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Attorneys for Plaintiff and the Class

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

VICTORIA TICE, as an individual and on  
behalf of all others similarly situated,

Plaintiff,

vs.

TRADER JOE'S COMPANY, a California  
corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Case No. 20CV00892

[Assigned to the Honorable Thomas P. Anderle,  
Department 3]

**DECLARATION OF MAX W. GAVRON IN  
SUPPORT OF PLAINTIFF'S MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT**

Date: September 6, 2023

Time: 10:00 A.M.

Dept.: 3

Complaint Filed: February 14, 2020

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I, Max W. Gavron, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Diversity Law Group, counsel of record for Named Plaintiff Victoria Tice (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. The proposed settlement meets the criteria for this Court to grant final approval of this matter on a class-wide basis, as the settlement is fair, adequate, and reasonable.

3. The Joint Stipulation of Class Action Settlement (“Settlement Agreement”) was the product of arm’s-length negotiations between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed. Class Counsel conducted significant investigation in this case, including formal and informal discovery and significant exchanges of information regarding class data for the entire class, as well as documents and information pertaining to Defendant Trader Joe’s Company’s (“Defendant”) policies and practices regarding payment of final wages and use of paycards. The Parties also participated in a full day of mediation with a highly experienced and well-known mediator, Gig Kyriacou, Esq., which did not result in settlement.

4. In connection with mediation, the Parties also conducted informal discovery and significant exchanges of information before mediation regarding class data for the entire class, as well as policy documents and information pertaining to Defendant's policies and practices regarding payment of final wages. The exchange of informal discovery allowed Class Counsel to analyze Defendant's liability and exposure. Following the failed mediation, the Parties continued to heavily litigate the issues and ultimately arrived at a settlement through continued discussions with Mr. Kyriacou.

5. I have spent significant time researching and pursuing the claims that have been alleged in this action. Based on my independent investigations and evaluations, I am of the opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Class Members, in light of all known facts and circumstances, and the expenses and risks

1 inherent in litigation. The settlement was negotiated at arm's-length and was facilitated by an  
2 experienced and neutral mediator. Thus, this settlement should be granted final approval.

3         6.       There were no objections to the amount of attorneys' fees or litigation costs that  
4 Class Counsel seeks in this case and for which Plaintiff asks the Court for final approval.

5         7.       My qualifications are as follows: I received a full-tuition scholarship, and  
6 graduated from Southwestern Law School in 2013, magna cum laude. I was in the top 5% of my  
7 class. During my time at Southwestern, I was a Notes and Comments Editor on the Southwestern  
8 Law Review. I also received awards for achieving the highest grade in my class in several  
9 courses. In 2012, I was a full-time extern, at the United States District Court for the Central  
10 District. Immediately after law school, I taught several courses at Southwestern, including  
11 Principles of Legal Analysis and Legal Methods. I taught those courses for approximately four  
12 years.

13         8.       I practiced civil litigation at Haight Brown & Bonesteel LLP from approximately  
14 September 2013, through January 2016. I was third-chair in a federal court jury trial that resulted  
15 in a defense verdict in our client's favor on a \$21 million commercial breach of contract dispute.  
16 I also regularly litigated cases across the civil litigation spectrum, including employment matters.

17         9.       From February 2016, through Fall 2017, I practiced at the international law firm  
18 of Arnold & Porter, which had recently merged with Kaye Scholer, LLP. I defended Fortune 50  
19 companies in Multi-District Litigation primarily in the product liability sphere. I also  
20 successfully drafted an appellate brief in the Ninth Circuit resulting in the reversal of a summary  
21 judgment decision regarding trade secret issues, which resulted in a published opinion. *See*  
22 *Experian Information Solutions, Inc. v. Nationwide Marketing Services Incorporated*, 893 F.3d  
23 1176 (9th Cir. 2018). I also worked in several other practice groups. While working at Arnold &  
24 Porter, the firm routinely billed for my services at rates ranging from \$375 to \$550 per hour.

25         10.      From September 2017, through September 2018, I served as a law clerk to a  
26 Judge sitting on the United States District Court, Central District of California. I regularly  
27 prepared bench memoranda, on cases involving all types of civil litigation, including regularly  
28 working on wage and hour class actions.

11. I am currently an associate at the law firm Diversity Law Group, P.C., an employment law firm that has handled numerous wage and hour class and individual actions, on both plaintiff and defense sides. My current practice focuses on employment matters involving both class actions, and single plaintiffs. The firm currently has cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the San Diego County Superior Courts, and the United States District Courts for the Central, Northern, and Eastern Districts of California. I am currently handling or have handled numerous wage and hour class action lawsuits with the firm, including, but not limited to: *Agar v. Sensient Natural Ingredients, LLC* (Case No. CV-19-001906, Stanislaus County Superior Court); *Cunningham, et al. v. Diverse Business Solutions* (Case No. CIVDS1817095, San Bernardino County Superior Court); *Heredia v. Eddie Bauer LLC* (Case No. 16CV300475, United States District Court, Northern District of California); *Parsons v. Estenson Logistics, LLC* (Case No. 34-2019-00252929, Sacramento County Superior Court); *Wood v. Reeve Trucking Co., Inc.* (Case No. STK-CV-UOE-2018-0004414, San Joaquin County Superior Court); and *Coronel v. Pinnacle Agriculture* (Case No. 18CV004287, Monterey County Superior Court).

12. I have been certified as class counsel in a number of cases, including *Smith v. Gold Country Health Center, Inc.* (Case No. PC20180491, El Dorado County Superior Court); *Pantoja v. RAMCO Enterprises, L.P.* (Case No. M126835, Monterey County Superior Court); *Abernathy v. Deacon Construction, LLC* (Case No. 20CV367327, Santa Clara Superior Court) (December 16, 2022). I have also assisted in numerous wage and hour class action mediations.

13. On June 14, 2019, I argued two related class action cases in front of the Ninth Circuit Court of Appeals. One of them was *Rodriguez v Nike Retail Service Inc.*, Case No. 17-16866. On June 28, 2019, the Ninth Circuit issued its order reversing the district court's grant of summary judgment and remanding in favor of our clients. *Rodriguez v. Nike Retail Servs., Inc.*, 928 F.3d 810 (9th Cir. 2019).

14. To date, I have incurred approximately 282.9 hours in connection with the litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred to date.

1           15.     I have been approved at \$600.00 per hour in *Weybrew v. BEI Construction*,  
2 Solano County Superior Court Case No. FCS055658 (January 14, 2022), *In re See's Candies*  
3 *Wage and Hour Cases*, Case No. JCCP5004 (March 30, 2022), Los Angeles Superior Court,  
4 *Pevey v. Lumber City Corp*, San Bernardino County Superior Court Case No. CIVDS2010240  
5 (May 2, 2022), *Ross v Stater Bros. Markets*, San Bernardino County Superior Court Case No.  
6 CIVDS1902518 (September 8, 2022), and *Schneider v. Amazon Retail LLC*, Los Angeles County  
7 Superior Court Case No. 21STCV26226 (December 1, 2022). Prior to that, throughout 2020 and  
8 2021, I was approved at an hourly rate of at \$550.00 per hour in *James v RADC Enterprises*,  
9 *Inc.*, San Bernardino County Superior Court, Case No. CIV-DS1933035 (September 29, 2020),  
10 *Hector Luna v. Triple Canopy, Inc.*, Santa Clara County Superior Court, Case No. 19CV345169  
11 (October 22, 2020), *Melbert Magpugay v. Harbor Electronics, Inc.*, Santa Clara County Superior  
12 Court Case No. 19CV352547 (January 27, 2021), *Foster v. Schindler Elevator Corp.*, Alameda  
13 County Superior Court Case no. RG19029640 (March 2, 2021), *Martin v. Streetplus Company*,  
14 *LLC, et al*, Los Angeles Superior Court Case No. 19STCV15522 (July 13, 2021), *Morris v. Blue*  
15 *Mountain Enterprises, LLC*, Solano County Superior Court, Case No. FCS05.858 (August 4,  
16 2021).

17           16.     In addition to the hours above, I also anticipate spending an additional 10 hours  
18 through the completion of this case to handle any post-final approval and settlement matters,  
19 including communications with the Settlement Administrator and/or any potential issues related  
20 to payments from the Settlement Administrator and any other related issues.

21           17.     Thus, I anticipate the total amount of my fees incurred in this case to be  
22 approximately \$175,740.00 based on 292.9 total hours, which includes 10 anticipated hours, at  
23 an hourly rate of \$600.00 per hour. Here, Plaintiff's counsel's lodestar exceeds the fees  
24 requested (\$204,460.00 lodestar compared to \$113,333.33 fees requested). Accordingly, the  
25 Court would need to apply a negative multiplier of 0.55 ( $\$113,333.33 / \$204,460.00$ ) to arrive at  
26 the requested fees.

27           18.     My office has incurred costs in the amount of \$52,386.08. The costs are all  
28 litigation related costs. Attached hereto as **Exhibit B** is copy of the costs incurred in the

1 prosecution of this lawsuit. While this amount may be greater than a typical wage and hour  
2 settlement, the costs were necessary to achieve this result as demonstrated by the motion practice  
3 surrounding Plaintiff's subpoena to obtain data from Comdata regarding fees incurred by  
4 putative class members and/or aggrieved employees.

5 19. Concurrent with the filing of Plaintiff's Motion, my office uploaded a copy of the  
6 Motion to the website of the Labor and Workforce Development Agency. Attached hereto as  
7 **Exhibit C** is a true and correct copy of the submission confirmation.

8 20. Any remaining monies from uncashed settlement checks will be redistributed to  
9 the designated *cy pres* recipient State Bar Justice Gap Fund. I do not have any conflicts of  
10 interest with this proposed recipient.

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

13 Executed on this 14<sup>th</sup> day of August 2023, at Los Angeles, California.

14   
15 \_\_\_\_\_  
16 Max W. Gavron

# EXHIBIT A

***Tice v. Trader Joe's Company***  
**Time and Task Chart for Max W. Gavron**

| Hours | Description of Work                                                                                                                                                                                                                                                                    |
|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10.9  | Factual investigation, review of file and client documents and paystubs, draft and revise PAGA letter.                                                                                                                                                                                 |
| 6.1   | Legal research re viability of claim for waiting time penalties premised on Labor Code § 203 where employer provides final wages by paycard without prior authorization.                                                                                                               |
| 1.9   | Draft and revise complaint                                                                                                                                                                                                                                                             |
| 1.1   | Meet and confer with opposing counsel upon receipt of responsive pleading; confer with co-counsel re same.                                                                                                                                                                             |
| 2.5   | Draft and revise first set of discovery to Defendant.                                                                                                                                                                                                                                  |
| 6.7   | Analyze and review responses to written discovery from Defendant; meet and confer re same; draft and revise meet and confer correspondence.                                                                                                                                            |
| 7.2   | Analyze and review further responses to written discovery received following meet and confer efforts; further meet and confer to obtain 2nd supplemental responses from Defendant to RFPs and Special Interrogatories; analyze, review, and summarize Defendant's document production. |
| 11.3  | Analyze and review discovery propounded on Plaintiff; confer with Plaintiff re same; draft and revise responses; analyze, review, and collect documents for production in response to written discovery.                                                                               |
| 3.9   | Draft and revise requests for data and information in advance of mediation; review file and confer with client re same to prepare requests.                                                                                                                                            |
| 6.8   | Draft and revise mediation brief; review and analyze data and policies provided by Defendant in advance of mediation.                                                                                                                                                                  |
| 8.1   | Prepare for and participate in mediation, which did not result in settlement.                                                                                                                                                                                                          |
| 1.2   | Draft and revise deposition notice for person most qualified deposition.                                                                                                                                                                                                               |
| 8.3   | Draft and revise deposition outline for person most qualified; analyze and review documents and discovery responses in preparation for same; confer with co-counsel re same.                                                                                                           |
| 7.9   | Prepare for and depose Defendant's person most qualified; confer with co-counsel re deposition and strategy moving forward in light of testimony.                                                                                                                                      |
| 1.7   | Draft and revise second set of written discovery considering testimony; confer with co-counsel re same.                                                                                                                                                                                |
| 5.9   | Analyze and review notice of deposition of Plaintiff; confer with client re same; meet with client to prepare for deposition; review documents and discovery in preparation for same.                                                                                                  |
| 7.1   | Defend Plaintiff's deposition; confer with client and co-counsel following same.                                                                                                                                                                                                       |

|      |                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 38.3 | Draft and revise motion for class certification and supporting documents; review Defendant's opposition to same; conduct legal research; draft and revise reply in support of same; confer with co-counsel re same.                                                                                                                                                                                                 |
| 3.1  | Prepare for and appear at hearing on class certification; review court's tentative ruling re same.                                                                                                                                                                                                                                                                                                                  |
| 24.5 | Analyze, review, and research Defendant's Motion to Strike PAGA claim; draft and revise opposition to motion to strike PAGA claim and supporting documents; conduct legal research; confer with co-counsel re same.                                                                                                                                                                                                 |
| 1.9  | Prepare for and appear at hearing on motion to strike PAGA claim; review court's tentative ruling re same.                                                                                                                                                                                                                                                                                                          |
| 1.6  | Draft and revise third set of written discovery to Defendant.                                                                                                                                                                                                                                                                                                                                                       |
| 28.9 | Meet and confer re responses to third set of discovery; draft and revise motion to compel third set of special interrogatories and supporting documents; analyze and review Defendant's opposition and supporting documents; draft and revise reply in support of same.                                                                                                                                             |
| 18.2 | Draft and revise subpoena to Comdata to obtain records regarding fees incurred by aggrieved employees; meet and confer with counsel for Comdata and Defendant re same; draft correspondence detailing proposed solutions to objections and anticipated motion to quash.                                                                                                                                             |
| 3.3  | Draft and revise joint IDC statement re Comdata subpoena; confer with defense counsel re same; participate in conference with court.                                                                                                                                                                                                                                                                                |
| 17.4 | Analyze, review, and research Defendant's Motion to Quash; draft and revise opposition to same; analyze and review reply filed by Defendant; prepare for and attend hearing re same.                                                                                                                                                                                                                                |
| 2.3  | Analyze and review Court's order granting motion to quash subpoena to Comdata; strategize with co-counsel next steps considering same.                                                                                                                                                                                                                                                                              |
| 8.9  | Confer with third-party administrator to distribute notice to consumer to aggrieved employees in conjunction with second subpoena to Comdata to obtain data re potential fees incurred by aggrieved employees; draft and revise cover letter and notice to consumer to be duplicated for all aggrieved employees; respond to communications from aggrieved employees following distribution of notices to consumer. |
| 4.2  | Engage in continued discussions with mediator to try and resolve case; confer with defense counsel re additional data needed to consider settlement.                                                                                                                                                                                                                                                                |
| 6.8  | Draft and revise settlement agreement; confer with defense counsel re same; confer with co-counsel re same.                                                                                                                                                                                                                                                                                                         |
| 8.5  | Draft and revise motion for preliminary approval and supporting documents; confer with co-counsel and defense counsel re same; prepare for and attend hearing on Motion for Preliminary Approval.                                                                                                                                                                                                                   |

|                     |                                                                                                                                                                          |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10.2                | Confer with settlement administrator re distribution of class notice; respond to inquiries from settlement class members re notice and proposed settlement.              |
| 6.2                 | Draft motion for final approval of settlement, proposed order, and supporting documents; further revise same; confer with co-counsel and opposing counsel regarding same |
| <b><u>282.9</u></b> | <b><u>TOTAL HOURS</u></b>                                                                                                                                                |

# EXHIBIT B

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DIVERSITY LAW GROUP  
Slip Listing

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Selection Criteria

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Slip.Classification Open  
Client (hand select) Include: Tice, Victoria v. Trader Joe's  
Slip.Transaction Ty 2 - 2

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Rate Info - identifies rate source and level

| Slip ID                              |     | Timekeeper                     | Units     | Rate        | Slip Value |
|--------------------------------------|-----|--------------------------------|-----------|-------------|------------|
| Dates and Time                       |     | Activity                       | DNB Time  | Rate Info   |            |
| Posting Status                       |     | Client                         | Est. Time | Bill Status |            |
| Description                          |     | Reference                      | Variance  |             |            |
| 61576                                | EXP | Olympia                        | 1         | 1483.20     | 1483.20    |
| 2/14/2020                            |     | Court fees                     |           |             |            |
| WIP                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Complaint                  |     |                                |           |             |            |
| 61586                                | EXP | Olympia                        | 1         | 5.15        | 5.15       |
| 2/19/2020                            |     | Court fees                     |           |             |            |
| WIP                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - 170.6                      |     |                                |           |             |            |
| 61739                                | EXP | Olympia                        | 1         | 70.24       | 70.24      |
| 2/19/2020                            |     | Atty Service                   |           |             |            |
| WIP                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Complaint Service |     |                                |           |             |            |
| 61639                                | EXP | Olympia                        | 1         | 5.15        | 5.15       |
| 2/26/2020                            |     | Court fees                     |           |             |            |
| WIP                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - POS of Summons             |     |                                |           |             |            |
| 61923                                | EXP | Olympia                        | 1         | 7.40        | 7.40       |
| 2/28/2020                            |     | Postage                        |           |             |            |
| WIP                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Postage                              |     |                                |           |             |            |
| 61755                                | EXP | Olympia                        | 1         | 5.15        | 5.15       |
| 3/10/2020                            |     | Court fees                     |           |             |            |
| WIP                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Notice of Reassignment     |     |                                |           |             |            |
| 62049                                | EXP | Olympia                        | 5         | 0.25        | 1.25       |
| 3/31/2020                            |     | Photocopies                    |           |             |            |
| WIP                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Photocopies                          |     |                                |           |             |            |
| 62050                                | EXP | Olympia                        | 1         | 0.50        | 0.50       |
| 3/31/2020                            |     | Postage                        |           |             |            |
| WIP                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Postage                              |     |                                |           |             |            |

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DIVERSITY LAW GROUP  
Slip Listing

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| Slip ID                                                   |     | Timekeeper                     | Units     | Rate        | Slip Value |
|-----------------------------------------------------------|-----|--------------------------------|-----------|-------------|------------|
| Dates and Time                                            |     | Activity                       | DNB Time  | Rate Info   |            |
| Posting Status                                            |     | Client                         | Est. Time | Bill Status |            |
| Description                                               |     | Reference                      | Variance  |             |            |
| 62562                                                     | EXP | Olympia                        | 13        | 0.25        | 3.25       |
| 4/30/2020                                                 |     | Photocopies                    |           |             |            |
| WIP                                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Photocopies                                               |     |                                |           |             |            |
| 62563                                                     | EXP | Olympia                        | 1         | 0.80        | 0.80       |
| 4/30/2020                                                 |     | Postage                        |           |             |            |
| WIP                                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Postage                                                   |     |                                |           |             |            |
| 62769                                                     | EXP | Olympia                        | 1         | 5.15        | 5.15       |
| 6/8/2020                                                  |     | Court fees                     |           |             |            |
| WIP                                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - CMS                                             |     |                                |           |             |            |
| 64942                                                     | EXP | Olympia                        | 1         | 7500.00     | 7500.00    |
| 11/10/2020                                                |     | Arbitrators                    |           |             |            |
| WIP                                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Gig Kyriacou Mediation                                    |     |                                |           |             |            |
| 66597                                                     | EXP | Olympia                        | 1         | 5.15        | 5.15       |
| 3/22/2021                                                 |     | Court fees                     |           |             |            |
| WIP                                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - CMS                                             |     |                                |           |             |            |
| 66933                                                     | EXP | Olympia                        | 2         | 25.75       | 51.50      |
| 4/16/2021                                                 |     | Court fees                     |           |             |            |
| WIP                                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Stip to Continue Motion for Class Certification |     |                                |           |             |            |
| 66942                                                     | EXP | Olympia                        | 2         | 5.15        | 10.30      |
| 4/19/2021                                                 |     | Court fees                     |           |             |            |
| WIP                                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Notice of Entry of Order                        |     |                                |           |             |            |
| 67543                                                     | EXP | Olympia                        | 1         | 1504.70     | 1504.70    |
| 6/8/2021                                                  |     | Transcript/DEP                 |           |             |            |
| WIP                                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Litigation Services - Deposition Transcript of PMK        |     |                                |           |             |            |
| 67624                                                     | EXP | Erika Mejia                    | 1         | 97.85       | 97.85      |
| 6/22/2021                                                 |     | Court fees                     |           |             |            |
| WIP                                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Motion for Class Certification                  |     |                                |           |             |            |
| 67625                                                     | EXP | Erika Mejia                    | 1         | 5.15        | 5.15       |
| 6/22/2021                                                 |     | Court fees                     |           |             |            |
| WIP                                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Proposed Order re Motion for                    |     |                                |           |             |            |

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DIVERSITY LAW GROUP  
Slip Listing

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| Slip ID                                   |     | Timekeeper                     | Units     | Rate        | Slip Value |
|-------------------------------------------|-----|--------------------------------|-----------|-------------|------------|
| Dates and Time                            |     | Activity                       | DNB Time  | Rate Info   |            |
| Posting Status                            |     | Client                         | Est. Time | Bill Status |            |
| Description                               |     | Reference                      | Variance  |             |            |
| <hr/>                                     |     |                                |           |             |            |
| 67635                                     | EXP | Erika Mejia                    | 1         | 5.15        | 5.15       |
| 6/22/2021                                 |     | Court fees                     |           |             |            |
| WIP                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Proposed Order re MCC           |     |                                |           |             |            |
| 67744                                     | EXP | Olympia                        | 1         | 889.88      | 889.88     |
| 6/30/2021                                 |     | Transcript/DEP                 |           |             |            |
| WIP                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Abrams, Mah & Kahn Reporting - Deposition |     |                                |           |             |            |
| Transcript of Victoria A. Tice            |     |                                |           |             |            |
| 68587                                     | EXP | Erika Mejia                    | 1         | 5.15        | 5.15       |
| 8/20/2021                                 |     | Court fees                     |           |             |            |
| WIP                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Reply iso Class Cert            |     |                                |           |             |            |
| 69759                                     | EXP | Christine S. Lee               | 1         | 25.75       | 25.75      |
| 11/19/2021                                |     | Court fees                     |           |             |            |
| WIP                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Stip re RFP                     |     |                                |           |             |            |
| 69818                                     | EXP | Linda Lee                      | 1         | 5.15        | 5.15       |
| 11/30/2021                                |     | Court fees                     |           |             |            |
| WIP                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Decl of MG iso Request for IDC  |     |                                |           |             |            |
| 70060                                     | EXP | Olympia                        | 258       | 0.25        | 64.50      |
| 11/30/2021                                |     | Photocopies                    |           |             |            |
| WIP                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Photocopies                               |     |                                |           |             |            |
| 69831                                     | EXP | Olympia                        | 2         | 5.15        | 10.30      |
| 12/1/2021                                 |     | Court fees                     |           |             |            |
| WIP                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Oppo to Motion to Strike        |     |                                |           |             |            |
| 69893                                     | EXP | Olympia                        | 1         | 31.23       | 31.23      |
| 12/1/2021                                 |     | Delivery serv                  |           |             |            |
| WIP                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Federal Express                           |     |                                |           |             |            |
| 70103                                     | EXP | Olympia                        | 1         | 97.85       | 97.85      |
| 12/13/2021                                |     | Court fees                     |           |             |            |
| WIP                                       |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - MTC                             |     |                                |           |             |            |

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| Slip ID                                |           | Timekeeper                     | Units     | Rate        | Slip Value |
|----------------------------------------|-----------|--------------------------------|-----------|-------------|------------|
| Dates and Time                         |           | Activity                       | DNB Time  | Rate Info   |            |
| Posting Status                         |           | Client                         | Est. Time | Bill Status |            |
| Description                            |           | Reference                      | Variance  |             |            |
| 70163                                  | EXP       | Linda Lee                      | 1         | 46.35       | 46.35      |
| 12/23/2021                             |           | Court fees                     |           |             |            |
| WIP                                    |           | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Stip re MTC                  |           |                                |           |             |            |
| 70411                                  | EXP       | Olympia                        | 1         | 5.15        | 5.15       |
| 1/13/2022                              |           | Court fees                     |           |             |            |
| WIP                                    |           | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Notice of CMC & Trial        |           |                                |           |             |            |
| 70535                                  | EXP       | Linda Lee                      | 1         | 5.15        | 5.15       |
| 2/1/2022                               |           | Court fees                     |           |             |            |
| WIP                                    |           | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Reply iso MTC                |           |                                |           |             |            |
| 72318                                  | EXP       | Olympia                        | 1         | 62.86       | 62.86      |
| 6/1/2022                               |           | Delivery serv                  |           |             |            |
| WIP                                    |           | Tice, Victoria v. Trader Joe's |           |             |            |
| Federal Express                        |           |                                |           |             |            |
| 72319                                  | EXP       | Olympia                        | 1         | 54.24       | 54.24      |
| 6/1/2022                               |           | Delivery serv                  |           |             |            |
| WIP                                    |           | Tice, Victoria v. Trader Joe's |           |             |            |
| Federal Express                        |           |                                |           |             |            |
| 72383                                  | EXP       | Linda Lee                      | 1         | 142.54      | 142.54     |
| 6/8/2022                               |           | Atty Service                   |           |             |            |
| WIP                                    |           | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Deposition Subpoena |           |                                |           |             |            |
| 72173                                  | EXP       | Olympia                        | 1         | 5.15        | 5.15       |
| 6/9/2022                               |           | Court fees                     |           |             |            |
| WIP                                    |           | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - CMS                          |           |                                |           |             |            |
| 72803                                  | EXP       | Erika Mejia                    | 1         | 5.15        | 5.15       |
| 8/18/2022                              |           | Court fees                     |           |             |            |
| WIP                                    |           | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Oppo to Mtn to Quash         |           |                                |           |             |            |
| 72822                                  | EXP       | Olympia                        | 1         | 35.00       | 35.00      |
| 8/22/2022                              |           | Atty Service                   |           |             |            |
| WIP                                    |           | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service                       |           |                                |           |             |            |
| 73303                                  | EXP       | Linda Lee                      | 6         | 56.50       | 339.00     |
| 9/22/2022                              | 9/23/2022 | Atty Service                   |           |             |            |
| WIP                                    |           | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Depo Subpoena       |           |                                |           |             |            |

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| Slip ID                             |     | Timekeeper                     | Units     | Rate        | Slip Value |
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| Dates and Time                      |     | Activity                       | DNB Time  | Rate Info   |            |
| Posting Status                      |     | Client                         | Est. Time | Bill Status |            |
| Description                         |     | Reference                      | Variance  |             |            |
| 73305                               | EXP | Linda Lee                      | 1         | 56.50       | 56.50      |
| 9/23/2022                           |     | Atty Service                   |           |             |            |
| WIP                                 |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Depo Subpoena    |     |                                |           |             |            |
| 73803                               | EXP | Olympia                        | 1         | 62.00       | 62.00      |
| 9/23/2022                           |     | Atty Service                   |           |             |            |
| WIP                                 |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Depo Subpoena    |     |                                |           |             |            |
| 73491                               | EXP | Linda Lee                      | 1         | 115.94      | 115.94     |
| 9/23/2022                           |     | Atty Service                   |           |             |            |
| WIP                                 |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Depo Subpoena    |     |                                |           |             |            |
| 73308                               | EXP | Linda Lee                      | 50        | 59.00       | 2950.00    |
| 9/23/2022                           |     | Atty Service                   |           |             |            |
| WIP                                 |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Depo Subpoena re |     |                                |           |             |            |
| Comdata, Inc.                       |     |                                |           |             |            |
| 73306                               | EXP | Linda Lee                      | 10        | 59.00       | 590.00     |
| 9/23/2022                           |     | Atty Service                   |           |             |            |
| WIP                                 |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Depo Subpoena re |     |                                |           |             |            |
| Comdata, Inc.                       |     |                                |           |             |            |
| 73307                               | EXP | Linda Lee                      | 1         | 56.50       | 56.50      |
| 9/23/2022                           |     | Atty Service                   |           |             |            |
| WIP                                 |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Depo Subpoena re |     |                                |           |             |            |
| Comdata, Inc.                       |     |                                |           |             |            |
| 73304                               | EXP | Linda Lee                      | 17        | 59.00       | 1003.00    |
| 9/23/2022                           |     | Atty Service                   |           |             |            |
| WIP                                 |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Depo Subpoena    |     |                                |           |             |            |
| 73302                               | EXP | Linda Lee                      | 2         | 66.50       | 133.00     |
| 9/23/2022                           |     | Atty Service                   |           |             |            |
| WIP                                 |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Depo Subpoena    |     |                                |           |             |            |
| 73301                               | EXP | Linda Lee                      | 258       | 59.00       | 15222.00   |
| 9/23/2022                           |     | Atty Service                   |           |             |            |
| WIP                                 |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Depo Subpoena re |     |                                |           |             |            |
| Comdata, Inc.                       |     |                                |           |             |            |

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| Slip ID                                              |     | Timekeeper                     | Units     | Rate        | Slip Value |
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| Dates and Time                                       |     | Activity                       | DNB Time  | Rate Info   |            |
| Posting Status                                       |     | Client                         | Est. Time | Bill Status |            |
| Description                                          |     | Reference                      | Variance  |             |            |
| 73300                                                | EXP | Linda Lee                      | 1         | 115.94      | 115.94     |
| 9/23/2022                                            |     | Atty Service                   |           |             |            |
| WIP                                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service - Depo Subpoena re Comdata, Inc.    |     |                                |           |             |            |
| 73130                                                | EXP | Valeria Tril                   | 1         | 5.15        | 5.15       |
| 9/29/2022                                            |     | Court fees                     |           |             |            |
| WIP                                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - CMS                                        |     |                                |           |             |            |
| 73438                                                | EXP | Olympia                        | 1         | 2000.00     | 2000.00    |
| 10/31/2022                                           |     | Arbitrators                    |           |             |            |
| WIP                                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Gig Kyriacou Mediation                               |     |                                |           |             |            |
| 73452                                                | EXP | Olympia                        | 1         | 2104.75     | 2104.75    |
| 11/2/2022                                            |     | Other expenses                 |           |             |            |
| WIP                                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Phoenix Class Action Administration - Belaire Notice |     |                                |           |             |            |
| 73453                                                | EXP | Olympia                        | 1         | 2798.16     | 2798.16    |
| 11/2/2022                                            |     | Other expenses                 |           |             |            |
| WIP                                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Phoenix Class Action Administration - Subpoena       |     |                                |           |             |            |
| 73902                                                | EXP | Olympia                        | 1         | 5.15        | 5.15       |
| 12/20/2022                                           |     | Court fees                     |           |             |            |
| WIP                                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Notice of Settlement                       |     |                                |           |             |            |
| 74038                                                | EXP | Olympia                        | 348       | 35.00       | 12180.00   |
| 1/10/2023                                            |     | Atty Service                   |           |             |            |
| WIP                                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Attorney Service                                     |     |                                |           |             |            |
| 74309                                                | EXP | Olympia                        | 2         | 5.15        | 10.30      |
| 2/1/2023                                             |     | Court fees                     |           |             |            |
| WIP                                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Notice of Settlement                       |     |                                |           |             |            |
| 74310                                                | EXP | Olympia                        | 1         | 5.15        | 5.15       |
| 2/2/2023                                             |     | Court fees                     |           |             |            |
| WIP                                                  |     | Tice, Victoria v. Trader Joe's |           |             |            |
| Odyssey - Notice of Settlement                       |     |                                |           |             |            |

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| Slip ID                                       |     | Timekeeper                     | Units      | Rate        | Slip Value |
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| Dates and Time                                |     | Activity                       | DNB Time   | Rate Info   |            |
| Posting Status                                |     | Client                         | Est. Time  | Bill Status |            |
| Description                                   |     | Reference                      | Variance   |             |            |
| 74663                                         | EXP | Erika Mejia                    | 1          | 66.95       | 66.95      |
| 3/10/2023                                     |     | Court fees                     |            |             |            |
| WIP                                           |     | Tice, Victoria v. Trader Joe's |            |             |            |
| Odyssey - MPA                                 |     |                                |            |             |            |
| 74668                                         | EXP | Erika Mejia                    | 1          | 97.85       | 97.85      |
| 3/13/2023                                     |     | Court fees                     |            |             |            |
| WIP                                           |     | Tice, Victoria v. Trader Joe's |            |             |            |
| Odyssey - MPA                                 |     |                                |            |             |            |
| 74918                                         | EXP | Erika Mejia                    | 1          | 5.15        | 5.15       |
| 4/18/2023                                     |     | Court fees                     |            |             |            |
| WIP                                           |     | Tice, Victoria v. Trader Joe's |            |             |            |
| Odyssey - Decl of MG iso MPA                  |     |                                |            |             |            |
| 75132                                         | EXP | Erika Mejia                    | 1          | 5.15        | 5.15       |
| 5/16/2023                                     |     | Court fees                     |            |             |            |
| WIP                                           |     | Tice, Victoria v. Trader Joe's |            |             |            |
| Odyssey - Proposed Amended Order Granting MPA |     |                                |            |             |            |
| 75873                                         | EXP | Max Gavron                     | 1          | 200.00      | 200.00     |
| 8/8/2023                                      |     | Court fees                     |            |             |            |
| WIP                                           |     | Tice, Victoria v. Trader Joe's |            |             |            |
| MFA Filing Fees                               |     |                                |            |             |            |
| Grand Total                                   |     |                                |            |             |            |
|                                               |     |                                | Billable   | 0.00        | 52386.08   |
|                                               |     |                                | Unbillable | 0.00        | 0.00       |
|                                               |     |                                | Total      | 0.00        | 52386.08   |

# EXHIBIT C