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*Attorneys for Plaintiff Rashon Hayes
and the Settlement Class*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

RASHON HAYES, individually, and on
behalf of other members of the general public
similarly situated, and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

THE CONTAINER STORE, INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 20CV363825

Honorable Theodore C. Zayner
Department 19

CLASS ACTION

**DECLARATION OF ELIZABETH
PARKER-FAWLEY IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT, CLASS
ATTORNEYS' FEES AND EXPENSES,
AND INCENTIVE AWARD**

Date: July 22, 2026
Time: 1:30 p.m.
Department: 19

Complaint Filed: February 10, 2020
FAC Filed: August 3, 2020
Trial Date: None Set

DECLARATION OF ELIZABETH PARKER-FAWLEY

I, Elizabeth Parker-Fawley, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Rashon Hayes (“Plaintiff”) and the Settlement Class Member in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On February 5, 2026, the Court preliminarily approved the Settlement Agreement and Release of Class and Representative Action Claims (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiff and Defendant The Container Store, Inc., (“Defendant,”) (together with Plaintiff referred to as the “Parties”) and conditionally certified the Settlement Class for settlement purposes. The Court provisionally appointed Plaintiff Rashon Hayes as the representative of the Settlement Class (“Class Representative”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Settlement Class (“Class Counsel”).

3. The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Class Attorneys’ Fees and Expenses, and Incentive Award (“Motion for Final Approval”), no Settlement Class Member has objected to the Class Settlement, the contemplated request for Class Attorneys’ Fees and Expenses, Incentive Award, and Administrative Expenses, or the allocation for the PAGA Payment.

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WORK PERFORMED BY CLASS COUNSEL

5. I and several other attorneys at Lawyers *for* Justice, PC have been actively performing work in this matter since prior to its commencement on February 10, 2020.

6. Before initiating the case, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and Plaintiff and research into the various legal issues involved in the case, namely, the current state of the law as it applied to class certification, representative adjudication, and trial; the law relating to class certification, manageability, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, representative Private Attorneys General Act (“PAGA”) claims and penalties, and wage-and-hour law and enforcement, Plaintiff’s claims and allegations, and potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC were of the opinion that the claims of Plaintiff were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees of Defendant in California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

7. Class Counsel conducted significant formal and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, and were preparing the case for class certification and trial, prior to reaching the Settlement. The Parties exchanged thousands of pages of information, documents, and data throughout the course of the litigation and in connection with the mediation and settlement negotiations. On August 7, 2020, Plaintiff served Special Interrogatories (Sets One and Two), Form Interrogatories—General (Set One) and Request for Document Production (Set One), and reviewed Defendant’s responses thereto. On September 15, 2020, Defendant propounded its Special Interrogatories (Set One) and Requests for Production of Documents (Set One) to Plaintiff, to which Plaintiff responded. On June 10, 2022, Defendant propounded its Requests for Production of Documents (Set Two), to which Plaintiff responded. On June 16, 2023, Defendant propounded its Requests

for Production of Documents (Set Three) and Special Interrogatories (Set Two), to which Plaintiff responded. The Parties met and conferred extensively through multiple rounds of supplemental responses, informal discovery conferences, motion practice, and a *Belair-West* notice administration prior to the production of the class contact information. Additionally, Class Counsel deposed Defendant's persons most knowledgeable, Stephanie Lind and Donald Leary, on December 8, 2021 and March 23, 2022, respectively. Defendant deposed Plaintiff on January 24, 2024. The volume of additional data and documents that Class Counsel reviewed and analyzed included and was not limited to: Plaintiff's employment records, Plaintiff's time and pay data, time and pay data for a sampling of approximately 25% of other Class Members, company policy acknowledgments, forms, procedures and policies (including, but not limited to, Employee Handbook, California Employment Law Guide, Attendance Policy, Paid Time Off Policy, Timekeeping Policy, Predictive Scheduling Policy, Schedule Deviations Process, Attestation Guide, Attestation Premium Process, Travel Expense Policy, Travel and Expense Reimbursement Process, Code of Business Conduct and Ethics, Mutual Agreement to Arbitrate, Change in Status/Exit Form, Workplace Training Forms, and Job Descriptions) among other information and documents. Class Counsel had the opportunity to interview Plaintiff and other Class Members to gather facts and to identify potential witnesses. Counsel for the Parties met and conferred on numerous occasions, e.g., to discuss issues relating to the pleadings, formal and informal discovery, and the production of documents and data prior to the mediation. Class Counsel also drafted Plaintiff's pleadings, cross-motions to compel discovery, and mediation brief and prepared for and attended court proceedings, settlement negotiations, and the mediation, among other tasks.

8. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating this matter, mediation, and extensive settlement negotiations. Class Counsel analyzed thousands of pages of information, documents, and data obtained from Plaintiff, Defendant, and other sources that provided a critical understanding of the nature of the work performed by the Class Members and Aggrieved Employees, as well as Defendant's organizational structure and their operations and employment

1 policies, practices, and procedures. The information, documents, and data were used in analyzing
2 liability, damages, penalties, and other valuation issues in connection with all phases of the
3 litigation, and ultimately, in connection with the mediation and settlement negotiations process.
4 Class Counsel also performed significant research into the applicable law, which is evolving as it
5 relates to class certification, manageability, off-the-clock theory, meal and rest periods,
6 representative PAGA claims and penalties, wage-and-hour enforcement, Plaintiff's claims and
7 allegations, and Defendant's defenses thereto, as well as facts discovered.

8 9. After conducting significant investigation of the facts and law during the
9 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to
10 try to resolve the case. These efforts included participating in a mediation session conducted by
11 Paul Grossman, Esq., a well-regarded mediator experienced in handling complex labor and
12 employment matters. During all settlement discussions, the Parties conducted their negotiations
13 at arm's length in an adversarial position. In the course of the mediation and settlement
14 negotiations, the Parties exchanged documents and data, and discussed various aspects of the
15 case, including and not limited to, the risks and delays of further litigation, the risks and
16 expenses to the Parties of proceeding with class certification, representative adjudication, and
17 trial; the law relating to class certification, manageability, off-the-clock theory, rounding, regular
18 rates of pay, meal and rest periods (including *inter alia*, on-premises breaks), expense
19 reimbursements, recordkeeping and wage statement requirements, representative PAGA claims
20 and penalties, and wage-and-hour law and enforcement; Plaintiff's claims and allegations, and
21 Defendant's defenses thereto; Defendant's financial condition; as well as the evidence produced
22 and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that
23 was acceptable to the Parties was not easy. Defendant contended that it complied with all
24 applicable law, denied any liability, and contended that individualized questions of fact
25 predominate over any common issues, and these issues would pose challenges to class
26 certification and representative adjudication. Defendant and its counsel felt strongly about
27 Defendant's ability to avoid class certification and prevail on the merits, while Plaintiff and
28 Class Counsel believed that they would be able to obtain class certification and prevail at trial.

With the aid of the mediator's evaluation, the Parties ultimately agreed that this matter was well-suited for settlement given the legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in this matter, and the real possibility of no monetary recovery after years of litigation, especially in light of Defendant's financial condition.

10. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees to be deducted from the Gross Settlement Amount in the amount of \$875,000.00, which is thirty-five percent (35%) of the Gross Settlement Amount of \$2,500,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this case. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving a Gross Settlement Amount of \$2,500,000.00 (with a Net Settlement Amount of approximately at least \$1,309,711.00 to be paid to Settlement Class Members (with gross Individual Settlement Payments averaging approximately more than \$533.27), payment of \$62,500.00 to Aggrieved Employees (with Individual PAGA Payment averaging approximately \$36.72) and payment of \$187,500.00 to the State of California)—support the percentage fee sought.

12. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel has incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **499 hours**

performing tasks and obtaining recovery in this matter. Attached hereto as “**EXHIBIT 1**” is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

13. The work performed in this particular matter, the background of Lawyers *for* Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable blended hourly rate of compensation of at least \$850 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded attorneys’ fees, compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys’ fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys’ fees involved compensation at the rate of \$919.57 per hour; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys’ fees involved compensation at the rate of \$855.96 per hour.

EXPERIENCE AND ADEQUACY OF

LAWYERS *for* JUSTICE, PC

14. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC

is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

15. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert

witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers for Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade, and litigated over 1,000 class action or representative action cases.

16. Arby Aiwarzian is a Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative action cases have resulted in settlements that have been granted court approval. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

17. Joanna Ghosh is a Senior Member of Lawyers for Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of

Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and She is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwasian, and Arby Aiwasian's supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

18. I am the Senior Director of Litigation at Lawyers for Justice, PC. I earned my Bachelor of Arts in History at Chapman University in 2011 and my Juris Doctor from the UCLA School of Law in 2014. In December 2014, I obtained a license to practice law from the California State Bar. I am admitted to practice in all courts in the State of California, as well as

the Central, Southern, Northern, and Eastern District Courts of California and the Ninth Circuit Court of Appeal. Since December 2014, I have worked at Lawyers for Justice, PC, and my practice has almost exclusively focused on the prosecution of employment class actions and representative actions, handling cases in all stages of litigation from initial pleadings to assisting with class action trial matters, attending mediations, and preparing class action settlements. As Senior Director of Litigation, I oversee attorneys working on hundreds of employment class actions and representative actions, provide internal training for our litigation practice group and post-bar law clerks, review and advise attorneys on work product and practices, and supervise cases from their inception to final accounting. I am a member of the California Lawyers Association Labor & Employment Group.

**LITIGATION COSTS AND EXPENSES INCURRED BY
LAWYERS FOR JUSTICE, PC**

19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of litigation costs and expenses of up to \$30,680.00 to be deducted from the GSA. Lawyers for Justice, PC seeks reimbursement of **\$30,680.00** in litigation costs and expenses incurred in the matter, as reflected in “**EXHIBIT 2**” attached hereto. These expenses were reasonable and necessary in the prosecution of the matter and to obtain the Settlement.

INCENTIVE AWARD TO PLAINTIFF

20. In recognition of his efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as his broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 1.11.3 of the Settlement Agreement), the Settlement provides for an Incentive Award in the amount of up to \$14,000.00 to Plaintiff from the GSA. Plaintiff spent a substantial amount of time and effort discussing his employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain and provide information that would help obtain a recovery in this matter. Plaintiff participated in extensive

1 written discovery and prepared for and appeared at his deposition in January 2024. Accordingly,
2 it is appropriate for Plaintiff to receive \$14,000.00 as a reasonable Incentive Award for his
3 broader waiver and release of claims and services performed in this matter, in addition to his
4 individual settlement payment(s).

5 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
6 interests of Plaintiff, the Settlement Class Members, PAGA Settlement Group Members, and the
7 State of California.

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

10 Executed this 29th day of June 2026, at Glendale, California.

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12 _____
13 Elizabeth Parker-Fawley
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EXHIBIT 1

RASHON HAYES VS. THE CONTAINER STORE, INC.
Santa Clara County Superior Court Case No. 20CV363825

CHAPTER 11 CASE IN RE: THE CONTAINER STORE GROUP, INC., ET AL.
United States Bankruptcy Court for the Southern District of Texas, Houston Division
Case No. 24-90627 (“Bankruptcy Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate and/or Review Communication with Plaintiff Rashon Hayes (“Plaintiff Hayes”)	42.0
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	16.0
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Hayes’ Class Action Claims, Conduct Legal Research and Analysis Regarding All Claims Involved, and Draft, Review, and/or Revise Plaintiff’s Class Action Complaint for Damages (filed on February 10, 2020)	3.6
Review Court’s Order Deeming Case Complex and Staying Discovery and Responsive Pleading Deadlines (filed on March 9, 2020)	0.2
Review The Container Store, Inc.’s (“Defendant”) Notice of Appearance (served on April 1, 2020)	0.1
Meet and Confer with Defendant’s Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on June 4, 2020)	2.3

Review Court's Order to Continue Case Management Conference (filed on June 4, 2020)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (submitted on July 17, 2020)	2.7
Review Court's Minute Order Re: Case Management Conference (filed on July 24, 2020)	0.1
Review Court's Notice of Further Case Management Conference (filed on July 28, 2020)	0.1
Draft, Review, and/or Revise Plaintiff's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on August 3, 2020)	1.5
Review Court's Notice of Rescheduled Case Management Conference (filed on August 26, 2020)	0.1
Review Defendant's Answer to Plaintiff's Unverified First Amended Complaint (served on September 8, 2020)	0.5
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (submitted on December 2, 2020)	1.2
Review Court's Minute Order Re: Case Management Conference (filed on December 9, 2020)	0.1
Review Court's Notice of Further Case Management Conference (filed on December 10, 2020)	0.1
Draft, Review, and/or Revise Plaintiff's Notice of Posting Jury Fees (filed on January 3, 2021)	0.1
Review Court's Order and Notice of Informal Discovery Conference (filed on January 25, 2021)	0.1
Review Defendant's Informal Discovery Conference Statement (served on February 11, 2021)	1.0
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (submitted on April 8, 2021)	1.3
Review Court's Minute Order Re: Case Management Conference (filed on April 14, 2021)	0.1
Review Court's Notice of Further Case Management Conference (filed on April 14, 2021)	0.1

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (submitted on August 6, 2021)	0.7
Review Court's Minute Order Re: Case Management Conference (filed on August 16, 2021)	0.1
Review Court's Notice of Further Case Management Conference (filed on August 16, 2021)	0.1
Review Defendant's Request for Appointment of Official Reporter Pro Tempore (served on November 16, 2021)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (submitted on November 23, 2021)	0.7
Review Court's Minute Order Re: Case Management Conference (filed on December 1, 2021)	0.1
Review Court's Notice of Further Case Management Conference (filed on December 3, 2021)	0.1
Review Court's Order and Notice of Informal Discovery Conference (filed on February 17, 2022)	0.1
Draft, Review, and/or Revise Plaintiff's Informal Discovery Conference Brief (served on February 23, 2022)	3.0
Review Defendant Request for Appointment of Official Reporter Pro Tempore (served on March 15, 2022)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (submitted on March 25, 2022)	1.2
Review Court's Minute Order Re: Case Management Conference (filed on March 30, 2022)	0.1
Review Court's Notice of Further Case Management Conference (filed on April 4, 2022)	0.1
Review Court's Order and Notice of Informal Discovery Conference (filed on April 6, 2022)	0.1
Draft, Review, and/or Revise Plaintiff's Informal Discovery Conference Brief (filed on April 8, 2022)	2.5
Review Defendant's Request for Appointment of Official Reporter Pro Tempore (served on July 14, 2022)	0.1

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement; and [Proposed] Order (submitted on July 20, 2022)	0.4
Review Court's Order to Continue Case Management Conference (filed on July 20, 2022)	0.1
Review Court's Notice of Rescheduled Case Management Conference (filed on July 20, 2022)	0.1
Review Defendant's Request for Appointment of Official Reporter Pro Tempore (submitted on August 2, 2022)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (submitted on August 5, 2022)	1.7
Review Court's Notice of Further Case Management Conference (filed on August 16, 2022)	0.1
Review Defendant's Request for Appointment of Official Reporter Pro Tempore (served on November 23, 2022)	0.1
Review Court's Order Appointing Official Reporter Pro Tempore (filed on November 29, 2022)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (submitted on December 2, 2022)	1.2
Review Court's Minute Order Re: Case Management Conference (filed on December 8, 2022)	0.1
Review Court's Notice of Further Case Management Conference (filed on December 12, 2022)	0.1
Review Defendant's Substitution of Attorney – Civil (served on March 21, 2023)	0.1
Review Defendant's Notice of Remote Appearance (served on March 30, 2023)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (submitted on March 30, 2023)	1.7
Review Court's Notice of Rescheduled Case Management Conference (filed on April 3, 2023)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation Re: The Parties' Motion to Compel Supplemental Responses Briefing Schedules; [Proposed] Order (submitted on April 11, 2023)	0.6

Review Court's Minute Order Re: Case Management Conference (filed on April 12, 2023)	0.1
Review Court's Notice of Further Case Management Conference (filed on April 12, 2023)	0.1
Review Court's Order Regarding the Parties' Motion to Compel Supplemental Responses Briefing Schedules (filed on April 13, 2023)	0.1
Draft, Review, and/or Revise Plaintiff's Notice of Entry of Judgment or Order Regarding the Parties' Motion to Compel Supplemental Responses Briefing Schedules (filed on April 17, 2023)	0.1
Review Defendant the Container Store, Inc.'s Notice of Application and Application for the Pro Hac Vice Admission of Natali Wyson; Memorandum of Points and Authorities [CRC 9.40], Verified Application of Natali Wyson to Appear as Counsel Pro Hac Vice for Defendant The Container Store, Inc. [CRC 9.40] (served on April 18, 2023)	0.2
Review Defendant the Container Store, Inc.'s Amended Notice of Application and Application for the Pro Hac Vice Admission of Natali Wyson; Memorandum of Points and Authorities [CRC 9.40] (served on April 19, 2023)	0.1
Review Court's Order Granting Verified Application of Natali Wyson to Appear as Counsel Pro Hac Vice for Defendant (filed on May 10, 2023)	0.1
Review Court's Minute Order Re: Hearing on Pro Hac Vice Counsel (filed on May 17, 2023)	0.1
Review Defendant's Notice of Application and Application for the <i>Pro Hac Vice</i> Admission of Jordan T. Varberg; Memorandum of Points and Authorities [CRC 9.40], Verified Application of Jordan T. Varberg to Appear as Counsel <i>Pro Hac Vice</i> for Defendant [CRC 9.40] and [Proposed] Order Thereon (served on June 29, 2023)	0.1
Review Defendant's Amended Notice of Application and Application for the <i>Pro Hac Vice</i> Admission of Jordan T. Varberg; Memorandum of Points and Authorities [CRC 9.40] (served on July 6, 2023)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (submitted on July 7, 2023)	1.2
Review Court's Tentative Ruling on Motion to Compel Further Discovery Responses (published on July 11, 2023)	1.5

Review Court's Minute Order Re: Case Management Conference (filed on July 12, 2023)	0.1
Review Court's Minute Order Re: Motion to Compel Further Discovery Responses (filed on July 12, 2023)	0.2
Review Court's Notice of Further Case Management Conference (July 24, 2023)	0.1
Review Court's Order Granting Verified Application of Jordan T. Varberg to Appear as Counsel Pro Hac Vice for Defendant (filed on July 31, 2023)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Supplemental Brief in Support of Plaintiff's and Defendant's Motion to Compel Further Discovery Responses and Declaration of Dominic Scarangella in Support Thereof (submitted on July 31, 2023)	2.70
Review Court's Minute Order Re: Hearing on Pro Hac Vice Counsel (filed on August 2, 2023)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (served on August 16, 2023)	0.8
Review Court's Tentative Ruling Regarding Motion to Compel and Case Management Conference (published on August 22, 2023)	2.5
Notice of Rescheduled Case Management Conference (filed on August 23, 2023)	0.1
Review Court's Minute Order Re: Case Management Conference (filed on August 23, 2023)	0.1
Review Court's Minute Order Re: Motion to Compel Further Responses to Special Interrogatories (Set Two) (filed on August 23, 2023)	0.1
Review Notice of Disassociation of Counsel Jordan Varberg (served on September 29, 2023)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise ADR Stipulation and Order (submitted on November 21, 2023)	0.1
Review Court's Notice of Rescheduled Case Management Conference (filed on November 27, 2023)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation and Protective Order – Confidential Designation Only (submitted on February 9, 2024)	2.3

Review Court's Protective Order – Confidential Designation Only (filed on February 9, 2024)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (submitted on March 21, 2024)	0.4
Review Court's Notice of Rescheduled Case Management Conference (filed on March 22, 2024)	0.1
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Status Conference Statement (submitted on October 11, 2024)	0.5
Review The Container Store, Inc.'s "Debtor's" Voluntary Petition for Non-Individuals Filing for Bankruptcy (served on December 22, 2024) (Bankruptcy Action)	2.5
Review Notice of Designation as Complex Bankruptcy Case (served on December 22, 2024) (Bankruptcy Action)	0.2
Review Emergency Motion of Debtors for Entry of an Order Directing Joint Administration of Chapter 11 Cases (served on December 22, 2024) (Bankruptcy Action)	1.0
Review Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to File a Consolidated Creditor Matrix and List of the 30 Largest Unsecured Creditors; (II) Waiving the Requirement to File a List of Equity Security Holders; (III) Authorizing the Debtors to Redact Certain Personally Identifiable Information; and (IV) Granting Related Relief (served on December 22, 2024) (Bankruptcy Action)	1.0
Review Declaration of Chad E. Coben, Chief Restructuring Officer, In Support of Chapter 11 Petition and First Day Motions, Exhibit A: Transactional Support Agreement, Exhibit B: DIP & ABL Commitment Letter (served on December 22, 2024) (Bankruptcy Action)	0.5
Review Declaration of Adam Dunayer in Support of the Debtors' DIP Motion (served on December 22, 2024) (Bankruptcy Action)	0.2

Review Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral; (II) Granting Liens and Providing Claims with Superpriority Administrative Expenses Status; (III) Granting Adequate Protection to the Prepetition Secured Parties; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief and Interim Order Thereof (served on December 22, 2024) (Bankruptcy Action)	1.5
Review Interim Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral; (II) Granting Liens and Providing Claims with Superpriority Administrative Expenses Status; (III) Granting Adequate Protection to the Prepetition Secured Parties; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief and Interim Order Thereof (served on December 22, 2024) (Bankruptcy Action)	0.5
Review Emergency Motion of Debtors for Entry of Interim and Final Order (I) Authorizing the Debtors to (A) Continue to Operate Their Existing Cash Management System, Including Maintenance of Existing Bank Accounts, Checks, and Business Forms, (B) Maintain Existing Deposit Practices, and (C) Preform Intercompany Transactions, (II) Waiving Certain U.S. Trustee Guidelines, and (III) Granting Related Relief (served on December 22, 2024) (Bankruptcy Action)	0.7
Review Emergency Ex Parte Application for Entry of Order Authorizing the Employment and Retention of Kurtzman Carson Consultants, LLC D/B/A Verita Global as Claims, Noticing, and Solicitation Agent (served on December 22, 2024) (Bankruptcy Action)	0.2
Review Order (I) Authorizing the Debtors to File a Consolidated Creditor Matrix and List of the 30 Largest Unsecured Creditors; (II) Waiving the Requirement to File a List of Equity Security Holders; (III) Authorizing the Debtors to Redact Certain Personally Identifiable Information; and (IV) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Interim Order (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral; (II) Granting Liens and Providing Claims with Superpriority Administrative Expenses Status; (III) Granting Adequate Protection to the Prepetition Secured Parties; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief (served on December 23, 2024)	0.2

Review Bankruptcy Court's Order Directing Joint Administration of Chapter 11 Cases (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Bankruptcy Court's Order Granting Complex Case Treatment (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Bankruptcy Court's Order Authorizing the Employment and Retention of Kurtzman Carson Consultants, LLC D/B/A Veritas Global as Claims, Noticing and Solicitation Agent (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Debtor's Emergency Motion of Debtors for Entry of an Order (I) Prohibiting Utilities From Altering, Refusing, or Discontinuing Service; (II) Approving the Debtor's Proposed Form of Adequate Assurance of Payment to Utilities, (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance, and (IV) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.6
Review Order (I) Prohibiting Utilities from Altering, Refusing, or Discontinuing Service; (II) Approving the Debtor's Proposed Form of Adequate Assurance of Payment to Utilities, (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance, and (IV) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Pay Certain Employee Compensation and Benefits, (B) Maintain and Continue Such Benefits and Other Employee-Related Programs, and (C) Pay Prepetition Claims of Contracted Labor; (II) Granting Relief from Automatic Stay with Respects for Workers' Compensation Claims; and (III) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.5
Review Order (1) Authorizing the Debtors to (A) Pay Certain Employee Compensation and Benefits, (B) Maintain and Continue Such Benefits and Other Employee-Related Programs, and (C) Pay Prepetition Claims of Contracted Labor; (II) Granting Relief from Automatic Stay with Respects for Workers' Compensation Claims; and (III) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.1

Review Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Insurance Program Obligations, (B) Maintain the Insurance Policies Postpetition, (C) Maintain the Bonding Program and Honor Related Obligations, and (D) Honor Letters of Credit; and (II) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Order (I) Authorizing the Debtors to (A) Pay Prepetition Insurance Program Obligations, (B) Maintain the Insurance Policies Postpetition, (C) Maintain the Bonding Program and Honor Related Obligations, and (D) Honor Letters of Credit; and (II) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Order Authorizing Payment of Prepetition of Taxes and Fees (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Emergency Motion of Debtors for Entry of an Order Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests in Debtors and (B) Claims of Certain Worthless Stock Reduction (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business and (II) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Order (I) Authorizing the Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business and (II) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.1

Review Emergency Motion of Debtors for Entry of Order (I) Scheduling Combined Hearing to Consider (A) Final Approval of Disclosure Statement, (B) Approval of Solicitation Procedures and Form Ballot, and (C) Confirmation of Plan; (II) Establishing and Objection Deadline to Object to Disclosure Statement and Plan; (III) Approving the Form and Manner of Notice of Combined Hearing, Objection Deadline, and Notice of Commencement; (IV) Approving Notice and Objection Procedures For the Assumption or Rejection of Executory Contracts and Unexpired Leases; (V) Conditionally Waiving Requirement to Convene the Section 341 Meeting of Creditors; (VII) Conditionally Approving the Disclosure Statement and (VIII) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.4
Review Court's Order (I) Scheduling Combined Hearing to Consider (A) Final Approval of Disclosure Statement, (B) Approval of Solicitation Procedures and Form Ballot, and (C) Confirmation of Plan; (II) Establishing and Objection Deadline to Object to Disclosure Statement and Plan; (III) Approving the Form and Manner of Notice of Combined Hearing, Objection Deadline, and Notice of Commencement; (IV) Approving Notice and Objection Procedures For the Assumption or Rejection of Executory Contracts and Unexpired Leases; (V)Conditionally Waiving Requirement to Convene the Section 341 Meeting of Creditors; (VII) Conditionally Approving the Disclosure Statement and (VIII) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Honor Prepetition Obligations to Customers and (B) Continue Customers Programs and (II) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Order (I) Authorizing the Debtors to (A) Honor Prepetition Obligations to Customers and (B) Continue Customers Programs and (II) Granting Related Relief (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Order Establishing Notification Procedures and Approving restrictions on (A) Certain Transfer of Interests in Debtors and (B) Claims of Certain Worthless Stock Deductions (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Disclosure Statement for Prepackaged Joint Plan of Reorganization of the Container Store Group, Inc. and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code (served on December 23, 2024) (Bankruptcy Action)	0.1

Review Prepackaged Joint Plan of Reorganization of the Container Store Group, Inc. and its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code (served on December 23, 2024) (Bankruptcy Action)	1.5
Review Court's Letter Re: Prospective Holders with Interest in Stocks of the Container Store Group, Inc. (served December 23, 2024) (Bankruptcy Action)	0.1
Review Court's Non-Voting Status Notice (served on December 23, 2024) (Bankruptcy Action)	0.3
Review Court's Notice of (I) Commencement of Chapter 11 Cases, (II) Combined Hearing on Disclosure Statement, Prepackaged Joint Chapter 11 Plan, and Related Matters, (III) Objection Deadlines and (IV) Summary of Prepackaged Joint Chapter 11 Plan (served on December 23, 2024) (Bankruptcy Action)	0.5
Review Release Opt-Out Form for Holders of Claims and Certain Interests in Non-Voting Classes (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Motion of Debtors for Entry of An Order Authorizing the Debtors to File Certain Documents Under Seal (served on December 23, 2024) (Bankruptcy Action)	0.1
Review Defendant's Notice of Bankruptcy Petition and Automatic Stay (served on December 31, 2024)	1.2
Review Debtors' Application for Entry of an Order (I) Authorizing the Employment and Retention of Latham & Watkins LLP as Bankruptcy Counsel and (II) Granting Related Relief (served on January 3, 2025) (Bankruptcy Action)	0.1
Review Application of Debtors to Employ and Retain Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel for the Debtors and Debtors in Possession (served on January 3, 2025) (Bankruptcy Action)	0.1
Review Application of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Employ and Retain FTI Consulting, Inc. as Financial Advisor, (B) Designated Chad E. Coben to Serve as Chief Restructuring Officer, and (C) Provide Additional Personnel for the Debtors Effective as of the Petition Date; and (II) Granting Related Relief (served on January 3, 2025) (Bankruptcy Action)	0.1
Review Application of Debtors to Employ and Retain Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker to the Debtors Effective as of the Petition Date (served on January 3, 2025) (Bankruptcy Action)	0.1

Review Application of Debtors for Entry of an Order Authorizing the Retention and Employment of A&G Realty Partners, LLC as a Real Estate Consultant and Advisor to the Debtors and Debtors in Possession (served on January 3, 2025) (Bankruptcy Action)	0.1
Review Court's Notice of Hearing on Status of Case (filed on January 6, 2025)	0.1
Review Debtor's Notice of Filing of Plan Supplement to Prepackaged Joint Plan of Reorganization of the Container Store Group, Inc. and Its Debtors Affiliate Under Chapter 11 of the Bankruptcy Code (served on January 14, 2025) (Bankruptcy Action)	0.6
Review Order Authorizing the Debtors to File Certain Documents Under Seal (served on January 15, 2025) (Bankruptcy Action)	0.1
Review Final Order (I) Authorizing the Debtors to (A) Continue to Operate Their Existing Cash Management System, Including Maintenance of Existing Bank Accounts, Checks, and Business Forms, (B) Maintain Existing Deposit Practices, and (C) Perform Intercompany Transactions, (II) Waiving Certain U.S. Trustee Guidelines, and (III) Granting Related Relief (served on January 16, 2025) (Bankruptcy Action)	0.1
Review Final Order (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) use Cash Collateral; (II) Granting Liens and Providing Claim with Superpriority Administrative Expense Status; (III) Granting Adequate Protection to the Prepetition First Lien Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief (served on January 16, 2025) (Bankruptcy Action)	0.1
Review Notice of Cancellation of Hearing Scheduled for January 21, 2025 (served on January 16, 2025) (Bankruptcy Action)	0.1
Review Order (I) Approving Debtors' Disclosure Statement and (II) Confirming First Amended Prepackaged Joint Plan of Reorganization of the Container Store Group, Inc. and its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code (served on January 17, 2025) (Bankruptcy Action)	0.7
Review Order (I) Approving Debtors' Disclosure Statement and (II) Confirming First Amended Prepackaged Joint Plan of Reorganization of the Container Store Group, Inc. and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code (served on January 24, 2025) (Bankruptcy Action)	0.5

Review Notice of Filing of Second Amended Plan Supplemental to the First Amended Prepackaged Joint Plan of Reorganization of the Container Store Group, Inc. and its Debtor Affiliated Under Chapter 121 of the Bankruptcy Code (served on January 27, 2025) (Bankruptcy Action)	0.3
Review Order (I) Authorizing the Debtors to (A) Employ and Retain FTI Consulting, Inc. as Financial Advisor, (B) Designate Chad E. Coben to Serve as Chief Restructuring Officer, and (C) Provide Additional Personnel for Debtors, Effective as of the Petition Date; and (II) Granting Related Relief (served January 28, 2025) (Bankruptcy Action)	0.1
Review Order (I) Authorizing the Employment and retention of Latham & Watkins LLP as Bankruptcy Counsel and (II) Granting Related Relief (served on January 28, 2025) (Bankruptcy Action)	0.1
Review Order Authorizing the Employment and Retention of Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker to the Debtors Effective as of the Petition Date (served on January 28, 2025) (Bankruptcy Action)	0.1
Review Order Authorizing the Retention and Employment of A&G Realty Partners, LLC as a Real Estate Consultant and Advisor to the Debtors and Debtors in Possession (served on January 28, 2025) (Bankruptcy Action)	0.1
Review Notice of (I) Entry of Combined Order, (II) Occurrence of Effective Date, and (III) Rejection Damages Claims Bar Date (served on January 28, 2025) (Bankruptcy Action)	0.1
Review Notice of Appeal and Statement of Election (served on February 3, 2025) (Bankruptcy Action)	0.4
Review The United States Trustee's Emergency Motion for a Stay of Confirmation Order Pending Appeal and Order Staying Confirmation Order Pending Appeal (served on February 3, 2025) (Bankruptcy Action)	0.2
Review Appellant's Statement of the Issues and Designation of Items for Record on Appeal (served on February 3, 2025) (Bankruptcy Action)	0.2
Review Reorganized Debtors' Motion for Entry of Final Decree Closing Certain of the Chapter 11 Cases (served on February 3, 2025) (Bankruptcy Action)	0.5
Draft, Review and/or Revise Plaintiff's Notice of Change of Address or Other Contact Information (filed on February 3, 2025)	0.1

Review Motion and Order for Admission of Cheryl L. Stengel <i>Pro Hac Vice</i> (served on February 15, 2025) (Bankruptcy Action)	1.0
Review Reorganized Debtors' Objection to the United States Trustees' Emergency Motion for a Stay of Confirmation Order Pending Appeal (served on February 24, 2025) (Bankruptcy Action)	0.2
Review Reply of Reorganized Debtors in Support of Motion for Entry of Final Decree Closing Certain of the Chapter 11 Cases (served on February 26, 2025) (Bankruptcy Action)	0.1
Review Notice of Hearing on United States Trustee's Emergency Motion for Stay of Confirmation Order Pending Appeal (served on March 3, 2025) (Bankruptcy Action)	0.1
Review Bankruptcy Clerk's Records Transmitted Regarding Appellant's Brief (served on March 4, 2025) (Bankruptcy Action)	0.1
Review The United States Trustee's Reply in Support of His Emergency Motion for a Stay of Confirmation Order Pending Appeal (served on March 4, 2025) (Bankruptcy Action)	0.1
Review United States Trustee's Witness/Exhibit List, Exhibits 1-9 (served March 7, 2025) (Bankruptcy Action)	0.1
Review Reorganized Debtors' Witness and Exhibit List and Declaration of Chad E. Coben In Support or Reorganized Debtors' Objection to the United States Trustee's Emergency Motion for a Stay of Confirmation Order Pending Appeal (served on March 7, 2025) (Bankruptcy Action)	0.1
Review Final Decree Closing Certain of the Chapter 11 Cases (served on March 11, 2025) (Bankruptcy Action)	0.5
Review United States Bankruptcy Court's Notice of Filing of Official Transcript (served on March 24, 2025) (Bankruptcy Action)	0.1
Review United States Bankruptcy Court's Notice of Filing of an Appeal (served on March 24, 2025) (Bankruptcy Action)	0.1
Review Order Denying the United States Trustee's Motion for a Stay of Confirmation Order Pending Appeal (ECF No. 210) (entered on April 7, 2025) (Bankruptcy Action)	0.1

Review Defendant's Notice of Confirmation of Bankruptcy Plan and Lift of Automatic Stay (served on April 22, 2025)	1.0
Review Bankruptcy Clerk's Record Transmission Re: Appellant Brief (served on July 14, 2025) (Bankruptcy Action)	0.1
Review Court's Minute Order Re: Case Status (filed on September 18, 2025)	0.1
Review Defendant's Request and Order for Telephone-Only Appearance in Civil Proceedings for Natali Wyson and Wendy M. Lazerson (served on January 6, 2026)	0.1
Draft Plaintiff's Notice of Remote Appearance Re: Further Case Conference and Plaintiff's Notice of Remote Appearance Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on January 12, 2026)	0.1
Review Defendant's Request and Order for Telephone-Only Appearance in Civil Proceedings for Natali Wyson and Wendy M. Lazerson (served on January 16, 2026)	0.1
Review Court's Orders Granting Telephonic Appearances in Civil Proceedings for Natali Wyson and Wendy M. Lazerson (filed on January 16, 2026)	0.1
Review Court's Minute Order Re: Case Management Conference (filed on January 26, 2026)	0.1
Draft Notice of Entry of Judgment or Order Re: Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on February 5, 2026)	0.1
Review United States District Court for the Southern District of Texas Houston Division's Memorandum and Opinion (served on February 12, 2026) (Bankruptcy Action)	0.1
Review Court's Order Setting Status Conference (Served on February 19, 2026) (Bankruptcy Action)	0.1
Appearances	
Prepare for and Remotely Attend Initial Case Management Conference (July 24, 2020)	0.8
Prepare for and Remotely Attend Case Management Conference (December 9, 2020)	1.8
Prepare for and Remotely Attend Case Management Conference (April 14, 2021)	1.5

Prepare for and Remotely Attend Case Management Conference (August 11, 2021)	0.5
Prepare for and Remotely Attend Case Management Conference (December 1, 2021)	0.6
Prepare for and Remotely Attend Informal Discovery Conference (February 25, 2022)	2.5
Prepare for and Remotely Attend Case Management Conference (March 30, 2022)	0.8
Prepare for and Remotely Attend Case Management Conference (April 12, 2022)	3.0
Prepare for and Remotely Attend Case Management Conference (August 10, 2022)	0.3
Prepare for and Remotely Attend Case Management Conference (December 7, 2022)	0.8
Prepare for and Remotely Attend Case Management Conference (April 12, 2023)	0.6
Prepare for and Remotely Attend Hearing on Motion to Compel and Case Management Conference (July 12, 2023)	2.3
Prepare for and Remotely Attend Status Conference Regarding Bankruptcy (September 10, 2025)	1.8
Prepare for and Remotely Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement (July 22, 2026) (anticipated)	1.0
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rashon Hayes (served on November 6, 2019)	0.5
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rashon Hayes	2.2
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; noticed for September 16, 2020) (served on August 7, 2020)	1.8
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Job Duties; noticed for September 17, 2020) (served on August 7, 2020)	2.0

Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant The Container Store, Inc. (served on August 7, 2020)	4.5
Review Defendant's Responses to Plaintiff Rashon Hayes' Special Interrogatories (Set One) (served on September 8, 2020)	0.5
Review Defendant's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable and Request for Production of Documents (Job Duties) (served on September 9, 2020)	2.5
Review Defendant's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable and Request for Production of Documents (Organizational Structure) (served on September 9, 2020)	1.8
Review Defendant's Special Interrogatories (Set One) and Requests for Production of Documents (Set One) to Plaintiff (served on September 15, 2020)	2.6
Review Defendant's Responses to Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) (served on October 8, 2020)	6.4
Draft Plaintiff's Responses to Defendant's Request for Production of Documents (Set One) and Special Interrogatories (Set One) (served on November 10, 2020)	19.4
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Job Duties; noticed for October 19, 2021) (served on September 23, 2021)	0.5
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Job Duties; noticed for October 18, 2021) (served on September 23, 2021)	0.5
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (Job Duties; noticed for October 19, 2021) (served on October 12, 2021)	0.5
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable and Requests for Production of Documents (Organizational Structure; noticed for October 18, 2021) (served on October 12, 2021)	0.5

Draft Plaintiff's Supplemental Responses to Defendant's Requests for Production of Documents (Set One) (served on November 4, 2021)	12.5
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Job Duties and Organizational Structure; noticed for December 8, 2021) (served on November 11, 2021)	0.8
Prepare for and Take the Deposition of Defendants' Person Most Knowledgeable Stephanie Lind (Video Conference; December 8, 2021) and Review Deposition Transcript	15.5
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable and Request for Production of Documents (served on November 29, 2021)	0.2
Draft Plaintiff's Further Supplemental Responses to Defendant's Requests for Production of Documents (Set One) (served on February 18, 2022)	5.7
Draft Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Job Duties and Organizational Structures; noticed for March 23, 2022) (served on February 14, 2022)	0.2
Review Defendant's Supplemental Responses to Plaintiff's Form Interrogatories, Special Interrogatories (Set Two), Document Production 000006 – 000094 and Supplemental Response to Request for Production of Documents (Set One) (served on February 16, 2022)	8.3
Review Defendant's Objection to Plaintiff's Amended Notice of Deposition of Person Most Knowledgeable and Requested for Production of Documents (noticed on March 23, 2022) (served on March 14, 2022)	0.3
Prepare for and Take the Deposition of Defendants' Person Most Knowledgeable Donal Leary (Video Conference; March 23, 2022) and Review Deposition Transcript	12.8
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Document (Job Duties and Organizational Structures; noticed on April 28, 2022) (served on April 8, 2022)	0.5

Review Defendant's Objections to Plaintiff's Notice of Deposition of Person Most Knowledgeable and Request for Production of Documents (Job Duties and Organizational Structures; noticed on April 28, 2022) (served on April 19, 2022)	0.3
Review Notice of Errata Regarding Donald Leary Deposition (served on May 11, 2022)	0.8
Review Defendant's Second Set of Request for Production of Documents to Plaintiff (served on June 10, 2022)	1.8
Draft Plaintiff's Response to Defendants Second Set of Requests for Production of Documents (served on July 12, 2022)	8.6
Draft Supplemental Responses to Defendant's Second Set of Request for Production of Documents (served on May 9, 2023)	3.1
Review Defendant's Supplemental Response to Plaintiff's Request for Production (Set One) and Verification Thereof (served on June 16, 2023)	2.5
Review Defendant's Supplemental Response to Plaintiff's Special Interrogatories (Set Two) and Verification Thereof (served on June 16, 2023)	1.3
Review Defendant's Third Set of Requests for Production of Documents and Second Set of Special Interrogatories to Plaintiff (served on June 16, 2023)	1.1
Draft Plaintiff's Responses to Defendant's Request for Production of Documents to Plaintiff (Set Three) and Special Interrogatories (Set Two) (served on July 19, 2023)	4.8
Draft Plaintiff's Supplemental Responses to Defendants Requests for Production of Documents (Set 3) (filed on November 10, 2023)	4.6
Review Defendant's Notice of Video Deposition of Plaintiff Rashon Hayes (noticed for January 24, 2024) (served on December 12, 2023)	0.3
Prepare for and Attend the Deposition of Plaintiff Rashon Hayes (Video Conference; January 24, 2024) and Review Deposition Transcript and Exhibits	13.9

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Job Duties; noticed for March 28, 2024) (filed on February 29, 2024)	0.5
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (Organization Structure; noticed for March 27, 2024) (filed on February 29, 2024)	0.5
Letters and Correspondence	
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with Defendant's Counsel	32.5
Draft Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff under the Private Attorneys General Act (served on February 12, 2020)	1.2
Draft Informal Discovery Conference Letter Brief to Honorable Patricia M. Lucas (submitted February 11, 2021)	0.9
Review Letter from The Container Store Re: Filing for Bankruptcy (served on December 24, 2024) (Bankruptcy Action)	0.3
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources Prior to Mediation	16.5
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Damages and Penalties Analyses and Calculations (submitted on February 13, 2024)	36.0
Travel to and Attend Mediation Session (February 21, 2024; Los Angeles)	24.5
Draft, Review, Revise, and/or Analyze Mediator's Proposal (Term Sheet) (issued March 5, 2024)	2.5
Draft, Review, Revise, and/or Analyze Mediator's Revised Proposal (Term Sheet) (issued March 6, 2024; fully executed on March 8, 2024)	4.0

Draft, Review, Revise, Negotiate, and Finalize Settlement Agreement and Release of Class Action and representative Action Claims (executed on October 21, 2024), and Draft, Review, and/or Revise Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval	14.6
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration and Review Weekly Reports, and Respond to Inquiries	3.0
Law and Motion	
Draft, Review and/or Revise Plaintiff's Amended Notice of Motion and Motion to Compel Defendant the Container Store, Inc to Provide Further Responses to Plaintiff's Request for Production of Documents (Set One) and Request for Monetary Sanctions, Declaration of Won Christina Chang in Support Thereof, Rule 3.1345 Separate Statement, [Proposed] Order (filed on April 10, 2023)	11.0
Draft, Review and/or Revise Plaintiff's Notice of Motion and Motion to Compel Defendant the Container Store, Inc to Provide Further Responses to Plaintiff's Special Interrogatories (Set Two) and Request for Monetary Sanctions, Declaration of Won Christina Chang in Support Thereof, Rule 3.1345 Separate Statement, [Proposed] Order (filed on April 10, 2023)	11.0
Review Defendant The Container Store, Inc.'s Notice of Motion and Motion to Compel Plaintiff to Provide Further Responses to Defendant's Special Interrogatories (Set One); Memorandum of Points and Authorities, Declaration of Wendy M. Lazerson in Support of Defendant The Container Store, Inc. Motion to Compel Plaintiffs to Provide Further Responses to Defendant's Special Interrogatories (Set One), Separate Statement In Support of Motion to Compel Plaintiff to Provide Further Responses to Defendant's Special Interrogatories (Set One), [Proposed] Order Thereon (served on May 1, 2023)	1.8
Review Defendant's Opposition to Plaintiff's Motion to Compel Further Responses to Plaintiff's Request for Production of Documents (Set One) and Request for Monetary Sanctions; Opposition to Plaintiff's Motion to Compel Further Responses to Plaintiff's Special Interrogatories (Set Two) and Request for Monetary Sanctions; Declaration of Wendy M. Lazerson in Support Thereof (served on June 16, 2023)	1.2
Draft, Review and/or Revise Plaintiff's Opposition to Defendant's Motion to Compel Plaintiff to Provide Further Responses to Defendant's Special Interrogatories (Set One) and Declaration of Won Christina Chang in Support Thereof (filed on June 16, 2023)	4.0

Review Defendant's Reply Brief in Support of Motion to Compel Plaintiff to Provide Further Responses to Defendant's Special Interrogatories (Set One) (served on June 28, 2023)	1.5
Draft, Review and/or Revise Plaintiff's Reply in Support of Motion to Compel Further Responses to Plaintiff's Request for Production of Documents (Set One) and Request for Monetary Sanctions and Declaration of Dominic Scarangella in Support Thereof (filed on June 28, 2023)	5.5
Draft, Review and/or Revise Plaintiff's Reply in Support of Motion to Compel Further Responses to Plaintiff's Special Interrogatories (Set Two) and Request for Monetary Sanctions and Declaration of Dominic Scarangella in Support Thereof (filed on June 28, 2023)	5.0
Research, Draft, Review, and/or Revise Plaintiff's Notice of and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Elizabeth Parker-Fawley in Support Thereof, Declaration of Plaintiff Rashon Hayes in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on September 5, 2025)	12.5
Review Court's Tentative Ruling on Motion for Preliminary Approval (published on January 20, 2026)	0.5
Review Court's Minute Order Re: Motion for Preliminary Approval (filed on January 21, 2026)	0.1
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on February 5, 2026)	0.1
Research, Draft, Review, and/or Revise Plaintiff's Notice of and Motion for Final Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Elizabeth Parker-Fawley in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on September 5, 2025)	14.5
Total Hours:	499.0

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Hayes vs. The Container Store, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/6/2019	U.S. Postmaster	Postage	\$6.85
11/6/2019	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
2/12/2020	U.S. Postmaster	Postage	\$6.95
2/24/2020	Legal Document Server, Inc.	Attorney Service	\$66.02
2/24/2020	Santa Clara Superior Court	Complex Filing Fee	\$1,000.00
2/24/2020	Santa Clara Superior Court	Complaint Filing Fee	\$435.00
3/4/2020	Legal Document Server, Inc.	Attorney Service	\$110.00
6/4/2020	Legal Document Server, Inc.	Attorney Service	\$16.50
6/4/2020	Santa Clara Superior Court	Stipulation & Order Fee	\$20.00
7/17/2020	Legal Document Server, Inc.	Attorney Service	\$16.72
7/17/2020	CourtCall, LLC	Attorney Service	\$94.00
8/5/2020	Legal Document Server, Inc.	Attorney Service	\$16.72
8/7/2020	General Logistics Systems US, Inc.	Courier Service	\$22.23
11/3/2020	General Logistics Systems US, Inc.	Courier Service	\$19.87
11/10/2020	General Logistics Systems US, Inc.	Courier Service	\$17.58
11/19/2020	General Logistics Systems US, Inc.	Courier Service	\$18.98
12/2/2020	Legal Document Server, Inc.	Attorney Service	\$16.72
12/8/2020	CourtCall, LLC	Attorney Service	\$94.00
12/16/2020	General Logistics Systems US, Inc.	Courier Service	\$17.47
1/4/2021	FedEx Express	Courier Service	\$22.76
1/14/2021	Legal Document Server, Inc.	Attorney Service	\$22.05
1/14/2021	Santa Clara Superior Court	Jury Fee	\$150.00
1/29/2021	General Logistics Systems US, Inc.	Courier Service	\$16.88
2/8/2021	File & ServeXpress	Attorney Service	\$127.56
2/8/2021	Santa Clara Superior Court	Motion Fee	\$60.00
2/16/2021	CourtCall, LLC	Attorney Service	\$94.00
4/8/2021	Legal Document Server, Inc.	Attorney Service	\$16.87
4/9/2021	CourtCall, LLC	Attorney Service	\$94.00
4/14/2021	File & ServeXpress	Attorney Service	\$22.00
8/6/2021	Legal Document Server, Inc.	Attorney Service	\$16.80
8/6/2021	CourtCall, LLC	Attorney Service	\$94.00
9/23/2021	General Logistics Systems US, Inc.	Courier Service	\$22.51
10/12/2021	FedEx Express	Courier Service	\$55.55
11/5/2021	General Logistics Systems US, Inc.	Courier Service	\$23.04
11/11/2021	General Logistics Systems US, Inc.	Courier Service	\$19.90

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Hayes vs. The Container Store, Inc.

11/23/2021	Legal Document Server, Inc.	Attorney Service	\$16.80
11/24/2021	CourtCall, LLC	Attorney Service	\$94.00
12/8/2021	Esquire Deposition Solutions, LLC	Court Reporter	\$927.60
2/25/2022	CourtCall, LLC	Attorney Service	\$94.00
3/23/2022	Esquire Deposition Solutions, LLC	Court Reporter	\$877.65
3/24/2022	CourtCall, LLC	Attorney Service	\$94.00
3/25/2022	Legal Document Server, Inc.	Attorney Service	\$16.80
4/8/2022	CourtCall, LLC	Attorney Service	\$94.00
4/8/2022	Legal Document Server, Inc.	Attorney Service	\$16.80
6/14/2022	FedEx Express	Courier Service	\$60.32
8/4/2022	U.S. Postmaster	Postage	\$216.00
8/5/2022	CourtCall, LLC	Attorney Service	\$94.00
12/2/2022	Legal Document Server, Inc.	Attorney Service	\$17.55
3/30/2023	Legal Document Server, Inc.	Attorney Service	\$17.55
4/4/2023	Legal Document Server, Inc.	Attorney Service	\$23.50
4/10/2023	Legal Document Server, Inc.	Attorney Service	\$61.59
4/10/2023	Santa Clara Superior Court	Motion Fee	\$120.00
4/12/2023	Legal Document Server, Inc.	Attorney Service	\$19.14
4/12/2023	Santa Clara Superior Court	Stipulation & Order Fee	\$20.00
4/17/2023	Legal Document Server, Inc.	Attorney Service	\$17.75
6/20/2023	Legal Document Server, Inc.	Attorney Service	\$17.75
6/29/2023	Legal Document Server, Inc.	Attorney Service	\$35.50
7/7/2023	Legal Document Server, Inc.	Attorney Service	\$17.75
7/31/2023	Legal Document Server, Inc.	Attorney Service	\$17.67
8/16/2023	Legal Document Server, Inc.	Attorney Service	\$17.67
11/13/2023	General Logistics Systems US, Inc.	Courier Service	\$59.36
1/22/2024	PAUL HASTINGS LLP	Mediation Fee	\$16,500.00
1/24/2024	Veritex	Court Reporter	\$1,963.88
2/29/2024	U.S. Postmaster	Postage	\$244.80
3/11/2024	PAUL HASTINGS LLP	Supplemental Mediation Fee	\$5,670.00
3/21/2024	Legal Document Server, Inc.	Attorney Service	\$17.67
10/11/2024	Legal Document Server, Inc.	Attorney Service	\$17.75
1/17/2025	FedEx Express	Courier Service	\$102.32
2/4/2025	Legal Document Server, Inc.	Attorney Service	\$20.20
9/10/2025	Legal Document Server, Inc.	Attorney Service	\$25.11
9/10/2025	Santa Clara Superior Court	Motion Fee	\$60.00

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Hayes vs. The Container Store, Inc.

1/12/2026	Legal Document Server, Inc.	Attorney Service	\$21.94
2/2/2026	Legal Document Server, Inc.	Attorney Service	\$21.94
2/5/2026	Legal Document Server, Inc.	Attorney Service	\$21.94
Total:			\$30,680.83