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Attorneys for Plaintiffs, RAMON HUERTA,
ANTONIO DIAZ, FELICIANO BERNABE BARRIOS,
JUAN CARLOS MORENO LOPEZ, and NORBERTO
HUERTA-MARTINEZ, as individuals and on behalf of
themselves and all others similarly situated and aggrieved

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF FRESNO

RAMON HUERTA, an individual; ANTONIO
DIAZ, an individual; FELICIANO BERNABE
BARRIOS, an individual; JUAN CARLOS
MORENO LOPEZ, an individual;
NORBERTO HUERTA-MARTINEZ, an
individual; and on behalf of all others similarly
situated and aggrieved,

Plaintiffs,

v.

BATTH FARMS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.: 21CECG01833

[Assigned for all purposes to Hon. Crass in
Dept. 403]

**DECLARATION OF DAVID D. BIBIYAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE
ACTION SETTLEMENT AND
PROVISIONAL CLASS
CERTIFICATION FOR SETTLEMENT
PURPOSES ONLY**

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1 8. Not only have I practiced almost exclusively in this field for years and have
2 contributed to the legal education curriculum for attorneys practicing within it, I am also a
3 published author in the Daily Journal as a contributor in the Wage and Hour and PAGA context,
4 including, in December 15, an article entitled: “PAGA: What’s Gone, What’s Left and What’s
5 Next.” I have also been a quoted source in multiple other publications, including in article
6 published by Bloomberg Law dated November 1, 2023 entitled: “Adidas, Home Depot Sued in
7 Test Cases on Job Ad Pay Transparency.”

8 9. My firm has the experience, resources and means necessary to allow us to provide
9 adequate representation as Class Counsel to all Class Members in this litigation.

10 10. I have filed contested motions for class certification in the past and have been
11 appointed Class Counsel by the Superior Court of California in the past. Some examples of
12 Actions in which I was appointed Class Counsel include:

13 • *Santoyo v. Consolidated Foundries, Inc.*, Case No. BC612298, California Superior
14 Court, County of Los Angeles, Honorable Judge Ann I. Jones, presiding;

15 • *Arendorff v. Stanley Steamer International, Inc.*, Case No. BC681368, California
16 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos, presiding;

17 • *Barreto v. Don Roberto Jewelers, Inc.*, Case No. BC495451, California Superior Court,
18 County of Los Angeles, Honorable Ann I. Jones, presiding;

19 • *Junior Amilcar Laguna Gonzalez v. Takaaki Koyama*, Case No. BC641998, Los Angeles
20 Superior Court, Honorable Elihu M. Berle, presiding;

21 • *Rios v. Nongshim America, Inc.*, Case No. CIVDS1807390, California Superior Court,
22 County of San Bernardino, Honorable David S. Cohn, presiding;

23 • *Stoddard v. Molded Fiber Glass – West*, Case No. 1517758, California Superior Court,
24 County of San Bernardino, Honorable David S. Cohn, presiding;

25 • *Mata v. Sahara Scaffold, Inc.*, Case No. CIVDS1810785, California Superior Court,
26 County of San Bernardino, Honorable David S. Cohn, presiding;

27 • *Carrasco v. Pure Dental Solutions*, Case No. BC645995, Los Angeles Superior Court,
28 Honorable Kenneth R. Freeman, presiding;

1 • *Gonzalez v. Gochez, et al.*, Case No. BC648729, Los Angeles Superior Court, Honorable
2 Maren Nelson, presiding;
3 • *Montoya v. Superior Paving Co.*, Case No. CIVDS1833422, County of San Bernardino,
4 Honorable David S. Cohn, presiding;
5 • *Lopez v. Norred & Associates, Inc.*, Case No. CIVDS1824109, California Superior
6 Court, County of San Bernardino, David S. Cohn, presiding;
7 • *Noyola v. Lacren, LLC*, Case No. BC717024, California Superior Court, County of Los
8 Angeles, Hon. Anthony Mohr, presiding;
9 • *Luciano, et al. v. O'Tasty Foods, Inc., et al.*, Case No. BC711988, California Superior
10 Court, County of Los Angeles, Honorable Maren Nelson, presiding;
11 • *Gordon v. Hospice Source, LLC*, Case No. 34-2018-00250022-CU-OE-GDS, California
12 Superior Court, County of Sacramento, Honorable Christopher E. Krueger, presiding;
13 • *Barragan v. Refrigeration Supplies Distributor*, Case No. 19STCV09312, California
14 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
15 • *Ramirez v. Acre Gourmet, Inc.*, Case No. CGC-19-575117, California Superior Court,
16 County of San Francisco, Honorable Andrew Y.S. Cheng, presiding;
17 • *Villafuerte v. Bay Alarm Company*, Case No. BC689110, California Superior Court,
18 County of Los Angeles, Honorable Amy D. Hogue, presiding;
19 • *Cazares v. Areas USA LAX, LLC*, Case No. 19STCV08209, California Superior Court,
20 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
21 • *Magana v. Castlerock Environmental, Inc., et al.*, Case No. 19STCV38353, California
22 Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;
23 • *Chilel v. Sushi California, Inc.*, Case No. 19STCV08209, California Superior Court,
24 County of Los Angeles, Honorable Ann I. Jones, presiding;
25 • *Malone v. Orange Courier, Inc., et al.*, Case No. 30-2016-00763474, California Superior
26 Court, County of Orange, Honorable Glenda Sanders, presiding;
27 • *Rivera v. Talamo Food Services, Inc.*, Case No. 19CV355856, California Superior Court,
28 County of Santa Clara, Honorable Patricia M. Lucas, presiding;

1 • *Olguin v. Cal Central Harvesting, Inc.*, Case No. 18CV03860, California Superior Court,
2 County of Santa Barbara, Honorable James F. Rigali, presiding;

3 • *Pence v. Sober Living by the Sea, Inc.*, Case No. 2018-00988742, California Superior
4 Court, County of Orange, Honorable Randall J. Sherman, presiding;

5 • *Franco v. Vincent Rags, Inc.*, Case No. 20STCV07768, California Superior Court,
6 County of Los Angeles, Honorable Ann I. Jones, presiding;

7 • *Cabral v. Miller Castings, Inc.*, Case No. 19STCV39556, California Superior Court,
8 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;

9 • *Bolano v. Texas Roadhouse, Inc.*, Case No. 19STCV39556, California Superior Court,
10 County of Los Angeles, Honorable Sunshine Sykes, presiding;

11 • *Rodriguez v. Scott A. Humphreys, Inc.*, Case No. 30-2021-01184556-CU-OE-CXC,
12 California Superior Court, County of Ventura, Honorable Matthew P. Guasco, presiding; and

13 • *Torres v. Primal Pet Foods, Inc.* Case No. FCS054783, California Superior Court,
14 County of Solano, Honorable Wendy G. Getty, presiding;

15 • *Hanson v. Zapata Nuccio, Inc.*, Case No. 20STCV28951, California Superior Court,
16 County of Los Angeles, Honorable Elihu M. Berle, presiding;

17 • *Molina v. Avibank Mfg, Inc.*, Case No. 20STCV03910, California Superior Court,
18 County of Los Angeles, Honorable John P. Doyle, presiding;

19 • *Cetina v. Lawry's Restaurants, Inc.*, Case No. 19STCV05201, California Superior Court,
20 County of Los Angeles, Honorable Amy D. Hogue, presiding;

21 • *Luna v. Pronto California General Agency, LLC*, Case No. 19STCV39951, California
22 Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;

23 • *Alvarez v. Kazak-Mars, Inc.*, Case No. 20STCV42587, California Superior Court,
24 County of Los Angeles, Honorable Elihu M. Berle, presiding;

25 • *Noe v. My Pillow, Inc.* Case No. CIVDS 2011360, California Superior Court, County of
26 San Bernardino, Honorable David Cohn, presiding;

27 • *Nunez v. 2751 West Coast Acquisition Company*, Case No. 30-2020-01145215-CU-
28 OE-CXC, California Superior Court, County, County of Orange, Honorable Randall J. Sherman,

1 Presiding;

2 • *Smith v. McMillen Enterprises, Inc.*, Case No. CV-20-002938, California Superior Court,

3 County of Stanislaus, Honorable John R. Mayne, presiding;

4 • *Turner v. Plant Prefab Inc., et al.*, Case No. CIVDS2017517, California Superior Court,

5 County of San Bernardino, Honorable David Cohn, presiding;

6 • *Duran v. Fresh Select, LLC*, Case No. VCU284892, California Superior Court, County

7 of Tulare, Honorable Bret Hillman, presiding;

8 • *Reynoso, et al. v. Cream of the Crop AG Service, Inc.*, Case No. VCU278847, California

9 Superior Court, County of Tulare, Honorable Bret Hillman, presiding;

10 • *Michel v. Universal Waste Systems, Inc.*, Case No. 19STCV46181, California Superior

11 Court, County of Los Angeles, Honorable David S. Cunningham presiding;

12 • *Jungers v. U.S. Borax Inc., et al.*, Case No. BCV-21-10003, California Superior Court,

13 County of Kern, Honorable Bernard C. Barmann Jr. presiding;

14 • *Fortune v. Amoroso Limited Partnership, et al.*, Case No. 20STCV25874, California

15 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;

16 • *Montoya, et al. v. Remo, Inc.* Case No. 20STCV34614, California Superior Court,

17 County of Los Angeles, Honorable Maren Nelson presiding;

18 • *Rincon, et al. v. New-Indy Tripaq, LLC, et al.* Case No. 20STCV17118, California

19 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;

20 • *De Leon, et al. v. Wismettac Asian Foods, Inc.* Case No. 19STCV18172, California

21 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

22 • *Tapia v. Mercer Foods, Inc.* Case No. CV-21-000020, California Superior Court,

23 County of Stanislaus, Honorable Sonny S. Sandhu presiding;

24 • *Molina v. Reser's Fine Foods, Inc.* Case No. 37-2021-00013052-CU-OECTL, California

25 Superior Court, County of San Diego, Honorable Eddie C. Sturgeon presiding;

26 • *Reyes v. Imperial Sprinkler Supply, Inc.* Case No. 30-2020-01167748-CU-OE-CXC,

27 California Superior Court, County of Los Angeles, Honorable Peter Wilson presiding;

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1 • *Zavala, et al. v. PLS Check Cashers, Inc.* Case No. 20STCV42586, California Superior
2 Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
3 • *Paz v. Hill Brothers Chemical Company.* Case No. 20STCV48279, California Superior
4 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
5 • *Garcia v. Inwesco Incorporated.* Case No. 20STCV46833, California Superior Court,
6 County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
7 • *Guevara v. J&K Culver, LLC, et al.* Case No. 19STCV39951, California Superior Court,
8 County of Los Angeles, Honorable Elihu M. Berle presiding;
9 • *Hamilton v. Michael Kors Stores, Inc. et al.,* Case No. 19STCV37061, California
10 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
11 • *Arzooian v. A&M Administration, LLC, et al.* Case No. 21STCV05576, California
12 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
13 • *Santos, et al. v. Maruzen of America, Inc.,* Case No. 19STCV37662, California Superior
14 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
15 • *Schaffino v. M.O. Dion & Sons., Inc., et al.,* Case No. 20STCV38023, California Superior
16 Court, County of Los Angeles, Honorable Gail Killefer presiding;
17 • *Moreno v. Santa Paula Post Acute, LLC, et al.* Case No. 21STCV12533, California
18 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;
19 • *Singer v. Desert Area Resources and Training,* Case No. BCV-21-101093, California
20 Superior Court, County of Kern, Honorable Thomas S. Clark presiding;
21 • *Clarizio v. Guard-Systems, Inc.,* Case No. 21STCV28667, California Superior Court,
22 County of Los Angeles, Honorable Armen Tamzarian presiding;
23 • *Guzman v. Freschco Painters, Inc.,* Case No. 21STCV04683, California Superior Court,
24 County of Los Angeles, Honorable Lawrence P. Riff presiding;
25 • *Koutny v. PAE Aviation and Technical Services, LLC,* Case No. 21C-0106, California
26 Superior Court, County of Kings, Honorable Melissa R. D'Morias presiding;
27 • *Rodriguez v. Pacifica Trucks, LLC,* Case No. 20STCV37576, California Superior Court,
28 County of Los Angeles, Honorable Stuart Rice presiding;

1 • *Ramos v. AEGIS Treatment Centers, LLC*, Case No. 20STCV41429, California Superior
2 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
3 • *Valdez v. Integrated Building Services, Inc.* Case No. 20STCV37793, California Superior
4 Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
5 • *Harris v. America One Security, Inc.* Case No. 21STCV01399, California Superior
6 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
7 • *Moreno v. M&J Seafood Company, Inc.* Case No. 22STCV03341, California Superior
8 Court, County of Los Angeles, Honorable William F. Highberger presiding;
9 • *Corrales v. Q&B Foods, Inc.* Case No. 20STCV40885, California Superior Court,
10 County of Los Angeles, Honorable Elihu Berle presiding;
11 • *Arteaga v. Demolition Specialist, Inc.* Case No. RIC2001133, California Superior Court,
12 County of Riverside, Honorable Harold Hopp presiding;
13 • *Vigil, et al. v. Capstone Turbine Corporation*, Case No. 20STCV32123, California
14 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
15 • *Ramirez v. Sea-Win, Inc.* Case No. 21STCV22026, California Superior Court, County
16 of Los Angeles, Honorable Lawrence P. Riff presiding;
17 • *Ortega Chavez v. Winpak Lane, Inc.* Case No. CIVSB2207313, California Superior
18 Court, County of San Bernardino, Honorable Jessica Morgan presiding;
19 • *Garcia v. American Licorice Company.* Case No. RG21107049, California Superior
20 Court, County of Alameda, Honorable Brad Seligman presiding;
21 • *Madrono v. Vitale Nursing, Inc, et al.*, Case No. 21STCV09845, California Superior
22 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding; and
23 • *Orellana v. Advanced Building Maintenance.* Case No. 34-2020-00286791-CU-OE-
24 GDS, California Superior Court, County of Sacramento, Honorable Jill Talley presiding.
25 • *Aguilar v. Bioness, Inc., et al.*, Case No. 21STCV41702, California Superior Court,
26 County of Los Angeles, Honorable Lawrence P. Riff presiding;
27 • *Antoine v. Pinky Beverly Hills, LLC., et al.* Case No. 19STCV44856, California
28 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

1 • *Phambui v. Fashion Marketing and Merchandising Group, Inc., et al. Case No.*
2 *21STCV06634*, Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;
3 • *Ortega Chavez v. Winkpak Lane, Inc., et al. Case No. CIVSB2202274*, California
4 Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;
5 • *Carrasco v O.H. Barkhordar D.D.S., Inc., et al. Case No. 22STCV21188*, California
6 Superior Court, County of Los Angeles, Honorable Lawrence Riff presiding;
7 • *Correia v. Gallo Glass Company, et al. Case No. CV-21-006459*, California Superior
8 Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
9 • *Davis v. Beeline Import and Services, LLC, et al. Case No. CIVSB2119287*, California
10 Superior Court, County of San Bernardino, Honorable David Cohn presiding;
11 • *Angel Lopez v Innovative Coatings Technology Corporation dba Incotec, et al. Case No.*
12 *30-2020-01173245-CU-OE-CXC*, California Superior Court, County of Orange, Honorable Lon
13 Hurwitz presiding;
14 • *Lopez v UPM, Inc., et al. Case No. 20STCV36695*, California Superior Court, County of
15 Los Angeles, Honorable Lawrence P. Riff presiding;
16 • *Moreno v. Infiniti Group LLC., et al. Case No. CIVSB2223551*, California Superior
17 Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;
18 • *Kelley v. Applus Technologies, Inc., et al. Case No. CIVSB2204889*, California Superior
19 Court, County of San Bernardino, honorable Jessica Morgan presiding;
20 • *Hernandez v Bromley Foods, Inc., et al. Case No. 56-2021-00561326-CU-OE-VTA*,
21 California Superior Court, County of Ventura, Honorable Henr Walsh presiding;
22 • *Heredia v. Alan Smith Pool Plastering, Inc., et al. Case No. 30-2020-01163609-CU-OE-*
23 *CXC*, California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;
24 • *Martinez Guzman v Freshco Painters Inc., et al. Case No. 21STCV04683*, California
25 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
26 • *Gomez Mireles v. USG Ceilings Plus, LLC., et al. Case No. 21STCV45606*, California
27 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
28 • *Garzon v. Mobile Hi-Tech Wheels, LLC., et al., Case No. 21STCV15396*, California

1 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
2 • *Dethrasavong v. ASI Computer Technologies, Inc., et al.* Case No. 20STCV32312,
3 California Superior Court, County of Contra Costa, Honorable Kenneth R. Freeman presiding;
4 • *Lopez v. Waldorf Astoria Management LLC., et al.* Case No. 20STCV17212, California
5 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;
6 • *Viveros v. Mission Produce, Inc., et al.* Case No. 20STCV15737, California Superior
7 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
8 • *Flores v. United Maintenance Company, Inc., et al.* Case No. 21STCV07008, California
9 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
10 • *Blandi v. Francesca Restaurant, LLC., et al.* Case No. 37-2022-00049034-CU-OE-CTL,
11 California Superior Court, County of San Diego, Honorable Marcella O. McLaughling presiding;
12 • *Lopez Cabrera v. South Valley Almond Company, LLC, et al.* Case No. BCV-2-100722,
13 California Superior Court, County of Kern, Honorable Bernard C. Barmann, Jr. presiding;
14 • Guillermo Cruz v. Alma Family Serives, et al. Case No. 21STCV18156, California
15 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
16 • *Davood v. NKSFB, LLC, et al.* Case No. 22STCV17305, California Superior Court,
17 County of Los Angeles, Honorable Christopher K. Lui presiding;
18 • *Ferrer v. Ineos USA, LLC., et al.,* Case No. 21STCV28076, California Superior Court,
19 County of Los Angeles, Honorable Elihu M. Berle presiding;
20 • *Portillo Sanchez v. Paragon Services Janitorial Orange County, LLC, et al.* Case No.
21 20STCV38562, California Superior Court, County of Los Angeles, Honorable William F.
22 Highberger presiding;
23 • *Trigueros Garcia v. Highland Plastics, Inc., et al.,* Case No. CVRI2202836, California
24 Superior Court, County of Riverside, Honorable Harold Hopp presiding;
25 • *Magana Ramirez v. 360 Support Services, et al.* Case No. 22STCV20456, California
26 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
27 • *Morales v. Baldy's Restaurant Group, LLC., et al.* Case No. 20STCV36535, California
28 Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;

1 • *Gonzales v. El Monte Rents, Inc., et al.* Case No. 21STCV10209, California Superior
2 Court, County of Los Angeles, Honorable Stuart M. Rice presiding;

3 • *Gonzalez v. Total Education Solutions, Inc., et al.* Case No. 20STCV37984, California
4 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;

5 • *Helaire v. Smithfield Packaged Meats Corp, et al.* Case No. JCCP5244, California
6 Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;*Hernandez v.*
7 *Central Valley Recovery Services, et al.* Case No. VCU290220, California Superior Court, County
8 of Tulare, Honorable Brett Hillman presiding;

9 • *Hernandez v. SC Commercial, LLC, et al.* Case No. 30-2020-01166961-CU-OE-CXC,
10 California Superior Court, County of Orange, Honorable Lon Hurwitz presiding;

11 • *Hines v. Constellis Integrated Risk Management Services, et al.* Case No.
12 20STCV26962, California Superior Court, County of Los Angeles, Honorable Christopher K. Lui
13 presiding;

14 • *Moya v. Valassis Direct Mail, Inc., et al.* Case No. 21STCV09412, California Superior
15 Court, County of Los Angeles, Honorable Stuart Rice presiding;

16 • *Jordan v. The Martin-Brower Company, LLC, et al.,* Case No. 21STCV41435, California
17 Superior Court, County of Los Angeles, honorable Stuart Rice presiding;

18 • *Juarez v. Calmet Services, Inc., et al.* Case No. 21STCV33668, California Superior
19 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;

20 • *Mcintosh v. WWL Vehicle Services Americas Inc., et al.* Case No. 56-2022-00562544-
21 CU-OE-VTA, California Superior Court, County of Ventura, Honorable Benjamin Coats
22 presiding;

23 • *Mendoza v. Amusement Industry, Inc., et al.* Case No. 21STCV09790, California
24 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

25 • *Moore v. Dnata US Inflight Catering LLC, et al.* Case No. CGC-20-586512, California
26 Superior Court, County of San Francisco, Honorable Curtis Karnow presiding;

27 • *Peterson v. Sorenson Engineering, Inc., et al.* Case No. CIVDS2023994, California
28 Superior Court, County of San Bernardino, Honorable David Cohn presiding;

1 • *Torres v. Laurel Avenue, LLC, et al.* Case No. CIVSB2202708, California Superior
2 Court, County of San Bernardino, Honorable David Cohn presiding;
3 • *Nunley v. Cardinal Logistics Management Corporation et al.* Case No. CIVSB2210430,
4 California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;
5 • *Pastrana v. National Sign & Marketing Corporation et al.* Case No. CIVSB2118749,
6 California Superior Court, County of San Bernardino, Honorable David Cohn presiding;
7 • *Pineda v. Grand Life, Inc., et al.* Case No. 21STCV28066, California Superior Court,
8 County of Los Angeles, Honorable Elihu M. Berle presiding;
9 • *Pattingale v. Laird Family Estate, LLC et al.* Case No. 22CV000048, California Superior
10 Court, County of Napa, Honorable Cynthia P. Smith presiding;
11 • *Ramirez v. Sea Win, Inc., et al.* Case No. 21STCV22026, California Superior Court,
12 County of Los Angeles, Honorable Lawrence P. Riff presiding;
13 • *Reategui v. Cal Building & Maintenance Industries, Inc.,* Case No. 20STCV39648,
14 California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
15 • *Rodriguez v. ACRA Aerospace, LLC, et al.* Case No. 30-2020-01171360-CU-OE-CXC,
16 California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;
17 • *Rodriguez v. Ultra Pro International LLC, et al.* Case No. 21STCV11250, California
18 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
19 • *Ruiz v. Kleen Harvest, Inc., et al.* Case No. 21CV002319, California Superior Court,
20 County of Monterey, Honorable Thomas W. Wills presiding;
21 • *Roberto Ruiz v. Protech Delivery and Installation et al.* Case No. 21STCV07001,
22 California Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;
23 • *Russell v. CIMC Reefer Trailer, Inc., et al.* Case No. RIC2001777, California Superior
24 Court, County of Riverside, Honorable Harld Hopp presiding;
25 • *Russell v. Staffmark Investment LLC, et al.* Case No. CVRI12103921, California
26 Superior Court, County of Riverside, Honorable Harold Hopp presiding;
27 • *Quintanilla et al. v. Chrome Hearts LLC, et al.* Case No. 21STCV43180, California
28 Superior Court, County of Los Angeles, Honorable Elihu B. Berle presiding;

1 • *Taat v. Acell, Inc., et al.* Case No. 37-2022-00005437-CU-OE-CTL, California Superior
2 Court, County of San Diego, Honorable Matthew C. Braner presiding;
3 • *Todd v. Motivate, LLC, et al.* Case No. CGC-23-605052, California Superior Court,
4 County of San Francisco, Honorable Anne- Christine Massullo presiding;
5 • *Turner Sr., v. The Sidewalk Café, Inc., et al.* Case No. 21STCV10154, California
6 Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
7 • *Vargas-Flores v. Harbor Bay Club, Inc., et al.* Case No. 21CV002396, California
8 Superior Court, County of Alameda, Honorable Michael Markman presiding;
9 • *Vasquez v. Liquid Technologies, Inc., et al.* Case No. CIVDS2023892, California
10 Superior Court, County of San Bernardino, Honorable Joseph Ortiz presiding;
11 • *Vasquez et al. v. Kingswood LLC, et al.,* Case No. 20STCV32123, California Superior
12 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
13 • *Sandoval Villafana v. Satco, Inc., et al.* Case No. 21STCV17085, California Superior
14 Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
15 • *Williams v. Marrs Services, Inc., et al.* Case No. 21STCV23775, California Superior
16 Court, County of Los Angeles, Honorable Stuart M. Stuart presiding;
17 • *Low v. Triple Canopy, Inc., et al.* Case No. 37-2023-0007078-CU-OE-CTL, California
18 Superior Court, County of San Diego, Honorable Carolyn Caietti presiding;
19 • *Camacho v. Premium Electric Corp, et al.* Case No. 22STCV26878, California Superior
20 Court, County of Los Angeles, Honorable David S. Cunningham presiding;
21 • *Lopez v. Bachem Americas, Inc., et al.* Case No. 23STCV04258, California Superior
22 Court, County of Los Angeles, Honorable Laura Seigle presiding;
23 • *Mendoza Cendejas v. E. & J. Gallo Winery, et al.* Case No. CV-22-005396, California
24 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
25 • *Romero v. Armstrong Installation Service, et al.* Case No. 22CV022519, California
26 Superior Court, County of Alameda, Honorable Noel Wise presiding;
27 • *Perez v. D&G Restaurants, LLC, et al.* Case No. 30-2021-01209638-CU-OE-CXC,
28 California Superior Court, County of Orange, Honorable Peter Wilson presiding;

1 • *Sarmiento, et al. v. Neil Jones Food Company* Case No. 21CECG03825, California
2 Superior Court, County of Fresno, Hon. Kristi Culver Kapetan presiding; and

3 • *Garcia v. Nature Fresh Farms, LLC, et al.* Case No. ECU001961, California Superior
4 Court, County of Imperial, Honorable Jeffery B. Jones presiding.

5 11. I have also settled matters on a “PAGA Only” basis for aggrieved employees in the
6 past, including in:

7 • *Flores v. Delta Apparel, Inc.*, Case No. BC641499, California Superior Court, County
8 of Los Angeles, Honorable Daniel J. Buckley, presiding;

9 • *Segura v. CJ Foods Service Holdings USA, LLC*, Case No. 19STCV24918, California
10 Superior Court, County of Los Angeles, Honorable Maureen Duffy-Lewis, presiding;

11 • *Sierra v. Nexem-Allied, LLC*, Case No. 20STCV11281, California Superior Court,
12 County of Los Angeles, Honorable Randolph M. Hammock, presiding;

13 • *Nodal v. Sodexo, Inc.*, Case No. 20STCV40601, California Superior Court, County of
14 Los Angeles, Honorable Lawrence Riff, presiding; and

15 • *Cooper v. Lucas Health Partners*, Case No. 20STCV20050, California Superior Court,
16 County of Los Angeles, Honorable Maren Nelson, presiding;

17 • *Herrera v. Greystar Management, LP, et al.*, Case No. 37-2020-00009672-CU-OE-CTL,
18 California Superior Court, County of San Diego, Honorable Carolyn Caietti, presiding;

19 • *Slater v. Jo-Ann Stores, LLC.*, Case No. 21STCV18454, California Superior Court,
20 County of Los Angeles, Honorable Maurice A. Leiter, presiding;

21 • *Bolanos v. Canoga Park Heating & Air Conditioning, Co., Inc.*, Case No. 21STCV12674,
22 California Superior Court, County of Los Angeles, Honorable Yolanda Orozco, presiding;

23 • *Granados v. Cosmetic Ideas, Inc.* Case No. 21STCV10797, California Superior Court,
24 County of Los Angeles, Honorable Richard L. Fruin, presiding;

25 • *Ruano v. DPC Woodwork, Inc.* Case No. 21STCV00408, California Superior Court,
26 County of Los Angeles, Honorable Jon R. Takasugi presiding;

27 12. *Hardy v. Texas Roadhouse Management Corp., et al.* Case No. CIVSB2222259,
28 California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;

1 13. *Iraheta v Legacy Farmers, Inc., et al.* Case No. MSC21-00762, California Superior
2 Court, County of Los Angeles, Honorable Charles S. Treat presiding;

3 14. *Landin v Central Janitors' Supply Co., Inc., et al.* Case No. CV-21-006391, California
4 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;

5 15. *Bailey v. Cannon Constructors, et al.* Case No. 21STCV38274, California Superior
6 Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;

7 16. *Johns, et al. v. Whelan Security of California, Inc., et al.* Case No. 22STCV68687,
8 California Superior Court, County of Los Angeles, Honorable Laura Seigle presiding;

9 17. *Carrion v. Clutter, Inc., et al.* Case No. 23STCV06709, California Superior Court,
10 County of Los Angeles, Honorable Kerry Bensinger presiding;

11 18. *Delia v. The Irvine Company, LLC, et al.* Case No. 30-2019-01050823-CU-OE-CXC,
12 California Superior Court, County of Orange, Honorable William D. Claster presiding;

13 19. *Landin v. Central Janitor's Supply Co., Inc., et al.* Case No. CV-21-006391, California
14 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;

15 20. *German Vaca et al., v. California Pizza Kitchen, Inc., et al.* Case No. 30-2022-01278828-
16 CU-OE-CXC, California Superior Court, County of Orange, Honorable Randall Sherman
17 presiding;

18 21. *London Young v. Amazon.com LLC, et al.* Case No. 21STCV38280, California Superior
19 Court, County of Los Angeles, Honorable Elaine Lu presiding;

20 22. *Martinez v. Dick's Sporting Goods, Inc., et al.* Case No. 22STCV17283, California
21 Superior Court, County of Los Angeles, Honorable Armen Tamzarian presiding;

22 23. *Latrice Ackles v. Brinker Restaurant Corporation, et al.* Case No. 22STCV19068,
23 California Superior Court, County of Los Angeles, Honorable Gail Killefer presiding; and

24 24. *Ruiz v. Edelbrock Foundry, LLC, et al.* Case No. 20STCV19057, California Superior
25 Court, County of Los Angeles, Honorable David S. Cunningham presiding.

26 25. Furthermore, my office has succeeded in certifying classes in contested motions for
27 class certification. Some of the classes and theories we have certified include, without limitation,
28 for failure to pay the regular rate of pay; failing to pay overtime and minimum wages, including,

1 without limitation, for temperature checks; failure to provide meal and rest premiums, including,
2 without limitation, for requiring employees to walk during breaks; failure to timely pay wages
3 prior to separation of employment; wage statement violations; and unfair competition. Some
4 examples of matters in which we have done so include, without limitation:

5 • *Hernandez, et al. v. C.R. Lawrence Co., Inc.*, Case No. 20STCV32372, California
6 Superior Court, County of Los Angeles, Hon. William Highberger presiding; and

7 • *Lopez v. Rolling Hills Country Club*, Case No. 21STCV22636, California Superior
8 Court, County of Los Angeles; Hon. Carolyn B. Kuhl presiding; and

9 • *Torres v. Johnston Nurseries, FLP*, Case No. BCV-19-100830 TSC, California Superior
10 Court, County of Kern; Hon. Thomas S. Clark, presiding.

11 26. I believe that I am sufficiently experienced and qualified to evaluate the Class
12 Members' claims and viability of Defendants' defenses.

13 27. Vedang J. Patel has been a member of my law firm for over two (2) years and served
14 as class counsel on numerous actions on which I was also named class counsel. Prior to working
15 with Bibiyan Law Group, P.C., he practiced law as a member of Murchison & Cumming, LLP,
16 on a variety of matter on behalf of defendants. Thereafter, he joined Bibiyan Law Group, P.C.
17 practicing law on behalf plaintiffs in matters of employment law, and specifically on issue of
18 unpaid wages and class action settlements. He is currently a senior attorney and Partner at Bibiyan
19 Law Group, P.C. Among other tasks, he oversees and manages all settlements at Bibiyan Law
20 Group, P.C.

21 28. Currently, my firm is acting as counsel in tens of wage and hour class actions and
22 representative PAGA actions.

23 29. Class Counsel believe no conflicts, disabling or otherwise, exists between Plaintiff
24 and Class Members because Plaintiff alleges to have been damaged by the same alleged conduct
25 of Defendants (i.e., Plaintiff was an hourly, non-exempt employee, not paid premium pay, etc.)
26 and thus has the incentive to fairly represent all Class Members' claims to achieve the maximum
27 possible recovery.

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LLC for further data analysis in the amount of \$1,595.

(6) Attached hereto as Exhibit “7” is an invoice from ADR Services, Inc. for mediation services in the amount of \$4,795.

Bibiyan Law Group, P.C.’s Hours Spent on the Case

37. Bibiyan Law Group, P.C., has spent approximately 489.25 hours litigating this case to-date. Attached hereto as Exhibit “8” is Bibiyan Law Group’s Billing Sheet detailing hours dedicated to this matter.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct this September 18, 2026, at Los Angeles, California.

/s/David Bibiyan

David D. Bibiyan

EXHIBIT 1

List of Expenses Items 2024.03.28 - 9/17/2026



David D. Bibiyan
Attorney at Law
 1460 Westwood Blvd.
 Los Angeles, California 90024
 310.438.5555 T
 310.300.1705 F
 david@tomorrowlaw.com
 www.tomorrowlaw.com

September 17, 2026

DATE	TYPE	PAYABLE TO	TOTAL AMOUNT	
6/26/2026	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
5/8/2026	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
5/14/2026	E-Filing/E-Service	Steno Agency, Inc.	\$	94.95
10/7/2025	Deposition Services	Network Deposition Services	\$	998.90
10/15/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
9/24/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
9/19/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	94.95
9/16/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
8/21/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
8/21/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
8/20/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
8/4/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
7/8/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
12/9/2025	Data Analysis	Phillips, Fractor & Company, LLC	\$	14,987.50
9/22/2025	Mediation	Signature Resolution	\$	7,750.00
8/11/2025	Data Analysis	ALLMAN & PETERSEN ECONOMICS, LLC	\$	1,137.50
9/2/2025	Postage	United States Postal Service	\$	10.44
8/24/2025	Hotel	Rafael Yedoyan, Esq.	\$	210.00
8/24/2025	Flight	Rafael Yedoyan, Esq.	\$	488.96
8/11/2025	Data Analysis	Phillips, Fractor & Company, LLC	\$	1,125.00

List of Expenses Items 2024.03.28 - 9/17/2026

7/23/2025	Postage	United States Postal Service	\$	10.73
4/14/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
5/29/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	160.00
4/14/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
6/13/2025	Transcripts	FRESNO DEPOSITION REPORTERS, INC.	\$	913.30
6/5/2025	Transcripts	FRESNO DEPOSITION REPORTERS, INC.	\$	746.00
2/10/2025	E-Filing	All-N-One Legal Support	\$	343.00
3/31/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	94.95
3/26/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
3/24/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
3/6/2025	E-Filing/E-Service	Steno Agency, Inc.	\$	54.95
2/26/2025	Court Reporter Fee	Network Deposition Services	\$	4,846.40
1/30/2025	E-Filing	All-N-One Legal Support	\$	15.45
1/24/2025	E-Filing	All-N-One Legal Support	\$	15.45
1/2/2025	E-Filing	All-N-One Legal Support	\$	14.00
12/11/2024	E-Filing	All-N-One Legal Support	\$	14.00
10/2/2024	E-Filing	All-N-One Legal Support	\$	14.00
9/30/2024	E-Filing	All-N-One Legal Support	\$	14.00
8/8/2024	Analysis	Berger Consulting Group, LLC	\$	1,595.00
4/26/2024	Postage	United States Postal Service	\$	8.69
4/12/2024	Mediation	ADR Services, Inc.	\$	4,795.00
3/4/2024	E-Filing	All-N-One Legal Support	\$	13.10
1/19/2024	E-Filing	OnCall-Legal	\$	79.34
1/24/2024	E-Filing	All-N-One Legal Support	\$	13.10
11/9/2023	Court Hearing	CourtCall	\$	72.00
11/1/2023	Postage	United States Postal Service	\$	0.63
10/27/2023	Court Hearing	CourtCall	\$	72.00
10/19/2023	E-Filing	All-N-One Legal Support	\$	13.10
10/19/2023	Court Hearing	CourtCall	\$	72.00
10/13/2023	E-Filing	All-N-One Legal Support	\$	13.10
10/12/2023	E-Filing	All-N-One Legal Support	\$	13.10
9/21/2023	Court Hearing	CourtCall	\$	72.00
9/20/2023	E-Filing	All-N-One Legal Support	\$	12.60
3/16/2023	E-Filing	All-N-One Legal Support	\$	12.75
3/15/2023	Postage	United States Postal Service	\$	2.46

List of Expenses Items 2024.03.28 - 9/17/2026

1/20/2023	E-Filing	All-N-One Legal Support	\$	9.00
1/19/2023	Court Hearing	CourtCall	\$	72.00
1/23/2023	E-Filing	All-N-One Legal Support	\$	32.75
1/18/2023	Postage	United States Postal Service	\$	2.85
11/30/2022	Services	CourtCall	\$	94.00
11/30/2022	Court Hearing	CourtCall	\$	94.00
11/14/2022	E-Filing	All-N-One Legal Support	\$	32.75
11/16/2022	E-Filing	All-N-One Legal Support	\$	9.00
11/10/2022	E-Filing	All-N-One Legal Support	\$	12.75
8/18/2022	Court Hearing	CourtCall	\$	94.00
4/13/2022	E-Filing	All-N-One Legal Support	\$	94.00
4/12/2022	E-Filing	All-N-One Legal Support	\$	12.75
3/19/2022	Deposition (Room)	DoubleTree Hilton	\$	298.32
2/15/2022	E-Filing	All-N-One Legal Support	\$	12.75
2/15/2022	E-Filing	All-N-One Legal Support	\$	12.75
2/9/2022	Court Hearing	CourtCall	\$	94.00
12/8/2021	E-Filing	All-N-One Legal Support	\$	12.75
11/19/2021	Postage	United States Postal Service	\$	54.95
11/15/2021	Postage	United States Postal Service	\$	7.58
11/11/2021	Postage	United States Postal Service	\$	22.74
10/20/2021	E-Filing	All-N-One Legal Support	\$	12.75
10/20/2021	Court Hearing	CourtCall	\$	94.00
7/28/2021	Process Service	All-N-One Legal Support	\$	97.26
9/30/2021	E-Filing	All-N-One Legal Support	\$	12.75
10/13/2021	Court Hearing	CourtCall	\$	94.00
9/13/2021	E-Filing	All-N-One Legal Support	\$	12.75
6/30/2021	E-Filing	All-N-One Legal Support	\$	13.20
7/1/2021	E-Filing	All-N-One Legal Support	\$	12.75
6/25/2021	Case Initiation	All-N-One Legal Support	\$	1,447.75
12/3/2020	LWDA fee	Labor Workforce Development Agency	\$	75.00
Total			\$	44,731.60

EXHIBIT 2



Statement

Date

12/9/2025

To:

Blackstone Law
8383 Wilshire Boulevard, Suite 745
Beverly Hills, CA 90211

Amount Due

Amount Enc.

\$14,987.50

Date

Transaction

Amount

Balance

12/31/2024	Balance forward		0.00
	Huerta v. Batth Farms-		
08/01/2025	INV #2508-BL825. Due 08/31/2025.	1,125.00	1,125.00
08/18/2025	PMT #1967. Paid by Bibiyan Law Group	-1,125.00	0.00
09/04/2025	INV #2509-BL825. Due 10/04/2025.	6,462.50	6,462.50
10/01/2025	INV #2510-BL825. Due 10/31/2025.	6,125.00	12,587.50
11/03/2025	INV #2511-BL825. Due 12/03/2025.	2,400.00	14,987.50

CURRENT

1-30 DAYS PAST DUE

31-60 DAYS PAST
DUE

61-90 DAYS PAST
DUE

OVER 90 DAYS PAST
DUE

Amount Due

0.00

2,400.00

6,125.00

6,462.50

0.00

\$14,987.50

EXHIBIT 3

Allman & Petersen Economics, LLC

7677 Oakport Street, Suite 610
Oakland, CA 94621
(510) 382-1550
www.allmaneconomics.com

Phillip H. Allman, Ph.D.
Jeffrey S. Petersen, Ph.D.
Max D. Allman, M.A., CFA

July 30, 2025

David Bibiyan
Bibiyan Law Group
1460 Westwood Blvd, Ste 300
Los Angeles, CA 90024-4937

Re: **Huerta v. Batth Farms, Inc.**

Dear Mr. Bibiyan:

This letter is to serve as a contract for services between ALLMAN & PETERSEN ECONOMICS, LLC and Bibiyan Law Group for services to be conducted on the following matter:

Case: Ramon Huerta, et al. v. Batth Farms, Inc., et al.
Case No.: 21CECG01833
Jurisdiction: Fresno County Superior Court

The rates for services are as follows:

Economic research and analysis, document review, office and client consultations, deposition preparation and trial preparation.

- Ph.D. Economist	\$650/hour
- Senior Economist	\$475/hour
- Economist or CPA	\$325/hour
- Survey Administration	\$125/hour

Deposition testimony. \$850/hour

Arbitration and trial testimony. \$850/hour

Travel Time \$300/hour

All other expenses billed at cost.

A retainer in the amount of **\$5,000** will be required before any work is started. This amount will be applied towards any work conducted by this office.

Please,

1) Fill in the information above.

2) Initial each item under Responsibilities, Charges, and Terms stated on the following page.

3) Sign the agreement and return to Allman & Petersen.

4) Mail the retainer check or send via wire. Wire instructions: Bank-Wells Fargo, Routing #121000248, Account #5661223494.

Tax ID # 20-2053788 (partnership)

RESPONSIBILITIES

1. You, and not your client, are responsible for payment of all billings, which shall include all work conducted by ALLMAN & PETERSEN ECONOMICS, LLC. As a courtesy, we will accept your clients check. However, this courtesy does not set precedent or relieve you of responsibility for all payments. Prompt payment within 30 days of invoice is required. Payment is not to be delayed because your client has not paid or is slow paying you.

Initial here: DD [signature]

2. Invoiced balances must be paid prior to deposition or court testimony. An additional retainer may be requested prior to testimony to cover the cost of testimony. This retainer must be paid prior to trial testimony.

Initial here: DD [signature]

CHARGES

1. Rates cover, but are not limited to research, analysis, consultations, reports, travel, court appearances, and deposition and trial testimony. Any cost estimates for services are for your budgeting purposes only and are not quotes which are binding to ALLMAN & PETERSEN ECONOMICS, LLC unless expressly agreed to by ALLMAN & PETERSEN ECONOMICS, LLC in writing.

Initial here: DD [signature]

2. There may be a charge for standby time for a court appearance or other scheduled activity. **Initial here:**

DD [signature]

3. In addition to rates, there may be expenses. Expenses include, but are not limited to travel (airline fare, parking, etc.), research fees, costs for charts used in trial, and other prepaid expenses.

Initial here: DD [signature]

TERMS

The responsibilities, charges, and terms herein contained shall constitute a binding agreement between you and ALLMAN & PETERSEN ECONOMICS, LLC. This agreement shall be subject to the laws of California and enforceable in the State of California, and shall remain in effect until you advise ALLMAN & PETERSEN ECONOMICS, LLC in writing that their services are no longer required for the referenced case and all billings for their services are paid in full. In enforcing this agreement ALLMAN & PETERSEN ECONOMICS, LLC shall be entitled to recover its reasonable costs and expenses including court costs, legal fees and the like.

Initial here: DD [signature]

ACCEPTED BY: David [signature] (Aug 12, 2025 05:06:31 PDT)

DATE : 08/12/2025

PHILLIP H. ALLMAN III

Phillip Allman

DATE : 7/30/2025

EXHIBIT A

ALLMAN & PETERSEN ECONOMICS, LLC
7677 OAKPORT ST STE 610
OAKLAND, CA 94621

4425

11-4288/1210 4000

10/25/25

Date

Pay to the
Order of

Bibiyan Law Group

\$ 3,862.50

Three thousand eight hundred sixty two + ⁵/₁₀₀ Dollars



Photo
Safe
Deposit®
Details on back

WELLS
FARGO

Wells Fargo Bank, N.A.
California
wellsfargo.com

For

Retainer refund - Horta v. Baum Fams

[Signature] MP

⑆ 121042882⑆ 5661223494⑆ 04425

Allman & Petersen Economics, LLC

7677 Oakport Street, Suite 610
Oakland, CA 94621
(510) 382-1550
www.allmaneconomics.com

Phillip H. Allman, Ph.D.
Jeffrey S. Petersen, Ph.D.
Max D. Allman, MA, CFA

November 5, 2025

David D. Bibiyan
Bibiyan Law Group, P.C.
1460 Westwood Blvd, Ste 300
Los Angeles, CA 90024-4937

Dear Mr. Bibiyan,

Enclosed please find the refund check for the remaining retainer for Huerta v. Batth Farms.

Sincerely,



Phillip H. Allman, Ph.D.

Balance Due: \$0.00

EXHIBIT 4



Invoice #: 2508-BL825

8/1/2025

Invoice

Blackstone Law
8383 Wilshire Boulevard, Suite 745
Beverly Hills, CA 90211

For consulting services rendered on: **Huerta v. Batth Farms**

Description of Hours Worked			Hours	Rate	Total
7/23/2025	Mr. Chasworth	Review employee data	1.50	400.00	600.00
7/25/2025	Mr. T.A. Sargent	Review employee data	1.50	350.00	525.00

Terms: Due upon receipt

Please remit checks payable to: Phillips, Fractor & Company, LLC
Tax ID Number: 45-5551955

Total **\$1,125.00**

Payments/Credits **\$0.00**

Balance Due **\$1,125.00**

It is customary to pay for professional services when rendered. If not paid within thirty (30) days, a 1.5% monthly fee will be charged on all past due amounts. In the event it becomes necessary to employ a collection agency or attorney to collect past due accounts or initiate court proceedings, you will be responsible for all fees and court costs.

EXHIBIT 5



Network Deposition Services, Inc.
1800 Century Park East • Suite 150
Los Angeles, CA 90067
Phone (310) 557-3400 • (800) 788-2021
Fax (310) 557-3555 • networkdepo.com

I am an invoice.
Take me to your accounts
payable department.

Invoice No. **A25021380**
Invoice Date **February 26, 2025**
Invoice Total **4,846.40**
Balance Due **4,846.40**

Bibiyan Law Group, P.C.
Attention: Rafael Yedoyan, Esq.
1460 Westwood Boulevard
Los Angeles, CA 90024

Federal Tax ID No. 77-0591481 • A service fee of 1.5% per month will be added to this invoice from the original invoice date if it is not paid within 90 days of the conclusion of the case notwithstanding any appeals.

Noticing firm	Bibiyan Law Group, P.C.	Case No.	NDS Job No.	Client Matter No.	Deposition Date
Noticed by	David D. Bibiyan, Esq.	21CECG01833	248010		1-28-2025
Deposition of	Kanwarjit Batth				
Caption	Ramon Huerta vs. Batth Farms, Inc.,				
Description of Service					Amount
Court Reporting					3,103.25
Exhibits					98.15
Legal Video					1,645.00

NDS invoice version 3.2

Detach lower portion and return with your payment. Please do not staple check.

Payment From

Bibiyan Law Group, P.C.
Attention: Rafael Yedoyan, Esq.
1460 Westwood Boulevard
Los Angeles, CA 90024

Invoice No.	A25021380
Invoice Date	February 26, 2025
Total Due	4,846.40

Write notes or address changes below

Amount Enclosed	
-----------------	--

Make Checks Payable To

Network Deposition Services, Inc.
1800 Century Park East
Suite 150
Los Angeles, CA 90067

Be aware! Online banking fraud is on the rise. If you receive an email containing **wire transfer instructions**, call us immediately to verify the information prior to sending the funds.

EXHIBIT 6

INVOICE

EXHIBIT 7

ADR Services, Inc.
1900 Avenue of the Stars, Suite 200
Los Angeles, California 90067
(310) 201-0010
accounting@adrservices.com

INVOICE NO.
24-2198-RAR-01



RE: HUERTA v. BATTH FARMS, INC.
ADRS Case No. 24-2198-RAR

BILL TO

David Bibiyan, Esq.
Jeffrey Klein, Esq.
Sarah Cohen, Esq.
Bibiyan Law Group, P.C.
1460 Westwood Blvd.
Los Angeles, California 90024

DATE
04/12/2024

PLEASE PAY
\$4,795.00

DUE DATE
06/03/2024

NEUTRAL

Hon. Raul Ramirez

PARTY REPRESENTED

Ramon Huerta

Date of Services	Description	Hours	Rate	Total	Pro Rata	Your Portion
04/12/2024	Non-Refundable Administrative Fee					\$395.00
	Review of Briefs, Preparation	2.0 hours	\$800.00	\$1,600.00	1/2	\$800.00
08/01/2024	Mediation Hearing	8.0 hours	\$800.00	\$6,400.00	1/2	\$3,200.00
	Pre-Mediation Telephonic Conference	1.0 hour	\$800.00	\$800.00	1/2	\$400.00
TOTAL DUE						\$4,795.00

Rate: \$800/hour

Last Day to Cancel/Continue: 07/17/2024

REMITTANCE INSTRUCTIONS

Please make your check payable to ADR Services, Inc. and mail to the address in the upper left-hand corner. Please indicate the case name and invoice number.

You may also pay balances of up to \$10,000 online via credit card by visiting our website here:

<https://www.adrservices.com/contact/pay-invoice/>

Tax ID: 20-0098025

[Click here to download a copy of our W-9.](#)

Fees for unused Mediation time will not be refunded. Any additional time expended will be billed at the neutral's hourly rate. Any unused portion of retainer billing for non-mediated cases will be refunded to the parties at the conclusion of the matter. Please note that counsel, not the represented party, has contracted for the neutral's services.

This invoice represents your party's balance due only. Please remit payment on the full amount indicated above.

EXHIBIT 8

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
8/27/2020	Perform detailed intake of Ramon Huerta; review client documents; attention to retention; correspond internally re: same	\$1,200	3.9					
9/25/2020	Perform research on litigation history pertaining to Defendant; Defendant's corporate structure; other culpable parties that may be named in the pleadings; and legal research re: theories of case	\$1,200	5.4					
10/1/2020	Prepare Record Request	\$1,200	0.7					
10/7/2020	Draft Initial Class Action Complaint; attention to filing and service of same	\$900				3.3		
10/7/2020	Draft PAGA Letter; attention to service of same	\$900				2.4		
12/10/2020	Review production of documents re: Plaintiff	\$900				4.3		
1/4/2021	Follow up with Opposing Counsel re: status on response to Plaintiff's meet-and-confer letter	\$900				0.4		
2/1/2021	Correspond with Defense Counsel; confer internally re: same	\$900				0.3		
3/10/2021	Correspond with Defense Counsel re: effective consolidation of class and PAGA matter; draft stipulation and amended complaint; circulate same to Defense Counsel; correspond internally re: same; attention to filing of same	\$900				4.1		
4/13/2021	Call with Ramon Huerta to provide update on case	\$900				0.5		
7/10/2021	Review of Court's Standing Order re: Complex Designation	\$900				0.7		
7/10/2021	Review of Order Granting Complex Designation	\$900				0.3		
8/26/2021	Attention to review of Answer filed by Defendant; review discovery propounded by Defendant; correspond internally re: same	\$1,200	2.6					
8/26/2021	Attention to review of Answer filed by Defendant; review discovery propounded by Defendant; correspond internally re: same	\$900				3.1		
8/26/2021	Prepare and propound written discovery, including Form Interrogatories General, Requests for Admission, Special Interrogatories and Requests for Production; attention to service of same; correspond with defense counsel re: same; correspond internally re: same	\$900				5.9		
9/14/2021	Call with Ramon Huerta to provide update on case	\$900				0.5		
9/14/2021	Prepare and revise objection to Notice of Deposition of Person Most Qualified ("PMQ"); correspond with Opposing Counsel Howard Sagaser re: same	\$900				2.1		
9/14/2021	Prepare and revise objection to Notice of Deposition of PMQ; correspond with Opposing Counsel Howard Sagaser re: same	\$1,200	0.8					
9/16/2021	Correspond with Opposing Counsel Howard Sagaser re: scheduling of Plaintiff's deposition and other discovery matters; correspond internally re: same	\$1,200	0.4					
9/16/2021	Correspond with Opposing Counsel Howard Sagaser re: scheduling of Plaintiff's deposition and other discovery matters; correspond internally re: same	\$900				1.2		
9/23/2021	Correspond with Opposing Counsel Howard Sagaser re: scheduling of Plaintiff's deposition and other discovery matters; correspond internally re: same	\$1,200	1.1					
9/23/2021	Correspond with Opposing Counsel Howard Sagaser re: scheduling of Plaintiff's deposition and other discovery matters; correspond internally re: same	\$900				1.4		
9/29/2021	Review Request for Pretrial Discovery Conference ("PTDC"); prepare opposition to same; review and revise same; attention to service of same	\$900				3.8		

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
9/29/2021	Review Request for PTDC; prepare opposition to same; review and revise same; attention to service of same	\$1,200	1.4					
10/18/2021	Perform detailed intake of Feliciano Bernabe Barrio; review client documents; attention to retention; correspond internally re: same	\$900				4.1		
10/19/2021	Perform detailed intake of Juan C. Moreno; review client documents; attention to retention; correspond internally re: same	\$900				2.8		
10/19/2021	Attention to drafting, exchanging, and jointly preparing and filing joint report	\$900				1.3		
10/20/2021	Perform detailed intake of Antonio Diaz; review client documents; attention to retention; correspond internally re: same	\$900				3.2		
10/20/2021	Perform detailed intake of Norberto Huerta; review client documents; attention to retention; correspond internally re: same	\$900				3.2		
10/21/2021	Prepare and revise wage and hour retainer agreements for Feliciano Bernabe Barrio, Juan C. Moreno, Norberto Huerta, and Antonio Diaz; correspond with clients re: same; correspond internally re: same; attention to sending record requests	\$900				5.4		
10/27/2021	Attention to First Amended Notice of Ramon Huerta; confer internally re: same; confer with client re: same	\$900				1.6		
11/3/2021	Propound Notice of Deposition of PMQ; attention to service of same; confer internally re: same	\$900				2.7		
11/10/2021	Review responses to written discovery by Defendant; draft meet-and-confer correspondence re: same; attention to service of same; correspond via email with Opposing Counsel re: same; correspond internally re: same	\$900				9.4		
11/11/2021	Review responses to written discovery by Defendant; draft meet-and-confer correspondence re: same; attention to service of same; correspond via email with Opposing Counsel re: same; correspond internally re: same	\$900				2		
11/16/2021	Meet and confer with Defendant's counsel re: outgoing discovery via email, including objections and rescheduling of Plaintiff's notice for deposition of PMQ for Defendant; confer internally re: same	\$1,200	0.8					
11/16/2021	Meet and confer with Defendant's counsel re: outgoing discovery via email, including objections and rescheduling of Plaintiff's notice for deposition of PMQ for Defendant; confer internally re: same	\$900				1.6		
11/17/2021	Serve amended notice of PMQ and meet and confer telephonically with Defendant's Counsel re: same, and other outstanding discovery issues; write internal memorandum re: same; confer internally re: same	\$900				3.1		
11/18/2021	Serve Objections to Defendant's Amended Notice of Deposition and confer with Opposing Counsel and internally re: same	\$900				0.8		
11/19/2021	Correspond with Opposing Counsel via multiple email chains re: Motion to Compel ("MTC") Deadline deadline, discovery deadlines, Amended Notice of Deposition objections, and time to get on a phone call	\$900				0.6		
11/22/2021	Email canceling deposition of Plaintiff; further schedule depositions of PMQ and Plaintiff; meet and confer with Opposing Counsel over 23 emails re: same; confer internally re: same, and, in particular, on categories in PMQ deposition notice	\$900				4.3		
11/22/2021	Review and analyze Request for PTDC; confer internally re: same	\$1,200	1.9					

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
11/22/2021	Review and analyze Request for PTDC; confer internally re: same; correspond with Opposing Counsel re: same	\$900				3.1		
11/22/2021	Email canceling deposition of Plaintiff; further schedule depositions of PMQ and Plaintiff; meet and confer with Opposing Counsel over 23 emails re: same; confer internally re: same, and, in particular, on categories in PMQ deposition notice	\$1,200	1.7					
11/23/2021	Correspond with Opposing Counsel re: record requests for Feliciano Bernabe Barrio, Juan C. Moreno, Norberto Huerta, and Antonio Diaz	\$900				0.6		
12/1/2021	Correspond with Opposing Counsel re: record requests for Feliciano Bernabe Barrio, Juan C. Moreno, Norberto Huerta, and Antonio Diaz	\$900				0.5		
12/1/2021	Correspond with Opposing Counsel re: record requests for additional Plaintiffs	\$900				0.7		
12/6/2021	Prepare and send response meet-and-confer letter to Opposing Counsel re: supplemental discovery responses and MTC deadlines	\$900				2.9		
12/6/2021	Draft, review and finalize Plaintiff's opposition to request for PTDC	\$900				3.3		
12/10/2021	Correspond with Defendant's Counsel re: supplemental responses and Motion to Compel Deadlines	\$900				0.7		
12/15/2021	Review and finalize Plaintiff's stipulation to file First Amended Complaint ("FAC") and FAC	\$900				0.5		
12/30/2021	Follow up with Opposing Counsel re: status on response to Plaintiff's meet-and-confer letter	\$900				0.3		
1/11/2022	Follow up with Opposing Counsel re: status on response to Plaintiff's meet-and-confer letter; correspond with Opposing Counsel re: same; correspond internally re: same	\$900				0.9		
1/12/2022	Participate in call with Opposing Counsel to meet and confer on discovery; email Opposing Counsel summary of contents of call and agreements reached; correspond internally re: same	\$900				3.6		
1/12/2022	Telephone Conference with Opposing Counsel re: meeting and conferring as to Defendant's Responses	\$900				0.5		
1/25/2022	Email Opposing Counsel re: supplemental discovery responses not received by deadline; review redlines to Belaire-West opt-out notice; provide feedback re: same	\$900				1.7		
2/1/2022	Correspond with Opposing Counsel re: record requests for additional Plaintiffs	\$900				0.6		
2/1/2022	Follow up with Opposing Counsel re: edits to Opt Out Notice and stipulation to add additional Plaintiffs	\$900				0.8		
2/4/2022	Review supplemental production by Defendants to Requests for Production and Special Interrogatories; review additional documents produced; correspond internally re: same	\$900				4		
2/4/2022	Correspond internally re: supplemental production from Defendant	\$1,200	1.2					
2/10/2022	Review and revise draft joint report	\$900				1		
2/10/2022	Telephone Conference with Opposing Counsel re: Meet and Confer as to Defendant's discovery responses	\$900				0.5		
2/11/2022	Finalize draft joint report	\$900				1		
2/11/2022	Follow up with Opposing Counsel on draft joint report	\$900				0.5		
2/11/2022	Review and revise request for PTDC	\$900				1		

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
2/23/2022	Email Opposing Counsel re: statements and disagreements on Joint Report edits made by Opposing Counsel, and deposition availability of Plaintiff	\$900				0.5		
3/2/2022	Email Opposing Counsel re: follow up on discovery responses and deposition dates of PMQ and Plaintiff	\$900				0.5		
3/4/2022	Telephone conference with Opposing Counsel re: extension of Motion to Compel deadline and for Plaintiff to resolve remaining discovery response issues	\$900				0.5		
3/19/2022	Email Opposing Counsel re: Defendant's reaching out to Plaintiff's and cease and desist from doing so going forward.	\$900				0.5		
3/19/2022	Review and finalize objection to Defendant's Second Amended Notice of Deposition of Plaintiff	\$900				1		
4/7/2022	Review and revise draft opposition to Defendant's MTC Deposition attendance and for Sanctions/Discovery Costs	\$900				1.2		
4/7/2022	Review and revise draft opposition to Defendant's MTC Deposition attendance and for Sanctions/Discovery Costs	\$1,200					1.2	
4/18/2022	Draft and revise joint report ahead of status conference	\$900				1		
4/18/2022	Draft and revise joint report ahead of status conference	\$1,200					1	
4/18/2022	Prepare list of discovery subjects to Third Person Privacy Interests	\$1,200					1	
4/21/2022	Attend Case Management Conference hearing	\$1,200				1		
5/31/2022	Email exchange with Opposing Counsel re: discovery conference scheduling as discovery issues persist	\$900				0.5		
5/31/2022	Review and finalize Plaintiff's meet-and-confer response letter	\$900				1		
8/3/2022	Review and finalize case management conference statement	\$1,200					1	
8/11/2022	Review and finalize First Amended Complaint, Stip, Proposed Order, PAGA Notice letter, and Opt Out Form	\$900				1		
8/11/2022	Review and finalize First Amended Complaint, Stip, Proposed Order, PAGA Notice letter, and Opt Out Form	\$1,200					1	
8/15/2022	Email exchange with team re: findings on case law re: deposition of potential class members	\$900				0.5		
8/15/2022	Email exchange with team re: findings on case law re: deposition of potential class members	\$1,200					0.5	
8/18/2022	Draft and revise joint report ahead of status conference	\$900				1		
8/18/2022	Draft and revise joint report ahead of status conference	\$1,200					1	
8/19/2022	Review minute order re: notice of withdrawal of counsel and substitution	\$900				0.5		
11/10/2022	Prepared and finalize stipulation and proposed order to continue Case Management Conference	\$900				1		
11/10/2022	Review and finalize stipulation for leave to amend First Amended Complaint	\$900				1		
11/30/2022	Attend Case Management Conference hearing	\$900				1		
12/12/2022	Prepared and finalize stipulation to amend the complaint to add additional Plaintiff's and provide to Opposing Counsel	\$900				1		
12/14/2022	Review discovery served by Defendant upon Plaintiff	\$900				0.5		
1/5/2023	Review and revise Plaintiff's discovery responses	\$900				1.2		

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
1/6/2023	Review and revise objection to Notice of Deposition of Plaintiff and Request For Production discovery responses	\$900				0.8		
1/10/2023	Follow up with Opposing Counsel on proposed changes to stipulation on leave to amend First Amended Complaint	\$900				0.5		
1/10/2023	Review and finalize Request For Production discovery responses	\$900				1.9		
1/13/2023	Review and finalize objection to Notice of Deposition of Juan Moreno	\$900				1		
1/13/2023	Review and revise draft joint report and stipulation for deadline for class certification	\$900				1		
1/19/2023	Review and finalize stipulation re: deadline for class certification	\$900				1		
1/19/2023	Review and revise draft joint report re: Case Management Conference	\$900				1		
1/20/2023	Review and finalize joint report re: Case Management Conference	\$900				1		
1/23/2023	Email Opposing Counsel re: requesting their edits on the joint report re: Case Management Conference	\$900				0.5		
1/30/2023	Review Minute order re: Case Management Conference continuance	\$900				0.5		
3/12/2023	Draft First Amended Complaint to add PAGA	\$900				1		
3/14/2023	Review and finalize First Amended Complaint	\$900				1		
3/22/2023	Review and finalize draft joint stip to continue Motion for Class Certification ("MCC") deadline	\$900				1		
4/21/2023	Review and finalize objection to Notice of Deposition of Feliciano Barrios	\$900				1		
4/21/2023	Review and finalize objection to Notice of Deposition of Juan Moreno	\$900				1		
4/21/2023	Review and finalize objection to Notice of Deposition of Norberto Huerta	\$900				1		
5/4/2023	Review and analyze answer to First Amended Complaint	\$900				1		
5/8/2023	Review Plaintiff's motion to dismiss class action allegations	\$900				1		
5/10/2023	Review and revise discovery Form Interrogatories (General) and Form Interrogatories (Employment Law) responses to J. Moreno, F. Barrios, and N. Huerta	\$900				1		
5/17/2023	Review and revise Case Management statement	\$900				0.5		
5/24/2023	Attend Case Management Conference hearing	\$900				1		
5/26/2023	Review minute order following status conference hearing	\$900				0.5		
7/24/2023	Review Stipulation to Continue MCC	\$1,000		0.4				
7/24/2023	Review Motion to Strike/Decertify	\$1,000		1.2				
7/26/2023	Review/Edit Plaintiff Discovery Responses	\$1,000		1.5				
7/26/2023	Draft Declaration Re: OSC Failure to Appear	\$1,000		1.4				
7/26/2023	Draft Declaration Re: Order Scheduling Conference re: Failure to Appear	\$1,000		1.1				
7/26/2023	Meet and confer with team re: case schedule and handling	\$1,200	1					
8/7/2023	Review/Edit Four (4) Sets of Plaintiff's Discovery Requests	\$1,000		1.3				
8/7/2023	Review Defendant's Discovery Requests	\$1,000		1.5				
9/5/2023	Discuss case with team re: discovery responses and Plaintiff's opposition to motion to dismiss	\$1,200	1					
9/12/2023	Email with Defense Regarding Case Direction	\$1,000		0.1				
9/12/2023	Email with Defense Regarding Case Direction	\$1,000		0.1				
9/13/2023	Email with Defense Regarding Case Direction	\$1,000		0.1				

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
9/14/2023	Email with Defense Regarding Case Direction	\$1,000		0.1				
9/20/2023	Prepare for Oral Argument Re: Motion to Strike/Decertify	\$1,000		1.5				
9/21/2023	Attend Hearing Re: Motion to Strike/Decertify	\$1,000		0.5				
9/23/2023	Case Analysis after Motion to Dismiss	\$1,000		1.2				
9/27/2023	Review Four (4) Sets of Defendant's Discovery Responses	\$1,000		1				
9/27/2023	Draft Meet and Confer Letter Re: Defendant's Four (4) Sets of Discovery Responses	\$1,000		2.8				
9/29/2023	Email w/ Defense Re: Case Direction	\$1,000		0.1				
10/5/2023	Email w/ Defense Re: Case Direction	\$1,000		0.1				
10/6/2023	Emails with Defense Re: Case Direction	\$1,000		0.6				
10/9/2023	Review/Edit Pre-Trial Discovery/IDC Request (PTDC)	\$1,000		0.8				
10/12/2023	Draft Case Management Statement ahead of Status Conference	\$1,000		0.4				
10/17/2023	Review Drafts of Previous Belaire Notice x 3 versions	\$1,000		0.5				
10/19/2023	Review Opp PTDC	\$1,000		0.6				
10/26/2023	Review order on request for pretrial discovery	\$1,000		0.3				
10/26/2023	Emails w/ Defense Regarding Case Direction	\$1,000		0.7				
11/3/2023	Prepare and Appear for PTDC	\$1,000		2.5				
11/14/2023	Email Belaire Notice to ILYM	\$1,000		0.2				
11/14/2023	Emails w/ Third-Party Administrator ILYM Re: Belaire-West Process	\$1,000		0.4				
11/14/2023	Draft Updated Belaire West Notice	\$1,000		0.4				
11/21/2023	Call with Plaintiff Regarding Status of Case	\$1,000		0.3				
11/30/2023	Email w/ Defense Regarding Case Direction	\$1,000		0.1				
12/11/2023	Email w/ Defense Regarding Case Direction	\$1,000		0.1				
12/14/2023	Email w/ Defense Regarding Case Direction	\$1,000		0.1				
12/19/2023	Research Legal Issues Relating to Plaintiff's Motion to Compel Further Responses	\$1,000		1.2				
1/10/2024	Emails with ILYM Re: Belaire Data	\$1,000		0.4				
1/17/2024	Draft & Review CMS	\$1,000		0.5				
1/25/2024	Email w/ Defense Regarding Case Direction	\$1,000		0.1				
1/25/2024	Attend Informal Discovery Conference	\$1,000		1.2				
1/25/2024	Review hearing memo provided by Sarah	\$1,200	0.5					
1/26/2024	Meet and Confer Call w/ Defense Regarding Discovery Issues	\$1,000		0.8				
2/7/2024	Emails w/ Defense and ILYM Re: Belaire	\$1,000		0.2				
2/12/2024	Emails w/ Defense and ILYM Re: Belaire	\$1,000		0.3				
2/23/2024	Emails w/ Defense Re: Belaire Process	\$1,000		0.8				
2/28/2024	Review Belaire Status Report	\$1,000		0.2				
2/29/2024	Emails w/ Defense Regarding Case Direction	\$1,000		0.5				
3/5/2024	Email w/ Defense Regarding Case Direction	\$1,000		0.1				
3/6/2024	Review Belaire Status Report	\$1,000		0.2				
3/12/2024	Email w/ Defense Re: Mediation	\$1,000		0.2				
3/12/2024	M&C Email w/ Defense Re: Discovery & Mediation	\$1,000		0.8				
3/13/2024	Meet and Confer w/ Defense	\$1,000		0.9				
3/14/2024	Review Belaire Status Report	\$1,000		0.2				
3/18/2024	Email w/ Defense Regarding Case Direction	\$1,000		0.1				

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
3/21/2024	Email w/ Defense Regarding Case Direction	\$1,000		0.1				
3/22/2024	Analyze Belaire Opt Out Percentage	\$1,000		0.4				
3/22/2024	Review and revise Opt Out List	\$1,200	1					
3/24/2024	Create Interview Questions Re: Belaire w/ Case Analysis	\$1,000		2.5				
3/25/2024	Follow Up Email w/ Defense	\$1,000		0.1				
3/25/2024	Email w/ Defense Re: Mediator Analysis	\$1,000		0.3				
3/26/2024	Emails w/ Defense Re: Case Direction	\$1,000		0.1				
3/26/2024	Emails w/ Defense Re:Case Direction	\$1,000		0.2				
3/26/2024	Team discussion re: mediation list and proposing mediators	\$1,200	0.7					
3/27/2024	Belaire West Meet and Confer	\$1,000		0.7				
3/27/2024	Emails w/ Defense Re: Case Direction	\$1,000		0.7				
3/27/2024	M&C w/ Defense Re: 25 Mediators	\$1,000		1.5				
3/27/2024	M&C w/ Defense Re: 25 Mediators	\$1,000		1.5				
3/28/2024	Email w/ Defense Re: Case Direction	\$1,000		0.1				
3/28/2024	M&C w/ Defense	\$1,000		0.6				
3/29/2024	Emails Arranging Mediation w/ Mediator (3/29/24-4/11/24)	\$1,000		1				
3/29/2024	Meet and Confer with Opposing Counsel re: proposed mediators and mediation	\$1,200	0.8					
4/5/2024	Email w/ Third-Party Administrator Re: Belaire Missing Phone Numbers	\$1,000		0.3				
4/5/2024	PTDC Drafting/Review Re: Belaire Issues	\$1,000		1.8				
4/10/2024	2nd Round Drafting Meet and Confer Re: Belaire Issues	\$1,000		0.8				
4/16/2024	CMS Drafting	\$1,000		0.4				
4/17/2024	Joint CMS Review & Emails w/ Defense Re: Case Direction	\$1,000		0.8				
4/26/2024	Review Stipulation Re: Mediation	\$1,000		1.2				
4/26/2024	Review Informal Discovery Requests Re: Mediation	\$1,000		1.5				
5/6/2024	Meet and Confer Re: Discovery & Draft meet-and-confer Email	\$1,000		1.5				
6/10/2024	Review of the file in preparation for the mediation with Judge Raul Ramirez (ret.)	\$600			1.4			
7/3/2024	Email Re: Mediation Call	\$1,000		0.2				
7/10/2024	Emails w/ Defense Regarding Case Direction (7/10/24-7/17/24)	\$1,000		0.5				
7/15/2024	Pre-Mediation Call w/ Mediator	\$1,000		1.2				
7/15/2024	Pre-mediation telephonic conference with Judge Raul Ramirez (ret.)	\$600			0.6			
7/16/2024	Review of Expert Data for Mediation (7/16/24-7/30/24)	\$1,000		5				
7/16/2024	Email to experts regarding analysis for mediation	\$600			0.5			
7/17/2024	Team discussion re: case status and providing update to mediator	\$1,200	0.3					
7/20/2024	Document review for mediation	\$600			1.8			
7/21/2024	Drafting of mediation brief for mediation	\$600			3.2			
7/22/2024	Drafting of mediation brief for mediation	\$600			3.9			
7/23/2024	Review of Mediation Brief & Exhibits	\$1,000		2.3				
7/30/2024	Exposure model highlighting Defendant's liability for mediation	\$600			1.7			
8/1/2024	Attend Mediation	\$1,000		10				
8/1/2024	Attend Mediation W/ Judge Raul Ramirez (ret.)	\$600			7.4			
8/1/2024	Plan and attend mediation	\$1,200	8.2					
8/2/2024	Email w/ Defense Regarding Case Direction	\$1,000		0.1				

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
8/2/2024	Email w/ Defense Regarding Case Direction	\$1,000		0.1				
8/2/2024	Email w/ Defense Regarding Case Direction	\$1,000		0.1				
8/2/2024	Email review regarding discovery dispute and deposition dates of Defendant's PMQ	\$600			0.3			
8/2/2024	Email to Opposing Counsel regarding deposition dates and discovery issues	\$600			0.4			
8/2/2024	Review post mediation memo	\$1,200	0.5					
8/3/2024	Email review regarding discovery dispute as to the location where time and pay records need to be produced	\$600			0.4			
8/3/2024	Email review regarding discovery dispute as to the location where time and pay records need to be produced	\$600			0.2			
8/3/2024	Email review regarding discovery dispute as to the location where time and pay records need to be produced	\$600			0.4			
8/6/2024	Lengthy Meet and Confer Emails w/ Defense Re: Depositions	\$1,000		0.8				
8/24/2024	Phonecall with client Norberto Huerta	\$600			0.7			
9/2/2024	Lengthy Meet and Confer Emails w/ Defense Re: Discovery (9/2/24-9/30/24)	\$1,000		3				
9/3/2024	Email to Opposing Counsel regarding the production of Defendant's full class contact information	\$600			0.3			
9/22/2024	Preparation of joint report ahead of case management conference	\$600			0.4			
9/25/2024	Joint Statement	\$1,000		0.7				
9/27/2024	Review of the class contact list produced by Defendant	\$600			0.7			
10/3/2024	Attendance at Case Management Conference in Fresno County Superior Court	\$600			0.4			
10/7/2024	Review of the discovery responses provided by Defendant	\$600			4.3			
10/14/2024	Email asking Defendant to produce requisite information such that Plaintiffs may hire someone to copy and inspect the time and pay records at Defense Counsel's office	\$600			0.3			
10/15/2024	Preparation of questionnaire with questions to ask class members regarding their experiences with Defendant	\$600			0.7			
10/22/2024	Email to Defense Counsel clarifying the state the time and pay records would be in for the physical copying and inspecting	\$600			0.2			
10/31/2024	Review of a completed questionnaire provided by a putative class member	\$600			0.2			
11/1/2024	Review of a completed questionnaire provided by a putative class member	\$600			0.2			
11/14/2024	Review of a completed questionnaire provided by a putative class member	\$600			0.5			
12/10/2024	Review PTDC	\$1,000		0.8				
12/10/2024	Request for Pre Trial Discovery Conference Statement	\$600			1.3			
12/11/2024	Review Person Most Knowledgeable Notice & Topics	\$1,000		1.2				
12/11/2024	Person Most Qualified Deposition Notice Preparation	\$600			0.7			
12/12/2024	Email w/ Defense Regarding Case Direction	\$1,000		0.1				
12/12/2024	Review of the file to ascertain number of completed questionnaires, status of discovery, and status of the pleadings	\$600			0.6			
12/18/2024	Email w/ Defense Regarding Case Direction	\$1,000		0.1				
12/18/2024	Discussion with our Third-Party Administrator regarding the specifics of the physical copying of the time and pay records	\$600			0.6			

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
12/18/2024	Email memorializing conversation with administrator about engaging of their services regarding the copying of time and pay records	\$600			0.3			
12/18/2024	Email to Defense counsel about setting up a time to have Third-Party Administrator copy and inspect time and pay records	\$600			0.3			
12/20/2024	Review Objections to Deposition Notice	\$600		0.5				
12/23/2024	Review of second amended person most qualified deposition notice	\$600			0.3			
1/7/2025	Review of Deposition Notice of Custodian of Records	\$1,000		0.8				
1/7/2025	Custodian of Record Deposition Notice Preparation	\$600			0.8			
1/22/2025	Joint Statement Reiew	\$1,000		0.4				
1/27/2025	Review of Notice of Deposition of Feliciano Bernabe Barrios w/ Request for Production Form Interrogatories – Employment Law, Set One Form Interrogatories – General, Set One Request for Admissions, Set One to Feliciano Bernabe Barrios Notice of Deposition of Juan Carlos Moreno Lopez w/ Request for Production Form Interrogatories – Employment Law, Set One Form Interrogatories – General, Set One Request for Admissions, Set One to Juan Carlos Moreno Lopez Notice of Deposition of Antonio Diaz w/ Request for Production Form Interrogatories – Employment Law, Set One Form Interrogatories – General, Set One Request for Admissions, Set One to Antonio Diaz Notice of Deposition of Norberto Huerta Martinez w/ Request for Production Form Interrogatories – Employment Law, Set One Form Interrogatories – General, Set One Request for Admissions, Set One to Norberto Huerta Martinez	\$1,000		3.5				
1/27/2025	First deposition of Defendant's PMQ on the topics identified in Plaintiffs' PMQ deposition notice	\$600			7.1			
1/29/2025	Review of: NOTICE OF DEPOSITION LAKHGIR SINGH NOTICE OF DEPOSITION GAGAN BATTH PLAINTIFFS' AMENDED NOTICE OF DEPOSITION OF CUSTODIAN(S) OF RECORDS FOR DEFENDANT BATTH FARMS, INC.	\$1,000		2.6				
2/21/2025	Email exchange with team re: case schedule and Plaintiff depositions	\$1,200	0.6					
3/4/2025	Email to Defense counsel regarding the scheduling of Plaintiffs' depositions	\$600			0.3			
3/5/2025	Review Defense opposition to PTDC	\$1,000		0.7				
3/5/2025	Review of Defendant's opposition to Plaintiff's request for an informal discovery conference	\$600			0.4			
3/6/2025	Emails w/ Defense Regarding Case Direction	\$1,000		0.5				
3/6/2025	Review of emails to prepare for the informal discovery conference	\$600			0.7			

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
3/10/2025	Emails Defense Regarding Case Direction	\$1,000		0.6				
3/10/2025	Review of: Def Batth Farms EFROGS, Set 2 for Plf. R. Huerta Def Batth Farms GFROGS, Set 2 for Plf. R. Huerta Def Batth Farms EFROGS, Set 2 for Plf. N. H. Martinez Def Batth Farms GFROGS, Set 2 for Plf. N. H. Martinez Def Batth Farms GFROGS, Set 2 for Plf. J. C. Moreno Lopez Def Batth Farms EFROGS, Set 2 for Plf. J. C. Moreno Lopez Def Batth Farms GFROGS, Set 2 for Plf. A. Diaz Def Batth Farms EFROGS, Set 2 for Plf. A. Diaz Def Batth Farms EFROGS, Set 2 for Plf. F. B. Barrios Def Batth Farms GFROGS, Set 2 for Plf. F. B. Barrios	\$1,000		3.9				
3/11/2025	Emails w/ Defense Regarding Case Direction	\$1,000		0.5				
3/12/2025	Meet and confer call with Defense counsel to discuss discovery dispute regarding outstanding depositions and outstanding discovery responses	\$600			0.6			
3/13/2025	Review of: Defendants Responses and Objections to the Notice of Deposition of Gagan Batth and Request for Production of Documents; Defendants Responses and Objections to the Notice of Deposition of Lakhgir Singh and Request for Production of Documents; and Defendants Responses and Objections to the Notice of Deposition of Head of Human Resources and Request for Production of Documents.	\$1,000		2.6				
3/14/2025	Review of: Third Amended Notice of Deposition of Plaintiff Feliciano Barrios and Request for Production of Documents; Third Amended Notice of Deposition of Plaintiff Juan Moreno and Request for Production of Documents; Third Amended Notice of Deposition of Plaintiff Norberto Huerta and Request for Production of Documents; and Third Amended Notice of Deposition of Plaintiff Antonio Diaz and Request for Production of Documents.	\$1,000		2.8				
3/20/2025	Review Joint Statement	\$1,000		0.4				
3/24/2025	Review Email from Defense	\$1,000		0.1				
3/25/2025	Call with putative class member Horacio Torres regarding the case and his experiences with Defendant	\$600			1.2			
3/25/2025	Email exchange with Blackstone re: 1.5.1 and notice of association	\$1,200	0.5					
3/26/2025	Email w/ Defense	\$1,000		0.1				
3/27/2025	Email w/ Defense	\$600						
3/27/2025	Call with client Ramon Huerta	\$600			0.9			

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
3/27/2025	Attendance at the case management conference in Fresno County Superior Court	\$600			0.5			
3/27/2025	Email w/ Defense	\$1,000		0.1				
3/28/2025	Review Discovery Responses & Objections	\$1,000		2.3				
3/28/2025	Call with client Antonio Perez	\$600			0.4			
4/8/2025	Review of discovery responses provided by Defendant	\$600			1.3			
4/9/2025	Review Defense Discovery Meet and Confer Email	\$1,000		0.4				
4/10/2025	Email to Defense Counsel regarding rescheduling the informal discovery conference and requesting extensions to deadline to reply to discovery requests	\$600			0.3			
4/11/2025	Review Amended Deposition Notice	\$1,000		0.3				
4/11/2025	Review Opp PTDC	\$1,000		0.6				
4/11/2025	Review of email correspondence from defense counsel regarding extension to respond to discovery requests	\$600			0.2			
4/17/2025	Review Opposition to Deposition Notice	\$1,000		0.3				
4/18/2025	Review Requests for Production of Documents (Set Two)	\$1,000		0.8				
4/18/2025	Call with putative class member Carlos SantaCruz regarding the case and his experiences with Defendant	\$600			1.2			
4/22/2025	Review Special Interrogatories (Set Two)	\$1,000		0.9				
4/25/2025	Deposition Preparation	\$1,000		3				
4/30/2025	Discovery Response Review for Multiple Plaintiffs	\$1,000		1.8				
5/1/2025	Deposition Objection Review	\$1,000		0.4				
5/1/2025	Document Production Review	\$1,000		2.5				
5/2/2025	Deposition Objection Review	\$1,000		0.3				
5/5/2025	Preparing client Juan Carlos Moreno for his upcoming deposition	\$600			1.2			
5/5/2025	Preparing client Antonio Perez for his upcoming deposition	\$600			0.8			
5/6/2025	Deposition Defense & Preparation	\$1,000		12				
5/7/2025	Email w/ Defense	\$1,000		0.1				
5/8/2025	Review of Defense PTDC	\$1,000		0.5				
5/8/2025	Review of Deposition Objections	\$1,000		0.6				
5/13/2025	Review of Plaintiffs' PTDC	\$1,000		0.4				
5/15/2025	Call with putative class member Julio Chavez regarding the case and his experiences with Defendant	\$600			0.5			
5/22/2025	Review of Opp PTDC	\$1,000		0.7				
5/22/2025	Call with class certification expert regarding the retention of their services	\$1,000			0.4			
5/27/2025	Review Discovery Meet and Confer	\$1,000		1.2				
5/28/2025	Review Discovery Meet and Confer	\$1,000		0.6				
5/29/2025	Review Discovery Meet and Confer	\$1,000		0.5				
6/1/2025	Review of the deposition transcript from the deposition of Antonio Perez	\$600			1.1			
6/3/2025	Email w/ Defense	\$1,000		0.1				
6/5/2025	Emails with Defense	\$1,000		0.4				
6/6/2025	Review of Defense Document Production	\$1,000		1				
6/7/2025	Email to Defense counsel discussing outstanding depositions	\$600			0.7			
6/9/2025	Review Motion to Compel ("MTC") Further Responses	\$1,000		1.5				

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
6/9/2025	Drafting of the Motion to Compel Further Responses in regards to outstanding time and pay records from Defendant	\$600			9.4			
6/10/2025	Drafting of the Motion to Compel Further Responses in regards to outstanding time and pay records from Defendant	\$600			4.15			
6/11/2025	Drafting of the Motion to Compel Further Responses in regards to outstanding time and pay records from Defendant	\$600			4.1			
6/12/2025	Meeting with expert for class certification discussing scope of claims and information needed for analysis	\$600			0.6			
6/25/2025	Review Opposition to request for PTDC	\$1,000		0.4				
7/1/2025	Review of the deposition transcript for the deposition of Juan Carlo Moreno	\$600			1.4			
7/15/2025	Strategy Meeting	\$1,000		0.6				
7/15/2025	Internal strategy Meeting for the case and the case direction	\$600			0.6			
7/16/2025	Review Opp MTCs (Combined)	\$1,000		2.8				
7/21/2025	Drafting of PLaintiffs' reply brief for Motion to Compel Further Responses	\$600			5			
7/22/2025	Review Reply MTCs (Combined)	\$1,000		1.8				
7/23/2025	Review Plaintiff's MTCs (Set Two)	\$1,000		2.3				
7/28/2025	Drafting of the Amended PAGA notice	\$600			0.9			
7/29/2025	Drafting of the Second Amended Complaint	\$600			1.1			
8/6/2025	Review Opp MTCs (Set Two)	\$1,000		1.8				
8/8/2025	Review and edits of the common interest and litigation form with Sikh Coalition	\$600			1.1			
8/10/2025	Review of Defendant's opposition to Plaintiff's Motion to Compel	\$600			1			
8/19/2025	Reply brief for Motion to Compel Further Responses for Plaintiffs' Second Set of Special Interrogatories	\$600			2.3			
8/21/2025	Review PTDC	\$1,000		0.4				
8/22/2025	Deposition preparation for Plaintiff Feliciano Barrios	\$600			1.1			
8/25/2025	Drafting of Objections to the deposition of Feliciano Barrios	\$600			0.6			
8/26/2025	Hearing on Plaintiffs' Motion to Compel Further Responses	\$600			2.3			
8/29/2025	Review Deposition Exhibits	\$1,000		0.9				
8/29/2025	Defense of the deposition of Plaintiff Feliciano Barrios	\$600			8.1			
9/3/2025	Review Deposition Subpoenas	\$1,000		0.4				
9/3/2025	Review Deposition Subpoenas	\$1,000		0.5				
9/8/2025	Review of email to Defense Counsel regarding a potential second mediation	\$600			0.4			
9/9/2025	Preparation of email to Defense Counsel regarding a potential second mediation	\$600			0.3			
9/10/2025	Review Meet and Confer Emails Regarding Discovery Issues	\$1,000		1.2				
9/10/2025	Further review and preparation of email to Defense counsel regarding the possibility and terms for a second mediation	\$600			0.4			
9/11/2025	Review Opp MTC	\$1,000		0.8				
9/12/2025	Review of discovery responses provided by Defendant	\$600			2.3			
9/14/2025	Review of discovery responses provided by Defendant	\$600			1.4			
9/18/2025	Meeting with survey expert	\$600			1.1			

Date	Task	Hourly Rate	David Bibiyan, Esq.	Sarah Cohen, Esq.	Rafael Yeodan, Esq.	Diego Aviles, Esq.	Robert Wilson, Esq.	Vedang J. Patel, Esq.
9/20/2025	Review of the file to ascertain how many declarations have been signed, discovery that Plaintiffs have, and the status of the pleadings ahead of class certification deadlines	\$600			2.1			
9/22/2025	Discovery Response Review for Multiple Plaintiffs	\$1,000		2.3				
9/24/2025	Hearing on Plaintiff's Motion to Compel Further Responses	\$600			1.3			
9/25/2025	Extensive review of file ahead of mediation	\$1,000		2.8				
10/1/2025	Mediation Brief Review	\$1,000		1.5				
10/1/2025	Mediation Exhibits Analysis	\$1,000		3				
10/1/2025	Preparation of mediation brief for the second mediation in this case	\$1,200	0.5		0.7			
10/1/2025	Preparation of mediation brief for the second mediation in this case	\$1,200	0.5		2.1			
10/3/2025	Review of Motion for Reconsideration	\$1,000		1.2				
10/3/2025	Review of Defendant's Motion for Reconsideration	\$600			2.3			
10/5/2025	Telephone conference re: Mediation strategy with team prior to mediation	\$1,200	0.5					
10/5/2025	Damages model for the second mediation in this matter	\$1,200	0.5		1.3			
10/6/2025	Mediation with Monique Ngo Bonnici	\$600			8.2			
10/6/2025	Prepare Memorandum of Understanding	\$600			1.2			
10/6/2025	Plan and attend mediation	\$1,200	8.2					
12/12/2025	Review of the file to determine whether there are any outstanding deadlines with the court, with discovery, or with the LWDA	\$600			2.3			
2/18/2026	Review and draft long form settlement agreement in conjunction with co-counsel	\$900						1.1
2/27/2026	Review email from defense counsel re: long form agreement	\$900						0.1
3/5/2026	Further review and edit long form settlement agreement	\$900						1.2
3/3/2026	Email Opposing Counsel re: advising Opposing Counsel that court has allowed to move forward with MTC re: Defendant's discovery responses	\$600			0.1			
5/29/2026	Team discussion re: Blackstone to get signature of clients on settlement agreement	\$1,200	0.3					
8/6/2026	Meet and confer session with co-counsel re: plan of action regarding a deceased Plaintiff	\$900						1.1
8/13/2026	Review and assess Second Amended Complaint	\$900						1.3
8/13/2026	Review and assess amendment to the settlement agreement	\$900						0.8
8/13/2026	Review and assess request for dismissal pertaining to a Plaintiff	\$900						0.9
8/13/2026	Review and assess additional revisions to class notice	\$900						0.8
		TOTAL	47.5	155	127.05	145.7	6.7	7.3
							Total Hours	489.25
							Total Billing	\$433,970