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5
6 Dennis S. Hyun (State Bar No. 224240)
HYUN LEGAL, APC
7 515 S. Figueroa St., Suite 1250
Los Angeles, California 90071
8 (213) 488-6555
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10 Attorneys for Plaintiffs and the Class

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF ORANGE**

13 RAEIGN VELASQUEZ, MIKAYLA ASEVO
14 and ERIC RIVAS on behalf of themselves and
on behalf of all persons similarly situated

15 Plaintiffs,

16 v.

17 TEAM BLAZE, a California Corporation;
18 GHOLAMREZA MEDALI, an individual; and
19 DOES 1 to 100, inclusive,

20 Defendants.

Case No. 30-2021-01187932-CU-OE-CXC

[Assigned for all purposes to the Hon. Melissa
R. McCormick, Dept. CX104]

**DECLARATION OF ZACK
BROSLAVSKY IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
REPRESENTATIVE SETTLEMENT**

Date: May 8, 2025
Time: 2:00 p.m.
Dept.: CX104

Complaint Filed: March 9, 2021
Trial Date: Not set

1 I, Zack Broslavsky, hereby declare and state as follows:

2 1. I am an attorney admitted to practice before the courts of the State of California. I
3 am a principal and founding partner of Broslavsky & Weinman, LLP, one of the attorneys of
4 record for Plaintiffs Raeign Velasquez, Mikayla Asevo, and Eric Rivas (collectively,
5 “Plaintiffs”), in the above-entitled action.

6 2. I have personal knowledge of the matters set forth herein, and if called upon as a
7 witness to testify thereto, I could and would competently do so.

8 3. I graduated from UCLA School of Law in 2006. Between 2006 and 2013, I was a
9 litigation associate at Rutan & Tucker. The cases I’ve worked on covered many different areas
10 of law, ranging from contract to intellectual property to insurance to class actions defense. The
11 class actions I worked on at Rutan included *Kershenbaum v. Buy.com*, Orange County Sup. Ct.
12 Case No. 07CC01336, *Munn vs. Eastwood Insurance Services, Inc.*, Orange County Sup. Ct.
13 Case No. 06CC00110, and *Franklin v. Brown & Brown of California, Inc.*, Orange County Sup.
14 Ct. Case No. 30-2011-00502219-CU-BT-CXC.

15 4. I left Rutan in late 2013 to co-found Broslavsky & Weinman, LLP. The bulk of
16 our practice consists of representing plaintiffs in employment matters, including discrimination,
17 harassment, retaliation, whistleblower, and wage and hour claims. We have litigated in San
18 Bernardino Superior Court, Los Angeles Superior Court, Riverside Superior Court, Orange
19 County Superior Court, San Francisco Superior Court, California Central District Court,
20 California Eastern District Court, and California Court of Appeal.

21 5. Mr. Weinman and I were trial co-counsel in the matter of *Whitfield v.*
22 *Broadspectrum Downstream Services, Inc., et al.*, Los Angeles Sup. Ct. Case No. BC632479,
23 where plaintiff was awarded a total of \$826,877.83, including punitive damages, on a single
24 cause of action for retaliation where plaintiff still remained employed. We were also trial co-
25 counsel in the matter of *Kukreja v. Dedication and Everlasting Love to Animals*, Los Angeles
26 Sup. Ct. Case No. BC532962, where plaintiff was awarded \$148,832.77 on a
27 challenging disability discrimination claim. On matters that did not go to trial, we reached what
28 we believe were fair and equitable settlements in the overwhelming majority of the cases,

1 including a substantial resolution in a multi-plaintiff Complex designated employment matter,
2 entitled *Swanger v. Stater Bros. Markets, et al.*, San Bernardino Sup. Ct. Case No.
3 CIVDS1707999.

4 6. While the majority of my time has been spent on individual employment claims, I
5 have also done substantial class action work. I was certified as class counsel in *Cosio v.*
6 *International Performing Arts Academy LLC et al.*, San Francisco Sup. Ct. Case No.
7 CGC16551337, *Smith et al. v. HR Direct, Services et al.*, San Bernardino County Sup. Ct. Case
8 No. CIVDS1901660, and *Salas et. al. v. J&S Restaurants, Inc. et. al.*, Ventura County Sup. Ct.
9 Case No. 56-2019-00526959-CU-OE-VTA. I am also class counsel in the currently pending
10 class actions of *Lomeli, et al. v. SeaWorld Parks and Entertainment, Inc. et al.*, San Diego Sup.
11 Ct. Case No. 37-2023-00008-529-CU-BT-CTL (preliminary approval hearing of a class
12 settlement on April 18, 2025) and *Gatling-Lee, Libby et al. vs. Del Monte Foods, Inc.*, N. Dist.
13 Cal. Case No. 4:22-cv-00892-JST.

14 7. All sides have apprised the other of their respective factual contentions, legal
15 theories and defenses, and engaged in extensive arms' length negotiations. Based on their own
16 independent investigation and evaluation, the Parties and their counsel believe that the
17 Settlement for the consideration and on the terms set forth in the Class and Representative
18 Action Settlement Agreement is fair, reasonable, and adequate and the settlement is in the best
19 interests of the Class and Defendants in light of all known facts and the expenses and risks
20 inherent in litigation.

21 8. The attorney's fees are being split 50/50 between Hyun Legal, APC and
22 Broslavsky & Weinman LLP. To date, I have incurred approximately 146.7 hours in connection
23 with the litigation of this lawsuit. A true and correct copy of a breakdown of these hours is
24 attached hereto as **Exhibit 1**.

25 9. My current billing rate is seven hundred dollars (\$700.00) per hour. In 2022, in
26 *Salas et. al. v. J&S Restaurants, Inc. et. al.*, the Court approved my then requested rate of six
27 hundred dollars (\$600.00). The rate of \$700.00 per hour is below the mid-range of the rates for
28 attorneys in the area with similar levels of experience. As such, my attorney's fees are \$102,690.

10. My office has incurred \$13,450.21 in costs, a true and correct breakdown of which is attached hereto as **Exhibit 2**. Attached hereto as **Exhibit 3** are true and correct copies of the two invoices from EconOne for expert services. The January 1, 2022 invoice was split 50/50 between Hyun Legal, APC and my firm. The February 28, 2022 invoice was paid solely by my firm. Attached hereto as **Exhibit 4** is a true and correct copy of the invoice from Judicate West for Judge Denton's mediation fee, which was split 50/50 between Hyun Legal and my office. Attached hereto as **Exhibit 5** are true and correct copies of the two invoices from Matson & Driscoll for forensic analysis. These invoices were split 50/50 between Plaintiffs and Defendants and then Plaintiffs' share was split 50/50 between Hyun Legal and my firm. As reflected in the November 30, 2022 invoice, Plaintiffs also previously paid a \$5,000.00 retainer, which was also split 50/50 between Hyun Legal and my firm.

11. After a reasonably inquiry, I am not aware of related pending actions or other cases that may be impacted by this settlement.

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

Executed on April 12, 2025, at Los Angeles, California.

Zack Broslavsky
Zack Broslavsky

Exhibit 1

VELASQUEZ v. BLAZE – BW COST SHEET				
Case No. 30-2021-01221399-CU-OE-CXC				
<u>Payment Date</u>	<u>Cost</u>	<u>Memo</u>	<u>Company</u>	<u>Payment Method</u>
1/10/2022	\$2,325.00	Mediation Fee	Judicate West	CC
3/25/2022	\$2,664.02	Expert Fees	EconOne	Chk 1507
4/14/2022	\$219.92	Expert Fees	EconOne	Chk 1513
8/22/2022	\$2,500.00	Forensic Analysis Retainer	Matson Driscoll	Chk 1533
12/22/2022	\$3,284.20	Forensic Analysis Fees	Matson Driscoll	Chk 1544
2/3/2023	\$15.39	CMC Filing Fee	OneLegal	CC
8/13/2023	\$2,417.80	Forensic Analysis Fees	Matson Driscoll	Chk 1566
8/16/2024	\$23.88	Preliminary Approval Supplemental Papers Filing Fees	OneLegal	CC

\$13,450.21

Exhibit 2

VELASQUEZ V. BLAZE - ZACK BROSLAVSKY HOURS

Description of Task

Confer with Asevo about potential case	1.7
Review documents sent by Asevo	3.1
Legal research re potential claims	3.4
Confer with Velasquez about potential case	1.4
Review documents sent by Velasquez	0.7
Confer with Rivas about potential case	1.5
Review documents sent by Rivas	1.4
Confer with other witnesses about potential case	2.1
Draft complaint	3.1
Draft PAGA letter for Velasquez	1.5
Draft PAGA letter for Asevo	0.6
Draft PAGA letter for Rivas	0.6
Prepare CMC statement (July 2, 2021 hearing)	1.5
Confer with Mr. Atoyan re: CMC statement and Defendants' contentions	0.8
Review signed arbitration agreements produced by Defendants	0.3
Research re enforceability of the produced arbitration agreements	1.6
Draft requests for production to Blaze	0.7
Draft requests for production to Medali	0.4
Draft special interrogatories to Blaze	0.5
Prepare Joint CMC statement (October 29, 2021 hearing)	0.4
Communications with Vasquez and review additional documents provided	9.8
Communications with Asevo and review additional documents provided	6.8
Communications with Rivas and review additional documents provided	6.4
Confer with witness Phoebe Chue and draft her declaration for the mediation	3.4
Confer with witness Lindsey Vasquez and draft her declaration for the mediation	2.7
Prepare mediation brief	15.1
Review Defendants' mediation brief and research rebuttal of defenses	5.9
Review expert damages analyses	0.7
Follow up communications with expert re damages analysis	1.4
Attend mediation	6.5
Email exchanges with opposing counsel post mediation re financial hardship argument	2.1
Prepare Joint CMC statement (March 4, 2022 hearing)	0.5
Conference call with opposing counsel and mediator	0.6
Vetting potential third party neutrals to perform forensic analysis	4.3
Prepare Joint CMC statement (July 8, 2022 hearing)	0.4
Conference call with opposing counsel re parameters of forensic analysis	1.4
Revise retainer agreement with Matson; confer with opposing counsel re same	1.2
Review Matson Driscoll's preliminary analysis (October 7, 2022)	1.3
Conference call with opposing counsel and Matson Driscoll re prelim. analysis	1.8
Review Matson Driscoll's updated analysis (January 18, 2023)	1.5
Prepare Joint CMC statement (February 10, 2023 hearing)	1.7
Conference calls with opposing counsel and Matson Driscoll re updated. analysis	2.4
Prepare Joint CMC statement (May 19, 2023 hearing)	1.5
Conference calls with opposing counsel re settlement	3.7
Prepare Joint CMC statement (August 18, 2023 hearing)	0.9

Revisions to settlement agreement and conf. with opposing counsel re same	2.4
Draft declarations of Vasquez, Asevo and Rivas re preliminary approval	1.1
Draft motion for preliminary approval	6.1
Draft declaration ISO preliminary approval	2.4
Revise proposed order for preliminary approval per the Court's minute order (January 11, 2024)	1.2
Draft settlement addendum per the Court's minute order (January 11, 2024)	1.1
Revise class notice per the Court's minute order (January 11, 2024)	0.6
Confer with opposing counsel re declarations of Medali and Atoyan per the Court's minute order	1.3
Confer with class administrator re Spanish translation for class notice	0.2
Attend hearing re court's tentative on April 25, 2024	1.6
Revise class notice per the Court's minute order (April 25, 2024)	0.5
Revise addendum per the Court's minute order (April 25, 2024)	1.4
Revise proposed order per the Court's minute order (April 25, 2024)	0.4
Prepare supplemental declaration per the Court's minute order (April 25, 2024)	0.3
Revise class notice per the Court's minute order (August 29, 2024)	1.1
Revise addendum per the Court's minute order (August 29, 2024)	1.3
Draft motion for final approval	7.8
Draft declaration in support of final approval	2.1
Draft declarations of Vasquez, Asevo and Rivas ISO final approval	2.5
	146.7

Exhibit 3

INVOICE #
21287
Issue Date

1/31/2022

Billing Period

1/1/2022 - 1/31/2022

To

Dennis S. Hyun, Esq.
Hyun Legal
550 South Hope Street
Suite 2655
Los Angeles, CA 90071

Via Email

dhyun@hyunlegal.com

IN RE:

Page 1 of 2

**Raeign Velasquez, Mikayla Asevo, and Eric Rivas v. Team Blaze,
Gholamreza Medali**

Professional Services	Total	
Data Processing/Programming	\$	2,052.00
Project Supervision/Management		997.50
Auditing		918.00
Issue Research/Analysis		828.00
Data Entry		549.50
Communication with Client/Counsel		85.50
Subtotal for Professional Services	\$	5,430.50

Out-of-pocket Expenses	Total	
Data Expenses	\$	177.97
Subtotal for Out-of-pocket Expenses	\$	177.97

Total Due \$ 5,608.47
If Paid Within 30 Days, Total Due \$ 5,328.05
PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW*
Payment information:

Pacific Western Bank
ABA Routing # [REDACTED]
SWIFT Code [REDACTED]
Account # [REDACTED]
Beneficiary: Econ One Research

If wire and ACH not possible, please remit check to:

Econ One Research
550 South Hope Street, Suite 800
Los Angeles, CA 90071

Federal Taxpayer ID # 95-4639689

**When paying via Wire or ACH, please also email receivables@econone.com indicating amount being transferred and the invoice(s) being paid.*

IN RE:

Raeign Velasquez, Mikayla Asevo, and Eric Rivas v. Team Blaze, Gholamreza Medali



Name	Title	Rate	Hours	Description
Data Processing/Programming				
Daniel, M.	Consultant	\$ 285	0.5	STATA data handling/preparation for analysis
Daniel, M.	Consultant	285	6.7	STATA data import and cleaning
Project Supervision/Management				
Daniel, M.	Consultant	285	3.5	Project planning and supervision
Auditing				
Mishra, K.	Senior Analyst	145	0.4	Audited data entry
Chopra, M.	Analyst	130	6.0	Audited data entry
Kumar, R.	Research Support	40	2.0	Audited data entry
Kumar, R.	Research Support	40	2.0	Audited data entry
Issue Research/Analysis				
Daniel, M.	Consultant	285	2.8	STATA data analysis/programming
Chakrabarti, S.	Economist	150	0.2	Issue research/analysis
Data Entry				
Mishra, K.	Senior Analyst	145	1.1	Data entry
Chopra, M.	Analyst	130	3.0	Data entry
Communication with Client/Counsel				
Daniel, M.	Consultant	285	0.3	Telephone call with counsel/client

INVOICE #
21518-2
Issue Date

2/28/2022

Billing Period

2/1/2022 - 2/28/2022

To

Zack Broslovsky, Esq.
Jonathan A. Weinman, Esq.
Broslovsky & Weinman, LLP
1500 Rosecrans Ave., Suite 500
Manhattan Beach, CA 90266

Via Email

zbroslovsky@bwcounsel.com
jweinman@bwcounsel.com

IN RE:

Page 1 of 2

**Raeign Velasquez, Mikayla Asevo, and Eric Rivas v. Team Blaze,
Gholamreza Medali**

Professional Services
Total

Issue Research/Analysis	\$	285.00
Subtotal for Professional Services	\$	285.00

Out-of-pocket Expenses
Total

Data Expenses	\$	177.97
Subtotal for Out-of-pocket Expenses	\$	177.97
5% Discount for Prepayment	\$	(23.15)
Credit for Prepayment	\$	23.15

Total Due \$ 462.97
50% Share Applicable to Client \$ 231.49
If Paid Within 30 Days, Total Due \$ 219.92
PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW*
Payment information:

Pacific Western Bank
ABA Routing #: XXXXXXXXXX
SWIFT Code: XXXXXXXXXX
Account #: XXXXXXXXXX
Beneficiary: Econ One Research

If wire and ACH not possible, please remit check to:

Econ One Research
550 South Hope Street, Suite 800
Los Angeles, CA 90071

Federal Taxpayer ID # 95-4639689

**When paying via Wire or ACH, please also email receivables@econone.com indicating amount being transferred and the invoice(s) being paid.*

IN RE:

Raeign Velasquez, Mikayla Asevo, and Eric Rivas v. Team Blaze, Gholamreza Medali



Name	Title	Rate	Hours	Description
Issue Research/Analysis				
Daniel, M.	Consultant	\$ 285	1.0	STATA data analysis/programming

Exhibit 4

INVOICE
Due Upon Receipt

Dennis S. Hyun, Esq.
Hyun Legal, APC
515 S. Figueroa St.
Suite 1250
Los Angeles, CA 90071

Invoice Number: 544154
Invoice Date: 10/4/2021
JW Case: A282749
Case Manager: Calina Gercke

Raeign Velasquez, et al. vs. Team Blaze, Inc., et al.
Neutral: Hon. Steven R. Denton, Ret.

Description	Hours	Rate	Fee	Share	Total
Case Management Fee	-	\$250.00	\$250.00	-	\$250.00
Full Day Rate - 2/10/2022	-	\$880.00	\$8,800.00	1/2	\$4,400.00
Please Note:			Total Due Now:		\$4,650.00
FULL DAY RATE: Covers a maximum 10 hours of time inclusive of review/preparation. Any additional time will be billed at the mediator's hourly rate of \$880.					

Remittance Instructions:

Please reference invoice 544154 on your check made payable to Judicate West and mail to
1851 East First Street, Suite 1600, Santa Ana, CA 92705.

To pay online via ACH or credit card please visit: www.judicategwest.com/MyJW/QuickPay

JW's Tax ID: 33-0626684. JW's W-9 is available online at www.JudicateWest.com/Resources/Forms

Invoices are due upon receipt to secure your reserved date(s).

Any retainers billed are for additional time required including, but not limited to, review, preparation, and/or post session neutral services. Any unused retainer will be refunded. Please refer to your Services Agreement or Neutral Fee Schedule for information regarding cancellation/continuance deadlines.
All filing fees and the initial case management fee are non-refundable.

Thank you for choosing Judicate West

Downtown Los Angeles Office • 601 S. Figueroa Street Suite 3400 • Los Angeles, CA 90017 • (213) 223-1113 • Fax (213) 223-1114
Sacramento Office • 980 9th Street Suite 2200 • Sacramento, CA 95814 • (916) 394-8490 • Fax (916) 394-8495
San Diego Office • 402 W. Broadway Suite 2400 • San Diego, CA 92101 • (619) 814-1966 • Fax (619) 814-1967
San Francisco Office • 100 Pine Street Suite 1950 • San Francisco, CA 94111 • (415) 266-1242 • Fax (415) 266-1242
West Los Angeles Office • 11601 Wilshire Blvd Suite 2040 • Los Angeles, CA 90025 • (310) 442-2100 • Fax (310) 442-2125

Exhibit 5



MATSON DRISCOLL & DAMICO LLP
Certified Public Accountants

399 Market Street, Suite 300 . Philadelphia, PA 19106

T 617.426.1551 **F** 617.426.6023 **W** mdd.com

November 30, 2022

Invoice No.: 19202200360

MDD Project Number: LOSA-42862-22

Attorneys for Plaintiff and Class:

Zack Broslavsky (State Bar No. 241736)
Jonathan A. Weinman (State Bar No. 256553)
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Dennis S. Hyun (State Bar No. 224240)
HYUN LEGAL, APC
515 S. Figueroa St., Suite 1250
Los Angeles, California 90071

Attorneys for Defendants:

Michael J. O'Connor, Jr. (State Bar No. 202734)
Sarkis A. Atoyan (State Bar No. 309618)
ATKINSON, ANDELSON, LOYA, RUUD & ROMO
201 South Lake Avenue, Suite 300
Pasadena, California 91101

RE: Velasquez v. Team Blaze

Location: Orange County, CA
Date of Incident: 10/29/2021
Case No: 30-2021-01187932-CU-OE-CXC

Professional Services through November 12, 2022

Fee	\$ 23,136.80
Retainer Applied for Attorneys for Plaintiff and Class	\$ -5,000.00
Retainer Applied for Attorneys for Defendants	\$ -5,000.00
Total this Invoice	<u>\$ 13,136.80</u>

Apportionment Schedule

<u>Company</u>	<u>Apportionment</u>	<u>File Number</u>	<u>Amount Due</u>
Broslavsky & Weinman, LLP / Hyun Legal	50.00%		\$ 6,568.40
Atkinson, Andelson, Loya Ruud & Romo	50.00%		\$ 6,568.40

Billing Backup

Project: LOSA-42862-22

Invoice 19202200360 - Dated 11/30/2022

Professional Personnel

Partner		Hours	Rate	Amount
Karl Ehler				
08/17/2022	6039 - L-Analysis of tax returns Tax returns and general ledgers.	0.50	340.00	170.00
08/18/2022	6039 - L-Analysis of tax returns General ledgers.	0.30	340.00	102.00
08/18/2022	4009 - B-Analysis of financial records Email to clients regarding missing financial information.	0.10	340.00	34.00
08/19/2022	6039 - L-Analysis of tax returns General ledgers, tax returns, cash flow.	1.00	340.00	340.00
08/22/2022	4009 - B-Analysis of financial records General ledgers, bank statements, cash flow.	0.50	340.00	170.00
08/24/2022	4009 - B-Analysis of financial records General ledgers, bank statements, cash flow.	0.50	340.00	170.00
08/24/2022	2006 - G-Preparation of correspondence/e-mail Email to clients regarding source documentation rec'd to date.	0.10	340.00	34.00
08/26/2022	4009 - B-Analysis of financial records General ledgers, bank statements, cash flow.	0.30	340.00	102.00
09/01/2022	4009 - B-Analysis of financial records	0.30	340.00	102.00
09/01/2022	6040 - L-Telephone Conference with Attorney	0.50	340.00	170.00
10/05/2022	2016 - G-Prepare preliminary schedules Cash available for distribution.	0.60	340.00	204.00
10/05/2022	6022 - L-Analysis of financial statements Team Blaze income statements, cash flow statements.	0.80	340.00	272.00
10/05/2022	6028 - L-Analysis of cash flow from operations Team Blaze operations.	1.40	340.00	476.00
10/05/2022	6039 - L-Analysis of tax returns Team Blaze.	0.70	340.00	238.00
10/06/2022	6028 - L-Analysis of cash flow from operations Team Blaze operations.	1.10	340.00	374.00
10/06/2022	6022 - L-Analysis of financial statements Team Blaze income statements, cash flow statements.	0.60	340.00	204.00
10/06/2022	6039 - L-Analysis of tax returns Team Blaze.	0.40	340.00	136.00
10/07/2022	6022 - L-Analysis of financial statements Team Blaze income statements, cash flow statements.	1.60	340.00	544.00
10/07/2022	6028 - L-Analysis of cash flow from operations Team Blaze operations.	1.00	340.00	340.00
10/07/2022	6039 - L-Analysis of tax returns Team Blaze.	0.60	340.00	204.00
10/07/2022	2006 - G-Preparation of correspondence/e-mail Email to clients regarding preliminary analysis.	0.20	340.00	68.00
10/07/2022	2016 - G-Prepare preliminary schedules Cash available for distribution.	0.70	340.00	238.00
10/19/2022	2005 - G-Telephone conference with client Phone with S. Atoyan regarding conference call reschedule.	0.10	340.00	34.00
11/02/2022	6040 - L-Telephone Conference with Attorney To review preliminary analysis.	0.90	340.00	306.00
11/02/2022	6022 - L-Analysis of financial statements	0.40	340.00	136.00

Cash flow statements, general ledgers.

Total - Karl Ehler	15.20	\$ 5,168.00
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Manager

Nathaniel Curtis

08/18/2022	2033 - G-Research of case background	0.40	264.00	105.60
08/19/2022	2034 - G-Examination of contracts/documents	0.50	264.00	132.00
08/19/2022	2011 - G-Preparation of document request	0.90	264.00	237.60
08/19/2022	2013 - G-Review progress of assignment	0.30	264.00	79.20
08/31/2022	2006 - G-Preparation of correspondence/e-mail Prepare agenda and topics for call with clients.	0.60	264.00	158.40
09/01/2022	2000 - G-Conference with client Meet with clients.	0.80	264.00	211.20
09/13/2022	2008 - G-Preliminary claim analysis Prepare model outline and project plan relying on existing documents.	1.10	264.00	290.40
09/14/2022	2010 - G-Planning assignment Prepare for and meet with team to make project assignments and set deadlines.	0.70	264.00	184.80
09/16/2022	2008 - G-Preliminary claim analysis Brief Karl on project plan and timeline.	0.30	264.00	79.20
09/19/2022	2008 - G-Preliminary claim analysis Examine progress on model	0.40	264.00	105.60
09/23/2022	2008 - G-Preliminary claim analysis Review model progress and meet with team.	0.70	264.00	184.80
09/26/2022	2017 - G-Preparation of report schedules Build payment model scenarios	2.60	264.00	686.40
09/27/2022	2017 - G-Preparation of report schedules	1.60	264.00	422.40
09/28/2022	2017 - G-Preparation of report schedules	2.20	264.00	580.80
09/29/2022	2017 - G-Preparation of report schedules	2.60	264.00	686.40
09/29/2022	2018 - G-Preparation of report narrative	0.80	264.00	211.20
10/03/2022	2024 - G-Report and schedule checking	2.90	264.00	765.60
10/03/2022	2017 - G-Preparation of report schedules	2.40	264.00	633.60
10/04/2022	2017 - G-Preparation of report schedules	2.00	264.00	528.00
10/04/2022	2020 - G-Prepare financial condition analysis	2.70	264.00	712.80
10/05/2022	2020 - G-Prepare financial condition analysis	1.50	264.00	396.00
10/05/2022	2024 - G-Report and schedule checking	1.40	264.00	369.60
10/05/2022	2042 - G-Review of report and schedules	2.20	264.00	580.80
10/05/2022	2017 - G-Preparation of report schedules	1.30	264.00	343.20
10/06/2022	2017 - G-Preparation of report schedules	1.10	264.00	290.40
10/06/2022	2042 - G-Review of report and schedules	2.50	264.00	660.00
10/06/2022	2024 - G-Report and schedule checking	0.70	264.00	184.80
10/06/2022	2020 - G-Prepare financial condition analysis	1.30	264.00	343.20
10/07/2022	2017 - G-Preparation of report schedules	0.50	264.00	132.00
10/07/2022	2020 - G-Prepare financial condition analysis	0.40	264.00	105.60
10/07/2022	2024 - G-Report and schedule checking	1.90	264.00	501.60
10/07/2022	2042 - G-Review of report and schedules	1.20	264.00	316.80
10/17/2022	2023 - G-Read & evaluate correspondence/reports Review analysis and respond to communications.	0.40	264.00	105.60
10/20/2022	2023 - G-Read & evaluate correspondence/reports Read and respond to email communications. as needed. Review work product in preparation for meeting.	0.20	264.00	52.80
10/25/2022	2020 - G-Prepare financial condition analysis Prepare for meeting with clients and respond to emails.	0.70	264.00	184.80

Project	LOSA-42862-22	Invoice 19202200360 - Dated 11/30/2022		
11/02/2022	2005 - G-Telephone conference with client	0.80	264.00	211.20
	Call with parties to discuss preliminary analysis.			
11/02/2022	2024 - G-Report and schedule checking	0.70	264.00	184.80
	Review schedules to prepare for call with parties.			
	Total - Nathaniel Curtis	45.30		\$ 11,959.20
Staff Accountant				
Marianne Guballa				
10/06/2022	2016 - G-Prepare preliminary schedules	0.80	162.00	129.60
	Update of notes and calculation			
	Total - Marianne Guballa	0.80		\$ 129.60
Para Professional				
Laura Chen				
08/17/2022	2007 - G-Examination of documents	1.50	112.00	168.00
08/18/2022	6039 - L-Analysis of tax returns	2.50	112.00	280.00
08/19/2022	2007 - G-Examination of documents	0.50	112.00	56.00
08/22/2022	6023 - L-Analysis of bank statements	8.00	112.00	896.00
08/23/2022	6023 - L-Analysis of bank statements	3.00	112.00	336.00
09/15/2022	2002 - G-Conference	0.50	112.00	56.00
09/22/2022	6028 - L-Analysis of cash flow from operations	8.00	112.00	896.00
09/23/2022	6028 - L-Analysis of cash flow from operations	5.00	112.00	560.00
09/30/2022	6023 - L-Analysis of bank statements	5.00	112.00	560.00
	analysis of transfer amounts to unknown bank accounts			
10/03/2022	6023 - L-Analysis of bank statements	8.00	112.00	896.00
10/04/2022	6023 - L-Analysis of bank statements	6.50	112.00	728.00
10/06/2022	6023 - L-Analysis of bank statements	4.00	112.00	448.00
	Total - Laura Chen	52.50		\$ 5,880.00
Total Labor		113.80		\$ 23,136.80
Total This Report				\$ 23,136.80
Retainer Applied				\$ -5,000.00
Total This Invoice				\$ 13,136.80



FORENSIC ACCOUNTANTS

MATSON DRISCOLL & DAMICO LLP

Certified Public Accountants

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T 617.426.1551 **F** 617.426.6023 **W** mdd.com

FEIN: 36-3799916

April 11, 2023

Invoice No.: 19202300094

MDD Project Number: LOSA-42862-22

Banking Information:

Bank of America

Account # [REDACTED]

Routing # (US) [REDACTED] 3

Swift Code: [REDACTED]

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RE: Velasquez v. Team Blaze

Location: Orange County, CA

Date of Incident: 10/29/2021

Case No: 30-2021-01187932-CU-OE-CXC

Professional Services through March 25, 2023

Fee **\$ 9,671.20**

Total this Invoice **\$ 9,671.20**

Apportionment Schedule

<u>Company</u>	<u>Apportionment</u>	<u>File Number</u>	<u>Amount Due</u>
Broslavsky & Weinman, LLP / Hyun Legal	50.00%		\$ 4,835.60
Atkinson, Andelson, Loya Ruud & Romo	50.00%		\$ 4,835.60

Billing Backup

Project: LOSA-42862-22

Invoice 19202300094 - Dated 04/11/2023

Professional Personnel

		Hours	Rate	Amount
Partner				
Karl Ehlert				
01/13/2023	2033 - G-Research of case background PPP loan receipts and forgiveness.	1.40	347.00	485.80
01/16/2023	2016 - G-Prepare preliminary schedules Available cash analysis.	0.60	347.00	208.20
01/16/2023	6028 - L-Analysis of cash flow from operations Team Blaze (2019 - 2022).	1.60	347.00	555.20
01/16/2023	4009 - B-Analysis of financial records Team Blaze general ledgers (2019 - 2022).	1.20	347.00	416.40
01/17/2023	4009 - B-Analysis of financial records Team Blaze general ledgers (2019 - 2022); financial statements; cash flow.	1.40	347.00	485.80
01/17/2023	6028 - L-Analysis of cash flow from operations Team Blaze (2019 - 2022).	1.10	347.00	381.70
01/17/2023	2016 - G-Prepare preliminary schedules Available cash analysis.	0.80	347.00	277.60
01/18/2023	4009 - B-Analysis of financial records General ledgers, bank statements, credit card payments, loans.	1.70	347.00	589.90
02/03/2023	6024 - L-Analysis of liabilities PPP loan data.	0.70	347.00	242.90
02/10/2023	6024 - L-Analysis of liabilities Manufacturers Bank Loan information.	0.80	347.00	277.60
02/22/2023	6029 - L-Review of loan obligations and payment	0.30	347.00	104.10
02/27/2023	2006 - G-Preparation of correspondence/e-mail Email to attorneys regarding analysis update.	0.10	347.00	34.70
02/27/2023	6029 - L-Review of loan obligations and payment MFG Bank and SBA loans.	1.00	347.00	347.00
03/08/2023	2006 - G-Preparation of correspondence/e-mail Email to clients regarding loan documentation.	0.40	347.00	138.80
03/08/2023	6024 - L-Analysis of liabilities Loan agreements, loan statements, loans posted to general ledgers.	1.70	347.00	589.90
03/20/2023	2006 - G-Preparation of correspondence/e-mail Email to clients regarding Mfg Bank loans.	0.20	347.00	69.40
03/20/2023	6024 - L-Analysis of liabilities Mfg Bank and SBA loans.	0.40	347.00	138.80
03/24/2023	2005 - G-Telephone conference with client Phone with attorneys to discuss Mfg. Bank loan impact.	0.20	347.00	69.40
Total - Karl Ehlert		15.60		\$ 5,413.20

Para Professional

Laura Chen

12/06/2022	6023 - L-Analysis of bank statements	4.00	112.00	448.00
12/12/2022	6023 - L-Analysis of bank statements	0.50	112.00	56.00
12/13/2022	6023 - L-Analysis of bank statements	4.00	112.00	448.00
01/10/2023	6023 - L-Analysis of bank statements	4.00	114.00	456.00
01/11/2023	6023 - L-Analysis of bank statements	4.00	114.00	456.00
01/12/2023	6023 - L-Analysis of bank statements	8.00	114.00	912.00
01/16/2023	6023 - L-Analysis of bank statements	8.00	114.00	912.00

Project		Invoice 19202300094 - Dated 04/11/2023		
LOSA-42862-22				
01/17/2023	6023 - L-Analysis of bank statements	3.00	114.00	342.00
01/18/2023	6023 - L-Analysis of bank statements	2.00	114.00	228.00
Total - Laura Chen		37.50		\$ 4,258.00
Total Labor		53.10		\$ 9,671.20
		Total This Report		\$ 9,671.20
		Total This Invoice		\$ 9,671.20