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13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16 BYRON MCKNIGHT, JULIAN MENA, )  
17 TODD SCHREIBER, NATE COOLIDGE, )  
18 and ERNESTO MEJIA, individually and on )  
behalf of all others similarly situated, )

19 Plaintiffs, )

20 vs. )

21 UBER TECHNOLOGIES, INC., a Delaware )  
22 Corporation; and RASIER, LLC, a Delaware )  
Limited Liability Company, )

23 Defendants. )  
24 )  
25 )  
26 )  
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28 )

Case No. 4:14-cv-05615-JST

The Honorable Jon S. Tigar

**DECLARATION OF NICHOLAS  
COULSON IN SUPPORT OF  
PLAINTIFFS' RENEWED MOTION FOR  
ATTORNEYS' FEES**

1           1.       I, Nicholas Coulson, declare as follows:

2           2.       I am an attorney licensed to practice in all courts in the State of Michigan, with a  
3 State Bar of Michigan Identification No. 78001. I practice at the law firm of Liddle & Dubin,  
4 P.C (“LD”). I was permitted to appear pro hac vice in this matter by order of the Court ([Doc.  
5 No. 43]) and appointed as Class Counsel ([Doc. No. 136]). I submit this declaration in support  
6 of Plaintiffs’ Renewed Motion for Attorneys’ Fees in this action, as a supplement to my prior  
7 declaration. ([Doc. No. 142]). The matters stated herein are true of my own knowledge or,  
8 where indicated, I am informed and believe that they are true. If called upon as a witness, I  
9 could and would competently testify as follows.

10          3.       Paragraph 17 of my prior declaration set out costs reasonably expended by my firm  
11 in prosecuting this case totaling \$20,587.66. This included \$6,216.66 in mediation costs,  
12 \$86.71 in shipping/overnight mail, and \$14,278.29 in costs related to travel.

13          4.       Pursuant to the Court’s August 13, 2019 Order ([Doc. No. 189]), I submit this  
14 declaration to provide additional detail for my firm’s claimed costs. None of the hours  
15 submitted for my firm in support of Class Counsel’s fee request were expended in preparing  
16 the current or prior fee requests.

17          5.       The requested “mediation” costs (\$6,216.66) include:

18               8/24/15 \$2,441.67 to JAMS

19               10/2/15 \$2,441.66 to JAMS

20               10/19/15 \$1,608.33 to JAMS

21               1/12/16 \$-275 **REFUND FROM JAMS**

22          6.       The requested costs (\$86.71) for shipping/overnight mail are for:

23               8/12/15 \$28.60 FEDEX overnight shipment to JAMS

24               9/30/15 \$30.06 FEDEX overnight shipment to JAMS

25               10/28/15 \$28.05 FEDEX overnight shipment to JAMS

26          7.       The requested “travel” costs in my prior declaration described that category as  
27 including airfare, lodging, transportation, parking, and meals. However, the total amount for  
28 airfare and lodging alone is **\$16,845.23**. My firm seeks no reimbursement of any other

1 category of travel expense<sup>1</sup>, and limits its request to the **\$14,278.29** set forth in my original  
 2 declaration. Many of the flight charges are relatively high because they are cross-country  
 3 flights that were largely booked on short notice, but none of the flights were first or business  
 4 class. Additionally, the hotels were non-luxury business properties; Courtyard, Marriott, and  
 5 Residence Inn. In total, there were 24 lawyer-nights of travel and 8 round trip flights.

6 Those costs are as follows:

Description	Amount
3 nights Marriott hotel LA for NAC and SDL for 8/24/15 mediation	\$2,341.84
NAC flight DTW to LAX for 8/24/15 mediation	\$771.70
SDL flight DTW to LAX for 8/24/15 mediation	\$956.20
2 nights Courtyard hotel in Los Angeles for NAC and SDL for 10/2/15 mediation	\$1037.65
NAC flight DTW to LAX for 10/2/15 mediation	\$966.20
SDL flight ORD-LAX-DTW for 10/2/15 mediation	\$1,244.20
2 nights Residence Inn LA hotel for NAC for 10/30/15 mediation	\$357.36
NAC flight DTW to LAX for 10/30/15 mediation	\$669.20
NAC flight DTW to SFO for Nov. 2015 Uber employee interviews	\$1,012.70
NAC Courtyard hotel in San Francisco 6 nights for Nov. 2015 Uber employee interviews	\$2,315.33
2 nights Courtyard hotel in LA for NAC for 10/5/16 mediation	\$1036.41
NAC flight DTW to LAX for 10/5/16 mediation	\$1,270.20
2 nights Marriott hotel in San Diego for NAC for 11/22/16 mediation	\$340.57
NAC flight DTW to SAN for 11/22/16 mediation	\$1,178.20
NAC flight DTW to SFO for 1/5/17 mediation	\$804.20
2 nights Marriott hotel in San Francisco for NAC for 1/5/17 mediation	\$543.27
<b>TOTAL AIRFARE:</b>	<b>\$8,872.80</b>
<b>TOTAL LODGING:</b>	<b>\$7,972.43</b>
<b>TOTAL TRAVEL:</b>	<b>\$16,845.23</b>

26 <sup>1</sup> Because some flight and lodging expenses were inadvertently not included my prior declaration,  
 27 we have determined to omit any request for other expenses and cap our cost request at the original  
 28 amount. For the sake of completeness and transparency, I set forth the entirety of the hotel and  
 lodging expenses.

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I declare under penalty of perjury under the laws of California and of the United States that the foregoing is true and correct. Executed this 10<sup>th</sup> day of February, 2020 in Detroit, Michigan.



Nicholas A. Coulson