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Attorneys for Plaintiffs KATHLEEN O'BRIEN, AURORA GALVAN, and CARA LISH
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA**

KATHLEEN O'BRIEN, AURORA
GALVAN, and CARA LISH individuals, on
behalf of themselves and on behalf of all
persons similarly situated,

Plaintiffs,

vs.

CERIDA INVESTMENT CORP., a
Corporation; DELOITTE CONSULTING
L.P., a Limited Partnership, and DOES 1 to
50, inclusive,

Defendants.

Case No. 21CV384527

Assigned to: Theodore C. Zayner
Dept.: 19

**DECLARATION OF JAMES R.
HAWKINS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND AWARD
OF ATTORNEYS' FEES, COSTS,
SERVICE AWARDS AND
ADMINISTRATION COSTS**

Date: December 11, 2024
Time: 1:30 p.m.

Complaint Filed: July 20, 2021
Trial: Not Set

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Attorneys for Plaintiffs
KATHLEEN O'BRIEN, AURORA GALVAN, and CARA LISH

1 I, James R. Hawkins, declare as follows:

2 1. I am an individual over the age of 18. I am a principal to the Law Firm of James
3 Hawkins, APLC. I am one of the attorneys of record for Plaintiffs and the Class. I have personal
4 knowledge of the facts set forth below, and if called to testify regarding them, I could and would do
5 so competently.

6 2. I submit this Declaration in support of Plaintiffs' Motion for Final Approval of Class
7 Action Settlement and Award of Attorneys' Fees, Costs, Service Awards, and Administration Costs
8 (the "Final Approval Motion").

9 3. I have no knowledge of the existence of any conflicting interests between my firm
10 and any of its attorneys, my co-counsel's firms or any of their attorneys, and Plaintiffs or any other
11 Class Member.

12 4. As more fully detailed in the accompanying declarations and attachments
13 concurrently submitted herewith, the Settlement is a fair, adequate, and reasonable compromise of
14 the claims at issue. I endorse the Settlement as it is in the best interests of Plaintiffs and the Class.

15 5. Final approval is appropriate since the Settlement will provide significant monetary
16 relief to the Settlement Class.

17 6. The Settlement was the product of extensive arm's length negotiations between
18 counsel. Though cordial and professional, the Settlement negotiations were adversarial and non-
19 collusive in nature. The Settlement reached is the product of substantial effort by the Parties and
20 their counsel. Although Plaintiffs and Class Counsel believed that they could certify the claims, they
21 recognized the potential risk, expense, and complexity posed by litigation, such as unfavorable
22 decisions on class certification, summary judgment, at trial and/or on the damages awarded, and/or
23 on an appeal that can take several more years to litigate. In addition, if Defendants prevailed on any
24 of their defenses, the Settlement Class Members may not have received any monetary recovery.

25 7. Based on our experience in other cases, including wage and hour matters, I believe
26 that I am qualified to evaluate the class claims and viability of defenses in this class action. In this
27 case, the recovery for each Settlement Class Member is reasonable, fair and adequate, and a
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1 settlement at this time is in the best interest of the Settlement Class. The Settlement provides each
2 Settlement Class Member with compensation for the alleged violations when viewed in relation to
3 the costs and risks inherent in obtaining class certification and proceeding to trial.

4 8. Plaintiffs' counsel fully endorse the terms and conditions of the Settlement as set
5 forth in the abovementioned Settlement Agreement.

6 9. Of course, the Settlement Amount represents a compromise figure, taking into
7 account the various risks surrounding class certification and the merits of Defendants' asserted
8 defenses. Nevertheless, the Settlement provides for fair and adequate payments to the Settlement
9 Class Members, with no reversion to Defendant.

10 10. For the foregoing reasons, it is respectfully requested that the Court grant Final
11 approval of the Settlement as being fair, reasonable, and in the best interests of the Settlement Class,
12 as well as grant final approval of the requested attorneys' fees and costs, and service awards to the
13 Class Representatives.

14 **Adequacy of Class Counsel**

15 11. I am an attorney at law licensed to practice before the Courts of the State of
16 California and before this Court.

17 12. In 1993, I graduated from the University of California, Los Angeles with a Bachelor
18 of Arts Degree. Following graduation, I attended Whittier Law School. In 1996, while a full-time
19 law student, I was also a full-time Judicial Extern for the Honorable Consuelo B. Marshall, United
20 States District Court, Central District. After approximately five months of service for Judge
21 Marshall, I became a full-time extern for the United States Attorney's Office, Central District of
22 California. My externship lasted for approximately five months. Thereafter, in 1997, I graduated
23 from Whittier Law School. The same year, I was admitted to practice law in the State of California.

24 13. From 1997-2007, I was a named partner at Hawkins & Sofonio, a law firm based out
25 of Irvine, California. At Hawkins & Sofonio, I pioneered the employment department litigating
26 plaintiff related employment issues such as: Wrongful Termination, Age Discrimination,
27 Disability, Wage and Hour and Sexual Harassment claims. Through the success and experience I
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1 obtained litigating employment related matters, I commenced the Wage and Hour division of our
2 employment department in 2002. Since then, I have spent the vast majority of my practice litigating
3 wage and hour class actions.

4 14. In 2007, I incorporated my wage and hour class action practice as James Hawkins
5 APLC. Since its inception, this law firm has been exclusively involved in class action and complex
6 litigation. In 2009, I opened an additional office in Miami, Florida, prosecuting wage and hour class
7 actions. I have been lead or co-lead counsel in all of the cases listed below.

8 15. I have a great deal of experience in wage and hour class action litigation. I have been
9 certified and approved as class counsel in many other wage/hour class actions, and I am currently
10 litigating numerous others before this Court and others. Although not an all-inclusive list, over the
11 years I have prosecuted the following class action matters as lead and/or co-lead counsel, all of which
12 implicated similar law and facts to those associated with this Action:

13 a. Mojica v. Compass Group, Inc., et. al. USDC Central District, Case No. 8:13-cv-
14 01754. Wage and Hour Class Action case seeking past wages for meal and rest
15 break violations for production workers in the State of California. Plaintiff's
16 Counsel preliminarily appointed as Class Counsel. Case settled. Final approval
17 granted, and funds fully disbursed.

18 b. Dao v. 3M Company, et al. USDC, CENTRAL DISTRICT, Case No. CV-08-04554.
19 Wage and Hour Class Action case seeking past wages for "off the clock", overtime
20 and meal and rest break violations for production workers in the State of
21 California. Plaintiff's Counsel appointed as Lead Counsel. Case settled, Final
22 Approval granted, no objections and funds fully distributed.

23 c. Ortiz v. Kmart, USDC, CENTRAL DISTRICT, Case No. SACV 06-638 ODW.
24 Wage and Hour Class Action case seeking past wages for meal and rest period
25 violations for retail employees in the State of California. Plaintiff's counsel
26 appointed co-lead counsel. Case settled, Final Approval granted, no objections and
27 funds fully distributed.

- d. **Morgan v. Aramark Campus, LLC, USDC, CENTRAL DISTRICT, Case No. SACV08-00412.** Wage and Hour Class Action case seeking past wages for meal and rest period violations for retail employees in the State of California. Plaintiff's Counsel appointed as Lead Counsel. Case settled, Final Approval granted, no objections and funds fully distributed.
- e. **West v Iron Mountain Information Management, Inc, et. al.; Los Angeles County Superior Court, Case No. BC393709.** Wage and Hour Class Action seeking past wages for overtime, meal and rest break violations for driver employees in the State of California. Stipulation for "binding arbitration." Arbitration Award for Plaintiff Class. Arbitration Award confirmed. Plaintiff's counsel lead trial counsel and class counsel.
- f. **Gonzalez v. Superior Industries International, Inc., et al., Los Angeles County Superior Court, Case No. BC 357912.** Wage and Hour Class Action seeking past wages for overtime, meal and rest breaks violations for production employees in the State of California. Plaintiff's counsel appointed as lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.
- g. **Acosta v. Fleetwood Travel Trailers of California, Inc., et al., Riverside County Superior Court, Case No. RIC 440630.** Wage and Hour Class Action seeking past wages for overtime, meal and rest break violations for production employees in the State of California. Plaintiff's counsel appointed as co-lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.
- h. **Walker v. Sharkeez, et al., Orange County Superior Court, Case No. 05CC00293.** Wage and Hour Class Action seeking past wages for unlawful deductions, meal and rest break violations for restaurant employees in the State of California. Plaintiff's counsel appointed as lead counsel. Case settled. Final Approval granted and funds fully distributed.

- i. **Padron v. Universal Protection Service, et al**, Orange County Superior Court, Case No. 05CC00013. Wage and Hour Class Action seeking past wages for overtime, meal and rest break violations for security officers in the State of California. Plaintiff's counsel appointed as co-lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.
- j. **Martinez v. Securitas Security Services USA, et al.**, Santa Clara Superior Court, Case No. 105-CV047499, et al. J.C.C.P. No. 4460. Wage and Hour Class Action seeking past wages for meal and rest break violations for security officers employed by defendant in the State of California. Plaintiff's counsel and co-counsel. Case settled, Final Approval granted and funds fully distributed.
- k. **Velasquez-Lopez v. Hotel Cleaning Services, Inc. et al.**, Riverside Superior Court, Case No. RIC 420909. Wage and Hour Class Action seeking past wages for overtime, meal and rest break violations for housekeepers employed by defendant in the State of California. Plaintiff's counsel appointed as lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.
- l. **Ruiz, et al. v. Unisourse Worldwide, Inc., et al.**, USDC, CENTRAL DISTRICT, Case No. CV09-05848. Wage and Hour Class Action seeking past wages for meal and rest period violations for non-exempt employees employed by defendant in the state of California. Case settled. Awaiting Preliminary Approval hearing. Plaintiff has petitioned the Court for Lead Counsel.
- m. **Herrador v. Culligan International Company, et al.**, USDC, CENTRAL DISTRICT, Case No. SACV 08-680. Wage and Hour Class Action seeking past wages for field and branch employees of defendant in the State of California. Plaintiff's counsel appointed as lead counsel. Case settled and awaiting Final Approval.
- n. **Defries v. Domain Restaurants, et al.**, Orange County Superior Court, Case No. 05CC00128. Wage and Hour Class Action seeking past wages for restaurant employees of defendant in the State of California. Plaintiff's counsel appointed as

1 lead counsel. Case settled, Final Approval granted, no objections and funds fully
2 distributed.

3 **o.** Denton v. BLB Enterprises, Inc., et al., Orange County Superior Court, Case No.
4 07CC01292. Wage and Hour Class Action seeking unpaid overtime, meal and rest
5 break violations for security guards employed by defendant in the State of
6 California. Plaintiff's counsel appointed as lead counsel. Case settled, Final
7 Approval granted, no objections and funds fully distributed.

8 **p.** Rios v. Sandberg Furniture Manufacturing Co., Inc, et al., Los Angeles Superior
9 Court, Case No. BC411477. Wage and Hour Class Action seeking unpaid meal
10 and rest break violations for production employees employed by defendant in the
11 State of California. Plaintiff counsel appointed as lead counsel. Case settled, Final
12 Approval granted, no objections and funds fully distributed.

13 **q.** McMurray v. Dave and Busters, Inc., et al., Orange County Superior Court, Case
14 No. 06CC00099. Wage and Hour Class Action seeking past wages for meal and
15 rest break violations for restaurant employees employed by defendant in the State
16 of California. Plaintiff's counsel appointed as co-lead counsel. Case settled, Final
17 Approval granted, no objections and funds fully distributed.

18 **r.** Osuna v. DFG Restaurants, Inc., et al., Los Angeles Superior Court, Case No. BC
19 330145. Wage and Hour Class Action seeking past wages of overtime for mis-
20 classification of managers employed by Defendant, DBA Carl's Jrs. in the State of
21 California. Plaintiff's counsel appointed as co-lead counsel. Case settled, Final
22 Approval granted, no objections and funds fully distributed.

23 **s.** Burns v. Gymboree Operations, Inc., et al., San Francisco Superior Court, Case No.
24 CGC-07-461612. Wage and Hour Class Action seeking past wages for meal and
25 rest break violations for retail employees employed by defendant in the State of
26 California. Plaintiff's counsel appointed lead counsel. Case settled, Final
27 Approval granted, no objections and funds fully distributed.

- t. Willems v. Diedrich Coffee, Inc., et al., Orange County Superior Court, Case No. 07CC00015. Wage and Hour Class Action seeking past wages of overtime for mis-classification of managers employed by Defendant in the State of California. Plaintiff's counsel appointed lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.
- u. Davila, et al. v. Beckman Coulter, Inc., et al., Orange County Superior Court, Case No. 07CC01347. Wage and Hour Class Action seeking past wages for overtime, meal and rest break violations for production workers employed by defendant in the State of California. Plaintiff's counsel appointed lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.
- v. Perez v. Naked Juice Company of Glendora, Inc., Los Angeles Superior Court, Case No. BC387088. Wage and Hour Class Action seeking past wages for overtime, meal and rest period violations for production employees employed by defendant in the State of California. Plaintiff counsel appointed as lead counsel. Case settled. Final Approval granted, no objections and funds fully distributed.
- w. Coordination Proceeding Special Title [Rule 1550(b)] Wackenhut Wage and Hour Cases, Los Angeles Superior Court, Case No. JCCP 4545. Wage and Hour Class Action seeking past wages for overtime, meal and rest period violations for security guards employed by defendant in the State of California. Certification granted. Plaintiff's counsel appointed as co-lead counsel. Writ taken. Court stays action pending Appellate Court ruling. Court lifts stay.
- x. Placencia v. Amcor Packaging Distribution, Inc., Orange County Superior Court, Case No. 30-2013-00694012-CU-OE-CXC. Wage and Hour Class Action seeking past wages for overtime, meal and rest period violations, and penalties on behalf of non-exempt production, maintenance, shipping, and receiving employees employed by Defendant in California. Plaintiff counsel appointed as lead counsel. Case settled. Final Approval granted, no objections and funds fully distributed.

1 **y. Trani v. Lisi Aerospace, et al.,** Los Angeles Superior Court, Case No. BC495527.

2 Wage and Hour Class Action seeking past wages for overtime, meal and rest period
3 violations, and penalties on behalf of non-exempt manufacturing employees
4 employed by Defendant in California. Plaintiff counsel appointed as lead counsel.
5 Case settled. Final Approval granted, no objections and funds fully distributed.

6 **z. Galvan v. Goodwin Co.,** Orange County Superior Court, Case No. 30-2013-

7 00637062-CU-OE-CXC, Wage and Hour Class Action seeking past wages for meal
8 period violations, and non-compliant wage statements on behalf of non-exempt
9 production employees employed by Defendant in California. Plaintiff counsel
10 appointed as lead counsel. Case settled. Final Approval granted, no objections and
11 funds fully distributed.

12 **aa. Reyes v. Bristol Fiberlite,** Orange County Superior Court, Case No. 30-2013-

13 00653425-CU-OE-CXC. Wage and Hour Class Action seeking past wages for
14 overtime, meal and rest period violations, inaccurate wage statements, and
15 penalties on behalf of non-exempt employees employed by Defendant in
16 California. Plaintiff counsel appointed as lead counsel. Case settled. Final
17 Approval granted, no objections and distribution of funds pending.

18 **bb. Gutierrez v. HMT Tank,** USDC Central Dist., Case No. CV14-1967-CAS(MANx).

19 Wage and Hour Class Action seeking past wages for meal and rest period
20 violations, failure to indemnify necessary expenses, inaccurate wage statements,
21 and penalties on behalf of non-exempt employees working in positions related to
22 servicing, refabricating and repairing storage tanks employed by Defendant in
23 California. Plaintiff counsel appointed as lead counsel. Case settled. Final
24 Approval granted, no objections and funds fully distributed.

25 **cc. Williams v. Il Fornaio America Corp.,** Sacramento County, Case No. 34-2011-

26 0009616. Wage and Hour Class Action seeking past wages for overtime, meal and
27 rest period violations, reimbursements, and penalties on behalf of non-exempt
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1 restaurant employees employed by Defendant in California. Plaintiff counsel
2 appointed as lead counsel. Case settled. Final Approval granted, and funds fully
3 distributed.

4 **dd.** Aguilar v. 7-Eleven, Inc., Orange County, Case No. 30-2009-002687141-CU-OE-
5 CXC. Wage and Hour Class Action seeking past wages for overtime, meal and rest
6 period violations, and penalties on behalf of non-exempt retail clerks employed by
7 Defendant in California. Plaintiff counsel appointed as lead counsel. Case settled.
8 Final Approval granted, no objections and funds fully distributed.

9 **ee.** Madrigal v. Huntington Beach Market Broiler, Inc., Orange County, Case No. 30-
10 2012-00611260. Wage and Hour Class Action seeking past wages for overtime,
11 meal and rest period violations, reimbursements, and penalties on behalf of non-
12 exempt employees employed by Defendant in California. Plaintiff counsel
13 appointed as lead counsel. Case settled. Final Approval granted, no objections and
14 funds fully distributed.

15 **ff.** Vang v. Jazz Semiconductor, Inc., Orange County, Case no. 30-2011-00460278.
16 Wage and Hour Class Action seeking past wages for overtime, meal and rest period
17 violations, reimbursements, and penalties on behalf of non-exempt production
18 workers employed by Defendant in California. Plaintiff counsel appointed as lead
19 counsel. Case settled. Final Approval granted, no objections and funds fully
20 distributed.

21 **gg.** Cano v. Financial Statement Services, Inc., Orange County, Case No. 30-2013-
22 00653349-CU-OE-CXC.

23 **hh.** Gonzalez v. Quality Aluminum Force, LLC, Orange County, Case No. 30-2015-
24 00817941-CU-OE-CXC.

25 **ii.** Smith v. Space Exploration Technologies Corp., Los Angeles County Case No.
26 BC554258.

1 **jj.** Madrigal v. Balda C Brewer, Inc., Orange County Case No. 30-2015-00820218-
2 CU-OE-CXC.

3 **kk.** Mendez v. Liberty Glass Fabricators, Inc., Riverside County Case No. RIC
4 1800119.

5 **ll.** Attia v. Neiman Marcus Group, Inc., United States District Court for the Central
6 District of California Case No. 8:16-cv-001504-DOC-FFM

7 **mm.** Vigueras v. Red Robin, United States District Court for the Central District of
8 California Case No. 8:17-cv-1422-JVS-DFM.

9 **nn.** Payne v. Marriott Ownership Resorts, Inc., San Diego County Case No. 37-2018-
10 00015175-CU-OE-CTL.

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12 16. In sum, my firm has been lead or co-lead counsel in hundreds of cases since its
13 inception. We have recovered hundreds of millions of dollars for employees in the State of
14 California and millions for the State as well through PAGA.

15 17. Our firm has served as class counsel in a number of significant wage and hour
16 settlements. Of particular note, in 2019, our firm was co-lead counsel in securing the largest wage
17 and hour class action settlement in California history at \$130,000,000. During this case, plaintiffs
18 appealed a decertification order. This case involved several appeals. The appellate record
19 amassed an extensive appellate record comprising a 23-volume joint appendix, a three-volume
20 reporters transcript, five briefs, four letter briefs, two motions for judicial notice, a motion to
21 augment the record, and several additional letters informing the appellate court of new legal
22 authority issued after Dukes. The matter was argued to and submitted by the Court of Appeal on
23 September 15, 2016, and on November 21, 2016, the decertification order was reversed and the
24 case was remanded for further proceedings. (Lubin v. The Wackenhut Corporation (“Lubin”), 5
25 Cal. App. 5th 960 (2016)). Wackenhut filed a petition for review of the Court of Appeal decision
26 to the California Supreme Court. The Supreme Court denied Wackenhut’s petition for review of
27 Lubin. The Court of Appeal issued remittitur on April 10, 2017. Eventually through more
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1 litigation, the parties were able to secure the \$130 million settlement that was approved on
2 October 21, 2019 by Judge Highberger in the Los Angeles Superior Court.

3 18. Additionally, in early 2020, our firm served as lead counsel in a class action jury
4 trial in the Central District of California involving the class and PAGA representative claims of
5 over 23,000 employees which successfully resolved in the midst of trial for \$8,500,000.

6 19. Even more recently, our office filed an appeal in the 9th circuit in *Valiente, et. al.*
7 *vs. Swift Transportation Co. of Arizona*, Case No. 21-55456, challenging the retroactive
8 application of The Motor Vehicle Safety Act, 49 U.S.C. § 31141 preemption of California meal
9 and rest periods laws as applied to commercial drivers.

10 20. As demonstrated by our track record, our firm will aggressively litigate when
11 necessary. We have also settled many high-stakes class and representative actions. Hawkins'
12 settlements have directly compensated hundreds of thousands of California workers and
13 consumers. Hawkins' actions have also forced employers to modify their policies for the benefit
14 of employees including changing the compensation structure for certain employees and changing
15 practices to ensure that workers will be able to take timely rest and meal breaks.

16 21. Based on our experience, demonstrated competence, resources to prosecute the
17 claims at issue and reputation among our colleagues in the both the defense and plaintiffs' bar, I
18 respectfully submit our firm's experience in the field of wage and hour cases provides us the
19 ability to prosecute claims swiftly and often times without the need for protracted litigation.
20 Although, as demonstrated in the *Wackenhut* cases, we do not give up fighting for class members
21 when challenged and necessary.

22 **Attorney's Fees and Costs**

23 22. To date, my firm has expended approximately 87.9 hours and \$4,278.92 in costs in
24 litigating this matter. At Class Counsel's hourly rates, this results in a total lodestar amount of
25 \$67,772.50. Here, the Parties' agreement to pay Plaintiff's Counsel fees of up to \$312,870.56 (or
26 approximately 1/3 of the Gross Settlement Amount) is reasonable. Our efforts in this action and in
27 the related action, include extensive investigation and document review in connection with the
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1 filing of the complaint; drafting the complaint; drafting stipulations; day to day correspondence
2 and case management in the related action; drafting pleadings; reviewing the settlement
3 agreement; reviewing/revising the preliminary approval motion and related documents; reviewing
4 relevant documentation regarding the claims and defense; preparing the declaration in support of
5 the motion for preliminary approval; reviewing the preliminary approval motion and related
6 documents; correspondence re with administrator; reviewing the final approval motion and related
7 documents; and preparing the declaration in support of the motion for final approval. I believe
8 James Hawkins, APLC's hourly rates are in line with, and, in fact are modest compared with the
9 hourly rates of other counsel in similar actions.

10 23. I am the founding partner at James Hawkins, APLC and have devoted
11 approximately 29.7 hours in prosecuting this case on behalf of Plaintiff and the Class. In 1993, I
12 graduated from the University of California, Los Angeles with a Bachelor of Arts Degree.
13 Following graduation, I attended Whittier Law School. In 1996, while a full-time law student, I
14 was also a full-time Judicial Extern for the Honorable Consuelo B. Marshall, United States
15 District Court, Central District. After approximately five months of service for Judge Marshall, I
16 became a full-time extern for the United States Attorney's Office, Central District of California.
17 My externship lasted for approximately five months. Thereafter, in 1997, I graduated from
18 Whittier Law School. The same year, I was admitted to practice law in the State of California.
19 Since its inception, this law firm has been exclusively involved in class action and complex
20 litigation. In 2009, I opened an additional office in Miami, Florida, prosecuting wage and hour
21 class actions. Since 2002, I have been lead counsel or co-lead counsel in hundreds of wage and
22 hour class actions. My hourly rate is \$1,050.00 per hour. I have expended 29.7 hours in litigating
23 this case. The following is a summary of my tasks and activities in prosecuting this matter: due
24 diligence, investigation, intake, conferences with clients and witnesses, reviewing documents,
25 research in support of claims, reviewing and revising pleadings, conferences with counsel for
26 related parties, reviewing settlement documentation and approval motion, and conferences
27 regarding strategy and status. The number of hours I have expended for work performed and the
28 corresponding attorney's fees of approximately \$36,750.00 are reasonable and necessary.

1 24. Christina Lucio is Of Counsel to James Hawkins, APLC and has been the lead day
2 to day attorney on this case. She has devoted in excess of 30.1 hours in prosecuting the Action.
3 Such hours were reasonable and necessary. Ms. Lucio has 17 years of experience and primarily
4 handled the day-to-day litigation of this matter during the action. Ms. Lucio graduated from the
5 University of California, Riverside in 2003 and received her law degree from the University of
6 Southern California in 2007. She has been a member of the State Bar of California since 2007.
7 Her practice focuses primarily on employment law including wrongful termination,
8 discrimination, retaliation, wage and hour violations (individual and class action), and sexual
9 harassment claims. In recent years, a substantial part of her practice has been focused on class
10 actions, including wage and hour litigation. Ms. Lucio's hourly rate is currently \$775 per hour.
11 The following is a summary of Ms. Lucio's tasks and activities in prosecuting this matter: day to
12 day case management, investigation, conferences with client and witnesses, reviewing documents
13 and compiling documentation in support of claims, research in support of claims and relating to
14 defenses, drafting complaint, reviewing and revising pleadings, drafting PAGA notices,
15 conferences with co-counsel and defense counsel, drafting stipulations and case management
16 statements, reviewing and revising opposition to motion in abatement, reviewing settlement
17 documentation and approval motion, monitoring the settlement process and administration,
18 correspondence with administrator, case management conferences and other proceedings, and
19 conferences regarding strategy and status. The number of hours Ms. Lucio expended for work
20 performed and the corresponding attorney's fees of \$23,357.60 reasonable and necessary.

21 25. Our associate attorney, Danielle Piskor, has dedicated in excess of 8.3 hours in
22 prosecuting this action on behalf of Plaintiffs and the class. Our associates' hourly rates are
23 \$450.00 per hour. Ms. Piskor was admitted to the bar in August of 2021. The following is a
24 summary of our associates' tasks and activities in prosecuting this matter: drafting CMC
25 statements, correspondence and conferences with co-counsel and defense counsel, correspondence
26 with client, drafting opposition to motion in abatement, research in support, and attending
27 conferences. The number of hours expended by our associates for work performed and the
28 corresponding attorney's fees of \$3,735.00 are reasonable and necessary.

26. Our paralegals (Melissa Whitson, Michael Cipriano, Camille Baylis and Brandon Sumrow) have dedicated over 19.8 hours in assisting with the prosecution of this case. Their hourly rate is \$200.00 per hour. The number of hours expended for work performed and the corresponding fees of \$3,960.00 are reasonable and necessary.

27. The lodestar for James Hawkins APLC is approximately \$67,772.50. I submit that the requested attorneys' fees of one-third the Maximum Settlement Amount that Class Counsel has obtained on behalf of the Class Members is fair and reasonable, as are the hourly rates at which our attorneys bill.

James Hawkins APLC Lodestar Summary

Timekeeper	Years	Hours	Rate	Total
James Hawkins, Esq.	26	29.7	\$1050	\$36,750.00
Christina Lucio	17	30.1	\$775	\$23,327.50
Danielle Piskor	2	8.3	\$450	\$3,735.00
Paralegal Staff		19.8	\$200	\$3,960.00
TOTALS		87.9		\$67,772.50

28. We respectfully submit that our hourly rates are reasonable in light of the hourly rates charged in the marketplace for comparable skill, years of experience and services. A true and correct copy of the 2021 Wolters Kluwer Real Rate Report, attached as **Exhibit 1**, and the Laffey Matrix, attached as **Exhibit 2**. I believe James Hawkins, APLC's hourly rates are in line with, and, in fact are modest compared with the hourly rates of other counsel in similar actions.

29. As set forth in my co-counsel's declaration, the Settlement achieved is a fair, reasonable, and adequate resolution of the Action in light of the claims and defenses at issue.

30. The Settlement that Counsel has negotiated on behalf of the Class confronts very difficult and potentially individualized issues which make trial on the merits challenging. I and our firm's attorneys and paralegals, along with co-counsel, have secured this Settlement through persistent advocacy of the claims, which has applied legal nuances and negotiation techniques to achieve a very favorable result under the circumstances. Other attorneys without our experience and comprehensive knowledge and perspective in connection with complex employment litigation may not have been able to achieve such superior settlement terms on behalf of the Class. I believe the requested amount of attorneys' fees under the Settlement is a reasonable allocation given the

1 excellent result we have achieved. I, therefore, respectfully request the Court approve the
2 allocated attorneys' fees under the Parties' Settlement.

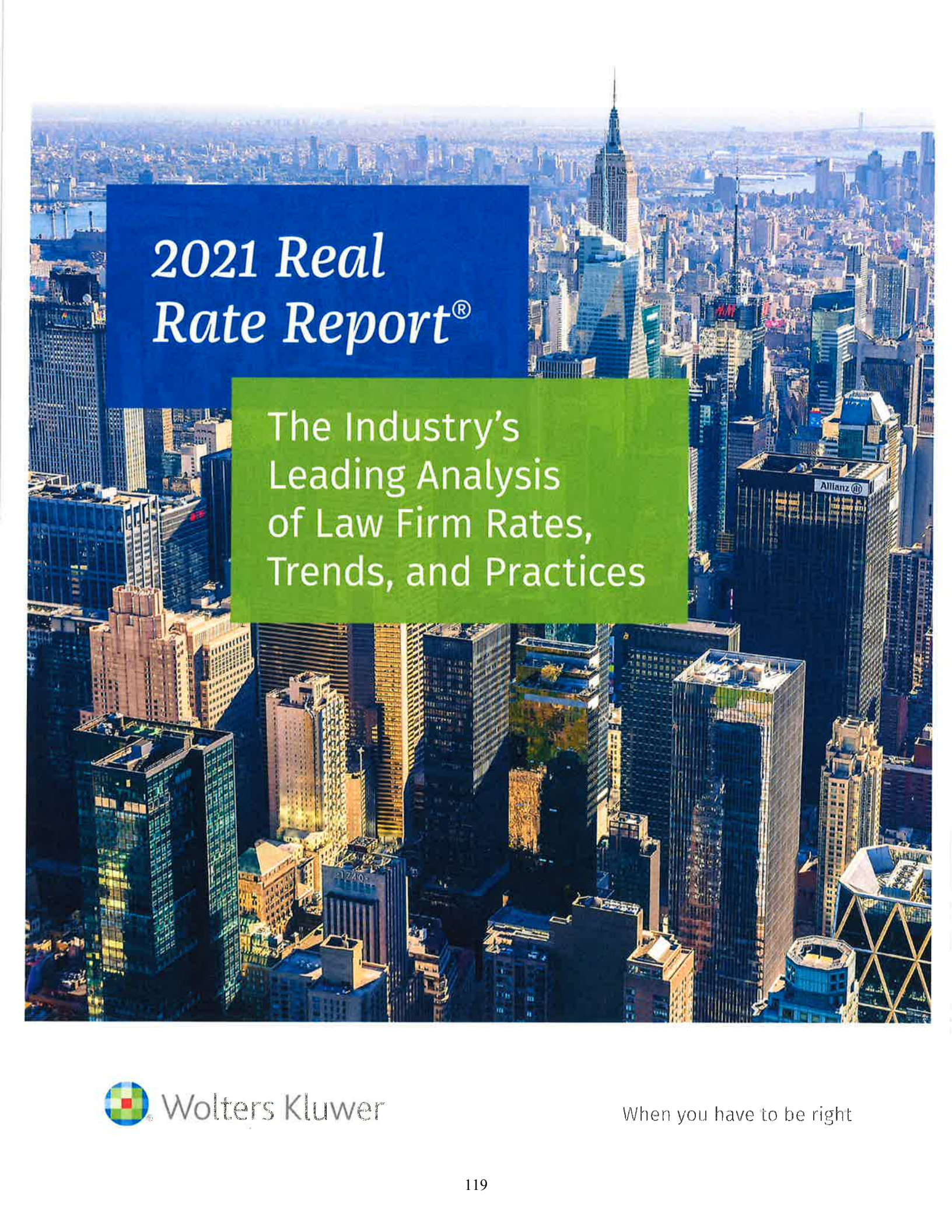
3 31. In serving as Class Counsel in this action and the related actions which ultimately
4 led to the Settlement, my firm will also seek reimbursement for the out-of-pocket costs of
5 \$4,278.932. This does not include the costs incurred by our co-counsel. A summary of the costs
6 incurred by our firm to date in this action is attached herewith as **Exhibit 3**. I believe that all of
7 these fees and costs are reasonable and necessarily incurred in litigating this matter and in pursuit
8 of the settlement.

9 I declare under penalty of perjury under the laws of the State of California and the United
10 States of America that the foregoing is true and correct.

11 Executed on this 14th day of November, 2024 at Irvine, California.

12 
13 _____
14 James R. Hawkins, Esq.

EXHIBIT 1

An aerial photograph of the New York City skyline, featuring numerous skyscrapers and the Empire State Building prominently in the background. The image is used as a background for the report cover.

2021 Real Rate Report[®]

The Industry's
Leading Analysis
of Law Firm Rates,
Trends, and Practices



Wolters Kluwer

When you have to be right

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A Letter to Our Readers

Welcome to the Wolters Kluwer's ELM Solutions Real Rate Report®, the industry's leading data-driven benchmark report for lawyer rates.

Our Real Rate Report has been a relied upon data analytics resource to the legal industry since its inception in 2010 and continues to evolve. The Real Rate Report is powered by Wolters Kluwer's ELM Solutions LegalVIEW® data warehouse, the world's largest source of legal performance benchmark data, which has grown to include over \$150 billion in anonymized legal data.

This year, we launched our LegalVIEW Insights Report series, which explores the emerging trends behind the overall legal spend volatility seen in corporate legal departments. The insights reports coupled with the Real Rate Report are great tools to drive actionable decisions.

The legal services industry relies on internal analytics and the use of external data resources, such as the LegalVIEW® data warehouse, to support legal management strategies. The depth and details of the data in the Real Rate Report enable you to better benchmark and make more informed investment and resourcing decisions for your organization.

As with past Real Rate Reports, all of the data analyzed are from corporations' and law firms' e-billing and time management solutions. We have included lawyer and paralegal rate data filtered by specific practice and sub-practice areas, metropolitan areas, and types of matters to give legal departments and law firms greater ability to pinpoint areas of opportunity. We strive to make the Real Rate Report a valuable and actionable reference tool for legal departments and law firms.

As always, we welcome your comments and suggestions on what information would make this publication more valuable to you. We thank our data contributors for participating in this program. And we thank you for making Wolters Kluwer's ELM Solutions your trusted partner for legal industry domain expertise, data, and analytics and look forward to continuing to provide market-leading, expert solutions that deliver the best business outcomes for collaboration among legal departments and law firms.

Sincerely,



Barry Ader

Vice President, Product Management and Marketing
Wolters Kluwer's ELM Solutions

Report Use Considerations

2021 Real Rate Report

- Examines law firm rates over time
- Identifies rates by location, experience, firm size, areas of expertise, industry, and timekeeper role (i.e., partner, associate, and paralegal)
- Itemizes variables that drive rates up or down

All the analyses included in the report derive from the actual rates charged by law firm professionals as recorded on invoices submitted and approved for payment.

Examining real, approved rate information, along with the ranges of those rates and their changes over time, highlights the role these variables play in driving aggregate legal cost and income. The analyses can energize questions for both corporate clients and law firm principals.

Clients might ask whether they are paying the right amount for different types of legal services, while law firm principals might ask whether they are charging the right amount for legal services and whether to modify their pricing approach.

Some key factors¹ that drive rates²:

Attorney location - Lawyers in urban and major metropolitan areas tend to charge more when compared with lawyers in rural areas or small towns.

Litigation complexity - The cost of representation will be higher if the case is particularly complex or time-consuming; for example, if there are a large number of documents to review, many witnesses to depose, and numerous procedural steps, the case is likely to cost more (regardless of other factors like the lawyer's level of experience).

Years of experience and reputation - A more experienced, higher-profile lawyer is often going to charge more, but absorbing this higher cost at the outset may make more sense than hiring a less expensive lawyer who will likely take time and billable hours to come up to speed on unfamiliar legal and procedural issues.

Overhead - The costs associated with the firm's support network (paralegals, clerks, and assistants), document preparation, consultants, research, and other expenses.

Firm size - The rates can increase if the firm is large and has various timekeeper roles at the firm. For example, the cost to work with an associate or partner at a larger firm will be higher compared to a firm that has one to two associates and a paralegal.

Rates increase in geographic areas with growing population

Additional analysis was performed to examine the impact of geographic location on law firm hourly rates. This report, like previous ones, shows that large, cosmopolitan legal services markets like New York City, San Francisco, and Los Angeles are associated with higher hourly rates. In addition, our analysis reveals a significant spike in hourly rates in areas of the country

¹ David Goguen, J.D., University of San Francisco School of Law (2020) Guide to Legal Services Billing Retrieved from: <https://www.lawyers.com/legal-info/research/guide-to-legal-services-billing-rates.html>

² Source: 2018 RRR. Factor order validated in multiple analyses since 2010

Report Use Considerations

that are currently experiencing high population growth. Significant average rate increases occurred from 2020 to 2021 in many areas, but especially Fresno, California (~15% average rate increase), Greenville, SC (~18%), Miami, FL (~9%), Nashville, TN (~11%), Oklahoma City (~13%), Phoenix, AZ (~10%), and Seattle, WA (~11%) -- all of which have experienced much higher than average population growth in recent years.

The correlation between hourly rates and population growth makes sense. When people and businesses move into an area, it creates a spike in demand for all sorts of goods and services, including legal services. However, it is hard for the supply of legal services to move as quickly as demand because attorneys looking to move into a new geographic area face high switching costs that most will refuse to pay unless they absolutely have to.

First, attorneys looking to take work in a new state have to get licensed there, which takes time and effort and is a distraction that can reduce their current income in the form of the number of hours they are able to bill to clients. Second, despite the rise in remote working, many attorneys looking to establish practices in a new geographic location may have to establish at least some physical presence there, find a new office, new lodging, and potentially uproot their entire family. Third, even if the switching costs of licensure, physically moving, etc. are paid, attorneys may fear yet another switching cost in the form of attrition of their existing clients from their original geographic locale, who may view them as no longer investing in their knowledge of the legal problems and legal solutions that are specific to the original locale.

³ Source: 2020 RRR. Factor order validated in multiple analyses since 2010

Section I: High-Level Data Cuts

Cities

By Matter Type

2021 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2021	2020	2019
Kansas City MO	Non-Litigation	Associate	95	\$250	\$320	\$385	\$323	\$288	\$278
		Partner	14	\$285	\$350	\$484	\$402	\$445	\$413
Las Vegas NV	Non-Litigation	Partner	19	\$250	\$300	\$445	\$375	\$421	\$480
		Associate	12	\$238	\$323	\$377	\$320	\$282	\$280
Little Rock AR	Non-Litigation	Partner	12	\$215	\$215	\$300	\$267	\$290	\$274
Los Angeles CA	Litigation	Partner	342	\$475	\$715	\$1,042	\$759	\$708	\$694
		Associate	433	\$402	\$602	\$806	\$610	\$583	\$535
Los Angeles CA	Non-Litigation	Partner	559	\$600	\$880	\$1,160	\$894	\$872	\$816
		Associate	761	\$480	\$685	\$895	\$696	\$665	\$620
Louisville KY	Litigation	Partner	18	\$265	\$356	\$405	\$344	\$353	\$338
		Associate	16	\$178	\$200	\$278	\$225	\$227	\$214
Louisville KY	Non-Litigation	Associate	12	\$208	\$215	\$249	\$224	\$230	\$197
		Partner	15	\$244	\$389	\$529	\$421	\$424	\$430
Madison WI	Non-Litigation	Partner	15	\$244	\$389	\$529	\$421	\$424	\$430
Memphis TN	Litigation	Partner	16	\$290	\$415	\$425	\$364	\$355	\$347
		Associate	20	\$298	\$340	\$369	\$345	\$346	\$334
Miami FL	Litigation	Partner	100	\$282	\$475	\$614	\$465	\$473	\$453
		Associate	100	\$282	\$475	\$614	\$465	\$473	\$453

Section I: High-Level Data Cuts

Cities

By Years of Experience

2021 - Real Rates for Associate

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2021	2020	2019
Jackson MS	7 or More Years	22	\$55	\$55	\$183	\$124	\$125	\$183
Kansas City MO	3 to Fewer Than 7 Years	26	\$252	\$310	\$349	\$306	\$294	\$292
	7 or More Years	28	\$295	\$325	\$370	\$325	\$283	\$282
Los Angeles CA	Fewer Than 3 Years	70	\$494	\$533	\$622	\$543	\$511	\$413
	3 to Fewer Than 7 Years	128	\$533	\$709	\$821	\$673	\$582	\$510
	7 or More Years	164	\$412	\$565	\$841	\$629	\$604	\$576
Miami FL	3 to Fewer Than 7 Years	14	\$277	\$340	\$408	\$364	\$323	\$323
	7 or More Years	30	\$310	\$475	\$540	\$431	\$429	\$374
Minneapolis MN	3 to Fewer Than 7 Years	23	\$330	\$351	\$462	\$394	\$388	\$355
	7 or More Years	26	\$326	\$448	\$580	\$441	\$397	\$384
Nashville TN	7 or More Years	13	\$245	\$283	\$325	\$287	\$271	\$253
New Orleans LA	3 to Fewer Than 7 Years	13	\$235	\$238	\$280	\$251	\$260	\$248
	7 or More Years	13	\$260	\$340	\$364	\$324	\$326	\$276
New York NY	Fewer Than 3 Years	160	\$440	\$590	\$775	\$629	\$560	\$513
	3 to Fewer Than 7 Years	237	\$412	\$670	\$875	\$681	\$625	\$559

Section I: High-Level Data Cuts

Cities

By Years of Experience

2021 - Real Rates for Partner

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2021	2020	2019
Los Angeles CA	Fewer Than 21 Years	173	\$550	\$855	\$1,065	\$815	\$724	\$703
	21 or More Years	332	\$527	\$725	\$1,145	\$844	\$818	\$758
Memphis TN	Fewer Than 21 Years	11	\$283	\$300	\$340	\$317	\$324	\$309
	21 or More Years	17	\$365	\$415	\$425	\$391	\$379	\$370
Miami FL	Fewer Than 21 Years	44	\$408	\$540	\$583	\$503	\$484	\$485
	21 or More Years	99	\$414	\$550	\$750	\$569	\$564	\$532
Milwaukee WI	Fewer Than 21 Years	14	\$306	\$358	\$433	\$373	\$355	\$323
	21 or More Years	26	\$375	\$470	\$545	\$535	\$530	\$431
Minneapolis MN	Fewer Than 21 Years	41	\$400	\$520	\$604	\$513	\$515	\$478
	21 or More Years	82	\$450	\$659	\$789	\$619	\$591	\$579
Nashville TN	Fewer Than 21 Years	27	\$375	\$464	\$495	\$436	\$413	\$374
	21 or More Years	49	\$420	\$470	\$536	\$481	\$472	\$433
New Orleans LA	Fewer Than 21 Years	24	\$275	\$305	\$390	\$346	\$361	\$337
	21 or More Years	40	\$295	\$332	\$412	\$352	\$373	\$369
New York NY	Fewer Than 21 Years	456	\$656	\$1,044	\$1,407	\$1,033	\$987	\$938

Section I: High-Level Data Cuts

Cities

By Role

2021 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Role	n	First Quartile	Median	Third Quartile	2021	2020	2019
Little Rock AR	Partner	16	\$215	\$250	\$300	\$272	\$287	\$282
Los Angeles CA	Partner	786	\$536	\$822	\$1,101	\$843	\$808	\$766
	Associate	1,110	\$450	\$653	\$860	\$664	\$636	\$587
Louisville KY	Partner	25	\$278	\$355	\$400	\$348	\$363	\$348
	Associate	25	\$180	\$210	\$264	\$224	\$228	\$210
Madison WI	Partner	15	\$241	\$389	\$536	\$419	\$435	\$440
Memphis TN	Partner	30	\$290	\$351	\$415	\$354	\$351	\$342
Miami FL	Partner	226	\$360	\$530	\$675	\$525	\$524	\$516
	Associate	149	\$265	\$361	\$475	\$375	\$381	\$365
Milwaukee WI	Partner	52	\$316	\$390	\$476	\$452	\$450	\$387
	Associate	36	\$270	\$305	\$358	\$316	\$305	\$269
Minneapolis MN	Partner	175	\$419	\$595	\$711	\$578	\$544	\$531
	Associate	137	\$295	\$406	\$521	\$405	\$377	\$376
Nashville TN	Partner	108	\$375	\$468	\$535	\$463	\$457	\$414
	Associate	73	\$252	\$311	\$338	\$305	\$283	\$257

EXHIBIT 2

LAFFEY MATRIX

[History](#)
[Case Law](#)
[See the Matrix](#)
[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)

* $\frac{1}{2}$ Years Out of Law School $\frac{1}{2}$ is calculated from June 1 of each year, when most law students graduate. $\frac{1}{2}$ 1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $\frac{1}{2}$ 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 $\frac{1}{2}$ 1-3" from June 1, 1996 until May 31, 1999, would move into tier $\frac{1}{2}$ 4-7" on June 1, 1999, and tier $\frac{1}{2}$ 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.

EXHIBIT 3

Matter Billing Detail

Report Date:11/13/2024

Report Time:11:51AM

Page:1 of 2

User ID:R. Hawkins

JAMES HAWKINS APLC

Date Range:01/01/1900 to 11/13/2024

Client:CERIDA002 - Cara Lish

Matter:CERIDA001 - Cerida Investment Corp dba AnswerNet- Cara Lish v. Cerida Investment

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
02/22/2022	FIL	Filing Fee - LWDA filing fee	\$75.00		Unbilled				
02/22/2022	POS	Postage - LWDA Cert mail	\$18.32		Unbilled				
02/22/2022	FST	First Legal Network - Filing fax/pdf same day, Class complaint and initial docs IN#30192286	\$1,658.20		Unbilled				
04/22/2022	FST	First Legal Network - Process Serve - Complaint, Initial Docs, Notice, Minute Orders IN# 30195930	\$196.70		Unbilled				
08/05/2022	FST	First Legal Network- Filing-Fax: Stip, POS IN#30209403	\$76.50		Unbilled				
09/06/2022	FST	First Legal Network - Filing-Fax: Stip to Vacate All Hearing and Dead IN#30212421	\$76.50		Unbilled				
09/23/2022	CRT	Court Documents- 9.20.22 Stip to Vacate All Hearings, Order	\$5.40		Unbilled				
02/06/2023	FST	First Legal Network - Filing - Dismissal, Decl, Prop Order, POS IN# 30230586	\$141.60		Unbilled				
		Total:	\$2,248.22	\$0.00					
		Balance:	\$2,248.22						

Matter Billing Detail

JAMES HAWKINS APLC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Total Fees Billed- - - - -			\$0.00						
Total Fees Unbilled : - - - - -			\$0.00						
Total Fees Received : - - - - -			\$0.00						
Total Soft Cost Billed : - - - - -			\$0.00						
Total Soft Cost Unbilled : - - - - -			\$0.00						
Total Soft Cost Received : - - - - -			\$0.00						
Total Hard Cost Billed : - - - - -			\$0.00						
Total Hard Cost Unbilled : - - - - -			\$2,248.22						
Total Hard Cost Received : - - - - -			\$0.00						
Total Taxes Billed : - - - - -			\$0.00						
Total Taxes Unbilled : - - - - -			\$0.00						
Total Taxes Received : - - - - -			\$0.00						
Total Late Charges Billed : - - - - -			\$0.00						
Total Late Charges Unbilled: - - - - -			\$0.00						
Total Late Charges Received : - - - - -			\$0.00						
Trust Balance: - - - - -			\$0.00						

Matter Billing Detail

Report Date: 11/13/2024
Report Time: 11:52AM
Page: 1 of 2
User ID: R. Hawkins

JAMES HAWKINS APLC

Date Range: 01/01/1900 to 11/13/2024
Client: CERIDA002 - Cara Lish
Matter: CERIDAPAGA01 - Cerida Investment Corp dba AnswerNet- PAGA-Cara Lish v. Cerida

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
04/29/2022	FST	First Legal Network- Filed PAGA Complaint and Initial docs IN 30199329	\$1,701.60		Unbilled				
05/25/2022	CRT	Court Documents - 05.25.22 Notice	\$2.00		Unbilled				
06/15/2022	FST	First Legal Network - Filing-FAX: NAR IN#30202789	\$54.50		Unbilled				
08/10/2022	FST	First Legal Network- Filing-FAX: Plt Ntc of CMC and Orders re Complex IN#30209403	\$54.50		Unbilled				
09/06/2022	FST	First Legal Network - Filing-Fax: Stip to Vacate All Hearing and Dead IN#30212421	\$76.50		Unbilled				
02/06/2023	FST	First Legal Network - Filing - Dismissal, Decl, Prop Order, POS IN# 30230586	\$141.60		Unbilled				
		Total:	\$2,030.70	\$0.00					
		Balance:	\$2,030.70						

Matter Billing Detail

JAMES HAWKINS APLC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Total Fees Billed- - - - -			\$0.00						
Total Fees Unbilled : - - - - -			\$0.00						
Total Fees Received : - - - - -			\$0.00						
Total Soft Cost Billed : - - - - -			\$0.00						
Total Soft Cost Unbilled : - - - - -			\$0.00						
Total Soft Cost Received : - - - - -			\$0.00						
Total Hard Cost Billed : - - - - -			\$0.00						
Total Hard Cost Unbilled : - - - - -			\$2,030.70						
Total Hard Cost Received : - - - - -			\$0.00						
Total Taxes Billed : - - - - -			\$0.00						
Total Taxes Unbilled : - - - - -			\$0.00						
Total Taxes Received : - - - - -			\$0.00						
Total Late Charges Billed : - - - - -			\$0.00						
Total Late Charges Unbilled: - - - - -			\$0.00						
Total Late Charges Received : - - - - -			\$0.00						
Trust Balance: - - - - -			\$0.00						