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Attorneys for Plaintiff James Sims,
the Class, and Aggrieved Employees

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JAMES SIMS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

QG PRINTING II LLC, a Connecticut
limited liability company; 74 QG
PRINTING II LLC, business
organization, form unknown; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 5:20-cv-01632-DMG-KK

**DECLARATION OF KWANPORN
“MAI” TULYATHAN IN SUPPORT OF
PLAINTIFF’S MOTION FOR
ATTORNEYS’ FEES, COSTS, AND
CLASS REPRESENTATIVE
ENHANCEMENT PAYMENT**

Date: April 19, 2024

Time: 10:00 A.M.

Courtroom: 8C

Judge: Hon. Dolly M. Gee

1 **DECLARATION OF KWANPORN “MAI” TULYATHAN**

2 I, Kwanporn “Mai” Tulyathan, declare as follows:

3 1. I am an attorney at law duly admitted to practice before all courts in the
4 State of California and am a member of the law firm of the Diversity Law Group, P.C.,
5 one of the attorneys of record for Plaintiff James Sims (“Plaintiff”), on behalf of himself
6 and other similarly situated individuals, in the above-entitled action. I have personal
7 knowledge of the matters set forth herein, and if called upon as a witness to testify
8 thereto, I could and would competently do so.

9 **LITIGATION BACKGROUND**

10 2. On June 1, 2020, Plaintiff filed the operative class and representative action
11 complaint against Defendant QG Printing II, LLC (“Defendant”) in the Superior Court of
12 California, County of Riverside. Dkt. No. 1-2. The operative Complaint alleges the
13 following causes of action: (1) failure to pay wages; (2) violation of Labor Code § 2802;
14 (3) violation of Labor Code § 226(a); (4) violation of Business and Professions Code §
15 17200, *et seq.*; and (5) violation of Labor Code § 2698, *et seq.*, the Private Attorneys
16 General Act (“PAGA”).

17 3. On August 14, 2020, Defendant removed the action to federal court. Dkt.
18 No. 1.

19 4. Prior to filing this Action, Plaintiff sent notice of alleged Labor Code
20 violations to the California Labor and Workforce Development Agency (the “LWDA”)
21 pursuant to Labor Code § 2699.3.

22 5. Plaintiff’s counsel vigorously litigated this Action since the commencement
23 of the Action, including obtaining class certification and contesting appellate review of
24 the class certification order in the Ninth Circuit. Thus, Plaintiff’s counsel took on
25 substantial risk in litigating the Action and achieved a fair, reasonable, and adequate
26 settlement for the Class.

27 6. After removal of the Action, on August 21, 2020, Defendant filed a Motion
28 to Dismiss Or, In the Alternative, Discretionary Stay Pursuant to First-To-File Rule,

1 based on two prior filed actions alleging similar claims. Dkt. No. 10. On January 14,
2 2021, the Court issued its Order denying Defendant's Motion, in part, finding that the
3 First-To-File-Rule did not prevent Plaintiff from proceeding with his off-the-clock,
4 reporting time pay, and expense reimbursement claims. Dkt. No. 19. The Court ordered
5 a stay on Plaintiff's independent Labor Code § 226(a) claim, and his related PAGA claim
6 based on the same violation, pending resolution of that claim in the prior actions. *Id.*

7 7. On December 17, 2021, Plaintiff filed his Motion for Class Certification,
8 seeking certification of his off-the-clock, reporting time pay, and unpaid reimbursement
9 claims. Dkt. No. 35. Plaintiff submitted various declarations in support of class
10 certification, a reply brief, as well as opposed Defendant's ex parte application. The
11 Court heard oral argument on the class certification motion on March 4, 2022. Following
12 oral argument, on March 4, 2022, the Court issued its Order granting Plaintiff's Motion
13 in part and certified Plaintiff's call-in and reporting time pay claims. Dkt. No. 47, p. 31.

14 8. On March 18, 2022, Defendant moved for reconsideration of the Court's
15 Order granting class certification, which Plaintiff opposed. Dkt. No. 50. The Parties also
16 submitted supplemental briefing in connection with the Motion for Reconsideration. Dkt.
17 Nos. 62-63. On March 22, 2023, the Court issued its Order Denying Defendant's Motion
18 for Reconsideration of the Order Granting Plaintiff's Motion for Class Certification. Dkt.
19 No. 66.

20 9. On April 5, 2023, Defendant filed a Petition for Permission to Appeal Order
21 Granting Class Certification under Fed. R. Civ. P. 23(f) ("Petition") in the Ninth Circuit.
22 9th Cir. Dkt. No. 1. Plaintiff filed his Answer to Defendant's Petition on April 114,
23 2023. 9th Cir. Dkt. No. 2. The Ninth Circuit issued its Order denying the Petition on
24 June 1, 2023. 9th Cir. Dkt. No. 3.

25 10. While Defendant's Petition was pending in the Ninth Circuit, Defendant also
26 filed a Motion to Stay proceedings in this Court. Dkt. No. 68. On April 21, 2023,
27 Plaintiff filed his opposition to the Motion to Stay. Dkt. No. 70. On May 11, 2023, the
28 Court denied Defendant's Motion to Stay. Dkt. No. 72.

1 11. The Parties also participated in two mediation sessions in connection with
2 this Action. On September 7, 2021, the Parties participated in a mediation session with
3 the Honorable Kevin Murphy (Ret.). Despite good faith, arm's length negotiations, the
4 Parties were unable to reach an agreement at the first mediation and resumed litigation
5 thereafter.

6 12. On June 28, 2023, the Parties attempted a second mediation session with
7 experienced neutral Michael J. Loeb, Esq. While the Parties did not reach a settlement on
8 that date, the Parties engaged in negotiations post-mediation facilitated by the mediator
9 for several months and ultimately reached a settlement, the terms of which are
10 memorialized in the Joint Stipulation of Class Action Settlement ("Settlement
11 Agreement" or "Stipulation").

12 13. The Parties have engaged in extensive formal and informal discovery in this
13 Action. As part of formal discovery, Plaintiff has taken numerous depositions, including
14 various Defendant's FRCP 30(b)(6) witnesses on a myriad of topics, over a dozen
15 subpoenaed witnesses/class members, and Defendant's expert witness. Plaintiff's
16 counsel has also defended Plaintiff's deposition.

17 14. In addition to depositions, the Parties also engaged in several rounds of
18 written discovery. Defendant has also produced class data, thousands of pages of call
19 logs, and documents pertaining to the relevant policies and practices at issue. The Parties
20 also engaged in expert discovery.

21 15. As part of informal discovery, Defendant provided information regarding the
22 size and scope of the class for mediation.

23 16. Plaintiff retained an expert witness to conduct data and exposure analysis in
24 connection with mediation.

25 17. On December 28, 2023, this Court issued an order granting Plaintiff's
26 Motion for Preliminary Approval. Dkt. No. 80.

27 18. The Response Deadline as set by the Court is March 25, 2024. Dkt. No. 80.
28 However, due to an unexpected error with Defendant's class list resulting in a slight

1 delay in the mailing of the Class Notice, the Parties agreed to extend the Response
2 Deadline to March 29, 2024, to allow class members 65 days from the date of initial
3 mailing to respond to the Class Notice.

4 19. Based on their own independent investigations and evaluations, the Parties
5 and their respective counsel are of the opinion that settlement for the consideration and
6 on the terms set forth in the Settlement Agreement are fair, reasonable, and adequate and
7 is in the best interests of the Class and Defendant in light of all known facts and
8 circumstances and the expenses and risks inherent in litigation.

9 20. After taking into account sharply disputed factual and legal issues involved
10 in this litigation, the risks attending further prosecution, and the substantial benefits to be
11 received pursuant to the compromise and settlement of the litigation, I have concluded
12 that settlement on the terms hereinafter set forth is appropriate and in the best interests of
13 the Parties and that this settlement is fair and reasonable.

14 21. Plaintiff's counsel's request for fees for one-third of the Gross Settlement
15 Amount and litigation costs was included in the Class Notice that was disseminated to the
16 class members. As of the date of this Declaration, there have been no opt outs submitted
17 to the settlement administrator, and no objections from Class Members filed with the
18 Court. Thus, an inference can be made that the class members approve of the attorney's
19 fee and cost request.

20 **ATTORNEY QUALIFICATIONS**

21 22. I am one of the primary attorneys on this matter. My qualifications are as
22 follows: I received my JD from Loyola Law School in 2017. I received the First Honors
23 Award in Legal Research and Writing, First Honors Award in Appellate Advocacy, and
24 First Honors Award in Civil Litigation Practicum I for achieving the highest grade in
25 those classes. During law school, I was a Staff Editor for Loyola Law Review. I was also
26 an extern at the U.S. District Court, Central District of California, for the Honorable
27 Christina A. Snyder, and a certified law clerk at the San Diego County District Attorney's
28 Office, Collaborative Courts Division, and the Los Angeles County District Attorney's

1 Office, Consumer Protection and Environmental Crimes Division. In 2016, I participated
2 in Loyola Law School's Scott Moot Court Competition, where I placed Top 16 and was
3 the awarded the Top Ten Brief Award. In 2017, I participated in the Employment Rights
4 Clinic, an extension of the Division of Labor Standards Enforcement created to
5 investigate retaliation complaints. Upon graduation from law school, I was admitted to
6 the California Bar in December 2017.

7 23. I am currently an associate at the law firm Diversity Law Group, P.C., an
8 employment law firm that has handled numerous wage and hour class and individual
9 actions, on both plaintiff and defense sides. The firm currently has cases in numerous
10 state courts, including the Santa Clara Superior Court, Los Angeles Superior Court,
11 Orange County Superior Court, San Diego County Superior Court, Monterey County
12 Superior Court, as well as the United States District Courts for the Central, Northern,
13 Southern, and Eastern Districts of California.

14 24. I am currently handling and/or have handled numerous wage and hour class
15 action and PAGA lawsuits.

16 25. In 2018, I argued before the California Court of Appeal, Second Appellate
17 District, in the case of *Lee v. California Commerce Club, Inc.* (California Court of
18 Appeal Case Number B276171, LASC Case Number BC596924), and *Perez v. Standard*
19 *Drywall, Inc.* (California Court of Appeal Case Number A146819, Alameda Sup. Ct. No.
20 RG15761142). In that same year, I also assisted the firm in successfully obtaining class
21 certification and partial summary judgment by the United States District Court, Northern
22 District of California in the case of *Magadia v. Wal-Mart Associates, Inc.* (Case Number
23 17-CV-00062-LHK). I third chaired the bench trial in that same case in December 2018.

24 26. I have also been certified and/or approved as class counsel in numerous
25 other wage/hour class actions. Most recently, I was certified as class counsel in the cases
26 *Garcia v. Wal-Mart Associates, Inc., et al.* (S.D. Cal., Case Number 3:18-cv-00500-L-
27 MDD), *Richert v. Samaritan, LLC, et al.* (Santa Clara County Superior Court, Case
28 Number 17CV314186), *Song v. THC – Orange County, Inc.* (C.D. Cal., Case No. 8-17-

1 cv-965-JLS (DFM)), *Hernandez v. Wells Fargo Bank National Ass'n, et al* (Santa Clara
2 County Superior Court, Case No. 16-CV-299319), and *Sims v. QG Printing II, LLC, et al.*
3 (C.D. Cal., Case No. ED CV 20-1632-DMG (KKx)), as part of the courts' orders granting
4 class certification pursuant to Fed. R. Civ. P. 23 and California Code of Civil Procedure §
5 382.

6 27. Moreover, I was granted final approval as class counsel in *Lao v. H & M*
7 *Hennes & Mauritz, L.P.* (N.D. Cal., Case No. 5:16:cv-333 EJD), *Abarca v. El Estero Car*
8 *Wash, Inc. et al* (Monterey County Superior Court, Case No. 18CV003398), *Valles v.*
9 *Community Hospital of the Monterey Peninsula* (Monterey County Superior Court, Case
10 No. 17CV003452), *Hernandez v. Wells Fargo Bank National Ass'n, et al* (C.D. Cal.,
11 Case No. 16-CV-299319); *Baker v. California Forensic Medical Group, Inc., et al.*,
12 Judicial Council Coordination Proceeding No. 4999 (Lead Case No. 17CV003723);
13 *Mendez v. Falcon Trading Company* (Monterey County Superior Court, Case No.
14 19CV004512).

15 28. To date, I have incurred approximately 420.6 hours in connection with the
16 litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have
17 incurred to date.

18 29. I also anticipate spending an additional 15 hours through the final approval
19 of this settlement, including attending the final approval hearing, handling any issues that
20 may arise with the settlement administrator and class members, handling calls from class
21 members, and further conferring with settlement administrator class members regarding
22 the case post-final approval.

23 30. The total lodestar for my hours will be approximately **\$261,360**, based on
24 the above total hours of 435.6 at an hourly rate of \$600.00 per hour. I have been
25 approved at an hourly rate of \$500.00 per hour by various Courts, in a number of matters,
26 including, but not limited to, *Rachel Smith v. NMSO, Inc.*, Alameda County Superior
27 Court, Case No. RG18907075, *Harris v. 24 Seven, LLC*, Los Angeles County Superior
28 Court, Case No. BC720144, *Mendoza v. Planned Parenthood Mar Monte, Inc.*, Santa

1 Clara County Superior Court, Case No. 18CV329544. As of January 1, 2023, my hourly
2 rate increased to \$600.00 per hour. I have been approved at the hourly rate of \$600.00 in
3 *Moen v. Genentech, Inc.* (San Diego Superior Court Case No. 37-2021-00008619-CU-
4 OE-CTL), *Murray v. Granite Wellness Centers et al.* (Nevada County Superior Court
5 Case No. CU20-084680), *Norman v. B & H Global Marketing, LLC* (Sacramento County
6 Superior Court Case No. 34-2022-00314707), *Osman-Bravard v. Placer Title Company*
7 (Nevada County Superior Court Case No. CU21-085315), and *Cabalo v. Jones Lang*
8 *LaSalle Americas, Inc.* (San Diego County Superior Court Case No. 37-2020-00044322-
9 CU-OE-CTL).

10 31. My firm has incurred costs in the amount of \$30,489.22. The costs are all
11 litigation related costs, including filing and service fees, Court fees, deposition transcript
12 fees, mediation costs for both sessions, postage fees, expert witness fees, and other
13 litigation costs. Attached hereto as **Exhibit B** is copy of the costs my firm has incurred in
14 connection with prosecution of this lawsuit.

15 32. Plaintiff and Plaintiff's counsel are adequate representatives in that they
16 have no conflicts with the Class and will adequately represent the Class.

17 **NOTICE**

18 33. Concurrent with the filing of this Motion, Plaintiff uploaded this motion and
19 to the LWDA's website. A true and correct copy of the LWDA confirmation is attached
20 hereto as **Exhibit C**.

21 34. Pursuant to the Court's Order Granting Plaintiff's Motion For Preliminary
22 Approval, Dkt. No. 80, Plaintiff's counsel directed the settlement administrator to post
23 this Motion on the settlement administrator's website.

24 I declare under penalty of perjury and the laws of the United States of America and
25 the State of California that the foregoing is true and correct and that this declaration was
26 executed on this 4th day of March 2024, at Los Angeles, California.

27 /s/ Kwanporn "Mai" Tulyathan
28 Kwanporn "Mai" Tulyathan

EXHIBIT A

Sims v. QG Printing II, LLC
Kwanporn “Mai” Tulyathan Time and Task Chart

Hours	Description of Work
6.5	Factual investigation, review of file and client documents, confer with co-counsel and client regarding the case upon assignment to case
0.5	Research defendant entities
5.6	Draft complaint and PAGA notice; further review and revise same
0.2	Draft amendment to complaint
0.1	Review court’s notice of assignment and CMC
3.8	Review and analyze Defendant’s notice of removal and exhibits; research re whether to move for remand
0.5	Review Initial Standing Order
2.0	Meet and confer with Defendant re prior filed cases; review and analyze Defendant’s Motion to Dismiss; review Clark and Ramos complaints and docket
9.6	Draft and revise Plaintiff’s opposition to Defendant’s Motion to Dismiss; draft Plaintiff’s notice of new authority
1.0	Review and analyze Defendant’s reply to motion to dismiss
0.6	Review order re Defendant’s Motion to Dismiss, Dkt. No. 19
0.7	Review and analyze Defendant’s Answer
1.7	Review court’s OSC re dismissal, Dkt. No. 22, draft Plaintiff’s response to OSC and joint stipulation to dismiss
3.8	Meet and confer with Defendant re Rule 26(f) conference, conduct telephonic conference; draft, review and revise Joint Rule 26(f) Report; review court’s order re scheduling conference and compliance with FRCP 26(f), Dkt. No. 21
1.3	Further revise Joint Rule 26(f) Report per Dkt. No. 27; further meet and confer with Defendant re same
2.6	Draft Rule 26 initial disclosures, review Defendant’s initial disclosures
1.0	Review order vacating scheduling conference, case management order and pretrial/trial schedules, order to ADR, Dkt. Nos. 29-31
4.0	Draft data request for mediation; meet and confer with Defendant re mediation/selection of mediator/dates; several conferences with Defendant’s counsel regarding data and scheduling of mediation

9.3	Draft and revise mediation brief; conduct legal research for same; review of case law; analyze and review data provided by Defendant in advance of mediation; run exposure analysis
9.5	Prepare for and attend mediation (first session)
0.1	Draft report re early mediation, Dkt. No. 32
3.8	Draft, review, and revise Belaire notice; several meet and confer correspondence with Defendant re same; confer with third party administrator re dissemination of notice
4.0	Draft and revise set one of written discovery requests, including special interrogatories, requests for production, and PMK depo notices
1.3	Draft stipulation re Defendant's time and payroll records; meet and confer regarding same
13.7	Review and analyze Defendant's responses to set one of written discovery, draft meet and confer correspondence; further meet and confer re same; review Defendant's supplemental responses
0.6	Review Defendant's notice of deposition of Plaintiff; meet and confer regarding scheduling of Plaintiff's deposition
0.3	Meet and confer re document production for Plaintiff's and PMK depositions
14.0	Prepare for and defend Plaintiff's deposition
2.6	Review Plaintiff's deposition transcript; confer with client regarding same
2.0	Draft and revise set two of written discovery, including requests for admission, special interrogatories, requests for production
1.5	Prepare deposition subpoenas for class member depositions
15.6	Prepare for and conduct FRCP 30(b)(6) deposition (Riverside); review documents in connection with same; prepare outline; correspondence with court reporter re exhibits; review deposition transcript
8.5	Prepare for and conduct FRCP 30(b)(6) deposition (Sacramento); review documents in connection with same; prepare outline; correspondence with court reporter re exhibits; review deposition transcript
6.5	Prepare for and conduct deposition of Riverside manager; prepare outline; meet and confer with Defendant regarding designation of PMKs
7.5	Review and analyze call logs; further meet and confer re call logs and PMK re data
6.8	Prepare for and conduct FRCP 30(b)(6) deposition re data; review documents in connection with same; prepare outline; review deposition transcript

1.0	Draft set three of written discovery
4.2	Review and analyze class member deposition transcripts
7.4	Respond to class member calls and emails received; prepare supporting declarations for class certification; meet and confer with co-counsel regarding calls
1.0	Review stipulation to continue class certification motion and deadlines; meet and confer re same
33.7	Draft motion for class certification and supporting documents; review evidence/discovery and deposition transcripts in connection with same; research case law
0.7	Draft set four of written discovery
19.3	Review and analyze Defendant's opposition to class certification; review and analyze class member declarations submitted iso Defendant's opposition; Draft Plaintiff's reply iso class certification and objections to evidence; further review evidence and deposition transcripts in support of reply; legal research
3.4	Review Defendant's ex parte application; meet and confer with Defendant re same; draft Plaintiff's opposition thereto; review Dkt. No. 44
2.7	Prepare for and attend class certification hearing; review court's order granting class certification, Dkt. No. 47
4.0	Draft class notice and stipulation to send class notice; draft joint report re class notice distribution; meet and confer re same
3.8	Review and analyze Defendant's motion for reconsideration and supporting docs
24.6	Draft opposition to Defendant's motion for reconsideration, research case law, prepare appendix of evidence; review evidence submitted by Defendant's expert
1.0	Review Defendant's reply iso motion for reconsideration
13.3	Review court's order for supplemental briefing, Dkt. No. 59; draft supplemental briefing iso motion for reconsideration; conduct legal research re same; review Defendant's supplemental briefing
1.8	Draft stipulation to vacate pretrial and trial dates; meet and confer with counsel re same
3.2	Review court's order on Defendant's motion for reconsideration; draft joint status report; meet and confer re same
2.5	Review and analyze Defendant's motion to stay and supporting docs
9.0	Draft opposition to motion to stay and supporting docs, legal research re same; further review and revise same

0.8	Review court's order on Defendant's motion to stay, Dkt. No. 72
34.2	Review and analyze Defendant's Ninth Circuit Petition for Review of class certification order; draft answer to petition for review, revise and revise same; review evidence and conduct legal research in connection with same; further review and revise answer to petition for review
0.1	Review Ninth Circuit Order
0.5	Meet and confer with Defendant re second mediation session
6.3	Meet and confer with expert re data from Defendant for mediation; review expert analysis and exposure analysis
10.2	Draft mediation brief for second mediation session; revise and revise same
1.0	Pre-mediation conference with mediator
9.2	Prepare for and attend mediation (second session)
0.4	Confer with client re mediator's proposal
9.7	Draft Memorandum of Understanding, review and revise same, meet and confer with Defendant's counsel and client in connection with MOU terms
0.2	Draft joint status report re settlement, review court's order; meet and confer with Defendant's counsel
14.4	Draft settlement agreement and related documents (i.e., settlement agreement, class notice); meet and confer with opposing counsel re same; further review and revise same
12.7	Draft Motion for Preliminary Approval and Declarations thereto; confer with opposing counsel and client re same
5.7	Prepare for and attend hearing on motion for preliminary approval; review court order and deadlines
1.2	Confer with settlement administrator regarding settlement approval and timeline and distribution of class notice; review preliminary calculations
1.0	Review and revise stipulation to modify preliminary approval order; meet and confer with Defendant re same
8.6	Draft motion for attorneys' fees; review and revise same
14.7	Draft and revise motion for final approval and supporting documents
420.6	TOTAL HOURS

EXHIBIT B

3/1/2024
12:40 PM

DIVERSITY LAW GROUP
Slip Listing

Page 1

Selection Criteria

Slip Classification Open
Client (hand select) Include: Sims, James v. QG Printing
Slip.Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
62374	EXP	Olympia	1	75.00	75.00
4/14/2020		Court fees			
WIP		Sims, James v. QG Printing			
LWDA					
62802	EXP	Olympia	1	1641.00	1641.00
5/6/2020		Atty Service			
WIP		Sims, James v. QG Printing			
Attorney Service - Complaint					
63481	EXP	Olympia	1	70.99	70.99
7/14/2020		Atty Service			
WIP		Sims, James v. QG Printing			
Attorney Service - Complaint Service					
63726	EXP	Olympia	1	2.00	2.00
8/25/2020		Court fees			
WIP		Sims, James v. QG Printing			
Riverside Superior Court Online Document					
64078	EXP	Olympia	1	0.50	0.50
8/31/2020		Photocopies			
WIP		Sims, James v. QG Printing			
Photocopies					
67044	EXP	Olympia	16	0.25	4.00
3/31/2021		Photocopies			
WIP		Sims, James v. QG Printing			
Photocopies					
67045	EXP	Olympia	1	1.42	1.42
3/31/2021		Postage			
WIP		Sims, James v. QG Printing			
Postage					
68265	EXP	Mai Tulyathan	1	1.47	1.47
6/30/2021		Telephone			
WIP		Sims, James v. QG Printing			
Conference Call					

3/1/2024
12:40 PM

DIVERSITY LAW GROUP
Slip Listing

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
68135	EXP	Olympia	1	1760.75	1760.75
7/16/2021		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Litigation Services & Technologies of California, LLC - Deposition Transcript of Ken Eazell, PMK					
68235	EXP	Olympia	1	526.95	526.95
7/22/2021		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Veritext - Deposition Transcript of Plaintiff					
68269	EXP	Olympia	1	3500.00	3500.00
8/2/2021		Arbitrators			
WIP		Sims, James v. QG Printing			
ADR Services, Inc. Mediation (1st Session)					
69434	EXP	Olympia	1	1045.00	1045.00
10/18/2021		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Steno - Deposition Transcript of Aaron Hess [DELAY PAY - NOT YET PAID]					
69550	EXP	Olympia	1	866.30	866.30
11/4/2021		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Steno Court Reporting - Deposition Transcript of Frank Nofuentes, PMK [DELAY PAY, NOT YET PAID]					
69553	EXP	Olympia	1	461.50	461.50
11/4/2021		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Steno Court Reporting - Deposition Transcript of Angelo Ortiz [DELAY PAY, NOT YET PAID]					
69705	EXP	Olympia	1	485.10	485.10
11/9/2021		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Steno Court Reporter - Deposition Transcript of Kevin Brasser, PMK [DELAY PAY - NOT YET PAID]					
70051	EXP	Olympia	1	1.02	1.02
11/30/2021		Postage			
WIP		Sims, James v. QG Printing			
Postage					

3/1/2024
12:40 PM

DIVERSITY LAW GROUP
Slip Listing

Page 3

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
70450	EXP	Olympia	1	1048.60	1048.60
1/19/2022		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Veritext - Deposition Transcript of Christian Grace & Teresa Perales					
70449	EXP	Olympia	1	749.15	749.15
1/19/2022		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Veritext - Deposition Transcript of Izele Giles & Tony Richard Ornelas					
70485	EXP	Olympia	1	428.75	428.75
1/24/2022		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Veritext - Deposition of Jim Fitzpatrick					
70660	EXP	Olympia	1	679.65	679.65
2/3/2022		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Steno - Deposition Transcript of Jason Mertz [DELAY PAY - NOT YET PAID]					
70721	EXP	Olympia	1	849.15	849.15
2/10/2022		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Steno - Deposition Transcript of Patrick Esquibel [DELAY PAY, NOT YET PAID]					
70718	EXP	Olympia	1	1486.41	1486.41
2/11/2022		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Steno - Deposition Transcript of Felipe Corona [DELAY PAY, NOT YET PAID]					
70729	EXP	Olympia	1	1331.14	1331.14
2/14/2022		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Steno - Deposition Transcript of Elaine Reardon [DELAY PAY, NOT YET PAID]					
70731	EXP	Olympia	1	833.24	833.24
2/14/2022		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Steno - Deposition Transcript of Steven Wilmes [DELAY PAY, NOT YET PAID]					
70732	EXP	Olympia	1	1059.56	1059.56
2/14/2022		Transcript/DEP			
WIP		Sims, James v. QG Printing			
Steno - Deposition Transcript of Rafael					

3/1/2024
12:40 PM

DIVERSITY LAW GROUP
Slip Listing

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
Alvarez [DELAY PAY, NOT YET PAID]				
70733 EXP 2/14/2022 WIP Steno - Deposition Transcript of Aaron Haude [DELAY PAY, NOT YET PAID]	Olympia Transcript/DEP Sims, James v. QG Printing	1	948.80	948.80
71074 EXP 2/25/2022 WIP Attorney Service - Oppo to Ex Parte Chamber Copy	Olympia Atty Service Sims, James v. QG Printing	1	71.96	71.96
71331 EXP 4/7/2022 WIP Maria Bustillos - Transcript	Linda Lee Transcript/DEP Sims, James v. QG Printing	1	392.12	392.12
75324 EXP 3/25/2023 WIP Research	Linda Lee Online researc Sims, James v. QG Printing	1	7.14	7.14
75415 EXP 6/7/2023 WIP JAMS Mediation (2nd Session)	Olympia Arbitrators Sims, James v. QG Printing	1	7975.00	7975.00
75612 EXP 6/24/2023 WIP Federal Express	Olympia Delivery serv Sims, James v. QG Printing	1	35.55	35.55
75552 EXP 7/3/2023 WIP JTC Corporation	Olympia Experts Sims, James v. QG Printing	1	1300.00	1300.00
76268 EXP 10/4/2023 WIP JAMS Mediation	Olympia Arbitrators Sims, James v. QG Printing	1	850.00	850.00
Grand Total				
		Billable	0.00	30489.22
		Unbillable	0.00	0.00
		Total	0.00	30489.22

EXHIBIT C