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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE INTUIT DATA LITIGATION

Master Docket No. 15-CV-1778-EJD-SVK

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**DECLARATION OF JULIAN HAMMOND
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND REQUEST
FOR SERVICE AWARDS**

Honorable Edward J. Davila

1 I, Julian Hammond, declare as follows:

2 1. I am a member in good standing of the Bar of the State of California and the founding
3 shareholder of the law firm HammondLaw, P.C.¹ I am counsel for Mr. David Stock, one of the named
4 plaintiffs and class representatives in this action and, while not counsel for the putative Class, I have
5 followed the course of this litigation carefully and have communicated frequently with the lead
6 counsel, Mr. Roger Heller, at Lief Cabraser Heimann & Bernstein, as well as with other lead/co-lead
7 counsel concerning the litigation and ultimate settlement. I have personal knowledge of the facts set
8 forth in this declaration and could and would testify competently to them if called upon to do so.

9 2. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Class
10 Action Settlement. I believe the Settlement is fair and appropriate, and is in the best interest of the
11 Settlement Class.

12 **ATTORNEY EXPERIENCE AND QUALIFICATIONS**

13 3. I graduated from the University of New South Wales with a Bachelors of Commerce in
14 1995, from the University of Technology in Sydney with a Bachelors of Law *summa cum laude* in
15 1999, and from New York University School of Law with a Masters of Law in 2001. I have over 15
16 years of litigation experience and have been appointed lead or co-lead class counsel in dozens of cases
17 including many consumer protection class actions. Attached hereto as **Exhibit 1** is a true and correct
18 copy of my résumé detailing my relevant experience.

19 4. HammondLaw has been certified as Class Counsel or Co-Class Counsel in more than
20 30 class actions in both state and federal courts in California and Washington state, including a case on
21 behalf of nearly 4 million consumers in *Siciliano, et al. v. Apple, Inc.*, Case No. 1-13-cv-257676
22 (Santa Clara Super. Cty. Ct. Nov. 2, 2018) (order approving \$16.5 million class action settlement for
23 consumers in a California Automatic Renewal Law, Cal. Bus. & Prof. Code §§ 17600 case, and fees
24 requested).² My firm also served on the steering committee in a multi-district data breach litigation in
25

26 ¹ I am also admitted to practice in the states of New York and Washington, and admitted to practice as
a Barrister-at-Law in both the New South Wales and Victorian Supreme Courts of Australia.

27 ² The settlement was finally approved on November 2, 2018, over one objection of an objector
28 represented by serial-objector counsel. The objector has filed an application to intervene, which has

1 *In re Ashley Madison Customer Data Security Breach Litig.*, MDL No. 2669 (E.D. Miss. November
2 11, 2017) (ECF. 383, order granting final approval of \$11.2 settlement).

3 5. The class and representative actions I have litigated throughout the past 10 years have led
4 to favorable class action settlements that have recouped millions of dollars on behalf of plaintiffs.

5 6. My two associates, Polina Pecherskaya and Ari Cherniak, played an active role in
6 representing Mr. Stock in this case and in performing tasks assigned by the lead counsel firms.

7 7. Ms. Pecherskaya is a ninth-year associate. She received her B.A. in history *cum laude*
8 from the Macaulay Honors College at the City University of New York in 2005, and her J.D. from the
9 Benjamin N. Cardozo School of law in 2009. While in law school, Ms. Pecherskaya was an intern for
10 the Honorable Sandra L. Townes of the Southern District of New York, and was a volunteer for
11 Sanctuary for Families advocating for abused partners and/or spouses seeking orders of protection
12 and/or uncontested divorces. After graduation, she clerked for the Honorable Anita H. Dymant of the
13 Appellate Division of the Los Angeles Superior Court from 2009 to 2012. During her time at
14 HammondLaw, her practice has focused on wage and hour and consumer class actions. Ms.
15 Pecherskaya is admitted to practice law in California and New York.

16 8. Mr. Cherniak is a seventh-year associate. He received his B.S. in Philosophy *cum laude*
17 from Towson University in 2007, and his J.D. from Tulane Law School in 2011. While in law school,
18 Mr. Cherniak earned a citation for his extensive pro bono work in the Felony Trial Unit of Baltimore
19 City Office of the Public Defender. Since 2012, Mr. Cherniak's practice has focused on wage and hour
20 and consumer class actions. Mr. Cherniak is admitted to practice law in California and Maryland.

21 **WORK PERFORMED**

22 9. Prior to filing the complaint in *Stock v. Intuit*, Case No. 5:15-cv-02287 in the Northern
23 District of California in Case No. 5:15-cv-02287, my firm and I carefully investigated the facts
24 surrounding the fraudulent filings through Intuit's website, including investigating the magnitude of
25 the fraud that had occurred and the measures Intuit allegedly had taken to protect against such fraud,
26

27 _____
28 been heard on November 30, 2018 and denied.

1 as well as any knowledge Intuit reportedly had regarding weaknesses in its system. My firm and I also
2 carefully investigated the facts specifically related to the fraudulent tax return filed using Mr. Stock's
3 social security number, including analyzing the documents provided by Mr. Stock in connection with
4 the fraudulent filing.

5 10. After filing the complaint in *Stock v. Intuit*, I became aware that there were several other
6 actions filed in federal courts (two in the Northern District of California and one in the Northern
7 District of Illinois) alleging violations on the same exact facts as in *Stock*, and the parties agreed for
8 the *Stock* case to be with the others before this Court, under a consolidated case title, *In re Intuit Data*
9 *Litigation* (N.D. Cal. Case No. 15-cv-1778-EJD).

10 11. After the cases were consolidated, lead counsel and I agreed that my firm would continue
11 to represent Mr. Stock and monitor the litigation, and would perform work on the case, as assigned by
12 lead counsel.

13 12. Throughout the case, I monitored the litigation and reviewed the filings with the court. I
14 communicated from time to time with the lead counsel in order to discuss the progress of the case and
15 the tasks that our firm was asked to perform.

16 13. Ms. Pecherskaya and Mr. Cherniak performed work related to the initial investigation,
17 drafting and filing of the complaint in *Stock, et al.* and Ms. Pecherskaya performed the bulk of my
18 firm's work on this case after the *Stock* case was consolidated into this litigation. Specifically, Ms.
19 Pecherskaya communicated with Mr. Stock throughout the litigation to keep him updated on the
20 progress of the litigation, obtained necessary documents from Mr. Stock for the use in the consolidated
21 case, participated in conversations and interviews with Mr. Stock and lead counsel, reviewed filings
22 pertinent to the tasks assigned to her, drafted pleadings or portions of pleadings, conducted legal
23 research, and drafted discovery requests.

24 **TIME EXPENDED AND HOURLY RATES**

25 14. HammondLaw has expended 162.6 hours on this case from the time *Stock, et al. v. Intuit*,
26 was filed and through the December 1, 2018, for a lodestar of \$96,106, using the firm's 2015/2016
27 billing rates.

1 15. The time expended is both fair and reasonable. The time expended reflects time spent on
2 tasks described in paragraphs 12-13, above. Attached as **Exhibit 2** is a report identifying my firm's
3 professional staff that billed time to this case, the number of hours for which compensation is sought,
4 the task code for the hours expended, and the billing rates.

5 16. My firm made all reasonable efforts to efficiently manage, staff and assign those tasks
6 among the lower and higher-level attorneys and to avoid duplication of efforts.

7 17. The applied hourly rates are commensurate with the rates of practitioners with similar
8 experience within the California legal market. My firm's hourly rates have been previously approved
9 by both California federal and state courts. *See, e.g. Moss v. USF Reddaway*, Case No. 5:15-cv-1541
10 (C.D. Cal. July 25, 2018) (ECF. 124, approving attorneys' fees request based on HammondLaw's
11 2015, 2016 and 2017 rates); *Davis v. Birchbox*, No. 3:15-cv-00498 (S.D. Cal. Oct. 17, 2016) (ECF No.
12 57, approving HammondLaw's 2016 hourly rates); *Maldonado v. Heavy Weight Transport, Inc.*, No.
13 2:16-cv-08838 (C.D. Cal. December 11, 2017) (ECF. 40, approving attorneys' fees request based on
14 HammondLaw's 2015/2016 hourly rate); *Gagner v. Southern Wine*, No. 3:10-cv-04405 (N.D. Cal.
15 Dec. 11, 2012) (ECF. 63, approving fees award based on HammondLaw's (and co-counsel's) 2012
16 hourly rates); *Hillman v. Kaplan Higher Education, LLC*, No. 34-2017-00208078 (Sacramento Cty.
17 Super. Ct. Dec. 7, 2017) (approving fee request based on 2015 and 2016 hourly rates); *Gargir v.*
18 *Seaworld*, No. 37-2015-00008175 (San Diego Cty. Super. Ct. Oct. 31, 2016) (approving
19 HammondLaw's 2016 hourly rates); *Araiza v. Scotts*, No. BC570350 (L.A. Cty. Super. Ct. Sept. 19,
20 2016) (approving fee request based on 2015 and 2016 hourly rates), *Goldman v. LifeLock*, No. 1-15-
21 CV-276235 (Santa Clara Cty. Super. Ct. Jan. 7, 2016) (approving award based on HammondLaw's
22 2015 rates) as well as other federal and state courts.

23 **OUT OF POCKET COSTS ARE REASONABLE**

24 18. As of December 1, 2018, my firm has incurred \$645.56 in out-of-pocket litigation
25 Costs. A report accurately summarizing these costs, by expense category, is attached as **Exhibit 3**.
26 These costs include court-filing and process-serving fees, and travel expenses. This amount of costs is
27 modest and reflects efficient litigation on the part of my firm in this case.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States that the foregoing is true and correct. Executed on December 10, 2018, in Baltimore, Maryland.

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5 Julian Hammond
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EXHIBIT 1

JULIAN A. HAMMOND

1829 Reisterstown Rd., Suite 410, Baltimore, MD 21208
310-601-6766 • 310-295-2385(Fax)
jhammond@hammondlawpc.com

BAR ADMISSIONS

State of New South Wales, Australia 2000
State of New York 2002
State of California 2009
State of Washington 2017

AREAS OF PRACTICE

Wage & Hour Class Actions
Consumer Class Actions
Complex Commercial Litigation
Civil Rights Litigation
Pharmaceutical Product Liability/Consumer Fraud Class Actions

EDUCATION

Masters of Law (International Legal Studies), New York University School of Law, August 2001
Bachelors of Law (J.D. equivalent), University of Technology, Sydney (summa cum laude; Law Student Editorial Board), November 1999
Bachelors of Commerce (Accounting/Marketing), University of New South Wales, 1995

PROFESSIONAL SUMMARY

HammondLaw, P.C., Baltimore, Maryland 2010 – Present
FOUNDING SHAREHOLDER

Boutique Class Action (Wage and Hour, and Consumer Class Action) Litigation Firm

Activities: Setup and maintain Baltimore office, select and source cases (sourced numerous wage & hour and consumer law class actions), negotiate co-counsel agreements (negotiated co-counsel agreements with Goldstein, Borgen, Dardarian & Ho, Ackermann & Tilajef, Berman DeValerio, Keller Rohrback LLP), and run all aspects of litigation.

Case Highlights:

Wage and Hour Cases

- ***Gagner v. Southern Wine & Spirits of America, Inc.***, Case No. 3:10-cv-10-04405 JSW (N.D. Cal. December 11, 2012) (certifying HammondLaw as co-class counsel for \$3.5 million settlement reached on behalf of approximately 870 sales representatives);
- ***Downs, et al. v. US Foods, Inc. dba US Foodservice***, Case No. 3:10-cv-02163 EMC (N.D. Cal. September 12, 2012) (certifying HammondLaw as co-class counsel for \$3 million settlement reached on behalf of approximately 950 truck drivers);
- ***Moy, et al. v. Young's Market Co., Inc.***, Case No. 30-2011-00467109- CU-OE-CXC (Cal. Sup. Ct. Orange Cty. November 8, 2013) (certifying HammondLaw as co-class counsel for \$2.3 million settlement on behalf of approximately 575 sales representatives);

- **Garza, et al. v. Regal Wine Company, Inc. & Regal III, LLC**, Case No. RG12657199 (Cal. Sup. Ct. Alameda Cty. February 21, 2014) (certifying HammondLaw as class counsel for \$1.7 million settlement on behalf of approximately 317 employees);
- **Lange v. Ricoh Americas Corporation**, Case No. RG136812710 (Cal. Sup. Ct. Alameda Cty. August 5, 2016) (certifying HammondLaw as co-class counsel for \$1,887,060 settlement on behalf of approximately 550 sales representatives);
- **Mayton et al v. Konica Minolta Business Solutions USA, Inc.**, Case No. RG12657116 (Cal. Sup. Ct. Alameda Cty. June 19, 2015) (certifying HammondLaw as co-class counsel for \$1,225,000 settlement on behalf for approximately 620 outside sales representatives);
- **Cooper et al. v. Savage Services Corporation, Inc.**, Case No. BC578990 (Cal. Sup. Ct. L.A. Cty. October 19, 2015) (certifying HammondLaw and A&T as co-class counsel for \$295,000 settlement on behalf of approximately 115 truck drivers);
- **Gallardo et al. v. Canon Solutions America, Inc.**, Case No. CIVDSS1500375 (Cal. Sup. Ct. San Bernardino Cty. August 5, 2015) (certifying HammondLaw and A&T as co-class counsel for \$750,000 settlement on behalf for approximately 320 outside sales representatives);
- **Glover v. 20/20 Companies, Inc.**, Case No. RG14748879 (Cal. Sup. Ct. Alameda Cty. August 3, 2015) (approving Private Attorney General Act Settlement for \$475,000 on behalf of approximately 273 independent contractors);
- **Albanez v. Premium Retail Services Inc.**, Case No. RG1577982 (Cal. Sup. Ct. Alameda Cty. January 29, 2016) (approving Private Attorney General Act Settlement for \$275,000 on behalf of approximately 38 employees);
- **Garcia et al v. Sysco Los Angeles, et al.**, Case No. BC560274 (Cal. Sup. Ct. L.A. Cty. November 12, 2015) (certifying HammondLaw and A&T as co-class counsel for a \$325,000 settlement on behalf of approximately 500 truck drivers);
- **Harris v. Toyota Logistics**, Case No. C 15-00217 (Cal. Sup. Ct. Contra Costa Cty. February 9, 2016) (certifying HammondLaw and A&T as co-class counsel for \$550,000 settlement reached on behalf of approximately truck 125 drivers);
- **Alcazar v. US Foods, Inc. dba US Foodservice**, Case No. BC567664 (Cal. Sup. Ct. L.A. Cty. March 18, 2016) (certifying HammondLaw and A&T as co-class counsel for a \$475,000 settlement on behalf of approximately 634 truck drivers);
- **O'Beirne et al. v. Copier Source, Inc. dba Image Source**, Case No. 30-2015-00801066-CU-OE-CXC (Cal. Sup. Ct. Orange Cty. September 8, 2016) (certifying HammondLaw and A&T as co-class counsel for \$393,300 settlement of Labor Code §2802 putative class action on behalf of approximately 132 outside sales representatives);
- **Garcia et al. v. Zoom Imaging Solutions, Inc.**, Case No. SCV0035770 (Cal. Sup. Ct. Placer Cty. September 8, 2016) (certifying HammondLaw and A&T as co-class counsel for \$750,000 settlement of Labor Code § 510, 512, 1194 and 2802 putative class action on behalf of approximately 160 sales representatives and service technicians);
- **Mead v. Pan-Pacific Petroleum Company, Inc.**, Case No. BC555887 (Cal. Sup. Ct. L.A. Cty. August 30, 2016) (certifying HammondLaw and A&T as co-class counsel for \$450,000 settlement of Labor Code §§ 1194, 226, and 201-203 putative class action on behalf of approximately 172 truck drivers);
- **Dixon v. Hearst Television, Inc.**, Case No. 15CV000127 (Cal. Sup. Ct. Monterey Cty. September 15, 2016) (certifying HammondLaw as class counsel for a

\$432,000 settlement of Labor Code § 2802 putative class action on behalf of approximately 55 outside sales representatives);

- ***Araiza et al. v. The Scotts Company, L.L.C.***, Case No. BC570350 (Cal. Sup. Ct. L.A. Cty. September 19, 2016) (certifying HammondLaw and A&T as co-class counsel for \$925,000 settlement of Labor Code §§ 226, 510, 512 and 2802 putative class action on behalf of approximately 570 merchandisers; Labor Code 226(a) class action on behalf of approximately 120 other salaried employees);
- ***Cruz v. Blackbelt Enterprises, Inc.***, Case No. 39-2015-00327914-CU-OE-STK (Cal. Sup. Ct. San Joaquin Cty. September 22, 2016) (certifying HammondLaw and A&T as co-class counsel for \$250,000 settlement of Labor Code §§ 1194, 226, and 201-203 putative class action on behalf of approximately 79 truck drivers);
- ***Sansinena v. Gazelle Transport Inc.***, Case No. S1500-CV- No 283400 (Cal. Sup. Ct. Kern Cty. December 8, 2016) (certifying HammondLaw and A&T as co-class counsel for \$264,966 settlement of Labor Code §§ 1194, 226, and 201-203 putative class action on behalf of approximately 314 truck drivers);
- ***Martinez v. Estes West dba G.I. Trucking, Inc.***, Case. BC587052 (Cal. Sup. Ct. L.A. Cty., April 4, 2017) (certifying HammondLaw and A&T as co-class counsel for \$425,000 Labor Code §§ 1194, 226, and 201-203 putative class action on behalf of approximately 156 truck drivers);
- ***Keyes v. Vitek, Inc.***, Case No. 2016-00189609 (Cal. Sup. Ct. Sacramento Cty. February 17, 2017) (approving \$102,000 settlement of Labor Code § 2698 *et seq.* representative action for violation of Labor Code § 226.8 on behalf of 90 truck drivers);
- ***McMakin v. Dominos***, Case No. 16-2-20655-7 (Wash. Sup. Ct. Kings Cty. June 2, 2017) (approving \$160,000 settlement of Washington Minimum Wage Act §§ 49.12 and 49.46 *et seq.* putative class action on behalf of approximately 65 truck drivers);
- ***Eilerman v. McLane Company Inc.***, Case No. 3:16-cv-05303-BHS (W.D. WA-Tacoma May 17, 2017) (certifying HammondLaw as co-class counsel with A&T for \$775,000 settlement of Washington Minimum Wage Act §§ 49.12 and 49.46 *et seq.* claims on behalf of approximately 250 truck drivers);
- ***Keyes v. Valley Farm Transport, Inc.***, Case No. FCS046361 (Cal. Sup. Ct. Solano Cty. May 23, 2017) (certifying HammondLaw and A&T as co-class counsel for \$497,000 settlement of Labor Code § 226, 1194, 512 and 2698 *et seq.* claims on behalf of approximately 316 truck drivers);
- ***Russell v. Young's Commercial Transfer, Inc.***, Case No. PCU265656 (Cal. Sup. Ct. Tulare Cty. June 19, 2017) (certifying HammondLaw and A&T as co-class counsel for \$561,304 settlement of Labor Code §§ 1194, 226, 226.2, and 201-203 putative class action on behalf of approximately 962 truck drivers);
- ***Rios v. SoCal Office Technologies***, Case No. CIVDS1703071 (Cal. Sup. Ct. San Bernardino Cty. September, 6 2017) (certifying HammondLaw and A&T as co-class counsel for \$495,000 settlement of Labor Code §2802 putative class action on behalf of approximately 180 outside sales representatives);
- ***Bender et al. v. Mr. Copy, Inc.***, Case No. 30-2015-00824068-CU-OE-CXC (Cal. Sup. Ct. Orange Cty. October 13, 2017) (certifying HammondLaw and A&T as co-class counsel for \$695,000 settlement of Labor Code §2802 putative class action on behalf of approximately 250 outside sales representatives);
- ***Hillman v. Kaplan***, Case No. 34-2017-00208078 (Cal. Sup. Ct. Sacramento Cty. December 7, 2017) (certifying HammondLaw as class counsel for \$1,500,000 settlement

of Labor Code §§ 1194, 226, 226.7, 201-203 and 2802 putative class action on behalf of approximately 500 instructors);

- ***Maldonado v. Heavy Weight Transport, Inc.***, Case No. 2:16-cv-08838 (C.D. Cal. December 11, 2017) (certifying HammondLaw and A&T as co-class counsel for \$340,000 settlement of Labor Code §§ 1194, 226, 226.2, 226.7, 226, 201-203, and 2699 putative class action on behalf of approximately 160 truck drivers); and
- ***Beckman v. YMCA of Greater Long***, Case No. BC655840 (Cal. Sup. Ct. Los Angeles Cty. June 26, 2018) (approving Private Attorney General Act Settlement for \$92,500 on behalf of approximately 101 employees).

Consumer Cases

- ***Kruger v. Kiwi Crate, Inc.*** Case No. 1-13-cv-254550 (Cal. Sup. Ct. Santa Clara Cty. July 2, 2015) (certifying HammondLaw as class counsel in \$108,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims on behalf of 5,400 California subscribers to Kiwi Crate's subscriptions);
- ***Goldman v. LifeLock, Inc.*** Case No. 1-15-cv-276235 (Cal. Sup. Ct. Santa Clara Cty. February 5, 2016) (certifying HammondLaw and Berman DeValerio as co-class counsel in \$2,500,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims on behalf of 300,000 California subscribers to Lifelock's identity protection programs);
- ***Gargir v. SeaWorld Inc.***, Case No. 37-2015-00008175-CU-MC-CTL (Cal. Sup. Ct. San Diego Cty. October 21, 2016) (certifying HammondLaw and Berman DeValerio as co-class counsel in \$500,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims class action on behalf of 88,000 subscribers to SeaWorld's annual park passes);
- ***Davis v. Birchbox, Inc.***, Case No. 3:15-cv-00498-BEN-BGS (S.D. Cal. October 14, 2016) (certifying HammondLaw and Berman DeValerio as co-class counsel in \$1,572,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims on behalf of 149,000 subscribers to Birchbox's memberships);
- ***In re Ashley Madison Customer Data Security Breach Litigation***, Case No. 4:15-cv-02669 JAR (MDL No. 2669) (E.D. Mis.) (HammondLaw appointed to the executive committee in \$11.2 million settlement on behalf of 39 million subscribers to ashleymadison.com whose information was compromised in the Ashley Madison data breach).

Ackermann & Tilajef, Los Angeles, California
ASSOCIATE/COUNSEL

April 2008 – January 2010

Boutique Employment Litigation Firm

Representative Cases & Activities: Interviewed clients; prepared declarations; and responded to discovery requests; attended depositions; prepared and drafted Complaints, Class Certifications Motions, Stipulation of Settlements, and Preliminary Approval and Final Approval Motions; attended mediations; and mentored and trained junior litigators.

Deacons Solicitors, Melbourne, Australia
ASSOCIATE

November 2005- September 2007

National Full-Service Law Firm

Representative Cases & Activities: Drafted answers, interviewed company and expert witnesses; researched and prepared legal memorandum on admissibility of expert opinion evidence on

foreign law, researched and gained expertise in FDA and European regulatory filings for new drugs, prepared extensive fact chronologies, managed extensive electronic discovery. Represented GlaxoSmithKline in one of Australia's largest commercial cases.

Second and Third Floor Wentworth Chambers, Sydney, Australia March 2003- present
BARRISTER

Prestigious Floor of Commercial Trial and Appellate Litigators – International Litigation

Representative Cases & Activities: First chaired 4 cases and second chaired more than 10 cases to judgment in bench trials; argued and prepared for argument various motions, researched and prepared extensive Memorandum of Points and Authorities, prepared declarations and affidavits, developed litigation strategy; advised institutional clients.

LAW SCHOOL ACTIVITIES

University of Technology, Sydney, Australia 2003 Academic Year
LAW LECTURER

Hon. Justice James, **Supreme Court of New South Wales and Court of Criminal Appeal, NewSouth Wales, Australia** January 2000 -August 2000
CLERK

Highest Court in New South Wales (jurisdiction in common law claims over \$750,000, criminal trials carrying a lifetime sentence, and appeals from verdict and/or sentence)

Researched, reviewed transcripts, observed court proceedings, and assisted in drafting judgments in a three-week \$1 million breach of contract trial, a two-week professional legal malpractice trial, and a two week defamation trial; and researched and assisted in preparing judgments in several criminal appeal.

EXHIBIT 2

| <i>In re Intuit Data Litigation</i> | | | |
|---|--------------|-----------|---------------------|
| Summary of HammondLaw's Hours and Fees Through December 1, 2018 | | | |
| Timekeeper | Hours | Rate | Lodestar |
| Hammond, J. | 113.8 | \$ 625.00 | \$ 71,125.00 |
| Pecherskaya, P. | 39.2 | \$ 495.00 | \$ 19,404.00 |
| Cherniak, A. | 9.6 | \$ 495.00 | \$ 4,752.00 |
| Total | 162.6 | | \$ 95,281.00 |

In re Intuit Litigation

Summary of HammondLaw P.C.'s Hours and Fees by Task Through December 1, 2018

| | Hammond, J. | | Pecherskaya, P. | | Cherniak, A. | |
|-----------------------------|--------------|---------------------|-----------------|---------------------|--------------|--------------------|
| | Hours | Fees @ \$625/hr | Hours | Fees @495/hr | Hours | Fees @495/hr |
| Factual Investigation | 8.1 | \$ 5,062.50 | 0.4 | \$ 198.00 | | \$ - |
| Legal Research | 17.5 | \$ 10,937.50 | 4.5 | \$ 2,227.50 | | \$ - |
| Complaints | 7.2 | \$ 4,500.00 | 12.5 | \$ 6,187.50 | 3 | \$ 1,485.00 |
| Class Certification | | \$ - | | \$ - | | \$ - |
| Other Briefs and Pleadings | 30.2 | \$ 18,875.00 | 12.6 | \$ 6,237.00 | 6.5 | \$ 3,217.50 |
| Depositions | | \$ - | | \$ - | | \$ - |
| Document Review | | \$ - | | \$ - | | \$ - |
| Other Discovery | 3.6 | \$ 2,250.00 | 4 | \$ 1,980.00 | | \$ - |
| Court Appearances | | \$ - | | \$ - | | \$ - |
| Experts | | \$ - | | \$ - | | \$ - |
| Mediation and Settlement | 3.4 | \$ 2,125.00 | | \$ - | | \$ - |
| Case Strategy | 38.2 | \$ 23,875.00 | 0.6 | \$ 297.00 | 0.1 | \$ 49.50 |
| Class Member Communications | 5.6 | \$ 3,500.00 | 4.6 | \$ 2,277.00 | | \$ - |
| PEC Duties/Meetings | | \$ - | | \$ - | | \$ - |
| Trial/Trial Prep | | \$ - | | \$ - | | \$ - |
| Appeals | | \$ - | | \$ - | | \$ - |
| Total Lodestar | 113.8 | \$ 71,125.00 | 39.2 | \$ 19,404.00 | 9.6 | \$ 4,752.00 |

EXHIBIT 3

| <i>In re Intuit Litigation</i> - HammondLaw Costs (through December 1, 2018) | | |
|---|-----------|---------------|
| Filing fees and other court costs | \$ | 437.35 |
| Travel costs | \$ | 208.21 |
| Total | \$ | 645.56 |