

WHITEHEAD EMPLOYMENT LAW

Jacob N. Whitehead, Esq. SBN 266123

jacob@jnwpc.com

Meghan N. Higday

mhigday@jnwpc.com

7700 Irvine Center Drive, Suite 930

Irvine, CA 92618

Tel. (949) 674-4922

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP

Norman B. Blumenthal (SBN#068687)

Kyle R. Nordrehaug (SBN #205975)

Aparajit Bhowmik (SBN #248066)

2255 Calle Clara

La Jolla, CA 92037

Telephone: (858) 551-1223

Facsimile: (858) 551-1232

Attorneys for Plaintiffs

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

LILLIA HUPP, ERIC BROWN, PHILIP URIBE,

PATRICIA NWAJEI, ANEESAH WADOOD,

BRIAN MATSUMOTO, LORI JELENICKI,

MICHELLE MIDDLETON, PAULA GARCIA,

KRISTA GODINEZ, COURTLAND GEOFFREY

MILLER, KELLY RIORDAN, GABRIEL

BATCHELDER, ANGELA HANKINS, ANNA

ACOSTA, and TAWANA ROSE MERAZ-PILANA-

MANAGE, on behalf of the State of California, as

private attorney generals,

Plaintiffs

v.

ARTHUR J. GALLAGHER SERVICE COMPANY,

a Delaware corporation; GALLAGHER BASSETT

SERVICES, INC., a Delaware corporation;

ARTHUR J. GALLAGHER & CO. (ILLINOIS), an

Illinois corporation; ARTHUR J GALLAGHER &

CO. INSURANCE BROKERS OF CALIFORNIA,

INC., a California corporation; ARTHUR J.

GALLAGHER RISK MANAGEMENT SERVICES,

INC., an Illinois corporation; and DOES 1 through

25, inclusive,

Defendants

Case No.: 30-2020-01145295-CU-OE-CXC

**DECLARATION OF JACOB N. WHITEHEAD IN
SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF PAGA SETTLEMENT**

1 I, Jacob N. Whitehead, declare as follows:

2 1. I have personal knowledge of the facts set forth in this Declaration and, if called
3 upon as a witness, I could and would testify competently as to these facts under oath.

4 2. I am a member of good standing of the State Bar of California, licensed to practice
5 in the state of California and in the United States District Court (SBN 266123), as well as
6 Washington, D.C. I am the founding shareholder of Whitehead Employment Law, APC, and
7 co-counsel of record for Plaintiffs, Lillia Hupp, Eric Brown, Philip Uribe, Patricia Nwajei,
8 Aneesah Wadood, Brian Matsumoto, Lori Jelenicki, Michelle Middleton, Paula Garcia, Krista
9 Godinez, Courtland Geoffrey Miller, Kelly Riordan, Gabriel Batchelder, Angela Hawkins,
10 Anna Acosta, and Tawana Rose Meraz-Pilana-Manage (“Plaintiffs”) as individuals and on behalf
11 of all others similarly situated.

12 3. I am experience and qualified to evaluate the PAGA claims and the viability of the
13 defenses in this action. I make this Declaration in support of Plaintiffs’ unopposed Motion for
14 Preliminary Approval of PAGA Settlement.

15 Qualifications, Experience And Expertise

16 4. As stated, I founded this firm and my entire career has been devoted to advocating
17 for the rights of individuals who have been subjected to illegal labor and employment
18 practices, including unlawful compensation policies, discrimination, harassment and
19 retaliation. I’ve dedicated my entire practice to litigating and successfully resolving unlawful
20 practice of employers. My practice is devoted 100% to complex civil litigation on behalf of
21 plaintiffs. I have successfully litigated at all stages, up to and including trial. I am admitted to
22 practice before the California State Bar, as well as Washington D.C.. I am also an active
23 member of the American Association for Justice and the Orange County Bar Association.

24 5. Whitehead Employment Law is a highly-regarded firm in the area of wage and hour,
25 and employment in Southern California, and as Plaintiffs’ counsel in many Class and
26 Representative PAGA actions, known as one who has extensive skill and expertise in this
27 specialized area of civil labor and employment litigation.

1 6. As set forth in my firm's present resume' (a copy of which is attached hereto as
2 **Exhibit A**) I have been and am currently lead counsel representing hundreds of Plaintiffs and
3 Class Members in multiple class actions, either settled or currently pending in both state and
4 federal courts, with claims involving wage and hour Class claims and PAGA claims. The
5 following is but a few of the Class and PAGA representative actions I have or am currently
6 litigating, in addition to hundreds of individual labor and employment related cases:

7 a) *Trevion Sherman et al. v. Amazon.com, Services, Inc.* U.S. District Court,
8 Central District, Southern Division, Case No. 8-19-cv-1329-KES) (Settled)

9 b) *Scott Stewart, et al. v. Planet Home Lending, LLC* (Superior Court of the
10 State of California, County of Orange – Civil Complex, Case No. 30-2018-
11 00972671-CU-OE-CJC) involving wage and hour claims of current and former
12 mortgage loan originators (Settled);

13 c) *Weiss/Rowland/Gomez/Mcelhannon et al. v. CarMax Auto Superstores West,*
14 *et al.* a coordinated class action recently settled wage and hour class action that
15 settled for \$6,518,000.00 before the Placer County Superior Court, Case No. S-CV-
16 0036383;

17 d) *Nikolay Popov et al. v. ABC Phones of North Carolina, Inc.* a wage and hour
18 PAGA representative action currently pending at the Orange County Superior
19 Court, Case No. 30-202—01147407-CU-OE-CXC;

20 e) *Brooklyn Harmon et al. v. Doubletree Management, LLC, a wage and hour*
21 *Class action, Santa Barbara Superior Court, Case No. 18CV05027 (Settled);*

22 f) *David LeKhac v. Walgreens Specialty Pharmacy, LLC, a wage and hour*
23 *PAGA representative action, Orange County Superior Court, Case No. 30-2020-*
24 *01143222-CU-OE-CXC (Settled);*

25 g) *Andrew Impey et. al. v. Parsons Transportation Group, Inc.,* a representative
26 PAGA action currently pending before the San Bernardino Superior Court, Case
27 No. CIVSB-2102000;
28

1 h) *Alfreda Lewis et al. v. Saks Southcoast Leasehold, LLC et al.* a coordinated
2 PAGA action currently pending before the Orange County Superior Court, Case
3 No. 30-2020-01143164-CU-OE-CJC;

4 i) *Fareh Zoberi, et al. v. Fitness Alliance, LLC dba EOS Fitness, et al.*, a
5 representative PAGA action currently pending before the San Bernardino County
6 Superior Court, Case No. CIVDS2010622;

7 j) *Tobin Bell, et al. v. Benihana International, Inc. et al.* a representative
8 PAGA action currently pending before the San Diego County Superior Court, Case
9 No. 30-2020-00036597-CU-OE-CXC;

10 k) *Wendy Norris et al. v. PIH Health Inc., et al.* a representative PAGA action,
11 before the Los Angeles County Superior Court, Case No. 19STCV35423 (approval
12 of settlement currently pending)

13 l) *Andrew Saad et. al. v. Greenlink Financial, LLC* (Superior Court of the
14 State of California, County of Orange – Civil Complex, Case No. 30-2018-
15 01021704-CU-OE-CXC) a PAGA representative action in which the Court granted
16 final approval of a PAGA action;

17 m) *Jessica Alvarez v. Old Navy, LLC*, a PAGA representative action currently
18 pending before the Alameda County Superior Court, Case No. RG21095677;

19 n) *Daniel Kelchner v. Jobot, LLC, a wage and hour class action (Orange*
20 *County Superior Court, Case No. 30-2020-01161693-CU-OE-CXC (Settled);*

21 o) *Abel Cachola et al. v. CVS Health Corporation et al.* (U.S. District Court,
22 Eastern District of California, Case No. 1:19-at-534) (Settled);

23 p) *Mehran Kharazi et al. v. LA Depositions, Inc.* Wage and Hour
24 misclassification Class and Representative PAGA action currently pending before
25 the Los Angeles County Superior Court, Case No. 21STCV0401;

26 q) *Jennifer Montano et al. v. Forever 21, Inc. et al.* (currently pending before
27 the United States Bankruptcy Court for the District of Delaware (Case No. 19-
28 12122 (KG) involving wage and hour claims;

1 r) *Sarah Wilkey et al. v. PortNewport, Inc. et al.* (Superior Court of the State
2 of California, County of Orange, Case No. 30-2019-01070051-CU-OE-CXC)
3 involving wage and hour claims (Settled);

4 s) *David Gardner et al. v. Flair Event Models, Inc. et al.* (Case No. 2:16-CV-
5 04371GW (GJSx) (Settled); and

6 t) *Justin Dada et al. v. Cybercoders, Inc.* (Case No. 8:18-cv-01023-JVS-JDE),
7 in which the Court granted a class settlement award of \$1.7 million and \$566,666
8 in attorneys' fees.

9 7. In the present action, Plaintiffs alleged that Defendants failed to Pay All Wages
10 Earned; Failed to Timely Pay All Wages When Due; Failed to Provide Compliant Mandatory Rest
11 Periods and Meal Breaks; Failed to Provide Accurate Wage Statements; Failed to Maintain
12 Accurate Records of All Hours Worked; Failed to Reimburse Work-Related Expenses; Failed to
13 Timely Pay Wages Due to Terminated Employees Upon Separation or Discharge; and violation of
14 the Unfair Competition Law.

15 8. Following expansive investigation and interviews and review of documents provided
16 by Plaintiffs, April 6, 2020, Plaintiff Hupp filed her PAGA notice with the Labor Workforce and
17 Development Agency ("LWDA"), then filed an amended PAGA Notice on June 8, 2020.

18 9. After a thorough study of the legal principles application to the claims asserted against
19 Defendants, my firm drafted and prepared the appropriate Class Action Complaint and filed it on
20 June 29, 2020 with this Court, followed by a First Amended Complaint filed on July 29, 2020,
21 adding PAGA claims pursuant to Labor Code Section 2698, et seq.

22 10. Plaintiffs and Defendants in the related *Garcia* action and the *Hupp* action thereafter
23 agreed to mediate their claims.

24 11. Prior to the mediation the Parties engaged in expansive investigation and evaluation of
25 relevant documents and statistical data, which included payroll records, time keeping records,
26 handbooks, policies, which data was extrapolated and analyzed for damages related to the PAGA
27 claims.

1 12. On November 11, 2020, the Parties engaged in a full day mediation before mediator
2 Hon. Carl J. West (Ret.). Through arm's length and hard fought negotiations, the Parties reach
3 an agreement to settle the PAGA claims in the *Garcia* and *Hupp* actions. After working out all
4 the detailed terms of Settlement which encompassed and resolved the disputed PAGA claims in
5 both the *Garcia* and *Hupp* actions, a Memorandum of Understanding was finalized on January
6 20, 2021.

7 13. I participated in the drafting and review of all filings with the Court, the mediation
8 negotiations, the MOU, and the proposed PAGA Settlement Agreement and actively engaged in
9 correspondence with opposing counsel. I also actively conferred with my clients, co-class
10 counsel and participated in strategy decisions at every step of the litigation.

11 14. For many of the reasons set forth in the Motion for Preliminary Approval, the
12 PAGA Settlement was felt by Plaintiffs' counsel to represent a fair and equitable result for the
13 case, bearing in mind both the risks and benefits of potential further litigation.

14 15. The PAGA Settlement Agreement ("Settlement Agreement") is the product of
15 extensive negotiations by and among the Parties conducted at arms-length and is free from
16 collusion. The Parties on both sides of the *Hupp* and *Garcia* actions are represented by
17 experienced class action attorneys with specialized knowledge of class action, PAGA
18 representative actions and employment law.

19 16. In order to reach the final proposed Settlement Agreement, the Parties exchanged
20 documents, debated issues and negotiated and resolved many complex wage and hour legal and
21 factual issues. During the Settlement process, the Parties on both sides were required to make
22 reasonable compromises in light of the facts, issues and risks presented in this action. All of these
23 factors indicated that the best interests of the Aggrieved Employees would be served by a global
24 settlement in the manner and upon the terms set forth in the proposed Settlement Agreement.

25 17. Based upon the data produced from Defendants, there were 371 Aggrieved
26 Employees employed during the liability period for an aggregate total of 11, 968 pay periods.
27 With assistance of an expert, Plaintiffs calculated the maximum amount of PAGA civil
28 penalties was potentially \$1,108,800.00, an amount the Defendants vigorously disputed. The

1 maximum PAGA penalties potentially available is not a realistic outcome of the litigation
2 because it does not take into account Defendants' defenses. Defendants contended among other
3 things, that their wage and hour policies are lawful and that the Plaintiffs and Aggrieved
4 Employees were properly classified as exempt. Recognizing that Lab. Cod. §2699 (e)(1)
5 permits a Court's considerable discretion to award a lesser amount than the maximum civil
6 penalties, and in consideration of the risk that at trial the actual penalties awarded could be
7 significantly less, the proposed PAGA settlement in the amount of Seven Hundred Thousand
8 (\$700,000.00) is a fair and reasonable recovery. Further, in order to recover any PAGA
9 penalties at trial, Plaintiffs would have to prove each of the underlying violations, and would
10 need to prove as a threshold matter, that the Plaintiffs and Aggrieved Employees were
11 misclassified as exempt and that as a result of such misclassification, each suffered a violation
12 for each pay period the employee worked with regard to the alleged claims including rest and
13 meal break violations, time worked off the clock, overtime wage claims, wage statement claims,
14 Defendant's failure to maintain accurate payroll records, failure to pay wages when due and
15 failure to reimburse for expenses incurred in discharge of their work related duties. As
16 Plaintiffs' counsel, I also considered that if Defendants were to prevail at trial in their defenses,
17 there is a potential risk that PAGA penalties might not be awarded at all.

18 18. If approved, the proposed Settlement will provide meaningful relief in an amount
19 certain and ascertainable that will substantially benefit the State of California and all the
20 Aggrieved Employees right away. Defendant agrees to fund an all-in, non-reversionary total
21 settlement amount not to exceed \$700,000 for the benefit of the Aggrieved Employees, with
22 PAGA Payment to the Aggrieved Employees¹ based on the number of pay periods each
23 Aggrieved Employee worked during the PAGA liability period.

24
25
26
27 ¹¹ The PAGA Payment is an estimated \$434,136, after the deduction of attorneys' fees in the amount of
28 \$233,334 (1/3 of the PAGA Settlement; deduction of costs in an amount not to exceed \$25,000;
deduction of \$7,500 for Settlement Administration costs. As required by Labor Code §2699 75% of
the PAGA Payment will be paid to the LWDA.

1 19. I refer the Court to these documents, as well as the Declaration of co-counsel, Kyle
2 Nordrehaug, of Blumenthal Nordrehaug Bhowmik De Blouw LLP, filed currently herewith, for a
3 detailed overview of the work and hours expended by the attorneys on the matter.

4 20. My firm and co-class counsel took the *Hupp* and *Garcia* actions on a purely
5 contingent basis and co-counsel and I litigated this action without payment for our services or
6 reimbursed of costs incurred, for the benefit of the State of California and the Aggrieved
7 Employees. My firm, Whitehead Employment Law is a comparatively small firm. Accordingly,
8 the number of cases we are able to take on at any given time is limited. Therefore, the firm has
9 to be extremely selective about the cases it does take. Moreover, there was a certain degree of
10 risk that taking on a representative action case of this size and scope because, even with the
11 assistance of co-counsel, it still meant the dedication of a significant portion of my firm's staff
12 and resources and prevented the firm from taking cases which may have been equally or more
13 remunerative than the present case. Additionally, Plaintiffs' counsel have paid all of the costs
14 of these actions up front. Because there is a clearly defined monetary benefit to the Aggrieved
15 Employees, the requested attorneys' fees are fair compensation for obtaining an excellent result
16 for the Aggrieved Employees and in doing so, undertaking the risk and expense and time-
17 consuming litigation on a contingent basis.

18 21. My firm's Lodestar for the *Hupp* / *Garcia* action is currently \$64,430.00. Although I
19 accepted and prosecuted this case on contingency basis, my hourly billing rate is \$950.00, which is
20 commensurate with labor and employment law practitioners of same or similar litigation experience
21 in the Southern California, Los Angeles and Orange County areas. This Lodestar calculation is based
22 on my firm's current billing rates and was prepared from time records regularly prepared and
23 maintained by my firm. The total number of hours reasonably expended on this litigation by my firm
24 is 243.10 hours from its inception in January 24, 2020 through May 18, 2021. Thus the total hourly
25 billing fees, including billing for senior paralegal staff at \$250 per hour; and junior paralegal staff at
26 \$150, are \$64,430.00 This Lodestar calculation is based on the generally accepted law firm and
27 attorney compensation rates for Los Angeles and Orange County.

1 22. Throughout the *Hupp and Garcia Actions* litigation, my firm and Co-Counsel,
2 Blumenthal Nordrehaug Bhowmik De Blouw LLP staffed the matter efficiently and took steps to
3 avoid duplication of efforts.

4 23. Expense items are billed separately and are not duplicated in my firm's lodestar.
5 The expenses my firm incurred in litigating this action are reflected in the books and records of
6 my firm. These records are prepared from expense vouchers, receipts and check records and
7 other source materials and accurately reflect the expenses incurred. My firm incurred a total of
8 \$7,974.86 in unreimbursed expenses and costs from the inception of the *Hupp Action* through
9 May 18, 2021. All of these expenses were reasonable and necessary for the prosecution of this
10 action. A summary of my firm's our billing and costs are submitted herewith as **Exhibit B**,
11 reflecting the extensive amount of work, time and resources office has invested in the case, with
12 payment deferred to the end of the litigation, and then, of course, contingent on the outcome.

13 24. Pursuant to the proposed Settlement Agreement, Class Counsel request that the
14 Court award attorneys' fees in an amount not to exceed one third of the total PAGA settlement
15 amount and costs in an amount not to exceed \$25,000. The payment of Attorneys' Fees shall be
16 made sixty percent (60%) to Blumenthal Nordrehaug Bhowmik De Blouw LLP and forty
17 percent (40%) to Whitehead Employment Law. As noted in the accompanying motion, this
18 percentage is within the standard contingent recovery percentage of one-third, and this
19 percentage is what was expressly approved by the Supreme Court in *Laffitte v. Robert Half Int'l*
20 *Inc.*, 1 Cal.5th 480, 504, (2016). However, if payment of less than one-third of the Gross PAGA
21 Settlement amount in Attorneys' Fees and/ or \$25,000 for attorneys' costs are approved, the
22 unawarded difference will be added to the PAGA payments and shall not revert to PAGA
23 counsel or the Defendants.

24 25. I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct and that this declaration was executed on the 19th Day of May,
26 2021.

27 
28 Jacob N. Whitehead, Esq.

EXHIBIT A



Whitehead Employment Law is proud to practice employment law on behalf of employees exclusively. The firm handles all areas of employment and labor law including wrongful termination, harassment, discrimination, retaliation, whistleblower, and wage and hour claims, among others. The firm is highly experienced with both single plaintiff employment-related cases as well as class action and PAGA representative actions with multiple plaintiffs. With experience litigating nearly 100 class and representative actions, Whitehead Employment Law routinely litigates complex cases that have amassed hundreds of plaintiffs against employers. The firm is highly experienced in litigating in both state and federal court and has recovered millions of dollars for California employees.

Whitehead Employment Law is dedicated to advocating for the rights of workers across California, and has helped a wide range of clients, from minimum-wage hotel and restaurant workers to CEOs, doctors, lawyers and other highly paid professionals. The firm is constantly exploring new ways to efficiently resolve its clients' cases. This unconventional approach has allowed the firm to successfully resolve the cases that other attorneys are unable to resolve.

Founder & Shareholder of Whitehead Employment Law, Jacob N. Whitehead, Esq.

Mr. Whitehead graduated from Whittier Law School in 2009 and joined Hallstrom, Klein & Ward as the founder of their new employment litigation department. He passed the California Bar Exam in 2009 and became a member of the D.C. Bar in 2010. Due to his fluency in Spanish having lived as a missionary in Barcelona, Spain, Mr. Whitehead was able to grow the firm's Spanish-speaking clientele and litigated hundreds of cases for Spanish-speaking clients. Mr. Whitehead single-handedly grew the firm's employment division to hundreds of cases and in 2014, he became a partner at the firm.

In 2015, Mr. Whitehead left to found his own firm, Whitehead Employment Law. Since then, the firm has recovered millions of dollars for its clients in employment-related suits. Mr. Whitehead is a lifetime member of the Million Dollar Advocates Forum, Multi-Million Dollar Advocates Forum, rated in Super Lawyers, named in Lawyers of Distinction, named one of America's Top 100 High Stakes Litigators, ASLA's Top 40 Under 40, and is a sustaining member of organizations that fight for and protect the rights of employees and consumers, including American Association for Justice, Consumer Attorneys of California, and Consumer Attorneys of Los Angeles. Mr. Whitehead is also active in the California Employment Lawyers Association.

EXHIBIT B

WHITEHEAD EMPLOYMENT LAW BILLING SUMMARY REPORT

[illegible]

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	2/7/20	Jacob Whitehead	A111 Other L190 Other Case Assessment, Development and Administration	Fwd: Lillia Hupp vs Gallagher Bassett Class Action- intake questions	0.1	950	95
Service	3/10/20	David Hallstrom	A111 Other L190 Other Case Assessment, Development and Administration	Reviewed case file & ID'd PAGA claims to work on	0.5	0	0
Service	4/3/20	Andrew Ainsworth	A111 Other L190 Other Case Assessment, Development and Administration	Draft PAGA notice.	3.9	600	2340
Service	4/2/20	Debi Pugliese	A107 Communicate (other outside counsel) L190 Other Case Assessment, Development and Administration	4-2-20: Email to A. Ainsworth and request PAGA notice, lit hold letter. (copy Rochelle to provide access to the matter) .2	0.2	250	50
Service	4/3/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	4-3-20: Email from A. Ainsworth re pay stubs and corporate defendant. Look up Gallagher Bassett Services, Inc. on CA SOS. Email information for corporate defendant and copy of most recently filed statement of information to A. Ainsworth. Email to A. Ainsworth with L.C./PAGA statutory requirements for filing/service of PAGA notices. Email to client and request copies of her pay stubs. .5	0.5	250	125
Service	4/5/20	Debi Pugliese	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	4-5-20: Email from/reply to client re pay stubs. .1	0.1	250	25
Service	4/6/20	Andrew Ainsworth		Draft PAGA notice.	2.2	600	1320
Service	4/6/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	File PAGA Ntc. w/ the LWDA	0.5	150	75
Service	4/6/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Save LWDA confirmation to file	0.1	150	15
Service	3/9/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Matter 'Hupp-02-20-00768' custom message shared via Clio Connect	0.1	150	15
Service	4/6/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Thank you for submission of your PAGA Case.	0.1	150	15

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	4/6/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Update PAGA spreadsheet re filing	0.1	150	15
Service	4/6/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Re: Gallagher Bassett PAGA NOTICE. PLEASE FILE WITH THE LWDA TODAY	0.1	150	15
Service	4/6/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Calendar expiration of PAGA waiting period	0.1	150	15
Service	4/6/20	Regina Medina	A103 Draft/revise L190 Other Case Assessment, Development and Administration	Draft Rep/Lit-Hold letter	0.4	150	60
Service	4/6/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Serve defendants w/ PAGA Ntc.	0.2	150	30
Service	4/6/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Re: Gallagher Bassett PAGA NOTICE. PLEASE FILE WITH THE LWDA TODAY	0.1	150	15
Service	4/6/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Re: Lilia Hupp v. Gallagher Bassett Services, Inc. Please draft letter of rep/lit hold request for personnel records	0.1	150	15
Service	4/6/20	Regina Medina	A103 Draft/revise L190 Other Case Assessment, Development and Administration	Draft PAGA letter re filing fees	0.1	150	15
Service	4/6/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Service re rep/lit-hold letter via EdexOne	0.2	150	30
Service	4/6/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Send PAGA filing fees to LWDA via regular US mail	0.2	150	30
Service	4/7/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Serve rep/lit-hold letter via regular U.S. mail	0.1	150	15
Service	4/6/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Enter expense re rep/lit-hold letter	0.1	150	15
Service	4/9/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Enter PAGA filing fee expense	0.1	150	15

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	4/6/20	Debi Pugliese	A104 Review/analyze JC30 Pre-action Protocol (or similar) Work	4-6-20: Send A. Ainsworth factual notes from CLIO and Defendant corporate entity information. Receive and review draft PAGA ntc from A. Ainsworth. Return and request facts be added to support claims of labor code violations. Receive and review further revised PAGA ntc. Edit, finalize. Look up the corporate entity addresses and save to the matter for Regina when filing PAGA ntc with LWDA. Email to Regina with instructions for filing/mailling/and where to find the corporate entity information I saved to the matter. Email from Regina confirming PAGA ntc was filed. Review and download copy of LWDA confirmation of filing. Email from client with attached copy of 2019	3.7	250	925
Service	4/7/20	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	4-7-20: Emails by and among Phi, Rochelle, Jake re prior PAGA notice drafted by Phi N., but not saved to the matter and never filed with LWDA or mailed. Email by/reply to James re 4-6-2020 PAGA notice and lit hold letters are saved in the matter. .2	0.2	250	50
Service	4/15/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Calendar deadline for Defendant to respond to Rep/Lit-Hold letter	0.1	150	15
Service	4/15/20	Debi Pugliese	A129 (UK) Communicate (with Outside Counsel) L190 Other Case Assessment, Development and Administration	4-15-20: Email to Andrew ("AA") requesting draft class action complaint. Copied Rochelle to grant AA access to the matter. .2	0.2	250	50
Service	4/16/20	Debi Pugliese	A107 Communicate (other outside counsel) L190 Other Case Assessment, Development and Administration	4-16-20: Emails with Andrew (AA) re drafting class action complaint. Standard Class Action state court exemplars sent to AA. .3	0.3	250	75
Service	4/28/20	James Chase	A104 Review/analyze L120 Analysis/Strategy	Review, analyze, and update case status and strategy.	0.1	150	15
Service	4/29/20	Andrew Ainsworth		Draft Class Action Complaint.	2	600	1200
Service	4/30/20	Andrew Ainsworth		Draft Class Action Complaint	4	600	2400

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	4/29/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	4-29-20: Create task in CLIO for A. Ainsworth to draft class action complaint. .1	0.1	250	25
Service	4/30/20	Debi Pugliese	A107 Communicate (other outside counsel) L190 Other Case Assessment, Development and Administration	4-30-20: Receive draft complaint from A. Ainsworth for review. .1	0.1	250	25
Service	5/12/20	Debi Pugliese	A103 Draft/revise L210 Pleadings	5-12-20: Look up corporate entity/registered agent information on the CA SOS website and save to the matter. Research for prior filed class actions, discover recently filed (Feb. 2020) class action against defendant by plaintiffs' firm, Blumenthal Nordrehaug Bhowmik De Blouw LLP. Review their website and list of pending class actions. Download copy of their (Garcia v. Gallagher Bassett) wage and hour class action complaint. Save copy to research folder in the matter. Add notes to CLIO. Email to JNW/James re same. Begin review and drafting redline revisions to draft class action complaint. Review PAGA Notice, review client docs re her caseload,	5.5	250	1375
Service	5/13/20	Andrew Ainsworth	A111 Other L190 Other Case Assessment, Development and Administration	Draft Class Action Complaint	0.4	600	240
Service	5/13/20	Debi Pugliese	A103 Draft/revise L210 Pleadings	5-13-20: Receive revised v3 of class action complaint. Further make minor revisions/corrections. Email to client re 2802 cell phone claims. Save to matter pending client response. .5	0.5	250	125

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	5/14/20	Debi Pugliese	A106 Communicate (with client) L210 Pleadings	5-14-20: Follow up TC to client to ask her about personal cell phone use at work. Further revise factual allegations in complaint regarding personal cell phone use in support of 2802 claims. Follow up TC from client re personal cell phone use. Add note to CLIO. Task JNW the complaint is finalized and ask if/when okay to file with the court. .5	0.5	250	125
Service	5/22/20	Debi Pugliese	A103 Draft/revise L120 Analysis/Strategy	5-22-20: Email to Andrew/JNW request revisions to Complaint to augment 2802 factual details and to add our PAGA claim (per 65 day PAGA waiting period expires on June 10th). Work on calculations of estimated PAGA penalties and 4-year class period penalties. Email to JNW. Save to matter. 2.5	2.5	250	625
Service	5/26/20	Andrew Ainsworth		Convert class action complaint to pure PAGA complaint.	2	600	1200
Service	6/5/20	James Chase	A105 Communicate (in firm) L120 Analysis/Strategy	Telephone conference with Attorney Whitehead re case status and strategy. Review and analyze case file re same. Email correspondence to Attorney Whitehead re same.	0.3	150	45
Service	6/8/20	James Chase	A105 Communicate (in firm) L120 Analysis/Strategy	Telephone conference with Attorney Whitehead re case status and strategy. Email to Paralegal Pugliese re Amended PAGA Notice and research re arbitration agreements. Update file re same.	0.3	150	45

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	6/8/20	Debi Pugliese	A103 Draft/revise JC30 Pre-action Protocol (or similar) Work	6-8-20: Email from/reply to James C. re case to be filed as both class and PAGA action, per Jake and request to amend PAGA ntc. Draft amended PAGA notice to add 2802 claims. File Amended PAGA notice online with LWDA. Receive ntc of confirmation of amended PAGA filing from LWDA. Save to matter. Send copy of Amended PAGA to Regina for mailing. Email to/reply from AA re complaint to be revised as both class action with a PAGA claim. 1.3	1.3	250	325
Service	6/9/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Serve Amended PAGA letter via certified mail	0.6	150	90
Service	6/9/20	Regina Medina	Phone Call	Call with Debi re service of Amended PAGA ntc.	0.3	150	45
Service	6/9/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Serve Amended PAGA ntc via certified mail	0.7	150	105
Service	6/9/20	Debi Pugliese	A102 Research L110 Fact Investigation/Development	6-9-20: TC from Regina re mailing of the Amended PAGA notice that was filed yesterday. Online researched re GB's practice of enforcing arbitration agreements. Notes to CLIO and email to JNW/James re findings of no evidence of same. Emails from/replies to JNW re 2802 claims. Fwd JNW email comments instructions for the Complaint to AA who is drafting the class action complaint. 1.4	1.4	250	350
Service	6/10/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Update PAGA spreadsheet re Amended PAGA	0.1	150	15
Service	6/10/20	Debi Pugliese	A111 Other L140 Document/File Management	6-10-20: Update custom fields in CLIO to lit status. .1	0.1	250	25

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	6/11/20	James Chase	A104 Review/analyze L120 Analysis/Strategy	Review and analyze newly retained client, Eric Brown's intake, etc. Update file re same. Link client Eric Brown to lead class action matter, Hupp. Email correspondence to Paralegal Pugliese re client introduction. Update file re same.	0.2	150	30
Service	6/11/20	Andrew Ainsworth		Draft it as a Class/PAGA action	1	600	600
Service	6/11/20	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	6-11-20: Receive and download for review, v4 of draft Complaint from AA. Email from / reply to James. .2	0.2	250	50
Service	6/12/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	6-12-20: Review contingency agreement of Eric Brown. Task Regina to send out lit/hold request for his records to GB. Send self-introduction email as case mgr. email to new client, Eric Brown. Create client group in my contacts. Added him to my contacts. .6	0.6	250	150
Service	6/15/20	Debi Pugliese	A103 Draft/revise L210 Pleadings	6-15-20: TC with JNW re the Complaint and recently amended PAGA notice. Review and download client intake form for Eric Brown. Add E. Brown and his data to the Gallagher Bassett client spreadsheet. Review task status sent to Regina to send lit hold ltr and to request personnel and payroll records for Eric Brown. Review and make revisions to v4 draft complaint. Finalize and save to matter. Email to Regina to prepare S&C and to file at OC Sup. Ct. 2.3	2.3	250	575
Service	6/16/20	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	6-16-20: Email from/reply to JNW re named plaintiff on complaint and re newly engaged plaintiff, Eric Brown. .1	0.1	250	25
Service	6/16/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Begin drafting Summons and Civil Case Cover Sheet	0.4	150	60

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	6/17/20	Regina Medina	A103 Draft/revise L190 Other Case Assessment, Development and Administration	Draft Rep/Lit-Hold letter re Eric Brown and send to Debi	0.3	150	45
Service	6/17/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Serve Rep/Lit-Hold letter	0.8	150	120
Service	6/17/20	Debi Pugliese	A103 Draft/revise L140 Document/File Management	6-17-20: Further emails with James C. re adding plaintiff Eric Brown to the Complaint. Email to Regina re task to send out letter of rep/request for records for Eric Brown. Receive draft letter from Regina. Review, revise, add attachments and send back to Regina in finalized version to be mailed out today. 1.3	1.3	250	325
Service	6/16/20	Regina Medina	Received Email	Receive email from Debi re Philip Uribe signing	0.1	150	15
Service	6/18/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Enter expense re Rep/Lit-Hold letter	0.1	150	15
Service	6/25/20	James Chase	A105 Communicate (in firm) L120 Analysis/Strategy	Email correspondence to team re case strategy re complaint filing.	0.1	150	15
Service	6/25/20	James Chase	A104 Review/analyze L190 Other Case Assessment, Development and Administration	Review and analyze new client Lori Jelenicki's Clio Grow notes and intake form to determine if there is any indication as to an individual claim beyond those claims included in the class action case - no such indication found. Update file re same.	0.2	150	30
Service	6/25/20	Debi Pugliese	A103 Draft/revise L210 Pleadings	6-25-20: Email from/reply to James C. re client Eric Brown. Revise Complaint and add plaintiffs, Eric Brown and newly engaged client, Philip Uribe. Email to James/Regina for filing activities. Task Regina to immediately sent out ltr of rep for P. Uribe/request his personnel records. 2.4	2.4	250	600
Service	6/26/20	Regina Medina	Received Email	Receive and review email from Debi re instructions to draft rep/lit-hold letter re Philip Uribe; and draft supporting docs re Complaint	0.2	150	30

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	6/26/20	Regina Medina	A103 Draft/revise L190 Other Case Assessment, Development and Administration	Draft Rep/Lit-Hold letter re Philip Uribe and send to Debi for review	0.5	150	75
Service	6/26/20	James Chase	A104 Review/analyze L190 Other Case Assessment, Development and Administration	Review and analyze new client Phillip Uribe's Clio Grow notes and intake to evaluate claims and determine whether there are any beyond those already included in the class action claims under the lead Hupp matter. Update file re same.	0.1	150	15
Service	6/26/20	Regina Medina	A103 Draft/revise L190 Other Case Assessment, Development and Administration	Draft Summons, Summons Attachment and Civil Case Cover Sheet and forward to Debi for review	0.6	150	90
Service	6/26/20	Debi Pugliese	A104 Review/analyze L210 Pleadings	6-26-20: Receive and review Regina's draft letter of rep/lit hold/request for personnel records. Replied it was good to go out. Receive and review Regina's draft Summons, Summons attachment and Civil Cover Sheet. Made corrections and return to Regina for filing with the Complaint.	0.4	250	100
Service	6/26/20	Regina Medina	Received Email	Receive and review email from Debi re changes to Civil Case Cover Sheet and Summons	0.2	150	30
Service	6/26/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Finalize Complaint and supporting docs and file via One Legal	0.5	150	75
Service	6/26/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Finalize and mail serve Philip Uribe rep/lit-hold letter	0.5	150	75
Service	6/29/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Calendar deadlines for Defendant to respond to Rep/Lit-Hold letters	0.2	150	30
Service	6/29/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Download and save conformed copies re Complaint	0.2	150	30

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	6/29/20	Debi Pugliese	A110 Manage data/files L140 Document/File Management	6-29-20: Review file for status. Email to/reply from Rochelle re importing Philip Uribe to the client log sheet. Email to/ reply from Regina re tracking dates of lit hold letters. Updated client log sheet and input the data for Philip Uribe. .5	0.5	250	125
Service	7/2/20	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	7-2-20: Email from/ reply to Rochelle re new client, Philip Uribe exported to CLIO. .1	0.1	250	25
Service	7/6/20	James Chase	A104 Review/analyze L190 Other Case Assessment, Development and Administration	Review and analyze new client Brian Matsumoto's Clio Grow notes and determine whether there are any beyond those already included in the class action claims under the lead Hupp matter. Update file re same.	0.1	150	15
Service	7/7/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Enter expense re Complaint filing/initial fees	0.1	150	15
Service	7/9/20	Regina Medina	A103 Draft/revise L190 Other Case Assessment, Development and Administration	Draft instructions re SOP and send to Debi for Review	0.3	150	45
Service	7/9/20	Regina Medina	Received Email	Receive and forward email re confirmation of service and save to file	0.1	150	15

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	7/9/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	7-9-20: Review file for status on S&C. Log into One Legal and download conformed copies of S&C filed on June 29, 2020. Save the conformed copies to the matter. Follow up email to Regina reminding her to check One Legal daily for conformed/accepted filed docs. Request she proceed with placing order for service of process of S&C on Defendants. Copied on email to new client by Rochelle. Review and update the data on the client log sheet. Email from Regina requesting review of order for service of process. Review service orders and approve to send out. .8	0.8	250	200
Service	7/10/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Receive and forward 4/5 of the confirmations re service of process	0.1	150	15
Service	7/10/20	James Chase	A104 Review/analyze L190 Other Case Assessment, Development and Administration	Review and analyze recently retained client Aneesah Wadood Clio Grow notes and intake. Email correspondence to Paralegal Pugliese re same.	0.1	150	15
Service	7/10/20	Debi Pugliese	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	7-10-20: Email from James C. re any individual WT claims of client, Annesha Wadood. Called Ms. Wadood, introduced myself as case manager. We discussed her claims. No individual claims at all per client. Follow up email to James C. to let him know Ms. Wadood has no individual claims. .5	0.5	250	125
Service	7/15/20	Debi Pugliese	A111 Other L140 Document/File Management	7-15-20: Receive and download signed contingency agmt for Patricia Nwajei. .1	0.1	250	25
Service	7/16/20	James Chase	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	Review and analyze client intake information on Patricia Nwajei. Email correspondence to Paralegal Pugliese re recently retained client, Patricia Nwajei.	0.2	150	30

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	7/16/20	James Chase	A111 Other L190 Other Case Assessment, Development and Administration	Update file re representing Patricia Nwajei.	0.1	150	15
Service	7/16/20	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	7-16-20: Email from reply to James C. re Patricia Nwajei and any individual claims. .1	0.1	250	25
Service	7/21/20	Debi Pugliese	A104 Review/analyze L190 Other Case Assessment, Development and Administration	7-21-20: Audit case docs. Pleadings and PAGA and amended PAGA ntc. Email to Regina re status on service of process. Email to / reply from Jake re filing our FAC to add the PAGA claims. Task Andrew in CLIO to draft the FAC. .9	0.9	250	225
Service	7/22/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Receive and review proofs of service and send email to Debi re same	0.5	150	75
Service	7/22/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Download and save proofs of service and create folder re same	0.2	150	30
Service	7/22/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Send instructions to Nationwide re corrections to POS.	0.3	150	45
Service	7/22/20	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	7-22-20: Email from Regina re status on proofs of service of S&C on Defendants, with attached copies with errors. Review the proofs of service. Reply and ask Regina to send it back to Nationwide and ask that the proofs be corrected, at no charge to us. Follow up mail with corrected revised proofs of service. Email Regina and tell her to proceed with filing the Proofs of Service. Email from/reply to Andrew A re priority on drafting the Hupp FAC adding our PAGA claims. .6	0.6	250	150

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	7/23/20	Debi Pugliese	A104 Review/analyze L210 Pleadings	7-23-20: Receive draft FAC from Andrew, who didn't have information for our plaintiff, B. Matsumoto. Replied to Andrew with information for Mr. Matsumoto to add to the FAC. Receive and review with redline revisions the draft FAC. Return to Andrew to revise and finalize with comments re the draft FAC. Email from / reply to B. Matsumoto who requested a copy of his signed Contingency. Copy of his finalized signed contingency sent. 1.3	1.3	250	325
Service	7/27/20	Debi Pugliese	A104 Review/analyze L210 Pleadings	7-27-20: Add two further comments to the draft FAC. Email to JNW/Andrew re adding in both exempt and non-exempt employees. Save copies of Drafts v1 and v2 rl of the FAC to the matter. Email reply from Andrew re language in our PAGA ntc. Email from JNW in response to my email re salaried exempt and non-exempt employees. Email reply and ask Andrew to revise in accordance with JNW's email and my redlines. .6	0.6	250	150
Service	7/28/20	Debi Pugliese	A104 Review/analyze L210 Pleadings	7-28-20: Receive and review Andrew's FAC. Approve for filing with no revisions. Save final draft to the matter. Email to Regina with details and instructions to finalize, file and serve. Follow up with task in Clio for Regina to file and serve FAC. Update case to "litigation" status in Clio. .5	0.5	250	125
Service	7/29/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Attach exhibit to First Amended Complaint and finalize	0.2	150	30
Service	7/29/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	File FAC via One Legal	0.2	150	30

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	7/29/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Receive email re One Legal expense re filing of Amended Complaint	0.2	150	30
Service	7/29/20	Regina Medina	Received Email	Receive email re conformed copy re FAC; save to file and forward copy to Debi re same	0.2	150	30
Service	7/29/20	Debi Pugliese	A104 Review/analyze L140 Document/File Management	7-29-20: Receive and review conformed filed copy of the FAC from Regina. .1	0.1	250	25
Service	7/30/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	7-30-20: Email from OPC Caitlin Tran seeking TC with JNW to discuss matter. Add OPC to CLIO and add as a related contact to the matter. TC with JNW re LC 226 claims. Review file docs and lit hold letters/requests for records prior sent out. Send email to Regina to send out letter of rep/lit hold/request personnel records for clients, P. Nwajei, A. Wadood, B. Matsumoto, L. Jeleniki and M. Middleton. In same email copy Andrew A. and ask him to please draft SAC to add a COA for violation of 226 (c) and to seek penalties under 226 (f) on behalf of plfs, L. Hupp, E. Brown, and P. Uribe. Review the Garcia class action complaint filed by the Blumental firm Feb. 7, 2020. Send copy to JNW	1	250	250
Service	7/31/20	Regina Medina	Phone Call	Call w/ Debi re Rep/Lit-hold letter	0.2	150	30
Service	7/31/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Receive email from Debi re combined rep/lit-hold letter	0.2	150	30
Service	7/31/20	Regina Medina	A103 Draft/revise L190 Other Case Assessment, Development and Administration	Draft rep/lit-hold letter re Patricia Nwajei, Anisha Wadood, Brian Matsumoto, Lori Jeleniki and Michelle Middleton	0.7	150	105
Service	7/31/20	Regina Medina	Received Email	Receive email re Debi's redline re rep/lit-hold letter	0.2	150	30
Service	7/31/20	Regina Medina	A103 Draft/revise L190 Other Case Assessment, Development and Administration	Make changes to rep/lit-hold letter per redline	0.8	150	120
Service	7/31/20	Regina Medina	Phone Call	Telephone conference w/ Paralegal Debi re Rep/Lit-Hold redline	0.2	150	30

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	7/31/20	Regina Medina	A103 Draft/revise L190 Other Case Assessment, Development and Administration	Continue drafting rep/lit-hold correspondence per Paralegal Debi's comments	0.4	150	60
Service	7/31/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Finalize rep/lit-hold letter and serve via email to OPC	0.2	150	30
Service	7/31/20	Debi Pugliese	A104 Review/analyze JE30 Requests for Further Information	7-31-20: TC from Regina re assignment to send out lit hold/request for records for clients P. Nwajei, A. Wadood, B. Matsumoto, L. Jeleniki and M. Middleton. Sent her a template with language and highlighted areas she needed to customized. Receive & reviewed lit/hold/request for records from Regina. It was wrong and not same template. Redlined it with detailed comments for her instruction and sent it back. Received revised copy which was still all redlines. TC with Regina to instruct her on how to accept the redlines and finalize. Review client log sheet. Email Regina and remind her to update the client log sheet after she sends out the lit/hold request for	1.2	250	300
Service	8/3/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Meet w/ JW re strategy to respond to OPC	0.2	150	30
Service	8/3/20	Regina Medina	Received Email	Review and analyze email from Paralegal Pugliese	0.1	150	15
Service	8/3/20	Debi Pugliese	A107 (UK) Communicate (Other Party(s)/other outside lawyers) L190 Other Case Assessment, Development and Administration	8-3-20: Email from C. Tran re Lit/Hold request for records sent out on July 31, 2020. TC with Regina regarding the Lit hold letter and Jake's email. TC with JNW re July 31, 2020 lit hold/request for personnel records. Send email response to opposing counsel, attaching copy of the FAC and prior sent requests for records for Hupp, Uribe and Eric Brown.	0.6	250	150
Service	8/6/20	Regina Medina	Phone Call	Conduct phone calls to clients to gather info re 2802 claims	0.6	150	90

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	8/6/20	Regina Medina	Phone Call	Conduct various phone calls with team and Nationwide re service of process re FAC	1	150	150
Service	8/6/20	Regina Medina	A103 Draft/revise L190 Other Case Assessment, Development and Administration	Draft service instructions for First Amended Complaint and send to Nationwide	0.3	150	45
Service	8/5/20	Debi Pugliese	A102 Research L120 Analysis/Strategy	8-5-20: TC with JNW re our Class case. Work on research per JNW's request re viability of class claims. Research current status of the Garcia v. GB class action. Email findings and attach documents downloaded from SB Sup. Ct. docket to JNW. Research the class and subclass definitions in the Garcia original complaint and the COAs brought on behalf of the two subclasses. Email to JNW re same. Continue working on research re removal and potential strategies, law or statutes prohibiting removal. 3.5	3.5	250	875
Service	8/6/20	Debi Pugliese	A102 Research L120 Analysis/Strategy	8-6-20: WORK ON GB research and gather facts, cases and client data for JNW. Multiple TCs and emails with JNW and Regina and process service company to facilitate a service of process of the FAC on the forum Defendant and defense counsel. More legal research and review of the GB arbitration agreement terms and provisions. Email findings and status updates to JNW. Review clients' notes/intakes to determine 2802 claims. Review and analyze Garcia FAC and Hupp FAC and prepare comparison log of claims between the two. Send comparison log to JNW. Finalize research memo and send to JNW for review. Save all research to the	8.5	250	2125
Service	8/7/20	Regina Medina	Received Phone Call	Received phone call from Aneesah re 2802 claims	0.4	150	60
Service	8/7/20	Regina Medina	Phone Call	Phone call w/ Debi re Hupp service of process and 2802 claims	0.3	150	45

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	8/7/20	Regina Medina	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	Email communication w/ Debi re checking docket re Notice of case assignment to Judge Peter Wilson, dated June 29th.	0.2	150	30
Service	8/7/20	Debi Pugliese	A103 Draft/revise L250 Other Written Motions and Submissions	8-7-20: TC from Regina re service of process of the FAC on the remaining defendants and status of her phone calls to the clients to confirm their 2802 claims. TC from JNW re discussion with OPC. Per discussion and JNW instruction, send email to OPC with substance of proposal for a Joint Stip. Per OPC approval, work on draft Joint Stip for Dismissal of Class Claims and Proposed Order and accompanying Decl. of JNW in support Review and prepare Exhibits for JNW decl. Email to JNW with questions about exhibits. Further revise and send v2 of the Joint Stip and Declaration of JNW to OPC. Email to Regina re preparation of the POS. Receive and review proposed revisions from OPC	4	250	1000
Service	8/10/20	James Chase	A104 Review/analyze L190 Other Case Assessment, Development and Administration	Review and analyze Court's Minute Order dated August 10, 2020. Instructions to staff re same, including docketing hearing and deadline to file CMS. Update file re same.	0.1	150	15
Service	8/10/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Draft POS re Ntc. of CMC, finalize, file and serve with court.	0.5	150	75
Service	8/10/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	File and serve Notice of CMC	0.5	150	75
Service	8/10/20	Regina Medina	A103 Draft/revise L190 Other Case Assessment, Development and Administration	Draft service instructions to Nationwide to serve the remainder of the Defendants re the FAC	0.3	150	45

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	8/10/20	Debi Pugliese	A103 Draft/revise L250 Other Written Motions and Submissions	8-10-20: Receive and review Court's 8-10-20 minute order setting case management conference, designating case as complex. Per order, draft notice of CMC. Send to Regina for filing and service on OPC. Email from/reply to JNW re same. .6	0.6	250	150
Service	8/11/20	Regina Medina	Received Phone Call	Receive phone call from Court Clerk re Defendant's failure to pay initial fees and receive instructions to forward to Defendant's Counsel	0.2	150	30
Service	8/11/20	Regina Medina	Sent Email	Send email to OPC re Clerk's instructions to pay initial fees	0.2	150	30
Service	8/11/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Download signed Order re Dismissal and forward to OPC	0.2	150	30
Service	8/11/20	Debi Pugliese	A104 Review/analyze L190 Other Case Assessment, Development and Administration	8-11-20: Emails from, by, among Regina, C. Tran and JNW re TC from the clerk of the court with a message for Ms. Tran re first appearance fees and service of process of our FAC on the defendants. Receive copies of defendants' Notice of Appearance and Notice of Posting Complex Civil Fees. Receive and review Judge Wilson's executed order approving Joint Stip for Dismissal of Class and individual claims. Save copy of signed Order to the matter. .5	0.5	250	125
Service	8/18/20	Debi Pugliese	Received Email	8-18-21: Copied on JNW's email to C. Tran re steps to join the pending mediation or alternatively for setting an independent date. .1	0.1	250	25
Service	8/18/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Receive email w/ draft POS from Nationwide; save to file and review; send email to Debi re same	0.2	150	30

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	8/19/20	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	8-19-20: Receive POS of S&C/FAC for Defendant, Arthur J. Gallagher & Co. Insurance Brokers of California, Inc. Email to Regina asking about the proofs of service for the other defendants; ask her to file the POS with the court. Create subfolder in matter for the proof of service. TC from Regina re cancellation of other orders for POS after we filed our dismissal of class and individual claims. .5	0.5	250	125
Service	8/19/20	Regina Medina	Phone Call	Phone call w/ Debi re service of process	0.2	150	30
Service	8/20/20	Regina Medina	Sent Email	Send email re Hupp filing of POS and save confirmation re same	0.2	150	30
Service	8/21/20	Debi Pugliese	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	8-21-20: Emails within WEL team re new client email to Kelly Riordan. Email to Ms. Riordan. Reply from Ms. Riordan objecting to our request for records. Respond to Ms. Riordan. Status inquiry from and reply to C. Tran re service of process of the FAC on Defendants. .6	0.6	250	150
Service	8/24/20	Debi Pugliese	A103 Draft/revise L250 Other Written Motions and Submissions	8-24-20: Draft Plaintiff's Objective Case Summary. Send to Regina to file and serve. Work on draft bucket list letter to OPC re pre-mediation exchange of documents. Multiple emails with C. Tran, OPC re service of process of the FAC. TC and emails with Regina to follow up with Nationwide re service of the FAC. Review email responses from Nationwide re service of process of the FAC. TC with JNW to discuss the service of process issue. Send email requesting availability for a TC with OPC. Email from JNW requesting preparation of Notice and Acknowledgment of Receipt for service of the FAC of all Defendants for OPC. Follow up email to Regina re filing of the	3.4	250	850

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	8/24/20	Regina Medina	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	Multiple phone calls and email re service of process issue with Paralegal Pugliese and Nationwide	1.2	150	180
Service	8/25/20	Debi Pugliese	A103 Draft/revise JD10 Mediation	8-25-20: Draft Bucket List pre-mediation letter to OPC; send draft to JNW. TC with JNW and discuss letters of representation/request for records for newly engaged non-named plaintiffs. Draft ltr and our PAGA claims. Revise draft bucket list letter. Update in Clio to hold pending further feedback and info pending from OPC re mediation. 1.2	1.2	250	300
Service	9/2/20	James Chase	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	Email correspondence to Paralegal Medina re arranging CourtCall appearance for Friday's Status Conference.	0.1	150	15
Service	9/2/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Arrange telephonic appearance for Attorney Whitehead to appear at 9/4/2020 status conference and send email confirmation to Paralegal Chase and Attorney Whitehead re same	0.2	150	30
Service	9/2/20	Debi Pugliese	A104 Review/analyze L190 Other Case Assessment, Development and Administration	9-2-20: Receive and download signed Contingency Agreement for new client, Gabriel Batchelder. .1	0.1	250	25
Service	9/4/20	Debi Pugliese	A103 Draft/revise L250 Other Written Motions and Submissions	9-4-20: Per email from JNW, draft Ntc of CMC. Fwd to Regina to file and serve on OPC. Calendar Jan. 22, 2021 CMC. Calendar hearing date and deadline to file Joint Case Status report in Clio. Email from/reply to Regina re filing the notice today. .5	0.5	250	125
Service	9/4/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	File and serve Notice of CMC	0.5	150	75
Service	9/8/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Input expense re filing of Ntc. of CMC into Clio	0.1	150	15

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	9/8/20	Debi Pugliese	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	9-8-20: Email to JNW asking if we have any mediation dates/information from OPC. Returned TC from client P. Uribe. Provided Mr. Uribe with a status update on the matter. Review and finish filling in all of our clients' information on the client log sheet. .6	0.6	250	150
Service	9/9/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	9-9-20: Email from JNW. Finalize and send bucket list letter re pre-mediation exchange of docs to OPC, Caitlin Tran. Save copy to matter. Notes to Clio. .3	0.3	250	75
Service	9/14/20	Debi Pugliese	Received Email	9-14-20: Email from C. Tran with names of three proposed mediators. Copied on JNW email to Regina to find out which mediator is available first. .1	0.1	250	25
Service	9/24/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Email correspondence to OPC re Mediator's availability	0.1	150	15
Service	9/25/20	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	9-25-20: Review case status. Sent email to /reply from Regina requesting status re dates of availability for mediators. .3	0.3	250	75
Service	9/28/20	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	9-28-20: Emails with Becca re a glitch in the fields in employee authorizations. Review the 10 authorizations we have. Reply to Becca. Receive email from Regina re J. Grossman's dates of availability and emails between C. Tran re dates for November. .4	0.4	250	100
Service	9/29/20	Regina Medina	Sent Email	Send email to case manager re Aneesa Wadood's phone call re GB preventing future employment at GB	0.2	150	30

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	9/29/20	Debi Pugliese	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	9-29-20: Email from/reply to Regina re TC from client Annesah Wood. Called Ms. Wood, left a voicemail message asking her to please give me a call back. Receive a call from client Annesah Wood. Discuss issue re temp agencies not referring or placing any former GB clients who were laid off. Add notes re TC to Clio. 1.0	1	250	250
Service	10/1/20	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	10-1-20: TC with JNW re temp agency not placing former GB employees who were laid off. .1	0.1	250	25
Service	10/2/20	Debi Pugliese	Sent Email	10-2-20: Email to client, Aneesah Wadood requested temp agency contact info. .1	0.1	250	25
Service	10/5/20	Regina Medina	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	Email communication w/ Paralegal Pugliese re contacting clients re Mediation	0.2	150	30
Service	10/5/20	Regina Medina	Received Email	Receive email from OPC re Mediation confirmation for November 18	0.1	150	15
Service	10/5/20	Regina Medina	A111 Other L190 Other Case Assessment, Development and Administration	Docket calendar re Mediation on Nov 18	0.1	150	15
Service	10/5/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	10-5-20: Receive reserved November 18, 2020 mediation date from Regina. Follow up email from / reply to Regina re notifying clients about the mediation. Review client logsheet. Download and review contingency agreement for new client, Ms. Hankins. Prepare the Mediation Disclosures and Acknowledgments for Plaintiffs. Save to matter. TC with JNW re the mediation and details to follow up on with OPC and the clients. 1.6	1.6	250	400

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	10/7/20	Debi Pugliese	A103 Draft/revise L190 Other Case Assessment, Development and Administration	10-7-20: Draft email to OPC re mediation and pre mediation exchange of documents. Send draft to JNW to review before sending to OPC. .5	0.5	250	125
Service	10/8/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	10-8-20: Email reminder to JNW re draft email correspondence to OPC. Per JNW approval sent email to OPC, C. Tran. .2	0.2	250	50
Service	10/9/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	10-9-20: Email from OPC, C. Tran, proposing TC with JNW on Monday. Review JNW's calendar. Reply to Ms. Tran, proposing 3 p.m. for TC on Mon. Oct. 12, 2020. Email from C. Tran confirming 3 p.m. email to /reply from Rochelle asking which phone JNW prefers for calls with OPC... (ofs or his cell.) Follow up email to JNW. .5	0.5	250	125
Service	10/12/20	Debi Pugliese	A102 Research JC20 Legal Investigation	10-12-20: TC with JNW re his TC today with OPC. Search for CA Supreme Court case re Sedgewick ruling re claims administrators exempt employees. Case not found. Task self in CLIO. Follow up needed. .6	0.6	250	150
Service	10/13/20	Debi Pugliese	A102 Research JC20 Legal Investigation	10-13-20: TC from client, Eric Brown wanting to know case status. Explained present status and that the case is going to mediation. Legal research on Westlaw trying to find the Sedgwick case. Review and download several other cases ruling on exempt question re claims examiners, including the CA Supreme Ct. decision in Harris v. Superior Court. 2.3	2.3	250	575

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	10/21/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	10-21-20: Receive and review JAMS mediation notice. Calendar details / mediation filing and pmt of mediation fees deadlines in Clio. Save copy to the matter. Send email to JNW/Rochelle/Regina re the Mediation Disclosure and Acknowledgments. .5	0.5	250	125
Service	10/22/20	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	10-22-20: Email from JNW re Mediation Disclosure Statements for clients' signature and assignment to send letter to clients re the mediation and authorization to settle. Follow up needed. .2	0.2	250	50
Service	10/23/20	Debi Pugliese	A103 Draft/revise JD10 Mediation	10-23-20: Draft proposed email to circulate to clients re attendance at the mediation/and or authorization to settle. Draft form template for clients' authorization to settle at mediation. Sent proposed draft email and form template authorizing JNW to settle to Jake to review/approve to send to clients. .5	0.5	250	125
Service	10/26/20	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	10-26-20: Email from/reply to Becca re another email inquiry from client D. Stillman. TC to Mr. Stillman. No Answer. Left him a voicemail message. Follow up email to JNW/Rochelle re next action steps regarding Opt Outs / decision & re questions from our clients. .5	0.5	250	125

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	10/27/20	Debi Pugliese	A103 Draft/revise L190 Other Case Assessment, Development and Administration	10-27-20: Phone call with JNW to discuss the mediation. Draft individual client authorizations for attorney to settle at mediation. Save to matter. Draft email to our each of our clients re the mediation and request for response re attendance/authorization to settle at mediation. Email to Rochelle re the emails sent to the clients re authorization to settle at mediation. 1.8	1.8	250	450
Service	10/28/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	10-28-20: Emails with clients A. Hankins and Philip Uribe re attendance at mediation. TC from client, A. Wadood re the mediation. Review calendar and mediation deadlines. Task self to draft mediation brief. Email from/reply to JAMS case manager re pmt of mediation fees and confirmation of list of attendees. Task reminder to JNW to pay mediation fees. TC with Maikel Najib re his questions about the Opt Out. Copied on email from OPC, C. Tran re claims at mediation. Email from client Eric Brown re virtual attendance at mediation. Fwd to JNW to ask if we can accommodate Eric Brown. TC from client Gabriel Batchelder confirming he will attend mediation. Add	3	250	750
Service	10/29/20	Debi Pugliese	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	10-29-20: Email from client Aneesah Wadood re difficulty signing the Authorization to Settle at Mediation form. Copied Rochelle on reply. Copied on email copy Rochelle sent to client. .2	0.2	250	50

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	10/30/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	10-30-20: Emails from JAMS coordinator re pre mediation call with Mr. Grossman. Call scheduled for November 17th AT 10 a.m. Emailed Rochelle to put on JNW's calendar. Email to Rochelle re status on authorization to settle from our clients. TC with JNW re status on authorizations to settle. Email from Alex re potential witness Jeffrey Freed. Add note to CLIO. to client Lillia Hupp re attendance at mediation. No answer. Left detailed voicemail message. Email from / reply to Waneesah Wadood (copied Rochelle). Email from JNW re client Eric Brown attending virtually. Send reply to E. Brown. Follow up with Rochelle and Alex G. re text blast to send to the clients. 1.5	1.5	250	375
Service	10/31/20	Debi Pugliese	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	10-31-20: Email reply from Eric Brown. Email from A. Wadood stating she signed the Authorization to Settle and asked if we rec'd it. Fwd message to Rochelle. .2	0.2	250	50
Service	11/5/20	Alex Guzman	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	Coordinated with Paralegal Pugliese text messages for clients that had information regarding their mediation and their need to sign authorization forms.	0.2	150	30

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	11/5/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	11-5-20. Review client mediation attendance confirmations/authorizations to settle. Draft individual text message scripts and send to Alex to send out. Follow up individual emails sent to each client. Email from/reply to JAMS administrator re our attendees at mediation. Receive copy of Deposit Statement from JAMS. Save to matter. TC from client Lilia Hupp. She asked me to send the docs to her directly. She will sign and scan return them to me. Email from/reply to Alex. Fwd email to Rochelle re client, K. Reardon, who needs form resent to her. Follow up email from/reply to Rochelle re Lilia Hupp. Review Garcia v. Gallagher Bassett class action docket on SB	2.6	250	650
Service	11/6/20	Meghan Higday	Sent Email	Discuss information needed prior to mediation. Draft email requesting information and send to all plaintiff's.	0.6	500	300
Service	11/6/20	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Update client file re Notices of Withdrawal of Counsel. Correspondence with Debi re same.	0.5	150	75
Service	11/10/20	Meghan Higday	A104 Review/analyze L190 Other Case Assessment, Development and Administration	Review damages calculations by Paralegal Pugliese for accuracy.	1.2	500	600

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	11/6/20	Debi Pugliese	A111 Other JD10 Mediation	11-6-20: TC with JNW re mediation, issues and claims to further refine. Review file notes and claims and email Meghan re data to put together. TC with Meghan re data analysis and what we need to know. Follow up email to clients requesting copies of their paystubs. Further email responses from clients M. Middleton and P. Uribe. Update client mediation attendance log. Continue reviewing case research in preparation for mediation brief. Draft email to JNW/Meghan re Negri opinion. Email to OPC and request copies of our clients' paystubs. Emails and questions from Alexis re notices of attorney withdrawals received. Review and reply to Alexis	3.2	250	800
Service	11/9/20	Debi Pugliese	A111 Other JD10 Mediation	11-9-20: Email reply from OPC re our request for pay stubs. Follow up emails to JNW. TC to J. Freed to discuss Defendant's salary / compensation practices. TC to confer with JNW re claims. Work on damages for individual claims, individual PAGA claims and the PAGA Aggrieved Employees' PAGA damages. Fwd to Meghan to review calculations. Work on mediation brief. 6.0	6	250	1500
Service	11/10/20	Debi Pugliese	A103 Draft/revise JD10 Mediation	11-10-20: Email from / reply to Meghan re her review of the damages calculations. Work on mediation brief. Submit to JNW for review. 12.0	12	250	3000
Service	11/11/20	James Chase	A104 Review/analyze JD10 Mediation	Review and analyze Mediator's policy re cancellation, etc. Email correspondence to Attorney Whitehead and Paralegal Pugliese re same.	0.2	150	30

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	11/11/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	11-11-20: Email from / reply to Shawna O'Donnell, JAMS claims manager re pre mediation TC with mediator, Grossman. Check JNW's calendar and email reply to Shawna confirming JNW availability for Nov. 17th at 9 a.m. Further revise exemption analysis in the draft mediation brief. Send v2 of Draft mediation brief to JNW for review. TC with JNW re potential pre-mediation settlement discussions in progress. Emails with WEL team re refund of the mediation fees paid. Email fyi to Rochelle to be prepared to notify clients of cancelled mediation of matter settles. 1.2	1.2	250	300
Service	11/12/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	11-12-20: Copied on email from Blumenthal firm. Email to JNW re our case, mediation and arbitration, JPA. Add contacts group for the Blumenthal attorneys. TC with JNW. Review JNW's calendar for tomorrow. Send email to OPC, C. Tran re global negotiations and request availability for a TC with JNW tomorrow. .7	0.7	250	175
Service	11/13/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	11-13-20: Receive email from client, Angela Hankins discussing OT she works and non-reimbursement for cell phone use and attached pay stubs. Reply to client and save docs to matter. Receive email from A. Wadood stating she cannot personally attend Nov. 18, 2020 mediation. Look up Joan Fife. Email Jake re her position at OPC's San Francisco office. TC with JNW re mediation. Email to AJ Bhowmik and Blumenthal attorneys re availability for a TC with JNW on Monday morning. .6	0.6	250	150

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	11/16/20	Debi Pugliese	A111 Other JD10 Mediation	11-16-20: Email response from AJ Bhowmik, at Blumenthal re TC with JNW. Add to JNW's calendar. Email from/ reply to Alexis re mediation. Email from JNW re further revision to the mediation brief. Receive paystubs from client, Gabriel Batchelder. Save to the matter. Review the Garcia mediation brief and Exhibits. Work on revisions to individual damages logs. Work on further revisions to the mediation brief. Email to/reply from client Philip Uribe. TC with JNW re mediation. Email to the clients who intent to participate in mediation re pre-mediation zoom meeting with JNW. Email to Rochelle requesting she send out the pre-mediation meeting Zoom invites.	6.9	250	1725
Service	11/17/20	Debi Pugliese	A108 Communicate (other external) JD10 Mediation	11-17-20: Email from JNW and Blumenthal counsel asking about mediation login information. Send email to Shawna at JAMS and ask for mediation login info. Reply from Shawna. Receive email from Shawna with the mediation login and password for tomorrow's mediation. Save to the Mediation folder in the matter. Remind JNW about Pre Mediation Zoom Mtg with clients. .2	0.2	250	50
Service	11/18/20	Alex Guzman	A111 Other L190 Other Case Assessment, Development and Administration	Identify previous plaintiff information regarding the class action and transfer client information to Legal Assistant Banfield for follow up calls and email correspondence.	0.3	150	45
Service	11/18/20	Alex Guzman	A111 Other L190 Other Case Assessment, Development and Administration	Draft and create 3 text campaigns for Gallagher Basset Plaintiffs, text scripts emailed to attorney Whitehead for final approval.	0.8	150	120

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	11/18/20	Alexis Banfield	Phone Call	Telephone conference with PCs re contingency agreements. Left voicemails and sent follow up emails.	0.5	150	75
Service	11/18/20	Debi Pugliese	A111 Other JD10 Mediation	11-18-20: Per email from JNW, set up email string with clients attending the mediation to facilitate internal communications during the mediation. Monitor follow up emails from clients. Email from JNW re non-settlement and follow up actions. Receive PDF copy of demand for arbitration from Blumenthal firm. Reply sent re AAA vs. JAMS as arbitrator and requested Word version of Arbitration demand. Circulate letter to all GB clients with link to share with former and current colleagues. 1.5	1.5	250	375
Service	11/19/20	Alex Guzman	A111 Other L190 Other Case Assessment, Development and Administration	Export Clients to Gallagher Class action and Follow up call with PC going through the agreement directions	1.5	150	225
Service	11/19/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	11-19-20: Receive email from JNW re new client, Anna Acosta. Send welcome email to A. Acosta identifying myself as the case manager. Prepare Letter of Representation and request for personnel and payroll records for Ms. Acosta. Email Acosta Letter of Rep to Ms. Tran and request copies of arbitration agreements for all plaintiffs and clients, Riordan, Batchelder, Hankins, and Acosta. TC with Alex re additional newly engaged client T. Meraz-Pilan Manage. Download new client's intake forms and contingency agreements and update the GB client log sheet with new clients' information. Draft letter of rep, request for records for Tawana Rose Meraz-Pilana-	3.9	250	975

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	11/20/20	Debi Pugliese	A103 Draft/revise L190 Other Case Assessment, Development and Administration	11-20-20: Download and review AAA arbitration rules. Drafted and emailed letters of rep for Tweana Rose Meraz Pilana-Manage, Angela Hankins, Gabriel Batchelder, and Kely Riordan to OPC. Updated client log sheet and calendared Defendant's response deadlines in Clio. 1.3	1.3	250	325
Service	11/24/20	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Review and analyze special interrogatories, deposition notices, requests for production of documents, a proof of personal service by messenger, and a letter from OPC. Update client file re same.	0.4	150	60
Service	11/23/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	11-23-20: Receive and review written discovery and notices of deposition from GB. Calendar GB's notices of deposition of clients L. Hupp, P. Uribe and Eric Brown and calculate and calendar written discovery response deadlines. Review Jake's calendar and discuss potential conflicts on his calendar. Email L. Hupp, Uribe and Brown and ask if they are available on the noticed dates of their depositions. Multiple emails with Mr. Uribe re deposition notice. Create discovery and deposition tab on the GB client log sheet to track depositions and discovery responses. Email to OPC with proposed counter date for Deposition of P. Uribe (Feb. 12, 2021). TC from client Eric Brown. Emailed	2.5	250	625

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	11/24/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	11-24-20: Follow up email from / reply to P. Uribe with questions re written discovery and documents. Email to/reply from JNW re discovery responses. Email to K. Begalla re GB discovery responses. Prepare and send K. Begalla skeletal template to use in drafting the discovery responses. Ask Rochelle to provide K. Begalla access to the Hupp v. GB matter. Email from client A. Wadood with email referral to PC "Tracey". Follow up emails & TC with Alex G. re new PCs and JNW's current instructions. Add various notes re client communications to Clio. .8	0.8	250	200
Service	11/27/20	Debi Pugliese	A103 Draft/revise L210 Pleadings	11-27-20: Work on draft Demand for Arbitration for Lilia Hupp. 2.0	2	250	500
Service	12/3/20	Alex Guzman	A111 Other L190 Other Case Assessment, Development and Administration	Draft and Send Mass Text via heyMarket for Opt Out statements.	0.3	150	45
Service	12/4/20	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Input JAMS mediation fee re Joel Grossman Esq.	0.2	150	30
Service	11/30/20	Debi Pugliese	A103 Draft/revise L210 Pleadings	11-30-20: Receive, review and further revise K. Begalla's draft shell discovery responses for Plaintiffs. Continue working on Hupp's Draft demand for Arbitration. 3.0	3	250	750

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	12/1/20	Debi Pugliese	A111 Other L310 Written Discovery	12-1-20: Follow up email to client L. Hupp asking her to confirm her availability for her deposition. Reply from client deposition and her discovery responses. Sent Ms. Hupp Verification to sign and return with her discovery responses. Email to OPC re moving L. Hupp's start time to 11 a.m. to accommodate JNW's earlier hrg schedule. Receive Amended Ntc of Deposition for P. Uribe from OPC. Forward Amended Ntc of Depo to client P. Uribe with copies of Verifications to sign and return with his discovery responses. Email client Eric Brown Verifications to date and sign to accompany his discovery responses. Update Depo/Discovery log sheet. Receive and download and	2.6	250	650
Service	12/2/20	Debi Pugliese	A104 Review/analyze JF20 Obtaining and Reviewing Documents	12-2-20; Receive additional documents from client L. Hupp. Review and determine there may be duplicates. Fwd documents to Alexis and request review and extraction of duplicates prior to bate stamping for the response to RFPD-Set One for Ms. Hupp. Reply from Alexis. .3	0.3	250	75
Service	12/3/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	12-3-20: Receive and review JAMS statement for mediator Grossman. Review expenses in CLIO to make sure expense was entered. Email to/reply from Alexis re disparity in the fee on the statement and the amount entered in the expense entry. Reply from Alexis explaining additional \$111 fee. Send information for AJ at the Blumenthal firm to Rochelle. .4	0.4	250	100

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	12/7/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	12-7-20: Review claims in mediation brief. Review and revise Gallagher Bassett potential client Intake Form. Send email to JNW/Alex G. letting them know the intake form has been revised. Email from JNW re mediator trying to encourage settlement. Add Blumenthal firm and AK Bhowmik to Clio and add as related co-counsel to the GB matter. Check file documents for clients' consent signatures on the JPA. Email to/ reply from Rochelle re our clients' consent signatures on the JPA with the Blumenthal firm. 1.4	1.4	250	350
Service	12/9/20	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Bate stamp discovery documents re L.Hupp. Update client file re same.	0.3	150	45
Service	12/9/20	Alexis Banfield	A103 Draft/revise L140 Document/File Management	Reorganize client's documents and redo bate stamps. Correspondence with Paralegal Pugliese re same.	0.4	150	60
Service	12/9/20	Debi Pugliese	A111 Other L310 Written Discovery	12-9-20: Receive bate stamped documents for L. Hupp RFPD document production from Alexis. Review and redact confidential portions. Send redacted updated document back to Alexis for further updated bate stamp nos. Receive and review finalized re-bate stamped documents from Alexis. Rename as "Final" in the matter due to duplicate file names. .6	0.6	250	150

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	12/10/20	Debi Pugliese	A103 Draft/revise L310 Written Discovery	12-10-20: Work on drafting objections to SPROGS for clients, Hupp, Brown and Uribe's responses. Sent email reminders to clients Hupp, Brown and Uribe re their discovery response and Verifications. Email response from Ms. Hupp. Per email from JNW re potential settlement among the parties, sent follow up email to clients Hupp, Brown and Uribe and told them not to work on their discovery responses unless or until further notified by us. Review Judge Wests' recommended settlement terms and Defendant's acceptance based on specified terms. Send comments and questions to JNW re the proposed terms of settlement. 3.0	3	250	750
Service	12/17/20	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	12-17-20: Email from/reply to client, P. Uribe re case status. TC with JNW re status on settlement and requesting extension on plaintiffs' discovery responses. Draft email to OPC, C. Tran and request 30-day extension on discovery responses pending settlement negotiations. Courtesy extension granted by OPC. Update new discovery response deadline on the Calendar in CLIO. Add Joan Fife as a contact in Clio and link her as a related contact (OPC) to the matter. .5	0.5	250	125
Service	12/22/20	Debi Pugliese	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	12-22-20: Email from/reply to client Philip Uribe's case status inquiry. .1	0.1	250	25

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	1/5/21	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	1-5-21: Email from/reply to JNW request re clients' workweeks. Copy Blumenthal counsel. Per further email request from AJ at Blumenthal recalculate the number of workweeks our plaintiffs worked during the four-year class period. Created new table with calculations and sent the data to Blumenthal team. .6	0.6	250	150
Service	1/6/21	Debi Pugliese	A104 Review/analyze JD20 Other Settlement Matters	1-6-21: Receive and review redline and clean drafts of the MOU with Exhibit. Save to the matter. .2	0.2	250	50
Service	1/11/21	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	1-11-21: Email to OPC requesting an additional two week extension to Plaintiffs' discovery responses. Follow up email by JNW requesting indefinite extension while settlement activities continue. Calendared new extended discovery response deadline for Plaintiff's two more months. .2	0.2	250	50
Service	1/12/21	Debi Pugliese	A103 Draft/revise L250 Other Written Motions and Submissions	1-12-21: Review 9-4-20 Minute Order re Jan. 22, 2021 CMC. Review Court Docket to see if CMC still on calendar. Work on Draft Joint Case Management Statement. Send draft to OPC for review and comment. 1.2	1.2	250	300
Service	1/13/21	Debi Pugliese	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	1-13-21: Multiple emails with client Philip Uribe asking about status of case and his prior noticed deposition. Status update provided. TC from client Tawana Rose Meraz Pilana Menage re case status. Note to Clio. .4	0.4	250	100
Service	1/14/21	Debi Pugliese	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	1-14-21: Sent Hupp clients group case status update. Replies from a few clients re status update. .4	0.4	250	100
Service	1/19/21	Alexis Banfield	A103 Draft/revise L140 Document/File Management	Prepare proof of service re Joint Case Management Statement. Update client file re same.	0.3	150	45

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	1/19/21	Alexis Banfield	A103 Draft/revise L140 Document/File Management	Prepare proof of service re Notice of Association of Counsel. Update client file re same.	0.3	150	45
Service	1/19/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	File Proof of Service and Joint Case Management Statement via One Legal. Review confirmation of filing, update client file re same.	0.3	150	45
Service	1/19/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	File Proof of Service and Notice of Association of Counsel via One Legal. Review confirmation of filing, update client file re same.	0.3	150	45
Service	1/20/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Review One Legal invoice re Joint Statement and Proof of Service. Add expense in Clio and update client file re same.	0.2	150	30
Service	1/20/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Review One Legal invoice re notice of association of attorney and proof of service. Update file re same.	0.2	150	30
Service	1/20/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Review Conformed copies of Notice of Association of Counsel and Proof of Service. Update client file re same.	0.2	150	30
Service	1/18/21	Debi Pugliese	A103 Draft/revise L250 Other Written Motions and Submissions	1-18-21. Receive and review OPC's redlines to the Joint case status report. Review 8-11-20 meet and confer emails and JNW instruction to cancel service of the FAC. Email to JNW re clarification in the joint status report. Copied on JNW's v2 of draft joint case status report. Per JNW, sent drafts (v1 and v2) of the Joint report to AJ at Blumenthal firm and ask if they want us to associate them in as counsel in the Hupp matter now. Per reply from AJ, draft Ntc of Association of Counsel and send it to AJ and Blumenthal attorneys on the Garcia matter to review. Finalize the Joint case status report per approval of opposing counsel. Save to matter. Send copy to Alexis to file and serve tomorrow. Per	1.8	250	450

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	1/19/21	Debi Pugliese	A103 Draft/revise L250 Other Written Motions and Submissions	1-19-21: Multiple emails/replies to Alexis re service list for the Joint Status Conference Report and Ntc of Association of Counsel. Multiple instructions for revisions/correction. Ask Alexis to add Blumenthal attorneys listed in Ntc of Association of Counsel to the matter in Clio. TC with Alexis. Revise the draft Ntc of Association of Counsel and Joint Case Management statement and the proofs of service. Save to matter; send final revised copies to Alexis to sign, finalize and serve docs. Receive via FWD email from JNW opposing counsel's redline comments to draft MOU for Garcia/Hupp v GB. Save to matter. Receive and review Court Order continuing the	2	250	500
Service	1/20/21	Debi Pugliese	A111 Other JD20 Other Settlement Matters	1-20-21: Receive MOU and request by JNW to circulate to clients for signature. Draft and send group email to clients re the Settlement Agreement. Email questions from/reply to Rochelle re MOU plaintiffs and Zoom invite to clients. TCs with Meghan/Alex re client who leaked the email to outside non-clients. TC with JNW re communications with clients and the MOU. Sent follow up email to clients re confidentiality of attorney client communications and re pending Zoom call invite. Send Meghan copy of MOU and Exhibit A to MOU reflecting workweeks and request calculation of plaintiffs share of settlement proceeds. Add columns to client log sheet for tracking TCs re	2.7	250	675
Service	1/21/21	Meghan Higday	A103 Draft/revise L160 Settlement/Non-Binding ADR	Settlement breakdown by individual client before and after fees and costs taken out.	1.7	500	850
Service	1/21/21	Meghan Higday	A103 Draft/revise L160 Settlement/Non-Binding ADR	Adjust settlement breakdown with accurate attorneys fees and additional PAGA amounts.	1.1	500	550

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	1/22/21	Meghan Higday	Phone Call	Phone call with multiple plaintiffs regarding concerns over settlement.	0.1	500	50
Service	1/21/21	Debi Pugliese	A111 Other JD20 Other Settlement Matters	1-21-20: Email reply to K. Riordan to go ahead and sign the MOU as is. Note to matter to correct misspelling of Riordan's name when we file the motion. Review email from Rochelle re status of signed MOUs. Update log sheet. Further email status updates with Rochelle re signatures gathered so far. Task reminder re correction b/f filing of motion. TC from Meghan re costs entered into the matter. Receive and review individual settlement calculations from Meghan. Reply to Meghan re PAGA allocations. Receive and review (v2) of individual settlement allocations including estimated PAGA shares. Phone call from client B. Matsumoto. TC to client,	1.9	250	475
Service	1/22/21	Debi Pugliese	A111 Other JD20 Other Settlement Matters	1-22-21: TC from Alex G. re group email sent to clients for Google reviews. Sent Alex G. link to GB client logsheet. Copied on multiple emails re status of clients' signatures on MOU. Update signature status on client log sheet. Receive/review updated allocation of settlement logs sheet from Meghan. Reply to Meghan re PAGA Aggrieved employees. Copied on email by OPC re estimated workweeks in Exhibit 1 of MOU and confirmation of same for purposes of allocation of settlement funds. .5	0.5	250	125
Service	2/11/21	Alexis Banfield	A103 Draft/revise L140 Document/File Management	Draft proof of service re Notice of Settlement. Forward to Paralegal Pugliese re same.	0.3	150	45
Service	2/11/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	File Notice of Settlement and Proof of Service via One Legal. Review confirmation of filing and update client file re same.	0.2	150	30

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	2/11/21	Alexis Banfield	Sent Email	Serve Notice of Settlement and Proof of Service on Opposing counsel and Co-Counsel. Correspondence with Paralegal Pugliese re same.	0.2	150	30
Service	2/11/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Review One Legal Invoice re Notice of Settlement and Proof of Service. Update client file re same.	0.2	150	30
Service	2/11/21	Debi Pugliese	A103 Draft/revise L250 Other Written Motions and Submissions	2-11-21: Review MOU. Draft Ntc of Settlement; circulate to co-counsel for review/approval. Email to JNW re draft of the SAC per the MOU. Further emails with JNW re draft settlement agreement and the SAC. Email to co-counsel re drafting of the SAC. Follow up emails with JNW re draft Ntc of Settlement. Per JNW instruction, revise notice of settlement and submit to JNW for approval prior to circulation. Per JNW approval and approval of co-counsel, finalize Ntc of settlement and fwd to Alexis to file and serve. Review and approval Alexis' POS. File copy of Complaint and FAC online with LWDA. Receive LWDA confirmations of filings and save to matter.	1.9	250	475
Service	2/18/21	Debi Pugliese	A104 Review/analyze JD20 Other Settlement Matters	-18-21: Receive and review draft Settlement Agreement from co-counsel Kyle Nordrehaug. Save copy of the draft agreement to the matter. .2	0.2	250	50
Service	2/22/21	Debi Pugliese	Received Email	2-22-21: Follow up email from co-counsel Nordrehaug re his draft settlement agreement and approval by JNW. .1	0.1	250	25

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	3/1/21	Debi Pugliese	A107 Communicate (other outside counsel) L190 Other Case Assessment, Development and Administration	3-1-21: Email from/reply to J. Herman re SAC per MOU. Provide co-counsel with link to client log sheet. Follow up email from Rico Ehrmann in co-counsel's office. Email from JNW with draft long form settlement agreement. Save to file. Ask JNW to please fwd Defendant's Jan. 5, 2021 objection to deposition. .5	0.5	250	125
Service	3/2/21	Debi Pugliese	A104 Review/analyze JD20 Other Settlement Matters	3-2-21: Review co-counsel's long form settlement agreement. Draft email to co-counsel K. Nordrhaug and Blumenthal team re misspelling of client, Kelly Riordan's name in the draft long form settlement agreement. .3	0.3	250	75
Service	3/10/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Docket reminder re Joint Status Report.	0.1	150	15
Service	3/11/21	Alexis Banfield	A103 Draft/revise L140 Document/File Management	Draft Proof of Service re Joint Case Management Statement.	0.2	150	30
Service	3/11/21	Alexis Banfield	A103 Draft/revise L140 Document/File Management	Revise Proof of Service re Joint Case Management Statement.	0.2	150	30
Service	3/10/21	Debi Pugliese	A103 Draft/revise L250 Other Written Motions and Submissions	3-10-21: Review calendar in Clio. Email to Meghan re pending CMC and joint statement. Per Meghan reply/request, draft email to OPC and co-counsel regarding the draft proposed long form settlement agreement sent by K. Nordrehaug to OPC on March 1st and the pending March 19, 2021 CMC/Joint Statement. Draft proposed Joint Case Management Statement and submit to Meghan and JNW for review. Per JNW review/reply further revise Draft Joint Case Management Statement. Resubmit to JNW/Meghan for review. 1.4	1.4	250	350

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	3/11/21	Debi Pugliese	A107 (UK) Communicate (Other Party(s)/other outside lawyers) L250 Other Written Motions and Submissions	3-11-21: Review revised POS from Alexis. Request one further revision. Per Meghan email, sent draft Joint Case Management Statement to OPC Tran/Fife for review. .2	0.2	250	50
Service	3/12/21	Alexis Banfield	Received Email	Review reminder re deadline to file Joint Status Report. Correspondence with Attorney Higday re same.	0.1	150	15
Service	3/15/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Review Orange Superior Court Docket re Case Management Conference. Correspondence with Attorney Whitehead re same.	0.2	150	30
Service	3/15/21	Meghan Higday	Received Email	Receive proposed changes to Joint Status Report from opposing counsel. Review and confirm changes.	0.2	500	100
Service	3/15/21	Alexis Banfield	A103 Draft/revise L140 Document/File Management	Revise Proof of Service re Joint Status Report. Correspondence with Attorney Higday and Paralegal Pugliese re same.	0.2	150	30
Service	3/15/21	Meghan Higday	Sent Email	Send email to opposing counsel with finalized Joint Status Report and request discovery extension.	0.2	500	100
Service	3/15/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	File Joint Status Report via One Legal. Update file re confirmation of filing.	0.2	150	30
Service	3/15/21	Alexis Banfield	Sent Email	Serve Joint Status Report via Electronic Service.	0.2	150	30
Service	3/15/21	Alexis Banfield	A111 Other L190 Other Case Assessment, Development and Administration	Correspondence with Attorney Higday re Case Management Conference (March 19, 2021).	0.1	150	15
Service	3/15/21	Meghan Higday		Request 30 day extension for discovery responses while finalizing settlement.	0.2	500	100
Service	3/15/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Review email correspondence re extension of deadline to provide discovery responses. Docket updated deadline.	0.2	150	30
Service	3/17/21	Alexis Banfield	Sent Email	Email correspondence with Attorney Higday re Case Management Conference. (3/19/21)	0.1	150	15
Service	3/17/21	Meghan Higday	Received Email	Email Legal Assistant Banfield to schedule court call for Case Management Conference.	0.1	500	50

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	3/17/21	Alexis Banfield	Sent Email	Email correspondence with Case Manager McFaul re Case Management Conference.	0.1	150	15
Service	3/17/21	Erin McFaul	Hearing	Schedule Attorney Higday's re CMC 3/19. Update file re same.	0.2	0	0
Service	3/17/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Review Minute Order (03/17/2021) re continued status conference. Docket hearing, correspondence with Attorney Higday re same.	0.2	150	30
Service	3/17/21	Erin McFaul	Hearing	Continue CMC Hearing to 7/09/2021. Update file re CourtCall confirmation and invoice.	0.2	0	0
Service	3/15/21	Debi Pugliese	A104 Review/analyze L250 Other Written Motions and Submissions	3-15-21: Receive and review OPC's rl revisions to the Joint Status Report. Email to JNW/Meghan re review; reply to Meghan re extension on our discovery responses and the draft Joint Report. Finalize Joint Report and send to Meghan and JNW. Copied on Meghan's email to OPC requesting further extension of discovery responses. .5	0.5	250	125
Service	3/17/21	Debi Pugliese	A104 Review/analyze L140 Document/File Management	3-17-21: Receive and review Court's Minute Order continuing the March 19, 2021 status conference to July 9, 2021. Added note to CLIO. .1	0.1	250	25
Service	3/24/21	Alexis Banfield	Sent Email	Email correspondence with Co-Counsel re mail from Orange County Superior Court. Correspondence with Attorney Higday re same.	0.2	150	30
Service	3/24/21	Debi Pugliese	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	3-24-21: Status inquiry email from/reply to client Michelle Middleton. Follow up email to Meghan re current case status and settlement agreement and other documents. .3	0.3	250	75

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	3/25/21	Debi Pugliese	Received Email	3-25-21: Copied on email to Caitlin Tran re status of the draft settlement agreement. Copied on Meghan's email to / reply from co-counsel re status on the draft of the SAC. Email from/reply to Rico Ehrman re SAC; send Rico copy of the client spread sheet. .3	0.3	250	75
Service	4/6/21	Debi Pugliese	A104 Review/analyze L210 Pleadings	4-6-21: Email from/reply to Meghan re discovery responses. Receive review revise defendant's March 30, 2021 revisions to the draft settlement agreement. Sent v4 redlines and questions to JNW and co-counsel K. Nordrehaug. Status email inquiry from/reply to client, Eric Brown. Reply email re revisions and questions from K. Nordrehaug. Review draft SAC sent by co-counsel on March 30th. Add minor redline revisions. Send redline and clean copies of v2 of the Draft SAC to co-counsel. Save copies of all drafts to the matter. 2.5	2.5	250	625
Service	4/13/21	Debi Pugliese	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration	4-13-21: Email status inquiry regarding the settlement from & reply to client, Philip Uribe. .2	0.2	250	50
Service	4/16/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Create class action spreadsheet.	0.3	150	45
Service	4/16/21	Meghan Higday	Received Email	Receive settlement agreement and review necessary drafting and filing after signatures. Assign Legal Assistant Banfield to create tracking sheet. Call with Paralegal Pugliese regarding calendaring and drafting due dates and task allocation.	0.5	500	250
Service	4/16/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Research clients' date of birth and update class action spreadsheet re same.	0.3	150	45

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	4/16/21	Meghan Higday	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR	Meeting with Attorney Whitehead regarding next steps for settlement. Review email for clients and assign Legal Assistant Banfield additional tasks for client signatures.	0.3	500	150
Service	4/16/21	Alexis Banfield	Phone Call	Attempt to return clients call, left a voicemail (T Manage)	0.1	150	15
Service	4/16/21	Alexis Banfield	Sent Email	Email Master settlement agreements to clients and send mass email re same.	0.7	150	105
Service	4/16/21	Meghan Higday	Sent Email	Receive questions from clients via email regarding settlement agreement and respond to same.	0.2	500	100
Service	4/19/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Send W9 tax form to clients via PandDoc. Update file re same.	0.7	150	105
Service	4/19/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Send out W9 Tax Forms for Signing. Correspondence with numerous clients re issues.	1.5	150	225
Service	4/19/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Review numerous client documents. Update file re same.	0.2	150	30
Service	4/20/21	Alexis Banfield	Phone Call	Telephone conferences with numerous clients re W-9 Tax Form. Update class action spreadsheet and file re same.	0.7	150	105
Service	4/20/21	Meghan Higday	Sent Email	Send email to opposing counsel requesting extension on discovery.	0.2	500	100
Service	4/20/21	Alexis Banfield	Sent Email	Email correspondence with client re W9 tax form and address (K. Riordan).	0.3	150	45

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	4/16/21	Debi Pugliese	A103 Draft/revise JD20 Other Settlement Matters	4-16-21: Review and review draft individual settlement agreement from co-counsel. Email to co-counsel re Meghan Higday. Send review notes to JNW/ Meghan. Create draft individual settlement agreement for male plaintiffs. Further emails with Meghan and Alexis re form of settlement for non-over 40 aged plaintiffs with re to the Older Workers Provision and other settlement matters. Per JNW reply, draft email to co-counsel re review of the individual settlement agreement and pending templates after we have a finalize agreement. Fwd email inquiry from plaintiff, K. Riordan to Meghan. Email from Meghan re the amounts of individual	1.8	250	450
Service	4/19/21	Debi Pugliese	A111 Other L190 Other Case Assessment, Development and Administration	4-19-21: Email from/ reply to co-counsel K. Nordrehaug re the proposed liquidated damages in the individual settlement agreements. Fwd Ruby messages from clients Philip Uribe and Eric Brown re difficulty signing the documents. Email reply from Alexis re issue resolved. Email from Alexis re msg from client. .4	0.4	250	100
Service	4/20/21	Debi Pugliese	A104 Review/analyze L210 Pleadings	4-20-21: Receive and review co-counsel's draft SAC. Review and reply to JNW with comments. .5	0.5	250	125
Service	4/21/21	Debi Pugliese	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration	4-21-21: Reply to email from Alexis re explaining status on the pending settlement in response to client inquiries. .2	0.2	250	50
Service	4/23/21	Alexis Banfield	Received Email	Review email correspondence from client re new address. Update class action spreadsheet re same. (K. Riordan)	0.1	150	15
Service	4/26/21	Alexis Banfield	Phone Call	Attempt to reach client we settlement agreement and W9 tax form. (G. Batchelder) Sent text message re same.	0.1	150	15

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	4/27/21	Alexis Banfield	Phone Call	Telephone conference with client re W9 tax form and settlement agreements. Resend both documents to him via PandaDoc.	0.3	150	45
Service	4/27/21	Meghan Higday	A103 Draft/revise L160 Settlement/Non-Binding ADR	Draft individual settlement/attorneys' fees allocations per client table. Call with Paralegal Pugliese going over individual and master settlement agreements. Review MOU and settlement agreement. Review and revise calculations.	2.8	500	1400
Service	4/26/21	Debi Pugliese	A104 Review/analyze JD20 Other Settlement Matters	4-26-21: Email from co-counsel. Email to Alexis and Meghan requesting status of our clients' signatures on the PAGA settlement agreement. Email from co-counsel re proposed revisions to the individual settlement agreement. Draft revision to proposed section 8.6 re liquidated damages. Email our proposed revisions to opposing counsel. Review the draft PAGA Settlement Agreement and the draft individual settlement agreement. Email to Meghan re. draft of Exhibit 1 – the individual plaintiffs' allocations. Email to Co-counsel Nordrehaug re same. Follow up emails with Meghan. Receive and review Exhibit 2 (the Notice of Settlement draft) from co-	1.5	250	375
Service	4/27/21	Debi Pugliese	A111 Other JD20 Other Settlement Matters	4-27-21: Send proposed redlined revisions to Exhibit 2 (the Notice of PAGA settlement) to co-counsel, JNW and Meghan and question re quote from Simpluris. Email reply from Meghan re Simpluris. TC from Meghan re draft/calculations of the individual settlements. Discuss Exhibits. Send Meghan copy of Exhibit 1 to the MOU which shows the workweeks. .6	0.6	250	150

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	4/28/21	Alexis Banfield	Phone Call	Attempt to reach client multiple times (G. Batchelder). Left voicemail. Resend W9 tax form.	0.3	150	45
Service	4/28/21	Meghan Higday	Sent Email	Review individual damages breakdown sheets and email to co-counsel.	0.2	500	100
Service	4/28/21	Alexis Banfield	Phone Call	Telephone conference with client re settlement agreement and W9 tax form (G. Batchelder)	0.3	150	45
Service	4/28/21	Debi Pugliese	A111 Other JD20 Other Settlement Matters	4-28-21: TC from Meghan re draft table of individual settlement calculations. Copied on email by Meghan to co-counsel with attached individual settlement calculations/allocations. Receive, review and download copy of co-counsel Nordrhaug's further revised Exhibit 2 (the draft Ntc of Settlement) that he emailed to OPC. Save copy to the matter. .3	0.3	250	75
Service	5/4/21	Alexis Banfield	Received Email	Email correspondence from Paralegal Pugliese re status of PAGA settlement agreements.	0.1	150	15
Service	5/4/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Combine PAGA Settlement agreements into one pdf file. Update file re same and forward to Paralegal Pugliese.	0.3	150	45
Service	5/4/21	Debi Pugliese	A111 Other JD20 Other Settlement Matters	5-4-21: Emails from/replies to co-counsel K. Nordrehaug re client's signatures on the PAGA settlement agreement. Emails with Alexis re status of client's signatures. Receive compiled client signatures from Alexis. Fwd to co-counsel Nordrehaug. .4	0.4	250	100
Service	5/5/21	Debi Pugliese	A107 Communicate (other outside counsel) JD20 Other Settlement Matters	5-5-21: Email from co-counsel requesting WEL's signature on the PAGA settlement agreement. Sign, date, save to matter and email copy to Mr. Nordrehaug. .2	0.2	250	50

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	5/6/21	Debi Pugliese	A111 Other JD20 Other Settlement Matters	5-6-21: Email from/reply to co-counsel K. Nordrehaug. Email from Meghan. Msg to Meghan re the Exhibit no 2 reference in the PAGA settlement agreement. Organize the documents that pertain to the PAGA and individual settlement drafts in the matter Message to/reply from Meghan re the exhibits to the PAGA settlement agreement. Send email to co-counsel K. Nordrehaug and request clarification re Exhibit 2 to the PAGA settlement agreement. Receive and review Defendant's signatures to the PAGA Settlement Agreement. Fwd to Meghan/Alexis. Email to all counsel asking them to please include Meghan H. on all email communications. .8	0.8	250	200
Service	5/7/21	Debi Pugliese	A103 Draft/revise JD20 Other Settlement Matters	5-7-21: Teed up the individual settlement agreements for each of the Hupp clients. Organize by gender/over or under 40/and current or former employees. Save in subfolders to the drive. Email to Meghan letting her know teed up individual settlements are ready for the settlement calculations. Follow up question from/reply to Meghan re the categorization of the clients over/under 40, etc. 2.2	2.2	250	550
Service	5/10/21	Meghan Higday	A111 Other L190 Other Case Assessment, Development and Administration	Re: Hupp / Garcia v. Gallagher Bassett - Amended PAGA Notice	0.2	500	100
Service	5/11/21	Meghan Higday	Received Email	Receive email from co-counsel, respond with calculations breakdown.	0.3	500	150
Service	5/11/21	Meghan Higday	A103 Draft/revise L160 Settlement/Non-Binding ADR	Receive email from co-counsel, respond to same explaining calculations in further detail.	0.6	500	300

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	5/11/21	Meghan Higday	A103 Draft/revise L160 Settlement/Non-Binding ADR	Receive email from co-counsel respond to same. Meeting with Jacob regarding settlement calculations. Revise settlement table. Email to co-counsel.	1.2	500	600
Service	5/12/21	Meghan Higday	Received Email	Receive email from co-counsel, review settlement table, and respond to same.	0.2	500	100
Service	5/10/21	Debi Pugliese	A111 Other JD20 Other Settlement Matters	5-10-21: Email from Caitlin Tran with comments on co-counsel's draft SAC and joint stipulation for same. Email from Andrew Ronan at Bamlaw (co counsel's office) with inquiry re SAC and Amended PAGA notice. Reply and attach documents with have filed with the LWDA / confirmations for same to Andrew Ronan. Email from Nordrehaug to OPC with finalized fully executed copy of the PAGA settlement with all signatures and exhibits attached. Save copy to the matter. .5	0.5	250	125
Service	5/11/21	Debi Pugliese	A111 Other JD20 Other Settlement Matters	5-11-21: Multiple emails from/replies to co-counsel re the draft motion for approval of PAGA settlement and draft proposed order. Review and send back comment to co-counsel. Receive draft SAC and proposed draft Joint Stipulation for filing the SAC. Follow up TC with Meghan re her calculations and allocation of attorneys' fees for the individual settlement agreements. Email from JNW re incorrect address for WEL in the caption page of the draft motion for approval of PAGA settlement. Redline correct caption pages to send to co-counsel and OPC tomorrow morning. .8	0.8	250	200

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	5/12/21	Debi Pugliese	A111 Other JD20 Other Settlement Matters	5-12-21: Email wel rl corrections for WEL address to all parties. Further follow up emails from co-counsel K. Nordrehaug re the proposed table breakdown allocation of the individual settlement payments. TC with Meghan. Receive update allocation table for individual settlements from Meghan. Email copy of the updated proposed table of allocation of individual settlement payments to OPC for review and approval. .5	0.5	250	125
Service	5/13/21	Debi Pugliese	A103 Draft/revise JD20 Other Settlement Matters	5-13-21: Begin working on draft Declaration of JNW ISO of the Motion for Approval of PAGA settlement. Receive / review further redlines from OPC to the draft SAC and Joint Stipulation. Emails by co-counsel approving and attached final drafts of SAC and Joint Stip. Receive email from Rico Ehrman (co-counsel) asking me to follow up on filing of SAC/Joint Stip in the Hupp action. Ask Meghan to have Alexis update her billing rate in her time entries for our summary of fees and costs. Email to/reply from JNW re Armamino survey. Check Armamino website and current survey and rates. 2.8	2.8	250	700
Service	5/14/21	Alexis Banfield	A103 Draft/revise L140 Document/File Management	Draft proof of service re stipulation and proposed order. Update file re same. Forward to Paralegal Pugliese for review. 0.2	0.2	150	30
Service	5/14/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Serve Joint Stipulation on opposing counsel. Correspondence with Attorney Higday and Paralegal Pugliese re same. 0.2	0.2	150	30
Service	5/14/21	Alexis Banfield	Sent Mail	Serve second amended PAGA notice via certified mail. 0.3	0.3	150	45

Type	Date	User	Activity category	Description	Hours	Rate (\$)	Billable (\$)
Service	5/17/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Review One Legal invoice re stipulation filing. Update file re same.	0.2	150	30
Service	5/17/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Review conformed copy of Stipulation and Proposed Order for Leave for Plaintiffs to File Second Amended Representative Action Complaint. Update file re same.	0.1	150	15
Service	5/17/21	Alexis Banfield	A110 Manage data/files L140 Document/File Management	Forward conformed copy Stipulation and Proposed Order for Leave for Plaintiffs to File Second Amended Representative Action Complaint to Mr. Ehrmann and Mr. Ronan.	0.2	150	30
Service	5/17/21	Meghan Higday	Received Email	Receive email from client for update, respond to same.	0.1	500	50
Service	5/17/21	Meghan Higday	Received Email	Receive email from opposing counsel. Receive email from Paralegal Pugliese, Receive email from legal assistant Banfield with filed documents.	0.1	500	50
Service	5/19/21	Meghan Higday	Received Email	Receive email from Legal Assistant Banfield regarding task, respond to same.	0.1	500	50
						Services Subtotal:	\$64,430

WHITEHEAD EMPLOYMENT LAW EXPENSE SUMMARY

Lillia Hupp, et al. v. Arthur J. Gallagher Service Company, et al.

Date	UTBMS expense code	Description	Quantity	Rate (\$)	Total (\$)	User
4/8/20	E124 Other	Service re rep/lit-hold letter	1	15.65	15.65	Regina Medina
4/10/20	E124 Other	PAGA filing fee	1	75	75	Regina Medina
6/9/20	E124 Other	Serve Amended PAGA ntc via certified mail	5	7.05	35.25	Regina Medina
6/18/20	E124 Other	Postage re Eric Brown Rep/Lit-Hold letter	1	1.4	1.4	Regina Medina
6/26/20	E124 Other	Mail serve Rep/Lit-Hold letter re Philip Uribe	5	1.2	6	Regina Medina
6/29/20	E124 Other	Fee re filing of Complaint, Civil Case Cover Sheet, Summons Issued and Filed	1	1494.56	1494.56	Regina Medina
7/29/20	E124 Other	Fee re filing of Amended Complaint	1	12.2	12.2	Regina Medina
8/5/20	X111 Online Legal Research	REIMBURSEMENT TO D. PUGLIESE CREDIT CARD PAYMENT FOR COURT FEES FOR COPIES OF DOCUMENTS DOWNLOADED FROM THE GARCIA CLASS ACTION FROM SAN BERNARDINO SUP. COURT WEBSITE.	1	0	0	Debi Pugliese
9/8/20	E124 Other	Filing fee re Notice of CMC	1	12.2	12.2	Regina Medina
11/6/20	E121 Arbitrators/mediators	Payment - JAMS, Inc.	1	5061.14	5061.14	Alexis Banfield
1/20/21	E124 Other	Court Filing - Joint Statement, Proof of Service - One Legal	1	14.25	14.25	Alexis Banfield
1/20/21	E124 Other	Court Filing - Notice of Association of Attorney, Proof of Service - One Legal	1	14.25	14.25	Alexis Banfield
1/21/21	E124 Other	Administration costs for case management subscriptions.	1	923.08	923.08	Meghan Higday
2/11/21	E124 Other	Court Filing - Notice of Settlement and Proof of Service - One Legal	1	14.25	14.25	Alexis Banfield
3/15/21	E124 Other	Court Filing - Joint Status Report and Proof of Service - One Legal	1	67.5	67.5	Alexis Banfield
3/17/21	E124 Other	Court Appearance - CMC 3/19 - CourtCall	1	94	94	Erin McFaul
4/27/21	E124 Other	Court Filing - Resubmitted Joint Status Report - One Legal	1	69.49	69.49	Alexis Banfield
5/14/21	E124 Other	Service - 2nd Amended PAGA Notice - Certified Mail - Stamps.com	1	29.38	29.38	Alexis Banfield
5/17/21	E124 Other	Court Filing -- Stipulation -- One Legal	1	35.26	35.26	Alexis Banfield
			TOTAL COSTS		\$7,974.86	