

1 Mark A. Ozzello (SBN 116595)
Mark.Ozzello@capstonelawyers.com
2 Brandon Brouillette (SBN 273156)
Brandon.Brouillette@capstonelawyers.com
3 Joseph Hakakian (SBN 323011)
Joseph.Hakakian@capstonelawyers.com
4 Capstone Law APC
1875 Century Park East, Suite 1000
5 Los Angeles, California 90067
Telephone: (310) 556-4811
6 Facsimile: (310) 943-0396

7 Attorneys for Plaintiffs Camreen Taylor and Billy Jefferson

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN BERNARDINO**
10

11 TONY DOYLE and BILLY JEFFERSON, as
PAGA Settlement Members pursuant to the
12 Private Attorneys General Act ("PAGA"), on
behalf of the State of California and other PAGA
13 Settlement Members,

14 Plaintiffs,

15 v.

16 CBOCS WEST, INC., a Nevada corporation;
CRACKER BARREL OLD COUNTRY
17 STORE, INC., a Tennessee corporation; and
DOES 1 through 10, inclusive,
18

19 Defendants.

20 CAMREEN TAYLOR, individually, and on
behalf of other PAGA Settlement Members
21 pursuant to the California Private Attorneys
General Act,
22

23 Plaintiff,

24 vs.

25 CRACKER BARREL OLD COUNTRY
STORE, INC., an unknown business entity;
CBOCS WEST, INC., an unknown business
26 entity; and DOES 1 through 100, inclusive,
27

28 Defendants.

Doyle Action
Case No. CIVDS2013220
Filed On: May 29, 2019

Taylor Action
Case No. CIVDS2009214
Filed On: June 1, 2020

Honorable David S. Cohn
Department S26

**DECLARATION OF RAUL PEREZ IN
SUPPORT OF MOTION FOR APPROVAL
OF PRIVATE ATTORNEYS GENERAL ACT
(CAL. LABOR CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND AWARD
OF ATTORNEYS' FEES AND COSTS,
SERVICE AWARDS, AND SETTLEMENT
ADMINISTRATION COSTS**

Date: June 11, 2021
Time: 10:00 a.m.
Place: Department S26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3
4
5
6
7
8
9

10
11
12
13

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Aggrieved Employees; (6) violation of Labor Code sections 1174(d), 1198, and the applicable IWC
2 wage order for Defendants' alleged failure to maintain payroll records; (7) violation of Labor Code
3 section 204 for Defendants' alleged failure to pay all earned wages during employment; (8) violation of
4 Labor Code sections 201, 202, and 203 for Defendants' alleged failure to pay all earned wages upon
5 termination; (9) violation of Labor Code section 206.5 for requiring Plaintiffs and other non-party
6 Aggrieved Employees to execute a release of claims as a condition to receiving wages due to them; (10)
7 violation of Labor Code sections 212 and 213 for issuing instruments for the payment of wages that were
8 not payable in cash on demand, without discount, and with prior authorization; (11) violation of Labor
9 Code sections 221 and 224 for unlawfully deducting a portion of wages previously paid to Plaintiffs and
10 other non-party Aggrieved Employees; (12) violation of Labor Code section 223 for secretly paying
11 Plaintiffs and other non-party Aggrieved Employees lower wages than required by statute, while
12 purporting to pay the proper wages; (13) violation of Labor Code section 1198 for failing to provide
13 suitable seating to Plaintiffs and other non-party Aggrieved Employees; (14) violation of Labor Code
14 section 2802 for Defendants' alleged failure to reimburse Plaintiffs and other non-party Aggrieved
15 Employees for all business expenses necessarily incurred; and (15) violation of Labor Code section
16 2810.5(a)(1)(A)-(C) for Defendants' alleged failure to provide written notice of information material to
17 Plaintiff Doyle's and other non-party Aggrieved Employees' employment with Defendants.

18 4. Based on information and belief, Plaintiff Camreen Taylor filed the action entitled
19 *Camreen Taylor v. Cracker Barrel Old County Store, Inc.*, et al. against Defendant in the Superior Court
20 of California for the County of San Bernardino, Case No. CIVDS2009214 ("*Taylor Action*"), alleging
21 Defendant violated the California Labor Code and therefore owes civil penalties under PAGA on behalf
22 of aggrieved hourly-paid or non-exempt employees who worked for Defendant in the State of California.

23 5. On November 20, 2020, the Parties participated in a full-day mediation conducted by
24 Hon. Steven M. Vartabedian (Ret.), a well-respected mediator experienced in mediating complex labor
25 and employment matters. By way of mediation, the Parties were able to reach the settlement.

26 6. I can opine that the PAGA settlement, for the consideration and on the terms set forth in
27 the settlement agreement, is fair, reasonable, an adequate, and is in the best interests of the LWDA and
28 all covered employees in light of all known facts and circumstances, including the risk of significant

delay and uncertainty associated with litigation, and various defenses asserted by Defendants.

ATTORNEYS' FEES AND COSTS

7. Capstone works exclusively on a contingency fee basis, and has not received any compensation for litigating and settling this matter.

8. I have reviewed a summary of the billing records for this action, which are maintained during the regular course of business and billed contemporaneously. The bill for attorneys' fees is summarized in the charts below:

Attorney	Title	CA Bar Yr.	Rate	Hours	Fees
Raul Perez	Partner	1994	\$775	16	\$12,400.00
Mark Ozzello	Senior Counsel	1984	\$775	27.2	\$21,080.00
Mao Shiokura	Senior Counsel	2009	\$485	21	\$10,185.00
Anthony Castillo	Senior Counsel	2009	\$485	18.1	\$8,778.50
Brandon Brouillette	Associate	2010	\$485	54.5	\$26,432.50
Brooke Waldrop	Fmr. Associate	2017	\$295	11.8	\$3,481.00
Michelle Kennedy	Associate	2018	\$265	27.1	\$7,181.50
Total				175.7	\$89,538.50

Major Task	Hours	Fees
Pleadings and Stipulations	51.3	\$23,468.50
Legal and Factual Analysis of Claims and Defenses & Discovery	30.8	\$11,027.00
Case Management	27.5	\$15,308.50
Mediation & Settlement Negotiations	46.7	\$27,251.50
Drafting Settlement Agreement & Approval Papers	19.4	\$12,483.00
Total	175.7	\$89,538.50

Major Task / Attorney	Hours	Fees
Pleadings and Stipulations	51.3	\$23,468.50
Mark Ozzello (\$775)	5.6	\$4,340.00
Mao Shiokura (\$485)	11.9	\$5,771.50
Anthony Castillo (\$485)	13.1	\$6,353.50
Brandon Brouillette (\$485)	6.9	\$3,346.50
Michelle Kennedy (\$265)	13.8	\$3,657.00
Legal and Factual Analysis of Claims & Defenses	30.8	\$11,027.00
Mark Ozzello (\$775)	0.3	\$232.50
Mao Shiokura (\$485)	8.9	\$4,316.50
Anthony Castillo (\$485)	2.5	\$1,212.50
Brooke Waldrop (\$295)	6.8	\$2,006.00
Michelle Kennedy (\$265)	12.3	\$3,259.50

Major Task / Attorney	Hours	Fees
Case Management	27.5	\$15,308.50
Mark Ozzello (\$775)	10.7	\$8,292.50
Mao Shiokura (\$485)	0.2	\$97.00
Anthony Castillo (\$485)	2.5	\$1,212.50
Brandon Brouillette (\$485)	8.3	\$4,025.50
Brooke Waldrop (\$295)	4.8	\$1,416.00
Michelle Kennedy (\$265)	1	\$265.00
Mediation & Settlement Negotiations	46.7	\$27,251.50
Raul Perez (\$775)	14.1	\$10,927.50
Mark Ozzello (\$775)	1.9	\$1,472.50
Brandon Brouillette (\$485)	30.5	\$14,792.50
Brooke Waldrop (\$295)	0.2	\$59.00
Drafting Settlement Agreement & Approval Papers	19.4	\$12,483.00
Raul Perez (\$775)	1.9	\$1,472.50
Mark Ozzello (\$775)	8.7	\$6,742.50
Brandon Brouillette (\$485)	8.8	\$4,268.00
Total	175.7	\$89,538.50

9. While adjusting our rates to track market increases, Capstone's rates have steadily remained reasonable and competitive, and have been consistently approved by many federal and state courts over the past several years. *See, e.g., Sandoval v. Abacus Data Systems, Inc.*, No. 37-2018-00039466-CU-OE-CTL (San Diego County Superior Court Feb. 26, 2021) (approving Capstone's rates for Associates (\$295 to \$445) and Senior Counsel/Partners (\$485 to \$775)); *Martinez v. Stumps Market, Inc.*, No. 37-2018-00035669-CU-OE-CTL (San Diego County Superior Court Dec. 18, 2020) (approving Capstone's rates for Associates (\$295 to \$485) and Senior Counsel/Partners (\$485 to \$775)); *Pride v. Pride Industries*, No. STK-UOE-2017-7110 (San Joaquin County Superior Court Dec. 14, 2020) (approving Capstone's rates for Associates (\$295 to \$485) and Senior Counsel/Partners (\$545 to \$775)); *MV Transportation Wage and Hour Cases*, No. JCCP No. 4993 (San Joaquin County Superior Court Oct. 20, 2020) (approving Capstone's rates for Associates (\$485 to \$505) and Senior Counsel/Partners (\$545 to \$775)); *Hayes v. Rent-A-Center West, Inc.*, No. 37-2018-00043861 (San Diego County Superior Court Aug. 28, 2020) (approving Capstone's rates for Associates (\$265 to \$485) and Senior Counsel/Partners (\$545 to \$775)); *Vega v. JPMorgan Chase Bank, N.A.*, No. BC698750 (Los Angeles County Superior Court Aug. 20, 2020) (approving Capstone's rates for Associates (\$265 to \$505) and Senior Counsel/Partners (\$545 to \$775)); *Wertz v. Dawn Food Products, Inc.*, No. CIV

1 DS1811446 (San Bernardino County Superior Court June 29, 2020) (approving Capstone's rates for
2 Associates (\$295 to \$505) and Senior Counsel/Partners (\$545 to \$775)); *Reyes v. Verifi, Inc.*, No.
3 BC707889 (Los Angeles County Superior Court March 16, 2020) (approving Capstone's rates for
4 Associates (\$345 to \$485) and Senior Counsel/Partners (\$545 to \$775)); *Vargas v. Ford Motor Co.*, No.
5 CV12-08388 AB (FFMx) (C.D. Cal. March 5, 2020) (approving Capstone's rates for Associates (\$245
6 to \$445) and Senior Counsel/Partners (\$495 to \$775)); *Wylie v. Hyundai Motor America*, No. 8:16-cv-
7 02102-DOC-JCG (C.D. Cal. March 2, 2020) (approving Capstone's rates for Associates (\$295 to \$445)
8 and Senior Counsel/Partners (\$545 to \$775)); *Campbell v. AEG Management Oakland, LLC*, No.
9 RG17859830 (Alameda County Superior Court Feb. 7, 2020) (approving Capstone's rates for
10 Associates (\$345 to \$485) and Senior Counsel/Partners (\$545 to \$775)); *Scoggins v. Crossmark, Inc.*,
11 No. 56-2017-00492936-CU-OE-VTA (Ventura County Superior Court) (approving Capstone's rates for
12 Associates (\$435) and Senior Counsel/Partners (\$495 to \$725)); *Brown v. Harris v. Mr. C Manager*
13 *LLC*, No. CIV DS1721484 (San Bernardino County Superior Court Aug. 21, 2019) (approving
14 Capstone's rates for Associates (\$295 to \$434) and Senior Counsel/Partners (\$495 to \$725)); *Black v. T-*
15 *Mobile USA, Inc.*, No. 4:17-cv-04151-HSG (N.D. Cal. July 24, 2019) (approving Capstone's rates for
16 Associates (\$295 to \$435) and Senior Counsel/Partners (\$495 to \$725)); *Rodas v. Petroleum Sales, Inc.*,
17 No. CIV1703590 (Marin County Superior Court July 19, 2019) (approving Capstone's rates for
18 Associates (\$395 to \$435) and Senior Counsel/Partners (\$495 to \$725)); *Aguilar v. Marriott Int'l, Inc.*,
19 No. BC513197 (Los Angeles County Superior Court Apr. 9, 2019) (approving Capstone's rates for
20 Associates (\$295 to \$435) and Senior Counsel/Partners (\$495 to \$725)); *Garrido v. J. C. Penney*
21 *Corporation, Inc.*, No. 5:18-cv-02051-JVS-SP (C.D. Cal. Jan. 25, 2019) (approving Capstone's rates for
22 Associates (\$435 to \$455) and Senior Counsel/Partners (\$495 to \$725)); *Boseman v. VXi Global*
23 *Solutions, LLC*, No. BC602442 (Los Angeles County Superior Court Jan. 3, 2019) (approving
24 Capstone's rates for Associates (\$295 to \$435) and Senior Counsel/Partners (\$495 to \$725)); *Mansilla v.*
25 *XPO Logistics Worldwide, Inc.*, No. RG17865271 (Alameda County Superior Court Nov. 16, 2018)
26 (approving Capstone's rates for Associates (\$295 to \$435) and Senior Counsel/Partners (\$495 to \$725));
27 *Carbajal v. Tom's Famous Family Restaurants*, No. CIVDS1601821 (San Bernardino County Superior
28 Court July 31, 2018) (approving Capstone's rates for Associates (\$295 to \$395) and Senior

1 Counsel/Partners (\$495 to \$725)); *Williams v. Marshalls of CA, LLC*, No. BC503806 (Los Angeles
2 County Superior Court Feb. 15, 2018) (approving Capstone's rates for Associates and Senior
3 Counsel/Partners (\$570 to \$725)); *Grove v. Halston Operating Co.*, No. 37-2016-00029271-CU-OE-
4 CTL (San Diego County Superior Court Feb. 9, 2018) (approving Capstone's rates for Associates and
5 Senior Counsel/Partners (\$470 to \$725)); *Lopez v. Kmart Corp.*, No. CIVMSC15-00134 (Contra Costa
6 County Superior Court Nov. 29, 2017) (approving Capstone's rates for Associates (\$395 to \$470) and
7 Senior Counsel/Partners (\$595 to \$725)); *Chambless v. Islands Restaurants, L.P.*, No. BC458426 (Los
8 Angeles County Superior Court Aug. 22, 2017) (approving Capstone's rates for Associates (\$245 to
9 \$470) and Senior Counsel/Partners (\$595 to \$725)); *Linares v. Ann Inc.*, No. BC605635 (Los Angeles
10 County Superior Court Aug. 22, 2017) (approving Capstone's rates for Associates (\$245 to \$470) and
11 Senior Counsel/Partners (\$570 to \$725)); *Grillo v. Key Energy Services, LLC*, No. 2:14-cv-00881-AB-
12 AGR (C.D. Cal. Oct. 13, 2017) (approving Capstone's rates for Associates (\$245 to \$470) and Senior
13 Counsel/Partners (\$595 to \$725)); *Carter v. GMRI, Inc.*, No. RIC1506085 (Riverside County Superior
14 Court Jan. 10, 2017) (approving Capstone's rates for Associates (\$345 to \$470) and Senior
15 Counsel/Partners (\$570 to \$695)); *Rodriguez v. Swissport North America, Inc.*, No. BC441173 (Los
16 Angeles County Superior Court April 17, 2017) (approving Capstone's rates for Associates (\$370 to
17 \$470) and Senior Counsel/Partners (\$520 to \$695)); *Emmons v. Quest Diagnostics Clinical
18 Laboratories, Inc.*, No. 1:13-cv-00474-DAD-BAM (E.D. Cal. Feb. 27, 2017) (approving Capstone's
19 rates for Associates (\$370 to \$495) and Senior Counsel/Partners (\$545 to \$695)); *Rickerd v. OneWest
20 Resources LLC*, No. BC562538 (Los Angeles County Superior Court Jan. 19, 2017) (approving
21 Capstone's rates for Associates (\$245 to \$470) and Senior Counsel/Partners (\$595 to \$695)); *Nunnally v.
22 Dave & Busters, Inc.*, No. 8:16-cv-00855-DOC-KES (C.D. Cal. Jan. 9, 2017) (approving Capstone's
23 rates for Associates (\$395 to \$495) and Senior Counsel/Partners (\$545 to \$695)); *Ford v. CEC
24 Entertainment, Inc.*, No. 3:14-cv-01420-RS (N.D. Cal. Nov. 18, 2016) (approving Capstone's rates for
25 Associates (\$420 to \$470) and Senior Counsel/Partners (\$545 to \$695)); *Lutin v. Lerner New York, Inc.*,
26 No. BC498443 (L.A. County Super. Ct. Sept. 20, 2016) (approving Capstone's rates for Associates
27 (\$370-470) and Senior Counsel/Partners); *The Children's Place Retail Stores Wage & Hour Cases*, No.
28 JCCP4790 (L.A. County Super. Ct. Sept. 1, 2016) (approving Capstone's rates for Associates (\$245 to

1 \$470) and Senior Counsel/Partners (\$520 to \$695)); *Coffey v. Beverages & More, Inc.*, No. BC477269
2 (L.A. County Super. Ct. July 26, 2016) (L.A. County Super. Ct. Sept. 1, 2016) (approving Capstone's
3 rates for Associates (\$370 to \$470) and Senior Counsel/Partners (\$545 to \$695)); *Guitar Center Stores*
4 *Wage and Hour Cases*, No. JCCP 4818 (San Francisco Superior Court June 7, 2016) (approving
5 Capstone's rates for Associates (\$370 to \$470) and Senior Counsel/Partners (\$545 to \$695)); *Berry v.*
6 *Urban Outfitters Wholesale, Inc.*, No. Case 4:13-cv-02628-JSW (N.D. Cal. April 7, 2016) (approving
7 Capstone's rates for Associates (\$370 to \$470) and Senior Counsel/Partners (\$545 to \$695)

8 10. Capstone's rates are comparable to those judicially approved for other plaintiff's firms,
9 such as Baron & Budd (rates ranging from \$775 for the requested partner to \$390-\$630 for non-
10 partners), Wasserman Comden Casselman & Essensten (rates ranging from \$670-750 for partners and
11 \$300-500 for associates), and Blood Hurst & Reardon (\$510-695 for partners). *See Aarons v. BMW of*
12 *North America*, No. 11-7667-PSG, 2014 U.S. Dist. LEXIS 118442, *40-41 (C.D. Cal. Apr. 29, 2014)
13 (also approving rates of Strategic and Capstone). Other courts have approved hourly rates in this range
14 for plaintiff's side law firms in the Southern California area. *See, e.g., Kearney v. Hyundai Motor Am.*,
15 2013 U.S. Dist. LEXIS 91636, *24 (C.D. Cal. June 28, 2013) (approving hourly rates of \$650-\$800 for
16 senior attorneys in consumer class action); *Parkinson v. Hyundai Motor America*, 796 F. Supp. 2d 1160,
17 1172 (C.D. Cal. 2010) (approving hourly rates between \$445 and \$675); *Faigman v. AT&T Mobility*
18 *LLC*, 2011 U.S. Dist. LEXIS 15825, * 2 (N.D. Cal. Feb. 15, 2011) (approving hourly rates of \$650 an
19 hour for partner services and \$500 an hour for associate attorney services); *Richard v. Ameri-Force*
20 *Mgmt. Servs., Inc.*, No. 37-2008-00096019 (San Diego Super. Ct., Aug. 27, 2010) (\$695 to \$750 an hour
21 for partners; \$495 an hour for associates); *Barrera v. Gamestop Corp.*, No. CV 09-1399 (C.D. Cal. Nov.
22 29, 2010) (\$700 an hour for partners; \$475 an hour for associates); *Anderson v. Nextel Retail Stores,*
23 *LLC*, No. CV 07-4480 (C.D. Cal. June 20, 2010) (\$655 to \$750 an hour for partners; \$300 to \$515 an
24 hour for associates); *Luquetta v. Regents of Cal.*, CGC-05-443007 (San Francisco Super. Ct.) (approving
25 2012 partner rates between \$550 and \$850 per hour); and *Holloway v. Best Buy Co.*, C-05-5056-PJH
26 (MEJ) (N.D. Cal.) (approving 2011 partner rates of \$825 to \$700 an hour, associate rates between \$355
27 and \$405 per hour).

28 11. As summarized in the table below, counsel has incurred a total of \$4,428.68 in costs and

expenses to date.

Date	Cost Item	Amount
9/19/2019	FedEx-CBOCS West, Inc. Attn: Human Resources, 307 Hartmann Drive, Lebanon, TN 37087 – request for Billy Jefferson Wage Records and Personnel File	\$30.39
9/19/2019	FedEx-Documents sent to client	\$43.99
9/19/2019	Postage/Mailing	\$1.21
9/19/2019	Postage/Mailing	\$1.42
9/30/2019	Westlaw	\$29.53
10/16/2019	Postage/Mailing	\$2.84
10/22/2019	Postage/Mailing	\$1.21
1/28/2020	LWDA - Tony Doyle v. Cracker Barrel Old Country Store, Inc.	\$75.00
1/28/2020	LWDA - Billy Jefferson v. Cracker Barrel Old Country Store	\$75.00
5/6/2020	PACER	\$0.20
5/6/2020	PACER	\$0.30
5/18/2020	ProLegal Courier - Summons & Complaint Filed	\$1,210.20
5/31/2020	Westlaw	\$23.58
7/10/2020	San Bernardino Superior Court	\$6.50
7/27/2020	ProLegal Courier - Payment of Complaint Fee	\$534.95
8/19/2020	ProLegal Courier - Service of Summons & Complaint at CT Corp in Tennessee Service of Summons & Complaint at CT Corp LA	\$415.60
9/28/2020	Executive Conferencing	\$0.41
9/28/2020	Executive Conferencing	\$0.76
9/28/2020	Executive Conferencing	\$1.79
9/30/2020	Westlaw	\$4.66
10/5/2020	CourtCall for Mark Ozzello	\$94.00
10/5/2020	ProLegal Courier - Notice of Posting Jury Fee and Case management Statement Filed.	\$397.90
10/19/2020	ProLegal Courier	-\$45.00
10/31/2020	ProLegal Courier - Jury Fee Returned (\$150.00)	-\$150.00
11/16/2020	Fountain Consulting, Inc.	\$1,240.00
11/25/2020	Executive Conferencing	\$3.93
12/23/2020	ProLegal Courier - Case Management Statement Filed	\$114.95
1/5/2021	CourtCall for Brandon Brouillette	\$94.00
1/11/2021	PACER	\$0.10
1/11/2021	PACER	\$3.40
1/21/2021	Executive Conferencing	\$0.41
3/24/2021	CourtCall for Mark Ozzello	\$94.00
4/15/2021	ProLegal Courier - Notice of Settlement & Stipulation to Consolidate Filed	\$121.45
Total		\$4,428.68

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

2
3
4

5
6
7

8
9
0
1
2
3

4
5
6
7
8
9
0
1

2

34

5
67
8

Exhibit 1

FIRM PROFILE

Capstone Law APC is one of California's largest plaintiff-only labor and consumer law firms. With over twenty-five seasoned attorneys, many formerly with prominent class action or defense firms, Capstone has the experience, resources, and expertise to successfully prosecute complex employment and consumer actions.

Since its founding in 2012, Capstone has emerged as a major force in aggregate litigation, making law on cutting-edge issues and obtaining over a hundred million dollars in recovery for employees and consumers:

- In February, 2015, Capstone attorneys Raul Perez and Ryan H. Wu were honored with the *California Lawyer* Attorney of the Year (CLAY) award in labor and employment for their work in the landmark case *Iskanian v. CLS Transportation Los Angeles*, 59 Cal.4th 348 (2014), which preserved the right of California workers to bring representative actions under the Labor Code Private Attorneys General Act ("PAGA") notwithstanding a representative action waiver in an arbitration agreement.
- Recognized as a leading firm in the prosecution of PAGA enforcement actions, Capstone is responsible for some of the most important decisions in this area. In *Williams v. Superior Court (Marshall's of Calif.)*, 3 Cal.5th 531 (2017), Capstone attorneys achieved a watershed decision before the California Supreme Court as to the broad scope of discovery in PAGA actions. In *Baumann v. Chase Inv. Servs. Corp.*, 747 F.3d 1117 (9th Cir. 2014), a case of first impression, Capstone successfully argued that PAGA actions are state enforcement actions not covered by the Class Action Fairness Act.
- Capstone has made important contributions to consumer protection law. In *McGill v. Citibank N.A.*, 2 Cal. 5th 945 (2017), Capstone represented plaintiffs in a major decision holding that the right to seek public injunctive relief under the state's consumer protection laws cannot be waived and that consumers need not satisfy class certification requirements to enjoin unfair business practices on behalf of the public. In *Nguyen v. Nissan N.A.*, 726 F.3d 811 (9th Cir. 2019), Capstone attorneys reversed a denial of class certification, making law that clarified the use of "benefit of the bargain" damages models in consumer class actions.
- Capstone served as class counsel in a number of significant wage and hour settlements, including \$12 million on behalf of a nationwide class of in *Hightower v. JPMorgan Chase Bank*, Case No. 11-01802 (C.D. Cal.), over \$10 million on behalf of non-exempt hourly workers in *Zamora v. Balboa Life & Casualty LLC*, Case No. BC360026 (L.A. Super. Ct.); and \$9 million on behalf of pharmacists in *Dittmar v. Costco Wholesale Corp.*, No. 14-1156 (S.D. Cal.). In *Vorise v. 24 Hour Fitness USA, Inc.*, No. C 15-02051 (Contra Costa Super. Ct.), Capstone and co-counsel negotiated an \$11 million PAGA settlement on behalf of over 36,000 employees for Labor Code violations.
- Capstone has an established practice in automotive defect class actions and is currently appointed sole class counsel, following contested class certification, in *Victorino v. FCA US, LLC*, No. 16-1617-GPC, 2019 WL 5268670 (S.D. Cal. Oct. 17, 2019) and *Salas v. Toyota Motor Sales, U.S.A., Inc.*, No. 15-8629-FMO, 2019 WL 1940619 (C.D. Cal. Mar. 27, 2019).

SUMMARY OF SIGNIFICANT SETTLEMENTS

Since its founding, Capstone has settled over 100 high-stakes class and representative actions totaling well over \$200 million dollars. Capstone's settlements have directly compensated hundreds of thousands of California workers and consumers. Capstone's actions have also forced employers to modify their policies for the benefit of employees, including changing the compensation structure for commissioned employees and changing practices to ensure that workers will be able to take timely rest and meal breaks. A leader in prosecuting PAGA enforcement actions, Capstone has secured millions of dollars in civil penalties for the State of California.

The following is a representative sample of Capstone's settlements:

- *Hightower et al v. Washington Mutual Bank*, No. 2:11-cv-01802-PSG-PLA (N.D. Cal.): gross settlement of \$12 million on behalf of approximately 150,000 personal bankers, tellers, sales associates, and assistant branch manager trainees for wage and hour violations;
- *Vargas v. Ford Motor Co.*, 12-08388-AB (C.D. Cal.): providing cash payments and unique buyback program for nearly 2 million consumers;
- *Moore v. PetSmart, Inc.*, No. 5:12-cv-03577-EJD (N.D. Cal.): gross settlement of \$10 million on behalf of over 19,000 non-exempt PetSmart employees for wage and hour violations;
- *Dittmar v. Costco Wholesale Corp.*, No. 14-1156 (S.D. Cal.): gross settlement of \$9 million on behalf of approximately 1,200 pharmacists for wage and hour violations;
- *Perrin v. Nabors Well Services Co.*, No. 56-2007-00288718 (Ventura Super. Ct.): gross settlement of over \$6.5 million on behalf of oil rig workers for sleep time and other wage violations;
- *Cook v. United Insurance Co.*, No. C 10-00425 (Contra Costa Super. Ct.): gross settlement of \$5.7 million on behalf of approximately 650 sales representatives;
- *Alvarez v. MAC Cosmetics, Inc.*, No. CIVDS1513177 (San Bernardino Super. Ct.): gross settlement of \$5.5 million for approximately 5,500 non-exempt employees.
- *Aceves v. AutoZone, Inc.*, No. 14-2032 (C.D. Cal.): gross settlement of \$5.4 million in a case alleging FCRA violations;
- *Berry v. Urban Outfitters Wholesale, Inc.*, No. 13-02628 (N.D. Cal.): gross settlement of \$5 million on behalf of over 12,000 nonexempt employees;
- *The Children's Place Retail Stores Wage & Hour Cases*, No. JCCP 4790: gross settlement of \$5 million on behalf of 15,000 nonexempt employees;
- *York v. Starbucks Corp.*, Case No. 08-07919 (C.D. Cal.): gross settlement of nearly \$5 million on behalf of over 100,000 non-exempt workers for meal break and wage statement claims;
- *Rodriguez v. Swissport USA*, No. BC 441173 (Los Angeles Super. Ct.): gross settlement of nearly \$5 million on behalf of 2,700 non-exempt employees following contested certification;
- *Asghari v. Volkswagen Group of North America*, Case No. 13-02529 (C.D. Cal.): Settlement providing complementary repairs of oil consumption defect, reimbursement for repairs, and extended warranty coverage of certain Audi vehicles valued at over \$20 million;
- *Klee v. Nissan of North America*, Case No. 12-08238 (C.D. Cal.): Settlement providing complimentary electric vehicle charging cards and extending warranty coverage for the electric battery on the Nissan Leaf valued at over \$10 million.

PROFESSIONAL BIOGRAPHIES

Partners

Rebecca Labat. Rebecca Labat is co-managing partner of Capstone Law APC, supervising the litigation for all of the firm's cases. She also manages the firm's co-counsel relationships and assists the firm's other partners and senior counsel with case management and litigation strategy. Under Ms. Labat's leadership, Capstone has successfully settled over 100 cases, delivering hundreds millions of dollars to California employees and consumers while earning statewide recognition for its cutting-edge work in developing new law.

Ms. Labat's career accomplishments representing consumers and employees in class actions include the certification of a class of approximately 3,200 current and former automobile technicians and shop employees for the miscalculation of the regular rate for purposes of paying premiums for missed meal and rest breaks.

Before her work representing plaintiffs in class and representative actions, Ms. Labat was an attorney with Wilson Elser and represented life, health, and disability insurers in litigation throughout California in both state and federal courts. She graduated from the University of California, Hastings College of the Law in 2002, where she was a member of the Hastings Civil Justice Clinic, served as a mediator in Small Claims Court for the City and County of San Francisco, and received the CALI Award for Excellence in Alternative Dispute Resolution. She received her undergraduate degree from the University of California, Los Angeles. Ms. Labat is a member of the National Employment Lawyers Association (NELA), the Consumer Attorneys Association of Los Angeles (CAALA), and the Beverly Hills Bar Association.

Raul Perez. Raul Perez is co-managing partner at Capstone, and has focused exclusively on wage and hour and consumer class litigation since 2011. Mr. Perez is the lead negotiator on numerous large settlements that have resulted in hundreds of millions to low-wage workers across California, including many of the most valuable settlements reached by Capstone.

During his career, Mr. Perez has successfully certified by way of contested motion and/or been appointed Lead Counsel or Interim Lead Counsel in several cases, including: *Lopes v. Kohl's Department Stores, Inc.*, Case No. RG08380189 (Alameda Super. Ct.); *Hightower v. JPMorgan Chase Bank*, Case No. 11-01802 (C.D. Cal.); *Tameifuna v. Sunrise Senior Living Managements, Inc.*, Case No. 13-02171 (C.D. Cal.) (certified class of over 10,000 hourly-paid employees); and *Berry v. Urban Outfitters Wholesale, Inc.*, Case No. 13-02628 (N.D. Cal.) (appointed lead counsel in a class action involving over 10,000 non-exempt employees). As the lead trial attorney in *Iskanian v. CLS Transportation Los Angeles*, 59 Cal. 4th 348 (2014), Mr. Perez, along with Mr. Wu, received the 2015 CLAY Award in labor and employment.

Mr. Perez received both his undergraduate degree and his law degree from Harvard University and was admitted to the California Bar in December 1994. Earlier in his career, Mr. Perez handled a variety of complex litigation matters, including wrongful termination and other employment related actions, for corporate clients while employed by some of the more established law firms in the State of California, including Morgan, Lewis & Bockius; Manatt Phelps & Phillips; and Akin Gump Strauss Hauer & Feld. Before Capstone, Mr. Perez was a partner at another large plaintiff's firm, helping to deliver millions of dollars in relief to California workers.

Melissa Grant. Melissa Grant is a partner at Capstone. Ms. Grant is responsible for litigating many of the firm's most contentious and high-stakes class actions. The author of numerous successful motions for class certification, Ms. Grant is the lead or co-lead attorney on multiplied certified class actions currently on track for trial, representing over 140,000 California employees in pursuing their wage and hour claims. She is also at the forefront in developing the law on PAGA, including administrative exhaustion, standing, the nature of PAGA violations, the scope of discovery, and trials.

Prior to joining Capstone, Ms. Grant worked at the Securities and Exchange Commission as a staff attorney in the Enforcement Division, investigating ongoing violations of federal securities regulations and statutes and for Quinn Emanuel Urquhart & Sullivan, LLP, where she was an associate on the trial team that prosecuted the *Mattel v. Bratz* case. Ms. Grant began her legal career as a law clerk to the Honorable Harry Pregerson, Justice of the Ninth Circuit Court of Appeals before joining Sidley & Austin as an associate. She graduated from Southwestern Law School in 1999, where she served as editor-in-chief of the Law Review, and graduated *summa cum laude* and first in her class. Ms. Grant earned her undergraduate degree from Cornell University, where she received the JFK Public Service Award and the Outstanding Senior Award. Her published articles include: *Battling for ERISA Benefits in the Ninth Circuit: Overcoming Abuse of Discretion Review*, 28 Sw. U. L. Rev. 93 (1998), and CLE Class Actions Conference (SF) CAFA: *Early Decisions on Commencement and Removal of Actions* (2006).

Ryan H. Wu. Ryan H. Wu is a partner at Capstone and is primarily responsible for complex motion work and supervising court approval of class action settlements. Mr. Wu handles many of the most challenging legal issues facing Capstone's clients, including the scope and operation of PAGA, contested attorneys' fees motions, responding to objectors, and high-impact appeals. Mr. Wu is responsible for the merits briefing in *McGill v. Citibank, N.A.*, 2 Cal. 5th 945 (2017), where the California Supreme Court unanimously held that consumers' right to pursue public injunctive relief cannot be impeded by a contractual waiver or class certification requirements. He briefed the closely-watched *Williams v. Superior Court (Marshall's of CA LLC)*, 3 Cal.5th 531 (2017), an important pro-employee ruling that broadened the scope of discovery in PAGA actions and resolved a longstanding conflict regarding third-party constitutional privacy rights. He also authored the briefs in *Baumann v. Chase Inv. Servs. Corp.*, 747 F.3d 1117 (9th Cir. 2014), where, on an issue of first impression, the Ninth Circuit sided with Plaintiffs in holding that PAGA actions are state enforcement actions not covered by the CAFA. In February 2015, Mr. Wu, along with Mr. Perez, received the prestigious CLAY award for his successful appellate work, including briefing to the California Supreme Court, in *Iskanian*. Mr. Wu recently achieved an important consumer victory in *Nguyen v. Nissan N.A.*, 932 F.3d 811 (9th Cir. 2019), which clarified the use of "benefit of the bargain" damages models in consumer class actions.

Mr. Wu graduated from the University of Michigan Law School in 2001, where he was an associate editor of the *Michigan Journal of Law Reform* and contributor to the law school newspaper. He received his undergraduate degree in political science with honors from the University of California, Berkeley. He began his career litigating international commercial disputes and commercial actions governed by the Uniform Commercial Code. Mr. Wu is co-author of "*Williams v. Superior Court: Employees' Perspective*" and "*Iskanian v. CLS Transportation: Employees' Perspective*," both published in the *California Labor & Employment Law Review*.

Robert Drexler. Robert Drexler is a partner with Capstone Law where he leads one of the firm's litigation teams prosecuting wage-and-hour class actions. He has more than 25 years of experience representing clients in wage-and-hour and consumer rights class actions and other complex litigation in state and federal courts. Over the course of his career, Mr. Drexler has successfully certified dozens of employee classes for claims

such as misclassification, meal and rest breaks, and off-the-clock work, ultimately resulting in multi-million dollar settlements. He has also arbitrated and tried wage-and-hour and complex insurance cases. Mr. Drexler has been selected as one of Southern California's "Super Lawyers" every year from 2009 through 2020.

Before joining Capstone, Mr. Drexler was head of the Class Action Work Group at Khorrami Boucher, LLP and led the class action team at The Quisenberry Law Firm. Mr. Drexler graduated from Case Western Reserve University School of Law, where he served as Managing Editor of the Case Western Reserve Law Review and authored *Defective Prosthetic Devices: Strict Tort Liability for the Hospital?* 32 CASE W. RES. L. REV. 929 (1982). He received his undergraduate degree in Finance at Ohio State University where he graduated *cum laude*. Mr. Drexler is a member of Consumer Attorneys of California (CAOC) and Consumer Attorneys of Los Angeles (CAALA). He has been a featured speaker at class action and employment litigation seminars, and has published articles in CAOC's Forum Magazine and The Daily Journal.

Jamie Greene. is a partner with Capstone Law, where she leads the firm's business development and case generation team. Ms. Greene is responsible for evaluating all potential new cases and referrals, developing new claims, and managing the firm's client and cocounseling relationships. She also supervises the pre-litigation phase for all cases, including investigation, analysis, and client consultation.

Before joining Capstone, Ms. Greene began her legal career at Makarem & Associates representing clients in a wide array of cases ranging from wrongful death, insurance bad faith, employment, personal injury, construction defect, consumer protection, and privacy law. Ms. Greene is a graduate of the University of Southern California Gould School of Law and earned her bachelor's degree from Scripps College in Claremont, California.

Senior Counsel

Theresa Carroll. Theresa Carroll is a senior counsel at Capstone Law. Her practice is devoted to the Appeals & Complex Motions team, working on various settlement and approval projects.

Prior to joining Capstone, Ms. Carroll was an associate with Parker Stanbury, LLP, advising small business owners on various employment matters and worked as an associate attorney for O'Donnell & Mandell litigating employment discrimination and sexual harassment cases. In 1995, she graduated from Southwestern University School of Law where she was on the trial advocacy team and was awarded the prestigious Trial Advocate of the Year award sponsored by the American Board of Trial Advocates (ABOTA) for Southwestern University School of Law. Ms. Carroll received her Bachelor of Science degree in speech with an emphasis in theatre from Iowa State University.

Liana Carter. Liana Carter is a senior counsel with Capstone Law APC, specializing in complex motions, writs, and appeals. Her work on recent appeals has included reversing a denial of class certification decision in *Brown v. Cinemark USA, Inc.*, No. 16-15377, 2017 WL 6047613 (9th Cir. Dec. 7, 2017), affirming a denial of a motion to compel arbitration in *Jacoby v. Islands Rests., L.P.*, 2014 Cal. App. Unpub. LEXIS 4366 (2014) and reversal of a dismissal of class claims in *Rivers v. Cedars-Sinai Med. Care Found.*, 2015 Cal. App. Unpub. LEXIS 287 (Jan. 13, 2015). Ms. Carter was responsible for drafting the successful petition for review in *McGill v. Citibank N.A.*, as well as the petition for review and briefing on the merits in *Williams v. Superior Court*, 2017 WL 2980258. Ms. Carter also has extensive prior experience in overseeing settlement negotiations and obtaining court approval of class action settlements.

Ms. Carter was admitted to the California bar in 1999 after graduating from the University of Southern California Gould School of Law, where she was an Articles Editor on the board of the *Southern California Law Review*. She received her undergraduate degree with honors from the University of California, Irvine.

Anthony Castillo. Anthony Castillo is a senior counsel with Capstone Law. His practice focuses on analyzing and developing pre-litigation wage-and-hour and consumer claims, including PAGA representative actions and class actions for failure to pay overtime and minimum wages, meal and rest period violations, and claims under the Fair Labor Standards Act and the Investigative Consumer Reporting Agency Act. Prior to joining Capstone, he was an associate at a California bankruptcy practice, where he represented individual and business debtors in liquidations and re-organizations as well as various debt and foreclosure defense-related issues.

Mr. Castillo graduated from Loyola Law School, Los Angeles in 2009, where he volunteered with the Disability Rights Legal Center. He attended Stanford University for his undergraduate degree, majoring in Political Science and minoring in History. Anthony is admitted to practice law in California and Washington and before the United States District Court for the Central and Southern Districts of California.

Molly DeSario. Molly DeSario is a senior counsel with Capstone Law, specializing in employment class action litigation. Ms. DeSario's practice focuses primarily on wage-and-hour class action and Private Attorneys General Act litigation on behalf of employees for failure to pay overtime and minimum wages, provide meal and rest breaks, and provide compensation for off-the-clock work. She has experience briefing and arguing a multitude of dispositive motions in state and federal court and has successfully certified and settled numerous classes for claims such as exempt misclassifications, unpaid wages, missed meal and rest breaks, and unreimbursed business expenses.

Ms. DeSario began her career as a general practice litigation associate with Sandler & Mercer in Rockville, Maryland, handling a wide range of civil and criminal matters. Since 2005, she has primarily litigated class action cases and, for the last seven years, has focused on representing employees and consumers in class and collective actions across California and the nation, helping them recover millions of dollars in unpaid wages, restitution, and penalties. Molly graduated from Northeastern University School of Law in 2002. During law school, she interned for the U.S. Attorney's Office in Boston, Massachusetts, and the Honorable Paul L. Friedman at the U.S. District Court for the District of Columbia. She received her undergraduate degree in Marketing and International Business from the University of Cincinnati, where she graduated summa cum laude.

Robert Friedl. Robert Friedl is a senior counsel at Capstone, where he devotes most of his time to the briefing and litigation strategy of consumer protection cases. Mr. Friedl has over 20 years of experience representing plaintiffs and defendants in consumer class actions, insurance coverage and defense, employment law, and personal injury. His lengthy service as an appellate attorney has yielded several published cases, including successful outcomes in *Goldstein v. Ralphs*, 122 Cal. App. 4th 229 (2004), *Morgan v. AT&T*, 177 Cal. App. 4th 1235 (2009), and *Hecimovich v. Encinal School Parent Teacher Organization*, 203 Cal. App. 4th 450 (2012). At Capstone, Mr. Friedl was responsible for the appellate win in *Grant v. Unifund CCR, LLC*, 577 Fed. Appx. 693 (9th Cir. 2014).

Prior to joining Capstone, Mr. Friedl was a partner at civil litigation boutique, where he handled the firm's most complex briefing. He is a graduate of the University of Connecticut, and received his law degree from Southwestern School of Law, where he earned an American Jurisprudence Book Award.

Helga Hakimi. Helga Hakimi is a senior counsel at Capstone Law. Her practice primarily involves employment law class action litigation, namely wage-and-hour class actions and PAGA litigation on behalf of employees for failure to pay overtime and minimum wages, provide meal and rest breaks, and provide compensation for off-the-clock work, and related employer violations under the Fair Labor Standards Act and California Labor Code.

Prior to joining Capstone, Ms. Hakimi was a partner at a civil litigation firm in West Los Angeles, where she handled mainly real estate litigation, business litigation, and defense of some employment law matters; prior to that, she worked as a civil litigation attorney handling complex personal injury litigation. Ms. Hakimi's interest in advocating for employee rights began in law school, where she volunteered for the Workers' Rights Clinic and assisted low-income community members in Northern California's greater Bay Area region with employment-related legal issues. Upon graduating from law school, Ms. Hakimi worked as an associate for a municipal law firm, and thereafter at the local City Attorney's Office, where she advised municipalities and cities in civil matters involving land use, environmental law, development issues, Constitutional law, and First Amendment rights. Ms. Hakimi graduated from Berkeley Law (Boalt Hall School of Law), where she earned her Juris Doctorate and was awarded the Prosser Award in Remedies. Ms. Hakimi received her Bachelor of Arts degree in Political Science with a minor in Education Studies from the University of California, Los Angeles, and graduated summa cum laude and with Departmental Highest Honors.

Daniel Jonathan. Daniel Jonathan is a senior counsel at Capstone Law. His practice primarily involves wage-and-hour class actions and PAGA litigation on behalf of employees for the failure to pay overtime and minimum wages, failure to provide meal and rest breaks, claims under the Fair Labor Standards Act, and other California Labor Code violations.

Prior to joining Capstone, Mr. Jonathan began his career as an associate at Kirkland & Ellis representing Fortune 500 clients in high-stakes litigation in various matters, including class action defense and plaintiff's actions for accounting fraud. Following that, he was a senior counsel at a boutique litigation firm where he successfully first-chaired several trials. Mr. Jonathan graduated from the Northwestern University School of Law. He received his undergraduate degree in Accounting from the University of Southern California, where he graduated cum laude. He has passed the CPA examination and worked as an auditor at Deloitte before attending law school.

Jonathan Lee. A senior counsel with Capstone, Jonathan Lee primarily litigates employment class actions. At Capstone, Mr. Lee has worked on several major successful class certification motions, and his work has contributed to multi-million dollar class settlements against various employers, including restaurant chains, retail stores, airport staffing companies, and hospitals. Prior to joining Capstone, Mr. Lee defended employers and insurance companies in workers' compensation actions throughout California.

Mr. Lee graduated in 2009 from Pepperdine University School of Law, where he served as an editor for the Journal of Business, Entrepreneurship and the Law; he received his undergraduate degree from UCLA.

Mark A. Ozzello. Mark A. Ozzello is a senior counsel with Capstone Law, where he leads the firm's consumer team. He is a nationally recognized and respected consumer and employment attorney who has litigated those issues throughout the country. He has always been at the forefront of consumer rights, sitting on the Board of Governors for the Consumer Attorneys of California and regularly appearing as a featured speaker on consumer rights issues nationwide.

Mr. Ozzello is a former partner of Arias Ozzello & Gignac and, most recently, was Of Counsel to Markun Zusman Freniere & Compton, LLP. In his capacity as a litigator, he has obtained results for his clients in excess of \$200 million dollars. Mark has also achieved consistent success in the California Courts of Appeal, and several judicial opinions regularly cite to his matters as authority for class certification issues. He has also argued appellate issues in several Circuit Courts of Appeals with great success. Mr. Ozzello attended Pepperdine University School of Law where he was an Editor to the Law Review, publishing several articles during his tenure in that capacity. He received his undergraduate degree from Georgetown University.

Mr. Ozzello has always strived to be an integral part of local communities. He has established educational scholarship programs at several charitable organizations, including El Centro De Amistad in Los Angeles and St. Bonaventure Indian Mission and School in Thoreau, New Mexico, and presides over a legal clinic in Los Angeles which provides pro bono legal assistance to non-English speaking individuals.

Bevin Allen Pike. Bevin Allen Pike is a senior counsel with Capstone Law where she focuses primarily on wage-and-hour class actions. Ms. Pike has spent her entire legal career representing employees and consumers in wage-and-hour and consumer rights class actions. Over the course of her career, Ms. Pike has successfully certified dozens of employee and consumer classes for claims such as meal and rest breaks, unpaid overtime, off-the-clock work, and false advertising.

Before joining Capstone, Ms. Pike's experience included class and representative action work on behalf of employees and consumers at some of the leading plaintiffs' firms in California. Ms. Pike graduated from Loyola Law School, Los Angeles, where she was an Editor for the International and Comparative Law Review. She received her undergraduate degree from the University of Southern California. Ms. Pike has been selected as one of Southern California's "Super Lawyers – Rising Stars" every year from 2012 through 2015.

Eduardo Santos. Eduardo Santos is a senior counsel at Capstone Law, and concentrates his practice on managing and obtaining court approval of many of Capstone's wage-and-hour, consumer, and PAGA settlements, from the initial contract drafting phase to motion practice, including contested motion practice on attorneys' fees. Over the course of his career, Mr. Santos has helped to secure court approval of over one hundred high-stakes class and representative action settlements totaling over \$100 million.

Before joining Capstone, Mr. Santos began his career at a prominent plaintiff's firm in Los Angeles specializing in mass torts litigation, with a focus on complex pharmaceutical cases. Most notably, he was involved in the national Vioxx settlement, which secured a total of \$4.85 billion for thousands of individuals with claims of injuries caused by taking Vioxx. Mr. Santos graduated from Loyola Law School, Los Angeles, where he was a recipient of a full-tuition scholarship awarded in recognition of academic excellence. While in law school, Mr. Santos served as an extern for the Honorable Thomas L. Willhite, Jr. of the California Court of Appeal. He graduated magna cum laude from UCLA and was a recipient of the Ralph J. Bunche Scholarship for academic achievement.

Mao Shiokura. Mao Shiokura is a senior counsel with Capstone. Her practice focuses on identifying, evaluating, and developing new claims, including PAGA representative actions and class actions for wage-and-hour violations and consumer actions under the Consumers Legal Remedies Act, False Advertising Law, Unfair Competition Law, and other consumer protection statutes. Prior to joining Capstone, Ms. Shiokura was an associate at a California lemon law firm, where she represented consumers in Song-Beverly, Magnuson-Moss, and fraud actions against automobile manufacturers and dealerships.

Ms. Shiokura graduated from Loyola Law School, Los Angeles in 2009, where she served as a staff member of Loyola of Los Angeles Law Review. She earned her undergraduate degree from the University of Southern California, where she was a Presidential Scholar and majored in Business Administration, with an emphasis in Cinema-Television and Finance.

John Stobart. John Stobart is a senior counsel with Capstone Law. He focuses on appellate issues in state and federal courts and contributes to the firm's amicus curiae efforts to protect and expand the legal rights of California employees and consumers. Mr. Stobart has significant appellate experience having drafted over two dozen writs, appeals and petitions, and having argued before the Second, Fourth, and Fifth Districts of the California Court of Appeal.

Prior to joining Capstone, Mr. Stobart was a law and motion attorney who defended against civil liability in catastrophic injury and wrongful death cases brought against his clients, which included the railroad, public schools, small businesses, and commercial and residential landowners. He has drafted and argued scores of dispositive motions at the trial court level and had success in upholding judgments and verdicts on appeal. He graduated cum laude from Thomas Jefferson School of Law where he was on the mock trial competition team and earned his undergraduate degree from the Ohio State University.

Orlando Villalba. Orlando Villalba is a senior counsel at Capstone Law. His practice primarily involves wage-and-hour class actions and PAGA litigation on behalf of employees for the failure to pay overtime and minimum wages, failure to provide meal and rest breaks, claims under the Fair Labor Standards Act, and other California Labor Code violations.

Mr. Villalba began his career at Kirkland & Ellis where he handled a wide range of business litigation matters, including transnational contract disputes, insurance-related tort claims, developer litigation, and civil rights actions. He also has extensive plaintiff-side experience representing government agencies and note-holders in the pursuit of mortgage and other fraud losses. Mr. Villalba graduated from Stanford Law School, where he served as an articles editor on the Stanford Journal of Law, Business & Finance. After law school, he clerked for the Honorable Warren Matthews of the Alaska Supreme Court. Orlando received his bachelor's degree in International Business from the University of Southern California.

Steven Weinmann. Steven Weinmann is a senior counsel with Capstone Law and leads the consumer rights team. His practice encompasses complex and class action litigation, including consumer product and services cases under California's Unfair Competition Law (UCL), data privacy breach cases, and a special emphasis on vehicle defect litigation. He has a background in securities litigation, antitrust, environmental law, and consumer class action cases.

Prior to joining Capstone, Steven's experience included litigating class actions on behalf of employees and consumers, in addition to representing individuals and small and large companies in various types of litigation, from business disputes to personal injury, financial fraud, construction defects, and products liability. Steven has been instrumental in achieving favorable results for numerous certified classes, including cases against Home Depot USA (for wage and hour and UCL claims); LegalZoom.com, Inc. (claims involving illegal practice of law); Wells Fargo Bank, N.A. (UCL, CLRA, federal Truth in Lending Act [TILA] claims). Steven briefed and help bring about numerous reported decisions including *Fraley v. Facebook*, 830 F.Supp.2d 785 (N.D. Cal. 2011) (defeating a motion to dismiss on claims involving the right to publicity); *Ceja v. Rudolph & Sletten*, 194 Cal.App.4th 584 (Sixth Appellate Div. 2011), affirmed, California Supreme Court, 56 Cal. 4th 1113 (2013) (confirming the test for determining putative spouse status is a subjective one). He also

helped brief and obtained a decision favorable to plaintiffs in a seminal case under California's UCL, *McAdams v. Monier, Inc.*, 182 Cal.App.4th 174 (2010) (deciding only the named class representative needed to satisfy Proposition 64 standing requirements). He received his J.D. with distinction from the Hofstra University School of Law, where he was an associate editor on the Hofstra Law Review, and earned his undergraduate degree in English Literature and Political Science from Rutgers University.

Tarek Zohdy. A senior counsel with Capstone Law, Tarek Zohdy develops, investigates and litigates automotive defect class actions, along with other consumer class actions for breach of warranty and consumer fraud. At Capstone, he has worked on several large-scale automotive class actions from investigation through settlements that have provided significant relief to millions of defrauded car owners. Before joining Capstone, Mr. Zohdy spent several years representing individual consumers in their actions against automobile manufacturers and dealerships for breaches of express and implied warranties pursuant to the Song-Beverly Consumer Warranty Act and the Magnuson-Moss Warranty Act, commonly referred to together as "Lemon Law." He also handled fraudulent misrepresentation and omission cases pursuant to the Consumers Legal Remedies Act. Mr. Zohdy graduated from Louisiana State University *magna cum laude* in 2003, and Boston University School of Law in 2006, where he was a member of the criminal clinic representing underprivileged criminal defendants.

Associates

Brandon Brouillette. Brandon Brouillette is an associate with Capstone Law, where his practice focuses on representing employees and consumers in complex litigation, primarily wage-and-hour class actions and PAGA representative actions. Mr. Brouillette's entire legal career has been devoted to representing individual and class representative plaintiffs against large corporate entities. Prior to joining Capstone, he served as an associate at Boucher LLP where he managed the firm's wage-and-hour class actions. He earned his Juris Doctor from Loyola Law School, Los Angeles, where he spent a summer interning for the legal clearance and corporate legal departments at Warner Bros. He received his undergraduate degree from the University of Southern California, where he majored in Business Administration and spent a semester abroad in Budapest, Hungary. In 2016, Brandon was selected as one of Super Lawyers' "Rising Stars" in Southern California.

Joseph Hakakian. Joseph Hakakian is an associate with Capstone Law. His practice focuses on prosecuting wage-and-hour class and representative actions in state and federal court. Prior to joining Capstone Law, Mr. Hakakian served as a summer clerk for Mark Ozzello at Markun Zusman Freniere & Compton, LLP, working on various actions including wage-and-hour claims, unpaid overtime, false advertising, and unfair competition. He graduated from UCLA School of Law, with a business law specialization, where he served as a staff editor for the Journal of Environmental Law and Policy and worked as a law clerk with the Consumer Protection Division of the Los Angeles District Attorney's Office. Prior to attending law school, Mr. Hakakian received his undergraduate degree from University of California, Los Angeles, in 2013, where he graduated summa cum laude, Dean's Honor List, and College Honors, and received scholastic achievement awards from Golden Key Honor Society and Phi Alpha Theta Honor Society. Joseph is an active member of the Consumer Attorneys Association of Los Angeles (CAALA), Consumer Attorneys of California (CAOC), and Beverly Hills, Los Angeles County, and Santa Monica Bar Associations.

Michelle Kennedy. Michelle Kennedy is an associate with Capstone Law. Her practice focuses on analyzing pre-litigation wage-and-hour and consumer claims, including claims for overtime wages, meal and rest periods, and off-the-clock work violations. She began her career as a contract attorney in the Utah Attorney General's Civil Litigation Division handling torts, civil rights, and employment law matters. She later founded

her own firm handling business and intellectual property matters, where she settled a copyright infringement suit. Prior to moving to Southern California, Ms. Kennedy was recognized by Super Lawyers as a Mountain States Rising Star in 2017 and 2018. She also served as President of the Utah Minority Bar Association and as an Ex-Officio Member of the Utah State Bar Commission. Michelle graduated from the University of Utah S.J. Quinney College of Law in 2013, where she served as President of the Art Law Alliance and Vice President of the Minority Law Caucus. She earned her undergraduate degree from Brigham Young University in 2010, where she majored in Philosophy. Ms. Kennedy is an active member of the Consumer Attorneys Association of Los Angeles (CAALA) and the Los Angeles County Bar Association. Michelle is admitted to practice law in Utah and California.

Alexander Lima. Alexander Lima is an associate with Capstone Law. His practice focuses on evaluating pre-litigation wage-and-hour claims, including potential violations of overtime and minimum wage law, meal and rest period requirements, and off-the-clock work issues, as well as consumer protection claims. Previously, Mr. Lima was an associate at a California civil litigation practice representing individuals and entities in real estate disputes. He graduated from Santa Clara University, School of Law in 2018, where he served as an Executive Board Member of the Honors Moot Court and was selected as a regional finalist for the American Bar Association Negotiation Competition. He received his undergraduate degree from the University of California, Riverside in 2014.

Trisha Monesi. Trisha Monesi is an associate with Capstone. Her practice focuses on prosecuting consumer class actions in state and federal court. Ms. Monesi graduated from Loyola Law School, Los Angeles in 2014, where she served as an editor of the Loyola of Los Angeles Entertainment Law Review and was a certified law clerk at the Center for Juvenile Law and Policy. She earned her undergraduate degree from Boston University in 2011, where she majored in Political Science and International Relations. She is an active member of the Women Lawyers Association of Los Angeles, and the Los Angeles County and Beverly Hills Bar Associations.

Cody Padgett. An associate with Capstone, Cody Padgett's practice focuses on prosecuting automotive defect and other consumer class action cases in state and federal court. He handles consumer cases at all stages of litigation, and has contributed to major settlements of automobile defect actions valued in the tens of millions. Prior to joining Capstone Law, Mr. Padgett was a certified legal intern with the San Diego County Public Defender's Office. During law school, Mr. Padgett served as a judicial extern to the Honorable C. Leroy Hansen, United States District Court for the District of New Mexico. He graduated from California Western School of Law in the top 10% of his class and received his undergraduate degree from the University of Southern California, where he graduated *cum laude*.

Julian Quattlebaum. Julian Quattlebaum is an associate with Capstone. His practice focuses on analyzing pre-litigation wage-and-hour and consumer claims, including claims for overtime wages, meal and rest periods, and off-the-clock work violations. He began his career at an entertainment law firm, handling intellectual property matters, copyright infringement disputes, and contract litigation. During his time at the firm, he authored an amicus brief that was quoted in oral argument before the Ninth Circuit Court of Appeals during en banc review. Later, he helped author an appellate brief regarding the rights to the storyline of a successful Disney film franchise. Mr. Quattlebaum graduated from Emory University School of Law in 2019. While there, he was a member of the Moot Court Society, representing the school at the NYU Immigration Law competition in his second year, and the National Competition in his third year. He was given the Society's Award for Excellence in Oral Advocacy and was inducted into the Order of Emory



Advocates. He earned his undergraduate degree from the University of Colorado Boulder in 2015, where he majored in Evolutionary Biology.

OUTREACH AND EDUCATION

To increase public awareness about the issues affecting class action and other representative litigation in the consumer and employment areas, Capstone publishes the Impact Litigation Journal (www.impactlitigation.com). Readers have access to news bulletins, op-ed pieces, and legal resources. By taking advantage of social media, Capstone hopes to spread the word about consumer protection and employee rights to a larger audience than has typically been reached by traditional print sources, and to thereby contribute to the enforcement of California's consumer and workplace protection laws.

Exhibit 2



6383 Arizona Circle
Los Angeles, CA 90045

Phone: (888) 882-6878

Fax: (888) 883-2946

CourtCall.com

Court Conference® is a division of CourtCall®

INVOICE / RECEIPT

04/26/2021 07:43 AM

All amounts below are in **U.S. Dollars**

COURTCALL ID: 10887149

CASE NUMBER/NAME: 06-CIVDS2013220 / Tony Doyle vs. CBOCS West Inc.

CUSTOMER REF. NUMBER:

PROCEEDING: Case Management Conference

DATE OF HEARING: Monday, October 5th, 2020 at 8:55 AM PT

FIRM NAME: Capstone Law, APC

ATTORNEY/PARTY APPEARING: Mark A. Ozzello

TELEPHONE: (310) 556-4811

FAX/EMAIL: (310) 943-0396

BASIC FEE/LATE FEE: \$94.00

VIDEO FEE/LATE FEE: \$0.00

AMOUNT PAID: \$94.00

PAYMENT NOW DUE: \$0.00

Payment Details

Method	Type	Amount	Reference	Date/Time
Credit	Charge	\$94.00		10/7/2020 7:00:22AM

If the 'Payment Now Due' indicated above is zero, no payment is due and this receipt is for your records only; otherwise, the amount indicated is now due.

If there is an amount due, please remit your payment upon receipt of this notice. If you have already sent payment please contact our Accounting Department as our records do not reflect receipt of payment at the time this notice was sent. IF PAYMENT IS NOT RECEIVED, FUTURE SERVICE MAY BE DENIED AND/OR THE COURT MAY BE ADVISED OF YOUR REFUSAL TO PAY.

PAYMENT BY CREDIT CARD or COURTCALL DEBIT ACCOUNT: Payment can be made online by registering and logging in at www.courtcall.com or by calling (888) 882-6878 and selecting option '5' for the Accounting Department. Please have your CourtCall Debit Account number or complete credit card billing address in addition to the credit card number, expiration date and cardholder's full name available when making payment.

PLEASE DETACH AND RETURN THE PORTION BELOW IF PAYING BY CHECK OR MONEY ORDER

PAYMENT BY CHECK OR MONEY ORDER: If a balance is due detach and mail this payment section with your check, payable to: **CourtCall LLC, 6383 Arizona Circle. Los Angeles, CA 90045.** Please write the CourtCall ID number in the memo section of your check. Please note: CourtCall does not accept personal checks.

COURTCALL ID: 10887149

CASE NAME/NUMBER: 06-CIVDS2013220 / Tony Doyle vs. CBOCS West Inc.

CUSTOMER REF. NUMBER:

PROCEEDING: Case Management Conference

DATE OF HEARING: Monday, October 5th, 2020 at 8:55 AM PT

FIRM NAME: Capstone Law, APC

ATTORNEY/PARTY APPEARING: Mark A. Ozzello

TELEPHONE: (310) 556-4811



6383 Arizona Circle
Los Angeles, CA 90045

Phone: (888) 882-6878

Fax: (888) 883-2946

CourtCall.com

Court Conference® is a division of CourtCall®

INVOICE / RECEIPT

01/06/2021 07:20 AM

All amounts below are in **U.S. Dollars**

COURTCALL ID: 11025902

CASE NUMBER/NAME: 07-CIVDS2013220 / Tony Doyle vs. CBOCS West Cracker-barrel

CUSTOMER REF. NUMBER:

PROCEEDING: Case Management Conference

DATE OF HEARING: Tuesday, January 5th, 2021 at 8:55 AM PT

FIRM NAME: Capstone Law, APC

ATTORNEY/PARTY APPEARING: Brandon K. Brouillette

TELEPHONE: (310) 556-4811

FAX/EMAIL: (310) 943-0396

BASIC FEE/LATE FEE: \$94.00

VIDEO FEE/LATE FEE: \$0.00

AMOUNT PAID: \$94.00

PAYMENT NOW DUE: \$0.00

Payment Details

Method	Type	Amount	Reference	Date/Time
Credit	Charge	\$94.00		1/6/2021 7:19:47AM

If the 'Payment Now Due' indicated above is zero, no payment is due and this receipt is for your records only; otherwise, the amount indicated is now due.

If there is an amount due, please remit your payment upon receipt of this notice. If you have already sent payment please contact our Accounting Department as our records do not reflect receipt of payment at the time this notice was sent. IF PAYMENT IS NOT RECEIVED, FUTURE SERVICE MAY BE DENIED AND/OR THE COURT MAY BE ADVISED OF YOUR REFUSAL TO PAY.

PAYMENT BY CREDIT CARD or COURTCALL DEBIT ACCOUNT: Payment can be made online by registering and logging in at www.courtcall.com or by calling (888) 882-6878 and selecting option '5' for the Accounting Department. Please have your CourtCall Debit Account number or complete credit card billing address in addition to the credit card number, expiration date and cardholder's full name available when making payment.

PLEASE DETACH AND RETURN THE PORTION BELOW IF PAYING BY CHECK OR MONEY ORDER

PAYMENT BY CHECK OR MONEY ORDER: If a balance is due detach and mail this payment section with your check, payable to: **CourtCall LLC, 6383 Arizona Circle. Los Angeles, CA 90045.** Please write the CourtCall ID number in the memo section of your check. Please note: CourtCall does not accept personal checks.

COURTCALL ID: 11025902

CASE NAME/NUMBER: 07-CIVDS2013220 / Tony Doyle vs. CBOCS West Cracker-barrel

CUSTOMER REF. NUMBER:

PROCEEDING: Case Management Conference

DATE OF HEARING: Tuesday, January 5th, 2021 at 8:55 AM PT

FIRM NAME: Capstone Law, APC

ATTORNEY/PARTY APPEARING: Brandon K. Brouillette

TELEPHONE: (310) 556-4811



6383 Arizona Circle
Los Angeles, CA 90045
Phone: (888) 882-6878
Fax: (888) 883-2946
CourtCall.com

Court Conference® is a division of CourtCall®

INVOICE / RECEIPT

03/25/2021 07:06 AM

All amounts below are in **U.S. Dollars**

COURTCALL ID: 11147947
CASE NUMBER/NAME: 09-CIVDS2013220 / Tony Doyle vs. CBOCS West Inc.
CUSTOMER REF. NUMBER:
PROCEEDING: Case Management Conference
DATE OF HEARING: Wednesday, March 24th, 2021 at 9:55 AM PT
FIRM NAME: Capstone Law, APC
ATTORNEY/PARTY APPEARING: Mark A. Ozzello
TELEPHONE: (310) 556-4811
FAX/EMAIL: (310) 943-0396
BASIC FEE/LATE FEE: \$94.00
VIDEO FEE/LATE FEE: \$0.00
AMOUNT PAID: \$94.00
PAYMENT NOW DUE: \$0.00

Payment Details

Method	Type	Amount	Reference	Date/Time
Credit	Charge	\$94.00		3/25/2021 7:05:49AM

If the 'Payment Now Due' indicated above is zero, no payment is due and this receipt is for your records only; otherwise, the amount indicated is now due.

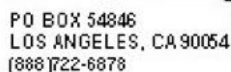
If there is an amount due, please remit your payment upon receipt of this notice. If you have already sent payment please contact our Accounting Department as our records do not reflect receipt of payment at the time this notice was sent. IF PAYMENT IS NOT RECEIVED, FUTURE SERVICE MAY BE DENIED AND/OR THE COURT MAY BE ADVISED OF YOUR REFUSAL TO PAY.

PAYMENT BY CREDIT CARD or COURTCALL DEBIT ACCOUNT: Payment can be made online by registering and logging in at www.courtcall.com or by calling (888) 882-6878 and selecting option '5' for the Accounting Department. Please have your CourtCall Debit Account number or complete credit card billing address in addition to the credit card number, expiration date and cardholder's full name available when making payment.

PLEASE DETACH AND RETURN THE PORTION BELOW IF PAYING BY CHECK OR MONEY ORDER

PAYMENT BY CHECK OR MONEY ORDER: If a balance is due detach and mail this payment section with your check, payable to: **CourtCall LLC, 6383 Arizona Circle. Los Angeles, CA 90045.** Please write the CourtCall ID number in the memo section of your check. Please note: CourtCall does not accept personal checks.

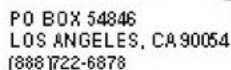
COURTCALL ID: 11147947
CASE NAME/NUMBER: 09-CIVDS2013220 / Tony Doyle vs. CBOCS West Inc.
CUSTOMER REF. NUMBER:
PROCEEDING: Case Management Conference
DATE OF HEARING: Wednesday, March 24th, 2021 at 9:55 AM PT
FIRM NAME: Capstone Law, APC
ATTORNEY/PARTY APPEARING: Mark A. Ozzello
TELEPHONE: (310) 556-4811



Age Group	Percentage
18-24	~15%
25-34	~35%
35-44	~25%
45-54	~20%
55-64	~15%
65-74	~10%
75-84	~5%
85+	~2%

Alida Meksavanh
Capstone Law Apc
1875 Century Park E Ste 1000
Los Angeles CA 90067

Please detach here and return this portion with your remittance check



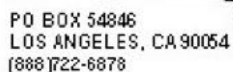
PAYMENT IS DUE UPON RECEIPT

Invoice Date
5/31/2020
Invoice Amount

Summary - Billing References

Description	Total Price
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
TONY DOYLE V CBOS - CRACKER	\$1,210.20
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

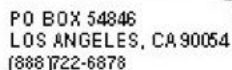




Age Group	Percentage
18-24	~15%
25-34	~35%
35-44	~25%
45-54	~20%
55-64	~15%
65-74	~10%
75-84	~5%
85+	~2%

Alida Meksavanh
Capstone Law Apc
1875 Century Park E Ste 1000
Los Angeles CA 90067

Please detach here and return this portion with your remittance check



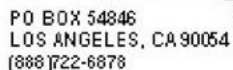
PAYMENT IS DUE UPON RECEIPT

Customer Number	Invoice Date
██████████	7/31/2020
Invoice Number	Invoice Amount
██████████	██████████

Summary - Billing References

[illegible]

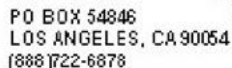
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
TONY DOYLE V CBOS - CRACKER	\$534.95
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]



Age Group	Percentage
18-24	10%
25-34	15%
35-44	10%
45-54	20%
55-64	25%
65-74	20%
75-84	15%
85+	15%

Alida Meksavanh
Capstone Law Apc
1875 Century Park E Ste 1000
Los Angeles CA 90067

Please detach here and return this portion with your remittance check

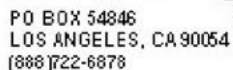


PAYMENT IS DUE UPON RECEIPT

[illegible]

Summary - Billing References

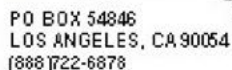
[illegible]



Age Group	Percentage of Respondents
18-29	80%
30-39	75%
40-49	70%
50-59	65%
60 and older	60%

Alida Meksavanh
Capstone Law Apc
1875 Century Park E Ste 1000
Los Angeles CA 90067

Please detach here and return this portion with your remittance check



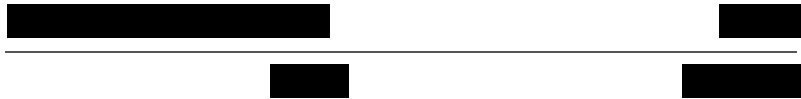
PAYMENT IS DUE UPON RECEIPT

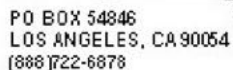
Customer Number

nvoice

Summary - Billing References

[illegible]

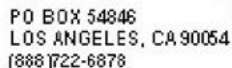




Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	85	15
30-49	85	15
50-69	85	15
70+	85	15

Alida Meksavanh
Capstone Law Apc
1875 Century Park E Ste 1000
Los Angeles CA 90067

Please detach here and return this portion with your remittance check



PAYMENT IS DUE UPON RECEIPT

Customer Number	Invoice Date
██████████	10/31/2020
Invoice Number	Invoice Amount
██████████	██████████

Summary - Billing References

[illegible]



PO BOX 54846
LOS ANGELES, CA 90054
(888) 722-6878

Invoice



Alida Meksavanh
Capstone Law Apc
1875 Century Park E Ste 1000
Los Angeles CA 90067

Please detach here and return this portion with your remittance check



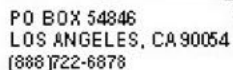
PO BOX 54846
LOS ANGELES, CA 90054
(888) 722-6878

PAYMENT IS DUE UPON RECEIPT

Customer Number	
invoice	0

Summary - Billing References

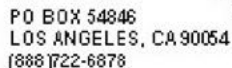
Description	Total Price
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
DOYLE V CBOCS - MK	\$114.95
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]



Age Group	Percentage
18-24	~15%
25-34	~35%
35-44	~25%
45-54	~20%
55-64	~15%
65-74	~10%
75-84	~5%
85+	~2%

Alida Meksavanh
Capstone Law Apc
1875 Century Park E Ste 1000
Los Angeles CA 90067

Please detach here and return this portion with your remittance check



PAYMENT IS DUE UPON RECEIPT

Customer			

Summary - Billing References

[illegible]

Madden Corporation DBA Procourier,
Pasadena
PO BOX 54846
Los Angeles, CA 90054

Credit Memo

Date	Credit No.
10/31/2020	360322

Customer

Alida Meksavanh
Capstone Law Apc
1875 Century Park E Ste 1000
Los Angeles CA 90067

P.O. No.	Project

Description	Qty	Rate	Amount
return of advance for rejected filing #2502974	-1	150.00	-150.00
		Total	-\$150.00

Invoices \$0.00

Balance Credit -\$150.00