

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:

TELEXFREE, LLC,
TELEXFREE, INC., and
TELEXFREE FINANCIAL, INC.,

Debtors

Chapter 11 Cases

14-40987-MSH

14-40988-MSH

14-40989-MSH

Jointly Administered

**THIRD INTERIM APPLICATION FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR MILLIGAN RONA
DURAN & KING LLC, CLASS COUNSEL TO THE DOMESTIC
AND INTERNATIONAL DEFENDANT CLASSES**

To the Honorable Melvin S. Hoffman, United States Bankruptcy Judge:

Milligan Rona Duran & King LLC ("MRDK"), counsel to the defendant classes of "Net Winners" in *Darr v. Argueta*, Adv. Pro. 16-4006 (the "Domestic Case") and *Darr v. Alecci*, Adv. Pro. 16-4007 (the "International Case"), respectfully requests that this Court authorize and order that Stephen B. Darr, the Chapter 11 Trustee, (the "Trustee") of TelexFree LLC, TelexFree, Inc., and TelexFree Financial, Inc. (the "Debtors"), release **\$86,830.00** in reasonable attorneys' fees and **\$872.28** in expense reimbursement to MRDK, covering the period from May 1, 2018 to July 15, 2020. The total amount sought in this Application is: **\$87,702.28**. In support thereof, MRDK states as follows:

INTRODUCTION

1. MRDK requests reasonable compensation and reimbursement from defense funds specifically created by the Trustee for this purpose pursuant to "Class Certification Order and Approval of Class Counsel." See "[Domestic] Class Certification



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Order and Approval of Class Counsel” (*Domestic Case*, ECF No. 194,) attached hereto as Exhibit A, and “[International] Class Certification Order and Approval of Class Counsel” (*International Case*, ECF No. 479), attached hereto as Exhibit B). Under those orders, the Trustee created, and this Court approved, defense funds in the amount of \$225,000 (the “Domestic Defense Fund”) for the Domestic Case, and \$165,000 (the “International Defense Fund”) for the International Case.

2. This Application is also made pursuant to Fed. R. Bankr. P. 2016 and Massachusetts Bankruptcy Local Rule 2016-1.

3. In this Application for fees and expenses, MRDK requests a total of **\$87,702.28**. This amount consists of two components.

4. First, MRDK requests \$45,167.50 in reasonable attorneys’ fees and \$33.00 in costs, totaling **\$45,200.50**, from the **International Defense Fund**. See Exhibit I. This amount covers the period from May 1, 2018 to July 15, 2020. With respect to the International Defense Fund, this is MRDK’s second request for compensation and reimbursement.¹ In MRDK’s first request, this Court approved \$67,585.00 in attorneys’ fees and \$39.46 in cost and expense reimbursement from the International Defense Fund, covering the period March 24, 2017 to April 25, 2018. (ECF Nos. 995, 1006).

¹ In this bankruptcy case MRDK has submitted two prior interim applications for compensation and reimbursement. The first application requested and was approved for reimbursement from the Domestic Defense Fund only. The second application requested and was approved for reimbursement from both the Domestic and International Defense Funds. For the two prior fee applications, please see ECF Nos. 903 & 995; and for their corresponding approvals, please see ECF Nos. 913 and 1006.

Accordingly, as it relates to MRDK's work in the International Case, there is no temporal overlap between this application and the prior applications.

5. Second, MRDK requests \$41,662.50 in reasonable attorneys' fees and \$839.28 in costs, totaling **\$42,501.78**, from the **Domestic Defense Fund**. See Exhibit J. This amount covers the period from May 1, 2018 to July 15, 2020. With respect to the Domestic Defense Fund, this is MRDK's third interim fee application. In MRDK's First Interim Application, this Court approved \$97,912.50 in attorneys' fees and \$1,349.62 in cost and expense reimbursement from the Domestic Defense Fund, covering the period April 26, 2016 to July 31, 2017. (ECF Nos. 903, 913). Further, in MRDK's Second Interim Application, this Court approved \$47,422.50 in attorneys' fees and \$692.81 in cost and expense reimbursement from the Domestic Defense Fund, covering the period August 1, 2017 to April 25, 2018. (ECF Nos. 995, 1006). Accordingly, as it relates to MRDK's work in the Domestic Case, there is no temporal overlap between this application and the prior applications.

6. There is currently **\$77,622.57** remaining in the Domestic Defense Fund and **\$97,375.54** remaining in the International Defense Fund.

7. This fee application covers the following general tasks: (1) MRDK's work with its experts to refute the Trustee's allegations; (2) MRDK's communication with Domestic and International Class members; (3) MRDK's review and evaluation of proposals to streamline these cases by the Trustee; (4) MRDK's work with its experts to determine the viability of cost-effective mechanisms to potentially resolve these cases; (5) MRDK's review of the Trustee's expert report; (6) MRDK's work with its experts in

their preparation of an expert report for the purposes of rebutting the report of the Trustee's expert; (7) MRDK's drafting of a preliminary counterproposal for a class-wide resolution opportunity; (8) MRDK's initial research and drafting of future dispositive motions, including a motion for summary judgment and defense against the Trustee's likely motion for summary judgment; (9) MRDK's updating of the class website and FAQs directed at class members; (10) MRDK's drafting oppositions to motions to intervene in the domestic and international cases filed by Intervenor Defendant Rahima Boughalem (*see Domestic Case ECF 347 & International Case ECF 502*); (11) MRDK's monitoring of these matters and the related Bankruptcy case for filings that could impact the class members' interests, including claims and filings related to claims allowance; and (12) MRDK's work on this Fee Application.

8. MRDK continues to promote the collective rights of the Domestic and International Class members and continues to work toward a resolution that is just, fair, and efficient.

BACKGROUND

9. On January 15, 2016, the Trustee initiated these matters by filing initial complaints in both the Domestic Case and International Case.

10. The Trustee alleged that the Debtors operated a massive Ponzi scheme, defrauding hundreds of thousands of people out of billions of dollars. In the Domestic Case, the Trustee alleged that roughly 15,000 "Net Winners" located in the U.S. illegally profited from the Debtors' fraud. Similarly, in the International Case, the Trustee alleged that roughly 60,000 to 80,000 "Net Winners," located outside the U.S., illegally

profited from the Debtors' fraud. The Net Winners located in the U.S. comprise the Domestic Class sued in the Domestic Case, and the Net Winners located outside the U.S. comprise the International Class sued in the International Case. Both complaints specifically named a number of the larger Net Winners, referring to them as "Named Defendants." Both the Domestic Class and the International Class dispute the Trustee's allegations.

11. On the same day that the initial complaints were filed, the Trustee filed motions for class certification, asking the Court to find that the Named Defendants will "fairly and adequately represent the interest of the Class." (*Domestic Case*, ECF No. 2.); (*International Case*, ECF No. 2.) The motions also asked the Court to appoint class counsel in both cases.

MRDK's Appointment as Domestic Class Counsel

12. On October 6, 2016, this Court certified the defendant Net Winner class in the Domestic Case, appointed Franz Balan as Domestic Class representative, appointed MRDK as class counsel, and created the Domestic Defense Fund in the amount of \$225,000 and a \$87,500 fund for expert fees See Exhibit A (*Domestic Case*, ECF No. 194.)

13. MRDK has devoted significant attorney time to furthering the interests of the Domestic Class. For example: in early 2017, MRDK filed an Amicus Brief in the related matter, *Darr v. Dos Santos*, Adv. Pro. 15-04055, arguing that the Debtor had at least a defeasible interest in the alleged transfers because they were Debtor's commissions that fell within the Massachusetts Wage Act; MRDK worked closely with StoneTurn Group to obtain, review, and analyze TelexFree's enormous database known as "Sistemas de

Informações Gerenciais” (“SIG”); MRDK then worked closely with StoneTurn to prepare, refine, and present to StoneTurn’s opinions concerning flaws in the assumptions underpinning the Trustee’s “net equity” calculations; and finally, MRDK set up an internal infrastructure, including a website and mass email capability, to communicate with thousands of class members.

MRDK’s Appointment as International Class Counsel

14. On May 9, 2017, MRDK filed a motion to designate Marco Puzzarini as class representative and appoint MRDK as class counsel for the International Class.

(*International Case*, ECF No. 423.)

15. Also, on May 9, 2017, MRDK filed a motion to dismiss the International Case, on behalf of Marco Puzzarini and *all* other class members (the “Motion to Dismiss”).

(*International Case*, ECF Nos. 425 & 426.) MRDK spent considerable time preparing this motion, and the accompanying memorandum, which argued that: (1) the Trustee could not assert personal jurisdiction over the 60,000 or more foreign defendants who had no minimum contacts with the United States; and (2) that this Court should refuse to hear the case based on the doctrine of *forum non conveniens*.

16. On June 21, 2017, MRDK argued the Motion to Dismiss that was filed on behalf of Mr. Puzzarini and the rest of the International Class.

17. While MRDK’s motion to dismiss was ultimately denied (*International Case*, ECF No. 453), the Motion to Dismiss nevertheless tested the jurisdictional sufficiency of the claims against the International Class. *See* Memorandum in Support of Motion to Dismiss. (*International Case*, ECF No. 426.)

18. On July 26, 2017, Mr. Puzzarini was appointed as class representatives of the International Class and MRDK was appointed class counsel. (*International Case*, ECF No. 473.) At the Court's order, Sandro Paulo Freitas ("Mr. Freitas") was appointed as an additional class representative.

19. On August 3, 2017, after further negotiations between the Trustee and MRDK, this Court issued a full version of the agreed-to order regarding class certification, which created the International Defense Fund in the amount of \$165,000, and a \$60,000 fund for expert fees. See Exhibit B (*International Case*, ECF No. 479.)

BRIEF SUMMARY OF SERVICES

20. This Application covers one time period, May 1, 2018 to July 15, 2020. During this period MRDK performed work that benefited both the Domestic and the International Classes. For this work MRDK requests fees in the amount of \$45,167.50 in the International Case (Exhibits C & I) and \$41,662.50 in the Domestic Case (Exhibits D & J), for a total of \$86,830.00 in fees.

21. For purposes of billing, MRDK has created and maintains two separate client-matters for the Domestic and International Cases in the firm's billing software. In many instances, MRDK has made a determination that work has benefited both the International and Domestic Classes equally and in a manner that does not allow for the work to be solely attributed to one case to the exclusion of the other. In such instances, MRDK has split the applicable time entries in a manner that reflects an equal apportionment of attorney time to both cases. In splitting such entries, MRDK has used the following steps: (1) MRDK first rounded *down* the time entry to the nearest even

tenth of an hour (*e.g.* 2.3 hours was rounded down to 2.2 hours); and (2) MRDK then divided the time entry by two and applied equal time to each matter (*e.g.* 1.1 hours billed to the Domestic Case and 1.1 hours billed to the International Case). In all other situations where the work performed benefited only one of the defendant classes, time entries were only recorded in the corresponding matter. In such cases, none of the fees directly attributable to the Domestic Case have been billed to the International Case and *vice versa*.

22. In accordance with Bankruptcy Rule 2016 and MLBR 2016-1, MRDK provides further detail regarding the services provided by MRDK below. During the time period covered by this Application, MRDK has performed the following tasks:

- a. Worked with its experts to further review and analyze the Debtor's SIG data, for the purposes of refuting the Trustee's allegations;
- b. Worked with its experts to determine the viability of cost-effective mechanisms to potentially resolve these cases;
- c. Worked with its experts to respond to the Trustee's expert report and prepare a rebuttal report;
- d. Internally explored potential resolution mechanisms for both cases, reviewing the documents and data available in these matters, and considering a variety of potential models that could provide interested class members an opportunity to resolve claims against them through settlement;

- e. Held conferences with the Trustee to discuss the potential avenues and mechanisms by which Class Members might individually resolve the claims against them prior to judgment;
- f. Reviewed and evaluated a proposal to streamline these cases by the Trustee;
- g. Researched and drafted a preliminary proposal for a class-wide opportunity for resolution of these cases;
- h. Sent communications to the entire group of Domestic and International Class Members regarding the litigation process, the status of the case, and the potential next steps;
- i. Revised the website www.telexfreelawsuit.com to provide answers to frequently asked questions posed by members of the International and Defendant Classes;
- j. Held strategy sessions with Class Representatives;
- k. Researched case law supporting defenses to be used in a potential future motion for summary judgment;
- l. Researched potential case law to be used to defend against a potential future motion for summary judgment by the Trustee;
- m. Drafted oppositions to motions to intervene in the domestic and international cases filed by Intervenor Defendant Rahima Boughalem; and

- n. Monitored the dockets of these matters and the related Bankruptcy case for filings that could impact the class members' interests, including claims and filings related to the claim allowance.

23. MRDK has also incurred reasonable and necessary litigation expenses totaling \$872.28. (Exhibit H.) These expenses, which are itemized in and attached as Exhibits F & G, include translation services, communication costs, PACER fees and legal research fees.

24. As set forth above, the total amount of compensation and reimbursement sought in this Application is \$ 87,702.28. (Exhibit E & Exhibit H, Grand Totals.)

25. MRDK states that the compensation and expenses herein sought belong solely to the firm and its attorneys, and such fees will not be divided, shared or pooled, directly or indirectly, with any other person or firm.

26. MRDK and its attorneys have not received or been promised any other payments for the services covered in this Application.

27. This is MRDK's third interim fee application. In MRDK's First Interim Application, this Court approved \$97,912.50 in reasonable and necessary attorneys' fees and \$1,349.62 in cost and expense reimbursement. (ECF No. 913.) MRDK was paid the aforementioned amounts from the Domestic Defense Fund. In MRDK's Second Interim Application, this Court approved \$115,007.50 in reasonable and necessary attorneys' fees and \$732.27 in cost and expense reimbursement. (ECF No. 1006.) MRDK was paid the aforementioned amounts from each of the International Defense Fund and the Domestic Defense Fund, as attributable. Except for the foregoing, no retainer, partial

payment, or interim allowances have been requested by or paid to MRDK in these adversary proceedings.

28. Pursuant to Bankruptcy Rule 2016 and MLBR 2016-1, MRDK submits the following information in support of the request for compensation and reimbursement of expenses:

- a. A copy of the Court's orders reciting the terms and conditions of employment and compensation (Exhibits A & B);
- b. A copy of the Court's orders authorizing MRDK as class counsel and approving the Domestic Defense Fund of \$225,000 and the International Defense Fund of \$165,000 from the Estate (Exhibits A & B);
- c. A brief narrative summary of the services rendered by MRDK (¶ 22, supra);
- d. A chart breaking down MRDK's 283.7 total hours expended, showing the full name and initials of each attorney who worked on the case, and detailing the number of hours expended by each attorney for each of the two adversary proceedings:
 - i. Attributable to the International Case, May 1, 2018 to July 15, 2020 (Exhibits C & I); and
 - ii. Attributable to the Domestic Case, May 1, 2018 to July 15, 2020 (Exhibits D & J);

- iii. Attributable to both the International Case and the Domestic Case (Exhibit E).
- b. A table showing the grand totals per timekeeper within the firm (Exhibit E);
- c. Contemporaneous attorney time records describing the specific services performed each day by each person with the time broken down into units of tenths of one hour devoted to such services (Exhibits I & J);
- d. Expense sheets, breaking down the \$872.28 in expenses into each individual expense (Exhibits F & G); and
- e. A brief biography of each person included in the fee application, stating his or her background and experience (Exhibit K).

WHEREFORE, MRDK respectfully requests that this Court enter an order regarding compensation and reimbursement of expenses, as follows:

- i. That MRDK be paid \$45,167.50 in reasonable attorneys' fees and \$33.00 in reasonable and necessary costs and expenses from the International Defense Fund;
- ii. That MRDK be paid \$41,662.50 in reasonable attorneys' fees and \$839.28 in reasonable and necessary costs and expenses from the Domestic Defense Fund; and
- iii. Accordingly, the total amount sought in this Application is **\$ 87,702.28**.

Respectfully Submitted,

MILLIGAN RONA DURAN & KING LLC

Dated: July 24, 2020

/s/ Ilyas J. Rona

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EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In re:

TELEXFREE, LLC,
TELEXFREE, INC. and
TELEXFREE FINANCIAL, INC.,

Debtors.

STEPHEN B. DARR AS HE IS THE
TRUSTEE OF THE CHAPTER 11 ESTATES
OF EACH OF THE DEBTORS,

Plaintiff,

v.

BENJAMIN ARGUETA, ALEXANDRO
ROCHA, JOSE NETO, JULIO C. PAZ,
EUZEBIO SUDRE NETO, HUGO
ALVARADO, ANA R. RAMOS, LINDA
SUZANNE HACKETT, RUDDY ABREAU,
MARCO ALMEIDA, RODRIGO
MONTEMOR, LAUREANO ARELLANO,
AARON ATAIDE, ROSANE CRUZ, OMAR
QUINONEZ, CARLOS C. DEJESUS,
BILKISH SUNESARA, ANDRES BOLIVAR
ESTEVEZ, JOSE LOPEZ, ANA ROSA
LOPEZ, FRANTZ BALAN, MARCELO
DASILVA, GLADYS ALVARADO, MARIA
TERESA MILAGRES NEVES, MARCOS
LANA, LUIZ ANTONIO DA SILVA, BRUNO
GRAZIANI, EDUARDO N. SILVA, MICHEL
CHRISTIANO SANTOLIN DE ARRUDA,
FRANCISDALVA SIQUEIRA, ALEXANDER
N. AURIO, AMILCAR LOPEZ, RENATO
SACRAMENTO, JULIO SILVA, DAVIDSON
R. TEIXEIRA, JOSE CARLOS MACIEL,
JESUS OSUNA, CHAI HOCK NG, EDILENE
STORCK NAVARRO, SORAYA FERREIRA,
EDSON F. SOUZA, VAMING SERVICES,
JORGE ANTONIO MEJIA SEQUEIRA,
RODRIGO CASTRO, DAVID REIS,

Chapter 11 Cases

14-40987-MSH
14-40988-MSH
14-40989-MSH

Jointly Administered

Adversary Proceeding
No. 16-04006

ANA SANTOS, WESLEY DIAS, TIMEX RESEARCH CONSULTING, INC., CELSO ROBERTO SILVA FILHO, TEAM GLOBAL ADVERTISING LLC, LWC MARKETING, INC., BARTOLO CASTLLO, GASPAR JESUS, LUISA E. LOPEZ, MARCIO SOUZA NERY, DEBORA C. BRASIL, JOELITO SOUZA CALDAS JUNIOR, UNITED GROUP USA, JEAN 2004, ENTERPRISE CORP., RUDMAR GENTIL, NEW GENERATION MED SUPPLY, INC., DANEUNG XIONG, CARLOS ALFARO, LUSETTE BALAN, TECHNOVIA, INC., FAITH SLOAN, MARIZA S. MORINELLI, NUBIA R. GLOULART, ROBERTO NUNEZ, GILSON NASSAR, BINGJIAN PAN, YUE CHEN, RODRIGO R. BREDAS, PAULO GIULIANO DIOGENES DE BESSA ROSADO, JOSE MIGUEL FILHO, LAN LAN JI, VENERANDO CONTRERAS, JAP INTERNATIONAL NETWORK, LLC, WALACE AUGUSTO DA SILVA, EZAU SOARES FERREIRA, EDDIT ALBERTO DUVERGE, GLOBAL MARKETING STRATEGIES, CAROL VANTERPOOL, DEVENDRA SHAH, PAT JACKSON, SILVERIO REYES, FABIANA ACACIA DA CRUZ DOS SANTOS, GERALD AGNEW, DWAYNE JONES, JOSEPH PIETROPAOLO, JAMILSON MARCO CONCEICAO, SONYA CROSBY, RANDY CROSBY, WESLEY NASCIMENTO ALVESBY, ANTONIO OLIVEIRA, RONEIL BARRETO, MILAGROS ADAMES, LM DAVAR, INC., PARROT BAY HOMES, INC., EDGAR BORELLI, RICHARDO FABIN, DANIEL CHAVEZ, FAUSTINO TORRES, HELIO BARBOSA, GELALIN-3377, LLC AND A DEFENDANT CLASS OF NET WINNERS, Defendant(s).

**CLASS CERTIFICATION ORDER
AND APPROVAL OF CLASS COUNSEL**

After notice and hearing, and for good cause shown, the Motion for Certification of a Defendant Class consisting of Net Winners¹ [docket entry 2] filed by Stephen B. Darr (the “Trustee”) is granted under Rule 23(a) and 23(b)(1) of the Federal Rules of Civil Procedure, as incorporated by Rule 7023 of the Federal Rules of Bankruptcy Procedure. The Court makes the following findings:

I. BACKGROUND

1. This litigation was commenced by the Trustee seeking to recover money paid to various Participants who received more in payments (both in direct transactions and Triangular Transactions) than the Participants paid directly or through Triangular Transactions to the Debtors, e.g., Net Winners. The Trustee has brought this action seeking a certification of a class of defendants consisting of all Net Winners residing in the United States of America. The Trustee asserts that the domestic Net Winner class consists of approximately 15,000 individuals or entities and the aggregate Net Winner payments exceed one hundred million dollars (\$100,000,000.00).

2. The Trustee asserts that he may recover the payments to Net Winners as Fraudulent Transfers pursuant to Section 548 of the Bankruptcy Code and the payments made within ninety (90) days of the commencement of these proceedings as preferences pursuant to Section 547 of the Bankruptcy Code. The Court has previously ruled that (1) the Debtors engaged in a Ponzi scheme, (2) claims are to be determined on a net equity basis and only Participants who paid more to the Debtors, either directly or through Triangular Transactions, than they received from the Debtors, either directly or through Triangular Transactions, will have an Allowed Claim (“Net Losers”) [docket entries 654, 687 in case no. 14-40987].

¹ Terms not otherwise defined herein shall have the meaning set forth in the *Memorandum in Support of Plaintiff's Motion for Class Certification*, docket entry 3.

II. DISCUSSION

3. The Federal Rules of Civil Procedure allow for a Defendant Class. Rule 23(a) states that “[o]ne or more members of a class may sue *or be sued*” Fed. R. Civ. P. 23(a) (It is apparent from the words of Rule 23(a) “sue or be sued as representative parties” that [suits] against a Defendant Class are permitted. *See Tilley v. TJX Companies, Inc.*, 345 F.3d 34, 37 (1st Cir. 2003) (Rule 23 treats plaintiff and defendant classes the same). Defendant Class actions have been certified when, as here, there is a need for a “procedural device that allows one who has a common grievance against a multitude of persons to resolve . . . the dispute by using only a few members of the class.”) *Broadhollow Funding Corp. v. Fitzmaurice (In re Broadhollow Funding Corp.)*, 66 B.R. 1005, 1007 (Bankr. E.D.N.Y. 1986).

4. A Defendant Class may be certified if it meets four prerequisites: (1) numerosity; (2) commonality; (3) typicality; and (4) fair and adequate representation. Fed. R. Civ. P. 23(a). In addition to meeting the four prerequisites of Rule 23(a), certification of the proposed class requires satisfaction of one of the class requirements set forth in Rule 23(b).

A. Rule 23(a) Analysis

Numerosity

5. It is undisputed that the proposed class meets the numerosity requirements, as it consists of approximately 15,000 Net Winner Defendants, who are dispersed throughout the United States. [Darr Decl. ¶ 31] The sheer number of the members of the proposed class and geographic diversity satisfy the numerosity requirement. *Kerrigan v. Phila. Bd. of Edu.*, 284 F.R.D. 740 (E.D.P. 2008); and *In re Carbon Black Antitrust Litig.*, 03-10191-DPW, 2005 WL 102966 (D. Mass. Jan. 18, 2005).

Commonality

whether the payments from TelexFree to class members are fraudulent transfers that must be disgorged and repaid and whether the payments from TelexFree must be disgorged and repaid as preferential transfers.

8. Moreover, individual circumstances do not impact the commonality requirement. As a fraudulent transfer case, the Trustee's case focuses on whether there was a fraudulent transfer to all the Net Winners that must be repaid, without regard to the individual circumstances of participation in the scheme. Accordingly, the Court finds that the core common issues of law and fact that exist herein satisfy the commonality requirement.²

Typicality

9. The third prerequisite shifts the focus from the characteristics of the class members to the characteristics of the named class representatives. *See In re Broadhollow*, 66 B.R. at 1009. The typicality requirement addresses whether the "the claims or defenses of the representative parties are typical of the claims or defenses of the class." Fed. R. Civ. P. 23(a)(3). Frantz Balan, a named Defendant, has been proposed to serve as Class Representatives.

10. The typicality requirement does not mandate that the defenses of the representative parties and the class be completely identical or perfectly coextensive *In re Integra Realty Resources, Inc.*, 175 B.R. 264 (Bankr. D. Colo. 1995, *aff'd* 354 F.3d 1246 (10th Cir. 2004)). Rather, it is sufficient if the defenses are substantially similar and "there is a nexus

² The Supreme Court's decision in *Wal-Mart*, its most recent look at the commonality requirement, has no bearing on this case. The plaintiffs failed the commonality test in *Wal-Mart*, mainly because of the unique nature of their claims. They sought to represent a class of 1.5 million female employees alleging that Wal-Mart had discriminated against them in employment by delegating pay and promotion decisions to local managers. The Court focused on the absence of a single, common policy that the plaintiffs were challenging; the whole point of their claims was that they were challenging many local policies and practices. There is no such issue here: the Trustee alleges a single Ponzi or pyramid scheme, with essentially identical transactions that carry essentially identical legal consequences for the Net Winners under bankruptcy law.

between class representatives/claims or defenses and common questions of fact or law which unite the class.” *In re Integra Realty Resources Inc.*, 179 B.R. at 270. Here, the Trustee alleges that the proposed Class Representative and class members participated in the same event and course of conduct that has given rise to the Defendant Class; that is, they are all accused of participating in and receiving more from TelexFree than they paid to TelexFree. Because the Class Representative is alleged to have participated in the same TelexFree scheme, he inevitably shares the same defenses against liability for repayment of the alleged fraudulent transfers made to the class, which does not depend on the personal circumstances of particular affiliates. *See Weinman*, 354 F. 3d at 1265. The Court finds that the typicality requirement is satisfied.

Fairly and Adequately Represent the Class

11. The last prerequisite for certification is that the proposed class representatives and their counsel be able to fairly and adequately represent the interests of the Defendant Class. Fed. R. Civ. P. 23(a)(4). In determining whether a named representative in a class action is “a fair and adequate representative,” some courts have applied a two-pronged test: (1) the representative must be able to conduct the litigation; and (2) the representative’s interests must not be antagonistic to those of the class members. *See Weinman*, 179 B.R. at 270-71; *see also Baehr v. Creig Northrop Team, P.C.*, WDQ-13-0933, 2014 WL 346635, at *9 (D. Md. Jan. 29, 2014) (noting representation is adequate if the named representatives’ interests are not opposed to those of the other class members, and the attorneys are “qualified, experienced and able to conduct the litigation”) (citing *Mitchell-Tracey v. United Gen. Title Ins. Co.*, 237 F.R.D. 551, 558 (D. Md. 2006)); *Harris v. Rainey*, 299 F.R.D. 486, 490-91 (W.D. Va. 2014).

12. Here, the proposed Class Representative’s interests are not antagonistic to but aligned with, the interests of the unnamed class members because they share the common

objective to defend against having to return funds received from TelexFree as demanded by the Trustee. Thus, there is no conflict which would defeat adequacy of representation. *See Harris*, 299 F.R.D. at 491 (recognizing that “[a] conflict must be fundamental to defeat adequacy of representation; a conflict is not fundamental when all class members ‘share common objectives and the same factual and legal oppositions and have the same interest in establishing the liability of defendants.’”) (quoting *Ward v Dixie Nat. Life Ins. Co.*, 595 F.3d 164, 180 (4th Cir. 2010) and *Gunnells v. Healthplans Servs., Inc.*, 348 F.3d 417, 431 (4th Cir. 2003)).

13. Further, the named Class Representative Frantz Balan is alleged to be a significant Net Winner of the TelexFree scheme. Allegedly, Frantz Balan received over \$500,000 from TelexFree (either individually or together with another family member). The proposed Class Representative is not likely to abandon or return these substantial sums without mounting a vigorous defense. Frantz Balan, the proposed Class Representative, has an arrangement with the law firm of Milligan Rona Duran & King LLC (“MRDK”). MRDK, the law firm proposed to be retained by Mr. Balan, is experienced and has qualified attorneys, fully capable of protecting the interests of their clients and consequently the class [See *Decl. of Ilyas Rona in Support of Motion to Designate Class Representative, Appoint Milligan Rona Duran & King LLC as Class Counsel and Create Defense Fund*, docket entry 189]

14. The participation of Class Counsel will serve to expedite the resolution of the action, resolution of the Class issues and provide for the most expeditious and least expensive method to accomplish these goals. Class Counsel will result in a substantial contribution to the Estates in resolving the claims and maximizing the return to Net Losers. *See Gray v. Shapiro (In re Dehon)*, 298 B.R. 206 (Bankr. D. Mass. 2003).

15. The Court finds that Defendants and their counsel can and will adequately represent the class.

B. Rule 23(b) Analysis

16. Rule 23(b)(1), under which the Trustee seeks to certify the Net Winner class, permits class certification in instances where prosecuting separate actions would either create:

- (A) inconsistent or varying adjudications with respect to individual class members that would establish incompatible standards of conduct for the party opposing the class; or
- (B) adjudications with respect to individual class members that, as a practical matter, would be dispositive of the interests of the other members not parties to the individual adjudications or would substantially impair or impede their ability to protect their interests.

Fed. R. Civ. P. 23(b)(1).

17. Courts have certified Defendant Classes pursuant to Rule 23(b)(1)(A) in actions involving voidable preferences and fraudulent conveyances “to insure that separate proceedings would not result in inconsistent adjudication of the common issues, thus leaving the trustee in a stalemated position.” *In re Broadhollow*, 66 B.R. at 1013 (finding certification under 23(b)(1)(A) warranted and adopting reasoning in *Guys v. Abdulla*, 57 F.R.D. 14 (N.D. Ohio 1972)).³ If the Trustee herein was forced to file separate actions against the 15,000 Defendants, he would certainly be risking inconsistent and varying adjudications. If one court found that a fraudulent transfer occurred, but another court did not, then those inconsistent decisions would place the Trustee in a stalemated or conflicted position. If the Trustee attempted to enforce a valid judgment against a particular Defendant that Defendant might refuse to pay because other Defendants similarly situated were not held to be liable for the same underlying conduct related to TelexFree. These conflicting results would leave the Trustee in an untenable position, and

³ In *Guy v. Abdulla*, the court certified a defendant class under Rule 23(b)(1)(A) so that the bankruptcy trustee could maintain an action against all parties allegedly holding voidable preferences and property transferred by fraudulent conveyances without the risk of inconsistent adjudication of the common issues.

circumstances such as these are precisely why class actions exist. *See Guy v. Abdulla*, 57 F.R.D. at 17-18.

18. The Court also finds that Rule 23(b)(1)(B) certification is appropriate. Advisory Notes to Rule 23 indicate that a “fraudulent conveyance” is exactly the type of situation where a class should be certified because separate adjudication “will necessarily or probably have an adverse practical effect.” Fed. R. Civ. P. 23 advisory committee’s note. In *Integra Realty Resources*, the Court of Appeals for the Tenth Circuit upheld class certification under Rule 23(b)(1)(B) in a class action involving questions of whether a fraudulent transfer occurred and whether there was an unlawful dividend distributed. *Integra Resources*, 354 F 3d at 1263-64. The court noted that the first suit against a defendant or group of defendants could be dispositive of all remaining suits and would decide the rights of absent defendants “without the class action’s assurance that they be adequately represented.” *Id.* at 1264. The court reasoned that, as here, a defendant “has only a small number of possible individual defenses” and “the primary legal and factual issues in the first case would not only form the basis for the application of stare decisis in subsequent cases; they would almost inevitably prove dispositive in those cases.” *Id.*

19. A Defendant Class action certified under Rule 23(b)(1) is fair to the Defendants, particularly relatively small Net Winners. The efficiency of one action in which all parties can argue their case and assert their rights will benefit both TelexFree and small winners and supports the intent behind both Rule 23(b)(1)(A) and (b)(1)(B). While the Court is mindful of due process concerns as well as other problems specific to Defendant Class actions, the Court finds a class action is the only means to reasonably and efficiently resolve the Trustee’s claims against 15,000 Net Winners.

Based on the foregoing, the Court makes the following further rulings and findings:

A. The proposed class of defendants (the “Class”) is so numerous and geographically dispersed that joinder of all members is impracticable;

B. There are questions of law and fact common to all class members including but not limited to that the common claims, issues, defenses of the Class include but are not limited to: (i) what transfers should be included in the determination of a Net Winner; (ii) whether Net Winners should be determined by an aggregation of Related User Accounts; (iii) whether the initial methodology for determining Related User Accounts is reasonable; (iv) whether the information maintained on the Debtors’ SIG records with respect to each Participant transactions with the Debtor and other Participants is reasonably reliable; (v) whether the Net Winner Payments are avoidable as fraudulent transfers because the Debtors had the actual intent to hinder, delay, or defraud creditors; (vi) whether the Net Winner Payments are avoidable as fraudulent transfers because the transfers were made for less than fair consideration while the Debtors were insolvent, undercapitalized, or unable to pay debts as they became due; (vii) whether the Net Preference Payments may be recovered as preferential transfers; (viii) whether the Court’s finding that the Debtors engaged in a Ponzi and pyramid scheme may be applied, along with any applicable presumptions, in determining the Trustee’s claims.

C. The defenses of Frantz Balan as the putative Class Representative are typical of the defenses of the Class;

D. Franz Balan as the Class Representative will fairly and adequately represent the interests of the Class;

E. The prosecution of separate actions by or against individual members of the Class would create the risk that adjudications with respect to individual members of the class would as a practical matter be dispositive of the interests of the other members not parties to the

adjudications, or may be inconsistent or varying, or substantially impair or impede the ability of Class members to protect their interests;

F. The questions of law and fact common to the members of the Class predominate over any questions affecting only individual members, and a class action is superior to other methods for fair and efficient adjudication of the controversy;

THEREFORE, IT IS HEREBY ORDERED THAT:

1. The proposed class action complaint satisfies the requirements of Fed. R. Civ. P. 23(a) and (b) as adopted by Fed. R. Bankr. P. 7023 and the Motion is granted, except as inconsistent with the terms of this Order.

2. The Court certifies a Class of all persons who reside in the United States, who purchased at least one membership plan ("Plan") or voice over internet ("VoIP") package from one or more of the Debtors ("a Participant"), and who satisfy one or both of the following criteria:

- (i) Is alleged to be a "Net Winner," that is, a Participant who is alleged to have received more from the Debtors and from other persons in connection with the purchase of Plans or VoIP packages than such Participant paid to the Debtors or to other persons in connection with the purchase of Plans or VoIP packages, as determined based upon an aggregation of all activity in the User Accounts of a Participant ("Related User Accounts");
- (ii) Is alleged to be a Net Winner as defined in section (i) above who also is alleged to have been a Net Winner with respect to transactions occurring in the 90 days prior to the bankruptcy filings.

3. The Class is certified under Fed. R. Civ. P. 23(a) and 23(b)(1). Accordingly, no member of the Class shall be permitted to opt out of the class, and each and every member of the class shall be bound by all orders or judgments of this Court in this adversary proceeding. At any time during the proceedings, the court may, upon motion or *sua sponte*, exercise its discretion under Fed. R. Civ. P. 23(c) and (d) to create sub-classes, remove or replace the Class Representative, or otherwise condition the conduct of this adversary proceeding in order to fairly and adequately protect the rights of the Class members.

4. Frantz Balan is appointed as the Class Representative.

5. The Class Representative has selected MRDK to serve as class counsel. The Court has reviewed the Affidavit submitted by Attorney Rona as to his qualifications to serve as class counsel and finds him qualified.

6. MRDK is hereby appointed Class Counsel for the Net Winner Class and shall serve until further order of the Court. Notice of the certification of the Net Winner Class and the appointment of MRDK as Class Counsel shall be sent to the members of the Class by the Trustee.

7. The Trustee is authorized to utilize estate funds in an aggregate amount not to exceed Two Hundred and Twenty Five Thousand Dollars (\$225,000.00) to pay Class Counsel for legal fees and cost incurred by Class Representative provided that (i) Class counsel submit a fee application that satisfies the requirement of the Bankruptcy Code, Federal Rules of Bankruptcy Procedure and the Massachusetts Local Bankruptcy Rules (MLBR), including without limitation MLBR 2016-1 and applicable case law in this district and (ii) any payment shall be authorized by this Court upon notice and after all interested parties have an opportunity to be heard.

8. The Trustee is authorized to utilize estate funds in an aggregate amount not to exceed Eighty Seven Thousand Five Hundred Dollars (\$87,500.00) to pay fees and cost incurred by Class Representative for his Expert to assist Class Counsel in representation of the Class provided that (i) the Expert submit a fee application that satisfies the requirement of the Bankruptcy Code, Federal Rules of Bankruptcy Procedure and the MLBR, including without limitation MLBR 2016-1 and applicable case law in this district and (ii) any payment shall be authorized by this Court upon notice and after all interest parties have an opportunity to be heard.

9. MRDK is authorized to communicate with the Net Winner Class as it deems reasonable and necessary through such means that it believes to be most efficient and cost-effective. The Trustee will provide to MRDK contact information, primarily email addresses, to facilitate MRDK's communications with the members of the Net Winner Class and the Trustee will assist the Class representative in sending Notices to the Class members.

10. MRDK is authorized and instructed to explain to the Net Winner Class that in the event that liability on one or more of the Trustee's claims is established, the Trustee intends to seek a process to determine the net winnings of each Net Winner Class member. Therefore, it is not necessary for any net winner to communicate with MRDK related to determining the amount of his or her net winnings because each member of the Class will have an opportunity to address those issues in the damages process ordered by the Court.

11. MRDK is authorized and instructed to inform the members of the Net Winner Class, if they have not already done so, to gather and preserve any documents or information (including electronic files) related to the amount each paid into and received from TelexFree so those documents and that information can be used in the later process to determine the amount of their individual net winnings.

12. MRDK is hereby appointed to serve without bond and shall have full power and authority to act in the best interests of the Net Winner Class. MRDK and its agents, acting within the scope of MRDK's duties, are entitled to rely on all outstanding rules of law and Orders of this Court and shall not be liable to anyone for their own good faith compliance with any order, rule, law, judgment, or decree. In no event shall MRDK be liable to anyone for its good faith compliance with its duties and responsibilities as Class Counsel, nor shall MRDK be liable to anyone for any actions taken or omitted except upon a finding by this Court that it acted or failed to act as a result of malfeasance, bad faith, gross negligence, or in reckless disregard of its duties.

13. Subject to this Court's having jurisdiction, this Court shall hear any action filed against MRDK based upon acts or omissions committed in its representative capacity.

14. In the event MRDK decides to resign, it shall first give written notice to the Court of its intention, and the resignation shall not be effective until the Court appoints a successor.

15. The Trustee has expressed a willingness to consider voluntary settlements on the Trustee's claims with TelexFree's Net Winners and others against whom the Trustee has claims. Accordingly, members of the Net Winner Class and the Trustee are permitted to discuss a potential settlement of the Trustee's claims against them even though they have become members of the Net Winner Class.

16. The Trustee is instructed to post, in English, Spanish and Portuguese, a copy of this order on the Claims and Noticing Agent's website and to send a copy to all potential Net Winners. Any member of the Net Winner Class or other interested person who objects to this order must file such objection within 30 days of the date of its entry. The Court finds that there is no just cause to delay the implementation of the agreement reflected in this order pending the

objection period, but may revise or terminate this order after review of any objections filed.

However, any fees incurred by MRDK prior to modification of this order shall be paid in accordance with the order.

Dated at Boston this 6th day of October, 2016



Hon. Melvin S. Hoffman
Chief United States Bankruptcy Judge

711465-v1

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In re:

TELEXFREE, LLC,
TELEXFREE, INC. AND
TELEXFREE FINANCIAL, INC.,

Debtors.

Chapter 11

Case Nos. 14-40987-MSH

14-40988-MSH

14-40989-MSH

Jointly Administered

STEPHEN B. DARR, AS HE IS THE TRUSTEE
OF THE CHAPTER 11 ESTATES OF EACH OF
THE DEBTORS,

Plaintiff,

Adversary Proceeding

No. 16-4007

v.

PAOLA ZOLLO ALECCI, et al. and a
Defendant Class of Net Winners,

Defendants.

**CLASS CERTIFICATION ORDER
AND APPROVAL OF CLASS COUNSEL**

After notice and hearing, and for good cause shown, the Motion for Certification of a Defendant Class consisting of Net Winners¹ [docket entry 2] filed by Stephen B. Darr (the “Trustee”) is granted under Rule 23(a) and 23(b)(1) of the Federal Rules of Civil Procedure, as incorporated by Rule 7023 of the Federal Rules of Bankruptcy Procedure. The Court makes the following findings:

I. BACKGROUND

¹ Terms not otherwise defined herein shall have the meaning set forth in the *Memorandum in Support of Plaintiff’s Motion for Class Certification*, docket entry 3.

1. This litigation was commenced by the Trustee seeking to recover money paid to various Participants who received more in payments (both in direct transactions and Triangular Transactions) than the Participants paid directly or through Triangular Transactions to the Debtors, i.e., Net Winners. The Trustee has brought this action seeking a certification of a class of defendants consisting of all Net Winners residing outside the United States of America. The Trustee asserts that the non-US Net Winner class consists of approximately 80,000 individuals or entities and the aggregate Net Winner payments exceed \$1,200,000,000.

2. The Trustee asserts that he may recover the payments to Net Winners as fraudulent transfers pursuant to Section 548 of the Bankruptcy Code and the payments made within ninety (90) days of the commencement of these proceedings as preferences pursuant to Section 547 of the Bankruptcy Code. The Court has previously ruled that (1) the Debtors engaged in a Ponzi scheme, (2) claims are to be determined on a net equity basis and only Participants who paid more to the Debtors, either directly or through Triangular Transactions, than they received from the Debtors, either directly or through Triangular Transactions, will have Allowed Claims (“Net Losers”) [docket entries 654, 687 in case no. 14-40987].

II. DISCUSSION

3. The Federal Rules of Civil Procedure allow for a Defendant Class. Rule 23(a) states that “[o]ne or more members of a class may sue *or be sued*” Fed. R. Civ. P. 23(a) (It is apparent from the words of Rule 23(a) “sue or be sued as representative parties” that [suits] against a Defendant Class are permitted. *See Tilley v. TJX Companies, Inc.*, 345 F.3d 34, 37 (1st Cir. 2003) (Rule 23 treats plaintiff and defendant classes the same). Defendant Class actions have been certified when, as here, there is a need for a “procedural device that allows one who has a common grievance against a multitude of persons to resolve . . . the dispute by using only a

few members of the class.” *Broadhollow Funding Corp. v. Fitzmaurice (In re Broadhollow Funding Corp.)*, 66 B.R. 1005, 1007 (Bankr. E.D.N.Y. 1986).

4. A Defendant Class may be certified if it meets four prerequisites: (1) numerosity; (2) commonality; (3) typicality; and (4) fair and adequate representation. Fed. R. Civ. P. 23(a). In addition to meeting the four prerequisites of Rule 23(a), certification of the proposed class requires satisfaction of one of the class requirements set forth in Rule 23(b).

A. Rule 23(a) Analysis

(1) Numerosity

5. It is undisputed that the proposed class meets the numerosity requirements, as it consists of approximately 80,000 Net Winner Defendants, who are dispersed throughout the world. [Darr Decl. ¶ 31] The sheer number of the members of the proposed class and geographic diversity satisfy the numerosity requirement. *Kerrigan v. Phila. Bd. of Edu.*, 284 FRD 740 (E.D.P. 2008); and *In re Carbon Black Antitrust Litig.*, 03-10191-DPW, 2005 WL 102966 (D. Mass. Jan. 18, 2005).

(2) Commonality

6. The “commonality” factor examines whether there are “questions of law or fact common to the class.” Fed. R. Civ. P. 23(a)(2). Here, the common questions include, among others, (i) what transfers should be included in the determination of a Net Winner; (ii) whether Net Winners should be determined by an aggregation of Related User Accounts; (iii) whether the Net Winner Payments are avoidable as fraudulent transfers because the Debtors had the actual intent to hinder, delay, or defraud creditors; (iv) whether the Net Winner Payments are avoidable as fraudulent transfers because the transfers were made for less than fair consideration while the Debtors were insolvent, undercapitalized, or unable to pay debts as they became due; (v) whether

the Net Preference Payments may be recovered as preferential transfers; (vi) whether the Court's finding that the Debtors engaged in a Ponzi and pyramid scheme may be applied, along with any applicable presumptions, in determining the Trustee's claims. "It is not required that all factual or legal questions raised in the lawsuit be common so long as a single issue is common to all class members." *Weinman v. Fid. Capital Appreciation Fund (In re Integra Realty Res., Inc.)*, 170 B.R. 264, 270 (Bankr. D. Colo. 1995); *see also In re Cardinal Indus.*, 105 B.R. 834, 844 (Bankr. S.D. Ohio 1989) ("There need only exist one significant issue or fact common to all members of the putative class.") (citing *Newburg on Class Actions* § 3.10).

7. The proposed class members in this action share a common set of facts. The Trustee alleges that all class members had or controlled usernames and accounts with TelexFree through which the Trustee can trace all of the transactions, whether the transaction is either a direct or a Triangular Transaction. Further, class members are alleged to have received more money from TelexFree than they paid into TelexFree (their "Net Winnings") during the course of their alleged participation in TelexFree's scheme. There are also common questions of law, that is: whether the payments from TelexFree to class members are fraudulent transfers that must be disgorged and repaid and/or preferential transfers that must be disgorged and repaid.

8. Moreover, individual circumstances do not impact the commonality requirement. As a fraudulent transfer case, the Trustee's case focuses on whether there was a fraudulent transfer to all the Net Winners that must be repaid, without regard to the individual circumstances of participation in the scheme. Accordingly, the Court finds that the core common issues of law and fact that exist herein satisfy the commonality requirement.²

² The Supreme Court's decision in *Wal-Mart Stores, Inc. v. Dukes*, 564 U.S. 338 (2011), its most recent look at the commonality requirement, has no bearing on this case. The plaintiffs failed the commonality test in *Wal-Mart*, mainly because of the unique nature of their claims. They sought to represent a class of

(3) Typicality

9. The third prerequisite shifts the focus from the characteristics of the class members to the characteristics of the named class representatives. *See In re Broadhollow*, 66 B.R. at 1009. The typicality requirement addresses whether the “the claims or defenses of the representative parties are typical of the claims or defenses of the class.” Fed. R. Civ. P. 23(a)(3). Marco Puzzarini and Sandro Paulo Freitas have been proposed to serve as Class Representatives.

10. The typicality requirement does not mandate that the defenses of the representative parties and the class be completely identical or perfectly coextensive *In re Integra Realty Resources, Inc.*, 175 B.R. 264 (Bankr. D. Colo. 1995, aff’d 354 F.3d 1246 (10th Cir. 2004). Rather, it is sufficient if the defenses are substantially similar and “there is a nexus between class representatives/claims or defenses and common questions of fact or law which unite the class.” *In re Integra Realty Resources Inc.*, 179 B.R. at 270. Here, the Trustee alleges that the proposed Class Representatives and class members participated in the same event and course of conduct that has given rise to the Defendant Class; that is, they are all accused of participating in and receiving more from TelexFree than they paid to TelexFree. Because the Class Representatives are alleged to have participated in the same TelexFree scheme, they inevitably share the same defenses against liability for repayment of the alleged fraudulent transfers made to the class, which does not depend on the personal circumstances of particular affiliates. *See Weinman*, 354 F. 3d at 1265. The Court finds that the typicality requirement is satisfied.

1.5 million female employees alleging that Wal-Mart had discriminated against them in employment by delegating pay and promotion decisions to local managers. The Court focused on the absence of a single, common policy that the plaintiffs were challenging; the whole point of their claims was that they were challenging many local policies and practices. There is no such issue here: the Trustee alleges a single Ponzi or pyramid scheme, with essentially identical transactions that carry essentially identical legal consequences for the Net Winners under bankruptcy law.

11. The Court has also previously determined that it has personal jurisdiction over the Class Representatives.

(4) Fairly and Adequately Represent the Class

12. The last prerequisite for certification is that the proposed class representatives and their counsel be able to fairly and adequately represent the interests of the Defendant Class. Fed. R. Civ. P. 23(a)(4). In determining whether a named representative in a class action is “a fair and adequate representative,” some courts have applied a two-pronged test: (1) the representative must be able to conduct the litigation; and (2) the representative’s interests must not be antagonistic to those of the class members. *See Weinman*, 179 B.R. at 270-71; *see also Baehr v. Creig Northrop Team, P.C.*, WDQ-13-0933, 2014 WL 346635, at *9 (D. Md. Jan. 29, 2014) (noting representation is adequate if the named representatives’ interests are not opposed to those of the other class members, and the attorneys are “qualified, experienced and able to conduct the litigation”) (citing *Mitchell-Tracey v. United Gen. Title Ins. Co.*, 237 F.R.D. 551, 558 (D. Md. 2006)); *Harris v. Rainey*, 299 F.R.D. 486, 490-91 (W.D. Va. 2014).

13. Here, the proposed Class Representatives’ interests are not antagonistic to but aligned with the interests of the unnamed class members because they share the common objective to defend against having to return funds received from TelexFree as demanded by the Trustee. Thus, there is no conflict which would defeat adequacy of representation. *See Harris*, 299 F.R.D. at 491 (recognizing that “[a] conflict must be fundamental to defeat adequacy of representation; a conflict is not fundamental when all class members ‘share common objectives and the same factual and legal oppositions and have the same interest in establishing the liability of defendants.’”) (quoting *Ward v Dixie Nat. Life Ins. Co.*, 595 F.3d 164, 180 (4th Cir. 2010) and *Gunnells v. Healthplans Servs., Inc.*, 348 F.3d 417, 431 (4th Cir. 2003)).

14. Further, the named Class Representatives are alleged to be significant Net Winners of the TelexFree scheme. Allegedly, Marco Puzzarini received more than \$334,000 from TelexFree and Sandro Paulo Freitas received more than \$1,647,000 from TelexFree (either individually or together with other family member(s)). The proposed Class Representatives are not likely to abandon or return these substantial sums without mounting a vigorous defense. The proposed Class Representatives have an arrangement with the law firm of Milligan Rona Duran & King LLC (“MRDK” or “Class Counsel”). MRDK, the law firm proposed to be retained by the Class Representatives, is experienced and has qualified attorneys, fully capable of protecting the interests of their clients and consequently the class [See *Decl. of Ilyas Rona in Support of Motion to Designate Class Representative, Appoint Milligan Rona Duran & King LLC as Class Counsel and Create Defense Fund*, docket entry 424]

15. The participation of Class Counsel will serve to expedite the resolution of the action, resolve the Class issues and provide for the most expeditious and least expensive method to accomplish these goals. Class Counsel will result in a substantial contribution to the Estates in resolving the claims and maximizing the return to Net Losers. See *In re Dehon*, 298 B.R. 206 (Bankr. D. Mass. 2003).

16. The Court finds that Defendants and their counsel can and will adequately represent the class.

B. Rule 23(b) Analysis

17. Rule 23(b)(1), under which the Trustee seeks to certify the Net Winner class, permits class certification in instances where prosecuting separate actions would either create:

- (A) inconsistent or varying adjudications with respect to individual class members that would establish incompatible standards of conduct for the party opposing the class; or

- (B) adjudications with respect to individual class members that, as a practical matter, would be dispositive of the interests of the other members not parties to the individual adjudications or would substantially impair or impede their ability to protect their interests.
- Fed. R. Civ. P. 23(b)(1).

18. Courts have certified Defendant Classes pursuant to Rule 23(b)(1)(A) in actions involving voidable preferences and fraudulent conveyances “to insure that separate proceedings would not result in inconsistent adjudication of the common issues, thus leaving the trustee in a stalemated position.” *In re Broadhollow*, 66 B.R. at 1013 (finding certification under 23(b)(1)(A) warranted and adopting reasoning in *Guys v. Abdulla*, 57 F.R.D. 14 (N.D. Ohio 1972)).³ If the Trustee herein was forced to file separate actions against the 80,000 Defendants, he would certainly be risking inconsistent and varying adjudications. If one court found that a fraudulent transfer occurred, but another court did not, then those inconsistent decisions would place the Trustee in a stalemated or conflicted position. If the Trustee attempted to enforce a valid judgment against a particular Defendant that Defendant might refuse to pay because other Defendants similarly situated were not held to be liable for the same underlying conduct related to TelexFree. These conflicting results would leave the Trustee in an untenable position, and circumstances such as these are precisely why class actions exist. *See Guy v. Abdulla*, 57 F.R.D. at 17-18.

19. The Court also finds that Rule 23(b)(1)(B) certification is appropriate. Advisory Notes to Rule 23 indicate that a “fraudulent conveyance” is exactly the type of situation where a class should be certified because separate adjudication “will necessarily or probably have an adverse practical effect.” Fed. R. Civ. P. 23 advisory committee’s note. In *Integra Realty*

³ In *Guy v. Abdulla*, the court certified a defendant class under rule 23(b)(1)(A) so that the bankruptcy trustee could maintain an action against all parties allegedly holding voidable preferences and property transferred by fraudulent conveyances without the risk of inconsistent adjudication of the common issues.

Resources, the Tenth circuit upheld class certification under Rule 23(b)(1)(B) in a class action involving questions of whether a fraudulent transfer occurred and whether there was an unlawful dividend distributed. *Integra Resources*, 354 F 3d at 1263-64. The court noted that the first suit against a defendant or group of defendants could be dispositive of all remaining suits and would decide the rights of absent defendants “without the class action’s assurance that they be adequately represented.” *Id.* At 1264. The court reasoned that, as here, a defendant “has only a small number of possible individual defenses” and “the primary legal and factual issues in the first case would not only form the basis for the application of stare decisis in subsequent cases; they would almost inevitably prove dispositive in those cases.” *Id.*

20. A Defendant Class action certified under Rule 23(b)(1) is fair to the Defendants, particularly relatively small Net Winners. The efficiency of one action in which all parties can argue their case and assert their rights will benefit both TelexFree and small winners and supports the intent behind both Rule 23(b)(1)(A) and (b)(1)(B). While the Court is mindful of due process concerns as well as other problems specific to Defendant Class actions, the Court finds a class action is the only means to reasonably and efficiently resolve the Trustee’s claims against 80,000 Net Winners.

21. Accordingly, the Court makes the following express rulings and findings:

A. The proposed class of defendants (the “Class”) is so numerous and geographically dispersed that joinder of all members is impracticable;

B. There are questions of law and fact common to all class members including that the common claims, issues, defenses of the Class include but are not limited to: (i) what transfers should be included in the determination of a Net Winner; (ii) whether Net Winners should be determined by an aggregation of Related User Accounts; (iii) whether the initial methodology for

determining Related User Account is reasonable; (iv) whether the information maintained on the Debtors' SIG records with respect to each Participant transactions with the Debtor and other Participants is reasonably reliable; (v) whether the Net Winner Payments are avoidable as fraudulent transfers because the Debtors had the actual intent to hinder, delay, or defraud creditors; (vi) whether the Net Winner Payments are avoidable as fraudulent transfers because the transfers were made for less than fair consideration while the Debtors were insolvent, undercapitalized, or unable to pay debts as they became due; (vii) whether the Net Preference Payments may be recovered as preferential transfers; (viii) whether the Court's finding that the Debtors engaged in a Ponzi and pyramid scheme may be applied, along with any applicable presumptions, in determining the Trustee's claims.

C. The defenses of the putative Class Representatives are typical of the defenses of the Class;

D. Marco Puzzarini and Sandro Paulo Freitas as the Class Representatives will fairly and adequately represent the interests of the Class;

E. The prosecution of separate actions by or against individual members of the Class would create the risk that adjudications with respect to individual members of the class would as a practical matter be dispositive of the interests of the other members not parties to the adjudications, or may be inconsistent or varying, or substantially impair or impede the ability of Class members to protect their interests;

F. The questions of law and fact common to the members of the Class predominate over any questions affecting only individual members, and a class action is superior to other methods for fair and efficient adjudication of the controversy;

THEREFORE, IT IS HEREBY ORDERED THAT:

1. The proposed class action complaint satisfies the requirements of Fed. R. Civ. P. 23(a) and (b) as adopted by Fed. R. Bankr. P. 7023 and the Motion is granted, except as inconsistent with the terms of this Order.

2. The Court certifies a Class of all persons who reside outside of the United States, purchased at least one membership plan (“Plan”) or voice over internet (“VoIP”) package from one or more of the Debtors (“a Participant”), and satisfy one or both of the following criteria:

- (i) Is alleged to be a “Net Winner,” that is, a Participant who is alleged to have received more from the Debtors and from other persons in connection with the purchase of Plans or VoIP packages than such Participant paid to the Debtors or to other persons in connection with the purchase of Plans or VoIP packages, as determined based upon an aggregation of all activity in the User Accounts of a Participant (“Related User Accounts”);
- (ii) Is alleged to be a Net Winner as defined in section (i) above who also is alleged to have been a Net Winner with respect to transactions occurring in the 90 days prior to the bankruptcy filings.

3. The Class is certified under Fed. R. Civ. P. 23(a) and 23(b)(1). Accordingly, no member of the Class shall be permitted to opt out of the class, and each and every member of the class shall be bound by all orders or judgments of this Court in this adversary proceeding. At any time during the proceedings, the Court may, upon motion or *sua sponte*, exercise its discretion under Fed. R. Civ. P. 23(c) and (d) to create sub-classes, remove or replace the Class Representatives, or otherwise condition the conduct of this adversary proceeding in order to fairly and adequately protect the rights of the Class members.

4. Marco Puzzarini and Sandro Paulo Freitas are appointed as the Class Representatives.

5. The Class Representatives have agreed to have MRDK to serve as class counsel. The Court has reviewed the Affidavit submitted by Attorney Rona as to his qualifications to serve as class counsel and finds him and his law firm MRDK qualified.

6. MRDK is hereby appointed Class Counsel for the Net Winner Class and shall serve until further order of the Court. Notice of the certification of the Net Winner Class and the appointment of MRDK as Class Counsel shall be sent to the members of the Class by the Trustee.

7. The Trustee is authorized to utilize estate funds in an aggregate amount not to exceed One Hundred Sixty Five Thousand Dollars (\$165,000) to pay Class Counsel for legal fees and cost incurred by Class Representatives provided that (i) Class Counsel submit a fee application that satisfies the requirement of the Bankruptcy Code, Federal Rules of Bankruptcy Procedure and the Massachusetts Local Bankruptcy Rules (MLBR), including without limitation MLBR2016-1 and applicable case law in this district and (ii) any payment shall be authorized by this Court upon notice and after all interested parties have an opportunity to be heard.

8. The Trustee is authorized to utilize estate funds in an aggregate amount not to exceed Sixty Thousand Dollars (\$60,000) to pay fees and cost incurred by Class Representatives for their Expert to assist Class Counsel in representation of the Class provided that (i) the Expert submit a fee application that satisfies the requirement of the Bankruptcy Code, Federal Rules of Bankruptcy Procedure and the MLBR, including without limitation MLBR2016-1 and applicable case law in this district and (ii) any payment shall be authorized by this Court upon notice and after all interest parties have an opportunity to be heard.

9. MRDK is authorized to communicate with the Net Winner Class as MRDK deems reasonable and necessary through such means that MRDK believes to be most efficient and cost-effective. The Trustee will provide to MRDK contact information, primarily email addresses, to facilitate MRDK's communications with the members of the Net Winner Class and the Trustee will assist the Class representatives in sending Notices to the Class members.

10. MRDK is authorized and instructed to explain to the Net Winner Class that in the event that liability on one or more of the Trustee's claims is established, the Trustee intends to seek a process to determine the net winnings of each Net Winner Class member. Therefore, it is not necessary for any net winner to communicate with MRDK related to determining the amount of his or her net winnings because each member of the Class will have an opportunity to address those issues in the damages process ordered by the Court.

11. MRDK is authorized and instructed to inform the members of the Net Winner Class that, if they have not already done so, to gather and preserve any documents or information (including electronic files) related to the amount each paid into and received from TelexFree so those documents and that information can be used subsequently to determine the amount of each defendant's net winnings, if any.

12. MRDK is hereby appointed to serve without bond and shall have full power and authority to act in the best interests of the Net Winner Class. MRDK and its agents, acting within the scope of MRDK's duties, are entitled to rely on all outstanding rules of law and Orders of this Court and shall not be liable to anyone for their own good faith compliance with any order, rule, law, judgment, or decree. In no event shall MRDK be liable to anyone for its good faith compliance with its duties and responsibilities as Class Counsel, nor shall MRDK be liable to anyone for any actions taken or omitted except upon a finding by this Court that it acted

or failed to act as a result of malfeasance, bad faith, gross negligence, or in reckless disregard of its duties.

13. This Court shall retain jurisdiction over any action filed against MRDK based upon acts or omissions committed in MRDK's representative capacity.

14. In the event MRDK decides to resign, it shall first give written notice to the Court of MRDK's intention, and the resignation shall not be effective until the Court appoints a successor.

15. The Trustee has expressed a willingness to consider voluntary settlements on the Trustee's claims with TelexFree's Net Winners and others against whom the Trustee has claims. Accordingly, members of the Net Winner Class and the Trustee are permitted to discuss a potential settlement of the Trustee's claims against them even though they have become members of the Net Winner Class.

16. The Trustee is instructed to post, in English, Spanish, and Portuguese, a copy of this order on the Claims and Noticing Agent's website and to send a copy to all potential Net Winners. Any member of the Net Winner Class or other interested person who objects to this order must file such objection within 30 days of the date of its entry. The Court finds that there is no just cause to delay the implementation of the agreement reflected in this order pending the objection period, but may revise or terminate this order after review of any objections filed. However, any fees incurred by MRDK prior to modification of this order shall be paid in accordance with the order.

Dated at Boston this 3rd day of August, 2017.



Hon. Melvin S. Hoffman
Chief United States Bankruptcy Judge

730635

EXHIBIT C

EXHIBIT C

<i>Puzzarini & Freitas Matter</i> Includes Time Entries Solely Attributable to International Class, as Well as Time Entries 50% Attributable to International Class (5/1/2018 to 7/15/2020)				
<u>NAME (Time Period)</u>	<u>INITIALS</u>	<u>RATE</u>	<u>HOURS</u>	<u>FEE</u>
Ilyas J. Rona (5/1/2018 - 7/15/2020)	IJR	\$375/hour	33.6	\$12,600.00
Leonard E. Milligan (5/1/2018 - 7/15/2020)	LEM	\$350/hour	0.8	\$280.00
Michael J. Duran (5/1/2018 - 7/15/2020)	MJD	\$300/hour	32.6	\$9,780.00
Jin-Ho King (5/1/2018 - 6/7/15/2020)	JHK	\$300/hour	23.8	\$7,140.00
Gregory N. Corbin* (5/1/2018 - 10/31/2019)	GNC	\$275/hour	55.8	\$15,345.00
Kasey A. Emmons (5/1/2018 - 7/15/2020)	KAE	\$225/hour	0.1	\$22.50
Sub-Total:			146.7	\$45,167.50

* No longer with the firm.

EXHIBIT D

EXHIBIT D

<i>Balan Time Entries</i> Includes Time Entries Solely Attributable to Domestic Class, as Well as Time Entries 50% Attributable to Domestic Class (5/1/2018 to 7/15/2020)				
<u>NAME (Time Period)</u>	<u>INITIALS</u>	<u>RATE</u>	<u>HOURS</u>	<u>FEE</u>
Ilyas J. Rona (5/1/2018 - 7/15/2020)	IJR	\$375/hour	25.4	\$9,525.00
Leonard E. Milligan (5/1/2018 - 7/15/2020)	LEM	\$350/hour	0.8	\$280.00
Michael J. Duran (5/1/2018 - 7/15/2020)	MJD	\$300/hour	31.7	\$9,510.00
Jin-Ho King (5/1/2018 - 6/7/15/2020)	JHK	\$300/hour	24.0	\$7,200.00
Gregory N. Corbin* (5/1/2018 - 10/31/2019)	GNC	\$275/hour	55.0	\$15,125.00
Kasey A. Emmons (5/1/2018 - 7/15/2020)	KAE	\$225/hour	0.1	\$22.50
Sub-Total:			137.0	\$41,662.50

* No longer with the firm.

EXHIBIT E

EXHIBIT E

ATTORNEY FEES - GRAND TOTAL				
<u>NAME</u>	<u>INITIALS</u>	<u>RATE</u>	<u>HOURS</u>	<u>FEE</u>
Ilyas J. Rona	IJR	\$375	59.0	\$22,125.00
Leonard E. Milligan	LEM	\$350	1.6	\$560.00
Michael J. Duran	MJD	\$300	64.3	\$19,290.00
Jin-Ho King	JHK	\$300	47.8	\$14,340.00
Gregory N. Corbin*	GNC	\$275	110.8	\$30,470.00
Kasey A. Emmons	KAE	\$225	0.2	\$45.00
Grand Totals:			283.7	\$86,830.00

* No longer with the firm.

EXHIBIT F

EXHIBIT F

<i>PUZZARINI & FREITAS EXPENSES</i> (5/1/2018 to 7/15/2020)			
<u>DATE</u>	<u>UTBMS EXPENSE CODE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
6/30/18	E106 Online research	PACER 2018 Q2 fees	\$33.00
Sub-total			\$33.00

EXHIBIT G

EXHIBIT G

BALAN EXPENSES (8/1/2017 to 7/15/2020)			
<u>DATE</u>	<u>UTBMS EXPENSE CODE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
12/31/17	E106 Online research	Q4 PACER research	\$10.10
3/31/18	E106 Online research	Q1 PACER research	\$9.80
4/27/18	E123 Other professionals	Ayvazian invoice MSC 18-0328 for Portuguese translation	\$246.00
5/1/18	E124 Other	DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	\$5.05
6/1/18	E124 Other	DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	\$5.05
6/30/18	E106 Online research	Q2 PACER research	\$7.60
7/1/18	E124 Other	DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	\$5.05
8/1/18	E124 Other	DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	\$5.05
9/1/18	E124 Other	DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	\$5.05
9/30/18	E106 Online research	Q3 PACER research	\$49.20
10/1/18	E124 Other	DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	\$5.05
11/1/18	E124 Other	DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	\$5.05
12/1/18	E124 Other	DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	\$5.05
12/18/18	E125 Translation	Translate email and FAQs to Spanish	\$118.00
12/18/18	E125 Translation	Translate email and FAQs to Portuguese.	\$118.00
1/1/19	E124 Other	DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	\$5.05
1/1/19	E106 Online research	LexisNexis research charges 2017Q3 through 2018Q4	\$183.09
1/3/19	E124 Other	Amazon Web Services, Inc. invoice 164677744 batch email sending through SES	\$20.83
6/1/20	E106 Online research	Westlaw research charges for May 2020	\$29.71
Sub-total			\$839.28

EXHIBIT H

EXHIBIT H

EXPENSES - GRAND TOTAL	
<i>Puzzarini & Freitas</i> Matter	\$33.00
<i>Balan</i> Matter	\$839.28
Grand Total	\$872.28

EXHIBIT I

**MILLIGAN RONA
DURAN & KING**

A PROFESSIONAL LIMITED LIABILITY COMPANY

INVOICEInvoice # 1703
Date: 07/16/2020
Due On: 08/15/2020**Milligan Rona Duran & King LLC**50 Congress Street, Suite 600
Boston, MA 02109-4075
United States
Phone: 617-395-9570

Marco Puzzarini, Sandro Paulo Freitas

01200-Puzzarini**TelexFREE International Defendant Class Representation****Services**

Date	Attorney	Description	Quantity	Rate	Total
05/01/2018	Ilyas Rona	A105 Communicate (in firm) B160 Fee/Employment Applications: Discussed service issues re MJD re application of fees[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
05/01/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: update telexfreelawsuit.com to show second interim fee application and notice of hearing[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
05/14/2018	Ilyas Rona	A101 Plan and prepare for L120 Analysis/Strategy: Prepared for conference call with Sandro Freitas re defense strategy, including troubleshooting video conference system to be used	0.80	\$375.00	\$300.00
05/14/2018	Ilyas Rona	A106 Communicate (with client) L120 Analysis/Strategy: Video conference with Sandro Freitas, Sara Teixeira re formulating defense strategy	3.80	\$375.00	\$1,425.00
05/21/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: update DMARC policy to reject failing emails in response to DMARC report of possibly fraudulent email[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00

05/25/2018	Michael Duran	A105 Communicate (in firm) L110 Fact Investigation/ Development: Conference call with LEM re: status of this case. [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
05/25/2018	Leonard Milligan	A105 Communicate (in firm) L110 Fact Investigation/ Development: Conference call with MJD re case status[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$350.00	\$35.00
06/18/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: discuss w/ IJR re: summary judgment and settlement strategy [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
06/18/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: discuss w/ JHK re: summary judgment and settlement strategy [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
06/20/2018	Jin-Ho King	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration: speak w/ caller who identified self as son of a Dominican recipient of our emails and explain process to him	0.30	\$300.00	\$90.00
06/20/2018	Kasey Emmons	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss settlement proposal ideas with IJR, MJD, and GNC. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$225.00	\$22.50
06/20/2018	Gregory Corbin	PC with IJR, MJD, and KAE about bigger picture of potentially resolving matter and what next steps are needed to lead to that point.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
06/20/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with MJD, GNC, and KAE to discuss action items[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
06/20/2018	Michael Duran	PC with IJR, GNC, and KAE re: resolution and litigation strategy.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
07/05/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss defense strategy based on employment law with IJR.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
07/05/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: PC with GNC re wage act[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50

07/12/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with MJD discussing strategy for settlement and for summary judgment. Discuss factual issues v. legal issues.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
07/12/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: PC with GNC discussing strategy for settlement and for summary judgment. Discuss factual issues v. legal issues. [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
08/02/2018	Michael Duran	Conference call with IJR re: next steps and discuss settlement strategy [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
08/02/2018	Ilyas Rona	Conference call with mjd re: next steps and discuss settlement strategy[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
08/06/2018	Gregory Corbin	A106 Communicate (with client) L120 Analysis/Strategy: PC from class members re: email issues.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
08/06/2018	Gregory Corbin	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: PC w/ IJR discussing potential settlement strategy.[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$275.00	\$110.00
08/06/2018	Ilyas Rona	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Phone conference with GNC discussing potential settlement strategy [Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$375.00	\$150.00
08/07/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with GNC re: settlement strategy.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
08/07/2018	Gregory Corbin	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Strategize with MJD about obtaining resolution. Review potential areas for research to resolve matters.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
08/07/2018	Gregory Corbin	A102 Research L440 Other Trial Preparation and Support: Research ethical issues in representing class through settlement.[Total time entry of 2.0 h split between Domestic and International Classes]	1.00	\$275.00	\$275.00
08/07/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: discuss settlement issues w/ GNC [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
08/07/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC	0.20	\$275.00	\$55.00

		with JHK re settlement issue[Total time entry of 0.4 h split between Domestic and International Classes]			
08/08/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with IJR discussing research/strategy re: next steps in litigation and setting up for steps after that.[Total time entry of 1 h split between Domestic and International Classes]	0.50	\$275.00	\$137.50
08/08/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: PC with GNC re: research strategy[Total time entry of 1 h split between Domestic and International Classes]	0.50	\$375.00	\$187.50
08/08/2018	Gregory Corbin	A102 Research L110 Fact Investigation/Development: Continue review of accounts, credit transactions, triangular transactions, unraveling for potential settlement. [Total time entry of 2.8 h split between Domestic and International Classes]	1.40	\$275.00	\$385.00
08/13/2018	Gregory Corbin	A105 Communicate (in firm) L310 Written Discovery: PC with IJR re: determining which class members could be an example of issues. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
08/13/2018	Gregory Corbin	A104 Review/analyze L390 Other Discovery: Review American Greed Episode re: telex free for additional information to use in defense. [Total time entry of .8 h split between Domestic and International Classes]	0.40	\$275.00	\$110.00
08/13/2018	Ilyas Rona	A105 Communicate (in firm) L310 Written Discovery: Phone call with GNC re: developing case studies for use in summary judgment [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
08/27/2018	Jin-Ho King	A104 Review/analyze L110 Fact Investigation/ Development: confirm whether individual who claims to have received settlement offer from Trustee is a member of the defense class[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
09/07/2018	Gregory Corbin	A104 Review/analyze L210 Pleadings: Review case documents for summary judgment issues.[Total time entry of 2.2 h split between Domestic and International Classes]	1.10	\$275.00	\$302.50
09/12/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: discuss matter strategy and review dockets w/ MJD. [Total time entry of 1 h split between Domestic and International Classes]	0.50	\$300.00	\$150.00
09/12/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Review Dockets with JHK re: next steps. [Total time entry of 1 h split between Domestic and International Classes]	0.50	\$300.00	\$150.00
09/12/2018	Jin-Ho King	A104 Review/analyze L110 Fact Investigation/ Development: review dockets re: case updates. [Total	0.90	\$300.00	\$270.00

		time entry of 1.8 h split between Domestic and International Classes]			
09/12/2018	Jin-Ho King	A103 Draft/revise L120 Analysis/Strategy: outline draft communication to class members[Total time entry of .8 h split between Domestic and International Classes]	0.40	\$300.00	\$120.00
09/13/2018	Michael Duran	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration: Conference with Greg re: task assignment. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
09/13/2018	Gregory Corbin	A104 Review/analyze L250 Other Written Motions and Submissions: REview claims procedures for potential use in future settlement/resolution.[Total time entry of 1 h split between Domestic and International Classes]	0.50	\$275.00	\$137.50
09/13/2018	Gregory Corbin	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration: PC w MJD re assignment related to claims procedures[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
09/17/2018	Gregory Corbin	A102 Research L250 Other Written Motions and Submissions: Review pleadings and research other ponzi/pyramid scheme cases to determine potential avenues for resolution.[Total time entry of 3.4 h split between Domestic and International Classes]	1.70	\$275.00	\$467.50
09/18/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Research SJ issues to defend against.[Total time entry of 3.4 h split between Domestic and International Classes]	1.70	\$275.00	\$467.50
09/18/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: Strategy discussion with IJR on motion for summary judgment issues after review of relevant case law on "Ponzi presumption" and actual intent v. constructive fraud. Discuss settlement potentials, wage act claims.[Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$275.00	\$220.00
09/18/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss with GNC Strategy for MSJ and for reaching settlement. Discuss defenses and defeating actual and constructive fraud.[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$375.00	\$225.00
09/19/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: continue legal research for MSJ motion prep. [Total time entry of 2.7 h rounded down to 2.6 h and split between Domestic and International Classes]	1.30	\$275.00	\$357.50
09/20/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Research for SJ motion on Ponzi presumption. [Total time entry of .7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$275.00	\$82.50

09/20/2018	Jin-Ho King	A104 Review/analyze L190 Other Case Assessment, Development and Administration: review communications from TelexFree participants re: possible response[Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$300.00	\$90.00
09/21/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Research law for SJ motions. [Total time entry of 3.1 h rounded down to 3.0 h and split between Domestic and International Classes]	1.50	\$275.00	\$412.50
09/21/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with JHK re: strategy and next steps.[Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$300.00	\$90.00
09/21/2018	Jin-Ho King	A104 Review/analyze L120 Analysis/Strategy: review claims processes for purpose of preparing communication to class members[Total time entry of 3.5 h rounded down to 3.4 h and split between Domestic and International Classes]	1.70	\$300.00	\$510.00
09/21/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with MJD re: strategy and next steps.[Total time entry of 0.7h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$300.00	\$90.00
09/21/2018	Michael Duran	Further discussion with JHK re: claims process[Total time entry of 0.5h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
09/24/2018	Gregory Corbin	Compile MSJ research and facts [Total time entry of 2.6 h split between Domestic and International Classes]	1.30	\$275.00	\$357.50
09/24/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: discuss division of tasks between GNC and JHK [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
09/24/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC w/ JHK re division of tasks[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
09/24/2018	Jin-Ho King	A103 Draft/revise L190 Other Case Assessment, Development and Administration: draft communication with defense class members [Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$300.00	\$240.00
09/25/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Continue research on wage act and Ponzi schemes for MSJ. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
09/26/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Review and update research on wage defense. [Total time entry of	1.30	\$275.00	\$357.50

2.6 h split between Domestic and International Classes]					
09/26/2018	Jin-Ho King	A103 Draft/revise L190 Other Case Assessment, Development and Administration: prepare information for defense class members [Total time entry of 3.5 h rounded down to 3.4 h and split between Domestic and International Classes]	1.70	\$300.00	\$510.00
09/27/2018	Jin-Ho King	A103 Draft/revise L190 Other Case Assessment, Development and Administration: continue working on informational presentation for defense class members [Total time entry of 2.7h rounded down to 2.6 h and split between Domestic and International Classes]	1.30	\$300.00	\$390.00
09/27/2018	Gregory Corbin	Work on Summary judgment [Total time entry of 0.5h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$275.00	\$55.00
09/28/2018	Gregory Corbin	A102 Research L110 Fact Investigation/Development: Review documents for factual support in MSJ.[Total time entry of 2.5 h rounded down to 2.4 h and split between Domestic and International Classes]	1.20	\$275.00	\$330.00
09/28/2018	Jin-Ho King	A103 Draft/revise L190 Other Case Assessment, Development and Administration: receive feedback on presentation and modify presentation based on the feedback [Total time entry of 4.5 h rounded down to 4.4 h and split between Domestic and International Classes]	2.20	\$300.00	\$660.00
09/28/2018	Gregory Corbin	A105 Communicate (in firm) L240 Dispositive Motions: PC with IJR re: summary judgment thoughts[Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$275.00	\$82.50
09/28/2018	Ilyas Rona	A105 Communicate (in firm) L240 Dispositive Motions: Summary judgment conference with GNC [Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$375.00	\$112.50
10/01/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: speak w/ MJD re: preparing information for class members[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
10/01/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with JHK re: communications to class members.[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
10/02/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Research: motion for Summary Judgment defenses and elements. Incorporate into the memorandum. [Total time entry of 3.6 h split between Domestic and International Classes]	1.80	\$275.00	\$495.00

10/10/2018	Jin-Ho King	A103 Draft/revise L190 Other Case Assessment, Development and Administration: outline additional presentation frames[Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$300.00	\$240.00
10/16/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with JHK re: emails from class members.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
10/16/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: PC with MJD re class communications.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
10/29/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with IJR to discuss strategy re: settlement [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
10/29/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with MJD to discuss strategy re: settlement [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$375.00	\$75.00
11/05/2018	Jin-Ho King	A103 Draft/revise L120 Analysis/Strategy: review notes on updating client communication[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
11/07/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with MJD re: upcoming strategy for call with class members given email from opposing counsel.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
11/07/2018	Gregory Corbin	A106 Communicate (with client) L120 Analysis/Strategy: Discuss potential avenues for a global resolution w class member MJD and IJR [Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$275.00	\$220.00
11/07/2018	Ilyas Rona	A106 Communicate (with client) L120 Analysis/Strategy: Conference call with class members MJD, and GNC re strategy to resolve class cases in light of trustee communication[Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$375.00	\$300.00
11/07/2018	Michael Duran	A106 Communicate (with client) L120 Analysis/Strategy: PC with class members and GNC and IJR. [Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$300.00	\$240.00
11/07/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with GNC re: strategy for next call with class members[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
11/08/2018	Gregory Corbin	A105 Communicate (in firm) L160 Settlement/Non-	0.20	\$275.00	\$55.00

		Binding ADR: Brainstorm potential settlement mechanics with IJR given duties to the two defense classes. [Total time entry of 0.4 h split between Domestic and International Classes]			
11/08/2018	Ilyas Rona	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Phone conference with GNC re potential settlement mechanics [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
11/08/2018	Michael Duran	A104 Review/analyze L160 Settlement/Non-Binding ADR: Brief initial review of Trustee's settlement proposal. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
11/08/2018	Michael Duran	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Conference call about settlement possibilities post our call with class members w GNC and IJR. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
11/08/2018	Ilyas Rona	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Conference call w GNC and MJD re client call and resolution potential[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
11/08/2018	Gregory Corbin	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: PC with MJD&IJR re: pc with class members and resolving cases.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
11/09/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with Len re: various settlement proposals. [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
11/09/2018	Leonard Milligan	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with MJD re: various settlement proposals.[Total time entry of 0.5h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$350.00	\$70.00
11/09/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss settlement ideas for class with GNC.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
11/09/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with MJD re: obtaining a resolution for clients. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
11/13/2018	Gregory Corbin	A106 Communicate (with client) L120 Analysis/Strategy: PC with class member re: status and expect email. [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50

11/13/2018	Gregory Corbin	A102 Research L340 Expert Discovery: Prepare for dispute on expert witnesses and methods.[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$275.00	\$165.00
11/13/2018	Gregory Corbin	A105 Communicate (in firm) L130 Experts/Consultants: Discuss w IJR expert report and questions to pose to Trustee's expert[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
11/13/2018	Ilyas Rona	A105 Communicate (in firm) L130 Experts/Consultants: PC with GNC re: expert information and issues with Huron analysis.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
11/27/2018	Gregory Corbin	A104 Review/analyze L210 Pleadings: Review 79 pleadings re: claim allowances and disallowances. [Total time entry of 1.4 h split between Domestic and International Classes]	0.70	\$275.00	\$192.50
11/27/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss settlement strategies and potential for resolution, given the size of classes. Discuss claims allowances with IJR [Total time entry of 1.1 h rounded down to 1.0 h and split between Domestic and International Classes]	0.50	\$275.00	\$137.50
11/27/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss w/ gnc settlement strategies claims allowances. [Total time entry of 1.1 h rounded down to 1.0 h and split between Domestic and International Classes]	0.50	\$375.00	\$187.50
11/28/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss with MJD draft emails with clients re: status of case. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
11/28/2018	Michael Duran	A105 Communicate (in firm) L110 Fact Investigation/ Development: Conference with Greg re: class communications. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
11/28/2018	Gregory Corbin	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Draft email to class regarding outstanding issues. [Total time entry of 3.9 h rounded down to 3.8 h and split between Domestic and International Classes]	1.90	\$275.00	\$522.50
11/29/2018	Gregory Corbin	A103 Draft/revise L120 Analysis/Strategy: revise communication with clients. [Total time entry of 2.8 h split between Domestic and International Classes]	1.40	\$275.00	\$385.00
11/29/2018	Jin-Ho King	A104 Review/analyze L120 Analysis/Strategy: review class communication draft by GNC [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
11/29/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC	0.10	\$275.00	\$27.50

		with JHK re: website FAQs and class communication. [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]			
11/29/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: discuss next steps in class communication[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
11/29/2018	Jin-Ho King	A103 Draft/revise L120 Analysis/Strategy: review updated version of FAQ from GNC and propose changes [Total time entry of 0.8h split between Domestic and International Classes]	0.40	\$300.00	\$120.00
11/30/2018	Gregory Corbin	A103 Draft/revise L120 Analysis/Strategy: Review/revise FAQs and email. [Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$275.00	\$82.50
11/30/2018	Jin-Ho King	A103 Draft/revise L120 Analysis/Strategy: implement additional edits, review edits from GNC, and finalize version of FAQ and email for in-firm review [Total time entry of 3.8 h split between Domestic and International Classes]	1.90	\$300.00	\$570.00
11/30/2018	Gregory Corbin	A103 Draft/revise L120 Analysis/Strategy: Revise FAQs and email. [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/03/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC w IJR re: email and strategy for resolution[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/03/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with GNC re resolution strategy and email with clients.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
12/04/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with MJD re: email and FAQs[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/04/2018	Gregory Corbin	A103 Draft/revise L120 Analysis/Strategy: Revise FAQs and Email[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/05/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Research SJ motions in defendant class and Ponzi scheme cases. [Total time entry of 1.1 h rounded down to 1 h and split between Domestic and International Classes]	0.50	\$275.00	\$137.50
12/06/2018	Gregory Corbin	A103 Draft/revise L190 Other Case Assessment,	0.70	\$275.00	\$192.50

		Development and Administration: Review communications to ensure compliance with court's orders. Review for scope. Revise to comport.[Total time entry of 1.5 h rounded down to 1.4 h and split between Domestic and International Classes]			
12/06/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC w MJD re: scope of representation and limitation in email/ FAQs page. Process going forward.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/06/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with GNC re: email notice. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
12/06/2018	Michael Duran	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Drafting of FAQs. [Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$300.00	\$240.00
12/07/2018	Michael Duran	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Drafting work on email to class members. [Total time entry of 1.4 h split between Domestic and International Classes]	0.70	\$300.00	\$210.00
12/07/2018	Michael Duran	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Drafting work on Frequently Asked Questions.[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$300.00	\$180.00
12/07/2018	Gregory Corbin	A102 Research L160 Settlement/Non-Binding ADR: Review other MLM/Ponzi/Pyramid scheme cases and use to begin drafting proposal for settlement. [Total time entry of 1.1 h rounded down to 1.0 h and split between Domestic and International Classes]	0.50	\$275.00	\$137.50
12/10/2018	Gregory Corbin	A103 Draft/revise L160 Settlement/Non-Binding ADR: Organize thoughts and discussions re: settlement proposal terms. Begin drafting offer sheet. [Total time entry of 1.4 h split between Domestic and International Classes]	0.70	\$275.00	\$192.50
12/10/2018	Ilyas Rona	A108 Communicate (other external) L120 Analysis/Strategy: Spoke with Charles Bennett and Andrew Lizotte about possible class wide resolution mechanics [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$375.00	\$75.00
12/11/2018	Leonard Milligan	A105 Communicate (in firm) L120 Analysis/Strategy: team meeting re: settlement proposals; mechanisms and theory [Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$350.00	\$140.00
12/11/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Team meeting with IJR and LEM re: possible settlement	0.40	\$300.00	\$120.00

		proposals.[Total time entry of 0.8 h split between Domestic and International Classes]			
12/11/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with IJR re: settlement portal. [Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$300.00	\$90.00
12/11/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with MJD re: settlement portal. Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$375.00	\$112.50
12/11/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Meeting w MJD & LEM re possible settlement proposals. [Total time entry of 0.8 split between Domestic and International Classes]	0.40	\$375.00	\$150.00
12/12/2018	Gregory Corbin	A104 Review/analyze L110 Fact Investigation/ Development: Review data from Trustee to determine potential resolution offer.[Total time entry of 4.2 h split between Domestic and International Classes]	2.10	\$275.00	\$577.50
12/12/2018	Michael Duran	A108 Communicate (other external) L160 Settlement/ Non-Binding ADR: Conference call with IJR and Trustee's counsel re: potential global resolution. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
12/12/2018	Ilyas Rona	A101 Plan and prepare for L120 Analysis/Strategy: Prepare for call with Trustee's Counsel with MJD. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
12/12/2018	Ilyas Rona	A101 Plan and prepare for L120 Analysis/Strategy: Prepare for call with Trustee's Counsel with MJD. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
12/12/2018	Michael Duran	A101 Plan and prepare for L120 Analysis/Strategy: Prepare for call with Trustee's Counsel with IJR. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
12/12/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss written settlement proposal with IJR and GNC.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
12/12/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with IJR and MJD re settlement proposal[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/12/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: PC with MJD and GNC re: settlement[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50

12/13/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with IJR re: settlement prospects [Total time entry of 1.5 h rounded down to 1.4 h and split between Domestic and International Classes]	0.70	\$275.00	\$192.50
12/13/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Phone call with GNC to discuss preparing draft response to Trustee's settlement proposal term sheet [Total time entry of 1.5 h rounded down to 1.4 h and split between Domestic and International Classes]	0.70	\$375.00	\$262.50
12/13/2018	Gregory Corbin	A104 Review/analyze L120 Analysis/Strategy: Review data and amend/revise term sheet. (Includes 1 hour call with MJD) [Total time entry of 3.6 h split between Domestic and International Classes]	1.80	\$275.00	\$495.00
12/13/2018	Michael Duran	A104 Review/analyze L120 Analysis/Strategy: Review spreadsheet created by GNC with GNC to help evaluate settlement potential. [Total time entry of 1 h split between Domestic and International Classes]	0.50	\$300.00	\$150.00
12/13/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: update website [Total time entry of 4.8 h split between Domestic and International Classes]	2.40	\$300.00	\$720.00
12/13/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss GNC's spreadsheet. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
12/14/2018	Gregory Corbin	A103 Draft/revise L250 Other Written Motions and Submissions: Review research on and draft potential structures for offer of settlement. [Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$275.00	\$165.00
12/14/2018	Gregory Corbin	A103 Draft/revise L120 Analysis/Strategy: Revise FAQ and Email and prepare formatting for email/website. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
12/14/2018	Michael Duran	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Drafting changes to FAQs. [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
12/17/2018	Gregory Corbin	A103 Draft/revise L240 Dispositive Motions: review data for dispositive motion arguments. Prepare for expert.[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$275.00	\$110.00
12/17/2018	Gregory Corbin	A106 Communicate (with client) L120 Analysis/Strategy: finalize Email update and prepare for translation.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/17/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Review data. continue looking for more info to support potential	0.30	\$275.00	\$82.50

		MSJ theories. [Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]			
12/20/2018	Gregory Corbin	A104 Review/analyze L210 Pleadings: Review recent filings; [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$275.00	\$55.00
12/20/2018	Gregory Corbin	A103 Draft/revise L120 Analysis/Strategy: Review class communications; prepare. [Total time entry of 1 h split between Domestic and International Classes]	0.50	\$275.00	\$137.50
12/20/2018	Jin-Ho King	A103 Draft/revise L140 Document/File Management: update website with translations communications [Total time entry of 1.8h split between Domestic and International Classes]	0.90	\$300.00	\$270.00
12/20/2018	Gregory Corbin	A104 Review/analyze L110 Fact Investigation/Development: Continue review of data for potential resolution. [Total time entry of 1.5 h rounded down to 1.4 and split between Domestic and International Classes]	0.70	\$275.00	\$192.50
12/20/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: initiate sending of email notice to class members and update sending script [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
12/21/2018	Gregory Corbin	A104 Review/analyze L120 Analysis/Strategy: Review claims responses filed. [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$275.00	\$55.00
12/21/2018	Gregory Corbin	A107 Communicate (other outside counsel) L160 Settlement/Non-Binding ADR: PC meeting with Stoneturn experts re: understanding data for resolution. [Total time entry of 1.7 h rounded down to 1.6 h and split between Domestic and International Classes]	0.80	\$275.00	\$220.00
12/21/2018	Michael Duran	A107 Communicate (other outside counsel) L160 Settlement/Non-Binding ADR: Meet in person with Stoneturn experts re: understanding data for resolution. Call to GNC during this meeting. [Total time entry of 1.7 h rounded down to 1.6 h and split between Domestic and International Classes]	0.80	\$300.00	\$240.00
12/21/2018	Ilyas Rona	A107 Communicate (other outside counsel) L160 Settlement/Non-Binding ADR: Meeting with Stoneturn re: data analysis. w. MJD and GNC (by phone). Total time entry of 1.7 h rounded down to 1.6 h and split between Domestic and International Classes]	0.80	\$375.00	\$300.00
12/24/2018	Jin-Ho King	A108 Communicate (other external) L110 Fact Investigation/Development: speak w/ potential class member. [Total time entry of 1.1 h rounded down to 1 h	0.50	\$300.00	\$150.00

and split between Domestic and International Classes]					
12/24/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: monitor class email sending and updated script; [Total time entry of .6 h split between Domestic and International Classes]	0.30	\$300.00	\$90.00
12/26/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: Sending thousands of class member emails, including creating updated Ruby version to utilize AWS SDK.[Total time entry of 3.5 h rounded down to 3.4 h and split between Domestic and International Classes]	1.70	\$300.00	\$510.00
12/26/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: review email responses, including any complaints and permanent bounces, from email sending and generate updated lists. [Total time entry of 3.4 h split between Domestic and International Classes]	1.70	\$300.00	\$510.00
01/02/2019	Gregory Corbin	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration: Review emails from class members[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
01/08/2019	Ilyas Rona	A108 Communicate (other external) L120 Analysis/Strategy: Joined outside conference in progress at Stoneturn with JD, (and RD, MJD and GNC by phone) to discuss strategy for teeing up possible resolution[Total time entry of 1.4 h split between Domestic and International Classes]	0.70	\$375.00	\$262.50
01/08/2019	Michael Duran	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Stoneturn re: class settlement proposal.[Total time entry of 1.5 h rounded down to 1.4 h and split between Domestic and International Classes]	0.70	\$300.00	\$210.00
01/08/2019	Gregory Corbin	A107 Communicate (other outside counsel) L130 Experts/Consultants: PC with Stoneturn re: data. Follow up download and review of additional data from Stoneturn.[Total time entry of 1.7 h rounded down to 1.6 h and split between Domestic and International Classes]	0.80	\$275.00	\$220.00
01/10/2019	Gregory Corbin	A103 Draft/revise L160 Settlement/Non-Binding ADR: Research Settlements in defendant class cases. Revise drafting response to term sheet in light of conversation with Stoneturn and research. [Total time entry of 1.8 h split between Domestic and International Classes]	0.90	\$275.00	\$247.50
01/11/2019	Gregory Corbin	A102 Research L160 Settlement/Non-Binding ADR: MSJ research to prepare for resolution request and MSJ. [Total time entry of 1.7 h rounded down to 1.6 h and split between Domestic and International Classes]	0.80	\$275.00	\$220.00
01/18/2019	Gregory Corbin	A103 Draft/revise L160 Settlement/Non-Binding ADR:	1.20	\$275.00	\$330.00

		Draft Settlement Proposal[Total time entry of 2.4 h split between Domestic and International Classes]			
01/21/2019	Gregory Corbin	A103 Draft/revise L160 Settlement/Non-Binding ADR: Review and revise draft of term sheet. [Total time entry of .8 h split between Domestic and International Classes]	0.40	\$275.00	\$110.00
01/23/2019	Gregory Corbin	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Fee Application document production.[Total time entry of .9 h rounded down to .8 h and split between Domestic and International Classes]	0.40	\$275.00	\$110.00
01/24/2019	Michael Duran	A103 Draft/revise L130 Experts/Consultants: Drafting work on settlement proposal to the Trustee.[Total time entry of 2.6 h split between Domestic and International Classes]	1.30	\$300.00	\$390.00
01/24/2019	Gregory Corbin	A103 Draft/revise L250 Other Written Motions and Submissions: Draft Fee application and review exhibits.[Total time entry of 4.3 h rounded down to 4.2 h and split between Domestic and International Classes]	2.10	\$275.00	\$577.50
01/25/2019	Gregory Corbin	A103 Draft/revise L250 Other Written Motions and Submissions: continue preparing fee application [Total time entry of 1.5 h rounded down to 1.4 h and split between Domestic and International Classes]	0.70	\$275.00	\$192.50
01/29/2019	Michael Duran	A103 Draft/revise L160 Settlement/Non-Binding ADR: Continue drafting work on Settlement proposal for the Trustee. [Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$300.00	\$240.00
01/29/2019	Michael Duran	A103 Draft/revise L160 Settlement/Non-Binding ADR: Drafting work on Settlement proposal for the Trustee. [Total time entry of 1.3 h rounded down to 1.2 h and split between Domestic and International Classes]	0.60	\$300.00	\$180.00
01/29/2019	Gregory Corbin	A103 Draft/revise L250 Other Written Motions and Submissions: Revise Fee App. Review invoices and prepare other exhibits. [Total time entry of 3.9 h rounded down to 3.8 and split between Domestic and International Classes]	1.90	\$275.00	\$522.50
01/30/2019	Gregory Corbin	A103 Draft/revise B160 Fee/Employment Applications: Revise Fee application[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$275.00	\$165.00
01/31/2019	Ilyas Rona	A103 Draft/revise B160 Fee/Employment Applications: Phone conference with GNC to discuss fee application[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
01/31/2019	Michael Duran	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: conference call with IJR re: settlement	0.10	\$300.00	\$30.00

		proposal to Trustee.[Total time entry of 0.2 h split between Domestic and International Classes]			
01/31/2019	Gregory Corbin	A103 Draft/revise B160 Fee/Employment Applications: Revise fee app. Discuss with IJR [Total time entry of .8 h split between Domestic and International Classes]	0.40	\$275.00	\$110.00
01/31/2019	Michael Duran	A104 Review/analyze L130 Experts/Consultants: Review of updated spreadsheet provided by experts.[Total time entry of 1.3 h rounded down to 1.2 h and split between Domestic and International Classes]	0.60	\$300.00	\$180.00
01/31/2019	Michael Duran	A103 Draft/revise L160 Settlement/Non-Binding ADR: Substantial drafting work on Settlement Proposal.[Total time entry of 3.2 h split between Domestic and International Classes]	1.60	\$300.00	\$480.00
02/01/2019	Ilyas Rona	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Conference call with MJD re: settlement proposal to Trustee.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
02/01/2019	Gregory Corbin	A103 Draft/revise L160 Settlement/Non-Binding ADR: Revise settlement offer. Clean up and prepare to send.[Total time entry of .9 h rounded down to 0.8 h and split between Domestic and International Classes]	0.40	\$275.00	\$110.00
02/01/2019	Ilyas Rona	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: conference call with MJD re: settlement proposal to Trustee.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
02/01/2019	Michael Duran	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: conference call with IJR re: settlement proposal to Trustee.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
02/04/2019	Ilyas Rona	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Call with MJD and joined by GNC re: settlement proposal[Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$375.00	\$112.50
02/04/2019	Michael Duran	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Call with Greg re: settlement proposal[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
02/04/2019	Michael Duran	A103 Draft/revise L160 Settlement/Non-Binding ADR: Drafting work on Settlement Proposal.[Total time entry of 2.4 h split between Domestic and International Classes]	1.20	\$300.00	\$360.00
02/04/2019	Gregory Corbin	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: PC with MJD re: final tweaks to settlement offer, reviewing client's interests in settling the matter.[Total time entry of 0.3 h rounded down to 0.2 h	0.10	\$275.00	\$27.50

and split between Domestic and International Classes]					
02/04/2019	Gregory Corbin	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Jump into discussion with IJR and MJD re: settlement demand.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
02/04/2019	Michael Duran	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Call with IJR re: settlement proposal (GNC participated for most of the call) [Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$300.00	\$90.00
02/05/2019	Michael Duran	A103 Draft/revise L160 Settlement/Non-Binding ADR: Finalize Settlement Proposal;[Total time entry of 2.6 h split between Domestic and International Classes]	1.30	\$300.00	\$390.00
02/05/2019	Ilyas Rona	A105 Communicate (in firm) L240 Dispositive Motions: Discuss MSJ strategy with MJD and GNC[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
02/05/2019	Michael Duran	A105 Communicate (in firm) L240 Dispositive Motions: Discuss MSJ strategy with IJR and GNC[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
02/05/2019	Gregory Corbin	A105 Communicate (in firm) L240 Dispositive Motions: Discuss MSJ strategy with IJR and MJD [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
02/05/2019	Gregory Corbin	A103 Draft/revise L160 Settlement/Non-Binding ADR: Work with excel data spreadsheet. Review for A/C privilege. Incorporate Data into offer of resolution. (PC with MJD included in this time).[Total time entry of 1.8 h split between Domestic and International Classes]	0.90	\$275.00	\$247.50
02/05/2019	Ilyas Rona	A104 Review/analyze L120 Analysis/Strategy: Reviewed statements of net losers to determine data assignments[Total time entry of 1.1 h rounded down to 1 h and split between Domestic and International Classes]	0.50	\$375.00	\$187.50
02/06/2019	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss Strategy on SJ and settlement with IJR and Lem. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
02/06/2019	Leonard Milligan	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss Strategy on SJ and settlement with IJR and MJD.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$350.00	\$35.00
02/06/2019	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss Strategy on SJ and settlement with Len and MJD.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50

02/07/2019	Gregory Corbin	A103 Draft/revise B160 Fee/Employment Applications: Revise Fee App. Draft StoneTurn App. Create Exhibits.[Total time entry of 3.4 h split between Domestic and International Classes]	1.70	\$275.00	\$467.50
02/08/2019	Gregory Corbin	A103 Draft/revise B160 Fee/Employment Applications: Prepare StoneTurn Fee App. Finalize exhibits. [Total time entry of 3.7 h rounded down to 3.6 h and split between Domestic and International Classes]	1.80	\$275.00	\$495.00
02/18/2019	Gregory Corbin	A106 Communicate (with client) L110 Fact Investigation/Development: PC and emails with class members.	0.80	\$275.00	\$220.00
02/18/2019	Michael Duran	A103 Draft/revise B160 Fee/Employment Applications: Drafting work on Stoneturn Application[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
02/18/2019	Michael Duran	A103 Draft/revise B160 Fee/Employment Applications: Drafting work on Third Fee Application [Total time entry of 2.3 h rounded down to 2.2 h and split between Domestic and International Classes]	1.10	\$300.00	\$330.00
02/18/2019	Gregory Corbin	A103 Draft/revise B160 Fee/Employment Applications: Revise fee app exhibits.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
02/22/2019	Michael Duran	A103 Draft/revise B160 Fee/Employment Applications: Prepare and hold conference with counsel for Trustee re: fee application[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
02/26/2019	Gregory Corbin	A104 Review/analyze L250 Other Written Motions and Submissions: Review claim disallowances filed today.[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$275.00	\$55.00
05/02/2019	Ilyas Rona	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration: Prepared with MJD for phone call with Charles Bennett and A. Lizotte[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
05/02/2019	Michael Duran	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration: Prepare for phone call with Charles Bennett and A. Lizotte with: IJR re: proposals [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
05/02/2019	Michael Duran	A108 Communicate (other external) L190 Other Case Assessment, Development and Administration: phone call with Charles Bennett and A. Lizotte re: IJR re: proposals [Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$300.00	\$90.00

05/02/2019	Ilyas Rona	A108 Communicate (other external) L160 Settlement/ Non-Binding ADR: Phone call with Charlie Bennett and Andy Lizotte and MJD re mechanics and potential substance of aggregate settlement[Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$375.00	\$112.50
11/13/2019	Ilyas Rona	A108 Communicate (other external) L120 Analysis/ Strategy: Phone call with Charles Bennett re reviving process now that things are more determined[Total time entry of .4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
01/24/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/ Consultants: Call with Stoneturn and MJD.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
01/24/2020	Michael Duran	A108 Communicate (other external) L130 Experts/ Consultants: Call with Stoneturn and IJR.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
01/24/2020	Ilyas Rona	A108 Communicate (other external) L160 Settlement/ Non-Binding ADR: Meet with the Trustee to discuss potential settlement and plan for expert reports and related scheduled for motions[Total time entry of 1 h split between Domestic and International Classes]	0.50	\$375.00	\$187.50
01/24/2020	Michael Duran	A108 Communicate (other external) L160 Settlement/ Non-Binding ADR: Meet with the Trustee to discuss potential settlement and plan for expert reports and related scheduled for motions[Total time entry of 1 h split between Domestic and International Classes]	0.50	\$300.00	\$150.00
01/24/2020	Ilyas Rona	A101 Plan and prepare for L160 Settlement/Non-Binding ADR: Prepare for Meeting with Trustee's Counsel with MJD.[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$375.00	\$225.00
01/24/2020	Michael Duran	A101 Plan and prepare for L160 Settlement/Non-Binding ADR: Prepare for Meeting with Trustee's Counsel with IJR.[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$300.00	\$180.00
02/11/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/ Consultants: Phone call with Stoneturn re joint motion and budget[Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$375.00	\$112.50
03/11/2020	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Phone conference with IJR to discuss expert issues and prepare for call with Murphy & Trustee[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
03/11/2020	Michael Duran	A108 Communicate (other external) L130 Experts/	0.10	\$300.00	\$30.00

		Consultants: Conference call with Charles Bennett, Andrew Lizotte, and IJR re joint motion re experts[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]			
03/11/2020	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Phone conference with MJD to discuss expert issues and prepare for call with Murphy & Trustee[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$375.00	\$75.00
03/11/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Charles Bennett, Andrew Lizotte, and MJD re joint motion re experts[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
03/12/2020	Ilyas Rona	A105 Communicate (in firm) L130 Experts/Consultants: Call to prepare with MJD for upcoming call with experts.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
03/12/2020	Michael Duran	A105 Communicate (in firm) L130 Experts/Consultants: Call to prepare with IJR for upcoming call with experts.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
03/12/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Stoneturn and MJD.[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$375.00	\$150.00
03/12/2020	Michael Duran	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Stoneturn and IJR.[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$300.00	\$120.00
03/18/2020	Ilyas Rona	A102 Research L130 Experts/Consultants: Researched data for topics to include in expert report [Total time entry of 2.3 h rounded down to 2.2 h and split between Domestic and International Classes]	1.10	\$375.00	\$412.50
04/22/2020	Michael Duran	A106 Communicate (with client) L120 Analysis/Strategy: Conference call with IJR and JHK and various participants to discuss expert strategy[Total time entry of 2 h split between Domestic and International Classes]	1.00	\$300.00	\$300.00
04/22/2020	Jin-Ho King	attend conference call w/ MJD, IJR, and certain members of the defense class[Total time entry of 2 h split between Domestic and International Classes]	1.00	\$300.00	\$300.00
04/22/2020	Ilyas Rona	A106 Communicate (with client) L120 Analysis/Strategy: Conference call with MJD and JHK and various participants to discuss expert strategy[Total time entry of 2 h split between Domestic and International Classes]	1.00	\$375.00	\$375.00

04/28/2020	Ilyas Rona	A108 Communicate (other external) L120 Analysis/Strategy: Phone call with MJD, Sandra Freitas and Sara Teixeira to discuss strategy	1.50	\$375.00	\$562.50
04/28/2020	Michael Duran	A108 Communicate (other external) L120 Analysis/Strategy: Phone call with IJR, Sandra Freitas and Sara Teixeira to discuss strategy	1.50	\$300.00	\$450.00
04/28/2020	Michael Duran	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Stoneturn (joined a few minutes later than IJR).[Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$300.00	\$90.00
04/28/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Conference call with JD, PR, and MJD to discuss rebuttal report [Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$375.00	\$150.00
05/04/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Phone conference with C. Bennett, A. Lizotte and MJD to discuss expert deadlines in light of pandemic[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
05/06/2020	Ilyas Rona	A108 Communicate (other external) L120 Analysis/Strategy: Received phone call from Jordan Shapiro re motion to intervene[Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$375.00	\$112.50
05/06/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Josh Dennis and Patrick Ryan re expert report [Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$375.00	\$112.50
05/11/2020	Ilyas Rona	A104 Review/analyze L120 Analysis/Strategy: Reviewed Judge Hoffman's order on IRS issue[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$375.00	\$150.00
05/12/2020	Jin-Ho King	review IRS decision[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
05/15/2020	Ilyas Rona	A105 Communicate (in firm) L130 Experts/Consultants: Phone conference with MJD to discuss issues raised on data transfer conference call[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
05/15/2020	Michael Duran	A105 Communicate (in firm) L130 Experts/Consultants: Phone conference with IJR to discuss issues raised on data transfer conference call[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
05/15/2020	Michael Duran	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Tim Martin, Charles	0.40	\$300.00	\$120.00

		Bennett, Josh Dennis, Patrick Martin, and IJR to discuss data transfer [Total time entry of 0.9 h rounded down to 0.8 h and split between Domestic and International Classes]			
05/15/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/ Consultants: Conference call with Tim Martin, Charles Bennett, Josh Dennis, Patrick Martin, and MJD to discuss data transfer[Total time entry of 0.9 h rounded down to 0.8 h and split between Domestic and International Classes]	0.40	\$375.00	\$150.00
05/19/2020	Ilyas Rona	A103 Draft/revise L250 Other Written Motions and Submissions: Drafting opposition to motion to intervene. [Total time entry of 5.1 h rounded down to 5.0 h and split between Domestic and International Classes]	2.50	\$375.00	\$937.50
05/19/2020	Michael Duran	A105 Communicate (in firm) L210 Pleadings: Call with IJR re: opp to motion to intervene[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
05/19/2020	Michael Duran	A105 Communicate (in firm) L210 Pleadings: Call with IJR re: opp to motion to intervene[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
05/19/2020	Michael Duran	A105 Communicate (in firm) L210 Pleadings: Call with IJR re: opp to motion to intervene[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
05/19/2020	Michael Duran	A103 Draft/revise L210 Pleadings: Legal Research re: intervention in adversary proceedings Opp to Motion to Intervene[Total time entry of 1.3 h rounded down to 1.2 h and split between Domestic and International Classes]	0.60	\$300.00	\$180.00
05/19/2020	Michael Duran	A103 Draft/revise L210 Pleadings: Drafting work on Opp to Motion to Intervene[Total time entry of 1.7 h rounded down to 1.6 h and split between Domestic and International Classes]	0.80	\$300.00	\$240.00
05/20/2020	Ilyas Rona	A103 Draft/revise L250 Other Written Motions and Submissions: Finalized opposition to motion to intervene[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$375.00	\$225.00
05/20/2020	Michael Duran	A103 Draft/revise L210 Pleadings: Drafting work on Opp to Motion to Intervene. [Total time entry of 4.2 h split between Domestic and International Classes]	2.10	\$300.00	\$630.00
05/21/2020	Ilyas Rona	A109 Appear for/attend L450 Trial and Hearing Attendance: Dialed-in to hearing on motion to intervene[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50

05/21/2020	Michael Duran	A104 Review/analyze L210 Pleadings: Attend hearing.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
05/21/2020	Michael Duran	A101 Plan and prepare for L530 Oral Argument: Prepare for hearing on intervention.[Total time entry of 1.3 h rounded down to 1.2 h and split between Domestic and International Classes]	0.60	\$300.00	\$180.00
06/02/2020	Ilyas Rona	A103 Draft/revise L250 Other Written Motions and Submissions: Drafting joint motion to modify expert schedule in light of email from Huron suggesting delays[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$375.00	\$150.00
06/02/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Phone call with Josh Dennis of Stoneturn re scheduling[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
06/04/2020	Ilyas Rona	A103 Draft/revise L250 Other Written Motions and Submissions: Revising and ECF filing joint motion to modify expert schedule in light of email from Huron suggesting delays [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
06/08/2020	Jin-Ho King	send response message to class member[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
06/24/2020	Michael Duran	A108 Communicate (other external) L130 Experts/Consultants: Prepare for and participate in call with experts.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
06/24/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Stoneturn and Huron to discuss ePOC data[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
07/01/2020	Ilyas Rona	A106 Communicate (with client) L120 Analysis/Strategy: Conference call with Sandro Freitas and Sara Teixeira to discuss expert opinions	2.10	\$375.00	\$787.50
07/09/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Zoom call with Josh Dennis, Patrick Ryan, and Gladys to discuss status of expert report, draft status, and late production of ePoc. [Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$375.00	\$112.50
07/11/2020	Ilyas Rona	A106 Communicate (with client) L120 Analysis/Strategy: Sending emails to class rep and others re request for call and outline of topics[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$375.00	\$150.00
07/11/2020	Ilyas Rona	A104 Review/analyze L130 Experts/Consultants:	2.00	\$375.00	\$750.00

		Reviewing data relating to net importers and net exporters of credits[Total time entry of 4.1 h rounded down to 4.0 h and split between Domestic and International Classes]			
07/12/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/ Consultants: Reviewing data relating to specific net winners and admissions concerning credits and forwarding same to experts. [Total time entry of 3.2 h split between Domestic and International Classes]	1.60	\$375.00	\$600.00
07/13/2020	Ilyas Rona	A111 Other L250 Other Written Motions and Submissions: Filed motions for brief extension of expert deadlines [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
07/15/2020	Michael Duran	A103 Draft/revise B160 Fee/Employment Applications: Work to finalize Third Fee Application[Total time entry of 4.4 h split between Domestic and International Classes]	2.20	\$300.00	\$660.00
			Quantity Subtotal		146.7
			Services Subtotal		\$45,167.50

Expenses

Date	Description	Quantity	Rate	Total
06/30/2018	E106 Online research: Q2 PACER fees	1.00	\$33.00	\$33.00
Expenses Subtotal				\$33.00
Quantity Total				146.7
Subtotal				\$45,200.50
Total				\$45,200.50

Please make all amounts payable to: Milligan Rona Duran & King LLC

Please pay within 30 days.

EXHIBIT J

**MILLIGAN RONA
DURAN & KING**

A PROFESSIONAL LIMITED LIABILITY COMPANY

INVOICEInvoice # 1702
Date: 07/16/2020
Due On: 08/15/2020**Milligan Rona Duran & King LLC**50 Congress Street, Suite 600
Boston, MA 02109-4075
United States
Phone: 617-395-9570

Frantz Balan

01111-Balan**TelexFREE Class Action****Services**

Date	Attorney	Description	Quantity	Rate	Total
05/01/2018	Ilyas Rona	A105 Communicate (in firm) B160 Fee/Employment Applications: Discussed service issues re MJD re application of fees[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
05/01/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: update class member communications available on telexfreelawsuit.com to show second interim fee application and notice of hearing[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
05/21/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: update DMARC policy for compliance purposes[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
05/25/2018	Michael Duran	A105 Communicate (in firm) L110 Fact Investigation/ Development: Conference call with LEM re: status of this case. [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
05/25/2018	Leonard Milligan	A105 Communicate (in firm) L110 Fact Investigation/ Development: Conference call with MJD re case status[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$350.00	\$35.00

06/18/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: discuss w/ IJR re: summary judgment and settlement strategy [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
06/18/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: discuss w/ JHK re: summary judgment and settlement strategy [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
06/20/2018	Kasey Emmons	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss settlement proposal ideas with IJR, MJD, and GNC. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$225.00	\$22.50
06/20/2018	Gregory Corbin	PC with IJR, MJD, and KAE about bigger picture of potentially resolving matter and what next steps are needed to lead to that point.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
06/20/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with MJD, GNC, and KAE to discuss action items[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
06/20/2018	Michael Duran	PC with IJR, GNC, and KAE re: resolution and litigation strategy.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
07/05/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss defense strategy based on employment law with IJR.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
07/05/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: PC with GNC re wage act[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
07/12/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with MJD discussing strategy for settlement and for summary judgment. Discuss factual issues v. legal issues.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
07/12/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: PC with GNC discussing strategy for settlement and for summary judgment. Discuss factual issues v. legal issues. [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
08/02/2018	Michael Duran	Conference call with IJR re: next steps and discuss settlement strategy [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
08/02/2018	Ilyas Rona	Conference call with mjd re: next steps and discuss settlement strategy[Total time entry of 0.4 h split	0.20	\$375.00	\$75.00

between Domestic and International Classes]					
08/06/2018	Gregory Corbin	A106 Communicate (with client) L120 Analysis/Strategy: PC from class members re: email issues.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
08/06/2018	Gregory Corbin	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: PC w/ IJR discussing potential settlement strategy.[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$275.00	\$110.00
08/06/2018	Ilyas Rona	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Phone conference with GNC discussing potential settlement strategy [Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$375.00	\$150.00
08/07/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with GNC re: settlement strategy.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
08/07/2018	Gregory Corbin	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Strategize with MJD about obtaining resolution. Review potential areas for research to resolve matters.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
08/07/2018	Gregory Corbin	A102 Research L440 Other Trial Preparation and Support: Research ethical issues in representing class through settlement.[Total time entry of 2.0 h split between Domestic and International Classes]	1.00	\$275.00	\$275.00
08/07/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: discuss settlement issues w/ GNC [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
08/07/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with JHK re settlement issue[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
08/08/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with IJR discussing research/strategy re: next steps in litigation and setting up for steps after that.[Total time entry of 1 h split between Domestic and International Classes]	0.50	\$275.00	\$137.50
08/08/2018	Gregory Corbin	A102 Research L110 Fact Investigation/Development: Continue review of accounts, credit transactions, triangular transactions, unraveling for potential settlement. [Total time entry of 2.8 h split between Domestic and International Classes]	1.40	\$275.00	\$385.00
08/08/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: PC with GNC re: research strategy[Total time entry of 1 h split between Domestic and International Classes]	0.50	\$375.00	\$187.50
08/13/2018	Gregory Corbin	A105 Communicate (in firm) L310 Written Discovery: PC	0.10	\$275.00	\$27.50

		with IJR re: determining which class members could be an example of issues. [Total time entry of 0.2 h split between Domestic and International Classes]			
08/13/2018	Gregory Corbin	A104 Review/analyze L390 Other Discovery: Review American Greed Episode re: telex free for additional information to use in defense. [Total time entry of .8 h split between Domestic and International Classes]	0.40	\$275.00	\$110.00
08/13/2018	Ilyas Rona	A105 Communicate (in firm) L310 Written Discovery: Phone call with GNC re: developing case studies for use in summary judgment [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
08/27/2018	Jin-Ho King	A104 Review/analyze L110 Fact Investigation/ Development: confirm whether individual who claims to have received settlement offer from Trustee is a member of the defense class[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
09/07/2018	Gregory Corbin	A104 Review/analyze L210 Pleadings: Review case documents for summary judgment issues.[Total time entry of 2.2 h split between Domestic and International Classes]	1.10	\$275.00	\$302.50
09/12/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: discuss matter strategy and review dockets w/ MJD. [Total time entry of 1 h split between Domestic and International Classes]	0.50	\$300.00	\$150.00
09/12/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Review Dockets with JHK re: next steps. [Total time entry of 1 h split between Domestic and International Classes]	0.50	\$300.00	\$150.00
09/12/2018	Jin-Ho King	A104 Review/analyze L110 Fact Investigation/ Development: review dockets re: case updates. [Total time entry of 1.8 h split between Domestic and International Classes]	0.90	\$300.00	\$270.00
09/12/2018	Jin-Ho King	A103 Draft/revise L120 Analysis/Strategy: outline draft communication to class members[Total time entry of .8 h split between Domestic and International Classes]	0.40	\$300.00	\$120.00
09/13/2018	Michael Duran	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration: Conference with Greg re: task assignment. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
09/13/2018	Gregory Corbin	A104 Review/analyze L250 Other Written Motions and Submissions: REview claims procedures for potential use in future settlement/resolution.[Total time entry of 1 h split between Domestic and International Classes]	0.50	\$275.00	\$137.50
09/13/2018	Gregory Corbin	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration: PC w MJD re assignment related to claims procedures[Total time	0.20	\$275.00	\$55.00

		entry of 0.4 h split between Domestic and International Classes]			
09/17/2018	Gregory Corbin	A102 Research L250 Other Written Motions and Submissions: Review pleadings and research other ponzi/pyramid scheme cases to determine potential avenues for resolution.[Total time entry of 3.4 h split between Domestic and International Classes]	1.70	\$275.00	\$467.50
09/18/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Research SJ issues to defend against.[Total time entry of 3.4 h split between Domestic and International Classes]	1.70	\$275.00	\$467.50
09/18/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: Strategy discussion with IJR on motion for summary judgment issues after review of relevant case law on "Ponzi presumption" and actual intent v. constructive fraud. Discuss settlement potentials, wage act claims.[Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$275.00	\$220.00
09/18/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss with GNC Strategy for MSJ and for reaching settlement. Discuss defenses and defeating actual and constructive fraud.[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$375.00	\$225.00
09/19/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: continue legal research for MSJ motion prep. [Total time entry of 2.7 h rounded down to 2.6 h and split between Domestic and International Classes]	1.30	\$275.00	\$357.50
09/20/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Research for SJ motion on Ponzi presumption. [Total time entry of .7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$275.00	\$82.50
09/20/2018	Jin-Ho King	A104 Review/analyze L190 Other Case Assessment, Development and Administration: review communications from TelexFree participants re: possible response[Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$300.00	\$90.00
09/21/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Research law for SJ motions. [Total time entry of 3.1 h rounded down to 3.0 h and split between Domestic and International Classes]	1.50	\$275.00	\$412.50
09/21/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with JHK re: strategy and next steps.[Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$300.00	\$90.00
09/21/2018	Jin-Ho King	A104 Review/analyze L120 Analysis/Strategy: review claims processes for purpose of preparing communication to class members[Total time entry of 3.5 h rounded down to 3.4 h and split between Domestic	1.70	\$300.00	\$510.00

and International Classes]					
09/21/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with MJD re: strategy and next steps.[Total time entry of 0.7h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$300.00	\$90.00
09/21/2018	Michael Duran	Further discussion with JHK re: claims process[Total time entry of 0.5h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
09/24/2018	Gregory Corbin	Compile MSJ research and facts [Total time entry of 2.6 h split between Domestic and International Classes]	1.30	\$275.00	\$357.50
09/24/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: discuss division of tasks between GNC and JHK [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
09/24/2018	Jin-Ho King	A103 Draft/revise L190 Other Case Assessment, Development and Administration: draft communication with defense class members [Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$300.00	\$240.00
09/24/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC w/ JHK re division of tasks[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
09/25/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Continue research on wage act and Ponzi schemes for MSJ. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
09/26/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Review and update research on wage defense. [Total time entry of 2.6 h split between Domestic and International Classes]	1.30	\$275.00	\$357.50
09/26/2018	Jin-Ho King	A103 Draft/revise L190 Other Case Assessment, Development and Administration: prepare information for defense class members [Total time entry of 3.5 h rounded down to 3.4 h and split between Domestic and International Classes]	1.70	\$300.00	\$510.00
09/27/2018	Jin-Ho King	A103 Draft/revise L190 Other Case Assessment, Development and Administration: continue working on informational presentation for defense class members [Total time entry of 2.7h rounded down to 2.6 h and split between Domestic and International Classes]	1.30	\$300.00	\$390.00
09/27/2018	Gregory Corbin	Work on Summary judgment [Total time entry of 0.5h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$275.00	\$55.00
09/28/2018	Gregory Corbin	A102 Research L110 Fact Investigation/Development: Review documents for factual support in MSJ.[Total time entry of 2.5 h rounded down to 2.4 h and split between Domestic and International Classes]	1.20	\$275.00	\$330.00

09/28/2018	Jin-Ho King	A103 Draft/revise L190 Other Case Assessment, Development and Administration: receive feedback on presentation and modify presentation based on the feedback [Total time entry of 4.5 h rounded down to 4.4 h and split between Domestic and International Classes]	2.20	\$300.00	\$660.00
09/28/2018	Gregory Corbin	A105 Communicate (in firm) L240 Dispositive Motions: PC with IJR re: summary judgment thoughts[Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$275.00	\$82.50
09/28/2018	Ilyas Rona	A105 Communicate (in firm) L240 Dispositive Motions: Summary judgment conference with GNC[Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$375.00	\$112.50
10/01/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: speak w/ MJD re: preparing information for class members[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
10/01/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with JHK re: communications to class members.[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
10/02/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Research: motion for Summary Judgment defenses and elements. Incorporate into the memorandum. [Total time entry of 3.6 h split between Domestic and International Classes]	1.80	\$275.00	\$495.00
10/10/2018	Jin-Ho King	A103 Draft/revise L190 Other Case Assessment, Development and Administration: outline additional presentation frames[Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$300.00	\$240.00
10/16/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with JHK re: emails from class members.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
10/16/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: PC with MJD re class communications.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
10/29/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with IJR to discuss strategy re: settlement [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
10/29/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with MJD to discuss strategy re: settlement [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$375.00	\$75.00
11/05/2018	Jin-Ho King	A103 Draft/revise L120 Analysis/Strategy: review notes on updating client communication[Total time entry of	0.10	\$300.00	\$30.00

0.2 h split between Domestic and International Classes]					
11/07/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with MJD re: upcoming strategy for call with class members given email from opposing counsel.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
11/07/2018	Gregory Corbin	A106 Communicate (with client) L120 Analysis/Strategy: Discuss potential avenues for a global resolution w class member MJD and IJR [Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$275.00	\$220.00
11/07/2018	Ilyas Rona	A106 Communicate (with client) L120 Analysis/Strategy: Conference call with class members, MJD, and GNC re strategy to resolve class cases in light of trustee communication[Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$375.00	\$300.00
11/07/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with GNC re: strategy for next call with class members[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
11/07/2018	Michael Duran	A106 Communicate (with client) L120 Analysis/Strategy: PC with class members and GNC and IJR. [Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$300.00	\$240.00
11/08/2018	Gregory Corbin	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Brainstorm potential settlement mechanics with IJR given duties to the two defense classes. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
11/08/2018	Ilyas Rona	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Phone conference with GNC re potential settlement mechanics [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
11/08/2018	Michael Duran	A104 Review/analyze L160 Settlement/Non-Binding ADR: Brief initial review of Trustee's settlement proposal. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
11/08/2018	Michael Duran	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Conference call about settlement possibilities post our call with class members w GNC and IJR. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
11/08/2018	Ilyas Rona	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Conference call w GNC and MJD re client call and resolution potential[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
11/08/2018	Gregory Corbin	A105 Communicate (in firm) L160 Settlement/Non-	0.20	\$275.00	\$55.00

		Binding ADR: PC with MJD&IJR re: pc with class members and resolving cases.[Total time entry of 0.4 h split between Domestic and International Classes]			
11/09/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with Len re: various settlement proposals. [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
11/09/2018	Leonard Milligan	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with MJD re: various settlement proposals.[Total time entry of 0.5h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$350.00	\$70.00
11/09/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss settlement ideas for class with GNC.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
11/09/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with MJD re: obtaining a resolution for clients. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
11/13/2018	Gregory Corbin	A106 Communicate (with client) L120 Analysis/Strategy: PC with class member re: status and expect email. [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
11/13/2018	Gregory Corbin	A102 Research L340 Expert Discovery: Prepare for dispute on expert witnesses and methods.[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$275.00	\$165.00
11/13/2018	Gregory Corbin	A105 Communicate (in firm) L130 Experts/Consultants: Discuss w IJR expert report and questions to pose to Trustee's expert[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
11/13/2018	Ilyas Rona	A105 Communicate (in firm) L130 Experts/Consultants: PC with GNC re: expert information and issues with Huron analysis.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
11/27/2018	Gregory Corbin	A104 Review/analyze L210 Pleadings: Review 79 pleadings re: claim allowances and disallowances. [Total time entry of 1.4 h split between Domestic and International Classes]	0.70	\$275.00	\$192.50
11/27/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss settlement strategies and potential for resolution, given the size of classes. Discuss claims allowances with IJR [Total time entry of 1.1 h rounded down to 1.0 h and split between Domestic and International Classes]	0.50	\$275.00	\$137.50
11/27/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy:	0.50	\$375.00	\$187.50

		Discuss w/ gnc settlement strategies claims allowances. [Total time entry of 1.1 h rounded down to 1.0 h and split between Domestic and International Classes]			
11/28/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss with MJD draft emails with clients re: status of case. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
11/28/2018	Michael Duran	A105 Communicate (in firm) L110 Fact Investigation/ Development: Conference with Greg re: class communications. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
11/28/2018	Gregory Corbin	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Draft email to class regarding outstanding issues. [Total time entry of 3.9 h rounded down to 3.8 h and split between Domestic and International Classes]	1.90	\$275.00	\$522.50
11/29/2018	Gregory Corbin	A103 Draft/revise L120 Analysis/Strategy: revise communication with clients. [Total time entry of 2.8 h split between Domestic and International Classes]	1.40	\$275.00	\$385.00
11/29/2018	Jin-Ho King	A104 Review/analyze L120 Analysis/Strategy: review class communication draft by GNC [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
11/29/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with JHK re: website FAQs and class communication. [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
11/29/2018	Jin-Ho King	A105 Communicate (in firm) L120 Analysis/Strategy: discuss next steps in class communication [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
11/29/2018	Jin-Ho King	A103 Draft/revise L120 Analysis/Strategy: review updated version of FAQ from GNC and propose changes [Total time entry of 0.8h split between Domestic and International Classes]	0.40	\$300.00	\$120.00
11/30/2018	Gregory Corbin	A103 Draft/revise L120 Analysis/Strategy: Review/revise FAQs and email. [Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$275.00	\$82.50
11/30/2018	Jin-Ho King	A103 Draft/revise L120 Analysis/Strategy: implement additional edits, review edits from GNC, and finalize version of FAQ and email for in-firm review [Total time entry of 3.8 h split between Domestic and International Classes]	1.90	\$300.00	\$570.00
11/30/2018	Gregory Corbin	A103 Draft/revise L120 Analysis/Strategy: Revise FAQs and email. [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50

12/03/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC w IJR re: email and strategy for resolution[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/03/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Conference call with GNC re resolution strategy and email with clients.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
12/04/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with MJD re: email and FAQs[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/04/2018	Gregory Corbin	A103 Draft/revise L120 Analysis/Strategy: Revise FAQs and Email[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/05/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Research SJ motions in defendant class and Ponzi scheme cases. [Total time entry of 1.1 h rounded down to 1 h and split between Domestic and International Classes]	0.50	\$275.00	\$137.50
12/06/2018	Gregory Corbin	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Review communications to ensure compliance with court's orders. Review for scope. Revise to comport.[Total time entry of 1.5 h rounded down to 1.4 h and split between Domestic and International Classes]	0.70	\$275.00	\$192.50
12/06/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC w MJD re: scope of representation and limitation in email/ FAQs page. Process going forward.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/06/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with GNC re: email notice. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
12/06/2018	Michael Duran	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Drafting of FAQs. [Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$300.00	\$240.00
12/07/2018	Michael Duran	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Drafting work on email to class members. [Total time entry of 1.4 h split between Domestic and International Classes]	0.70	\$300.00	\$210.00
12/07/2018	Michael Duran	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Drafting work on Frequently Asked Questions.[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$300.00	\$180.00

12/07/2018	Gregory Corbin	A102 Research L160 Settlement/Non-Binding ADR: Review other MLM/Ponzi/Pyramid scheme cases and use to begin drafting proposal for settlement. [Total time entry of 1.1 h rounded down to 1.0 h and split between Domestic and International Classes]	0.50	\$275.00	\$137.50
12/10/2018	Gregory Corbin	A103 Draft/revise L160 Settlement/Non-Binding ADR: Organize thoughts and discussions re: settlement proposal terms. Begin drafting offer sheet. [Total time entry of 1.4 h split between Domestic and International Classes]	0.70	\$275.00	\$192.50
12/10/2018	Ilyas Rona	A108 Communicate (other external) L120 Analysis/Strategy: Spoke with Charles Bennett and Andrew Lizotte about possible class wide resolution mechanics [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$375.00	\$75.00
12/11/2018	Leonard Milligan	A105 Communicate (in firm) L120 Analysis/Strategy: team meeting re: settlement proposals; mechanisms and theory [Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$350.00	\$140.00
12/11/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Team meeting with IJR and LEM re: possible settlement proposals.[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$300.00	\$120.00
12/11/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with IJR re: settlement portal. [Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$300.00	\$90.00
12/11/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Conference with MJD re: settlement portal. [Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$375.00	\$112.50
12/11/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Meeting w MJD & LEM re possible settlement proposals. [Total time entry of 0.8 split between Domestic and International Classes]	0.40	\$375.00	\$150.00
12/12/2018	Gregory Corbin	A104 Review/analyze L110 Fact Investigation/Development: Review data from Trustee to determine potential resolution offer.[Total time entry of 4.2 h split between Domestic and International Classes]	2.10	\$275.00	\$577.50
12/12/2018	Michael Duran	A108 Communicate (other external) L160 Settlement/Non-Binding ADR: Conference call with IJR and Trustee's counsel re: potential global resolution. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
12/12/2018	Ilyas Rona	A101 Plan and prepare for L120 Analysis/Strategy: Prepare for call with Trustee's Counsel with MJD. [Total time entry of 0.4 h split between Domestic and	0.20	\$375.00	\$75.00

International Classes]					
12/12/2018	Michael Duran	A101 Plan and prepare for L120 Analysis/Strategy: Prepare for call with Trustee's Counsel with IJR. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
12/12/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss written settlement proposal with IJR and GNC.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
12/12/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with IJR and MJD re settlement proposal[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/12/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: PC with MJD and GNC re: settlement[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
12/12/2018	Ilyas Rona	A101 Plan and prepare for L120 Analysis/Strategy: Prepare for call with Trustee's Counsel with MJD. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
12/13/2018	Gregory Corbin	A105 Communicate (in firm) L120 Analysis/Strategy: PC with IJR re: settlement prospects [Total time entry of 1.5 h rounded down to 1.4 h and split between Domestic and International Classes]	0.70	\$275.00	\$192.50
12/13/2018	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Phone call with GNC to discuss preparing draft response to Trustee's settlement proposal term sheet [Total time entry of 1.5 h rounded down to 1.4 h and split between Domestic and International Classes]	0.70	\$375.00	\$262.50
12/13/2018	Gregory Corbin	A104 Review/analyze L120 Analysis/Strategy: Review data and amend/revise term sheet. (Includes 1 hour call with MJD) [Total time entry of 3.6 h split between Domestic and International Classes]	1.80	\$275.00	\$495.00
12/13/2018	Michael Duran	A104 Review/analyze L120 Analysis/Strategy: Review spreadsheet created by GNC with GNC to help evaluate settlement potential. [Total time entry of 1 h split between Domestic and International Classes]	0.50	\$300.00	\$150.00
12/13/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: update website [Total time entry of 4.8 h split between Domestic and International Classes]	2.40	\$300.00	\$720.00
12/13/2018	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss GNC's spreadsheet. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
12/14/2018	Gregory Corbin	A103 Draft/revise L250 Other Written Motions and Submissions: Review research on and draft potential structures for offer of settlement. [Total time entry of 1.2	0.60	\$275.00	\$165.00

h split between Domestic and International Classes]					
12/14/2018	Gregory Corbin	A103 Draft/revise L120 Analysis/Strategy: Revise FAQ and Email and prepare formatting for email/website. [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
12/14/2018	Michael Duran	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Drafting changes to FAQs. [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
12/17/2018	Gregory Corbin	A103 Draft/revise L240 Dispositive Motions: review data for dispositive motion arguments. Prepare for expert.[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$275.00	\$110.00
12/17/2018	Gregory Corbin	A106 Communicate (with client) L120 Analysis/Strategy: finalize Email update and prepare for translation.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
12/17/2018	Gregory Corbin	A102 Research L240 Dispositive Motions: Review data. continue looking for more info to support potential MSJ theories. [Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$275.00	\$82.50
12/20/2018	Gregory Corbin	A104 Review/analyze L210 Pleadings: Review recent filings; [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$275.00	\$55.00
12/20/2018	Gregory Corbin	A103 Draft/revise L120 Analysis/Strategy: Review class communications; prepare. [Total time entry of 1 h split between Domestic and International Classes]	0.50	\$275.00	\$137.50
12/20/2018	Jin-Ho King	A103 Draft/revise L140 Document/File Management: update website with translations communications [Total time entry of 1.8h split between Domestic and International Classes]	0.90	\$300.00	\$270.00
12/20/2018	Gregory Corbin	A104 Review/analyze L110 Fact Investigation/ Development: Continue review of data for potential resolution. [Total time entry of 1.5 h rounded down to 1.4 and split between Domestic and International Classes]	0.70	\$275.00	\$192.50
12/20/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: initiate sending of email notice to class members and update sending script [Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
12/21/2018	Gregory Corbin	A104 Review/analyze L120 Analysis/Strategy: Review claims responses filed. [Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$275.00	\$55.00
12/21/2018	Gregory Corbin	A107 Communicate (other outside counsel) L160 Settlement/Non-Binding ADR: PC meeting with	0.80	\$275.00	\$220.00

		Stoneturn experts re: understanding data for resolution. [Total time entry of 1.7 h rounded down to 1.6 h and split between Domestic and International Classes]			
12/21/2018	Michael Duran	A107 Communicate (other outside counsel) L160 Settlement/Non-Binding ADR: Meet in person with Stoneturn experts re: understanding data for resolution. Call to GNC during this meeting. [Total time entry of 1.7 h rounded down to 1.6 h and split between Domestic and International Classes]	0.80	\$300.00	\$240.00
12/21/2018	Ilyas Rona	A107 Communicate (other outside counsel) L160 Settlement/Non-Binding ADR: Meeting with Stoneturn re: data analysis. w. MJD and GNC (by phone). Total time entry of 1.7 h rounded down to 1.6 h and split between Domestic and International Classes]	0.80	\$375.00	\$300.00
12/24/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: monitor class email sending and updated script; [Total time entry of .6 h split between Domestic and International Classes]	0.30	\$300.00	\$90.00
12/24/2018	Jin-Ho King	A108 Communicate (other external) L110 Fact Investigation/Development: speak w/ potential class member. [Total time entry of 1.1 h rounded down to 1 h and split between Domestic and International Classes]	0.50	\$300.00	\$150.00
12/26/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: review email responses, including any complaints and permanent bounces, from email sending and generate updated lists. [Total time entry of 3.4 h split between Domestic and International Classes]	1.70	\$300.00	\$510.00
12/26/2018	Jin-Ho King	A110 Manage data/files L140 Document/File Management: Sending thousands of class member emails, including creating updated Ruby version to utilize AWS SDK.[Total time entry of 3.5 h rounded down to 3.4 h and split between Domestic and International Classes]	1.70	\$300.00	\$510.00
01/02/2019	Gregory Corbin	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration: Review emails from class members[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
01/08/2019	Gregory Corbin	A107 Communicate (other outside counsel) L130 Experts/Consultants: PC with Stoneturn re: data. Follow up download and review of additional data from Stoneturn.[Total time entry of 1.7 h rounded down to 1.6 h and split between Domestic and International Classes]	0.80	\$275.00	\$220.00
01/08/2019	Michael Duran	A108 Communicate (other external) L130 Experts/ Consultants: Conference call with Stoneturn re: class settlement proposal.[Total time entry of 1.5 h rounded down to 1.4 h and split between Domestic and International Classes]	0.70	\$300.00	\$210.00
01/08/2019	Ilyas Rona	A108 Communicate (other external) L120 Analysis/	0.70	\$375.00	\$262.50

		Strategy: Joined outside conference in progress at Stoenetun with JD, (and RD, MJD and GNC by phone) to discuss strategy for teeing up possible resolution[Total time entry of 1.4 h split between Domestic and International Classes]			
01/10/2019	Gregory Corbin	A103 Draft/revise L160 Settlement/Non-Binding ADR: Research Settlements in defendant class cases. Revise drafting response to term sheet in light of conversation with Stonetun and research. [Total time entry of 1.8 h split between Domestic and International Classes]	0.90	\$275.00	\$247.50
01/11/2019	Gregory Corbin	A102 Research L160 Settlement/Non-Binding ADR: MSJ research to prepare for resolution request and MSJ. [Total time entry of 1.7 h rounded down to 1.6 h and split between Domestic and International Classes]	0.80	\$275.00	\$220.00
01/18/2019	Gregory Corbin	A103 Draft/revise L160 Settlement/Non-Binding ADR: Draft Settlement Proposal[Total time entry of 2.4 h split between Domestic and International Classes]	1.20	\$275.00	\$330.00
01/21/2019	Gregory Corbin	A103 Draft/revise L160 Settlement/Non-Binding ADR: Review and revise draft of term sheet. [Total time entry of .8 h split between Domestic and International Classes]	0.40	\$275.00	\$110.00
01/23/2019	Gregory Corbin	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Fee Application document production.[Total time entry of .9 h rounded down to .8 h and split between Domestic and International Classes]	0.40	\$275.00	\$110.00
01/24/2019	Gregory Corbin	A103 Draft/revise L250 Other Written Motions and Submissions: Draft Fee application and review exhibits.[Total time entry of 4.3 h rounded down to 4.2 h and split between Domestic and International Classes]	2.10	\$275.00	\$577.50
01/24/2019	Michael Duran	A103 Draft/revise L130 Experts/Consultants: Drafting work on settlement proposal to the Trustee.[Total time entry of 2.6 h split between Domestic and International Classes]	1.30	\$300.00	\$390.00
01/25/2019	Gregory Corbin	A103 Draft/revise L250 Other Written Motions and Submissions: continue preparing fee application [Total time entry of 1.5 h rounded down to 1.4 h and split between Domestic and International Classes]	0.70	\$275.00	\$192.50
01/29/2019	Gregory Corbin	A103 Draft/revise L250 Other Written Motions and Submissions: Revise Fee App. Review invoices and prepare other exhibits. [Total time entry of 3.9 h rounded down to 3.8 and split between Domestic and International Classes]	1.90	\$275.00	\$522.50
01/29/2019	Michael Duran	A103 Draft/revise L160 Settlement/Non-Binding ADR: Drafting work on Settlement proposal for the Trustee. [Total time entry of 1.3 h rounded down to 1.2 h and split between Domestic and International Classes]	0.60	\$300.00	\$180.00

01/29/2019	Michael Duran	A103 Draft/revise L160 Settlement/Non-Binding ADR: Continue drafting work on Settlement proposal for the Trustee. [Total time entry of 1.6 h split between Domestic and International Classes]	0.80	\$300.00	\$240.00
01/30/2019	Gregory Corbin	A103 Draft/revise B160 Fee/Employment Applications: Revise Fee application[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$275.00	\$165.00
01/31/2019	Michael Duran	A103 Draft/revise L160 Settlement/Non-Binding ADR: Substantial drafting work on Settlement Proposal.[Total time entry of 3.2 h split between Domestic and International Classes]	1.60	\$300.00	\$480.00
01/31/2019	Michael Duran	A104 Review/analyze L130 Experts/Consultants: Review of updated spreadsheet provided by experts.[Total time entry of 1.3 h rounded down to 1.2 h and split between Domestic and International Classes]	0.60	\$300.00	\$180.00
01/31/2019	Gregory Corbin	A103 Draft/revise B160 Fee/Employment Applications: Revise fee app. Discuss with IJR [Total time entry of .8 h split between Domestic and International Classes]	0.40	\$275.00	\$110.00
01/31/2019	Michael Duran	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: conference call with IJR re: settlement proposal to Trustee.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
01/31/2019	Ilyas Rona	A103 Draft/revise B160 Fee/Employment Applications: Phone conference with GNC to discuss fee application[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
02/01/2019	Michael Duran	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: conference call with IJR re: settlement proposal to Trustee.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
02/01/2019	Ilyas Rona	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: conference call with MJD re: settlement proposal to Trustee.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
02/01/2019	Gregory Corbin	A103 Draft/revise L160 Settlement/Non-Binding ADR: Revise settlement offer. Clean up and prepare to send.[Total time entry of .9 h rounded down to 0.8 h and split between Domestic and International Classes]	0.40	\$275.00	\$110.00
02/01/2019	Ilyas Rona	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Conference call with MJD re: settlement proposal to Trustee.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
02/04/2019	Gregory Corbin	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Jump into discussion with IJR and MJD re: settlement demand.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00

02/04/2019	Gregory Corbin	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: PC with MJD re: final tweaks to settlement offer, reviewing client's interests in settling the matter.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
02/04/2019	Michael Duran	A103 Draft/revise L160 Settlement/Non-Binding ADR: Drafting work on Settlement Proposal.[Total time entry of 2.4 h split between Domestic and International Classes]	1.20	\$300.00	\$360.00
02/04/2019	Michael Duran	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Call with Greg re: settlement proposal[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
02/04/2019	Michael Duran	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Call with IJR re: settlement proposal (GNC participated for most of the call) [Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$300.00	\$90.00
02/04/2019	Ilyas Rona	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR: Call with MJD and joined by GNC re: settlement proposal[Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$375.00	\$112.50
02/05/2019	Ilyas Rona	A104 Review/analyze L120 Analysis/Strategy: Reviewed statements of net losers to determine data assignments[Total time entry of 1.1 h rounded down to 1 h and split between Domestic and International Classes]	0.50	\$375.00	\$187.50
02/05/2019	Gregory Corbin	A103 Draft/revise L160 Settlement/Non-Binding ADR: Work with excel data spreadsheet. Review for A/C privilege. Incorporate Data into offer of resolution. (PC with MJD included in this time).[Total time entry of 1.8 h split between Domestic and International Classes]	0.90	\$275.00	\$247.50
02/05/2019	Gregory Corbin	A105 Communicate (in firm) L240 Dispositive Motions: Discuss MSJ strategy with IJR and MJD [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$275.00	\$55.00
02/05/2019	Michael Duran	A105 Communicate (in firm) L240 Dispositive Motions: Discuss MSJ strategy with IJR and GNC[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
02/05/2019	Ilyas Rona	A105 Communicate (in firm) L240 Dispositive Motions: Discuss MSJ strategy with MJD and GNC[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
02/05/2019	Michael Duran	A103 Draft/revise L160 Settlement/Non-Binding ADR: Finalize Settlement Proposal;[Total time entry of 2.6 h split between Domestic and International Classes]	1.30	\$300.00	\$390.00
02/06/2019	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss Strategy on SJ and settlement with Len and	0.10	\$375.00	\$37.50

		MJD.[Total time entry of 0.2 h split between Domestic and International Classes]			
02/06/2019	Leonard Milligan	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss Strategy on SJ and settlement with IJR and MJD.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$350.00	\$35.00
02/06/2019	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Discuss Strategy on SJ and settlement with IJR and Lem. [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
02/07/2019	Gregory Corbin	A103 Draft/revise B160 Fee/Employment Applications: Revise Fee App. Draft StoneTurn App. Create Exhibits.[Total time entry of 3.4 h split between Domestic and International Classes]	1.70	\$275.00	\$467.50
02/08/2019	Gregory Corbin	A103 Draft/revise B160 Fee/Employment Applications: Prepare StoneTurn Fee App. Finalize exhibits. [Total time entry of 3.7 h rounded down to 3.6 h and split between Domestic and International Classes]	1.80	\$275.00	\$495.00
02/18/2019	Gregory Corbin	A103 Draft/revise B160 Fee/Employment Applications: Revise fee app exhibits.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$275.00	\$27.50
02/18/2019	Michael Duran	A103 Draft/revise B160 Fee/Employment Applications: Drafting work on Third Fee Application [Total time entry of 2.3 h rounded down to 2.2 h and split between Domestic and International Classes]	1.10	\$300.00	\$330.00
02/18/2019	Michael Duran	A103 Draft/revise B160 Fee/Employment Applications: Drafting work on Stoneturn Application[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
02/22/2019	Michael Duran	A103 Draft/revise B160 Fee/Employment Applications: Prepare and hold conference with counsel for Trustee re: fee application[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
02/26/2019	Gregory Corbin	A104 Review/analyze L250 Other Written Motions and Submissions: Review claim disallowances filed today.[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$275.00	\$55.00
02/27/2019	Jin-Ho King	A108 Communicate (other external) L110 Fact Investigation/Development: speak w/ Victor Terry of Ohio who has received emails from us re: current status of litigation	0.50	\$300.00	\$150.00
05/02/2019	Ilyas Rona	A108 Communicate (other external) L160 Settlement/ Non-Binding ADR: Phone call with Charlie Bennett and Andy Lizotte and MJD re mechanics and potential substance of aggregate settlement[Total time entry of	0.30	\$375.00	\$112.50

		0.7 h rounded down to 0.6 h and split between Domestic and International Classes]			
05/02/2019	Michael Duran	A108 Communicate (other external) L190 Other Case Assessment, Development and Administration: phone call with Charles Bennett and A. Lizotte re: IJR re: proposals [Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$300.00	\$90.00
05/02/2019	Michael Duran	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration: Prepare for phone call with Charles Bennett and A. Lizotte with: IJR re: proposals [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
05/02/2019	Ilyas Rona	A101 Plan and prepare for L190 Other Case Assessment, Development and Administration: Prepared with MJD for phone call with Charles Bennett and A. Lizotte[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
10/29/2019	Michael Duran	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration: Conference call with participant net winner.	0.40	\$300.00	\$120.00
10/29/2019	Michael Duran	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration: Review information relevant to participant.	0.20	\$300.00	\$60.00
11/13/2019	Ilyas Rona	A108 Communicate (other external) L120 Analysis/ Strategy: Phone call with Charles Bennett re reviving process now that things are more determined[Total time entry of .4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
01/24/2020	Michael Duran	A101 Plan and prepare for L160 Settlement/Non-Binding ADR: Prepare for Meeting with Trustee's Counsel with IJR.[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$300.00	\$180.00
01/24/2020	Ilyas Rona	A101 Plan and prepare for L160 Settlement/Non-Binding ADR: Prepare for Meeting with Trustee's Counsel with MJD.[Total time entry of 1.2 h split between Domestic and International Classes]	0.60	\$375.00	\$225.00
01/24/2020	Michael Duran	A108 Communicate (other external) L160 Settlement/ Non-Binding ADR: Meet with the Trustee to discuss potential settlement and plan for expert reports and related scheduled for motions[Total time entry of 1 h split between Domestic and International Classes]	0.50	\$300.00	\$150.00
01/24/2020	Ilyas Rona	A108 Communicate (other external) L160 Settlement/ Non-Binding ADR: Meet with the Trustee to discuss potential settlement and plan for expert reports and related scheduled for motions[Total time entry of 1 h split between Domestic and International Classes]	0.50	\$375.00	\$187.50

01/24/2020	Michael Duran	A108 Communicate (other external) L130 Experts/Consultants: Call with Stoneturn and IJR.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
01/24/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Call with Stoneturn and MJD.[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
02/11/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Phone call with Stoneturn re joint motion and budget[Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$375.00	\$112.50
03/11/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Charles Bennett, Andrew Lizotte, and MJD re joint motion re experts[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
03/11/2020	Ilyas Rona	A105 Communicate (in firm) L120 Analysis/Strategy: Phone conference with MJD to discuss expert issues and prepare for call with Murphy & Trustee[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$375.00	\$75.00
03/11/2020	Michael Duran	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Charles Bennett, Andrew Lizotte, and IJR re joint motion re experts[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
03/11/2020	Michael Duran	A105 Communicate (in firm) L120 Analysis/Strategy: Phone conference with IJR to discuss expert issues and prepare for call with Murphy & Trustee[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
03/12/2020	Michael Duran	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Stoneturn and IJR.[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$300.00	\$120.00
03/12/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Stoneturn and MJD.[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$375.00	\$150.00
03/12/2020	Michael Duran	A105 Communicate (in firm) L130 Experts/Consultants: Call to prepare with IJR for upcoming call with experts.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
03/12/2020	Ilyas Rona	A105 Communicate (in firm) L130 Experts/Consultants: Call to prepare with MJD for upcoming call with experts.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50

and International Classes]					
03/18/2020	Ilyas Rona	A102 Research L130 Experts/Consultants: Researched data for topics to include in expert report [Total time entry of 2.3 h rounded down to 2.2 h and split between Domestic and International Classes]	1.10	\$375.00	\$412.50
04/22/2020	Ilyas Rona	A106 Communicate (with client) L120 Analysis/Strategy: Conference call with MJD and JHK and various participants to discuss expert strategy[Total time entry of 2 h split between Domestic and International Classes]	1.00	\$375.00	\$375.00
04/22/2020	Jin-Ho King	attend conference call w/ MJD, IJR, and certain members of the defense class[Total time entry of 2 h split between Domestic and International Classes]	1.00	\$300.00	\$300.00
04/22/2020	Michael Duran	A106 Communicate (with client) L120 Analysis/Strategy: Conference call with IJR and JHK and various participants to discuss expert strategy[Total time entry of 2 h split between Domestic and International Classes]	1.00	\$300.00	\$300.00
04/28/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Conference call with JD, PR, and MJD to discuss rebuttal report [Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$375.00	\$150.00
04/28/2020	Michael Duran	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Stoneturn (joined a few minutes later than IJR).[Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$300.00	\$90.00
05/04/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Phone conference with C. Bennett, A. Lizotte and MJD to discuss expert deadlines in light of pandemic[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
05/06/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Josh Dennis and Patrick Ryan re expert report [Total time entry of 0.7 h rounded down to 0.6 h and split between Domestic and International Classes]	0.30	\$375.00	\$112.50
05/06/2020	Ilyas Rona	A108 Communicate (other external) L120 Analysis/Strategy: Received phone call from Jordan Shapiro re motion to intervene[Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$375.00	\$112.50
05/11/2020	Ilyas Rona	A104 Review/analyze L120 Analysis/Strategy: Reviewed Judge Hoffman's order on IRS issue[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$375.00	\$150.00
05/12/2020	Jin-Ho King	review IRS decision[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
05/15/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/	0.40	\$375.00	\$150.00

		Consultants: Conference call with Tim Martin, Charles Bennett, Josh Dennis, Patrick Martin, and MJD to discuss data transfer[Total time entry of 0.9 h rounded down to 0.8 h and split between Domestic and International Classes]			
05/15/2020	Michael Duran	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Tim Martin, Charles Bennett, Josh Dennis, Patrick Martin, and IJR to discuss data transfer [Total time entry of 0.9 h rounded down to 0.8 h and split between Domestic and International Classes]	0.40	\$300.00	\$120.00
05/15/2020	Michael Duran	A105 Communicate (in firm) L130 Experts/Consultants: Phone conference with IJR to discuss issues raised on data transfer conference call[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
05/15/2020	Ilyas Rona	A105 Communicate (in firm) L130 Experts/Consultants: Phone conference with MJD to discuss issues raised on data transfer conference call[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
05/19/2020	Michael Duran	A103 Draft/revise L210 Pleadings: Drafting work on Opp to Motion to Intervene[Total time entry of 1.7 h rounded down to 1.6 h and split between Domestic and International Classes]	0.80	\$300.00	\$240.00
05/19/2020	Michael Duran	A103 Draft/revise L210 Pleadings: Legal Research re: intervention in adversary proceedings Opp to Motion to Intervene[Total time entry of 1.3 h rounded down to 1.2 h and split between Domestic and International Classes]	0.60	\$300.00	\$180.00
05/19/2020	Michael Duran	A105 Communicate (in firm) L210 Pleadings: Call with IJR re: opp to motion to intervene[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
05/19/2020	Michael Duran	A105 Communicate (in firm) L210 Pleadings: Call with IJR re: opp to motion to intervene[Total time entry of 0.5 h rounded down to 0.4 h and split between Domestic and International Classes]	0.20	\$300.00	\$60.00
05/19/2020	Michael Duran	A105 Communicate (in firm) L210 Pleadings: Call with IJR re: opp to motion to intervene[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
05/19/2020	Ilyas Rona	A103 Draft/revise L250 Other Written Motions and Submissions: Drafting opposition to motion to intervene. [Total time entry of 5.1 h rounded down to 5.0 h and split between Domestic and International Classes]	2.50	\$375.00	\$937.50
05/20/2020	Michael Duran	A103 Draft/revise L210 Pleadings: Drafting work on Opp to Motion to Intervene. [Total time entry of 4.2 h split between Domestic and International Classes]	2.10	\$300.00	\$630.00
05/20/2020	Ilyas Rona	A103 Draft/revise L250 Other Written Motions and	0.60	\$375.00	\$225.00

		Submissions: Finalized opposition to motion to intervene[Total time entry of 1.2 h split between Domestic and International Classes]			
05/21/2020	Michael Duran	A101 Plan and prepare for L530 Oral Argument: Prepare for hearing on intervention.[Total time entry of 1.3 h rounded down to 1.2 h and split between Domestic and International Classes]	0.60	\$300.00	\$180.00
05/21/2020	Michael Duran	A104 Review/analyze L210 Pleadings: Attend hearing.[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$300.00	\$30.00
05/21/2020	Ilyas Rona	A109 Appear for/attend L450 Trial and Hearing Attendance: Dialed-in to hearing on motion to intervene[Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
06/02/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Phone call with Josh Dennis of Stoneturn re scheduling[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$375.00	\$37.50
06/02/2020	Ilyas Rona	A103 Draft/revise L250 Other Written Motions and Submissions: Drafting joint motion to modify expert schedule in light of email from Huron suggesting delays[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$375.00	\$150.00
06/04/2020	Ilyas Rona	A103 Draft/revise L250 Other Written Motions and Submissions: Revising and ECF filing joint motion to modify expert schedule in light of email from Huron suggesting delays [Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
06/08/2020	Jin-Ho King	send response message to class member[Total time entry of 0.3 h rounded down to 0.2 h and split between Domestic and International Classes]	0.10	\$300.00	\$30.00
06/24/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Conference call with Stoneturn and Huron to discuss ePOC data[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$375.00	\$75.00
06/24/2020	Michael Duran	A108 Communicate (other external) L130 Experts/Consultants: Prepare for and participate in call with experts.[Total time entry of 0.4 h split between Domestic and International Classes]	0.20	\$300.00	\$60.00
07/09/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Zoom call with Josh Dennis, Patrick Ryan, and Gladys to discuss status of expert report, draft status, and late production of ePoc. [Total time entry of 0.6 h split between Domestic and International Classes]	0.30	\$375.00	\$112.50
07/11/2020	Ilyas Rona	A104 Review/analyze L130 Experts/Consultants: Reviewing data relating to net importers and net	2.00	\$375.00	\$750.00

		exporters of credits[Total time entry of 4.1 h rounded down to 4.0 h and split between Domestic and International Classes]			
07/11/2020	Ilyas Rona	A106 Communicate (with client) L120 Analysis/Strategy: Sending emails to class rep and others re request for call and outline of topics[Total time entry of 0.8 h split between Domestic and International Classes]	0.40	\$375.00	\$150.00
07/12/2020	Ilyas Rona	A108 Communicate (other external) L130 Experts/Consultants: Reviewing data relating to specific net winners and admissions concerning credits and forwarding same to experts. [Total time entry of 3.2 h split between Domestic and International Classes]	1.60	\$375.00	\$600.00
07/13/2020	Ilyas Rona	A111 Other L250 Other Written Motions and Submissions: Filed motions for brief extension of expert deadlines [Total time entry of 0.2 h split between Domestic and International Classes]	0.10	\$375.00	\$37.50
07/15/2020	Michael Duran	A103 Draft/revise B160 Fee/Employment Applications: Work to finalize Third Fee Application[Total time entry of 4.4 h split between Domestic and International Classes]	2.20	\$300.00	\$660.00
			Quantity Subtotal		137.0
			Services Subtotal		\$41,662.50

Expenses

Date	Description	Quantity	Rate	Total
12/31/2017	E106 Online research: Q4 PACER research	1.00	\$10.10	\$10.10
03/31/2018	E106 Online research: Q1 PACER research	1.00	\$9.80	\$9.80
04/27/2018	E123 Other professionals: Ayvazian invoice MSC 18-0328 for Portuguese translation	1.00	\$246.00	\$246.00
05/01/2018	E124 Other: DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	1.00	\$5.05	\$5.05
06/01/2018	E124 Other: DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	1.00	\$5.05	\$5.05
06/30/2018	E106 Online research: Q2 PACER research	1.00	\$7.60	\$7.60
07/01/2018	E124 Other: DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	1.00	\$5.05	\$5.05
08/01/2018	E124 Other: DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	1.00	\$5.05	\$5.05
09/01/2018	E124 Other: DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	1.00	\$5.05	\$5.05

09/30/2018	E106 Online research: Q3 PACER research	1.00	\$49.20	\$49.20
10/01/2018	E124 Other: DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	1.00	\$5.05	\$5.05
11/01/2018	E124 Other: DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	1.00	\$5.05	\$5.05
12/01/2018	E124 Other: DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	1.00	\$5.05	\$5.05
12/18/2018	E125 Translation: Translate email and FAQs to Spanish	1.00	\$118.00	\$118.00
12/18/2018	E125 Translation: Translate email and FAQs to Portuguese.	1.00	\$118.00	\$118.00
01/01/2019	E124 Other: DigitalOcean monthly invoice for hosting telexfreelawsuit.com website	1.00	\$5.05	\$5.05
01/01/2019	E106 Online research: LexisNexis research charges 2017Q3 through 2018Q4	1.00	\$183.09	\$183.09
01/03/2019	E124 Other: Amazon Web Services, Inc. invoice 164677744 batch email sending through SES (with notifications)	1.00	\$20.83	\$20.83
03/31/2020	E106 Online research: PACER Q1	1.00	\$1.50	\$1.50
06/01/2020	E106 Online research: Westlaw bill for May.	1.00	\$29.71	\$29.71
Expenses Subtotal			\$839.28	
Quantity Total			137.0	
Subtotal			\$42,501.78	
Total			\$42,501.78	

Please make all amounts payable to: Milligan Rona Duran & King LLC

Please pay within 30 days.

EXHIBIT K

ILYAS J. RONA

Ilyas J. Rona is a founding partner of the Milligan Rona Duran & King LLC. For more than two decades, Mr. Rona has successfully represented mostly plaintiffs in various types of complex civil litigation. Mr. Rona has helped his clients obtain hundreds of millions of dollars in favorable recoveries.

Mr. Rona has successfully litigated large commercial cases, such as fraud claims, consumer protection actions, pharmaceutical litigation, attorney and accountant malpractice, insurance disputes, and bankruptcy litigation. Mr. Rona has also successfully litigated *qui tam* actions under the false claims act, assisting clients in recovering hundreds of millions in damages. He has helped his clients and their families achieve significant compensation in cases for wrongful death or personal injury, including industrial/construction accidents, medical malpractice, and negligence cases. And he has helped his clients achieve fair compensation in employment cases involving wrongful termination and retaliation.

Successful representations include the following matters:

- Mr. Rona assisted a bankruptcy trustee in recovering \$7.4 million from insurance companies that provided insurance to Molten Metal Technology's officers and directors.
- Mr. Rona also assisted Molten Metal Technology's bankruptcy trustee in recovering \$9.6 million in settlement of claims that Lockheed Martin Corp. received an avoidable preference through a restructuring of its joint venture with MMT that was designed to avoid tax liability and remove the lone valuable asset before it entered receivership.
- Mr. Rona also assisted the bankruptcy trustee in recovering \$3.5 million recovered to settle of claims that Molten Metal Technology's other corporate partner, CBS/Westinghouse, received a fraudulent transfer by coercively divesting its half interest in a nuclear waste treatment plant by selling it a grossly inflated price.
- Mr. Rona was a member of the trial team that obtained a \$142 million verdict against Pfizer for fraudulent marketing of the drug Neurontin for various off-label uses.
- Mr. Rona assisted a construction worker in recovering \$1.6 from the owner of a backhoe who negligently failed to ensure a safe work area, which caused the backhoe to strike the worker in back.

- Mr. Rona conducted the discovery in a non-intervened *qui tam* case against Pfizer relating to the off-label marketing of the drug Detrol.
- Mr. Rona assisted a Boston-based pharmaceutical company obtain compensation for damages suffered as a result alleged breaches of an out-license agreement.
- Mr. Rona assisted the family of an electrical sign installer in recovering \$2.4 million in compensation from the Holyoke Mall's owner after the sign installer was electrocuted while replacing interior neon lighting at the mall that was susceptible to becoming energized.
- Mr. Rona successfully recovered compensation for a factually innocent man who because of malfeasance committed by a government employee spent nearly two years in prison for a crime he did not commit.

Bar Admissions

Massachusetts
U.S. Court of Appeals for the First Circuit
U.S. District Court District of Massachusetts

Education

Northwestern University School of Law, Chicago, Illinois.
J.D. – 1998
Brown University, Providence, Rhode Island
A.B. (*Magna Cum Laude*) – 1995. Major: Political Science

LEONARD E. MILLIGAN III

Len Milligan is a founding partner of the Milligan Rona Duran & King LLC. His practice focuses on litigation in state and federal courts.

Mr. Milligan has been named a 'Rising Star' by the editors of New England Super Lawyers and Boston Magazine. In 2010, he was a scholarship recipient to the National Criminal Defense College, learning and working with ninety-six of the best lawyers from around the country on cutting edge trial issues. In 2011, Len was featured by Massachusetts Lawyers Weekly and the Massachusetts Bar Association's Excellence in the Law Awards as an "Up & Coming" Lawyer.

Mr. Milligan is a member of adjunct faculty at Northeastern University School of Law, where he teaches a clinical course in Criminal Advocacy. He also teaches courses in trial advocacy each fall at the Criminal Justice Institute at Harvard Law. Mr. Milligan also teaches Zealous Advocacy for MCLE and CPCS. Len has given expert legal commentary on Fox, ABC, NPR, and WEEL.

Mr. Milligan represents companies, large and small, in business litigation matters with serious consequences. His thorough work product and unique approach to dealing with opposing counsel often sets him apart from other litigators in the field.

Len Milligan has extensive experience in serious felony criminal defense litigation and has represented hundreds of people in state and federal courts. He is certified by the Committee for Public Counsel Services (CPCS) to represent individuals in Superior and Appellate Courts in Massachusetts, and prides himself on his reputation among his peers as a dedicated and focused lawyer.

Bar Admissions

Massachusetts
U.S. District Court District of Massachusetts

Education

New England School of Law, Boston, Massachusetts
J.D.

University of Vermont, Burlington, Vermont
(Philosophy, Economics)

Faculty Appointments

Trial Advocacy, Harvard Law School
Criminal Advocacy and Clinic, Northeastern School of Law
MCLE/CPCS Zealous Advocacy

Honors and Awards

New England SuperLawyers Magazine–Rising Star, 2009 – 2015
Massachusetts Lawyers Weekly – Excellence in the Law, 2011
Scholarship recipient to the National Criminal Defense College

Professional Associations and Memberships

National Association of Criminal Defense Lawyers, Member, 2010
Massachusetts Association of Criminal Defense Lawyers, Member, 2007

MICHAEL J. DURAN

Mike Duran is a partner at Milligan Rona Duran & King LLC. While Mr. Duran now works in the firm's Boston office, he spent a number of years living in Colorado. Mr. Duran focuses on real estate development, land use, lending, foreclosure, venture capital, commercial litigation, and bankruptcy litigation. His clients include individuals, businesses, and non-profits from both Massachusetts and Colorado.

Prior to joining Milligan Rona, Mr. Duran worked for Rider & Quesenberry, LLP, a law firm that served as the court appointed Receiver for Valley Mortgage, Inc. (In re: Valley Mortgage, Inc., No. 10-19101-SBB), a multi-million dollar real estate based Ponzi scheme. Mr. Duran has significant experience pursuing UFTA claw-back claims in state courts, federal district courts, and bankruptcy courts.

Bar Admissions

Massachusetts

Colorado

U.S. District Court District of Massachusetts

U.S. District Court District of Colorado

Education

University of Minnesota Law School, Minneapolis, Minnesota
J.D.

Boston College, Chestnut Hill, Massachusetts
B.A. Major: English / Philosophy

Professional Associations and Memberships

Colorado Bar Association

Pitkin County Bar Association

JIN-HO KING

Jin-Ho King is a founding partner in Milligan Rona's Boston office. He concentrates his practice in criminal and civil appeals and litigation. He represents individuals and organizations seeking thoughtful guidance through complex disputes, investigations, and prosecutions.

Mr. King's wide-ranging litigation experience gives him keen insight on the issues his clients face. He has prevailed for his clients in contested jury trials and appeals in both state and federal courts. He also has particular subject-matter experience in criminal law, copyright, and civil asset forfeiture, as well as specific experience representing litigants accused of financial wrongdoing, including defendants charged with fraud, larceny by a fiduciary, and embezzlement.

Prior to joining Milligan Rona Duran & King LLC, Mr. King was an associate at a small Boston-based litigation firm for several years. Mr. King has also worked as a summer associate at a large law firm in Boston, as a public defender intern with the Committee for Public Counsel Services, and as an English editor and translator for an international law firm in China and Taiwan.

Mr. King received his Bachelor of Arts from Cornell University and his Juris Doctor with Honors from the George Washington University Law School. In law school, he served as the editor-in-chief of the George Washington International Law Review. Mr. King speaks fluent Mandarin Chinese.

Bar Admissions

Massachusetts
New York

U.S. District Court for the District of Massachusetts
U.S. District Court for the Eastern District of New York
U.S. District Court for the Southern District of New York
U.S. Court of Appeals for the First Circuit
U.S. Court of Appeals for the Second Circuit

Faculty Appointments

2017-2018 Lecturer, Boston University School of Law

Education

The George Washington University Law School, Washington, District of Columbia (Juris Doctor with Honors. Editor-in-Chief, *The George Washington International Law Review*)

Cornell University, Ithaca, New York
(Bachelor of Arts; Major: English)

Professional Associations and Memberships

American Bar Association Judicial Division
2016–2018 Member, Court Technology Committee
American Bar Association Young Lawyers Division
2016–2018 Liaison, Death Penalty Representation Project Special Committee
2016–2018 Co-Chair, Criminal Justice Committee
2015–2016 Senior Content Editor
Massachusetts Association of Criminal Defense Lawyers

Languages

English
Mandarin Chinese

Recent Published Opinions

Commonwealth v. Firmin, 89 Mass. App. Ct. 62, 46 N.E.3d 558 (2016)
Bradley v. Sugarbaker, 809 F.3d 8 (1st Cir. 2015)
Commonwealth v. Cullity, 470 Mass. 1022, 25 N.E.3d 313 (2015)
Commonwealth v. Shea, 467 Mass. 788, 7 N.E.3d 1028 (2014)

GREGORY N. CORBIN (*no longer with the firm*)

Greg Corbin was formerly an associate of Milligan Rona Duran & King LLC, practicing in both civil litigation and real-estate transactions.

Mr. Corbin had experience with complex litigation, including cases involving fraud, business disputes, adversary actions in bankruptcy, civil rights, wrongful death, medical malpractice, employment, wrongful termination, and wage act claims.

Bar Admissions

Massachusetts

Colorado

U.S. District Court District of Massachusetts

U.S. District Court District of Colorado

Education

Boston University School of Law, Boston, Massachusetts

Kansas State University, Manhattan, Kansas

KASEY A. EMMONS

Kasey Emmons is an associate with the firm, practicing in both civil and criminal litigation.

Ms. Emmons joined Milligan Rona Duran & King LLC as an associate in 2016. Prior to joining Milligan Rona Duran & King LLC, Ms. Emmons served as a judicial intern to the Honorable Amy Blake of the Massachusetts Appeals Court. Ms. Emmons also worked as a legal intern for several practitioners in Boston, assisting on cases involving criminal, civil, and immigration law.

Ms. Emmons received her Bachelor of Arts from the University of Vermont in 2013, and her Juris Doctor, *cum laude*, from New England Law | Boston in 2016. In law school, she served as a Comment and Note Editor of the New England Law Review.

Bar Admissions

Massachusetts
Vermont
U.S. District Court District of Massachusetts

Education

New England Law | Boston, Boston, Massachusetts
University of Vermont, Burlington, Vermont