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Attorneys for Plaintiff Evanina Alaniz, individually
and on behalf of all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE**

In re WATER WAGE AND HOUR CASES
Coordination Proceedings Special Title
(C.R.C. Rule 3.550)

Included Actions:

*Daniel Carillo-Salazar v. Watermark Services, IV,
LLC, et al.*
Orange County Superior Court
Case No. 30-2020-01126766-CU-OE-CXC

*Evanina Alaniz v. Watermark Retirement
Communities LLC, et al.,*
Los Angeles County Superior Court
Case No. 20STCV16386

*Katherine Greene v. Watermark Retirement
Properties, Inc., et al*
Monterey County Superior Court
Case No. 20CV002422

Judicial Counsel Coordination Proceedings No.
JCCP 5176

Assigned for all Purposes to the Honorable
William Claster, Dept. CX104

**DECLARATION OF KRISTY R.
CONNOLLY IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

1 I, Kristy R. Connolly, hereby declare as follows:

2 1. I am an attorney at law licensed to practice before all of the courts of the State of
3 California. I am an Associate Attorney at Aegis Law Firm, PC (“Aegis”), counsel for Plaintiff
4 Tramon Wilson-Davis (“Plaintiff”) in this matter. I am thoroughly familiar with and have personal
5 knowledge of all of the facts set forth herein.

6 2. I submit this declaration in support of Plaintiff’s Motion for Final Approval of Class
7 Action Settlement. If called as a witness, I could and would competently testify thereto.

8 **History of the Litigation**

9 1. On April 29, 2020 Plaintiff filed this action on behalf of Defendant’s non-exempt
10 employees alleging Defendant’s (1) failure to provide meal periods; (2) failure to permit rest breaks;
11 (3) failure to provide accurate wage statements; (4) failure to pay all wages timely and upon
12 separation of employment; and (5) violation of Business and Professions Code § 17200, *et seq.*, based
13 on the preceding claims in the Superior Court of California, County of Los Angeles.

14 2. On April 30, 2020, Plaintiff’s counsel provided written notice to the LWDA and
15 Defendant regarding Defendant’s alleged Labor Code violations, as required by Lab. Code §
16 2699.3(a). The LWDA did not respond to this notice, indicating it did not intend to investigate, thus
17 allowing Plaintiff to bring a PAGA claim against Defendant. As such, on July 17, 2020, Plaintiff
18 filed a First Amended Complaint to allege a PAGA claim.

19 3. Defendant demurred to the First Amended Complaint, arguing the matter should be
20 stayed pending the outcome of the *Carillo-Salazar v. Watermark Services, IV, LLC, et al.* case. On
21 December 2, 2020, the court granted Defendant’s demurrer, except it explicitly provided Plaintiff
22 Alaniz would be allowed to file a petition for coordination.

23 4. Thereafter, Plaintiff Alaniz filed a Petition for Coordination of this action, the *Carillo-*
24 *Salazar* Action, and the *Greene* Action, which was granted by this Court on September 10, 2021.

25 5. After mediation, Plaintiff Alaniz and Plaintiff Carillo-Salazar settled with Defendants
26 and executed a Memorandum of Understanding in March of 2022 with the material terms the parties
27 had agreed to. The Parties spent the next few months negotiating the terms of the Settlement, which
28 was finalized in August of 2022.

6. Class Counsel used their experience to negotiate a suitable settlement that avoided potential pitfalls for the Class and further avoided using up court resources on discovery motions or class certification motions. Initially, Class Counsel spent a significant amount of time in law and motion work to enable the case to proceed as a class action.

Counsel's Qualifications

7. Class Counsel has negotiated a settlement that they consider fair, adequate and reasonable, based on prior experience litigating these types of cases.

8. Aegis Law Firm prosecutes wage and hour cases, including class actions on behalf of employees and others who have had their rights violated. Aegis, either on its own, or with co-counsel is currently serving as plaintiffs' counsel of record in dozens of wage and hour and employment class action cases pending in both state and federal court.

9. The attorneys working on this case have been appointed class counsel in many cases, through both contested motions and settlement approval motions.

10. Aegis has litigated and successfully resolved many wage and hour class action cases involving failure to pay wages and derivative Labor Code claims and penalties. *See, e.g., Roman, et al. v. TRM Manufacturing, Inc.*, Riverside Superior Court, Case No. RIC1706458 (class certification granted on December 17, 2020 for all current and former non-exempt workers' on issues of rounding, meal period, and rest period claims); *Gamboa v. Kamran, et al.*, San Bernardino Superior Court, Case No. CIVDS1605273 (class certification granted on September 16, 2019, for factory workers on issues of rounding, automatic deduction of first meal period, and second meal period); *Romo, et. al, v. GMRI, Inc. d/b/a/ Olive Garden*, United States District Court Central District of California, Case No. EDCV-12-0715-JLQ (class certification granted for restaurant workers' rest period claims); *Sawyer v. Retail Data, LLC*, Orange County Superior Court, Case No. 30-2014-00753767-CU-OE-CXC (unpaid wage and rest break claims for piece rate workers); *Gonzalez v. SFFI Company, Inc., et. al*, San Bernardino County Superior Court, Case No. CIV DS1504287 (unpaid wages, meal period and rest break claims for non-exempt employees); *Antoine v. Riverstone Residential California, Inc., et. al*, Sacramento County Superior Court, Case No. 34-2013-00155974 (rate of pay, on-call time, unpaid wage, meal period, rest break, and expense

1 reimbursement claims for non-exempt employees); *Nguyen v. Pharmerica*, Orange County
2 Superior Court, Case No. 30-2014-00716072-CU-OE-CXC (unpaid wages and unreimbursed
3 expenses for pharmacists); *Orellana v. Westlake*, Los Angeles County Superior Court, Case No.
4 BC539614 (unpaid overtime, meal period and rest break claims for call center employees); *Kent v.*
5 *Mountain View Child Care, Inc.*, Los Angeles County Superior Court, Case No. BC539633
6 (minimum wage, overtime, meal period, and rest break claims for hospital workers); *Durroh v.*
7 *East West Bank*, Los Angeles County Superior Court, Case No. BC528860 (overtime claims for
8 failure to include bonuses in regular rate of pay for bank workers); *O'Brien et al. v. Pizza Hut of*
9 *Southeast Kansas, Inc. et al.*, Riverside County Superior Court, Case No MCC 1301030 (meal
10 period and expense reimbursement claims for delivery drivers); *Bell v. Prime Healthcare*, Orange
11 County Superior Court, Case No. 30-2011-00475240-CU-OE-CXC (overtime claims for failure to
12 include shift premiums in regular rate of pay and failure to provide meal and rest periods to hospital
13 workers), *Grana v. Toys R US-Delaware, Inc.*, Central District of California, Case No. 2:13-cv-
14 01302-DSF-JCG (bag check claims for unpaid wages and failure to provide meal periods and rest
15 breaks to retail employees); *Mendez v. H.J. Heinz Company, L.P., et. al*, Orange County Superior
16 Court, Case No. 30-2013-00644915-CU-OE-CXC (failure to pay all wages to factory workers due
17 to rounding practice); *Fresh & Easy Wage and Hour Cases*, Los Angeles Superior Court, Cas No.
18 JCCP 4705 (failure to provide meal and rest periods to supermarket workers); *Lunsford v Stater*
19 *Bros.*, Riverside Superior Court, Case No. RIC 1104475 (failure to provide meal and rest periods
20 to supermarket workers); *Gregg v. Belo*, Riverside Superior Court, Case No. RIC 523697 (unpaid
21 wages and missed meal and rest periods due to misclassification of newspaper delivery employees);
22 *Brown v. Experian Information Solutions, Inc., et. al.*, Orange County Superior Court, Case No.
23 30-2012-00375163 (misclassification of engineers and similar positions); *Tereth v. Shakey's USA,*
24 *Inc.*, Los Angeles Superior Court, Case No. BC441359 (failure to provide meal and rest periods to
25 restaurant employees); *Azurin v. Harbor Distributing LLC, et. al.*, Los Angeles Superior Court,
26 Case No. BC421392 (failure to pay overtime wages, provide meal and rest periods, and reimburse
27 business expenses to Account Managers); *Caffero v. ABC* (failure to provide meal periods and
28 reimburse expenses of therapists).

1 11. Samuel A. Wong is a graduate of University of Pennsylvania Law School, where he
2 received his J.D. in 2001. Mr. Wong received a Bachelors of Arts in Sociology from the University
3 of California at Berkeley in 1997.

4 12. After graduation from law school in 2001, the same year in which Mr. Wong took
5 and successfully passed the California Bar Exam, Mr. Wong moved to back to Los Angeles,
6 California where he was employed at Paul Hastings, Janofsky & Walker, LLP. While working in
7 the employment department at Paul Hastings, he was involved in numerous wage and hour class
8 action lawsuits and other employment related matters.

9 13. Mr. Wong became a founding partner of Aegis Law Firm, PC in 2003, and focused
10 his practice on plaintiff's side employment work. Throughout his years of practice, Mr. Wong
11 represented and obtained successful outcomes for his clients, including awards through arbitration
12 and trial.

13 14. Mr. Wong is a member of the Orange County Bar Association, Orange County Trial
14 Lawyers Association, and California Employment Lawyers Association.

15 15. Mr. Wong was chosen by Law and Politics Magazine as a Super Lawyer Rising Star,
16 representing one of the top 2.5% of lawyers under 40 in Southern California in 2011, 2012, 2013,
17 and 2014. He was chosen by Law and Politics Magazine as a Super Lawyer in 2015, 2016, 2017,
18 and 2018. Mr. Wong was also chosen as a Top Attorney in the field of employment law by OC
19 Metro in 2014, 2015, and 2018. Mr. Wong currently bills at a rate of \$875 per hour.

20 16. Kashif Haque received his J.D. in 2001 from Washington University School of Law.
21 While in law school, Mr. Haque was a member of the Law Review Editorial Board, author of an
22 article published in the Law Review, Executive Board Member of Moot Court, and a member of
23 the Dean's List. He received a Bachelor's of Science in Business Administration from the
24 University of Central Missouri in 1998, where he was a member of the Beta Alpha Psi honors
25 fraternity.

26 17. Since 2004, Mr. Haque has exclusively focused his practice on plaintiff's
27 employment litigation with a specific focus on wage and hour claims. Since then, he has
28 represented over 500,000 employees with their employment claims, many of which included wage

1 and hour claims. He has been appointed class counsel in approximately 100 cases and is currently
2 litigating over 150 employment wage and hour class action cases.

3 18. Mr. Haque authored a book on employment litigation strategies with West
4 Publishing and has been invited to speak on class action and wage and hour issues on numerous
5 occasions. He has spoken at seminars by the State Bar of California, California Employment
6 Lawyer's Association (CELA), Orange County Bar Association, and various other CLE providers.
7 Mr. Haque is the former Chair for the Labor and Employment Section of the Orange County Bar
8 Association. He was selected as one of the Top 50 Attorneys in Orange County by Super Lawyers
9 for 2017 and 2019. He has been a Super Lawyer for every year from 2009 to the present. OC
10 Register/Metro has selected him as one of the Top 5 Employment Lawyers in Orange County for
11 every year the list was published, from 2012 to 2018. Mr. Haque currently bills at a rate of \$875.00
12 per hour.

13 19. Jessica Campbell is a partner at Aegis Law Firm. Ms. Campbell was admitted to the
14 California Bar in December of 2011, and received her J.D. from Santa Clara University School of
15 Law and her B.A. from the University of California, Berkeley. Ms. Campbell has dedicated her
16 career to plaintiffs' side class actions. Her experience includes successful work on class action
17 appeals, class certification motions, and class settlements. Ms. Campbell was chosen by Law and
18 Politics Magazine as a Super Lawyer Rising Star, representing one of the top 2.5% of lawyers
19 under 40 in Southern California from 2018-2021. Ms. Campbell currently bills at a rate of \$750.00
20 per hour.

21 20. I am an associate at Aegis Law Firm. I was admitted to the California Bar in
22 December of 2019. I received my J.D. from Chapman University Dale E. Fowler School of Law
23 where I graduated cum laude. While in law school, I was a recipient of numerous honors, including
24 Merit Scholarships and CALI Awards, and externed for Judge Di Cesare of the Orange County
25 Superior Court. I received my B.A. from the University of California, Davis. Prior to joining Aegis
26 Law Firm, I worked at a midsize civil defense firm focusing on general and professional liability.
27 While at Aegis Law Firm, I primarily represent employees in class and representative wage and
28 hour actions. I currently bill at a rate of \$500 per hour.

21. Carolyn M. Bell is an associate at Aegis Law Firm. Ms. Bell was admitted to the California Bar in December of 2016. She received her J.D. from Whittier Law School, and her B.A. from University of California, Santa Barbara. Prior to joining Aegis Law Firm, Ms. Bell worked at an Orange County civil litigation firm where she focused primarily on plaintiffs'-side employment litigation, and continues to do so at Aegis. Ms. Bell currently bills at \$600.00 an hour.

22. Alexander G.L. Davies is an associate at Aegis Law Firm. Mr. Davies was admitted to the California Bar in December of 2019. He received his J.D. from Chapman University's Dale E. Fowler School of Law, a B.A. from the University of Southern California, and an M.A. in History from California Polytechnic State University, San Luis Obispo. Prior to joining Aegis Law Firm, Mr. Davies worked at an Orange County Workers' Compensation firm where he focused primarily on defense-side litigation. Mr. Davies' billing rate is \$500 which is consistent with the prevailing market rates in the private sector for attorneys at both defense and plaintiff law firms of comparable skill, qualifications and experience. At Aegis Law Firm, Mr. Davies focuses his practice on representing plaintiffs in wage and hour class and representative actions.

Class Counsel's Fees and Costs

23. Aegis' hourly rates are comparable to those charged by other class action plaintiff's counsel and the firms defending class actions. Aegis' hourly rates have been approved by other courts in the same geographical area. *See, e.g., Perez v. Hal Hays*, C.D. Cal, Case No. EDCV 16-01461 AG (SPx) (approving Aegis hourly rates); <http://www.laffeymatrix.com/see.html> (Laffey Matrix).

24. Aegis' current lodestar reflects 123 hours of work resulting in \$81,347.50 in fees, excluding the time Counsel will spend at the final approval hearing and helping with Settlement Administration after final approval. This time could have been spent on other potentially lucrative cases. Aegis dedicated significant resources to this case by dividing the tasks required according to skill level, and the professional hours generated by each attorney are neither unreasonable nor duplicative. Aegis' lodestar reflects the efficiencies achieved by a law firm experienced in this field.

25. The chart below shows the calculation of hours spent by each of Aegis' attorneys on this case.

Attorney	Hours	Hourly Rate	Total
Kashif Haque	34.7	\$875.00	\$30,362.50
Jessica L. Campbell	12.9	\$750.00	\$9,675.00
Carolyn Bell	36.1	\$600.00	\$21,660.00
Kristy R. Connolly	34.7	\$500.00	\$17,350.00
Alexander Davies	4.6	\$500.00	\$2,300.00
Totals	123		\$81,347.50

26. Class Counsel bore the entire risk of recovery. Class Counsel took this case on a pure contingency basis, with no guarantee of any payment. Before mediation, Class Counsel spent significant time on discovery, resolving discovery disputes and preparing for mediation despite the risk of recovering nothing. Had the litigation continued, Defendants would undoubtedly have mounted an aggressive defense at the certification stage and at the merits stage. A defeat at one of these stages could have foreclosed the possibility of Class Counsel recovering any remuneration for their time and effort. Given the extensive discovery and exhaustive negotiations in this case, Class Counsel have achieved a large settlement through efficient and diligent work. The result achieved by Class Counsel in this case merits applying a multiplier to reward counsel for taking on the risk of filing a case, and achieving a great result through efficient means.

27. In litigation costs, Aegis has spent \$1,449.16 on items such as filing fees, copies, postage, and other fees related to the litigation. All of the costs were reasonable and necessary for the prosecution of this case.

Exhibits

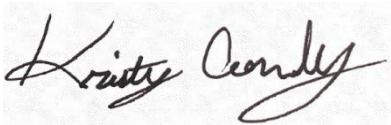
28. A true and correct copy of Class Counsel's cost report is attached hereto as **Exhibit 1.**

29. A true and correct copy of Class Counsel's itemized billing is attached hereto as **Exhibit 2.**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

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Executed on August 16, 2023 at Irvine, California.



Kristy R. Connolly

EXHIBIT 1

Date Completed	Task Completed	Attorney	Hours	Rate	Total
4/27/2020	reviewed file, corr re potential claims	JC	0.3	750.00	\$225.00
4/27/2020	Reviewed client intake notes, evaluated claims, researched defendant and pending claims	KH	3.3	875.00	\$2,887.50
4/29/2020	drafted complaint and LWDA letter, research re company, reviewed client docs	JC	2.2	750.00	\$1,650.00
4/29/2020	Talked to intake coordinator re follow up questions and documents	KH	0.4	875.00	\$350.00
5/1/2020	Researched previous cases, analyzed theories in previous cases, evaluated strength of potential claims	KH	4.1	875.00	\$3,587.50
5/4/2020	corr re complaint filing and service	JC	0.1	750.00	\$75.00
5/5/2020	reviewed service packet, corr re adding standard LA documents	JC	0.2	750.00	\$150.00
5/5/2020	Conduct background investigation re client; further research re defendant; ownership and financial condition of defendants	KH	2.4	875.00	\$2,100.00
5/13/2020	Review Notice of CMC, draft notice of ruling re same	JC	0.3	750.00	\$225.00
5/18/2020	Researched assigned judge	KH	0.6	875.00	\$525.00
5/26/2020	Review Def's meet and confer letter re demurrer	JC	0.6	750.00	\$450.00
6/2/2020	TC w/OPC re demurrer, corr re same	JC	0.2	750.00	\$150.00
6/9/2020	Evaluated Defendant's Demurrer to Complaint, researched opposing counsel	KH	2.6	875.00	\$2,275.00
7/6/2020	mtg w/ JC re case introduction	CB	0.5	600.00	\$300.00
7/8/2020	file review	CB	2.5	600.00	\$1,500.00
7/15/2020	reviewed case status, corr w/CB and AA re next steps	JC	0.2	750.00	\$150.00
7/17/2020	drafted FAC	CB	0.9	600.00	\$540.00
7/27/2020	Review OPC email re demurrer	JC	0.2	750.00	\$150.00
8/11/2020	Reviewed and analyzed demurrer	CB	1.8	600.00	\$1,080.00
8/11/2020	TC w/ JC re Demurrer	CB	0.4	600.00	\$240.00
8/11/2020	Reviewed DMR, TC w/CB re same	JC	1.6	750.00	\$1,200.00
8/13/2020	corr w/ JC re FAC	CB	0.2	600.00	\$120.00
8/13/2020	served FAC on Dfdts	CB	0.3	600.00	\$180.00
8/26/2020	corr w/ OPC re responsive pleading	CB	0.5	600.00	\$300.00
8/26/2020	corr w/ JC re demurrer	CB	0.2	600.00	\$120.00
8/28/2020	review ROA; 9/18 demurrer taken off calendar	CB	0.3	600.00	\$180.00
9/3/2020	corr w/ staff re demurrer	CB	0.2	600.00	\$120.00
9/3/2020	Reviewed Demurrer to FAC	KH	1.4	875.00	\$1,225.00
9/9/2020	corr w/ staff re FAC	CB	0.2	600.00	\$120.00
9/9/2020	research prior cases against Dfdt	CB	1.5	600.00	\$900.00
10/2/2020	review docs from DIR; corr re same	CB	2.8	600.00	\$1,680.00
10/19/2020	drafted CM110	CB	0.5	600.00	\$300.00

10/21/2020	Drafted memo re potential overlap of related cases	CB	1.8	600.00	\$1,080.00
10/22/2020	corr w/ staff re CMC	CB	0.3	600.00	\$180.00
11/2/2020	corr w/ JC re demurrer	CB	0.3	600.00	\$180.00
11/3/2020	review status conf order	CB	0.3	600.00	\$180.00
11/3/2020	prep/appeared for CMC; DS stay lifted; Trial set 2/2/22	CB	1	600.00	\$600.00
11/3/2020	draft/serve DS to all defendants	CB	1	600.00	\$600.00
11/9/2020	Reviewed Minute Order from CMC and Dpt 55 Status Conference Order	KH	0.5	875.00	\$437.50
11/11/2020	Met w/ XD re dmr opp	CB	0.4	600.00	\$240.00
11/11/2020	(1) Email Correspondence with Partner (JC) - reviewed Partner's email (2) Met with Partner regarding 11/9/20 email and coordinating with Associate (CB) on Drafting Opposition to Defendants' Demurrer to FAC (3) Met with Associate (CB) for case introduction and to discuss strategy for Opposition to Defendant's Demurrer (4) Drafted email to Staff (AD) to pull FAC from related Carillo-Salazar matter (OC Sup. Ct.) (5) Reveiwed Reply email from Staff (AD) (6) Reveiwed FAC in related Carillo-Salazar Matter (7) Drafted Opposition to Defendant's Demurrer to Plaintiff's FAC	XD	4.6	500.00	\$2,300.00
11/16/2020	reviewed draft opp DMR, sent to CB with changes to make	JC	2.4	750.00	\$1,800.00
11/16/2020	Reviewed notice of related case	KH	0.2	875.00	\$175.00
11/17/2020	draft/file Opp to Demurrer	CB	4	600.00	\$2,400.00
11/17/2020	Review and revise Opposition to Demurrer	KH	2.6	875.00	\$2,275.00
11/20/2020	Review notice of ruling	CB	0.4	600.00	\$240.00
11/24/2020	Reviewed Reply to Demurrer	KH	1.2	875.00	\$1,050.00
11/25/2020	Rev reply to dmr	CB	1.7	600.00	\$1,020.00
12/1/2020	rcv'd tentative; court granted demurrer & req to stay; meet with partners	CB	0.9	600.00	\$540.00
12/1/2020	Met w/ KH and CB re demurrer ruling	JC	0.5	750.00	\$375.00
12/1/2020	Met with Jessica and Carolyn re case strategy	KH	0.5	875.00	\$437.50
12/9/2020	Prep for and attend demurrer hearing	CB	2	600.00	\$1,200.00
12/9/2020	draft/file/serve notice of ruling; pltf can still file Petition for Coordination	CB	0.2	600.00	\$120.00
12/9/2020	corr w/ JC re dmr hearing	CB	0.4	600.00	\$240.00
12/9/2020	TC w/ CB re hearing	JC	0.4	750.00	\$300.00
3/28/2021	drafted petition for coordination	JC	2.9	750.00	\$2,175.00
3/28/2021	Reviewed petition for coordination	KH	1.7	875.00	\$1,487.50
3/30/2021	Check dockets of related cases	CB	0.3	600.00	\$180.00
4/5/2021	corr w/ staff re opp rejected/refiling	CB	0.8	600.00	\$480.00

4/6/2021	review PTC service docs; corr w/ staff re same	CB	1.4	600.00	\$840.00
4/19/2021	corr w/ staff re filed copies of PTC	CB	0.3	600.00	\$180.00
4/21/2021	corr w/ JC re JCCP	CB	0.1	600.00	\$60.00
4/22/2021	confirmed all docs served on correct parties; review email from JCCP and sent conformed copies of Notice to JCCP;	CB	1.5	600.00	\$900.00
4/26/2021	corr w/ staff re related case docs	CB	0.2	600.00	\$120.00
4/26/2021	Reviewed Def's Notice of Intent to Oppose PTC	KH	0.2	875.00	\$175.00
4/27/2021	reviewed ROA in related cases; no update in Carrillo matter; Greene case has CMC statement; asked staff to download	CB	0.3	600.00	\$180.00
5/18/2021	corr w/ Monterey Court to set up atty acct; can't download docs w/o; review related case; no activity since 2/28 CMC	CB	0.4	600.00	\$240.00
6/1/2021	corr w/ Monterey Superior court re doc download; set up atty account; checked JCCP, coordination judge not assigned;	CB	0.3	600.00	\$180.00
6/3/2021	TC w/ Monterery; corr w/ staff re resending PFC	CB	0.5	600.00	\$300.00
7/2/2021	review notice from dfdt/update file	CB	0.2	600.00	\$120.00
7/19/2021	review coordination judge order from JCCP; asked staff to serve on all parties and clerks;	CB	0.5	600.00	\$300.00
7/19/2021	corr w/ JC re coord judge	CB	0.2	600.00	\$120.00
7/30/2021	order assigning coordination motion judge came back returned from Jackson Lewis and Jackson Law; confirmed addresses for both firms match CA bar and website; asked staff to re-serve	CB	0.7	600.00	\$420.00
7/30/2021	rcv'd notice of coordination hearing; served on all parties	CB	0.2	600.00	\$120.00
7/30/2021	Reviewed Notice of Hearing and Order Assigning Judge	KH	0.3	875.00	\$262.50
8/2/2021	order assigning judge and order setting coordinatiion hrng returned underliverable again from Jackson Lewis and Jackson Law; re-served electronically	CB	0.4	600.00	\$240.00
8/2/2021	corr w/ OPC re service	CB	0.3	600.00	\$180.00
8/27/2021	MTG w/KC re case reassign	JC	0.8	750.00	\$600.00
8/27/2021	Review case re new assignment	KC	1.6	500.00	\$800.00
8/30/2021	Review PTC; check docket	KC	0.7	500.00	\$350.00
9/1/2021	Review Carillo-Salazar's statement in response to PTC; draft Petitioner's response	KC	2.8	500.00	\$1,400.00
9/2/2021	Revise Response to Salazar's statement re PTC and file	KC	1.9	500.00	\$950.00
9/2/2021	Revise Pltf Reply re PTC, discussed with Kristy	KH	1.7	875.00	\$1,487.50
9/9/2021	Review Defendant's Opposition; review tentative; prepare for PFC hearing	KC	4.1	500.00	\$2,050.00
9/9/2021	Reviewed Oppositions and Responses, met with Kristy re plan for hearing	KH	2.9	875.00	\$2,537.50

9/10/2021	Prepare for and attend PFC hearing	KC	1.5	500.00	\$750.00
12/8/2021	Check status, no update on docket since PTC hearing	KC	0.1	500.00	\$50.00
12/15/2021	Telephone call w/ Armond Jackson, prep for	KC	0.4	500.00	\$200.00
12/15/2021	Meet w/ KH re settlement	KC	0.6	500.00	\$300.00
12/15/2021	Met with Kristy re settlement of Carillo and Alaniz actions	KH	0.6	875.00	\$525.00
12/16/2021	Left VM for Armond	KC	0.1	500.00	\$50.00
12/21/2021	Telephone call w/ Armond	KC	0.2	500.00	\$100.00
1/7/2022	Returned Armond's call	KC	0.1	500.00	\$50.00
1/7/2022	VM from Armond	KC	0.1	500.00	\$50.00
1/10/2022	Telephone call w/ Armond Jackson	KC	0.2	500.00	\$100.00
1/10/2022	Meet w/ partners	KC	0.3	500.00	\$150.00
1/10/2022	Discussed next steps with Kristy	KH	0.3	875.00	\$262.50
1/13/2022	Telephone call w/ Armond	KC	0.2	500.00	\$100.00
1/19/2022	Telephone call w/ Armond	KC	0.1	500.00	\$50.00
1/21/2022	Telephone call w/ Armond	KC	0.2	500.00	\$100.00
1/25/2022	Telephone call w/ client	KC	0.4	500.00	\$200.00
2/1/2022	Review MOU and revise, discuss with KH	KC	0.8	500.00	\$400.00
2/1/2022	Reviewed MOU	KH	0.4	875.00	\$350.00
2/2/2022	Telephone call w/ Armond; revise MOU	KC	0.4	500.00	\$200.00
2/7/2022	Corr w/ co-counsel re revisions to MOU	KC	0.2	500.00	\$100.00
2/7/2022	Email corr w/ OPC re vacating trial date; review draft stipulation	KC	0.3	500.00	\$150.00
2/9/2022	Review order vacating trial date and setting SC for August 9, 2022 8:30a	KC	0.1	500.00	\$50.00
2/16/2022	Reviewed LA court Non-App Case Review Minute Order	KH	0.1	875.00	\$87.50
2/16/2022	Reviewed Order granting petition for coordination	KH	0.4	875.00	\$350.00
3/1/2022	Email co-counsel re status of MOU	KC	0.1	500.00	\$50.00
3/7/2022	Review Def's revisions to MOU, corr w/ co-counsel re same	KC	0.5	500.00	\$250.00
3/7/2022	Review Def's revisions to MOU	KH	0.4	875.00	\$350.00
3/25/2022	Leave VM for client	KC	0.1	500.00	\$50.00
3/25/2022	Review final MOU, email co-counsel re settlement	KC	0.2	500.00	\$100.00
3/25/2022	Telephone call w/ client	KC	0.2	500.00	\$100.00
3/28/2022	Send signed MOU to co-counsel	KC	0.1	500.00	\$50.00
4/4/2022	Draft settlement agreement, send to co-counsel	KC	2.6	500.00	\$1,300.00
4/4/2022	Reviewed settlement agreement	KH	1	875.00	\$875.00
4/14/2022	Further email to co-counsel re settlement agreement	KC	0.1	500.00	\$50.00
4/18/2022	Review co-counsel's proposed class notice and revisions to settlement agreement; redline and send back	KC	1.7	500.00	\$850.00
5/16/2022	VM from client	KC	0.1	500.00	\$50.00

5/16/2022	Telephone call w/ client	KC	0.2	500.00	\$100.00
8/1/2022	Review OPC's final revisions to settlement agreement and notice packet; corr w/ co-counsel re same, approve for signatures	KC	0.5	500.00	\$250.00
8/1/2022	Reviewed final settlement agreement	KH	1.3	875.00	\$1,137.50
8/2/2022	Draft joint statement and send to OPC	KC	0.4	500.00	\$200.00
8/3/2022	Left VM for client re settlement	KC	0.1	500.00	\$50.00
8/3/2022	Telephone call w/ client	KC	0.1	500.00	\$50.00
8/4/2022	Send Alaniz' signature on settlement to co-counsel	KC	0.1	500.00	\$50.00
8/9/2022	Appear at status conf; draft ntc of ruling	KC	0.3	500.00	\$150.00
8/26/2022	Email co-counsel re MPA	KC	0.1	500.00	\$50.00
8/30/2022	Draft declarations ISO MPA; telephone call w/ client	KC	0.6	500.00	\$300.00
10/3/2022	Email co-counsel re status of MPA	KC	0.1	500.00	\$50.00
10/3/2022	Corr w/ co-counsel re mpa	KC	0.1	500.00	\$50.00
10/25/2022	Email co-counsel re status of MPA	KC	0.1	500.00	\$50.00
11/21/2022	Check dockets	KC	0.2	500.00	\$100.00
11/28/2022	Check docket - SAC filed in Carillo case	KC	0.1	500.00	\$50.00
12/2/2022	Review revised MPA and corr w. co-counsel re same	KC	0.6	500.00	\$300.00
12/5/2022	Review filed MPA	KH	0.8	875.00	\$700.00
12/19/2022	Review Ntc Assigning Coordination Judge, draft Notice of Order and serve to all parties, including clerks	KC	0.4	500.00	\$200.00
1/12/2023	Review MO continuing MPA, update calendar	KC	0.5	500.00	\$250.00
2/3/2023	Corr w/ OPC re continuing CMC, review stipulation re same	KC	0.2	500.00	\$100.00
2/13/2023	Redline settlement, class notice, and draft dispute form pursuant to Court's MPA order, corr w/ co-counsel re same	KC	1.4	500.00	\$700.00
2/13/2023	Reviewed Court's MPA order, discussed with Kristy	KH	0.6	875.00	\$525.00
2/24/2023	OPC confirmed settlement, asked EG to get client sig	KC	0.1	500.00	\$50.00
2/28/2023	Phone call w/ client	KC	0.2	500.00	\$100.00
3/1/2023	Send executed settlement to counsel	KC	0.1	500.00	\$50.00
3/2/2023	Review plaintiff's supp declaration	KC	0.2	500.00	\$100.00
3/9/2023	Review tentative granting prelim, corr w/ counsel, update calendar	KC	0.2	500.00	\$100.00
3/9/2023	Reviewed tentative re MPA	KH	0.2	875.00	\$175.00
3/10/2023	Attend MPA hearing	KC	0.2	500.00	\$100.00
3/20/2023	Email co-counsel re filing of revised order	KC	0.1	500.00	\$50.00
3/31/2023	Review order granting MPA, calendar mailing dates	KC	0.2	500.00	\$100.00
3/31/2023	Reviewed Order re MPA	KH	0.2	875.00	\$175.00

5/4/2023	Calendar new mailing dates based on Def's late production of class data	KC	0.1	500.00	\$50.00
5/9/2023	Admin working out discrepancies in data w/ OPC	KC	0.1	500.00	\$50.00
5/15/2023	Review new calculations based on pro rata trigger, approve	KC	0.3	500.00	\$150.00
5/30/2023	Review and approve revised settlement calculations	KC	0.2	500.00	\$100.00
5/30/2023	Call w/ client	KC	0.2	500.00	\$100.00
6/5/2023	Draft stip to cont CMC, corr w/ OPC re same	KC	0.3	500.00	\$150.00
6/6/2023	Fu email to OPC re stip to continue cmc	KC	0.1	500.00	\$50.00
6/15/2023	Update from admin, notices to be mailed out today	KC	0.1	500.00	\$50.00
7/7/2023	Review admin status report re mailed notices	KH	0.1	875.00	\$87.50
7/18/2023	Review admin status report re mailed notices	KH	0.1	875.00	\$87.50
7/27/2023	Call w/ client	KC	0.2	500.00	\$100.00
7/30/2023	Review admin status report re mailed notices	KH	0.1	875.00	\$87.50
7/31/2023	Corr w/ admin re disputes	KC	0.1	500.00	\$50.00
8/2/2023	Corr w/ co-counsel re MFA	KC	0.1	500.00	\$50.00
8/3/2023	Corr w/ partners re final approval	KC	0.3	500.00	\$150.00
8/8/2023	Corr w/ class member	KC	0.2	500.00	\$100.00
8/10/2023	Draft MFA docs	KC	1.7	500.00	\$850.00
8/11/2023	Reviewed MFA filings	KH	1.2	875.00	\$1,050.00
8/14/2023	Reviewed admin declaration	KH	0.3	875.00	\$262.50
8/15/2023	Corr w/ admin re declarations	KC	0.2	500.00	\$100.00
Totals			123.0		\$81,347.50

EXHIBIT 2

Matter Billing Detail

Report Date: 8/15/2023
 Report Time: 5:20PM
 Page: 1 of 2
 User ID: Carlsen

Aegis Law Firm, PC

Date Range: 01/01/1900 to 08/15/2023
 Client: 547247 - Eva Alaniz
 Matter: 1601 - Alaniz v. Watermark Retirement Communities (PAGA)

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
04/29/2020	RES	Pulled documents from OCSC.	\$7.99		Unbilled				
04/30/2020	FF	Vendor: First Legal Network, LLC; Invoice #: 30126978; Date: 4/30/2020 - Filing Fee-Complaint	\$485.25		Unbilled			6950	First Legal Network, LLC
05/04/2020	AFF	Vendor: Department of Industrial Relations; Date: 5/4/2020 - Administrative Filing Fee-CM-785016-20	\$75.00		Unbilled			6935	Department of Industrial Relatio
05/05/2020	SOP	Service of Process - Watermark Retirement Communities	\$136.05		Unbilled				
05/05/2020	SOP	Service of Process	\$48.65		Unbilled				
05/05/2020	SOP	Service of Process - Watermark Services, IV	\$48.65		Unbilled				
07/17/2020	AFF	Administrative Filing Fee-FAC	\$6.75		Unbilled				
10/22/2020	AFF	Administrative Filing Fee- CMS	\$6.75		Unbilled				
11/11/2020	RES	Database Research Fee- FAC	\$8.97		Unbilled				
11/17/2020	RES	Database Research Fee- SCS [2]	\$15.00		Unbilled				
11/18/2020	AFF	Administrative Filing Fee- Opposition	\$14.15		Unbilled				
12/09/2020	AFF	Administrative Filing Fee- Ntc. of Ruling	\$6.75		Unbilled				
04/02/2021	AFF	Administrative Filing Fee - Ntc of Submission of Petition for Coordination [Alaniz]	\$10.95		Unbilled				
04/02/2021	AFF	Administrative Filing Fee - Ntc of Submission of Petition for Coordination [Carrillo-Salazar]	\$9.00		Unbilled				
04/02/2021	AFF	Administrative Filing Fee - Ntc of Submission of Petition for Coordination [Green]	\$10.50		Unbilled				
04/05/2021	AFF	Administrative Filing Fee - Lodging of Ntc of Submission of Petition for Coordination [Carrillo-Salazar]	\$29.25		Unbilled				
07/30/2021	CTC	Court Call - Motion	\$94.00		Unbilled				
09/02/2021	AFF	Administrative Filing Fee - Reply	\$9.00		Unbilled				
09/07/2021	CTC	Court Call - Motion	\$94.00		Unbilled				
08/03/2022	FF	Filing Fee - JCMCS	\$10.95		Unbilled				
08/09/2022	FF	Filing Fee - Ntc of Ruling	\$10.95		Unbilled				

Matter Billing Detail

Aegis Law Firm, PC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
06/06/2023	FF	Filing Fee	\$32.35		Unbilled				
08/15/2023	CC	Cumulative Copies, Faxes, Scans, Postage	\$278.25		Unbilled				
Total:			\$1,449.16	\$0.00					
Balance:			\$1,449.16						
Total Fees Billed- -----			\$0.00						
Total Fees Unbilled : -----			\$0.00						
Total Fees Received : -----			\$0.00						
Total Soft Cost Billed : -----			\$0.00						
Total Soft Cost Unbilled : -----			\$0.00						
Total Soft Cost Received : -----			\$0.00						
Total Hard Cost Billed : -----			\$0.00						
Total Hard Cost Unbilled : -----			\$1,449.16						
Total Hard Cost Received : -----			\$0.00						
Total Taxes Billed : -----			\$0.00						
Total Taxes Unbilled : -----			\$0.00						
Total Taxes Received : -----			\$0.00						
Total Late Charges Billed : -----			\$0.00						
Total Late Charges Unbilled: -----			\$0.00						
Total Late Charges Received : -----			\$0.00						
Trust Balance: -----			\$0.00						