

Tollini v. CGI Federal Inc., et al. – Roman Shkodnik

Detailed Time and Task Summary

Tasks Performed	Atty Hours Est.	Date range
<u>1. Pre-Filing and Investigation Tasks –</u> <ul style="list-style-type: none"> • Complaint research and research case law and other cases, and research Defendant CGI Federal Inc. and Defendant CGI Technologies and Solutions Inc. and its operations and prior litigations. • Confer with client and review documents with client, including personnel file request and production – send records request and confer with Client and Defendant CGI Federal Inc. and Defendant CGI Technologies and Solutions Inc. regarding personnel file; • Set up file and documents, including atty-client agreement, responsibilities of a class rep. and wage statements and personnel file documents. • Research California Secretary of State filings for Defendant CGI Federal Inc. and Defendant CGI Technologies and Solutions Inc. • Conduct factual and legal research into the merits of Plaintiff’s claims; • Researching similar wage class actions; • Conduct multiple conferences discussing the facts and allegations with Plaintiff, addressing conduct of litigation, time frame for events and initial actions to commence litigation. 	14	February 2018 – April 2018
<u>2. Filing the Complaint and Drafting and Sending the LWDA Letter Notice</u> <ul style="list-style-type: none"> • Conduct further research regarding Defendant CGI Federal Inc. and Defendant CGI Technologies and Solutions Inc. and policies and practices and confer with client and draft detailed file notes; • Draft Class Action Complaint and allegations. • Draft LWDA Letter and correspondence to LWDA and Defendant CGI Federal Inc. and Defendant CGI Technologies and Solutions Inc. re: PAGA Notice and claims and facts and theories and grounds for recovering civil penalties. • Confer and correspond with client regarding Complaint and review and approval of factual allegations and attend to filing. 	20	April 2018
<u>3. First Amended Complaint and Adding PAGA Claim</u> <ul style="list-style-type: none"> • Attend to finalizing and filing FAC adding PAGA Claim and service. 	14	July 2018

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<p>4. <u>Initial conferences and correspondence with Defendants’ counsel, Initial scheduling conference and case initiation requirements Review case initiation documents and conformed copies, Dismissal of Defendant CGI Technologies and Solutions Inc. and review initial Case Management Conference order and draft notice of CMC.</u></p> <ul style="list-style-type: none"> • Confer and correspond with process server regarding service on Defendant CGI Federal Inc. and Defendant CGI Technologies and Solutions Inc. and status and documents to provide. • Conduct multiple conferences with Client and exchange e-mails regarding ongoing experiences as a current employee of Defendant CGI Federal Inc. and Defendant CGI Technologies and Solutions Inc. and evidencing claims. • Continue compiling case documents from Plaintiff and case research regarding the applicable authorities and claims and Defendant’s policies and operations. • Conduct teleconferences and exchange correspondence regarding claims and Defendant CGI Federal Inc. and Defendant CGI Technologies and Solutions Inc. and its operations and the case and claims. • Confer with defense counsel regarding notice and acknowledgement • Draft multiple correspondences to Defense counsel regarding case and conference and appearance and discovery. • Meet and confer regarding dismissal of Defendant CGI Technologies and Solutions Inc. • Prepare and file stipulation regarding dismissal Defendant CGI Technologies and Solutions Inc. • Meet and confer for Initial scheduling conference. • Prepare joint case management conference statement. • Conduct further investigation into the claims, and conferences with client regarding same and documents supporting allegations. 	25	April 2018 – February 2019
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<p>5. Potential ADR Discussions and initial informal discovery requests</p> <ul style="list-style-type: none"> • Confer with defense counsel and exchange e-mails regarding decision to proceed with mediation and status of discovery and how to approach in light of agreement. • Draft and serve formal first set of written discovery requests. • Prepare Plaintiff for his deposition and participate in Plaintiff's deposition. • Meet and confer with Defendant CGI Federal Inc.'s counsel regarding subpoenas issued to Plaintiff's former and current employers. • Draft and serve initial informal discovery requests and confer and correspond with Defendant CGI Federal Inc.'s counsel regarding them and responsive information and documents. • Confer and correspond with Defendant CGI Federal Inc. and mediators regarding mediator selection and availability and scheduling. • Agree upon Jeffrey Ross Esq. for mediation in February and draft multiple e-mails and respond regarding scheduling. • Book mediation and begin preparation after finalizing scheduling based on parties and counsel schedules and availability and that of the mediator. • Confer with Plaintiff regarding mediation and availability, and review multiple correspondences from Plaintiff regarding ongoing claims and issues to address with Defendant CGI Federal Inc. • Draft stipulations and file all documents regarding conferences and case management dates and continuances for mediation. 	15	April 2018 – February 2019
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<p><u>6. Complete Initial Informal Discovery, Plaintiff’s Deposition, Mediation Preparation, and Conduct Mediation and further discovery meet and confer –</u></p> <ul style="list-style-type: none"> • Prepare Plaintiff for his deposition and participate in Plaintiff’s deposition. • Prepare and enter into a stipulation for protective order. • Draft correspondence with Defendant CGI Federal Inc.’s counsel and mediator regarding mediation and scheduling. • Complete informal discovery and production of documents and Class Member’s data. • Review all production and file documents and policy documents and compile key exhibits and documents for mediation. • Confer and correspond with Defendant CGI Federal Inc.’s counsel regarding Class Member’s data and numbers agreed upon and extrapolated for mediation. • Complete and draft calculations of Defendant CGI Federal Inc.’s potential liability exposure and summarize defenses to each and alleged bases for reduction in calculated numbers. • Conduct case law review and research regarding accurate wage statements. • Draft mediation brief, address background and procedure and discovery completed, address relevant policies of Defendant CGI Federal Inc. and each of Plaintiff’s claims, and the facts and law supporting them, and research and calculate potential estimated damages and penalties exposure. • Travel to and from and conduct full day mediation in Oakland. Complete conferences with defense counsel regarding Settlement and general terms. • Draft correspondence following mediation with mediator and confer regarding continued efforts to finalize settlement terms. Agree to and address general terms for settlement and begin drafting agreement. 	<p>27</p>	<p>February 2019</p>
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<p><u>7. Finalizing Settlement Agreement and Terms –</u></p> <ul style="list-style-type: none"> • Draft and correspond with Defense counsel regarding Memorandum of Agreement and attend to finalizing and executing. • Draft stipulation to continue case management conference to complete Settlement Agreement and attend to filing. • Draft long form Settlement Agreement and conduct multiple conferences and correspondence with defense counsel regarding detailed terms and revisions. • Multiple correspondence and conferences with defense counsel regarding settlement terms and revisions and additions. • Draft Class Member’s Notice and e-mails regarding same and finalizations after editing. • Confer with administrators and receive quotations and agree on estimate and administrator. • Conduct multiple conferences with Plaintiff regarding Settlement and terms and responding to his questions and concerns. • Finalize Settlement Agreement and attend to execution and confer and correspond with Plaintiff regarding same. 	10	February 2019 – July 2019
<p><u>8. Motion for Preliminary Approval, Hearing, and Begin Administration:</u></p> <ul style="list-style-type: none"> • Draft motion for preliminary approval of the Settlement, and supporting documents and declarations and attend to filing. • Conduct multiple conferences and exchange correspondence with defense counsel regarding MPA documents and revisions as required. • Continue to receive and respond to inquiries from Class members. • Appear for preliminary approval hearings after reviewing Court’s tentative rulings. Confer with Court and Defendant CGI Federal Inc.’s counsel regarding Settlement and terms after reviewing the Court’s tentative ruling granting preliminary approval. • Review Court’s Order granting preliminary approval after entry and provide to Administrator to begin administration process. 	15	November 2019- May 2020

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<p><u>9. Initiate and Complete Settlement Administration –</u></p> <ul style="list-style-type: none"> • Confer and correspond with defense counsel and Administrator regarding settlement administration, class data, and initial mailing. • Attend to initial mailing and correspondence with administrator regarding same. • Address administration timeline and initial calculations with administrator in e-mails and conferences. • Confer and correspond with Administrator regarding web-site for case and getting it set up and posting the documents to it. • Address questions regarding administration and review weekly administration reports, and draft correspondence regarding same. • Receive and respond to calls and correspondence from Class members regarding Settlement and terms and coverage and entities to which it applied. 	2	May 2020 – June 2020
<p><u>10. Motion for Attorneys’ Fees and Expenses and Plaintiff’s Enhancement Fee–</u></p> <ul style="list-style-type: none"> • Confer and correspond with Plaintiff regarding declaration and enhancement. • Meet and confer and correspond with administrator and administration declaration. • Complete lodestar cross check and confer and correspond with Defense counsel regarding document drafts and required revision. • Finalize and filing motion for attorneys’ fees and expenses and plaintiff’s enhancement fee, including motion and memorandum and all supporting declarations and proposed order/judgment. • 	5	June 2020- Present
TOTAL:	147 Hrs.	