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Attorneys for Plaintiff Keith Williams
(Additional Plaintiff's counsel listed on next page)

SUPERIOR COURT OF CALIFORNIA

COUNTY OF ORANGE

KEITH WILLIAMS, on behalf of himself and
all other similarly situated and aggrieved
employees,

Plaintiff,

v.

ST. JOSPEH HEALTH PERSONAL CARE
SERVICES, LLC., ST. JOSEPH PERSONAL
CARE SERVICES, LLC., and DOES 1 to 100,
inclusive,

Defendants.

Case No. 30-2020-01134268-CU-OE-CXC
Assigned to: Hon. William Claster
Dept. CX104

**SUPPLEMENTAL DECLARATION OF
JOSEPH ANTONELLI IN SUPPORT OF
MOTION FOR COURT APPROVAL OF
PAGA SETTLEMENT**

Date: July 28, 2023
Time: 9:00 a.m.
Dept.: CX104
**Reservation No.: 30-2020-01134268-CU-OE-
CXC**

Complaint Filed: February 25, 2020
Trial Date: Vacated

MAYRA MIRANDA, ROBERT RASHAD,
CLAUDIA MORALES-ALVAREZ, DIANA
HOMER, DEBORAH MONTLE, individuals

Plaintiff,

v.

ST. JOSEPH HEALTH PERSONAL CARE
SERVICES, LLC., and DOES 1 to 100,

Defendants.

RELATED CASE NO. 30-2022-01270521-
CU-OE-CXC
Hon. Randall Sherman
Dept. CX105
Action Filed: July 18, 2022
Trial Date: None set

1 Joseph Antonelli, Esq. (Bar No. 137039)
2 **LAW OFFICE OF JOSEPH ANTONELLI**
3 14758 Pipeline Ave., Suite E, 2nd Floor
4 Chino Hills, CA 91709-6025
5 Tel.: (909) 393-0223 / Fax: (909) 393-0471

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10 Attorney for Plaintiff Keith Williams
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1 I, Joseph Antonelli, declare:

2 1. I am an attorney duly licensed to practice law in the State of California. I am the
3 senior partner at the Law Office of Joseph Antonelli, counsel for Plaintiffs herein. I have personal
4 knowledge of the matters set forth herein, and would and could testify thereto if called as a witness
5 herein.

6 2. This declaration shall serve as a supplement to the Declaration of Joseph Antonelli
7 filed with Plaintiff's Motion for Court Approval of PAGA Settlement, filed on July 6, 2023 and to
8 correct the inadvertent error of assigning the wrong cost exhibit. (See Notice of Errata filed
9 concurrently herewith)

10 **COSTS REQUEST**

11 3. Declarant is correcting the costs incurred by the Law Office of Joseph Antonelli,
12 which currently has incurred approximately \$5,921.45. A true and correct copy of the Law Office
13 of Joseph Antonelli Expense Detail Report dated July 6, 2023, is attached as **Exhibit 1**. The prior
14 exhibit and request were for a different case and was inadvertently included with my declaration
15 for this action and request for costs. Declarant is only seeking \$5,921.45 in costs to date on this
16 matter and not the \$9,593.34 amount that was inadvertently included with my July 6, 2023,
17 declaration.

18 4. With regard to Declarant's requests for costs, the costs requested are related to the
19 representation of the Plaintiff and are specifically itemized. I have reviewed each cost contained in
20 the cost bill and believe each cost was necessary and required in order to successfully prosecute
21 and litigate this matter. A majority of the costs are "hard" costs, meaning that they were incurred
22 and advanced by my office. A review of **Exhibit 1** reveals that all of the costs are "hard" costs. I
23 do not mark up or charge an increased rate for these costs, but am only seeking reimbursement for
24 actual costs for these services. There is no mark up on any of these hard costs nor is there any
25 administrative fee or interest charged on my billing.

26 There are no "soft costs" such as photocopies, facsimile or mileage was charged for any
27 travel. In fact, there is no mark up on any costs nor is there any administrative fee or interest
28 charged on my billing. Declarant claims that each expense that was incurred is reasonable and

1 necessary in the successful prosecution of this case and seeks reimbursement. I have reviewed
2 each cost entry and believe that each cost was necessary and reasonably expended for the
3 successful prosecution of this matter.

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

6 Executed on this 13th day of July 2023, at Chino Hills, California.

7
8 
9 Joseph Antonelli

Exhibit 1

Joseph Antonelli Law Office

14758 Pipeline Avenue
Suite E, 2nd Floor
Chino Hills, California
USA 91709

Williams

Date: July 6, 2023

Re: Williams v. St. Joseph Health Personal Care Services, LLC

Expenses

8/05/2020	Infinite Conferencing	-\$1.83
8/05/2020	Lexis Nexis	-\$137.19
9/13/2020	Infinite Conferencing	-\$0.66
10/17/2020	Courtcall	-\$94.00
10/17/2020	Lexis Nexis	-\$42.95
11/17/2020	One Legal	-\$12.20
12/06/2020	JT Calcs – Inv. 201114	-\$350.00
12/17/2023	AMK – Cert. transcript 11/18/2020	-\$1,169.00
1/05/2021	One Legal	-\$12.20
1/26/2021	FLC Split AMK transcript	\$701.58
2/04/2021	Video Solutions, LLC (Depo Denise Leger)	-\$300.00
2/12/2021	One Legal	-\$21.25
2/12/2021	One Legal	-\$21.25
2/12/2021	One Legal	-\$20.66
2/12/2021	One Legal	-\$23.25
2/12/2021	One Legal	-\$15.20
5/07/2021	Bill payment return (Video Solutions Inv. 3825)	\$300.00
7/04/2021	Lexis Nexis	-\$166.68
7/13/2021	Federal Express	-\$25.22
11/05/2021	Lexis Nexis	-\$21.62
1/05/2022	Lexis Nexis	-\$127.15
1/11/2022	Econe One (Inv. 21094)	-\$1,504.00
1/12/2023	Allman & Petersen (Inv. 8390)	-\$1,584.00
2/04/2023	Lexis Nexis	-\$58.30
3/06/2022	Lexis Nexis	-\$211.61
5/17/2022	Lexis Nexis	-\$165.69
8/03/2022	Lexis Nexis	-\$40.53
9/23/2022	Lexis Nexis	-\$40.53
9/26/2022	Lexis Nexis	-\$40.53
12/21/2022	Econ One Inv. 22990	-\$714.67

Total Out: **-\$6,923.03**
Transfers/Payments: \$1,001.58

TOTAL Expenses: \$5,921.45

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

I am employed in the County of San Bernardino, State of California. I am over the age of eighteen (18) and not a party to the within action; my business address is 14758 Pipeline Avenue, Suite E, Second Floor, Chino Hills, CA 91709-6025.

On July 13, 2023, I served the foregoing document described as:

SUPPLEMENTAL DECLARATION OF JOSEPH ANTONELLI IN SUPPORT OF MOTION FOR COURT APPROVAL OF PAGA SETTLEMENT

on INTERESTED PARTIES in this action as stated below:

Derek Havel, Esq.
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Calabasas, CA 91302

XX BY E-MAIL: I electronically served the above-mentioned document to each of the recipients at their respective e-mail addresses. My e-mail address is:
Jerin@JanelleCarneyLaw.com.

Executed on July 13, 2023, at Chino Hills, California.

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



Jerin Wilkinson