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Attorneys for Plaintiffs and the Class

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

CAT BROOKS and RASHEED SHABAZZ, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

THOMSON REUTERS CORPORATION,

Defendant.

Case No. 3:21-cv-1418-EMC-KAW

DECLARATION OF ANDRE MURA AND GEOFFREY GRABER IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS

Date: February 13, 2024
Time: 1:30 p.m.
Place: Courtroom 5, 17th Floor
Judge: Hon. Edward M. Chen

Plaintiffs' counsel Andre Mura of Gibbs Law Group LLP and Geoffrey Graber of Cohen Milstein Sellers & Toll PLLC, declare under penalty of perjury:

1. Andre Mura and Geoffrey Graber represent Plaintiffs in this certified class action and respectfully submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Service Awards. We have personal knowledge of the facts set forth below and if called as witnesses, could and would testify competently to them.

Complaint Allegations

2. This case arises from allegations concerning Thomson Reuters' operation of its online platform CLEAR. Plaintiffs allege that, through its "public records platform" CLEAR, Thomson Reuters offers customers access to information about individuals across the United States, including Californians. ECF No. 148-2 at 2.

3. Plaintiffs' allegations detail that Thomson Reuters licenses access to large volumes of information to power CLEAR from third party data providers. *Id.*at 2-6. It takes this information, processes it, and creates "reports" on individuals, reports that can contain a huge array of personal details about any particular Californian. *Id.* Some of the data is otherwise public, and some of the data is not. *Id.* at 2.

Class Counsel's Work in Securing the Proposed Settlement

4. During this litigation, our firms extensively investigated the facts, aggressively litigated the case, and developed a strong understanding of the strengths and weaknesses and value of the claims. This research included review of publicly available information regarding the industry and consultation with investigators.

5. On December 3, 2020, Plaintiffs filed a putative class action complaint against Thomson Reuters on behalf of Californians whose personal information was made available through CLEAR. The complaint asserted that Thomson Reuters' compilation and sale of access to Californians' personal information without their consent violated state privacy and consumer protection law and unjustly enriched Thomson Reuters. ECF No. 1-1.

6. Thomson Reuters responded to the complaint by moving to dismiss. After full briefing and oral argument, the Court granted and denied the motion in part. ECF No. 54.

The Court dismissed Plaintiffs' claims under California's right of publicity (statutory and common law), and Plaintiffs' claim for violations of the "unlawful" prong of California's Unfair Competition Law. *Id.* The Court permitted Plaintiffs' claim for injunctive relief for violations of the "unfair" prong of the UCL to proceed, along with a claim for unjust enrichment. *Id.*

7. Thomson Reuters then answered Plaintiffs' complaint in September 2021. ECF No. 60.

8. Plaintiffs filed an amended complaint conforming to the Court's motion to dismiss, and moved for certification of their remaining claims. ECF Nos. 123, 130. Both parties prepared extensive expert testimony regarding class certification, and challenged the admissibility of the opposing party's experts. ECF No. 201.

9. In May and July 2023, the Court denied both parties' motions to exclude the other's experts, and granted Plaintiffs' Motion for Class Certification. ECF Nos. 206, 213. The Court found that Plaintiffs had shown that their "right to control" theory showed a traceable and redressable injury in fact, and that Plaintiffs' remaining claims satisfied the requirements of Rule 23(a) and 23(b), certifying both of Plaintiffs' claims under Rule 23(b)(3), and additionally certifying Plaintiffs' claim for injunctive relief under California's UCL under Rule 23(b)(2). ECF No. 213.

10. Thomson Reuters petitioned the Ninth Circuit for interlocutory review of the Court's class certification order, ECF No. 223, which Plaintiffs opposed. The Ninth Circuit denied Thomson Reuters' motion. ECF No. 228.

11. Thus, at the time the parties subsequently reached a settlement, many of the issues of law had been thoroughly briefed, vetted, and aired. The parties, therefore, had a strong understanding of the legal issues and causes of action—framed by this Court's decisions and the Ninth Circuit's—involved in this case.

12. At the time the parties reached a settlement, Plaintiffs had served nine comprehensive sets of Request for Production of Documents on Thomson Reuters ("RFPs"). Thomson Reuters provided responses to these ninety-seven RFPs, and indeed, as a result of

extensive meeting and conferring between the parties, served many amended, supplemental responses to take into account any agreements reached during the meet and confer process and to conform the responses to the agreements reached regarding Thomson Reuters' objections.

13. As a result of these considerable efforts, by the time of settlement, Thomson Reuters had produced nearly 80,000 documents, totaling nearly 500,000 pages.

14. Plaintiffs also served, and received responses to, several comprehensive sets of Interrogatories (totaling twenty-three in number). After extensive meeting and conferring, Thomson Reuters agreed to amend its responses multiple times to provide supplemental information important to Plaintiffs' case.

15. Plaintiffs also served, and received responses to, sixty-five requests for admission. In addition, Plaintiffs took seven fact depositions, three expert depositions, and deposed Thomson Reuters pursuant to Rule 30(b)(6).

16. Plaintiffs also engaged in discovery motion practice before this Court, and later, the Honorable Magistrate Judge Kandis A. Westmore. ECF Nos. 82, 96. For example, this Court heard and ruled upon a dispute regarding Thomson Reuters' production of its data licensing agreements. ECF No. 82. This was critical, because the licensing agreements would set out the universe of information available through CLEAR, and the entities that supplied the data Thomson Reuters made available through its platform.

17. The parties also briefed issues relating to Plaintiffs' ability to access and review the CLEAR platform, and to Thomson Reuters' obligations to produce supplemental information as the case proceeded. ECF Nos. 120, 212.

18. Plaintiffs also responded to extensive discovery requests from Thomson Reuters. Thomson Reuters served twenty-three interrogatories and fifty-eight RFPs. Named Plaintiffs Cat Brooks and Rasheed Shabazz collected nearly 700,000 documents for Plaintiffs' counsel to review in response to these discovery requests, and ultimately produced more than 40,000 pages of responsive information. Plaintiffs' counsel worked closely with both

Named Plaintiffs to prepare responses to this written discovery, and to review and produce the responsive information Thomson Reuters sought.

19. Thomson Reuters also deposed both Plaintiffs, each of whom spent time with counsel preparing to testify.

20. Beyond fact discovery, the parties completed expert discovery related to class certification (with Plaintiffs propounding two expert reports, and Thomson Reuters three). Plaintiffs' testifying experts at class certification were: Joseph Turow, Ph.D., a renowned privacy scholar and the Robert Lewis Shayon Professor of Communication at the Annenberg School for Communication at the University of Pennsylvania, and Terry Lloyd, CPA, CFA, the Managing Director of Finance Scholars Group, Inc. ECF Nos. 206, 213.

21. Plaintiffs deposed Thomson Reuters' three class certification rebuttal experts.

22. Thomson Reuters also deposed both of Plaintiffs' class certification experts.

23. Further, Plaintiffs briefed and argued class certification and *Daubert* as it related to the parties' class certification experts and rebuttal experts. After obtaining class certification, Plaintiffs opposed Thomson Reuters' appeal to the Ninth Circuit pursuant to Fed. R. Civ. P. 23(f).

24. The parties also prepared and exchanged merits expert reports, with Plaintiffs preparing five primary expert reports for trial, and Thomson Reuters preparing three more. Rebuttal and reply merits expert reports were scheduled to be prepared, but the settlement obviated the need for further expert discovery.

25. Plaintiffs' testifying experts on the merits were: Professor Turow; Mr. Lloyd; Sarah Lamdan, J.D., the Deputy Director of the American Library Association (and a former professor at CUNY School of Law); Becky Yoose, CIPP/US, CIPT, a library scientist and data privacy consultant and the founder of LDH Consulting Services; and Sarah Butler, MA, the Senior Managing Director of National Economic Research Associates, Inc.

26. Class Counsel also engaged in extensive, arms' length settlement discussions with Thomson Reuters before class certification and after. In particular, after class certification, the parties held in-person meetings, video meetings, exchanged mediation

statements, and exchanged settlement proposals. The proposed settlement was arrived at only after both sides had the opportunity to be fully informed of the relative strengths and weaknesses of their positions, litigation risks, and issues involving ability to pay. Settlement was only reached after discovery was essentially complete in this action.

27. We and members of our respective law firms have been intimately involved in this case. Gibbs Law Group LLP and its attorneys and staff have worked on this case since before it was filed on December 3, 2020. Cohen Milstein Sellers Toll PLLC and its attorneys and staff have worked on this case since October 2022. In addition, attorneys at Gupta Wessler LLP, Justice Catalyst, and the Surveillance Technology Oversight Project (S.T.O.P.), who also represent the named plaintiffs, worked to develop the case and assisted at various points with the litigation, though neither Justice Catalyst nor S.T.O.P. is applying for fees from the common fund.

28. Through this litigation, Class Counsel have faced substantial risks, including:

a. The risk of litigating against one of the largest and most sophisticated law firms in the world with access to seemingly limitless resources.

b. The risk that the novel complaint would not withstand the motion to dismiss.

c. The risk that Defendant would, and in fact has, vehemently contested Plaintiffs' claims.

d. The risk that Defendant would prevail on its arguments at any phase of this litigation.

e. The risk of not achieving class certification.

f. The changing landscape of the law with respect to proving damages and class actions generally.

g. The risk of an unfavorable ruling at summary judgment eliminating one or both of Plaintiffs' remaining claims.

h. The risk that Plaintiffs' novel legal claims, even if successful at trial, would be overturned on appeal.

Attorneys' Fees

29. The hourly rates for the attorneys, paralegals, and law clerks at Gibbs Law Group are as follows: partner hourly rates range from $730 to $915; counsel hourly rates range from $795 to $850; associate hourly rates range from $445 to $665; and litigation assistants' rates range from $220 to $240. The total number of hours spent by Gibbs Law Group during the relevant time period based on contemporaneous time records is **7,331.2** hours, with a corresponding lodestar of **$4,543,362.50**. This does not include any attorneys and staff who billed less than 50 hours, and it does not include the work of contract attorneys who assisted in document review, which totals 1,444.40 hours. Courts have accepted the rates of Gibbs Law Group LLP attorneys in this District, including in *In Re: Robinhood Outage Litig.*, No. 3:20-cv-01626-JD, ECF No. 191-6 at Ex. A (N.D. Cal. Mar. 27, 2023) (reporting $835 per hour for Mura; $775 per hour for Troutman), ECF No. 203 at ¶ 7 (N.D. Cal. Jul. 28, 2023) (finding rates reasonable); *In re Zoom Video Commc'ns, Inc. Priv. Litig.*, No. 3:20-cv-02155-LB, 2022 WL 1593389, at *11 (N.D. Cal. Apr. 21, 2022) (accepting rates of Andre Mura, Amanda Karl, and Jeff Kosbie as reasonable), ECF No. 218-5 at 6 (N.D. Cal. Jan. 28, 2022) (reporting $775 per hour for Mura; $465 per hour for then-associate Karl; and $510 for Kosbie); *Tyler Barnett PR, LLC v. Facebook, Inc.*, No. 4:16-cv-06232-JSW, ECF Nos. 204-3 at 2 (N.D. Cal. Jan. 15, 2020) (reporting $710 per hour for Stein), 211 at 4 (N.D. Cal. June 26, 2020) (finding rates reasonable).

Timekeeper	Title	Years of Practice	Rate	Hours	Lodestar
Brooks, Delaney	Associate	2	$445	145.6	$64,792.00
Graham, Kristy	Counsel	20	$795	77.4	$61,533.00
Jensen, Hanne	Associate	4	$490	740.5	$362,845.00

Karl, Amanda	Partner	9	$730	102.2	$74,606.00
Kincaid, Lindsey	Litigation Assistant	N/A	$240	92.6	$22,224.00
Kosbie, Jeff	Associate	8	$665	168.6	$112,119.00
Mura, Andre	Partner	19	$915	1,095.3	$1,002,199.50
Norton, Gillian	Litigation Assistant	N/A	$220	153.8	$33,836.00
Stein, Dave	Partner	15	$895	129.5	$115,902.50
Troutman, Mark	Counsel	20	$850	938.6	$797,810.00
Wald, Zeke	Associate	3	$490	3,467.8	$1,699,222.00
Zeman, Amy	Partner	13	$895	219.3	$196,273.50
Total:				**7,331.2**	**$4,543,362.50**

30. The hourly rates for the attorneys, paralegals, and law clerks at Cohen Milstein Sellers & Toll PLLC are as follows: partner hourly rates range from $980 to $1050; associate hourly rates are $675; investigator hourly rates are $645; and paralegal hourly rates are $380. The total number of hours spent by Cohen Milstein during the relevant time period based on contemporaneous time records is **1,396.2** hours, with a corresponding lodestar of **$910,525.00.** Courts that have accepted the rates of Cohen Milstein Sellers & Toll attorneys include: *Prescott v. Reckitt Benckiser LLC,* 5:20-cv-02101 (N.D. Cal.), ECF Nos. 197-1 at 4 (setting out billing rates), 201 at 2 (approving fee request); *Ariza et al v. Luxottica Retail North America*, 1:17-cv-05216 (E.D.N.Y.), ECF Nos. 356-1 at 3-4 (setting out billing rates), 375 at 29 (approving fee request).

Timekeeper	**Title**	**Years of Practice**	**Rate**	**Hours**	**Lodestar**
Clarke, Suzanne	Investigator	N/A	$645	1.3	$838.50
Graber, Geoffrey	Partner	24	$1,050	117.5	$123,375.00

Hamdan, Shireen	Paralegal	N/A	$380	8	$3,040.00
Horowitz, Jennifer E.	Paralegal	N/A	$380	308.7	$117,306.00
McCubbin, Erin	Paralegal	N/A	$380	12.3	$4,674.00
Nugent, Victoria S.	Partner	25	$980	91.4	$89,572.00
Puttieva, Karina	Associate	7	$675	834.1	$563,017.50
Shea, Caitlin	Paralegal	N/A	$380	22.9	$8,702.00
Total:				**1396.2**	**$910,525.00**

31. The hourly rates for the two attorneys at Gupta Wessler LLP who worked on this case are: $1,100 for a principal (partner) who is the head of the San Francisco office; and $800 for an associate with ten years of experience. In this case, however, Gupta Wessler is requesting a discounted hourly rate of $915 for the partner, and $665 for the associate, consistent with the rates of other partners and associates in this litigation and in this District. The total number of hours spent by Gupta Wessler during the relevant time period based on contemporaneous time records is **124** hours, with a corresponding lodestar of **$105,760.00.**

Timekeeper	**Title**	**Years of Practice**	**Rate**	**Hours**	**Lodestar**
Jennifer Bennett	Principal	10	$915	93.2	$85,278.00
Neil Sawhney	Associate	10	$665	30.8	$20,482.00
Total:				**124.0**	**$105,760.00**

32. The total hours spent across Gibbs Law Group LLP, Cohen Milstein Sellers & Toll PLLC, and Gupta Wessler LLP during this litigation to date is **8,851.4**, with a corresponding lodestar of **$5,559,647.50**. The following table reflects the breakdown of these

total hours across 14 task code categories, which are modeled on the categories adopted in *In re: Soc. Media Adolescent Addiction/Pers. Injury Prods. Liab. Litig.*, No. 22-md-03047-YGR (N.D. Cal. Mar. 15, 2023), ECF No. 190 at Ex. A. Those categories are as follows:

a. "Case management duties" covers the general administrative leadership responsibilities associated with organizing and managing this litigation, such as preparing case management statements.

b. "Leadership calls and meetings" covers contemporaneous meetings between lead counsel and supporting counsel directing the litigation.

c. "Administrative" covers organizational tasks such as monitoring expenses and updating calendars.

d. "Court appearances and preparation" covers counsel's time preparing for and attending hearings.

e. "Pleadings/briefing/pre-trial motions/legal memoranda" covers research and drafting time spent for specific pleadings, briefs, motions, or similar legal writing, time spent reviewing, analyzing, and summarizing filings and orders of the Court, and similar legal research and writing tasks. This includes, for example, preparing memoranda on class certification issues, drafting and editing the class certification brief, researching and writing specific discovery briefs, and so on.

f. "Research" covers legal research time that is cross-category and not specifically affiliated with a specific in-progress brief, filing, or memorandum.

g. "Litigation strategy and analysis" covers time spent on strategy and analysis to support the advancement of the case, including on the merits and class certification.

h. "Document review and analysis" covers review of document discovery produced in this litigation and analysis as to the import of that documentary evidence.

i. "Discovery" covers most discovery related tasks, including discovery for class certification and the merits

j. "Experts" covers communication with and retention of experts, time spent on expert reports and expert discovery (documentary and depositions), and time spent working with experts preparing for *Daubert* briefing and hearings, and the like.

k. "Settlement" covers strategic discussions between counsel regarding settlement, participation in mediations and drafting mediation statements, preparation of term sheets and a master settlement agreement, discussions with the settlement administrator, preparation of class notice, and so on.

l. "Trial preparation" covers time spent preparing for trial in this litigation.

m. "Appeal" covers tasks related to appeals, including time spent reviewing and opposing Thomson Reuters' 23(f) appeal of the Court's order granting class certification.

n. "Miscellaneous" covers time that could not be accurately categorized into one of the more specific categories described above.

33. The breakdown per category across all firms is as follows:

Task	**Hours Spent**	**Lodestar**
Case management duties	13.6	$11,888.50
Leadership calls/meetings	66.5	$44,645.50
Administrative	36	$18,001.00
Court appearances	62.7	$49,638.50
Pleadings/briefing/pre-trial motions/legal memoranda	1,844.1	$1,098,397.00
Research	307.5	$159,306.00
Litigation strategy & analysis	201.6	$150,665.50

Document review & analysis	537.5	$288,047.00
Discovery	3,244.9	$2,123,816.00
Experts	1,886.2	$1,144,871.50
Settlement	615.7	$446,074.50
Trial preparation	0	$0
Appeal	35.1	$24,296.50
Miscellaneous	0	$0
Total:	**8,851.4**	**$5,559,647.50**

34. The breakdown per biller per law firm is provided below in **Exhibit 1**.

Costs and Expenses

35. The total unreimbursed costs and expenses incurred during this litigation are **$670,885.29**. Co-Lead Counsel have previously submitted a breakdown of these costs into particular cost categories to the Court. ECF No. 250 at 6. We provide here an updated summary of unreimbursed costs and expenses for the Court's review.

Total Accounting	**Expenses**
Discovery Vendor	$ 187,348.50
Experts	$ 268,033.75
Mediation	$ 106,853.00
Westlaw / Case Research	$ 25,994.42
Depositions	$ 57,334.97
Copying and service delivery charges	$ 4,052.55
Travel & hotels	$ 19,345.44
Filing, Pacer, and document download fees	$ 456.08
Meals	$ 1,466.58
Total	**$ 670,885.29**

36. The costs and expenses incurred in this action were advanced by Gibbs Law Group LLP in the amount of **$358,949.17**, Cohen Milstein Sellers & Toll PLLC in the amount of **$201,758.12**, and Justice Catalyst, in the amount of **$110,178.00**. Receipts are available upon the Court's request.

We declare under penalty of perjury that the foregoing is true and correct to the best of our knowledge. Executed on October 25, 2024.

/s/ Andre M. Mura
Andre M. Mura
Gibbs Law Group LLP

/s/ Geoffrey Graber
Geoffrey Graber
Cohen Milstein Sellers & Toll PLLC

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatory.

/s/ *Andre M. Mura*

EXHIBIT 1

Category Codes

(1) Case management duties	(2) Leadership calls/meetings	(3) Administrative	(4) Court Appearances & Preparation
(5) Pleadings/briefing/pre-trial motions/legal memoranda	(6) Research	(7) Litigation strategy & analysis	(8) Document review & analysis
(9) Discovery	(10) Experts	(11) Settlement	(12) Trial Preparation
(13) Appeal	(14) Miscellaneous		

Name	Title (Years)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total	Rate	Lodestar
Brooks, Delaney	Associate (2)	0.0	0.0	0.0	0.0	127.3	11.2	0.0	0.0	7.1	0.0	0.0	0.0	0.0	0.0	145.6	$445	$64,792.0
Graham, Kristy	Counsel (20)	0.0	0.0	0.0	0.0	51.5	0.0	0.0	0.0	25.9	0.0	0.0	0.0	0.0	0.0	77.4	$795	$61,533.0
Jensen, Hanne	Associate (4)	0.0	20.8	0.1	2.3	261.4	19.8	32.9	0.1	123.0	263.6	16.5	0.0	0.0	0.0	740.5	$490	$362,845.0
Karl, Amanda	Partner (9)	0.0	0.0	0.1	0.0	75.9	17.5	0.2	0.0	8.5	0.0	0.0	0.0	0.0	0.0	102.2	$730	$74,606.0
Kincaid, Lindsey	Litigation Assistant	0.0	0.0	5.3	0.0	2.0	0.0	0.0	46.0	13.1	22.9	3.3	0.0	0.0	0.0	92.6	$240	$22,224.0
Kosbie, Jeff	Associate (8)	0.0	4.4	0.3	2.2	43.7	0.0	0.0	0.0	118.0	0.0	0.0	0.0	0.0	0.0	168.6	$665	$112,119.0
Mura, Andre	Partner (19)	9.4	10.0	3.5	42.6	234.4	2.3	87.9	1.2	336.8	143.5	215.9	0.0	7.8	0.0	1095.3	$915	$1,002,199.5
Norton, Gillian	Litigation Assistant	0.0	0.0	0.0	0.0	0.0	0.0	0.0	104.1	34.0	15.7	0.0	0.0	0.0	0.0	153.8	$220	$33,836.0
Stein, Dave	Partner (15)	0.0	0.0	0.0	0.0	1.7	0.0	3.7	0.0	51.0	73.1	0.0	0.0	0.0	0.0	129.5	$895	$115,902.5
Troutman, Mark	Counsel (20)	0.0	0.5	0.0	0.0	46.2	12.7	0.0	152.6	670.4	47.4	8.8	0.0	0.0	0.0	938.6	$850	$797,810.0
Wald, Zeke	Associate (3)	0.0	3.6	4.1	13.3	868.8	196.7	30.7	190.7	1173.3	724.3	252.9	0.0	9.4	0.0	3467.8	$490	$1,699,222.0
Zeman, Amy	Partner (13)	0.0	1.3	3.0	0.0	10.2	0.0	0.0	0.0	34.5	165.1	5.2	0.0	0.0	0.0	219.3	$895	$196,273.5
Clarke, Suzanne	Investigator	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	0.5	0.0	0.0	0.0	0.0	1.3	$645	$838.5
Graber, Geoffrey	Partner (24)	0.8	2.6	0.0	0.0	0.0	0.0	2.3	0.0	1.5	29.5	80.8	0.0	0.0	0.0	117.5	$1,050	$123,375.0

Hamdan, Shireen	Paralegal	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	8.0	0.0	0.0	0.0	0.0	8.0	$380	$3,040.0
Horowitz, Jennifer E.	Paralegal	0.0	4.9	17.6	0.0	4.4	34.2	2.3	0.0	110.9	133.6	0.8	0.0	0.0	0.0	308.7	$380	$117,306.0
McCubbin, Erin	Paralegal	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	12.3	0.0	0.0	0.0	12.3	$380	$4,674.0
Nugent, Victoria, S.	Partner (25)	0.5	6.6	1.0	0.0	6.4	0.0	8.1	3.0	35.1	30.7	0.0	0.0	0.0	0.0	91.4	$980	$89,572.0
Puttieva, Karina	Associate (7)	2.9	11.8	0.3	2.3	36.2	5.5	26.1	39.8	481.6	211.8	15.8	0.0	0.0	0.0	834.1	$675	$563,017.5
Shea, Caitlin	Paralegal	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	11.9	11.0	0.0	0.0	0.0	0.0	22.9	$380	$8,702.0
Bennett, Jennifer	Principal (10)	0.0	0.0	0.7	0.0	64.3	3.2	7.4	0.0	7.3	4.3	3.4	0.0	2.6	0.0	93.2	$915	$85,278.0
Sawhney, Neil	Associate (10)	0.0	0.0	0.0	0.0	9.7	4.4	0.0	0.0	0.2	1.2	0.0	0.0	15.3	0.0	30.8	$665	$20,482.0
Total:		13.6	66.5	36.0	62.7	1844.1	307.5	201.6	537.5	3244.9	1886.2	615.7	0.0	35.1	0.0	8851.4		$5,559,647.50