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Case #21CV386800
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Attorney for Plaintiffs Humberto Reyes Monreal and Pedro Gonzalez

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

HUMBERTO REYES MONREAL, on behalf of
himself and all others similarly situated;

Plaintiffs,

v.

DINSMORE ENTERPRISES, INC. d.b.a.
ALPINE LANDSCAPES, a California
Corporation, and DOES 1 through 50 inclusive,

Defendants.

Case No.: 21CV386800

[Assigned for all purposes to the Hon. Charles F.
Adams, Dept. 7]

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF ANNA R. SALUSKY IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT AND REQUEST FOR
AWARD OF ATTORNEY'S FEES, COSTS,
AND CLASS REPRESENTATIVE PAYMENTS**

[Concurrently filed with the Notice of Motion and
Motion; Memorandum of Points and Authorities;
Supplemental Declarations of Humberto Reyes
Monreal and Pedro Gonzalez; the Declaration of
Garvin Brown; and [Proposed] Order and
Judgment]

Date: August 14, 2025
Time: 1:30 p.m.
Dept.: 7

Action filed: September 17, 2021

**DECLARATION OF ANNA R. SALUSKY IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT AND REQUEST FOR AWARD OF
ATTORNEY'S FEES, COSTS, AND CLASS REPRESENTATIVE PAYMENTS**

1 I, Anna R. Salusky, declare:

2 1. I am an attorney admitted and licensed to practice law in the State of California. I am the
3 managing shareholder of Salusky Law Group (“Salusky Law Group”) in Long Beach, California.
4 Salusky Law Group is counsel of record for Plaintiffs Humberto Reyes Monreal and Pedro Gonzalez
5 (“Plaintiffs”) in the above-captioned matter. I have personal knowledge of the matters set forth herein,
6 except if otherwise stated. If called as a witness, I could and would competently testify to the
7 information set forth below.

8 2. I submit this declaration in support of Plaintiffs’ Motion for Final Approval of Class
9 Action and PAGA Settlement and Request for Attorney’s Fees, Costs, and Class Representative
10 Payments (“Motion for Final Approval” or “Motion”), which is filed concurrently herewith.

11 3. I have no knowledge of any conflicting interests between my firm and any of its
12 attorneys on the one hand, and Plaintiffs or any other Settlement Class Member, on the other hand.

13 **MY CLASS ACTION EXPERIENCE**

14 4. I am currently handling the day-to-day responsibilities and litigation strategy for nine (9)
15 wage and hour class action lawsuits. I have co-counsel on seven (7) of the nine (9) cases. Before
16 starting my own firm in 2021, I served as the managing partner at Mahoney Law Group, APC
17 (“MLG”).

18 5. In my role as managing partner at MLG, I estimate that I supervised approximately 150
19 wage and hour class actions at any given time. This included managing the litigation strategy, selection
20 of experts, formulation of the trial plan, providing direction regarding key depositions to take, review
21 and approval of Belaire West notices, motions for class certification, motions for preliminary approval,
22 motions for final approval, mediation briefs and settlement agreements. I regularly attended mediations
23 and negotiated settlements. I also took key depositions of the person most qualified and percipient
24 witnesses and defended depositions of our class representatives. I was responsible for training attorneys
25 in our office on how to take an effective deposition, how to prepare our class representative clients for
26 deposition, how to frame the issues and prepare for a successful mediation, and how to gather the
27 necessary evidence to prevail on a motion for class certification.

6. A sampling of the cases I have recently worked on is included in my previously filed declaration in support of Plaintiffs' Motion for Preliminary Approval in this action.

DISTRIBUTION OF THE CLASS NOTICE SATISFIES DUE PROCESS

7. On February 25, 2024, this Court granted Plaintiffs' Motion for Preliminary Approval of Class and PAGA Settlement. In granting preliminary approval of the Settlement, the Court found the form of notice was generally adequate but ordered modifications to the instructions for opting out and appearances at the final fairness hearing. The Court approved the notice procedures. Class Counsel then modified the Class Notice instructions in accordance with the Court's Order.

8. In the five (5) months since the Court granted preliminary approval of the Settlement, the Parties and the Administrator, ILYM Group, Inc., have carried out the notice procedures set forth in the Settlement Agreement, details of which are described in the Declaration of Garvin Brown Regarding Notice and Settlement Administration ("Brown Decl."), filed concurrently herewith. The Class Notice, as modified per the Court's Order, is attached as **Exhibit A** to the Declaration of Garvin Brown.

9. Per the Settlement Agreement, the parties will proceed with distribution of the Individual Class Payments upon the Court's final approval of this Settlement. Class Members will have 180 calendar days to cash their settlement payments checks. (Settlement Agreement, § 4.4.1.)

THE SETTLEMENT WAS WELL RECEIVED

10. The deadline for Class Members to request exclusion or submit written objections to the Settlement was May 20, 2025. (Brown Decl., ¶¶ 11-12.) I am informed that, as of the date of this declaration, there has been no requests for exclusion and no objections to the Settlement. (*Id.*, ¶¶ 11-12.) This represents a 100% participation rate among 285 Class Members. (*Id.*, ¶ 14.)

11. To make it easier for Class Members to get their questions answered, the Class Notice mailed to Class Members contained my firm's address and phone number. (Brown Decl., ¶ 7, Ex. A.) In addition, the Class Notice clearly indicates the estimated Individual Class Payment that each Class Member was eligible to receive. (*Ibid.*) This was helpful for Class Members to understand and consider their anticipated Individual Class Payment before deciding whether to participate in the Settlement.

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1 12. No Class Member who received notice of their anticipated Individual Class Payment
2 objected or requested exclusion from the Settlement. (Brown Decl., ¶¶ 11-13.) A total of 41 Class
3 Notices were returned to the Administrator as undeliverable. (*Id.*, ¶ 8.) I am informed that the
4 Administrator performed skip traces on these undeliverable notices, was able to obtain 12 updated
5 addresses, and promptly re-mailed Class Notices to those 12 Class Members. (*Id.*, ¶¶ 8-9.) I am
6 informed that the remaining 29 returned Class Notices were deemed undeliverable, as no updated
7 addresses were found, notwithstanding the skip tracing. (*Id.*, ¶ 10.)

8 13. I believe the overwhelming positive reaction by Class Members supports a finding that
9 the Settlement is fair, reasonable, and adequate, and should receive final approval.

10 **THE SETTLEMENT TERMS ARE FAIR, ADEQUATE, AND REASONABLE**

11 14. Throughout this litigation, my firm performed a significant amount of work to fully
12 evaluate the strengths and weaknesses of the claims asserted. This includes a substantial factual
13 investigation; extensive formal and informal discovery; the review and analysis of hundreds of
14 documents, including handbooks, written policies and procedures, and timekeeping and payroll records;
15 obtaining contact information for Class Members and contacting Class Members to question them
16 about claims in this case; working with my expert to obtain a thorough damage analysis; preparing a
17 mediation brief; and participation in a full-day mediation with Steve Rottman, a highly respected and
18 experienced mediator, who is well-versed in wage and hour class actions.

19 15. The information obtained before mediation allowed the parties to properly evaluate the
20 strengths and weaknesses of the claims. At all times, the parties' negotiations were hard-fought and
21 conducted at arm's length between attorneys with substantial experience litigating wage and hour class
22 actions. With the assistance of Mr. Rottman, the parties were able to reach a class-wide settlement of
23 the claims asserted. I believe the information obtained and exchanged was sufficient for the parties to
24 make an informed decision about this Settlement, which is objectively fair, adequate, and reasonable.

25 16. Indeed, based on my experience in this type of litigation, I believe that the Settlement
26 represents an excellent result for the Class. As detailed in my Declaration of Anna R. Salusky in
27 Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement,
28 although Plaintiffs and Class Counsel compromised to achieve the Settlement, the compromise is

1 extremely reasonable considering the substantial risks involved in pursuing further litigation.

2 17. The Settlement Agreement provides that Defendants will pay \$460,000 (the “Gross
3 Settlement Amount”) to resolve the claims asserted in this matter. (Settlement Agreement, § 1.22.) The
4 Net Settlement Amount will be the amount of the Gross Settlement Amount remaining to distribute to
5 Participating Class Members after deducting: (a) the Class Counsel Fees and Litigation Expenses
6 Payments; (b) the PAGA Penalties; (c) a Class Representative Payments to Plaintiffs Humberto Reyes
7 Monreal and Pedro Gonzalez; and (d) the Administration Expenses Payment. (*Id.*, § 1.28.) The Net
8 Settlement Amount is currently estimated to be \$241,941. (Brown Decl., ¶ 15.)

9 18. The financial relief provided by the Settlement is commensurate with the monetary risks
10 Plaintiffs and their counsel would face should the litigation continue. As set forth in my previous
11 declaration, while the Settlement represents a significant discount on my firm’s estimate of maximum
12 potential financial exposure to Defendants if Plaintiffs established liability on all claims and recovered
13 the full estimated damages and penalties, this compromise is reasonable given the substantial risks that
14 Plaintiffs and the Class faced in this action.

15 19. Continued litigation would undoubtedly be costly and time-consuming, and an appeal
16 from any judgment would likely occur, resulting in significant delays before this case could finally be
17 resolved. In addition, several significant impediments to a full or realistic recovery exist that justify the
18 discounts applied to Plaintiffs’ claims, particularly in light of the relative strength of Defendant’s
19 defenses, and the existence of potential variations among Class Members - which could have likely
20 reduced the overall value of the claims, if not devalued them altogether.

21 20. In reaching this Settlement, I carefully considered the strength of the case versus the
22 amount offered in settlement, as well as the risk, expense, and complexity of obtaining and maintaining
23 class certification through trial. I analyzed the merits of the class and representative claims, and each
24 one presented significant hurdles.

25 21. In light of these issues, the Gross Settlement Amount of \$460,000 is an excellent result
26 for the 285 Class Members, given the parties’ conflicting evidence and the risks continued litigation
27 would present. The Settlement commits Defendants to creating a Gross Settlement Amount from which
28 Participating Class Members will derive a significant financial recovery for the violations alleged and

1 extinguish the risks of further litigation and any appeals that would likely be filed following a judgment
2 in Plaintiffs' favor. Such efforts would likely result in a delay of several years before this case would be
3 resolved, with no guarantee of recovery, whereas the Settlement provides for an estimated average
4 gross payment of \$841.46 for each Participating Class Member (See Brown Decl., ¶ 16.), placing it
5 well within the range of reasonableness. Aggrieved Employees will receive an additional estimated
6 average payment of \$8.77. (Id., ¶ 17.)

7 22. The Settlement is also fair, adequate, and reasonable when one takes into consideration
8 the amount of the Class Representative Payments to the named Plaintiffs, and the amount of the
9 requested attorneys' fees and costs to Class Counsel, particularly in light of the time and effort Class
10 Counsel put into this case in order to achieve the Settlement. The specific amounts associated with each
11 of these payments were clearly disclosed in the Class Notice, and the fact that the Class
12 overwhelmingly supports the Settlement, including the payment of these requested amounts, meets the
13 standards of fairness, reasonableness, and adequacy.

14 23. On February 25, 2025, this Court found on a preliminary basis that the Settlement
15 should be approved and held that (1) considering the portion of the case's value attributable to
16 uncertain penalties, claims that could be difficult to certify for class treatment, and the multiple,
17 dependent contingencies that Plaintiffs would have had to overcome to prevail on their claims, the
18 settlement achieves a good result for the class; and that (2) the Settlement is fair and reasonable to the
19 Class. See Court's Order Granting Plaintiffs' Motion for Preliminary Approval.

20 24. Nothing has changed since that date that should alter the Court's reasoning in granting
21 final approval. I believe I have the requisite experience to give a reasoned opinion on this Settlement,
22 and, based upon my familiarity with the factual and legal issues in this case, it is my opinion that the
23 Settlement is fair, reasonable, adequate, and should receive final approval.

24 **THE SERVICE PAYMENTS TO PLAINTIFFS ARE JUSTIFIED**

25 25. The Settlement Agreement provides that Plaintiffs may request Class Representative
26 Payments of up to \$10,000 each, for a total of \$20,000. (Settlement Agreement, § 3.2.1.) The Class
27 Representative Payment to each named Plaintiff is in addition to any payments that Plaintiffs are
28 entitled to as Class Members and Aggrieved Employees. (*Ibid.*) The requested Class Representative

1 Payments were disclosed to the members of the Class in the Class Notice. (Brown Decl., ¶ 7, Ex. A.)

2 26. Plaintiffs' active participation in the litigation allowed my firm to negotiate a settlement
3 that confers significant benefits to the Class and is in the best interest of the Class Members. The
4 information they provided was instrumental to my understanding of the claim and defenses in this case.

5 27. Based on my experience, it is in my opinion that the requested Class Representative
6 Payments to Plaintiffs are reasonable and warranted in light of the time and effort they spent working
7 on this case and the benefit their efforts conferred upon the Class. Plaintiffs spent a significant amount
8 of time during the course of this action assisting my firm with its investigation. For example, Plaintiffs
9 kept in contact with my office and provided relevant and helpful information for this litigation. Plaintiff
10 Reyes responded to written discovery, and both Plaintiffs were deposed and participated in mediation.
11 At all times, Plaintiffs remained cognizant of their obligations and duties to the members of the Class.

12 28. Over the course of the litigation, Plaintiff Reyes estimates that he spent about 68.65
13 hours on this action, and Plaintiff Gonzalez estimates he spent about 37.25 hours on this action. The
14 details of Plaintiffs' activities are described in their previously filed declarations, and their respective
15 estimated time spent on the case is stated in their concurrently filed supplemental declarations.

16 29. The requested Class Representative Payments are fair and reasonable when compared to
17 the payments approved in similar cases, with which I am familiar. The \$10,000 Class Representative
18 Payments to each Plaintiff represents 2.2% (4.4% total) of the Gross Settlement Amount of \$460,000
19 and is well within the acceptable range awarded in similar cases. Considering the significant benefit
20 Plaintiffs secured for the Class, the Class Representative Service Payments are clearly fair and
21 reasonable.

22 30. My firm spent a considerable amount of time communicating and working with
23 Plaintiffs, both of whom provided factual information and documentation that was critical to our
24 understanding of the case. Plaintiff Reyes provided my firm with the necessary information to evaluate
25 the case, prepare and send the PAGA notice, and draft and file the complaint. He also spent several
26 hours working with my firm to respond to extensive written discovery. Plaintiff Gonzalez joined the
27 action via the first amended complaint. As he was employed in Defendant's largest department
28 ("maintenance"), Plaintiff Gonzalez's presence significantly improved the prospects of proceeding on a

1 class basis. Plaintiffs took the time to explain Defendant's policies and practices related to the claims
2 raised in the lawsuit, which were instrumental to my understanding of the claims and defenses in the
3 litigation. All of this was used in solidifying arguments used to negotiate a fair and reasonable
4 settlement at mediation. In addition, both Plaintiffs gave depositions in this action, which also entailed
5 time preparing and travelling to my office take part in the remote depositions.

6 31. Plaintiffs have been involved in the litigation, worked diligently to represent the
7 members of the Class, and have put the interest of the Class above their own self-interest. They have
8 remained cognizant of their obligations and duties to the members of the Class.

9 32. Plaintiffs also assumed the risk of an adverse judgment and the financial responsibility
10 of such a judgment by maintaining this litigation. By stepping forward and attaching their names to this
11 litigation, Plaintiffs jeopardized, and continue to jeopardize, the availability of prospective employment
12 because their names are now associated with employment litigation, particularly in the internet age,
13 where prospective employers may easily discover such information with a simple internet search.

14 33. Furthermore, under the terms of the Settlement, Plaintiffs waived their rights under Civil
15 Code section 1542, a waiver that was not required of other Class Members.

16 34. In my experience, there are few individuals who are willing to come forward to serve as
17 a named representative and to provide the hard work, diligence and personal financial risk that may
18 come with undertaking such a role. Plaintiffs did not waver and performed their duties without
19 exception, demonstrating that they acted in the best interest of the Class. In absence of Plaintiffs'
20 participation and efforts, there would be no recovery for the Class.

21 35. The requested \$10,000 Class Representative Service Payment to each Plaintiff (for a
22 total of \$20,000) is fair and reasonable in light of Plaintiffs' efforts on behalf of the Class and the
23 benefits their efforts conferred upon the Class.

24 **THE REQUESTED CLASS COUNSEL FEES PAYMENT IS REASONABLE**

25 36. The Settlement Agreement provides that Class Counsel may seek an award of attorney's
26 fees of \$153,333, which represents one-third of the Gross Settlement Amount, plus a Class Counsel
27 Expenses Payment not to exceed \$28,000. (Settlement Agreement § 3.2.2.)
28

1 37. I believe an award of attorney's fees in the amount of \$153,333.00 is fair, reasonable,
2 and appropriate here because of the sizable amount of work performed by my firm in this case over
3 nearly four years, the great benefits conferred upon the Class, the complexity of issues involved in the
4 litigation, and the associated risks born by my firm in prosecuting this action on a pure contingency
5 basis.

6 38. The Settlement is an outstanding result for the Class Members. Equity dictates that those
7 members of the Class who benefit from this Settlement should contribute a pro rata share towards the
8 payment of attorney's fees that brought about the Settlement.

9 39. In my experience, plaintiffs in employment litigation cases are typically unable to pay
10 their attorneys on an hourly basis and can only obtain representation if they can find counsel who are
11 willing to accept their case on a contingent basis and advance either all or a significant portion of the
12 costs. To that end, it is important that competent counsel is incentivized to bring complex and risky
13 contingency cases such as this by awarding attorneys' fees that are commensurate with the fees that the
14 attorneys would have received had they negotiated a fee arrangement with the class ex ante.

15 40. My firm undertook this litigation on a contingent-fee basis, assuming a significant risk
16 that the litigation would yield no recovery for the substantial investment of time, resources, and costs
17 expended. Unlike counsel for Defendant, who are paid an hourly rate and reimbursed for their expenses
18 on a regular basis, Class Counsel has not been compensated for any of its time or expenses to date.

19 41. Here, the requested one-third attorney's fee award constitutes a fair market charge to the
20 Class for the benefits conferred by the Settlement, as Class Counsel's skill in negotiating the Settlement
21 resulted in the substantial benefit that Participating Class Members will now share, without the need to
22 submit a claim form.

23 42. In making a fee request in complex class actions such as this, I always analyze the
24 factors that a court must consider in awarding attorneys' fees. I believe the circumstances in this case
25 justify the requested \$153,333 fee award because of: (a) the knowledge and skill that Class Counsel
26 provided for Plaintiffs and the Class; (b) the complexity of the issues involved in this litigation; (c) the
27 amount of work involved in achieving a substantial benefit for the Class Members by bringing the
28 action to an efficient resolution prior to trial; and (d) the associated risks borne by my firm by litigating

1 this matter on a purely contingency basis.

2 43. From the beginning, this case presented unique challenges, both factually and legally,
3 and liability was highly contested. While Defendants vigorously opposed Plaintiffs' claims, I believe
4 that my knowledge and experience, combined with my firm's persistent efforts, enabled me to work
5 through these issues and combat Defendants' defense. As discussed in declaration in support of
6 Plaintiffs' Motion for Preliminary Approval, Dinsmore Enterprises consistently denied all allegations in
7 the operative complaint, and the result achieved by this Settlement was due, in large part, to my
8 knowledge, experience, and commitment to the Class. I believe an award of one-third of the Gross
9 Settlement Amount represents fair compensation for the high quality of work and results achieved.

10 44. Salusky Law Group has incurred substantial risk and expense in order to achieve the
11 ultimate result in this litigation. My firm assumed the risk and cost of this litigation since its inception
12 in September 2021, on a pure contingency basis. For instance, my firm has prepared and prosecuted the
13 lawsuit, advanced all costs, and deferred payment of fees with no guarantee that any of the fees or
14 litigation costs incurred would ever be recovered. My firm was also precluded from taking other fee-
15 generating employment, as this action occupied a significant amount of my firm's time and resources.
16 In addition, my firm brought in co-counsel on other retained cases, to allow me to devote sufficient
17 time and resources to this case.

18 45. The reasonableness of the requested \$153,333 attorney's fee award is further supported
19 by the lodestar cross-check. There has been a significant amount of work performed by my firm in this
20 action. The hours worked do not include the time that will be spent attending the final approval hearing,
21 or the time spent ensuring that the settlement funds are distributed in accordance with the Court's order
22 and Settlement Agreement.

23 46. My firm keeps contemporaneous billing records, which reflect time billed in one-tenth
24 of an hour increments. After exercising billing discretion, my firm's total lodestar through July 22,
25 2025, is \$197,435, which represents a total of 351.1 hours of work over nearly four years in this action.
26 Attached as **Exhibit 1** is a true and correct copy of my firm's billing records for this matter.

27 47. The billing rates of the lawyers and paralegal who worked on this case are as follows:
28 (1) Anna R. Salusky (attorney), \$850; (2) Dionisios Aliazis (attorney), \$700; and (3) Jerin Wilkinson

(paralegal), \$175. These rates reflect the usual and customary rates charged by my firm in contingency cases. Wage and hour litigation forms a significant part of my firm's work, and we have a high level of skill and competence in this field of litigation. The hourly rates are fair and reasonable given the nature and complexity of this litigation and the experience level of the attorneys and paralegal above.

48. All of the time referenced above was well spent on litigating this case, including: the initial factual and legal investigation; drafting written notice to the LWDA; drafting pleadings; propounding and responding to multiple rounds of written discovery; reviewing and analyzing documents produced by Defendant; drafting and filing a motion to compel further discovery responses; taking and defending depositions; conducting legal research; working with a forensic expert to build a damage analysis; preparing for mediation, including drafting a mediation brief; negotiating the terms of a finalized Settlement Agreement; moving for preliminary approval; and monitoring the Class Notice process.

49. The hours spent prosecuting this litigation are not only reasonable but were necessary for the successful prosecution and recovery obtained on behalf of the Class Members.

50. I believe that an attorneys' fee award of \$153,333 is fair and reasonable given the complex issues presented in this litigation, the substantial amount of work performed, the risks that Class Counsel assumed in advancing all costs and deferring payment for nearly four years, the experience and reputation of Class Counsel, and the highly favorable result obtained for the Class.

51. Moreover, the requested fee award of one-third of the Gross Settlement Amount is well within the range of what is typically charged in the marketplace. Class Counsel's requested fees, as expressed and contemplated in the Settlement Agreement, were disclosed to the Class Members in the court-approved Class Notice and is in line with other settlements approved in California.

52. Having investigated, analyzed, and overcome the obstacles mounted against Plaintiffs' claims and negotiated an excellent result on behalf of the Class Members, Class Counsel should be compensated with a fee award that properly and reasonably compensates counsel for those efforts.

53. Under the terms of the Settlement, Class Counsel is permitted to seek reimbursement of reasonable litigation costs actually and necessarily incurred in prosecuting this action, not to exceed \$28,000 from the Gross Settlement Amount. (Settlement Agreement, § 3.2.2.)

1 54. My firm seeks reimbursement in the amount of \$25,876 for costs and expenses incurred
2 in connection with this litigation. Salusky Law Group maintains accounting books and records in its
3 ordinary course of business. The costs and expenses identified in the following summary are taken from
4 expense records and receipts. My firm's litigation costs in this action consist predominately of filing
5 fees, court fees, deposition transcript fees, copying, expert fees, and mediation fees. These expenses are
6 customarily billed to fee-paying clients and routinely reimbursed by state and federal courts. Attached
7 as **Exhibit 2** is the Client Expenses Report for this litigation.

8 55. I thoroughly reviewed the billing and expenses described above and certify to the Court
9 that these records accurately reflect the work performed and the expenses incurred in connection with
10 the litigation of this matter.

11 56. Class Counsel's request for reimbursement of actual litigation expenses of \$25,876 is
12 reasonable and all expenses were necessarily incurred in prosecuting this matter. Accordingly, I
13 respectfully request that the Court issue an order granting final approval of the requested attorneys' fees
14 and expenses.

15 **THE PAGA PENALTIES ARE REASONABLE, BUT THE ALLOCATION BETWEEN LWDA**
16 **AND AGGRIEVED EMPLOYEES MUST BE CORRECTED**

17 57. The Settlement Agreement provides for the allocation of civil penalties under PAGA in
18 the amount of \$10,000, of which 75-percent (\$7,500) will be paid to the LWDA, with the remaining
19 25-percent (\$2,500) to be distributed to Aggrieved Employees on a pro-rata basis based on the number
20 of PAGA Pay Periods worked during the PAGA Period. (Settlement Agreement, §§ 3.2.5-3.2.5.1.) The
21 PAGA Penalties were negotiated in good faith, were not a result of self-interest at the expense of
22 PAGA Employees, and \$10,000 for civil penalties under PAGA is within the range of similar amounts
23 included in other wage and hour class action settlements.

24 58. Although the total allocation of civil penalties under the PAGA is reasonable, **the**
25 **Parties erred in the allocation of the civil penalties** between the LWDA and Aggrieved Employees.

26 59. At the time the Parties agreed to terms of a settlement, Labor Code section 2699, subd.
27 (i) required that 75% of civil penalties recovered under the PAGA be distributed to California's Labor
28

1 and Workforce Development Agency (“LWDA”), and 25% of those penalties distributed to aggrieved
2 employees. However, **the PAGA was amended, effective July 1, 2024.**

3 60. Effective July 1, 2024, subdivision (m) of Labor Code section 2699 provided for an
4 increase of the aggrieved employees’ share of civil penalties recovered in PAGA actions. Under the
5 statutory revision, the **LWDA is to receive 65% of civil penalties recovered, and aggrieved**
6 **employees are to receive 35% of civil penalties recovered.** (Lab. Code, § 2699, subd. (m).)

7 61. I alerted counsel for Defendants of the error, and I respectfully ask the Court to correct
8 the error in allocation, by ordering that the \$10,000 allocated in the Settlement for civil penalties under
9 the PAGA be distributed as follows: 65% to the LWDA and 35% to the Aggrieved Employees. This
10 change in allocation does not alter the total amount allocated to civil penalties.

11 62. For the reasons stated above, I respectfully request that the Court issue an order granting
12 Plaintiff’s Motion for Final Approval of Class Action and PAGA Settlement and Request for Award of
13 Attorney’s Fees, Costs, and Class Representative Payments.

14 **POTENTIAL FEE DISPUTE**

15 63. In my declaration in support of Plaintiff’s Motion for Preliminary Approval of The Class
16 Action and PAGA Settlement, I disclosed a verbal fee sharing agreement with Jose Garay, APLC. In
17 that declaration, I noted that Plaintiff Reyes signed a consent form, but I could not locate any written
18 agreement with my firm and Jose Garay, APLC.

19 64. On January 27, 2025, My firm electronically served the moving papers for Plaintiffs’
20 Motion for Preliminary Approval of the Class Action and PAGA Settlement to the law office of Jose
21 Garay, APLC. After receipt of these papers, Jose Garay, APLC failed to move to intervene or file any
22 papers responding to the issue of a potential fee sharing agreement.

23 65. In its February 25, 2025, order, the Court stated in pertinent part, *“The Court has not*
24 *received a declaration from Mr. Garay. In the absence of a written agreement between counsel, the*
25 *Court cannot conclude a valid fee sharing agreement exists between Salusky Law Group and Jose*
26 *Garay, APLC, pursuant to California Rule of Professional Conduct 1.5.1(a)(1).”* On February 28,
27 2025, my office filed and electronically served Jose Garay, APLC with a copy of the Notice of Entry of
28 Order Granting Plaintiffs’ Motion for Preliminary Approval of Class Action and PAGA Settlement.

66. I fully disclosed this potential fee sharing agreement to this Court and served Jose Garay, APLC with Plaintiff's Motion for Preliminary Approval and supporting documents, which provided Jose Garay, APLC an opportunity to respond. However, Jose Garay, APLC failed to respond, and this Court found that it could not conclude that a valid fee sharing agreement exists. My firm performed the work on this case that led to the result that benefited the Class and Aggrieved Employees. Accordingly, and consistent with the decision in *Mark v. Spencer* (2008) 166 Cal.App.4th 219, I respectfully request that the award of attorney's fees and costs in this case have res judicata effect.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 22nd day of July 2025, at Long Beach, California.


Anna R. Salusky, Esq.

EXHIBIT 1

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Dispositive Motions WORK ON FINALIZING DECLARATION OF A. SALUSKY IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT.	BILLABLE	7/22/2025	0.7	\$850.00	\$595.00	ARS
Dispositive Motions WORK ON FINALIZING POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR FINAL APPROVAL.	BILLABLE	7/22/2025	5.2	\$700.00	\$3,640.00	DA
Dispositive Motions FINALIZE DECL. ARS WITH EXHIBITS; FINALIZE DECL. OF G. BROWN, FINALIZE DECLARATION OF P. GONZALEZ, FINALIZE DECLARATION OF H. REYES MONREAL, FINALIZE NOTICE OF MOTION FOR FINAL APPROVAL; PREP TABLE OF CONTENTS AND TABLE OF AUTHORITIES; FINALIZE MOTION FOR FINAL APPROV FINALIZE POS; SERVE VIA EMAIL; UPLOAD TO J&J FOR FILING.	BILLABLE	7/22/2025	4	\$175.00	\$700.00	JW
Dispositive Motions WORK ON REDLINES TO DECLARATION OF GARVIN BROWN AT ILYM. CONFER WITH G. BROWN RE SAME.	BILLABLE	7/21/2025	1.3	\$850.00	\$1,105.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Dispositive Motions WORK ON PROPOSED ORDER.	BILLABLE	7/21/2025	0.7	\$850.00	\$595.00	ARS
Dispositive Motions MULTIPLE COMMUNICATIONS WITH G. BROWN RE DECLARATION IN SUPPORT OF MOTION FOR FINAL APPROVAL.	BILLABLE	7/21/2025	0.2	\$850.00	\$170.00	ARS
Dispositive Motions EMAIL OPPOSING COUNSEL RE PROPOSED ORDER.	BILLABLE	7/21/2025	0.2	\$850.00	\$170.00	ARS
Dispositive Motions WORK ON DECLARATION OF A. SALUSKY IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT.	BILLABLE	7/21/2025	0.8	\$850.00	\$680.00	ARS
Review/analyze AUDIT COST REPORT TO FINALIZE AS AN EXHIBIT TO DECLARATION OF A. SALUSKY IN SUPPORT OF MOTION FOR FINAL APPROVAL.	BILLABLE	7/21/2025	0.8	\$850.00	\$680.00	ARS
Settlement REVIEW SETTLEMENT AGREEMENT. DRAFT SALUSKY DECLARATION AND MEMORANDUM OF POINTS AND AUTHORITIES.	BILLABLE	7/21/2025	6	\$700.00	\$4,200.00	DA

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Settlement REVIEW DRAFT DECLARATION OF GARVIN BROWN. REVIEW PRIOR CASE DOCUMENTS IN PREPARATION FOR DRAFTING MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT.	BILLABLE	7/20/2025	1.8	\$700.00	\$1,260.00	DA
Dispositive Motions WORK ON MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT.	BILLABLE	7/20/2025	3.9	\$700.00	\$2,730.00	DA
Dispositive Motions DRAFT NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT.	BILLABLE	7/20/2025	0.4	\$700.00	\$280.00	DA
Dispositive Motions DRAFT DECLARATON OF A. SALUSKY IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT.	BILLABLE	7/20/2025	1.4	\$700.00	\$980.00	DA
Manage data/files DOWNLOAD DOCUMENTS FROM OCSC DOCKET FOR DENNY (BERNARDO CASE); EMAIL DENNY; ENTER EXPENSES INTO PANTHER	BILLABLE	7/19/2025	1.1	\$175.00	\$192.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Dispositive Motions REVIEW DECLARATION FROM ILYM RE FINAL APPROVAL HEARING.	BILLABLE	7/18/2025	0.7	\$850.00	\$595.00	ARS
Review/analyze REVIEW REPORT FROM ILYM RE ESTIMATE OF PAYMENTS TO CLASS MEMBERS.	BILLABLE	7/18/2025	0.4	\$850.00	\$340.00	ARS
Communicate (in firm) CONFER WITH D. ALIAZIS RE MOTION FOR FINAL APPROVAL.	BILLABLE	7/18/2025	0.2	\$850.00	\$170.00	ARS
Dispositive Motions WORK ON DECLARATION OF H. REYES MONREAL IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT.	BILLABLE	7/18/2025	1.6	\$700.00	\$1,120.00	DA
Dispositive Motions WORK ON DECLARATION OF P. GONZALEZ IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT.	BILLABLE	7/18/2025	1.5	\$700.00	\$1,050.00	DA

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) MULTIPE COMMUNICATIONS WITH G. BROWN RE NOTICE TO H. REYES.	BILLABLE	6/6/2025	0.1	\$850.00	\$85.00	ARS
Review/analyze REVIEW FINAL REPORT FROM ILYM RE CLASS NOTICE.	BILLABLE	5/29/2025	0.2	\$850.00	\$170.00	ARS
Review/analyze REVIEW WEEKLY REPORT FROM ILYM.	BILLABLE	5/27/2025	0.2	\$850.00	\$170.00	ARS
Communicate (other external) CALL WITH MR. FERNANDEZ RE STATUS OF CLASS NOTICE.	BILLABLE	5/19/2025	0.6	\$850.00	\$510.00	ARS
Communicate (other external) MULTIPLE COMMUNICATIONS VIA EMAIL TO AND FROM G. BROWN WITH ILYM RE MR. FERNANDEZ'S CLASS NOTICE, ADMINISTRATOR WEBSITE.	BILLABLE	5/19/2025	0.3	\$850.00	\$255.00	ARS
Communicate (other external) EMAILS TO AND FROM J. GARAY RE SUPPLEMENTAL DECLARATION.	BILLABLE	5/12/2025	0.3	\$850.00	\$255.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) EMAILS TO AND FROM G. BROWN, CLAIMS ADMINISTRATOR RE STATUS OF NOTIFICATION TO CLASS MEMBERS.	BILLABLE	5/9/2025	0.2	\$850.00	\$170.00	ARS
Review/analyze REVIEW FILE AND UPDATE CASE PLAN.	BILLABLE	4/21/2025	0.1	\$850.00	\$85.00	ARS
Settlement REVIEW REPORT FROM CLAIMS ADMINISTRATOR.	BILLABLE	4/14/2025	0.2	\$850.00	\$170.00	ARS
Communicate (other external) EMAILS TO AND FROM CLAIMS ADMINISTRATOR RE ESCALATOR CLAUSE.	BILLABLE	3/21/2025	0.2	\$850.00	\$170.00	ARS
Communicate (other external) EMAIL G. BROWN AT ILYM RE CLASS NOTICE.	BILLABLE	3/17/2025	0.2	\$850.00	\$170.00	ARS
Manage data/files DOWNLOAD AND SAVE ILYM SETTLEMENT TIMELINE; CALENDAR DATES FROM TIMELINE	BILLABLE	3/4/2025	0.5	\$175.00	\$87.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files PREP NOTICE OF ENTRY OF PA ORDER; FINALIZE NOTICE OF ENTRY WITH EXHIBIT AND POS; SERVE VIA EMAIL; UPLOAD TO J&J FOR FILING; UPLOAD TO NETWORK FILE	BILLABLE	2/28/2025	0.4	\$175.00	\$70.00	JW
Dispositive Motions REVIEW ORDER GRANTING PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	2/27/2025	0.2	\$850.00	\$170.00	ARS
Communicate (other external) EMAILS TO AND FROM G. BROWN AT ILYM, RE ADMINISTRATION OF SETTLEMENT.	BILLABLE	2/25/2025	0.2	\$850.00	\$170.00	ARS
Communicate (with client) DRAFT EMAIL TO CLIENTS RE STATUS UPDATE.	BILLABLE	2/24/2025	0.2	\$850.00	\$170.00	ARS
Manage data/files EMAIL CORRESPONDENCE WITH SILVIA RE: PROPOSED PRELIMINARY APPROVAL ORDER.	BILLABLE	2/20/2025	0.2	\$175.00	\$35.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files TELEPHONE CORRESPONDENCE WITH D. ALIAZIS AND A. SALUSKY; CHECK J&J PORTAL FOR TIMING ON DELIVERY OF COURTESY COPY; SEARCH SANTA CLARA SUPERIOR COURT WEBSITE FOR DEPT INFO; CALL DEPT 7 RE SUBMITTING REVISED NOTICE.	BILLABLE	2/20/2025	0.4	\$175.00	\$70.00	JW
Court Mandated Conferences REVIEW TENTATIVE RULING RE MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	2/20/2025	0.6	\$850.00	\$510.00	ARS
Draft/revise WORK ON UPDATING NOTICE TO CLASS BASED ON COURT'S TENTATIVE.	BILLABLE	2/20/2025	0.7	\$850.00	\$595.00	ARS
Communicate (other external) CONFER WITH OPPOSING COUNSEL RE EDITS TO THE NOTICE TO CLASS, BASED ON TENTATIVE RULING FROM COURT.	BILLABLE	2/20/2025	0.3	\$850.00	\$255.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (in firm) CONFER WITH S. PACHECO RE UPDATING CLIENTS RE COURT GRANTED MOTION FOR PRELIMINARY APPROVAL AND NEXT STEPS.	BILLABLE	2/20/2025	0.2	\$850.00	\$170.00	ARS
Manage data/files SEARCH SANTA CLARA SUPERIOR COURT WEBSITE FOR REMOTE APPEARANCE INFO; ADD TO CALENDAR ENTRY.	BILLABLE	2/19/2025	0.3	\$175.00	\$52.50	JW
Manage data/files DOWNLOAD TENTATIVE RULING; EMAIL A. SALUSKY AND D. ALIAZIS RE SAME.	BILLABLE	2/19/2025	0.1	\$175.00	\$17.50	JW
Manage data/files CALENDAR MOTION FOR FINAL APPROVAL HEARING.	BILLABLE	2/19/2025	0.1	\$175.00	\$17.50	JW
Manage data/files FINALIZE DECLS REYES AND GONZALEZ ISO REQUEST FOR INCENTIVE AWARD WITH POS; SERVE VIA EMAIL; UPLOAD TO J&J PORTAL FOR FILING	BILLABLE	2/5/2025	0.5	\$175.00	\$87.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files DOWNLOAD CONFORMED COPIES OF PA MOTION; SAVE ON NETWORK; UPLOAD TO LWDA	BILLABLE	2/3/2025	0.6	\$175.00	\$105.00	JW
Review/analyze REVIEW NOTICE FROM LWDA RE SETTLEMENT. CONFER WITH J. WILKINSON RE SAME.	BILLABLE	1/29/2025	0.2	\$850.00	\$170.00	ARS
Manage data/files UPLOAD SETTLEMENT AGREEMENT TO LWDA; FINALIZE SUPPL DECL ARS WITH EXHIBIT AND POS; EMAIL ARS FOR REVIEW.	BILLABLE	1/29/2025	0.6	\$175.00	\$105.00	JW
Manage data/files SERVE SUPPL DECL ARS ISO PA VIA EMAIL; UPLOAD TO J&J FOR FILING	BILLABLE	1/29/2025	0.2	\$175.00	\$35.00	JW
Settlement WORK ON FINALIZING SUPPLEMENTAL DECLARATION.	BILLABLE	1/29/2025	0.4	\$850.00	\$340.00	ARS
Communicate (in firm) CONFER WITH S. PACHECO RE NOTIFYING CLIENTS IN SPANISH RE FILING OF PRELIMINARY APPROVAL PAPERS.	BILLABLE	1/29/2025	0.1	\$850.00	\$85.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Settlement WORK ON REDLINES TO SETTLEMENT AGREEMENT. CONFER WITH OPPOSING COUNSEL RE SAME.	BILLABLE	1/28/2025	0.6	\$850.00	\$510.00	ARS
Communicate (with client) CALL WITH H. REYES WITH A. DEANTES TRANSLATING RE UPDATES TO SETTLEMENT AGREEMENT.	BILLABLE	1/28/2025	0.3	\$850.00	\$255.00	ARS
Communicate (with client) CALL WITH P. GONZALEZ WITH A. DEANTES TRANSLATING RE UPDATES TO SETTLEMENT AGREEMENT.	BILLABLE	1/28/2025	0.3	\$850.00	\$255.00	ARS
Settlement FINALIZE SETTLEMENT AGREEMENT FOR SIGNATURES VIA DOCUSIGN. EMAIL EXECUTED AGREEMENT TO OPPOSING COUNSEL.	BILLABLE	1/28/2025	0.3	\$850.00	\$255.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files FINALIZE DECL. ARS WITH EXHIBITS; FINALIZE NOTICE OF MOTION FOR PRELIMINARY APPROVAL; PREP TABLE OF CONTENTS AND TABLE OF AUTHORITIES; FINALIZE MPA ISO PA WITH TABLES; PREP DRAFT PROOF OF SERVICE; EMAIL ARS; FINALIZE POS; SERVE VIA EMAIL; UPLOAD TO J&J FOR FILING	BILLABLE	1/27/2025	4.3	\$175.00	\$752.50	JW
Settlement WORK ON DECLARATION OF ANNA R. SALUSKY IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	1/27/2025	2.2	\$850.00	\$1,870.00	ARS
Settlement MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL RE SETTLEMENT AGREEMENT.	BILLABLE	1/27/2025	0.4	\$850.00	\$340.00	ARS
Settlement WORK ON PROPOSED ORDER RE MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	1/27/2025	0.5	\$850.00	\$425.00	ARS
Settlement WORK ON POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	1/27/2025	1.9	\$850.00	\$1,615.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Settlement WORK ON NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	1/27/2025	0.3	\$850.00	\$255.00	ARS
Settlement CONFER WITH J. WILKINSON RE FINALIZING AND FILING MOTION FOR PRELIMINARY APPROVAL AND SUPPORTING DOCUMENTS.	BILLABLE	1/27/2025	0.2	\$850.00	\$170.00	ARS
Settlement MULTIPLE COMMUNICATIONS WITH CLIENTS RE MOTION FOR PRELIMINARY APPROVAL, WITH A. DEANTES TRANSLATING.	BILLABLE	1/27/2025	0.6	\$850.00	\$510.00	ARS
Settlement WORK ON MEMORANDUM AND DECLARATION OF ARS ISO PRELIMINARY APPROVAL.	BILLABLE	12/30/2024	4.5	\$700.00	\$3,150.00	DA
Settlement WORK ON MEMORANDUM ISO PRELIMINARY APPROVAL.	BILLABLE	12/29/2024	4.7	\$700.00	\$3,290.00	DA
Settlement WORK ON DECLARATION OF ARS ISO PRELIMINARY APPROVAL.	BILLABLE	12/28/2024	7.8	\$700.00	\$5,460.00	DA

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Written Discovery REVIEW FILE. EDIT DECLARATION OF A. SALUSKY ISO MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	12/25/2024	3	\$700.00	\$2,100.00	DA
Manage data/files EMAIL CORRESPONDENCE WITH D. ALIAZIS RE MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	12/23/2024	0.4	\$175.00	\$70.00	JW
Settlement REVIEW DEPOSITION TRANSCRIPT OF P. GONZALEZ AND THE OPERATIVE COMPLAINT. DRAFT AND EDIT DECLARATION OF A. SALUSKY ISO MOTION FOR PA.	BILLABLE	12/15/2024	4	\$700.00	\$2,800.00	DA
Settlement REVIEW RECORD OF FILINGS AND SELECTED FILINGS IN THIS CASE. REVIEW DISCOVERY PROPOUNDED BY PLAINTIFF AND RESPONSES THERETO. EDIT AND DRAFT DECLARATION OF A. SALUSKY ISO MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	12/14/2024	5	\$700.00	\$3,500.00	DA
Communicate (other external) EMAIL ROWENA WALKER RE RESERVING HEARING FOR MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	8/22/2024	0.1	\$175.00	\$17.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) EMAIL CORRESPONDENCE WITH OPC; EMAIL ROWENA WALKER FOR NEW PA DATE	BILLABLE	8/21/2024	0.3	\$175.00	\$52.50	JW
Manage data/files REVIEW ROWENA WALKER EMAIL; CHECK PANTHER (SILVIA ALREADY CAL'D NEW HEARING DATE); CALENDAR REMINDER TO FILE PA MOTION ASAP	BILLABLE	8/21/2024	0.3	\$175.00	\$52.50	JW
Communicate (in firm) EMAIL ARS RE FOLLOW UP ON DATES FOR MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT.	BILLABLE	8/20/2024	0.2	\$175.00	\$35.00	JW
Communicate (other outside counsel) EMAIL OPC WITH AVAILABLE DATES FOR NEW PA HEARING	BILLABLE	8/20/2024	0.2	\$175.00	\$35.00	JW
Manage data/files EMAIL ROWENA WALKER FOR AVAILABILITY FOR RESCHEDULED HEARING PA; EMAIL ARS	BILLABLE	8/16/2024	0.2	\$175.00	\$35.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (in firm) REVIEW EMAIL FROM ROWENA WALKER WITH HEARING DATE AVAILABILITY; EMAIL ARS	BILLABLE	8/16/2024	0.1	\$175.00	\$17.50	JW
Communicate (other external) EMAILS TO AND FROM R. BROWN RE SETTLEMENT.	BILLABLE	8/9/2024	0.2	\$850.00	\$170.00	ARS
Communicate (in firm) CONFER WITH D. ALIAZIS RE MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	7/17/2024	0.3	\$850.00	\$255.00	ARS
Communicate (other external) EMAILS TO AND FROM R. BROWN RE PRELIMINARY APPROVAL.	BILLABLE	7/17/2024	0.2	\$850.00	\$170.00	ARS
Communicate (in firm) CONFER WITH S. PACHECO RE INTERVIEWS WITH CLASS MEMBERS.	BILLABLE	7/17/2024	0.2	\$850.00	\$170.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Settlement RESEARCH CASE FILE. PREPARE DECLARATION OF A. SALUSKY. READ CASE DOCUMENTS, INCLUDING MINUTE ORDERS, STIPULATIONS AND ORDERS, CASE MANAGEMENT STATEMENTS, DECLARATIONS BY LANDSCAPE EMPLOYEES, AND DISCOVERY RESPONSES FROM DINSMORE ENTERPRISES. DRAFT AND SEND EMAILS TO A. SALUSKY RE SAME.	BILLABLE	7/13/2024	5	\$700.00	\$3,500.00	DA
Settlement REVIEW MEDIATION BRIEF, EMPLOYEE HANDBOOKS, AND OTHER DOCUMENTS PRODUCED IN THIS CASE. RESEARCH RELEVANT AUTHORITY. DRAFT AND SEND EMAIL TO ANNA PROVIDING MY VIEW ON THE SETTLEMENT.	BILLABLE	7/13/2024	4.5	\$700.00	\$3,150.00	DA
Communicate (other external) MULTIPLE EMAILS TO AND FROM OPPOSING COUNSEL RE PRELIMINARY APPROVAL.	BILLABLE	7/12/2024	0.3	\$850.00	\$255.00	ARS
Communicate (in firm) CONFER WITH D. ALIAZIS RE PAGA PERIOD, AGGRIEVED EMPLOYEES.	BILLABLE	7/12/2024	0.3	\$850.00	\$255.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) EMAILS TO AND FROM R. MASON RE PAGA PERIODS, WORKWEEKS.	BILLABLE	7/8/2024	0.2	\$850.00	\$170.00	ARS
Communicate (other external) EMAILS TO AND FROM DEFENSE COUNSEL RE ADDITIONAL INFORMATION NEEDED FOR PRELIMINARY APPROVAL MOTION.	BILLABLE	7/3/2024	0.2	\$850.00	\$170.00	ARS
Manage data/files REVIEW OPC EMAIL RE INADVERTENT EMAIL SENT; REPLY RE DELETED	BILLABLE	7/3/2024	0.1	\$175.00	\$17.50	JW
Settlement EDIT CLASS SETTLEMENT AGREEMENT AND NOTICE. EMAIL BOTH TO DEFENSE COUNSEL.	BILLABLE	7/3/2024	1	\$700.00	\$700.00	DA
Settlement EMAILS TO AND FROM OPPOSING COUNSEL RE SETTLEMENT AGREEMENT AND CLASS NOTICE.	BILLABLE	6/26/2024	0.5	\$700.00	\$350.00	DA
Communicate (with client) REVIEW FILE AND UPDATE CASE PLAN.	BILLABLE	6/25/2024	0.2	\$850.00	\$170.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Settlement REVIEW SETTLEMENT AGREEMENT, NOTICE, AND GUIDELINES FOR CLASS ACTION SETTLEMENTS AND NOTICE, IN PREPARATION FOR CALL WITH OPPOSING COUNSEL. CALL WITH OPPOSING COUNSEL TO DISCUSS SETTLEMENT AGREEMENT AND CLASS NOTICE. REVISE SETTLEMENT AGREEMENT AND CLASS NOTICE.	BILLABLE	6/24/2024	3.5	\$700.00	\$2,450.00	DA
Communicate (other external) CALL WITH R. MASON AND D. ALIAZIS RE SETTLEMENT TERMS AND PRELIMINARY APPROVAL MOTION.	BILLABLE	6/24/2024	0.4	\$850.00	\$340.00	ARS
Manage data/files DOWNLOAD AND SAVE ADMIN QUOTES INCLUDING SPANISH TRANSLATION; EMAIL ARS	BILLABLE	6/20/2024	0.3	\$175.00	\$52.50	JW
Communicate (other external) MULTIPLE EMAILS TO AND FROM R. MASON RE SETTING UP CALL.	BILLABLE	6/19/2024	0.2	\$850.00	\$170.00	ARS
Manage data/files REVIEW ADMIN QUOTES FOR SPANISH TRANSLATION; EMAIL CORRESPONDENCE WITH ARS	BILLABLE	6/18/2024	0.3	\$175.00	\$52.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files EMAIL RUST, ILYM AND CPT FOR UPDATED QUOTES THAT INCLUDE SPANISH TRANSLATION;	BILLABLE	6/18/2024	0.3	\$175.00	\$52.50	JW
Settlement WORK ON LONG FORM SETTLEMENT AGREEMENT AND CLASS NOTICE.	BILLABLE	6/16/2024	5.8	\$700.00	\$4,060.00	DA
Settlement DRAFT LONG FORM SETTLEMENT AGREEMENT.	BILLABLE	6/15/2024	4	\$700.00	\$2,800.00	DA
Manage data/files REVIEW FILE FOR ADMIN QUOTES; EMAIL ARS; REVIEW EMAILS FOR WHETHER ADMIN WAS SELECTED; EMAIL ARS	BILLABLE	6/11/2024	0.5	\$175.00	\$87.50	JW
Communicate (in firm) CONFER WITH D. ALIAZIS RE PRELIMINARY APPROVAL AND SETTLEMENT.	BILLABLE	6/10/2024	0.2	\$750.00	\$150.00	ARS
Court Mandated Conferences REVIEW NOTICE RE CMC VACATED AND NEW DATE FOR MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	3/27/2024	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files REVIEW ROWENA WALKER EMAIL; CALENDAR NEW DATE FOR PA HEARING AND MARK CMC VACATED; EMAIL ARS; EMAIL OPC	BILLABLE	3/26/2024	0.1	\$175.00	\$17.50	JW
Settlement REVIEW NOTICE OF SETTLEMENT.	BILLABLE	3/25/2024	0.2	\$750.00	\$150.00	ARS
Manage data/files REVISE NOTICE OF SETTLEMENT; FINALIZE NOTICE OF SETTLEMENT WITH POS; SERVE VIA EMAIL; UPLOAD TO NETWORK FILE; UPLOAD TO J&J FOR FILING	BILLABLE	3/25/2024	0.4	\$175.00	\$70.00	JW
Manage data/files EMAIL CORRESPONDENCE WITH ERIC BISHOP AT RUST CONSULTING; DOWNLOAD AND SAVE RUST QUOTE; EMAIL ARS WITH ALL THREE ADMIN QUOTES	BILLABLE	3/20/2024	0.3	\$175.00	\$52.50	JW
Communicate (other outside counsel) EMAIL OPC WITH ADMINISTRATOR QUOTES FOR SETTLEMENT	BILLABLE	3/20/2024	0.2	\$175.00	\$35.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) EMAIL COMMUNICATION WITH KELSEY AT ILYM; EMAIL ARS	BILLABLE	3/20/2024	0.1	\$175.00	\$17.50	JW
Draft/revise REVIEW CALENDAR; REVIEW CASE FILE; PREP DRAFT NOTICE OF SETTLEMENT; EMAIL ARS	BILLABLE	3/14/2024	0.5	\$175.00	\$87.50	JW
Manage data/files DOWNLOAD AND SAVE QUOTES FROM ADMINISTRATORS	BILLABLE	3/7/2024	0.2	\$175.00	\$35.00	JW
Manage data/files EMAIL RUST, ILYM AND CPT FOR ESTIMATES TO ADMINISTER SETTLEMENT	BILLABLE	3/5/2024	0.2	\$175.00	\$35.00	JW
Draft/revise REVIEW SETTLEMENT AGREEMENT IN PREPARATION FOR WORKING ON MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	3/1/2024	0.9	\$150.00	\$135.00	AD
Draft/revise WORK ON POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	2/29/2024	1.4	\$150.00	\$210.00	AD

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Draft/revise WORK ON DECLARATION OF H. REYES IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	2/28/2024	0.9	\$150.00	\$135.00	AD
Draft/revise WORK ON DECLARATION OF A. SALUSKY IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	2/28/2024	4.1	\$150.00	\$615.00	AD
Manage data/files EMAIL OPC RE: HEARING DATE FOR PA MOTION	BILLABLE	2/26/2024	0.1	\$175.00	\$17.50	JW
Manage data/files REVIEW EMAIL FROM OPC; EMAIL ROWENA WALKER TO RESERVE PA HEARING DATE	BILLABLE	2/26/2024	0.1	\$175.00	\$17.50	JW
Manage data/files REVIEW ROWENA WALKER EMAIL; EMAIL OPC RE: JULY DATES NO LONGER AVAILABLE AND PROPOSED AUGUST DATES	BILLABLE	2/26/2024	0.1	\$175.00	\$17.50	JW
Communicate (other outside counsel) EMAIL OPC RE: PA HEARING DATE RESERVED; CALENDAR PA HEARING DATE	BILLABLE	2/26/2024	0.2	\$175.00	\$35.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Settlement MEETING WITH A. DEANTES RE MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	2/26/2024	0.8	\$750.00	\$600.00	ARS
Manage data/files REVIEW EMAILS; PREP DRAFT EMAIL TO OPC RE: RESERVING HEARING DATE FOR PA MOTION	BILLABLE	2/23/2024	0.2	\$175.00	\$35.00	JW
Draft/revise PREP SHELLS FOR PA MOTION (NOTICE AND MPA); PULL SANTA CLARA AND LASC GUIDELINES AND MOU; EMAIL ARS/ANDRES	BILLABLE	2/15/2024	0.7	\$175.00	\$122.50	JW
Communicate (in firm) CONFER WITH J. WILKINSON RE MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	2/15/2024	0.2	\$750.00	\$150.00	ARS
Settlement EMAILS TO AND FROM R. BROWN RE LONG FORM SETTLEMENT AGREEMENT.	BILLABLE	2/1/2024	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (in firm) CONFER WITH J. WILKINSON RE FILING NOTICE OF SETTLEMENT AND OBTAINING DATE FOR MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	2/1/2024	0.2	\$750.00	\$150.00	ARS
Draft/revise UPDATE CASE PLAN.	BILLABLE	2/1/2024	0.1	\$750.00	\$75.00	ARS
Manage data/files REVIEW SANTA CLARA SUPERIOR COURT CIVIL COMPLEX RULES AND DOWNLOAD GUIDELINES FOR SETTLEMENT; EMAIL ROWENA WALKER FOR FIRST AVAILABLE HEARING DATE FOR PA; EMAIL ARS	BILLABLE	2/1/2024	0.6	\$175.00	\$105.00	JW
Communicate (with client) ATTEND MEDIATION WITH CLIENTS VIA ZOOM.	BILLABLE	1/30/2024	6.1	\$750.00	\$4,575.00	ARS
Settlement WORK ON MEMORANDUM OF UNDERSTANDING.	BILLABLE	1/30/2024	1.4	\$750.00	\$1,050.00	ARS
Communicate (with client) CALL WITH H. REYES RE MEDIATION PROCESS.	BILLABLE	1/29/2024	0.5	\$750.00	\$375.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (with client) CALL WITH P. GONZALEZ RE MEDIATION PROCESS.	BILLABLE	1/29/2024	0.5	\$750.00	\$375.00	ARS
Communicate (other external) MULTIPLE EMAILS TO AND FROM OPPOSING COUNSEL RE MEDIATION, LONG FORM SETTLEMNT, OPENING DEMAND.	BILLABLE	1/29/2024	0.4	\$750.00	\$300.00	ARS
Draft/revise WORK ON WITNESS DECLARATION AND CONFER WITH S. PACHECO RE SAME.	BILLABLE	1/29/2024	0.4	\$750.00	\$300.00	ARS
Review/analyze PREPARE FOR MEDIATION.	BILLABLE	1/29/2024	0.8	\$750.00	\$600.00	ARS
Manage data/files DOWNLOAD MEDIATION BRIEF FROM ARS EMAIL; PULL TRANSCRIPTS OF HUMBERTO REYES AND IMELDA TRUJILLO REYES; MARK-UP EXCERPTS PER BRIEF; SEARCH FOR PEDRO GONZALEZ TRANSCRIPT; EMAIL ARS WITH EXCERPTS	BILLABLE	1/23/2024	2.5	\$175.00	\$437.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files SAVE PEDRO GONZALEZ DEPO TRANSCRIPT ON NETWORK; PREP DEPO EXCERPTS FOR PEDRO GONZALEZ; EMAIL ARS	BILLABLE	1/23/2024	2	\$175.00	\$350.00	JW
Manage data/files REVISE MEDIATION BRIEF FOR PROOFREADING; FINALIZE MEDIATION BRIEF WITH EXHIBITS; EMAIL ARS	BILLABLE	1/23/2024	1.5	\$175.00	\$262.50	JW
Manage data/files FORMAT MEDIATION BRIEF; EMAIL TO STEVE ROTTMAN AND ASSISTANT	BILLABLE	1/23/2024	0.2	\$175.00	\$35.00	JW
Communicate (other external) EMAILS TO AND FROM R. BROWN RE CLASS SIZE, WORK WEEKS, CURRENT EMPLOYEES.	BILLABLE	1/23/2024	0.3	\$750.00	\$225.00	ARS
Expert Discovery EMAILS TO AND FROM JT TONEY RE UPDATED INFORMATION FOR DAMAGES ANALYSIS.	BILLABLE	1/23/2024	0.2	\$750.00	\$150.00	ARS
Communicate (with client) EMAIL CLIENTS RE DAMAGE ANALYSIS.	BILLABLE	1/23/2024	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Settlement WORK ON MEDIATION BRIEF.	BILLABLE	1/22/2024	3.5	\$750.00	\$2,625.00	ARS
Communicate (other external) CALL WITH JT TONEY RE DAMAGES ANALYSIS. EMAIL RE SAME.	BILLABLE	1/22/2024	0.3	\$750.00	\$225.00	ARS
Manage data/files DOWNLOAD NOTICE OF RESCHEDULED CMC AND SAVE ON NETWORK; CALENDAR NEW DATE; EMAIL ARS	BILLABLE	1/18/2024	0.2	\$175.00	\$35.00	JW
Communicate (in firm) CONFER WITH J. WILKINSON RE MEDIATION BRIEF.	BILLABLE	1/18/2024	0.2	\$750.00	\$150.00	ARS
Communicate (other external) EMAILS TO AND FROM JT TONEY RE DAMAGES ANALYSIS.	BILLABLE	1/18/2024	0.2	\$750.00	\$150.00	ARS
Draft/revise PREP DRAFT MEDIATION BRIEF; UPLOAD TO NETWORK FILE; EMAIL ARS	BILLABLE	1/18/2024	0.6	\$175.00	\$105.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files EMAIL CORRESPONDENCE WITH ARS; SEARCH NETWORK FILE FOR 30% SAMPLE DOCS TO SEND TO JT; UPLOAD TO DROPBOX; EMAIL JT	BILLABLE	1/9/2024	0.7	\$175.00	\$122.50	JW
Communicate (other external) EMAILS TO AND FROM S.ROTTMAN RE MEDIATION.	BILLABLE	1/9/2024	0.2	\$750.00	\$150.00	ARS
Communicate (other external) EMAIL CORRESPONDENCE WITH REPRESENTATIVE FROM RUST CONSULTING RE BEL AIR WEST NOTICE.	BILLABLE	1/9/2024	0.2	\$750.00	\$150.00	ARS
Communicate (in firm) CONFER WITH J. WILKINSON RE SETTING UP TIME TO SPEAK WITH EXPERT JT TONEY AND FORWARDING SAMPLING TO HIM FOR REVIEW.	BILLABLE	1/9/2024	0.2	\$750.00	\$150.00	ARS
Communicate (other external) CONFER WITH OPPOSING COUNSEL RE MEDIATION.	BILLABLE	1/8/2024	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (in firm) EMAIL CORRESPONDENCE WITH ANGELA AT RUST CONSULTING; EMAIL ARS	BILLABLE	1/5/2024	0.1	\$175.00	\$17.50	JW
Manage data/files REVIEW EMAIL FROM RUST CONSULTING; REVIEW FILES; EMAIL ARS	BILLABLE	1/4/2024	0.2	\$175.00	\$35.00	JW
Manage data/files EMAIL CORRESPONDENCE WITH ARS RE: ADMINISTRATOR FOR NEUTRAL MAILER; ACCEPT OPC CHANGES TO NEUTRAL MAILER; EMAIL RUST CONSULTING	BILLABLE	1/4/2024	0.1	\$175.00	\$17.50	JW
Communicate (other external) EMAIL OPPOSING COUNSEL R. BROWN RE BELAIRE WEST NOTICE.	BILLABLE	1/2/2024	0.2	\$750.00	\$150.00	ARS
Court Mandated Conferences REVIEW NOTICE OF RESCHEDULED CASE MANAGEMENT CONFERENCE.	BILLABLE	12/22/2023	0.3	\$750.00	\$225.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other outside counsel) SEND EMAIL TO OPC TO FOLLOW UP ON NEUTRAL LETTER	BILLABLE	12/22/2023	0.1	\$175.00	\$17.50	
Manage data/files DOWNLOAD NOTICE OF RESCHEDULED CMC; EMAIL ARS/SILVIA; CALENDAR NEW CMC AND DEADLINE TO FILE JOINT CMC STATEMENT; UPLOAD NOTICE TO NETWORK FILE	BILLABLE	12/21/2023	0.2	\$175.00	\$35.00	
Manage data/files DOWNLOAD CONFORMED COPY OF JOINT CMC STATEMENT AND SAVE ON NETWORK; PULL REMOTE HEARING LINK FROM COURT WEBSITE AND ADD TO PANTHER CALENDAR FOR CMC	BILLABLE	12/18/2023	0.3	\$175.00	\$52.50	
Communicate (other outside counsel) EMAIL OPC RE: NEUTRAL MAILER FINAL VERSION	BILLABLE	12/13/2023	0.2	\$175.00	\$35.00	

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files FINALIZE JOINT CMC STATEMENT WITH POS; SERVE VIA EMAIL; UPLOAD TO J&J FOR FILING; CALENDAR DEADLINE FOR DEF. TO PROVIDE CLASS LIST TO RUST; REVIEW EMAILS FOR FINAL NEUTRAL MAILER; EMAIL ARS	BILLABLE	12/12/2023	0.7	\$175.00	\$122.50	JW
Court Mandated Conferences WORK ON JOINT CMC STATEMENT. CONFER WITH J. WILKINSON RE SAME.	BILLABLE	12/11/2023	0.2	\$750.00	\$150.00	ARS
Draft/revise REVISE JOINT CMC STATEMENT PER ARS EMAIL; EMAIL ARS	BILLABLE	12/11/2023	0.2	\$175.00	\$35.00	JW
Manage data/files REVISE JOINT CMC STATEMENT; EMAIL OPC	BILLABLE	12/11/2023	0.2	\$175.00	\$35.00	JW
Communicate (other external) EMAILS TO AND FROM R. MASON RE PLAINTIFF'S DISCOVERY RESPONSES.	BILLABLE	12/6/2023	0.2	\$750.00	\$150.00	ARS
Written Discovery WORK ON RESPONSES TO SPECIAL INTERROGATORIES, SET SIX.	BILLABLE	12/5/2023	2.3	\$750.00	\$1,725.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files DOWNLOAD AND SAVE DEF. RESPONSE TO RFPD #2; CALENDAR MOTION TO COMPEL DEADLINE	BILLABLE	11/29/2023	0.5	\$175.00	\$87.50	JW
Manage data/files CALENDAR NEW DATE FOR DEF. RESPONSES TO SPROGS (CLASS DATA); SEARCH EMAILS FOR AGREEMENT TO ADMINISTRATOR; EMAIL ARS; CHECK COURT DOCKET TO SEE IF CMC STILL ON CALENDAR;	BILLABLE	11/29/2023	1.4	\$175.00	\$245.00	JW
Manage data/files REVIEW EMAIL CORRESPONDENCE BETWEEN OPC AND ARS; CALENDAR DEADLINE FOR DEF TO PRODUCE FURTHER RESPONSES TO DISCOVERY	BILLABLE	11/28/2023	0.2	\$175.00	\$35.00	JW
Written Discovery REVIEW DISCOVERY RESPONSES FROM DEFENDANT DINSMORE.	BILLABLE	11/21/2023	0.3	\$750.00	\$225.00	ARS
Communicate (other external) EMAIL R. BROWN RE MEET AND CONFER RE DEFICIENT DISCOVERY RESPONSES.	BILLABLE	11/21/2023	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) REVIEW EMAIL FROM R. MASON RE SPECIAL INTERROGATORIES, SET SIX.	BILLABLE	11/13/2023	0.2	\$750.00	\$150.00	ARS
Communicate (in firm) EMAIL CORRESPONDENCE WITH ARS RE: DEFENDANT'S DISCOVERY	BILLABLE	11/13/2023	0.2	\$175.00	\$35.00	JW
Written Discovery DOWNLOAD DEF. SPROGS #6 AND DECLARATION; UPLOAD TO NETWORK FILE; PREP SHELL FOR RESPONSES TO SPROGS #6; EMAIL ARS; UPLOAD DRAFT TO NETWORK FILE	BILLABLE	11/13/2023	1.6	\$175.00	\$280.00	JW
Draft/revise PREP DRAFT RFPD #2 PER ARS EMAIL; EMAIL ARS	BILLABLE	10/18/2023	0.3	\$175.00	\$52.50	JW
Manage data/files FINALIZE RFPD #2 WITH POS; SERVE VIA EMAIL TO OPC; UPLOAD TO NETWORK; CALENDAR DEADLINE FOR DEF. RESPONSES	BILLABLE	10/18/2023	0.3	\$175.00	\$52.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Court Mandated Conferences APPEAR FOR COURT CALL FOR INFORMAL DISCOVERY CONFERENCE RE BELAIRE WEST.	BILLABLE	10/17/2023	0.5	\$750.00	\$375.00	ARS
Written Discovery PREPARE REQUEST FOR PRODUCTION, SET TWO.	BILLABLE	10/17/2023	0.4	\$750.00	\$300.00	ARS
Manage data/files DOWNLOAD AND SAVE NOTICE OF CONTINUED CMC; CALENDAR NEW DATE AND DEADLINE TO FILE CMC STATEMENT	BILLABLE	10/16/2023	0.2	\$175.00	\$35.00	JW
Draft/revise PREP DRAFT BRIEF FOR INFORMAL DISCOVERY CONFERENCE; EMAIL ARS	BILLABLE	10/13/2023	1	\$175.00	\$175.00	JW
Draft/revise WORK ON BRIEF RE BELAIRE WEST NOTICE.	BILLABLE	10/13/2023	0.6	\$750.00	\$450.00	ARS
Manage data/files REVIEW ARS REVISED BRIEF FOR INFORMAL DISCOVERY CONFERENCE; EMAIL ARS RE: BRIEF CAN ONLY BE 6 PAGES	BILLABLE	10/13/2023	0.3	\$175.00	\$52.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files REVISE BRIEF RE: INFORMAL DISCOVERY TO CORRECT PAGE NUMBERING; FINALIZE WITH POS; SERVE VIA EMAIL; UPLOAD TO J&J FOR E-FILING	BILLABLE	10/13/2023	0.3	\$175.00	\$52.50	JW
Manage data/files SAVE OPC REDLINE JOINT CMC STATEMENT; ACCEPT CHANGES AND FINALIZE JOINT CMC STATEMENT; EMAIL OPC	BILLABLE	10/4/2023	0.5	\$175.00	\$87.50	JW
Manage data/files DOWNLOAD JOINT CMC STATEMENT WITH OPC SIGNATURE; FINALIZE WITH POS; SERVE VIA EMAIL; UPLOAD TO J&J FOR FILING	BILLABLE	10/4/2023	0.4	\$175.00	\$70.00	JW
Draft/revise PREP DRAFT JOINT CMC STATEMENT; EMAIL ARS/SILVIA	BILLABLE	10/3/2023	0.3	\$175.00	\$52.50	JW
Manage data/files DOWNLOAD ARS REVISED JOINT CMC STATEMENT; EMAIL TO OPC FOR REVIEW AND SIGNATURE	BILLABLE	10/3/2023	0.2	\$175.00	\$35.00	JW
Manage data/files REVIEW OPC EMAIL AND REVISED JOINT CMC STATEMENT; EMAIL ARS	BILLABLE	10/3/2023	0.1	\$175.00	\$17.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files DOWNLOAD AND SAVE COURT'S ORDER RESCHEDULING INFORMAL DISCOVERY CONFERENCE; CALENDAR DATES; EMAIL ARS/SILVIA	BILLABLE	9/27/2023	0.2	\$175.00	\$35.00	
Manage data/files CHECK DISCOVERY PROPOUNDED TO SEE IF WE ASKED FOR CLASS NAMES/ADDRESSES; EMAIL ARS	BILLABLE	9/26/2023	0.1	\$175.00	\$17.50	
Communicate (other external) REVIEW EMAILS; EMAIL ROWENA WALKER WITH AVAILABILITY FOR INFORMAL DISCOVERY CONFERENCE	BILLABLE	8/23/2023	0.2	\$175.00	\$35.00	
Manage data/files DOWNLOAD COURT'S ORDER RE: INFORMAL DISCOVERY CONFERENCE; PULL TEAMS LINK FROM COURT WEBSITE AND ADD TO PANTHER; CAL DEADLINE TO FILE BRIEF FOR INFORMAL DISCOVERY CONFERENCE.	BILLABLE	8/23/2023	0.5	\$175.00	\$87.50	

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) READ AND REPLY TO ARS EMAIL RE SCHEDULING INFORMAL DISCOVERY CONFERENCE; EMAIL ROWENA WALKER RE: AVAILABILITY AFTER 9/26/23	BILLABLE	8/21/2023	0.2	\$175.00	\$35.00	JW
Communicate (other external) SEARCH COURT WEBSITE; EMAIL ROWENA WALKER FOR JUDGE'S AVAILABILITY FOR INFORMAL DISCOVERY CONFERENCE; FORWARD ROWENA EMAIL TO ARS	BILLABLE	8/16/2023	0.3	\$175.00	\$52.50	JW
Manage data/files EMAIL CORRESPONDENCE WITH ARS RE: JUDGE AVAILABILITY	BILLABLE	8/16/2023	0.1	\$175.00	\$17.50	JW
Depositions REVIEW DEPOSITION TRANSCRIPT OF P. GONZALEZ.	BILLABLE	8/15/2023	0.7	\$750.00	\$525.00	ARS
Communicate (other external) EMAIL R. BROWN RE INFORMAL DISCOVERY CONFERENCE RE BELAIRE WEST.	BILLABLE	8/15/2023	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) EMAIL R. BROWN RE BELAIRE WEST NOTICE.	BILLABLE	8/14/2023	0.2	\$750.00	\$150.00	ARS
Communicate (with client) CALL TO HUMBERTO REYES MONREAL RE STATUS UPDATE WITH S. PACHECO TRANSLATING.	BILLABLE	8/10/2023	0.2	\$750.00	\$150.00	ARS
Draft/revise UPDATE CASE PLAN.	BILLABLE	8/10/2023	0.2	\$750.00	\$150.00	ARS
Communicate (with client) CALL WITH P. GONZALEZ RE STATUS OF MATTER.	BILLABLE	8/10/2023	0.3	\$750.00	\$225.00	ARS
Communicate (other external) SEND MEET AND CONFER WITH R. BROWN RE BELAIRE WEST NOTICE.	BILLABLE	8/9/2023	0.4	\$750.00	\$300.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files DOWNLOAD AND SAVE COURT'S NOTICE OF FURTHER CMC; DOUBLE CHECK CMC ON CALENDAR; REVISE DEADLINE FOR CMC STATEMENT; UPLOAD NOTICE TO NETWORK; EMAIL ARS	BILLABLE	7/28/2023	0.3	\$175.00	\$52.50	JW
Manage data/files EMAIL CORRESPONDENCE WITH ARS; EMAIL CLAIMS ADMIN RE: PARTIES HAVE REACHED IMPASSE RE: NEUTRAL MAILER	BILLABLE	7/28/2023	0.2	\$175.00	\$35.00	JW
Court Mandated Conferences REVIEW NOTICE OF FURTHER CMC. CONFER WITH J. WILKINSON RE SAME.	BILLABLE	7/28/2023	0.2	\$750.00	\$150.00	ARS
Manage data/files REVIEW FILES; REVIEW FIRST AMENDED COMPLAINT; EMAIL ARS	BILLABLE	7/27/2023	0.3	\$175.00	\$52.50	JW
Manage data/files FINALIZE NOTICE OF RULING AT CMC WITH POS; SERVE VIA EMAIL; UPLOAD TO J&J	BILLABLE	7/26/2023	0.5	\$175.00	\$87.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Court Mandated Conferences CONFER WITH J. WILKINSON RE NOTICE OF RULING OF CMC.	BILLABLE	7/25/2023	0.1	\$750.00	\$75.00	ARS
Draft/revise REVIEW JANELLE'S EMAIL FROM APPEARANCE AT CMC; PREP NOTICE OF RULING AT CMC; DOWNLOAD AND SAVE CONFORMED COPY OF FAC ON NETWORK; EMAIL ARS DRAFT NOTICE OF RULING AT CMC	BILLABLE	7/24/2023	0.5	\$175.00	\$87.50	JW
Court Mandated Conferences REVIEW NOTICE OF RULING AT CMC.	BILLABLE	7/24/2023	0.2	\$750.00	\$150.00	ARS
Communicate (other external) EMAIL R. BROWN RE BELAIRE-WEST AND ADDING MR. GONZALEZ AS A PLAINTIFF.	BILLABLE	7/24/2023	0.2	\$750.00	\$150.00	ARS
Draft/revise UPDATE CASE PLAN.	BILLABLE	7/23/2023	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Court Mandated Conferences CONFER WITH J. CARNEY RE COVERING CASE MANAGEMENT CONFERENCE.	BILLABLE	7/20/2023	0.3	\$750.00	\$225.00	ARS
Court Mandated Conferences CONFER WITH OPPOSING COUNSEL RE CMC STATEMENT.	BILLABLE	7/17/2023	0.2	\$750.00	\$150.00	ARS
Manage data/files DOWNLOAD OPC REDLINE JOINT CMC STATEMENT; ACCEPT REDLINE CHANGES; REVISE FOR FORMATTING; FINALIZE IN PDF WITH POS; SERVE VIA EMAIL; UPLOAD TO J&J FOR FILING; UPLOAD TO NETWORK FILE; MARK COMPLETED IN PANTHER	BILLABLE	7/17/2023	0.5	\$175.00	\$87.50	JW
Draft/revise PREP DRAFT JOINT CMC STATEMENT; EMAIL ARS	BILLABLE	7/14/2023	0.3	\$175.00	\$52.50	JW
Court Mandated Conferences WORK ON CMC STATEMENT.	BILLABLE	7/14/2023	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Written Discovery BRIEF REVIEW OF DEFENDANT DEINSMORE'S SPROGS, SET SIX PROPOUNDED ON PLAINTIFF REYES.	BILLABLE	7/11/2023	0.3	\$750.00	\$225.00	ARS
Manage data/files SEARCH EMAILS FOR FINAL VERSION OF NEUTRAL MAILER; EMAIL ERIC AT RUST; EMAIL ARS	BILLABLE	7/7/2023	0.3	\$175.00	\$52.50	JW
Communicate (other external) MULTIPLE EMAILS TO AND FROM ERIC AT RUST CONSULTING RE BELAIRE NOTICE.	BILLABLE	7/7/2023	0.3	\$850.00	\$255.00	ARS
Communicate (in firm) EMAIL CORRESPONDENCE WITH ARS RE: NEUTRAL MAILER	BILLABLE	7/7/2023	0.1	\$175.00	\$17.50	JW
Communicate (other external) EMAIL OPC AND RUST RE: ENGAGING FOR NEUTRAL MAILER	BILLABLE	7/7/2023	0.2	\$175.00	\$35.00	JW
Depositions ATTEND DEPOSITION OF P. GONZALEZ.	BILLABLE	7/6/2023	5.6	\$750.00	\$4,200.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) EMAILS TO AND FROM OPPOSING COUNSEL RE CLAIMS ADMINISTRATOR FOR NOTICE.	BILLABLE	6/27/2023	0.2	\$750.00	\$150.00	ARS
Review/analyze REVIEW REDLINES TO BELAIRE WEST NOTICE. EMAIL R. BROWN RE SAME.	BILLABLE	6/26/2023	0.4	\$750.00	\$300.00	ARS
Manage data/files REVIEW EMAILS WITH OPC; EMAIL RACHAEL BROWN WITH RUST ESTIMATE INCLUDING POSTCARD AND PROPOSED MAILER	BILLABLE	6/23/2023	0.6	\$175.00	\$105.00	JW
Pleading REVIEW ANSWER TO FIRST AMENDED COMPLAINT.	BILLABLE	5/16/2023	0.2	\$750.00	\$150.00	ARS
Manage data/files REVIEW PREVIOUS EMAIL TO OPC WITH ESTIMATES FOR ADMINISTRATORS OF BELAIRE- WEST MAILER; SEND FOLLOW UP EMAIL TO OPC	BILLABLE	5/15/2023	0.3	\$175.00	\$52.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files REVIEW THIRD AMENDED NOTICE OF DEPO PEDRO GONZALES AND CONFIRM ON CALENDAR; CAL DEADLINE TO OBJECT TO DEPO NOTICE	BILLABLE	5/9/2023	0.2	\$175.00	\$35.00	JW
Manage data/files DOWNLOAD AND SAVE ESTIMATES FROM NEUTRAL ADMINISTRATORS; EMAIL OPC WITH ESTIMATES	BILLABLE	5/4/2023	0.3	\$175.00	\$52.50	JW
Manage data/files REVIEW FILES; EMAIL ADMINISTRATORS FOR ESTIMATES FOR NEUTRAL MAILER	BILLABLE	5/2/2023	0.9	\$175.00	\$157.50	JW
Draft/revise REVIEW FILE AND UPDATE CASE PLAN.	BILLABLE	4/30/2023	0.2	\$750.00	\$150.00	ARS
Communicate (in firm) CONFER WITH J. WILKINSON RE BIDS FOR BELAIRE WEST NOTICE.	BILLABLE	4/30/2023	0.2	\$750.00	\$150.00	ARS
Communicate (in firm) CONFER WITH S. PACHECO RE SCHEDULING DEPOSITION PREP FOR MR. GONZALEZ.	BILLABLE	4/30/2023	0.1	\$750.00	\$75.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Draft/revise UPDATE CASE PLAN.	BILLABLE	4/17/2023	0.3	\$750.00	\$225.00	ARS
Communicate (in firm) CONFER WITH J. WILKINSON RE CLASS SIZE, BELAIRE WEST BIDS.	BILLABLE	4/17/2023	0.2	\$750.00	\$150.00	ARS
Manage data/files DOWNLOAD ORDER ALLOWING PLAINTIFF TO FILE FAC; DOWNLOAD COURT'S MINUTE ORDER CONTINUING CMC; UPLOAD TO NETWORK	BILLABLE	4/14/2023	0.4	\$175.00	\$70.00	JW
Manage data/files EMAIL ARS RE MINUTE ORDER; FINALIZE FIRST AMENDED COMPLAINT WITH POS; SERVE OPC VIA EMAIL; UPLOAD TO NETWORK; UPLOAD TO J&J FOR E-FILING	BILLABLE	4/14/2023	0.6	\$175.00	\$105.00	JW
Communicate (in firm) CONFER WITH J. WILKINSON RE FILING FIRST AMENDED COMPLAINT, BELAIRE NOTICE.	BILLABLE	4/14/2023	0.3	\$750.00	\$225.00	ARS
Court Mandated Conferences REVIEW NOTICE RE CONTINUED CMC.	BILLABLE	4/14/2023	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files FINALIZE STIP AND PROPOSED ORDER TO ALLOW PLF TO FILE FAC WITH EXHIBIT AND POS; CORRESP. WITH ARS; FINALIZE JOINT CMC STATEMENT WITH POS; SERVE OPC VIA EMAIL; UPLOAD TO NETWORK; UPLOAD JOINT CMC STATEMENT AND STIP TO FILE FAC TO J&J PORTAL FOR FILING	BILLABLE	4/13/2023	0.8	\$175.00	\$140.00	JW
Communicate (other external) EMAILS TO AND FROM R. BROWN RE FAC, BELAIRE NOTICE, STIPULATION AND ORDER.	BILLABLE	4/13/2023	0	\$750.00	\$0.00	ARS
Manage data/files REVIEW ARS EMAIL; REVISE JOINT CMC STATEMENT PER ARS EMAIL; EMAIL REVISED CMC STATEMENT TO ARS FOR REVIEW	BILLABLE	4/12/2023	0.4	\$175.00	\$70.00	JW
Manage data/files REVISE CMC STATEMENT PER ARS EMAIL; EMAIL OPC WITH DRAFT JOINT CMC STATEMENT	BILLABLE	4/12/2023	0.2	\$175.00	\$35.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files EMAIL ARS TO FOLLOW UP ON DRAFT NEUTRAL MAILER AND DRAFT CMC STATEMENT; LOOK UP REMOTE APPEARANCE INFO AND ADD TO PANTHER FOR 4/20/2023 CMC	BILLABLE	4/11/2023	0.7	\$175.00	\$122.50	JW
Manage data/files REVIEW FILES; PREP DRAFT EMAIL TO OPC; EMAIL ARS; SEND ANOTHER FOLLOW UP EMAIL RE JOINT CMC STATEMENT	BILLABLE	4/11/2023	1	\$175.00	\$175.00	JW
Manage data/files REVIEW ARS EMAIL; EMAIL OPC TO FOLLOW UP ON STIP/FAC, NEUTRAL MAILER AND REQUEST TO STIP TO CONTINUE CERT FILING DEADLINE	BILLABLE	4/11/2023	0.2	\$175.00	\$35.00	JW
Draft/revise PREP DRAFT NEUTRAL MAILER; UPLOAD TO NETWORK; EMAIL ARS	BILLABLE	4/5/2023	0.5	\$175.00	\$87.50	JW
Court Mandated Conferences CONFER WITH J. WILKINSON RE BELAIRE NOTICE AND UPCOMING CASE MANANAGEMENT CONFERENCE.	BILLABLE	3/28/2023	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Draft/revise REVIEW FILES; PREP DRAFT JOINT CMC STATEMENT; EMAIL ARS	BILLABLE	3/27/2023	0.3	\$175.00	\$52.50	JW
Communicate (other external) MULTIPLE EMAILS TO AND FROM OPPOSING COUNSEL RE THEIR OFFICE NEEDS TO RESCHEDULE DEPOSITION.	BILLABLE	3/16/2023	0.2	\$750.00	\$150.00	ARS
Manage data/files PREP DRAFT BELAIRE-WEST NEUTRAL LETTER; EMAIL SILVIA/ARS	BILLABLE	3/16/2023	0.4	\$175.00	\$70.00	JW
Communicate (with client) TELECON WITH P. GONZALEZ RE DEPO PREP.	BILLABLE	3/13/2023	1.7	\$750.00	\$1,275.00	ARS
Manage data/files SEARCH FILES FOR MISSING EXHIBITS TO DEPO TRANSCRIPT; EMAIL ARS	BILLABLE	3/8/2023	0.3	\$175.00	\$52.50	JW
Communicate (other external) CONFER WITH JT. TONEY RE DAMAGES ANALYSIS.	BILLABLE	3/3/2023	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files REVIEW EMAILS RE MISSING EXHIBITS FOR COURT REPORTER; SEARCH NETWORK FILES; EMAIL ARS RE MISSING EXHIBITS	BILLABLE	3/2/2023	0.1	\$175.00	\$17.50	JW
Draft/revise REVIEW PROPOSED FAC; EMAIL ARS; REVIEW ARS EMAIL AND REVISE FAC; EMAIL ARS	BILLABLE	2/28/2023	0.6	\$175.00	\$105.00	JW
Pleading WORK ON FIRST AMENDED COMPLAINT.	BILLABLE	2/28/2023	0.6	\$750.00	\$450.00	ARS
Manage data/files REVISE DRAFT STIPULATION AND PROPOSED ORDER TO ALLOW PLAINTIFF TO FILE FAC; EMAIL ARS	BILLABLE	2/28/2023	0.2	\$175.00	\$35.00	JW
Communicate (other outside counsel) EMAIL OPC WITH PROPOSED STIPULATION AND PROPOSED ORDER TO ALLOW PLAINTIFF TO FILE FAC AND PROPOSED FAC	BILLABLE	2/28/2023	0.2	\$175.00	\$35.00	JW
Communicate (with client) DEPOSITION PREP WITH P. GONZALEZ.	BILLABLE	2/27/2023	2	\$750.00	\$1,500.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Written Discovery WORK ON FINALIZING SPECIAL INTERROGATORIES SET FIVE, PROPOUNDED TO H. REYES MONREAL.	BILLABLE	2/27/2023	0.6	\$750.00	\$450.00	ARS
Manage data/files FINALIZE PLF'S RESPONSES TO SPROGS #5 WITH VERIFICATIONS; SERVE RESPONSES TO SPROGS #5 VIA EMAIL; CALENDAR DEADLINE FOR DEF TO FILE MOTION TO COMPEL FURTHER RESPONSES	BILLABLE	2/27/2023	0.3	\$175.00	\$52.50	JW
Draft/revise PREP DRAFT FIRST AMENDED COMPLAINT TO ADD PEDRO GONZALES; PREP DRAFT STIP & PROPOSED ORDER TO ALLOW PLAINTIFF TO FILE FAC; EMAIL ARS; UPLOAD TO NETWORK	BILLABLE	2/27/2023	0.7	\$175.00	\$122.50	JW
Draft/revise REVISE PROPOSED FAC PER ARS EMAIL	BILLABLE	2/27/2023	0.2	\$175.00	\$35.00	JW
Pleading WORK ON FIRST AMENDED COMPLAINT.	BILLABLE	2/27/2023	0.5	\$750.00	\$375.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files PULL DEPO EXHIBITS FOR COURT REPORTER; EMAIL ARS RE NOT FINDING EXHIBITS 5 & 6; EMAIL COURT REPORTER WITH PARTIAL EXHIBITS	BILLABLE	2/21/2023	0.8	\$175.00	\$140.00	JW
Manage data/files REVIEW EMAILS; REVISE STIP RE: CLASS CERT BRIEFING SCHEDULE TO ADD HEARING DATE; EMAIL OPC	BILLABLE	2/7/2023	0.3	\$175.00	\$52.50	JW
Depositions TAKE DEPOSITION OF PERSON MOST QUALIFIED.	BILLABLE	2/3/2023	5.8	\$750.00	\$4,350.00	ARS
Depositions EMAIL J. WILKINSON RE PREPARING EXHIBITS TO SEND TO COURT REPORTER RE DEPOSITION OF PERSON MOST QUALIFIED.	BILLABLE	2/3/2023	0.2	\$750.00	\$150.00	ARS
Manage data/files REVIEW FILES; SEND FOLLOW-UP EMAIL TO ARS RE: STIP FOR CLASS CERT BRIEFING SCHEDULE	BILLABLE	2/2/2023	0.1	\$175.00	\$17.50	JW
Depositions PREPARE FOR DEPOSITION OF PERSON MOST QUALIFIED.	BILLABLE	2/2/2023	2.5	\$750.00	\$1,875.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
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[Manage data/files](#)

EMAIL CORRESPONDENCE WITH ARS; FINALIZE NOTICE OF DEPOSITION OF GABRIELA GARCIA WITH PROOF OF SERVICE; CORRESPONDENCE WITH ALICIA AT INTREPID DEPO; SERVE OPC VIA EMAIL WITH NOTICE OF DEPO OF PMQ/GABRIELA GARCIA; PREP DRAFT DOE AMENDMENT FOR PEDRO GONZALES; EMAIL ARS

BILLABLE

2/1/2023

0.7

\$175.00

\$122.50

JW

[Draft/revise](#)

REVIEW EMAILS FOR OPC EMAIL SPELLING OUT PMQ CATEGORIES FOR GABRIELA GARCIA; UPDATE NOTICE OF DEPOSITION; EMAIL ARS

BILLABLE

1/31/2023

0.5

\$175.00

\$87.50

JW

[Communicate \(in firm\)](#)

EMAIL CORRESPONDENCE WITH SOPHIA; RE-SEND DRAFT NOTICE OF DEPO GABRIELA GARCIA

BILLABLE

1/31/2023

0.2

\$175.00

\$35.00

JW

[Depositions](#)

WORK ON AMENDED PMQ DEPOSITION NOTICE.

BILLABLE

1/31/2023

0.4

\$750.00

\$300.00

ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) MULTIPLE EMAILS TO AND FROM OPPOSING COUNSEL RE DEPOSITION OF PMQ.	BILLABLE	1/31/2023	0.3	\$750.00	\$225.00	ARS
Draft/revise UPDATE CASE PLAN.	BILLABLE	1/31/2023	0.2	\$750.00	\$150.00	ARS
Manage data/files MARK MOTION TO COMPEL HEARING OFF CALENDAR	BILLABLE	1/27/2023	0.1	\$175.00	\$17.50	JW
Communicate (in firm) CALL WITH JT TONEY RE DOCUMENT PRODUCTION.	BILLABLE	1/26/2023	0.3	\$750.00	\$225.00	ARS
Written Discovery EMAILS TO AND FROM R. BROWN RE TAKING MOTION TO COMPEL OFF CALENDAR.	BILLABLE	1/26/2023	0.2	\$750.00	\$150.00	ARS
Communicate (other external) CALL WITH JT TONEY RE DOCUMENTS PRODUCED.	BILLABLE	1/25/2023	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) EMAIL R. BROWN RE DOCUMENTS RPRODUCED, SIZE OF CLASS.	BILLABLE	1/25/2023	0.2	\$750.00	\$150.00	ARS
Communicate (other external) CALL WITH P. GONZALES WITH S. PACHECO TRANSLATING.	BILLABLE	1/23/2023	1.5	\$750.00	\$1,125.00	ARS
Review/analyze STRATEGY REVIEW RE NAMING P. GONZALES AS A SECOND PLAINTIFF.	BILLABLE	1/23/2023	0.2	\$850.00	\$170.00	ARS
Communicate (other external) EMAIL OPPOSING COUNSEL RE DEPOSITION SCHEDULE FOR P. GONZALES.	BILLABLE	1/23/2023	0.2	\$750.00	\$150.00	ARS
Manage data/files DOWNLOAD AND SAVE MINUTE ORDER SETTING FURTHER CMC; CALENDAR CMC AND DEADLINE TO FILE CMC STATEMENT; EMAIL ARS	BILLABLE	1/19/2023	0.3	\$175.00	\$52.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files TELEPHONE CORRESPONDENCE WITH SILVIA; SEARCH EMAILS FOR PEDRO GONZALES CONTACT INFO; EMAIL SILVIA	BILLABLE	1/17/2023	0.2	\$175.00	\$35.00	JW
Manage data/files REVIEW EMAILS; SEARCH FILES FOR DEFENDANT'S DECLARATIONS; EMAIL ARS	BILLABLE	1/16/2023	0.7	\$175.00	\$122.50	JW
Manage data/files EMAIL CORRESPONDENCE WITH ROWENA WALKER RE: CLASS CERTIFICATION HEARING DATE; PREP DRAFT STIPULATION AND PROPOSED ORDER RE: CLASS CERT BRIEFING SCHEDULE; PREP DRAFT SHELLS FOR RESPONSES TO SPROGS #5; UPLOAD TO NETWORK; EMAIL ARS	BILLABLE	1/16/2023	2	\$175.00	\$350.00	JW
Manage data/files REVIEW EMAILS; REVIEW FILES; DOWNLOAD AND SAVE DEF SPROGS #5; DECLARATION; CALENDAR RESPONSES;	BILLABLE	1/13/2023	0.5	\$175.00	\$87.50	JW
Manage data/files REVIEW ARS EMAIL WITH RESULTS FROM HEARING; CALENDAR DEADLINES	BILLABLE	1/13/2023	0.4	\$175.00	\$70.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files REVIEW ARS EMAIL WITH RESULTS FROM HEARING; CALENDAR DEADLINES	BILLABLE	1/13/2023	0.4	\$175.00	\$70.00	JW
Court Mandated Conferences APPEAR FOR STATUS CONFERENCE.	BILLABLE	1/12/2023	0.7	\$750.00	\$525.00	ARS
Communicate (in firm) CONFER WITH J. WILKINSON RE FOLLOW UP ACTION ITEMS AND CALENDARING.	BILLABLE	1/12/2023	0.3	\$750.00	\$225.00	ARS
Court Mandated Conferences PREPARE FOR STATUS CONFERENCE.	BILLABLE	1/11/2023	0.3	\$750.00	\$225.00	ARS
Manage data/files REVIEW COURT DOCKET TO CONFIRM CMC ON CALENDAR; PULL REMOTE HEARING LINK AND ADD TO PANTHER; PREP DRAFT JOINT CMC STATEMENT; REVIEW MINUTE ORDER; EMAIL ARS	BILLABLE	1/3/2023	0.9	\$175.00	\$157.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files DOWNLOAD AND SAVE ORDER TO CONTINUE HEARING ON MOTION TO COMPEL; EMAIL ARS; CALENDAR NEW HEARING DATE; LOOK UP REMOTE HEARING LINK ON COURT WEBSITE; CALENDAR REMINDER TO GET NEW REMOTE HEARING LINK ON 2/01/23	BILLABLE	12/23/2022	0.5	\$175.00	\$87.50	JW
Manage data/files DOWNLOAD REDLINE STIP TO CONTINUE HEARING ON MX COMPEL AND ACCEPT CHANGES; FINALIZE STIP AND PROPOSED ORDER WITH POS; U UPLOADD TO NETWORK; SERVE OPC VIA EMAIL; UPLOAD TO J&J PORTAL FOR FILING	BILLABLE	12/21/2022	1	\$175.00	\$175.00	JW
Draft/revise REVIEW PANTHER AND NETWORK FILE FOR PROCEDURAL HISTORY RE: MOTION TO COMPEL PRODUCTION OF DOCUMENTS; PREP DRAFT STIP TO CONTINUE HEARING ON MOTION TO COMPEL PRODUCTION OF DOCUMENTS; EMAIL ARS; UPLOAD TO NETWORK	BILLABLE	12/16/2022	0.9	\$175.00	\$157.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other outside counsel) EMAIL OPC STIP AND PROPOSED ORDER TO CONTINUE HEARING ON PLF MOTION TO COMPEL DEFENDANT TO PRODUCE DOCUMENTS	BILLABLE	12/16/2022	0.1	\$175.00	\$17.50	JW
Discovery Motions REVIEW STIPULATION TO CONTINUE MOTION TO COMPEL HEARING.	BILLABLE	12/16/2022	0.2	\$750.00	\$150.00	ARS
Communicate (other external) EMAILS TO AND FROM R. BROWN RE DEPOSITION SCHEDULE, MOTION TO COMPEL, STIPULATION.	BILLABLE	12/16/2022	0.2	\$750.00	\$150.00	ARS
Manage data/files FINALIZE PLAINTIFF'S RESPONSES TO RFPD #2 WITH VERIFICATION AND POS; UPLOAD TO NETWORK; SERVE OPC VIA EMAIL; CALENDAR DEF. DEADLINE TO FILE MOTION TO COMPEL FURTHER RESPONSES	BILLABLE	12/13/2022	0.5	\$175.00	\$87.50	JW
Communicate (other external) EMAILS TO AND FROM K. WILSON RE DEPOSITIONS.	BILLABLE	12/12/2022	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Written Discovery WORK ON RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET TWO.	BILLABLE	12/12/2022	0.6	\$750.00	\$450.00	ARS
Manage data/files DOWNLOAD RESPONSES TO RFPD #2; PREP VERIFICATION FORM FOR CLIENT SIGNATURE; FINALIZE RESPONSES AND VERIFICATION FORM IN PDF; UPLOAD TO DOCUSIGN FOR CLIENT SIGNATURE	BILLABLE	12/12/2022	0.3	\$175.00	\$52.50	JW
Manage data/files DOWNLOAD AND SAVE NOTICE OF DEPOSITION OF PEDRO GONZALES; CALENDAR DEPOSITION; CALENDAR DEADLINE TO OBJECT	BILLABLE	12/9/2022	0.4	\$175.00	\$70.00	JW
Manage data/files PREP DRAFT SHELL RESPONSES TO RFPD #2; UPLOAD TO NETWORK; EMAIL ARS	BILLABLE	12/9/2022	0.5	\$175.00	\$87.50	JW
Manage data/files PREP DRAFT OBJECTION TO NOTICE OF DEPO OF PEDRO GONZALES; EMAIL ARS; FINALIZE ARS REVISED VERSION OF OBJECTION WITH POS; SERVE OPC VIA EMAIL	BILLABLE	12/9/2022	1.1	\$175.00	\$192.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
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[Manage data/files](#)

ATTEMPT TO SCHEDULE COURT CALL; CHECK COURT WEBSITE FOR REMOTE HEARING LINK; NEW LINKS ARE GENERATED EACH MONTH; PULL LINK AFTER 1/01/2023 FOR 1/12/2023 HEARING

BILLABLE

12/9/2022

0.5

\$175.00

\$87.50

JW

[Manage data/files](#)

DOWNLOAD TWO SETS OF ADDITIONAL DOCUMENTS PRODUCED BY DEFENDANT AND SAVE ON NETWORK; UPLOAD TO DROPBOX; EMAIL JT

BILLABLE

12/8/2022

1.8

\$175.00

\$315.00

JW

[Manage data/files](#)

DOWNLOAD DOCS PRODUCED BY DEFENDANT; UPLOAD TO NETWORK; UPLOAD TO DROPBOX; EMAIL JT

BILLABLE

12/8/2022

0.5

\$175.00

\$87.50

JW

[Depositions](#)

REVIEW NOTICE OF DEPOSITION OF P. GONZALES.

BILLABLE

12/8/2022

0.2

\$750.00

\$150.00

ARS

[Communicate \(in firm\)](#)

EMAIL K. WILSON RE UNAVAILABILITY FOR 1/11 DEPOSITION THAT WAS UNILATERALLY NOTICED.

BILLABLE

12/8/2022

0.2

\$750.00

\$150.00

ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files DOWNLOAD ADDITIONAL DOCUMENTS PRODUCED BY DEFENDANT AND SAVE ON NETWORK; UPLOAD TO DROPBOX; EMAIL JT	BILLABLE	12/7/2022	1.2	\$175.00	\$210.00	JW
Communicate (other external) EMAILS TO AND FROM JT TONEY RE DAMAGES CALCULATIONS.	BILLABLE	12/7/2022	0.2	\$750.00	\$150.00	ARS
Manage data/files EMAIL OPC REQUESTING EXTENSION ON RESPONSES TO RFPD #2	BILLABLE	12/6/2022	0.3	\$175.00	\$52.50	JW
Manage data/files DOWNLOAD DOCUMENTS PRODUCED BY DEFENDANT AND SAVE ON NETWORK; UPLOAD TO DROPBOX; EMAIL TO JT	BILLABLE	12/6/2022	0.3	\$175.00	\$52.50	JW
Manage data/files DOWNLOAD DOCS PRODUCED BY DEFENDANT; SAVE ON NETWORK; UPLOAD ALL DOCS PRODUCED TO DROPBOX; EMAIL JT WITH LINK TO DROPBOX	BILLABLE	12/5/2022	1	\$175.00	\$175.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files CALENDAR DEFENDANT'S DEADLINE TO FILE MOTION TO COMPEL FURTHER RESPONSES TO SPROGS #4	BILLABLE	12/1/2022	0.1	\$175.00	\$17.50	JW
Manage data/files DOWNLOAD DEF. DOC PRODUCTION BATCH 2; UPLOAD TO NETWORK FILE	BILLABLE	12/1/2022	0.3	\$175.00	\$52.50	JW
Manage data/files LOGIN TO DOCUSIGN TO SEE IF REYES SIGNED VERIFICATION.	BILLABLE	11/30/2022	0.1	\$175.00	\$17.50	JW
Manage data/files CALENDAR DEADLINE FOR DEF. TO PRODUCE DOCUMENTS	BILLABLE	11/30/2022	0.2	\$175.00	\$35.00	JW
Manage data/files FINALIZE RESPONSES TO SPROGS #4 WITH SIGNED VERIFICATION AND POS; SERVE VIA EMAIL TO OPC	BILLABLE	11/30/2022	0.3	\$175.00	\$52.50	JW
Manage data/files FINALIZE RESPONSES TO SPROGS #4 WITH VERIFICATION; UPLOAD TO DOCUSIGN FOR CLIENT SIGNATURE TO VERIFICATION	BILLABLE	11/29/2022	0.4	\$175.00	\$70.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Written Discovery WORK ON RESPONSES TO SPECIAL INTERROGATORIES, SET FOUR.	BILLABLE	11/28/2022	1.3	\$750.00	\$975.00	ARS
Manage data/files EMAIL OPC REQUESTING EXTENSION TO RESPOND TO SPROGS #4; REVIEW DEPO TRANSCRIPT AND MARK-UP SECTIONS REGARDING QUESTIONS IN SPROGS #4; EMAIL ARS	BILLABLE	11/23/2022	1.5	\$175.00	\$262.50	JW
Manage data/files DOWNLOAD AND SAVE DOCS PRODUCED BY DEFENDANT; EMAIL OPC/ARS TO CONFIRM DOCS HAVE BEEN DOWNLOADED	BILLABLE	11/21/2022	0.2	\$175.00	\$35.00	JW
Manage data/files DOWNLOAD AND SAVE DEPO TRANSCRIPT OF ROBERT WHITECOTTON AND EXHIBITS	BILLABLE	11/17/2022	0.3	\$175.00	\$52.50	JW
Manage data/files SAVE ROBERT WHITECOTTON TRANSCRIPT AND EXHIBITS ON NETWORK	BILLABLE	11/17/2022	0.2	\$175.00	\$35.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files DOWNLOAD AND SAVE DEF. RFPD #2; CALENDAR RESPONSES	BILLABLE	11/7/2022	0.3	\$175.00	\$52.50	JW
Communicate (other external) EMAILS TO AND FROM R. BROWN RE RANDOM SAMPLING.	BILLABLE	11/7/2022	0.2	\$750.00	\$150.00	ARS
Written Discovery BRIEF REVIEW OF REQUEST FOR PRODUCTION OF DOCUMENTS SET TWO PROPOUNDED ON PLAINTIFF H. REYES.	BILLABLE	11/4/2022	0.3	\$750.00	\$225.00	ARS
Communicate (other external) CALLS TO AND FROM R. BROWN RE STATUS OF CASE.	BILLABLE	11/2/2022	0.2	\$750.00	\$150.00	ARS
Communicate (other external) EMAIL JT TONEY RE RANDOMIZED SAMPLE LIST.	BILLABLE	11/2/2022	0.2	\$750.00	\$150.00	ARS
Communicate (other external) EMAILS TO AND FROM R. BROWN RE CLASS SAMPLE DATA.	BILLABLE	10/31/2022	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) EMAIL JT TONEY RE RANDOM SAMPLE LIST.	BILLABLE	10/31/2022	0.2	\$750.00	\$150.00	ARS
Communicate (other external) CALL WITH P. GONZALEZ RE BACKGROUND FACTS, DEPOSITION.	BILLABLE	10/27/2022	2.1	\$750.00	\$1,575.00	ARS
Draft/revise UPDATE CASE PLAN.	BILLABLE	10/27/2022	0.2	\$750.00	\$150.00	ARS
Manage data/files DOWNLOAD AND SAVE DEFENDANT'S SPROGS #4 ON NETWORK; CONFIRM DEADLINE FOR RESPONSES ON CALENDAR	BILLABLE	10/26/2022	0.1	\$175.00	\$17.50	JW
Manage data/files DOWNLOAD STIP AND ORDER TO CONTINUE HEARING ON PLF MOTION TO COMPEL; SAVE ON NETWORK; EMAIL ARS; CALENDAR NEW HEARING DATE	BILLABLE	10/26/2022	0.3	\$175.00	\$52.50	JW
Discovery Motions REVIEW ORDER FROM COURT RE CONTINUANCE OF MOTION TO COMPEL HEARING.	BILLABLE	10/26/2022	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL RE DEPOSITION OF P. GONZALEZ.	BILLABLE	10/26/2022	0.2	\$750.00	\$150.00	ARS
Manage data/files CALENDAR DEPO GABRIELA GARCIA AND REMINDER FOR JW TO ORDER COURT REPORTER	BILLABLE	10/25/2022	0.2	\$175.00	\$35.00	JW
Manage data/files REVISE NOTICE OF DEPO GABRIELA GARCIA; EMAIL ARS	BILLABLE	10/25/2022	0.3	\$175.00	\$52.50	JW
Communicate (in firm) EMAIL CORRESPONDENCE WITH ARS RE: DEPOSITION NOTICES	BILLABLE	10/24/2022	0.3	\$175.00	\$52.50	JW
Written Discovery EMAILS TO AND FROM OPPOSING COUNSELS RE DOCUMENT PRODUCTION, SAMPLING SIZE, AND DEPOSITIONS.	BILLABLE	10/24/2022	0.3	\$750.00	\$225.00	ARS
Manage data/files REVIEW DOCUSIGN FOR VERIFICATION; RE-SEND REMINDER TO CLIENT TO SIGN	BILLABLE	10/20/2022	0.1	\$175.00	\$17.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Written Discovery REVIEW EMAILS; UPLOAD DEF. SUPPL. RESPONSES TO RFPD #1 TO NETWORK; UPLOAD PLF RESPONSES MISSING FROM NETWORK; DOWNLOAD DEF. SPROGS #4 AND UPLOAD TO NETWORK; PREP DRAFT SHELL FOR RESPONSES AND SAVE ON NETWORK; CALENDAR DEADLINE FOR RESPONSES; EMAIL ARS	BILLABLE	10/18/2022	0.7	\$175.00	\$122.50	JW
Written Discovery DOWNLOAD AND REVIEW PLAINTIFF'S RESPONSES TO SPROGS #3; EMAIL ARS RE MISSING RESPONSE; FINALIZE PLAINTIFF'S RESPONSES TO SPROGS #3 IN PDF; PREP VERIFICATION FOR CLIENT SIGNATURE; UPLOAD TO DOCUSIGN	BILLABLE	10/18/2022	0.4	\$175.00	\$70.00	JW
Communicate (in firm) CONFER WITH S. ORNELAS RE BOOKING AIRFARE AND HOTEL FOR CLIENTS' DEPOSITION.	BILLABLE	10/18/2022	0.3	\$750.00	\$225.00	ARS
Manage data/files RE-SEND VERIFICATION FORM TO CLIENT AT BETTER EMAIL ADDRESS;	BILLABLE	10/18/2022	0.2	\$175.00	\$35.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files CHECK DOCUSIGN FOR CLIENT'S SIGNED VERIFICATION; FINALIZE PLAINTIFF'S RESPONSES TO SPROGS #3 WITH POS; EMAIL ARS RE WHETHER TO SERVE WITHOUT VERIFICATION	BILLABLE	10/18/2022	0.2	\$175.00	\$35.00	JW
Manage data/files SERVE OPC WITH RESPONSES TO SPROGS #3 VIA EMAIL; CALENDAR DEADLINE FOR DEF TO FILE MOTION TO COMPEL	BILLABLE	10/18/2022	0.2	\$175.00	\$35.00	JW
Communicate (other external) EMAILS TO AND FROM R. BROWN RE DEPOSITION OF PMQ CATEGORIES COVERED Y MS. GARCIA.	BILLABLE	10/18/2022	0.3	\$750.00	\$225.00	ARS
Communicate (in firm) EMAIL CORRESPONDENCE WITH ARS RE: DISCOVERY RESPONSES	BILLABLE	10/17/2022	0.1	\$175.00	\$17.50	JW
Communicate (with client) CALL WITH CLIENT RE PREPARATION OF RESPONSES TO SPECIAL INTERROGATORIES, SET III.	BILLABLE	10/17/2022	1.9	\$750.00	\$1,425.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Review/analyze REVIEW DEPOSITION TRANSCRIPT FROM WORKER'S COMP CASE.	BILLABLE	10/17/2022	0.8	\$750.00	\$600.00	ARS
Written Discovery REVIEW DEFENDANT'S SUPPLEMENTAL RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE.	BILLABLE	10/17/2022	0.3	\$750.00	\$225.00	ARS
Written Discovery WORK ON FINALIZING RESPONSES TO SPECIAL INTERROGATORIES, SET III.	BILLABLE	10/17/2022	2.2	\$750.00	\$1,650.00	ARS
Written Discovery PREP SHELL FOR RESPONSES TO SPROGS #3	BILLABLE	10/12/2022	0.4	\$175.00	\$70.00	JW
Draft/revise REVIEW FILE AND UPDATE CASE PLAN.	BILLABLE	10/10/2022	0.2	\$750.00	\$150.00	ARS
Communicate (in firm) STRATEGY REVIEW RE SECOND POTENTIAL PLAINTIFF.	BILLABLE	10/6/2022	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files REVIEW EMAILS; CALENDAR MOTION TO COMPEL DEADLINES AND HEARING DATE; LOOK UP REMOTE HEARING INFO AND ADD TO PANTHER	BILLABLE	10/4/2022	0.4	\$175.00	\$70.00	JW
Manage data/files DOWNLOAD AND SAVE COURT'S ORDER AFTER IDC	BILLABLE	10/4/2022	0.1	\$175.00	\$17.50	JW
Manage data/files DOWNLOAD AND SAVE NOTICE OF DEPO OF IMELDA REYES TRUJILLO; CALENDAR DEPO AND DEADLINE TO OBJECT	BILLABLE	10/4/2022	0.2	\$175.00	\$35.00	JW
Draft/revise PREP NOTICE OF DEPO PMQ GABRIELA GARCIA; EMAIL ARS	BILLABLE	10/3/2022	0.5	\$175.00	\$87.50	JW
Manage data/files DOWNLOAD AND SAVE STIP AND PROTECTIVE ORDER ON NETWORK; EMAIL ARS	BILLABLE	9/29/2022	0.1	\$175.00	\$17.50	JW
Manage data/files FINALIZE PLAINTIFF'S BRIEF RE: INFORMAL DISCOVERY CONFERENCE WITH POS; SERVE OPC VIA EMAIL; UPLOAD TO J&J FOR FILING	BILLABLE	9/28/2022	0.5	\$175.00	\$87.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files DOWNLOAD STIP AND PROTECTIVE ORDER; ADD ARS SIGNATURE; EMAIL OPC; UPLOAD FINAL VERSION OF PLAINTIFF'S BRIEF RE: INFORMAL DISCOVERY CONFERENCE TO NETWORK	BILLABLE	9/28/2022	0.3	\$175.00	\$52.50	JW
Review/analyze REVIEW DECLARATION OF C. PONCE.	BILLABLE	9/27/2022	0.3	\$750.00	\$225.00	ARS
Communicate (other external) EMAILS TO AND FROM R. BROWN RE DISCOVERY, PROTECTIVE ORDER, PMQ DEPOSITION.	BILLABLE	9/27/2022	0.7	\$750.00	\$525.00	ARS
Review/analyze REVIEW PROPOSED PROTECTIVE ORDER.	BILLABLE	9/27/2022	0.4	\$750.00	\$300.00	ARS
Review/analyze REVIEW STIPULATION AND PROTECTIVE ORDER. CONFER WITH OPPOSING COUNSEL RE SAME.	BILLABLE	9/27/2022	0.4	\$750.00	\$300.00	ARS
Review/analyze REVIEW DECLARATION OF S. HERNANDEZ.	BILLABLE	9/27/2022	0.3	\$750.00	\$225.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Discovery Motions WORK ON PLAINTIFF'S INFORMAL DISCOVERY CONFERENCE BRIEF.	BILLABLE	9/27/2022	0.6	\$750.00	\$450.00	ARS
Manage data/files DOWNLOAD TRANSCRIPT OF GAMINO AND SAVE ON NETWORK	BILLABLE	9/20/2022	0.2	\$175.00	\$35.00	JW
Communicate (with client) CALL TO CLIENT RE UPCOMING DEPOSITION.	BILLABLE	9/20/2022	0.1	\$750.00	\$75.00	ARS
Depositions WORK ON SETTING UP DEPOSITION PREP FOR CLIENTS.	BILLABLE	9/15/2022	0.2	\$750.00	\$150.00	ARS
Draft/revise REVIEW COURT ORDER RE: INFORMAL DISCOVERY CONFERENCE AND RULES FOR BRIEF; PREP DRAFT PLAINTIFF'S BRIEF RE: INFORMAL DISCOVERY CONFERENCE; EMAIL ARS	BILLABLE	9/14/2022	0.6	\$175.00	\$105.00	JW
Court Mandated Conferences REVIEW MINUTE ORDER RE NOTICE OF FURTHER CMC.	BILLABLE	9/9/2022	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
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[Manage data/files](#)

DOWNLOAD AND SAVE OPC
MEET AND CONFER LETTER;
CALENDAR EVEN FOR ARS TO
REVIEW LETTER; CALENDAR
FURTHER CMC AND DEADLINE
TO FILE CMC STATEMENT;
DOWNLOAD AND SAVE
ENCLOSURES TO OPC LETTER;
EMAIL ARS RE WHERE TO SAVE
AND WHETHER TO CALENDAR;
SAVE DISCOVERY AND DEPO
NOTICE ON NETWORK;
CALENDAR DISCOVERY
RESPONSES AND DEPO OF
PLAINTIFF; EMAIL ARS

BILLABLE

9/9/2022

0.7

\$175.00

\$122.50

JW

[Manage data/files](#)

CALENDAR IDC AND ADD TEAMS
LINK; EMAIL ARS

BILLABLE

9/8/2022

0.1

\$175.00

\$17.50

JW

[Communicate \(in firm\)](#)

EMAIL CORRESPONDENCE WITH
ARS RE DEPO NOTICES

BILLABLE

9/8/2022

0.1

\$175.00

\$17.50

JW

[Communicate \(other external\)](#)

REVIEW LETTER FROM K. WILSON
RE DISCOVERY ISSUES.

BILLABLE

9/8/2022

0.3

\$750.00

\$225.00

ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Depositions WORK ON NOTICE OF DEPOSITION OF PERSON MOST QUALIFIED AT DINSMORE ENTERPRISES.	BILLABLE	9/8/2022	0.3	\$750.00	\$225.00	ARS
Depositions REVIEW AND FINALIZE DEPOSITION NOTICE FOR G. GARCIA.	BILLABLE	9/8/2022	0.2	\$750.00	\$150.00	ARS
Communicate (other external) EMAILS TO AND FROM R. BROWN RE DEPOSITION SCHEDULE.	BILLABLE	9/8/2022	0.2	\$750.00	\$150.00	ARS
Draft/revise CALENDAR DEPO OF GABRIELA GARCIA; PREP DRAFT NOTICE OF DEPO GABRIELA GARCIA; EMAIL ARS; PREP DRAFT NOTICE OF DEPO PMQ; UPLOAD DEPO NOTICES TO NETWORK; FINALIZE NOTICE OF DEPO OF GABRIELA GARCIA WITH POS; FINALIZE NOTICE OF DEPO PMQ WITH POS; UPLOAD FINAL DEPO NOTICES TO NETWORK; SERVE OPC VIA EMAIL	BILLABLE	9/8/2022	1.1	\$175.00	\$192.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL RE DISCOVERY ISSUES.	BILLABLE	9/7/2022	0.3	\$750.00	\$225.00	ARS
Communicate (other external) MULTIPLE COMMUNICATIONS WITH R. WALKER RE SETTING IDC.	BILLABLE	9/7/2022	0.3	\$750.00	\$225.00	ARS
Depositions ATTEND DEPOSITION OF MR. GAMINO.	BILLABLE	9/2/2022	6	\$750.00	\$4,500.00	ARS
Manage data/files CHECK COURT DOCKET TO SEE IF CMC STILL ON CAL FOR TODAY; LOOK UP HOW TO APPEAR REMOTELY; ADD REMOTE APPEARANCE LINK/DIAL-IN TO PANTHER; EMAIL ARS	BILLABLE	9/1/2022	0.2	\$175.00	\$35.00	JW
Communicate (other external) EMAIL COMPLEX COORDINATOR FOR ADDITIONAL DATES FOR IDC; EMAIL ARS	BILLABLE	9/1/2022	0.1	\$175.00	\$17.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Depositions REVIEW DOCUMENTS IN PREPARATION FOR DEPOSITION OF MR. GAMINO AND WORK ON DEPOSITION OUTLINE.	BILLABLE	9/1/2022	1.7	\$750.00	\$1,275.00	ARS
Manage data/files DOWNLOAD AND SAVE DEPO TRANSCRIPTS	BILLABLE	8/30/2022	0.2	\$175.00	\$35.00	JW
Communicate (other external) MULTIPLE EMAILS TO AND FROM K. WILSON RE DISCOVERY MATTERS.	BILLABLE	8/28/2022	0.3	\$750.00	\$225.00	ARS
Communicate (in firm) EMAIL ARS RE DEPO DATES	BILLABLE	8/26/2022	0.1	\$175.00	\$17.50	JW
Communicate (with client) CALL WITH CLIENT RE \$5000 SETTLEMENT OFFER AND SCHEDULING SECOND SESSION OF DEPOSITION.	BILLABLE	8/26/2022	0.2	\$750.00	\$150.00	ARS
Communicate (other external) CALL TO K. WILSON RE IDC.	BILLABLE	8/26/2022	0.1	\$750.00	\$75.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) EMAILS TO AND FROM R. BROWN RE CMC STATEMENT.	BILLABLE	8/26/2022	0.3	\$750.00	\$225.00	ARS
Draft/revise UPDATE CASE PLAN.	BILLABLE	8/26/2022	0.1	\$750.00	\$75.00	ARS
Manage data/files FINALIZE JOINT CMC STATEMENT WITH POS; SERVE OPC VIA EMAIL; UPLOAD TO J&J PORTAL FOR E-FILING	BILLABLE	8/26/2022	0.6	\$175.00	\$105.00	JW
Communicate (in firm) EMAIL CORRESPONDENCE WITH ARS; RE-SEND DRAFT JOINT CMC STATEMENT	BILLABLE	8/25/2022	0.1	\$175.00	\$17.50	JW
Communicate (other external) EMAILS TO AND FROM K. WILSON RE DEPOSITION SCHEDULE, INFORMAL DISCOVERY CONFERENCE.	BILLABLE	8/25/2022	0.3	\$750.00	\$225.00	ARS
Communicate (in firm) EMAIL CORRESPONDENCE WITH ARS RE: SCHEDULING IDC; DRAFT EMAIL TO OPC FOR ARS REVIEW	BILLABLE	8/24/2022	0.4	\$175.00	\$70.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Draft/revise REVIEW TASK ASSIGNMENT REMINDER; CHECK COURT DOCKET TO ENSURE CMC DATE CORRECT; REVIEW FILES; PREP DRAFT JOINT CMC STATEMENT; UPLOAD TO NETWORK; EMAIL ARS	BILLABLE	8/24/2022	0.5	\$175.00	\$87.50	
Manage data/files DOWNLOAD AND SAVE REYES SIGNED VERIFICATION FOR RESPONSES TO SPROGS #2; FINALIZE RESPONSES TO SPROGS #2; UPLOAD TO DOCUSIGN AND SEND COPY TO CLIENT; SERVE OPC VIA EMAIL	BILLABLE	8/23/2022	0.5	\$175.00	\$87.50	
Manage data/files CALENDAR DEF. MOTION TO COMPEL DEADLINE RE: SPROGS #2	BILLABLE	8/23/2022	0.1	\$175.00	\$17.50	
Manage data/files PREP VERIFICATION FOR PLAINTIFF'S RESPONSES TO SPROGS #2; UPLOAD VERIFICATION TO DOCUSIGN TO CLIENT	BILLABLE	8/22/2022	0.2	\$175.00	\$35.00	

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Written Discovery WORK ON PLAINTIFF'S RESPONSES TO SPECIAL INTERROGATORIES, SET II, PROPOUNDED BY DEFENDANT.	BILLABLE	8/22/2022	1.6	\$750.00	\$1,200.00	ARS
Draft/revise REVIEW FILE AND UPDATE CASE PLAN.	BILLABLE	8/22/2022	0.2	\$750.00	\$150.00	ARS
Written Discovery PREP RESPONSES TO SPROGS #2; EMAIL ARS	BILLABLE	8/22/2022	0.7	\$175.00	\$122.50	JW
Manage data/files CHECK DEADLINE TO RESPOND TO SPROGS #2; EMAIL ARS.	BILLABLE	8/22/2022	0.2	\$175.00	\$35.00	JW
Manage data/files UPDATE CALENDAR TO ADD ZOOM INFO FOR DEPO MARCOS GAMINO.	BILLABLE	8/19/2022	0.1	\$175.00	\$17.50	JW
Manage data/files DOWNLOAD AND SAVE MEET AND CONFER LETTER WITH ENCLOSURE TO NETWORK; CALENDAR REMINDER FOR ARS TO MEET AND CONFER; DOWNLOAD AND SAVE NOTICE OF DEPO MARCOS GAMINO; CALENDAR DEPOSITION; EMAIL ARS	BILLABLE	8/18/2022	0.2	\$175.00	\$35.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files ADD COMPLEX LITIGATION COORDINATOR TO PANTHER FILE AS RELATIONSHIP	BILLABLE	8/17/2022	0.1	\$175.00	\$17.50	JW
Manage data/files DOWNLOAD AND SAVE DEPO TRANSCRIPT AND EXHIBITS	BILLABLE	8/16/2022	0.2	\$175.00	\$35.00	JW
Manage data/files REVIEW EMAILS; FORWARD EMAIL TO ARS WITH DRAFT EMAIL TO COMPLEX LITIGATION COORDINATOR; EMAIL ROWENA WALKER RE SETTING UP IDC	BILLABLE	8/16/2022	0.6	\$175.00	\$105.00	JW
Manage data/files ADD INSTRUCTIONS FOR SCHEDULING IDC TO PRACTICE PANTHER.	BILLABLE	8/16/2022	0.1	\$175.00	\$17.50	JW
Manage data/files DOWNLOAD AND SAVE OPC LETTER AND SPANISH TRANSLATION OF ALPINE LANDSCAPE'S HANDBOOK	BILLABLE	8/15/2022	0.1	\$175.00	\$17.50	JW
Depositions REVIEW EXHIBITS PRODUCED BY DEFENSE FOR DEPOSITION OF PLAINTIFF.	BILLABLE	8/15/2022	0.8	\$750.00	\$600.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Depositions REVIEW WORKER'S COMPENSATION DEPOSITION OF PLAINTIFF, VOLUME 2.	BILLABLE	8/15/2022	0.9	\$750.00	\$675.00	ARS
Depositions ATTEND DEPOSITION OF H. REYES, VOLUME I.	BILLABLE	8/15/2022	5.8	\$750.00	\$4,350.00	ARS
Communicate (with client) CONFER WITH CLIENT RE DEPOSITION EXHIBITS AND WORKER'S COMPENSATION TESTIMONY.	BILLABLE	8/15/2022	0.8	\$750.00	\$600.00	ARS
Communicate (with client) IN PERSON MEETING WITH CLIENT TO PREPARE FOR DEPOSITION TOMORROW.	BILLABLE	8/14/2022	2.5	\$750.00	\$1,875.00	ARS
Communicate (other external) EMAIL OPPOSING COUNSEL RE DEPOSITION EXHIBITS AND STOP TIME TOMORROW.	BILLABLE	8/14/2022	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files RESEARCH ON SANTA CLARA SUPERIOR COURT WEBSITE FOR CIVIL COMPLEX GUIDELINES AND HOW TO SCHEDULE IDC; EMAIL ARS	BILLABLE	8/9/2022	1.3	\$175.00	\$227.50	JW
Discovery Motions REVIEW COMPLEX CIVIL LITIGATION GUIDELINES RE INFORMAL DISCOVERY CONFERENCE.	BILLABLE	8/9/2022	0.4	\$750.00	\$300.00	ARS
Depositions CALL WITH CLIENT RE DEPOSITION PREP.	BILLABLE	8/9/2022	2.8	\$750.00	\$2,100.00	ARS
Communicate (in firm) RESEARCH RE IDENTIFYING GARDENERS AS CLASS REPRESENTATIVE.	BILLABLE	8/9/2022	0.6	\$750.00	\$450.00	ARS
Draft/revise UPDATE CASE PLAN.	BILLABLE	8/9/2022	0.2	\$750.00	\$150.00	ARS
Manage data/files REVIEW ARS EMAIL; CALENDAR CLIENT FLIGHTS AND DEPO PREP MEETING; EMAIL ARS	BILLABLE	8/9/2022	0.3	\$175.00	\$52.50	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Discovery Motions PREPARE MOTION TO COMPEL FURTHER DISCOVERY RESPONSES AND FILE.	BILLABLE	8/5/2022	3.6	\$750.00	\$2,700.00	ARS
Manage data/files DOWNLOAD AND SAVE DEFENDANT'S SPROGS #2; DECL OPC; CALENDAR RESPONSES	BILLABLE	7/27/2022	0.2	\$175.00	\$35.00	JW
Communicate (other external) MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL RE DEPOSITION SCHEDULE.	BILLABLE	7/27/2022	0.2	\$750.00	\$150.00	ARS
Communicate (in firm) CONFER RE CLIENT'S AVAILABILITY FOR DEPOSITION.	BILLABLE	7/27/2022	0.2	\$750.00	\$150.00	ARS
Communicate (other external) MULTIPLE EMAILS TO AND FROM M. TORRES RE WRITTEN DISCOVERY.	BILLABLE	7/26/2022	0.2	\$750.00	\$150.00	ARS
Written Discovery BRIEF REVIEW OF SPECIAL INTERROGATORIES, SET TWO, PROPOUDNED BY DEFENDANT.	BILLABLE	7/26/2022	0.3	\$750.00	\$225.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) EMAILS TO AND FROM R. BROWN RE PLAINTIFF'S DEPOSITION.	BILLABLE	7/26/2022	0.2	\$750.00	\$150.00	ARS
Manage data/files DOWNLOAD AND SAVE PLAINTIFF'S VERIFICATIONS FOR DISCOVERY RESPONSES; EMAIL OPC COPIES OF VERIFICATIONS	BILLABLE	7/21/2022	0.2	\$175.00	\$35.00	JW
Written Discovery REVIEW EMAILS; REVIEW FROGS - GENERAL AND ARS RESPONSES; EMAIL ARS RE RESPONSE TO NO. 17.1 MISSING; REVISE RESPONSES TO FROGS - EMPLOYMENT LAW #1; REVISE RESPONSES TO SPROGS #1 TO INSERT ARS ANSWERS; EMAIL ARS	BILLABLE	7/20/2022	0.7	\$175.00	\$122.50	JW
Written Discovery DOWNLOAD AND SAVE FINAL RESPONSES TO FROGS - EMPLOYMENT LAW #1; REVISE RESPONSES TO FROGS - GENERAL #1 TO ADD RFA RESPONSES TO 17.1; EMAIL ARS	BILLABLE	7/20/2022	0.4	\$175.00	\$70.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files REVIEW DISCOVERY DOCUMENTS AND EMAILS; FOLLOW UP EMAIL TO ARS RE: VERIFICATIONS	BILLABLE	7/20/2022	0.3	\$175.00	\$52.50	
Communicate (in firm) EMAIL CORRESPONDENCE WITH ARS; CHECK DOCUSIGN FOR VERIFICATIONS; EMAIL ARS	BILLABLE	7/20/2022	0.2	\$175.00	\$35.00	
Written Discovery EMAIL CORRESPONDENCE WITH ARS; FINALIZE FROGS - GEN #1, FROGS - EMPLOYMENT LAW, #1 AND RFA, #1 WITH POS; EMAIL ARS	BILLABLE	7/20/2022	0.4	\$175.00	\$70.00	
Written Discovery FINALIZE RESPONSES TO SPROGS #1 WITH POS; UPLOAD FINAL DISCOVERY RESPONSES TO NETWORK; SERVE DISCOVERY RESPONSES VIA EMAIL TO OPC; CALENDAR DEFENDANT'S MOTION TO COMPEL DEADLINE	BILLABLE	7/20/2022	0.3	\$175.00	\$52.50	

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Written Discovery WORK ON DISCOVERY RESPONSES WITH CLIENT, INCLUDING RESPONSE TO REQUEST FOR ADMISSIONS, SET ONE, SPECIAL INTERROGATORIES, SET ONE, FORM INTERROGATORIES - EMP, SET ONE, AND FORM INTERROGATORIES, GENERAL, SET ONE.	BILLABLE	7/19/2022	4.8	\$750.00	\$3,600.00	ARS
Written Discovery PREP DRAFT RESPONSES TO FROGS - GENERAL, #1 AND INSERT ARS RESPONSES FROM DOC; EMAIL ARS; PREP DRAFT RESPONSES TO FROGS - EMPLOYMENT LAW, #1 AND INSERT ARS RESPONSES; EMAIL ARS; PREP DRAFT RESPONSES TO RFA, #1 AND INSERT ARS RESPONSES; EMAIL ARS	BILLABLE	7/19/2022	1.1	\$175.00	\$192.50	JW
Written Discovery PREP DRAFT VERIFICATIONS FOR RFA #1; SPROGS, #1; FROGS - GENERAL, #1; AND FROGS-EMPLOYMENT LAW, #1; EMAIL ARS	BILLABLE	7/19/2022	0.2	\$175.00	\$35.00	JW
Written Discovery SEND VERIFICATIONS TO CLIENT TO SIGN VIA DOCUSIGN.	BILLABLE	7/19/2022	0.3	\$750.00	\$225.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Written Discovery WORK ON RESPONSES TO DISCOVERY PROPOUNDED BY DEFENDANT.	BILLABLE	6/26/2022	2.8	\$750.00	\$2,100.00	ARS
Written Discovery PREP DRAFT SHELL RESPONSES TO DEF RFA #1; SAVE DRAFT SHELL RESPONSES ON NETWORK; EMAIL ARS	BILLABLE	6/24/2022	1	\$175.00	\$175.00	JW
Written Discovery PREP DRAFT SHELL RESPONSES TO DEF. SPROGS #1	BILLABLE	6/23/2022	1.1	\$175.00	\$192.50	JW
Manage data/files REVIEW DEPO NOTICE AND ADD ZOOM LINK TO PANTHER CALENDAR ENTRY; DOWNLOAD AND SAVE DOCS PRODUCED BY DEFENDANT; CALENDAR DEADLINE FOR ARS TO REVIEW; DOWNLOAD AND SAVE DISCOVERY PROPOUNDED BY DEFENDANT; CALENDAR DEADLINE FOR RESPONSES	BILLABLE	6/21/2022	0.3	\$175.00	\$52.50	JW
Depositions REVIEW DEPOSITION NOTICE TO H. REYES MONREAL.	BILLABLE	6/14/2022	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) MULTIPLE EMAILS TO AND FROM C. OLSON RE DEPOSITION SCHEDULE.	BILLABLE	6/13/2022	0.2	\$750.00	\$150.00	ARS
Communicate (in firm) OBTAIN CLIENT'S AVAILABILITY FOR DEPOSITION AND PREP.	BILLABLE	6/13/2022	0.2	\$750.00	\$150.00	ARS
Communicate (other external) EMAILS TO AND FROM C. OLSON RE DEPOSITION SCHEDULE.	BILLABLE	6/13/2022	0.3	\$750.00	\$225.00	ARS
Written Discovery CALL TO R. BROWN RE DISCOVERY.	BILLABLE	6/10/2022	0.3	\$750.00	\$225.00	ARS
Draft/revise UPDATE CASE PLAN.	BILLABLE	6/10/2022	0.2	\$750.00	\$150.00	ARS
Written Discovery BRIEF REVIEW OF DISCOVERY SERVED BY DEFENDANT ON PLAINTIFF H. REYES.	BILLABLE	6/10/2022	0.5	\$750.00	\$375.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files REVIEW COURT'S NOTICE; CALENDAR CASE MANAGEMENT CONFERENCE AND DEADLINE TO FILE JOINT CMC STATEMENT	BILLABLE	5/20/2022	0.1	\$150.00	\$15.00	JW
Court Mandated Conferences REVIEW NOTICE OF CASE MANAGEMENT CONFERENCE AND SEND TO J. WILKINSON TO CALENDAR.	BILLABLE	5/18/2022	0.2	\$750.00	\$150.00	ARS
Written Discovery PREPARE MEET AND CONFER LETTER RE DEFENDANT'S DEFICIENT INITIAL DISCOVERY RESPONSES.	BILLABLE	5/17/2022	1.6	\$750.00	\$1,200.00	ARS
Draft/revise CALENDAR DATES FROM OUTCOME OF HEARING; PREP DRAFT STIPULATION AND PROPOSED ORDER RE: CLASS CERTIFICATION BRIEFING SCHEDULE	BILLABLE	5/17/2022	0.3	\$150.00	\$45.00	JW
Communicate (other external) EMAIL OPPOSING COUNSEL RE DEFICIENT DISCOVERY RESPONSES.	BILLABLE	5/17/2022	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Court Mandated Conferences REVIEW MATERIALS IN PREPARATION FOR CASE MANAGEMENT CONFERENCE.	BILLABLE	5/12/2022	0.2	\$750.00	\$150.00	ARS
Court Mandated Conferences APPEAR FOR CASE MANAGEMENT CONFERENCE VIA COURT CALL.	BILLABLE	5/12/2022	1.9	\$750.00	\$1,425.00	ARS
Communicate (in firm) EMAIL J. WILKENS ON RE STATUS UPDATE RE CMC HEARING.	BILLABLE	5/12/2022	0.2	\$750.00	\$150.00	ARS
Draft/revise UPDATE CASE PLAN.	BILLABLE	5/12/2022	0.1	\$750.00	\$75.00	ARS
Written Discovery REVIEW AND SUMMARIZE FIRST SET OF DISCOVERY RESPONSES FROM DEFENDANT DINSMORE ENTERPRISES, INC.	BILLABLE	5/10/2022	3.3	\$750.00	\$2,475.00	ARS
Communicate (with client) CALL WITH CLIENT RE STATUS.	BILLABLE	5/9/2022	1.3	\$750.00	\$975.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Court Mandated Conferences UPDATE JOINT CMC STATEMENT AND SEND TO OPPOSING COUNSEL FOR REVIEW.	BILLABLE	5/9/2022	0.3	\$750.00	\$225.00	ARS
Court Mandated Conferences PREPARE JOINT CMC STATEMENT AND SEND TO OPPOSING COUNSEL FOR HER INPUT.	BILLABLE	5/4/2022	0.4	\$750.00	\$300.00	ARS
Written Discovery REVIEW EMAIL FROM OPPOSING COUNSEL'S OFFICE RE DEFENDANT'S DISCOVERY RESPONSES.	BILLABLE	4/27/2022	0.1	\$750.00	\$75.00	ARS
Communicate (other external) EMAILS TO AND FROM C. OLSEN RE DISCOVERY.	BILLABLE	4/19/2022	0.2	\$750.00	\$150.00	ARS
Communicate (other external) MULTIPLE COMMUNICATIONS WITH R. BROWN, ESQ., RE DEFENDANT'S DISCOVERY RESPONSES, DEPOSITION SCHEDULE.	BILLABLE	3/31/2022	0.3	\$750.00	\$225.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Draft/revise UPDATE CASE PLAN.	BILLABLE	3/31/2022	0.2	\$750.00	\$150.00	ARS
Communicate (with client) CALL WITH CLIENT RE PREP FOR DEPOSITION.	BILLABLE	3/22/2022	1.7	\$750.00	\$1,275.00	ARS
Document Production WORK ON FINALIZING RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE.	BILLABLE	3/22/2022	0.2	\$750.00	\$150.00	ARS
Communicate (with client) CALL WITH CLIENT REGARDING DEPOSITION AND DISCOVERY.	BILLABLE	3/14/2022	1.6	\$750.00	\$1,200.00	ARS
Written Discovery WORK ON RESPONSES TO DEMAND FOR PRODUCTION OF DOCUMENTS, SET ONE.	BILLABLE	3/14/2022	0.9	\$750.00	\$675.00	ARS
Written Discovery WORK ON REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE TO DEFENDANT.	BILLABLE	3/7/2022	1.1	\$750.00	\$825.00	ARS
Written Discovery WORK ON FORM INTERROGATORIES, SET ONE, PROPOUNDED TO DEFENDANT.	BILLABLE	3/7/2022	0.9	\$750.00	\$675.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Written Discovery WORK ON SPECIAL INTERROGATORIES, SET ONE, PROPOUNDED TO DEFENDANT.	BILLABLE	3/7/2022	0.9	\$750.00	\$675.00	ARS
Written Discovery WORK ON REQUEST FOR ADMISSIONS SET ONE, PROPOUNDED TO DEFENDANT.	BILLABLE	3/7/2022	1.3	\$750.00	\$975.00	ARS
Review/analyze REVIEW FILE AND UPDATE CASE PLAN.	BILLABLE	3/4/2022	0.2	\$750.00	\$150.00	ARS
Pleading REVIEW DEFENDANTS' ANSWER TO COMPLAINT.	BILLABLE	3/3/2022	0.2	\$750.00	\$150.00	ARS
Court Mandated Conferences APPEAR FOR CASE MANAGEMENT CONFERENCE.	BILLABLE	2/3/2022	1.5	\$750.00	\$1,125.00	ARS
Court Mandated Conferences REVIEW CMC STATEMENT IN PREPARATION FOR CASE MANAGEMENT CONFERENCE.	BILLABLE	2/3/2022	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Court Mandated Conferences REVIEW REDLINES TO PROPOSED JOINT ISC STATEMENT. CONFER WITH J. WILKINSON RE FINALIZING AND FILING.	BILLABLE	1/21/2022	0.2	\$750.00	\$150.00	ARS
Court Mandated Conferences EMAILS TO AND FROM C. OLSON RE CMC STATEMENT, INFORMAL DISCOVERY, MEDIATION.	BILLABLE	1/18/2022	0.3	\$750.00	\$225.00	ARS
Court Mandated Conferences EMAIL OPPOSING COUNSEL RE JOINT CMC STATEMENT.	BILLABLE	1/11/2022	0.2	\$750.00	\$150.00	ARS
Review/analyze REVIEW SIGNED ACKNOWLEDGEMENT OF RECEIPT FROM OPPOSING COUNSEL.	BILLABLE	1/10/2022	0.2	\$750.00	\$150.00	ARS
Pleading REVIEW CONFORMED SUMMONS, COMPLAINT AND ACCOMPANYING DOCUMENTS. CONFER WITH J. WILKINSON RE SERVING ON OPPOSING COUNSEL AND SENDING COPY TO CLIENT.	BILLABLE	12/7/2021	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Court Mandated Conferences WORK ON JOINT CASE MANAGEMENT CONFERENCE STATEMENT AND SEND TO OPPOSING COUNSEL FOR REVIEW AND INPUT.	BILLABLE	12/2/2021	0.5	\$750.00	\$375.00	ARS
Manage data/files REVIEW ONE LEGAL WEBSITE FOR COST TO ADVANCE FEES; PREPARE ESTIMATE FOR ARS RE COST TO FILE NOTICE OF PAYMENT OF COMPLEX FEE	BILLABLE	11/12/2021	0.2	\$150.00	\$30.00	JW
Manage data/files FINALIZE NOTICE OF PAYMENT OF COMPLEX FEE IN PDF; EMAIL CORRESPONDENCE WITH A. SALUSKY; SAVE FINAL DOCUMENTS IN CASE FILE	BILLABLE	11/9/2021	0.3	\$150.00	\$45.00	JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files REVIEW ONE LEGAL WEBSITE ORDER FOR STATUS OF AMENDED SUMMONS; REVIEW SANTA CLARA SUPERIOR COURT CASE DOCKET FOR AMENDED SUMMONS; EMAIL CORRESPONDENCE WITH A. SALUSKY; DOWNLOAD AND SAVE ORDER DEEMING MATTER COMPLEX; CALENDAR DATES PER ORDER; REVIEW ONE LEGAL BILLING FILES AND SANTA CLARA SUPERIOR COURT DOCKET RE WHETHER COMPLEX FEE PAID; PREPARE DRAFT NOTICE OF PAYMENT OF COMPLEX FEE; EMAIL CORRESPONDENCE WITH A. SALUSKY; RESEARCH CALIFORNIA SECRETARY OF STATE BUSINESS PORTAL FOR CORRECT DEFENDANT NAME	BILLABLE	11/8/2021	1.8	\$150.00	\$270.00	JW
Manage data/files REVIEW ONE LEGAL WEBSITE FOR STATUS OF CONFORMED COPY OF SUMMONS	BILLABLE	10/26/2021	0.1	\$150.00	\$15.00	JW
Review/analyze REVIEW PERSONNEL FILE IN PREPARATION FOR CALL WITH OPPOSING COUNSEL.	BILLABLE	10/20/2021	0.5	\$750.00	\$375.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) CALL WITH R. MASON RE INTRODUCTION, BACKGROUND FACTS OF CASE.	BILLABLE	10/20/2021	0.2	\$750.00	\$150.00	ARS
Communicate (other external) EMAIL R. MASON RE MEDIATION.	BILLABLE	10/20/2021	0.1	\$750.00	\$75.00	ARS
Manage data/files REVIEW ONE LEGAL ORDERS; INTEROFFICE EMAIL CORRESPONDENCE WITH ARS RE: AMENDED SUMMONS CONFORMED COPY NOT RECEIVED YET; PREPARE DRAFT NOTICE AND ACKNOWLEDGEMENT OF RECEIPT FORM AND EMAIL TO ARS; SAVE IN CORE VAULT FILE	BILLABLE	10/20/2021	0.4	\$150.00	\$60.00	JW
Communicate (other external) EXTERNAL EMAIL CORRESPONDENCE WITH SKYLINE RE: AMENDED SUMMONS NOT REISSUED YET	BILLABLE	10/12/2021	0.2	\$150.00	\$30.00	JW
Pleading CONFER WITH J. WILKINSON RE SUMMONS AND COMPLAINT.	BILLABLE	10/11/2021	0.2	\$750.00	\$150.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
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[Manage data/files](#)

REVIEW SUMMONS; PREP DRAFT
AMENDED SUMMONS TO
CORRECT DEFENDANT NAME;
INTEROFFICE EMAIL
CORRESPONDENCE WITH ARS;
UPLOAD AMENDED SUMMONS
TO ONE LEGAL FOR FILING

BILLABLE

10/11/2021

0.5

\$150.00

\$75.00

JW

[Manage data/files](#)

RESEARCH CALIFORNIA
SECRETARY OF STATE BUSINESS
PORTAL FOR AGENT FOR
SERVICE INFORMATION FOR
DEFENDANT; UPLOAD SUMMONS
AND COMPLAINT TO ONE LEGAL
FOR SERVICE ON DEFENDANT;
INTEROFFICE EMAIL
COMMUNICATION WITH ARS RE:
CHARGES FOR SERVICE OF
PROCESS; EXTERNAL E-MAIL
COMMUNICATION WITH
SKYLINE RE: RATES FOR SERVICE
OF PROCESS; EXTERNAL EMAIL
COMMUNICATION WITH SKYLINE
RE: ORDER TO SERVE SUMMONS
AND COMPLAINT ON
DEFENDANT

BILLABLE

10/8/2021

1.2

\$150.00

\$180.00

JW

[Manage data/files](#)

DOWNLOAD AND SAVE
CONFORMED COPIES OF
SUMMONS, CIVIL CASE COVER
SHEET, AND COMPLAINT IN CORE
VAULT FILE; INTEROFFICE EMAIL
COMMUNICATION WITH AGS

BILLABLE

10/7/2021

0.5

\$150.00

\$75.00

JW

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Review/analyze REVIEW AND PROOFREAD COMPLAINT; INTEROFFICE COMMUNICATION	BILLABLE	9/16/2021	0.3	\$150.00	\$45.00	JW
Pleading WORK ON REVISIONS TO COMPLAINT.	BILLABLE	8/25/2021	0.8	\$750.00	\$600.00	ARS
Pleading REVISE COMPLAINT AND EMAIL TO A. SERRANO FOR FILING.	BILLABLE	8/25/2021	0.6	\$750.00	\$450.00	ARS
Draft/revise UPDATE CASE PLAN.	BILLABLE	8/25/2021	0.2	\$750.00	\$150.00	ARS
Review/analyze REVIEW AND REVISE PAGA LETTER FOR FILING.	BILLABLE	6/16/2021	0.3	\$750.00	\$225.00	ARS
Communicate (in firm) CONFER WITH A. SERRANO RE FOLLOWUP WITH CLIENT RE UNIFORM POLICY AND FILING PAGA LETTER.	BILLABLE	6/16/2021	0.2	\$750.00	\$150.00	ARS
Pleading REVIEW FILE AND PREPARE PAGA LETTER.	BILLABLE	5/28/2021	1.7	\$750.00	\$1,275.00	ARS

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) CALL WITH REP FROM BERKSHIRE HATHAWAY RE CONFIRMATION THAT THIS IS A CIVIL AS OPPOSED TO W/C MATTER.	NOT BILLABLE	5/18/2021	0.2	\$750.00	\$150.00	ARS
Research RESEARCH WORKER'S COMP ATTORNEYS FOR H. REYES IN THE HOLLISTER AREA.	BILLABLE	4/22/2021	0.5	\$750.00	\$375.00	ARS
Review/analyze REVIEW INTAKE.	BILLABLE	4/8/2021	0.5	\$750.00	\$375.00	ARS
			351.10	\$197,435.00 USD		

EXHIBIT 2

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Filing Janney & Janney - Final Approval Filing	BILLABLE	7/21/2025	\$72.00	\$72.00	1	SP
Other AAA Attorney Services - Personally serve the Final Approval documents to Jose Garay	BILLABLE	7/21/2025	\$130.00	\$130.00	1	SP
Filing Janney & Janney - filing fee for proposed order in support of Motion for Final Approval of Class Action and PAGA Settlement.	BILLABLE	7/21/2025	\$17.77	\$17.77	1	ARS
Filing Janney & Janney - Declaration of Anna Salusky in Support of Motion For Final Approval of Class Action and PAGA Settlement	BILLABLE	7/21/2025	\$17.77	\$17.77	1	ARS
Filing Janney & Janney - Declaration of Garvin Brown in Support of Motion For Final Approval of Class Action and PAGA Settlement	BILLABLE	7/21/2025	\$17.77	\$17.77	1	ARS
Filing Janney & Janney - Declaration of H. Reyes in Support of Motion For Final Approval of Class Action and PAGA Settlement.	BILLABLE	7/21/2025	\$17.77	\$17.77	1	ARS

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Filing Janney & Janney - Declaration of P. Gonzalez in Support of Motion For Final Approval of Class Action and PAGA Settlement.	BILLABLE	7/21/2025	\$17.77	\$17.77	1	ARS
Other Color Printing \$.20 per page for color Total color pages 1708	BILLABLE	7/21/2025	\$341.60	\$341.60	1	SP
Other Black and White Printing \$.05 per page for black and white Total 1200	BILLABLE	7/21/2025	\$60.00	\$60.00	1	SP
Filing Janney & Janney - Notice of Entry or Order Granting Preliminary Approval of Class Action and PAGA Settlement	BILLABLE	3/3/2025	\$17.77	\$17.77	1	SP
Filing Janney & Janney - Declaration of Humberto Reyes Monreal in Support of Request for Incentive Award	BILLABLE	2/6/2025	\$17.77	\$17.77	1	SP
Filing Janney & Janney - Motion Preliminary Approval	BILLABLE	1/30/2025	\$79.57	\$79.57	1	SP

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Filing Janney & Janney - Supplemental Declaration of Anna Salusky in Support of Motion For Preliminary Approval of Class Action and PAGA Settlement	BILLABLE	1/29/2025	\$17.77	\$17.77	1	SP
Experts JT Calcs - Damage Analysis	BILLABLE	1/30/2024	\$1,150.00	\$1,150.00	1	SP
Arbitrators/mediators Mediation Fee - Steven Rottman	BILLABLE	1/9/2024	\$14,000.00	\$14,000.00	1	ARS
Outside printing Black and White Printing 1200 pages x .05= 60.00	BILLABLE	11/14/2023	\$60.00	\$60.00	1	SP
Other Color Printing 1708 pages x .20 =341.60	BILLABLE	11/14/2023	\$341.60	\$341.60	1	SP
Filing Janney & Janney - Plaintiff's Brief Re: Informal Discovery Conference	BILLABLE	10/14/2023	\$16.19	\$16.19	1	SP
Filing Janney & Janney - Joint Case Management Statement	BILLABLE	10/4/2023	\$16.19	\$16.19	1	SP
Filing Janney and Janney - Notice of Ruling at Case Management Conference	BILLABLE	7/26/2023	\$16.19	\$16.19	1	SP

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Deposition transcripts Deposition Transcript - Pedro Gonzalez billed by Kim Meierotto, CSR, Invoice No. 23399	BILLABLE	7/19/2023	\$645.50	\$645.50	1	ARS
Filing Janney and Janney - CMC Statement	BILLABLE	7/17/2023	\$16.27	\$16.27	1	SP
Filing Janney & Janney - Amended Complaint	BILLABLE	4/14/2023	\$16.27	\$16.27	1	SP
Filing Janney & Janney - Joint CMC Statement	BILLABLE	4/13/2023	\$36.87	\$36.87	1	SP
Deposition transcripts Intrepid Deposition - Deposition of Gabriela Garcia	BILLABLE	3/31/2023	\$1,485.35	\$1,485.35	1	SP
Out-of-town travel Flights for deposition - Pedro Gonzalez	BILLABLE	2/14/2023	\$242.96	\$242.96	1	SP
Filing Janney & Janney - Stipulation and Order	BILLABLE	12/21/2022	\$36.87	\$36.87	1	SP
Deposition transcripts Deposition Transcript for Mr. Reyes and Mrs. Reyes. Kim Meierotto, CSR. Invoice No. 22671.	BILLABLE	11/1/2022	\$815.50	\$815.50	1	ARS

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Out-of-town travel Hotel for Reyes Deposition (Hilton)	BILLABLE	10/18/2022	\$340.27	\$340.27	1	ARS
Out-of-town travel Flights for Reyes deposition (Southwest) - Mr. Reyes	BILLABLE	10/18/2022	\$685.26	\$685.26	1	ARS
Out-of-town travel Flights for deposition (Southwest) - Mrs. Reyes	BILLABLE	10/18/2022	\$685.26	\$685.26	1	ARS
Filing Janney & Janney - Plaintiff's Brief Re: Informal Discovery Conference	BILLABLE	9/28/2022	\$15.80	\$15.80	1	SP
Deposition transcripts Deposition Transcript of Marcos Gamino Invoice No. 22547 Kim Meiroto, CSR	BILLABLE	9/19/2022	\$1,092.25	\$1,092.25	1	ARS
Deposition transcripts Kim Meierotto, CSR - Deposition of Humberto Reyes Vol. I	BILLABLE	8/29/2022	\$705.00	\$705.00	1	SP
Filing Janney & Janney - Joint CMC Statement	BILLABLE	8/26/2022	\$15.80	\$15.80	1	SP
Out-of-town travel Hotel and Airfare (Southwest) for Mr. Reyes' deposition, Vol. I.	BILLABLE	8/9/2022	\$683.55	\$683.55	1	ARS

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Courtfees One Legal - Filing Motion to Compel and eservice	BILLABLE	8/5/2022	\$81.30	\$81.30	1	ARS
Filing Janney & Janney - CMC Statement	BILLABLE	5/10/2022	\$15.80	\$15.80	1	SP
Courtfees Janney and Janney Legal Support: eFiling and EFM fees.	BILLABLE	1/26/2022	\$15.80	\$15.80	1	SO
Courtfees Janney and Janney Legal Support: eFiling, court fees advanced tp complete assignment, payment processing fee, and EMF Fees.	BILLABLE	1/11/2022	\$171.05	\$171.05	1	SO
Filing One Legal: Filing amended summons	BILLABLE	12/17/2021	\$18.24	\$18.24	1	JW
Courtfees One Legal: Court technology fee, Convenience fee.	BILLABLE	12/9/2021	\$5.72	\$5.72	1	SO
Courtfees One Legal: eFiling charge, Convenience fee.	BILLABLE	12/9/2021	\$12.52	\$12.52	1	SO
Courtfees One Legal: Court filing fee, Court technology access fee, eCheck fee	BILLABLE	11/16/2021	\$1,005.80	\$1,005.80	1	SO

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Courtfees One Legal: eFiling charge and Convenience fee	BILLABLE	11/16/2021	\$42.03	\$42.03	1	SO
Courtfees DATE: 9/17/2021 ONE LEGAL ORDER NUMBER: 16931588 COURT TRANSACTION NUMBER: 7289755	BILLABLE	9/17/2021	\$466.16	\$466.16	1	AGS
Courtfees DATE: 9/17/2021 ONE LEGAL ORDER NUMBER: 16933235 COURT TRANSACTION NUMBER: 7291557	BILLABLE	9/17/2021	\$18.24	\$18.24	1	ARS
Uncategorized PAGA NOTICE UPLOADED WITH THE LWDA	BILLABLE	6/17/2021	\$75.00	\$75.00	1	AGS
Other DOCUSIGN ENVELOPE - RETAINER	BILLABLE	5/9/2021	\$4.20	\$4.20	1	AGS
				\$25,876.14 USD		