

Larry W. Lee (State Bar No. 228175)
Max W. Gavron (State Bar No. 291697)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile
lwlee@diversitylaw.com
mgavron@diversitylaw.com

Attorneys for Plaintiff and Class Members

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

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

Plaintiff,

vs.

DEACON CONSTRUCTION, LLC, an
Oregon limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 20CV367327

[Assigned for all purposes to the Hon. Charles F.
Adams, Dept. 7]

**DECLARATION OF MAX W. GAVRON IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: February 6, 2025

Time: 1:30 P.M.

Dept.: 7

Action Filed: June 17, 2020

Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

I, Max W. Gavron, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Diversity Law Group, counsel of record for Plaintiff James Abernathy ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. The proposed settlement meets the criteria for this Court to grant final approval of this matter on a class-wide basis, as the settlement is fair, adequate, and reasonable.

3. The Joint Stipulation of Class Action and PAGA Settlement (“Agreement” or “Settlement Agreement”) was the product of arm’s length negotiations between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed. Plaintiff’s counsel engaged in extensive factual investigation before settling. The Parties also participated in two separate full days of mediation with the Honorable Richard M. Silver (Ret.) and the Honorable Ronald M. Sabraw (Ret.). The Parties conducted formal and informal discovery prior to mediation, including reviewing the production of class data, as well as Plaintiff’s personnel file, employee handbook, meal period policies, and copies of wage statements to putative Class Members. The Parties also took the depositions of Plaintiff and Defendant’s Persons Most Qualified on various topics. The parties also deposed several putative class members in conjunction with the briefing on Plaintiff’s Motion for Class Certification. The exchange of information allowed Plaintiff’s counsel to analyze liability and exposure.

4. I have spent significant time researching and pursuing the claims that have been alleged in this action. Based on my independent investigation and evaluation, I am of the opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Class Members in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The settlement was negotiated at arm's length and was facilitated by an experienced and neutral mediator. Thus, this settlement should be granted final approval.

5. The Court preliminary approved this settlement on July 26, 2024, directing

1 distribution of the Notice of Class Action Settlement ("Class Notice") and scheduling the hearing
2 for final approval of the settlement (the "Preliminary Approval Order"). The Court subsequently
3 rescheduled the final fairness hearing to February 6, 2025.

4 6. There were no objections to the amount of attorneys' fees or litigation costs that
5 Plaintiff's counsel seeks in this case and for which Plaintiff asks the Court for final approval.

6 7. Any remaining monies from uncashed settlement checks will be transmitted to the
7 California State Controller's Unclaimed Property Fund in the name of the individual(s) to whom
8 the funds relate.

9 **ATTORNEY EXPERIENCE**

10 8. I am one of the primary attorneys on this matter. My qualifications are as follows:
11 I received a full-tuition scholarship, and graduated from Southwestern Law School in 2013,
12 magna cum laude. I was in the top 5% of my class. During my time at Southwestern, I was a
13 Notes and Comments Editor on the Southwestern Law Review. I also received awards for
14 achieving the highest grade in my class in several courses. In 2012, I was a full-time extern, at
15 the United States District Court for the Central District. Immediately after law school, I taught
16 several courses at Southwestern, including Principles of Legal Analysis and Legal Methods. I
17 taught those courses for approximately four years.

18 9. I practiced civil litigation at Haight Brown & Bonesteel LLP from approximately
19 September 2013, through January 2016. I was third chair in a federal court jury trial that resulted
20 in a defense verdict in our client's favor on a \$21 million commercial breach of contract dispute.
21 I also regularly litigated cases across the civil litigation spectrum, including employment matters.

22 10. From February 2016, through Fall 2017, I practiced at the international law firm
23 of Arnold & Porter, which had recently merged with Kaye Scholer, LLP. I defended Fortune 50
24 companies in Multi-District Litigation primarily in the product liability sphere. I also
25 successfully drafted an appellate brief in the Ninth Circuit resulting in the reversal of a summary
26 judgment decision regarding trade secret issues, in addition to working in several other practice
27 groups.

28 11. From September 2017, through September 2018, I served as a law clerk to a

1 Judge sitting on the United States District Court, Central District of California. I regularly
2 prepared bench memoranda, on cases involving all types of civil litigation, including regularly
3 working on wage and hour class actions.

4 12. I am currently an attorney at the law firm Diversity Law Group, P.C., an
5 employment law firm that has handled numerous wage and hour class and individual actions, on
6 both plaintiff and defense sides. My current practice focuses on employment matters involving
7 both class actions, and single plaintiffs. The firm currently has cases in the Los Angeles Superior
8 Courts, the Orange County Superior Courts, the San Diego County Superior Courts, and the
9 United States District Courts for the Central, Northern, and Eastern Districts of California. I am
10 currently handling, or have handled, numerous wage and hour class action lawsuits with the firm,
11 including, but not limited to: *Weybrew v. BEI Construction*, Solano County Superior Court Case
12 No. FCS055658 (January 14, 2022), *In re See's Candies Wage and Hour Cases*, Case No.
13 JCCP5004 (March 30, 2022), Los Angeles Superior Court, *Pevey v. Lumber City Corp*, San
14 Bernardino County Superior Court Case No. CIVDS2010240 (May 2, 2022), *Ross v Stater Bros.*
15 *Markets*, San Bernardino County Superior Court Case No. CIVDS1902518 (September 8, 2022),
16 and *Schneider v. Amazon Retail LLC*, Los Angeles County Superior Court Case No.
17 21STCV26226 (December 1, 2022); *James v RADC Enterprises, Inc.*, San Bernardino County
18 Superior Court, Case No. CIV-DS1933035 (September 29, 2020), *Hector Luna v. Triple Canopy,*
19 *Inc.*, Santa Clara County Superior Court, Case No. 19CV345169 (October 22, 2020), *Melbert*
20 *Magpugay v. Harbor Electronics, Inc.*, Santa Clara County Superior Court Case No.
21 19CV352547 (January 27, 2021), *Foster v. Schindler Elevator Corp.*, Alameda County Superior
22 Court Case no. RG19029640 (March 2, 2021), *Martin v. Streetplus Company, LLC, et al*, Los
23 Angeles Superior Court Case No. 19STCV15522 (July 13, 2021), *Morris v. Blue Mountain*
24 *Enterprises, LLC*, Solano County Superior Court, Case No. FCS05.858 (August 4, 2021).

25 13. On June 14, 2019, I argued two related cases in front of the Ninth Circuit Court of
26 Appeals. One of them was *Rodriguez v Nike Retail Service Inc.*, Case No. 17-16866. On June 28,
27 2019, the Ninth Circuit issued a published decision, reversing and remanding in favor of our
28 clients. *Rodriguez v. Nike Retail Servs., Inc.*, 928 F.3d 810 (9th Cir. 2019).

1 14. I have also assisted the firm in numerous wage and hour class action mediations.

2 15. To date, I have incurred approximately 315.8 hours in connection with the
3 litigation of this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of
4 work I have incurred to date on this matter.

5 16. I anticipate the total amount of my fees incurred in this case to be approximately
6 \$221,060.00 based on an hourly rate of \$700.00 per hour (315.8 hours x \$700.00 per hour).

7 17. Since January 2024, I have been approved at the rate of \$650.00 per hour. I was
8 approved at this rate in *Jaramillo v. USS-UPI, LLC*, Contra Costa County Case No. C22-00641
9 (April 24, 2024), *Conner v Red Wing Brands of America, Inc.*, San Mateo County Case No.
10 22CIV03830 (August 12, 2024), and *Buford, et al. v. Estenson Logistics, LLC, et al.*, San Bernardino
11 County Case No. CIVSB2133332 (October 23, 2024). Starting January 2025, I increased my rate to
12 \$700 per hour. Prior to that, I have been approved at \$600.00 per hour in *Weybrew v. BEI*
13 *Construction*, Solano County Superior Court Case No. FCS055658 (January 14, 2022), *In re*
14 *See's Candies Wage and Hour Cases*, Case No. JCCP5004 (March 30, 2022), Los Angeles
15 Superior Court, *Pevey v. Lumber City Corp*, San Bernardino County Superior Court Case No.
16 CIVDS2010240 (May 2, 2022), *Ross v Stater Bros. Markets*, San Bernardino County Superior
17 Court Case No. CIVDS1902518 (September 8, 2022), and *Schneider v. Amazon Retail LLC*, Los
18 Angeles County Superior Court Case No. 21STCV26226 (December 1, 2022). Prior to that
19 throughout 2020 and 2021, I was approved at an hourly rate of at \$550.00 per hour in *James v*
20 *RADC Enterprises, Inc.*, San Bernardino County Superior Court, Case No. CIV-DS1933035
21 (September 29, 2020), *Hector Luna v. Triple Canopy, Inc.*, Santa Clara County Superior Court,
22 Case No. 19CV345169 (October 22, 2020), *Melbert Magpugay v. Harbor Electronics, Inc.*,
23 Santa Clara County Superior Court Case No. 19CV352547 (January 27, 2021), *Foster v.*
24 *Schindler Elevator Corp.*, Alameda County Superior Court Case no. RG19029640 (March 2,
25 2021), *Martin v. Streetplus Company, LLC, et al*, Los Angeles Superior Court Case No.
26 19STCV15522 (July 13, 2021), *Morris v. Blue Mountain Enterprises, LLC*, Solano County
27 Superior Court, Case No. FCS05858 (August 4, 2021).

28 18. Based on the hours and applicable rate, the total lodestar to be expended by Class

1 Counsel through finalizing this settlement will be approximately \$280,550.00, based on 371.9
2 incurred + 10 anticipated total hours, at each attorney's respective billing rates.

3 19. My office has incurred costs in the amount of \$30,820.64. The costs are all
4 litigation related costs, including filing and service fees, postage fees, and costs associated with
5 mediation. Attached hereto as Exhibit B is a true and correct copy of the costs incurred in
6 connection with prosecution of this lawsuit.

7 **NOTICE TO THE LWDA**

8 20. Concurrent with the filing of the Motion for Final Approval of Class Action
9 Settlement, my office uploaded the Motion to the LWDA's website.

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

12 Executed on this 14th day of January 2025, at Los Angeles, California.

13 
14 Max W. Gavron

EXHIBIT A

Abernathy v. Deacon Construction, LLC
Time and Task Chart for Max W. Gavron

Hours	Description of Work
12.5	Factual investigation, interviews with client; draft and revise PAGA letter, further confer with co-counsel and client to prepare for filing of action.
1.2	Analyze and review dockets re potential prior actions filed against Defendant; research and strategize re same.
1.5	Draft complaint; further review and revise complaint
5.9	Meet and confer with opposing counsel for case management conferences, draft, review and revise several joint statements and updated statements in connection therewith
2.5	Draft and revise first set of written discovery; review client documents to prepare same; confer with co-counsel re same.
6.7	Analyze and review Defendant's responses to written discovery; assess items on which to meet and confer; draft and revise meet and confer correspondence and confer with defense counsel re same.
2.6	Analyze, review, and summarize documents produced by Defendant in response to discovery requests; confer with co-counsel re same and address in meet and confer efforts.
2.9	Correspond with and engage third-party administrator to distribute Belaire-West notice; confer with Defendant's counsel re same; confer with defense counsel re communications from company to putative class members regarding Belaire-West notice; conduct legal research re same.
5.8	Meet and confer with opposing counsel regarding first mediation; draft and prepare informal discovery request in connection with mediation; analyze and review Defendant's document production to address same; confer with co-counsel re same.
6.9	Review and analyze production of informal discovery for first mediation, including class payroll data; numerous meet and confer communications with opposing counsel regarding data and documents and regarding liability issues
10.1	Draft and revise mediation brief for first mediation.
7.6	Prepare for and attend mediation; confer with client re same; confer with co-counsel re same.
3.4	Several follow-up conversations with counsel and mediator following failed mediation attempt.
7.0	Prepare plaintiff for deposition; review documents to prepare for same; confer with co-counsel re same.
12.4	Travel to and from and attendance at deposition of plaintiff.
2.1	Confer with plaintiff following deposition; conduct legal research re implications of testimony elicited at deposition; confer with co-counsel re same.

2.8	Analyze and review discovery responses and data produced following failed mediation attempt; strategize re next steps; confer with co-counsel re same.
2.5	Draft and revise notice of deposition for Defendant's Person Most Qualified; meet and confer with Defendant's counsel re same.
9.2	Draft and revise deposition outline for deposition of Defendant's Person Most Qualified; analyze and review documents produced by Defendant to prepare same and compile proposed exhibits; confer with co-counsel re same.
8.5	Prepare for and take deposition of person most qualified.
7.2	Conduct legal research in advance of filing of motion for class certification; analyze and review document production considering same.
38.9	Draft and revise motion for class certification and supporting documents; confer with co-counsel re same; conduct legal research re same.
14.2	Analyze and review Defendant's opposition to Motion for Class Certification; conduct legal research re same; analyze and review declarations submitted in opposition to class certification; strategize re deposition strategy etc.
7.5	Prepare deposition outline for Defendant's declarants who submitted declarations in opposition to motion for class certification; confer with co-counsel re strategy for same and reply in support of motion for class certification.
45.9	Prepare for and/or take depositions of 10 declarants; confer with co-counsel re same re depositions co-counsel took; summarize testimony following same.
7.1	Draft and revise reply in support of motion for class certification and supporting documents; confer with co-counsel re same; conduct legal research re same.
2.5	Prepare for and attend hearing on class certification motion.
4.1	Analyze and review court's order granting class certification; meet and confer with defense counsel re proposed class notice following hearing; confer with client and co-counsel re same.
3.5	Engage class administrator to distribute notice; confer with same and defendant re notice process; field calls from class members following notice process re status of case. etc.
1.5	Confer with defendant re possibility of second mediation; provided updated data request in advance of same.
3.4	Analyze and review data provided in advance of second mediation; confer re damages model.
5.5	Draft and revise second mediation brief; confer with co-counsel re same and conduct legal research re same.
14.9	Travel to and from and participate in second mediation.

3.9	Review and revise MOU; further confer with opposing counsel regarding the terms therein; confer with co-counsel re same
19.1	Draft, review and revise long-form settlement agreement; confer with opposing counsel regarding terms therein; confer with client regarding same.
7.7	Draft motion for preliminary approval of settlement, proposed order, and supporting documents; further revise same
1.9	Review the Court's tentative ruling granting preliminary approval of settlement; further revise class notice pursuant to the Court's instructions; draft and revise supplemental confer with client re same.
2.8	Confer and correspond with settlement administrator regarding administration timeline and dissemination of class notice
1.0	Review reports from settlement administrator re response to class notice
2.2	Field calls from class members following distribution of notice; confer with co-counsel re same.
6.9	Draft motion for final approval of settlement, proposed order, and supporting documents; further revise same.
<u>315.8</u>	<u>TOTAL HOURS</u>

EXHIBIT B

Selection Criteria

Slip Classification Open
Client (hand select) Include: Abernathy Jr., James v. Deacon
Slip.Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
62897 EXP 6/10/2020 WIP LWDA	Olympia Court fees Abernathy Jr., James v. Deac	1	75.00	75.00
62912 EXP 6/17/2020 WIP Odyssey - Complaint	Olympia Court fees Abernathy Jr., James v. Deac	1	1483.77	1483.77
63140 EXP 6/23/2020 WIP Attorney Service - Complaint Service	Olympia Atty Service Abernathy Jr., James v. Deac	1	102.79	102.79
63234 EXP 6/30/2020 WIP Postage	Olympia Postage Abernathy Jr., James v. Deac	1	6.90	6.90
63177 EXP 7/9/2020 WIP Odyssey - POS of Summons	Olympia Court fees Abernathy Jr., James v. Deac	1	5.72	5.72
64442 EXP 10/16/2020 WIP Odyssey - Joint CMS	Olympia Court fees Abernathy Jr., James v. Deac	1	5.72	5.72
64482 EXP 10/21/2020 WIP Courtcalls	Olympia Court fees Abernathy Jr., James v. Deac	1	94.00	94.00
66920 EXP 4/13/2021 WIP Odyssey - Joint CMS	Olympia Court fees Abernathy Jr., James v. Deac	1	5.72	5.72

1/2/2025
12:39 PM

DIVERSITY LAW GROUP
Slip Listing

Page 2

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
67351	EXP	Olympia	1	4950.00	4950.00
5/19/2021		Arbitrators			
WIP		Abernathy Jr., James v. Deac			
JAMS Mediation					
68439	EXP	Erika Mejia	1	5.72	5.72
8/13/2021		Court fees			
WIP		Abernathy Jr., James v. Deac			
Odyssey - Joint CMS					
68540	EXP	Max Gavron	1	94.00	94.00
8/18/2021		Court fees			
WIP		Abernathy Jr., James v. Deac			
Courtcall					
69857	EXP	Christine S. Lee	1	5.72	5.72
12/3/2021		Court fees			
WIP		Abernathy Jr., James v. Deac			
Odyssey - Joint CMS					
69918	EXP	Max Gavron	1	94.00	94.00
12/8/2021		Court fees			
WIP		Abernathy Jr., James v. Deac			
Courtcall					
70121	EXP	Olympia	1	5.72	5.72
12/16/2021		Court fees			
WIP		Abernathy Jr., James v. Deac			
Odyssey - IDC Statement					
70139	EXP	Max Gavron	1	94.00	94.00
12/20/2021		Court fees			
WIP		Abernathy Jr., James v. Deac			
Courtcall					
70271	EXP	Christine S. Lee	1	26.32	26.32
1/7/2022		Court fees			
WIP		Abernathy Jr., James v. Deac			
Odyssey - Joint Stip re IDC					
71333	EXP	Erika Mejia	1	5.72	5.72
4/8/2022		Court fees			
WIP		Abernathy Jr., James v. Deac			
Odyssey - Joint CMS					
71414	EXP	Max Gavron	1	94.00	94.00
4/13/2022		Court fees			
WIP		Abernathy Jr., James v. Deac			
Courtcall					

1/2/2025
12:39 PM

DIVERSITY LAW GROUP
Slip Listing

Page 3

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
71598	EXP	Olympia	1	1331.40	1331.40
4/28/2022		Transcript/DEP			
WIP		Abernathy Jr., James v. Deac			
Steno - Deposition Transcript of Victoria Wade					
72453	EXP	Erika Mejia	1	5.72	5.72
7/14/2022		Court fees			
WIP		Abernathy Jr., James v. Deac			
Odyssey - Objection to Notice of Depo					
72950	EXP	Max Gavron	1	581.97	581.97
8/10/2022		Other travel			
WIP		Abernathy Jr., James v. Deac			
Southwest					
72948	EXP	Max Gavron	1	10.99	10.99
8/13/2022		Other travel			
WIP		Abernathy Jr., James v. Deac			
Southwest					
72947	EXP	Max Gavron	1	5.00	5.00
8/15/2022		Other travel			
WIP		Abernathy Jr., James v. Deac			
Uber					
72949	EXP	Max Gavron	1	71.97	71.97
8/15/2022		Other travel			
WIP		Abernathy Jr., James v. Deac			
Uber					
73389	EXP	Max Gavron	1	3.45	3.45
8/15/2022		Meals			
WIP		Abernathy Jr., James v. Deac			
Meal					
73390	EXP	Max Gavron	1	54.00	54.00
8/15/2022		Other travel			
WIP		Abernathy Jr., James v. Deac			
Parking					
73391	EXP	Max Gavron	1	26.13	26.13
8/15/2022		Meals			
WIP		Abernathy Jr., James v. Deac			
Meal					
73388	EXP	Max Gavron	1	271.58	271.58
8/16/2022		Other travel			
WIP		Abernathy Jr., James v. Deac			
Hotel					

1/2/2025
12:39 PM

DIVERSITY LAW GROUP
Slip Listing

Page 4

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
73392	EXP	Max Gavron	1	48.93	48.93
8/16/2022		Outside print			
WIP		Abernathy Jr., James v. Deac			
Uber					
72893	EXP	Erika Mejia	1	26.32	26.32
9/6/2022		Court fees			
WIP		Abernathy Jr., James v. Deac			
Odyssey - Stip to Cont					
73037	EXP	Olympia	1	1576.80	1576.80
9/21/2022		Transcript/DEP			
WIP		Abernathy Jr., James v. Deac			
US Legal Support - Deposition Transcript of James Abernathy					
73104	EXP	Erika Mejia	1	67.52	67.52
9/23/2022		Court fees			
WIP		Abernathy Jr., James v. Deac			
Odyssey - Motion for Class Certification					
73328	EXP	Olympia	1	0.57	0.57
9/30/2022		Postage			
WIP		Abernathy Jr., James v. Deac			
Postage					
73810	EXP	Linda Lee	1	102.55	102.55
11/4/2022		Atty Service			
WIP		Abernathy Jr., James v. Deac			
Attorney Service - Amended Notice of Depo					
73588	EXP	Olympia	1	778.60	778.60
11/16/2022		Transcript/DEP			
WIP		Abernathy Jr., James v. Deac			
Steno - Deposition Transcript of Robert Dacy					
73589	EXP	Olympia	1	612.70	612.70
11/16/2022		Transcript/DEP			
WIP		Abernathy Jr., James v. Deac			
Steno - Deposition Transcript of Brandon Nelson					
73587	EXP	Olympia	1	1018.70	1018.70
11/16/2022		Transcript/DEP			
WIP		Abernathy Jr., James v. Deac			
Steno - Deposition Transcript of Edgar Gonzalez					

1/2/2025
12:39 PM

DIVERSITY LAW GROUP
Slip Listing

Page 5

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
73590	EXP	Olympia	1	629.25	629.25
11/16/2022		Transcript/DEP			
WIP		Abernathy Jr., James v. Deac			
Steno - Deposition Transcript of Henry Moore					
73581	EXP	Olympia	1	762.12	762.12
11/16/2022		Transcript/DEP			
WIP		Abernathy Jr., James v. Deac			
Steno - Deposition Transcript of Kathleen Johnson					
73586	EXP	Olympia	1	598.25	598.25
11/16/2022		Transcript/DEP			
WIP		Abernathy Jr., James v. Deac			
Steno - Deposition Transcript of Stephanie Beck					
73585	EXP	Olympia	1	639.81	639.81
11/16/2022		Transcript/DEP			
WIP		Abernathy Jr., James v. Deac			
Steno - Deposition Transcript of Arlene Lopez					
73584	EXP	Olympia	1	641.61	641.61
11/16/2022		Transcript/DEP			
WIP		Abernathy Jr., James v. Deac			
Steno - Deposition Transcript of Brittinee Garo					
73583	EXP	Olympia	1	785.25	785.25
11/16/2022		Transcript/DEP			
WIP		Abernathy Jr., James v. Deac			
Steno - Deposition Transcript of Brett Mykrantz					
73582	EXP	Olympia	1	591.89	591.89
11/16/2022		Transcript/DEP			
WIP		Abernathy Jr., James v. Deac			
Steno - Deposition Transcript of Robert McCrickard					
73603	EXP	Erika Mejia	1	5.72	5.72
11/18/2022		Court fees			
WIP		Abernathy Jr., James v. Deac			
Odyssey - Reply iso Motion for Class Cert					

1/2/2025
12:39 PM

DIVERSITY LAW GROUP
Slip Listing

Page 6

Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
73851 EXP 12/9/2022 WIP Odyssey - Joint CMS	Erika Mejia Court fees Abernathy Jr., James v. Deac	1	5.72	5.72
74033 EXP 12/12/2022 WIP Odyssey - Surreply	Erika Mejia Court fees Abernathy Jr., James v. Deac	1	5.72	5.72
74249 EXP 1/23/2023 WIP Odyssey - 170.6	Olympia Court fees Abernathy Jr., James v. Deac	1	5.72	5.72
74520 EXP 3/1/2023 WIP Odyssey - IDC Statement	Erika Mejia Court fees Abernathy Jr., James v. Deac	1	5.72	5.72
75316 EXP 5/30/2023 WIP Odyssey - Stip re Class Notice	Erika Mejia Court fees Abernathy Jr., James v. Deac	1	26.32	26.32
75335 EXP 6/1/2023 WIP Odyssey - NOE	Erika Mejia Court fees Abernathy Jr., James v. Deac	1	5.72	5.72
75984 EXP 8/21/2023 WIP Odyssey - Joint CMS	Erika Mejia Class Notice Abernathy Jr., James v. Deac	1	5.72	5.72
76937 EXP 11/30/2023 WIP Postage	Olympia Postage Abernathy Jr., James v. Deac	1	0.63	0.63
76903 EXP 12/5/2023 WIP JAMS Mediation	Olympia Arbitrators Abernathy Jr., James v. Deac	1	10500.00	10500.00
79862 EXP 12/13/2023 WIP Flight	Max Gavron Other travel Abernathy Jr., James v. Deac	1	836.69	836.69

1/2/2025
12:39 PM

DIVERSITY LAW GROUP
Slip Listing

Page 7

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
79863	EXP	Max Gavron	1	30.00	30.00
12/18/2023		Other travel			
WIP		Abernathy Jr., James v. Deac			
Airport					
79864	EXP	Max Gavron	1	18.20	18.20
12/18/2023		Meals			
WIP		Abernathy Jr., James v. Deac			
Meal					
79865	EXP	Max Gavron	1	34.59	34.59
12/18/2023		Other travel			
WIP		Abernathy Jr., James v. Deac			
Hotel					
79867	EXP	Max Gavron	1	36.20	36.20
12/18/2023		Meals			
WIP		Abernathy Jr., James v. Deac			
Meal					
79868	EXP	Max Gavron	1	4.38	4.38
12/18/2023		Meals			
WIP		Abernathy Jr., James v. Deac			
Meal					
79869	EXP	Max Gavron	1	25.43	25.43
12/18/2023		Other travel			
WIP		Abernathy Jr., James v. Deac			
Uber					
79870	EXP	Max Gavron	1	24.92	24.92
12/19/2023		Other travel			
WIP		Abernathy Jr., James v. Deac			
Uber					
77033	EXP	Max Gavron	1	16.38	16.38
12/20/2023		Other travel			
WIP		Abernathy Jr., James v. Deac			
Mileage (25 miles x \$0.655)					
77238	EXP	Olympia	1	500.00	500.00
1/17/2024		Arbitrators			
WIP		Abernathy Jr., James v. Deac			
JAMS Mediation					
78673	EXP	Olympia	1	67.52	67.52
7/2/2024		Court fees			
WIP		Abernathy Jr., James v. Deac			
Odyssey - MPA					

1/2/2025
12:39 PM

DIVERSITY LAW GROUP
Slip Listing

Page 8

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
78815	EXP	Erika Mejia	1	5.72	5.72
7/16/2024		Court fees			
WIP		Abernathy Jr., James v. Deac			
Odyssey - Joint CMS					
78871	EXP	Erika Mejia	1	5.72	5.72
7/25/2024		Court fees			
WIP		Abernathy Jr., James v. Deac			
Odyssey - Supp MG Decl iso MPA					
80104	EXP	Max Gavron	1	250.00	250.00
1/2/2025		Court fees			
WIP		Abernathy Jr., James v. Deac			
MFA Filing					
Grand Total					
			Billable	0.00	30820.64
			Unbillable	0.00	0.00
			Total	0.00	30820.64