

ZAKAY LAW GROUP, APLC

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Counsel for Plaintiff MOHAMMAD ALAVICHEH

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

MOHAMMAD ALAVICHEH; an individual,
on behalf of himself and on behalf of other
Aggrieved Employees and the State of
California,

Plaintiff,

v.

SUBURBAN BUICK GMC CADILLAC,
LLC., a Michigan Limited Liability Company;
and DOES 1-50, Inclusive,

Defendant.

Case No.: 30-2021-01181315-CU-OE-CXC

[Assigned for all purposes to Hon. Glenda Sanders,
Dept. CX101]

**DECLARATION OF SHANI O. ZAKAY IN
SUPPORT OF MOTION FOR APPROVAL OF
PAGA SETTLEMENT**

Hearing Date: September 2, 2022
Hearing Time: 1:30 p.m.

Dept.: CX101
Judge: Glenda Sanders

Action Filed: January 27, 2021

1. I am the managing partner of Zakay Law Group, APLC, and co-counsel of record for Plaintiff MOHAMMAD ALAVICHEH, in his representative capacity on behalf of the State of California and fellow Aggrieved Employees, ("Plaintiff") in this matter. As such, I am fully familiar with the facts, pleadings and history of the matter.

2. This declaration is being submitted in support of Plaintiffs' Motion to Approve the Settlement Agreement Pursuant to the Labor Code Private Attorneys General Act of 2004.

1
2 **I. EXPERIENCE**

3 3. Over the course of the litigation during the 18 months a number of attorneys have worked
4 on this matter. Their credentials are reflected in the Zakay Law Group, APC firm resume, a true and
5 correct copy of which is attached hereto as Exhibit #1. Some of the major cases my firm has undertaken
6 are also set forth in Exhibit #1. The attorneys involved in this matter have had class litigation experience,
7 much of it in employment class actions, unfair business practices and other complex litigation. I have
8 experience in cases involving labor code violations and meal and rest break claims. Counsel have
9 litigated similar labor law cases against other employers on behalf of employees. Counsel have been
10 approved as experienced Counsel throughout California. It is this level of experience which enabled the
11 firms to undertake the instant matter and to successfully combat the resources of the defendant and their
12 capable and experienced counsel. Because of the concerted and dedicated effort this case required to
13 properly handle and prosecute, Counsel were precluded from taking other cases, and in fact, had to turn
14 away other potential fee generating cases.

15 **II. LOADSTAR AND REQUESTED COUNSEL FEES PAYMENT**

16 4. As of August 8, 2022, Zakay Law Group, APC incurred lodestar totaling \$30,240.00 in
17 this matter. I have reviewed my firm's lodestar in this matter and believe the charges are reasonable
18 and were reasonably necessary to the conduct of the case. From February through July 2022, my firm
19 has worked more than 76.4 hours prosecuting these claims with the attorneys' hourly fee rates for
20 attorneys at \$350-\$550, resulting in the current lodestar. A detailed breakdown of the total fees and
21 the services performed by the firm on this case is attached hereto as Exhibit #2.

22 5. Further, Class Counsel will be performing additional work, including attending the
23 hearing on settlement approval, finalizing the orders and judgment, and monitoring completion of the
24 settlement process -over the course of several years. I expect this additional work will result in an
25 additional 20-30 hour of additional work and an additional loadstar between \$11,000 and \$16,500.

26 6. The rates charged by my firm are in line with the prevailing rates of attorneys in the local
27 legal community for similar work and, if this were a commercial matter, these are the charges that would
28

1 be made and presented to the client. These hourly rates have been approved by Court's throughout
2 California, including the Courts in the Superior Court of California. Finally, the reasonableness of
3 Counsel's hourly rates is further confirmed by comparing such rates with the rates of comparable counsel
4 practicing complex and class litigation as detailed in the National Law Journal Billing Survey. See e.g.
5 *Zest IP Holdings, LLC v. Implant Direct MFG, LLC*, 2014 U.S. Dist. LEXIS 167563 (S.D. Cal. 2014)
6 (finding that "Mayer Brown's \$775 average billing rate for partners" and "Mayer Brown's \$543 average
7 associate billing rate" are reasonable rates when compared within 21 other firms practicing in the
8 Southern District of California). This survey is useful to show that Counsel's rates are in line with the
9 comparable rates of the defense counsel that opposes these types of class claims, such as Mayer Brown.
10 In another example, Sheppard Mullin Richter & Hampton, who is opposing counsel in many cases
11 prosecuted by Counsel charges rates as high as \$875 for partners and \$535 for associates. Similarly,
12 Paul Hastings, another opposing counsel in these types of cases, charges between \$900 and \$750 for
13 partners and \$755 and \$335 for associates. Thus, the rates charged by Counsel for comparable work are
14 less than these examples, and are therefore undoubtedly reasonable.

15 **III. COSTS**

16 7. As part of the Settlement Agreement, the parties agreed that Counsel may seek
17 reimbursement of expenses incurred as documented in Counsel's billing records as part of the Counsel
18 Award. Attached hereto as Exhibit #2 is a true and correct copy of the Zakay Law Group, Cost Summary
19 detailing the actually incurred litigation expenses by the Zakay Law Group APLC, for this matter as of
20 July 7, 2022. As shown in detail in the attached Cost Summary, the Zakay Law Group incurred a total
21 of \$4,464.49 in litigation costs prosecuting this action– with additional costs anticipated.

22 8. These litigation expenses include the expenses incurred for mediation fees, expert costs
23 and fling fees, all of which are costs normally billed to and paid by the client. The costs were reasonably
24 incurred by Counsel in the prosecution of this matter and are set forth in detail in the contemporaneous
25 billing records attached hereto.

26
27 ///

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct. Executed this 8th day of August 2022, at San Diego, California.

3
4 By:  _____

5 Shani O. Zakay
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EXHIBIT 1

Zakay Law Group, APC
3990 Old Town Ave. Suite C204
San Diego, California 92110
Telephone: (619) 255-9047
Fax: (858) 404-9203

1. Firm Practice Areas:

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, Civil Litigation, Business Litigation, Corporate/Business General Counsel Advice.

2. Attorney Shani O. Zakay Biography:

• **PRACITCE AREAS**

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, Civil Litigation, Business Litigation, Corporate/Business General Counsel Advice.

• **BAR ADMISSIONS, MEMBERSHIPS & BOARDS**

State of California (all courts)
United States District Court of California (all courts)
United States District Court of Indiana for the Northern District
United States Court of Appeals for the 9th Circuit

• **PROFESSIONAL EXPERIENCE**

ZAKAY LAW GROUP, APLC, San Diego, CA
Founder, April 2018

SILLDORF LAW, LLP, San Diego, CA (now known as Berding & Weil)
Partner, January 2012 – March 2018

• **EDUCATION**

CALIFORNIA WESTERN SCHOOL OF LAW, San Diego, CA

Juris Doctor, *magna cum laude*, April 2011

Honors: Dean's List: Spring 2009, Fall 2009, Spring 2010, Fall 2010, Spring 2011.

Academic Achievement Awards: Advanced Legal Research, Constitutional Law II, Criminal Procedure, Insurance Law & Litigation, Law Office Technologies, Property II, Products Liability, Trusts & Estates.

Activities: Associate Editor, *California Western Law Review*
Legal Skills Honor Instructor for Professor Leslie Culver
Vice President, Jewish Student Union

SAN DIEGO STATE UNIVERSITY, San Diego, CA

Bachelor of Science, Business Administration, Management, *cum laude*, May 2008

Honors: Dean's List: Spring 2007 and Fall 2007

- **COMMUNITY SERVICE**

CALIFORNIA WESTERN SCHOOL OF LAW, San Diego, CA
Spring 2016, 2018
Moot Court Judge

COMMUNITY LAW PROJECT, San Diego, CA
October 2018 – Present
Volunteer Attorney on Employment Matters

3. **Attorney Jackland K. Hom Biography:**

- **PRACTICE AREAS**

Employment Litigation, Employment Class Action, Wage and Hour Class Actions, Civil Litigation.

- **BAR ADMISSIONS, MEMBERSHIPS & BOARDS**

State of California (all courts)
United States District Courts of California (all courts)

- **PROFESSIONAL EXPERIENCE**

ZAKAY LAW GROUP, APLC, San Diego, CA
Associate, January 2021 - present

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP, San Diego, CA
Associate, November 2019 – September 2020

- **EDUCATION**

CALIFORNIA WESTERN SCHOOL OF LAW, San Diego, CA
Juris Doctor, April 2019

Honors: Dean's List: Fall 2017, Spring 2018.

Academic Achievement Awards: Advanced Prosecution Function.

Activities: Senior Editor, *California Western Law Review*
President, Asian Pacific American Law Students Association

UNIVERSITY OF CALIFORNIA, RIVERSIDE, Riverside, CA
Bachelor of Arts: Political Science, English Literature, June 2015
Honors: Dean's List

4. Class Action & Representative Cases:

1. Hubscher v. Bodyspirit, LLC

Court	San Diego
Case No.	37-2016-00021261-CU-OE-CTL
Nature	Independent Contractor Misclassification
Status	Settled

2. Henry v. InMotion Entertainment Group, LLC

Court	San Francisco
Case No.	CGC-18-565643
Nature	Meal/Rest Break claims and overtime and regular rate claims
Status	Settled

3. Moore v. Zirx Transportation

Court	San Francisco
Case No.	CGC-18-566655
Nature	Independent Contractor Misclassification
Status	Settled

4. Pasallo v. GSG Protective Services

Court	San Diego
Case No.	37-2018-00037611-CU-OE-CTL
Nature	Meal/Rest Break claims
Status	Settled

5. Villaroman v. C.C.H.C.

Court	Orange County
Case No.	30-2018-01013128-CU-OE-CXC
Nature	Meal/Rest Break claims
Status	Settled

6. Flores v. Plastic Express

Court	Los Angeles
Case No.	BC719071
Nature	Meal/Rest Break and minimum wage claims
Status	Settled

7. Tressler v. Spoonful Management

Court	Los Angeles
Case No.	BC719405
Nature	Meal/Rest Break claims
Status	Settled

8. Leymaster v. Toms Sierra Company, Inc.

Court	Placer
Case No.	SCV0041735
Nature	Meal/Rest Break claims and overtime and regular rate claims
Status	Settled

9. Murphy v. Rockler Retailer Group, Inc.

Court	Sacramento
Case No.	34-2018-00241374
Nature	Overtime and regular rate claims and wrongful termination
Status	Settled

10. Bruemmer v. Tempur Retail Stores, LLC.

Court	Marin
Case No.	CIV1803646
Nature	Overtime and regular rate claims and wrongful termination
Status	Settled

11. Christina Cummings v. G6 Hospitality, LLC

Court	San Diego
Case No.	37-2018-00056207-CU-OE-CTL 19CV122 GPC LL
Nature	Overtime and Minimum Wage claims and Meal and Rest Breaks
Status	Settled

12. Nicolai Laguatan v. Prevent LSS

Court	San Diego
Case No.	37-2018-00057434-CU-OE-CTL
Nature	Overtime and Minimum Wage claims and Meal and Rest Breaks
Status	Settled

13. Lisa Ramirez v. Carefusion Resources, LLC

Court	San Diego
Case No.	37-2018-00058078-CU-OE-CTL 3:18-CV-02852-BEN-MSB
Nature	Overtime and Meal and Rest Breaks
Status	Settled

14. Charles Ornelas v. C&A Transportation Services

Court	San Diego
Case No.	37-2018-00061289-CU-OE-CTL
Nature	Minimum Wage and Meal/Rest Break claims
Status	Settled

15. Luz Marin v. California Marine Cleaning

Court	San Diego
Case No.	37-2018-00063483-CU-OE-CTL
Nature	Meal Break claims
Status	Settled

16. Christian Van Cleave v. Sunrise Senior Living Management

Court	San Diego
Case No.	37-2018-00061960-CU-OE-CTL 19CV0044BEN NLS
Nature	Regular rate and meal premium miscalculation
Status	Settled

17. Heather McIntyre v. JRR Enterprises

Court	Sacramento
Case No.	34-2019-00251220
Nature	Overtime and Meal and Rest Periods
Status	Settled

18. Lori Phipps v. Soapy Joe's

Court	San Diego
Case No.	37-2019-00017673-CU-OE-CTL
Nature	Tip Polling and Meal and Rest Periods
Status	Settled

19. Heather Broughton v. NFG San Francisco, LLC

Court	San Francisco
Case No.	CGC-19-574657
Nature	Meal and Rest Breaks
Status	Settled

20. Marcos Antonios v. Interface Rehab, LLC

Court	Orange County
Case No.	30-2019-01067547-CU-OE-CXC
Nature	Meal and Rest Breaks and Reporting Time Violations
Status	Settled

21. Tiffany Rodriguez v. Circle K

Court	Riverside
Case No.	RIC 1901407 5:19-cv-00469
Nature	Overtime Wage and Meal/Rest Break claims
Status	Settled

22. Derik Scott et al. v. Ultimate Performance

Court	Los Angeles
Case No.	19STCV22823
Nature	Piece Rate Pay violations
Status	Settled

23. Raymond Frazier v. Asa Carlton

Court	San Diego
Case No.	37-2019-00036147-CU-OE-CTL
Nature	Overtime Wages
Status	Settled

24. John Moreno v. Da Kitchen

Court	San Diego
Case No.	37-2019-00024885-CU-OE-CTL
Nature	Overtime Wage and Meal/Rest Break claims
Status	Settled

25. Penny Lane v. International Aero Clubs, LLC

Court	San Diego
Case No.	37-2019-00021793-CU-OE-CTL
Nature	Meal and Rest Breaks and Regular Rate Miscalculation
Status	Settled

26. Amber Price v. DMSD Restaurants

Court	San Diego
Case No.	37-2019-00024062-CU-OE-CTL
Nature	Meal and Rest Break violations
Status	Settled

27. Jamaal Johnson v. Volt Management Corp

Court	Los Angeles
Case No.	19STCV16466
Nature	On Duty Meal Break violations
Status	Settled

28. Ezzat Menias v. All American Private Security

Court	Orange County
Case No.	30-2019-01085120-CU-OE-CXC
Nature	On Duty Meal Break violations
Status	Settled

29. Mark Connor v. Ascendant Marketing

Court	San Diego
Case No.	37-2019-00026864-CU-OE-CTL
Nature	Minimum Wage violations
Status	Settled

30. Niki Nunez v. Home Depot

Court	San Joaquin
Case No.	STK-CV-406-2019-6656
Nature	Overtime Wages violations
Status	Settled

31. Alma Salazar v. Frontier Toyota

Court	Los Angeles
Case No.	19STCV20382
Nature	Rest Break violations
Status	Settled

32. Josefina Garces v. Kar Auction Services

Court	Los Angeles
Case No.	19STCV28489
Nature	Rest Break violations
Status	Settled

33. Madison Weiss v. Niznik Behavior

Court	San Diego
Case No.	37-2019-00039441-CU-OE-CTL
Nature	Meal and Rest Break violations
Status	Settled

34. Jimmy Mack v. ERM Enterprises

Court	Sacramento
Case No.	2019-00262259
Nature	Meal and Rest Break violations
Status	Settled

35. Josefina Garces v. DriverDo

Court	Los Angeles
Case No.	19STCV32773
Nature	Independent Contractor Misclassification
Status	In Litigation

36. Perseus Porras v. Tantalum Restaurant

Court	Los Angeles
Case No.	19STCV31015
Nature	Unpaid Wages + Missed Meal/Rest Breaks
Status	Settled

37. Dorcena Deutsch v. Scripps

Court	San Diego
Case No.	37-2019-00036333-CU-OE-CTL
Nature	Regular Rate Miscalculation for Nurses
Status	Settled

38. Josalyn O'Quinn v. Laugh Factory

Court	Los Angeles
Case No.	19STCV28155
Nature	Regular Rate Miscalculation, Wage Theft
Status	In Litigation

39. Nicholas Leon v. Miller Event Management

Court	San Luis Obispo
Case No.	19CV-0435
Nature	Meal/Rest Breaks, Reporting Time, 2802
Status	Settled

40. Aaris Watts v. TRL Systems

Court	Orange County
Case No.	30-2019-01102457-CU-OE-CXC
Nature	Meal/Rest Breaks, Reporting Time
Status	In Litigation

41. Faith Smith v. Island Pizza

Court	Contra Costa
Case No.	MSC19-01654
Nature	Meal/Rest Breaks, 226, 2802
Status	Settled

42. Johnathan Roa v. Otay Mesa Sales

Court	San Diego
Case No.	37-2019-00057735-CU-OE-CTL
Nature	Meal/Rest Breaks, 226
Status	In Litigation

43. Sabrina Ivon v. Sinclair Television of California

Court	Humboldt
Case No.	DR190699
Nature	Vaquero
Status	In Litigation

44. Jonathan Mitchell v. Mack Trucking

Court	San Bernardino
Case No.	CIVDS1928334
Nature	Independent Contractor Misclassification
Status	In Litigation

45. Curtis Edwards v. Resolve Group

Court	San Francisco
Case No.	CGC-19-579095
Nature	Meal & Rest Breaks + 2802
Status	In Litigation

46. Elena Kiseleva v. TotalMed Staffing, Inc

Court	Santa Clara
Case No.	19CV354635
Nature	Overtime + Meal and Rest Breaks
Status	Settled

47. Richard Jer Vang v. Bridge Property Management

Court	Alameda
Judge	Winfred Smith
Nature	Off the clock work, regular rate miscalc.
Status	Settled

48. Madison Marrero v. Stat Med

Court	Alameda
Case No.	HG19043214
Nature	Unpaid Overtime + Meal/Rest Breaks
Status	In Litigation

49. Brian Reyes v. Stowasser Buick-GMC

Court	Santa Barbara
Case No.	19CV06183
Nature	Vaquero
Status	Settled

50. Erik Foss v. Anderson Hospitality, Inc.

Court	Shasta
Case No.	195317
OPC	Wood Smith – Andrew Kleiner
Nature	Meal and Rest Breaks, Regular Rate
Status	In Litigation

51. Griselda Duran v. EmployBridge

Court	Kern
Case No.	BCV-20-101583
Nature	Regular Rate, 226
Status	In Litigation

52. Luis Rendon v. Healthcare Investments, Inc.

Court	Los Angeles
Case No.	20STCV39775
Nature	Meal and Rest Breaks
Status	In Litigation

53. Richard Melead v. TVI, Inc.

Court	Orange
Case No.	30-2020-01140887-CU-OE-CXC
Nature	Regular Rate, 226 (Magadia)
Status	In Litigation

54. David Spencer v. Asset Gas, Inc.

Court	San Diego
Case No.	37-2020-00024642-CU-OE-CTL
Nature	Meal and Rest Breaks
Status	Settled

55. Thomas Haven v. California Vocations, Inc.

Court	Butte
Case No.	20CV01514
Nature	Regular Rate + Meal and Rest Breaks
Status	In Litigation

56. Estefania Renteria v. Love's Country

Court	Kern
Case No.	BCV-20-101260
Nature	226
Status	In Litigation

57. Rachel Latin v. OneMain General Services Corp.

Court	Stanislaus
Case No.	CV-20-002498
Nature	Dart + Magadia
Status	In Litigation

58. Kalaina Dula v. 2 Kings Gaming, Inc.

Court	Merced
Case No.	#20CV-02289
Nature	Meal and Rest Breaks
Status	In Litigation

59. Jie Xu v. HT Multinational

Court	San Bernardino
Case No.	CIV-DS2015679
Nature	Exempt Misclassification
Status	In Litigation

60. Yvette Molina v. Hawaiian Airlines

Court	Los Angeles
Case No.	20STCV28079
Nature	Meal and Rest + Magadia
Status	In Litigation

61. Reinald Pillsbury v. T & T Restaurants CA

Court	Del Norte
Case No.	CVUJ-2020-1214
Nature	Meal/Rest Breaks + Regular Rate
Status	Settled

62. Luis de Jesus v. Guardian Angel Home Care

Court	San Diego
Case No.	37-2020-00021049-CU-OE-CTL
Nature	Piece-Rate
Status	In Litigation

63. Charles Sandlin v. Secure Nursing Services, Inc.

Court	Los Angeles
Case No.	20STCV25675
Nature	Regular Rate
Status	Settled

64. Gabriel Mendez v. Bondz, Inc.

Court	San Joaquin
Case No.	STK-CV-UOE-2020-0007486
Nature	Piece-Rate
Status	In Litigation

65. James Conley v. Siskiyou Forest Products

Court	Shasta
Case No.	195819
Nature	Regular Rate and Meal/Rest Breaks + 226
Status	In Litigation

66. Alex Castellanos v. Southwest Patrol

Court	San Diego
Case No.	37-2020-00024905-CU-OE-CTL
Nature	Augutus
Status	In Litigation

67. Damien Hampton v. Pegasus Investors

Court	Sacramento
Case No.	34-2020-00281394-CU-BT-GDS
Nature	Unlawful Housing
Status	In Litigation

68. Tamara Perkins v. FSEI

Court	Sacramento
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Case No.	34-2020-00287054
Nature	Regular Rate
Status	In Litigation

69. Rodney Stovall v. Javelin Logistics Company

Court	Alameda
Case No.	RG20075705
Nature	Meal / Rest Breaks
Status	In Litigation

70. Gabrielle Boyd v. Bluestone Lane Holdings, LLC

Court	San Francisco
Case No.	CGC-20-585787
Nature	Tip Pooling ; Magadia
Status	In Litigation

71. Elias Kaser v. Aviation Consultants, Inc.

Court	Orange County
Case No.	
Nature	Meal / Rest Breaks, Regular Rate
Status	Settled

72. Christopher Chacon v. Panda Motors, Inc.

Court	San Bernardino
Case No.	CIV DS2022220
Nature	Regular Rate
Status	In Litigation

73. Willie Lang v. Pathways

Court	San Diego
Case No.	37-2019-00049969
Nature	Off the Clock
Status	In Litigation

74. Norma Reyes v. Simpson Garden Grove, Inc.

Court	Orange
Case No.	30-2020-0117564-CU-OE-CJC
Nature	Meal / Rest Breaks
Status	Settled

75. Daniel Jacobs v. Rush Media Company

Court	Los Angeles
Case No.	20STCV32350
Nature	Independent Contractor Misclassification
Status	In Litigation

76. Luis Ledesma v. TVJ Sons I, Inc.

Court	Santa Barbara
Case No.	20CV03573
Nature	Vaquero
Status	In Litigation

77. Kevin Cianfarani v. Career Strategies Temporary, Inc. (MPI)

Court	Los Angeles
Case No.	
Nature	Off the clock work
Status	Settled

78. Hector Avitia v. LAZ Parking

Court	San Diego
Case No	37-2020-00030133-CU-OE-CTL
Nature	Magadia + Augustus
Status	In Litigation

79. Sukhraj Kaur v. ACES 2020, LLC

Court	Contra Costa
Case No.	C20-02482
Nature	Meal/Rest Breaks, 2802
Status	In Litigation

80. Boaventura v. Rei Do Gado

Court	Contra Costa
Case No.	37-2020-00032342-CU-OE-CTL
Nature	Meal/Rest Breaks, 2802
Status	In Litigation

81. James Rachal v. ELG Metals, Inc.

Court	Los Angeles
Case No.	20STCV45861
Nature	Meal/Rest Breaks, Regular Rate
Status	In Litigation

82. Evelyn Nwansi v. Princeton Healthcare Center, LLC

Court	Alameda
Case No.	RG20083664
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

83. Michael Ashlock v. Advantis Medical Staffing

Court	San Diego
Case No.	37-2020-00022305-CU-OE-CTL
Nature	Regular Rate
Status	Settled

84. Moe Popal v. Ameriprise Auto & Home Insurance

Court	Riverside
Case No.	RIC2000006
Nature	Exempt/Non-Exempt Misclassification
Status	Settled

85. Mark Williams v. Web to Door

Court	San Francisco
Case No.	
Nature	Meal and Rest Break + Regular Rate
Status	In Litigation

86. Jessica Barackman v. Teaz N Pleaz, Inc.

Court	El Dorado
Case No.	SC20200179
Nature	Meal/Rest Breaks, Seating
Status	In Litigation

87. Nicolas Neutall v. Urban Alchemy

Court	San Francisco
Case No.	CGC-20-588622
Nature	Meal/Rest Breaks, Unpaid Overtime
Status	In Litigation

EXHIBIT 2

Activities Export

08/08/2022

3:00 PM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/06/2022		Drafting stip to continue, filing, and serving on OC.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Natalia Michele	1.00h	\$165.00	-	\$165.00
04/06/2022		Follow up with OPC on the agreement.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.10h	\$550.00	-	\$55.00
02/14/2022		Work on motion for approval.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00h	\$550.00	-	\$550.00
02/09/2022		Drafting Stip to Continue and circulating to OC.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Natalia Michele	0.50h	\$165.00	-	\$82.50
02/02/2022		Review and revise settlement agreement.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	2.00h	\$550.00	-	\$1,100.00
01/27/2022		Emails regarding call from client. Review and revise stipulation to continue status conference.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.20h	\$550.00	-	\$110.00
01/14/2022		Attend mediation and negotiate MOU  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	7.00h	\$550.00	-	\$3,850.00
01/14/2022		Discuss w/ Attorney Zakay PLA's claims in preparation for mediation;	32401-Alavicheh Mohammad Alavicheh v.	Jackland Hom	0.30h	\$375.00	-	\$112.50

Activities Export

08/08/2022

3:00 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		emails w/ co-counsel re same ● Unbilled	Suburban Buick GMC Cadillac, LLC					
01/14/2022	🕒	Attend mediation ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	1.00h	\$375.00	-	\$375.00
01/11/2022	🕒	Review damage report for mediation and emails with co-counsel regarding the same. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
01/07/2022	🕒	More work on mediation brief (E.Zakay) ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	2.00h	\$300.00	-	\$600.00
01/07/2022	🕒	Further revise and finalize mediation brief for submission to mediator ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	1.00h	\$375.00	-	\$375.00
01/07/2022	🕒	Final review and approval of the mediation brief. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.50h	\$550.00	-	\$275.00
01/07/2022	🕒	Extract and prepare exhibits for mediation brief ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	1.50h	\$375.00	-	\$562.50
01/06/2022	🕒	Work on mediation brief. (E.Zakay) ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC	Shani Zakay	2.00h	\$300.00	-	\$600.00
					77.40h		\$0.00 0.00h	\$30,405.00 77.40h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Cadillac, LLC								
01/06/2022		Emails with OPC and staff regarding data for mediation.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.20h	\$550.00	-	\$110.00
01/05/2022		Review file and revise mediation brief  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	2.00h	\$375.00	-	\$750.00
01/04/2022		Work on mediation brief.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	2.00h	\$550.00	-	\$1,100.00
12/30/2021		Work on mediation brief (E.Zakay)  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	2.00h	\$300.00	-	\$600.00
12/30/2021		Follow up with OPC on sample for mediation.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.10h	\$550.00	-	\$55.00
12/28/2021		Draft Mediation Brief (E.Zakay)  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	4.50h	\$300.00	-	\$1,350.00
12/27/2021		More emails regarding data for mediation.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.10h	\$550.00	-	\$55.00
					77.40h		\$0.00	\$30,405.00
							0.00h	77.40h

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Date ▾	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/27/2021	 	Emails with OPC to follow up on status of data production for mediation. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.10h	\$550.00	-	\$55.00
12/03/2021	 	Emails with OPC regarding plaintiff's file and data for mediation and download discovery production. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
12/02/2021	 	Emails with OPC regarding data for mediation. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.20h	\$550.00	-	\$110.00
12/02/2021	 	Follow up on mediation data demand. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.20h	\$550.00	-	\$110.00
11/08/2021	 	drafting joint statement, filing, and serving. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00h	\$165.00	-	\$165.00
11/04/2021	 	Begin work on mediation brief (PB Law Clerk) ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	2.00h	\$200.00	-	\$400.00
11/04/2021	 	Work on mediation brief ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
					77.40h		\$0.00 0.00h	\$30,405.00 77.40h

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/29/2021	 	Review and revise stipulation to continue CMC. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
10/07/2021	 	Filing Change of Address. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.50h	\$165.00	-	\$82.50
09/23/2021	 	Review mediation confirmation letter and invoice. Instruct staff accordingly. Calendar relevant dates. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.50h	\$550.00	-	\$275.00
09/17/2021	 	Coordinate mediation. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.50h	\$550.00	-	\$275.00
08/31/2021	 	Emails with OPC regarding mediators. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.20h	\$550.00	-	\$110.00
08/30/2021	 	Emails with OPC re mediation scheduling ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	0.10h	\$350.00	-	\$35.00
08/20/2021	 	Prepare for and attend hearing on Def. MTC Arb ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	1.80h	\$350.00	-	\$630.00
					77.40h		\$0.00	\$30,405.00
							0.00h	77.40h

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/19/2021		Review Court's tentative on hearing for Def's MTC Arb ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	0.40h	\$350.00	-	\$140.00
08/19/2021		Review Def's Reply to MTC Arb; legal research on authorities cited therein ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	2.00h	\$350.00	-	\$700.00
08/12/2021		Drafting Joint Statement, getting it approved, circulating to OC, and filing. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	2.00h	\$165.00	-	\$330.00
08/12/2021		More work on the status report. Emails with OPC regarding mediation. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.20h	\$550.00	-	\$110.00
08/12/2021		Review and revise the status report. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
08/09/2021		Finalize Oppo to MTC Arb; Obj to Evid; and Proposed Order in preparation for filing ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	1.00h	\$350.00	-	\$350.00
08/09/2021		Review and revise the evidentiary objections on the MTC Arb. Review and approve opposition. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00h	\$550.00	-	\$550.00
					77.40h		\$0.00	\$30,405.00
							0.00h	77.40h

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/09/2021		Revise Oppo to Def. MTC Arb; Objections to Evidence; and Proposed Order  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	1.30h	\$350.00	-	\$455.00
08/09/2021		Draft Plaintiff's Objection to Evidence for Oppo to MTC Arb  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	1.20h	\$350.00	-	\$420.00
08/05/2021		Review and revise the opposition to the motion to compel.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00h	\$550.00	-	\$550.00
08/05/2021		Continue drafting Oppo to MTC Arb; legal research.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	7.00h	\$350.00	-	\$2,450.00
08/04/2021		Legal research for Oppo to Motion to Compel Arb  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	0.80h	\$350.00	-	\$280.00
08/04/2021		Draft Oppo to Motion to Compel Arb  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	4.00h	\$350.00	-	\$1,400.00
08/03/2021		Review Def.'s Motion to Compel Arb  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	1.50h	\$350.00	-	\$525.00
07/27/2021		Calls and emails with OPC regarding motion to compel.	32401-Alavicheh Mohammad Alavicheh v.	Shani Zakay	0.20h	\$550.00	-	\$110.00

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Suburban Buick GMC Cadillac, LLC					
07/08/2021	🕒	Meeting with staff regarding work required for Oppo to Motion to Compel Arb. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Jackland Hom	0.40h	\$350.00	-	\$140.00
07/07/2021	🕒	Call with client with update. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.20h	\$550.00	-	\$110.00
06/03/2021	🕒	Call with client regarding status. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.20h	\$550.00	-	\$110.00
05/27/2021	🕒	Review responses to discovery. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
05/18/2021	🕒	Initial review of defendant's MTC Arb. Discussion and emails with co-counsel. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.40h	\$550.00	-	\$220.00
05/11/2021	🕒	Joint ISC Statement Draft - Sent to Attorneys for review. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00h	\$150.00	-	\$150.00
05/11/2021	🕒	Review and revise joint status report. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC	Shani Zakay	0.20h	\$550.00	-	\$110.00
					77.40h		\$0.00 0.00h	\$30,405.00 77.40h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Cadillac, LLC								
04/29/2021		Call with OPC to discuss claims and possible mediation.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.50h	\$550.00	-	\$275.00
04/22/2021		Finishing up SI and E-Service it to all parties.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.80h	\$150.00	-	\$120.00
04/15/2021		Emails and calls with OPC regarding extension to respond to the complaint.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
04/13/2021		Review order setting CMC and calendar relevant dates.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
04/08/2021		Review and revise SI  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
04/08/2021		Met with attorney to go over SI. Drafted the 1st set of SI and emailed it out to Tesla Stone to review and revise. Got sent back the updates and fixed the document to get sent out.  Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00h	\$150.00	-	\$150.00
02/02/2021		Emails with staff regarding status	32401-Alavicheh	Shani	0.10h	\$550.00	-	\$55.00
					77.40h		\$0.00 0.00h	\$30,405.00 77.40h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		update for client. ● Unbilled	Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Zakay				
01/29/2021	🕒	Emails with staff regarding service. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.10h	\$550.00	-	\$55.00
01/28/2021	🕒	Review invoice from OneLegal and upload to CLIO. Update expenses in Clio. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.10h	\$550.00	-	\$55.00
01/27/2021	🕒	Review, revise and execute the civil cover sheet and summons and instruct staff on filing. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	0.30h	\$550.00	-	\$165.00
01/27/2021	🕒	Draft Summons & Civil Case Cover Sheet; Case Initiation for filing Complaint via OL T.D. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.20h	\$150.00	-	\$180.00
11/18/2020	🕒	Draft Complaint and PAGA letter and instruct staff on filing. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	4.50h	\$550.00	-	\$2,475.00
11/14/2020	🕒	Review the file and discuss with co-counsel. ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	2.00h	\$550.00	-	\$1,100.00
					77.40h		\$0.00 0.00h	\$30,405.00 77.40h

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/22/2022	\$	OneLegal - Order ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Natalia Michele	1.00	\$35.26	-	\$35.26
01/28/2022	\$	Expert Cost ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00	\$375.00	-	\$375.00
12/02/2021	\$	Mediation Fees ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00	\$2,075.00	-	\$2,075.00
11/17/2021	\$	OneLegal - Stip and Order ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00	\$35.26	-	\$35.26
11/12/2021	\$	CourtCall - SC ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00	\$94.00	-	\$94.00
11/08/2021	\$	OneLegal - Proposed Order ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00	\$12.00	-	\$12.00
10/07/2021	\$	OneLegal Fee - COA ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00	\$14.67	-	\$14.67
08/12/2021	\$	OneLegal Fee - Joint Statement ● Unbilled	32401-Alavicheh Mohammad Alavicheh v.	Shani Zakay	1.00	\$14.67	-	\$14.67

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			Suburban Buick GMC Cadillac, LLC					
08/11/2021	\$	CourtCall Fee - SC ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00	\$94.00	-	\$94.00
06/16/2021	\$	Knox Invoice - Summons, Complaint, CCCS, Alternative Dispute Filing ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00	\$109.35	-	\$109.35
05/24/2021	\$	Court Call Fee ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00	\$94.00	-	\$94.00
03/19/2021	\$	Filing Fee - POS ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00	\$14.67	-	\$14.67
01/28/2021	\$	Filing Fee - Complaint ● Unbilled	32401-Alavicheh Mohammad Alavicheh v. Suburban Buick GMC Cadillac, LLC	Shani Zakay	1.00	\$1,496.61	-	\$1,496.61
							\$0.00 0.00h	\$4,464.49 0.00h