matter ID 15999.927
Statement Number 290460
Services Through 4/30/2023

HCMP Mediation/Arbitration

Reichert, Moyer / Cache Valley Bank

MATTERSUMMARY

Current Fees	0.00
Current Expenses	0.00
Current Interest	0.00
Current Statement Total	0.00
Previous Balance Due	487.50
Payments and Trust Applications	0.00
TOTALAMOUNTDUE	\$ 487.50

Law Offices

H I L L I S C L A R K M A R T I N & P E T E R S O N

A Professional Services Corporation
 999 Third Avenue, Suite 4600
 Seattle, WA 98104
 (206) 623-1745 Facsimile (206) 623-7789

February 6, 2023

Statement #: 286357

Sirianni Youtz Spoonemore Hamburger
 Richard E. Spoonemore
 701 Fifth Avenue, Suite 2560
 Seattle, WA 98104

HCMP Mediation/Arbitration

STATEMENT SUMMARY

Matter	Current Statement Total	Previous Balance Due	Payments and Trust Applications	Total Amount Due
Reichert, Moyer / Cache Valley Bank	8,125.00	0.00	0.00	8,125.00

The statement has been split in the following section between the billing parties according to agreed percentages. Please pay your portion of the total amount due as follows:

Billing Party	Billing %	Total Amount Due
Sirianni Youtz Spoonemore Hamburger	50.00	4,062.50
Stinson LLP	50.00	4,062.50

Payment of current amounts is due 30 days from the date shown above. Interest accrues on past due amounts at the rate of 1% per month. Please refer to statement number when making payment.

F.I.D. #: 91-0870796
 THIS STATEMENT MAY NOT INCLUDE EXPENSE ITEMS
 FOR WHICH WE HAVE NOT YET BEEN BILLED.

DECLARATION OF RICHARD E. SPOONEMORE
 EXHIBIT 3 - Page 82 of 135

Statement # 286357

Page: 1

Law Offices

H I L L I S C L A R K M A R T I N & P E T E R S O N

A Professional Service Corporation
 999 Third Avenue, Suite 4600
 Seattle, WA 98104
 (206) 623-1745 Facsimile (206) 623-7789

February 6, 2023

Sirianni Youtz Spoonemore Hamburger
 Richard E. Spoonemore
 701 Fifth Avenue, Suite 2560
 Seattle, WA 98104

Matter ID 15999.927
 Statement Number 286357
 Services Through 1/31/2023

HCMP Mediation/Arbitration

Reichert, Moyer / Cache Valley Bank

PROFESSIONAL SERVICES

1/5/2023	LDP	0.50	Telephone conference with counsel	
1/10/2023	LDP	2.50	Review mediation submittals	
1/11/2023	LDP	7.50	Mediation	
1/17/2023	LDP	2.00	Telephone conferences and emails with counsel re settlement	
	Louis D. Peterson	12.50	hours at 650.00 \$/hour	8,125.00
			Total Current Fees	8,125.00

MATTER SUMMARY

Current Fees	8,125.00
Current Expenses	0.00
Current Interest	0.00
Current Statement Total	8,125.00
Previous Balance Due	0.00
Payments and Trust Applications	0.00
TOTAL AMOUNT DUE	\$ 8,125.00

KROLL
SETTLEMENT
ADMINISTRATION

Rick Spoonemore
SirianniYoutzSpoonemoreHamburg
3101 Western Ave
#350
Seattle, WA 98121
Rick@sylaw.com

Total Due: USD 280,000.00
Invoice No: PA00715830
Sequence No: 4246
Invoice Date: September 27, 2023
Due Date: October 27, 2023
Project No: 177787
Customer No: 6021996
Contact: Maggie McGill

PRIVILEGED & CONFIDENTIAL

Through September 30, 2023

RE: Reichert v. Rapid

Retainer to be applied against Professional Services to be rendered USD 280,000.00

Total Due: USD 280,000.00

Please note this invoice covers current charges only and may not include previous unpaid invoice balances.

Remittance Instructions:

Account Name: Kroll Settlement Administration LLC
Bank Name: Bank of America
Account No: 483065996116
ACH ABA#: 021000322
Wire ABA#: 026009593
Swift Code: BOFAUS3N

Billing Questions:

T: +1 952-563-3077
E: EliteAR@kroll.com

Tax ID:

82-3588071

Important Note: Please include our invoice number and name of your organization with all payments and send remittance advice to AR@kroll.com.

From: EliteAR <EliteAR@kroll.com>
Sent: Wednesday, November 1, 2023 3:16 PM
To: Theresa Redfern; EliteAR
Cc: Rick Spoonemore; Terri Segadelli
Subject: RE: [External] Question regarding payments - Customer No. 6021996

Hello, payment dates and amounts are noted below:

P	WIRE	10/06/23	280,000.00-
P	WIRE	09/27/23	140,000.00-
P	WIRE	09/27/23	140,000.00-

Rachael Nordberg

Vice President, Accounts Receivable, Finance

T +1 952 852 7115 | M +1 320 420 1084

From: Theresa Redfern <theresa@sylaw.com>
Sent: Wednesday, November 1, 2023 5:08 PM
To: EliteAR <EliteAR@kroll.com>
Cc: Rick Spoonemore <rick@sylaw.com>; Terri Segadelli <Terri@sylaw.com>
Subject: [EXTERNAL] Question regarding payments - Customer No. 6021996
Importance: High

Dear Kroll AR Team,

We are preparing pleading papers for filing tomorrow and need to know the dates of two of the three payments you should have received on your Invoice No. PA00715830 to us (copy attached). We wired \$140,000 on 9/27/2023. Another \$140,000 was wired to you directly by Chris Youtz, and the balance of \$280,000 was wired by Rapid Financial Solutions. We need to know the dates that you received the wires from Chris and from Rapid.

If you have any questions, please let me know.

Best regards,

Theresa A. Redfern

Legal Secretary/Office Administrator

SIRIANNI YOUTZ SPOONEMORE HAMBURGER PLLC

3101 Western Avenue, Suite 350, Seattle, WA 98121

Main: (206) 223-0303 | Fax: (206) 223-0246

Direct: (206) 838-3200 | Cell: (206) 251-1645

E-mail: theresa@sylaw.com | Website: www.sylaw.com

This email is confidential and subject to important disclaimers and conditions, including those regarding confidentiality, legal privilege and certain legal entity disclaimers, available at <https://www.kroll.com/disclosure>. Our Privacy Policy is available at <https://www.kroll.com/en/privacy-policy>.

From: Theresa Redfern
Sent: Tuesday, May 19, 2020 11:44 AM
To: Jessica Walker
Cc: Chris Youtz
Subject: RE: Records request for the Lancaster County Detention Center

Thank you so much, Ms. Walker. Electronic copies are preferred, so we will send a check for \$11.03.

Best regards,

Theresa A. Redfern

Legal Secretary/Office Administrator

SIRIANNI YOUTZ SPOONEMORE HAMBURGER PLLC

3101 Western Avenue, Suite 350, Seattle, WA 98121

Main: (206) 223-0303 | Fax: (206) 223-0246

Direct: (206) 838-3200 | Cell: (206) 251-1645

E-mail: theresa@sylaw.com | Website: www.sylaw.com

I am presently working remotely but regularly checking email and voice mail.

From: Jessica Walker <jwalker@lacoso.net>
Sent: Tuesday, May 19, 2020 11:39 AM
To: Theresa Redfern <theresa@sylaw.com>; Chris Youtz <chris@sylaw.com>
Subject: [External] Records request for the Lancaster County Detention Center

Citizens are urged to call or e-mail before driving to a County Office.

Many buildings or functions are currently closed to public access, operating on an appointment-only schedule and/or with a reduced staff to minimize contact between employees, the public, and each other.

Mr. Youtz,

I have attached the invoice for the records request you sent via email on 5/12/2020. You can make checks payable to the Lancaster County Sheriff's Office and mail it to the PO Box below. Once payment is received, I can either mail the records, or scan and email them to you, your choice. If you chose to have the files sent electronically, the invoice amount due will be adjusted to \$11.03 seeing as we do not charge for electronic copies being sent out. If you have any issues or questions, please feel free to contact me.

Lancaster County Sheriff's Office

Attn: FOIA

P.O. Box 908

Lancaster, SC 29721

Thanks,

Jessica Walker

Professional Standards Division

Lancaster County Sheriff's Office

(P) 803-313-2111

(F) 877-636-7980

jwalker@lacosso.net



CONFIDENTIALITY NOTICE: This email message, including any attachments, is for the sole use of the intended recipient(s) and may contain private, restricted and/or legally privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of Lancaster County. Finally, the recipient should check this email and any attachments for the presence of viruses. Lancaster County accepts no liability for any damage caused by any virus transmitted by this email.

SIRIANNI YOUTZ
SPOONEMORE HAMBURGER PLLC

May 26, 2020

A. Cruickshanks, IV
LAURENS COUNTY ATTORNEY
P.O. Box 786
Clinton, SC 29325

RE: *Records Request*

Dear M. Cruickshanks:

Please find enclosed a check in the amount of \$16.30 for materials in response to our records request (copy also enclosed, along with your invoice).

Thank you for your assistance.

Very truly yours,

SIRIANNI YOUTZ
SPOONEMORE HAMBURGER PLLC

/s/ Chris R. Youtz

Chris R. Youtz

CRY:tr
Enclosures



**Office of the Sheriff
LEXINGTON COUNTY
Bryan "Jay" Koon**

RECEIVED

JUN 10 2020

June 1, 2020

Sirianni Youtz
Spoonemore Hamburger PLLC

Chris R. Yountz
Sirianni Youtz Spoonemore Hamburger PLLC
3101 Western Avenue, Suite 350
Seattle, WA 98121

Re: FOIA Request
Lexington County Detention Center Inmate Funds

Dear Mr. Yountz:

The policy of the Lexington County Sheriff's Department relevant to inmate funds is available according to Katherine Luvisi, Accreditation Manager. The information can be released to you upon payment to the Lexington County Sheriff's Department in the amount of Six Dollars and 50/100 (\$6.50) to cover the cost of production. Our mailing address is P.O. Box 639, Lexington, SC 29071. Please send payment to the attention of Becky Hilton.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Joel M. Deason".

Joel M. Deason
General Counsel



DATE : Apr/21/2020
CHE # : 35494
AMOUNT : \$7.38
ACCOUNT: GENERAL - 98
PAID TO: MORGAN COUNTY SHERIFF'S OFFICE
211 E NEWTON ST
VERSAILLES
MO
65084

Records Request Fee

CLIENT: 7915 - Reichert, Jeffrey
MATTER: 7915-001

35494

Seven ***** 38/100

Apr/21/2020 \$7.38

MORGAN COUNTY SHERIFF'S OFFICE
211 E NEWTON ST
VERSAILLES, MO 65084

Records Request Fee

DATE : Apr/21/2020
CHE # : 35494
AMOUNT : \$7.38
ACCOUNT: GENERAL - 98
PAID TO: MORGAN COUNTY SHERIFF'S OFFICE
Records Request Fee
7915 - Reichert, Jeffrey
MATTER :7915-001
LAWYER :Chris R. Youtz



Jeffrey Reichert v. Keefe Commissary Network, L.L.C., et al.

DATE : Apr/25/2020
CHE # : 35500
AMOUNT : \$20.20
ACCOUNT: GENERAL - 98
PAID TO: NEWTON COUNTY SHERIFF'S OFFICE
208 W COLER ST
NEOSHO
MO
64850

Records Request Fee

CLIENT: 7915 - Reichert, Jeffrey
MATTER: 7915-001

35500

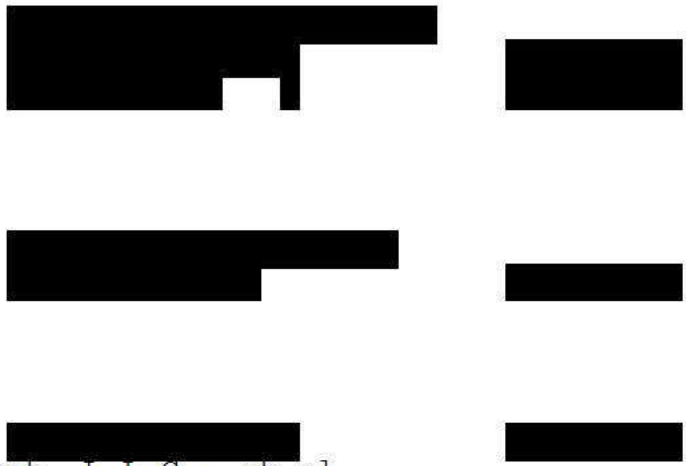
Twenty ***** 20/100

Apr/25/2020 \$20.20

NEWTON COUNTY SHERIFF'S OFFICE
208 W COLER ST
NEOSHO, MO 64850

Records Request Fee

DATE : Apr/25/2020
CHE # : 35500
AMOUNT : \$20.20
ACCOUNT: GENERAL - 98
PAID TO: NEWTON COUNTY SHERIFF'S OFFICE
Records Request Fee
7915 - Reichert, Jeffrey
MATTER :7915-001
LAWYER :Chris R. Youtz



Jeffrey Reichert v. Keefe Commissary Network, L.L.C., et al.

United States District Court
Ninth Circuit

Date: 06/04/2019

Invoice Number: 201900124

To:

Richard Spoonemore
Assistant's Name: Theresa
Assistant's Phone: (206) 838-3200

Make Checks Payable To:

Ms. Angela Gayle Nicolavo, CRR, RMR, CRC
Official US Court Reporter
United States District Court, Western District of Washington
at Tacoma
1717 Pacific Avenue
Tacoma, WA, 98402
Phone: (253) 882-3832
Email: angela_nicolavo@wawd.uscourts.gov

Case Details:

Case Number: 17-05848
Case Title: Reichert vs. Keefe
Case Description:
Criminal or Civil: Civil

Proceeding Date: May 28, 2019
Courthouse: Tacoma
Judge Hearing Case: Judge Leighton

Transcripts:

Date Ordered: May 31, 2019
Date Delivered: Jun 04, 2019
Transcripts Requested By: Mr. Spoonemore

Charges:

Page Type	Page Count	Rate	Sub-Total
Expedited 1st Copy	54	\$0.90	\$48.60

Total: \$48.60

Amount Due: \$48.60

/s/ Angela Nicolavo

We're Processing Your Order, Thank You!

(We will send you an email once your processing is completed.)



PB Data Services, LLC
 427 N Tatnall St #53803
 Wilmington, DE 19801-2230
 P: 888-LIST-101
 support@updateyourlist.com

Confirmation#	MyCredits
Job Submitted:	9/18/2023 4:43:00 PM
Due By:	9/19/2023 4:43:00 PM
Filename	FinalNewDataAddressesInput.xlsx
File#	695816
Total Records	85396
Format	xlsx
Work Order#	619334
PO#	

Sirianni Youtz Spoonemore Hamburger
 Chris Youtz
 3101 Western Ave, Suite 350
 Seattle, WA 98121
 P: 2062230303
 chris@syllaw.com

FinalNewDataAddressesInput.xlsx File# 695816

Product	Description	Unit Price
CASS	CASS - Coding Accuracy Support System	1.30 per 1K
PCOA	PCOA - Private Change of Address	1.60 per 1K
	Minimum Fee Adjustment	0.00

Processing Fee:	\$0.00
ESTIMATED MATCH RATE	\$247.64
\$247.64 (per 1K Input Records)	

Note: If paying by credit card, your card will be Pre-Authorized for the Minimum Processing Fee (or Estimated Match Rate). Depending upon your processing results, this amount may be lower or higher than your final bill. If your final invoice has a balance due, you will be redirected to the payment form to pay the difference before downloading your results.

You have elected to use your available credits which is currently \$248.00

Jail Records

Pima County Sheriff's Department
Mark D. Napier, Sheriff

Fee Worksheet
Records Maintenance Unit

Date: 06/22/20

Requestor: CHRIS R. YOUTZ

RE: POLICY AND PROCEDURE

Your records are ready for pick up OR you can send payment.

Please include a copy of the fee sheet along with a check or money order payable to:

Pima County Sheriff's Department
1650 E. Benson Highway, Suite C.
Tucson, AZ 85714

Tasks Performed

Jail Records	1	@ \$ 5.00 each	Cost: \$ 5.00
Number of Pages Over 20:		@ \$ 0.25 each	Cost: \$ -
DVDs/CDs Reproduced:		@ \$ 5.00 each	Cost: \$ -
Flash Drive		@ \$ 15.00 each	Cost: \$ -
Photographs - 8 X 12 size:		@ \$ 3.00 each	Cost: \$ -
Photographs - 4 X 6 size:		@ \$ 0.25 each	Cost: \$ -
Labor Charges After One Hour:		@ \$ 15.00 per hour	Cost: \$ -
Miscellaneous:		@	Cost:

Total Cost: \$ 5.00

Amount Paid:

Balance Due: \$ 5.00

Sirianni Youtz
7-2-20

Comments, if applicable:

RECORD MAINTENANCE UNIT

1650 E BENSON HWY #C, DAWN GARDNER
TUCSON, AZ 85714
5205280451

SIRIANNI YOUTZ SPOONEMORE
HAMBURGER PLLC

30-Jun-2020 10:34:00A

1 Rmu Correspondence	\$5.00
----------------------	--------

Total	\$5.00
--------------	---------------

CHECK SALE	\$5.00
------------	--------

Don't Drink and Drive!!!!

Order 99DM75QZ3G90Y

Payment DH0J9NE9ZWN0Y

Clover Privacy Policy
<https://clover.com/privacy>

[REDACTED]

[REDACTED]

[REDACTED]

From: ombudsman@rcgov.us <ombudsman@rcgov.us>
Sent: Thursday, October 8, 2020 10:10 AM
To: Chris Youtz <chris@sylaw.com>
Subject: [External] FOIA Request: 748280 25% Deposit Received

Richland County Ombudsman's Office

2020 Hampton Street, Suite 3061, Columbia, SC 29202

Phone: 803-929-6000 Fax: 803-929-6009



Greetings CHRIS YOUTZ,
Thank you for your FOIA request dated, 9/1/2020 12:42:00 PM. The Ombudsman's Office is in receipt of your non-refundable deposit in the amount of \$9.31.

Once all non-exempt documents have been compiled, you will be notified that the documents are available for release and the balance due of \$27.94 must be paid prior to release. If you elected to pay the total amount due in advance, once all non-exempt documents have been compiled they will be provided to you.

Please feel free to contact our office if we may be of further assistance.

Sincerely,

Richland County Ombudsman



SCOTTS BLUFF COUNTY SHERIFF'S OFFICE

1825 10th Street • Gering, NE 69341

Mark L. Overman, Sheriff

INVOICE

To: Chris R Youtz
Sirianni, Youtz, Spoonemore, Hamburger PLLC
3101 Western Avenue, Suite 350
Seattle WA 98121

Records Request

Total Due: \$14.75

Invoice



DATE	INVOICE #
10/16/19	

BILLED TO:
Chris Youtz 3101 Western Ave; Suite 350 Seattle, WA 98121 chris@sylaw.com

PLEASE MAKE CHECK PAYABLE TO: Sherburne County Sheriff's Office
MAIL CHECK TO: Sherburne County Sheriff's Office Attn: Records Division 13880 Business Center Drive Elk River, MN 55330

ITEM	HOURS	DESCRIPTION	TERMS	
			RATE	AMOUNT
		Data Request 16 pages @ 0.25 per page		\$4.00
Please return copy of invoice with payment. Thank you.			Total Due:	\$ 4.00

Invoice



DATE	INVOICE #
06/03/20	

BILLED TO:
Chris Youtz chris@sylaw.com

PLEASE MAKE CHECK PAYABLE TO: Sherburne County Sheriff's Office
MAIL CHECK TO: Sherburne County Sheriff's Office Attn: Records Division 13880 Business Center Drive Elk River, MN 55330

ITEM	HOURS	DESCRIPTION	TERMS	
			RATE	AMOUNT
		Data Request - Copies of Policies 49 pages @ 0.25 per page		\$12.25
Please return copy of invoice with payment. Thank you.			Total Due:	\$ 12.25



INVOICE NO.

152678125

**

uline.com
PO Box 88741 • Chicago IL 60680-1741

INVOICE

ULINE FED ID#: 36-3684738

SHIPPING SUPPLY SPECIALISTS

THANK YOU FOR YOUR ORDER. ULINE CUSTOMER SINCE 2022

YOUR ORDER # 74600848

SOLD TO:

SHIP TO:



MDG2017 00016332 1 AB 049 1 24777530
SIRIANNI YOUTZ SPOONEMORE HAMB
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871

SIRIANNI YOUTZ SPOONEMORE HAMB
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871

U100-9-2013

CUSTOMER NO	PURCHASE ORDER NO.	SHIP VIA	ORDER DATE	DATE SHIPPED	TERMS	INVOICE DATE
24777530	7915001	UPS GROUND	8/16/22	8/16/22	NET 30 DAYS	8/16/22

QUANTITY			ITEM NUMBER	DESCRIPTION	UNIT PRICE	EXTENDED PRICE
ORDERED	U/M	BACK ORDERED				
1	CT		S-3919	MAIL TRAY STRAP 9/16" 2/CT	52.00	52.00

RECEIVED
AUG 26 2022
Sirianni Youtz
Spoonemore Hamburger PLLC

ORDER PLACED BY: CHRIS YOUTZ

INTERNET /

SUB-TOTAL	SALES TAX	FRT/HNDLING	AMOUNT DUE
52.00	6.84	14.71	73.55

PLEASE PAY FROM THIS INVOICE REFER TO THIS INVOICE NUMBER WHEN CONTACTING US REGARDING THIS TRANSACTION.

CUSTOMER NAME	CUSTOMER NUMBER	INVOICE NUMBER	INVOICE DATE	AMOUNT DUE
SIRIANNI YOUTZ SPOONEMORE HAMB	24777530	152678125	8/16/22	73.55

AMOUNT ENCLOSED
IF DIFFERENT THAN AMOUNT DUE \$ _____
EXPLAIN DIFFERENCES ON REVERSE SIDE



MAKE CHECK PAYABLE AND MAIL TO:

ULINE
ATTN: ACCOUNTS RECEIVABLE
PO BOX 88741
CHICAGO IL 60680-1741

IMPORTANT - PLEASE DETACH AND RETURN THIS PORTION TO INSURE PROPER CREDIT

DECLARATION OF RICHARD E. SPOONEMORE

EXHIBIT 3 Page 102 of 135
2477753001526781252208160000073551



Union Bank® Business Visa® Credit Card

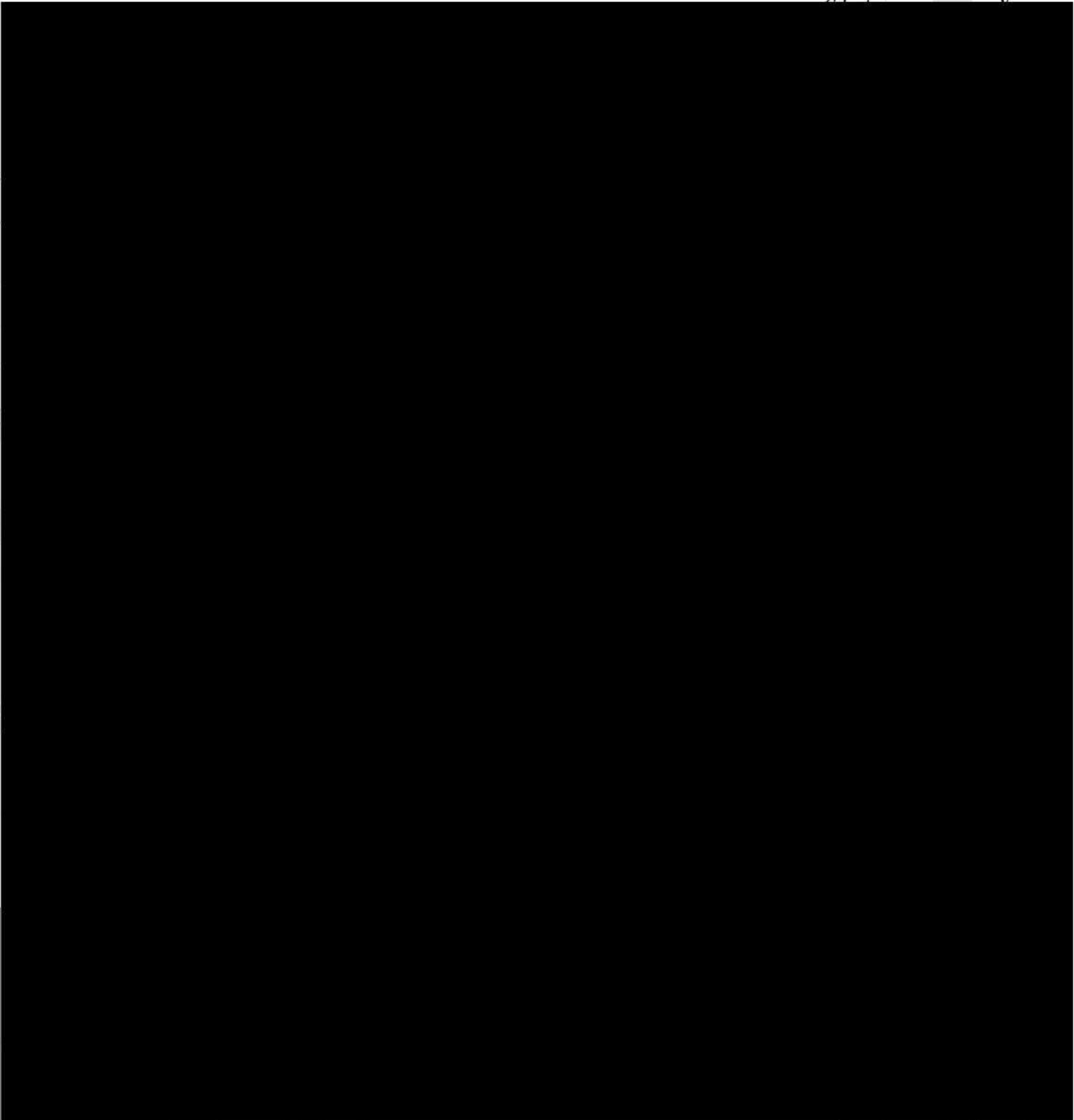
Statement Period: 07/12/19 through 08/11/19

Account Number: [REDACTED]

Transactions (continued)

Trans Date	Reference Number	Description	Amount
------------	------------------	-------------	--------

07/18	2490641572781AXWN	BVD*BeenVerified.com 855-9046471 NY	22.86
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0-1
1-2



Union Bank® Business Visa® Credit Card

Statement Period: 07/12/19 through 08/11/19

Account Number: [REDACTED]

Account Summary

Payment Summary



Closing Date *Am* 08/11/19

Days in Billing Cycle 31

Contact us regarding your account

If Your Card is Lost or Stolen or You Need Assistance:

U.S. and Canada (TDD Available): 888-643-9800
Outside the U.S. and Canada: Dial +1-844-852-2713

Send Inquiries to:

MUFG Union Bank
Credit Card Operations
PO Box 60398
Phoenix AZ 85082-0398

Mail Payments to:

Union Bank
PO Box 650349
Dallas TX 75265-0349

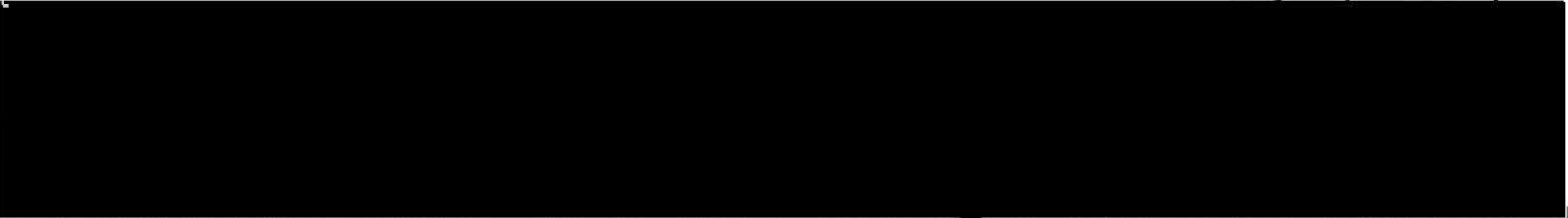
Visit Our Website:

To service your existing credit card: mycreditcard.unionbank.com
For more information about Union Bank products and services: unionbank.com

0-1



Date	Reference Number	Description	Amount
07/10	244310660RQEE7438	WSFERRIES-COLMAN DOCK SEATTLE WA	7915-001 --- 8.50 <i>#</i>



D
E



Union Bank® Business Visa® Credit Card

Statement Period: 07/12/19 through 08/11/19

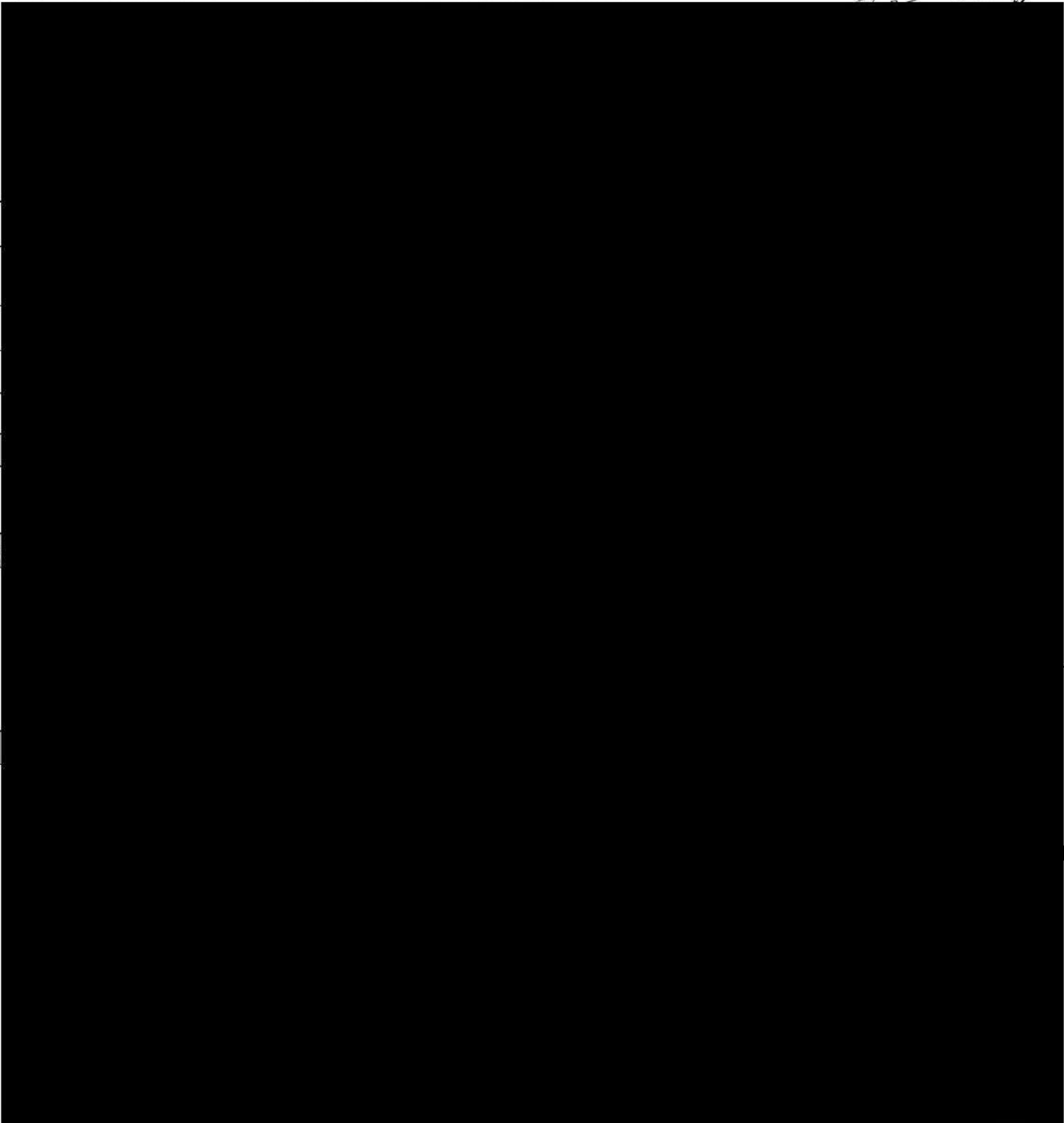
Account Number: [REDACTED]

Transactions (continued)

Trans Date	Reference Number	Description	Amount
07/28	24137466FEJFD12EA	TST* BOAT STREET KITCHEN SEATTLE WA	59.24
07/27	24431066G0RJZWSL9	WA SECRETARY OF STATE .WA.GOV WA	10.00
07/27	24431066G0RK0624V	WA SECRETARY OF STATE .WA.GOV WA	12.50
07/30	24431066K0RZMXKW4	WSP BACKGROUND CHECKS 360-534-2000 WA	11.00

Handwritten notes and corrections:

- Next to 07/28: 7915-001, 59.24
- Next to 07/27: 5601, 10.00
- Next to 07/27: 133.50, 7915-001, 12.50
- Next to 07/30: 11.00



1-1
2-1

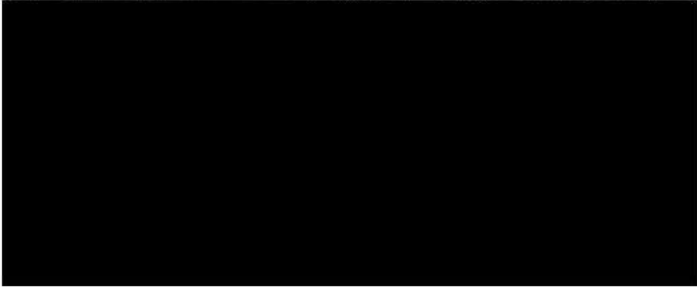


Union Bank® Business Visa® Credit Card
Statement Period: 12/12/19 through 01/10/20

Account Number: [REDACTED]

Account Summary

Payment Summary



Closing Date 01/10/20
Days in Billing Cycle 30

Contact us regarding your account

If Your Card is Lost or Stolen or You Need Assistance:
U.S. and Canada (TDD Available): 888-643-9800
Outside the U.S. and Canada: Dial +1-844-852-2713

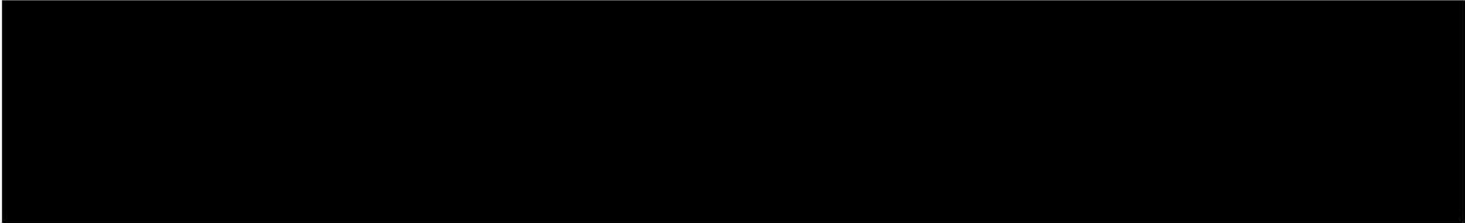
Send Inquiries to:
MUFG Union Bank
Credit Card Operations
PO Box 60398
Phoenix AZ 85082-0398

Mail Payments to:
Union Bank
PO Box 650349
Dallas TX 75265-0349

Visit Our Website:
To service your existing credit card: mycreditcard.unionbank.com
For more information about Union Bank products and services: unionbank.com

Transactions

Trans Date	Reference Number	Description	Amount
12/18	2490641B02F374XX2	BVD*BeenVerified.com 855-9046471 NY	22.86



1084 0001 TKH 002 7 6 200110 0 PAGE 1 of 4 10 3616 1000 Y073 1472

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION

Union Bank Business Visa® Credit Card

Please make checks payable to Union Bank®. Write your account number on your check; include coupon with payment.



\$

Amount Enclosed

Payment Due Date: 02/06/20

Request update or correction to address and complete form on back

Make checks payable to:

SIRIANNI YOUTZ MEIER & SP 1472
RICHARD SPOONEMORE
3101 WESTERN AVE STE 350 DC01
SEATTLE WA 98121-3871

Union Bank
PO Box 650349
Dallas TX 75265-0349



DECLARATION OF RICHARD E. SPOONEMORE
EXHIBIT 3 - Page 107 of 135

42943610100579690000000010000000000022867



Union Bank® Business Visa® Credit Card
Statement Period: 06/11/19 through 07/11/19

Account Number: [REDACTED]

Transactions (continued)

Trans Date	Reference Number	Description	Amount
------------	------------------	-------------	--------



07/10	244921560JJ0A90Z7	LYFT *RIDE WED 8PM LYFT.COM CA	
07/10	244921560JJ07D6B4	LYFT *RIDE WED 6PM LYFT.COM CA	
07/11	2476725600001K9BH	TACO DEL MAR BREMERTON WA	

7915-001 — 9.97 ✓
 " — 10.82 ✓
 " — 29.57



211



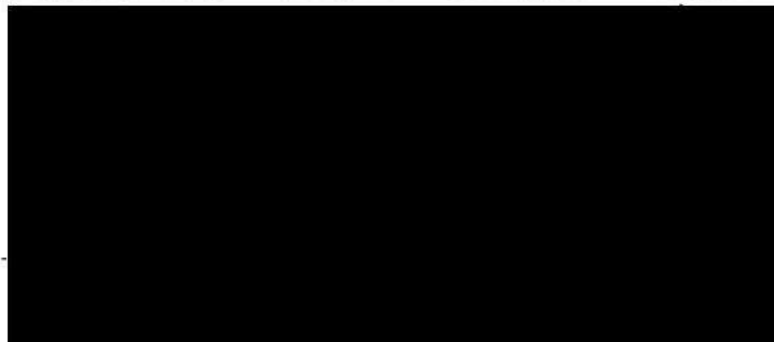
Union Bank® Business Visa® Credit Card

Statement Period: 07/12/19 through 08/11/19

Account Number: [REDACTED]

Account Summary

Payment Summary



Closing Date 08/11/19
Days in Billing Cycle 31

Contact us regarding your account

If Your Card is Lost or Stolen or You Need Assistance:
U.S. and Canada (TDD Available): 888-643-9800
Outside the U.S. and Canada: Dial +1-844-852-2713

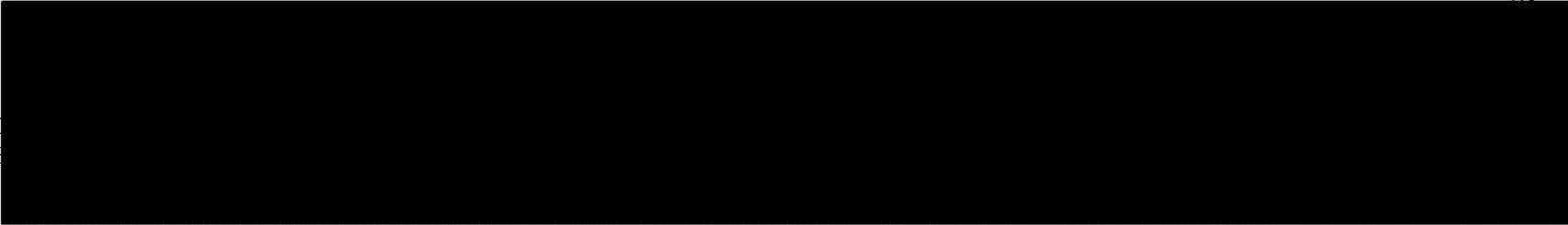
Send Inquiries to:
MUFG Union Bank
Credit Card Operations
PO Box 60398
Phoenix AZ 85082-0398

Mail Payments to:
Union Bank
PO Box 650349
Dallas TX 75265-0349

Visit Our Website:
To service your existing credit card: mycreditcard.unionbank.com
For more information about Union Bank products and services: unionbank.com



Trans Date	Reference Number	Description	Amount
07/10	244310660RQEE7459	WSFERRIES-COLMAN DOCK SEATTLE WA	7915-001 — 8.50



0-1
2-1



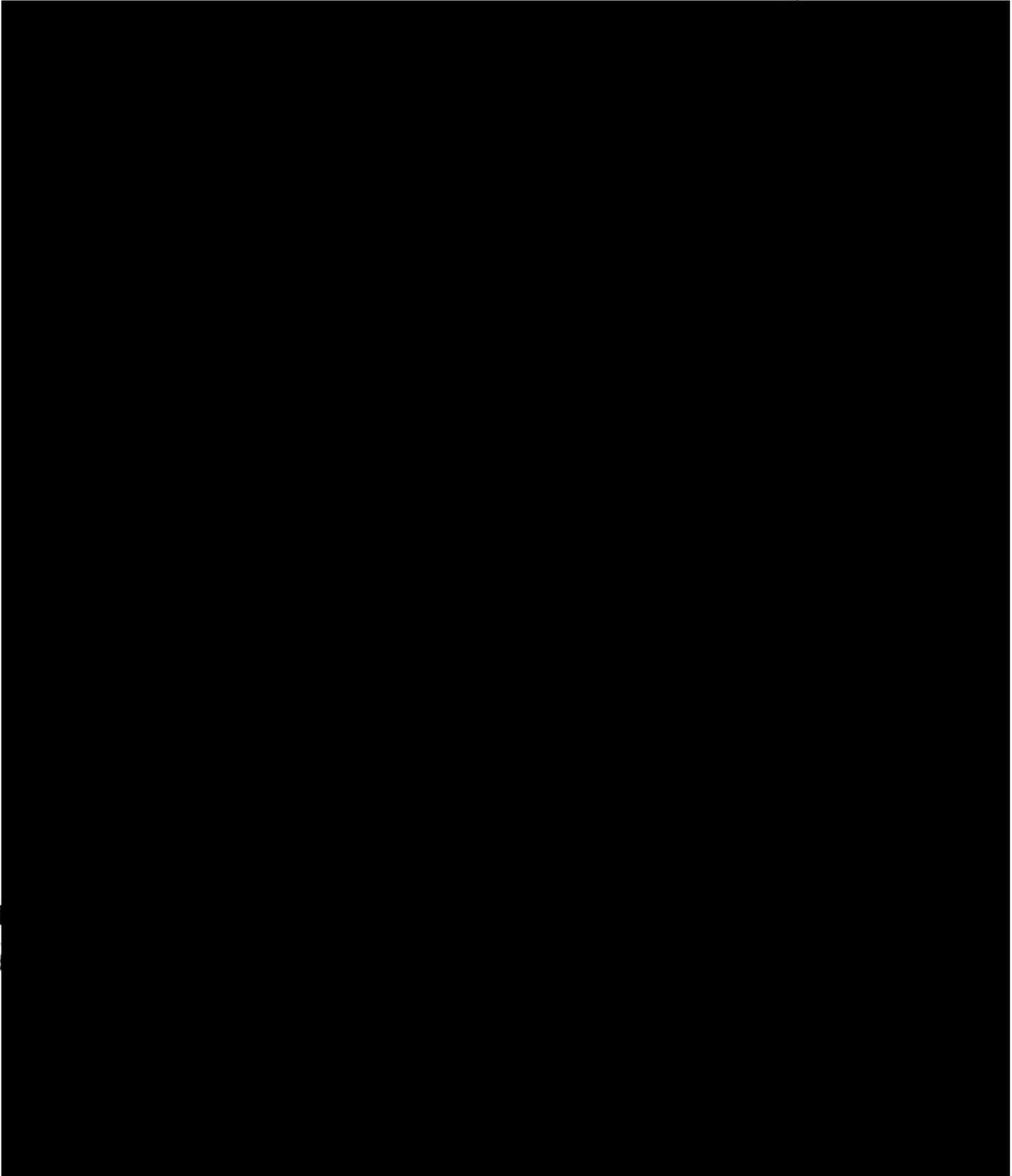
Union Bank® Business Visa® Credit Card

Statement Period: 08/12/19 through 09/10/19

Account Number: [REDACTED]

Transactions (continued)

Trans Date	Reference Number	Description	Amount
08/18	24906417828P5SKG6	BYD*BeenVerified.com 855-9046471 NY	7815-001 - 22.86



0-1
2-1

Union Bank® Business Visa® Credit Card

Statement Period: 09/11/19 through 10/11/19

Account Number: [REDACTED]



Account Summary

Payment Summary

[REDACTED]

[REDACTED]

Closing Date 10/11/19
Days in Billing Cycle 31

Cheq Amount \$21

Contact us regarding your account

If Your Card is Lost or Stolen or You Need Assistance:
U.S. and Canada (TDD Available): 888-643-9800
Outside the U.S. and Canada: Dial +1-844-852-2713

Send Inquiries to:
MUFU Union Bank
Credit Card Operations
PO Box 60395
Phoenix AZ 85082-0398

Mail Payments to:
Union Bank
PO Box 650349
Dallas TX 75265-0349

Visit Our Website:
To service your existing credit card: mycreditcard.unionbank.com
For more information about Union Bank products and services: unionbank.com

2-1

[REDACTED]

09/18 2490641852A86A4GZ BVD*BeenVerified.com 855-9046471 NY

7915-001 - 22.86 ✓

Transactions continued on next page

[REDACTED]



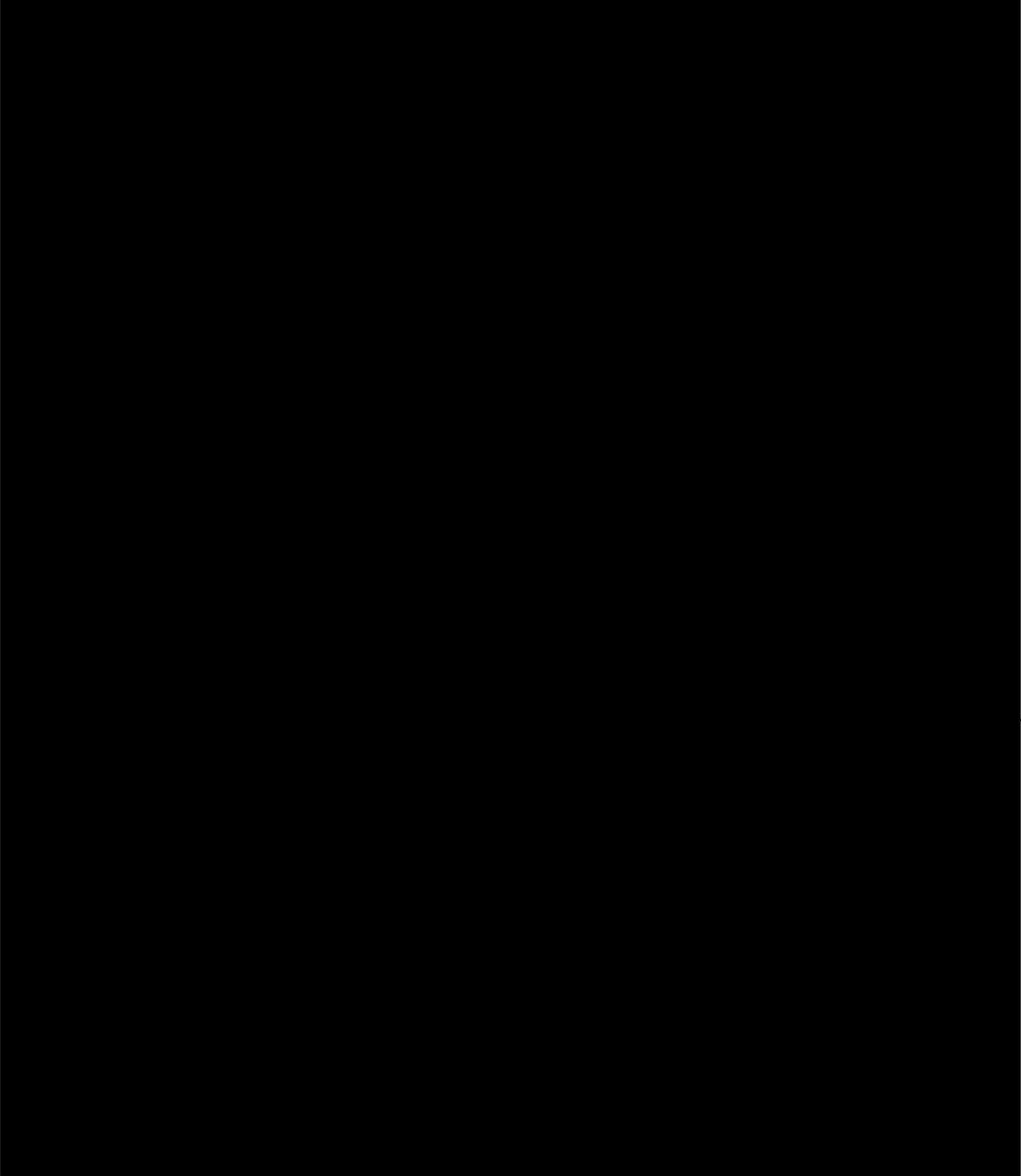
Union Bank Business Visa Credit Card

Statement Period: 10/12/19 through 11/10/19

Account Number: [REDACTED]

Transactions (continued)

Trans Date	Reference Number	Description	Amount
10/18	2490641932BPRGYR2	BVD*BeenVerified.com 855-9046471 NY	7915-001 - 22.86 x 2!



0-1
1-2

1

Client Ledger

Date	Received From/Paid To	Chq#	----- General -----		Bld	----- Trust Activity -----				
Entry #	Explanation	Rec#	Rcpts	Disbs	Fees	Inv#	Acc	Rcpts	Disbs	Balance

7915	Reichert, Jeffrey									
7915-001	Jeffrey Reichert v. Keefe Commissary Network,									Resp Lawyer: CRY
Aug 22/2022	USPS									
316410	Permit No. 2277 - USPS Bulk Mailing	35601		2379.17		16913				

TOTALS PERIOD		UNBILLED			BILLED			BALANCES	
CHE	+ RECOV	+ FEES	= TOTAL	DISBS	+ FEES	+ TAX	- RECEIPTS	= A/R	TRUST
2379.17	0.00	0.00	2379.17	0.00	0.00	0.00	0.00	0.00	0.00

UNBILLED		BILLED			BALANCES	

[REDACTED]

[REDACTED]



Thank you for your payment.

Please print this receipt and keep it for your records.

Request Number : 5323
Request Department : 402015
Organizational Unit : 100
Payment Amount: \$22.00
Convenience Fee: \$1.50
Total Payment Amount: **\$23.50**

Receipt Number: 3785902951

Transaction Date: 07/21/2020 03:23 PM

Payment Type:



Account Number: *7037



Wix.com LTD
40 Namal Tel Aviv, 6350671
Israel

Issued to:

Chris Youtz
3101 Western Avenue Ste 350 Seattle
Washington United States
Sirianni Youtz Spoonemore

Invoice #1003684135 | Jun 29, 2022 | Paid

Description	Site	Billing Period	Quantity	Amount
Premium Plan Pro	Keefe Release Card S	Yearly Jun 29, 2022 - Jun 29, 2023	1	\$324.00

Payment Method: Visa ****7037

Coupon discount - \$162.00
Subtotal \$162.00
TAX (10.25%) \$16.60

Total \$178.60

* Any deductions listed above apply to the current invoice only.

From: Ele Hamburger
Sent: Monday, October 30, 2023 3:13 PM
To: Terri Segadelli; Theresa Redfern
Subject: FW: [External] Order #1883 confirmed

This should be billed to Reichert

From: Wolters Kluwer's ELM Solutions <no-reply@shopifyemail.com>
Sent: Monday, October 30, 2023 2:57 PM
To: Ele Hamburger <ele@syllaw.com>
Subject: [External] Order #1883 confirmed

Wolters Kluwer's ELM Solutions

ORDER #1883

Thank you for your purchase!

[View your order](#)

or [Visit our store](#)

Order summary

	2022 Real Rate Report × 1	\$500.00
	Subtotal	\$500.00
	Shipping	\$0.00
	Taxes	\$0.00
	Total	\$500.00 USD

Customer information

Billing address

Eleanor Hamburger

Sirianni Youtz Spoonemore Hamburger

3101 Western Avenue Suite 350

Seattle WA 98121

United States

Payment

jpmorgan chase

If you have any questions, reply to this email or contact us at

ELMOrderSupport@wolterskluwer.com

Borrower: SIRIANNI YOUTZ SPOONEMORE HAMBURGER
PLLC
3101 WESTERN AVE STE 350
SEATTLE, WA 98121-3871

Lender: WASHINGTON TRUST BANK
Seattle Financial Center
Two Union Square, Suite 4747
601 Union Street
Seattle, WA 98101-2382
(800) 788-4578

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

SPECIFIC PURPOSE. The specific purpose of this loan is: Operating Line/Loan.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CHARGES PAID IN CASH. Borrower has paid or will pay in cash as agreed the following charges:

Prepaid Finance Charges Paid in Cash:	\$5,206.25
\$5,206.25 Accrued Interest	<u> </u>
Total Charges Paid in Cash:	\$5,206.25

FINANCIAL CONDITION. BY SIGNING THIS AUTHORIZATION, BORROWER REPRESENTS AND WARRANTS TO LENDER THAT THE INFORMATION PROVIDED ABOVE IS TRUE AND CORRECT AND THAT THERE HAS BEEN NO MATERIAL ADVERSE CHANGE IN BORROWER'S FINANCIAL CONDITION AS DISCLOSED IN BORROWER'S MOST RECENT FINANCIAL STATEMENT TO LENDER. THIS AUTHORIZATION IS DATED OCTOBER 18, 2023.

BORROWER:

SIRIANNI YOUTZ SPOONEMORE HAMBURGER PLLC

DocuSigned by:
By: Richard E Spoonemore 10/23/2023
SECO6138806D4CC
RICHARD E SPOONEMORE, Managing Member of
SIRIANNI YOUTZ SPOONEMORE HAMBURGER
PLLC

DocuSigned by:
By: Eleanor Hamburger 10/20/2023
5E77DC1672854FD...
ELEANOR HAMBURGER, Managing Member of
SIRIANNI YOUTZ SPOONEMORE HAMBURGER
PLLC



0345

DISBURSEMENT REQUEST AND AUTHORIZATION



Borrower: SIRIANNI YOUTZ SPOONEMORE HAMBURGER
PLLC
3101 WESTERN AVE STE 350
SEATTLE, WA 98121-3871

Lender: WASHINGTON TRUST BANK
Seattle Financial Center
Two Union Square, Suite 4747
601 Union Street
Seattle, WA 98101-2382
(800) 788-4678



SPECIFIC PURPOSE. The specific purpose of this loan is: OPERATING LINE/LOAN.



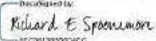
CHARGES PAID IN CASH. Borrower has paid or will pay in cash as agreed the following charges:

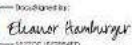
Prepaid Finance Charges Paid in Cash:	\$1,450.00
\$1,450.00 Loan Fee	\$1,450.00
Total Charges Paid in Cash:	\$1,450.00

FINANCIAL CONDITION. BY SIGNING THIS AUTHORIZATION, BORROWER REPRESENTS AND WARRANTS TO LENDER THAT THE INFORMATION PROVIDED ABOVE IS TRUE AND CORRECT AND THAT THERE HAS BEEN NO MATERIAL ADVERSE CHANGE IN BORROWER'S FINANCIAL CONDITION AS DISCLOSED IN BORROWER'S MOST RECENT FINANCIAL STATEMENT TO LENDER. THIS AUTHORIZATION IS DATED OCTOBER 18, 2023.

BORROWER:

SIRIANNI YOUTZ SPOONEMORE HAMBURGER PLLC

By:  10/19/2023
RICHARD E SPOONEMORE, Managing Member of
SIRIANNI YOUTZ SPOONEMORE HAMBURGER
PLLC

By:  10/19/2023
ELEANOR HAMBURGER, Managing Member of
SIRIANNI YOUTZ SPOONEMORE HAMBURGER
PLLC



P.O. Box 2127, Spokane, WA 99210-2127
800.788.4578 | watrust.com

Loan Statement
(800) 788-4578 | watrust.com

OFFICER	JOHN V WALLACE
LOAN #	[REDACTED]
PAYMENT DUE DATE	1/30/23
CURRENT BAL \$	450,000.00
TOTAL AMOUNT DUE \$	2,906.25

SIRIANNI YOUTZ SPOONEMORE HAMBURGER
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871

Thank you for choosing Washington Trust Bank for your lending needs.

MATURITY DATE 9/30/23
INTEREST RATE 7.5000%
INT PD YTD \$0.00
CREDIT LIMIT \$450,000.00
AVAIL CREDIT \$0.00
ESCROW BALANCE \$0.00

PRINCIPAL DUE \$0.00
INTEREST DUE \$2,906.25
ESCROW DUE AMOUNT \$0.00
LATE CHARGES DUE \$0.00
PAST DUE AMOUNT \$0.00
AMOUNT DUE \$2,906.25

DATE	DESCRIPTION OF TRANSACTIONS	AMOUNT	PREVIOUS BALANCE
12/30/22	INTEREST PAYMENT SPLIT OUT	2,718.75	450,000.00

PLEASE DO NOT REMIT PAYMENT. AUTHORIZED ACCOUNT WILL BE DEBITED.
* NOTICE: The Annual Percentage Rate (APR) and Daily Periodic Rate may vary.

PLEASE RETURN BOTTOM PORTION OF STATEMENT WITH YOUR PAYMENT



SIRIANNI YOUTZ SPOONEMORE HAMBURGER
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871

[REDACTED]
AMOUNT DUE \$2,906.25
ADDITIONAL AMT \$ _____
AMOUNT ENCLOSED \$ _____

PLEASE MAKE CHECK PAYABLE TO:
WASHINGTON TRUST BANK
PO BOX 2127
SPOKANE WA 99210-2127





P.O. Box 2127, Spokane, WA 99210-2127
800.788.4578 | watrust.com

Loan Statement
(800) 788-4578 | watrust.com

OFFICER	JOHN Y WALLACE
LOAN #	[REDACTED]
PAYMENT DUE DATE	2/28/23
CURRENT BAL \$	450,000.00
TOTAL AMOUNT DUE \$	2,800.00

SIRIANNI YOUTZ SPOONEMORE HAMBURGER
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871

Thank you for choosing Washington Trust Bank
for your lending needs.

MATURITY DATE 9/30/23
INTEREST RATE 7.7500%
INT PD YTD \$2,906.25
CREDIT LIMIT \$450,000.00
AVAIL CREDIT \$0.00
ESCROW BALANCE \$0.00

PRINCIPAL DUE \$0.00
INTEREST DUE \$2,800.00
ESCROW DUE AMOUNT \$0.00
LATE CHARGES DUE \$0.00
PAST DUE AMOUNT \$0.00
AMOUNT DUE \$2,800.00

DATE	DESCRIPTION OF TRANSACTIONS	AMOUNT	PREVIOUS BALANCE
1/30/23	INTEREST PAYMENT SPLIT OUT	2,906.25	450,000.00
2/02/23	INTEREST RATE CHANGE	7.750000%	450,000.00
2/02/23	DAILY PERIODIC RATE	0.021527%	450,000.00

PLEASE DO NOT REMIT PAYMENT. AUTHORIZED ACCOUNT WILL BE DEBITED.
* NOTICE: The Annual Percentage Rate (APR) and Daily Periodic Rate may vary.

PLEASE RETURN BOTTOM PORTION OF STATEMENT WITH YOUR PAYMENT



SIRIANNI YOUTZ SPOONEMORE HAMBURGER
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871

LOAN # [REDACTED]
AMOUNT DUE \$2,800.00
ADDITIONAL AMT \$ _____
AMOUNT ENCLOSED \$ _____

PLEASE MAKE CHECK PAYABLE TO:
WASHINGTON TRUST BANK
PO BOX 2127
SPOKANE WA 99210-2127





P.O. Box 2127, Spokane, WA 99210-2127
800.788.4578 | watrust.com

Loan Statement
(800) 788-4578 | watrust.com

OFFICER	JOHN V WALLACE
LOAN #	[REDACTED]
PAYMENT DUE DATE	3/30/23
CURRENT BAL \$	450,000.00
TOTAL AMOUNT DUE \$	2,906.25

SIRIANNI YOUTZ SPOONEMORE HAMBURGER
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871

Thank you for choosing Washington Trust Bank for your lending needs.

MATURITY DATE 9/30/23
INTEREST RATE 7.7500%
INT PD YTD \$5,706.25
CREDIT LIMIT \$450,000.00
AVAIL CREDIT \$0.00
ESCROW BALANCE \$0.00

PRINCIPAL DUE \$0.00
INTEREST DUE \$2,906.25
ESCROW DUE AMOUNT \$0.00
LATE CHARGES DUE \$0.00
PAST DUE AMOUNT \$0.00
AMOUNT DUE \$2,906.25

DATE	DESCRIPTION OF TRANSACTIONS	AMOUNT	PREVIOUS BALANCE
2/28/23	INTEREST PAYMENT SPLIT OUT	2,800.00	450,000.00

PLEASE DO NOT REMIT PAYMENT. AUTHORIZED ACCOUNT WILL BE DEBITED.
* NOTICE: The Annual Percentage Rate (APR) and Daily Periodic Rate may vary.

PLEASE RETURN BOTTOM PORTION OF STATEMENT WITH YOUR PAYMENT



SIRIANNI YOUTZ SPOONEMORE HAMBURGER
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871

[REDACTED]
AMOUNT DUE \$2,906.25
ADDITIONAL AMT \$ _____
AMOUNT ENCLOSED \$ _____

PLEASE MAKE CHECK PAYABLE TO:
WASHINGTON TRUST BANK
PO BOX 2127
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OFFICER	JOHN V WALLACE
LOAN #	██████████
PAYMENT DUE DATE	4/30/23
CURRENT BAL \$	450,000.00
TOTAL AMOUNT DUE \$	3,121.88

SIRIANNI YOUTZ SPOONEMORE HAMBURGER
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SEATTLE WA 98121 3871

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MATURITY DATE 9/30/23
INTEREST RATE 8.0000%
INT PD YTD \$8,612.50
CREDIT LIMIT \$450,000.00
AVAIL CREDIT \$0.00
ESCROW BALANCE \$0.00

PRINCIPAL DUE \$0.00
INTEREST DUE \$3,121.88
ESCROW DUE AMOUNT \$0.00
LATE CHARGES DUE \$0.00
PAST DUE AMOUNT \$0.00
AMOUNT DUE \$3,121.88

DATE	DESCRIPTION OF TRANSACTIONS	AMOUNT	PREVIOUS BALANCE
3/23/23	INTEREST RATE CHANGE	8.000000%	450,000.00
3/23/23	DAILY PERIODIC RATE	0.022222%	450,000.00
3/30/23	INTEREST PAYMENT SPLIT OUT	2,906.25	450,000.00

PLEASE DO NOT REMIT PAYMENT. AUTHORIZED ACCOUNT WILL BE DEBITED.
* NOTICE: The Annual Percentage Rate (APR) and Daily Periodic Rate may vary.

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3101 WESTERN AVE STE 350
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LOAN # ██████████
AMOUNT DUE \$3,121.88
ADDITIONAL AMT \$ _____
AMOUNT ENCLOSED \$ _____

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OFFICER	JOHN V WALLACE
LOAN #	██████████
PAYMENT DUE DATE	5/30/23
CURRENT BAL \$	450,000.00
TOTAL AMOUNT DUE \$	3,081.25

SIRIANNI YOUTZ SPOONEMORE HAMBURGER
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SEATTLE WA 98121 3871

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MATURITY DATE 9/30/23
INTEREST RATE 8.2500%
INT PD YTD \$11,734.38
CREDIT LIMIT \$450,000.00
AVAIL CREDIT \$0.00
ESCROW BALANCE \$0.00

PRINCIPAL DUE \$0.00
INTEREST DUE \$3,081.25
ESCROW DUE AMOUNT \$0.00
LATE CHARGES DUE \$0.00
PAST DUE AMOUNT \$0.00
AMOUNT DUE \$3,081.25

DATE	DESCRIPTION OF TRANSACTIONS	AMOUNT	PREVIOUS BALANCE
5/01/23	INTEREST PAYMENT SPLIT OUT	3,121.88	450,000.00
5/04/23	INTEREST RATE CHANGE	8.250000%	450,000.00
5/04/23	DAILY PERIODIC RATE	0.022916%	450,000.00

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LOAN # ██████████
AMOUNT DUE \$3,081.25
ADDITIONAL AMT \$ _____
AMOUNT ENCLOSED \$ _____

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OFFICER	JOHN V WALLACE
LOAN #	[REDACTED]
PAYMENT DUE DATE	6/30/23
CURRENT BAL \$	450,000.00
TOTAL AMOUNT DUE \$	3,196.87

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SEATTLE WA 98121-3871

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MATURITY DATE 9/30/23
INTEREST RATE 8.2500%
INT PD YTD \$14,815.63
CREDIT LIMIT \$450,000.00
AVAIL CREDIT \$0.00
ESCROW BALANCE \$0.00

PRINCIPAL DUE \$0.00
INTEREST DUE \$3,196.87
ESCROW DUE AMOUNT \$0.00
LATE CHARGES DUE \$0.00
PAST DUE AMOUNT \$0.00
AMOUNT DUE \$3,196.87

DATE	DESCRIPTION OF TRANSACTIONS	AMOUNT	PREVIOUS BALANCE
5/30/23	INTEREST PAYMENT SPLIT OUT	3,081.25	450,000.00

PLEASE DO NOT REMIT PAYMENT. AUTHORIZED ACCOUNT WILL BE DEBITED.
* NOTICE: The Annual Percentage Rate (APR) and Daily Periodic Rate may vary.

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LOAN # [REDACTED]
AMOUNT DUE \$3,196.87
ADDITIONAL AMT \$ _____
AMOUNT ENCLOSED \$ _____

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OFFICER	JOHN V WALLACE
LOAN #	██████████
PAYMENT DUE DATE	7/30/23
CURRENT BAL \$	450,000.00
TOTAL AMOUNT DUE \$	3,093.75

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SEATTLE WA 98121 3871

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MATURITY DATE 9/30/23
INTEREST RATE 8.2500%
INT PD YTD \$18,012.50
CREDIT LIMIT \$450,000.00
AVAIL CREDIT \$0.00
ESCROW BALANCE \$0.00

PRINCIPAL DUE \$0.00
INTEREST DUE \$3,093.75
ESCROW DUE AMOUNT \$0.00
LATE CHARGES DUE \$0.00
PAST DUE AMOUNT \$0.00
AMOUNT DUE \$3,093.75

DATE	DESCRIPTION OF TRANSACTIONS	AMOUNT	PREVIOUS BALANCE
6/30/23	INTEREST PAYMENT SPLIT OUT	3,196.87	450,000.00

PLEASE DO NOT REMIT PAYMENT. AUTHORIZED ACCOUNT WILL BE DEBITED.
* NOTICE: The Annual Percentage Rate (APR) and Daily Periodic Rate may vary.

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3101 WESTERN AVE STE 350
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LOAN # ██████████
AMOUNT DUE \$3,093.75
ADDITIONAL AMT \$ _____
AMOUNT ENCLOSED \$ _____

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OFFICER	JOHN V WALLACE
LOAN #	██████████
PAYMENT DUE DATE	8/30/23
CURRENT BAL \$	450,000.00
TOTAL AMOUNT DUE \$	3,303.13

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SEATTLE WA 98121 3871

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MATURITY DATE 9/30/23
INTEREST RATE 8.5000%
INT PD YTD \$21,106.25
CREDIT LIMIT \$450,000.00
AVAIL CREDIT \$0.00
ESCROW BALANCE \$0.00

PRINCIPAL DUE \$0.00
INTEREST DUE \$3,303.13
ESCROW DUE AMOUNT \$0.00
LATE CHARGES DUE \$0.00
PAST DUE AMOUNT \$0.00
AMOUNT DUE \$3,303.13

DATE	DESCRIPTION OF TRANSACTIONS	AMOUNT	PREVIOUS BALANCE
7/27/23	INTEREST RATE CHANGE	8.500000%	450,000.00
7/27/23	DAILY PERIODIC RATE	0.023611%	450,000.00
7/31/23	INTEREST PAYMENT SPLIT OUT	3,093.75	450,000.00

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LOAN # ██████████
AMOUNT DUE \$3,303.13
ADDITIONAL AMT \$ _____
AMOUNT ENCLOSED \$ _____

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OFFICER	JOHN V WALLACE
LOAN #	██████████
PAYMENT DUE DATE	9/30/23
CURRENT BAL \$	450,000.00
TOTAL AMOUNT DUE \$	453,293.75

SIRIANNI YOUTZ SPOONEMORE HAMBURGER
3101 WESTERN AVE STE 350
SEATTLE WA 98121 3871

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MATURITY DATE 9/30/23
INTEREST RATE 8.5000%
INT PD YTD \$24,409.38
CREDIT LIMIT \$450,000.00
AVAIL CREDIT \$0.00
ESCROW BALANCE \$0.00

PRINCIPAL DUE \$450,000.00
INTEREST DUE \$3,293.75
ESCROW DUE AMOUNT \$0.00
LATE CHARGES DUE \$0.00
PAST DUE AMOUNT \$0.00
AMOUNT DUE \$453,293.75

DATE	DESCRIPTION OF TRANSACTIONS	AMOUNT	PREVIOUS BALANCE
8/30/23	INTEREST PAYMENT SPLIT OUT	3,303.13	450,000.00

* NOTICE: The Annual Percentage Rate (APR) and Daily Periodic Rate may vary.

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LOAN # ██████████
AMOUNT DUE \$453,293.75
ADDITIONAL AMT \$ _____
AMOUNT ENCLOSED \$ _____

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OFFICER	JOHN V WALLACE
LOAN #	██████████
PAYMENT DUE DATE	10/30/22
CURRENT BAL \$	450,000.00
TOTAL AMOUNT DUE \$	1,488.66

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SEATTLE WA 98121 3871

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MATURITY DATE	9/30/23	PRINCIPAL DUE	\$0.00
INTEREST RATE	6.2500%	INTEREST DUE	\$1,488.66
INT PD YTD	\$0.00	ESCROW DUE AMOUNT	\$0.00
CREDIT LIMIT	\$450,000.00	LATE CHARGES DUE	\$0.00
AVAIL CREDIT	\$0.00	PAST DUE AMOUNT	\$0.00
ESCROW BALANCE	\$0.00	AMOUNT DUE	\$1,488.66

DATE	DESCRIPTION OF TRANSACTIONS	AMOUNT	PREVIOUS BALANCE
9/28/22	INTEREST RATE CHANGE	6.250000%	0.00
9/28/22	DAILY PERIODIC RATE	0.017361%	0.00
9/30/22	ADVANCE FORCE PAY	2,250.00	2,250.00
10/12/22	EFFECTIVE DATE DEBIT INTEREST	77.73	2,250.00
10/12/22	ADVANCE	447,750.00	450,000.00

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SEATTLE WA 98121-3871

LOAN # ██████████
AMOUNT DUE \$1,488.66
ADDITIONAL AMT \$ _____
AMOUNT ENCLOSED \$ _____

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Sirianni Youtz
Spoonemore Hamburger PLLC

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SEATTLE WA 98121-3871

OFFICER	JOHN V WALLACE
LOAN #	[REDACTED]
PAYMENT DUE DATE	11/30/22
CURRENT BAL \$	450,000.00
TOTAL AMOUNT DUE \$	2,675.00

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MATURITY DATE 9/30/23
INTEREST RATE 7.0000%
INT PD YTD \$1,488.66
CREDIT LIMIT \$450,000.00
AVAIL CREDIT \$0.00
ESCROW BALANCE \$0.00

PRINCIPAL DUE \$0.00
INTEREST DUE \$2,675.00
ESCROW DUE AMOUNT \$0.00
LATE CHARGES DUE \$0.00
PAST DUE AMOUNT \$0.00
AMOUNT DUE \$2,675.00

DATE	DESCRIPTION OF TRANSACTIONS	AMOUNT	PREVIOUS BALANCE
10/31/22	INTEREST PAYMENT SPLIT OUT	1,488.66	450,000.00
11/03/22	INTEREST RATE CHANGE	7.000000%	450,000.00
11/03/22	DAILY PERIODIC RATE	0.019444%	450,000.00

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* NOTICE: The Annual Percentage Rate (APR) and Daily Periodic Rate may vary.

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3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871

LOAN # [REDACTED]
AMOUNT DUE \$2,675.00
ADDITIONAL AMT \$ _____
AMOUNT ENCLOSED \$ _____

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OFFICER	JOHN V WALLACE
LOAN #	[REDACTED]
PAYMENT DUE DATE	12/30/22
CURRENT BAL \$	450,000.00
TOTAL AMOUNT DUE \$	2,718.75

SIRIANNI YOUTZ SPOONEMORE HAMBURGER
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871

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MATURITY DATE 9/30/23
INTEREST RATE 7.5000%
INT PD YTD \$4,163.66
CREDIT LIMIT \$450,000.00
AVAIL CREDIT \$0.00
ESCROW BALANCE \$0.00

PRINCIPAL DUE \$0.00
INTEREST DUE \$2,718.75
ESCROW DUE AMOUNT \$0.00
LATE CHARGES DUE \$0.00
PAST DUE AMOUNT \$0.00
AMOUNT DUE \$2,718.75

DATE	DESCRIPTION OF TRANSACTIONS	AMOUNT	PREVIOUS BALANCE
11/30/22	INTEREST PAYMENT SPLIT OUT	2,675.00	450,000.00
12/15/22	INTEREST RATE CHANGE	7.500000%	450,000.00
12/15/22	DAILY PERIODIC RATE	0.020833%	450,000.00

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SEATTLE WA 98121-3871

LOAN # [REDACTED]
AMOUNT DUE \$2,718.75
ADDITIONAL AMT \$ _____
AMOUNT ENCLOSED \$ _____

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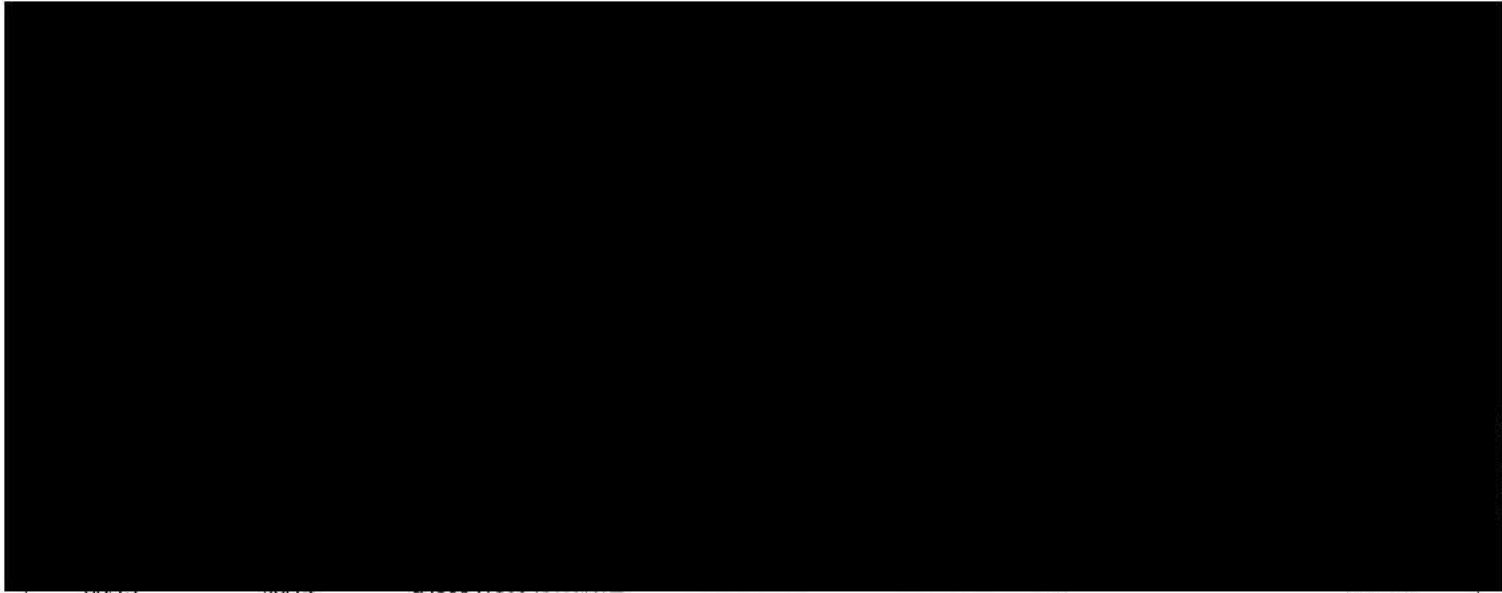


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CHRIS R YOUTZ
SYSH PLLC
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New Balance \$0.00

Minimum Payment Due NONE

Please include your account number on your check.

Payment Due Date						
July						
S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

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Check the box to the left and print changes on back.

Amount Enclosed \$

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CHRIS R YOUTZ
SYSH PLLC
ATTN ELEANOR HAMBURGER
3101 WESTERN AVE STE 350
SEATTLE WA 98121-3871



3917
F306

DECLARATION OF RICHARD E. SPOONEMORE

EXHIBIT 3 - Page 133 of 135

0000000000000000000041295700370510185

Exhibit 4



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The industry's leading
analysis of law firm rates,
trends, and practices



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Table of Contents - 2022 Real Rate Report

A Letter to Our Readers • 4

Report Use Considerations • 5

Section I: High-Level Data Cuts • 8

- Partners, Associates, and Paralegals
- Partners, Associates, and Paralegals by Practice Area and Matter Type
- Partners and Associates by City
- Partners and Associates by City and Matter Type
- Partners by City and Years of Experience
- Associates by City and Years of Experience
- Partners and Associates by Firm Size and Matter Type

Section II: Industry Analysis • 63

- Partners, Associates, and Paralegals by Industry Group
- Partners and Associates by Industry Group and Matter Type
- Basic Materials and Utilities
- Consumer Goods
- Consumer Services
- Financials (Excluding Insurance)
- Health Care
- Industrials
- Technology and Telecommunications

Section III: Practice Area Analysis • 84

- Bankruptcy and Collections
- Commercial
- Corporate: Mergers, Acquisitions, and Divestitures
- Corporate: Regulatory and Compliance
- Corporate: Other
- Employment and Labor
- Environmental
- Finance and Securities
- General Liability (Litigation Only)
- Insurance Defense (Litigation Only)
- Intellectual Property: Patents
- Intellectual Property: Trademarks
- Intellectual Property: Other
- Real Estate

Section IV: In-Depth Analysis for Select US Cities • 172

- Boston, MA
- Chicago, IL
- Los Angeles, CA
- New York, NY
- Philadelphia, PA
- San Francisco, CA
- Washington, DC

Section V: International Analysis • 191

Section VI: Matter Staffing Analysis • 221

Appendix: Data Methodology • 226

A Letter to Our Readers

Welcome to the Wolters Kluwer ELM Solutions Real Rate Report®, the industry's leading data-driven benchmark report for lawyer rates.

Our Real Rate Report has been a relied upon data analytics resource to the legal industry since its inception in 2010 and continues to evolve. The Real Rate Report is powered by the Wolters Kluwer ELM Solutions LegalVIEW® data warehouse, which has grown to include \$155B+ in anonymized legal data.

Last year, we launched our LegalVIEW Insights report series, which presented the first-of-its-kind legal analysis of total outside spend, vendor counts, staffing ratios, and other matters. This year, LegalVIEW Insights has gone even deeper into these issues and, together with the Real Rate Report, is a great tool to benchmark performance and improve from there.

The legal services industry relies on internal analytics and the use of external data resources, such as the LegalVIEW data warehouse, to support legal management strategies. The depth and details of the data in the Real Rate Report enable you to better benchmark and make more informed investment and resourcing decisions for your organization.

As with past Real Rate Reports, all of the data analyzed are from corporations' and law firms' e-billing and time management solutions. We have included lawyer and paralegal rate data filtered by specific practice and sub-practice areas, metropolitan areas, and types of matters to give legal departments and law firms greater ability to pinpoint areas of opportunity. We strive to make the Real Rate Report a valuable and actionable reference tool for legal departments and law firms.

As always, we welcome your comments and suggestions on what information would make this publication more valuable to you. We thank our data contributors for participating in this program. And we thank you for making Wolters Kluwer ELM Solutions your trusted partner for legal industry domain expertise, data, and analytics and look forward to continuing to provide market-leading, expert solutions that deliver the best business outcomes for collaboration among legal departments and law firms.

Sincerely,



Barry Ader

Vice President, Product Management and Marketing
Wolters Kluwer ELM Solutions

Report Use Considerations

2022 Real Rate Report

- Examines law firm rates over time
- Identifies rates by location, experience, firm size, areas of expertise, industry, and timekeeper role (i.e., partner, associate, and paralegal)
- Itemizes variables that drive rates up or down

All the analyses included in the report derive from the actual rates charged by law firm professionals as recorded on invoices submitted and approved for payment.

Examining real, approved rate information, along with the ranges of those rates and their changes over time, highlights the role these variables play in driving aggregate legal cost and income. The analyses can energize questions for both corporate clients and law firm principals.

Clients might ask whether they are paying the right amount for different types of legal services, while law firm principals might ask whether they are charging the right amount for legal services and whether to modify their pricing approach.

Some key factors¹ that drive rates²:

Attorney location - Lawyers in urban and major metropolitan areas tend to charge more when compared with lawyers in rural areas or small towns.

Litigation complexity - The cost of representation will be higher if the case is particularly complex or time-consuming; for example, if there are a large number of documents to review, many witnesses to depose, and numerous procedural steps, the case is likely to cost more (regardless of other factors like the lawyer's level of experience).

Years of experience and reputation - A more experienced, higher-profile lawyer is often going to charge more, but absorbing this higher cost at the outset may make more sense than hiring a less expensive lawyer who will likely take time and billable hours to come up to speed on unfamiliar legal and procedural issues.

Overhead - The costs associated with the firm's support network (paralegals, clerks, and assistants), document preparation, consultants, research, and other expenses.

Firm size - The rates can increase if the firm is large and has various timekeeper roles at the firm. For example, the cost to work with an associate or partner at a larger firm will be higher compared to a firm that has one to two associates and a paralegal.

¹ David Goguen, J.D., University of San Francisco School of Law (2020) Guide to Legal Services Billing Retrieved from: <https://www.lawyers.com/legal-info/research/guide-to-legal-services-billing-rates.html>

² Source: 2018 RRR. Factor order validated in multiple analyses since 2010

Section I: High-Level Data Cuts

Cities

By Years of Experience

2022 - Real Rates for Partner

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2022	2021	2020
San Francisco CA	Fewer Than 21 Years	89	\$481	\$750	\$987	\$768	\$715	\$692
	21 or More Years	149	\$523	\$755	\$994	\$784	\$768	\$764
San Jose CA	Fewer Than 21 Years	13	\$661	\$945	\$1,382	\$1,016	\$970	\$851
	21 or More Years	51	\$665	\$864	\$1,251	\$963	\$982	\$910
Seattle WA	Fewer Than 21 Years	63	\$400	\$500	\$668	\$542	\$476	\$448
	21 or More Years	81	\$495	\$600	\$760	\$625	\$575	\$564
St. Louis MO	Fewer Than 21 Years	30	\$363	\$402	\$461	\$416	\$431	\$427
	21 or More Years	55	\$300	\$429	\$544	\$441	\$431	\$455
Tampa FL	Fewer Than 21 Years	22	\$312	\$372	\$510	\$409	\$402	\$376
	21 or More Years	37	\$375	\$498	\$570	\$495	\$514	\$486
Trenton NJ	21 or More Years	15	\$419	\$553	\$700	\$573	\$642	\$617
Washington DC	Fewer Than 21 Years	364	\$650	\$856	\$980	\$850	\$818	\$780
	21 or More Years	673	\$675	\$890	\$1,096	\$920	\$899	\$870
Wheeling WV	Fewer Than 21 Years	12	\$737	\$762	\$774	\$723	\$720	\$528