

Joseph P. Guglielmo (*pro hac vice*)  
**SCOTT+SCOTT ATTORNEYS AT LAW LLP**  
The Helmsley Building  
230 Park Avenue, 17th Floor  
New York, NY 10169  
Telephone: (212) 223-6444  
Facsimile: (212) 223-6334  
jguglielmo@scott-scott.com

*Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII**

STEPHEN G. AQUILINA and LUCINA J. AQUILINA, Individually and on Behalf of All Others Similarly Situated; and DONNA J. CORRIGAN and TODD L. CORRIGAN, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

CERTAIN UNDERWRITERS AT LLOYD'S LONDON; LLOYD'S SYNDICATE #2003; LLOYD'S SYNDICATE #318; LLOYD'S SYNDICATE #4020; LLOYD'S SYNDICATE #2121; LLOYD'S SYNDICATE #2007; LLOYD'S SYNDICATE #1183; LLOYD'S SYNDICATE #1729; LLOYD'S SYNDICATE #510; BORISOFF INSURANCE SERVICES, INC. d/b/a MONARCH E&S INSURANCE SERVICES; SPECIALTY PROGRAM GROUP, LLC d/b/a SPG INSURANCE SOLUTIONS, LLC; ALOHA INSURANCE SERVICES, INC.; ILIKEA LLC d/b/a MOA INSURANCE SERVICES HAWAII; and DOES 1-100,

Defendants.

No. 1:18-cv-00496-ACK-KJM

**DECLARATION OF  
JOSEPH P. GUGLIELMO  
IN SUPPORT OF  
PLAINTIFFS' MOTION  
FOR ATTORNEYS' FEES,  
LITIGATION EXPENSES,  
AND SERVICE AWARDS**

Trial Judge: Alan C. Kay  
Hearing Date: March 3, 2022  
Trial Date: February 1, 2022  
(stayed)

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I, Joseph P. Guglielmo, pursuant to 28 U.S.C. §1746, declare:

1. I am a partner with the law firm Scott+Scott Attorneys at Law LLP (“Scott+Scott”), counsel for Plaintiffs Stephen G. Aquilina and Lucina J. Aquilina (the “Aquilina Plaintiffs”) and Plaintiffs Donna J. Corrigan and Todd L. Corrigan (the “Corrigan Plaintiffs”) (collectively, “Plaintiffs”) in the above-referenced action. I am an attorney duly licensed by the State of New York, Commonwealth of Massachusetts, District of Columbia, and am admitted to practice *pro hac vice* in this case. I submit this Declaration in support of Plaintiffs’ Motion for Attorneys’ Fees, Litigation Expenses, and Service Awards (the “Fee Application”). This Declaration is based on my personal knowledge and if called upon, I could and would competently testify thereto.

2. For over 25 years, my law practice has focused on representing plaintiffs in complex civil litigation. For the last several years, I have spent the bulk of my professional time representing clients, which include financial institutions, consumers, and ERISA plan participants in complex antitrust, consumer, and securities actions.

## I. INTRODUCTION

3. The Parties have entered into a Settlement Agreement (the “Settlement”), which provides for \$1.8 million in cash payments to Class Members,<sup>1</sup> and, if approved, would resolve the Litigation with Defendants. The Settlement provides that each Defendant is to pay the following amounts: (i) Underwriters – \$1.4 million; (ii) Monarch – \$200,000; (iii) Aloha – \$100,000; and (iv) Moa – \$100,000. The Settlement further provides that certain Defendants also agree to pay up to \$50,000 to the Settlement Administrator to defray the actual expenses of notice of the Settlement and all expenses attendant to the administration of the class action settlement.

4. Based on my and my expert’s analysis of the number of Class Members, all of whom are known and identified on the Class List, which is based upon Defendants’ business records, following deductions for the payment of attorneys’ fees, expenses and Service Awards, the Settlement Fund will be sufficient to reimburse Class Members the full amount of premiums they paid to Defendants for surplus lines insurance policies placed during the Class Period.

5. The Settlement is the product of arm’s-length negotiations over the course of many months, among experienced counsel, overseen and facilitated by

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<sup>1</sup> Unless otherwise defined herein, all capitalized terms have the meanings ascribed to them in the Settlement Agreement and Release (ECF No. 408).

mediator Keith Hunter of Dispute Prevention & Resolution, Inc. Plaintiffs and Class Counsel were actively engaged in the Litigation and had a thorough understanding of the relative strengths and weaknesses of the claims asserted in the Litigation at the time they reached the Settlement.

6. The Distribution Plan was developed by Class Counsel in consultation with Plaintiffs' damages expert and the Claims Administrator. It was designed to fairly and equitably allocate the Net Settlement Fund among Class Members by a proportion based on the total premium dollar amount each Settlement Class Member paid during the Class Period. Notably, Class Members under the Distribution Plan will automatically receive payments from the Net Settlement Fund and are not required to file a claim or provide any documentation. Indeed, the Settlement provides that automatic payments be made to Class Members.

## **II. CLASS COUNSEL'S PROSECUTION OF THE ACTION**

### **A. Case Investigation, Pleadings, and Motion Practice**

7. Following the May 2018 eruption of Kilauea, Class Counsel began their months-long investigation into the Lloyd's of London insurance market for residential properties located in Lava Zone 1 on the island of Hawai'i.

8. As a result of their extensive investigation, on December 21, 2018, the Aquilina Plaintiffs filed the Class Action Complaint alleging claims under Hawaii state law against Moa, Monarch, and Underwriters. ECF No. 1.<sup>2</sup>

9. The Court entered the Joint Stipulation and Agreement between the Aquilina Plaintiffs, Underwriters, and Monarch on March 1, 2019, setting forth the date on which Underwriters and Monarch would answer, move, or otherwise respond to the Class Action Complaint. ECF No. 29. On March 6, 2019, Underwriters and Monarch separately filed their motions to dismiss the Class Action Complaint pursuant to Rule 12(b)(6) for failure to state a claim and supporting memoranda of law. ECF Nos. 30-33.

10. On April 1, 2019, the Court entered the First Joint Stipulation and Agreement between the Aquilina Plaintiffs and Moa setting forth the date on which Moa would answer, move, or otherwise respond to the Class Action Complaint. ECF No. 56. On April 22, 2019, Moa filed its motion to dismiss the Class Action Complaint pursuant to Rule 12(b)(6) for failure to state a claim and supporting memorandum of law. ECF Nos. 63, 64.

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<sup>2</sup> The Class Action Complaint included two additional plaintiffs, Audra M. Lane and Scott K. Lane, and their retail broker, Pyramid Insurance Centre, Ltd., as a defendant. These parties were not named in subsequent complaints. The Class Action Complaint also did not name Syndicate #510 as a Defendant in the Litigation.

11. Following a conference with Judge Mansfield, on May 7, 2019, the Court stayed discovery in the Litigation pending Judge Kay's rulings on the motions to dismiss. ECF No. 72.

12. On August 6, 2019, the Aquilina Plaintiffs opposed Underwriters' and Monarch's motions to dismiss in two separate memoranda of law. ECF Nos. 77, 78. Underwriters and Monarch filed their reply memoranda of law on August 13, 2019. ECF Nos. 85, 86.

13. On August 20, 2019, the Aquilina Plaintiffs opposed Moa's motion to dismiss. ECF No. 87. Moa filed its reply memorandum of law on August 27, 2019. ECF No. 96.

14. The Court heard oral argument on Monarch's and Underwriters' motions to dismiss on August 21, 2019 (ECF No. 95), and separately heard oral argument on Moa's motion to dismiss on September 5, 2019 (ECF No. 101).

15. On September 26, 2019, the Court entered separate orders granting Underwriters', Monarch's, and Moa's motions to dismiss in their entirety and granting the Aquilina Plaintiffs leave to file an amended complaint within 30 days of the opinion. ECF Nos. 106, 107, 109.

16. Following an extension of time to amend their complaint, on December 12, 2019, Plaintiffs filed the First Amended Class Action Complaint adding the

Corrigan Plaintiffs, adding Aloha as a Defendant, and revising the allegations in accordance with the Court's orders on the motions to dismiss. ECF No. 114.

17. The First Amended Class Action Complaint alleged claims for violations of HRS §§480-1, *et seq.* (as to all Defendants), breach of the implied covenant of good faith and fair dealing (as to Underwriters), negligence (as to Moa and Aloha), and unjust enrichment (as to all Defendants). ECF No. 114.

18. On January 9, 2020, the Court entered the Joint Stipulation and Agreement between Plaintiffs, Underwriters, Monarch, Moa, and Aloha setting forth the date on which Defendants would answer, move, or otherwise respond to the First Amended Class Action Complaint. ECF No. 117.

19. On February 13, 2020, Moa and Aloha separately filed their motions to dismiss the First Amended Class Action Complaint or, in the alternative, stay this action in its entirety and memoranda of law. ECF Nos. 120, 121.

20. On February 27, 2020, Underwriters and Monarch separately filed their motions to dismiss the First Amended Class Action Complaint and memoranda of law. ECF Nos. 126, 128.

21. On April 28, 2020, Plaintiffs filed their memoranda of law in opposition to Defendants' motions to dismiss. ECF Nos. 138-41. That same day, Moa filed a joinder to Aloha's motion to dismiss. ECF No. 144. Defendants filed their reply memoranda of law on May 5, 2020. ECF Nos. 151-54.



22. On May 19, 2020, the Court held oral argument telephonically on Defendants' motions to dismiss. ECF No. 157.

23. On June 10, 2020, the Court issued two separate orders ruling on Defendants' motions to dismiss. ECF Nos. 159, 160. The Court granted in part and denied in part Underwriters' and Monarch's motions to dismiss. ECF No. 159. Specifically, the Court sustained Plaintiffs' claims for violations of HRS §§480-1, *et seq.*, and breach of the implied covenant of good faith and fair dealing and dismissed without prejudice Plaintiffs' claim for unjust enrichment against Underwriters and Monarch. Although the Court's Order stated that Plaintiffs could amend the First Amended Class Action Complaint within 30 days to cure the defects identified by the Court as to their unjust enrichment claim against Underwriters and Monarch, Plaintiffs did not amend the First Amended Class Action Complaint at that time.

24. Additionally, the Court denied Moa's and Aloha's motions to dismiss or, in the alternative, stay this action in their entirety, declining to abstain from exercising federal jurisdiction under the doctrine in *Colo. River Water Conservation Dist. v. United States*, 424 U.S. 800 (1976). ECF No. 160. Accordingly, Plaintiffs' claims for violations of HRS §§480-1, *et seq.*, negligence, and unjust enrichment were sustained against Moa and Aloha.

25. On July 10, 2020, Defendants filed their answers and affirmative defenses to the First Amended Class Action Complaint. ECF Nos. 166, 168, 172, 173. After meeting and conferring with Class Counsel regarding Moa's answer to the First Amended Class Action Complaint, on July 29, 2020, Moa filed its amended answer and affirmative defenses. ECF No. 178.

26. On July 17, 2020, the Court held a Rule 16 Scheduling Conference and entered a Scheduling Order in the Litigation. ECF Nos. 176, 177. The Court set a May 14, 2021 close-of-fact-discovery deadline and February 1, 2022 trial date. ECF No. 177.

27. On November 17, 2020, Moa moved to deny class certification. ECF No. 219. On November 24, 2020, Aloha filed a motion for joinder to Moa's motion to deny class certification. ECF No. 228. On February 4, 2021, Plaintiffs filed their opposition to Moa's motion to deny class certification and Aloha's joinder. ECF No. 327. That same day, Underwriters filed a motion for joinder to Moa's motion to deny class certification. ECF No. 285. On May 20, 2021, Moa filed its reply memorandum of law. ECF No. 394.

28. On December 9, 2020, Plaintiffs moved for leave to file the Second Amended Class Action Complaint, which was identical in all respects to the First Amended Class Action Complaint, but added Lloyd's Syndicate #510 as a Defendant. ECF No. 236. On February 3, 2021, the Court entered an order

permitting Plaintiffs to file the Second Amended Class Action Complaint. ECF No. 283. On February 10, 2021, Plaintiffs filed the Second Amended Class Action Complaint. ECF No. 302. Thereafter, each Defendant filed its answer and affirmative defenses to the Second Amended Class Action Complaint. ECF Nos. 311, 321, 324, 331.

29. On February 4, 2021, Monarch also filed a motion for class decertification. ECF No. 286. On February 8, 2021, Aloha filed a motion for joinder to Monarch's motion for class decertification. ECF No. 293. On March 24, 2021, Underwriters filed a motion to deny class certification. ECF No. 338. On March 25, 2021, Aloha filed a motion for joinder to Underwriters' motion to deny class certification. ECF No. 341. Plaintiffs filed an omnibus memorandum of law in opposition to Monarch's motion for decertification and Underwriters' motion to deny certification and Aloha's joinder to Underwriters' motion (ECF No. 381) and a memorandum of law in opposition to Aloha's joinder to Monarch's motion for decertification (ECF No. 383). On May 20, Monarch and Underwriters filed a joint reply memorandum of law and Aloha filed a reply memorandum of law. ECF No. 293, 395.

30. On March 10, 2021, Plaintiffs served on Defendants two separate expert reports.

31. On March 26, 2021, Plaintiffs filed a motion for class certification. ECF No. 343. Underwriters and Monarch filed a joint opposition (ECF No. 382) to Plaintiffs' motion for class certification, which Moa and Aloha each joined (ECF Nos. 384-85), and Plaintiffs filed a reply memorandum of law in support of their motion for class certification (ECF No. 392).

32. Also on March 26, 2021, Plaintiffs filed three separate motions for summary judgment against Defendants. ECF Nos. 346, 352, 354. On that same day, each Defendant also moved for summary judgment against Plaintiffs. ECF Nos. 344, 347, 350, 356.

33. On April 30, 2021, Defendants served on Plaintiffs their respective expert reports.

**B. Discovery**

34. With a May 14, 2021 close-of-fact-discovery deadline and February 1, 2022 trial date, Class Counsel diligently pursued discovery from Defendants. On July 27, 2020, Plaintiffs served their Amended Requests for Production of Documents to All Defendants, which contained 35 requests for production covering both data and electronically-stored information.

35. In addition, on October 21, 2020, Plaintiffs served separate First Set of Requests for Admission on Defendants, which contained between 33 and 54 requests for admission, depending on the Defendant. On October 29, 2020, Plaintiffs also

served separate interrogatories on Defendants, which contained between 10 and 15 interrogatories, depending on the Defendant.

36. Class Counsel conducted numerous telephonic meet-and-confers separately with each Defendant to attempt to resolve disputes regarding the scope of these discovery requests. Several discovery disputes could not be resolved by the Parties and required resolution through the expedited procedure in Local Rule 37.1(a) in front of Judge Mansfield.

37. On December 22, 2020, Plaintiffs filed two letter briefs under Local Rule 37.1(a) regarding Aloha's responses to Plaintiffs' First Requests for Admissions and Plaintiffs' First Request for Answers to Interrogatories. ECF Nos. 250, 251. Judge Mansfield held a hearing on January 4, 2021, in which he ordered that Aloha produce amended discovery responses. ECF No. 264.

38. On February 9, 2021, Plaintiffs filed a letter brief under Local Rule 37.1(a) regarding Aloha's failure to produce the names and addresses of putative class members who purchased insurance placed by Aloha and brokered through Monarch for their homes in Lava Zones 1 and 2. ECF No. 298. Judge Mansfield held a hearing on February 16, 2021, in which he ordered that Aloha produce responsive address and insurance-premium information with its customers' names redacted in its production. ECF No. 313.

39. Starting on November 19, 2020 and continuing through February 2, 2021, Class Counsel took 13 Rule 30(b)(1) and 30(b)(6) depositions of Defendants' witnesses remotely via Zoom.

40. On March 3, 2021, Plaintiffs served their Second Requests for Production of Documents to All Defendants, which contained 15 requests for production covering both data and electronically-stored information.

41. In response to Plaintiffs' document requests, Defendants produced 4,391 documents totaling 24,838 pages, which Plaintiffs reviewed and analyzed for purposes of taking depositions, briefing class certification and summary judgment, and preparing for settlement discussions with Defendants.

42. Plaintiffs also responded to numerous discovery requests from Defendants. Starting on July 13, 2020, up and until January 28, 2021, Defendants served four separate requests for documents on Plaintiffs. In total, the Aquilina Plaintiffs produced 53 documents totaling 221 pages and the Corrigan Plaintiffs produced 186 documents totaling 845 pages, all of which Class Counsel reviewed for responsiveness and privilege. In addition, Class Counsel produced 41 documents which were cited in the complaint totaling 637 pages.

43. On August 12, 2020, the Corrigan Plaintiffs responded to 59 requests for documents from Aloha. On November 2, 2020, the Corrigan Plaintiffs responded

to 15 interrogatories from Aloha. On November 19, 2020, the Corrigan Plaintiffs responded to 10 requests for admission from Aloha.

44. On September 11, 2020, the Corrigan Plaintiffs and Aquilina Plaintiffs separately responded to 51 and 39 requests for documents, respectively, from Underwriters.

45. On November 13, 2020, the Corrigan Plaintiffs and Aquilina Plaintiffs separately responded to 13 interrogatories, six requests for admission, and eight (Corrigan Plaintiffs) and seven (Aquilina Plaintiffs) requests for documents from Monarch. On December 28, 2020, the Corrigan Plaintiffs and Aquilina Plaintiffs separately amended their responses to Monarch's interrogatories, requests for admission, and requests for documents.

46. On March 19, 2021, the Aquilina Plaintiffs responded to 19 interrogatories, 29 requests for admission, and 27 requests for documents from Moa.

47. Plaintiffs provided substantial assistance that allowed Class Counsel to successfully prosecute and resolve this Litigation.

48. In addition, Class Counsel served several subpoenas on third parties, including the Hawaii Property Insurance Association, Big Island Video News, Worldwide Facilities, LLC, First Risk Management Services, Inc., Hull & Co., Inc., Risk Placement Services, Inc., Scottish American, and BOH Wholesale Insurance Agency, Inc.

### **III. SETTLEMENT NEGOTIATIONS WITH DEFENDANTS**

49. Beginning in January 2021, Plaintiffs and certain Defendants began informal settlement negotiations and exchanged proposals and counterproposals to resolve the entire litigation with all Defendants.

50. On March 26, 2021, Class Counsel and counsel for Defendants engaged in virtual mediation before mediator Keith Hunter of Dispute Prevention & Resolution, Inc. Thereafter, the Parties continued negotiations with Mr. Hunter's assistance and participated in numerous subsequent mediation calls with Mr. Hunter.

51. On April 7, 2021, Judge Mansfield held an early settlement conference. At that time, the Parties advised Judge Mansfield that they remained in productive mediation discussions with Mr. Hunter and would advise the Court if the Court's assistance with the ongoing settlement discussions was needed.

52. After exchanging numerous drafts, on June 1, 2021, the Parties executed a Terms Sheet memorializing the material terms to achieve global resolution of the Litigation.

53. Thereafter, the Parties continued to work on finalizing the remaining Settlement terms and notice documents and executed the Settlement Agreement on July 13, 2021 (ECF No. 405-3).



54. Following weeks of negotiations with counsel for Defendants, Plaintiffs moved for preliminary approval of the Settlement on July 13, 2021. ECF No. 405.

55. On July 22, 2021, the Court held oral argument and the Parties agreed to amend the Settlement to address the Court's concerns regarding various provisions of the Settlement. ECF No. 407.

56. On July 30, 2021, following the Court's directive at the oral argument, the Parties executed, and Plaintiffs filed a revised Settlement Agreement (ECF No. 408), which the Court preliminarily approved on August 13, 2021 (ECF No. 411).

57. Based upon my experience serving as lead counsel in numerous class action cases, and my role in other leadership positions, it is my opinion that the proposed Settlement is an excellent result and is fair, adequate, and reasonable pursuant to Fed. R. Civ. P. 23.

58. The fact that the Settlement provides Class Members with 100% of the premiums they paid during the Class Period, after deduction of proposed attorneys' fees, expenses and incentive awards is truly an excellent result and one that is not commonly obtained in litigation. Additionally, the fact that the Settlement also provides for certain Defendants to pay notice and administration costs on top of the payments into the Settlement Fund is likewise an excellent result.

#### **IV. CLASS COUNSEL'S TIME AND EXPENSES INCURRED IN THE PROSECUTION OF THE LITIGATION**

59. It is the firm's regular practice and policy that all firm lawyers and paralegals record any time devoted to firm matters on a computerized database program. Each professional is to record his or her time in tenth-of-an-hour increments and to do so as contemporaneously as possible with the expenditure of the time.

60. As explained in the Declaration of Daryl F. Scott filed concurrently herewith ("Scott Declaration"), the total number of recorded hours spent on this litigation, as of July 13, 2021, is 6,301.50 hours, and the total lodestar amount for attorney and support staff time is \$4,206,913.50. The rates charged are the firm's historical rates which have been approved by Courts in this Circuit and elsewhere.

61. Attached hereto as Exhibit A is a spreadsheet from my firm's accounting department showing the detailed records of the time devoted by my firm's professionals through July 13, 2021.

62. I have reviewed and approved the time and charges set forth in the itemization of work performed. The time reflected above was time actually spent, in the exercise of reasonable judgment, by the attorneys and staff involved in the prosecution of this Litigation. The time spent and expenses incurred were reasonable and necessary under the circumstances.

63. Exercising billing judgment, I removed the time of any timekeeper who billed approximately 10 hours or less on the case. I also did not include the time incurred related to my firm's present application for an award of attorneys' fees or time recorded after the Settlement Agreement was signed on July 13, 2021. I estimate that my firm has expended an additional 200 hours since the date the Settlement Agreement was executed.

64. Based on my experience, involvement in many complex class actions, and settlement of such actions throughout the United States, the hourly rates charged by my firm are within the range of rates charged by attorneys of equivalent experience and skill, who practice at firms involved in nationwide class action litigation.

65. Attached hereto as Exhibit B is a comprehensive table with Scott+Scott's lodestar, applying both the firm's historical hourly rates and adjusted Hawaii hourly rates based on similar hourly rates submitted and approved by Federal District Courts in Hawaii in other class action litigation, including *Martin v. Marriott Int'l, Inc.*, No. 1:18-cv-00494-JAO-RT, ECF No. 169-8 (D. Haw. Aug. 2, 2021), *Smith v. Bank of Hawaii*, No. 1:16-cv-00513-JMS-WRP, ECF No. 217-1 (D. Haw. Apr. 10, 2020), and *Sheehey v. Bhanot*, No. 1:13-cv-00663-LEK-KSC, ECF No. 390-1 (D. Haw. Mar. 30, 2018)) by timekeeper.

66. Class Counsel Wood Law Firm, LLC is not seeking any attorneys' fee award in this Litigation and Class Counsel is not seeking an attorneys' fee award on behalf of Foster Law Offices, who withdrew as counsel for Plaintiffs. ECF No. 402.

67. Throughout the case, Class Counsel made significant efforts toward the efficient allocation of work within the firm. I submit that Class Counsel conducted themselves in this action in a professional, diligent, and efficient manner. Class Counsel are highly respected and experienced leaders in the field of consumer class action litigation. Because the litigation involved separate briefing by four separate Defendants, Class Counsel did not have time to waste with any inefficiency in litigating.

68. My firm generally assigned initial drafting of complaints and briefs to associates, with editing done by partners. Overall, my firm assigned as much work as possible to attorneys with lower billing rates when feasible and appropriate to protect the interests of the Class.

69. The realities of the legal market for class action litigation require that the market rate for each attorneys' home market apply. Thus, based on the high degree of experience by Class Counsel in the area of consumer and class action litigation, I respectfully submit that it is appropriate to apply the market rates for each attorney's home market.

70. Given Class Counsel's total lodestar at their regular hourly rates and expenses, an award of 30% of the Settlement Fund requested in the Fee Application would result in a negative multiplier of approximately 0.13. A multiplier of less than one (or a negative or fractional multiplier) demonstrates that the requested fee is well within the range of reasonableness. Calculated at forum rates, Class Counsel's total lodestar would result in a multiplier of approximately 0.21. This adjusted requested multiplier is well in line with similarly requested multipliers that have been approved by the Ninth Circuit.

71. As explained in the Scott Declaration, Scott+Scott has incurred expenses in this Litigation that total \$223,839. All of the time and expense incurred in the Litigation are reflected in the books and records of Scott+Scott. The expenses in this Litigation are supported by vouchers, checks, time records, and other documents, contained in the books and records of Scott+Scott.

72. The attorneys' fees of Class Counsel Damon Key Leong Kupchak Hastert, LLC ("Damon Key Leong") are being submitted as a Litigation Expense, as Scott+Scott pays Damon Key Leong for its invoiced services as local counsel on a monthly basis. Scott+Scott paid Damon Key Leong \$6,250.79 for its invoiced services as local counsel on a monthly basis. Additionally, Damon Key Leong's estimated fees and expenses for work up until the final approval hearing are \$4,250,

and are being included in connection with Scott+Scott's expense reimbursement request.

## **V. FACTORS SUPPORTING THE REQUESTED FEE AWARD**

73. Here, Class Counsel seeks a fee award based on the establishment of a common fund from the Settlement. The retainer agreements with Plaintiffs were agreed to on a fully-contingent basis. Class Counsel agreed to advance all costs and expenses necessary to prosecute the Litigation. Indeed, my firm has received no compensation for their efforts and costs during the course of this Litigation. In agreeing to such an arrangement, Class Counsel took considerable risk, as there was no guarantee they would recoup their fees or costs. The expectations of each Plaintiff accordingly support the requested award.

74. Practice in consumer class action litigation requires skill, knowledge, and experience in two distinct subsets of the law: a) all states' consumer protection law; and b) class action law. In my experience, prosecuting these types of complex, consumer claims entail hard-fought and lengthy litigation. This is especially true where Defendants are represented by five respected law firms.

75. Class Counsel is not aware of any other similar class action litigation asserting comparable claims against insurers and retail brokers for improper sales of surplus lines insurance; therefore, extensive legal research and attention to detail in briefing was required to build the arguments set forth in the Litigation. Because

each Defendant briefed each motion individually, rather than filing a joint briefing, Class Counsel were required to devote additional time to respond to arguments raised by each of the Defendants, carefully briefing the nuanced issues that were raised by each Defendant.

76. There were substantial uncertainties in the viability of this case as a class action, as well as substantial uncertainties in the merits of the underlying claims. Although Class Counsel believed the case to be meritorious, a realistic assessment shows that the risks inherent in the resolution of the liability issues, protracted litigation in this action, as well as the probable appeals process, are great. If litigation were to continue, the case likely would shape up to be a battle of the experts, and thus, expert expenses would be substantial. The class certification decision likely would lead to the inevitable Rule 23(f) interlocutory appeal, potentially delaying prosecution of the case should a stay pending appeal be granted.

77. Had this Settlement not been reached, Defendants would have vigorously prosecuted this case up until and through trial. In addition, as described above, Class Counsel have advanced material expenses that may not have been reimbursed absent resolution.

78. In light of the number of hours worked on this action and dedication to achieving a successful result, it necessarily precluded my firm from pursuing other litigation opportunities.

## **VI. CONCLUSION**

For the reasons set forth above and in the accompanying memoranda of law, I respectfully submit that the Court should grant Plaintiffs' Motion for Attorneys' Fees, Litigation Expenses, and Service Awards.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of November, 2021 at New York, New York.

*s/ Joseph P. Guglielmo*  
Joseph P. Guglielmo



# **EXHIBIT A**

## Exhibit A to Declaration of Joseph P. Guglielmo

Date	Timekeeper	Hours	Description of Services Rendered
9/4/2018	Michelle Conston	2.00	Research re: possible RICO claims and unfair competition claims
9/5/2018	Michelle Conston	3.50	Research re: possible RICO claims and unfair competition claims
9/6/2018	Michelle Conston	3.50	Research re: possible RICO claims and unfair competition claims
9/10/2018	Michelle Conston	0.40	Communicate (in firm) with JG re: new facts for case.
9/10/2018	Michelle Conston	4.50	Research re: possible RICO claims and unfair competition claims; read case documents and email JG re: best cause of action
9/10/2018	Joe Guglielmo	0.70	Conf with K. Wood re possible claims. Research.
9/12/2018	Michelle Conston	0.20	Email with JG re: possible claims in the case
9/12/2018	Joe Guglielmo	0.20	Communicate (in firm) with MEC regarding possible claims in the case.
9/13/2018	Michelle Conston	0.60	Communicate (in firm) with JG re: possible claims and research.
9/13/2018	Joe Guglielmo	0.60	Conf with MEC re possible claims and research.
9/14/2018	Michelle Conston	0.20	Email with JG re: possible claims in the case
9/14/2018	Joe Guglielmo	0.20	Communicate (in firm) exchange emails with MEC re possible claims for the case.
9/17/2018	Michelle Conston	4.50	Research re: possible RICO claims and unfair competition claims
9/18/2018	Joe Guglielmo	0.50	Conf with MEC re draft and research for case.
9/18/2018	Michelle Conston	3.00	Research re: possible RICO claims and unfair competition claims.
9/18/2018	Michelle Conston	3.00	Research re: assessment of home values for possible plaintiffs.
9/19/2018	Joe Guglielmo	1.00	Conf with K. Wood re possible clients. Conf with MEC re draft complaint.
9/19/2018	Michelle Conston	0.50	Email JG re: case analysis and strategy
9/21/2018	Joe Guglielmo	0.40	Conf with K. Wood re client chart, review client info.
9/28/2018	Michelle Conston	7.50	Draft and revise complaint
10/2/2018	Joe Guglielmo	1.20	Conf with MC re research for complaint.
10/2/2018	Michelle Conston	1.20	Communicate (in firm) with JG re: research for complaint.
10/3/2018	Michelle Conston	0.60	Communicate (in firm) with JG re: status of complaint and research.
10/3/2018	Joe Guglielmo	1.20	Conf with MxC re status of complaint and research. Review cases re claims and causes of action.
10/4/2018	Joe Guglielmo	1.20	Review docs and conf with MxC re claims for case, client contracts.
10/4/2018	Michelle Conston	3.50	Research re: claim splitting; draft and revise email re: findings of claim splitting research and email to Joe Guglielmo.
10/4/2018	Michelle Conston	1.00	Draft and revise complaint.
10/5/2018	Michelle Conston	8.00	Draft and revise complaint

## Exhibit A to Declaration of Joseph P. Guglielmo

10/9/2018	Kaitlin Steinberger	0.80	Pulled all policy documents and correspondence for clients (x8) from file share database and saved to Sharepoint – emailed Joe G. and Michelle C. re same
10/9/2018	Michelle Conston	0.40	Case analysis and strategy with Joe Guglielmo.
10/9/2018	Michelle Conston	2.60	Research re: HPIA insurance.
10/9/2018	Michelle Conston	3.00	Draft and revise complaint.
10/9/2018	Joe Guglielmo	0.40	Communicate (in firm) with MEC regarding case analysis and strategy.
10/10/2018	Michelle Conston	4.50	Receipt and review of client documents
10/12/2018	Joe Guglielmo	1.40	Conf with MC re research for case. Review client docs.
10/12/2018	Michelle Conston	3.50	Receipt and review of client documents; create chart re: plaintiffs and circulate to Joe Guglielmo.
10/12/2018	Michelle Conston	3.00	Draft and revise complaint.
10/16/2018	Joe Guglielmo	2.00	Review info for new complaint, research.
10/17/2018	Michelle Conston	1.50	Draft and revise complaint
10/18/2018	Joe Guglielmo	1.60	Review research for complaint, conf with K. Wood, conf with MC.
10/18/2018	Michelle Conston	1.50	Case analysis and strategy with JG; draft and revise complaint
10/19/2018	Michelle Conston	1.50	Draft and revise complaint and circulate to JG
10/19/2018	Joe Guglielmo	2.20	Edits complaint, conf with MC.
10/22/2018	Michelle Conston	3.50	Draft and revise complaint; research re: plaintiff allegations
10/24/2018	Erin Green Comite	1.00	Revision of draft complaint.
10/25/2018	Erin Green Comite	2.00	Legal Research re claim splitting.
10/26/2018	Michelle Conston	1.50	Research re: Lloyd's income in Hawaii
10/29/2018	Erin Green Comite	0.80	Communicate (in firm) with J. Guglielmo and Michelle Conston regarding edits to complaint.
10/29/2018	Michelle Conston	1.50	Case analysis and strategy with JG; participate in telephone call with Kirk; type and revise notes of call
10/29/2018	Joe Guglielmo	0.80	Conf with MxC and EGC re edits to complaint.
10/30/2018	Joe Guglielmo	1.30	Conf with EGC re edits to complaint, research.
10/30/2018	Erin Green Comite	1.00	Communicate (in firm) with J. Guglielmo regarding edits to complaint.
10/31/2018	Erin Green Comite	0.30	Communicate (in firm) with J. Guglielmo regarding complaint edits.
10/31/2018	Michelle Conston	1.50	Research re: allegations in the complaint
10/31/2018	Joe Guglielmo	1.20	Edit complaint, conf with K. Wood. Conf with MxC and EGC re edits.
11/1/2018	Joe Guglielmo	1.00	Review docs from clients for case, conf with MEC.
11/1/2018	Michelle Conston	0.40	Communicate (in firm) with JG re: case updates.

## Exhibit A to Declaration of Joseph P. Guglielmo

11/6/2018	Michelle Conston	2.00	Draft and revise complaint.
11/6/2018	Michelle Conston	3.00	Research re: Hawaii Property Insurance Agency.
11/6/2018	Michelle Conston	0.50	Draft and revise email to Joe Guglielmo regarding the case.
11/6/2018	Joe Guglielmo	0.50	Edit complaint and research.
11/7/2018	Michelle Conston	2.10	Receipt and review of complaint in the Wieck insurance case.
11/7/2018	Michelle Conston	4.00	Draft and revise complaint.
11/8/2018	Joe Guglielmo	1.00	Edit complaint.
11/8/2018	Michelle Conston	0.60	Call with K. Wood re: insurance class action case.
11/8/2018	Michelle Conston	0.50	Case analysis and strategy with J. Guglielmo.
11/8/2018	Michelle Conston	5.20	Research re: Hawaii Property Insurance Association replacement cost estimator.
11/8/2018	Michelle Conston	0.20	Draft and revise email to K. Wood re: facts needed to add to class action complaint.
11/9/2018	Michelle Conston	1.00	Draft and revise complaint
11/11/2018	Joe Guglielmo	0.60	Conf with MEC and K. Wood re client info for complaint. Edit claims.
11/11/2018	Michelle Conston	0.30	Communicate (in firm) with JG and Karen Wood re: client information for the complaint.
11/12/2018	Joe Guglielmo	1.50	Edit complaint, research.
11/12/2018	Michelle Conston	3.50	Receipt and review of documents and emails re: possible lead plaintiffs.
11/12/2018	Michelle Conston	3.00	Research re: whether a surplus lines broker is exempted from HRS 480 because of HRS 431; draft and revise email to Joe Guglielmo re: results of research.
11/13/2018	Joe Guglielmo	1.60	Review docs and research claims. Conf with co counsel re related cases.
11/13/2018	Michelle Conston	3.20	Draft and revise complaint; research re: complaint
11/14/2018	Joe Guglielmo	1.60	Review docs and research claims. Conf with MEC re draft edits and client docs.
11/14/2018	Michelle Conston	0.30	Communicate (in firm) with JG re draft edits and client docs.
11/15/2018	Joe Guglielmo	1.00	Research for complaint.
11/19/2018	Joe Guglielmo	2.00	Edit complaint.
11/20/2018	Michelle Conston	1.50	Draft and revise complaint; email K. Wood regarding facts needed for class action complaint; research re: replacement values of plaintiffs' homes
11/21/2018	Joe Guglielmo	1.20	Research and edit complaint.
11/23/2018	Joe Guglielmo	1.50	Review and research complaint.
11/23/2018	Joe Guglielmo	1.20	Edit complaint, conf with K. Wood, review facts.
11/24/2018	Joe Guglielmo	0.80	Conf with MxC and EGC re edits to complaint.
11/24/2018	Erin Green Comite	0.80	Communicate (in firm) with J. Guglielmo regarding edits to complaint.
11/24/2018	Michelle Conston	0.80	Communicate (in firm) with JG and EGC re edits to complaint.

## Exhibit A to Declaration of Joseph P. Guglielmo

11/25/2018	Michelle Conston	2.50	Draft and revise party allegations for complaint; research re: Lloyd's syndicates
11/25/2018	Erin Green Comite	2.00	Revision of complaint.
11/25/2018	Joe Guglielmo	1.30	Conf with EGC re edits to complaint, research.
11/26/2018	Erin Green Comite	2.00	Telephone call with with J. Guglielmo re theory of the case.
11/26/2018	Joe Guglielmo	1.00	Research claims for complaint, research.
11/26/2018	Michelle Conston	2.50	Draft and revise complaint.
11/26/2018	Michelle Conston	2.00	Research re: complaint.
11/27/2018	Michelle Conston	1.00	Draft and revise complaint; research re: complaint
11/27/2018	Joe Guglielmo	1.00	Research for claims, conf with EGC.
11/27/2018	Erin Green Comite	2.00	Legal Research re complaint allegations.
11/28/2018	Joe Guglielmo	1.50	Research claims for complaint, review Ps docs.
11/28/2018	Michelle Conston	1.00	Draft and revise complaint; research re: complaint
11/29/2018	Michelle Conston	1.50	Research re: complaints related to insurance broker steering
11/29/2018	Joe Guglielmo	1.40	Conf with EGC re research for claims re Lloyds.
11/29/2018	Erin Green Comite	1.40	Communicate (in firm) with J. Guglielmo regarding research for claim regarding Lloyds.
11/30/2018	Erin Green Comite	8.00	Legal Research re complaint allegations.
11/30/2018	Michelle Conston	2.50	Research re: potential plaintiff; draft and revise email with cost replacement value of possible plaintiffs' homes and circulate to J. Guglielmo and E. Comite; research and circulate HRS to J. Guglielmo and E. Comite
11/30/2018	Joe Guglielmo	0.40	Review and edit complaint, conf with EGC.
12/1/2018	Erin Green Comite	4.00	Revision of complaint.
12/1/2018	Michelle Conston	1.00	Research re: unjust enrichment claims in Hawaii; draft and revise email re: same.
12/1/2018	Michelle Conston	1.00	Research re: statutes of limitations for various claims alleged in the case.
12/1/2018	Michelle Conston	1.50	Research re: prohibitions under HRS 481A; draft and revise email re: same.
12/2/2018	Joe Guglielmo	5.20	Review and edit complaint.
12/3/2018	Joe Guglielmo	0.50	Review and edit complaint, conf with MEC.
12/3/2018	Erin Green Comite	8.00	Revision of complaint.
12/3/2018	Kaitlin Steinberger	2.30	Checked D. Haw. local rules re opening case and initial complaint filing; draft civil cover sheet and summonses – ran locates re address for summons; emailed drafts to Michelle C.
12/3/2018	Michelle Conston	2.50	Research re: potential plaintiffs in action; edit complaint;

## Exhibit A to Declaration of Joseph P. Guglielmo

12/4/2018	Kaitlin Steinberger	0.20	Inserted edits to civil cover sheet – emailed revised version to Michelle C. for review
12/4/2018	Erin Green Comite	6.50	Revision of complaints.
12/5/2018	Kaitlin Steinberger	3.50	Formatted, proofed, and quote checked complaint
12/6/2018	Erin Green Comite	0.30	Communicate (in firm) with J. Guglielmo regarding draft complaint.
12/6/2018	Michelle Conston	2.00	Research re: relief under HRS §481A-4.
12/6/2018	Michelle Conston	3.50	Draft and revise complaint.
12/6/2018	Michelle Conston	1.00	Participate in telephone call with co-counsel re: case.
12/6/2018	Joe Guglielmo	0.40	Conf w MEC re edits to complaint, conf w EGC re draft.
12/6/2018	Kaitlin Steinberger	0.50	Attempted to pull and print more legible facebook posts by defendant Moa Insurance – TC with Michelle C. re same
12/7/2018	Joe Guglielmo	0.40	Conf w co counsel, conf w EGC re edits to complaint.
12/7/2018	Michelle Conston	4.00	Research re: relief under HRS §481A-4.
12/7/2018	Michelle Conston	4.00	Draft and revise complaint.
12/7/2018	Michelle Conston	0.50	Draft and revise email to Joe Guglielmo and Erin Comite re: research.
12/7/2018	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo regarding edits to complaint.
12/8/2018	Joe Guglielmo	0.50	Conf w co counsel re edits to complaint and research . Edit complaint.
12/12/2018	Michelle Conston	0.30	Communicate (in firm) with JG and Karen Wood regarding claims for case.
12/12/2018	Joe Guglielmo	1.30	Review facts and develop claims for case, conf with K. Wood and MEC.
12/14/2018	Joe Guglielmo	0.40	Conf with MEC re addl facts for complaint.
12/14/2018	Michelle Conston	0.40	Communicate (in firm) with JG re additional facts for the complaint.
12/17/2018	Joe Guglielmo	1.00	Review and edit complaint, conf with K. Wood re client allegations.
12/17/2018	Michelle Conston	3.50	Draft and revise complaint; research re: potential plaintiffs
12/18/2018	Michelle Conston	3.50	Draft and revise complaint; research re: language used in insurance policies of class members
12/18/2018	Erin Green Comite	3.00	Revision of complaint.
12/18/2018	Joe Guglielmo	1.70	Review and research facts for case, conf with K. Wood and MEC re investigation and claims.
12/19/2018	Joe Guglielmo	0.30	Conf w K. Wood re client calls.
12/19/2018	Erin Green Comite	6.00	Revision of complaint.
12/19/2018	Michelle Conston	2.50	Research re: interpretation of “volcanic eruption” in an insurance policy; participate in telephone call with client
12/20/2018	Michelle Conston	1.00	Participate in telephone call with client

## Exhibit A to Declaration of Joseph P. Guglielmo

12/20/2018	Erin Green Comite	4.00	Revision of complaint.
12/20/2018	Joe Guglielmo	1.40	Rev facts and amend complaint, conf w EGC and MEC. Conf w K. Wood, J Foster re client facts and legal claims. .
12/21/2018	Erin Green Comite	4.00	Revision of complaint.
12/21/2018	Michelle Conston	0.50	Research re: Hawaii Revised Statutes
12/21/2018	Joe Guglielmo	2.20	Rev and finalize complaint for filing, conf w EGC, MEC and K. Wood.
12/27/2018	Joe Guglielmo	0.40	Conf w co counsel re facts for case.
12/29/2018	Joe Guglielmo	0.60	Rev docs for new clients for complaint.
1/2/2019	Kaitlin Steinberger	0.80	Drafted pro hac motions for Joe G., Erin C., and Michelle C. – emailed to Michelle C. for review
1/2/2019	Michelle Conston	0.20	Coordinate pro hac vice motions for case
1/2/2019	Joe Guglielmo	0.40	Conf with MEC re pro hac and new client info.
1/3/2019	Kaitlin Steinberger	0.40	Emailed executed pro hacs to local and co-counsel – requited same be executed by local counsel; completed ECF registration form for Michelle C.; upon receipt of fully executed versions, filed Joe G.'s and Erin C.'s motions via ECF in D. Haw.; submitted Mi
1/4/2019	Kaitlin Steinberger	0.20	Emails to/from ECF clerk re Michelle C. registration; emails to/from local re filing Michelle C.'s pro hac motion
1/8/2019	Joe Guglielmo	0.30	Conf with co counsel re claims.
1/8/2019	Erin Green Comite	0.20	Communicate (in firm) with Michelle Conston regarding potential plaintiffs.
1/8/2019	Michelle Conston	1.00	Review documents for potential plaintiffs and email Joe and Erin re: findings
1/9/2019	Joe Guglielmo	0.40	Conf with co counsel, edit press release and related case.
1/11/2019	Joe Guglielmo	0.30	Communicate (in firm) with Mike Burnett regarding case material.
1/14/2019	Joe Guglielmo	0.30	Review docs for new clients for complaint.
1/14/2019	Michelle Conston	0.50	Participate in telephone call with potential plaintiff
2/5/2019	Michelle Conston	0.50	Receipt and review of proposed protective order
2/6/2019	Michelle Conston	0.40	Participate in telephone call with co-counsel re: potential plaintiffs
2/8/2019	Joe Guglielmo	0.50	Review service and stip.
2/8/2019	Michelle Conston	0.50	Draft and revise stipulation with Borisoff and Lloyd's re: service
2/13/2019	Michelle Conston	1.50	Draft and revise LR 16.2 statement; research re: LR 16.2 statements in the District of Hawaii
2/14/2019	Michelle Conston	0.30	Receipt and review of Lloyd's edits to stipulation re: service
2/18/2019	Michelle Conston	0.10	Finalize stipulation with Defendants Lloyd's and Borisoff

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2/19/2019	Irina Chilaia	1.50	Review the docket, individual rules of Hawaii district court re formatting, proofread/edits to the stipulation and email to Michelle C.
2/22/2019	Michelle Conston	1.00	Research re: prior scheduling conference statements filed in Judge Mansfield's cases; research re: class actions in front of Judge Mansfield
2/23/2019	Michelle Conston	0.80	Draft and revise LR 16.2 statement; research re: LR 16.2 statements in the District of Hawaii
2/25/2019	Joe Guglielmo	0.40	Review and edit stip for service/extension of time
2/25/2019	Michelle Conston	0.30	Case analysis and strategy with JG
2/26/2019	Joe Guglielmo	0.60	Review and edit stip for service/extension of time.
2/27/2019	Kaitlin Steinberger	0.60	Formatted/proofed joint stip. re service; finalized and filed via ECF in D. Haw.; emailed word version to court clerk
2/27/2019	Michelle Conston	0.20	Draft and revise stipulation with defendants Moa and Pyramid; finalize stipulation with Borisoff and Lloyd's
2/27/2019	Erin Green Comite	2.00	Drafting RFPs
3/1/2019	Michelle Conston	1.10	Refile stipulation re: service; draft and revise scheduling conference statement
3/1/2019	Kaitlin Steinberger	0.30	Edits to joint stip. re service – resubmitted word version to chambers via email
3/4/2019	Joe Guglielmo	0.50	Review rule 26 report draft.
3/4/2019	Joe Guglielmo	0.40	Conf with Ds re mandiant docs, conf with Mandiant re subpoena.
3/5/2019	Michelle Conston	3.00	Draft and revise stipulation and circulate to defendants; email defense counsel re: scheduling Rule 26(f) conference; draft and revise to-do list and circulate to team; draft and revise Rule 26(f) statement
3/5/2019	Erin Green Comite	1.50	Review of case status and Rule 16 statement draft.
3/6/2019	Kaitlin Steinberger	1.30	Created list of which attorneys/firms have appeared for each defendant; formatted/proofed service stipulation
3/6/2019	Joe Guglielmo	0.40	Conf with MEC and EGC re Lloyds Rule 26 draft report.
3/6/2019	Erin Green Comite	1.00	Review of case status.
3/6/2019	Michelle Conston	0.30	Case analysis and strategy with EGC; finalize stipulation and email to defendants
3/7/2019	Michelle Conston	3.50	Receipt and review of Defendants' motions to dismiss; draft and revise template for opposition briefing; email with defense counsel re: stipulation
3/7/2019	Erin Green Comite	1.00	Review of case status.
3/7/2019	Kaitlin Steinberger	0.30	Inserted edits to service stipulation
3/8/2019	Michelle Conston	1.50	Draft and revise Rule 26(f) statement
3/10/2019	Erin Green Comite	2.00	Review of Rule 16 report draft and Rule 26f Report draft.



## Exhibit A to Declaration of Joseph P. Guglielmo

3/11/2019	Kaitlin Steinberger	1.40	Started research re all articles concerning our case and state court cases; checked service status of unrepresented defendants; checked motion to dismiss response deadlines
3/11/2019	Michelle Conston	0.50	Draft and revise Rule 26(f) statement and send to the defendants
3/11/2019	Erin Green Comite	1.50	Finalize Rule 16 and Rule 26f reports.
3/13/2019	Michelle Conston	1.00	Finalize and file stipulation; receipt and review of HO-3 policy of potential plaintiff and email JG and EGC recommendation
3/13/2019	Kaitlin Steinberger	0.50	Edits to stipulation re service; finalized and filed same via ECF in D. Haw.; emailed word version to clerk
3/15/2019	Michelle Conston	0.30	Communicate (in firm) with JG regarding MTD.
3/15/2019	Joe Guglielmo	1.30	Review and edit rule 26 report. Conf with MEC re MTD. Review Rule 16 report.
3/19/2019	Michelle Conston	2.50	Draft and revise to-do list and circulate to team; participate in FRCP 26(f) conference with defendants; draft and revise notes of meeting with defendants
3/19/2019	Joe Guglielmo	1.50	Rule 26 conf with Ds, prep with MEC.
3/19/2019	Kaitlin Steinberger	1.00	Finished research re all articles concerning our case and state court cases
3/20/2019	Michelle Conston	0.80	Draft and revise Rule 26(f) statement
3/21/2019	Joe Guglielmo	0.60	Conf with EGC and MEC re edits to Rule 26 report.
3/21/2019	Michelle Conston	0.60	Communicate (in firm) with JG and EGC regarding edits to Rule 26 report.
3/21/2019	Erin Green Comite	0.60	Communicate (in firm) with J. Guglielmo and Michelle Conston regarding edits to Rule 26 report.
3/22/2019	Erin Green Comite	2.00	Review of Rule 26f Report; review of motions to dismiss.
3/25/2019	Erin Green Comite	2.00	Review of motions to dismiss.
3/25/2019	Joe Guglielmo	2.20	Edit RFPS to defendants.
3/26/2019	Michelle Conston	0.20	Communicate (in firm) with JG and EGC regarding Rule 26.
3/26/2019	Erin Green Comite	6.00	Legal Research re motion to dismiss.
3/26/2019	Joe Guglielmo	1.20	Rule 26 call with Ds, edit schedule. Conf with MEC, EGC.
3/26/2019	Joe Guglielmo	1.00	Edits to RFPs.
3/27/2019	Kaitlin Steinberger	1.10	Formatted/proofed first request for interrogatories and production of documents
3/27/2019	Joe Guglielmo	1.30	Edits to Rule 16 status report. Conf with MEC.
3/27/2019	Justin Batten	4.20	Reading complaint and motions to dismiss; meeting with JPG to discuss case; reading online articles about insurance coverage
3/27/2019	Erin Green Comite	6.00	Legal Research re motion to dismiss.

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3/27/2019	Michelle Conston	0.30	Communicate (in firm) with JG regarding case updates.
3/28/2019	Michelle Conston	0.30	Communicate (in firm) with JG regarding Rule 26, conference with JWBA to discuss case updates.
3/28/2019	Erin Green Comite	1.00	Review of RFPs.
3/28/2019	Joe Guglielmo	0.40	Review edits to Rule 26 report, conf with MEC.
3/28/2019	Justin Batten	1.70	Reading news coverage of event; meeting with MEC to discuss case
3/28/2019	Kaitlin Steinberger	1.10	Formatted/proofed Rule 16 statement
3/29/2019	Kaitlin Steinberger	2.70	Formatted/proofed Rule 26(f) report; finalized and filed Rule 16 and Rule 26(f) reports via ECF in D. Haw.
3/29/2019	Joe Guglielmo	2.20	Edit Rule 26 report, conf with MEC.
3/29/2019	Joe Guglielmo	0.30	Review info for new client, conf with K. Wood.
3/29/2019	Michelle Conston	2.50	email with defendants re: Rule 26 statement; finalize Rule 16 conference statement for filing; finalize rule 26 statement for filing
3/29/2019	Erin Green Comite	3.00	Legal Research re motion to dismiss.
4/1/2019	Joe Guglielmo	1.50	Research HRS 480-2 Underwriters' and Monarch's MTD.
4/1/2019	Erin Green Comite	4.00	Legal Research to Monarch's and Underwriters' MTD opposition briefs.
4/1/2019	Michelle Conston	0.80	Draft and revise protective order; draft and revise to-do list for case
4/1/2019	Michelle Conston	4.50	Participate in telephone call regarding Defendants' motions to dismiss; research re: motion to dismiss
4/2/2019	Joe Guglielmo	0.30	Edit discovery, conf with Ds re scheduling.
4/2/2019	Michelle Conston	1.30	Communicate (in firm) with JG regarding case updates; meeting with JWBA regarding strategy for responding to Underwriters' and Monarch's MTD.
4/2/2019	Erin Green Comite	6.50	Legal Research re Monarch's and Underwriters' MTD opposition briefs.
4/2/2019	Justin Batten	1.20	Meeting with JPG, MEC, and EGC to discuss strategy for responding to Underwriters' and Monarch's MTD.
4/2/2019	Joe Guglielmo	1.40	Conf with K. Wood re addl clients and new complaint, research for Underwriters' and Monarch's MTD opp., conf with EGC and MEC.
4/3/2019	Justin Batten	4.60	Research on opposing Underwriters' and Monarch's motion to dismiss.
4/3/2019	Erin Green Comite	7.00	Legal Research re Monarch's and Underwriters' MTD opposition briefs.

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4/3/2019	Justin Batten	0.90	Call with EGC to discuss research assignment
4/3/2019	Kaitlin Steinberger	0.80	Formatted/proofed stipulated protective order
4/3/2019	Michelle Conston	0.20	Finalize protective order and email to defense counsel
4/4/2019	Erin Green Comite	7.00	Revision of RFPs and legal research re Monarch's and Underwriters' MTD opposition briefs.
4/4/2019	Justin Batten	3.40	Research on opposing Underwriters' and Monarch's motion to dismiss.
4/5/2019	Justin Batten	6.60	Research on opposing Underwriters' and Monarch's motion to dismiss.
4/5/2019	Michelle Conston	6.20	Research re: Underwriters' and Monarch's motion to dismiss; draft and revise memorandum re: research
4/5/2019	Erin Green Comite	4.00	Revision of RFPs and legal research re Monarch's and Underwriters' MTD opposition briefs.
4/5/2019	Joe Guglielmo	0.20	Conf with Ds re scheduling.
4/5/2019	Joe Guglielmo	1.20	Edit RFPs. Conf with EGC.
4/6/2019	Justin Batten	2.50	Research on opposing Underwriters' and Monarch's motion to dismiss.
4/7/2019	Justin Batten	4.90	Research on opposing Underwriters' and Monarch's motion to dismiss.
4/8/2019	Justin Batten	9.00	Research on opposing Underwriters' and Monarch's motion to dismiss.
4/8/2019	Michelle Conston	7.20	Research re: Underwriters' and Monarch's motion to dismiss; draft and revise memorandum re: research
4/8/2019	Erin Green Comite	7.00	Revision of RFPs.
4/9/2019	Kaitlin Steinberger	1.80	Formatted/proofed requests for production of documents; formatted/proofed letter to judge re hearing adjournment– inserted edits; inserted edits to letter – finalized and filed via ECF in D. Haw.
4/9/2019	Michelle Conston	8.00	Research re: Underwriters' and Monarch's motion to dismiss; draft and revise memorandum re: research
4/9/2019	Justin Batten	6.70	Research on opposing Underwriters' and Monarch's motion to dismiss.

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4/10/2019	Justin Batten	3.70	Preparing memo of research findings in opposition to Underwriters' and Monarch's motion to dismiss.
4/10/2019	Michelle Conston	5.50	Research re: Underwriters' and Monarch's motion to dismiss; draft and revise memorandum re: research
4/10/2019	Kaitlin Steinberger	0.30	Edits to first RFPs; finalized and distribute to all counsel via email
4/11/2019	Justin Batten	4.90	Preparing memo of research findings in opposition to Underwriters' and Monarch's motion to dismiss.
4/12/2019	Joe Guglielmo	1.10	Review Underwriters' and Monarch's MTD.
4/12/2019	Justin Batten	0.30	Revising unjust enrichment memo and distributing and loading to Sharepoint
4/17/2019	Michelle Conston	0.50	Email with defendants re: protective order; receipt and review of defendants' edits to the protective order
4/19/2019	Justin Batten	5.20	Research on unjust enrichment case law
4/20/2019	Justin Batten	2.40	Research on unjust enrichment case law
4/22/2019	Michelle Conston	0.20	Communicate (in firm) with JG regarding scheduling issues.
4/22/2019	Joe Guglielmo	1.50	Review Underwriters' and Monarch's MTD and conf with MEC re scheduling issues.
4/22/2019	Erin Green Comite	3.00	Review of settlement and releases in Lincoln Adventures.
4/23/2019	Irina Chilaia	3.50	Review docket, proofread/edits to the stipulation, check the Court's local rules, judge's local rules, e-file the stip. and email to J. the word version for signature
4/23/2019	Joe Guglielmo	1.50	Review Underwriters' and Monarch's MTD and conf with MEC re scheduling issues.
4/23/2019	Michelle Conston	0.20	Communicate (in firm) with JG regarding scheduling issues.
4/24/2019	Joe Guglielmo	1.20	Review and edit discovery schedule. Review Moa's and Pyramid's MTD. Conf re stip to move hearing dates.
4/24/2019	Erin Green Comite	1.00	Telephone call with J. Guglielmo re Lincoln Adventures settlement.
4/24/2019	Justin Batten	0.20	Reading Moa and Pyramid motions to dismiss

## Exhibit A to Declaration of Joseph P. Guglielmo

4/25/2019	Justin Batten	0.70	Reading Moa and Pyramid motionS to dismiss
4/25/2019	Joe Guglielmo	1.40	Prep for conf re Rule 26 and discovery status.
4/25/2019	Joe Guglielmo	0.70	Review discovery and conf with MEC.
4/25/2019	Michelle Conston	0.20	Communicate (in firm) with JG regarding discovery.
4/29/2019	Michelle Conston	0.50	Draft and revise Rule 16 conference outline; email defendants re: consolidating hearings
4/29/2019	Erin Green Comite	2.00	Review of and edit outline for status conference.
4/30/2019	Michelle Conston	0.50	Draft and revise Rule 16 conference outline
5/6/2019	Michelle Conston	1.30	Participate in conference call in preparation for Rule 15 conference; draft and revise Rule 26(a)(1) disclosures
5/6/2019	Justin Batten	0.20	Reading news article in Hawaii Tribune Herald re litigation update
5/6/2019	Erin Green Comite	0.80	Attention to courtesy copy issue.
5/6/2019	Kaitlin Steinberger	0.40	Arranged printing and delivery of courtesy copies to the judge
5/6/2019	Joe Guglielmo	1.30	Prep with K. Wood and MEC re status hearing, discovery.
5/7/2019	Joe Guglielmo	0.30	Conf with K. Wood re status hearing.
5/7/2019	Kaitlin Steinberger	1.30	Drafted cert of service for Rule 26(a)(1) disclosures; finalized and filed via ECF in D. Haw.; prepared and mailed hard copies of disclosers and cert. of service to defense counsel
5/7/2019	Erin Green Comite	0.80	Attention to certificate of service issue.
5/7/2019	Michelle Conston	0.30	Draft and revise letter to the court re: consolidation of motion to dismiss oral argument dates
5/10/2019	Joe Guglielmo	0.80	Review ESI protocol, conf with MEC.
5/10/2019	Michelle Conston	0.20	Communicate (in firm) with JG regarding ESI protocol.
5/14/2019	Michelle Conston	1.00	Draft and revise ESI protocol
5/15/2019	Joe Guglielmo	0.60	Review ESI protocol and letter motion to adjourn hearing.
5/16/2019	Justin Batten	0.20	Reading and distributing Hawaii Tribune Herald article on state court case
5/17/2019	Michelle Conston	0.50	Draft and revise client preservation letter
5/20/2019	Irina Chilaia	2.50	Start proofreading/edits to Stip and Proposed order for establishing the protocol for the production of docs and ESI
5/20/2019	Joe Guglielmo	0.90	Conf with MEC re preservation letter to clients. Edit ESI protocol.

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5/20/2019	Michelle Conston	0.30	Communicate (in firm) with JG regarding preservation letters to clients.
5/21/2019	Michelle Conston	0.80	Draft and revise ESI Protocol and circulate to team
5/21/2019	Irina Chilaia	1.00	Finalize proofreading, enter remaining edits in redline and email to Michelle C. for review
5/22/2019	Irina Chilaia	2.50	Finalize the stipulation, multiple email correspondence with Michelle C. re same
5/22/2019	Michelle Conston	0.50	Draft and revise client preservation letter and send to co-counsel
5/23/2019	Joe Guglielmo	0.60	Review and edit letter to court re service.
5/31/2019	Michelle Conston	0.10	Finalize letter to Court for filing
5/31/2019	Kaitlin Steinberger	0.80	Formatted/proofed letter to judge re consolidating MTD hearing; inserted edits to same; finalized and filed via ECF in D. Haw.
6/3/2019	Michelle Conston	0.20	email defense counsel re: ESI protocol
6/4/2019	Joe Guglielmo	1.00	Conf with K. Wood re possible mediation. Conf with co counsel.
6/4/2019	Michelle Conston	0.10	calendar dates re: MTD deadlines
6/6/2019	Joe Guglielmo	0.20	Conf with K. Wood re possible mediation.
6/10/2019	Joe Guglielmo	0.20	Conf with Ds re status.
6/13/2019	Joe Guglielmo	0.20	Conf with Ds re possible mediation.
6/27/2019	Joe Guglielmo	0.30	Conf with K. Wood re related case and status of mediation.
7/4/2019	Justin Batten	2.00	Reading motions to dismiss
7/8/2019	Michelle Conston	0.30	Communicate (in firm) with JG, EGC and JWBA regarding opposition to MTD.
7/8/2019	Joe Guglielmo	0.30	Communicate (in firm) with EGC, MEC and JWBA regarding opposition to MTD.
7/8/2019	Erin Green Comite	8.00	Legal Research re MTD Opp.
7/8/2019	Justin Batten	1.30	Call with MEC, EGC, and JPG to discuss opposition to MTD; prep for call; typing notes from earlier meeting
7/8/2019	Justin Batten	3.30	Drafting brief in opposition to MTD
7/9/2019	Justin Batten	3.20	Drafting brief in opposition to MTD (unjust enrichment section)
7/9/2019	Erin Green Comite	8.00	Legal Research re Monarch's and Underwriters' MTD Opp.
7/9/2019	Joe Guglielmo	0.50	Conf with EGC and JWBA re cases for Monarch's and Underwriters' MTD Opp.

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7/10/2019	Justin Batten	1.10	Research HRS 480-2 for brief in opposition to Monarch's and Underwriters' MTD.
7/10/2019	Erin Green Comite	5.00	Legal Research re Monarch's and Underwriters' MTD Opp.
7/10/2019	Joe Guglielmo	0.20	Conf with K. Wood re case and possible mediation.
7/11/2019	Erin Green Comite	8.00	Legal Research re Monarch's and Underwriters' MTD Opp.
7/11/2019	Joe Guglielmo	0.50	Review cases for Monarch's and Underwriter's MTD Opp.
7/11/2019	Justin Batten	5.30	Research HRS 480-2 for brief in opposition to Monarch's and Underwriters' MTD.
7/12/2019	Justin Batten	2.80	Reading state court case opposition briefs; research in opposition to Monarch's and Underwriters' MTD.
7/12/2019	Joe Guglielmo	0.30	Review cases for Monarch's and Underwriters' MTD Opp.
7/12/2019	Erin Green Comite	5.00	Legal Research re Monarch's and Underwriters' MTD Opp.
7/14/2019	Justin Batten	3.90	Research for brief in opposition to Monarch's and Underwriters' MTD (unjust enrichment cases).
7/15/2019	Erin Green Comite	4.00	Drafting inserts for Monarch's and Underwriters' MTD Opp.
7/15/2019	Justin Batten	0.60	Research for brief in opposition to Monarch's and Underwriters' MTD (unjust enrichment cases).
7/16/2019	Michelle Conston	2.00	Research re: opposition to defendants' motions to dismiss.
7/16/2019	Michelle Conston	1.50	Draft and revise opposition to motion to dismiss.
7/16/2019	Erin Green Comite	4.00	Drafting inserts for Monarch's and Underwriters' MTD Opp.
7/16/2019	Justin Batten	2.90	Research for brief in opposition to MTD (unjust enrichment cases)
7/17/2019	Erin Green Comite	5.00	Drafting sections of Monarch's and Underwriters' MTD opposition brief.
7/17/2019	Joe Guglielmo	1.00	Research HRS 480-2 for OPP to Monarch's and Underwriters' MTD.
7/17/2019	Michelle Conston	3.00	Research re: opposition to defendants' motions to dismiss.
7/17/2019	Michelle Conston	1.50	Draft and revise opposition to motion to dismiss.
7/17/2019	Michelle Conston	0.50	Case analysis and strategy with Joe Guglielmo.
7/17/2019	Michelle Conston	0.50	Case analysis and strategy with Erin Comite.

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7/18/2019	Michelle Conston	4.00	Draft and revise opposition to motion to dismiss.
7/18/2019	Michelle Conston	4.00	Research re: HRS 480-2.
7/18/2019	Joe Guglielmo	0.50	Research HRS 480-2 for OPP to Monarch's and Underwriters' MTD.
7/18/2019	Erin Green Comite	6.00	Legal Research and drafting sections of Monarch's and Underwriters' MTD opposition brief.
7/19/2019	Erin Green Comite	5.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
7/19/2019	Joe Guglielmo	1.50	Conf with MEC re draft opp. to Monarch's and Underwriters' MTD.
7/19/2019	Michelle Conston	0.50	Draft and revise opposition to motion to dismiss.
7/19/2019	Michelle Conston	1.00	Research re: HRS 480-2.
7/19/2019	Michelle Conston	1.50	Case analysis and strategy with Joe Guglielmo and Erin Comite.
7/19/2019	Justin Batten	0.20	Call with EGC about opposition brief drafting
7/20/2019	Erin Green Comite	8.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
7/21/2019	Erin Green Comite	6.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
7/21/2019	Joe Guglielmo	2.00	Research HRS 480-2 for OPP to Monarch's and Underwriters' MTD.
7/21/2019	Michelle Conston	8.50	Draft and revise opposition to Monarch's and Underwriters' motion to dismiss.
7/22/2019	Joe Guglielmo	1.30	Research negligence for OPP to Monarch's and Underwriters' MTD.
7/22/2019	Michelle Conston	2.10	Draft and revise opposition to motion to dismiss.
7/22/2019	Michelle Conston	3.00	Research re: negligence claims in Hawaii.
7/22/2019	Michelle Conston	3.00	Research re: breach of fiduciary duty claim in Hawaii.
7/22/2019	Erin Green Comite	8.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
7/23/2019	Michelle Conston	3.10	Draft and revise opposition to motion to dismiss.
7/23/2019	Michelle Conston	3.00	Research re: negligence claims in Hawaii.
7/23/2019	Michelle Conston	3.20	Research re: breach of fiduciary duty claim in Hawaii.
7/23/2019	Erin Green Comite	7.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
7/23/2019	Joe Guglielmo	0.60	Research breach of fiduciary duty for OPP to Monarch's and Underwriters' MTD.
7/24/2019	Justin Batten	1.20	Call with MEC and EGC to discuss drafting and research for opposition briefs



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7/24/2019	Justin Batten	2.00	Research on insurance brokers and agents
7/24/2019	Erin Green Comite	8.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
7/24/2019	Michelle Conston	2.10	Draft and revise opposition to motion to dismiss.
7/24/2019	Michelle Conston	3.00	Research re: agency relationship.
7/24/2019	Michelle Conston	3.50	Research re: breach of fiduciary duty claim in Hawaii.
7/24/2019	Michelle Conston	0.50	Case analysis and strategy with Erin Comite and Justin Batten.
7/25/2019	Erin Green Comite	8.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
7/25/2019	Justin Batten	3.80	Research on insurance brokers and agents; reading latest draft opposition brief
7/26/2019	Justin Batten	2.60	Research on suits against Lloyds
7/26/2019	Michelle Conston	2.50	Draft and revise opposition to Monarch's motion to dismiss.
7/26/2019	Michelle Conston	2.00	Receipt and review of Monarch's case law cited in support of their motion to dismiss.
7/26/2019	Michelle Conston	2.00	Research re: breach of fiduciary duty claim against an insurer.
7/27/2019	Erin Green Comite	4.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
7/27/2019	Justin Batten	2.00	Research on insurance brokers and agents; reading latest draft opposition brief
7/28/2019	Michelle Conston	4.50	Draft and revise opposition to Monarch's motion to dismiss; receipt and review of Monarch's case law cited in support of their motion to dismiss
7/28/2019	Justin Batten	5.00	Research negligence and unjust enrichment for opposition to Monarch's and Underwriters' MTD.
7/29/2019	Erin Green Comite	4.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
7/29/2019	Joe Guglielmo	1.60	Research HRS 480-2 for opp to Monarch's and Underwriters' MTD. Conf with EGC and draft facts.
7/29/2019	Justin Batten	2.90	Reviewing similar cases against Lloyd's of London

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7/29/2019	Justin Batten	2.80	Research case law against insurance brokers
7/29/2019	Michelle Conston	3.00	Draft and revise opposition to Monarch's motion to dismiss; research re: 481A
7/30/2019	Joe Guglielmo	1.40	Research claims for opp, conf with EGC.
7/30/2019	Justin Batten	3.40	Research unjust enrichment case law
7/30/2019	Erin Green Comite	8.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
7/31/2019	Michelle Conston	6.10	Draft and revise opposition to Monarch's and Underwriters' motion to dismiss; case analysis and strategy with JG; case analysis and strategy with JB, EGC, and JG
7/31/2019	Justin Batten	6.00	Research in opposition to Monarch's and Underwriters' MTD; draft sections of brief; meeting with EGC, JPG, and MEC to discuss draft of brief; research surplus lines insurance regs in other states
7/31/2019	Erin Green Comite	8.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
7/31/2019	Joe Guglielmo	3.00	Research 481A and 480-2 claims. Conf with EGC. Research breach of fiduciary duty claims and draft facts.
7/31/2019	Kaitlin Steinberger	1.00	Started preparing summonses for service of complaint on Sackler defendants
7/31/2019	Michelle Conston	2.50	Case analysis and strategy with JG; research re: fiduciary duty
8/1/2019	Justin Batten	5.30	Reading Moa and Pyramid complaints and summarizing arguments for EGC
8/1/2019	Joe Guglielmo	2.50	Research 481A claims, conf with EGC.
8/1/2019	Erin Green Comite	8.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
8/1/2019	Michelle Conston	3.50	Draft and revise opposition to Monarch's and Underwriters' motion to dismiss
8/2/2019	Michelle Conston	8.50	Draft and revise opposition to Monarch's and Underwriters' motion to dismiss
8/2/2019	Erin Green Comite	10.00	Legal Research and drafting of sections of Monarch's and Underwriters' MTD opposition brief.
8/2/2019	Justin Batten	2.10	Reading Moa and Pyramid complaints and summarizing arguments for EGC; research on surplus lines insurance law

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8/2/2019	Justin Batten	1.00	Research case law on pleading standards
8/3/2019	Justin Batten	6.00	Research case law on pleading standards; reviewing and revising opposition briefs
8/3/2019	Erin Green Comite	3.00	Revision of brief in opposition to Monarch's and Underwriters' MTD.
8/3/2019	Michelle Conston	1.50	Draft and revise opposition to Monarch's and Underwriters' MTD
8/4/2019	Michelle Conston	4.60	Draft and revise opposition to Monarch's and Underwriters' MTD
8/4/2019	Joe Guglielmo	1.50	Research negligence and unjust enrichment for Opp to Monarch's and Underwriters' MTD. Conf with EGC.
8/4/2019	Erin Green Comite	4.00	Revision of brief in opposition to Monarch's and Underwriters' MTD.
8/4/2019	Justin Batten	4.30	Reviewing and revising opposition briefs; reading case law on brokers' agency status and surplus lines private actions
8/4/2019	Kaitlin Steinberger	4.60	Formatted, proofed, and cite checked opposition brief to Underwriters MTD
8/5/2019	Kaitlin Steinberger	7.30	Formatted, proofed, and cite checked opposition brief to Monarch MTD; inserted edits to Underwriters brief; drafted declaration in support of Underwriters brief; inserted edits to Monarch brief
8/5/2019	Justin Batten	1.50	Reviewing and revising opposition briefs; preparing declaration for exhibit to be filed with complaint; discussion of next step with MEC
8/5/2019	Erin Green Comite	14.00	Finalizing brief in opposition to Monarch's and Underwriters' MTD.
8/5/2019	Joe Guglielmo	1.20	Review and edit opp to Monarch's and Underwriters' MTD.
8/5/2019	Michelle Conston	5.80	Draft and revise opposition to Monarch's and Underwriters' MTD; case analysis and strategy with EGC
8/6/2019	Joe Guglielmo	1.10	Review in opp. to Monarch's and Underwriters' MTD.
8/6/2019	Erin Green Comite	14.00	Finalizing brief in opposition to Monarch's and Underwriters' MTD.
8/6/2019	Kaitlin Steinberger	3.60	Inserted further edits to Monarch and Underwriters briefs; re-pulled TOCs; pulled TOAs; inserted further edits to declaration – compiled exhibit in support; finalized and filed all docs via ECF in D. Haw.
8/6/2019	Justin Batten	4.60	Reviewing and revising opposition briefs
8/6/2019	Michelle Conston	8.10	Draft and revise opposition to Monarch and Lloyd's motions to dismiss
8/7/2019	Michelle Conston	0.50	Case analysis and strategy with EGC

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8/7/2019	Erin Green Comite	6.00	Review of Moa and Pyramid briefs and preparation for Lloyds and Monarch hearing.
8/7/2019	Kaitlin Steinberger	0.80	Prepared and shipped courtesy copies to judge; pulled all filed MTD briefs (and oppositions) and emailed to Erin C.
8/7/2019	Justin Batten	0.50	Discussion with EGC of next steps for case and preparation for oral argument
8/7/2019	Erin Green Comite	0.50	Discussion with Justin Batten regarding next steps for case and preparation for oral argument.
8/8/2019	Erin Green Comite	6.00	Preparation for Lloyds Monarch hearing; review of Moa and Pyramid briefs.
8/8/2019	Michelle Conston	0.50	Receipt and review of case documents
8/9/2019	Erin Green Comite	8.00	Drafting Moa and Pyramid mtd opp briefs.
8/11/2019	Michelle Conston	0.50	Receipt and review of protective order in state cases and advise JG on applicability to federal case
8/12/2019	Justin Batten	0.20	Preparing case summaries for oral argument
8/12/2019	Michelle Conston	1.50	Receipt and review of pyramid and moa's motions to dismiss
8/13/2019	Michelle Conston	2.50	Draft and revise opposition to pyramid and moa's motions to dismiss.
8/13/2019	Michelle Conston	1.50	Receipt and review of Lloyd's and Monarch's MTD reply briefs.
8/13/2019	Michelle Conston	1.50	Draft and revise summary of Lloyd's and Monarch's MTD reply briefs.
8/13/2019	Justin Batten	4.80	Preparing case summaries for oral argument
8/13/2019	Erin Green Comite	4.00	Drafting Moa and Pyramid mtd opp briefs.
8/14/2019	Justin Batten	4.70	Preparing case summaries for oral argument; reading defendants' reply briefs; coordinating preparation of binders of pleadings and cases for oral argument
8/14/2019	Erin Green Comite	8.00	Drafting briefs in opposition to Moa's and Pyramid's motions to dismiss.
8/14/2019	Joe Guglielmo	0.80	Review and prep for OPP to Moa's and Pyramid's MTD.
8/14/2019	Michelle Conston	2.50	Draft and revise opposition to pyramid and moa's motions to dismiss.
8/14/2019	Michelle Conston	1.50	Receipt and review of Lloyd's and Monarch's MTD reply briefs.
8/14/2019	Michelle Conston	1.50	Draft and revise summary of Lloyd's and Monarch's MTD reply briefs.
8/15/2019	Erin Green Comite	8.00	Drafting briefs in opposition to Moa's and Pyramid's motions to dismiss.
8/15/2019	Michelle Conston	2.50	Draft and revise opposition to pyramid and moa's motions to dismiss

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8/15/2019	Justin Batten	1.30	Preparing case summaries for oral argument
8/15/2019	Kaitlin Steinberger	0.50	Formatted and proofed letter to counsel re related action and settlement
8/16/2019	Justin Batten	1.70	Preparing case summaries for oral argument; reading correspondence to counsel in District of New Jersey Lloyd's action
8/16/2019	Kaitlin Steinberger	0.40	Inserted edits to related action letter – finalized and served on all counsel via email
8/16/2019	Michelle Conston	5.50	Draft and revise opposition to Pyramid and Moa's motions to dismiss
8/16/2019	Joe Guglielmo	2.30	Prep for argument, conf with EGC, JWBa and MEC re cases.
8/16/2019	Erin Green Comite	1.30	Conference with J. Guglielmo, JWBa and MEC re cases.
8/16/2019	Justin Batten	1.30	Conference with J. Guglielmo, Erin Comite and Michelle Conston re cases.
8/16/2019	Michelle Conston	1.30	Conference with JG, EGC and JWB re cases.
8/16/2019	Erin Green Comite	4.00	Revision of briefs in opposition to Moa's and Pyramid's motions to dismiss.
8/17/2019	Erin Green Comite	10.00	Revision of briefs; drafting oral argument outline.
8/17/2019	Justin Batten	2.00	Preparing case summaries for oral argument
8/18/2019	Michelle Conston	4.00	Prepare for oral argument on Lloyd's and Monarch's MTDs
8/18/2019	Justin Batten	6.70	Preparing case summaries for oral argument
8/18/2019	Joe Guglielmo	2.30	Review opp to MTD, conf with EGC, JWBa and MEC re cases.
8/18/2019	Michelle Conston	1.30	Conference with EGC, JG and JWBa re cases.
8/18/2019	Justin Batten	1.30	Conference with EGC, JG and Michelle Conston re cases.
8/18/2019	Erin Green Comite	1.30	Conference with J. Guglielmo, Michelle Conston and JWBa re cases.
8/18/2019	Erin Green Comite	0.30	Communicate (in firm) with J. Guglielmo, Michelle Conston and Justin Batten regarding case updates.
8/19/2019	Erin Green Comite	8.00	Revision of briefs.
8/19/2019	Erin Green Comite	2.00	Oral argument preparation.
8/19/2019	Michelle Conston	4.10	Draft and revise opposition to Moa and Pyramid MTDs.
8/19/2019	Michelle Conston	4.00	Prepare for oral argument on Lloyd's and Monarch's MTDs.
8/19/2019	Kaitlin Steinberger	7.50	Formatted, proofed, and cite checked opposition briefs to Moa and Pyramid MTDs; research re legislative history of HRS 480-11(b)
8/19/2019	Kaitlin Steinberger	0.30	Pulled and emailed settlement agreement in related action to defense counsel

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8/19/2019	Justin Batten	5.50	Preparing case summaries for oral argument; meeting with JPG, EGC, and MEC to discuss strategy and preparation for oral argument; preparing slides showing relationships between defendants
8/19/2019	Justin Batten	0.20	Reviewing and adding to outline for oral argument
8/19/2019	Michelle Conston	1.50	Draft and revise opposition to Moa and Pyramid MTDs; prepare for oral argument on Lloyd's and Monarch's MTDs; case analysis and strategy with JG, JB, and EGC
8/20/2019	Joe Guglielmo	1.90	Prep for MTD argument.
8/20/2019	Justin Batten	1.10	Discussion with MEC re status of Pyramid and Moa opposition briefs; reviewing Lloyd's demonstratives with MEC; preparing case summaries for oral argument
8/20/2019	Kaitlin Steinberger	0.40	Updated hearing prep binder for Joe G.
8/20/2019	Kaitlin Steinberger	3.00	Inserted further edits to Moa and Pyramid briefs; pulled TOCs and TOAs; finalized and filed via ECF; prepared courtesy copies of same and shipped via FedEx
8/20/2019	Kaitlin Steinberger	1.00	Pulled legislative history for HRS 480-11
8/20/2019	Erin Green Comite	11.00	Finalizing briefs in opposition to Moa's and Pyramid's motions to dismiss.
8/20/2019	Michelle Conston	0.40	Communicate (in firm) with JWBA regarding status of Pyramid and Moa opposition briefs.
8/21/2019	Joe Guglielmo	2.00	Prep for MTD argument.
8/21/2019	Justin Batten	1.40	Email to defendants re request to appear telephonically; reviewing and revising outlines for oral argument; reading email correspondence re injunctive relief standing issue
8/21/2019	Michelle Conston	6.50	Prepare for oral argument on Lloyd's and Monarch's MTDs; case analysis and strategy with EGC
8/22/2019	Justin Batten	4.00	Preparing case summaries for oral argument; preparing slides to show relationship among parties; reading correspondence re current status of plaintiffs' contracts
8/22/2019	Erin Green Comite	9.50	Preparation for hearing.
8/22/2019	Joe Guglielmo	1.20	Prep for MTD argument.
8/22/2019	Michelle Conston	3.50	Prepare for oral argument on Lloyd's and Monarch's MTDs.
8/22/2019	Michelle Conston	3.50	Research re: standing and mootness for an injunction.

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8/22/2019	Michelle Conston	0.50	Draft and revise email re: findings of standing and mootness.
8/23/2019	Justin Batten	5.00	Preparing case summaries for oral argument.
8/23/2019	Justin Batten	0.80	Making edits to demonstratives for court.
8/23/2019	Justin Batten	1.00	Meetings with Joe Guglielmo, Erin Comite and Michelle Conston to discuss strategy for preparing for oral argument.
8/23/2019	Justin Batten	1.00	Preparing motion re joint request to attend hearing by phone.
8/23/2019	Justin Batten	1.00	Preparing pleading bin.
8/23/2019	Joe Guglielmo	5.00	Prep for MTD hearing, review cases and outline for MTD argument.
8/23/2019	Ellen DeWan	2.00	Prepare letter to judge re attendance at hearing
8/23/2019	Erin Green Comite	9.00	Preparation for hearing.
8/23/2019	Michelle Conston	8.50	Prepare for oral argument on Lloyd's and Monarch's MTDs
8/24/2019	Joe Guglielmo	5.00	Prep for MTD hearing, review cases and outline for MTD argument.
8/24/2019	Erin Green Comite	5.00	Preparation for hearing.
8/24/2019	Erin Green Comite	5.00	Objection in Lincoln Adventures.
8/25/2019	Michelle Conston	4.50	Review case materials in preparation for MTD hearing; draft and revise chart containing Lloyd's and Monarch's misrepresentations and omissions
8/26/2019	Erin Green Comite	5.00	Drafting objection in Lincoln Adventures.
8/26/2019	Michelle Conston	14.00	Travel to Hawaii for Lloyd's and Monarch's motion to dismiss hearing; case analysis and strategy with JG re: MTD hearing; review case materials in preparation for MTD hearing; case analysis and strategy with co-counsel re: MTD hearing
8/26/2019	Joe Guglielmo	10.00	Prep for MTD hearing.
8/26/2019	Kaitlin Steinberger	0.60	Formatted and proofed MOU of settlement for related action
8/27/2019	Justin Batten	8.60	Preparing case summaries for oral argument; research what the legal standard is for a settlement release being overbroad; call with EGC to discuss same; teleconference in to oral arguments on MTD
8/27/2019	Joe Guglielmo	8.50	Prep and argue MTD.
8/27/2019	Joe Guglielmo	1.80	Conf with EGC re objection to Lincoln Adventures settlement, conf Ps from Lincoln.
8/27/2019	Michelle Conston	8.50	Prepare for MTD oral argument; travel to District of Hawaii courthouse for oral argument; attend MTD hearing; case analysis and strategy with JG and co-counsel
8/27/2019	Erin Green Comite	12.00	Hearing preparation. Objection in Lincoln Adventures.
8/28/2019	Erin Green Comite	12.00	Objection in Lincoln Adventures.

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8/28/2019	Kaitlin Steinberger	5.70	Formatted, proofed, and cite checked opposition to settlement – inserted edits to same; drafted declaration; compiled exhibits; pulled TOC and TOA; drafted NOA for Jon Z.; finalized and filed all via ECF
8/28/2019	Justin Batten	3.10	Research what the legal standard is for a settlement release being overbroad
8/28/2019	Joe Guglielmo	5.00	Review and edit objection to Lincoln Adventures settlement, conf with EGC. Conf with Ds and Ps from Lincoln.
8/28/2019	Joe Guglielmo	1.30	Conf with J. Foster and Pyramid. Prep for meeting.
8/28/2019	Joe Guglielmo	0.70	Conf with MEC re reply arguments from Moa and Pyramid.
8/28/2019	Michelle Conston	4.00	Receipt and review of Moa and Pyramid's reply briefs.
8/28/2019	Michelle Conston	2.70	Draft and revise outline of Moa and Pyramid's reply briefs.
8/28/2019	Michelle Conston	0.70	Case analysis and strategy with Joe Guglielmo.
8/28/2019	Michelle Conston	0.50	Participate in FRE 408 discussions with defendant.
8/29/2019	Michelle Conston	6.00	Receipt and review of cases cited in Moa and Pyramid's reply briefs.
8/29/2019	Kaitlin Steinberger	2.70	Submitted legislative history request to Hawaii law librarian; drafted DNJ pro hacs for Erin C. and Joe G.
8/29/2019	Erin Green Comite	0.50	Call with Syndicate 609 counsel re Lincoln Adventures objection.
8/29/2019	Erin Green Comite	1.00	Telephone call with J. Guglielmo re objection in Lincoln Adventures.
8/29/2019	Joe Guglielmo	1.00	Review cases for reply and argument.
8/30/2019	Joe Guglielmo	0.20	Conf with Lincoln Adventures re objection.
8/30/2019	Irina Chilaia	3.00	Review Joe G's instructions regarding briefs/cases/etc., confer with Michelle re same, preparation of briefs, start preparation of case TOC
8/30/2019	Erin Green Comite	1.00	Review of case status.
8/30/2019	Kaitlin Steinberger	0.20	Arranged for payment of doc request to Hawaii law library
8/30/2019	Kaitlin Steinberger	2.90	Compared cited cases from all Moa and Pyramid MTD briefs to previously pulled cases from Lloyd's and Monarch briefs – compiled list of same
8/30/2019	Justin Batten	0.40	Prepare for Moa and Pyramid MTD oral argument
8/30/2019	Michelle Conston	2.50	Receipt and review of Moa and Pyramid's reply briefs.
8/30/2019	Michelle Conston	2.00	Draft and revise outline of Moa and Pyramid's reply briefs.
8/30/2019	Michelle Conston	2.00	Prepare for Moa and Pyramid MTD hearing.
8/31/2019	Joe Guglielmo	0.60	Review docs for MTD argument.
9/1/2019	Joe Guglielmo	4.50	Prepare for oral argument; confer with MC.



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9/1/2019	Justin Batten	1.80	Research of case law for oral argument (Moa and Pyramid); reading Moa and Pyramid reply briefs
9/2/2019	Michelle Conston	2.50	prepare for oral argument on Moa and Pyramid MTDs; draft and revise case summaries for oral argument
9/2/2019	Justin Batten	6.00	Research of case law for oral argument (Moa and Pyramid); prepare summaries of cited cases
9/2/2019	Joe Guglielmo	2.50	Prepare for oral argument, review cases; confer with MC; confer with EGC.
9/2/2019	Michelle Conston	1.50	Prepare for Moa and Pyramid MTD hearing
9/2/2019	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo regarding case strategy for oral argument.
9/3/2019	Joe Guglielmo	0.20	Communicate (in firm) with EGC and MEC regarding oral argument.
9/3/2019	Michelle Conston	0.20	Participate in telephone call with Joe Guglielmo, Justin Batten, and Erin Comite re: oral argument.
9/3/2019	Michelle Conston	0.30	Receipt and review of decision in Vess.
9/3/2019	Michelle Conston	5.00	Prepare for oral argument on Moa and Pyramid MTDs; draft and revise case summaries for oral argument; draft and revise summary of Moa and Pyramid.
9/3/2019	Justin Batten	3.70	Research of case law for oral argument (Moa and Pyramid); prepare summaries of cited cases; meeting with JPG, EGC, and MEC to discuss prep for oral argument; prepare summaries of misrepresentations and omissions
9/3/2019	Erin Green Comite	4.00	Preparation for hearing.
9/3/2019	Kaitlin Steinberger	0.70	MTD (round 1) hearing transcript request; pulled newly cited cases in round 2 of MTD briefing
9/4/2019	Kaitlin Steinberger	0.60	Inserted edits into Erin C. and Joe G.'s DNJ pro hac motions; finalized and filed both
9/4/2019	Kaitlin Steinberger	0.10	Submitted proof of payment for MTD transcript request
9/4/2019	Michelle Conston	6.50	prepare for oral argument on Moa and Pyramid MTDs; draft and revise case summaries for oral argument
9/4/2019	Justin Batten	1.30	Discussion with MEC about case summaries; correspondence with defense counsel re joint request for telephonic appearance; preparing letter re same; research case law for oral argument

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9/4/2019	Joe Guglielmo	2.00	Prepare for oral MTD argument.
9/4/2019	Joe Guglielmo	0.60	Review and edit Lincoln Adventures settlement stipulation; confer with EGC.
9/4/2019	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo regarding Lincoln Adventures settlement stipulation.
9/5/2019	Michelle Conston	3.00	Prepare for oral argument on Moa and Pyramid MTDs.
9/5/2019	Michelle Conston	2.50	Receipt and review of transcript from Monarch and Lloyd's MTD oral argument.
9/5/2019	Joe Guglielmo	0.80	Edit Lincoln Adventures stipulation, meet and confer with Defendants.
9/5/2019	Joe Guglielmo	2.00	Prepare for oral MTD argument.
9/5/2019	Erin Green Comite	2.00	Preparation for hearing.
9/5/2019	Justin Batten	2.60	Preparing letter to court requesting permission to attend conference by phone; sending same to defense counsel; research case law on insurance in Hawaii; discussion re same with MEC
9/5/2019	Kaitlin Steinberger	1.30	Formatted and proofed joint request letter to attend MTD round 2 hearing telephonically – finalized and filed same; emailed word version to judge's chambers
9/5/2019	Kaitlin Steinberger	0.30	Mailed courtesy copies of pro hac motions to judge
9/6/2019	Erin Green Comite	4.00	Hearing preparation.
9/6/2019	Joe Guglielmo	0.60	Edit Lincoln Adventures stipulation, meet and confer with Defendants.
9/6/2019	Joe Guglielmo	1.80	Prepare for oral MTD argument.
9/6/2019	Michelle Conston	2.50	Prepare for oral argument on Moa and Pyramid MTDs; draft and revise case summaries for oral argument.
9/6/2019	Michelle Conston	1.50	Research re: reply briefs in support of Moa and Pyramid's MTD's.
9/6/2019	Michelle Conston	1.50	Research re: exemption statutes.
9/7/2019	Joe Guglielmo	4.00	Prepare for MTD argument, review cases and edit outline.
9/7/2019	Joe Guglielmo	0.40	Confer with EGC and K. Wood re Lincoln Adventures settlement stipulation.
9/7/2019	Justin Batten	0.50	Reading Pyramid and Moa reply briefs; reviewing Hawaii legislative history
9/7/2019	Erin Green Comite	1.00	Review of proposed agreement with Syndicate 1183.
9/8/2019	Joe Guglielmo	3.60	Prepare for MTD argument, review cases, briefs, and edit outline.
9/9/2019	Erin Green Comite	2.00	Hearing preparation.
9/9/2019	Justin Batten	0.30	Reviewing Facebook posts by Moa Insurance
9/9/2019	Joe Guglielmo	10.00	Prepare for MTD argument, review cases, confer with EGC.

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9/9/2019	Joe Guglielmo	1.50	Review and edit Lincoln Adventures stipulation; confer with Defendants; confer with Plaintiffs in Lincoln Adventures and EGC.
9/9/2019	Michelle Conston	1.50	research re: 480-11b
9/9/2019	Michelle Conston	3.00	attend motion to dismiss hearing by telephone; research re: negligence
9/10/2019	Joe Guglielmo	9.50	Prepare to argue MTD.
9/10/2019	Joe Guglielmo	1.00	Edit Lincoln Adventures settlement stipulation.
9/10/2019	Justin Batten	2.00	Listen to oral argument of Moa and Pyramid MTD
9/10/2019	Erin Green Comite	1.00	Prepare for hearing.
9/10/2019	Erin Green Comite	3.00	Review of proposed agreement with Syndicate 1183.
9/10/2019	Erin Green Comite	0.50	Call with Abigail Nitka re syndicates settlement.
9/11/2019	Kaitlin Steinberger	0.20	MTD (round 2) hearing transcript request
9/11/2019	Kaitlin Steinberger	0.40	Pulled and forwarded DNJ filings to Joe G. and Erin C.
9/11/2019	Justin Batten	0.40	Investigation of Moa and Pyramid websites
9/11/2019	Joe Guglielmo	5.50	Prepare for client meetings in Hilo, Hawaii; confer with K. Wood and J. Foster; travel to NY.
9/12/2019	Joe Guglielmo	1.40	Edit Lincoln Adventures settlement stipulation.
9/12/2019	Justin Batten	1.50	Reviewing client documents; investigation of Moa & Pyramid statements
9/12/2019	Michelle Conston	2.50	receipt and review of documents; create a table of documents
9/13/2019	Justin Batten	1.10	Reading response to opposition to final approval of settlement; discussion with MEC about investigation for case; preparing questions for clients
9/13/2019	Erin Green Comite	2.00	Addressing syndicates settlement objection.
9/13/2019	Joe Guglielmo	2.00	Confer with Lloyds Lincoln Adventures, Defendants, and Plaintiffs re stipulation and settlement of objection; review and edit draft; confer with EGC.
9/14/2019	Justin Batten	0.70	Drafting client questionnaire
9/15/2019	Joe Guglielmo	1.00	Edit Lincoln Adventures settlement stipulation; confer with Defendants.
9/16/2019	Justin Batten	0.40	Discussion with MEC re case status

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9/16/2019	Michelle Conston	0.40	Discussion with JWBa re case status.
9/16/2019	Joe Guglielmo	2.30	Prepare for hearing, confer with Lloyds Lincoln Adventures, Defendants and Plaintiffs re stipulation and settlement of objection; review and edit draft; confer with EGC.
9/16/2019	Erin Green Comite	2.00	Dealing with syndicates settlement objection.
9/16/2019	Michelle Conston	1.00	draft and revise letter to the second circuit enclosing class certification decision
9/17/2019	Erin Green Comite	2.00	Dealing with syndicates settlement objection.
9/17/2019	Michelle Conston	0.10	research docket in preparation for objection oral argument
9/17/2019	Kaitlin Steinberger	0.20	Ran redline comparison of two versions of settlement agreement
9/17/2019	Joe Guglielmo	3.30	Prepare for and attend final approval hearing for Lloyds Lincoln Adventures settlement, confer with Defendants' and Plaintiffs' counsel re stipulation.
9/17/2019	Joe Guglielmo	1.50	Meet and confer with Defendants, and edits to settlement stipulation for Lincoln Adventures settlement; confer with Defendants' and Plaintiffs' counsel re stipulation.
9/18/2019	Justin Batten	0.20	Reading correspondence re stipulation to objection to settlement
9/18/2019	Joe Guglielmo	3.30	Prepare for and attend final approval hearing for Lloyds Lincoln Adventures settlement; confer with Defendants' and Plaintiffs' counsel re stipulation.
9/18/2019	Erin Green Comite	2.00	Dealing with syndicates settlement objection.
9/22/2019	Justin Batten	0.50	Reading client interrogatory answers
9/24/2019	Michelle Conston	0.80	receipt and review of plaintiff documents
9/24/2019	Justin Batten	0.20	Discussion with MEC regarding case status
9/24/2019	Michelle Conston	0.20	Discussion with JWBa regarding case status.
9/25/2019	Joe Guglielmo	1.00	Confer with MC re questions for client, review the notes of the conversation for the questionnaire.
9/26/2019	Michelle Conston	1.50	participate in telephone call with the Aquilina plaintiffs; draft and revise notes of telephone call
9/26/2019	Joe Guglielmo	1.00	Confer with Aquilina's re facts for complaint; review notes and questions for prep.
9/26/2019	Justin Batten	2.10	Review of client answers to questions; craft additional questions for clients; call with clients
9/27/2019	Joe Guglielmo	2.60	Review opinions re motions to dismiss, confer with EGC.
9/27/2019	Justin Batten	0.80	Cleaning up and organizing notes from call with clients
9/27/2019	Justin Batten	0.20	Loading client documents to SharePoint
9/27/2019	Erin Green Comite	4.00	Review of motion to dismiss opinions and confer with J. Guglielmo.

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9/28/2019	Justin Batten	1.70	Reading opinions on MTD
9/29/2019	Justin Batten	3.70	Reading opinions on MTD
9/30/2019	Joe Guglielmo	1.50	rev client docs for amended complaint
9/30/2019	Erin Green Comite	4.00	Legal Research re claims.
10/1/2019	Erin Green Comite	6.00	Legal Research re claims.
10/2/2019	Michelle Conston	1.00	Participate in telephone call with client.
10/2/2019	Michelle Conston	1.50	Draft and revise notes of telephone call with client.
10/2/2019	Michelle Conston	0.50	Prepare for telephone call with client.
10/2/2019	Michelle Conston	1.00	Research re: stipulating to an extension of time.
10/2/2019	Michelle Conston	1.50	Research re: legal issues arising from the Court's MTD order.
10/2/2019	Erin Green Comite	3.00	Legal Research re amended complaint.
10/2/2019	Justin Batten	3.20	Call with clients to discuss facts of case; correspondence concerning same; investigate surplus lines brokers' regulatory filings; review of client documents
10/2/2019	Joe Guglielmo	1.00	client call re facts for amended complaint
10/3/2019	Justin Batten	2.20	Prepare records request to Hawaii Insurance Division; review of Lane state court complaint; discussion of case status with MEC
10/3/2019	Michelle Conston	2.50	receipt and review of potential client's documents; email with co-counsel re: potential new clients
10/3/2019	Kaitlin Steinberger	0.20	Pulled and emailed DNJ settlement orders to Joe G. and Erin C.
10/3/2019	Erin Green Comite	1.00	Legal Research re amended complaint.
10/4/2019	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo and Alex Vargas regarding next steps.
10/4/2019	Michelle Conston	2.00	Research re: legal issues arising from the Court's MTD order.
10/4/2019	Michelle Conston	2.20	Receipt and review of client documents.
10/4/2019	Justin Batten	0.60	Cleaning up and organizing notes from client call
10/4/2019	Justin Batten	0.50	Research of HPIA reporting statutes
10/4/2019	Joe Guglielmo	0.80	draft question for fact investigation, conf w A Vargas
10/7/2019	Alex Vargas	3.10	review lead research and locate findings. Comm with AxW re same, next steps. Review interview questions drafted by JH/EC. Draft investigation outline

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10/7/2019	Joe Guglielmo	0.40	conf w Ds re scheduling for amended complaint and MTD
10/7/2019	Joe Guglielmo	1.80	conf w EGC and MC re research for amended complaint, conf w clients re additional docs. Conf w Lanes re case and related docs
10/7/2019	Michelle Conston	3.20	research re: legal issues arising from the Court's MTD order; receipt and review of client documents
10/7/2019	Justin Batten	2.40	Research on agent and broker duties.
10/7/2019	Justin Batten	2.00	Research on HPIA reporting.
10/7/2019	Justin Batten	1.00	Call with clients.
10/7/2019	Erin Green Comite	0.30	Communicate (in firm) with J. Guglielmo and Michelle Conston regarding research for amended complaint.
10/8/2019	Michelle Conston	1.00	Participate in telephone call with client.
10/8/2019	Michelle Conston	1.00	Draft and revise notes of telephone call with client.
10/8/2019	Michelle Conston	0.50	Prepare for telephone call with client.
10/8/2019	Michelle Conston	0.50	Email team re: potential clients.
10/8/2019	Erin Green Comite	2.00	Legal Research re amended complaint.
10/8/2019	Justin Batten	4.10	Research on agent and broker duties; typing up and organizing notes from client call
10/8/2019	Alex Vargas	0.80	comm with AxW re lead research, locates, lead list. Review materials
10/9/2019	Alex Vargas	0.90	multiple comm with VxF/ExD re lead list. Review same. Comm with JG re status
10/9/2019	Erin Green Comite	2.00	Legal Research re amended complaint.
10/9/2019	Joe Guglielmo	0.30	research client claims for amended complaint, conf w JB and MC
10/9/2019	Justin Batten	3.90	Research claim preclusion case law.
10/9/2019	Justin Batten	1.00	Prepare stipulation re time to amend complaint.
10/9/2019	Michelle Conston	0.20	Communicate (in firm) with JG regarding amended complaint.
10/10/2019	Joe Guglielmo	0.80	research for client info for amended complaint
10/10/2019	Erin Green Comite	2.00	Legal Research re amended complaint.
10/10/2019	Alex Vargas	2.70	multiple comm with VF/AW re lead research, lead list entries, next steps. Review same. Review materials
10/11/2019	Justin Batten	0.40	Reviewing joint stipulation re extension of time to file
10/11/2019	Alex Vargas	2.30	comm with VF/AW re lead list entries, etc. Review materials
10/11/2019	Erin Green Comite	1.00	Call with insurance expert.
10/11/2019	Erin Green Comite	4.00	Legal Research re amended complaint.
10/11/2019	Ellen DeWan	1.50	Final and file stipulation, courtesy copy to court fees.
10/11/2019	Joe Guglielmo	1.50	conf w pot expert re claims and factual research

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10/12/2019	Justin Batten	2.30	Research Hawaii case law on claim preclusion
10/13/2019	Justin Batten	0.30	Research Hawaii case law on claim preclusion
10/14/2019	Alex Vargas	0.60	review lead list, place calls
10/15/2019	Alex Vargas	2.30	review lead list, place calls, conduct interview
10/16/2019	Michelle Conston	3.00	research re: legal issues arising from the Court's MTD order
10/16/2019	Alex Vargas	3.20	review lead list, place calls. Review interview notes and begin drafting interview report
10/17/2019	Alex Vargas	4.10	continue and complete drafting interview report. Email comm with JG re same, next steps. Review lead list, place calls
10/17/2019	Michelle Conston	8.20	research re: legal issues arising from the Court's MTD order
10/18/2019	Alex Vargas	0.80	further comm with JG re next steps. Comm with DCW
10/18/2019	Michelle Conston	0.20	Email with Erin Comite re: continuation of the status conference.
10/18/2019	Michelle Conston	5.00	Research re: legal issues arising from Court's MTD order.
10/18/2019	Erin Green Comite	0.20	Communicate (in firm) with Michelle Conston regarding continuation of the status conference.
10/20/2019	Michelle Conston	0.20	receipt and review of client documents and email team
10/21/2019	Michelle Conston	1.00	Participate in telephone call with client.
10/21/2019	Michelle Conston	3.00	Receipt and review of client's gmail account.
10/21/2019	Michelle Conston	1.00	Research re: legal issues arising from the Court's MTD order.
10/21/2019	Justin Batten	0.30	Reading correspondence re client documents
10/21/2019	Alex Vargas	0.50	review lead list, place calls
10/22/2019	Justin Batten	1.30	Review of response to open records request; call with Hawaii Insurance Division
10/22/2019	Michelle Conston	5.00	Receipt and review of client documents.
10/22/2019	Michelle Conston	0.50	Prepare binders for Joe Guglielmo re: client documents.
10/22/2019	Michelle Conston	4.00	Research re: legal issues arising from the Court's MTD order.
10/23/2019	Michelle Conston	7.40	research re: legal issues arising from the Court's MTD order
10/23/2019	Justin Batten	1.50	Research on duties in the insurance industry
10/23/2019	Joe Guglielmo	1.60	rev info for addl client allegations
10/24/2019	Michelle Conston	6.00	research re: legal issues arising from the Court's MTD order
10/25/2019	Justin Batten	0.20	Legal research on insurer and broker duties
10/25/2019	Michelle Conston	7.50	research re: legal issues arising from the Court's MTD order
10/27/2019	Justin Batten	4.20	Research on duties in the insurance industry
10/28/2019	Michelle Conston	4.10	research re: legal issues arising from the Court's MTD order

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10/28/2019	Justin Batten	4.90	Research on duties in the insurance industry
10/29/2019	Justin Batten	0.60	Review of client notes re procurement of insurance
10/29/2019	Michelle Conston	2.00	research re: legal issues arising from the Court's MTD order
10/30/2019	Michelle Conston	4.50	Research re: legal issues arising from the Court's MTD order.
10/30/2019	Michelle Conston	4.00	Receipt and review of plaintiffs' documents.
10/30/2019	Michelle Conston	0.50	Case analysis and strategy with Joe Guglielmo.
10/30/2019	Michelle Conston	0.10	Call magistrate judge's chambers re: adjournment of hearing.
10/30/2019	Justin Batten	1.50	Meeting with JPG to discuss HPIA records requests; correspondence with MEC re amended complaint; reviewing client documents
10/31/2019	Michelle Conston	3.50	Research re: legal issues arising from the Court's MTD order.
10/31/2019	Michelle Conston	4.00	Receipt and review of plaintiff's documents.
11/1/2019	Michelle Conston	1.00	receipt and review of potential plaintiff documents
11/1/2019	Justin Batten	0.20	Discussion with MEC about case status
11/1/2019	Joe Guglielmo	0.50	conf w MC re new claims for client
11/1/2019	Michelle Conston	0.50	Communicate (in firm) with Joseph Guglielmo re new claims for client.
11/4/2019	Justin Batten	1.20	Review of Monarch and Pyramid financials
11/4/2019	Michelle Conston	1.00	Email with team re: Hawaii records request results; receipt and review of potential plaintiff documents; draft and revise email to potential plaintiff re: follow up telephone call
11/5/2019	Justin Batten	2.80	Meeting with JPG and MEC to discuss records requests; preparing records requests
11/5/2019	Michelle Conston	1.00	Communicate (in firm) with JG and Justin Batten regarding records requests.
11/5/2019	Joe Guglielmo	1.00	Communicate (in firm) with Michelle Conston and Justin Batten regarding records requests.
11/6/2019	Joe Guglielmo	0.50	rev contracts with Monarch, conf w JB.
11/6/2019	Michelle Conston	0.20	email team re: language in the Monarch producers' agreement
11/6/2019	Justin Batten	0.50	Discussion with MEC re research questions; research on Hawaii lava zones
11/7/2019	Joe Guglielmo	1.00	Communicate (in firm) with JWBa regarding Lloyd's coverholder agreement.
11/7/2019	Michelle Conston	4.50	research re: JG's post MTD questions; draft and revise memorandum re: research
11/7/2019	Justin Batten	2.10	Research into Hawaii surplus lines insurance and lava zones; meeting with JPG to discuss Lloyd's coverholder agreement
11/7/2019	Kaitlin Steinberger	0.30	Submitted legislative history request to HI law library



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11/8/2019	Michelle Conston	5.50	research re: JG's post MTD questions; draft and revise memorandum re: research; case analysis and strategy with JG
11/8/2019	Erin Green Comite	8.00	Legal Research for amended complaint.
11/8/2019	Joe Guglielmo	0.40	Communicate (in firm) with Michelle Conston regarding case analysis and strategy.
11/11/2019	Justin Batten	1.10	Meeting with JPG and MEC to plan for call to client; research of Lloyd's insurance
11/11/2019	Kaitlin Steinberger	0.10	Follow-up re 11/07 legislative history request
11/11/2019	Michelle Conston	4.50	research re: JG's post MTD questions; draft and revise memorandum and circulate to team
11/11/2019	Joe Guglielmo	0.60	conf w MC and JB re client documents.
11/12/2019	Joe Guglielmo	0.80	rev docs for possible client, conf w MC
11/12/2019	Michelle Conston	3.50	Receipt and review of documents from potential plaintiffs.
11/12/2019	Michelle Conston	0.70	Email team re: strengths and weaknesses of potential plaintiffs.
11/13/2019	Joe Guglielmo	1.00	rev docs for possible client, conf w MC
11/13/2019	Michelle Conston	0.80	participate in telephone call with potential class member; prepare for telephone call with potential class member
11/13/2019	Justin Batten	0.70	Call with client to discuss her purchase of insurance; meeting with MEC to discuss same
11/14/2019	Justin Batten	0.30	Reading correspondence from defendants re communications with employees
11/14/2019	Kaitlin Steinberger	0.20	Emails to/from HI law librarian re document request and submission of proof of payment for same
11/14/2019	Joe Guglielmo	0.60	rev docs for complaint, conf w MC
11/14/2019	Michelle Conston	0.20	Communicate (in firm) with JG regarding complaint.
11/15/2019	Joe Guglielmo	0.30	Communicate (in firm) with JAV regarding letter from opposing counsel.
11/15/2019	Justin Batten	0.90	Review of legislative history of HPIA
11/15/2019	Alex Vargas	1.40	comm with JG re letter from opposing counsel. Review opposing counsel letter. Review materials. Further comm
11/18/2019	Justin Batten	0.30	Discussing HPIA legislative history with Michelle Conston.
11/18/2019	Justin Batten	2.00	Prepare letter in response to Pyramid letter re investigative inquiries.
11/19/2019	Michelle Conston	2.50	receipt and review of potential plaintiff documents
11/19/2019	Alex Vargas	2.40	review materials. Meet with JB to discuss investigation practices, response letter, etc. Further comm with JB/SSM re research findings, next steps. Draft revisions to proposed response letter

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11/19/2019	Justin Batten	1.50	Discussing response to Lissa Andrews letter with Alex Vargas and Sinai Megibow; preparing letter
11/19/2019	Kaitlin Steinberger	0.40	Transferred draft letter to Joe G. letterhead – formatted and proofed
11/20/2019	Michelle Conston	3.50	receipt and review of potential plaintiff documents; email team re: findings of research
11/20/2019	Justin Batten	0.90	Correspondence re production of government records; preparing letter response re contact of former employees
11/21/2019	Michelle Conston	1.50	receipt and review of potential plaintiff documents
11/22/2019	Kaitlin Steinberger	0.80	Formatted, proofed, and cite checked revised letter re ex-employees – finalized and emailed PDF to Justin B. for service on all counsel
11/22/2019	Erin Green Comite	2.00	Revision of letter re investigation.
11/22/2019	Michelle Conston	1.00	participate in telephone call with co-counsel re: state cases
11/22/2019	Justin Batten	1.20	Finalizing letter to Pyramid re contact of former employees
11/27/2019	Joe Guglielmo	0.40	rev client info for amendment of complaint
11/30/2019	Joe Guglielmo	0.40	Communicate (in firm) with MEC and JWBa regarding case analysis and strategy; discuss HPIA records request.
12/1/2019	Michelle Conston	0.10	Email with Shannon Bishop re: scheduling call with potential plaintiff
12/1/2019	Michelle Conston	0.40	email with J. Guglielmo re: potential plaintiffs; email Shannon Bishop to schedule call with potential plaintiffs
12/1/2019	Joe Guglielmo	0.20	Communicate (in firm) with MEC regarding potential plaintiffs.
12/2/2019	Erin Green Comite	4.00	Revision of complaint.
12/2/2019	Joe Guglielmo	1.40	rev docs for new client for case, conf w M Conston
12/2/2019	Michelle Conston	0.50	Case analysis and strategy with Joe Guglielmo
12/3/2019	Justin Batten	0.30	Reviewing results of Hawaii open records request
12/4/2019	Erin Green Comite	4.00	Revision of complaint.
12/4/2019	Michelle Conston	0.80	Research re: injunctive relief
12/4/2019	Joe Guglielmo	0.70	rev new client docs for complaint
12/5/2019	Michelle Conston	1.00	Participate in telephone call with potential plaintiff.
12/5/2019	Michelle Conston	0.50	Prepare for telephone call with potential plaintiff.
12/5/2019	Michelle Conston	2.00	Draft and revise notes of telephone call with potential plaintiff.
12/5/2019	Michelle Conston	1.00	Research in preparation for filing amended complaint.
12/6/2019	Kaitlin Steinberger	0.50	Pulled Moa Insurance website screen shots from Wayback Machine – emailed to Joe G.

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12/6/2019	Justin Batten	0.80	Discussion with Michelle Conston re amended complaint drafting; correspondence with Joseph Guglielmo re same; review of complaint
12/6/2019	Erin Green Comite	8.00	Revision of complaint.
12/6/2019	Joe Guglielmo	3.00	research and edit complaint. Conf w E Comite, J Batten and M Conston
12/6/2019	Michelle Conston	4.50	Receipt and review of plaintiffs' documents; draft and revise the amended complaint
12/8/2019	Joe Guglielmo	2.60	edit complaint, conf w E Comite
12/8/2019	Erin Green Comite	12.00	Revision of complaint
12/8/2019	Justin Batten	4.30	Drafting allegations of Amended Complaint
12/9/2019	Joe Guglielmo	2.50	edit complaint
12/9/2019	Erin Green Comite	12.00	Revision of complaint.
12/9/2019	Michelle Conston	5.00	Draft and revise amended complaint
12/9/2019	Justin Batten	1.60	Investigation of Lloyd's syndicates for purposes of drafting amended complaint
12/10/2019	Justin Batten	0.30	Drafting allegations of Amended Complaint
12/10/2019	Michelle Conston	6.50	Draft and revise amended complaint
12/10/2019	Erin Green Comite	12.00	Revision of complaint.
12/10/2019	Joe Guglielmo	3.00	Edit complaint
12/11/2019	Joe Guglielmo	3.50	finalize complaint for filing, conf w E Comite and M Conston. Edit complaint
12/11/2019	Erin Green Comite	12.00	Revision of complaint.
12/11/2019	Michelle Conston	6.50	Draft and revise amended complaint
12/11/2019	Justin Batten	0.20	Discussion with Michelle Conston re amended complaint drafting
12/11/2019	Kaitlin Steinberger	7.40	Formatted, proofed, and quote checked complaint – inserted edits
12/12/2019	Justin Batten	5.70	Research for Amended Complaint allegations; final review of Amended Complaint
12/12/2019	Michelle Conston	6.50	Draft and revise amended complaint
12/12/2019	Erin Green Comite	8.00	Revision of complaint.
12/12/2019	Kaitlin Steinberger	5.60	Fixed website cites – additional format edits – inserted additional redline/handwritten edits from Erin C., Joe G., Michelle C., and Justin B. – drafted summons for newly added defendant – finalized and filed
12/12/2019	Kaitlin Steinberger	1.00	Research re whether or not a motion to amend caption needs to be filed – emailed sample stipulations to Erin C. – TC with D. Haw. clerk re motion to amend caption
12/12/2019	Joe Guglielmo	4.60	finalize complaint for filing, conf w E Comite and M Conston. Edit complaint
12/16/2019	Kaitlin Steinberger	0.30	Arranged for service of summons and complaint on newly named defendant
12/18/2019	Joe Guglielmo	0.50	conf w Aloha counsel re scheduling to MTD.
12/18/2019	Michelle Conston	0.30	Draft and revise letters to clients enclosing complaint

## Exhibit A to Declaration of Joseph P. Guglielmo

12/18/2019	Kaitlin Steinberger	0.30	Formatted and proofed letter to clients enclosing amended complaint
12/19/2019	Joe Guglielmo	0.50	conf w K Wood re hearing dates and claims.
12/20/2019	Kaitlin Steinberger	0.20	Filed POS for Aloha Insurance Services
12/20/2019	Michelle Conston	0.30	Email with Joe Guglielmo and Erin Comite re: case scheduling
12/20/2019	Erin Green Comite	0.20	Exchange emails with Joe Guglielmo and Michelle Conston re: case scheduling
12/20/2019	Joe Guglielmo	0.20	Exchange emails with EGC and Michelle Conston re: case scheduling.
12/22/2019	Joe Guglielmo	0.40	conf w K Wood re response to settlement demands.
12/27/2019	Erin Green Comite	0.50	Attention to potential settlement issues.
12/28/2019	Justin Batten	0.30	Reviewing letters re settlement offer
12/30/2019	Justin Batten	1.20	Reading motion to dismiss briefing in related case
12/30/2019	Michelle Conston	0.50	Draft and revise Rule 16 statement
1/2/2020	Joe Guglielmo	0.40	conf w MC and Ds re scheduling of MTD.
1/2/2020	Michelle Conston	0.40	Conference with JG and Ds re scheduling of MTD.
1/2/2020	Joe Guglielmo	1.00	conf w K Wood re possible mediation for claims. Conf w EGC re settlement demand letters.
1/2/2020	Erin Green Comite	0.30	Conference with J. Guglielmo re settlement demand letters.
1/5/2020	Justin Batten	0.20	Reviewing defendants' draft stipulation re extension of time to respond
1/6/2020	Michelle Conston	0.30	Draft/revise Stipulation with defendants re: filing of motions to dismiss
1/7/2020	Michelle Conston	1.50	Draft/revise Rule 16 conference statement
1/10/2020	Justin Batten	0.20	Review of Lloyds draft scheduling conference statement
1/10/2020	Erin Green Comite	1.00	Draft/revise amended status conference report.
1/10/2020	Michelle Conston	0.50	Draft/revise Rule 16 conference statement
1/15/2020	Erin Green Comite	1.00	Draft/revise status report.
1/15/2020	Kaitlin Steinberger	1.10	Formatted and proofed Rule 16 scheduling conference statement
1/22/2020	Erin Green Comite	0.50	Communicate (other external) defense counsel regarding initial disclosures.
1/22/2020	Michelle Conston	0.50	Communicate (other external) with opposing counsel re: Rule 16 conference
1/23/2020	Erin Green Comite	0.30	Communicate (other external) with Ds and J. Guglielmo regarding Rule 16 scheduling conference.

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1/23/2020	Erin Green Comite	0.30	Communicate (other external) with Ds and J. Guglielmo regarding Rule 16 scheduling conference.
1/23/2020	Joe Guglielmo	0.30	Communicate (other external) w Ds and EGC re Rule 16 scheduling conf.
1/31/2020	Justin Batten	0.30	Communicate (other external) Call with magistrate's courtroom manager to request dial-in for scheduling conference; call with Erin Comite re same
1/31/2020	Erin Green Comite	0.10	Communicate (in firm) with JB regarding scheduling conference.
2/5/2020	Joe Guglielmo	0.20	Communicate (in firm) with JB to debrief and discuss strategy.
2/5/2020	Justin Batten	0.50	Draft/revise; Call with counsel for Moa and Aloha to meet and confer re motion to dismiss; call with Joseph Guglielmo to debrief; correspondence re same
2/6/2020	Justin Batten	0.90	Research re Colorado River Abstention Doctrine
2/6/2020	Justin Batten	0.80	L240; A105; Conference with Michelle Conston re Colorado River Abstention Doctrine; prepare for same
2/6/2020	Michelle Conston	0.20	Communicate (in firm) with JB regarding Colorado River Abstention Doctrine.
2/7/2020	Justin Batten	3.60	Research re Colorado River Abstention Doctrine
2/8/2020	Justin Batten	1.60	Research re Colorado River Abstention Doctrine
2/9/2020	Justin Batten	4.50	Research re Colorado River Abstention Doctrine
2/10/2020	Justin Batten	0.40	Communicate (co-counsel) Conference call with Joe Guglielmo, Michelle Conston, Kirk Wood, and Jeff Foster to discuss Colorado River motion
2/10/2020	Justin Batten	3.80	Research - Preparing summaries of cases that can be used to oppose Moa and Aloha's motion to stay under Colorado River
2/10/2020	Joe Guglielmo	1.00	Communicate (co-counsel) re Ds pre motion conference, Colorado river doctrine
2/10/2020	Michelle Conston	0.50	Communicate (co-counsel) with co-counsel re: Pyramid and Moa MTD
2/11/2020	Joe Guglielmo	0.40	Communicate (in firm) w J Batten re Colorado River doctrine
2/11/2020	Justin Batten	1.50	Research - Preparing summaries of cases that can be used to oppose Moa and Aloha's motion to stay under Colorado River; correspondence with co-lead counsel team re same
2/11/2020	Justin Batten	0.40	Communicate (co-counsel) Call with Al Gayoso to discuss state court complaints (for comparison to federal court pleadings)
2/12/2020	Justin Batten	6.70	Draft/revise - Prepare memo re overlap between state and federal cases
2/12/2020	Joe Guglielmo	0.60	Communicate (in firm) w J Batten re Colorado River Doctrine
2/13/2020	Justin Batten	1.00	Review/analyze Moa motion to stay/dismiss under Colorado River
2/14/2020	Joe Guglielmo	0.50	Communicate (co-counsel) re MTD, rev memo re Colorado River Doctrine

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2/14/2020	Erin Green Comite	2.00	Review/analyze motion to dismiss and email to Joe Guglielmo regarding same.
2/14/2020	Justin Batten	0.90	Communicate (co-counsel) Meet with Al Gayoso to discuss litigation strategy
2/14/2020	Michelle Conston	2.50	Review/analyze Moa and Pyramid's motions to dismiss
2/14/2020	Justin Batten	0.30	Communicate (in firm) Conference with Michelle Conston re Aloha's and Moa's motions to dismiss
2/14/2020	Michelle Conston	0.30	Communicate (in firm) Conference with JWBa re Aloha's and Moa's motions to dismiss.
2/16/2020	Joe Guglielmo	0.50	Communicate (co-counsel) re MTD, rev memo re Colorado River Doctrine
2/17/2020	Erin Green Comite	1.50	Review/analyze motion to dismiss arguments and email to Joseph Guglielmo regarding same.
2/17/2020	Justin Batten	0.30	Communicate (in firm) Conference with Michelle Conston re planning for opposition to Moa and Aloha motions to dismiss
2/17/2020	Justin Batten	0.40	Review/analyze - Reviewing state court filings in Frederickson for comparison to issues under consideration in Aloha and Moa motions to dismiss
2/17/2020	Justin Batten	0.80	Communicate (co-counsel) Review of state court complaints to confirm when allegations of pre-contractual misconduct first appeared
2/17/2020	Joe Guglielmo	0.40	Communicate (co-counsel) re claims for state and federal cases
2/17/2020	Michelle Conston	0.30	Communicate (in firm) with JB regarding planning for opposition to Moa and Aloha MTD.
2/18/2020	Justin Batten	0.30	Research unjust enrichment for opposition to Moa and Aloha motions to dismiss.
2/18/2020	Erin Green Comite	1.00	Review/analyze Lloyd's motion to dismiss issue; telephone call with Joseph Guglielmo regarding same.
2/18/2020	Erin Green Comite	0.50	Review/analyze Lloyd's motion to dismiss issue.
2/18/2020	Erin Green Comite	0.50	Communicate (in firm) with J. Guglielmo regarding Lloyd's motion to dismiss issue.
2/18/2020	Joe Guglielmo	0.30	Communicate (in firm) with EGC regarding MTD issue.
2/18/2020	Justin Batten	0.40	Review/analyze - Review of state court complaints to confirm when allegations of pre-contractual misconduct first appeared
2/19/2020	Erin Green Comite	3.00	Communicate (other external) with Underwriters counsel regarding forthcoming motion to dismiss.
2/19/2020	Justin Batten	3.10	Research unjust enrichment for opposition to Moa and Aloha motions to dismiss.
2/20/2020	Justin Batten	2.80	Research - Research for opposition to Moa and Aloha motions to dismiss; prepare draft outline of opposition brief

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2/20/2020	Michelle Conston	2.00	Research updates in UDAP, Good faith and fair dealing, and unjust enrichment in hawaii
2/21/2020	Justin Batten	7.70	Research unjust enrichment for opposition to Moa and Aloha motions to dismiss; prepare draft outline of opposition brief.
2/22/2020	Justin Batten	4.00	Research unjust enrichment for opposition to Moa and Aloha motions to dismiss; prepare draft outline of opposition brief.
2/23/2020	Justin Batten	4.50	Research unjust enrichment for opposition to Moa and Aloha motions to dismiss; prepare draft outline of opposition brief.
2/24/2020	Justin Batten	0.20	Review/analyze - Reading draft scheduling conference statement
2/24/2020	Justin Batten	1.50	Plan and prepare for Finalizing outline of Moa and Aloha opposition briefs; confer with Michelle Conston re same
2/24/2020	Justin Batten	0.60	Communicate (in firm) Call with Michelle Conston, Erin Comite, and Joe Guglielmo to discuss planning of opposition brief to Aloha and Moa MTDs; confer with Michelle Conston re same afterward
2/24/2020	Joe Guglielmo	0.60	Communicate (co-counsel) - conf w K Wood re related cases, MTD argument. Conf w EGC re scheduling, MTD
2/24/2020	Erin Green Comite	0.30	Communicate (other external) Monarch counsel regarding motion to dismiss.
2/24/2020	Erin Green Comite	0.50	Communicate (in firm) Michelle Conston, Joe Guglielmo regarding Moa and Aloha motion to dismiss.
2/24/2020	Michelle Conston	0.50	Communicate (in firm) - telephone call with Joe G., Justin B., and Erin C.
2/24/2020	Michelle Conston	0.50	Draft/revise conference statement
2/24/2020	Michelle Conston	1.20	Draft/revise outline of Moa and Aloha's motions
2/25/2020	Joe Guglielmo	0.60	Review/analyze research for MTD, conf w J Batten
2/25/2020	Justin Batten	4.00	Draft/revise - Draft brief in opposition to Moa and Aloha motions to dismiss
2/25/2020	Erin Green Comite	0.50	Review/analyze Justin Batten's outline for motion to dismiss opposition brief.
2/26/2020	Joe Guglielmo	1.00	Communicate (in firm) w EGC and JB re MTD and outline. Conf w MC re Rule 16 report
2/26/2020	Michelle Conston	0.20	Communicate (in firm) with JG regarding Rule 16 report.
2/26/2020	Erin Green Comite	0.80	Communicate (in firm) with J. Guglielmo and JB regarding MTD and outline.

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2/27/2020	Kaitlin Steinberger	0.70	Draft/revise Rule 16 conference statement; finalized and filed
2/27/2020	Justin Batten	2.90	Draft/revise - Drafting opposition to Moa motion to dismiss
2/28/2020	Michelle Conston	3.50	Review/analyze Lloyd's and Monarch's MTDs
2/28/2020	Michelle Conston	1.50	Draft/revise Outline Lloyd's and Monarch's MTDs
3/2/2020	Michelle Conston	2.00	Research Monarch and Underwriters MTD briefs
3/2/2020	Justin Batten	2.70	Review/analyze - Draft opposition to Moa and Aloha motions to dismiss
3/3/2020	Joe Guglielmo	1.00	Communicate (in firm) w MC re MTD and outline
3/3/2020	Joe Guglielmo	0.30	Communicate (co-counsel) w K Wood re related claims , conf w EGC re scheduling
3/3/2020	Michelle Conston	0.50	Communicate (in firm) with JG re: motions to dismiss
3/3/2020	Erin Green Comite	0.10	Communicate (in firm) with J. Guglielmo regarding scheduling.
3/9/2020	Erin Green Comite	0.50	Review/analyze motion to dismiss opposition briefing status.
3/11/2020	Joe Guglielmo	1.30	Review/analyze MTD and conf w M Conston. Conf w Ds re Rule 16 status conference.
3/11/2020	Michelle Conston	0.20	Communicate (in firm) with JG regarding MTD.
3/12/2020	Michelle Conston	8.00	Draft/revise opposition to motion to dismiss
3/13/2020	Erin Green Comite	0.30	Communicate (in firm) internal team call to discuss Lloyd's status.
3/13/2020	Michelle Conston	5.00	Draft/revise opposition to motion to dismiss
3/17/2020	Michelle Conston	4.50	Draft/revise Opposition to Underwriters and Monarch's motions to dismiss
3/17/2020	Justin Batten	0.30	Review/analyze - Review order re COVID-19 and circulate to team
3/18/2020	Michelle Conston	5.50	Draft/revise Opposition to Monarch's motion to dismiss
3/18/2020	Justin Batten	0.20	Review/analyze - Read Aloha's initial disclosures, corporate disclosure statement, and certification re meet and confer obligation
3/19/2020	Michelle Conston	4.90	Draft/revise Opposition to Monarch's motion to dismiss
3/20/2020	Michelle Conston	5.10	Draft/revise Opposition to Monarch's motion to dismiss
3/22/2020	Justin Batten	7.00	Draft/revise - Draft memorandum of law in opposition to Moa's motion to dismiss
3/23/2020	Justin Batten	2.90	Draft/revise - Draft memorandum of law in opposition to Moa's motion to dismiss
3/25/2020	Justin Batten	7.30	Draft/revise - Draft memorandum of law in opposition to Moa's motion to dismiss
3/25/2020	Michelle Conston	3.50	Draft/revise opposition to monarch MTD
3/25/2020	Michelle Conston	2.10	Research standard of review
3/26/2020	Michelle Conston	3.00	Draft/revise opposition to monarch MTD



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3/26/2020	Michelle Conston	2.20	Research Legislative history
3/26/2020	Justin Batten	4.00	Communicate (in firm) Draft memorandum of law in opposition to Moa's motion to dismiss
3/27/2020	Justin Batten	1.40	Draft/revise - Draft memorandum of law in opposition to Moa's motion to dismiss
3/27/2020	Justin Batten	1.50	Draft/revise - Draft memorandum of law in opposition to Moa's motion to dismiss
3/27/2020	Michelle Conston	0.50	Communicate (in firm) with JG re: motions to dismiss
3/27/2020	Michelle Conston	4.50	Draft/revise opposition to monarch MTD
3/27/2020	Michelle Conston	2.50	Research Legislative history; insurance definitions
3/27/2020	Joe Guglielmo	0.50	Communicate (in firm) w MC re opp to MTD.
3/28/2020	Justin Batten	4.60	Draft/revise - Draft memorandum of law in opposition to Moa's motion to dismiss
3/29/2020	Justin Batten	4.80	Draft/revise - Draft memorandum of law in opposition to Moa's motion to dismiss
3/30/2020	Justin Batten	2.50	Draft/revise - Draft memorandum of law in opposition to Moa's motion to dismiss
3/30/2020	Michelle Conston	8.00	Draft/revise oppositions to Monarch's and Lloyd's motions to dismiss
3/31/2020	Michelle Conston	7.80	Draft/revise Oppositions to Monarch's and Lloyd's motions to dismiss
4/1/2020	Justin Batten	2.50	Draft/revise - Draft memorandum of law in opposition to Moa's motion to dismiss
4/1/2020	Michelle Conston	5.00	Research Custodians
4/1/2020	Michelle Conston	1.50	Plan and prepare for discovery telephone call
4/2/2020	Michelle Conston	7.20	Draft/revise Oppositions to Monarch's and Lloyd's motions to dismiss
4/2/2020	Justin Batten	7.90	Draft/revise - Draft memorandum of law in opposition to Aloha's motion to dismiss
4/3/2020	Justin Batten	6.70	Draft/revise - Draft memorandum of law in opposition to Aloha's motion to dismiss
4/3/2020	Michelle Conston	3.00	Draft/revise Oppositions to Monarch's and Lloyd's motions to dismiss
4/3/2020	Joe Guglielmo	0.50	Review/analyze and edit opp to MTD.
4/8/2020	Michelle Conston	0.30	Communicate (in firm) speak with JG re: briefing
4/8/2020	Joe Guglielmo	4.50	Draft/revise and review Monarch MTD. Conf w JB re Moa and Aloha MTDs.
4/9/2020	Michelle Conston	3.00	Draft/revise Opposition to Aloha's motions to dismiss
4/9/2020	Michelle Conston	0.30	Communicate (in firm) - speak with JG re: briefing
4/9/2020	Erin Green Comite	6.50	Draft/revise of Monarch motion to dismiss opposition brief.
4/9/2020	Joe Guglielmo	0.60	Communicate (in firm) w MC re edits to OPP to MTD.
4/10/2020	Erin Green Comite	2.50	Draft/revise Monarch Motion to Dismiss opposition brief.
4/10/2020	Justin Batten	0.20	Review/analyze - Review of Michelle Conston's edits to Aloha opposition brief
4/10/2020	Joe Guglielmo	0.40	Communicate (in firm) w EGC re opp to MTD. Conf w J Batten re status of opps.
4/11/2020	Erin Green Comite	3.00	Draft/revise Monarch motion to dismiss opposition brief and legal research regarding same.

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4/12/2020	Michelle Conston	1.50	Draft/revise Opposition to Aloha's motions to dismiss
4/13/2020	Joe Guglielmo	1.60	Review/analyze UJE research, conf w EGC.
4/13/2020	Erin Green Comite	16.00	Draft/revise Monarch motion to dismiss opposition brief and legal research.
4/14/2020	Erin Green Comite	2.00	Research (legal) regarding Section 480-2 and unfairness claim.
4/14/2020	Justin Batten	0.20	Communicate (co-counsel) Call with Jeffrey Foster to discuss opposition to Moa and Aloha motions
4/14/2020	Joe Guglielmo	3.50	Review/analyze Monarch MTD, edit Monarch MTD ,conf w EGC, rev Aloha MTD opp.
4/14/2020	Kaitlin Steinberger	0.30	Communicate (in firm) w/ JB re MTD opps
4/14/2020	Michelle Conston	9.00	Draft/revise Oppositions to Underwriters' motions to dismiss
4/15/2020	Michelle Conston	9.00	Draft/revise Oppositions to Underwriters' motions to dismiss
4/15/2020	Kaitlin Steinberger	1.70	Research re legislative history of HPIA
4/15/2020	Justin Batten	1.50	Communicate (co-counsel) Conferences with Joseph Guglielmo and state court co-counsel re opposition to Moa's and Aloha's motions; follow up review re same (review of letters attached to Aloha's motion)
4/15/2020	Justin Batten	3.00	Draft/revise - Draft declarations for named plaintiffs in support of the oppositions to Moa's and Aloha's motions; reviewing accuracy of information therein
4/15/2020	Erin Green Comite	1.00	Communicate (in firm) with Joe Guglielmo regarding Monarch motion to dismiss opposition.
4/15/2020	Erin Green Comite	6.00	Draft/revise Monarch motion to dismiss opposition brief.
4/15/2020	Joe Guglielmo	1.00	Review/analyze opp to Monarch and Aloha MTD.
4/15/2020	Joe Guglielmo	0.20	Communicate (in firm) with Erin Comite regarding case updates.
4/15/2020	Joe Guglielmo	1.00	Communicate (in firm) with Justin Batten re edits to Aloha opp.
4/15/2020	Joe Guglielmo	1.00	Communicate (co-counsel) regarding client declarations.
4/16/2020	Michelle Conston	9.00	Draft/revise Oppositions to Underwriters' motions to dismiss; Plaintiff declarations
4/16/2020	Erin Green Comite	5.00	Draft/revise Monarch motion to dismiss opposition brief.
4/16/2020	Justin Batten	0.80	Draft/revise - Updates to Aquilina and Corrigan declarations in light of Michelle Conston's edits
4/16/2020	Justin Batten	0.20	Communicate (co-counsel) Calls with Gonzalo Gayoso to discuss status of state court cases and client information
4/16/2020	Justin Batten	0.70	Review/analyze - Review inspection report for Corrigan's home and provide summary in correspondence to Joseph Guglielmo
4/16/2020	Kaitlin Steinberger	2.80	Research re legislative history of HPIA - EM findings to JPG

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4/16/2020	Joe Guglielmo	3.00	Draft/revise and review Aloha, Moa MTD, conf w J Batten.
4/17/2020	Justin Batten	1.30	Draft/revise - Making revisions to memoranda of law in opposition to Moa's and Aloha's motions
4/17/2020	Justin Batten	2.00	Draft/revise - Making revisions to memoranda of law in opposition to Moa's and Aloha's motions
4/17/2020	Michelle Conston	3.00	Draft/revise Oppositions to Underwriters' motions to dismiss
4/17/2020	Michelle Conston	0.30	Communicate (in firm) - speak with JG re: briefing
4/17/2020	Kaitlin Steinberger	0.40	Research requesting archived materials from HI legislature
4/17/2020	Joe Guglielmo	2.70	Draft/revise Monarch insert, conf w MC. Rev and edit Aloha MTD, conf w JB re edits.
4/17/2020	Erin Green Comite	7.00	Draft/revise Monarch motion to dismiss opposition brief.
4/18/2020	Erin Green Comite	3.00	Research (legal) regarding Monarch Motion to Dismiss Opposition brief.
4/18/2020	Justin Batten	3.90	Draft/revise - Making revisions to memoranda of law in opposition to Moa's and Aloha's motions
4/18/2020	Justin Batten	1.00	Draft/revise - Revising Aquilina and Corrigan declarations
4/19/2020	Erin Green Comite	3.00	Research (legal) regarding Monarch Motion to Dismiss Opposition brief.
4/19/2020	Joe Guglielmo	2.40	Draft/revise monarch Opp to MTD.
4/20/2020	Justin Batten	0.60	Draft/revise Revising Aquilina and Corrigan declarations
4/20/2020	Justin Batten	4.50	Draft/revise - Making revisions to memoranda of law in opposition to Moa's and Aloha's motions
4/20/2020	Joe Guglielmo	3.50	Draft/revise opp to Monarch MTD, conf w JB re Moa and Aloha MTDs, review client declarations.
4/20/2020	Michelle Conston	9.00	Draft/revise Oppositions to Underwriters' motions to dismiss
4/20/2020	Erin Green Comite	16.00	Draft/revise Underwriters Motion to Dismiss Opposition brief.
4/21/2020	Erin Green Comite	9.00	Draft/revise Underwriters Motion to Dismiss Opposition brief.
4/21/2020	Joe Guglielmo	0.80	Draft/revise opp to Aloha, rev and edit Moa opp to MTD.
4/21/2020	Michelle Conston	8.50	Draft/revise Oppositions to Underwriters' and Monarch's motions to dismiss
4/21/2020	Justin Batten	4.40	Draft/revise - Making revisions to memoranda of law in opposition to Moa's and Aloha's motions

## Exhibit A to Declaration of Joseph P. Guglielmo

4/21/2020	Justin Batten	2.60	Draft/revise - Revising Aquilina and Corrigan declarations in light of comments received from Al Gayoso, Jeff Foster, and Kirk Wood; calls with Al Gayoso, Shannon Bishop, and Joseph Guglielmo to discuss
4/21/2020	Kaitlin Steinberger	0.40	Draft/revise client declarations in support of MTD opp briefs
4/22/2020	Erin Green Comite	3.00	Draft/revise Monarch Motion to Dismiss Opposition brief.
4/22/2020	Erin Green Comite	7.00	Draft/revise Underwriters Motion to Dismiss Opposition brief.
4/22/2020	Justin Batten	0.20	Research Investigating whether non-resident surplus lines brokers must be registered and licensed
4/22/2020	Justin Batten	1.70	Draft/revise - Making final revisions to Aloha opposition brief and handing off to paralegal
4/22/2020	Michelle Conston	7.00	Draft/revise Oppositions to Underwriters' and Monarch's motions to dismiss
4/23/2020	Joe Guglielmo	0.50	Communicate (in firm) w EGC and MC, conf w JB. Rev docs for opp to MTDs. Conf w MC.
4/23/2020	Michelle Conston	0.20	Communicate (in firm) - speak with JG re: briefing
4/23/2020	Michelle Conston	9.00	Draft/revise Oppositions to Underwriters' and Monarch's motions to dismiss
4/23/2020	Erin Green Comite	6.00	Draft/revise Underwriters Motion to Dismiss Opposition brief.
4/23/2020	Kaitlin Steinberger	4.50	Draft/revise opp to Aloha MTD
4/23/2020	Justin Batten	2.20	Draft/revise - Making final revisions to Moa opposition brief
4/24/2020	Kaitlin Steinberger	4.10	Draft/revise opp to Monarch MTD
4/24/2020	Erin Green Comite	4.00	Draft/revise Underwriters Motion to Dismiss Opposition brief.
4/24/2020	Michelle Conston	5.50	Draft/revise Oppositions to Underwriters' and Monarch's motions to dismiss
4/26/2020	Joe Guglielmo	3.00	Draft/revise Moa and Aloha MTD opps, conf w JB re client declarations.
4/26/2020	Justin Batten	0.20	Draft/revise - Preparing Corrigan declaration for filing; and correspondence with Kaitlin Steinberger re same
4/26/2020	Justin Batten	1.40	Draft/revise - Reviewing and revising Moa opposition brief in light of edits and comments by Joseph Guglielmo
4/27/2020	Justin Batten	5.50	Draft/revise - Review and revise Corrigan and Aquilina declarations; review and revise Moa and Aloha opposition briefs
4/27/2020	Justin Batten	0.20	Communicate (in firm) Confer with Erin Comite re Lucina Aquilina clarification of proposed declaration

## Exhibit A to Declaration of Joseph P. Guglielmo

4/27/2020	Justin Batten	0.20	Communicate (co-counsel) Confer with Gonzalo Gayoso re confirmation of procedural posture of state court cases
4/27/2020	Justin Batten	0.40	Communicate (in firm) Confer with Erin Comite, Michelle Conston, and Joseph Guglielmo re Corrigan and Aquilina declarations, and plan for finalizing briefs
4/27/2020	Justin Batten	0.20	Communicate (co-counsel) Confer with Shannon Bishop re modifications to Aquilina and Corrigan declarations
4/27/2020	Justin Batten	0.60	Communicate (with client) Call with Lucina Aquilina to discuss declaration in support of opposition brief; short debrief call with Joseph Guglielmo afterward
4/27/2020	Michelle Conston	9.00	Draft/revise Oppositions to motions to dismiss
4/27/2020	Joe Guglielmo	4.20	Draft/revise UW and Monarch opp to MTD. Conf w EGC, JB and MC. Conf w client re declarations. Conf w K wood.
4/27/2020	Kaitlin Steinberger	4.10	Draft/revise UDWs and Moa opp briefs
4/27/2020	Kaitlin Steinberger	0.50	Draft/revise Aloha opp brief - insert edits from JB
4/27/2020	Kaitlin Steinberger	0.30	Other: finalize Corrigan's decl and exhibit
4/27/2020	Erin Green Comite	1.00	Communicate (in firm) with Justin Batten, Joe Guglielmo, and Michelle Conston regarding declaration issue; call with Joe Guglielmo regarding same.
4/27/2020	Erin Green Comite	4.00	Draft/revise Underwriters Motion to Dismiss Opposition brief.
4/28/2020	Michelle Conston	9.00	Draft/revise Oppositions to motions to dismiss
4/28/2020	Erin Green Comite	5.50	Draft/revise Motion to Dismiss Opposition briefs.
4/28/2020	Kaitlin Steinberger	3.90	Draft/revise MTD opp briefs (x4) - insert edits from JPG, EGC, MC, JB; pull TOCs and TOAs; finalized and filed all
4/28/2020	Kaitlin Steinberger	0.30	Draft/revise Aquilinas decl - finalized
4/28/2020	Joe Guglielmo	2.80	Draft/revise Moa, Aloha, UW and Monarch MTD opps, conf w EGC re edits.
4/28/2020	Justin Batten	3.80	Draft/revise - Making edits to Moa and Aloha opposition briefs; reviewing final PDFs of filings
4/30/2020	Erin Green Comite	0.50	Review/analyze joinder issues and correspondence with Joe Guglielmo and Michelle Conston regarding same.
4/30/2020	Michelle Conston	0.50	Research Simple agreement joinder
5/1/2020	Michelle Conston	3.50	Research Simple agreement joinder
5/4/2020	Erin Green Comite	4.00	Draft/revise oral argument outline.

## Exhibit A to Declaration of Joseph P. Guglielmo

5/4/2020	Erin Green Comite	0.50	Communicate (in firm) with Joe Guglielmo and Michelle Conston regarding joinder issues.
5/4/2020	Justin Batten	0.20	Plan and prepare for Pulling case summaries of previous round of motions to dismiss and circulating to team
5/4/2020	Michelle Conston	0.30	Communicate (in firm) - Call with Erin Comite and Joe Guglielmo
5/4/2020	Michelle Conston	2.50	Plan and prepare for Oral argument on motions to dismiss
5/4/2020	Joe Guglielmo	0.50	Communicate (in firm) w MC and EGC re oral argument prep and related action notice.
5/4/2020	Joe Guglielmo	0.50	Communicate (in firm) with Erin Green Comite and Michelle Conston regarding joinder issues.
5/5/2020	Justin Batten	0.40	Review/analyze - Reading Moa reply brief
5/5/2020	Michelle Conston	7.50	Plan and prepare for Oral argument on motions to dismiss
5/6/2020	Michelle Conston	7.80	Plan and prepare for Oral argument on motions to dismiss
5/6/2020	Joe Guglielmo	1.00	Communicate (in firm) w MC and JB re replies to MTD and conf re prep for argument.
5/6/2020	Justin Batten	0.70	Review/analyze - Reading Aloha and Moa reply briefs
5/6/2020	Justin Batten	0.30	Communicate (in firm) Call with Joseph Guglielmo to discuss substance of reply brief, and strategy for prepping for oral argument
5/7/2020	Joe Guglielmo	1.00	Communicate (in firm) w MC and JB re replies to MTD and conf re prep for argument.
5/7/2020	Michelle Conston	1.00	Communicate (in firm) with JG and JB regarding replies to MTD and preparation for argument.
5/8/2020	Justin Batten	0.20	Plan and prepare for Call with Joseph Guglielmo to discuss prepping for oral argument
5/8/2020	Justin Batten	2.20	Draft/revise - Preparing case summaries of cases cited in motion to dismiss briefing
5/8/2020	Joe Guglielmo	0.80	Review/analyze replies to MTD, conf w J Batten.
5/8/2020	Joe Guglielmo	1.20	Communicate (in firm) w MC and JB re replies to MTD and conf re prep for argument.

## Exhibit A to Declaration of Joseph P. Guglielmo

5/9/2020	Justin Batten	3.00	Draft/revise - Preparing case summaries of key cases cited in motion to dismiss briefing
5/11/2020	Justin Batten	0.60	Draft/revise - Preparing case summaries of key cases cited in motion to dismiss briefing
5/11/2020	Michelle Conston	2.50	Research joinder motion
5/12/2020	Michelle Conston	2.50	Research joinder motion
5/12/2020	Michelle Conston	1.00	Draft/revise recommendation on joinder motion and send to group
5/12/2020	Michelle Conston	2.50	Plan and prepare for Motion to dismiss oral argument
5/12/2020	Joe Guglielmo	2.30	Draft/revise outline for motion to dismiss argument, conf w EGC.
5/12/2020	Erin Green Comite	2.00	Draft/revise oral argument outline.
5/13/2020	Justin Batten	2.40	Research legal issue of relating a later-filed class action to a currently pending direct action in Hawaii state court
5/13/2020	Erin Green Comite	10.00	Draft/revise oral argument outline.
5/13/2020	Joe Guglielmo	0.40	Review/analyze info for MTD oral argument, conf w J Batten.
5/13/2020	Michelle Conston	6.00	Plan and prepare for Motion to dismiss oral argument
5/14/2020	Michelle Conston	0.50	Communicate (in firm) - Check in with JG
5/14/2020	Michelle Conston	2.00	Plan and prepare for Motion to dismiss oral argument
5/14/2020	Erin Green Comite	4.00	Draft/revise oral argument outline and summary of case law.
5/14/2020	Joe Guglielmo	0.30	Review/analyze info for MTD oral argument, conf w J Batten
5/14/2020	Justin Batten	1.70	Research legal issue of relating a later-filed class action to a currently pending direct action in Hawaii state court
5/15/2020	Erin Green Comite	8.00	Draft/revise oral argument outline and summary of case law.
5/15/2020	Joe Guglielmo	1.20	Plan and prepare for MTD argument, conf w JB, MC and EC.
5/15/2020	Michelle Conston	2.00	Plan and prepare for Motion to dismiss oral argument
5/16/2020	Erin Green Comite	6.00	Plan and prepare for oral argument.
5/16/2020	Joe Guglielmo	1.60	Review/analyze cases prep for MTD argument.
5/17/2020	Joe Guglielmo	5.50	Plan and prepare for MTD oral argument, conf w EGC.

## Exhibit A to Declaration of Joseph P. Guglielmo

5/17/2020	Erin Green Comite	8.00	Plan and prepare for oral argument.
5/18/2020	Erin Green Comite	8.00	Plan and prepare for oral argument.
5/18/2020	Michelle Conston	0.50	Plan and prepare for MTD hearing
5/18/2020	Joe Guglielmo	5.20	Plan and prepare for and rev cases for MTD argument, rev cases. Conf w JB, conf w EGC.
5/18/2020	Joe Guglielmo	5.00	Plan and prepare for and rev cases for MTD argument, rev cases.
5/18/2020	Joe Guglielmo	0.20	Communicate (in firm) with Justin Batten, conf with Erin Comite regarding MTD argument.
5/19/2020	Erin Green Comite	8.00	Plan and prepare for oral argument.
5/19/2020	Erin Green Comite	2.50	Appear for/attend and participate in oral argument.
5/19/2020	Michelle Conston	1.50	Plan and prepare for MTD hearing
5/19/2020	Michelle Conston	4.00	Appear for/attend MTD hearing
5/19/2020	Joe Guglielmo	8.50	Appear for/attend MTD hearing; prep for same, conf w JB, EGC.
5/20/2020	Michelle Conston	0.50	Communicate (in firm) with JG, EGC, JB regarding MTD hearing.
5/20/2020	Joe Guglielmo	0.50	Communicate (in firm) w JB, MC, EGC re MTD hearing.
5/20/2020	Erin Green Comite	0.50	Communicate (in firm) with Joe Guglielmo, Michelle Conston, and Justin Batten regarding Lloyd's hearing.
6/10/2020	Erin Green Comite	1.00	Review/analyze motion to dismiss opinions.
6/10/2020	Joe Guglielmo	1.20	Review/analyze MTD opinions, conf w co counsel.
6/10/2020	Michelle Conston	1.50	Review/analyze motion to dismiss opinions
6/19/2020	Joe Guglielmo	0.30	Communicate (other external) w Ds re stip for answer. Conf w co counsel.
6/21/2020	Joe Guglielmo	0.30	Review/analyze stip for answer. Conf w Ds.
6/23/2020	Michelle Conston	0.60	Review/analyze Lloyd's case re: business interruption
7/1/2020	Michelle Conston	0.50	Draft/revise amended initial disclosures
7/1/2020	Michelle Conston	1.50	Draft/revise Rule 16 conference statement



## Exhibit A to Declaration of Joseph P. Guglielmo

7/1/2020	Michelle Conston	2.50	Research Motion to compel
7/1/2020	Michelle Conston	1.50	Review/analyze document production
7/2/2020	Kaitlin Steinberger	1.80	Draft/revise amended initial disclosures and cert of service re same - insert edits - finalized and EM disclosure to MEC for service on counsel - finalized and filed cert of service
7/2/2020	Joe Guglielmo	0.50	Communicate (in firm) w MC re edits to initial disclosures.
7/2/2020	Michelle Conston	0.50	Draft/revise amended initial disclosures
7/6/2020	Joe Guglielmo	0.30	Communicate (in firm) w MC re status conf, report.
7/6/2020	Kaitlin Steinberger	0.40	Draft/revise cert of service to include missing attorneys - EM to MEC
7/6/2020	Michelle Conston	0.30	Communicate (in firm) with JG regarding status conference.
7/7/2020	Kaitlin Steinberger	0.70	Draft/revise Rule 16 statement
7/9/2020	Joe Guglielmo	0.30	Communicate (in firm) w MC and edit rule 16 statement.
7/9/2020	Michelle Conston	0.10	Communicate (in firm) with JG regarding Rule 16 statement.
7/10/2020	Michelle Conston	0.30	Draft/revise Third Rule 16 conference statement
7/10/2020	Michelle Conston	2.50	Plan and prepare for Rule 16 conference
7/10/2020	Kaitlin Steinberger	0.30	Draft/revise Rule 16 statement - finalized and filed
7/13/2020	Michelle Conston	3.80	Plan and prepare for Rule 16 conference
7/14/2020	Erin Green Comite	0.70	Review/analyze Interrogatories and correspondence with Michelle Conston regarding same.
7/14/2020	Michelle Conston	3.50	Review/analyze Defendants' answers to the complaint
7/14/2020	Michelle Conston	1.00	Review/analyze Aloha's RFPs and Interrogatories
7/14/2020	Michelle Conston	4.80	Research Interrogatories under the Federal Rules
7/14/2020	Michelle Conston	3.50	Draft/revise first set of RFPs
7/15/2020	Erin Green Comite	5.00	Review/analyze of Requests for Production.
7/15/2020	Michelle Conston	1.00	Draft/revise Letter to Aloha's counsel
7/15/2020	Michelle Conston	5.00	Draft/revise first set of RFPs

## Exhibit A to Declaration of Joseph P. Guglielmo

7/15/2020	Michelle Conston	3.50	Research Standard for amending an answer
7/15/2020	Joe Guglielmo	0.50	Communicate (in firm) w M Conston and EGC re discovery and status hearing.
7/16/2020	Erin Green Comite	4.00	Review/analyze Requests for Production and call with Michelle Conston.
7/16/2020	Michelle Conston	3.50	Draft/revise first set of RFPs
7/16/2020	Michelle Conston	0.30	Communicate (in firm) - Call with Erin Comite
7/16/2020	Joe Guglielmo	0.50	Plan and prepare for status hearing. Conf w K Wood, J Foster.
7/17/2020	Joe Guglielmo	1.20	Appear for/attend status hearing and prep for same. Conf w K Wood, M Conston, J Foster, EGC.
7/17/2020	Michelle Conston	2.00	Plan and prepare for Rule 16 conference
7/17/2020	Michelle Conston	0.60	Appear for/attend Rule 16 conference
7/17/2020	Michelle Conston	3.50	Plan and prepare for Rule 16 conference
7/17/2020	Michelle Conston	2.50	Draft/revise first set of RFPs
7/17/2020	Michelle Conston	2.50	Research Standard for amending an answer
7/17/2020	Michelle Conston	0.50	Draft/revise recommendation re: defendants' answers to the complaint
7/17/2020	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo, K. Wood and MEC regarding status hearing updates.
7/20/2020	Michelle Conston	8.50	Communicate (in firm) - Opposition to RFPs
7/21/2020	Michelle Conston	8.50	Communicate (in firm) - Opposition to RFPs
7/21/2020	Michelle Conston	0.80	Draft/revise Letter re: defendant Moa's answer
7/22/2020	Michelle Conston	6.50	Communicate (in firm) - Opposition to RFPs
7/22/2020	Erin Green Comite	4.00	Draft/revise draft Requests for Production.
7/22/2020	Erin Green Comite	1.00	Review/analyze defendants' answers.
7/22/2020	Erin Green Comite	0.70	Communicate (in firm) with Michelle Conston and Joe Guglielmo regarding analysis of defendants' answers and whether to move to strike.
7/22/2020	Joe Guglielmo	0.50	Review/analyze Ds answers, conf w EGC and MC.
7/22/2020	Joe Guglielmo	0.80	Review/analyze RFPS, conf w EGC and CA.
7/23/2020	Joe Guglielmo	0.20	Communicate (in firm) with EGC and MEC regarding case updates and strategy.
7/23/2020	Joe Guglielmo	0.30	Communicate (in firm) with J. Guglielmo regarding language for protective order.

## Exhibit A to Declaration of Joseph P. Guglielmo

7/23/2020	Michelle Conston	0.40	Plan and prepare for and discuss case with J. Guglielmo and E. Comite
7/23/2020	Michelle Conston	1.00	Draft/revise ESI protocol
7/23/2020	Kaitlin Steinberger	0.80	Draft/revise letter to Moa counsel re answer to CPT - EM to MEC
7/23/2020	Erin Green Comite	2.00	Draft/revise Request for Production to defendants.
7/24/2020	Joe Guglielmo	1.80	Review/analyze and edit RFPs, conf w EGC.
7/24/2020	Joe Guglielmo	6.00	Review/analyze Ds answers, conf w EGC and MC.
7/24/2020	Erin Green Comite	4.00	Draft/revise Requests for Production to defendants.
7/24/2020	Erin Green Comite	4.00	Review/analyze defendants' answers and correspondence to Michelle Conston regarding same.
7/24/2020	Michelle Conston	2.50	Research Answers
7/24/2020	Michelle Conston	1.00	Draft/revise Letter re: defendant Aloha's answer
7/24/2020	Michelle Conston	1.00	Draft/revise ESI protocol
7/24/2020	Michelle Conston	1.00	Communicate (in firm) - Opposition to RFPs
7/24/2020	Erin Green Comite	0.50	Communicate (in firm) with Alex Vargas, Carey Alexander, and co-counsel regarding authentication declarations.
7/27/2020	Michelle Conston	1.50	Draft/revise Letter re: defendant Aloha's answer
7/27/2020	Michelle Conston	2.50	Draft/revise Motion to strike
7/27/2020	Erin Green Comite	6.00	Draft/revise Requests for Production.
7/27/2020	Kaitlin Steinberger	0.50	Draft/revise letter to Aloha counsel re answer to amended CPT - EM word and PDF to MEC
7/27/2020	Kaitlin Steinberger	1.00	Draft/revise amended RFPs - EM word and PDF to MEC
7/28/2020	Michelle Conston	2.50	Draft/revise Motion to strike
7/28/2020	Erin Green Comite	1.00	Communicate (in firm) with Joe Guglielmo regarding whether Aloha denied Corrigans' claim.
7/28/2020	Joe Guglielmo	1.30	Review/analyze communications w Aloha for answer, conf w MC and EGC.
7/30/2020	Erin Green Comite	3.00	Review/analyze Goto letter and Aloha Answer and preparation for meet and confer for Motion to Strike.

## Exhibit A to Declaration of Joseph P. Guglielmo

7/30/2020	Erin Green Comite	0.50	Communicate (other external) with defense counsel and Joe Guglielmo and Michelle Conston regarding deficiency in Aloha's Answer and regarding complaint allegations.
7/30/2020	Joe Guglielmo	1.50	Communicate (other external) – m/c w Aloha re answer, affirmative defenses to complaint, prep for call. Conf w MC and EGC.
7/30/2020	Michelle Conston	0.50	Communicate (co-counsel) - Meet and confer with Aloha's counsel
7/30/2020	Michelle Conston	5.50	Draft/revise Motion to strike
7/31/2020	Michelle Conston	0.40	Communicate (in firm) - Discuss case with J. Guglielmo and E. Comite
7/31/2020	Erin Green Comite	0.50	Communicate (in firm) with Michelle Conston and Joe Guglielmo regarding Motion to Strike answer.
7/31/2020	Joe Guglielmo	0.50	Communicate (in firm) w EGC and MC re motion to strike and response.
8/3/2020	Michelle Conston	0.40	Communicate (in firm) with JG and EC regarding edits to protective order.
8/3/2020	Joe Guglielmo	0.40	Communicate (in firm) w MC and EGC re edits to protective order.
8/3/2020	Erin Green Comite	1.00	Review/analyze of protective order language and correspondence to Joe Guglielmo and Michelle Conston regarding same.
8/4/2020	Michelle Conston	0.20	Communicate (in firm) email exchange with JG and EC regarding language for protective order.
8/4/2020	Erin Green Comite	0.50	Communicate (in firm) with Joe Guglielmo regarding language for protective order; email to Michelle Conston regarding same.
8/4/2020	Joe Guglielmo	0.30	Communicate (in firm) with EGC regarding language for protective order.
8/10/2020	Erin Green Comite	2.00	Review/analyze responses to Requests for Production.
8/10/2020	Michelle Conston	2.50	Draft/revise Answer and Opposition to Aloha's RFPs
8/11/2020	Joe Guglielmo	0.50	Communicate (in firm) with EGC regarding certain objections to Aloha's Request for Production.
8/11/2020	Michelle Conston	2.50	Draft/revise Answer and Opposition to Aloha's RFPs
8/11/2020	Erin Green Comite	0.50	Communicate (in firm) with Joe Guglielmo regarding certain objections to Aloha's Requests for Production.
8/11/2020	Erin Green Comite	2.00	Draft/revise responses to Aloha Requests for Production.
8/12/2020	Michelle Conston	4.00	Draft/revise Answer and Opposition to Aloha's RFPs

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8/12/2020	Kaitlin Steinberger	2.20	Draft/revise Corrigan responses and objections to Aloha RFPs - EM to MEC; draft cert of service re responses - finalized and filed
8/12/2020	Joe Guglielmo	0.50	Review/analyze correspondence re RFP and Rog responses, conf w EGC and MC.
8/12/2020	Joe Guglielmo	1.30	Review/analyze info for 30b6 depo. Conf w Ds re discovery schedule.
8/12/2020	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo and MEC regarding case strategy.
8/13/2020	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo and MEC regarding RFPs.
8/13/2020	Joe Guglielmo	0.40	Review/analyze RFPs, conf w MC and EGC.
8/13/2020	Michelle Conston	0.50	Draft/revise Protective order
8/13/2020	Michelle Conston	2.50	Review/analyze Answer and Opposition to Underwriters RFPs
8/13/2020	Kaitlin Steinberger	0.50	Draft/revise cert of service re amended RFPs - finalized and filed
8/13/2020	Kaitlin Steinberger	0.40	Draft/revise amended protective order - finalized and filed
8/14/2020	Kaitlin Steinberger	0.20	Other : EM word version of amended protective order to chambers
8/14/2020	Michelle Conston	5.00	Draft/revise Answer and Opposition to Underwriters RFPs
8/14/2020	Michelle Conston	1.50	Draft/revise Notice of 30b6 deposition
8/14/2020	Joe Guglielmo	0.40	Communicate (in firm) w MC and EGC re discovery responses.
8/14/2020	Erin Green Comite	0.40	Communicate (in firm) with J. Guglielmo and MEC regarding discovery responses.
8/17/2020	Michelle Conston	4.00	Draft/revise Answer and Opposition to Underwriters' RFPs
8/18/2020	Michelle Conston	4.20	Draft/revise Answer and Opposition to Underwriters' RFPs
8/18/2020	Erin Green Comite	0.40	Review/analyze of all outstanding discovery assignments and email to Joe Guglielmo.
8/18/2020	Erin Green Comite	2.00	Research regarding experts on surplus lines insurance.
8/18/2020	Joe Guglielmo	0.20	Communicate (in firm) exchange emails with EGC regarding outstanding discovery assignments.
8/19/2020	Joe Guglielmo	0.30	Communicate (other external) w Ds re discovery schedule.

## Exhibit A to Declaration of Joseph P. Guglielmo

8/21/2020	Michelle Conston	3.50	Draft/revise Answer and Opposition to Underwriters' RFPs
8/21/2020	Erin Green Comite	2.00	Draft/revise Rule 30(b)(6) notice.
8/21/2020	Joe Guglielmo	0.30	Communicate (other external) w Ds re m/c re scheduling.
8/24/2020	Michelle Conston	4.00	Draft/revise Answer and Opposition to Underwriters' RFPs
8/24/2020	Michelle Conston	0.50	Draft/revise Remote deposition protocol
8/24/2020	Kaitlin Steinberger	0.80	Draft/revise remote depo protocol - EM to EGC
8/24/2020	Erin Green Comite	4.50	Draft/revise draft Rule 30(b)(6) notice.
8/25/2020	Michelle Conston	4.00	Draft/revise Answer and Opposition to Underwriters' RFPs
8/25/2020	Michelle Conston	2.50	Draft/revise Rule 30b6 notice
8/26/2020	Joe Guglielmo	0.70	Review/analyze discovery schedule, edit.
8/26/2020	Kaitlin Steinberger	1.80	Draft/revise Aloha & Moa depo notice and COS re same - EM final PDF to MEC for service on all counsel; finalized and filed COS
8/26/2020	Erin Green Comite	0.70	Communicate (other external) with defense counsel regarding case schedule.
8/26/2020	Michelle Conston	0.80	Communicate (other external) - Call with defendants
8/26/2020	Michelle Conston	1.50	Draft/revise Answer and Opposition to Underwriters' RFPs
8/26/2020	Michelle Conston	3.50	Draft/revise Rule 30b6 notice
8/27/2020	Erin Green Comite	1.50	Draft/revise UW and Monarch 30(b)(6) notices.
8/27/2020	Joe Guglielmo	1.30	Draft/revise 30b6 notice. Conf w M Conston and EGC.
8/27/2020	Joe Guglielmo	2.00	Communicate (other external) – m/c w Ds re discovery schedule, conf w Ds. Rev and edit 30b6 notice.
8/27/2020	Michelle Conston	4.00	Draft/revise Answer and Opposition to Underwriters' RFPs
8/27/2020	Michelle Conston	1.50	Review/analyze Defendants' answers to plaintiffs RFPs
8/28/2020	Joe Guglielmo	1.50	Draft/revise edit 30b6 notice. Conf w M Conston and EGC.
8/28/2020	Michelle Conston	3.50	Draft/revise Answer and Opposition to Underwriters' RFPs

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8/28/2020	Kaitlin Steinberger	1.80	Draft/revise depo notices to UDWs and Monarch and cert of service re same - EMs to/from MEC - finalized and served depo notices on all counsel via email - finalized and filed cert of service
8/28/2020	Erin Green Comite	0.30	Communicate (in firm) with J. Guglielmo and MEC regarding RFPs.
8/31/2020	Michelle Conston	4.50	Draft/revise Response to defendants' responses and objections to Plaintiffs' RFPs
9/1/2020	Erin Green Comite	3.50	Draft/revise draft responses to UWs' Requests for Production to Corrigan.
9/1/2020	Erin Green Comite	0.50	Communicate (in firm) with Michelle Conston regarding revision of draft responses to UWs' Requests for Production to Corrigan.
9/1/2020	Michelle Conston	6.50	Draft/revise Response to defendants' responses and objections to Plaintiffs' RFPs
9/2/2020	Michelle Conston	0.50	Communicate (co-counsel) - call with co-counsel
9/2/2020	Erin Green Comite	1.00	Draft/revise Aquilina Requests for Production responses.
9/2/2020	Joe Guglielmo	0.30	Review/analyze objections and responses, memo from MC.
9/3/2020	Michelle Conston	0.50	Communicate (co-counsel) - call with co-counsel
9/4/2020	Joe Guglielmo	0.70	Review/analyze Aquilina discovery objections and responses to RFPs. Conf w EGC and MC.
9/4/2020	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo and MEC regarding discovery objections and responses to RFPs.
9/4/2020	Michelle Conston	0.20	Communicate (in firm) with JG and EC regarding RFPs.
9/8/2020	Michelle Conston	2.80	Draft/revise Answer and Opposition to Underwriters' RFPs
9/8/2020	Michelle Conston	4.50	Draft/revise Response to defendants' responses and objections to Plaintiffs' RFPs
9/8/2020	Joe Guglielmo	1.30	Review/analyze Corrigan objections and responses to RFPs. Conf w EGC and MC.
9/8/2020	Erin Green Comite	0.50	Communicate (in firm) with Joe Guglielmo regarding draft discovery responses.
9/9/2020	Michelle Conston	4.00	Draft/revise Answer and Opposition to Underwriters' RFPs
9/10/2020	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo regarding case updates.
9/10/2020	Kaitlin Steinberger	3.90	Draft/revise plaintiffs resps-objs to UWs first RFPs; draft COS re same
9/10/2020	Joe Guglielmo	1.60	Communicate (other external) w Ds re edits to ESI protocol. Scheduling order.

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9/10/2020	Joe Guglielmo	0.80	Communicate (in firm) w MC re Ps discovery responses. Conf w EGC.
9/11/2020	Joe Guglielmo	1.40	Draft/revise and finalize objections and responses to Ps discovery. Conf w MC and EGC.
9/11/2020	Kaitlin Steinberger	1.00	Draft/revise plaintiffs resp-objs to UWs first RFPs - EM final PDF to MEC for serving on all counsel; finalized and filed COS
9/11/2020	Michelle Conston	1.50	Draft/revise Response to defendants' responses and objections to Plaintiffs' RFPs
9/11/2020	Michelle Conston	2.80	Draft/revise Answer and Opposition to Underwriters' RFPs
9/11/2020	Michelle Conston	1.50	Draft/revise list of persons identified in Ds Initial Disclosures
9/11/2020	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo regarding Ps discovery.
9/13/2020	Joe Guglielmo	0.50	Review/analyze discovery responses, memo from MC.
9/14/2020	Michelle Conston	4.50	Draft/revise Response to defendants' responses and objections to Plaintiffs' RFPs
9/14/2020	Michelle Conston	1.50	Plan and prepare for document production
9/14/2020	Joe Guglielmo	0.70	Plan and prepare for m/c re scheduling order, conf w Ds.
9/14/2020	Joe Guglielmo	1.30	Draft/revise objections and responses to Corrigan discovery responses. Conf w MC.
9/15/2020	Joe Guglielmo	1.30	Communicate (in firm) w MC re edits to discovery, edit ESI protocol; prep for m/c.
9/15/2020	Kaitlin Steinberger	1.00	Draft/revise JPG ltr to M. Shannon re discovery requests - EM to MEC
9/15/2020	Michelle Conston	1.50	Plan and prepare for documents production
9/15/2020	Michelle Conston	4.50	Draft/revise Response to defendants' responses and objections to Plaintiffs' RFPs
9/16/2020	Michelle Conston	4.50	Draft/revise Response to defendants' responses and objections to Plaintiffs' RFPs
9/16/2020	Michelle Conston	1.00	Communicate (other external) - Call with defense counsel to discuss ESI protocol, case schedule, and remote depo protocol
9/16/2020	Michelle Conston	1.50	Plan and prepare for document production



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9/16/2020	Kaitlin Steinberger	0.20	Communicate (in firm) forwarded all CPT docs to MT
9/16/2020	Joe Guglielmo	1.30	Communicate (in firm) w MT re doc production platform, Ps doc review. Conf w MC.
9/16/2020	Joe Guglielmo	1.50	Communicate (other external) m/c w Ds re discovery, scheduling, ESI protocol, and deposition counting.
9/17/2020	Michelle Conston	1.50	Review/analyze defendants' documents
9/18/2020	Erin Green Comite	0.80	Draft/revise ESI protocol.
9/18/2020	Kaitlin Steinberger	1.00	Draft/revise JPG ltr to Goto re discovery responses - EM to MEC
9/18/2020	Michelle Conston	2.00	Draft/revise Response to defendants' responses and objections to Plaintiffs' RFPs
9/18/2020	Michelle Conston	1.50	Review/analyze defendants' documents
9/18/2020	Michelle Conston	1.50	Plan and prepare for document production
9/19/2020	Michelle Conston	2.50	Draft/revise Settlement conference statement
9/21/2020	Michelle Conston	2.50	Draft/revise Settlement conference statement
9/22/2020	Michelle Conston	2.50	Draft/revise Settlement conference statement
9/22/2020	Michelle Conston	1.50	Manage data/files - Prepare documents for production
9/23/2020	Kaitlin Steinberger	0.70	Draft/revise letter to Defense counsel - EM to MEC
9/23/2020	Erin Green Comite	0.50	Draft/revise settlement conference statement.
9/23/2020	Michelle Conston	1.50	Manage data/files - Prepare documents for production
9/23/2020	Michelle Conston	2.50	Draft/revise Settlement conference statement
9/24/2020	Michelle Conston	0.20	Communicate (in firm) with JG regarding document production.
9/24/2020	Joe Guglielmo	0.50	Review/analyze doc production, conf w MC.
9/24/2020	Joe Guglielmo	0.30	Communicate (other external) w Ds re case schedule and depositions.
9/24/2020	Charlie Torres	2.30	Create client production in two formats
9/24/2020	Michelle Conston	1.50	Manage data/files - Prepare documents for production
9/24/2020	Kaitlin Steinberger	3.10	Draft/revise settlement conference statement

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9/25/2020	Kaitlin Steinberger	0.50	Draft/revise settlement conference statement - finalized and submitted to Judge via EM
9/25/2020	Kaitlin Steinberger	0.40	Draft/revise ltr re plaintiffs' production - EM to MEC
9/25/2020	Michelle Conston	2.50	Draft/revise Settlement conference statement
9/25/2020	Michelle Conston	1.50	Manage data/files - Prepare documents for production
9/25/2020	Charlie Torres	1.80	Re-produce documents changing the prefix of two production sets and converting to two different deliverables.
9/25/2020	Joe Guglielmo	0.70	Review/analyze client doc production, conf w MC, conf w MT.
9/25/2020	Mario Tlatenchi	0.20	Communicate (in firm) with JG regarding document production.
9/28/2020	Michelle Conston	0.20	Communicate (in firm) with JG regarding discovery updates.
9/28/2020	Joe Guglielmo	0.30	Review/analyze E&O insurance policies, rev discovery responses, conf w Ds. Conf w MC.
9/29/2020	Joe Guglielmo	1.00	Review/analyze discovery responses, conf w MC.
9/29/2020	Joe Guglielmo	0.30	Communicate (other external) w Magistrate re mediation conference.
9/29/2020	Michelle Conston	0.30	Communicate (in firm) with JG regarding discovery responses.
9/30/2020	Michelle Conston	0.50	Communicate (in firm) - Call with JG
9/30/2020	Charlie Torres	1.60	Convert client pdf documents to eclectically stored information format for production.
9/30/2020	Joe Guglielmo	0.50	Communicate (other external) w Judge Mansfield re settlement conference.
9/30/2020	Joe Guglielmo	1.00	Review/analyze discovery responses, doc production, conf w MC.
10/1/2020	Erin Green Comite	0.30	Communicate (in firm) with J. Guglielmo and MEC regarding production.
10/1/2020	Joe Guglielmo	1.30	Review/analyze discovery responses, client doc production, conf w MC and EGC.

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10/1/2020	Michelle Conston	2.50	Review/analyze Defendants' discovery
10/2/2020	Charlie Torres	1.20	Convert PDF files from defendant (Aloha) production to electronically stored information format.
10/2/2020	Kaitlin Steinberger	0.50	Draft/revise letter to Goto re Aloha discovery responses - EM to MEC
10/2/2020	Erin Green Comite	0.50	Review/analyze defense counsel emails regarding discovery.
10/2/2020	Erin Green Comite	1.50	Review/analyze discovery status and outstanding issues.
10/2/2020	Michelle Conston	1.00	Draft/revise letter to Steve Goto.
10/2/2020	Michelle Conston	3.50	Review/analyze Defendants' discovery
10/2/2020	Joe Guglielmo	1.50	Review/analyze discovery responses, doc production, conf w MC and EGC.
10/5/2020	Erin Green Comite	1.00	Communicate (in firm) with Michelle Conston regarding document production for Plaintiffs.
10/5/2020	Erin Green Comite	2.50	Review/analyze responses to Requests for Production for Plaintiffs' document production.
10/5/2020	Erin Green Comite	0.50	Communicate (in firm) with Joe Guglielmo regarding damages analysis.
10/5/2020	Michelle Conston	3.50	Draft/revise Requests for admission
10/5/2020	Joe Guglielmo	0.80	Draft/revise letter to Ds re discovery deficiencies.
10/6/2020	Michelle Conston	1.00	Communicate (in firm) - call with JG and EGC
10/6/2020	Kaitlin Steinberger	0.80	Draft/revise w/ RLS re filing of notice
10/6/2020	Mario Tlatenchi	0.50	TCW with JG re client collection update; Emails re client e-mail document collection with MEC and client Donna Corrigan.
10/6/2020	Mario Tlatenchi	1.00	Emails with ILS re e-discovery services contract
10/6/2020	Joe Guglielmo	2.00	Review/analyze Ds responses to Pls discovery, conf w A Outwater, MC and EGC.
10/6/2020	Michelle Conston	5.50	Draft/revise Requests for admission
10/6/2020	Alex Outwater	2.00	Review/analyze operative complaint and motion to dismiss opinions
10/6/2020	Alex Outwater	2.50	Review/analyze plaintiffs' amended document requests and defendants' answers
10/6/2020	Erin Green Comite	1.20	Communicate (in firm) with Michelle Conston and Joe Guglielmo regarding Plaintiffs' document collection and production.

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10/6/2020	Erin Green Comite	0.80	Review/analyze UWs' objections to Requests for Production.
10/6/2020	Erin Green Comite	1.50	Review/analyze potential experts.
10/6/2020	Alex Outwater	2.00	Review/analyze operative complaint and motion to dismiss opinions
10/6/2020	Alex Outwater	2.50	Review/analyze plaintiffs' amended document requests and defendants' answers
10/6/2020	Joe Guglielmo	1.20	Communicate (in firm) with Erin Green Comite and Michelle Conston regarding Plaintiffs' document collection and production.
10/7/2020	Joe Guglielmo	1.00	Communicate (in firm) with EC, MEC and AO regarding case updates and strategy.
10/7/2020	Alex Outwater	0.40	Communicate (in firm) Telephone conference with Joe G, Michelle C, and state-court counsel regarding discovery issues
10/7/2020	Alex Outwater	1.00	Communicate (other external) Prepare for and participate in meet-and-confer call with opposing counsel to discuss responses to discovery
10/7/2020	Alex Outwater	0.60	Review/analyze meet-and-confer correspondence from Defendants
10/7/2020	Alex Outwater	4.90	Review/analyze pleadings and discovery provided by Michelle Colson to familiarize myself with the case
10/7/2020	Erin Green Comite	2.00	Review/analyze potential experts.
10/7/2020	Erin Green Comite	1.00	Review/analyze UWs' objections to Requests for Production.
10/7/2020	Erin Green Comite	1.00	Communicate (in firm) with Michelle Conston, Alex Outwater, and Joe Guglielmo regarding discovery assignments.
10/7/2020	Alex Outwater	0.40	Communicate (in firm) Telephone conference with Joe Guglielmo, Michelle Conston, and state-court counsel regarding discovery issues
10/7/2020	Alex Outwater	1.00	Communicate (other external) Prepare for and participate in meet-and-confer call with opposing counsel to discuss responses to discovery
10/7/2020	Alex Outwater	0.60	Review/analyze meet-and-confer correspondence from Defendants
10/7/2020	Alex Outwater	4.90	Review/analyze pleadings and discovery provided by Michelle Colson to familiarize myself with the case
10/7/2020	Joe Guglielmo	2.00	Review/analyze discovery responses, conf w MC re discovery letters, conf w AO.
10/7/2020	Mario Tlatenchi	1.20	emails to ILS re e-discovery Relativity hosting services contract; Telephone call with Michael Amber @ILS follow-up re same; post Defs Aloha & Monarch productions to FTP and provide loading instructions.
10/7/2020	Mario Tlatenchi	2.30	Emails to MEC and JG re follow-up on open items; Zoom Conference call with Client Donna Corrigan and MEC re e-mail document collection.
10/7/2020	Michelle Conston	1.00	Communicate (in firm) - call with JG, AO, and EGC

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10/7/2020	Michelle Conston	0.50	Communicate (other external) - Call with plaintiff
10/7/2020	Michelle Conston	3.50	Draft/revise Requests for admission
10/8/2020	Joe Guglielmo	1.30	Communicate (co-counsel) w K Wood re discovery and plaintiffs' production.
10/8/2020	Michelle Conston	1.00	Communicate (co-counsel) - call with co-counsel
10/8/2020	Erin Green Comite	0.50	Communicate (co-counsel) regarding discovery.
10/8/2020	Alex Outwater	0.50	Communicate (other external) Participate in telephone conference with state-court counsel to discuss discovery issues and document production in their cases
10/8/2020	Alex Outwater	1.60	Review/analyze discovery and meet and confer correspondence in advance of drafting deficiency letter to defendants' counsel
10/8/2020	Alex Outwater	2.00	Research relevant case law to address defendants' responses to discovery
10/8/2020	Alex Outwater	0.50	Communicate (other external) Participate in telephone conference with state-court counsel to discuss discovery issues and document production in their cases
10/8/2020	Alex Outwater	1.60	Review/analyze discovery and meet and confer correspondence in advance of drafting deficiency letter to defendants' counsel
10/8/2020	Alex Outwater	2.00	Research and collecting relevant case law to address defendants' responses to discovery
10/8/2020	Joe Guglielmo	1.00	Communicate (in firm) w MT and MC re doc review.
10/8/2020	Mario Tlatenchi	1.00	Communicate (in firm) with JG and MC re doc review.
10/9/2020	Kaitlin Steinberger	0.40	Draft/revise AO PHV application - finalized and EM to local for filing
10/9/2020	Kaitlin Steinberger	0.40	Draft/revise letter to UDWs re prior productions - EM to JPG
10/9/2020	Mario Tlatenchi	0.20	Emails re update on client Mrs. Corrigan e-mail collection.
10/9/2020	Joe Guglielmo	0.30	Communicate (other external) w UW Ds re production from state case.
10/9/2020	Joe Guglielmo	0.50	Communicate (with client) w clients, MC and K Wood re doc collection.
10/10/2020	Charlie Torres	1.50	Convert defendant production from pdf to electronic stored information format.
10/11/2020	Joe Guglielmo	0.80	Review/analyze discovery responses, conf w MC.

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10/11/2020	Joe Guglielmo	0.30	Communicate (other external) w Ds re production from state case.
10/11/2020	Michelle Conston	0.20	Communicate (in firm) with JG regarding discovery responses.
10/12/2020	Michelle Conston	4.60	Draft/revise first set of rfas
10/12/2020	Michelle Conston	1.50	Draft/revise discovery letter to Monarch
10/12/2020	Michelle Conston	0.50	Communicate (co-counsel) - Call with co-counsel and client
10/12/2020	Michelle Conston	0.50	Draft/revise Search terms
10/12/2020	Charlie Torres	0.90	Setup documents for review and create coding layout.
10/12/2020	Joe Guglielmo	1.40	Review/analyze Monarch doc production, conf w MC.
10/12/2020	Joe Guglielmo	0.40	Review/analyze Monarch's Rogs and RFAs.
10/13/2020	Erin Green Comite	2.00	Review/analyze outstanding discovery assignments and drafting agenda.
10/13/2020	Michelle Conston	2.50	Draft/revise first set of rfas
10/13/2020	Michelle Conston	4.50	Review/analyze Monarch's first document prodction
10/13/2020	Alex Outwater	2.50	Review/analyze Moa document production in Relativity database
10/13/2020	Alex Outwater	1.70	Review/analyze meet and confer letter from Underwriters' counsel regarding plaintiffs' responses to discovery, compare issues raised with plaintiffs' written responses
10/13/2020	Alex Outwater	0.60	Review/analyze Monarch's meet and confer letter, Michelle Conston's email summarizing Monarch's objections to plaintiffs' discovery, and Michelle's comments re same
10/13/2020	Alex Outwater	2.30	Research ase law for meet and confer letter to Underwriters to address their meet and confer letter and our deficiency letter for Underwriters' responses
10/14/2020	Joe Guglielmo	1.20	Communicate (in firm) with EGC, MEC and AO regarding upcoming discovery tasks.
10/14/2020	Alex Outwater	1.20	Communicate (in firm) Telephone conference with Joe Guglielmo, Erin Green-Comite, and Michelle Conston regarding upcoming discovery tasks
10/14/2020	Alex Outwater	0.30	Communicate (in firm) Exchange correspondence with Kaitlin Steinberger regarding status of Pro Hac Vice application
10/14/2020	Alex Outwater	0.30	Review/analyze Monarch's objections to plaintiffs' 30(b)(6) notice and email correspondence re same

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10/14/2020	Alex Outwater	2.00	Research case law for meet and confer letter to Underwriters to address their meet and confer letter and our deficiency letter for Underwriters' responses
10/14/2020	Alex Outwater	3.30	Draft/revise meet and confer letter to Underwriters responding to their letter and addressing deficiencies in their discovery responses
10/14/2020	Kaitlin Steinberger	0.20	Communicate (co-counsel) F/U EM to co-counsel re filing PHV motion
10/14/2020	Kaitlin Steinberger	0.60	Draft/revise amended 30(b)(6) notices (x3) and COS
10/14/2020	Michelle Conston	4.50	Draft/revise discovery letter to monarch
10/14/2020	Michelle Conston	1.00	Communicate (in firm) - Call with JG, ERC, and AO
10/14/2020	Erin Green Comite	1.30	Communicate (in firm) with Michelle Conston, Alex Outwater, and Joe Guglielmo regarding discovery assignments.
10/15/2020	Erin Green Comite	5.00	Draft/revise letter to Monarch.
10/15/2020	Michelle Conston	1.50	Draft/revise discovery letter to Aloha re RFPs
10/15/2020	Michelle Conston	1.00	Draft/revise discovery letter to Aloha re RFPs
10/15/2020	Michelle Conston	3.50	Research re objections to RFPs
10/15/2020	Joe Guglielmo	0.50	Communicate (other external) w UW counsel re discovery.
10/15/2020	Joe Guglielmo	1.50	Draft/revise RFAs w MC.
10/15/2020	Joe Guglielmo	0.40	Review/analyze Monarch production for responsive letter.
10/15/2020	Kaitlin Steinberger	0.30	Draft/revise letter to Defense counsel - EM to MEC
10/15/2020	Kaitlin Steinberger	1.00	Draft/revise amended 30(b)(6) notices; finalized and filed COS
10/15/2020	Kaitlin Steinberger	1.30	Draft/revise letter to Aloha counsel re discovery responses
10/15/2020	Alex Outwater	5.20	Draft/revise meet and confer letter to Underwriters responding to their letter and addressing deficiencies in their discovery responses
10/16/2020	Joe Guglielmo	0.60	Draft/revise letter to Monarch, conf w EGC.

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10/16/2020	Joe Guglielmo	1.60	Draft/revise RFAs, rogs. Rev UW ds letter, conf w AO.
10/16/2020	Erin Green Comite	2.00	Draft/revise letter to Monarch.
10/16/2020	Erin Green Comite	0.50	Review/analyze Monarch documents.
10/16/2020	Michelle Conston	4.50	Research Discovery letter to monarch
10/18/2020	Michelle Conston	3.50	Draft/revise discovery letter to Monarch
10/18/2020	Erin Green Comite	3.00	Research and revision of Monarch discovery letter.
10/18/2020	Joe Guglielmo	2.00	Draft/revise letter to UW ds, conf w AO.
10/18/2020	Alex Outwater	0.30	Communicate (in firm) with JG regarding discovery.
10/19/2020	Erin Green Comite	6.00	Draft/revise Aloha discovery letter.
10/19/2020	Erin Green Comite	1.00	Draft/revise HPIA subpoena.
10/19/2020	Michelle Conston	3.50	Draft/revise Requests for admission
10/19/2020	Michelle Conston	3.50	Draft/revise discovery letter to Monarch
10/19/2020	Kaitlin Steinberger	1.50	Draft/revise RFAs
10/20/2020	Kaitlin Steinberger	1.30	Draft/revise letter to Monarch re discovery responses
10/20/2020	Kaitlin Steinberger	1.50	Draft/revise letter to Aloha re discovery responses
10/20/2020	Alex Outwater	0.80	Communicate (other external) Meet and confer call with Monarch's counsel to discuss amended responses to discovery and deposition scheduling, prepare notes re same
10/20/2020	Alex Outwater	0.70	Review/analyze motion to dismiss transcript and discussion regarding damages
10/20/2020	Alex Outwater	1.30	Review/analyze and coding Moa's document production in Relativity database
10/20/2020	Alex Outwater	1.80	Research regarding the history of the HPIA program and legislative history of the surplus lines act
10/20/2020	Michelle Conston	2.50	Communicate (other external) - Call with Monarch re: Objections to Rule 30b6 notice
10/20/2020	Michelle Conston	3.50	Draft/revise Requests for admission
10/20/2020	Michelle Conston	3.50	Draft/revise responses to interrogatories



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10/20/2020	Joe Guglielmo	2.00	Review/analyze client docs for production. Conf w MC.
10/20/2020	Joe Guglielmo	1.40	Communicate (other external) m/c w Ds re 30(b)(6), prep.
10/20/2020	Joe Guglielmo	0.40	Communicate (other external) w Ds re deposition prep, conf w co counsel.
10/20/2020	Erin Green Comite	1.00	Review/analyze Monarch discovery letter.
10/20/2020	Erin Green Comite	1.00	Review/analyze Aloha discovery letter.
10/20/2020	Erin Green Comite	4.00	Review/analyze Underwriters' discovery letter regarding UW's objections and responses.
10/20/2020	Erin Green Comite	0.50	Communicate (other external) with Monarch to discuss objections to Rule 30(b)(6) notice.
10/21/2020	Erin Green Comite	4.00	Draft/revise interrogatories.
10/21/2020	Erin Green Comite	4.00	Draft/revise Underwriters' discovery letter regarding UWs objections and responses.
10/21/2020	Michelle Conston	0.50	Draft/revise damages table
10/21/2020	Michelle Conston	0.50	Draft/revise agenda for call
10/21/2020	Michelle Conston	3.50	Draft/revise responses to interrogatories
10/21/2020	Michelle Conston	1.50	Draft/revise Requests for admission
10/21/2020	Alex Outwater	1.00	Communicate (in firm) Participate in weekly status call to discuss upcoming assignments in the case
10/21/2020	Alex Outwater	1.40	Review/analyze Underwriters' responses to the Corrigan's written discovery from the state court cases
10/21/2020	Alex Outwater	0.40	Draft/revise meet and confer letter to Underwriters to add missing citations
10/21/2020	Alex Outwater	0.50	Review/analyze Underwriters' initial disclosures for possible meet and confer
10/21/2020	Alex Outwater	0.40	Review/analyze Aloha's initial disclosures for possible meet and confer
10/21/2020	Alex Outwater	0.30	Review/analyze Moa's initial disclosures for possible meet and confer
10/21/2020	Alex Outwater	0.40	Review/analyze Monarch's initial disclosures for possible meet and confer
10/21/2020	Kaitlin Steinberger	2.10	Draft/revise RFAs; drafted certs of service (x4) - finalized and filed
10/21/2020	Kaitlin Steinberger	2.20	Draft/revise letter to Monarch re objections to 30(b)(6) notice
10/21/2020	Joe Guglielmo	1.00	Communicate (in firm) with EGC, MEC and AO regarding discovery updates.

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10/21/2020	Michelle Conston	1.00	Communicate (in firm) - Call with JG, EGC, and AO
10/22/2020	Kaitlin Steinberger	1.70	Draft/revise meet & confer letter to Underwriters
10/22/2020	Alex Outwater	0.80	Research regarding a potential amendment to the complaint to add additional Lloyd's syndicates as defefndants
10/22/2020	Alex Outwater	1.80	Research regarding whether HPIA is an "admitted insurer" for purposes of Hawaii's Surplus Lines Act
10/22/2020	Alex Outwater	0.70	Communicate (other external) Telephone conference with state court counsel regarding discovery issues with defendants in the federal case
10/22/2020	Alex Outwater	2.20	Review/analyze pre-trial statements from Lloyd's and Aloha from the Golden state law case
10/22/2020	Alex Outwater	0.90	Research regarding individuals identified by state law counsel during conference call
10/22/2020	Erin Green Comite	4.00	Draft/revise interrogatories.
10/22/2020	Erin Green Comite	4.00	Draft/revise Underwriter's discovery letter regarding Plaintiff's objections and responses.
10/22/2020	Michelle Conston	1.00	Review/analyze plaintiffs' documents for production
10/22/2020	Michelle Conston	4.50	Draft/revise responses to interrogatories
10/22/2020	Joe Guglielmo	2.30	Draft/revise discovery letter, conf w EGC.
10/22/2020	Joe Guglielmo	1.20	Draft/revise RFAs, conf w MC.
10/22/2020	Charlie Torres	1.20	Create new fields and new coding layout for review.
10/23/2020	Michelle Conston	1.50	Review/analyze and Finalize plaintiffs' documents for production
10/23/2020	Michelle Conston	5.00	Draft/revise responses to interrogatories
10/23/2020	Joe Guglielmo	1.50	Draft/revise discovery letter, conf w EGC.
10/23/2020	Joe Guglielmo	1.10	Draft/revise RFAs, conf w MC.
10/23/2020	Erin Green Comite	1.00	Communicate (in firm) with Joe Guglielmo regarding discovery.
10/23/2020	Erin Green Comite	1.00	Draft/revise interrogatories.
10/23/2020	Erin Green Comite	2.00	Draft/revise Underwriter's discovery letter regarding Plaintiff's objections and responses.

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10/23/2020	Alex Outwater	1.60	Communicate (in firm) Select and circulate emails from Moa's document production with explanations why they could be used as potential exhibits during depositions
10/23/2020	Alex Outwater	2.00	Research potential deponents from Lloyd's and Croton Stokes for potential depositions
10/23/2020	Kaitlin Steinberger	0.40	Draft/revise letter to defense counsel enc discovery
10/23/2020	Kaitlin Steinberger	1.30	Draft/revise meet & confer letter to Underwriters
10/26/2020	Joe Guglielmo	2.30	Review/analyze Moa discovery letter, edit, conf w AO.
10/26/2020	Alex Outwater	0.40	Review/analyze document production for responses to discovery and deposition topics
10/26/2020	Erin Green Comite	4.00	Draft/revise of draft Interrogatories.
10/26/2020	Michelle Conston	4.50	Draft/revise Answers and objections to defendants' interrogatories
10/26/2020	Michelle Conston	1.00	Review/analyze client documents for production
10/27/2020	Michelle Conston	4.50	Draft/revise Answers and objections to defendants' interrogatories
10/27/2020	Michelle Conston	1.00	Review/analyze client documents for production
10/27/2020	Michelle Conston	1.20	Appear for/attend Meet and confer with Aloha counsel
10/27/2020	Michelle Conston	2.00	Appear for/attend Meet and confer with Aloha counsel
10/27/2020	Erin Green Comite	0.70	Communicate (other external) with Aloha defense counsel to meet and confer on discovery issues.
10/27/2020	Erin Green Comite	0.50	Communicate (in firm) with Michelle Conston, Alex Outwater, and Joe Guglielmo to prepare for meet and confer.
10/27/2020	Erin Green Comite	2.00	Draft/revise draft Interrogatories.
10/27/2020	Alex Outwater	0.50	Communicate (in firm) Telephone conference with Joe Guglielmo, Erin Green-Comite, and Michelle Conston to prepare for meet-and-confer call with Aloha's counsel Steve Goto
10/27/2020	Alex Outwater	0.60	Review/analyze subpoenas from Underwriters' counsel to state court plaintiffs
10/27/2020	Alex Outwater	0.60	Review/analyze Underwriters' initial disclosures and discovery responses from the state law cases
10/27/2020	Alex Outwater	2.00	Draft/revise written correspondence to Underwriters requesting that they amend their initial disclosures to include all relevant syndicates

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10/27/2020	Alex Outwater	1.90	Review/analyze Hawaii's surplus lines act to determine whether the HPIA qualifies as an "admitted insurer" for purposes of the statute
10/27/2020	Joe Guglielmo	2.00	Communicate (other external) m/c w Aloha re doc production, deposition schedule.
10/27/2020	Joe Guglielmo	0.40	Communicate (other external) w Monarch re depositions, rev Monarch deposition list.
10/27/2020	Joe Guglielmo	1.30	Review/analyze Moa discovery letter, rev docs for deposition notices.
10/28/2020	Joe Guglielmo	2.30	Draft/revise interrogatory responses for Corrigan, conf w EGC.
10/28/2020	Joe Guglielmo	1.20	Communicate (other external) w UW re deposition schedule, search terms, conf w co counsel.
10/28/2020	Alex Outwater	1.00	Communicate (in firm) Prepare for and participate in weekly telephone conference with Lloyd's team to discuss outstanding tasks
10/28/2020	Alex Outwater	0.40	Review/analyze Monarch's initial disclosures and discovery responses from state law case
10/28/2020	Alex Outwater	1.80	Draft/revise written correspondence to Monarch requesting that they amend their initial disclosures to include identifying information for their witnesses as required by FRCP
10/28/2020	Alex Outwater	4.30	Research regarding absent class member discovery
10/28/2020	Erin Green Comite	4.00	Draft/revise letter to UWs regarding initial disclosures.
10/28/2020	Erin Green Comite	4.00	Draft/revise of draft responses to Aloha Interrogatories.
10/28/2020	Erin Green Comite	0.80	Communicate (in firm) with Michelle Conston, Alex Outwater, and Joe Guglielmo regarding discovery assignments.
10/28/2020	Erin Green Comite	0.40	Draft/revise letter regarding corrected Requests for Production.
10/28/2020	Erin Green Comite	0.70	Draft/revise amended protective order.
10/28/2020	Kaitlin Steinberger	0.30	Draft/revise Corrigan verification
10/28/2020	Kaitlin Steinberger	0.40	Draft/revise second amended stip protective order

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10/28/2020	Kaitlin Steinberger	0.50	Draft/revise letter to counsel re scrivener's error - EM to EGC in word and PDF
10/28/2020	Michelle Conston	0.50	Draft/revise agenda for call
10/28/2020	Michelle Conston	6.00	Draft/revise Answers and objections to defendants' interrogatories
10/28/2020	Michelle Conston	1.00	Communicate (in firm) - Call with JG, EGC, and AO
10/29/2020	Kaitlin Steinberger	1.30	Draft/revise meet & confer letter to Underwriters
10/29/2020	Kaitlin Steinberger	2.80	Draft/revise plaintiffs' first interrogatories to defendants - finalized and EM to MEC; drafted certs of service (x4) for same
10/29/2020	Kaitlin Steinberger	1.30	Draft/revise letter to Monarch re initial disclosures
10/29/2020	Kaitlin Steinberger	1.70	Draft/revise letter to Aloha re discovery responses
10/29/2020	Michelle Conston	2.50	Draft/revise letter re: Meet and confer with Aloha counsel
10/29/2020	Michelle Conston	2.50	Draft/revise Interrogatories to all Ds
10/29/2020	Michelle Conston	3.50	Draft/revise Answers and objections to defendants' interrogatories
10/29/2020	Erin Green Comite	2.00	Draft/revise letter to UWs regarding deficient initial disclosures.
10/29/2020	Erin Green Comite	4.00	Draft/revise responses to Aloha Interrogatories.
10/29/2020	Erin Green Comite	4.00	Research regarding potential witnesses and experts.
10/29/2020	Alex Outwater	4.10	Research regarding use of Hague procedures for deposing party and non-party witnesses in Europe, prepare and circulate summary re same
10/29/2020	Alex Outwater	2.70	Draft/revise list of potential deponents for Moa and Underwriters based on document production and initial disclosures
10/29/2020	Joe Guglielmo	2.00	Draft/revise discovery responses.
10/29/2020	Joe Guglielmo	1.40	Draft/revise m/c w Aloha re deposition.
10/30/2020	Erin Green Comite	4.00	Draft/revise Interrogatories.
10/30/2020	Erin Green Comite	2.00	Review/analyze 30(b)(1) list.
10/30/2020	Erin Green Comite	3.00	Research regarding potential witnesses and experts.
10/30/2020	Michelle Conston	4.00	Draft/revise Answers and objections to defendants' interrogatories

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10/30/2020	Kaitlin Steinberger	0.60	Draft/revise certs of service re interrogatories - finalized and filed
10/30/2020	Joe Guglielmo	0.60	Draft/revise HPIA subpoena.
10/31/2020	Joe Guglielmo	0.80	Draft/revise HPIA subpoena. Conf w EGC.
10/31/2020	Erin Green Comite	0.20	Communicate (in firm) with EGC regarding HPIA subpoena.
11/1/2020	Michelle Conston	1.00	Communicate (other external) - phone call with client
11/1/2020	Erin Green Comite	1.20	Communicate (with client) with Corrigan Plaintiffs regarding Interrogatory responses.
11/2/2020	Alex Outwater	2.30	Review/analyze Telephone conference with co-counsel to discuss discovery and damages issues and overall status of the case
11/2/2020	Alex Outwater	1.20	Review/analyze Telephone conference with co-counsel to discuss discovery and damages issues and overall status of the case
11/2/2020	Erin Green Comite	3.00	Draft/revise responses to Aloha Interrogatories.
11/2/2020	Erin Green Comite	4.00	Draft/revise Aquilina responses to Monarch's Interrogatories.
11/2/2020	Joe Guglielmo	0.80	Draft/revise Rog responses for Corrigan, conf w EGC.
11/2/2020	Michelle Conston	7.00	Draft/revise Answers and objections to defendants' discovery requests
11/2/2020	Kaitlin Steinberger	3.90	Draft/revise Corrigan objections and answers to interrogatories; draft cert of service - finalized and filed
11/3/2020	Kaitlin Steinberger	1.10	Research re Hawaii inter-island travel - EM findings to MEC, JPG, EGC
11/3/2020	Michelle Conston	0.50	Draft/revise answers and objections to defendants' interrogatories
11/3/2020	Michelle Conston	8.00	Draft/revise Answers and objections to defendants' discovery requests
11/3/2020	Michelle Conston	1.20	Communicate (other external) - Meet and confer with Underwriters counsel
11/3/2020	Joe Guglielmo	0.80	Draft/revise Rog responses for Aquilina.

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11/3/2020	Joe Guglielmo	1.20	Communicate (in firm) w AO, EGC and MC re discovery responses. Prep for Moa call.
11/3/2020	Joe Guglielmo	0.60	Review/analyze UW proposal for doc production, prep for meet and confer.
11/3/2020	Erin Green Comite	8.00	Draft/revise Aquilina responses to Monarch's Interrogatories.
11/3/2020	Erin Green Comite	0.50	Communicate (in firm) with Alex Outwater and Michelle Conston regarding discovery tasks.
11/3/2020	Alex Outwater	0.70	Communicate (other external) Telephone conference to meet and confer with Moa regarding written discovery issues
11/3/2020	Alex Outwater	1.20	Draft/revise and prepare log of Moa's document production for today's meet and confer call
11/3/2020	Alex Outwater	2.80	Review/analyze Underwriters' written discovery response in advance of tomorrow's meet and confer call
11/3/2020	Alex Outwater	1.30	Plan and prepare for tomorrow's meet and confer call with Underwriters
11/3/2020	Alex Outwater	0.60	Communicate (other external) Review and analyze correspondence with all counsel regarding deposition scheduling issues
11/4/2020	Erin Green Comite	1.00	Communicate (other external) with UWs' counsel regarding discovery responses.
11/4/2020	Erin Green Comite	0.50	Communicate (co-counsel) regarding potential fact witnesses.
11/4/2020	Erin Green Comite	5.00	Draft/revise Plaintiffs' responses to Monarch's discovery.
11/4/2020	Alex Outwater	1.00	Communicate (other external) Telephone conference with Underwriters' counsel to meet and confer regarding responses to written discovery and 30(b)(6) deposition issues
11/4/2020	Alex Outwater	0.80	Communicate (co-counsel) Telephone conference with state law plaintiffs' counsel to discuss potential experts and witnesses to assist with understanding HPIA and the surplus lines act, prepare and circulate notes re same
11/4/2020	Alex Outwater	0.70	Draft/revise email summarizing meet and confer call with Underwriters' counsel and proposing times for a follow-up call
11/4/2020	Joe Guglielmo	2.30	Communicate (other external) m/c w UW re discovery, prep for call.

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11/4/2020	Joe Guglielmo	1.30	Communicate (co-counsel) re discovery, edits to Aquilina rog responses. Conf w EGC.
11/4/2020	Michelle Conston	0.50	Draft/revise answers and objections to defendants' interrogatories
11/4/2020	Michelle Conston	4.50	Draft/revise Answers and objections to defendants' discovery requests
11/4/2020	Michelle Conston	0.50	Communicate (in firm) - phone call with Erin C. and Joe G. and Alex O.
11/4/2020	Michelle Conston	1.50	Review/analyze plaintiffs' documents
11/5/2020	Kaitlin Steinberger	0.30	Draft/revise client verifications for responses to Monarch Rogs-RFAs-RFPs
11/5/2020	Michelle Conston	0.50	Draft/revise answers and objections to defendants' interrogatories
11/5/2020	Michelle Conston	4.50	Draft/revise Answers and objections to defendants' discovery requests
11/5/2020	Michelle Conston	2.00	Review/analyze plaintiffs' documents
11/5/2020	Erin Green Comite	0.50	Communicate (other external) with Al Gayoso regarding potential fact witnesses.
11/5/2020	Erin Green Comite	4.00	Draft/revise Plaintiffs' responses to Monarch's discovery.
11/5/2020	Erin Green Comite	3.00	Review/analyze potential fact and expert witnesses.
11/5/2020	Joe Guglielmo	0.90	Communicate (co-counsel) re discovery, edits to Aquilina rog responses. Conf w EGC.
11/5/2020	Joe Guglielmo	0.40	Communicate (in firm) w EGC re experts.
11/5/2020	Alex Outwater	1.40	Plan and prepare for tomorrow's meet and confer with Moa's counsel regarding their responses to written discovery
11/5/2020	Alex Outwater	2.50	Research regarding Moa's proposed motion to strike class allegations from plaintiffs' complaint
11/5/2020	Alex Outwater	2.20	Draft/revise memo regarding Ninth Circuit precedent for motions to strike class allegations
11/5/2020	Alex Outwater	0.30	Research Local Rules regarding standards of practice for plaintiffs' proposed motion
11/5/2020	Alex Outwater	0.90	Research relevant cases, correspondence, and discovery responses in preparation for tomorrow's meet and confer with Moa's counsel
11/5/2020	Erin Green Comite	1.00	Communicate (in firm) with Carey Alexander and Joe Guglielmo regarding discovery issues.
11/6/2020	Erin Green Comite	0.80	Communicate (other external) with Laura Craft regarding experts.



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11/6/2020	Erin Green Comite	1.50	Communicate (other external) with Moa counsel regarding discovery responses and drafting memorandum regarding same.
11/6/2020	Joe Guglielmo	0.40	Communicate (other external) w Monarch re doc production and depositions.
11/6/2020	Joe Guglielmo	1.50	Draft/revise Corrigan and Aquilina responses to Monarch ROGs and RFAs.
11/6/2020	Joe Guglielmo	2.20	Communicate (other external) m/c w Moa re doc production, depositions.
11/6/2020	Joe Guglielmo	0.50	Communicate (co-counsel) w L Craft and EGC re experts.
11/6/2020	Michelle Conston	3.00	Draft/revise Answers and objections to defendants' discovery requests
11/6/2020	Michelle Conston	6.00	Review/analyze plaintiffs' documents
11/6/2020	Michelle Conston	1.20	Communicate (other external) - Meet and confer with Moa counsel
11/6/2020	Kaitlin Steinberger	0.60	Draft/revise second amended protective order - finalized and filed; EM word version to judge and all counsel
11/6/2020	Alex Outwater	0.80	Communicate (other external) Participate in follow-up meet and confer with Moa's counsel regarding written discovery issues
11/6/2020	Alex Outwater	1.00	Review/analyze Moa's amended responses to plaintiffs' request for production of documents, circulate comments re same
11/6/2020	Alex Outwater	0.50	Draft/revise meet and confer agenda and materials for today's call with Moa's counsel
11/6/2020	Alex Outwater	0.70	Draft/revise and prepare and circulate summary of today's meet and confer call with Moa
11/6/2020	Alex Outwater	4.60	Draft/revise agenda and materials for follow-up meet and confer with Underwriters
11/7/2020	Michelle Conston	2.10	Communicate (other external) - phone call with client
11/7/2020	Erin Green Comite	2.00	Communicate (with client) Lucina and Steve Aquilina regarding Interrogatory responses.
11/7/2020	Alex Outwater	2.00	Research for deficiency letter to Moa's counsel regarding Moa's amended responses to plaintiffs' first set of requests for production
11/8/2020	Joe Guglielmo	1.30	Draft/revise Aquilina discovery responses, conf w EGC and MC.
11/8/2020	Erin Green Comite	1.00	Draft/revise Interrogatory responses.

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11/8/2020	Erin Green Comite	1.00	Communicate (in firm) with Joe Guglielmo and Michelle Conston regarding Interrogatory responses.
11/8/2020	Michelle Conston	1.00	Communicate (in firm) - phone call with Erin C. and Joe G.
11/8/2020	Michelle Conston	0.50	Draft/revise answers and objections to defendants' interrogatories
11/9/2020	Erin Green Comite	1.00	Communicate (in firm) with Alex Outwater, Michelle Conston, and Joe Guglielmo regarding depositions.
11/9/2020	Erin Green Comite	3.00	Review/analyze documents for deposition preparations.
11/9/2020	Michelle Conston	0.50	Communicate (in firm) - phone call with Erin C. and Joe G. and Alex O.
11/9/2020	Michelle Conston	2.50	Review/analyze documents and draft outline for 30b1 and 30b6 depositions
11/9/2020	Michelle Conston	2.50	Review/analyze plaintiffs documents
11/9/2020	Joe Guglielmo	1.20	Communicate (in firm) w AO, MC and EGC re monarch m/c and depositions.
11/9/2020	Joe Guglielmo	1.80	Draft/revise reponses to ROGS, conf w MC and EGC.
11/9/2020	Alex Outwater	0.70	Plan and prepare for telephone conference with Joe Guglielmo, Erin Green Comite, and Michelle Conston to plan and prepare for upcoming 30(b)(6) depositions of Moa and Aloha
11/9/2020	Alex Outwater	5.80	Draft/revise meet and confer correspondence to Moa's counsel regarding deficiencies in his client's responses to written discovery
11/10/2020	Alex Outwater	2.70	Plan and prepare for meet and confer agenda and marshal discovery materials for meet and confer call with Underwriters' counsel
11/10/2020	Alex Outwater	4.80	Draft/revise deficiency letter to Moa regarding its amended responses to written discovery
11/10/2020	Alex Outwater	0.70	Communicate (other external) Participate in meet and confer call with Underwriters' counsel
11/10/2020	Joe Guglielmo	1.30	Draft/revise discovery responses, prep for UW m/c, conf w MC and EGC.
11/10/2020	Joe Guglielmo	0.30	Communicate (other external) w poss expert.
11/10/2020	Charlie Torres	1.60	Split document (Multi document pdf) into separate documents for attorney review.
11/10/2020	Michelle Conston	1.00	Communicate (other external) - meet and confer with Uws counsel
11/10/2020	Michelle Conston	2.50	Review/analyze documents and draft outline for 30b1 and 30b6 depositions
11/10/2020	Michelle Conston	2.50	Review/analyze plaintiffs documents

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11/10/2020	Erin Green Comite	6.00	Review/analyze potential third party depositions.
11/10/2020	Erin Green Comite	0.90	Communicate (other external) with UW defense counsel regarding discovery responses.
11/11/2020	Michelle Conston	1.00	Communicate (in firm) - Call with Sean Russel re: document review
11/11/2020	Sean Russell	1.00	Communicate (in firm) - Call with Michelle Conston re: document review.
11/11/2020	Kaitlin Steinberger	0.80	Draft/revise 30(b)(1) depo notice and cert of service
11/11/2020	Kaitlin Steinberger	0.60	Research re record request docs - EM to MEC re same
11/11/2020	Erin Green Comite	2.00	Draft/revise HPIA subpoena.
11/11/2020	Erin Green Comite	2.00	Draft/revise Corrigan responses to Aloha Requests for Admissions.
11/11/2020	Erin Green Comite	2.00	Draft/revise Corrigan responses to Monarch discovery.
11/11/2020	Erin Green Comite	0.50	Draft/revise emails to UWs regarding meet and confer.
11/11/2020	Erin Green Comite	0.60	Communicate (other external) with potential expert.
11/11/2020	Charlie Torres	2.10	Remove specific domains and re create batches for attorney review.
11/11/2020	Michelle Conston	2.50	Review/analyze plaintiffs documents
11/11/2020	Michelle Conston	0.50	Communicate (in firm) - phone call with Erin C. and Joe G. and Alex O.
11/11/2020	Michelle Conston	1.00	Communicate (other external) - Call with expert
11/11/2020	Michelle Conston	2.50	Review/analyze documents and draft outline for 30b1 and 30b6 depositions
11/11/2020	Ellen DeWan	3.00	Review/analyze proofread, cite check, final and serve letter for AO
11/11/2020	Joe Guglielmo	1.50	Draft/revise discovery responses, conf w MC and EGC.
11/11/2020	Joe Guglielmo	1.00	Communicate (other external) w poss expert.
11/11/2020	Mario Tlatenchi	1.00	Emails with Veritext court reporting vendor and JG re scheduling of depositions in Hawaii.
11/11/2020	Mario Tlatenchi	0.50	Create the persistant highlighting for Aquilina search terms and updated coding review layout per MEC request.
11/11/2020	Alex Outwater	2.90	Review/analyze legislative history of HPIA and related open source information in preparation for upcoming depositions
11/11/2020	Alex Outwater	1.00	Review/analyze news articles regarding insurance handling of the Kilauea eruption in preparation for upcoming depositions

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11/11/2020	Alex Outwater	0.80	Communicate (other external) Video conference with Chandra Wallace to discuss potential experts
11/11/2020	Alex Outwater	0.70	Communicate (in firm) Video conference with Lloyd's team to discuss upcoming discovery tasks
11/11/2020	Alex Outwater	2.30	Draft/revise confirmatory email summary of meet and confer call and related deadlines to send to Underwriters
11/12/2020	Alex Outwater	5.20	Draft/revise outline for 30(b)(6) deposition of Moa Insurance Services
11/12/2020	Joe Guglielmo	1.30	Review/analyze Corrigan emails for production, conf w MC.
11/12/2020	Michelle Conston	4.50	Review/analyze documents and draft outline for 30b1 and 30b6 depositions
11/12/2020	Michelle Conston	2.50	Review/analyze plaintiffs documents
11/12/2020	Charlie Torres	1.20	Split documents from client not separated correctly.
11/12/2020	Charlie Torres	2.50	Administrative Task.; Litigation Team meeting.
11/12/2020	Erin Green Comite	2.00	Review/analyze discovery issues.
11/12/2020	Kaitlin Steinberger	2.50	Draft/revise HPIA subpoena and notice of same - finalized and filed notice, EM final subpoena to Janis
11/12/2020	Kaitlin Steinberger	1.00	Draft/revise responses to Monarch discovery
11/12/2020	Joe Guglielmo	1.50	Plan and prepare for depositions, conf w MC, MT.
11/12/2020	Mario Tlatenchi	0.30	Communicate (in firm) with Joe Guglielmo regarding upcoming depositions.
11/13/2020	Kaitlin Steinberger	2.10	Draft/revise 30(b)(1) notice, second amended 30(b)(6) notices, and cert of service
11/13/2020	Kaitlin Steinberger	1.00	Research re record request docs - EM to EGC, MEC re same
11/13/2020	Kaitlin Steinberger	3.20	Draft/revise responses to Monarch discovery and cert of service; finalized and filed cert
11/13/2020	Erin Green Comite	2.00	Draft/revise Aquilina and Corrigan responses to Monarch discovery.
11/13/2020	Erin Green Comite	2.00	Review/analyze documents for Moa deposition.

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11/13/2020	Erin Green Comite	2.00	Draft/revise FOIA requests.
11/13/2020	Erin Green Comite	2.00	Draft/revise third party subpoenas.
11/13/2020	Joe Guglielmo	2.00	Plan and prepare for depositions, rev docs.
11/13/2020	Joe Guglielmo	0.70	Communicate (other external) w possible expert, conf w EGC, AO and MC.
11/13/2020	Charlie Torres	1.60	Split muti-document pdf production (AIS002) and convert to relativity format for upload to review platform.
11/13/2020	Michelle Conston	2.50	Review/analyze documents and draft outline for 30b1 and 30b6 depositions
11/13/2020	Michelle Conston	2.50	Review/analyze plaintiffs documents
11/13/2020	Sean Russell	7.50	Review/analyze Aquilina Privilege
11/13/2020	Sean Russell	1.50	Review/analyze Supp. Production
11/13/2020	Alex Outwater	7.70	Draft/revise outline and exhibit selection for 30(b)(6) deposition of Moa Insurance Services
11/15/2020	Alex Outwater	0.40	Communicate (in firm) Exchange email correspondence with Joe Guglielmo regarding Moa 30(b)(6) outline
11/15/2020	Alex Outwater	0.70	Review/analyze Joe Guglielmo's edits to Moa 30(b)(6) deposition outline, make additional edits
11/15/2020	Michelle Conston	2.00	Plan and prepare for Aloha depositions
11/15/2020	Joe Guglielmo	2.50	Plan and prepare for Aloha depositions.
11/16/2020	Mario Tlatenchi	0.40	Communicate (in firm) with Joe Guglielmo and Jonathan Swerdloff with respect to production issues.
11/16/2020	Kaitlin Steinberger	0.30	Draft/revise cert of service re depo notices - finalized and filed
11/16/2020	Kaitlin Steinberger	0.40	Draft/revise client verification for Aloha RFA responses
11/16/2020	Kaitlin Steinberger	0.20	Draft/revise letter to defendants - EM to MEC
11/16/2020	Erin Green Comite	0.80	Communicate (in firm) with team regarding 30(b)(6) deposition preparation.
11/16/2020	Erin Green Comite	1.00	Communicate (other external) with potential expert Mike Low.
11/16/2020	Erin Green Comite	1.00	Communicate (other external) with potential expert Tim Ryles.
11/16/2020	Erin Green Comite	0.50	Communicate (other external) with Chandra regarding potential experts.

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11/16/2020	Erin Green Comite	2.00	Review/analyze documents for deposition preparation.
11/16/2020	Erin Green Comite	2.00	Draft/revise deposition outline.
11/16/2020	Joe Guglielmo	0.30	Review/analyze discovery responses, conf w EGC re Aquilina and Corrigan response.
11/16/2020	Joe Guglielmo	2.70	Plan and prepare for depositions, conf w MC, AO and EGC.
11/16/2020	Joe Guglielmo	0.80	Communicate (other external) w possible expert.
11/16/2020	Sean Russell	3.00	Review/analyze Aqualina pt 4 documents
11/16/2020	Charlie Torres	1.70	Quality control of converted PDF files to review platform format and identify attachments before uploading to review platform.
11/16/2020	Michelle Conston	1.00	Communicate (in firm) - Meet with JG, AO, and EGC
11/16/2020	Michelle Conston	2.00	Plan and prepare for Aloha depositions
11/16/2020	Michelle Conston	3.00	Draft/revise answers and objections to defendants' requests for admissions
11/16/2020	Alex Outwater	0.60	Communicate (in firm) Telephone conference with Joe Guglielmo and Erin Green Comite to discuss prepration for 30(b)(6) deposition of Moa Insurance Services
11/16/2020	Alex Outwater	2.10	Draft/revise outline for Moa 30(b)(6) deposition of Moa Insurance Services
11/16/2020	Alex Outwater	3.00	Review/analyze collect and organize documents to be used as exhibits for the 30(b)(6) deposition of Moa Insurance Services
11/16/2020	Alex Outwater	0.30	Communicate (co-counsel) Review and analyze correspondence with co-counsel regarding status of state court litigation and potential lines of questioning for upcoming depositions
11/17/2020	Alex Outwater	2.40	Review/analyze insurance policies with lava coverage provided by state court counsel Al Gayoso as part of preparation for Moa 30(b)(6) deposition
11/17/2020	Alex Outwater	0.50	Review/analyze chart of HPIA and Lloyd's insurance policies provided by state court counsel Al Gayoso as part of preparation for Moa 30(b)(6) deposition
11/17/2020	Alex Outwater	0.30	Review/analyze correspondence from Aloha production provided by Michelle Conston for potential use in Moa 30(b)(6) deposition
11/17/2020	Alex Outwater	1.80	Review/analyze Moa's motion to deny class certification
11/17/2020	Alex Outwater	0.90	Communicate (in firm) Telephone conference with Lloyd's team to discuss Moa 30(b)(6) deposition preparation
11/17/2020	Alex Outwater	2.00	Draft/revise Moa 30(b)(6) deposition outline and exhibits

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11/17/2020	Charlie Torres	4.80	Isolate defendant production "GOLDEN_UW-01" all documents with attachments and separate for conversion to review platform format.
11/17/2020	Michelle Conston	2.00	Plan and prepare for Aloha depositions
11/17/2020	Michelle Conston	2.00	Plan and prepare for Aloha depositions
11/17/2020	Michelle Conston	4.80	Review/analyze defendants' documents
11/17/2020	Michelle Conston	1.50	Draft/revise answers and objections to defendants' requests for admissions
11/17/2020	Erin Green Comite	3.00	Draft/revise FOIA requests.
11/17/2020	Erin Green Comite	3.00	Draft/revise deposition outline and preparation for deposition.
11/17/2020	Sean Russell	2.50	Review/analyze Aqualina pt 4 documents
11/17/2020	Sean Russell	2.50	Review/analyze Lloyd's documents for potential deposition documents
11/17/2020	Joe Guglielmo	0.50	Review/analyze discovery responses, conf w EGC re Aqualina and Corrigan response.
11/17/2020	Joe Guglielmo	1.10	Plan and prepare for Moa deposition, conf w AO.
11/17/2020	Joe Guglielmo	2.00	Plan and prepare for Aloha deposition, conf w MC.
11/17/2020	Kaitlin Steinberger	1.00	Communicate (other external) w/ Veritext, defense counsel, JPG, EGC, re depositions
11/17/2020	Kaitlin Steinberger	0.30	Draft/revise client verifications for Aloha RFA responses
11/18/2020	Sean Russell	1.50	Communicate (in firm) Aqualina e-mail search prior to 2018 and discussion with Michelle Conston
11/18/2020	Sean Russell	2.50	Review/analyze Lloyd's PDF breaks for potential Depo Docs
11/18/2020	Kaitlin Steinberger	1.10	Communicate (other external) w/ Veritext, defense counsel, JPG, EGC, MEC re depositions
11/18/2020	Kaitlin Steinberger	0.50	Communicate (co-counsel) w/ new co-counsel, KAN re docs to be uploaded and PHV mot
11/18/2020	Erin Green Comite	1.00	Communicate (co-counsel) in the state court litigation.
11/18/2020	Erin Green Comite	1.00	Communicate (other external) with potential expert regarding deposition.

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11/18/2020	Erin Green Comite	1.00	Draft/revise correspondence to state court counsel regarding Interrogatory response issue.
11/18/2020	Joe Guglielmo	4.00	Plan and prepare for Aloha 30(b)(6) deposition, conf w MC.
11/18/2020	Michelle Conston	3.50	Plan and prepare for Aloha depositions
11/18/2020	Michelle Conston	6.00	Review/analyze defendants' documents
11/18/2020	Charlie Torres	2.60	Split productions (AIS003 and AIS004) documents into separate documents and convert to review platform format.
11/18/2020	Charlie Torres	0.80	Administrative Task.; Litigation team meeting.
11/18/2020	Ellen DeWan	0.50	Communicate (in firm) review emails re logistics for depositions, telephone call with KFS re same
11/18/2020	Alex Outwater	0.30	Communicate (other external) Review and analyze email correspondence from Moa's counsel Matt Shannon regarding document production meet and confer
11/18/2020	Alex Outwater	1.00	Communicate (other external) Telephone conference with potential expert Tim Ryles
11/18/2020	Alex Outwater	5.90	Draft/revise Moa 30(b)(6) deposition outline and exhibits
11/19/2020	Alex Outwater	3.00	Draft/revise and finalize outline and document preparation for taking the 30(b)(6) deposition of Moa Insurance Services
11/19/2020	Alex Outwater	6.00	Appear for/attend and take 30(b)(6) deposition of Moa Insurance Services
11/19/2020	Alex Outwater	0.40	Communicate (in firm) Telephone conference with Joe Guglielmo and Erin Green Comite to discuss key testimony in Moa 30(b)(6) deposition
11/19/2020	Michelle Conston	7.00	Appear for/attend Moa depositions
11/19/2020	Erin Green Comite	1.00	Draft/revise correspondence to client regarding discovery responses.
11/19/2020	Erin Green Comite	7.00	Appear for/attend deposition of Judy Moa.
11/19/2020	Erin Green Comite	2.00	Other - prepare for deposition.
11/19/2020	Joe Guglielmo	4.50	Appear for/attend Moa 30(b)(6) deposition and Schmidt 30(b)(1) deposition. Conf w AO, EGC, MC, K Wood.
11/19/2020	Joe Guglielmo	2.70	Plan and prepare for Aloha 30(b)(6) and Schmidt 30(b)(1) deposition.
11/19/2020	Kaitlin Steinberger	1.00	Communicate (other external) w/ Veritext, defense counsel, JPG, EGC re deposition



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11/19/2020	Kaitlin Steinberger	0.50	Communicate (in firm) w/ JPG re depositions
11/19/2020	Kaitlin Steinberger	2.10	Draft/revise Plaintiffs' responses to Aloha RFAs, cert of service - finalized and filed cert of service
11/20/2020	Joe Guglielmo	8.80	Appear for/attend Aloha 30(b)(6) and Schmidt 30(b)(1) deposition. Conf w AO, EGC, MC, K Wood.
11/20/2020	Kaitlin Steinberger	0.80	Communicate (other external) w/ Veritext, defense counsel, JPG, EGC re depositions
11/20/2020	Erin Green Comite	8.00	Appear for/attend deposition of John Greenlee and Marilou Schmidt.
11/20/2020	Erin Green Comite	1.00	Draft/revise deposition outline of Marilou Schmidt.
11/20/2020	Erin Green Comite	1.00	Draft/revise of Aloha 30(b)(6) deposition outline.
11/20/2020	Charlie Torres	1.90	Convert two productions (Aquilina_Monarch002 -003) for quality control and upload to review platform.
11/20/2020	Michelle Conston	2.00	Plan and prepare for Aloha depositions
11/20/2020	Michelle Conston	8.00	Plan and prepare for Second chair deposition of Aloha deponents
11/20/2020	Alex Outwater	5.70	Appear for/attend deposition of Aloha deponents Greenlee and Schmidt
11/20/2020	Alex Outwater	0.70	Review/analyze rough deposition transcript from Moa 30(b)(6) deposition
11/23/2020	Michelle Conston	0.50	Communicate (in firm) - phone call with Erin C. and Joe G. and Alex O.
11/23/2020	Sean Russell	2.50	Review/analyze and tag Aqualina docs per part three with Michelle Conston
11/23/2020	Erin Green Comite	0.50	Communicate (in firm) via call with team regarding further discovery.
11/23/2020	Joe Guglielmo	0.20	Communicate (other external) w HPIA re subpoena.
11/23/2020	Joe Guglielmo	0.50	Review/analyze w HPIA re subpoena.
11/23/2020	Joe Guglielmo	0.80	Communicate (other external) w Ds re depositions, discovery responses.
11/23/2020	Sean Russell	0.50	Communicate (in firm) with Mario Tlatenchi regarding access to documents
11/23/2020	Mario Tlatenchi	0.50	Communicate (in firm) with Sean Russell regarding access to documents.
11/23/2020	Erin Green Comite	0.30	Communicate (in firm) with Alex Outwater regarding further discovery follow-up with Moa.

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11/23/2020	Alex Outwater	0.30	Communicate (in firm) with Erin Comite regarding further discovery follow-up with Moa.
11/24/2020	Kaitlin Steinberger	1.20	Draft/revise Monarch 30(b)(1) & 30(b)(6) notices and cert of service
11/24/2020	Joe Guglielmo	0.50	Communicate (in firm) w MC re depositions, doc production.
11/24/2020	Michelle Conston	0.50	Draft/revise and serve deposition notice
11/24/2020	Alex Outwater	1.80	Draft/revise correspondence to Moa's counsel regarding missing deletion reports discussed at his client's deposition
11/25/2020	Joe Guglielmo	1.20	Communicate (in firm) w MC re depositions, rev docs for depositions and responses to discovery.
11/25/2020	Michelle Conston	0.20	Communicate (in firm) w JG re depositions.
11/25/2020	Alex Outwater	0.30	Review/analyze Underwriters' proposed search terms
11/25/2020	Alex Outwater	0.70	Review/analyze Monarch's RFA responses for meet and confer
11/25/2020	Erin Green Comite	4.00	Draft/revise third party subpoenas.
11/25/2020	Kaitlin Steinberger	0.60	Draft/revise Monarch 30(b)(1) & 30(b)(6) notices and cert of service - finalized and filed cert of service
11/30/2020	Michelle Conston	4.00	Draft/revise meet and confer letters to defendants
11/30/2020	Charlie Torres	0.70	Create a break down of all defendant productions received and if they had to be converted to Relativity format requested by JES.
11/30/2020	Kaitlin Steinberger	0.30	Draft/revise ESI Protocol - redline comparison
11/30/2020	Alex Outwater	1.10	Communicate (in firm) Exchange email correspondence with Joe Guglielmo regarding Underwriters' search terms, revise plaintiffs' response re same
11/30/2020	Alex Outwater	2.30	Review/analyze Monarch's response to Plaintiffs' request for production of documents and related meet and confer letter for additional meet and confer efforts
11/30/2020	Joe Guglielmo	1.10	Review/analyze UW proposal for depositions, rev Monarch objections to RFAs and Rogs. Conf w EGC and Mc re docs and depositions.

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11/30/2020	Erin Green Comite	0.30	Communicate (in firm) with J. Guglielmo and MEC re docs and depositions.
12/1/2020	Alex Outwater	0.80	Communicate (in firm) Internal conference call with Lloyd's team to discuss upcoming discovery tasks
12/1/2020	Alex Outwater	0.80	Review/analyze Monarch's response to Plaintiffs' request for admissions and Joe Guglielmo's comments re same
12/1/2020	Alex Outwater	0.30	Review/analyze email correspondence from Monarch's counsel identifying Monarch's designees for 30(b)(6) deposition topics
12/1/2020	Alex Outwater	2.20	Review/analyze documents produced by Lloyd's Syndicate 2003
12/1/2020	Alex Outwater	0.30	Communicate (in firm) Exchange email correspondence with Erin Green Comite regarding Moa's responses to plaintiffs' requests for production of documents
12/1/2020	Alex Outwater	2.60	Research case law for meet and confer letter to Monarch regarding its responses to plaintiffs' request for admissions
12/1/2020	Alex Outwater	0.50	Draft/revise deficiency letter to Monarch regarding its responses to plaintiffs' request for admissions
12/1/2020	Alex Outwater	0.40	Review/analyze Joe Guglielmo's notes from meet and confer with HPIA and related subpoena
12/1/2020	Erin Green Comite	8.00	Review/analyze Moa document production and drafting deficiency letter.
12/1/2020	Charlie Torres	2.80	Prepare underwriters two productions for upload to review platform for attorney review.; Quality control of defendant two productions for upload to review platform.
12/1/2020	Michelle Conston	3.00	Draft/revise meet and confer letters to defendants
12/1/2020	Sean Russell	0.50	Communicate (in firm) With Michelle Conston and Production team regarding aqualina docs
12/2/2020	Kaitlin Steinberger	2.50	Draft/revise letter to Moa re discovery issues - compiled exhibits to same - finalized and EM to EGC for distribution
12/2/2020	Michelle Conston	1.00	Draft/revise meet and confer letter
12/2/2020	Michelle Conston	3.00	Draft/revise meet and confer letters to defendants
12/2/2020	Joe Guglielmo	0.10	Review/analyze and edit AIS letter re deficient discovery responses. Conf w MC
12/2/2020	Erin Green Comite	1.00	Review/analyze initial disclosures relating to newly identified syndicate.
12/2/2020	Erin Green Comite	5.00	Review/analyze Aloha document production and drafting deficiency letter.
12/2/2020	Erin Green Comite	1.00	Review/analyze Moa Requests for Admission and comments to Joe Guglielmo.

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12/2/2020	Erin Green Comite	0.50	Review/analyze Monarch email regarding 30(b)(6) topics and comments to Joe Guglielmo.
12/2/2020	Erin Green Comite	1.00	Draft/revise and finalize deficiency letter to Moa.
12/2/2020	Alex Outwater	0.30	Communicate (in firm) Exchange email correspondence with Lloyd's team regarding order of witnesses for Monarch depositions
12/2/2020	Alex Outwater	0.40	Draft/revise meet and confer correspondence to Moa regarding its document production deficiencies
12/2/2020	Alex Outwater	0.60	Communicate (in firm) Review and analyze Underwriters' amended disclosures, discuss with Lloyd's team whether newly identified Syndicate should be added as a defendant
12/2/2020	Alex Outwater	0.40	Review/analyze Monarch's amended disclosures
12/2/2020	Alex Outwater	0.70	Research regarding Federal Rules and Local Rules regarding requirements for adding the Syndicate identified in Underwriters' amended disclosures as a defendant
12/2/2020	Alex Outwater	0.30	Communicate (other external) Exchange email correspondence with Moa's counsel regarding the expected duration of the second session of Moa's 30(b)(6) deposition
12/2/2020	Alex Outwater	5.40	Draft/revise deficiency letter to Monarch regarding its responses to plaintiffs' interrogatories
12/2/2020	Alex Outwater	0.30	Communicate (in firm) Telephone conference with Joe Guglielmo to discuss meet and confer letter to Underwriters regarding its responses to plaintiffs' request for admissions
12/2/2020	Joe Guglielmo	0.30	Communicate (in firm) Telephone conference with Alex Outwater to discuss meet and confer letter to Underwriters regarding its responses to plaintiffs' request for admissions
12/3/2020	Alex Outwater	4.50	Draft/revise deficiency letter to Underwriters regarding its responses to plaintiffs' requests for admissions
12/3/2020	Alex Outwater	0.40	Communicate (in firm) Telephone conference with Joe Guglielmo to discuss deficiency correspondence to Underwriters
12/3/2020	Alex Outwater	0.30	Review/analyze Erin Green Comite's edits to Underwriters deficiency letter
12/3/2020	Alex Outwater	0.50	Draft/revise deficiency letter to Underwriters regarding its responses to plaintiffs' requests for admissions based on comments from Joe Guglielmo and Erin Green Comite
12/3/2020	Alex Outwater	0.50	Communicate (other external) Review and analyze email correspondence with defense counsel regarding amending the complaint to add Syndicate 510

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12/3/2020	Kaitlin Steinberger	0.50	Draft/revise letter to Aloha re doc production
12/3/2020	Erin Green Comite	3.00	Review/analyze documents produced by Underwriters.
12/3/2020	Erin Green Comite	1.00	Review/analyze initial disclosures and Underwriters' documents and email to Defendants regarding motion to amend.
12/3/2020	Erin Green Comite	0.50	Communicate (other external) re meet and confer with Underwriters regarding search terms.
12/3/2020	Erin Green Comite	0.80	Review/analyze deficiency letter to Monarch regarding Interrogatory responses.
12/3/2020	Erin Green Comite	0.80	Review/analyze deficiency letter to Underwriters regarding Requests for Admission responses.
12/3/2020	Joe Guglielmo	1.00	Draft/revise AIS letter re deficient discovery responses
12/3/2020	Joe Guglielmo	1.60	Review/analyze Moa objections and responses to ROGs and RFA, edit discovery letter, conf w EGC
12/3/2020	Michelle Conston	6.00	Draft/revise meet and confer letters to defendants
12/4/2020	Charlie Torres	1.60	Convert defendant production "AIS004" to relativity format and upload to review platform for attorney review.
12/4/2020	Michelle Conston	5.00	Draft/revise meet and confer letters to defendants
12/4/2020	Michelle Conston	1.00	Draft/revise third amended complaint and stipulation
12/4/2020	Joe Guglielmo	0.60	Review/analyze and edit Monarch RFA and ROG letter. Conf w AO, EGC
12/4/2020	Joe Guglielmo	1.20	Review/analyze and edit AIS letter re deficient discovery responses
12/4/2020	Joe Guglielmo	0.50	Review/analyze Moa deficiency letter. Conf w AO
12/4/2020	Erin Green Comite	2.50	Draft/revise Moa Requests for Admission deficiency letter.
12/4/2020	Erin Green Comite	6.00	Draft/revise Monarch Requests for Admission deficiency letter.
12/4/2020	Kaitlin Steinberger	1.50	Draft/revise meet & confer letter to Monarch - finalized and EM to counsel
12/4/2020	Kaitlin Steinberger	1.50	Draft/revise letter to Underwriters
12/4/2020	Kaitlin Steinberger	1.00	Draft/revise letter to Moa re RFA responses
12/4/2020	Alex Outwater	0.40	Draft/revise deficiency letter to Monarch regarding its responses to interrogatories
12/4/2020	Alex Outwater	1.10	Draft/revise letter to Moa regarding its responses to plaintiffs' requests for admissions

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12/4/2020	Alex Outwater	0.80	Draft/revise letter to Underwriters regarding its responses to plaintiffs' request for admissions
12/4/2020	Alex Outwater	1.50	Review/analyze Monarch document production in anticipation of potential motion to compel
12/4/2020	Alex Outwater	3.80	Review/analyze Monarch's latest document production consisting of 787 new documents
12/7/2020	Joe Guglielmo	0.80	Review/analyze w UW re discovery responses, conf w EGC, AO and MC
12/7/2020	Alex Outwater	0.20	Communicate (in firm) with JG, EGC, and MEC regarding discovery responses.
12/7/2020	Charlie Torres	2.10	Convert PDF files produced by defendant to Relativity format. Upload to review platform for review.
12/7/2020	Michelle Conston	1.50	Draft/revise stipulation to amend/amended complaint
12/7/2020	Michelle Conston	1.50	Research motions to amend
12/7/2020	Michelle Conston	4.50	Draft/revise letters to Aloha's counsel re RFA responses and interrogatory responses
12/7/2020	Kaitlin Steinberger	0.40	Draft/revise stip re amended complaint
12/7/2020	Kaitlin Steinberger	2.30	Draft/revise letter to Goto re RFAs
12/7/2020	Kaitlin Steinberger	1.10	Draft/revise letter to Goto re interrogatories
12/7/2020	Joe Guglielmo	1.00	Communicate (other external) - conf w Moa re discovery responses, draft and edit letter re Aloha, Moa and Monarch RFAs and Rogs
12/7/2020	Erin Green Comite	2.00	Draft/revise proposed amended complaint and revision to stipulation; correspondence regarding same to defense counsel.
12/7/2020	Erin Green Comite	5.00	Draft/revise Moa Requests for Admission deficiency letter.
12/7/2020	Mario Tlatenchi	0.50	Download and provide production specs for Defs Aquilina_Monarch 12/4 production
12/7/2020	Mario Tlatenchi	0.50	Create new Coding Layout, Depo Prep Review and tags on Relativity to return potential deposition exhibit worthy documents for MEC.
12/7/2020	Mario Tlatenchi	1.00	Locate missing e-mail from client Aquilina that did not make it to Relativity.
12/8/2020	Erin Green Comite	0.50	Communicate (other external) with potential expert Bill Hager.
12/8/2020	Erin Green Comite	1.00	Communicate (in firm) with Joe Guglielmo regarding discovery and experts.
12/8/2020	Erin Green Comite	6.00	Review/analyze documents for deposition and for experts.

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12/8/2020	Joe Guglielmo	1.60	Communicate (other external) - conf w Moa re discovery responses, draft and edit letter re Aloha, Moa and Monarch RFAs and Rogs
12/8/2020	Joe Guglielmo	1.30	Review/analyze w UW re discovery responses, edit letter
12/8/2020	Kaitlin Steinberger	0.30	Communicate (other external) w/ Veritext re 12/15 & 12/16 depos
12/8/2020	Kaitlin Steinberger	1.40	Draft/revise letter to Monarch re RFAs
12/8/2020	Kaitlin Steinberger	0.20	Communicate (in firm) w/ MEC, AMO re depo transcripts
12/8/2020	Michelle Conston	8.00	Plan and prepare for Monarch depositions
12/8/2020	Charlie Torres	1.70	Quality control of defendant production and upload to review platform.
12/8/2020	Alex Outwater	0.20	Communicate (in firm) with MEC and KFS regarding depo transcripts.
12/9/2020	Alex Outwater	1.50	Communicate (in firm) EGC, JG and MEC regarding Moa meet and confer.
12/9/2020	Charlie Torres	2.40	Prepare four (4) defendant underwriters production for upload to review platform. Update depo-prep coding panel.
12/9/2020	Michelle Conston	1.00	Communicate (in firm) - Meet with JG, AO, and EGC
12/9/2020	Michelle Conston	1.00	Communicate (other external) - Meet and confer with Moa's counsel
12/9/2020	Michelle Conston	6.00	Plan and prepare for Monarch depositions
12/9/2020	Kaitlin Steinberger	1.50	Draft/revise stip re amended complaint - compiled exhibits - finalized and filed; EM word version of stip to judge and all counsel
12/9/2020	Kaitlin Steinberger	0.20	Communicate (other external) F/U EM to Veritext re depos; provided list of all counsel to Veritext
12/9/2020	Kaitlin Steinberger	0.30	Draft/revise revised depo notice to Monarch - finalized and EM to MEC
12/9/2020	Joe Guglielmo	1.60	Communicate (other external) - conf w Moa re discovery responses, draft and edit letter re Aloha, Moa and Monarch RFAs and Rogs
12/9/2020	Joe Guglielmo	0.80	Communicate (other external) - conf w UW re discovery responses
12/9/2020	Joe Guglielmo	0.10	Communicate (in firm) - conf w AO and MC re discovery, edit Moa letter
12/9/2020	Joe Guglielmo	3.30	Plan and prepare for Monarch depositions. Conf w EGC
12/9/2020	Erin Green Comite	1.50	Communicate (in firm) with Alex Outwater, Michelle Conston, and Joe Guglielmo regarding Moa meet and confer.

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12/9/2020	Erin Green Comite	0.50	Communicate (other external) with Moa regarding discovery deficiencies.
12/9/2020	Erin Green Comite	6.00	Review/analyze document for deposition of Borisoff.
12/10/2020	Joe Guglielmo	0.70	Review/analyze and edit Aloha letter
12/10/2020	Joe Guglielmo	1.30	Review/analyze client documents for production, conf w MC
12/10/2020	Joe Guglielmo	0.30	Plan and prepare for Monarch depositions. Conf w EGC and MC
12/10/2020	Joe Guglielmo	1.20	Other - m/c w Monarch re discovery responses, conf w AO, EGC
12/10/2020	Erin Green Comite	8.00	Review/analyze document for deposition of Borisoff.
12/10/2020	Erin Green Comite	0.70	Communicate (other external) via call with counsel for Monarch regarding discovery deficiencies.
12/10/2020	Kaitlin Steinberger	0.40	Draft/revise cert of service re depo notice - finalized and filed
12/10/2020	Michelle Conston	1.00	Communicate (other external) - Meet and confer with Monarch's counsel
12/10/2020	Michelle Conston	5.00	Plan and prepare for Monarch depositions
12/10/2020	Charlie Torres	0.80	Locate specific documents using attorney terms and send attorney link to review.
12/10/2020	Alex Outwater	0.30	Communicate (in firm) JG and EGC regarding discovery responses.
12/11/2020	Alex Outwater	0.40	Communicate (in firm) with JG, EGC and MEC regarding depositions.
12/11/2020	Michelle Conston	0.50	Communicate (other external) - Send HPIA production to defendants
12/11/2020	Michelle Conston	2.50	Review/analyze HPIA production
12/11/2020	Sean Russell	0.30	Review/analyze Excel coding for Aqualina
12/11/2020	Erin Green Comite	2.00	Review/analyze Moa Interrogatory responses.
12/11/2020	Erin Green Comite	1.50	Communicate (in firm) with Alex Outwater, Michelle Conston, and Joe Guglielmo regarding discovery disputes.
12/11/2020	Erin Green Comite	2.00	Review/analyze document for deposition of Borisoff.
12/11/2020	Kaitlin Steinberger	0.20	Communicate (other external) w/ Veritext re cancelling 12/15-16 depositions
12/11/2020	Joe Guglielmo	1.20	Communicate (other external) - conf w Ds re Monarch and UW discovery, depositions
12/11/2020	Joe Guglielmo	0.50	Communicate (in firm) - conf w MC, AO and EGC re depositions, Aloha motion to compel
12/11/2020	Joe Guglielmo	0.40	Communicate (in firm) - conf w AO Moa motion to compel
12/14/2020	Joe Guglielmo	0.70	Communicate (other external) - conf w Ds re Monarch and UW discovery
12/14/2020	Joe Guglielmo	1.50	Communicate (in firm) - conf w AO, MC and EGC re discovery production, depositions



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12/14/2020	Joe Guglielmo	2.10	Appear for/attend m/c w Aloha re discovery responses, motion to compel. Prep for call
12/14/2020	Kaitlin Steinberger	0.80	Draft/revise letter to Moa re RFA impasse and briefing schedule - finalized and served on counsel via EM
12/14/2020	Michelle Conston	0.50	Draft/revise letter to steve goto
12/14/2020	Michelle Conston	3.50	Draft/revise discovery responses to Uws and Aloha's RFPs
12/14/2020	Erin Green Comite	0.50	Communicate (in firm) with Joe Guglielmo regarding Borisoff deposition preparation.
12/14/2020	Erin Green Comite	1.00	Review/analyze documents for deposition.
12/14/2020	Alex Outwater	1.50	Communicate (in firm) with JG, EGC and MEC regarding discovery production.
12/15/2020	Michelle Conston	5.50	Draft/revise discovery responses to Uws and Aloha's RFPs
12/15/2020	Michelle Conston	0.50	Review/analyze Uws responses to Interrogatories
12/15/2020	Erin Green Comite	1.00	Communicate (in firm) with Joe Guglielmo regarding Aquilina insurance claim.
12/15/2020	Erin Green Comite	2.50	Review/analyze Monarch documents.
12/15/2020	Joe Guglielmo	0.60	Review/analyze UW objections and responses, conf w EGC
12/15/2020	Joe Guglielmo	0.50	Review/analyze Aloha's responses, email re confirmation of motion to compel
12/15/2020	Joe Guglielmo	1.00	Appear for/attend m/c w UW re discovery, depositions, and motion to extend deadlines
12/16/2020	Alex Outwater	1.00	Communicate (in firm) with JG, EGC and MEC regarding next steps, discovery.
12/16/2020	Joe Guglielmo	1.60	Review/analyze Aloha's objections and responses, m/c re discovery and motion to compel
12/16/2020	Joe Guglielmo	1.00	Appear for/attend m/c w UW re discovery, depositions, and motion to extend deadlines
12/16/2020	Sean Russell	1.00	Communicate (in firm) Document Review call with Erin Comite and Michelle Conston
12/16/2020	Sean Russell	1.80	Review/analyze documents
12/16/2020	Michelle Conston	1.00	Communicate (in firm) - Meet with JG, AO, and EGC
12/16/2020	Michelle Conston	3.50	Draft/revise discovery responses to Uws and Aloha's RFPs
12/16/2020	Charlie Torres	1.60	Prepare defendant third party production for upload to review platform.; Update coding panel.;
12/16/2020	Erin Green Comite	0.50	Draft/revise correspondence to Moa and Aloha regarding extending deadlines.
12/16/2020	Erin Green Comite	6.00	Review/analyze documents for depositions.
12/17/2020	Erin Green Comite	2.00	Draft/revise Big Island Video News subpoena and call with J. Swerdloff.

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12/17/2020	Erin Green Comite	0.50	Review/analyze letter to Moa regarding Interrogatory responses.
12/17/2020	Erin Green Comite	2.00	Draft/revise Plaintiffs' amended objections and responses to UW's Requests for Production.
12/17/2020	Charlie Torres	1.60	Prepare defendant production (MOAFEED005) for upload to review platform.
12/17/2020	Michelle Conston	1.20	Communicate (other external) - Meet and confer with Monarch's counsel
12/17/2020	Michelle Conston	1.00	Communicate (in firm) - document review call with EGC and SR
12/17/2020	Michelle Conston	1.20	Communicate (other external) - Meet and confer with Aloha's counsel
12/17/2020	Michelle Conston	0.50	Communicate (other external) - Meet and confer with Underwriter's counsel
12/17/2020	Joe Guglielmo	1.20	Communicate (other external) - conf w Ds re Monarch and UW discovery, depositions
12/17/2020	Joe Guglielmo	2.70	Appear for/attend m/c w Aloha re discovery responses, motion to compel. Prep for call
12/17/2020	Joe Guglielmo	0.50	Communicate (in firm) - conf w MC, AO and EGC re depositions, Aloha motion to compel
12/17/2020	Joe Guglielmo	0.40	Communicate (in firm) - conf w AO Moa motion to compel
12/17/2020	Alex Outwater	0.40	Communicate (in firm) with JG regarding Motion to Compel.
12/17/2020	Sean Russell	1.00	Communicate (in firm) with EGC and MEC regarding document review.
12/18/2020	Joe Guglielmo	1.30	Review/analyze and edit Moa motion to compel. Conf w AO
12/18/2020	Joe Guglielmo	1.60	Communicate (in firm) - conf w EGC, rev Monarch and UW discovery
12/18/2020	Michelle Conston	4.50	Draft/revise letters to Court re Aloha's counsel re RFA responses and interrogatory responses
12/18/2020	Erin Green Comite	0.50	Draft/revise Moa Requests for Admission letter brief.
12/18/2020	Erin Green Comite	1.00	Review/analyze UW's Interrogatory responses; correspondence to Joe Guglielmo regarding same.
12/18/2020	Erin Green Comite	0.50	Review/analyze Plaintiffs' amended objections and responses to Aloha's Requests for Production.
12/18/2020	Erin Green Comite	2.50	Draft/revise Plaintiffs' amended objections and responses to UW's Requests for Production.
12/18/2020	Erin Green Comite	0.50	Draft/revise Big Island Video News subpoena.
12/18/2020	Ellen DeWan	3.50	Review/analyze proofread, cite check letter brief re insufficient discovery responses
12/19/2020	Michelle Conston	2.00	Draft/revise letters to Court re Aloha's counsel re RFA responses and interrogatory responses
12/19/2020	Joe Guglielmo	1.50	Review/analyze and edit Motion to compel for Moa

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12/20/2020	Alex Outwater	0.60	Communicate (in firm) with JG regarding MOA m/c and Motion.
12/20/2020	Joe Guglielmo	1.50	Review/analyze and edit Motion to compel for AIS rogs, conf w MC
12/20/2020	Joe Guglielmo	1.00	Review/analyze and edit motion for extension of time
12/20/2020	Joe Guglielmo	0.60	Communicate (in firm) - conf w AO re Moa m/c and motion
12/20/2020	Michelle Conston	2.00	Draft/revise letters to Court re Aloha's counsel re RFA responses and interrogatory responses
12/20/2020	Michelle Conston	1.00	Draft/revise stats for stipulation for extension
12/21/2020	Charlie Torres	1.70	Prepare defendant production (AIS006) for upload to review platform.
12/21/2020	Sean Russell	2.00	Review/analyze documents
12/21/2020	Erin Green Comite	3.00	Draft/revise Stipulation to Modify Scheduling Order.
12/21/2020	Erin Green Comite	0.80	Draft/revise correspondence with defense counsel regarding Stipulation to Modify Scheduling Order.
12/21/2020	Erin Green Comite	2.00	Draft/revise Aloha Request for Admission letter to Court.
12/21/2020	Erin Green Comite	1.50	Communicate (in firm) with Joe Guglielmo regarding discovery strategy.
12/21/2020	Erin Green Comite	2.00	Draft/revise to Aloha Interrogatory letter to Court.
12/21/2020	Erin Green Comite	0.80	Draft/revise correspondence to Monarch regarding ALIS.
12/21/2020	Erin Green Comite	1.00	Communicate (in firm) with Joe Guglielmo and Jonathan Swerdloff regarding discovery databases.
12/21/2020	Erin Green Comite	0.80	Draft/revise correspondence to Moa regarding TAM.
12/21/2020	Joe Guglielmo	2.20	Review/analyze and edit Aloha motion to compel Rogs, and motion to compel RFAs
12/21/2020	Joe Guglielmo	0.30	Communicate (other external) - conf w K Wood re doc review
12/21/2020	Joe Guglielmo	1.20	Review/analyze Monarch data, conf w EGC re class wide data. Conf w JS and EGC re data pulls
12/21/2020	Joe Guglielmo	0.80	Communicate (in firm) - conf w EGC and experts re data review
12/21/2020	Joe Guglielmo	0.60	Review/analyze UW RFPs for deficiency letter, conf w AO and EGC
12/21/2020	Alex Outwater	0.30	Communicate (in firm) with JG and EGC regarding RFPs.
12/22/2020	Kelly Hogan	7.00	Review/analyze proof and para edit and file with court letter briefs
12/22/2020	Erin Green Comite	2.50	Draft/revise Aloha Requests for Admissions letter to Court.
12/22/2020	Erin Green Comite	2.50	Draft/revise Aloha Interrogatory letter to Court.
12/22/2020	Erin Green Comite	0.50	Draft/revise letter to UWs regarding production of Lloyd's Minimum Standards.
12/22/2020	Erin Green Comite	0.50	Draft/revise email to Aloha regarding TAM.
12/22/2020	Erin Green Comite	2.00	Review/analyze documents for expert report.

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12/22/2020	Joe Guglielmo	1.70	Appear for/attend m/c w Aloha re doc production
12/22/2020	Joe Guglielmo	1.40	Appear for/attend m/c w UW re discovery responses deposition scheduling. Conf w EGC re UW data, Monarch data
12/22/2020	Sean Russell	3.50	Review/analyze documents
12/23/2020	Joe Guglielmo	1.30	Review/analyze docs for UW deposition, conf w EGC and MC. Conf w AO
12/23/2020	Erin Green Comite	2.00	Draft/revise Aquilina amended objections and responses to UW Requests for Production.
12/23/2020	Erin Green Comite	0.50	Draft/revise Monarch deposition notice.
12/23/2020	Erin Green Comite	0.50	Communicate (in firm) with Michelle Conston regarding assignments.
12/23/2020	Erin Green Comite	1.00	Communicate (in firm) with Joe Guglielmo regarding discovery assignments.
12/23/2020	Erin Green Comite	1.00	Draft/revise correspondence to defendants regarding various discovery deficiencies.
12/23/2020	Erin Green Comite	3.00	Draft/revise and analysis of documents for expert.
12/23/2020	Kelly Hogan	9.00	Review/analyze proof and para edit and correspond on notice of deposition and veritext to set up deposition as well as with all counsel; proof and para edit responses and objections and certificates of service for responses to defendants' requests for pro
12/23/2020	Michelle Conston	0.30	Communicate (in firm) with JG and EGC regarding depositions.
12/23/2020	Alex Outwater	0.30	Communicate (in firm) with JG regarding depositions.
12/28/2020	Michelle Conston	1.50	Draft/revise amended discovery responses
12/28/2020	Michelle Conston	5.80	Plan and prepare for Monarch and Moa depositions
12/28/2020	Erin Green Comite	6.00	Review/analyze documents to send to experts.
12/28/2020	Charlie Torres	1.30	Prepare defendant underwriters production for upload to review platform.
12/28/2020	Joe Guglielmo	0.70	Communicate (other external) - conf w Ds re depositions, conf w AO re depos
12/28/2020	Joe Guglielmo	0.30	Communicate (other external) - conf w expert re class cert work
12/28/2020	Kelly Hogan	7.00	Review/analyze proof and para notices of depos correspond, file COSs, proof and para responses and correspond and file COSs
12/28/2020	Sean Russell	2.50	Review/analyze documents
12/29/2020	Kelly Hogan	3.50	Review/analyze proof and para notices of depos correspond, file COSs, proof and para responses and correspond and file COSs and correspond with Veritext to set up depos
12/29/2020	Erin Green Comite	1.50	Communicate (in firm) with Joe Guglielmo, Michelle Conston, and Alex Vargas regarding depositions.

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12/29/2020	Erin Green Comite	6.50	Review/analyze discovery deficiencies and correspondence with defense counsel regarding same.
12/29/2020	Michelle Conston	1.00	Communicate (in firm) - Call with JG, EC, and AO
12/29/2020	Michelle Conston	6.00	Draft/revise deposition summary
12/29/2020	Joe Guglielmo	1.00	Communicate (in firm) with EGC, MEC and AO regarding discovery updates.
12/29/2020	Alex Outwater	1.00	Communicate (in firm) with JG, EGC and MEC regarding discovery updates.
12/30/2020	Joe Guglielmo	1.00	Communicate (in firm) with EGC, MEC, and AO regarding depositions.
12/30/2020	Alex Outwater	1.00	Communicate (in firm) with EGC, JG and MEC regarding depositions.
12/30/2020	Michelle Conston	1.00	Communicate (in firm) - Call with JG, EC, and AO
12/30/2020	Michelle Conston	0.20	Communicate (other external) - Email defense counsel re discovery
12/30/2020	Erin Green Comite	1.00	Communicate (in firm) with Jonathan Swerdloff regarding discovery and data base issues.
12/30/2020	Erin Green Comite	4.00	Review/analyze discovery deficiencies and correspondence with defense counsel regarding same.
12/30/2020	Kelly Hogan	6.00	Review/analyze proof and para notices of depos correspond, file COSs, proof and para responses and correspond and file COSs and correspond with Veritext to set up depos
12/31/2020	Charlie Torres	3.60	Prepare defendant (Monarch) 5th production for upload to review platform. Quality control of three production from defendants (Aquilina) and upload to review platform.
12/31/2020	Erin Green Comite	4.00	Plan and prepare for UW depositions.
12/31/2020	Michelle Conston	3.50	Draft/revise outline for oral argument
12/31/2020	Michelle Conston	4.00	Draft/revise deposition summary
12/31/2020	Joe Guglielmo	0.30	Communicate (in firm) with Andrew Warker regarding class certification.
1/2/2021	Joe Guglielmo	2.20	Plan and prepare for Aloha motion to compel argument
1/3/2021	Joe Guglielmo	3.00	Plan and prepare for Aloha motion to compel argument
1/3/2021	Joe Guglielmo	1.00	Communicate (in firm) - conf w AO re Moa deposition, rev docs
1/3/2021	Alex Outwater	3.50	Review/analyze documents in Relativity database for upcoming 30(b)(6) deposition of Syndicate 2003
1/4/2021	Michelle Conston	1.00	Communicate (in firm) - Call with JG, EC, and AO
1/4/2021	Michelle Conston	6.80	Plan and prepare for Monarch and Moa depositions
1/4/2021	Michelle Conston	0.50	Appear for/attend Hearing on motions to compel
1/4/2021	Joe Guglielmo	4.00	Review/analyze docs and prep for UW deposition. Conf w EGC, MC and AO
1/4/2021	Joe Guglielmo	0.50	Review/analyze Moa docs, conf w AO re depo, outline

## Exhibit A to Declaration of Joseph P. Guglielmo

1/4/2021	Joe Guglielmo	2.70	Plan and prepare for and argue motion to compel Aloha responses to RFAs, Rogs
1/4/2021	Kelly Hogan	6.00	Review/analyze prepare notices of deposition for witnesses to be deposed correspond with all counsel and veritext to set up depos and prepare certificates of service to be filed with court and file, and prepare transcript request
1/4/2021	Erin Green Comite	0.80	Communicate (in firm) with Joe Guglielmo and Michelle Conston regarding oral argument.
1/4/2021	Erin Green Comite	0.80	Appear for/attend telephonic discovery hearing.
1/4/2021	Erin Green Comite	2.00	Plan and prepare for UWs depositions.
1/4/2021	Erin Green Comite	2.00	Plan and prepare for Moa depositions.
1/4/2021	Alex Outwater	2.80	Plan and prepare for meet and confer telephone conference with Moa's counsel regarding deficiencies in Moa's interrogatory responses
1/4/2021	Alex Outwater	1.20	Review/analyze Underwriters' document production for upcoming 30(b)(6) deposition of Syndicate 2003
1/4/2021	Alex Outwater	1.10	Draft/revise outline for upcoming deposition 30(b)(6) deposition of Moa Insurance Services, and the 30(b)(1) deposition of Judy Moa
1/4/2021	Alex Outwater	0.40	Review/analyze email correspondence from Underwriters' counsel regarding document productions
1/4/2021	Alex Outwater	0.60	Communicate (other external) Telephone conference with Moa's counsel to meet and confer regarding deficiencies in Moa's interrogatory responses
1/4/2021	Alex Outwater	0.20	Review/analyze correspondence from Moa's counsel Matt Shannon regarding status of Moa's anticipated produciton of classwide data
1/4/2021	Alex Outwater	0.30	Review/analyze correspondence from Veritext regarding upcoming Moa depositions
1/4/2021	Alex Outwater	0.20	Communicate (other external) Prepare email correspondence to Veritext regarding continued depo dates for Moa Insurance Services, Judy Moa, and Mark Piersel
1/4/2021	Alex Outwater	0.70	Appear for/attend hearing on motion to compel further responses to interrogatories and request for admissions from Aloha
1/4/2021	Alex Outwater	0.30	Communicate (other external) Exchange email and telephone correspondence with Moa's counsel regarding dates for the continued depositions of Moa Insurance Services, Judy Moa, and Mark Piersel
1/4/2021	Alex Outwater	0.20	Review/analyze MJ Mansfield's order regarding motion to compel
1/4/2021	Alex Outwater	0.50	Communicate (other external) Correspond with Underwriters' counsel via telephone and email to discuss narrowing the scope of Topic 18 for Underwriters' 30(b)(6) deposition

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1/5/2021	Alex Outwater	7.80	Plan and prepare for remainder of 30(b)(6) deposition of Moa Insurance, including revising outline and selecting exhibits
1/5/2021	Alex Outwater	0.30	Review/analyze and revise amended deposition notice for Moa Insurance and Judy Moa
1/5/2021	Erin Green Comite	0.40	Communicate (in firm) with J. Guglielmo regarding depositions.
1/5/2021	Kelly Hogan	2.00	Review/analyze prepare notices of deposition for witnesses to be deposed correspond with all counsel and veritext to set up depos and prepare certificates of service to be filed with court
1/5/2021	Erin Green Comite	4.00	Plan and prepare for UW depositions.
1/5/2021	Joe Guglielmo	5.70	Review/analyze and prep for UW deposition. Conf w EGC, draft outline
1/5/2021	Charlie Torres	2.30	Prepare defendant two productions for upload to review platform for attorney review.
1/5/2021	Michelle Conston	5.50	Plan and prepare for Monarch and Moa depositions
1/6/2021	Joe Guglielmo	1.50	Review/analyze and prep for UW deposition. Conf w AO
1/6/2021	Joe Guglielmo	0.50	Review/analyze rev Moa responses, docs for deposition
1/6/2021	Joe Guglielmo	0.80	Review/analyze data, conf w EGC re fields for production. Conf w Aloha
1/6/2021	Kelly Hogan	2.50	Review/analyze prepare notices of deposition for witnesses to be deposed correspond with all counsel and veritext to set up depos and prepare certificates of service to be filed with court
1/6/2021	Erin Green Comite	1.00	Communicate (in firm) with Michelle Conston, Joe Guglielmo, and Alex Outwater regarding discovery.
1/6/2021	Erin Green Comite	1.00	Communicate (in firm) with Joe Guglielmo regarding discovery.
1/6/2021	Erin Green Comite	2.00	Review/analyze deposition scheduling and document production.
1/6/2021	Erin Green Comite	1.00	Communicate (in firm) with Alex Outwater and Joe Guglielmo regarding deposition preparation.
1/6/2021	Michelle Conston	1.00	Communicate (in firm) with EGC, JG and AO regarding discovery.
1/6/2021	Alex Outwater	8.10	Plan and prepare for Judy Moa's 30(b)(1) deposition, including work on outline and selection of potential exhibits
1/7/2021	Alex Outwater	6.30	Review/analyze Relativity database for documents to use as exhibits during deposition of Syndicate 2003, work on list of potential issues and questions to cover during same
1/7/2021	Alex Outwater	2.10	Review/analyze open source information from the State of Hawaii and USGS in an attempt to match addresses from insurance bordereaux to Lava Zones

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1/7/2021	Michelle Conston	0.30	Communicate (in firm) with JG regarding UW depositions.
1/7/2021	Michelle Conston	0.70	Communicate (in firm) with JG regarding Aloha responses to discovery.
1/7/2021	Erin Green Comite	2.00	Review/analyze documents and outline for Moa 30(b)1 deposition.
1/7/2021	Joe Guglielmo	1.60	Review/analyze docs for UW deposition. Rev discovery responses, conf w AO, EGC and MC re UW depositions
1/7/2021	Joe Guglielmo	0.70	Communicate (in firm) - conf w MC re Aloha responses to discovery
1/7/2021	Joe Guglielmo	1.50	Communicate (in firm) - conf w EGC an AO re Moa deposition, edits to outline
1/8/2021	Joe Guglielmo	2.50	Review/analyze docs and prep for UW deposition. Conf w AO
1/8/2021	Joe Guglielmo	0.40	Communicate (in firm) - conf w AO re Moa deposition
1/8/2021	Erin Green Comite	6.00	Review/analyze documents and revision of outline for Moa 30(b)1 and 30(b)6 depositions.
1/8/2021	Erin Green Comite	0.80	Communicate (in firm) with Alex Outwater and Joe Guglielmo regarding depositions.
1/8/2021	Charlie Torres	2.80	Prepare defendant two production for upload to review platform for attorney review.
1/8/2021	Michelle Conston	2.00	Draft/revise deposition summary
1/8/2021	Alex Outwater	7.20	Review/analyze and selecting documents for use as exhibits during deposition of Syndicate 2003, continue drafting questions for use by Joe Guglielmo during 2003 deposition
1/8/2021	Alex Outwater	1.50	Review/analyze open source information from the State of Hawaii and USGS in an attempt to match addresses from insurance bordereaux to Lava Zones
1/9/2021	Joe Guglielmo	1.60	Review/analyze docs and prep for UW deposition
1/10/2021	Alex Outwater	1.00	Communicate (in firm) calls with JG regarding UW deposition and Moa deposition.
1/10/2021	Joe Guglielmo	2.50	Review/analyze docs and prep for UW deposition. Conf w AO
1/10/2021	Joe Guglielmo	0.40	Communicate (in firm) - conf w AO re Moa deposition
1/11/2021	Erin Green Comite	7.00	Review/analyze exhibits for Monarch deposition.
1/11/2021	Joe Guglielmo	1.70	Plan and prepare for UW 2003 depo. Conf w AO
1/11/2021	Charlie Torres	1.70	Prepare defendant production for upload to review platform for attorney review.
1/11/2021	Michelle Conston	4.00	Plan and prepare for Depositions
1/11/2021	Kelly Hogan	3.50	Review/analyze draft para and correspond on depo notices and filing certificates with court, track on calendar, correspond to retrieve depo transcripts
1/12/2021	Kelly Hogan	2.50	Review/analyze put together service list and correspond with attorneys on case and veritect to ensure all attorneys have access to depos
1/12/2021	Michelle Conston	3.00	Plan and prepare for Depositions



## Exhibit A to Declaration of Joseph P. Guglielmo

1/12/2021	Alex Outwater	7.60	Communicate (in firm) Assist Joe Guglielmo in preparing for deposition of Underwriters' 30(b)(6) deponent John Tremble
1/12/2021	Charlie Torres	1.60	Plaintiff file has been converted to relativity format and uploaded to review platform.
1/12/2021	Joe Guglielmo	4.60	Plan and prepare for UW 2003 depo. Conf w AO re deposition, conf w EGC re depo
1/12/2021	Erin Green Comite	6.00	Review/analyze and prepare for UW depositions.
1/13/2021	Joe Guglielmo	7.00	Plan and prepare for UW 2003 depo
1/13/2021	Erin Green Comite	8.00	Review/analyze and prepare for UW depositions.
1/13/2021	Charlie Torres	1.80	Quality control of incoming defendant production and upload to review platform.
1/13/2021	Alex Outwater	1.20	Communicate (in firm) Telephone conference with Lloyd's team to discuss upcoming depositions and preparations for Underwriters depositions
1/13/2021	Alex Outwater	7.90	Communicate (in firm) Continue assisting Joe Guglielmo with preparation for deposition of Underwriters' 30(b)(6) deponent John Tremble, including selection of exhibits, editing deposition outline, and loading exhibits to Veritext Exhibit Share platform
1/13/2021	Michelle Conston	3.20	Plan and prepare for Depositions
1/13/2021	Kelly Hogan	2.50	Review/analyze review start times for depositions scheduled by veritext and correspond with veritext to have rescheduled for proper time, troubleshoot tech issues with veritext so that all attorneys calendars are correct and make sure all appropriate links sent
1/14/2021	Michelle Conston	4.10	Plan and prepare for Depositions
1/14/2021	Charlie Torres	1.70	Quality control and upload of production to review platform.
1/14/2021	Erin Green Comite	10.00	Appear for/attend Tremble deposition.
1/14/2021	Alex Outwater	6.10	Appear for/attend first day of deposition of Underwriters' 30(b)(6) deponent John Tremble
1/14/2021	Alex Outwater	1.00	Communicate (in firm) Telephone conference with Joe Guglielmo to discuss today's deposition and plan for tomorrow's session
1/14/2021	Alex Outwater	1.20	Review/analyze exhibits for tomorrow's deposition session with Underwriters' witness John Tremble
1/14/2021	Alex Outwater	0.30	Communicate (other external) Send email correspondence to Moe's counsel regarding status of amended interrogatory responses, review and analyze his response to same

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1/14/2021	Alex Outwater	1.50	Draft/revise letter to Apple from co-counsel Nyran Rasche, add section discussing Apple's discovery obligations under FRCP 34
1/14/2021	Joe Guglielmo	10.40	Plan and prepare for and take UW 2003 depo
1/15/2021	Joe Guglielmo	9.50	Plan and prepare for and take UW 2003 depo
1/15/2021	Erin Green Comite	10.00	Appear for/attend Tremble deposition.
1/15/2021	Alex Outwater	5.00	Appear for/attend second day of deposition of Underwriters' 30(b)(6) deponent John Tremble
1/15/2021	Alex Outwater	0.30	Communicate (in firm) Telephone conference with Joe Guglielmo to discuss today's deposition
1/15/2021	Alex Outwater	3.00	Plan and prepare for 30(b)(6) deposition of Moa and 30(b)(1) deposition of Judy Moa
1/15/2021	Charlie Torres	1.40	Prepare defendant production for upload to review platform for attorney review.
1/15/2021	Michelle Conston	3.00	Plan and prepare for Depositions
1/15/2021	Kelly Hogan	3.50	Review/analyze draft para and correspond on depo notices and filing certificates with court, track on calendar
1/16/2021	Erin Green Comite	4.00	Other - Preparation for Borisoff 30(b)(6) deposition.
1/16/2021	Joe Guglielmo	2.00	Plan and prepare for UW 2003 depo
1/17/2021	Joe Guglielmo	3.00	Communicate (in firm) - conf w AO and prep for Moa deposition
1/17/2021	Joe Guglielmo	2.40	Plan and prepare for UW 2003 depo
1/17/2021	Alex Outwater	5.00	Plan and prepare for 30(b)(6) deposition of Moa and 30(b)(1) deposition of Judy Moa
1/17/2021	Michelle Conston	5.00	Plan and prepare for Monarch and Moa depositions
1/17/2021	Erin Green Comite	4.00	Other - Preparation for Borisoff 30(b)(6) deposition.
1/18/2021	Michelle Conston	6.00	Appear for/attend Deposition of Judy Moa
1/18/2021	Michelle Conston	3.00	Plan and prepare for Depositions
1/18/2021	Erin Green Comite	8.00	Other - Preparation for Borisoff 30(b)(6) deposition.
1/18/2021	Michelle Conston	10.00	Plan and prepare for Monarch and Moa depositions
1/18/2021	Alex Outwater	0.90	Communicate (in firm) Telephone conference with Joe Guglielmo to plan and prepare for 30(b)(6) deposition of Moa and 30(b)(1) deposition of Judy Moa
1/18/2021	Alex Outwater	2.90	Draft/revise outline and exhibits for 30(b)(6) deposition of Moa and 30(b)(1) deposition of Judy Moa
1/18/2021	Alex Outwater	5.70	Appear for/attend 30(b)(6) deposition of Moa and 30(b)(1) deposition of Judy Moa

## Exhibit A to Declaration of Joseph P. Guglielmo

1/18/2021	Joe Guglielmo	0.80	Plan and prepare for and attend Moa deposition, conf w AO
1/19/2021	Alex Outwater	2.80	Appear for/attend deposition of Moa witness Mark Piersel
1/19/2021	Alex Outwater	0.30	Communicate (in firm) Telephone conferences with Joe Guglielmo to discuss tomorrow's deposition of Monarch witness Dave Skogstrom
1/19/2021	Alex Outwater	4.90	Communicate (in firm) Assist Joe Guglielmo in preparing for the 30(b)(6) deposition of Monarch and the 30(b)(1) deposition of Monarch witness Dave Skogstrom, including exhibit selection and management
1/19/2021	Michelle Conston	5.50	Plan and prepare for Monarch and Moa depositions
1/19/2021	Michelle Conston	5.00	Appear for/attend Piersel deposition
1/19/2021	Erin Green Comite	4.00	Appear for/attend Piersel deposition.
1/19/2021	Erin Green Comite	4.00	Other - Preparation for Piersel deposition.
1/19/2021	Joe Guglielmo	7.00	Plan and prepare for Monarch (Skogstrom) deposition, rev docs, edit outlines for 30B6 and 30b1
1/19/2021	Michelle Conston	6.00	Appear for/attend Deposition of Mark Piersel
1/19/2021	Michelle Conston	3.00	Plan and prepare for Depositions
1/19/2021	Kelly Hogan	4.50	Review/analyze amend proof para, serve, and file amended depo notices
1/20/2021	Michelle Conston	8.00	Appear for/attend Deposition of Derek Borisoff
1/20/2021	Joe Guglielmo	9.80	Plan and prepare for and take Monarch (Skogstrom) deposition, conf w AO, EGC re docs and prep.
1/20/2021	Erin Green Comite	2.00	Other - Preparation for Skogstrom 30(b)(6) deposition.
1/20/2021	Erin Green Comite	2.00	Appear for/attend Skogstrom deposition.
1/20/2021	Erin Green Comite	4.00	Other - Preparation for Borisoff 30(b)(6) deposition.
1/20/2021	Michelle Conston	5.00	Plan and prepare for Monarch depositions
1/20/2021	Alex Outwater	0.30	Communicate (in firm) Continue planning and preparing for the 30(b)(6) deposition of Monarch and the 30(b)(1) deposition of Monarch witness Dave Skogstrom, including exhibit selection and management
1/20/2021	Alex Outwater	0.50	Communicate (in firm) Telephone conferences with Joe Guglielmo to discuss issues relating to the deposition of Monarch witness Dave Skogstrom
1/20/2021	Alex Outwater	6.60	Appear for/attend deposition of Monarch and the 30(b)(1) deposition of Monarch witness Dave Skogstrom
1/21/2021	Michelle Conston	7.00	Appear for/attend Borisoff 30(b)(6) deposition
1/21/2021	Alex Outwater	4.40	Appear for/attend 30(b)(6) deposition of Monarch CEO Derek Borisoff

## Exhibit A to Declaration of Joseph P. Guglielmo

1/21/2021	Alex Outwater	0.70	Plan and prepare for Telephone conference with Joe Guglielmo to plan and prepare for remaining depositions
1/21/2021	Alex Outwater	3.00	Review/analyze documents in Relativity database in preparation for 30(b)(6) deposition of Syndicate 318
1/21/2021	Charlie Torres	2.20	Quality control and upload of defendant two production to review platform.
1/21/2021	Erin Green Comite	3.00	Other - Preparation for Borisoff 30(b)(6) deposition.
1/21/2021	Erin Green Comite	5.00	Other - Taking 30(b)(6) deposition of Derek Borisoff.
1/21/2021	Erin Green Comite	3.00	Other - Preparation for Borisoff 30(b)(1) deposition.
1/21/2021	Joe Guglielmo	3.70	Appear for/attend Monarch deposition, conf w EGC re docs and prep.
1/21/2021	Michelle Conston	3.00	Plan and prepare for Depositions
1/21/2021	Michelle Conston	4.00	Appear for/attend Deposition of Derek Borisoff
1/22/2021	Joe Guglielmo	2.00	Communicate (in firm) - conf w EGC re Monarch deposition, prep for depo.
1/22/2021	Charlie Torres	1.30	Prepare defendant production for upload to review platform.
1/22/2021	Erin Green Comite	3.00	Other - Preparation for Borisoff 30(b)(1) deposition.
1/22/2021	Erin Green Comite	3.00	Other - Taking 30(b)(1) deposition of Derek Borisoff.
1/22/2021	Erin Green Comite	2.00	Draft/revise Motion for Class Certification.
1/22/2021	Alex Outwater	7.30	Review/analyze documents and drafting outline in preparation for 30(b)(6) deposition of Syndicate 318
1/22/2021	Michelle Conston	0.50	Plan and prepare for Monarch and Moa depositions
1/22/2021	Michelle Conston	4.00	Appear for/attend Borisoff 30(b)(1) deposition
1/23/2021	Joe Guglielmo	2.20	Plan and prepare for 2003 deposition, rev docs
1/23/2021	Joe Guglielmo	0.20	Communicate (other external) - conf w possible damages expert
1/23/2021	Erin Green Comite	2.00	Plan and prepare for Dawson deposition.
1/23/2021	Erin Green Comite	2.00	Research standard in Ninth Circuit for class certification motion.
1/24/2021	Joe Guglielmo	2.60	Plan and prepare for 2003 deposition, rev docs. Conf w AO re UW 318 deposition
1/25/2021	Joe Guglielmo	4.30	Review/analyze and prep for 2003 deposition re compliance
1/25/2021	Erin Green Comite	1.00	Communicate (in firm) via call with Joe Guglielmo regarding Dawson deposition preparation.
1/25/2021	Erin Green Comite	1.00	Communicate (in firm) with Joe Guglielmo, Alex Outwater, and Michelle Conston regarding class certification.
1/25/2021	Erin Green Comite	2.00	Draft/revise motion for class certification.
1/25/2021	Michelle Conston	1.00	Communicate (in firm) with EGC, JG, AO regarding class certification.

## Exhibit A to Declaration of Joseph P. Guglielmo

1/25/2021	Alex Outwater	1.10	Communicate (in firm) Telephone conference with Joe Guglielmo, Erin Comite, and Michelle Conston to discuss class certification briefing issues
1/25/2021	Alex Outwater	4.50	Review/analyze documents in Relativity database for use in 30(b)(6) deposition of Syndicate 318
1/25/2021	Charlie Torres	2.30	Prepare defendant (Aloha) production for upload to review platform.; Download (67) excel spreadsheets from review platform manually and forward to attorney.
1/26/2021	Alex Outwater	6.00	Appear for/attend 30(b)(6) deposition of Syndicate 2003 witness Simon Dawson
1/26/2021	Alex Outwater	3.70	Plan and prepare for 30(b)(6) deposition of Syndicate 318 witness Steve Anderson
1/26/2021	Michelle Conston	0.30	Communicate (in firm) with EGC regarding data for damages and subpoenas and policies.
1/26/2021	Erin Green Comite	4.00	Appear for/attend deposition of Simon Dawson.
1/26/2021	Erin Green Comite	2.00	Review/analyze data for damages and communications with Michelle regarding same.
1/26/2021	Erin Green Comite	0.50	Draft/revise subpoenas and policies and communications with Michelle regarding same.
1/26/2021	Joe Guglielmo	6.00	Plan and prepare for and take 2003 deposition
1/26/2021	Kelly Hogan	1.00	Review/analyze research on property lava zones
1/27/2021	Kelly Hogan	5.00	Review/analyze draft proof and para subpoenas and correspond
1/27/2021	Joe Guglielmo	2.00	Review/analyze expert report, edit. Conf w EGC
1/27/2021	Joe Guglielmo	1.40	Communicate (other external) - conf w Ds re motion to deny and motion for class cert briefing
1/27/2021	Joe Guglielmo	2.30	Plan and prepare for 318 depo, conf w AO. Rev documents
1/27/2021	Joe Guglielmo	0.40	Communicate (other external) - conf w possible expert for claims data. Conf w EGC
1/27/2021	Erin Green Comite	1.00	Communicate (other external) with potential expert regarding data.
1/27/2021	Erin Green Comite	4.00	Review/analyze data for damages and communications with Michelle regarding same.
1/27/2021	Erin Green Comite	1.00	Review/analyze subpoenas and policies and communications with Michelle regarding same.
1/27/2021	Erin Green Comite	0.30	Communicate (other external) with all counsel to meet and conf on motions.
1/27/2021	Erin Green Comite	2.00	Communicate (in firm) with Joe Guglielmo and Alex Outwater to prepare for 318 deposition and review of documents and outline.

## Exhibit A to Declaration of Joseph P. Guglielmo

1/27/2021	Michelle Conston	1.00	Communicate (in firm) with EGC regarding data for damages and review subpoenas and policies.
1/27/2021	Alex Outwater	0.20	Communicate (other external) Telephone conference to meet and confer with defense counsel pursuant to Local Rules regarding motion for class certification
1/27/2021	Alex Outwater	0.50	Communicate (in firm) Telephone conference with Joe Guglielmo and Erin Comite to discuss tomorrow's 30(b)(6) deposition of Syndicate 318
1/27/2021	Alex Outwater	11.00	Review/analyze outline and selection of exhibits for for 30(b)(6) deposition of Syndicate 318 witness Steve Anderson
1/28/2021	Alex Outwater	5.00	Appear for/attend 30(b)(6) deposition of Syndicate 318 witness Steve Anderson
1/28/2021	Erin Green Comite	8.00	Draft/revise motion for class certification.
1/28/2021	Joe Guglielmo	5.20	Plan and prepare for and attend 318 depositions
1/28/2021	Joe Guglielmo	1.40	Review/analyze expert report, edit. Conf w EGC
1/28/2021	Charlie Torres	1.50	Isolate all documents tagged "Expert Bordereaux" and export has native file and forward to experts.
1/28/2021	Kelly Hogan	2.00	Review/analyze pull docs from depos from various veritext correspondence and save on citrix and correspond with team to send to expert
1/29/2021	Kelly Hogan	1.00	Review/analyze proof para edit and correspond on subpoenas
1/29/2021	Charlie Torres	3.30	Prepare plaintiff video file for upload to review platform and produce to defendants.; Combine all Expert Bordereaux spreadsheet (100) and creat two master files according to fields format.
1/29/2021	Alex Outwater	8.20	Plan and prepare for deposition of Aloha Insurance president Tad Nottage
1/29/2021	Joe Guglielmo	1.00	Review/analyze docs w expert re damages and ascertainability
1/29/2021	Erin Green Comite	8.00	Review/analyze damages and class member data for class certification.
1/29/2021	Joe Guglielmo	0.50	Communicate (other external) - conf w Moa re discovery, mediation
1/29/2021	Joe Guglielmo	0.80	Communicate (other external) - conf w UW re discovery, class cert, mediation
1/30/2021	Erin Green Comite	3.00	Draft/revise motion for class certification.
1/31/2021	Alex Outwater	0.70	Communicate (in firm) Zoom conference with Joe Guglielmo to discuss the upcoming deposition of Aloha Insurance President Tad Nottage
1/31/2021	Erin Green Comite	6.00	Draft/revise opposition to motion to deny class certification.
1/31/2021	Joe Guglielmo	1.20	Plan and prepare for w AO re Nottage deposition. Rev docs
2/1/2021	Erin Green Comite	14.00	Draft/revise opposition to motion to deny class certification.
2/1/2021	Joe Guglielmo	2.00	Review/analyze and edit expert report for class certification
2/1/2021	Michelle Conston	0.50	Communicate (co-counsel) - Meet and confer with Aloha's counsel

## Exhibit A to Declaration of Joseph P. Guglielmo

2/1/2021	Michelle Conston	9.00	Draft/revise class certification briefing and exhibits
2/1/2021	Charlie Torres	1.80	Prepare re-production for upload of overlay document to review platform.
2/1/2021	Kelly Hogan	4.00	Review/analyze put together subpoenas and put together and format letter
2/1/2021	Alex Outwater	7.10	Plan and prepare for deposition of Aloha Insurance President Tad Nottage
2/1/2021	Alex Outwater	4.00	Communicate (in firm) Telephone conference with Joe Guglielmo to discuss issues relating to Tad Nottage deposition
2/1/2021	Alex Outwater	0.70	Review/analyze draft opposition to Moa's motion to deny class certification
2/2/2021	Alex Outwater	5.50	Plan and prepare for deposition of Aloha Insurance President Tad Nottage
2/2/2021	Alex Outwater	2.00	Appear for/attend deposition of Aloha Insurance President Tad Nottage
2/2/2021	Alex Outwater	0.40	Communicate (co-counsel) Telephone conference with co-counsel Jeff Foster to discuss outcome of the Nottage Deposition
2/2/2021	Alex Outwater	0.30	Review/analyze correspondence with defense counsel regarding proposed stipulation to extend expert disclosure deadlines
2/2/2021	Kelly Hogan	3.00	Review/analyze work on editing and serving subpoenas paralegal motion and proposed order and file with court
2/2/2021	Ellen DeWan	0.50	Draft/revise final and file SAH motion to withdraw
2/2/2021	Michelle Conston	2.50	Appear for/attend deposition of Peter Nottage
2/2/2021	Michelle Conston	5.00	Draft/revise class certification briefing and exhibits
2/2/2021	Joe Guglielmo	0.80	Communicate (in firm) - conf w AO re Nottage deposition, rev docs
2/2/2021	Joe Guglielmo	2.20	Review/analyze and edit opp to motion to deny class cert, conf w EGC
2/2/2021	Erin Green Comite	14.00	Draft/revise opposition to motion to deny class certification.
2/3/2021	Erin Green Comite	14.00	Draft/revise opposition to motion to deny class certification.
2/3/2021	Toby Saviano	2.30	Draft/revise -cite-check brief; send cases to K. Hogan.
2/3/2021	Joe Guglielmo	3.30	Draft/revise opp to motion to deny class cert, conf w EGC, conf w expert re data
2/3/2021	Michelle Conston	11.00	Draft/revise class certification briefing and exhibits
2/3/2021	Charlie Torres	1.10	Convert (HPIA) produced documents (40) to searchable pdf and native spreadsheets for distribution to court for motion.
2/3/2021	Ellen DeWan	2.50	Review/analyze status of brief; assist KH with inputting attorney edits to same
2/3/2021	Kelly Hogan	7.50	Review/analyze para opp to deny class cert and prepare exhibits and supporting docs
2/3/2021	Alex Outwater	3.90	Research regarding motion to compel defendant Aloha to produce information regarding putative class members, including review of Pacific Radiation Oncology case cited by Aloha

## Exhibit A to Declaration of Joseph P. Guglielmo

2/3/2021	Alex Outwater	0.60	Review/analyze correspondence with Aloha's counsel Steve Goto regarding class discovery for anticipated discovery motion
2/3/2021	Alex Outwater	2.10	Review/analyze document production from Syndicate 1183 in Relativity database
2/3/2021	Alex Outwater	1.80	Draft/revise stipulation and order for filing of second amended complaint and related exhibits
2/4/2021	Alex Outwater	2.50	Draft/revise letter motion for expedited discovery assistance regarding Aloha's production of classwide information
2/4/2021	Toby Saviano	2.00	Review/analyze opposition to class certification brief.
2/4/2021	Kelly Hogan	15.00	Review/analyze proof and para opp to deny class cert, decl and supporting docs, set up exhibits, work with outside printer to have delivered to court and file and correspond
2/4/2021	Ellen DeWan	4.00	Plan and prepare for find vendor to arrange for courtesy copies; numerous emails to receive and send exhibits to vendor, work with KH to final
2/4/2021	Charlie Torres	3.40	Prepare Underwriter production for upload to review platform for attorney review.; Quality control of Expert spreadsheets count all lines to match master set.; Convert requested text documents to searchable pdf files.
2/4/2021	Michelle Conston	8.00	Draft/revise class certification briefing and exhibits
2/4/2021	Joe Guglielmo	4.00	Review/analyze and edit opp to motion to deny, conf w MC, AO, and EGC. Rev Expert info
2/4/2021	Erin Green Comite	16.00	Draft/revise (finalizing) opposition to motion to deny class certification.
2/5/2021	Joe Guglielmo	0.60	Review/analyze expert info for damages report, conf w MC re motion to extend time for expert reports
2/5/2021	Joe Guglielmo	0.20	Communicate (in firm) - conf w EGC and K Wood re mediation
2/5/2021	Erin Green Comite	2.00	Draft/revise (finalizing) opposition to motion to deny class certification.
2/5/2021	Michelle Conston	1.00	Communicate (other external) - Call court; delivery of courtesy copies
2/5/2021	Kelly Hogan	0.50	Review/analyze compile and correspond with printing service to ensure docs sent to court as chambers copies
2/5/2021	Alex Outwater	3.10	Draft/revise letter motion for expedited discovery assistance regarding Aloha's production of classwide information; incorporate edits from Joe Guglielmo, finalize same
2/5/2021	Alex Outwater	0.30	Draft/revise email correspondence to Magistrate Judge Mansfield's Courtroom Manager notifying the Court of discovery dispute regarding Aloha's production of classwide information



## Exhibit A to Declaration of Joseph P. Guglielmo

2/7/2021	Joe Guglielmo	0.30	Review/analyze expert info for damages
2/7/2021	Joe Guglielmo	0.30	Communicate (co-counsel) - conf w K Wood and EGC re possible mediation
2/7/2021	Erin Green Comite	0.30	Communicate (in firm) with J. Guglielmo and K. Wood regarding possible mediation.
2/8/2021	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo and K. Wood regarding case updates.
2/8/2021	Joe Guglielmo	1.20	Review/analyze docs for mediation, draft demand to Ds. Conf w EGC and K Wood
2/8/2021	Kelly Hogan	5.00	Review/analyze proof para, have served, and file subpoenas, and proof and para letter brief
2/8/2021	Alex Outwater	1.20	Draft/revise letter brief per comments from Joe Guglielmo; revise case citations
2/8/2021	Alex Outwater	0.60	Research to find additional supporting case law for Aloha letter brief
2/8/2021	Michelle Conston	7.00	Draft/revise Opposition to motion to deny class certification
2/9/2021	Michelle Conston	9.30	Draft/revise Opposition to motion to deny class certification
2/9/2021	Kelly Hogan	4.00	Review/analyze proof para and send out subpoenas for service adn e-file and finalize and e-file letter brief
2/9/2021	Alex Outwater	0.90	Draft/revise Aloha letter brief, work with paralegal on filing issues
2/9/2021	Alex Outwater	0.20	Review/analyze joinder from Aloha in Monarch's motion to deny class certification
2/9/2021	Joe Guglielmo	0.50	Communicate (in firm) - conf w AO re Aloha deposition. Conf w Ds re scheduling and mediation
2/9/2021	Joe Guglielmo	1.70	Communicate (in firm) - conf w EGC re opp to MT to deny
2/9/2021	Joe Guglielmo	1.20	Review/analyze expert report, damages edit
2/9/2021	Erin Green Comite	1.70	Communicate (in firm) with J. Guglielmo regarding opposition to Motion to Deny.
2/10/2021	Joe Guglielmo	1.80	Review/analyze info for damages report. Mediation info. Draft demand for clients
2/10/2021	Alex Outwater	1.30	Review/analyze Aloha's letter brief regarding production of classwide data and authority cited in same
2/10/2021	Alex Outwater	1.50	Research for contrary authority in response to Aloha's letter brief
2/10/2021	Alex Outwater	3.00	Review/analyze correspondence between counsel regarding Court's rejection of motion to seal records, and strategy for addressing same
2/10/2021	Kelly Hogan	4.50	Review/analyze prepare amended complaint and summons for filing and file and have summons served
2/10/2021	Michelle Conston	10.30	Draft/revise Opposition to motion to deny class certification
2/11/2021	Michelle Conston	11.30	Draft/revise Opposition to motion to deny class certification
2/11/2021	Charlie Torres	0.60	Prepare video file for overlay to review platform.

## Exhibit A to Declaration of Joseph P. Guglielmo

2/12/2021	Alex Outwater	2.00	Plan and prepare for hearing on motion to compel defendant Aloha to produce class member data
2/12/2021	Erin Green Comite	5.00	Draft/revise motion for class certification.
2/12/2021	Erin Green Comite	1.00	Review/analyze McCarron draft report.
2/12/2021	Michelle Conston	1.00	Manage data/files - Opposition to motion to deny class certification courtesy copy to court
2/12/2021	Michelle Conston	6.10	Research motion for class certification
2/15/2021	Michelle Conston	7.20	Research motion for class certification
2/15/2021	Joe Guglielmo	1.20	Review/analyze expert reports for class cert, edit report, conf w EGC
2/15/2021	Joe Guglielmo	0.80	Communicate (in firm) - conf w AO and prep for motion to compel hearing
2/15/2021	Joe Guglielmo	0.40	Communicate (other external) - conf w Ds re mediation, conf w K Wood, J Foster. Rev info for mediation, damages info
2/15/2021	Alex Outwater	6.10	Plan and prepare for hearing on motion to compel defendant Aloha to produce class member data
2/15/2021	Alex Outwater	0.80	Communicate (in firm) Telephone conference with Lloyd's team to discuss tomorrow's discovery hearing
2/15/2021	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo regarding class cert.
2/16/2021	Alex Outwater	3.00	Plan and prepare for hearing on motion to compel defendant Aloha to produce class member data
2/16/2021	Alex Outwater	0.50	Appear for/attend hearing regarding Aloha's production of classwide information
2/16/2021	Joe Guglielmo	1.50	Plan and prepare for and attend motion to compel Aloha to produce classwide data. Conf w AO
2/16/2021	Joe Guglielmo	0.50	Communicate (other external) - conf w K Wood re mediation
2/16/2021	Joe Guglielmo	1.40	Appear for/attend meet and confer re motion to file under seal, conf w MC and AO
2/16/2021	Erin Green Comite	3.00	Draft/revise Hager expert report.
2/16/2021	Michelle Conston	0.50	Appear for/attend Discovery hearing on motion to compel aloha
2/16/2021	Michelle Conston	1.00	Draft/revise Stipulation of service of complaint on Lloyd's Syndicate 510
2/16/2021	Michelle Conston	0.50	Communicate (other external) - Attorney for counsel for third party
2/16/2021	Michelle Conston	5.00	Research motion for class certification
2/17/2021	Erin Green Comite	3.00	Research for expert report.
2/17/2021	Joe Guglielmo	0.30	Communicate (other external) - conf w Ds re mediation, conf w K Wood re schedule

## Exhibit A to Declaration of Joseph P. Guglielmo

2/17/2021	Kelly Hogan	3.00	Review/analyze update subpoenas to send out nad draft letter withdrawing subpoena of certain third-party
2/17/2021	Alex Outwater	2.60	Research cases and revise class certification brief to add additional citations to relevant district court cases
2/18/2021	Kelly Hogan	2.00	Review/analyze proof and para stipulation and correspond with judge's orders email address
2/18/2021	Joe Guglielmo	0.80	Communicate (other external) - conf w K Wood re mediation, damages info
2/18/2021	Erin Green Comite	4.00	Draft/revise Hager draft expert report.
2/18/2021	Alex Outwater	0.50	Communicate (other external) Review and analyze correspondence with all counsel regarding mediation scheduling issues
2/19/2021	Alex Outwater	0.30	Communicate (other external) Telephone conference with Moa's counsel to discuss an extension of time to respond to discovery in light of pending mediation, send email confirming same
2/19/2021	Ellen DeWan	1.50	Plan and prepare for second filing under seal in light of court order re same, discuss with MC
2/19/2021	Joe Guglielmo	1.20	Draft/revise expert reports for class cert
2/19/2021	Joe Guglielmo	0.80	Communicate (other external) - conf w Ds re mediation, conf AO re docs
2/19/2021	Kelly Hogan	2.50	Review/analyze update subpoena and withdrawal letter and have served and sent out by mail and proof para and file stipulation
2/19/2021	Michelle Conston	0.20	Communicate (in firm) with Ellen DeWan regarding second filing under seal in light of court order.
2/22/2021	Joe Guglielmo	1.10	Communicate (other external) - call with Mediator re possible mediation, prep for call
2/22/2021	Erin Green Comite	4.00	Draft/revise Stipulation to Seal.
2/22/2021	Erin Green Comite	1.50	Review/analyze Plaintiff damages and correspondence with expert.
2/22/2021	Michelle Conston	1.50	Draft/revise Sealing documents
2/22/2021	Alex Outwater	0.50	Appear for/attend Telephone conference with mediator Keith Hunter
2/23/2021	Erin Green Comite	0.50	Communicate (other external) with mediator.
2/23/2021	Joe Guglielmo	1.00	Communicate (other external) - call w Mediator re case
2/23/2021	Joe Guglielmo	0.50	Communicate (in firm) - conf w AO re Moa response for discovery, proposed stay
2/23/2021	Kelly Hogan	2.50	Review/analyze adjust exhibits for filing under seal
2/23/2021	Alex Outwater	0.50	Communicate (in firm) with JG regarding Moa response for discovery and proposed stay.

## Exhibit A to Declaration of Joseph P. Guglielmo

2/24/2021	Erin Green Comite	2.00	Draft/revise McCarron draft expert report.
2/25/2021	Erin Green Comite	0.50	Review/analyze emails relating to subpoenas.
2/25/2021	Erin Green Comite	0.50	Communicate (other external) with defense counsel regarding sealing and follow-up with Michelle.
2/25/2021	Michelle Conston	1.50	Draft/revise Sealing documents
2/25/2021	Kelly Hogan	0.50	Review/analyze proof para letter re stay and correspond sending to opposing counsel and out attorneys
2/26/2021	Kelly Hogan	3.00	Review/analyze proof, compile, redact and file joint motion to seal opposition to motion to deny class cert and correspond with court
2/26/2021	Erin Green Comite	0.50	Review/analyze draft motion to seal.
2/26/2021	Erin Green Comite	2.50	Draft/revise McCarron draft expert report.
3/1/2021	Charlie Torres	2.10	Prepare Aloha production (AIS008) for upload to review platform. Convert files to relativity format.
3/1/2021	Erin Green Comite	4.00	Draft/revise McCarron expert report.
3/1/2021	Erin Green Comite	4.00	Draft/revise Hager expert report.
3/1/2021	Joe Guglielmo	0.30	Review/analyze information re mediation
3/1/2021	Joe Guglielmo	1.00	Review/analyze motion for sanctions draft, conf w AO, EGC. Rev info, conf w K Wood and J Foster
3/1/2021	Kelly Hogan	2.00	Review/analyze update, proof, and edit motion to seal and exhibits and memo of law in opp. to motion to deny class cert and refile with the court and email copies and proposed order to chambers
3/1/2021	Michelle Conston	3.50	Draft/revise Motion to seal
3/1/2021	Michelle Conston	1.00	Research motion for class certification
3/1/2021	Alex Outwater	0.40	Review/analyze - Review and analyze correspondence between counsel regarding motion to file under seal and edits to same
3/1/2021	Alex Outwater	0.50	Review/analyze - Review and analyze California Supreme Court case regarding privacy and discovery of absent class identities
3/2/2021	Alex Outwater	0.40	Review/analyze - Review and analyze letter from third-party Hull in response to subpoena for business records
3/2/2021	Kelly Hogan	0.50	Review/analyze draft and edit subpoena
3/2/2021	Michelle Conston	7.50	Research motion for class certification
3/2/2021	Joe Guglielmo	0.50	Communicate (other external) - conf w Ds re mediation, conf w K Wood, re demand

## Exhibit A to Declaration of Joseph P. Guglielmo

3/2/2021	Joe Guglielmo	0.50	Review/analyze discovery responses, draft letter to UW re discovery
3/2/2021	Joe Guglielmo	0.30	Review/analyze Aloha discovery, conf w Ds
3/2/2021	Erin Green Comite	1.00	Draft/revise Rule 11 questions.
3/3/2021	Joe Guglielmo	0.80	Review/analyze Rule 11 motion, conf w K Wood, conf w EGC
3/3/2021	Joe Guglielmo	0.60	Review/analyze discovery responses, conf w MC, prep for call with Monarch
3/3/2021	Joe Guglielmo	0.40	Communicate (other external) - conf w D Walker re mediation and settlement
3/3/2021	Erin Green Comite	1.50	Draft/revise McCarron draft expert report and correspondence to McCarron regarding same.
3/3/2021	Erin Green Comite	0.50	Communicate (in firm) with team to discuss class certification strategy.
3/3/2021	Erin Green Comite	0.50	Draft/revise Second set of Requests for Production.
3/3/2021	Michelle Conston	1.00	Communicate (in firm) - Call with JG, EC, and AO
3/3/2021	Kelly Hogan	1.50	Review/analyze proof and para RUle 26 letter and finalize and serve subpoenas
3/3/2021	Kelly Hogan	3.00	Review/analyze proof and para 2nd rfps and serve on defendants
3/3/2021	Alex Outwater	1.20	Draft/revise - Revise email to Aloha's counsel Steve Goto regarding his Rule 11 motion
3/3/2021	Alex Outwater	1.00	Draft/revise - Review and analyze Aloha's Rule 11 motion
3/3/2021	Alex Outwater	0.50	Research Legal research regarding which cut-off date applies to plaintiffs' motion for class certification
3/4/2021	Michelle Conston	2.50	Draft/revise outline for meet and confer with Monarch's counsel
3/4/2021	Michelle Conston	0.50	Communicate (in firm) - Call with JG
3/4/2021	Erin Green Comite	3.00	Communicate (in firm) with Joe Guglielmo and Michelle Conston to strategize how to respond to Rule 11 motion.
3/4/2021	Erin Green Comite	4.00	Draft/revise Hager draft expert report.
3/4/2021	Erin Green Comite	1.00	Communicate (other external) with Magistrate Judge Mansfield regarding case schedule and preparation for same.
3/4/2021	Joe Guglielmo	1.40	Communicate (other external) - status conference w Magistrate. Prep for call
3/5/2021	Joe Guglielmo	0.60	Review/analyze expert draft, edit, conf w EGC
3/5/2021	Joe Guglielmo	0.80	Review/analyze docs for discovery response for Monarch, conf w MC
3/5/2021	Joe Guglielmo	1.00	Review/analyze rev docs for response to Goto Rule 11 motion, conf w K Wood, conf w EGC
3/5/2021	Erin Green Comite	1.50	Draft/revise Hager draft expert report.
3/5/2021	Michelle Conston	1.00	Communicate (other external) - Call with opposing counsel re: Ps' responses to discovery

## Exhibit A to Declaration of Joseph P. Guglielmo

3/5/2021	Kelly Hogan	3.00	Review/analyze finalize refiling of opp to mot to deny class cert correspond with team and court clerk and e-file documents, and serve defendants
3/7/2021	Joe Guglielmo	1.30	Review/analyze discovery docs for mediation
3/8/2021	Alex Outwater	0.40	Communicate (other external) Prepare emails to all defendants individually to request status update on privilege logs
3/8/2021	Anja Rusi	3.00	Research insurance bad faith actions in Hawaii.
3/8/2021	Erin Green Comite	0.50	Communicate (in firm) with Joe Guglielmo regarding Rule 11 response.
3/8/2021	Erin Green Comite	1.00	Communicate (in firm) with Joe Guglielmo and Anja Rusi regarding legal research for Rule 11 response.
3/8/2021	Erin Green Comite	1.00	Communicate (other external) with M. McCarron and Joe Guglielmo regarding expert report.
3/8/2021	Erin Green Comite	3.00	Draft/revise draft McCarron expert report.
3/8/2021	Michelle Conston	0.50	Communicate (with client) - re interrogatory answers
3/8/2021	Joe Guglielmo	1.80	Communicate (in firm) - conf w EGC and expert re damages report, rev and edit
3/8/2021	Joe Guglielmo	1.20	Review/analyze discovery responses for Monarch, edit, conf w MC
3/9/2021	Michelle Conston	0.50	Communicate (other external) - meet and confer with Underwriters counsel
3/9/2021	Michelle Conston	0.20	Communicate (other external) - Email re third party subpoenas
3/9/2021	Anja Rusi	4.00	Research election of remedies in Hawaii State Ct
3/9/2021	Anja Rusi	4.00	Draft/revise memorandum regarding election of remedies in Hawaii State Ct
3/9/2021	Erin Green Comite	7.00	Draft/revise Hager draft report.
3/9/2021	Joe Guglielmo	1.30	Review/analyze docs for amended discovery responses, conf w MC
3/9/2021	Joe Guglielmo	1.80	Draft/revise and finalize expert report with EGC. Conf w expert
3/9/2021	Alex Outwater	0.90	Communicate (other external) Meet and confer with counsel for Underwriters regarding document production issues
3/9/2021	Alex Outwater	1.00	Review/analyze - Review documents from State court cases which appear to show the lava exclusion was a basis for denial
3/9/2021	Alex Outwater	0.80	Review/analyze - Review and analyze meet and confer correspondence with Aloha's counsel Steve Goto regarding his client's Rule 11 motion
3/10/2021	Joe Guglielmo	1.40	Review/analyze rev info for Ps responses and objections, prep for Monarch meet and confer, conf w MC
3/10/2021	Erin Green Comite	9.00	Draft/revise - finalizing Hager and McCarron expert reports.
3/10/2021	Charlie Torres	1.80	Prepare two defendant productions for upload to review platform for attorney review.

## Exhibit A to Declaration of Joseph P. Guglielmo

3/10/2021	Charlie Torres	2.10	Setting up plaintiff production by bates stamping pdf files and converting to relativity format for distribution to council.
3/10/2021	Anja Rusi	5.00	Review/analyze: Current statutory state law and court decisions regarding insurance bad faith actions in Hawaii.
3/10/2021	Michelle Conston	0.80	Plan and prepare for document production
3/10/2021	Mario Tlatenchi	0.20	Communicate (in firm) with Jonathan Swerdloff regarding redaction and confidentiality and discuss correspondence regarding the same.
3/11/2021	Erin Green Comite	1.00	Draft/revise draft initial disclosures.
3/11/2021	Erin Green Comite	2.00	Draft/revise amended initial disclosures.
3/11/2021	Erin Green Comite	3.00	Research for damages for mediation brief.
3/11/2021	Michelle Conston	0.50	Draft/revise letter to Monarch counsel
3/11/2021	Michelle Conston	1.00	Review/analyze defendants' document productions for deficiencies
3/11/2021	Joe Guglielmo	1.10	Draft/revise and review final expert reports, conf w EGC
3/11/2021	Joe Guglielmo	0.30	Communicate (other external) - conf w UW re settlement
3/11/2021	Joe Guglielmo	1.00	Draft/revise and amend responses to Monarch discovery. Conf w MC
3/12/2021	Joe Guglielmo	2.40	Review/analyze docs for AIS Rule 11 motion, legal research on claims and election or remedies. Conf w EGC and AR
3/12/2021	Michelle Conston	0.50	Communicate (other external) - meet and confer with Aloha counsel
3/12/2021	Erin Green Comite	1.00	Communicate (in firm) with Anja Rusi and Joe Guglielmo regarding legal research for Rule 11.
3/12/2021	Erin Green Comite	1.00	Communicate (other external) with defense counsel as meet and confer for Rule 11 motion.
3/12/2021	Erin Green Comite	6.00	Research for damages for mediation brief.
3/12/2021	Kelly Hogan	2.00	Review/analyze proof and para discovery letter and correspond
3/12/2021	Kelly Hogan	3.00	Review/analyze proof and para 3d amended initial disclosures and correspond and prepare and file COS on docket
3/12/2021	Alex Outwater	0.40	Communicate (other external) Meet and confer with counsel for Aloha regarding Rule 11 motion
3/12/2021	Anja Rusi	1.00	Communicate (in firm) with EGC and JG regarding legal research for Rule 11.
3/15/2021	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo and K. Wood regarding mediation damages.
3/15/2021	Alex Outwater	6.50	Draft/revise - Continue drafting responses to Moa's Requests for Admission
3/15/2021	Michelle Conston	0.50	Communicate (other external) - Call with counsel for third party subpoena recipient

## Exhibit A to Declaration of Joseph P. Guglielmo

3/15/2021	Michelle Conston	0.50	Communicate (other external) - Call with counsel for third party subpoena recipient
3/15/2021	Michelle Conston	0.50	Draft/revise notes of call with S. Goto
3/15/2021	Michelle Conston	1.00	Draft/revise Plaintiffs' discovery responses
3/15/2021	Michelle Conston	0.50	Review/analyze documents from state case
3/15/2021	Kelly Hogan	0.50	Review/analyze draft correspond and file certificate of service
3/15/2021	Erin Green Comite	8.00	Research for damages for mediation statement.
3/15/2021	Joe Guglielmo	0.50	Review/analyze docs for UW production, conf w Ds re ESI status
3/15/2021	Joe Guglielmo	0.30	Communicate (other external) - settlement discussions. Conf w K Wood and EGC re mediation, damages
3/15/2021	Joe Guglielmo	1.30	Communicate (in firm) - conf w AIS re Rule 11 motion. Prep for call
3/15/2021	Joe Guglielmo	0.40	Review/analyze docs for Aloha Rule 11 motion, conf w co counsel re production
3/16/2021	Joe Guglielmo	1.20	Review/analyze and edit mediation statement. Conf w EGC
3/16/2021	Joe Guglielmo	0.40	Communicate (other external) - settlement conf w UW counsel
3/16/2021	Joe Guglielmo	0.50	Draft/revise discovery responses for Moa. Conf w AO
3/16/2021	Erin Green Comite	7.00	Draft/revise mediation statement.
3/16/2021	Michelle Conston	5.00	Draft/revise Plaintiffs' discovery responses
3/16/2021	Alex Outwater	6.00	Draft/revise - Continue drafting objections and responses to Moa's Requests for Admission
3/16/2021	Alex Outwater	0.20	Communicate (other external) Review correspondence from Moa's counsel regarding status of his client's privilege logs
3/16/2021	Alex Outwater	0.70	Review/analyze - Review draft responses to Moa's interrogatories to the Aquilina plaintiffs
3/17/2021	Alex Outwater	6.50	Draft/revise - Prepare draft objections and responses to Moa's Requests for Production of Documents
3/17/2021	Kelly Hogan	0.25	Review/analyze prepare format and include verification page in document and correspond
3/17/2021	Kelly Hogan	4.25	Review/analyze proof para and correspond and make cert of service for responses to discovery
3/17/2021	Michelle Conston	2.00	Draft/revise Plaintiffs' discovery responses
3/17/2021	Erin Green Comite	8.00	Draft/revise mediation statement.
3/17/2021	Joe Guglielmo	1.20	Review/analyze and edit discovery responses for Moa and Monarch
3/17/2021	Joe Guglielmo	1.10	Draft/revise mediation statement, conf w EGC
3/17/2021	Joe Guglielmo	0.40	Communicate (other external) - settlement conf w UW counsel



## Exhibit A to Declaration of Joseph P. Guglielmo

3/18/2021	Joe Guglielmo	0.40	Communicate (other external) - conf w Mediator, conf w EGC, K Wood
3/18/2021	Joe Guglielmo	0.80	Appear for/attend m/c w Ds re dispositive motions
3/18/2021	Joe Guglielmo	1.20	Communicate (in firm) - conf w EGC re edits to mediation statement
3/18/2021	Erin Green Comite	8.00	Draft/revise mediation statement.
3/18/2021	Michelle Conston	3.00	Draft/revise Plaintiffs' discovery responses
3/18/2021	Kelly Hogan	3.50	Review/analyze proof and para responses to discovery and prepare COSs for filing the next morning
3/18/2021	Alex Outwater	1.50	Draft/revise - Revise and finalize objections and responses to Moa's requests for admission
3/18/2021	Alex Outwater	1.50	Draft/revise - Revise and finalize objections and responses to Moa's request for production of documents
3/18/2021	Alex Outwater	3.70	Draft/revise - Review and analyze expert reports in preparation for working on expert citations in motion for class certification
3/19/2021	Alex Outwater	0.20	Communicate (in firm) with JG, EGC and MEC regarding discovery responses.
3/19/2021	Michelle Conston	3.00	Draft/revise Plaintiffs' discovery responses
3/19/2021	Michelle Conston	2.00	Draft/revise declaration; organize exhibits
3/19/2021	Kelly Hogan	1.50	Review/analyze finalize responses to discovery request and file COSs
3/19/2021	Kelly Hogan	5.50	Review/analyze proof and para mediation statement compile exhibits and correspond and send to mediator
3/19/2021	Erin Green Comite	8.00	Draft/revise mediation statement.
3/19/2021	Joe Guglielmo	1.30	Review/analyze and edit discovery responses, finalize with EGC, MC and AO
3/19/2021	Joe Guglielmo	0.30	Communicate (other external) - conf w K Wood re mediation
3/19/2021	Joe Guglielmo	0.70	Draft/revise mediation statement, conf w EGC
3/22/2021	Joe Guglielmo	1.10	Review/analyze and edit class cert motion, conf w EGC
3/22/2021	Joe Guglielmo	0.50	Communicate (other external) - conf w discovery issues, motion to compel re UW and Monarch docs. Conf w AO
3/22/2021	Charlie Torres	1.40	Quality control of defendant production and plaintiff production for upload to review platform.
3/22/2021	Erin Green Comite	8.00	Draft/revise class certification brief.
3/22/2021	Michelle Conston	9.60	Draft/revise class certification and summary judgment motions
3/22/2021	Alex Outwater	0.20	Communicate (in firm) with JG regarding discovery issues.
3/23/2021	Michelle Conston	8.00	Draft/revise class certification and summary judgment motions
3/23/2021	Erin Green Comite	8.00	Draft/revise class certification brief.

## Exhibit A to Declaration of Joseph P. Guglielmo

3/23/2021	Joe Guglielmo	2.00	Review/analyze and edit class cert motion, research, rev docs
3/24/2021	Joe Guglielmo	2.50	Communicate (other external) - conf w S Cole re summary judgment drafts, concise statement, draft statement
3/24/2021	Joe Guglielmo	2.00	Review/analyze and edit class cert memo, conf w EGC
3/24/2021	Erin Green Comite	8.00	Draft/revise class certification brief.
3/24/2021	Michelle Conston	6.00	Draft/revise class certification and summary judgment motions
3/24/2021	Kelly Hogan	3.00	Review/analyze proof and para class cert brief
3/24/2021	Alex Outwater	1.80	Draft/revise - Prepare motion for class certification and class definition
3/25/2021	Kelly Hogan	6.00	Review/analyze proof and para class cert and compile exhibits and correspond
3/25/2021	Alex Outwater	1.00	Draft/revise - Prepare motion for summary judgment against Underwriters (motion only)
3/25/2021	Alex Outwater	1.00	Draft/revise - Prepare motion for summary judgment against Monarch (motion only)
3/25/2021	Alex Outwater	1.00	Draft/revise - Prepare motion for summary judgment against Moa (motion only)
3/25/2021	Alex Outwater	1.00	Draft/revise - Prepare motion for summary judgment against Aloha (motion only)
3/25/2021	Michelle Conston	8.00	Draft/revise class certification and summary judgment motions
3/25/2021	Ellen DeWan	1.00	Review/analyze class cert brief after KH edits
3/25/2021	Erin Green Comite	8.00	Draft/revise class certification brief.
3/25/2021	Toby Saviano	8.50	Draft/revise motion for summary judgment papers.
3/25/2021	Charlie Torres	1.60	Manually create plaintiff production from PDF file forwarded by attorney (MEC) to Electronic stored information format.
3/25/2021	Joe Guglielmo	2.00	Appear for/attend - mediation w K Hunter. Conf w J Foster, K Wood
3/25/2021	Joe Guglielmo	4.30	Draft/revise draft summary judgment motions, consise statements, conf w MC and EGC. Conf w K Wood
3/25/2021	Joe Guglielmo	2.40	Review/analyze and edit class cert motion, conf w EGC
3/26/2021	Joe Guglielmo	5.60	Draft/revise and finalize motions for summary judgment, conf w MC, AO, and EGC
3/26/2021	Joe Guglielmo	1.80	Review/analyze and finalize class cert motion, conf w EGC
3/26/2021	Joe Guglielmo	1.30	Communicate (other external) - conf w K Wood and J Foster re mediation, conf w K Hunter, conf w D Walker re mediation
3/26/2021	Toby Saviano	5.00	Draft/revise motion for summary judgment papers.
3/26/2021	Erin Green Comite	12.00	Draft/revise motions for summary judgment and concise statements of facts.
3/26/2021	Toby Saviano	1.00	Draft/revise opposiyion to motions to dismiss.
3/26/2021	Michelle Conston	14.50	Draft/revise class certification and summary judgment motions

## Exhibit A to Declaration of Joseph P. Guglielmo

3/26/2021	Kelly Hogan	6.00	Review/analyze edit class cert brief and compile exhibits and hold the pen on ongoing changes to doc and exhibits and file along with motion to seal and proposed order serving on judge and all parties
3/26/2021	Kelly Hogan	8.00	Review/analyze proof para and edit and make consistent 4 SMJ motions and correspond with DC and TS who helped para briefs, compile exhibits for each and correspond with attorneys to ensure accuracy, and file along with concise statements
3/26/2021	Alex Outwater	0.30	Communicate (in firm) with JG, EGC and MEC regarding Motion for Summary Judgment.
3/27/2021	Joe Guglielmo	1.60	Review/analyze motion for sanctions, conf w co counsel re 1927 motion, research
3/29/2021	Michelle Conston	0.80	Manage data/files Courtesy copies
3/29/2021	Michelle Conston	4.50	Review/analyze summary judgment papers
3/29/2021	Kelly Hogan	2.00	Review/analyze pull docs and correspond with team in office to have printed and mailed to court courtesy copies and look up local rules as well as send labels, directions, and documents, and cover letter
3/29/2021	Erin Green Comite	1.00	Review/analyze summary judgment motions.
3/29/2021	Erin Green Comite	0.50	Draft/revise insert for settlement statement.
3/29/2021	Joe Guglielmo	1.20	Communicate (other external) - conf w K Hunter re mediation, motion for sanctions
3/29/2021	Joe Guglielmo	0.30	Communicate (other external) - conf w UW re discovery status
3/29/2021	Joe Guglielmo	1.40	Communicate (in firm) - conf w MC and EGC re service of hard copy documents for Motions for SJ and Class Cert.
3/30/2021	Erin Green Comite	0.20	Communicate (in firm) with J. Guglielmo regarding mediation statement for Magistrate.
3/30/2021	Joe Guglielmo	1.50	Communicate (other external) - conf w mediator re status, conf w K Wood re allegations for state/federal release
3/30/2021	Joe Guglielmo	0.80	Review/analyze and edit mediation statement for Magistrate, conf w EGC
3/30/2021	Michelle Conston	4.00	Draft/revise mediation statement
3/30/2021	Michelle Conston	3.30	Draft/revise Outline summary judgment papers
3/31/2021	Michelle Conston	2.50	Draft/revise mediation statement
3/31/2021	Kelly Hogan	3.00	Review/analyze proof para second settlement conference statement and correspond and send to judge and check local rules
3/31/2021	Joe Guglielmo	0.60	Review/analyze and edit mediation statement for Magistrate, conf w EGC
3/31/2021	Erin Green Comite	0.20	Communicate (in firm) discussions with J. Guglielmo regarding mediation statement for Magistrate.

## Exhibit A to Declaration of Joseph P. Guglielmo

4/1/2021	Joe Guglielmo	0.50	Communicate (other external) - Lloyds – conf w mediator re status, conf w J Foster, K Wood re allegations for state/federal release
4/1/2021	Alex Outwater	0.60	Review/analyze - Review and analyze Moa's objections and responses to plaintiffs' second request for production of documents
4/2/2021	Joe Guglielmo	0.30	Communicate (other external) - conf w D Walker re mediation
4/5/2021	Joe Guglielmo	0.60	Communicate (other external) - conf w mediator re status, conf w K Wood re allegations for state/federal release
4/6/2021	Joe Guglielmo	2.20	Review/analyze Golden complaint and mark up for release. Conf w K Wood and J Foster re state and federal cases
4/6/2021	Alex Outwater	0.20	Review/analyze - Review and analyze email correspondence from Monarch's counsel regarding third-party subpoena to ARM
4/7/2021	Alex Outwater	0.20	Communicate (other external) Review and analyze correspondence from Underwriters' counsel regarding an extension of time to respond to discovery
4/7/2021	Joe Guglielmo	1.20	Review/analyze Golden complaint, conf w D Walker re release. Conf w K Wood re cases
4/7/2021	Joe Guglielmo	1.40	Appear for/attend settlement conference w Judge Mansfield, prep for status call
4/12/2021	Michelle Conston	8.50	Plan and prepare for Deposition of Rob Porter
4/13/2021	Joe Guglielmo	0.20	Communicate (in firm) - conf. w AO re ARM production
4/13/2021	Charlie Torres	1.80	Prepare defendant production for upload to review platform.;
4/13/2021	Alex Outwater	0.20	Communicate (in firm) with JG regarding ARM production.
4/14/2021	Joe Guglielmo	1.60	Review/analyze Ds response to release proposal, conf. w D Walker
4/15/2021	Joe Guglielmo	1.40	Review/analyze Ds response to mediation release proposal, conf w K Wood, conf w mediator
4/16/2021	Joe Guglielmo	0.40	Communicate (other external) - conf w mediator, K Wood re response
4/18/2021	Joe Guglielmo	0.30	Communicate (co-counsel) - conf. w co-counsel re settlement
4/20/2021	Alex Outwater	0.30	Communicate (in firm) with JG regarding ARM production.
4/20/2021	Joe Guglielmo	1.70	Review/analyze ARM docs, conf w AO
4/21/2021	Joe Guglielmo	0.90	Review/analyze rev ARM docs, conf w AO and conf re deficiency letter for ARM, UW productions
4/21/2021	Alex Outwater	0.20	Communicate (in firm) with JG regarding deficiency letter for ARM, UW productions.
4/22/2021	Joe Guglielmo	0.80	Communicate (other external) - conf w K Wood re release for federal claims, draft for term sheet

## Exhibit A to Declaration of Joseph P. Guglielmo

4/22/2021	Erin Green Comite	0.80	Communicate (in firm) with Joe Guglielmo regarding Lloyds release.
4/23/2021	Erin Green Comite	0.70	Communicate (in firm) with Lloyds team regarding motions for class certification.
4/23/2021	Joe Guglielmo	0.50	Communicate (other external) - conf w D Walker re term sheet, settlement
4/23/2021	Joe Guglielmo	0.50	Communicate (in firm) - conf w MC, AO and EGC re motions to deny, briefing and outline
4/23/2021	Michelle Conston	0.50	Communicate (in firm) - Call re: opposition to class cert motions
4/23/2021	Alex Outwater	0.50	Communicate (in firm) with JG, EGC and MEC regarding motions to deny, briefing and outline.
4/26/2021	Alex Outwater	0.50	Communicate (in firm) with JG and MEC regarding responses to Motion to Deny.
4/26/2021	Michelle Conston	8.00	Draft/revise Opposition to class certification papers
4/26/2021	Mario Tlatenchi	0.60	Manage data/files e-mails to JPG re incoming Golden_UW production from the "Golden state court litigation" and gaps in production.
4/26/2021	Joe Guglielmo	0.40	Communicate (other external) - conf w K Wood re settlement
4/26/2021	Joe Guglielmo	0.50	Communicate (in firm) - conf w MC and AO re responses to motion to deny
4/26/2021	Charlie Torres	1.90	Run quality control on three productions and follow up with attorney the issue's.; Intake of defendant two productions for upload to review platform.
4/27/2021	Joe Guglielmo	1.50	Communicate (other external) - conf w Ds re settlement, edit term sheet. Conf w EGC
4/27/2021	Erin Green Comite	3.00	Draft/revise term sheet.
4/27/2021	Erin Green Comite	1.00	Draft/revise draft stipulation to move the hearing date.
4/27/2021	Michelle Conston	1.50	research good faith settlement provision
4/28/2021	Kelly Hogan	0.50	Review/analyze proof and para letter and send to opposing counsel re production
4/28/2021	Michelle Conston	8.00	Draft/revise Opposition to class certification papers
4/28/2021	Michelle Conston	1.50	Research good faith settlement provision
4/28/2021	Erin Green Comite	0.50	Communicate (in firm) with team regarding class certification briefing.
4/28/2021	Joe Guglielmo	2.00	Review/analyze and edit term sheet, conf w K Wood. Conf w EGC
4/29/2021	Alex Outwater	0.30	Communicate (in firm) with JG, EGC and MEC regarding class cert. memo and reply briefs.
4/29/2021	Joe Guglielmo	1.20	Review/analyze and edit term sheet, conf w K Wood
4/29/2021	Joe Guglielmo	1.30	Review/analyze class cert memo, reply briefs. Conf w AO, MC and EGC
4/29/2021	Erin Green Comite	0.50	Communicate (in firm) with Joe Guglielmo regarding Lloyd's Release.
4/29/2021	Erin Green Comite	2.00	Draft/revise opposition to Monarch's Motion to Decertify Class.
4/29/2021	Michelle Conston	8.00	Draft/revise Opposition to class certification papers

## Exhibit A to Declaration of Joseph P. Guglielmo

4/30/2021	Michelle Conston	0.50	Communicate (co-counsel) - call with co-counsel
4/30/2021	Michelle Conston	8.00	Draft/revise Opposition to class certification papers
4/30/2021	Joe Guglielmo	1.20	Draft/revise term sheet, conf w K Wood
4/30/2021	Erin Green Comite	5.50	Draft/revise opposition to Monarch motion to decertify class.
5/3/2021	Erin Green Comite	5.50	Draft/revise opposition to Monarch's motion to decertify class.
5/4/2021	Joe Guglielmo	2.00	Review/analyze docs for opp to Monarch motion to deny. Conf w MC and EGC
5/4/2021	Erin Green Comite	1.50	Research regarding motion to strike and admissibility of evidence.
5/4/2021	Erin Green Comite	1.50	Draft/revise opposition to Monarch's motion to decertify class.
5/5/2021	Michelle Conston	1.00	Draft/revise Opposition to class certification papers
5/5/2021	Erin Green Comite	8.00	Draft/revise opposition to Monarch's motion to decertify class.
5/5/2021	Joe Guglielmo	2.00	Draft/revise opposition to motion to deny class cert – UW. Conf w EGC re Monarch opposition
5/6/2021	Alex Outwater	0.20	Communicate (in firm) with JG and EGC regarding opposition to Monarch Motion to Deny.
5/6/2021	Joe Guglielmo	2.00	Review/analyze and edit opposition to Monarch motion to deny. Conf w EGC an AO
5/6/2021	Joe Guglielmo	0.40	Draft/revise term sheet, conf w K Wood
5/6/2021	Ellen DeWan	0.50	Plan and prepare for begin to gather documents for courtesy copy preparation
5/6/2021	Erin Green Comite	4.50	Draft/revise opposition to Monarch's motion to decertify class.
5/6/2021	Michelle Conston	0.80	Draft/revise letter to court re: exhibits
5/7/2021	Erin Green Comite	8.00	Draft/revise opposition to Monarch's motion to decertify class.
5/7/2021	Joe Guglielmo	1.50	Communicate (other external) - conf w K Hunter and Ds re mediation. Rev draft edits to term sheet, edit, conf w K Wood and J Foster
5/7/2021	Joe Guglielmo	1.40	Review/analyze and edit opposition to UW motion to deny
5/10/2021	Erin Green Comite	8.00	Draft/revise opposition to Monarch's motion to decertify class.
5/10/2021	Alex Outwater	4.90	Legal research regarding proper standard for analyzing UDAP claim in a class certification motion
5/10/2021	Alex Outwater	0.70	Prepare email summarizing research regarding class certification of plaintiffs' UDAP claim
5/10/2021	Joe Guglielmo	1.50	Review/analyze rev and edit opps to UW and Monarch motions to deny class certification. Conf w MC, AO, EGC. Rev documents produced in related case for exhibits
5/10/2021	Michelle Conston	3.00	Draft/revise Opposition to class certification papers

## Exhibit A to Declaration of Joseph P. Guglielmo

5/10/2021	Toby Saviano	5.50	Draft/revise lead plaintiff motion papers.
5/10/2021	Kelly Hogan	1.50	Review/analyze Proof and para motion for extension of time and to file omnibus brief and file
5/11/2021	Michelle Conston	6.00	Draft/revise Opposition to class certification papers
5/11/2021	Joe Guglielmo	1.30	Review/analyze and edit opps to UW and Monarch motions to deny class certification. Conf w EGC
5/11/2021	Toby Saviano	5.30	Draft/revise opposition papers to class decertification motion and joinder.
5/11/2021	Erin Green Comite	8.00	Draft/revise opposition to Monarch motion to decertify class.
5/11/2021	Kelly Hogan	7.00	Review/analyze proof and para omnibus opp to motion to deny class cert
5/12/2021	Erin Green Comite	8.00	Draft/revise opposition to Monarch motion to decertify class.
5/12/2021	Toby Saviano	3.00	Draft/revise opposition papers to class decertification motion and joinder.
5/12/2021	Joe Guglielmo	1.10	Review/analyze and edit opps to UW and Monarch motions to deny class certification. Conf w EGC
5/12/2021	Alex Outwater	1.40	Review/analyze - Compare omnibus opposition brief to Monarch and Underwriters' Motions to Deny Class Certification to confirm all arguments have been addressed
5/12/2021	Alex Outwater	0.50	Revise introduction section of omnibus opposition brief to Monarch and Underwriters' Motions to Deny Class Certification
5/12/2021	Michelle Conston	8.00	Draft/revise Opposition to class certification papers
5/13/2021	Michelle Conston	8.00	Draft/revise Opposition to class certification papers
5/13/2021	Joe Guglielmo	0.60	Communicate (other external) - conf w K Wood and edit term sheet. Conf w EGC
5/13/2021	Joe Guglielmo	1.10	Review/analyze rev and edit opps to UW and Monarch motions to deny class certification. Conf w EGC
5/13/2021	Toby Saviano	7.40	Draft/revise-opposition to class decertification papers.
5/13/2021	Erin Green Comite	8.00	Draft/revise opposition to Monarch motion to decertify class.
5/13/2021	Ellen DeWan	0.50	Plan and prepare for gather documents for courtesy copy to court, emails with TS re same
5/14/2021	Alex Outwater	0.70	Communicate (in firm) with JG regarding replies for class cert., rev opps.
5/14/2021	Ellen DeWan	2.50	Communicate (other external) with copy center to prepare courtesy copies, review court requirements and prepare memo with detail re same, numerous emails to complete job.
5/14/2021	Joe Guglielmo	0.70	Communicate (in firm) - conf w AO re replies for class cert, rev opps.
5/14/2021	Joe Guglielmo	0.50	Communicate (other external) - call w Mediator re edits to term sheet. Conf w K Wood

## Exhibit A to Declaration of Joseph P. Guglielmo

5/14/2021	Michelle Conston	7.00	Draft/revise reply to class certification papers
5/17/2021	Michelle Conston	8.00	Draft/revise Opposition to class certification papers
5/17/2021	Ellen DeWan	0.50	Communicate (other external) emails to follow up on copy job for courtesy copy to court
5/17/2021	Joe Guglielmo	1.20	rev and edit class cert responses to motions to deny. Conf w EGC and MC
5/17/2021	Joe Guglielmo	0.50	Communicate (other external) - conf w K Wood re client settlement, term sheet. Conf w UW counsel
5/17/2021	Erin Green Comite	10.00	Draft/revise reply brief in support of class certification.
5/17/2021	Toby Saviano	0.80	Other-arrange for confidential opposition papers to be sent to court.
5/17/2021	Kelly Hogan	0.50	Review/analyze compile docs and file under seal with courts under seal email address
5/18/2021	Erin Green Comite	10.00	Draft/revise reply brief in support of class certification.
5/18/2021	Joe Guglielmo	0.60	Communicate (other external) - conf w Ds re edits to term sheet. Conf w K Wood, J Foster
5/18/2021	Michelle Conston	8.00	Draft/revise reply to class certification papers
5/19/2021	Kelly Hogan	4.00	Review/analyze proof and para reply ISO class cert
5/19/2021	Michelle Conston	8.00	Draft/revise reply to class certification papers
5/19/2021	Erin Green Comite	10.00	Draft/revise reply brief in support of class certification.
5/19/2021	Joe Guglielmo	0.60	Communicate (other external) - conf w Ds re settlement
5/19/2021	Joe Guglielmo	0.70	Communicate (in firm) - conf w EGC re edits to class cert responses
5/20/2021	Joe Guglielmo	1.40	Draft/revise reply to class cert, legal research, conf w EGC
5/20/2021	Joe Guglielmo	0.50	Communicate (with client) - conf w clients re settlement offer, review release
5/20/2021	Erin Green Comite	10.00	Draft/revise reply brief in support of class certification.
5/20/2021	Ellen DeWan	0.50	Communicate (other external) further follow up to get confirmation of delivery and receipts for work
5/20/2021	Michelle Conston	3.00	Draft/revise reply to class certification papers
5/20/2021	Kelly Hogan	7.00	Review/analyze proof and para reply iso class cert and supporting documents, tables, and exhibits, correspond and file
5/21/2021	Joe Guglielmo	0.60	Communicate (other external) - conf w K Wood, clients re term sheet and settlement
5/24/2021	Erin Green Comite	0.50	Communicate (in firm) with Joe Guglielmo regarding Lloyd's settlement strategy.
5/24/2021	Joe Guglielmo	0.60	Communicate (other external) - conf w K Wood, clients re term sheet and settlement



## Exhibit A to Declaration of Joseph P. Guglielmo

5/24/2021	Kelly Hogan	1.00	Review/analyze proof para and file with judge's stipulation email a stipulation to continue expert deadlines
5/25/2021	Joe Guglielmo	1.30	Communicate (co-counsel) - conf w co counsel and clients re term sheet, settlement
5/25/2021	Joe Guglielmo	0.30	Communicate (in firm) - conf w EGC re extension of expert reports
5/25/2021	Erin Green Comite	4.00	Review/analyze settlement issues.
5/25/2021	Erin Green Comite	1.50	Communicate (with client) regarding settlement.
5/26/2021	Joe Guglielmo	0.80	Communicate (other external) - conf w Ds re edits to term sheet. Conf w K Wood
5/26/2021	Joe Guglielmo	0.60	Communicate (with client) - Conf w clients re approval of settlement. Conf w K Wood
5/26/2021	Joe Guglielmo	0.50	Communicate (co-counsel) - conf w possible local counsel
5/26/2021	Michelle Conston	1.00	Research Franchisee discovery
5/27/2021	Joe Guglielmo	1.00	Communicate (other external) - conf w Magistrate re settlement, conf w K Wood. Rev stipulation for court
6/1/2021	Michelle Conston	6.00	Draft/revise Preliminary approval motion/settlement agreement
6/1/2021	Joe Guglielmo	0.20	Review/analyze final term sheet, conf w Ds
6/2/2021	Joe Guglielmo	0.20	Communicate (other external) - conf w Ds re term sheet and deadline for submission
6/2/2021	Joe Guglielmo	0.20	Communicate (other external) - conf w K Wood re local counsel
6/2/2021	Erin Green Comite	0.60	Communicate (in firm) with M. Conston and J. Guglielmo regarding settlement.
6/2/2021	Michelle Conston	6.00	Draft/revise Preliminary approval motion/settlement agreement
6/2/2021	Michelle Conston	0.50	Communicate (in firm) - Call with JG
6/3/2021	Michelle Conston	2.50	Draft/revise Preliminary approval motion/settlement agreement
6/3/2021	Kelly Hogan	1.00	Review/analyze proof and para and circulate letters to settlement notice providers
6/3/2021	Erin Green Comite	0.50	Communicate (in firm) via correspondence to M. McCarron regarding notice.
6/3/2021	Erin Green Comite	1.00	Draft/revise motion to extend time on rebuttal reports.
6/4/2021	Michelle Conston	5.00	Draft/revise Preliminary approval motion/settlement agreement
6/7/2021	Michelle Conston	6.00	Draft/revise Preliminary approval motion/settlement agreement
6/8/2021	Michelle Conston	6.00	Draft/revise Preliminary approval motion/settlement agreement
6/8/2021	Kelly Hogan	1.00	Review/analyze proof para and submit stipulation re expert disc.
6/8/2021	Erin Green Comite	0.50	Other - searching for local counsel.
6/8/2021	Joe Guglielmo	0.80	Draft/revise settlement agreement, conf w MC
6/8/2021	Joe Guglielmo	0.50	Communicate (co-counsel) - conf w potential local counsel
6/8/2021	Mario Tlatenchi	0.50	Communicate (in firm) with JPG re ILS invoices for Relativity and steps for disposition of data in light of settlement talks.

## Exhibit A to Declaration of Joseph P. Guglielmo

6/9/2021	Joe Guglielmo	0.70	Draft/revise settlement agreement and related notice documents
6/9/2021	Erin Green Comite	1.00	Draft/revise settlement documents.
6/9/2021	Michelle Conston	6.00	Draft/revise Preliminary approval motion/settlement agreement
6/10/2021	Erin Green Comite	4.00	Draft/revise Lloyd's settlement documents.
6/10/2021	Joe Guglielmo	0.40	Communicate (other external) - conf w K Wood re settlement and local counsel status
6/11/2021	Erin Green Comite	6.00	Draft/revise Lloyd's settlement documents.
6/14/2021	Erin Green Comite	1.00	Communicate (in firm) with Joe Guglielmo regarding settlement issues.
6/14/2021	Joe Guglielmo	1.10	Review/analyze and edit settlement agreement, and related notice documents
6/14/2021	Michelle Conston	3.00	Draft/revise Preliminary approval motion/settlement agreement
6/15/2021	Erin Green Comite	1.00	Communicate (other external) via correspondence to potential local counsel.
6/17/2021	Joe Guglielmo	0.40	Communicate (other external) - conf w tax consultant re claims administration
6/17/2021	Erin Green Comite	0.50	Communicate (other external) with tax advisor regarding tax treatment of Lloyd's settlement.
6/17/2021	Erin Green Comite	2.00	Draft/revise retainer for liaison counsel.
6/18/2021	Erin Green Comite	1.50	Draft/revise retainer for liaison counsel.
6/18/2021	Erin Green Comite	0.50	Review/analyze property addresses.
6/21/2021	Michelle Conston	6.00	Draft/revise Preliminary approval motion/settlement agreement
6/21/2021	Erin Green Comite	0.50	Draft/revise motion to withdraw and substitute counsel.
6/21/2021	Joe Guglielmo	0.30	Communicate (other external) - conf w Ds re notice administration proposals
6/21/2021	Joe Guglielmo	0.40	Communicate (in firm) - conf w EGC re substitution of counsel motion. Conf w K Wood
6/21/2021	Kelly Hogan	1.00	Review/analyze proof and para and correspond re withdrawal of counsel
6/22/2021	Michelle Conston	7.00	Draft/revise Preliminary approval motion/settlement agreement
6/23/2021	Michelle Conston	7.00	Draft/revise Preliminary approval motion/settlement agreement
6/24/2021	Michelle Conston	4.50	Draft/revise Preliminary approval motion/settlement agreement
6/25/2021	Michelle Conston	4.50	Draft/revise Preliminary approval motion/settlement agreement
6/28/2021	Michelle Conston	4.50	Draft/revise Preliminary approval motion/settlement agreement
6/28/2021	Joe Guglielmo	0.20	Communicate (other external) - conf w Ds re settlement status
6/29/2021	Michelle Conston	4.50	Draft/revise Preliminary approval motion/settlement agreement
6/30/2021	Joe Guglielmo	0.50	Review/analyze Ds edits to settlement agreement, conf w EGC
6/30/2021	Erin Green Comite	1.00	Review/analyze Defendants' edits to settlement agreement and call with Joe Guglielmo regarding edits to settlement agreement.

## Exhibit A to Declaration of Joseph P. Guglielmo

6/30/2021	Michelle Conston	0.50	Communicate (co-counsel) - call with co-counsel
6/30/2021	Michelle Conston	1.00	Communicate (other external) - call with opposing counsel
6/30/2021	Michelle Conston	4.50	Draft/revise Preliminary approval motion/settlement agreement
7/1/2021	Alex Outwater	0.40	Review and analyze correspondence with opposing counsel regarding settlement documents
7/1/2021	Alex Outwater	1.00	Review and analyze latest version of settlement agreement and supporting documents
7/1/2021	Erin Green Comite	0.50	Communicate (other external) with defense counsel regarding settlement.
7/1/2021	Erin Green Comite	2.00	Draft/revise settlement agreement documents.
7/1/2021	Erin Green Comite	3.00	Draft/revise preliminary approval brief and declaration.
7/1/2021	Joe Guglielmo	0.80	Draft/revise settlement agreement and notice documents. Conf w Ds. Conf w EGC
7/2/2021	Michelle Conston	7.00	Draft/revise Preliminary approval motion/settlement agreement
7/2/2021	Michelle Conston	0.50	Draft/revise Letter to opposing counsel
7/2/2021	Alex Outwater	0.50	Review and analyze correspondence with broker's counsel regarding timing of settlement payments
7/6/2021	Michelle Conston	5.50	Draft/revise Preliminary approval motion/settlement agreement
7/6/2021	Joe Guglielmo	0.50	Communicate (in firm) - conf w EGC and D Walker re notice costs, releasee info
7/6/2021	Joe Guglielmo	0.40	Communicate (other external) - conf w RG2 re claims administration, declaration
7/7/2021	Erin Green Comite	0.30	Communicate (in firm) with Joe Guglielmo reviewing case status regarding Lloyds.
7/7/2021	Charlie Torres	0.40	Give attorney all stats related to plaintiff productions.
7/7/2021	Michelle Conston	5.50	Draft/revise Preliminary approval motion/settlement agreement
7/7/2021	Joe Guglielmo	0.30	Communicate (in firm) with EGC reviewing case updates and status.
7/8/2021	Michelle Conston	4.50	Draft/revise Preliminary approval motion/settlement agreement
7/8/2021	Joe Guglielmo	0.80	Review/analyze rev settlement edits, finalize agreement and exhibits. Conf w MC and EGC. Conf w Ds
7/8/2021	Joe Guglielmo	0.40	Communicate (other external) - conf w D Walker and RG2 re publication notice
7/8/2021	Erin Green Comite	3.00	Draft/revise motion for preliminary approval and declaration.
7/9/2021	Joe Guglielmo	0.60	Communicate (other external) - conf w B Wickersham re claims admin declaration
7/9/2021	Joe Guglielmo	0.50	Communicate (co-counsel) - conf w co counsel re final drafts of settlement agreement and notice. Conf w K Wood
7/9/2021	Erin Green Comite	1.00	Draft/revise motion for preliminary approval and declaration.
7/9/2021	Michelle Conston	7.00	Draft/revise Preliminary approval motion/settlement agreement

## Exhibit A to Declaration of Joseph P. Guglielmo

7/10/2021	Joe Guglielmo	0.30	Review/analyze edits to settlement notice
7/12/2021	Joe Guglielmo	0.60	Review/analyze final edits and finalize settlement for filing
7/12/2021	Joe Guglielmo	0.70	Communicate (other external) - conf w M Shannon and Court re extension of deadline
7/12/2021	Kelly Hogan	9.00	Review/analyze proof para and edit motion and memo and supporting docs and correspond
7/12/2021	Erin Green Comite	0.50	Communicate (in firm) with Joe Guglielmo regarding motion for preliminary approval.
7/12/2021	Erin Green Comite	0.50	Communicate (in firm) with Michelle Conston regarding preliminary adjudication.
7/12/2021	Ellen DeWan	5.00	Review/analyze cite check preliminary approval memo.
7/12/2021	Michelle Conston	6.10	Draft/revise Preliminary approval motion/settlement agreement
7/13/2021	Michelle Conston	5.00	Draft/revise Preliminary approval motion/settlement agreement/motion for extension of time
7/13/2021	Kelly Hogan	5.00	Review/analyze proof para and finalize and file settlement motion and supporting docs
7/13/2021	Joe Guglielmo	1.00	Review/analyze and finalize settlement, conf w Ds, conf w MC

## **EXHIBIT B**

CLASS COUNSEL’S HOURLY RATES AND HAWAII HOURLY RATES

Name	Bar Admission/ Role	Total Hours	Hourly Rate	Lodestar at Hourly Rates	Adjusted Hawaii Hourly Rate <sup>1</sup>	Adjusted Hawaii Lodestar
<b>Partners</b>						
Joseph Guglielmo	1996 (25)	856.20	\$900	\$770,580.00	\$575	\$492,315.00
Erin Green Comite	2002 (19)	1,732.10	\$825	\$1,428,982.50	\$500	\$866,050.00
<b>Associates</b>						
Alex Outwater	2008 (13)	519.40	\$725	\$376,565.00	\$400	\$207,760.00
Anja Rusi	2016 (5)	17.00	\$575	\$9,775.00	\$350	\$5,950.00
J. Alex Vargas	2004 (17)	25.10	\$625	\$15,687.50	\$400	\$10,040.00
Justin Batten	2018 (2)	477.30	\$450	\$214,785.00	\$300	\$143,190.00
Michelle Conston	2013 (8)	2,012.50	\$575	\$1,157,187.50	\$375	\$754,687.50
Sean Russell	2016 (5)	37.60	\$400	\$15,040.00	\$350	\$13,160.00

<sup>1</sup> The Adjusted Hawaii Hourly Rate has been calculated by using rates approved in *Martin v. Marriott Int’l, Inc.*, No. 1:18-cv-00494, ECF No. 169-8 (D. Haw. Aug. 2, 2021), *Smith v. Bank of Hawaii*, No. 1:16-cv-00513-JMS-WRP, ECF No. 217-1 (D. Haw. Apr. 10, 2020), and *Sheehey v. Bhanot*, No. 1:13-cv-00663, ECF No. 390-1 (D. Haw. Mar. 30, 2018).

<b>Name</b>	<b>Bar Admission/ Role</b>	<b>Total Hours</b>	<b>Hourly Rate</b>	<b>Lodestar at Hourly Rates</b>	<b>Adjusted Hawaii Hourly Rate<sup>1</sup></b>	<b>Adjusted Hawaii Lodestar</b>
<b>Support Staff</b>						
Irina Chilaia	Paralegal	14.00	\$305	\$4,270.00	\$170	\$2,380.00
Ellen Dewan	Paralegal	29.50	\$325	\$9,587.50	\$170	\$5,015.00
Kaitlin Steinberger	Paralegal	208.00	\$325	\$67,600.00	\$170	\$35,360.00
Kelly Hogan	Paralegal	222.50	\$395	\$87,887.50	\$140	\$31,150.00
Toby Saviano	Paralegal	40.80	\$395	\$16,116.00	\$140	\$5,712.00
Charlie Torres	Litigation Support	97.10	\$300	\$29,130.00	\$140	\$13,594.00
Mario Tlatenchi	Litigation Support	12.40	\$300	\$3,720.00	\$140	\$1,736.00
<b>TOTAL</b>		<b>6,301.50</b>		<b>\$4,206,913.50</b>		<b>\$2,588,099.50</b>