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ZAKAY LAW GROUP, APLC

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Attorneys for Plaintiff MANUEL VILLA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF FRESNO

MANUEL VILLA, an individual(s), on behalf
of himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

TRILLIUM PUMPS USA, INC., a Delaware
Corporation; and DOES 1-50, Inclusive,

Defendants.

Case No. 22CECG01104

**DECLARATION OF SHANI O. ZAKAY, ESQ.
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT**

Date: October 17, 2023

Time: 3:27 p.m.

Judge: Hon. Jonathan Skiles

Dept.: 403

1 I, SHANI O. ZAKAY, declare as follows:

2 1. I am the managing partner of the law firm of Zakay Law Group, APLC, co-counsel of
3 record for Plaintiff in this matter. As such, I am fully familiar with the facts, pleadings, and history of
4 the matter. The following facts are within my own personal knowledge, and if called as a witness, I
5 could testify competently to the matters stated herein.

6 2. This Declaration is being submitted in support of Plaintiff's motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 3. My firm has worked on this matter over the course of the litigation during the last twenty-
9 one months. My credentials are reflected in the Zakay Law Group, APLC firm resume, a true and
10 correct copy of which is attached hereto as Exhibit A. Some of the major cases my firm has undertaken
11 is also set forth in Exhibit A. I have had class litigation experience, mostly in the area of employment
12 class actions, unfair business practices, and other complex litigation. I have experience in cases
13 involving labor code violations and wage and hour claims. I have litigated similar wage and hour cases
14 against other employers on behalf of employees. I have been approved as experienced class counsel in
15 courts throughout California. It is this level of experience which enabled my firm to undertake the
16 instant matter and to successfully combat the resources of the defendant and its capable and experienced
17 counsel.

18 4. As of September 20, 2023, Zakay Law Group, APLC incurred lodestar totaling \$61,824
19 in this matter. I have reviewed my firm's lodestar in this matter and believe the charges are reasonable
20 and were reasonably necessary to the conduct of the case. From January 2022 through September 2023,
21 my firm has worked more than 130.3 hours prosecuting these claims with the attorneys' hourly fee rates
22 for attorneys at \$375-\$575, resulting in the current lodestar. A detailed breakdown of the total fees and
23 the services performed by the firm on this case is attached hereto as Exhibit B.

24 5. Further, Class Counsel will be performing additional work, including drafting the motion
25 for final approval, motion for Class Counsel Award and Class Representative Award, attending the
26 hearing on final approval, finalizing the orders and judgment, and monitoring completion of the
27

settlement process. I expect this additional work will result in an additional 30-40 hours of additional work and an additional lodestar between \$15,000 and \$20,000.

6. The rates charged by my firm are in line with the prevailing rates of attorneys in the local legal community for similar work and, if this were a commercial matter, these are the charges that would be made and presented to the client. These hourly rates have been approved by Court's throughout California, including the Courts in the Superior Court of California. Finally, the reasonableness of Counsel's hourly rates is further confirmed by comparing such rates with the rates of comparable counsel practicing complex and class litigation as detailed in the National Law Journal Billing Survey. See e.g. *Zest IP Holdings, LLC v. Implant Direct MFG, LLC*, 2014 U.S. Dist. LEXIS 167563 (S.D. Cal. 2014) (finding that "Mayer Brown's \$775 average billing rate for partners" and "Mayer Brown's \$543 average associate billing rate" are reasonable rates when compared within 21 other firms practicing in the Southern District of California). This survey is useful to show that Counsel's rates are in line with the comparable rates of the defense counsel that opposes these types of class claims, such as Mayer Brown. In another example, Sheppard Mullin Richter & Hampton, who is opposing counsel in many cases prosecuted by Counsel charges rates as high as \$875 for partners and \$535 for associates. Similarly, Paul Hastings, another opposing counsel in these types of cases, charges between \$900 and \$750 for partners and \$755 and \$335 for associates. Thus, the rates charged by Counsel for comparable work are less than these examples and are therefore undoubtedly reasonable.

7. As part of the Settlement Agreement, the parties agreed that Counsel may seek reimbursement of expenses incurred as documented in Counsel's billing records as part of the Counsel Award. Attached hereto as Exhibit C is a true and correct copy of the Zakay Law Group, Cost Summary detailing the actually incurred litigation expenses by the Zakay Law Group APLC, for this matter as of September 20, 2023. As shown in detail in the attached Cost Summary, the Zakay Law Group incurred a total of \$4,452.76 in litigation costs prosecuting this action— with additional costs anticipated.

8. These litigation expenses include the expenses incurred for mediation fees, expert costs and filing fees, all of which are costs normally billed to and paid by the client. The costs were

1 reasonably incurred by Counsel in the prosecution of this matter and are set forth in detail in the
2 contemporaneous billing records attached hereto.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing is
4 true and correct. Executed this 21st day of September 2023, at San Diego, California.

5
6 By: 
7 Shani O. Zakay

EXHIBIT A

1. Firm Practice Areas:

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

2. Attorney Shani O. Zakay Biography:

• **PRACITCE AREAS**

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, Civil Litigation, Business Litigation, Corporate/Business General Counsel Advice.

• **BAR ADMISSIONS, MEMBERSHIPS & BOARDS**

State of California (all courts)

United States District Court for the District of California (all courts)

• **PROFESSIONAL EXPERIENCE**

ZAKAY LAW GROUP, APLC, San Diego, CA

Founder, April 2018

SILLDORF LAW, LLP, San Diego, CA (now known as Berding & Weil)

Partner, January 2012 – March 2018

• **EDUCATION**

CALIFORNIA WESTERN SCHOOL OF LAW, San Diego, CA

Juris Doctor, *magna cum laude*, April 2011

Honors: Dean's List: Spring 2009, Fall 2009, Spring 2010, Fall 2010, Spring 2011.

Academic Achievement Awards: Advanced Legal Research, Constitutional Law II, Criminal Procedure, Insurance Law & Litigation, Law Office Technologies, Property II, Products Liability, Trusts & Estates.

Activities: Associate Editor, *California Western Law Review*

Legal Skills Honor Instructor for Professor Leslie Culver

Vice President, Jewish Student Union

SAN DIEGO STATE UNIVERSITY, San Diego, CA

Bachelor of Science, Business Administration, Management, *cum laude*, May 2008

Honors: Dean's List: Spring 2007 and Fall 2007

• **COMMUNITY SERVICE**

CALIFORNIA WESTERN SCHOOL OF LAW, San Diego, CA

Spring 2016, 2018

Moot Court Judge

COMMUNITY LAW PROJECT, San Diego, CA

October 2018 – Present

Volunteer Attorney on Employment Matters

3. Attorney Jackland K. Hom Biography:

• **PRACTICE AREAS**

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

• **BAR ADMISSIONS, MEMBERSHIPS & BOARDS**

State of California (all courts)

United States District Courts of California (all courts)

- **PROFESSIONAL EXPERIENCE**

ZAKAY LAW GROUP, APLC, San Diego, CA
Associate, January 2021 - present

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP, San Diego, CA
Associate, November 2019 – September 2020

- **EDUCATION**

CALIFORNIA WESTERN SCHOOL OF LAW, San Diego, CA
Juris Doctor, April 2019

Honors: Dean's List: Fall 2017, Spring 2018.

Academic Achievement Awards: Advanced Prosecution Function.

Activities: Senior Editor, *California Western Law Review*

President, Asian Pacific American Law Students Association

UNIVERSITY OF CALIFORNIA, RIVERSIDE, Riverside, CA
Bachelor of Arts: Political Science, English Literature, June 2015
Honors: Dean's List

4. **Attorney Julieann Alvarado Biography:**

- **PRACTICE AREAS**

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

- **BAR ADMISSIONS, MEMBERSHIPS & BOARDS**

State of California (all courts)

- **PROFESSIONAL EXPERIENCE**

ZAKAY LAW GROUP, APLC, San Diego, CA
Associate, January 2022 – present

GOMEZ TRIAL ATTORNEYS, San Diego, CA
Trial Attorney, January 2021 – December 2021

- **EDUCATION**

UNIVERSITY OF SAN DIEGO SCHOOL OF LAW, San Diego, CA

Juris Doctor, *cum laude*, May 2020

Honors: Dean's Honor Scholarship Recipient (Renewed as 2L and 3L)

CALI Excellence for the Future Award: Legal Writing and Research I

Activities: President of External Affairs, Consumer Attorneys of USD
Competing Member, USD National Mock Trial Team

UNIVERSITY OF SOUTHERN CALIFORNIA, Los Angeles, CA

Bachelor of Arts: Psychology, *magna cum laude*, May 2017

Honors: Presidential Scholarship Recipient

Dean's List: Spring 2015-Spring 2017

5. **Attorney Jaclyn Joyce Biography:**

• **PRACTICE AREAS**

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, PAGA Litigation.

• **BAR ADMISSIONS, MEMBERSHIPS & BOARDS**

State of California (all courts)

• **PROFESSIONAL EXPERIENCE**

ZAKAY LAW GROUP, APLC, San Diego, CA
Associate, March 2023 – present

LIGHTGABLER, Camarillo, CA
Attorney, April 2019 – February 2023

WESTON & McELVAIN (now called Weston & Agness LLP), Los Angeles, CA
Attorney, June 2016 – April 2019

• **EDUCATION**

UCLA SCHOOL OF LAW, Los Angeles, CA

Juris Doctor, *May 2012*

NORTHWESTERN UNIVERSITY, Chicago, IL

Bachelor of Arts: Political Science; Bachelor of Arts: Psychology, 2005

6. **Lead Counsel – Class Action & Representative Cases:**

1. **Hubscher v. Bodyspirit, LLC**

Court	San Diego
Case No.	37-2016-00021261-CU-OE-CTL
Nature	Independent Contractor Misclassification
Status	Settled

2. **Henry v. InMotion Entertainment Group, LLC**

Court	San Francisco
Case No.	CGC-18-565643
Nature	Meal/Rest Break claims and overtime and regular rate claims
Status	Settled

3. **Moore v. Zirx Transportation**

Court	San Francisco
Case No.	CGC-18-566655
Nature	Independent Contractor Misclassification
Status	Settled

4. **Pasallo v. GSG Protective Services**

Court	San Diego
Case No.	37-2018-00037611-CU-OE-CTL
Nature	Meal/Rest Break claims
Status	Settled

5. Villaroman v. C.C.H.C.

Court	Orange County
Case No.	30-2018-01013128-CU-OE-CXC
Nature	Meal/Rest Break claims
Status	Settled

6. Flores v. Plastic Express

Court	Los Angeles
Case No.	BC719071
Nature	Meal/Rest Break and minimum wage claims
Status	Settled

7. Tressler v. Spoonful Management

Court	Los Angeles
Case No.	BC719405
Nature	Meal/Rest Break claims
Status	Settled

8. Leymaster v. Toms Sierra Company, Inc.

Court	Placer
Case No.	SCV0041735
Nature	Meal/Rest Break claims and overtime and regular rate claims
Status	Settled

9. Murphy v. Rockler Retailer Group, Inc.

Court	Sacramento
Case No.	34-2018-00241374
Nature	Overtime and regular rate claims and wrongful termination
Status	Settled

10. Bruemmer v. Tempur Retail Stores, LLC.

Court	Marin
Case No.	CIV1803646
Nature	Overtime and regular rate claims and wrongful termination
Status	Settled

11. Christina Cummings v. G6 Hospitality, LLC

Court	San Diego
Case No.	37-2018-00056207-CU-OE-CTL 19CV122 GPC LL
Nature	Overtime and Minimum Wage claims and Meal and Rest Breaks
Status	Settled

12. Nicolai Laguatan v. Prevent LSS

Court	San Diego
Case No.	37-2018-00057434-CU-OE-CTL
Nature	Overtime and Minimum Wage claims and Meal and Rest Breaks
Status	Settled

13. Lisa Ramirez v. Carefusion Resources, LLC

Court	San Diego
Case No.	37-2018-00058078-CU-OE-CTL 3:18-CV-02852-BEN-MSB
Nature	Overtime and Meal and Rest Breaks
Status	Settled

14. Charles Ornelas v. C&A Transportation Services

Court	San Diego
Case No.	37-2018-00061289-CU-OE-CTL
Nature	Minimum Wage and Meal/Rest Break claims
Status	Settled

15. Luz Marin v. California Marine Cleaning

Court	San Diego
Case No.	37-2018-00063483-CU-OE-CTL
Nature	Meal Break claims
Status	Settled

16. Christian Van Cleave v. Sunrise Senior Living Management

Court	San Diego
Case No.	37-2018-00061960-CU-OE-CTL 19CV0044BEN NLS
Nature	Regular rate and meal premium miscalculation
Status	Settled

17. Heather McIntyre v. JRR Enterprises

Court	Sacramento
Case No.	34-2019-00251220
Nature	Overtime and Meal and Rest Periods
Status	Settled

18. Lori Phipps v. Soapy Joe's

Court	San Diego
Case No.	37-2019-00017673-CU-OE-CTL
Nature	Tip Polling and Meal and Rest Periods
Status	Settled

19. Heather Broughton v. NFG San Francisco, LLC

Court	San Francisco
Case No.	CGC-19-574657
Nature	Meal and Rest Breaks
Status	Settled

20. Marcos Antonios v. Interface Rehab, LLC

Court	Orange County
Case No.	30-2019-01067547-CU-OE-CXC
Nature	Meal and Rest Breaks and Reporting Time Violations
Status	Settled

21. Tiffany Rodriguez v. Circle K

Court	Riverside
Case No.	RIC 1901407 5:19-cv-00469
Nature	Overtime Wage and Meal/Rest Break claims
Status	Settled

22. Derik Scott et al. v. Ultimate Performance

Court	Los Angeles
Case No.	19STCV22823
Nature	Piece Rate Pay violations
Status	Settled

23. Raymond Frazier v. Asa Carlton

Court	San Diego
Case No.	37-2019-00036147-CU-OE-CTL
Nature	Overtime Wages
Status	Settled

24. John Moreno v. Da Kitchen

Court	San Diego
Case No.	37-2019-00024885-CU-OE-CTL
Nature	Overtime Wage and Meal/Rest Break claims
Status	Settled

25. Penny Lane v. International Aero Clubs, LLC

Court	San Diego
Case No.	37-2019-00021793-CU-OE-CTL
Nature	Meal and Rest Breaks and Regular Rate Miscalculation
Status	Settled

26. Amber Price v. DMSD Restaurants

Court	San Diego
Case No.	37-2019-00024062-CU-OE-CTL
Nature	Meal and Rest Break violations
Status	Settled

27. Jamaal Johnson v. Volt Management Corp

Court	Los Angeles
Case No.	19STCV16466
Nature	On Duty Meal Break violations
Status	Settled

28. Ezzat Menias v. All American Private Security

Court	Orange County
Case No.	30-2019-01085120-CU-OE-CXC
Nature	On Duty Meal Break violations
Status	Settled

29. Mark Connor v. Ascendant Marketing

Court	San Diego
Case No.	37-2019-00026864-CU-OE-CTL
Nature	Minimum Wage violations
Status	Settled

30. Niki Nunez v. Home Depot

Court	San Joaquin
Case No.	STK-CV-406-2019-6656
Nature	Overtime Wages violations
Status	In Litigation

31. Alma Salazar v. Frontier Toyota

Court	Los Angeles
Case No.	19STCV20382
Nature	Rest Break violations
Status	Settled

32. Josefina Garces v. Kar Auction Services

Court	Los Angeles
Case No.	19STCV28489
Nature	Rest Break violations
Status	Settled

33. Madison Weiss v. Niznik Behavior

Court	San Diego
Case No.	37-2019-00039441-CU-OE-CTL
Nature	Meal and Rest Break violations
Status	Settled

34. Jimmy Mack v. ERM Enterprises

Court	Sacramento
Case No.	2019-00262259
Nature	Meal and Rest Break violations
Status	Settled

35. Josefina Garces v. DriverDo

Court	Los Angeles
Case No.	19STCV32773
Nature	Independent Contractor Misclassification
Status	In Litigation

36. Perseus Porras v. Tantalum Restaurant

Court	Los Angeles
Case No.	19STCV31015
Nature	Unpaid Wages + Missed Meal/Rest Breaks
Status	Settled

37. Dorcena Deutsch v. Scripps

Court	San Diego
Case No.	37-2019-00036333-CU-OE-CTL
Nature	Regular Rate Miscalculation for Nurses
Status	Settled

38. Josalyn O'Quinn v. Laugh Factory

Court	Los Angeles
Case No.	19STCV28155
Nature	Regular Rate Miscalculation, Wage Theft
Status	In Litigation

39. Nicholas Leon v. Miller Event Management

Court	San Luis Obispo
Case No.	19CV-0435
Nature	Meal/Rest Breaks, Reporting Time, 2802
Status	Settled

40. Aaris Watts v. TRL Systems

Court	Orange County
Case No.	30-2019-01102457-CU-OE-CXC
Nature	Meal/Rest Breaks, Reporting Time
Status	Settled

41. Faith Smith v. Island Pizza

Court	Contra Costa
Case No.	MSC19-01654
Nature	Meal/Rest Breaks, 226, 2802
Status	Settled

42. Johnathan Roa v. Otay Mesa Sales

Court	San Diego
Case No.	37-2019-00057735-CU-OE-CTL
Nature	Meal/Rest Breaks, 226
Status	Settled

43. Sabrina Ivon v. Sinclair Television of California

Court	Humboldt
Case No.	DR190699
Nature	Vaquero
Status	Settled

44. Jonathan Mitchell v. Mack Trucking

Court	San Bernardino
Case No.	CIVDS1928334
Nature	Independent Contractor Misclassification
Status	In Litigation

45. Curtis Edwards v. Resolve Group

Court	San Francisco
Case No.	CGC-19-579095
Nature	Meal & Rest Breaks + 2802
Status	In Litigation

46. Elena Kiseleva v. TotalMed Staffing, Inc

Court	Santa Clara
Case No.	19CV354635
Nature	Overtime + Meal and Rest Breaks
Status	Settled

47. Richard Jer Vang v. Bridge Property Management

Court	Alameda
Judge	Winfred Smith
Nature	Off the clock work, regular rate miscalc.
Status	Settled

48. Madison Marrero v. Stat Med

Court	Alameda
Case No.	HG19043214
Nature	Unpaid Overtime + Meal/Rest Breaks
Status	In Litigation

49. Brian Reyes v. Stowasser Buick-GMC

Court	Santa Barbara
Case No.	19CV06183
Nature	Vaquero
Status	Settled

50. Erik Foss v. Anderson Hospitality, Inc.

Court	Shasta
Case No.	195317
OPC	Wood Smith – Andrew Kleiner
Nature	Meal and Rest Breaks, Regular Rate
Status	In Litigation

51. Griselda Duran v. EmployBridge

Court	Kern
Case No.	BCV-20-101583
Nature	Regular Rate, 226
Status	In Litigation

52. Luis Rendon v. Healthcare Investments, Inc.

Court	Los Angeles
Case No.	20STCV39775
Nature	Meal and Rest Breaks
Status	In Litigation

53. Richard Melead v. TVI, Inc.

Court	Orange
Case No.	30-2020-01140887-CU-OE-CXC
Nature	Regular Rate, 226 (Magadia)
Status	Settled

54. David Spencer v. Asset Gas, Inc.

Court	San Diego
Case No.	37-2020-00024642-CU-OE-CTL
Nature	Meal and Rest Breaks
Status	Settled

55. Thomas Haven v. California Vocations, Inc.

Court	Butte
Case No.	20CV01514
Nature	Regular Rate + Meal and Rest Breaks
Status	In Litigation

56. Estefania Renteria v. Love's Country

Court	Kern
Case No.	BCV-20-101260
Nature	226
Status	In Litigation

57. Rachel Latin v. OneMain General Services Corp.

Court	Stanislaus
Case No.	CV-20-002498
Nature	Dart + Magadia
Status	In Litigation

58. Kalaina Dula v. 2 Kings Gaming, Inc.

Court	Merced
Case No.	#20CV-02289
Nature	Meal and Rest Breaks
Status	In Litigation

59. Jie Xu v. HT Multinational

Court	San Bernardino
Case No.	CIV-DS2015679
Nature	Exempt Misclassification
Status	In Litigation

60. Yvette Molina v. Hawaiian Airlines

Court	Los Angeles
Case No.	20STCV28079
Nature	Meal and Rest + Magadia
Status	In Litigation

61. Reinald Pillsbury v. T & T Restaurants CA

Court	Del Norte
Case No.	CVUJ-2020-1214
Nature	Meal/Rest Breaks + Regular Rate
Status	Settled

62. Luis de Jesus v. Guardian Angel Home Care

Court	San Diego
Case No.	37-2020-00021049-CU-OE-CTL
Nature	Piece-Rate
Status	In Litigation

63. Charles Sandlin v. Secure Nursing Services, Inc.

Court	Los Angeles
Case No.	20STCV25675
Nature	Regular Rate
Status	Settled

64. Gabriel Mendez v. Bondz, Inc.

Court	San Joaquin
Case No.	STK-CV-UOE-2020-0007486
Nature	Piece-Rate
Status	In Litigation

65. James Conley v. Siskiyou Forest Products

Court	Shasta
Case No.	195819
Nature	Regular Rate and Meal/Rest Breaks + 226
Status	In Litigation

66. Alex Castellanos v. Southwest Patrol

Court	San Diego
Case No.	37-2020-00024905-CU-OE-CTL
Nature	Augutus
Status	Settled

67. Damien Hampton v. Pegasus Investors

Court	Sacramento
Case No.	34-2020-00281394-CU-BT-GDS
Nature	Unlawful Housing
Status	In Litigation

68. Tamara Perkins v. FSEI

Court	Sacramento
Case No.	34-2020-00287054
Nature	Regular Rate
Status	Settled

69. Rodney Stovall v. Javelin Logistics Company

Court	Alameda
Case No.	RG20075705
Nature	Meal / Rest Breaks
Status	In Litigation

70. Gabrielle Boyd v. Bluestone Lane Holdings, LLC

Court	San Francisco
Case No.	CGC-20-585787
Nature	Tip Pooling ; Magadia
Status	Settled

71. Elias Kaser v. Aviation Consultants, Inc.

Court	Orange County
Case No.	
Nature	Meal / Rest Breaks, Regular Rate
Status	Settled

72. Christopher Chacon v. Panda Motors, Inc.

Court	San Bernardino
Case No.	CIV DS2022220
Nature	Regular Rate
Status	In Litigation

73. Willie Lang v. Pathways

Court	San Diego
Case No.	37-2019-00049969
Nature	Off the Clock
Status	In Litigation

74. Norma Reyes v. Simpson Garden Grove, Inc.

Court	Orange
Case No.	30-2020-0117564-CU-OE-CJC
Nature	Meal / Rest Breaks
Status	Settled

75. Daniel Jacobs v. Rush Media Company

Court	Los Angeles
Case No.	20STCV32350
Nature	Independent Contractor Misclassification
Status	Litigation

76. Luis Ledesma v. TVJ Sons I, Inc.

Court	Santa Barbara
Case No.	20CV03573
Nature	Vaquero
Status	Settled

77. Kevin Cianfarani v. Career Strategies Temporary, Inc. (MPI)

Court	Los Angeles
Case No.	
Nature	Off the clock work
Status	Settled

78. Hector Avitia v. LAZ Parking

Court	San Diego
Case No	37-2020-00030133-CU-OE-CTL
Nature	Magadia + Augustus
Status	Litigation

79. Sukhraj Kaur v. ACES 2020, LLC

Court	Contra Costa
Case No.	C20-02482
Nature	Meal/Rest Breaks, 2802
Status	Litigation

80. Boaventura v. Rei Do Gado

Court	Contra Costa
Case No.	37-2020-00032342-CU-OE-CTL
Nature	Meal/Rest Breaks, 2802
Status	Litigation

81. James Rachal v. ELG Metals, Inc.

Court	Los Angeles
Case No.	20STCV45861
Nature	Meal/Rest Breaks, Regular Rate
Status	Litigation

82. Evelyn Nwansi v. Princeton Healthcare Center, LLC

Court	Alameda
Case No.	RG20083664
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	Litigation

83. Michael Ashlock v. Advantis Medical Staffing

Court	San Diego
Case No.	37-2020-00022305-CU-OE-CTL
Nature	Regular Rate
Status	Settled

84. Moe Popal v. Ameriprise Auto & Home Insurance

Court	Riverside
Case No.	RIC2000006
Nature	Exempt/Non-Exempt Misclassification
Status	Settled

85. Mark Williams v. Web to Door

Court	San Francisco
Case No.	CGC-20-588382
Nature	Meal and Rest Break + Regular Rate
Status	Litigation

86. Jessica Barackman v. Teaz N Pleaz, Inc.

Court	El Dorado
Case No.	SC20200179
Nature	Meal/Rest Breaks, Seating
Status	Settled

87. Nicolas Neutall v. Urban Alchemy

Court	San Francisco
Case No.	CGC-20-588622
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

88. Courteney Arneson v. Bahn Thai, Inc.

Court	Sacramento
Case No.	34-2021-00295429
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	Settled

89. Carlos Cortez v. M & M Automotive Group, LLC.

Court	Alameda
Case No.	HG21086853
Nature	Violation of PAGA
Status	In Litigation

90. Christian Soltero v. Summit Pizza West, LLC

Court	San Diego
Case No.	37-2021-00001288-CU-OE-CTL
Nature	Meal/Rest Breaks, 2698
Status	Settled

91. Traci Pollinger v. Hoehn Motors, Inc.

Court	San Diego
Case No.	37-2021-00003888-CU-OE-CTL
Nature	Violation of PAGA
Status	In Litigation

92. Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC

Court	Orange
Case No.	30-2021-01181315-CU-OE-CXC
Nature	Violation of PAGA
Status	In Litigation

93. Shasta Collins v. Hilton Management, LLC

Court	San Francisco
Case No.	CGC-21-590959
Nature	Violation of PAGA
Status	In Litigation

94. Amanda Hernandez v. Parenting Network, Inc.

Court	Tulare
Case No.	VCU287027
Nature	Meal/Rest Breaks, PAGA
Status	In Litigation

95. Richard Sanchez v. Salinas Lincoln Mercury, Inc.

Court	Monterey
Case No.	21CV001535
Nature	Violation of PAGA
Status	In Litigation

96. Doretha Jackson v. White Fir Holdings, LLC dba Midtown Oaks Post-Acute

Court	Sacramento
Case No.	34-2021-00301656
Nature	Meal/Rest Breaks, PAGA
Status	In Litigation

97. Gabriel Guzman Jr. v. Vulcan Materials Company

Court	San Diego
Case No.	30-2021-00052064-CU-OE-CTL
Nature	Violation of PAGA
Status	In Litigation

98. Pedro Rodriguez v. R.M. Parks Place, Inc.

Court	San Joaquin
Case No.	STK-CV-UOE-2021-0006050
Nature	Meal/Rest Breaks, PAGA
Status	In Litigation

99. Michael Harrington v. Genesis Private Security, Inc.

Court	Alameda
Case No.	RG21105476
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

100. David Ezell v. Diab Leasing, Inc.

Court	Sacramento
Case No.	34-2021-00305329
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

101. Joe Moreno v. Rambo, LLC

Court	San Francisco
Case No.	CGC-21-590959
Nature	Violation of PAGA
Status	In Litigation

102. Noemy Flores v. Aven Group, Inc.

Court	Los Angeles
Case No.	21STCV36642
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

103. Bria Ware v. Shake Shack Enterprise, LLC.

Court	Alameda
Case No.	21CV002063
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

104. Latisha Anderson v. Barton Meyers Associates, Inc.

Court	Los Angeles
Case No.	21STCV43314
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

105. Eduardo Ybarra v. Helzberg's Diamond Shops, LLC

Court	Alameda
Case No.	21CV003531
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

106. Jermell Jones v. Greenlawn Funeral Homes

Court	Kern
Case No.	BCV-21-102356
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

107. Chanda Young v. Breakfast Republic

Court	Los Angeles
Case No.	21SMCV01447
Nature	2699, 201, 202, 203
Status	In Litigation

108. Jesus Marin v. Chipotle Services, LLC.

Court	San Diego
Case No.	37-2021-00051618
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

109. Daniel Rosas v. WSD Engineering, Inc.

Court	Alameda
Case No.	RG21086699
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

110. Isaiah Davis v. RPM Juice, Inc.

Court	San Francisco
Case No.	21STCV14755
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

111. Amanda Hernandez v. Parenting Network

Court	San Joaquin
Case No.	VCU287027
Nature	Meal/Rest Breaks, Wage Statement Violations, PAGA
Status	Settled

112. Christiane Hilden v. Oakwood Village, Inc.

Court	Placer
Case No.	S-CV-0046676
Nature	PAGA
Status	Settled

113. Jose Garcia v. Ferma Greenbox

Court	Alameda
Case No.	RG21101104
Nature	Unpaid Wages, PAGA
Status	Settled

114. Brittney Jones v. ASD6

Court	San Diego
Case No.	37-2021-00016864-CU-OE-CTL
Nature	PAGA
Status	Settled

115. Richard Sanchez v. Salinas Lincoln Mercury

Court	Monterey
Case No.	21CV001535
Nature	PAGA
Status	In Litigation

116. Melina Wilson v. Spreen Honda

Court	San Bernardino
Case No.	CIVSB2119857
Nature	PAGA
Status	Settled

117. Anthony Lopez v. Ferro Automotive

Court	Solano
Case No.	FCS056580
Nature	PAGA
Status	In Litigation

118. Michael Nash v. K. Hovnanian

Court	Riverside
Case No.	RIC2003319
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

119. Katsiaryna Karnachova v. INTO North America, Inc.

Court	San Diego
Case No.	37-2021-00023758-CU-OE-CTL
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

120. Doretha Jackson v. White Fir Holdings, LLC

Court	Sacramento
Case No.	34-2021-00301656
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

121. Emily Tolosa v. Kensington Redwood City, LLC

Court	San Mateo
Case No.	21-CIV-03030
Nature	Meal/Rest Breaks, Unlawful Rounding, Unpaid Overtime, PAGA
Status	In Litigation

122. Gabriel Guzman v. Vulcan Materials Company

Court	San Diego
Case No.	37-2021-00024583-CU-OE-CTL
Nature	Unpaid Wages, PAGA
Status	Settled

123. Cristal Rodriguez v. EAH , Inc.

Court	Santa Cruz
Case No.	21CV00884
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

124. Natalie Chrestensen v. Northeastern Rural Health Clinics

Court	Lassen
Case No.	63703
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

125. Khozama Almahdi v. Vitamin Shoppe Industries

Court	Santa Clara
Case No.	20CV365150
Nature	PAGA
Status	Settled

126. Omar Vejar v. Fineline Woodworking, Inc.

Court	Orange
Case No.	30-2021-01208607-CU-OE-CXC
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

127. Janelle Harris v. 7Cuts, LLC

Court	Contra Costa
Case No.	MSC21-01375
Nature	Meal/Rest Breaks, Wage Statement Violations, PAGA
Status	Settled

128. Claudia Nunez v. The Whole Child

Court	Los Angeles
Case No.	21STCV25160
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

129. Jaqueline Nayyar v. Pizza Investment Entrepreneurs, LLC

Court	Solano
Case No.	FCS056804
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

130. Michael Harrington v. Genesis Private Security

Court	Alameda
Case No.	RG21105476
Nature	PAGA
Status	In Litigation

131. Robert Baray v. Curation Foods

Court	Santa Barbara
Case No.	21CV2834
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

132. James Aguilar v. T & K

Court	Santa Clara
Case No.	21CV384674
Nature	Meal/Rest Breaks, Unpaid Overtime, Untimely Payment of Wages, PAGA
Status	Settled

133. Arthur Gutierrez v. Anning Company

Court	Los Angeles
Case No.	21PSCV00785
Nature	Unpaid Wages, PAGA
Status	In Litigation

134. Pedro Rodriguez v. RM Parks

Court	San Joaquin
Case No.	STK-CV-UOE-2021-0006050
Nature	Unpaid Wages, Wage Statement Violations, PAGA
Status	Settled

135. Phillip Soto v. Niki Investments

Court	Orange
Case No.	30-2021-01213064-CU-OE-CXC
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

136. David Ezell v. Diab Leasing

Court	Sacramento
Case No.	2021-305329
Nature	Meal/Rest Breaks, Unpaid Overtime, Wage Statement Violations, PAGA
Status	Settled

137. John Icabalceta v. Integrated Protection Corp.

Court	Los Angeles
Case No.	21STCV28920
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

138. Jose Garcia v. Pacific Shellfish Inc.

Court	San Diego
Case No.	37-2021-00021898-CU-OE-CTL
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

139. Geneva Putman v. Winco Holdings, Inc.

Court	Sacramento
Case No.	2:21-cv-01760-MCE-JDP
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

140. Alahjah Brown v. NRI USA, Inc.

Court	San Bernardino
Case No.	CIVSB0228407
Nature	PAGA
Status	Settled

141. Isabella Ruiz v. Tiwana & Sons, Inc.

Court	San Joaquin
Case No.	STK-CV-400-2021-6420
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	Settled

142. Tausha Griswold v. Savings Bank of Menocino County

Court	Mendocino
Case No.	21CV00670
Nature	Wage Statement Violations, PAGA
Status	Settled

143. Dino Desanctis v. Douglas Products and Packaging Company, LLC

Court	Contra Costa
Case No.	C21-01874
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

144. Joe Moreno v. Rambo, LLC.

Court	San Diego
Case No.	37-2021-00038129-CU-OE-CTL
Nature	PAGA
Status	Settled

145. Sara Chiu v. Cornish & Carey (NewMark)

Court	Alameda
Case No.	34-2021-00295429
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	Settled

146. Norman Respass v. The Scion Group

Court	Eastern District
Case No.	2:20-cv-02307-MCE-JDP
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

147. Jalil Hasim v. The Davey Tree Expert Company

Court	San Francisco
Case No.	CGC-21-595544
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

148. Devin Terrel v. KaiserAir

Court	Alameda
Case No.	RG21113701
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

149. Michelle Lee v. Aveanna Healthcare AS, LLC

Court	Santa Clara
Case No.	21CV387081
Nature	PAGA
Status	Settled

150. Annklein Pacia v. Kilroy Realty, L.P.

Court	Los Angeles
Case No.	21STCV20624
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA, FCRA
Status	Settled

151. Lydia Wedan v. Lakeport Post Acute, LLC

Court	Lake
Case No.	CV-422113
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	Settled

152. Dante Henderson v. Bizon Group, Inc.

Court	Alameda
Case No.	HG21115170
Nature	Wage Statement Violations, Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

153. Noemy Flores v. Aven Group, Inc.

Court	Los Angeles
Case No.	21STCV36642
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

154. Alissa Whitney v. Five J's Family Enterprises

Court	San Bernardino
Case No.	CIVSB 2129063
Nature	Meal/Rest Breaks, Unpaid Overtime, Unlawful Rounding, PAGA
Status	Settled

155. Ricardo Rodriguez v. Employbridge

Court	Ventura
Case No.	56-2021-00559039-CU-OE-VTA
Nature	PAGA
Status	In Litigation

156. Amanda Patterson v. RCSH Operations, Inc.

Court	Contra Costa
Case No.	MSC21-02077
Nature	Wage Statement Violations, Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

157. Tyra Toler v. Total Testing Solutions LLC

Court	Los Angeles
Case No.	21STCV38452
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

158. Juanita Allen v. Nissan of Stockton

Court	San Joaquin
Case No.	STK-CV-UOE-2021-8956
Nature	PAGA
Status	In Litigation

159. Bria Ware v. Shake Shack

Court	Alameda
Case No.	21CV002063
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	Settled

160. Paola Villalvazo v. SK Market Inc.

Court	Los Angeles
Case No.	21STCV39911
Nature	PAGA
Status	In Litigation

161. Luke Delacruz v. Walmart (Bonobos)

Court	San Diego
Case No.	37-2021-00046421-CU-OE-CTL
Nature	Meal/Rest Breaks, Unpaid Overtime, PAGA
Status	In Litigation

162. Tanya Ripley v. Cerner Corp.

Court	Placer
Case No.	S-CV-0045961
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	Settled

EXHIBIT B

Activities Export

09/21/2023

11:50 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/20/2022		Review file, legal research on potential claims, and work on complaint  Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	5.80h	\$375.00	-	\$2,175.00
01/26/2022		Call w/ client to discuss complaint  Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
01/30/2022		Review the file. Review all documents and multiple calls with the client to discuss claims.  Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	5.00h	\$550.00	-	\$2,750.00
01/30/2022		Review and revise the complaint.  Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	3.00h	\$550.00	-	\$1,650.00
01/30/2022		Review and revise the PAGA letter.  Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
02/02/2022		Cresting Clio and adding all documents.  Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Donia Saadi	1.00h	\$165.00	-	\$165.00
02/02/2022		Review and revise PAGA letter  Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
02/02/2022		Emails w/ attorneys re follow-up from call with client  Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
02/03/2022		Emails w/ attorneys re complaint	45701-Villa	Jackland	0.20h	\$375.00	-	\$75.00
					130.30h		\$0.00 0.00h	\$61,824.00 130.30h

Activities Export

09/21/2023

11:50 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		venue ● Unbilled	Manuel Villa v. Trillium Pumps USA, Inc.	Hom				
04/10/2022	🕒	More work on the complaint and instruct on filing. ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.50h	\$550.00	-	\$825.00
04/11/2022	🕒	Filing complaint on OneLegal. ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Donia Saadi	1.00h	\$165.00	-	\$165.00
04/11/2022	🕒	Finalize complaint for filing ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.80h	\$375.00	-	\$300.00
04/13/2022	🕒	Filing complaint and sending to Knox for service. ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Donia Saadi	1.00h	\$165.00	-	\$165.00
06/04/2022	🕒	Review Defendant's Answer. Review and legal research various affirmative defenses. ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	3.50h	\$550.00	-	\$1,925.00
06/05/2022	🕒	Review DEF's Answer and legal research on asserted affirmative defenses ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	1.20h	\$375.00	-	\$450.00
06/16/2022	🕒	Call with OPC and call with co-counsel to follow up. ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
07/09/2022	🕒	Emails regarding mediation. ● Unbilled	45701-Villa Manuel Villa v. Trillium	Shani Zakay	0.50h	\$550.00	-	\$275.00
					130.30h		\$0.00 0.00h	\$61,824.00 130.30h

Activities Export

09/21/2023

11:50 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Pumps USA, Inc.								
07/09/2022		Emails re reshceduling mediation ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
07/20/2022		More emails re rescheduling mediation ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
07/25/2022		Review and approve stipulation to continue CMC. Discuss with co- counsel. Call with client to provide an update. ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.50h	\$550.00	-	\$825.00
07/26/2022		Review DEF's Case Management Statement ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
07/26/2022		Review and revise Case Management Statement ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
08/02/2022		Review Court's Order continuing CMC pending mediation ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.20h	\$375.00	-	\$75.00
08/23/2022		Work on mediation data demand ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
09/29/2022		Review DEF's mediation production ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	2.20h	\$375.00	-	\$825.00
					130.30h		\$0.00 0.00h	\$61,824.00 130.30h

Activities Export

09/21/2023

11:50 AM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/13/2022	 	Call w/ client to provide case update ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
10/14/2022	 	Emails w/ client re mediation ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.20h	\$375.00	-	\$75.00
10/17/2022	 	Review's PLA's additional docs ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.80h	\$375.00	-	\$300.00
10/20/2022	 	Emails w/ attorneys re mediation brief ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
10/20/2022	 	Emails w/ OC re mediation data ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
10/21/2022	 	More emails w/ OC re mediation data ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
10/21/2022	 	Emails w/ attorneys re mediation data points ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
10/21/2022	 	Emails w/ expert re mediation damage model ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
10/22/2022	 	Emails w/ attorneys re work on mediation brief ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
					130.30h		\$0.00 0.00h	\$61,824.00 130.30h

Activities Export

09/21/2023

11:50 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/24/2022	 Unbilled	More review of DEF's mediation data	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	2.20h	\$375.00	-	\$825.00
10/25/2022	 Unbilled	Work on mediation brief and issues related to the claims.	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	4.00h	\$550.00	-	\$2,200.00
10/25/2022	 Unbilled	Call w/ client to discuss mediation	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
10/26/2022	 Unbilled	Review data produced for mediation. Multiple discussions with the expert. Review damage report and discuss necessary work for mediation with counsel and the expert.	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	5.00h	\$550.00	-	\$2,750.00
10/26/2022	 Unbilled	Work on mediation brief	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	6.00h	\$375.00	-	\$2,250.00
10/27/2022	 Unbilled	More work on the mediation brief.	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	5.00h	\$550.00	-	\$2,750.00
10/27/2022	 Unbilled	Legal research for mediation brief	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.80h	\$375.00	-	\$300.00
10/28/2022	 Unbilled	More work on mediation brief.	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.50h	\$550.00	-	\$825.00
					130.30h		\$0.00 0.00h	\$61,824.00 130.30h

Activities Export

09/21/2023

11:50 AM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/28/2022	 	Finalize mediation brief ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	1.00h	\$375.00	-	\$375.00
10/31/2022	 	Pre-mediation call with mediator. Follow up call with the client to provide a status update. ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.50h	\$550.00	-	\$825.00
11/01/2022	 	Review DEF's mediation brief ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	1.20h	\$375.00	-	\$450.00
11/02/2022	 	Prepare for and attend mediation. Work on MOU. ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	10.00h	\$550.00	-	\$5,500.00
11/02/2022	 	Prepare for and attend mediation. Work on MOU ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	10.00h	\$375.00	-	\$3,750.00
11/03/2022	 	Call with the client to go over MOU. Emails with co-counsel regarding status. ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
11/04/2022	 	More work on MOU ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.50h	\$550.00	-	\$825.00
11/15/2022	 	Review Court's Notice of CMC ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.10h	\$375.00	-	\$37.50
01/19/2023	 	Review Court's Notice of CMC	45701-Villa Manuel Villa v. Trillium	Jackland Hom	0.10h	\$395.00	-	\$39.50
					130.30h		\$0.00	\$61,824.00
							0.00h	130.30h

Activities Export

09/21/2023

11:50 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Pumps USA, Inc.					
01/23/2023	🕒	Review notice of reassignment and emails regarding the same. ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	0.30h	\$575.00	-	\$172.50
01/30/2023	🕒	Follow up on CMC and CMS ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	0.20h	\$575.00	-	\$115.00
01/30/2023	🕒	Review and revise Case Management Statement ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.30h	\$395.00	-	\$118.50
02/07/2023	🕒	Emails with co-counsel regarding joint report and CMC ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	0.20h	\$575.00	-	\$115.00
02/13/2023	🕒	Work on settlement agreement ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	1.20h	\$395.00	-	\$474.00
02/16/2023	🕒	Review and revise the class notice and exclusion form. ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.50h	\$575.00	-	\$862.50
02/16/2023	🕒	Review and revise Class Notice and Exclusion Form ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.50h	\$395.00	-	\$197.50
02/21/2023	🕒	Review Court's Order continuing CMC ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.10h	\$395.00	-	\$39.50
03/08/2023	🕒	Work on the SAR	45701-Villa	Shani	5.00h	\$575.00	-	\$2,875.00
					130.30h		\$0.00	\$61,824.00
							0.00h	130.30h

Activities Export

09/21/2023

11:50 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
	● Unbilled		Manuel Villa v. Trillium Pumps USA, Inc.	Zakay				
03/16/2023	⌚	Review fully executed SAR and instruct staff accordingly. Call and correspondence with client to provide a status update. ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.00h	\$575.00	-	\$575.00
06/27/2023	⌚	Work on MPA ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	1.80h	\$395.00	-	\$711.00
06/30/2023	⌚	Work with staff on MPA ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	2.50h	\$575.00	-	\$1,437.50
07/27/2023	⌚	Review and revise Joint Case Management Statement ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.20h	\$395.00	-	\$79.00
08/22/2023	⌚	Review jurisdictional requirements re seeking preliminary approval ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jaclyn Joyce	0.50h	\$495.00	-	\$247.50
09/04/2023	⌚	Review and approve the CMS ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	0.60h	\$575.00	-	\$345.00
09/06/2023	⌚	Review and revise Joint Case Management Statement ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.20h	\$395.00	-	\$79.00
09/13/2023	⌚	Review Complaint, SAR, MOU and mediation brief in preparation for drafting Motion for Preliminary	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jaclyn Joyce	3.40h	\$495.00	-	\$1,683.00
					130.30h		\$0.00	\$61,824.00
							0.00h	130.30h

Activities Export

09/21/2023

11:50 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Approval; Begin drafting Motion for Preliminary Approval. ● Unbilled						
09/13/2023	🕒	Draft declaration in support of Motion for Preliminary Approval ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jaclyn Joyce	0.80h	\$495.00	-	\$396.00
09/13/2023	🕒	Draft section of Motion for Preliminary Approval re overview of the litigation and Class Counsel's investigation of the claims ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jaclyn Joyce	3.20h	\$495.00	-	\$1,584.00
09/14/2023	🕒	Draft section of MPA re the class, the settlement consideration, the funding date, the formula for calculating the individual settlement payments, and the release by the class members and aggrieved employees ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jaclyn Joyce	3.10h	\$495.00	-	\$1,534.50
09/14/2023	🕒	Research case law in preparation for further drafting MPA ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jaclyn Joyce	0.80h	\$495.00	-	\$396.00
09/15/2023	🕒	Begin drafting argument section of MPA ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jaclyn Joyce	1.40h	\$495.00	-	\$693.00
09/15/2023	🕒	Further review expert report; draft section of MPA re valuation of claims	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jaclyn Joyce	3.40h	\$495.00	-	\$1,683.00
					130.30h		\$0.00 0.00h	\$61,824.00 130.30h

Activities Export

09/21/2023

11:50 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
09/15/2023	🕒	Draft section of MPA re PAGA settlement ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jaclyn Joyce	2.10h	\$495.00	-	\$1,039.50
09/18/2023	🕒	Further draft Argument section of MPA ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jaclyn Joyce	2.80h	\$495.00	-	\$1,386.00
09/18/2023	🕒	Review, revise and finalize MPA and supporting documents ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jaclyn Joyce	3.90h	\$495.00	-	\$1,930.50
09/19/2023	🕒	Telephone call with client ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jaclyn Joyce	0.40h	\$495.00	-	\$198.00
09/20/2023	🕒	Prepare for and attend CMC ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	0.50h	\$395.00	-	\$197.50
					130.30h		\$0.00 0.00h	\$61,824.00 130.30h

EXHIBIT C

Activities Export

09/21/2023

11:52 AM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/22/2022	\$	Knox Invoice Fee ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Donia Saadi	1.00	\$122.75	-	\$122.75
07/26/2022	\$	OneLegal - Stip ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Donia Saadi	1.00	\$37.32	-	\$37.32
07/27/2022	\$	OneLegal - CMS ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Donia Saadi	1.00	\$16.57	-	\$16.57
10/05/2022	\$	Mediation Fee ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.00	\$237.50	-	\$237.50
10/24/2022	\$	Mediation Fee ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.00	\$2,487.50	-	\$2,487.50
11/10/2022	\$	Expert Costs ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Shani Zakay	1.00	\$1,500.00	-	\$1,500.00
08/01/2023	\$	One Legal - Case Management Statement,Proof of Service ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Donia Saadi	1.00	\$17.04	-	\$17.04
09/07/2023	\$	One Legal ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	1.00	\$17.04	-	\$17.04
09/20/2023	\$	One Legal ● Unbilled	45701-Villa Manuel Villa v. Trillium Pumps USA, Inc.	Jackland Hom	1.00	\$17.04	-	\$17.04
							\$0.00 0.00h	\$4,452.76 0.00h