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Attorneys for Plaintiffs
RUBEN ALVARADO and
WHITEY DAVIS

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

RUBEN ALVARADO, individually, and on
behalf of other members of the general public
similarly situated; WHITEY DAVIS,
individually, and on behalf of other members
of the general public similarly situated and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiffs,

vs.

CITADEL SERVICING CORPORATION, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 30-2019-01057617-CU-OE-CXC

*Assigned for All Purposes to: Hon. Lon F.
Hurtwitz, Dept. CX-103*

**DECLARATION OF HEATHER DAVIS
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: June 2, 2023
Hearing Time: 1:30 p.m.
Dept: CX103

Complaint Filed: March 18, 2019
Trial Date: None Set

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DECLARATION OF HEATHER DAVIS, ESQ.

I, Heather Davis, declare as follows:

1. I am an attorney duly licensed to practice law before all courts of the State of California and all United States District Courts in the State of California. I am a Partner of the Protection Law Group, LLP, and attorney of record for named Plaintiffs RUBEN ALVARADO and WHITEY DAVIS (collectively "Plaintiffs") in this Action against Defendant CITADEL SERVICING CORPORATION ("Defendant"). I have personal knowledge of the facts stated herein and if called as a witness I could and would competently testify thereto.

CLASS COUNSEL'S BACKGROUND AND EXPERIENCE

2. I am a duly licensed attorney and have been a member of the Colorado State Bar since 1998, the California State Bar since 2005, and the Arizona State Bar since 2007. I graduated from the University of Denver School of Law in 1998, and I am licensed to practice before all courts of the State of California and Colorado as well as the State of Arizona and District Courts throughout the country.

3. Prior to opening my law firm, I developed particular experience in the area of wage and hour litigation. For instance, between 2007 and 2013, I joined the law firm of Littler Mendelson, P.C., the largest labor and employment law firm in the United States.

4. During my employment with Littler Mendelson, P.C., I continued my practice of employment law and was responsible for and defended dozens of complex class actions, including some of the largest representative and class actions brought under the California Labor Code, including meal and rest break violations, overtime, minimum wage claims, off-the-clock work and other related wage claims. My practice included the management of dozens of class actions. My management of these cases included taking and defending hundreds of depositions and interviews of hundreds of putative class members, as well as extensive state, federal and appellate briefing on hundreds of wage and hour issues involving class actions.

5. During my employment at Littler Mendelson, I played a significant role in the class actions for which I was responsible. In particular, I was often in charge of leading the strategy of the cases and drafting all of the briefs. I received a wide-array of wage and hour

1 class action experience performing the following types of tasks: drafting demurrers; motions to
2 strike and/or dismiss; removing actions from state court to federal court; drafting and
3 responding to written discovery; drafting and opposing discovery related motions; arguing
4 discovery related motions; drafting motions to consolidate related matters; interviewing putative
5 class members and obtaining declarations in connection with class certification; drafting
6 oppositions to motions for class certification; drafting motions for decertification following
7 class certification; conducting exposure analyses to assess the strengths and weaknesses of
8 asserted claims, the likelihood of prevailing at class certification and potential damages
9 resulting from such claims; drafting mediation briefs; serving as the primary contact to in-house
10 counsel; deposing plaintiffs and putative class members; deposing retained expert witnesses;
11 and defending the depositions of corporate witnesses. In short, I played an integral role in all
12 aspects of litigation from the inception of a matter through and beyond class certification.

13 6. During my practice in other jurisdictions and continuing today, I have been
14 primarily devoted to working in employment law and on complex class action and
15 representative litigation and multi-plaintiff work.

16 7. Protection Law Group, LLP is a law firm specifically devoted to the
17 representation of employees against employers in California involving claims relating to
18 violations of the California Labor Code, including claims for failure to pay all wages owed,
19 failure to pay overtime premiums, failure to pay meal and rest premiums and failure to provide
20 accurate wage records. The practice of employment law is a very specific, narrow field which
21 requires diligence in an ever-evolving field of substantive and procedural law.

22 8. Although not exhaustive, below is a representative list of several of the wage and
23 hour class actions that I performed substantial work on while I was an attorney with Littler
24 Mendelson, including, but not limited to: *Villacres v. ABM Industries, Inc.*, 189 Cal.App.4th
25 562 (2010); *Brizuela v. Copart, Inc.*, CIVRS11101592, (San Bernardino Superior Court class
26 action settlement); *Augustus v. ABM Industries, Inc.*, BC336416, 2 Cal. 5th 257 (2016); *Tagaki*
27 *v. United Airlines*, 2:11-CV9191 (Central District class action settlement); *Babasa v. Comerica,*
28 *Inc.*, 3:11-CV00595; *Leyva v. Medline Industries, Inc.* 5:11-cv-00164 (Central District); *Blue v.*

1 *Coldwell Banker Residential Brokerage Co.*, BC417335, (Los Angeles Superior Court, class
2 action settlement); and *Acosta v. Texwood Industries, Inc.*, 2:07-cv-03237-DDP-PLA (Central
3 District class action settlement).

4 9. Since opening my firm, I have served as lead counsel or co-class counsel in
5 several wage and hour class and/or representative actions seeking wages and penalties owed on
6 behalf of employees for which final approval of the settlement or class certification has been
7 granted, including, but not limited to the following:

- 8 • *Holzer v. Wedbush Securities, Inc.*, BC550462 (Los Angeles Superior Court
9 wage and hour class action certifying class of independent contractors and
10 appointing Protection Law Group, LLP as class counsel);
- 11 • *White v. Windy Pizza Plus, LLC*, BC593377 (Los Angeles Superior Court
12 wage and hour class action certifying class of all non-exempt employees and
13 appointing Protection Law Group, LLP as class counsel);
- 14 • *Morera v. Continental Asset Mgmt.*, BC502003 (Los Angeles Superior Court
15 wage and hour class action appointing Protection Law Group, LLP as class
16 counsel in settlement);
- 17 • *Fong et al. v. Regis Corporation*, 3:13-cv-13-04497 VC, (United States
18 District Court, Northern District of California, wage and hour class action
19 settlement and appointment Protection Law Group, LLP as class counsel in
20 settlement);
- 21 • *Espinoza v. Financial Partners Credit Union*, BC502165 (Los Angeles
22 Superior Court wage and hour Class Action appointing Protection Law Group,
23 LLP as class counsel in settlement);
- 24 • *Kesheshian, et al v. S. Cal. Logistics*, BC557981 (Los Angeles Superior Court
25 wage and hour class action appointing Protection law Group, LLP as class
26 counsel in settlement);
- 27 • *Sampson v. 24 HR Homecare LLC*, BC586019 (Los Angeles County Superior
28 Court wage and hour class action);

- 1 • *Glenn v. Decron Properties Corp.*, BCC 578035 (Los Angeles Superior Court
2 wage and hour class action appointing Protection Law Group, LLP as class
3 counsel in settlement);
- 4 • *Torres v. Auto Rescue et al.*, RIC1509900 (Riverside County Superior Court
5 wage and hour class action appointing Protection Law Group, LLP as class
6 counsel in settlement);
- 7 • *Kashanian v. Plus Labs, Inc.*, 2016-1-CV-294231 (Santa Clara County
8 Superior Court wage and hour class action appointing Protection Law Group,
9 LLP as class counsel in settlement);
- 10 • *Cadena v. Tetra Property Management*, 257425 (Tulare County Superior
11 Court wage and hour class action appointing Protection law Group, LLP as
12 class counsel in settlement);
- 13 • *Drayton v. Hollywood Park Casino*, BC593935 (Los Angeles Superior Court
14 wage and hour class action appointing Protection Law Group, LLP as class
15 counsel in settlement);
- 16 • *Khan v. FPI Management, Inc.*, JCCP4819 (Los Angeles Superior Court wage
17 and hour class action appointing Protection Law Group, LLP as class counsel
18 in settlement);
- 19 • *Byrd v. Masonite Corp.*, 5:16-cv-00035-JGBKK (United States District Court,
20 Central District of California appointing Protection Law Group, LLP as class
21 counsel in settlement);
- 22 • *Hadrick v. Woodmont Real Estate Serv., et al.*, CIV 530405 (San Mateo
23 County Superior Court wage and hour class action appointing Protection Law
24 Group, LLP as class counsel in settlement);
- 25 • *Utterbach v. Daylight Transport, LLC et al.*, BC600994 (Los Angeles
26 Superior Court wage and hour class action appointing Protection Law Group,
27 LLP as class counsel in settlement);
- 28 • *Lemus v. Slater Inc.*, CIVDS1703633 (San Bernardino Superior Court wage

1 and hour class action appointing Protection Law Group, LLP as class counsel
2 in settlement);

- 3 • *Deluna v. Amerit Fleet Solutions et al.*, CIVDS1721564 (San Bernardino
4 Superior Court wage and hour class action appointing Protection Law Group,
5 LLP as class counsel in settlement);
- 6 • *Stone v. Universal Protection Services*, AAA Case No. 01-15-0002-7497
7 (American Arbitration Association wage and hour class action appointing
8 Protection Law Group, LLP as class counsel in settlement);
- 9 • *Commick v. Prometheus Real Estate Group*, CIV531264 (San Mateo Superior
10 Court wage and hour class action appointing Protection Law Group, LLP as
11 class counsel in settlement);
- 12 • *Martinez v. AMRO Fabricating Corp.*, BC681938 (Los Angeles Superior
13 Court wage and hour class action appointing Protection Law Group, LLP as
14 class counsel in settlement);
- 15 • *Ramirez v. Western National Properties*, BC639319 (Los Angeles Superior
16 Court wage and hour class action appointing Protection law Group, LLP as
17 class counsel in settlement);
- 18 • *Hernandez v. Access Dental Plan et al.*, 34-2017-00220944 (Sacramento
19 Superior Court wage and hour class action appointing Protection Law Group,
20 LLP as class counsel in settlement);
- 21 • *Fernandez v. Sumitomo Rubber North America, Inc.*, CIVDS1803211 (San
22 Bernardino Superior Court wage and hour class action appointing Protection
23 Law Group, LLP as class counsel in settlement);
- 24 • *Gomez v. Fairway Staffing Services, Inc.*, BC689771 (Los Angeles Superior
25 Court wage and hour class action appointing Protection Law Group, LLP as
26 class counsel in settlement);
- 27 • *Fuentes v. Communications Test Design, Inc.*, CIVDS1802427 (San
28 Bernardino Superior Court wage and hour class action appointing Protection

- 1 Law Group, LLP as class counsel in settlement);
- 2 • *Hartline v. Senior Operations, LLC*, BC697665 (Los Angeles Superior Court
- 3 wage and hour class action appointing Protection Law Group, LLP as class
- 4 counsel in settlement);
- 5 • *Carrozzella v. Basalite Concrete Products, LLC*, 34-2014-00220214
- 6 (Sacramento Superior Court wage and hour class action appointing Protection
- 7 Law Group, LLP as class counsel in settlement);
- 8 • *Howey v. Battery Systems, Inc.*, 2026114 (Stanislaus Superior Court wage and
- 9 hour class action appointing Protection Law Group, LLP as class counsel in
- 10 settlement);
- 11 • *Correa v. Cashbak, LLC*, BC723845 (Los Angeles Superior Court wage and
- 12 hour class action appointing Protection Law Group, LLP as class counsel in
- 13 settlement);
- 14 • *Lemus v. Cass Construction*, 37-2017-00028180 (San Diego Superior Court
- 15 wage and hour class action appointing Protection Law Group, LLP as class
- 16 counsel in settlement);
- 17 • *Sales v. J.S. International Shipping Corp.*, 18CIV05048 (San Mateo Superior
- 18 Court wage and hour class action appointing Protection Law Group, LLP as
- 19 class counsel in settlement);
- 20 • *Aparicio v. Advantage Painting*, CIVDS2013809 (San Bernadino County
- 21 Superior Court approving PAGA Settlement);
- 22 • *Rodriguez v. TheRealReal, Inc.*, CGC-19-574661 (San Francisco County
- 23 Superior Court approving PAGA Settlement);
- 24 • *Parm v. Think Together*, CIVDS1823659 (San Bernardino County Superior
- 25 Court approving PAGA Settlement);
- 26 • *Casey-Neith v. Pacific Union Financial*, 30-2018-01014980 (Orange County
- 27 Superior Court approving PAGA Settlement);
- 28 • *Wallace v. Alvarado Restaurant Group, LLC*, 20STCV26260 (Los Angeles

County Superior Court approving PAGA Settlement);

- *Adams v. West Marine Products, Inc.*, 19CIV00436 (San Mateo Superior Court wage and hour class action appointing Protection Law Group, LLP as class counsel in settlement); and
- *Coronel, et al. v. CMH Manufacturing, Inc., et al.*, RIC2003070 (Riverside County Superior Court approving PAGA Settlement).

10. I am fully familiar with the legal and factual issues in this case, and have specific experience litigating complex wage and hour actions as class actions, including employment cases as set forth above.

THE SETTLEMENT IS REASONABLE

12. The preliminarily approved settlement is the result of intense and hotly contested litigation between the Parties. At all times, the negotiations leading to this settlement were adversarial, non-collusive, and at arms' length.

13. Prior to reaching a settlement, Class Counsel conducted significant investigation and discovery into the claims alleged by Plaintiffs. My office researched the enforceability of Defendant's arbitration agreement and engaged in motion practice in opposing Defendant's petition to compel arbitration. Class Counsel further conducted legal research regarding the applicable Labor Code Sections and reviewed and analyzed the Class Members' time and pay records, as well as its relevant employment policies, practices, and procedures. This investigation allowed Class Counsel to effectively and intelligently negotiate the Settlement.

14. The Settlement provides a significant recovery for the Class: (1) the Settlement Class will obtain recovery over a reasonably short period of time as opposed to waiting years for the same, or possibly a worse result; (2) a guaranteed result that compares favorably with other similar class action settlements of this type; (3) significant savings in Class Counsel's fees and costs which would have only increased significantly had the case progressed through trial, appeals, etc. The settlement has also received substantial support from the Class.

15. I am fully familiar with the legal and factual issues in this case, and have specific experience litigating and settlement complex and class actions, including employment cases as

1 set forth above. I have diligently pursued an investigation of the claims asserted against
2 Defendant while Defendant vigorously defended against such claims. Based on my experience
3 for more than 15 years as a defense attorney in wage and hour employment cases and now
4 working as a plaintiffs' attorney for many years puts me in a unique position to evaluate the
5 strengths and weakness of a case and has helped to prosecute matter.

6 16. Accordingly, for the reasons set forth above as well as in Plaintiffs' Motions for
7 Preliminary and Final Approval I submit that the settlement is fair, reasonable, adequate and in
8 the best interest of Plaintiffs and the other Class Members.

9 **WORK PERFORMED BY CLASS COUNSEL**

10 17. The attorneys' fees incurred by Class Counsel are in line with the common fund
11 requested. Class Counsel are seeking 33 1/3% of the common fund for attorneys' fees, or
12 \$316,635.00. Class Counsel have achieved an excellent result for the Class during hard fought
13 negotiations. Class Counsel have extensive experience in wage and hour disputes and thus were
14 able to use their extensive experience and skills to achieve this result.

15 18. I have been engaged in this litigation since associating in the action filed by my
16 co-counsel, Lawyers for Justice PC, with the Orange County Superior Court, *Alvarado v. Citadel*
17 *Servicing Corporation.*, Orange County Superior Court Case No. 30-2019-01057617-CU-OE-
18 CXC, as have several other attorneys and staff members at my firm.

19 19. After conducting extensive investigation and research into the facts and
20 circumstances underlying the pertinent factual and legal issues and applicable law to initiate
21 litigation, I actively participated in opposing Defendant's petition to compel arbitration, litigation
22 and case strategy, investigation, meeting and conferring with Defendant's counsel, performing
23 legal research, and engaging in settlement discussion, among other things. As such, it is my
24 opinion that the percentage fee request is fair and reasonable in light of the work performed and
25 results achieved. It should also be noted that Class Counsel have borne all of the risks and costs
26 of litigation and will not receive any compensation until recovery is obtained. Therefore, the
27 requested fees are reasonable in light of the litigation.

28 20. Including myself, Protection Law Group includes ten (10) attorneys, all of whom

1 actively and continuously represent plaintiffs in employment class actions and representative
2 actions, in Superior Courts throughout the State of California, in the Court of Appeal, and in
3 various Federal courts. Because of the unique history and nature of our practice, all of the
4 attorneys at Protection Law Group have a high level of knowledge and experience in labor and
5 employment law. Besides myself, the following attorneys at Protection Law Group worked on
6 this matter:

- 7 a. Amir Nayebdadash – Founding Partner of Protection Law Group, LLP. Mr.
8 Nayebdadash received his Bachelor of Arts degree from University of California,
9 Los Angeles and a Juris Doctor degree from Pepperdine University School of Law.
10 He was admitted to practice law in California in November of 2004, and has been
11 admitted to practice in all federal district courts in the State of California. Prior to
12 founding Protection Law Group, LLP, Mr. Nayebdadash worked at Littler
13 Mendelson, P.C., the largest labor and employment law firm in the United States. In
14 2013, Mr. Nayebdadash and I founded Protection Law Group LLP. Since the
15 inception of Protection of Law Group, LLP, Mr. Nayebdadash has focused his
16 practice on the representation of employees against employers in California. Mr.
17 Nayebdadash has extensive experience in all aspects of employment litigation, with
18 a focus on wage and hour class and representative action, including, but not limited
19 to taking and defending depositions, briefing and arguing motions, preparing for
20 class certification, negotiating complex wage and hour settlements, trial and appeal.
- 21 b. Priscilla Gamino – Senior Associate at Protection Law Group, LLP. Ms. Gamino
22 received her Bachelor of Arts degree from Brown University and a Juris Doctor
23 degree from California Western School of Law. Ms. Gamino was admitted to
24 practice in California in June 2017 and is admitted to practice law in all California
25 Federal Courts and United States Court of Appeals for the Ninth Circuit. Since being
26 admitted to California State Bar, Ms. Gamino’s practice has focused on the
27 representation of employee plaintiffs in complex wage and hour class and
28 representative actions. Ms. Gamino has extensive experience briefing and arguing

1 motions, managing written discovery, and many other aspects of complex wage and
2 hour disputes.

3 21. My billing rate and the actual rate I charge clients on an hourly basis during the
4 time period involved in this lawsuit ranged from \$750-\$800 per hour. My partner, Mr.
5 Nayebdadash's billing rate during the time period involved in this lawsuit ranged from \$650-
6 \$725 per hour. Ms. Gamino is a Senior Associate with Protection Law Group who worked on
7 the matter and billed at a rate of \$350-\$475 per hour during the time period involved in this
8 lawsuit. While the overwhelming majority of my firm's practice is contingency-based, this is
9 the actual rate we charge billing clients if retained on an hourly basis to handle employment-law
10 related issues.

11 22. Based on my familiarity with prevailing market rates for work of similar
12 complexity in California, including my extensive involvement in fee application work on my
13 own behalf and on behalf of others, I can attest that these hourly rates are within the prevailing
14 market rate for work of similar complexity performed by attorneys of similar skill and
15 experience. I have extensive knowledge of the prevailing hourly rates in the community for
16 work of similar nature and complexity to the work in this case. My experience and knowledge
17 in this regard comes from a variety of sources, including: (a) reviewing dozens of fee
18 applications in other matters; (b) my familiarity with fee application orders in other cases; and
19 (c) my independent research and knowledge of the prevailing market rates based on fee requests
20 of other counsel and my familiarity with rates charged in other law firms; and (d) my
21 independent reading and research regarding law firm billing rates.

22 23. Protection Law Group has spent at least 102.1 hours in this Action. Attached
23 hereto as **Exhibit 1** are true and correct copies of Invoices detailing the exact time expended on
24 this matter up to date by myself and my colleagues, Amir Nayebdadash and Priscilla Gamino.

25 24. The Invoices presented herein reflect an extremely conservative accounting on
26 the time my colleagues and I actually expended on this matter, as it does not include any time I
27 believed the Court may possibly construe as duplicative or arguable non-essential to the
28 litigation (*i.e.*, internal emails, administrative communications, correspondence which was

1 reviewed by more than one attorney, etc.). Time spent on such matters was intentionally omitted
2 by my office in order to avoid any possible appearance of artificial inflation of our lodestar.

3 25. To date, the lodestar for my office using this conservative accounting and
4 applicable billing rate is approximately \$64,145.00. In 2020, the fees invoiced for this Action
5 totaled \$35,665.00. In 2021, the fees invoiced for this Action totaled \$13,280.00. In 2022, the
6 fees invoiced for this Action totaled \$8,400.00. In 2023, the fee for this Action have totaled
7 \$6,800.00. Thus, to date, the fees invoiced have totaled \$64,145.00 (\$35,665.00 + \$13,280.00 +
8 \$8,400.00 + \$6,800.00). *See Exhibit 1.*

9 26. As noted above, this figure represents a conservative calculation of my firm's
10 total lodestar, as it does not include any time I believed the Court may possibly construe as
11 duplicative, administrative in nature, or arguably non-essential to the litigation, nor does it
12 reflect the time my office will be required to expend seeing the Action through the hearing date
13 for the motion for final approval or monitor the disbursement of funds to the Class following a
14 final approval, which is estimated to be at least twenty (20) additional hours work that is
unaccounted for.

15 27. As noted above, the Action was litigated on a contingent basis, meaning Class
16 Counsel bore all the risks should the Action have failed and still bear the risk of taking whatever
17 actions are necessary if Defendant fails to pay. This risk is particularly acute in light of the
18 broad economic uncertainty facing many businesses as a result of the COVID-19 pandemic.

19 28. Further, despite being litigated on a contingent basis, the Action involved
20 analysis and investigation regarding complex questions surrounding class certification and
21 required substantial investigation and complex data analysis to determine Defendant's
22 underlying practices.

23 29. Given the complex nature of these claims and daunting legal challenges, I
24 believe there are very few law firms who could have obtained the settlement obtained here by
25 my office and Co-Counsel. Class Counsel have devoted themselves to pursuing and
26 understanding these types of cases and were able litigate this matter despite risks that may have
27 dissuaded other counsel from pursuing this case.

30. I believe that the efforts of my office and Co-Counsel have resulted in substantial benefits to the Settlement Class, in the form of a substantial settlement fund established to compensate Class Members for Defendant's wage and hour violations. Through the efforts of Class Counsel and Plaintiffs in the Action, a fair and reasonable resolution has been reached that includes a non-reversionary settlement payment by Defendant of \$950,000.00

FEE SPLIT AGREEMENT

31. As provided in the Motion for Preliminary Approval, Plaintiffs have provided written consent to a fee split agreement for this Action. The fee split agreement is the same from that disclosed in Plaintiffs' Motion for Preliminary Approval of Class Action Agreement. The Parties' fee split agreement provides eighty percent (80%) of attorneys' fees to Lawyers *for* Justice, PC and twenty percent (20%) to Protection Law Group LLP.

LITIGATION COSTS AND EXPENSES

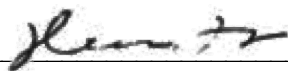
32. Protection Law Group, LLP incurred \$311.10 in costs and expenses in this matter. Attached hereto as **Exhibit 2** is a true and correct copy of the costs incurred to date by Protection Law Group, LLP related to this matter.

SERVICE AWARDS TO THE CLASS REPRESENTATIVES

33. Plaintiffs Ruben Alvarado and Whitey Davis seek a Service Award of \$10,000.00 each. Based on the work Plaintiffs Alvarado and Davis in both bringing their own action against Defendant and in joining this lawsuit, I believe this requested award is both fair and appropriate. Plaintiffs greatly contributed towards the resolution of this matter on a class-wide and PAGA basis. Accordingly, I believe it is appropriate for them to receive a reasonable Service Award of \$10,000.00 each in addition to their individual settlement payments for the services they performed on behalf of others and the complete and general release they agreed to.

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

Executed on May 11, 2023, at El Segundo, California.



Heather Davis

Exhibit 1

Protection Law Group, LLP

136 Main Street, Suite A
El Segundo, CA 90245
Telephone: (424) 290 - 3095
Fax: (866) 264 - 7880

INVOICE

Matter **Period: February 2020**
Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	2/27/2020	Meet and Confer with LFJ re: Notice of Association and Review Files	6.2	\$750.00	\$4,650.00
Heather Davis	2/28/2020	Meet and Confer with LFJ re: Notice of Association	0.5	\$750.00	\$375.00
Amir Nayebedadash	2/28/2020	Review Case File	4.8	\$650.00	\$3,120.00

Total Hours Worked: 11.5

Total Amount Due: \$8,145.00

Protection Law Group, LLP

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INVOICE

Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: March 2020

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	3/2/2020	Further Review Case File and Docket Activity	4.8	\$750.00	\$3,600.00
Priscilla Gamino	3/3/2020	Review and Analyze Defendant's Petition to Compel Individual Arbitration; Declaration of Andrew Deddeh in Support Thereof; Declaration of Paula Risetter in Support Thereof; and [Proposed] Order	6.5	\$350.00	\$2,275.00
Priscilla Gamino	3/4/2020	Research and Draft Opposition to Defendant's Petition to Compel Individual Arbitration	6.8	\$350.00	\$2,380.00
Priscilla Gamino	3/4/2020	Call with Client Ruben Alvarado	1.5	\$350.00	\$525.00
Priscilla Gamino	3/4/2020	Draft Declaration of Plaintiff Ruben Alvarado	2.4	\$350.00	\$840.00
Priscilla Gamino	3/5/2020	Further Draft Opposition to Defendant's Petition to Compel Individual Arbitration; Objections to Evidence Submitted in Support of Defendant's Petition; [Proposed] Order	8.5	\$350.00	\$2,975.00
Heather Davis	3/6/2020	Review Draft Opposition to Defendant's Petition to Compel Individual Arbitration; Declaration of Plaintiff; Objections to Evidence Submitted in Support of Defendant's Petition; [Proposed] Order	2.5	\$750.00	\$1,875.00
Priscilla Gamino	3/7/2020	Call with Client Ruben Alvarado	0.6	\$350.00	\$210.00
Priscilla Gamino	3/9/2020	Further Revise and Finalize Opposition to Defendant's Petition to Compel Individual Arbitration; Declaration of Plaintiff; Objections to Evidence Submitted in Support of Defendant's Petition; [Proposed] Order	3.1	\$350.00	\$1,085.00
Priscilla Gamino	3/9/2020	Meet and Confer with Defendant's Counsel and Draft Joint Case Management Conference Statement	1.5	\$350.00	\$525.00
Heather Davis	3/12/2020	Revise and Finalize Joint Case Management Conference Statement	0.5	\$750.00	\$375.00
Priscilla Gamino	3/13/2020	Review and Analyze Defendant's Reply Brief in Support of Petition to Compel Individual Arbitration; Declarations in Support Thereof	2.8	\$350.00	\$980.00
Heather Davis	3/14/2020	Review Defendant's Reply Brief in Support of Petition to Compel Individual Arbitration; Declarations in Support	1	\$750.00	\$750.00
Heather Davis	3/17/2020	Review and Analyze Court's March 17, 2020 Minute Order	0.1	\$750.00	\$75.00

Total Hours Worked: 42.6

Total Amount Due: \$18,470.00

Protection Law Group, LLP

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INVOICE

Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: May 2020

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	5/13/2020	Correspond with Co-Counsel on Case	0.8	\$750.00	\$600.00
Heather Davis	5/27/2020	Review Court's May 15, 2023 Notice of Continuance re: Defendant's Petition to Compel Individual Arbitration	0.1	\$750.00	\$75.00
Heather Davis	5/27/2020	Review and Analyze Court's May 26, 2020 Minute Order re: Defendant's Petition to Compel Individual Arbitration and Status Conference	0.1	\$750.00	\$75.00

Total Hours Worked: 1

Total Amount Due: \$750.00

Protection Law Group, LLP

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INVOICE

Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: June 2020

Attorney	Date	Activity	Time	Rate	Amount
Priscilla Gamino	6/16/2020	Call with Client Ruben Alvarado	0.5	\$ 350.00	\$ 175.00
Heather Davis	6/17/2020	Correspondence re: Settlement	0.8	\$ 750.00	\$ 600.00
Heather Davis	6/29/2020	Review Emails re: Stipulation to Continue CMC Hearing and Defendant's Motion to Compel Arbitration	0.2	\$750.00	\$ 150.00

Total Hours Worked: 1.5

Total Amount Due: \$925.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: July 2020

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	7/1/2020	Review Correspondence re: Draft Settlement Agreement	0.2	\$750.00	\$150.00
Heather Davis	7/2/2020	Review Correspondence re: Joint Stipulation	0.2	\$750.00	\$150.00
Heather Davis	7/2/2020	Review Correspondence re: Draft Settlement Agreement	0.2	\$750.00	\$150.00
Heather Davis	7/2/2020	Review Notice of Settlement; and Joint Stipulation to Request to Vacate the Upcoming CMC and Hearing on Defendant's Motion to Compel Arbitration; [Proposed] Order Thereon	0.2	\$750.00	\$150.00
Heather Davis	7/22/2020	Review Correspondence re: Draft Settlement Agreement	0.2	\$750.00	\$150.00
Heather Davis	7/23/2020	Review Correspondence re: Draft First Amended Complaint; Draft First Amended Complaint	1.3	\$750.00	\$975.00

Total Hours Worked: 2.3

Total Amount Due: \$1,725.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: August 2020

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	8/5/2020	Review and Analyze Court's August 5, 2020 Minute Order	0.1	\$750.00	\$75.00

Total Hours Worked: 0.1

Total Amount Due: \$75.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: September 2020

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	9/1/2020	Review Correspondence re: Draft First Amended Complaint	0.2	\$750.00	\$150.00
Heather Davis	9/14/2020	Review Correspondence re: Draft First Amended Complaint and Settlement Agreement	0.2	\$750.00	\$150.00
Heather Davis	9/25/2020	Review Defendant's Draft Settlement Agreement, Class Notice, and Proposed Orders	5.6	\$750.00	\$4,200.00

Total Hours Worked: 6

Total Amount Due: \$4,500.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: October 2020

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	10/27/2020	Review Correspondence re: Amended Complaint	0.2	\$750.00	\$150.00
Heather Davis	10/27/2020	Review Correspondence and Draft re: Joint Status Report	0.3	\$750.00	\$225.00
Heather Davis	10/28/2020	Review Correspondence re: Joint Status Report	0.1	\$750.00	\$75.00
Heather Davis	10/28/2020	Review Joint Status Report	0.2	\$750.00	\$150.00
Amir Nayebdadash	10/30/2020	Draft and File Notice of Change of Address	0.5	\$650.00	\$325.00

Total Hours Worked: 1.3

Total Amount Due: \$925.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: November 2020

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	11/4/2020	Review and Analyze Court's November 4, 2020 Minute Order	0.1	\$750.00	\$75.00

Total Hours Worked: 0.1

Total Amount Due: \$75.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: December 2020

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	12/18/2020	Review Court's Notice of Case Reassignment	0.1	\$750.00	\$75.00

Total Hours Worked: 0.1

Total Amount Due: \$75.00

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Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: January 2021

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	1/6/2021	Review Joint Status Conference Statement	0.2	\$800.00	\$160.00
Heather Davis	1/7/2021	Review and Analyze Court's January 6, 2021 Minute Order	0.1	\$800.00	\$80.00
Heather Davis	1/22/2021	Review Correspondence re: Amended Complaint and Settlement Agreement	0.2	\$800.00	\$160.00

Total Hours Worked: 0.5

Total Amount Due: \$400.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: February 2021

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	2/4/2021	Review and Analyze Stipulation of Settlement	3	\$800.00	\$2,400.00
Heather Davis	2/9/2021	Correspondence re: Plaintiffs' Motion for Preliminary Approval of Class Action Settlement	0.3	\$800.00	\$240.00
Heather Davis	2/12/2021	Draft Declaration of Heather Davis In Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement	3.5	\$800.00	\$2,800.00
Heather Davis	2/19/2021	Review Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint; [Proposed] Order Thereon	0.6	\$800.00	\$480.00
Heather Davis	2/19/2021	Review Joint Stipulation to Deem Filing of Motion for Preliminary Approval of Class Action Settlement Timely; and [Proposed] Order	0.5	\$800.00	\$400.00

Total Hours Worked: 7.9

Total Amount Due: \$6,320.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: March 2021

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	3/4/2021	Review February 22, 2021 Order Granting Joint Stipulation for Leave to File First Amended Complaint	0.1	\$800.00	\$80.00
Heather Davis	3/4/2021	Review February 22, 2021 Order Granting Joint Stipulation to Deem Filing of Motion for Preliminary Approval of Class Action Settlement	0.1	\$800.00	\$80.00
Heather Davis	3/10/2021	Review and Analyze Defendant's Answer to Plaintiff's Class Action First Amended Complaint	0.5	\$800.00	\$400.00
Heather Davis	3/19/2021	Revise and Finalize Declaration of Heather Davis In Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement	1.6	\$800.00	\$1,280.00
Heather Davis	3/23/2021	Review Motion for Preliminary Approval of Class Action Settlement; Declarations in Support Thereof; [Proposed] Order for March 24, 2021 Filing	4.5	\$800.00	\$3,600.00

Total Hours Worked: 6.8

Total Amount Due: \$5,440.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: April 2021

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	4/1/2021	Review and Analyze Court's April 1, 2021 Minute Order	0.1	\$800.00	\$80.00
Heather Davis	4/2/2021	Review Joint Response re: Order to Show Cause re Dismissal	0.2	\$800.00	\$160.00
Heather Davis	4/8/2021	Review and Analyze Court's April 8, 2021 Minute Order	0.1	\$800.00	\$80.00
Heather Davis	4/28/2021	Review and Analyze Court's April 27, 2021 Minute Order	0.1	\$800.00	\$80.00

Total Hours Worked: 0.5

Total Amount Due: \$400.00

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Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: May 2021

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	5/26/2021	Review and Analyze Court's May 26, 2021 Minute Order	0.1	\$800.00	\$80.00

Total Hours Worked: 0.1

Total Amount Due: \$80.00

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Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: July 2021

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	7/20/2021	Review and Analyze Court's July 15, 2021 Minute Order	0.1	\$800.00	\$80.00

Total Hours Worked: 0.1

Total Amount Due: \$80.00

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Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: August 2021

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	8/24/2021	Review and Analyze Court's August 18, 2021 Minute Order	0.1	\$800.00	\$80.00

Total Hours Worked: 0.1

Total Amount Due: \$80.00

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Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: September 2021

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	9/9/2021	Review Court's Notice of Case Reassignment	0.1	\$800.00	\$80.00
Heather Davis	9/30/2021	Review and Analyze Court's Minute Order re: Motion for Approval of Class Settlement	0.4	\$800.00	\$320.00

Total Hours Worked: 0.5

Total Amount Due: \$400.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: October 2021

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	10/20/2021	Review Court's October 19, 2021 Minute Order	0.1	\$800.00	\$80.00

Total Hours Worked: 0.1

Total Amount Due: \$80.00

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Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: January 2022

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	1/10/2022	Review Correspondence re: MPA Supplemental Briefing	0.3	\$800.00	\$240.00
Heather Davis	1/14/2022	Review and Analyze Declaration of Joshua B. Wagner in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement	0.2	\$800.00	\$160.00

Total Hours Worked: 0.5

Total Amount Due: \$400.00

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Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: February 2022

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	2/3/2022	Review and Analyze Court's February 3, 2022 Minute Order	0.1	\$800.00	\$80.00
Heather Davis	2/24/2022	Review and Analyze Court's February 23, 2022 Minute Order	0.1	\$800.00	\$80.00

Total Hours Worked: 0.2

Total Amount Due: \$160.00

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Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: May 2022

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	5/11/2022	Review Amendment No. 1 to Stipulation of Settlement; Revised Notice of Class Action Settlement; Request for Exclusion Form; Objection Form; and Dispute Form	2.7	\$800.00	\$2,160.00
Heather Davis	5/13/2022	Review Stipulation and Order for Order to Extend Time to File Supplemental Briefing and Continue Motion for Preliminary Approval	0.2	\$800.00	\$160.00

Total Hours Worked: 2.9

Total Amount Due: \$2,320.00

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Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: June 2022

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	6/27/2022	Review Joint Stipulation for an Order To Extend to File Supplemental Briefing in Support of Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order	0.2	\$800.00	\$160.00

Total Hours Worked: 0.2

Total Amount Due: \$160.00

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Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: July 2022

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	7/12/2022	Review Court's Order Granting Joint Stipulation for an Order to Extend to File Supplemental Briefing in Support of Motion for Preliminary Approval of Class Action Settlement	0.1	\$800.00	\$80.00

Total Hours Worked: 0.1

Total Amount Due: \$80.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: August 2022

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	8/11/2022	Review Plaintiffs' Supplemental Brief in Support of Renewed Motion for Preliminary Approval of Class Action Settlement; Declaration of Brian J. St. John in Support Thereof; Declaration of Joshua B. Wagner in Support Thereof; and [Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement	3.5	\$800.00	\$2,800.00

Total Hours Worked: 3.5

Total Amount Due: \$2,800.00

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Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: September 2022

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	9/8/2022	Review and Analyze Court's Tentative Ruling re: Motion for Approval of Class Settlement	0.2	\$800.00	\$160.00
Heather Davis	9/14/2022	Review and Analyze Court's Minute Order re: Motion for Approval of Class Settlement	0.2	\$800.00	\$160.00

Total Hours Worked: 0.4

Total Amount Due: \$320.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: October 2022

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	10/11/2022	Review Court's Notice of Case Reassignment	0.1	\$800.00	\$80.00
Heather Davis	10/19/2022	Review Correspondence re: Class Data	0.1	\$800.00	\$80.00
Heather Davis	10/20/2020	Review Supplemental Briefing in Support of Motion for Preliminary Approval	2.2	\$800.00	\$1,760.00

Total Hours Worked: 2.4

Total Amount Due: \$1,920.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: November 2022

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	11/2/2022	Review and Analyze Court's Tentative Ruling re: Motion for Approval of Class Settlement	0.1	\$800.00	\$80.00
Heather Davis	11/2/2022	Review Correspondence with Counsel re: Court's Tentative Ruling	0.1	\$800.00	\$80.00
Heather Davis	11/7/2022	Review and Analyze Court's November 4, 2022 Minute Order	0.1	\$800.00	\$80.00

Total Hours Worked: 0.3

Total Amount Due: \$240.00

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Matter

Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: January 2023

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	1/13/2023	Review Filed January 9, 2023 Order Granting Preliminary Approval of Class Action Settlement	0.3	\$800.00	\$240.00
Heather Davis	1/25/2023	Review Correspondence from Settlement Administrator and Formatted Class Notice Packet	1.5	\$800.00	\$1,200.00

Total Hours Worked: 1.8

Total Amount Due: \$1,440.00

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Ruben Alvarado, et al. v. Citadel Servicing Company; Case No. 30-2019-01057617-CU-OE-CXC

Period: May 2023

Attorney	Date	Activity	Time	Rate	Amount
Heather Davis	5/9/2023	Draft Declaration of Heather Davis in Support of Motion for Final Approval of Class Action Settlement; Review Exhibits Thereto	4.9	\$800.00	\$3,920.00
Heather Davis	5/11/2023	Revise and Finalize Declaration of Heather Davis in Support of Motion for Final Approval of Class Action Settlement and Exhibits Thereto	1.8	\$800.00	\$1,440.00

Total Hours Worked: 6.7

Total Amount Due: \$5,360.00

Exhibit 2

ALVARADO, ET AL. V. CITADEL SERVICING CORPORATION
(ORANGE COUNTY SUPERIOR COURT, CASE NO. 30-2019-01057617-CU-OE-CXC)

PROTECTION LAW GROUP LLP - - EXPENSE REPORT

Date	Memo	Debit	
April 2020 - December 2020	Court Filings and Attorney Service Fees	\$	173.60
April 2020 - December 2020	Service Expenses (Mail/One Legal E-Service)	\$	70.00
January 2021 - November 2022	Document Purchase Orange County Superior Court	\$	67.50
TOTAL COSTS		\$	311.10