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Attorneys for Plaintiff, and all others
similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO – CENTRAL**

LIZBETH GARCIA, on behalf of herself
and all others similarly situated,

Plaintiffs,
v.

THE BAY CLUBS COMPANY, LLC; and
DOES 1 through 50, inclusive.

Defendants.

CASE NO.: 37-2018-00029247-CU-OE-CTL

**DECLARATION OF WILLIAM M. TURNER
IN SUPPORT OF PLAINTIFFS' UNOPPOSED
EX PARTE APPLICATION FOR APPROVAL
OF PAGA SETTLEMENT**

Date: March 8, 2022
Time: 8:30 a.m.
Judge: Hon. Gregory W. Pollack
Dept: C-71
Complaint Filed: June 13, 2018
Trial Date: January 14, 2022

*[filed concurrently with Plaintiff Lizbeth Garcia's
Notice of Unopposed Ex Parte Application;
Plaintiff's Unopposed Ex Parte Application
Declaration of Jeffrey L. Hogue; Declaration of
Devon K. Roepcke; Declaration of Ernesto
Sanchez; Declaration of Lizbeth Garcia;
Declaration of Jeyson Pineda; Declaration of
Patricia Calderon; Declaration of Caroline
Salazar; Notice of Lodgment; Proposed Order;
Proposed Judgement; Request for Judicial Notice]*

1 I, William M. Turner, declare that:

2 1. I am an attorney at law duly licensed to practice before all courts of the State of
3 California, and I am a Partner of Turner Dhillon LLP, counsel for Plaintiff Carolina Salazar in *Carolina*
4 *Salazar v. The Bay Clubs, LLC*, L.A.S.C. Case No. YC073022 (the “Salazar Action”). I have personal
5 knowledge of the facts stated herein, except for those stated on the basis of information or belief, which
6 I believe to be true.

7 2. On or about May 14, 2018, plaintiff Salazar transmitted her letter to the LWDA
8 outlining various labor code violations, including, but not limited to: (1) failure to pay all wages earned,
9 including overtime pay, within their respective pay period, in violation of Labor Code § 204; § 510,
10 and § 3(A) of IWC Wage Order 4-2001; (2) failure to pay all wages owed upon discharge or resignation
11 in violation of Labor Code §§ 201 and 202; (3) failure to provide accurate wage statements as required
12 by Labor Code § 226; (4) failure to pay for missed meal and rest periods in violation of Labor Code §
13 226.7, § 512 and §§ 11 and 12 of IWC Wage Order 4-2001; (5) failure to reimburse for their expenses
14 incurred in discharge of their duties, in violation of Labor Code § 2802; and (6) failure to provide a
15 written agreement setting forth how her commissions were computed and paid, in violation of Labor
16 Code section 2751. On July 19, 2018, Salazar filed her individual and PAGA civil complaint against
17 Defendant for the Labor Code violations described in her letter to the LWDA. Plaintiff’s rest break
18 claim, which was part of her fourth cause of action, was based on Defendant’s failure to provide her
19 and other non-exempt aggrieved employees timely and uninterrupted rest breaks. Plaintiff was part of
20 the membership sales group, and she and others were expected to be “on call” while on her rest breaks.
21 Her attempts to take rest breaks were constantly interrupted by her own supervisors to address
22 customers onsite. Defendant’s Bay Clubs’ written rest break policies, which were in effect during the
23 entire Salazar PAGA period, fail to comply strictly with California’s rest period requirements with
24 respect to when the first meal break is triggered. The DLSE states in the language cited to above that
25 “A rest period is not required for employees whose total daily work time is less than three and one-half
26 hours.” Thus, according to the DLSE, if an employee works from 0 – 3.4 hours, which is less “less
27 than three and one-half hours,” they would not be entitled to rest break. According to the chart
28

1 contained in Bay Clubs' written policies, if an employee worked exactly 3.5 hours, they would not be
2 entitled to the first rest break. The Bay Clubs' potential liability for this violation is a penalty in the
3 amount of \$100 or \$200 per pay period per employee from May 14, 2017 to the date of the proposed
4 settlement.

5 3. Shortly after Plaintiff Salazar filed her complaint, she propounded written
6 discovery upon Defendants. Defendants failed to respond to Plaintiff Salazar's written discovery,
7 forcing Plaintiff Salazar to file a motion to compel and for sanctions, which was granted. Defendants
8 did not comply with the discovery and sanctions order, forcing Plaintiff Salazar to file a motion to
9 compel compliance with the order.

10 4. On January 8, 2020, Defendants filed a motion to compel Plaintiff Salazar to
11 arbitrate her individual claims and for a stay of her PAGA claims pending arbitration of Plaintiff
12 Salazar's individual claims; however, much of the discovery (including a PMQ deposition) in the
13 arbitration constituted discovery for Plaintiff Salazar's individual claims and her PAGA claims. On
14 January 17, 2020, the parties filed a joint stipulation for a stay of the PAGA claims while Plaintiff
15 Salazar prosecuted her individual claims by way of arbitration.

16 5. Plaintiff Salazar and Defendants ultimately settled her individual claims. They
17 notified the court of the settlement, and, on November 9, 2020, the stay of Plaintiff Salazar's PAGA
18 claims was lifted.

19 6. After the stay was lifted, Plaintiff Salazar noticed the deposition of Defendants'
20 person most qualified (PMQ) to testify concerning several topics. Defendants failed to produce a PMQ,
21 forcing Plaintiff Salazar to file a motion to compel and for sanctions. Shortly before the hearing on the
22 motion to compel and for sanctions, Defendants stipulated to produce a PMQ on a date certain.

23 7. Plaintiff Salazar then named as Doe defendants two principals for Defendants.
24 These two individual Defendants demurred and their demurrer was sustained. Pursuant to the parties'
25 Stipulation, the Court continued the trial to February 8, 2022.

26 8. Meanwhile, Plaintiff Salazar's counsel was working cooperatively with counsel
27 for Plaintiffs Garcia, Pineda, and Klipa to prevent a reverse auction and to negotiate a settlement of the
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1 PAGA actions that is favorable to the aggrieved employees and the State of California.

2 9. The collective, cooperative parties and attorneys involved in the four actions
3 participated in mediation on October 1, 2021, with Hon. Lisa Cole (Ret.). Phillips' counsel took the
4 lead. The cases did not settle at the mediation. The parties continued to negotiate after the mediation
5 both with and without Judge Cole's involvement.

6 10. Reaching a global settlement for the Actions was no easy feat. In addition to the
7 fact that the PAGA claim was composed of multiple actions and their counsel - each in different states
8 of development - there were pending individual claims as well in arbitration. Overall, there were
9 approximately 28 parties and their counsel that had to agree to the settlement. Part of the challenge in
10 mediating the Actions is that they involved 23 pending arbitrations. In mediation, Defendants were
11 adamant that they wanted to buy their peace and resolve all the arbitrations. So, in a separate settlement
12 agreement these 23 arbitrations were resolved.

13 11. On January 21, 2021, the parties ultimately reached a global settlement in
14 principle and thereafter negotiated and entered into a Memorandum of Understanding (MOU).

15 12. The MOU was further negotiated into a long form settlement agreement entitled
16 "Private Attorney General Act Settlement Agreement" which was not fully executed until February 16,
17 2022, as well as an arbitration settlement agreement concerning the 23 parties.

18 13. Based on the sufficient data that Defendants provided as well as my experience
19 with valuing PAGA settlements, I endorse the settlement reached in this action. It was reached after
20 thoroughly and carefully evaluating all available data, and was commensurate with the risks and
21 benefits on both sides. The settlement was reached upon both sides exchanging and evaluating ample
22 discovery sufficient for each party to have a realistic understanding of the monetary exposure. It is my
23 opinion, the PAGA Settlement reached in this case was fair, just, and served the statute's stated
24 objective of ensuring "genuine and meaningful" penalties. Plaintiffs' counsel in the Actions were well
25 versed in the area of PAGA related wage and hour litigation, and defense counsel was well versed in
26 PAGA related wage and hour litigation as well.

1 14. Further, the proposed settlement here by far exceeded the proposed settlement
2 agreement in the Nichols Action, which the Superior Court in San Francisco denied as inadequate. The
3 plaintiff in the Nichols Action top-filed the instant action, and then tried to reverse auction the other
4 four actions. The plaintiff in the Nichols Action tried to conceal the fact that there were four other
5 actions against Defendant. Although the plaintiff in the Nichols Action was a hybrid action, with the
6 plaintiff settling his individual claims through arbitration, if the proposed PAGA Settlement was
7 approved, it would have released all the claims of the other four PAGA actions. Plaintiffs had to
8 successfully intervene into the Nichols Action to thwart any subsequent attempts at a proposed
9 settlement agreement releasing all the claims of the other four PAGA actions.

10 15. The Aggrieved Employees potentially could have reached a more favorable
11 result at trial. Based on the constant changes in this complex area of the law, however, any potential
12 more favorable verdict would inevitably be appealed, and that would mean either long delays or a
13 potential retrial. Collectability of any judgment was an important consideration. Entering into a
14 settlement now would mean a positive outcome with millions of dollars transferring to the LWDA and
15 the Aggrieved Employees.

16 16. I and other attorneys at Turner Dhillon LLP are experienced in both prosecuting
17 and defending class actions, mass actions, group actions, and other complex litigation. Examples of
18 such cases are: *Dall v. Post Alarm Systems*, L.A.S.C. Case No. BC598528 (wage and hour class action);
19 *Sanchez v. Pierre Landscape, Inc.*, L.A.S.C. Case No. BC613747 (wage and hour class action); *Loftus*
20 *v. Ferguson Enterprises, Inc.*, L.A.S.C. Case No. BC403691 (wage and hour class action); *Holzer v.*
21 *Wedbush Securities, Inc.*, L.A.S.C. Case No. BC550462 (wage and hour class action); *Semprini v.*
22 *Wedbush Securities, Inc.*, O.C.S.C. Case No. 30-2015-00776114-CU-OE-CXC (wage and hour class
23 action) *Lee v. A.T.&T. Wireless*, L.A.S.C. Case No. BC 326118 (class action); *Boyd v. A.T. & T.*
24 *Wireless*, L.A.S.C. Case No. BC 374057 (class action); *Pyne v. Enterprise Rent-A-Car Company*,
25 L.A.S.C. Case No. BC 264636 (Pre-Proposition 64 representative action); *CAD/CAM Publishing, Inc.*
26 *v. Archer*, S.D.S.C. Case No. GIC 756904 (class action); *Anderson v. Tropicana Products, Inc.*,
27 U.S.D.C. Case No. SA CV99-352 GLT (EEx) (mass action); *Securities Investor Protection v. Vigman*,
28

U.S.D.C. Case No. CV 83-4742-AWT (Tx) (multiple class actions); *Anderson v. Selectivend, Inc.*, L.A.S.C. Case No. BC 267262 (class action); *Smith v. Titan/Value Equities Group, Inc.*, O.C.S.C. Case No. 705129 (class action); *Marler v. E.M. Johansing, LLC*, V.C.S.C. Case No. 56-2009-00361106 (class action); *Coleman v Platinum Group of Companies, Inc.*, L.A.S.C. Case No. BC521784; as well as several other class action and representative action lawsuits.

17. This case involved a substantial amount of work hours, which included: communicating with scores of aggrieved employees, including face-to-face meetings throughout California; investigating the facts; researching claims; reviewing and analyzing a motion to compel arbitration; drafting and filing administrative and civil complaints; meeting and consulting with opposing counsel to discuss the case and conduct case management conferences; propounding numerous sets of written discovery; reviewing Defendant's production of documents, including, among other things, time records, wage statements, and employee personnel documentation; taking the deposition of Defendant's persons most qualified; working on the mediation brief and participating in a full day of mediation; drafting discovery motions; attending frequent court hearings; conducting extensive legal research; and performing various other tasks necessary to produce the benefit this Settlement brings to the State of California and the Aggrieved Employees.

18. The hourly rates for Turner Dhillon LLP's attorneys and paralegals in this case range from \$175-\$225 for paralegals, \$250-\$475 for associate attorneys, and \$495-\$850 for partners, as follows:

Salazar Action				
Timekeeper	Admin Year	Rates	Hours Spent	Total Billed
William M. Turner (Attorney)	1998	\$850	36.20	\$30,770.00
Asha Dhillon (Attorney)	1999	\$795	115.20	\$91,584.00
Catherine L. Dellecker (Attorney)	1999	\$675	0.20	\$135.00
Christina M. Le (Attorney)	2005	\$625	334.50	\$209,062.50
Kasumi T. Roddick (Attorney)	2007	\$600	6.60	\$3,960.00
Neil M. Katsuyama (Attorney)	2010	\$575	22.60	\$12,995.00
Angela G. Anderson (Attorney)	2015	\$400	15.70	\$6,280.00
Arsalan Ibnalnasir (Attorney)	2016	\$375	0.60	\$225.00
Elizabeth N. Bethel (Paralegal)		\$250	8.0	\$2,000.00

Jin Lee (Paralegal)		\$175	472.50	\$82,687.50
Caroline M. Tonarely (Paralegal)		\$175	2.60	\$455.00
Turner Dhillon LLP Total Fees =			1,014.70	\$440,154.00

19. As of February 25, 2022, Turner Dhillon LLP has advanced expenses for the PAGA claims in the amount of \$6,710.20. Therefore, Turner Dhillon LLP's total invested in this PAGA action is **\$446,864.20** (\$440,154.00 + \$6,710.20).

20. Turner Dhillon LLP has advanced their legal services and all costs in this litigation. Particularly for small firms like Turner Dhillon LLP, this loan of legal services and these expenses are a serious financial burden. Being small firms, the time required for Turner Dhillon LLP to prosecute this case precluded them counsel from undertaking other work, including no-risk hourly work. In so doing, Turner Dhillon LLP sacrificed income to prosecute this public interest class action with the reasonable expectation that they would be appropriately rewarded if they achieved a good result.

21. A true and correct copy of my firm's cost bill is attached as Exhibit "A."

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 3, 2022.


 William M. Turner

Exhibit “A”

Selection Criteria	
Slip Classification	Open
Clie. Selection	Include: SALAZAR, C. - THE BAY CLUB
Slip Slip Type	Expense

Rate Info - identifies rate source and level

Slip ID			Timekeeper	Units	Rate	Slip Value
Dates and Time			Activity	DNB Time	Rate Info	
Posting Status			Client	Est. Time	Bill Status	
Description			Reference	Variance		
27173	EXP		OFFICE	1	19.00	19.00
12/8/2017			Copying			
Billed	G:13600	1/11/2018	SALAZAR, C. - THE B			
Mark Koorennny	- Copying costs for personnel file					
27174	EXP		OFFICE	1	7.39	7.39
12/12/2017			Postage			
Billed	G:13600	1/11/2018	SALAZAR, C. - THE B			
Fed Ex	- Postage for copy of personnel file					
33011	EXP		OFFICE	1	150.00	150.00
5/14/2018			Other			
Billed	G:14193	6/15/2018	SALAZAR, C. - THE B			
LWDA - PAGA	Notice					
34010	EXP		OFFICE	1	2.52	2.52
4/30/2018			Online researc			
Billed	G:14193	6/15/2018	SALAZAR, C. - THE B			
Online research						
34036	EXP		OFFICE	173	0.20	34.60
5/31/2018			Copying			
Billed	G:14193	6/15/2018	SALAZAR, C. - THE B			
Copying						
34183	EXP		OFFICE	1	74.82	74.82
5/31/2018			Online researc			
Billed	G:14193	6/15/2018	SALAZAR, C. - THE B			
Online research						
34467	EXP		OFFICE	1	250.00	250.00
6/6/2018			Other			
Billed	G:14521	7/5/2018	SALAZAR, C. - THE B			
JAMS - Initial Filing Fee						
36924	EXP		OFFICE	1	507.85	507.85
7/30/2018			Litigation support vendo			
Billed	G:14708	8/6/2018	SALAZAR, C. - THE B			
Nationwide Legal - Documents: SUMMONS;	COMPLAINT; CIVIL CASE COVER SHE...					

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JONES, BELL, ABBOTT, FLEMING & FITZGERALD L.L.P.
Slip Listing

Page 2

Slip ID			Timekeeper	Units	Rate	Slip Value
Dates and Time			Activity	DNB Time	Rate Info	
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Description			Reference	Variance		
37459	EXP		OFFICE	1	98.25	98.25
7/27/2018			Litigation support vendo			
Billed	G:14970	9/10/2018	SALAZAR, C. - THE B			
Nationwide Legal - S&C, CCCS, ETC (THE BAY CLUB COMPANY, LLC)						
37460	EXP		OFFICE	1	64.25	64.25
7/27/2018			Litigation support vendo			
Billed	G:14970	9/10/2018	SALAZAR, C. - THE B			
Nationwide Legal - S&C, CCCS, ETC (Bay Club Los Angeles, Inc.)						
37489	EXP		OFFICE	1	28.12	28.12
7/31/2018			Litigation support vendo			
Billed	G:14970	9/10/2018	SALAZAR, C. - THE B			
LexisNexis - July 2018						
37501	EXP		OFFICE	1	13.32	13.32
7/31/2018			Litigation support vendo			
Billed	G:14970	9/10/2018	SALAZAR, C. - THE B			
LexisNexis - July 2018						
37691	EXP		OFFICE	1	40.00	40.00
8/10/2018			Litigation support vendo			
Billed	G:14970	9/10/2018	SALAZAR, C. - THE B			
Nationwide Legal - PROOF OF SERVICE OF SUMMONS (2 ORIGINALS) (Torrance Superior Courthouse)						
40388	EXP		OFFICE	1	10.00	10.00
10/8/2018			Litigation support vendo			
Billed	G:15326	11/12/2018	SALAZAR, C. - THE B			
Nationwide Legal - Inv 180296 (9/21/18): 9/21/18 - PROOF OF SERVICE OF NOTICE OF CASE REASS \ TORRANCE SUPERIOR COURTHOUSE						
46358	EXP		OFFICE	1	69.00	69.00
1/31/2019			Litigation support vendo			
Billed	G:15788	2/13/2019	SALAZAR, C. - THE B			
Nationwide Legal - Inv 181905 (12/07/18): 12/07/18 - CASE MANAGEMENT STATEMENT \ LASC - TORRANCE COURTHOUSE						
48144	EXP		OFFICE	1	8.15	8.15
2/1/2019			Litigation support vendo			
Billed	G:16033	3/11/2019	SALAZAR, C. - THE B			
Nationwide Legal - Inv 186481 (1/11/19): 1/11/19 - NOTICE OF RULING \ TORRANCE COURTHOUSE						

Slip ID	Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Info Bill Status	Slip Value
48177	EXP 2/1/2019 Billed Nationwide Legal - Inv 186400 (1/04/19): 1/02/19 - NTC OF CASE REASSIGNMENT \ LASC - TORRANCE SUPERIOR COURTHOUSE	OFFICE Litigation support vendo SALAZAR, C. - THE B	1	8.15	8.15
50019	EXP 3/15/2019 Billed Nationwide Legal - Inv 189719: 3/11/19 - MTCX4 FILE/CONFORM/RETURN \ LASC CENTRAL	OFFICE Litigation support vendo SALAZAR, C. - THE B	1	60.60	60.60
50082	EXP 3/12/2019 Billed LA Court eFile - Reservation ID 213863396996: MOTION TO COMPEL DISCOVERY (NOT FURTHER DISCOVERY) - 1 MOVING PARTY, 1 MOTION	OFFICE Litigation support vendo SALAZAR, C. - THE B	1	123.30	123.30
50083	EXP 3/12/2019 Billed LA Court eFile - Reservation ID 732236813846: MOTION TO COMPEL DISCOVERY (NOT FURTHER DISCOVERY) - 1 MOVING PARTY, 1 MOTION	OFFICE Litigation support vendo SALAZAR, C. - THE B	1	123.30	123.30
50495	EXP 4/12/2019 Billed FedEx - Inv 6-519-84735: Apr 02, 2019 - PRIORITY OVERNIGHT ENVELOPE \ MARK KOORENNY, ESQ.	OFFICE Postage SALAZAR, C. - THE B	1	9.27	9.27
51120	EXP 4/5/2019 Billed Nationwide Legal - Inv 191324: 4/02/19 - NOTICE OF NON-OPPOSITION TO MOTIONS TO C \ TORRANCE SUP CTH	OFFICE Litigation support vendo SALAZAR, C. - THE B	1	37.65	37.65
51123	EXP 4/5/2019 Billed Nationwide Legal - Inv 191324: 4/02/19 - NOTICE OF NON-OPPOSITION TO MOTIONS TO C \ TORRANCE SUP CTH	OFFICE Litigation support vendo SALAZAR, C. - THE B	1	85.00	85.00

1/12/2022
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JONES, BELL, ABBOTT, FLEMING & FITZGERALD L.L.P.
Slip Listing

Page 4

Slip ID			Timekeeper	Units	Rate	Slip Value
Dates and Time			Activity	DNB Time	Rate Info	
Posting Status			Client	Est. Time	Bill Status	
Description			Reference	Variance		
51467	EXP		OFFICE	1	124.00	124.00
4/23/2019			Litigation support vendo			
Billed	G:16414	5/9/2019	SALAZAR, C. - THE B			
Court Call - ID 9750357: TRIAL SETTING CONFERENCE						
51581	EXP		OFFICE	1	85.00	85.00
4/12/2019			Litigation support vendo			
Billed	G:16414	5/9/2019	SALAZAR, C. - THE B			
Nationwide Legal - Inv 191996: 4/09/19 - CONFORMED COPY OF "PROOF OF SERVICE OF S \ TORRANCE SUP CT						
51660	EXP		OFFICE	1	124.00	124.00
4/8/2019			Litigation support vendo			
Billed	G:16414	5/9/2019	SALAZAR, C. - THE B			
Court Call - ID 9718700: MOTION						
58321	EXP		OFFICE	1	94.00	94.00
8/19/2019			Litigation support vendo			
WIP			SALAZAR, C. - THE B			
Court Call - 9899336						
59550	EXP		OFFICE	1	4.00	4.00
9/17/2019			Court fees			
WIP			SALAZAR, C. - THE B			
LA County Superior Court - CASE DOCUMENT IMAGES YC073022 : 4/9/2019 - MINUTE ORDER						
59771	EXP		OFFICE	1	13.65	13.65
9/27/2019			Litigation support vendo			
WIP			SALAZAR, C. - THE B			
Nationwide Legal - Inv 12292: 9/25/19 - E-FILING \ LASC						
59772	EXP		OFFICE	1	37.65	37.65
9/27/2019			Litigation support vendo			
WIP			SALAZAR, C. - THE B			
Nationwide Legal - Inv 12292: 9/18/19 - NOTICE OF RULING \ LASC						
60665	EXP		KKF	1	9.24	9.24
10/25/2019			Postage			
WIP			SALAZAR, C. - THE B			
FedEx - Inv 6-779-42534: Oct 18, 2019 - PRIORITY OVERNIGHT ENVELOPE \ MARY KOORENNY , ESQ.						
60666	EXP		KKF	1	9.24	9.24
10/25/2019			Postage			
WIP			SALAZAR, C. - THE B			

1/12/2022
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JONES, BELL, ABBOTT, FLEMING & FITZGERALD L.L.P.
Slip Listing

Page 5

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
FedEx - Inv 6-779-42534: Oct 18, 2019 - PRIORITY OVERNIGHT ENVELOPE \ JEFFREY R. RANEN/MEGHAN MCCORD					
60978	EXP	OFFICE	1	21.00	21.00
10/4/2019		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 12473: 9/30/19 - COURTESY COPIES TO DEPT. B. \ TORRANCE SUP CT					
61057	EXP	OFFICE	1	85.00	85.00
10/25/2019		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 12909: 10/18/19 - COURTESY COPY PDF \ TORRANCE SUPERIOR COURT					
61058	EXP	OFFICE	1	13.65	13.65
10/25/2019		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 12909: 10/15/19 - COURTESY COPY PDF \ LASC					
61503	EXP	OFFICE	1	20.00	20.00
11/17/2019		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Deadlines on Demand - Case deadline (May 2019)					
62452	EXP	OFFICE	1	37.65	37.65
11/29/2019		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 12086 (9/30/2019): 9/4/19 - REQUEST FOR DISMISSAL \ LASC					
65429	EXP	OFFICE	1	45.00	45.00
1/6/2020		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Deadlines.com					
65471	EXP	OFFICE	1	30.00	30.00
1/1/2020		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Deadlines.com : 12/05/19					
66787	EXP	OFFICE	1	45.00	45.00
2/1/2020		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Deadlines on Demand					

1/12/2022
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JONES, BELL, ABBOTT, FLEMING & FITZGERALD L.L.P.
Slip Listing

Page 6

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
72561	EXP	OFFICE	1	94.00	94.00
7/9/2020		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Court Call - 10707262: LASC \ JUDGE DEIRDRE HILL (VC)					
76425	EXP	OFFICE	1	17.50	17.50
10/16/2020		Postage			
WIP		SALAZAR, C. - THE B			
FedEx - Inv 7-153-49647:					
Oct 13, 2020 - CAROLINA SALAZAR					
76475	EXP	OFFICE	1	67.65	67.65
10/16/2020		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 22212:					
10/13/2020 - JOINT STIPULATION LIFTING STAY ORDER AND (PROPOSED) ORDER \ TORRANCE SUP CT					
79314	EXP	OFFICE	1	38.15	38.15
12/4/2020		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 24156:					
11/30/2020 - CASE MANAGEMENT STATEMENT \ TORRANCE SUP CT					
79510	EXP	OFFICE	1	15.00	15.00
12/16/2020		Court fees			
WIP		SALAZAR, C. - THE B			
LA Court Connect - YC073022: CASE MANAGEMENT CONFERENCE \ 12/11/2020 8:30 AM					
80725	EXP	OFFICE	1	20.00	20.00
1/1/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Deadlines on Demand					
83430	EXP	OFFICE	1	61.65	61.65
3/25/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
LA Court eFile - 637931182721: MOTION TO COMPEL DISCOVERY (NOT FURTHER DISCOVERY) - 1 MOVING PARTY, 1 MOTION \ 04/21/2021 8:30 AM					
85832	EXP	OFFICE	1	12.97	12.97
4/2/2021		Postage			
WIP		SALAZAR, C. - THE B			
FedEx - Inv 7-327-19253:					

1/12/2022
4:33 PM

JONES, BELL, ABBOTT, FLEMING & FITZGERALD L.L.P.
Slip Listing

Page 7

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
Mar 26, 2021 - MARK KOORENNY, ESQ.					
85833	EXP	OFFICE	1	9.65	9.65
4/2/2021		Postage			
WIP		SALAZAR, C. - THE B			
FedEx - Inv 7-327-19253:					
Mar 26, 2021 - JEFFREY RANEN, ESQ./SONA PATEL					
85847	EXP	OFFICE	1	38.15	38.15
4/2/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 28307:					
3/26/2021 - 1) NOTICE OF MOTION AND MOTION					
TO COMPEL DEFENDANT THE BAY CLUBS					
COMPANY, LLC'S PERSON(S) \ TORRANCE					
SUPERIOR COURT					
85867	EXP	OFFICE	1	38.15	38.15
4/16/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 28776:					
4/12/2021 - NOTICE OF NON-OPPOSITION TO					
MOTION TO COMPEL \ TORRANCE SUPERIOR					
COURT					
85868	EXP	OFFICE	1	58.75	58.75
4/16/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 28776:					
4/15/2021 - STIPULATION AND PROPOSED					
ORDER RE THE DEPOSITION OF DEFT. THE					
BAY CLUB COMPANY, LLC PERSON \					
TORRANCE SUPERIOR COURT					
87297	EXP	OFFICE	1	1264.94	1264.94
5/6/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Veritext - Inv 4990217:ORIGINAL WITH 1					
CERTIFIED TRANSCRIPT \ ERIN RUCKER OTO					
90352	EXP	OFFICE	1	34.20	34.20
7/9/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 31695:					
7/1/2021 - AMENDMENT TO COMPLAINT RE:					
DOE 1; DOE 2; DOE 3 \ TORRANCE SUP CT					
90678	EXP	OFFICE	1	14.15	14.15
7/30/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			

1/12/2022
4:33 PM

JONES, BELL, ABBOTT, FLEMING & FITZGERALD L.L.P.
Slip Listing

Page 8

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
Nationwide Legal - Inv 32711: 7/30/2021 - NOTICE OF NAME EXTENSION \ TORRANCE SUP CT					
92121	EXP	OFFICE	1	43.05	43.05
8/13/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 33157: 8/11/2021 - REPLY TO OPPOSITION TO MOTION TO INTERVENE IN THE PAGA ACTION BY LIZBETH GARCIA, CAROLINA \ SFSC					
92155	EXP	OFFICE	1	15.74	15.74
8/20/2021		Postage			
WIP		SALAZAR, C. - THE B			
FedEx - Inv 7-474-83772: Aug 11, 2021 - SETH NEULIGHT / HILLARY J. BAC					
92156	EXP	OFFICE	1	9.83	9.83
8/20/2021		Postage			
WIP		SALAZAR, C. - THE B			
FedEx - Inv 7-474-83772: Aug 11, 2021 - ALEJANDRO P. GUTIERREZ					
92157	EXP	OFFICE	1	11.67	11.67
8/20/2021		Postage			
WIP		SALAZAR, C. - THE B			
FedEx - Inv 7-474-83772: Aug 11, 2021 - FRED W. GERBINO, JR.					
92321	EXP	OFFICE	1	2025.00	2025.00
8/30/2021		Arbitrators/mediators			
WIP		SALAZAR, C. - THE B			
Signature Resolution - Inv 24832: ONE TIME ADMINISTRATIVE FEE, 1/8 OF FULL DAY MEDIATION (14 HOURS TOTAL: 8 HOURS HEARING, 6 HOURS PREP)					
92681	EXP	OFFICE	1	34.20	34.20
8/27/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 33240: 8/24/2021 - NOTICE OF ENTRY OF JUDGMENT OR ORDER \ TORRANCE SUP CT					
92682	EXP	OFFICE	1	34.20	34.20
8/27/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 33240: 8/25/2021 - PROOF OF SERVICE OF SUMMONS RE: DOE 1, DOE 2 & DOE 3 \ TORRANCE SUP CT					

1/12/2022
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JONES, BELL, ABBOTT, FLEMING & FITZGERALD L.L.P.
Slip Listing

Page 9

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
93886	EXP	OFFICE	1	25.00	25.00
9/30/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Deadlines on Demand: AUTOMATED LEGAL CALENDARING					
95601	EXP	OFFICE	1	39.20	39.20
10/30/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 35947:					
10/26/2021 - NOTICE OF RULING \ TORRANCE SUP CT					
96823	EXP	OFFICE	1	17.00	17.00
11/1/2021		Outside printing			
WIP		SALAZAR, C. - THE B			
Los Angeles Superior Court - PMT608941:					
OPPOSITION TO MOTION RE-DEMURRER TO 4TH AMENDED C					
96824	EXP	OFFICE	1	8.60	8.60
11/1/2021		Outside printing			
WIP		SALAZAR, C. - THE B			
Los Angeles Superior Court - 2055489: PLAINTIFFS ARTURO VEGA AND UNTA KEY'S OPPOSITION TO DEF OHANESSIAN'S DEMURRER TO CONSOLIDATED COMPLAINT, MINUTE ORDER					
96869	EXP	OFFICE	1	39.20	39.20
11/12/2021		Litigation support vendo			
WIP		SALAZAR, C. - THE B			
Nationwide Legal - Inv 36404:					
11/5/2021 - OPPOSITION TO DEMURRER \ TORRANCE SUP COURT					
Grand Total					
		Billable	0.00		6710.22
		Unbillable	0.00		0.00
		Total	0.00		6710.22