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Attorneys for Plaintiff Eric Garcia, individually and  
on behalf of all others similarly situated

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

ERIC GARCIA, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

LIGHTNING SOURCE LLC; INGRAM  
DISTRIBUTION MANAGEMENT INC.;  
INGRAM CONTENT GROUP LLC; and  
DOES 1 through 25, inclusive

Defendants.

Case No. 20CECG01641

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Jeffrey Hamilton

Department 503

**CLASS AND PAGA ACTION**

**DECLARATION OF JONATHAN M. LEBE**

**IN SUPPORT OF MOTION FOR ORDER**

**GRANTING FINAL APPROVAL OF**

**CLASS ACTION SETTLEMENT AND**

**ENTERING JUDGMENT**

Date: June 15, 2023

Time: 3:30 p.m.

Dept: 503

Judge: Hon. Jeffrey Hamilton

Filed: June 10, 2020

Trial date: Not set

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1 responsible for the day-to-day management of numerous wage and hour class actions at a  
2 given time.

3 7. I started my own law firm in early 2016. In 2018, 2019, 2020, 2021 and 2022,  
4 I was selected as a Super Lawyer Rising Star based on nominations from my peers, a  
5 distinction only received by 2.5% of attorneys. The vast majority of my practice consists of  
6 litigating wage and hour class actions filed in California. Some of our firm's representative  
7 matters include:

8 a. *Midwest Motor Supply Co. v. Superior Court* (2020) 56 Cal.App.5th 702: In its  
9 published opinion, the Court of Appeal affirmed the trial court's denial  
10 of Defendants' motion to dismiss or stay action for forum non conveniens because  
11 Defendants' purported forum selection clause was unenforceable under Labor Code  
12 section 925.

13 b. *Zakaryan v. The Men's Wearhouse, Inc.* (2019) 33 Cal.App.5th 659: In its  
14 published opinion, Court of Appeal affirmed a trial court's denial of Defendants'  
15 motion to compel arbitration (disapproved on another ground in *ZB, N.A. v.*  
16 *Superior Court* (2019) 8 Cal.5th 175).

17 c. *Ortega v. Carson Wild Wings, LLC* (Los Angeles Superior Court, Case No.  
18 BC677388): In this matter, our firm obtained a unanimous jury verdict holding our  
19 client's former employer responsible for wrongful termination and retaliation. In  
20 its verdict, the jury awarded our client \$300,000 in lost earnings, emotional distress  
21 damages, punitive damages and penalties. The Court also awarded \$291,948 in  
22 attorneys' fees. This matter is currently on appeal.

23 8. I have been appointed certified Class Counsel in the following proceedings in  
24 connection with approvals of wage and hour class action and Private Attorney General Act  
25 settlements: *Amie Pfiefer v. Zesty Inc.*, San Francisco Superior Court, CGC-19-574570;  
26 *Anthony Dirico, et al. v. Seek Capital, LLC*, Los Angeles Superior Court Case No. BC698076;  
27 *Brandon Centino v. Arrowhead Products, Orange County Superior Court*, Case No. 30-2018-  
28 00988493; *Donna Burris v. Resort Vacations, Inc.*, Orange County Superior Court, Case No.

1 2018-00997260; *Elizabeth Merritt v. Houzz Inc.*, Santa Clara Superior Court, Case No.  
2 19CV341181; *Janet Manteon v. M.A.C. Cosmetics, Inc.*, Los Angeles County Superior Court,  
3 Case No. BC702940; *Jamal Holcomb v. Weiser Security Services, Inc.*, Los Angeles Superior  
4 Court, Case No. 19STCV03843; *Jerome Hughes, et al. v. Surveillance Security, Inc.*, Judicial  
5 Coordination Proceeding Case No. 4969; *Jihwan Kim v. Demandforce, Inc.*, San Francisco  
6 Superior Court, Case No. CGC-18-570997; *Jordan Olson v. Medtronic, Inc., et al.*, San  
7 Francisco Superior Court, Case No. CGC-19-576875; *Joseph Jun Caballero v. MLTD, Inc.*,  
8 Los Angeles Superior Court Case No. BC659936; *Kendall Klette v. Balboa Capital*  
9 *Corporation*, Orange County Superior Court, Case No. 30-2018-00970552; *Kevin Klein v.*  
10 *Loomis Armored, US LLC*, San Bernardino Superior Court Case No. CIVDS1704547; *Leslie*  
11 *Walling v. National Funding Inc.*, San Diego Superior Court, Case No. 201800061889; *Lorena*  
12 *Sanchez v. Valley Presbyterian Hospital*, Los Angeles Superior Court Case No. BC678638;  
13 *Lucas Cardena v. Strata Capital Corporation*, Orange County Superior Court, Case No. 30-  
14 2018-01041233-CU-OE-CXC; *Michael Schmitz, et al. v. HealthIQ Re Inc.*, Santa Clara  
15 Superior Court, Case No. 18CV337951; *Patricia Martinez v. Whaler LLC*, Los Angeles  
16 Superior Court Case No. BC621047; *Rhett Hubbard v. Caliber Home Loans, Inc.*, Orange  
17 County Superior Court, 30-2018-01017838; *Shameka Watson v. Aegis Security &*  
18 *Investigations Inc.*, Los Angeles Superior Court Case No. BC695411; *Shayna Amster v.*  
19 *Starbucks Corporation*, San Bernardino Superior Court, Case No. CIVDS1922016; *Suzana*  
20 *Mederos v. Consolidated Disposal Service, L.L.C.*, Los Angeles Superior Court, Case No.  
21 BC677379; *Tyler Jones, et al. v. Citiguard, Inc.*, Los Angeles County Superior Court Case  
22 Number BC664890; *Don Vasquez v. Milk Specialties Company*, Tulare County Superior Court  
23 Case Number VCU282778; *Tanya Savidis v. Lumber Liquidators, Inc.*, Case No.  
24 RG20057480, Alameda County Superior Court; *Beniyam Kebede v. Wrike, Inc.*, Case No.  
25 20CV366599, Santa Clara Superior Court; *Jason Mitchiner v. Move Sales, Inc.*, Case No.  
26 20STCV23141, Los Angeles Superior Court; *Daisy Page v. Insource Performance Solutions*  
27 *et al.*, Case No. RG21096367, Alameda Superior Court.

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9. I consider myself experienced and qualified to evaluate the class claims and viability of the defenses. Based on the history of the above-captioned case, and given my experience and analysis, it is my view that the settlement is fair, reasonable, and adequate, and in the best interest of the class members. Had the litigation not reached the proposed settlement set forth in the Settlement Agreement, I would have continued to prosecute the class claims through certification, trial and beyond.

10. Zachary Gershman is an associate attorney of Lebe Law, APLC in good standing of the State Bar of California and admitted to practice in all state courts in California, and in the Central, Eastern, and Northern United States District Courts in California.

11. Mr. Gershman began working for Lebe Law, APLC in August of 2019 as a law clerk after graduating from the USC Gould School of Law in May of 2019, where he was an Executive Senior Editor of the Southern California Law Review. He received his Bachelor of Arts degree in Political Science from the University of Connecticut in 2015. He was admitted to the California State Bar on December 2, 2019.

### Attorneys' Fees

12. As shown in my concurrently filed detailed billing records, attached hereto as “**Exhibit A**”, I have worked approximately 83.6 hours on this case. This number is inclusive of the one hour I expect to spend attending the final approval hearing in this matter. At my billable rate of \$800 per hour my lodestar attorney’s fees, before any multiplier, amount to \$66,880. Moreover, my firm has incurred \$68.68 in costs in this matter. My rate with annual increases has been approved by other California courts, including those listed in paragraph 8. Attached as “**Exhibit B**” is a breakdown of my firm’s current costs in this matter.

13. As shown in Mr. Gershman's concurrently attached detailed billing records, attached hereto as **"Exhibit C"**, Mr. Gershman has expended a total of 65.8 hours in the prosecution of this matter. None of his time duplicated the time expended by others. Mr. Gershman's rate with annual increases has also been approved by other California courts, including those listed in paragraph 8. At his requested rate of \$475, his fees calculate out to \$31,255.00.

14. My firm's total lodestar in this case is \$98,135.

I declare under the penalty of perjury under the laws of the State of California the foregoing is true and correct and this declaration is executed May 23, 2023, in Los Angeles, California.



Jonathan M. Lebe

# EXHIBIT A

| Date     | Hours | Description                                                                                                                                         | Rate (\$) | User          |
|----------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------|
| 4/28/20  | 2.8   | Intake with client; discuss and send engagement letter                                                                                              | 800       | Jonathan Lebe |
| 5/19/20  | 3.1   | Review Personnel file; analyze for potential claims                                                                                                 | 800       | Jonathan Lebe |
| 5/19/20  | 0.8   | Correspondence to potential co-counsel re potential case                                                                                            | 800       | Jonathan Lebe |
| 5/21/20  | 4.2   | Review and analyze previous class action and litigation in which Ingram was a defendant                                                             | 800       | Jonathan Lebe |
| 5/25/20  | 0.2   | Telephonic conference with client regarding his time working with Ingram and additional questions regarding his representation                      | 800       | Jonathan Lebe |
| 5/25/20  | 0.2   | Review/edit catalyst and record retention letters                                                                                                   | 800       | Jonathan Lebe |
| 5/26/20  | 2.5   | Review and edit complaint                                                                                                                           | 800       | Jonathan Lebe |
| 5/26/20  | 1.8   | Review and edit PAGA notice                                                                                                                         | 800       | Jonathan Lebe |
| 5/29/20  | 0.2   | Call with client to discuss this matter and additional factual issues with his case                                                                 | 800       | Jonathan Lebe |
| 6/8/20   | 0.5   | Further review and finalize Complaint and PAGA letter for this matter                                                                               | 800       | Jonathan Lebe |
| 6/11/20  | 1.2   | Review Notice of Assignment and research related thereto                                                                                            | 800       | Jonathan Lebe |
| 6/17/20  | 0.6   | Review and revise Amended PAGA Notice with wage statement claim                                                                                     | 800       | Jonathan Lebe |
| 8/11/20  | 2.3   | Review and edit first set of written discovery                                                                                                      | 800       | Jonathan Lebe |
| 8/12/20  | 0.3   | Review/edit email for co-counsel regarding Ingram content group discovery                                                                           | 800       | Jonathan Lebe |
| 8/12/20  | 0.5   | Review and discuss research Re: Ingram Content Group cases and joint employment for this matter                                                     | 800       | Jonathan Lebe |
| 8/13/20  | 0.2   | Review and edit email to co-counsel regarding the filing of an FAC in this matter                                                                   | 800       | Jonathan Lebe |
| 8/26/20  | 0.5   | Review discovery propounded on Plaintiff by Defendant                                                                                               | 800       | Jonathan Lebe |
| 8/26/20  | 0.1   | Review correspondence re joint employment discovery                                                                                                 | 800       | Jonathan Lebe |
| 8/26/20  | 0.2   | Review correspondence re joint employment discovery                                                                                                 | 800       | Jonathan Lebe |
| 8/31/20  | 1.9   | Review discovery responses                                                                                                                          | 800       | Jonathan Lebe |
| 9/2/20   | 0.3   | Review and provide edits to the FAC                                                                                                                 | 800       | Jonathan Lebe |
| 9/10/20  | 0.7   | Review finalized discovery for this matter, approve, and send to co-counsel for finalization and service                                            | 800       | Jonathan Lebe |
| 9/10/20  | 0.1   | Send revised FAC to co-counsel for further edits and reviews.                                                                                       | 800       | Jonathan Lebe |
| 9/10/20  | 0.5   | Finalize FAC with exhibits for this matter                                                                                                          | 800       | Jonathan Lebe |
| 9/10/20  | 0.5   | Read research re local rules of Fresno court for local rules re: status conferences for complex cases to determine topics necessary in joint report | 800       | Jonathan Lebe |
| 9/10/20  | 1.3   | Review research re: amending PAGA; discuss internally                                                                                               | 800       | Jonathan Lebe |
| 9/11/20  | 0.6   | Telephonic Conference with client regarding discovery responses                                                                                     | 800       | Jonathan Lebe |
| 9/11/20  | 0.3   | Review email to the client regarding discovery                                                                                                      | 800       | Jonathan Lebe |
| 9/21/20  | 0.3   | Review email to the client regarding discovery                                                                                                      | 800       | Jonathan Lebe |
| 9/23/20  | 0.1   | Call with opposing counsel re: meet and confer for joint cmc statement                                                                              | 800       | Jonathan Lebe |
| 9/24/20  | 1.3   | Review/Revise Joint Statement for the ISC for this matter                                                                                           | 800       | Jonathan Lebe |
| 9/24/20  | 0.3   | Review Stipulation Re: ADR for this matter                                                                                                          | 800       | Jonathan Lebe |
| 9/28/20  | 0.1   | Review Defendant's Case Management Statement                                                                                                        | 800       | Jonathan Lebe |
| 10/6/20  | 1.1   | Review and edit ISC statement                                                                                                                       | 800       | Jonathan Lebe |
| 10/15/20 | 0.1   | Telephonic Conference with the clerk re: case management conference.                                                                                | 800       | Jonathan Lebe |
| 10/15/20 | 3.3   | Review/Revise draft discovery responses                                                                                                             | 800       | Jonathan Lebe |
| 10/16/20 | 0.2   | Call with Eric re: additional documents to produce                                                                                                  | 800       | Jonathan Lebe |
| 10/17/20 | 1.7   | Review document production                                                                                                                          | 800       | Jonathan Lebe |
| 10/19/20 | 0.1   | Review email correspondence to opposing counsel re: Discovery responses                                                                             | 800       | Jonathan Lebe |
| 10/25/20 | 0.1   | Discussion with client re: producing documents                                                                                                      | 800       | Jonathan Lebe |
| 10/27/20 | 0.2   | Discussion re: Ingram with co-counsel about status                                                                                                  | 800       | Jonathan Lebe |
| 10/29/20 | 2.4   | Review/Revise Plaintiff's discovery                                                                                                                 | 800       | Jonathan Lebe |
| 10/29/20 | 1.6   | Review/Analyze doc production and redaction                                                                                                         | 800       | Jonathan Lebe |
| 11/4/20  | 1.8   | Review/Revise discovery responses                                                                                                                   | 800       | Jonathan Lebe |
| 11/5/20  | 0.3   | Review verifications and discovery                                                                                                                  | 800       | Jonathan Lebe |
| 11/12/20 | 0.2   | Provide status update to the client re: mediation                                                                                                   | 800       | Jonathan Lebe |
| 11/16/20 | 0.2   | Review informal document production requests sent from Co-Counsel and draft e-mail response                                                         | 800       | Jonathan Lebe |
| 11/16/20 | 0.2   | Review informal document production request drafted by Co-Counsel and provide feedback                                                              | 800       | Jonathan Lebe |
| 2/22/21  | 0.1   | Reach out to client re: status of mediation                                                                                                         | 800       | Jonathan Lebe |
| 2/25/21  | 0.1   | Call with co-counsel to discuss informal discovery                                                                                                  | 800       | Jonathan Lebe |
| 2/25/21  | 0.1   | Review email to co-counsel re: business expenses claim for mediation                                                                                | 800       | Jonathan Lebe |
| 3/21/21  | 2.8   | Review informal discovery production in advance of mediation                                                                                        | 800       | Jonathan Lebe |
| 4/21/21  | 1.2   | Review of wage statements and shift differential analysis                                                                                           | 800       | Jonathan Lebe |
| 4/22/21  | 0.2   | Review of research re: Ingram Content Group LLC Entity                                                                                              | 800       | Jonathan Lebe |
| 4/28/21  | 0.3   | Review Defendant's CMC statement and draft email re: Plaintiff's CMC statement                                                                      | 800       | Jonathan Lebe |
| 4/28/21  | 6.2   | Prepare for mediation                                                                                                                               | 800       | Jonathan Lebe |
| 4/29/21  | 6.9   | Attend mediation for this matter                                                                                                                    | 800       | Jonathan Lebe |
| 5/24/21  | 0.2   | Review expenses for this matter and communicate with co-counsel                                                                                     | 800       | Jonathan Lebe |
| 6/16/21  | 0.8   | Review Ingram MDU                                                                                                                                   | 800       | Jonathan Lebe |
| 7/12/21  | 0.3   | Communicate with Co-Counsel re: Second Amended Complaint                                                                                            | 800       | Jonathan Lebe |
| 7/12/21  | 0.1   | Email co-counsel re: SAC                                                                                                                            | 800       | Jonathan Lebe |
| 7/12/21  | 1.8   | Review/Revise Second Amended Complaint                                                                                                              | 800       | Jonathan Lebe |
| 7/12/21  | 0.2   | Meeting with ZG Re: Second Amended Complaint                                                                                                        | 800       | Jonathan Lebe |
| 7/15/21  | 0.2   | Review order continuing CMC date and calendar new deadlines for CMC and case management conference statement                                        | 800       | Jonathan Lebe |
| 7/19/21  | 0.1   | Meeting with ZG re: Second Amended Complaint in this matter.                                                                                        | 800       | Jonathan Lebe |
| 7/19/21  | 0.1   | Email co-counsel re: status of Second Amended Complaint                                                                                             | 800       | Jonathan Lebe |
| 7/19/21  | 0.1   | Email co-counsel re: SAC                                                                                                                            | 800       | Jonathan Lebe |
| 11/1/21  | 0.9   | Review/Revise declaration iso preliminary approval                                                                                                  | 800       | Jonathan Lebe |
| 11/1/21  | 0.1   | Communicate with ZG re declaration iso preliminary approval in this action                                                                          | 800       | Jonathan Lebe |
| 11/17/21 | 0.1   | Communicate with JML re preliminary approval motion for this matter and contact with class members                                                  | 800       | Jonathan Lebe |
| 11/29/21 | 0.1   | Email co-counsel re: preliminary approval motion                                                                                                    | 800       | Jonathan Lebe |
| 11/29/21 | 0.6   | Review declaration iso preliminary approval                                                                                                         | 800       | Jonathan Lebe |
| 12/15/21 | 0.2   | Review order re: continuance of CMC and calendar new date                                                                                           | 800       | Jonathan Lebe |
| 5/2/22   | 0.2   | Review tentative ruling re hearing on preliminary motion for approval                                                                               | 800       | Jonathan Lebe |
| 5/2/22   | 0.1   | Review correspondence from co-counsel regarding tentative ruling on MPA                                                                             | 800       | Jonathan Lebe |
| 5/10/22  | 0.2   | Communicate with ZG regarding MPA and next steps                                                                                                    | 800       | Jonathan Lebe |
| 5/22/22  | 0.2   | Check status of case and calendar CMC                                                                                                               | 800       | Jonathan Lebe |
| 5/24/22  | 0.2   | Calendar new preliminary approval motion date                                                                                                       | 800       | Jonathan Lebe |
| 6/5/22   | 0.1   | Request status of mpa                                                                                                                               | 800       | Jonathan Lebe |
| 6/9/22   | 0.5   | Review tentative decision re preliminary approval                                                                                                   | 800       | Jonathan Lebe |
| 6/16/22  | 0.2   | Review email with co-counsel re: preliminary approval changes                                                                                       | 800       | Jonathan Lebe |
| 6/20/22  | 0.2   | Meeting with ZG regarding status of MPA in this matter                                                                                              | 800       | Jonathan Lebe |
| 7/7/22   | 0.1   | Review status of MPA                                                                                                                                | 800       | Jonathan Lebe |
| 7/14/22  | 0.2   | Email co-counsel re declaration from Defendant and CMC                                                                                              | 800       | Jonathan Lebe |
| 7/25/22  | 0.1   | Review email re: preliminary approval                                                                                                               | 800       | Jonathan Lebe |
| 8/4/22   | 0.1   | Review signed declaration from co-counsel re mpa                                                                                                    | 800       | Jonathan Lebe |
| 8/17/22  | 0.1   | Communicate in firm re calendared dates for MPA                                                                                                     | 800       | Jonathan Lebe |
| 10/12/22 | 0.1   | Communicate in firm re status of appearances at preliminary approval hearing                                                                        | 800       | Jonathan Lebe |
| 11/16/22 | 0.5   | Review tentative in this matter regarding preliminary approval                                                                                      | 800       | Jonathan Lebe |
| 11/28/22 | 0.1   | Review email from settlement administrator                                                                                                          | 800       | Jonathan Lebe |
| 12/5/22  | 0.1   | Communicate with ZG regarding final approval hearing                                                                                                | 800       | Jonathan Lebe |
| 12/8/22  | 0.1   | Review email from settlement administrator regarding status                                                                                         | 800       | Jonathan Lebe |
| 1/22/23  | 0.5   | Check status of case and final approval motion                                                                                                      | 800       | Jonathan Lebe |
| 1/24/23  | 0.2   | Review notice of reassignment and transmit internally                                                                                               | 800       | Jonathan Lebe |
| 1/26/23  | 0.5   | Research re newly assigned judge                                                                                                                    | 800       | Jonathan Lebe |
| 2/9/23   | 0.4   | Review settlement administrator email and proposed notice                                                                                           | 800       | Jonathan Lebe |
| 2/10/23  | 0.2   | Further review mailing docs and communicate with co counsel regarding the same                                                                      | 800       | Jonathan Lebe |
| 2/16/23  | 0.2   | Email co-counsel re mailing documents                                                                                                               | 800       | Jonathan Lebe |
| 2/16/23  | 0.3   | Email defense counsel regarding mailing documents                                                                                                   | 800       | Jonathan Lebe |
| 2/16/23  | 0.1   | Review email from co-counsel re mailing documents                                                                                                   | 800       | Jonathan Lebe |
| 2/17/23  | 0.2   | Review email re new response deadline                                                                                                               | 800       | Jonathan Lebe |
| 3/7/23   | 0.2   | Communicate with co-counsel regarding final approval hearing                                                                                        | 800       | Jonathan Lebe |
| 3/7/23   | 0.2   | Follow up email with co-counsel re new final approval deadline and date                                                                             | 800       | Jonathan Lebe |
| 3/7/23   | 0.4   | Revise stip and send back to co-counsel re final approval                                                                                           | 800       | Jonathan Lebe |
| 3/15/23  | 0.1   | Review email correspondence regarding additional mailing documents                                                                                  | 800       | Jonathan Lebe |
| 3/16/23  | 0.1   | Communicate with paralegal re new deadlines for final approval of settlement                                                                        | 800       | Jonathan Lebe |
| 4/6/23   | 0.2   | Review weekly report                                                                                                                                | 800       | Jonathan Lebe |
| 4/18/23  | 0.3   | Review stip re final approval motion                                                                                                                | 800       | Jonathan Lebe |
| 4/21/23  | 0.1   | Review weekly report                                                                                                                                | 800       | Jonathan Lebe |
| 4/28/23  | 0.1   | Review weekly report                                                                                                                                | 800       | Jonathan Lebe |
| 5/9/23   | 0.2   | Review email co-counsel re final approval                                                                                                           | 800       | Jonathan Lebe |
| 5/9/23   | 0.1   | Review weekly report                                                                                                                                | 800       | Jonathan Lebe |
| 5/10/23  | 0.1   | Review email co-counsel re motion for final approval                                                                                                | 800       | Jonathan Lebe |
| 5/10/23  | 0.1   | Review weekly report re final approval                                                                                                              | 800       | Jonathan Lebe |
| 5/11/23  | 0.1   | Communicate internally re costs                                                                                                                     | 800       | Jonathan Lebe |
| 5/11/23  | 0.8   | Review costs in this matter, verify, and communicate with co-counsel regarding same                                                                 | 800       | Jonathan Lebe |
| 5/11/23  | 0.1   | Review email regarding settlement                                                                                                                   | 800       | Jonathan Lebe |
| 5/15/23  | 2.7   | Review/Revise MFA                                                                                                                                   | 800       | Jonathan Lebe |
| 5/16/23  | 1.8   | Review and revise MFA docs                                                                                                                          | 800       | Jonathan Lebe |
| 5/18/23  | 2.2   | Review MFA and supporting documents                                                                                                                 | 800       | Jonathan Lebe |

# EXHIBIT B

# Litigation Costs - Ingram

05/23/2023  
10:40 AM

| Date       | Type | Description                                                                     | Matter                                      | User        | Qty  | Rate (\$) | Non-billable (\$) | Billable (\$)    |
|------------|------|---------------------------------------------------------------------------------|---------------------------------------------|-------------|------|-----------|-------------------|------------------|
| 04/28/2020 | \$   | Certified Letter for Records Request and Notice of Representation<br>● Unbilled | 00209-Garcia Garcia v. Ingram Content Group | Diana Lopez | 1.00 | \$13.90   | -                 | \$13.90          |
| 06/08/2020 | \$   | Certified Mailing of PAGA Letter<br>● Unbilled                                  | 00209-Garcia Garcia v. Ingram Content Group | Diana Lopez | 1.00 | \$27.39   | -                 | \$27.39          |
| 06/24/2020 | \$   | Certified Mail of Amended PAGA Notice<br>● Unbilled                             | 00209-Garcia Garcia v. Ingram Content Group | Diana Lopez | 1.00 | \$27.39   | -                 | \$27.39          |
|            |      |                                                                                 |                                             |             |      |           | \$0.00<br>0.00h   | \$68.68<br>0.00h |

# EXHIBIT C

| Date     | Hours | Description                                                                                                                                                                            | Rate (\$) | User             |
|----------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|------------------|
| 5/25/20  | 0.2   | Telephonic conference with Eric regarding his time working with Ingram and additional questions regarding his representation.                                                          | 475       | Zachary Gershman |
| 5/25/20  | 1.2   | 1.2 Draft the PAGA letter for this action.                                                                                                                                             | 475       | Zachary Gershman |
| 5/25/20  | 0.2   | 0.2 Draft catalyst and record retention letters for this case.                                                                                                                         | 475       | Zachary Gershman |
| 5/25/20  | 1.2   | 1.2 Draft a class action complaint for this case.                                                                                                                                      | 475       | Zachary Gershman |
| 5/29/20  | 0.2   | 0.2 Call with client Eric Garcia to discuss this matter and additional factual issues with his case.                                                                                   | 475       | Zachary Gershman |
| 6/3/20   | 0.3   | 0.3 Review PAGA Letter and review PAGA letter and Complaint and send to Michael Singer for his review.                                                                                 | 475       | Zachary Gershman |
| 6/8/20   | 0.3   | 0.3 Review and finalize Complaint and PAGA letter for this matter for Jon's signature.                                                                                                 | 475       | Zachary Gershman |
| 6/11/20  | 0.4   | 0.4 Review and calendar case management conference order and research the judge assigned to this case, Judge Kimberly Gaab.                                                            | 475       | Zachary Gershman |
| 6/17/20  | 0.2   | 0.2 Draft Amended PAGA Notice with wage statement claim.                                                                                                                               | 475       | Zachary Gershman |
| 8/1/20   | 0.9   | 0.9 Review special interrogatories to be served on Defendants.                                                                                                                         | 475       | Zachary Gershman |
| 8/11/20  | 0.9   | 0.9 Review RFA's to be served on Defendants.                                                                                                                                           | 475       | Zachary Gershman |
| 8/12/20  | 1.2   | 1.2 Review Ingram Content Group Discovery                                                                                                                                              | 475       | Zachary Gershman |
| 8/12/20  | 0.3   | 0.3 Draft email for CKS regarding Ingram content group discovery.                                                                                                                      | 475       | Zachary Gershman |
| 8/12/20  | 0.5   | 0.5 Research Re: Ingram Content Group cases and joint employment for this matter.                                                                                                      | 475       | Zachary Gershman |
| 8/13/20  | 0.2   | 0.2 Draft email to Rosemary regarding the filing of an FAC in this matter.                                                                                                             | 475       | Zachary Gershman |
| 8/26/20  | 0.1   | 0.1 Review discovery propounded onto Plaintiff and calendar a response date.                                                                                                           | 475       | Zachary Gershman |
| 8/26/20  | 0.1   | 0.1 Respond to Rosemary's email and ask for CKS's thoughts on joint employment discovery.                                                                                              | 475       | Zachary Gershman |
| 8/26/20  | 0.2   | 0.2 Draft email back to Rosemary regarding the issue of additional discovery regarding joint employment and identifying opposing counsel for this matter.                              | 475       | Zachary Gershman |
| 8/31/20  | 0.5   | 0.5 Review discovery request edits sent back from CKS and send an email to Rosemary regarding changes to the Form Interrogatories - General                                            | 475       | Zachary Gershman |
| 8/31/20  | 0.2   | 0.2 Finalize discovery for lightning source and send to Rosemary for duplication.                                                                                                      | 475       | Zachary Gershman |
| 9/2/20   | 0.6   | 0.6 Review and provide edits to the FAC for this matter prepared by CKS.                                                                                                               | 475       | Zachary Gershman |
| 9/10/20  | 0.3   | 0.3 Review finalized discovery for this matter, approve, and send to CKS for finalization and service.                                                                                 | 475       | Zachary Gershman |
| 9/10/20  | 0.1   | 0.1 Send revised FAC to co-counsel for further edits and reviews.                                                                                                                      | 475       | Zachary Gershman |
| 9/10/20  | 0.3   | 0.3 Finalize FAC with exhibits for this matter and send to Jon for finalization.                                                                                                       | 475       | Zachary Gershman |
| 9/10/20  | 0.2   | 0.2 Review local rules of Fresno court for local rules re: status conferences for complex cases to determine topics necessary in joint report.                                         | 475       | Zachary Gershman |
| 9/10/20  | 0.7   | 0.7 Research re: amending PAGA as a matter of right such that we do not need to request a stipulation to file the FAC in this case and draft email to co-counsel regarding this issue. | 475       | Zachary Gershman |
| 9/11/20  | 0.9   | 0.9 Review Defendant's discovery interrogatories and requests in order to discuss questions with client.                                                                               | 475       | Zachary Gershman |
| 9/11/20  | 0.6   | 0.6 Telephonic Conference with client regarding discovery responses.                                                                                                                   | 475       | Zachary Gershman |
| 9/11/20  | 0.3   | 0.3 Draft email memorandum to the client regarding categories of documents that we will need regarding discovery responses.                                                            | 475       | Zachary Gershman |
| 9/12/20  | 0.1   | 0.1 Draft email correspondence to client for this matter re: obtaining documents for discovery.                                                                                        | 475       | Zachary Gershman |
| 9/23/20  | 0.1   | 0.1 Prepare for call with opposing counsel re: meet and confer for joint cmc statement.                                                                                                | 475       | Zachary Gershman |
| 9/24/20  | 1.4   | 1.4 Draft a Joint Statement for the ISC for this matter.                                                                                                                               | 475       | Zachary Gershman |
| 9/24/20  | 0.3   | 0.3 Draft Stipulation Re: ADR for this matter.                                                                                                                                         | 475       | Zachary Gershman |
| 9/25/20  | 0.1   | 0.1 Further prepare stipulation re: ADR.                                                                                                                                               | 475       | Zachary Gershman |
| 9/28/20  | 0.1   | 0.1 Review Defendant's Case Management Statement.                                                                                                                                      | 475       | Zachary Gershman |
| 10/6/20  | 0.1   | 0.1 Revise joint status conference statement to reflect it only being from Plaintiff.                                                                                                  | 475       | Zachary Gershman |
| 10/6/20  | 0.1   | 0.1 Finalize ISC statement for this matter.                                                                                                                                            | 475       | Zachary Gershman |
| 10/15/20 | 1.7   | 1.7 Draft responses to Form Interrogatories - General.                                                                                                                                 | 475       | Zachary Gershman |
| 10/15/20 | 0.1   | 0.1 Telephonic Conference with the clerk re: case management conference.                                                                                                               | 475       | Zachary Gershman |
| 10/15/20 | 3     | 3 Continue to prepare and draft discovery responses for this matter.                                                                                                                   | 475       | Zachary Gershman |
| 10/16/20 | 0.2   | 0.2 Call with Eric re: additional documents to produce.                                                                                                                                | 475       | Zachary Gershman |
| 10/16/20 | 1.8   | 1.8 Continue to prepare discovery responses.                                                                                                                                           | 475       | Zachary Gershman |
| 10/16/20 | 0.1   | 0.1 Conversation with client re: additional documents for production.                                                                                                                  | 475       | Zachary Gershman |
| 10/16/20 | 0.3   | 0.3 Continue to prepare discovery responses.                                                                                                                                           | 475       | Zachary Gershman |
| 10/17/20 | 0.8   | 0.8 Compile document production for this matter.                                                                                                                                       | 475       | Zachary Gershman |
| 10/17/20 | 2.3   | 2.3 Continue to draft responses to Defendant's discovery requests.                                                                                                                     | 475       | Zachary Gershman |
| 10/17/20 | 1.8   | 1.8 Continue to prepare discovery responses.                                                                                                                                           | 475       | Zachary Gershman |
| 10/18/20 | 0.2   | 0.2 Discussion with the client re: document production.                                                                                                                                | 475       | Zachary Gershman |
| 10/18/20 | 0.3   | 0.3 Additional review of document production provided by the client.                                                                                                                   | 475       | Zachary Gershman |
| 10/18/20 | 0.3   | 0.3 Draft email text message to the client re: document production.                                                                                                                    | 475       | Zachary Gershman |
| 10/18/20 | 0.1   | 0.1 Send email correspondence to opposing counsel re: Discovery responses.                                                                                                             | 475       | Zachary Gershman |
| 10/25/20 | 0.1   | 0.1 Discussion with client re: producing documents.                                                                                                                                    | 475       | Zachary Gershman |
| 10/27/20 | 0.2   | 0.2 Discussion re: Ingram with co-counsel about status.                                                                                                                                | 475       | Zachary Gershman |
| 10/29/20 | 1.8   | 1.8 Finishing preparing Plaintiff's discovery.                                                                                                                                         | 475       | Zachary Gershman |
| 10/29/20 | 2.4   | 2.4 Continue doc production and redaction.                                                                                                                                             | 475       | Zachary Gershman |
| 11/3/20  | 0.3   | 0.3 Continue to prepare doc production and send discovery responses and redacted production to co-counsel.                                                                             | 475       | Zachary Gershman |
| 11/4/20  | 1.8   | 1.8 Revise discovery responses.                                                                                                                                                        | 475       | Zachary Gershman |
| 11/4/20  | 0.9   | 0.9 Continue to prepare doc production.                                                                                                                                                | 475       | Zachary Gershman |
| 11/5/20  | 0.3   | 0.3 Draft verifications and finalize discovery.                                                                                                                                        | 475       | Zachary Gershman |
| 11/5/20  | 0.5   | 0.5 Complete and finalize doc production.                                                                                                                                              | 475       | Zachary Gershman |
| 11/5/20  | 0.2   | 0.2 Upload document production to server to create a shareable link and email to Rosemary so that CKS may serve responses.                                                             | 475       | Zachary Gershman |
| 11/12/20 | 0.2   | 0.2 Provide status update to the client re: mediation.                                                                                                                                 | 475       | Zachary Gershman |
| 11/16/20 | 0.2   | 0.2 Review informal document production requests sent from Rosemary and draft e-mail response.                                                                                         | 475       | Zachary Gershman |
| 11/16/20 | 0.2   | 0.2 Review informal document production request drafted by Rosemary and provide feedback.                                                                                              | 475       | Zachary Gershman |
| 2/22/21  | 0.1   | 0.1 Reach out to Eric Garcia re: status of mediation.                                                                                                                                  | 475       | Zachary Gershman |
| 2/25/21  | 0.1   | 0.1 Call with Rosemary at CKS to discuss informal discovery with OSC.                                                                                                                  | 475       | Zachary Gershman |
| 2/25/21  | 0.1   | 0.1 Draft email to co-counsel re: business expenses claim for mediation.                                                                                                               | 475       | Zachary Gershman |
| 4/21/21  | 0.6   | 0.6 Ingram Content Group review of wage statements and shift differential.                                                                                                             | 475       | Zachary Gershman |
| 4/22/21  | 0.3   | 0.3 Call and follow up call with Rosemary Khoury re: Ingram Content Group entity.                                                                                                      | 475       | Zachary Gershman |
| 4/22/21  | 0.3   | 0.3 Research re: Ingram Content Group LLC Entity.                                                                                                                                      | 475       | Zachary Gershman |
| 4/28/21  | 0.3   | 0.3 Review Defendant's CMC statement and draft email re: Plaintiff's CMC statement.                                                                                                    | 475       | Zachary Gershman |
| 4/29/21  | 6.9   | 6.9 Attend mediation for this matter.                                                                                                                                                  | 475       | Zachary Gershman |
| 4/29/21  | 0.5   | 0.5 Prepare for Ingram mediation, reviewing damages analysis and mediation brief.                                                                                                      | 475       | Zachary Gershman |
| 5/24/21  | 0.2   | 0.2 Review expenses for this matter and communicate with co-counsel.                                                                                                                   | 475       | Zachary Gershman |
| 6/16/21  | 0.2   | 0.2 Review Ingram MOU.                                                                                                                                                                 | 475       | Zachary Gershman |
| 7/12/21  | 0.1   | 0.1 Communicate with Rosemary re: Second Amended Complaint.                                                                                                                            | 475       | Zachary Gershman |
| 7/12/21  | 0.1   | 0.1 Email co-counsel Rosemary re: First Amended Complaint so that co-counsel may draft Second Amended Complaint per the settlement agreement.                                          | 475       | Zachary Gershman |
| 7/12/21  | 0.8   | 0.8 Review Second Amended Complaint for this matter.                                                                                                                                   | 475       | Zachary Gershman |
| 7/12/21  | 0.2   | 0.2 Meeting with JML Re: Second Amended Complaint for this matter.                                                                                                                     | 475       | Zachary Gershman |
| 7/15/21  | 0.2   | 0.2 Review order continuing CMC date and calendar new deadlines for CMC and case management conference statement.                                                                      | 475       | Zachary Gershman |
| 7/19/21  | 0.1   | 0.1 Meeting with JML re: Second Amended Complaint in this matter.                                                                                                                      | 475       | Zachary Gershman |
| 7/19/21  | 0.1   | 0.1 Email co-counsel re: status of Second Amended Complaint.                                                                                                                           | 475       | Zachary Gershman |
| 7/19/21  | 0.1   | 0.1 Email co-counsel re: SAC.                                                                                                                                                          | 475       | Zachary Gershman |
| 11/1/21  | 0.3   | 0.3 Prepare declaration iso preliminary approval for JML and ZTG.                                                                                                                      | 475       | Zachary Gershman |
| 11/1/21  | 0.1   | 0.1 Communicate with JML re declaration iso preliminary approval in this action.                                                                                                       | 475       | Zachary Gershman |
| 11/1/21  | 0.3   | 0.3 Finalize declaration iso preliminary approval and email to co-counsel for inclusion in preliminary approval motion.                                                                | 475       | Zachary Gershman |
| 11/17/21 | 0.1   | 0.1 Communicate with JML re preliminary approval motion for this matter and contact with class members.                                                                                | 475       | Zachary Gershman |
| 11/29/21 | 0.1   | 0.1 Email co-counsel re: preliminary approval motion.                                                                                                                                  | 475       | Zachary Gershman |
| 11/29/21 | 0.5   | 0.5 Review and finalize declaration iso preliminary approval.                                                                                                                          | 475       | Zachary Gershman |
| 12/15/21 | 0.1   | 0.1 Review order re: continuance of CMC and calendar new date.                                                                                                                         | 475       | Zachary Gershman |
| 5/2/22   | 0.2   | 0.2 Review tentative ruling re hearing on preliminary motion for approval.                                                                                                             | 475       | Zachary Gershman |
| 5/2/22   | 0.1   | 0.1 Review correspondence from co-counsel regarding tentative ruling on MPA.                                                                                                           | 475       | Zachary Gershman |
| 5/10/22  | 0.2   | 0.2 Communicate with JML regarding MPA and next steps.                                                                                                                                 | 475       | Zachary Gershman |
| 5/22/22  | 0.2   | 0.2 Check status of case and calendar CMC.                                                                                                                                             | 475       | Zachary Gershman |
| 5/24/22  | 0.2   | 0.2 Calendar new preliminary approval motion date.                                                                                                                                     | 475       | Zachary Gershman |
| 6/5/22   | 0.2   | 0.2 Check status of mpa.                                                                                                                                                               | 475       | Zachary Gershman |
| 6/9/22   | 0.3   | 0.3 Review tentative decision re preliminary approval.                                                                                                                                 | 475       | Zachary Gershman |
| 6/16/22  | 0.2   | 0.2 Email co-counsel re: preliminary approval changes.                                                                                                                                 | 475       | Zachary Gershman |
| 6/20/22  | 0.2   | 0.2 Meeting with JML regarding status of MPA in this matter.                                                                                                                           | 475       | Zachary Gershman |
| 7/7/22   | 0.1   | 0.1 Review status of MPA.                                                                                                                                                              | 475       | Zachary Gershman |
| 7/14/22  | 0.2   | 0.2 Email co-counsel re declaration from Defendant and CMC.                                                                                                                            | 475       | Zachary Gershman |
| 7/25/22  | 0.1   | 0.1 Review email re: Ingram preliminary approval.                                                                                                                                      | 475       | Zachary Gershman |
| 8/4/22   | 0.1   | 0.1 Review signed declaration from OSC re mpa.                                                                                                                                         | 475       | Zachary Gershman |
| 8/17/22  | 0.1   | 0.1 Communicate in firm with paralegal re calendared dates for MPA.                                                                                                                    | 475       | Zachary Gershman |
| 10/12/22 | 0.1   | 0.1 Communicate with paralegal re status of appearances at preliminary approval hearing.                                                                                               | 475       | Zachary Gershman |
| 11/16/22 | 0.1   | 0.1 Review tentative in this matter regarding preliminary approval.                                                                                                                    | 475       | Zachary Gershman |
| 11/28/22 | 0.1   | 0.1 Review email from settlement administrator.                                                                                                                                        | 475       | Zachary Gershman |
| 12/5/22  | 0.1   | 0.1 Communicate with JML regarding final approval hearing.                                                                                                                             | 475       | Zachary Gershman |
| 12/8/22  | 0.1   | 0.1 Review email from settlement administrator regarding status.                                                                                                                       | 475       | Zachary Gershman |
| 1/22/23  | 0.5   | 0.5 Check status of case and final approval motion.                                                                                                                                    | 475       | Zachary Gershman |
| 1/24/23  | 0.2   | 0.2 Review notice of reassignment and transmit internally.                                                                                                                             | 475       | Zachary Gershman |
| 1/26/23  | 0.5   | 0.5 Research re newly assigned judge.                                                                                                                                                  | 475       | Zachary Gershman |
| 2/9/23   | 0.4   | 0.4 Review settlement administrator email and proposed notice.                                                                                                                         | 475       | Zachary Gershman |
| 2/10/23  | 0.2   | 0.2 Further review mailing docs and communicate with co counsel regarding the same.                                                                                                    | 475       | Zachary Gershman |
| 2/16/23  | 0.2   | 0.2 Email co-counsel re mailing documents.                                                                                                                                             | 475       | Zachary Gershman |
| 2/16/23  | 0.3   | 0.3 Email OSC regarding mailing documents.                                                                                                                                             | 475       | Zachary Gershman |
| 2/16/23  | 0.1   | 0.1 Review email from co-counsel re mailing documents.                                                                                                                                 | 475       | Zachary Gershman |
| 2/17/23  | 0.2   | 0.2 Review email re new response deadline.                                                                                                                                             | 475       | Zachary Gershman |
| 3/7/23   | 0.2   | 0.2 Communicate with co-counsel regarding final approval hearing.                                                                                                                      | 475       | Zachary Gershman |
| 3/7/23   | 0.2   | 0.2 Follow up email with co-counsel re new final approval deadline and date.                                                                                                           | 475       | Zachary Gershman |
| 3/7/23   | 0.4   | 0.4 Review stip and send back to co-counsel re final approval.                                                                                                                         | 475       | Zachary Gershman |
| 3/15/23  | 0.1   | 0.1 Review email correspondence regarding additional mailing documents.                                                                                                                | 475       | Zachary Gershman |
| 3/16/23  | 0.1   | 0.1 Communicate with paralegal re new deadlines for final approval of settlement.                                                                                                      | 475       | Zachary Gershman |
| 4/6/23   | 0.2   | 0.2 Review weekly report.                                                                                                                                                              | 475       | Zachary Gershman |
| 4/18/23  | 0.3   | 0.3 Review stip re final approval motion.                                                                                                                                              | 475       | Zachary Gershman |
| 4/21/23  | 0.1   | 0.1 Review weekly report.                                                                                                                                                              | 475       | Zachary Gershman |
| 4/28/23  | 0.1   | 0.1 Review weekly report.                                                                                                                                                              | 475       | Zachary Gershman |
| 5/9/23   | 0.2   | 0.2 Email co-counsel re final approval.                                                                                                                                                | 475       | Zachary Gershman |
| 5/9/23   | 0.1   | 0.1 Review weekly report.                                                                                                                                                              | 475       | Zachary Gershman |
| 5/10/23  | 0.3   | 0.3 Email co-counsel re motion for final approval.                                                                                                                                     | 475       | Zachary Gershman |
| 5/10/23  | 0.1   | 0.1 Review weekly report re final approval.                                                                                                                                            | 475       | Zachary Gershman |
| 5/11/23  | 0.1   | 0.1 Communicate with paralegal re costs.                                                                                                                                               | 475       | Zachary Gershman |
| 5/11/23  | 0.4   | 0.4 Review costs in this matter, verify, and communicate with co-counsel regarding same.                                                                                               | 475       | Zachary Gershman |
| 5/11/23  | 0.1   | 0.1 Review email regarding settlement payout figures.                                                                                                                                  | 475       | Zachary Gershman |
| 5/12/23  | 1     | 1 Begin reviewing MFA and associated documents.                                                                                                                                        | 475       | Zachary Gershman |
| 5/15/23  | 0.6   | 0.6 Revise MFA.                                                                                                                                                                        | 475       | Zachary Gershman |
| 5/15/23  | 0.2   | 0.2 Communicate with OSC re MFA.                                                                                                                                                       | 475       | Zachary Gershman |
| 5/15/23  | 0.2   | 0.2 Email co-counsel re next steps for MFA.                                                                                                                                            | 475       | Zachary Gershman |
| 5/16/23  | 1.9   | 1.9 Review and revise MFA docs.                                                                                                                                                        | 475       | Zachary Gershman |
| 5/16/23  | 1.6   | 1.6 Draft dec in support of MFA.                                                                                                                                                       | 475       | Zachary Gershman |
| 5/18/23  | 1.2   | 1.2 Finish preparing declaration iso MFA.                                                                                                                                              | 475       | Zachary Gershman |
| 65.8     |       |                                                                                                                                                                                        |           |                  |