

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Telephone: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Robert Harlow, Jr.

Ronald H. Bae (SBN 186826)
Olivia D. Scharrer (SBN 291470)
Carson M. Turner (SBN 345992)
AEQUITAS LEGAL GROUP
A Professional Law Corporation
1156 E. Green Street, Suite 200
Pasadena, California 91106
Telephone: (213) 674-6080 / Facsimile: (213) 674-6081

Attorneys for Plaintiff Mary Alfardi

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO**

ROBERT HARLOW, JR., individually, and
on behalf of other members of the general
public similarly situated,

Plaintiff,
vs.

COVENANT AVIATION SECURITY, LLC,
an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

MARY ALFARDI, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,
vs.

COVENANT AVIATION SECURITY, LLC,
an Illinois limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No. 20-CIV-03986

*(Consolidated with Case Nos. 20-CIV-03986
and 23-CIV-05656)*

[Assigned for all purposes to the Honorable
Nancy L. Fineman, Dept. 4]

**DECLARATION OF RONALD H. BAE IN
SUPPORT OF UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT AND
MOTION FOR AWARD OF ATTORNEYS'
FEES AND COSTS**

Date: September 17, 2024

Time: 2:00 p.m.

Dept: 4

[Filed concurrently with Motion for Final
Approval; Motion for Attorneys' Fees;
Declaration of Tara Zabehi; Declaration of
Robert Harlow, Jr.; Declaration of Mary
Alfardi; Proposed Order; and Proposed
Judgment]

[Complaint filed: September 16, 2020]

1 ROBERT HARLOW, JR., individually, and
2 on behalf of other aggrieved employees
3 pursuant to the California Private Attorneys
4 General Act;

5 Plaintiff,
6 vs.

7 COVENANT AVIATION SECURITY, LLC,
8 an unknown business entity; and DOES 1
9 through 100, inclusive,

10 Defendants.
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF RONALD H. BAE

I, Ronald H. Bae, declare as follows:

1. I am an attorney at law duly licensed to practice before this Court. I am a shareholder with the law firm of Aequitas Legal Group, A Professional Law Corporation, co-counsel of record for Plaintiffs ROBERT J. HARLOW, JR. and MARY ALFARDI, the Settlement Class, and the proposed group of aggrieved employees in this action. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath. I make this declaration in support of Plaintiffs' Unopposed Motion for Final Approval of Class Action and PAGA Settlement and Motion for Award of Attorneys' Fees and Costs.

The Parties

2. Defendant COVENANT AVIATION SECURITY, LLC provides airport screening and security services at airports throughout the United States, including various airports in California.

3. Plaintiff MARY ALFARDI ("Plaintiff Alfardi") worked for Defendant as a non-exempt, hourly-paid Security Screener from approximately May 18, 2009 to approximately July 11, 2017. Plaintiff Alfardi worked at the San Francisco International Airport.

Relevant Procedural History

4. On October 5, 2020, Plaintiff Alfardi filed her complaint in San Francisco Superior Court. The complaint alleged the following causes of action: (1) failure to pay regular and overtime wages under Labor Code §§ 510, 1194, and 1198; (2) failure to reimburse necessary work-related expenses under Labor Code §§ 2800 and 2802; and (3) unfair competition in violation of Business & Professions Code § 17200, *et seq.* The complaint alleged that Plaintiff Alfardi and the putative class members were not paid for time spent traveling on shuttles from the airport parking lot to their job sites, and that they were not reimbursed for parking expenses. The putative class was defined as all of Defendant's non-exempt California employees between October 5, 2016 and the date of class certification in this action.

5. On January 21, 2021, Defendant filed an answer to the complaint.

1 6. On June 4, 2021, Defendant filed a motion to compel arbitration. Defendant argued
2 that Plaintiff Alfardi worked under a collective bargaining agreement (“CBA”) that required her to
3 arbitrate her claims, and that her claims were contractual in nature.

4 7. On July 12, 2021, Plaintiff Alfardi filed an opposition to the motion to compel
5 arbitration on the ground that the CBA did not include a clear and unmistakable waiver of Plaintiff
6 Alfardi’s right to a judicial forum for statutory claims. The grievance provision in the CBA only
7 provided for optional arbitration of claims arising under the CBA.

8 8. On July 16, 2021, Defendant filed a reply in support of the motion.

9 9. On July 23, 2021, the motion to compel arbitration was denied. The Court held that
10 the CBA did not contain a clear and unmistakable waiver of the right to assert statutory claims.

11 10. On August 12, 2021, Defendant filed an appeal of the order denying the motion to
12 compel arbitration.

13 11. In November 2021, the parties agreed to attend a private mediation in February 2022
14 and stipulated to extend the deadline for Defendant to file its opening brief.

15 12. On February 22, 2022, the parties participated in a global mediation with Mr. John
16 B. Bates, Jr. The mediation was not successful, but the parties agreed to participate in a second
17 mediation in September 2022. The deadline for Defendant to file its opening brief was extended by
18 stipulation to October 2022.

19 13. On September 14, 2022, the parties participated in a global mediation with Mr. Paul
20 Grossman. The mediation was not successful, but the parties reached a settlement a few weeks later
21 via a mediator’s proposal. Further information about the settlement process is provided below in
22 the section regarding settlement negotiations.

23 14. On October 17, 2022, Defendant’s appeal was dismissed and remittitur was issued.

24 15. As part of the settlement, the parties agreed that the *Alfardi* action would be
25 transferred from San Francisco Superior Court to San Mateo Superior Court and would be
26 consolidated with the *Harlow* class action and PAGA action.

27 16. On November 29, 2023, the transfer of the *Alfardi* action was completed.

28 17. On December 12, 2023, the *Alfardi* action was consolidated with the *Harlow* class

1 action and the *Harlow* PAGA action, with the *Harlow* class action as the lead case.

2 **Investigation and Discovery**

3 18. Over the course of the last three years, Plaintiff Alfardi's counsel expended
4 significant time and resources conducting investigation and discovery, as follows:

5 **Pre-Filing Investigation**

6 19. Before filing the complaint, Plaintiff Alfardi requested and obtained from Defendant
7 her payroll records, personnel file, and documents that she signed during her employment with
8 Defendant. Plaintiff Alfardi's counsel reviewed and analyzed these records before filing the
9 complaint.

10 20. Plaintiff Alfardi also made a Public Records Act request to the California Division
11 of Labor Standards Enforcement for documents related to wage-and-hour claims against Defendant.
12 In September 2020, Plaintiff Alfardi received documents responsive to this request.

13 **Written Discovery and Depositions**

14 21. On January 25, 2021, Plaintiff Alfardi propounded two sets of Form Interrogatories,
15 one set of Special Interrogatories, and three sets of Requests for Production of Documents on
16 Defendant. These requests sought the putative class members' names and contact information;
17 Plaintiff Alfardi's time records, payroll records, and other employment records; relevant policy
18 documents; the putative class members' time and payroll records; and other documents and
19 information needed to prepare for class certification.

20 22. On February 26, 2021, Defendant responded to these requests with objections only.
21 The primary objection was that Plaintiff Alfardi was required to arbitrate her claims.

22 23. On March 1, 2021, Defendant produced the CBA under which Plaintiff Alfardi
23 worked.

24 24. Over the next several months, Plaintiff Alfardi met and conferred with Defendant
25 extensively about Defendant's failure to provide substantive responses. The parties agreed to
26 extend Plaintiff Alfardi's motion to compel deadline until after the arbitration issue was resolved.

27 25. In November 2021, the parties agreed to conduct informal discovery in preparation
28 for the first mediation.

26. In February 2022, Defendant produced CBAs that applied to the putative class members; several versions of the employee handbook; job descriptions for the putative class members; time and payroll data for approximately 10% of the putative class members; and spreadsheets with the job titles, dates of employment, and regular rate of pay for 2,528 putative class members. These informal disclosures contained approximately 28,000 pages of documents and over 420,000 lines of data.

27. In August and September 2022, Defendant provided additional informal discovery for the second mediation. Defendant produced approximately 2,400 pages of payroll records; approximately 45,000 lines of time data; and updated information regarding the workweeks, PAGA pay periods, and the average regular rate.

28. In total, Defendant produced over 30,000 pages of policy documents and payroll records, and over 450,000 lines of time data. The payroll records and time data covered approximately 15% of the putative class members for the time period from October 2016 to June 2022.

29. Plaintiffs' counsel thoroughly analyzed all of the available information and documents to evaluate the strength of each claim and prepare a class-wide damages analysis.

Settlement Negotiations

30. All of Class Counsel's pre-filing investigation, discovery during litigation and pre-mediation efforts resulted in the ability to estimate Defendant's exposure, as well as the success probabilities applicable to certification and liability for each alleged cause of action. Plaintiffs were thus able to enter settlement negotiations armed with the information required to settle this matter for a fair and reasonable amount, having thoroughly assessed the risks and prepared an estimated class-wide damages model.

31. On February 22, 2022, the parties participated in a private mediation with Mr. John B. Bates, Jr., a well-respected mediator who is very knowledgeable and experienced in wage and hour class actions. This mediation was not successful, but the parties agreed to continue settlement discussions and scheduled a second mediation.

32. On September 14, 2022, the parties participated in a full-day mediation with Mr.

1 Paul Grossman, who is also a well-regarded mediator with extensive wage-and-hour experience.
2 The parties negotiated vigorously all day, but were unable to reach a settlement. However, the
3 parties continued their settlement discussions with Mr. Grossman's assistance.

4 33. On September 26, 2022, the parties reached the instant settlement as a result of Mr.
5 Grossman's mediator's proposal.

6 34. Between October 2022 and August 2023, the parties negotiated the terms of the
7 Memorandum of Understanding, the Class Action and PAGA Settlement Agreement ("Settlement
8 Agreement") and the notice packet. The Settlement Agreement was fully executed on August 25,
9 2023.

10 35. It took a long time to reach an agreement because of vigorous negotiations as to the
11 terms of the settlement and the language to be used in the notice packet. Nevertheless, the parties
12 worked together as best they could to finalize the settlement terms, which are memorialized in the
13 Settlement Agreement, and the language of the Class Notice. A true and correct copy of the fully
14 executed Settlement Agreement is attached to the April 3, 2024 preliminary approval order as
15 **Exhibit 1**. The Notice of Class Action Settlement is attached to the Settlement Agreement as
16 **Exhibit A**. A true and correct copy of the February 9, 2024 Joint Stipulation to Amend and Modify
17 Class Action and PAGA Settlement Agreement is attached to the April 3, 2024 preliminary
18 approval order as **Exhibit 2**.

19 36. The negotiations were conducted at more than arm's-length and the resulting
20 settlement was the outcome of an informed and educated analysis regarding certification and
21 liability issues and the total exposure in relation to the costs and risks attendant to Plaintiffs and the
22 Class.

23 37. This settlement was accomplished after discovery and investigation, with Plaintiffs
24 having invested in extensive factual and legal research, engaged in numerous discussions and
25 exchanges of correspondence, reviewed and analyzed time and payroll records and data, policy
26 documents, and other relevant documents, and conducted extensive negotiations at the mediations
27 and thereafter. It was only after the parties thoroughly assessed the risks presented by the facts of
28 the case and the current status of the applicable law, that they entered into a well-reasoned

1 settlement.

2 38. In addition, there were risks, uncertainty, and developments regarding a number of
3 factors in the case which gave the parties the perspective and the incentive to thoroughly assess the
4 risks of the case. These risks included the following: (1) The class members are union members
5 and the court may find that CBAs meet the requirements for the overtime exemption in Labor Code
6 § 514, so any unpaid wages could only be recovered at the regular rate; (2) Plaintiffs would have
7 had to overcome Defendant's argument that the shuttle time was not compensable and parking
8 expenses were not necessary because employees were not required to drive to work and could use
9 public transportation, get a ride, or ride a bike; (3) Defendant's written policies prohibit working off
10 the clock and do not require employees to park in any particular place; and (4) the class members
11 were exempt from meal break requirements pursuant to Labor Code § 512(e)-(f). Further, if the
12 case had not settled, Defendant would have continued with its appeal of the order denying the
13 motion to compel arbitration. Plaintiffs were confident that the order would be affirmed, but it
14 would have taken another year or more to litigate the appeal to conclusion. Additionally, there was
15 a risk that the risk that some employees would be excluded from the class and/or the group of
16 aggrieved employees because they worked under newer CBAs that included what may be deemed a
17 clear and unmistakable waiver of the right to bring statutory claims in court. These risks are in
18 addition to the ordinary risks that Plaintiffs would be unable to prevail on one or more claims at
19 class certification and trial. Plaintiffs believed that they would prevail at class certification, but this
20 was not guaranteed, and it was possible that Plaintiffs would have to face a motion for
21 decertification or a dispositive motion. Even if this case was certified, a total victory for the Class
22 was far from guaranteed, and achieving it at class certification and trial and surviving any post-trial
23 motions or appeals would have come at great litigation costs and expenses to the Class. These
24 factors also support a finding that the settlement is fair and reasonable.

25 **Plaintiff's Counsel's Experience and Qualifications**

26 39. I am the principal attorney at Aequitas Legal Group and am co-counsel for Plaintiffs
27 in this matter. I graduated from UCLA in 1991 with a B.A. in Economics. I obtained a law degree
28 from Southwestern Law School in 1996. I have been practicing for approximately 26 years. While

1 in law school, I served as the Articles Editor of the Southwestern Journal of International Law, as
2 well as served as an extern/law clerk at the U.S. Bankruptcy Court, California Attorney General's
3 Office (Writs, Trials & Appeals) (where I drafted six appellate briefs) and the U.S. Attorney's
4 Office (Tax Division).

5 40. After graduating law school in 1996, I was commissioned as a naval officer to serve
6 as a military lawyer for the U.S. Navy Judge Advocate General's Corps. I was stationed overseas
7 in Yokosuka, Japan for 4 years. During that time I tried numerous court-martial cases, ranging
8 from misdemeanors to major felonies, including second-chairing two capital murder cases, one
9 involving misappropriation of classified material on North Korea. During my tour, I also managed
10 the U.S. Naval Legal Service Office Pacific's claims department whose area of responsibility
11 included mainland Japan, Korea, the Philippines, Hong Kong, Singapore, Diego Garcia, and much
12 of the Indian Ocean to the North Arabian Sea. For my services, I was awarded two Navy
13 Achievement Medals, a Navy Commendation Medal and a Humanitarian Service Medal.

14 41. After my honorable discharge from the Navy, I practiced law at several Los Angeles
15 defense firms specializing in legal malpractice defense, banking, real estate and commercial
16 litigation. I have defended numerous high-exposure legal malpractice cases where the underlying
17 case involved disputes such as complex binding arbitrations over partnership breakdown, Multi-
18 District Litigation in federal court after a Boeing 747 airplane crash in Guam, and a multitude of
19 business and commercial litigation issues. Currently, I devote my practice to litigating class action
20 cases involving wage and hour, consumer fraud and unfair business practices on behalf of
21 employees and consumers. Approximately 95% of our firm's caseload consists of class actions in
22 various stages of litigation, both in state and federal courts. Our firm also accepts some individual
23 wage and hour cases with small amounts in controversy as a form of pro bono, so that we can lend
24 our expertise to someone who would not otherwise be able to retain competent counsel.

25 42. Olivia D. Scharrer is an associate attorney at Aequitas Legal Group. She received
26 her Juris Doctorate from Loyola Law School in 2013. During law school, she served as a
27 Production Editor of the Loyola of Los Angeles International and Comparative Law Review. She
28 also served as a judicial extern to the Honorable Teresa Sanchez-Gordon, Judge of the Los Angeles

1 Superior Court. She earned a Bachelor of Arts, *magna cum laude*, from Oklahoma State University
2 in 2009.

3 43. A few examples of class certification victories obtained by the attorneys of Aequitas
4 Legal Group (via contested motion) in wage and hour class actions are as follows:

- 5 a. In *Preciado v. Adriana's Insurance Services* (L.A.S.C. BC 400171), our
6 motion for class certification for numerous Labor Code violations was
7 granted on behalf of customer service representatives and sales agents;
- 8 b. In *Hernandez v. Brand Connections, Inc.* (L.A.S.C. BC 401775), our motion
9 for class certification for Labor Code violations (i.e., minimum
10 wage/overtime, meal/rest period claims, along with derivative claims) was
11 granted in its entirety;
- 12 c. In *Delgado v. C. A. Hofmann Construction, Inc.* (CIVRS 1105913), a
13 proposed class of construction workers was certified in its entirety for
14 numerous wage and hour claims;
- 15 d. In *Garcia v. Menzies Aviation* (L.A.S.C. BC 452057), a proposed class of
16 airport ramp agents was certified for wage and hour claims;
- 17 e. in *Nguyen v. Inter-Coast International Training, Inc.* (L.A.S. C. BC 461585),
18 a class of nonexempt employees was certified against a for-profit college.
- 19 f. On November 20, 2015, another certification victory was achieved on behalf
20 of a class of 13,267 retail store employees in *Scott-George v. PVH Corp.*,
21 (U.S. District Court, E.D. Cal., 2:13-cv-00441-TLN-DAD);
- 22 g. On December 6, 2021, the Los Angeles Superior Court Complex Department
23 certified a class of landscape workers in Park West Wage and Hour Cases
24 (JCCP 4920).

25 44. The attorneys of our firm have been appointed class counsel (and lead class counsel
26 in consolidated matters) of numerous wage and hour class actions litigated in both state and federal
27 courts. Some of the class actions I have handled through final approval are as follows:

- 28 a. *Garcia v. Mellano & Company* (L.A.S.C. BC 396063) (class of warehouse

- 1 and farm workers);
- 2 b. *Bejar v. Roman Catholic Archbishop of Los Angeles* (L.A.S.C. BC 390260)
- 3 (class of employees of Our Lady Queen of Angels church);
- 4 c. *Scott v. Better Beverages, Inc.* (L.A.S.C. BC 403882) (class of delivery
- 5 drivers);
- 6 d. *Gorman v. IDEXX Laboratories, Inc.* (L.A.S.C. BC 413933) (class of route
- 7 drivers);
- 8 e. *Guzman v. Rockey Murata Landscaping, Inc.* (L.A.S.C. BC 421699) (class of
- 9 landscaping workers);
- 10 f. *Hernandez v. Brand Connections, Inc.* (L.A.S.C. BC 401775) (class of
- 11 warehouse workers);
- 12 g. *Preciado v. Adriana's Insurance Services, Inc.* (L.A.S.C. BC 400171) (class
- 13 of customer service representatives and sales agents);
- 14 h. *Tyree v. BJ's Restaurants* (O.C.S.C. Case No. 30-2009-00259460) (class of
- 15 kitchen managers);
- 16 i. *Perez v. Rick's Drive In & Out* (L.A.S.C. BC 426222) (class of restaurant
- 17 workers);
- 18 j. *Holloway v. Authentic Recovery Center* (L.A.S.C. BC 442949) (class of
- 19 substance recovery center workers);
- 20 k. *Silva v. JYM Enterprises* (L.A.S.C. BC 437834) (class of Jack-In-The-Box
- 21 restaurant workers);
- 22 l. *Jimenez v. Printograph, Inc.* (L.A.S.C. BC 440209) (class of printshop
- 23 workers);
- 24 m. *Ramirez v. Advanced Parking Systems* (L.A.S.C. BC 455137) (class of
- 25 parking clerks);
- 26 n. *Zacatenco v. Pinnacle Landscaping Company* (L.A.S.C. BC 466988) (class
- 27 of landscape laborers);
- 28 o. *Allen v. Labor Ready Southwest, Inc.* (C.D. Cal. 09cv04266) (class of

temporary workers);

p. *Arana v. Adriana's Insurance Services, Inc.* (L.A.S.C. BC 453021) (class of managers);

q. *Soltero v. Mariposa Horticultural Enterprises* (L.A.S.C. BC 439687) (class of landscape workers);

r. *Castro v. Marinello School of Beauty* (JCCP Case No. 4704) (class of nonexempt beauty school employees);

s. *Garcia v. Menzies Aviation* (L.A.S.C. BC 452057) (class of nonexempt employees);

t. *Gindi v. Walgreen Co.* (U.S.D.C. Case No. 2:13-cv-01154-PSG-FFM) (class of nonexempt, retail-store employees);

u. *Taylor v. Kwikset Corp.* (O.C.S.C. 30-2011-00438371-CU-OE-CXC) (class of nonexempt employees); *Scott-George v. PVH Corp.* (E.D. Cal., 2:13-cv-00441-TLN-DAD) (class of nonexempt employees);

v. *Marina Landscape Wage & Hour Cases*, JCCP 4867 (class of nonexempt, landscape employees);

w. *Del Toro v. Centene Corp.* (U.S.D.C. N.D. Cal, Case No. 4:19-cv-05163-YGR) (class of non-exempt, call center workers); and many others.

Contingent Nature of the Case

45. Complexity and risk were abundant in this case. When this case was taken on a contingent fee basis, with Plaintiffs' counsel advancing all litigation costs and devoting attorneys' billable hours, the ultimate result was far from certain. Our collective experience in wage and hour class and representative actions was integral in evaluating the strengths and weaknesses of the case against Defendant and the reasonableness of the settlement. Practice in the narrow field of wage and hour litigation requires skill and knowledge concerning the constantly evolving substantive law (state and federal), as well as the procedural law of class and representative action litigation. The issues presented by this case required more than just a general appreciation of wage and hour law and class and representative action procedure, as this area of practice is

1 constantly developing. Much of the law regarding PAGA claims is unsettled and has been
2 developing especially quickly in recent years.

3 46. In order to adequately litigate this matter, our firm was precluded from other
4 employment. We were forced to decline other worthy cases because attorney and staff to case
5 ratios would not allow for any additional matters. Taking on this case meant that our firm had to
6 turn away other fee-generating work because this case required substantial firm resources on
7 multiple fronts: pre-litigation investigation and research; ongoing communications with Plaintiffs;
8 researching the applicable law, particularly laws in flux at the time of settlement; engaging in
9 formal and informal discovery; analyzing documents and data; and conducting legal and factual
10 analyses in preparation for mediation.

11 **Plaintiff Alfardi's Service Award**

12 47. Plaintiff Alfardi has spent considerable time and effort in the prosecution of this
13 action, including participating in numerous telephone conferences and email exchanges with Class
14 Counsel, providing documents to Class Counsel, reviewing documents related to this case,
15 consulting with Class Counsel on an ongoing basis to assist in the preparation of targeted
16 investigation and discovery, identifying potential witnesses, and other related work.

17 48. As a direct result of Plaintiff Alfardi's time and efforts, all of the Class Members
18 now stand to benefit from the Settlement. Class Counsel therefore fully supports the proposed
19 service award of \$12,500 to Plaintiff Alfardi as being preliminarily fair, reasonable, and
20 appropriate. Defendant does not oppose this proposed award.

21 **Requested Attorneys' Fees and Costs**

22 49. Plaintiffs' counsel request attorneys' fees of up to 40% of the total settlement
23 amount (i.e., \$2,000,000 of the Total Settlement Amount of \$5,000,000). The attorneys' fees
24 awarded by the Court will be divided as follows: 50% to Aequitas Legal Group, and 50% to
25 Lawyers for Justice. Plaintiff Alfardi has given written approval to this fee-sharing agreement.
26 Plaintiff Alfardi has agreed that, in a class action settlement, her counsel may apply for an award
27 of fees based upon the time expended, the difficulty of the litigation, and the results achieved,
28 among other things.

50. The table below is a summary showing the experience level of lawyers and their staff involved in the case, their hourly rates, hours spent on this case and the resulting lodestar. The following summary was compiled from our firm's computerized billing software which each attorney and paralegal uses to contemporaneously keep track of their billable hours during litigation. Such time records are prepared and maintained by our firm in the ordinary course of business; a true and correct copy of the summary of our billing record is attached as **Exhibit A**.

Name	Position	Rate	Hours	Lodestar
Ronald H. Bae	Attorney (27th year)	\$1,025/hr.	306.6	\$314,265
Olivia D. Scharrer	Attorney (11th year)	\$700/hr.	202.7	\$141,890
Carson M. Turner	Attorney (2nd year)	\$500/hr.	7.2	\$3,600
TOTAL			516.50	\$459,755

51. The hourly rates for each lawyer used for calculating the lodestar are comparable to those charged by California law firms that specialize in wage and hour class action defense. Attached as **Exhibit B** is a true and correct copy of the relevant pages from Thomson Reuters' Legal Billing Report, Volume 17, Number 3, showing comparable hourly rates for law firms in California and West regions. In addition, the Laffey Matrix for the time period June 2023 to May 2024 provides that an attorney with 20+ years of experience in the Washington DC metropolitan area can reasonably charge \$1,057 per hour. The Los Angeles legal market is a one of the largest legal markets in the United States and is comparable to the Washington DC legal market. The Laffey Matrix can be found at this link (<http://www.laffeymatrix.com/see.html>) and a copy is also attached as part of Exhibit B.

52. The Settlement Agreement provides that Plaintiffs' counsel may request reimbursement of litigation costs of up to \$75,000. Over the course of this litigation, our firm has incurred a total of \$7,639.03 in necessary litigation expenses. A true and correct copy of the detailed expense report is attached as **Exhibit C**.

///

///

///

///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 23, 2024, at Pasadena, California.


RONALD H. BAE

EXHIBIT A

Aequitas Legal Group - Activity Type

Date Start: 6/1/2020 | Date End: 8/19/2024 | Client: Alfard, Mary | Users: | Case: Alfardi v. Covenant Aviation | Activity Types:

Date	Client	Case	Description	Billable Time	Billable Amount
L100 - Case Assessment, Development, and Administration					
Interview client, review client's employment records, research the employer, interview other employees, legal research re potential claims, etc.					
Totals Amounts for Activity Type - Case Assessment, Development, etc.				8.10	\$6,450.00
L110 - Fact Investigation/Development					
Obtain and review client's personnel records, obtain records from DLSE and other sources, investigate employer, examine pending/past cases, etc.					
Totals Amounts for Activity Type - Fact Investigation/Development				11.40	\$9,702.50
A106 - Communication with Client					
Correspondence, emails, telephone calls, and meetings with client.					
Totals Amounts for Activity Type - Communicate with Client				9.60	\$9,775.00
A107 - Communication with Defense Counsel					
Correspondence, emails, telephone calls, and meetings with defense counsel.					
Totals Amounts for Activity Type - Communication/Correspondence/Meetings with Defense Counsel				40.10	\$39,412.50
L200 - Pleadings / Motions					
Prepare complaint, case management statements, status reports, stipulations, prepare opposition to Motion to Compel Arbitration, and other pleadings, etc.					
Totals Amounts for Activity Type Pleadings / Motions				72.00	\$61,375.00
L300 - Discovery					
Prepare written discovery requests, respond to written discovery requests, examine and analyze defendant's document production, prepare spreadsheets to analyze data/info, etc.					
Totals Amounts for Activity Type Discovery				84.70	\$74,435.00
L500 - Appeal / Writ					
Analyze/evaluate Defendant's appeal and related tasks.					
Totals Amounts for Activity Type Appeal / Writ				4.70	\$4,037.50
A109 - Court Hearings					
Prepare for and attend court hearings and perform related tasks, etc.					
Totals Amounts for Activity Type Court Hearing				4.20	\$4,005.00
A102 - Legal Research					
Legal research for recent case law re: claims alleged in the complaint, analyze rulings in other similar cases in state and federal courts, etc.					
Totals Amounts for Activity Type Research				21.30	\$18,850.00
L160 - Settlement Discussions/Mediations					
Obtain necessary info/docs/data for two mediations, analyze/review classwide data, prepare mediation briefs, attend mediations, additional negotiations, etc.					
Totals Amounts for Activity Type Settlement Discussions/Mediations				148.20	\$129,545.00
L160 - Negotiate and Draft Settlement Agreement / Motion for Settlement Approval					
Prepare MOU, long form settlement agreement, class notice, negotiate terms with defense counsel, prepare MPA, MFA, Orders, and Judgment; communicate with settlement administrators; communicate with class members.					
Totals Amounts for Activity Type Settlement Related				112.20	\$102,167.50
Grand Total				516.50	\$459,755.00

EXHIBIT B

LEGAL BILLING REPORT

By Region. By Firm.

Volume 17, Number 3
December 2015



THOMSON REUTERS

California Region

Firm **Snell & Wilmer**

Firm Size: 419 Firm Rank 104

Court Name Arizona
Case Name Xhibit Corp., et al.,
Case Number 2:15-bk-00679-BKM

For fee applications
1/22/2015 through 9/11/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Eric S. Pezold	Partner	CA	2004	2004	\$520	0.10	\$52.00
Total:						0.10	\$52.00

Firm **Klee, Tuchin, Bogdanoff & Stern, LLP**

Firm Size: 19 Firm Rank 0

Court Name California Central
Case Name State Fish Co., Inc.
Case Number 2:15-bk-11084-SK

For fee applications
6/1/2015 through 9/30/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Kenneth Klee	Partner	CA	1974	1975	\$1,300	0.20	\$260.00
David Stern	Partner	CA	1975	1975	\$1,080	189.50	\$204,660.00
Michael Tuchin	Partner	CA	1990	1990	\$1,080	137.10	\$148,068.00
Maria Sountas Argiropoulos	Partner	CA	2006	2006	\$675	25.20	\$17,010.00
Colleen M. Keating	Counsel	CA	2008	2008	\$650	111.20	\$72,280.00
Jonathan M. Weiss	Associate	CA	2012	2012	\$475	525.00	\$249,375.00
Kathryn T. Zwicker	Associate	CA	1986	1986	\$440	9.50	\$4,180.00
Sasha M. Gurvitz	Associate	CA	2014	2014	\$395	40.80	\$16,116.00
Total:						1038.50	\$711,949.00

Firm **Bracewell & Giuliani LLP**

Firm Size: 422 Firm Rank 103

Court Name Delaware
Case Name Optim Energy, LLC, et al,
Case Number 14-10262 (BLS)

For fee applications
2/12/2014 through 10/15/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Joe R. Hull	Partner	CA	1969	1969	\$790	0.60	\$474.00
Total:						0.60	\$474.00

Firm **Brown Rudnick LLP**

Firm Size: 184 Firm Rank 211

Court Name Delaware
Case Name Corinthian Colleges Inc.
Case Number 15-10952 (KJC)

For fee applications
5/4/2015 through 9/21/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Ronald Rus	Partner	CA	1975	1975	\$880	1.50	\$1,320.00
Lauren E. Curry	Partner	CA	2010	2010	\$730	78.90	\$57,597.00
Total:						80.40	\$58,917.00

California Region

Firm Cooley LLP

Firm Size: 613 Firm Rank 63

Court Name Delaware

For fee applications

Case Name RS Legacy Corporation

6/1/2015 through 10/7/2015

Case Number 15-10197 (BLS)

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Seth A. Rafkin	Partner	CA	1998	1998	\$810	0.50	\$405.00
Janet D. Gertz	Associate	CA	2004	2004	\$755	14.60	\$11,023.00
Shannon L. Sorrells	Associate	CA	2011	2011	\$595	2.80	\$1,666.00
Total:						17.90	\$13,094.00

Firm Gibson Dunn & Crutcher, LLP

Firm Size: 1039 Firm Rank 21

Court Name Delaware

For fee applications

Case Name ENERGY FUTURE HOLDINGS CORP

8/1/2015 through 8/31/2015

Case Number 14-10979 (CSS)

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Matthew Bouslog	Associate	CA	2011	2011	\$625	5.10	\$3,187.50
Total:						5.10	\$3,187.50

Firm Kirkland & Ellis LLP

Firm Size: 1442 Firm Rank 13

Court Name Delaware

For fee applications

Case Name ENERGY FUTURE HOLDINGS CORP

8/1/2015 through 8/31/2015

Case Number 14-10979 (CSS)

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Mike Beinus	Partner	CA	1999	1999	\$1,220	3.10	\$3,782.00
Mark E. McKane	Partner	CA	1997	1997	\$1,025	198.50	\$203,462.50
Christopher Keegan	Partner	CA	2002	2002	\$855	75.50	\$64,552.50
Michael Esser	Associate	CA	2009	2009	\$825	213.40	\$176,055.00
Alexander Davis	Associate	CA	2012	2012	\$710	192.60	\$136,746.00
Justin Sowa	Associate	CA	2013	2013	\$710	199.70	\$141,787.00
Austin Klar	Associate	CA	2013	2013	\$635	35.00	\$22,225.00
Sarah Stock	Associate	CA	2013	2013	\$635	121.60	\$77,216.00
Anna Terteryan	Associate	CA	2014	2014	\$555	241.80	\$134,199.00
James Barolo	Associate	CA	2014	2014	\$555	108.60	\$60,273.00
Kevin Chang	Associate	CA	2014	2014	\$555	170.80	\$94,794.00
Total:						1560.60	\$1,115,092.00

California Region

Firm **Klee, Tuchin, Bogdanoff & Stern, LLP**

Firm Size: 19 Firm Rank: 0

Court Name: Delaware
Case Name: SEAL123, INC., et al.
Case Number: 15-10081 (CSS)

For fee applications
7/1/2015 through 11/30/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Lee Bogdanoff	Partner	CA	1985	1985	\$1,080	7.30	\$7,884.00
Michael Tuchin	Partner	CA	1990	1990	\$1,080	37.10	\$40,068.00
David Fidler	Partner	CA	1997	1998	\$850	12.70	\$10,795.00
Robert J. Pfister	Partner	CA	2001	2001	\$795	0.20	\$159.00
David M. Guess	Partner	CA	2005	2005	\$695	67.30	\$46,773.50
Maria Sountas Argiropoulos	Partner	CA	2006	2006	\$675	1.70	\$1,147.50
Justin D. Yi	Partner	CA	2009	2009	\$625	0.80	\$500.00
Jonathan M. Weiss	Associate	CA	2012	2012	\$475	34.70	\$16,482.50
Kathryn T. Zwicker	Associate	CA	1986	1986	\$440	12.40	\$5,456.00
Total:						<u>174.20</u>	<u>\$129,265.50</u>

Firm **Morrison & Foerster LLP**

Firm Size: 1025 Firm Rank: 22

Court Name: Delaware
Case Name: ENERGY FUTURE HOLDINGS CORP
Case Number: 14-10979 (CSS)

For fee applications
8/1/2015 through 8/31/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Clara Lim	Associate	CA	2012	2012	\$635	39.80	\$25,273.00
Chika Arakawa	Associate	CA	2013	2013	\$495	8.30	\$4,108.50
Total:						<u>48.10</u>	<u>\$29,381.50</u>

California Region

Firm **Munger Tolles & Olson LLC**

Firm Size: 181 **Firm Rank:** 216

Court Name Delaware

Case Name ENERGY FUTURE HOLDINGS CORP

Case Number 14-10979 (CSS)

For fee applications

8/1/2015 through 8/31/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
John W. Spiegel	Partner	CA	1977	1977	\$1,065	36.30	\$38,659.50
Thomas B. Walper	Partner	CA	1980	1980	\$1,065	184.05	\$196,013.25
Stephen D. Rose	Partner	CA	1991	1991	\$960	29.20	\$28,032.00
Todd J. Rosen	Partner	CA	1999	1999	\$875	53.20	\$46,550.00
Jay M. Fujitani	Partner	CA	1984	1984	\$830	92.50	\$76,775.00
Kevin S. Allred	Partner	CA	1986	1986	\$830	94.50	\$78,435.00
Seth Goldman	Partner	CA	2002	2002	\$750	154.70	\$116,025.00
Bradley R. Schneider	Of Counsel	CA	2004	2004	\$680	115.10	\$78,268.00
Emily A. Bussigel	Associate	CA	2010	2010	\$635	184.80	\$117,348.00
Sam Greenberg	Associate	CA	2010	2010	\$615	61.70	\$37,945.50
Alex D. Terepka	Associate	CA	2012	2012	\$510	89.40	\$45,594.00
Andrea M. Weintraub	Associate	CA	2013	2013	\$510	58.30	\$34,833.00
Sara N. Taylor	Associate	CA	2012	2012	\$510	70.40	\$35,904.00
Peter E. Boos	Associate	CA	2014	2014	\$395	11.40	\$4,503.00
Total:						1245.55	\$934,885.25

Firm **O'Melveny & Myers LLP**

Firm Size: 1193 **Firm Rank:** 16

Court Name Delaware

Case Name Colt Holding Company

Case Number 15-11296 (LSS)

For fee applications

8/1/2015 through 9/30/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
John-Paul Motley	Partner	CA	1999	1999	\$930	6.70	\$6,231.00
Sarah Hoffner	Counsel	CA	2004	2004	\$755	11.20	\$8,456.00
Jeeho Lee	Counsel	CA	2007	2007	\$745	5.00	\$3,725.00
Joannah Caneda	Associate	CA	2015	2015	\$460	4.90	\$2,254.00
Christopher Martin	Associate	CA	2014	2014	\$415	1.20	\$498.00
Joseph Zujkowski	Counsel	CA	2008	2008	\$390	183.60	\$71,604.00
Total:						212.60	\$92,768.00

California Region

Firm **Pachulski Stang Ziehl Young Jones & Wei**

Firm Size: 55 Firm Rank: 0

Court Name Delaware
Case Name DDMG Estate
Case Number 12-12568(BLS)

For fee applications
8/1/2015 through 8/31/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Debra I. Grassgreen	Partner	CA	1991	1994	\$925	1.30	\$1,202.50
William Ramseyer	Of Counsel	CA	1980	1980	\$650	1.10	\$715.00
Total:						2.40	\$1,917.50

Firm **Pachulski Stang Ziehl Young Jones & Wei**

Firm Size: 55 Firm Rank: 0

Court Name Delaware
Case Name ICL Holdings Company, INC
Case Number 12-13319

For fee applications
6/1/2015 through 8/31/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
William L. Ramseyer	Of Counsel	CA	1980	1980	\$650	7.60	\$4,940.00
Total:						7.60	\$4,940.00

Firm **Pachulski Stang Ziehl Young Jones & Wei**

Firm Size: 55 Firm Rank: 0

Court Name Delaware
Case Name NE OPCO Inc
Case Number 1:13-BK-11483

For fee applications
8/1/2015 through 9/30/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Andrew W. Caine	Partner	CA	1983	1983	\$925	0.20	\$185.00
William L. Ramseyer	Of Counsel	CA	1980	1980	\$650	1.30	\$845.00
William Ramseyer	Of Counsel	CA	1980	1980	\$650	2.10	\$1,365.00
Total:						3.60	\$2,395.00

Firm **Pachulski Stang Ziehl Young Jones & Wei**

Firm Size: 55 Firm Rank: 0

Court Name Delaware
Case Name SEAL123, INC., et al.
Case Number 15-10081 (CSS)

For fee applications
7/1/2015 through 11/30/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Andrew W. Caine	Of Counsel	CA	1983	1983	\$925	0.40	\$370.00
Jeffrey Pomerantz	Partner	CA	1989	1989	\$895	0.90	\$805.50
Shirley S. Cho	Of Counsel	CA	1997	1997	\$750	13.10	\$9,825.00
Total:						14.40	\$11,000.50

California Region

Firm **Pachulski Stang Ziehl Young Jones & Wei**

Firm Size: 55 Firm Rank: 0

Court Name: Delaware

Case Name: SS Body Armor I, INC

Case Number: 10-11255-(PJW)

For fee applications:

9/1/2014 through 9/30/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Alan J. Kornfeld	Partner	CA	1987	1987	\$925	8.90	\$8,232.50
Andrew Caine	Of Counsel	CA	1983	1983	\$895	0.20	\$179.00
David J. Barton	Partner	CA	1981	1981	\$850	0.30	\$255.00
David M. Bertenthal	Partner	CA	1989	1993	\$850	10.00	\$8,500.00
Maxim B. Litvak	Partner	CA	2001	2001	\$775	1.70	\$1,317.50
Joshua M. Fried	Partner	CA	2006	2006	\$725	2.80	\$2,030.00
Jonathan Kim	Of Counsel	CA	1995	1995	\$665	0.80	\$532.00
Elissa Wagner	Of Counsel	CA	2000	2001	\$625	46.60	\$29,125.00
William Ramseyer	Of Counsel	CA	1980	1980	\$625	2.40	\$1,500.00
Total:						<u>73.70</u>	<u>\$51,671.00</u>

Firm **Paul Hastings LLP**

Firm Size: 881 Firm Rank: 30

Court Name: Delaware

Case Name: MolyCorp, Inc

Case Number: 15-11357 (CSS)

For fee applications:

8/1/2015 through 9/30/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Leslie A. Plaskon	Partner	CA	1988	1988	\$1,150	111.10	\$127,765.00
Peter Burke	Partner	CA	1996	1996	\$975	3.90	\$3,802.50
Daniel C. Tola	Associate	CA	2013	2013	\$550	20.50	\$11,275.00
Kevin Kraft	Associate	CA	2014	2014	\$495	4.80	\$2,376.00
Total:						<u>140.30</u>	<u>\$145,218.50</u>

Firm **Paul Hastings LLP**

Firm Size: 881 Firm Rank: 30

Court Name: Delaware

Case Name: SEAL123, INC., et al.

Case Number: 15-10081 (CSS)

For fee applications:

7/1/2015 through 11/30/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Nancy L. Abell	Partner	CA	1979	1979	\$995	0.90	\$895.50
Stephen D. Cooke	Partner	CA	1985	1985	\$973	0.30	\$292.13
Total:						<u>1.20</u>	<u>\$1,187.63</u>

California Region

Firm Quinn Emanuel Urquhart & Sullivan, LLP

Firm Size: 647 Firm Rank 58

Court Name Delaware
Case Name RS Legacy Corporation
Case Number 15-10197 (BLS)

For fee applications
6/1/2015 through 10/7/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Benjamin Finestone	Partner	CA	2004	2005	\$840	11.20	\$9,408.00
Katherine Scherling	Associate	CA	2008	2010	\$735	211.50	\$155,452.50
Randa Osman	Partner	CA	1990	1990	\$695	47.20	\$32,804.00
Total:						<u>269.90</u>	<u>\$197,664.50</u>

Firm Robins Kaplan LLP

Firm Size: 250 Firm Rank 0

Court Name Delaware
Case Name Corinthian Colleges Inc
Case Number 15-10952 (KIC)

For fee applications
5/4/2015 through 9/21/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Roman M. Silberfeld	Partner	CA	1995	1995	\$810	5.70	\$4,617.00
Howard Weg	Partner	CA	2014	2014	\$795	60.30	\$47,938.50
David B. Shemano	Partner	CA	2014	2014	\$675	17.00	\$11,475.00
Scott F. Gautier	Partner	CA	2014	2014	\$675	452.00	\$305,100.00
James P. Menton, Jr.	Partner	CA	2014	2014	\$650	17.40	\$11,310.00
Cynthia C. Hernandez	Associate	CA	2009	2009	\$470	397.90	\$187,013.00
Lorie A. Ball	Associate	CA	2014	2014	\$450	568.10	\$255,645.00
Amy Churan	Partner	CA	2001	2001	\$420	18.10	\$7,602.00
Total:						<u>1536.50</u>	<u>\$830,700.50</u>

Firm Torys LLP

Firm Size: 236 Firm Rank 0

Court Name Delaware
Case Name Nortel Networks Inc.
Case Number 09-10138

For fee applications
8/1/2015 through 8/31/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Sheila Block	Partner	CA	1974	1974	\$1,090	9.10	\$9,919.00
Adam Slavens	Associate	CA	2007	2007	\$775	163.00	\$126,325.00
Total:						<u>172.10</u>	<u>\$136,244.00</u>

California Region

Firm **Cooley LLP**

Firm Size: 613 Firm Rank 63

Court Name Virginia Eastern

For fee applications

Case Name Health Diagnostic Laboratory, Inc.

6/7/2015 through 8/31/2015

Case Number 15-32919-KRH

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Aarti G. Reddy	Associate	CA	2010	2010	\$655	11.20	\$7,336.00
Amanda B. Pacheco	Associate	CA	2013	2013	\$470	3.30	\$1,551.00
					Total:	<u>14.50</u>	<u>\$8,887.00</u>

West Region

Firm **Faegre Baker Daniels LLP**

Firm Size: 750 Firm Rank: 0

Court Name Colorado
Case Name ROBERT D. MORDINI, JR.,
Case Number 11-15491-ABC

For fee applications
9/1/2013 through 11/18/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Michael K. Bolton	Partner	CO	2001	2001	\$540	0.50	\$270.00
Brandon K. Oliver	Associate	CO	2010	2010	\$295	3.50	\$1,032.50
Total:						<u>4.00</u>	<u>\$1,302.50</u>

Firm **Greenberg Traurig LLP**

Firm Size: 1699 Firm Rank: 9

Court Name Delaware
Case Name ATLS Acquisition LLC
Case Number 13-10262 (PJW)

For fee applications
8/1/2015 through 8/31/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Matthew L. Hinker	Associate	CO	2010	2010	\$635	2.30	\$1,460.50
Total:						<u>2.30</u>	<u>\$1,460.50</u>

Firm **O'Melveny & Myers LLP**

Firm Size: 1193 Firm Rank: 16

Court Name Delaware
Case Name Colt Holding Company
Case Number 15-11296 (LSS)

For fee applications
8/1/2015 through 9/30/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Robert Blashek	Partner	CO	1977	1977	\$1,075	1.50	\$1,612.50
Peter Friedman	Partner	CO	1998	1998	\$935	107.00	\$100,045.00
Total:						<u>108.50</u>	<u>\$101,657.50</u>

Firm **Jenner & Block LLP**

Firm Size: 433 Firm Rank: 98

Court Name Alabama Northern
Case Name Walter Energy Inc
Case Number 15-02741-TOM11

For fee applications
7/15/2015 through 10/31/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Jarrell A. Cook	Associate	WA	2014	2014	\$460	10.00	\$4,600.00
Total:						<u>10.00</u>	<u>\$4,600.00</u>

West Region

Firm Akin Gump Strauss Hauer & Feld LLP

Firm Size: 790 Firm Rank: 40

Court Name Delaware

Case Name Quicksilver Resources Inc

Case Number 15-10585(LSS)

For fee applications

7/1/2015 through 10/31/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Matthew W. Kinskey	Associate	WA	2014	2014	\$430	115.10	\$49,493.00
Total:						<u>115.10</u>	<u>\$49,493.00</u>

Firm Bracewell & Giuliani LLP

Firm Size: 422 Firm Rank: 103

Court Name Delaware

Case Name Optim Energy, LLC, et al,

Case Number 14-10262 (BLS)

For fee applications

2/12/2014 through 10/15/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Nancy Jo Nelson	Partner	WA	1984	1984	\$975	28.60	\$27,885.00
Jacqueline Java	Counsel	WA	2000	2000	\$670	0.90	\$603.00
Jacqueline Java	Counsel	WA	2000	2000	\$650	54.50	\$35,432.63
Sandra Snyder	Associate	WA	2006	2006	\$529	106.80	\$56,583.71
Sandra Snyder	Associate	WA	2006	2006	\$520	2.30	\$1,196.00
Blake Urban	Associate	WA	2009	2009	\$481	5.10	\$2,455.50
Serena Rwejuna	Associate	WA	2013	2013	\$363	37.00	\$13,449.87
Total:						<u>235.20</u>	<u>\$137,605.71</u>

Firm Foley & Lardner LLP

Firm Size: 874 Firm Rank: 31

Court Name Delaware

Case Name Universal Cooperatives Inc

Case Number 14-11187 (MFW)

For fee applications

8/1/2015 through 8/31/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Jack G. Haake	Associate	WA	2011	2011	\$315	12.40	\$3,906.00
Total:						<u>12.40</u>	<u>\$3,906.00</u>

Firm Jones Day

Firm Size: 2407 Firm Rank: 3

Court Name Delaware

Case Name MolyCorp, Inc

Case Number 15-11357 (CSS)

For fee applications

8/1/2015 through 9/30/2015

Name	Title	State	Graduated	Admitted	Rate	Hours	Fees
Kent L. Killelea	Of Counsel	WA	1984	1984	\$750	5.30	\$3,975.00
Total:						<u>5.30</u>	<u>\$3,975.00</u>

California Region

Title	Professional	Firm	Graduated	Admitted	State	Rate	Hours	Total
Partner	Kenneth Klee	Klee, Tuchin, Bogdanoff & Stern, LLP	1975	1974	CA	\$1,300	0.2	\$260.00
Partner	Mike Boinus	Kirkland & Ellis LLP	1999	1999	CA	\$1,220	3.1	\$3,782.00
Partner	Leslie A. Plaskon	Paul Hastings LLP	1988	1988	CA	\$1,150	111.1	\$127,765.00
Partner	Sheila Block	Torys LLP	1974	1974	CA	\$1,090	9.1	\$9,919.00
Partner	David Stern	Klee, Tuchin, Bogdanoff & Stern, LLP	1975	1975	CA	\$1,080	189.5	\$204,660.00
Partner	Lee Bogdanoff	Klee, Tuchin, Bogdanoff & Stern, LLP	1985	1985	CA	\$1,080	7.3	\$7,884.00
Partner	Michael Tuchin	Klee, Tuchin, Bogdanoff & Stern, LLP	1990	1990	CA	\$1,080	174.2	\$188,136.00
Partner	John W. Spiegel	Munger Tolles & Olson LLC	1977	1977	CA	\$1,065	36.3	\$38,659.50
Partner	Thomas B. Walper	Munger Tolles & Olson LLC	1980	1980	CA	\$1,065	184.05	\$196,013.25
Partner	Mark E. McKane	Kirkland & Ellis LLP	1997	1997	CA	\$1,025	198.5	\$203,462.50
Partner	Nancy L. Abell	Paul Hastings LLP	1979	1979	CA	\$995	0.9	\$895.50
Partner	Peter Burke	Paul Hastings LLP	1996	1996	CA	\$975	3.9	\$3,802.50
Partner	Stephen D. Cooke	Paul Hastings LLP	1985	1985	CA	\$973	0.3	\$292.13
Partner	Stephen D. Rose	Munger Tolles & Olson LLC	1991	1991	CA	\$960	29.2	\$28,032.00
Partner	John-Paul Motley	O'Melveny & Myers LLP	1999	1999	CA	\$930	6.7	\$6,231.00
Partner	Alan J. Kornfeld	Pachulski Stang Ziehl Young Jones & Weintraub	1987	1987	CA	\$925	8.9	\$8,232.50
Of Counsel	Andrew W. Caine	Pachulski Stang Ziehl Young Jones & Weintraub	1983	1983	CA	\$925	0.6	\$555.00
Partner	Debra I. Grassgreen	Pachulski Stang Ziehl Young Jones & Weintraub	1994	1991	CA	\$925	1.3	\$1,202.50
Of Counsel	Andrew Caine	Pachulski Stang Ziehl Young Jones & Weintraub	1983	1983	CA	\$895	0.2	\$179.00
Partner	Jeffrey Pomerantz	Pachulski Stang Ziehl Young Jones & Weintraub	1989	1989	CA	\$895	0.9	\$805.50
Partner	Ronald Rus	Brown Rudnick LLP	1975	1975	CA	\$880	1.5	\$1,320.00
Partner	Todd J. Rosen	Munger Tolles & Olson LLC	1999	1999	CA	\$875	53.2	\$46,550.00
Partner	Christopher Keegan	Kirkland & Ellis LLP	2002	2002	CA	\$855	75.5	\$64,552.50
Partner	David Fidler	Klee, Tuchin, Bogdanoff & Stern, LLP	1998	1997	CA	\$850	12.7	\$10,795.00
Partner	David J. Barton	Pachulski Stang Ziehl Young Jones & Weintraub	1981	1981	CA	\$850	0.3	\$255.00
Partner	David M. Bertenthal	Pachulski Stang Ziehl Young Jones & Weintraub	1993	1989	CA	\$850	10	\$8,500.00
Partner	Benjamin Finestone	Quinn Emanuel Urquhart & Sullivan, LLP	2005	2004	CA	\$840	11.2	\$9,408.00
Partner	Jay M. Fujitani	Munger Tolles & Olson LLC	1984	1984	CA	\$830	92.5	\$76,775.00
Partner	Kevin S. Allred	Munger Tolles & Olson LLC	1986	1986	CA	\$830	94.5	\$78,435.00
Associate	Michael Esser	Kirkland & Ellis LLP	2009	2009	CA	\$825	213.4	\$176,055.00
Partner	Roman M. Silberfeld	Robins Kaplan LLP	1995	1995	CA	\$810	5.7	\$4,617.00
Partner	Seth A. Rafkin	Cooley LLP	1998	1998	CA	\$810	0.5	\$405.00
Partner	Howard Weg	Robins Kaplan LLP	2014	2014	CA	\$795	60.3	\$47,938.50
Partner	Robert J. Pfister	Klee, Tuchin, Bogdanoff & Stern, LLP	2001	2001	CA	\$795	0.2	\$159.00
Partner	Joe R. Hull	Bracewell & Giuliani LLP	1969	1969	CA	\$790	0.6	\$474.00
Associate	Adam Slavens	Torys LLP	2007	2007	CA	\$775	163	\$126,325.00
Partner	Maxim B. Litvak	Pachulski Stang Ziehl Young Jones & Weintraub	2001	2001	CA	\$775	1.7	\$1,317.50
Associate	Janet D. Gertz	Cooley LLP	2004	2004	CA	\$755	14.6	\$11,023.00
Counsel	Sarah Hoffner	O'Melveny & Myers LLP	2004	2004	CA	\$755	11.2	\$8,456.00
Partner	Seth Goldman	Munger Tolles & Olson LLC	2002	2002	CA	\$750	154.7	\$116,025.00
Of Counsel	Shirley S. Cho	Pachulski Stang Ziehl Young Jones & Weintraub	1997	1997	CA	\$750	13.1	\$9,825.00

California Region

Title	Professional	Firm	Graduated	Admitted	State	Rate	Hours	Total
Counsel	Jeeho Lee	O'Melveny & Myers LLP	2007	2007	CA	\$745	5	\$3,725.00
Associate	Katherine Scherling	Quinn Emanuel Urquhart & Sullivan, LLP	2010	2008	CA	\$735	211.5	\$155,452.50
Partner	Lauren E. Curry	Brown Rudnick LLP	2010	2010	CA	\$730	78.9	\$57,597.00
Partner	Joshua M. Fried	Pachulski Stang Ziehl Young Jones & Weintraub	2006	2006	CA	\$725	2.8	\$2,030.00
Associate	Alexander Davis	Kirkland & Ellis LLP	2012	2012	CA	\$710	192.6	\$136,746.00
Associate	Justin Sowa	Kirkland & Ellis LLP	2013	2013	CA	\$710	199.7	\$141,787.00
Partner	David M. Guess	Klee, Tuchin, Bogdanoff & Stern, LLP	2005	2005	CA	\$695	67.3	\$46,773.50
Partner	Randa Osman	Quinn Emanuel Urquhart & Sullivan, LLP	1990	1990	CA	\$695	47.2	\$32,804.00
Of Counsel	Bradley R. Schneider	Munger Tolles & Olson LLC	2004	2004	CA	\$680	115.1	\$78,268.00
Partner	David B. Shemano	Robins Kaplan LLP	2014	2014	CA	\$675	17	\$11,475.00
Partner	Maria Sountas Argiropoulos	Klee, Tuchin, Bogdanoff & Stern, LLP	2006	2006	CA	\$675	26.9	\$18,157.50
Partner	Scott F. Gautier	Robins Kaplan LLP	2014	2014	CA	\$675	452	\$305,100.00
Of Counsel	Jonathan Kim	Pachulski Stang Ziehl Young Jones & Weintraub	1995	1995	CA	\$665	0.8	\$532.00
Associate	Aarti G. Reddy	Cooley LLP	2010	2010	CA	\$655	11.2	\$7,336.00
Counsel	Colleen M. Keating	Klee, Tuchin, Bogdanoff & Stern, LLP	2008	2008	CA	\$650	111.2	\$72,280.00
Partner	James P. Menton, Jr.	Robins Kaplan LLP	2014	2014	CA	\$650	17.4	\$11,310.00
Of Counsel	William L. Ramseyer	Pachulski Stang Ziehl Young Jones & Weintraub	1980	1980	CA	\$650	8.9	\$5,785.00
Of Counsel	William Ramseyer	Pachulski Stang Ziehl Young Jones & Weintraub	1980	1980	CA	\$650	3.2	\$2,080.00
Associate	Austin Klar	Kirkland & Ellis LLP	2013	2013	CA	\$635	35	\$22,225.00
Associate	Clara Lim	Morrison & Foerster LLP	2012	2012	CA	\$635	39.8	\$25,273.00
Associate	Emily A. Bussigel	Munger Tolles & Olson LLC	2010	2010	CA	\$635	184.8	\$117,348.00
Associate	Sarah Stock	Kirkland & Ellis LLP	2013	2013	CA	\$635	121.6	\$77,216.00
Of Counsel	Elissa Wagner	Pachulski Stang Ziehl Young Jones & Weintraub	2001	2000	CA	\$625	46.6	\$29,125.00
Partner	Justin D. Yi	Klee, Tuchin, Bogdanoff & Stern, LLP	2009	2009	CA	\$625	0.8	\$500.00
Associate	Matthew Bouslog	Gibson Dunn & Crutcher, LLP	2011	2011	CA	\$625	5.1	\$3,187.50
Of Counsel	William Ramseyer	Pachulski Stang Ziehl Young Jones & Weintraub	1980	1980	CA	\$625	2.4	\$1,500.00
Associate	Sam Greenberg	Munger Tolles & Olson LLC	2010	2010	CA	\$615	61.7	\$37,945.50
Associate	Shannon L. Sorrells	Cooley LLP	2011	2011	CA	\$595	2.8	\$1,666.00
Associate	Anna Terteryan	Kirkland & Ellis LLP	2014	2014	CA	\$555	241.8	\$134,199.00
Associate	James Barolo	Kirkland & Ellis LLP	2014	2014	CA	\$555	108.6	\$60,273.00
Associate	Kevin Chang	Kirkland & Ellis LLP	2014	2014	CA	\$555	170.8	\$94,794.00
Associate	Daniel C. Tola	Paul Hastings LLP	2013	2013	CA	\$550	20.5	\$11,275.00
Partner	Eric S. Pezold	Snell & Wilmer	2004	2004	CA	\$520	0.1	\$52.00
Associate	Alex D. Terepka	Munger Tolles & Olson LLC	2012	2012	CA	\$510	89.4	\$45,594.00
Associate	Andrea M. Weintraub	Munger Tolles & Olson LLC	2013	2013	CA	\$510	68.3	\$34,833.00
Associate	Sara N. Taylor	Munger Tolles & Olson LLC	2012	2012	CA	\$510	70.4	\$35,904.00
Associate	Chika Arakawa	Morrison & Foerster LLP	2013	2013	CA	\$495	8.3	\$4,108.50
Associate	Kevin Kraft	Paul Hastings LLP	2014	2014	CA	\$495	4.8	\$2,376.00
Associate	Jonathan M. Weiss	Klee, Tuchin, Bogdanoff & Stern, LLP	2012	2012	CA	\$475	559.7	\$265,857.50
Associate	Amanda B. Pacheco	Cooley LLP	2013	2013	CA	\$470	3.3	\$1,551.00
Associate	Cynthia C. Hernandez	Robins Kaplan LLP	2009	2009	CA	\$470	397.9	\$187,013.00

California Region

Title	Professional	Firm	Graduated	Admitted	State	Rate	Hours	Total
Associate	Joannah Caneda	O'Melveny & Myers LLP	2015	2015	CA	\$460	4.9	\$2,254.00
Associate	Lorie A. Ball	Robins Kaplan LLP	2014	2014	CA	\$450	568.1	\$255,645.00
Associate	Kathryn T. Zwicker	Klee, Tuchin, Bogdanoff & Stern, LLP	1986	1986	CA	\$440	21.9	\$9,636.00
Partner	Amy Churan	Robins Kaplan LLP	2001	2001	CA	\$420	18.1	\$7,602.00
Associate	Christopher Martin	O'Melveny & Myers LLP	2014	2014	CA	\$415	1.2	\$498.00
Associate	Peter E. Boos	Munger Tolles & Olson LLC	2014	2014	CA	\$395	11.4	\$4,503.00
Associate	Sasha M. Gurvitz	Klee, Tuchin, Bogdanoff & Stern, LLP	2014	2014	CA	\$395	40.8	\$16,116.00
Counsel	Joseph Zujkowski	O'Melveny & Myers LLP	2008	2008	CA	\$390	183.6	\$71,604.00

West Region

Title	Professional	Firm	Graduated	Admitted	State	Rate	Hours	Total
Partner	Robert Blashek	O'Melveny & Myers LLP	1977	1977	CO	\$1,075	1.5	\$1,612.50
Partner	Peter Friedman	O'Melveny & Myers LLP	1998	1998	CO	\$935	107	\$100,045.00
Associate	Matthew L. Hinker	Greenberg Traurig LLP	2010	2010	CO	\$635	2.3	\$1,460.50
Partner	Michael K. Bolton	Faegre Baker Daniels LLP	2001	2001	CO	\$540	0.5	\$270.00
Associate	Brandan K. Oliver	Faegre Baker Daniels LLP	2010	2010	CO	\$295	3.5	\$1,032.50
Partner	Nancy Jo Nelson	Bracewell & Giuliani LLP	1984	1984	WA	\$975	28.6	\$27,885.00
Of Counsel	Kent L. Killelea	Jones Day	1984	1984	WA	\$750	5.3	\$3,975.00
Counsel	Jacqueline Java	Bracewell & Giuliani LLP	2000	2000	WA	\$670	0.9	\$603.00
Counsel	Jacqueline Java	Bracewell & Giuliani LLP	2000	2000	WA	\$650	54.5	\$35,432.63
Associate	Sandra Snyder	Bracewell & Giuliani LLP	2006	2006	WA	\$529	106.8	\$56,583.71
Associate	Sandra Snyder	Bracewell & Giuliani LLP	2006	2006	WA	\$520	2.3	\$1,196.00
Associate	Blake Urban	Bracewell & Giuliani LLP	2009	2009	WA	\$481	5.1	\$2,455.50
Associate	Jarrell A. Cook	Jenner & Block LLP	2014	2014	WA	\$460	10	\$4,600.00
Associate	Matthew W. Kinskey	Akin Gump Strauss Hauer & Feld LLP	2014	2014	WA	\$430	115.1	\$49,493.00
Associate	Serena Rwejuna	Bracewell & Giuliani LLP	2013	2013	WA	\$363	37	\$13,449.87
Associate	Jack G. Haake	Foley & Lardner LLP	2011	2011	WA	\$315	12.4	\$3,906.00

LAFFEY MATRIX

[History](#)
[Case Law](#)
[See the Matrix](#)
[Contact us](#)
[Home](#)

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375

6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363
----------------	--------	------	-------	-------	-------	-------	-------

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $\frac{1}{2}$ Years Out of Law School $\frac{1}{2}$ is calculated from June 1 of each year, when most law students graduate. $\frac{1}{2}$ 1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $\frac{1}{2}$ 4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $\frac{1}{2}$ 1-3" from June 1, 1996 until May 31, 1999, would move into tier $\frac{1}{2}$ 4-7" on June 1, 1999, and tier $\frac{1}{2}$ 8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT C

Aequitas Legal Group - Expense Report

Date Start: 5/1/2020 | Date End: 8/22/2024 | Clients: Alfardi, Mary | Cases: Alfardi v. Covenant Aviation | Users: All | Case Type: All | Group By: Client

Expense Date	Invoice Id	Client	Case	User	Expense Type	Description	Status	Cost	Bill Price	Reimbursable	Payment Applied Date	Paid Status
Alfardi, Mary												
10/05/2020		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	E-Filing Service	Civil Complaint/Petition/Other First Paper	Ready For Billing	\$1,450.00	\$1,450.00	Yes		N/A
10/19/2020		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	Attorney Service	Attorney Service Invoice #36404 regarding Proof of Service of Summons and Complaint	Ready For Billing	\$65.00	\$65.00	Yes		N/A
12/29/2020		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	Attorney Service	Invoice regarding Service of Amended Summons and Complaint on Defendant	Ready For Billing	\$65.00	\$65.00	Yes		N/A
02/23/2021		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	E-Filing Service	One Legal Filing of P's Case Mgmt Stmt	Ready For Billing	\$17.00	\$17.00	Yes		N/A
07/12/2021		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	Arbitration Fee	Attorney Service regarding Opposition to Motion to Compel Arbitration	Ready For Billing	\$123.25	\$123.25	Yes		N/A
09/27/2021		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	E-Filing Service	E-Filing and E-Service Fee	Ready For Billing	\$17.50	\$17.50	Yes		N/A
12/02/2021		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	Mediation Fee	Mediation Fee	Ready For Billing	\$5,450.00	\$5,450.00	Yes		N/A
01/11/2022		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	E-Filing Service	Cost for Plaintiff's Copy of Clerk's Transcript	Ready For Billing	\$158.00	\$158.00	Yes		N/A
02/18/2022		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	Mailing/Postage	Mailing of Mediation Brief as required by Mediator	Ready For Billing	\$29.95	\$29.95	Yes		N/A
04/07/2023		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	E-Filing Service	Notice of File&Serve Express Filing of CMC Continuance	Ready For Billing	\$20.00	\$20.00	Yes		N/A
04/13/2023		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	E-Filing Service	Notice of File&Serve Express Filing of CMC Continuance and EDITED transaction	Ready For Billing	\$20.00	\$20.00	Yes		N/A
08/29/2023		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	E-Filing Service	File&Serve Express Filing of Stip and Prop Order re Transfer Venue	Ready For Billing	\$20.00	\$20.00	Yes		N/A
11/09/2023		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	E-Filing Service	Change of Venue/Transmittal of Papers	Ready For Billing	\$50.00	\$50.00	Yes		N/A
12/04/2023		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	E-Filing Service	GreenFiling of Jt Stip and Prop Order re Briefing Schedule for MPA	Ready For Billing	\$33.48	\$33.48	Yes		N/A
12/28/2023		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	E-Filing Service	GreenFiling of MPA, Prop Order, 4 Decl iso MPA	Ready For Billing	\$105.93	\$105.93	Yes		N/A
03/22/2024		Alfardi, Mary	Alfardi v. Covenant Aviation	Michaela Murphy	E-Filing Service	GreenFiling Amended Prop Order Granting MPA	Ready For Billing	\$13.92	\$13.92	Yes		N/A
Totals Billable Amounts for Alfardi, Mary								\$7,639.03	\$7,639.03			
Grand Total								\$7,639.03	\$7,639.03			