

MAKAREM & ASSOCIATES APLC
Ronald W. Makarem, Esq. (SB#180442)
makarem@law-rm.com
Samuel Almon, Esq. (SB#243569)
almon@law-rm.com
Daniel J. Bass, Esq. (SB#287466)
bass@law-rm.com
11601 Wilshire Boulevard, Suite 2440
Los Angeles, California 90025-1760
Telephone: (310) 312-0299;
Facsimile: (310) 312-0296

Attorneys for Plaintiffs ANDREW D. TAPPIN, DONYEISHA MISH,
DARNELL LEE, LUIS ROBLES, XOCHITL VELASCO and
VICTOR GONZALEZ.

Additional counsel listed on next page

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

ANDREW D. TAPPIN, DONYEISHA MISH,
DARNELL LEE, LUIS ROBLES, XOCHITL
VELASCO, and VICTOR GONZALEZ,
individually and on behalf of all others
similarly situated, and on behalf of the general
public as private attorney general,

Plaintiffs,

vs.

TFORCE FREIGHT, INC., a Virginia
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 34-2022-00314820-CU-OE-GDS

[Assigned for all Purposes to the Honorable
Jill H. Talley]

**DECLARATION OF KYLE
NORDREHAUG IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS AND REPRESENTATIVE
ACTION SETTLEMENT**

Date: February 14, 2025
Time: 9:00 a.m.
Dept.: 23

1 **BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP**

2 Norman B. Blumenthal (State Bar #068687)

3 Kyle R. Nordrehaug (State Bar #205975)

4 Aparajit Bhowmik (State Bar #248066)

5 Nicholas J. De Blouw (State Bar #280922)

6 Jeffrey S. Herman (State Bar #280058)

7 Sergio Julian Puche (State Bar #289437)

8 Trevor G. Moran (State Bar #330394)

9 2255 Calle Clara

10 La Jolla, CA 92037

11 Telephone: (858)551-1223

12 Facsimile: (858) 551-1232

13 Website: www.bamlawca.com

14 **JAMES HAWKINS APLC**

15 James R. Hawkins, Esq. (#192925)

16 Gregory Mauro, Esq. (#222239)

17 Michael Calvo, Esq. (#314986)

18 Jeanne Sarmiento, Esq. (#309660)

19 9880 Research Drive, Suite 200

20 Irvine, CA 92618

21 Telephone: (949) 387-7200

22 Facsimile: (949) 387-6676

23 Email: James@jameshawkinsaplc.com

24 Email: Greg@jameshawkinsaplc.com

25 Email: Michael@jameshawkinsaplc.com

26 Email: Jeanne@jameshawkinsaplc.com

27 Attorneys for Plaintiffs ANDREW D. TAPPIN, DONYEISHA MISH,
28 DARNELL LEE, LUIS ROBLES, and
XOCHITL VELASCO, and VICTOR GONZALEZ

DECLARATION OF KYLE NORDREHAUG

I, Kyle Nordrehaug, declare:

1. I am a partner of the law firm of Blumenthal Nordrehaug Bhowmik De Blouw LLP (“BNBD”), counsel for Plaintiff Victor Gonzalez. As such, I am fully familiar with the facts, pleadings and history of this matter. The following facts are within my own personal knowledge, and if called as a witness, I could testify competently to the matters stated herein.

2. This declaration is being submitted in support of the Motion for Final Approval of Class Settlement by Plaintiffs Donyeisha Mish, Darnell Lee, Luis Robles, Xochitl Velasco, Victor Gonzalez, and Andrew Tappin (“Plaintiffs”). The settlement reached between Plaintiffs, individually and on behalf of all members of the Class, on the one hand, and Defendant TForce Freight, Inc. (“TForce” or “Defendant”), on the other hand, is set forth in the Stipulation of Class and Action and PAGA Representative Action Settlement (“Settlement”).

Experience of BNBD

3. Over the course of the litigation, my firm has worked actively on this matter. The firm credentials are reflected in the BNBD Resume, a true and correct copy of which is attached hereto as Exhibit #1. Some of the major cases our firm has undertaken are also set forth therein. BNBD has represented hundreds of thousands of employees in hundreds of legal matters, including PAGA lawsuits and hundreds of employment class actions. BNBD’s practice is devoted almost entirely to the prosecution of wage and hour class action and PAGA action matters. The attorneys at BNBD have been appointed lead counsel in hundreds of contested motions for class certification including many consolidated wage and hour matters. The attorneys at my firm have extensive experience in cases involving labor code violations and overtime claims. BNBD has litigated similar overtime cases against other employers on behalf of employees, including cases against Walmart, Legoland, Sharp Healthcare, Securitas, Okta, See’s Candies, Walt Disney Resorts, El Pollo Loco, Panda Express, Universal Protection, Mattress Firm, Total Renal, Liberty Mutual, Union Bank, Apple, Coventry Health Care, Qualxserv, Union Bank,

1 Marriott, Kaiser / Permanente, Walgreens, and California State Automobile Association.
2 My firm has been approved as class counsel by state and federal courts in California in
3 contested class certification motions, including approvals in this Court. It is this level of
4 experience which enabled the firm to undertake the instant matter and to successfully
5 combat the resources of the defendants and their capable and experienced counsel. On
6 account of the concerted and dedicated effort this case demanded in order to properly
7 handle and prosecute, BNBD was precluded from taking other cases, and in fact, had to
8 turn away other potential fee generating cases.

9 4. Blumenthal Nordrehaug Bhowmik De Blouw LLP was responsible for
10 handling the briefing and argument that resulted in the landmark ruling of *Sakkab v.*
11 *Luxottica Retail N. Am., Inc.*, 803 F.3d 425 (9th Cir. 2015). There, Blumenthal Nordrehaug
12 Bhowmik De Blouw LLP overcame opposition by Littler Mendelson and amici Curiae
13 briefs submitted by Mayer Brown LLP to persuade the Ninth Circuit of the importance of
14 the substantive rights of the State of California under the California Private Attorney
15 General Act of 2004 ("PAGA"). BNBD took the lead on this case where the ruling was the
16 reaffirmation of the PAGA statute and the *Iskanian* rule. BNBD also has recently engaged
17 in noted appellate work on the subject of class actions in the California Court of Appeals
18 resulting in the opinions handed down in *Securitas Sec. Services USA, Inc. v. Superior*
19 *Court*, 234 Cal. App. 4th 1109, 184 Cal. Rptr. 3d 568 (2015) (class or representative action
20 waiver in an employment-related arbitration agreement was unenforceable); *Altman v.*
21 *Solarcity Corp.*, No. D067582, 2016 Cal. App. Unpub. LEXIS 3536 (Ct. App. May 13, 2016)
22 (same). In 2015, Blumenthal Nordrehaug Bhowmik De Blouw LLP received an award
23 from the Daily Journal for Top Appellate Reversal, and I received an award from the
24 Daily Journal as Top Labor & Employment Attorney in 2016.

25 5. District Judge Irma Gonzales in a consolidated class action representing
26 hundreds of armed forces officers held that Blumenthal Nordrehaug Bhowmik De Blouw
27 LLP was "qualified counsel with extensive experience in class action litigation." *McPhail*
28 *v. First Command Fin. Planning, Inc.*, 247 F.R.D. 598, 611 (S.D. Cal. 2007). Examples of

1 other contested actions where class certification was granted Blumenthal Nordrehaug
2 Bhowmik De Blouw LLP and was appointed lead class counsel in wage and hour class
3 actions in Federal Court include *Schulz v. Qualxserv, LLC*, 2012 U.S. Dist. LEXIS 58561
4 (S.D. Cal. 2012); *Dobrosky v. Arthur J. Gallagher Serv. Co., LLC*, No. EDCV 13-0646 JGB
5 (SPx), 2014 U.S. Dist. LEXIS 106345 (C.D. Cal. July 30, 2014); *Culley v. Lincare Inc.*, No.
6 2:15-cv-00081-MCE-CMK, 2016 U.S. Dist. LEXIS 105704 (E.D. Cal. Aug. 10, 2016); *Nelson*
7 *v. Avon Prods.*, No. 13-cv-02276-BLF, 2015 U.S. Dist. LEXIS 51104 (N.D. Cal. Apr. 17, 2015);
8 *Orozco v. Illinois Tool Works*, U.S.D.C. Case No. 14-cv-02113-MCE, 2016 U.S. Dist. LEXIS
9 158115 (E.D. Cal. February 17, 2017); *Metrow v. Liberty Mutual*, U.S.D.C. Case No. EDCV
10 16-1133 JGB (C.D. Cal. May 1, 2017). Some examples of heavily contested State Court
11 wage and hour class actions where class certification was obtained and BNBD was
12 appointed lead class counsel include *El Pollo Loco Wage and Hour Cases*, Orange County
13 Superior Court, JCCP Case No. 4957 (July 30, 2018); *Torrento v. Lucile Packard Children's*
14 *Hospital*, Santa Clara County Superior Court Case No. 2016-1-CV-291035 (July 17, 2018);
15 *Salem v. Alliance*, San Bernardino Superior Court, Case No. CIVRS1401129 (March 8,
16 2016); *Rivers v. Veolia*, Sonoma County Superior Court Case No. SCV 255350 (March 9,
17 2016); *Mathies v. Union Bank*, San Francisco Superior Court Case No. CGC-10-498077
18 (Sept. 11, 2013); *Jefferson v. Bottling Co, LLC*, Orange County Superior Court Case No. 30-
19 2009-00180102-CU-OE-CXC (Sept. 7, 2010); *Rangel v. Balboa Ambulance Co.*, 37-2008-
20 00095700-CU-BT-CTL (Fe. 11, 2010); *Tan v. CSAA*, Orange County Superior Court, Case
21 No. 30-2008-00231219 (Nov. 23, 2009).

22
23 The Settlement Is Fair, Reasonable and Adequate:

24 6. Plaintiff Gonzalez was a non-exempt employee of Defendant during the
25 relevant time period. On August 27, 2021, Plaintiff Gonzalez filed with the LWDA and
26 served on Defendant a notice under Labor Code section 2699.3, stating that Plaintiff
27 Gonzalez intended to serve as a proxy of the LWDA to recover civil penalties on behalf of
28 Aggrieved Employees for alleged Labor Code violations (the "Gonzalez PAGA Notice").

1 A true and correct copy of the Gonzalez PAGA Notice is attached hereto as Exhibit #2.
2 The PAGA Notice alleged violations of California Labor Code §§ 2201, 202, 203, 204 et
3 seq., 210, 221, 226(a), 226.7, 227.3, 246, 510, 512, 558(a)(1)(2), 1194, 1197, 1197.1, 1198, 2802,
4 California Code of Regulations, Title 8, Section 11040, Subdivision 5(A)-(B), California
5 Code of Regulations, Title 8, Section 1 1070(14) (Failure to Provide Seating), Violation of
6 the applicable Industrial Welfare Commission Wage Order(s), , and attached a copy of
7 the complaint by Plaintiff Gonzalez as an exhibit to the PAGA Notice.

8 7. On November 21, 2021, Plaintiff Victor Gonzalez filed his putative class action in
9 Riverside County Superior Court in an action entitled *Gonzalez v. TForce Freight, Inc.*, Case No.
10 CVRI2105223 The Gonzalez Class Action was subsequently removed, transferred, and
11 consolidated with the Mish Class Action in the Northern District of California under Case No.
12 3:22-cv-01177. On November 21, 2021, Plaintiff Victor Gonzalez filed his separate putative
13 representative action under PAGA in Riverside Superior Court, in an action entitled *Gonzalez v.*
14 *TForce Freight, Inc.*, Riverside County Superior Case No. CVRI2105225.

15 8. On May 17, 2022, the Parties participated in a full-day mediation with
16 Michael Young, a well-regarded mediator, experienced in mediating complex labor and
17 employment matters. The case did not settle on May 17, 2022, but the Parties continued
18 to negotiate through Mr. Young for several months until they reached an agreement in
19 principle in December 2022.

20 9. In this case, the Settlement reached in the total non-reversionary amount of
21 Eight Million Two Hundred and Fifty Thousand Dollars and Zero Cents (\$8,250,000.00)
22 as the Gross Settlement Amount is the product of substantial effort by the Parties and
23 counsel should be approved as fair, reasonable and adequate. The Settlement was the
24 result of arms-length negotiations during mediation and between experienced counsel.
25 The Settlement was only reached after extensive factual and legal investigation and
26 research, careful evaluation of the respective parties' strengths and weaknesses, and
27 diligent negotiation efforts. The Settlement amount is a negotiated compromise which
28 took into account risks related to liability, damages, and all the defenses asserted by

1 Defendant. The risk that class certification would not be granted was an extremely
2 important consideration, as the denial of class certification would mean that the class
3 would receive nothing. The fear of retaliation and blacklisting makes it unlikely that
4 absent class certification, individuals would come forward to assert their rights
5 individually. Although I am of the opinion that a class can be certified, I also believe in
6 the fairness of the settlement that is based on factoring in the uncertainty and risks to
7 Plaintiffs involved in not prevailing on one or more of the causes of action or theories
8 alleged, the possibility of non-certification and potential for appeals. Based on the
9 foregoing data and our own independent investigation and evaluation, I am of the
10 opinion that the settlement with the Defendants for the consideration and on the terms
11 set forth in the Settlement is fair, reasonable, and adequate and is in the best interest of
12 the class in light of all known facts and circumstances, including the risk of significant
13 delay, the defenses asserted by Defendant, and numerous potential appellate issues.

14 10. From the inception of the case, Class Counsel has zealously represented
15 the interests of the Class. The settlement was obtained for the benefit of the Class, as
16 opposed to the individual Plaintiff. Class Counsel have been approved as class counsel in
17 a number of prior cases, have litigated numerous other class action cases, and are
18 competent to represent the Class.

19 11. Plaintiff Gonzalez and his counsel are adequate representatives in that they
20 have no conflicts with the class and will adequately represent the class.

21
22 Current Lodestar for BNBD:

23 12. The current lodestar for BNBD is \$201,700 for 271.95 hours of work. I expect my
24 firm will incur additional lodestar in the amount of \$10,000 to manage and complete the class
25 settlement. True and correct copies of the billing statements for BNBD which detail the task and
26 time spent on this matter are attached hereto as Exhibit #2 and 3. BNBD changed billing systems
27 in June of 2022, so Exhibit #2 is the billing statement from July 2021 to June 2022, and Exhibit
28 #3 is the billing statement for June 2022 to January 21, 2025.

13. The hourly rates for staff at Blumenthal Nordrehaug Bhowmik De Blouw LLP are as follows: Partner Attorneys from \$850 to \$995, Associate Attorneys from \$450 to \$750, Paralegals from \$250 to \$275. My firm's hourly rates are based upon the Laffey Matrix with the appropriate 2% increase adjustment for Southern California. A true and correct copy of the current Laffey Matrix is attached hereto as Exhibit #4. These hourly rates have been approved by Court's throughout California, including the Courts in the Superior Court of California. In fact, on August 1, 2018, District Judge Andre Birotte Jr. explicitly found that Class Counsel's "rates generally appear reasonable and 'in line with those prevailing in the [relevant] community'—the Central District of California". Finally, the reasonableness of Class Counsel's hourly rates is further confirmed by comparing such rates with the rates of comparable counsel practicing complex and class litigation as detailed in the National Law Journal Billing Survey. See e.g. *Zest IP Holdings, LLC v. Implant Direct MFG., LLC*, 2014 U.S. Dist. LEXIS 167563 (S.D. Cal. 2014) (finding that "Mayer Brown's \$775 average billing rate for partners" and "Mayer Brown's \$543 average associate billing rate" are reasonable rates when compared within 21 other firms practicing in the Southern District of California.) This survey is useful to show that Class Counsel's rates are in line with the comparable rates of the defense counsel that opposes these types of class claims, such as Mayer Brown noted above who is defense counsel in cases currently being prosecuted by Class Counsel. In another example from several years ago, Sheppard Mullin Richter & Hampton, who is opposing counsel in many cases prosecuted by Class Counsel (one of the most frequent opposing counsel), charged rates as high as \$875 for partners and \$535 for associates. Similarly, Paul Hastings, another opposing counsel in these types of cases, in years past historically charged between \$900 and \$750 for partners and \$755 and \$335 for associates. Thus, the rates charged by my firm for comparable work are less than these examples and are therefore undoubtedly reasonable.

Incurred Expenses:

14. To date, BNBD has incurred costs in the total amount of \$2,696.76 in litigating the claims resolved by this settlement. The specific details of these costs incurred are set forth in

1 BNBD's billing statements, true and correct copies of which are attached hereto as Exhibits #2
2 and 3. BNBD changed billing systems in June of 2022, so Exhibit #2 is the billing statement from
3 July 2021 to June 2022, and Exhibit #3 is the billing statement for June 2022 to January 21, 2025.

4
5 Service Award:

6 15. The parties have agreed to a service award of no more than \$10,000.00 to each of
7 the Plaintiffs. The Enhancement Awards are proper for several reasons. First, service awards "are
8 not uncommon and can serve an important function in promoting class action settlements."
9 Second, the awards are proper considering that Plaintiffs spent a substantial amount of their own
10 time to ensure that the class claims could proceed and to ensure that class members received a
11 benefit in this case. Third, the parties - who conducted arms-length settlement negotiations - have
12 agreed that the incentive is fair and reasonable in light of: (i) Class Representative's efforts as
13 plaintiff in the Litigation and (ii) their execution of a full, general release. Fourth, notice was
14 provided to the class that the service award would be paid, and no class member has objected as
15 of the filing of this motion. The other class members, who undertook none of the risks which
16 Plaintiff did, stand to substantially benefit from the Plaintiff's willingness to come forward.
17 Attached hereto as Exhibit #5 is the Declaration of Plaintiff Gonzalez.

18 16. The reasonableness of the requested service award is also established by
19 reference to the amounts that other California courts have found to be reasonable in
20 wage and hour class action settlements: *Zamora v. Balboa Life & Casualty, LLC*, Case No.
21 BC360036, Los Angeles County Superior Court (Mar. 7, 2013)(awarding \$25,000 service
22 award); *Aguilar v. Cingular Wireless, LLC*, Case No. CV 06-8197 DDP (AJWx)(C.D. Cal.
23 Mar. 17, 2011)(awarding \$14,767 service award); *Magee v. American Residential Services,*
24 *LLC*, Case No. BC423798, Los Angeles County Superior Court (Apr. 21, 2011)(awarding
25 \$15,000 service award); *Mares v. BFS Retail & Commercial Operations, LLC*, Case No.
26 BC375967, Los Angeles County Superior Court (June 24, 2010)(awarding \$15,000 service
27 award); *Baker v. L.A. Fitness Int'l, LLC*, Case No. BC438654, L.A. County Superior Court
28 (Dec. 12, 2012)(awarding \$10,000 service awards to three named plaintiffs); *Blue v.*

1 Coldwell banker Residential Brokerage Co., Case No. BC417335, Los Angeles County
2 Superior Court (Mar. 21, 2011)(awarding \$10,000 service award); *Buckmire v. Jo-Ann*
3 *Stores, Inc.*, Case No. BC394795, Los Angeles County Superior Court (June, 11,
4 2010)(awarding \$10,000 service awards); *Coleman v. Estes Express Lines, Inc.*, Case No.
5 BC429042, Los Angeles County Superior Court (Oct. 3, 2013)(awarding \$10,000 service
6 award); *Ethridge v. Universal Health Services, Inc.*, Case No. BC391958, Los Angeles
7 County Superior Court (May 27, 2011)(awarding \$10,000 service award); *Hickson v. South*
8 *Coast Auto Ins. Marketing, Inc.*, Case No. BC390395, Los Angeles County Superior Court
9 (Mar. 27, 2012)(awarding \$10,000 service award); *Hill v. sunglass Hut Int'l, Inc.*, Case No.
10 BC422934, Los Angeles County Superior Court (July 2, 2012)(awarding \$10,000 service
11 award); *Kambamba v. Victoria's Secret Stores, LLC*, Case No. BC368528, Los Angeles
12 County Superior Court, (Aug. 19, 2011)(awarding \$10,000 service award together with
13 additional compensation for their general release); *Nevarez v. Trader Joe's Co.*, Case No.
14 BC373910, Los Angeles County Superior Court (Jan. 29, 2010)(awarding \$10,000 service
15 award); *Ordaz v. Rose Hills Mortuary, L.P.*, Case No. BC386500, Los Angeles County
16 Superior Court, (Mar. 19, 2010)(awarding \$10,000 service award); *Sheldon v. AHMC*
17 *Monterey Park Hosp. LP*, Case No. BC440282, Los Angeles County Superior Court (Feb.
18 22, 2013)(awarding \$10,000 service award); *Silva v. Catholic Mortuary Services, Inc.*, Case
19 No. BC408054, Los Angeles County Superior Court (Feb. 8, 2011)(awarding \$10,000
20 enhancement award); *Weisbarth v. Banc West Investment Services, Inc.*, Case No. BC422202,
21 Los Angeles County Superior Court (May 24, 2013)(awarding \$10,000 service award);
22 *Lazar v. Kaiser Foundation Health Plan*, Case No. 14-cv-273289, Santa Clara County
23 Superior Court (Dec. 28, 2015) (awarding \$10,000 service award); *Acheson v. Express, LLC*,
24 Case No. 109CV135335, Santa Clara County Superior Court (Sept. 13, 2011)(awarding
25 \$10,000 service award); *Bejarano v. Amerisave Mortgage Corp.*, Case No. EDCV 08-00599
26 SGL (Opx)(C.D. Cal. June 22, 2010)(awarding \$10,000 service award); *Carbajal v. Sally*
27 *Beauty Supply LLC*, Case No. CIVVS 1004307, San Bernardino County Superior Court
28 (Aug. 6, 2012)(awarding \$10,000 service award); *Contreras v. Serco Inc.*, Case No. 10-cv-

1 04526-CAS-JEMx (C.D. Cal. Sep. 10, 2012)(awarding \$10,000 service award); *Guerro v.*
2 *R.R. Donnelley & Sons Co.*, Case No. RIC 10005196, Riverside County Superior Court
3 (July 16, 2013)(awarding \$10,000 service award); *Kisliuk v. ADT Security Services Inc.*,
4 Case No. CV08-03241 DSF (RZx)(C.D. Cal. Jan. 10, 2011)(awarding \$10,000 service
5 award); *Morales v. BCBG Maxazria Int'l Holdings, Inc.*, Case No. JCCP 4582, Orange
6 County Superior Court (Jan. 24, 2013)(awarding \$10,000 service award); *Barrett v. Doyon*
7 *Security Services, LLC*, Case No. BS900199, BS900517, San Bernardino County Superior
8 Court (Apr. 23, 2010)(awarding \$10,000 service award); *Zirpolo v. UAG Stevens Creek II*,
9 Santa Clara Superior Court Case no. 17CV313457 (July 10, 2018) (awarding \$10,000
10 service award); *Taylor v. TIC - The Industrial Company*, U.S.D.C. Central District of
11 California Case No. EDCV 16-186-VAP (Aug. 1, 2018) (awarding \$10,000 service award).

12
13 I declare under the penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct.

15 Executed this 21st day of January, 2025, at San Diego, California.

16
17 
18 Kyle Nordrehaug

Blumenthal Nordrehaug Bhowmik De Blouw LLP

2255 Calle Clara, La Jolla, California 92037

Tel: (858) 551-1223

Fax: (858) 551-1232

FIRM RESUME

Areas of Practice: Employee, Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation, Business Litigation.

ATTORNEY BIOGRAPHIES

Norman B. Blumenthal

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Action, Civil Litigation, Wage and Hour Class Actions, Transactional Law

Admitted: 1973, Illinois; 1976, California

Biography: Law Clerk to Justice Thomas J. Moran, Illinois Supreme Court, 1973-1975, while on Illinois Court of Appeals. Instructor, Oil and Gas Law: California Western School of Law, 1981; University of San Diego School of Law, 1983. Sole Practitioner 1976-1987. Partner, Blumenthal & Ostroff, 1988-1995. Partner, Blumenthal, Ostroff & Markham, 1995-2001. Partner, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2018. Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP, 2018 - present.

Member: San Diego County, Illinois State and American Bar Associations; State Bar of California.

Educated: University of Wisconsin (B.A., 1970); Loyola University of Chicago (J.D., 1973);

Summer Intern (1971) with Harvard Voluntary Defenders

Kyle R. Nordrehaug

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation

Admitted: 1999, California

Biography: Associate, Blumenthal, Ostroff & Markham, 1999-2001. Associate, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Member: State Bar of California, Ninth Circuit Court of Appeals, Third Circuit Court of Appeals

Educated: University of California at Berkeley (B.A., 1994); University of San Diego School of Law (J.D. 1999)

Awards: Top Labor & Employment Attorney 2016; Top Appellate Reversal - Daily Journal 2015; Super Lawyer 2015-2018

Aparajit Bhowmik

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2006, California

Educated: University of California at San Diego (B.A., 2002); University of San Diego School of Law (J.D. 2006)

Biography: Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Awards: Rising Star 2015

Nicholas J. De Blouw

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2011, California

Educated: Wayne State University (B.A. 2008); California Western School of Law (J.D. 2011)

Piya Mukherjee

Associate Attorney

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2010, California

Educated: University of California, San Diego (B.S. 2006); University of Southern California, Gould School of Law (J.D. 2010)

Victoria Rivapalacio

Associate Attorney

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2011, California

Educated: University of California at San Diego (B.A., 2003); George Washington University Law School (J.D. 2010)

Ricardo Ehmann

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2018, California; 2004, Nevada

Educated: University of California, San Diego (B.A. 1998); Loyola Law School (J.D. 2001)

Jeffrey S. Herman

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2011, California; 2016 Arizona

Educated: University of Michigan (B.A. 2008); California Western School of Law (J.D. 2011)

Charlotte James

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

Educated: San Diego State University; California Western School of Law

Christine Levu

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2012, California

Educated: University of California, Irvine; California Western School of Law

Andrew Ronan

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

Educated: Arizona State University; University of San Diego School of Law

Scott Blumenthal

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, New Mexico

Educated: University of Southern California; California Western School of Law

Sergio Julian Puche

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2013, California

Educated: University of California, Irvine; California Western School of Law

Trevor Moran

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, California

Educated: University of Rhode Island; California Western School of Law

Adolfo Sanchez Contreras

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2024, California; 2014, Mexico

Educated: The Juarez University

REPORTED CASES

Sakkab v. Luxottica Retail N. Am., Inc., 803 F.3d 425 (9th Cir. 2015) (The panel reversed the district court's order granting Luxottica Retail North America, Inc.'s motion to compel arbitration of claims and dismissing plaintiff's first amended complaint, in a putative class action raising class employment-related claims and a non-class representative claim for civil penalties under the Private Attorney General Act.);

Securitas Security Services USA, Inc. v. Superior Court, 234 Cal. App. 4th 1109 (Cal. Feb. 27, 2015) (Court of Appeal concluded the trial court correctly ruled that *Iskanian* rendered the PAGA waiver within the parties' dispute resolution agreement unenforceable. However, the Court of Appeal then ruled the trial court erred by failing to invalidate the non-severable class action waiver from the agreement and remanded the entire complaint, including class action and PAGA claims, be litigated in the Superior Court);

Sussex v. United States Dist. Court for the Dist. of Nev., 781 F.3d 1065 (9th Cir. 2015) (The panel determined that the district court clearly erred in holding that its decision to intervene mid-arbitration was justified under *Aerojet-General*. Specifically, the panel held that the district court erred in predicting that an award issued by the arbitrator would likely be vacated because of his "evident partiality" under 9 U.S.C. § 10(a)(2).);

Provost v. YourMechanic, Inc., 2020 Cal. App. Lexis 955 (Oct. 15, 2020) (Court of Appeals affirmed denial of arbitration of PAGA claim, and held in a case of first impression, that there was no additional standing rules for PAGA claim brought by independent contractor);

In re Tobacco Cases II, 41 Cal. 4th 1257 (2007); Washington Mutual Bank v. Superior Court, 24 Cal. 4th 906 (2001); Rocker v. KPMG LLP, 148 P.3d 703; 122 Nev. 1185 (2006); PCO, Inc. v. Christensen, Miller, Fink, Jacobs, Glaser, Weil & Shapiro, LLP, 150 Cal. App. 4th 384 (2007); Hall v. County of Los Angeles, 148 Cal. App. 4th 318 (2007); Coshov v. City of Escondido, 132 Cal. App. 4th 687 (2005); Daniels v. Philip Morris, 18 F.Supp 2d 1110 (S.D. Cal.1998); Gibson v. World Savings & Loan Asso., 103 Cal. App. 4th 1291 (2003); Jordan v. Department of Motor Vehicles,

75 Cal. App. 4th 445 (1999); Jordan v. Department of Motor Vehicles, 100 Cal.App. 4th 431 (2002); Norwest Mortgage, Inc. v. Superior Court, 72 Cal.App.4th 214 (1999); Hildago v. Diversified Transp. Sya, 1998 U.S. App. LEXIS 3207 (9th Cir. 1998); Kensington Capital Mgal. v. Oakley, Inc., 1999 U.S. Dist LEXIS 385; Fed.Sec.L.Rep. (CCH) P90, 411 (1999 C.D. Cal.); Lister v. Oakley, Inc., 1999 U.S. Dist. LEXIS 384; Fed. Sec. L. Rep. (CCH) P90,409 (C.D. Cal. 1999); Olszewski v. Scripps Health, 30 Cal. 4th 798 (2003); Steroid Hormone Product Cases, 181 Cal. App. 4th 145 (2010); Owen v. Macy's, Inc., 175 Cal. App. 4th 462 (2009); Taiheiyo Cement Corp. v. Superior Court, 117 Cal. App. 4th 380 (2004); Taiheiyo Cement Corp. v. Superior Court, 105 Cal.App. 4th 398 (2003); McMeans v. Scripps Health, Inc., 100 Cal. App. 4th 507 (2002); Ramos v. Countrywide Home Loans, 82 Cal.App. 4th 615 (2000); Tevssier v. City of San Diego, 81 Cal.App. 4th 685 (2000); Washington Mutual Bank v. Superior Court, 70 Cal. App. 4th 299 (1999); Silvas v. E*Trade Mortg. Corp., 514 F.3d 1001 (9th Cir. 2008); Silvas v. E*Trade Mortg. Corp., 421 F. Supp. 2d 1315 (S.D. Cal. 2006); McPhail v. First Command Fin. Planning, Inc., 2009 U.S. Dist. LEXIS 26544 (S.D. Cal. 2009); McPhail v. First Command Fin. Planning, Inc., 251 F.R.D. 514 (S.D. Cal. 2008); McPhail v. First Command Fin. Planning, Inc., 247 F.R.D. 598 (S.D. Cal. 2007); Barcia v. Contain-A-Way, Inc., 2009 U.S. Dist. LEXIS 17118 (S.D. Cal. 2009); Barcia v. Contain-A-Way, Inc., 2008 U.S. Dist. LEXIS 27365 (S.D. Cal. 2008); Wise v. Cubic Def. Applications, Inc., 2009 U.S. Dist. LEXIS 11225 (S.D. Cal. 2009); Gabisan v. Pelican Prods., 2009 U.S. Dist. LEXIS 1391 (S.D. Cal. 2009); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin. Nat'l Marine Fisheries Serv., 630 F. Supp. 2d 1222 (S.D. Cal. 2009); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin. Nat'l Marine Fisheries Serv., 2008 U.S. Dist. LEXIS 102380 (S.D. Cal. 2008); Louie v. Kaiser Found. Health Plan, Inc., 2008 U.S. Dist. LEXIS 78314 (S.D. Cal. 2008); Weltman v. Ortho Mattress, Inc., 2010 U.S. Dist. LEXIS 20521 (S.D. Cal. 2010); Weltman v. Ortho Mattress, Inc., 2008 U.S. Dist. LEXIS 60344 (S.D. Cal. 2008); Curry v. CTB McGraw-Hill, LLC, 2006 U.S. Dist. LEXIS 5920; 97 A.F.T.R.2d (RIA) 1888; 37 Employee Benefits Cas. (BNA) 2390 (N.D. Cal. 2006); Reynov v. ADP Claims Servs. Group, 2006 U.S. Dist. LEXIS 94332 (N.D. Cal. 2006); Kennedy v. Natural Balance Pet Foods, Inc., 2010 U.S. App. LEXIS 248 (9th Cir. 2010); Kennedy v. Natural Balance Pet Foods, Inc., 2008 U.S. Dist. LEXIS 38889 (S.D. Cal. 2008); Kennedy v. Natural Balance Pet Foods, Inc., 2007 U.S. Dist. LEXIS 57766 (S.D. Cal. 2007); Sussex v. Turnberry/MGM Grand Towers, LLC, 2009 U.S. Dist. LEXIS 29503 (D. Nev. 2009); Picus v. Wal-Mart Stores, Inc., 256 F.R.D. 651 (D. Nev. 2009); Tull v. Stewart Title of Cal., Inc., 2009 U.S. Dist. LEXIS 14171 (S.D. Cal. 2009); Keshishzadeh v. Gallagher, 2010 U.S. Dist. LEXIS 46805 (S.D. Cal. 2010); Keshishzadeh v. Arthur J. Gallagher Serv. Co., 2010 U.S. Dist. Lexis 116380 (S.D. Cal. 2010); In re Pet Food Prods. Liab. Litig., MDL Docket No. 1850 (All Cases), 2008 U.S. Dist. LEXIS 94603 (D.N.J. 2008); In re Pet Food Prods. Liab. Litig., 629 F.3d 333 (3rd Cir. 2010); Puentes v. Wells Fargo Home Mortgage, Inc., 160 Cal. App. 4th 638 (2008); Rezec v. Sony Pictures Entertainment, Inc., 116 Cal. App. 4th 135 (2004); Badillo v. Am. Tobacco Co., 202 F.R.D. 261 (D. Nev. 2001); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin., 2010 U.S. App. Lexis 23025 (9th Cir. 2010); Dirienzo v. Dunbar Armored, Inc., 2011 U.S. Dist. Lexis 36650 (S.D. Cal. 2011); Rix v. Lockheed Martin Corp., 2011 U.S. Dist Lexis 25422 (S.D. Cal. 2011); Weitzke v. Costar Realty Info., Inc., 2011 U.S. Dist Lexis 20605 (S.D. Cal. 2011); Goodman v. Platinum Condo. Dev., LLC, 2011 U.S. Dist. LEXIS 36044 (D. Nev. 2011); Sussex v. Turnberry/MGM Grand Towers, LLC, 2011 U.S. Dist. LEXIS 14502 (D. Nev. 2011); Smith v. Kaiser Foundation Hospitals, Inc., 2010 U.S. Dist. Lexis 117869 (S.D. Cal. 2010); Dobrosky v. Arthur J. Gallagher Serv. Co., LLC, No. EDCV 13-0646 JGB (SPx), 2014 U.S. Dist. LEXIS 106345 (C.D. Cal. July 30, 2014); Metrow v. Liberty Mut. Managed Care LLC - Class Certification Granted, Metrow v. Liberty Mut. Managed Care LLC, No. EDCV 16-1133 JGB (KKx), 2017 U.S. Dist. LEXIS 73656 (C.D. Cal. May 1, 2017); Nelson v. Avon Products, Inc., Class Certification Granted, U.S. District Court for The Northern District of California, Case No. 13-cv-02276-BLF, 2015 U.S. Dist. LEXIS 51104 (N.D. Cal. Apr. 17, 2015); Orozco v. Illinois Tool Works Inc., Class Certification Granted, 2017 U.S. Dist. LEXIS 23179 (E.D. Cal. Feb. 16, 2017); Rieve v. Coventry Health Care, Summary Judgment *Sua*

Sponte Granted for Plaintiff, Rieve v. Coventry Health Care, Inc., 870 F. Supp. 2d 856 (C.D. Cal. 2012)

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No. 37-2018-00047639-CU-OE-CTL; Erickson v. Erickson – Contra Costa County Superior Court, Case No. MSC18-00307; Martin v. Menzies Aviation (USA) Inc. – San Francisco County Superior Court, Case No. CGC-18-566072; Mortimer v. Healthsouth Bakersfield Rehabilitation Hospital, LLC – Kern County Superior Court, Case No. BCV-18-102761; Alcaraz v. Red Lion Hotels Corporation – San Francisco County Superior Court, Case No. CGC-18-570310; Calhoun v. Total Transportation and Distribution, Inc. – San Diego County Superior Court, Case No. 37-2018-00058681-CU-OE-CTL; Rataul v. Overton Security Services, Inc. – Alameda County Superior Court, Case No. RG18891882; Beltran v. Compass Bank – San Diego County Superior Court, Case No. 37-2019-00024475-CU-OE-CTL; Kirshner v. Touchstone Golf, LLC – San Diego County Superior Court, Case No. 37-2018-00028865-CU-OE-CTL; Pizarro v. The Home Depot, Inc. – U.S. District Court for the Northern District of Georgia-Atlanta Division; Hatanaka v. Restore Rehabilitation, LLC – San Diego County Superior Court, Case No. 37-2018-00034780-CU-OE-CTL; Faria v. Carriage Funeral Holdings, Inc. – Contra Costa County Superior Court, Case No. MSC18-00606; Ontiveros v. Baker Concrete Construction, Inc. – Santa Clara County Superior Court, Case No. 18CV328679; Morales v. Redlands Automotive Services, Inc. – San Bernardino County Superior Court, Case No. CIVDS1807525; Ramirez v. Carefusion Resources, LLC – U.S. District Court, Southern District of California; Amster v. Starbucks Corporation – San Bernardino Superior Court, Case No. CIVDS1922016; Kutzman v. Derrel's Mini Storage, Inc. – U.S. District, Eastern District of California, Case No. 1:18-cv-00755-AWI-JLT; Marks v. Universal Propulsion Company, Inc. – Solano County Superior Court, Case No. FCS051608; Martinez v. Geil Enterprises, Inc. – Fresno County Superior Court, Case No. 17CECG01480; Teniente v. Cirrus Asset Management, Inc. – Los Angeles County Superior Court, Case No. 20STCV16302; Blackshear v. California Fine Wine & Spirits LLC – Sacramento County Superior Court, Case No. 34-2018-00245842; Warnick v. Golden Gate America West LLC – Los Angeles County Superior Court, Case No. BC714176; Bennett v. Dnata Aviation USA, Inc. – San Francisco County Superior Court, Case No. CGC-18-566911; George v. PF Stockton Fitness LLC – Sacramento County Superior Court, Case No. 34-2019-00261113-CU-OE-GDS; Oshana v. Farmers and Merchants Bank of Central California – Stanislaus County Superior Court, Case No. CV-19-003427; Vasquez v. Packaging Corporation of America – U.S. District Court, California Central District, Case No. 2:19-cv-01935-PSG-PLA; Palomino v. Zara USA Inc. – Orange County Superior Court, Case No. 30-2018-00992682-CU-OE-CXC; Simmons v. Joe & The Juice LA, LLC – San Francisco County Superior Court; Pacia v. CIM Group, L.P. – Los Angeles County Superior Court, Case No. BC709666; Flores v. Plastic Express – Los Angeles County Superior Court, Case No. BC71971; Madera v. William Warren Properties, Inc. – Orange County Superior Court, Case No. 30-2019-01055704-CU-OE-CXC; Hernandez v. Quality Custom Distribution – Orange County Superior Court, Case No. 30-2018-01010611-CU-OE-CXC; Arango v. Schlumberger Technology Corporation – Orange County Superior Court, Case No. 30-2019-01056839-CU-OE-CXC; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Ramirez v. J E H Enterprises, Inc. – San Francisco County Superior Court, Case No. CGC-19-574691; Sullen v. First Service Residential California, LLC – San Francisco County Superior Court, Case No. CGC-19-575131; Valentino v. East Bay Tire Co. – Solano County Superior Court, Case No. FCS053067; Murphy v. Rockler Retail Group, Inc. – Sacramento Superior Court, Case No. 34-2019-00251220; Shahbazian v. Onewest Bank – Los Angeles County Superior Court, Case No. 19STCV23722; Bruemmer v. Tempur Retail Stores LLC – Marin County Superior Court, Case No. CIV1803646; Antonios v. Interface Rehab, Inc. – Orange County Superior, Case No. 30-2019-01067547-CU-OE-CXC; Tavallodi v. DC Auto, Inc. – San Bernardino, Case No. CIVDS1833598; Miranda v. The Lloyd Pest Control Co. – San Diego County Superior Court, Case No. 37-2018-00052510-CU-OE-CTL; Soenardi v. Magnussen Imports, Inc. – Santa Clara County Superior Court, Case No. 18CV340003; Thai v. Team Industrial Services, Inc. – Los Angeles County Superior Court, Case No. 19STCV21953; Castillo v. A.J. Kirkwood & Associates, Inc. – Los Angeles County Superior Court, Case No. 19STCV04435; Moss v. Jabil Inc. – Alameda County Superior Court, Case No. HG20050536; Billosillo, Jr. v. Crown Energy Services, Inc. – San Diego County Superior Court,

Case No. 37-2018-00058254-CU-OE-CTL; Tarkington v. Freetime, Inc. – San Diego County Superior Court, Case No. 37-2019-00011473-CU-OE-CTL; McIntyre v. J.J.R. Enterprises, Inc. – Sacramento County Superior Court, Case No. 34-2019-00251220; Bucur v. Pharmaca Integrative Pharmacy, Inc. – San Diego County Superior Court, Case No. 37-2019-00009409-CU-OE-CTL; Batin v. McGee Air Services, Inc. – Santa Clara County Superior Court, Case No. 19CV347733; Terry v. McGee Air Services, Inc. – King County Superior Court of Washington, Case No. 19-2-3321-5 KNT; Weiss v. Niznik Behavioral Health Resources, Inc. – San Diego County Superior Court, Case No. 37-2019-00039441-CU-OE-CTL; Cavada v. Inter-Continental Hotels Group, Inc. – U.S. District Court, Southern District of California, Case No. 3:19-cv-01675-GPC-AHG; Lešević v. Spectraforce Technologies, Inc. – U.S. District Court, Northern District of California, Case No. 5:19-cv-03126-LHK; Mutchler v. Circle K Stores, Inc. – San Diego County Superior Court, Case No. 37-2020-00016331-CU-OE-CTL, Azima v. CSI Medical Group, – Santa Clara County Superior Court, Case No. 19CV345450; Porrás v. Baypointe Enterprises, LLC – Los Angeles County Superior Court, Case No. 19STCV31015; Mitchell v. Mack Trucking, Inc. – San Bernardino County Superior Court, Case No. CIVDS1928334; Watts v. T.R.L. Systems, Incorporated – Orange County Superior Court, Case No. 30-2019-01102457-CU-OE-CXC; Price v. DMSD Restaurants Inc. – San Diego County Superior Court, Case No. 37-2019-00024062-CU-OE-CTL; Jacobs v. Nortek Security & Control LLC – San Diego County Superior Court, Case No. 37-2019-0019735-CU-OE-CTL; Gonzalez v. Hub International Midwest – San Bernardino County Superior Court, Case No. CIVDS1900463; Cisneros v. Bluepearl California, Inc. – San Mateo Superior Court, Case No. 19-CIV-05707; Garcia v. Gallagher Basset Services – San Bernardino Superior Court, Case No. CIVDS2004140; Callow v. Adventist Health System/West – Placer County Superior Court, Case No. SCV0043607; Dominguez v. Kimco Facility Services, LLC – Los Angeles County Superior Court, Case No. 19STCV37592; Searles v. Robert Heath Trucking, Inc. – Los Angeles County Superior Court, Case No. 19STCY30808; Rangel v. Pioneer Hi-Bred international, Inc. – Yolo County Superior Court, Case No. CV-19-1797; Ivon v. Sinclair Television of California, Humboldt County Superior Court, Case No. DR190699; Williams v. Henkels & McCoy, Inc. – San Bernardino County Superior Court, Case No. CIVDS2003888; Cano v. Larry Green Chrysler Jeep Dodge, Inc. – Riverside County Superior Court, Case No. BLC1900184; Lopez v. Cepheid – Santa Clara County Superior Court, Case No. 19CV358827; Hernandez v. Quick Dispense, Inc. – Los Angeles County Superior Court, Case No. 19STCV29405; Lopez v. Lacoste USA, Inc. – San Bernardino County Superior Court, Case No. CIVDS1914626; Duhe v. Hospital Couriers Nevada, LLC – Contra Costa County Superior Court, Case No. MSC19-01377; Law v. Sequoia Equities, Incorporated – Contra Costa Superior Court, Case No. C19-01925; Dvorak v. Rockwell Collins, Inc. – San Diego County Superior Court, Case No. 37-2019-00064397-CU-OE-CTL; Noguera v. Metal Container Corporation – Riverside County Superior Court, Case No. RIC2003235; Leon v. Miller Event Management, Inc. – San Luis Obispo Superior Court, Case No. 19CV-0435; Leon v. Miller Event Management, Inc. – San Luis Obispo County Superior Court, Case No. 19CV-0435, Camacho-Bias v. Serve U Brands Inc. – Butte County Superior Court, Case No. 20CV00603; La Pietra v. Entertainment Partners Services, LLC – Los Angeles County Superior Court, Case No. 19STCV39529; Celis v. Theatre Box - San Diego, LLC – San Diego County Superior Court, Case No. ____; Ignacio v. Laboratory Corporation of America – U.S. District Court, California Central District, Case No. 2:19-cv-06079-AB-RAO; Kovnas v. Cahill Contractors LLC – Alameda County Superior Court, Case No. RG19037852; Hersh v. Mrs. Gooch's Natural Food – Los Angeles County Superior Court, Case No. 19STCV10444; Miller v. The Permanente Medical Group – Alameda County Superior Court, Case No. RG19045904; Vasquez v. Autoalert, LLC – Orange County Superior Court, Case No. 30-2019-01114549-CU-OE-CXC; Cavanaugh v. Morton Golf, LLC – Sacramento County Superior Court, Case No. 34-2019-00270176; Coley v. Monroe Operations, LLC – Alameda County Superior Court, Case No. RG20063188; Ramirez v. Sierra Aluminum Company – U.S. District Court, California Central District Court, Case No. 5:20-cv-00417-JGB-KK; Marrero v. Stat Med, P.C. – Alameda County Superior Court, Case No. HG19043214; Enriquez v. Solari Enterprises, Inc. – Los Angeles County Superior Court, Case No. 20STCV11129; Craig v.

Hometown Heart – San Francisco County Superior Court, Case No. CGC-20-582454; Lopez v. Hy0Lang Electric California, Inc. – San Diego County Superior Court, Case No. 37-2020-00012543-CU-OE-CTL; Heuklom v. Clara Medical Group, P.C. – San Francisco County Superior Court, Case No. CGC-20-585918; Dominguez v. Lifesafer of Northern California – Monterey County Superior Court, Case No. 20CV002586; Kiseleva v. Totalmed Staffing Inc. – U.S. District Court, California Northern District, Case No. 5:19-cv-06480; Vires v. Sweetgreen, Inc. – Santa Clara County Superior Court, Case No. 20CV365918; Kim v. Wireless Vision, LLC – San Bernardino County Superior Court, Case No. CIVDS2000074; Senoren v. Air Canada Corporation – Los Angeles County Superior Court, Case No. 20STCV13942; Clark v. Quest Diagnostics Incorporated – San Bernardino County Superior Court, Case No. CIVDS2018707; Green v. Shipt, Inc. – Los Angeles County Superior Court, Case No. 20STCV01001; Respass v. The Scion Group LLC – Sacramento County Superior County, Case No. 34-2020-00285265; Jackson v. Decathlon USA LLC – Alameda County Superior Court, Case No. RG2003024; Avacena v. FTG Aerospace Inc. – Los Angeles County Superior Court, Case No. 20STCV28767; Perez v. Butler America, LLC – Los Angeles County Superior Court, Case No. 20STCV20218; Christensen v. Carter’s Retail, Inc. – Orange County Superior Court, Case No. 30-2020-01138792-CU-OE-CXC; Astudillo v. Torrance Health Association, Inc. – Los Angeles County Superior Court, Case No. 20STCV18424; Hansen v. Holiday AI Management Sub LLC – Contra Costa County Superior Court, Case No. CIVMSC20-00779; Almahdi v. Vitamin Shoppe Industries Inc – Santa Clara County Superior Court, Case No. 20CV365150; Krisinda v. Loyal Source Government Services LLC – U.S. District Court, California Southern District, Case No. 3:20-cv-879-LAB-NLS; Ettedgui v. WB Studio Enterprises Inc – U.S. District Court, California Central District, Case No. 2:20-CV-08053-MCS (MAAx); Fernandez v. Nuvision Federal Credit Union – Orange County Superior Court, Case No. 30-2020-01161691-CU-OE-CJC; Aviles v. UPS Supply Chain Solutions, Inc. – Riverside County Superior Court, Case No. RIC2000727; Alcocer v. DSV Solutions, LLC – San Bernardino Superior Court, Case No. CIVDS2010345; Wilson v. Wholesome Harvest Baking, LLC – U.S. District Court, California Northern District, Case No. 4:20-cv-05186-YGR; Gregory v. Verio Healthcare, Inc. – Los Angeles County Superior Court, Case No. 20STCV37254; Rose v. Impact Group, LLC – Orange County Superior Court, Case No. 30-2020-01141107-CU-OE-CXC; Monasterio v. Citibank, N.A. – San Mateo County Superior Court, Case No. 20-CIV-03650; Martinez-Lopez v. Medamerica, Inc. – San Diego County Superior Court, Case No. 37-2020-00034393-CU-OE-CTL; Cox v. PRB Management, LLC – Solano County Superior Court, Case No. FCS055514; Nash v. K. Hovnanian Companies, LLC – Riverside County Superior Court, Case No. RIC2003319; Kyler v. Harbor Freight Tools USA, Inc. – San Diego County Superior Court, Case No. 37-2020-00015828-CU-OE-CTL; Roberts v. Solantic Corporation – Los Angeles County Superior Court, Case No. 20STCV41117; Price v. Mistras Group, Inc. – Los Angeles County Superior Court, Case No. 20STCV22485; Macias v. ABM Electrical & Lighting Solutions, Inc. – San Diego County Superior Court, Case No. 37-2020-00024997-CU-OE-CTL; Basu-Kesselman v. Garuda Labs, Inc. – San Francisco County Superior Court, Case No. CGC-20-585229; Armstrong v. Prometric LLC – Los Angeles County Superior Court, Case No. 20STCV29967; Ashlock v. Advantis Medical Staffing, LLC – San Diego County Superior Court, Case No. 37-2020-00022305-CU-OE-CTL; Wilson v. WXI Global Solutions, LLC – Los Angeles County Superior Court, Case No. 20STCV25007; Gandhale v. Select Rehabilitation, LLC – Monterey County Superior Court, Case No. 20CV002240; Starvoice v. G4S Secure Solutions (USA) Inc. – San Diego County Superior Court, Case No. 37-2020-00029421-CU-OE-CTL; Mbise v. Axlehire, Inc. – Alameda County Superior Court, Case No. RG20067350; Points v. C&J Services, Inc. – Kern County Superior Court, Case No. BCV-20-102483; Marshall v. PHI Air Medical, LLC – Lassen County Superior Court, Case No. 62973; Jauregui v. Cyctec Engineered Materials, Inc. – Orange County Superior Court, Case No. 30-2020-01164932-CU-OE-CXC

BLUMENTHAL NORDREHAUG
BHOWMIK DE BLOUW LLP
2255 CALLE CLARA
LA JOLLA, CA 92037
(858) 551-1223

JANUARY 21, 2025

VICTOR GONZALEZ

RE: TFI INTERNATIONAL
FILE NUMBER: CA2459.001

ATTORNEY FEES

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/01/21	ND	REVIEW AND ANALYZE ORIGINAL INTAKE NOTES. LEGAL RESEARCH REGARDING RELATED LITIGATION IN STATE AND FEDERAL COURT. RESEARCH DEFENDANT'S BUSINESS OPERATIONS IN CA. CONFERENCE WITH PLAINTIFF TO DISCUSS CLAIMS AND CASE STATUS.	3.90	850	3,315.00
07/06/21	ND	REVIEW DOCUMENTS AND EMAILS FROM PLAINTIFF REGARDING DFEH AND RETALIATION CLAIMS. LEGAL RESEARCH RECENT COURT OPINIONS REGARDING THE SAME. CONFERENCE WITH PLAINTIFF TO DISCUSS FACTS AND OFF THE CLOCK MINIMUM WAGE CLAIMS.	3.70	850	3,145.00
07/16/21	ND	REVIEW AND ANALYZE ENTIRE EMPLOYMENT FILE FOR LEGAL CLAIMS. REVIEW ALL PAYSTUBS FOR 226(A) VIOLATIONS. LEGAL RESEARCH. CONFERENCE WITH PLAINTIFF TO OBTAIN BACKGROUND FACTS FOR COMPLAINT.	4.40	850	3,740.00
07/22/21	ND	REVIEW FACTS AND LAW. DRAFT COMPLAINT.	4.50	850	3,825.00
08/06/21	ND	DRAFT COMPLAINT. OBTAIN APPROVAL TO FILE FROM PLAINTFF. CONFERENCE WITH PLAINTIFF TO	4.20	850	3,570.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		ANSWER QUESTIONS AND DISCUSS POTENTIAL OUTCOMES.			
08/12/21	ND	REVIEW DOCUMENTS AND CASE FILE. DRAFT INTERNAL CASE NOTES MEMO DETAILING CLAIMS.	2.00	850	1,700.00
08/27/21	ND	RESEARCH PAGA CLAIMS. DRAFT PAGA NOTICE. UPLOAD TO LWDA WEBSITE. STATUS UPDATE TO PLAINTIFF.	2.00	850	1,700.00
10/26/21	JH	REVIEW/ANALYZE PLAINTIFF'S DOCS; RESEARCH RELATED MATTER	1.00	750	750.00
11/09/21	RE	REVIEW CASE NOTES/DAMAGE ANALYSIS	0.50	675	337.50
11/09/21	RE	REVIEW & ANALYZE EMPLOYMENT FILE DOCUMENTS	1.00	675	675.00
11/09/21	RE	REVIEW, EDIT & FINALIZE CLASS ACTION COMPLAINT DRAFT; FINALIZE DRAFT	2.00	675	1,350.00
11/09/21	SB	REVIEW COMPLAINT FOR FILING, ANALYZE, ADVISE ND	2.80	450	1,260.00
11/10/21	RE	[PAGA] DRAFT PAGA ONLY REPRESENTATIVE ACTION COMPLAINT	2.75	675	1,856.25
11/10/21	ND	REVIEW PAGA NOTICE. REVIEW AND REVISE PAGA ONLY COMPLAINT. DISCUSS WITH R. EHMANN. STATUS UPDATE TO PLAINTIFF.	1.50	850	1,275.00
11/11/21	RE	[CLASS] RESEARCH LOCATION RE CERTIFICATE OF COUNSEL; PREPARE SUMMONS, CIVIL COVER SHEET, AND CERTIFICATE OF COUNSEL	0.50	675	337.50
11/11/21	RE	[PAGA] PREPARE SUMMONS, CIVIL COVER SHEET, AND CERTIFICATE OF COUNSEL	0.40	675	270.00
11/11/21	SB	REVISE COMPLAINT FOR FILING, ADVISE ND	2.80	450	1,260.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
11/12/21	RE	EMAIL TO ND RE REST BREAK ALLEGATIONS IN DRAFT COMPLAINT	0.20	675	135.00
11/12/21	RE	[CLASS] REVIEW, EDIT & FINALIZE CLASS ACTION COMPLAINT PACKAGE; FILE IN RIVERSIDE SUP. CT.	1.25	675	843.75
11/12/21	RE	[PAGA] REVIEW, EDIT & FINALIZE PAGA ONLY COMPLAINT PACKAGE; FILE IN RIVERSIDE SUP. CT.	1.25	675	843.75
11/16/21	RE	[CLASS] REVIEW COURT RETURNED DOCUMENTS; REVIEW DOCKET; MEMO TO FIRM RE JUDICIAL/DEPARTMENT ASSIGNMENT AND STATUS OF INITIAL CASE MANAGEMENT CONFERENCE	0.50	675	337.50
11/16/21	JH	REVIEW/ANALYZE FIELD COMPLAINT; COORDINATE DISCOVERY WITH HD	0.40	750	300.00
11/17/21	RE	[PAGA] REVIEW COURT RETURNED DOCUMENTS; REVIEW DOCKET; MEMO TO FIRM RE JUDICIAL/DEPARTMENT ASSIGNMENT AND STATUS OF INITIAL CASE MANAGEMENT CONFERENCE	0.50	675	337.50
11/17/21	RE	UPLOAD PAGA ONLY COMPLAINT TO LWDA WEBSITE; SAVE CONFIRMATION FOR FUTURE VERIFICATION OF NOTICE TO LWDA	0.40	675	270.00
12/28/21	JH	REVIEW FILE AND DOCKET; ASSESS STATUS OF MATTER; ADVISE TEAM	0.40	750	300.00
12/28/21	RE	REVIEW FILE; CONFER W S PUCHE RE STATUS OF SERVICE OF PROCESS	0.20	675	135.00
12/28/21	RE	[PAGA] PREPARE INITIAL DOCUMENTS FOR SERVICE OF PROCESS; IDENTIFY REGISTERED AGENT; SEND OUT FOR SERVICE VIA KNOX	0.80	675	540.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
12/28/21	RE	[CLASS] REVIEW DOCKET; PULL NOTICE OF CASE MANAGEMENT CONFERENCE	0.30	675	202.50
12/28/21	RE	[CLASS] PREPARE INITIAL DOCUMENTS FOR SERVICE OF PROCESS; SEND OUT FOR SERVICE VIA KNOX	0.70	675	472.50
12/29/21	RE	EMAIL TO KNOX RE SERVICE OF PROCESS OF PAGA ONLY ACTION	0.20	675	135.00
01/03/22	RE	REVIEW FILE & CHECK STATUS OF SERVICE OF CLASS ACTION CASE; EMAIL TO S JULIAN RE STATUS OF SERVICE RE CMC STATEMENT UPDATE	0.20	675	135.00
01/03/22	RE	[CLASS] FILE POS OF SUMMONS; MEMO TO FIRM RE INITIATION OF WRITTEN DISCOVERY	0.50	675	337.50
01/03/22	RE	[PAGA] FILE POS OF SUMMONS; MEMO TO FIRM RE INITIATION OF WRITTEN DISCOVERY	0.50	675	337.50
01/03/22	JH	REVIEW/ANALYZE PLAINTIFF'S CMC STMT; ADVISE SP	0.40	750	300.00
01/03/22	SP	REVIEWED FILE AND SERVICE OF SUMMONS AND COMPLAINT. CORRESPONDED WITH TEAM REGARDING SERVICE. FINALIZED CMC STATEMENT. DRAFTED PROOF OF SERVICE. FILED CASE MANAGEMENT STATEMENT WITH THE COURT.	1.90	675	1,282.50
01/10/22	JH	REVIEW DRAFT DISCOVERY TO DEFENDANT; ADVISE HD AND VR	0.60	750	450.00
01/28/22	JH	REVIEW/RESPOND TO CORRESPONDENCE FROM DEFENSE COUNSEL; DISCUSS WITH TEAM	0.50	750	375.00
01/31/22	JH	REVIEW/ANALYZE NOTICE OF REMOVAL AND SUPPORTING DOCUMENTATION; ASSESS	1.00	750	750.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		POTENTIAL REMAND; RESEARCH JUDICIAL ASSIGNMENT			
02/01/22	JH	REVIEW/REVISE STIP RE DEFENDANT'S DEADLINE TO FILE RESPONSIVE PLEADING	0.40	750	300.00
02/02/22	JH	REVIEW AND RESEARCH JUDICIAL ASSIGNMENT	0.50	750	375.00
02/02/22	JH	PREPARE FOR AND ATTEND MEET AND CONFER CALL WITH DEFENSE COUNSEL	0.70	750	525.00
02/15/22	JH	REVIEW REVISIONS TO STIP TO TRANSFER; ADVISE VR	0.40	750	300.00
02/24/22	JH	REVIEW ORDER TO TRANSFER; CONFER WITH CALENDAR; ADVISE TEAM	0.30	750	225.00
02/25/22	JH	REVIEW ORDER FROM NEW JUDICIAL ASSIGNMENT IN ND CAL.; CIRCULATE AND ADVISE TEAM	0.40	750	300.00
02/25/22	JH	PREPARE DECLINATION OF MAGISTRATE JX; FINALIZE FOR FILING	0.20	750	150.00
03/01/22	JH	REVIEW ORDER OF REASSIGNMENT; RESEARCH NEW JUDICIAL ASSIGNMENT	0.40	750	300.00
03/02/22	JH	REVIEW COURT ORDER; CIRCULATE AND ADVISE TEAM	0.30	750	225.00
03/21/22	JH	REVIEW CORRESPONDENCE FROM DEFENSE COUNSEL; RESEARCH STATUS OF RELATED MATTER; DISCUSS WITH AJB; CALL DEFENSE COUNSEL	1.00	750	750.00
03/22/22	JH	REVIEW AND REVISE STIP TO EXTEND TIME TO RESPOND	0.30	750	225.00
04/21/22	JH	REVIEW DEFENDANT'S MOTIONS; ADVISE SP ON MOTION TO STAY OPP AND MOTION TO DISMISS OPP	1.00	750	750.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
04/25/22	ND	REVIEW AND ANALYZE DATA PRODUCED FOR MEDIATION PURPOSES. ANALYZE COURT DOCKET AND CASE FILE. REVIEW RELATED CASE OVERLAP. CONFERENCE WITH PLAINTIFF TO DISCUSS CLAIMS AND OBTAIN FACTS FOR MEDIATION BRIEF.	4.60	850	3,910.00
04/27/22	JH	REVIEW JPA	0.30	750	225.00
04/27/22	JH	DISCUSS MOTION TO DISMISS AND MOTION TO STAY OPP WITH SP; ADVISE ACCORDINGLY	0.70	750	525.00
04/28/22	JH	REVIEW FILE AND STATUS OF RELATED ACTIONS; PREPARE PLAINTIFF'S CMC STMT	0.50	750	375.00
04/28/22	ND	REVIEW AND ANALYZE JOINT PROSECUTION AGREEMENT AND COMPLAINTS. SEND JPA TO PLAINTIFF FOR SIGNATURE. CALL TO DISCUSS JPA AND UPCOMING MEDIATION. FOLLOW UP FOR SIGNATURE ON JPA.	1.30	850	1,105.00
05/01/22	ND	REVIEW AND RESEARCH PREVIOUS SETTLEMENTS WITH SIMILAR CLAIMS AND WORKWEEKS FOR MEDIATION VALUATION. PREPARE FOR MEDIATION.	2.90	850	2,465.00
05/04/22	JH	REVIEW FILE; RESEARCH LOCAL RULES AND CHAMBER RULES FOR JUDICIAL ASSIGNMENT; PREPARE FOR AND ATTEND MEET AND CONFER CALL	0.80	750	600.00
05/05/22	JH	ASSESS CLAIMS, CASE NOTES, AND EXHIBIT BOOK; REVIEW, REVISE, FINALIZE AND SERVE, FIRST SET OF PAGA DISCOVERY; ADVISE TEAM AND COORDINATE WITH CALENDAR	3.00	750	2,250.00
05/06/22	JH	REVIEW ANALYZE DEFENDANT'S MOTION TO STAY REPLY AND MOTION TO DISMISS REPLY;	2.00	750	1,500.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		CIRCULATE AND ADVISE TEAM			
05/09/22	JH	REVIEW/ANALYZE DEFENDANT'S CMC STMT	0.40	750	300.00
05/09/22	JH	REVIEW ND CAL STANDING ORDERS; CORRESPONDENCE WITH DEFENSE COUNSEL RE MEET AND CONFER REQUIREMENTS	0.40	750	300.00
05/10/22	ND	REVIEW AND ANALYZE MEDIATION BRIEFS AND EXHIBITS ATTACHED THERETO IN PREPARATION FOR MEDIATION. REVIEW PAY STUS EXEMPLARS AND WRITTEN WAGE AND HOUR POLICY DOCUMENTS. LEGAL RESEARCH.	3.00	850	2,550.00
05/11/22	SP	REVIEWED AND ANALYZED CASE FILE. DRAFTED ASSOCIATION OF COUNSEL.	1.90	675	1,282.50
05/12/22	JH	REVIEW ORDER FROM COURT DEFERRING DEF. MTS; COORDINATE WITH TEAM; CIRCULATE	0.40	750	300.00
05/12/22	JH	REVIEW STANDING ORDERS; PREPARE FOR CONFERENCE WITH COUNSEL; DRAFT ADR CERTIFICATION; CALL CLIENT RE SAME	0.60	750	450.00
05/12/22	JH	PREPARE FOR AND ATTEND RULE 26F/INITIAL CMC MEET AND CONFER WITH DEFENSE COUNSEL; ADVISE TEAM ACCORDINGLY	0.80	750	600.00
05/16/22	JH	REVIEW/ANALYZE FILE AND STATUS OF DISCOVERY PREPARE AND APPEAR FOR CMC; CALL WITH DEFENSE COUNSEL	0.50	750	375.00
05/17/22	JH	REVIEW ORDER SETTING TSC; CIRCULATE AND ADVISE TEAM	0.30	750	225.00
05/18/22	JH	REVIEW/ANALYZE FILE; POST-MEDIATION CORRESPONDENCE WITH	1.50	750	1,125.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
		CO-COUNSEL RE STRATEGY; CALL RE SAME; PREAPRE NOTICE OF ASSOCIATION OF COUNSEL			
05/18/22	JH	REVIEW LOCAL RULES; RESERACH RE ADMIN MOTION TO CONSOLIDATE; ADVISE TEAM	1.00	750	750.00
05/19/22	JH	FOLLOW UP CALL WITH CO-COUNSEL	0.50	750	375.00
05/20/22	JH	DRAFT ADMINISTRATIVE MOTION TO RELATE AND CONSOLIDATE	1.80	750	1,350.00
05/20/22	SP	REVIEWED AND ANALYZED PLEADINGS, CASE NOTES AND ORDERS. DRAFTED JOINT 26(F) CONFERENCE REPORT.	5.30	675	3,577.50
05/20/22	JH	REVIEW FILE AND CASE NOTES; REVIEW AND REVISE DRAFT OF JOINT CMC STMT/RULE 26F REPORT	1.70	750	1,275.00
05/23/22	JH	CORRESPONDENCE WITH CO-COUNSEL; SEPARATE CORRESPONDECE WITH DEFENSE COUNSEL	0.50	750	375.00
05/23/22	JH	CALL WITH CO-COUNSEL; REVISE ADMINISTRATIVE MOTION ACCORDINGLY	0.60	750	450.00
05/24/22	JH	CALL WITH DEFENSE COUNSEL AND CO-COUNSEL RE ADMIN MOTION; F/U CALL WITH CO-COUNSEL RE SAME; CORRESPONDNCE WITH ALL RE CONSOLIDATION	1.00	750	750.00
05/25/22	JH	REVIEW DEFENDANT'S REVISIONS TO ADMINISTRATIVE MOTION; DISCUSS WITH CO-COUNSEL	1.00	750	750.00
05/26/22	JH	REVIEW/ANALZYE DEFENDANT'S MOTION TO STAY PAGA ACTION; DISCUSS WITH AJB; ADVISE SP	1.50	750	1,125.00
05/26/22	JH	REVIEW ORDERS RE RELATED MATTERS AND REASSIGNMENT OF	0.50	750	375.00

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
CASES					
05/27/22	JH	F/U CORRESPONDENCE WITH CO-COUNSEL AND DEFENSE COUNSEL RE CONSOLIDATED COMPLAINT AND ANTICIPATED PLEADING CHALLENGES.	0.50	750	375.00
05/30/22	SP	REVIEW AND ANALYZE ORDERS, PERFORM RESEARCH AND PREPARE NOTICE OF APPEARANCE.	1.10	675	742.50
06/08/22	SP	RESEARCHED, DRAFTED, REVISED, SERVED AND FILED OPPOSITION TO MOTION TO STAY.	5.10	675	3,442.50
06/09/22	JH	CALL WITH CALENDAR CLERK RE INITIAL CMC; ADVISE TEAM	0.30	750	225.00
11/29/22	ND	LEGAL RESEARCH REGARDING RECENT CASE LAW AND STATUTES UNDER THE FEDERAL MOTOR CARRIER SAFETY ACT. ANALYZE SETTLEMENTS FOR TRUCK DRIVERS. CALL WITH PLAINTIFF TO DISCUSS FACTS PERTINENT TO EXEMPTION ISSUES UNDER THE FMCSA.	3.20	850	2,720.00
<u>TOTAL BILLED HOURS</u>					
JEFF HERMAN		33.30 hr @ 750.00	\$	24,975.00	
NICK DEBLOUW		41.20 hr @ 850.00	\$	35,020.00	
RICO EHMAN		14.65 hr @ 675.00	\$	9,888.75	
SCOTT BLUMENTHAL		5.60 hr @ 450.00	\$	2,520.00	
SERGIO PUCHE		15.30 hr @ 675.00	\$	10,327.50	
TOTAL PROFESSIONAL SERVICES			110.05		<u>\$ 82,731.25</u>
COSTS ADVANCED					
08/27/21	PAGA FILING FEE				75.00
11/16/21	FILING/ONE LEGAL FEE				1,508.17
11/16/21	FILING/ONE LEGAL FEE				478.67
12/28/21	COURT DOCUMENT FEE				1.00

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
12/28/21	COURT DOCUMENT FEE	6.00
01/02/22	MESSENGER - KNOX	146.75
01/02/22	MESSENGER - KNOX	55.15
01/04/22	FILING FEE/ONELEGAL FEE	38.86
01/04/22	FILING FEE/ONELEGAL FEE	16.27
01/04/22	FILING FEE/ONELEGAL FEE	16.27
01/05/22	ONE LEGAL FILING	16.27
01/31/22	KNOX ATTORNEY SERVICES	55.15
01/31/22	KNOX ATTORNEY SERVICES	146.75
04/29/22	(PAGA MATTER -)ONE LEGAL INVOICE - 04038720	16.78
05/03/22	(PAGA MATTER) ONE LEGAL INVOICE -04047178	<u>16.78</u>
	TOTAL COSTS ADVANCED	<u>\$ 2,593.87</u>
TOTAL CURRENT CHARGES		<u>\$ 85,325.12</u>

Blumenthal Nordrehaug Bhowmik DeBlouw LLP

2255 CALLE CLARA
LA JOLLA, CA - California 92037-3107

INVOICE

Invoice # 1
Date: 01/21/2025
Due On: 02/20/2025

Victor Gonzalez
2409 West Via Nina Street (updated 1/3/25)
Montebello, CA 90640

CA2459

Tforce Freight, Inc.

Services

Type	Date	Notes	Quantity	Rate	Total
Service	06/14/2022	Review and Revise: Review/analyze Defendant's discovery responses	1.00	\$750.00	\$750.00
Service	06/15/2022	Review and Analyze: Review and analyze Defendant's motion to stay reply	1.30	\$750.00	\$975.00
Service	06/20/2022	Review and Analyze: Review/analyze motion to stay tentative ruling; advise SP re oral argument	0.50	\$750.00	\$375.00
Service	06/21/2022	Reviewed Tentative ruling, reviewed filings and pleadings and prepared for oral argument. Appeared for hearing. Advised team.	1.60	\$675.00	\$1,080.00
Service	06/21/2022	Discuss with SP re hearing on motion to stay; advise	0.40	\$750.00	\$300.00
Service	06/27/2022	Review and Revise: Review and further revise draft consolidated complaint	0.70	\$750.00	\$525.00
Service	06/30/2022	Correspondence with co-counsel re defendant's requested continuance and Rule 26f conf.; discuss with SP	0.50	\$750.00	\$375.00
Service	07/05/2022	Review and Analyze: Review/analyze draft Rule 26f con report in advance of Rule 26 f conf; advise SP; review revise Rule 26f report	1.50	\$750.00	\$1,125.00
Service	07/13/2022	Review and Analyze: Review/analyze minute order from Initial CMC: discuss with co-counsel; advise team	0.50	\$750.00	\$375.00

Service	07/19/2022	Review and Analyze: Review/analyze Defendant's responses to Plaintiffs Mish's discovery requests	1.00	\$750.00	\$750.00
Service	07/25/2022	Review and Analyze: Further review/analyze Defendant's motion to dismiss; research authority; confer with co-counsel accordingly	1.50	\$750.00	\$1,125.00
Service	07/26/2022	Review documents and discovery for initial disclosures. Communication with Counsel.	0.90	\$675.00	\$607.50
Service	07/27/2022	Review and Analyze: Review/analyze Defendant's initial disclosures	0.50	\$750.00	\$375.00
Service	07/29/2022	Spoke with client about witnesses. Sent correspondence to Co-Counsel.	1.30	\$675.00	\$877.50
Service	07/29/2022	Correspondence with co-counsel re depositions and witnesses identified by Defendant; discuss with clients	0.50	\$750.00	\$375.00
Service	07/29/2022	Review/analyze notices of deposition; circulate and advise team	0.40	\$750.00	\$300.00
Service	08/16/2022	Reviewed file in anticipation of deadline to object to deposition.	0.20	\$675.00	\$135.00
Service	08/22/2022	Reviewed correspondence and discovery file re deposition deadlines and calendaring for next weeks depositions.	1.40	\$675.00	\$945.00
Service	08/23/2022	Correspondence with co-counsel and defense counsel	0.40	\$750.00	\$300.00
Service	08/24/2022	Prepared for meet and confer re: discovery and mediation. Met and Conferred.	1.60	\$675.00	\$1,080.00
Service	08/25/2022	Discuss with SP and co-counsel meet and confer call with Defendant; review draft PO	0.70	\$750.00	\$525.00
Service	08/30/2022	Call with co-counsel re third related matter; discuss with AJB	0.50	\$750.00	\$375.00
Service	09/01/2022	Call with co-counsel and counsel in related matter; discuss with team	0.50	\$750.00	\$375.00
Service	09/06/2022	Review stipulation re admin motion to relate cases; discuss with co-counsel	0.50	\$750.00	\$375.00
Service	09/14/2022	Review notice of ruling	0.30	\$750.00	\$225.00
Service	09/23/2022	Review/analyze discovery propounded by co-counsel	1.00	\$750.00	\$750.00
Service	09/26/2022	Review/analyze Defendant's motion to stay	0.70	\$750.00	\$525.00
Service	09/27/2022	Review court order; advise team	0.40	\$750.00	\$300.00
Service	09/27/2022	Call with co-counsel in preparation for joint call with	1.00	\$750.00	\$750.00

		plaintiff and defense counsel; prepare for and attend all counsel call per Court order			
Service	09/28/2022	Discuss consolidation with AJB	0.40	\$750.00	\$300.00
Service	09/29/2022	Call with co-counsel re Deposition of Ramon Baez and upcoming CMC; advise team	0.50	\$750.00	\$375.00
Service	09/29/2022	Appear for CMC; advise team	0.40	\$750.00	\$300.00
Service	09/30/2022	Meet and confer call with defense counsel re responses to Mish discovery; f/u call with co-counsel	1.60	\$750.00	\$1,200.00
Service	10/03/2022	Review and prepare for meet and confer conference call. Attended M&C conference call. Updated notes.	1.70	\$675.00	\$1,147.50
Service	10/06/2022	Review depo notices prepare and served by co-counsel	0.50	\$750.00	\$375.00
Service	10/11/2022	Review/analyze Defendant's discovery requests; discuss with and advise team	1.00	\$750.00	\$750.00
Service	10/12/2022	Discussion with JSH re upcoming Depositions and strategy.	0.20	\$675.00	\$135.00
Service	10/13/2022	Review draft opposition to motion to stay prepare by co-counsel; advise SP re discovery	1.00	\$750.00	\$750.00
Service	10/17/2022	Draft shell for Plaintiff's responses to Defendant's Request for Production and Interrogatories. Draft Plaintiff's Verification.	2.50	\$250.00	\$625.00
Service	10/18/2022	Review Opposition to motion to stay	1.00	\$750.00	\$750.00
Service	10/24/2022	Review/analyze Defendant's Motion to Stay reply	1.00	\$750.00	\$750.00
Service	10/27/2022	Review/analyze tentative ruling on motion to stay; discuss with co-counsel	0.60	\$750.00	\$450.00
Service	10/28/2022	Prepare and appear for hearing on motion to stay; discuss with co-counsel; advise team	1.00	\$750.00	\$750.00
Service	10/31/2022	Review draft amended complaint with facts re tapping plaintiff	0.60	\$750.00	\$450.00
Service	11/07/2022	Review court minute order; advise team	0.40	\$750.00	\$300.00
Service	11/07/2022	Review draft report requested by Court; advise co-counsel	0.40	\$750.00	\$300.00
Service	11/14/2022	Review/analyze Defendant's motion to dismiss SAC	1.00	\$750.00	\$750.00
Service	11/15/2022	Prepare and appear for CMC; advise team	1.00	\$750.00	\$750.00
Service	11/17/2022	Review draft stip re briefing scheduled on MTD; advise co-counsel	0.40	\$750.00	\$300.00
Service	11/21/2022	Review Court order on stipulation; circulate to team	0.30	\$750.00	\$225.00

		and advise			
Service	12/05/2022	Review/analyze draft from co-counsel on Plaintiffs' opposition to Defendant's motion to dismiss; advise co-counsel	0.70	\$750.00	\$525.00
Service	12/10/2022	Review/analyze mediators proposal	0.40	\$750.00	\$300.00
Service	12/12/2022	Review docs, analyze re settlement issues.	2.50	\$995.00	\$2,487.50
Service	12/13/2022	Correspondence with co-counsel re defendant's acceptance of mediator's proposal; discuss with team	0.30	\$750.00	\$225.00
Service	01/24/2023	Reviewed case file and updated hearing calendar.	0.40	\$675.00	\$270.00
Service	02/01/2023	Reviewed case notes, orders and correspondence to prepare for upcoming deadlines.	0.30	\$675.00	\$202.50
Service	02/06/2023	Review email and research issue; respond to co-counsel question and provide documents	0.60	\$950.00	\$570.00
Service	02/20/2023	Review/analyze draft longform settlement agreement prepared by co-counsel	0.50	\$750.00	\$375.00
Service	03/13/2023	Further review draft longform agreement and revise; discuss with KN	1.00	\$750.00	\$750.00
Service	03/14/2023	Review and revise draft agreement; analysis of issues; review comments from JH; email to co-counsel	3.00	\$950.00	\$2,850.00
Service	03/14/2023	Review long form, analyze, advise KN.	1.75	\$995.00	\$1,741.25
Service	03/17/2023	Review procedural history of matters; draft/revise stip to remand; circulate to co-counsel	1.00	\$750.00	\$750.00
Service	03/20/2023	F/u correspondence with co-counsel remand process; discuss internally w team	0.40	\$750.00	\$300.00
Service	03/20/2023	Analysis of approval issues; review agreement draft; emails with co-counsel re settlement and approval; research and respond to NBB questions	1.50	\$950.00	\$1,425.00
Service	03/20/2023	Review docs, analyze re drafting. Advise JH.	2.25	\$995.00	\$2,238.75
Service	03/24/2023	Assess status of longform; f/u with co counsel re same	0.30	\$750.00	\$225.00
Service	04/03/2023	Review revised Agreement; provide comments and revisions to co-counsel	1.50	\$950.00	\$1,425.00
Service	04/03/2023	Review/analyze co-counsels further revisions on longform; discuss with KN and NBB	0.70	\$750.00	\$525.00
Service	04/11/2023	Review file and status of longform agreement; f/u with co-counsel	0.30	\$750.00	\$225.00

Service	04/13/2023	Discuss with NBB; f/u w co-counsel re longform agreement and amended complaint	0.30	\$750.00	\$225.00
Service	04/13/2023	Draft: Reviewed and analyzed file and pertinent documents in order to draft Amended Complaint	1.70	\$450.00	\$765.00
Service	04/18/2023	Reviewed Settlement agreement, operative complaint, PAGA complaint and PAGA letters. Reviewed and revised First Amended Class and Representative Action Complaint. Updated Team.	1.90	\$675.00	\$1,282.50
Service	04/19/2023	Revise/revise draft First Amended Class and Representative Action Complaint; advise team; circulate to joint prosecution for review	1.50	\$750.00	\$1,125.00
Service	05/02/2023	Review/analyze Defendant's proposed revisions to draft longform; discuss with KN advise co-counsel	1.00	\$750.00	\$750.00
Service	05/17/2023	Review Defendant's revisions to the Agreement; memo to co-counsel re issues; analysis of settlement procedure and amendment; advise JH	2.00	\$950.00	\$1,900.00
Service	05/17/2023	Correspondence with co-counsel re FAC and Defendant's proposed revisions to longform; analyze and discuss with KN	0.60	\$750.00	\$450.00
Service	05/25/2023	Review update from co-counsel re longform agreement and amended complaint	0.30	\$750.00	\$225.00
Service	06/01/2023	Additional correspondence with co-counsel re status of approval and settlement docs	0.40	\$750.00	\$300.00
Service	06/15/2023	Call with co-counsel re progress on settlement agreement and operative pleading	0.40	\$750.00	\$300.00
Service	06/15/2023	Review revised draft Agreement; analysis of issues; advise JH	1.00	\$950.00	\$950.00
Service	06/16/2023	Review/analyze prior settlement to assess impact on settlement this matter; discuss with co-counsel	0.60	\$750.00	\$450.00
Service	07/03/2023	Review spreadsheet of employees who signed severance agreements; correspondence with defense counsel re same; correspondence with co-counsel re settlement admin bid	0.40	\$750.00	\$300.00
Service	07/05/2023	Review file and status of settlement agreement; f/u with defense counsel re same; review/analyze Defendant's revisions to stip and draft TAC; discuss with Co-counsel	1.00	\$750.00	\$750.00
Service	07/06/2023	Further discuss w/ KN Defendant's proposed revisions to longform; advise co-counsel re same	0.40	\$750.00	\$300.00
Service	07/14/2023	Review Admin bids sent from co-counsel; advise them accordingly	0.20	\$750.00	\$150.00
Service	07/20/2023	Review issues re TAC and revised Agreement;	1.00	\$950.00	\$950.00

		review email notes and respond to issues			
Service	07/20/2023	Review co-counsel revisions/comments to TAC, Stip and Longform; discuss with KN; correspondence with co-counsel re same	0.50	\$750.00	\$375.00
Service	07/28/2023	Correspondence from defense counsel re status of settlement agreement	0.30	\$750.00	\$225.00
Service	07/31/2023	Call with co-counsel re revisions to the settlement agreement; call with defense counsel and co-counsel re same	0.70	\$750.00	\$525.00
Service	08/01/2023	Advise KN re meet and confer call with defense counsel re settlement agreement	0.30	\$750.00	\$225.00
Service	08/25/2023	Review costs; advise KN; discuss additional revisions and circulate to co-counsel	0.50	\$750.00	\$375.00
Service	09/06/2023	F/u with defense counsel and co-counsel on FAC and longform agreement	0.30	\$750.00	\$225.00
Service	09/12/2023	Call with defense counsel re longform agreement edits; advise co-counsel	0.50	\$750.00	\$375.00
Service	09/21/2023	Review/analyze Defendant's further revisions to longform; discuss with KN: discuss with co-counsel	0.50	\$750.00	\$375.00
Service	09/26/2023	Further discuss with co-counsel re defendants additional revisions to longform	0.50	\$750.00	\$375.00
Service	10/04/2023	F/u with defense counsel and co counsel re stip and fac; circulate final longform for signature.	0.40	\$750.00	\$300.00
Service	10/10/2023	Review and analyze mediation notes and results. Review and analyze settlement agreement terms and exhibits thereto. Send agreement to Plaintiff for signature. Call to discuss terms and settlement amounts.	1.50	\$850.00	\$1,275.00
Service	10/11/2023	Review/analyze order on coordination; advise TM	0.30	\$750.00	\$225.00
Service	10/17/2023	Review/analyze draft class notice prepare by co-counsel; discuss with KN	0.40	\$750.00	\$300.00
Service	10/19/2023	Review/analyze and revise draft MPA prepared by co-counsel; discuss with KN	1.00	\$750.00	\$750.00
Service	11/02/2023	Review draft class notice; discuss with co-counsel	0.30	\$750.00	\$225.00
Service	11/13/2023	Meet and confer call with defense counsel re agreement and settlement approval process	0.40	\$750.00	\$300.00
Service	11/21/2023	Review report prepared by co-counsel; advise re revisions	0.50	\$750.00	\$375.00
Service	11/27/2023	Planned and prepared for upcoming Status Conference.	0.50	\$450.00	\$225.00

Service	11/27/2023	Research court case docket (Federal) and obtain the information for tomorrow's Status Conference hearing via Zoom. Forward to appearing attorney Puche.	0.20	\$250.00	\$50.00
Service	11/28/2023	Discuss with ND re strategy going forward	0.60	\$750.00	\$450.00
Service	11/29/2023	Review emails and status; conf with ND re process and issues	0.50	\$950.00	\$475.00
Service	11/29/2023	Call with co-counsel; further revise longform; circulate and discuss with ND and KN	0.50	\$750.00	\$375.00
Service	12/04/2023	F/u correspondence with co-counsel re revised longform; discuss with ND, NBB and KN; respond accordingly	0.60	\$750.00	\$450.00
Service	12/04/2023	Analysis of issue; review revisions to agreement; review emails and respond	0.75	\$950.00	\$712.50
Service	12/05/2023	Further correspondence with co-counsel re revised agreement and FAC; discuss with NBB ND and KN	1.00	\$750.00	\$750.00
Service	12/06/2023	Call with defense counsel re issues with agreement; f/u call with co-counsel re same; discuss with ND	0.60	\$750.00	\$450.00
Service	12/06/2023	Conference Call re: Settlement.	0.80	\$675.00	\$540.00
Service	12/11/2023	Reviewed file, pertinent documents, and court's docket to draft joint status conference statement; Drafted joint status conference statement;	1.00	\$450.00	\$450.00
Service	12/12/2023	Revised joint status conference statement; Conferred with team re strategy for drafting joint status conference statement; Emails to and from OPC re joint status conference statement.	1.40	\$450.00	\$630.00
Service	12/12/2023	Correspondence with Counsel re: Joint statement. Discussion with TM and NJD re: Joint Statement. Provided revisions to Joint Statement. Finalized and arranged for service and filing of Joint Statment.	1.90	\$675.00	\$1,282.50
Service	12/15/2023	Prepared and appeared for call regarding settlement documents and next steps regarding preliminary approval papers.	0.90	\$675.00	\$607.50
Service	12/17/2023	Review file; draft declaration of Victor Gonzalez; email to client re draft declaration	2.50	\$675.00	\$1,687.50
Service	12/18/2023	Discuss with NJD, JSH and CL. Review case docket and calendar. Prepare CL for hearing.	1.50	\$675.00	\$1,012.50
Service	12/18/2023	Prepare for status conference; Discuss with Sergio re: same.	0.40	\$750.00	\$300.00
Service	12/19/2023	Attend Status Conference hearing; Review and analyze discussions with client in preparation for same.	0.50	\$750.00	\$375.00

Service	12/20/2023	Review/analyze Defendant's further revisions to longform; discuss with KN	0.50	\$750.00	\$375.00
Service	12/20/2023	Review revised Agreement; review issues from JH; analyze and respond to issues	0.75	\$950.00	\$712.50
Service	12/21/2023	Further discuss with KN Defendant's further revisions to agreement; advise co-counsel	0.60	\$750.00	\$450.00
Service	12/22/2023	Further revise agreement; discuss with co-counsel; discuss with defense counsel	0.50	\$750.00	\$375.00
Service	01/05/2024	Analysis of issues regarding settlement and final issues; emails with staff; discuss with NBB	0.75	\$950.00	\$712.50
Service	01/05/2024	Strategic call with co-counsel re next steps; discuss with team	1.00	\$750.00	\$750.00
Service	01/05/2024	Review and analyze m first amended settlement agreement. Send agreement to Plaintiff for signature. Call to discuss need for amendment and timing of settlement payout.	0.90	\$850.00	\$765.00
Service	01/10/2024	Call with defense counsel and co-counsel re longform and mtn to withdraw	1.00	\$750.00	\$750.00
Service	01/12/2024	Drafted Motion to be relieved as Counsel, declaration and proposed order and attachments. Sent to JSH. Corresponded with team re: Motion.	2.80	\$675.00	\$1,890.00
Service	01/24/2024	Telephone call to Sacramento supervisor clerk of the court, Denise regarding request for hearing date for Motion to be relived as Counsel for Plaintiff Gonzalez. Correspondence with Attorney Herman regarding the same.	0.30	\$250.00	\$75.00
Service	01/24/2024	Finalize documents for Motion to be Relieved as Counsel for Plaintiff Gonzalez. Insert Hearing date information and reservation No, etc. Execute and finalize Proof of Service.	1.00	\$250.00	\$250.00
Service	01/24/2024	Process and submit Motion to Be Relieved as Counsel as to Plaintiff Gonzalez to Court and serve via Fedex, Certified Mail and email on parties accordingly.	0.50	\$250.00	\$125.00
Service	01/29/2024	Review case docket and order re upcoming Status Conference (Federal Court). Prepare shell for Joint Status Report. Forward to Attorney Herman for completion and finalization.	0.50	\$250.00	\$125.00
Service	01/29/2024	Draft joint report; discuss with KN and NBB; circulate to co-counsel for review.	0.50	\$750.00	\$375.00
Service	01/30/2024	Draft/revise joint report; circulate to co-counsel and then defense counsel; review revisions; finalize and prepare for filing	1.00	\$750.00	\$750.00

Service	01/30/2024	review various drafts of the joint report; discuss with JH; respond to emails	1.00	\$950.00	\$950.00
Service	01/30/2024	Execute and finalize Certificate of Service. Process/ File and Serve the Joint Status Report via ECF.	0.50	\$250.00	\$125.00
Service	02/05/2024	Draft/revised ND Cal. Motion to Withdraw as Counsel of Record for Gonzalez; discuss with team	1.00	\$750.00	\$750.00
Service	02/06/2024	Further revise Mtn to Be Relieved for ND Cal; discuss with NBB; circulate to co-counsel for review	0.50	\$750.00	\$375.00
Service	02/06/2024	Reviewed correspondence, case notes, pleadings and calendar. Drafted and revised Motion to withdraw. Discussed with JSH and NJD. Drafted Declaration, revised declaration and finalized for JSH.	3.40	\$675.00	\$2,295.00
Service	02/21/2024	Corresp. with co-counsel re delays in settlement agreement execution	0.40	\$750.00	\$300.00
Service	02/26/2024	Draft Notice of Withdraw of Motion to be Relieved as Counsel for Victor Gonzalez. Forward to Attorney Herman for review and finalization.	1.00	\$250.00	\$250.00
Service	02/27/2024	Additional correspondence and revisions from defense counsel	0.40	\$750.00	\$300.00
Service	02/28/2024	Reveiwed calendar, docket, case file and correspondence in preparation for hearing/ appearance. Discussed with Team.	0.20	\$675.00	\$135.00
Service	03/06/2024	Reveiwed calendar, docket and case file for upcoming appearance/deadline. Discussed with team.	0.20	\$675.00	\$135.00
Service	03/13/2024	Discuss with NBB; f/u with co-counsel re MPA and FAC	0.30	\$750.00	\$225.00
Service	03/14/2024	Reviewed Court's tentative ruling re motion to be relieved as counsel.	0.20	\$450.00	\$90.00
Service	03/14/2024	Review file; confer w ND/JH re V. Gonzalez; edit V. Gonzalez declaration re enhancement award request/motion for preliminary approval; email to V. Gonzalez re draft declaration	1.00	\$675.00	\$675.00
Service	03/14/2024	Research and obtain court' tentative ruling Re Plaintiff's Hearing on Motion to be Relieved as Counsel. Forward to attorneys and advise accordingly.	0.30	\$250.00	\$75.00
Service	03/18/2024	F/u corresp with co-counsel re status of longform execution	0.20	\$750.00	\$150.00
Service	04/09/2024	Review fully executed agreement; advise NBB and KN; f/u with defense counsel and co-counsel re preliminary approval	0.50	\$750.00	\$375.00

Service	04/10/2024	Review Prelim motion docs for filing. Analyze.	2.75	\$995.00	\$2,736.25
Service	04/23/2024	Draft shell for Joint Status Report (Federal Court). Forward to Attorney Herman for completion and finalization.	0.30	\$250.00	\$75.00
Service	04/29/2024	Review order on CMC; circulate and confer with calendar	0.30	\$750.00	\$225.00
Service	04/29/2024	Planned and prepared for upcoming CMC; reviewed Court's notice of continued hearing.	0.80	\$450.00	\$360.00
Service	05/14/2024	Reviewed Court's order re Case Management Conference.	0.20	\$450.00	\$90.00
Service	05/15/2024	Review file; correspondence with co-counsel re status of MPA; discuss with KN and NBB	0.30	\$750.00	\$225.00
Service	05/22/2024	Review draft motion.	2.00	\$950.00	\$1,900.00
Service	05/24/2024	Review draft MPA prepared by co-counsel; discuss with KN	1.00	\$750.00	\$750.00
Service	05/24/2024	Review draft motion for preliminary approval; respond to emails; draft declaration ISO motion	2.50	\$950.00	\$2,375.00
Service	05/28/2024	review draft motion for preliminary approval; provide input to co-counsel regarding motion	2.00	\$950.00	\$1,900.00
Service	05/28/2024	Review Defendant's proposed revisions to MPA	0.50	\$750.00	\$375.00
Service	05/29/2024	Review revisions to the Motion and comments by Defendant; respond to co-counsel	1.00	\$950.00	\$950.00
Service	05/29/2024	Review file and docket; draft joint report; circulate to defense counsel for review; finalize and execute	0.60	\$750.00	\$450.00
Service	05/29/2024	Review/revise draft MPA prepared by co-counsel	1.00	\$750.00	\$750.00
Service	06/03/2024	Reviewed Court docket in preparation for upcoming Status Conference.	0.30	\$450.00	\$135.00
Service	06/04/2024	Planned and prepared for upcoming Status Conference.	0.60	\$450.00	\$270.00
Service	06/04/2024	Receive and review notice from the court regarding department change. Obtain remote appearance information for Department 4 for the CMC scheduled on 06/05/2024. Forward to appearing attorney.	0.20	\$250.00	\$50.00
Service	06/05/2024	Attended Status Conference; email to firm re case status following hearing.	1.30	\$450.00	\$585.00
Service	06/05/2024	Discuss with TM re CMC in PAGA action; advise	0.30	\$750.00	\$225.00
Service	06/20/2024	Review tentative ruling on MPA; discuss with KN and NBB	0.40	\$750.00	\$300.00

Service	06/20/2024	Reviewed and analyzed the Court's tentative ruling re motion for preliminary approval.	0.40	\$450.00	\$180.00
Service	07/05/2024	Corresp with Co-counsel re preliminary approval; discuss with KN and NBB	0.50	\$750.00	\$375.00
Service	07/08/2024	Review file; draft joint report; circulate to co-counsel for review	0.40	\$750.00	\$300.00
Service	07/09/2024	Legal research and analysis of issues raised by co-counsel email; respond	1.00	\$950.00	\$950.00
Service	07/12/2024	Review Court's order re Status Conference	0.40	\$750.00	\$300.00
Service	07/17/2024	Discuss with co-counsel re suppl. briefing ISO preliminary approval and next steps	0.50	\$750.00	\$375.00
Service	07/22/2024	Corresp. with co-counsel re revised notice of settlement	0.40	\$750.00	\$300.00
Service	07/23/2024	Execute and finalize Proof of Service. Process and submit Notice of Settlement to Court for filing via One Legal and serve via email.	0.50	\$250.00	\$125.00
Service	07/24/2024	Review/analyze draft suppl. brief re MPA requested by the court; advise Co-counsel	1.00	\$750.00	\$750.00
Service	07/24/2024	Receive and review rejection notice re Notice of Settlement. Re-submit the Notice of Settlement and Proof of Service per the court's instructions via One Legal.	0.30	\$250.00	\$75.00
Service	07/26/2024	Review revisions to suppl. brief iso of MPA	0.50	\$750.00	\$375.00
Service	07/26/2024	Review supplemental documents and briefing; emails with co-counsel; review Def emails and issues re PO; review and execute Amendment; memo to staff	1.00	\$950.00	\$950.00
Service	08/07/2024	Reviewed Court's order re joint report.	0.20	\$450.00	\$90.00
Service	08/07/2024	Review/analyze Court order; discuss with defense counsel and co-counsel re CMC	0.40	\$750.00	\$300.00
Service	08/19/2024	Reviewed Court notice of OSC.	0.20	\$450.00	\$90.00
Service	08/20/2024	Reviewed Court's notice re OSC.	0.20	\$450.00	\$90.00
Service	08/20/2024	Review OSC Order from court; discuss with Co-counsel; revise draft joint report prepared by co-counsel	0.40	\$750.00	\$300.00
Service	08/21/2024	Review revised Joint Report; corresp. with defense counsel and co-counsel re same	0.30	\$750.00	\$225.00
Service	08/29/2024	Review/analyze tentative ruling	0.30	\$750.00	\$225.00
Service	09/23/2024	Reviewed correspondence, calendar, orders and	0.40	\$675.00	\$270.00

		case management statement. Provided update to Client.			
Service	09/24/2024	Review file and MPA order; draft joint report; circulate to co-counsel and defense counsel; review revisions, finalize and prepare for filing	0.50	\$750.00	\$375.00
Service	09/24/2024	Review Federal Court Case Docket and confirm Status Conference still on calendar. Review current court order and status of matter. Draft shell Joint Status Report. Forward to attorney Herman for finalization.	0.30	\$250.00	\$75.00
Service	09/24/2024	Finalize Proof of Service. Process and file and serve The Joint Status Report via ECF.	0.30	\$250.00	\$75.00
Service	10/02/2024	Reviewed calendar, docket and correspondence for upcoming deadline/appearance and advised team.	0.20	\$675.00	\$135.00
Service	10/07/2024	Reviewed file and Court docket to determine status of OSC re dismissal; discussed with team; reviewed Court's notice of status conference and order; email to and from co-counsel re CMC Statement.	1.10	\$450.00	\$495.00
Service	10/07/2024	Email to and from co-counsel re joint CMC Statement; reviewed co-counsel's proposed joint CMC Statement.	0.60	\$450.00	\$270.00
Service	10/08/2024	Review file and court docket; drafted Plaintiff's OSC statement re dismissal; email to OPC re OSC statement; finalized and signed OSC statement; advised HD re filing/service.	1.30	\$450.00	\$585.00
Service	10/10/2024	Review preliminary calculations for final approval from settlement admin	0.30	\$750.00	\$225.00
Service	10/14/2024	Corresp. w defense counsel, co-counsel, and settlement administrator re timeline, data points, and class notice	0.50	\$750.00	\$375.00
Service	10/17/2024	Review emails and status; review documents and calculated next steps; email Admin	0.50	\$950.00	\$475.00
Service	10/20/2024	Reviewed file and court docket in preparation for upcoming OSC.	0.30	\$450.00	\$135.00
Service	10/29/2024	Reviewed Court's OSC re dismissal after settlement.	0.20	\$450.00	\$90.00
Service	11/26/2024	Review letter and dispute from Robles; emails with staff; email co-counsel	0.40	\$950.00	\$380.00
Service	12/17/2024	Discuss with co-counsel re MFA/Fee motion	0.40	\$750.00	\$300.00
Service	01/08/2025	Reviewed case docket, register of actions, cross referenced calendar and reviewed pleadings and case notes to analyze case appearance/deadline.	0.20	\$675.00	\$135.00
Service	01/14/2025	Discuss MFA with KN: follow up with co-counsel re	0.30	\$750.00	\$225.00

same					
Service	01/15/2025	Review/revised draft MFA/Fee Motion prepared by co-counsel; discuss with KN	1.00	\$750.00	\$750.00
Service	01/21/2025	Draft declaration ISO final approval	2.00	\$950.00	\$1,900.00
Services Subtotal					\$118,968.75

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	06/09/2022	One Legal Invoice No. 04134926	1.00	\$16.78	\$16.78
Expense	12/13/2023	One Legal Invoice No. 05570306	1.00	\$17.24	\$17.24
Expense	02/02/2024	FedEx	1.00	\$30.27	\$30.27
Expense	05/30/2024	One Legal Invoice No. 06074484	1.00	\$19.30	\$19.30
Expense	08/12/2024	One Legal Invoice No. 06275307	1.00	\$19.30	\$19.30
Expenses Subtotal					\$102.89

Time Keeper	Quantity	Rate	Total
Norm Blumenthal	9.25	\$995.00	\$9,203.75
Nicholas De Blouw	2.4	\$850.00	\$2,040.00
Ricardo Ehmann	3.5	\$675.00	\$2,362.50
Jeffrey Herman	73.7	\$750.00	\$55,275.00
Christine LeVu	0.9	\$750.00	\$675.00
Trevor Moran	12.5	\$450.00	\$5,625.00
Kyle Nordrehaug	26.75	\$950.00	\$25,412.50
Sergio Puche	24.0	\$675.00	\$16,200.00
Heather Drosi	8.7	\$250.00	\$2,175.00
Subtotal			\$119,071.64
Total			\$119,071.64

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1	02/20/2025	\$119,071.64	\$0.00	\$119,071.64
Outstanding Balance				\$119,071.64
Total Amount Outstanding				\$119,071.64

Please make all amounts payable to: Blumenthal Nordrehaug Bhowmik DeBlouw LLP

Please pay within 30 days.

LAFFEY MATRIX

History

Case Law

Contact us

Home

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375

6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363
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The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $i_{\frac{1}{2}}$ Years Out of Law School $i_{\frac{1}{2}}$ is calculated from June 1 of each year, when most law students graduate. $i_{\frac{1}{2}}1-3$ " includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $i_{\frac{1}{2}}4-7$ " applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $i_{\frac{1}{2}}1-3$ " from June 1, 1996 until May 31, 1999, would move into tier $i_{\frac{1}{2}}4-7$ " on June 1, 1999, and tier $i_{\frac{1}{2}}8-10$ " on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

JAMES HAWKINS APLC

James R. Hawkins, Esq. (#192925)
Gregory Mauro, Esq. (#222239)
Michael Calvo, Esq. (#314986)
Jeanne Sarmiento, Esq. (#309660)
9880 Research Drive, Suite 200
Irvine, CA 92618
Telephone: (949) 387-7200
Facsimile: (949) 387-6676
Email: James@jameshawkinsaplc.com
Email: Greg@jameshawkinsaplc.com
Email: Michael@jameshawkinsaplc.com
Email: Jeanne@jameshawkinsaplc.com

Attorneys for Plaintiff ANDREW D. TAPPIN,
individually and on behalf of all others similarly situated.

[Additional Counsel Listed On Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

ANDREW D. TAPPIN, DONYEISHA MISH,
DARNELL LEE, LUIS ROBLES, XOCHITL
VELASCO, and VICTOR GONZALEZ,
individually, and on behalf of all other similarly
situated,

Plaintiffs,

v.

TFORCE FREIGHT, INC., a Virginia
Corporation; and DOES 1 through 50, inclusive,
Defendants.

Case No. 34-2022-00314820-CU-OE-GDS

Assigned for All Purposes to:
Hon. Jill Talley
Dept. 27

DECLARATION OF VICTOR GONZALEZ
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT

1 **BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP**

2 Norman B. Blumenthal (State Bar #068687)

3 Kyle R. Nordrehaug (State Bar #205975)

4 Aparajit Bhowmik (State Bar #248066)

5 Nicholas J. De Blouw (State Bar #280922)

6 Jeffrey S. Herman (State Bar #280058)

7 Sergio Julian Puche (State Bar #289437)

8 Trevor G. Moran (State Bar #330394)

9 2255 Calle Clara

10 La Jolla, CA 92037

11 Telephone: (858)551-1223

12 Facsimile: (858) 551-1232

13 Website: www.bamlawca.com

14 Attorneys for Plaintiff VICTOR GONZALEZ

15 **MAKAREM & ASSOCIATES APLC**

16 Ronald W. Makarem, Esq. (SB#180442)

17 Samuel Almon, Esq. (SB #243569)

18 Daniel J. Bass, Esq. (SB#287466)

19 11601 Wilshire Boulevard, Suite 2440

20 Los Angeles, California 90025-1760

21 Telephone: (310) 312-0299;

22 Facsimile: (310) 312-0296

23 Attorneys for Plaintiffs DONYEISHA MISH,

24 DARNELL LEE, LUIS ROBLES, and

25 XOCHITL VELASCO

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1 I, Victor Gonzalez, declare as follows:

2 1. I am over the age of eighteen, a Plaintiff and a proposed Class Representative in the
3 above-entitled matter. I submit this declaration in support of the Motion for Preliminary Approval
4 of Class Settlement and Representative Action Settlement and in support of my application for an
5 Enhancement Award.

6 2. I have personal knowledge of all the facts stated herein. I could and would competently
7 testify under oath to these facts in court if requested to do so.

8 3. I am a former employee of TForce Freight, Inc. ("TForce"). I began working in California
9 for TForce in 2006 and worked for the company during the class period as a non-exempt employee.

10 4. I retained my attorneys who are experienced in both class action and PAGA
11 representative action litigation and claims against employers for violations of the California Labor
12 Code. I have no personal relationship or family ties to my attorneys or any officer of the Court. I
13 am not aware of having any actual or potential conflicts of interest with another class member in
14 this case nor am I aware of having any actual or potential conflicts of interest with CPT Group,
15 Inc., the settlement administrator. I am not aware of any other pending matter or action asserting
16 claims that will be extinguished or adversely affected by this settlement.

17 5. I decided to file this class action lawsuit and be a plaintiff/class representative because
18 I felt that my legal rights as an employee and others like me were violated. For example, I
19 regularly did not receive compliant meal and rest breaks which were often late, interrupted or
20 missed entirely. Also, I did not receive all the meal and rest break premium payments I was entitled
21 to when these violations occurred. Also, there were many times where I was interrupted during my
22 meal breaks and had to work while clocked out. I did not receive any minimum wages for this time
23 I spent working off the clock during my meal breaks. I also had to use my personal cell phone for
24 work-related purposes, such as communicating with my supervisors during work hours, but was
25 not reimbursed by TForce for any cell phone charges I incurred.

1 6. I spoke to my attorneys several times and discussed how TForce implemented its company
2 policies and procedures. I also assisted my attorneys in their investigation into my claims by
3 providing them documents and answering their questions. I reviewed the complaint before it was
4 filed and after it was filed I was given access to an electronic file sharing program that alerted me
5 via email when important documents were filed so that I could review them and keep up with the
6 developments in the case which I understood was one of my duties as a class representative. I
7 would also contact my attorneys from time to time if I had any questions about the case.
8

9 7. Even though this action is in the process of settling, I was and remain prepared to
10 perform all the duties of a class representative. I understand that as a class representative I have
11 assumed a fiduciary responsibility to prosecute this class action on behalf of the absent class
12 members. I have understood that as a fiduciary, I have a duty to prosecute this action for the
13 benefit of the class members and surrender any right to compromise the group action for an
14 individual gain.
15

16 8. I understood that being a plaintiff/class representative in this case meant that I was
17 seeking damages not only for myself but also other current and/or former non-exempt employees
18 working for TForce in California. I felt that these individuals were not aware of their labor law rights
19 and even if they were they would probably be apprehensive about speaking up or even simply
20 because of the time, effort and risk involved in filing a class action lawsuit.
21

22 9. I understood that being a part of this lawsuit involved risks. For example, my
23 attorneys explained to me that if the case went to trial and we lost, I could be held responsible to pay
24 for all or part of the attorney fees and costs paid by TForce to defend this lawsuit. Also, I know there
25 is a risk that potential future employers, if they ever find out about this lawsuit, could hold it against
26 me or downgrade me as a potential hire. As a Plaintiff in this case it would not be difficult for a
27 future employer to become aware that I sued an employer for labor law violations. Ultimately I
28 decided these risks were worth it and decided to fight for my rights and the rights of others regardless

of the risks, time and effort I spent on this case.

10. During the lawsuit I stayed in touch with my attorneys by phone and email. I also kept up to date on important developments by reviewing court filings that were made available to me electronically as I described above.

11. A mediation took place on May 17, 2022 with Michael Young, a well-respected and experienced mediator of wage and hour class actions. The case did not settle at the mediation on that day but the Parties continued to negotiate through the mediator for several months until they reached an agreement in principle to settle the action. I communicated with my attorneys regarding the terms of the settlement which was reached between the parties and understood that I was representing absent class members and therefore wanted the best possible result to be obtained for the class members and I believe a very positive result was in fact achieved via settlement.

12. I have been actively involved with this lawsuit performing the duties described above. Although I did not keep time records, I was in regular contact with my attorneys, reviewed court filings, and spent a significant amount of time on the issues presented during the lawsuit and in the settlement process. I estimate that I spent approximately 40-50 hours working on this case up until this point. I believe I have been diligent and have done what is expected of a named plaintiff and a proposed class representative to date, and will continue to do so. I have and always will maintain the best interest of the class members.

13. My attorneys explained to me that the settlement process involves a two-step review by the Court to determine whether the settlement is fair before approving the settlement. I know this process also involves notifying all class members of the settlement terms and of their rights to make a claim for their settlement share, to opt out of the settlement or to object to the settlement.

14. I believe I did the right thing by filing this case on behalf of the class members who, subject to court approval, are in line to receive monetary payments as a result of this case and settlement. This is money they may never have ever gotten if I did not pursue this action on their

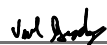
1 behalf. I feel significant personal satisfaction to know that I played a role in the class members
2 being entitled to monetary payments as a result of the filing of this lawsuit. I also believe that the
3 requested Enhancement Award of \$10,000 from the settlement is fair compensation for the work I
4 performed and the risks I undertook.

5 15. As part of the settlement it was necessary for me to sign a general release of claims I
6 may have against TForce. I believe the Enhancement Award I have requested provides me with
7 some compensation for this agreed release.
8

9 16. In light of all the time and effort I have spent on this case, the risk I undertook by
10 suing an employer, the exposure to being responsible for paying TForce's costs in the event we did
11 not win the case, the reputational risk that future employers may hold this lawsuit against me, the
12 general release, and in light of the size of the settlement, I believe the request for \$10,000 as an
13 Enhancement Award is fair and reasonable.

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct.

16 Executed on Mar 15, 2024, at Beaumont ca
17 (city, state)

18 
19 Victor Gonzalez (Mar 15, 2024 08:07 PDT)
20 Victor Gonzalez