

**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 THOMAS J.
LYONS, JR. IN SUPPORT OF CLASS
COUNSEL'S MOTION FOR AN
AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION
EXPENSES, AND SERVICE AWARDS**

I, Thomas J. Lyons, Jr., make this Declaration in support of Class Counsel's 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 an attorney with Consumer Justice Center, P.A. ("CJC"). I have practiced complex consumer civil litigation for over thirty years. I received my Juris Doctor from the University of

Minnesota Law School in 1994, was admitted to practice in Minnesota in 1994, 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 Carter B. Lyons of CJC and Ryan D. Peterson of Peterson Legal, PLLC. I have been actively involved in this matter from its inception and have personal knowledge of the work performed by CJC.

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

4. Since the inception of this litigation, and in accordance with CJC's normal business practices, CJC has maintained contemporaneous time records reflecting the work performed by its attorneys in this action. I have reviewed those records and believe they accurately reflect the work performed and time reasonably devoted to this matter.

5. This action commenced on July 10, 2024, and it 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, the Court denied the renewed motions 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, CJC's work included reviewing and revising the pleadings; researching and briefing contested motions to dismiss and strike the class allegations; preparing for hearings; drafting and responding to discovery; reviewing extensive document productions; addressing discovery deficiencies; preparing Rule 26 disclosures; communicating with Plaintiffs, co-counsel, opposing counsel, and the Court; preparing class-certification materials; preparing for and participating in settlement discussions; and negotiating and reviewing the Settlement Agreement and related settlement documents.

8. The parties participated in a full-day settlement conference before Magistrate Judge Shannon G. Elkins on February 5, 2026. 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. CJC's contemporaneous billing records through September 24, 2026, reflect a total of 186.64 attorney hours and a lodestar of \$111,271.83. Those records reflect 184.61 hours for my work at an hourly rate of \$600.00, with a billing value of \$110,763.15, and 2.03 hours for Carter B. Lyons at an hourly rate of \$250.00, with a billing value of \$508.68. The hours stated above are the rounded aggregate hours displayed in CJC's billing records. The billing software calculates fees using the underlying individual time entries before those aggregate hours are rounded for display. Accordingly, multiplying the displayed aggregate hours by the applicable hourly rates results in minor variances from the billing values calculated and maintained by the billing software.

12. In addition to attorneys' fees, Consumer Justice Center, P.A. incurred \$527.99 in litigation costs in prosecuting this action. These costs consist of a process-server expense incurred in connection with this litigation. A true and correct copy of CJC's billing records reflecting the fees and costs incurred in this matter is attached hereto as Exhibit A. CJC's records reflect total fees of \$111,271.83 and total costs of \$527.99, for total charges of \$111,799.82.

13. A true and correct copy of CJC's contemporaneous time and billing records is attached as Exhibit A. I have carefully reviewed those records. The work reflected in them was performed for the benefit of Plaintiffs and the Settlement Class, was reasonably necessary to prosecute and resolve this action, and is not duplicative.

14. CJC's current hourly rate for my time is \$600.00. Based upon my experience in consumer-protection and class-action litigation, that rate is reasonable and consistent with rates charged by attorneys of comparable experience for complex consumer litigation in this District. My hourly rate has increased over the years as my experience has increased and has been approved in prior consumer-protection fee petitions.

15. I have been involved in more than 2,000 consumer cases in state and federal courts and have served as class counsel in numerous consumer class actions. Courts in this District have recognized me as a "leading member of the local consumer protection bar" and a leading attorney in consumer protection law with a national practice.

16. 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.

17. 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.

18. CJC is a highly specialized consumer-protection law firm with decades of experience litigating complex consumer cases and class actions. The firm deliberately

focuses its practice on consumer-protection litigation and devotes substantial attorney time and resources to the matters it undertakes. The sustained commitment required by this litigation necessarily precluded CJC from accepting or devoting those resources to other matters. Because the representation was entirely contingent, CJC 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.

19. 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.

20. 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. The Settlement Agreement permits a total service award of up to \$15,000.00, subject to Court approval.

21. Based upon my experience, my involvement in this matter, my review of 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 substantially less than CJC's lodestar alone, before considering the time and lodestar of co-counsel or the additional work required through final approval and settlement administration.

22. 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 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/ Thomas J. Lyons Jr.

Thomas J. Lyons, Jr., Esq.

Attorney I.D. #: 249646

CONSUMER JUSTICE CENTER, P.A.

367 Commerce Court

Vadnais Heights, MN 55127

Telephone: (651) 770-9707

Facsimile: (651) 704-0907

tommy@consumerjusticecenter.com

EXHIBIT A

9/29/2026
9:40 AM

Consumer Justice Center, P.A.
Pre-bill Worksheet

Page 1

Selection Criteria

Slip.Classification	Open
Clie.Selection	Include: Hansen, Nick Class

9/29/2026
9:40 AM

Consumer Justice Center, P.A.
Pre-bill Worksheet

Page 2

Nickname Hansen, Nick Class | 11973
Full Name Nick Hansen Renters Warehouse Class
Address
Phone Fax
Home Other
In Ref To
Fees Arrg. By billing value on each slip
Expense Arrg. By billing value on each slip
Tax Profile Exempt
Last bill
Last charge 9/24/2026
Last payment Amount \$0.00

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/8/2024 1064009	Tommy Lyons File Review File Review and final examination of the class action complaint	600.00	0.74	446.83	Billable
7/30/2024 1064294	Tommy Lyons E-Mail review email from Defendant suggesting motion to dismiss coming and respond with request to meet and confer	600.00	0.35	210.83	Billable
8/1/2024 1064326	Tommy Lyons Motion Practice review and outline response to Defendant's motion to strike class allegations and 12b6	600.00	4.38	2,625.83	Billable
8/2/2024 1064335	Tommy Lyons MOTION STRATEGY drafting email to defendant counsel after discussing plan with Ryan	600.00	1.18	708.83	Billable
8/5/2024 1064363	Tommy Lyons E-Mail with the court to reset hearing date / update client	600.00	0.34	205.33	Billable
8/7/2024 1064399	Tommy Lyons Telephone file review and motion documents and then call with OC about extension and the nature of the claims	600.00	0.99	593.00	Billable
8/7/2024 1064407	Tommy Lyons Drafting drafting stipulation to extend and then send to RP for review	600.00	0.71	425.50	Billable
8/12/2024 1064455	Tommy Lyons Review Review Order extending deadlines & update clients	600.00	0.41	246.17	Billable
9/4/2024 1064757	Tommy Lyons amended complaint drafting revising, editing and drafting amended complaint and discuss with team	600.00	1.20	722.67	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 3

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/5/2024 1064774	Tommy Lyons Review Review order from the courtr	600.00	0.39	236.50	Billable
10/9/2024 1065143	Tommy Lyons Drafting stipulation to extend breifing schedule and then email to OC	600.00	0.56	337.83	Billable
10/10/2024 1065159	Tommy Lyons Review Review Order granting extension on briefing schedule / then woring on motion to strike	600.00	1.64	982.67	Billable
10/21/2024 1065364	Tommy Lyons Motion Practice responding to Defendant's motion to strike class allegations	600.00	2.33	1,396.17	Billable
10/22/2024 1065382	Tommy Lyons Motion Practice drafting response to motion to strike	600.00	2.29	1,374.67	Billable
10/24/2024 1065406	Tommy Lyons Motion Practice final review of the memo and cite check on Motion to Strike	600.00	4.03	2,417.00	Billable
10/30/2024 1065495	Tommy Lyons E-Mail review emails and stipulation on extending deadline and hearing date for Rule 12 motions	600.00	0.40	242.83	Billable
10/30/2024 1065499	Tommy Lyons Review Review order and calednar response	600.00	0.39	236.83	Billable
11/12/2024 1065668	Tommy Lyons E-Mail Call from the court about setting a hearing date for Rule 12 motion. Update client.	600.00	0.37	223.83	Billable
11/14/2024 1065705	Tommy Lyons Motion Practice review and editing the memo in opposition to Defendants Rule 12 motion	600.00	2.90	1,740.83	Billable
12/7/2024 1065954	Tommy Lyons Motion Practice review the reply memo of Defendants	600.00	1.80	1,082.50	Billable
1/2/2025 1066193	Tommy Lyons E-Mail to and from court about the hearing	600.00	0.38	225.67	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 4

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/27/2025 1066473	Tommy Lyons Hearing Prep REVIEW FILE AND MOTION PAPERS AND THEN CALL RP FOR outline of argument for hearing	600.00	2.00	1,197.83	Billable
1/28/2025 1066488	Tommy Lyons E-Mail review emails from OC about wrong lease submitted to court for argument...then supplemental declaration filed and reviewed. then post hearing call with RP + update to clients	600.00	1.00	600.00	Billable
2/6/2025 1066613	Tommy Lyons E-Mail to and from OC about extension and then also trying to set the Rule 26f + update clients	600.00	0.56	336.33	Billable
2/7/2025 1066637	Tommy Lyons Review Review stipulation and then respond to OC	600.00	0.35	209.00	Billable
2/10/2025 1066663	Tommy Lyons Review Review order from court to answer by 2/25/25 - update clients	600.00	0.32	192.00	Billable
2/25/2025 1066867	Tommy Lyons Review Review Answer of Defndant	600.00	1.07	640.50	Billable
2/25/2025 1066869	Tommy Lyons Review Review Defendant 3rd party complaint and exhibits and then discuss next steps with team	600.00	2.89	1,735.33	Billable
3/7/2025 1066957	Tommy Lyons Review Review date for Zelda to answer and also email from OC about Rule 26f conference	600.00	0.29	173.50	Billable
3/10/2025 1066973	Tommy Lyons Review Review answer of 3rd party defendant and then foward 26f report to new 3rd party counsel for review and redlines	600.00	1.16	697.17	Billable
3/11/2025 1066982	Tommy Lyons Review Review pretrial order and then set call with 3rd party counsel for later this week.	600.00	0.42	254.50	Billable
3/14/2025 1067021	Tommy Lyons Telephone prepare for and then call with third party defendants counsel	600.00	1.02	613.00	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 5

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/1/2025 1067221	Tommy Lyons Rule 26(f) review defendants edit to report then agree to them and pass on to Joel....for his edits	600.00	0.42	251.33	Billable
4/7/2025 1067256	Tommy Lyons Rule 26(f) review 3rd party defendants redlines to report and respond	600.00	0.43	256.17	Billable
4/8/2025 1067277	Carter drafting discovery	250.00	1.37	342.01	Billable
4/8/2025 1067283	Carter drafting discovery	250.00	0.67	166.67	Billable
4/11/2025 1067320	Tommy Lyons Rule 26(f) review email and redlines and then call with OC	600.00	0.56	336.67	Billable
4/14/2025 1067343	Tommy Lyons Drafting letter to Magistrate on settlement conference timing / then email to RP and outline tasks for discovery and ask him to review our set	600.00	0.46	278.17	Billable
4/15/2025 1067361	Tommy Lyons Review Review RP edits and then give Andi ok to serve	600.00	0.46	273.50	Billable
4/22/2025 1067409	Tommy Lyons Rule 16 prepare for and call with RP before getting on call with Magistrate	600.00	0.94	564.67	Billable
4/23/2025 1067433	Tommy Lyons Rule 26(a)(1) file review and drafting initial disclosures / then send to RP for review and edits	600.00	1.33	796.67	Billable
4/24/2025 1067445	Tommy Lyons Review Review discovery to 3rd party D	600.00	0.48	289.00	Billable
4/25/2025 1067457	Tommy Lyons Review Review Scheduling order issued by Mag / update clients	600.00	0.30	178.33	Billable
4/30/2025 1067477	Tommy Lyons Rule 26(a)(1) drafting and editing PLaintiff's intiiial disclosures and review and bates documents to be produced	600.00	1.08	647.50	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 6

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/1/2025 1067494	Tommy Lyons Rule 26(a)(1) review RW initial disclosures and investigate the names of the witnesses ID by defendant	600.00	1.13	676.17	Billable
5/1/2025 1067495	Tommy Lyons Rule 26(a)(1) review Yelda initial disclosures	600.00	0.38	225.67	Billable
5/16/2025 1067671	Tommy Lyons Discovery review RW discovery responses / then note taking concerning which ones are deficient and need supplementation	600.00	2.27	1,364.67	Billable
5/16/2025 1067680	Tommy Lyons Drafting DRAFTING PO and send to client	600.00	0.49	296.50	Billable
5/20/2025 1067714	Tommy Lyons Strategy call with RP and then task email to OC about protective order, production of the documents and review of the discovery deficiencies	600.00	1.44	863.83	Billable
5/27/2025 1067782	Tommy Lyons Discovery review Defendant Yelda responses	600.00	1.25	751.33	Billable
5/29/2025 1067819	Tommy Lyons Review Review RW documents 001-203 / making notes and then outlining deficiencies	600.00	2.83	1,698.67	Billable
6/6/2025 1067943	Tommy Lyons Discovery review discovery from RW to Plaintiff and 3rd party defendant / discuss with team and task appropriately	600.00	1.28	767.00	Billable
6/12/2025 1067988	Tommy Lyons Review Review 3rd party defendants documents 001-158 and then call to ryan to discuss	600.00	2.39	1,431.50	Billable
6/30/2025 1068161	Tommy Lyons Rule 37.1 review file and then email to OC for RH about meet and confer to go over discovery targeting class size that were unanswered	600.00	0.90	540.33	Billable
7/8/2025 1068219	Tommy Lyons STATUS LETTER file review and drafting status letter	600.00	0.89	533.83	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 7

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/10/2025 1068248	Tommy Lyons Discovery review Yelda discovery responses and then email to all counsel about the meet and confer required by pretrial order	600.00	1.44	865.67	Billable
7/10/2025 1068252	Tommy Lyons DISCOVERY FOLLOW UP call with RW counsel and then also meet and confer re settlement	600.00	0.51	306.33	Billable
7/14/2025 1068258	Tommy Lyons Discovery editing and revising client's responses to Defendant's discovery and put into proper form & review documents to be produced	600.00	1.39	831.50	Billable
7/14/2025 1068259	Tommy Lyons Discovery drafting class discovery to RW	600.00	1.18	709.00	Billable
7/16/2025 1068294	Tommy Lyons Discovery review Yedlas amended RFAs	600.00	0.29	176.17	Billable
7/31/2025 1068478	Tommy Lyons Review Review final version of Proposed Amended Complaint and then discuss with RP about sending to Defendants with stip or else proceed by motion practice	600.00	0.61	365.33	Billable
8/1/2025 1068500	Tommy Lyons Motion Practice review and revising motion to amend the complaint	600.00	0.61	368.17	Billable
8/4/2025 1068526	Tommy Lyons E-Mail review request for extension to respond to motion to amend complaint by RW...talk to team and give ok	600.00	0.35	208.50	Billable
8/18/2025 1068657	Tommy Lyons Motion Practice review Defendants opposition to Rule 15 motion	600.00	3.62	2,173.83	Billable
8/19/2025 1068673	Tommy Lyons Review Review 3RD Party defendants response to rule 15 memo & then email to OC	600.00	0.36	216.83	Billable
8/21/2025 1068718	Tommy Lyons Discovery review RPDS #2 from RW / then email to Defendant for LR 37.1	600.00	0.76	453.00	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 8

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/28/2025 1068799	Tommy Lyons Rule 37.1 prepare for and participate in conference with OC about 2nd set RPDs	600.00	0.65	389.17	Billable
9/3/2025 1068874	Tommy Lyons E-Mail review update from Defendant RW counsel and discuss with team	600.00	0.34	203.00	Billable
9/5/2025 1068910	Tommy Lyons DISCOVERY FOLLOW UP review emails from OC about RW class document production / then email to co-counsel about next steps	600.00	0.95	567.83	Billable
9/8/2025 1068920	Tommy Lyons Strategy call with RP about Defendant RW proposal on document production for class / then begin to draft response to RL email	600.00	0.79	471.00	Billable
9/22/2025 1069112	Tommy Lyons Review Review Defendant's letter to KMM regarding early SJ motion and discuss with team	600.00	0.41	246.00	Billable
9/25/2025 1069150	Tommy Lyons Strategy File Review and then strategy session wwith team and call to 3rd party counsel + discussing the early Sj and depo next week	600.00	1.42	849.83	Billable
9/25/2025 1069152	Tommy Lyons Discovery review new RW documents 240-741	600.00	4.25	2,550.83	Billable
9/28/2025 1069167	Tommy Lyons Review Review letter request to KMM to file early SJ	600.00	0.28	168.00	Billable
9/29/2025 1069175	Tommy Lyons Drafting letter to KMM about PLaintiff's objection to the parties SJ motions before discovery ends	600.00	0.94	564.33	Billable
10/1/2025 1069224	Tommy Lyons DEPOSTION POST MORTEM call with RP about next steps and listening	600.00	0.47	279.67	Billable
10/2/2025 1069236	Tommy Lyons Motion Practice revising and editing the supplemental letter to court regarding Plaintiff's objection to early SJ	600.00	0.29	175.67	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 9

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/2/2025 1069238	Tommy Lyons STATUS LETTER drafting letter to MAG about current discovery disputes and also class cert deadline extension	600.00	0.52	309.50	Billable
10/2/2025 1069245	Tommy Lyons Review Review Order denying early sj and then discuss with team and clients next steps	600.00	0.55	330.00	Billable
10/7/2025 1069312	Tommy Lyons Discovery review the 6500 pages of documents produced / then email to Defendant to extend class cert by 60 days	600.00	5.22	3,134.33	Billable
10/14/2025 1069370	Tommy Lyons RULE 7.1 MEETING prepare for (and call with co-counsel) and participate in call with all counsel about class cert deadline motion and also property owners disclosures and PFD instead of TIFFs	600.00	1.23	739.83	Billable
10/17/2025 1069436	Tommy Lyons Discovery review of Defendants production of PDFs and then call with team to discuss and task next steps / finally review email from OC predicting the discovery disputes/IDR	600.00	6.28	3,767.00	Billable
10/23/2025 1069492	Tommy Lyons Motion Practice drafting motion to amend scheduling order - class cert deadline	600.00	4.49	2,695.17	Billable
10/27/2025 1069542	Tommy Lyons Motion Practice review RP edits and then reach out to Joel about whether his client will join or oppose amendment	600.00	0.46	277.67	Billable
11/3/2025 1069636	Tommy Lyons Strategy call with RP to discuss documents produced	600.00	0.47	282.83	Billable
11/8/2025 1069703	Tommy Lyons Motion Practice reviewing defendants responsive memo	600.00	4.31	2,584.67	Billable
11/21/2025 1069871	Tommy Lyons Strategy call with RP about hearing next week and then what his review of the documents compared to mine has found / discuss need for depo before class cert	600.00	1.16	695.00	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 10

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/26/2025 1069928	Tommy Lyons Motion Practice prepare and then participating in hearing	600.00	1.09	655.00	Billable
12/11/2025 1070098	Tommy Lyons Strategy telephone with RP and then review his email to OC and the response from RW	600.00	0.62	374.17	Billable
12/12/2025 1070120	Tommy Lyons Review Review response from Defendant about refusing to stipulate to make certain commonality arguments in opposition to class cert....then review the subpoena served on former employee	600.00	1.00	602.83	Billable
12/16/2025 1070172	Tommy Lyons Telephone call with Cory Olson about exploring settlement / then update to Ryan P	600.00	0.61	363.33	Billable
12/30/2025 1070266	Tommy Lyons Telephone prepare for and participate in call with OC about exploration of settlement	600.00	1.05	631.50	Billable
1/7/2026 1070319	Tommy Lyons Motion Practice drafting class action motion	600.00	3.19	1,914.83	Billable
1/8/2026 1070338	Tommy Lyons Telephone negotiations with OC about class wide damages and potential settlement conference + then call with clients to get authority to proceed with settlement conference	600.00	1.00	602.83	Billable
1/8/2026 1070339	Tommy Lyons E-Mail drafting email to Magistrate Judge seeking settlement conference /	600.00	0.36	215.17	Billable
1/8/2026 1070340	Tommy Lyons Motion Practice drafting class cert motion, client declarations and also counsel declarations	600.00	3.04	1,821.17	Billable
1/8/2026 1070348	Tommy Lyons Review Review edit to email from OC to Magistrate and reviewing the joint motion, then edit and resend to all counsel	600.00	0.49	292.50	Billable
1/9/2026 1070351	Tommy Lyons E-Mail corrordinating with court and counsel for 2/2 settlement conference with SGE	600.00	0.53	317.17	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 11

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/9/2026 1070356	Tommy Lyons Motion Practice finish drafting class cert motion since there is no order yet agreeing to stay the case/extend briefing schedule	600.00	1.12	672.83	Billable
1/14/2026 1070411	Tommy Lyons Review emails to and from Court about settlement confernece and then Review order from COurt setting date for 2/5, then setting time for preparation with clients for next week	600.00	0.55	327.67	Billable
1/16/2026 1070435	Tommy Lyons Review Review order on class cert briefing and then set time to talk to clients	600.00	0.36	216.50	Billable
1/21/2026 1070483	Tommy Lyons E-Mail to and from OC about ledger damage spreadsheet evidence and then call with client about Settlement confernece logistics	600.00	0.54	322.17	Billable
1/22/2026 1070490	Tommy Lyons E-Mail to and from opposing counsel concerning meet and confer set up to comply with judges order	600.00	0.28	170.67	Billable
1/22/2026 1070494	Tommy Lyons Demand Prep file review and then outline class demand to send to RP and clients for review before conveying to OC	600.00	1.17	700.67	Billable
1/22/2026 1070505	Tommy Lyons Negotiations discuss demand and logistics of settlement conference with client and team and then foward structure terms to OC	600.00	0.48	286.17	Billable
1/23/2026 1070514	Tommy Lyons E-Mail to and from OC about settlement meet and confer as well as demand.	600.00	0.45	268.67	Billable
1/26/2026 1070536	Tommy Lyons meet and confer call with RP about his deep dive and spreadsheet production of damage analysis, then participate in call with all counsel in accordance with the Magistrates order for settlement conference	600.00	0.97	583.50	Billable
1/26/2026 1070548	Tommy Lyons Demand Prep review RP detailed spreadsheet and then drafting global settlement demand to OC	600.00	2.36	1,418.00	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 12

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/27/2026 1070559	Tommy Lyons Review Review Defendant's settlement spread sheet	600.00	3.04	1,822.00	Billable
1/28/2026 1070564	Tommy Lyons Review Review OC remarks to our demand/data, then set time to discuss with team/RP	600.00	1.00	598.50	Billable
1/28/2026 1070571	Tommy Lyons E-Mail request to Court to have only one plaintiff participate	600.00	0.38	229.33	Billable
1/29/2026 1070583	Tommy Lyons Rule 16 settlement conf file reivew and then drafting, editing and revising settlement conference letter to mag	600.00	2.68	1,609.17	Billable
1/30/2026 1070596	Tommy Lyons Negotiations prepare for and participate in call with OC about terms of settlement and framework	600.00	2.12	1,270.83	Billable
2/4/2026 1070640	Tommy Lyons Telephone call with OC before mediation tomorrow / then Preparation for mediation / settlement conference	600.00	3.22	1,930.50	Billable
2/5/2026 1070642	Tommy Lyons Rule 16 settlement conf participate in conference with client, RP and SGE	600.00	6.09	3,656.50	Billable
2/6/2026 1070656	Tommy Lyons E-Mail review emails from court on settlement reached after submitting our acceptance.	600.00	0.39	233.17	Billable
2/12/2026 1070725	Tommy Lyons E-Mail to and from OC about time for settlement agreement and then need to review leases / then try and find settlement administrator for least expensive amount	600.00	0.84	502.83	Billable
2/26/2026 1070853	Tommy Lyons settlement agreement review and editing and redlining draft agreement and send to RP for review before sending to OC / sending class notice drafts to OC too	600.00	3.09	1,855.67	Billable
3/2/2026 1070874	Tommy Lyons Review Review order appointing SGE + update client and then check in with RP	600.00	0.40	240.67	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 13

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/2/2026 1070884	Tommy Lyons settlement agreement review RP edits and then forward to OC	600.00	0.72	431.67	Billable
3/5/2026 1070926	Tommy Lyons Review Review Cory letter to Mag about dismissal of case	600.00	0.23	140.50	Billable
3/11/2026 1070980	Tommy Lyons Meeting Meeting with OC about status of settlement agreement , then update everyone on my researh on class administrators, then review order from Court giving until 5/30 to set hearing date	600.00	1.55	932.00	Billable
5/6/2026 1071479	Tommy Lyons Conference review spreadsheet and other information from OC and then Conference with OC about class data and spreadsheet plus edits to the settlement agreement	600.00	4.29	2,574.00	Billable
5/19/2026 1071602	Tommy Lyons Review Review Class administration bid from Continental Data Logic and compare to the one OC received	600.00	1.13	677.00	Billable
5/21/2026 1071619	Tommy Lyons settlement agreement final edits to settlement agreement and then instruct andi to get hearing date and then back agreement with redlines to OC	600.00	0.61	366.00	Billable
5/21/2026 1071621	Tommy Lyons Drafting and editing the long form and short form notices	600.00	0.63	375.33	Billable
5/26/2026 1071644	Tommy Lyons Telephone call with OC and then Court to get final approval date nailed donw...then agree that OC will send us final documents and I will forward to Class admin to get all on same page	600.00	0.57	341.50	Billable
6/2/2026 1071711	Tommy Lyons Telephone call with class administrator	600.00	0.76	456.83	Billable
6/5/2026 1071751	Tommy Lyons Review Review edits by Yeldas counsel and then call with RP to discuss limiting class size due to deminimus results if we include net negative folks	600.00	0.79	475.00	Billable
6/17/2026 1071865	Tommy Lyons settlement agreement review email from OC about final version of SA / then follow up with Cory	600.00	0.34	206.50	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 14

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	about deminimus recocery and excluding that part of the putative class from settlement				
6/22/2026 1071907	Tommy Lyons Telephone with RP and then responsive email to Cory about class size and net negative folks being limited/ then similar email to class administrator	600.00	0.55	328.00	Billable
6/23/2026 1071923	Tommy Lyons Telephone call with class administrator to talk about impact of remove of some of net negative class members / then follow up with Cory	600.00	0.58	346.83	Billable
7/6/2026 1072065	Tommy Lyons Research Research into the de minimis settlement amounts / Sullivan v. DB Investments (3rd cir) / then discuss with RP and respond to OC with his edits to settlement agreement + update to class administrator with new agreement and then make request for updated class totals	600.00	0.71	428.67	Billable
7/6/2026 1072076	Tommy Lyons Review engagement agreeement with class administrator / sign and return	600.00	0.50	301.67	Billable
7/15/2026 1072852	Tommy Lyons Motion Practice Review, draft, edit Motion for Preliminary Approval	600.00	3.25	1,950.00	Billable
7/30/2026 1072296	Tommy Lyons Motion Practice editing and reviewing RP edits to memo to seek preliminary approval	600.00	3.97	2,380.83	Billable
8/5/2026 1072336	Tommy Lyons Motion Practice final drafting, editng, and revising of memo and declarations / then review comments from opposing counsel re notices	600.00	2.57	1,543.83	Billable
8/11/2026 1072363	Tommy Lyons Review Review CAFA letter proposal and give ok	600.00	0.36	213.83	Billable
8/15/2026 1072441	Tommy Lyons E-Mail from administrator about CAfA going out	600.00	0.36	218.00	Billable
8/20/2026 1072502	Tommy Lyons Hearing Court Appearance for Hearing in MPLS	600.00	1.06	637.33	Billable

9/29/2026
9:40 AMConsumer Justice Center, P.A.
Pre-bill Worksheet

Page 15

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/20/2026 1072509	Tommy Lyons Telephone call with the administrator following the hearing and order on timing and next steps	600.00	0.60	361.83	Billable
8/24/2026 1072552	Tommy Lyons Review Review Order then send to administrator / then answer questions related to the notices they needed to clarify language	600.00	0.41	245.17	Billable
8/27/2026 1072597	Tommy Lyons Review Review final edits to class notice and then give ok	600.00	0.76	454.50	Billable
9/2/2026 1072645	Tommy Lyons Review Review website and then give OK to class administrator / then send to client to for review	600.00	1.30	782.83	Billable
9/17/2026 1072798	Tommy Lyons Motion Practice drafting motion for attorney fee/costs, then send to Ryan for review	600.00	3.08	1,847.83	Billable
9/24/2026 1072849	Tommy Lyons Review Review timeslips and attorney fees in preparation for submission to court, editing and revising attorney fee motion	600.00	1.22	730.50	Billable
TOTAL	Billable Fees		186.64		<u>\$111,271.83</u>

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
7/10/2024 1072879	Tommy Lyons Filing Fee	405.00	1.000	405.00	Billable
7/16/2024 1072857	Tommy Lyons APS Process Server	122.99	1.000	122.99	Billable
TOTAL	Billable Costs				<u>\$527.99</u>

9/29/2026
9:40 AM

Consumer Justice Center, P.A.
Pre-bill Worksheet

Page 16

Hansen, Nick Class:Nick Hansen Renters Warehouse Class (continued)

Calculation of Fees and Costs

	Amount	Total
Fees Bill Arrangement: Slips By billing value on each slip.		
Total of billable time slips	\$111,271.83	
Total of Fees (Time Charges)		\$111,271.83
Costs Bill Arrangement: Slips By billing value on each slip.		
Total of billable expense slips	\$527.99	
Total of Costs (Expense Charges)		\$527.99
Total new charges		\$111,799.82
New Balance Current	\$111,799.82	
Total New Balance		\$111,799.82

Timekeeper Summary

Timekeeper	Rate	Hours	Charges	Slip Value	Adjustment
CL	250.00	2.04	\$508.68	\$508.68	0.00
TJR	600.00	184.58	\$110,763.15	\$110,763.15	0.00