

Danny Yadidsion (SBN 260282)
LABOR LAW PC
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Attorneys for Plaintiff JOSE GOMEZ,
in a Representative capacity only, and on behalf of
other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF IMPERIAL

JULIA TORRES, JOY OLIVER BANKS,
and JOSE GOMEZ, in a Representative
capacity only, and on behalf of other
members of the general public similarly
situated

Plaintiffs,

vs.

MANAGEMENT & TRAINING
CORPORATION, a Delaware Corporation;
and DOES 1-10, inclusive

Defendants.

CASE NO.: ECU003320

*[Assigned for all purposes to the Honorable
Jeffrey B. Jones, El Centro Dept. 5]*

**DECLARATION OF DANNY YADIDSION
IN SUPPORT OF PLAINTIFFS' *UNOPPOSED*
MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF DANNY YADIDSION

I, Danny Yadidsion, declare as follows:

1. I am an attorney duly licensed to practice before all courts of the State of California. I am a shareholder of the law firm Labor Law PC and counsel of record for Plaintiff JOSE GOMEZ ("Plaintiff" or "Class Representative") and on behalf of other similarly situated employees of Defendants MANAGEMENT & TRAINING CORPORATION and related entities ("Defendants"). I and my firm

are referred to herein as Class Counsel. I have personal knowledge of the facts stated herein, and if called as a witness, I could and would competently testify.

2. My firm and I are well qualified to represent the Class. We are experienced employment lawyers and have prosecuted numerous wage-and-hour class actions in California, including claims involving unpaid wages, missed meal and rest periods, wage statement violations, and PAGA penalties. I exclusively practice employment law and am actively litigating several class actions at Labor Law PC. I have litigated numerous wage and hour class actions involving claims such as unpaid wages, failure to provide accurate wage statements, misclassification, waiting time penalties, and unfair competition. In all matters, the cases were handled as effectively as possible and novel issues constantly arose. In a case involving novel wage and hour issues, Judge R. Gary Klausner, US District Judge for the Central District of California, granted class certification of a nationwide class of over 1,000 employees and approved my request to be appointed as class counsel. (*Keith Ernst, et al. v. ZogSports Holdings LLC, et al.*, Case No. 2:18-cv-09043-RGK-MRW (C.D. Cal. February 21, 2019). Judge Klausner subsequently granted preliminary and final approval of the Parties' settlement. In a separate action, on July 14, 2020, the Court granted class certification and approved my request to represent a class of exempt employees whom Plaintiff alleges were misclassified. (*Archer v. Jack Nadel Inc.*, Los Angeles County Superior Court, Case No. 18STCV07761). In addition, I have been appointed as class counsel for purposes of settlement in other class actions including *Troy Richard Whitmark, et al. v. Altman Specialty Plants, Inc.* (San Diego County Superior Court, Case No. 37-2018-00055889-CU-OE-NC), *Antonio Llamas v. Mapfre Insurance & Subsidiaries, et al.* (Alameda County Superior Court, Case No. RG 18931346), *Joyce Patton, et al. v. All-City Management Services, Inc.* (Los Angeles County Superior Court, Case No. BC723958), *Rafael Becerra, Jr. v. Superior Home Design, Inc.* (Los Angeles County Superior Court, Case No. 19STCV17368), *Marie Barraza, et al. v. MOGA Transport, Inc.* (Kern County Superior Court, Case No. BCV-20-103017), *Walter Jimenez v. Bay Cities Partners, Inc.* (Los Angeles County Superior Court, Case No. 20STCV40788), *Carrie Baldwin v. Patagonia, Inc.* (Los Angeles County Superior Court, Case No. 20STCV40245), *Wess Neatherlin, et al. v. Zogsports Holding LLC* (Los Angeles County Superior Court, Case No. 20STCV21901), and *Alex Furtado v. Bamia 2, LLC* (Los Angeles County Superior Court, Case No. 21STCV37585).

1 3. Throughout my legal career, I have exclusively practiced employment law with a specific
2 focus on litigating wage and hour class actions. Prior to becoming a partner of Labor Law PC, I exclusively
3 practiced employment law for over nine years at defense firms. From approximately December 2011 to
4 September 2018, I exclusively practiced employment law and defended numerous class actions at Jackson
5 Lewis PC in Los Angeles. From June 2009 to December 2011, I exclusively practiced employment law
6 and defended numerous class actions at Lewis Brisbois Bisgaard & Smith LLP in Los Angeles. I
7 graduated from UCLA School of Law in May 2008. During law school, I also learned about litigating
8 wage and hour class actions while I worked at an employment litigation boutique firm (Gleason
9 & Favarote LLP). I have been responsible for numerous wage and hour class actions throughout the State
10 of California, in both state and federal courts. Throughout my legal career, I have been responsible
11 for all facets of class actions from the initial investigation of the allegations through successful resolution.
12 By way of example, shortly prior to leaving Jackson Lewis PC, I successfully prevailed on a motion for
13 class certification on behalf of my clients in a case heavily litigated for over 7.5 years and successfully
14 moved to dismiss a complaint in federal court based on the federal enclave doctrine. (See *Compton v.*
15 *American Management Services*, Los Angeles County Superior Court, Case No. BC 448343; *Issac Tafoya*
16 *v. AECOM, Inc. et al.*, Case No. 2:18-cv-04113-GW-PLA (C.D. Cal. June 15, 2018.)

17 4. My extensive experience in litigating employment wage and hour matters has been integral
18 in identifying legal issues, evaluating the strengths and weaknesses of a case, and generally
19 negotiating fair and reasonable class action settlements. Practice in the narrow field of wage and hour
20 litigation requires skill and knowledge concerning the constantly evolving substantive law (at the state
21 and federal level), as well as the procedural law of class action litigation. In this action, I am fully equipped
22 to use the skills and knowledge I have developed through prosecuting and defending wage and hour class
23 actions to fairly and adequately represent the interests of the Class. Therefore, on the account of my
24 resources, experience, and knowledge, I am well qualified to act as class counsel and represent the
25 Plaintiff and the putative class members in this action.

26 5. I am the founding partner of Labor Law PC. At over 17 years out of law school, my
27 applicable Laffey Matrix rate is \$1,019.00 per hour. A true and correct copy of the most recent Laffey
28 Matrix as published on its website is attached hereto as **Exhibit 1**.

6. The Parties' Settlement Agreement provides for a Class Counsel Fees Payment not to exceed one-third (1/3) of the Gross Settlement Amount, currently estimated at \$490,000.00, and a Class Counsel Litigation Expenses Payment not to exceed \$33,000.00 in actual, reasonable costs.

7. The Settlement Agreement further provides for an agreed allocation of the Class Counsel Fees Payment among Class Counsel. Pursuant to that allocation, Lavi & Ebrahimian, LLP and Sullivan & Yaeckel Law Group are each allocated 42.5% of the Class Counsel Fees Payment, and Labor Law PC is allocated 15%, subject to Court approval of the overall Class Counsel Fees Payment.

8. Labor Law PC maintained contemporaneous time records reflecting the work performed in this matter. The work performed included factual investigation, review of employment records and policies, legal research, drafting pleadings, participating in mediation and settlement negotiations, reviewing settlement documents, coordinating with co-counsel, and assisting with settlement approval proceedings.

9. Labor Law PC has expended approximately 107 hours in connection with this matter, resulting in a lodestar of approximately \$109,03.00. This figure does not include additional time that will continue to be incurred in connection with settlement administration, responding to class member inquiries, final approval proceedings, and other post-settlement matters. The lodestar amount of \$109,03.00 is less than Labor Law PC's share of the total attorneys' fees award of \$73,500.

10. The chart below summarizes the approximate hours expended by Labor Law PC in this matter:

	Yadidsion
Meetings and Correspondence with Client	15
Meetings and Correspondence with Counsel and Co-counsel	10
Investigation and Informal Discovery	25
Pleadings	5
Mediation Preparation and Attendance	25
Settlement and Approval	15
Court Appearances and Preparation	2
Legal Research	10
Total	107
Rate	\$1,019.00
TOTAL FEES	\$109,03.00

11. The work performed by Labor Law PC was undertaken on a contingency basis, with no guarantee of recovery. This matter involved substantial litigation risk, including the possibility that no recovery would be obtained had the case proceeded through class certification, merits of litigation, or trial.

12. By dedicating significant attorney time and resources to this matter, Labor Law PC necessarily forewent other fee-generating work. The negotiated fee structure reflects the contingent nature of this litigation and the risks undertaken by Class Counsel in prosecuting this Action.

13. The results obtained in this case reflect substantial benefits achieved for the Settlement Class through arm's-length settlement negotiations. The fee structure set forth in the Settlement Agreement, including the agreed allocation among Class Counsel, is reasonable in light of the work performed, the risks undertaken, and the results achieved.

COSTS OF LITIGATION

14. To date, Labor Law PC has incurred \$6,219.13 in litigation costs and expenses in connection with this action. These costs were reasonably and necessarily incurred in the prosecution of this matter and are supported by the underlying invoices and receipts, which are attached hereto as Exhibits 1-3. This amount includes certain filing and administrative costs associated with related proceedings in ECU003580. ECU003580 was subsequently stayed in light of the filing of the instant action, and Plaintiff in that matter was later joined into this case. Accordingly, any costs incurred in ECU003580 were necessarily related to and subsumed within the prosecution of this action, and no duplicate recovery of costs is sought.

15. Accordingly, Class Counsel seeks reimbursement of \$6,219.13 in litigation costs and expenses, subject to Court approval, to be paid from the Gross Settlement Amount. These costs were reasonable and necessary for the successful prosecution of this case, and are within the \$33,000.00 cap set forth in the Settlement Agreement.

16. A true and correct copy of Labor Law PC's Gig Kyriacou payment receipt reflecting payment of \$4,350.00 for the November 13, 2024 mediation in this action is attached hereto as **Exhibit 2**.

17. True and correct copies of Labor Law PC's invoices/receipts for court filing, e-filing platform, and service-related fees incurred in connection with this action (including One Legal and Letter Stream charges and any court transaction fees) are attached hereto as **Exhibit 3**.

18. A true and correct copy of Labor Law PC's invoice/receipt for the LWDA/PAGA notice filing fee in connection with this action is attached hereto as **Exhibit 4**.

LABOR LAW PC LITIGATION COSTS SUMMARY

Details of charge	Exhibit	Amount
Gig Kyriacou – mediation fees (payment receipt)	2	\$4,350.00
Court filing/e-filing/service-related fees (One Legal + court transaction fee + Letter stream)	3	\$1,794.13
LWDA – PAGA notice filing fee	4	\$75.00
TOTAL (including estimated Final Approval filing fees)		\$6,219.13

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 29th day of May, 2026, at Santa Monica, California.

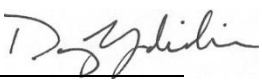
By: 
Danny Yadidsion
Attorney for Plaintiff Jose Gomez and
similarly situated employees

EXHIBIT - 1

LAFFEY MATRIX

[History](#)
[Case Law](#)
[See the Matrix](#)
[Contact us](#)
[Home](#)

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/25- 5/31/26	1.075336	\$277	\$508	\$625	\$902	\$1,019	\$1,227
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1,141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1,057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406

6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $i_{\frac{1}{2}}$ Years Out of Law School $i_{\frac{1}{2}}$ is calculated from June 1 of each year, when most law students graduate. $i_{\frac{1}{2}}$ 1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $i_{\frac{1}{2}}$ 4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $i_{\frac{1}{2}}$ 1-3" from June 1, 1996 until May 31, 1999, would move into tier $i_{\frac{1}{2}}$ 4-7" on June 1, 1999, and tier $i_{\frac{1}{2}}$ 8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT - 2

Transaction details

PLAT BUS CHECKING (...3196)

-\$4,350.00

Outgoing wire transfer



Jun 25, 2025

Posted date

POSTED

Status

PLAT BUS CHECKING (...3196)

Account name

0625MMQFMP2L003343

SWIFT/FED/CHIP ID

3058815176ES

Transaction ID

Beneficiary information

Account8565

Name MEDIATION OFFICES OF GIG KYRIACOU

Address 246 NORTH PASS AVENUE BURBANK CA 91505 US

Bank information

Related references BMG OF 25/06/25

Additional information

Additional information MANAGEMENT & TRAINING CORPORATION

For transaction details, please refer to the periodic statement for the official record of this transaction. For outgoing payments you may also access up to 13 months of wire transfer history from the Wire activity/Global activity page.

EXHIBIT - 3



1400 North McDowell Blvd. Suite 300
Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Bill To
Labor Law PC 101 California Ave., #106 Santa Monica CA 90403

Credit Card Sale

Date	6/21/2024
Customer	0160670
Credit Sale	06138334
Amount Due	\$0.00

One Legal Order Number	23171431
Contact	Dax Inting
Attorney Name	Danny Yadidsion
Billing Code	ECU003580
Case Title	Jose Gomez vs. Management & Training Corporation
Case Number	ECU003580
Court	Superior Court of California, Imperial County
Court Transaction Number	24IM00044557
Documents	Complaint ,Civil Case Cover Sheet ,Summons: Filed

STATUTORY DISBURSEMENTS*	AMOUNT
Court Filing Fee	\$1,435.00
Court Technology Access Fee	\$1.95
SUBTOTAL	\$1,436.95

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$14.95
Convenience Fee‡	\$42.83
SUBTOTAL	\$57.78

FEES SUMMARY	AMOUNT
Disbursements	\$1,436.95
One Legal Fees	\$57.78
TOTAL CHARGED	\$1,494.73

Past due balance may be charged a late payment fee and/or a late charge of up to 1.5% per month (18% per annum).
* These mandatory fees are charged by the court or required by statute and are not One Legal service fees. One Legal disburses these fees on your behalf.
‡ When paying invoices by credit card, a convenience fee will be assessed in accordance with applicable law and Terms of Service accepted at time of order. To avoid these fees, you can choose to pay via ACH.



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Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Bill To
Labor Law PC 101 California Ave., #106 Santa Monica CA 90403

Credit Card Sale

Date	6/26/2024
Customer	0160670
Credit Sale	06152336
Amount Due	\$0.00

One Legal Order Number	23171432
Contact	Dax Inting
Billing Code	ECU003580
Case Title	Jose Gomez vs. Management & Training Corporation
Case Number	ECU003580
Court	Superior Court of California, Imperial County
Court Transaction Number	11283307
Documents	Complaint ,Civil Case Cover Sheet ,Summons: Filed ,,

ONE LEGAL FEES	AMOUNT
Service on a Registered Agent (CT or CSC)	\$40.00
Convenience Fee‡	\$1.18
SUBTOTAL	\$41.18

FEES SUMMARY	AMOUNT
One Legal Fees	\$41.18
TOTAL CHARGED	\$41.18

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Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Bill To
Labor Law PC 101 California Ave., #106 Santa Monica CA 90403

Credit Card Sale

Date	6/26/2024
Customer	0160670
Credit Sale	06154838
Amount Due	\$0.00

One Legal Order Number	23213327
Contact	Dax Inting
Attorney Name	Danny Yadidsion
Billing Code	ECU003580
Case Title	Jose Gomez vs. Management & Training Corporation
Case Number	ECU003580
Court	Superior Court of California, Imperial County
Court Transaction Number	24IM00044933
Documents	Proof of Service of Summons

STATUTORY DISBURSEMENTS*	AMOUNT
Court Technology Access Fee	\$1.95
SUBTOTAL	\$1.95

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$14.95
Convenience Fee‡	\$0.50
SUBTOTAL	\$15.45

FEES SUMMARY	AMOUNT
Disbursements	\$1.95
One Legal Fees	\$15.45
TOTAL CHARGED	\$17.40

Past due balance may be charged a late payment fee and/or a late charge of up to 1.5% per month (18% per annum).
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8551 East Anderson | Suite 108 | Scottsdale, AZ 85255
(480) 473-3282 support@letterstream.com

INVOICE

Date	Invoice #
Estimated Invoice	9806833

Labor Law PC
100 Wilshire Blvd
Suite 700
Santa Monica, CA 90401

Remit to address:

LetterStream, Inc.
PO Box 29900
Department 937
Phoenix AZ 85038-0900

		Terms	Due Date	Rep
		PrePay	Upon Approval	DP
Item	Description	Qty	Cost	Total
_Pre-Addressed PDF (1stclass)	PDF document printed on white 8.5" by 11" paper mailed by USPS first-class postage.	1	0.910	\$ 0.91
5 Sheets Inserted	8.5x11 20 lb Plain White Simplex Black print 20240618JoseGomez-LWDAPAGALetter.pdf	1	0.600	\$ 0.60
Coversheet	8.5x11 Printed Coversheet	1	0.100	\$ 0.10
Extra Postage	1 additional ounce per piece	1	0.240	\$ 0.24
MAILING DATE: deletes done - waiting for printing				
JOB TITLE: Jose Gomez - CT Corp				
JOB TYPE: _Pre-Addressed PDF (1stclass)				
Total Charges			\$ 1.85	
Total Due			\$ 1.85	

Thank you for your business.

A 2% monthly charge will be levied on any past due balances. Customer agrees to pay all collection costs and attorney's costs and attorney's fees necessary to collect any past due amounts, as permitted by law. Failure to contact us promptly about discrepancies substantiates the charges.



8551 East Anderson | Suite 108 | Scottsdale, AZ 85255
(480) 473-3282 support@letterstream.com

INVOICE

Date	Invoice #
Estimated Invoice	9806995

Labor Law PC
100 Wilshire Blvd
Suite 700
Santa Monica, CA 90401

Remit to address:

LetterStream, Inc.
PO Box 29900
Department 937
Phoenix AZ 85038-0900

		Terms	Due Date	Rep
		PrePay	Upon Approval	DP
Item	Description	Qty	Cost	Total
_Pre-Addressed PDF (1stclass)	PDF document printed on white 8.5" by 11" paper mailed by USPS first-class postage.	1	0.910	\$ 0.91
5 Sheets Inserted	8.5x11 20 lb Plain White Simplex Black print 20240618JoseGomez-LWDAPAGALetter.pdf	1	0.600	\$ 0.60
Coversheet	8.5x11 Printed Coversheet	1	0.100	\$ 0.10
Extra Postage	1 additional ounce per piece	1	0.240	\$ 0.24
MAILING DATE: deletes done - waiting for printing				
JOB TITLE: Jose Gomez - MGT				
JOB TYPE: _Pre-Addressed PDF (1stclass)				
Total Charges			\$ 1.85	
Total Due			\$ 1.85	

Thank you for your business.

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Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Bill To
Labor Law PC 101 California Ave., #106 Santa Monica CA 90403

Credit Card Sale

Date	12/11/2024
Customer	0160670
Credit Sale	06627641
Amount Due	\$0.00

One Legal Order Number	24309345
Contact	Danny Yadidsion
Attorney Name	Danny Yadidsion
Billing Code	ECU003580
Case Title	Jose Gomez vs. Management & Training Corporation
Case Number	ECU003580
Court	Superior Court of California, Imperial County
Court Transaction Number	24IM00056418
Documents	Notice of Remote Appearance

STATUTORY DISBURSEMENTS*	AMOUNT
Court Technology Access Fee	\$3.50
SUBTOTAL	\$3.50

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$14.95
Convenience Fee‡	\$0.60
SUBTOTAL	\$15.55

FEES SUMMARY	AMOUNT
Disbursements	\$3.50
One Legal Fees	\$15.55
TOTAL CHARGED	\$19.05

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Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Bill To
Labor Law PC 101 California Ave., #106 Santa Monica CA 90403

Credit Card Sale

Date	12/3/2024
Customer	0160670
Credit Sale	06602075
Amount Due	\$0.00

One Legal Order Number	24251295
Contact	Dax Inting
Attorney Name	Danny Yadidsion
Billing Code	ECU003580
Case Title	Jose Gomez vs. Management & Training Corporation
Case Number	ECU003580
Court	Superior Court of California, Imperial County
Court Transaction Number	24IM00055755
Documents	Case Management Conference Statement

STATUTORY DISBURSEMENTS*	AMOUNT
Court Technology Access Fee	\$3.50
SUBTOTAL	\$3.50

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$14.95
Convenience Fee‡	\$0.60
SUBTOTAL	\$15.55

FEES SUMMARY	AMOUNT
Disbursements	\$3.50
One Legal Fees	\$15.55
TOTAL CHARGED	\$19.05

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1-800-938-8815 ext. 1
TIN: 85-4343705

Bill To
Labor Law PC 101 California Ave., #106 Santa Monica CA 90403

Credit Card Sale

Date	10/16/2024
Customer	0160670
Credit Sale	06468039
Amount Due	\$0.00

One Legal Order Number	23946169
Contact	Dax Inting
Attorney Name	Danny Yadidsion
Billing Code	ECU003580
Case Title	Jose Gomez vs. Management & Training Corporation
Case Number	ECU003580
Court	Superior Court of California, Imperial County
Court Transaction Number	24IM00052473
Documents	Complaint: Amended-First

STATUTORY DISBURSEMENTS*	AMOUNT
Court Technology Access Fee	\$3.50
SUBTOTAL	\$3.50

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$14.95
Convenience Fee‡	\$0.60
SUBTOTAL	\$15.55

FEES SUMMARY	AMOUNT
Disbursements	\$3.50
One Legal Fees	\$15.55
TOTAL CHARGED	\$19.05

Past due balance may be charged a late payment fee and/or a late charge of up to 1.5% per month (18% per annum).

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1400 N. McDowell Blvd
Suite 300
Petaluma CA 94954
TIN : 85-4343705

Bill To
Labor Law PC 101 California Ave., #106 Santa Monica CA 90403

Credit Card Sale

Date	9/29/2025
Customer	0160670
Credit Sale	07573779
Amount Due	\$0
Tax Total	\$0.00

Order Number	26408881
Contact	Filing Labor Law PC
Attorney	Danny Yadidsion
Billing Code	ECU003580
Case Title	Jose Gomez vs. Management & Training Corporation
Court	Superior Court of California, Imperial County
Court Transaction Number	25IM00079740
Case Number	ECU003580
Documents	Stipulation and Order

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$16.95
Convenience Fee‡	\$0.55
SUBTOTAL	\$17.50

FEES SUMMARY	AMOUNT
One Legal Fees	\$17.50
Sales Tax	\$0.00
TOTAL CHARGED	\$17.50

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Suite 300
Petaluma CA 94954
TIN : 85-4343705

Bill To
Labor Law PC 101 California Ave., #106 Santa Monica CA 90403

Credit Card Sale

Date	9/29/2025
Customer	0160670
Credit Sale	07574337
Amount Due	\$0
Tax Total	\$0.00

Order Number	26411847
Contact	Filing Labor Law PC
Attorney	Danny Yadidsion
Billing Code	ECU003580
Case Title	Jose Gomez vs. Management & Training Corporation
Court	Superior Court of California, Imperial County
Court Transaction Number	25IM00079769
Case Number	ECU003580
Documents	Stipulation and Order

ONE LEGAL FEES	AMOUNT
Court Filing Fee	\$20.00
Court Technology Access Fee	\$3.50
eFiling Charge	\$16.95
Disbursement Administration Charge	\$1.00
Convenience Fee‡	\$1.35
SUBTOTAL	\$42.80

FEES SUMMARY	AMOUNT
One Legal Fees	\$42.80
Sales Tax	\$0.00
TOTAL CHARGED	\$42.80

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1400 N. McDowell Blvd
Suite 300
Petaluma CA 94954
TIN : 85-4343705

Bill To
Labor Law PC 101 California Ave., #106 Santa Monica CA 90403

Credit Card Sale

Date	10/1/2025
Customer	0160670
Credit Sale	07583441
Amount Due	\$0
Tax Total	\$0.00

Order Number	26432030
Contact	Alor Dela Cruz
Attorney	Danny Yadidsion
Billing Code	ECU003580
Case Title	Jose Gomez vs. Management & Training Corporation
Court	Superior Court of California, Imperial County
Court Transaction Number	25IM00079990
Case Number	ECU003580
Documents	Proof of Personal Service

ONE LEGAL FEES	AMOUNT
Court Technology Access Fee	\$3.50
eFiling Charge	\$16.95
Convenience Fee‡	\$0.66
SUBTOTAL	\$21.11

FEES SUMMARY	AMOUNT
One Legal Fees	\$21.11
Sales Tax	\$0.00
TOTAL CHARGED	\$21.11

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8551 East Anderson | Suite 108 | Scottsdale, AZ 85255
(480) 473-3282 support@letterstream.com

INVOICE

Date	Invoice #
12/04/2025	12975002

Labor Law PC
100 Wilshire Blvd
Suite 700
Santa Monica, CA 90401

Remit to address:

LetterStream Inc.
P.O. Box 60692
City of Industry, CA 91716-0692

Job Name		Mail Date	Terms	Payment Due	
Gomez - Amended PAGA MTC		In Production	PrePay	Upon Approval	
Item	Description	Qty	Cost	Total	
_Pre-Addressed PDF (Certified)	PDF document printed on white 8.5" by 11" paper mailed by USPS Certified first-class postage	1	11.060	\$ 11.06	
12 Sheets Inserted	8.5x11 20 lb Plain White Simplex Black print AMENDED PAGA-LWDANOTICE.pdf	1	1.440	\$ 1.44	
Coversheet	8.5x11 Printed Coversheet	1	0.100	\$ 0.10	
Extra Postage	2 additional ounces per piece	1	0.580	\$ 0.58	

Thank you for your business.

A 2% monthly charge will be levied on any past due balances. Customer agrees to pay all collection costs and attorney's costs and attorney's fees necessary to collect any past due amounts, as permitted by law. Failure to contact us promptly about discrepancies substantiates the charges.

Total Charges	\$ 13.18
Total Due	\$ 13.18



8551 East Anderson | Suite 108 | Scottsdale, AZ 85255
(480) 473-3282 support@letterstream.com

INVOICE

Date	Invoice #
12/04/2025	12974989

Labor Law PC
100 Wilshire Blvd
Suite 700
Santa Monica, CA 90401

Remit to address:

LetterStream Inc.
P.O. Box 60692
City of Industry, CA 91716-0692

Job Name		Mail Date	Terms	Payment Due	
Gomez-Amended PAGA CT Corp		In Production	PrePay	Upon Approval	
Item	Description	Qty	Cost	Total	
_Pre-Addressed PDF (Certified)	PDF document printed on white 8.5" by 11" paper mailed by USPS Certified first-class postage	1	11.060	\$ 11.06	
12 Sheets Inserted	8.5x11 20 lb Plain White Simplex Black print AMENDED PAGA-LWDANOTICE.pdf	1	1.440	\$ 1.44	
Coversheet	8.5x11 Printed Coversheet	1	0.100	\$ 0.10	
Extra Postage	2 additional ounces per piece	1	0.580	\$ 0.58	

Thank you for your business.

A 2% monthly charge will be levied on any past due balances. Customer agrees to pay all collection costs and attorney's costs and attorney's fees necessary to collect any past due amounts, as permitted by law. Failure to contact us promptly about discrepancies substantiates the charges.

Total Charges	\$ 13.18
Total Due	\$ 13.18



5341 Old Redwood Highway Suite 310
Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Bill To
Labor Law PC 101 California Ave., #106 Santa Monica CA 90403

Credit Card Sale

Date	2/5/2026
Customer	0160670
Credit Sale	08012320
Amount Due	\$0.00

One Legal Order Number	27393350
Contact	Filing Labor Law PC
Attorney Name	Danny Yadidsion
Billing Code	ECU003320
Case Title	Julia Torres vs. Management & Training Corporation
Case Number	ECU003320
Court	Superior Court of California, Imperial County
Court Transaction Number	26IM00090532
Documents	Notice of Remote Appearance

STATUTORY DISBURSEMENTS*	AMOUNT
Court Technology Access Fee	\$3.50
SUBTOTAL	\$3.50

ONE LEGAL FEES	AMOUNT
eFiling Charge	\$17.95
Convenience Fee‡	\$0.75
SUBTOTAL	\$18.70

FEES SUMMARY	AMOUNT
Disbursements	\$3.50
One Legal Fees	\$18.70
Sales Tax	\$0.00
TOTAL CHARGED	\$22.20

Past due balance may be charged a late payment fee and/or a late charge of up to 1.5% per month (18% per annum).

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Superior Court of Imperial County
El Centro
939 W. Main St
El Centro, CA 92243

Receipt No: 792674E.1
Payor: Danny Yadidsion
Date: 02/05/2026
Time: 10:19 AM

ECU003320

Julia Torres vs. Management & Training
Corporation

Remote Appearance Fee	25.00
Remote Appearance Late Fee	25.00

Total:	50.00
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Credit Card *1454	50.00
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jquiroz	Total Paid:	50.00
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Change:	0.00
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Balance after payment:	0.00
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EXHIBIT - 4

Subject: Thank you for submission of your PAGA Case.

6/18/2024

LWDA Case No. LWDA-CM-1034638-24

Law Firm : Labor Law PC

Plaintiff Name : Jose Gomez

Employer: Management & Training Corporation

Filing Fee : \$75.00

IFP Claimed : No

Item submitted: Initial PAGA Notice

Thank you for your submission to the Labor and Workforce Development Agency. Please make a note of the LWDA Case No. above as you may need this number for future reference when filing any subsequent documents for this Case.

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency