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Attorneys for Plaintiff, on a representative basis, and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

JOSE MALDONADO, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

ADD-ON COMPUTER PERIPHERALS
LLC, a California Limited Liability
Company; and DOES 1 through 20,
inclusive;

Defendants.

Case No.: 30-2021-01206062-CU-OE-CXC
*[Assigned to Hon. William Claster, Dept
CX104, for all purposes]*

**DECLARATION OF BRIAN J. MANKIN,
ESQ., IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing

Date: March 17, 2023
Time: 9:00 a.m.
Dept: CX104

Complaint filed: June 14, 2021

I, Brian J. Mankin, state and declare:

1. I am an attorney licensed to practice before all of the courts of the State of California. I manage the employment law department and am a partner with the law firm of Lauby Mankin Lauby LLP, which has offices in Orange County and Riverside County. I am thoroughly familiar with and have personal knowledge of all of the facts set forth herein. I submit this declaration in support of Plaintiff's Motion for Final Approval of this Class Action Settlement. If called as a witness, I could and would competently testify thereto.

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1 **COUNSEL'S EXPERIENCE**

2 2. I have been a member, in good standing, of the State Bar of California since 2001.
3 I am admitted to practice in the United States District Courts for the Central and Southern
4 District of California and the Ninth Circuit Court of Appeal and have tried cases in various
5 courts in California.

6 3. I have handled over 500 employee vs. employer litigation matters during my 22
7 years in practice. Over the last 15 years, my practice has almost entirely consisted of
8 representing employees, the majority of which has included class action and representative
9 action wage and hour matters. In total, I have handled over 250 class action and representative
10 action wage/hour cases, and have been appointed by the court as class counsel and have received
11 final court approval and judgment in close to half of those actions to date, and anticipate
12 receiving final approval in many more of those in the future.

13 4. As part of these settlements and judgments, I have recovered in excess of \$250
14 million in damages for my clients and the class members (who often work as nurses, ambulance
15 drivers, technicians, warehouse workers, truck drivers, sales, professional occupations and
16 countless other trades). My team and I once held the record for the largest PAGA-only case in
17 California's history - a \$12.5 million-dollar court approved settlement, which followed extensive
18 litigation, summary adjudication and writs to the CA Supreme Court against a Fortune 50
19 company (*Garcia v. Macy's*, San Bernardino Superior Court).

20 5. I have tried two major class and PAGA cases against Fortune 100 companies over
21 the last few years. I was lead counsel in a PAGA case that my firm tried in the Orange County
22 Superior Court and received a \$425,000 judgment. I was co-counsel in a class action case
23 against Walmart that was tried to the jury in District Court, wherein the jury awarded Plaintiffs
24 over \$6 million. Both cases were appealed, and ultimately the jury trial verdict was affirmed and
25 the PAGA case was reversed and remanded.

26 6. Over the last four or five consecutive years, I have been selected by my peers as a
27 "Super Lawyer" in Employment Litigation, a distinction that only 5% of lawyers receive.

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8. As set forth in the Declaration of Jarrod Salinas on behalf of the Settlement Administrator, Phoenix Settlement Administrators, the Net Settlement Amount is \$262,167.66, after the deductions set forth in the chart here:

9. The process of mailing the Notice Packets was very successful, as 98.8% of the Notice Packets were successfully delivered by the Settlement Administrator.

11. As discussed at length in Plaintiff's motion for preliminary approval, as well as in the Motion for Final Approval, this Settlement is very favorable to the Class and the release is narrowly limited to the claims alleged.

13. I believe that the settlement is fair, reasonable, and adequate, and in the best interests of the Class, given the litigation risks and delay inherent in further litigation and possible appeals. As set forth in Plaintiff's motion for preliminary approval and the declarations

submitted in support thereof, Defendant vigorously challenged Plaintiff's claims, and Plaintiff faced real challenges in certifying the Class and obtaining a recovery on the claims in this matter. Nonetheless, the Parties concluded that further litigation would be protracted and expensive, and that it is desirable that the action be fully and finally settled in the manner and upon the terms and conditions set forth in the Settlement Agreement in order to limit further expense, inconvenience and distraction, to dispose of burdensome and protracted litigation, and to permit the operation of Defendant's business without further expensive litigation and the distraction and diversion of its personnel with respect to matters at issue. All parties considered the uncertainty of risks inherent in any litigation, especially in complex cases such as this case. The parties determined that it is desirable and beneficial to both the Class and Defendant that this case be settled. Risks on both sides were considered in reaching the Settlement Agreement. The recoveries contemplated by the Settlement represent a good result for the Class, fairly proportioned to the likely risk-adjusted recovery in litigation.

ADEQUACY OF COUNSEL

AND REASONABLENESS OF REQUESTED FEE AND COST AWARDS

14. As set forth above, I have handled over 250 class and representative actions. I have been appointed as class counsel and have successfully resolved approximately half of those cases (while many are ongoing and will successfully resolve in the future) while recovering hundreds of millions of dollars for my clients and Class Members. This is substantially better than average accordingly to Mayer Brown LLP's study entitled, An Empirical Analysis of Class Actions, cited in *Laguna v. Coverall North America, Inc.*, No. 12-55479 (9th Cir. 2014), which found that only one-third of class actions are successful, compared to two-thirds that are defeated and result in no payment to the class members.¹

15. When this case was taken on a contingency fee basis, with my firm agreeing to assume responsibility for all litigation costs, the ultimate result was far from certain. In the course of this litigation, Class Counsel paid all costs including filing fees, court costs, research

¹ www.mayerbrown.com/files/uploads/Documents/PDFs/2013/December/DoClassActionsBenefitClassMembers.pdf

1 fees, and mediation costs. There was never a guarantee that we would recoup those expenditures.

2 16. It has been my experience that the benchmark for attorney fee awards in
3 California state cases is one-third of a common settlement fund, which the CA Supreme Court
4 upheld in the Robert Half case. Here, in accordance with the Settlement Agreement, Class
5 Counsel is seeking a fee of \$158,333.33, which is one-third of the Settlement Amount.

6 17. There are several additional factors why I believe that the Court should award
7 one-third of the common fund as reasonable attorneys' fees. First, Class Counsel's efforts
8 resulted in a common fund settlement amount, whereby the Class Members will receive more
9 than \$1,600 on average and up to a maximum of over \$4,000 for those employees that worked
10 the longest during the Class Period. This is a very good result in light of the disputed nature of
11 the claims alleged. This result was achieved by the work and success of my office, who
12 negotiated the settlement after extensive preparation, investigation, mediation, and substantial
13 work thereafter.

14 18. Second, Plaintiff faced significant risks going forward with the litigation. As
15 discussed in the motion for preliminary approval, Defendant raised various defenses throughout
16 this litigation, any one of which, if successful, could have decimated Plaintiff's case. And
17 Defendant vowed to raise all these defenses at trial. Accordingly, Plaintiff faced risky issues
18 going forward with this litigation, and it would have taken several more years to realize any
19 recovery in this action along with the possibility of post-trial appeals.

20 19. Third, Class Counsel are experienced class action litigators. This experience and
21 expertise, combined with the high quality of work performed in this case, resulted in the
22 settlement achieved in this case.

23 20. Fourth, Class Counsel have been representing Plaintiff in this matter strictly on a
24 contingency fee basis. To that end, we have incurred the risk of non-recovery after investing a
25 substantial amount of time, money, and resources, and have done so since the inception of this
26 case without any payment or compensation. If Plaintiff had lost this case, we would have
27 recovered nothing, and would have lost our out-of-pocket costs. This is not an easy burden for
28 my office, which is a small firm. Indeed, I feel that it is important that Class Counsel be

1 compensated for the hardships and risks we faced litigating this contingency case, so that we are
2 incentivized to take on similar cases in the future on behalf of workers. Indeed, not all
3 class/PAGA cases are successful. Many cases end with no fees or a greatly reduced fee that is
4 far less than lodestar, often due to no fault of counsel (i.e., bankruptcy, change in the law,
5 consolidation- coordination-preemption, being top filed, etc.). As noted in the Mayer Brown
6 LLP's study discussed above, only one-third of class actions are successful, compared to two-
7 thirds that are defeated and result in no payment to the class members.

8 21. Fifth, the request for attorney's fees in the amount of one-third of the common
9 fund falls well within the norms accepted by state courts in California in comparable wage and
10 hour actions actually handled by my office. Moreover, the award of a one-third fee recovery
11 under the common fund doctrine was approved by the California Supreme Court in *Laffitte*,
12 *supra*, 1 Cal.5th 480, 503.

13 22. Finally, a one-third fee recovery is less than our projected lodestar through the
14 conclusion of this case.

15 23. For all of the above reasons, a common fund fee award here in the amount of one-
16 third of the common fund created by Plaintiff and Class Counsel is fair and reasonable.

17 24. At my office, this case was primarily handled by my senior associate attorney,
18 Peter Carlson, while I performed the role of the supervising attorney up through mediation, and
19 then largely took over the handling through the settlement and notice process. Mr. Carlson
20 works exclusively with me on employment law matters and has been in practice for 8 years. He
21 bills at the hourly rate of \$575/hour. I have been in practice for 22 years, with most of those
22 years handling complex litigation and for over the last 15 years, my practice has almost entirely
23 consisted of handling class action wage and hour matters. My billing rate is \$775/hour. I
24 believe these rates are consistent with Plaintiff and Defense attorneys who handle complex class
25 action litigation, if not somewhat lower.

26 25. The hourly rates above are comparable to those of other attorneys with equal or
27 similar experience, if not somewhat lower (*i.e.*, the Laffey Matrix at www.laffeymatrix.com
28 indicates that the benchmark rates are: \$676/hour for an 8–10-year attorney, \$764/hour for a 11-

1 19 year attorney, and \$919/hour for a 20+ year attorney). Moreover, the Wolters Kluwer Real
2 Rate Report (“Real Rate Report”), provides directly applicable information in this regard. The
3 Real Rate Report is based on an enormous and statistically significant compilation of data. For
4 instance, in 2017, the report was based on 25.8 million billing entries and 23.9 million hours
5 billed by over 112,100 individual timekeepers from 4,620 law firms, totaling \$9.02 billion in fees
6 billed. The Real Rate Report then compiles and analyzes this data to provide the hourly rates for
7 partners and associates in major metropolitan areas. In 2018, for the southern California area,
8 which is based on billing entries for 999 partners and 1,361 associates, the Real Rate Report
9 states that: (a) the median rate for partners in Los Angeles is \$695 and the upper quartile is \$995
10 per hour, and (b) the median rate for associates in Los Angeles is \$550 and the upper quartile is
11 \$721 (2018 Kluwer Real Rate Report, page 21). And, perhaps most importantly, the information
12 provided in the Real Rate Report is not based on self-reported numbers, surveys, sampling, or
13 reviews or other publications – instead, the Real Rate Report is based on the actual hours and
14 fees billed by law firms.

15 26. The table below includes a summary of the hours worked, plus additional hours
16 that I will bill in finalizing and filing the motion, preparing for and attending the approval
17 hearing, and working with the administrator and defense counsel to issue checks, respond to
18 class members and finalize this matter. The detailed billing records for Mr. Carlson and me are
19 attached hereto as **Exhibit A**. Our aggregated lodestar is approximately \$179,520, resulting in a
20 negative multiplier, as follows:

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Attorney/Timekeeper	Role	Yrs Experience	Rate	Hours	Fee
Brian J. Mankin (Partner)	Trial Counsel	22	\$775	129.4²	\$100,285
Peter Carlson (Senior Associate)	Handling Attorney	8	\$575	137.8	\$79,235
Grand Total for All Attorneys				267.2	\$179,520

27. The fee is warranted because of the results achieved for the Class Members, both in terms of the immediate cash settlement, as well as the fact that the Class Members resoundingly supported the Settlement. Defendant does not oppose this fee request.

28. In the course of prosecuting this action, Class counsel have incurred expenses that were incidental and necessary to the effective representation of the Class. These expenses included but were not limited to: court filings, copying and management of documents, on-line Lexis research, messenger services, postage, fax transmission expenses, transportation, mediation fees, and other incidental expenses directly related to this action. My firm's expenses through the final approval hearing are estimated to be \$9,499.01, which includes filing this motion, process/server costs, overnight service and travel/parking expenses to the hearing (see the itemized statement of these costs attached hereto as **Exhibit B**). Since these actual costs are lower than the \$20,000 allowed under the settlement, the savings will be placed in the Net Settlement Amount for distribution to the Class Members. Defendant does not oppose this request for costs.

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² Includes an estimated 35 hours of future work that will be expended, including 15 hours through the final approval hearing (inclusive of finalizing and filing the motion, appearing at the hearing, addressing the Court's questions/concerns, submitting revised documents, responding to class members who are anxious to receive their check, and so on) and 20 hours after the final approval hearing (which includes 1.5 to 2 years of case management relating to ensuring timely payment from Defendant, reviewing the calculations, checks are timely mailed, responding to class members questions about the timing of checks/missing checks/lost checks and remailings, working with the administrator regarding uncashed checks and remailings, assisting with the Administrator's declarations regarding payments and uncashed checks, potentially filing an amended judgment, appearing at the final disbursement hearing and/or submitting paperwork related thereto).

1 **REASONABLENESS OF REQUESTED SERVICE AWARD**

2 29. I also believe that the service award of \$7,500 to the Class Representative is fair
3 and warranted. Mr. Maldonado came forward and worked directly with my office in analyzing
4 the claims and documents, providing valuable information and insights that benefitted the class
5 (see his declaration for supporting information). Then, during the settlement process, he agreed
6 to a much broader release than any class member, as he released all claims and gave a 1542
7 waiver while foregoing his right to bring individual claims against Defendant. Indeed, Plaintiff's
8 participation was an essential element of Defendant's desire to mediate and of the pre- and post-
9 mediation analysis that allowed Class Counsel to settle the case. Of course, Plaintiff also took on
10 various risks, including the risk that he could have been ordered to pay Defendants' costs if he
11 lost and the risk of retaliation and being black-balled in the industry. Defendant does not oppose
12 the requested service award.

13 **SUBMISSION TO THE LWDA**

14 30. The Motion for Final Approval and supporting declarations have concurrently
15 been submitted to the LWDA. (See **Exhibit C**).

16 **EXHIBITS AND CONCLUSION**

17 31. The Settlement Agreement is Exhibit 1 to ROA #64.

18 32. Attached hereto as Exhibit A are itemized billing records for Mr. Carlson and
19 myself.

20 33. Attached hereto as Exhibit B is a true and correct copy of an itemized statement
21 of my firm's litigation costs.

22 34. The LWDA's confirmation of receipt of this Motion and Declaration is attached
23 hereto as Exhibit C.

24 35. For the foregoing reasons, it is respectfully requested that the Court grant final
25 approval of the settlement as being fair, reasonable, and in the best interest of the class, and
26 approve the requested attorneys' fees, costs, and enhancements.

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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed on February 23, 2023, at Riverside, California.

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4 By: _____
5 Brian J. Mankin, Esq.
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EXHIBIT “A”

Arevalos v. Americor

LML Time Records

Date	Attorney	Description	Hours	Rate	Amount
6/12/2021	Brian J. Mankin	Case development review of new file; review client documents and records produced by employer, online research of employer; review draft LWDA letter and evaluate claims and potential causes of action.	3.00	\$775	\$ 2,325.00
6/14/2021	Brian J. Mankin	Review draft of class complaint prepared by PJC; compare claims to LWDA letter	2.40	\$775	\$ 1,860.00
7/8/2021	Brian J. Mankin	Review multiple correspondence with OC and memo from PJC re service of the complaint, class size, possible arbitration agreement; review file to investigate arbitration issues	1.80	\$775	\$ 1,395.00
8/17/2021	Brian J. Mankin	Case development review; analysis of FAC adding PAGA claims	0.70	\$775	\$ 542.50
9/7/2021	Brian J. Mankin	Review Court's CMO; evaluate status of Def's answer	0.30	\$775	\$ 232.50
9/23/2021	Brian J. Mankin	Review Def's answer and case status	0.20	\$775	\$ 155.00
10/4/2021	Brian J. Mankin	Review memo from PJC re call with OC as to class size, arbitration and possible mediation	0.20	\$775	\$ 155.00
10/26/2021	Brian J. Mankin	Review multiple correspondence with OC re potential mediators and dates; develop plan to require formal discovery if selecting a mediator not available for 11 months	0.60	\$775	\$ 465.00
11/12/2021	Brian J. Mankin	Review memo from PJC re call with OC addressing a concern of engaging in discovery while mediation is pending;	0.20	\$775	\$ 155.00
11/19/2021	Brian J. Mankin	Review multiple correspondence with OC to meet and confer re various drafts of the CMC statement; review same	0.60	\$775	\$ 465.00
11/30/2021	Brian J. Mankin	Review results of CMC and formal discovery to be served on Def along with a Belaire notice	0.70	\$775	\$ 542.50
12/1/2021	Brian J. Mankin	Investigate Judge Weiben Stock as potential mediator	0.50	\$775	\$ 387.50
12/2/2021	Brian J. Mankin	Review multiple correspondence with OC re switching to Judge Stock as mediator and review potential dates	0.20	\$775	\$ 155.00
1/6/2022	Brian J. Mankin	Case development review, including pre-mediation requests, expert retention and other items for mediation	0.50	\$775	\$ 387.50
1/12/2022	Brian J. Mankin	Review memo from PJC re call with OC as to class size and arbitration issues	0.20	\$775	\$ 155.00
2/28/2022	Brian J. Mankin	Case review re status of informal discovery, including review Def's sampling of timekeeping and payroll records, as well as data points for mediation	1.20	\$775	\$ 930.00
3/7/2022	Brian J. Mankin	Review and revise mediation brief, expert analysis and damage exposure analysis	6.80	\$775	\$ 5,270.00
3/9/2022	Brian J. Mankin	Review supplemental expert report; further evaluate damages exposure	1.80	\$775	\$ 1,395.00
3/13/2022	Brian J. Mankin	Prepare for mediation, including reviewing Def's mediation brief and compare to Plaintiff's theories and analysis	5.50	\$775	\$ 4,262.50
3/14/2022	Brian J. Mankin	Attend mediation via Zoom - revise MOU	11.40	\$775	\$ 8,835.00
3/16/2022	Brian J. Mankin	Review OC's changes to the MOU, and further draft revisions	0.70	\$775	\$ 542.50
3/17/2022	Brian J. Mankin	Multiple correspondences with OC re finalizing the MOU	0.30	\$775	\$ 232.50
3/21/2022	Brian J. Mankin	Begin drafting class action settlement agreement	5.50	\$775	\$ 4,262.50
3/22/2022	Brian J. Mankin	Continue drafting SA and prepare class notice; email OC re same	4.80	\$775	\$ 3,720.00
4/6/2022	Brian J. Mankin	Review court's notice of reassignment	0.10	\$775	\$ 77.50
4/21/2022	Brian J. Mankin	Review OC's changes to the SA and Notice; request Admin bids from several administrators; further draft settlement docs	3.70	\$775	\$ 2,867.50
5/5/2022	Brian J. Mankin	Compare admin bids and email OC re same	0.60	\$775	\$ 465.00
5/5/2022	Brian J. Mankin	Meet and confer with OC re need for a protective order	0.30	\$775	\$ 232.50
5/12/2022	Brian J. Mankin	Finalize SA and Notice; review Def's protective order	1.50	\$775	\$ 1,162.50
5/20/2022	Brian J. Mankin	Begin preparing MPA	5.70	\$775	\$ 4,417.50
5/23/2022	Brian J. Mankin	Continue preparing MPA and proposed order	6.20	\$775	\$ 4,805.00

Arevalos v. Americor

LML Time Records

Date	Attorney	Description	Hours	Rate	Amount
5/27/2022	Brian J. Mankin	Multiple correspondences with OC re MPA and SA	0.20	\$775	\$ 155.00
6/6/2022	Brian J. Mankin	Review Def's edits to the MPA and order, finalize same and draft my declaration for filing	3.30	\$775	\$ 2,557.50
7/21/2022	Brian J. Mankin	Review Court's tentative ruling; draft correspondence to OC addressing a resolution as to each point	2.40	\$775	\$ 1,860.00
8/3/2022	Brian J. Mankin	Draft revised SA and notice based on court's tentative	1.60	\$775	\$ 1,240.00
8/15/2022	Brian J. Mankin	Multiple correspondence with OC, administrator and PJC re Court's tentative and changes thereto	0.70	\$775	\$ 542.50
9/1/2022	Brian J. Mankin	Further draft my supplemental declaration ISO MPA	0.90	\$775	\$ 697.50
9/15/2022	Brian J. Mankin	Review tentative ruling; email OC re submitting on same	0.20	\$775	\$ 155.00
9/16/2022	Brian J. Mankin	Draft correspondence to Admin re PA granted and beginning the notice process	0.30	\$775	\$ 232.50
10/17/2022	Brian J. Mankin	Review multiple correspondences and documents from the Admin re notice process	0.50	\$775	\$ 387.50
10/28/2022	Brian J. Mankin	Review Admin's weekly report	0.20	\$775	\$ 155.00
11/4/2022	Brian J. Mankin	Review Admin's weekly report	0.20	\$775	\$ 155.00
11/10/2022	Brian J. Mankin	Review Admin's weekly report	0.20	\$775	\$ 155.00
11/18/2022	Brian J. Mankin	Review Admin's weekly report	0.20	\$775	\$ 155.00
12/2/2022	Brian J. Mankin	Review Admin's weekly report	0.20	\$775	\$ 155.00
12/16/2022	Brian J. Mankin	Review Admin's weekly report	0.20	\$775	\$ 155.00
2/6/2022	Brian J. Mankin	Draft correspondence to Admin re costs and declaration	0.20	\$775	\$ 155.00
2/13/2022	Brian J. Mankin	Begin drafting MFA	5.20	\$775	\$ 4,030.00
2/14/2022	Brian J. Mankin	Continue drafting MFA, order and review Admin's declaration	6.20	\$775	\$ 4,805.00
2/15/2022	Brian J. Mankin	Draft declaration iso MPA; review client and PJC declarations; review Court's CMO and directives at MPA	3.30	\$775	\$ 2,557.50
	Brian J. Mankin	<i>Estimated (through Final Approval)</i> : Finalize Approval Motion and Related Documents; Respond to questions/comments from the Court and prepare any necessary supplemental briefing; Attend Approval Hearing.	15	\$775	\$ 11,625.00
	Brian J. Mankin	<i>Estimated (after Final Approval)</i> : Work with OC and administrator to complete Settlement and mailings of checks/letter; responding to employees questions; submitting final declaration and report of disbursement; attending final disbursement hearing	20	\$775	\$ 15,500.00
Subtotals for Brian J. Mankin			129.4		\$ 100,285.00
2/23/2021	Peter J. Carlson	Review initial client documents and claims	0.70	\$575	\$ 402.50
2/24/2021	Peter J. Carlson	Research potential labor code violations and basic information regarding employer	0.50	\$575	\$ 287.50
4/15/2021	Peter J. Carlson	Draft demand for client's records; Draft demand to preserve evidence and ESI	0.60	\$575	\$ 345.00
5/7/2021	Peter J. Carlson	Exchange emails with defense counsel re: representation	0.30	\$575	\$ 172.50
5/10/2021	Peter J. Carlson	Review 182-page pre-litigation personnel file; Draft memo re same	2.10	\$575	\$ 1,207.50
5/11/2021	Peter J. Carlson	Research to determine whether ProLabs and/or Halo Technology are responsible via joint employer or integrated enterprise; Legal research re: tests for same	2.70	\$575	\$ 1,552.50
5/12/2021	Peter J. Carlson	In-depth search and review of all relevant dockets to determine whether any pending cases against Add-On, ProLabs, and/or Halo Technology	3.10	\$575	\$ 1,782.50
6/3/2021	Peter J. Carlson	Call with client	0.70	\$575	\$ 402.50
6/11/2021	Peter J. Carlson	Draft PAGA letter to LWDA	2.70	\$575	\$ 1,552.50
6/13/2021	Peter J. Carlson	Draft class action complaint	5.40	\$575	\$ 3,105.00

Arevalos v. Americor

LML Time Records

Date	Attorney	Description	Hours	Rate	Amount
6/14/2021	Peter J. Carlson	Further draft class action complaint and prepare for filing	2.10	\$575	\$ 1,207.50
6/21/2021	Peter J. Carlson	Review conformed copy and instruct staff to serve	0.30	\$575	\$ 172.50
7/6/2021	Peter J. Carlson	Case review with BJM	0.30	\$575	\$ 172.50
7/6/2021	Peter J. Carlson	Exchange emails with defense counsel re: service; Research situation re: CEO being served at home; Email agreeing to service via NAR	0.70	\$575	\$ 402.50
7/8/2021	Peter J. Carlson	Phone call with OC; Draft notes to file re: outcome of call	0.60	\$575	\$ 345.00
7/26/2021	Peter J. Carlson	Draft email to OC; Receive NAR	0.30	\$575	\$ 172.50
8/16/2021	Peter J. Carlson	Draft First Amended Complaint adding 8 PAGA causes of action	2.90	\$575	\$ 1,667.50
8/19/2021	Peter J. Carlson	Telephone call with client re: status	0.40	\$575	\$ 230.00
8/19/2021	Peter J. Carlson	Further draft FAC and finalize for filing	0.40	\$575	\$ 230.00
9/7/2021	Peter J. Carlson	Receive and review minute order re: initial CMC; Review Case Management Conference order; Analyze next steps and draft notes to file	1.80	\$575	\$ 1,035.00
9/27/2021	Peter J. Carlson	Review Defendant's Answer; analyze the arbitration affirmative defense and review file to see whether plaintiff signed	0.90	\$575	\$ 517.50
9/29/2021	Peter J. Carlson	Case strategy analysis; Draft email to OC re: whether defendant will agree to informal discovery in lieu of formal	0.80	\$575	\$ 460.00
10/1/2021	Peter J. Carlson	Exchange emails with OC re: scheduling a call	0.20	\$575	\$ 115.00
10/4/2021	Peter J. Carlson	Phone call with OC re: case progression	0.50	\$575	\$ 287.50
10/4/2021	Peter J. Carlson	Analyze facts and determine acceptable list of mediators; email OC re: same	0.70	\$575	\$ 402.50
10/21/2021	Peter J. Carlson	Exchange emails with OC re: proposed mediators	0.20	\$575	\$ 115.00
10/25/2021	Peter J. Carlson	Exchange emails with OC re: meet and confer and LR 315	0.30	\$575	\$ 172.50
10/26/2021	Peter J. Carlson	Exchange additional emails with OC re: mediators	0.50	\$575	\$ 287.50
10/27/2021	Peter J. Carlson	Additional emails with defense counsel re: mediation; Send proposed to either mediate in June or move forward with discovery	0.60	\$575	\$ 345.00
11/1/2021	Peter J. Carlson	Emails with mediator's office to schedule September 13	0.30	\$575	\$ 172.50
11/8/2021	Peter J. Carlson	Review mediation notice and invoice	0.40	\$575	\$ 230.00
11/8/2021	Peter J. Carlson	Prepare email for client update	0.30	\$575	\$ 172.50
11/10/2021	Peter J. Carlson	Exchange emails with OC re: upcoming joint statement	0.30	\$575	\$ 172.50
11/12/2021	Peter J. Carlson	Phone call with defense counsel re: meet and confer and joint statement	0.40	\$575	\$ 230.00
11/15/2021	Peter J. Carlson	Conference with BJM re: strategy for discovery and mediation	0.30	\$575	\$ 172.50
11/16/2021	Peter J. Carlson	Draft Joint Initial CMC statement and send to OC for comment	1.40	\$575	\$ 805.00
11/19/2021	Peter J. Carlson	Review OC's revisions and additions to joint statement; Further draft joint statement with additions for Plaintiff; exchange emails re: same; Finalize joint statement	2.10	\$575	\$ 1,207.50
11/23/2021	Peter J. Carlson	Exchange emails with OC re: switching mediators; Propose new names	0.50	\$575	\$ 287.50
11/29/2021	Peter J. Carlson	Case review and analysis regarding evidence and facts needed for class certification	1.70	\$575	\$ 977.50
11/30/2021	Peter J. Carlson	Appear at Status Conference	0.40	\$575	\$ 230.00
11/30/2021	Peter J. Carlson	Draft full set of written discovery, including SROG, RFP, RFA, and FROGs; Email OC with preemptive extension so no responses due over holiday	4.40	\$575	\$ 2,530.00
12/2/2021	Peter J. Carlson	Exchange emails with OC re: booking mediation with Hon. Judge Wieben Stock	0.60	\$575	\$ 345.00
12/3/2021	Peter J. Carlson	Update client re: status and mediation	0.40	\$575	\$ 230.00

Arevalos v. Americor

LML Time Records

Date	Attorney	Description	Hours	Rate	Amount
12/15/2021	Peter J. Carlson	Receive and review emails from JAMS mediation	0.30	\$575	\$ 172.50
12/21/2021	Peter J. Carlson	Exchange emails with OC and JAMS re: mediation details	0.70	\$575	\$ 402.50
12/21/2021	Peter J. Carlson	Review file and all documents; Analyze outstanding information needed for mediation; Draft lengthy Informal Requests and email same to OC	4.10	\$575	\$ 2,357.50
1/6/2022	Peter J. Carlson	Receive and review notices from JAMS	0.30	\$575	\$ 172.50
1/7/2022	Peter J. Carlson	Exchange emails with OC re: scheduling a call	0.30	\$575	\$ 172.50
1/12/2022	Peter J. Carlson	Telephone call with OC re: pre-mediation requests	0.50	\$575	\$ 287.50
1/21/2022	Peter J. Carlson	Receive email re: first production of pre-mediation documents	0.20	\$575	\$ 115.00
2/15/2022	Peter J. Carlson	Receive email with additional production of pre-mediation documents and data points, including sampling	0.60	\$575	\$ 345.00
2/23/2022	Peter J. Carlson	Exchange emails with statistical expert	0.40	\$575	\$ 230.00
3/2/2022	Peter J. Carlson	Mediation work	2.40	\$575	\$ 1,380.00
3/2/2022	Peter J. Carlson	Exchange additional emails with statistical expert	0.40	\$575	\$ 230.00
3/3/2022	Peter J. Carlson	Status update with client; Further mediation work	2.50	\$575	\$ 1,437.50
3/3/2022	Peter J. Carlson	Draft proposed MOU	1.70	\$575	\$ 977.50
3/4/2022	Peter J. Carlson	Review expert report; exchange emails re: same; Draft mediation brief and damage model	7.80	\$575	\$ 4,485.00
3/4/2022	Peter J. Carlson	Draft email to OC with additional questions re: class data and policies after review of earlier production	1.10	\$575	\$ 632.50
3/7/2022	Peter J. Carlson	Further draft mediation brief and damage model; Conference with BJM re: same	8.20	\$575	\$ 4,715.00
3/8/2022	Peter J. Carlson	Review new email from OC with additional data, information, and company policies; Analyze all new material and incorporate into mediation brief and damage model; Conference with BJM re same	4.20	\$575	\$ 2,415.00
3/8/2022	Peter J. Carlson	Review email from OC with proposed redlines to MOU	0.60	\$575	\$ 345.00
3/9/2022	Peter J. Carlson	Mediation work	2.40	\$575	\$ 1,380.00
3/9/2022	Peter J. Carlson	Exchange additional emails with expert; Submit Plaintiff's timekeeping and payroll for separate analysis; Review same	1.40	\$575	\$ 805.00
3/10/2022	Peter J. Carlson	Pre-mediation call with Judge Wieben Stock	0.40	\$575	\$ 230.00
3/11/2022	Peter J. Carlson	Further draft shared mediation brief; email OC	1.10	\$575	\$ 632.50
3/11/2022	Peter J. Carlson	Review Defendant's 74-page mediation brief, with exhibits	1.90	\$575	\$ 1,092.50
3/14/2022	Peter J. Carlson	Attend mediation	11.40	\$575	\$ 6,555.00
3/17/2022	Peter J. Carlson	Call with client re: mediation	0.30	\$575	\$ 172.50
5/13/2022	Peter J. Carlson	Review and analyze Defendant's proposed SPO	1.10	\$575	\$ 632.50
5/24/2022	Peter J. Carlson	Begin work on Motion for Preliminary Approval and related documents	1.10	\$575	\$ 632.50
5/25/2022	Peter J. Carlson	Continued work on MPA and related documents	1.90	\$575	\$ 1,092.50
5/27/2022	Peter J. Carlson	Call with client re: long-form settlement agreement; Draft email to client	0.80	\$575	\$ 460.00
7/21/2022	Peter J. Carlson	Review Court's tentative ruling on MPA	0.60	\$575	\$ 345.00
8/15/2022	Peter J. Carlson	Draft supplemental declaration for MPA regarding additional information needed; Draft declaration of PJC	4.70	\$575	\$ 2,702.50
9/16/2022	Peter J. Carlson	Review correspondence with Phoenix	0.30	\$575	\$ 172.50
9/20/2022	Peter J. Carlson	Review email from Phoenix with timeline	0.20	\$575	\$ 115.00
10/17/2022	Peter J. Carlson	Review emails from Phoenix with draft notice and preliminary calculations for review; email with approval	0.40	\$575	\$ 230.00
10/19/2022	Peter J. Carlson	Review email from Phoenix re: mailing complete	0.10	\$575	\$ 57.50
10/28/2022	Peter J. Carlson	Review weekly report	0.30	\$575	\$ 172.50
11/4/2022	Peter J. Carlson	Review weekly report	0.20	\$575	\$ 115.00

Arevalos v. Americor

LML Time Records

Date	Attorney	Description	Hours	Rate	Amount
11/11/2022	Peter J. Carlson	Review weekly report	0.20	\$575	\$ 115.00
11/21/2022	Peter J. Carlson	Review weekly report	0.20	\$575	\$ 115.00
11/29/2022	Peter J. Carlson	Review weekly report	0.20	\$575	\$ 115.00
12/5/2022	Peter J. Carlson	Review weekly report	0.20	\$575	\$ 115.00
12/9/2022	Peter J. Carlson	Review weekly report	0.20	\$575	\$ 115.00
12/19/2022	Peter J. Carlson	Review weekly report	0.20	\$575	\$ 115.00
2/6/2023	Peter J. Carlson	Draft declaration of PJC iso MFA	1.10	\$575	\$ 632.50
2/7/2023	Peter J. Carlson	Call with client re: MFA and declaration; Draft declaration of Plaintiff iso MFA	1.80	\$575	\$ 1,035.00
	Peter J. Carlson	<i>Estimated</i> : Telephone calls with Class Members regarding settlement and to update address and/or correct info; Exchange emails with admin re same	10.00	\$575	\$ 5,750.00
	Peter J. Carlson	<i>Estimated</i> : work with BJM and team to prepare for approval hearing and to carry out all necessary tasks post-approval	10.00	\$575	\$ 5,750.00
Subtotals for Peter J. Carlson			137.80		\$ 79,235.00

EXHIBIT “B”

All Expenses

Lauby, Mankin & Lauby LLP

Staff Member = All (Active Only)
Group By Staff Member Group
Client - Project = 14000-00457 Maldonado v Add-On
(Active Only)
Activity Code = All
Expense Code = All
View = Original
Approval Status = All
Selected Expenses = All
From Earliest To Latest

Entered	Status	Approval	BillableType	Expense	Staff Member	Price	Mark Up %	Qty	Amount
<u>Jose Maldonado</u>									
<u>14000-00457 Maldonado v Add-On</u>									
06-14-2021	Approved		Non-Billable	E112 Court fees	Aguilera, Sophia J.	75.00	0.00	1.00	75.00
LWDA Order Number: ORD-000113788 to submit LWDA letter Case Number LWDA-CM-834846-21									
06-14-2021	Approved		Non-Billable	E101 Copying	Aguilera, Sophia J.	0.20	0.00	32.00	6.40
32 copies @ \$0.20 for Letters to Employer									
06-14-2021	Approved		Non-Billable	E108 Postage	Aguilera, Sophia J.	30.28	0.00	1.00	30.28
Postage for the month of June 2021									
06-21-2021	Approved		Non-Billable	E112 Court fees	Aguilera, Sophia J.	1,492.00	0.00	1.00	1,492.00
One Legal Order #16455765 to file Complaint									
06-30-2021	Approved		Non-Billable	E112 Court fees	Aguilera, Sophia J.	14.67	0.00	1.00	14.67
One Legal Order #16536130 to file POS									
06-30-2021	Approved		Non-Billable	Attorney Service	Aguilera, Sophia J.	127.85	0.00	1.00	127.85
Bosco Inv 5826696 Serve: Add-On Computer Peripherals LLC, a California Limited Liability Company Summons; Class Action Complaint; Civil Case Cover Sheet; Guidelines All Complex Civil Departments; ADR Court: Orange County Superior Court - Central Justice Center									
08-02-2021	Approved		Non-Billable	Attorney Service	Aguilera, Sophia J.	16.02	0.00	1.00	16.02
Budget Conferencing Inv 30678881 for 7-8-21 phone conf									
08-24-2021	Approved		Non-Billable	E112 Court fees	Aguilera, Monica A	14.67	0.00	1.00	14.67
One Legal Order #16790461 to file FAC									
11-19-2021	Approved		Non-Billable	E112 Court fees	Aguilera, Monica A	14.67	0.00	1.00	14.67
One Legal Order #17257226 to file Joint Statement									
12-01-2021	Approved		Non-Billable	E112 Court fees	Aguilera, Monica A	94.00	0.00	1.00	94.00
CourtCall ID 11397042 for 11-30-21 Case management conference									
12-16-2021	Approved		Non-Billable	E125 Mediation fees	Aguilera, Monica A	4,850.00	0.00	1.00	4,850.00
JAMS Mediation Inv No. 5986482 - Hon. Nancy Wieben Stock									

All Expenses

Lauby, Mankin & Lauby LLP

Staff Member = All (Active Only)
Group By Staff Member Group
Client - Project = 14000-00457 Maldonado v Add-On
(Active Only)
Activity Code = All
Expense Code = All
View = Original
Approval Status = All
Selected Expenses = All
From Earliest To Latest

Entered	Status	Approval	Billable Type	Expense	Staff Member	Price	Mark Up %	Qty	Amount
Jose Maldonado									
14000-00457 Maldonado v Add-On									
03-14-2022	Approved	Berger Consulting Group Inv#5715	Non-Billable	E119 Experts	Grossi, Tracie L.	2,475.00	0.00	1.00	2,475.00
03-19-2022	Approved		Non-Billable	Attorney Service	Grossi, Tracie L.	12.72	0.00	1.00	12.72
04-15-2022	Approved	Budget Conferencing Inv 30854278 for 3/10/22 conf call	Non-Billable	E112 Court fees	Grossi, Tracie L.	3.20	0.00	1.00	3.20
PACER Fees 1/1/22 - 3/31/22									
07-08-2022	Approved	OneLegal Order# 18334448 - File Motion for Preliminary Approval	Non-Billable	Attorney Service	Chiarito, Tracie	76.96	0.00	1.00	76.96
08-03-2022	Approved		Non-Billable	Attorney Service	Chiarito, Tracie	15.19	0.00	1.00	15.19
OneLegal Order #18662159 - File Ntc of Change of Address									
09-07-2022	Approved	OneLegal Order #18877300 - File Supplemental Decs and Revised Proposed Order on MPA	Non-Billable	Attorney Service	Chiarito, Tracie	15.19	0.00	1.00	15.19
09-21-2022	Approved		Non-Billable	Attorney Service	Chiarito, Tracie	15.19	0.00	1.00	15.19
OneLegal Order #18932183 - file 2nd Revised Proposed Order on PA									
02-23-2023	Approved	Estimated costs to file MFA and supporting documents	Non-Billable	Attorney Service	Chiarito, Tracie	150.00	0.00	1.00	150.00
Project Total									
Client Total									
Grand Total									
9,499.01									
9,499.01									
9,499.01									

EXHIBIT “C”