

Exhibit A

EXHIBIT A

SHAPIRO HABER & URMY LODESTAR BY YEAR

Year	Hours	Lodestar Current Rates	Key Litigation Events
1998 <i>Aspinall</i>	69.40	\$44,640.00	<ul style="list-style-type: none"> • <u>Investigation and Filing Complaint</u>
1999 <i>Aspinall</i>	150.30	\$88,657.50	<ul style="list-style-type: none"> • <u>Removal</u> <ul style="list-style-type: none"> ○ Briefing on Motion to Remand ○ Decision Remanding to State Court • <u>First Amended Complaint</u>
2000 <i>Aspinall</i>	221.20	\$147,535.00	<ul style="list-style-type: none"> • <u>Class Certification Discovery</u> <ul style="list-style-type: none"> ○ Initial Document Requests, Interrogatories and Responses ○ Deposition of Lori Aspinall ○ Deposition of Thomas Geanacopoulos
2001 <i>Aspinall</i>	1,273.80	\$873,395.50	<ul style="list-style-type: none"> • <u>Second Amended Complaint</u> • <u>Class Certification</u> <ul style="list-style-type: none"> ○ Plaintiffs' Memorandum in Support of Motion for Class Certification ○ Study Defendants' Opposition to Plaintiffs Motion for Class Certification ○ Plaintiffs' Reply Memorandum in Support of Motion for Class Certification ○ Hearing on Motion for Class Certification ○ Decision Granting Class Certification • <u>Motion for Judgment on the Pleadings</u> <ul style="list-style-type: none"> ○ Study Defendants' Motion for Judgment on the Pleadings Based on Res Judicata ○ Plaintiffs' Opposition to Defendants' Motion for Judgment on the Pleadings Based On Res Judicata ○ Study Defendants' Reply in Support of Motion for Judgment on the Pleading Based on Res Judicata ○ Plaintiffs' Surreply in Opposition to Defendants' Motion for Judgment on the Pleadings Based on

			<p>Res Judicata</p> <ul style="list-style-type: none"> ○ Hearing on Motion for Judgment on the Pleadings ○ Study Decision Denying Motion for Judgment on the Pleadings ○ Plaintiffs' Motion for Attorneys' Fees Under G.L. c. 231, §6F ○ Study Defendants' Opposition to Motion for Attorneys' Fees Under G.L. c. 231, §6F ○ Plaintiffs' Reply in Support of Motion for Attorneys' Fees Under G.L. c. 231, §6F ● <u>Reconsideration of Class Certification</u> <ul style="list-style-type: none"> ○ Study Defendants' Motion for Reconsideration of Class Certification Decision ○ Plaintiffs' Opposition to Defendants' Motion for Reconsideration of Class Certification Decision ○ Decision Denying Motion for Reconsideration ● <u>Request to Report</u> <ul style="list-style-type: none"> ○ Study Defendants' Request to Report Class Certification Decision to Massachusetts Appeals Court
2002 <i>Aspinall</i>	409.30	\$299,635.00	<ul style="list-style-type: none"> ● <u>Request to Report Class Certification Decision to Appeals Court</u> <ul style="list-style-type: none"> ○ Plaintiffs' Opposition to Defendants Request to Report Class Certification Decision to Massachusetts Appeals Court ○ Decision Declining to Report Class Certification Decision to Massachusetts Appeals Court ● <u>Petition for Interlocutory Review</u> <ul style="list-style-type: none"> ○ Study Defendants' Petition for Interlocutory Review Pursuant to G.L. c. 231, §118 ○ Plaintiffs' Opposition to Defendants' Petition for Interlocutory Review Pursuant to G.L. c. 231, §118 ○ Plaintiffs' Memorandum Regarding Timeliness of Interlocutory Petition ● <u>Third Amended Complaint</u> <ul style="list-style-type: none"> ○ Motion for Leave to File Third Amended

			<p>Complaint</p> <ul style="list-style-type: none"> ○ Third Amended Complaint ● <u>Discovery</u> <ul style="list-style-type: none"> ○ Document requests
2003 <i>Aspinall</i>	849.90	\$584,232	<ul style="list-style-type: none"> ● <u>Third Amended Complaint</u> <ul style="list-style-type: none"> ○ Study Defendants' Opposition to Motion for Leave to File Third Amended Complaint ○ Plaintiffs' Reply Memorandum in Support of Motion for Leave to File Third Amended Complaint ● <u>Discovery</u> <ul style="list-style-type: none"> ○ Document requests and Interrogatories ● <u>Class Notice</u> <ul style="list-style-type: none"> ○ Plaintiffs' Motion Regarding Notice to Class and Proposed Protocol ○ Study Defendants' Opposition to Plaintiffs' Motion Regarding Notice to Class and Proposed Alternative Protocol ● <u>Petition for Interlocutory Review</u> <ul style="list-style-type: none"> ○ Plaintiffs' Memorandum to Appeals Court Single Justice Regarding Standards for Interlocutory Review ○ Decision of Single Justice Decertifying the Class ● <u>Motion for Reconsideration or Request for Report</u> <ul style="list-style-type: none"> ○ Plaintiffs' Motion for Reconsideration of Interlocutory Order of Single Justice, or in the alternative, to Report to Massachusetts Appeals Court ○ Study Defendants' Opposition to Motion for Reconsideration of Interlocutory Order of Single Justice, or in the alternative, to Report to Massachusetts Appeals Court ○ Plaintiff's Reply Memorandum in Support of Motion for Reconsideration of Interlocutory Order of Single Justice, or in the alternative, to Report to Massachusetts Appeals Court

			<ul style="list-style-type: none"> ○ Decision Granting Plaintiffs' Motion To Report to Massachusetts Appeals Court ● <u>Appeal of Interlocutory Order Decertifying the Class</u> <ul style="list-style-type: none"> ○ Assembly of Record of Appeal ○ Plaintiff's Application for Direct Appellate Review to the Supreme Judicial Court ○ Brief of Plaintiffs/Appellants to SJC Regarding Class Certification
2004 <i>Aspinall</i>	431.30	\$316,478.50	<ul style="list-style-type: none"> ● <u>Appeal of Interlocutory Order Decertifying the Class</u> <ul style="list-style-type: none"> ○ Study Brief of Defendants/Appellees and Amici to SJC Regarding Class Certification ○ Reply Brief of Plaintiff to SJC Regarding Class Certification ○ Plaintiff's Response to Defendants' Motion to Strike Portions of Reply Brief ○ Oral Argument Regarding Class Certification ○ Submissions and Responses to Supplemental Authority Regarding Class Certification ○ Decision of Supreme Judicial Court Reinstating Class Certification Decision ● <u>Class Notice</u> <ul style="list-style-type: none"> ○ Document Request Re: Adult Smoker Database ○ Deposition of Defendants' Expert (Lanchaster) Re: Notice Issues
2005 <i>Aspinall</i>	1,214.00	\$762,298.50	<ul style="list-style-type: none"> ● <u>Class Notice</u> <ul style="list-style-type: none"> ○ Deposition of Margolis Re: Notices Issues and Adult Smoker Database ○ Supplemental Briefing Re: Notice of Class Certification (including retention of expert of notice issues) ● <u>Motion for Summary Judgment Based on Preemption</u> <ul style="list-style-type: none"> ○ Study Defendants' Motion for Summary Judgment Based on Preemption ○ Deposition of Defendant's Expert (Peterman) Regarding Preemption Issues

			<ul style="list-style-type: none"> ○ Plaintiffs’ Opposition to Defendants’ Motion for Summary Judgment Based on Preemption Plaintiffs’ ○ Cross Motion for Summary Judgment to Dismiss Preemption Defenses ○ Plaintiffs’ Reply Memorandum in Support of Motion for Summary Judgment to Dismiss Preemption Defenses ● <u>Absent Class Member Depositions</u> <ul style="list-style-type: none"> ○ Study Defendants’ Motion to Take 624 Absent Class Member Depositions ○ Plaintiffs’ Opposition to Defendant’s Motion to Take Absent Class Member Depositions ○ Study Defendants’ Reply In Support of Motion to Take Absent Class Member Depositions ○ Plaintiffs’ Surreply in Opposition to Defendants’ Motion to Take Absent Class member Depositions
2006 <i>Aspinall</i>	588.90	\$391,538.50	<ul style="list-style-type: none"> ● <u>Motion for Summary Judgment Based on Preemption</u> <ul style="list-style-type: none"> ○ Supplemental Briefing and Submissions Regarding Preemption Issues ○ Decision Denying Motion for Summary Judgment Based on Preemption ● <u>Motion for Reconsideration of Preemption Decision or in the Alternative Request to Report Preemption Decision to Appeals Court</u> <ul style="list-style-type: none"> ○ Study Defendants’ Motion for Reconsideration, or in the alternative, to Report Decision Denying Defendants’ Motion for Summary Judgment Regarding Preemption ○ Plaintiffs’ Opposition to Defendants Motion for Reconsideration Regarding Preemption ○ Report to Massachusetts Appeals Court Regarding Preemption ● <u>Class Definition</u> <ul style="list-style-type: none"> ○ Plaintiffs’ Motion for Reconsideration of Orders Regarding Scope of Class Definition

			<ul style="list-style-type: none"> ○ Study Defendants' Opposition to Plaintiffs' Motion for Reconsideration of Order Regarding Scope of Class Definition ○ Plaintiffs' Reply Memorandum in Support of Motion for Reconsideration Regarding Scope of Class Definition ○ Decision Denying Motion to Reconsider Class Definition
2006 <i>Good v. Altria</i>	105.20	\$79,236.00	<ul style="list-style-type: none"> ● <u>Maine District Court Decision</u> <ul style="list-style-type: none"> ○ Study Maine District Court Decision Dismissing Case Based On Preemption ○ Discussions with Maine Counsel Re Preemption Briefing and Development of Litigation Strategy ○ Review Pleadings From Maine Case ● <u>Appeal to First Circuit</u> <ul style="list-style-type: none"> ○ Assist and Confer with Maine Counsel Regarding Brief of Stephanie Good to First Circuit ○ File Notice of Appearance ○ Study Brief of Altria to First Circuit ○ Prepare and file Reply Brief of Stephanie Good to First Circuit ● Preparation for Oral Argument
2007 <i>Aspinall</i>	436.30	\$302,585.50	<ul style="list-style-type: none"> ● <u>Appeal to Denial of Summary Judgment Based on Preemption</u> <ul style="list-style-type: none"> ○ Assembly of Record for Massachusetts Appeals Court Regarding Preemption ○ Plaintiffs Motion for Direct Appellate Review Regarding Preemption ○ Study Brief of Defendants and Amici to SJC Regarding Preemption ○ Brief of Plaintiffs to SJC Regarding Preemption ○ Study Reply Brief to SJC of Defendants Regarding Preemption ○ Surreply Brief of Plaintiffs to SJC Regarding Preemption

<p>2007 <i>Good v. Altria</i></p>	<p>324.00</p>	<p>\$233,736.00</p>	<ul style="list-style-type: none"> • <u>Appeal to First Circuit</u> <ul style="list-style-type: none"> ○ Preparation for Oral Argument ○ Oral Argument Before First Circuit ○ Respond to Supplemental Submissions to First Circuit By Altria ○ Supplemental Submission to First Circuit Regarding Watson Case ○ Study First Circuit Decision Reversing District Court • <u>Certiorari Petition to Supreme Court</u> <ul style="list-style-type: none"> ○ Study PM and Altria Certiorari Petition and Amici Briefs In Support of Certiorari Petition ○ Draft and file Brief of Stephanie Good in Opposition to Certiorari Petition
<p>2008 <i>Aspinall</i></p>	<p>93.30</p>	<p>\$68,575.00</p>	<ul style="list-style-type: none"> • <u>Appeal to Denial of Summary Judgment Based on Preemption</u> <ul style="list-style-type: none"> ○ Oral Argument Before SJC Regarding Preemption ○ Briefing on Stay Pending Good v. Altria ○ Study Good v. Altria Decision ○ Notice of Supplemental Authority Regarding Good v Altria decision
<p>2008 <i>Good v. Altria</i></p>	<p>428.20</p>	<p>\$313,948.00</p>	<ul style="list-style-type: none"> • <u>Certiorari Petition to Supreme Court</u> <ul style="list-style-type: none"> ○ Study Reply Brief in Support of Certiorari Petition • <u>Appeal to Supreme Court</u> <ul style="list-style-type: none"> ○ Develop Strategy Regarding Appeal to Supreme Court ○ Meetings with attorneys in other light cigarette litigation regarding Supreme Court strategy, solicitation of amici briefs, retention of Supreme Court litigator ○ Interview and Retain David Frederick ○ Study Briefs of Altria, and various amici ○ Legal Research Regarding Preemption Issues ○ Work with David Frederick on drafting Brief of

			<p>Stephanie Good</p> <ul style="list-style-type: none"> ○ Review Amici Briefs in Support of Stephanie Good ○ Study Reply Brief of Altria ○ Participation in Moot Courts and Assist in Preparation for Supreme Court Oral Argument ○ Hearing Before Supreme Court ○ Study Supreme Court Decision
2009 <i>Aspinall</i>	649.50	\$443,555.00	<ul style="list-style-type: none"> ● <u>Appeal to Denial of Summary Judgment Based on Preemption</u> <ul style="list-style-type: none"> ○ Supplemental Briefing Regarding Impact of <i>Good v Altria</i> on SJC Appeal ○ Decision of SJC Affirming Denying of Summary Judgment ● <u>Class Notice</u> <ul style="list-style-type: none"> ○ Supplemental Briefing on Form and Method of Providing Notice to Class Regarding ○ Publication and Dissemination of Notice ○ Responding to Class Member Inquiries ● <u>Motion for Summary Judgment Based On Collateral Estoppel</u> <ul style="list-style-type: none"> ○ Study 1,000 page DOJ Decision (Trial and D.C. Circuit) ○ Review Record of DOJ case (including trial testimony, exhibits, depositions) ○ Work on Plaintiffs' Motion for Partial Summary Judgment Regarding Collateral Estoppel ● <u>Experts</u> <ul style="list-style-type: none"> ○ Work with experts on issues of damages, profits, class size, sales data
2010 <i>Aspinall</i>	734.00	\$461,748.00	<ul style="list-style-type: none"> ● <u>Motion for Summary Judgment Based On Collateral Estoppel</u> <ul style="list-style-type: none"> ○ Work on Plaintiffs' Motion for Partial Summary Judgment Regarding Collateral Estoppel ○ Study Defendants Opposition to Plaintiffs' Motion for Partial Summary Judgment Regarding Collateral Estoppel, Including Record of dozens of trial verdicts cited and expert

			<ul style="list-style-type: none"> affidavits ○ Plaintiffs' Reply Memorandum in Support of Partial Summary Judgment on Collateral Estoppel ● <u>Discovery</u> <ul style="list-style-type: none"> ○ Work on discovery requests regarding damages and profits ○ Responses to Defendants' Document Requests and Interrogatories ● <u>Experts</u> <ul style="list-style-type: none"> ○ Work with experts on issues of damages, profits, class size, sales data
2011 <i>Aspinall</i>	139.70	\$99,065.50	<ul style="list-style-type: none"> ● <u>Motion for Summary Judgment Based On Collateral Estoppel</u> <ul style="list-style-type: none"> ○ Hearing on Plaintiffs' Motion for Partial Summary Judgment Regarding Collateral Estoppel ● <u>Discovery</u> <ul style="list-style-type: none"> ○ Research, analysis and discovery regarding damages ● <u>Other Light Cigarette Litigation</u> <ul style="list-style-type: none"> ○ Monitor developments in other lights cigarette litigation
2012 <i>Aspinall</i>	119.20	\$81,729.00	<ul style="list-style-type: none"> ● <u>Motion for Summary Judgment Based On Collateral Estoppel</u> <ul style="list-style-type: none"> ○ Decision on Plaintiffs' Motion for Partial Summary Judgment Regarding Collateral Estoppel ● <u>Discovery</u> <ul style="list-style-type: none"> ○ Research, analysis and discovery regarding damages ● <u>Other Light Cigarette Litigation</u> <ul style="list-style-type: none"> ○ Monitor developments in other lights cigarette litigation

<p>2013 <i>Aspinall</i></p>	<p>187.20</p>	<p>\$147,568.00</p>	<ul style="list-style-type: none"> • <u>Appearance By Hagens Berman</u> • <u>Protocol for Absent Class Depositions</u> <ul style="list-style-type: none"> ○ Briefing on protocol for absent class member depositions ○ Decision on protocol for absent class member depositions • <u>Litigation Over Available Remedies</u> <ul style="list-style-type: none"> ○ Plaintiffs’ Motion Regarding Availability of Remedies ○ Study Defendants Opposition to Plaintiffs’ Motion Regarding Availability of Remedies ○ Plaintiffs’ Reply Regarding Availability of Remedies • <u>Expert Discovery</u> <ul style="list-style-type: none"> ○ Stipulation Regarding Discoverability of Expert Materials
<p>2014 <i>Aspinall</i></p>	<p>2,530.10</p>	<p>\$1,572,178.00</p>	<ul style="list-style-type: none"> • <u>Litigation over Available Remedies</u> <ul style="list-style-type: none"> ○ Decision on Available Remedies ○ Plaintiffs’ Request for Report Decision Regarding Remedies to Massachusetts Appeals Court ○ Plaintiffs’ Petition for Interlocutory Review • <u>Absent Class Depositions</u> <ul style="list-style-type: none"> ○ 25 Absent Class Member Depositions • <u>Withdrawal of Hagens Berman</u> • <u>Discovery</u> <ul style="list-style-type: none"> ○ Document Requests and Interrogatories (Regarding Class Size, Market Share, Profits, Pricing, Sales, Exhibits and Transcripts from other light cigarette cases) ○ Requests for Admission to Authenticate Documents and Identify Philip Morris Employees

			<ul style="list-style-type: none"> • <u>Expert Discovery</u> <ul style="list-style-type: none"> ○ Plaintiffs' Expert Reports ○ Depositions of Plaintiff's Experts • <u>Trial Preparation</u> <ul style="list-style-type: none"> ○ Trial Preparation: Review Documents in Need of Authentication, Requests for Admissions ○ Document Requests and Interrogatories Re: Liability and Damages • <u>Motion to Strike Profits and Expanded Class Period Data</u> <ul style="list-style-type: none"> ○ Defendants Motion to Strike Profits and Expanded Class Period Data from Harris and Dennis Expert Reports ○ Plaintiff's Opposition To Defendants Motion to Strike Profits and Expanded Class Period Data from Harris and Dennis Expert Reports
2015 <i>Aspinall</i>	7,522.50	\$4,231,325.00	<ul style="list-style-type: none"> • <u>Expert Discovery</u> <ul style="list-style-type: none"> ○ Review and Study Defendant's Expert Reports (11 experts) ○ Depositions of Defendants' Experts (10 depositions) ○ Plaintiffs' Rebuttal Expert Reports (2) ○ Depositions of Plaintiffs' Rebuttal Experts (2) • <u>Motion for Summary Judgment Regarding Injury</u> <ul style="list-style-type: none"> ○ Study Defendants Motion for Summary Judgment Regarding Injury ○ Plaintiffs' Opposition to Defendants' Motion for Summary Judgment Regarding Injury ○ Study Defendants Reply In Support of Motion for Summary Judgment Regarding Injury ○ Hearing on Summary Judgment Motion ○ Decision Denying Motion for Summary Judgment Regarding Injury • <u>Lanigan Motions</u> <ul style="list-style-type: none"> ○ Study Defendants' Motion to Exclude Expert Testimony from Dr. Burns and Dr. Shields Regarding Dangerous Testimony

			<ul style="list-style-type: none"> ○ Plaintiffs' Opposition Defendants' Motion to Exclude Expert Testimony from Dr. Burns and Dr. Shields Regarding Dangerous Testimony ○ Study Defendants' Reply in Support of Motion to Exclude More Dangerous Testimony ○ Study Defendants Motion to Exclude Testimony of Harris and Dennis ○ Plaintiffs' Opposition Defendants Motion to Exclude Testimony of Harris and Dennis ○ Study Defendants Reply In Support of Motion to Exclude Testimony of Harris and Dennis ○ Hearing on Lanigan Motions ○ Decisions Denying Lanigan Motions ● <u>Final Pretrial Conference</u> <ul style="list-style-type: none"> ○ Joint Pretrial Memorandum ○ Joint Protocol for the Exchange of Exhibits, Deposition Designations, Motions in Limine ○ Final Pretrial Conference ● <u>Motions in Limine</u> <ul style="list-style-type: none"> ○ Plaintiffs' Motions to Admit or Exclude Evidence (Farone, Out-of-State Absent Class Members Depositions, Counter-Designations, Goodman) ○ Plaintiffs' Responses to Defendants' Motions in Limine (Cullman, Knowledge and Intent, Noerr-Pennigton, Buckman) ○ Hearings on Motions in Limine ● <u>Trial Preparation</u> <ul style="list-style-type: none"> ○ Review Exhibits from Price Trial, Craft Trial, Brown Trial, DOJ Trial and Documents from Legacy Tobacco Database and PM Litigation Database ○ Review deposition and trial testimony from Price, Brown, Craft, DOJ Trial, Minnesota Trial ○ Designation of Exhibits ○ Objections to Exhibits ○ Deposition Designations ○ Objections to Deposition Designations
--	--	--	---

			<ul style="list-style-type: none"> ○ Preparation of Trial Demonstratives ○ Preparation of Plaintiffs' Experts for Trial ○ Preparation of Witnesses for Trial ○ Preparation for Cross Examination of Defendants' Experts ● <u>Trial: October 19 – November 23, 2015</u> <ul style="list-style-type: none"> ○ Plaintiffs' Case in Chief: 5 Expert Witnesses; 2 Fact Witnesses; 13 Depositions ○ Defendants' Case in Chief: 3 Expert Witnesses; 17 Absent Class Member Depositions ○ Plaintiffs' Rebuttal Case: 3 Absent Class Member Depositions ● <u>Proposed Findings of Fact and Conclusions of Law</u> <ul style="list-style-type: none"> ○ Plaintiffs' Proposed Findings of Fact and Conclusions of Law ○ Study Defendant's Proposed Findings of Fact and Conclusions of Law ● <u>Motion to Decertify Class</u> <ul style="list-style-type: none"> ○ Study Defendant's Motion to Decertify the Class
2016 (through 7/25/16) <i>Aspinall</i>	943.00	\$587,711.50	<ul style="list-style-type: none"> ● <u>Proposed Findings of Fact and Conclusions of Law</u> <ul style="list-style-type: none"> ○ Response to Defendants Proposed Findings of Fact and Conclusions of Law ● <u>Motion to Decertify Class</u> <ul style="list-style-type: none"> ○ Plaintiffs' Opposition to Defendants' Motion to Decertify the Class ● <u>Findings of Fact and Conclusions of Law After Trial</u> <ul style="list-style-type: none"> ○ Study Court's Findings and Conclusions ○ Research potential appeal issues ● <u>Fee Application (March 21, 2016)</u> <ul style="list-style-type: none"> ○ Research ○ Fee Application ○ Fee Affidavit ○ Affidavit of Professor William Rubinstein

			<ul style="list-style-type: none"> • <u>Settlement</u> <ul style="list-style-type: none"> ○ Settlement negotiations ○ Memorandum of Understanding ○ Settlement Stipulation, Class Notice, Publication Notice, Claim Form, Escrow Agreements • <u>Preliminary Approval</u> <ul style="list-style-type: none"> ○ Preliminary Approval Memorandum • <u>Final Approval</u> <ul style="list-style-type: none"> ○ Final Approval Memorandum ○ Settlement Affidavit • <u>Settlement Administration</u>¹ <ul style="list-style-type: none"> ○ Requests for Proposals from Settlement Administrators ○ Oversight of Notice Program ○ Oversight of Settlement Administration and Claims Processing ○ Oversight of Escrow Funds ○ Respond to Class Member Inquiries
TOTAL	19,420.30	\$12,131,371.00	

¹ Class Counsel expects to expend substantial additional time on settlement administration work which is ongoing.