

LIDMAN LAW, APC

Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Elizabeth Nguyen (SBN 238571)
enguyen@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
2155 Campus Drive, Suite 150
El Segundo, CA 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

Attorneys for Plaintiff
MY LE PHAM

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff
MY LE PHAM

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

MY LE PHAM, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

PLASMA RUGGEDIZED SOLUTIONS, INC.,
a Delaware corporation; and DOES 1 through
100,

Defendants.

Case No. 30-2019-01086573-CU-OE-CXC

*[Assigned for All Purposes to Hon. Peter Wilson,
Dept. CX102]*

**DECLARATION OF PAUL K. HAINES IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, CLASS
REPRESENTATIVE'S SERVICE AWARD,
AND ATTORNEYS' FEES AND COSTS**

Date: December 3, 2020
Time: 2:00 p.m.
Dept.: CX 102

Complaint Filed: July 30, 2019
Trial Date: None Set

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I, PAUL K. HAINES, declare as follows:

1. I am the principal of the law firm Haines Law Group, APC, and co-counsel for the named Plaintiff My Le Pham (“Plaintiff”) and the proposed Settlement Class in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I am a 2006 graduate of Pepperdine University School of Law, where I graduated *cum laude*. During law school, I worked as a law clerk for the appellate firm of Horvitz & Levy, located in Encino, California. I also spent a semester in law school working as an extern for the Honorable Edward Rafeedie, District Judge for the United States District Court for the Central District of California.

3. Since graduating from law school, my practice has focused exclusively on employment litigation. In September 2007, I began working as an associate attorney at the international law firm of Littler Mendelson P.C., at its Los Angeles office, which according to its website is the “largest U.S.-based law firm exclusively devoted to representing management in every aspect of labor and employment law.” While at Littler Mendelson, I was primarily staffed on wage and hour class actions venued in both state and federal courts, and I also worked on a number of single and multi-plaintiff wage and hour matters as well.

4. During my employment at Littler Mendelson, I played a significant role in the class actions that I was staffed on, as I was often the only associate staffed on such cases. In particular, I received a wide-array of wage and hour class action experience performing the following types of tasks: drafting demurrers, motions to strike and/or dismiss; removing actions from state court to federal court; drafting and responding to written discovery; drafting and opposing discovery related motions; arguing discovery related motions; drafting motions to consolidate related matters; interviewing putative class members and obtaining declarations in connection with class certification; drafting oppositions to motions for class certification; drafting motions for decertification following class certification; conducting exposure analyses to assess the strengths and weaknesses of asserted claims,

1 the likelihood of prevailing at class certification and potential damages resulting from such claims;
2 drafting mediation briefs; serving as the primary contact to in-house counsel; deposing named
3 plaintiffs and putative class members; deposing retained expert witnesses; and defending the
4 depositions of corporate witnesses. In short, I played an integral role in all aspects of litigation from
5 the inception of a matter through and beyond class certification. I also supervised the work of several
6 junior attorneys who were staffed on the same wage and hour class actions.

7 5. In June 2011, I voluntarily resigned from Littler Mendelson in order to accept an
8 associate attorney position with the international law firm of Morgan, Lewis & Bockius LLP, at its
9 Los Angeles office, where I began working in July 2011. During my employment at Morgan, Lewis
10 & Bockius LLP, I worked exclusively on the defense of wage and hour class and collective actions.
11 For the vast majority of these cases, I was the only associate staffed on the matter, and I performed
12 the same job duties as described in the immediately preceding paragraph. In addition to working on
13 wage and hour class actions, at Morgan, Lewis & Bockius I also worked on a number of “hybrid”
14 actions asserting nationwide wage and hour claims under the Fair Labor Standards Act (“FLSA”), as
15 well as California-specific claims under Rule 23 of the Rules of Civil Procedure.

16 6. In July 2012, I transitioned into litigating wage and hour class actions from the
17 Plaintiff’s side, first as a Partner with the law firm of Boren, Osher & Luftman, LLP, and since
18 February 2016, as a Shareholder of the Haines Law Group, APC. Currently, over ninety percent (90%)
19 of my practice is dedicated exclusively to the prosecution of wage and hour class actions, and I am
20 currently responsible for prosecuting over thirty (30) wage and hour class actions filed in both State
21 and Federal courts throughout California. Below are some of the matters in which I have been
22 appointed as Class Counsel, all of which have been granted final approval: *Hilberger v. Eisenhower*
23 *Medical Center*, Case No. INC1204915, California Superior Court, County of Riverside, Honorable
24 Judge John G. Evans, presiding, (in which I was approved for an hourly rate of \$500 for work
25 performed in 2012 and 2013); *Lopez v. Cornucopia Tools and Plastics, Inc.*, Case No. CV138049,
26 California Superior Court, County of San Luis Obispo, Honorable Judge Martin J. Tangeman,
27 presiding, (in which I was approved for an hourly rate of \$425 for work performed in 2013 and 2014);
28 *Tacker v. Compass Health, Inc.*, Case No. CV13-02261 BRO (JCG), United States District Court,

1 Central District of California, Honorable Judge Beverly Reid O’Connell, presiding, (in which I was
2 approved for an hourly rate of \$500 for work performed in 2013 and 2014); *Noell v. American*
3 *Professional Ambulance Corporation, Inc.*, Case No. BC499345, California Superior Court, County
4 of Los Angeles, Honorable Judge Kenneth R. Freeman, presiding, (in which I was approved for an
5 hourly rate of \$500 for work performed in 2013 and 2014); *Bautista v. Harvest Management Sub LLC*,
6 Case No. CV12-10004 FMO (CWx), United States District Court, Central District of California,
7 Honorable Judge Fernando M. Olguin, presiding (in which I was approved for an hourly rate of \$500
8 for work performed in 2012, 2013 and 2014); *Davila v. OCB Restaurant Co.*, Case No. CV13-5403
9 PA (JCG), United States District Court, Central District of California, Honorable Judge Percy
10 Anderson, presiding (in which I was approved for an hourly rate of \$500 for work performed in 2013
11 and 2014); *Abad v. Waste Connections, Inc.*, Case No. CV12-06708 DDP (PJWx), United States
12 District Court, Central District of California, Honorable Judge Dean D. Pregerson, presiding (in which
13 I was approved for an hourly rate of \$500 for work performed in 2013 and 2014); *Plantillas v. Snap-*
14 *On Incorporated*, Case No. CV13-05153 DDP (VBKx), United States District Court, Central District
15 of California, Honorable Judge Dean D. Pregerson, presiding (in which I was approved for an hourly
16 rate of \$500 for work performed in 2013 and 2014); *Theodore v. Keyes European, LLC*, Case No.
17 BC521395, California Superior Court, County of Los Angeles, Honorable Judge Elihu Berle,
18 presiding (in which I was approved for an hourly rate of \$500 for work performed in 2013 and 2014);
19 *Morales v. Sunset Tower Hotel LLC*, Case No. BC511924, California Superior Court, County of Los
20 Angeles, Honorable Judge John Shepard Wiley Jr., presiding (in which I was approved for an hourly
21 rate of \$500 for work performed in 2013 and 2014); *Gonzalez v. Universal Alloy Corp.*, Case No.
22 SACV13-00807 JVS (MRWx), United States District Court, Central District of California, Honorable
23 Judge James V. Selna, presiding (in which I was approved for an hourly rate of \$500 for work
24 performed in 2013 and 2014); *Morawski v. Milt Guggia Enterprises, Inc.*, Case No. CV13-2349 ABC
25 (RZx), United States District Court, Central District of California, Honorable Judge Andre Birotte, Jr.,
26 presiding (in which I was approved for an hourly rate of \$500 for work performed in 2013 and 2014);
27 *Thorp v. Alcal Industries, Inc., et al.*, Case No. CV13-02289 YGR, United States District Court,
28 Northern District of California, Honorable Judge Yvonne Gonzalez Rogers, presiding (in which I was

1 approved for an hourly rate of \$500 for work performed in 2013 and 2014); *Myles v. College Hospital*,
2 Case No. BC487206, California Superior Court, County of Los Angeles, Honorable Judge John
3 Shepard Wiley, Jr., presiding (in which I was approved for an hourly rate of \$500 for work performed
4 in 2013, 2014 and 2015); *Sarinana v. DS Waters of America, Inc.*, Case No. C13-0905 EMC, United
5 States District Court, Northern District of California, Honorable Edward M. Chen, presiding (in which
6 I was approved for an hourly rate of \$550 for work performed in 2014 and 2015); *Julio v. Anthony*,
7 *Inc.*, Case No. CV14-03172 AB (SHx), United States District Court, Central District of California,
8 Honorable Judge Andre Birotte Jr., presiding (in which I was approved for an hourly rate of \$550 for
9 work performed in 2014 and 2015); *Litt v. Western Stone & Metal Corp.*, Case No. 3:14-cv-02804-
10 PJH, United States District Court, Northern District of California, Honorable Judge Phyllis J.
11 Hamilton, presiding (in which I was approved for an hourly rate of \$550 for work performed in 2014
12 and 2015); *Rubalcava v. United Towing and Transport Burbank, et al.*, Case No. BC518468,
13 California Superior Court, County of Los Angeles, Honorable Judge Kenneth Freeman, presiding (in
14 which I was approved for an hourly rate of \$550 for work performed in 2013, 2014 and 2015); *Sanchez*
15 *v. Res-Care, Inc.*, Case No. BC526175, California Superior Court, County of Los Angeles, Honorable
16 John S. Wiley, presiding (in which I was approved for an hourly rate of \$550 for work performed in
17 2013, 2014 and 2015); *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex),
18 United States District Court, Central District of California, Honorable Judge John F. Walter, presiding
19 (in which I was approved for an hourly rate of \$550 for work performed in 2014 and 2015); *Rivera*
20 *Regalado v. Jaguar Farm Labor Contracting*, Case No. CV 130569, California Superior Court,
21 County of San Luis Obispo, Honorable Martin J. Tangeman, presiding (in which I was approved for
22 an hourly rate of \$550 for work performed in 2014 and 2015); *Rodas v. Gateways Hospital and Mental*
23 *Health Center*, Case No. BC503179, California Superior Court, County of Los Angeles, Honorable
24 Judge Amy D. Hogue, presiding (in which I was approved for an hourly rate of \$550 for work
25 performed in 2014 and 2015); *Escobar v. Century West, LLC*, Case No BC564873, California Superior
26 Court, County of Los Angeles, Honorable Judge Jane L. Johnson, presiding (in which I was approved
27 for an hourly rate of \$550 for work performed in 2014 and 2015 and 2016); *Shaw v. Conant Auto*
28 *Retail, San Diego*, Case No. 37-2014-00044052-CU-OE-CTL, California Superior Court, County of

San Diego, Honorable Judge Joan M. Lewis, presiding (approving an hourly rate of \$575 for work performed in 2014, 2015, and 2016); *Tirado v. Ricon Corp.*, Case No. BC537042, California Superior Court, County of Los Angeles, Honorable John S. Wiley, presiding (approving an hourly rate of \$575 for work performed in 2014, 2015, and 2016); and *Horta v. Searles Valley Minerals, Inc.*, Case No. CIVDS 1507615, California Superior Court, County of San Bernardino, Honorable Donald Alvarez presiding (approving an hourly rate of \$575 for work performed in 2015 and 2016); *Cristobal v. Koos Manufacturing, Inc.*, Case No. BC591484, California Superior Court, County of Los Angeles, Hon. William F. Highberger presiding (approving an hourly rate of \$575 for work performed in 2015 and 2016); *Rodriguez v. Spartan, Inc.*, Case No. BCV-15-100007-DRL, California Superior Court, County of Kern, Honorable David R. Lampe presiding (approving hourly rate of \$575 for work performed in 2015, 2016, and 2017); *Kostyuk, et al. v. Golden State Overnight Delivery Service, Inc.*, Case No. RG14727191, California Superior Court, Alameda County, Honorable Winifred Y. Smith presiding (approving an hourly rate of \$575 for work performed in 2015, 2016, and 2017); *Nunez v. CompuCom Systems, Inc.*, Case No. BC618385, California Superior Court, County of Los Angeles, Honorable Judge John Shepard Wiley, Jr., presiding (approved at an hourly rate of \$600 for work performed in 2016 and 2017); *Mansilla v. Haeco Americas Line Services, LLC, et al*, Case No. BC615310, Superior Court of California, County of Los Angeles, Honorable Judge Elihu M. Berle presiding (approved at an hourly rate of \$600 for work performed in 2016 and 2017); *Morales v. Caremeridian, LLC, et al.*, Case No. BC593191, California Superior Court, County of Los Angeles, Judge William F. Highberger presiding (granting final approval of settlement on behalf of direct support professionals involving claims for unpaid wages, meal and rest period violations, wage statement violations, and other claims).

7. I have also moved to certify and have received an order certifying a class action and/or conditionally certifying a collective action, in the following cases:

- *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge Gail A. Andler, presiding (certifying a class of employees who were misclassified as independent contractors);

- 1 • *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx), United States
2 District Court, Central District of California, Honorable Judge Beverly Reid O’Connell,
3 presiding (conditionally certifying an unpaid FLSA overtime wage class);
- 4 • *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States District
5 Court, Central District of California, Honorable Judge John F. Walter, presiding (certifying a
6 rest period violation class and conditionally certifying an FLSA unpaid overtime wage class);
- 7 • *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District Court, Northern
8 District of California, Honorable Judge Haywood S. Gilliam, Jr., presiding (conditionally
9 certifying an unpaid FLSA overtime wage class);
- 10 • *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT, United States
11 District Court, Eastern District of California, Honorable Jennifer L. Thurston, presiding
12 (conditionally certifying an unpaid FLSA overtime wage class);
- 13 • *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC,
14 California Superior Court, County of Orange, Honorable Judge William Claster, presiding
15 (certifying unpaid overtime wage class and waiting time penalty class); and
- 16 • *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx), United States
17 District Court, Central District of California, Honorable Dolly M. Gee presiding (certifying six
18 classes of employees for rest period violations, wage statement violations, meal period
19 violations, and overtime and double-time violations);
- 20 • *Vazquez, et al v. Kraft Heinz Foods Company*, Case No. 16-cv-2749-WQH-BLM, United States
21 District Court, Southern District of California, Honorable William Q. Hayes presiding
22 (certifying six classes of employees for unpaid wages, meal period violations, wage statement
23 violations, and waiting time penalties); and
- 24 • *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-06874-WHA,
25 United States District Court, Northern District of California, Honorable William H. Alsup
26 presiding (certifying three classes of employees for unlawful wage deduction violations, wage
27 statement violations, and waiting time violations).

1 8. In 2015, 2016 and 2017, Thomson Reuters and Los Angeles Magazine recognized me
2 as a Top Young Attorney in Southern California in the annual Rising Star Edition of Super Lawyer.
3 This is an honor awarded to no more than two and a half percent of attorneys under the age of forty in
4 Southern California each year. In 2018 and 2019 Thomson Reuters recognized me as a “Super
5 Lawyer” in the annual Super Lawyer magazine, an honor awarded to no more than five percent of all
6 attorneys in Southern California each year.

7 9. In addition to myself, the other attorney at my law firm who worked on this matter also
8 has significant experience in wage and hour class action litigation. Sean Blakely, Esq., has been
9 appointed class counsel in over collectively over 75 class actions, in addition to being appointed class
10 counsel in several contested motions for class certification. Mr. Blakely is a 2008 graduate of
11 Southwestern Law School, has been with my firm since November 2016 and is currently staffed on
12 over approximately 40 wage and hour class actions in both state and federal court. In 2018 and 2019,
13 Mr. Blakely was recognized by Thomson Reuters and Los Angeles Magazine as a Top Young Attorney
14 in Southern California in the annual Rising Star Edition of Super Lawyer.

15 10. As co-counsel for Plaintiff and the proposed Settlement Class, I have been intimately
16 involved in this case from its inception through the present, and believe that the proposed Settlement
17 is an excellent result for the Settlement Class.

18 11. The details of the work completed by my firm are attached hereto as **Exhibit B** and
19 the details of the work completed by my co-counsel are set forth in Exhibit C attached in the
20 declaration of Elizabeth Nguyen filed concurrently herewith.

21 12. Since undertaking representation of Plaintiff, my firm has borne the costs of litigation
22 for over a year without receiving any compensation to date. To date, my firm and/or co-counsel’s firm
23 have incurred \$22,718.53 in out-of-pocket costs reasonably incurred in litigating this matter, which
24 includes anticipated costs of \$179 for filing fees, service and messenger fees, expenses for future court
25 appearances, and/or postage. Attached hereto as **Exhibit A** is an Expense Summary reflecting these
26 costs, which include but are not limited to: filing fees, attorney service fees, court reporter fees,
27 messenger fees, service fees, copying costs, mediation fees, postage. The itemized costs are also
28 identified in **Exhibit B** attached hereto.

13. Attached hereto as **Exhibit B** is a true and correct copy of a report all attorney time billed to this matter by my firm since undertaking this case in July 2019. The report is partially redacted to protect attorney-client communications and attorney work product. The lodestar for my firm is \$12,805.00. A general summary showing the number of hours of work performed by me.

Name	Billing Initials	Rate	Hours	Pre-Multiplier Lodestar
Paul K. Haines (14th Year Attorney)	PKH	\$650	15.3	\$9,945.00
Sean Blakely (11th Year Attorney)	SMB	\$550	5.2	\$2,860.00
Total Lodestar				\$12,805.00

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct. Executed on November 6, 2020 at El Segundo, California.



Paul K. Haines

EXHIBIT A

EXHIBIT A

Lidman Law, APC and Haines Law Group, APC

Expense Summary

My Le Pham v. Plasma Ruggedized Solutions, Inc.

EXPENSE	AMOUNT
Mediation Costs	\$6,485.00
Expert Fees	\$13,756.50
Filing, Service, and Messenger Fees	\$2,114.49
Copying	\$88.50
Postage	\$38.27
Travel Expenses	\$52.87
Legal Research	\$3.90
Anticipated costs for filing fees, service and messenger fees, expenses for future court appearances, and/or postage	\$179.00
TOTAL:	\$22,718.53

EXHIBIT B

EXHIBIT B

HAINES LAW GROUP
EMPLOYMENT ATTORNEYS

November 6, 2020

Invoice submitted to:
Pham My Le

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
1/11/2019	PKH Telephone call with [REDACTED]	0.40 650.00/hr	260.00
	PKH Review client documents, including wage statements to identify potential legal issues and claims.	0.60 650.00/hr	390.00
1/14/2019	SMB Meet with potential new client [REDACTED]	5.20 550.00/hr	2,860.00
2/3/2019	PKH Meet [REDACTED]	0.50 650.00/hr	325.00
7/29/2019	PKH Review draft of complaint.	0.40 650.00/hr	260.00
7/30/2019	PKH Confer with S. Lidman and E. Nguyen [REDACTED]	0.30 650.00/hr	195.00
11/5/2019	PKH Confer with S. Lidman re [REDACTED]	0.40 650.00/hr	260.00
11/6/2019	PKH Analysis of [REDACTED]	0.30 650.00/hr	195.00
1/22/2020	PKH Confer with S. Lidman and E. Nguyen [REDACTED]	0.30 650.00/hr	195.00
1/24/2020	PKH Strategy meeting with S. Lidman and E. Nguyen [REDACTED]	0.30 650.00/hr	195.00
1/28/2020	PKH Analysis of claims with S. Lidman and E. Nguyen [REDACTED]	0.30 650.00/hr	195.00

11/6/2020

		<u>Hrs/Rate</u>	<u>Amount</u>
2/4/2020	PKH Correspondence with [REDACTED]	0.30 650.00/hr	195.00
2/11/2020	PKH Receive and review mediation brief and economist's analysis of potential exposure for Defendant.	1.10 650.00/hr	715.00
2/13/2020	PKH Plan and prepare for mediation with S. Lidman.	0.60 650.00/hr	390.00
	PKH Receive and review Defendant's mediation brief.	1.00 650.00/hr	650.00
2/19/2020	PKH Confer with S. Lidman [REDACTED]	0.20 650.00/hr	130.00
2/20/2020	PKH Continue to strategize with [REDACTED]	0.70 650.00/hr	455.00
2/21/2020	PKH Confer with S. Lidman [REDACTED]	0.60 650.00/hr	390.00
2/24/2020	PKH Confer with S. Lidman [REDACTED]	0.30 650.00/hr	195.00
2/25/2020	PKH Continue to confer with S. Lidman [REDACTED]	0.20 650.00/hr	130.00
3/19/2020	PKH Confer with SML [REDACTED]	0.30 650.00/hr	195.00
3/25/2020	PKH Review and revise PKH declaration in support of motion for preliminary approval.	0.40 650.00/hr	260.00
	PKH Confer with [REDACTED]	1.20 650.00/hr	780.00
3/26/2020	PKH Review draft motion for preliminary approval and supporting documents.	1.40 650.00/hr	910.00
3/27/2020	PKH Continue to confer with [REDACTED]	0.80 650.00/hr	520.00
7/23/2020	PKH Receive and review the Court's tentative ruling on motion for preliminary approval.	0.30 650.00/hr	195.00
7/24/2020	PKH Review drafts of amended documents for class notice packets.	0.50 650.00/hr	325.00
10/30/2020	PKH Receive and review weekly report from Phoenix.	0.10 650.00/hr	65.00

11/6/2020

			<u>Hrs/Rate</u>	<u>Amount</u>
10/30/2020	PKH	Confer with S. Lidman [REDACTED] [REDACTED]	0.60 650.00/hr	390.00
11/4/2020	PKH	Review and approve PKH declaration in support of motion for final approval.	0.30 650.00/hr	195.00
	PKH	Review draft of points and authorities in support of motion for final approval.	0.60 650.00/hr	390.00
For professional services rendered			20.50	\$12,805.00
Additional Charges :				
			<u>Qty/Price</u>	
1/14/2019	SMB	Parking at intake.	1 15.00	15.00
	SMB	Mileage to/from intake.	1 37.87	37.87
1/31/2019	PKH	Postage for January, 2019.	1 6.67	6.67
	PKH	Copying cost for January, 2019.	6 0.25	1.50
7/30/2019	PKH	Jury Fees.	1 150.00	150.00
	PKH	Initial and Complex Case filing fees and One Legal's service fee for filing of Summons & Complaint.	1 1,499.51	1,499.51
10/11/2019	PKH	First Legal's service fee for service on Plasma Ruggedized Solutions, Inc.	1 132.78	132.78
10/31/2019	PKH	Postage for October, 2019.	1 0.65	0.65
	PKH	Copying cost for October, 2019.	6 0.25	1.50
11/30/2019	PKH	Copying cost for November, 2019.	2 0.25	0.50
1/8/2020	PKH	Signature Resolution mediation fee - Invoice #9818 (2/21/20 mediation)	1 6,450.00	6,450.00
	PKH	FedEx	1 15.25	15.25

11/6/2020

		<u>Qty/Price</u>	<u>Amount</u>
1/31/2020	PKH Expert fee for Economist Inc. - Inv. #26514	1 5,955.50	5,955.50
	PKH Copying cost for January, 2020.	1 0.25	0.25
2/21/2020	PKH Parking at mediation (SML)	1 35.00	35.00
2/25/2020	PKH Filing fee for Joint Notice of Class Action Recommended Settlement and Stipulation to 1) Vacate February 28, 2020 Status Conference; 2) Set Deadline to file MPA and 3) Set Hearing Date for MPA and Proposed Order. One Legal's service fee for filing of the same.	1 33.86	33.86
2/29/2020	PKH Postage for February, 2020.	1 0.65	0.65
	PKH Economists Inc. expert fee for Invoice #26618	1 6,436.00	6,436.00
	PKH Copying cost for February, 2020.	110 0.25	27.50
3/10/2020	PKH LWDA Filing fee.	1 75.00	75.00
3/22/2020	PKH Keith D. Messerschmidt expert fee	1 1,365.00	1,365.00
3/31/2020	PKH Westlaw cost for March, 2020.	1 3.90	3.90
	PKH Postage for March, 2020.	1 14.10	14.10
	PKH Copying cost for MARCH, 2020.	4 0.25	1.00
	PKH Copying cost for MARCH, 2020.	205 0.25	51.25
5/29/2020	PKH One Legal's fee for filing of Decl in Support	1 75.18	75.18
5/31/2020	PKH CourtCall fee for hearing on 7/23/2020	1 54.00	54.00
6/5/2020	PKH One Legal's fee for filing of Proposed Stip and Order	1 33.86	33.86
6/11/2020	PKH One Legal's fee for filing of Notice of Change of Address	1 13.20	13.20

11/6/2020

		<u>Qty/Price</u>	<u>Amount</u>
6/11/2020	PKH One Legal's fee for filing of Notice of Change of Address	1 13.20	13.20
7/23/2020	PKH Fee for purchasing minute order from Court's website.	1 7.50	7.50
7/24/2020	PKH One Legal's fee for filing of Notice of Ruling - Complex	1 13.20	13.20
7/27/2020	PKH One Legal's fee for filing of Proof of Service	1 13.20	13.20
8/31/2020	PKH Postage for August, 2020.	1 0.95	0.95
	PKH Copying cost for August, 2020.	20 0.25	5.00
Total additional charges			<u>\$22,539.53</u>
Total amount of this bill			<u>\$35,344.53</u>
Balance due			<u><u>\$35,344.53</u></u>