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8 Attorneys for Plaintiff,  
9 JOHN UTNE

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 JOHN UTNE, on behalf of himself, all others  
13 similarly situated, and the general public,  
14 Plaintiff,

15 vs.

16 HOME DEPOT U.S.A., INC., a Delaware  
17 corporation; and DOES 1-50, inclusive,  
18 Defendants.

Case No. 3:16-CV-01854-RS

**DECLARATION OF SHAUN  
SETAREH IN SUPPORT OF MOTION  
FOR ATTORNEYS' FEES,  
LITIGATION EXPENSES, AND  
CLASS REPRESENTATIVE SERVICE  
AWARDS**

Date: February 15, 2024

Time: 1:30pm

Place: Courtroom 3, 17<sup>th</sup> Floor

1 **DECLARATION OF SHAUN SETAREH**

2 I, Shaun Setareh, do hereby declare and state:

3 1. I am an attorney, duly licensed to practice law before this Court. The facts stated  
4 herein are of my own personal knowledge.

5 **HISTORY OF THE LITIGATION**

6 **1) The Pleadings.**

7 2. Plaintiff John Utne commenced this action against defendant Home Depot  
8 U.S.A., Inc. on March 8, 2016, in the Superior Court of California, County of Alameda. Dkt. 1-1,  
9 ¶ 2, Ex. A. On April 7, 2016, Home Depot filed its Answer to Plaintiff’s original complaint. .  
10 Dkt. 1-1, ¶ 3, Ex. B. Plaintiff then filed his First Amended Complaint (“1AC”) in the Alameda  
11 County Superior Court to add a cause of action for civil penalties pursuant to California’s Public  
12 Attorneys General Act (“PAGA”). Dkt. 1-1, ¶ 4, Ex. C.

13 3. On April 8, 2016, Home Depot filed a Class Action Notice of Removal, removing  
14 this case to the United States District Court for the Northern District of California, where it has  
15 remained ever since. Dkt. 1.

16 4. Home Depot filed its Answer to the 1AC on April 25, 2016. Dkt. 14.

17 5. On November 30, 2016, Plaintiff filed a motion for leave to file a Second  
18 Amended Complaint (“2AC”) to add additional claims based on allegations of unfair rounding  
19 practices, which this Court granted on December 15, 2016. Dkt. 28 & 29. On December 29,  
20 2016, Home Depot filed its Answer to Plaintiff’s 2AC. Dkt. 30.

21 6. On August 16, 2017, Plaintiff filed a motion for leave to file a Third Amended  
22 Complaint (“3AC”) to assert causes of action based on Home Depot’s alleged policy and practice  
23 of requiring off-the-clock activity before its employees clock-in for their shifts. Dkt. 50. Plaintiff  
24 also filed a motion to shorten time for the hearing on the motion. Dkt. 51. The Court ordered the  
25 parties to meet-and-confer over the issue, which resulted in the parties stipulating to Plaintiff  
26 filing his 3AC. Dkt. 54. Home Depot filed its Answer to the 3AC on September 12, 2017. Dkt.

1 55.

2 7. On March 31, 2022, Plaintiff sought leave to file a Fourth Amended Complaint  
3 (“4AC”) to address a prior order dismissing Plaintiff’s PAGA claim. Dkt. 237. On April 14,  
4 2022, Home Depot filed its opposition to Plaintiff’s motion for leave to file a 4AC, and on April  
5 21, 2022, Plaintiff filed his reply brief. Dkt. 250 & 258. The Court granted Plaintiff’s motion,  
6 and on May 9, 2022, Plaintiff filed his 4AC. Dkt. 273, at 5:8-7:24; Dkt. 276.

7 8. On June 21, 2022, Plaintiff filed a motion for leave to file a Fifth Amended  
8 Complaint (“5AC”) to address two discreet issues: (1) Home Depot challenged Plaintiff’s  
9 standing to pursue Labor Code section 203 claims because he was a current employee when he  
10 initiated this lawsuit, and (2) Plaintiff’s health was failing, and Plaintiff sought to add a  
11 “back-up” representative plaintiff in case he was unable to appear at trial. Dkt. 287. On July 5,  
12 2022, Home Depot filed its opposition to Plaintiff’s motion for leave to file a 5AC, and on July  
13 12, 2022, Plaintiff submitted his reply brief and supporting documents. Dkt. 293 & 295. On July  
14 26, 2022, the Court granted Plaintiff’s motion for leave to amend his complaint, and ordered  
15 Plaintiff to file a motion seeking appointment as a class representative pursuant to Federal Rule  
16 of Civil Procedure 23(a)(3)&(4). Dkt. 308, at 10:8-17.

17 9. On August 2, 2022, Plaintiff filed a motion to appoint lead plaintiff, along with  
18 the necessary declarations and exhibits. Dkt. 310. On September 12, 2022, Home Depot filed a  
19 statement of non-opposition to the motion to appoint Mr. Pinto as a class representative, and on  
20 September 13, 2022, the Court granted the motion, and appointed Mr. Pinto as a representative  
21 plaintiff. Dkt. 333 & 334.

## 22 **2) Written Discovery**

23 10. On October 31, 2016, Plaintiff propounded his first set of Interrogatories with one  
24 interrogatory seeking class member contact information.

25 11. Also on October 31, 2016, Plaintiff propounded his second set of Interrogatories  
26 with 23 interrogatories seeking Home Depot’s payroll systems, time records, Home Depot’s  
policies regarding closing shifts and information on Home Depot’s defenses on the merits and to

1 class certification.

2 12. Also on October 31, 2016, Plaintiff propounded his first set of Requests for  
3 Production with 36 requests seeking documents including time and pay records, the relevant  
4 written policies and video from Home Depot's surveillance systems showing exits on closing  
5 shifts.

6 13. Also on October 31, 2016, Plaintiff propounded his first set of Requests for  
7 Admission.

8 14. In June of 2017, pursuant to an agreement between the parties, third party  
9 Administrator CPT Group Inc. sent an opt out notice to 5000 randomly selected Home Depot  
10 employees advising them that their contact information would be disclosed to Class Counsel if  
11 they did not opt out. As a result, Plaintiff received a class list with contact information for  
12 thousands employees.

13 15. On January 4, 2019, Plaintiff propounded his third set of Interrogatories, which  
14 contained one interrogatory seeking the start and end times of each store in California.

15 16. On April 22, 2019, Plaintiff propounded his second set of Requests for  
16 Production which sought timekeeping and payroll data for the certified class.

17 17. On May 15, 2019, Plaintiff propounded his third set of Requests for Production  
18 which sought maps showing the layout of all California stores.

19 18. Throughout the litigation Home Depot produced more than 20,000 pages of  
20 documents along with voluminous electronic data.

### 21 **3) Non-Expert Depositions**

22 19. On July 18, 2017, I flew to Atlanta Georgia and took the depositions of Home  
23 Depot's Rule 30(b)(6) designees Barbara Pennington and Christine Barnaby.

24 20. On December 13, 2018, I defended the deposition of class representative John  
25 Utne in San Francisco, California.

26 21. On January 4, 2019, I defended the deposition of class member Rafael Calderon  
in Los Angeles, California.

1           22.     On January 7, 2019, I defended the deposition of class member Jacob Hackelton  
2 in San Francisco, California.

3           23.     On January 8, 2019, I defended the deposition of class member Sherida Stith in  
4 San Francisco, California.

5           24.     On January 9, 2019, I defended the deposition of class member Heather Wood in  
6 San Francisco, California.

7           25.     On January 14, 2019, I defended the deposition of class member Victor Andia in  
8 Los Angeles, California.

9           26.     On January 14, 2019, attorney William Pao of Setareh Law Group defended the  
10 deposition of class member Bernado Alvarez in Los Angeles, California.

11           27.     On January 21, 2019, attorney Scott Leviant then of Setareh Law Group defended  
12 the depositions of class members Darin Patrick Lee and Sally Lou Stein in Los Angeles  
13 California.

14           28.     On January 22, 2019, I defended the deposition of class member Zachary Hill in  
15 Los Angeles, California.

16           29.     On January 24, 2019, I defended the deposition of class member James Wright in  
17 San Francisco, California.

18           30.     On January 31, 2019, I defended the deposition of class member Kevin Darish in  
19 Los Angeles, California.

20           31.     On February 1, 2019, attorney William Pao defended the deposition of class  
21 member Evan Robert Daniel remotely.

22           32.     On February 10, 2019, attorney William Pao defended the deposition of class  
23 member Emanuel Malone remotely.

24           33.     On February 14, 2019, I defended the deposition of class member Cindy Partida  
25 remotely.

26           34.     On February 15, 2019, attorney William Pao defended the deposition of class  
member Craig Anderson remotely.

1           35.     On February 19, 2019, attorney William Pao defended the deposition of class  
2 member Martin Choy remotely.

3           36.     On February 20, 2019, attorney William Pao defended the deposition of class  
4 member Pedro Andrade remotely.

5           37.     On February 20, 2019, attorney Farrah Grant of Setareh Law Group defended the  
6 deposition of class member Allen Hedger remotely.

7           38.     On February 21, 2019, attorney Farrah Grant defended the deposition of class  
8 members Alyssa Camacho and Gerardo Duran remotely.

9           39.     On February 22, 2019, attorney William Pao defended the deposition of class  
10 member Kyle Angel remotely.

11          40.     On February 22, 2019, attorney William Pao defended the deposition of class  
12 member Daniel Chong remotely.

13          41.     On February 25, 2019, attorney William Pao defended the deposition of class  
14 member Kyle Steevens remotely.

15          42.     On February 26, 2019, attorney William Pao defended the deposition of class  
16 member James Gillespie remotely.

17          43.     On February 26, 2019, attorney Thomas Segal defended the deposition of class  
18 member Steven Jacob Henley remotely.

19          44.     On August 31, 2022, I defended the deposition of class representative Albert  
20 Pinto remotely.

21           **4)     Expert Depositions.**

22          45.     On January 18, 2022, I took the deposition of expert Timothy Trujillo remotely.

23          46.     On January 19, 2022, I took the deposition of expert Stephen Smith remotely.

24          47.     On January 20, 2022, attorney Karen Gold then of Marlin & Saltzman LLP  
25 defended the deposition of expert Gary White remotely.

26          48.     On January 20, 2022, attorney Thomas Segal defended the deposition of expert  
James Toney remotely.

1 49. On January 21, 2022 attorney Karen Gold defended the deposition of expert Brian  
2 Kriegler remotely.

3 50. On January 26, 2022, attorney Thomas Segal took the deposition of expert George  
4 Edward Anderson remotely.

5 51. On February 2, 2022, I defended the deposition of Dr. Jon Krosnick.

6 52. On February 4, 2022, attorney Thomas Segal took the deposition of expert Robert  
7 Crandall remotely.

8 53. On August 22, 2023, attorney Karen Gold took a second deposition of Mr.  
9 Crandall as ordered by the Court.

10 **5) Discovery Disputes**

11 **a. Dispute Regarding Video Surveillance Evidence.**

12 54. On December 14, 2019, the parties submitted a Joint Letter Brief Regarding  
13 Discovery Disputes to the Magistrate Judge in which Plaintiff sought to exclude Home Depot's  
14 video study because Home Depot had refused to preserve or produce video surveillance from its  
15 stores . Dkt. 159. On December 6, 2019, Magistrate Judge Kim issued a recommendation that  
16 the study not be excluded, but that the Court issue an adverse jury instruction against Home  
17 Depot in connection with its video study. Dkt. 160.

18 55. On December 20, 2019, Home Depot filed a motion for relief from Magistrate  
19 Judge Kim's order. Dkt 162. Plaintiff also filed an objection, seeking either preclusion of the  
20 study or a more robust adverse inference jury instruction. Dkt. 161.

21 56. On January 14, 2020, the Court overruled the parties objections, but noted that the  
22 Court had discretion over what the adverse jury instruction would say. Dkt. 171.

23 **b. Dispute Regarding Pilot Study.**

24 57. On April 4, 2022, Plaintiff filed a motion seeking terminating sanctions based on  
25 misstatements by Home Depot's former counsel regarding the existence of a pilot study  
26 conducted by expert Robert Crandall which preceded his disclosed video study. Dkt. 244.

58. Magistrate Judge Kim held a hearing on the motion on May 2, 2022. Dkt. 263.

1 On May 9, 2022, Magistrate Judge Kim issued an Order denying terminating sanctions, ordering  
2 Home Depot to produce the Pilot Study and related documents and data, reopened Mr. Crandall's  
3 deposition, and awarded attorney fees and costs to Plaintiff. Dkt 275.

4 c. Dispute Regarding Production of Identity of Survey Respondents.

5 59. On December 12, 2019, the parties submitted a Joint Letter brief to the Magistrate  
6 Judge in which Home Depot sought the identity of class members who responded to Plaintiff's  
7 expert survey. Dkt. 161. Magistrate Judge Kim recommended ordering production of the  
8 subject to protections being put in place. Dkt. 165. Plaintiff objected to the recommendation and  
9 on January 14, 2020, the Court affirmed the order. Dkt. 172.

10 6. **Time and Pay Records Collection and Analysis.**

11 60. The original production of class timekeeping and payroll data occurred in October  
12 2018.

13 61. Plaintiff's expert Dr. Jon Krosnick in analyzing the data identified various  
14 omissions and anomalies in the data which resulted in supplemental productions in November  
15 2018, August 2019, September 2019, March 2020, June 2020, October 2020, December 2020,  
16 February 2021, October 2021, and November 2021.

17 62. In addition to the disclosed experts in the case, Class Counsel retained a  
18 Kronos consultant to advise on the issues related to timekeeping and payroll data, Veronica  
19 McDaniels.

20 7. **Motion for Class Certification, Class Notice, and Motion for Decertification.**

21 63. Prior to filing the motion for class certification, Class Counsel interviewed 64  
22 Home Depot employees about their experiences related to the claims in this case.

23 64. On November 14, 2017, Plaintiff Utne filed his motion for class certification. Dkt.  
24 70-72. The motion was supported by 67 declarations from putative class members (47 obtained  
25 by Plaintiff and 20 obtained by Home Depot and produced in discovery), as well as an  
26 expert declaration and declarations from counsel. *Id.*

65. Home Depot opposed the motion on January 9, 2019. Dkt. 76-80. Plaintiff filed a



1 Reply brief on February 8, 2018. Dkt. No. 86.

2 66. On March 30, 2018, the Court issued its order granting Plaintiff's Motion for  
3 Class Certification, in which it certified two classes: (1) the "Lock-In Class," consisting of "[a]ll  
4 individuals employed by Home Depot in hourly-paid or non-exempt positions in Home Depot  
5 stores in California at any time since March 8, 2012, and who worked at least one shift ending  
6 after the time that the Home Depot store was scheduled to close to the public for the evening";  
7 and (2) the "Hourly Employee Class," consisting of "[a]ll individuals employed by Home Depot  
8 in hourly-paid or non-exempt positions in California at any time since March 8, 2012." Dkt. 92.

9 67. On April 13, 2018, Home Depot filed a Petition for Permission to Appeal the  
10 Court's Order with the Ninth Circuit.

11 68. On April 20, 2018, Plaintiff filed an Opposition to the Petition for Permission  
12 To Appeal.

13 69. On April 27, 2019, Home Depot filed a Reply brief in support of the Petition.

14 70. On June 28, 2018, the Ninth Circuit issued an Order denying the Petition.

15 71. On April 19, 2018, Plaintiff filed a motion to approve class notice. Dkt. 93.

16 72. On May 3, 2018, Home Depot filed its opposition to the motion. Dkt. 93.

17 73. On May 8, 2018, Plaintiff filed a reply in support of the motion. Dkt. 95.

18 74. On May 11, 2018, the Court issued an Order denying the motion pending a  
19 decision on Home Depot's Petition for Permission to Appeal.

20 75. On July 12, 2018, Plaintiff filed a renewed motion to approve class notice. Dkt.  
21 100.

22 76. On July 26, 2018, Home Depot opposed the motion. Dkt. 101. Plaintiff filed a  
23 Reply brief on August 2, 2018. Dkt. 102.

24 77. On August 21, 2018, the Court entered an Order approving the form of notice and  
25 directing that it be sent to the class. Dkt. 104.

26 78. On October 16, 2019 Home Depot filed a motion to decertify the class. Dkt. 152.  
This was also the same date that the parties served their initial expert witness disclosure reports,

1 and Home Depot supported its motion with the declaration of expert Robert Crandall. Dkt. 152.1.

2 79. The deadline to oppose the decertification motion was extended multiple times  
3 initially due to the need to take Mr. Crandall's deposition (Dkt. 154), then because Home Depot  
4 produced over 30 hard-drives with video used by Mr. Crandall that Plaintiff's experts needed to  
5 review (Dkt. 157, 180, 187) due to the Covid-19 restrictions imposed in March 2020 (Dkt. 189  
6 192) and then due to the issues regarding the class data raised by Plaintiff's experts (Dkt. 204-  
7 209, 212-221, 226-228).

8 80. On June 30, 2020, Home Depot filed an administrative motion to supplement its  
9 prior briefing with additional evidence, which the Court initially granted. Dkt. 195, 196.

10 81. On July 6, 2020, Plaintiff filed an opposition to the motion. Dkt. 198.

11 82. After reviewing the opposition, the Court vacated the Order granting the motion  
12 and referred the motion to Magistrate Judge Kim. Dkt. 199.

13 83. On July 23, 2020, Magistrate Judge Kim entered an Order denying Home Depot's  
14 motion to supplement its prior briefing.

15 84. On August 13, 2021, Home Depot filed an administrative motion to file  
16 supplemental briefing in support of the motion to decertify. Dkt. 222.

17 85. Plaintiff opposed the motion. Dkt. 223.

18 86. On November 23, 2021, the Court granted Home Depot's motion to file  
19 Supplemental Briefing. Dkt. 225.

20 87. On March 14, 2022, after completion of expert depositions, Plaintiff filed his  
21 Opposition to Home Depot's motion to decertify. Dkt. 231. Home Depot filed a Reply brief on  
22 April 14, 2022. Dkt. 242.

23 88. On May 5, 2022, the Court held argument on the decertification motion. Dkt. 270.  
24 On May 6, 2022, the Court issued an Order denying the motion. Dkt. 272.

25 **8. Summary Judgment Motions.**

26 **a. Home Depot's Summary Adjudication Motion on the Rounding Claim.**

89. On August 9, 2017, Home Depot filed a Motion for Partial Summary Judgment

1 on Rounding Claim, along with declarations, a request for judicial notice, and a large volume of  
2 supporting documents and evidence. Dkt. 39-48.

3 90. On August 16, 2017, the Court issued an order requiring the parties to meet and  
4 confer regarding the filing of Plaintiff's 3AC, and the potential re-filing of Home Depot's motion  
5 for partial summary judgment in response thereto. Dkt. 52. The parties met and conferred as  
6 ordered by the Court, and on August 28, 2017, submitted a stipulation in which they agreed: (1)  
7 Plaintiff could file his 3AC, and (2) Home Depot's then pending motion for partial summary  
8 adjudication as to the rounding claim was withdrawn without prejudice to refile after Plaintiff filed  
9 his 3AC. Dkt. 53 & 54.

10 91. On October 20, 2017, Home Depot filed its renewed motion for partial summary  
11 judgment on the rounding claim, again, along with declarations, a request for judicial notice, and  
12 a large volume of supporting documents and evidence. Dkt. 57-66.

13 92. On November 3, 2017, Plaintiff filed his opposition, and on November 13, 2017,  
14 Home Depot filed its reply brief, both along with the relevant supporting documents.

15 93. On December 4, 2017, the Court granted Home Depot's motion for partial summary  
16 judgment as to the rounding claim. Dkt. 74.

17  
18 **b. Motions for Partial Summary Judgment as to Liability**

19 94. On December 4, 2017, Plaintiff filed a motion for entry of judgment under Rule  
20 54(b) and requested the Court sever the adjudicated rounding claim for immediate appeal. Dkt. 75.  
21 Home Depot filed its opposition on January 12, 2018, and Plaintiff filed his reply brief on January  
22 19, 2018. Dkt. 82 & 83. On January 31, 2018, the Court denied Plaintiff's motion. Dkt. 85.

23 95. On November 7, 2018, Plaintiff filed a motion for partial summary judgment in  
24 favor of the certified classes as to the first claim for relief in the 3AC, seeking a liability  
25 determination for on Plaintiff's walk-time and lock-in time claims, as well as the supporting  
26

1 documents and evidence, including eighty-one (81) declarations and exhibits in support thereof.  
2 Dkt. 108 & 109.

3  
4 96. After requesting and receiving an extension to respond, on March 28, 2019, Home  
5 Depot filed its opposition to Plaintiff's motion for summary judgment, along with twenty-nine (29)  
6 exhibits in support thereof. Dkt. 110-111, 122-124, 126.

7  
8 97. Also on March 28, 2019, Home Depot filed its own motion for partial summary  
9 judgment, seeking a liability determination in its favor, as well as a motion to strike class member  
10 declarations filed in support of Plaintiff's motion for partial summary judgment. Dkt. 127 & 128.

11  
12 98. On April 25, 2019, Plaintiff filed his: (1) reply brief in support of his motion for  
13 partial summary judgment, along with twenty-eight (28) supporting exhibits, (2) his opposition to  
14 Home Depot's motion to strike; and (3) his opposition to Home Depot's motion for partial  
15 summary judgment. Dkt. 131-133.

16  
17 99. On May 9, 2019, Home Depot filed its reply in support of its motion to strike, as  
18 well as its reply brief in support of its own motion for partial summary judgment, along with  
19 several declarations and exhibits. Dkt. 134 & 135.

20  
21 100. On May 23, 2019, the Court held oral argument for one hour on the parties' cross-  
22 motions for partial summary judgment, and Home Depot's motion to strike, and took the matter  
23 under submission. Dkt. 136. On July 11, 2019, the Court issued its order denying Plaintiff's motion  
24 for partial summary judgment and granting Home Depot's motion for partial summary judgment  
25 with respect to the Hourly Employees' waiting time and wage statement claims, but denying it in  
26 all other respects. Dkt. 148.

101. On January 6, 2020, Home Depot filed yet another motion for partial summary  
judgment, this time as to Plaintiff's Labor Code section 203 and 226 penalties. Dkt. 167.

1           102. On January 13, 2020 Plaintiff’s counsel emailed Home Depot’s counsel and  
2 requested that the motion be taken off calendar, given that the Court only allowed one summary  
3 judgment per side, and that Home Depot had previously filed a second one with leave of court, but  
4 that the instant motion had been filed without leave of court.

5           103. On January 14, 2020 Plaintiff filed an administrative motion seeking to have Home  
6 Depot’s motion taken off calendar. Dkt. 174.

7           104. On January 14, 2020, Home Depot took its pending motion for partial summary  
8 judgment off calendar and filed a belated motion for leave to file a motion for partial summary  
9 judgment, which this Court denied on January 21, 2020. Dkt. 173-175; 179.  
10

11           **10. Home Depot’s Challenges to the Pleadings.**

12           105. On March 24, 2022, Home Depot filed a belated motion for judgment on the  
13 pleadings, seeking judgment as to Plaintiff’s claim under California’s Unfair Competition Law  
14 (Business & Professions Code sections 17200, et seq.), based on the argument that Plaintiff has  
15 an adequate remedy at law. Dkt. 233.

16           106. Plaintiff filed his opposition on April 7, 2022, and Home Depot filed its reply  
17 brief on April 14, 2022. Dkt. 245 & 249.

18           107. On May 6, 2022, this Court issued an order granting Home Depot’s motion,  
19 “without any limitation on refiling in state court” because a “California court applying its own  
20 law could potentially find there was no adequate remedy at law for the extra year the UCL  
21 provides.” Dkt. 273, at 2:1-5:7.

22           108. In accordance with the Court’s Order on May 17, 2022, Plaintiff filed a  
23 Complaint with a standalone UCL claim in the Superior Court for the State of California County  
24 of Alameda, Case No. 22CV011360.

25           **11. Expert Witness Reports.**

26           109. Class counsel retained four experts: 1) Dr. Jon Krosnick as a survey expert, 2)

1 James Toney as a damages expert, 3) Brian Kriegler as a statistical and economic expert, 4) Gary  
2 White as a retail practices expert. Home Depot also retained four expert witnesses: (1) Robert  
3 Crandall (labor study expert), (2) G. Edward Anderson (damages expert), (3) Stephen Smith  
4 (survey expert), and (4) F. Timothy Trujillo (human resources expert). Dr. Krosnick performed a  
5 comprehensive survey aimed at providing evidence regarding the existence and prevalence of  
6 the alleged Labor Code violations. Dr. Krosnick ultimately provided three expert reports, with  
7 the first being 597 pages, the second being 214 pages, and the final report being 816 pages.

### 8 **12. Motions in Limine and Daubert Motions.**

9 110. The parties fully briefed six motions *in limine* to exclude and/or limit each other's  
10 experts. Dkt. 302, 317, 324 (Robert Crandall); 303, 321, 325 (Gary White); 304, 315, 327 (Timothy  
11 Trujillo); 305, 320, 328 (Dr. Jon Krosnick); 306, 316, 326 (Stephen Smith); & 307, 319, 329  
12 (James Toney). On October 4, 2022, the Court requested supplemental briefing on whether  
13 damages and liability should be bifurcated, how the individual claims of class members would be  
14 adjudicated, and how expert testimony would be offered at bifurcated phases of a trial. Dkt. 344.  
15 On November 10, 2022, the Court excluded Toney's and Krosnick's reports to the extent they  
16 proffered calculations of classwide damages. Dkt. 347. *Id.* at 9:24-10:8. The Court excluded the  
17 report of Plaintiff's retail practices expert Gary White. *Id.* at 11:11-12:7. The Court excluded  
18 portions of the Crandall report to the extent Mr. Crandall was opining on the percentage of class  
19 members engaged in personal tasks during pre-shift walk time. *Id.* at 5:22-25.

### 20 **13. Motion to Intervene in Overlapping Cases.**

21 111. Throughout this litigation, Class Counsel would periodically monitor other  
22 litigation against Home Depot for purposes of anticipating any effort to resolve the claims in  
23 this case in any later filed overlapping case.

24 112. As a result of that, in January of 2022, Plaintiffs became aware of a series of  
25 consolidated cases pending in the Southern District of California against Home Depot including  
26 the lead case *Barragan v. Home Depot*, Case No. 19-cv- 01766-AJB-AGS and *White v. Home*

1 *Depot USA Inc.*, Case No. 2:21-cv-08753-GW-JEM. The White case raised two of the claims at  
2 issue in *Utne*, the post shift waiting time claim, and a claim for rounding time punches.

3 113. As a result of reviewing filings in the consolidated Southern District cases, Class  
4 Counsel learned that the *Barragan* case was being mediated. This was concerning because Home  
5 Depot had filed a status report in *White* which indicated that Home Depot believed the claims  
6 asserted in *White* would be resolved in *Barragan*, which meant by implication that the post shift  
7 and rounding claims in *Utne* would be resolved in any settlement of *Barragan*.

8 114. After meeting and conferring with counsel for Home Depot and counsel for the  
9 Plaintiffs in the consolidated cases, *Utne* filed a motion to intervene and to stay or transfer on  
10 April 13, 2022. On April 19, 2022, *Utne* filed an ex parte application to shorten time on the  
11 motion to intervene.

12 115. On July 6, 2022, the Honorable Anthony Battaglia issued an order denying the  
13 motion to intervene in the *Barragan* case, but granting the motion to stay the *White* case  
14 pending resolution of *Utne*.

15 116. On March 31, 2022, *Utne* also filed a motion in this Court seeking sanctions  
16 against Home Depot for not disclosing the *Barragan* and *White* cases in a Notice of Related  
17 Case. ECF No. 240. Home Depot opposed the motion and *Utne* filed a reply. Dkt. 252, 257. On  
18 May 6, 2022, the Court entered an Oder denying the motion for sanctions. Dkt 273.

19 117. Class counsel also negotiated with Home Depot's counsel that any settlement in  
20 *Barragan* would exclude the claims at issue in *Utne*.

21 **14. Pretrial Investigation of Home Depot's Current Closing Shift Practices.**

22 118. In around May of 2022, Class Counsel retained a private investigative firm to  
23 conduct surveillance at Home Depot's stores to gauge the extent to which employees being  
24 locked in the store on closing shifts was an ongoing problem.

25 **14. Mediations**

26 119. On November 19, 2019, the parties mediated the case in person in San  
Francisco with mediator Anthony Piazza. The case did not settle.

1           120. On November 29, 2022, the parties attended a fully day mediation by Zoom with  
2 mediator Hunter Hughes. After the mediation, the parties continued settlement discussions with  
3 the assistance of Mr. Hughes, including Plaintiffs submitting a supplemental brief to Home  
4 Depot and the mediator on a specific issue. Mr. Hughes made a mediator's proposal on January  
5 26, 2023, which both parties accepted by the deadline of February 9, 2023.

6           **15. Settlement Agreement and Motion for Preliminary Approval**

7           121. After the acceptance of the mediator's proposal, Class Counsel drafted a  
8 Memorandum of Understanding. However, the parties ultimately opted to proceed directly  
9 to a Long Form Settlement Agreement which was drafted by Home Depot's counsel and  
10 edited by Class Counsel.

11           122. Class Counsel obtained settlement administrator bids, and drafted the preliminary  
12 approval papers, filing the motion for preliminary approval on June 22, 2023.

13           123. Notice to the Settlement Classes went out on September 27, 2023. Since that time  
14 my office has received dozens of phone calls from putative class members. Every call has been  
15 handled by an attorney either Thomas Segal or Farrah Grant.

16           **LITIGATION COSTS INCURRED ON CONTINGENT BASIS**

17           124. As set forth in the itemized expenses attached to this Declaration and the  
18 Declaration of Cody Kennedy, Class Counsel expended more than \$3 million in costs, with no  
19 guarantee of repayment. As Class Counsel worked on a contingent basis, these costs were not  
20 reimbursed by a client.

21           125. A true and correct copy of an itemization of costs prepared by Setareh Law  
22 Group's bookkeeper is attached hereto as Exhibit 1. The total costs paid by Setareh Law Group  
23 are \$2,465,938.94.

24           126. Setareh Law Group paid \$2,326,864.68 in expert costs, which was comprised of  
25 \$4894.40 to Dr. Brian Kriegler of Econ One Research for his rebuttal declaration, \$50,985.00 to  
26 retail practices expert Gary White, \$599,804 to Dr. Jon Krosnick for his survey and reports,  
\$279,986 to SSRS who made the phone calls for the Krosnick survey, \$1,131,487.78 to the



1 Strategy Team who worked with Dr. Krosnick on his survey and reports; \$58,662.50 for expert  
2 James Toney (JTC Corporation) and \$1045 to Kronos expert Veronica Lee Daniels.

3 127. Setareh Law Group paid \$6,209.28 to administrator CPT Group to send a notice  
4 to a sampling of class members that their contact information would be disclosed to Class  
5 Counsel if they did not opt out.

6 128. Setareh Law Group paid \$64,660.46 to administrator KCC for sending out the  
7 notice of class certification in this case.

8 129. Setareh Law Group paid \$14,019.21 in travel related costs.

9 130. Setareh Law Group paid \$54,185.31 in other costs including court reporters, legal  
10 research (Westlaw), court running services and including \$12,000 to mediator Antonio Piazza  
11 and \$10,000 to mediator Hunter Hughes.

12 131. In addition to the expenses incurred, the time devoted to this litigation required  
13 Setareh Law Group to turn away a number of other cases.

#### 14 **QUALIFICATIONS OF CLASS COUNSEL**

15 132. My firm and I, as principal of the Setareh Law Group, are well-experienced class  
16 action attorneys. I, have considerable experience in class action litigation. I, along with my  
17 associates, do not have a conflict of interest with the class. Therefore, we are qualified to serve as  
18 class counsel for the settlement class.

19 133. I received my undergraduate degree at UCLA in 1996 and my law degree from  
20 Loyola Law School in 1999. Since being admitted to the State Bar of California in 1999, I have  
21 actively practiced civil litigation for the entirety of that time period.

22 a. I, and the attorneys at Setareh Law Group, have been involved as lead class  
23 counsel, co-lead class counsel, and other levels of involvement in over 100  
24 wage-and-hour, and consumer class action cases.

25 b. I was lead counsel in *Troester v. Starbucks Corporation, et al.*, before the  
26 California Supreme Court, Case No. S234969, in which the Court issued a

1 landmark decision that clarified and rejected the application of the widely  
2 adopted federal *de minimis* doctrine to California’s wage-and-hour laws.

3 c. For my work on that case, I received the California Lawyer of the Year or  
4 “CLAY” award from the Daily Journal.

5 d. I represented the plaintiff in a Ninth Circuit victory involving the standards  
6 for motions to remand under the Class Action Fairness Act. *Harris v. KM*  
7 *Industrial, Inc.*, 980 F.3d 694 (9th Cir. 2020).

8 e. I am counsel of record in *Parsittie v. Schneider Logistics, Inc. et al.*, No. 20-  
9 55470 (9th Cir. June 9, 2021) wherein we reversed the trial Court’s Order  
10 granting Defendants motion to dismiss in a wage and hour class action.

11 f. I am counsel of record in *Rodriguez v. U.S. Healthworks, Inc.*, 813 Fed.Appx.  
12 315 (9th Cir. 2020) in which the Ninth Circuit reversed the trial court’s order  
13 granting summary judgment in a wage and hour class action.

14 g. I was also lead counsel in a landmark Ninth Circuit decision interpreting the  
15 Fair Credit Reporting Act, *Gilberg v. California Check Cashing Stores, LLC*,  
16 913 F.3d 1169 (9th Cir. 2019), reversing the District Court’s granting of  
17 Defendant’s Summary Judgment.

18 h. My firm is responsible for more than 140 Westlaw-citable opinions.

19 134. As the above shows, I have substantial experience in wage-and-hour class action  
20 litigation, including in actions alleging claims similar to the claims alleged in this case. I am  
21 knowledgeable about the applicable law, have diligently worked to investigate and identify the  
22 potential claims in this action, and will continue to commit the resources of my firm to further the  
23 interests of the Class.

24 135. The attorneys who worked on this matter are myself, Thomas Segal, William Pao,  
25 Farrah Grant, Tyson Gibb, Scott Leviant, Lilit-Ter-Astvatsatryan, Stacey Shim, Ashley Batiste, Alexandra  
26 McIntosh, Stacey Shim, Maxim Gorbunov, Alice Kim and Juliana Gesiotto.

136. Attorney Segal is a 2002 graduate of UC Law San Francisco (formerly UC Hastings).

1 He has been practicing complex litigation including consumer and wage and hour class actions since  
2 2005, has been the member of the trial team on two class action trials, and has argued multiple times  
3 before the California Court of Appeal and United States Court of Appeals for the Ninth Circuit.

4 137. Attorney Pao is a 2001 graduate of Loyola Law School. Prior to working at Setareh  
5 Law Group, he worked for 10 years as an associate at Parker Stanbury LLP where he advised and  
6 counseled employers on employment law. He has worked at Setareh Law Group since 2017 working  
7 on wage and hour and consumer class actions, and wrongful termination lawsuits.

8 138. Attorney Grant is a 2013 graduate of UCLA Law School. Since graduating law  
9 school, she has focused exclusively on representing employees and consumers in class action and  
10 wrongful termination litigation.

11 139. Attorney Gibb is a 2021 graduate of USC Law School. Since graduating law school,  
12 he has been employed at Setareh Law Group and has focused exclusively on representing employees  
13 and consumers in class action and wrongful termination litigation

14 140. Attorney Leviant (formerly of Setareh Law Group) is a 1998 graduate of USC Law  
15 School. He has been litigating class actions for employees and consumers since 1999.

16 141. Attorney Ter- Astvatsatryan (formerly of Setareh Law Group) is a 2017 UC Law San  
17 Francisco (formerly UC Hastings). She has been litigating class actions for employees  
18 and consumers since 2018.

19 142. Attorney Shim (formerly of Setareh Law Group) is a 2015 graduate of Loyola  
20 Law School. While at Setareh Law Group she was a junior associate working on employee and  
21 consumer class action lawsuits.

22 143. Attorney Batiste (formerly of Setareh Law Group) is a 2017 graduate of the  
23 University of Alabama School of Law. While at Setareh Law Group she was a junior associate  
24 working on employee and consumer class action lawsuits.

25 144. Attorney McIntosh (formerly of Setareh Law Group) is a 2017 graduate of the  
26 University of California Irvine School of Law. She has been litigating class actions for employees  
and consumers since 2018.



149. The below table sets forth the hours spent by Setareh Law Group attorneys on this case resulting in a lodestar of \$6,783,634:

Attorney	Bar Year	Hourly Rate	Hours	Total Fees
Shaun Setareh	1999	\$1,150	2658.68	\$3,057,482
Thomas Segal	2002	\$950.00	2823.12	\$2,681,964
H. Scott Leviant	1999	\$950	448.80	\$426,360
William Pao	2002	\$925	120.50	\$111,463
Farrah Grant	2013	\$650.00	301.00	\$195,650
Tyson Gibb	2021	\$475	376.05	\$178,624
Lilit Ter-Astvatsatryan	2018	\$400	249.20	\$99,680
Alex McIntosh	2018	\$425.00	16.60	\$10,790
Ashley Batiste	2017	\$375	8.15	\$3056
Stacey Shim	2015	\$360	35.90	\$12,924
Alice Kim	2013	\$325.00	5.50	\$3,575
Maxim Gorbunov	2021	\$410	2.60	\$1,066
Juliana Gesiotto	2022	\$400	2.50	\$1000
<b>Total</b>			7048.6	\$6,783,634

150. Paralegals and legal assistants at Setareh Law Group also spent thousands of hours on this case. This time is not included in the lodestar.

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

Executed on November 13, 2023, in Beverly Hills, California.

By: /s/ Shaun Setareh  
SHAUN SETAREH  
Declarant

# **EXHIBIT 1**

**to**

**Declaration of Shaun Setareh**

Date	Name	Memo	Account	Amount
02/17/2022	Econ One	Inv # 21289	Home Depot (Utne)	4,894.40
			<b>Total Econ</b>	<b>4,894.40</b>
01/20/2022	Gary White	Inv. # Utne006	Home Depot (Utne)	2,220.75
09/12/2019	Gary White	Inv. # Utne001	Home Depot (Utne)	3,998.00
01/16/2020	Gary White	Inv. # Utne005	Home Depot (Utne)	4,504.50
08/23/2019	Gary White	Inv. # Utne001	Home Depot (Utne)	5,200.00
01/20/2022	Gary White	Inv. # Utne007	Home Depot (Utne)	5,546.25
10/14/2019	Gary White	Inv. # Utne003	Home Depot (Utne)	8,237.25
10/14/2019	Gary White	Inv. # Utne002	Home Depot (Utne)	8,914.50
10/23/2019	Gary White	Inv. # Utne004	Home Depot (Utne)	12,363.75
			<b>Total Gary White</b>	<b>50,985.00</b>
06/09/2023	Jon Krosnick	Home Depot	Home Depot (Utne)	470.00
06/22/2021	Jon Krosnick	invoice 6/14/21	Home Depot (Utne)	700.00
10/27/2021	Jon Krosnick	invoice 10/13/21	Home Depot (Utne)	720.00
08/27/2021	Jon Krosnick	invoice 8/9/21	Home Depot (Utne)	800.00
11/19/2021	Jon Krosnick	invoice 10/31/21	Home Depot (Utne)	920.00
10/10/2019	Jon Krosnick	invoice 7/26/19	Home Depot (Utne)	1,230.00
07/23/2021	Jon Krosnick	invoice 7/8/21	Home Depot (Utne)	1,480.00
06/09/2023	Jon Krosnick	Home Depot - Arizona	Home Depot (Utne)	1,860.00
06/22/2021	Jon Krosnick	invoice 5/18/21	Home Depot (Utne)	2,400.00
06/09/2023	Jon Krosnick	Home Depot - Non - Arizona	Home Depot (Utne)	5,020.00
03/18/2021	Jon Krosnick	invoice 3/7/21	Home Depot (Utne)	6,550.00
05/14/2021	Jon Krosnick	invoice 4/11/21	Home Depot (Utne)	6,700.00
06/16/2022	Jon Krosnick	invoice 6/12/22	Home Depot (Utne)	8,950.00
10/31/2018	Jon Krosnick	deposit for invoice \$23360.00	Home Depot (Utne)	10,000.00
08/05/2019	Jon Krosnick	invoice \$23360.00	Home Depot (Utne)	13,360.00
11/12/2019	Jon Krosnick	invoice 10/24/19	Home Depot (Utne)	15,080.00
11/03/2020	Jon Krosnick	invoice 11/1/20	Home Depot (Utne)	15,180.00
07/13/2020	Jon Krosnick	invoice 6/28/20	Home Depot (Utne)	21,550.00
11/01/2019	Jon Krosnick	invoice 10/24/19	Home Depot (Utne)	25,000.00
03/27/2020	Jon Krosnick	invoice 10/13/19	Home Depot (Utne)	30,220.00
02/26/2021	Jon Krosnick	invoice 2/6/21	Home Depot (Utne)	33,380.00
09/10/2020	Jon Krosnick	invoice 8/30/20	Home Depot (Utne)	33,850.00
12/23/2020	Jon Krosnick	invoice 12/9/20	Home Depot (Utne)	35,970.00
09/04/2019	Jon Krosnick	invoice 7/26/19	Home Depot (Utne)	40,000.00
07/30/2020	Jon Krosnick	invoice 7/26/20	Home Depot (Utne)	44,500.00
08/07/2019	Jon Krosnick	invoice 7/26/19	Home Depot (Utne)	50,000.00
10/14/2020	Jon Krosnick	invoice 10/10/20	Home Depot (Utne)	50,970.00
07/13/2020	Jon Krosnick	invoice 5/25/20	Home Depot (Utne)	56,550.00
07/07/2022	Jon Krosnick	invoice 2/6/22, 4/22/22, 12/8/21 (total invoice \$	Home Depot (Utne)	86,394.00
			<b>Total Jon Krosnick</b>	<b>599,804.00</b>
04/19/2018	JTC Corporation LLC	Inv.#180402	Home Depot (Utne)	1,300.00
12/05/2021	JTC Corporation LLC	Inv. # 211206	Home Depot (Utne)	1,350.00
09/01/2017	JTC Corporation LLC	Inv.#17807	Home Depot (Utne)	1,500.00
04/22/2022	JTC Corporation LLC	Inv. # 220416	Home Depot (Utne)	1,850.00
12/17/2020	JTC Corporation LLC	Inv. # 201203	Home Depot (Utne)	1,900.00
07/29/2020	JTC Corporation LLC	Inv.# 200505	Home Depot (Utne)	2,550.00
02/08/2022	JTC Corporation LLC	Inv. # 220106	Home Depot (Utne)	2,562.50
11/03/2020	JTC Corporation LLC	Inv.# 201101	Home Depot (Utne)	3,600.00
04/04/2022	JTC Corporation LLC	Inv. # 211230	Home Depot (Utne)	3,750.00
09/10/2019	JTC Corporation LLC	Inv.# 190903	Home Depot (Utne)	5,100.00
06/09/2020	JTC Corporation LLC	Inv.# 200507	Home Depot (Utne)	7,250.00
10/13/2020	JTC Corporation LLC	Inv.# 200904	Home Depot (Utne)	7,300.00
09/16/2020	JTC Corporation LLC	Inv.# 20014	Home Depot (Utne)	8,300.00

11/11/2019	JTC Corporation LLC	Inv.# 191107	Home Depot (Utne)	10,350.00
			<b>Total JTC</b>	<b>58,662.50</b>
01/22/2019	SSRS	Inv. # 017876	Home Depot (Utne)	30,000.00
08/07/2019	SSRS	Inv. # 018176	Home Depot (Utne)	50,000.00
09/09/2019	SSRS	Inv. # 018233	Home Depot (Utne)	50,000.00
01/29/2020	SSRS	Inv. # 018416	Home Depot (Utne)	68,890.00
01/29/2020	SSRS	Inv. # 0018325	Home Depot (Utne)	81,096.00
			<b>Total SSRS</b>	<b>279,986.00</b>
07/26/2021	The Strategy Team, Ltd	Inv. # 3166	Home Depot (Utne)	3,739.25
08/17/2021	The Strategy Team, Ltd	Inv. # 3179	Home Depot (Utne)	4,350.00
08/27/2021	The Strategy Team, Ltd	Inv. # 3179	Home Depot (Utne)	5,425.00
01/16/2020	The Strategy Team, Ltd	Inv. # 2981	Home Depot (Utne)	5,481.25
07/15/2020	The Strategy Team, Ltd	Inv. # 3034	Home Depot (Utne)	5,525.00
04/01/2019	The Strategy Team, Ltd	Inv # 2904	Home Depot (Utne)	7,456.25
11/09/2018	The Strategy Team, Ltd		Home Depot (Utne)	10,000.00
08/29/2019	The Strategy Team, Ltd	Inv.# 2937	Home Depot (Utne)	10,942.00
06/17/2019	The Strategy Team, Ltd	Inv.# 2925	Home Depot (Utne)	11,386.40
08/29/2019	The Strategy Team, Ltd	Inv. # 2944	Home Depot (Utne)	14,058.00
07/22/2019	The Strategy Team, Ltd	Inv.# 2932	Home Depot (Utne)	15,000.00
04/27/2019	The Strategy Team, Ltd	Inv # 2922	Home Depot (Utne)	15,857.92
06/22/2021	The Strategy Team, Ltd	Inv. # 3149	Home Depot (Utne)	17,516.75
09/06/2019	The Strategy Team, Ltd	Inv. # 2944	Home Depot (Utne)	19,822.00
12/19/2019	The Strategy Team, Ltd	Inv. # 2971	Home Depot (Utne)	24,030.43
11/01/2019	The Strategy Team, Ltd	Inv. # 2960	Home Depot (Utne)	25,000.00
06/09/2020	The Strategy Team, Ltd	Inv. # 3022	Home Depot (Utne)	25,121.92
11/11/2019	The Strategy Team, Ltd	Inv. # 2960	Home Depot (Utne)	26,609.00
11/19/2021	The Strategy Team, Ltd	Inv. # 3230	Home Depot (Utne)	27,290.00
09/09/2019	The Strategy Team, Ltd	Inv. # 2953	Home Depot (Utne)	31,855.25
10/09/2019	The Strategy Team, Ltd	Inv. # 2953	Home Depot (Utne)	31,855.25
12/17/2021	The Strategy Team, Ltd	Inv. # 3244	Home Depot (Utne)	34,697.75
08/07/2019	The Strategy Team, Ltd	Inv.# 2932	Home Depot (Utne)	35,000.00
12/09/2019	The Strategy Team, Ltd	Inv. # 2963	Home Depot (Utne)	40,000.00
12/19/2019	The Strategy Team, Ltd	Inv. # 2963	Home Depot (Utne)	50,988.75
02/18/2021	The Strategy Team, Ltd	Inv. # 3101	Home Depot (Utne)	54,881.25
07/07/2022	The Strategy Team, Ltd	Inv. # 3289, 3265, 3254 (total Inv. \$ 90,310.56)	Home Depot (Utne)	63,217.39
02/16/2022	The Strategy Team, Ltd	Inv. # 3254	Home Depot (Utne)	74,369.75
08/10/2020	The Strategy Team, Ltd	Inv. # 3042	Home Depot (Utne)	131,381.25
09/10/2020	The Strategy Team, Ltd	Inv. # 3051	Home Depot (Utne)	229,432.13
11/05/2020	The Strategy Team, Ltd	Inv. # 3061	Home Depot (Utne)	279,197.84
			<b>Total The Strategy Team:</b>	<b>1,331,487.78</b>
02/26/2021	Veronica Lee McDaniels	Inv. # 0001 (Kronos Consultant)	Home Depot (Utne)	1,045.00
			<b>Total Veronica</b>	<b>1,045.00</b>
			<b>Total Expert Cost:</b>	<b>2,326,864.68</b>
07/18/2017	American Airlines	Shaun Setareh, 7/18/17	Home Depot (Utne)	25.00
05/20/2019	AmTrak Train	Thomas Segal, 5/22/19	Home Depot (Utne)	29.00
05/21/2019	AmTrak Train	Shaun Setareh, 5/22/19	Home Depot (Utne)	29.00
08/16/2018	BART Transpotation		Home Depot (Utne)	13.33
01/21/2019	BART Transpotation		Home Depot (Utne)	75.00
01/21/2019	Bob Hope		Home Depot (Utne)	32.00
11/19/2019	Bob Hope		Home Depot (Utne)	37.00
05/23/2019	Bob Hope		Home Depot (Utne)	64.00
07/17/2017	Delta	Shaun Setareh 7/17/17, conf# GDN22B	Home Depot (Utne)	554.20
11/18/2019	Hotels.Com	John Utne, 11/18/19-11/20/19	Home Depot (Utne)	1,565.60



10/23/2019	Expedia	John Utne, 11/18/19	Home Depot (Utne)	305.86
11/19/2019	Intercontinental	Thomas Segal, 11/18/19	Home Depot (Utne)	22.26
11/19/2019	Intercontinental	Shaun Setareh, 11/18/19	Home Depot (Utne)	154.65
11/15/2019	Intercontinental	Shaun Setareh, 11/18/19	Home Depot (Utne)	1,048.18
11/15/2019	Intercontinental	Thomas Segal, 11/18/19	Home Depot (Utne)	1,048.18
11/19/2019	LAX Airport		Home Depot (Utne)	69.00
03/01/2018	LAX Airport Lot		Home Depot (Utne)	30.00
01/08/2019	LAX Airport Lot		Home Depot (Utne)	40.00
01/09/2019	LAX Airport Lot		Home Depot (Utne)	40.00
01/24/2019	LAX Airport Lot		Home Depot (Utne)	40.00
01/24/2019	LAX Sky Coffee		Home Depot (Utne)	4.05
03/01/2018	LAX Sky Coffee		Home Depot (Utne)	7.27
01/04/2019	LAZ Parking		Home Depot (Utne)	37.00
01/11/2019	LAZ Parking		Home Depot (Utne)	37.00
01/14/2019	LAZ Parking		Home Depot (Utne)	37.00
02/08/2019	Liit Ter-Astvatsatryan	parking reimbursement 1/30/19	Home Depot (Utne)	34.00
09/01/2022	Lorenzo Pinto	\$35 parking, \$7 toll road, \$10.94 (17.5 miles)	Home Depot (Utne)	52.94
05/23/2019	Lyft		Home Depot (Utne)	159.67
05/21/2019	Palace Hotel	Shaun Setareh, 5/22/19	Home Depot (Utne)	953.63
01/09/2019	Peets Coffee/Tea		Home Depot (Utne)	4.60
12/13/2018	Philz Coffee		Home Depot (Utne)	3.73
05/24/2019	Philz Coffee		Home Depot (Utne)	3.73
12/06/2018	Philz Coffee		Home Depot (Utne)	5.03
08/18/2017	Priceline.com	Shaun Setareh 7/17/17, conf # BHRCHG (\$732	Home Depot (Utne)	-297.35
07/14/2017	Priceline.com	Shaun Setareh 7/17/17, conf # BHRCHG	Home Depot (Utne)	732.16
01/03/2019	Rafael Calderon	26 miles	Home Depot (Utne)	14.17
01/03/2019	Rafael Calderon	parking	Home Depot (Utne)	44.00
07/18/2017	Ritz Carlton Hotel	Atlanta	Home Depot (Utne)	9.95
12/27/2019	Omid Nassir	Lyft Reimbursement	Home Depot (Utne)	11.05
12/06/2018	SF Soup Co.		Home Depot (Utne)	30.75
05/21/2019	Southwest Air	Conf#MPNIWG, Thomas Segal, 5/23/19	Home Depot (Utne)	-276.96
12/07/2018	Southwest Air	Conf# JQKINM, Shaun Setareh, 12/13/18	Home Depot (Utne)	-59.00
11/19/2019	Southwest Air	Conf#L3KIRU, Shaun Setareh, 11/18/19-11/19/19	Home Depot (Utne)	20.00
11/19/2018	Southwest Air	Conf# T8YS2C, Shaun Setareh, 12/6/18	Home Depot (Utne)	29.49
01/24/2019	Southwest Air	Shaun Setareh	Home Depot (Utne)	39.00
01/07/2019	Southwest Air	Shaun Setareh, 1/7/19	Home Depot (Utne)	59.00
01/23/2019	Southwest Air	Conf# QTZG8S, Shaun Setareh, 1/24/19	Home Depot (Utne)	85.00
08/09/2018	Southwest Air	Conf# NESQ4G, Leviant Howard, 8/16/18	Home Depot (Utne)	126.32
11/07/2019	Southwest Air	Conf#OUAREO, Thomas Segal, 11/19/19	Home Depot (Utne)	129.98
12/07/2018	Southwest Air	Conf# JQKINM, Shaun Setareh, 12/13/18	Home Depot (Utne)	137.98
12/07/2018	Southwest Air	Conf# JQK3YO, Shaun Setareh, 12/13/18	Home Depot (Utne)	159.98
11/07/2019	Southwest Air	Conf#OUAZGD, Thomas Segal, 11/19/19	Home Depot (Utne)	167.98
01/08/2019	Southwest Air	Conf# VUYL4P, Chaim Setareh, 1/9/19	Home Depot (Utne)	178.98
01/08/2019	Southwest Air	Conf# VUVK7T, Chaim Setareh, 1/9/19	Home Depot (Utne)	229.98
05/21/2019	Southwest Air	Conf#RO325M, Thomas Segal, 5/23/19	Home Depot (Utne)	252.98
12/28/2018	Southwest Air	Conf# R7PDCY, Shaun Setareh, 1/7/19	Home Depot (Utne)	259.96
01/11/2019	Southwest Air	Conf# QTZG8S, Shaun Setareh, 1/24/19	Home Depot (Utne)	279.96
05/10/2019	Southwest Air	Conf#MQUD6O, Shaun Setareh, 5/23/19	Home Depot (Utne)	289.96
11/15/2019	Southwest Air	Conf#L3KIRU, Shaun Setareh, 11/18/19-11/19/19	Home Depot (Utne)	339.96
02/27/2018	Southwest Air	Conf# KQL73T, Scott Leviant, 3/1/18	Home Depot (Utne)	394.96
02/27/2018	Southwest Air	Conf# KQL73T, Shaun Setareh, 3/1/18	Home Depot (Utne)	394.96
01/18/2019	Southwest Air	Conf# K3B4FZ, Howard Leviant, 1/21/19	Home Depot (Utne)	445.97
11/15/2019	Southwest Air	Conf#L7G2CN, Thomas Segal, 11/18/19-11/19/19	Home Depot (Utne)	493.96
07/17/2023	Southwest Air	Utne v. Home Depot Case	Home Depot (Utne)	522.96
07/17/2023	Southwest Air	Utne v. Home Depot	Home Depot (Utne)	532.95
05/23/2019	Specialty's Cafe		Home Depot (Utne)	35.43
12/06/2018	Starbucks		Home Depot (Utne)	12.90
11/19/2019	Sushi Takasan		Home Depot (Utne)	50.84

03/11/2020	Bernardo Alvarez	parking reimbursement for 1/14/19	Home Depot (Utne)	40.00
07/18/2017	Carolyns Gourmet Cafe Atlanta		Home Depot (Utne)	8.16
03/01/2018	Golden Era Vegan Restaurant		Home Depot (Utne)	26.25
01/17/2019	Heather Wood	42 miles	Home Depot (Utne)	22.89
01/17/2019	Heather Wood	parking	Home Depot (Utne)	30.00
01/21/2019	Jamba Juice		Home Depot (Utne)	8.39
03/08/2019	James Wright	reimbursement for parking & mileage	Home Depot (Utne)	84.00
06/14/2019	Thomas A Segal	5/22/19	Home Depot (Utne)	8.15
07/18/2017	Uber Technologie		Home Depot (Utne)	1.00
05/23/2019	Uber Technologie		Home Depot (Utne)	1.00
05/23/2019	Uber Technologie		Home Depot (Utne)	1.00
05/23/2019	Uber Technologie		Home Depot (Utne)	1.00
05/23/2019	Uber Technologie		Home Depot (Utne)	1.00
08/16/2018	Uber Technologie		Home Depot (Utne)	1.67
03/02/2018	Uber Technologie		Home Depot (Utne)	2.50
01/24/2019	Uber Technologie		Home Depot (Utne)	3.00
01/11/2019	Uber Technologie		Home Depot (Utne)	5.00
01/11/2019	Uber Technologie		Home Depot (Utne)	5.11
11/20/2019	Uber Technologie		Home Depot (Utne)	5.78
07/18/2017	Uber Technologie		Home Depot (Utne)	7.42
03/02/2018	Uber Technologie		Home Depot (Utne)	8.04
12/13/2018	Uber Technologie		Home Depot (Utne)	8.10
08/16/2018	Uber Technologie		Home Depot (Utne)	8.84
01/11/2019	Uber Technologie		Home Depot (Utne)	10.16
12/06/2018	Uber Technologie		Home Depot (Utne)	11.29
11/19/2019	Uber Technologie		Home Depot (Utne)	13.00
05/23/2019	Uber Technologie		Home Depot (Utne)	13.30
05/23/2019	Uber Technologie		Home Depot (Utne)	13.46
05/23/2019	Uber Technologie		Home Depot (Utne)	14.22
11/20/2019	Uber Technologie		Home Depot (Utne)	16.60
07/18/2017	Uber Technologie		Home Depot (Utne)	16.92
07/18/2017	Uber Technologie		Home Depot (Utne)	22.10
03/02/2018	Uber Technologie		Home Depot (Utne)	32.19
05/23/2019	Uber Technologie		Home Depot (Utne)	34.98
12/06/2018	Uber Technologie		Home Depot (Utne)	35.28
01/24/2019	Uber Technologie		Home Depot (Utne)	35.35
01/25/2019	Uber Technologie		Home Depot (Utne)	35.80
03/01/2018	Uber Technologie		Home Depot (Utne)	36.82
11/19/2019	Uber Technologie		Home Depot (Utne)	38.55
12/13/2018	Uber Technologie		Home Depot (Utne)	38.96
01/07/2019	Uber Technologie		Home Depot (Utne)	40.81
01/08/2019	Uber Technologie		Home Depot (Utne)	42.55
03/01/2018	Uber Technologie		Home Depot (Utne)	44.56
01/09/2019	Uber Technologie		Home Depot (Utne)	44.76
07/17/2017	Uber Technologie		Home Depot (Utne)	48.35
12/13/2018	Uber Technologie		Home Depot (Utne)	48.59
03/01/2018	Uber Technologie		Home Depot (Utne)	54.32
11/20/2019	Uber Technologie		Home Depot (Utne)	62.84
11/19/2019	Uber Technologie		Home Depot (Utne)	63.19
01/09/2019	Uber Technologie		Home Depot (Utne)	66.89
12/06/2018	Uber Technologie		Home Depot (Utne)	216.51
03/01/2018	Vino Volo Grill		Home Depot (Utne)	40.14
01/14/2019	La Colombe		Home Depot (Utne)	4.00
01/24/2019	Ladle and Leaf Oakland		Home Depot (Utne)	12.01
12/13/2018	Ladle and Leaf Oakland		Home Depot (Utne)	18.77
01/07/2019	Ladle and Leaf SF		Home Depot (Utne)	20.72
01/15/2019	Tocaya Organica Century		Home Depot (Utne)	40.80
			<b>Total Travel</b>	<b>14,019.21</b>

08/17/2018	CPT Group Inc	Inv.# 13566	Home Depot (Utne)	1,209.28
04/03/2018	CPT Group Inc	Inv.# 13566	Home Depot (Utne)	5,000.00
			<b>Total CPT</b>	<b>6,209.28</b>
02/14/2023	KCC Clas Action Services, LLC	INV#US-ASG1509523-ACCT#HMU-ROS	Home Depot (Utne)	64,660.46
			<b>Total KCC</b>	<b>64,660.46</b>
06/01/2019	Ana M. Dub	Court Reporter	Home Depot (Utne)	245.25
10/14/2019	Antonio Piazza	Utne v Home Depot, 11/19/19	Home Depot (Utne)	12,000.00
06/08/2022	Belle Ball, CSR, CRR, RDR	Transcript case # 16-CV-01854-RS	Home Depot (Utne)	31.50
12/20/2019	California Computer	inv. # 0015850-IN	Home Depot (Utne)	674.52
11/21/2019	California Computer	inv. # 0015741-IN	Home Depot (Utne)	3,709.08
09/22/2016	Court Call		Home Depot (Utne)	30.00
01/29/2018	Court Call	ID# 8865291, case # RG16806847	Home Depot (Utne)	116.00
10/07/2017	Discovery Litigation Services, LLC	case # 3:16-CV-01854-RS	Home Depot (Utne)	2,367.94
09/30/2019	FedEx	Inv.# 6-750-46549	Home Depot (Utne)	10.21
12/31/2019	FedEx	Inv.# 6-881-57738, 12/27/19	Home Depot (Utne)	10.23
07/22/2022	FedEx	Inv.# 7-826-98998, 7/22/22	Home Depot (Utne)	11.19
09/30/2020	FedEx	Inv.# 7-120-75739, 9/11/20	Home Depot (Utne)	19.46
08/31/2020	FedEx	Inv.# 7-101-43272, 8/21/20	Home Depot (Utne)	21.51
02/28/2019	FedEx	Inv.# 6-447-49384, 2/1/19	Home Depot (Utne)	24.98
08/31/2019	FedEx	Inv.# 6-708-60974, 8/16/19	Home Depot (Utne)	25.34
02/28/2019	FedEx	Inv.# 6-454-54137, 2/8/19	Home Depot (Utne)	27.85
01/31/2020	FedEx	Inv.# 6-913-63640, 1/31/20	Home Depot (Utne)	29.61
06/30/2019	FedEx	Inv.# 6-597-88915, 6/28/19	Home Depot (Utne)	80.54
12/31/2019	FedEx	Inv.# 6-881-57738, 12/27/19	Home Depot (Utne)	108.93
11/28/2022	Hunter R. Hughes, III	John Utne et al.v. Home Depot USA-Case#3:16	Home Depot (Utne)	10,000.00
04/20/2023	Investigative Resourses, Inc.	IRI#23-0330.6-Karen Lou Unte	Home Depot (Utne)	809.35
02/06/2019	Jacob Hackelton	reimbursement for deposition	Home Depot (Utne)	160.04
11/26/2019	John Utne		Home Depot (Utne)	114.84
05/04/2022	Katherine Powell Sullivan,CSR, RMR, CRR	Case # 16-CV1854	Home Depot (Utne)	33.60
02/06/2019	Kevin Darish	reimbursement for deposition	Home Depot (Utne)	33.36
12/01/2016	One Legal LLC	Sales Order # 10708316, Case# 3:16-CV-01854	Home Depot (Utne)	26.95
09/19/2017	One Legal LLC	Sales Order # 11379967, Case# 3:16-CV-01854	Home Depot (Utne)	27.95
11/07/2017	One Legal LLC	Sales Order # 11499399, Case# 3:16-CV-01854	Home Depot (Utne)	27.95
11/19/2017	One Legal LLC	Sales Order # 11525972, Case# 3:16-CV-01854	Home Depot (Utne)	27.95
01/03/2018	One Legal LLC	Sales Order # 11622955, Case# 3:16-CV-01854	Home Depot (Utne)	27.95
04/23/2018	One Legal LLC	Sales Order # 11913348, Case#3:16-CV-01854	Home Depot (Utne)	30.00
11/07/2019	One Legal LLC	Sales Order # 13992367, Case# 3:16-CV-01854	Home Depot (Utne)	40.00
11/11/2019	One Legal LLC	Sales Order # 14014356, Case# 3:16-CV-01854	Home Depot (Utne)	40.00
11/07/2019	One Legal LLC	Sales Order # 13977547, Case# 3:16-CV01854	Home Depot (Utne)	75.00
11/11/2019	One Legal LLC	Sales Order # 13977065, Case# 3:16CV-01854	Home Depot (Utne)	75.00
02/14/2018	One Legal LLC	Sales Order # 11737407, Case# 3:16-CV-01854	Home Depot (Utne)	90.00
11/19/2019	One Legal LLC	Sales Order # 14014380, Case# 3:16-CV-01854	Home Depot (Utne)	125.00
11/07/2019	One Legal LLC	Sales Order # 13989349, Case# 3:16CV-01854	Home Depot (Utne)	140.00
11/30/2022	PACER	ACCT#2957234	Home Depot (Utne)	0.20
06/05/2023	PACER	#12-02499	Home Depot (Utne)	0.30
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	0.40
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	0.50
09/30/2018	PACER		Home Depot (Utne)	0.60
06/05/2023	PACER	#19-01766	Home Depot (Utne)	0.60
06/30/2017	PACER	2nd Qtr., Inv.# 2957234-Q22017	Home Depot (Utne)	0.90
03/31/2018	PACER	1st Qtr., Inv.# 2957234-Q12018	Home Depot (Utne)	1.00
08/05/2016	PACER	Account # 2957234, inv.# 2957234-Q22016	Home Depot (Utne)	1.70
11/30/2022	PACER	ACCT#2957234	Home Depot (Utne)	1.70
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	1.90
11/30/2022	PACER	ACCT#2957234	Home Depot (Utne)	2.00

09/30/2020	PACER	Inv. # 2957234-Q32020	Home Depot (Utne)	2.20
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	2.30
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	2.60
06/05/2023	PACER	ACCT#2957234	Home Depot (Utne)	3.00
06/05/2023	PACER	#16-01854	Home Depot (Utne)	3.00
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	3.00
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	3.00
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	3.00
06/05/2023	PACER	ACCT#2957234	Home Depot (Utne)	3.10
06/30/2020	PACER	Inv. # 2957234-Q22020	Home Depot (Utne)	3.20
03/31/2021	PACER	Inv. # 2957234-Q12021	Home Depot (Utne)	3.20
06/05/2023	PACER	#16-01854	Home Depot (Utne)	3.30
11/30/2022	PACER	ACCT#2957234	Home Depot (Utne)	3.30
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	3.40
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	3.40
09/30/2019	PACER	acc # 2957234	Home Depot (Utne)	3.60
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	4.40
12/31/2021	PACER	Inv. # 2957234-Q42021	Home Depot (Utne)	4.90
09/30/2016	PACER	Account # 2957234, Inv.# 3rd QTR	Home Depot (Utne)	5.00
06/05/2023	PACER	ACCT#2957234	Home Depot (Utne)	5.10
06/05/2023	PACER	#12-02499	Home Depot (Utne)	5.80
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	6.00
03/31/2019	PACER	Inv.# 2957234-Q12019	Home Depot (Utne)	6.80
11/30/2022	PACER	ACCT#2957234	Home Depot (Utne)	7.70
06/05/2023	PACER	#12-05199	Home Depot (Utne)	8.80
11/30/2022	PACER	ACCT#2957234	Home Depot (Utne)	9.10
12/31/2016	PACER	4th Qtr., Inv.# 2957234-Q42016	Home Depot (Utne)	9.50
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	10.00
09/30/2019	PACER	acc # 2957234	Home Depot (Utne)	10.80
03/31/2022	PACER	Inv. # 2957234-Q12022	Home Depot (Utne)	11.20
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	11.90
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	12.50
06/05/2023	PACER	ACCT#2957234	Home Depot (Utne)	13.90
09/30/2021	PACER	Inv. # 2957234-Q32021	Home Depot (Utne)	14.10
07/10/2023	PACER	Setarehlaw907	Home Depot (Utne)	14.10
06/05/2023	PACER	ACCT#2957234	Home Depot (Utne)	14.20
12/31/2018	PACER		Home Depot (Utne)	15.60
09/30/2017	PACER	3rd Qtr., Inv.# 2957234-Q32017	Home Depot (Utne)	16.70
09/30/2020	PACER	Inv. # 2957234-Q32020	Home Depot (Utne)	17.50
11/30/2022	PACER	ACCT#2957234	Home Depot (Utne)	21.10
03/31/2019	PACER	Inv.# 2957234-Q12019	Home Depot (Utne)	21.90
11/30/2022	PACER	ACCT#2957234	Home Depot (Utne)	22.30
11/30/2022	PACER	ACCT#2957234	Home Depot (Utne)	25.90
12/31/2019	PACER	acc # 2957234	Home Depot (Utne)	54.60
03/31/2020	PACER	acc # 2957234	Home Depot (Utne)	69.90
06/30/2022	PACER	Inv. # 2957234-Q22022	Home Depot (Utne)	75.00
06/30/2019	PACER		Home Depot (Utne)	107.30
03/31/2022	PACER	Inv. # 2957234-Q12022	Home Depot (Utne)	172.80
06/30/2022	PACER	Inv. # 2957234-Q22022	Home Depot (Utne)	215.50
02/06/2019	Sally Stein	reimbursement for deposition	Home Depot (Utne)	53.10
12/13/2018	Superior Court of CA County of Alameda	Case # RG18913668	Home Depot (Utne)	6.00
08/09/2016	Superior Court of CA County of Alameda	case# RG16806847	Home Depot (Utne)	7.50
01/21/2019	SWA Board		Home Depot (Utne)	30.00
02/29/2020	Thomson Reuters-West	2.26	Home Depot (Utne)	2.26
07/31/2022	Thomson Reuters-West	6.66	Home Depot (Utne)	6.66
06/30/2019	Thomson Reuters-West	12.69	Home Depot (Utne)	12.69
02/28/2019	Thomson Reuters-West	15.84	Home Depot (Utne)	15.84
01/31/2022	Thomson Reuters-West	19.40	Home Depot (Utne)	19.4

01/31/2019	Thomson Reuters-West	1290	Home Depot (Utne)	23.15
06/01/2023	Thomson Reuters-West	Account# 1000834390	Home Depot (Utne)	25.36
06/13/2023	Thomson Reuters-West	THOMSON WEST*TCD	Home Depot (Utne)	31.77
06/13/2023	Thomson Reuters-West	THOMSON WEST*TCD	Home Depot (Utne)	34.73
10/31/2019	Thomson Reuters-West	43.36	Home Depot (Utne)	43.36
01/05/2023	Thomson Reuters-West	Confirmation#000358233210 for Sep,Oct,Nov,I	Home Depot (Utne)	55.24
07/31/2019	Thomson Reuters-West	60.12	Home Depot (Utne)	60.12
07/31/2019	Thomson Reuters-West	64.91	Home Depot (Utne)	64.91
06/13/2023	Thomson Reuters-West	THOMSON WEST*TCD	Home Depot (Utne)	66.82
12/31/2019	Thomson Reuters-West	98.30	Home Depot (Utne)	98.3
09/12/2023	Thomson Reuters-West	Inv no. 848906794 A/c 1000834390	Home Depot (Utne)	109.33
07/07/2023	Thomson Reuters-West	Acct#1000834390	Home Depot (Utne)	115.54
01/05/2023	Thomson Reuters-West	Confirmation#000358233210 for Sep,Oct,Nov,I	Home Depot (Utne)	118.57
04/30/2019	Thomson Reuters-West	160.41	Home Depot (Utne)	160.41
01/05/2023	Thomson Reuters-West	Confirmation#000358233210 for Sep,Oct,Nov,I	Home Depot (Utne)	183.79
01/05/2023	Thomson Reuters-West	Confirmation#000358233210 for Sep,Oct,Nov,I	Home Depot (Utne)	184.49
01/05/2023	Thomson Reuters-West	Confirmation#000358233210 for Sep,Oct,Nov,I	Home Depot (Utne)	192.05
01/05/2023	Thomson Reuters-West	Confirmation#000358233210 for Sep,Oct,Nov,I	Home Depot (Utne)	199.62
01/31/2020	Thomson Reuters-West	273.35	Home Depot (Utne)	273.35
01/05/2023	Thomson Reuters-West	Confirmation#000358233210 for Sep,Oct,Nov,I	Home Depot (Utne)	275.02
07/31/2022	Thomson Reuters-West	300.51	Home Depot (Utne)	300.51
06/30/2022	Thomson Reuters-West	321.29	Home Depot (Utne)	321.29
01/05/2023	Thomson Reuters-West	Confirmation#000358233210 for Sep,Oct,Nov,I	Home Depot (Utne)	328.20
02/28/2022	Thomson Reuters-West	362.72	Home Depot (Utne)	362.72
04/30/2022	Thomson Reuters-West	371.20	Home Depot (Utne)	371.2
03/31/2022	Thomson Reuters-West	425.06	Home Depot (Utne)	425.06
01/05/2023	Thomson Reuters-West	Confirmation#000358233210 for Sep,Oct,Nov,I	Home Depot (Utne)	600.47
05/23/2019	Tribunenewsst		Home Depot (Utne)	4.84
01/31/2019	Veritext Legal Solutions	Inv. # CS3628351	Home Depot (Utne)	409.25
02/27/2019	Veritext Legal Solutions	Inv. # CS3670837	Home Depot (Utne)	424.00
05/07/2019	Veritext Legal Solutions	Inv. # CS3740794	Home Depot (Utne)	487.20
03/01/2019	Veritext Legal Solutions	Inv. # CS3677644	Home Depot (Utne)	487.35
03/12/2019	Veritext Legal Solutions	Inv. # CS3689078	Home Depot (Utne)	497.25
03/19/2019	Veritext Legal Solutions	Inv. # CS3688723	Home Depot (Utne)	546.00
03/12/2019	Veritext Legal Solutions	Inv. # CS3688048	Home Depot (Utne)	549.25
03/08/2019	Veritext Legal Solutions	Inv. # CS3683897	Home Depot (Utne)	571.90
03/29/2019	Veritext Legal Solutions	Inv. # CS3688724	Home Depot (Utne)	603.55
03/12/2019	Veritext Legal Solutions	Inv. # CS3679750	Home Depot (Utne)	604.85
03/19/2019	Veritext Legal Solutions	Inv. # CS3693869	Home Depot (Utne)	623.00
03/29/2019	Veritext Legal Solutions	Inv. # CS3690793	Home Depot (Utne)	655.65
02/27/2019	Veritext Legal Solutions	Inv. # CS3662380	Home Depot (Utne)	700.90
05/07/2019	Veritext Legal Solutions	Inv. # CS3756188	Home Depot (Utne)	772.99
01/22/2019	Veritext Legal Solutions	Inv. # CS3621845	Home Depot (Utne)	834.60
02/08/2019	Veritext Legal Solutions	Inv. # CS3625917	Home Depot (Utne)	887.75
02/08/2019	Veritext Legal Solutions	Inv. # CS3644548	Home Depot (Utne)	923.60
01/31/2019	Veritext Legal Solutions	Inv. # CS3634470	Home Depot (Utne)	937.65
02/08/2019	Veritext Legal Solutions	Inv. # CS3637706	Home Depot (Utne)	959.45
02/27/2019	Veritext Legal Solutions	Inv. # CS3654023	Home Depot (Utne)	987.90
12/26/2018	Veritext Legal Solutions	John Utne, job # 3154350	Home Depot (Utne)	1,297.05
02/08/2019	Veritext Legal Solutions	Inv. # CS3619072	Home Depot (Utne)	1,490.90
03/30/2018	Vicki Eastvold, RMR, CRR	Inv.# 201800021	Home Depot (Utne)	2.70
03/07/2018	Vicki Eastvold, RMR, CRR	Transcript Deposit	Home Depot (Utne)	40.50
12/13/2018	Willow Crk Grl SFO TRM		Home Depot (Utne)	22.02
01/29/2019	Zach Hill	reimbursement for deposition	Home Depot (Utne)	153.00
			<b>Total Other</b>	<b>54,185.31</b>

Total Home Depot (Utne)

**2,465,938.94**