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Attorneys for Plaintiffs DAVID GOLD and NELSON HOANG, on behalf of themselves and all other aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

DAVID GOLD, an individual; NELSON	) CASE NO. 20PSCV00650
HOANG, an individual, on behalf of themselves	)
and other aggrieved employees,	) [Assigned for all purposes to the Hon.
	) Thomas C. Falls, Dept. R]
Plaintiffs,	)
	) RESERVATION ID. # 951495841042
v.	)
	) DECLARATION OF ROSS E.
UNITED IMPORTS OF PUENTE HILLS,	) SHANBERG IN SUPPORT OF MOTION
INC., a California corporation; UNITED	) TO APPROVE PAGA SETTLEMENT
IMPORTS FINANCIAL OF NORTH	)
AMERICA, a California corporation; and	) Date: October 20, 2022
DOES 1 through 100, inclusive,	) Time: 10:00 a.m.
	) Dept.: R
Defendants.	)
	)

I, Ross E. Shanberg, declare:

2. I graduated from the University of California at Berkeley in 1992 with a Bachelor of Sciences degree in Business Administration and graduated from the California Western School of Law in 1995. Since becoming a lawyer in 1995, my practice has focused on complex litigation matters, and for the last approximately 15 years, complex employment law and wage and hour matters.

4. Throughout this case, which has been pending for 2 years, my firm and I have been involved in all aspects of discovery, motion practice, court hearings, and witness interviews and outreach. We have acted diligently in all aspects of the case to achieve the \$150,000 settlement reached with Defendants, which we wholeheartedly support.

a. *Wilkins, et al. v. Equinox Holdings, Inc.*

Los Angeles Superior Court, No.: BC440058

b. *TBC Retail Group Wage and Hour Cases*

Los Angeles Superior Court, No.: JCCP No. 4701

c. *Casserly v. Randstad US, L.P., et al.*

United States District Court, Central District of California

Case No. SACV 12-1023-DOC(ANx)

- d. *Crilly v. Micro Electronics, Inc.*
Orange County Superior Court, No.: 30-2013-00662586-CU-OE-CXC
- e. *Concho, et al. v. Pipeline Carriers, Inc. et al.*
Orange County Superior Court, No.:30:2013-00649600-DU-OE-CXC
- f. *Holsted et al. v. R.J. Noble Company et. al.*
Orange County Superior Court, No.:30:2010-00379770-CU-OE-CXC
- g. *Piggue v. Chief Protective Services, Inc.*
Orange County Superior Court, No.:30-2013-00688107-CU-OE-CXC
- h. *Walsh v. Pacific Bell Telephone Company*
Orange County Superior Court, No.:30-2011-00498062-CU-OE-CXC
- i. *Woods v. JFK Memorial Hospital*
Riverside County Superior Court, No.: INC 1205209
- j. *Ramirez et. al v. Titan Insurance of New Mexico*
Riverside County Superior Court, No.: RIC1211890
- k. *DeSantos v. Jaco Oil Company, et al.*
U.S.D.C. Eastern District of California, No. 1:14-CV-00738-JLT
- l. *Duran v. Big 5 Corp.*
Los Angeles Superior Court, No.: BC557154
- m. *Sheahan v. Celtic Leasing Corporation, Inc.*
Orange County Superior Court No.: 30-2016-00852151-CU-OE-CXC
- n. *Panasis v. Control4 Corporation*
United States District Court, Central District of California
Case No. SACV-16-1179-DOC
- o. *O&R Construction, LLC v. Dun & Bradstreet, et al.*
United States District Court, Western District of Washington
Case No. C12-2184 TSZ
- p. *Matthews v. Whelan Security of California, Inc.*
Orange County Superior Court, No.: 30-2016-00833250-CU-OE-CXC
- q. *Rodriguez v. R.J. Noble Company (Navarro/Kles/Arango/Rocha)*
Orange County Superior Court, No.: 30-2017-00916018-CU-OE-CXC
- r. *Davis v. Pacific Bell Telephone Company (Medina)*
Orange County Superior Court, No.: 30-2017-00955740-CU-OE-CXC

- s. *Evans v. Select Portfolio Servicing, Inc. et al. (Beher)*
United States District Court, Eastern District of New York
Case No. 2:18-CV-05985-PKC-RML
- t. *Mariscal v. Munger Bros, LLC et al.*
San Joaquin Superior Court, No.: STK-CV-UOE-2020-4639
- u. *Imperato v. California Commerce Club, Inc.*
Los Angeles Superior Court, No.: 20STCB25314
- v. *Skerl v. Sutter Valley Hospitals et al.*
San Francisco Superior Court, No.: CGC-20-585671
- q. *Roark v. Sutter Bay Hospitals dba Mills Peninsula Medical Center*
San Mateo Superior Court, No.: 21-CIV-02057
- r. *Forney v. CHCM, Inc. dba College Hospital Costa Mesa*
Orange County Superior Court , No.: 30-2021-01229774-CU-OC-CXC
- s. *DeSimone v. Select Portfolio Servicing, Inc. (Rogers)*
United States District Court, Eastern District of New York
Case No.: 20-CV-3837-PKC-TAM

6. During my 26-year career, I have handled many successful employment law matters both at the trial and appellate levels. I estimate that I have represented plaintiffs in over 100 different wage and hour cases, the vast majority of which have resulted in favorable settlements, awards and/or verdicts for my clients. I have successfully prosecuted and obtained significant recoveries in several class action lawsuits and other lawsuits involving complex legal and factual issues. In 2013, I served as class counsel in the above-referenced *Wilkins* case which settled for \$5,500,000 and the above-referenced *Casserly* case which settled for \$4,900,000. I also settled the above-described *Walsh v. Pacific Bell* case for \$16.8 million on behalf of over 4,000 customer service representatives.

7. I served as co-lead counsel in the matter of *Pellegrino v. Robert Half international Inc.*, Orange County Superior Court Case No. 06CC04518, a wage and hour case filed on behalf of 6 recruiters in which I obtained an award in excess of 1.6 million dollars for my clients. The *Pellegrino* case was affirmed on appeal on January 28, 2010, and was one of the first, if not the first and only published decision in California (182 Cal. App. 4th 278) holding that recruiters are non-exempt employees who are not subject to California's administrative exemption set forth in Industrial Welfare Commission Wage Order 4-2001. The Supreme Court previously granted a

1 review and hold of the *Pellegrino* case, and the matter was transferred back to the Court of Appeal
2 for reconsideration. Shortly after the transfer, the case was settled by the parties, resulting in a
3 payment to our clients which exceeded the amount of the judgment and which was extremely
4 favorable.

5 8. I am AV rated by Martindale-Hubbell, the highest possible rating for a lawyer.
6 have also been selected as a *Super Lawyer* each year from 2015 - 2022. I am also a member of the
7 California State Bar, Orange County Bar Association, Employment Law Section, the California
8 Employment Lawyer's Association ("CELA"), and a member of the Robert A. Banyard Inns of
9 Court.

10 9. My partner, Shane C. Stafford, graduated from Virginia Polytechnic Institute and
11 State University in 1994, with a degree in Liberal Arts. Mr. Stafford graduated Summa Cum
12 Laude from Whittier Law School in 2001. Mr. Stafford was admitted to the California State Bar
13 and the United States Court of Appeals for the Ninth Circuit in December 2001, and the District of
14 Columbia Bar in February 2005. Upon graduation in 2001, Mr. Stafford began working for
15 Stanzler Funderburk & Castellon LLP, a business litigation firm located in San Francisco, with a
16 branch in downtown Los Angeles. Mr. Stafford practiced general civil litigation, including
17 business disputes, intellectual property litigation, insurance coverage matters, and employment
18 litigation. Mr. Stafford has practiced almost exclusively in the area of employment law since
19 2005.

20 10. Through September 16, 2022, Shanberg Stafford LLP has spent 125.50 hours on
21 this case and has incurred approximately \$85,170.00 in fees. My firm's billing rate for partners,
22 Ross Shanberg (RES), Shane Stafford (SCS) and Aaron Bartz (AAB) was \$675 per hour until
23 January 1, 2022 when the partner rate was raised to \$750 per hour. This case was filed in 2020.
24 Our associate billing rate on this file is \$375, and paralegals and law clerks billed between \$175
25 and \$225 per hour. The fees incurred were reasonable and necessary in order to prosecute this
26 case. PAGA Counsel is requesting attorneys' fees of \$50,000, or one-third of the gross settlement
27 amount. PAGA Counsel's lodestar far exceeds the amount of attorneys' fees requested, and the
28 collective lodestar for Plaintiff's counsel exceeds \$140,000. I therefore believe that pursuant to
Lealao v. Beneficial California, Inc., 82 Cal.App.4th 19 (2000), that the fee request in this case is
fair and reasonable in view of the typical common fund attorneys' fees awards and similar
California representative action settlements. Attached as **Exhibit 1** is a true and correct copy of
my law firm's attorneys' fees billing statements incurred in this class action.

11. My firm has also incurred \$10,691.40 litigation costs. Attached as **Exhibit 2** is a true and correct copy of the expenses incurred by Shanberg Stafford LLP.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Executed on September 21, 2022, at Newport Beach, California.

/s/ Ross E. Shanberg /s/
Ross E. Shanberg

EXHIBIT 1

Selection Criteria

Slip.Transaction Date 1/1/2020 - 9/16/2022
 Clie.Selection Include: David Gold v. PH Mitsubishi
 Slip.Transaction Type Time
 Slip.Classification Open

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
42341	TIME	AAB	4.20	675.00	2835.00
7/27/2020		Preparation	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Prepare PAGA letter, and research in support of same; Review, revise and final letter for filing and service.			0.00		
42432	TIME	AAB	3.20	675.00	2160.00
8/26/2020		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider employment records of clients, and review legal strategies regarding same.			0.00		
42568	TIME	AAB	4.50	675.00	3037.50
9/29/2020		Preparation	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Prepare PAGA Complaint.			0.00		
42586	TIME	AAB	3.50	675.00	2362.50
10/2/2020		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and revise Complaint, and prepare other initiating documents.			0.00		
42790	TIME	AAB	0.50	675.00	337.50
12/1/2020		Telephone call	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Telephone call with witness regarding PH Mitsubishi and pay practices, and email regarding same.			0.00		
42931	TIME	AAB	1.00	675.00	675.00
1/19/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider legal strategies, and conference call with client regarding same.			0.00		

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Slip Listing

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
43014	TIME	AAB	2.50	675.00	1687.50
2/18/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider discovery responses, and prepare meet and confer letter regarding same; Review of document production.			0.00		
43028	TIME	AAB	1.00	675.00	675.00
2/25/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Prepare email to OPC, and review and respond to emails regarding discovery; Further review of client documents and research regarding legal strategies.			0.00		
43032	TIME	AAB	1.00	675.00	675.00
2/26/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider case documents in preparation for CMC.			0.00		
43033	TIME	AAB	1.30	675.00	877.50
3/1/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider pleadings and court filings in preparation for CMC; Attend telephonic CMC, and prepare memo regarding same.			0.00		
43059	TIME	AAB	1.00	675.00	675.00
3/10/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider discovery responses and related case documents; Conference call with OPC regarding discovery and possible Mediation.			0.00		
43139	TIME	AAB	1.50	675.00	1012.50
3/31/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider mediation strategies, and calls with clients regarding same; Review and respond to emails regarding same.			0.00		
43192	TIME	AAB	1.10	675.00	742.50
4/19/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider mediation documents, and prepare emails regarding same; Prepare mediation data demand.			0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
43602	TIME	AAB	3.00	675.00	2025.00
7/1/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider client documents and Defendant's data production in advance of Mediation; Call with expert regarding same.			0.00		
43645	TIME	AAB	2.50	675.00	1687.50
7/12/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider case documents, and research in support of claims against Defendants; Begin preparing Mediation Brief.			0.00		
43647	TIME	AAB	5.50	675.00	3712.50
7/13/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider client documents in preparation of Mediation, and review damages analysis; Prepare Mediation Brief.			0.00		
43652	TIME	AAB	5.60	675.00	3780.00
7/14/2021		Research	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Research in support of Mediation; Prepare Mediation Brief, and review and revise same; Review and prepare exhibits for submission with brief.			0.00		
43657	TIME	AAB	4.40	675.00	2970.00
7/15/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review of damages analysis, and conference calls with expert regarding same; Research case law in preparation for Mediation.			0.00		
43661	TIME	AAB	3.20	675.00	2160.00
7/16/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider further Mediation records, and analyze same; Review, revise and final Mediation Brief, and prepare email regarding same.			0.00		
43666	TIME	AAB	1.50	675.00	1012.50
7/19/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider Mediation data and payroll records, and prepare for Mediation.			0.00		

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		
43670	TIME	AAB	4.20	675.00	2835.00
7/20/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider client documents and other mediation materials in advance of Mediation; Conference call with N. Hoang regarding Mediation, and respond to emails from clients regarding Mediation.			0.00		
43689	TIME	RES	7.50	675.00	5062.50
7/22/2021		Mediation	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Preparation for and attend Mediation			0.00		
43690	TIME	AAB	8.00	675.00	5400.00
7/22/2021		Research	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Research regarding PAGA claims, and potential paystub defenses in advance of Mediation; Attend Mediation, and conference calls with clients post-Mediation regarding settlement strategies.			0.00		
43697	TIME	AAB	0.50	675.00	337.50
7/26/2021		Telephone call	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Telephone call with client regarding status, and review settlement strategies regarding case.			0.00		
43739	TIME	RES	0.30	675.00	202.50
8/3/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and exchange emails re settlement; discuss further settlement strategy with AAB re same			0.00		
43743	TIME	AAB	0.50	675.00	337.50
8/3/2021		Telephone call	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Telephone call with mediator regarding potential settlement; Confer with RES regarding settlement strategies.			0.00		
43841	TIME	AAB	0.50	675.00	337.50
8/10/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review of settlement strategies, and review and respond to email from Mediator.			0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
43844	TIME	AAB	2.50	675.00	1687.50
8/11/2021		Research	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Research regarding individual liability in PAGA actions.			0.00		
43897	TIME	AAB	0.60	675.00	405.00
8/18/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review settlement strategies, and review and respond to emails from Mediator.			0.00		
43910	TIME	AAB	1.50	675.00	1012.50
8/23/2021		Preparation	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Prepare Belaire -West Notice, and Doe Amendment; Review and consider discovery issues, and prepare email to OPC regarding same.			0.00		
43937	TIME	AAB	0.70	675.00	472.50
8/30/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review of Notice of Reassignment, and research regarding new judge; Prepare Notice, and evaluate discovery and legal strategies.			0.00		
43940	TIME	Paralegal	0.30	175.00	52.50
8/30/2021		Preparation	0.00	T@1	
WIP		David Gold v. PH Mitsu	0.00		
Preparation of Notice of Reassignment			0.00		
43981	TIME	AAB	1.00	675.00	675.00
9/1/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider discovery issues in preparation for conference call, and meet and confer call with OPC regarding outstanding discovery; Prepare email to OPC regarding same.			0.00		
44042	TIME	AAB	0.60	675.00	405.00
9/16/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review of settlement strategies, and call with mediator regarding same.			0.00		
44106	TIME	AAB	1.50	675.00	1012.50
10/5/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		

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		
Review and revise Stipulated Protective Order, and confer with co-counsel regarding same.			0.00		
44162	TIME	AAB	0.50	675.00	337.50
10/15/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider case strategies, and conference call with client regarding same.			0.00		
44194	TIME	AAB	0.60	675.00	405.00
10/28/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review of email from Mediator, and prepare response to same; Conference call with D. Gold regarding case.			0.00		
44273	TIME	AAB	1.50	675.00	1012.50
11/10/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider paystubs and related personnel documents for witness J. Wang , and conference call with witness regarding employment with United Imports.			0.00		
44313	TIME	AAB	1.00	675.00	675.00
11/23/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review of Belaire -West disclosure, and call with witness J. Wang regarding same; Review further litigation strategies.			0.00		
44338	TIME	AAB	1.50	675.00	1012.50
11/29/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Prepare correspondence to opposing counsel regarding meet and confer ; Review Belaire -West list of witnesses, and review outreach strategies; Conference call with client regarding same.			0.00		
44384	TIME	AAB	1.50	675.00	1012.50
12/6/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider discovery issues, and related litigation strategies; Call and email OPC regarding same; Review witness intakes, and prepare memo regarding same.			0.00		

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		
44393	TIME	AAB	1.50	675.00	1012.50
12/8/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider discovery issues, and review and respond to email from K. Holloway ; Research regarding discovery issues; Calls with client J. Wang regarding status of case.			0.00		
44414	TIME	AAB	1.50	675.00	1012.50
12/13/2021		Research	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Research regarding discovery issues, and prepare memo regarding same.			0.00		
44421	TIME	AAB	3.60	675.00	2430.00
12/14/2021		Telephone call	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Telephone call with opposing counsel regarding various discovery issues; Review witness list, and randomize same; Research regarding amending pleadings, and relation back; Prepare email to opposing counsel, and review and respond to emails regarding same; Calls with witnesses.			0.00		
44432	TIME	AAB	3.00	675.00	2025.00
12/15/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider witness intakes, and calls with witnesses regarding pay issues; Research regarding PAGA and amending pleadings and submitting updated PAGA letter.			0.00		
44469	TIME	AAB	0.60	675.00	405.00
12/28/2021		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and consider legal strategies, and prepare Doe Amendment 2 for Infiniti dealership.			0.00		
44933	TIME	RES	1.80	750.00	1350.00
5/18/2022		Conference	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Conference with co counsel AAB re Def attempt to settle other PAGA action; review court filings re othe potential PAGA cases against Defendant; review email from AAB to OPC re reverse auction settlement and possible objection; review OPC Nunes			0.00		

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		
44947	TIME	RES	3.30	750.00	2475.00
5/23/2022		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Prior review and analysis of related Rodas case; conferences with AAB re same and possible settlement of overlapping Rodas case; review and analyze Rodas complaint and PAGA letter; prepare for phone call with Rodas counsel, Tony Nunes ; phone call with AAB and Nunes re possible collusive settlement, status, and further strategy			0.00		
45027	TIME	RES	3.10	750.00	2325.00
6/6/2022		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and exchange emails with counsel for Rodas re possible mediation and intervention; prior conferences with AAB re same; review draft declarations prepared by AAB ISO intervention; phone conference with AAB re suggestion by Rodas for tripartite mediation and intervention			0.00		
45052	TIME	Paralegal	2.40	175.00	420.00
6/13/2022		Draft	0.00	T@1	
WIP		David Gold v. PH Mitsu	0.00		
Draft Intervention Motion Tables			0.00		
45177	TIME	RES	3.30	750.00	2475.00
7/25/2022		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review file in preparation for mediation; review brief and damage analysis			0.00		
45178	TIME	RES	8.00	750.00	6000.00
7/26/2022		Mediation	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Attend Mediation			0.00		
45206	TIME	RES	1.50	750.00	1125.00
8/1/2022		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and exchange emails with AAB (prior) re settlement agr. ; review draft SA prepared by AAB ; exchagne emails re same			0.00		
45207	TIME	RES	0.40	750.00	300.00
8/3/2022		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review further draft of PAGA settlement agr. ; review			0.00		

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Slip Listing

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
email from AAB re same					
45379	TIME	RES	0.30	750.00	225.00
8/23/2022		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and exchange emails with co counsel AAB re OPC comments to PAGA settlement agreement and distribution sequence; review agreement re same			0.00		
45380	TIME	RES	0.30	750.00	225.00
8/24/2022		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and exchange further emails with co counsel and OPC re PAGA settlement terms; review further draft of agreement			0.00		
45381	TIME	RES	0.20	750.00	150.00
9/10/2022		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review and exchange further emails re PAGA settlement agreement and execution by principals			0.00		
45382	TIME	RES	1.90	750.00	1425.00
9/16/2022		Review	0.00	C@1	
WIP		David Gold v. PH Mitsu	0.00		
Review draft motion for preliminary approval prepared by AAB and Decl of AAB in support of motion; prepare suggested revisions to AAB for motion; exchange emails re same; begin preparation of RES declaration in support of fee application			0.00		
Grand Total		Billable	125.50		85170.00
		Unbillable	0.00		0.00
		Total	125.50		85170.00

EXHIBIT 2

Selection Criteria

Slip.Transaction Date 1/1/2020 - 9/16/2022
 Clie.Selection Include: David Gold v. PH Mitsubishi
 Slip.Transaction Type Expense
 Slip.Classification Open

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
42340 EXP 7/28/2020 WIP PAGA Filing Fee	JC Filing Fees David Gold v. PH Mitsu	1	75.00	75.00
42591 EXP 10/5/2020 WIP Complaint, Civil Case Cover Sheet, Summons	JC Filing Fees David Gold v. PH Mitsu	1	463.51	463.51
42641 EXP 10/15/2020 WIP Notice of Case Management Conference	JC Filing Fees David Gold v. PH Mitsu	1	14.15	14.15
42642 EXP 10/15/2020 WIP Notice & Acknowledgement of Receipt (United Imports Financial of North America)	JC Filing Fees David Gold v. PH Mitsu	1	14.15	14.15
42643 EXP 10/15/2020 WIP Notice & Acknowledgement of Receipt (United Imports of Puente Hills)	JC Filing Fees David Gold v. PH Mitsu	1	14.15	14.15
42702 EXP 10/30/2020 WIP Personal service of Summons, Complaint, Civil Case Cover Sheet, ADR Packet, Notice of Case Assignment on United Imports of Puente Hills, Inc and United Imports Financial of North America	JC Service Fee David Gold v. PH Mitsu	1	214.90	214.90

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Slip Listing

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
43004	EXP	JC	1	16.20	16.20
2/16/2021		Filing Fees			
WIP		David Gold v. PH Mitsu			
Case Management Statement					
43038	EXP	JC	1	171.10	171.10
3/2/2021		Filing Fees			
WIP		David Gold v. PH Mitsu			
Filing Fees: Notice of Posting Jury Fees					
43050	EXP	JC	1	15.00	15.00
3/8/2021		Appearance Fee			
WIP		David Gold v. PH Mitsu			
LA Court Connect Remote Audio Appearance -					
Case Management Conference					
43521	EXP	JC	1	6250.00	6250.00
6/18/2021		Mediation			
WIP		David Gold v. PH Mitsu			
Judicable West mediation reservation fees.					
43762	EXP	JC	1	55.16	55.16
7/22/2021		LEXIS			
WIP		David Gold v. PH Mitsu			
Pedram/Peter Amin Advanced Person Searches &					
Comprehensive Accurant Reports					
43919	EXP	JC	1	16.68	16.68
8/25/2021		Filing Fees			
WIP		David Gold v. PH Mitsu			
Amendment to Complaint (Fictitious/Incorrect					
Name) Filing Fees					
43922	EXP	AAB	1	400.00	400.00
8/26/2021		Expert Fees			
WIP		David Gold v. PH Mitsu			
Expert Fees re: Damages Analysis.					
43941	EXP	JC	1	16.68	16.68
8/30/2021		Filing Fees			
WIP		David Gold v. PH Mitsu			
Notice of Reassignment Filing Fees					
44471	EXP	JC	1	16.68	16.68
12/29/2021		Filing Fees			
WIP		David Gold v. PH Mitsu			
Amendment to Complaint - Fictitious Name (Capitol					
Infiniti USA, Inc.) Filing Fees					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
44515	EXP	JC	1	16.68	16.68
1/13/2022		Filing Fees			
WIP		David Gold v. PH Mitsu			
Notice of Change of Firm Name Filing Fees					
45078	EXP	JC	1	17.19	17.19
6/28/2022		Filing Fees			
WIP		David Gold v. PH Mitsu			
Notice of Change of Address Filing Fees					
45140	EXP	JC	1	2904.17	2904.17
7/14/2022		Mediation			
WIP		David Gold v. PH Mitsu			
JAMS Mediation fees.					
Grand Total					
			Billable	0.00	10691.40
			Unbillable	0.00	0.00
			Total	0.00	10691.40