

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
COURT FILE NO.: 0:24-cv-02670-SGE**

Nick Hansen and Meghan Arquette, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Renters Warehouse, LLC,

Defendant and Third-Party
Plaintiff,

v.

Vardhan Yedla Srinivasa Harsha
and Gauri V. Yedla,

Third-Party Defendants.

**DECLARATION OF RYAN D.
PETERSON IN SUPPORT OF CLASS
COUNSEL’S UNOPPOSED MOTION
FOR AN AWARD OF ATTORNEYS’
FEES, REIMBURSEMENT OF
LITIGATION EXPENSES, AND
SERVICE AWARDS**

I, Ryan D. Peterson, make this Declaration in support of Class Counsel’s Unopposed Motion for an Award of Attorneys’ Fees, Reimbursement of Litigation Expenses, and Service Awards. I make this Declaration based upon my personal knowledge, except for those matters stated on information and belief, and as to those matters I am informed about and believe them to be true. If called upon to testify, I could and would competently testify to the matters set forth herein.

1. I am a licensed attorney in the State of Minnesota and the owner of Peterson Legal, PLLC (“Peterson Legal”), which I founded in May 2017. I have been licensed to practice law since 2008 and have focused my practice on consumer rights

litigation since 2013. I received my Juris Doctor from William Mitchell College of Law (now Mitchell Hamline School of Law) in 2008, was admitted to practice in Minnesota in 2009, and remain a member of the Minnesota bar in good standing.

2. I am one of the attorneys appointed by the Court as Class Counsel in this action, together with Thomas J. Lyons, Jr. and Carter B. Lyons of Consumer Justice Center, P.A. (“CJC”). I have been actively involved in this matter from its inception and have personal knowledge of the work I performed.

3. Plaintiffs and the Settlement Class have been represented on a contingent-fee basis. Peterson Legal has received no compensation for my time in this matter and assumed the risk that it would receive no fee if the litigation was unsuccessful.

4. I maintained contemporaneous time records in this action through the practice management software Clio.

5. This action was commenced on July 10, 2024, and alleged that Renters Warehouse improperly deducted amounts from Minnesota residential tenants’ security deposits in violation of Minn. Stat. § 504B.178 and related law. Renters Warehouse twice moved to dismiss the claims and strike the class allegations. Following full briefing, and oral argument that I presented on behalf of Plaintiffs, the Court denied the renewed motions from the bench on January 28, 2025.

6. The litigation thereafter involved substantial written and document discovery, review of Renters Warehouse’s tenant and security-deposit records, discovery disputes and meet-and-confers, motion practice concerning amendment of the pleadings and the scheduling order, preparation for class certification, deposition-related work, and extensive settlement negotiations.

7. Among other things, my work in this action included drafting the amended complaint; drafting Plaintiffs' memorandum opposing the renewed motion to dismiss and arguing the renewed motions; drafting the proposed second amended complaint and the motion for leave to amend, and arguing that motion; preparing Plaintiffs' answers to Renters Warehouse's written discovery; subpoenaing and deposing Miles Cudworth, Renters Warehouse's former security-deposit coordinator; attending the deposition of third-party defendant Vardhan Yedla Srinivasa Harsha; helping oppose Renters Warehouse's request to file an early summary judgment motion; personally reviewing all 1,712 tenant ledgers Renters Warehouse produced and preparing the contested-deduction analysis used in settlement negotiations; preparing for and participating in the settlement conference; reviewing and revising the Settlement Agreement; auditing Renters Warehouse's class member data and working with the Settlement Administrator; and preparing the preliminary approval papers, including my declaration on the ledger review, and attending the preliminary approval hearing.

8. The parties participated in a full-day settlement conference before Magistrate Judge Shannon G. Elkins on February 5, 2026, which I attended with Mr. Lyons and Plaintiff Nick Hansen. Although the case did not settle during the conference itself, Judge Elkins issued a mediator's proposal that the parties ultimately accepted. Counsel thereafter negotiated and documented the comprehensive class settlement now before the Court.

9. The Settlement Agreement establishes a \$195,000.00 non-reversionary Settlement Fund for approximately 2,337 class-member accounts. The Settlement Fund will be used for payments to Settlement Class Members, settlement administration

expenses, any Court-approved service awards, and any Court-approved award of attorneys' fees and expenses. No portion of the Settlement Fund reverts to Renters Warehouse.

10. Under the Settlement Agreement, Class Counsel agreed to limit their request for attorneys' fees and unreimbursed expenses to no more than 33.3% of the Settlement Fund. Class Counsel now requests \$65,000.00 in attorneys' fees, which is one-third of the \$195,000.00 Settlement Fund, together with reimbursement of reasonable litigation expenses as set forth in the Motion and supporting materials.

11. My time records through September 24, 2026, reflect a total of 146.0 attorney hours. At the hourly rate of \$450.00 that I request, my lodestar is \$65,700.00.

12. I have not included any time before July 8, 2024, including my pre-suit investigation of Plaintiffs' claims and my drafting of the original complaint. I also recorded 6.2 hours for routine tasks, such as reviewing ECF notices, e-filing, handling scheduling and deposition logistics, and reading emails on which I was copied, at no charge. Those hours are not included in the 146.0 hours or the lodestar stated above.

13. A true and correct copy of my time and expense records for this matter, generated from Clio, is attached hereto as Exhibit A. Exhibit A lists the 146.0 hours stated above and the expenses described in paragraph 14; its totals of \$67,076.25 combine my \$65,700.00 lodestar and \$1,376.25 in expenses. I have carefully reviewed those records. The work reflected in them was performed, and the expenses were incurred, for the benefit of Plaintiffs and the Settlement Class, and both were reasonably necessary to prosecute and resolve this action.

14. Peterson Legal incurred \$1,376.25 in litigation expenses in this action and seeks reimbursement of that amount: \$117.90 to Metro Legal Services for service of the subpoena on Mr. Cudworth, and \$1,258.35 to Lexitas for the court reporter and transcript of Mr. Cudworth's deposition on January 2, 2026.

15. I request that my time be compensated at an hourly rate of \$450.00. Based upon my experience in consumer-protection litigation, including my work as Class Counsel in this action, and my knowledge of the rates charged by consumer attorneys in the Twin Cities, I believe that rate is reasonable and consistent with the rates charged by attorneys of comparable experience for complex consumer litigation in this District. It is also below the \$600.00 hourly rate of Mr. Lyons, who has practiced complex consumer litigation for more than thirty years.

16. No court has approved an hourly rate for me higher than \$365.00. In *Berscheid v. Experian Info. Sols., Inc.*, No. 22-cv-086 (JRT/LIB), 2023 WL 3750182 (D. Minn. June 1, 2023), I requested \$365.00 per hour, which was then the rate my hourly clients paid. The defendant asked the court to reduce my rate to \$325.00. The court rejected that request and found \$365.00 reasonable, considering my experience, the average market rate for similar attorneys, and inflation since the Minnesota Court of Appeals awarded my fees at \$350.00 per hour in 2019. *Id.* at *4. Since 2023, the clients who retain me on an hourly basis have paid me \$400.00 per hour, which is the rate I disclosed to this Court in August 2025 in a declaration supporting another consumer attorney's fee request. *Singh v. Experian Info. Sols., Inc.*, No. 25-cv-00378 (KMM/DJF), Dkt. 61 ¶ 5 (D. Minn. Aug. 28, 2025).

17. The rate I request here is higher than those rates for two reasons. First, the work was different. This was a contested class action in which the Court appointed me as Class Counsel, and the work described in paragraph 7 above demanded more of me than the individual matters for which clients retain me by the hour. Second, my experience has grown substantially since the work at issue in *Berscheid*. In November 2023, I joined the Consumer Justice Law Firm, PLC as Senior Counsel, where I represent consumers nationwide in Fair Credit Reporting Act litigation involving credit reporting errors, mixed files, and background check errors. Since 2023, I have been admitted to practice before eight additional United States District Courts and before the United States Courts of Appeals for the Third, Eighth, and Ninth Circuits. I have obtained reported decisions in *Hansen v. Santander Bank, N.A.*, No. 22-cv-3048 (SRN/TNL), 2023 U.S. Dist. LEXIS 150926 (D. Minn. Aug. 28, 2023); *Kowouto v. Jellum Law, P.A.*, 750 F. Supp. 3d 973 (D. Minn. 2024); and *Paulino v. Western Funding II, Inc.*, 737 F. Supp. 3d 1338 (S.D. Fla. 2024). I have served on the board of the Minnesota State Bar Association's Consumer and Creditor Law Section since 2023 and as its Co-Chair since 2025.

18. I am familiar with the rates charged by consumer attorneys in the Twin Cities. In December 2025, this Court cited my declaration on that subject in finding a \$425.00 hourly rate reasonable for an out-of-state consumer attorney in an individual Fair Credit Reporting Act case. *Singh*, Dkt. 75 (D. Minn. Dec. 9, 2025). Courts in this District have found \$425.00 per hour reasonable for consumer attorneys with approximately fourteen years of experience in individual cases, *Keating v. Frederick Debt Mgmt., LLC*, No. 24-cv-3659 (ECT/EMB), 2025 WL 2506125, at *3 (D. Minn. Sept. 2, 2025); *Singh*, Dkt. 75, and found \$550.00 per hour reasonable in 2021 for a consumer attorney with

nearly twenty-five years of experience, *Hashi v. Law Offices of David M. Katz P.C.*, No. 20-cv-02443 (SRN/ECW), 2021 U.S. Dist. LEXIS 66624, at *3-4 (D. Minn. Apr. 6, 2021). In *Berscheid*, the court took the \$350.00 median hourly rate for Minnesota consumer attorneys in 2015 and 2016 found in *Kuntz v. Messerli & Kramer P.A.*, No. 16-cv-2676 (JNE/BRT), 2017 WL 3332222, at *3 (D. Minn. Aug. 4, 2017), and calculated that it equaled approximately \$431.00 in November 2022 after adjusting for inflation with the Bureau of Labor Statistics CPI Inflation Calculator. *Berscheid*, 2023 WL 3750182, at *4 & n.4. The same calculation through August 2026 yields approximately \$486.00, which is above the \$450.00 rate I request. I have practiced law since 2008, and including the three years I spent as the managing attorney of a high-volume collection practice before I began representing consumers in 2013, I have litigated consumer-credit matters for more than fifteen years.

19. Since 2013, I have represented hundreds of individuals in consumer law, debt collection, and landlord-tenant matters. Over 90% of my practice is devoted to representing individuals as plaintiffs in consumer law litigation or as defendants in debt collection actions. I regularly represent consumers in state and federal court in matters arising under the Fair Debt Collection Practices Act, the Fair Credit Reporting Act, the Telephone Consumer Protection Act, the Electronic Fund Transfer Act, and Minnesota consumer and landlord-tenant statutes, including Minn. Stat. § 504B.178. My earlier reported decisions include *Worley v. Engel*, No. 17-cv-1105 (PAM/SER), 2017 U.S. Dist. LEXIS 111729 (D. Minn. July 18, 2017) (holding that the Fair Debt Collection Practices Act applies to evictions for non-payment of rent in Minnesota), and *Kowouto v. Jellum Law, P.A.*, 672 F. Supp. 3d 699 (D. Minn. 2023). I have presented continuing legal

education programs on consumer law to the Minnesota State Bar Association, including “Consumers are Tenants, Too: The Intersection of Consumer and Landlord/Tenant Law” (October 18, 2023) and “Extra Credit: How the FCRA Governs Criminal Background Checks” (April 23, 2025). *See* ECF 105-1.

20. The time and labor required in this case were substantial. The matter required counsel to litigate two rounds of motions directed at the pleadings and class allegations, conduct extensive discovery, analyze a large volume of tenant records and related documents, address fact-intensive issues concerning security-deposit deductions, prepare for class certification, and negotiate a detailed class-wide settlement.

21. The case also presented difficult legal and factual issues concerning the application of Minnesota’s security-deposit statute to Renters Warehouse’s practices on a class-wide basis. Prosecuting the matter required substantial experience in complex litigation, class-action procedure, consumer-protection law, discovery, and settlement administration.

22. Peterson Legal is a small firm whose practice is focused on consumer-protection litigation. The time I devoted to this litigation necessarily precluded me from devoting that time to other matters. Because the representation was entirely contingent, Peterson Legal bore the risk of devoting substantial attorney time and resources to this case without receiving any compensation if Plaintiffs and the putative class did not recover.

23. The settlement provides a certain, immediate, non-reversionary monetary recovery while avoiding the substantial additional expense, delay, and risk associated with contested class certification, summary judgment, trial, and any appeal. In my

professional judgment, the result obtained is favorable to the Settlement Class in light of the risks and costs of continued litigation.

24. Plaintiffs Nick Hansen and Meghan Arquette remained available to counsel throughout the litigation, assisted counsel with the facts and documents relevant to their claims, communicated with counsel regarding litigation and settlement strategy, and reviewed and approved the Settlement Agreement. Mr. Hansen also attended the full-day settlement conference. The Settlement Agreement permits a total service award of up to \$15,000.00, subject to Court approval.

25. Based upon my experience, my involvement in this matter, my review of my own and CJC's time records, and the result obtained for the Settlement Class, I believe the requested attorneys' fee award is fair and reasonable. The requested \$65,000.00 fee is less than my lodestar of \$65,700.00 alone, and it is approximately 33% of Class Counsel's combined lodestar of \$199,771.83, before considering the additional work required through final approval and settlement administration. The reasonableness of the requested fee does not depend on my requested rate. At \$365.00 per hour, the rate approved in *Berscheid*, my lodestar would be \$53,290.00, Class Counsel's combined lodestar would be \$187,361.83, and the requested fee would be approximately 35% of it.

26. I anticipate that Class Counsel will continue to devote time to this matter through final approval and completion of the settlement, including responding to questions from Settlement Class Members, coordinating with the Settlement Administrator, preparing final-approval papers, addressing any objections, attending the Final Approval Hearing, and overseeing implementation and distribution of the

Settlement Fund. I estimate that my own additional time through final approval and distribution will total 10 to 17 hours.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 30th day of September 2026.

Respectfully submitted,

/s/ Ryan D. Peterson

Ryan D. Peterson, Esq.

Attorney I.D. #: 0389607

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EXHIBIT A

Client activity
09/29/2026
10:32 AM

Client activity

Dates: 2024-07-08 - 2026-09-24

Nick Hansen

00649-Hansen: Meghan Arquette, Nick Hansen vs. Renters Warehouse, MNSF LLC (Ryan Peterson)

Date	Type	Category	Status	User	Description	Quantity	Price	Total
07/31/2024	Hourly time entry		Unbilled	Ryan Peterson	Review Defendant's motion to dismiss (ECF 6), supporting memorandum (ECF 8), Lawrence declaration and exhibits (ECF 9), and motion to strike class allegations with memorandum (ECF 12, 14).	1.5h	\$450.00	\$675.00
08/02/2024	Hourly time entry		Unbilled	Ryan Peterson	Confer with T. Lyons re plan for responding to Defendant's motion to dismiss and motion to strike, before his email to defense counsel.	0.3h	\$450.00	\$135.00
08/07/2024	Hourly time entry		Unbilled	Ryan Peterson	Revise draft joint motion modifying briefing schedule on motion to dismiss and motion to strike (30 additional days to respond or amend); return edits to T. Lyons and A. Weber.	0.5h	\$450.00	\$225.00
08/07/2024	Hourly time entry		Unbilled	Ryan Peterson	Participate in Rule 7.1 meet-and-confer call with R. Lawrence and T. Lyons re Defendant's motions and extension of briefing schedule.	0.3h	\$450.00	\$135.00
09/03/2024	Hourly time entry		Unbilled	Ryan Peterson	Draft amended class action complaint responding to arguments in Defendant's motion to dismiss and motion to strike; circulate draft to T. Lyons and A. Weber.	4.0h	\$450.00	\$1,800.00
09/04/2024	Hourly time entry		Unbilled	Ryan Peterson	Incorporate T. Lyons redlines and finalize amended complaint for filing.	0.5h	\$450.00	\$225.00
09/04/2024	Hourly time entry		Unbilled	Ryan Peterson	Email clients the amended complaint for review and approval; review N. Hansen's approval.	0.2h	\$450.00	\$90.00
09/26/2024	Hourly time entry		Unbilled	Ryan Peterson	Review Defendant's renewed motion to dismiss and memorandum (ECF 25, 27; 4,753 words) and renewed motion to	1.0h	\$450.00	\$450.00

				strike class allegations and memorandum (ECF 30, 32; 3,307 words).			
10/02/2024	Hourly time entry	Unbilled	Ryan Peterson	Email T. Lyons allocating opposition briefing (RDP to oppose motion to dismiss; T. Lyons to oppose motion to strike).	0.1h	\$450.00	\$45.00
10/08/2024	Hourly time entry	Unbilled	Ryan Peterson	Email T. Lyons and A. Weber re extension aligning response deadlines on both renewed motions.	0.1h	\$450.00	\$45.00
10/09/2024	Hourly time entry	Unbilled	Ryan Peterson	Review and approve stipulation and proposed order modifying briefing schedule on renewed motions; confirm briefing assignments with T. Lyons.	0.2h	\$450.00	\$90.00
10/22/2024	Hourly time entry	Unbilled	Ryan Peterson	Review T. Lyons draft memorandum opposing renewed motion to strike class allegations; reply with comments.	1.0h	\$450.00	\$450.00
10/29/2024	Hourly time entry	Unbilled	Ryan Peterson	Research and outline opposition to renewed motion to dismiss; analyze Defendant's memorandum and Lawrence declaration exhibits.	2.5h	\$450.00	\$1,125.00
10/29/2024	Hourly time entry	Unbilled	Ryan Peterson	Email N. Hansen requesting copy of Renters Warehouse's partial deposit refund check for opposition brief.	0.1h	\$450.00	\$45.00
10/30/2024	Hourly time entry	Unbilled	Ryan Peterson	Draft memorandum opposing renewed motion to dismiss.	1.8h	\$450.00	\$810.00
10/30/2024	Hourly time entry	Unbilled	Ryan Peterson	Confer with T. Lyons and negotiate with R. Lawrence re 14-day extension of opposition deadline and resetting hearing; draft joint motion and proposed order modifying briefing schedule; review and incorporate R. Lawrence's edits.	1.3h	\$450.00	\$585.00
10/31/2024	Hourly time entry	Unbilled	Ryan Peterson	Continue drafting memorandum opposing renewed motion to dismiss.	2.8h	\$450.00	\$1,260.00
11/12/2024	Hourly time entry	Unbilled	Ryan Peterson	Email courtroom deputy and counsel confirming January 9, 2025 hearing date.	0.1h	\$450.00	\$45.00
11/13/2024	Hourly time entry	Unbilled	Ryan Peterson	Complete draft memorandum opposing renewed motion to dismiss (5,141 words); send to T. Lyons and A. Weber for review.	4.6h	\$450.00	\$2,070.00
11/14/2024	Hourly time entry	Unbilled	Ryan Peterson	Review T. Lyons edits; finalize opposition memorandum and word count certificate.	0.9h	\$450.00	\$405.00
12/02/2024	Hourly time entry	Unbilled	Ryan Peterson	Email N. Hansen status update on motion briefing and January argument.	0.1h	\$450.00	\$45.00

12/05/2024	Hourly time entry	Unbilled	Ryan Peterson	Review Defendant's reply memorandum in support of renewed motion to dismiss (ECF 46; 2,594 words).	0.5h	\$450.00	\$225.00
01/03/2025	Hourly time entry	Unbilled	Ryan Peterson	Emails with courtroom deputy and counsel resetting hearing (January 9 vacated) to January 28, 2025 at 9:30 a.m.	0.2h	\$450.00	\$90.00
01/27/2025	Hourly time entry	Unbilled	Ryan Peterson	Prepare for oral argument on renewed motion to dismiss (ECF 25) and motion to strike class allegations (ECF 30): review briefing (ECF 27, 32, 39, 45, 46), key authorities, and record; prepare argument outline.	4.0h	\$450.00	\$1,800.00
01/27/2025	Hourly time entry	Unbilled	Ryan Peterson	Review R. Lawrence notice of incorrect lease exhibit and corrected declaration and lease (ECF 48); respond.	0.3h	\$450.00	\$135.00
01/27/2025	Hourly time entry	Unbilled	Ryan Peterson	Call with T. Lyons re outline of argument for hearing on renewed motion to dismiss and motion to strike.	0.3h	\$450.00	\$135.00
01/28/2025	Hourly time entry	Unbilled	Ryan Peterson	Attend and argue hearing on renewed motion to dismiss and motion to strike class allegations before Judge Menendez (9:41 to 10:34 a.m.; both motions denied from the bench).	1.0h	\$450.00	\$450.00
01/28/2025	Hourly time entry	Unbilled	Ryan Peterson	Round-trip travel between Edina office and Minneapolis federal courthouse for hearing.	0.8h	\$450.00	\$360.00
01/28/2025	Hourly time entry	Unbilled	Ryan Peterson	Post-hearing call with T. Lyons re bench ruling denying both motions and next steps.	0.2h	\$450.00	\$90.00
02/25/2025	Hourly time entry	Unbilled	Ryan Peterson	Review Defendant's third-party complaint against property owners (ECF 52) and answer to amended complaint (ECF 53); email T. Lyons assessment.	0.5h	\$450.00	\$225.00
03/10/2025	Hourly time entry	Unbilled	Ryan Peterson	Review third-party defendants' answer to third-party complaint (ECF 59) and T. Lyons email re contacting their counsel.	0.2h	\$450.00	\$90.00
03/11/2025	Hourly time entry	Unbilled	Ryan Peterson	Email T. Lyons confirming call with J. Van Nurden, counsel for third-party defendants.	0.1h	\$450.00	\$45.00
03/14/2025	Hourly time entry	Unbilled	Ryan Peterson	Prepare for and participate in call with T. Lyons and J. Van Nurden re case strategy and third-party claims.	1.0h	\$450.00	\$450.00
04/14/2025	Hourly time entry	Unbilled	Ryan Peterson	Review and revise pretrial confidential settlement letter to Magistrate Judge	0.5h	\$450.00	\$225.00

Elkins.							
04/14/2025	Hourly time entry	Unbilled	Ryan Peterson	Review and revise first set of interrogatories, requests for admission, and requests for production to Renters Warehouse (class-focused additions).	1.5h	\$450.00	\$675.00
04/21/2025	Hourly time entry	Unbilled	Ryan Peterson	Draft interrogatories and requests for production to third-party defendants.	1.2h	\$450.00	\$540.00
04/22/2025	Hourly time entry	Unbilled	Ryan Peterson	Finalize and serve interrogatories and requests for production to third-party defendants.	0.8h	\$450.00	\$360.00
04/22/2025	Hourly time entry	Unbilled	Ryan Peterson	Prepare for and attend telephonic Rule 16 pretrial conference before Magistrate Judge Elkins (1:00 to 1:30 p.m.), including pre-conference call with T. Lyons.	0.9h	\$450.00	\$405.00
04/25/2025	Hourly time entry	Unbilled	Ryan Peterson	Review pretrial scheduling order (ECF 63).	0.2h	\$450.00	\$90.00
04/29/2025	Hourly time entry	Unbilled	Ryan Peterson	Review Renters Warehouse's and third-party defendants' Rule 26(a)(1) initial disclosures.	0.3h	\$450.00	\$135.00
04/30/2025	Hourly time entry	Unbilled	Ryan Peterson	Review Plaintiffs' initial disclosures; make revision; assemble documents (Hansen000001 to Hansen000071) for production.	0.4h	\$450.00	\$180.00
05/01/2025	Hourly time entry	Unbilled	Ryan Peterson	Email T. Lyons re deposing witnesses identified in Defendant's disclosures (including M. Cudworth).	0.1h	\$450.00	\$45.00
05/15/2025	Hourly time entry	Unbilled	Ryan Peterson	Review Renters Warehouse's answers to interrogatories and responses to document requests and requests for admission (Set 1).	1.0h	\$450.00	\$450.00
05/20/2025	Hourly time entry	Unbilled	Ryan Peterson	Review stipulation and proposed protective order and email counsel for comments; email R. Downes re timing of document production.	0.4h	\$450.00	\$180.00
05/20/2025	Hourly time entry	Unbilled	Ryan Peterson	Call with T. Lyons re protective order, timing of Defendant's document production, and deficiencies in Defendant's discovery responses.	0.3h	\$450.00	\$135.00
05/23/2025	Hourly time entry	Unbilled	Ryan Peterson	Review third-party defendants' answers to interrogatories, responses to document requests, and document production.	0.5h	\$450.00	\$225.00
05/28/2025	Hourly time	Unbilled	Ryan Peterson	Email clients the third-party defendants'	0.1h	\$450.00	\$45.00

	entry			discovery responses.			
05/28/2025	Hourly time entry	Unbilled	Ryan Peterson	Status call with clients (with T. Lyons).	0.5h	\$450.00	\$225.00
06/12/2025	Hourly time entry	Unbilled	Ryan Peterson	Call with T. Lyons re third-party defendants' document production.	0.3h	\$450.00	\$135.00
06/18/2025	Hourly time entry	Unbilled	Ryan Peterson	Meet with T. Lyons re next steps (discussion portion of lunch meeting).	0.5h	\$450.00	\$225.00
06/19/2025	Hourly time entry	Unbilled	Ryan Peterson	Email T. Lyons and A. Weber re sending draft discovery responses to clients and scheduling client call.	0.1h	\$450.00	\$45.00
06/23/2025	Hourly time entry	Unbilled	Ryan Peterson	Schedule discovery call with M. Arquette.	0.1h	\$450.00	\$45.00
06/25/2025	Hourly time entry	Unbilled	Ryan Peterson	Call with clients reviewing Renters Warehouse's interrogatories and document requests.	0.5h	\$450.00	\$225.00
06/25/2025	Hourly time entry	Unbilled	Ryan Peterson	Follow-up email to clients (rent escrow affidavit; requests for photos, videos, owner communications, and documents).	0.3h	\$450.00	\$135.00
07/07/2025	Hourly time entry	Unbilled	Ryan Peterson	Request seven-day extension from R. Lawrence to respond to Defendant's written discovery.	0.1h	\$450.00	\$45.00
07/09/2025	Hourly time entry	Unbilled	Ryan Peterson	Review status letter to Magistrate Judge Elkins; approve.	0.2h	\$450.00	\$90.00
07/13/2025	Hourly time entry	Unbilled	Ryan Peterson	Draft Plaintiffs' answers to Renters Warehouse's interrogatories and responses to document requests; send to T. Lyons.	2.5h	\$450.00	\$1,125.00
07/14/2025	Hourly time entry	Unbilled	Ryan Peterson	Review T. Lyons edits to discovery responses; send responses to clients for review and verification; request extension to July 18 from R. Lawrence.	0.4h	\$450.00	\$180.00
07/16/2025	Hourly time entry	Unbilled	Ryan Peterson	Review Plaintiffs' second set of requests for production to Renters Warehouse; add request.	0.4h	\$450.00	\$180.00
07/18/2025	Hourly time entry	Unbilled	Ryan Peterson	Call with clients re verifications and supplemental information; review client photos and updates; finalize and serve Plaintiffs' answers to interrogatories and responses to document requests with document production.	1.8h	\$450.00	\$810.00
07/28/2025	Hourly time entry	Unbilled	Ryan Peterson	Draft proposed second amended complaint (redline); send to T. Lyons.	3.0h	\$450.00	\$1,350.00

07/30/2025	Hourly time entry	Unbilled	Ryan Peterson	Email T. Lyons re seeking consent to amend or proceeding by motion.	0.1h	\$450.00	\$45.00
07/31/2025	Hourly time entry	Unbilled	Ryan Peterson	Email proposed second amended complaint to defense and third-party counsel requesting consent.	0.2h	\$450.00	\$90.00
08/01/2025	Hourly time entry	Unbilled	Ryan Peterson	Draft motion for leave to amend, memorandum of law (1,020 words), meet-and-confer statement, notice of hearing, proposed order, word count certificate, and exhibits (clean and redline proposed pleading).	2.7h	\$450.00	\$1,215.00
08/04/2025	Hourly time entry	Unbilled	Ryan Peterson	Confer with T. Lyons; agree to Defendant's requested extension to respond to motion to amend; review joint stipulation and authorize e-signature.	0.2h	\$450.00	\$90.00
08/19/2025	Hourly time entry	Unbilled	Ryan Peterson	Review Renters Warehouse's opposition to motion to amend (ECF 75) and Lawrence declaration with exhibits (ECF 76); email T. Lyons re strategy for oral argument.	0.7h	\$450.00	\$315.00
08/22/2025	Hourly time entry	Unbilled	Ryan Peterson	Prepare for oral argument on motion to amend, including review of third-party defendants' response (ECF 77).	1.5h	\$450.00	\$675.00
08/22/2025	Hourly time entry	Unbilled	Ryan Peterson	Attend and argue motion to amend before Magistrate Judge Elkins (1:33 to 2:12 p.m.; denied from the bench).	0.8h	\$450.00	\$360.00
08/22/2025	Hourly time entry	Unbilled	Ryan Peterson	Round-trip travel between Edina office and Minneapolis federal courthouse for hearing.	0.8h	\$450.00	\$360.00
08/25/2025	Hourly time entry	Unbilled	Ryan Peterson	Email T. Lyons re debrief on motion to amend hearing.	0.1h	\$450.00	\$45.00
08/28/2025	Hourly time entry	Unbilled	Ryan Peterson	Participate in Local Rule 37.1 conference with R. Lawrence and T. Lyons re Defendant's responses to Plaintiffs' second set of document requests.	0.7h	\$450.00	\$315.00
09/05/2025	Hourly time entry	Unbilled	Ryan Peterson	Email counsel re scheduling Yedla deposition (October 1 availability).	0.1h	\$450.00	\$45.00
09/08/2025	Hourly time entry	Unbilled	Ryan Peterson	Call with T. Lyons re Renters Warehouse's proposal on class-wide document production.	0.4h	\$450.00	\$180.00
09/15/2025	Hourly time entry	Unbilled	Ryan Peterson	Review R. Lawrence request for Plaintiffs' position on early summary judgment; email T. Lyons.	0.2h	\$450.00	\$90.00

09/22/2025	Hourly time entry	Unbilled	Ryan Peterson	Review Renters Warehouse's letter to Judge Menendez requesting leave to file early summary judgment motion (ECF 79).	0.2h	\$450.00	\$90.00
09/24/2025	Hourly time entry	Unbilled	Ryan Peterson	Emails with T. Lyons and J. Van Nurden scheduling call re early summary judgment positions.	0.2h	\$450.00	\$90.00
09/25/2025	Hourly time entry	Unbilled	Ryan Peterson	Call with T. Lyons and J. Van Nurden re early summary judgment requests and upcoming Yedla deposition.	0.5h	\$450.00	\$225.00
09/26/2025	Hourly time entry	Unbilled	Ryan Peterson	Review third-party defendants' letter re early summary judgment (ECF 81); advise T. Lyons re response to R. Lawrence's discovery redlines.	0.2h	\$450.00	\$90.00
09/29/2025	Hourly time entry	Unbilled	Ryan Peterson	Review and revise Plaintiffs' letter to Judge Menendez opposing early summary judgment (ECF 82).	0.5h	\$450.00	\$225.00
10/01/2025	Hourly time entry	Unbilled	Ryan Peterson	Attend Renters Warehouse's remote deposition of third-party defendant Vardhan Yedla Srinivasa Harsha.	2.5h	\$450.00	\$1,125.00
10/01/2025	Hourly time entry	Unbilled	Ryan Peterson	Draft supplemental letter to Judge Menendez re early summary judgment based on Yedla testimony; send to T. Lyons.	1.5h	\$450.00	\$675.00
10/01/2025	Hourly time entry	Unbilled	Ryan Peterson	Post-deposition call with T. Lyons re Yedla testimony and next steps.	0.5h	\$450.00	\$225.00
10/02/2025	Hourly time entry	Unbilled	Ryan Peterson	Review order denying early summary judgment requests (ECF 83).	0.1h	\$450.00	\$45.00
10/03/2025	Hourly time entry	Unbilled	Ryan Peterson	Review and revise status letter to Magistrate Judge Elkins previewing extension of class certification deadline.	0.5h	\$450.00	\$225.00
10/14/2025	Hourly time entry	Unbilled	Ryan Peterson	Prepare for and participate in call with T. Lyons and meet-and-confer with all counsel re class certification deadline, property owner disclosures, and ledger production format.	1.2h	\$450.00	\$540.00
10/15/2025	Hourly time entry	Unbilled	Ryan Peterson	Review R. Lawrence email re reproduction of tenant ledgers as searchable PDFs and Defendant's positions on open disputes.	0.1h	\$450.00	\$45.00
10/17/2025	Hourly time entry	Unbilled	Ryan Peterson	Call with T. Lyons re review of Defendant's re-produced ledgers and next steps.	0.3h	\$450.00	\$135.00

10/21/2025	Hourly time entry	Unbilled	Ryan Peterson	Confer with T. Lyons; confirm to R. Lawrence Plaintiffs' position on informal dispute resolution.	0.2h	\$450.00	\$90.00
10/24/2025	Hourly time entry	Unbilled	Ryan Peterson	Review and revise T. Lyons draft memorandum supporting motion to amend scheduling order (class certification deadline).	0.6h	\$450.00	\$270.00
11/03/2025	Hourly time entry	Unbilled	Ryan Peterson	Call with T. Lyons re documents produced by Renters Warehouse.	0.5h	\$450.00	\$225.00
11/04/2025	Hourly time entry	Unbilled	Ryan Peterson	Email T. Lyons analysis of "Move Out Charges" ledgers under Minn. Stat. 504B.178, subd. 3, for class certification and merits.	0.6h	\$450.00	\$270.00
11/04/2025	Hourly time entry	Unbilled	Ryan Peterson	Review Renters Warehouse tenant ledger production (searchable reproduction of 10/15/2025), RW000742 through approximately RW001450, for deductions attributable to ordinary wear and tear or turnover maintenance (work performed 10/15/2025 to 11/4/2025).	4.2h	\$450.00	\$1,890.00
11/04/2025	Hourly time entry	Unbilled	Ryan Peterson	Review Renters Warehouse's opposition to motion to amend scheduling order (ECF 89) and Lawrence declaration with 17 exhibits (ECF 90).	0.8h	\$450.00	\$360.00
11/11/2025	Hourly time entry	Unbilled	Ryan Peterson	Review third-party defendants' response to motion to amend scheduling order (ECF 91).	0.2h	\$450.00	\$90.00
11/19/2025	Hourly time entry	Unbilled	Ryan Peterson	Schedule call with T. Lyons.	0.1h	\$450.00	\$45.00
11/21/2025	Hourly time entry	Unbilled	Ryan Peterson	Call with T. Lyons re upcoming hearing, comparison of document review findings, and need for deposition before class certification.	1.2h	\$450.00	\$540.00
11/26/2025	Hourly time entry	Unbilled	Ryan Peterson	Prepare for and participate in video hearing on motion to amend scheduling order before Magistrate Judge Elkins (2:00 to 2:30 p.m.; granted in part).	1.1h	\$450.00	\$495.00
12/02/2025	Hourly time entry	Unbilled	Ryan Peterson	Email R. Lawrence requesting meet-and-confer on production of property owner identities for the ledgers.	0.2h	\$450.00	\$90.00
12/03/2025	Hourly time entry	Unbilled	Ryan Peterson	Schedule meet-and-confer with R. Downes.	0.1h	\$450.00	\$45.00
12/04/2025	Hourly time entry	Unbilled	Ryan Peterson	Draft deposition and document subpoena to Miles Cudworth, document rider, and	0.8h	\$450.00	\$360.00

				notice of intent to serve subpoena.				
12/08/2025	Hourly time entry		Unbilled	Ryan Peterson	Meet-and-confer call with R. Downes re property owner identities and Defendant's anticipated class certification defenses.	0.4h	\$450.00	\$180.00
12/10/2025	Hourly time entry		Unbilled	Ryan Peterson	Email R. Downes recapping meet-and-confer and proposing stipulation in lieu of motion to compel.	0.4h	\$450.00	\$180.00
12/11/2025	Hourly time entry		Unbilled	Ryan Peterson	Review R. Lawrence response declining proposed stipulation.	0.2h	\$450.00	\$90.00
12/11/2025	Hourly time entry		Unbilled	Ryan Peterson	Finalize and serve subpoena to Miles Cudworth and notice of intent.	0.6h	\$450.00	\$270.00
12/11/2025	Hourly time entry		Unbilled	Ryan Peterson	Call with T. Lyons re meet-and-confer recap to R. Downes and R. Lawrence's response declining proposed stipulation.	0.3h	\$450.00	\$135.00
12/16/2025	Hourly time entry		Unbilled	Ryan Peterson	Review R. Lawrence emails re representation of M. Cudworth, objections to subpoena, and scheduling; reply requesting alternate dates; email T. Lyons re need for deposition before class certification.	0.3h	\$450.00	\$135.00
12/16/2025	Hourly time entry		Unbilled	Ryan Peterson	Confer with T. Lyons re his call with C. Olson exploring settlement.	0.1h	\$450.00	\$45.00
12/16/2025	Hard cost entry	Service of Process	Unbilled	Ryan Peterson	Metro Legal Services, service of subpoena on Miles Cudworth (Inv. 3616537).	1.0	\$117.90	\$117.90
12/22/2025	Hourly time entry		Unbilled	Ryan Peterson	Email R. Lawrence re call availability and deposition dates.	0.1h	\$450.00	\$45.00
12/23/2025	Hourly time entry		Unbilled	Ryan Peterson	Meet-and-confer call with R. Lawrence re deposition date and scope of document rider; review confirming emails.	0.3h	\$450.00	\$135.00
12/30/2025	Hourly time entry		Unbilled	Ryan Peterson	Email T. Lyons re call with brief writer on class certification memorandum.	0.1h	\$450.00	\$45.00
12/31/2025	Hourly time entry		Unbilled	Ryan Peterson	Prepare for Cudworth deposition: review Renters Warehouse production (RW000003 to RW000737), select exhibits, and draft examination outline.	3.0h	\$450.00	\$1,350.00
01/01/2026	Hourly time entry		Unbilled	Ryan Peterson	Continue deposition preparation (additional ledger exhibit RW003503; outline revisions).	0.8h	\$450.00	\$360.00
01/02/2026	Hourly time entry		Unbilled	Ryan Peterson	Finalize Cudworth deposition outline.	0.5h	\$450.00	\$225.00

01/02/2026	Hourly time entry		Unbilled	Ryan Peterson	Take deposition of Miles Cudworth, Renters Warehouse's former security-deposit coordinator (9:00 a.m. to approximately noon).	3.0h	\$450.00	\$1,350.00
01/02/2026	Hourly time entry		Unbilled	Ryan Peterson	Confer with T. Lyons; request expedited transcript.	0.2h	\$450.00	\$90.00
01/02/2026	Hard cost entry	Deposition Transcript	Unbilled	Ryan Peterson	Lexitas court reporter and transcript, deposition of Miles Cudworth (Inv. 265417, 265591).	1.0	\$1,258.35	\$1,258.35
01/07/2026	Hourly time entry		Unbilled	Ryan Peterson	Send Cudworth transcript and key exhibits to T. Lyons and brief writer for class certification memorandum; respond to T. Lyons re flagged testimony.	0.2h	\$450.00	\$90.00
01/08/2026	Hourly time entry		Unbilled	Ryan Peterson	Check record citations in draft class certification memorandum; pull supporting Renters Warehouse documents and ledgers for brief writer.	0.7h	\$450.00	\$315.00
01/22/2026	Hourly time entry		Unbilled	Ryan Peterson	Review T. Lyons draft class settlement demand terms.	0.1h	\$450.00	\$45.00
01/22/2026	Hourly time entry		Unbilled	Ryan Peterson	Discuss settlement demand and settlement conference logistics with clients and T. Lyons.	0.3h	\$450.00	\$135.00
01/26/2026	Hourly time entry		Unbilled	Ryan Peterson	Complete review of remaining tenant ledgers through RW005553 (all 1,712 produced); record Bates number, stated basis, and amount for each contested deduction (540 ledgers; 861 line items); prepare contested-deduction spreadsheet (\$437,931.28) (work performed 11/5/2025 to 1/26/2026).	26.3h	\$450.00	\$11,835.00
01/26/2026	Hourly time entry		Unbilled	Ryan Peterson	Email T. Lyons spreadsheet methodology (inclusion and exclusion rules) and topline figures.	0.4h	\$450.00	\$180.00
01/26/2026	Hourly time entry		Unbilled	Ryan Peterson	Review T. Lyons draft Rule 408 demand email to C. Olson; recommend revisions.	0.2h	\$450.00	\$90.00
01/26/2026	Hourly time entry		Unbilled	Ryan Peterson	Call with T. Lyons re ledger review findings and damages spreadsheet.	0.4h	\$450.00	\$180.00
01/26/2026	Hourly time entry		Unbilled	Ryan Peterson	Participate in settlement meet-and-confer with all counsel required by the order for settlement conference.	0.5h	\$450.00	\$225.00
01/27/2026	Hourly time entry		Unbilled	Ryan Peterson	Review C. Olson response disputing spreadsheet categories; email T. Lyons.	0.3h	\$450.00	\$135.00
01/28/2026	Hourly time		Unbilled	Ryan Peterson	Call with T. Lyons re Defendant's	0.5h	\$450.00	\$225.00

	entry			response and confidential settlement letter.			
01/28/2026	Hourly time entry	Unbilled	Ryan Peterson	Revise confidential settlement conference letter to Magistrate Judge Elkins.	1.2h	\$450.00	\$540.00
02/04/2026	Hourly time entry	Unbilled	Ryan Peterson	Prepare for February 5 settlement conference before Magistrate Judge Elkins.	1.5h	\$450.00	\$675.00
02/05/2026	Hourly time entry	Unbilled	Ryan Peterson	Attend settlement conference before Magistrate Judge Elkins with T. Lyons and N. Hansen (11:00 a.m. to 6:00 p.m.; mediator's proposal issued).	7.0h	\$450.00	\$3,150.00
02/05/2026	Hourly time entry	Unbilled	Ryan Peterson	Round-trip travel between Edina office and Minneapolis federal courthouse for settlement conference.	0.8h	\$450.00	\$360.00
02/06/2026	Hourly time entry	Unbilled	Ryan Peterson	Review Magistrate Judge Elkins' email confirming acceptance of \$195,000 mediator's proposal; email T. Lyons re chambers.	0.2h	\$450.00	\$90.00
03/02/2026	Hourly time entry	Unbilled	Ryan Peterson	Review Defendant's draft class settlement agreement with T. Lyons redlines; add edits, including incentive award terms.	1.2h	\$450.00	\$540.00
03/11/2026	Hourly time entry	Unbilled	Ryan Peterson	Participate in conference call with defense and third-party counsel re settlement agreement redlines, administrator, class data, notices, and preliminary approval hearing.	0.7h	\$450.00	\$315.00
03/24/2026	Hourly time entry	Unbilled	Ryan Peterson	Email N. Hansen requesting his settlement conference notes; review his response re allocation terms.	0.2h	\$450.00	\$90.00
05/06/2026	Hourly time entry	Unbilled	Ryan Peterson	Participate in Zoom meeting with C. Olson and counsel re settlement agreement edits and class data spreadsheet.	0.5h	\$450.00	\$225.00
05/21/2026	Hourly time entry	Unbilled	Ryan Peterson	Audit Renters Warehouse's class member spreadsheet (class members, addresses, and distribution breakdown).	1.5h	\$450.00	\$675.00
06/02/2026	Hourly time entry	Unbilled	Ryan Peterson	Participate in kickoff call with settlement administrator (Continental DataLogix) and counsel.	0.5h	\$450.00	\$225.00
06/03/2026	Hourly time entry	Unbilled	Ryan Peterson	Review C. Olson email re net-negative class member with six-figure charge and administrator's analysis of CAFA notice and pro rata payments.	0.4h	\$450.00	\$180.00

06/04/2026	Hourly time entry	Unbilled	Ryan Peterson	Call with T. Lyons re payment distribution and net-negative subclass; email C. Olson questioning inclusion of net-negative subclass.	0.6h	\$450.00	\$270.00
06/22/2026	Hourly time entry	Unbilled	Ryan Peterson	Call with T. Lyons re C. Olson's objection to excluding net-negative class members.	0.3h	\$450.00	\$135.00
06/23/2026	Hourly time entry	Unbilled	Ryan Peterson	Participate in Teams call with settlement administrator re removing net-negative class members from payments.	0.5h	\$450.00	\$225.00
07/06/2026	Hourly time entry	Unbilled	Ryan Peterson	Review revised settlement agreement with de minimis payment provision; call with T. Lyons.	0.5h	\$450.00	\$225.00
07/29/2026	Hourly time entry	Unbilled	Ryan Peterson	Review and redline memorandum supporting class certification and preliminary approval; add record citations.	2.5h	\$450.00	\$1,125.00
08/03/2026	Hourly time entry	Unbilled	Ryan Peterson	Draft declaration in support of motion for class certification, appointment of class counsel, and preliminary approval (ledger review methodology and Rule 23(g) qualifications); assemble CV and exhibits.	3.0h	\$450.00	\$1,350.00
08/04/2026	Hourly time entry	Unbilled	Ryan Peterson	Revise preliminary approval memorandum (subclass definitions and counts); prepare exhibit index; review administrator's redlined long-form and postcard notices.	1.2h	\$450.00	\$540.00
08/05/2026	Hourly time entry	Unbilled	Ryan Peterson	Revise ledger percentage analysis in preliminary approval memorandum.	0.5h	\$450.00	\$225.00
08/20/2026	Hourly time entry	Unbilled	Ryan Peterson	Attend hearing on motion for preliminary approval before Magistrate Judge Elkins (10:00 to 10:15 a.m.; granted), including travel.	1.1h	\$450.00	\$495.00
08/20/2026	Hourly time entry	Unbilled	Ryan Peterson	Review order granting preliminary approval (ECF 111) and resulting deadlines.	0.3h	\$450.00	\$135.00
09/02/2026	Hourly time entry	Unbilled	Ryan Peterson	Locate and send prior federal fee petition memorandum and declarations to T. Lyons as models; offer supporting declaration.	0.2h	\$450.00	\$90.00
09/24/2026	Hourly time entry	Unbilled	Ryan Peterson	Email T. Lyons re review of draft fee memorandum.	0.1h	\$450.00	\$45.00

Unbilled Total: **146.0 hours, \$67,076.25**

Matter Total: **146.0 hours, \$67,076.25**

Client Total: 146.0 hours, \$67,076.25

Grand Total: 146.0 hours, \$67,076.25