

WINSTON LAW GROUP, P.C.

David S. Winston, Esq. CA Bar No. 301667
david@employmentlitigators.com
1180 South Beverly Drive, Suite 320
Los Angeles, California 90035
Phone: (424) 288-4568
Fax: (424) 532-4062

Attorney for Plaintiff and the aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN BERNARDINO

LATOIA SMITH, an individual, and RAYMOND JONES, an individual on behalf of the State of California, as private attorney generals,

,
Plaintiff,
v.

BURLINGTON MERCHANDISING CORPORATION, a Delaware Corporation;
BURLINGTON COAT FACTORY DIRECT CORPORATION, a New Jersey Corporation;
BURLINGTON DISTRIBUTION CORP., a Delaware Corporation; and DOES 3-50, inclusive,

Defendants.

Case No. CIVDS1929684

[Assigned for all purposes to the Hon. David Cohn, Dept. S26]

**DECLARATION OF DAVID S. WINSTON
IN SUPPORT OF APPROVAL OF PAGA
SETTLEMENT**

Date: October 23, 2020
Time: 10:00 am

Complaint Filed: October 3, 2019
Trial Date: None Set

JASMINE SPIVEY, on behalf of herself and all others similarly situated, and on behalf of the general public

Plaintiff,
v.

BURLINGTON COAT FACTORY OF TEXAS, INC.; BURLINGTON COAT FACTORY WAREHOUSE CORPORATION; and DOES 1-100,

Defendants.

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1. I am an attorney licensed to practice before all of the courts of the State of California. I am the attorney of record for Plaintiffs Latoia Smith and Raymond Jones in the above-entitled action. I have personal knowledge of the facts set forth herein, and if called upon as a witness, I could and would testify competently thereto.

THE EXPERIENCE AND VIEWS OF PAGA COUNSEL

3. Prior to starting the Winston Law Group, P.C. in 2017, I regularly litigated class and representative PAGA actions as an Associate at Kingsley & Kingsley, represented employers in class, representative, and individual actions for Lewis Brisbois Bisgaard & Smith, and managed PAGA cases for one of the top 10 companies in the Fortune 500 while at Burke, Williams, & Sorensen, LLP.

4. Although PAGA Counsel's adequacy is not an issue that a court may consider in a PAGA action,¹ I also have significant experience with PAGA litigation having briefed PAGA issues before the California Court of Appeal several times including in *Anaya v. J's Maint. Serv., Inc.*, No. B261662, 2016 WL 519867 (Cal. Ct. App. Feb. 9, 2016) and the appellant's brief in *Lopez v. Friant & Assocs., LLC*, 15 Cal.App.5th 773, 788 (2017) while at Kingsley & Kingsley, APC.

¹ See *Williams v. Superior Court*, 3 Cal.5th 531, 546-547 (2017) (“Marshalls notes, correctly, that PAGA actions and certified class actions have a host of identifiable procedural differences. PAGA does not make other potentially aggrieved employees parties or clients of plaintiff’s counsel, does not impose on a plaintiff or counsel any express fiduciary obligations, and does not subject a plaintiff or counsel to scrutiny with respect to the ability to represent a large class; *Baumann v. Chase Inv. Servs. Corp.*, 747 F.3d 1117, 1123 (9th Cir. 2014) (“a PAGA suit is fundamentally different than a class action” because “the court does not inquire into the named plaintiff’s and class counsel’s ability to fairly and adequately represent unnamed employees.”)).

1 5. Since founding Winston Law Group, P.C. I have also been appointed Class or PAGA
2 Counsel in numerous class action and PAGA cases including:

3 a. *JeRae Porras et al. vs. Chipotle Services, LLC, Stanislaus County Superior Court (Case*
4 *No. CV-19-000937)*. This PAGA settlement was approved by the Hon. Sonny S. Sadhu on June 16,
5 2020 in the gross amount of \$4,900,000.

6 b. *Nika Miller et al. vs. Mattress Firm, Inc., Santa Clara County Superior Court (Case No.*
7 *17CV313148)*. This PAGA settlement was approved by the Hon. Thomas E. Kunle on December 17,
8 2018 in the gross amount of \$3,750,000.

9 c. *Zirpolo vs. UAG Stevens Creek, Inc. (Penske), Santa Clara County Superior Court*
10 *(Case No. 17CV313457)*. The matter was finally approved for settlement by the Honorable Brian C.
11 Walsh in July 10, 2018 in the gross amount of \$3,275,000.

12 d. *Westbrook vs. Winco Holdings Inc. et al., Riverside County Superior Court (Case No.*
13 *RIC1710168)*. The matter was finally approved for settlement by the Hon. Raquel A. Marquez on
14 January 15, 2019 in the gross amount of \$3,000,000.

15 e. *Amster et al. vs. Starbucks Corporation, San Bernardino County Superior Court (Case*
16 *No. CIVDS1922016)*. This PAGA settlement was approved by the Hon. Donald Alvarez on July 14,
17 2020 in the gross amount of \$3,000,000.

18 f. *Antonov et al. vs. GL HHR, LLC (Ken Garff Automotive) et al., San Bernardino County*
19 *Superior Court (Case No. CIVDS1724725)*. The matter was finally approved for settlement by the Hon.
20 David Cohn on December 11, 2018 in the gross amount of \$2,850,000.

21 g. *Scoggins et al. vs. Crossmark, Inc. et al., Ventura County Superior Court (Case No. 56-*
22 *2017-00492936-CU-OE-VTA)*. The matter was finally approved for settlement by the Hon. Matthew P
23 Guasco on January 23, 2020 in the gross amount of \$2,100,000.

24 h. *Castaing et al. vs. Hendrick Automotive Group et al., Alameda County Superior Court*
25 *(Case No. RG17879115)*. The matter was finally approved for settlement by the Hon. Brad Seligman on
26 June 24, 2019 in the gross amount of \$1,850,000.

1 i. *Westphal vs. New York Life Insurance Company, Placer County Superior Court (Case*
2 *No. S-CV-0040532)*. The matter was finally approved for settlement by the Hon. Michael Jones on
3 September 11, 2018 in the gross amount of \$1,701,366.

4 j. *Adonia Williams vs. Kaiser Foundation Health Plan, Inc., Alameda County Superior*
5 *Court (Case No. RG 18917898)*. The matter was finally approved for settlement by the Hon. Stephen
6 Klaus on August 19, 2020 in the gross amount of \$1,250,000.

7 k. *Berbano and Centeno vs. Ingram Micro, Inc., San Bernardino County Superior Court*
8 *(Case No. CIVDS1826805)*. The matter was finally approved for settlement by the Hon. David Cohn on
9 September 17, 2019 in the gross amount of \$1,180,000.

10 l. *Chiefer and Goldenberg vs. WHGM, Inc. (Keyes Motors), Los Angeles County Superior*
11 *Court (Case No. LC106505)*. The matter was finally approved for settlement by the Hon. Rupert A.
12 Byrdsong on September 21, 2018 in the gross amount of \$1,150,000.

13 m. *Hollis vs. Union Pacific Railroad Co., Central District of California No. 5:17-Cv-*
14 *02449-JGB (SHKx)*). The matter was finally approved for settlement by the Hon. Jesus G. Bernal on
15 September 19, 2018 in the gross amount of \$1,083,965.

16 n. *Myers vs. Mor Furniture for Less, Inc., San Diego County Superior Court (Case No. 37-*
17 *2018-00055055-CU-OE-NC)*. The PAGA Settlement was approved by the Hon. Ronald Frazier on
18 November 27, 2018 in the amount of \$1,062,000.

19 o. *Michael Grotte vs. Normal Life of California, Inc. et al., San Luis Obispo County*
20 *Superior Court (Case No. 18CV-0672)*. The matter was finally approved for settlement by the Hon.
21 Tana L. Coates in the gross amount of \$1,050,000 on June 24, 2020.

22 p. *Wilson et al. vs. DGDG 1, LLC et al. (Del Grande Automotive Group), Santa Clara*
23 *County Superior Court (Case No. 2018-1-CV-331434)*. The matter was finally approved by the Hon.
24 Thomas E. Kuhnle on January 17, 2020 in the gross amount of \$1,024,963.71.

25 q. *Perea vs. Drybar Holdings LLC, Los Angeles County Superior Court (Case*
26 *No.BC703413)*. The matter was finally approved for settlement by the Hon. Yolanda Orosco in the
27 amount of \$1,000,000 on September 9, 2019.
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1 r. *Ghandi Ali vs. Auto Nation, Inc. et al., San Diego County Superior Court (Case No. 37-*
2 *2018-00037616-CU-OE-CTL)*. The PAGA settlement was approved by the Hon. Ronald Frazier on
3 November 14, 2019 in the amount of \$851,000.

4 s. *Martin Ashe vs. Farmers Insurance Exchange et al., Los Angeles County Superior Court*
5 *(Case No. 18STCV00453)*. This Fair Credit Reporting Act class action was approved by the Hon.
6 Steven J. Kleifield on August 6, 2020 in the gross amount of \$800,000.

7 t. *Pia vs. 5G's Automotive, Inc., Tulare County Superior Court (Case No. VCU274628)*.
8 The matter was finally approved for settlement by the Hon. Brett Hillman on September 6, 2019 in the
9 amount of \$750,000.

10 u. *Kennedy vs. 99 Cents Only Stores, LLC, Los Angeles County Superior Court (Case No.*
11 *19STCV09311)*. The PAGA settlement was approved by the Hon. Anthony Mohr on November 19,
12 2019 in the amount of \$700,000.

13 v. *Sumlin vs. BNSF Railway Company, San Bernardino County Superior Court (Case No.*
14 *CIVDS1724126)*. The matter was finally approved for settlement by the Hon. David Cohn on
15 September 5, 2018 in the amount of \$675,000.

16 w. *Brown vs. Saks and Company, LLC, Central District of California (CV 17-04210 SJO*
17 *(JEM))*. This matter was finally approved for settlement by the Hon. S. James Otero in the amount of
18 \$638,800 on March 22, 2018.

19 x. *Myers vs. LBC Limited Partnership, San Bernardino County Superior Court (Case No.*
20 *CIVDS 1715068)*. The matter was finally approved for settlement by the Hon. Janet Frangie on July 25,
21 2018 in the gross amount of \$600,000.

22 y. *Garcia vs. Optima Tax, Orange County Superior Court (Case No. 30-2019-01082473-*
23 *CU-OE-CXC)*. This PAGA settlement was approved on July 31, 2020 by the Hon. William Claster in
24 the gross amount of \$550,000.

25 z. *Delayshton Thomas et al. vs. Commercial Protective Services, Inc. et al., San Bernardino*
26 *County Superior Court (Case No. CIVDS1821925)*. The matter was finally approved for settlement by
27 Hon. David Cohn on September 16, 2019.

6. I am experienced and qualified to evaluate the PAGA claims and viability of the defenses. I have extensive experience in prosecuting and defending employment litigation, and have focused my practice primarily on cases regarding wage and hour class actions and representative PAGA actions.

7. I also have experience with contested class certifications having successfully overseen the class certification in *Amaro v. Gerawan Farming, Inc.*, No. 1:14-CV-00147-DAD-SAB (E.D. Cal. May 19, 2016) resulting in the certification of three classes of more than 6,000 employees. I personally drafted the motion for class certification, the reply in support of class certification, and the opposition to the defendant's motion for reconsideration as well as the supporting documents.

8. Based upon my experience and after factoring in the risks associated with the claims, I believe that this Settlement is fair and reasonable and should be approved.

ATTORNEYS' FEES AND COSTS

9. I am familiar with the contingent fee market throughout California, particularly as it pertains to complex employment, wage and hour, class action, and PAGA litigation. During this litigation, my Co-Counsel and I litigated this case without receiving any payment for their services or reimbursement of their costs incurred for the benefit of the state of California and the aggrieved employees.

10. On behalf of my firm, I have negotiated numerous contingency fee agreements with plaintiffs, both as individuals and as representatives in class action and PAGA suits. Many of those agreements provided that counsel will receive a fee that is between 33.33% and 40% of any recovery that is obtained, and, in addition, that counsel be reimbursed for the costs they incurred out of the recovery amount.

11. Winston Law Group, P.C. has never been paid any money for attorneys' fees in this case and has advanced costs.

12. There are always risks attendant to billing cases on a contingency basis. It is not a foregone conclusion that every case taken on a contingency fee basis will result in a recovery or that the attorneys' fees recovered will actually compensate my firm for the amount of time expended in an action. Moreover, even when successful, a class action contingency law firm may only receive a small

percentage of the amount of attorneys' fees incurred during the prosecution of a case. Where plaintiffs' counsel does succeed, therefore, it is appropriate to compensate the firm for the risks the firm regularly undertakes. There is also always the possibility that the Plaintiff will not prevail and Class Counsel will not receive any compensation for its services and/or that the Defendant will declare bankruptcy or lack the assets necessary to satisfy any judgment obtained against it. This has happened in a case handled by Winston Law Group, P.C. For instance, in *Chamberlain vs. United Airlines, Inc.*, Case No.: 3-18-cv-05246-RS, my firm spent more than 62.90 hours on the case and did not receive any compensation for the \$28,934.00 in attorney time expended on the case.

13. When awarding attorneys' fees, courts have discretion to choose among two different methods for calculating a reasonable attorney's fees award: 1) the common fund approach; or 2) the lodestar approach *See Laffitte v. Robert Half Int'l Inc.*, 1 Cal.5th 480, 504 (2016) ("The choice of a fee calculation method is generally one within the discretion of the trial court, the goal under either the percentage or lodestar approach being the award of a reasonable fee to compensate counsel for their efforts.") In *Laffitte*, the California Supreme Court held that "[t]he recognized advantages of the percentage method – including relative ease of calculation, alignment of incentives between counsel and the class, a better approximation of market conditions in a contingency case, and the encouragement it provides counsel **to seek an early settlement and avoid unnecessarily prolonging litigation** – convince us the percentage method is a valuable tool that should not be denied by our trial courts." *Id.* (emphasis added). Similarly, the Ninth Circuit has found that counsel should not "receive a lesser fee for settling a case quickly." *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043 (9th Cir. 2002). Such an award is especially appropriate, whereas here, PAGA Counsel efficiently prosecuted the action and reached a settlement without unnecessarily exhausting Defendant's resources.

14. California Courts have consistently recognized "that most fee awards based on either a lodestar or percentage calculation are 33%." *McCrary v. Elations Co., LLC*, No. EDCV 13-0242 JGB (SPx), 2016 U.S. Dist. LEXIS 24050, at *2 (C.D. Cal. Feb. 25, 2016); *McClellan v. Chase Home Fin. LLC*, No. SACV 12-1331-JGB (JEMx) 2015 U.S. Dist. LEXIS 118005, at *20 (C.D. Cal. Aug. 31, 2015) (explaining that while the attorneys' fee award that approximated 32% of all sums paid under the Settlement Agreement was reasonable after citing numerous other cases finding that an award of

33% of the common fund was common in class actions.). In reaching its decision in *McClellan*, this court recognized that “California district courts routinely award attorneys' fees in the range of 30-40% in class actions that result in the recovery of a common fund under \$10 million.” *McClellan, LLC*, No. SACV 12-1331-JGB (JEMx) 2015 U.S. Dist. LEXIS 118005, at *20 (quoting *Miller v. CEVA Logistics USA, Inc.*, No. 2:13-CV-01321-TLN, 2015 U.S. Dist. LEXIS 104704, 2015 WL 4730176, at *8 (E.D. Cal. Aug. 10, 2015) and citing *In re Mego Fin. Corp. Sec. Litig.*, 213 F.3d 454, 463 (9th Cir. 2000); *Romero v. Producers Dairy Foods, Inc.*, No. 05-0484, 2007 U.S. Dist. LEXIS 86270, 2007 WL 3492841, at *4 (E.D. Cal. Nov. 14, 2007) (awarding 33% of the settlement fund in a wage-and-hour case involving allegations of unpaid wages after explaining that “fee awards in class actions average around one-third of the recovery.”); *Stuart v. RadioShack Corp.*, No. C-07-4499 EMC, 2010 WL 3155645 (N.D. Cal. Aug. 9, 2010) (noting that a fee award of 1/3 of the settlement was “well within the range of percentages which courts have upheld as reasonable in other class action lawsuits.”); *Singer v. Becton Dickinson and Co.*, No. 08-cv-821-IEG (BLM), 2010 WL 2196104, at * 8 (S.D. Cal. June 1, 2010) (approving fee award of 33.33% of the common fund); *Boyd v. Bank of Am. Corp.*, No. SACV 13-0561-DOC (JPRx), 2014 U.S. Dist. LEXIS 162880 (C.D. Cal. Nov. 18, 2014) (awarding a 33.34% fee on a \$5,800,000 settlement).

15. PAGA Counsel’s diligent and efficient litigation of this action resulted in the creation of an ascertainable common fund of \$666,666.67 that will substantially benefit the state of California and the aggrieved employees. PAGA Counsel’s request of 1/3 of the common fund or \$100,000.00 in attorneys’ fees is consistent with fee awards in other similar cases. The attorneys’ fees in this action are being divided equally amongst the three (3) law firms. This division of fees above by no means increased the amount of legal fees that the Clients or PAGA aggrieved employees will pay or have agreed to pay attorneys for services rendered on their behalf and was agreed to by the representatives. Regardless of the number of firms involved in the case, my firm would have still sought 1/3 of the settlement as attorneys’ fees under the percentage method.

16. In *Laffitte v. Robert Half Int'l Inc.*, 1 Cal.5th 480, 506 (2016), must a trial court even conduct a lodestar cross-check. *Id.* at 506 (“We hold further that trial courts...retain the discretion **to forgo a lodestar cross-check.**”) (emphasis added). Therefore, in my opinion consistent with *Laffitte*, a

1 cross-check is not necessary nor would a lodestar award reflect the market conditions for the
2 negotiation of contingency fee agreements as such arrangements are by-and-large done on a
3 percentage basis. Nevertheless, to allow the Court to conduct a lodestar cross-check if it desires, I
4 wish to provide information concerning my hourly rate and time expended on the case.

5 17. My hourly rate is \$485.00 per hour. This reflects both my experience with Class and
6 PAGA litigation including participating in the litigation of numerous PAGA matters at the appellate
7 levels, only some of which are referenced in this declaration. It also reflects the fact that I am a partner
8 at Winston Law Group, P.C. and not an associate. This rate has been used by several courts in 2020 in
9 lodestar cross-checks.

10 18. An article in the Daily Journal, attached hereto as **Exhibit 1** discussed average billing
11 rates for firm partners and associates in the Los Angeles area. The article reveals that in 2012, the
12 average Los Angeles partner is billed out at \$797/hour while associates are billed out at \$550/hour.
13 My hourly rate of \$485.00 is below that of the average partner and even below that of the average
14 associate despite my significant experience.

15 19. The California Court of Appeal in published opinions in *Horsford v. Board of Trustees*
16 *of California State University*, 132 Cal. App. 4th 359, 397-400 (2005) and *Caldera v. Department of*
17 *Corrections & Rehabilitation*, 48 Cal.App.5th 601, 610 (2020) that it “was an abuse of discretion
18 because the court failed to consider the out-of-town market rates of the attorneys involved in this
19 case.” In *Caldera*, the California Court of Appeal’s addressed the San Bernardino County Superior
20 Court’s error in arbitrarily ignoring out-of-town rates where evidence existed that local attorneys
21 could not be found and/or do not handle this type of litigation. The evidence before the Court indicates
22 that both Plaintiffs and Defendants are represented by attorneys outside of San Bernardino—primarily
23 in Los Angeles—such that the proper market rate are those within the entirety of the Central District
24 of California as opposed to just San Bernardino rates. Therefore, in my opinion if a lodestar cross
25 check is performed, the rates should reflect the prevailing rates within the Central District of
26 California and not just the local rates in San Bernardino.

27 20. Under the lodestar approach, a base amount is calculated by “multiplying the
28 reasonable hours expended by a reasonable hourly rate.” *In re Washington Pub. Power Supply Sys.*

1 *Secs. Litig.* (9th Cir.1994) 19 F.3d 1291, fn. 2; *Wershba*, 91 Cal.App.4th at p. 254; *Serrano III*, 20
2 Cal.3d at p. 48. The reasonable hourly rate is that prevailing in the community for similar work.
3 *Margolin v. Regional Planning Com.* (1982) 134 Cal.App.3d 999, 1004–1005. Typically, the lodestar
4 is merely the starting point of the calculation of a reasonable fee, and courts often multiply the
5 lodestar by a factor to account for the risk of non-payment, delay in payment, the quality of work, and
6 the novelty and difficulty of the issues involved. *See, e.g., Ketchum v. Moses*, 24 Cal.4th at p. 1132;
7 *see also Serrano III*, 20 Cal.3d at 49; *Radar v. Thrasher* (1962) 57 Cal.2d 244, 253; *Beasley v. Wells*
8 *Fargo Bank* (1991) 235 Cal.App.3d 1407, 1419; *Coalition for L.A. County Planning v. Bd. of*
9 *Supervisors* (1977) 76 Cal.App.3d 241, 251. Multipliers can range from two to four, or even higher.
10 *Wershba v. Apple Computer, Inc.*, 91 Cal.App.4th 224, 255 (2001).

11 21. The Ninth Circuit has held that district courts “*must* apply a risk multiplier to the
12 lodestar ‘when (1) attorneys take a case with the expectation they will receive a risk enhancement if
13 they prevail, (2) their hourly rate does not reflect that risk, and (3) there is evidence that the case was
14 risky. Failure to apply a risk multiplier in cases that meet these criteria is an abuse of discretion.”
15 *Stetson v. Grissom*, 821 F.3d 1157, 1166 (9th Cir. 2016) (*quoting Stanger v. China Elec. Motor, Inc.*,
16 812 F.3d 734, 741 (9th Cir. 2016).

17 22. I have spent a considerable amount of time extensively investigating, researching, and
18 litigating this matter, including but not limited to the following:

- 19 a. researching and analyzing relevant claims and entity issues;
- 20 b. investigation of job functions, duties, compensation, policies and procedures, etc.;
- 21 c. drafting the PAGA Notices for Latoia Smith and Raymond Jones;
- 22 d. drafting the Complaint;
- 23 e. drafting a standalone Complaint for Raymond Jones in the event that Defendant did not
24 agree to stipulate to allow Plaintiff to file a First Amended Complaint;
- 25 f. drafting the First Amended Complaint;
- 26 g. drafting the Case Management Conference Statement;
- 27 h. drafting the Stipulation to Allow Plaintiffs to File a First Amended Complaint;
- 28 i. attending and participating in the negotiations with Defendants at the mediation;

- j. negotiating the terms of settlement with Opposing Counsel including the Memorandum of Understanding and revisions to the same;
- k. communicating with Opposing Counsel;
- l. communicating and strategizing with Co-Counsel; and
- m. participating in the preparation of the settlement documents including needed revisions to the Settlement related documents;
- n. conferring and assisting Ackermann & Tilajef, P.C. in the preparation of the approval papers;
- o. drafting the Notice of Settlement and Stipulation to Lift the Stay for the Purpose of seeking approval;
- p. drafting my declaration in support of approval of the Settlement;

23. Although an award of attorneys' fees as a percentage of the common fund is both common and universally accepted in wage and hour representative action litigation, I also performed a lodestar analysis for my firm in support of the attorneys' fees request. In support of the lodestar cross-check, I have prepared and attached true and correct copies of the redacted billing records for my firm in this matter as **Exhibit 2**. My firm's lodestar analysis is also summarized below for the Court's convenience.

<u>ATTORNEY</u>	<u>HOURS</u>	<u>HOURLY</u> <u>RATE</u>	<u>TOTALS</u>
David S. Winston	82.5	\$485.00	\$40,012.50

24. My firm incurred or expects to incur the following costs associated with this case. Attached hereto as **Exhibit 3** are true and correct copies of redacted receipts for expenses listed below:

<u>COST</u>	<u>AMOUNT</u>
PAGA Filing Fee for Latoia Smith	\$75.00
Postage Associated with Service of the PAGA Notice by	\$4.95

1	Certified Mail	
2	Postage Associated with mailing of the Smith PAGA	
3	Filing Fee and Cover Letter to the LWDA (Stamp no	\$0.55
4	receipt)	
5	First Legal Charge for Filing of Complaint includes \$435	
6	Court Filing Fee and \$1,000 Complex Fee	\$1,715.44
7	First Legal Charge for Service of the Complaint and	
8	Other Documents	\$110.24
9	San Bernardino County Superior Court Document	
10	Charge for Complaint from <i>Spivey</i>	\$14.00
11	San Bernardino County Superior Court Document	
12	Charge for Status Report from <i>Spivey</i>	\$4.00
13	PAGA Filing Fee for Raymond Jones	\$75.00
14	Postage Associated with Service of the Raymond Jones	
15	PAGA Notice by Certified Mail	\$4.95
16	Postage Associated with mailing of the Jones PAGA	
17	Filing Fee and Cover Letter to the LWDA (Stamp no	\$0.55
18	receipt)	
19	Fax Filing Charge for Proof of Service of Summons—	
20	Note that No Receipt was provided by the Court though	\$2.00
21	it was requested per the attached Fax Filing Coversheet	
22	Postage Associated with Service of Joint Stipulation to	
23	Allow Plaintiff to File a First Amended Complaint	\$8.25
24	First Legal Charge for Filing of Joint Stipulation to	
25	Allow Plaintiff to File an FAC	\$259.74
26	Mediation Fees	\$2,333.33
27	Postage associated with mailing mediation fees to the	\$0.55
28		

mediator (Stamp no receipt)	
First Legal Charge for Filing First Amended Complaint and 2 Doe Amendments	\$155.14
Copies	\$93.10 (121 pages x \$0.35 per page)
TOTAL COSTS	\$4,856.79

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

Executed this 14th day of September 2020, in Los Angeles, California.


DAVID S. WINSTON

Exhibit 1

LOS ANGELES

Daily Journal

www.dailyjournal.com

VOL. 125 NO. 135

FRIDAY, AUGUST 10, 2012

Associate billing rates start climbing again

Average rates going back up after stagnation brought on by recession

By Kevin Loo
Daily Journal Staff Writer

Average law firm billing rates are back on the rise after stagnating somewhat in the years following the 2008 financial crisis. But most of the action is taking place in associate billing rates, which jumped 7.5 percent in the first half of the year compared to the same period in 2011, more than twice the average rate increase in partner billing rates nationwide.

Industry experts say the discrepancy appears to be the market correcting itself after firms slashed off associates and froze associate hiring in 2009 and 2010.

Partner billing rates, by comparison, rose 3.4 percent in the first half of the year compared to the year-earlier period, according to the latest research by Vero Partners LLC, a Washington D.C.-based consulting firm.

Vero compiled data on the billing rates of lawyers at 650 U.S. law firms through publicly available documents, such as court filings, fee applications and disclosure statements submitted to federal agencies.

Chuck Chandler, a Vero co-founder and partner, said this year's rate increases were instituted to offset the lack of rate movement during the recession.

"The associates took the hit after 2008. Some firms laid off as much as 10 percent of their associates, delayed hiring new classes and froze compensation," he said. "Naturally, billing rates were slow to increase during that period."

For the first six months of this year, California markets all saw associate rate increases below the national average. Associates in San Francisco and Silicon Valley together claimed the highest average rate increase of the California markets — 7.5 percent.

"Northern California has all of the social media, the technology companies, which creates a lot of dealmaking and IPOs and also good fees and hourly rates," Chandler said.

By comparison, Los Angeles associates saw their rates go up an average of 6.0 percent. In San Diego, associate rates rose 4.2 percent.

Law firms generally increase billing rates each year, according to Sheppard, Mullin, Richter & Hampton LLP partner Marc A. Sockol, who manages the firm's Palo Alto office.

"If inflation goes up 3 percent, so do our associate billing rates, because that is what covers rent, lights, computers, telephones, desks," Sockol said. "During those first couple years of this recession, we chose not to

Average Law Firm Billing Rates

Location	Position	2012	2011	Percent Increase
Los Angeles	Partner	\$577	\$560	3.0%
	Associate	\$510	\$476	6.8%
San Diego	Partner	\$568	\$568	0%
	Associate	\$394	\$378	4.2%
San Francisco	Partner	\$675	\$654	3.2%
	Associate	\$483	\$449	7.5%
National	Partner	\$750	\$725	3.4%
	Associate	\$495	\$460	7.5%

Source: Vero 2012 Halftime Report

Associate billing rates going up

Continued from page 1

boost our billing rates."

Sockol declined to provide specific billing rates but said the firm varies its associate rates by practice group and geography. For 2012, the firm raised associate billing rates roughly 3 percent, he said.

James G. Leibold, executive director of the National Association for Law Placement in Washington D.C., said the jump in billing rates results from the overall decrease of associates at law firms, especially at large law firms. Large law firms, which are the biggest employers of junior lawyers, are relying less on partnership-track associates and more on staff lawyers, paralegals and contract lawyers.

NALP data reveals that from 2008 to 2011, large law firms on average hired entry-level associates at an

annual starting salary of \$160,000. Some law firms cut their starting salaries to \$145,000 during that time but not many, Leibold said he thought more firms would follow suit.

"If inflation goes up 3 percent, so do our associate billing rates, because that is what covers rent, lights, computers, telephones, desks."

— Marc A. Sockol

"What we saw was that law firms reduced their associate class sizes dramatically, but they didn't reduce their pay," Leibold said. "They just

provided many fewer jobs."

Some large firms have turned to creating nonpartnership-track staff lawyer positions for new classes of junior lawyers, whose billing rates and compensation are lower than those of partnership-track associates.

Law firms can then maintain or increase the billing rates for the small number of associates on the partnership track, knowing they can turn to their staff lawyers, paralegals or contract lawyers to drive down the cost of legal services for clients.

"I think you'll see that [approach] more in the next couple of years," Leibold said. "It's another way for them to bring the salary structure back down and meet the cost-containment demands of clients and use people more efficiently."

kevin_loo@dailyjournal.com

Exhibit 2

WINSTON LAW GROUP, P.C.
OPERATING ACCOUNT
1180 S. BEVERLY DRIVE, SUITE 610
LOS ANGELES, CA 90035

1129

DATE 7/24/19

PAY TO THE
ORDER OF

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seventy-five dollars and 00/100

DOLLARS

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FOR Latoia Smith vs. Burlington merch. PPA# Fee

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(BURLINGTON, NJ 08016)
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(Thursday 08/01/2019)

Certified \$3.50

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(70190700000156273716)

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Invoice No.	Customer No.
10264044	11043
Invoice Date	Total Due
10/15/19	2,085.48

Winston Law Group, P.C.
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1180 S. Beverly Dr. Suite 320
Los Angeles, CA 90035

BILLING/PAYMENT QUESTIONS
CLIENT CARE (877)350-8698

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			11043	10264044	10/15/19	2,085.48	1		
Date	Ord# No.	Svc	Service Detail					Charges	Total
10/03/19	4144430	BFX	WINSTON LAW GROUP, P.C.		SBSC-SAN BERNARDINO SUPERIOR COURT	Base Chg :		83.25	1,715.44
FILING-BRNCH PDF SAME		DAY	1180 S. BEVERLY DRIVE		247 W 3RD ST	PDF/Ship :		46.20	
			LOS ANGELES CA 90035		SAN BERNARDINO CA 92401	Fuel Chg :		7.49	
			Caller: David Winston			Adv/wit Ck:		1435.00	
			LATOIA SMITH V BURLINGTON MERCHANDISING		ADVANCE FEES	Check Chg :		143.50	
			SUMMONS & COMPLAINT		INFILE AND SERVE				
			Signed: filed		PLEASE FWD COPIES TO				
					PROCESS				
					Ref: SMITH V BURLINGTON				
10/07/19	4147244	3DP	WINSTON LAW GROUP, P.C.		Burlington Merchandising Corp.	Base Chg :		58.75	110.24
PROCESS-3 DAYS			1180 S. BEVERLY DRIVE		818 W 7th St	PDF/Ship :		46.20	
			LOS ANGELES CA 90035		LOS ANGELES CA 90017	Fuel Chg :		5.29	
			Caller: David Winston						
			CIVDS1929684						
			LATOIA SMITH V BURLINGTON MERCHANDISING						
SUMMONS & COMPLAINT									
			Signed: Albert Damonte, Intake		Ref: SMITH V BURLINGTON				

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david@employmentlitigators.com

From: docsales@sb-court.org
Sent: Monday, July 22, 2019 8:25 PM
To: david@employmentlitigators.com
Subject: Receipt of Order

Thank you for your order. Your payment has been received.
Details of your order are as follows:

Order ID: # 292157
Order Date: 07/22/2019
Name: David Winston

Document(s):
Case CIVDS1911341 COMPLAINT AND PARTY (28pgs)

Total Paid: \$14.00
Method of Payment: Visa*****

View your account transactions 24/7 at <http://Ecomm1.sb-court.org>.
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david@employmentlitigators.com

From: docsales@sb-court.org
Sent: Friday, July 26, 2019 6:37 PM
To: david@employmentlitigators.com
Subject: Receipt of Order

Thank you for your order. Your payment has been received.
Details of your order are as follows:

Order ID: # 293216
Order Date: 07/26/2019
Name: David Winston

Document(s):
Case CIVDS1833764 JOINT STATMENT REGAR (8pgs)

Total Paid: \$4.00
Method of Payment: Visa**** 

View your account transactions 24/7 at <http://Ecomm1.sb-court.org>.

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OPERATING ACCOUNT
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LOS ANGELES, CA 90035

1163

DATE 11/6/19

PAY TO THE
ORDER OF

LWDA

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seventy-five dollars and 00/100

DOLLARS

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12

FOR

Raymond Jones vs. Burlington P&A mic

David Wilson
AUTHORIZED SIGNATURE

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(800)275-8777
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Product	Qty	Unit Price	Price
First-Class Mail® Letter (Domestic) (SUN VALLEY, CA 91352) (Weight: 0 Lb 0.60 Oz) (Estimated Delivery Date) (Friday 11/08/2019)	1	\$0.55	\$0.55
Certified			\$3.50
[REDACTED]			
First-Class Mail® Large Envelope (Domestic) (BURLINGTON, NJ 08016) (Weight: 0 Lb 3.60 Oz) (Estimated Delivery Date) (Saturday 11/09/2019)	1	\$1.45	\$1.45
Certified (USPS Certified Mail #) (70190700000156274218)			\$3.50
Total:			\$9.00

Cash	\$20.00
Change	(\$11.00)

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Large Envelope
(Domestic)
(BURLINGTON, NJ 08016)
(Weight:0 Lb 3.60 Oz)
(Estimated Delivery Date)
(Saturday 11/09/2019)
Certified \$3.50
(USPS Certified Mail #)
(70190700000156274218)

Total: \$9.00

Cash \$20.00
Change (\$11.00)

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Clerk: 07

FOR COURT USE ONLY

ATTORNEY FOR (Name): Latoia Smith

BRANCH NAME : San Bernardino Justice Center

DEFENDANT/RESPONDENT: Burlington Merchandising Corporation

FACSIMILE TRANSMISSION COVER SHEET

CASE NUMBER:

CIVDS1929684

TO THE COURT:

- 1. Please file** the following transmitted documents in the order listed below:

Document name

No. of pages

Proof of Service of Summons

2

PLEASE FAX RECEIPT

2. ☐ **Processing instructions** consisting of: _____ pages are also transmitted.

3. ☒ **Fee required** ☐ Filing fee ☒ Fax fee (Cal. Rules of Court, rule 10.815)

- a. ☒ **Credit card payment** I authorize the above fees and any amount imposed by the card issuer or draft purchaser to be charged to the following account: _____

☒ VISA ☐ MASTERCARD☒ VISA ☐ MASTERCARD

Account No.:

Expiration date:

David S. Winston

(TYPE OR PRINT NAME OF CARDHOLDER)

(SIGNATURE OF CARDHOLDER)

- b. ☐ **Attorney account** (Cal. Rules of Court, rule 2.304). Please charge my account no.:

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Product	Qty	Unit Price	Price
PM 1-Day (Domestic) (LOS ANGELES, CA 90017) (Weight: 1 Lb 3.90 Oz) (Expected Delivery Day) (Thursday 01/30/2020) (USPS Tracking #) (9505 5145 1536 0029 3136 52)	1	\$8.25	\$8.25
Insurance (Up to \$50.00 included)			\$0.00
Total:			\$8.25

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Cash	\$10.25
Change	(\$2.00)

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Clerk: 01



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TAX ID# 27-3093840

INVOICE

Invoice No.	Customer No.
10291691	11043
Invoice Date	Total Due
1/31/20	1,878.58

Winston Law Group, P.C.
ATTN: DAVID WINSTON
1180 S. Beverly Dr. Suite 320
Los Angeles, CA 90035

BILLING/PAYMENT QUESTIONS
CLIENT CARE (877)350-8698

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			11043	10291691	1/31/20	1,878.58	1		
Date	Ord No.	Svc	Service Detail					Charges	Total



First Legal Network, LLC
P.O. Box 743451
Los Angeles CA 90074-3451

TAX ID# 27-3093840

INVOICE

Invoice No.	Customer No.
10291691	11043
Invoice Date	Total Due
1/31/20	1,878.58

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CLIENT CARE (877)350-8698

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			11043	10291691	1/31/20	1,878.58	2		
Date	Ord No.	Svc	Service Detail					Charges	Total
1/29/20	4270353	BFX	Winston Law Group, P.C.		SBSC-SAN BERNARDINO		Base Chg :		83.25
			1180 S. Beverly Drive		247 WEST 3RD STREET		PDF/Ship :		147.00
FILING-BRNCH	PDF SAME	DAY	LOS ANGELES CA 90035		SAN BERNARDINO CA 92415		Fuel Chg :		7.49
			Caller: David Winston		ADVANCE FEE		Adv/Wit Ck:		20.00
			CIVDS1929684				Check Chg :		2.00
			Smith vs. Burlington Merchandising						259.74
			Joint Stipulation to Allow Plaintiff						
			Signed: rcvd		Ref: SMITH VS. BURLINGTON ME				

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Invoice No.	Customer No.
10291691	11043
Invoice Date	Total Due
1/31/20	1,878.58

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Los Angeles, CA 90035

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CLIENT CARE (877) 350-8698

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			11043	10291691	1/31/20	1,878.58	3		
Date	Ordr No.	Svc	Service Detail					Charges	Total
1/30/20	4271754	3DP							
PROCESS-3 DAYS									
			Invoice Amount: 1,423.58						
			Fees Advanced: 455.00						
			Total Amount Due: 1,878.58						
			</						

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1180 S. BEVERLY DRIVE, SUITE 610
LOS ANGELES, CA 90035

1201

DATE 2/4/20

PAY TO THE
ORDER OF

Jeffrey Ross

\$ 2333.33

two-thousand three-hundred thirty-three dollars and 33/100 — DOLLARS



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FOR

Smith vs. Burlington Mediation

David Arizumi

AUTHORIZED SIGNATURE



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Invoice No.	Customer No.
10328514	11043
Invoice Date	Total Due
7/31/20	587.57

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Los Angeles, CA 90035

BILLING/PAYMENT QUESTIONS
CLIENT CARE (877)350-8698

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			11043	10328514	7/31/20	587.57	1		
Date	Ord# No.	Svc	Service Detail					Charges	Total
7/17/20	4405702	BFX	Winston Law Group, P.C.		SBSC-SAN BERNARDINO SUPERIOR COURT		Base Chg	:	83.25
FILING-BRNCH PDF SAME DAY			1180 S. Beverly Dr.		247 W 3RD ST		PDF/Ship	:	64.40
			LOS ANGELES CA 90035		SAN BERNARDINO CA 92401		Fuel Chg	:	7.49
			Caller: Brigitte Bahari						
			civds1929684		FILE/CONFORM/RETURN				
			SMITH V BURLINGTON		ADVANCE FEES				
			1ST AMND COMPL,AMDMNT COMPL X2		COMPLEX FEE FOR				
					RAYMOND JONES				
			Signed: drop box		Ref: LATOIA SMITH				

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ATTN: DAVID WINSTON
1180 S. Beverly Dr. Suite 320
Los Angeles, CA 90035

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Invoice No.	Customer No.
10328514	11043
Invoice Date	Total Due
7/31/20	587.57

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Exhibit 3

Un-Invoiced Time List

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Date	Client Name	Project	Description	Hours
7/26/2019	Burlington Merchandising		Draft 16 Page PAGA Notice	5.30
7/26/2019	Burlington Merchandising		Send email to Client re: [REDACTED]	0.10
7/26/2019	Burlington Merchandising		Send additional email to Client re: [REDACTED]	0.10
7/26/2019	Burlington Merchandising		Research/Analyze other cases	0.40
7/26/2019	Burlington Merchandising		Review/Analyze email from Client re: [REDACTED]	0.10
7/28/2019	Burlington Merchandising		Review/Analyze email from Client re: [REDACTED]	0.10
7/28/2019	Burlington Merchandising		Review/Analyze additional email from Client re: [REDACTED]	0.10
7/28/2019	Burlington Merchandising		Respond to email from Client re: [REDACTED]	0.10
7/29/2019	Burlington Merchandising		Finalize and File PAGA Notice	0.30
7/31/2019	Burlington Merchandising		Review/Analyze email from Latoia Smith re: [REDACTED]	0.10
7/31/2019	Burlington Merchandising		Respond to email from Latoia Smith re: [REDACTED]	0.10
8/1/2019	Burlington Merchandising		Review email from client re: [REDACTED]	0.10
8/1/2019	Burlington Merchandising		Respond to email from Client re: [REDACTED]	0.10
8/27/2019	Burlington Merchandising		Review/Analyze records	0.40
8/27/2019	Burlington Merchandising		Send detailed email to Company re: Record and entity issues	0.30
8/29/2019	Burlington Merchandising		Review/Analyze email from Client re: [REDACTED]	0.10
10/2/2019	Burlington Merchandising		Research/Analyze other cases	0.30
10/2/2019	Burlington Merchandising		Send email to Opposing Counsel in Spivey re: Notice of Related Cases	0.10

10/2/2019	Burlington Merchandising	Correspondence with Craig Ackermann re: Spivey vs. Burlington	0.10
10/2/2019	Burlington Merchandising	Send email to Client re: [REDACTED]	0.10
10/2/2019	Burlington Merchandising	Draft Complaint	3.90
10/3/2019	Burlington Merchandising	Finalize Complaint and Ancillary Documents for filing	1.20
10/3/2019	Burlington Merchandising	Review/Analyze emails between Craig Ackermann and David Mara re: Cases	0.20
10/3/2019	Burlington Merchandising	Emails with Simon Yang (3 total) re: filing and the notice of related case	0.20
10/8/2019	Burlington Merchandising	Phone Call with Dave Mara re: Joint Prosecution	0.30
10/10/2019	Burlington Merchandising	Review/Analyze email from Process Server about service	0.10
10/10/2019	Burlington Merchandising	Send email to Brigitte about Proof of Service	0.10
10/10/2019	Burlington Merchandising	Send email to Simon Yang re: Working Together with Spivey Counsel	0.10
10/10/2019	Burlington Merchandising	Send follow-up email to Simon re: Call about big picture issues and procedural issues	0.10
10/10/2019	Burlington Merchandising	Review/Analyze email from Simon Yang re: Big picture issues	0.10
10/15/2019	Burlington Merchandising	Review/Analyze email from Simon Yang re: Phone Call	0.10
10/15/2019	Burlington Merchandising	Respond to email from Simon Yang re: Phone Call	0.10
10/16/2019	Burlington Merchandising	Review email from Dave Mara re: Phone Call	0.10
10/16/2019	Burlington Merchandising	Review/Analyze email from Simon Yang re: Phone Call	0.10
10/16/2019	Burlington Merchandising	Respond to email from Simon Yang re: Phone Call	0.10
10/16/2019	Burlington Merchandising	Review/Analyze follow-up email from Simon Yang re: Phone Call	0.10
10/16/2019	Burlington Merchandising	Respond to follow-up email from Simon Yang re: Phone Call	0.10
10/21/2019	Burlington Merchandising	Send detailed email to Co-Counsel re: Mediation Issues	0.30
10/21/2019	Burlington Merchandising	Revise/Finalize email to Opposing Counsel re: Mediation and Consolidation issues	0.20
10/24/2019	Burlington Merchandising	Phone Call with VM to Simon Yang	0.10

10/24/2019	Burlington Merchandising	Review/Analyze email from Dave Mara about aggrieved employee	0.10
10/24/2019	Burlington Merchandising	Send email to Dave Mara re: aggrieved employee	0.10
10/24/2019	Burlington Merchandising	Phone Call with aggrieved employee	0.20
10/29/2019	Burlington Merchandising	Phone call with Simon Yang re: Additional Representative	0.20
10/30/2019	Burlington Merchandising	Send email to Co-Counsel re: Additional Representative	0.10
10/30/2019	Burlington Merchandising	Respond to email to Co-Counsel re: additional representative	0.10
10/30/2019	Burlington Merchandising	Review/Analyze email from Opposing Counsel	0.10
11/4/2019	Burlington Merchandising	Send email to Opposing Counsel re: Service	0.10
11/5/2019	Burlington Merchandising	Phone Call with Client re: [REDACTED]	0.30
11/5/2019	Burlington Merchandising	Send email to Simon Yang re: PAGA Notice Service	0.10
11/12/2019	Burlington Merchandising	Phone Call with Simon Yang re: Settlement discussions and procedural posture of the cases	0.50
11/12/2019	Burlington Merchandising	Send email to Opposing Counsel re: CMC Order and OSC re: Related Cases	0.10
11/15/2019	Burlington Merchandising	Phone Call with VM to Simon Yang re: Procedural Issues	0.10
11/15/2019	Burlington Merchandising	Send email to Simon Yang re: Procedural Issues and Settlement discussions	0.10
11/15/2019	Burlington Merchandising	Review/Analyze email from Simon Yang re: phone call	0.10
11/18/2019	Burlington Merchandising	Phone call with Simon Yang re: Pleading issues	0.20
11/18/2019	Burlington Merchandising	Phone Call with Dave Mara re: Procedural Issues	0.10
11/19/2019	Burlington Merchandising	Send email to Simon Yang re: Spivey	0.10
11/19/2019	Burlington Merchandising	Review/Analyze email from Simon Yang re: Spivey	0.10
11/19/2019	Burlington Merchandising	Respond to email from Simon Yang re: Spivey	0.10
11/20/2019	Burlington Merchandising	Send email to Simon Yang re: Mediation Dates	0.10
11/20/2019	Burlington Merchandising	Respond to email from Simon Yang re: Mediation Dates	0.10

11/20/2019	Burlington Merchandising	Send email to Co-Counsel re: JPA and Mediation Issues	0.10
11/20/2019	Burlington Merchandising	Review/Analyze email from Opposing Counsel re: Mediation	0.10
11/20/2019	Burlington Merchandising	Send detailed email to Co-Counsel re: Potential Mediators	0.30
11/20/2019	Burlington Merchandising	Review/Analyze email from JB re: Mediation Dates	0.10
11/20/2019	Burlington Merchandising	Discuss Mediation Dates with JB	0.10
11/20/2019	Burlington Merchandising	Review/Analyze email from Co-Counsel re: Mediation issues	0.10
11/20/2019	Burlington Merchandising	Review/Analyze email from Opposing Counsel re: Procedural Issues	0.10
11/20/2019	Burlington Merchandising	Review/Analyze email from Simon Yang re: Mediators and timing	0.10
11/21/2019	Burlington Merchandising	Review/Analyze email from Latoia Smith re: [REDACTED]	0.10
11/21/2019	Burlington Merchandising	Send detailed email to Latoia Smith re: [REDACTED]	0.20
11/22/2019	Burlington Merchandising	3 emails with client re: [REDACTED]	0.30
12/2/2019	Burlington Merchandising	Review/Analyze email from Client re: [REDACTED]	0.10
12/2/2019	Burlington Merchandising	Respond to email from Client re: [REDACTED]	0.10
12/2/2019	Burlington Merchandising	Review/Analyze additional email from Client re: [REDACTED]	0.10
12/2/2019	Burlington Merchandising	Respond to additional email from Client re: [REDACTED]	0.10
12/3/2019	Burlington Merchandising	Review/Analyze follow-up email from Client re: [REDACTED]	0.10
12/3/2019	Burlington Merchandising	Respond to email from Client re: [REDACTED]	0.10
12/4/2019	Burlington Merchandising	Phone Call with Raymond Jones re: [REDACTED]	0.20
12/5/2019	Burlington Merchandising	Call with Client re: [REDACTED]	0.40
12/5/2019	Burlington Merchandising	Phone Call with VM to Simon Yang re: CMC issues	0.10
12/9/2019	Burlington Merchandising	Discuss hearings with JB	0.10
12/9/2019	Burlington Merchandising	Send email to Simon Yang re: Continunace of Hearings	0.10

12/9/2019	Burlington Merchandising	Review Docket and continuance from the Court	0.10
12/12/2019	Burlington Merchandising	Discuss potential settlement and other logistic related issues with Simon Yang	0.20
12/19/2019	Burlington Merchandising	Discuss JPA with Craig Ackermann	0.10
12/19/2019	Burlington Merchandising	Review email from JB re: JPA	0.10
12/19/2019	Burlington Merchandising	Review/Analyze email from Dave Mara re: JPA	0.10
12/19/2019	Burlington Merchandising	Review/Analyze follow up email from JB re: JPA	0.10
12/19/2019	Burlington Merchandising	Respond to follow-up email from JB re: JPA	0.10
12/19/2019	Burlington Merchandising	Send email to JB re: JPA	0.10
12/19/2019	Burlington Merchandising	Review/Analyze email from CJA re: JPA	0.10
12/19/2019	Burlington Merchandising	Respond to email from CJA re: JPA	0.10
12/19/2019	Burlington Merchandising	Review/Analyze another follow-up email from JB re: JPA	0.10
12/19/2019	Burlington Merchandising	Respond to another follow-up email from JB re: JPA	0.10
12/19/2019	Burlington Merchandising	Phone Call with VM to Simon Yang re: Pleadings	0.10
12/23/2019	Burlington Merchandising	Phone Call with Simon Yang re: Settlement Issues	0.20
12/23/2019	Burlington Merchandising	Send email to Simon Yang re: FAC	0.10
1/2/2020	Burlington Merchandising	Phone Call with VM to Simon Yang re: First Amended Complaint	0.10
1/2/2020	Burlington Merchandising	Review/Analyze email from Craig Ackermann re: Possible Mediation with David Rotman	0.10
1/2/2020	Burlington Merchandising	Respond to email from Craig Ackermann re: Possible Mediation with David Rotman	0.10
1/2/2020	Burlington Merchandising	Review/Analyze additional email from Craig Ackermann re: Possible Mediation with David Rotman	0.10
1/2/2020	Burlington Merchandising	Respond to additional email from Craig Ackermann re: Possible Mediation with David Rotman	0.10
1/2/2020	Burlington Merchandising	Review/Analyze third email from Craig Ackermann re: Possible Mediation with David Rotman	0.10
1/2/2020	Burlington Merchandising	Respond to third email from Craig Ackermann re: Possible Mediation with David Rotman	0.10

1/2/2020	Burlington Merchandising	Draft Conflict Waiver for JPA	0.40
1/2/2020	Burlington Merchandising	Discuss Conflict Waiver with Craig Ackermann	0.10
1/2/2020	Burlington Merchandising	Send email to Raymond Jones re: [REDACTED]	0.10
1/2/2020	Burlington Merchandising	Send email to Latioa Smith re: [REDACTED]	0.10
1/2/2020	Burlington Merchandising	Draft First Amended Complaint	1.70
1/2/2020	Burlington Merchandising	Draft Stipulation to Allow Plaintiff to file a First Amended Complaint	0.50
1/2/2020	Burlington Merchandising	Send email to Simon Yang re: FAC and Stipulation re: Same	0.10
1/3/2020	Burlington Merchandising	Review/Analyze email from Client re: [REDACTED]	0.10
1/3/2020	Burlington Merchandising	Respond to email from Latoia Smith re: [REDACTED]	0.10
1/3/2020	Burlington Merchandising	Review/Analyze email from Raymond Jones re: [REDACTED]	0.10
1/6/2020	Burlington Merchandising	Send email to Raymond Jones re: [REDACTED]	0.10
1/6/2020	Burlington Merchandising	Review/Analyze email from Raymond Jones re: [REDACTED]	0.10
1/6/2020	Burlington Merchandising	Send email to Simon Yang re: FAC and Stipulation	0.10
1/6/2020	Burlington Merchandising	Review/Analyze additional email from Raymond Jones re: [REDACTED]	0.10
1/6/2020	Burlington Merchandising	Phone Call with Raymond Jones re: [REDACTED]	0.20
1/6/2020	Burlington Merchandising	Send email to Co-Counsel re: JPA, Mediation, Caption, and Spivey stay	0.20
1/8/2020	Burlington Merchandising	Send email to Simon Yang re: FAC	0.10
1/8/2020	Burlington Merchandising	Phone Call with VM to Simon Yang re: FAC	0.10
1/9/2020	Burlington Merchandising	Send email to Simon Yang re: Jones Complaint	0.10
1/9/2020	Burlington Merchandising	Phone Call with Simon Yang re: FAC and Mediation	0.40
1/9/2020	Burlington Merchandising	Discuss Stay needed for mediation	0.10
1/10/2020	Burlington Merchandising	Revise Stip for First Amended Complaint	0.20

1/10/2020	Burlington Merchandising	Phone Call with Client re: [REDACTED]	0.40
1/10/2020	Burlington Merchandising	Email to Simon Yang re: Stip	0.10
1/14/2020	Burlington Merchandising	Review/Analyze email from JB re: CMC	0.10
1/14/2020	Burlington Merchandising	Respond to email from JB re: CMC and meet and confer	0.10
1/14/2020	Burlington Merchandising	Send email to Simon Yang re: Meet and Confer	0.10
1/15/2020	Burlington Merchandising	Send email to Simon Yang re: Meet and Confer	0.10
1/15/2020	Burlington Merchandising	Review/Analyze email from Simon Yang re: Meet and Confer for the CMC	0.10
1/15/2020	Burlington Merchandising	Send email to John re: Meet and Confer CMC	0.10
1/15/2020	Burlington Merchandising	Review/Analyze email from John Yslas re: CMC Meet and Confer	0.10
1/15/2020	Burlington Merchandising	Respond to email from John re: CMC meet and confer	0.10
1/15/2020	Burlington Merchandising	Review/Analyze follow up email from John Yslas re: CMC Meet and Confer	0.10
1/15/2020	Burlington Merchandising	Respond to follow up email from John re: CMC meet and confer	0.10
1/16/2020	Burlington Merchandising	Send follow up email to John re: CMC meet and confer	0.10
1/16/2020	Burlington Merchandising	Review/Analyze email from John re: Meet and Confer	0.10
1/16/2020	Burlington Merchandising	Respond to email from John re: Meet and Confer	0.10
1/16/2020	Burlington Merchandising	Review/Analyze email from Tony re: Stay and Caption	0.10
1/16/2020	Burlington Merchandising	Send follow-up email to Co-Counsel re: Mediators	0.10
1/16/2020	Burlington Merchandising	Discuss Mediator availability with Brigitte and dates project for Burlington CMC meet and confer	0.10
1/17/2020	Burlington Merchandising	Meet and Confer for CMC with John Yslas	0.50
1/17/2020	Burlington Merchandising	Send email to Co-Counsel re: Meet and Confer	0.10
1/17/2020	Burlington Merchandising	Review/Analyze email from Co-Counsel re: CMC meet and confer	0.10
1/17/2020	Burlington Merchandising	Respond to email from Co-Counsel re: CMC meet and confer	0.10

1/17/2020	Burlington Merchandising	Send detailed follow-up email to Co-Counsel	0.20
1/17/2020	Burlington Merchandising	Draft CMC Statement	1.10
1/18/2020	Burlington Merchandising	Continue Drafting CMC Statement	1.10
1/18/2020	Burlington Merchandising	Send email to Opposing Counsel re: CMC Statement	0.10
1/21/2020	Burlington Merchandising	Send email to Opposing Counsel re: CMC Statement	0.10
1/21/2020	Burlington Merchandising	Revise/Finalize CMC Statement	0.50
1/21/2020	Burlington Merchandising	Respond to email from Opposing Counsel re: CMC Statement	0.10
1/21/2020	Burlington Merchandising	Send detailed email to Opposing Counsel re: CMC Statement and changes	0.20
1/21/2020	Burlington Merchandising	Review/Analyze follow-up email from Opposing Counsel	0.10
1/21/2020	Burlington Merchandising	Review/Analyze additional changes to CMC Statement from Opposing Counsel	0.10
1/22/2020	Burlington Merchandising	Phone Call to Simon Yang with VM re: Stipulation	0.10
1/22/2020	Burlington Merchandising	Send email to Opposing Counsel re: Stipulation	0.10
1/23/2020	Burlington Merchandising	Draft Complaint for standalone action for Raymond Jones	2.10
1/23/2020	Burlington Merchandising	Phone Call with John Islas re: Settlement Issues and FAC	0.20
1/23/2020	Burlington Merchandising	Phone Call with Simon Yang re: Settlement Issues and FAC	0.30
1/23/2020	Burlington Merchandising	Send detailed email to Co-Counsel re: issues in the case and mediators	0.30
1/24/2020	Burlington Merchandising	Send additional follow up email to Co-Counsel re: mediation issues	0.20
1/24/2020	Burlington Merchandising	Send email to Simon Yang re: Mediation issues	0.10
1/24/2020	Burlington Merchandising	Send additional email to Simon Yang re: Settlement issues	0.10
1/27/2020	Burlington Merchandising	Review/Analyze email from Simon Yang re: Revised Stipulation to allow Plaintiff Raymond Jones to file a FAC	0.10
1/27/2020	Burlington Merchandising	Review/Analyze email from Craig Ackermann re: Stipulation to allow Plaintiff to file a FAC	0.10
1/27/2020	Burlington Merchandising	Send follow-up email to Simon Yang re: Stipulation	0.10

2/3/2020	Burlington Merchandising	Email to Client re: [REDACTED]	0.10
2/3/2020	Burlington Merchandising	Review/Analyze email from Client re: [REDACTED] [REDACTED]	0.10
2/3/2020	Burlington Merchandising	Respond to email from Client re: [REDACTED]	0.10
2/6/2020	Burlington Merchandising	Phone Call with Raymond Jones re: [REDACTED] [REDACTED]	0.20
2/10/2020	Burlington Merchandising	Review/Analyze email from Simon Yang re: Stipulation	0.10
2/10/2020	Burlington Merchandising	Review/Analyze proposed stipulation	0.20
2/10/2020	Burlington Merchandising	Review/Analyze Docket to determine proposed revisions to the stipulation	0.10
2/10/2020	Burlington Merchandising	Send email to Simon Yang re: Stipulation	0.10
2/10/2020	Burlington Merchandising	Review/Analyze follow-up email re: Stipulation	0.10
2/14/2020	Burlington Merchandising	Review/Analyze Court Docket to Determine Issue with Stipulation to Allow Plaintiff to File an FAC	0.10
2/14/2020	Burlington Merchandising	Send detailed email to Opposing Counsel re: Stipulation to File FAC	0.20
2/14/2020	Burlington Merchandising	Review/Analyze follow-up email from Simon Yang re: Stipulations	0.10
2/14/2020	Burlington Merchandising	Respond to follow-up email from Simon Yang re: Stipulation	0.10
2/14/2020	Burlington Merchandising	Send email to Co-Counsel re: Stipulation to Consolidate Cases	0.10
2/25/2020	Burlington Merchandising	Review/Analyze email from Simon Yang re: Stipulation	0.10
2/25/2020	Burlington Merchandising	Review/Analyze email from Tony Roberts re: Stipulation	0.10
2/25/2020	Burlington Merchandising	Respond to email from Simon Yang re: Stipulation	0.10
2/25/2020	Burlington Merchandising	Respond to email from Tony Roberts re: Stipulation	0.10
2/28/2020	Burlington Merchandising	Phone Call with VM to Simon Yang re: Stipulation	0.10
3/2/2020	Burlington Merchandising	Phone Call with VM to Simon Yang re: Stipulation	0.10
3/3/2020	Burlington Merchandising	Draft Status Report	0.80
3/3/2020	Burlington Merchandising	Draft detailed email to Opposing Counsel re: Status Report	0.20

3/4/2020	Burlington Merchandising	Review/Analyze email from Simon Yang re: Stipulation	0.10
3/4/2020	Burlington Merchandising	Review/Analyze proposed changes to Simon Yang re: Stipulation	0.10
3/4/2020	Burlington Merchandising	Send email to Opposing Counsel re: Stipulation	0.10
3/4/2020	Burlington Merchandising	Send follow-up email to Opposing Counsel re: Stipulation	0.10
3/16/2020	Burlington Merchandising	Send email to Simon Yang re: Status of Stipulation	0.10
4/2/2020	Burlington Merchandising	Review/Analyze email from John Yslas re: CMC Statement	0.10
4/2/2020	Burlington Merchandising	Respond to email from John Yslas re: CMC Statement	0.10
4/2/2020	Burlington Merchandising	Review/Analyze follow up email from John Yslas re: CMC Statement	0.10
4/2/2020	Burlington Merchandising	Respond to follow up email from John Yslas re: CMC Statement	0.10
4/2/2020	Burlington Merchandising	Revise CMC Statement	0.20
4/2/2020	Burlington Merchandising	Send email to Co-Counsel and Opposing Counsel re: CMC Statement	0.10
4/2/2020	Burlington Merchandising	Phone Call with John Yslas re: CMC statement	0.10
4/2/2020	Burlington Merchandising	Review email from Tony Roberts re: CMC Statement	0.10
4/2/2020	Burlington Merchandising	Further revise CMC statement after follow-up conversation with John Yslas	0.10
4/2/2020	Burlington Merchandising	Send email to John Yslas re: CMC Statement	0.10
4/13/2020	Burlington Merchandising	Review/Analyze Press Release re: Closure of facility	0.20
4/13/2020	Burlington Merchandising	Correspondence with Craig Ackermann re: Closure of the facility	0.20
4/20/2020	Burlington Merchandising	Review/Analyze email from Latoia re: [REDACTED]	0.10
4/20/2020	Burlington Merchandising	Send email to staff and Co-Counsel re: [REDACTED]	0.10
4/20/2020	Burlington Merchandising	Respond to email from Client re: [REDACTED]	0.10
4/21/2020	Burlington Merchandising	Phone Call with Client re: [REDACTED]	0.50
5/7/2020	Burlington Merchandising	Draft Informal discovery letter	1.40

5/7/2020	Burlington Merchandising	Send email to Opposing Counsel re: Informal Discovery Letter	0.10
5/27/2020	Burlington Merchandising	Phone Call with Latoia Smith re: [REDACTED]	0.30
6/2/2020	Burlington Merchandising	Review/Analyze email from JB re: Mediation	0.10
6/2/2020	Burlington Merchandising	Respond to email from JB re: Mediation	0.10
6/2/2020	Burlington Merchandising	Review/Analyze email from Craig re: Mediation	0.10
6/2/2020	Burlington Merchandising	Respond to email from Craig re: Mediation	0.10
6/3/2020	Burlington Merchandising	Phone Call with Simon Yang re: Mediation, Informal Discovery, and Other Open Issues	0.50
6/3/2020	Burlington Merchandising	Send email to Co-Counsel re: Phone Call with Simony Yang	0.10
6/3/2020	Burlington Merchandising	Discuss Phone Call with Simon Yang with Craig Ackermann	0.50
6/3/2020	Burlington Merchandising	Review/Analyze email from Dave Mara re: Mediation Brief	0.10
6/3/2020	Burlington Merchandising	Respond to email from Dave Mara re: Mediation and Mediation Brief	0.10
6/12/2020	Burlington Merchandising	Send email to Opposing Counsel re: Stipulation to file FAC	0.10
6/14/2020	Burlington Merchandising	Review/Analyze email from John Yslas re: Service	0.10
6/18/2020	Burlington Merchandising	Attend Mediation and Negotiate Settlement	8.20
6/22/2020	Burlington Merchandising	Send email to Opposing Counsel re: Stipulation to Lift Stay and filing of Amended Complaint	0.10
6/26/2020	Burlington Merchandising	Phone Call with Simon Yang re: MOU and Settlement Approval	0.40
6/28/2020	Burlington Merchandising	Send email to Co-Counsel re: Phone Call with Simon Yang and MOU	0.10
6/28/2020	Burlington Merchandising	Review/Analyze email from Client re: [REDACTED]	0.10
6/28/2020	Burlington Merchandising	Send detailed email to Client re: [REDACTED]	0.40
6/28/2020	Burlington Merchandising	Review/Analyze follow-up email from Client	0.10
6/29/2020	Burlington Merchandising	Revise MOU	0.50
6/29/2020	Burlington Merchandising	Send email to Co-Counsel re: Revisions to MOU	0.10

6/29/2020	Burlington Merchandising	Review/Analyze email from Simon Yang re: MOU	0.10
6/29/2020	Burlington Merchandising	Send email to Opposing Counsel re: Revisions to the MOU	0.10
6/29/2020	Burlington Merchandising	Send follow-up email to client re: [REDACTED]	0.10
6/30/2020	Burlington Merchandising	Send email to Co-counsel re: Hearing dates in San Bernardino	0.10
7/1/2020	Burlington Merchandising	Phone Call with Avi re: Approval Papers and process	0.40
7/1/2020	Burlington Merchandising	Draft Joint Stipulation to Lift Stay	0.50
7/1/2020	Burlington Merchandising	Review/Analyze email from Avi re: PAGA Approval Motion	0.10
7/1/2020	Burlington Merchandising	Respond to email from Avi re: PAGA Approval Motion	0.10
7/1/2020	Burlington Merchandising	Review/Analyze email from Tony Roberts re: Declaration	0.10
7/1/2020	Burlington Merchandising	Review/Analyze email from Avi re: Caption and Approval	0.10
7/1/2020	Burlington Merchandising	Respond to email from Avi re: Caption and Declaration	0.10
7/1/2020	Burlington Merchandising	Discuss Doe Name Amendment Assignment with BB	0.20
7/1/2020	Burlington Merchandising	Follow-up Phone Call with Avi re: Approval and Changes to Motion for Approval	0.20
7/1/2020	Burlington Merchandising	Review/Revise Doe Amendment prepared by BB	0.10
7/1/2020	Burlington Merchandising	Send email to Opposing Counsel re: Notice of Settlement and Stipulation	0.10
7/1/2020	Burlington Merchandising	Send email to BB re: Additional Doe Amendment	0.10
7/1/2020	Burlington Merchandising	Draft Declaration ISO Approval	2.40
7/6/2020	Burlington Merchandising	Phone Call with Avi re: Settlement Approval and Outstanding projects	0.60
7/6/2020	Burlington Merchandising	Phone Call with VM to Simon Yang re: Doe Amendments	0.10
7/7/2020	Burlington Merchandising	Review/Analyze email from Simon Yang re: Revisions to the MOU	0.10
7/7/2020	Burlington Merchandising	Review/Analyze email from Craig Ackermann re: Revisions to the MOU	0.10
7/7/2020	Burlington Merchandising	Revise MOU based upon comments from Co-Counsel	0.10

7/7/2020	Burlington Merchandising	Send email to Opposing Counsel re: Revisions to MOU	0.10
7/7/2020	Burlington Merchandising	Send email to Opposing Counsel re: Amended PAGA Notices	0.10
7/7/2020	Burlington Merchandising	Review/Analyze email from Opposing Counsel re: Amended PAGA Notices	0.10
7/7/2020	Burlington Merchandising	Respond to email from Opposing Counsel re: Amended PAGA Notice and Stipulation to Continue Status Conference	0.10
7/7/2020	Burlington Merchandising	Phone Call with Avi re: Correspondence with Opposing Counsel and PAGA Notices	0.10
7/12/2020	Burlington Merchandising	Send email to Latoia smith re: [REDACTED]	0.10
7/12/2020	Burlington Merchandising	Send detailed email to client re: Status of the Case, Settlement Issues, and preparation of documents	0.90
7/13/2020	Burlington Merchandising	Phone Call with VM to Simon Yang re: Additional Documents that Need to Be Filed	0.10
7/15/2020	Burlington Merchandising	Send email to Simon Yang re: Filing of the FAC and Doe Amendments	0.10
7/17/2020	Burlington Merchandising	Finalize and oversee filing of Doe Amendments including multiple Amendments to proofs of service for each document prepared by staff	0.90
7/21/2020	Burlington Merchandising	Review/Analyze email from Simon re: MOU	0.10
7/21/2020	Burlington Merchandising	Respond to email from Simon Yang re: MOU	0.10
7/21/2020	Burlington Merchandising	Review/Analyze email from Avi re: MOU	0.10
7/21/2020	Burlington Merchandising	Respond to email from Avi re: MOU via text	0.10
7/21/2020	Burlington Merchandising	Phone Call with MG re: MOU and contact with clients	0.20
7/22/2020	Burlington Merchandising	Discuss obtaining signatures from Co-Counsel with MG now that clients have signed	0.10
7/22/2020	Burlington Merchandising	Send email to JB and Craig Ackermann re: MOU	0.10
7/22/2020	Burlington Merchandising	Review/Analyze email from JB re: CMC Statement	0.10
7/22/2020	Burlington Merchandising	Respond to email from JB re: CMC Statement	0.10
7/23/2020	Burlington Merchandising	Review/Analyze email from Avi re: Declaration	0.10
7/23/2020	Burlington Merchandising	Respond to email from Avi re: Declaration	0.10
7/23/2020	Burlington Merchandising	Review/Analyze follow-up email from Avi re: Declaration	0.10

7/24/2020	Burlington Merchandising	Draft detailed Complex CMC Statement	1.30
7/24/2020	Burlington Merchandising	Review/Analyze docket in preparation of drafting CMC Statement	0.40
7/24/2020	Burlington Merchandising	Send detailed email to Opposing Counsel re: CMC Statement and Stipulation	0.20
7/24/2020	Burlington Merchandising	Send email to JB re: MOU	0.10
7/24/2020	Burlington Merchandising	Review/Analyze email from JB re: MOU	0.10
7/24/2020	Burlington Merchandising	Phone Call with Raymond Jones re: [REDACTED]	0.40
7/28/2020	Burlington Merchandising	Phone Call with VM to Simon Yang re: CMC Statement	0.10
7/29/2020	Burlington Merchandising	Phone Call with John Yslas re: CMC Statement and Procedural Issues	0.40
7/29/2020	Burlington Merchandising	Send email re: CMC	0.10
7/29/2020	Burlington Merchandising	Follow-up Phone Call re: CMC Statement and MOU	0.10
7/29/2020	Burlington Merchandising	Send detailed email to Co-Counsel re: CMC statement, long form, and procedural issues	0.20
7/29/2020	Burlington Merchandising	Phone Call with Avi re: CMC Statement and other issues	0.10
7/29/2020	Burlington Merchandising	Phone Call with VM to John Yslas re: CMC Issues	0.10
7/29/2020	Burlington Merchandising	Review/Analyze new complex court guidelines for San Bernardino	0.10
7/29/2020	Burlington Merchandising	Review/Analyze email from Dave Mara re: MOU	0.10
7/29/2020	Burlington Merchandising	Review/Analyze email from Tony Roberts re: CMC Statement and Notice of Settlement	0.10
7/30/2020	Burlington Merchandising	Review/Analyze email from John Yslas re: CMC Statement and Stipulation	0.10
7/30/2020	Burlington Merchandising	Phone Call with Avi re: Approval Package, preparation, and Issues	0.90
7/30/2020	Burlington Merchandising	Review/Analyze email from Avi re: Filing of CMC statement and notice of settlement/stipulation	0.10
7/30/2020	Burlington Merchandising	Review/Analyze email from Avi re: Approval Papers	0.10
7/30/2020	Burlington Merchandising	Review/Analyze email from JB re: Status of Settlement docs and next steps	0.10
7/30/2020	Burlington Merchandising	Respond to email from JB re: Status of Settlement docs and next steps	0.10

7/30/2020	Burlington Merchandising	Review/Analyze email from Avi re: Settlement documents and draft motion to opposing counsel	0.10
8/4/2020	Burlington Merchandising	Review/Analyze email from Dave Mara re: Simon Yang and Settlement process	0.10
8/4/2020	Burlington Merchandising	Review/Analyze email from John Yslas re: Settlement Package	0.10
8/4/2020	Burlington Merchandising	Send email to Co-Counsel re: Settlement Approval and Review	0.10
8/5/2020	Burlington Merchandising	Review/Analyze email from Avi to John Yslas re: Settlement Package	0.10
8/5/2020	Burlington Merchandising	Phone Call with Avi re: Settlement Papers and CMC	0.40
8/5/2020	Burlington Merchandising	Revise Declaration In Support to Incorporate new cases and costs	0.20
8/5/2020	Burlington Merchandising	Prepare Exhibit with Costs and Redact sensitive information	0.90
8/7/2020	Burlington Merchandising	Review/Analyze email from Client re: [REDACTED]	0.10
8/7/2020	Burlington Merchandising	Send detailed email to Client re: [REDACTED]	0.20
8/7/2020	Burlington Merchandising	Review/Analyze follow-up email from Client re: [REDACTED]	0.10
8/13/2020	Burlington Merchandising	Review/Analyze email from Co-Counsel re: CMC and Approval Hearing	0.10
8/17/2020	Burlington Merchandising	Revise Email Prepped by BB to use for Case Anywhere	0.10
8/17/2020	Burlington Merchandising	Send email to Avi re: Case Anywhere	0.10
8/17/2020	Burlington Merchandising	Review/Analyze email from Avi re: Case Anywhere and CMC	0.10
8/17/2020	Burlington Merchandising	Respond to email from Avi re: Case Anywhere	0.10
8/18/2020	Burlington Merchandising	Phone Call with Avi re: Amendments to Settlement Agreement and approval process	0.20
8/25/2020	Burlington Merchandising	Review/Analyze email from Latoia re: [REDACTED]	0.10
8/25/2020	Burlington Merchandising	Send email to Avi re: Court docket and next hearing	0.10
8/25/2020	Burlington Merchandising	Review/Analyze email from Avi re: Next Court hearing and last CMC	0.10
8/25/2020	Burlington Merchandising	Review/Analyze email from Tony Roberts re: CMC hearing and note on the Court docket	0.10
8/25/2020	Burlington Merchandising	Draft/Revise Declaration of Latoia Smith ISO Settlement	1.20

8/25/2020	Burlington Merchandising	Draft/Revise Declaration of Raymond Jones ISO Settlement	0.70
8/26/2020	Burlington Merchandising	Send email to Latoia Smith re: [REDACTED]	0.10
8/26/2020	Burlington Merchandising	Phone Call with Latoia Smith re: [REDACTED]	0.50
8/27/2020	Burlington Merchandising	Review/Analyze email from Avi re: Settlement Agreement	0.10
8/27/2020	Burlington Merchandising	Respond to email from Avi re: Settlement Agreement	0.10
8/27/2020	Burlington Merchandising	Review/Analyze email from Dave Mara re: Settlement Agreement	0.10
8/27/2020	Burlington Merchandising	Revise Declaration of Latoia Smith re: [REDACTED]	0.20
8/27/2020	Burlington Merchandising	Phone Call with Latoia Smith re: [REDACTED]	0.60
9/1/2020	Burlington Merchandising	Review/Analyze email from John Yslas re: Settlement Agreement	0.10
9/1/2020	Burlington Merchandising	Review/Analyze email from Dave Mara re: Settlement Agreement	0.10
9/1/2020	Burlington Merchandising	Review/Analyze email from Avi re: Settlement Agreement	0.10
9/1/2020	Burlington Merchandising	Review/Analyze email from JB re: Settlement Agreement	0.10
9/1/2020	Burlington Merchandising	Respond to email from JB re: Settlement Agreement	0.10
TOTALS			82.50
