

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

BARBARA CRAW, <i>et al.</i> ,	X	
	X	
Plaintiffs,	X	CASE NO: 18-CV-12149-LTS
	X	
vs.	X	
	X	
HOMETOWN AMERICA, LLC, <i>et al.</i> ,	X	
	X	
Defendants.	X	
	X	

SUPPLEMENTAL DECLARATION OF ETHAN R. HOROWITZ

I, Ethan R. Horowitz, state that the following facts are true and accurate, based on my personal knowledge, and that I am competent to testify to the truth and accuracy of the same:

1. I have been a member in good standing of the Bar of the Commonwealth since 2009, membership which I obtained following my studies at Harvard Law School – where I earned my *juris doctor* degree in 2008 – and following a federal judicial clerkship with the Hon. Roslyn O. Silver of the U.S. District Court for the District of Arizona.

2. Prior to my current employment, I held various positions in private practice and, during my most recent private-sector employment, billed at a rate of \$250 per hour.

3. At present, I am Managing Director of the Northeast Justice Center – a position which I have held since 2015 – and have acted as lead counsel for the putative class in the above-referenced action since it was initiated.

4. The Northeast Justice Center is a civil legal aid organization and thus I do not charge an hourly rate to clients but rather collect fees, to the extent they are collected at all, directly from opposing parties or through a 25% contingency fee arrangement with clients.

5. On September 25, 2018, Ms. Craw commenced the instant action before the Superior Court of Plymouth County, Massachusetts and challenged the lawfulness of the maintenance policies at the Oakhill and Oak Point Manufactured Housing Communities; Ms. Craw was at that time and still is a resident of Oakhill.

6. Shortly thereafter, Ms. Craw served upon defense counsel her first motion for class certification.

7. On October 31, 2018, after the instant action was removed to this Court, Ms. Craw filed an amended complaint so as to conform her claims to the federal forum and to add the claims of her co-Plaintiff Joan Shurtleff who at that time was, and still is, a resident of Oak Point.

8. Ms. Craw and Ms. Shurtleff subsequently filed a second motion for class certification which was denied without prejudice, opposed a motion to dismiss which was denied in its entirety and twice moved affirmatively for partial summary judgment – both of which motions were denied without prejudice.

9. Following this flurry of motion practice, the parties by agreement spent the next eleven months conducting discovery on Ms. Craw's and Ms. Shurtleff's individual claims – discovery which included Plaintiffs' production of approximately 8,000 pages of documents, Defendants' production of approximately 70,000 pages of documents, nine depositions – three noticed by Defendants and six by Plaintiffs – and more than one-dozen business record subpoenas or public record requests to third parties.

10. In March of 2020, following the conclusion of discovery, as well as additional discovery-related and other motion practice, the parties successfully sought a stay of the pending litigation and began settlement negotiations mediated by mediation attorney John J. Perry, Jr.

11. After approximately one year of extensive arm's-length negotiations, which included the disclosure of informal discovery, Ms. Craw and Defendants Hometown America, LLC, Hometown America Management, LLC and Hometown Oakhill, LLC ("Oakhill Defendants") reached a proposed agreement designed to resolve Craw's claims in the above-captioned litigation.

12. One of the items of informal discovery disclosed to Ms. Craw by the Oakhill Defendants during, and supplemented after, these negotiations was an estimated count of over 500 current and former Oakhill residents who had resided in that community since September of 2012.

13. During the course of this litigation, Ms. Craw assisted me in responding to substantial amounts of written discovery propounded by Defendants and concerning Craw or Oakhill, written discovery which resulted in the production of over 900 pages of documents.

14. During the course of this litigation, Ms. Craw spent an entire day at a deposition in defense counsel's office in downtown Boston, where she testified for approximately six hours.

15. During the course of this litigation, Ms. Craw cooperated with defense counsel's request that a panel of experts be permitted to inspect her home and made her home as well as home site available to those six experts.

16. During the course of this litigation, Ms. Craw assisted me with organizing at least one Oakhill residents meeting at which I presented, among other things, information about the status of the above-captioned action.

17. Following the Court's preliminary approval of the proposed settlement, Ms. Craw spent no fewer than two days with interns from the my office knocking on the doors of Oakhill residents, answering questions about the proposed settlement and ensuring that all Oakhill

residents had the information they needed to make an informed decision about their rights in the instant litigation.

18. During both my time as Managing Director and in private practice, I have represented clients in multiple class-action litigations, including three other manufactured housing class actions which I successfully prosecuted on behalf of the plaintiff class:

- a. *Reid, et al. v. Neighborhood Assistance Corp. of Am.*, as defense counsel, 2011-CH-37979 (Circuit Court of Cook County) 16-0296 (App. Ct. of Ill. 1st Dist.)
- b. *Lannan, et al. v. Levy & White, et al.*, as class counsel, 14-CV-13866-IT (D. Mass.)
- c. *Layes, et al. v. RHP Properties, Inc., et al.*, as class counsel 15-CV-2722 (Middlesex Super. Ct.) 18-P-218 (Mass. App. Ct.) 20-CV-10721 (D. Mass.)
- d. *Currie, et al. v. RHP Properties, Inc., et al.*, as class counsel 17-CV-1055 (Middlesex Super. Ct.)
- e. *Baldwin, et al. v. RHP Properties, Inc., et al.*, as class counsel 18-CV-849 (Middlesex Super. Ct.)

19. The most recent reasonable hourly rate for which I have received judicial approval is \$340 per hour, a rate which was approved by the Middlesex Superior Court in the *Layes, et al. v. RHP Properties, Inc., et al.* manufactured housing community class-action litigation. *See* 15-CV-2722 (Middlesex Super. Ct.) at Doc. Nos. 70-71.

20. Based on the above-described experience, I believe that the proposed settlement reached by Ms. Craw and the Oakhill Defendants is a resolution that is fair, reasonable and adequate to the current and former residents of Oakhill who would be bound by the settlement.

21. During the course of this litigation, I maintained time records in the normal course of my duties as the Managing Director of the Justice Center, records which I kept in good faith

and which I created both routinely as well as contemporaneously with the conduct described in each record – or within a reasonable time thereafter (“Time Records”).

22. Upon review of the Time Records corresponding to the above-captioned matter, I have determined that I spent no fewer than 36 hours on tasks involving Ms. Craw’s compliance with her written discovery obligations – tasks which generally included reviewing Ms. Craw’s documents, disclosing those documents to defense counsel through Plaintiffs’ multiple document productions, drafting Ms. Craw’s written discovery responses as well as reviewing those responses with her and communicating with defense counsel concerning the same. Attached hereto as **Exhibit A** is an excerpted copy of said Time Records as they pertain to these tasks. None of this time was submitted by me through a prior fee petition, in the above-captioned action or any other action.

23. Upon review of the Time Records corresponding to the above-captioned matter, I have determined that I spent no fewer than 19 hours on tasks involving Ms. Craw’s deposition – tasks which generally included reviewing documents in anticipation of the deposition, conducting preparation sessions with Ms. Craw, attending the deposition itself and reviewing the transcript with Ms. Craw. Attached hereto as **Exhibit B** is an excerpted copy of said Time Records as they pertain to these tasks. None of this time was submitted by me through a prior fee petition, in the above-captioned action or any other action.

24. Upon review of the Time Records corresponding to the above-captioned matter, I have determined that I spent no fewer than 22 hours on tasks involving the deposition of former Oakhill Community Manager Josephine Santa Fe – tasks which generally included reviewing documents in anticipation of the deposition, outlining the deposition questions, taking the deposition itself and reviewing the transcript. Attached hereto as **Exhibit C** is an excerpted copy

of said Time Records as they pertain to these tasks. None of this time was submitted by me through a prior fee petition, in the above-captioned action or any other action.

25. Upon review of the Time Records corresponding to the above-captioned matter, I have determined that I spent no fewer than 31.75 hours on tasks involving the expert review of conditions at Ms. Craw's home site or at Oakhill – tasks which generally included communicating with Ms. Craw about conditions at her leased home site, communicating with defense counsel concerning conditions at Ms. Craw's home site, attending site visits at Ms. Craw's home site with Defendants' experts – either outside the scope of discovery or pursuant to F.R.C.P. 34, reviewing the resultant expert reports and communicating with Ms. Craw or defense counsel about the content of the same and communicating with Plaintiffs' consulting experts about Ms. Craw's home site as well as discussing their findings with Ms. Craw. Attached hereto as **Exhibit D** is an excerpted copy of said Time Records as they pertain to these tasks that has been redacted to protect litigation work product related to interactions with one or more consulting experts. None of this time was submitted by me through a prior fee petition, in the above-captioned action or any other action.

26. Upon review of the Time Records corresponding to the above-captioned matter, I spent no fewer than 158.25 hours associated with arranging a settlement on behalf of Ms. Craw as well as current and former Oakhill residents – tasks which generally included negotiating with defense counsel and the mediator, researching legal issues related to the settlement agreement, drafting and revising the settlement agreement as well as corresponding exhibits, preparing settlement approval motion practice and conducting outreach directed at class members. Attached hereto as **Exhibit E** is an excerpted copy of said Time Records as they pertain to these

tasks. None of this time was submitted by me through a prior fee petition, in the above-captioned action or any other action.

27. During the course of this litigation, I maintained expense records in the normal course of my duties as the Managing Director of the Justice Center concerning costs incurred in the prosecution of the above-captioned action (“Expense Records”).

28. Upon review of the Expense Records corresponding to the above-captioned matter, I have determined that my office incurred \$1,000.33 in expenses related to taking the deposition testimony of Oakhill Community Manager Josephine Santa Fe – expenses which consisted of tendering to Ms. Santa Fe her witness fee and mileage reimbursement as well as purchasing a transcript of Santa Fe’s deposition testimony from the court reporter. Attached as **Exhibit F** are true and correct copies of Expense Records pertaining to those expenditures.

29. Upon review of the Expense Records corresponding to the above-captioned matter, I have determined that my office incurred \$1,025.95 in expenses related to taking the deposition testimony of Barbara Crow – expenses which consisted of purchasing a transcript of Ms. Crow’s deposition testimony from the court reporter. Attached as **Exhibit G** is a true and correct copy of the Expense Records pertaining to that expenditure.

I affirm that the foregoing is true and accurate, to the best of my personal knowledge, and do so under the pains and penalties of perjury. Executed this 25th day of August, 2021, by:

/s/ Ethan R. Horowitz

Ethan R. Horowitz

EXHIBIT A

DATE	DESCRIPTION	HOURS
3/5/19	Revise supp mem (1.25); review client docs from 2/15 mtg (.25)	0.25
4/10/19	Draft, revise and circulate proposed R.16 motion (2.25); assemble Crow emails for doc prod (1.25)	1.25
4/26/19	Client emails re R.34 doc prod (.25); finish draft of SJ MOL (3)	0.25
4/28/19	client mtg (.25); review case law re FRE 407 and FRER 801 (1)	0.25
5/6/19	Client phone call (.25); review client docs for second prod (2.25); begin drafting R.34 responses and objections (2.25); review HTA amended R.26 disclosures and doc prod (1.5)	4.75
5/8/19	Continue preparing doc prod and revise R.34 answ/objections	4.75
5/9/19	client phone call (.25); review tax priv and work prod caselaw (.25); finalize doc prod (3.25); revise and finalize R.34(b) papers (2.25); review amended R.26(a) disclosures and email HTA counsel re same (.25)	2.50
5/21/19	Begin drafting rog responses (1.75); draft SJ reply (.5); research R.26(a) issues (1); draft LR 37.1 email (.5)	1.75
5/22/19	client phone call (.5); prep for opposing counsel call (.25); opposing counsel call re. R.26 disclosures and SJ reply (.25); continue drafting rog responses (1.5)	2.00
5/23/19	Finalize first draft of rog resp (1); revise reply motion and brief (1.5); communicate with opposing counsel re motion (.25); file motion (.25)	1.00
5/24/19	Review client docs for rog responses (.75); finalize reply (.75); file same (.25)	0.75
5/28/19	review client documents and revise rog responses/objections	4.00
5/29/19	Review HTA sur-reply case law/proposed motions and communicate with opposing counsel re same (.5); revise rogs (2.5); client phone call re rogs (.25)	2.75
5/31/19	client mtg (1.75); revise rogs (.25); review sur-reply (.25)	2.00
6/3/19	Revise rog objections (.25); email commcns with opposing counsel re site visit and R.26(a) disclosure	0.25
6/4/19	client email commcns re rog responses	0.25

DATE	DESCRIPTION	HOURS
7/10/19	Continue assembling supp doc prod (1.5); finalize and serve R.34 A&O (.25); finalize and circulate R.45 A&M subpoena (.25); serve A&M subpoena (.25); begin drafting R.36 A&O (.5)	0.50
7/11/19	client phone call (.25); draft R.36 resp & obj (1); draft R.33 resp. & obj (.75); research R.26 consulting expert disclosure and waiver issues (1)	2.00
7/24/19	doc review for rog responses (1.25); revise rog responses (.25); draft R.34 ESI search terms (1)	1.50
7/25/19	finalize ESI search terms and send to HTA counsel (.75); review docs for R.33 responses (1.25); finalize draft R.33 and R.36 responses (.75)	2.00
7/29/19	client mtg (.75); witness mtg (.5)	0.75
7/30/19	finalize R.37 conf email (.5); finalize R.33 and R.36 responses (.5); review docs for dep prep (1.75)	0.50
TOTAL		36.00

EXHIBIT B

DATE	DESCRIPTION	HOURS
7/18/19	client conversation (.25) ; email with HTA counsel re dep scheduling/discovery dispute (.25); review dispute ltr (.25)	0.25
9/10/19	Conant deposition (5); Conant dep final prep (2); review Craw docs for dep prep (1)	1.00
9/11/19	client dep prep (2.75) ; continue review of 3d ESI prod (.75)	2.75
9/17/19	client mtg -- dep prep (2) ; Lang dep prep and doc review (1.5)	2.00
9/18/19	Craw deposition prep (1), deposition (8); and post-dep debrief with client (.5) ; revise Lang dep outline (1)	9.50
10/2/19	client email re dep tr (.25) ; discovery phone call with HTA counsel (.75); Howieson dep prep (3.5)	0.25
10/25/19	finish legal research re contract issues (.25); review Craw dep tr (3.25)	3.25
<hr/> TOTAL		19.00

EXHIBIT C

DATE	DESCRIPTION	HOURS
8/5/19	witness phone calls (.5); prepare dep witness fees (.25); finish reviewing docs for dep prep (.5); begin outlining Santa Fe dep (3.5)	3.50
8/6/19	review/outline response to HTA written discovery responses (.75); draft R.37.1 email (1.25); review HTA mgmt manual (1.5); finalize first draft of Santa Fe dep outline (1.75) ; HTA discovery call and notes (1)	3.25
8/30/19	Cordeiro dep outline update (.25); Lang dep outline update (.5); Santa Fe dep outline update (.25) ; file scheduling motion (.25); review and serve 2d supp doc prod (1.5); review new HTA docs (1)	0.25
10/7/19	client phone call (.25); emails to HTA counsel re Santa Fe dep and conf designations (.25) ; legal research re discoverability of medical records (.5)	0.50
10/8/19	Santa Fe dep prep (4.75) ; 3d ESI doc prod review (1.75)	4.75
10/10/19	continue preparing for Santa Fe dep (2.75) ; continue reviewing 3d ESI prod (1.75)	2.75
10/11/19	prep for and take Santa Fe dep	7.00
TOTAL		22.00

EXHIBIT D

DATE	DESCRIPTION	HOURS
1/25/19	Client phone call (.25); email cmmcns to opposing counsel re Oakhill conditions (.25)	0.50
1/28/19	Client and opposing counsel email cmmcns	0.25
2/5/19	Client phone call and email to opposing counsel re site visit	0.25
2/6/19	Client phone call and emails with opposing counsel re site visit	0.25
2/7/19	Client phone call re 2/15 meeting (.25)	0.25
2/11/19	Review cliient documents in anticipation of site visit (.25)	0.25
2/13/19	client phone call (.25) and review client docs in anticipation of site visit (.25)	0.50
2/14/19	Continue reviewing client docs in advance of site visit	0.50
2/15/19	client meetings (1.5); client site inspection by Allen & Major per Defendants (2.5)	4.00
2/19/19	Client phone call and inspector commcn	0.25
2/24/19	Review client docs (1.25); email to opposing counsel re site visit follow up (.25)	1.50
2/27/19	Site visit follow up with opposing counsel (.25)	0.25
2/27/19	Hearing prep (1); review law re consulting experts and draft consulting agmt (1)	1.00
2/28/19	Craw hearing (2 hrs); pre-hearing prep (1); email to inspector (.25)	0.25
3/11/19	Email commcns with client and expert	0.25
3/12/19	client emails with client and opposing counsel re A&M site inspection (.25); review A&M inspection report (.75)	1.00
3/13/19	Commcns with client and opposing counsel re skirt board repair	0.25
3/14/19	Email commcns with client and opposing counsel re skirt board	0.25
3/22/19	Client phone call re Mon site visit	0.25
3/25/19	Client meeting and site inspection (1); witness interviews (.75)	1.00
3/29/19	Home site inspection follow up call with opposing counsel	0.50
4/2/19	Client phone call and opposing counsel phone call re client's home site	0.50

DATE	DESCRIPTION	HOURS
4/3/19	Review Site 100 [consulting expert] inspection report (.25); commcns with client and opposing counsel re debris left on site by Soares (.25)	0.50
4/5/19	Email to client re [consulting expert] insp (.25); AGO mtg (.5)	0.25
6/3/19	Revise rog objections (.25); email commcns with opposing counsel re site visit and R.26(a) disclosure	0.25
6/13/19	draft rogs (.25); review field rep no. 2 (.25)	0.25
6/17/19	research R.34 re property inspections (1); email HTA counsel re same (.25)	1.25
7/3/19	Research R.34 issues related to property insp	0.50
7/9/19	Continue reviewing R.34 inspection caselaw (1); draft R.34 resp & obj (.5); draft A&M subpoena and review docs concerning same (1)	1.50
7/10/19	Continue assembling supp doc prod (1.5); finalize and serve R.34 A&O (.25) ; finalize and circulate R.45 A&M subpoena (.25); serve A&M subpoena (.25); begin drafting R.36 A&O (.5)	0.25
7/11/19	client phone call (.25); draft R.36 resp & obj (1); draft R.33 resp. & obj (.75); research R.26 consulting expert disclosure and waiver issues (1)	1.00
7/19/19	telephone call with HTA counsel re PI dep scheduling and R.34 inspection dispute	0.25
9/20/19	Lang dep prep (4); email to opposing counsel re R.34 inspections (.25) ; prep B.O. re witness phone calls (.25); continue reviewing 3d ESI prod (.75)	0.25
10/16/19	Begin review of newly produced documents and expert reports (2); Cordeiro prep: review of Cordeiro and Hartnett reports (.75) ; Cordeiro dep prep: amend outline and review proposed exhibits (2.5)	0.75
10/28/19	email commcn with possible damages expert (.25); review Hartnet report (1); review Tompos (NTA) report (.75) ; review client lease and related docs (1)	1.75

DATE	DESCRIPTION	HOURS
10/29/19	review Conlin report (.5); client mtg (1.25); commcn with damages expert re documents (.25); R.54 cost research (.25); circulate errata sheet to HTA counsel (.25); review Koontz report (.5); review Kaniecki report (.25)	2.75
10/30/19	client email re expert reports (.25); review CBRE report (.25); doc review re experts (1)	1.50
12/4/19	research R.26(a) and R.45(d) issues related to experts (2); review expert documents (1)	3.00
12/9/19	review filed Webster Collins report (Blake App Ct litig)	0.50
2/24/20	discovery email to opposing counsel re claw-back and follow up destruction (.25); beging motion hrg prep (.25)	0.25
4/14/20	review client photos and circulate same to opposing counsel	0.50
4/15/20	client phone call	0.25
4/24/20	client phone call	0.25
TOTAL		31.75

EXHIBIT E

DATE	DESCRIPTION	HOURS
6/8/20	client phone call (.25); telephone and email commcns with HTA counsel re potential settlement (.5)	0.75
6/19/20	prep for and attend settlement phone call	1.00
6/25/20	settlement call with defense counsel	0.50
6/26/20	settlement phone call with HTA counsel (.5); review settlement proposal and outline response (.75); review proposed R.16 motion (.25); draft proposed sj extension motion (.25); client phone call (.5)	1.75
6/29/20	email commcns re joint motion (.25); file same (.25); begin drafting settlement counter offer (1)	1.00
6/30/20	finalize and circulate settlement cmmcn (.5); client phone call re same (.5); draft and circulate email re R. 16 motion (.25)	1.00
7/16/20	expert phone call (.5); emails with opposing counsel re settlement discussions (.25)	0.25
7/20/20	review settlement papers (.25); discuss same with opposing counsel (1)	1.25
7/21/20	review proposed settlement (.75); review docs to supplement settlement eval (1.5);	2.25
7/22/20	continue reviewing documents to analyze settlement proposal	2.00
7/27/20	review settlement docs related to maint protocol and respond to HTA counsel (.25); revise and file joint mot re SJ briefing (.25)	0.25
7/30/20	outline settlement counter (.25); draft email to HTA counsel re same (1); client phone call (.25)	1.50
8/3/20	prepare for settlement phone call (.25); settlement phone call (.5)	0.75
8/21/20	phone call with damages expert (1); review new settlement proposal (.5)	1.50
8/23/20	client phone call (.25); revise joint sj briefing mot (.25)	0.25
8/25/20	settlement phone call with HTA counsel	0.25
8/27/20	client phone call (.25); review latest settlement offer and outline counter (.75)	1.00
8/28/20	conversation with opposing counsel re settlement (.25); draft and circulate settlement counter offer (.75)	1.00

DATE	DESCRIPTION	HOURS
9/9/20	client phone call	0.25
9/10/20	prepare for mediation	0.50
9/11/20	mediation prep (2); mediation (4)	6.00
9/20/20	client phone call (.25); draft settlement counter (.5); draft joint scheduling motion (.25)	0.75
9/23/20	finish revising 56.1 stmt (1.75); HTA counsel phone call (.25); electronic settlement correspondence (.25)	0.50
9/30/20	review draft expert damages report (1.5); settlement phone call with HTA counsel (1.25)	1.25
10/1/20	settlement email to HTA counsel (.25); review M'boro fed cmplt (.75)	0.25
10/2/20	review settlement doc/engineer plan	0.25
10/6/20	settlement emails and phone call with HTA counsel	0.25
10/7/20	mediator phone call (.25); draft stay mot (.75); review engineering drawing for settlement (.25); client phone call (.25)	1.50
10/8/20	revise and circulate stay motion (.5); email to client (.25); settlement phone calls with HTA counsel (.25); draft and file sched motion (.25);	1.00
10/13/20	emails with HTA counsel re settlement (.25); witness phone call (.25); document review/class-member research for settlement (.5)	0.75
10/14/20	settlement phone call with HTA counsel	0.75
10/16/20	revise and file joint stay mot	0.25
10/15/20	revise and circulate settlement notice/stay mot	0.25
10/19/20	begin drafting class cert motion and mol for settlement	1.50
10/20/20	finish first draft of settlment class cert papers	2.75
10/21/20	research settlement cert issues (.5); research settlement approval issues (.5)	1.00
10/22/20	review R.23 settlement caselaw	0.75
10/23/20	continue reviewing class settlement case law	1.00
10/25/20	review class settlement authorities	0.75
10/31/20	review choice of law authority re fee award in class action settlements	0.50
11/3/20	revise and contnue drafting class cert/settlement motion and MOL	4.50
11/4/20	review and organize time records for settlement motion	3.75

DATE	DESCRIPTION	HOURS
11/5/20	continue organizing time records (2.5); continue drafting settlement MOL (2); research R.23 juris re approval of settlement with fee award (.75)	5.25
11/6/20	draft Horowitz decl for settlement (1); draft Lutes decl (.5)	1.50
11/12/20	review settlement commcn from HTA re Oakhill site drainage projects	0.25
11/17/20	review proposed settlement agmt	3.25
11/18/20	begin revising settlement agmt	1.50
11/19/20	continue reviewing and revising settlement agmt (3.75); circulate same with comments to HTA counsel (.25)	4.00
11/24/20	client phone call	0.25
12/3/20	Keycite and review select settlement motion cases	0.50
12/10/20	commcns with opposing counsel and prospective settlement admins re quotes	0.50
12/11/20	revise settlement approval motion papers (1.75); phone call/email with opposing counsel re status of settlement agmt (.25)	2.00
12/14/20	revise preliminary approval motion and MOL	2.00
12/15/20	review/revise joint motion	0.25
12/16/20	review HTA revisions to settlement agmt and outline same	2.25
12/17/20	continue review of agmt and draft/circulate commcns to HTA counsel re problems with settlement agmt	2.75
12/18/20	review caselaw re mediation privilege and enforcement of settlement agmts	2.00
12/21/20	review caselaw re enforcement of mediated settlement agmt and corresponding evid issues	3.00
12/23/20	review settlement enforcement caselaw	0.25
12/24/20	review settlement enforcement caselaw	1.00
12/28/20	review authorities re settlement enforcement; mediation privileges and admissibility of offers of compromise	1.50
12/29/20	client phone call	0.25
12/30/20	review caselaw re settlement enforcement	0.50
1/6/21	settlement agmt negotiation phone call	2.00

DATE	DESCRIPTION	HOURS
1/11/21	revise settlement agmt	2.75
1/12/21	revise and circulate settlement agmt to HTA counsel	2.50
1/14/21	finish review/revise settlement notice (1.25); review exemplar notice provided by HTA (.25); review/revise claim form and allocation plan (.5); review/revise pub notice (.25)	2.25
1/19/21	continue revising settlement motion, MOL and Horowitz decl.	1.75
1/20/21	review time records (.5); review and revise Horowitz decl. in support of settlement motion (.5)	1.00
1/27/21	emails with HTA counsel re settlement docs	0.25
1/28/21	review, revise, circulate joint rep/mot re SJ and settlement (.25); file same (.25)	0.50
1/29/21	phone calls with HTA counsel re settlement	0.50
2/4/21	review latest draft of settlement agmt	3.25
2/5/21	final review of settlement (.25); client phonecall re settlement (.25); emails to HTA counsel re settlement (.25)	0.75
2/8/21	review/revise plan of allocation and prelim app order	1.25
2/10/21	continue revising and circulate to HTA counsel plan of allocation and prelim approval order	0.75
2/12/21	commcns with HTA counsel re claim forms and settlement dist issues	0.25
2/22/21	review HTA edits to Plan of Allocation, Notice and Claim Form	1.50
2/23/21	commcns to HTA counsel re further revision to notice and further discussions re notice, allocation plan and claim form	0.25
2/25/21	review and revise proposed status report (.25); communicate with def counsel re same and file (.25)	0.50
3/2/21	review/revise latest versions of notice, prelim approval order; plan of allocation, claim form and final order/judgment (3); review injunctive relief stormwater ops document (.5); draft email to HTA counsel re same (.75)	4.25
3/3/21	settlement term negotiation call with HTA counsel	0.75

DATE	DESCRIPTION	HOURS
3/9/21	client phone call and emails (.25); email to HTA counsel re septic issue and settlement (.25)	0.50
3/11/21	review settlement agmt vis-a-vis septic issue	0.50
3/18/21	review latest round of settlement exhibits and email HTA counsel re same	2.00
3/19/21	commcns with potential settlement admins (.5); commcn with client re settlement docs (.25)	0.75
3/20/21	review settlement publication notice materials	0.25
3/22/21	begin review of final settlement package	2.75
3/23/21	finish reviewing settlement package docs (1); client mtg (.5); compile executed signature docs and circulate to HTA counsel (.25); revise prelim approval motion papers (1.75)	3.50
3/24/21	final review of preliminary approval papers	0.75
3/31/21	review and revise propose joint status report	0.25
4/6/21	emails commcns with HTA counsel re settlement agmt	0.25
4/7/21	begin revisions PAO motion exhibits, for review by HTA counsel	0.25
4/8/21	review, revise and circulate prelim approval mot exhibits	1.25
4/12/21	phone call with defense counsel re PAO motion papers	0.25
4/14/21	commcns with proposed settlement admin and HTA counsel re admin decl (.25); review proposed revisions to PAO motion papers (1.75); revise Horowitz decl (.25)	2.25
4/15/21	review and revise PAO moving papers and declarations (2); email HTA counsel re same (.25)	2.25
4/17/21	further review PAO exhibits	0.75
4/18/21	further review PAO exhibits	0.50
4/19/21	further review PAO exhibits	0.75
4/29/21	review and propose revisions for PAO papers	2.00
5/4/21	emails with HTA counsel and settlement admin re settlement (.25); review PAO MOL and Thaggard decl. (1.5); email HTA counsel re same (.25); revise Horowitz decl. (.25)	2.25

DATE	DESCRIPTION	HOURS
5/5/21	settlement admin phone call with HTA counsel and admin and follow-up tasks (1); review PAO papers (.75); revise and circulate Horowitz decl. (.25)	2.00
5/6/21	begin review of filed PAO papers (.25); finalize Lutes decl. filing (.25)	0.50
5/9/21	continue review of pao orders/deadlines (.5); email hta counsel and class admin re same (.25)	0.75
5/10/21	review drafts of settlement notice docs (1); emails with HTA counsel and settlement admin re same (.5)	1.50
5/11/21	client phone call	0.25
5/13/21	review docs/email commcns with opposing counsel and settlement admin re class notice	0.75
5/14/21	review publication notices (.25); email and phone commcns with HTA counsel and settlement admin re same (.25)	0.50
5/19/21	client phone call	0.25
5/20/21	class member phone call	0.25
5/26/21	settlement admin and opposing counsel emails	0.25
6/1/21	review settlement admin/HTA counsel emails re notice plan	0.25
6/8/21	review, revise Stip re dismissal of certain claims (.25); commcns with HTA counsel and file same (.25)	0.50
6/17/21	reweiev memo re 1st cir dist ct incentive awards	0.25
6/28/21	client phone call (.25); coordinate settlement outreach with other NJC volunteers/staff (.25)	0.50
6/29/21	call with HTA counsel re settlement next steps	0.25
7/7/21	meeting with interns to plan Oakhill door-knocking outreach	0.50
7/8/21	fairness hrg planning call with HTA counsel	0.25
7/15/21	outreach debrief with interns	0.25
7/16/21	class member commcn	0.50
7/19/21	commcns with class member and HTA counsel re 46 Catherine Dr. site	0.50
7/20/21	class member commcns (.25); discussion of settlement with Atty Tekippe (.25)	0.50
7/21/21	class member commcns (.5); phone call with HTA counsel re potential objector (.25)	0.75

DATE	DESCRIPTION	HOURS
7/22/21	class member commcns (.25); draft fee mot. and MOL (2); begin organizing time records for decl. (1)	3.25
7/26/21	objector phone call (.25); continue compilation of time records (.25); revise fee motion and MOL (1)	1.50
7/27/21	review incentive award case law (.5); revise fee motion brief (.25); compile Horowitz decl. exhibits (.5); commcns with class members (.5)	1.75
7/29/21	revise fee motion, MOL and decl.	2.25
7/30/21	phone calls with HTA counsel re Lane objection (.5); final revisions to fee motion papers and circulate the same to HTA counsel (.5)	1.00
8/3/21	class member commcn	0.25
8/12/21	email commcns with HTA counsel re final approval papers (.25); phone call with objector counsel (.25)	0.50
8/13/21	review final approval docs circulated by HTA counsel (.25); phone call with HTA counsel re same and related matters (.25); revise fee motion docs (.25)	0.75
TOTAL		158.25

EXHIBIT F



**Duffy & McKenna
Court Reporters, LLC**

P.O. Box 1658
Dover, NH 03821

Invoice

Date	Invoice #
11/4/2019	LG 5439
Due Date	12/4/2019
Court Reporter	LG

FED TAX ID# 20-0450300

Bill To:

Northeast Justice Center
Ethan R. Horowitz, Esq.
50 Island Street, Ste. 203B
Lawrence, MA 01840-1869

Matter/Deposition	Josephine Santa Fe
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Item	Description	Qty/Pgs.	Amount
Original-MA Exhibits - scanned Postage/Shipping	Case: Craw, et al v. Hometown America Location: Lawrence, MA Date: 10/11/2019		
	PDF	222	799.20
	PDF (Scanned & Linked)	263	65.75
	Priority Mail. Return original exhibits	1	10.00

<i>Thank You For Your Business!</i>	Total	\$874.95
	Payments/Credits	\$0.00
	Balance Due	\$874.95

Make Checks Payable To:
Duffy & McKenna Court Reporters
For Amex/Visa/Mastercard Payment, please call our office.

Net 30 Late Fees: 1.5% per month

Phone #	Fax #	E-mail	Web Site
603-743-4949	603-743-4952	camille@stenosearch.com	www.dmreporting.com

NORTHEAST JUSTICE CENTER, LLC
OPERATING ACCOUNT

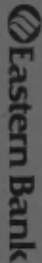
08/05/19 Check #: 15244 15244

Vendor ID: SANTAFEJOS Vendor Name: Josephine Santa Fe

Invoice No.	Date	Invoice Amount	Amount Paid	Discounts Taken	Credits Taken	Net Amount
WITNESS FEE& MILEAGE	08/05/19	125.38	125.38	0.00	0.00	125.38
						Net Check Amt 125.38

15244

NORTHEAST JUSTICE CENTER, LLC
50 ISLAND STREET, STE. 203B
LAWRENCE, MA 01940



800 N. MA 02115
easternbank.com
1-800-EASTERN



15244

***** One Hundred Twenty Five & 38/100 Dollars

DATE	AMOUNT
08/05/19	*****125.38

Josephine Santa Fe

PAY TO THE ORDER OF



AUTHORIZED SIGNATURE

Security features. Details on back.



EXHIBIT G
SHEA COURT REPORTING SERVICES

15 Court Square, Suite 920, Boston, MA 02108-2524
 (617) 227-3097 Fax (617) 227-3898 Cell Phone (617) 921-6986
 FID No. 04-3050859

SEND TO:

ETHAN HOROWITZ, ESQUIRE
 NORTHEAST JUSTICE CENTER
 UNION CROSSING
 50 ISLAND ST.; STE 203B
 LAWRENCE MA 01840

INVOICE	DATE
36781	09/30/19

DATE PAID	
CHECK NO.	

FOR BARBARA CRAW, ET AL.

Subject:

BARBARA CRAW, ET AL. VS. HOMETOWN AMERICA, LLC,
 ET AL.

Original Billing Date:

09/30/19
 CM /

09/18/19 - DEPOSITION OF BARBARA L. CRAW
 EXHIBITS SCANNED AND RETURNED TO ATTY. GOODHEART

COPY - 313 pp. @ \$3.15
 COPY OF EXHIBITS

\$985.95
 40.00

TOTAL: \$1025.95

- * TO BE SIGNED. PLEASE MAKE ARRANGEMENTS.
- * MINUSCRIPT BUNDLE EMAILED TO YOU 10/1/2019.
- * PLEASE PRINT PAGE 312 FOR SIGNATURE. SCANNED EXHIBITS ATTACHED TO MINUSCRIPT BUNDLE.

THANK YOU!

30 day overdue accounts will be charged interest of 1½% per month.