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Attorneys for Plaintiff and the aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

CRISTINA GUZMAN, an individual, on
behalf of herself and others similarly situated,

PLAINTIFF,

v.

RANDSTAD US, LLC; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

Case No. 21CV380800

[Case Assigned for All Purposes to Hon.
Theodore C. Zayner in Dept. 19]

**SUPPLEMENTAL DECLARATION OF
KELSEY M. SZAMET IN SUPPORT OF
MOTION FOR APPROVAL OF
REPRESENTATIVE ACTION
SETTLEMENT AND MOTION FOR
ATTORNEYS' FEES**

Date: October 23, 2024

Time: 1:30 PM

Dept.: 19

Complaint Filed: April 28, 2021

Trial Date: None Set

1 **SUPPLEMENTAL DECLARATION OF KELSEY M. SZAMET**

2 I, Kelsey M. Szamet, state and declare as follows:

3 1. I am an attorney admitted before all courts of the State of California and a partner
4 in the law firm of Kingsley & Kingsley, APC, counsel of record for Plaintiff in this action. I am
5 completely familiar with the present litigation, including the pleadings, discovery, and filings
6 submitted in this matter. I make this supplemental Declaration from my own personal knowledge,
7 and, if called upon, I could and would competently testify to the following.

8 2. I graduated cum laude from the University of California, San Diego in 2004 with a
9 degree in Human Development. I graduated from the University of California, Los Angeles
10 School of Law in 2008. I am admitted to practice before the following Courts: United States
11 Supreme Court; United States District Court, Northern, Eastern, Southern and Central of
12 California; all California State Courts.

13 3. I make this supplemental Declaration in support of Plaintiff's Motion for Approval
14 of Representative Action Settlement and Motion for Attorneys' Fees in the above-captioned case
15 and in response to the Court's September 18, 2024, Tentative Ruling ("TR") ordering Plaintiff to
16 address various issues listed on the addendum (checklist).

17 4. I have carefully reviewed the TR and address each point herein.

18 **Escalator Clause**

19 5. The determination of whether an individual does indeed meet the definition and
20 qualify as an "Aggrieved Employee" occurs once the data is sent to the third-party administrator
21 and the end date of the Release Period is finalized.

22 6. Because this is a PAGA Action, an individual would not receive notice of the
23 PAGA Settlement until after the end date of the Release Period is finalized so there is no threat
24 of an otherwise eligible Aggrieved Employees could be eliminated from the recovery should
25 Defendant elect to change the end date of the Release Period.

26 7. As such, individuals will only receive notice of the PAGA Settlement once they
27 have been confirmed to be an Aggrieved Employee.

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Plaintiff's Individual Settlement Amount (Excluding Enhancement Request)

10. My office has contacted the clerk to determine the best way to submit a copy of the individual settlement agreement signed by Plaintiff to the Court as the document is designated confidential.

1. Attached hereto as Exhibit “1” is a true and correct copy of Plaintiff’s contemporaneous time records reflecting the timekeeper, date of work, task, and time spent on each task.

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

Kelsey M. Szamet

EXHIBIT "1"

Guzman, Cristina

Select what goes on invoice

	AMOUNT	DETAIL
☒ Billable Time	\$118,255.00	157.9 h
Total	\$118,255.00	

User Totals

	BILLABLE	AMOUNT
Eric Kingsley	20.1 h	\$22,110.00
Kelsey Szamet	98.0 h	\$78,400.00
David Penner	3.3 h	\$1,320.00
Jessi Bulaon	36.5 h	\$16,425.00

Unbilled Time

DATE	MATTER	USER	DESCRIPTION	HOURS
04/01/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	rvw initial intake notes from team	0.2
04/01/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	detailed intake with client; draft intake notes; rvw client docs; [REDACTED]	4.5
04/02/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	rvw draft retainer; follow up to client re retainer; rvw signed retainer	0.5
04/05/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	outline complaint	0.4
04/08/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails form team re [REDACTED]	0.2
04/26/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft complaint and PAGA letter	2.5

DATE	MATTER	USER	DESCRIPTION	HOURS
04/26/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw client file and docs; intake notes from EBK; new client form	1.5
04/27/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	refview notice of cmc	0.1
04/27/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	calendar LWDA letter	0.1
04/27/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	final review of docs and coordinate S&C filing with team today	0.4
04/28/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	service of order deeming case complex; rvw same; send to team for case file	0.3
04/28/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 emails to/from [REDACTED] and KMS re sending S&C out for service	0.2
04/28/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	service email of civil lawsuit notice	0.1
04/28/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw LWDA fling conf	0.1
04/28/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form [REDACTED] re initial cmc set	0.1
05/01/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	case status meeting with ebk and kms	0.3
05/01/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	case status meeting with ebk and kms	0.3
05/03/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw and approve ntc of court deeming case and complex and staying case until August cmc; emails re filing tomorrow	0.4

DATE	MATTER	USER	DESCRIPTION	HOURS
05/04/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email [REDACTED] re ntc [REDACTED] [REDACTED]	0.1
05/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	order filed	0.1
05/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw email from staff re conf of filing cmc statement	0.1
05/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw conformed ntc of cmc	0.1
05/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	DP	Phone call with client regarding [REDACTED] [REDACTED]	1.0
05/12/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw OL invoice	0.1
05/12/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw green card signed by def	0.1
05/19/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw conformed POS	0.1
05/19/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	eservice of POS and S7C	0.1
06/01/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	servie email ntc of appearance for def	0.1
06/01/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw def's ntc of apperance	0.1
06/22/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw O/C invoice	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
06/22/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review invoice	0.1
06/23/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft FAC for filing 7/2	1.5
06/29/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw OL invoice	0.1
06/29/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review invoice from one legal for filing docs	0.1
07/02/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	eservice notification of FAC	0.1
07/02/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from [REDACTED] re service of fac on def	0.1
07/07/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw email serving conformed fac on de cnsl	0.1
07/07/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	follow up emails to/from mt re [REDACTED] [REDACTED]	0.2
07/30/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review joint status	0.1
08/02/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw CMO and draft JISC report; send to def cnsl for review	1.3
08/04/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form def re [REDACTED]	0.1
08/04/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def re [REDACTED]	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
08/05/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from [REDACTED]	0.1
08/05/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 emails to/from team re [REDACTED]	0.2
08/05/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form team re [REDACTED]	0.1
08/05/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def re call tomorrow afternoon	0.1
08/05/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def re call tomorrow in the afternoon	0.1
08/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	m&c call with def	0.1
08/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form def with changes to cmc statement; rvw same; email to def cnsl re accept changes and please send final and we will file	0.3
08/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel disc [REDACTED]	0.3
08/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def re addl changes; rvw same	0.2
08/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emai to def approving addl changes	0.1
08/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email for def with final joint report; sign; send to team to file today	0.3
08/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw confirmed joint report	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
08/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	eservice of joint report	0.1
08/06/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def re call today at 2pm	0.1
08/10/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw oc invoice	0.1
08/10/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl with proceeding with PAGA only	0.1
08/10/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw OL Invoice	0.1
08/11/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review invoice from one legal	0.1
08/20/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re arb agreement; send to EBK; [REDACTED] to/from ebk and kms re [REDACTED]	0.6
08/20/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl re please send plaintiff's signed copy	0.1
08/23/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review arb agreement	0.1
08/23/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def with plaintiff signed agreement	0.1
08/25/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	appearance reminder	0.1
08/25/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	prep for cmc	0.5

DATE	MATTER	USER	DESCRIPTION	HOURS
08/25/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	email to def atty	0.1
08/25/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	attend cmc via courtcall	0.3
08/25/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email dates to team for master calendar	0.1
08/25/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	DP	Review email from Kelsey. Review case file. Email Kelsey regarding phone call to client.	0.5
08/26/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	multiple emails with Penner and team re [REDACTED], [REDACTED].	0.5
08/26/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	DP	Emails with Kelsey regarding status of case and call to client	0.3
08/26/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	DP	Phone call to client regarding status of case	0.3
08/26/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	DP	Email Kelsey regarding question from client	0.2
08/27/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	DP	Email with Kelsey and phone call with client regarding status of case.	0.5
08/27/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	DP	Phone calls with client regarding [REDACTED]. Emails with Kelsey regarding [REDACTED]	0.5
08/30/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	service of court's notice of fcmc	0.1
09/01/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	case status meeting with ebk and kms	0.5

DATE	MATTER	USER	DESCRIPTION	HOURS
09/01/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	case status meeting with ebk and kms	0.5
09/07/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw OL invoice	0.1
09/08/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review invoice from on call legal	0.1
11/09/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review email re filing	0.1
11/16/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft FCMC statement; send to def cnsl	0.8
11/22/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review docs from def	0.1
11/22/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def with revisions on joint report; email approving same and please return signed version for filing; rvw email with def signature; sign and team to file today	0.6
11/22/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	eservice notification	0.1
11/23/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw conformed JSC	0.1
12/02/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email re appearance info confirmation for 12/8	0.1
12/02/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email re courtcall conf for 12/8	0.1
12/13/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review dec	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
12/13/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw ntc of cmc	0.1
12/13/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review notice	0.1
12/14/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	eservice email of order granting rfd of class claims	0.1
12/14/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw conformed order granting rfd of class claims	0.1
12/14/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw OL filing submission order re RFD	0.1
12/14/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft dismissal dec and order; coordinate with team re filing	0.9
12/14/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw OL filing submission dismissal dec	0.1
12/14/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw conformed dismissal dec	0.1
12/14/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw order dismissing class claims	0.1
12/21/21	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 emails to/from def cnsl re filing amended complaint	0.2
01/05/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review arb agreement [REDACTED]	0.3
01/06/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft SAC with PAGA only allegations	2.0

DATE	MATTER	USER	DESCRIPTION	HOURS
01/06/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def re will send stip and order to amend for their review tomorrow	0.1
01/06/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	5 emails to/from def cnsl re meet and confer on SAC [REDACTED]	0.5
01/07/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel with daniel re their [REDACTED]	0.2
01/07/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel re case strategy with ebk and kms re [REDACTED]	0.5
01/07/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	tel re case strategy with ebk and kms re [REDACTED]	0.5
01/07/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	3 emails to/from daniel and kms re moving call and my cell number	0.3
01/10/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	case status meeting with ebk and kms	0.4
01/10/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	case status meeting with ebk and kms	0.4
01/10/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from daniel re [REDACTED]	0.2
01/10/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft Plaintiff's Set One Discovery including Sprogs , RTP, RFAs and Frogs	4.2
01/10/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel with ebk re case [REDACTED]	0.4
01/11/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to client re call tomorrow	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
01/11/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel to client, left VM; email to staff to reach out to her and set follow-up call in my calendar	0.1
01/12/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel with client re arb agreement	0.3
01/13/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	disc with ebk and kms re dismissal options of ind claims	0.3
01/13/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl re will dismiss client's ind claims	0.1
01/13/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def re request for ext on answer	0.1
01/13/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	3 emails to and from def re request and agreement to ext on their answer	0.3
01/13/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft dismissal dec and order re COAs 1-3; send to team to file	0.8
01/14/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	eservice of dismissal dec re COAs 1-3	0.1
01/14/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 emails to/from Kyle and KMS re [REDACTED] [REDACTED]	0.2
01/14/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw conformed KMS dec re COAs 1-3	0.1
01/14/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw email serving Set One Disc on Def	0.1
01/14/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	discovery to def	0.2

DATE	MATTER	USER	DESCRIPTION	HOURS
01/18/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	eservice and rvw signed order granting dismissal of causes of action 1-3	0.2
01/19/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl re agree to stay	0.1
01/19/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re will draft stip to stay case and circulate next week	0.1
01/25/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl with draft stip to stay action pending Viking; rvw and sign; email back to def cnsl	0.5
01/27/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	7 emails serving stip; rvw rec'd stamped stip; serviceand rvw signed order granting stip; service and rvw order cont cmc to June 28	0.9
04/01/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	case status meeting with ebk and kms	0.3
04/01/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	case status meeting with ebk and kms	0.3
06/21/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	review [REDACTED]; send comments to def cnsl re meet and confer to lift stay	2.5
06/21/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review email re arb	0.1
06/22/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails re calendaring and covering 6/28 cmc; for 2023 not 2022	0.3
06/23/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def they will file MTCA	0.1
06/23/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def re we will draft stip to lift stay	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
06/27/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft stip and order to lift stay and send to def cnsl for review	0.4
06/27/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review order lifting stay	0.2
07/01/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	case status meeting with ebk and kms	0.3
07/01/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	case status meeting with ebk and kms	0.3
07/12/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl re follow-up on stip to lift stay	0.1
07/12/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	stip to lift stay	0.1
07/13/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def with edits to stip to lift stay; pull stay order to confirm 2023 date; send comments to def cnsl re stip	0.4
07/13/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def with signed stip & order	0.1
07/13/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	sign stip and order; send to team to file	0.1
07/13/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	OL filing submission conf	0.1
07/13/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	eService stip and order	0.1
07/14/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review order	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
07/14/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	eService order to lift stay	0.1
08/15/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form team and rvw attached def's answer from mail	0.4
08/15/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review answer ot complaint	0.1
10/03/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	case strategy meeting with ebk and kms	0.5
10/03/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	case strategy meeting with ebk and kms	0.1
10/19/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl re getting disc back on track	0.1
10/27/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re proposed stay of discovery pending def's MTCA	0.1
10/27/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl re proposing the partis stip to stay PAGA claim and ind claim to arb	0.1
10/27/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	disc with ebk and kms re agreeing to stip to send ind claim to arb	0.3
10/27/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review email from def	0.1
10/28/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	randstad - email from def re will get back to us on stip to stay	0.1
11/07/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	email re agreement on arb	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
11/08/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	3 emails tofrom def cnsl and KMS re whether def will stip to arb ind PAGA and stay rep PAGA in state court	0.3
11/15/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft sitp and order to stay non-individual PAGA claim; send to def cnsl	0.8
11/30/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails to/from EBK, KMS [REDACTED] re status of [REDACTED]	0.4
11/30/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails tofrom client re case update on initiating arb	0.2
11/30/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails to/from team re setting client call	0.2
12/01/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def re status of his review of stip	0.1
12/01/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form def approving stip and returning with signature	0.2
12/01/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	sign stip and send to team to file	0.1
12/01/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	eservice of stip and order to stay case	0.1
12/01/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rve e'recd stamped stip and order	0.1
12/01/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review stip and order	0.1
12/02/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	email re stip	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
12/20/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	email re arb	0.2
12/22/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	pull and rvw signed order staying case and setting june cmc	0.3
12/22/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft complaint in arb with ind claims back in; PAGA claim; [REDACTED] send to team to package for AAA: rvw final and approve to serve	2.5
12/22/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 emails form ebk [REDACTED] re got out of message or bounce back for def; email re need to call and ask assistant or service email	0.3
12/23/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email [REDACTED] to def cnsl with courtesy copy of arb demand	0.1
12/29/22	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw green card signed by def for arb	0.1
01/09/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	case strategy meeting with ebk and kms	0.3
01/09/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	case strategy meeting with ebk and kms	0.3
01/17/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from AAA re updated servicelist	0.1
01/27/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emia from AAA re reminder strike list due 1/30	0.1
01/27/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	pull and send strike list to EBK	0.1
01/27/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel from ebk re strike list	0.2

DATE	MATTER	USER	DESCRIPTION	HOURS
01/27/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 emails [REDACTED] KMS re we never returned and eric is working on it	0.2
01/27/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	service of strike list on AAA and email from AAA re conf of receipt of same	0.2
02/01/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review strike list	0.5
02/02/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw strike list; [REDACTED]; discuss with Eric and KMS [REDACTED]	0.6
02/02/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw service of strike list on provider	0.6
02/03/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from arb provider re receipt of strike list	0.1
02/24/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from provider with Arb appointment; dates; conflict check etc; rvw all attachments and send to team for file	0.4
02/27/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	appotiment of arbitrator	0.2
02/28/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl re open to potential resolution of ind claims pending in arb	0.1
03/17/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	3 emails to/from team re setting up client call re case update [REDACTED]	0.3
03/17/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	review email and correspondence with date for prelim hearing; cmc template; rvw same and send to team for case file and calendaring	0.4
03/30/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from team re dial in added to ebk calendar	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
04/03/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	case strategy meeting with ebk and kms	0.4
04/03/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	case strategy meeting with ebk and kms	0.4
04/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email and rvw letter and invoice to def for \$750 case mgmt fee	0.1
04/11/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 further emails to/rom kms and def cnsl re call tomorrow to meet and confer re kms to cover friday call	0.2
04/11/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	begin to fill in case mgmt conference guide; send to def cnsl and try to set meet and confer call for tomorrow	0.3
04/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def re call this afternoon	0.1
04/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel with def cnsl re AAA mgmt statement	0.2
04/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	send edit to joint statement to team to make; email and rvw final' approve to send to AAA admin jointly and send new defense attorney to team for POS	0.4
04/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel to def cnsl	0.1
04/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl with my number for arb mgmt call today	0.1
04/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw email serving joint case mgmt. doc on AAA	0.1
04/13/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw email from AAA re call reminder	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
04/13/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to AAA re whether we can push call to 1pm	0.1
04/13/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email [REDACTED] re looping in arbitrator on proposed time change	0.1
04/14/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from arbitrator re 1pm conference time is okay and to use the same Zoom link	0.1
04/14/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from respondent re 1pm okay for him	0.1
04/14/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form ADR confirming time moved from 12pm to 1pm today	0.1
04/17/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from arbitrator with hearing dates and parties will meet and confer on his employment order	0.1
04/17/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to daniel to meet and confer on employment scheduling order this week	0.1
04/19/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	put together draft Employment Scheduling Order and send to Daniel	0.3
04/19/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel with def cnsl re employment order	0.2
04/24/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails to/from David re case status	0.2
04/24/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel with client	0.4
05/01/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def with proposed arb scheduling order	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
05/02/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw def's draft of proposed arb scheduling order; send feedback re proceeding under the CCP	0.3
05/02/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	3 emails to/from def cnsl and kms re removing frcp references; review revised draft; approve to serve on AAA	0.5
05/02/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw email serving cmp on arbitrator from def cnsl	0.1
05/02/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from AAA confirming receipt of scheduling order	0.1
05/03/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from arbitrator requesting selection on fee/costs issue	0.1
05/03/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from arbitrator re order is not complete bc we need to agree on fee award issue	0.1
05/04/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re prefer to bifurcate fee award	0.1
05/04/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re want to bifurcate	0.1
05/09/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	follow up email from def cnsl re bifurcating fees in arb	0.1
05/09/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl re agree to bifurcating fees in arb	0.1
05/09/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw def cnsl email to arbitrator re his question on fee bifurcation	0.1
05/09/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw email from arbitrator with attached CMO number 1	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
05/09/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw arbitrator's CMO number 1	0.1
05/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw email from AAA Daphne re formal CMO will be served	0.1
05/20/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	review email from arbitrator re potential conflict [REDACTED]	0.1
05/25/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def with draft PO	0.1
05/25/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from AAA re payment due for \$7,800	0.1
05/26/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from Def following up on draft PO	0.1
05/30/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def re submitting draft PO today	0.1
05/30/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	brief review PO and email to def cnsl re whether based on LASC model PO	0.3
05/30/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 follow up emails to/from def cnsl and KMS re need for PO	0.2
06/05/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email and rvw def's initial disclosures; rvw same; send to team for case file	0.3
06/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft initial disclosures; send to team to team serve	0.4
06/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	review file and pull client docs in file for initial disclosures	0.6

DATE	MATTER	USER	DESCRIPTION	HOURS
06/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw eservice of ID	0.1
06/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw letter from AAA re new case manager	0.1
06/13/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from AAA re payment received from respondent	0.1
06/13/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	email to AAA admin	0.1
06/13/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from ebk to AAA re whether \$7,800 was rec'd from Def	0.1
06/26/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl with discovery requests; brief review of same and send to Jessi for assignment	0.4
06/26/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft Claimant's discovery requests RTP and SProgs, Set One	1.5
06/27/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email confirming response deadlines in CMO for discovery	0.1
06/27/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email team and KMS re disc deadline	0.1
07/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	ntc of fcmc	0.1
07/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	rvw disc requests, email client	0.3
07/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	rvw disc requests, email client	0.3

DATE	MATTER	USER	DESCRIPTION	HOURS
07/20/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email team to follow up with client re discovery	0.1
07/25/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email [REDACTED] re client call for disc	0.1
07/26/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	call with client [REDACTED] re [REDACTED] [REDACTED] email KMS re phone call	2.2
07/26/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	3 emails to/from Jessi and KMS re client info from call for responses	0.3
07/28/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email fwd to KMS re [REDACTED]	0.1
08/01/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	case strategy meeting with ebk and kms	0.5
08/01/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	case strategy meeting with ebk and kms	0.5
08/03/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email [REDACTED] re client docs	0.1
08/04/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email with staff re disc responses	0.1
08/08/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Emails with staff re pl's disc resp; rvw client docs and info rec'd	0.2
08/09/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	draft disc resp	3.3
08/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	finalize discovery responses; [REDACTED] [REDACTED]	1.1

DATE	MATTER	USER	DESCRIPTION	HOURS
08/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	seyfarth docs service email	0.1
08/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails re final responses from Jessi and client verifications	0.2
08/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails re service of claimant's responses	0.3
08/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 emails to/from Jessi and KMS re client ind claims	0.2
08/11/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email with def's responses; forward to team	0.1
08/18/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re discussing deposition dates	0.1
08/22/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Emails re def's disc	0.1
08/22/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft proposed schedule of depos	0.3
08/22/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to jessi to review and meet and confer	0.1
08/22/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	3 emails to/from def cnsl and kms re call today at 1pm to discuss depos	0.3
08/22/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	Tel with def cnsl re depositions scheduling	0.1
08/29/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails from Yarko re moving weds call to next week	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
08/29/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to Yarko re moving weds call to next week	0.1
08/29/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	3 further emails with def cnsl re setting call today to discuss depo issue	0.3
08/29/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel with def cnsl re mckelvey Jan 2024 and revising disc order	0.1
08/29/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails to/from kms and ebk re kms to cover arb call tomorrow	0.2
08/29/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to McKelvey re Jan 2024 dates	0.1
08/29/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	email from arbitrator	0.1
08/30/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def csnl sending revised proposed schedule	0.1
08/30/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form Yarko proposing moving call to 9/7 call to next week	0.1
08/30/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from KMS re okay for call to move to 9/7 call to next week	0.1
08/30/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re approve call to move to 9/7 call to next week	0.1
08/30/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	4 emails form Yarko and AAA re conf of call changed and new zoom invite	0.4
09/04/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from Jessi re her review of their disc responses and M&C needed	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
09/04/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Receipt/review defs disc responses; email KMS	0.8
09/05/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re follow up on scheduling order	0.1
09/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw revised arb scheduling order	0.1
09/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	send approval to submit scheduling order to def cnsl in advance of hearing on thursday	0.1
09/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to Jessi re client depo prep and her review of their disc responses and M&C needed	0.1
09/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def re will submit to arbitrator	0.1
09/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw service of depo schedule on AAA	0.1
09/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	8 emails to/from arbitrator, def cnsl and KS re tomorrow hearing off and reset for 1/15 but holiday so 1/16	0.8
09/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from McKelvey with Jan dates	0.1
09/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	check Jan 2024 dates that work for us and send to def cnsl	0.2
09/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review email re mediation	0.1
09/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email with staff re client call	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
09/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email staff to prep ROGG	0.1
09/07/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Phone call with client	1.0
09/07/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form JB re client depo dates for Oct	0.1
09/07/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form Jessi re [REDACTED]	0.1
09/11/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	review email re case issues and depositions	0.2
09/11/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re med date	0.1
09/11/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	select date and send to McKelvey to book	0.1
09/11/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re dates for P depo oct	0.1
09/11/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl re will review dates	0.1
09/11/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from Jessi re need ext on MTC deadline	0.1
09/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	emails with KMS re depo, email co counsel	0.3
09/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	disc and email from Jessi re ext on mtc deadline	0.2

DATE	MATTER	USER	DESCRIPTION	HOURS
09/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email re client can do depo 924 or 9/25	0.1
09/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	disc with Jessi and KMS re she needs ext on MTC deadline and to contact def cnsl when setting P depo dates	0.2
09/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 emails from team re client availability for depo	0.2
09/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	Jessi email to def cnsl re available 10/24 for depo and ext	0.1
09/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl confirming 10/24 for depo and ext to 10/6 on mtc deadline	0.1
09/13/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email and rvw defs ntc of depo of P	0.2
09/14/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	review def doc production, email KMS and EBK, draft M&C letter and send to KMS for review	1.5
09/19/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Review/revise M&C letter re PMK designations	0.5
09/19/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	3 emails tofrom def cnsl and kms re whether mediation confirmed for Jan 9	0.3
09/19/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	3 emails with JB and review and revise M&C letter to def on Claimant's docs	0.4
09/22/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	final review of Jessi's M&C email and approval to get out	0.1
09/22/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	bounce back from Wahlander and look into POS service issues; he left from; email to def cnsl re POS update	0.2

DATE	MATTER	USER	DESCRIPTION	HOURS
09/22/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw email serving M&C letter on def cnsl	0.1
09/25/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Emails re depo	0.1
09/25/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re updated service list	0.1
09/27/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Emails re depo to KMS and staff	0.7
09/27/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re want to take depo in person	0.1
09/27/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails to/from Jessi and KMS re in person depo; [REDACTED] [REDACTED]	0.4
09/28/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re proposed ext on MTC from 10/6 to 10/27	0.1
09/28/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email re depo to KMS	0.1
10/02/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def re client [REDACTED] [REDACTED]	0.1
10/02/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def re depo in person follow-up	0.1
10/03/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	discussion with JB and KMS re agreeing to def's proposed ext on MTC from 10/6 to 10/27	0.1
10/03/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw JB email to def cnsl agreeing to their proposed ext on MTC from 10/6 to 10/27	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
10/09/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw McKelvey confirmation packet and invoice	0.1
10/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails to/from team and client re 10/24 remote depo	0.2
10/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def re agree to take 10/24 remote depo	0.1
10/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def re agree to pay for in person as needed if doesn't settle	0.1
10/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from client re [REDACTED]	0.1
10/11/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	depo prep with Jessi and KMS	0.8
10/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def with amended depo notice	0.1
10/12/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def re calendaring of depo and objection deadlines	0.1
10/18/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	doc review	0.3
10/18/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	depo prep, doc review	2.5
10/18/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	6 emails to/from KMS, Jessi, EBK [REDACTED] re [REDACTED]	0.6
10/23/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def requesting extension	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
10/23/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	depo prep	0.5
10/23/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	tel with Jessi re I will defend depo tomorrow	0.3
10/24/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Phone call with client re depo	0.4
10/24/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	defend client depo	6.0
10/25/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from Jessi agreeing to extension a	0.1
10/25/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 emails t/from Jessi and KMS re whether we should approve ext and whether it came up at depo	0.2
11/01/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email re disc and PMK depo from def counsel, email to KMS rw M&C letter	0.4
11/01/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def re request on ext	0.1
11/01/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from Jessi re agreeing to extension and whether we want to set PMK	0.1
11/03/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Draft/revise email re discovery	0.3
11/03/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 emails to/from Jessi and KMS re whether we should set PMK before mediation and approve addtl ext request	0.2
11/03/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from Jessi approving ext to def cnsl	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
11/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email to def counsel re disc	0.1
11/06/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw JB email to def cnsl re mtc deadline to 12/1	0.1
11/09/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	emails re MTC deadline, pending discovery	0.3
11/09/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form def re will get back to us time records and stay disc until after mediation	0.1
11/10/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from Veritext with invoice	0.1
11/13/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	send invoice to [REDACTED] for payment and cost posting to case	0.1
11/13/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw payment conf for client depo trascript	0.1
11/28/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails re KMS to cover 12/6 cmc	0.2
11/28/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft joint cmc statement and send to def cnsl for review	0.3
11/30/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def with changes to report	0.1
11/30/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def re changes are okay and we will file	0.1
12/01/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw conformed joint report	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
12/04/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	service and rvw Judge Zaynor order moving 12/6 cmc to 1/31	0.1
12/19/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Phone call with [REDACTED]; [REDACTED] email KMS and EBK	1.0
12/20/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	revise mediation brief, review notes, email KMS	0.5
12/21/23	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Draft/revise mediation brief, review client's time and pay records, email KMS re [REDACTED]	4.5
01/03/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	mediation prep; damage model; review brief; talk with expert	3.5
01/03/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	revise mediation brief, sent to staff for finalizing	0.6
01/08/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	case status meeting with ebk and kms	0.4
01/08/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	case meeting with ebk and kms	0.4
01/09/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	attend mediation	5.3
01/09/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	Zoom mediation	5.0
01/09/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from admin with bid; rvw and send to service for file	0.1
01/09/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	attend mediation	6.0

DATE	MATTER	USER	DESCRIPTION	HOURS
01/10/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	AAA ntc of status conf	0.1
01/10/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email with mediator's proposal	0.1
01/10/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	jams service of revised ntc of hearing	0.1
01/11/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form arb cont status conf to 1/22	0.1
01/12/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	for notice from AAA moving stsatus conf to 1/22	0.1
01/12/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails to from KMS and Veritext re never got a copy of transcript and will resend	0.2
01/18/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	discussion with mediator re proposal; email to mediator accepting proposal	0.2
01/18/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email team re mediation ntoes, proposal, and admin bid	0.3
01/19/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	AAA reminder	0.1
01/19/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Emails with KMS re settlement calculations, review notes	0.5
01/22/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Phone call with client re settlement	0.4
01/22/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails from KMS, def cnsl, AAA and arbitrator confirming call taken off today due to proposal acceptance	0.3

DATE	MATTER	USER	DESCRIPTION	HOURS
01/22/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	emails to/from kms and def cnsl re K&K to draft SA	0.2
01/22/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft joint report and send to def cnsl to review	0.2
01/24/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw def's email and edits to joint report	0.1
01/24/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def approving report edits and we will file	0.1
01/29/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Draft/revise settlement agreements	0.8
01/30/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	review and revise draft PAGA agreement; send feedback to Jessi	0.8
01/30/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Review/revise PAGA settlement agreement; send to def	0.6
02/06/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw JB email to def cnsl re follow up on whether they rec'd draft SA last week	0.1
02/06/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email to def counsel following up on drafted agreements	0.1
02/26/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	3 emails to/from AAA and def cnsl re status of arb	0.3
03/12/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 emails to/from def cnsl re status of their review of SA	0.2
03/19/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	review settlemenet agreements, review mediation notes, email with KMS re the same	0.2

DATE	MATTER	USER	DESCRIPTION	HOURS
03/20/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	review defs redlines to the agreements, emails with KMS re the same	0.7
03/21/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	email to KMS re settlement agreement edits	0.1
04/01/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Eric Kingsley	case status meeting with ebk and kms	0.2
04/01/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	case strategy meeting with ebk and kms	0.2
04/09/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl re follow up on status of their review of our further edits to PAGA SA	0.1
04/15/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	receive SA from def counsel, send to staff to get signatures	0.2
04/15/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl approving our changes to SA and returning final versions	0.1
04/18/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw service of notice of name change	0.1
04/18/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw client signed SA	0.1
04/24/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def cnsl re sig on SA	0.1
04/24/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	2 emails from team re status with client [REDACTED]	0.1
04/24/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email re client's tax forms	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
04/24/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email re settlement agreement	0.1
04/25/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to clerk requesting hearing date	0.1
04/25/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw client signed SA	0.1
04/25/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw email to def cnsl with client signed SA	0.1
04/25/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from clerk re 9/18	0.1
04/25/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def cnsl re SA coming and proposed 9/18 hearing	0.1
04/25/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to clerk re 9/18 date	0.1
04/25/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	confirmation from clerk re 9/18 date	0.1
04/25/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def re 9/10 works	0.1
04/29/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw email to def csnl with plaintiff tax docs and SA forms	0.1
05/07/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from AAA re case status	0.1
05/08/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to AAA re they can close file	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
05/10/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from AAA re case formally closed and order will issue	0.1
05/15/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	revise approval motion and fee motion	2.4
05/15/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to admin re dec ISO motion	0.1
05/15/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw admin dec iso motion	0.1
05/15/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form admin re need caption page for dec	0.1
05/17/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	review and revise PAGA approval motion; [REDACTED] send feedback to Jessi and have her send to def cnsl for review	1.2
05/20/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form def cnsl re will review draft motion	0.1
06/05/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw email form def with edits to motion;	0.3
06/05/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	rvw der edits to motion	0.2
06/05/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email to def re approving edits to motion and will finalize and file promptly	0.1
06/05/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	draft dec ISO motion	0.5
06/05/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email form JB re [REDACTED]	0.1

DATE	MATTER	USER	DESCRIPTION	HOURS
06/06/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	review client dec, approve for sig	0.3
06/06/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Receipt/review question from client re [REDACTED] [REDACTED]	0.1
06/07/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email re fee motion	0.1
06/12/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	fee motion	1.0
06/12/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	finalize approval motion and dec	0.5
06/12/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Receipt/review fee motion	0.2
06/13/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from def with signed agreements	0.1
06/13/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Kelsey Szamet	email from JB re [REDACTED] [REDACTED]	0.1
06/13/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email def counsel re sig on agreement	0.1
06/14/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Email to KMS and team re orders for motions	0.1
06/18/24	40.95- Randstad US, LLC and Advoque adv. Guzman, Cristina	Jessi Bulaon	Review/revise fee motion and supporting docs, etc	0.3
Total				157.9

(Proof of Submission to Labor &
Workforce Development Agency)

EXHIBIT "2"

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On October 8, 2024, I served all interested parties in this action the following documents described as: **SUPPLEMENTAL DECLARATION OF KELSEY M. SZAMET IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT AND MOTION FOR APPROVAL OF ATTORNEYS' FEES** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Elizabeth J. MacGregor
emacgregor@seyfarth.com
SEYFARTH SHAW LLP
560 Mission Street, 31st Floor
San Francisco, California 94105

Daniel C. Whang
dwhang@seyfarth.com
SEYFARTH SHAW LLP
2029 Century Park East, Suite 3500
Los Angeles, California 90067

SEYFARTH SHAW LLP
Jeffrey A. Nordlander
jnordlander@seyfarth.com
400 Capitol Mall, Ste 2350
Sacramento, CA 95814-4428

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL TRANSMISSION: I caused the document to be sent to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 8, 2024, at Encino, California.


Michelle Tanzer