

Misty M. Lauby, Esq. [CSB No. 243009]
misty@lmlfirm.com
LAUBY, MANKIN & LAUBY LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiff and others similarly situated

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KEITH GUTHRIE, individually, on a
representative basis, and on behalf of
all others similarly situated;

Plaintiff,

vs.

ITS LOGISTICS, LLC, a Delaware
Company, and DOES 1 through 20,
inclusive;

Defendants.

Case No.: 1:21-CV-00729-KES-EPG

**DECLARATION OF MISTY M.
LAUBY IN SUPPORT OF
MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing

Date: April 21, 2025

Time: 1:30 p.m.

Courtroom: 6

Complaint filed: March 9, 2021

I, Misty M. Lauby, state and declare:

1. I am an attorney licensed to practice before all of the courts of the State of California and the United States District Court Eastern District of California. I am a partner at Lauby, Mankin & Lauby LLP. I represent the Plaintiff in this action and I am thoroughly familiar with and have personal knowledge of all of the facts set forth herein. I handled the day-to-day litigation in this matter. I submit this declaration in support of Plaintiff's Motion for Final Approval of Class Action Settlement. If called as a witness, I could and would competently testify thereto.

DECLARATION OF MISTY M. LAUBY IN SUPPORT OF MOTION FOR FINAL
APPROVAL

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

3. I began working as an attorney for Fernandez & Lauby, LLP (now Lauby, Mankin & Lauby, LLP) in 2006. From 2006 through March 2018, I worked in the firm's insurance defense department as the handling attorney in approximately 250-350 complex construction defect litigation matters that I successfully managed and settled on behalf of multiple insurance carrier and contractor clients.

5. The vast majority of my employment cases have been litigated as class actions, representative PAGA actions or a combination of the two.

6. I have been the handling attorney on over 47 class action and/or representative PAGA actions. And, on these cases, myself and/or my firm have been appointed Class Counsel on over 27 cases, and have helped recover over \$23,000,000 for my clients, the employees, and the State of California.

7. I have been involved in one contested class certification motion in a case that settled just prior to the class certification hearing.

8. I have been involved in one contested class certification motion in a case that settled just prior to the class certification hearing.

///

1 **COUNSEL PERFORMED EXTENSIVE DISCOVERY AND ANALYSIS**
2 **TO DETERMINE THE SETTLEMENT AND ALLOCATION WAS FAIR**
3 **TO THE CLASS**

4 9. As discussed in my declaration supporting preliminary approval,
5 prior to reaching the Settlement after two mediations, I served informal and
6 formal written discovery and reviewed and received policy documents,
7 correspondence, and damages data including detailed information relating to the
8 drivers' workweeks at various rates of pay, shift totals at various rates of pay,
9 which were painstakingly allocated amongst the various claims and time periods
10 where those claims were at issue to ensure that the settlement was adequate and
11 divided fairly between the Class Members.

12 **HOURS INCURRED**

13 10. I have spent 335.50 hours working on this action and have kept
14 contemporaneous records of these billable hours. To that end, I performed
15 substantial work on this case, including significant pre-filing work, legal research
16 regarding nuanced and issues unique to this matter, review and analysis of
17 voluminous records from Defendant in informal and formal discovery to verify
18 and value the claims herein, and work on two mediation sessions, preliminary and
19 final approval processes. A spreadsheet of my billing is attached hereto as **Exhibit**
20 **A.**

21 **HOURLY RATE**

22 11. My billing rate is \$650 per hour, and this rate is usual and customary
23 for class action and/or PAGA practitioners with my level of expertise and
24 experience.

25 12. This rate is consistent with Plaintiff and Defense attorneys who handle
26 complex class action litigation, if not somewhat lower. For instance, the 2023
27 Wolters Kluwer Real rate Report ("Real Rate Report") states that the rates for
28 partners in Los Angeles are between \$840 and \$1,159 for the middle and upper

1 quartiles.

2 13. Importantly, the Real Rate Report data is not based on self-reported
3 numbers, surveys, or sampling – instead, these figures are based on an analysis of
4 the actual amounts billed to clients based on more than 160 billion in billing
5 entries.

6 14. My requested rate is also reasonable, consistent and less than the rate
7 found in the Laffey Matrix (www.laffeymatrix.com), which indicates that the
8 benchmark rate for an attorney that graduated law school in 2006 is \$878.

9 15. My hourly rate has been approved by various courts in California,
10 including the following non-exhaustive list of recent settlements for which I have
11 been the handling attorney:

12 a. *Robertson v. All Care*, Los Angeles Superior Court, Case No
13 20STCV18318 (March 17, 2022) (\$1.4M wage-and-hour class and PAGA
14 settlement approved with lodestar cross-check of \$650 rate).

15 b. *Morales v. VPET*, San Bernardino Superior Court, Case No.
16 CIVSB2108161 (November 22, 2022) (\$250,000 wage-and-hour class and PAGA
17 settlement approved with lodestar cross-check of \$650 rate).

18 c. *Moreno v. JJ Kane*, Riverside Superior Court, Case No.
19 CVRI2101236 (September 7, 2022) (\$235,000 wage-and-hour class and PAGA
20 settlement approved with lodestar cross-check of \$650 rate).

21 d. *Blanton v. CTDI*, San Joaquin Superior Court, Case No. STK-CV-
22 UOE-2021-0005136, (August 23, 2023) (\$2,000,000 wage-and-hour class and
23 PAGA settlement approved with lodestar cross-check of \$650 rate).

24 e. *Zuniga v. Desert AIDS Project*, Riverside Superior Court, Case No.
25 RIC2003219, (August 25, 2023) (\$400,000 wage-and-hour class and PAGA
26 settlement approved with lodestar cross-check of \$650 rate).

27 f. *Northrup v Guyou*, Riverside Superior Court Case No. CVRI2105858
28 (December 15, 2023) (\$300,000 wage-and-hour class and PAGA settlement

1 approved with lodestar cross-check of \$650 rate).

2 g. *Rodarte v. Wright Business Graphics*, San Bernardino Superior Court
3 Case No. CIVSB2206705, (December 6, 2023)(\$310,000 wage-and-hour class and
4 PAGA settlement approved with lodestar cross-check of \$650 rate).

5 h. *Zubia v. Procter & Gamble*, Los Angeles Superior Court Case No.
6 20STCV44506, (January 17, 2024) (\$3,750,000 wage-and-hour class and PAGA
7 settlement approved with lodestar cross-check of \$650 rate).

8 i. *Lopez v. Martinez Concrete*, San Bernardino Superior Court Case No.
9 CIVSB2208282 (February 27, 2024) (\$350,977.22 wage-and-hour class and
10 PAGA settlement approved with lodestar cross-check of \$650 rate).

11 j. *Valenzuela v. Clarkwestern*, Sacramento Superior Court Case No. 34-
12 2021-00307823-CU-OE-GDS (April 12, 2024) (\$2,500,000 wage-and-hour class
13 and PAGA settlement approved with lodestar cross-check of \$650 rate).

14 k. *Calderon v. Prudential*, Los Angeles Superior Court Case No.
15 22STCV13172 (July 3, 2024) (\$438,361 wage-and-hour class and PAGA
16 settlement approved with lodestar cross-check of \$650 rate).

17 l. *Johnson v. J.G. Wentworth*, San Diego Superior Court Case No. 30-
18 2022-000487-CU-OE-CTL (August 16, 2024) (\$438,361 wage-and-hour class and
19 PAGA settlement approved with lodestar cross-check of \$650 rate).

20 m. *Ramos v. White Lines*, San Bernardino Superior Court Case NO.
21 CIVSB2216314 (August 22, 2024) (\$825,000 wage-and-hour class and PAGA
22 settlement approved with lodestar cross-check of \$650 rate).

23 n. *Hagon v Transport Corporation of America, Inc.*, San Bernardino
24 Superior Court Case NO. CIVSB2203409 (August 27, 2024) (\$515,000 wage-and-
25 hour class and PAGA settlement approved with lodestar cross-check of \$650 rate).

26 o. *Ramos v. White Lines*, San Bernardino Superior Court Case No.
27 CIVSB2216314 (August 22, 2024) (\$825,000 wage-an-hour class and PAGA
28 settlement approved with lodestar cross-check of \$650 rate).

p. *Nava v. Temecula Valley Drywall, Inc.*, Riverside Superior Court Case No. CVRI2400423 (July 15, 2025) (\$475,000 wage-and-hour class and PAGA settlement approved with lodestar cross-check of \$650 rate).

q. *Gallardo v Classic Collision*, Riverside Superior Court Case No. CVRI2303068 (August 14, 2025) (\$1,400,000 wage-and-hour class and PAGA settlement approved with lodestar cross-check of \$650 rate).

r. *Ramirez v. Inland 211*, Riverside Superior Court Case No. CVRI2305899 (August 14, 2025) (\$217,500 wage-and-hour class and PAGA settlement approved with lodestar cross-check of \$650 rate).

COSTS

16. My firm incurred costs in the amount of \$26,599.09. A detailed Cost Report is attached hereto as **Exhibit B**.

SUBMITTAL TO THE LWDA

17. On December 9, 2025, my office submitted the motion for final approval and the motion for attorneys' fees, costs and a service payment, to the California Labor and Workforce Development Agency (the "LWDA") pursuant to the LWDA notice requirements for settlements under the California Labor Code Private Attorneys General Act, Cal. Lab. Code § 2699(*I*)(2). The proof of submission is attached hereto as **Exhibit C**.

CONCLUSION

18. For the foregoing reasons, and those set forth in the motion and declaration of Misty Lauby, it is respectfully requested that the Court grant final approval of the settlement as being fair, reasonable, and in the best interests of the class, as well as approve the requested attorneys' fees, costs, and enhancement payment to the Class Representative.

1 I declare under penalty of perjury under the laws of the State of California
2 that the foregoing is true and correct. Executed on December 9, 2025, at Los
3 Angeles, California.
4

5 By: s/ Misty M. Lauby
6 Misty M. Lauby, Esq.
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF MISTY M. LAUBY IN SUPPORT OF MOTION FOR FINAL
APPROVAL

EXHIBIT “A”

Guthrie v ITS Logistics
LML Detailed Billing Records

Date	Attorney	Description	Hours	Rate	Amount
12/15/2020	Misty M. Lauby	Initial call with client to obtain baseline information; begin claims investigation; Exchange emails with client; Review and analyze all client documents	3.80	\$650	\$ 2,470.00
12/16/2020	Misty M. Lauby	Text messages from client re additional information	0.10	\$650	\$ 65.00
12/17/2020	Misty M. Lauby	Email from Client re additional documents	0.20	\$650	\$ 130.00
12/18/2020	Misty M. Lauby	Research into corporate entity, including financials and collectability; conduct in-depth search of all possible counties/venues to determine whether there are any pending cases in CA state or federal courts with same or similar claims	2.70	\$650	\$ 1,755.00
12/21/2020	Misty M. Lauby	Phone call with client re: facts and claims; Further research into various claims	3.10	\$650	\$ 2,015.00
2/8/2021	Misty M. Lauby	Draft Demand for records and Demand to preserve evidence	1.20	\$650	\$ 780.00
2/26/2021	Misty M. Lauby	Review email attaching clients personnel file and wage statements	0.10	\$650	\$ 65.00
3/3/2021	Misty M. Lauby	Text to client re questions	0.10	\$650	\$ 65.00
3/4/2021	Misty M. Lauby	Draft 7-page PAGA letter to LWDA and Defendant with facts and alleged violations	3.20	\$650	\$ 2,080.00
3/5/2021	Misty M. Lauby	Begin drafting lengthy class action complaint	4.10	\$650	\$ 2,665.00
3/9/2021	Misty M. Lauby	Finalize drafting 34-page class complaint	4.30	\$650	\$ 2,795.00
3/9/2021	Misty M. Lauby	Call with client updating re: filed complaint	0.30	\$650	\$ 195.00
3/18/2021	Misty M. Lauby	Review County of Merced Notice of Case Management Conference	0.10	\$650	\$ 65.00
3/19/2021	Misty M. Lauby	Review Wage Statement and Personnel file produced by Defendnt	2.30	\$650	\$ 1,495.00
3/19/2021	Misty M. Lauby	Draft email to client re receipt of Personnel File	0.20	\$650	\$ 130.00
3/20/2021	Misty M. Lauby	Review additional policy document provided by Client	0.10	\$650	\$ 65.00
3/22/2021	Misty M. Lauby	Reviw Order: Assignment for All Purposes of Hon. Brian L. McCabe. Research Judge	0.60	\$650	\$ 390.00
5/4/2021	Misty M. Lauby	Review Defendant's Answer to Complaint	0.40	\$650	\$ 260.00
5/5/2021	Misty M. Lauby	Case review meeting; TC iwth client re: status	0.60	\$650	\$ 390.00
5/10/2021	Misty M. Lauby	Review Notice of Removal; Legal research re: propriety of removal; Draft memo re: same; Conference with BJM, Order Setting MSC 7-22-21, Magistrate Judge Consent.	5.20	\$650	\$ 3,380.00
5/11/2021	Misty M. Lauby	F/U call with client re removal to Federal Court	0.60	\$650	\$ 390.00
6/1/2021	Misty M. Lauby	Internal correspondene re removal and potential remand	0.30	\$650	\$ 195.00
6/21/2021	Misty M. Lauby	Internal correspondence re call with OC	0.10	\$650	\$ 65.00
6/21/2021	Misty M. Lauby	Exchange email w/ OC re call to discuss draft report	0.10	\$650	\$ 65.00
6/28/2021	Misty M. Lauby	TC with OC and BJM re joint report	0.40	\$650	\$ 260.00
6/30/2021	Misty M. Lauby	TC and email to client re status and additional pay records	0.40	\$650	\$ 260.00
7/5/2022	Misty M. Lauby	Reviw EDCA Local Rules	1.30	\$650	\$ 845.00
7/5/2021	Misty M. Lauby	Draft Joint Rule 26(f) Report	2.70	\$650	\$ 1,755.00
7/6/2021	Misty M. Lauby	M&C with OC re Joint Rule 26(f) Report	0.70	\$650	\$ 455.00
7/15/2021	Misty M. Lauby	Revise Joint report with OC's edits	0.30	\$650	\$ 195.00
7/22/2021	Misty M. Lauby	TC w/ OC	0.20	\$650	\$ 130.00
8/11/2021	Misty M. Lauby	TC w/ OC	0.30	\$650	\$ 195.00
8/12/2024	Misty M. Lauby	Draft Plaintiff's initial disclosures and prepare documents for production	3.60	\$650	\$ 2,340.00
8/13/2021	Misty M. Lauby	Review email from OC re initial disclosures	0.10	\$650	\$ 65.00
8/23/2021	Misty M. Lauby	Reviw Defendant initial disclosure documents	2.40	\$650	\$ 1,560.00
8/24/2021	Misty M. Lauby	Review additioinal document produced by Defendnat	0.40	\$650	\$ 260.00
8/25/2021	Misty M. Lauby	Draft Informal Discovery Requests for Mediation	1.40	\$650	\$ 910.00

Guthrie v ITS Logistics
LML Detailed Billing Records

Date	Attorney	Description	Hours	Rate	Amount
8/27/2021	Misty M. Lauby	Draft FAC for OC review	4.30	\$650	\$ 2,795.00
9/7/2021	Misty M. Lauby	Exchange several emails with OC re mediator selection and scheduling	0.40	\$650	\$ 260.00
9/10/2021	Misty M. Lauby	TC and email to client re status additional issues at work	0.60	\$650	\$ 390.00
9/17/2021	Misty M. Lauby	TC with client and F/U email re additional questions	0.30	\$650	\$ 195.00
9/21/2021	Misty M. Lauby	Exchange further emails with OC re mediator selection and scheduling	0.20	\$650	\$ 130.00
9/28/2021	Misty M. Lauby	Email to OC re stip to advise court of mediation	0.10	\$650	\$ 65.00
10/4/2021	Misty M. Lauby	Exchange emails with OC re FAC filing after mediation	0.10	\$650	\$ 65.00
11/23/2021	Misty M. Lauby	Exchange email with OC re extension on mediation data and stip to stay	0.20	\$650	\$ 130.00
11/29/2021	Misty M. Lauby	Draft Joint Stip Vacating Dates Set by August 6, 2021 Minute order	0.40	\$650	\$ 260.00
12/10/2021	Misty M. Lauby	Review Order Granting Stip to Vacate Dates	0.10	\$650	\$ 65.00
12/30/2021	Misty M. Lauby	Review email from OC re mediation data; review data prior to sending to consultant for analysis	1.70	\$650	\$ 1,105.00
1/7/2022-2/15/2022	Misty M. Lauby	Exchange several emails with OC re mediation settlement demand	0.60	\$650	\$ 390.00
2/11/2022	Misty M. Lauby	Review email from OC re updated policy document	0.20	\$650	\$ 130.00
2/16/2022	Misty M. Lauby	Interoffice conference re settlement demand; Draft email to OC re settlement demand	0.70	\$650	\$ 455.00
2/17/2022-3/3/2025	Misty M. Lauby	Draft 16-page Mediation Brief, prepare exhibits, prepare risk assessment, lengthy telephone calls with client re facts, legal research regarding all claims including piece rate issues under Ayala, Labor Code 226 requirements for piece rate drivers, FMCSA preemption issues, contract wages for rest breaks and stop pay under Oman, among other issues; prepare risk assessment	37.80	\$650	\$ 24,570.00
3/8/2025	Misty M. Lauby	Appear at Mediation with Michael Marcus	7.60	\$650	\$ 4,940.00
3/9/2025	Misty M. Lauby	Draft MOU	3.40	\$650	\$ 2,210.00
3/10/2022	Misty M. Lauby	Draft Joint Report re Notice of Settlement	0.20	\$650	\$ 130.00
3/14/2022	Misty M. Lauby	Draft text to client re mediation	0.30	\$650	\$ 195.00
3/17/2022	Misty M. Lauby	Review Order Setting Deadline to file MPA; Review Grosjean and Ishii Standard Procedures	0.60	\$650	\$ 390.00
6/12/2022	Misty M. Lauby	Draft Claims and Defenses and Kullar analysis for Motion for Preliminary Approval; draft Lauby Declaration and client declaration in support	7.40	\$650	\$ 4,810.00
6/13/2022	Misty M. Lauby	Text to client re questions for MPA; lengthy phone call re MPA process	0.80	\$650	\$ 520.00
6/14/2022	Misty M. Lauby	TC and text messages to client re settlement agreement and MOU	1.30	\$650	\$ 845.00
8/16/2022	Misty M. Lauby	Prepare for and Appear for Hearing on Motion for Preliminary Approval of Class Action Settlement	2.80	\$650	\$ 1,820.00
8/25/2022	Misty M. Lauby	Appear for Zoom with BJM and OC re MPA Findings and Recommendations, plan going forward	1.20	\$650	\$ 780.00
9/6/2022	Misty M. Lauby	Review 56-page transcript of MPA hearing and prepare plan for supplemental filing in support of MPA	3.80	\$650	\$ 2,470.00
9/8/2022	Misty M. Lauby	Prepare chart of issues identified by Court in F&R, proposals for addressing deficiencies; TC with Ocb re same	3.60	\$650	\$ 2,340.00
9/9/2022	Misty M. Lauby	Begin drafting Joint Supplemental Response iso MPA	6.40	\$650	\$ 4,160.00

Guthrie v ITS Logistics
LML Detailed Billing Records

Date	Attorney	Description	Hours	Rate	Amount
9/26/2022	Misty M. Lauby	Draft Stip and Order to Continue Deadline for Supplemental Motion for Preliminary Approval	0.20	\$650	\$ 130.00
9/28/2022	Misty M. Lauby	Review Signed Order re Stip to Continue Supp MPA Deadline	0.10	\$650	\$ 65.00
10/18/2022	Misty M. Lauby	Draft 2nd Stip and Order to Continue Supp MPA Deadline	0.20	\$650	\$ 130.00
10/20/2022	Misty M. Lauby	Review Signed Order re 2nd Stip to Continue Supp MPA Deadline	0.10	\$650	\$ 65.00
11/18/2022	Misty M. Lauby	TC with client	0.30	\$650	\$ 195.00
11/20/2022	Misty M. Lauby	Draft Joint Motion Requesting Final Brief Extension to Deadline to File Supplemental Papers ISO Motion for Preliminary Approval	0.30	\$650	\$ 195.00
11/21/2022	Misty M. Lauby	Review authorities and additional data provided by OC in support of supplemental Response iso MPA	2.80	\$650	\$ 1,820.00
11/22/2022	Misty M. Lauby	Review Signed Order re MX for Extension	0.10	\$650	\$ 65.00
11/22/2022	Misty M. Lauby	Continue drafting Joint Supplemental Response	3.70	\$650	\$ 2,405.00
11/22/2022	Misty M. Lauby	Draft Supplemental Lauby Declaration in support of Joint Response	1.30	\$650	\$ 845.00
1/6/2023	Misty M. Lauby	Email to consultant re retention for mediation; prepare documents for transmittal to consultant	0.60	\$650	\$ 390.00
1/11/2023	Misty M. Lauby	Review/revise 2nd Joint Supplemental Response prepared by OC	1.80	\$650	\$ 1,170.00
1/12/2023	Misty M. Lauby	TC and text messages to client re revised settlement agreement	0.60	\$650	\$ 390.00
1/12/2023	Misty M. Lauby	Draft/revise Revised class action settlement agreement	2.80	\$650	\$ 1,820.00
1/18/2023	Misty M. Lauby	Exchange emails with consultant re progress of analysis	0.10	\$650	\$ 65.00
2/2/2023	Misty M. Lauby	Exchange emails with consultant re status	0.10	\$650	\$ 65.00
2/3/2023	Misty M. Lauby	TC with consultant re questions; forward email from OC with information re data and our data requests	0.30	\$650	\$ 195.00
2/3/2023	Misty M. Lauby	Review consultants data analysis	4.20	\$650	\$ 2,730.00
3/2/2023	Misty M. Lauby	Text message and TC with client re approval process and status	0.40	\$650	\$ 260.00
3/24/2023	Misty M. Lauby	Exchange texts with client re status questions	0.10	\$650	\$ 65.00
4/5/2023	Misty M. Lauby	Review 36-page Findings and Recommendations Recommending that MPA be Denied without Prejudices	1.40	\$650	\$ 910.00
4/11/2023	Misty M. Lauby	Review Notice of Reassignment from Judge Ishii to Judge de Alba	0.10	\$650	\$ 65.00
4/11/2023	Misty M. Lauby	Review Joint Request for Extension of Time to File Objections to Findings and Recommendations prepared by OC	0.30	\$650	\$ 195.00
4/28/2023	Misty M. Lauby	Review Defendant's Objections to Findings and Recommendations	0.90	\$650	\$ 585.00
5/25/2023	Misty M. Lauby	Draft Joint Status Report	0.60	\$650	\$ 390.00
6/30/2023	Misty M. Lauby	Review Order Adopting F&R	0.20	\$650	\$ 130.00
7/5/2023	Misty M. Lauby	Review Order Requiring Joint Status Report	0.10	\$650	\$ 65.00
7/23/2023	Misty M. Lauby	Draft Joint Status Report	1.20	\$650	\$ 780.00
10/18/2023	Misty M. Lauby	Begin drafting revised FAC to eliminate claims with no potential value	6.90	\$650	\$ 4,485.00
12/4/2023	Misty M. Lauby	Review Order of Temporary Reassignment to No DC Judgee	0.10	\$650	\$ 65.00
12/14/2023	Misty M. Lauby	TC with client re status	0.20	\$650	\$ 130.00
12/26/2023	Misty M. Lauby	Draft Stip to File FAC	0.60	\$650	\$ 390.00
12/27/2023	Misty M. Lauby	Finalize and file FAC	1.40	\$650	\$ 910.00
1/8/2024	Misty M. Lauby	Review Signed Order re FAC	0.10	\$650	\$ 65.00
2/7/2024	Misty M. Lauby	Review Defendant's Answer to FAC	0.60	\$650	\$ 390.00
2/24/2024	Misty M. Lauby	Draft Joint Report	1.30	\$650	\$ 845.00
2/29/2024	Misty M. Lauby	Review Defendant's Motion to Cont Mid-Discovery Status Conference	0.20	\$650	\$ 130.00

Guthrie v ITS Logistics
LML Detailed Billing Records

Date	Attorney	Description	Hours	Rate	Amount
2/29/2024	Misty M. Lauby	Review Order Vacating Case Deadlines	0.10	\$650	\$ 65.00
3/14/2024	Misty M. Lauby	Review Order of Reassignment to Judge Sherriff	0.10	\$650	\$ 65.00
6/4/2024	Misty M. Lauby	Draft SROGS and RFP to Defendants	5.90	\$650	\$ 3,835.00
6/27/2024	Misty M. Lauby	TC and F/U email with client re deposition scheduled by Defendant	1.60	\$650	\$ 1,040.00
7/3/2024	Misty M. Lauby	TC with client re questions and status	0.60	\$650	\$ 390.00
7/23/2024	Misty M. Lauby	Text to client re deposition postponement	0.10	\$650	\$ 65.00
7/15/2024 - 8/1/2024	Misty M. Lauby	Draft Second Mediation Brief; prepare exhibits; prepare risk assessment	27.80	\$650	\$ 18,070.00
7/18/2024	Misty M. Lauby	Review Defendant's production of documents	6.60	\$650	\$ 4,290.00
7/30/2024	Misty M. Lauby	Review Defendant's responses to SROGS and RFPS	5.70	\$650	\$ 3,705.00
8/6/2024	Misty M. Lauby	Appear at Mediation with Tripper Ortman	6.90	\$650	\$ 4,485.00
8/15/2024	Misty M. Lauby	Draft Joint Report	0.40	\$650	\$ 260.00
8/26/2024	Misty M. Lauby	Email to OC re additional data points needed to address issues with previous settlement	0.70	\$650	\$ 455.00
8/29/2024	Misty M. Lauby	TC with OC re additional data	0.30	\$650	\$ 195.00
9/1/2024 - 9/23/2024	Misty M. Lauby	Email campaign to class members for information; talk to numerous class members regarding their experiences	12.70	\$650	\$ 8,255.00
9/18/2024	Misty M. Lauby	Draft Joint Report	0.30	\$650	\$ 195.00
9/19/2024	Misty M. Lauby	Furhter TC with OC re status report and other issue	0.20	\$650	\$ 130.00
9/19/2024	Misty M. Lauby	TC with client re discovery responses	0.20	\$650	\$ 130.00
9/20/2024	Misty M. Lauby	Draft retainer email to new consultant with summary of history of the case and necessary analysis	0.60	\$650	\$ 390.00
9/23/2024	Misty M. Lauby	TC with consultant re questions and necessary analysis	0.40	\$650	\$ 260.00
10/2/2024	Misty M. Lauby	TC with consultant re mediation analysis; email with additional information	0.30	\$650	\$ 195.00
10/9/2024	Misty M. Lauby	Review email from consultant re need additional information	0.10	\$650	\$ 65.00
10/15/2025	Misty M. Lauby	Email exchange with OC re additional data needed	0.10	\$650	\$ 65.00
11/5/2024	Misty M. Lauby	Draft email to consultant with additional information from OC	0.10	\$650	\$ 65.00
11/5/2024	Misty M. Lauby	Draft Joint Report	0.20	\$650	\$ 130.00
11/12/2024	Misty M. Lauby	Email to consultant re status of mediation analysis	0.10	\$650	\$ 65.00
11/14/2024	Misty M. Lauby	Review mediation analysis from consultant	3.70	\$650	\$ 2,405.00
11/29/2024	Misty M. Lauby	TC with client re status	0.20	\$650	\$ 130.00
12/2/2024	Misty M. Lauby	Exchnage emails with consultant re request for additional analysis	0.30	\$650	\$ 195.00
12/4/2024	Misty M. Lauby	Exchange emails with consultant re questions from OC	0.20	\$650	\$ 130.00
12/7/2024	Misty M. Lauby	Draft Joint Report re Notice of Settlement	0.20	\$650	\$ 130.00
12/10/2024	Misty M. Lauby	Review Order Setting Deadline to File MPA	0.10	\$650	\$ 65.00
12/11/2024	Misty M. Lauby	TC with client re settlement	0.30	\$650	\$ 195.00
3/5/2025 - 3/23/2025	Misty M. Lauby	Draft Renewed Motion for Preliminary Approval; Draft Settlement Agreement; numerous calls and emails with OC re same	42.60	\$650	\$ 27,690.00
3/5/2025	Misty M. Lauby	Review bids from CPT, Xpand, Phoenix, and Rust	0.10	\$650	\$ 65.00
3/5/2025	Misty M. Lauby	Emai to ILYM requesting bid, reviw bid	0.10	\$650	\$ 65.00
3/9/2025	Misty M. Lauby	Draft Stip and Order to Continue Deadline to file MPA	0.40	\$650	\$ 260.00
3/17/2025	Misty M. Lauby	Draft 2nd Stip and Order to Continue MPA Deadline	0.20	\$650	\$ 130.00
3/18/2025	Misty M. Lauby	Review Minute Order re Continuance of MPA Deadline	0.10	\$650	\$ 65.00
3/20/2025	Misty M. Lauby	TC with client re new settlement agreement	1.40	\$650	\$ 910.00
4/4/2025	Misty M. Lauby	Exchange texts with client re next steps	0.20	\$650	\$ 130.00
4/21/2025	Misty M. Lauby	Appear for Hearing on Renewed Motion for PA	0.90	\$650	\$ 585.00

Guthrie v ITS Logistics
LML Detailed Billing Records

Date	Attorney	Description	Hours	Rate	Amount
5/1/2025	Misty M. Lauby	Exchange text with client re status and further briefing	0.20	\$650	\$ 130.00
6/5/2025	Misty M. Lauby	Exchange text with client re questions	0.20	\$650	\$ 130.00
6/26/2025	Misty M. Lauby	TC with client re status	0.10	\$650	\$ 65.00
8/15/2025	Misty M. Lauby	Exchange text with client re status	0.10	\$650	\$ 65.00
9/10/2025	Misty M. Lauby	Exchange text with client re recommendaion for preliminary approval and further handling	0.30	\$650	\$ 195.00
9/23/2025	Misty M. Lauby	Draft Plaintiff's Consent to Magistrate Jurisdiction	0.10	\$650	\$ 65.00
9/25/2025	Misty M. Lauby	Review Order Reassigning Case	0.10	\$650	\$ 65.00
9/30/2025	Misty M. Lauby	Draft email to ILYM attaching MPA order and settlement docs; review response	0.20	\$650	\$ 130.00
10/3/2025	Misty M. Lauby	Review email from OC to ILYM re data	0.10	\$650	\$ 65.00
10/17/2025	Misty M. Lauby	Review email from OC re update on data for Admin	0.10	\$650	\$ 65.00
10/20/2025	Misty M. Lauby	Review email from ILYM re conf. receipt of data	0.10	\$650	\$ 65.00
10/28/2025	Misty M. Lauby	Review email from ILYM re mailing docs for review and approval	0.60	\$650	\$ 390.00
10/29/2025	Misty M. Lauby	TC with client re status of class notice	0.20	\$650	\$ 130.00
10/29/2025	Misty M. Lauby	Review email from ILYM re preliminary calculations for review and approval	0.40	\$650	\$ 260.00
10/30/2025	Misty M. Lauby	Review email from OC re comments and request for Guthrie example	0.20	\$650	\$ 130.00
10/30/2025	Misty M. Lauby	Review ILYM email re sample notice for PLA	0.10	\$650	\$ 65.00
10/30/2025	Misty M. Lauby	Exchange email with OC re issues with notice/concerns	0.30	\$650	\$ 195.00
10/31/2025	Misty M. Lauby	Review revised notice from ILYM; exchange emails re approval, review email re mailing date	0.20	\$650	\$ 130.00
11/7/2025	Misty M. Lauby	Review timeline from admin	0.10	\$650	\$ 65.00
11/7/2025	Misty M. Lauby	Exchange email with BJM and OC re concerns regarding timeline	0.20	\$650	\$ 130.00
11/18/2025	Misty M. Lauby	Rev OC email to ILYM re status reports; review status report	0.10	\$650	\$65
11/26/2025	Misty M. Lauby	Review weekly report from ILYM	0.10	\$650	\$65
12/1/2025 - 12/9/2025	Misty M. Lauby	Draft Motion for Final Approval and Atty Fees and Costs; Draft Declarations of MML and Client in Support; TC with client re same	36.40	\$650	\$23,660
12/8/2025	Misty M. Lauby	Rev weekly report from ILYM	0.10	\$650	\$ 65.00
12/9/2025	Misty M. Lauby	Exchange text with client re MFA and declation	0.40	\$650	\$ 260.00
Subtotals for Misty M. Lauby			335.50		\$ 218,075.00

EXHIBIT “B”

All Expenses

Lauby, Mankin & Lauby LLP

Staff Member = All (Inactive Included)
 Group By Staff Member Group
 Client - Project = 14000-00446 Guthrie v ITS
 Logistics (Active Only)
 Activity Code = All
 Expense Code = All
 View = Original
 Approval Status = All
 Selected Expenses = All
 From Earliest To Latest

Entered	Status	Expense	Staff Member	Price	Mark Up %	Qty	Amount
Keith Guthrie 14000-00446 Guthrie v ITS Logistics							
02-26-2021	Approved	E108 Postage	Aguilera, Sophia J.	7.87	0.00	1.00	7.87
	Postage for the month of February 2021						
02-26-2021	Approved	E101 Copying	Aguilera, Sophia J.	0.20	0.00	14.00	2.80
	14 copies @ \$0.20 for Letters to employer						
03-05-2021	Approved	E112 Court fees	Aguilera, Sophia J.	75.00	0.00	1.00	75.00
	LWDA Order Number: ORD-000098548 to submit PAGA letter Case Number: LWDA-CM-823782-21						
03-17-2021	Approved	E112 Court fees	Aguilera, Sophia J.	1,493.55	0.00	1.00	1,493.55
	One Legal Order #15980712 to file Complaint						
04-14-2021	Approved	Attorney Service	Aguilera, Sophia J.	151.20	0.00	1.00	151.20
	Bosco Inv 5531243 Serve: ITS Logistics, LLC, a Delaware Company Summons; Complaint; Civil Case Cover Sheet; Notice of Case Management Conference; Notice of Inclusion in Delay Reduction Program; Order: Assignment for all Purposes; ADR Court: Superior Court of California- County of Merced						
04-30-2021	Approved	E108 Postage	Aguilera, Sophia J.	7.87	0.00	1.00	7.87
	Postage for the month of April 2021						
04-30-2021	Approved	E101 Copying	Aguilera, Sophia J.	0.20	0.00	12.00	2.40
	12 copies @ \$0.20 for LWDA letter						
07-01-2021	Approved	Attorney Service	Aguilera, Sophia J.	38.80	0.00	1.00	38.80
	SDSC purchase confirmation number 2014521 for copies of docs						
09-22-2021	Approved	E125 Mediation fees	Aguilera, Monica A	5,000.00	0.00	1.00	5,000.00
	ADR Services Inv No. 21-5239-MDM-01 for 3-08-22 Mediation						
10-14-2021	Approved	E112 Court fees	Aguilera, Monica A	4.20	0.00	1.00	4.20
	Pacer Billing from 7/01 - 9/30/2021						
10-14-2021	Approved	Attorney Service	Aguilera, Monica A	5.75	0.00	1.00	5.75
	Budget Conferencing Inv #30720903 from 8/23/21						
01-20-2022	Approved	E112 Court fees	Aguilera, Monica A	0.60	0.00	1.00	0.60
	PACER Fees 10/1/21 - 12/31/21						
03-14-2022	Approved	E119 Experts	Grossi, Tracie L.	1,650.00	0.00	1.00	1,650.00
	Berger Consulting Group Inv#5701						
04-19-2022	Approved	Attorney Service	Grossi, Tracie L.	18.50	0.00	1.00	18.50
	Budget Conferencing Inv 30877625 for 4/6/22 conf call						
06-17-2022	Approved	Attorney Service	Chiarito, Tracie	201.05	0.00	1.00	201.05

All Expenses

Lauby, Mankin & Lauby LLP

Staff Member = All (Inactive Included)
Group By Staff Member Group
Client - Project = 14000-00446 Guthrie v ITS
Logistics (Active Only)
Activity Code = All
Expense Code = All
View = Original
Approval Status = All
Selected Expenses = All
From Earliest To Latest

Entered	Status	Expense	Staff Member	Price	Mark Up %	Qty	Amount
Keith Guthrie							
14000-00446 Guthrie v ITS Logistics							
BOSCO INV# 7239017							
Deliver chambers copies of the attached to the Clerk's Office of the United States District Court, Eastern District, 2500 Tulare Street, Suite 1501, Fresno, CA 93721. Please make sure they are two-hole punched, stapled at the top left corner, exhibits are tabbed, and labeled COURTESY COPIES on the face sheet of the documents by 4 pm today.							
11-29-2022	Approved	Attorney Service	Charlito, Tracie	223.80	0.00	1.00	223.80
Bosco Inv #8007905							
Deliver chambers copies of the attached to the Clerk's Office of the United States District Court, Eastern District, 2500 Tulare Street, Suite 1501, Fresno, CA 93721. Please make sure they are two-hole punched, stapled at the top left corner, exhibits are tabbed, and labeled COURTESY COPIES on the face sheet of the documents by 4 pm on Monday, November 29, 2022							
-Joint Supplemental Response							
-Supplemental Declaration							
-Declaration							
Court: United States District Court - Eastern Division, Robert E. Coyle Federal Courthouse							
Completed on: 11/28/2022							
01-03-2023	Approved	E112 Court fees	Charlito, Tracie	3.40	0.00	1.00	3.40
PACER fees for 4th quarter 2022							
01-16-2023	Approved	Attorney Service	Charlito, Tracie	194.65	0.00	1.00	194.65
Bosco Inv #8226829							
Deliver chambers copies of the attached to the Clerk's Office of the United States District Court, Eastern District, 2500 Tulare Street, Suite 1501, Fresno, CA 93721. Please make sure they are two-hole punched, stapled at the top left corner, exhibits are tabbed, and labeled COURTESY COPIES on the face sheet of the documents by 4 pm on Tuesday, January 17, 2023.							
-Joint Supplement							
Court: United States District Court - Eastern Division, Robert E. Coyle Federal Courthouse							
Completed on: 01/13/2023							
03-31-2023	Approved	E112 Court fees	Charlito, Tracie	0.50	0.00	1.00	0.50
PACER fees for 1st Quarter 2023							
02-01-2024	Approved	E125 Mediation fees	Charlito, Tracie	13,000.00	0.00	1.00	13,000.00
Ortman Mediation Invoice for 8/6/24 mediation with Tripper Ortman							
10-31-2024	Approved	E119 Experts	Charlito, Tracie	1,937.50	0.00	1.00	1,937.50
DMA Invoice #310901							
11-30-2024	Approved	E119 Experts	Charlito, Tracie	1,387.50	0.00	1.00	1,387.50
DMA Invoice #311003							
12-31-2024	Approved	E119 Experts	Charlito, Tracie	275.00	0.00	1.00	275.00

All Expenses
Lauby, Mankin & Lauby LLP

Staff Member = All (Inactive Included)
Group By Staff Member Group
Client - Project = 14000-00446 Guthrie v ITS
Logistics (Active Only)
Activity Code = All
Expense Code = All
View = Original
Approval Status = All
Selected Expenses = All
From Earliest To Latest

Entered	Status	Expense	Staff Member	Price	Mark Up %	Qty	Amount
<u>Keith Guthrie</u> <u>14000-00446 Guthrie v ITS Logistics</u>							
DMA Invoice #311058							
03-26-2025	Approved	Attorney Service	Chiarito, Tracie	289.20	0.00	1.00	289.20
Bosco Inv #12968509 Please deliver courtesy copies of the attached to the Clerk's Office of the Robert E. Coyle Federal Courthouse located at 2500 Tulare Street, First Floor, Fresno, CA 93721. Please make sure they are two-hole punched, stapled at the top left corner, exhibits are tabbed, and labeled COURTESY COPIES on the face sheet of the documents by 4 pm on Tuesday, March 25, 2025. Motion Notice of Motion Declaration Order Court: United States District Court - Eastern Division, Robert E. Coyle Federal Courthouse Completed on: 3/25/2025							
03-31-2025	Approved	E119 Experts	Chiarito, Tracie	87.50	0.00	1.00	87.50
DMA Inv #311312							
06-10-2025	Approved	Attorney Service	Chiarito, Tracie	266.60	0.00	1.00	266.60
Magna Inv #13477639 Deliver courtesy copies of the attached to the Clerk's Office of the Robert E. Coyle Federal Courthouse located at 2500 Tulare Street, First Floor, Fresno, CA 93721. Please make sure they are two-hole punched, stapled at the top left corner, exhibits are tabbed, and labeled COURTESY COPIES on the face sheet of the documents by 4 pm on Monday, June 9, 2025. -Supplemental Brief -Declaration x2 Court: United States District Court - Eastern Division, Robert E. Coyle Federal Courthouse Completed on: 6/9/2025							
06-13-2025	Approved	Attorney Service	Chiarito, Tracie	233.85	0.00	1.00	233.85
Magna Inv #13514012 Deliver courtesy copies of the attached to the Clerk's Office of the Robert E. Coyle Federal Courthouse located at 2500 Tulare Street, First Floor, Fresno, CA 93721. Please make sure they are two-hole punched, stapled at the top left corner, exhibits are tabbed, and labeled COURTESY COPIES on the face sheet of the documents by 4 pm on Friday, June 12, 2025. -Supplemental Declaration Court: United States District Court - Eastern Division, Robert E. Coyle Federal Courthouse Completed on: 6/12/2025							

Project Total 26,559.09
Client Total 26,559.09
Grand Total 26,559.09

EXHIBIT “C”