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BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

NORMAN RESPASS, an individual, on
behalf of himself, and on behalf of all persons
similarly situated,

Plaintiff,
vs.

THE SCION GROUP LLC, a Limited
Liability Company; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 34-2020-00285285

**DECLARATION OF NICHOLAS J. DE
BLOUW, ESQ. IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS AND
PAGA ACTION SETTLEMENT**

Date: August 11, 2023
Time: 9:00 a.m.

Judge: Hon. Lauri A. Damrell
Dept.: 28

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)

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1 I, NICHOLAS J. DE BLOUW, declare as follows:

2 1. I am a partner of the law firm of Blumenthal, Nordrehaug, Bhowmik, De Blouw,
3 LLP (“BNBD”), co-counsel of record for Plaintiff NORMAN RESPASS (“Plaintiff”) in this matter.
4 As such, I am fully familiar with the facts, pleadings, and history of the matter. I am submitting
5 this declaration in support of Plaintiff’s motion for an award of attorneys’ fees, costs, and service
6 awards in connection with services rendered in the above-entitled action and the requested service
7 award. The following facts are within my own personal knowledge, and if called as a witness, I
8 could and would testify competently to the matters stated herein.

9 2. BNBD has been approved as class counsel and PAGA counsel in numerous other
10 wage and hour and PAGA actions that have been granted approval. Attached hereto as **Exhibit #1**
11 is a true and correct copy of the Blumenthal, Nordrehaug, Bhowmik & De Blouw, LLP, *curriculum*
12 *vitae*, setting forth in detail the firm’s qualifications as Class Counsel.

13 3. To date, BNBD has incurred approximately 160.65 hours on this case. Thus, I
14 anticipate the total amount of BNBD’s fees incurred in this case to be approximately \$96,885.75.
15 BNBD has also incurred hard costs to date in the amount of \$14,452.36. Attached hereto as **Exhibit**
16 **#2** is a true and correct copy of the firm’s contemporaneous time billing records and litigation cost
17 summary.

18 4. BNBD has represented hundreds of thousands of employees in hundreds of legal
19 matters, including PAGA lawsuits and hundreds of class actions and complex litigation cases.
20 BNBD’s practice is devoted almost entirely to the prosecution of wage and hour class action and
21 PAGA action matters. The attorneys at BNBD have been appointed lead counsel in numerous
22 motions for class certification including many consolidated wage and hour matters.

23 5. Over the course of this litigation a number of attorneys have worked on this matter.
24 Their credentials are reflected in the Blumenthal, Nordrehaug, Bhowmik, De Blouw, LLP firm
25 resume, a true and correct copy of which is attached hereto. Some of the major cases our firm has
26 undertaken are also set forth in the firm resume. The bulk of the attorneys involved in this matter
27 have had extensive class litigation experience, much of it in the area of employment class actions,
28 unfair business practices and other complex litigation. The attorneys at my firm have extensive

1 experience in cases involving labor code violations and overtime claims. Class Counsel has
2 litigated similar wage and hour class action cases against other employers on behalf of employees,
3 including cases against Panda Express, Solarcity, Space Exploration, Union Bank, Verizon, Apple,
4 Wells Fargo, Kaiser, Universal Protection Services, and California State Automobile Association.
5 It is this level of experience which enabled the firms to undertake the instant matter and to
6 successfully combat the resources of the Defendant and their capable and experienced counsel. On
7 account of the concerted and dedicated effort this case required in order to properly handle and
8 prosecute, Class Counsel were precluded from taking other cases, and in fact, had to turn away other
9 potential fee generating cases.

10 6. The hourly rates for staff at BNBD are as follows: Partner Attorneys \$695 to \$795,
11 Associate Attorneys from \$475 to \$575, paralegals \$250 to \$275. The rates charged by BNBD are
12 in line with the prevailing rates of attorneys in the local legal community for similar work and, if
13 this were a commercial matter, these are charges that would be made and presented to the client.
14 These hourly rates have been approved by Courts throughout California. Finally, the
15 reasonableness of BNBD's hourly rates is further confirmed by comparing such rates with the rates
16 of comparable counsel practicing complex and class litigation as detailed in the National Law
17 Journal Billing Survey. See e.g. *Zest IP Holdings, LLC v. Implant Direct MFG., LLC*, 2014 U.S.
18 Dist. LEXIS 167563 (S.D. Cal. 2014) (finding that "Mayer Brown's \$775 average billing rate for
19 partners" and "Mayer Brown's \$543 average associate billing rate" are reasonable rates when
20 compared within 21 other firms practicing in the Southern District of California.) This survey is
21 useful to show that BNBD's rates are in line with the comparable rates of defense counsel that
22 opposes these types of class and PAGA claims, such as Mayer Brown noted above.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing
24 is true and correct. Executed this 18th day of July 2023, at La Jolla, California.

25
26 By: Nicholas J. De Blouw
Nicholas J. De Blouw (Jul 18, 2023 12:00 PDT)

27 Nicholas J. De Blouw
28

EXHIBIT 1

Blumenthal Nordrehaug Bhowmik De Blouw LLP

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Fax: (885) 551-1232

FIRM RESUME

Areas of Practice: Employee, Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation, Business Litigation.

ATTORNEY BIOGRAPHIES

Norman B. Blumenthal

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Action, Civil Litigation, Wage and Hour Class Actions, Transactional Law

Admitted: 1973, Illinois; 1976, California

Biography: Law Clerk to Justice Thomas J. Moran, Illinois Supreme Court, 1973-1975, while on Illinois Court of Appeals. Instructor, Oil and Gas Law: California Western School of Law, 1981; University of San Diego School of Law, 1983. Sole Practitioner 1976-1987. Partner, Blumenthal & Ostroff, 1988-1995. Partner, Blumenthal, Ostroff & Markham, 1995-2001. Partner, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2018. Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP, 2018 - present.

Member: San Diego County, Illinois State and American Bar Associations; State Bar of California.

Educated: University of Wisconsin (B.A., 1970); Loyola University of Chicago (J.D., 1973);

Summer Intern (1971) with Harvard Voluntary Defenders

Kyle R. Nordrehaug

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation

Admitted: 1999, California

Biography: Associate, Blumenthal, Ostroff & Markham, 1999-2001. Associate, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Member: State Bar of California, Ninth Circuit Court of Appeals, Third Circuit Court of Appeals

Educated: University of California at Berkeley (B.A., 1994); University of San Diego School of Law (J.D. 1999)

Awards: Top Labor & Employment Attorney 2016; Top Appellate Reversal - Daily Journal 2015; Super Lawyer 2015-2018

Aparajit Bhowmik

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2006, California

Educated: University of California at San Diego (B.A., 2002); University of San Diego School of Law (J.D. 2006)

Biography: Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Awards: Rising Star 2015

Nicholas J. De Blouw

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2011, California

Educated: Wayne State University (B.A. 2008); California Western School of Law (J.D. 2011)

Piya Mukherjee

Associate Attorney

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2010, California

Educated: University of California, San Diego (B.S. 2006); University of Southern California, Gould School of Law (J.D. 2010)

Victoria Rivapalacio

Associate Attorney

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2011, California

Educated: University of California at San Diego (B.A., 2003); George Washington University Law School (J.D. 2010)

Ricardo Ehmann

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2018, California; 2004, Nevada

Educated: University of California, San Diego (B.A. 1998); Loyola Law School (J.D. 2001)

Jeffrey S. Herman

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2011, California; 2016 Arizona

Educated: University of Michigan (B.A. 2008); California Western School of Law (J.D. 2011)

Charlotte James

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

Educated: San Diego State University; California Western School of Law

Christine Levu

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2012, California

Educated: University of California, Irvine; California Western School of Law

Andrew Ronan

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

Educated: Arizona State University; University of San Diego School of Law

Scott Blumenthal

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, New Mexico

Educated: University of Southern California; California Western School of Law

REPORTED CASES

Sakkab v. Luxottica Retail N. Am., Inc., 803 F.3d 425 (9th Cir. 2015) (The panel reversed the district court's order granting Luxottica Retail North America, Inc.'s motion to compel arbitration of claims and dismissing plaintiff's first amended complaint, in a putative class action raising class employment-related claims and a non-class representative claim for civil penalties under the Private Attorney General Act.);

Securitas Security Services USA, Inc. v. Superior Court, 234 Cal. App. 4th 1109 (Cal. Feb. 27, 2015) (Court of Appeal concluded the trial court correctly ruled that *Iskanian* rendered the PAGA waiver within the parties' dispute resolution agreement unenforceable. However, the Court of Appeal then ruled the trial court erred by failing to invalidate the non-severable class action waiver from the agreement and remanded the entire complaint, including class action and PAGA claims, be litigated in the Superior Court);

Sussex v. United States Dist. Court for the Dist. of Nev., 781 F.3d 1065 (9th Cir. 2015) (The panel determined that the district court clearly erred in holding that its decision to intervene mid-arbitration was justified under *Aerojet-General*. Specifically, the panel held that the district court erred in predicting that an award issued by the arbitrator would likely be vacated because of his "evident partiality" under 9 U.S.C. § 10(a)(2).);

Provost v. YourMechanic, Inc., 2020 Cal. App. Lexis 955 (Oct. 15, 2020) (Court of Appeals affirmed denial of arbitration of PAGA claim, and held in a case of first impression, that there was no additional standing rules for PAGA claim brought by independent contractor);

In re Tobacco Cases II, 41 Cal. 4th 1257 (2007); Washington Mutual Bank v. Superior Court, 24 Cal. 4th 906 (2001); Rocker v. KPMG LLP, 148 P.3d 703; 122 Nev. 1185 (2006); PCO, Inc. v. Christensen, Miller, Fink, Jacobs, Glaser, Weil & Shapiro, LLP, 150 Cal. App. 4th 384 (2007); Hall v. County of Los Angeles, 148 Cal. App. 4th 318 (2007); Coshov v. City of Escondido, 132 Cal. App. 4th 687 (2005); Daniels v. Philip Morris, 18 F.Supp 2d 1110 (S.D. Cal.1998); Gibson v. World Savings & Loan Asso., 103 Cal. App. 4th 1291 (2003); Jordan v. Department of Motor Vehicles, 75 Cal. App. 4th 445 (1999); Jordan v. Department of Motor Vehicles, 100 Cal.App. 4th 431 (2002); Norwest Mortgage, Inc. v. Superior Court, 72 Cal.App.4th 214 (1999); Hildago v. Diversified Transp. Sya, 1998 U.S. App. LEXIS 3207 (9th Cir. 1998); Kensington Capital Mgal. v. Oakley, Inc., 1999 U.S. Dist LEXIS 385; Fed.Sec.L.Rep. (CCH) P90,411 (1999 C.D. Cal.); Lister v. Oakley, Inc., 1999 U.S. Dist. LEXIS 384; Fed. Sec. L. Rep. (CCH) P90,409 (C.D. Cal. 1999); Olszewski v. Scripps Health, 30 Cal. 4th 798 (2003); Steroid Hormone Product Cases, 181 Cal. App. 4th 145 (2010); Owen v. Macy's, Inc., 175 Cal. App. 4th 462 (2009); Taiheiyo Cement Corp. v. Superior Court, 117 Cal. App. 4th 380 (2004); Taiheiyo Cement Corp. v. Superior Court, 105 Cal.App. 4th 398 (2003); McMeans v. Scripps Health, Inc., 100 Cal. App. 4th 507 (2002); Ramos v. Countrywide Home Loans, 82 Cal.App. 4th 615 (2000); Tevssier v. City of San Diego, 81 Cal.App. 4th 685 (2000); Washington Mutual Bank v. Superior Court, 70 Cal. App. 4th 299 (1999); Silvas v. E*Trade Mortg. Corp., 514 F.3d 1001 (9th Cir. 2008); Silvas v. E*Trade Mortg. Corp., 421 F. Supp. 2d 1315 (S.D. Cal. 2006); McPhail v. First Command Fin. Planning, Inc., 2009 U.S. Dist. LEXIS 26544 (S.D. Cal. 2009); McPhail v. First Command Fin. Planning, Inc., 251 F.R.D. 514 (S.D. Cal. 2008); McPhail v. First Command Fin. Planning, Inc., 247 F.R.D. 598 (S.D. Cal. 2007); Barcia v. Contain-A-Way, Inc., 2009 U.S. Dist. LEXIS 17118 (S.D. Cal. 2009); Barcia v. Contain-A-Way, Inc., 2008 U.S. Dist. LEXIS 27365 (S.D. Cal. 2008); Wise v. Cubic Def. Applications, Inc., 2009 U.S. Dist. LEXIS 11225 (S.D. Cal. 2009); Gabisan v. Pelican Prods., 2009 U.S. Dist. LEXIS 1391

(S.D. Cal. 2009); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin. Nat'l Marine Fisheries Serv., 630 F. Supp. 2d 1222 (S.D. Cal. 2009); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin. Nat'l Marine Fisheries Serv., 2008 U.S. Dist. LEXIS 102380 (S.D. Cal. 2008); Louie v. Kaiser Found. Health Plan, Inc., 2008 U.S. Dist. LEXIS 78314 (S.D. Cal. 2008); Weltman v. Ortho Mattress, Inc., 2010 U.S. Dist. LEXIS 20521 (S.D. Cal. 2010); Weltman v. Ortho Mattress, Inc., 2008 U.S. Dist. LEXIS 60344 (S.D. Cal. 2008); Curry v. CTB McGraw-Hill, LLC, 2006 U.S. Dist. LEXIS 5920; 97 A.F.T.R.2d (RIA) 1888; 37 Employee Benefits Cas. (BNA) 2390 (N.D. Cal. 2006); Reynov v. ADP Claims Servs. Group, 2006 U.S. Dist. LEXIS 94332 (N.D. Cal. 2006); Kennedy v. Natural Balance Pet Foods, Inc., 2010 U.S. App. LEXIS 248 (9th Cir. 2010); Kennedy v. Natural Balance Pet Foods, Inc., 2008 U.S. Dist. LEXIS 38889 (S.D. Cal. 2008); Kennedy v. Natural Balance Pet Foods, Inc., 2007 U.S. Dist. LEXIS 57766 (S.D. Cal. 2007); Sussex v. Turnberry/MGM Grand Towers, LLC, 2009 U.S. Dist. LEXIS 29503 (D. Nev. 2009); Picus v. Wal-Mart Stores, Inc., 256 F.R.D. 651 (D. Nev. 2009); Tull v. Stewart Title of Cal., Inc., 2009 U.S. Dist. LEXIS 14171 (S.D. Cal. 2009); Keshishzadeh v. Gallagher, 2010 U.S. Dist. LEXIS 46805 (S.D. Cal. 2010); Keshishzadeh v. Arthur J. Gallagher Serv. Co., 2010 U.S. Dist. Lexis 116380 (S.D. Cal. 2010); In re Pet Food Prods. Liab. Litig., MDL Docket No. 1850 (All Cases), 2008 U.S. Dist. LEXIS 94603 (D.N.J. 2008); In re Pet Food Prods. Liab. Litig., 629 F.3d 333 (3rd Cir. 2010); Puentes v. Wells Fargo Home Mortgage, Inc., 160 Cal. App. 4th 638 (2008); Rezec v. Sony Pictures Entertainment, Inc., 116 Cal. App. 4th 135 (2004); Badillo v. Am. Tobacco Co., 202 F.R.D. 261 (D. Nev. 2001); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin., 2010 U.S. App. Lexis 23025 (9th Cir. 2010); Dirienzo v. Dunbar Armored, Inc., 2011 U.S. Dist. Lexis 36650 (S.D. Cal. 2011); Rix v. Lockheed Martin Corp., 2011 U.S. Dist Lexis 25422 (S.D. Cal. 2011); Weitzke v. Costar Realty Info., Inc., 2011 U.S. Dist Lexis 20605 (S.D. Cal. 2011); Goodman v. Platinum Condo. Dev., LLC, 2011 U.S. Dist. LEXIS 36044 (D. Nev. 2011); Sussex v. Turnberry/MGM Grand Towers, LLC, 2011 U.S. Dist. LEXIS 14502 (D. Nev. 2011); Smith v. Kaiser Foundation Hospitals, Inc., 2010 U.S. Dist. Lexis 117869 (S.D. Cal. 2010); Dobrosky v. Arthur J. Gallagher Serv. Co., LLC, No. EDCV 13-0646 JGB (SPx), 2014 U.S. Dist. LEXIS 106345 (C.D. Cal. July 30, 2014); Metrow v. Liberty Mut. Managed Care LLC - Class Certification Granted, Metrow v. Liberty Mut. Managed Care LLC, No. EDCV 16-1133 JGB (KKx), 2017 U.S. Dist. LEXIS 73656 (C.D. Cal. May 1, 2017); Nelson v. Avon Products, Inc., Class Certification Granted, U.S. District Court for The Northern District of California, Case No. 13-cv-02276-BLF, 2015 U.S. Dist. LEXIS 51104 (N.D. Cal. Apr. 17, 2015); Orozco v. Illinois Tool Works Inc., Class Certification Granted, 2017 U.S. Dist. LEXIS 23179 (E.D. Cal. Feb. 16, 2017); Rieve v. Coventry Health Care, Summary Judgment *Sua Sponte* Granted for Plaintiff, Rieve v. Coventry Health Care, Inc., 870 F. Supp. 2d 856 (C.D. Cal. 2012)

CLASS ACTION & REPRESENTATIVE CASES

4G Wireless Wage Cases, Orange County Superior Court, JCCP No. 4736; Classic Party Rentals Wage & Hour Cases, Los Angeles Superior Court, Case No. JCCP No. 4672; Abu-Arafeh v. Norco Delivery Service, Inc., San Francisco County Superior Court, Case No. CGC-14-540601; Aburto v. Verizon, U.S. District Court, Southern District California, Case No. 11-cv-0088; Adkins v. Washington Mutual Bank, Class Certification Granted, San Diego County Superior Court, Case No. GIC819546; Agah v. CompUSA, U.S. District Court, Central District of California, Case No. SA CV05-1087 DOC (Anx); Akers v. The San Diego Union Tribune, San Diego County Superior Court, Case No 37-2010-00088571; Altman v. SolarCity Corporation, San Diego County Superior Court, Case No. 37-2014-00023450-CU-OE-CTL; Aquino v. Macy's West Stores, Orange County Superior Court, Case No. 30-2010-00395420; Baker v. Advanced Disability Management, Inc., Sacramento County Superior Court, Case No. 34-2014-00160711; Barcia v. Contain-A-Way, U.S. District Court, Southern District California, Case No. 07 cv 0938; Bates v. Verengo, Inc., Orange County Superior Court, Case No. 30-2012-00619985-CU-OE-CXC; Battle v. Charming Charlie Inc., San Diego

County Superior Court, Case No. 37-2014-00005608; Behar v. Union Bank, Orange County Superior Court, Case No. 30-2009-00317275; Bell v. John Stweart Company, Alameda County Superior Court, Case No. RG14728792; Bennett v. Custom Built Personal Training Monterey County Superior Court, Case No. M127596; Bermant v. Bank of America, Investment Services, Inc., Los Angeles Superior Court, Civil Action No. BC342505; Bethley v. Raytheon Company, United States District Court, Central District of California, Case No. SACV10-01741; Betorina v. Randstad US, L.P., U.S. District Court Northern District of California, Case No. 3:15-cv-03646-MEJ; Beverage v. Edcoa Inc., Sacramento County Superior Court, Case No. 2013-00138279; Bova v. Washington Mutual Bank / JP Morgan Chase, U.S. District Court, Southern District California, Case No. 07-cv-2410; Bowden v. Sunset Parking Services, LLC & LAZ Parking California, LLC - Settled San Diego County Superior Court, Case No. 37-2012-00101751-CU-OE-CTL; Briseno v. American Savings Bank, Class Certification Granted, Orange County Superior Court, Case No. 774773; Brueske v. Welk Resorts, San Diego Superior Court, Case No 37-2010-00086460; Bueche v. Fidelity National Management Services, U.S. District Court, Eastern District of California, Case No. 13-cv-01114; Bunch v. Pinnacle Travel Services, LLC, Los Angeles County Superior Court, Case No. BC552048; Butler v. Stericycle, Inc & Appletree Answering Services of California, Inc., Sacramento County Superior Court, Case No. 34-2015-00180282; Cabral v. Creative Communication Tech., Class Certification Granted, Los Angeles Superior Court, Case No. BC402239; Cardoza v. Wal-Mart Associates, Inc., U.S. District Court Northern District of California, Case No. 4:15-cv-01634-DMR; Castro v. Vivint Solar, Inc., San Diego County Superior Court, Case No. 37-2014-00031385-CU-OE-CTL; Cavazos v. Heartland Automotive Services, Inc., Riverside County Superior Court, Case No. PSC 1401759; Cohen v. Bosch Tool, San Diego Superior Court, Case No. GIC 853562; Comstock v. Washington Mutual Bank - Class Certification Granted, San Diego County Superior Court, Case No. GIC820803; Conley v. Norwest, San Diego County Superior Court, Case No. N73741; Connell v. Sun Microsystems, Alameda Superior Court, Case No. RG06252310; Corrente v. Luxe Valet, Inc., San Francisco County Superior Court, Case No. CGC-15-545961; Cruz v. Redfin Corporation, U.S. District Court Northern District of California, Case No. 3:14-cv-05234-THE; Culley v. Lincare Inc. & Alpha Respiratory Inc., U.S. District Court eastern District of California, Case No. 2:15-cv-00081-GEB-CMK; Cunningham v. Leslie's Poolmart, Inc., U.S. District Court, Central District of California, Case No. 13-cv-02122-CAS; Curry v. California Testing Bureau/McGraw Hill, U.S. District Court, Northern District of California, Case No. C-05-4003 JW; Daniels, et al. v. Philip Morris,(In Re Tobacco Cases II) – Class Certification Granted, San Diego Superior Court, Case No. JCCP 4042; Davis v. Genex Holdings Inc., Santa Clara County Superior Court, Case No. 1-13-cv-240830; Davis v. Clear Connection, LLC, San Diego County Superior Court, Case No. 37-2014-00035173-CU-OE-CTL; Day v. WDC Exploration, Orange County Superior Court, Case No. 30-2010-00433770; Dedrick v. Hollandia Diary, San Diego County Superior Court, Case No. 37-2014-00004311-Cu-OE-CTL; Delmare v. Sungard Higher Education - Settled U.S. District Court, Southern District of California, Case No. 07-cv-1801; Del Rio v. Tumi Stores, Inc., San Diego County Superior Court, Case No. 37-2015-00022008-CU-OE-CTL; Dewane v. Prudential, U.S. District Court, Central District of California, Case No. SA CV 05-1031; Diesel v. Wells Fargo Bank, Orange County Superior Court, Case No. 30-2011-00441368; Dirienzo v. Dunbar Armored, U.S. District Court, Southern District of California, Case No. 09-cv-2745; Dobrosky v. Arthur J. Gallagher Service Company, LLC, Class certification Granted, No. EDCV 13-0646 JGB (Spx); Dodds v. Zaven Tootikian, Los Angeles County Superior Court, Case No. BC494402; Drumheller v. Radioshack Corporation, United States District Court, Central District of California, Case No. SACV11-355; Enger v. Kaiser Foundation Health Plan, U.S. District Court, Southern District of California, Case No. 09-cv-1670; Escobar v. Silicon Valley Security & Patrol, Inc., Santa Clara County Superior Court, Case No. 1-14-cv272514; Fierro v. Chase Manhattan - Class Certification Granted, Settled San Diego Superior Court, Case No. GIN033490; Figueroa v. Circle K Stores, Inc., San Diego County Superior Court, Case No. 37-2012-00101193-CU-OE-CTL; Finch v. Lamps Plus, (Lamps Plus Credit Transaction Cases), San Diego Superior Court, Case No. JCCP 4532; Fletcher v. Verizon, U.S. District Court, Southern

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Navajo Express, Inc. – San Bernardino County Superior Court, Case No. CIVDS1613846; Lara v. Commercial Protective Service, Inc. – Los Angeles County Superior Court, Case No. BC648921; Picos v. Culinary of California, Inc. – San Diego County Superior Court, Case No. JCCP 4892; Samaniego v. A&I Transport, Inc. – Santa Cruz County Superior Court, Case No. 16CV01894; Bailey v. Romanoff Floor Covering, Inc. – U.S. District Court, Eastern District of California, Case No. 17-CV-00685-TLN-CMK; Aguirre v. Bitech, Inc. – Sacramento County Superior Court, Case No. 34-2016-002022; Phillips v. DI Overnite LLC – San Diego County Superior Court, Case No. 37-2016-00016800-CU-OE-CTL; Jacob v. Pride Transport, Inc. – Santa Cruz County Superior Court, Case No. 16CV1337; Bennett v. Heartland Express, Inc. of Iowa – San Diego County Superior Court, Case No. 37-2016-00015056-CU-OE-CTL; Stapf v. Mercer Health & Benefits Administration LLC – Los Angeles County Superior Court, Case No. BC643007; Armstrong v. Ruan Transport Corporation – San Bernardino County Superior Court, Case No. CIVDS1605897; Geiger v. Floyd's 99-California LLC – Orange County Superior Court, Case No. 30-2016-00874943-CU-OE-CXC; Mondrian v. Trius Trucking, Inc. – Fresno County Superior Court, Case No. 16CECG01501; Johnson v. Fedex Office and Print Services, Inc. – Alameda County Superior Court, Case No. RG17856291; Rios v. Pacific Western Bank – San Diego County Superior Court, Case No. 37-2016-00038083; Sanders v. Old Dominion Freight Lines, Inc. – San Diego County Superior Court, Case No. 37-2016-00030725-CU-OE-CTL; Taylor v. Gardner Trucking, Inc. – San Bernardino County Superior Court, Case No. CIVDS1614280; Couture v. Wal-Mart Associates, Inc. – U.S. District Court, Eastern District of California, case No. 16-CV-02202-VC; Bertuol v. AHMC Anaheim Regional Medical Center LP – Orange County Superior Court, Case No. 30-2017-00899024-CO-OE-CXC; Espinoza v. Prime Communications of California, LLC – San Mateo County Superior Court, Case No. 16CIV01563; Archuletta v. Tidy Services, Inc. – Orange County Superior court, Case No. 30-2016-008611892-CU-OE-CXC; Puccini v. Earthbound Farm, LLC – Santa Clara County Superior Court, Case No. 17CV308643; Vikram v. First Student Management, LLC – U.S. District Court, Northern District of California, Case No. 17-CV-04656-KAW; Blair v. Ashley Distribution Services, LTD. – U.S. District Court, Central District of California, Case No. 17-CV-01427-JAK-SP; Richardson v. Service Staffing, LLC – Orange County Superior Court, Case No. 30-2017-00899039-CU-OE-CXC; Coffin v. Certified Freight Logistics, Inc. – San Diego County Superior Court, Case No. 37-2016-00036523-CU-OE-CTL; Encarnacion v. S.A.S. Services Group, Inc. – San Diego County Superior Court, Case No. 37-2017-00026726-CU-OE-CTL; Vasquez v. Golden State Overnight Delivery Service, Inc. – Alameda County Superior Court, Case No. RG17862924; Karr v. Tristar Managed Care, Inc. – Contra Costa Superior Court, case No. MSC17-00650; Gouveia v. Central Cal Transportation – San Joaquin County Superior Court, Case No. STK-CV-UOE-2017-0001765; Miranda v. Genex Services, LLC – U.S. District Court, Northern District of California, Case No. 17-CV-01438-JD; Spears v. Health Net of California, Inc. – Sacramento County Superior Court, Case No. 34-2017-00210560; Martinez v. Geil Enterprises, Inc. – Fresno County Superior Court, Case No. 17CECG01879; McComack v. Marriott Ownership Resorts, Inc. – U.S. District Court, Southern District of California, Case No. 17CV1663 BEN WVG; Velasco v. Lemonade Restaurant Group, LLC – Los Angeles County Superior Court, Case No. BC672235; Smith v. Personnel Services, Inc. – U.S. District Court, Northern District of California, Case NO. 17-CV-03594-SK; Gabriel v. Kuni SDA, LLC – San Diego County Superior Court, Case No. 37-2017-000251191-CU-OE-CTL; Miller v. Mattress Firm, Inc. – Santa Clara County Superior Court, Case No. 17CV313148; Provost v. Yourmechanic, Inc. – San Diego County Superior Court, Case No. 37-2017-00024056-CU-OE-CTL; Zirpolo v. UAG Stevens Creek II, Inc. – Santa Clara County Superior Court, Case No. 17CV313457; Salazar v. Aids Healthcare Foundation – San Diego County Superior Court, Case No. 37-2017-00033482-CU-OE-CTL; Knipe v. Amazon.com, Inc. – San Diego County Superior Court, Case No. 37-2017-00029426-CU-OE-CTL; Erwin v. Caremeridian, LLC – Fresno County Superior Court, Case No. 17CECG03048; Davis v. Cox Communications California, LLC – U.S. District Court, Southern District of California, Case No. 16-CV-00989-BAS-BLM; Lara v. RMI International, Inc. – Los Angeles County Superior Court, Case No. BC597695; Harper v. C.R. England, Inc. – U.S. District Court, Utah Central

Division, Case No. 16-CV-00906-DB; Mrazik v. C.H. Robinson Company – U.S. District Court, Central District of California, Case No. 12-CV-02067-CAS-PLA; Horn v. Rise Medical Staffing, LLC – U.S. District Court, Eastern District of California, Case No. 2:17-cv-01967-MCE-KJN; Pasallo v. GSG Protective Services CA Inc. – San Diego Superior Court, Case No. 37-2018-00037611-CU-OE-CTL; Smith v. Pacific Personnel Services, Inc. – U.S. District Court, Northern District of California, Case No. 17-cv-03594-SK; Terrado v. Accredited Debt Relief, LLC – San Diego Superior Court, Case No. 37-2018-00014181-CU-OE-CTL; Escobedo v. Pacific Western Bank – Los Angeles Superior Court, Case No. BC682686; Wade v. Automobile Club of Southern California – Orange County Superior Court, Case No. 30-2017-00960268-CU-OE-CXC; Montano v. American Automobile Association of Northern California – Contra Costa County Superior Court, Case No. CIVMSC18-01539; Perez v. Summit Interconnect, Inc. – Orange County Superior Court, Case No. 30-2018-00995403-CU-OE-CXC; Wolleson v. Gosch Imports, Inc. – Riverside County Superior Court, Case No. RIC170356; Banuelos v. Ortho Mattress, Inc. – Orange County Superior Court, Case No. 30-2020-01161304-CU-OE-CXC; Castellanos v. Miller Automotive Group, Inc. – Los Angeles County Superior Court, Case No. BC699211; Tressler v. Spoonful Management, LLC – Los Angeles County Superior Court, Case No. BC71940; Delph v. Employee Retention Services, LLC – San Diego County Superior Court, Case No. 37-2018-00007885; Romero v. May Trucking Company – U.S. District Court, Central District of California, Case No. 5:17-cv-02166-JGB-SHK; Miranda v. Genex Services, LLC – San Bernardino County Superior Court, Case No. CIVDS1700779; Moore v. Zirx Transportation Services, Inc. – Los Angeles County Superior Court, Case No. CGC-18-566655; Sottile v. Motion Recruitment Partners – Santa Clara County Superior Court, Case No. 18CV321677; Shahbazian v. Fast Auto Loans, Inc. – U.S. District Court, Central District of California, Case No. 2:18-cv-03076-ODW-KS; Salazar v. Johnson & Johnson Consumer Inc. – Los Angeles County Superior Court, Case No. BC702468; Conti v. L’Oreal USA S/D, Inc. – U.S. District Court, Eastern District of California, Fresno, Case No. 1:19-CV-00769-LJO-SKO; Mercado v. Security Industry Specialists, Inc. – Santa Clara County Superior Court, Case No. 17CV320059; Vikili v. Dignity Health – San Francisco County Superior Court, Case No. CGC-18-569456; Bagby v. Swissport SA, LLC – Los Angeles County Superior Court, Case No. BC691058; Henry v. Motion Entertainment Group, LLC – San Francisco County Superior Court, Case No. CGC18565643; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Lanuza v. AccentCare, Inc. – San Francisco County Superior Court, Case No. CGC-18-565521; Thomas v. Easy Driving School, LLC – San Diego County Superior Court, Case No. 37-2018-00047639-CU-OE-CTL; Erickson v. Erickson – Contra Costa County Superior Court, Case No. MSC18-00307; Martin v. Menzies Aviation (USA) Inc. – San Francisco County Superior Court, Case No. CGC-18-566072; Mortimer v. Healthsouth Bakersfield Rehabilitation Hospital, LLC – Kern County Superior Court, Case No. BCV-18-102761; Alcaraz v. Red Lion Hotels Corporation – San Francisco County Superior Court, Case No. CGC-18-570310; Calhoun v. Total Transportation and Distribution, Inc. – San Diego County Superior Court, Case No. 37-2018-00058681-CU-OE-CTL; Rataul v. Overton Security Services, Inc. – Alameda County Superior Court, Case No. RG18891882; Beltran v. Compass Bank – San Diego County Superior Court, Case No. 37-2019-00024475-CU-OE-CTL; Kirshner v. Touchstone Golf, LLC – San Diego County Superior Court, Case No. 37-2018-00028865-CU-OE-CTL; Pizarro v. The Home Depot, Inc. – U.S. District Court for the Northern District of Georgia-Atlanta Division; Hatanaka v. Restore Rehabilitation, LLC – San Diego County Superior Court, Case No. 37-2018-00034780-CU-OE-CTL; Faria v. Carriage Funeral Holdings, Inc. – Contra Costa County Superior Court, Case No. MSC18-00606; Ontiveros v. Baker Concrete Construction, Inc. – Santa Clara County Superior Court, Case No. 18CV328679; Morales v. Redlands Automotive Services, Inc. – San Bernardino County Superior Court, Case No. CIVDS1807525; Ramirez v. Carefusion Resources, LLC – U.S. District Court, Southern District of California; Amster v. Starbucks Corporation – San Bernardino Superior Court, Case No. CIVDS1922016; Kutzman v. Derrel’s Mini Storage, Inc. – U.S. District, Eastern District of California, Case No. 1:18-cv-00755-AWI-JLT; Marks v. Universal Propulsion Company, Inc. – Solano County Superior Court, Case No. FCS051608; Martinez v. Geil Enterprises,

Inc. – Fresno County Superior Court, Case No. 17CECG01480; Teniente v. Cirrus Asset Management, Inc. – Los Angeles County Superior Court, Case No. 20STCV16302; Blackshear v. California Fine Wine & Spirits LLC – Sacramento County Superior Court, Case No. 34-2018-00245842; Warnick v. Golden Gate America West LLC – Los Angeles County Superior Court, Case No. BC714176; Bennett v. Dnata Aviation USA, Inc. – San Francisco County Superior Court, Case No. CGC-18-566911; George v. PF Stockton Fitness LLC – Sacramento County Superior Court, Case No. 34-2019-00261113-CU-OE-GDS; Oshana v. Farmers and Merchants Bank of Central California – Stanislaus County Superior Court, Case No. CV-19-003427; Vasquez v. Packaging Corporation of America – U.S. District Court, California Central District, Case No. 2:19-cv-01935-PSG-PLA; Palomino v. Zara USA Inc. – Orange County Superior Court, Case No. 30-2018-00992682-CU-OE-CXC; Simmons v. Joe & The Juice LA, LLC – San Francisco County Superior Court; Pacia v. CIM Group, L.P. – Los Angeles County Superior Court, Case No. BC709666; Flores v. Plastic Express – Los Angeles County Superior Court, Case No. BC71971; Madera v. William Warren Properties, Inc. – Orange County Superior Court, Case No. 30-2019-01055704-CU-OE-CXC; Hernandez v. Quality Custom Distribution – Orange County Superior Court, Case No. 30-2018-01010611-CU-OE-CXC; Arango v. Schlumberger Technology Corporation – Orange County Superior Court, Case No. 30-2019-01056839-CU-OE-CXC; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Ramirez v. JEH Enterprises, Inc. – San Francisco County Superior Court, Case No. CGC-19-574691; Sullen v. First Service Residential California, LLC – San Francisco County Superior Court, Case No. CGC-19-575131; Valentino v. East Bay Tire Co. – Solano County Superior Court, Case No. FCS053067; Murphy v. Rockler Retail Group, Inc. – Sacramento Superior Court, Case No. 34-2019-00251220; Shahbazian v. Onewest Bank – Los Angeles County Superior Court, Case No. 19STCV23722; Bruemmer v. Tempur Retail Stores LLC – Marin County Superior Court, Case No. CIV1803646; Antonios v. Interface Rehab, Inc. – Orange County Superior, Case No. 30-2019-01067547-CU-OE-CXC; Tavallodi v. DC Auto, Inc. – San Bernardino, Case No. CIVDS1833598; Miranda v. The Lloyd Pest Control Co. – San Diego County Superior Court, Case No. 37-2018-00052510-CU-OE-CTL; Soenardi v. Magnussen Imports, Inc. – Santa Clara County Superior Court, Case No. 18CV340003; Thai v. Team Industrial Services, Inc. – Los Angeles County Superior Court, Case No. 19STCV21953; Castillo v. A.J. Kirkwood & Associates, Inc. – Los Angeles County Superior Court, Case No. 19STCV04435; Moss v. Jabil Inc. – Alameda County Superior Court, Case No. HG20050536; Billosillo, Jr. v. Crown Energy Services, Inc. – San Diego County Superior Court, Case No. 37-2018-00058254-CU-OE-CTL; Tarkington v. Freetime, Inc. – San Diego County Superior Court, Case No. 37-2019-00011473-CU-OE-CTL; McIntyre v. J.J.R. Enterprises, Inc. – Sacramento County Superior Court, Case No. 34-2019-00251220; Bucur v. Pharmaca Integrative Pharmacy, Inc. – San Diego County Superior Court, Case No. 37-2019-00009409-CU-OE-CTL; Batin v. McGee Air Services, Inc. – Santa Clara County Superior Court, Case No. 19CV347733; Terry v. McGee Air Services, Inc. – King County Superior Court of Washington, Case No. 19-2-3321-5 KNT; Weiss v. Niznik Behavioral Health Resources, Inc. – San Diego County Superior Court, Case No. 37-2019-00039441-CU-OE-CTL; Cavada v. Inter-Continental Hotels Group, Inc. – U.S. District Court, Southern District of California, Case No. 3:19-cv-01675-GPC-AHG; Lesevic v. Spectraforce Technologies, Inc. – U.S. District Court, Northern District of California, Case No. 5:19-cv-03126-LHK; Mutchler v. Circle K Stores, Inc. – San Diego County Superior Court, Case No. 37-2020-00016331-CU-OE-CTL; Azima v. CSI Medical Group – Santa Clara County Superior Court, Case No. 19CV345450; Porras v. Baypointe Enterprises, LLC – Los Angeles County Superior Court, Case No. 19STCV31015; Mitchell v. Mack Trucking, Inc. – San Bernardino County Superior Court, Case No. CIVDS1928334; Watts v. T.R.L. Systems, Incorporated – Orange County Superior Court, Case No. 30-2019-01102457-CU-OE-CXC; Price v. DMSD Restaurants Inc. – San Diego County Superior Court, Case No. 37-2019-00024062-CU-OE-CTL; Jacobs v. Nortek Security & Control LLC – San Diego County Superior Court, Case No. 37-2019-0019735-CU-OE-CTL; Gonzalez v. Hub International Midwest – San Bernardino County Superior Court, Case No. CIVDS1900463; Cisneros v. Bluepearl California, Inc. – San Mateo Superior Court, Case No. 19-

CIV-05707; Garcia v. Gallagher Basset Services – San Bernardino Superior Court, Case No. CIVDS2004140; Callow v. Adventist Health System/West – Placer County Superior Court, Case No. SCV0043607; Dominguez v. Kimco Facility Services, LLC – Los Angeles County Superior Court, Case No. 19STCV37592; Searles v. Robert Heath Trucking, Inc. – Los Angeles County Superior Court, Case No. 19STCY30808; Rangel v. Pioneer Hi-Bred international, Inc. – Yolo County Superior Court, Case No. CV-19-1797; Ivon v. Sinclair Television of California, Humboldt County Superior Court, Case No. DR190699; Williams v. Henkels & McCoy, Inc. – San Bernardino County Superior Court, Case No. CIVDS2003888; Cano v. Larry Green Chrysler Jeep Dodge, Inc. – Riverside County Superior Court, Case No. BLC1900184; Lopez v. Cepheid – Santa Clara County Superior Court, Case No. 19CV358827; Hernandez v. Quick Dispense, Inc. – Los Angeles County Superior Court, Case No. 19STCV29405; Lopez v. Lacoste USA, Inc. – San Bernardino County Superior Court, Case No. CIVDS1914626; Duhe v. Hospital Couriers Nevada, LLC – Contra Costa County Superior Court, Case No. MSC19-01377; Law v. Sequoia Equities, Incorporated – Contra Costa Superior Court, Case No. C19-01925; Dvorak v. Rockwell Collins, Inc. – San Diego County Superior Court, Case No. 37-2019-00064397-CU-OE-CTL; Noguera v. Metal Container Corporation – Riverside County Superior Court, Case No. RIC2003235; Leon v. Miller Event Management, Inc. – San Luis Obispo Superior Court, Case No. 19CV-0435; Leon v. Miller Event Management, Inc. – San Luis Obispo County Superior Court, Case No. 19CV-0435, Camacho-Bias v. Serve U Brands Inc. – Butte County Superior Court, Case No. 20CV00603; La Pietra v. Entertainment Partners Services, LLC – Los Angeles County Superior Court, Case No. 19STCV39529; Celis v. Theatre Box - San Diego, LLC – San Diego County Superior Court, Case No. ____; Ignacio v. Laboratory Corporation of America – U.S. District Court, California Central District, Case No. 2:19-cv-06079-AB-RAO; Kovnas v. Cahill Contractors LLC – Alameda County Superior Court, Case No. RG19037852; Hersh v. Mrs. Gooch's Natural Food – Los Angeles County Superior Court, Case No. 19STCV10444; Miller v. The Permanente Medical Group – Alameda County Superior Court, Case No. RG19045904; Vasquez v. Autoalert, LLC – Orange County Superior Court, Case No. 30-2019-01114549-CU-OE-CXC; Cavanaugh v. Morton Golf, LLC – Sacramento County Superior Court, Case No. 34-2019-00270176; Coley v. Monroe Operations, LLC – Alameda County Superior Court, Case No. RG20063188; Ramirez v. Sierra Aluminum Company – U.S. District Court, California Central District Court, Case No. 5:20-cv-00417-JGB-KK; Marrero v. Stat Med, P.C. – Alameda County Superior Court, Case No. HG19043214; Enriquez v. Solari Enterprises, Inc. – Los Angeles County Superior Court, Case No. 20STCV11129; Craig v. Hometown Heart – San Francisco County Superior Court, Case No. CGC-20-582454; Lopez v. Hy0Lang Electric California, Inc. – San Diego County Superior Court, Case No. 37-2020-00012543-CU-OE-CTL; Heuklom v. Clara Medical Group, P.C. – San Francisco County Superior Court, Case No. CGC-20-585918; Dominguez v. Lifesafer of Northern California – Monterey County Superior Court, Case No. 20CV002586; Kiseleva v. Totalmed Staffing Inc. – U.S. District Court, California Northern District, Case No. 5:19-cv-06480; Vires v. Sweetgreen, Inc. – Santa Clara County Superior Court, Case No. 20CV365918; Kim v. Wireless Vision, LLC – San Bernardino County Superior Court, Case No. CIVDS2000074; Senoren v. Air Canada Corporation – Los Angeles County Superior Court, Case No. 20STCV13942; Clark v. Quest Diagnostics Incorporated – San Bernardino County Superior Court, Case No. CIVDS2018707; Green v. Shipt, Inc. – Los Angeles County Superior Court, Case No. 20STCV01001; Respass v. The Scion Group LLC – Sacramento County Superior County, Case No. 34-2020-00285265; Jackson v. Decathlon USA LLC – Alameda County Superior Court, Case No. RG2003024; Avacena v. FTG Aerospace Inc. – Los Angeles County Superior Court, Case No. 20STCV28767; Perez v. Butler America, LLC – Los Angeles County Superior Court, Case No. 20STCV20218; Christensen v. Carter's Retail, Inc. – Orange County Superior Court, Case No. 30-2020-01138792-CU-OE-CXC; Astudillo v. Torrance Health Association, Inc. – Los Angeles County Superior Court, Case No. 20STCV18424; Hansen v. Holiday AI Management Sub LLC – Contra Costa County Superior Court, Case No. CIVMSC20-00779; Almahdi v. Vitamin Shoppe Industries Inc – Santa Clara County Superior Court, Case No. 20CV365150; Krisinda v. Loyal Source Government Services LLC – U.S. District Court, California

Southern District, Case No. 3:20-cv-879-LAB-NLS; Ettedgui v. WB Studio Enterprises Inc – U.S. District Court, California Central District, Case No. 2:20-CV-08053-MCS (MAAx); Fernandez v. Nuvision Federal Credit Union – Orange County Superior Court, Case No. 30-2020-01161691-CU-OE-CJC; Aviles v. UPS Supply Chain Solutions, Inc. – Riverside County Superior Court, Case No. RIC2000727; Alcocer v. DSV Solutions, LLC – San Bernardino Superior Court, Case No. CIVDS2010345; Wilson v. Wholesome Harvest Baking, LLC – U.S. District Court, California Northern District, Case No. 4:20-cv-05186-YGR; Gregory v. Verio Healthcare, Inc. – Los Angeles County Superior Court, Case No. 20STCV37254; Rose v. Impact Group, LLC – Orange County Superior Court, Case No. 30-2020-01141107-CU-OE-CXC; Monasterio v. Citibank, N.A. – San Mateo County Superior Court, Case No. 20-CIV-03650; Martinez-Lopez v. Medamerica, Inc. – San Diego County Superior Court, Case No. 37-2020-00034393-CU-OE-CTL; Cox v. PRB Management, LLC – Solano County Superior Court, Case No. FCS055514; Nash v. K. Hovnanian Companies, LLC – Riverside County Superior Court, Case No. RIC2003319; Kyler v. Harbor Freight Tools USA, Inc. – San Diego County Superior Court, Case No. 37-2020-00015828-CU-OE-CTL; Roberts v. Solantic Corporation – Los Angeles County Superior Court, Case No. 20STCV41117; Price v. Mistras Group, Inc. – Los Angeles County Superior Court, Case No. 20STCV22485; Macias v. ABM Electrical & Lighting Solutions, Inc. – San Diego County Superior Court, Case No. 37-2020-00024997-CU-OE-CTL; Basu-Kesselman v. Garuda Labs, Inc. – San Francisco County Superior Court, Case No. CGC-20-585229; Armstrong v. Prometric LLC – Los Angeles County Superior Court, Case No. 20STCV29967; Ashlock v. Advantis Medical Staffing, LLC – San Diego County Superior Court, Case No. 37-2020-00022305-CU-OE-CTL; Wilson v. WXI Global Solutions, LLC – Los Angeles County Superior Court, Case No. 20STCV25007; Gandhale v. Select Rehabilitation, LLC – Monterey County Superior Court, Case No. 20CV002240; Starvoice v. G4S Secure Solutions (USA) Inc. – San Diego County Superior Court, Case No. 37-2020-00029421-CU-OE-CTL; Mbise v. Axlehire, Inc. – Alameda County Superior Court, Case No. RG20067350; Points v. C&J Services, Inc. – Kern County Superior Court, Case No. BCV-20-102483; Marshall v. PHI Air Medical, LLC – Lassen County Superior Court, Case No. 62973; Jauregui v. Cytotec Engineered Materials, Inc. – Orange County Superior Court, Case No. 30-2020-01164932-CU-OE-CXC

EXHIBIT 2

BLUMENTHAL NORDREHAUG

BHOWMIK DE BLOUW LLP
2255 CALLE CLARA
LA JOLLA, CA 92037
(858) 551-1223

JULY 7, 2023

NORMAN RESPASS

RE: SCION GROUP
FILE NUMBER: CA2007.001

ATTORNEY FEES

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
11/05/19	ND	REVIEW AND ANALYZE ORIGINAL INTAKE NOTES. LEGAL RESEARCH REGARDING RELATED LITIGATION IN STATE AND FEDERAL COURT AGAINST DEFENDANT. RESEARCH DEFENDANT'S BUSINESS OPERATIONS.	3.00	850	2,550.00
11/07/19	ND	REVIEW AND ANALYZE EMPLOYMENT FILE FOR LEGAL CLAIMS. CONFERENCE WITH CLIENT TO DISCUSS FACTS FOR COMPLAINT AND PROCESS OF LAWSUIT. ANALYZE 204 LATE PAYMENT OF WAGES CLAIM, RESEARCH REGARDING THE SAME.	4.50	850	3,825.00
11/15/19	ND	DRAFT ORIGINAL COMPLAINT. REVIEW AND ANALYZE FACTS AND LAW.	4.50	850	3,825.00
11/18/19	ND	REVIEW EMAILS AND DOCUMENTS FORM CLIENT REGARDING DISCRIMINATION CLAIMS. LEGAL RESEARCH REGARDING THE SAME AND DFEH RESEARCH.CONFERENCE WITH CLIENT REGARDING STATUS.	3.90	850	3,315.00
11/19/19	ND	REVIEW AND ANALYZE FCRA BACKGROUND CHECK FORMS. LEGAL RESEARCH REGARDING THE SAME.	2.90	850	2,125.00
01/15/20	ND	REVIEW PAY STUBS FOR 226(A) VIOLATIONS. LEGAL RESEARCH REGARDING RECENT COURT DECISIONS FOR 226 CLAIMS.	3.20	850	2,720.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		ANALYZE PAY CODES ON PAYSTUBS AND DISCUSS WITH CLIENT.			
01/28/20	ND	DRAFT COMPLAINT.	4.50	850	3,825.00
02/14/20	NBB	REVIEW COMPLAINT, ANALYZE FIND	2.50	795	1,987.50
02/14/20	ND	REVIEW AND REVISE COMPLAINT. SEND TO CLIENT FOR APPROVAL TO FILE.	2.00	850	1,700.00
02/17/20	JHOM	DRAFT PAGA NOTICE AND LWDA FEE LETTER	1.50	295	442.50
02/17/20	JHOM	FILE PAGA NOTICE AND LWDA FEE LETTER	0.75	295	221.25
02/22/20	ND	REVIEW AND ANALYZE FILE, COMPLAINT AND PAGA NOTICE. DRAFT INTERNAL CASE NOTES MEMO DETAILING CLAIMS AND FACTS.	2.00	850	1,700.00
09/01/20	SB	REVIEW COMPLAINT - ANALYZE FOR FILING	2.60	325	845.00
09/14/20	RE	REVIEW AND ANALYZE EMPLOYMENT FILE DOCUMENTS.	2.25	475	1,068.75
09/14/20	RE	REVIEW DAMAGE ANALYSIS/CASE NOTES	0.50	475	237.50
09/15/20	RE	REVIEW, EDIT AND FINALIZE COMPLAINT; FORWARD TO ND FOR FINAL APPROVAL.	2.75	475	1,306.25
09/15/20	RE	DRAFT SUMMONS AND CIVIL CASE COVER SHEET	0.50	475	237.50
09/16/20	RE	FINALIZE COMPLAINT PACKAGE; FILE IN SAC. SUP. CT.	0.75	475	356.25
09/16/20	NBB	REVIEW COMPLAINT, ANALYZE, FINAL.	2.50	795	1,987.50
09/30/20	RE	REVIEW AND SAVE COURT RETURNED DOCUMENTS; MEMO TO FIRM RE JUDICIAL ASSIGNMENT.	0.50	475	237.50
09/30/20	JH	REVIEW AND ANALYZE COMPLAINT;	0.50	550	275.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		DISCUSS WITH RE			
10/01/20	RE	UPLOAD COMPLAINT TO LWDA WEBSITE; SAVE CONFIRMATION	0.40	475	190.00
10/16/20	RE	PREPARE INITIAL DOCUMENTS FOR SERVICE OF PROCESS ON DEFENDANT; SEND OUT FOR SERVICE VIA KNOX.	0.75	475	356.25
10/22/20	RE	FILE POS OF SUMMONS	0.40	475	190.00
10/28/20	SB	REVIEW COMPLAINT FOR DISCOVERY, ADVISE AJB	2.80	325	910.00
11/17/20	HD	REVIEW CLAIMS AND CASE NOTES. DRAFT PLAINTIFF'S WRITTEN DISCOVERY REQUESTS, INCLUDING REQUEST FOR PRODUCTION, REQUEST FOR ADMISSIONS, SPECIAL INTERROGATORIES, NOTICE OF PMK DEPOSITION, FORM INTERROGATORIES AND PROOF OF SERVICE.	3.00	250	750.00
11/18/20	AR	REVIEW AND OUTLINE FILE FOR STATUS IN ADVANCE OF DRAFTING DISCOVERY.	0.50	475	237.50
11/18/20	HD	REVIEW CLAIMS AND CASE NOTES. DRAFT PLAINTIFF'S WRITTEN DISCOVERY REQUESTS, INCLUDING REQUEST FOR PRODUCTION, REQUEST FOR ADMISSIONS, SPECIAL INTERROGATORIES, NOTICE OF PMK DEPOSITION, FORM INTERROGATORIES, DECLARATION IN SUPPORT OF ADDITIONAL DISCOVERY REQUESTS AND PROOF OF SERVICE.	4.00	250	1,000.00
11/19/20	HD	DRAFT STIPULATION AND PROTECTIVE ORDER.	0.50	250	125.00
11/19/20	HD	DRAFT BELAIRE NOTICE.	0.50	250	125.00
11/20/20	JH	REVIEW COMPLAINT; REVIEW DRAFT BELAIRE NOTICE; DISCUSS WITH HD	0.50	550	275.00
11/20/20	JH	REVIEW AND ANALYZE DEFENDANT'S ANSWER TO COMPLAINT	0.50	550	275.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
11/20/20	AR	REVIEW AND CATEGORIZE CLAIMS FOR DRAFTING DISCOVERY.	0.80	475	380.00
11/20/20	AR	DRAFT PMK DEPOSITION NOTICE.	0.70	475	332.50
11/20/20	AR	RECEIVE AND REVIEW ANSWER.	0.20	475	95.00
11/20/20	AR	BEGIN DRAFTING DISCOVERY PURSUANT TO EXPIRATION OF 20 DAY DEADLINE.	2.20	475	1,045.00
11/20/20	CL	RECEIPT AND REVIEW DEFENDANT'S ANSWER TO COMPLAINT.	0.20	495	99.00
11/20/20	HD	EDIT AND REVISE BELAIRE NOTICE TO INCLUDE FCRA	0.30	250	75.00
11/23/20	AR	REVIEW AND EXTRACT DOCUMENTS TO SERVE AS EXHIBITS FOR DISCOVERY.	0.80	475	380.00
11/23/20	AR	REVISE AND FINALIZE NOTICE OF DEPOSITION.	0.60	475	285.00
11/23/20	AR	DRAFT DECLARATIONS FOR ADDITIONAL RFAS, SROGS.	0.60	475	285.00
11/23/20	AR	REVIEW COMPLAINT AND CASE NOTES, DRAFT FROGS.	0.50	475	237.50
11/23/20	AR	REVIEW COMPLAINT AND CASE NOTES, DRAFT RPDS.	1.50	475	712.50
11/23/20	AR	REVISE AND FINALIZE DRAFT PROTECTIVE ORDER.	0.60	475	285.00
11/24/20	AR	RESEARCH CCP SECTIONS, DRAFT REVISED DECLARATIONS.	0.40	475	190.00
11/24/20	AR	EXTRACT CONSENT FORMS; CORRESPONDENCE WITH JH REGARDING APPLICABILITY.	0.20	475	95.00
11/24/20	AR	RECEIVE AND REVIEW NOTICE OF REMOVAL; CORRESPONDENCE REGARDING THE SAME.	0.50	475	237.50
11/24/20	AR	REVIEW COMPLAINT AND CASE NOTES, DRAFT REQUESTS FOR	1.50	475	712.50

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		PRODUCTION, SET ONE.			
11/24/20	AR	REVIEW COMPLAINT AND CASE NOTES, DRAFT SPECIAL INTERROGATORIES, SET ONE.	1.50	475	712.50
11/24/20	AR	REVIEW COMPLAINT AND CASE NOTES, DRAFT REQUESTS FOR ADMISSIONS, SET ONE.	1.70	475	807.50
11/25/20	JH	REVIEW AND ANALYZE DEFENDANT'S NOTICE OF REMOVAL AND SUPPORTING DOCUMENTS	1.00	550	550.00
11/25/20	JH	REVIEW AND REVISE NOTICE OF APPEARANCE	0.30	550	165.00
11/25/20	CL	FINALIZE NOTICE OF APPEARANCE OF CHRISTINE T. LEVU.	0.10	495	49.50
11/25/20	JH	REVIEW AND ANALYZE 1199.5 DOCS; UPDATE EXHIBIT BOOK	1.20	550	660.00
11/25/20	AR	RECEIVE AND REVIEW SCHEDULING ORDER AND NOTICES BY DEFENDANT; CORRESPONDENCE REGARDING THE SAME.	0.50	475	237.50
11/25/20	AR	REVIEW FRCP REQUIREMENTS, CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING RULE 26F CONFERENCE.	0.30	475	142.50
11/25/20	AR	REVIEW NOTICE OF APPEARANCE; MULTIPLE CORRESPONDENCE REGARDING THE SAME.	0.20	475	95.00
11/30/20	AR	MULTIPLE CORRESPONDENCE WITH OPPOSING COUNSEL AND JH REGARDING RULE 26(F) CONFERENCE, REVIEW CODE FOR REQUIREMENTS.	0.70	475	332.50
12/02/20	AR	REVIEW AND OUTLINE COMPANION CASE RULE 26(F) STATEMENTS IN ADVANCE OF CONFERENCE.	0.60	475	285.00
12/02/20	AR	OUTLINE AND BEGIN DRAFTING SHELL RULE 26(F) STATEMENT FOR CONFERENCE.	0.80	475	380.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
12/03/20	AR	TELECONFERENCE WITH HD REGARDING RULE 26 CONFERENCE; REVIEW ORDERS AND DRAFT CORRESPONDENCE REGARDING THE SAME.	0.50	475	237.50
12/03/20	HD	TELEPHONE CONFERENCE WITH ATTORNEY RONAN REGARDING RULE 26(F) MEET AND CONFER REQUIREMENT AND JOINT STATEMENT. RESEARCH LOCAL RULES AND JUDGE'S RULES REGARDING RULE 26(F). PREPARE AND SEND EMAIL CORRESPONDENCE TO ATTORNEY RONAN PROVIDING RESEARCH INFORMATION AND JOINT STATEMENT TEMPLATE.	0.50	250	125.00
12/04/20	AR	REVIEW AND ANALYSIS OF LOCAL RULES RE: RULE 26(F) CONFERENCE IN PREPARATION FOR RULE 26(F) CONFERENCE, DISCUSS REQUIREMENT WITH CL; REVIEW AND ANALYSIS OF INITIAL PRETRIAL SCHEDULING ORDER.	0.70	475	332.50
12/04/20	CL	REVIEW AND ANALYSIS OF LOCAL RULES RE: RULE 26(F) CONFERENCE IN PREPARATION FOR RULE 26(F) CONFERENCE, DISCUSS REQUIREMENT WITH A. RONAN.	0.40	495	198.00
12/04/20	HD	PREPARE PLAINTIFF'S WRITTEN DISCOVERY REQUEST WITH RESPECT TO THE CASE REMOVED TO FEDERAL COURT. INCLUDING REQUEST FOR PRODUCTION, REQUEST FOR ADMISSIONS, INTERROGATORIES, NOTICE OF DEPOSITION OF DEFENDANT AND PROOF OF SERVICE.	2.00	250	500.00
12/07/20	AR	FOLLOW UP CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING RULE 26(F) CONFERENCE.	0.30	475	142.50
12/07/20	AR	BEGIN REVIEW/REVISION OF DISCOVERY FOR SERVICE AFTER RULE 26(F) CONFERENCE.	0.50	475	237.50

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
12/09/20	JH	DISCUSS RULE26F CONFERENCE WITH AR	0.50	550	275.00
12/09/20	AR	TELECONFERENCE WITH JH REGARDING RULE 26(F) CONFERENCE.	0.30	475	142.50
12/10/20	AR	REVIEW AND OUTLINE FRCP, LOCAL RULES AND DEPARTMENT RULES IN ADVANCE OF CALL WITH OPPOSING COUNSEL; TELECONFERENCE WITH CL AND CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING THE SAME.	1.20	475	570.00
12/10/20	CL	REVIEW AND ANALYZE USDC MODEL PROTECTIVE ORDER IN PREPARATION FOR DRAFT TO DEFENSE COUNSEL; REVIEW AND ANALYZE DOCUMENTS RELATED TO PLAINTIFF'S FCRA CLAIMS IN PREPARATION FOR DISCUSSION WITH A. RONAN ARE: MANAGEABILITY OF PAGA CLAIMS IN PREPARATION FOR RULE 26(F) CONFERENCE.	0.90	495	445.50
12/11/20	AR	FOLLOW UP CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING MEET AND CONFER EFFORTS.	0.20	475	95.00
12/11/20	CL	REVIEW AND ANALYZE NEGATIVE TREATMENT WITH RESPECT TO ANDREWS V. JOINT CLERKS AND CORNS V. MILLER IN PREPARATION FOR MEET AND CONFER WITH OPPOSING COUNSEL BASED UPON DEFENDANT'S POSITION THAT ANDREWS IS NO LONGER GOOD LAW AND IN PREPARATION FOR OPPOSITION TO MOTION FOR RECONSIDERATION.	1.60	495	792.00
12/15/20	JH	DISCUSS RULE 26F CONFERENCE WITH AR	0.50	550	275.00
12/15/20	AR	OUTLINE ORDERS; CONDUCT RULE 26(F) CONFERENCE WITH OPPOSING COUNSEL; DRAFT SUMMARY OF THE SAME.	1.20	475	570.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
12/15/20	AR	BEGIN DRAFTING RULE 26(F) REPORT.	0.60	475	285.00
12/15/20	AR	CORRESPONDENCE REGARDING SERVICE OF DISCOVERY AND ELECTRONIC SERVICE AGREEMENT.	0.30	475	142.50
12/17/20	AR	REVISE AND FINALIZE DRAFT BELAIRE-WEST NOTICE AND PROTECTIVE ORDER FOR REVIEW BY OPPOSING COUNSEL.	0.80	475	380.00
12/17/20	AR	REVIEW COMPLAINT AND CASE NOTES; DRAFT JOINT RULE 26(F) REPORT.	0.80	475	380.00
12/17/20	AR	RESEARCH REGARDING LIMITATIONS ON DISCOVERY.	0.50	475	237.50
12/17/20	AR	DRAFT WRITTEN DISCOVERY AND PMK DEPOSITION NOTICE.	2.20	475	1,045.00
12/18/20	JH	REVIEW AND REVISE DRAFT BELAIRE NOTICE, PROTECTIVE ORDER, AND RULE 6F CONFERENCE REPORT; DISCUSS WITH AR	1.20	550	660.00
12/18/20	AR	REVISE AND FINALIZE 26(F) REPORT; BELAIRE-WEST NOTICE AND PROTECTIVE ORDER; CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING THE SAME.	0.40	475	190.00
12/22/20	AR	REVIEW STATUS OF DISCOVERY; DRAFT SUMMARY OF THE SAME.	0.40	475	190.00
12/22/20	AR	UPDATE AND FINALIZE NOTICE OF DEPOSITION FOR FEDERAL COURT; CORRESPONDENCE WITH HD REGARDING COURT REPORTER.	0.50	475	237.50
12/23/20	JH	REVIEW AND REVISE PLAINTIFF'S FIRST SET OF DISCOVERY REQUESTS; DISCUSS WITH AR	1.50	550	825.00
12/23/20	AR	FINALIZE AND PREPARE DISCOVERY FOR SERVICE; CORRESPONDENCE REGARDING THE SAME.	0.80	475	380.00
01/11/21	AR	REVIEW FILE, CORRESPONDENCE	0.20	475	95.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		WITH OPPOSING COUNSEL REGARDING RULE 26(F) REPORT.			
01/11/21	AR	REVIEW AND EXTRACT INFORMATION FROM COMPLAINT; BEGIN DRAFTING DATA REQUEST CORRESPONDENCE.	0.80	475	380.00
01/12/21	AR	COMPLETE DRAFT OF DATA REQUEST; MULTIPLE CORRESPONDENCE WITH AB REGARDING THE SAME.	0.50	475	237.50
01/12/21	AR	RECEIVE AND REVIEW JOINT 26F REPORT FROM DEFENDANT; CORRESPONDENCE REGARDING THE SAME.	0.50	475	237.50
01/14/21	AR	REVIEW FILE, DRAFT AND SERVE INITIAL DISCLOSURES.	0.80	475	380.00
01/14/21	AR	REVIEW AND REVISE RULE 26F REPORT.	0.50	475	237.50
01/14/21	AR	REVIEW CLIENT FILE DOCUMENTS FOR DATA REQUEST.	0.60	475	285.00
01/14/21	CL	REVISE PRAYER AND DAMAGES SECTION TO INITIAL DISCLOSURES.	0.20	495	99.00
01/15/21	JH	REVIEW AND REVISED PLAINTIFF'S MEDIATION DATA REQUEST	0.40	550	220.00
01/15/21	AR	REVISE AND FINALIZE 26F REPORT; CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING THE SAME.	0.50	475	237.50
01/15/21	AR	REVIEW POLICIES, REVISE AND FINALIZE MEDIATION DATA REQUEST AND DRAFT CORRESPONDENCE TO OPPOSING COUNSEL.	0.80	475	380.00
01/21/21	JH	DISCUSS DISCOVERY AND MEDIATION WITH TEAM	0.40	550	220.00
03/09/21	AR	RECEIVE AND REVIEW INITIAL DISCLOSURES; CORRESPONDENCE REGARDING THE SAME.	0.40	475	190.00
05/14/21	AR	RECEIVE AND REVIEW NOTICE FROM COURT; REVIEW DOCKET AND DRAFT	0.40	475	190.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		FOLLOW UP CORRESPONDENCE.			
05/25/21	JH	REVIEW AND ANALYZE CORRESPONDENCE FROM DEFENSE COUNSEL RE MEDIATION; DISCUSS WITH TEAM	0.70	550	385.00
05/26/21	JH	MULTIPLE CORRESPONDENCE WITH DEFENSE COUNSEL RE MEDIATION	0.60	550	330.00
06/05/21	ND	REVIEW AND ANALYZE DATA PRODUCED FOR MEDIATION PURPOSES. CALL WITH PLAINTIFF REGARDING CLAIMS AND FACTS FOR MEDIATION BRIEF.	4.50	850	3,825.00
06/07/21	ND	ANALYZE PREVIOUS FCRA SETTLEMENTS TO DETERMINE MEDIATION VALUATION. ANALYZE VARIOUS FCRA FORMS FOR EXTRANEIOUS INFORMATION CLAIM.	1.90	850	1,615.00
06/08/21	CL	EMAIL TO C. BERNARD RE: SERVICE LIST AND SECURE TRANSFER FILE.	0.20	495	99.00
06/08/21	ND	DRAFT MEDIATION BRIEF. REVIEW AND ANALYZE CLAIMS AND LAW.	5.00	850	4,250.00
06/09/21	JH	REVIEW AND ANALYZE DEFENDANT'S MEDIATION DOCUMENT PRODUCTION; UPDATE EXHIBIT BOOK	1.50	550	825.00
06/10/21	JH	DISCUSS MATTER WITH EXPERT; CORRESPONDENCE WITH DEFENSE COUNSEL RE MISSING DATA	0.50	550	275.00
06/12/21	ND	ANALYZE ALL PAY STUBS EXEMPLARS. ANALYZE 204(A) CLAIMS. REVIEW DISCOVERY TO DATE. PREPARE FOR MEDIATION.	3.80	850	3,230.00
06/13/21	ND	REVIEW AND REVISE MEDIATION BRIEF.	2.60	850	2,210.00
06/14/21	JH	REVIEW AND SEND UPDATED DATA TO EXPERT; DISCUSS WITH EXPERT RE SAME	0.50	550	275.00
06/14/21	NBB	REVIEW DOCS, ANALYZE RE	2.50	795	1,987.50

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		SETTLEMENT ISSUES. ADVISE AJ.			
06/15/21	JH	MULTIPLE CORRESPONDENCE WITH DEFENSE COUNSEL RE DEFICIENCIES IN MEDIATION DATA PRODUCTION	0.50	550	275.00
06/16/21	JH	ADDITIONAL F/U CORRESPONDENCE WITH DEFENSE COUNSEL RE MEDIATION DATA	0.40	550	220.00
06/16/21	JH	REVIEW AND ANALYZE DEFENDANT'S SECOND SUPPLEMENTAL MEDIATION PRODUCTION	0.50	550	275.00
06/17/21	JH	REVIEW/ANALYZE DAMAGES SUMMARY FROM EXPERT	0.60	550	330.00
06/19/21	JH	REVIEW AND ANALYZE MEDIATION BRIEF	1.00	550	550.00
06/19/21	ND	REVIEW EXPERT REPORT AND ANALYSIS. DRAFT MOU FOR MEDIATION. REVIEW PREVIOUS SETTLEMENTS WITH SIMILAR CLAIMS AND CLASS MEMBER FOR MEDIATION VALUATION.	4.20	850	3,570.00
06/22/21	AJB	PREP AND APPEAR FOR MEDIATION.	6.00	725	4,350.00
06/22/21	AR	REVIEW AND OUTLINE PRIOR DISCOVERY PURSUANT TO CORRESPONDENCE REGARDING STATUS.	0.70	475	332.50
06/22/21	SB	ATTEND MEDIATION	8.00	325	2,600.00
06/22/21	AJB	REVIEW/ANALYZE CORR FROM DEFENDANT RE SETTING UP MEDIATION AND CLASS SIZE. DRAFT/SEND CORR TO MEDIATOR'S OFFICE WITH INSTRUCTIONS. ANALYZE NEXT STEPS TO PREP FOR MEDIATION.	1.00	725	725.00
07/06/21	JH	DISCUSS WITH AJB RE OUTCOME OF MEDIATION	0.40	550	220.00
07/19/21	AR	REVIEW FILE AND DOCKET FOR STATUS; CORRESPONDENCE WITH JCL	0.50	475	237.50

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		AND ZAKAY LAW REGARDING CASE TIMELINE.			
02/04/22	ND	REVIEW AND REVISE SETTLEMENT AGREEMENT. DISCUSS WITH CO-COUNSEL.	1.80	850	1,530.00
<u>TOTAL BILLED HOURS</u>					
A.J.BHOWMIK		7.00 hr @ 725.00	\$	5,075.00	
ANDREW RONAN		37.30 hr @ 475.00	\$	17,717.50	
CHRISTINE LEVU		3.60 hr @ 495.00	\$	1,782.00	
HEATHER DROSI		10.80 hr @ 250.00	\$	2,700.00	
JEFF HERMAN		15.70 hr @ 550.00	\$	8,635.00	
JACKLAND HOM		2.25 hr @ 295.00	\$	663.75	
NORMAN BLUMENTHAL		7.50 hr @ 795.00	\$	5,962.50	
NICK DEBLOUW		54.30 hr @ 850.00	\$	45,815.00	
RICO EHMANN		8.80 hr @ 475.00	\$	4,180.00	
SCOTT BLUMENTHAL		13.40 hr @ 325.00	\$	4,355.00	
TOTAL PROFESSIONAL SERVICES			160.65		<u>\$ 96,885.75</u>
COSTS ADVANCED					
05/01/20	LEXIS NEXIS				288.00
09/30/20	FILING FEE				1,837.36
10/31/20	MESSENGER - KNOX				156.75
11/03/20	FILING FEE				100.75
12/29/20	MEDIATION FEES - FIRST MEDIATION/KRIVIS				8,000.00
01/04/21	LEXIS NEXIS				2,007.00
06/26/21	BERGER CONSULTING GROUP				<u>2,062.50</u>
TOTAL COSTS ADVANCED					<u>\$ 14,452.36</u>
TOTAL CURRENT CHARGES					<u>\$111,338.11</u>