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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF RIVERSIDE**

ROSALBA RAMIREZ, as an individual and  
on behalf of all others similarly situated,

Plaintiff,

vs.

MOLDED DEVICES, INC., a California  
corporation; and DOES 1 through 100,  
inclusive,

Defendants.

Case No. RIC2001161

*[Assigned to the Honorable Craig G. Riemer in  
Dept. 1]*

**DECLARATION OF ELIZABETH NGUYEN IN  
SUPPORT OF MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT, CLASS REPRESENTATIVE'S  
SERVICE AWARD, AND ATTORNEYS' FEES  
AND COSTS**

Date: February 15, 2022  
Time: 8:30 a.m.  
Dept.: 1

Complaint Filed: March 11, 2020  
Trial Date: None Set

1 I, ELIZABETH NGUYEN, declare as follows:

2 1. I am a shareholder of the law firm Lidman Law, APC, and counsel for the named Plaintiff  
3 Rosalba Ramirez (“Plaintiff”) and the proposed Settlement Class in the above-captioned matter. I am  
4 a member in good standing of the bar of the State of California and am admitted to practice in this Court.  
5 I have personal knowledge of the facts stated in this declaration and could testify competently to them  
6 if called upon to do so.

7 2. I am a 2005 graduate of Loyola Law School. During law school, I worked as an extern  
8 for the Honorable Erithe A. Smith, U.S. Bankruptcy Court for the Central District of California. During  
9 law school, I also worked as a law clerk in the Enforcement Unit of the Office of the Chief Trial Counsel  
10 for the State Bar of California.

11 3. Since graduating from law school, my practice has focused almost exclusively on  
12 employment litigation. In October 2007, I began working as an associate attorney at the international  
13 law firm of Littler Mendelson P.C., at its Los Angeles office, which according to its website is the  
14 “largest law firm in the world exclusively devoted to representing management in employment,  
15 employee benefits and labor law matters.”

16 4. In June 2012, I left Littler Mendelson to work at the Los Angeles office of Reed Smith  
17 LLP. During my employment at Reed Smith, I worked exclusively in the labor and employment  
18 practice group. In June 2013, I returned to Littler Mendelson as an associate attorney, was promoted to  
19 Shareholder in 2015, and was elevated to participating Shareholder in 2017. Since October 2007, my  
20 practice has been and continues to be exclusively labor and employment law, with a strong emphasis  
21 on wage and hour class actions venued in both state and federal courts. During this time period and my  
22 legal career in general, I also worked on a number of single and multi-plaintiff wage and hour matters  
23 as well. During my employment at Littler Mendelson, I was a member of its Class Action Practice  
24 Group.

25 5. During my employment at Littler Mendelson, I played a significant role in the class  
26 actions that I was staffed on, and was primarily responsible for managing the litigation both in my role  
27 as a Senior Associate and as a Shareholder. In particular, I received a wide-array of wage and hour  
28 class action experience performing the following types of tasks: drafting demurrers, motions to strike

1 and/or dismiss; removing actions from state court to federal court; drafting and responding to written  
2 discovery; drafting and opposing discovery related motions; arguing discovery related motions; drafting  
3 motions to consolidate related matters; interviewing putative class members and obtaining declarations  
4 in connection with class certification; drafting oppositions to motions for class certification; conducting  
5 exposure analyses to assess the strengths and weaknesses of asserted claims, the likelihood of prevailing  
6 at class certification and potential damages resulting from such claims; drafting mediation briefs;  
7 serving as the primary contact to in-house counsel; deposing named plaintiffs and putative class  
8 members; deposing retained expert witnesses; and defending the depositions of corporate witnesses. I  
9 also was involved in the negotiations and settlements of many large wage and hour class actions. In  
10 short, I played an integral role in all aspects of litigation from the inception of a matter through and  
11 beyond class certification. I also supervised the work of several associate attorneys who were staffed  
12 on the same wage and hour class actions.

13 6. Although not exhaustive, below is a list of many of the wage and hour class and PAGA  
14 actions that I performed substantial work on while I was an Associate and/or Shareholder at Littler  
15 Mendelson:

- 16 ► *Branch v. PM Realty Group, Inc.* Case No. BC575759, Los Angeles Superior  
17 Court, County of Los Angeles, Honorable Ann Jones, presiding.
- 18 ► *Herrera v. Pharmavite, LLC*, Case No. BC599201, Los Angeles Superior Court,  
19 County of Los Angeles, Honorable Judge Carolyn Kuhl, presiding.
- 20 ► *Dugan v. Stoneledge Furniture, LLC*, Case No. 16-cv-01125-PA-FFMx, United  
21 States District Court, Central District of California, Honorable Judge Percy  
22 Anderson, presiding.
- 23 ► *Klune v. Stoneledge Furniture, LLC*, Case No. 14-cv-03986-PA-FFMx, United  
24 States District Court, Central District of California, Honorable Judge Percy  
25 Anderson, presiding.

- 1           ▶ *Diaz v. ABM Industries, Inc.; Ampco Parking*, Case No. BC362932, California  
2           Superior Court, County of Los Angeles, Honorable Judge Jane Johnson,  
3           presiding.<sup>1</sup>
- 4           ▶ *Adams v. Luxottica Retail North America, Inc.*, Case No. 07CC01346, California  
5           Superior Court, County of Orange, Honorable Judge Thierry Patrick Colaw,  
6           presiding.
- 7           ▶ *Page v. Luxottica Retail North America, Inc.*, Case No. FCS041512, California  
8           Superior Court, County of Solano, Honorable Judge Paul Berman, presiding.
- 9           ▶ *Parker v. FedEx National LTL, Inc.*, Case No. 11-CV-006380-DSF-FFM, United  
10          States District Court, Central District of California, Honorable Judge Dale  
11          Fischer, presiding.
- 12          ▶ *Cordova v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United  
13          States District Court, Central District of California, Honorable Judge Margaret  
14          Morrow, presiding.
- 15          ▶ *Bernal v. Comerica Bank, et al.*, Case No. 11-cv-01298-JAH-BGS, United States  
16          District Court, Central District of California, Honorable Judge Margaret Morrow,  
17          presiding.
- 18          ▶ *Granata v. Comerica Bank, et al.*, Case No. 37-2011-00086316-CU-OE-CTL,  
19          California Superior Court, County of San Diego, Honorable Judge Jeffrey B.  
20          Barton, presiding.
- 21          ▶ *Mathews v. Comerica Bank, et al.*, Case No. 111CV194781, California Superior  
22          Court, County of Santa Clara.
- 23          ▶ *Gallegos v. Comerica Bank, et al.*, Case No. BC455515, California Superior  
24          Court, County of Los Angeles, Honorable Judge Terry Green, presiding.
- 25          ▶ *Rumohr v. Comerica Bank, et al.*, Case No. CGC-11-508433, California Superior  
26          Court, County of San Francisco.

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<sup>1</sup> This matter was consolidated and litigated collectively with Case Nos. BC380923, BC 381523 and BC 406663.

1           ▶     *Robertson v. FedEx National LTL, Inc.*, Case No. 09-CV-05016-DSF-FFM,  
2                     United States District Court, Central District of California, Honorable Judge Dale  
3                     Fischer, presiding.

4           ▶     *Wittman v. FedEx National LTL, Inc.*, Case No. 09-CV-03663-DSF-FFM, United  
5                     States District Court, Central District of California, Honorable Judge Dale  
6                     Fischer, presiding.

7           7.     In January 2018, I voluntarily resigned from Littler Mendelson in order to start a law  
8     firm with another former Littler Mendelson Shareholder, Scott M. Lidman, to represent employees  
9     with work-related claims, including primarily wage and hour claims and almost exclusively on a class-  
10    action basis. I am currently a Shareholder of Lidman Law, APC. Currently, over ninety percent (90%)  
11    of my practice is dedicated exclusively to the prosecution of wage and hour class actions, and I am  
12    currently responsible for prosecuting over sixty-five (65) wage and hour class actions filed in State  
13    courts throughout California, with several of them having been removed to Federal courts. I believe  
14    that my professional experience renders me more than qualified to serve as class counsel in this lawsuit  
15    involving claims of underpaid overtime and minimum wages, meal and rest period violations, and  
16    derivative penalty claims. Not only have I litigated dozens of wage and hour cases throughout my  
17    career involving similar claims, including the wage and hour class actions identified above, I have  
18    litigated similar claims from both plaintiff and defense perspectives. As a result, I am able to  
19    realistically assess and evaluate the facts and legal arguments that can be made in pursuit and defense  
20    of similar wage and hour claims, as well as those facts and arguments in support and in opposition to  
21    class certification. Consequently, I am able to appreciate the significant risks, uncertainties, and delay  
22    involved in wage and hour class action litigation.

23          8.     I have been appointed Class Counsel in: *Guardado v. Wesley Allen, Inc.*, Case No.  
24    BC683027, California Superior Court, County of Los Angeles, Honorable Judge Carolyn B. Kuhl  
25    presiding; *Rodriguez v. Satco, Inc.*, Case No. BC682137, California Superior Court, County of Los  
26    Angeles, Honorable Judge Ann I. Jones presiding; *Ong v. Howard's Appliances, Inc.*, Case No. 30-  
27    2017-00964213-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge  
28    William Claster presiding; *Hanke v. C&W Facility Services, Inc.*, Case No. CIVDS1814412,

1 California Superior Court, County of San Bernardino, Honorable Judge David Cohn presiding; *Molina*  
2 *v. Mader News, Inc.*, Case No. BC685960, California Superior Court, County of Los Angeles,  
3 Honorable Judge Yvette M. Palazuelos presiding; *Alvarez v. Salamander Fire Protection, Inc.*, Case  
4 No. BC688326, California Superior Court, County of Los Angeles, Honorable Judge William F.  
5 Highberger presiding; *Rodriguez v. H.F. Cox, Inc.*, Case No. BC653164, California Superior Court,  
6 County of Los Angeles, Honorable Judge Carolyn B. Kuhl presiding; *Fregoso v. Amerigas Propane,*  
7 *Inc.*, Case No. BC697973, California Superior Court, County of Los Angeles, Honorable Judge Rafael  
8 A. Ongkeko presiding; *Teran v. Western Plastics, Inc.*, Case No. RIC1722619, California Superior  
9 Court, County of Riverside, Honorable Judge Sunshine Sykes presiding; *Villegas de Torres v. El*  
10 *Monte Superstore Inc.*, Case No. BC688477, California Superior Court, County of Los Angeles,  
11 Honorable Judge Daniel J. Buckley presiding; *Huynh v. Polypeptide Laboratories, Inc.*, Case No.  
12 BC680872, California Superior Court, County of Los Angeles, Honorable Judge Rafael A. Ongkeko  
13 presiding; *Guzman v. Century Blinds*, Case No. RIC1723654, California Superior Court, County of  
14 Riverside, Honorable Judge Sunshine S. Sykes presiding; *George v. Convergence Marketing*, Case  
15 No. CIVDS1901039, California Superior Court, County of San Bernardino, Honorable Judge David S.  
16 Cohn presiding; *Coffee, et al. v. Flyers Transportation Energy, LLC*, Case No. 34-2017-00222084,  
17 California Superior Court, County of Sacramento, Honorable Judge Alan G. Perkins presiding; *Romero*  
18 *v. Fillmore Hospitality, LLC*, Case No. BC705667, California Superior Court, County of Los Angeles,  
19 Honorable Judge Maren E. Nelson presiding; *Wennerstrom, et al. v. Giant Inland Empire R.V. Center*,  
20 Case No. CIVDS1617291, California Superior Court, County of San Bernardino, Honorable Judge  
21 David S. Cohn presiding; *Contreras, et al. v. Letter Ride, LLC*, Case No. 37-2018-00020841-CU-OE-  
22 CTL, California Superior Court, County of San Diego, Honorable Judge Eddie C. Sturgeon presiding;  
23 *Davis v. WeDriveU*, Case No. 18CV322578, California Superior Court, County of Santa Clara,  
24 Honorable Judge Brian C. Walsh presiding; *Acuna v. Canton Food Co., Inc.*, Case No. BC685001,  
25 California Superior Court, County of Los Angeles, Honorable Judge David S. Cunningham presiding;  
26 and *Contreras v. Worldwide Flight Services, Inc.*, Case No. 2:18-cv-06036-PSG-SS, United States  
27 District Court for the Central District of California, the Honorable Judge Philip S. Gutierrez presiding.  
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1           9.       As co-counsel for Plaintiff and the proposed Settlement Class, I have been intimately  
2 involved in every aspect of this case from its inception through the present, and I believe that the  
3 proposed Settlement is a favorable result for the Settlement Class under the circumstances presented.

4           10.      On March 11, 2020 Plaintiff filed a putative class action complaint against Defendant  
5 Molded Devices, Inc. (“MDI” or “Defendant”) in Riverside County Superior Court. On June 1, 2020,  
6 Plaintiff filed a First Amended Class and Representative Action Complaint (“FAC”) against Defendant  
7 MDI. In the FAC filed on June 1, 2020, Plaintiff alleged MDI: (1) failed to pay all minimum wages  
8 owed; (2) failed to pay all overtime wages owed; (3) failed to provide all legally required meal periods;  
9 (4) failed to authorize and permit all legally required rest periods; (5) failed to provide accurate, itemized  
10 wage statements; (6) failed to timely pay all wages upon termination; (7) engaged in unlawful business  
11 practices; and (8) is liable for civil penalties under the Labor Code Private Attorneys General Act of  
12 2004 (“PAGA”).

13           11.      As explained in detail in the Motion for Preliminary Approval, Plaintiff’s primary  
14 theories of liability are related to MDI’s alleged unlawful wage and timekeeping policies and practices  
15 and its failure to provide Class Members all legally compliant duty-free meal and rest periods.  
16 Specifically, Plaintiff alleges that MDI failed to compensate its non-exempt employees for all time  
17 worked. Specifically, Plaintiff alleges that MDI failed to pay Plaintiff for all of the time she was under  
18 MDI’s direction or control. As a result of MDI’s timekeeping policies and practices, Plaintiff was  
19 routinely underpaid for all her time worked.

20           12.      MDI contends that it compensated non-exempt employees for all of their time worked.  
21 MDI also contends that its timekeeping and payroll documents produced in connection with mediation  
22 demonstrate that employees were minute to the minute. MDI contends its timekeeping practices and  
23 policies were lawful and any unpaid time was *de minimis* and therefore non-compensable. MDI also  
24 asserts that Plaintiff would be unable to certify a rounding claim given the individualized inquiries that  
25 would be required.

26           13.      Plaintiff alleges that at times during her employment with MDI, she and other non-  
27 exempt employees were paid non-discretionary bonuses, (hereinafter the aforementioned forms of pay  
28 are collectively referred to as “Incentive Pay”). Plaintiff alleges that MDI failed, however, to include

1 the Incentive Pay when calculating the regular rate of pay for purposes of paying Plaintiff and the other  
2 non-exempt employees' overtime wages. Accordingly, Plaintiff contends that MDI did not properly  
3 calculate the regular rate of pay for Plaintiff and the other non-exempt employees, thereby causing  
4 them to be underpaid for all their required overtime wages.

5 14. MDI contends that Settlement Class members received all overtime wages to which  
6 they were entitled. MDI further counters that any bonuses paid to putative class members during the  
7 relevant time period were discretionary and did not to be included in the regular rate of pay for overtime  
8 purposes.

9 15. Plaintiff alleges that she and Settlement Class members were not provided with all  
10 legally-required off-duty first meal periods beginning before the end of the fifth hour of work.  
11 Specifically, Plaintiff alleges that due to the work demands imposed by MDI, Plaintiff was often  
12 prevented from taking meal periods that commenced before the end of the 5<sup>th</sup> hour of work and/or  
13 which were at least 30 minutes in length. Indeed, based on the timekeeping records produced in  
14 connection with mediation, of the 42,505 meal-enabling shifts, 13,239 or approximately 31.15% were  
15 non-compliant. Also, Plaintiff alleges that she and other non-exempt employees did not receive  
legally-compliant second meal periods when they worked in excess of 10.0 hours.

16 16. MDI counters that it has always provided non-exempt employees with an opportunity  
17 to take legally compliant meal periods, and any non-compliant meal periods reflected in employee  
18 timekeeping records were solely the result of employee choice, rather than any policy or practice of  
19 MDI. There is also an argument that the above analysis potentially counts two meal period violations  
20 for the same shift, but under *United Parcel Service, Inc. v. Superior Court* (2011) 196 Cal. App. 4th  
21 57, only one meal period violation may be assessed per day. MDI points out that it is only required to  
22 "provide" the opportunity to take meal periods, not "ensure" meal periods are taken, and that they have  
23 always done so. Finally, MDI contends Plaintiff's meal period claim is not suited for class certification,  
24 since individual inquiries would be required to assess which employees took non-compliant meal  
25 periods, how many meal periods were non-compliant or missed, and the reasons why a particular  
26 employee took a non-compliant meal period or missed a meal period during a particular shift.

27 17. Plaintiff alleges that she and other Settlement Class members were not authorized and  
28 permitted to take all required rest periods due to MDI's unlawful rest period policies and practices that  
failed to authorize and permit all rest periods for every four hours worked, *or major fraction thereof*.

1 Specifically, Plaintiff alleges that during her employment, MDI maintained a facially unlawful rest  
2 period policy that required employees to remain on the premises for rest breaks. Such alleged rest  
3 periods were unlawful, however, as Plaintiff was not relieved of all duties. As a result, Plaintiff  
4 estimated that she and other Settlement Class members experienced at least one rest period violation  
5 for every shift over 3.5 hours.

6 18. MDI contends it has always maintained and enforced lawful rest period policies and  
7 practices, and that Settlement Class Members were authorized and permitted to take all off-duty rest  
8 periods in compliance with California law. Further, MDI argues that Plaintiff's rest period claims are  
9 inherently unsuited for class treatment as it requires an individualized inquiry into whether each  
10 Settlement Class member was in fact authorized and permitted to take a compliant rest period, which  
11 would devolve into an unmanageable series of mini-trials.

12 19. Plaintiff further alleges that MDI issued inaccurate wage statements in violation of Labor  
13 Code § 226 as a result of the alleged unpaid wages and meal and rest period premium wages described  
14 above. Specifically, Plaintiff contends that this conduct violated Labor Code § 226(a) because the wage  
15 statements issued to Settlement Class Members did not include all hours worked and the rate at which  
16 they were being paid. Additionally, Plaintiff alleges that MDI faces independent liability for issuing  
17 wage statements with vague and ambiguous codes, including without limitation, "Retro OT" as  
18 Defendants fail to state the time period covered by the code. Further, despite the use of the "RETRO  
19 OT" pay code, Plaintiff's retained expert confirmed that MDI did not include bonuses in the regular rate  
20 at any point in time, which further suggests using this pay code is vague and ambiguous code.

21 20. MDI argues that meal and rest period claims cannot support a claim for wage statement  
22 penalties. MDI further argues that its alleged wage statement violations could not be shown to be  
23 "knowing and intentional," and that Plaintiff cannot show that she or any other employee "suffer[ed]  
24 injury" as a result of the alleged wage statement violations, as required by Lab. Code § 226(e) for  
25 imposition of penalties.

26 21. Plaintiff alleges that MDI is also liable for waiting time penalties under Labor Code  
27 section 203 as a result of its failure to pay all wages. Based on the data provided by MDI, there were  
28

1 approximately 88 Settlement Class members who have separated their employment with MDI during  
2 the relevant time period who could be entitled to waiting time penalties.

3 22. MDI asserts it has strong defenses to the waiting time claim because there exist good-  
4 faith disputes as to Plaintiff's underlying claims, precluding imposition of penalties.

5 23. Plaintiff also seeks civil penalties under the PAGA as a result of the foregoing alleged  
6 Labor Code violations. The specific statutory violations upon which Plaintiff bases the claim under  
7 PAGA are: (i) Labor Code sections 204, 510, 558, 1194, and 1198 for failing to pay all overtime wages  
8 owed; (ii) Labor Code sections 1194 1194.2, 1197 for failing to pay all minimum wages owed; (iii)  
9 Labor Code sections 226.7, 512, and 558 for meal period violations; (iv) Labor Code sections 226.7,  
10 516, and 558 for rest period violations; (v) Labor Code section 226(e) for failing to provide accurate,  
11 itemized wage statements; (vi) Labor Code section 201 through 203 for failing to pay all wages owed  
12 upon termination.

13 24. Lastly, since Plaintiff's PAGA claim is a derivative claim based on the underlying  
14 claims, MDI argues that Plaintiff's PAGA claim will fail for the same reasons that her underlying  
15 claims will fail. MDI also maintains that, given its good faith defenses, this Court would exercise its  
16 discretion to substantially reduce any PAGA penalties if it were to find MDI liable for any of Plaintiff's  
17 claims.

18 25. These considerations not only bore heavily on the negotiations leading to the  
19 Settlement, but also confirm that the Settlement is fair, adequate, and reasonable compromise in view  
20 of the risks of further litigation. As detailed in the Preliminary Approval Motion, Plaintiff carefully  
21 vetted the claims at issue and conducted a detailed liability analysis of class-wide data to calculate the  
22 damages figures. Thus, while these risks are far from exhaustive, they demonstrate that the Settlement  
23 is fair, adequate, and reasonable in view of them.

24 26. After agreeing to participate in early mediation, MDI informally produced a sampling  
25 of time records and payroll data for the class members, wage and hour policies, and other relevant  
26 documents and information relevant to the claims. After the detailed review of the payroll and time  
27 records and other documents and policies produced by MDI, Class Counsel drew on their extensive  
28

1 experience in similar cases to assess the strengths and weaknesses of Plaintiff's case. This discovery  
2 allowed the parties to assess the merits and value of Plaintiff's claims.

3 27. On February 11, 2021 after extensive research and analysis, including a detailed  
4 analysis of MDI's potential exposure, a full-day mediation was held with Jeffrey Krivis, Esq. a well-  
5 respected wage and hour class action mediator. During mediation, the parties vigorously debated their  
6 opposing legal positions, the likelihood of certification of Plaintiff's claims, and the legal basis for the  
7 claims and defenses for the claims alleged in the operative complaint.

8 28. Plaintiff submitted the Settlement to the Court with her Motion for Preliminary  
9 Approval on April 26, 2021. On July 7, 2021, the Court issued its ruling on Plaintiff's Motion for  
10 Preliminary Approval. On August 18, 2021, Plaintiff submitted an Amended Stipulation of Settlement  
11 and Supplemental Brief In Support of her Motion for Preliminary Approval of the Settlement. On  
12 October 8, 2021, the Court issued an Order Granting Preliminary Approval of the Settlement. Attached  
13 hereto as **Exhibit A** is a true and correct copy of the on October 8, 2021, Order Granting Preliminary  
14 Approval.

15 29. The Settlement Class encompasses "all current and former hourly employees of  
16 Defendant Molded Devices who worked in California at some time between March 11, 2016 and  
17 February 13, 2021."

18 30. Funds remaining unclaimed will be distributed to the California State Controller's  
19 Office – Unclaimed Property Fund in the name of the Settlement Class member. As such, there is no  
20 "unpaid residue" under California Civil Procedure Code Section 384, I believe it is unnecessary to  
21 designate *cy pres* recipients. The Net Settlement Amount will be paid out to Settlement Class members,  
22 whether or not all checks are cashed.

23 31. In my experience in wage and hour class action matters similar to this one, fee awards  
24 generally average around one-third of the gross recovery.

25 32. My law firm's and co-counsel's work on this case includes, but is not limited to:  
26 conducting pre-filing investigation, analyzing Plaintiff's claims, conducting legal research, reviewing  
27 MDI's documents and policies, analyzing Settlement Class members' timekeeping data and payroll  
28 records, preparing for and attending mediation, negotiating and revising the long-form Settlement and

1 Amended Settlement, preparing the Motions for Preliminary and Final Approval, overseeing the  
2 settlement administration process, communicating with Settlement Class members, and otherwise  
3 litigating this case.

4 33. Since undertaking representation of Plaintiff, my co-counsel's firm, Haines Law Group,  
5 APC, has incurred all of the costs in this litigation, without receiving any compensation to date. To  
6 date, my co-counsel's firm has incurred \$18,216.49 in actual costs (and expects to incur approximately  
7 \$200 in anticipated future costs<sup>2</sup>) for a total of \$18,416.49 in litigation costs. <sup>3</sup> I am informed and  
8 believe, and on that basis state, that my co-counsel's costs summary in this matter is attached to the  
9 declaration of Paul K. Haines filed concurrently herewith as Exhibit A and that itemization of the costs  
10 incurred in this matter. For the Court's convenience I have also attached a copy of the summary of the  
11 itemization of costs as **Exhibit B**.

12 34. My experience in matters similar to this one was integral in evaluating the strengths and  
13 weaknesses of this case and the reasonableness of the Settlement. Practice in the narrow field of wage  
14 and hour litigation requires skill and knowledge concerning the rapidly evolving substantive state and  
15 federal law, as well as the procedural law of class action litigation.

16 35. Given the considerable potential for adverse outcomes in this case, including, but not  
17 limited to losing on class certification and/or merits issues, or Defendant attempting to obtain individual  
18 releases for a fraction of what Settlement Class members are receiving through this Settlement.  
19 Therefore, the contingent risk borne by Class Counsel was great. In addition to the legal and procedural  
20 challenges this lawsuit presented, there were also other practical challenges. There was a real risk that  
21 my firm and co-counsel's firm would not be compensated for our work, because our firms handled this  
22 matter on a purely contingent basis. Thus, Plaintiff was not responsible for paying my firm's attorneys'  
23 fees and my firm could only recover attorneys' fees if Plaintiff was successful. By the time I (or  
24 someone from my firm) attend the final approval hearing in this matter, my firm and co-counsel firm  
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26 <sup>2</sup> My co-counsel's firm, Haines Law Group, APC, expects to incur approximately \$200 in future costs for filing  
27 the instant motion, filing the final declaration regarding distribution of settlement, service and messenger fees,  
postage fees, and/or costs for future court appearances.

28 <sup>3</sup> Please note, this expressly excludes the \$70.43 incurred in connection with Plaintiff's supplemental brief in  
support of her motion for final approval. Per CMO section I.4.d., Plaintiff is not seeking reimbursement of such  
costs.

will have litigated this case for over one and a half years with no payment, all while bearing the risk of non-payment if Plaintiff was unsuccessful. Moreover, as discussed above, my co-counsel, Haines Law Group, APC, has already advanced in excess of \$18,216.49 (and anticipate incurring an additional \$200 in hard costs in connection with filing the instant motion, filing the final declaration regarding distribution of settlement, service and messenger fees, postage fees, and/or costs for future court appearances) for a total of \$18,416.49 in litigation costs on a contingency basis, which also carried risk because my co-counsel would not recoup its costs in the event Plaintiff did not prevail in this lawsuit.

36. My law firm maintains records of our hours worked on this case by billing our time in increments of one-tenth (1/10) of an hour into a timekeeping system. I access the timekeeping system regularly for purposes of assessing the number of attorney and paralegal hours worked for each case that my law firm handles. I relied on the timekeeping records for this case to prepare this declaration. A true and correct copy of my law firm's billing records are attached hereto as **Exhibit C**. The report is partially redacted to protect attorney-client communications and attorney work product.

37. The lodestar cross-check also supports Class Counsel's request for attorneys' fees is reasonable. In this case, after adding in the attorney hours for my firm (\$114,295.00) and my co-counsel's firm (\$10,140.00), Class Counsel have a total lodestar of \$124,435.00 without the use of any multiplier. Therefore, the lodestar is actually significantly higher than the \$116,666.66 fee request. The following is a general summary showing the number of hours of work performed by each attorney and paralegal in my firm on this case. My co-counsel's billing records and summary are discussed in the Declaration of Paul K. Haines filed in support of this motion.

| Name                                     | Billing Initials | Rate  | Hours | Pre-Multiplier Lodestar |
|------------------------------------------|------------------|-------|-------|-------------------------|
| Scott M. Lidman<br>(23rd Year Attorney)  | SML              | \$750 | 29.1  | \$21,825.00             |
| Elizabeth Nguyen<br>(16th Year Attorney) | ECN              | \$650 | 50.9  | \$33,085.00             |
|                                          |                  |       |       |                         |
| Milan Moore<br>(6th Year Attorney)       | MLM              | \$400 | 135.6 | \$54,240.00             |
| Paralegals                               | DJ               | \$175 | 29.4  | \$5,145.00              |
| <b>Lodestar for Lidman Law</b>           |                  |       |       | <b>\$114,295.00</b>     |

|                                        |     |       |      |                    |
|----------------------------------------|-----|-------|------|--------------------|
| Paul K. Haines<br>(15th Year Attorney) | PKH | \$650 | 15.6 | \$10,140.00        |
| <b>Lodestar for Haines Law Group</b>   |     |       |      | <b>\$10,140.00</b> |

|                                                           |  |  |  |                     |
|-----------------------------------------------------------|--|--|--|---------------------|
| <b>Total Lodestar for Lidman Law and Haines Law Group</b> |  |  |  | <b>\$124,435.00</b> |
|-----------------------------------------------------------|--|--|--|---------------------|

38. My proposed hourly rate of \$650, Mr. Lidman's proposed hourly rate of \$750, Mr. Haines' proposed hourly rate of \$650, and Ms. Moore's proposed hourly rate of \$400 are reasonable in light of our respective skills, wage and hour class action litigation experience, reputation, and fee awards to other attorneys of similar experience in California. Moreover, our requested hourly rates are in line with the *Laffey* Matrix, a true and correct copy of which is attached hereto as **Exhibit D**.

39. The attorneys' fee award requested is consistent with those routinely awarded by California superior courts. California superior courts frequently grant common fund awards of 33%. *See, e.g., Ochoa v. Haralambos Beverage Co.*, No. BC319588 (Super. Ct., Los Angeles County, Feb. 1, 2007) (33.3% fee award with no mention of lodestar crosscheck); *Jones v. Alliance Imaging, Inc.*, No. RG05210418 (Super. Ct., Alameda County, Nov. 27, 2006) (33% fee award with no mention of lodestar crosscheck); *Wisniewski v. Pacific Maritime Assoc.*, No. BC293134 (Super. Ct., Los Angeles County, Nov. 20, 2006) (30.7% fee award from \$12.9 million settlement with no mention of lodestar crosscheck); *Garcia v. Save Mart Supermarkets*, No. 312026 (Super. Ct., Stanislaus County, Aug. 3, 2004) (33% fee award with no mention of lodestar crosscheck); *Terrell v. Ocean's 11 Casino, Inc.*, No. GIC795732 (Super. Ct., San Diego County, Feb. 10, 2004) (approving 33% fee award); *Big Lots Overtime Cases*, JCC Proceeding No. 4283, San Bernardino County Superior Court, Feb 4, 2004) (approving a 33% fee recovery); *Tokar v. GEICO*, (San Diego Superior Court, No. GIC 810166, July 9, 2004) (approving award of 33-1/3%); *Davis v. The Money Store, Inc.*, (San Diego County Superior Court, No. 99AS01716, December 26, 2000) (33-13% of the settlement).

40. Indeed, numerous courts have awarded attorneys' fees of up to, or in excess of 40% of the common fund. *Ammari Electronics, et al. v. Pacific Bell Directory*, Alameda County Sup. Ct., Case No. RG05198014 (awarded 43.8%) (2015); *In re California Indirect Purchaser X Ray Film Antitrust Litigation*, San Francisco Sup. Ct. 1998 (citing *Abzug v. Kerkorian*, Los Angeles Sup. Ct., Nov. 19, 1990, Case No. CA-00981 (45%) and *Haitz v. Meyer*, Alameda County Sup. Ct., August

20, 1990, Case No. 5729683 (45%)); *Hall v. Cinema 7, Inc.*, San Francisco Sup. Ct., July 16, 2008, Case No. CGC-01-409105 (53%); and *Rundberg v. Intrawest Napa Dev. Co.*, Napa County Sup. Ct., January 15, 2014, Case No. 26-56886 (40%).

41. Plaintiff has provided written approval of the split of attorneys' fees in this action: 48% to Haines Law Group, APC, 32% to Lidman Law, APC, and 20% to Law Offices of Fred L. Fong, APC. Law Offices of Fred L. Fong, APC is the referring attorney. Further, being a private law practice my firm can only properly litigate a limited number of cases at one time. The professional demands of this case were significant, including a significant number of hours of attorney and paralegal time. This litigation precluded my firm from other employment due to the time and financial commitments required by the case. Indeed, because my firm takes on cases on a purely contingency fee, we are only compensated for our time if we successfully settle a case or prevail at trial. Accordingly, I believe the requested fees are reasonable.

42. The requested service award to Plaintiff of \$5,000.00 is also reasonable given Plaintiff's efforts in this case and the risks she undertook on behalf of Settlement Class members. Plaintiff gathered documents for use in the lawsuit, and worked with Class Counsel on the case, including preparing for mediation and discussing the case, the merits, the defenses, and the overall fairness of the settlement reached. Thus, the service award to Plaintiff is appropriate and justified as part of the Settlement and should be finally approved.

43. Plaintiff served the proposed Settlement Agreement on the California Labor & Workforce Development Agency ("LWDA") on April 26, 2021, the same date that she filed the Motion for Preliminary Approval. True and correct copies of the proof of service and email confirmation received from the LWDA after Plaintiff submitted the proposed Settlement Agreement are attached hereto as **Exhibit E**. On August 18, 2021, Plaintiff submitted the proposed Amended Settlement Agreement on the LWDA. True and correct copies of the proof of service and email confirmation received from the LWDA after Plaintiff submitted the proposed Amended Settlement Agreement are attached hereto as **Exhibit F**. On October 15, 2021, Plaintiff served the Order granting preliminary approval on the LWDA. True and correct copies of the proof of service and email confirmation received

1 from the LWDA after Plaintiff submitted the Order granting preliminary approval are attached hereto  
2 as **Exhibit G**.

3 44. Plaintiff is submitting a copy of the Motion for Final Approval and all supporting  
4 documents via the LWDA's website on the same date that it is filing this motion and will file a  
5 supplemental proof of service after the Motion for Final Approval and all supporting documents are  
6 submitted to the LWDA.

7 45. As stated on the Notice of Pendency to Class Action and Proposed Settlement mailed to  
8 class members, the final judgment entered by the Court will be posted by the Settlement Administrator  
9 on the Settlement Administrator's website at <http://www.phoenixclassaction.com/judgments>.

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

12 Executed on January 21, 2022 at El Segundo, California.

13  
14   
15 Elizabeth Nguyen

# EXHIBIT A

to Declaration of Elizabeth Nguyen

EXHIBIT A

to Declaration of Elizabeth Nguyen

OCT 08 2021

Y. WILLIAMS

CA1

OCT 12 2021

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Attorneys for Plaintiff  
ROSALBA RAMIREZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF RIVERSIDE**

ROSALBA RAMIREZ, as an individual and on  
behalf of all others similarly situated,

Plaintiff,

vs.

MOLDED DEVICES, INC., a California  
corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. RIC2001161

*[Assigned to the Honorable Craig G. Riemer in  
Dept. 1]*

**~~[SECOND AMENDED PROPOSED]~~ ORDER  
GRANTING PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT**

*[filed concurrently with Supplemental  
Brief ISO of Motion for Preliminary  
Approval, Supplemental Declaration of  
Elizabeth Nguyen, and Supplemental  
Declaration of Jodey Lawrence]*

Date: September 13, 2021  
Time: 8:30 a.m.  
Dept.: 1

**Reservation ID.: 995653482449**

Complaint Filed: March 11, 2020  
Trial Date: None Set

1 The Motion of Plaintiff Rosalba Ramirez (“Plaintiff”) for Preliminary Approval of Class Action  
2 Settlement (“Motion”) came on regularly for hearing before this Court on September 13, 2021 at 8:30  
3 a.m. in Department 1 based upon the terms and conditions set forth in the Amended Stipulation of  
4 Settlement (the “Settlement”), a copy of which is attached as **Exhibit 2** to the Supplemental Declaration  
5 of Elizabeth Nguyen in Support of Plaintiff’s Supplemental Brief ISO Motion for Preliminary Approval  
6 of Class Action Settlement.

7 The Court fully reviewed the Motion for Preliminary Approval; Memorandum of Points and  
8 Authorities and Supplemental Briefing in support thereof; supporting declarations filed therewith; the  
9 Settlement and all exhibits thereto, including the following documents:

- 10 1. Notice of Pendency of Class Action and Proposed Settlement, a copy of which is  
11 attached hereto as **Exhibit A**;
- 12 2. Dispute Regarding Notice of Settlement Award, a copy of which is attached hereto as  
13 **Exhibit B**;
- 14 3. Request for Exclusion Form, a copy of which is attached hereto as **Exhibit C**; and  
15 4. The Objection Form, a copy of which is attached hereto as **Exhibit D**; and

16 As such, and good cause appearing, the Court HEREBY ORDERS THE FOLLOWING:

17 1. The Court GRANTS preliminary approval of the class action settlement as set forth in  
18 the Settlement and finds its terms to be within the range of reasonableness of a settlement that ultimately  
19 could be granted approval by the Court at a hearing on Plaintiff’s Motion for Final Approval of Class  
20 Action Settlement. For purposes of the Settlement, the Court finds that the proposed Settlement Class  
21 is ascertainable and that there is a sufficiently well-defined community of interest among the members  
22 of the Settlement Class in questions of law and fact. Therefore, for settlement purposes only, the Court  
23 grants conditional certification of the following Settlement Class:

24 All current and former hourly employees of Defendant Molded Devices who  
25 worked in California at some time between March 11, 2016 and February 13,  
26 2021.

27 2. For purposes of the Settlement, the Court designates named Plaintiff Rosalba Ramirez  
28 as Class Representative, and designates Scott M. Lidman, Elizabeth Nguyen, Milan Moore, and

1 Romina Tamiry of Lidman Law, APC and Paul K. Haines of Haines Law Group, APC as Class  
2 Counsel.

3 3. The Court designates Phoenix Settlement Administrators ("Phoenix") as the third-party  
4 Settlement Administrator for mailing notices.

5 4. The Court approves, as to form and content, the Notice of Pendency of Class Action  
6 and Proposed Settlement, Dispute Regarding Notice of Settlement Award, Request for Exclusion  
7 Form, and Objection Form.

8 5. The Court finds the mailing of the Notice of Pendency of Class Action and Proposed  
9 Settlement, Dispute Regarding Notice of Settlement Award, Request for Exclusion Form, and  
10 Objection Form constitutes the best notice practicable under the circumstances, and constitute valid,  
11 due, and sufficient notice to all members of the Settlement Class. The form and method of giving  
12 notice complies fully with the requirements of California Code of Civil Procedure section 382,  
13 California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the California and  
14 United States Constitutions, and other applicable law.

15 6. The Court further approves the procedures for Settlement Class members to opt out of  
16 or object to the Settlement, as set forth in the Notice of Pendency of Class Action and Proposed  
17 Settlement.

18 7. The procedures and requirements for filing objections in connection with the Hearing  
19 on Plaintiff's Motion for Final Approval of Class Action Settlement are intended to ensure the efficient  
20 administration of justice and the orderly presentation of any Settlement Class member's objection to  
21 the Settlement, in accordance with the due process rights of all Settlement Class members.

22 8. The Court directs the Settlement Administrator to mail the Notice Packet (which is  
23 comprised of the (i) the Notice of Pendency of Class Action and Proposed Settlement; (ii) Dispute  
24 Regarding Notice of Settlement Award; (iii) Request for Exclusion Form; and (iv)  
25 Objection Form) to all of the Class members in accordance with the terms of the Settlement. Any  
26 Dispute Regarding Notice of Settlement Award, Request for Exclusion or Objection shall be submitted  
27 directly to the Settlement Administrator and not filed with the Court. Upon receipt of any Dispute  
28

1 Regarding Notice of Settlement Award, Request for Exclusion or Objection, the Settlement  
2 Administrator shall forward copies of every Dispute Regarding Notice of Settlement Award, Request  
3 for Exclusion and Objection to counsel for all parties. The Settlement Administrator shall file a  
4 declaration concurrently with the filing of the Motion for Final Approval of Class Action Settlement  
5 with information about every Dispute Regarding Notice of Settlement Award, Request for Exclusion  
6 and Objection received by the Settlement Administrator. The Settlement Administrator shall give  
7 notice to any objecting Settlement Class member of any continuance of the hearing on Plaintiff's  
8 Motion for Final Approval of Class Action Settlement.

9 9. The Class Notice shall provide at least 60 calendar days' notice for Settlement Class  
10 members to opt out of, or object to, the Settlement.

11 10. The hearing on Plaintiff's Motion for Final Approval of Class Action Settlement on the  
12 question of whether the Settlement should be finally approved as fair, reasonable, and adequate is  
13 scheduled in Department 1 of this Court, located at 4050 Main Street, Riverside, California 92501 on  
14 February 15, 2022 at 8:30 a.m./~~p.m.~~

15 11. At the hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, the  
16 Court will consider: (a) whether the Settlement should be finally approved as fair, reasonable, and  
17 adequate for the Settlement Class; (b) whether a judgment granting final approval of the Settlement  
18 should be entered; and (c) whether Plaintiff's application for reasonable attorneys' fees, reimbursement  
19 of litigation expenses, service award to Plaintiff, and payment to the Labor and Workforce  
20 Development Agency ("LWDA") for penalties under the Labor Code Private Attorneys General Act  
21 ("PAGA") should be granted.

22 12. Counsel for the parties shall file memoranda, declarations, or other statements and  
23 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation  
24 expenses, Plaintiff's service award, settlement administration costs, and payment to the LWDA for  
25 PAGA penalties prior to the hearing on Plaintiff's Motion for Final Approval of Class Action  
26 Settlement according to the time limits set by the Code of Civil Procedure and the California Rules of  
27 Court.  
28

13. An implementation schedule is below:

| Event                                                                                               | Date                                                                                                 | Actual Date <sup>1</sup> |
|-----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|--------------------------|
| Defendants to provide Class Data to Settlement Administrator                                        | 30 calendar days after issuance of the preliminary approval order                                    | October 13, 2021         |
| Settlement Administrator to mail Notice Packets to Class Members                                    | 10 business days after receiving Class Information from Defendants                                   | October 27, 2021         |
| Deadline for Class Members to request exclusion from, submit disputes, or object to, the Settlement | 60 calendar days after mailing of the Notice by the Settlement Administrator                         | December 27, 2021        |
| Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:                | 16 Court days before the hearing on Plaintiff's Motion for Final Approval of Class Action Settlement |                          |
| Hearing on Plaintiff's Motion for Final Approval of Class Action Settlement:                        | <i>February 15, 2022</i><br><i>at 8:30 AM</i>                                                        |                          |

14. Pending the hearing on Plaintiff's Motion for Final Approval of Class Action Settlement, all proceedings in this action, other than proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this Order, are stayed.

15. Counsel for the parties are hereby authorized to utilize all reasonable procedures in connection with the administration of the Settlement which are not materially inconsistent with either this Order or the terms of the Settlement.

**IT IS SO ORDERED.**

Dated: *Sept 30*, 2021

  
Honorable Craig G. Riemer  
Judge of the Superior Court

<sup>1</sup> These dates are based on the Court granting preliminary approval at the hearing, currently noticed for September 13, 2021.

EXHIBIT A

EXHIBIT A

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

ROSALBA RAMIREZ, as an individual and on behalf  
of others similarly situated,

Plaintiff,

vs.

MOLDED DEVICES, INC., a California corporation;  
and Does 1 through 100,

Defendants.

Case No. RIC2001161

**NOTICE OF PENDENCY OF CLASS  
ACTION AND PROPOSED SETTLEMENT**

To: All current and former hourly employees who have worked for Defendant Molded Devices, Inc. ( "Defendant" or "Molded Devices") in California at some time between March 11, 2016 and February 13, 2021. Collectively, these employees will be referred to as "Settlement Class Members."

**PLEASE READ THIS NOTICE CAREFULLY  
YOUR LEGAL RIGHTS MAY BE AFFECTED WHETHER YOU ACT OR NOT**

***Why should you read this notice?***

The Court has granted preliminary approval of a proposed class action settlement (the "Settlement") in *Rosalba Ramirez v. Molded Devices, Inc.*, Riverside County Superior Court Case No. RIC2001161 (the "Lawsuit"). Because your rights may be affected by the Settlement, it is important that you read this notice carefully.

You may be entitled to money from this Settlement. Molded Devices' records show that you were employed at Molded Devices as an hourly employee in California at some time between March 11, 2016 and February 13, 2021 (the "Class Period"). The Court ordered that this Notice be sent to you because you may be entitled to money under the Settlement and because the Settlement affects your legal rights.

The purpose of this notice is to provide you with a brief description of the Lawsuit, to inform you of the terms of the Settlement, to describe your rights in connection with the Settlement, and to explain what steps you may take to object to or exclude yourself from the Settlement. If you do not exclude yourself from the Settlement and the Court finally approves the Settlement, you will be bound by the terms of the Settlement and any final judgment.

***What is this case about?***

Plaintiff Rosalba Ramirez ("Plaintiff") brought this Lawsuit against Molded Devices seeking to assert claims on behalf of a class of current and former hourly employees who worked for Molded Devices in California on or after March 11, 2016. Plaintiff Rosalba Ramirez is known as the "Class Representative," and her attorneys, who also represent the interests of all Settlement Class members, are known as "Class Counsel."

The Lawsuit alleges that Molded Devices failed to pay Settlement Class members all minimum wages, overtime wages, and all wages owed upon termination, and failed to provide to Settlement Class members all required meal and rest breaks. As a result of the foregoing alleged violations, Plaintiff also alleges that Defendant failed to maintain accurate payroll records, failed to provide accurate, itemized wage statements and also engaged in unfair business practices.

Molded Devices asserts that it has complied with California law at all times. Molded Devices denies that it has done anything wrong, and says that all hourly employees in the class were properly compensated for all hours worked, were provided with meal and rest breaks, did take meal and rest breaks as required by law,

were provided with accurate itemized wage statements, properly reimbursed for reasonable and necessary business expenses, and timely paid all wages at separation. Molded Devices denies that any unlawful policy or practice exists as to the above claims. Molded Devices further denies that it owes Settlement Class members any wages, restitution, penalties, or other damages. Accordingly, the Settlement constitutes a compromise of disputed claims and should not be construed as an admission of liability on the part of Molded Devices, which expressly denies all liability.

**The Court has not ruled on the merits of Plaintiff's claims.** However, to avoid additional expense, inconvenience, and interference with its business operations, Molded Devices has concluded that it is in its best interests and the interests of Settlement Class members to settle the Lawsuit on the terms summarized in this Notice. The Settlement was reached after mediation between the parties.

The Class Representative and Class Counsel support the Settlement after conducting an investigation of the facts and applicable law. Among the reasons for support are the defenses to liability potentially available to Molded Devices, the risk of not being able to proceed in the lawsuit on behalf of all current and former hourly employees of Molded Devices who worked in California at some time between March 11, 2016 and February 13, 2021, the inherent risks of trial on the merits, and the delays and uncertainties associated with litigation.

The Court has only determined that there is sufficient evidence to suggest that the proposed settlement might be fair, adequate, and reasonable and that any final determination of those issues will be made at the final hearing.

**If you are still employed by Molded Devices, your decision about whether to participate in the Settlement will not affect your employment. California law and Molded Devices' policies strictly prohibit unlawful retaliation.** Molded Devices will not take any adverse employment action against or otherwise target, retaliate, or discriminate against any Settlement Class member because of the Settlement Class Member's decision to either participate or not participate in the Settlement.

***Who are the Attorneys?***

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Attorneys for the Plaintiff / Settlement Class Members:</p> <p><b>LIDMAN LAW, APC</b><br/>Scott M. Lidman<br/><a href="mailto:slidman@lidmanlaw.com">slidman@lidmanlaw.com</a><br/>Elizabeth Nguyen<br/><a href="mailto:enguyen@lidmanlaw.com">enguyen@lidmanlaw.com</a><br/>Milan Moore<br/><a href="mailto:mmoore@lidmanlaw.com">mmoore@lidmanlaw.com</a><br/>Romina Tamiry<br/><a href="mailto:rtamiry@lidmanlaw.com">rtamiry@lidmanlaw.com</a><br/>2155 Campus Drive, Suite 150<br/>El Segundo, California 90245<br/>Tel: (424) 322-4772<br/>Fax: (424) 322-4775<br/><a href="http://www.lidmanlaw.com">www.lidmanlaw.com</a></p> <p><b>HAINES LAW GROUP, APC</b><br/>Paul K. Haines<br/><a href="mailto:phaines@haineslawgroup.com">phaines@haineslawgroup.com</a><br/>2155 Campus Drive, Suite 180<br/>El Segundo, California 90245<br/>Tel: (424) 292-2350<br/>Fax: (424) 292-2355</p> | <p>Attorneys for Defendant Molded Devices, Inc.</p> <p><b>HILL, FARRER &amp; BURRILL LLP</b><br/>James A. Bowles<br/><a href="mailto:jbowles@hfbllp.com">jbowles@hfbllp.com</a><br/>Elissa L. Gysi<br/><a href="mailto:egysi@hfbllp.com">egysi@hfbllp.com</a><br/>300 So. Grand Ave., 37<sup>th</sup> Floor<br/>Los Angeles, California 90071<br/>Tel: (213) 621-0817<br/>Fax: (213) 624-9441<br/><a href="http://www.hillfarrer.com">www.hillfarrer.com</a></p> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

***What are the terms of the Settlement?***

On <<PRELIM APPROVAL DATE>>, the Court preliminarily certified a class, for settlement purposes only, of all current and former hourly employees who worked for Molded Devices in California at any time from March 11, 2016 through February 12, 2021. Settlement Class members who do not opt out of the Settlement pursuant to the procedures set forth in this Notice will be bound by the Settlement and will release their claims against Molded Devices as described below.

Molded Devices has agreed to pay \$350,000.00 (the "Gross Settlement Amount") to fully resolve all claims in the Lawsuit, including payments to Settlement Class members, attorneys' fees and expenses, payment to the Labor Workforce Development Agency ("LWDA"), settlement administration costs, and the Class Representative's Service Award. Molded Devices' share of payroll taxes associated with any wage payments to Settlement Class members shall be paid by Molded Devices separately from, and in addition to, the Gross Settlement Amount.

The following deductions from the Gross Settlement Amount will be requested by the parties:

Settlement Administration Costs. The Court has approved Phoenix Settlement Administrators to act as the "Settlement Administrator," who is sending this Notice to you and will perform many other duties relating to the Settlement. The Court has approved setting aside a flat fee in the amount of \$3,995.00 from the Gross Settlement Amount to pay the Settlement administration costs.

Attorneys' Fees and Expenses. Class Counsel have been prosecuting the Lawsuit on behalf of the Settlement Class Members on a contingency fee basis (that is, without being paid any money to date) and have been paying all litigation costs and expenses. The Court will determine the actual amount awarded to Class Counsel as attorneys' fees, which will be paid from the Gross Settlement Amount. Settlement Class members are not personally responsible for any of Class Counsel's attorneys' fees or expenses. Class Counsel will ask for fees of up to one-third of the Gross Settlement Amount, which is estimated to be \$116,666.66, as reasonable compensation for the work Class Counsel performed and will continue to perform in this Lawsuit through Settlement finalization. Class Counsel also will ask for reimbursement in an amount that shall not exceed \$30,000.00 for verified costs Class Counsel incurred in connection with the Lawsuit.

Service Award to Class Representative. Class Counsel will ask the Court to award the Class Representative a service award in the amount of \$5,000.00, to compensate her for her service and extra work provided on behalf of the Settlement Class members.

LWDA Payment. Class Counsel will ask the Court to approve a payment in the total amount of \$30,000.00 as and for alleged civil penalties, payable pursuant to the California Labor Code Private Attorney General Act ("PAGA"). Per Labor Code section 2699(i), seventy-five percent (75%) of such penalties, or Twenty-Two Thousand Five Hundred Dollars and Zero Cents (\$22,500.00) will be payable to the LWDA, and the remaining twenty-five percent (25%), or Seven Thousand Five Hundred Dollars and Zero Cents (\$7,500.00), will be payable to certain Settlement Class members as the "PAGA Amount," as described below.

Calculation of Individual Settlement Class Members' Settlement Award. After deducting the Court-approved amounts above, the balance of the Gross Settlement Amount will form the Net Settlement Amount ("NSA"), which will be distributed to all Settlement Class members who do not submit a valid and timely Request for Exclusion (described below). The NSA is estimated at approximately \$171,838.34, to be shared among up to an estimated ■ Settlement Class members. The NSA will be divided as follows:

Each participating Settlement Class Member shall receive a proportionate settlement share based upon the number of workweeks worked during the Class Period, the numerator of which is the

Settlement Class Member's total workweeks worked during the Class Period, and the denominator of which is the total workweeks worked by all Settlement Class Members who worked during the Class Period.

In addition, the PAGA Amount will be allocated as follows. Each Settlement Class Member who was employed by Molded Devices at some time between March 11, 2019 and February 13, 2021, shall receive a portion of the PAGA Amount proportionate to the number of workweeks that he or she worked during the period between March 11, 2019 and February 13, 2021, and which will be calculated by multiplying the PAGA Amount by a fraction, the numerator of which is the Settlement Class Member's number of workweeks worked during this time period, and the denominator of which is the total number of workweeks worked by all Settlement Class Members during this time period.

The estimate of the likely Individual Settlement Payment to the average Settlement Class Member is \$ \_\_\_\_\_, and the estimate of the range of possible Individual Settlement Payments is from approximately \$ \_\_\_\_\_ to \$ \_\_\_\_\_.

Payments to Settlement Class Members. If the Court grants final approval of the Settlement, Settlement Awards will be mailed to all Settlement Class members who did not submit a completed, valid and timely Request for Exclusion form (described in more detail below). In addition, if the Court grants final approval of the Settlement, each Settlement Class members' share of the PAGA Amount will be mailed to all Settlement Class members who were employed by Molded Devices at some time between March 11, 2019 and February 13, 2021.

Payment by Molded Devices of Gross Settlement Amount. The Gross Settlement Amount shall be paid by Molded Devices within thirty (30) calendar days after the "Effective Date" which is defined as the latter of: (a) the Court's final approval of the settlement if no objections by or on behalf of Settlement Class Members have been filed; (b) the time for appeal has expired if an objection has been filed and no appeal has been filed or withdrawn; or (c) the final resolution of any appeal that has been filed.

Within ten (10) calendar days following Molded Devices' deposit of the Gross Settlement Amount with the Settlement Administrator, the Settlement Administrator will calculate Settlement Award amounts and provide the same to counsel for the Parties for review and approval. Within seven (7) calendar days of approval by counsel for the Parties, the Settlement Administrator will prepare and mail Settlement Awards, less applicable taxes and withholdings, to participating Settlement Class members.

Allocation and Taxes. For tax purposes, each Settlement Award shall be allocated as follows: Sixty Seven Percent (67%) as penalties and interest; and Thirty Three Percent (33%) as wages. The Settlement Administrator will be responsible for issuing to participating Settlement Class members IRS Forms 1099 for the amounts allocated as penalties and interest and IRS Forms W-2 for amounts deemed "wages." Settlement Class members are responsible for the proper income tax treatment of the Settlement award. The Settlement Administrator, Molded Devices and its counsel, and Class Counsel cannot provide tax advice. Accordingly, Settlement Class members should consult with their tax advisors concerning the tax consequences and treatment of payments they receive under the Settlement.

Release. If the Court approves the Settlement, the Settlement Class, and each Settlement Class member who has not submitted a timely and valid Request for Exclusion, will release Molded Devices and all of their past and present officers, directors, employees, and agents (collectively the "Released Parties"), from all wage and hour claims for any and all violations of California's Labor Code and Unfair Competition Law based on the factual allegations alleged in the operative complaint with respect the following claims: Defendant's failure to pay for all hours worked (including minimum wages, hourly rate wages, and overtime wages), failure to provide meal periods, failure to authorize and permit rest periods, failure to timely pay all wages due at the time of termination, failure to maintain accurate payroll records, failure to furnish accurate, itemized wage statements, failure to timely pay wages during employment, civil penalties under California's Private Attorneys General Act of 2004 ("PAGA") based on the alleged Labor Code violations, and all damages, interest, penalties, attorneys' fees, costs, and other amounts recoverable under said causes of action under California law, to the extent permissible, including but not limited to the California Labor Code and

the applicable Wage Orders (collectively, the “Released Claims”). The time period of the Settlement Class Members’ Release shall be the same time period as the Class Period.

Release of PAGA. Plaintiff and all Settlement Class Members who were employed by Molded Devices in California at some time between March 11, 2019 and February 13, 2021, will not have the opportunity to opt out or object to the PAGA Amount or opt-out of the release of the PAGA claim, although the release of PAGA claim will be subject to Court approval.

The releases identified herein shall be null and void should the Settlement not be fully funded.

Conditions of Settlement. The Settlement is conditioned upon the Court entering an order at or following the Final Approval Hearing finally approving the Settlement as fair, reasonable, adequate, and in the best interests of the Settlement Class, and the entry of Judgment.

#### ***How can I claim money from the Settlement?***

Do Nothing. If you do nothing, you will be entitled to your share of the Settlement based on the proportionate number of workweeks you worked during the Class Period (as explained above) stated in the accompanying Dispute Regarding Notice of Settlement Award. You also will be bound by the Settlement, including the release of claims stated above.

#### ***What other options do I have?***

Dispute Regarding Notice of Settlement Award. Your award is based on the proportionate number of workweeks you worked during the Class Period, the number of workweeks worked at some time between March 11, 2016 and February 13, 2021. The information contained in Molded Devices’ records regarding all of these factors, along with your estimated settlement award, is listed on the accompanying Dispute Regarding Notice of Settlement Award. If you disagree with the information in your Dispute Regarding Notice of Settlement Award, you may submit a dispute, along with any supporting documentation, in accordance with the procedures stated in the Dispute Regarding Notice of Settlement Award. Any disputes, along with supporting documentation, must be postmarked no later than <<RESPONSE DEADLINE>>. **DO NOT SEND ORIGINALS; DOCUMENTATION SENT TO THE SETTLEMENT ADMINISTRATOR WILL NOT BE RETURNED OR PRESERVED.**

The Parties and the Settlement Administrator will evaluate the evidence submitted and discuss in good faith how to resolve any disputes submitted by Settlement Class members. The Settlement Administrator’s decision regarding any dispute will be final.

Exclude Yourself from the Settlement. If you **do not** wish to take part in the Settlement, you may exclude yourself by completing the enclosed “Request for Exclusion” form and sending the completed “Request for Exclusion” form to the Settlement Administrator at <<INSERT ADMINISTRATOR CONTACT INFO>> postmarked no later than <<RESPONSE DEADLINE>>. To be valid, the Request for Exclusion **must** be completely filled out and signed. However, you cannot exclude yourself from the PAGA Amount discussed herein.

Any person who mails a timely and valid Request for Exclusion form shall, upon receipt by the Settlement Administrator, no longer be a Settlement Class member, shall be barred from participating in any portion of the Settlement, and shall receive no benefits from the Settlement (aside from a portion of the PAGA Amount if the person was employed by Molded Devices at some time between March 11, 2019 and February 13, 2021). **Do not submit both a Dispute Regarding Notice of Settlement Award and a Request for Exclusion.** If you do, the Request for Exclusion will be invalid, you will be included in the Settlement Class, and you will be bound by the terms of the Settlement.

Objecting to the Settlement. You also have the right to object to the terms of the Settlement. However, if the Court rejects your objection, you will still be bound by the terms of the Settlement. If you wish to object to the Settlement, or any portion of it, you may complete the enclosed “Objection” form and mail it to the

Settlement Administrator. To be valid, the Objection form **must** be completely filled out and signed. Written objections must be postmarked on or before <<RESPONSE DEADLINE>>.

If you choose to object to the Settlement, you may also appear at the Final Approval Hearing scheduled for <<FINAL APPROVAL HEARING DATE/TIME>> in Department 1 of the Riverside County Superior Court, located at 4050 Main Street Riverside, CA 92501. You have the right to appear either in person or through your own attorney at this hearing. All objections or other correspondence must state the name and number of the case, which is *Rosalba Ramirez v. Molded Devices, Inc.*, Riverside County Superior Court Case No RIC2001161.

Any Class Member who elects to appear personally at the Court for any reason related to this Action must comply with the Court's social distancing and mandatory face covering requirements, as well and other orders related to COVID-19. All such rules and orders can be located at the Court's website: [www.riversidecourts.ca.gov](http://www.riversidecourts.ca.gov).

If you object to the Settlement, you will remain a member of the Settlement Class, and if the Court approves the Settlement, you will be bound by the terms of the Settlement in the same way as Settlement Class members who do not object.

#### ***What is the next step?***

The Court will hold a Final Approval Hearing on the adequacy, reasonableness, and fairness of the Settlement on <<FINAL APPROVAL HEARING DATE/TIME>>, in Department 1 of the Riverside County Superior Court, located at 4050 Main Street Riverside, CA 92501. The Court will also be asked to rule on Class Counsel's request for attorneys' fees and reimbursement of documented costs and expenses and the Enhancement Award to the Class Representative. The Final Approval Hearing may be postponed without further notice to Settlement Class members, except the Settlement Administrator will provide notice to any Settlement Class members who have submitted a timely objection. **You have the right to attend the Final Approval Hearing but are not required to do so. If you attend the hearing and/or retain your own separate attorney, it will be at your own expense.**

Any Settlement Class member who elects to appear personally at the Court for any reason related to this Action must comply with the Court's social distancing and mandatory face covering requirements, as well and other orders related to COVID-19. All such rules and orders can be located at the Court's website: [www.riversidecourts.ca.gov](http://www.riversidecourts.ca.gov).

The Court's final judgment will be posted on the Settlement Administrator's website ([http://www.\\_\\_\\_\\_\\_.com](http://www._____.com)).

#### ***How can I get additional information?***

This Notice is only a summary of the Lawsuit and the Settlement. For more information, you may inspect the Court's files and the Settlement Agreement at the Office of the Clerk of the Riverside County Superior Court, located at 4050 Main Street Riverside, CA 92501, during regular court hours. You may also contact Class Counsel using the contact information listed above for more information or contact the Settlement Administrator.

You may also access the Court's electronic case file with the following steps; Go to <https://www.riverside.courts.ca.gov/>; (ii) Click on the "Online Services" tab; (iii) Click on the "Search Court Records" option; (iv) in the "Civil, Family Law & Probate Records"; (v) click on "Case Number Search" ; (vi) log onto your account or create an account if you do not have one; (viii) in the Case Number box enter "RIC2001161" and click "Search"; and (v) the name of the case should be appear "Ramirez vs. Molded Devices", click on the Case Number which appears to the right of the Case Name, you can view the schedule of upcoming hearings and other information about the case.

You may also obtain a copy of the Settlement by requesting a copy from the Settlement Administrator or by accessing the Court's electronic file as explained above, locate the entry for the "Supplemental Declaration of Elizabeth Nguyen in Support of Plaintiff's Supplemental Brief ISO Motion for Preliminary Approval of Class Action Settlement" filed on \_\_\_\_\_ 2021, click on the document icon (it appears as a small camera) associated with that entry, and follow any additional prompts provided. The Settlement will be attached as Exhibit 2 to Ms. Nguyen's Declaration.

**PLEASE DO NOT CALL OR WRITE THE COURT FOR INFORMATION ABOUT THIS SETTLEMENT  
OR THE SETTLEMENT PROCESS**

**REMINDER AS TO TIME LIMITS**

The deadline for submitting any Dispute Regarding Notice of Settlement Award, Request for Exclusion, or Objection is <<**RESPONSE DEADLINE**>>. These deadlines will be strictly enforced.

**BY ORDER OF THE COURT ENTERED ON <<PRELIM APPROVAL DATE>>.**

**EXHIBIT B**

**EXHIBIT B**

## **DISPUTE REGARDING NOTICE OF SETTLEMENT AWARD**

*ROSALBA RAMIREZ V. MOLDED DEVICES, INC.*  
RIVERSIDE COUNTY SUPERIOR COURT CASE NO. RIC2001161

Please complete, sign, date and return this Form to <<ADMINISTRATOR CONTACT INFO>> **ONLY IF** (1) your personal contact information has changed, and/or (2) you wish to dispute any of the items listed in Section (III), below. It is your responsibility to keep a current address on file with the Settlement Administrator.

**(I) Please type or print your name:**

\_\_\_\_\_  
(First, Middle, Last)

**(II) Please type or print the following identifying information if your contact information has changed:**

\_\_\_\_\_  
Former Names (if any)

\_\_\_\_\_  
New Street Address

\_\_\_\_\_  
City

\_\_\_\_\_  
State

\_\_\_\_\_  
Zip Code

**(III) Information Used to Calculate Your Individual Settlement Payment:**

According to the records of Molded Devices, Inc. ("Molded Devices"):

- (a) you worked for Molded Devices for [ ] workweeks between March 11, 2016 and February 13, 2021; and
- (b) you worked for Molded Devices for [ ] workweeks between March 11, 2019 and February 13, 2021.

**Based on the above, your Individual Settlement Payment is estimated to be \$ [ ].**

**(IV) If you disagree with items (a)-(b) in Section (III) above, please explain why in the space provided below and include copies of any supporting evidence or documentation with this form:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If you dispute the above information from Molded Devices' records, Molded Devices' records will control unless you are able to provide documentation that establishes that Molded Devices' records are mistaken. If there is a dispute about whether Molded Devices' information or yours is accurate, and the dispute cannot be resolved informally, the dispute will be resolved by the Parties and the Settlement Administrator as described in the "Notice of Pendency of Class Action and Proposed Settlement" that accompanies this Form. The Settlement Administrator's decision regarding any dispute will be final.

**ANY DISPUTES, ALONG WITH ANY SUPPORTING DOCUMENTATION, MUST BE POSTMARKED  
NO LATER THAN <<RESPONSE DEADLINE>>.**

EXHIBIT C

EXHIBIT C

**REQUEST FOR EXCLUSION FORM**

*ROSALBA RAMIREZ V. MOLDED DEVICES, INC.*  
RIVERSIDE COUNTY SUPERIOR COURT CASE NO. RIC2001161

**SUBMIT THIS FORM ONLY IF YOU WISH TO BE EXCLUDED FROM PARTICIPATING IN THE  
CLASS ACTION SETTLEMENT**

By signing and returning this form, I represent that it is my desire to exclude myself from participating in the Settlement of the Class Action entitled ***Rosalba Ramirez v. Molded Devices, Inc.***, Riverside County Superior Court Case No. RIC2001161, and that I received notice of the Settlement, and that I do not want to participate and do not want to receive money from the Settlement.

**Please note: Any person who submits this form will not receive a settlement payment, aside from a portion of the PAGA Amount if the person was employed by Molded Devices, Inc. between March 11, 2019 and February 13, 2021.**

Name (Please Print): \_\_\_\_\_  
(First) (Middle) (Last)

Address: \_\_\_\_\_  
(Street)

\_\_\_\_\_  
(City) (State) (Zip)

Telephone No.: \_\_\_\_\_

Dated: \_\_\_\_\_ Signature: \_\_\_\_\_

**TO BE VALID, THIS FORM MUST BE POST-MARKED NO LATER THAN \_\_\_\_\_,  
AND MAILED TO THE CLAIMS SETTLEMENT ADMINISTRATOR AT:**

*Rosalba Ramirez v. Molded Devices, Inc.*  
Settlement Administrator  
c/o \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**EXHIBIT D**

**EXHIBIT D**

## OBJECTION FORM

ROSALBA RAMIREZ V. MOLDED DEVICES, INC.  
RIVERSIDE COUNTY SUPERIOR COURT CASE NO. RIC2001161

**COMPLETE THIS FORM ONLY IF YOU WISH TO OBJECT TO THE  
CLASS ACTION SETTLEMENT**

**In order for you to object to the Class Action Settlement entitled *Rosalba Ramirez v. Molded Devices, Inc.*, Riverside County Superior Court Case No. RIC2001161 you must complete all steps listed in 1-4 below.**

**You are not required to appear in Court in order to object to the Settlement but may appear if you wish to do so.**

1. Provide the following information:

Your Name (Please Print): \_\_\_\_\_  
(First) (Middle) (Last)

Your Address: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

2. Describe your objection to the Settlement (please attach additional documents if you need more space):

---

3. Date and sign this form below:

Dated: \_\_\_\_\_ Signature: \_\_\_\_\_

4. MAIL A COPY OF THIS COMPLETED FORM TO THE SETTLEMENT ADMINISTRATOR AT THE ADDRESS BELOW SO THAT IT IS POST-MARKED NO LATER THAN \_\_\_\_\_.

*Rosalba Ramirez v. Molded Devices, Inc.*  
Settlement Administrator  
c/o

**PROOF OF SERVICE**

STATE OF CALIFORNIA )  
 ) ss.  
COUNTY OF LOS ANGELES )

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 2155 Campus Drive, Suite 150, El Segundo, California 90245.

On September 13, 2021, I served the document(s) described as: **[SECOND AMENDED PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** on the interested party(ies) in this action as follows:

**HILL, FARRER & BURRILL LLP**

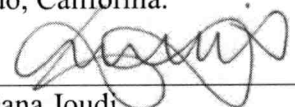
James A. Bowles (Bar No. 089383)  
jbowles@hfbllp.com  
Elissa L. Gysi (Bar No. 281338)  
egysi@hfbllp.com  
One California Plaza, 37th Floor  
300 South Grand Avenue  
Los Angeles, CA 90071-3147  
Telephone: (213) 620-0460  
Fax: (213) 624-4840

Attorneys for Defendant  
MOLDED DEVICES, INC.

☒ (BY MAIL) I am "readily familiar" with Lidman Law, APC's practice of collection and processing correspondence for mailing. I enclosed the document(s) in a sealed envelope or package addressed to the persons at the address(es) listed above. Under the practice the correspondence would be deposited with the U.S. postal service on the same day with postage thereof fully prepaid at El Segundo, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage date is more than one day after date of deposit for mailing in affidavit.

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

Executed on September 13, 2021, at El Segundo, California.

  
Dana Joudi

# EXHIBIT B

to Declaration of Elizabeth Nguyen

# EXHIBIT B

to Declaration of Elizabeth Nguyen

## Haines Law Group, APC

### Expense Summary

*Rosalba Ramirez v. Molded Devices, Inc.*

| EXPENSE                                                                                                                                                                                  | AMOUNT             |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| Mediation Costs (Plaintiff's portion of the mediator's fees)                                                                                                                             | \$8,000.00         |
| Expert Expenses for Analysis in Advance of Mediation                                                                                                                                     | \$7,936.00         |
| Filing Fees                                                                                                                                                                              | \$1,690.00         |
| Attorney Service Fees                                                                                                                                                                    | \$120.39           |
| Document Purchase Fees                                                                                                                                                                   | \$53.00            |
| Copying                                                                                                                                                                                  | \$151.50           |
| Postage                                                                                                                                                                                  | \$190.60           |
| LWDA submission fees                                                                                                                                                                     | \$75.00            |
| Anticipated costs for filing fees, service fees, expenses for future court appearances, and/or postage                                                                                   | \$200.00           |
| <b>TOTAL:</b>                                                                                                                                                                            | <b>\$18,416.49</b> |
| Per CMO § I.4.d., the above amount expressly excludes the <b>\$70.43</b> costs incurred in connection with Plaintiff's supplemental brief in support of motion for preliminary approval. |                    |

# EXHIBIT C

to Declaration of Elizabeth Nguyen

EXHIBIT C

to Declaration of Elizabeth Nguyen

# LIDMAN LAW

2155 CAMPUS DRIVE, SUITE 150, EL SEGUNDO, CA 90245

OFFICE: (424) 322-4772

FAX: (424) 322-4775

January 21, 2022

Rosalba Ramirez

## Professional Services

|            |     |                                                                                                                                                                                           | <u>Hrs/Rate</u>   | <u>Amount</u> |
|------------|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 11/21/2019 | MLM | Prepare for telephone intake with potential client including research employer, Molded Devices.                                                                                           | 0.90<br>400.00/hr | 360.00        |
| 11/22/2019 | MLM | Email with S. Lidman re [REDACTED]                                                                                                                                                        | 1.20<br>400.00/hr | 480.00        |
|            | MLM | Conduct telephone intake with R. Ramirez [REDACTED]                                                                                                                                       | 1.50<br>400.00/hr | 600.00        |
|            | SML | Confer with M. Moore re [REDACTED]                                                                                                                                                        | 1.20<br>750.00/hr | 900.00        |
| 12/20/2019 | MLM | Phone call to client re [REDACTED]                                                                                                                                                        | 0.70<br>400.00/hr | 280.00        |
| 3/4/2020   | MLM | Conduct fact research before drafting complaint.                                                                                                                                          | 1.00<br>400.00/hr | 400.00        |
|            | MLM | Draft complaint for wage and hour class action including claims for unpaid minimum and overtime wages, meal and rest period issues, wage statement violations and waiting time penalties. | 3.50<br>400.00/hr | 1,400.00      |
| 3/5/2020   | MLM | Confer with S. Lidman re [REDACTED]                                                                                                                                                       | 0.40<br>400.00/hr | 160.00        |
|            | MLM | Further revise draft complaint including revisions to sub class definitions and email to S. Lidman re same.                                                                               | 0.80<br>400.00/hr | 320.00        |
|            | ECN | Confer with S. Lidman and P. Haines re [REDACTED]                                                                                                                                         | 0.50<br>650.00/hr | 325.00        |

1/21/2022

|           |     |                                                                                                                                                | <u>Hrs/Rate</u>   | <u>Amount</u> |
|-----------|-----|------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 3/5/2020  | SML | Confer with M. Moore re [REDACTED]<br>[REDACTED]                                                                                               | 0.40<br>750.00/hr | 300.00        |
|           | SML | Confer with E. Nguyen and P. Haines re: [REDACTED]<br>[REDACTED]                                                                               | 0.50<br>750.00/hr | 375.00        |
|           | SML | Receive draft complaint from M. Moore and review of the same.                                                                                  | 1.10<br>750.00/hr | 825.00        |
| 3/6/2020  | MLM | Finalize draft complaint and send to D. Joudi for filing.                                                                                      | 0.40<br>400.00/hr | 160.00        |
|           | MLM | Draft LWDA letter to add a claim for civil penalties under the PAGA and send to D. Joudi re same.                                              | 1.60<br>400.00/hr | 640.00        |
|           | DJ  | Correspondence from M. Moore re: filing complaint.                                                                                             | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Correspondence from M. Moore re: submitting LWDA letter.                                                                                       | 0.10<br>175.00/hr | 17.50         |
| 3/11/2020 | DJ  | Finalize complaint and initial pleadings for filing; submit for filing. Finalize LWDA letter and submit; update client file re: same.          | 0.70<br>175.00/hr | 122.50        |
| 3/13/2020 | DJ  | Receive and process conformed copies of complaint and other pleadings; update client file re: same.                                            | 0.20<br>175.00/hr | 35.00         |
| 3/23/2020 | MLM | Receive and review notice of assignment to department 6.                                                                                       | 0.10<br>400.00/hr | 40.00         |
|           | DJ  | Process Notice of Assignment and update client file re: same.                                                                                  | 0.20<br>175.00/hr | 35.00         |
| 4/24/2020 | DJ  | Forward complaint and other pleadings to attorney service with instructions for service of process; correspond with attorney service re: same. | 0.20<br>175.00/hr | 35.00         |
| 4/27/2020 | DJ  | Correspondence from attorney service re: status of service of process                                                                          | 0.10<br>175.00/hr | 17.50         |
| 4/30/2020 | DJ  | Correspondence from and to E. Nguyen re: status of service of process and preparation of Case Management Conference Statement.                 | 0.10<br>175.00/hr | 17.50         |
| 5/4/2020  | DJ  | Correspondence to and from attorney service re: status of service of process and details of service.                                           | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Receive and process Proof of Service of Summons and Complaint; update client file re: same.                                                    | 0.10<br>175.00/hr | 17.50         |

1/21/2022

|           |     |                                                                                                                                     | <u>Hrs/Rate</u>   | <u>Amount</u> |
|-----------|-----|-------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 5/4/2020  | DJ  | Prepare Case Management Conference Statement; correspond with E. Nguyen re: same and filing Proof of Service of Summons with Court. | 0.70<br>175.00/hr | 122.50        |
| 5/6/2020  | MLM | Receive and review minute order continuing status conference from 5/11/2020 to 9/1/2020.                                            | 0.10<br>400.00/hr | 40.00         |
| 5/15/2020 | MLM | Review and revise draft First Amended Complaint adding a PAGA claim.                                                                | 0.60<br>400.00/hr | 240.00        |
|           | DJ  | Draft First Amended Complaint; correspondence with E. Nguyen, S. Lidman, and M. Moore re: same.                                     | 1.20<br>175.00/hr | 210.00        |
|           | SML | Review and revise draft First Amended Complaint adding a PAGA claim.                                                                | 0.30<br>750.00/hr | 225.00        |
| 5/22/2020 | MLM | Receive and review correspondence between E. Gysi, defense counsel and E. Nguyen re: 15-day extension to respond to complaint.      | 0.30<br>400.00/hr | 120.00        |
|           | DJ  | Correspondence from and to E. Nguyen re: service of Complaint and service of First Amended Complaint.                               | 0.20<br>175.00/hr | 35.00         |
|           | ECN | Receive and review email from defense counsel and exchange emails with same re first amended complaint and responsive pleading.     | 0.20<br>650.00/hr | 130.00        |
|           | SML | Receive and review correspondence between E. Gysi, defense counsel and E. Nguyen re: 15-day extension to respond to complaint.      | 0.10<br>750.00/hr | 75.00         |
| 6/16/2020 | MLM | Receive and review Defendant's peremptory challenge.                                                                                | 0.30<br>400.00/hr | 120.00        |
|           | DJ  | Correspondence from S. Lidman re: Defendant's Answer to FAC and Peremptory Challenge; update client file re: same.                  | 0.10<br>175.00/hr | 17.50         |
|           | ECN | Receive and review Defendant's answer and preemptory challenge.                                                                     | 0.20<br>650.00/hr | 130.00        |
|           | SML | Receive and review Defendant's peremptory challenge.                                                                                | 0.20<br>750.00/hr | 150.00        |
|           | SML | Confer with P. Haines re [REDACTED]                                                                                                 | 0.40<br>750.00/hr | 300.00        |
| 6/23/2020 | ECN | Confer with S. Lidman and P. Haines re [REDACTED]                                                                                   | 0.20<br>650.00/hr | 130.00        |
|           | SML | Receive and review notice of re-assignment to Department 1.                                                                         | 0.10<br>750.00/hr | 75.00         |
|           | SML | Confer with P. Haines and E. Nguyen re [REDACTED]                                                                                   | 0.20<br>750.00/hr | 150.00        |

1/21/2022

|           |     |                                                                                                                                                            | <u>Hrs/Rate</u>   | <u>Amount</u> |
|-----------|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 8/7/2020  | MLM | Review and revise Plaintiff's First Set of Written Discovery to include interrogatories for Defendant's policies and procedures for meal and rest periods. | 1.50<br>400.00/hr | 600.00        |
|           | DJ  | Draft initial set of written discovery; email to E. Nguyen, S. Lidman, and M. Moore re: same.                                                              | 2.30<br>175.00/hr | 402.50        |
| 8/10/2020 | DJ  | Receive edits from M. Moore on initial set of written discovery; revise documents per same.                                                                | 0.30<br>175.00/hr | 52.50         |
|           | DJ  | Finalize initial set of written discovery for service; serve same by mail; update client file re: same.                                                    | 0.70<br>175.00/hr | 122.50        |
| 8/17/2020 | MLM | Correspondence with D. Joudi re: reassignment to Judge Reimer and the operative Case Management Order.                                                     | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Receive and review email correspondence from E. Nguyen to E. Gysi, defense counsel, re: scheduling a telephonic meet and confer.                           | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Correspondence with E. Nguyen re: telephonic conference with defense counsel to discuss the joint report.                                                  | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Draft joint report in advance of Case Management Conference.                                                                                               | 1.60<br>400.00/hr | 640.00        |
|           | DJ  | Contact department clerk re: Case Management Order; email to M. Moore re: same.                                                                            | 0.20<br>175.00/hr | 35.00         |
|           | DJ  | Correspondence from and to M. Moore re: Court's Case Management Order; research re: same.                                                                  | 0.50<br>175.00/hr | 87.50         |
|           | ECN | Communicate with defense counsel re joint statement.                                                                                                       | 0.20<br>650.00/hr | 130.00        |
|           | ECN | Confer with S. Lidman and P. Haines re [REDACTED]                                                                                                          | 0.40<br>650.00/hr | 260.00        |
|           | SML | Confer with P. Haines and E. Nguyen re [REDACTED]                                                                                                          | 0.40<br>750.00/hr | 300.00        |
| 8/18/2020 | MLM | Review email correspondence between E. Nguyen and E. Gysi, defense counsel, re: telephonic meet and confer to discuss CMO topics.                          | 0.20<br>400.00/hr | 80.00         |
|           | ECN | Exchange emails with E. Gysi re meet and confer                                                                                                            | 0.20<br>650.00/hr | 130.00        |
| 8/19/2020 | MLM | Correspondence with D. Joudi re: issuance of Case Management Order.                                                                                        | 0.10<br>400.00/hr | 40.00         |

1/21/2022

|           |     |                                                                                                                                             | <u>Hrs/Rate</u>   | <u>Amount</u> |
|-----------|-----|---------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 8/19/2020 | DJ  | Correspondence from and to M. Moore re: issuance of Case Management Order.                                                                  | 0.30<br>175.00/hr | 52.50         |
| 8/20/2020 | MLM | Correspondence with D. Joudi and E. Nguyen re: Jeffrey Krivis' mediation dates of availability.                                             | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Correspondence to D. Joudi re: Plaintiff's withdrawal of written discovery served on 8/10/2020.                                             | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Email to E. Gysi, defense counsel, with the draft joint report in advance of telephonic meet and confer.                                    | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Telephonic meet and confer with E. Nguyen and E. Gysi, defense counsel, re: joint report.                                                   | 0.40<br>400.00/hr | 160.00        |
|           | MLM | Draft informal data/information requests in advance of mediation and email to E. Nguyen re: same.                                           | 0.90<br>400.00/hr | 360.00        |
|           | DJ  | Correspondence from M. Moore re: mediation.                                                                                                 | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Correspondence from M. Moore re: Plaintiff's withdrawal of written discovery served on 8/10/2020.                                           | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Correspondence from and to M. Moore and E. Nguyen re: issuance of Case Management Order; research re: same.                                 | 0.20<br>175.00/hr | 35.00         |
|           | DJ  | Factual research re: mediator availability; correspondence to and from M. Moore and E. Nguyen re: same.                                     | 0.30<br>175.00/hr | 52.50         |
|           | ECN | Communicate with E. Gysi, defense counsel, re mediation.                                                                                    | 0.20<br>650.00/hr | 130.00        |
|           | ECN | Confer with S. Lidman and P. Haines re [REDACTED]                                                                                           | 0.50<br>650.00/hr | 325.00        |
|           | SML | Confer with P. Haines and E. Nguyen re [REDACTED]                                                                                           | 0.50<br>750.00/hr | 375.00        |
| 8/21/2020 | MLM | Receive and review E. Nguyen's proposed changes to the draft joint stipulation and send to defense counsel, E. Gysi for review and comment. | 0.30<br>400.00/hr | 120.00        |
|           | MLM | Draft joint stipulation to continue CMC pending the Parties' private mediation and send to E. Nguyen to review.                             | 0.70<br>400.00/hr | 280.00        |
|           | DJ  | Communicate with Jeffrey Krivis' office re: mediation.                                                                                      | 0.10<br>175.00/hr | 17.50         |

1/21/2022

|            |     |                                                                                                                                   | <u>Hrs/Rate</u>   | <u>Amount</u> |
|------------|-----|-----------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 8/21/2020  | DJ  | Correspondence from E. Nguyen re: filing Stipulation to Continue CMC; update client file re: same; submit Stipulation to Court.   | 0.60<br>175.00/hr | 105.00        |
|            | ECN | Continue to communicate with E. Gysi, defense counsel, re mediation and meet and confer re stipulation and order to continue CMC. | 0.20<br>650.00/hr | 130.00        |
|            | SML | Monitor emails to defense counsel with draft joint stipulation to continue CMC pending mediation.                                 | 0.20<br>750.00/hr | 150.00        |
| 8/24/2020  | MLM | Confer with E. Nguyen re: proposed changes to Plaintiff's mediation requests and email to E. Gysi, defense counsel re: same.      | 0.40<br>400.00/hr | 160.00        |
|            | DJ  | Correspondence to Jeffrey Krivis' office enclosing Mediation and Agreement for Engagement of Mediation Services.                  | 0.10<br>175.00/hr | 17.50         |
|            | DJ  | Correspondence from E. Nguyen re: mediation confirmation documents; update client file re: same.                                  | 0.20<br>175.00/hr | 35.00         |
|            | ECN | Analyze and review [REDACTED]                                                                                                     | 0.80<br>650.00/hr | 520.00        |
|            | SML | Continue to monitor emails exchanged between defense counsel and M. Moore re mediation.                                           | 0.10<br>750.00/hr | 75.00         |
| 8/26/2020  | DJ  | Receive and process Order on Stipulation to Continue CMC; update client file re: same.                                            | 0.20<br>175.00/hr | 35.00         |
| 8/28/2020  | MLM | Receive and review notice of telephonic appearance for 9/1/20 CMC.                                                                | 0.10<br>400.00/hr | 40.00         |
|            | MLM | Receive and review the order granting the Parties' joint stipulation to continue CMC pending mediation.                           | 0.20<br>400.00/hr | 80.00         |
|            | SML | Receive and review notice of telephonic appearance for 9/1/20 CMC.                                                                | 0.10<br>750.00/hr | 75.00         |
| 8/31/2020  | DJ  | Correspondence from E. Nguyen re: service of Order on Stipulation to Continue CMC.                                                | 0.10<br>175.00/hr | 17.50         |
|            | ECN | Email to defense counsel re notice of continued CMC.                                                                              | 0.10<br>650.00/hr | 65.00         |
| 9/2/2020   | MLM | Review/analyze Case Management Order.                                                                                             | 0.40<br>400.00/hr | 160.00        |
| 11/10/2020 | MLM | Call with client re: [REDACTED]                                                                                                   | 0.70<br>400.00/hr | 280.00        |

1/21/2022

|            |     |                                                                                                                                             | <u>Hrs/Rate</u>   | <u>Amount</u> |
|------------|-----|---------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 12/10/2020 | MLM | Telephone call with R. Zuniga, defense counsel, re: status of pre-mediation data/information and email to E. Nguyen and S. Lidman re: same. | 0.60<br>400.00/hr | 240.00        |
|            | SML | Receive email from M. Moore re: her telephone call with R. Zuniga, defense counsel, re: status of pre-mediation data/information.           | 0.10<br>750.00/hr | 75.00         |
| 12/14/2020 | MLM | Telephone call with R. Zuniga, defense counsel, re: status of class list and email to E. Nguyen and S. Lidman re: same.                     | 0.40<br>400.00/hr | 160.00        |
|            | SML | Receive email from M. Moore re: her telephone call with R. Zuniga, defense counsel, re: status of class list.                               | 0.10<br>750.00/hr | 75.00         |
| 12/19/2020 | MLM | Received and reviewed email from R. Zuniga, defense counsel, with class list for random selection of timekeeping and payroll data.          | 0.10<br>400.00/hr | 40.00         |
| 12/21/2020 | MLM | Receive and review email from R. Zuniga, defense counsel, re: reducing sample size to 20%.                                                  | 0.10<br>400.00/hr | 40.00         |
|            | MLM | Review class list and email to D. Joudi, E. Nguyen and S. Lidman re: [REDACTED]                                                             | 0.20<br>400.00/hr | 80.00         |
|            | MLM | Confer with S. Lidman re: [REDACTED]                                                                                                        | 0.20<br>400.00/hr | 80.00         |
|            | MLM | Telephone call with R. Zuniga, defense counsel, re: other data requests production by 12/30/20.                                             | 0.30<br>400.00/hr | 120.00        |
|            | MLM | Exchange emails with R. Zuniga, defense counsel, re: randomly selected employees.                                                           | 0.50<br>400.00/hr | 200.00        |
|            | DJ  | Correspondence from M. Moore and S. Lidman re: random sampling of time and payroll data; prepare random sampling selection.                 | 0.30<br>175.00/hr | 52.50         |
|            | ECN | Review communications between M. Moore and R. Zuniga, counsel for Defendant, re data and information for mediation.                         | 0.20<br>650.00/hr | 130.00        |
|            | ECN | Analysis of class list and random sample for data and informal requests for mediation.                                                      | 0.60<br>650.00/hr | 390.00        |
|            | SML | Confer with M. Moore re: [REDACTED]                                                                                                         | 0.20<br>750.00/hr | 150.00        |
|            | SML | Review class list and review email from M. Moore re: random selection of 25% or 30 employees.                                               | 0.20<br>750.00/hr | 150.00        |
| 12/31/2020 | MLM | Receive and review email from R. Zuniga, defense counsel, re: informal document production.                                                 | 0.10<br>400.00/hr | 40.00         |

1/21/2022

|           |     |                                                                                                                                     | <u>Hrs/Rate</u>   | <u>Amount</u> |
|-----------|-----|-------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 1/4/2021  | MLM | Correspondence with R. Zuniga, defense counsel, re: access to informal document production.                                         | 0.30<br>400.00/hr | 120.00        |
|           | MLM | Receive direction from E. Nguyen re [REDACTED]<br>[REDACTED]                                                                        | 0.30<br>400.00/hr | 120.00        |
|           | MLM | Review/analyze first amended complaint to identify claims alleged to prepare for document review for mediation.                     | 0.40<br>400.00/hr | 160.00        |
|           | MLM | Review/analyze document production and evaluate additional information needed for mediation.                                        | 1.50<br>400.00/hr | 600.00        |
| 1/7/2021  | MLM | Correspondence with R. Zuniga, defense counsel, re: status of production of 2016 data.                                              | 0.20<br>400.00/hr | 80.00         |
| 1/8/2021  | MLM | Begin drafting mediation brief section on summary of claims.                                                                        | 1.10<br>400.00/hr | 440.00        |
| 1/11/2021 | MLM | Email to R. Zuniga, defense counsel, re: confirmation of receipt of 2016 data.                                                      | 0.10<br>400.00/hr | 40.00         |
| 1/12/2021 | MLM | Receive and review E. Nguyen's revisions to the task list for retained expert.                                                      | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Email to retained expert, M. Dumond, re: [REDACTED]<br>[REDACTED]                                                                   | 0.30<br>400.00/hr | 120.00        |
|           | MLM | Review informal data production and prepare task list for retained expert, M. Dumond and email to S. Lidman and E. Nguyen re: same. | 1.50<br>400.00/hr | 600.00        |
|           | ECN | Review and draft additions to communications to consultant re exposure analysis                                                     | 0.30<br>650.00/hr | 195.00        |
|           | SML | Review informal data production M. Moore's email to retained expert, M. Dumond for analysis needed for mediation.                   | 0.40<br>750.00/hr | 300.00        |
| 1/22/2021 | MLM | Receive and review completed task list from retained expert, M. Dumond, in advance of mediation.                                    | 1.70<br>400.00/hr | 680.00        |
|           | MLM | Continue drafting mediation brief, including section on legal analysis of claims.                                                   | 2.50<br>400.00/hr | 1,000.00      |
|           | ECN | Discuss [REDACTED]<br>[REDACTED]                                                                                                    | 0.30<br>650.00/hr | 195.00        |
|           | ECN | Prepare for mediation and evaluate exposure analysis and meal period analysis.                                                      | 0.90<br>650.00/hr | 585.00        |

1/21/2022

|           |     |                                                                                                                                   | <u>Hrs/Rate</u>   | <u>Amount</u> |
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| 1/22/2021 | SML | Discuss [REDACTED]<br>[REDACTED]                                                                                                  | 0.30<br>750.00/hr | 225.00        |
|           | SML | Receive and review completed task list from retained expert, M. Dumond, in advance of mediation.                                  | 1.00<br>750.00/hr | 750.00        |
| 1/28/2021 | MLM | Conduct research re: any other lawsuits against the company and receipt of any PPP loan.                                          | 0.30<br>400.00/hr | 120.00        |
|           | MLM | Draft MOU in advance of mediation.                                                                                                | 1.60<br>400.00/hr | 640.00        |
|           | ECN | Strategize with S. Lidman and P. Haines re [REDACTED]<br>[REDACTED]                                                               | 0.60<br>650.00/hr | 390.00        |
|           | SML | Strategize with E. Nguyen and P. Haines re [REDACTED]<br>[REDACTED]                                                               | 0.60<br>750.00/hr | 450.00        |
| 1/29/2021 | MLM | Email correspondence to referring attorney, F. Fong, re: [REDACTED]<br>[REDACTED]                                                 | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Correspondence with E. Nguyen and S. Lidman re: draft mediation brief, exhibits, and draft MOU.                                   | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Compile proposed exhibits for mediation brief.                                                                                    | 0.50<br>400.00/hr | 200.00        |
|           | MLM | Continue drafting mediation brief, including revisions to analysis and completion of section on Defendant's anticipated defenses. | 1.40<br>400.00/hr | 560.00        |
|           | SML | Receive and review draft mediation brief, exhibits, and draft MOU from M. Moore in advance of mediation.                          | 1.20<br>750.00/hr | 900.00        |
| 2/1/2021  | MLM | Confer with E. Nguyen and S. Lidman re: [REDACTED]<br>[REDACTED]                                                                  | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Call to R. Zuniga, defense counsel, re: shut down of operations and email re: same.                                               | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Correspondence with retained expert, [REDACTED]<br>[REDACTED]                                                                     | 0.30<br>400.00/hr | 120.00        |
|           | MLM | Correspondence with R. Zuniga, defense counsel, re: impending closing of Riverside facility.                                      | 0.40<br>400.00/hr | 160.00        |
|           | MLM | Receive and review E. Nguyen's proposed revisions to Plaintiff's mediation brief and revise accordingly.                          | 0.80<br>400.00/hr | 320.00        |

1/21/2022

|          |     |                                                                                                                                          | <u>Hrs/Rate</u>   | <u>Amount</u> |
|----------|-----|------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 2/1/2021 | ECN | Receive and review communication from R. Zuniga (defense counsel) regarding Defendant's operations.                                      | 0.20<br>650.00/hr | 130.00        |
|          | ECN | Receive and review further exposure analysis [REDACTED]                                                                                  | 0.20<br>650.00/hr | 130.00        |
|          | ECN | Review and revise updated mediation brief and review summary of [REDACTED]                                                               | 0.60<br>650.00/hr | 390.00        |
|          | ECN | Evaluate and research Defendant for mediation and review/revise mediation brief.                                                         | 1.40<br>650.00/hr | 910.00        |
|          | SML | Confer with E. Nguyen and M. Moore re: [REDACTED]                                                                                        | 0.20<br>750.00/hr | 150.00        |
| 2/2/2021 | MLM | Instruct D. Joudi to finalize and submit confidential mediation brief.                                                                   | 0.20<br>400.00/hr | 80.00         |
|          | MLM | Receive and review updated analysis from retained expert re: [REDACTED]                                                                  | 0.20<br>400.00/hr | 80.00         |
|          | MLM | Call with client re: [REDACTED]                                                                                                          | 0.70<br>400.00/hr | 280.00        |
|          | MLM | Revise mediation brief and email to E. Nguyen re: same.                                                                                  | 1.50<br>400.00/hr | 600.00        |
|          | DJ  | Correspondence from M. Moore re: finalizing and submitting mediation brief to mediator; finalize and submit mediation brief to mediator. | 0.30<br>175.00/hr | 52.50         |
|          | ECN | Confer with S. Lidman and P. Haines re [REDACTED]                                                                                        | 0.40<br>650.00/hr | 260.00        |
| 2/3/2021 | MLM | Receive and review email from E. Nguyen re: [REDACTED]                                                                                   | 0.90<br>400.00/hr | 360.00        |
|          | ECN | Analyze case law re [REDACTED]                                                                                                           | 0.30<br>650.00/hr | 195.00        |
| 2/9/2021 | MLM | Correspondence to R. Zuniga, defense counsel, with Plaintiff's mediation brief.                                                          | 0.10<br>400.00/hr | 40.00         |
|          | MLM | Review mediation brief prior to exchange with R. Zuniga, defense counsel.                                                                | 0.20<br>400.00/hr | 80.00         |
|          | MLM | Email from R. Zuniga, defense counsel, re: exchange of mediation briefs in advance of mediation and confer with E. Nguyen re: same.      | 0.50<br>400.00/hr | 200.00        |
|          | MLM | Receive and review Defendant's 97-page mediation brief.                                                                                  | 2.50<br>400.00/hr | 1,000.00      |

1/21/2022

|           |     |                                                                                                                                       | Hrs/Rate          | Amount   |
|-----------|-----|---------------------------------------------------------------------------------------------------------------------------------------|-------------------|----------|
| 2/9/2021  | ECN | Evaluate [REDACTED]<br>[REDACTED]                                                                                                     | 0.20<br>650.00/hr | 130.00   |
|           | ECN | Initial review of Defendant's 97 page mediation brief.                                                                                | 1.10<br>650.00/hr | 715.00   |
| 2/10/2021 | MLM | Create summary of [REDACTED]<br>[REDACTED]                                                                                            | 1.20<br>400.00/hr | 480.00   |
|           | ECN | Analyze [REDACTED]<br>[REDACTED]                                                                                                      | 0.30<br>650.00/hr | 195.00   |
|           | ECN | Confer with Lidman and P. Haines re [REDACTED]<br>[REDACTED]                                                                          | 0.30<br>650.00/hr | 195.00   |
|           | ECN | Strategize [REDACTED]                                                                                                                 | 0.40<br>650.00/hr | 260.00   |
|           | ECN | Finalize supplemental mediation brief and communicate with mediator re same.                                                          | 0.60<br>650.00/hr | 390.00   |
|           | SML | Confer with P. Haines and E. Nguyen re [REDACTED]<br>[REDACTED]                                                                       | 0.30<br>750.00/hr | 225.00   |
|           | SML | Confer and strategize with P. Haines and E. Nguyen re: [REDACTED]<br>[REDACTED]                                                       | 0.70<br>750.00/hr | 525.00   |
|           | SML | Review Defendant's mediation brief and M. Moore's summary of Defendant's main arguments and updated analysis in advance of mediation. | 1.50<br>750.00/hr | 1,125.00 |
| 2/11/2021 | MLM | Correspondence with D. Joudi re: zoom link information for mediation with Jeffrey Krivis.                                             | 0.30<br>400.00/hr | 120.00   |
|           | MLM | Call with client re: [REDACTED]                                                                                                       | 1.00<br>400.00/hr | 400.00   |
|           | MLM | Participate in mediation with Jeffrey Krivis, E. Nguyen.                                                                              | 6.00<br>400.00/hr | 2,400.00 |
|           | DJ  | Assist attorneys at mediation.                                                                                                        | 0.30<br>175.00/hr | 52.50    |
|           | ECN | Prepare for and attend mediation.                                                                                                     | 6.80<br>650.00/hr | 4,420.00 |
| 2/16/2021 | MLM | Call with client re: [REDACTED]<br>[REDACTED]                                                                                         | 0.20<br>400.00/hr | 80.00    |

1/21/2022

|           |     |                                                                                                                                                               | <u>Hrs/Rate</u>   | <u>Amount</u> |
|-----------|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 2/17/2021 | MLM | Create and circulate a fully executed version of settlement agreement.                                                                                        | 0.20<br>400.00/hr | 80.00         |
| 2/23/2021 | MLM | Correspondence with D. Joudi, E. Nguyen and S. Lidman re: preparatin of a joint notice of settlement.                                                         | 0.40<br>400.00/hr | 160.00        |
|           | DJ  | Correspondence with E. Nguyen, M. Moore, and S. Lidman re: timeline for filing Motion for Preliminary Approval                                                | 0.10<br>175.00/hr | 17.50         |
|           | ECN | Plan and prepare re drafting motion for preliminary approval.                                                                                                 | 0.60<br>650.00/hr | 390.00        |
|           | ECN | Begin to draft long form settlement agreement.                                                                                                                | 1.80<br>650.00/hr | 1,170.00      |
|           | SML | Review correspondence with D. Joudi, E. Nguyen and M. Moore re: preparation of a joint notice of settlement.                                                  | 0.20<br>750.00/hr | 150.00        |
|           | DJ  | Correspondence from E. Nguyen re: case administration; factual research re: same.                                                                             | 0.20<br>175.00/hr | 35.00         |
|           | DJ  | Draft Joint Notice of Settlement and Stipulation to Vacate Case Management Conference; correspondence with E. Nguyen, M. Moore, and S. Lidman re: same.       | 0.80<br>175.00/hr | 140.00        |
| 2/24/2021 | MLM | Correspondence with E. Nguyen re: requesting bids from multiple third party administrators.                                                                   | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Correspondence with D. Joudi re: status of joint notice of settlement.                                                                                        | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Email to E. Gysi, defense counsel, re: joint notice of settlement and proposed date for filing of motion for preliminary approval.                            | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Email to J. Lawrence of Phoenix Settlement Administrators re: bid for settlement administration.                                                              | 0.30<br>400.00/hr | 120.00        |
|           | MLM | Email to K. Sutherland of Simpluris re: bid for settlement administration.                                                                                    | 0.30<br>400.00/hr | 120.00        |
|           | ECN | Draft class notice, dispute regarding notice of settlement award, and exclusion request form, and objection form.                                             | 1.20<br>650.00/hr | 780.00        |
|           | SML | Monitor emails between M. Moore and J. Lawrence of Phoenix Settlement Administrators re: bid for settlement administration.                                   | 0.20<br>750.00/hr | 150.00        |
|           | SML | Monitor emails between M. Moore and E. Gysi, defense counsel, re: joint notice of settlement and proposed date for filing of motion for preliminary approval. | 0.20<br>750.00/hr | 150.00        |

1/21/2022

|           |     |                                                                                                                                                | <u>Hrs/Rate</u>   | <u>Amount</u> |
|-----------|-----|------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 2/24/2021 | SML | Monitor emails between M. Moore and K. Sutherland of Simpluris re: bid for settlement administration.                                          | 0.30<br>750.00/hr | 225.00        |
|           | SML | Confer with P. Haines and E. Nguyen re [REDACTED]<br>[REDACTED]                                                                                | 0.50<br>750.00/hr | 375.00        |
|           | DJ  | Receive signed Stipulation from defense counsel; update client file re: same.                                                                  | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Correspondence with M. Moore re: Stipulation to be filed.                                                                                      | 0.10<br>175.00/hr | 17.50         |
| 2/25/2021 | MLM | Receive and review E. Nguyen's email to E. Gysi, defense counsel, re: draft long form settlement and notice packet.                            | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Correspondence with E. Gysi, defense counsel re: filing of CMC statement along with joint notice of settlement.                                | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Receive E. Gysi's signature to joint notice of settlement and email to D. Joudi re: same.                                                      | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Confer with S. Lidman, E. Nguyen and D. Joudi re: filing CMC statement and review of draft statement.                                          | 0.50<br>400.00/hr | 200.00        |
|           | ECN | Review and approve draft stipulation re CMC.                                                                                                   | 0.20<br>650.00/hr | 130.00        |
|           | ECN | Revise and finalize long form agreement and exhibits to same.                                                                                  | 2.20<br>650.00/hr | 1,430.00      |
|           | SML | Confer with M. Moore, E. Nguyen and D. Joudi re: filing CMC statement and review of draft statement.                                           | 0.20<br>750.00/hr | 150.00        |
|           | DJ  | Receive signed Joint Report from defense counsel; update client file re: same.                                                                 | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Submit Joint Report for filing with Court; email copy to department clerk and service copy to defense counsel.                                 | 0.20<br>175.00/hr | 35.00         |
|           | DJ  | Correspondence from S. Lidman re: submitting Joint Report concurrently with Stipulation; prepare same.                                         | 0.90<br>175.00/hr | 157.50        |
| 3/1/2021  | MLM | Draft P. Haines declaration in support of motion of preliminary approval.                                                                      | 0.60<br>400.00/hr | 240.00        |
|           | MLM | Review and analyze Judge Reimer's Case Management Order and information needed for preliminary approval motions and plan and prepare for same. | 0.80<br>400.00/hr | 320.00        |

1/21/2022

|          |     |                                                                                                                                                                          | <u>Hrs/Rate</u>   | <u>Amount</u> |
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| 3/1/2021 | MLM | Research on Court's previous rulings on motions for preliminary approval.                                                                                                | 1.50<br>400.00/hr | 600.00        |
|          | MLM | Receive and review E. Gysi's, defense counsel, edits to the long form settlement agreement and class notice and email to E. Nguyen re: same.                             | 1.80<br>400.00/hr | 720.00        |
|          | MLM | Begin drafting memorandum of points and authorities in support of Plaintiff's motion for preliminary approval.                                                           | 4.50<br>400.00/hr | 1,800.00      |
|          | ECN | Initial review of Defendant's edits to long form settlement agreement and M. Moore's edits to same.                                                                      | 0.40<br>650.00/hr | 260.00        |
|          | SML | Monitor emails exchanged between defense counsel and M. Moore re: long form settlement agreement.                                                                        | 0.10<br>750.00/hr | 75.00         |
| 3/2/2021 | MLM | Receive and review minute order vacating 3/4/21 CMC and setting motion for preliminary approval for 5/11/21.                                                             | 0.10<br>400.00/hr | 40.00         |
|          | MLM | Receive and review order granting joint stipulation to vacate CMC and set PA motion hearing date.                                                                        | 0.20<br>400.00/hr | 80.00         |
|          | MLM | Email to E. Gysi, defense counsel, re: further revised settlement agreement, bids from administrator and defense counsel's declaration.                                  | 0.60<br>400.00/hr | 240.00        |
|          | MLM | Continue to revise long form settlement agreement to comply with terms in MOU and email to E. Nguyen re: same.                                                           | 1.10<br>400.00/hr | 440.00        |
|          | ECN | Review M. Moore's draft email to defense counsel for defendant's declaration in support of preliminary approval.                                                         | 0.30<br>650.00/hr | 195.00        |
|          | SML | Receive and review email from M. Moore to E. Gysi, defense counsel, re: further revised settlement agreement, bids from administrator and defense counsel's declaration. | 0.20<br>750.00/hr | 150.00        |
|          | SML | Compare/contrast long form settlement agreement and signed memorandum of understanding.                                                                                  | 0.80<br>750.00/hr | 600.00        |
|          | DJ  | Receive and process conformed copy of Joint Statement; update client file re: same.                                                                                      | 0.10<br>175.00/hr | 17.50         |
| 3/3/2021 | MLM | Receive email from E. Gysi, defense counsel re: revised settlement agreement and references to CMO for issues to be addressed by defense counsel's declaration.          | 0.10<br>400.00/hr | 40.00         |
|          | MLM | Confer with E. Nguyen and D. Joudi re: 3/4/21 Status Conference being vacated.                                                                                           | 0.20<br>400.00/hr | 80.00         |
|          | ECN | Monitor communications between D. Joudi and M. Moore re status fo CMC.                                                                                                   | 0.20<br>650.00/hr | 130.00        |

1/21/2022

|          |     |                                                                                                                                                       | <u>Hrs/Rate</u>   | <u>Amount</u> |
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| 3/3/2021 | DJ  | Correspondence to defense counsel re: minute order vacating Case Management Conference                                                                | 0.10<br>175.00/hr | 17.50         |
|          | DJ  | Contact Court to seek clarification on newly scheduled hearing.                                                                                       | 0.20<br>175.00/hr | 35.00         |
|          | DJ  | Correspondence from M. Moore and E. Nguyen re: vacated Case Management Conference and seeking clarification on newly scheduled hearing.               | 0.20<br>175.00/hr | 35.00         |
|          | DJ  | Factual research re: Stipulation and Order                                                                                                            | 0.20<br>175.00/hr | 35.00         |
| 3/4/2021 | MLM | Draft introduction for motion for preliminary approval.                                                                                               | 0.20<br>400.00/hr | 80.00         |
|          | MLM | Draft notice of motion for preliminary approval.                                                                                                      | 0.30<br>400.00/hr | 120.00        |
|          | MLM | Email to E. Gysi, defense counsel, re: finalized settlement agreement and the declaration topics with cites to the court's CMO.                       | 0.40<br>400.00/hr | 160.00        |
|          | MLM | Confer with E. Nguyen re: finalizing settlement agreement, preparing execution version, and information needed in defense counsel's declaration.      | 0.50<br>400.00/hr | 200.00        |
|          | MLM | Finalize settlement agreement and further revise class notice.                                                                                        | 0.70<br>400.00/hr | 280.00        |
|          | MLM | Continue drafting memorandum of points and authorities in support of Plaintiff's motion for preliminary approval.                                     | 0.70<br>400.00/hr | 280.00        |
|          | MLM | Draft S. Lidman declaration in support of Plaintiff's motion for preliminary approval.                                                                | 0.70<br>400.00/hr | 280.00        |
|          | MLM | Draft E. Nguyen declaration in support of Plaintiff's motion for preliminary approval.                                                                | 1.40<br>400.00/hr | 560.00        |
|          | ECN | Draft additions to updated version of long form settlement agreement and class notice and compare/contrast with CMO re compliance.                    | 0.40<br>650.00/hr | 260.00        |
|          | SML | Receive email from M. Moore to E. Gysi, defense counsel, re: finalized settlement agreement and the declaration topics with cites to the court's CMO. | 0.30<br>750.00/hr | 225.00        |
| 3/8/2021 | MLM | Correspondence with E. Gysi, defense counsel, re: confirmation of long form agreement being ready for signatures.                                     | 0.20<br>400.00/hr | 80.00         |
| 3/9/2021 | MLM | Receive Defendant's signature to long form settlement agreement.                                                                                      | 0.10<br>400.00/hr | 40.00         |

1/21/2022

|           |     |                                                                                                                                                                                          | <u>Hrs/Rate</u>   | <u>Amount</u> |
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| 3/9/2021  | MLM | Call with client re: [REDACTED]                                                                                                                                                          | 1.10<br>400.00/hr | 440.00        |
|           | MLM | Draft client's declaration in support of motion for approval and email to E. Nguyen re: same.                                                                                            | 1.80<br>400.00/hr | 720.00        |
|           | SML | Confer with P. Haines re status of settlement agreement and timeline for filing motion for preliminary approval.                                                                         | 0.40<br>750.00/hr | 300.00        |
| 3/10/2021 | MLM | Confer with E. Nguyen, S. Lidman and D. Joudi re: preparing motion for preliminary approval.                                                                                             | 0.20<br>400.00/hr | 80.00         |
|           | ECN | Confer with S. Lidman, M. Moore and D. Joudi re: preparing motion for preliminary approval.                                                                                              | 0.20<br>650.00/hr | 130.00        |
|           | SML | Confer with E. Nguyen, M. Moore and D. Joudi re: preparing motion for preliminary approval.                                                                                              | 0.20<br>750.00/hr | 150.00        |
|           | DJ  | Correspondence with M. Moore and E. Nguyen re: timeline for filing and hearing on Motion for Preliminary Approval of Class Action Settlement.                                            | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Reserve May 19, 2021 as hearing date on Plaintiff's Motion for Preliminary Approval of Class Action Settlement; correspondence to defense counsel re: same; update client file re: same. | 0.30<br>175.00/hr | 52.50         |
| 3/11/2021 | MLM | Draft my declaration in support of Plaintiff's motion for preliminary approval.                                                                                                          | 0.30<br>400.00/hr | 120.00        |
|           | MLM | Incorporate E. Nguyen's revisions to client's declaration and finalized for execution.                                                                                                   | 0.30<br>400.00/hr | 120.00        |
|           | ECN | Analyze [REDACTED]                                                                                                                                                                       | 0.30<br>650.00/hr | 195.00        |
|           | SML | Confer with P. Haines and E. Nguyen re [REDACTED]                                                                                                                                        | 0.30<br>750.00/hr | 225.00        |
|           | SML | Review and revise my declaration in support of motion for preliminary approval.                                                                                                          | 0.40<br>750.00/hr | 300.00        |
| 3/12/2021 | DJ  | Process settlement documents received from client; update client file re: same.                                                                                                          | 0.20<br>175.00/hr | 35.00         |
| 3/26/2021 | MLM | Receive client's signature to long form agreement and send E. Gysi, defense counsel, fully executed version.                                                                             | 0.20<br>400.00/hr | 80.00         |
| 4/1/2021  | MLM | Receive email from E. Gysi, with declaration from Defendant and confirmation of total number of employees.                                                                               | 0.10<br>400.00/hr | 40.00         |

1/21/2022

|           |     |                                                                                                                                                                                                                                      | <u>Hrs/Rate</u>   | <u>Amount</u> |
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| 4/1/2021  | MLM | Review declaration from Defendant to ensure compliance with the court's CMO.                                                                                                                                                         | 0.40<br>400.00/hr | 160.00        |
|           | ECN | Receive and review defendant's declaration in support of preliminary approval.                                                                                                                                                       | 0.20<br>650.00/hr | 130.00        |
|           | SML | Confer with P. Haines and E. Nguyen re [REDACTED]                                                                                                                                                                                    | 0.50<br>750.00/hr | 375.00        |
| 4/2/2021  | MLM | Receive and review E. Nguyen's proposed changes to administrator declaration and email to J. Lawrence of Phoenix re: same.                                                                                                           | 0.30<br>400.00/hr | 120.00        |
|           | MLM | Draft administrator, Phoenix declaration in support of motion for preliminary approval and correspondence re same.                                                                                                                   | 0.60<br>400.00/hr | 240.00        |
|           | MLM | Prepare declaration for J. Lawrence of Phoenix Settlement Administrators for Plaintiff's Motion for Preliminary Approval and email to E. Nguyen re: same.                                                                            | 1.50<br>400.00/hr | 600.00        |
| 4/6/2021  | MLM | Email to E. Nguyen with drafts of preliminary approval motion and supporting documents.                                                                                                                                              | 0.30<br>400.00/hr | 120.00        |
|           | MLM | Review of information produced by defense counsel to calculate the maximum and minimum amount a putative class member could receive as part of settlement.                                                                           | 0.50<br>400.00/hr | 200.00        |
|           | MLM | Draft proposed order granting preliminary approval.                                                                                                                                                                                  | 0.90<br>400.00/hr | 360.00        |
| 4/8/2021  | MLM | Further revise and incorporate E. Nguyen's changes to memorandum of points and authorities in support of motion for preliminary approval.                                                                                            | 0.80<br>400.00/hr | 320.00        |
|           | MLM | Receive and review E. Nguyen's edits to the memorandum of points and authorities in support of Plaintiff's Motion for Preliminary Approval.                                                                                          | 1.70<br>400.00/hr | 680.00        |
|           | ECN | Review and revise motion for preliminary approval and compare/contrast with CMO re compliance with same.                                                                                                                             | 2.20<br>650.00/hr | 1,430.00      |
| 4/9/2021  | MLM | Call with client re: [REDACTED]                                                                                                                                                                                                      | 0.30<br>400.00/hr | 120.00        |
|           | ECN | Review and revise amended agreement and exhibits thereto and review and revise supplemental brief and proposed order and compare/contrast with court's ruling to confirm revised agreement addresses all issues identified by court. | 1.80<br>650.00/hr | 1,170.00      |
| 4/12/2021 | MLM | Further revise and incorporate E. Nguyen's changes to her declaration in support of motion for preliminary approval.                                                                                                                 | 0.40<br>400.00/hr | 160.00        |

1/21/2022

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| 4/12/2021 | MLM | Further revise declaration of E. Nguyen in support of motion for preliminary approval to comply with MPA.                                                              | 0.50<br>400.00/hr | 200.00        |
|           | MLM | Further revise compliance chart in support of Motion for Preliminary Approval.                                                                                         | 1.60<br>400.00/hr | 640.00        |
| 4/13/2021 | MLM | Email to E. Nguyen with further revised MPA and declaration in support of motion for preliminary approval.                                                             | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Receive and review E. Nguyen's further revisions to the MPA and declaration.                                                                                           | 0.80<br>400.00/hr | 320.00        |
|           | ECN | Review and approve proposed order for motion for preliminary approval.                                                                                                 | 0.40<br>650.00/hr | 260.00        |
|           | ECN | Review and draft additions to E. Nguyen declaration in support of preliminary approval and updated motion for preliminary approval.                                    | 1.50<br>650.00/hr | 975.00        |
| 4/15/2021 | MLM | Email to E. Nguyen and S. Lidman with revised MPA, declaration and compliance chart.                                                                                   | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Receive instruction from E. Nguyen re: [REDACTED]                                                                                                                      | 0.40<br>400.00/hr | 160.00        |
|           | MLM | Revise declaration of E. Nguyen based on edits to MPA.                                                                                                                 | 0.40<br>400.00/hr | 160.00        |
|           | MLM | Make further edits to compliance chart based on changes to MPA.                                                                                                        | 0.60<br>400.00/hr | 240.00        |
|           | MLM | Continue to revise MPA in support of motion for preliminary approval.                                                                                                  | 1.10<br>400.00/hr | 440.00        |
|           | ECN | Review, revise and draft additions to compliance chart.                                                                                                                | 4.00<br>650.00/hr | 2,600.00      |
|           | SML | Receive and review M. Moore's email with revised MPA, declaration and compliance chart.                                                                                | 1.20<br>750.00/hr | 900.00        |
| 4/16/2021 | MLM | Correspondence with D. Joudi re: finalizing the motion for preliminary approval and supporting documents.                                                              | 0.20<br>400.00/hr | 80.00         |
|           | DJ  | Correspondence from M. Moore re: Plaintiff's Motion of Preliminary Approval of Class Action Settlement and instructions re: finalizing documents in support of Motion. | 0.10<br>175.00/hr | 17.50         |
| 4/19/2021 | DJ  | Finalize documents in support of Motion for Preliminary Approval of Class Action Settlement.                                                                           | 0.50<br>175.00/hr | 87.50         |

1/21/2022

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| 4/20/2021 | DJ  | Continue to finalize documents in support of Motion for Preliminary Approval of Class Action Settlement.                                                                            | 0.80<br>175.00/hr | 140.00        |
| 4/21/2021 | MLM | Receive and review motion for preliminary approval and propose edits and email to D. Joudi re: same.                                                                                | 1.50<br>400.00/hr | 600.00        |
|           | DJ  | Continue to finalize documents in support of Motion for Preliminary Approval of Class Action Settlement; correspondence to M. Moore, E. Nguyen, and S. Lidman re: same.             | 1.10<br>175.00/hr | 192.50        |
| 4/22/2021 | DJ  | Receive comments from M. Moore re: corrections to documents in support of Motion for Preliminary Approval of Class Action Settlement; update documents re: same.                    | 0.40<br>175.00/hr | 70.00         |
| 4/23/2021 | MLM | Receive and review E. Nguyen's proposed changes for the motion and supporting documents.                                                                                            | 0.30<br>400.00/hr | 120.00        |
|           | MLM | Continue to review MPA and other supporting documents and make revisions to compliance chart.                                                                                       | 3.50<br>400.00/hr | 1,400.00      |
|           | ECN | Provide direction to D. Joudi re preparation of index to compendium in support of preliminary approval.                                                                             | 0.20<br>650.00/hr | 130.00        |
|           | ECN | Final review of PDFs of motion for preliminary approval and supporting documents.                                                                                                   | 0.70<br>650.00/hr | 455.00        |
|           | DJ  | Receive further comments from M. Moore re: corrections to documents in support of Motion for Preliminary Approval of Class Action Settlement; update documents re: same.            | 0.60<br>175.00/hr | 105.00        |
|           | DJ  | Receive additional comments from M. Moore re: further corrections to documents in support of Motion for Preliminary Approval of Class Action Settlement; update documents re: same. | 0.80<br>175.00/hr | 140.00        |
| 4/26/2021 | MLM | Final review of motion and supporting documents prior to filing.                                                                                                                    | 0.70<br>400.00/hr | 280.00        |
|           | DJ  | Factual research re: Judge Riemer's requirement for courtesy copies of motions; email to E. Nguyen, M. Moore, and S. Lidman re: same.                                               | 0.40<br>175.00/hr | 70.00         |
|           | DJ  | Finalize documents in support of Motion for Preliminary Approval of Class Action Settlement and prepare to file same.                                                               | 0.60<br>175.00/hr | 105.00        |
|           | DJ  | Submit Motion for Preliminary Approval to LWDA and to Court via e-Submit for same-day filing; email service copy of Motion documents to defense counsel.                            | 0.70<br>175.00/hr | 122.50        |
| 4/27/2021 | MLM | Receive and review notice of telephonic appearance for 5/11/21 PA hearing.                                                                                                          | 0.10<br>400.00/hr | 40.00         |

1/21/2022

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| 4/27/2021 | SML | Receive and review notice of telephonic appearance for 5/11/21 PA hearing.                                                                                                                                                                                                                                   | 0.10<br>750.00/hr | 75.00         |
| 5/6/2021  | MLM | Confer with E. Nguyen and D. Joudi re: upcoming status conference.                                                                                                                                                                                                                                           | 0.20<br>400.00/hr | 80.00         |
|           | ECN | Exchange emails with defense counsel (J. Bowles and E. Gysi) re stipulation to continue status conference.                                                                                                                                                                                                   | 0.30<br>650.00/hr | 195.00        |
|           | DJ  | Monitor correspondence from E. Nguyen to defense counsel re: approving and signing Joint Statement and Joint Stipulation to Continue; receive signatures from defense counsel; update client file re: same; submit documents for filing with Court via e-Submit and email service copies to defense counsel. | 0.30<br>175.00/hr | 52.50         |
|           | DJ  | Prepare Joint Statement and Joint Stipulation to Continue Case Management Conference (to same date as Motion for Preliminary Approval) in light of Court's continuance of Motion hearing from May 19, 2021 to July 7, 2021; correspondence with E. Nugyen and M. Moore re: same.                             | 0.80<br>175.00/hr | 140.00        |
| 5/10/2021 | MLM | Receive and review order vacating status conference.                                                                                                                                                                                                                                                         | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Correspondence with D. Joudi and E. Nguyen re: 5/11/21 Status Conference being vacated.                                                                                                                                                                                                                      | 0.30<br>400.00/hr | 120.00        |
|           | ECN | Email to OPC re minute order.                                                                                                                                                                                                                                                                                | 0.20<br>650.00/hr | 130.00        |
|           | ECN | Prepare for status conference and check on status of stipulation                                                                                                                                                                                                                                             | 0.40<br>650.00/hr | 260.00        |
|           | SML | Receive and review order vacating status conference.                                                                                                                                                                                                                                                         | 0.10<br>750.00/hr | 75.00         |
|           | DJ  | Obtain Court's Minute Order from Court's website; update client file re: same.                                                                                                                                                                                                                               | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Correspondence with E. Nguyen re: status of proposed Stipulation to Continue and factual research re: same.                                                                                                                                                                                                  | 0.20<br>175.00/hr | 35.00         |
|           | DJ  | Further factual research re: proposed Stipulation to Continue; correspondence with E. Nguyen and M. Moore re: Court's vacating Case Management Conference per Parties' proposed Stipulation.                                                                                                                 | 0.20<br>175.00/hr | 35.00         |
|           | DJ  | Follow up and continued factual research re: proposed Stipulation to Continue.                                                                                                                                                                                                                               | 0.30<br>175.00/hr | 52.50         |

1/21/2022

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| 6/1/2021  | MLM | Call with client re: [REDACTED]<br>[REDACTED]                                                                                                                                                                                  | 0.40<br>400.00/hr | 160.00        |
| 6/30/2021 | DJ  | Correspondence with E. Nguyen re: defense counsel's receipt of notice re: continued hearing on Motion for Preliminary Approval of Class Action Settlement.                                                                     | 0.10<br>175.00/hr | 17.50         |
| 7/6/2021  | MLM | Receive and review notice of telephonic appearance for 7/7/21 hearing.                                                                                                                                                         | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Review Court's tentative ruling on Plaintiff's Motion for Preliminary Approval and confer with E. Nguyen re: same.                                                                                                             | 0.50<br>400.00/hr | 200.00        |
|           | ECN | Review tentative ruling on motion for preliminary approval and provide direction to M. Moore edits to agreement for same and email to defense counsel re tentative ruling and proposed course of action in advance of hearing. | 0.80<br>650.00/hr | 520.00        |
|           | ECN | Review tentative and communicate with OPC re same.                                                                                                                                                                             | 1.10<br>650.00/hr | 715.00        |
|           | SML | Receive and review notice of telephonic appearance for 7/7/21 hearing.                                                                                                                                                         | 0.10<br>750.00/hr | 75.00         |
|           | SML | Review Court's tentative ruling on Plaintiff's Motion for Preliminary Approval.                                                                                                                                                | 0.40<br>750.00/hr | 300.00        |
|           | DJ  | Communicate with defense counsel re: Plaintiff's request for oral argument on July 7, 2021.                                                                                                                                    | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Contact Court to seek clarification on tentative ruling; email to M. Moore, E. Nguyen, and S. Lidman re: same.                                                                                                                 | 0.20<br>175.00/hr | 35.00         |
|           | DJ  | Correspondence with E. Nguyen re: timeline for filing and hearing continued Motion for Preliminary Approval of Class Action Settlement; reserve hearing date on: same.                                                         | 0.20<br>175.00/hr | 35.00         |
|           | DJ  | Correspondence with E. Nguyen re: informing defense counsel of Plaintiff's request for oral argument after issuance of tentative ruling; correspondence to defense counsel re: same.                                           | 0.20<br>175.00/hr | 35.00         |
|           | DJ  | Factual research re: defense counsel's receipt of notice of continuance of hearing from Court; correspondence with E. Nguyen re: same.                                                                                         | 0.20<br>175.00/hr | 35.00         |
|           | DJ  | Receive tentative ruling on Motion for Preliminary Approval; update client file re: same; correspondence from E. Nguyen re: seeking clarification on Court's tentative ruling.                                                 | 0.30<br>175.00/hr | 52.50         |
| 7/7/2021  | MLM | Appear at hearing on motion for preliminary approval and Court gave guidance on changes needed to the agreement and notice packet.                                                                                             | 0.50<br>400.00/hr | 200.00        |

1/21/2022

|           |     |                                                                                                                                                              | <u>Hrs/Rate</u>   | <u>Amount</u> |
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| 7/7/2021  | ECN | Review summary of hearing on preliminary approval.                                                                                                           | 0.20<br>650.00/hr | 130.00        |
| 7/8/2021  | MLM | Draft supplemental administrator declaration to confirm flat fee.                                                                                            | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Email to E. Nguyen and S. Lidman with supplemental briefing and amended settlement documents.                                                                | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Draft amended stipulation of settlement agreement to address issues identified in Court's tentative, including clarifying Phoenix's flat fee.                | 0.40<br>400.00/hr | 160.00        |
|           | MLM | Draft amended proposed order to comply with Court's tentative ruling.                                                                                        | 0.40<br>400.00/hr | 160.00        |
|           | MLM | Draft amended class notice to change any legal jargon in compliance with Court's tentative ruling.                                                           | 0.60<br>400.00/hr | 240.00        |
|           | MLM | Draft supplemental declaration of E. Nguyen in accordance with supplemental brief.                                                                           | 0.70<br>400.00/hr | 280.00        |
|           | MLM | Draft supplemental brief addressing issues identified in Court's tentative ruling.                                                                           | 1.50<br>400.00/hr | 600.00        |
|           | ECN | Confer with S. Lidman and E. Nguyen re: [REDACTED]                                                                                                           | 0.30<br>650.00/hr | 195.00        |
|           | SML | Confer with P. Haines and E. Nguyen re: [REDACTED]                                                                                                           | 0.30<br>750.00/hr | 225.00        |
|           | SML | Receive and review amended settlement agreement.                                                                                                             | 0.80<br>750.00/hr | 600.00        |
|           | SML | Receive and review M. Moore's email with supplemental briefing and amended settlement documents.                                                             | 1.50<br>750.00/hr | 1,125.00      |
| 7/9/2021  | MLM | Receive and review E. Nguyen's proposed changes to the supplemental briefing and guidance on further changes needed to comply with Court's tentative ruling. | 0.70<br>400.00/hr | 280.00        |
| 7/12/2021 | MLM | Correspondence with J. Lawrence of Phoenix re: supplemental administrative declaration.                                                                      | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Email to E. Gysi and R. Zuniga, defense counsel, re: amended settlement and supplemental brief.                                                              | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Call with R. Zuniga, defense counsel re: copy of PA motion and email re: same.                                                                               | 0.30<br>400.00/hr | 120.00        |

1/21/2022

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| 7/12/2021 | MLM | Further revise supplemental briefing based on E. Nguyen's guidance.                                                                                | 1.50<br>400.00/hr | 600.00        |
|           | SML | Monitor emails with M. Moore, E. Gysi and R. Zuniga, defense counsel, re: amended settlement and supplemental brief.                               | 0.20<br>750.00/hr | 150.00        |
| 7/14/2021 | MLM | Email correspondence with R. Zuniga, defense counsel, re: scheduling telephonic conference to discuss amended agreement and supplemental briefing. | 0.30<br>400.00/hr | 120.00        |
| 7/15/2021 | MLM | Email to R. Zuniga, defense counsel, re: further revised amended settlement and supplemental briefing.                                             | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Telephonic conference with R. Zuniga, defense counsel, re: amended agreement and proposed changes to comply with Court's order.                    | 0.50<br>400.00/hr | 200.00        |
|           | ECN | Prepare for call with defense counsel re amended documents.                                                                                        | 0.30<br>650.00/hr | 195.00        |
|           | ECN | TC with Richard Zuniga and MM re revisions to amended documents and continue to make revisions post-call.                                          | 0.90<br>650.00/hr | 585.00        |
| 7/21/2021 | MLM | Receive R. Zuniga's further edits to the Class Notice and confer with E. Nguyen re: same.                                                          | 0.30<br>400.00/hr | 120.00        |
|           | ECN | Receive and review email from R. Zuniga re edits to notice.                                                                                        | 0.10<br>650.00/hr | 65.00         |
| 7/22/2021 | MLM | Email to R. Zuniga, defense counsel, with final amended settlement agreement.                                                                      | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Confer with E. Nguyen re: R. Zuniga, defense counsel, further revisions to settlement agreement and class notice.                                  | 0.30<br>400.00/hr | 120.00        |
|           | MLM | Call with R. Zuniga, defense counsel, re: additional revisions to agreement and class notice.                                                      | 0.40<br>400.00/hr | 160.00        |
|           | ECN | Review additional proposed changes to agreement and settlement docs from R. Zuniga (defense counsel).                                              | 0.40<br>650.00/hr | 260.00        |
| 7/23/2021 | MLM | Further revise the settlement agreement and notice packet and email to R. Zuniga, defense counsel, re: same.                                       | 0.80<br>400.00/hr | 320.00        |
| 7/26/2021 | MLM | Receive confirmation from R. Zuniga, defense counsel, re: amended agreement being ready for execution.                                             | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Call with client re: [REDACTED]                                                                                                                    | 0.60<br>400.00/hr | 240.00        |

1/21/2022

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| 7/26/2021 | SML | Monitor emails from M. Moore and R. Zuniga, defense counsel, re: amended agreement being ready for execution.                                                                    | 0.10<br>750.00/hr | 75.00         |
| 7/29/2021 | MLM | Receive and review [REDACTED]                                                                                                                                                    | 0.20<br>400.00/hr | 80.00         |
|           | ECN | Exchange emails with R. Zuniga (defense counsel) re settlement agreement.                                                                                                        | 0.20<br>650.00/hr | 130.00        |
| 8/2/2021  | MLM | Receive executed amended settlement agreement from R. Zuniga, defense counsel.                                                                                                   | 0.10<br>400.00/hr | 40.00         |
| 8/3/2021  | MLM | Confer with E. Nguyen re: supplemental brief edits to address additional changes made to amended agreement.                                                                      | 0.20<br>400.00/hr | 80.00         |
| 8/4/2021  | ECN | Review/revise supplemental brief.                                                                                                                                                | 0.30<br>650.00/hr | 195.00        |
| 8/5/2021  | MLM | Provide guidance to D. Joudi to finalize supplemental brief and amended settlement agreement in support of motion for preliminary approval.                                      | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Revise supplemental declaration of E. Nguyen.                                                                                                                                    | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Continue to revise supplemental brief in support of motion for preliminary approval.                                                                                             | 0.40<br>400.00/hr | 160.00        |
|           | MLM | Receive and review E. Nguyen's feedback on supplemental brief in support of motion for preliminary approval.                                                                     | 0.50<br>400.00/hr | 200.00        |
|           | ECN | Review and revise [amended proposed] order.                                                                                                                                      | 0.30<br>650.00/hr | 195.00        |
|           | ECN | Draft additions to updated supplemental brief and draft additions to Supp. Nguyen Declaration                                                                                    | 1.00<br>650.00/hr | 650.00        |
|           | DJ  | Review correspondence from M. Moore re: finalizing supplemental briefing in support of Motion for Preliminary Approval of Class Action Settlement; prepare documents for filing. | 0.40<br>175.00/hr | 70.00         |
| 8/9/2021  | MLM | Receive finalized supplemental brief and supporting documents from D. Joudi to review.                                                                                           | 0.10<br>400.00/hr | 40.00         |
|           | DJ  | Obtain documents from Court's website; update client file re: same.                                                                                                              | 0.20<br>175.00/hr | 35.00         |
| 8/10/2021 | MLM | Review supplemental brief and supporting documents in support of motion for preliminary approval and email to D. Joudi re: same.                                                 | 1.00<br>400.00/hr | 400.00        |

1/21/2022

|           |     |                                                                                                                                                                                                     | <u>Hrs/Rate</u>   | <u>Amount</u> |
|-----------|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 8/10/2021 | SML | Review supplemental brief and supporting documents in support of motion for preliminary approval.                                                                                                   | 0.50<br>750.00/hr | 375.00        |
|           | DJ  | Receive comments from M. Moore re: corrections to supplemental briefing in support of Motion for Preliminary Approval of Class Action Settlement; make corrections accordingly.                     | 0.40<br>175.00/hr | 70.00         |
| 8/16/2021 | MLM | Receive and review E. Nguyen's proposed changes to supplemental briefing.                                                                                                                           | 0.40<br>400.00/hr | 160.00        |
|           | ECN | Review and update supplemental brief and review/revise exhibits.                                                                                                                                    | 1.80<br>650.00/hr | 1,170.00      |
|           | SML | Review supplemental briefing to ensure address issues identified by Court.                                                                                                                          | 0.50<br>750.00/hr | 375.00        |
|           | DJ  | Receive comments from E. Nguyen re: corrections to supplemental briefing in support of Motion for Preliminary Approval of Class Action Settlement; make corrections accordingly.                    | 0.30<br>175.00/hr | 52.50         |
| 8/18/2021 | MLM | Final review of supplemental brief and supporting documents in support of motion for preliminary approval.                                                                                          | 0.70<br>400.00/hr | 280.00        |
|           | DJ  | Finalize documents in support of supplemental briefing in support of Motion for Preliminary Approval of Class Action Settlement; prepare service copies; submit for filing with Court via e-Submit. | 0.60<br>175.00/hr | 105.00        |
| 8/21/2021 | ECN | Review and revise stipulation to continue status conference.                                                                                                                                        | 0.20<br>650.00/hr | 130.00        |
| 9/10/2021 | MLM | Review tentative ruling on Plaintiff's Motion for Preliminary Approval.                                                                                                                             | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Prepare amended proposed order in compliance with tentative ruling and email to R. Zuniga, defense counsel re: same.                                                                                | 0.30<br>400.00/hr | 120.00        |
|           | ECN | Receive and review court's tentative ruling on continued hearing on motion for preliminary approval.                                                                                                | 0.10<br>650.00/hr | 65.00         |
|           | SML | Review amended proposed order.                                                                                                                                                                      | 0.10<br>750.00/hr | 75.00         |
|           | SML | Monitor emails with M. Moore and R. Zuniga, defense counsel re: amended proposed order in compliance with tentative ruling.                                                                         | 0.10<br>750.00/hr | 75.00         |
|           | SML | Receive and review tentative ruling on Plaintiff's motion for preliminary approval.                                                                                                                 | 0.20<br>750.00/hr | 150.00        |
|           | DJ  | Correspondence from M. Moore re: Court's tentative ruling on Motion for Preliminary Approval of Class Action Settlement; receive instructions re: submission of Second Amended Proposed Order to    | 0.10<br>175.00/hr | 17.50         |

1/21/2022

|           |     |                                                                                                                                                              | <u>Hrs/Rate</u>   | <u>Amount</u> |
|-----------|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
|           |     | Court.                                                                                                                                                       |                   |               |
| 9/13/2021 | MLM | Provide guidance to D. Joudi re: submission of amended order and exhibits.                                                                                   | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Correspondence with R. Zuniga, defense counsel, re: submitting amended proposed order.                                                                       | 0.20<br>400.00/hr | 80.00         |
|           | DJ  | Correspondence from M. Moore re: submission of Second Amended Proposed Order to Court; submit same.                                                          | 0.20<br>175.00/hr | 35.00         |
| 9/14/2021 | MLM | Email from R. Zuniga, defense counsel, re: status of signed order granting preliminary approval.                                                             | 0.10<br>400.00/hr | 40.00         |
|           | SML | Monitor emails between M. Moore and R. Zuniga, defense counsel, re: status of signed order granting preliminary approval.                                    | 0.10<br>750.00/hr | 75.00         |
| 9/15/2021 | MLM | Correspondence with R. Zuniga, defense counsel re: order granting preliminary approval.                                                                      | 0.20<br>400.00/hr | 80.00         |
|           | SML | Monitor emails between M. Moore and R. Zuniga, defense counsel re: order granting preliminary approval.                                                      | 0.20<br>750.00/hr | 150.00        |
|           | DJ  | Follow up with Court clerk re: status of signed Second Amended Proposed Order; email to M. Moore and E. Nguyen re: same.                                     | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Correspondence with M. Moore and E. Nguyen re: following up with Court's approval of Second Amended Proposed Order; follow up re: same by telephoning Court. | 0.20<br>175.00/hr | 35.00         |
| 9/16/2021 | DJ  | Attempt to follow up with Court clerk re: status of signed Second Amended Proposed Order; email to M. Moore and E. Nguyen re: same.                          | 0.10<br>175.00/hr | 17.50         |
| 9/17/2021 | DJ  | Continue to follow up with Court clerk re: status of signed Second Amended Proposed Order; email to M. Moore and E. Nguyen re: same.                         | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Factual research re: status of signed Second Amended Proposed Order; email to M. Moore and E. Nguyen re: same.                                               | 0.10<br>175.00/hr | 17.50         |
| 9/20/2021 | DJ  | Further follow up to Court clerk re: status of signed Second Amended Proposed Order; email to M. Moore and E. Nguyen re: same.                               | 0.10<br>175.00/hr | 17.50         |
| 9/21/2021 | MLM | Correspondence with R. Zuniga, defense counsel re: unsigned order granting preliminary approval.                                                             | 0.20<br>400.00/hr | 80.00         |
|           | SML | Receive and review email from M. Moore to R. Zuniga, defense counsel re: unsigned order granting preliminary approval.                                       | 0.20<br>750.00/hr | 150.00        |
|           | DJ  | Factual research re: status of signed Second Amended Proposed Order; email to M. Moore and E. Nguyen re: same.                                               | 0.10<br>175.00/hr | 17.50         |

1/21/2022

|           |     |                                                                                                                                                                                                 | <u>Hrs/Rate</u>   | <u>Amount</u> |
|-----------|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 9/24/2021 | MLM | Correspondence with R. Zuniga, defense counsel re: unsigned order granting preliminary approval and draft email for court clerk.                                                                | 0.20<br>400.00/hr | 80.00         |
|           | ECN | Draft email to clerk from parties for defense counsel's approval re status of signed order on motion for preliminary approval.                                                                  | 0.30<br>650.00/hr | 195.00        |
|           | SML | Monitor email between M. Moore and R. Zuniga, defense counsel re: unsigned order granting preliminary approval and draft email for court clerk.                                                 | 0.20<br>750.00/hr | 150.00        |
|           | DJ  | Correspondence from M. Moore re: proposed follow-up email to clerk regarding status of signed Second Amended Proposed Order.                                                                    | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Communication to Court clerk re: status of signed Second Amended Proposed Order; factual research re: status of signed Second Amended Proposed Order; email to M. Moore and E. Nguyen re: same. | 0.20<br>175.00/hr | 35.00         |
| 9/29/2021 | MLM | Follow up email to R. Zuniga re: draft email to court clerk concerning order granting preliminary approval.                                                                                     | 0.10<br>400.00/hr | 40.00         |
|           | SML | Review M. Moore's follow up email to R. Zuniga re: draft email to court clerk concerning order granting preliminary approval.                                                                   | 0.10<br>750.00/hr | 75.00         |
|           | DJ  | Correspondence from M. Moore re: proposed follow-up email to clerk regarding status of signed Second Amended Proposed Order; email to Court clerk re: same.                                     | 0.20<br>175.00/hr | 35.00         |
| 9/30/2021 | MLM | Correspondence with R. Zuniga re: order granting preliminary approval and due date for class list to administrator.                                                                             | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Call with R. Zuniga, defense counsel, re: class data and the lack of phone numbers and positions held for the putative class members and email to E. Nguyen re: same.                           | 0.40<br>400.00/hr | 160.00        |
|           | SML | Review email between M. Moore R. Zuniga re: order granting preliminary approval and due date for class list to administrator.                                                                   | 0.20<br>750.00/hr | 150.00        |
|           | DJ  | Correspondence from Court clerk re: status of Second Amended Proposed Order and scheduling of hearing on Motion for Final Approval; update client file re: same.                                | 0.10<br>175.00/hr | 17.50         |
|           | DJ  | Factual research re: signed copy Second Amended Order.                                                                                                                                          | 0.10<br>175.00/hr | 17.50         |
| 10/1/2021 | MLM | Review court docket to determine if order granting preliminary approval had been entered.                                                                                                       | 0.20<br>400.00/hr | 80.00         |
|           | DJ  | Continue to conduct factual research re: signed copy Second Amended Order.                                                                                                                      | 0.10<br>175.00/hr | 17.50         |

1/21/2022

|            |     |                                                                                                                                                                                 | <u>Hrs/Rate</u>   | <u>Amount</u> |
|------------|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 10/4/2021  | DJ  | Continue to conduct further factual research re: signed copy Second Amended Order.                                                                                              | 0.10<br>175.00/hr | 17.50         |
| 10/5/2021  | MLM | Confer with D. Joudi and E. Nguyen re: unsigned order granting preliminary approval.                                                                                            | 0.20<br>400.00/hr | 80.00         |
|            | DJ  | Conduct follow up factual research re: signed copy Second Amended Order and telephone call to Court clerk re: same.                                                             | 0.10<br>175.00/hr | 17.50         |
| 10/7/2021  | DJ  | Continue to conduct follow up factual research re: signed copy Second Amended Order.                                                                                            | 0.10<br>175.00/hr | 17.50         |
| 10/8/2021  | MLM | Confer with D. Joudi and E. Nguyen re: notifying the administrator to prepare mailing process.                                                                                  | 0.20<br>400.00/hr | 80.00         |
|            | MLM | Email to J. Lawrence of Phoenix re: order granting preliminary approval and initiating mailing process for notice packets.                                                      | 0.30<br>400.00/hr | 120.00        |
|            | SML | Receive M. Moore's email to J. Lawrence of Phoenix re: order granting preliminary approval and initiating mailing process for notice packets.                                   | 0.20<br>750.00/hr | 150.00        |
|            | DJ  | Conduct follow up and factual research re: signed copy Second Amended Order.                                                                                                    | 0.10<br>175.00/hr | 17.50         |
| 10/12/2021 | MLM | Receive and review administrative timeline from E. Kruckenberg of Phoenix.                                                                                                      | 0.20<br>400.00/hr | 80.00         |
|            | SML | Receive and approve administrative timeline from E. Kruckenberg of Phoenix.                                                                                                     | 0.10<br>750.00/hr | 75.00         |
| 10/15/2021 | MLM | Email to settlement administrator with signed settlement agreement.                                                                                                             | 0.10<br>400.00/hr | 40.00         |
|            | MLM | Receive and review email from R. Zuniga, defense counsel, re: class data sent to Phoenix.                                                                                       | 0.10<br>400.00/hr | 40.00         |
|            | MLM | Review signed order granting preliminary approval and email to R. Zuniga, defense counsel, re: same.                                                                            | 0.20<br>400.00/hr | 80.00         |
|            | SML | Receive and review email from R. Zuniga, defense counsel, re: class data sent to Phoenix.                                                                                       | 0.10<br>750.00/hr | 75.00         |
|            | SML | Receive and review signed order granting preliminary approval.                                                                                                                  | 0.20<br>750.00/hr | 150.00        |
|            | DJ  | Correspondence from M. Moore re: obtaining signed Second Amended Order Granting Preliminary Approval of Class Action Settlement; factual research re: same; update client file. | 0.20<br>175.00/hr | 35.00         |

1/21/2022

|            |     |                                                                                                                                                                                                  | <u>Hrs/Rate</u>   | <u>Amount</u> |
|------------|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 10/15/2021 | DJ  | Submit Second Amended Order Granting Preliminary Approval to LWDA website; update client file re: same.                                                                                          | 0.20<br>175.00/hr | 35.00         |
| 10/25/2021 | MLM | Email to E. Kruckenberg of Phoenix re: status of mailing documents for the Parties' review and approval to comply with administrative timeline.                                                  | 0.10<br>400.00/hr | 40.00         |
|            | MLM | Email and call with R. Zuniga, defense counsel, re: Plaintiff's entitlement to preliminary calculations.                                                                                         | 0.40<br>400.00/hr | 160.00        |
|            | ECN | Follow up on status of mailing of notice of settlement.                                                                                                                                          | 0.10<br>650.00/hr | 65.00         |
|            | SML | Receive M. Moore's email to E. Kruckenberg of Phoenix re: status of mailing documents for the Parties' review and approval to comply with administrative timeline.                               | 0.10<br>750.00/hr | 75.00         |
| 10/26/2021 | MLM | Email to E. Kruckenberg of Phoenix re: status of mailing documents.                                                                                                                              | 0.10<br>400.00/hr | 40.00         |
|            | MLM | Correspondence with R. Zuniga, defense counsel, re: prior settlements with defense counsel and the circulation of preliminary calculations for the Parties' review and approval.                 | 0.20<br>400.00/hr | 80.00         |
|            | SML | Monitor emails to E. Kruckenberg of Phoenix re: status of mailing documents.                                                                                                                     | 0.10<br>750.00/hr | 75.00         |
|            | SML | Review M. Moore's email to E. Kruckenberg of Phoenix re: status of mailing documents.                                                                                                            | 0.10<br>750.00/hr | 75.00         |
|            | SML | Monitor emails between M. Moore and R. Zuniga, defense counsel, re: prior settlements with defense counsel and the circulation of preliminary calculations for the Parties' review and approval. | 0.20<br>750.00/hr | 150.00        |
| 10/27/2021 | MLM | Correspondence with E. Kruckenberg of Phoenix re: circulation of mailing documents and preliminary calculations.                                                                                 | 0.20<br>400.00/hr | 80.00         |
|            | MLM | Receive and review preliminary calculations.                                                                                                                                                     | 0.40<br>400.00/hr | 160.00        |
|            | SML | Monitor correspondence between M. Moore and E. Kruckenberg of Phoenix re: circulation of mailing documents and preliminary calculations.                                                         | 0.20<br>750.00/hr | 150.00        |
|            | SML | Receive and review preliminary calculations.                                                                                                                                                     | 0.30<br>750.00/hr | 225.00        |
| 10/28/2021 | MLM | Email to E. Kruckenberg of Phoenix re: approval of preliminary calculations and circulation to all Parties.                                                                                      | 0.10<br>400.00/hr | 40.00         |

1/21/2022

|            |     |                                                                                                                                        | <u>Hrs/Rate</u>   | <u>Amount</u> |
|------------|-----|----------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 10/28/2021 | MLM | Receive and review notice packet and email to E. Kruckenberg of Phoenix re: approval.                                                  | 0.70<br>400.00/hr | 280.00        |
|            | ECN | Monitor emails exchanged between R. Zuniga (defense counsel) and R. Kruckenberg (Settlement Administrator) re notice packet documents. | 0.20<br>650.00/hr | 130.00        |
|            | SML | Receive M. Moore's email to E. Kruckenberg of Phoenix re: approval of preliminary calculations and circulation to all Parties.         | 0.10<br>750.00/hr | 75.00         |
|            | SML | Monitor emails between M. Moore and E. Kruckenberg re: mailing of notice packets.                                                      | 0.20<br>750.00/hr | 150.00        |
|            | SML | Receive and review notice packet from E. Kruckenberg of Phoenix.                                                                       | 0.40<br>750.00/hr | 300.00        |
| 11/1/2021  | MLM | Email to E. Kruckenberg of Phoenix re: confirmation of mailing of notice packets to putative class members.                            | 0.10<br>400.00/hr | 40.00         |
|            | SML | Monitor emails between M. Moore and E. Kruckenberg of Phoenix re: confirmation of mailing of notice packets to putative class members. | 0.10<br>750.00/hr | 75.00         |
| 11/12/2021 | MLM | Review weekly correspondences from administrator Simpluris Inc re opt outs, disputes, objections to settlement.                        | 0.20<br>400.00/hr | 80.00         |
|            | SML | Review weekly correspondences from administrator Simpluris Inc re opt outs, disputes, objections to settlement.                        | 0.10<br>750.00/hr | 75.00         |
| 1/7/2022   | MLM | Correspondence with D. Joudi re costs to date in matter.                                                                               | 0.10<br>400.00/hr | 40.00         |
|            | MLM | Draft P. Haines declaration in support of motion of final approval.                                                                    | 0.30<br>400.00/hr | 120.00        |
|            | MLM | Draft client's declaration in support of motion for final approval.                                                                    | 0.40<br>400.00/hr | 160.00        |
|            | MLM | Draft S. Lidman declaration in support of Plaintiff's motion for final approval.                                                       | 0.40<br>400.00/hr | 160.00        |
|            | MLM | Review and revise administrator declaration in support of motion for final approval.                                                   | 0.40<br>400.00/hr | 160.00        |
|            | MLM | Draft E. Nguyen declaration in support of Plaintiff's motion for final approval.                                                       | 0.80<br>400.00/hr | 320.00        |
|            | MLM | Begin drafting memorandum of points and authorities in support of motion for final approval.                                           | 2.50<br>400.00/hr | 1,000.00      |

1/21/2022

|           |     |                                                                                                                                          | <u>Hrs/Rate</u>   | <u>Amount</u> |
|-----------|-----|------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|
| 1/7/2022  | ECN | Review TPA report re settlement administration.                                                                                          | 0.10<br>650.00/hr | 65.00         |
|           | SML | Confer with P. Haines and E. Nguyen re [REDACTED]<br>[REDACTED]                                                                          | 0.20<br>750.00/hr | 150.00        |
|           | DJ  | Factual research re: case administration for motion for final approval.                                                                  | 0.20<br>175.00/hr | 35.00         |
| 1/10/2022 | MLM | Draft my declaration in support of Plaintiff's motion for final approval.                                                                | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Draft proposed final judgment.                                                                                                           | 0.60<br>400.00/hr | 240.00        |
|           | MLM | Continue drafting memorandum of points and authorities in support of Plaintiff's motion for final approval.                              | 0.70<br>400.00/hr | 280.00        |
|           | MLM | Draft proposed order granting final approval.                                                                                            | 0.80<br>400.00/hr | 320.00        |
| 1/12/2022 | MLM | Continue to review case management order and draft summary of notice process section of MPA in support of motion for final approval.     | 1.30<br>400.00/hr | 520.00        |
| 1/13/2022 | MLM | Email correspondence with E. Nguyen re settlement administrator's declaration in support of motion for final approval and edits to same. | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Draft additions to MPA in support of motion for final approval based on case management order.                                           | 0.80<br>400.00/hr | 320.00        |
|           | DJ  | Continue factual research re: case administration for motion for final approval and email to M. Moore re: same.                          | 0.20<br>175.00/hr | 35.00         |
| 1/14/2022 | MLM | Correspondence with administrator, Phoenix re: draft declaration in support of motion for final approval.                                | 0.10<br>400.00/hr | 40.00         |
|           | MLM | Call with client to review declaration in support of motion for final approval.                                                          | 0.20<br>400.00/hr | 80.00         |
|           | MLM | Draft cost and lodestar information section of motion for final approval                                                                 | 1.10<br>400.00/hr | 440.00        |
|           | ECN | Review and revise proposed order on final approval and compare and contrast with requirements from CMO.                                  | 0.60<br>650.00/hr | 390.00        |
|           | ECN | Draft additions to third party administrator declaration in support of final approval and email to J. Lawrence re: same.                 | 1.10<br>650.00/hr | 715.00        |
|           | ECN | Revise motion for final approval.                                                                                                        | 1.40<br>650.00/hr | 910.00        |

1/21/2022

|                                           |     |                                                                                                                                        | <u>Hrs/Rate</u>   | <u>Amount</u>       |
|-------------------------------------------|-----|----------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------------|
| 1/14/2022                                 | SML | Receive and review my declaration in support of motion for final approval.                                                             | 0.30<br>750.00/hr | 225.00              |
|                                           | SML | Review points and authorities in support of motion for final approval.                                                                 | 1.50<br>750.00/hr | 1,125.00            |
| 1/18/2022                                 | MLM | Review and incorporate E. Nguyen's revisions to proposed judgment.                                                                     | 0.20<br>400.00/hr | 80.00               |
|                                           | MLM | Review and incorporate E. Nguyen's revisions to memorandum of points and authorities.                                                  | 0.50<br>400.00/hr | 200.00              |
| 1/19/2022                                 | MLM | Correspondence with administrator, Phoenix re: Plaintiff's edits to administrator declaration in support of motion for final approval. | 0.10<br>400.00/hr | 40.00               |
|                                           | MLM | Review and incorporate E. Nguyen's revisions to proposed order.                                                                        | 0.20<br>400.00/hr | 80.00               |
|                                           | MLM | Review and incorporate E. Nguyen's revisions to declarations in support of motion for final approval.                                  | 0.50<br>400.00/hr | 200.00              |
| 1/21/2022                                 | MLM | Final review of motion for final approval and supporting documents for filing.                                                         | 1.50<br>400.00/hr | 600.00              |
| <b>For professional services rendered</b> |     |                                                                                                                                        | <b>245.00</b>     | <b>\$114,295.00</b> |
| <b>Balance due</b>                        |     |                                                                                                                                        |                   | <b>\$114,295.00</b> |

# EXHIBIT D

to Declaration of Elizabeth Nguyen

EXHIBIT D

to Declaration of Elizabeth Nguyen

# LAFFEY MATRIX

[History](#)
[Case Law](#)
[See the Matrix](#)
[Contact us](#)
[Home](#)

|                  |                      |                            | Years Out of Law School * |       |       |       |       |
|------------------|----------------------|----------------------------|---------------------------|-------|-------|-------|-------|
| Year             | Adjustmt<br>Factor** | Paralegal/<br>Law<br>Clerk | 1-3                       | 4-7   | 8-10  | 11-19 | 20 +  |
| 6/01/21- 5/31/22 | 1.006053             | \$208                      | \$381                     | \$468 | \$676 | \$764 | \$919 |
| 6/01/20- 5/31/21 | 1.015894             | \$206                      | \$378                     | \$465 | \$672 | \$759 | \$914 |
| 6/01/19- 5/31/20 | 1.0049               | \$203                      | \$372                     | \$458 | \$661 | \$747 | \$899 |
| 6/01/18- 5/31/19 | 1.0350               | \$202                      | \$371                     | \$455 | \$658 | \$742 | \$894 |
| 6/01/17- 5/31/18 | 1.0463               | \$196                      | \$359                     | \$440 | \$636 | \$717 | \$864 |
| 6/01/16- 5/31/17 | 1.0369               | \$187                      | \$343                     | \$421 | \$608 | \$685 | \$826 |
| 6/01/15- 5/31/16 | 1.0089               | \$180                      | \$331                     | \$406 | \$586 | \$661 | \$796 |
| 6/01/14- 5/31/15 | 1.0235               | \$179                      | \$328                     | \$402 | \$581 | \$655 | \$789 |
| 6/01/13- 5/31/14 | 1.0244               | \$175                      | \$320                     | \$393 | \$567 | \$640 | \$771 |
| 6/01/12- 5/31/13 | 1.0258               | \$170                      | \$312                     | \$383 | \$554 | \$625 | \$753 |
| 6/01/11- 5/31/12 | 1.0352               | \$166                      | \$305                     | \$374 | \$540 | \$609 | \$734 |
| 6/01/10- 5/31/11 | 1.0337               | \$161                      | \$294                     | \$361 | \$522 | \$589 | \$709 |
| 6/01/09- 5/31/10 | 1.0220               | \$155                      | \$285                     | \$349 | \$505 | \$569 | \$686 |
| 6/01/08- 5/31/09 | 1.0399               | \$152                      | \$279                     | \$342 | \$494 | \$557 | \$671 |
| 6/01/07-5/31/08  | 1.0516               | \$146                      | \$268                     | \$329 | \$475 | \$536 | \$645 |
| 6/01/06-5/31/07  | 1.0256               | \$139                      | \$255                     | \$313 | \$452 | \$509 | \$614 |
| 6/1/05-5/31/06   | 1.0427               | \$136                      | \$249                     | \$305 | \$441 | \$497 | \$598 |
| 6/1/04-5/31/05   | 1.0455               | \$130                      | \$239                     | \$293 | \$423 | \$476 | \$574 |
| 6/1/03-6/1/04    | 1.0507               | \$124                      | \$228                     | \$280 | \$405 | \$456 | \$549 |
| 6/1/02-5/31/03   | 1.0727               | \$118                      | \$217                     | \$267 | \$385 | \$434 | \$522 |
| 6/1/01-5/31/02   | 1.0407               | \$110                      | \$203                     | \$249 | \$359 | \$404 | \$487 |
| 6/1/00-5/31/01   | 1.0529               | \$106                      | \$195                     | \$239 | \$345 | \$388 | \$468 |
| 6/1/99-5/31/00   | 1.0491               | \$101                      | \$185                     | \$227 | \$328 | \$369 | \$444 |
| 6/1/98-5/31/99   | 1.0439               | \$96                       | \$176                     | \$216 | \$312 | \$352 | \$424 |
| 6/1/97-5/31/98   | 1.0419               | \$92                       | \$169                     | \$207 | \$299 | \$337 | \$406 |
| 6/1/96-5/31/97   | 1.0396               | \$88                       | \$162                     | \$198 | \$287 | \$323 | \$389 |
| 6/1/95-5/31/96   | 1.032                | \$85                       | \$155                     | \$191 | \$276 | \$311 | \$375 |
| 6/1/94-5/31/95   | 1.0237               | \$82                       | \$151                     | \$185 | \$267 | \$301 | \$363 |

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69

(D.D.C. 2017)

\* “Years Out of Law School” is calculated from June 1 of each year, when most law students graduate. “1-3” includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). “4-7” applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier “1-3” from June 1, 1996 until May 31, 1999, would move into tier “4-7” on June 1, 1999, and tier “8-10” on June 1, 2003.

\*\* The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

# EXHIBIT E

to Declaration of Elizabeth Nguyen

# EXHIBIT E

to Declaration of Elizabeth Nguyen

**LIDMAN LAW, APC**

Scott M. Lidman (SBN 199433)  
slidman@lidmanlaw.com  
Elizabeth Nguyen (SBN 238571)  
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Milan Moore (SBN 308095)  
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Attorneys for Plaintiff  
ROSALBA RAMIREZ

**HAINES LAW GROUP, APC**

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2155 Campus Drive, Suite 180  
El Segundo, California 90245  
Tel: (424) 292-2350  
Fax: (424) 292-2355

Attorneys for Plaintiff  
ROSALBA RAMIREZ

**FILED**  
Superior Court of California  
County of Riverside

**4/26/2021**

**V. Lupercio**

Electronically Filed

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF RIVERSIDE**

ROSALBA RAMIREZ, as an individual and on  
behalf of all others similarly situated,

Plaintiff,

vs.

MOLDED DEVICES, INC., a California  
corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. RIC2001161

**SUPPLEMENTAL PROOF OF  
SERVICE RE: PLAINTIFF'S MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Date: ~~May 19, 2021~~ 7/07/2021

Time: 8:30 a.m.

Dept.: 1

**Confirmation No.: RES244965**

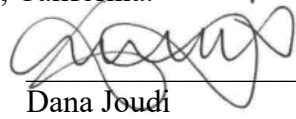
Complaint Filed: March 11, 2020

Trial Date: None Set



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

3 Executed on April 26, 2021, at El Segundo, California.

4   
Dana Joudi

**From:** [FormAssembly](#) on behalf of [DIR PAGA Unit](#)  
**To:** [Elizabeth.Nguyen](#)  
**Subject:** Thank you for your Proposed Settlement Submission  
**Date:** Monday, April 26, 2021 12:10:11 PM

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04/26/2021 12:09:46 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to [pagainfo@dir.ca.gov](mailto:pagainfo@dir.ca.gov).

DIR PAGA Unit on behalf of  
Labor and Workforce Development Agency

Website: [http://labor.ca.gov/Private\\_Attorneys\\_General\\_Act.htm](http://labor.ca.gov/Private_Attorneys_General_Act.htm)

# EXHIBIT F

to Declaration of Elizabeth Nguyen

EXHIBIT F  
to Declaration of Elizabeth Nguyen

**LIDMAN LAW, APC**

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slidman@lidmanlaw.com  
Elizabeth Nguyen (SBN 238571)  
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Milan Moore (SBN 308095)  
mmoore@lidmanlaw.com  
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ROSALBA RAMIREZ

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phaines@haineslawgroup.com  
2155 Campus Drive, Suite 180  
El Segundo, California 90245  
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Fax: (424) 292-2355

Attorneys for Plaintiff  
ROSALBA RAMIREZ

**FILED**

Superior Court of California  
County of Riverside

**8/18/2021**

**A. Fluker**

Electronically Filed

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF RIVERSIDE**

ROSALBA RAMIREZ, as an individual and on  
behalf of all others similarly situated,

Plaintiff,

vs.

MOLDED DEVICES, INC., a California  
corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. RIC2001161

**SUPPLEMENTAL PROOF OF  
SERVICE**

Complaint Filed: March 11, 2020  
Trial Date: None Set

**PROOF OF SERVICE**

STATE OF CALIFORNIA )  
 ) ss.  
COUNTY OF LOS ANGELES )

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 2155 Campus Drive, Suite 150, El Segundo, California 90245.

On August 18, 2021 I served the document(s) described as:

1. **PLAINTIFF'S SUPPLEMENTAL BRIEF IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF**
2. **SUPPLEMENTAL DECLARATION OF ELIZABETH NGUYEN IN SUPPORT OF PLAINTIFF'S SUPPLEMENTAL BRIEF ISO MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**
3. **SUPPLEMENTAL DECLARATION OF JODEY LAWRENCE OF PHOENIX CLASS ACTION ADMINISTRATION SOLUTIONS IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**
4. **[AMENDED PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

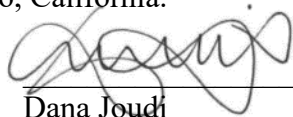
on the interested party(ies) in this action as follows:

Labor and Workforce Development Agency  
1515 Clay Street, Ste. 801  
Oakland, CA 94612  
<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

**(BY ELECTRONIC TRANSMISSION)** I caused a true and correct copy of the document(s) described above to be electronically transmitted to the Labor and Workforce Development Agency ("LWDA") by uploading them to the LWDA's online system under LWDA Case No. LWDA-CM-777851-20.

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

Executed on August 18, 2021 at El Segundo, California.

  
Dana Joudi

**From:** [FormAssembly](#) on behalf of [DIR PAGA Unit](#)  
**To:** [Dana Joudi](#)  
**Subject:** Thank you for your Other Response or Document Submission  
**Date:** Wednesday, August 18, 2021 11:14:45 AM

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08/18/2021 11:14:30 AM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Other Response or Document Submission

If you have questions or concerns regarding this submission or your case, please send an email to [pagainfo@dir.ca.gov](mailto:pagainfo@dir.ca.gov).

DIR PAGA Unit on behalf of  
Labor and Workforce Development Agency

Website: [http://labor.ca.gov/Private\\_Attorneys\\_General\\_Act.htm](http://labor.ca.gov/Private_Attorneys_General_Act.htm)

# EXHIBIT G

to Declaration of Elizabeth Nguyen

# EXHIBIT G

to Declaration of Elizabeth Nguyen

**LIDMAN LAW, APC**

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Milan Moore (SBN 308095)  
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Tel: (424) 322-4772  
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Attorneys for Plaintiff  
ROSALBA RAMIREZ

**HAINES LAW GROUP, APC**

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2155 Campus Drive, Suite 180  
El Segundo, California 90245  
Tel: (424) 292-2350  
Fax: (424) 292-2355

Attorneys for Plaintiff  
ROSALBA RAMIREZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF RIVERSIDE**

ROSALBA RAMIREZ, as an individual and on  
behalf of all others similarly situated,

Plaintiff,

vs.

MOLDED DEVICES, INC., a California  
corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. RIC2001161

**PROOF OF SERVICE RE: ORDER  
GRANTING PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Complaint Filed: March 11, 2020  
Trial Date: None Set

**PROOF OF SERVICE**

STATE OF CALIFORNIA )  
 ) ss.  
COUNTY OF LOS ANGELES )

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 2155 Campus Drive, Suite 150, El Segundo, California 90245.

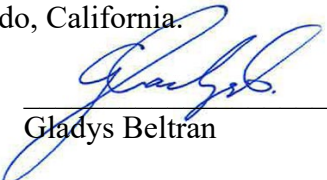
On October 15, 2021 I served the document(s) described as: **ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** on the interested party(ies) in this action as follows:

Labor and Workforce Development Agency  
1515 Clay Street, Ste. 801  
Oakland, CA 94612  
<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

**(BY ELECTRONIC TRANSMISSION)** I caused a true and correct copy of the document(s) described above to be electronically transmitted to the Labor and Workforce Development Agency ("LWDA") by uploading them to the LWDA's online system under LWDA Case No. LWDA-CM-777851-20.

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

Executed on January 21, 2022, at El Segundo, California.

  
Gladys Beltran

**From:** [FormAssembly](#) on behalf of [DIR PAGA Unit](#)  
**To:** [Gladys Beltran](#)  
**Subject:** Thank you for your Court Order or Judgment Submission  
**Date:** Friday, October 15, 2021 10:40:08 AM

---

10/15/2021 10:39:59 AM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Court Order or Judgment

If you have questions or concerns regarding this submission or your case, please send an email to [pagainfo@dir.ca.gov](mailto:pagainfo@dir.ca.gov).

DIR PAGA Unit on behalf of  
Labor and Workforce Development Agency

Website: [http://labor.ca.gov/Private\\_Attorneys\\_General\\_Act.htm](http://labor.ca.gov/Private_Attorneys_General_Act.htm)