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ZAKAY LAW GROUP, APLC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JESSICA HERRIGAN, an individual, on
behalf of herself and on behalf of all persons
similarly situated,

Plaintiffs,

v.

CHILDREN'S SPECIALISTS OF SAN
DIEGO, A MEDICAL GROUP, INC., a
California Corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 37-2021-00014044-CU-OE-CTL

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

Date: December 2, 2022
Time: 9:00 a.m.

Judge: Hon. Joel Wohlfeil
Dept.: 73

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

2 1. I am the managing partner of Zakay Law Group, APLC, and co-counsel of record
3 for Plaintiff JESSICA HERRIGAN, on behalf of herself, and on behalf of all persons similarly
4 situated, and in her representative capacity on behalf of the State of California and fellow Aggrieved
5 Employees, ("Plaintiff") in this matter. As such, I am fully familiar with the facts, pleadings, and
6 history of the matter.

7 2. This Declaration is being submitted in support of Plaintiff's Motion for Final
8 Approval of Class Action and PAGA Settlement and Plaintiff's Motion for Class Counsel Award
9 and Class Representative Service Award.

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

20 **I. EXPERIENCE**

21 4. Over the course of the litigation during the last two years, a number of attorneys have
22 worked on this matter. Their credentials are reflected in the Zakay Law Group, APLC firm resume,
23 a true and correct copy of which is attached hereto as Exhibit #A. Some of the major cases my firm
24 has undertaken are also set forth in Exhibit #A. The attorneys involved in this matter have had class
25 litigation experience, much of it in employment class actions, unfair business practices and other
26 complex litigation. I have experience in cases involving labor code violations and meal and rest
27 break claims. Counsel have litigated similar labor law cases against other employers on behalf of
28 employees. Counsel have been approved as experienced Counsel throughout California. It is this

1 level of experience which enabled the firms to undertake the instant matter and to successfully
2 combat the resources of the defendant and their capable and experienced counsel. Because of the
3 concerted and dedicated effort this case required to properly handle and prosecute, Counsel were
4 precluded from taking other cases, and in fact, had to turn away other potential fee generating cases.

5 **II. LODESTAR AND REQUESTED COUNSEL FEES PAYMENT**

6 5. As of November 4, 2022, Zakay Law Group, APLC incurred lodestar totaling
7 \$63,060.00 in this matter. I have reviewed my firm's lodestar in this matter and believe the charges
8 are reasonable and were reasonably necessary to the conduct of the case. From August 2020 through
9 November 2022, my firm has worked more than 134 hours prosecuting these claims with the
10 attorneys' hourly fee rates for attorneys at \$375-\$550, resulting in the current lodestar. A detailed
11 breakdown of the total fees and the services performed by the firm on this case is attached hereto as
12 Exhibit #B.

13 6. Further, Class Counsel will be performing additional work, including finalizing the
14 motion for final approval, attending the hearing on final approval, finalizing the orders and
15 judgment, and monitoring completion of the settlement process over the course of several years. I
16 expect this additional work will result in an additional 20-30 hour of additional work and an
17 additional lodestar between \$11,000 and \$16,500.

18 7. The rates charged by my firm are in line with the prevailing rates of attorneys in the
19 local legal community for similar work and, if this were a commercial matter, these are the charges
20 that would be made and presented to the client. These hourly rates have been approved by Court's
21 throughout California, including the Courts in the Superior Court of California. Finally, the
22 reasonableness of Counsel's hourly rates is further confirmed by comparing such rates with the rates
23 of comparable counsel practicing complex and class litigation as detailed in the National Law
24 Journal Billing Survey. See e.g. *Zest IP Holdings, LLC v. Implant Direct MFG, LLC*, 2014 U.S.
25 Dist. LEXIS 167563 (S.D. Cal. 2014) (finding that "Mayer Brown's \$775 average billing rate for
26 partners" and "Mayer Brown's \$543 average associate billing rate" are reasonable rates when
27 compared within 21 other firms practicing in the Southern District of California). This survey is
28 useful to show that Counsel's rates are in line with the comparable rates of the defense counsel that

1 opposes these types of class claims, such as Mayer Brown. In another example, Sheppard Mullin
2 Richter & Hampton, who is opposing counsel in many cases prosecuted by Counsel charges rates
3 as high as \$875 for partners and \$535 for associates. Similarly, Paul Hastings, another opposing
4 counsel in these types of cases, charges between \$900 and \$750 for partners and \$755 and \$335 for
5 associates. Thus, the rates charged by Counsel for comparable work are less than these examples
6 and are therefore undoubtedly reasonable.

7 **III. COSTS**

8 8. As part of the Settlement Agreement, the parties agreed that Counsel may seek
9 reimbursement of expenses incurred as documented in Counsel's billing records as part of the
10 Counsel Award. Attached hereto as Exhibit #C is a true and correct copy of the Zakay Law Group,
11 Cost Summary detailing the actually incurred litigation expenses by the Zakay Law Group APLC,
12 for this matter as of November 4, 2022. As shown in detail in the attached Cost Summary, the Zakay
13 Law Group incurred a total of \$3,206.51 in litigation costs prosecuting this action – with additional
14 costs anticipated.

15 9. These litigation expenses include the expenses incurred for mediation fees, expert
16 costs, and filing fees, all of which are costs normally billed to and paid by the client. The costs were
17 reasonably incurred by Counsel in the prosecution of this matter and are set forth in detail in the
18 contemporaneous billing records attached hereto.

19 I declare under the penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct. Executed this 4th day of November 2022, at San Diego, California.

21
22 **ZAKAY LAW GROUP, APLC**

23 By: _____

24 Shani O. Zakay
25 Attorney for Plaintiff
26
27
28

EXHIBIT A

Zakay Law Group, APC
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 892-7095
Fax: (858) 404-9203

1. Firm Practice Areas:

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, Civil Litigation, Business 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 Southern & Central Districts of California

• **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, *magma 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, Civil 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 Julicann Alvarado Biography:**

- **PRACTICE AREAS**

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

EXHIBIT B

Activities Export

11/02/2022

4:29 PM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/02/2022	 	Review, revise and approve admin declaration. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.70h	\$550.00	-	\$385.00
11/02/2022	 	Review billing records and invoices and compile and update. Emails and work with co-counsel to finalize MFF. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.50h	\$550.00	-	\$825.00
10/30/2022	 	Work on the MFF ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	5.00h	\$550.00	-	\$2,750.00
10/28/2022	 	Work on the MFA ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	5.00h	\$550.00	-	\$2,750.00
10/28/2022	 	Emails regarding MFA and MFF ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
10/17/2022	 	Review weekly reports from admin regarding status of administration, number of opt outs, objections, etc. and discuss with co-counsel. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	2.00h	\$550.00	-	\$1,100.00
					134.00h		\$0.00 0.00h	\$63,060.00 134.00h

Activities Export

11/02/2022

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/31/2022		Review calculations from admin and discuss with co-counsel. Email admin to approve.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
08/27/2022		Review notice documents from ILYM and approve.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
08/18/2022		Review timeline from admin. Approve and calendar all relevant dates and instruct staff accordingly.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.80h	\$550.00	-	\$440.00
07/22/2022		Review the tentative and the settlement agreement. Prepare for and attend MPA hearing.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.10h	\$550.00	-	\$605.00
07/21/2022		Review tentative ruling and discuss with co-counsel in preparation for hearing tomorrow.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.80h	\$550.00	-	\$440.00
06/08/2022		Draft decs., revise P&A, and finalize Notice and Proposed Order for MPA  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	5.00h	\$375.00	-	\$1,875.00
					134.00h		\$0.00 0.00h	\$63,060.00 134.00h

Activities Export

11/02/2022

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Date ▾	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/31/2022	 	Work on the MPA Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	5.00h	\$550.00	-	\$2,750.00
05/11/2022	 	Emails with staff and counsel regarding MPA review. Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.20h	\$550.00	-	\$110.00
04/20/2022	 	Draft MPA Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	2.50h	\$375.00	-	\$937.50
04/11/2022	 	Emails with Attorney Zakay and PBLC E.Zakay re drafting of MPA Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
03/04/2022	 	More work on the settlement documents. Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.80h	\$550.00	-	\$440.00
01/31/2022	 	work on the settlement agreement and exhibits. Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	6.00h	\$550.00	-	\$3,300.00
01/19/2022		Call with client regarding MOU.	34801-Horrigan	Shani	1.00h	\$550.00	-	\$550.00
					134.00h		\$0.00	\$63,060.00
							0.00h	134.00h

Activities Export

11/02/2022

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Finalize the MOU for signatures. ● Unbilled	Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Zakay				
01/18/2022	🕒	Prepare for and attend mediation; post-mediation conversation with client; and negotiate terms of MOU ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	12.00h	\$375.00	-	\$4,500.00
01/18/2022	🕒	Prepare for and attend mediation. Post-mediation meeting with co- counsel and conversation with client. Draft and negotiate MOU. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	12.00h	\$550.00	-	\$6,600.00
01/12/2022	🕒	Review and further revise mediation brief ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
01/11/2022	🕒	Work on the mediation brief. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	5.00h	\$550.00	-	\$2,750.00
01/11/2022	🕒	Review expert report and emails with Attorney Hom regarding necessary work accordingly. Follow up conversation with co- counsel. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.40h	\$550.00	-	\$770.00
					134.00h		\$0.00 0.00h	\$63,060.00 134.00h

Activities Export

11/02/2022

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/11/2022		Review Def's mediation doc production and revise mediation brief accordingly ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	2.80h	\$375.00	-	\$1,050.00
01/07/2022		Review data production and discuss with co-counsel. Call with the expert to go over claims for mediation. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	3.40h	\$550.00	-	\$1,870.00
12/28/2021		Emails regarding data and review by expert for mediation. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.30h	\$550.00	-	\$165.00
12/27/2021		Emails with staff regarding payment for mediation. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.10h	\$550.00	-	\$55.00
12/22/2021		Emails with OPC regarding data for mediation. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.10h	\$550.00	-	\$55.00
12/15/2021		Emails regarding sampling for mediation. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.40h	\$550.00	-	\$220.00
					134.00h		\$0.00 0.00h	\$63,060.00 134.00h

Activities Export

11/02/2022

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/02/2021	 Unbilled	Emails with OPC regarding data for mediation.	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.40h	\$550.00	-	\$220.00
12/02/2021	 Unbilled	Follow up on mediation data demand.	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.20h	\$550.00	-	\$110.00
10/11/2021	 Unbilled	Emails with staff re mediation paperwork	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.20h	\$375.00	-	\$75.00
10/11/2021	 Unbilled	Drafting, finalizing, filing COA.	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.50h	\$165.00	-	\$82.50
08/30/2021	 Unbilled	Review and approve CMS for CMC.	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.50h	\$550.00	-	\$275.00
08/30/2021	 Unbilled	Emails with OPC re mediation scheduling	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.10h	\$375.00	-	\$37.50
08/20/2021		Drafting SI for Attorneys,	34801-Horrigan	Shani	1.00h	\$165.00	-	\$165.00
					134.00h		\$0.00	\$63,060.00
							0.00h	134.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		circulating for approval, and preparing to send to OC. ● Unbilled	Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Zakay				
08/11/2021	🕒	Review and finalize PLA's discovery responses and doc production ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	2.00h	\$375.00	-	\$750.00
08/09/2021	🕒	Further revise PLA's discovery responses ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	1.00h	\$375.00	-	\$375.00
08/09/2021	🕒	Review and revise responses to discovery. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	4.50h	\$550.00	-	\$2,475.00
08/08/2021	🕒	More work on PLA's discovery responses ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	4.50h	\$375.00	-	\$1,687.50
08/06/2021	🕒	Draft PLA's discovery responses - Form Rogs (General) ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	3.50h	\$375.00	-	\$1,312.50
08/05/2021	🕒	Follow-up confirmatory email to OPC re M/C call on MTC extension	34801-Horrigan Jessica Horrigan v.	Jackland Hom	0.10h	\$375.00	-	\$37.50
					134.00h		\$0.00 0.00h	\$63,060.00 134.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		and possible mediation ● Unbilled	Children's Specialists of San Diego, A Medical Group, Inc.					
08/05/2021	🕒	Call and emails with Attorney Zakay and co-counsel re call with OPC on MTC extension and possible mediation ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.20h	\$375.00	-	\$75.00
08/05/2021	🕒	Call with OPC re MTC extension and possible mediation ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
08/05/2021	🕒	Call with Attorney Hom regarding her call with OPC and possible mediation. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.30h	\$550.00	-	\$165.00
08/05/2021	🕒	Emails with Attorney Hom regarding extension on the MTC. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.30h	\$550.00	-	\$165.00
08/05/2021	🕒	Review emails with OPC. Email OPC re MTC deadline. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
08/04/2021	🕒	Emails with client re discovery ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of	Jackland Hom	0.20h	\$375.00	-	\$75.00
					134.00h		\$0.00	\$63,060.00
							0.00h	134.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			San Diego, A Medical Group, Inc.					
08/03/2021	 	Draft PLA's discovery responses Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	4.00h	\$375.00	-	\$1,500.00
07/29/2021	 	Meeting with staff to discuss necessary work required for PLA's discovery responses Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.40h	\$375.00	-	\$150.00
07/21/2021	 	Follow-up email with client re discovery responses and documents Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.20h	\$375.00	-	\$75.00
07/21/2021	 	Call with client re discovery responses Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	1.80h	\$375.00	-	\$675.00
07/21/2021	 	Review DEF discovery requests in preparation for call with client Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.80h	\$375.00	-	\$300.00
06/30/2021	 	Finalize meet and confer letter to Def. re discovery Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical	Jackland Hom	0.30h	\$375.00	-	\$112.50
					134.00h		\$0.00 0.00h	\$63,060.00 134.00h

Activities Export

11/02/2022

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Group, Inc.								
06/29/2021		Review Def's responses to discovery. Review and revise meet and confer letter re same.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	1.50h	\$375.00	-	\$562.50
06/22/2021		Review Defendant's responses to interrogatories.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
06/11/2021		Review Defendant's Answer and upload to CLIO. Legal research regarding various affirmative defenses.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	2.50h	\$550.00	-	\$1,375.00
05/20/2021		Draft of the SI, circulating to attorneys, emailing, and mailing out.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.00h	\$150.00	-	\$150.00
05/19/2021		Review and revise the discovery. Draft additional discovery, including RFPs and RFAs for potential service.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	3.00h	\$550.00	-	\$1,650.00
05/02/2021		Emails with OPC regarding extension to respond to the complaint.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical	Shani Zakay	0.20h	\$550.00	-	\$110.00
					134.00h		\$0.00 0.00h	\$63,060.00 134.00h

Activities Export

11/02/2022

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Group, Inc.								
04/01/2021		Review filed complaint and related documents. Calendar relevant dates and upload to CLIO.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.40h	\$550.00	-	\$220.00
03/30/2021		Work on the complaint.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.00h	\$550.00	-	\$550.00
03/24/2021		Review summons and civil cover sheet and revise. Emails with staff regarding the same.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.20h	\$550.00	-	\$110.00
03/23/2021		Drafting Summons and Civil Case Cover Sheet - T.D.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.40h	\$150.00	-	\$60.00
02/10/2021		Review letter from defendant and upload to CLIO. Email to co-counsel accordingly.  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	0.70h	\$550.00	-	\$385.00
01/21/2021		File PAGA notice  Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
					134.00h		\$0.00 0.00h	\$63,060.00 134.00h

Activities Export

11/02/2022

4:29 PM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/21/2021	 	Revise complaint to remove additional rep Lewis. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.50h	\$375.00	-	\$187.50
01/20/2021	 	Draft PAGA notice. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	1.00h	\$375.00	-	\$375.00
01/16/2021	 	Review the file. Review and approve the complaint. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	4.50h	\$550.00	-	\$2,475.00
01/14/2021	 	Review file. Draft complaint. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	6.50h	\$375.00	-	\$2,437.50
01/13/2021	 	Call with potential client Monique Burchette to discuss claims in preparation for drafting complaint. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	0.30h	\$375.00	-	\$112.50
01/13/2021	 	Call with PNC Ceara Lewis to discuss claims in preparation for drafting complaint. ● Unbilled	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Jackland Hom	1.00h	\$375.00	-	\$375.00
01/09/2021		Meeting with referral partner to	34801-Horrigan	Shani	2.00h	\$550.00	-	\$1,100.00
					134.00h		\$0.00 0.00h	\$63,060.00 134.00h

Activities Export

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Date		Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			discuss potential case, client, and claims, and issues with the case. Draft intro letter to client.	Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Zakay				
			● Unbilled						
						134.00h		\$0.00 0.00h	\$63,060.00 134.00h

EXHIBIT C

Activities Export

11/02/2022

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/28/2022	\$ ● Unbilled	Expert Cost	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.00	\$768.75	-	\$768.75
12/02/2021	\$ ● Unbilled	Mediation fee	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.00	\$2,325.00	-	\$2,325.00
10/11/2021	\$ ● Unbilled	OneLegal - COA	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.00	\$12.35	-	\$12.35
08/31/2021	\$ ● Unbilled	OneLegal Fee - CMS	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.00	\$12.35	-	\$12.35
05/20/2021	\$ ● Unbilled	Postage Fee for SI to OC	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.00	\$0.71	-	\$0.71
04/15/2021	\$ ● Unbilled	filing fee – POS	34801-Horrigan Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Shani Zakay	1.00	\$12.35	-	\$12.35
01/21/2021	\$	PAGA Filing Fee	34801-Horrigan	Shani	1.00	\$75.00	-	\$75.00
							\$0.00 0.00h	\$3,206.51 0.00h

Activities Export

11/02/2022
4:29 PM

Date		Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		●	Unbilled	Jessica Horrigan v. Children's Specialists of San Diego, A Medical Group, Inc.	Zakay				
								\$0.00	\$3,206.51
								0.00h	0.00h