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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

QUAID DANIELS on behalf of himself and on
behalf of all persons similarly situated,

Plaintiff,

v.

AVMC, LLC dba TOYOTA OF
LANCASTER, a California limited liability
company; and Does 1-50, Inclusive,

Defendants.

Case No: 21STCV07885

Action Filed: August 6, 2020

**DECLARATION OF JEAN-CLAUDE
LAPUYADE, ESQ. IN SUPPORT OF
PLAINTIFF'S MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Date: August 16, 2022

Time: 9:00 a.m.

Reservation ID: 645614952695

Dept.: 39

Judge: Hon. Stephen I. Goorvitch

1 I, JEAN CLAUDE LAPUYADE, declare as follows:

2 1. I am the managing partner of JCL Law Firm, APC, and co-counsel of record for Plaintiff
3 QUAID DANIELS, on behalf of himself, and on behalf of all persons similarly situated, and in his
4 representative capacity on behalf of the State of California and fellow Aggrieved Employees,
5 (“Plaintiff”) in this matter. As such, I am fully familiar with the facts, pleadings and history of the
6 matter.

7 2. I am submitting this declaration in support of Plaintiff’s Motion for Approval of PAGA
8 Settlement.

9 **I. EXHIBITS**

10 3. Attached hereto as **Exhibit “A”** is a true and correct copy of the JCL Law Firm, APC’s
11 “Transaction Summary” detailing Plaintiff’s Counsel’s actually incurred litigation expenses for this
12 matter as of July 22, 2022. As shown in detail in the attached transaction summary, Counsel has
13 incurred a total of \$8,185.87 in litigation costs prosecuting this action. I anticipate incurring an
14 additional \$150 - \$200 for the filing, service and appearance at this motion.

15 4. Attached hereto as **Exhibit “B”** is a true and correct copy of the Time and Billing Journal
16 for the attorneys and staff at the JCL Law Firm, APC. To the best of my knowledge, each entry was
17 made contemporaneously by the applicable attorney and/or staff members and in the ordinary course
18 of their usual course of business. The attached Billing Journal shows that the JCL Law Firm, APC,
19 billed a total of 131.30 hours for a total of \$55,895.00 successfully litigating this action at \$550 per
20 hour for attorney Jean-Claude Lapuyade, Esq., at \$400 per hour for attorney Eduardo Garcia, Esq., and
21 at \$150 per hour for paralegal Tesla Stone.

22 5. The JCL Law Firm’s rates are comparable to those judicially approved for other
23 plaintiff’s firms, such as Baron & Budd (rates ranging from \$775 for the requested partner to \$390-
24 \$630 for non-partners), Western Comden Casselman & Essensten (rates ranging from \$670-\$750 for
25 partners and \$300-\$500 for associates), and Blood Hurst & Rearden (\$510-\$695 for partners). See
26 Aarons v. BMW of North America, No. 11-7667-PSG, 2014 U.S. Dist. LEXIS 118442, *40-41 (C.D.
27 Cal. Apr. 29, 2014). Other Southern California courts have approved hourly rates in the requested
28

1 range. See e.g., *Kearney v. Hyundai Motor Am.*, 2013 U.S. Dist. LEXIS 91636, *24 (C.D. Cal. June
2 28, 2013) (approving hourly rates of \$650 -\$800 for senior attorneys in consumer class action);
3 *Parkinson v. Hyundai Motor America*, 796 F.Supp.2d 1160, 1172 (C.D. Cal. 2010)(approving hourly
4 rates between \$445 and \$675); *Faigman v. AT&T Mobility, LLC*, 2011 U.S. Dist. LEXIS 15825, *2
5 (N.D. Cal. Feb. 15, 2011)(Approving hourly rates of \$650 an hour for partners and \$500 for associates);
6 *Richard v. Ameri-Force Mgmt. Servs., Inc.*, No 37-2008-00096019 (San Diego Superior Court, August
7 27, 2010)(\$695 to \$750 an hour for partners and \$495 for associates); *Barrera v. Gamestop*, No. CV
8 09-1399 (C.D. Cal. Nov. 29, 2010)(\$700 for partners and \$475 for associates); *Anderson v. Nextel*
9 *Retail Stores, LLC*, No. CV 07-4480 (C.D. Cal. June 20, 2010)(\$655- \$750 for partners and \$300 –
10 515 for associates); *Luquetta v. Regents of Cal.*, CGC-05-443007 (San Francisco Sup. Ct.) (approving
11 2012 partner rates between \$550 and \$850 per hour); and *Holoway v. Best Buy Co.*, C-05-5056-PJH
12 (MEJ)(N.D. Cal.)(approving 2011 partner rates between \$825 and \$700, and associates hourly rates
13 between \$355 and \$405 an hour).

14 6. Moreover, my billing rate has been approved multiple times within the last year by
15 California Superior Court judges. (See generally *Rodriguez v. RSI Home Products, Inc.*, San
16 Bernardino Superior Court Case No. CIVDS 2023354 (July 30, 2021 – Hon. David Cohn approved
17 \$550 billing rate and appointed Jean-Claude Lapuyade, Esq. as Counsel in a \$1,450,000 wage and hour
18 class action settlement); *Nunes v. Home Depot U.S.A., Inc.*, San Joaquin Superior Court Case No. STK-
19 CV-UOE-2020-0011011 (October 20, 2021 – Hon. Roger Ross approved \$550 billing rate and
20 appointed Jean-Claude Lapuyade, Esq. as Counsel in a \$1,500,000 wage and hour class action
21 settlement); *Pillsbury v. T&T Restaurants CA, Inc.*, Del Norte Superior Court Case No. CVUJ-20-
22 1214 (December 14, 2021 – Hon. Darren McElfresh approved \$550 billing rate and appointed Jean-
23 Claude Lapuyade, Esq. as Counsel in a wage and hour class action settlement); *Elias Kaser v. Aviation*
24 *Consultants, Inc.*, Orange County Superior Court Case No. 30-2021-01191204-CU-OE-CXC
25 (September 22, 2021 – Hon. Peter J. Wilson approved \$550 billing rate in a representative California
26 Labor Code Private Attorney General Act settlement).

1 7. Further, Counsel will be performing additional work, including finalizing the orders and
2 judgment and monitoring the completion of the settlement process over the course of the next coming
3 months.

4 8. All of Counsel's out-of-pocket expenses are the types of expenses normally charged to
5 paying clients including the following: filing fees; copying; telephone; postage; factual and legal
6 research charges; mediation fees; expert costs and travel expenses, which were all incurred during, and
7 were necessary for the successful prosecution of, the litigation and, therefore, should be reimbursed.

8 9. Counsel now requests reimbursement for those incurred litigation expenses and costs as
9 provided for in the Settlement Agreement and based upon Counsel's billing records.

10 **II. JCL LAW FIRM EXPERIENCE**

11 10. Counsel in this matter has extensive class action and PAGA experience in multiple fields
12 and has represented tens-of-thousands of persons in class actions and PAGA matters. Counsel has
13 previously litigated similar wage and hour class actions involving similar meal and rest period
14 violations. Counsel has been approved as class counsel in similar wage and hour actions throughout
15 the State of California. As such, courts throughout the California have deemed Counsel experienced
16 and knowledgeable in this area of law. Counsel has participated in every aspect of the settlement
17 discussions and has concluded the settlement is fair, adequate and reasonable and in the best interests
18 of the Class.

19 11. Plaintiff and the Aggrieved Employees are represented by competent and experienced
20 counsel to pursue their claims. I established the JCL Law Firm, APC ("Firm"), in 2010. The Firm is
21 a boutique plaintiff firm representing aggrieved employees and consumers throughout California in
22 wage and hour class actions, PAGA Actions and complex multi-party product liability matters. The
23 Firm currently consists of myself, Jean-Claude Lapuyade, Esq. (Partner/Owner), Eduardo Garcia
24 (Associate), Tesla Stone (Paralegal), and Jennifer Heming (Legal Secretary).

25 12. I am qualified to represent the Plaintiff, the State of California and the Aggrieved
26 Employees. I have extensive experience with wage and hour class and representative actions litigation
27 like this matter, and employment matters in general. Additionally, I have extensive complex mass tort
28

1 litigation experience and complex construction product liability experience. I can, will and have
2 adequately represented the interests of the Plaintiff, the State of California and the Aggrieved
3 Employees throughout this action.

4 13. I have represented consumers and employees in California class actions, and complex
5 multi-party product liability actions exclusively for more than 13 years. I have been in practice as a
6 plaintiffs' civil litigation attorney since April 2007.

7 14. I have significant class counsel and collective action counsel experience. I served as class
8 and/or collective (PAGA) counsel in, among other cases, the following matters:

9 a. *Munoz v. AMTCR*, San Bernardino Superior Court Case No. CIV-DS2001914
10 (August 24, 2021) Hon. David Cohn approved a \$1.8 million dollar class and PAGA
11 settlement for, *inter alia*, inaccurate itemized wage statements. The JCL Law Firm, APC
12 acted as class counsel for the settlement class and as representative PAGA counsel the
13 State of California and the Aggrieved Employees.)

14 b. *Nunes v. Home Depot U.S.A., Inc.*, San Joaquin Superior Court Case No. STK-
15 CV-UOE-2020-0011011 (October 20, 2021 – Hon. Roger Ross approved a \$1.5 million
16 dollar class and PAGA settlement for, *inter alia*, miscalculated meal period premiums
17 and appointed Jean-Claude Lapuyade, Esq, as Class Counsel.)

18 c. *Pillsbury v. T&T Restaurants CA, Inc.*, Del Norte Superior Court Case No.
19 CVUJ-20-1214 (December 14, 2021 – Hon. Darren McElfresh approved \$550 billing
20 rate and appointed Jean-Claude Lapuyade, Esq, as Class Counsel in a wage and hour
21 class action settlement.)

22 d. *Rodriguez v. RSI Home Products, Inc.*, San Bernardino Superior Court Case No.
23 CIVDS2023354 (July 30, 2021 – Hon. David Cohn approved a \$1.45 million class and
24 PAGA settlement for, *inter alia*, failure to comply with piece-rate laws, and appointed
25 the JCL Law Firm, APC as Class Counsel)

26 e. *Elias Kaser v. Aviation Consultants, Inc.*, Orange County Superior Court Case
27 No. 30-2021-01191204-CU-OE-CXC (September 22, 2021 – Hon. Peter J. Wilson
28

1 approved \$550 billing rate in a representative California Labor Code Private Attorney
2 General Act settlement).

3 f. *Jer Vang v. Bridge Property Management*, Alameda County Superior Court,
4 Case No RG19047434 (January 8, 2021 – Hon. Winifred Smith approved a class and
5 PAGA settlement for, *inter alia*, unpaid off the clock work. The JCL Law Firm, APC
6 acted as class counsel for the settlement class and as representative PAGA counsel the
7 State of California and the Aggrieved Employees.)

8 g. *Johnson v. Volt Management Corp., Inc. et al.*, Los Angeles County Superior
9 Court, Case No. 19STCV16466 (December 11, 2020 – Hon. Amy Hogue approved a
10 PAGA Settlement negotiated on behalf of the State of California and the aggrieved
11 employees by the JCL Law Firm, APC.)

12 h. *Salazar v. Frontier Auto Sales Inc., dba Frontier Toyota*, Los Angeles Superior
13 Court, Case No. 19STCV20382 (November 24, 2020 – Hon. John P. Doyle appointed
14 the JCL Law Firm, APC as class counsel and approved a class and PAGA settlement
15 for, *inter alia*, missed meal and rest periods.)

16 i. *Villalobos v. Alterra Group, LLC et al.*, Los Angeles County Superior Court,
17 Case No. 19STCV19448 (November 11, 2020 – Hon. Richard Fruin approved a PAGA
18 Settlement for, *inter alia*, unreimbursed business expenses. The JCL Law Firm, APC
19 acted as counsel for the plaintiff, the State of California and the Aggrieved Employees.)

20 j. *Stevens et al., v. Bank of England*, San Diego County Superior Court Case No.
21 37-2019-00018662-CU-OE-CTL (October 16, 2020 – Hon. John Meyer appointed JCL
22 Law Firm as Class Counsel and granted final approval of wage and hour class action for,
23 *inter alia*, off-the-clock work.)

24 k. *Frazier v. ASA Carlton, Inc.*, San Diego Superior Court Case No. 37-2019-
25 00036147 (October 9, 2020 Hon. Kenneth Medel appointed the JCL Law Firm as Class
26 Counsel and granted final approval of wage and hour class action for off-the-clock
27 work.)

1. *Krake et al., v. Central Valley Diner, Inc.*, Placer County Superior Court Case No. SCV0041645 (September 4, 2020 – Hon. Michael Jones appointed JCL Law Firm as class counsel and granted final approval of wage and hour class action for meal period violations.)

m. *Conner v. Ascendant Marketing, LLC et al.*, San Diego Superior Court Case No. 37-2019-00026864-CU-OE-CTL (July 24, 2020 Hon. Joel Wohlfeil granted approval of PAGA Settlement for, among other things, off-the-clock work. JCL Law Firm, APC acted as lead counsel.)

n. *Guerrero v. Estancia Operations, LLC.*, San Diego Superior Court Case No. 37-2019-00028963 (August 25, 2020 – Hon. Katherine Bacal approved PAGA Settlement for, *inter alia*, missed meal and rest periods. JCL LAW Firm, APC, acted as lead counsel.)

o. *Moreno v. Dash Lube, et al.*, United States District Court, Southern District of California, Case No. 18cv1922 DMS (AHG) (December 13, 2019 – Granted class certification of Labor Code Section 226 claim and appointed JCL Law Firm, APC, as Class Counsel.)

p. *Perkins et al., v. Tahiti Enterprises, Inc., et al.*, Orange County Superior Court Case No. 30-2016-00863095 (October 22, 2019 – Hon. Peter Wilson appointed JCL Law Firm, APC, as Class Counsel and granted final approval for an unlawful housing class action settlement arising out of Civil Code Section 1940.1.)

q. *Hill v. Stemak Holdings, Ltd.*, San Diego Superior Court Case No., 37-2018-00000747 (January 28, 2020 – Hon. Kenneth Medel appointed JCL Law Firm, APC as class counsel and granted final approval of wage and hour class action for unpaid overtime.)

r. *Shachno et al., v. KT Hotels, LLC, et al.* San Diego Superior Court Case No Case No. 37-2018-00043601 (May 31, 2019 – Hon, Gregory Pollack appointed JCL Law Firm, APC, as Class Counsel and granted preliminary approval for the wage and hour

1 class action settlement involving nearly 900 current and former employees. Final
2 approval scheduled for October 4, 2019)

3 s. *Almanza v. The Express Group, Inc.*, San Bernardino Superior Court Case No.
4 CIVDS1722542 (April 19, 2019 – Hon. David Cohn appointed the JCL Law Firm, APC,
5 as Class Counsel and granted final approval for a wage and hour class action settlement
6 for *inter alia*, missed meal and rest periods and independent contractor
7 misclassification.)

8 t. *Moschetto v. Pillow Global, Inc. San Diego Superior Court*, Case No. 37-2017-
9 00024031-CU-OE-CTL (April 5, 2019 – Hon. John S. Meyer appointed JCL LAW Firm,
10 APC, as Class Counsel and granted final approval for a wage and hour wage class action
11 settlement involving misclassified house cleaners.)

12 u. *Burke v. Friendship Hotel, LLC*, San Diego County Superior Court Case No. 37-
13 2017-00022517-CU-OE-CTL (March 10, 2019 – final approval granted on for an
14 unlawful housing class action arising under Civil Code Section 1940.2)

15 v. *Terrado et al., v. Accredited Debt Relief, LLC*, San Diego County Superior Court
16 Case No. 37-2018-00014181-CU-OE-CTL (February 8, 2019 – Hon. Gregory W.
17 Pollock appointed JCL Law Firm, APC as Class Counsel and granted final approval for
18 a wage and hour class action settlement for meal and rest period violations);

19 w. *Macaspac v. San Antonio Regional Hospital*, San Bernardino Superior Court
20 Case No. CIVDS1512625, (July 27, 2018 – Hon. Thomas S. Garza appointed JCL Law
21 Firm, APC, as Class Counsel and granted final approval for a wage and hour class action
22 settlement involving claims for on duty meal and rest periods.);

23 x. *Summerlin et al. v. Maplebear, Inc. dba Instacart*, Los Angeles Superior Court
24 Case No. BC603030 (2018 - certified and settled wage and hour class action.)

25 y. *Ortega v. Prime Healthcare*, San Diego Superior Court Case No. 37-2014-
26 00011240-CU-OE-CTL (2018 – Approved PAGA only settlement for on duty meal and
27 rest periods)

1 z. *Engstrom v. Bender-Rosenthal, Inc.* San Diego Superior Court Case No. 37-
2 2016-00012373-CU-OE-CTL (2017 - Certified and settled class action for employee
3 misclassification);

4 aa. *Crawford v. Outlook Amusements, Inc.*, Los Angeles Superior Court Case No.
5 BC617160 (2017 - Certified and settled wage and hour class action.);

6 bb. *Hernandez v. Sunglass Hut Trading, LLC*, San Bernardino Superior Court Case
7 No. CIVDS1505181 (2016 - Certified and settled wage and hour class action);

8 cc. *Burns v. Shalom, LLC*, San Diego Superior Court, Case No., 37-2013-00058356-
9 CU-BT-CTL (2015 - certified and settled class action for unlawful housing practices
10 arising out of Civil Code Section 1940.1);

11 15. Since 2010, I have successfully tried two (2) cases to conclusion, each resulting in a
12 favorable verdict for the firm's clients.

13 16. Finally, I have published appellate experience in *William Blanchette et al., v. The*
14 *Superior Court of Imperial County, (GHA Enterprises)*, 8 Cal.App.5th 521.

15 17. Consequently, I was named to the prestigious Thomson Reuters, Super Lawyers, Rising
16 Star in 2015, 2016, 2017 and, again, in 2018. According to Thomson Reuters, the Super Lawyers, Rising
17 Star list recognizes the top 2.5% of eligible attorneys. (see
18 https://www.superlawyers.com/about/selection_process.html.)

19 I declare under penalty of perjury under the laws of the State of California that the foregoing is
20 true and correct. Executed this 22nd day of July 2022, at San Diego, California.

21
22 **JCL LAW FIRM, APC**

23 By: 
24 Jean-Claude Lapuyade
25 Attorneys for Plaintiff
26
27
28

EXHIBIT A

JCL Law Firm

Transaction Report

All Dates

DATE	TRANSACTION TYPE	NUM	NAME	MEMO/DESCRIPTION	ACCOUNT	SPLIT	AMOUNT	BALANCE
Daniels v. AVMC (002-179)								
12/18/2020	Expense		LWDA		Client costs deferred	Chase Card 7349	75.00	75.00
12/31/2020	Journal Entry	Dec. 2020 Postage		Copies for Dec. 2020	Client costs deferred	-Split-	0.20	75.20
12/31/2020	Journal Entry	Dec. 2020 Postage		Postage for Dec. 2020	Client costs deferred	-Split-	6.90	82.10
03/04/2021	Check	2414	Knox Attorney Services, Inc.	Invoice No. 4336157 Re: Filing Fee: Summons; Complaint; Civil Case Cover Sheet Addendum and Statement of Location	Client costs deferred	US Bank-Checking - 4270	1,666.25	1,748.35
03/31/2021	Journal Entry	Mar. 2021 Postage		Copies for Mar. 2021	Client costs deferred	-Split-	1.50	1,749.85
03/31/2021	Journal Entry	Mar. 2021 Postage		Postage for Mar. 2021	Client costs deferred	-Split-	6.96	1,756.81
04/14/2021	Check	2443	Knox Attorney Services, Inc.	Invoice No. 4337282 Re: Service On: AVMC, LLC DBA Toyota of Lancaster	Client costs deferred	US Bank-Checking - 4270	121.95	1,878.76
04/30/2021	Journal Entry	Apr. 2022 Postage		Copies for Apr. 2021	Client costs deferred	-Split-	0.20	1,878.96
04/30/2021	Journal Entry	Apr. 2022 Postage		Postage for Apr. 2021	Client costs deferred	-Split-	0.51	1,879.47
08/03/2021	Expense		Case Anywhere	Inv. 27263	Client costs deferred	Chase Card 7349	121.20	2,000.67
08/31/2021	Journal Entry	August 2021 Postage		Copies for Aug 2021	Client costs deferred	-Split-	0.30	2,000.97
10/08/2021	Expense		One Legal LLC	One Legal Order Number: 17038343 - Filing Fee Re: Notice of Change of Address or Other Contact Information	Client costs deferred	Chase Card 7349	16.68	2,017.65
10/31/2021	Journal Entry	Oct 2021 Postage		Copies for Oct 2021	Client costs deferred	-Split-	0.10	2,017.75
11/13/2021	Expense		Case Anywhere	Inv. 235726	Client costs deferred	Chase Card 7349	132.00	2,149.75
11/30/2021	Journal Entry	Nov 2021 Postage		Copies for Nov 2021	Client costs deferred	-Split-	0.30	2,150.05
12/15/2021	Check	2685	First Mediation	Inv #23855	Client costs deferred	US Bank-Checking - 4270	4,500.00	6,650.05
01/25/2022	Expense		One Legal LLC	One Legal Order Number: 17574049 - Filing Fee Re: Stipulation and Order, Proof of Service (not Summons and Complaint)	Client costs deferred	Chase Card 7349	37.27	6,687.32
01/31/2022	Journal Entry	Jan 2022 Postage		Copies for Jan 2022	Client costs deferred	-Split-	0.10	6,687.42
02/08/2022	Expense		Case Anywhere	Inv. 243898	Client costs deferred	Chase Card 7349	132.00	6,819.42
02/28/2022	Journal Entry	Feb 2022 Postage		Copies for Feb 2022	Client costs deferred	-Split-	0.20	6,819.62
03/31/2022	Journal Entry	Mar 2022 Postage		Copies for Mar 2022	Client costs deferred	-Split-	0.10	6,819.72
04/30/2022	Journal Entry	April 2022 Postage		Copies for April 2022	Client costs deferred	-Split-	4.50	6,824.22
05/02/2022	Check	2808	Berger Consulting Group	Inv. 5922	Client costs deferred	US Bank-Checking - 4270	1,300.00	8,124.22
05/05/2022	Expense		LA Court E-File	Filing Fee	Client costs deferred	Chase Card 7349	61.65	8,185.87
Total for Daniels v. AVMC (002-179)							\$8,185.87	
TOTAL							\$8,185.87	

EXHIBIT B

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
Daniels v. AVMC (002-179)							
10/19/2020	No	Jean Claude Lapuyade	Fact Investigation - Client Intake	550.00	0:54	495.00	495.00
10/21/2020	No	Jean Claude Lapuyade	Fact Investigation - Reviewed Client Documents	550.00	1:54	1,045.00	1,540.00
10/27/2020	No	Jean Claude Lapuyade	Legal Research - Non-productive time, Vaquero and Blueford Cases	550.00	2:48	1,540.00	3,080.00
10/29/2020	No	Jean Claude Lapuyade	TCW Client Re Claim Analysis and Fee Agreement	550.00	1:06	605.00	3,685.00
10/30/2020	No	Tesla Stone	Send CIP; Set up new case file; File Maintenance	150.00	1:30	225.00	3,910.00
10/30/2020	No	Jean Claude Lapuyade	Drafted Fee Agreement and Client Engagement Packet	550.00	0:48	440.00	4,350.00
11/02/2020	No	Jean Claude Lapuyade	Fact Investigation - Drafted Employee File Demand	550.00	1:00	550.00	4,900.00
11/02/2020	No	Jean Claude Lapuyade	Legal Research - Employee File Demand Statutes	550.00	1:18	715.00	5,615.00
11/04/2020	No	Tesla Stone	Draft & Send File Demand; Mail; File Maintenance	150.00	1:00	150.00	5,765.00
11/04/2020	No	Tesla Stone	Entity research; File Maintenance	150.00	0:18	45.00	5,810.00
12/08/2020	No	Tesla Stone	File Maintenance; Circulate	150.00	0:12	30.00	5,840.00
12/10/2020	No	Jean Claude Lapuyade	R&R Letter from OC Re Representation	550.00	0:30	275.00	6,115.00
12/12/2020	No	Jean Claude Lapuyade	Legal Research - 226, 2802 and Meal Period Claims	550.00	2:30	1,375.00	7,490.00
12/14/2020	No	Jean Claude Lapuyade	Fact Investigation - Reviewed Employee File Documents	550.00	2:54	1,595.00	9,085.00
12/16/2020	No	Jean Claude Lapuyade	Legal Research - PAGA Notice Requirements Statutes and Case Law	550.00	3:12	1,760.00	10,845.00
12/16/2020	No	Jean Claude Lapuyade	Drafted, Revised and Edited LWDA Claim Notice	550.00	2:30	1,375.00	12,220.00
12/18/2020	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	12,235.00
12/18/2020	No	Tesla Stone	Draft PAGA Letter; File and Mail; File Maintenance	150.00	1:30	225.00	12,460.00
12/18/2020	No	Jean Claude Lapuyade	Finalized LWDA Notice	550.00	0:42	385.00	12,845.00
12/21/2020	No	Jean Claude Lapuyade	Drafted Client Letter Re Case Status and Claims Timeline	550.00	1:24	770.00	13,615.00
01/11/2021	No	Tesla Stone	Sort PLA Docs; File Maintenance	150.00	1:30	225.00	13,840.00
01/21/2021	No	Jean Claude Lapuyade	TCW Client Re Claims Status	550.00	0:24	220.00	14,060.00
02/18/2021	No	Jean Claude Lapuyade	Drafted, Revised and Edited Complaint	550.00	3:48	2,090.00	16,150.00
02/24/2021	No	Jean Claude Lapuyade	Revised, Edited and Finalized Complaint	550.00	0:42	385.00	16,535.00

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
02/25/2021	No	Tesla Stone	File Maintenance ; Circulate	150.00	0:18	45.00	16,580.00
02/25/2021	No	Tesla Stone	Draft Complaint; File and Serve; File Maintenance	150.00	1:30	225.00	16,805.00
02/25/2021	No	Tesla Stone	File Maintenance; Circulate	150.00	0:18	45.00	16,850.00
02/26/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	16,865.00
02/26/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	16,880.00
03/04/2021	No	Tesla Stone	File Maintenance; Calendar; Circulate	150.00	0:12	30.00	16,910.00
03/10/2021	No	Tesla Stone	File Maintenance; Circulate complaint Packet for Service; mail	150.00	0:30	75.00	16,985.00
03/12/2021	No	Tesla Stone	File complaint with LWDA; File Maintenance	150.00	0:18	45.00	17,030.00
03/15/2021	No	Tesla Stone	File POs of complaint ; File Maintenance	150.00	0:30	75.00	17,105.00
03/19/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	17,120.00
04/01/2021	No	Tesla Stone	File Maintenance; Circulate	150.00	0:12	30.00	17,150.00
04/02/2021	No	Jean Claude Lapuyade	Reviewed Defendant's Notice of Appearance	550.00	0:12	110.00	17,260.00
04/30/2021	No	Jean Claude Lapuyade	Drafted, Revised and Edited FAC	550.00	1:18	715.00	17,975.00
05/04/2021	No	Tesla Stone	File FAC; Serve; File Maintenance	150.00	1:30	225.00	18,200.00
05/04/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	18,215.00
05/04/2021	No	Jean Claude Lapuyade	Finalized FAC for Filing	550.00	0:18	165.00	18,380.00
05/06/2021	No	Tesla Stone	Draft & file Joint ISC; Serve; File Maintenance	150.00	1:30	225.00	18,605.00
05/11/2021	No	Tesla Stone	File Maintenance ; Circulate	150.00	0:12	30.00	18,635.00
05/12/2021	No	Tesla Stone	FAC Submission with LWDA; File Maintenance	150.00	0:18	45.00	18,680.00
05/13/2021	No	Tesla Stone	File Maintenance; Circulate	150.00	0:06	15.00	18,695.00
05/18/2021	No	Jean Claude Lapuyade	Discovery - Drafted SI (Set 1), RFP (Set 1) and RFA (Set 1)	550.00	3:36	1,980.00	20,675.00
05/19/2021	No	Tesla Stone	Draft & Serve SI; File Maintenance	150.00	1:00	150.00	20,825.00
06/10/2021	No	Jean Claude Lapuyade	Case Management - Drafted, Revised and Edited CMS	550.00	0:24	220.00	21,045.00
06/10/2021	No	Tesla Stone	File Maintenance; Circulate	150.00	0:12	30.00	21,075.00
06/11/2021	No	Tesla Stone	Draft CMS; File and Serve; File Maintenance	150.00	1:30	225.00	21,300.00
06/15/2021	No	Jean Claude Lapuyade	Reviewed and Analyzed Defendant's Answer	550.00	1:18	715.00	22,015.00
06/15/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	22,030.00
06/16/2021	No	Jean Claude Lapuyade	Case Management - Reviewed and Analyzed Defendant's CMS	550.00	0:18	165.00	22,195.00
06/22/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	22,210.00
06/28/2021	No	Jean Claude Lapuyade	Legal Research - Motion to Compel Case Law on Class List	550.00	2:42	1,485.00	23,695.00
06/29/2021	No	Jean Claude Lapuyade	Discovery - Drafted, Revised and Edited Meet and Confer Letter Re SI (Set 1)	550.00	2:18	1,265.00	24,960.00
06/30/2021	No	Tesla Stone	File Maintenance; Circulate	150.00	0:12	30.00	24,990.00
06/30/2021	No	Tesla Stone	Draft M&C Letter; Serve; File Maintenance	150.00	1:00	150.00	25,140.00

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
07/20/2021	No	Tesla Stone	File Maintenance; Circulate	150.00	0:12	30.00	25,170.00
08/04/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	25,185.00
08/31/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	25,200.00
08/31/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	25,215.00
10/04/2021	No	Eddie Garcia	Pleading- Joint Stipulation	400.00	1:24	560.00	25,775.00
10/05/2021	No	Eddie Garcia	PLEADING- Stip to Stay, correspondence.	400.00	0:30	200.00	25,975.00
10/08/2021	No	Jean Claude Lapuyade	Drafted Change of Address	550.00	0:42	385.00	26,360.00
10/08/2021	No	Jean Claude Lapuyade	Revised and Filed Change of Address	550.00	0:30	275.00	26,635.00
10/08/2021	No	Tesla Stone	Draft COA; File and Serve; File Maintenance	150.00	1:00	150.00	26,785.00
10/08/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	26,800.00
10/19/2021	No	Eddie Garcia	Law & Motion- Motion to Compel SI No. 1	400.00	6:00	2,400.00	29,200.00
10/19/2021	No	Eddie Garcia	Legal Research - Motion to Compel SI No. 1	400.00	2:00	800.00	30,000.00
11/09/2021	No	Eddie Garcia	Pleading- Correspondence regarding stipulation to stay.	400.00	0:06	40.00	30,040.00
11/11/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	30,055.00
12/02/2021	No	Eddie Garcia	Discovery- Correspondence regarding terms of stipulation.	400.00	0:12	80.00	30,135.00
12/28/2021	No	Eddie Garcia	Follow up Correspondence regarding stipulation to stay.	400.00	0:12	80.00	30,215.00
01/24/2022	No	Jean Claude Lapuyade	Discovery - Emails and Calls to/from OC Re Stip to Stay	550.00	0:30	275.00	30,490.00
01/25/2022	No	Tesla Stone	Review Stip to Stay; File Maintenance	150.00	0:30	75.00	30,565.00
01/25/2022	No	Jean Claude Lapuyade	Discovery - Emails to/from OC Re Stip to Stay pending mediation	550.00	0:24	220.00	30,785.00
01/25/2022	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	30,800.00
02/04/2022	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	30,815.00
03/15/2022	No	Eddie Garcia	Correspondence with OC re mediation data.	400.00	0:18	120.00	30,935.00
03/25/2022	No	Tesla Stone	Sort & Save DEF docs; File Maintenance	150.00	1:30	225.00	31,160.00
03/28/2022	No	Eddie Garcia	Correspondence to/from OC re mediation data	400.00	0:18	120.00	31,280.00
03/28/2022	No	Eddie Garcia	Email Correspondence - Status	400.00	0:24	160.00	31,440.00
03/28/2022	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	31,455.00
03/31/2022	No	Eddie Garcia	Mediation Brief	400.00	4:30	1,800.00	33,255.00
03/31/2022	No	Eddie Garcia	Fact & Investigation - Prep for Mediation	400.00	2:24	960.00	34,215.00
04/04/2022	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	34,230.00
04/04/2022	No	Eddie Garcia	Phone Call with client - intake	400.00	0:36	240.00	34,470.00
04/11/2022	No	Jean Claude Lapuyade	Mediation - Emails to/from Expert Re Data Sample	550.00	0:30	275.00	34,745.00
04/12/2022	No	Eddie Garcia	Mediation Brief	400.00	3:12	1,280.00	36,025.00
04/14/2022	No	Jean Claude Lapuyade	Law and Motion - Drafted, Revised and Edited Mediation Brief	550.00	2:54	1,595.00	37,620.00
04/18/2022	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	37,635.00
04/18/2022	No	Eddie Garcia	Revisions to Mediation Brief	400.00	1:48	720.00	38,355.00

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
04/19/2022	No	Tesla Stone	Review Mediation brief; File Maintenance	150.00	0:36	90.00	38,445.00
04/20/2022	No	Jean Claude Lapuyade	Discovery - Emails to/from Expert Re Damage Analysis	550.00	0:30	275.00	38,720.00
04/25/2022	No	Eddie Garcia	Participated in all day Mediation	400.00	8:30	3,400.00	42,120.00
04/25/2022	No	Tesla Stone	Review MOU; Circulate	150.00	0:30	75.00	42,195.00
04/25/2022	No	Eddie Garcia	Emails to client w/ MOU	400.00	0:12	80.00	42,275.00
04/25/2022	No	Jean Claude Lapuyade	Mediation - Attended Mediation	550.00	8:30	4,675.00	46,950.00
04/26/2022	No	Eddie Garcia	Correspondence re Admin Bid	400.00	0:18	120.00	47,070.00
04/26/2022	No	Eddie Garcia	PAGA SAR	400.00	5:12	2,080.00	49,150.00
04/26/2022	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	49,165.00
04/26/2022	No	Eddie Garcia	Individual SAR	400.00	2:48	1,120.00	50,285.00
04/27/2022	No	Eddie Garcia	Revisions to PAGA and Individual SAR	400.00	1:12	480.00	50,765.00
05/04/2022	No	Eddie Garcia	Revisions to PAGA SAR and Individual SAR	400.00	0:30	200.00	50,965.00
05/04/2022	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	50,980.00
05/05/2022	No	Jean Claude Lapuyade	Settlement - Drafted, Revised and Edited SAR	550.00	1:30	825.00	51,805.00
05/05/2022	No	Jean Claude Lapuyade	Case Management - Drafted Stip to Continue	550.00	1:30	825.00	52,630.00
05/10/2022	No	Tesla Stone	Review Stip to Vacate; File Maintenance	150.00	0:30	75.00	52,705.00
05/13/2022	No	Eddie Garcia	Revisions to PAGA SAR	400.00	0:30	200.00	52,905.00
05/24/2022	No	Eddie Garcia	Emails to/from OC re comments to PAGA and Individual SAR	400.00	0:18	120.00	53,025.00
05/31/2022	No	Jean Claude Lapuyade	Settlement - Emails to/from OPC Re Settlement Agreement	550.00	0:36	330.00	53,355.00
05/31/2022	No	Eddie Garcia	Emails to OC re comments to SARS.	400.00	0:18	120.00	53,475.00
06/06/2022	No	Eddie Garcia	Email to OC re comments to SAR.	400.00	0:18	120.00	53,595.00
06/20/2022	No	Eddie Garcia	Emails to/from OC re review and comments to SAR.	400.00	0:12	80.00	53,675.00
06/22/2022	No	Eddie Garcia	Emails to/from OC re review and comments to PAGA SAR and Individual Agreement.	400.00	0:18	120.00	53,795.00
06/24/2022	No	Eddie Garcia	Emails to/from OC re SARS	400.00	0:18	120.00	53,915.00
06/25/2022	No	Jean Claude Lapuyade	Settlement - Emails to/from OPC RE Settlement Agreement	550.00	0:18	165.00	54,080.00
07/18/2022	No	Jean Claude Lapuyade	Lew and Motion - Reviewed and Revised Approval Motion	550.00	3:18	1,815.00	55,895.00
Total for Daniels v. AVMC (002-179)					131:18	\$55,895.00	