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individually and on behalf of all others similarly-situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF LOS ANGELES**

LUIS LOPEZ, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

GE UNITED TECHNOLOGIES, LLC, a  
Delaware Limited Liability Company d/b/a  
GRASSDOOR, and DOES 1 through 10,  
Inclusive,

Defendants.

Case No. 20STCV34691

ASSIGNED FOR ALL PURPOSES TO:  
The Honorable William F. Highberger  
Department SS10

**CLASS ACTION**

**DECLARATION OF DIANA M. KHOURY IN  
SUPPORT OF MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT AND ENTERING  
JUDGMENT**

Date: October 24, 2022

Time: 11:30 a.m.

Dept.: 10

Judge: William F. Highberger

Complaint filed: September 11, 2020

Trial date: Not set

1 I, Diana M. Khoury, declare as follows:

2 1. I am a Partner with the law firm of Cohelan Khoury & Singer, co-counsel of  
3 record for Plaintiff and the Settlement Class. I submit this Declaration in Support of Plaintiff's  
4 Motion for Order Granting Final Approval of Class Action Settlement. The following facts are  
5 within my personal knowledge and if called to testify I could and would competently testify to  
6 them.

7 2. I am a 1986 Western State University College of Law graduate and was admitted  
8 to the California State Bar in June, 1987. I am admitted to practice in all state courts in  
9 California and in the all federal courts in California.

10 3. In 1981, Timothy D. Cohelan and Isam C. Khoury formed Cohelan & Khoury, a  
11 Partnership of Professional Law Corporations, and within a few years began to focus on class  
12 actions. In 2009, Cohelan & Khoury became Cohelan Khoury & Singer. Our firm represents  
13 plaintiffs in complex, class and representative action litigation, including wage and hour, labor  
14 and employment, antitrust, consumer protection, construction defect and other public interest  
15 type class and representative actions.

16 4. I am AV – Preeminent rated by Martindale-Hubbell. For the years, 2012 through  
17 the present, I, together with my partners Isam C. Khoury and Michael D. Singer, have been  
18 selected by our peers based on ethics, experience and reputation as Super Lawyers in Civil  
19 Litigation by the Southern California Super Lawyers Magazine for the years. Mr. Singer was  
20 admitted as a fellow to the College of Labor and Employment Attorneys in 2020, and named to  
21 the Daily Journal 2012, 2013, and 2018 list of Top California Labor and Employment  
22 Attorneys.

23 5. Cohelan Khoury & Singer has been certified by the State Bar of California to  
24 provide the Mandatory Continuing Legal Education activity entitled "Litigating California Class  
25 Actions" and has conducted MCLE certified seminars on this topic. Senior Partner, Timothy D.  
26 Cohelan, is the author of Cohelan on California Class Actions (1997-2022, updated annually),  
27 part of Thomson Reuters Expert Series updated annually. Michael D. Singer is a contributing  
28 author on the CEB publication California Wage and Hour Law: Compliance and Litigation

(2010-2022 updated annually), in which he wrote the opening chapter overview on California Wage and Hour laws, including the public policy underpinnings for those laws, and the Private Attorneys General Act (PAGA) Claim chapter. He is also a contributing author to the CEB Practitioner (2020), including guidelines for oral argument and forms for PAGA litigation. Mr. Singer has served as a columnist for the California State Bar, Litigation Section on wage and hour litigation and has contributed articles on wage and hour and class action issues through the years to numerous California publications. Prior to COVID, he typically lectured several times per year for continuing education courses on wage and hour and class action issues at events in San Diego, Orange County, Los Angeles, and San Francisco. For over twelve years, Mr. Singer has served as wage and hour amicus co-chair and liaison for the California Employment Lawyers Association, drafting, reviewing, and coordinating amicus filings on wage and hour issues in the California Supreme Court and Courts of Appeal. He has been engaged in the practice of labor and employment law since 2000, handling well over 200 wage and hour class and PAGA actions and several individual labor cases. He has litigated several types of employment actions, including complex ERISA employee welfare benefit plan cases, as well as wage and hour class actions before Federal and State Courts in California. In 2014, Mr. Singer, along with Partner J. Jason Hill, tried a wage and hour class action involving claims for illegally deducted wages and unreimbursed expenses. *Dilts v Penske Logistics LLC, Inc.* Mr. Singer successfully appealed the trial court ruling in *Dilts* finding state laws preempted by the FAAAA for truck drivers.

6. Since admission to the California State Bar, I have been a member of the San Diego County Bar Association, Consumer Attorneys of San Diego, Consumer Attorneys of California, and having served on numerous committees throughout the years for these organizations. For six years from 2010 through 2015, I served on the Board of Directors for Consumer Attorneys of San Diego, and chaired numerous committees during those terms.

7. As a part of our overall firm philosophy lawyers perform community service and pro bono work. Firm volunteer work includes service through the Legal Aid at Work, San Diego Volunteer Lawyer Program, the San Diego County Bar Foundation and Consumer

Attorneys of San Diego. Since 2014, I have actively served as a director on the San Diego County Bar Foundation, the 501(c)(3) non-profit entity and the charitable arm of the San Diego County Bar Association. Partner Jeff Geraci is past recipient of the Wiley W. Manuel Award for Pro Bono Service, and during law school interned for the ACLU and Equal Rights Assistance assisting on impact litigation class action lawsuits. Mr. Singer has served on the Legal Aid at Work Board of Directors since 2011. Mr. Cohelan served as the Chair of the San Diego Volunteer Lawyers Program from 2015-2018, and currently sits on the Board as past Chair. He completed 24 years of volunteer judicial service as a Judge Pro Tem of the San Diego Superior Court. Since admission to the California Bar, Partner Our firm's recent pro bono victories include a settlement which prohibits the City of San Diego from targeting homeless people for illegal lodging tickets under Penal Code Section 467(j). (*Spencer v. City of San Diego*, USDC Case No 04CV-2314 BEN (WMC).) The *Spencer* settlement had the effect of increasing the number of available shelter beds in San Diego.

8. Cohelan Khoury & Singer has been certified Class Counsel in the following contested proceedings: *Aguilar v. Atlantic Richfield, et al.*, San Diego County Superior Court Case No. 00700810; *Andino v. Kaiser Foundation Hospitals*, Alameda County Superior Court Case No. RG11580548; *Arellano, et al. v. Container Connection of Southern California, Inc.*, Los Angeles County Superior Court Case No. BC500675; *BANK OF AMERICA WAGE AND HOUR EMPLOYMENT PRACTICES LITIGATION*, United States District Court, District of Kansas MDL Case No. 2138 (FLSA Condition Certification); *Czuchaj v. Conair Corporation*, United States District Court, Southern District of California Case No. 13CV1901; *Dilts, et al. v. Penske Logistics, L.L.C., et al.*, United States District Court, Southern District of California Case No. 08CV0318; *Englert, et al. v. AT&T Wireless Services, Inc., et al.*, Circuit Court of the Second Circuit, State of Hawaii Case No. 02-1-0074; *Evans v. Washington Mutual Bank*, Orange County Superior Court Case No. 02CC15415; *Filion v. Ethan Allen Retail Inc.*, United States District Court, Southern District of California Case No. 05CV2340; *Gerard v. Les Schwab Tire Centers of California, Inc.*, Sacramento County Superior Court Case No. 2007-30000003; *Grana, et al. v. PICO Enterprises, Inc. dba Phyle Inventory Control Specialist and*

PICS L.A.S.C. Case No. BC472891; *Gutierrez v. Save Mart Supermarkets* San Mateo Superior  
Case No. CIV530955; *Wilcox v Albertsons*, San Diego County Superior Court Case No.  
GIC833922; *Gonzalez, et al. v. Freedom Communications, Inc. d/b/a The Orange County*  
*Register*, Orange County Superior Court Case No. 03CC08756; *Graham, et al. v. Overland*  
*Solutions, Inc.*, United States District Court, Southern District of California Case No.  
10CV0672 (FLSA Conditional Certification); *Hicks v. Kaufman and Broad Home Corp.*, Los  
Angeles County Superior Court Case No. B198414; *Hohnbaum, et al. v. Brinker Restaurant*  
*Corporation, et al.*, San Diego County Superior Court Case No. GIC834348; *KEMP, et al. v.*  
*CSEA, et al.*, Circuit Court of the First Circuit, State of Hawaii Case No. 98-3815-08; *LIBERTY*  
*MUTUAL OVERTIME CASES*, Los Angeles County Superior Court Case No. JCCP 4234;  
*Mitchell, et al. v. Acosta, Inc., dba Acosta Sales and Marketing Company*, United States District  
Court, Central District of California Case No.11CV07196 (FLSA Conditional Certification);  
*Santana v. Rady Children's Hospital-San Diego*, San Diego County Superior Court Case No.  
37-2014-00022411; *Schaffer v. Rady Children's Hospital-San Diego*, San Diego County  
Superior Court Case No. 337-2015-00022978; *Schneider, et al. v. Catholic Healthcare West*,  
San Francisco County Superior Court Case No. CGC-10-506243; *Salucci v. Amada Senior*  
*Care, Inc.*, Orange County Superior Court Case No. 37-2015-00778081; *Smith v. California*  
*Pizza Kitchen*, San Diego County Superior Court Case No. 37-2008-00083992; *STEROID*  
*HORMONE PRODUCT CASES*, Los Angeles County Superior Court Case No. JCCP 4363;  
*Stevenson Aibangbee v. Victoria Apartments, et al.*, Los Angeles County Superior Court Case  
No. BC299498; *Swift v. Liebert Corp.*, Orange County Superior Court Case No. 00CC04588;  
*Sylvia, et al. v. Wells Fargo Home Mortgage, Inc.*, Orange County Superior Court Case No.  
03CC05747; *Vaquero v. Ashley Furniture Industries, Inc., et al.*, United States District Court,  
Central District of California Case No. 12CV8590; *Vaquero v. Stoneledge Furniture LLC*, Los  
Angeles County Superior Court Case No. BC522676; *Vazquez v. Kraft Heinz Foods Company*,  
United States District Court, Southern District of California Case No. 16-CV-02749; *Watson v.*  
*Raytheon Company*, United States District Court, Southern District of California Case No.  
10CV0634; and *Weigle v. FedEx Ground Package System, Inc.*, United States District Court,

Southern District of California Case No. 06CV1330, among others, as well as being appointed Class Counsel in connection with well over 200 class action settlements.

9. As Class and PAGA Representative Counsel, Cohelan Khoury & Singer has actively commenced, prosecuted and concluded numerous state and federal class and representative actions. Since 2016, Cohelan Khoury & Singer has played a central role in the resolution of over 200 such cases, including the following, which have received court approval:

(a) *Arellano, et al. v. Container Connection of Southern California, Inc.*, Los Angeles County Superior Court, Case No. BC500675, Hon. Anne I. Jones; (b) *Castro v. Home Depot U.S.A., Inc.*, Los Angeles County Superior Court, Case No. BC577885, Hon. Elihu M. Berle; (c) *Czuchaj v. Conair Corporation*, United States District Court, Southern District of California, Case No. 13-CV-1901 BEN, Hon. Roger T. Benitez; (d) *Gardiner v. TSYs*, United States District Court, Central District of California, Case No. 18-cv-00415, Hon. David O. Carter; (e) *Grana v. PICO Enterprises, Inc.*, Los Angeles County Superior Court, Case No. BC472891, Hon. Stephanie M. Bowick; (f) *Gutierrez v. Save Mart Supermarkets*, San Mateo County Superior Court, Case No. CIV530955, Hon. Marie S. Weiner; (g) *Hernandez v. Workforce Enterprises WFE, Inc.*, Los Angeles County Superior Court Case No. BC590913, Hon. Elihu M. Berle; (h) *Hicks v. Poway Academy of Hair Design, Inc.*, San Diego County Superior Court, Case No. 2014-00026517, Hon. Ronald L. Styn; (i) *Hubbard v. Caliber Home Loans, Inc.*, Orange County Superior Court, Case No. 2018-01017838; (j) *Klein v. Loomis Armored US, LLC*, San Bernardino County Superior Court, Case No. CIVDS1704547, Hon. David Cohn; (k) *Laureano v. The Art of Shaving*, Los Angeles County Superior Court, Case No. BC550093, Hon. Amy D. Hogue; (l) *Lopez, et al. v. Management & Training Corporation, et al.*, United States District Court, Southern District of California, Case No. 17-CV-010624 JM, Hon. Jeffrey T. Miller; (m) *Magdaleno v. Shelly Automotive, LLC*, Orange County Superior Court Case No. 2013-0043958, Hon. Kim. G. Dunning; (n) *McGrath, et al. v. Wyndham Resort Development Corporation, et al.*, United States District Court, Southern District of California, Case. No. 15-CV-1631 JM, Hon. Jeffrey T. Miller; (o) *Mena v. Wolfgang Puck Catering*, Los Angeles County Superior Court Case No. BC582743, Hon. John Shepard Wiley, Jr.; (p) *Morales v. The*

1 *Los Angeles Country Club*, Los Angeles County Superior Court, Case No. BC566493, Hon.  
2 William F. Highberger; (q) *Nijmeh v. Bon Appetit Management Company, Inc.*, Santa Clara  
3 County Superior Court, Case No. 16CV294127, Hon. Thomas E. Kuhnle; (r) *Plascencia v.*  
4 *Aramark Services, Inc.*, Santa Clara County Superior Court, Case No. 2015-1-CV-288310, Hon.  
5 Brian C. Walsh; (s) *Plimpton v. Gordon Trucking, Inc.*, San Bernardino County Superior Court,  
6 Case No. CIV-DS-1511918, Hon. Donald Alvarez; (t) *Raya v. Amazon*, USDC, Northern  
7 District of California, Case No. 15-CV-02005 MMC, Hon. Maxine M. Chesney; (u) *Rivas v.*  
8 *ESA Management*, USDC, Central District of California, Case No. 14-CV-5767, Hon. Dale S.  
9 Fischer; (v) *Rodriguez v Healthcare Partner Medical Group, Inc.*, Los Angeles County  
10 Superior Court, Case No. BC541313, Hon. Kenneth Freeman; (w) *Ryan v. Dignity Health*,  
11 Sacramento County Superior Court Case No. 2013-00147371, Honorable Alan G. Perkins; (x)  
12 *Santana v. Rady Children's Hospital-San Diego*, San Diego County Superior Court Case No.  
13 37-2014-00022411, Hon. Joel R. Wohlfeil; (y) *Schaffer v. Rady Children's Hospital-San Diego*,  
14 San Diego County Superior Court Case No. 337-2015-00022978; Hon. Joel R. Wohlfeil; (z)  
15 *Schneider v. Catholic Healthcare West*, San Francisco County Superior Court, Case No. CGC-  
16 10-506243, Hon. Angela Bradstreet; (aa) *Schwartz v Bank of the West*, San Francisco County  
17 Superior Court, Case No. CGC-14-538955, Hon. Harold E. Kahn; (bb) *Syed v. M.I. Swaco*,  
18 USDC, Eastern District of California, Case No. 12-CV-01718 DAD, Hon. Dale A. Drozd; (cc)  
19 *Vaquero, et al. v. Stoneledge Furniture, LLC*, Los Angeles County Superior Court Case No.  
20 BC522676, Hon. Elihu M. Berle; (dd) *Vazquez v. Kraft Heinz Foods Company*, USDC,  
21 Southern District of California Case No. 16-CV-02749, Hon. William Q. Hayes; (ee) *Walsh v.*  
22 *Cedars-Sinai Medical Center*, Los Angeles County Superior Court Case No. BC487290, Hon.  
23 William F. Highberger; among others.

24       10. Plaintiffs seek final approval of a \$350,500 non-reversionary wage and hour  
25 class and Private Attorney Generals' Act ("PAGA") settlement for 602 non-exempt California  
26 employees of Defendant GE United Technologies, LLC d/b/a Grassdoor, any time from July 19,  
27 2019 through July 13, 2021. At the time of Preliminary Approval, Plaintiff estimated the Class  
28 to be 606 members, based on Defendant's representation that there were 562 drivers and 44

1 nondrivers employed during the Class Period. The final class list consists of 602 members who  
2 are encompassed within the Class definition.

3 11. Support for the Settlement is strong. No Class Member objected to the  
4 Settlement and only five class members requested exclusion, less than 1% (0.8) of the total  
5 class. Participating Class Members will receive payments averaging \$328.62, with a highest  
6 payment of \$1,144.99, and PAGA Members will receive payments averaging \$2.08, with a  
7 highest payment of \$6.70, upon Final Approval.

8 12. GE United Technologies, LLC dba Grassdoor delivers cannabis products  
9 throughout Los Angeles and Orange Counties. According to its website, as of the date of  
10 preliminary approval motion filing: “Grassdoor is a cannabis delivery technology company that  
11 has developed a platform to help retailers efficiently manage and deliver orders for cannabis  
12 products to their customers and patients.” <https://grassdoor.com/becomedriver>. Grassdoor began  
13 employing non-exempt employees, including delivery drivers on July 19, 2019.

14 13. Plaintiff Luis Lopez worked for Grassdoor as a non-exempt delivery driver,  
15 delivering cannabis products throughout Los Angeles County from October 2019 through June  
16 2020.

17 14. The Class is defined as all hourly, non-exempt individuals employed by GE  
18 United Technologies, LLC dba Grassdoor in California during the period from July 19, 2019  
19 through July 13, 2021 (“Class Period”). There are 597 class members who worked 17,648 pay  
20 periods during the Class Period.

21 15. PAGA Members means all Class Members employed during the time during the  
22 time period of September 11, 2019 through July 13, 2021 (“PAGA Period”). The 602 PAGA  
23 Members worked a combined 17,713 pay periods during the PAGA Period.

24 16. On September 11, 2020, Plaintiff filed a class action complaint in the Los  
25 Angeles County Superior Court alleging Grassdoor’s failure to (1) pay minimum, regular, and  
26 overtime wages (Labor Code §§ 510, 1194; IWC Wage Order 9-2001, §§ 3, 4); (2) provide  
27 meal periods (Labor Code §§ 226.7, 512; IWC Wage Order 9-2001, §11); (3) reimburse  
28 business expenses (Labor Code §§ 2800, 2802, 2804); (4) provide accurate itemized wage

1 statements (Labor Code § 226); and (5) timely pay wages due upon separation of employment  
2 (Labor Code §§ 201, 202, 203). Based on these allegations, Plaintiff alleged unfair business  
3 practices in violation of the Unfair Competition Law (Bus. & Prof. Code §§ 17200-17208).

4 17. In early January 2021, the Parties agreed to mediate and scheduled mediation  
5 with Todd A. Smith for April 14, 2021.

6 18. On January 29, 2021, Plaintiff filed a First Amended Complaint (“FAC”)  
7 seeking PAGA civil penalties pursuant to Labor Code §§ 2699, *et seq.*, based on Plaintiff’s  
8 causes of action, and sought penalties for Grassdoor’s unlawful deduction of tips (Labor Code §  
9 351) and failure to maintain accurate records (Labor Code § 1174).

10 19. To prepare for mediation, Plaintiff requested, and Defendant produced, subject to  
11 a Stipulated Protective Order, key data for the period from July 19, 2019 through November 12,  
12 2020 that included: (1) total number of Class Members; (2) number of formerly employed Class  
13 Members; (3) number of Class Member Pay Periods; (4) number of Class Member Work  
14 Weeks; and (5) average hourly rate of pay; and for the PAGA Penalties for the period from  
15 September 11, 2019 to November 12, 2020: (1) total number of aggrieved employees, (“PAGA  
16 Members”); (2) number of formerly employed PAGA Members; (3) number of PAGA Member  
17 Pay Periods; (4) number of PAGA Member Work Weeks; and (5) average hourly rate of pay.  
18 In addition, Grassdoor produced excel spreadsheet data containing a 10% random sample of  
19 Class Member time (through November 12, 2020) and payroll records (through Pay Period  
20 ending September 27, 2020), and the names and contact information for ten Class Members.

21 20. After receipt of the data and an analysis of the information produced by  
22 Grassdoor and gathered from informal interviews of Class Members, Plaintiff’s Counsel  
23 retained the services of a damages’ consultant to review the information and data to assess  
24 violation rates for short, late, or missed meal periods, unpaid or underpaid expense  
25 reimbursements for mileage and cell phone expenses, the incidence of underpaid overtime  
26 wages due to failure to use the Class Members’ regular rate of pay, and derivative claims for  
27 wage statements penalties, waiting time penalties, PAGA civil penalties, and to extrapolate the  
28 damages to the Class.

1           21.     On April 14, 2021, the Parties attended mediation via Zoom with Todd A. Smith,  
2 an experienced and respected wage and hour mediator. The Parties engaged in a day of serious,  
3 informed and lengthy arms'-length negotiations, which resulted in a Settlement in principle and  
4 a memorandum of understanding.

5           22.     Several months after mediation and after drafting the long-form settlement  
6 agreement, Counsel for Grassdoor proposed a release of rest period claims. To evaluate the  
7 request, Plaintiff reenlisted his damages' consultant to analyze the data previously produced  
8 which had included data documenting clock-in and clock-out times for rest periods. The rest  
9 period violation rate was identified, and extrapolated to the Class. Based on the identified  
10 violation rate, and after an exchange of written demands and counter-offers between the Parties,  
11 on January 26, 2022, an agreement was reached on a fair negotiated sum to release the rest  
12 period claims on behalf of the Class reflected in the discussion below.

13           23.     To effectuate the terms of the proposed Settlement, which now includes a release  
14 of rest period claims, on April 5, 2022 a Second Amended Class and Representative Action  
15 Complaint was filed.

16           24.     The Parties agreed, subject to Court approval, the Action may be settled for the  
17 Gross Settlement Amount of \$350,500.00 ("GSA") which, subject to Court approval, includes:  
18 (a) attorneys' fees of \$116,833.33 (one-third of the GSA) to compensate Class Counsel for work  
19 performed and remaining to be performed in securing final Court approval; (b) Class Counsel's  
20 litigation expenses of \$14,483.55 (originally estimated at \$15,000.00); (c) a Service Payment to  
21 Plaintiff Luis Lopez of \$5,000.00 in consideration of his initiation and prosecution of the action,  
22 service as Class Representative, work performed, and risks undertaken for the payment of costs  
23 in the event the case was unsuccessful, and benefits conferred on absent Class Members;  
24 (d) PAGA Payment of \$5,000.00 of which \$3,750.00 (75% of \$5,000.00) will be paid to the  
25 LWDA, and \$1,250.00 (25% of \$5,000.00) will be distributed to PAGA Members); and (e)  
26 Administration expenses to Simpluris of up to \$13,000.00. In addition to the GSA, Defendant  
27 will pay the Employer Tax Obligations.

28 ///

25. Plaintiff consented to apportion attorneys' fees: 60% to Cohelan, Khoury & Singer, and 40% to Mesriani Law Group.

26. After all Court-approved deductions from the GSA, the remaining Net Settlement Amount ("NSA") estimated at \$197,433.12 will be distributed to Participating Class Members based on number of Pay Periods worked at any time during Class Period without the need to return a claim form.

27. The \$1,250.00 PAGA Payment will be distributed to PAGA Members based on number of Pay Periods worked at any time during the PAGA Period.

28. The 597 Participating Class Members, who worked a total of 17,648 pay periods during the Class Period, will receive an estimated average gross payment of \$328.62, the estimated highest gross payment being \$1,144.99, with the lowest being \$11.12. The 602 PAGA Members, who worked a total of 17,713 pay periods during the PAGA Period, will receive an average PAGA payment of \$2.08, the highest PAGA payment of \$6.70, and the lowest PAGA payment being \$0.07.

29. Plaintiff's estimated individual settlement amount is \$402.73.

30. Checks will be void 180 days after issuance, and any unclaimed amounts will be transferred to the State of California Unclaimed Property Fund, to be held in the name of and for the benefit of such Class Members under California's escheatment laws.

31. On May 24, 2022, the Court preliminarily approved the proposed Settlement and Notice Packet for mailing to the Class, on the condition that at the time of filing for final approval, the Parties submit a written Amendment to the Settlement Agreement stating that the PAGA release date is the same as the class settlement release date. Section 12.2 of the Joint Stipulation of Settlement and Release of Class Action has been revised accordingly. Attached as Exhibit 1 is a true and correct copy of the Amendment to Joint Stipulation of Settlement and Release of Class Action.

32. On July 27, 2022, after searching the National Change of Address database, and updating Class Member addresses, the Settlement Administrator mailed Notice Packets to 602 Class Members. The Notice Packet informed them of (1) the pendency of the Action; (2)

1 proposed settlement terms; (3) automatic payment of Settlement shares if exclusion not  
2 requested; (4) estimated amount each Participating Settlement Class Members will receive  
3 based on number of pay periods worked during the Class and PAGA Period; (5) released  
4 claims; (6) right to object or request exclusion, and (7) date, time and place of the final approval  
5 hearing.

6 33. The Class response to the Settlement was extremely favorable. No objections and  
7 five (5) requests for exclusion were received.

8 34. Nothing has changed since the Court granted Preliminary Approval of the  
9 Settlement to negate the presumption of fairness. Class Counsel remains convinced the  
10 Settlement is in the Class' best interest.

11 35. Class Counsel requests attorneys' fees of \$116,833.33, one-third of the GSA, and  
12 actual litigation costs of \$14,483.55. To bring this matter to final approval, Class Counsel will  
13 have expended 240.8 hours, a lodestar of \$146,242.00. Exhibit 2 is a true and correct copy of  
14 the Consolidated Summary of Class Counsel's Hours and Costs; Exhibit 3(A-E) is a true and  
15 correct copy of Cohelan Khoury & Singer's Time Records for each attorney that worked on this  
16 case; Exhibit 4, a true and correct copy of Class Counsel's Itemization of Costs.

17 36. Class Counsel's request for one-third of the common fund is in the mid-range of  
18 fee awards which commonly range from 20% to 50%, and fair compensation for undertaking  
19 complex, risky, time-consuming litigation on a contingent basis for three years, and for the  
20 results achieved. Many California state and federal courts routinely approve fee requests equal  
21 to or greater than sought here.

22 **California cases:** *Estrada, Alvarez vs. Burrtec Waste Group, Inc., et al.*, San Diego  
23 Super. Ct., Case No. 37-2011-00096268-CU-OE-CTL (Hon. Joel M. Pressman – approving  
24 attorneys' fees of 33-1/3% of \$2,789,000 in a pre-certification meal violation class action);  
25 *White v. Edco Disposal Corp., et al.*, San Diego Super. Ct., Case No. 37-2011-00088803-CU-  
26 OE-CTL (Hon. Judith Hayes – approving attorneys' fees of 33-1/3% of \$3,500,000 in a pre-  
27 certification meal violation class action); *Parker v. City of L.A.*, 44 Cal. App. 3d 556, 567-68  
28 (1974) (33.3%); *Tokar v. GEICO*, No. GIC 810166 (San Diego County Super. Ct. July 9, 2004)

(approving award of attorney's fees of 33-1/3% of recovery in a wage and hour class action); *Marroquin v. Bed Bath & Beyond*, No. RG04145918 (Alameda County Super. Ct. June 22, 2004) (in a wage and hour class action, 33.3%); *Crandall v. U-Haul Int'l, Inc.*, No. BC178775 (Los Angeles County Super. Ct. Aug. 17, 2001) (in a wage and hour class action, 40%); *Davis v. The Money Store, Inc.*, No. 99AS01716 (Sacramento County Super. Ct. Dec. 26, 2000) (in a wage and hour class action, awarding 33.3% of \$6,000,000 settlement); *Kenemixay v. Nordstrom, Inc.*, (L.A. County Super. Ct., No. BC318850) (50% award); *Albrecht v. Rite Aid Corp.*, No. 729219 (San Diego County Super. Ct.) (35% award).

**Federal cases:** *Wren v. RGIS Inventory Specialists*, No. C-06-05778 JCS, 2011 WL 1230826, at \*28 (N.D. Cal. April 1, 2011) (approving fee that amounted to 42% of common fund in wage and hour class action); *Vasquez v. Coast Valley Roofing*, 266 F.R.D. 482, 491-93 (wage-and-hour action putative class-action settlement where court approved award of attorneys' fees in the amount of 33.3% of the common fund); *In re Ampicillin Antitrust Litig.*, 526 F. Supp. 494 (D.D.C. 1981) (45%); *Beech Cinema, Inc. v. Twentieth-Century Fox Film Corp.*, 480 F. Supp. 1195 (S.D.N.Y. 1979), *aff'd*, 622 F.2d 1106 (2d Cir. 1980) (in a Sherman Act case, approximately 53%); *In re Heritage Bond*, 2005 WL 1594389, at \*20 (C.D. Cal. June 10, 2005) (award of attorneys' fees of one-third of \$27,783,000-the Settlement Fund is fair and reasonable); *Fernandez v. Victoria Secret Stores, LLC*, No. CV 06-04149 MMM (SHx), 2008 WL 8150856, at \*16 (C.D. Cal. July 21, 2008) (awarding 34% in fees of common fund); *Martin v. FedEx Ground Package Sys., Inc.*, No. C06-6883 VRW, 2008 WL 5478576, at \*8 (N.D. Cal. Dec. 31, 2008) (truck driver meal break class action where the court approved attorneys' fees of 1/3 of common fund); *Singer v. Becton Dickinson & Co.*, No. 08-CV-821-IEG (BLM), 2010 WL 2196104, at \*8 (S.D. Cal. Jun. 1, 2010) (noting 33.33% of common fund for a wage and hour class action settlement "falls within the typical range of 20% to 50% awarded in similar cases").

37. Within the past several years, Cohelan Khoury & Singer has been awarded one-third of a common fund, in the following class and representative action settlements:

///

1 a) *Luareno v. The Art of Shaving*, Los Angeles County Superior Court, Case No.  
BC550093 (Hon. Amy D. Hogue – approving attorneys’ fees of 33-1/3% of \$950,000  
2 Settlement in a pre-certification wage and hour class action);

3 b) *Ramirez v. Kirkhill-TA CO.*, Los Angeles County Superior Court, Case No.  
BC557207 (Hon. Kenneth Freeman – approving attorneys’ fees of 33-1/3% of \$1,100,000  
4 Settlement in a pre-certification wage and hour class action);

5 c) *Gutierrez v. Benchmark*, San Diego County Superior Court, Case No. 2014-  
00032287 (Hon. Joel M. Pressman – approving attorneys’ fees of 33-1/3% of \$350,000  
6 Settlement in a pre-certification wage and hour class action);

7 d) *Morales v. The Los Angeles Country Club*, Los Angeles County Superior Court,  
Case No. BC566493 (Hon. William F. Highberger – approving attorneys’ fees of 33-1/3% of  
8 \$600,000 settlement in a pre-certification wage and hour class action);

9 e) *Rodriguez v. Healthcare Partner Medical Group, Inc.*, Los Angeles County  
Superior Court, Case No. BC541313 (Hon. Kenneth Freeman – approving attorneys’ fees of 33-  
10 1/3% of \$6,000,000 settlement in a pre-certification wage and hour class action);

11 f) *Smith v. Unionbancal Corp.*, San Francisco County Superior Court, Case No.  
CGC-11-508019 (Hon. Harold E. Kahn – approving attorneys’ fees of 33-1/3% of \$1,450,000  
12 settlement in a pre-certification wage and hour class action);

13 g) *Walsh v. Cedars-Sinai Medical Center*, Los Angeles County Superior Court,  
Case No. BC487290 (Hon. William F. Highberger – approving attorneys’ fees of 33-1/3% of  
14 \$500,000 settlement in a pre-certification wage and hour class action);

15 h) *Plimpton v. Gordon Trucking, Inc.*, San Bernardino County Superior Court, Case  
No. CIV-DS-1511918 (Hon. Donald Alvarez – approving attorneys’ fees of 33-1/3% of  
16 \$3,750,000 settlement in a pre-certification wage and hour class action);

17 i) *Mena v. Wolfgang Puck Catering*, Los Angeles County Superior Court, Case No.  
BC582743 (Hon. John Shepard Wiley, Jr. – approving attorneys’ fees of 33-1/3% of \$600,000  
18 settlement in a pre-certification wage and hour class action);

19 j) *Syed v. M.I. Swaco*, USDC Eastern District of California, Case No. 12-CV-  
01718 DAD (Hon. Dale A. Drozd – approving fees of 33-1/3% of \$7,000,000 settlement in a  
20 pre-certification wage and hour class action);

21 k) *Magdaleno v. Shelly Automotive, LLC*, Orange County Superior Court, Case No.  
2013-0043958 (Hon. Kim. G. Dunning – approving attorneys’ fees of 33-1/3% of \$900,000  
22 settlement in a pre-certification wage and hour class action);

23 l) *Grana v. PICO Enterprises, Inc.*, Los Angeles County Superior Court, Case No.  
BC472891 (Hon. Stephanie M. Bowick – approving attorneys’ fees of 33-1/3% of \$1,500,000  
24 settlement in a certified wage and hour class action);

25 m) *McGrath v. Wyndham*, USDC Southern District of California, Case No. 15-CV-  
1631 JM (Hon. Jeffrey T. Miller – approving attorneys’ fees of 33-1/3% of \$7,250,000  
26 settlement in a pre-certification wage and hour class action)

27 n) *Arellano v. Container Connection*, Los Angeles County Superior Court, Case  
No. BC500675 (Hon. Ann I. Jones – approving attorneys’ fees of 33-1/3% of \$1,625,000  
28 settlement in a certified wage and hour class action);

1 o) *Nijmeh v. Bon Appetit*, Santa Clara County Superior Court, Case No.  
16CV294127 (Hon. Thomas E. Kuhnle – approving attorneys’ fees of 33-1/3% of \$1,350,000  
2 settlement in a pre-certification wage and hour class action);

3 p) *Vaquero v. Stoneledge*, Los Angeles County Superior Court, Case No.  
BC522676 (Hon. Elihu M. Berle – approving attorneys’ fees of 33-1/3% of \$3,900,000  
4 settlement in a certified wage and hour class action);

5 q) *Gutierrez v. Save Mart Supermarkets*, San Mateo County Superior Court, Case  
No CIV530955 (Hon. Marie S. Weiner – approving attorneys’ fees of 33-1/3% of \$5,000,000  
6 settlement in a certified wage and hour class action);

7 r) *Hernandez v. Workforce Enterprises WFE, Inc.*, Los Angeles County Superior  
Court, Case No. BC590913 (Hon. Elihu M. Berle – approving attorneys’ fees of 33-1/3% of  
8 \$778,000 settlement in a pre-certification wage and hour class action);

9 s) *Ramos v. Home Depot U.S.A., Inc.*, Alameda County Superior Court, Case No.  
RG15797737 (Hon. Da Ioana Petrou – approving attorneys’ fees of 33-1/3% of \$2,600,000  
10 settlement in a PAGA action);

11 t) *Klein v. Loomis*, San Bernardino County Superior Court, Case No.  
CIVDS1704547 (Hon. David Cohn – approving attorneys’ fees of 33-1/3% of \$1,014,000  
12 settlement in a pre-certification wage and hour class action).

13 u) *Gutierrez v. Southern Counties Oil*, San Diego County Superior Court, Case No.  
2017-00040850 (Hon. Ronald F. Frazier – approving attorneys’ fees of 33-1/3% of \$637,500  
14 settlement in a pre-certification wage and hour class action).

15 v) *Lawson v. Staples*, Los Angeles County Superior Court, Case No. BC542237  
(Hon. Kenneth R. Freeman – approving attorneys’ fees of 33-1/3% of \$58,275 settlement in a  
16 pre-certification wage and hour class action).

17 w) *Hanson v. Leisure Sports, Inc.*, Contra Costa County Superior Court, Case No.  
MSC17-00078 (Hon. Edward G. Weil – approving attorneys’ fees of 33-1/3% of \$200,000  
18 settlement in a pre-certification wage and hour class action).

19 x) *Horton v. Neostrata Company Inc., et al.*, USDC Southern District of California,  
Case No. 16-CV-2189 JLB (Hon. Anthony J. Battaglia – approving attorneys’ fees of 33-1/3%  
20 of \$355,000 settlement in a pre-certification wage and hour class action).

21 y) *Schaffer v. Rady Children’s Hospital – San Diego, et al.*, San Diego County  
Superior Court, Case No. 2015-00022978 (Hon. Joel R. Wohlfeil – approving attorneys’ fees of  
22 33-1/3% of \$12,500,000 settlement in a certified wage and hour class action).

23 z) *Hubbard v. Caliber Home Loans, Inc.*, Orange County Superior Court, Case No.  
2018-01017838 (Hon. Glenda Sanders – approving attorneys’ fees of 33-1/3% of \$175,000  
24 settlement in a PAGA action).

25 aa) *Redin v. Accountabilities Professional Group, Et al.*, Orange County Superior  
Court, Case No. 2017-00929734 (Hon. Glenda Sanders –attorneys’ fees of 33-1/3% of \$255,000  
26 settlement in Class action).

27 bb) *White v. Sacramento Regional Transit District*, Sacramento County Superior  
Court, Case No. 234-2018-00240461 (Hon. David D. Alba –attorneys’ fees of 33-1/3% of  
28 \$385,000 settlement in Class action).

cc) *Burris v. Resort Vacations, Inc.*, Orange County Superior Court, Case No. 30-2018-00997260 (Hon. Randall J. Sherman –attorneys’ fees of 33-1/3% of \$1,485,000 settlement in Class action).

dd) *Jimenez v. Reyes Holdings, LLC, et al.*, San Diego County Superior Court, Case No. 37-2019-00051577 (Hon. Joel R. Wohfeil –attorneys’ fees of 33-1/3% of \$216,666 settlement in Class and Representative action).

ee) *Santos, et al. v. National General Management Corp.*, San Bernardino County Superior Court, Case No. CIVDS 1918865 (Hon. David Cohn –attorneys’ fees of 33-1/3% of \$680,000 settlement in PAGA action).

ff) *Loreto v. General Dynamics Information Technology, Inc.*, USDC Southern District of California, Case No. 3:19-cv-01366-GPC-MSB (Hon. Gonzalo P. Curiel – approving attorneys’ fees of 33-1/3% of \$900,000 settlement in a pre-certification wage and hour class action).

gg) *Romanov v. Amazon Services LLC.*, USDC Central District of California, Case No. 2:20-cv-02692-SB-KS (Hon. Stanley Blumenfeld, Jr. – approving attorneys’ fees of 33-1/3% of \$700,000 settlement in a pre-certification wage and hour class action).

hh) *Olson v. Wrike, Inc.*, Santa Clara County Superior Court, Case No. 20CV366599 (Hon. Patricia M. Lucas – approving attorneys’ fees of 33-1/3% of \$2,000,000 settlement in a pre-certification wage and hour class action).

ii) *Gutierrez v. Kite Electric Incorporated*, Orange County Superior Court, Case No. 30-2020-01133960 (Hon. Peter J. Wilson – approving attorneys’ fees of 33-1/3% of \$458,991 settlement in a pre-certification wage and hour class action).

38. If this were a non-representative litigation, the customary fee arrangement would be a contingent percentage basis in the range of one-third to 40% of recovery. Class Counsel’s fee request is in line with, if not lower than, awards in similar cases. This also supports the request.

39. Unlike Defense counsel, who are regularly paid a fair-market hourly rate, Class Counsel received no compensation for over three years, and no reimbursement of expenses. The contingent representation, and risks of the litigation, fully warrant approval of the fee request.

40. Class Counsel’s lodestar is \$146,242.00, \$20,591.33 greater than the \$116,833.33 fee award sought. If the fee award were calculated using the lodestar, rather than the common fund method, no multiplier would be needed. Class Counsel’s work to obtain a class settlement was reasonable and necessary and is reflected in the excellent result achieved for Class Members.

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41. Class Counsel's skill and experience support their hourly rates and are in line with rates typically approved in California wage and hour class action litigation.

42. Cohelan Khoury & Singer's practice is limited exclusively to litigating class and representative actions on behalf of employees and consumers. Cohelan, Khoury & Singer has been appointed Class Counsel or co-Class Counsel in over 250 such cases.

43. As leading attorneys in the field, Class Counsel monitors prevailing market rates of defense and plaintiff firms and sets billing rates to follow attorneys and staff of comparable skill, qualifications and experience, which support their hourly rates ranging from \$900 to \$350 (Cohelan Khoury & Singer: Founding Partner, Timothy C. Cohelan - \$900; Founding Partner, Isam C. Khoury - \$900; Managing Partner, Michael D. Singer - \$900; Partner, Diana M. Khoury - \$750; Associate, Rosemary C. Khoury - \$350. Mesriani Law Group: Managing Attorney, Rodney Mesriani - \$595). These rates are in line with those typically approved in wage-and-hour class action litigation in California. Other Class and Representative Counsel before California courts charge comparable if not higher rates. Attached as Exhibit 5 is a true and correct copy of the National Law Journal survey of hourly billing rates for Partners and Associates for 2014.

44. Cohelan Khoury & Singer attorneys working on this case have recently been approved at their requested rates in the Superior Courts for the Counties of Alameda (*Bandril/Reyes v. Plastikon Industries*, Case No. RG19038227), Los Angeles (*Torres v. Mercury Plastics, Inc.*, Case No. BC723631), Orange (*Crandall, et al. v. Maxim Healthcare Services, Inc.*, Case No. 2017-00940239; *Gutierrez v. Kite Electric Incorporated*, Case No. 2020-01133960), San Diego (*Babouchian, et al. v. Soleil Communications, Inc., et al.*, Case No. 2017-00044756; *Phillips, et al. v. So-Cal Dominoids, et al.*, Case No. 2013-00056664; *Ramirez v Town Park, LLC*, Case No. 2020-00003942), and Santa Clara (*Kebede, et al. v. Wrike, Inc.*, Case No. 20CV366599).

45. The Settlement allows for Class Counsel to request up to \$15,000.00 in costs. Counsel seeks reimbursement of actual costs of \$14,483.55. These costs were reasonable and necessary.

1           46.     The settlement of PAGA penalties for \$5,000, of which \$3,7500 (75%) will be  
2 paid to the LWDA and \$2,500 (25%) to aggrieved employees, is reasonable and appropriate.  
3 The Parties negotiated a good faith amount for PAGA penalties, which was not the result of  
4 self-interest at the expense of Class Members. The LWDA was served the Motion for  
5 Preliminary Approval and the Settlement Agreement and raised no objection. Attached as  
6 Exhibit 6 is a true and correct copy of the LWDA Confirmation of Receipt dated March 25,  
7 2022.

8           47.     The Class received notice Plaintiff would request \$5,000.00 for “initiation and  
9 prosecution of the Action, risks undertaken for payment of costs, and the benefits conferred  
10 upon the Class.” No Class Member objected.

11           48.     On the same date this motion and its exhibits are filed with the Court, they will  
12 be served on Defendant and provided to the LWDA via its website, using the appropriate intake  
13 form. Attached as Exhibit 7 is a true and correct copy of the LWDA confirmation of Receipt.

14           I declare under the penalty of perjury under the laws of the State of California the  
15 foregoing is true and correct and this declaration is executed September 30, 2022, in San Diego,  
16 California.

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Diana M. Khoury

# **EXHIBIT 1**

COHELAN KHOURY & SINGER  
 Michael D. Singer, (SBN 115301)  
 msinger@ckslaw.com  
 Diana M. Khoury (SBN 128643)  
 dkhoury@ckslaw.com  
 Rosemary C. Khoury, (SBN 331307)  
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MESRIANI LAW GROUP  
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 Santa Monica, CA 90401  
 Telephone: (310) 826-6300

Attorneys for Plaintiff LUIS LOPEZ, individually  
 and on behalf of all others similarly situated,

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 Irvine, CA 92612  
 Telephone: (949) 622-1661

Attorneys for Defendant  
 GE UNITED TECHNOLOGIES, LLC d/b/a GRASSDOOR

## SUPERIOR COURT OF THE STATE OF CALIFORNIA

### COUNTY OF LOS ANGELES

LUIS LOPEZ, individually and on behalf of all  
 others similarly situated,

Plaintiff,

vs.

GE UNITED TECHNOLOGIES, LLC, a  
 Delaware Limited Liability Company d/b/a  
 GRASSDOOR, and DOES 1 through 10,  
 Inclusive,

Defendants.

) Case No. 20STCV34691

) Assigned for All Purposes To:

) Judge: William F. Highberger

) Dept: SS-10

) **AMENDMENT TO JOINT STIPULATION**  
 ) **OF SETTLEMENT AND RELEASE OF**  
 ) **CLASS ACTION**

) Action Filed: September 11, 2020

**AMENDMENT TO JOINT STIPULATION OF SETTLEMENT AND RELEASE OF**  
**CLASS ACTION**

This Amendment to the Joint Stipulation of Settlement and Release of Class Action (“Amendment to Agreement”) is made and entered into between Plaintiff LUIS LOPEZ (“Plaintiff”), individually and on behalf of the Conditionally Certified Settlement Class, and Defendant GE UNITED TECHNOLOGIES, LLC dba GRASSDOOR (“Grassdoor” or “Defendant”) pursuant to paragraph 14.9 of the Joint Stipulation of Settlement and Release of Class Action filed with the Court on March 25, 2022 as Exhibit 1 to the Declaration of Diana M. Khoury in Support of Motion for Preliminary Approval of Class Action Settlement (the “Agreement”).

The Agreement is Amended in the following manner:

**12.2 Release by the LWDA, Plaintiff, and Aggrieved Employees**

Upon the Effective Date, the LWDA, Plaintiff, and the PAGA Members shall be deemed to have released the Released Parties of any and all claims, and/or causes of action under PAGA which are based upon the factual allegations set forth in the Complaint and arising at any time during the PAGA Period.

IN WITNESS WHEREOF, the Parties and their counsel have executed this Amendment Agreement on the date below their signatures of their representatives. The date of the Amendment to Agreement shall be the date of the latest signature.

**CDF LABOR LAW LLP**

September 30, 2022

By: 

David G. Hagopian

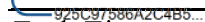
Garrett V. Jensen

Counsel for Defendant GE UNITED  
TECHNOLOGIES, LLC dba GRASSDOOR

**DEFENDANT**

September 30, 2022

By: 

  
Zack Ein, on behalf of Defendant GE UNITED  
TECHNOLOGIES, LLC dba GRASSDOOR

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**COHELAN KHOURY & SINGER  
MESRIANI LAW GROUP**

September 30, 2022

By:   
Diana M. Khoury  
Rosemary C. Khoury  
Rodney Mesriani  
Counsel for Plaintiff LUIS LOPEZ

**PLAINTIFF**

September 30, 2022

By:   
Plaintiff LUIS LOPEZ

# **EXHIBIT 2**

SUMMARY OF TIME AND COSTS  
*Lopez v. GE United Technologies, LLC d/b/a Grassdoor*  
L.A.S.C. Case No. 20STCV34691

**Total Hours:** 240.8  
**Total Lodestar Fees:** \$146,242.00  
**Total Costs:** \$ 14,483.55

| FIRM/<br>ATTORNEYS                        | YEAR<br>ADMITTED | HOURS        | HOURLY<br>RATE | TOTAL                |
|-------------------------------------------|------------------|--------------|----------------|----------------------|
| <b>COHELAN KHOURY &amp; SINGER</b>        |                  |              |                |                      |
| Timothy D. Cohelan, Founding Partner      | 1974             | 0.6          | \$900          | \$ 540.00            |
| Isam C. Khoury, Founding Partner          | 1974             | 37.6         | \$900          | \$ 33,840.00         |
| Michael D. Singer, Managing Partner       | 1984             | 8.9          | \$900          | \$ 8,010.00          |
| Diana M. Khoury, Partner                  | 1987             | 63.6         | \$750          | \$ 47,700.00         |
| Rosemary C. Khoury, Associate             | 2020             | 53.9         | \$350          | \$ 18,865.00         |
| Amber Worden, Certified Paralegal         | N/A              | 3.6          | \$200          | \$ 720.00            |
| Matthew Atlas, Paralegal                  | N/A              | 15.6         | \$170          | \$ 2,652.00          |
| <b>COHELAN KHOURY &amp; SINGER TOTAL:</b> |                  | <b>183.8</b> |                | <b>\$ 112,327.00</b> |

| FIRM/<br>ATTORNEYS                            | YEAR<br>ADMITTED | HOURS       | HOURLY<br>RATE | TOTAL               |
|-----------------------------------------------|------------------|-------------|----------------|---------------------|
| <b>MESRIANI LAW GROUP</b>                     |                  |             |                |                     |
| Rodney Mesriani                               | 1996             | 57.0        | \$595          | \$ 33,915.00        |
| <b>SHIMODA &amp; RODRIGUEZ LAW, PC TOTAL:</b> |                  | <b>57.0</b> |                | <b>\$ 33,915.00</b> |

|                                     |                                     |
|-------------------------------------|-------------------------------------|
| <b>Total Aggregate Hours: 240.8</b> | <b>Total Lodestar: \$146,242.00</b> |
|-------------------------------------|-------------------------------------|

| <b>LITIGATION EXPENSES</b> |                     |
|----------------------------|---------------------|
| Cohelan Khoury & Singer    | \$ 13,681.95        |
| Mesriani Law Group         | \$ 801.60           |
| <b>TOTAL COSTS</b>         | <b>\$ 14,483.55</b> |

# **EXHIBIT 3**

# **EXHIBIT 3-A**

**ATTORNEY TIME**

**TIMOTHY D. COHELAN**

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***

**L.A.S.C. Case No. 20STCV34691**

**Attorney Time – Timothy D. Cohelan**

| <b>Date</b> | <b>Activity</b>                                          | <b>Time</b> |
|-------------|----------------------------------------------------------|-------------|
| 10/29/2020  | Discuss CMC statement with RK                            | 0.2         |
| 11/30/2021  | Office meeting discussion of issues in mediation of case | 0.4         |
|             | <b>Total Time</b>                                        | <b>0.6</b>  |

# **EXHIBIT 3-B**

**ATTORNEY TIME**

**ISAM C. KHOURY**

**Lopez v. GE United Technologies, LLC d/b/a Grassdoor**  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Isam C. Khoury**

| <b>Date</b> | <b>Activity</b>                                                            | <b>Time</b> |
|-------------|----------------------------------------------------------------------------|-------------|
| 7/8/2020    | New case evaluation and discussion, research                               | 0.8         |
| 8/26/2020   | Read email w/ company info                                                 | 0.1         |
| 8/26/2020   | Brainstorm COAs                                                            | 0.4         |
| 8/27/2020   | Discuss Discovery Outline and liability analysis, Doc Review               | 1.2         |
| 8/27/2020   | Read email re: case                                                        | 0.1         |
| 9/2/2020    | Discuss case with RK                                                       | 0.2         |
| 9/8/2020    | Edit discovery drafts, discuss PMQ categories w/ RK                        | 0.5         |
| 9/10/2020   | Discuss strategy with RK                                                   | 0.2         |
| 9/15/2020   | Status update discuss claims                                               | 0.3         |
| 9/16/2020   | Discuss claims with RK                                                     | 0.2         |
| 9/20/2020   | Discuss call with defense and claims with RK                               | 0.7         |
| 9/21/2020   | Conf call w/ defense                                                       | 0.3         |
| 9/21/2020   | Recap call with RK                                                         | 0.1         |
| 9/22/2020   | Discuss mediation with RK                                                  | 0.1         |
| 9/22/2020   | Email re discussion w/ defense atty re mediation and co co-Counsel summary | 0.2         |
| 9/29/2020   | Discuss strategy with RK                                                   | 0.1         |
| 10/5/2020   | Status update on service and discovery issues/stay w/ R                    | 0.4         |
| 10/27/2020  | Status update and mediation data discussion w/ RK                          | 0.3         |
| 10/28/2020  | File review and CMC discussion and discovery plan                          | 0.3         |
| 10/29/2020  | W/ RK re: M&C and CMC statement' respond to proposed stipulation w/ RK     | 0.5         |
| 10/30/2020  | Work on mediation data request, email to RK                                | 0.4         |
| 11/2/2020   | Review remedies chart                                                      | 0.1         |
| 11/17/2020  | Discuss claims with RK                                                     | 0.2         |
| 11/17/2020  | Work on compliant PAGA /class                                              | 0.4         |
| 11/17/2020  | Discuss data and doc request with RK                                       | 0.1         |
| 12/23/2020  | Review FAC                                                                 | 0.2         |
| 1/7/2021    | Consult with RK re: stip                                                   | 0.2         |
| 1/13/2021   | Discuss mediation with RK                                                  | 0.2         |
| 2/8/2021    | Review data and doc request with RK                                        | 0.4         |
| 2/9/2021    | Edit data demand letter and prior discussions w/ RK                        | 0.6         |
| 3/5/2021    | Update on mediation data                                                   | 0.3         |
| 3/20/2021   | Discuss mediation data requests and assignments w/ RK                      | 0.5         |
| 3/21/2021   | Email with RK re: mediation materials                                      | 0.3         |
| 3/22/2021   | Phone call with RK re: mediation                                           | 0.1         |
| 3/22/2021   | Call w/ defense re mediation data. Outline damages w/ RK.5                 | 0.5         |
| 3/23/2021   | Phone call with RK re: mediation data                                      | 0.1         |
| 3/24/2021   | Phone call with RK re: mediation data                                      | 0.1         |

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***

**L.A.S.C. Case No. 20STCV34691**

**Attorney Time – Isam C. Khoury**

|            |                                                                                                                                           |             |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| 3/24/2021  | Work on mediation outline and data review                                                                                                 | 0.5         |
| 3/25/2021  | Discuss case with RK                                                                                                                      | 0.1         |
| 3/25/2021  | Interview client and discuss mediation issues, call w/defense re wage statements w/ RK                                                    | 1.2         |
| 3/26/2021  | Review data and discuss randomized sampling                                                                                               | 0.3         |
| 4/2/2021   | Phone calls with RK re: brief                                                                                                             | 0.2         |
| 4/5/2021   | Mediation review claims and tip issue wages? Follow up w/ defense re clarification of data                                                | 1.0         |
| 4/7/2021   | Discuss mediation with RK                                                                                                                 | 0.3         |
| 4/9/2021   | Phone call with RK re: expert                                                                                                             | 0.1         |
| 4/9/2021   | Edit mediation brief and work on mediation presentation arguments                                                                         | 1.0         |
| 4/12/2021  | Review new information from defendant and work on mediation preparation and damage calculation revisions; request additional information. | 1.5         |
| 4/13/2021  | Finalize damage model w/ expert and prepare for mediation                                                                                 | 2.0         |
| 4/13/2021  | Review brief                                                                                                                              | 0.3         |
| 4/14/2021  | Mediation                                                                                                                                 | 11.0        |
| 4/16/2021  | Review MOU and outline issues                                                                                                             | 0.4         |
| 4/16/2021  | Call with RK re: MOU                                                                                                                      | 0.1         |
| 4/19/2021  | Call with RK re: MOU                                                                                                                      | 0.1         |
| 4/19/2021  | Reply to MOU points at issue, discuss w/ co-counsel re: individual settlement.                                                            | 0.8         |
| 4/19/2021  | Email with Mesriani                                                                                                                       | 0.1         |
| 4/19/2021  | Discuss MOU with RK                                                                                                                       | 0.2         |
| 4/20/2021  | Discuss MOU changes with RK                                                                                                               | 0.1         |
| 5/3/2021   | Review defense comments re: MOU                                                                                                           | 0.2         |
| 5/5/2021   | Email with RK re: processing settlement                                                                                                   | 0.1         |
| 6/2/2021   | Talk with RK re: call with client                                                                                                         | 0.1         |
| 9/9/2021   | Update on settlement processing                                                                                                           | 0.3         |
| 9/30/2021  | Prepare for call w/ defense re enlarged class size and MOU revisions                                                                      | 0.5         |
| 10/5/2021  | Discuss addition of new class members                                                                                                     | 0.3         |
| 11/23/2021 | Work on damage /kullar arguments and increased class size                                                                                 | 0.5         |
| 12/6/2021  | Discuss negotiations re rest break claim                                                                                                  | 0.3         |
| 9/28/2022  | Review & Revise Final Approval P's & A's and Supporting Declaration                                                                       | 2.3         |
|            | <b>Total Time</b>                                                                                                                         | <b>37.6</b> |

**EXHIBIT 3-C**  
**ATTORNEY TIME**  
**MICHAEL D. SINGER**

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Michael D. Singer**

| <b>Date</b> | <b>Activity</b>                                                     | <b>Time</b> |
|-------------|---------------------------------------------------------------------|-------------|
| 7/20/2020   | Discuss case with RK                                                | 0.1         |
| 7/20/2020   | Email re: case with RK                                              | 0.2         |
| 7/29/2020   | Review ESI and Catalyst                                             | 0.2         |
| 8/13/2020   | Review handbook                                                     | 0.2         |
| 9/8/2020    | Analysis of claims 1.0; confer w RK re PAGA letter and complaint .4 | 1.4         |
| 9/9/2020    | Email with RK                                                       | 0.2         |
| 9/9/2020    | Status review .2; review and revise PAGA letter 1.0                 | 1.2         |
| 9/9/2020    | Review PAGA letter                                                  | 0.2         |
| 9/21/2020   | Review defense call summary                                         | 0.2         |
| 10/5/2020   | Email with RK re: follow-up with defense                            | 0.2         |
| 10/29/2020  | Review case summary email from RK                                   | 0.2         |
| 10/30/2020  | Email with RK re: mediator                                          | 0.1         |
| 12/23/2020  | Email with RK re: FAC                                               | 0.1         |
| 3/31/2021   | Email with RK re: defense                                           | 0.1         |
| 4/2/2021    | Mediation prep 2.0                                                  | 2.0         |
| 4/12/2021   | Mediation prep 2.0                                                  | 2.0         |
| 6/21/2021   | Read RK email re: settlement                                        | 0.1         |
| 9/8/2021    | Read RK case update                                                 | 0.1         |
| 9/22/2021   | Receive update from RK on case status                               | 0.1         |
|             | <b>Total Time</b>                                                   | <b>8.9</b>  |

**EXHIBIT 3-D**  
**ATTORNEY TIME**  
**DIANA M. KHOURY**

**Lopez v. GE United Technologies, LLC d/b/a Grassdoor**  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Diana M. Khoury**

| <b>Date</b> | <b>Activity</b>                                                                                          | <b>Time</b> |
|-------------|----------------------------------------------------------------------------------------------------------|-------------|
| 6/23/2021   | Discuss docs from defense with RK                                                                        | 0.2         |
| 7/12/2021   | Email with RK re: call with defense                                                                      | 0.2         |
| 7/12/2021   | Review agreement; edits; tpcf with defense counsel; memo; co-counsel's costs                             | 1.5         |
| 7/12/2021   | Email with RK re: PA motion                                                                              | 0.3         |
| 7/12/2021   | Review costs                                                                                             | 0.1         |
| 7/12/2021   | Discuss PA motion with RK                                                                                | 0.2         |
| 7/16/2021   | Summary; status; emails t/f co-counsel re: declaration; bid requested; revise Notice, forward to defense | 2.1         |
| 7/19/2021   | Bids from simpluris; request from ILYM;                                                                  | 0.4         |
| 7/26/2021   | Discuss mediation investigation with RK                                                                  | 0.2         |
| 7/26/2021   | Review and revise Def's settlement agreement and return                                                  | 9           |
| 7/30/2021   | Discuss facts for PA needed with RK                                                                      | 0.2         |
| 8/2/2021    | Email with RK re: PA motion                                                                              | 0.2         |
| 8/4/2021    | Email with DMK re: PA motion                                                                             | 0.2         |
| 9/20/2021   | Email to defense re: status of edits                                                                     | 0.2         |
| 9/24/2021   | Call with RK                                                                                             | 0.2         |
| 9/28/2021   | Discuss SA with RK                                                                                       | 0.3         |
| 9/28/2021   | Review email with RK                                                                                     | 0.2         |
| 9/28/2021   | Email defense counsel                                                                                    | 0.2         |
| 9/29/2021   | Read email re: mediator                                                                                  | 0.1         |
| 9/29/2021   | Discuss negotiations with RK                                                                             | 0.1         |
| 9/30/2021   | Call with RK                                                                                             | 0.1         |
| 9/30/2021   | Read RK email re: defense call                                                                           | 0.1         |
| 10/13/2021  | Email t/OC re: increased size                                                                            | .3          |
| 11/15/2021  | Emails t/f defense; calculations; cf MDS                                                                 | 1.9         |
| 11/23/2021  | Evaluate papers; cf ICK/JG; emails t/f defense re: GSA                                                   | 1           |
| 11/24/2021  | Read RK email re: posting                                                                                | 0.1         |
| 11/27/2021  | Email with RK re: rest periods issue                                                                     | 0.3         |
| 11/30/2021  | Evaluate offer; cf RCK/MDS/ICK; reply                                                                    | 0.5         |
| 12/6/2021   | Email with RK re: rest periods issue                                                                     | 0.1         |
| 1/22/2022   | Analysis of data                                                                                         | 2.5         |
| 1/24/2022   | Analysis of data; counter demand                                                                         | 2.5         |
| 1/26/2022   | review acceptance; email re: cmc report                                                                  | 0.5         |
| 1/27/2022   | SC report; emails t/f re: extension; cf re: tasks                                                        | 0.5         |
| 1/31/2022   | Email t/OC re: status of agreement; update terms/summary; forward notice; cf RCK                         | 1.2         |
| 2/11/2022   | Email t/f defense counsel re: SA / edits                                                                 | .9          |
| 2/14/2022   | Email defense re: edits                                                                                  | 0.2         |
| 2/15/2022   | Review defense edits to SA (compare with edits made 7/21); emails t/f defense                            | 3.5         |

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Diana M. Khoury**

|           |                                                                                                                                    |             |
|-----------|------------------------------------------------------------------------------------------------------------------------------------|-------------|
| 2/18/2022 | Review defense edits and return                                                                                                    | 0.6         |
| 2/22/2022 | Review, revise and finalize settlement agreement                                                                                   | 0.9         |
| 2/22/2022 | Draft exhibits and forward                                                                                                         | 2.3         |
| 2/28/2022 | Revise class notice; change of address form                                                                                        | 5.1         |
| 3/1/2022  | Revise prelim and final approval order; SAC, stip to file                                                                          | 2.1         |
| 3/2/2022  | Motion                                                                                                                             | 3.5         |
| 3/3/2022  | Motion; forward to defense counsel                                                                                                 | 5.8         |
| 3/3/2022  | Class rep declaration                                                                                                              | 1.6         |
| 3/16/2022 | Review all OC edits; emails t/f co-counsel, administrator re: decs; OC re: remaining items                                         | 5.9         |
| 3/17/2022 | Emails t/f OC re: LASC rules re: judgment; finalize papers; emails f/t co-counsel; tpcf OC re: his edits; finalize, PDF and return | 2.1         |
| 3/23/2022 | Motion; email t/f OC;                                                                                                              | 0.8         |
| 5/24/2022 | Calls with RK re: PA hearing                                                                                                       | 0.2         |
|           | <b>Total Time</b>                                                                                                                  | <b>63.6</b> |

**EXHIBIT 3-E**

**ATTORNEY TIME**

**ROSEMARY C. KHOURY**

**Lopez v. GE United Technologies, LLC d/b/a Grassdoor**  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Rosemary C. Khoury**

| <b>Date</b> | <b>Activity</b>                                     | <b>Time</b> |
|-------------|-----------------------------------------------------|-------------|
| 7/20/2020   | Discussion with MDS                                 | 0.1         |
| 7/20/2020   | Check AW emails                                     | 0.1         |
| 7/20/2020   | Email with MDS                                      | 0.2         |
| 7/22/2020   | Re-Read MDS email                                   | 0.1         |
| 7/22/2020   | Casefile review                                     | 0.4         |
| 7/27/2020   | Review assignment and case file                     | 1           |
| 7/28/2020   | Writing ESI Ntc (start)                             | 0.5         |
| 7/28/2020   | Writing Catalyst Letter (start)                     | 0.3         |
| 7/29/2020   | Writing Catalyst Letter (finish)                    | 0.5         |
| 7/29/2020   | Writing ESI Ntc (finish)                            | 0.5         |
| 7/29/2020   | sent to MDS for approval                            | 0.2         |
| 7/30/2020   | Email AW                                            | 0.2         |
| 7/30/2020   | Double-Check ESI Ntc and Catlyst Ltr                | 0.3         |
| 7/30/2020   | Read AW emails re: Send out letters                 | 0.1         |
| 8/3/2020    | Setting up and starting PAGA notice                 | 0.3         |
| 8/3/2020    | Setting up complaint                                | 0.3         |
| 8/7/2020    | Review deadlines                                    | 0.1         |
| 8/7/2020    | Phone call with AW about deadlines                  | 0.1         |
| 8/7/2020    | Review docs                                         | 0.5         |
| 8/10/2020   | Doc review and complaint note-taking                | 0.4         |
| 8/12/2020   | Email Plaintiff about talking tomorrow or Friday    | 0.3         |
| 8/12/2020   | Email Plaintiff                                     | 0.1         |
| 8/13/2020   | Read through client docs                            | 0.3         |
| 8/13/2020   | Generating questions for phone call this afternoon  | 1.2         |
| 8/13/2020   | Call Luis Lopez                                     | 0.8         |
| 8/13/2020   | Email handbook to MDS                               | 0.1         |
| 8/18/2020   | Phone call about paystubs                           | 0.1         |
| 8/20/2020   | Search G:drive for tips cause of action             | 0.2         |
| 8/20/2020   | Look up case law on withholding tips and writing up | 0.8         |
| 8/20/2020   | Draft complaint                                     | 0.1         |
| 8/20/2020   | Draft PAGA Ntc                                      | 0.5         |
| 8/26/2020   | Draft PAGA Ntc                                      | 0.5         |
| 8/26/2020   | Company Research                                    | 0.1         |
| 8/26/2020   | Email ICK company info                              | 0.1         |
| 8/26/2020   | Brainstorming with ICK about causes of action       | 0.4         |
| 8/27/2020   | Email with ICK                                      | 0.1         |
| 9/2/2020    | Discuss case with ICK                               | 0.2         |
| 9/2/2020    | Draft PAGA Ntc                                      | 0.9         |
| 9/2/2020    | Email Plaintiff questions                           | 0.2         |

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Rosemary C. Khoury**

|           |                                                      |     |
|-----------|------------------------------------------------------|-----|
| 9/2/2020  | Read Plaintiff reply                                 | 0.1 |
| 9/2/2020  | Responding to email                                  | 0.1 |
| 9/3/2020  | Read emails with Plaintiff                           | 0.2 |
| 9/8/2020  | PAGA letter                                          | 2.7 |
| 9/8/2020  | Revising schedule for week                           | 0.2 |
| 9/9/2020  | PAGA letter (complete)                               | 0.8 |
| 9/9/2020  | Writing complaint                                    | 1.4 |
| 9/9/2020  | Read emails from MDS                                 | 0.1 |
| 9/9/2020  | Email MDS back                                       | 0.1 |
| 9/9/2020  | Attorney hourly rate Research                        | 0.3 |
| 9/9/2020  | PAGA letter, final Proofread                         | 0.2 |
| 9/9/2020  | Send letter to MDS and AW                            | 0.1 |
| 9/9/2020  | Email AW about Finalize PAGA letter                  | 0.1 |
| 9/9/2020  | Read PAGA filing email                               | 0.1 |
| 9/9/2020  | Read fee notice email                                | 0.1 |
| 9/10/2020 | Writing complaint (continue)                         | 4.2 |
| 9/10/2020 | Discuss strategy with ICK                            | 0.2 |
| 9/10/2020 | Email AW about complaint                             | 0.1 |
| 9/10/2020 | Look over MDS case assignment to me                  | 0.1 |
| 9/10/2020 | Read AW email about when to send complaint           | 0.1 |
| 9/10/2020 | Research emergency tolling of SOL                    | 0.1 |
| 9/10/2020 | Responding to AW email                               | 0.1 |
| 9/11/2020 | Draft complaint (finish)                             | 1.5 |
| 9/11/2020 | Read scheduling email for amending complaint         | 0.1 |
| 9/11/2020 | Email with AW about wage statement subclass          | 0.1 |
| 9/11/2020 | Email with AW about complaint being submitted        | 0.1 |
| 9/11/2020 | Final Proofread of Complaint                         | 0.8 |
| 9/11/2020 | Email with AW about judge assigned                   | 0.1 |
| 9/11/2020 | Westlaw report on judge                              | 0.2 |
| 9/15/2020 | Attorney meeting discussion                          | 0.2 |
| 9/16/2020 | Discussion with ICK about claims                     | 0.3 |
| 9/18/2020 | Read and responding to emails                        | 0.2 |
| 9/18/2020 | Read AW email and attachments                        | 0.2 |
| 9/18/2020 | Creating rundown of where the case is                | 0.3 |
| 9/18/2020 | Review deadlines                                     | 0.1 |
| 9/18/2020 | Email with opposing counsel                          | 0.1 |
| 9/18/2020 | Email with Garrett Jensen                            | 0.1 |
| 9/20/2020 | Discussion with ICK about upcoming call with defense | 0.2 |
| 9/21/2020 | Discussion with ICK about claims before call         | 0.5 |
| 9/21/2020 | Phone call with defense counsel                      | 0.3 |

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**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Rosemary C. Khoury**

|            |                                                                                                                    |     |
|------------|--------------------------------------------------------------------------------------------------------------------|-----|
| 9/21/2020  | Making list of asks for discovery based on ICK recs                                                                | 0.1 |
| 9/21/2020  | Phone call with ICK about defense call                                                                             | 0.1 |
| 9/21/2020  | Read Sam's clarification and forwarding them                                                                       | 0.2 |
| 9/21/2020  | Creating rundown of case                                                                                           | 0.4 |
| 9/21/2020  | Research of when a case is stayed                                                                                  | 0.1 |
| 9/21/2020  | Research whether federal mileage rate is per se sufficient                                                         | 0.1 |
| 9/21/2020  | Email MDS and Mesriani summary of call                                                                             | 0.3 |
| 9/21/2020  | Read Mesriani email                                                                                                | 0.1 |
| 9/22/2020  | Read Mesriani mediation email                                                                                      | 0.1 |
| 9/22/2020  | Discuss mediation with ICK                                                                                         | 0.1 |
| 9/22/2020  | Read ICK email on mediation thoughts                                                                               | 0.1 |
| 9/28/2020  | Creating master schedule document for myself                                                                       | 0.2 |
| 9/29/2020  | Discuss strategy with ICK                                                                                          | 0.1 |
| 10/5/2020  | Email with MDS about following up with ICK/defense                                                                 | 0.2 |
| 10/5/2020  | Email with AW about serving defendant                                                                              | 0.1 |
| 10/5/2020  | Email AW about asking MDS/ICK what to do with complaint                                                            | 0.1 |
| 10/5/2020  | Email AW to serve complaint                                                                                        | 0.1 |
| 10/5/2020  | Update ICK on discovery and other issues                                                                           | 0.4 |
| 10/7/2020  | Read emails from AW to defense and co-counsel                                                                      | 0.2 |
| 10/8/2020  | Read email with defense deadline                                                                                   | 0.1 |
| 10/19/2020 | Creating chart of every aspect of case                                                                             | 0.6 |
| 10/19/2020 | Email with AW about CMC                                                                                            | 0.1 |
| 10/19/2020 | Email with AW about initial CMC                                                                                    | 0.1 |
| 10/19/2020 | Read judge's orders                                                                                                | 0.3 |
| 10/20/2020 | Email with Amber about complex fee                                                                                 | 0.1 |
| 10/22/2020 | Reding CMC scheduling email from AW to defense counsel                                                             | 0.1 |
| 10/22/2020 | Check on deadlines and creating draft of email for defense counsel about meet and confer and joint statement       | 0.2 |
| 10/22/2020 | Going over calendar for next few weeks with AW                                                                     | 0.1 |
| 10/26/2020 | Email defense counsel about meet and confer                                                                        | 0.1 |
| 10/27/2020 | Discuss discovery and CMC with ICK                                                                                 | 0.4 |
| 10/27/2020 | Read judge's order re: initial CMC and statement                                                                   | 0.2 |
| 10/27/2020 | Email defense counsel                                                                                              | 0.1 |
| 10/27/2020 | Creating CMC statement                                                                                             | 1.9 |
| 10/27/2020 | Calculating when can amend to add PAGA                                                                             | 0.1 |
| 10/28/2020 | Read notice of appearance from defense counsel                                                                     | 0.1 |
| 10/28/2020 | Review and amending deadlines for next few weeks                                                                   | 0.2 |
| 10/29/2020 | Email defense counsel again after two attempts to try to set up meet and confer and get service provider agreed on | 0.2 |

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Rosemary C. Khoury**

|            |                                                                                                                                                                                                                               |     |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 10/29/2020 | Email MDS update on case and asking about cc protocol for my emails                                                                                                                                                           | 0.2 |
| 10/29/2020 | Asking another attorney best practice when defense will not respond to emails                                                                                                                                                 | 0.3 |
| 10/29/2020 | Discuss nonresponsive defense counsel issue                                                                                                                                                                                   | 0.1 |
| 10/29/2020 | Left voicemail around 1:45 p.m. for David Hagopian about Grassdoor meet and confer; requesting a call back; if no call back by tomorrow, just file our side of statement on Monday; note he was in office ("on another call") | 0.2 |
| 10/29/2020 | Research Highberger discovery                                                                                                                                                                                                 | 0.5 |
| 10/29/2020 | Discuss how AW will draft a dec to show our efforts to contact defense                                                                                                                                                        | 0.1 |
| 10/29/2020 | Discuss CMC statement with TC: add statement about agreeing to mediate and that we are working out details                                                                                                                    | 0.2 |
| 10/29/2020 | Going over calendar with AW                                                                                                                                                                                                   | 0.1 |
| 10/29/2020 | Email back and forth with defense about stipulation                                                                                                                                                                           | 0.3 |
| 10/29/2020 | Email Karla about court call which may go off calendar                                                                                                                                                                        | 0.1 |
| 10/29/2020 | Research mediator defense counsel proposed                                                                                                                                                                                    | 0.2 |
| 10/29/2020 | Discuss emails to defense with ICK                                                                                                                                                                                            | 0.5 |
| 10/30/2020 | Discuss changes to stip with Amber                                                                                                                                                                                            | 0.1 |
| 10/30/2020 | Discussion with Sam about high-level strategy and mediator choice                                                                                                                                                             | 0.3 |
| 10/30/2020 | Email firm about mediator proposal with links to his pages                                                                                                                                                                    | 0.1 |
| 10/30/2020 | Email CELA about mediator and asking for input                                                                                                                                                                                | 0.1 |
| 10/30/2020 | Resetting password so AW can post stip to Board; forwarding to AW                                                                                                                                                             | 0.1 |
| 10/30/2020 | Email with JG about mediator                                                                                                                                                                                                  | 0.2 |
| 10/30/2020 | Email ICK and MDS about mediator                                                                                                                                                                                              | 0.1 |
| 11/2/2020  | Talking about mediator and Email defense and doc request                                                                                                                                                                      | 0.1 |
| 11/2/2020  | Email defense agreeing to mediate with Todd Smith in April                                                                                                                                                                    | 0.1 |
| 11/2/2020  | Calendaring mediation for April 14th with Todd Smith; updating assignments upon defense email                                                                                                                                 | 0.2 |
| 11/2/2020  | Forwarding defense correspondence to co-counsel                                                                                                                                                                               | 0.1 |
| 11/2/2020  | Email with co-counsel and updating assisting attorneys in player's list                                                                                                                                                       | 0.1 |
| 11/2/2020  | Updating deadlines for new CMC                                                                                                                                                                                                | 0.1 |
| 11/2/2020  | Talking with ICK and reSend remedies chart to him                                                                                                                                                                             | 0.1 |
| 11/3/2020  | Email with assistant and sorting out who to email and mediation details                                                                                                                                                       | 0.2 |
| 11/4/2020  | Updating all deadlines from calendar and emails                                                                                                                                                                               | 0.1 |
| 11/4/2020  | Sorting and Review emails                                                                                                                                                                                                     | 0.3 |
| 11/9/2020  | Email Garrett about time/location of April 14th mediation                                                                                                                                                                     | 0.2 |

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Rosemary C. Khoury**

|            |                                                                                                                                                                   |     |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 11/10/2020 | Email with defense about mediation time and location                                                                                                              | 0.1 |
| 11/12/2020 | Check schedule and updating dates                                                                                                                                 | 0.1 |
| 11/16/2020 | Amending complaint to add PAGA                                                                                                                                    | 1.2 |
| 11/16/2020 | Email Plaintiff about mediation                                                                                                                                   | 0.3 |
| 11/17/2020 | Draft FAC                                                                                                                                                         | 0.2 |
| 11/17/2020 | Discuss data and doc request with ICK                                                                                                                             | 0.1 |
| 11/17/2020 | Draft FAC                                                                                                                                                         | 0.2 |
| 11/17/2020 | Discuss with ICK whether to add 2nd MP claim-try to find evidence somewhere in records; also remember, for PAGA, plaintiff need not suffer every violation listed | 0.2 |
| 11/20/2020 | Email AW about whether we can file FAC with stay in place                                                                                                         | 0.2 |
| 11/20/2020 | Email with Amber about FAC                                                                                                                                        | 0.2 |
| 12/17/2020 | Read stip to continue                                                                                                                                             | 0.1 |
| 12/17/2020 | Email AW that I will send and changes made                                                                                                                        | 0.1 |
| 12/17/2020 | Editing stip to continue and proposed order                                                                                                                       | 0.1 |
| 12/17/2020 | Send stip to continue and proposed order to OC                                                                                                                    | 0.1 |
| 12/18/2020 | Read AW email about FAC                                                                                                                                           | 0.1 |
| 12/18/2020 | Call AW about FAC                                                                                                                                                 | 0.1 |
| 12/18/2020 | Read case anywhere submission with docs                                                                                                                           | 0.1 |
| 12/21/2020 | Amending complaint to add PAGA                                                                                                                                    | 1.2 |
| 12/21/2020 | Check and Read emails with client                                                                                                                                 | 0.2 |
| 12/22/2020 | Amending complaint to add PAGA; Research best way                                                                                                                 | 1.7 |
| 12/23/2020 | Amending to add PAGA (finish)                                                                                                                                     | 1.5 |
| 12/23/2020 | Email AW, MDS, and ICK Grassdoor FAC                                                                                                                              | 0.1 |
| 12/23/2020 | Email with AW about stipulation                                                                                                                                   | 0.1 |
| 12/23/2020 | Read and editing stipulation                                                                                                                                      | 0.1 |
| 12/23/2020 | Read and editing proposed order                                                                                                                                   | 0.1 |
| 12/23/2020 | Adding language from AW to Grassdoor FAC                                                                                                                          | 0.2 |
| 12/23/2020 | Email with AW about Grassdoor stip, order, and FAC                                                                                                                | 0.1 |
| 12/23/2020 | Email with AW about changes to FAC; Look over                                                                                                                     | 0.2 |
| 12/23/2020 | Email with AW about Matthew Send complaint                                                                                                                        | 0.1 |
| 12/23/2020 | Email with Matthew about Grassdoor FAC                                                                                                                            | 0.1 |
| 12/23/2020 | Send defense email with FAC, FAC redline, Stip, And Order after Read                                                                                              | 0.4 |
| 12/23/2020 | Read several preliminary approval orders/supplemental briefings to understand what will be needed in a settlement agreement                                       | 1   |
| 1/4/2021   | Updating schedule of assignments                                                                                                                                  | 0.2 |
| 1/4/2021   | Reminding defense about stipulation and asking them to sign                                                                                                       | 0.2 |
| 1/5/2021   | Attorney Meeting                                                                                                                                                  | 0.1 |
| 1/6/2021   | Calendar with AW                                                                                                                                                  | 0.1 |

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Rosemary C. Khoury**

|           |                                                                                                                   |     |
|-----------|-------------------------------------------------------------------------------------------------------------------|-----|
| 1/7/2021  | Read over amendments to stipulation; finalize after ICK consult                                                   | 0.2 |
| 1/8/2021  | Phone call with ICK about amendments to stip                                                                      | 0.1 |
| 1/8/2021  | Accept changes to stip and order and saving final versions                                                        | 0.2 |
| 1/8/2021  | Email defense counsel to sign, date, and return for filing                                                        | 0.1 |
| 1/8/2021  | Email AW about filing 3 docs after Look through for final versions                                                | 0.2 |
| 1/8/2021  | Sitting in on Aerotek mediation to learn about the process for Grassdoor mediation                                | 0.6 |
| 1/8/2021  | Zoom with KDLR about getting defense to give info for mediation                                                   | 0.1 |
| 1/8/2021  | Check how long until mediation (96 days)                                                                          | 0.1 |
| 1/13/2021 | Discuss mediation strategy with ICK                                                                               | 0.2 |
| 1/14/2021 | Read email about continued initial CMC til after mediation                                                        | 0.1 |
| 1/15/2021 | Research techniques for completing necessary work without deadlines                                               | 0.4 |
| 1/26/2021 | Read email about FAC; Look at G:drive related docs and calendar                                                   | 0.2 |
| 1/26/2021 | Phone call with AW about filing FAC                                                                               | 0.1 |
| 1/28/2021 | Email with MA about filing FAC tomorrow                                                                           | 0.1 |
| 1/29/2021 | Email with AW about notice of entry and FAC                                                                       | 0.1 |
| 1/29/2021 | Read email saying FAC was submitted                                                                               | 0.1 |
| 1/29/2021 | Starting data and doc request                                                                                     | 0.2 |
| 2/1/2021  | Draft data and doc request                                                                                        |     |
| 2/3/2021  | Check and updating schedule                                                                                       | 0.1 |
| 2/3/2021  | Email with defense counsel about mediation confirmation and that we will send data and doc request by Monday, 2/8 | 0.3 |
| 2/3/2021  | Check and updating schedule after Read mediation confirmation                                                     | 0.2 |
| 2/8/2021  | Read FAC to help with data and doc request                                                                        | 1.2 |
| 2/8/2021  | Going over data and doc request with ICK and Finalize                                                             | 0.4 |
| 2/8/2021  | Proofread data and doc request                                                                                    | 0.3 |
| 2/8/2021  | Email defense counsel data and doc request                                                                        | 0.1 |
| 2/9/2021  | Check PAGA website for filings                                                                                    | 0.1 |
| 2/10/2021 | Setting deadline to nudge defense about production if no response (2/15)                                          | 0.1 |
| 2/22/2021 | Email defense counsel about scheduling phone call to discuss data and doc request in advance of mediation         | 0.2 |
| 3/3/2021  | Email defense counsel again with data and doc request                                                             | 0.3 |
| 3/8/2021  | Read and responding to defense counsel email                                                                      | 0.1 |
| 3/15/2021 | Look up what we have already received for mediation                                                               | 0.1 |
| 3/15/2021 | Email with defense counsel about documents                                                                        | 0.1 |
| 3/16/2021 | Review email and materials provided by Garrett                                                                    | 0.5 |
| 3/18/2021 | Email about mediation                                                                                             | 0.2 |
| 3/21/2021 | Check on what we have and what we need for mediation                                                              | 0.3 |
| 3/21/2021 | Draft mediation materials and emails with ICK                                                                     | 0.9 |

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Rosemary C. Khoury**

|           |                                                                                 |     |
|-----------|---------------------------------------------------------------------------------|-----|
| 3/21/2021 | Updating case deadlines                                                         | 0.1 |
| 3/22/2021 | Phone call with ICK Discuss moving Grassdoor                                    | 0.1 |
| 3/22/2021 | Leave voicemails to ask for dates                                               | 0.1 |
| 3/22/2021 | Phone call with defense attorneys about mediation                               | 0.4 |
| 3/23/2021 | Draft what we still need for mediation                                          | 0.5 |
| 3/23/2021 | Phone call with ICK about what we already have                                  | 0.1 |
| 3/23/2021 | Email defense counsel that I will reach out tomorrow with anything else we need | 0.2 |
| 3/24/2021 | Email with defense attorneys about phone call                                   | 0.1 |
| 3/24/2021 | Talking with ICK about mediation and what we still need                         | 0.1 |
| 3/25/2021 | Email with defense attorneys about phone call                                   | 0.1 |
| 3/25/2021 | Coming up with asks for mediation                                               | 1   |
| 3/25/2021 | Discuss case with ICK                                                           | 0.1 |
| 3/31/2021 | Email with MDS about defense email                                              | 0.1 |
| 4/1/2021  | Look over new data provided                                                     | 0.4 |
| 4/1/2021  | Read defense email                                                              | 0.1 |
| 4/1/2021  | Asking AW to apply signature to stip and send                                   | 0.1 |
| 4/2/2021  | Phone call with ICK about Grassdoor mediation brief                             | 0.1 |
| 4/5/2021  | Updating schedule                                                               | 0.1 |
| 4/5/2021  | Draft mediation brief                                                           | 0.5 |
| 4/5/2021  | Phone call with ICK about mediation                                             | 0.1 |
| 4/5/2021  | Draft mediation brief                                                           | 0.2 |
| 4/5/2021  | Call with client clarifying a few points                                        | 0.1 |
| 4/5/2021  | Phone call with ICK                                                             | 0.1 |
| 4/5/2021  | Updating deadlines                                                              | 0.1 |
| 4/7/2021  | Read email from expert                                                          | 0.1 |
| 4/7/2021  | Discuss mediation with ICK                                                      | 0.3 |
| 4/7/2021  | Email Bennett initial information and questions; setting up 1 p.m. call         | 0.1 |
| 4/7/2021  | Discuss mediation with JG                                                       | 0.2 |
| 4/7/2021  | Phone call with Bennett about mediation data                                    | 0.5 |
| 4/8/2021  | Read example mediation briefs                                                   | 0.4 |
| 4/8/2021  | Draft mediation brief                                                           | 1.8 |
| 4/9/2021  | Finishing brief                                                                 | 2.6 |
| 4/9/2021  | Updating and Check deadlines                                                    | 0.1 |
| 4/9/2021  | Phone call with ICK about brief changes and expert                              | 0.1 |
| 4/9/2021  | Accept brief changes and Proofread                                              | 0.3 |
| 4/9/2021  | Send brief to Todd Smith                                                        | 0.2 |
| 4/9/2021  | Email with AW about converting files to .pdf                                    | 0.1 |
| 4/12/2021 | Read defense reply to questions                                                 | 0.1 |
| 4/13/2021 | Call AW for schedule                                                            | 0.1 |

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Rosemary C. Khoury**

|           |                                                                         |     |
|-----------|-------------------------------------------------------------------------|-----|
| 4/13/2021 | Call with Bennett and ICK                                               | 0.4 |
| 4/13/2021 | Email ICK brief                                                         | 0.1 |
| 4/14/2021 | Getting new damages model from Bennett                                  | 0.1 |
| 4/14/2021 | Send damages model and explanation email to mediator and others         | 0.4 |
| 4/14/2021 | Mediation (Attend and Draft MOU) with ICK                               | 11  |
| 4/16/2021 | Call ICK about MOU                                                      | 0.4 |
| 4/16/2021 | Redlining MOU                                                           | 0.5 |
| 4/16/2021 | Send MOU to ICK for redline                                             | 0.1 |
| 4/19/2021 | Phone call with ICK about MOU                                           | 0.1 |
| 4/19/2021 | Draft notes for MOU with ICK                                            | 0.5 |
| 4/19/2021 | Read emails between Mesriani and ICK                                    | 0.1 |
| 4/19/2021 | Discuss MOU with ICK                                                    | 0.2 |
| 4/19/2021 | Email with Mesriani about ind settlement                                | 0.1 |
| 4/19/2021 | Email Garrett MOU redline and proposed changes; asking about phone call | 0.2 |
| 4/20/2021 | Amending schedule                                                       | 0.1 |
| 4/20/2021 | Asking MA to prepare notice of settlement                               | 0.1 |
| 4/20/2021 | Look at other settlement agreements comparatively for terms             | 0.4 |
| 4/20/2021 | Review stip, making changes, and asking MA to send to defense           | 0.2 |
| 4/20/2021 | Discuss MOU changes with ICK                                            | 0.1 |
| 4/23/2021 | Email with AW and MA about CMC                                          | 0.2 |
| 4/23/2021 | Updating schedule                                                       | 0.2 |
| 5/3/2021  | Email with defense counsel about settlement terms                       | 0.1 |
| 5/5/2021  | Email MA and AW about signatures on MOU                                 | 0.1 |
| 5/5/2021  | Email with ICK about processing settlement                              | 0.1 |
| 5/10/2021 | Email AW about Mesriani signing settlement agreement                    | 0.1 |
| 5/10/2021 | Email signed settlement agreement to defense                            | 0.1 |
| 5/10/2021 | Email BV approving expert costs                                         | 0.1 |
| 5/11/2021 | Email with Garrett about MOU                                            | 0.1 |
| 5/18/2021 | Updating deadlines                                                      | 0.2 |
| 5/28/2021 | Email AW about FAC answer                                               | 0.1 |
| 6/3/2021  | Call with plaintiff updating about settlement                           | 0.3 |
| 6/3/2021  | Talking to ICK about call with client                                   | 0.1 |
| 6/10/2021 | Email with AW about Grassdoor FAC                                       | 0.1 |
| 6/10/2021 | Research answer timing and settlement and Email AW                      | 0.4 |
| 6/21/2021 | Email MDS about Grassdoor settlement                                    | 0.1 |
| 6/23/2021 | Review stip and class notice from defense counsel briefly               | 0.1 |
| 6/23/2021 | Email with defense counsel and CKS about stip and class notice review   | 0.1 |
| 6/23/2021 | Discuss docs sent by defense with DMK                                   | 0.2 |

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Rosemary C. Khoury**

|           |                                                                                      |     |
|-----------|--------------------------------------------------------------------------------------|-----|
| 7/8/2021  | Call Diana about Discuss JSS and class notice with defense                           | 0.1 |
| 7/8/2021  | Email defense counsel about talking on Monday about JSS and class notice             | 0.1 |
| 7/8/2021  | Email defense call-in for Monday                                                     | 0.1 |
| 7/12/2021 | Email with DMK about call with defense                                               | 0.2 |
| 7/12/2021 | Preparing for call this morning                                                      | 0.1 |
| 7/12/2021 | Email with DMK about Draft preliminary approval motion                               | 0.2 |
| 7/12/2021 | Look up and Send costs to DMK                                                        | 0.1 |
| 7/12/2021 | Read DMK email to Mesriani on costs                                                  | 0.1 |
| 7/12/2021 | Phone call with defense                                                              | 0.3 |
| 7/12/2021 | Discuss preliminary approval motion with DMK                                         | 0.2 |
| 7/12/2021 | Email with DMK about preliminary approval motion                                     | 0.1 |
| 7/13/2021 | Read email from co-counsel about costs                                               | 0.1 |
| 7/19/2021 | Read emails on bids                                                                  | 0.1 |
| 7/23/2021 | Talking with AW about stip to continue CMC                                           | 0.1 |
| 7/26/2021 | Email with AW about joint statement after Review                                     | 0.2 |
| 7/26/2021 | Discuss what was done for mediation with DMK                                         | 0.2 |
| 7/30/2021 | Review preliminary approval motions for guidance on Draft                            | 0.5 |
| 7/30/2021 | Discuss preliminary approval motion with DMK--use consolidated as example            | 0.2 |
| 7/30/2021 | Discuss facts needed to process settlement with DMK                                  | 0.2 |
| 8/2/2021  | Email with DMK about motion for preliminary approval                                 | 0.2 |
| 8/4/2021  | Read statement for non-appearance case review                                        | 0.1 |
| 8/4/2021  | Email with DMK about which examples to look at for preliminary approval motion Draft | 0.2 |
| 8/9/2021  | Informing DMK of availability to discuss motion for preliminary approval             | 0.1 |
| 8/17/2021 | Creating initial drafts of documents for preliminary approval                        | 0.2 |
| 8/17/2021 | Draft NOM                                                                            | 0.5 |
| 8/31/2021 | Check on next CMC date (10/1-non-appearance case review)                             | 0.1 |
| 8/31/2021 | Creating schedule for next few weeks                                                 | 0.1 |
| 9/8/2021  | Email MDS case update                                                                | 0.1 |
| 9/9/2021  | Calendar review with AW                                                              | 0.1 |
| 9/20/2021 | Read DMK email to defense re: settlement agreement                                   | 0.1 |
| 9/22/2021 | Update MDS on case status                                                            | 0.1 |
| 9/22/2021 | Calendar review with AW                                                              | 0.1 |
| 9/24/2021 | Check upcoming deadlines                                                             | 0.1 |
| 9/24/2021 | Call DMK re: Grassdoor                                                               | 0.2 |
| 9/24/2021 | Email MDS about posting to Case Anywhere message board                               | 0.1 |
| 9/24/2021 | Read message with defense re: settlement                                             | 0.1 |
| 9/28/2021 | Phone call with Todd Smith re: settlement agreement                                  | 0.2 |

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***  
**L.A.S.C. Case No. 20STCV34691**  
**Attorney Time – Rosemary C. Khoury**

|            |                                                                                         |     |
|------------|-----------------------------------------------------------------------------------------|-----|
| 9/28/2021  | Discuss defense concerns with settlement agreement with DMK                             | 0.3 |
| 9/28/2021  | Review email with DMK                                                                   | 0.2 |
| 9/28/2021  | Read email from DMK to defense counsel                                                  | 0.1 |
| 9/29/2021  | Email Tripper re: update                                                                | 0.1 |
| 9/29/2021  | Email Tripper re: no more help needed--mistake                                          | 0.1 |
| 9/29/2021  | Call with Tripper re: his involvement--no more needed                                   | 0.1 |
| 9/29/2021  | Email DMK re: mediator                                                                  | 0.1 |
| 9/29/2021  | Mail mediator re: talking with defense                                                  | 0.1 |
| 9/29/2021  | Discuss negotiations with DMK                                                           | 0.1 |
| 9/30/2021  | Calls with DMK re: Grassdoor                                                            | 0.1 |
| 9/30/2021  | Research issues for cert                                                                | 0.3 |
| 9/30/2021  | Email DMK notes for call with defense                                                   | 0.1 |
| 9/30/2021  | Refine schedule                                                                         | 0.1 |
| 10/5/2021  | Email with DMK re: defense counter offer                                                | 0.1 |
| 10/5/2021  | Attorney Meeting                                                                        | 0.1 |
| 10/8/2021  | Read email re: defense counter on settlement                                            | 0.1 |
| 10/18/2021 | Read email from defense counsel re: updated class figures                               | 0.1 |
| 10/28/2021 | Read email with updated employment figures                                              | 0.1 |
| 11/11/2021 | Review calendar with AW                                                                 | 0.1 |
| 11/24/2021 | Email with AW and DMK re: posting after reviewing case status                           | 0.1 |
| 11/24/2021 | Email with AW re: message to defense                                                    | 0.1 |
| 11/26/2021 | Email with firm re: changes to GSA after doing extensive calculations and analyses      | 1.8 |
| 11/27/2021 | Email with DMK about what to do about rest period counter offer                         | 0.3 |
| 11/30/2021 | Email with Diana re: settlement                                                         | 0.1 |
| 11/30/2021 | Call with Diana re: settlement                                                          | 0.1 |
| 12/6/2021  | Email with DMK re: rest period claims                                                   | 0.1 |
| 4/5/2022   | Read emails                                                                             | 0.1 |
| 5/9/2022   | Update calendar                                                                         | 0.1 |
| 5/9/2022   | Email with AW re: CMC                                                                   | 0.1 |
| 5/9/2022   | Update calendar                                                                         | 0.1 |
| 5/9/2022   | Check for preliminary approval order                                                    | 0.1 |
| 5/10/2022  | Review calendar with AW                                                                 | 0.1 |
| 5/10/2022  | Read message continuing hearing                                                         | 0.1 |
| 5/12/2022  | Update preliminary approval info                                                        | 0.1 |
| 5/16/2022  | Check preliminary approval hearing information                                          | 0.1 |
| 5/19/2022  | Review and update upcoming deadlines                                                    | 0.1 |
| 5/19/2022  | Research effect of filing PAGA claims before notice period expires (LC 2699.3(a)(2)(A)) | 0.8 |
| 5/19/2022  | Email team re: procedural problem and research                                          | 0.3 |

***Lopez v. GE United Technologies, LLC d/b/a Grassdoor***

**L.A.S.C. Case No. 20STCV34691**

**Attorney Time – Rosemary C. Khoury**

|           |                                                            |             |
|-----------|------------------------------------------------------------|-------------|
| 5/24/2022 | Review all preliminary approval materials and take notes   | 2.1         |
| 5/24/2022 | Calls with DMK re: preliminary approval hearing            | 0.2         |
| 5/24/2022 | Preliminary approval hearing                               | 0.5         |
| 5/24/2022 | Email all re: preliminary approval recap                   | 0.1         |
| 5/26/2022 | Read email re: settlement administration                   | 0.1         |
| 5/31/2022 | Update deadlines for next 3 months and take strategy notes | 0.1         |
| 6/7/2022  | Email with Simpluris re: settlement administration         | 0.2         |
| 7/15/2022 | Read emails re: administration                             | 0.1         |
| 7/15/2022 | Email with defense re: administration                      | 0.1         |
| 7/25/2022 | Review notice documents                                    | 0.1         |
| 7/25/2022 | Email admin re: documents                                  | 0.1         |
| 8/8/2022  | Review weekly report                                       | 0.1         |
| 8/15/2022 | Review weekly report                                       | 0.1         |
| 8/29/2022 | Read weekly report                                         | 0.1         |
| 9/1/2022  | Update deadlines and tasks                                 | 0.2         |
| 9/2/2022  | Review weekly report                                       | 0.1         |
| 9/19/2022 | Update calendar                                            | 0.1         |
| 9/19/2022 | Review preliminary approval order and note what is needed  | 0.2         |
| 9/19/2022 | Review exemplar motion for final approval                  | 0.1         |
| 9/19/2022 | Review changes needed to settlement agreement and notice   | 0.2         |
| 9/19/2022 | Email team re: final approval and fees motion              | 0.2         |
| 9/19/2022 | Aggregate time                                             | 0.5         |
|           | <b>Total Time</b>                                          | <b>53.9</b> |

# **EXHIBIT 4**

**COHELAN KHOURY SINGER**

**Litigation Costs**

**Lopez v. GE United Technologies, LLC d/b/a Grassdoor**

**L.A.S.C. Case No. 20STCV34691**

| <u><b>Date</b></u> | <u><b>Payee</b></u>  | <u><b>Details</b></u>                      | <u><b>Amount</b></u> |
|--------------------|----------------------|--------------------------------------------|----------------------|
| 9/9/2020           | LWDA                 | PAGA Fee Notice                            | \$75.00              |
| 9/11/2020          | Express Network      | Summons/Complaint                          | \$1,613.50           |
| 10/22/2020         | Express Network      | Notice of Minute Order                     | \$35.00              |
| 10/28/2020         | Express Network      | Proof of Service of Summons                | \$55.00              |
| 11/2/2020          | Express Network      | Stipulation Re: Electronic Service         | \$80.00              |
| 12/18/2020         | Express Network      | Stipulation; Prop. Order; Dec.             | \$110.00             |
| 1/8/2021           | Express Network      | Stipulation; Prop. Order; Dec.             | \$146.00             |
| 1/11/2021          | Case Anywhere        | 10/30-12/31/20 (Mesriani)                  | \$81.60              |
| 1/14/2021          | Case Anywhere        | 10/30-12/31/20 (CKS)                       | \$117.60             |
| 1/15/2021          | Express Network      | Notice of Entry of Order Cont.             | \$65.00              |
| 1/29/2021          | Express Network      | Notice of Entry of Order FAC               | \$65.00              |
| 2/8/2021           | Todd Smith, Esq.     | Mediation Fee                              | \$7,000.00           |
| 4/6/2021           | Case Anywhere        | 1/1-3/31/21 (Mesriani)                     | \$120.00             |
| 4/6/2021           | Case Anywhere        | 1/1-3/31/21 (CKS)                          | \$156.00             |
| 5/10/2021          | Consulting Firm      | Damages Consultant                         | \$1,237.50           |
| 7/26/2021          | Case Anywhere        | 4/1-6/30/21 (CKS)                          | \$120.00             |
| 7/26/2021          | Express Network      | Joint Statement Re: Status of Sett.        | \$104.00             |
| 10/7/2021          | Case Anywhere        | 4/1-9/30/21 (Mesriani)                     | \$240.00             |
| 10/7/2021          | Case Anywhere        | 7/1-9/30/21 (CKS)                          | \$126.00             |
| 1/26/2022          | Case Anywhere        | 10/1-12/31/21 (CKS)                        | \$120.00             |
| 1/31/2022          | One Legal            | Notice of Appearance                       | \$16.68              |
| 2/2/2022           | Consulting Firm      | Damages Consultant                         | \$450.00             |
| 3/5/2022           | One Legal            | Motion for Preliminary Approval            | \$78.96              |
| 3/21/2022          | One Legal            | Stipulation                                | \$17.19              |
| 3/21/2022          | One Legal            | Stipulation Courtesy Copy                  | \$54.31              |
| 3/21/2022          | One Legal            | Stipulation and Order; POS                 | \$12.87              |
| 3/25/2022          | One Legal            | Stipulation and Order                      | \$37.78              |
| 3/28/2022          | One Legal            | Stipulation and Order                      | \$42.21              |
| 3/28/2022          | One Legal            | Motion for Prelim. Appr. Courtesy Copy     | \$83.90              |
| 4/5/2022           | One Legal            | Notice                                     | \$17.19              |
| 4/13/2022          | Case Anywhere        | 1/22-3/31/22                               | \$198.00             |
| 8/19/2022          | Case Anywhere        | 4/1-6/30/22 (Mesriani)                     | \$120.00             |
| 9/16/2022          | Case Anywhere        | 4/1-6/30/22 CKS                            | \$132.00             |
|                    | In House             | Postage                                    | \$7.55               |
|                    | In House             | Photocopies (413@.25)                      | \$103.25             |
| <i>Est.</i>        | <i>One Legal</i>     | <i>Final Approval Motion</i>               | <i>\$78.96</i>       |
| <i>Est.</i>        | <i>One Legal</i>     | <i>Final Approval Motion Courtesy Copy</i> | <i>\$83.90</i>       |
| <i>Est.</i>        | <i>Case Anywhere</i> | <i>7/1/22-12/31/22 (CKS)</i>               | <i>\$240.00</i>      |
| <i>Est.</i>        | <i>Case Anywhere</i> | <i>7/1/22-12/31/22 (Mesriani)</i>          | <i>\$240.00</i>      |
|                    | <b>Total:</b>        |                                            | <b>\$13,681.95</b>   |

# **EXHIBIT 5**

## 2014 NLJ Billing Survey

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| Year | Firm Name                                  | Location        | Average FTE Attorneys | Partner Billing Rate High | Partner Billing Rate Low | Partner Billing Rate Avg | Associate Billing Rate High | Associate Billing Rate Low | Associate Billing Rate Avg | Counsel Avg | Counsel Low | Counsel High | NLJ Billing Source                  | Notes                                                                                                                                |
|------|--------------------------------------------|-----------------|-----------------------|---------------------------|--------------------------|--------------------------|-----------------------------|----------------------------|----------------------------|-------------|-------------|--------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Adams and Reese                            | New Orleans, LA | 318                   | \$700.00                  | \$305.00                 | \$420.00                 | \$315.00                    | \$220.00                   | \$270.00                   | \$500.00    | \$425.00    | \$575.00     | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Akerman                                    | Miami, FL       | 523                   | \$880.00                  | \$360.00                 | \$535.00                 | \$465.00                    | \$205.00                   | \$305.00                   |             |             |              | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Akin Gump Strauss Hauer & Feld             | Washington, DC  | 809                   | \$1220.00                 | \$615.00                 | \$785.00                 | \$660.00                    | \$365.00                   | \$525.00                   |             |             |              | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Allen Matkins Leck Gamble Mallory & Natsis | Los Angeles, CA | 181                   | \$680.00                  | \$525.00                 | \$615.00                 |                             |                            |                            |             |             |              | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Alston & Bird                              | Atlanta, GA     | 789                   | \$875.00                  | \$495.00                 | \$675.00                 | \$575.00                    | \$280.00                   | \$425.00                   |             |             |              | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Andrews Kurth                              | Houston, TX     | 337                   | \$1090.00                 | \$745.00                 | \$890.00                 | \$1090.00                   | \$265.00                   | \$670.00                   |             |             |              | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Archer & Greiner                           | Haddonfield, NJ | 194                   | \$460.00                  | \$330.00                 | \$400.00                 | \$295.00                    | \$200.00                   | \$245.00                   |             |             |              | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Arent Fox                                  | Washington, DC  | 330                   | \$860.00                  | \$500.00                 | \$650.00                 | \$595.00                    | \$275.00                   | \$395.00                   |             |             |              | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

## 2014 NLJ Billing Survey

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|      |                                                |                  |      |           |          |          |          |          |          |          |          |          |                                     |                                                                                                                                      |
|------|------------------------------------------------|------------------|------|-----------|----------|----------|----------|----------|----------|----------|----------|----------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Arnall Golden Gregory                          | Atlanta, GA      | 140  | \$520.00  | \$430.00 | \$490.00 |          |          |          |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Arnold & Porter                                | Washington, DC   | 720  | \$950.00  | \$670.00 | \$815.00 | \$610.00 | \$345.00 | \$500.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Arnstein & Lehr                                | Chicago, IL      | 144  | \$595.00  | \$350.00 | \$465.00 | \$350.00 | \$175.00 | \$250.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Baker & Hostetler                              | Cleveland, OH    | 798  | \$670.00  | \$275.00 | \$449.00 | \$350.00 | \$210.00 | \$272.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Baker & McKenzie                               | Chicago, IL      | 4087 | \$1130.00 | \$260.00 | \$755.00 | \$925.00 | \$100.00 | \$395.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Baker, Donelson, Bearman, Caldwell & Berkowitz | Memphis, TN      | 588  | \$495.00  | \$340.00 | \$400.00 | \$465.00 | \$245.00 | \$295.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Ballard Spahr                                  | Philadelphia, PA | 483  | \$650.00  | \$395.00 | \$475.00 | \$495.00 | \$235.00 | \$315.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Barnes & Thornburg                             | Indianapolis, IN | 522  | \$580.00  | \$330.00 | \$480.00 | \$370.00 | \$260.00 | \$320.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Benesch, Friedlander, Coplan & Aronoff         | Cleveland, OH    | 150  | \$635.00  | \$360.00 | \$455.00 | \$475.00 | \$155.00 | \$280.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Best Best & Krieger                            | Riverside, CA    | 176  | \$655.00  | \$340.00 | \$455.00 | \$385.00 | \$235.00 | \$280.00 | \$439.83 | \$340.00 | \$595.00 | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

## 2014 NLJ Billing Survey

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|      |                                 |                  |     |           |          |          |          |          |          |          |          |          |                                     |                                                                                                                                      |
|------|---------------------------------|------------------|-----|-----------|----------|----------|----------|----------|----------|----------|----------|----------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Bingham McCutchen               | Boston, MA       | 795 | \$1080.00 | \$220.00 | \$795.00 | \$605.00 | \$185.00 | \$450.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Blank Rome                      | Philadelphia, PA | 447 | \$940.00  | \$445.00 | \$640.00 | \$565.00 | \$175.00 | \$350.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Bond, Schoeneck & King          | Syracuse, NY     | 198 | \$520.00  | \$240.00 | \$355.00 | \$310.00 | \$160.00 | \$225.00 | \$360.00 | \$275.00 | \$485.00 | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Bowles Rice                     | Charleston, WV   | 140 | \$285.00  | \$165.00 | \$230.00 | \$180.00 | \$115.00 | \$135.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Bracewell & Giuliani            | Houston, TX      | 441 | \$1125.00 | \$575.00 | \$760.00 | \$700.00 | \$275.00 | \$440.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Bradley Arant Boult Cummings    | Birmingham, AL   | 413 | \$605.00  | \$325.00 | \$430.00 | \$340.00 | \$200.00 | \$260.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Broad and Cassel                | Orlando, FL      | 150 | \$465.00  | \$295.00 | \$380.00 |          |          |          |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Brown Rudnick                   | Boston, MA       | 187 | \$1045.00 | \$650.00 | \$856.00 |          |          |          |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Brownstein Hyatt Farber Schreck | Denver, CO       | 214 | \$700.00  | \$310.00 | \$520.00 | \$345.00 | \$265.00 | \$305.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Bryan Cave                      | St. Louis, MO    | 985 | \$900.00  | \$410.00 | \$620.00 | \$595.00 | \$220.00 | \$405.00 | \$635.00 | \$355.00 | \$865.00 | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

## 2014 NLJ Billing Survey

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|      |                                        |                  |     |           |          |          |          |          |          |  |  |  |                                     |                                                                                                                                      |
|------|----------------------------------------|------------------|-----|-----------|----------|----------|----------|----------|----------|--|--|--|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Buchalter Nemer                        | Los Angeles, CA  | 139 | \$695.00  | \$475.00 | \$605.00 | \$375.00 | \$350.00 | \$365.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Burr & Forman                          | Birmingham, AL   | 261 | \$525.00  | \$300.00 | \$371.00 | \$275.00 | \$200.00 | \$241.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Butler Snow                            | Ridgeland, MS    | 280 | \$335.00  | \$235.00 | \$302.00 |          |          |          |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Cadwalader, Wickersham & Taft          | New York, NY     | 437 | \$1050.00 | \$800.00 | \$930.00 | \$750.00 | \$395.00 | \$605.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Carlton Fields                         | Tampa, FL        | 272 | \$840.00  | \$455.00 | \$600.00 |          |          |          |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Cole, Schotz, Meisel, Forman & Leonard | Hackensack, NJ   | 118 | \$730.00  | \$590.00 | \$653.00 | \$340.00 | \$275.00 | \$302.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Connell Foley                          | Roseland, NJ     | 129 | \$575.00  | \$275.00 | \$425.00 | \$325.00 | \$200.00 | \$265.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Cooley                                 | Palo Alto, CA    | 673 | \$990.00  | \$660.00 | \$820.00 | \$640.00 | \$335.00 | \$515.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Covington & Burling                    | Washington, DC   | 760 | \$890.00  | \$605.00 | \$780.00 | \$565.00 | \$320.00 | \$415.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Cozen O'Connor                         | Philadelphia, PA | 495 | \$1135.00 | \$275.00 | \$570.00 | \$640.00 | \$180.00 | \$355.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

## 2014 NLJ Billing Survey

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|      |                                      |                 |      |           |          |           |          |          |          |          |          |          |  |                                     |                                                                                                                                      |
|------|--------------------------------------|-----------------|------|-----------|----------|-----------|----------|----------|----------|----------|----------|----------|--|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Curtis, Mallet-Prevost, Colt & Mosie | New York, NY    | 323  | \$860.00  | \$730.00 | \$800.00  | \$785.00 | \$345.00 | \$480.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Davis Graham & Stubbs                | Denver, CO      | 145  | \$635.00  | \$315.00 | \$435.00  | \$350.00 | \$200.00 | \$255.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Davis Polk & Wardwell                | New York, NY    | 810  | \$985.00  | \$850.00 | \$975.00  | \$975.00 | \$130.00 | \$615.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Debevoise & Plimpton                 | New York, NY    | 595  | \$1075.00 | \$955.00 | \$1055.00 | \$760.00 | \$120.00 | \$490.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Dechert                              | New York, NY    | 845  | \$1095.00 | \$670.00 | \$900.00  | \$735.00 | \$395.00 | \$530.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Dentons                              | New York, NY    | 2503 | \$1050.00 | \$345.00 | \$700.00  | \$685.00 | \$210.00 | \$425.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Dickstein Shapiro                    | Washington, DC  | 254  | \$1250.00 | \$590.00 | \$750.00  | \$585.00 | \$310.00 | \$475.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Dinsmore & Shohl                     | Cincinnati, OH  | 415  | \$850.00  | \$250.00 | \$411.00  | \$365.00 | \$160.00 | \$238.00 | \$360.00 | \$150.00 | \$615.00 |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | DLA Piper                            | New York, NY    | 3962 | \$1025.00 | \$450.00 | \$765.00  | \$750.00 | \$250.00 | \$510.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Dorsey & Whitney                     | Minneapolis, MN | 501  | \$585.00  | \$340.00 | \$435.00  | \$510.00 | \$215.00 | \$315.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

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|      |                                          |                  |     |           |          |           |          |          |          |          |          |           |                                     |                                                                                                                                      |
|------|------------------------------------------|------------------|-----|-----------|----------|-----------|----------|----------|----------|----------|----------|-----------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Duane Morris                             | Philadelphia, PA | 613 | \$960.00  | \$415.00 | \$589.00  | \$585.00 | \$280.00 | \$373.00 | \$638.00 | \$460.00 | \$1015.00 | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Edwards Wildman Palmer                   | Boston, MA       | 540 | \$765.00  | \$210.00 | \$535.00  | \$415.00 | \$245.00 | \$325.00 |          |          |           | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Faegre Baker Daniels                     | Minneapolis, MN  | 673 | \$580.00  | \$355.00 | \$455.00  | \$315.00 | \$110.00 | \$260.00 |          |          |           | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Foley & Lardner                          | Milwaukee, WI    | 844 | \$860.00  | \$405.00 | \$600.00  | \$470.00 | \$210.00 | \$335.00 |          |          |           | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Foley Hoag                               | Boston, MA       | 221 | \$775.00  | \$590.00 | \$670.00  | \$385.00 | \$290.00 | \$325.00 |          |          |           | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Fox Rothschild                           | Philadelphia, PA | 531 | \$750.00  | \$335.00 | \$530.00  | \$500.00 | \$245.00 | \$310.00 |          |          |           | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Fried, Frank, Harris, Shriver & Jacobson | New York, NY     | 450 | \$1100.00 | \$930.00 | \$1000.00 | \$760.00 | \$375.00 | \$595.00 |          |          |           | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Frost Brown Todd                         | Cincinnati, OH   | 414 | \$600.00  | \$220.00 | \$387.00  | \$315.00 | \$150.00 | \$234.00 | \$417.00 | \$350.00 | \$540.00  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Gardere Wynne Sewell                     | Dallas, TX       | 218 | \$775.00  | \$430.00 | \$635.00  | \$330.00 | \$290.00 | \$303.00 |          |          |           | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Gibbons                                  | Newark, NJ       | 201 | \$865.00  | \$440.00 | \$560.00  | \$475.00 | \$295.00 | \$360.00 |          |          |           | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

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|      |                                   |                |      |           |          |          |          |          |          |          |          |          |  |                                     |                                                                                                                                      |
|------|-----------------------------------|----------------|------|-----------|----------|----------|----------|----------|----------|----------|----------|----------|--|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Gibson, Dunn & Crutcher           | New York, NY   | 1154 | \$1800.00 | \$765.00 | \$980.00 | \$930.00 | \$175.00 | \$590.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Gordon Rees Scully Mansukhani     | San Diego, CA  | 478  | \$475.00  | \$375.00 | \$420.00 | \$325.00 | \$285.00 | \$300.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Greenberg Traurig                 | New York, NY   | 1690 | \$955.00  | \$535.00 | \$763.00 | \$570.00 | \$325.00 | \$470.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Harris Beach                      | Rochester, NY  | 198  | \$400.00  | \$298.00 | \$348.00 | \$285.00 | \$175.00 | \$230.00 | \$287.50 | \$175.00 | \$400.00 |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Harter Secrest & Emery            | Rochester, NY  | 132  | \$465.00  | \$300.00 | \$385.00 | \$290.00 | \$195.00 | \$250.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Haynes and Boone                  | Dallas, TX     | 483  | \$1020.00 | \$450.00 | \$670.00 | \$580.00 | \$310.00 | \$405.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Hogan Lovells                     | Washington, DC | 2313 | \$1000.00 | \$705.00 | \$835.00 |          |          |          |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Holland & Hart                    | Denver, CO     | 423  | \$725.00  | \$305.00 | \$442.00 | \$425.00 | \$175.00 | \$277.00 | \$363.00 | \$225.00 | \$535.00 |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Holland & Knight                  | Washington, DC | 956  | \$1085.00 | \$355.00 | \$625.00 | \$595.00 | \$210.00 | \$340.00 | \$575.00 | \$420.00 | \$910.00 |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Honigman Miller Schwartz and Cohn | Detroit, MI    | 231  | \$560.00  | \$290.00 | \$390.00 | \$225.00 | \$205.00 | \$220.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

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|      |                                    |                  |      |          |          |          |          |          |          |          |          |          |                                     |                                                                                                                                      |
|------|------------------------------------|------------------|------|----------|----------|----------|----------|----------|----------|----------|----------|----------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Hughes Hubbard & Reed              | New York, NY     | 351  | \$995.00 | \$725.00 | \$890.00 | \$675.00 | \$365.00 | \$555.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Husch Blackwell                    | St. Louis, MO    | 539  | \$785.00 | \$250.00 | \$449.00 | \$440.00 | \$190.00 | \$275.00 | \$418.00 | \$240.00 | \$625.00 | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Ice Miller                         | Indianapolis, IN | 291  | \$530.00 | \$335.00 | \$450.00 | \$305.00 | \$245.00 | \$270.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Irell & Manella                    | Los Angeles, CA  | 166  | \$975.00 | \$800.00 | \$890.00 | \$750.00 | \$395.00 | \$535.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Jackson Kelly                      | Charleston, WV   | 179  | \$535.00 | \$270.00 | \$345.00 | \$315.00 | \$200.00 | \$243.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Jackson Lewis                      | Los Angeles, CA  | 724  | \$440.00 | \$310.00 | \$380.00 | \$315.00 | \$275.00 | \$290.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Jackson Walker                     | Dallas, TX       | 333  | \$675.00 | \$575.00 | \$622.00 | \$385.00 | \$255.00 | \$335.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Jeffer, Mangels, Butler & Mitchell | Los Angeles, CA  | 125  | \$875.00 | \$560.00 | \$690.00 |          |          |          |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Jenner & Block                     | Chicago, IL      | 434  | \$925.00 | \$565.00 | \$745.00 | \$550.00 | \$380.00 | \$465.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Jones Day                          | New York, NY     | 2464 | \$975.00 | \$445.00 | \$745.00 | \$775.00 | \$205.00 | \$435.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

## 2014 NLJ Billing Survey

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|      |                                     |                 |      |           |          |          |          |          |          |  |  |  |                                     |                                                                                                                                      |
|------|-------------------------------------|-----------------|------|-----------|----------|----------|----------|----------|----------|--|--|--|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Jones Walker                        | New Orleans, LA | 363  | \$425.00  | \$275.00 | \$385.00 | \$240.00 | \$200.00 | \$225.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Kasowitz, Benson, Torres & Friedman | New York, NY    | 372  | \$1195.00 | \$600.00 | \$835.00 | \$625.00 | \$200.00 | \$340.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Katten Muchin Rosenman              | Chicago, IL     | 612  | \$745.00  | \$500.00 | \$615.00 | \$595.00 | \$340.00 | \$455.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Kaye Scholer                        | New York, NY    | 392  | \$1250.00 | \$725.00 | \$860.00 | \$795.00 | \$370.00 | \$597.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Kelley Drye & Warren                | New York, NY    | 293  | \$815.00  | \$435.00 | \$640.00 | \$600.00 | \$305.00 | \$430.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Kilpatrick Townsend & Stockton      | Atlanta, GA     | 561  | \$775.00  | \$400.00 | \$550.00 | \$475.00 | \$315.00 | \$385.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | King & Spalding                     | Atlanta, GA     | 874  | \$995.00  | \$545.00 | \$775.00 | \$735.00 | \$125.00 | \$460.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Kirkland & Ellis                    | Chicago, IL     | 1554 | \$995.00  | \$590.00 | \$825.00 | \$715.00 | \$235.00 | \$540.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Knobbe Martens Olson & Bear         | Irvine, CA      | 260  | \$810.00  | \$450.00 | \$575.00 | \$455.00 | \$305.00 | \$360.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Kramer Levin Naftalis & Frankel     | New York, NY    | 313  | \$1100.00 | \$745.00 | \$921.00 | \$815.00 | \$515.00 | \$675.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

## 2014 NLJ Billing Survey

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|      |                           |                   |      |           |          |          |          |          |          |          |          |          |                                     |                                                                                                                                      |
|------|---------------------------|-------------------|------|-----------|----------|----------|----------|----------|----------|----------|----------|----------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Lane Powell               | Seattle, WA       | 170  | \$675.00  | \$375.00 | \$516.00 | \$425.00 | \$260.00 | \$331.00 | \$477.00 | \$300.00 | \$650.00 | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Latham & Watkins          | New York, NY      | 2060 | \$1110.00 | \$895.00 | \$990.00 | \$725.00 | \$465.00 | \$605.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Lathrop & Gage            | Kansas City, MO   | 283  | \$700.00  | \$285.00 | \$420.00 | \$375.00 | \$195.00 | \$250.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Lewis Roca Rothgerber     | Phoenix, AZ       | 228  | \$695.00  | \$380.00 | \$505.00 | \$525.00 | \$205.00 | \$400.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Lindquist & Vennum        | Minneapolis, MN   | 178  | \$600.00  | \$460.00 | \$520.00 | \$470.00 | \$275.00 | \$365.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Littler Mendelson         | San Francisco, CA | 1002 | \$615.00  | \$395.00 | \$550.00 | \$420.00 | \$245.00 | \$290.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Lowenstein Sandler        | Roseland, NJ      | 261  | \$990.00  | \$600.00 | \$765.00 | \$650.00 | \$300.00 | \$450.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Manatt, Phelps & Phillips | Los Angeles, CA   | 329  | \$795.00  | \$640.00 | \$740.00 |          |          |          |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | McCarter & English        | Newark, NJ        | 371  | \$625.00  | \$450.00 | \$530.00 | \$370.00 | \$220.00 | \$300.00 |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | McDermott Will & Emery    | Chicago, IL       | 1021 | \$835.00  | \$525.00 | \$710.00 |          |          |          |          |          |          | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

## 2014 NLJ Billing Survey

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|      |                                        |                   |      |           |          |          |          |          |          |          |          |          |  |                                     |                                                                                                                                      |
|------|----------------------------------------|-------------------|------|-----------|----------|----------|----------|----------|----------|----------|----------|----------|--|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | McElroy, Deutsch, Mulvaney & Carpenter | Morristown, NJ    | 274  | \$560.00  | \$325.00 | \$445.00 | \$335.00 | \$200.00 | \$295.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | McGuireWoods                           | Richmond, VA      | 931  | \$725.00  | \$450.00 | \$595.00 | \$525.00 | \$285.00 | \$360.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | McKenna Long & Aldridge                | Atlanta, GA       | 518  | \$650.00  | \$480.00 | \$530.00 | \$425.00 | \$375.00 | \$395.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Michael, Best & Friedrich              | Milwaukee, WI     | 189  | \$650.00  | \$235.00 | \$445.00 | \$425.00 | \$200.00 | \$283.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Miles & Stockbridge                    | Baltimore, MD     | 226  | \$740.00  | \$340.00 | \$478.00 | \$425.00 | \$230.00 | \$290.00 | \$419.00 | \$225.00 | \$695.00 |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Moore & Van Allen                      | Charlotte, NC     | 274  | \$870.00  | \$315.00 | \$490.00 | \$430.00 | \$190.00 | \$280.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Morgan, Lewis & Bockius                | Philadelphia, PA  | 1363 | \$765.00  | \$430.00 | \$620.00 | \$585.00 | \$270.00 | \$390.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Morris, Manning & Martin               | Atlanta, GA       | 148  | \$575.00  | \$400.00 | \$480.00 |          |          |          |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Morrison & Foerster                    | San Francisco, CA | 1020 | \$1195.00 | \$595.00 | \$865.00 | \$725.00 | \$230.00 | \$525.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Nelson Mullins                         | Columbia, SC      | 466  | \$800.00  | \$250.00 | \$444.00 | \$395.00 | \$215.00 | \$271.00 | \$376.00 | \$195.00 | \$600.00 |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

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|      |                               |                 |      |           |          |          |          |          |          |          |          |          |  |                                     |                                                                                                                                      |
|------|-------------------------------|-----------------|------|-----------|----------|----------|----------|----------|----------|----------|----------|----------|--|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Nixon Peabody                 | Boston, MA      | 584  | \$850.00  | \$295.00 | \$520.00 | \$550.00 | \$180.00 | \$300.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Norris McLaughlin & Marcus    | Bridgewater, NJ | 128  | \$505.00  | \$485.00 | \$495.00 | \$365.00 | \$185.00 | \$275.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Norton Rose Fulbright         | Houston, TX     | 3537 | \$900.00  | \$525.00 | \$775.00 | \$515.00 | \$300.00 | \$400.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Nossaman                      | Los Angeles, CA | 148  | \$800.00  | \$370.00 | \$579.00 | \$490.00 | \$255.00 | \$340.00 | \$495.00 | \$440.00 | \$550.00 |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Nutter McClennen & Fish       | Boston, MA      | 146  | \$715.00  | \$470.00 | \$575.00 | \$460.00 | \$295.00 | \$375.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Ogletree Deakins              | Atlanta, GA     | 668  | \$650.00  | \$250.00 | \$360.00 | \$365.00 | \$200.00 | \$260.00 | \$315.00 | \$230.00 | \$555.00 |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | O'Melveny & Myers             | Los Angeles, CA | 721  | \$950.00  | \$615.00 | \$715.00 |          |          |          |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Orrick Herrington & Sutcliffe | New York, NY    | 954  | \$1095.00 | \$715.00 | \$845.00 | \$375.00 | \$710.00 | \$560.00 | \$735.00 | \$685.00 | \$850.00 |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Parker Poe Adams & Bernstein  | Charlotte, NC   | 185  | \$500.00  | \$425.00 | \$450.00 |          |          |          |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Paul Hastings                 | New York, NY    | 889  | \$900.00  | \$750.00 | \$815.00 | \$755.00 | \$335.00 | \$540.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

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|      |                                          |                  |      |           |          |           |          |          |          |          |          |          |  |                                     |                                                                                                                                      |
|------|------------------------------------------|------------------|------|-----------|----------|-----------|----------|----------|----------|----------|----------|----------|--|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Paul, Weiss, Rifkind, Wharton & Garrison | New York, NY     | 854  | \$1120.00 | \$760.00 | \$1040.00 | \$735.00 | \$595.00 | \$678.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Pepper Hamilton                          | Philadelphia, PA | 510  | \$950.00  | \$465.00 | \$645.00  | \$525.00 | \$280.00 | \$390.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Perkins Coie                             | Seattle, WA      | 861  | \$1000.00 | \$330.00 | \$615.00  | \$610.00 | \$215.00 | \$425.00 | \$635.00 | \$280.00 | \$800.00 |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Pillsbury Winthrop Shaw Pittman          | Washington, DC   | 591  | \$1070.00 | \$615.00 | \$865.00  | \$860.00 | \$375.00 | \$520.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Polsinelli                               | Kansas City, MO  | 616  | \$775.00  | \$325.00 | \$435.00  | \$350.00 | \$235.00 | \$279.00 | \$376.00 | \$300.00 | \$450.00 |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Proskauer Rose                           | New York, NY     | 712  | \$950.00  | \$725.00 | \$880.00  | \$675.00 | \$295.00 | \$465.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Quarles & Brady                          | Milwaukee, WI    | 422  | \$625.00  | \$425.00 | \$519.00  | \$600.00 | \$210.00 | \$335.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Quinn Emanuel Urquhart & Sullivan        | New York, NY     | 673  | \$1075.00 | \$810.00 | \$915.00  | \$675.00 | \$320.00 | \$410.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Reed Smith                               | Pittsburgh, PA   | 1555 | \$890.00  | \$605.00 | \$737.00  | \$530.00 | \$295.00 | \$420.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Richards, Layton & Finger                | Wilmington, DE   | 124  | \$800.00  | \$600.00 | \$678.00  | \$465.00 | \$350.00 | \$414.00 |          |          |          |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

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|------|----------------------------------------|-------------------|-----|----------|----------|----------|----------|----------|----------|--|--|--|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Riker Danzig Scherer Hyland & Perretti | Morristown, NJ    | 146 | \$495.00 | \$430.00 | \$455.00 | \$295.00 | \$210.00 | \$250.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Robinson & Cole                        | Hartford, CT      | 201 | \$700.00 | \$295.00 | \$500.00 | \$445.00 | \$215.00 | \$300.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Rutan & Tucker                         | Costa Mesa, CA    | 147 | \$675.00 | \$345.00 | \$490.00 | \$500.00 | \$230.00 | \$320.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Saul Ewing                             | Philadelphia, PA  | 240 | \$875.00 | \$375.00 | \$546.00 | \$590.00 | \$225.00 | \$344.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Schiff Hardin                          | Chicago, IL       | 317 |          |          |          | \$415.00 | \$250.00 | \$333.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Sedgwick                               | San Francisco, CA | 342 | \$615.00 | \$305.00 | \$425.00 | \$475.00 | \$250.00 | \$325.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Seward & Kissel                        | New York, NY      | 143 | \$850.00 | \$625.00 | \$735.00 | \$600.00 | \$290.00 | \$400.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Seyfarth Shaw                          | Chicago, IL       | 779 | \$860.00 | \$375.00 | \$610.00 | \$505.00 | \$225.00 | \$365.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Sheppard Mullin Richter & Hampton      | Los Angeles, CA   | 549 | \$875.00 | \$490.00 | \$685.00 | \$535.00 | \$275.00 | \$415.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Shumaker Loop & Kendrick               | Toledo, OH        | 224 | \$595.00 | \$305.00 | \$413.00 | \$330.00 | \$160.00 | \$256.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

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|      |                                      |                |      |           |          |           |          |          |          |          |          |           |  |                                     |                                                                                                                                                                                         |
|------|--------------------------------------|----------------|------|-----------|----------|-----------|----------|----------|----------|----------|----------|-----------|--|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Shutts & Bowen                       | Miami, FL      | 230  | \$660.00  | \$250.00 | \$430.00  | \$345.00 | \$195.00 | \$260.00 |          |          |           |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report                                                    |
| 2014 | Skadden, Arps, Slate, Meagher & Flom | New York, NY   | 1664 | \$1150.00 | \$845.00 | \$1035.00 | \$845.00 | \$340.00 | \$620.00 |          |          |           |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report                                                    |
| 2014 | Snell & Wilmer                       | Phoenix, AZ    | 411  | \$845.00  | \$325.00 | \$525.00  | \$470.00 | \$180.00 | \$280.00 |          |          |           |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report                                                    |
| 2014 | Spilman Thomas & Battle              | Charleston, WV | 131  |           |          |           |          |          |          | \$280.00 | \$215.00 | \$350.00  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report                                                    |
| 2014 | Squire Patton Boggs                  |                |      | \$950.00  | \$350.00 | \$655.00  | \$530.00 | \$250.00 | \$355.00 |          |          |           |  | National Law Journal, December 2014 | Location data not available due to merger in 2014. Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Sterne, Kessler, Goldstein & Fox     | Washington, DC | 122  | \$795.00  | \$450.00 | \$577.00  | \$470.00 | \$265.00 | \$346.00 | \$483.57 | \$450.00 | \$520.00  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report                                                    |
| 2014 | Stevens & Lee                        | Reading, PA    | 154  | \$800.00  | \$525.00 | \$625.00  |          |          |          |          |          |           |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report                                                    |
| 2014 | Stoel Rives                          | Portland, OR   | 365  | \$800.00  | \$300.00 | \$492.00  | \$465.00 | \$205.00 | \$287.00 | \$312.00 | \$280.00 | \$510.00  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report                                                    |
| 2014 | Strasburger & Price                  | Dallas, TX     | 217  | \$690.00  | \$290.00 | \$435.00  | \$365.00 | \$210.00 | \$270.00 | \$475.00 | \$300.00 | \$690.00  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report                                                    |
| 2014 | Stroock & Stroock & Lavan            | New York, NY   | 285  | \$1125.00 | \$675.00 | \$960.00  | \$840.00 | \$350.00 | \$549.00 | \$979.00 | \$745.00 | \$1095.00 |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report                                                    |

## 2014 NLJ Billing Survey

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|      |                               |                  |      |           |          |          |          |          |          |  |  |  |                                     |                                                                                                                                      |
|------|-------------------------------|------------------|------|-----------|----------|----------|----------|----------|----------|--|--|--|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | Taft Stettinius & Hollister   | Cincinnati, OH   | 357  | \$535.00  | \$285.00 | \$415.00 | \$475.00 | \$200.00 | \$285.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Thompson & Knight             | Dallas, TX       | 290  | \$740.00  | \$425.00 | \$535.00 | \$610.00 | \$240.00 | \$370.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Thompson Coburn               | St. Louis, MO    | 317  | \$510.00  | \$330.00 | \$440.00 | \$350.00 | \$220.00 | \$270.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Troutman Sanders              | Atlanta, GA      | 567  | \$975.00  | \$400.00 | \$620.00 | \$570.00 | \$245.00 | \$340.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Ulmer & Berne                 | Cleveland, OH    | 178  | \$415.00  | \$315.00 | \$380.00 |          |          |          |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Varnum                        | Grand Rapids, MI | 133  | \$465.00  | \$290.00 | \$390.00 |          |          |          |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Venable                       | Washington, DC   | 533  | \$1075.00 | \$470.00 | \$660.00 | \$575.00 | \$295.00 | \$430.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Vinson & Elkins               | Houston, TX      | 650  | \$770.00  | \$475.00 | \$600.00 | \$565.00 | \$275.00 | \$390.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Waller Lansden Dortch & Davis | Nashville, TN    | 178  | \$600.00  | \$350.00 | \$460.00 | \$335.00 | \$190.00 | \$245.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Weil, Gotshal & Manges        | New York, NY     | 1157 | \$1075.00 | \$625.00 | \$930.00 | \$790.00 | \$300.00 | \$600.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

## 2014 NLJ Billing Survey

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|      |                                       |                   |      |           |          |          |           |          |          |  |  |  |                                     |                                                                                                                                      |
|------|---------------------------------------|-------------------|------|-----------|----------|----------|-----------|----------|----------|--|--|--|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 2014 | White & Case                          | New York, NY      | 1895 | \$1050.00 | \$700.00 | \$875.00 | \$1050.00 | \$220.00 | \$525.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Wiley Rein                            | Washington, DC    | 277  | \$950.00  | \$550.00 | \$665.00 | \$535.00  | \$320.00 | \$445.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Williams Mullen                       | Richmond, VA      | 233  | \$410.00  | \$360.00 | \$385.00 | \$350.00  | \$260.00 | \$295.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Willkie Farr & Gallagher              | New York, NY      | 526  | \$1090.00 | \$790.00 | \$950.00 | \$790.00  | \$350.00 | \$580.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Wilmer Cutler Pickering Hale and Dorr | Washington, DC    | 988  | \$1250.00 | \$735.00 | \$905.00 | \$695.00  | \$75.00  | \$290.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Winston & Strawn                      | Chicago, IL       | 822  | \$995.00  | \$650.00 | \$800.00 | \$590.00  | \$425.00 | \$520.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Wolff & Samson                        | West Orange, NJ   | 125  | \$450.00  | \$325.00 | \$400.00 | \$450.00  | \$225.00 | \$340.00 |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Womble Carlyle Sandridge & Rice       | Winston-Salem, NC | 492  | \$640.00  | \$470.00 | \$554.00 |           |          |          |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |
| 2014 | Wyatt Tarrant & Combs                 | Louisville, KY    | 202  | \$500.00  | \$280.00 | \$418.00 |           |          |          |  |  |  | National Law Journal, December 2014 | Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report |

## 2014 Associate Class Billing Survey

# **EXHIBIT 6**

**From:** [DIR PAGA Unit](#)  
**To:** [Matthew Atlas](#)  
**Subject:** [External] Thank you for your Proposed Settlement Submission  
**Date:** Friday, March 25, 2022 12:40:40 PM

---

03/25/2022 12:40:11 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to [pagainfo@dir.ca.gov](mailto:pagainfo@dir.ca.gov).

DIR PAGA Unit on behalf of  
Labor and Workforce Development Agency

Website: [https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_labor.ca.gov\\_Private-5FAttorneys-5FGeneral-5FAct.htm&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A\\_Cdp gnVfiiMM&r=CkmVEddukKLexsqU9o1LOYeca1vZAEC-MO6PZ1f0-Jc&m=soDNsbx-FRiT yFeARgGg6fMJGrFMYVvK8akGsnOL3Ro&s=fYLCxVqF0Lf1C1IjpnCxKWXXkZWvv\\_LL3Z\\_TJ\\_jpuil&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__labor.ca.gov_Private-5FAttorneys-5FGeneral-5FAct.htm&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_Cdp gnVfiiMM&r=CkmVEddukKLexsqU9o1LOYeca1vZAEC-MO6PZ1f0-Jc&m=soDNsbx-FRiT yFeARgGg6fMJGrFMYVvK8akGsnOL3Ro&s=fYLCxVqF0Lf1C1IjpnCxKWXXkZWvv_LL3Z_TJ_jpuil&e=)



## Private Attorneys General Act (PAGA) – Filing

### Proposed Settlement of PAGA case

PAGA Number (LWDA-CM-) : \*

*Please enter only the eight digit number after "LWDA-CM-" in the following format, "XXXXXX-XX".  
[Search for PAGA Case number](#)*

***The timing of the deposit of settlement checks is governed by the provisions of the State Administrative Manual. This ministerial, administrative act of depositing a settlement check mandated by state procedures should not be construed as nor does it constitute an unconditional, voluntary and/or absolute acceptance of settlement proceeds or approval of the terms of any settlement agreement or judgment related to that check.***

Your Information (Person Who is Filing)

Your First Name \*

Matthew

Your Last Name \*

Atlas

Your Email Address \*

matlas@ckslaw.com

Your Street Name, Number and Suite/Apt \*

Cohelan Khoury & Singer,

Your Mobile Phone Number

Your City \*

San Diego

Your Work Phone Number

619-595-3001

Your State \*

California

Your Zip/Postal Code \*

92101

## Court and Hearing Information

**Court \***

Los Angeles Superior

**Court Case Number \***

20STCV34691

**Hearing Date (if any)**

05/16/2022

**Hearing Time**

10:00 am

**Hearing Location**

**Number of aggrieved employees \***

604

**Gross settlement amount \***

350500

**Gross penalty amount \***

5000

**Penalties to LWDA \***

3750

**Date of proposed settlement \***

05/16/2022

## Proposed Settlement and Other Documents

**Proposed Settlement \***

1. NOM.pdf

**Other Attachment (if any)**

2. P's & A's.pdf

**Other Attachment (if any)**

[Remove](#)

3. Khoury Dec.pdf

**Other Attachment (if any)**

[Remove](#)

4. Mesriani Dec.pdf

**Other Attachment (if any)**

[Remove](#)

5. Lopez Dec.pdf

**Other Attachment (if any)**

[Remove](#)

6. Bui Dec.pdf

**Other Attachment (if any)**

[Remove](#)

7. Order.pdf

[Add Another Attachment](#)

Should you have questions regarding this online form, please contact [PAGAInfo@dir.ca.gov](mailto:PAGAInfo@dir.ca.gov)

**IMPORTANT NOTICE OF REDACTION RESPONSIBILITY:** All filers must redact: Social Security or taxpayer identification numbers; personal addresses, personal telephone numbers, personal email addresses, dates of birth; names of minor children; & financial account numbers. This requirement applies to all documents, including attachments.

☒ **I understand that, if I file, I must comply with the redaction rules consistent with this notice.**

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# **EXHIBIT 7**