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12 Attorneys for Plaintiff,
13 GABRIELA ESCRIBA, and all others similarly situated
14 (Additional Counsel for Plaintiffs listed on following page)

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF SAN JOAQUIN**
17 **(UNLIMITED JURISDICTION)**

18 JODIE BLANTON JR., YAZMIN CORTES
19 and GABRIELA ESCRIBA, on behalf of all
20 others similarly situated;

21 Plaintiffs,

22 vs.

23 COMMUNICATIONS TEST DESIGN, INC., a
24 Pennsylvania Corporation, and DOES 1 through
25 20, inclusive;

26 Defendants.

27 AND THE CONSOLIDATED/RELATED
28 ACTIONS.

Case No.: 30-2019-01061296-CU-OE-CJC

**DECLARATION OF DAVID SPIVAK IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Consolidated/Related Actions:

- *Cortes v. Communications Test Design, Inc, et al.*; County of San Bernardino, Case No. CIVSB2108718;
- *Escriba v. Communications Test Design, Inc, et al.*; County of San Bernardino, Case No. CIVSB2115512; U.S.D.C., Central District of CA, Fed. Case No. 5-21-cv-01326-AB-KK



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1 **DECLARATION OF DAVID SPIVAK IN SUPPORT OF PLAINTIFFS' MOTION FOR**
2 **FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

3 I, DAVID SPIVAK, declare as follows:

4 1. I am an attorney duly licensed to practice law in the State of California and am an
5 attorney of record for Plaintiff Gabriela Escriba (referred to as "Plaintiff" or "Plaintiff Escriba")
6 in her lawsuit against Communications Test Design, Inc. ("Defendant"). Plaintiff and Defendant,
7 hereafter are collectively referred to as the "Parties".

8 2. Except as otherwise indicated, I have personal knowledge of all matters set forth
9 herein and, if called as a witness, could and would competently testify thereto under oath.

10 ***Adequacy***

11 3. In 1991, I earned a Bachelor of the Arts degree with a major in Political Science
12 from the University of California at Berkeley. In 1995, I earned a Juris Doctor degree from
13 Southwestern University School of Law.

14 4. In December of 1995, Supreme Court for the State of California admitted me as
15 an Attorney and Counselor at Law and licensed me to practice law in all the Courts of this State.
16 On May 11, 2012, I also became admitted to the District of Columbia Bar. On February 21, 2013,
17 I became admitted to the New York bar.

18 5. I am experienced in handling employment law matters and specifically wage and
19 hour cases. I have been practicing law since 1995. My experience has been almost exclusively in
20 the area of employment law representing employees with claims of wrongful termination,
21 harassment, whistleblower retaliation, discrimination, wage and hour, and family and medical
22 leave violations. I have tried many cases before California and federal courts, government
23 agencies and neutral arbitrators. I am a member of the California Employment Lawyers
24 Association (CELA).

25 6. Since I started practicing law, I have tried many cases before courts, arbitrators
26 and government agencies. Some of my cases are:

27 A. *Ricardo Sandoval v. Dept. of Treasury*, United States District Court,
28 Southern District of California (the Honorable Judith Keep presiding), 1998. Plaintiffs Special



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1 Agent for the U. S. Customs Service alleged discrimination and retaliation in promotions and
2 discipline. The jury awarded compensatory damages. Court subsequently awarded additional
3 back pay and gave Plaintiffs a retroactive promotion. See "Lawsuit Puts Customs Service on Trial:
4 Agent Alleges Corruption, White Supremacist Cabal" by Valerie Alvord, *San Diego Union-
5 Tribune*, April 29, 1998; "Customs Agent Is Awarded \$200,000: Jury Says He Faced Bias And
6 Retaliation" by Valerie Alvord, *San Diego Union-Tribune*, May 16, 1998.

7 B. *Jorge Guzman v. Department of Justice*, United States District Court,
8 Central District of California (the Honorable Lourdes Baird presiding), 1999. Plaintiffs Special
9 Agent for the Immigration and Naturalization Service alleged racial discrimination, retaliation
10 and police brutality by agents of the Office of the Inspector General. Jury found the Defendants
11 liable. Case settled shortly before the damages phase. See "U.S. to Pay \$400,000 to INS Agent in
12 Bias Suit; Courts: Complaint says he suffered 10 years of harassment on the job because he is
13 Latino, including falsified charges" by Patrick J. McDonnell, *Los Angeles Times*, January 21,
14 1999.

15 C. *Dr. Perry Crouch v. SHIELDS*, Los Angeles Superior Court, Compton (the
16 Honorable Michael Rutberg presiding), 2001. Plaintiff whistleblower brought civil rights claims
17 and wrongful termination claims against employer in a month-long jury trial. The jury awarded
18 compensatory and punitive damages. See "Activist Says Criticism of Rail Plan Cost His Job" by
19 Dan Weikel, *Los Angeles Times*, September 28, 2000; "Punitive Damages Awarded to Fired
20 Social Worker" by Dan Weikel, *Los Angeles Times*, June 10, 2000; "A Whistleblower's Revenge"
21 by Susan Goldsmith, *New Times Los Angeles*, June 8, 2000.

22 D. *Imagraph, Inc. (Steve Shiffman) v. Mohamed T. Nehmeh*, Orange County
23 Superior Court, Central Justice Center (the Honorable Kirk H. Nakamura presiding), 2004.
24 Plaintiffs, who I represented *pro bono* sought the return of \$45,000.00 he paid to an attorney
25 escrow officer who subsequently absconded with the money. The jury awarded compensatory
26 damages. The Judgment with interest is now far in excess of that amount. Soon after this case was
27 litigated, the State Bar of California awarded me the Wiley W. Manuel Award for Pro Bono Legal
28 Services.



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1 E. *Rick Pierce v. Department of Treasury*, Merit Systems Protection Board
2 (1999). Administrative Judge awarded compensatory damages to wrongfully terminated Customs
3 Agent, followed by an award of Attorneys' fees and costs.

4 F. *Richard Wamel v. Ocelot Engineering Co.*, Judicate West before the
5 Honorable Robert Polis (ret.) (2008). In that case, I represented a victim of FMLA violations and
6 wrongful termination against his former employer. The Neutral Arbitrator awarded compensatory
7 and liquidated damages. The claims for damages, attorney's fees and costs were resolved shortly
8 thereafter by means of a confidential settlement.

9 G. *Alina Ghrdilyan v. RJ Financial, Inc.*, et al., LA Superior Court case no.
10 BC430633 (2012), the Honorable Ronald Sohigian presiding. To my knowledge, this case is the
11 first and only case to be successfully prosecuted through trial under the Labor Code Private
12 Attorney Generals Act of 2004, Labor Code §§ 2698, *et seq.* on behalf of Plaintiffs and other
13 aggrieved employees against someone other than an employer for civil penalties including unpaid
14 wages. The case involves claims of unpaid overtime, unprovided rest and meal periods, unpaid
15 vacation, untimely interval and final wages, and unreimbursed expenses. For my work in that
16 case, the Court awarded me an hourly rate of \$600.00 hour based on my skill and experience.

17 7. Since 2007, I have prosecuted several traditional wage & hour class actions as the
18 sole or primary attorney for the Plaintiffs, including *Pudelwitts v. Regent Parking, Inc.*, *Singery*
19 *v. Quality Vessel Engineering*, *Tesillo v. LA Executive Towing Service, Inc.*, and *Madison v. The*
20 *Limousine Connection*. One such case is *Jose Tapia v. Mangen Group, Inc.*, LASC case no.
21 BC377114, a garden-variety wage & hour class action with many of the same claims at issue in
22 this case. The Honorable Jane Johnson of the Los Angeles Superior Court, presiding over the
23 motion for final approval of the settlement class action settlement in *Tapia v. Mangen*, had no
24 quarrel with an hourly rate of \$525.00 for my services.

25 8. In my representation of employees, I have prosecuted several lawsuits on behalf
26 of employees with claims of Labor Code violations or other wage claims.

27 9. I have been involved in the prosecution of numerous wage and hour class actions
28 at various stages of litigation. A small sampling of the wage and hour class action cases in which



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1 I have been counsel of record is as follows:

2 A. *Alafa v. Custom Built Personal Training, Inc.*, Tulare County Superior
3 Court, Case No. VCU-245496 (appointed Class Counsel and granted final approval class action
4 settlement on behalf of assistant fitness manager employees).

5 B. *Cuellar v. Lovin Oven*, Orange County Superior Court, Case No. 30-2010-
6 000382146 (appointed Class Counsel and granted final approval of class action settlement by the
7 court on behalf of nonexempt employees).

8 C. *Cunningham v. DPI Specialty Foods West, Inc.*, Los Angeles Sup.Ct., Case
9 No. BC465017 (appointed Class Counsel and granted final approval of class action settlement on
10 behalf of merchandiser employees).

11 D. *Deckard v. MSL Community Management LLC*, Riverside County Superior
12 Court, Case No. RIC1204182 (appointed Class Counsel and granted final approval of class action
13 settlement on behalf of caregivers and medical technicians).

14 E. *DiCato v. Francesca's Collections, Inc.*, San Diego County Superior
15 Court, Case No. 37-2012-00094401-CU-OE-CTL (appointed Class Counsel and granted final
16 approval of class action settlement on behalf of boutique manager and assistant manager
17 employees).

18 F. *Evans v. Equinox, et al.*, Los Angeles Sup.Ct., Case No. BC440058
19 (appointed Class Counsel and granted final approval of class action settlement on behalf of
20 personal trainer employees).

21 G. *Fischer v. National Distribution Centers*, Riverside County Superior
22 Court, Case No. RIC1114952 (appointed Class Counsel and granted final approval of class action
23 settlement on behalf of hourly warehouse employees).

24 H. *Hidalgo, et al. v. Sun Hill*, Los Angeles Superior Court, Case No.
25 BC480808 (appointed Class Counsel and granted final approval of class action settlement on
26 behalf of hourly employees).

27 I. *Huynh v. Carefusion Resources, LLC, et al*, San Diego Sup.Ct., Case No.
28 37-2009-00103277-CU-OE-CTL (appointed Class Counsel and granted final approval of class



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1 action settlement on behalf of medical devices employees).

2 J. *Linder, et al. v. Warehouse Services, Inc.*, San Bernardino Superior Court,
3 Case No. CIVDS1500146 (appointed Class Counsel and granted final approval of class action
4 settlement on behalf of non-exempt hourly employees excluding truck drivers).

5 K. *La Fleur v. Medical Management International, Inc.*, United States District
6 Court, Central District of California, Case No. EDCV13-00398-VAP (appointed Class Counsel
7 and granted final approval of class action settlement on behalf of practice managers).

8 L. *Lynch, et al. v. American Guard Services*, Los Angeles Superior Court,
9 Case No. BC462681 (appointed Class Counsel and granted final approval of class action
10 settlement on behalf of security guard employees).

11 M. *Martin, et al. v. Aukeman Dairy, et al.*, Kern Superior Court, Case No. S-
12 1500-CV-282679 (appointed Class Counsel and granted final approval of class action settlement
13 on behalf of dairy and agricultural laborers).

14 N. *Montes v. Branam Enterprises, Inc.*, Los Angeles Sup.Ct. Case No.
15 BC442608 (appointed Class Counsel and granted final approval of class action settlement on
16 behalf of call concert rigging employees).

17 O. *Nardone v. Sequoia Beverage Company, LP*, Tulare County Superior
18 Court, Case No. VCU-248370 (appointed Class Counsel and granted final approval of class action
19 settlement by the court on behalf of hourly employees).

20 P. *Ogbuehi v. Comcast of California/Colorado/Florida/Oregon, Inc.*, United
21 States District Court, Eastern District of California, Case No. EDCV13-00672-KJM-KJN
22 (appointed Class Counsel and granted final approval of class action settlement on behalf of virtual
23 customer account executives).

24 Q. *Rosen v. Image Transfer*, Los Angeles Superior Court, Case No.
25 BC511072 (appointed Class Counsel and granted final approval of class action settlement on
26 behalf of bobtail truck drivers).

27 R. *Sandoval v. Rite Aid Corp.*, Los Angeles Superior Court, Case No.
28 BC431249 (granted class certification through contested motion and appointed Class Counsel in



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1 case on behalf of former pharmacy employees based on late final wage payments in violation of
2 Labor Code §§ 201–203).

3 S. *Celeste Shaw and Dejan Nagl v. Interthinx, Inc.*, United States District
4 Court for the District of Colorado, Case No. 13-CV-01229-REB-BNB (appointed Class Counsel
5 and granted final approval of class action settlement by the court on behalf of auditor employees).

6 T. *Stucker v. L'Oreal*, Los Angeles Sup.Ct. Case No. BC456080 (appointed
7 Class Counsel and granted final approval of class action settlement involving alleged
8 misclassification of sales employees and unpaid vacation pay).

9 U. *Valdez v. Healthcare Services Group, Inc.*, Los Angeles Sup.Ct., Case No.
10 BC462917 (appointed Class Counsel and granted final approval of class action settlement on
11 behalf of service account manager employees).

12 V. *Valencia v. SCIS Air Security Corp.*, Los Angeles Superior Court, Case
13 No. BC421485 (granted class certification through contested motion and appointed Class Counsel
14 in case on behalf of former security workers based on late final wage payments in violation of
15 Labor Code §§ 201–203).

16 W. *Vang v. Burlington Coat Factory Corporation*, United States District Court
17 Central District of California, Case No. 09-CV-08061-CAS-JCx (appointed Class Counsel and
18 granted final approval of class action settlement by the court on behalf of assistant store manager
19 employees).

20 X. *Volney-Parris v. Southern California Edison Company*, Los Angeles
21 Superior Court, Case No. BC493038 (appointed Class Counsel and granted final approval of class
22 action settlement on behalf of customer specialist employees).

23 Y. *Wade and Gammel, et al. v. Defender Security Company*, Central District
24 of California, Case No. 2:15-cv-7142 CAS-JC (appointed Class Counsel and granted final
25 approval class action settlement on behalf of security technicians).

26 Z. *White v. 20/20 Communications, Inc.*, San Bernardino County Superior
27 Court, Case No. CIVRS1301718 (appointed Class Counsel and granted final approval of class
28 action settlement on behalf of sales associates).



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1 10. The Los Angeles Superior Court approved an hourly rate of \$650.00 for me, as
2 reasonable attorneys' fees in *Tucker v. Maly's West, Inc.*, Los Angeles County Superior Court,
3 Case No. BC483920 over three years ago.

4 11. Based on my knowledge, all counsel for the employees who will benefit from the
5 settlement are being paid entirely on contingency and have not been paid any attorneys' fees since
6 assuming representation of Plaintiffs. The work performed by such attorneys for the Plaintiffs
7 was extensive. Among other things, the attorneys:

- 8 • Conducted initial investigations and developed the theories and facts to support
- 9 Plaintiff's claims as to Defendant's alleged violations;
- 10 • Researched and drafted Plaintiff's complaints;
- 11 • Sought and obtained informal discovery, including, but not limited to, the
- 12 discovery such as the production of Defendant's relevant written company
- 13 policies;
- 14 • Reviewed and analyzed over one thousand pages of written policy documents,
- 15 time records, and payroll records produced by Defendant's;
- 16 • Interviewed putative class members; and
- 17 • Reviewed the settlement agreements, and declarations for final approval.
- 18
- 19
- 20

21 12. My co-counsel and I have expended time, effort, and money that I could have
22 expended on less risky cases against defendants with greater financial viability. My co-counsel
23 and I took on this representation well aware of the risks involved and with the full intention of
24 seeing it to the end, including through any appeals (and could still, in theory, have to litigate
25 appellate issues pending the outcome of this motion and the expiration of the appeals period). In
26 the face of the risks involved and the contrary authorities discussed above, we performed
27 tremendous amount of work and vigorously litigated the action *Escriba v. Communications Test*
28 *Design, Inc.*

 13. My previous experience in similar matters was integral in evaluating the strengths



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1 and weaknesses of the cases against Defendant and the reasonableness of the Settlement. Practice
2 in the narrow field of wage and hour litigation requires skill and knowledge concerning the rapidly
3 evolving substantive law, state and federal, as well as the procedural law of class action litigation.

4 14. The Spivak Law Firm has prosecuted this litigation solely on a contingent-fee
5 basis, and has been completely at risk that it would not receive any compensation for prosecuting
6 claims against the Defendant.

7 15. The hourly rate for my time is \$900.00 per hour which is my usual and
8 customary hourly rate charged for my services in similar complex class actions.

9 16. I incurred over \$6,981.74 in litigation expenses. True and correct copies of the
10 costs and expense records of my firm are collectively attached as **Exhibit A** to this declaration
11 with minor redactions to protect the confidentiality of sensitive, privileged information. I will
12 make unredacted copies of such records available to the Court for *in camera* inspection upon its
13 request.

14 17. I believe that the Settlement is fair, adequate, and reasonable. The Settlement
15 provides substantial monetary benefits to Class Members and is a product of diligent efforts of
16 Plaintiffs' Counsel to obtain the best possible result for the Class Members.

17 ***Service Payment to Class Representatives***

18 18. Finally, the Settlement provides that Plaintiffs Yazmin Cortes, Jodie Blanton, Jr.,
19 and Gabriela Escriba (collectively referred to as "Plaintiffs") may seek Service Payment to Class
20 Representatives of \$15,000.00 each.

21 19. Plaintiff Gabriela Escriba began her investigation and retention of attorneys to
22 pursue the claims at issue in approximately May 24, 2021. In this case, Plaintiff Escriba has
23 devoted several hours of her time advancing the interests of the Class Members. *See generally*
24 Declaration of Plaintiff Escriba. She has done this by, among other things, retaining experienced
25 counsel, providing them with extensive information about her work history with Defendant and
26 Defendant's policies and practices with respect to the wage and hour claims at issue, assisting
27 them in contacting absent Class Members to gather information, foregoing pursuit of her
28 individual claims in favor of a fair class-wide resolution, and being actively involved in the



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1 settlement process to ensure a fair result for the Class Members as a whole.

2 20. Plaintiff Escriba agreed to (1) consider the interests of the class just as she would
3 consider her own interests and, in some cases, to put the interests of the class before her own
4 interests; (2) actively participate in the lawsuit, as necessary, by among other things, answering
5 interrogatories, producing documents to Defendant and giving deposition and trial testimony if
6 requested; (3) travel to give such testimony if requested; (4) recognize and accept that any
7 resolution of her lawsuit by dismissal or settlement, is subject to court approval, and must be
8 designed in the best interest of the class as a whole; (5) follow the progress of the lawsuit and
9 provide all relevant facts to her Counsel; (6) champion many other people with similar claims and
10 injuries because of the importance of the case and that necessity that all Class Members benefit
11 from the lawsuits; and (7) fight for a resolution in which the individual recovery to each class
12 member, including Plaintiff Escriba, may be relatively small. Plaintiff Escriba agreed to shoulder
13 all of these responsibilities in exchange for a proportionate share of funds made available for
14 distribution to the Class Members.

15 21. In taking the actions outlined above, Plaintiff Escriba has exposed herself to
16 significant risks, including the risk that she could have been ordered to pay Defendant's attorneys'
17 fees and costs if the lawsuits have been unsuccessful (*see* Lab. Code §§ 218.5-218.6), as well as
18 the risk that she could, in the future, face a potentially hostile work environment and worsened
19 career prospects for suing a prior employer for wage and hour violations and serving as the
20 Plaintiff in a class action lawsuit. Additionally, Plaintiff has exposed herself to the risk that she
21 could end up receiving less than Defendant would have paid them at the beginning of her lawsuits
22 via a C.C.P. § 998 offer or other individual settlement offer to drop her class allegations.

23 22. Such costs awards are higher than the share of the Net Settlement Amount
24 ("NSA") that Plaintiff Escriba stand to receive as a participating Class Member. It is unfair in
25 view of the substantial risk of an adverse fee or cost award of several thousand dollars that
26 Plaintiff Escriba receive less as a reward for taking such a risk. Moreover, we cannot lose sight
27 of the fact that Plaintiff Escriba is not a high wage earner. Even the lowest of the cost awards
28 listed above would have devastating consequences for Plaintiff Escriba in view of her modest



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1 earnings.

2 23. The average putative class member in this case would be unlikely to pursue
3 individually the claims Plaintiffs brought against Defendant because such claims would be too
4 small to justify the cost and the risk. A putative class member will be unlikely to find an attorney
5 who is willing to pursue an individual's claims because the claims are too small to justify the
6 hundreds of hours of legal work necessary to prove each claim. Only the class action vehicle,
7 which allows for the aggregation of hundreds of risky small dollar value claims, makes such
8 claims advantageous for an attorney to pursue on a contingency basis and there can be no class
9 action without a class member assuming the great fiduciary responsibilities of as Named Plaintiff.
10 This court should allow the Service Payment to Class Representatives requested because to do
11 otherwise would discourage employees (and attorneys) from bringing class actions in the first
12 place.

13 24. If would-be class action plaintiffs are not adequately incentivized to advance the
14 public policy behind class actions in court in light of the time and risk it will entail, it is unlikely
15 that they will bring class action lawsuits in the first place. Once employers realize that such
16 lawsuits are unlikely, they will have no incentive to comply with wage and hour laws.

17 25. Plaintiff faced the risk that she could face worsened career prospects for suing a
18 former employer for wage and hour violations and serving as the Plaintiff in a class action lawsuit.
19 Because she filed lawsuits in the California Superior Court, a public record now exists that
20 Plaintiff sued her employer for Labor Code violations – a fact that won't be lost on prospective
21 employers considering him for a job. Common sense dictates that an employer will think twice
22 about hiring someone who sued her last employer. Legal experts have recognized this fact.
23 California even has laws to address this risk: Labor Code § 1102.5 prohibits retaliation against
24 employees who speak up about Labor Code violations and Labor Code § 98.6 prohibits
25 discrimination against employees who bring Labor Code violations to the attention of the Labor
26 Commissioner. Thus, the risk to Plaintiff future employment shows that the Service Payment to
27 Class Representatives sought are fair, adequate, and reasonable, and warrants final approval of
28 the Court.



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26. By agreeing to settle the case in the best interest of the Class Members, Plaintiff has given up the right to pursue individual claims and recover substantially more in unpaid wages, interest, waiting time penalties, pay stub penalties, and civil penalties that she will release as part of the Settlement. Plaintiff did not seek individual settlement for her claims at all, instead choosing to prosecute the claims on behalf of the Class Members.

I declare under the penalty of perjury of the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on Monday, July 31, 2023 at Los Angeles, California.

David Spivak

DAVID SPIVAK,
Declarant



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EXHIBIT A

TSLF COSTS

Date	Expense Type	Expense Description	Expense Amount
5/25/2021	Records Requests	San Bernardino Records request re MX	\$ 13.00
5/25/2021	Records Requests	San Bernardino Records Request re complaint	\$ 16.00
5/25/2021	LWDA Filing Fee	LWDA filing fee REDACTED	\$ 75.00
5/27/2021	Attorney Service-Filing	rapidlegal # REDACTED	\$ 1,581.79
6/4/2021	Postage	Postage May 2021	\$ 24.15
7/2/2021	Records Requests	21.07.02 Order Complete - Superior Court of California - County of San Bernardino	\$ 3.50
7/13/2021	Attorney Service-Filing	One Legal # REDACTED	\$ 41.18
7/14/2021	Attorney Service-Filing	One Legal Credit Card Sale# REDACTED	\$ 162.15
8/2/2021	Attorney Service-Filing	Rapid Legal Invoice # REDACTED	\$ 105.32
8/2/2021	Attorney Service-Filing	Rapid Legal Invoice# REDACTED	\$ 36.14
8/5/2021	Postage	Stamps July 2021	\$ 4.40
8/9/2021	Attorney Service-Filing	One Legal Invoice # REDACTED	\$ 30.89
8/11/2021	Records Requests	Pacer charge to check docket	\$ 0.10
8/16/2021	Attorney Service-Filing	One Legal Invoice# REDACTED	\$ 30.89
9/1/2021	Lexis or Westlaw	Lexis usage Aug 2021	\$ 163.09
9/2/2021	Attorney Service-Filing	OLC Invoice # REDACTED	\$ 14.95
10/1/2021	Records Requests	Pacer Downloads September 2021 (TSLF)	\$ 0.30
10/1/2021	Records Requests	Pacer Downloads September 2021 (DGS)	\$ 3.70
10/4/2021	Lexis or Westlaw	Lexis U	\$ 12.05
10/8/2021	Interpreter or Translation	Translating Services LLC Invoice # REDACTED	\$ 175.44
10/28/2021	Attorney Service-Filing	OLC Invoice # REDACTED	\$ 14.95
11/2/2021	Lexis or Westlaw	Lexis Usage October 2021	\$ 11.03
3/1/2022	Records Requests	Pacer Downloads February	\$ 1.10
3/15/2022	Mediator Fees	Mark Rudy mediation	\$ 2,750.00
6/7/2022	Records Requests	WebPaymentReceipt REDACTED	\$ 20.50
6/7/2022	Records Requests	WebPaymentReceipt REDACTED	\$ 12.50
6/7/2022	Records Requests	WebPaymentReceipt REDACTED	\$ 1.50
7/5/2022	Lexis or Westlaw	Westlaw usage June 2022	\$ 51.61
7/5/2022	Lexis or Westlaw	Lexis usage June 2022	\$ 5.16
10/4/2022	Lexis or Westlaw	Lexis usage Sept 2022	\$ 0.88
11/2/2022	Lexis or Westlaw	Lexis usage Oct 2022	\$ 7.41
12/2/2022	Lexis or Westlaw	Lexis usage Nov 2022	\$ 6.48
12/28/2022	Interpreter or Translation	22.12.28 Inv REDACTED from Translating_Services_LL C	\$ 1,248.29
1/3/2023	Lexis or Westlaw	Lexis Usage December 2022	\$ 7.26
1/11/2023	Postage	23.01.11 Invoice REDACTED	\$ 22.83
1/18/2023	FedEx or UPS	FedEx Invoice REDACTED	\$ 36.98
1/19/2023	Postage	23.01.19 Invoice REDACTED from Excelsior_Digital	\$ 30.06
2/2/2023	Lexis or Westlaw	Lexis Usage January 2023	\$ 7.48
3/1/2023	Lexis or Westlaw	Lexis Usage February 2023	\$ 6.50
4/3/2023	Photocopies	Lexis Usage March 2023	\$ 4.79
5/1/2023	Lexis or Westlaw	Lexis Usage April 2023	\$ 12.12
7/3/2023	Lexis or Westlaw	Lexis usage June 2023	\$ 3.27
7/31/2023	Interpreter or Translation	Inv REDACTED from Translating_Services_LL C	\$ 225.00
	TOTAL:		\$ 6,981.74