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ELECTRONICALLY FILED
Superior Court of California,
County of Alameda
11/18/2025 at 03:16:34 PM
By: Tomacita Matuz,
Deputy Clerk

Attorney for Plaintiff MARTA AGUILAR, as representative of the State of California and the Labor and Workforce Development Agency, and on behalf of herself and other current and former employees.

[Additional Attorneys Listed on Following Pages]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

**ELDER CARE ALLIANCE AND
ALMAVIA WAGE AND HOUR CASES**

MARTA AGUILAR, on behalf of herself and
all other aggrieved employees,

Plaintiff,

v.

ELDER CARE ALLIANCE OF SAN
RAFAEL, a California Corporation; and
DOES 1-50, Inclusive,

Defendants.

Case No.: RG21090600 (Lead Case)
CGC-21-588913 (San Francisco);
RG21090600;
RG21102829;
RG21107053;
22CV022908;
23CV046186

**DECLARATION OF JUSTIN LO IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND
APPLICATION FOR ATTORNEY'S FEES
AND COSTS**

Date: December 9, 2025
Time: 2:30 p.m.
Dept.: 21
Judge: Hon. Somnath Raj Chatterjee

Complaint Filed: July 29, 2021
Arias Class Action filed: March 3, 2021
Arias PAGA Action filed: June 24, 2021
Tabuyo Action filed: November 30, 2021
Ballesteros Action filed: January 13, 2021(SF)
October 2, 2023 (AL)

1 YESENIA ARIAS, individually, and on behalf of
2 other aggrieved employees pursuant to the
California Private Attorneys General Act;

3 Plaintiff,

4 vs.

5 ELDER CARE ALLIANCE, an unknown
business entity; and DOES 1 through 10,
6 inclusive,

7 Defendants.

8 YESENIA ARIAS, individually, and on behalf
of other members of the general public
9 similarly situated;

10 Plaintiffs,

11 vs.

12 ELDER CARE ALLIANCE, an unknown
business entity; and DOES 1 through 10,
inclusive,

13 Defendants.

14 MARIA TABUYO, individually, and on behalf of
15 other members of the general public similarly
situated;

16 Plaintiff,

17 vs.

18 MERCY RETIREMENT AND CARE CENTER
AND ELDER CARE ALLIANCE INC., an
19 unknown business entity; and DOES through 100,
20 inclusive,

21 Defendants.

1 MARITES BALLESTEROS, individually, and on
2 behalf of other members of the general public
similarly situated;

3 Plaintiff,

4 vs.

5 ELDER CARE ALLIANCE OF SAN
6 FRANCISCO INC. D/B/A ALMAVIA OF SAN
FRANCISCO, an unknown business entity; and
DOES through 100, inclusive,

7 Defendants.
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21 *Attorneys for Plaintiff, Yesenia Arias in the Arias Actions*
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DECLARATION OF JUSTIN LO

I, JUSTIN LO, Declare:

1. I am an attorney at law licensed to practice before all the courts of the State of California and before this Court. I am a founder of the law firm Work Lawyers P.C., and the attorney of record for the Plaintiff.
2. I have personal knowledge of the facts stated herein and if called as a witness, I could and would competently testify to the following under oath.
3. This declaration is submitted in support of Plaintiff's Motion for Final Approval of Class Action Settlement and Application for Attorney's Fees and Costs.
4. Work Lawyers P.C. is representing Plaintiff Marta Aguilar in the above-entitled action.
5. I am unaware of any conflict of interest between myself or my law firm and any member of the proposed Class which should or would preclude me from representing the Class. I also am unaware of any other cases raising any issues that overlap with the proposed class or issues raised in this matter.
6. In the course of informal discovery prior to mediation my office made a request for a statistically significant sampling of 1/3rd of Defendant's employee records comprising of the payroll summaries and daily time records. These records were then reviewed with the assistance of an expert to derive various damage models and possibilities of violation rates and damages.
7. This matter proceeded through two challenging mediations with Mark Rudy Esq. as various disputes over liability and class certification arose.

Qualifications of Class Counsel

8. I have 14 years of experience as a practicing attorney, I graduated from University of California Irvine in 2006 and graduated from the University of California Los Angeles School of Law in 2011. While in law school, I obtained a specialization in business law and policy.
9. I was selected as a 2019, 2020 and 2021 as a Rising Star in Employment Law by Super Lawyers.

10. I have successfully represented hundreds of employees in legal matters including PAGA lawsuits, complex litigation cases and individual wage and hour and employment related matters. Work Lawyers PC's practice is devoted entirely to the prosecution of employment-related violations of the California Labor Code on behalf of California employees.
11. Our firm focuses entirely on labor and employment matters on behalf of California employees and we have been exclusively practicing labor and employment, wage and hour class and PAGA actions since 2017. My firm is currently lead or co-lead counsel in over 50 wage and hour class actions and/or representative actions brought under the Private Attorneys' General Act of 2004 ("PAGA") in both federal and state court. Attached as Exhibit A is a list of my representative wage and hour cases where I am lead or co-counsel.

Settlement Agreement and Preliminary Approval

12. The Parties Preliminary approval of the settlement of this matter was granted on or about June 12, 2025, by Hon. Somnath Raj Chatterjee. This Court conditionally certified the proposed Class for Settlement purposes. For purposes of the Settlement, the Court preliminarily certified a Settlement Class consisting of all current and former hourly-paid or non-exempt employees of Defendants in California employed between January 13, 2017 through the date of preliminary approval, or 90 days after the signing of the MOU, whichever is sooner." (the "Class Period.") Other than those who opt out of the Settlement, the total number of Class Members consists of Plaintiff and 1,253 individuals.
13. This Settlement is fair and reasonable because it provides substantial and immediate benefits to the class members. The Settlement is jointly presented as the product of extensive arms' length negotiations by experienced counsel on both sides after thorough discovery, litigation, and reorganization of the strengths and weaknesses of each side's position. In calculating the appropriate settlement amount, the parties had sufficient information and had conducted an adequate investigation to allow them to make educated and informed analyses and conclusions. Accordingly, on behalf of Plaintiffs and on behalf of the Class, I submit that the calculated settlement for each participating class member is fair, reasonable, and adequate given the inherent risk and costs of litigation. The settlement was reached

after months of negotiations with the aid of an experienced mediator on two separate occasions.

14. To date, the response to the Settlement has been extremely favorable. To date, there are no objections to the proposed Settlement and Class Counsel is unaware of any Settlement Class Member who has filed an objection. (Singh Dec. ¶ 12). There are zero requests for exclusion and no outstanding disputes. (Singh Dec. ¶ 13).

15. In support of named Plaintiff Marta Aguilar request for an enhancement fee, Ms. Aguilar has concurrently filed her declaration regarding her efforts and personal risks undertaken to represent the class.

16. The entire net settlement amount shall be distributed to participating Settlement Class Members. The net settlement amount is estimated to be at least \$3,227,835.21. On average, each class member will receive \$2,576.09. (Singh Dec. ¶17). The highest individual settlement payment will be approximately \$8,988.15 . The average PAGA payment is \$49.88 while the highest is \$178.10 (Singh Dec. ¶18).

17. It should be noted the period for class members to exclude themselves from the settlement was October 27, 2025.

18. Therefore, the Settlement Class will receive payment that far exceeds the attorneys' fees paid out pursuant to the Settlement.

THE SETTLEMENT IS FAIR, JUST AND REASONABLE

19. There was a tremendous amount of work performed by Work Lawyers PC on behalf of Plaintiffs and the Plaintiff Class on a contingency basis. Not less than 111.10 hours have been expended by Work Lawyers PC on this matter.

20. The Court has the power to award attorney's fees and expenses to Plaintiff's counsel under the "common fund" theory as held by the California Supreme Court in *Laffitte v. Robert Half International, Inc.* (2016) 1 Cal.5th 480. The "common fund" theory permits attorneys' fees in a class action to be calculated as a percentage of the common fund created by a settlement or judgment and an award is not per se unreasonable merely because it is calculated as a percentage of the common fund. *Lafitte* at 486.

1 21. The applicable hourly billing rates for the attorneys who worked on this matter on behalf of
2 Plaintiff and the Plaintiff Class are as follows: \$750 per hour for Justin Lo. Using the
3 lodestar method, attorney time multiplied by counsel's billing rate yields a lodestar of
4 \$83,280.00 based upon 111.10 contingent hours of service performed.

5 22. In determining my hourly rate, I have taken into consideration the Laffey Matrix. The Laffey
6 Matrix is a "pay table for attorneys put out by the Department of Justice."(*Nemecek & Cole*
7 *v. Horn* (2012) 208 Ca.App.4th 641, 65-651 [approving attorney fees based on the Laffey
8 Matrix]; see also *Tukes v. Richard* (2022) 81 Cal.App.5th 1, 18 [approving attorney fees
9 based on the Laffey Matrix].) The Laffey Matrix represents "an official source of attorney
10 rates based in the District of Columbia area, which can be adjusted" to the California
11 community in question "by using Locality Pay Tables." (*Syers Properties III, Inc. v. Rankin*
12 (2014) 226 Cal.App.4th 691, 695 [quoting, with approval, *In*
13 *re HPL Technologies, Inc. Securities Litigation* (N.D. Cal. 2005) 366 F.Supp.2d 912, 922].)
14 Following the approach taken in *Syers* and *HPL Technologies*, I have located my hourly
15 rate on the Laffey Matrix, attached hereto as **Exhibit B**. Being an attorney for over 14 years,
16 my hourly rate on the Laffey Matrix is \$948 per hr.

17 23. Accordingly, my requested rate of \$750 per hour is conservative as compared to my rate
18 under the Laffey Matrix.

19 24. To date Work Lawyers PC, through the efforts of myself has spent at least a cumulative
20 111.10 contingent hours litigating this matter. See contemporaneously recorded time
21 attached as **Exhibit C**. Work Lawyers PC has also incurred reasonable and necessary costs
22 of \$9,779.69. These costs are detailed as **Exhibit D**.

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

25 Executed November 13, 2025, at Torrance, California.

26 
27 Justin Lo

EXHIBIT A

- *Sanae Matsuda v. Harry T. Nomura, D.D.S. Inc.*, San Francisco Case No. CGC-19-574949
- *Hector Montoya v Kings Oil Tools Inc.*, San Luis Obispo Superior Court, Case No. 19CVP-0413;
- *Stephen Bailey v. Kinder Morgan G.P.* United States District Court, Case No. 3:18-cv-03424-TSH
- *Genevieve Rangel v. Bassett Furniture NC LLC.* Orange County Superior Court Case No. 30-2018-01040101-CU-OE-CXC
- *Martin Rubio v. Altman Specialty Plants, Inc.* Los Angeles Superior Court Case No. 18STCV09215
- *Caroline Villata v. Stars Recreation Center, Solano County Superior Court Case No. FCS054507*
- *Jason Hogan v. Wolverine Distribution Inc.*, Riverside County Superior Court Case No. RIC1902891
- *Jose Rosales v. IDT America Corp. et al.*, Los Angeles Superior Court Case No. 19STCV01581
- *Eric Hardie v. Mattel Inc. et al.*, Los Angeles Superior Court Case No. 21STCV11096
- *Richard Ward v. Miller Jones Mortuary & Crematory, Inc.* Riverside Superior Court Case No. RIC2002589
- *Michael Franchini v. General Consolidated Constructors, Inc.* Riverside Superior Court Case No. RIC2001600
- *Christopher Marrone v. Caffeine Studios LLC.*, San Mateo Superior Court Case No. 20-CIV-04830
- *Annette Arredondo v. UFIT Physical Therapy Enterprise* Los Angeles Superior Court Case No. 21STCV07346
- *Chelsea Bedoni v. LPDB Joint Ventures*, Yuba Superior Court Case No. CVCV19-01058 21STCV25740
- *Allan Castaneto v. Calop Business Systems, Inc.*, Los Angeles Superior Court Case No. 20STCV03772

- *Joaquin Del Cid, Jr. v. Jonathan Club, Los Angeles Superior Court Case No. 20STCV12113*
- *John Coles v. Sally Beauty Holdings, Inc., Los Angeles Superior Court Case No. 21STCV01648*
- *Adam Davidson v. Los Angeles Truck Centers, LLC, Los Angeles Superior Court Case No. 20STCV41572*
- *Donald Dumas v. Allied Nationwide Security, Inc., Los Angeles Superior Court Case No. 21STCV26647*
- *Shawn Fitzpatrick v. Concord Foods, Inc. San Bernardino Superior Court Case No. CIVSB2116303*
- *Eduardo Galeana v. Master Property Management, Inc., Los Angeles Superior Court Case No. 21STCV16625*
- *Ronak Garg v. Providence Medical Associates, Inc. Los Angeles Superior Court Case No. 22STCV03368*
- *Maria Magdalena Gomez v. Bel Aire Bridal, Inc., Los Angeles Superior Court Case No. 21STCV27188*
- *Brenda Hayden vs. Aftermath Services, LLC, Sacramento Superior Court Case No. 34-2020-00287716-CU-OE-GDS*
- *Chad Hooper v. Vizio, Inc., Orange Superior Court Case No. 30-2020-01144007-CU-OE-CXC*
- *Ghufran Khan v. Atlas Air, Inc., Los Angeles Superior Court Case No. 20STCV40478*
- *James Legare v. Lebo Automotive, Inc. Los Angeles Superior Court Case No. 20STCV03227*
- *Cheyenne Mallas v. Alexander Rivkin, MD, Inc. Los Angeles Superior Court Case No. 21STCV21726*
- *Charlie Meas v. Excel Test Prep Alameda Superior Court Case No. HG19027287*
- *Ashli Morris v. Kids Overcoming, LLC Alameda Superior Court Case No. HG20064207*
- *Sharon Park v. American Contractors Indemnity Company Los Angeles Superior Court Case No. 22STCV03555*
- *Fernando Pereyra v. Maverick Aerospace, LLC Los Angeles Superior Court Case No.*

20STCV29642

- *Natalie Randazzo v. BCSF, Inc. San Francisco Superior Court Case No. CGC-20-585430*
- *Geovanni Romero v. The Nu Paradigm House, LLC Los Angeles Superior Court Case No. 21STCV35414*
- *Gabriela Ruiz v. Cotton Citizen, Inc. Los Angeles Superior Court Case No. 21STCV18414*
- *Issa Sakhel v. One World Beef LLC San Diego Superior Court Case No. 37-2021-00043571-CU-OE-NC*
- *Christina Zamora v. Fresno Community Hospital Medical Center Fresno Superior Court Case No. 20CECG01220*

EXHIBIT B

LAFFEY MATRIX

[History](#)
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[See the Matrix](#)
[Contact us](#)
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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389

6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $i_{\frac{1}{2}}$ Years Out of Law School $i_{\frac{1}{2}}$ is calculated from June 1 of each year, when most law students graduate. $i_{\frac{1}{2}}$ 1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $i_{\frac{1}{2}}$ 4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $i_{\frac{1}{2}}$ 1-3" from June 1, 1996 until May 31, 1999, would move into tier $i_{\frac{1}{2}}$ 4-7" on June 1, 1999, and tier $i_{\frac{1}{2}}$ 8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT C

ITEM	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (with client) Discussion with client regarding facts of her case, potential legal outcomes, terms of representation , review of documents	4/14/2021	4.5	\$750.00	\$3,375.00	Justin Lo
Communicate (with client) Review of defendants wage and hour filings, other PAGA notices	4/16/2021	2.4	\$750.00	\$1,800.00	Justin Lo
Communicate (with client) explaining to client the violations to be pursued	4/19/2021	1.1	\$750.00	\$825.00	Justin Lo
Draft/revise Drafting of PAGA notice after review of intake and documents	5/13/2021	1.8	\$750.00	\$1,350.00	Justin Lo
Draft/revise Drafting of PAGA complaint after review of clients intake and 226 response documents	7/27/2021	2.7	\$750.00	\$2,025.00	Justin Lo
Draft/revise Draft and propound discovery after review of file	10/8/2021	3.8	\$750.00	\$2,850.00	Justin Lo

ITEM	DATE	HRS.	RATE	TOTAL	BILLED BY
Draft/revise Review OPC comments regarding Belaire West notice	1/31/2022	0.8	\$750.00	\$600.00	Justin Lo
Analyze Review Defendants Form Rogs Response General, Employment, RPD and SROG	3/8/2022	4.8	\$750.00	\$3,600.00	Justin Lo
Communicate with OPC Discuss with OPC regarding stip of discovery and reviewing proposed stip	4/8/2022	0.8	\$750.00	\$600.00	Justin Lo
Time review of defendants doc production	4/8/2022	6.3	\$750.00	\$4,725.00	Justin Lo
Draft/revise Draft meet and confer letter for form rog, RPD	4/13/2022	2.8	\$750.00	\$2,100.00	Justin Lo
Draft/revise Amend and file amended PAGA notice based upon new theories and updated employer information	4/22/2022	1.6	\$750.00	\$1,200.00	Justin Lo

ITEM	DATE	HRS.	RATE	TOTAL	BILLED BY
Draft/revise Draft email to Berger with my review of the case, complaint, wage statements and time cards on areas to identify and likely violations and defenses	7/8/2022	4.5	\$750.00	\$3,375.00	Justin Lo
Communicate with OPC Email to OPC regarding amending PAGA notice and PAGA ccomplaint	7/22/2022	0.4	\$750.00	\$300.00	Justin Lo
Analyze Analyze first draft of Berger Report and make comments for changes	7/22/2022	2.1	\$750.00	\$1,575.00	Justin Lo
Analyze Analyze second draft of Berger analysis report	8/1/2022	0.8	\$750.00	\$600.00	Justin Lo
Communicate (with client) Spoke with client about mediation and clarifying facts and practices	8/3/2022	0.8	\$750.00	\$600.00	Justin Lo
Draft/revise Draft mediation brief and mark wage statements, time cards and employer policies	8/9/2022	11.5	\$750.00	\$8,625.00	Justin Lo
Appear for/attend review brief and review exhibits and attend mediation with Mark Rudy	8/11/2022	8.5	\$750.00	\$6,375.00	Justin Lo

ITEM	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate with OPC Email with Hightower regarding deposition	10/5/2022	0.7	\$750.00	\$525.00	Justin Lo
Communicate (other outside counsel) Preparation and call with other counsel regarding potential petition for coordination and joint discovery	10/6/2022	1.3	\$750.00	\$975.00	Justin Lo
Communicate (with client) call with client to discuss deposition preparation	10/7/2022	0.9	\$750.00	\$675.00	Justin Lo
Communicate (with client) Discussion with client regarding discovery responses and review of responses and documents	11/14/2022	9.5	\$750.00	\$7,125.00	Justin Lo
Draft/revise Finalizing Plaintiffs Response to Defendants RPD, FORM ROGS Employment and Form Rogs General	11/22/2022	2.8	\$750.00	\$2,100.00	Justin Lo
Communicate (other outside counsel) Email with other counsel to coordinate mediation, expenses and fees	2/24/2023	0.4	\$750.00	\$300.00	Justin Lo

ITEM	DATE	HRS.	RATE	TOTAL	BILLED BY
Draft/revise Draft email to OPC regarding certain missing documents regarding their time keeping policy. Identify areas of concern for mediation	3/17/2023	0.5	\$750.00	\$375.00	Justin Lo
Appear for/attend Appear for additional mediation with Mark Rudy	3/21/2023	8.5	\$750.00	\$6,375.00	Justin Lo
Communicate (with client) Discussion with client regarding settlement, risks and benefits of settlement, explaining remaining process	3/27/2023	0.7	\$750.00	\$525.00	Justin Lo
Analyze Review MOU	4/28/2023	0.7	\$750.00	\$525.00	Justin Lo
Analyze Review of Judge Desautels general order and inputting instructions and notes	7/17/2023	0.7	\$750.00	\$525.00	Justin Lo
Analyze Review of long form settlement agreement draft from Eva	9/25/2023	0.9	\$750.00	\$675.00	Justin Lo

ITEM	DATE	HRS.	RATE	TOTAL	BILLED BY
Analyze Review of motion to consolidate and FAC	10/20/2023	0.7	\$750.00	\$525.00	Justin Lo
Analyze Review of Long Form	11/1/2023	0.6	\$750.00	\$450.00	Justin Lo
Communicate (with client) Answer client question about settlement	11/1/2023	0.4	\$750.00	\$300.00	Justin Lo
Analyze Review of tentative ruling and settlement agreement and PAGA release	11/9/2023	0.9	\$750.00	\$675.00	Justin Lo
Analyze Review of bids from class administrators	12/22/2023	0.3	\$750.00	\$225.00	Justin Lo
Analyze Review of long form and proposed stipulation	12/26/2023	0.7	\$750.00	\$525.00	Justin Lo
Communicate (with client) Call with other counsel and summary of notes	1/16/2024	0.5	\$750.00	\$375.00	Justin Lo

ITEM	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate with OPC Review of tentative in Aguilar matter and email communication with Andrew on further steps	1/29/2024	1.1	\$750.00	\$825.00	Justin Lo
Communicate (other external) preparation and discussion of long form settlement with other plaintiffs counsel	3/25/2024	0.6	\$750.00	\$450.00	Justin Lo
Analyze review proposal of responsibilities between counsel	3/25/2024	0.6	\$750.00	\$450.00	Justin Lo
Draft/revise Review motion for P&A and declarations for preliminary approval	7/2/2024	3.2	\$750.00	\$2,400.00	Justin Lo
Draft/revise Drafting declaration for preliminary approval	7/3/2024	2.8	\$750.00	\$2,100.00	Justin Lo
Review and Revise Draft dec for motion for preliminary approval and provide review of motion for preliminary approval	9/18/2024	2.4	\$750.00	\$1,800.00	Justin Lo
Draft/revise Review of motion for preliminary approval and associated decs	9/24/2024	0.8	\$750.00	\$600.00	Justin Lo

ITEM	DATE	HRS.	RATE	TOTAL	BILLED BY
Other Finalize motion and declarations for preliminary approval with exhibits	9/24/2024	0.3	\$750.00	\$225.00	Justin Lo
Analyze Review of class notice and settlement agreement	1/3/2025	0.6	\$750.00	\$450.00	Justin Lo
Communicate (with client) Explaining to client the revised settlement agreement	1/3/2025	0.4	\$750.00	\$300.00	Justin Lo
Communicate (with client) texted client regarding case update	8/20/2025	0.3	\$750.00	\$225.00	Justin Lo
Manage data/files Verified the court docket to determine if a tentative ruling had been issued	9/9/2025	0.1	\$750.00	\$75.00	Justin Lo
Manage data/files save tentative ruling	9/9/2025	0.1	\$150.00	\$15.00	Kimberly Rodriguez
Analyze Analyze and add comments regarding administrator email	11/7/2025	0.4	\$750.00	\$300.00	Justin Lo

ITEM	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (with client) Texted client regarding declaration	11/10/2025	0.3	\$750.00	\$225.00	Justin Lo
Draft/revise Drafted Declaration of Justin Lo ISO Motion for Final Approval of Class and PAGA Settlement	11/10/2025	1.3	\$750.00	\$975.00	Justin Lo
Draft/revise Drafted Declaration of Marta Aguilar ISO Motion for Final Approval of Class and PAGA Settlement	11/10/2025	0.7	\$750.00	\$525.00	Justin Lo
Analyze Review motion for final approval and all associated declarations	11/13/2025	1.4	\$750.00	\$1,050.00	Justin Lo
		111.10	\$83,265.00 USD		

EXHIBIT D

EXPENSE	DATE	PRICE	TOTAL	QTY	MATTER
Postage LC 226 Request Letters for Client's Personnel File	5/13/2021	\$4.16	\$8.32	2	Aguilar v Elder Care Alliance (PAGA)
Postage Mailing of PAGA Notice	5/13/2021	\$4.16	\$8.32	2	Aguilar v Elder Care Alliance (PAGA)
Courtfees PAGA Notice	5/13/2021	\$75.00	\$75.00	1	Aguilar v Elder Care Alliance (PAGA)
Uncategorized Research regarding other filings against Defendants from UniCourt	7/28/2021	\$11.30	\$11.30	1	Aguilar v Elder Care Alliance (PAGA)
Courtfees E-Filing Documents: Complaint Summons Civil Case Cover Sheet	8/5/2021	\$562.45	\$562.45	1	Aguilar v Elder Care Alliance (PAGA)
Courtfees Service of Process	8/6/2021	\$114.35	\$114.35	1	Aguilar v Elder Care Alliance (PAGA)
Courtfees Service of Process	9/7/2021	\$114.35	\$114.35	1	Aguilar v Elder Care Alliance (PAGA)
Courtfees Documents: Notice of Case Management Statement	10/19/2021	\$110.20	\$110.20	1	Aguilar v Elder Care Alliance (PAGA)
Courtfees Case Management Conference	11/29/2021	\$34.95	\$34.95	1	Aguilar v Elder Care Alliance (PAGA)

EXPENSE	DATE	PRICE	TOTAL	QTY	MATTER
Berger Consulting Group Berger Consulting Group- Wage Statement and Time Card Analysis	8/12/2022	\$1,500.00	\$1,500.00	1	Aguilar v Elder Care Alliance (PAGA)
Mediation Mediation Fees for Mark Rudy	3/20/2023	\$3,125.00	\$3,125.00	1	Aguilar v Elder Care Alliance (PAGA)
Berger Consulting Group Berger Analysis For Wage Statements and Time Records	3/23/2023	\$4,007.50	\$4,007.50	1	Aguilar v Elder Care Alliance (PAGA)
Courtfees E-Filing Documents: Joint Case Management Statement	7/17/2023	\$36.90	\$36.90	1	Aguilar v Elder Care Alliance (PAGA)
Courtfees E-Filing Ntc of Settlement	7/25/2023	\$29.95	\$29.95	1	Aguilar v Elder Care Alliance (PAGA)
Courtfees E-Filing Joint Status Conference Statement	3/25/2024	\$20.55	\$20.55	1	Aguilar v Elder Care Alliance (PAGA)
Rapid Legal Case Management Statement	7/2/2024	\$20.55	\$20.55	1	Aguilar v Elder Care Alliance (PAGA)
			\$9,779.69 USD		