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Attorneys for Plaintiffs VIVIAN LY, WENDY
MACIEL, and RENE PALACIOS, on behalf of
themselves and others similarly Aggrieved Employees

Plaintiffs' Counsel continued on next page

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SACRAMENTO

VIVIAN LY, on behalf of herself and others
similarly situated,

Plaintiff,

v.

PRIME COMMS RETAIL, LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 34-2020-00281668

**DECLARATION OF KEVIN T. BARNES IN
SUPPORT OF PLAINTIFFS' MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Date: November 16, 2021

Time: 9:00 a.m.

Place: Dept. 54

Reservation No. 2591498

Raphael A. Katri, Esq. (#221941)
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Attorneys for Plaintiffs VIVIAN LY, WENDY
MACIEL, and RENE PALACIOS, on behalf of
themselves and others similarly Aggrieved Employees

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1. I am an attorney licensed to practice before all courts of the State of California. I am co-counsel for the Plaintiff herein and have personal knowledge of the facts thereto.

2. If called as a witness, I could and would competently testify herein. I am co-counsel on the above entitled case and have worked with the Sansanowicz Law Group, P.C. in the litigation of this case.

3. I graduated from the University of Colorado at Boulder in 1985 with a degree in Business Administration and Real Estate. I graduated from Loyola Law School of Los Angeles in 1988. I am currently the managing partner in The Law Offices of Kevin T. Barnes in Los Angeles. I am admitted to practice before the following Courts: United States Court of Appeal, Ninth Circuit; United States District Court- Northern, Central, and Eastern Districts of California; United States District Court- District of Colorado, United States District Court- Fourth Circuit; all of California State Courts; and the United States Supreme Court. I have an AV rating with Martindale Hubbell.

4. In 1997, I was one of the first attorneys in the State of California to represent a plaintiff in a class action wage and hour case, specifically the case of Amezcuca, et. al. v. Trak Auto Corporation, Los Angeles County Superior Court Case No. BC183900 coordinated with Tett v. Trak Auto Corporation, Los Angeles County Superior Court Case No. BC186931. Since that time, my firm has been hired by many plaintiffs and law firms to serve as class counsel in such cases. Few, if any, attorneys in California are more experienced in wage and hour class action cases than my firm.

5. I have been invited on numerous occasions to speak on class action and wage-and-hour employment issues. I have spoken at seminars by the Labor and Employment Section of the Los Angeles County Bar Association, various labor lawyer associations, mediator seminars and Nuts & Bolts seminars for new lawyers. I was selected as one of the top 10 Plaintiff Labor and Employment Attorneys in 2008 by the Daily Journal and the top 75 Labor and Employment Attorneys in 2017 by the Daily Journal. I have been selected as a Southern California Super

1 Lawyer from 2007-2021 in Employment and Labor. This recognition is a selection by my peers
2 based upon ethics, experience and reputation and represents the top 5% of our profession. I am
3 also AV rated by Martindale-Hubbell, the highest possible rating for a lawyer.

4 6. In 2008 I tried with Joseph Antonelli the case of Mutuc v. Huntington Memorial
5 Hospital, Case number BC288727. This is one of the few wage and hour class action cases tried
6 in the state of California. Judge William A. MacLaughlin Issued a Statement of Decision
7 awarding Plaintiffs' \$32.8 million which led to a \$60 million lump sum settlement. Also in 2008,
8 I tried another wage and hour class action entitled Solis v. Worldwide Network, Inc., et al.,
9 Orange County Superior Court Case no. 03CC00069, before Hon. Ronald L. Bauer, which
10 resulted in judgment in favor of Defendant Worldwide Network, Inc. I also tried a third class
11 action in San Diego in December 2016.

12 7. My firm has also been involved in numerous favorable appellate court decisions
13 which have been very important in wage and hour class action law. These appellate decisions
14 include the following cases:

- 15 a. Huntington Memorial Hospital v. Superior Court (2005) 131 Cal.App.4th 893 (a
16 landmark decisions regarding the manner in which the regular rate must be
17 calculated and what is considered a "subterfuge" to avoid the correct payment of
18 the regular rate and overtime rate);
- 19 b. Tien v. Sup. Ct. (Tenet Healthcare) (2006) 139 Cal.App.4th 528 (protecting the
20 interest of putative class members in a wage and hour case who want their identity
21 protected);
- 22 c. Jaimez v. Daiohs USA, Inc. (2010) 181 Cal.App.4th 1286 (the criteria required to
23 certify pay stub claims, waiting time penalty claims, and meal and break claims
24 among other matters);
- 25 d. Williams v Superior Court (Allstate) (2013) 221 Cal.App.4th 1353 (confirms
26 several important legal theories which support certification regarding common
27 questions);
- 28 e. Cochran v. Schwan's Home Service, Inc. (2014) 228 Cal.App.4th 1137 (one of

the first California cases to consider the California Supreme Court decision in Duran v. U.S. National Bank Association (2014) 59 Cal.4th 1, holding that plaintiffs can use statistical sampling evidence to establish either liability or damages in a wage and hour class action case. The Schwan's opinion is also a seminal case regarding an employers' obligation to reimburse employees' business expenses under California Labor Code §2802); and

- f. Laffitte v. Robert Half International Inc. (2014) 231 Cal.App.4th 860 (Review granted and Opinion superseded by Laffitte v. Robert Half Intern., 342 P.3d 1232, February 25, 2015) (use of a common fund recovery for attorneys' fees in class action cases). I argued this case to the California Supreme Court on May 27, 2016 and the court ruled in Plaintiffs favor in a precedent setting decision on the award of attorneys' fees under the common fund doctrine.
- g. Vaquero v. Ashley Furniture Industries Inc., 824 F.3d 1150 (9th Cir. 2016) (limits the impact of *Wal-Mart v. Dukes*, 564 U.S. 338 (2011) with respect to the issue of commonality, limits the impact of *Comcast v. Behrend*, 133 S.Ct. 1426 (2013) with respect to predominance and underscores the 9th Circuit rule that the need for individualized finding with respect to damages does not defeat class certification).
- h. Vaquero, et. al. v. Ashley Furniture Industries Inc., 9 Cal.App.5th 98 (2017) (expands the impact of *Bluford v. Safeway Stores, Inc.* 216 Cal.App. 4th 864 (2013) to commission employees for the first time and held that they must be separately compensated for rest breaks).

8. Declarant is a very experienced class action counsel, including specializing in the area of wage and hour issues. Some of the class action and wage and hour litigation on which The Law Offices of Kevin T. Barnes has served as Lead and/or Class Counsel are as follows: Cruz v. Suntory Water Group, Inc., Case No. BC243596; Joel v. Athlete's Foot Group, Inc., Case No. BC 234231; Cardilino v. Perrier, Case No. BC 210181 and Holt v. Great Springs Water, OC Superior Court Case No. 810642 ("Arrowhead"); Hines v. CSK Auto; Tett v. CSK Auto and Noel v. CSK Auto, Case No. San Diego Superior Court, Case No. 720346 ("Kragen Auto"); Soto et. al. v. Park

1 Uniform Rental Service, et. al., Case No. BC215318; Amezcua, et. al. v. Trak Auto Corporation,
2 Case No. BC 183900 coordinated with Tett v. Trak Auto Corporation, Case No. BC 186931 matter
3 (“Trak Auto”); Maldonado v. Footstar Center, Inc., Case No. 00CC06359; Calvo, et. al. v.
4 McKesson HBOC, Inc., et. al., Case No. BC 228366 coordinated with Ware, et. al. v. McKesson
5 Water Products Company, Case No. BC 231420 “(Sparkletts”); Franco v. Vans Inc., Case No.
6 01CC03995; Cruz v. Suntory Water Group, Inc., Case No. BC243596; Toney v. McDonald’s
7 Restaurant, et al., Case No. BC234243; Tong v. 21st Century Insurance Company, Case No.
8 01CC10913 coordinated with Echegaray v. 21st Century Insurance Co., Case No. BC255189 and
9 Requirme v. 21st Century Insurance Co., Case No. BC253952 (“21st Century”); Wood v.
10 Hollywood Entertainment, Case No. CV779511 coordinated with Dannelley v. Hollywood
11 Entertainment, Inc., Case No. OC 816155 and Peterson v. Hollywood Entertainment Corp., Case
12 No. CV788126 (“Hollywood”); and Lynn Lazdowski, et al. v. Bowne of Los Angeles, Inc., Case
13 No. 02CC16722.

14 9. I have been involved in all of the settlement discussions leading to the present
15 settlement as embodied in the PAGA Settlement Agreement and Release (“Settlement Agreement”).

16 10. Class Counsel are experienced and qualified to evaluate the Class claims and
17 viability of the defenses. The recovery for each Class Member in the present is fair and reasonable
18 based on all risk factors.

19 11. My law office has a total of 137.2 attorney hours including the additional 10 hours
20 that I expect to spend to finalize this declaration and prepare for and attend the PAGA approval
21 hearing, and ensure proper settlement administration and distribution occurs to all Aggrieved
22 Employees. My standard hourly rate for Class Action and PAGA litigation is \$795 per hour. I am
23 the Managing partner in my law firm and have extensive experience handling Class Action and
24 PAGA litigation as set forth in this declaration. My law partner, Gregg Lander, regularly bills at
25 \$695 per hour. Gregg Lander has twenty years’ experience in wage and hour class action and
26 PAGA litigation and is well versed in all aspects of this litigation. Mr. Lander graduated from
27 Texas A&M University in 1989 with a Bachelor of Business Administration degree in Marketing.
28 He graduated from California Western School of Law in San Diego and was admitted to the
California Bar in 1997. He joined The Law Offices of Kevin T. Barnes in 2001 and became a
partner in 2004. Mr. Lander was recognized as a Southern California Super Lawyer in 2004 and the

1 years 2019, 2020, 2021 and 2022, and was a speaker at the Bridgeport December 2008 Wage &
2 Hour Litigation Conference. In 2015, Mr. Lander received an AV Preeminent Rating as part of
3 Martindale-Hubbell's Peer Review Rating process. He is admitted to practice before the following
4 Courts: all California State Courts, all Texas State Courts, United States District Court for the
5 following California Districts: Northern, Central, Eastern and Southern, United States Court of
6 Appeal for the Ninth Circuit, United States Court of Appeals for Veteran's Claims, United States
7 Court of Appeals for the Armed Forces, United States Court of Appeals for the Federal Circuit,
8 United States Tax Court, United States Court of International Trade, United States Court of Federal
9 Claims and United States Supreme Court. **My firms' lodestar will be approximately \$105,174**
10 (see Itemization of Hours of the Law Office of Kevin T. Barnes as **Exhibit 1**). I believe the
11 requested attorneys' fees award for the work of all Plaintiffs' counsel is fair and reasonable. All
12 these hours were reasonable and necessary and related to this litigation.

13 12. The Law Offices of Kevin T. Barnes has total costs in the amount of \$13,121.98.
14 These are costs related to the subject case for filing and service fees, expert and mediator fees and
15 copying for the prosecution of this case. Attached as **Exhibit 2** is an itemized cost sheet for my firm.

16 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
17 and correct.
18

19 Executed this 20th day of October, 2021, at Los Angeles, California.

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21 KEVIN T. BARNES

22 Declarant
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EXHIBIT 1

SPRING COMMUNICATIONS

KTb TIMESHEET

<u>Date</u> <u>KB</u>	<u>Subject Matter</u>	<u>Time</u>	<u>Atty</u>
1/22/19	review new case facts/docs, emails	3.3	KB
1/24/19	emails re new case	0.3	KB
1/28/19	emails	0.2	KB
2/4/19	review docs, emails re claims, tel with RK	1.3	KB
2/12/19	meeting with new plaintiff/RK, emails	3.1	KB
2/13/19	emails	0.2	KB
2/18/19	review P's docs, meeting with new plaintiff	4.9	KB
3/5/19	prepare new case Data sheet, review/organize docs	5.3	KB
3/6/19	revise Data sheet, emails	1.3	KB
3/12/19	meeting with GL/Lenny re case, emails	0.5	KB
3/26/19	emails re claims/LWDA letter, meeting with Lenny	0.6	KB
5/15/19	tel with class rep re status, emails re complaint	0.4	KB
5/23/19	emails re filing	0.3	KB
7/22/19	emails with D atty, meeting with Lenny re issues	0.9	KB
8/19/19	emails re dismissal of D/decl	0.6	KB
9/10/19	emails/meeting with Lenny re other D	0.5	KB
12/2/19	Review and revise supplemental briefing re OSC	2.7	KB
5/22/20	emails re mediation	0.9	KB
5/27/20	emails re mediators	0.6	KB
5/28/20	review order, emails	0.3	KB
5/29/20	emails re mediators	0.8	KB
6/8/20	emails re mediators	0.4	KB
6/22/20	emails/tel with Lenny re mediators	0.5	KB
6/23/20	emails re mediaton	0.3	KB
	emails re mediaton dates, review/revise mediaton data		
6/24/20	demand	2.3	KB
7/24/20	emails re mediation	0.3	KB
9/1/20	tel w/ Lenny re call with new D atty, emails re other case	0.8	KB
10/15/20	emails	0.2	KB
	emails re new filing/mediation/Mara analysis, tel with		
10/19/20	Lenny re issues	1.9	KB
10/20/20	review new LWDA leter, emails re it	0.5	KB
	review mediation emails, tel with Lenny re		
10/22/20	mediation/issues	0.9	KB
11/2/20	emails re mediation	0.3	KB
11/3/20	emails re mediation	0.4	KB
	tel with Dave Mara re mediation and other complaints, tel		
11/4/20	with Lenny re mediation, other cases/issues, emails	1.2	KB
1/28/21	emails re mediation	0.5	KB
2/8/21	emails re mediation data	0.3	KB
2/10/21	emails re data	0.4	KB
2/11/21	emails re medation data/brief	0.5	KB
2/17/21	emails re mediation	0.4	KB
3/5/21	emails re call with new case atty	0.2	KB
3/8/21	tel with Lenny and other P attorney re new filing, emails	0.4	KB
	tel with Lenny re cases/mediation data, review all emails,		
3/15/21	tel with Mara re cases, memo to file	2.2	KB

SPRING COMMUNICATIONS

KTb TIMESHEET

	tel with Mara re cases, meeting with Lenny re cases/fee		
3/15/21	splits, emails	1.4	KB
3/16/21	emails re call, emails/tel with Lenny re memo to expert	1.6	KB
3/16/21	tel with PI, emails	0.5	KB
3/17/21	emails re issues/cases	1.1	KB
	prep/tel with all P counsel re fee split, emails re fee split,		
3/18/21	tel with LS re case/P, emails	1.6	KB
	meeting with Lenny re class rep, emails re location, set		
3/25/21	up appt	1.8	KB
3/26/21	prepare power of atty, emails	0.9	KB
3/29/21	emails/ calls re P visit, tel with Lenny, prep	1.9	KB
3/29/21	travel/meet P, emails, tel with friend	4.8	KB
3/29/21	revise mediation brief, emails	1.2	KB
3/30/21	emails, travel to P visit, memos	4.9	KB
	redline mediation brief, tel with Lenny, review updated		
3/30/21	expert damage calc's	4.1	KB
4/6/21	emails with expert, meetings with Lenny, emails	0.9	KB
4/8/21	prepare for mediation, emails	2.1	KB
4/9/21	prep/attend Zoom mediation, tel/s with Lenny	10.2	KB
4/10/21	emails re settlement	0.4	KB
4/20/21	emails re osc	0.5	KB
4/22/21	emails re MOU	0.2	KB
4/26/21	emails	0.1	KB
4/27/21	emails re MOU	0.2	KB
	review D's redlines to MOU, emails with all P counsel re		
4/27/21	issues	0.8	KB
4/28/21	emails re MOU issues/call	0.6	KB
4/29/21	emails re call, tel with Lenny re issues	0.4	KB
5/25/21	emails re MOU/signatures	0.5	KB
7/26/21	emails	0.6	KB
8/3/21	tel with class rep, emails with Lenny, emails re motion	0.7	KB
9/15/21	<u>emails</u>	<u>0.3</u>	<u>KB</u>
KB TOTAL =		88.2	\$70,119.00

GL

3/6/19	Email from KB re datasheet	0.1	GL
3/11/19	Emails f/t LS re removal + research	0.4	GL
3/12/19	Email from LS re fee split	0.1	GL
3/12/19	Emails t/f LS re Datasheet + review/revise	0.8	GL
3/12/19	Open file/review docs/Email CC	1.4	GL
3/19/19	Meeting w/ KB re direction	0.2	GL
3/24/19	Email from LS re datasheet	0.1	GL
3/25/19	Email to LS re Datasheet + revise	0.2	GL
3/26/19	Emails from LS/KB re RPP	0.1	GL
5/15/19	Email from LS re complaint	0.1	GL
5/15/19	Mtg w/ LS re complaint	0.1	GL
5/17/19	Email LS re Complaint + revise	0.6	GL
5/18/19	Email from LS re complaint	0.1	GL
5/20/19	Emails t/f LS re complaint + revise	0.3	GL
5/21/19	Email from KB re complaint	0.1	GL
5/22/19	Emails f/t CD/LS re service on ind def	0.1	GL
5/23/19	Email from CD re CMC	0.1	GL
5/23/19	Emails f/ CD/LS re complaint filing	0.1	GL

SPRING COMMUNICATIONS

KTb TIMESHEET

5/30/19	Emails f/ CD/LS re Ind Def + mtg	0.2	GL
5/31/19	Email f/t LS/EB re Defendant address	0.2	GL
5/31/19	Email to LS re Simon Yang	0.1	GL
6/3/19	Email f/t EB/LS re new Def address	0.2	GL
6/4/19	Email from CD re CMO + review	0.3	GL
6/19/19	Email from/to LS re OPC call + research	0.4	GL
6/20/19	Email CD re service + research	0.2	GL
6/24/19	Email from CD re service	0.1	GL
6/24/19	Email from LS re Jnt Stmt + mtg w/ LC	0.2	GL
6/25/19	Email from CD re D's Answer + review	0.2	GL
6/26/19	Email from LS re M&C	0.1	GL
6/27/19	Email from OPC re M&C	0.1	GL
6/28/19	Email from LS re M&C	0.1	GL
7/1/19	Emails from LS/CC re POS/mg	0.1	GL
7/2/19	Emails from OPC/LS re mtg	0.1	GL
7/3/19	Email from OPC re conf	0.1	GL
7/8/19	Emails from LS re OPC call	0.2	GL
7/10/19	Email from LS re Stip re amended complaint	0.1	GL
7/15/19	Email from/to LS re J assignment + research	0.4	GL
7/15/19	Emails from LS/OPC re joint statement	0.2	GL
7/16/19	Email from LS re Jnt Stmt	0.1	GL
7/17/19	Email from CD re service + mtg w/ LS/CD	0.2	GL
7/17/19	Emails from LS/OPC re Jnt Stmt	0.2	GL
7/22/19	Email from KB re Spring OPC	0.2	GL
7/24/19	Emails from LS re M&C & issues	0.1	GL
7/26/19	Email to LS re CMC	0.1	GL
7/27/19	Email from LS re CMC	0.1	GL
7/29/19	Email LS re CMC	0.1	GL
7/29/19	Emails from LS re M&C/removal	0.1	GL
8/12/19	Emails from LS/VR/KB re arb agt	0.1	GL
8/13/19	Emails f/t LS/VR re Mejia case + review	0.3	GL
8/19/19	Emails from LS/KB re Gamestop dismissal	0.2	GL
9/10/19	Email from LS re Def resps to complaint	0.1	GL
9/16/19	Email from LS re Answer	0.1	GL
9/18/19	Emails f/t OPC/LS re Def Haber	0.1	GL
9/19/19	Email from CD re Answer	0.1	GL
10/2/19	Email from LS re conf	0.1	GL
10/2/19	Email from OPC re D C Y-C's Answer + review	0.2	GL
10/2/19	Emails from LS/OPC re CMC	0.1	GL
10/4/19	Email from OPC re conf	0.1	GL
10/4/19	Emails from CD/LS re Minute Order re CMC	0.1	GL
10/9/19	Email from CD re D's CMC Stmt + review	0.2	GL
10/10/19	Emails f/ CC/OPC re Ind D	0.1	GL
10/16/19	Email from LS re Ind Def	0.1	GL
10/24/19	Email from LS re Joint Statement	0.1	GL
10/31/19	Emails from LS/OPC re joint statement	0.1	GL
11/1/19	Emails from LS/CC re Joint Statement	0.1	GL
11/7/19	Email from LS re CMC	0.1	GL
11/8/19	Email f/t LS re new J	0.2	GL
11/8/19	Email from LS re CMC	0.2	GL
12/1/19	Emails from LS/to VR re discovery stay	0.1	GL
12/2/19	Emails f/t LS/VR re CMC brief + review/revise	0.4	GL

SPRING COMMUNICATIONS

KTB TIMESHEET

12/2/19	Emails f/t VR/LS re brief re discovery	0.2	GL
12/10/19	Email from LS re CMC	0.1	GL
12/12/19	Email from LS re OSC	0.1	GL
12/17/19	Emails from/to LS re decl + review	0.2	GL
3/5/20	Email from LS re numerosity	0.1	GL
3/5/20	Emails from LS/KB re CMC	0.1	GL
3/15/20	Email from LS re Complaint/Discovery	0.1	GL
3/16/20	Email from LS re FAC	0.1	GL
3/16/20	Review FAC/Disc1 + emails t/f LS/CD	0.4	GL
3/17/20	Email from CD re FAC	0.1	GL
3/17/20	Email from LS re discovery	0.1	GL
3/18/20	Email f/t LS re Disc1 + review	0.2	GL
4/20/20	Emails f/t LS/OPC re disc resps	0.2	GL
4/20/20	Emails t/f LS re complaint response	0.1	GL
4/25/20	Email from LS re Answer	0.1	GL
4/27/20	Email from LS re Answer	0.1	GL
5/12/20	Email from LS re CMC Stmtnt + review	0.2	GL
5/13/20	Emails from OPC/CC/LS re CMC Stmtnt + review	0.2	GL
5/19/20	Emails from LS/OPC re CMC	0.1	GL
5/22/20	Email from LS re mediators	0.1	GL
5/22/20	Emails from OPC/LS re conf/disc/etc.	0.2	GL
5/23/20	Emails from LS/KB re mediators	0.1	GL
5/27/20	Emails from LS/OPC re mediators	0.2	GL
5/28/20	Emails from CD/LS re continuance	0.1	GL
5/29/20	Emails from LS/OPC re mediators	0.2	GL
5/29/20	Emails from/to LS re mediation w/ Mark Rudy	0.1	GL
6/3/20	Email from LS re mediators	0.1	GL
6/8/20	Emails from LS/KB re mediators + research	0.3	GL
6/9/20	Emails from LS/OPC re disc/mediator MR	0.1	GL
6/11/20	Email LS re mediators	0.1	GL
6/22/20	Emails from OPC/LS/KB re mediators + research	0.3	GL
6/26/20	Email from LS re mediation dates	0.1	GL
6/29/20	Emails from LS/KB re Paga rep/mediation	0.1	GL
7/1/20	Email from LS re mediation data needed	0.2	GL
7/1/20	Emails from LS/OPC/KB re mediation date	0.1	GL
7/7/20	Email from LS re mediation data request	0.1	GL
7/14/20	Emails from LS/OPC re mediation docs	0.1	GL
7/24/20	Emails from LS/OPC re mediation docs	0.1	GL
8/13/20	Email from LS re continued Status Conf	0.1	GL
8/19/20	Email from JAMS re mediation	0.1	GL
8/26/20	Emails from LS/KB re mediation	0.1	GL
8/27/20	Email from Med re cancellation	0.1	GL
8/27/20	Email from Med re cancelled med	0.1	GL
9/8/20	Emails from CD/LS re new counsel + research	0.3	GL
9/10/20	Emails f/t KB/LS re mediator	0.1	GL
10/2/20	Email from LS re new Maciel case	0.2	GL
10/5/20	Emails from LS/DM re related Mara case	0.3	GL
10/5/20	Emails from LS/OPC re mediation	0.1	GL
10/6/20	Emails from KB/CC re conf	0.1	GL
10/7/20	Email from CC re conf	0.1	GL
10/8/20	Emails from LS/KB/CC re conf	0.1	GL
10/9/20	Email from JAMS re mediation	0.1	GL

SPRING COMMUNICATIONS

KTB TIMESHEET

10/9/20	Emails from CC/KB/LS re related cases	0.2	GL
10/9/20	Emails from/to LS re successor liability + research	0.4	GL
10/13/20	Email from KB re related cases	0.1	GL
10/15/20	Email from LS re mediation	0.1	GL
10/15/20	Emails from LS/DM re fee split	0.2	GL
10/19/20	Emails from LS/OPC re mediators new case + research	0.4	GL
10/20/20	Emails from KB/LS re mediation/4th case	0.1	GL
10/22/20	Emails from LS/OPC re mediators	0.1	GL
10/23/20	Emails from OPC/LS re mediation	0.1	GL
10/27/20	Email from LS re mediation	0.1	GL
10/28/20	Emails from LS/OPC re mediation date	0.1	GL
11/2/20	Email from CD re Default	0.1	GL
11/2/20	Emails from KB/LS/Med re mediation	0.1	GL
11/3/20	Emails from OPC/LS re mediation	0.1	GL
11/4/20	Email from CG re dismissal of D	0.1	GL
11/5/20	Email from LS re dismissal	0.1	GL
11/10/20	Emails from LS/OPC re mediation data, etc.	0.1	GL
11/14/20	Email from LS re Joint Statement	0.1	GL
11/17/20	Emails from OPC/LS re CMC Stmtnt + review	0.1	GL
11/18/20	Emails from LS/OPC/Crt re joint statement	0.1	GL
1/11/21	Emails from LS/OPC re mediation data	0.1	GL
1/26/21	Emails from LS/OPC re mediation data	0.1	GL
2/1/21	Emails from CC/OPC re mediation data	0.1	GL
2/3/21	Email from LS re Med data production	0.1	GL
2/5/21	Email from OPC re mediation docs	0.1	GL
2/8/21	Email from LS re mediation data	0.1	GL
2/11/21	Email from CC re progress	0.1	GL
2/17/21	Emails from CC/LS / to JL re OPC info	0.1	GL
2/17/21	Emails from LS/RK re P info	0.1	GL
2/18/21	Emails from LS/CC re mediation data	0.1	GL
2/19/21	Email from Med re new date	0.1	GL
2/20/21	Emails from CC/LS re mediation date	0.1	GL
2/22/21	Emails from CC/LS/KB re mediation date	0.1	GL
2/25/21	Email from KB re mediation	0.1	GL
2/25/21	Emails from LS re P info	0.1	GL
2/26/21	Email from SY re new case	0.1	GL
2/27/21	Emails from LS/KB re new firm	0.1	GL
3/1/21	Emails from LS/RK re P	0.1	GL
3/2/21	Email from CG re FAC	0.1	GL
3/2/21	Email from KB re P	0.1	GL
3/2/21	Emails from LL/LS re Messrelian case	0.1	GL
3/2/21	Emails from LS re P	0.2	GL
3/4/21	Emails from CC/LS re mediation data	0.1	GL
3/5/21	Email from LS re employee list	0.1	GL
3/12/21	Email from CC re cm #	0.1	GL
3/13/21	Emails from CC/LS re sample	0.1	GL
3/15/21	Email from LL re sample	0.1	GL
3/16/21	Email f/ CC re doc production + review	0.4	GL
3/16/21	Email from CC re payroll data	0.1	GL
3/16/21	Email from LS re expert email	0.3	GL
3/17/21	Emails from KB/CC/LS re damage analysis	0.2	GL
3/17/21	Emails from LS/KB/CC re expert review	0.2	GL

SPRING COMMUNICATIONS

KTB TIMESHEET

3/18/21	Email from KB re fee split	0.2	GL
3/18/21	Email from OPC re wage statements	0.1	GL
3/18/21	Email to KB re P + research issues	0.3	GL
3/18/21	Emails f/ KB/RK re plaintiff	0.1	GL
3/19/21	Emails f/ KB/RK re plaintiff	0.2	GL
3/23/21	Email from Crt re Status Conf Report + review	0.2	GL
3/23/21	Emails from LS/OPC re Status Conf	0.1	GL
3/25/21	Emails from KB/JL re data	0.1	GL
3/25/21	Emails from LS/Med re mediation brief	0.1	GL
3/29/21	Email from LS re Status Conf	0.1	GL
3/30/21	Email from KB re P	0.1	GL
3/30/21	Emails from LS/OPC re CMC	0.1	GL
4/1/21	Email from LS re P's mediation brief + review	0.3	GL
4/6/21	Emails from CC/LS re mediation start	0.1	GL
4/7/21	Email from Med re link	0.1	GL
4/9/21	Email from KB re settlement agt + review	0.2	GL
4/15/21	Emails from/to LS/CC re MOU + review	0.3	GL
4/20/21	Emails from LS/CC re CMC	0.2	GL
4/23/21	Emails from CC/LS re CMC	0.1	GL
4/26/21	Email from CC re SAC + review	0.2	GL
4/27/21	Email from LS re SAC revisions	0.2	GL
5/3/21	Email from CG re Strmnt	0.1	GL
5/10/21	Email from LS re CMC	0.1	GL
5/10/21	Emails from DM/DY/LS re settlement	0.1	GL
5/28/21	Email from LS re settlement agt + review	0.3	GL
6/2/21	Emails from LS/CC re settlement agt	0.1	GL
6/4/21	Emails from LS/CC re Fee Agt + review	0.2	GL
6/9/21	Emails from LS/CC re settlement agt	0.1	GL
6/18/21	Emails from/to LS re SAC + revise	0.3	GL
6/19/21	Emails from LS/CC re amended complaint	0.2	GL
6/22/21	Emails from LS/CC re settlement agt	0.1	GL
6/28/21	Email from LS re PAD	0.1	GL
7/2/21	Email from CC re settlement agt + review	0.2	GL
7/2/21	Emails from CD/LS re TSC	0.1	GL
7/6/21	Email from OPC re MOU	0.1	GL
7/7/21	Email f/t LS re TSC	0.1	GL
7/7/21	Emails from LS/CC re MOU revisions	0.2	GL
7/8/21	Email from LS re P info	0.1	GL
7/8/21	Emails from LS/DM/KB re pdf	0.1	GL
7/14/21	Emails from LS/CC re TPA/settlement agt	0.1	GL
7/15/21	Emails from LS re sigs	0.1	GL
7/20/21	Email from CC re revisions	0.1	GL
7/20/21	Emails from CC/LS re dismissals	0.1	GL
7/21/21	Email from CC re amended complaint	0.1	GL
7/21/21	Emails from LS/CC re settlement agt	0.3	GL
7/26/21	Emails from LS/CC re sigs/dismissals/amended comp	0.2	GL
7/27/21	Emails from CC/LS re settlement agt sigs	0.1	GL
8/3/21	Emails from LS/OPC/CC re status/agts	0.3	GL
8/9/21	Email from CC re s. agt	0.1	GL
8/9/21	Email from CC re Stip	0.1	GL
8/11/21	Email from CC/RK re settlement agt	0.1	GL
8/24/21	Email from CC re SACC + review	0.2	GL

SPRING COMMUNICATIONS

KTB TIMESHEET

8/24/21	Emails from CC re SAC	0.1	GL
8/30/21	Email from CC re CMC	0.1	GL
9/15/21	Emails from LS/CC re status	0.1	GL
9/16/21	Email from CC re PAH date	0.1	GL
9/17/21	Email to LS re P call + P call	0.2	GL
9/21/21	Email from/to LS re P call	0.1	GL
9/29/21	Email from CC re mtg + review	0.3	GL
9/30/21	Emails from LS/CC re settlement docs	0.1	GL
10/8/21	Emails from CC re Approval motion	0.1	GL
10/11/21	Email from LS/OPC re dismissal	0.1	GL
10/12/21	Emails from CC re motion for approval + review	0.3	GL
10/12/21	Emails from/to CD/LS re Status Conf/OSC	0.2	GL
10/13/21	Email from KB re KB decl	0.1	GL
10/14/21	Email from CC re CMC Report + review	0.2	GL
10/14/21	Emails from CC/OPC/LS re CMC/Stmnt/dismissal	0.2	GL
10/15/21	Email from CC re P decl + review	0.2	GL
10/15/21	Emails f/t CD re KB Decl + review/revise	0.3	GL
10/15/21	Emails from Crt/CG re LS decl + review	0.2	GL
10/18/21	Email from CC re P decl + review	0.1	GL
10/18/21	Email from KB re costs/hours	0.1	GL
10/18/21	Email from LS re cy pres	0.1	GL
10/18/21	Email from OPC re Def decl + review	0.2	GL
10/18/21	<u>Emails from/to SP/KB re lodestar + calc</u>	<u>0.3</u>	<u>GL</u>
GL TOTAL =		39.0	\$27,105.00
KTB TOTAL =		127.2	\$97,224.0

EXHIBIT 2

Disbursement Detail

Printed: 10/19/2021

Firm Firm not entered
CaseID 19.006
Style Palacios, Rene vs. SPRING COMMUNICATIONS, INC.

COURT COSTS

<u>Payee/Description</u>	<u>Description</u>	<u>Check No.</u>	<u>Check Date</u>	<u>Amount</u>
Courtcall	Courtcall	10569053	05/20/2020	54.00
				54.00

FILING FEES

<u>Payee/Description</u>	<u>Description</u>	<u>Check No.</u>	<u>Check Date</u>	<u>Amount</u>
LWDA	Filing	20190312	03/12/2019	75.00
Janney & Janney	Filing	2721709	05/22/2019	1,510.00
Riverside County Court	Jury Fees	20190603	06/03/2019	150.00
Janney & Janney	Filing	2750055-01	06/04/2019	180.00
Janney & Janney	Filing	2750055-02	06/04/2019	15.00
Janney & Janney	Filing	2753985-01	06/06/2019	45.00
Janney & Janney	Filing	2753985-02	06/06/2019	15.00
Janney & Janney	Filing	2854075-01	07/18/2019	45.00
Janney & Janney	Filing	2854075-02	07/18/2019	25.00
Janney & Janney	Filing	2871196-02	07/25/2019	15.00
Janney & Janney	Filing	2871196-01	07/25/2019	30.00
Janney & Janney	Filing	3116449-02	11/04/2019	25.00
Janney & Janney	Filing	3116449-01	11/04/2019	45.00
Janney & Janney	Filing	3116423-02	11/04/2019	25.00
Janney & Janney	Filing	3116430-02	11/04/2019	25.00
Janney & Janney	Filing	3116423-01	11/04/2019	45.00
Janney & Janney	Filing	3116430-01	11/04/2019	45.00
Janney & Janney	Filing	3195467-02	12/06/2019	25.00
Janney & Janney	Filing	3195467-01	12/06/2019	60.00
Janney & Janney	Filing	3480875-01	03/18/2020	65.00
Janney & Janney	Filing	3480875-02	03/18/2020	30.00
Janney & Janney	Filing	3566227-01	06/03/2020	50.00
				2,545.00

SERVICE OF PROCESS

<u>Payee/Description</u>	<u>Description</u>	<u>Check No.</u>	<u>Check Date</u>	<u>Amount</u>
Allstar Atty Service	Serve Summons and Complaint	67984	05/22/2019	200.00
Allstar Atty Service	Serve Summons and Complaint	67985	05/22/2019	200.00
Allstar Atty Service	Serve Summons and Complaint	67986	05/22/2019	200.00
Allstar Atty Service	Serve Summons and Complaint	68208	06/12/2019	183.60
Allstar Atty Service	Serve Summons and Complaint	68515	07/17/2019	200.00
				983.60

ARBITRATION/MEDIATION FEES

<u>Payee/Description</u>	<u>Description</u>	<u>Check No.</u>	<u>Check Date</u>	<u>Amount</u>
FRANK & FEDER MEDIATOR	Mediation	7681	01/25/2021	7,500.00
				7,500.00

EXPERT FEES

<u>Payee/Description</u>	<u>Description</u>	<u>Check No.</u>	<u>Check Date</u>	<u>Amount</u>
Berger Consulting Group	Expert	7757	04/12/2021	1,762.50
				1,762.50

Disbursement Detail

Printed: 10/19/2021

Firm Firm not entered

CaseID 19.006

Style Palacios, Rene vs. SPRING COMMUNICATIONS, INC.

COSTS

<u>Payee/Description</u>	<u>Description</u>	<u>Check No.</u>	<u>Check Date</u>	<u>Amount</u>
Photocopy/Scan	Photocopy/Scan	20190325	03/25/2019	80.00
Postage	Postage	20190731	07/31/2019	36.88
Photocopy/Scan	Photocopy/Scan	20200108	01/08/2020	80.00
Photocopy/Scan	Photocopy/Scan	20210104	01/04/2021	80.00
				276.88
TOTAL:				13,121.98