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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

MIGUEL MONTOYA, NICHOLAS LANE,
and LECOSTEL WILLIAMS, individually,
and on behalf of other members of the
general public similarly situated; JOSE
ROSENDO CAMARILLO, individually, and
on behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiffs,

vs.

AMERON INTERNATIONAL
CORPORATION, a Delaware corporation;
AMERON WATER TRANSMISSION
GROUP, LLC, an unknown limited liability
company; AMERON POLE PRODUCTS
LLC, a Delaware limited liability company;
NOV PROCESS & FLOW
TECHNOLOGIES US, INC., a Delaware
corporation; CONTAINMENT
SOLUTIONS, INC., a Delaware corporation;
CONTAINEMENT SOLUTIONS
SERVICES, INC., a Delaware corporation
NATIONAL OILWELL VARCO, L.P., a
Delaware limited partnership; NOV, INC., an
unknown business entity; NOW OILFIELD
SERVICES, LLC, a Delaware limited
liability company; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: CIVDS1718377

Honorable David S. Cohn
Department S26

CLASS ACTION

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND INCENTIVE
AWARDS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs, and Incentive
Awards; Declaration of Class Counsel (V.
Andre Sherman); Declarations of Class
Representatives (Miguel Montoya, Nicholas
Lane, LeCostel Williams, and Jose Rosendo
Camarillo); Declaration of Settlement
Administrator (Jarrod Salinas); and [Proposed]
Final Approval Order and Judgment filed
concurrently herein]

Date: November 8, 2022
Time: 10:00 a.m.
Department: S26

Complaint Filed: September 20, 2017
FAC Filed: July 1, 2022
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Miguel Montoya, Nicholas Lane, and Jose Rosendo Camarillo (together, “Plaintiffs”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On July 1, 2022, in Department S26 of the above-entitled Court, the Honorable David S. Cohn preliminarily approved the Joint Stipulation and Settlement Agreement of Class Action and PAGA Claims (“Settlement,” “Agreement,” or “Settlement Agreement”), entered into between Plaintiffs Miguel Montoya, Nicholas Lane, LeCostel Williams, and Jose Rosendo Camarillo and Defendants Ameron International Corporation, Ameron Water Transmission Group, LLC, Ameron Pole Products LLC, NOV Process & Flow Technologies US, Inc., Containment Solutions, Inc., Containment Solutions Services, Inc., National Oilwell Varco, L.P., NOV, Inc., and NOW Oilfield Services, LLC (together, “Defendants,” and collectively, with Plaintiffs, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Miguel Montoya, Nicholas Lane, LeCostel Williams, and Jose Rosendo Camarillo to represent the Class (together, “Class Representatives”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC and Sherman & Sherman, APC to represent the Class (together, “Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action and PAGA Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions (“Phoenix” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

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3. As of the date of filing the accompanying Motion for Final Approval, no Class Members have objected to the Class Settlement or the contemplated request for Attorneys' Fees and Costs, Incentive Awards, Settlement Administration Costs, or allocation for the penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, et seq. ("PAGA Allocation").

WORK PERFORMED BY CLASS COUNSEL

4. I and several other attorneys at Lawyers for Justice, PC have been actively engaged in the litigation of the above-captioned action ("*Montoya* Action") since prior to its commencement on September 20, 2017 and the related action entitled *Nicholas Lane v. Ameron Pole Products LLC, et al.*, Ventura County Superior Court Case No. 56-2018-00515902-CU-OE-VTA (the "*Lane* Action") since prior to its commencement on August 6, 2018. Since joining forces with other plaintiff's counsel, Sherman & Sherman, APC, who were pursuing the action entitled *LeCostel Williams v. National Oilwell Varco, LP*, Kern County Superior Court Case No: BCV-20-102399 (the "*Williams* Action"), we have worked closely with that firm to prosecute the cases.

5. Before initiating the *Montoya* Action and *Lane* Action, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiffs Montoya and Lane and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, Plaintiffs Montoya and Williams' claims and allegations, and potential defenses. After conducting initial investigation, our firm determined that the claims of Plaintiffs Montoya and Lane were well-suited for class-wide adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of hourly-paid or non-exempt employees who worked for Defendants, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

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6. Collectively, Class Counsel extensively investigated the veracity, strength, and scope of the claims, engaged in extensive litigation in federal and state court, prepared and fully-briefed a contested motion for class certification in the *Montoya* Action, and were preparing for trial, prior to reaching the Settlement. The cases have involved significant ongoing investigations, research into legal and factual issues, motion practice, and formal and informal discovery. Lawyers for Justice, PC propounded multiple sets of written discovery requests on Defendants (including form interrogatories, special interrogatories, requests for production, and requests for admission), noticed several depositions of Defendants' person(s) most knowledgeable, percipient witnesses, and Defendants' expert in connection with the motion for class certification, reviewed Defendants' responses and objections to written discovery and deposition notices, worked with Plaintiffs Montoya and Lane to provide responses to formal written discovery propounded by Defendants, prepared for and defended the depositions of Plaintiffs Montoya and Lane and percipient witnesses, and prepared for and took the depositions of Defendants' persons most knowledgeable, percipient witnesses, and Defendants' expert in connection with the motion for class certification. Class Counsel reviewed and analyzed a large volume of documents, information, and data obtained from Defendants, Plaintiffs, other Class Members and Aggrieved Employees, percipient witnesses, and other sources. Class Counsel also engaged in the *Belaire-West* notice process and received class contact information. The volume of data and documents that Class Counsel reviewed and analyzed included and was not limited to: Plaintiffs' and other Class Members' employment records, a detailed sampling of Class Members' time and pay data, list of supervisors of non-exempt employees, list of human resources managers for California locations, organizational charts, multiple class contact lists, multiple versions of Defendants' employee manuals and agreements (including, and not limited to, arbitration, waiver, severance, and release/settlement-related agreements, and Defendants' Collective Bargaining Agreements), company policy acknowledgements, internal memoranda, hiring checklist, and Defendants' operations and employment practices, procedures, and policies (including but not limited to Defendants' Code of Business Conduct and Ethics, Business Ethics Policy, Employee-Owned Personal Devices policy, United Steelworkers (USW) Check-Off

1 Authorization, Defendants' Training Handout and corresponding Evaluation Forms, Meal and
2 Rest Break Schedules, On Duty Meal Agreement, and Employee Dispute Resolution Program
3 forms), among other information and documents. Class Counsel interviewed Plaintiffs and other
4 Class Members and Aggrieved Employees to gather facts and to identify potential witnesses.
5 Counsel for the Parties also met and conferred on numerous occasions, e.g., to discuss issues
6 relating to the pleadings, discovery, motions, and the production of documents and data in the
7 course of litigation and in connection with mediation and settlement negotiations. Class Counsel
8 also drafted pleadings, researched and drafted opposition papers (in the *Montoya* Action, with
9 respect to, *inter alia*, demurrer to complaint, multiple motions for sanctions, motion for summary
10 judgment, and ex parte application to stay the proceedings) and researched and drafted motion
11 papers (in the *Montoya* Action, with respect to, *inter alia*, multiple motions to compel further
12 responses to discovery requests and request for monetary sanctions, motion to enforce court's
13 order granting motion to compel and request for monetary sanctions, multiple motions to compel
14 depositions of persons most knowledgeable and request for monetary sanctions, motion to
15 compel deposition of percipient witnesses and request for monetary sanctions, demurrer to
16 answer, motion to strike answer, motion for class certification, and ex parte application to
17 continue deadline to file reply in support of motion for class certification; and in the *Lane*
18 Action, with respect to motion to strike portions of answer (federal court), motion for remand
19 (federal court), motion to strike portions of answer (state court), demurrer to answer (state court),
20 and motion for leave to file amended complaint (state court)), researched and prepared the
21 mediation brief, and prepared for and attended court proceedings, mediation, and settlement
22 negotiations, among other tasks.

23 7. As outlined herein, the Parties conducted significant formal and informal
24 discovery and investigation during the course of litigating the cases. Class Counsel analyzed a
25 large volume of documents, information, and data (in excess of 20,000 pages) obtained from
26 Defendants, Plaintiffs, and other sources. These documents, information, and data provided a
27 critical understanding of the nature of the work performed by the Class Members and Aggrieved
28 Employees, as well as Defendants' operations and employment policies, practices, and

procedures, and were used in analyzing liability, damages, and valuation issues in connection with all phases of the litigation, and ultimately with the mediation and settlement negotiation process. Class Counsel also invested time researching and investigating the applicable law, which is constantly evolving as it relates to certification, representative PAGA claims, off-the-clock theory, meal and rest periods, arbitration agreements, collective bargaining agreements, *Pick Up Stix*/release agreements, wage-and-hour law and enforcement, Plaintiffs' claims and allegations, Defendants' defenses thereto, as well as facts discovered. Accordingly, sufficient investigation and review of information has taken place in order for the Parties to be adequately informed of the nature and extent of Class Members' and Aggrieved Employees' claims, and to enable Parties to fully evaluate the Settlement for its fairness, adequacy, and reasonableness.

8. After aggressively litigating the matter for several years, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the cases. These efforts included participating in a formal, full-day mediation conducted by Eve Wagner, Esq., a well-respected mediator experienced in mediating complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. Prior to, during, and after the mediation, and in the course of settlement discussions, the parties exchanged extensive documents, information, and data and engaged in discussions regarding their evaluations of Plaintiffs' claims, the cases, and various aspects of the cases, including but not limited to, the risks and delays of further litigation, the risks to the parties of proceeding with the pending motion for class certification and trial, the applicable law, the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to all parties was not easy. Defendants and their counsel felt very strongly about their ability to obtain a denial of class certification and prevail on the merits, while Plaintiffs and Class Counsel believed that the motion for class certification would be granted and that they would prevail at trial. After extensive settlement negotiations, with the aid of the mediator's evaluation, the Parties ultimately agreed that the cases were well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the Parties that would attend further litigation. These risks of further litigation include, and are not limited to, a

determination that the claims are unsuitable for class treatment and/or representative adjudication, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the cases, and the real possibility of no monetary recovery after years of litigation.

9. As set forth more fully in the accompanying Motion for Final Approval, Class Counsel seek attorneys' fees in the amount of \$616,666.67, which is one-third (33.33%) of the Gross Settlement Amount of \$1,850,000.00, although under the Settlement they may seek attorneys' fees in a higher amount (i.e., up to \$647,500.00, which is one-third (33.33%) of the Gross Settlement Amount of \$1,850,000.00). The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel have dedicated to the cases; (3) the skill and determination that Class Counsel have shown; (4) the results that Class Counsel have achieved throughout the litigation; (5) the value of the settlement that Class Counsel have achieved in the cases; and (6) the other cases that Class Counsel have turned down in order to devote their time and efforts to this matter.

10. I am aware that the common and acceptable rate for contingency representation in wage and hour class action litigation is normally 40% before trial, with the range being from 33.3% up to 50%.

11. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the cases such that the award of attorneys' fees is also justified under a simple lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **1,595.20** performing tasks and obtaining a recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and Sherman & Sherman, APC and the time incurred in performing those services. The hours attributable to Lawyers for Justice, PC include work done by myself and several other attorneys at Lawyers for Justice, PC. Additionally, separate from the hours stated herein, Lawyers for Justice, PC also had litigation support personnel actively engaged in assisting with this matter.

12. The work performed in this particular matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour lawsuits, and in particular, employment class actions, support a reasonable hourly rate of compensation at the blended rate of at least \$650 for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$650 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved an hourly rate of \$936.47; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved an hourly rate of \$919.57; final approval of the class action settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of attorneys' fees involved an hourly rate of \$764.82; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v.*

1 *Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was
2 granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

3 **ADEQUACY OF LAWYERS *for* JUSTICE, PC**

4 ***EDUCATION***

5 13. In May of 2004, I graduated from *Pepperdine University School of Law* with a
6 Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from
7 the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree
8 program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles
9 County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from
10 the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard*
11 *University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a
12 concentration in Natural Sciences from *Pepperdine University*.

13 ***JUDICIAL EXTERNSHIPS***

14 14. From approximately September 2002 to approximately December 2002, I served
15 as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of*
16 *Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I
17 served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal*
18 *for the Second Appellate District*.

19 ***LITIGATION AND CLASS ACTION EXPERIENCE***

20 15. In December of 2004, I obtained a license to practice law from the California
21 State Bar. From approximately December 2004 to approximately August 2008, I was employed
22 by *Girardi & Keese*.

23 16. At *Girardi & Keese*, my practice focused on class actions and other complex
24 cases involving toxic torts and products liability. In addition, I gained substantial experience on
25 cases involving insurance bad faith, premises liability, and medical negligence. While employed
26 by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150
27 depositions, and prepared dozens of expert witnesses for deposition or trial.

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17. Since its inception, in or around October of 2008, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

***EXAMPLES OF RESULTS IN WAGE AND HOUR CLASS ACTION AND
REPRESENTATIVE ACTION CASES***

18. What follows are just a few examples of the type of results Lawyers *for* Justice, PC (“LFJ”) has achieved on behalf of its clients:

a) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a major property management company involving allegations of misclassification of various “manager” positions. On September 20, 2010, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC400414.

b) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national retailer of household items involving allegations of misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC413498.

c) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national property management company involving allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court granted final approval of the class action settlement. The Los Angeles County Superior Court

Case Number is BC430918.

d) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national retailer involving allegations of misclassification of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class certification. On August 26, 2013, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC424012.

e) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a bank, involving allegations of misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court granted final approval of the class and PAGA representative action settlement. The Kern County Superior Court Case Number is S-1500-CV-273194-LHB.

f) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a national wholesale distributor of plumbing and builder supplies, involving allegations of misclassification of multiple salaried “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2012-00136285.

g) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class action against a multinational corporation that provides global workplace solutions, involving allegations of misclassification of the “Operations Manager” position. On September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles County Superior Court Case Number is BC478769.

h) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a national retailer of household items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted final approval of the class and PAGA representative action settlement. The San Francisco County Superior Court Case Number is CGC-13-532344.

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1 i) LFJ, in association with co-counsel therein, represented the plaintiff in a
2 wage-and-hour class and PAGA action involving allegations of misclassification of the salaried
3 residential “Property Manager” position. On September 17, 2015, the court granted plaintiff’s
4 motion for class certification. On October 20, 2017, the court granted final approval of the class
5 and PAGA representative action settlement. The Los Angeles County Superior Court Case
6 Number is BC474784.

7 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
8 wage-and-hour class and PAGA representative action against a national retailer of upscale
9 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the
10 court granted final approval of the class and PAGA representative action settlement. The Los
11 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
12 Council Coordination Proceeding Number is 4794.

13 k) LFJ, in association with co-counsel therein, represented the plaintiffs in a
14 wage-and-hour class action against a national retailer of apparel and fashion accessories, on
15 behalf of non-exempt employees. On August 5, 2016, the court granted final approval of the
16 class action settlement. The Los Angeles County Superior Court Case Number is BC488069.

17 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
18 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
19 involving allegations of misclassification of the “Department Manager” position. On August 12,
20 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
21 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
22 County Superior Court Case Number is RG13680477.

23 m) LFJ represented the plaintiff in a PAGA representative action against a
24 real estate and property management company, on behalf of non-exempt employees. On
25 November 4, 2016, the court granted approval of the PAGA representative action settlement. The
26 Orange County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

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1 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of
3 non-exempt employees. On November 18, 2016, the court granted final approval of the class and
4 PAGA representative action settlement. The San Francisco County Superior Court Case Number
5 is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

6 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
7 representative action against a foodservice distributor, on behalf of non-exempt employees. On
8 January 26, 2017, the court granted final approval of the class and PAGA representative action
9 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

10 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
11 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
12 the employer's motion to compel arbitration, which resulted in a published opinion by the
13 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
14 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
15 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
16 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
17 5046.

18 q) LFJ, in association with co-counsel therein, represented the plaintiffs in a
19 wage-and-hour class and PAGA representative action against a consumer packaging company,
20 on behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the
21 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
22 Number is BC590429.

23 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a
24 wage-and-hour class and PAGA representative action against a manufacturer of food service
25 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final
26 approval of the class and PAGA representative action settlement. The Orange County Superior
27 Court Case Number is 30-2015-00810013-CU-OE-CXC.

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1 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a lumber and hardware company
3 on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the
4 class and PAGA representative action settlement. The Orange County Superior Court Case
5 Number is 30-2014-00747750-CU-OE-CXC.

6 t) LFJ represented the plaintiff in a wage-and-hour class and PAGA
7 representative action against a property management company, on behalf of non-exempt
8 employees. On June 14, 2017, the court granted final approval of the class and PAGA
9 representative action settlement. The Los Angeles County Superior Court Case Number is
10 BC586234.

11 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
12 representative action against a food company on behalf of non-exempt employees. On June 30,
13 2017, the court granted final approval of the class and PAGA representative action settlement.
14 The Sacramento County Superior Court Case Number is 34-2015-00175871.

15 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
16 representative action against a chocolate company on behalf of non-exempt employees. On July
17 19, 2017, the court granted final approval of the class and PAGA representative action
18 settlement. The Alameda County Superior Court Case Number is RG15764300.

19 w) LFJ firm represented the plaintiff in a PAGA representative action, against
20 the parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On
21 October 18, 2017, the court granted approval of the PAGA representative action settlement. The
22 Los Angeles County Superior Court Case Number is BC569664.

23 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
24 representative action against a manufacturer of plastic containers on behalf of non-exempt
25 employees. On October 31, 2017, the court granted final approval of the class and PAGA
26 representative action settlement. The Los Angeles County Superior Court Case Number is
27 BC577233.

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1 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
3 employees. On December 11, 2017, the court granted final approval of the class and PAGA
4 representative action settlement. The Los Angeles County Superior Court Case Number is
5 BC569646.

6 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a
7 wage-and-hour class and PAGA representative action against a property management company
8 on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final
9 approval of the class and PAGA representative action settlement. The Los Angeles County
10 Superior Court Case Number is JCCP4819 and the Judicial Council Coordination Proceeding
11 Number is 4819.

12 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
13 wage-and-hour class and PAGA representative action against a global provider of flexible office
14 space solutions. On February 15, 2018, the court granted final approval of the class and PAGA
15 representative action settlement. The Los Angeles County Superior Court Case Number is
16 BC498401.

17 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
18 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
19 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.
20 The Tulare County Superior Court Case Number is VCU264528.

21 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
22 representative action against a behavioral health service provider on behalf of non-exempt
23 employees. On November 13, 2018, the court granted final approval of the class and PAGA
24 representative action settlement. The Alameda County Superior Court Case Number is
25 RG16811450.

26 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 PAGA representative action against a global provider of products and services to the energy
28 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court

1 granted approval of the PAGA representative action settlement. The Kern County Superior
2 Court Case Number is S-1500-CV-280215-SDC.

3 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a
4 wage-and-hour class action against a parking company on behalf of non-exempt employees. On
5 September 3, 2019, the court granted the plaintiff's motion for class certification and certified a
6 class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial
7 Council Coordination Proceeding Number is 4886.

8 ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a
9 wage-and-hour class and representative action against a bank on behalf of non-exempt
10 employees. On September 27, 2019, the court granted the plaintiffs' motion for class
11 certification in part and certified a class. The Alameda County Superior Court Case Number is
12 RG15757606 and the Judicial Council Coordination Proceeding Number is 4921.

13 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a
14 wage-and-hour class and PAGA representative action against a national retailer of apparel and
15 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted
16 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the
17 court granted final approval of the class and PAGA representative action settlement. The
18 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

19 hh) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
20 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
21 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
22 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
23 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
24 approval of the PAGA representative action settlement. The San Diego County Superior Court
25 Case Number is 34-2015-00175330.

26 ii) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class and PAGA representative action against a medical equipment supplier on
28 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion

1 for class certification and certified a class. The San Bernardino County Superior Court Case
2 Number is CIVDS1505744.

3 jj) LFJ, in association with co-counsel therein, represents the plaintiff in a
4 wage-and-hour class and PAGA representative action against a large national drug testing
5 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
6 plaintiff's motion for class certification and certified a class. The San Diego County Superior
7 Court Case Number is 37-2018-00019611-CU-OE-CTL.

8 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
9 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
10 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the
11 court granted in part the plaintiff's motion for class certification and certified a class. The
12 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
13 Judicial Council Coordination Proceeding Number is 4930.

14 ll) LFJ, in association with co-counsel therein, represents the plaintiffs in a
15 wage-and-hour class action against manufacturer and supplier of power products and services on
16 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
17 motion for class certification and certified a class. The San Diego County Superior Court Case
18 Number is 37-2015-00025968-CU-OE-CTL.

19 mm) LFJ represents the plaintiff in a wage-and-hour class action against a
20 nutritional products manufacturer on behalf of non-exempt production line employees. On
21 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
22 certified a class. The Solano County Superior Court Case Number is FCS051001.

23 **LITIGATION COSTS AND EXPENSES INCURRED BY**

24 **LAWYERS FOR JUSTICE, PC**

25 19. To date, Class Counsel has borne all the risks and costs of litigation and will not
26 receive any compensation until recovery is obtained in the cases. Lawyers *for* Justice, PC seeks
27 reimbursement of **\$85,212.56** in litigation costs and expenses incurred in the cases, as reflected
28 in **"EXHIBIT B"** attached hereto. These expenses were reasonable and necessary in the

prosecution of the cases and to obtain the Settlement.

INCENTIVE AWARDS TO PLAINTIFFS

20. In recognition of their efforts and work expended in the cases and serving as the Class Representatives, the Settlement provides for Incentive Awards in the amount of \$10,000.00 each to Plaintiffs Miguel Montoya, Nicholas Lane, LeCostel Williams, and Jose Rosendo Camarillo. The requested Incentive Awards are fair and appropriate. Plaintiffs spent a substantial amount of time and effort in producing relevant documents and information, and provided the facts and evidence necessary to attempt to prove the allegations. For example, Plaintiffs Miguel Montoya and Nicholas Lane expended effort to review and provide responses to multiple sets of discovery requests that were propounded by Defendants and to prepare for and attend deposition, and Plaintiff Miguel Montoya provided information to support the motion for class certification filed in the *Montoya* Action. Plaintiffs were available whenever Class Counsel needed them and actively tried to obtain and provide information that would facilitate the pursuit of the class and PAGA claims. Plaintiffs spent numerous hours speaking with Class Counsel about their claims, describing their work experience with Defendants, and gathering, reviewing, and providing documents. Accordingly, it is appropriate for Plaintiffs Miguel Montoya, Nicholas Lane, LeCostel Williams, and Jose Rosendo Camarillo to each receive \$10,000.00, as reasonable Incentive Awards, for their services on behalf of the Class Members, State of California, and Aggrieved Employees, in addition to their Individual Settlement Payments and/or Individual PAGA Payments.

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


Edwin Aiwanian

EXHIBIT A

MONTOYA V. AMERON INTERNATIONAL CORPORATION, ET AL.
(SAN BERNARDINO COUNTY SUPERIOR COURT CASE NO. CIVDS1718377) (MONTOYA ACTION)
LANE V. AMERON POLE PRODUCTS, LLC, ET AL.
(VENTURA COUNTY SUPERIOR COURT CASE NO. 56-2018-00515902-CU-OE-VTA) (LANE STATE ACTION)
LANE V. AMERON POLE PRODUCTS, LLC, ET AL.
(CENTRAL DISTRICT COURT CASE NO. 2:18-cv-07955-SVW-JC) (LANE FEDERAL ACTION)
LECOSTEL WILLIAMS V. NATIONAL OILWELL VARCO, LP
(KERN COUNTY SUPERIOR COURT CASE NO. BCV-20-102399) (WILLIAMS ACTION)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC	SHERMAN & SHERMAN, APC
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, Including Adequacy, Typicality, Superiority, and Commonality	8.30	5.50
Pre-Lawsuit Investigation of the Merits of Plaintiffs Miguel Montoya, Nicholas Lane, Jose Rosendo Camarillo, and LeCostel Williams's (together, "Plaintiffs") Claims and the Merits of the Claims of the Putative Class Members	9.50	7.50
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendants Ameron International Corporation, Ameron Water Transmission Group, LLC, Ameron Pole Products LLC, NOV Process & Flow Technology, Inc., Containment Solutions, Inc., Containment Solutions Services, Inc., National Oilwell Varco, LP, NOV, Inc., and/or NOW Oilfield Services, LLC (collectively, "Defendants") with Respect to the Damages Sustained by Plaintiffs and the Putative Class Members	8.60	6.20
Pre-Notice Investigation of the Key Facts with a Focus on the Merits of the Private Attorneys General Act ("PAGA") Claim on Behalf of the State of California With Respect to Plaintiff Jose Rosendo Camarillo and the Aggrieved Employees	8.20	0

Pre-Notice Investigation of Potential Civil Penalties Exposure of Defendants with Respect to Alleged Labor Code and IWC Wage Order Violations with Respect to Plaintiff Jose Rosendo Camarillo and the Aggrieved Employees	9.10	0
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, Joint Employer/Joint Enterprise/Alter Ego, Collective Bargaining Agreement, <i>Pick Up Stix</i> /Settlement/Release, and Certification Decisions in California, Including all New and Relevant DLSE Materials	9.10	5.80
Investigation of Defendants, Defendants' Business Relationships and Affiliates, and the Industry in which Defendants Operate	6.50	2.50
Investigation of Defendants' Organizational and Corporate Structure, and Executive Reporting Structure as They Relate to the Employment and Management of the Putative Class Members	6.80	2.10
Investigation of Defendants' Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	4.50	1.90
Analysis of Competitors in Various Relevant Geographic Areas within which Defendants Operate, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendants' Competitors	4.90	0
Research and Investigation Re: Locations(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendants in California During the Class Period, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	7.80	2.60
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations at Which Putative Class Members Worked Throughout California	7.50	1.80

Research and Investigation Re: Defendants' Policies, Practices, and Procedures Relating to Timekeeping, Scheduling, Days Off, Meal/Rest Breaks, Automatic Meal Deduction, On-Premises Meal and Rest Breaks, Non-Discretionary Bonus/Incentive/Performance/Production/Commission/Shift Differential Pay, Overtime Compensation, Reporting Time Wages, Vacation/Sick/PTO Pay, Uniform Rental/Maintenance/Replacement Costs, Equipment, Reimbursement of Business-Related Expenses, Collective Bargaining Agreements, Alternative Dispute Resolution Terms and Procedures, and <i>Pick Up Stix</i> /Release Agreements	20.50	13.50
Research and Investigation Re: Various Software Programs and Other Technology Defendants Use to Conduct Everyday Business, Including Timekeeping, Inventory, Project Management, Logistics, GPS, Communications, and Security/Safety Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	5.80	2.30
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	7.50	5.90
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	5.70	2.10
Research and Analysis of Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	2.50	1.60
Meet and Communicate with Plaintiff Miguel Montoya Throughout the Pendency of the Case	33.50	1.50
Meet and Communicate with Plaintiff Nicholas Lane Throughout the Pendency of the Case	31.50	0

Meet and Communicate with Plaintiff Jose Rosendo Camarillo Throughout the Pendency of the Case	30.50	0
Meet and Communicate with Plaintiff LeCostel Williams Throughout the Pendency of the Case	5.50	32.80
Investigate, Meet and Communicate with, and/or Conduct Interviews of Putative Class Members and Percipient Witnesses	22.50	10.50
Research and Draft Plaintiff Montoya's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on September 20, 2017) (Montoya Action)	6.50	0
Review Court's Notice of Case Assignment and Notice of Trial Setting Conference (filed on September 20, 2017) (Montoya Action)	0.10	0
Review and Analyze Defendant Ameron International Corporation's Answer to Plaintiff Montoya's Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (served on February 13, 2018) (Montoya Action)	1.70	0
Draft, Revise, and/or Review Plaintiff Montoya's At-Issue Memorandum (filed on March 6, 2018) (Montoya Action)	1.50	0
Draft, Revise, and/or Review Plaintiff Montoya's Amendment to Complaint (filed on June 1, 2018) (Montoya Action)	0.50	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Answer to Plaintiff Montoya's Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (served on July 5, 2018) (Montoya Action)	1.50	0
Review Court's Notice of Case Assignment and Notice of Case Management Conference (filed on July 6, 2018) (Montoya Action)	0.10	0

Research and Draft Plaintiff Lane's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on August 6, 2018) (Lane State Action)	7.80	0
Review Court's Notice of Case Assignment and Mandatory Appearance Conference (filed on August 6, 2018) (Lane State Action)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Case Management Statement (submitted on August 15, 2018) (Montoya Action)	1.60	0
Review Court's Minute Order Re: Case Management Conference (filed on August 20, 2018) (Montoya Action)	0.20	0
Review Court's Certificate Re: Disqualification of Judge (filed on September 12, 2018) (Lane State Action)	0.20	0
Review and Analyze Defendant Ameron Pole Products, LLC's Answer to Plaintiff Lane's Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (served on September 12, 2018) (Lane State Action)	1.80	0
Review Defendant Ameron Pole Products, LLC's Notice of Removal of Civil Action from State Court to Federal Court Pursuant to 28 U.S.C. §§ 1331 and 1441, Exhibits A-C, Declaration of Susan McLain in Support Thereof, Certification of Interested Parties in Compliance with Local Rule 7.1, and Corporate Disclosures Statement Pursuant to FRCP 7.1 (served on September 13, 2018) (Lane Federal Action)	1.50	0
Review Defendant Ameron Pole Products, LLC's Notice of Related Cases (served on September 13, 2018) (Lane Federal Action)	0.20	0
Review Court's Notice of Assignment to United States Judges (filed on September 14, 2018) (Lane Federal Action)	0.10	0

Review and Analyze Defendant Ameron Pole Products, LLC's Notice to Superior Court and to Plaintiff of Removal of Action to United States District Court (served on September 14, 2018) (Lane State Action)	0.30	0
Review Court's New Case Order and Order Setting Initial Status Conference (filed on September 19, 2018) (Lane Federal Action)	0.30	0
Review Court's Notice of Reassignment of Judicial Officer and Change of Hearing Location (filed on October 1, 2018) (Lane State Action)	0.10	0
Review Court's Notice Continuing Initial Status Conference (Filed on October 5, 2018) (Lane Federal Action)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Updated Joint Case Management Statement (submitted on October 12, 2018) (Montoya Action)	1.60	0
Draft Plaintiff Lane's Certification and Notice of Interested Parties (filed on October 15, 2018) (Lane Federal Action)	0.10	0
Review Court's Minute Order Re: Case Management Conference (filed on October 18, 2018) (Montoya Action)	0.10	0
Review Court's Scheduling Notice Re: Initial Status Conference (filed on November 1, 2018) (Lane Federal Action)	0.10	0
Draft Plaintiff Lane's Notice of Lodging of United States District Court's Order Granting Plaintiff's Motion to Remand and Letter of Transmittal (filed on November 13, 2018) (Lane State Action)	0.30	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's First Amended Answer to Plaintiff Montoya's Class Action Complaint for Damages and Research	1.30	0

Affirmative Defenses in Defendants' Answer (served on November 19, 2018) (Montoya Action)		
Draft Plaintiff Lane's Amendment to Complaint (filed on November 27, 2018) (Lane State Action)	0.20	0
Review Court's Order to Show Cause (filed on December 4, 2018) (Lane State Action)	0.10	0
Review and Analyze Defendant Ameron Pole Products, LLC's First Amended Answer to Plaintiff Lane's Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (served on January 3, 2019) (Lane State Action)	1.50	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Updated Joint Case Management Statement (submitted on January 11, 2019) (Montoya Action)	1.10	0
Draft Plaintiff Lane's Notice and Acknowledgment of Receipt (filed on January 29, 2019) (Lane State Action)	0.20	0
Review Court's Minute Order Re: Order to Show Cause Re: Sanctions (filed on January 30, 2019) (Lane State Action)	0.10	0
Review and Analyze Defendants' Answer to Plaintiff Lane's Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (served on February 13, 2019) (Lane State Action)	1.60	0
Draft Plaintiff Lane's Notice Re: Orders Made at January 30, 2019 OSC Hearing (filed on February 14, 2019) (Lane State Action)	0.30	0
Draft, Revise, and/or Review Plaintiff Montoya's Case Management Statement (filed on March 1, 2019) (Montoya Action)	1.40	0

Review Defendant Ameron Water Transmission Group, LLC's Case Management Statement (served on March 6, 2019) (Montoya Action)	0.70	0
Review Court's Minute Order Re: Class Action Case Designation (filed on March 13, 2019) (Lane State Action)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Stipulation Re: Discovery (submitted on March 20, 2019) (Montoya Action)	1.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Case Management Statement (submitted on March 22, 2019) (Lane State Action)	1.50	0
Review Court's Order Re: Stipulation Re: Discovery (filed on April 3, 2019) (Montoya Action)	0.20	0
Review Court's Minute Order Re: Case Management Conference/ Oder to Show Cause (filed on April 5, 2019) (Lane State Action)	0.10	0
Review Court's Minute Order Re: Status Conference (filed on April 22, 2019) (Lane State Action)	0.10	0
Draft Plaintiff Lane's Notice of Ruling Relating to April 22, 2019 Case Management Conference (filed on April 24, 2019) (Lane State Action)	0.20	0
Review Court's Minute Order Re: Informal Discovery Conference (filed on May 2, 2019) (Montoya Action)	0.10	0
Review Court's Minute Order Re: Mandatory Appearance Case Management Conference (filed on May 6, 2019) (Lane State Action)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Case Management Statement (submitted on June 10, 2019) (Lane State Action)	1.50	0

Review Court's Minute Order Re: Status Conference (filed on June 24, 2019) (Lane State Action)	0.10	0
Review Court's Minute Order Re: Case Management Conference (filed on June 28, 2019) (Montoya Action)	0.10	0
Review Court's Notice of Change of Track Assignment (filed on July 11, 2019) (Lane State Action)	0.10	0
Draft Plaintiff Lane's Notice of Posting Complex Fees (filed on July 12, 2019) (Lane State Action)	0.20	0
Review Defendants' Notice of Posting Complex Fees (filed on July 17, 2019) (Lane State Action)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Stipulation and Protective Order (submitted on August 7, 2019) (Montoya Action)	1.90	0
Review Defendant Ameron International Corporation's Substitution of Attorney (served on August 29, 2019) (Montoya Action)	0.10	0
Review Defendant Ameron International Corporation's Substitution of Attorney (served on August 29, 2019) (Lane State Action)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Case Management Statement (submitted on August 30, 2019) (Lane State Action)	1.50	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Stipulation to Continue September 6, 2019 Case Management Conference; [Proposed] Order (submitted on August 30, 2019) (Lane State Action)	1.10	0

Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Case Management Statement (submitted on October 4, 2019) (Lane State Action)	1.60	0
Review Court's Minute Order Re: Status Conference (filed on October 9, 2019) (Lane State Action)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Case Management Statement (submitted on October 21, 2019) (Montoya Action)	1.60	0
Review Court's Notice of Continuance Re: Case Management Conference (filed on October 30, 2019) (Montoya Action)	0.10	0
Review Court's Order Continuing Status Conference Hearing (filed on December 16, 2019) (Lane State Action)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Case Management Statement (submitted on December 18, 2019) (Montoya Action)	1.60	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Stipulation and [Proposed] Order to Continue Status Conference Hearing (submitted on February 4, 2020) (Lane State Action)	1.10	0
Review Court's Order to Continue Status Conference Hearing (filed on February 10, 2020) (Lane State Action)	0.20	0
Draft Plaintiff Montoya's Notice of Disassociation of Counsel (filed on March 3, 2020) (Montoya Action)	0.20	0
Review Court's Minute Order Re: Status Conference (filed on March 4, 2020) (Montoya Action)	0.10	0

Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Case Management Statement (submitted on March 11, 2020) (Montoya Action)	1.10	0
Review Court's Notice of Status Conference (filed on June 11, 2020) (Lane State Action)	0.10	0
Review Defendants' Status Conference Statement (served on August 3, 2020) (Lane State Action)	0.20	0
Review Court's Minute Order Re: Status Conference (filed on August 17, 2020) (Lane State Action)	0.10	0
Draft Plaintiff Montoya's Notice of Association of Counsel (filed on September 17, 2020) (Montoya Action)	0.20	0.10
Review Plaintiff Williams' Class Action Complaint for Damages (filed on October 13, 2020) (Williams Action)	0	7.50
Review Court's Minute Order Re: Case Reassignment (filed on November 20, 2020) (Lane State Action)	0.10	0
Review and Analyze Defendant National Oilwell Varco, LP.'s, NOV Process & Flow Technologies, Inc.'s and NOV Process & Flow Technologies, US, Inc.'s Answer to Plaintiff Williams' Class Action Complaint for Damages and Research Affirmative Defenses in Defendants' Answer (served on November 30, 2020) (Williams Action)	0	2.30
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Case Management Statement (submitted on December 1, 2020) (Lane State Action)	1.50	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Stipulation for Order Continuing Class Certification Hearing and Attendant Deadlines; [Proposed] Order (submitted on December 10, 2020) (Montoya Action)	1.30	0.20

Review Court's Minute Order Re: Status Conference (filed on December 14, 2020) (Lane State Action)	0.10	0
Review Court's Order Continuing Class Certification Hearing and Attendant Deadlines (filed on December 18, 2020) (Montoya Action)	0.20	0.10
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Stipulation for Order Continuing Class Certification Hearing and Attendant Deadlines; [Proposed] Order (submitted on February 22, 2020) (Montoya Action)	1.40	0.10
Review Court's Order Continuing Class Certification Hearing and Attendant Deadlines (filed on March 24, 2021) (Montoya Action)	0.20	0.10
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Stipulation to Continue Status Conference (submitted on May 18, 2021) (Lane State Action)	1.10	0
Review Court's Order to Continue Status Conference (filed on May 27, 2021) (Lane State Action)	0.10	0
Review Defendants' Substitution of Attorney (served on July 21, 2021) (Montoya Action)	0.10	0.10
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Case Management Statement (submitted on August 6, 2021) (Lane State Action)	1.60	0
Review Court's Minute Order Re: Status Conference (filed on August 9, 2021) (Lane State Action)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Stipulation and [Proposed] Protective Order (submitted on September 28, 2021) (Lane State Action)	1.80	0

Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Case Management Conference Statement (submitted on October 1, 2021) (Lane State Action)	1.10	0
Review Court's Minute Order Re: Status Conference (filed on October 4, 2021) (Lane State Action)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Notice of Settlement and Stipulation Vacating the Motion for Class Certification; [Proposed] Order (submitted on October 5, 2021) (Montoya Action)	1.30	0.20
Review Court's Order Vacating the Motion for Class Certification (filed on October 6, 2021) (Montoya Action)	0.10	0.10
Review Court's Protective Order (submitted on October 13, 2021) (Lane State Action)	0.20	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Notice of Settlement (submitted on November 2, 2021) (Lane State Action)	0.40	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Notice of Settlement (submitted on November 4, 2021) (Williams Action)	0	0.50
Review Notice of Lien for Attorneys' Fees and Costs (served on November 18, 2021) (Montoya Action)	0.10	0.20
Review Court's Minute Order Re: Status Conference (December 6, 2021) (Lane State Action)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Further Case Management Conference Statement (submitted on December 7, 2021) (Montoya Action)	1.10	0.20

Review Court's Order Continuing Case Management Conference (Submitted on December 7, 2021) (Lane State Action)	0.10	0
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Stipulation Regarding January 5, 2022 Order to Show Cause Regarding Dismissal (served on January 4, 2022) (Williams Action)	0	1.10
Review Court's Order Granting Stipulation Regarding January 5, 2022 Order to Show Cause Regarding Dismissal (served on January 5, 2022) (Williams Action)	0	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Plaintiff Montoya's (filed on February 16, 2022) (Montoya Action)	1.10	0.10
Review Court's Order to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (filed on March 14, 2022) (Montoya Action)	0.10	0.10
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on March 18, 2022) (Lane State Action)	1.30	0
Review Court's Order to Continue Case Management Conference (filed on March 25, 2022) (Lane State Action)	0.10	0
Review Court's Order to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (filed on April 5, 2022) (Montoya Action)	0.10	0.10
Review Notice of Lien for Attorneys' Fees and Costs (served on May 3, 2022) (Montoya Action)	0.10	0.20

Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Stipulation to Continue Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval; [Proposed] Order Thereon (submitted on May 5, 2022) (Montoya Action)	0.90	0.20
Review Court's Order Continuing Plaintiff's Hearing and Deadline to File Motion for Preliminary Approval (filed on May 11, 2022) (Montoya Action)	0.10	0.10
Meet and Confer with Defendants' Counsel, and Draft, Revise, and/or Review Joint Stipulation to Continue Case Management Conference; [Proposed] Order (Submitted on June 16, 2022) (Lane State Action)	1.20	0
Review Court's Order Continuing Case Management Conference (filed on June 23, 2022) (Lane State Action)	0.10	0
Research and Draft, Revise, and/or Review Plaintiffs' First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on July 1, 2022) (Montoya Action)	5.10	0.50
Prepare for, Travel to/from, and Attend Hearing on Defendants' Demurrer and Motion for Sanctions (January 24, 2018) (Montoya Action)	5.50	0
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion to Compel Further Responses to Special Interrogatories (Set One) Nos. 1 and 2 (March 12, 2018) (Montoya Action) (Montoya Action)	4.10	0
Prepare for, Travel to/from, and Attend Hearing on Defendants' Motion for Summary Judgment, Motion for Sanctions, and Trial Setting Conference (June 20, 2018) (Montoya Action)	5.90	0

Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion to Enforce Order Granting Motion to Compel and Request for Sanctions (June 27, 2018) (Montoya Action)	4.10	0
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion to Compel (July 18, 2018) (Montoya Action)	5.50	0
Prepare for, Travel to/from, and Attend Informal Discovery Conference, Case Management Conference, and Plaintiff's Demurrer and Motion to Strike Defendant Ameron Water Transmission Group, LLC's Answer to Plaintiff's Complaint (October 18, 2018) (Montoya Action)	7.80	0
Prepare for, Travel to/from, and Attend Hearing on Motions to Compel Further Responses to Plaintiffs' Special Interrogatories (Sets Two and Three) and Requests for Production of Documents (Sets One and Two) (January 23, 2019) (Montoya Action)	11.70	0
Prepare for, Travel to/from, and Attend Case Management Conference (March 8, 2019) (Montoya Action)	4.50	0
Prepare for, Travel to/from, and Attend Informal Discovery Conference (March 20, 2019)	5.50	0
Prepare for, Travel to/from, and Attend Informal Discovery Conference (May 2, 2019) (Montoya Action)	5.10	0
Prepare for and Telephonically Attend Case Management Conference (December 6, 2021) (Lane State Action)	1.50	0
Prepare for and Telephonically Attend Case Management Conference (December 14, 2021) (Montoya Action)	2.10	0
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (July 1, 2022) (Montoya Action)	2.50	1.50

Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Incentive Awards (November 8, 2022) (Anticipated) (Montoya Action)	2.10	1.50
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Miguel Montoya (served on March 28, 2017)	1.90	0
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Miguel Montoya (served on April 5, 2017)	1.90	0
Draft Follow-Up Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Miguel Montoya (served on May 3, 2017)	2.10	0
Draft Follow-Up Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Miguel Montoya (served on May 22, 2017)	2.30	0
Draft Plaintiff Montoya's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Document (Set One) to Defendant Ameron International Corporation (served on November 21, 2017) (Montoya Action)	7.10	0
Draft Plaintiff Montoya's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron International Corporation and Requests for Production of Documents (December 20, 2017; Organizational Structure) (served on November 21, 2017) (Montoya Action)	3.60	0
Draft Plaintiff Montoya's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron International Corporation and Requests for Production of Documents (December 21, 2017; Wage and Hour Practices) (served on November 21, 2017) (Montoya Action)	3.80	0
Review and Analyze Defendant Ameron International Corporation's Objections to Plaintiff Montoya's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron	1.20	0

International Corporation and Requests for Production of Documents (December 20, 2017; Organizational Structure) (served on December 14, 2017) (Montoya Action)		
Review and Analyze Defendant Ameron International Corporation's Objections to Plaintiff Montoya's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron International Corporation and Requests for Production of Documents (December 21, 2017; Wage and Hour Practices) (served on December 14, 2017) (Montoya Action)	1.40	0
Review and Analyze Defendant Ameron International Corporation's Response to Plaintiff Montoya's Special Interrogatories (Set One) (served on December 26, 2017) (Montoya Action)	0.90	0
Review Defendant Ameron International Corporation's Notice of Deposition of Plaintiff Miguel Montoya (served on February 13, 2018) (Montoya Action)	0.50	0
Draft Plaintiff Montoya's Objection to Notice of Deposition of Plaintiff Miguel Montoya (served on March 19, 2018) (Montoya Action)	0.80	0
Draft Plaintiff's Special Interrogatories (Set Three) and Requests for Production of Document (Set Two) to Defendant Ameron International Corporation (served on March 19, 2018) (Montoya Action)	4.10	0
Draft Plaintiff Montoya's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron International Corporation and Requests for Production of Documents (April 23, 2018; Affirmative Defenses) (served on March 19, 2018) (Montoya Action)	3.90	0
Review and Analyze Defendant Ameron International Corporation's Responses to Plaintiff Montoya's Form Interrogatories - General (Set One), Special Interrogatories (Set Two), and Requests for Production of Document (Set One) to Defendant Ameron International Corporation (served on April 5, 2018) (Montoya Action)	2.80	0

Review and Analyze Defendant Ameron International Corporation's Supplemental Response to Plaintiff Montoya's Special Interrogatories (Set One) to Defendant Ameron International Corporation (served on April 11, 2018) (Montoya Action)	0.80	0
Draft Plaintiff Montoya's Notice of Deposition of Debbie Perez (served on April 11, 2018) (Montoya Action)	0.70	0
Review Defendant Ameron International Corporation's Objection to Plaintiff Montoya's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron International Corporation and Requests for Production of Documents (April 23, 2018; Affirmative Defenses) (served on April 18, 2018) (Montoya Action)	1.80	0
Review Defendant Ameron International Corporation's Objection to Plaintiff Montoya's Notice of Deposition of Debbie Perez (served on April 27, 2018) (Montoya Action)	0.50	0
Review and Analyze Defendant Ameron International Corporation's Objections to Plaintiff Montoya's Special Interrogatories (Set Three) and Requests for Production of Document (Set Two) to Defendant Ameron International Corporation (served on May 4, 2018) (Montoya Action)	3.10	0
Review and Analyze Documents Produced by Defendants (served on May 4, 2018) (Montoya Action)	2.90	0
Draft Plaintiff Montoya's Re-Notice of Deposition of Debbie Perez (served on May 24, 2018) (Montoya Action)	0.70	0
Draft Plaintiff Montoya's Second Re-Notice of Deposition of Debbie Perez (served on May 29, 2018) (Montoya Action)	0.70	0
Prepare for, Travel to/from, and Take the Deposition of Debbie Perez (May 31, 2018; Glendale, California) and Review Deposition Transcript	12.10	0

Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Nicholas Lane (served on June 20, 2018)	1.90	0
Draft Plaintiff Montoya's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Document (Set One) to Defendant Ameron Water Transmission Group, LLC (served on July 6, 2018) (Montoya Action)	6.10	0
Review and Analyze Defendant Ameron International Corporation's Amended Supplemental Response to Plaintiff Montoya's Special Interrogatories (Set One) to Defendant Ameron International Corporation (served on July 9, 2018)	0.50	0
Draft Plaintiff Montoya's Special Interrogatories (Set Three) and Requests for Production of Document (Set Two) to Defendant Ameron Water Transmission Group, LLC (served on July 17, 2018) (Montoya Action)	2.80	0
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Nicholas Lane (served on July 17, 2018)	1.60	0
Draft Plaintiff Montoya's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Water Transmission Group, LLC and Requests for Production of Documents (August 20, 2018; Affirmative Defenses) (served on July 17, 2018) (Montoya Action)	2.70	0
Draft Plaintiff Montoya's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron International Corporation and Requests for Production of Documents (August 20, 2018; Organizational Structure) (served on July 18, 2018) (Montoya Action)	1.20	0
Draft Plaintiff Montoya's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron International Corporation and Requests for Production of Documents (August 21, 2018; Wage and Hour Practices) (served on July 18, 2018) (Montoya Action)	1.40	0

Draft Plaintiff Montoya's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Water Transmission Group, LLC and Requests for Production of Documents (August 13, 2018; Wage and Hour Practices) (served on July 30, 2018) (Montoya Action)	2.50	0
Review and Analyze Defendant Ameron International Corporation's Amended Response to Plaintiff Montoya's Special Interrogatories (Set Three) and Requests for Production of Document (Set Two) to Defendant Ameron International Corporation (served on August 1, 2018) (Montoya Action)	3.50	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Objection to Plaintiff Montoya's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Water Transmission Group, LLC and Requests for Production of Documents (August 13, 2018; Wage and Hour Practices) (served on August 10, 2018) (Montoya Action)	2.50	0
Review and Analyze Defendant Ameron International Corporation's Supplemental Response to Plaintiff Montoya's Form Interrogatories - General (Set One), Special Interrogatories (Set Two), and Requests for Production of Document (Set One) to Defendant Ameron International Corporation (served on August 15, 2018) (Montoya Action)	1.90	0
Review and Analyze Defendant Ameron International Corporation's Objection to Plaintiff Montoya's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron International Corporation and Requests for Production of Documents (August 20, 2018; Affirmative Defenses) (served on August 15, 2018) (Montoya Action)	1.30	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Objection to Plaintiff Montoya's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Water Transmission Group, LLC and Requests for Production of Documents (August 20, 2018; Affirmative Defenses) (served on August 15, 2018) (Montoya Action)	2.10	0
Review and Analyze Defendant Ameron International Corporation's Objection to Plaintiff Montoya's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron	1.90	0

International Corporation and Requests for Production of Documents (August 21, 2018; Wage and Hour Practices) (served on August 16, 2018) (Montoya Action)		
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Plaintiff Montoya's Special Interrogatories (Set Three) and Requests for Production of Document (Set Two) to Defendant Ameron Water Transmission Group, LLC (served on August 20, 2018) (Montoya Action)	2.80	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Objections to Plaintiff Montoya's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Document (Set One) to Defendant Ameron International Corporation (served on August 15, 2018) (Montoya Action)	3.70	0
Draft Plaintiff Lane's Notice of Rule 30(b)(6) Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (November 26, 2018; Organizational Structure) (served on October 16, 2018) (Lane Federal Action)	1.50	0
Draft Plaintiff Lane's Notice of Rule 30(b)(6) Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (November 27, 2018; Wage and Hour Practices) (served on October 16, 2018) (Lane Federal Action)	1.70	0
Draft Plaintiff Lane's Notice of Rule 30(b)(6) Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, Inc. dba Nov Ameron and Request for Productions of Documents (November 28, 2018; Organizational Structure) (served on October 16, 2018) (Lane Federal Action)	1.30	0
Draft Plaintiff Lane's Notice of Rule 30(b)(6) Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, Inc. dba Nov Ameron and Request for Productions of	1.50	0

Documents (November 29, 2018; Wage and Hour Practices) (served on October 16, 2018) (Lane Federal Action)		
Draft Plaintiff Lane's Interrogatories (Set One) and Request for Production of Documents (Set One to Defendant Ameron Pole Products, LLC (served on October 16, 2018) (Lane Federal Action)	2.80	0
Draft Plaintiff Lane's Interrogatories (Set One) and Request for Production of Documents (Set One to Defendant National Oilwell Varco, Inc. dba Nov Ameron (served on October 16, 2018) (Lane Federal Action)	2.10	0
Draft Plaintiff Lane's Notice of Deposition of Louis Farrar (served on November 5, 2018) (Lane Federal Action)	0.90	0
Draft Plaintiff Lane's Notice of Deposition of Susan McLain (served on November 5, 2018) (Lane Federal Action)	0.90	0
Review and Analyze Defendant Ameron Pole Products, LLC's Responses to Plaintiff Lane's Interrogatories (Set One) and Request for Production of Documents (Set One) to Defendant Ameron Pole Products, LLC (served on November 19, 2018) (Lane State Action)	4.50	0
Draft Plaintiff Lane's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Ameron Pole Products, LLC (served on November 20, 2018) (Lane State Action)	2.50	0
Draft Plaintiff Lane's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant National Oilwell Varco, Inc. dba Nov Ameron (served on November 20, 2018) (Lane State Action)	2.10	0

Draft Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (December 26, 2018; Organizational Structure) (served on November 20, 2018) (Lane State Action)	1.50	0
Draft Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (December 27, 2018; Wage and Hour Practices) (served on November 20, 2018) (Lane State Action)	1.70	0
Draft Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, Inc. dba Nov Ameron and Request for Productions of Documents (January 2, 2019; Organizational Structure) (served on November 20, 2018) (Lane State Action)	1.30	0
Draft Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, Inc. dba Nov Ameron and Request for Productions of Documents (January 3, 2019; Wage and Hour Practices) (served on November 20, 2018) (Lane State Action)	1.50	0
Review and Analyze Defendant National Oilwell Varco, Inc. dba Nov Ameron's Objection to Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, Inc. dba Nov Ameron and Request for Productions of Documents (November 28, 2018; Organizational Structure) (served on November 21, 2018) (Lane State Action)	1.50	0
Review and Analyze Defendant National Oilwell Varco, Inc. dba Nov Ameron's Objection to Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, Inc. dba Nov Ameron and Request for Productions of Documents (November 29, 2018; Wage and Hour Practices) (served on November 21, 2018) (Lane State Action)	1.80	0

Review Defendant Ameron Pole Products, LLC's Objection to Plaintiff Lane's Notice of Deposition of Louis Farrar (served on November 29, 2018) (Lane State Action)	0.50	0
Review Defendant Ameron Pole Products, LLC's Objection to Plaintiff Lane's Notice of Deposition of Susan McLain (served on November 29, 2018) (Lane State Action)	0.50	0
Review and Analyze Defendant Ameron Pole Products, LLC's Objection to Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (December 26, 2018; Organizational Structure) (served on December 20, 2018) (Lane State Action)	1.30	0
Review and Analyze Defendant Ameron Pole Products, LLC's Objection to Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (December 27, 2018; Wage and Hour Practices) (served on December 20, 2018) (Lane State Action)	2.00	0
Review and Analyze Defendant National Oilwell Varco, Inc. dba Nov Ameron's Objection to Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, Inc. dba Nov Ameron and Request for Productions of Documents (January 2, 2019; Organizational Structure) (served on December 27, 2018) (Lane State Action)	1.30	0
Review and Analyze Defendant National Oilwell Varco, Inc. dba Nov Ameron's Objection to Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, Inc. dba Nov Ameron and Request for Productions of Documents (January 3, 2019; Wage and Hour Practices) (served on December 27, 2018) (Lane State Action)	2.30	0
Review and Analyze Defendant National Oilwell Varco, Inc. dba Nov Ameron's Responses to Draft Plaintiff Lane's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents	4.80	0

(Set One) to Defendant National Oilwell Varco, Inc. dba Nov Ameron (served on January 22, 2019) (Lane State Action)		
Draft Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, LP dba Nov Ameron and Request for Productions of Documents (March 19, 2019; Organizational Structure) (served on January 29, 2019) (Lane State Action)	1.40	0
Draft Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, LP dba Nov Ameron and Request for Productions of Documents (March 20, 2019; Wage and Hour Practices) (served on January 29, 2019) (Lane State Action)	1.60	0
Draft Plaintiff Lane's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant National Oilwell Varco, LP dba Nov Ameron (served on January 29, 2019) (Lane State Action)	6.50	0
Review and Analyze Defendant Ameron Pole Products, LLC's Responses to Plaintiff Lane's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Document (Set One) to Defendant Ameron Pole Products, LLC (served on February 5, 2019) (Lane State Action)	4.50	0
Review and Analyze Defendant Ameron International Corporation's Further Supplemental Response to Plaintiff Montoya's Special Interrogatories (Set Two) to Defendant Ameron International Corporation (served on February 22, 2019) (Montoya Action)	1.50	0
Review and Analyze Defendant Ameron International Corporation's Supplemental Response to Plaintiff Montoya's Special Interrogatories (Set Three), Requests for Production of Document (Set One), and Requests for Production of Document (Set Two) to Defendant Ameron International Corporation (served on February 22, 2019) (Montoya Action)	3.10	0

Draft Plaintiff Lane's Special Interrogatories (Set Three) and Request for Production of Documents (Set Two) to Defendant Ameron Pole Products, LLC (served on February 26, 2019) (Lane State Action)	2.60	0
Draft Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, Inc. dba Nov Ameron and Request for Productions of Documents (March 25, 2019; Affirmative Defenses) (served on February 26, 2019) (Lane State Action)	2.50	0
Review and Analyze Defendant National Oilwell Varco, LP dba Nov Ameron's Responses to Draft Plaintiff Lane's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant National Oilwell Varco, LP dba Nov Ameron (served on March 4, 2019) (Lane State Action)	3.50	0
Draft Plaintiff Lane's Special Interrogatories (Set Three) and Request for Production of Documents (Set Two) to Defendant National Oilwell Varco, Inc. dba Nov Ameron (served on March 7, 2019) (Lane State Action)	2.20	0
Draft Plaintiff Lane's Special Interrogatories (Set Three) and Request for Production of Documents (Set Two) to Defendant National Oilwell Varco, LP dba Nov Ameron (served on March 7, 2019) (Lane State Action)	1.90	0
Draft Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, Inc. dba Nov Ameron and Request for Productions of Documents (April 9, 2019; Affirmative Defenses) (served on March 7, 2019) (Lane State Action)	1.40	0
Draft Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant National Oilwell Varco, Inc. dba Nov Ameron and Request for Productions of Documents (April 10, 2019; Affirmative Defenses) (served on March 7, 2019) (Lane State Action)	1.20	0
Review and Analyze Defendant National Oilwell Varco, Inc. dba Nov Ameron's Objection to Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant	1.80	0

National Oilwell Varco, Inc. dba Nov Ameron and Request for Productions of Documents (March 20, 2019; Wage and Hour Practices) (served on March 15, 2019) (Lane State Action)		
Review and Analyze Defendant Ameron Pole Products, LLC's Objection to Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (March 19, 2019; Organizational Structure) (served on March 15, 2019) (Lane State Action)	1.30	0
Review and Analyze Defendant Ameron Pole Products, LLC's Objection to Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (March 20, 2019; Wage and Hour Practices) (served on March 22, 2019) (Lane State Action)	1.90	0
Review and Analyze Defendant Ameron Pole Products, LLC's Response to Plaintiff Lane's Special Interrogatories (Set Three) and Request for Production of Documents (Set Two) (served on April 2, 2019) (Lane State Action)	3.80	0
Review and Analyze Defendant Ameron Pole Products, LLC's Objection to Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (April 9, 2019; Affirmative Defenses) (served on April 5, 2019) (Lane State Action)	1.90	0
Review and Analyze Defendant Ameron Pole Products, LLC's R to Plaintiff Lane's Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (April 10, 2019; Affirmative Defenses) (served on April 5, 2019) (Lane State Action)	1.70	0
Review and Analyze Defendant National Oilwell Varco, Inc. dba Nov Ameron's Response to Plaintiff Lane's Special Interrogatories (Set Three) and Request for Production of Documents (Set Two) to Defendant National Oilwell Varco, Inc. dba Nov Ameron (served on April 9, 2019) (Lane State Action)	3.90	0

Review and Analyze Defendant National Oilwell Varco, LP dba Nov Ameron's Response Plaintiff Lane's Special Interrogatories (Set Three) and Request for Production of Documents (Set Two) to Defendant National Oilwell Varco, LP dba Nov Ameron (served on April 9, 2019) (Lane State Action)	3.40	0
Draft Letter to Defendant Ameron Pole Products, LLC and National Oilwell Varco, Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff LeCostel Williams (served on June 26, 2019)	1.90	0
Review and Analyze Defendant Ameron Pole Products, LLC's Responses to Plaintiff Lane's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant Ameron Pole Products, LLC (served on July 5, 2019) (Lane State Action)	5.90	0
Draft Plaintiff Montoya's Second Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron International Corporation and Requests for Production of Documents (July 19, 2019; Wage and Hour Practices) (served on July 5, 2019) (Montoya Action)	1.10	0
Draft Plaintiff Montoya's Second Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron International Corporation and Requests for Production of Documents (July 25, 2019; Organizational Structure) (served on July 10, 2019) (Montoya Action)	0.90	0
Draft Plaintiff Montoya's Second Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Water Transmission Group, LLC and Requests for Production of Documents (July 25, 2019; Organizational Structure) (served on July 10, 2019) (Montoya State Action)	0.90	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Response to Plaintiff Montoya's Special Interrogatories (Set Three) to Defendant Ameron International Corporation (served on July 19, 2019) (Montoya Action)	1.30	0

Review and Analyze Defendant Ameron Water Transmission Group, LLC's Objections to Plaintiff Montoya's Requests for Production of Document (Set One) to Defendant Ameron International Corporation (served on July 19, 2019) (Montoya Action)	1.50	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Supplemental Response to Plaintiff Montoya's Form Interrogatories-General (Set one), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Document (Set Two) to Defendant Ameron Water Transmission Group, LLC (served on July 19, 2019) (Montoya Action)	3.10	0
Review and Analyze Documents Produced by Defendant (served on July 19, 2019) (Montoya Action)	2.90	0
Review and Analyze Documents Produced by Defendant (served on July 23, 2019) (Montoya Action)	2.30	0
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard (sent on July 23, 2019) (Lane State Action)	1.10	0
Prepare for, Travel to/from, and Take the Deposition of Person Most Knowledgeable Brigitte Hunt (July 25, 2019; Houston, Texas) and Review Deposition Transcript (Montoya Action)	14.50	0
Review and Analyze Defendant Ameron International Corporation's Objection to Plaintiff Montoya's Second Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron International Corporation and Requests for Production of Documents (July 29, 2019; Wage and Hour Practices) (served on July 26, 2019) (Montoya Action)	1.20	0
Review and Analyze Defendant Ameron International Corporation's Amended Objection to Plaintiff Montoya's Second Re-Notice of Deposition of Person Most Knowledgeable at	1.10	0

Defendant Ameron International Corporation and Requests for Production of Documents (July 29, 2019; Wage and Hour Practices) (served on July 26, 2019) (Montoya Action)		
Draft Plaintiff Lane's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (August 14, 2019; Organizational Structures) (served on July 26, 2019) (Lane State Action)	0.90	0
Draft Plaintiff Lane's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (August 15, 2019; Wage and Hour Practices) (served on July 26, 2019) (Lane State Action)	1.20	0
Prepare for, Travel to/from, and Take the Deposition of Debbie Perez (July 29, 2019; Glendale, California) and Review Deposition Transcript (Montoya Action)	11.50	0
Review and Analyze Defendant Ameron International Corporation's Form Interrogatories – Employment Law (Set One) and Form Interrogatories - General (Set One) to Plaintiff Montoya (served on August 7, 2019) (Montoya Action)	0.70	0
Review and Analyze Defendant Ameron Pole Products, LLC's Objection to Plaintiff Lane's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (August 14, 2019; Organizational Structures) (served on August 9, 2019) (Lane State Action)	0.90	0
Review and Analyze Defendant Ameron Pole Products, LLC's Objection to Plaintiff Lane's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (August 15, 2019; Wage and Hour Practices) (served on August 9, 2019) (Lane State Action)	1.20	0
Draft Follow-Up Letter to Defendant Ameron Pole Products, LLC and National Oilwell Varco, Inc. Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff LeCostel Williams (served on August 28, 2019)	2.10	0

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff LeCostel Williams (served on September 25, 2019)	1.20	1.50
Review and Analyze Documents Produced by Defendant (served on October 9, 2019) (Montoya Action)	3.20	0
Review and Analyze Documents Produced by Defendant (served on October 16, 2019) (Montoya Action)	3.30	0
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 21, 2019)	1.90	0
Review and Analyze Defendant Ameron International Corporation's Special Interrogatories (Set One); Declaration of Alexandra M. Witte in Support Thereof and Requests for Production of Document (Set One) to Plaintiff Montoya (served on November 25, 2019) (Montoya Action)	0.90	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Special Interrogatories (Set One); Declaration of Alexandra M. Witte in Support Thereof and Requests for Production of Document (Set One) to Plaintiff Montoya (served on November 25, 2019) (Montoya Action)	0.90	0
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 2, 2019)	1.90	0
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 5, 2019)	2.10	0
Review Defendant Ameron International Corporation's Notice of Videotaped Deposition of Plaintiff Miguel Montoya (served on December 10, 2019) (Montoya Action)	0.90	0

Meet and Confer with Defendants' Counsel, Draft, Revise, and/or Review <i>Belaire-West</i> Administration Notice and Opt-Out Postcard, Monitor Notice Mailing Process, and Review Contact List (mailing on October 31, 2019; release date December 6, 2019) (Montoya Action)	5.70	0
Review and Analyze Documents Produced by Defendant (served on December 10, 2019) (Lane State Action)	0.80	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Amended Supplemental Response to Plaintiff Montoya's Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Production of Document (Set One), and Requests for Production of Document (Set Two) to Defendant Ameron Water Transmission Group, LLC (served on December 24, 2019) (Montoya Action)	3.70	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Second Amended Supplemental Response to Plaintiff Montoya's Special Interrogatories (Set One), Special Interrogatories (Set Two), Requests for Production of Document (Set One), and Requests for Production of Document (Set Two) to Defendant Ameron Water Transmission Group, LLC (served on December 24, 2019) (Montoya Action)	3.20	0
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on January 6, 2020)	2.30	0
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on January 8, 2020)	1.80	0
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on January 8, 2020)	2.10	0

Draft Plaintiff Montoya's Objection to Notice of Videotaped Deposition of Plaintiff Miguel Montoya (served on January 16, 2020) (Montoya Action)	0.90	0
Review Defendant Ameron International Corporation's Notice of Continued Videotaped Deposition of Plaintiff Miguel Montoya by Agreement (served on January 30, 2020) (Montoya Action)	0.80	0
Review Defendant Ameron International Corporation's First Amended Notice of Videotaped Deposition of Plaintiff Miguel Montoya (served on January 30, 2020) (Montoya Action)	0.90	0
Review and Analyze Documents Produced by Defendants (served on January 31, 2020) (Montoya Action)	9.50	0
Review and Analyze Documents Produced by Defendants (served on February 7, 2020) (Montoya Action)	0.30	0
Review and Analyze Documents Produced by Defendant (served on February 11, 2020) (Montoya Action)	1.10	0
Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Miguel Montoya (February 11, 2020; Los Angeles, California) and Review Deposition Transcript (Montoya Action)	15.10	0
Review and Analyze Documents Produced by Defendant (served on February 14, 2020) (Montoya Action)	21.50	0
Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Miguel Montoya (March 10, 2020; Ontario, California) and Review Deposition Transcript (Montoya Action)	10.20	0
Review Defendants' Notice of Deposition of Plaintiff Nicholas Lane (served on September 16, 2020) (Lane State Action)	0.70	0

Review and Analyze Documents Produced by Defendant (served on October 21, 2020) (Montoya Action)	30.40	7.80
Draft Plaintiff Lane's Special Interrogatories (Set Four) and Requests for Production of Documents (Set Three) to Defendant Ameron Pole Products, LLC (served on November 10, 2020) (Lane State Action)	2.80	0
Review Defendant Ameron International Corporation's Notice of Videotaped Deposition of Putative Class Member (served on November 13, 2020) (Montoya Action)	0.80	0.20
Review Defendant Ameron International Corporation's Notice of Videotaped Deposition of Putative Class Member (served on November 13, 2020) (Montoya Action)	0.80	0.20
Review Defendant Ameron International Corporation's Notice of Videotaped Deposition of Putative Class Member (served on November 13, 2020) (Montoya Action)	0.80	0.20
Review and Analyze Documents Produced by Defendant (served on November 13, 2020) (Montoya Action)	4.30	2.50
Review Defendants' Notice of Taking Videotaped Deposition of Designated Expert Richard Drogin, PhD and Request for Production of Documents (served on November 18, 2020) (Montoya Action)	0.80	02.0
Review and Analyze Defendants' Special Interrogatories (Set Two); Declaration of Carter L. Norfleet in Support Thereof and Requests for Production of Document (Set Two) to Plaintiff Montoya (served on November 18, 2020) (Montoya Action)	0.90	0.20
Review Defendants' Amended Notice of Videotaped Deposition of Putative Class Member (served on November 23, 2020) (Montoya Action)	0.800	0.10

Review Defendants' Amended Notice of Taking Videotaped Deposition of Designated Expert Richard Drogin, PhD and Request for Production of Documents (served on November 30, 2020) (Montoya Action)	0.70	0.20
Prepare for and Defend the Deposition of Donley Keith Mullins (November 30, 2020; Zoom Video Conference) and Review Deposition Transcript (Montoya Action)	6.50	3.10
Prepare for, Travel to/from and Defend the Deposition of Daniel Farnsworth (December 1, 2020; Ontario, California) and Review Deposition Transcript (Montoya Action)	6.10	2.90
Prepare for, Travel to/from, and Defend the Deposition of Eric Deon Narvaiz (December 1, 2020; Victorville, California) and Review Deposition Transcript (Montoya Action)	8.50	3.80
Draft Plaintiff Montoya's Responses to Defendant Ameron International Corporation's Special Interrogatories (Set Two) and Requests for Production of Document (Set Two) to Plaintiff Montoya (served on July 7, 2021) (Montoya Action)	6.50	0
Draft Plaintiff Montoya's Notice of Deposition of Non-Party Witness Dr. Daniel Slottje, PhD. (served on July 8, 2021) (Montoya Action)	0.90	0
Draft Plaintiff Montoya's Notice of Deposition of Non-Party Witness Mary Birk Jones (served on July 8, 2021) (Montoya Action)	0.90	0
Prepare for and Take the Deposition of Non-Party Witness Daniel Slottje, PhD. (July 14, 2021; Zoom Video Conference) and Review Deposition Transcript (Montoya Action)	4.10	0
Prepare for and Take the Deposition of Non-Party Witness Mary Birk Jones (July 23, 2021; Zoom Video Conference) and Review Deposition Transcript (Montoya Action)	4.80	0

Prepare for and Take the Deposition of Plaintiff Alonso Pelayo Renteria (July 28, 2021; Remotely via Esquire Virtual Remote Technology) and Review Deposition Transcript (Montoya Action)	6.50	0
Draft Plaintiff Montoya's Responses to Defendant Ameron International Corporation's Special Interrogatories (Set Two) and Requests for Production of Document (Set Two) to Plaintiff Montoya (served on August 5, 2021) (Montoya Action)	3.80	0
Prepare for and Take the Deposition of Marcos C. Barraza (August 9, 2021; Remote) and Review Deposition Transcript (Montoya Action)	5.70	0
Prepare for and Take the Deposition of Maria Fernanda Valverde (August 11, 2021; Zoom Video Conference) and Review Deposition Transcript (Montoya Action)	5.60	0
Prepare for and Take the Deposition of Juan A. Carrillo (August 18, 2021; Zoom Video Conference) and Review Deposition Transcript (Montoya Action)	5.90	0
Review and Analyze Defendant Ameron Pole Products, LLC's Responses to Plaintiff Lane's Special Interrogatories (Set Four) and Requests for Production of Documents (Set Three) to Defendant Ameron Pole Products, LLC (served on August 23, 2021) (Lane State Action)	3.80	0
Draft Plaintiff Lane's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (September 28, 2021; Organizational Structures) (served on September 14, 2021) (Lane State Action)	0.90	0
Draft Plaintiff Lane's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole Products, LLC and Request for Productions of Documents (October 1, 2021; Wage and Hour Practices) (served on September 14, 2021) (Lane State Action)	1.10	0
Review and Analyze Defendant Ameron Pole Products, LLC's Objection to Plaintiff Lane's Re-Notice of Deposition of Person Most Knowledgeable at Defendant Ameron Pole	1.50	0

Products, LLC and Request for Productions of Documents (October 1, 2021; Wage and Hour Practices) (served on September 23, 2021) (Lane State Action)		
Prepare for and Take the Deposition of Person Most Knowledgeable Deanna Garibaldi (September 28, 2021; Zoom Video Conference) and Review Deposition Transcript (Lane State Action)	7.50	0
Research and Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Jose Rosendo Camarillo for Penalties Under California Labor Code Section 2698, <i>et seq.</i> (served on June 2, 2021)	4.10	0
Meet with, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	31.50	0
Review and Analyze Data, Documents, and Information Obtained from Defendants and Other Sources Prior to Mediation (served on May 11, 2021)	29.50	12.50
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, and Performing Violation, Damages, and Penalties Analysis and Calculations (submitted on June 3, 2021)	18.50	7.50
Attend Mediation Session (June 7, 2021; Zoom Video Conference)	8.50	8.50
Review and Analyze Defendant National Oil Well Varco, LP's Requests for Production (Set One) to Plaintiff LeCostel Williams (Served August 6, 2021) (Williams Action)	0	1.50
Review and Analyze Defendant National Oil Well Varco, LP's Special Interrogatories (Set One) to Plaintiff LeCostel Williams (Served August 6, 2021)	0	1.50
Draft, Prepare, Review Draft and Final Responses to Defendant National Oil Well Varco, LP's Requests for Production, (Set One) to Plaintiff LeCostel Williams (Served August 6, 2021)	0	5.50

Draft, Prepare, Review Draft and Final Responses to Defendant National Oil Well Varco, LP's Special Interrogatories (Set One) to Plaintiff LeCostel Williams (Served August 6, 2021)	0	6.50
Review and Analyze Additional Data, Documents, and Information Obtained from Defendants and Other Sources After Mediation	6.50	2.50
Prepare for and Engage in Additional Settlement Negotiations Through Mediator, Review of Mediator's Proposal, and Draft, Revise, Review, and Negotiate Memorandum of Understanding (fully executed October 19, 2021)	10.50	3.50
Draft, Revise, Review, Negotiate, and/or Finalize Joint Stipulation and Settlement Agreement of Class Action and PAGA Claims (executed on May 19, 2022) and Exhibits	15.50	3.50
Review and Monitor Settlement Administration Process and Weekly Reports	7.50	3.50
Review and Analyze Defendant Ameron International Corporation's Notice of Demurrer and Demurrer to Plaintiff Montoya's Complaint, Request for Judicial Notice in Support Thereof, Declaration of Alis M. Moon in Support Thereof, and [Proposed] Order Thereon (served on November 9, 2017) (Montoya Action)	2.10	0
Review and Analyze Defendant Ameron International Corporation's Notice of Motion and Motion for Sanctions Against Plaintiff and His Counsel in the Amount of \$15,332.50 Pursuant to Code of Civil Procedure Section 128.7; Memorandum of Points and Authorities in Support Thereof, Declaration of Alis M. Moon in Support Thereof, Declaration of Debbie Perez in Support Thereof, and [Proposed] Order Thereon (served on December 12, 2017) (Montoya Action)	2.80	0
Draft Plaintiff Montoya's Opposition to Defendant Ameron International Corporation's Demurrer to Plaintiff Montoya's Complaint, Opposition to Request for Judicial Notice in	14.50	0

Support Thereof, and Declaration of Edwin Aiwarzian in Support Thereof (filed on January 10, 2018) (Montoya Action)		
Draft Plaintiff Montoya's Opposition to Defendant Ameron International Corporation's Motion for Sanctions Against Plaintiff and His Counsel in the Amount of \$15,332.50 Pursuant to Code of Civil Procedure Section 128.7 and Request for Sanctions Against Defendant, Declaration of Edwin Aiwarzian in Support Thereof, and Declaration of Jill J. Parker in Support Thereof (filed on January 10, 2018) (Montoya Action)	22.50	0
Review and Analyze Defendant Ameron International Corporation's Reply in Support of Defendant Ameron International Corporation's Demurrer to Plaintiff Montoya's Complaint (served on January 17, 2018) (Montoya Action)	1.90	0
Review and Analyze Defendant Ameron International Corporation's Reply in Support of Motion for Sanctions Against Plaintiff and His Counsel in the Amount of \$15,332.50 Pursuant to Code of Civil Procedure Section 128.7 and Declaration of Alis M. Moon in Support Thereof (served on January 17, 2018) (Montoya Action)	2.10	0
Review Court's Minute Order Re: Motion for Sanctions (filed on January 24, 2018) (Montoya Action)	0.10	0
Draft Plaintiff Montoya's Notice of Motion and Motion to Compel Defendant Ameron International Corporation to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Set One) Nos. 1 and 2, Rule 3.1345 Separate Statement in Support Thereof, Declaration of Vanessa M. Rodriguez in Support Thereof, and [Proposed] order Thereon (filed on February 14, 2018) (Montoya Action)	17.50	0
Review and Analyze Defendant Ameron International Corporation's Opposition to Plaintiff Montoya's Notice of Motion and Motion to Compel Defendant Ameron International Corporation to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Set	2.30	0

One) Nos. 1 and 2, Declaration of Alis M. Moon in Support Thereof, and Declaration of Debbie Perez in Support Thereof (served on February 27, 2018) (Montoya Action)		
Draft Plaintiff Montoya's Reply in Support of Motion to Compel Defendant Ameron International Corporation to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Set One) Nos. 1 and 2, and Declaration of Jill J. Parker in Support Thereof (filed on March 5, 2018) (Montoya Action)	8.40	0
Review Court's Minute Order Re: Motion to Compel Further Responses to Special Interrogatories (filed on March 12, 2018) (Montoya Action)	0.10	0
Draft Plaintiff Montoya's Notice of Ruling Re: Plaintiff Montoya's Motion to Compel Defendant Ameron International Corporation to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Set One) Nos. 1 and 2 (filed on March 12, 2018) (Montoya Action)	0.30	0
Review and Analyze Defendant Ameron International Corporation's Notice of Motion and Motion for Summary Judgment, Memorandum of Points and Authorities in Support Thereof, Separate Statement of Undisputed Facts and Conclusions of Law in Support Thereof, Declaration of Alis M. Moon in Support Thereof, Declaration of Debbie Perez in Support Thereof, and [Proposed] Order Thereon (served on April 6, 2018) (Montoya Action)	3.60	0
Draft Plaintiff Montoya's Notice of Motion and Motion to Enforce the Court's March 12, 2018 Order Granting Plaintiff's Motion to Compel and Request for Monetary Sanctions, Declaration of Jill J. Parker in Support Thereof, and [Proposed] Order Thereon (filed on April 17, 2018) (Montoya Action)	5.50	0
Review and Analyze Defendant Ameron International Corporation's Notice of Motion and Motion for Sanctions Against Plaintiff and His Counsel in the Amount of \$59,329 Pursuant to Code of Civil Procedure Section 128.7; Memorandum of Points and Authorities in	3.70	0

Support Thereof, Declaration of Alis M. Moon in Support Thereof, and Declaration of Debbie Perez in Support Thereof (served on May 3, 2018) (Montoya Action)		
Draft Plaintiff Montoya's Notice of Motion and Motion to Compel Deposition of Debbie Perez and Request for Monetary Sanctions, Declaration of Jill J. Parker in Support Thereof, Declaration of Edwin Aiwasian in Support Thereof, and [Proposed] Order Thereon (filed on May 11, 2018) (Montoya Action)	4.50	0
Draft Plaintiff Montoya's Notice of Consolidated Motion and Consolidated Motion to Compel the Depositions of Defendant Ameron International Corporation's Persons Most Knowledgeable and Request for Monetary Sanctions; Memorandum of Points and Authorities in Support Thereof, Rule 3.1345 Separate Statements [December 20, 2017 Notice and December 21, 2017 Notice] in Support Thereof, Declaration of Jill J. Parker in Support Thereof, Declaration of Edwin Aiwasian in Support Thereof, Declaration of Vanessa M. Rodriguez in Support Thereof, and [Proposed] Order Thereon (filed on May 11, 2018) (Montoya Action)	10.30	0
Review and Analyze Defendant Ameron International Corporation's Notice of Motion and Motion for Sanctions Against Plaintiff Montoya and his Counsel in the Amount of \$59, 329 Pursuant to Code of Civil Procedure Section 128.7; Memorandum of Point and Authorities in Support Thereof, Declaration of Alis M. Moon in Support Thereof, Declaration of Debbie Perez in Support Thereof, and [Proposed] Order Thereon (served on May 29, 2018) (Montoya Action)	3.50	0
Draft Plaintiff Montoya's Notice of Withdrawal of Plaintiff's Motion to Compel Deposition of Debbie Perez and Request for Monetary Sanctions (filed on June 1, 2018) (Montoya Action)	0.50	0
Draft Plaintiff Montoya's Opposition to Defendant Ameron International Corporation's Motion for Summary Judgment, Separate Statement of Undisputed Material Facts in Support	18.50	0

Thereof, Objections to Declaration of Debbie Perez, Declaration of Jill J. Parker in Support Thereof, and [Proposed] Order Thereon (filed on June 6, 2018) (Montoya Action)		
Draft Plaintiff Montoya's Opposition to Defendant Ameron International Corporation's Renewed Motion Sanctions Against Plaintiff Montoya and his Counsel in the Amount of \$59,329 Pursuant to Code of Civil Procedure Section 128.7, Declaration of Edwin Aiwarzian in Support Thereof, Declaration of Jill J. Parker in Support Thereof, Objections to Declaration of Debbie Perez in Support Thereof, and [Proposed] Order Thereon (filed on June 7, 2018) (Montoya Action)	21.70	0
Review and Analyze Defendant Ameron International Corporation's Reply in Support of Motion for Sanctions Against Plaintiff and His Counsel in the Amount of \$59,329 Pursuant to Code of Civil Procedure Section 128.7, Declaration of Alis M. Moon in Support Thereof, and [Proposed] Order Thereon (served on June 13, 2018) (Montoya Action)	1.60	0
Review and Analyze Defendant Ameron International Corporation's Opposition to Plaintiff Montoya's Motion to Enforce the Court's March 12, 2018 Order and Request for Monetary Sanctions and Declaration of Alis M. Moon in Support Thereof (served on June 14, 2018) (Montoya Action)	2.10	0
Review and Analyze Defendant Ameron International Corporation's Reply in Support of Motion for Summary Judgment, Response to Plaintiff Montoya's Objections to Declaration of Debbie Perez in Support of Motion for Summary Judgment, Separate Statement to Additional Undisputed Material Facts in Support Thereof, Declaration of Alis M. Moon in Support Thereof, and [Proposed] Order Thereon (served on June 15, 2018) (Montoya Action)	2.80	0
Review Court's Minute Orders Re: Motion for Sanctions and Motion for Summary Judgment (filed on June 20, 2018) (Montoya Action)	0.20	0

Draft Plaintiff Montoya's Reply in Support of Motion to Enforce the Court's March 12, 2018 Order and Request for Monetary Sanctions, and Declaration of Vanessa M. Rodriguez in Support Thereof (filed on June 20, 2018) (Montoya Action)	8.50	0
Review Court's Minute Order Granting Motion to Enforce the Court's March 12, 2018 Order and Request for Monetary Sanctions (filed on June 27, 2018) (Montoya Action)	0.10	0
Review Court's Ruling on Motion for Summary Judgment (filed on June 27, 2018) (Montoya Action)	0.20	0
Review and Analyze Defendant Ameron International Corporation's Opposition to Plaintiff Montoya's Motion to Compel Deposition of Defendant Ameron International Corporation's Persons Most Knowledgeable and Request for Monetary Sanctions, Declaration of Alis M. Moon in Support Thereof, Response to Plaintiff Montoya's Rule 3.1345 Separate Statements [December 20, 2017 Notice and December 21, 2017 Notice] in Support of His Consolidated Motion to Compel (served on July 5, 2018) (Montoya Action)	1.80	0
Review and Analyze Defendant Ameron International Corporation's Ex Parte Application to Stay the Proceedings and [Proposed] Order Thereon (served on July 6, 2018) (Montoya Action)	1.10	0
Draft Plaintiff Montoya's Reply in Support of Consolidated Motion to Compel the Depositions of Defendant Ameron International Corporation's Persons Most Knowledgeable and Request for Monetary Sanctions, Declaration of Vanessa M. Rodriguez in Support Thereof, and Declaration of Ari Jon Filian in Support Thereof (filed on July 11, 2018) (Montoya Action)	3.50	0
Draft Notice of Plaintiff Montoya's Consolidated Motion to Compel the Depositions of Defendant Ameron International Corporation's Persons Most Knowledgeable and Request for Monetary Sanctions (filed on July 19, 2018) (Montoya Action)	0.20	0

Draft Plaintiff Montoya's Notice of Demurrer and Demurrer to Defendant Ameron Water Transmission Group, LLC's Answer, Notice of Motion and Motion Strike Portions of Defendant Ameron Water Transmission Group, LLC's Answer, and Declaration of Edwin Aiwazian in Support Thereof (filed on August 3, 2018) (Montoya Action)	12.90	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Opposition to Plaintiff Montoya's Demurrer to Defendant Ameron Water Transmission Group, LLC's Answer and Motion Strike Portions of Defendant Ameron Water Transmission Group, LLC's Answer (served on September 20, 2018) (Montoya Action)	1.50	0
Draft Plaintiff Montoya's Reply in Support of Plaintiff's Demurrer to Defendant and Motion to Strike Portions of Defendant Ameron Water Transmission Group, LLC's Answer (filed on September 26, 2018) (Montoya Action)	6.80	0
Review Court's Notice of Continuance of Demurrer and Motion to Strike (filed on October 2, 2018) (Montoya Action)	0.10	0
Draft Plaintiff Lane's Notice of Motion and Motion to Strike Portions of Defendants' Answer to Plaintiff's Class Action Complaint; Memorandum of Points and Authorities; and Declaration of Michelle L. Page in Support Thereof, and [Proposed] Order Thereon (filed on October 2, 2018) (Lane Federal Action)	10.80	0
Draft Plaintiff Lane's Notice of Motion and Motion to Remand Pursuant to 28 U.S.C. §1447; Memorandum of Points and Authorities in Support Thereof, Declaration of Ari Jon Filian in Support Thereof, Declaration of Michelle L. Page in Support Thereof, and [Proposed] Order Thereon (filed on October 5, 2018) (Lane Federal Action)	16.50	0
Review and Analyze Defendant Ameron Pole Products, LLC's Opposition to Plaintiff Lane's Motion to Strike Portions of Defendants' Answer to Plaintiff's Class Action Complaint (served on October 15, 2018) (Lane Federal Action)	1.60	0

Review and Analyze Defendant Ameron Pole Products, LLC's Opposition to Plaintiff Lane's Motion to Remand (served on October 15, 2018) (Lane Federal Action)	1.20	0
Draft Plaintiff Lane's Reply in Support of Plaintiff's Motion to Strike Portions of Defendants' Answer to Plaintiff's Class Action Complaint (filed on October 19, 2018) (Lane Federal Action)	6.50	0
Draft Plaintiff Lane's Reply in Support of Plaintiff's Motion to Remand (filed on October 22, 2018) (Lane Federal Action)	7.30	0
Draft Plaintiff Montoya's Notice of Motion and Motion to Compel the Deposition of Defendant Ameron Water Transmission Group, LLC's Person Most Knowledgeable and Request for Monetary Sanctions; Memorandum of Points and Authorities in Support Thereof, Rule 3.1345 Separate Statement in Support Thereof, Declaration of Edwin Aiwazian in Support Thereof, Declaration of Jill J. Parker in Support Thereof, Declaration of Vanessa M. Rodriguez in Support Thereof, and [Proposed] Order Thereon (filed on November 2, 2018) (Montoya Action)	8.50	0
Draft Plaintiff Montoya's Notice of Consolidated Motion and Consolidated Motion to Compel the Deposition of Defendant Ameron International Corporation's Person Most Knowledgeable and Request for Monetary Sanctions; Memorandum of Points and Authorities in Support Thereof, Rule 3.1345 Separate Statement [August 20, 2018 and August 21, 2018] in Support Thereof, Declaration of Edwin Aiwazian in Support Thereof, Declaration of Jill J. Parker in Support Thereof, Declaration of Vanessa M. Rodriguez in Support Thereof, and [Proposed] Order Thereon (filed on November 2, 2018) (Montoya Action)	8.90	0
Draft Plaintiff Montoya's Notice of Consolidated Motion and Consolidated Motion to Compel Defendant Ameron Water Transmission Group, LLC to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Sets One and Two), Form Interrogatories - General (Set One), and Request for Production of Documents (Set One), and Request for	4.50	0

Monetary Sanctions; Rule 3.1345 Separate Statement [Form Interrogatories - General (Set One)], Rule 3.1345 Separate Statement [Special Interrogatories (Set One)] in Support Thereof, Rule 3.1345 Separate Statement [Special Interrogatories (Set Two)], Rule 3.1345 Separate Statement [Request for Production of Documents (Set One)] in Support Thereof, Declaration of Vanessa M. Rodriguez in Support Thereof, and [Proposed] Orders Thereon (filed on November 2, 2018) (Montoya Action)		
Draft Plaintiff Montoya's Notice of Consolidated Motion and Consolidated Motion to Compel Defendant Ameron International Corporation to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Set Two) and Request for Production of Documents (Set One), and Request for Monetary Sanctions; Rule 3.1345 Separate Statement [Special Interrogatories (Set Two) Numbers 3, 6, 18-20, and 23-29] in Support Thereof, Rule 3.1345 Separate Statement [Request for Production of Documents (Set One) Numbers 1, 5-6, 9, 13-26, 33-34, 41-46, 51-52, 54, 56-57, 69-70, 72-75, 77-78, and 80-84] in Support Thereof, Declaration of Vanessa M. Rodriguez in Support Thereof, and [Proposed] Orders Thereon (filed on November 2, 2018) (Montoya Action)	19.10	0
Draft Plaintiff Montoya's Notice of Consolidated Motion and Consolidated Motion to Compel Defendant Ameron International Corporation to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Set Three) and Request for Production of Documents (Set Two), and Request for Monetary Sanctions; Rule 3.1345 Separate Statement [Special Interrogatories (Set Three) Numbers 33, 45, 49, 65 and 69] in Support Thereof, Rule 3.1345 Separate Statement [Request for Production of Documents (Set Two) Numbers 1-2, 4-5, 7-8, 10-11, 13-14, 16-17, 25-26, 28-29, 31-32, 34-35, 37-38, 40-41, 43-44, 49-50, 55-56, 58-59, 60-62, 64-65, and 67-68] in Support Thereof, Declaration of Vanessa M. Rodriguez in Support Thereof, and [Proposed] Orders Thereon (filed on November 2, 2018) (Montoya Action)	7.40	0
Draft Plaintiff Montoya's Notice of Consolidated Motion and Consolidated Motion to Compel Defendant Ameron Water Transmission Group, LLC to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Set Three) and Request for Production of	3.50	0

Documents (Set Two), and Request for Monetary Sanctions; Rule 3.1345 Separate Statement [Special Interrogatories (Set Three)] in Support Thereof, Rule 3.1345 Separate Statement [Request for Production of Documents (Set Two)] in Support Thereof, Declaration of Vanessa M. Rodriguez in Support Thereof, and [Proposed] Orders Thereon (filed on November 2, 2018) (Montoya Action)		
Review Court's Minute Order Granting Motion to Remand (filed on November 5, 2018) (Lane Federal Action)	0.40	0
Draft Notice of Errata and Correction to Plaintiff Montoya's Notice of Consolidated Motion and Consolidated Motion to Compel the Deposition of Defendant Ameron Water Transmission Group, LLC to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Sets One and Two), Form Interrogatories - General (Set One), and Request for Production of Documents (Set One), and Request for Monetary Sanctions (filed on November 7, 2018) (Montoya Action)	0.80	0
Draft Plaintiff Lane's Notice of Demurrer and Demurrer to Defendant Ameron Pole Products, LLC's Answer, Notice of Motion and Motion to Strike Portions of Defendant Ameron Pole Products, LLC's Answer, and Declaration of Edwin Aiwasian in Support Thereof (filed on November 13, 2018) (Lane State Action)	11.50	0
Review and Analyze Defendant Ameron Pole Products, LLC's Opposition to Plaintiff Lane's Demurrer to Defendants' Answer and Motion to Strike Portions of Defendants' Answer (served on November 30, 2018) (Lane State Action)	1.60	0
Draft Plaintiff Lane's Replies in Support of Plaintiff's Demurrer to Defendants' Answer and Motion to Strike Portions of Defendants' Answer (filed on December 7, 2018) (Lane State Action)	6.80	0
Review Court's Minute Order Re: Plaintiff's Motion to Strike and Demurrer (filed on December 13, 2018) (Lane State Action)	0.10	0

Review and Analyze Defendant Ameron International Corporation's Opposition to Plaintiff Montoya's Motion to Compel Defendant Ameron International Corporation to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Set Two) and Request for Production of Documents (Set One), Declaration of Alis M. Moon in Support Thereof, Response to Rule 3.1345 Separate Statement (Special Interrogatories (Set Two) Numbers 3, 6, 18-20, and 23-29) in Support Thereof, Response to Rule 3.1345 Separate Statement (Request for Production of Documents (Set One) Numbers 1, 5-6, 9, 13-26, 33-34, 41-46, 51-52, 54, 56-57, 69-70, 72-75, 77-78, and 80-84) in Support Thereof (served on January 9, 2019) (Montoya Action)	1.20	0
Review and Analyze Defendant Ameron International Corporation's Opposition to Plaintiff Montoya's Motion to Compel Defendant Ameron International Corporation to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Set Three) and Request for Production of Documents (Set Two), Declaration of Alis M. Moon in Support Thereof, Response to Rule 3.1345 Separate Statement (Special Interrogatories (Set Two) Numbers 33, 35, 49, 65 and 69) in Support Thereof, Response to Rule 3.1345 Separate Statement (Request for Production of Documents (Set One) Numbers 1-2, 4-5, 7-8, 10-11, 13-14, 16-17, 25-26, 28-29, 31-32, 34-35, 37-38, 40-41, 43-44, 49-50, 55-56, 58-59, 60-62, 64-65, and 67-68) in Support Thereof (served on January 9, 2019) (Montoya Action)	2.20	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Opposition to Plaintiff Montoya's Motion to Compel Defendant Ameron Water Transmission Group, LLC's to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Sets One and Two), Form Interrogatories - General (Set One), and Request for Production of Documents (Set One), Declaration of Alis M. Moon in Support Thereof, Response to Rule 3.1345 Separate Statement (Form Interrogatories - General (Set One)), Response to Rule 3.1345 Separate Statement (Special Interrogatories (Set One)), Response to Rule 3.1345 Separate Statement (Special Interrogatories (Set Two)) in Support Thereof, Response to Rule 3.1345 Separate Statement (Request for Production of Documents (Set One)) in Support Thereof (served on January 10, 2019) (Montoya Action)	1.10	0

Review and Analyze Defendant Ameron International Corporation's Opposition to Plaintiff Montoya's Motion to Compel the Depositions of Defendant Ameron International Corporation's Persons Most Knowledgeable, Response to Rule 3.1345 Separate Statement (August 20, 2018) in Support Thereof, Response to Rule 3.1345 Separate Statement (August 21, 2018) in Support Thereof Declaration of Alis M. Moon in Support Thereof (served on January 15, 2019) (Montoya Action)	1.50	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Opposition to Plaintiff Montoya's Motion to Compel Defendant Ameron Water Transmission Group, LLC's to Provide Further Responses to Plaintiff Montoya's Special Interrogatories (Set Three) and Request for Production of Documents (Set Two), Declaration of Alis M. Moon in Support Thereof, Response to Rule 3.1345 Separate Statement (Special Interrogatories (Set Three)), Response to Rule 3.1345 Separate Statement (Request for Production of Documents (Set Two)) in Support Thereof (served on January 15, 2019) (Montoya Action)	1.50	0
Review and Analyze Defendant Ameron Water Transmission Group, LLC's Opposition to Plaintiff Montoya's Motion to Compel the Depositions of Defendant Ameron Water Transmission Group, LLC's Persons Most Knowledgeable, Response to Rule 3.1345 Separate Statement in Support Thereof, Declaration of Alis M. Moon in Support Thereof (served on January 15, 2018) (Montoya Action)	1.10	0
Draft Plaintiff Montoya's Reply in Support of Plaintiff's Consolidated Motion to Compel Defendant Ameron International Corporation to Provide Further Responses to Plaintiff's Special Interrogatories (Set Two) and Request for Production of Documents (Set One), and Request for Monetary Sanctions (filed on January 15, 2019) (Montoya Action)	1.80	0
Draft Plaintiff Montoya's Reply in Support of Plaintiff's Consolidated Motion to Compel Defendant Ameron Water Transmission Group, LLC to Provide Further Responses to Plaintiff's Special Interrogatories (Sets One and Two), Form Interrogatories - General (Set One), and Request for Production of Documents (Set One), and Request for Monetary	2.80	0

Sanctions and Declaration of Jill J. Parker in Support Thereof (filed on January 16, 2019) (Montoya Action)		
Draft Plaintiff Montoya's Reply in Support to Plaintiff's Consolidated Motion to Compel the Depositions of Defendant Ameron International Corporation's Persons Most Knowledgeable and Request for Monetary Sanctions; Memorandum of Points and Authorities in Support Thereof (filed on January 22, 2019) (Montoya Action)	2.50	0
Draft Plaintiff Montoya's Reply in Support to Plaintiff's Consolidated Motion to Compel Defendant Ameron Water Transmission Group, LLC's to Provide Further Responses to Plaintiff's Special Interrogatories (Set Three) and Request for Production of Documents (Set Two), and Request for Monetary Sanctions and Declaration of Jill J. Parker in Support Thereof (filed on January 22, 2019) (Montoya Action)	2.10	0
Draft Plaintiff Montoya's Reply in Support to Plaintiff's Motion to Compel the Deposition of Defendant Ameron Water Transmission Group, LLC's Person Most Knowledgeable and Request for Monetary Sanctions; Memorandum of Points and Authorities in Support Thereof (filed on January 22, 2019) (Montoya Action)	2.50	0
Draft Plaintiff Montoya's Re-Notice of Hearings on Plaintiff's Motions to Compel (filed on February 11, 2019) (Montoya Action)	0.60	0
Draft Plaintiff Montoya's Supplemental Declaration of Edwin Aiwazian in Support of Plaintiff's Motions to Compel and Requests for Sanctions (filed on February 13, 2019) (Montoya Action)	1.90	0
Draft Plaintiff Montoya's Second Re-Notice of Hearings on Plaintiff's Motions to Compel (filed on April 5, 2019) (Montoya Action)	0.50	0

Review Court's Minute Order Re: Motion to Compel Deposition (filed on June 28, 2019) (Montoya Action)	0.10	0
Draft Plaintiff Lane's Notice of Motion and Motion for Leave to File First Amended Class Action Complaint, Declaration of Kenyon Harbison in Support Thereof, and [Proposed] Order Thereon (filed on July 21, 2020) (Lane State Action)	6.70	0
Review and Analyze Defendant Ameron Pole Products, LLC's Opposition to Plaintiff Lane's Motion for Leave to File First Amended Class Action Complaint, Declaration of Alexandra Besse in Support Thereof, Declaration of Christopher Rossman in Support Thereof, and Declaration of Alecia W. Winfield in Support Thereof (served on August 4, 2020) (Lane State Action)	0.90	0
Draft Plaintiff Lane's Reply in Support of Motion for Leave to File First Amended Class Action Complaint (filed on August 11, 2020) (Lane State Action)	4.90	0
Draft, Revise, and/or Review Plaintiff Montoya's Notice of Motion and Motion for Class Certification; Memorandum of Points and Authorities in Support Thereof, Compendium of Declarations in Support Thereof, Trial Plan in Support Thereof, Declaration of Talar DerOhannessian in Support Thereof, Declaration of Edwin Aiwarzian in Support Thereof, Declaration of Dr. Richard Drogin in Support Thereof, Declaration of Miguel Montoya in Support Thereof, Declaration of Daniel Farnsworth in Support Thereof, Declaration of Keith Mullins in Support Thereof, Declaration of Eric Narvaiz in Support Thereof, and [Proposed] Order Thereon (filed on October 23, 2020) (Montoya Action)	114.50	0
Review and Analyze Defendants' Opposition to Plaintiff Montoya's Motion for Class Certification, Compendium of Evidence in Support Thereof, Response and Objection to Trial Plan, and Objections to Evidence Submitted in Support Thereof (served on July 7, 2021) (Montoya Action)	14.50	0

Review and Analyze Defendants' Notice of Errata Re: Compendium of Evidence in Support of Defendants' Opposition to Plaintiff Montoya's Motion for Class Certification (Parts 1-11) (served on July 9, 2021) (Montoya Action)	13.70	0
Draft, Revise, and/or Review Plaintiff Montoya's Ex Parte Application for an Order Continuing the Deadline to File Plaintiff's Reply in Support of Plaintiff's Motion for Class Certification, Declaration of Won Christina Chang in Support Thereof, and [Proposed] Order (filed on July 30, 2021) (Montoya Action)	7.20	0.10
Review and Analyze Defendants' Opposition to Plaintiff Montoya's Ex Parte Application Requesting Additional Time to Submit Reply Brief; Declaration of Rachael Lavi in Support Thereof (submitted on July 30, 2021) (Montoya Action)	1.80	0.20
Draft, Revise, and/or Review Plaintiff Montoya's Reply in Support of Motion for Class Certification, Declaration of Elizabeth Parker-Fawley in Support Thereof, and Plaintiff's Objections to Defendants' Evidence in Support of Defendants' Opposition Thereon (filed on September 10, 2021) (Montoya Action)	49.50	0
Review and Analyze Defendants' Objections to Plaintiff's Evidence Submitted on Reply in Support of Motion for Class Certification (served on October 1, 2021) (Montoya Action)	1.70	0
Research, Draft, Revise, and/or Review Revise Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities, Declaration of Joanna Ghosh in Support Thereof, Declaration of Miguel Montoya in Support Thereof, Declaration of Nicholas Lane in Support Thereof, Declaration of Jose Rosendo Camarillo in Support Thereof, Declaration of LeCostel Williams in Support Thereof, and [Proposed] Order (filed on June 2, 2022) (Montoya Action)	16.50	8.50
Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on July 1, 2022) (Montoya Action)	0.20	0

Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Declaration of Edwin Aiwarzian in Support Thereof, and Declaration of V. Andre Sherman in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on October 13, 2022) (Anticipated)	18.40	8.80
Total Hours:	1,595.20	222.10
Grand Total Hours:	1,817.30	

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Montoya v. Ameron International Corporation

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/29/2017	Golden State Overnight	Courier Service	15.12
8/31/2017	FedEx Express	Courier Service	19.04
9/20/2017	ProLegal	Attorney Service	297.06
9/20/2017	San Bernardino Superior Court	Filing Fee	435.00
11/21/2017	Golden State Overnight	Courier Service	15.18
1/10/2018	Golden State Overnight	Courier Service	17.53
1/10/2018	ProLegal	Attorney Service	114.95
1/24/2018	Jill Parker	Travel Reimbursement	69.30
2/14/2018	ProLegal	Attorney Service	369.06
2/14/2018	San Bernardino Superior Court	Filing Fee	90.00
3/5/2018	Golden State Overnight	Courier Service	11.48
3/5/2018	ProLegal	Attorney Service	132.20
3/6/2018	ProLegal	Attorney Service	124.74
3/9/2018	Courtcall, LLC	Attorney Service	116.00
3/12/2018	ProLegal	Attorney Service	194.24
3/19/2018	Golden State Overnight	Courier Service	16.83
4/2/2018	Kimberly Morrow	Court Reporter	50.00
4/11/2018	Golden State Overnight	Courier Service	15.53
4/17/2018	ProLegal	Attorney Service	236.49
4/17/2018	San Bernardino Superior Court	Filing Fee	90.00
4/17/2018	U.S. Postmaster	Postage	6.70
5/11/2018	ProLegal	Attorney Service	367.99
5/11/2018	San Bernardino Superior Court	Filing Fee	90.00
5/11/2018	U.S. Postmaster	Postage	2.89
5/14/2018	Kimberly Morrow	Court Reporter	90.00
5/16/2018	Golden State Overnight	Courier Service	11.63
5/21/2018	Golden State Overnight	Courier Service	11.63
5/24/2018	Golden State Overnight	Courier Service	13.63
5/25/2018	Courtcall, LLC	Attorney Service	116.00
5/29/2018	Golden State Overnight	Courier Service	11.63
5/30/2018	ProLegal	Attorney Service	281.11
6/4/2018	ProLegal	Attorney Service	102.35
6/6/2018	Golden State Overnight	Courier Service	18.00
6/6/2018	ProLegal	Attorney Service	425.73
6/7/2018	Golden State Overnight	Courier Service	17.13
6/7/2018	ProLegal	Attorney Service	410.48
6/14/2018	U.S. Postmaster	Postage	56.00
6/20/2018	Golden State Overnight	Courier Service	17.13
6/20/2018	Jill Parker	Travel Reimbursement	72.49
6/20/2018	ProLegal	Attorney Service	185.74

LAWYERS for JUSTICE PC CASE COST DETAIL

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6/27/2018	Jill Parker	Travel Reimbursement	97.45
7/3/2018	San Bernardino Superior Court	Document Download Fee	1.00
7/6/2018	Courtcall, LLC	Attorney Service	86.00
7/6/2018	Golden State Overnight	Courier Service	11.68
7/7/2018	San Bernardino Superior Court	Document Download Fee	7.00
7/10/2018	Golden State Overnight	Courier Service	11.68
7/10/2018	Kimberly Morrow	Court Reporter	150.00
7/10/2018	ProLegal	Attorney Service	160.49
7/11/2018	Golden State Overnight	Courier Service	17.13
7/11/2018	ProLegal	Attorney Service	275.99
7/16/2018	Courtcall, LLC	Attorney Service	86.00
7/17/2018	Golden State Overnight	Courier Service	17.13
7/18/2018	Golden State Overnight	Courier Service	11.68
7/19/2018	ProLegal	Attorney Service	147.49
7/30/2018	Golden State Overnight	Courier Service	11.68
8/3/2018	Golden State Overnight	Courier Service	13.38
8/3/2018	ProLegal	Attorney Service	182.24
8/3/2018	San Bernardino Superior Court	Jury Fee	150.00
8/6/2018	ProLegal	Attorney Service	222.99
8/6/2018	Ventura Superior Court	Filing Fee	435.00
8/13/2018	Golden State Overnight	Courier Service	11.63
8/13/2018	Kimberly Morrow	Court Reporter	85.00
8/13/2018	Michelle Page	Travel Reimbursement	70.51
8/14/2018	ProLegal	Attorney Service	63.53
8/14/2018	ProLegal	Attorney Service	160.95
8/15/2018	ProLegal	Attorney Service	163.49
8/21/2018	Alice Kwak	Travel Reimbursement	154.00
9/17/2018	Ventura Superior Court	Document Download Fee	10.30
9/26/2018	Golden State Overnight	Courier Service	13.38
9/26/2018	ProLegal	Attorney Service	147.49
10/3/2018	ProLegal	Attorney Service	45.70
10/12/2018	ProLegal	Attorney Service	126.99
10/15/2018	Golden State Overnight	Courier Service	14.61
10/16/2018	Golden State Overnight	Courier Service	18.88
10/17/2018	Golden State Overnight	Courier Service	11.68
10/18/2018	Vanessa Rodriguez	Travel Reimbursement	31.55
10/19/2018	Golden State Overnight	Courier Service	14.61
10/22/2018	FedEx Express	Courier Service	24.94
10/22/2018	Golden State Overnight	Courier Service	14.61
10/24/2018	Golden State Overnight	Courier Service	11.68
10/26/2018	Jill Parker	Travel Reimbursement	29.00
11/2/2018	ProLegal	Attorney Service	303.28

LAWYERS for JUSTICE PC CASE COST DETAIL

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11/2/2018	San Bernardino Superior Court	Filing Fee	390.00
11/5/2018	Golden State Overnight	Courier Service	18.95
11/7/2018	ProLegal	Attorney Service	159.95
11/8/2018	ProLegal	Attorney Service	170.45
11/13/2018	Ventura Superior Court	Filing Fee	120.00
11/13/2018	ProLegal	Attorney Service	190.70
11/13/2018	Golden State Overnight	Courier Service	15.73
11/13/2018	Ventura Superior Court	Filing Fee	120.00
11/20/2018	Golden State Overnight	Courier Service	40.13
11/21/2018	Office of the Secretary of State, Texas	Document Download Fee	1.03
11/27/2018	ProLegal	Attorney Service	144.95
12/7/2018	Golden State Overnight	Courier Service	18.80
12/7/2018	ProLegal	Attorney Service	99.95
12/10/2018	CourtCall, LLC	Attorney Service	86.00
12/13/2018	ProLegal	Attorney Service	139.10
12/20/2018	ProLegal	Attorney Service	241.94
12/26/2018	ProLegal	Attorney Service	159.95
1/9/2019	Courtcall, LLC	Attorney Service	94.00
1/11/2019	ProLegal	Attorney Service	126.99
1/15/2019	Golden State Overnight	Courier Service	13.28
1/15/2019	ProLegal	Attorney Service	318.98
1/16/2019	Golden State Overnight	Courier Service	17.21
1/16/2019	ProLegal	Attorney Service	171.99
1/21/2019	San Bernardino Superior Court	Document Download Fee	15.00
1/22/2019	Golden State Overnight	Courier Service	13.28
1/22/2019	ProLegal	Attorney Service	191.24
1/29/2019	ProLegal	Attorney Service	159.95
1/29/2019	Golden State Overnight	Courier Service	13.28
2/11/2019	Golden State Overnight	Courier Service	13.17
2/11/2019	ProLegal	Attorney Service	171.99
2/12/2019	Golden State Overnight	Courier Service	13.17
2/13/2019	ProLegal	Attorney Service	218.49
2/14/2019	ProLegal	Attorney Service	156.99
3/1/2019	Golden State Overnight	Courier Service	13.23
3/1/2019	ProLegal	Attorney Service	156.99
3/6/2019	Courtcall, LLC	Attorney Service	94.00
3/7/2019	Golden State Overnight	Courier Service	18.58
3/11/2019	Golden State Overnight	Courier Service	13.23
3/20/2019	ProLegal	Attorney Service	116.95
3/20/2019	San Bernardino Superior Court	Filing Fee	20.00
3/22/2019	ProLegal	Attorney Service	158.45
3/25/2019	ProLegal	Attorney Service	99.95

LAWYERS for JUSTICE PC CASE COST DETAIL

Montoya v. Ameron International Corporation

3/25/2019	ProLegal	Attorney Service	15.00
4/19/2019	CourtCall, LLC	Attorney Service	124.00
4/24/2019	ProLegal	Attorney Service	114.95
6/11/2019	One Legal	Attorney Service	100.00
6/17/2019	General Logistics Systems US, Inc.	Courier Service	13.58
6/24/2019	Courtcall, LLC	Attorney Service	94.00
7/5/2019	U.S. Postmaster	Postage	1.45
7/10/2019	U.S. Postmaster	Postage	1.75
7/12/2019	Legal Document Server, Inc.	Attorney Service	165.00
7/12/2019	Ventura Superior Court	Complex Fee	1,000.00
7/19/2019	Kenyon Harbison	Travel Reimbursement	1,258.66
7/25/2019	Esquire Deposition Solutions, LLC	Videography Service	1,600.45
7/25/2019	Kenyon Harbison	Travel Reimbursement	471.26
7/26/2019	General Logistics Systems US, Inc.	Courier Service	17.41
8/15/2019	Golden State Overnight	Courier Service	18.41
8/21/2019	FedEx Express	Courier Service	21.52
8/28/2019	Coalition Court Reporters	Court Reporting Service	420.00
8/29/2019	CourtCall, LLC	Attorney Service	94.00
9/3/2019	One Legal	Attorney Service	100.66
9/3/2019	Ventura Superior Court	Filing Fee	20.00
9/5/2019	General Logistics Systems US, Inc.	Courier Service	14.68
9/6/2019	U.S. Postmaster	Postage	2.05
9/7/2019	FedEx Express	Courier Service	58.34
9/19/2019	U.S. Postal Services	Postage	2.20
10/8/2019	Legal Document Server, Inc.	Attorney Service	130.00
10/21/2019	Legal Document Server, Inc.	Attorney Service	130.00
10/31/2019	Simpluris, Inc.	Privacy Mailing	350.00
11/21/2019	Golden State Overnight	Courier Service	17.22
11/26/2019	FedEx Express	Courier Service	21.57
12/2/2019	U.S. Postmaster	Postage	13.70
12/2/2019	CourtCall, LLC	Attorney Service	94.00
12/2/2019	CourtCall, LLC	Attorney Service	94.00
12/5/2019	U.S. Postmaster	Postage	13.70
12/10/2019	Golden State Overnight	Courier Service	18.28
12/18/2019	FedEx Express	Courier Service	58.34
12/18/2019	Golden State Overnight	Courier Service	52.39
12/18/2019	Legal Document Server, Inc.	Attorney Service	195.00
12/27/2019	Courtcall, LLC	Attorney Service	94.00
12/30/2019	Golden State Overnight	Courier Service	20.97
12/30/2019	Legal Document Server, Inc.	Attorney Service	130.00
12/30/2019	Legal Document Server, Inc.	Attorney Service	65.00
1/16/2020	Legal Document Server, Inc.	Attorney Service	185.00

LAWYERS for JUSTICE PC CASE COST DETAIL

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2/5/2020	Simpluris, Inc.	Privacy Mailing	150.00
2/6/2020	General Logistics Systems US, Inc.	Courier Service	12.14
2/11/2020	Jill Parker	Travel Reimbursement	118.88
2/13/2020	General Logistics Systems US, Inc.	Courier Service	16.29
2/14/2020	General Logistics Systems US, Inc.	Courier Service	14.69
2/21/2020	General Logistics Systems US, Inc.	Courier Service	17.39
3/3/2020	Legal Document Server, Inc.	Attorney Service	130.00
3/10/2020	Jill Parker	Travel Reimbursement	99.75
3/10/2020	Ludwig Klein Reporters & Video, Inc.	Court Reporter	467.80
3/11/2020	General Logistics Systems US, Inc.	Courier Service	27.85
3/11/2020	Legal Document Server, Inc.	Attorney Service	130.00
3/22/2020	Courtcall, LLC	Attorney Service	94.00
4/4/2020	Drogin, Kakigi & Associates	Expert	5,300.00
7/21/2020	General Logistics Systems US, Inc.	Courier Service	32.00
7/21/2020	Legal Document Server, Inc.	Attorney Service	172.10
7/21/2020	Ventura Superior Court	Filing Fee	60.00
7/24/2020	General Logistics Systems US, Inc.	Courier Service	16.00
7/27/2020	U.S. Postal Services	Postage	46.75
8/5/2020	Drogin, Kakigi & Associates	Expert	8,075.00
8/11/2020	Legal Document Server, Inc.	Attorney Service	130.00
8/14/2020	CourtCall, LLC	Attorney Service	94.00
8/17/2020	Courtcall, LLC	Attorney Service	94.00
8/24/2020	Courtcall, LLC	Attorney Service	94.00
9/11/2020	Drogin, Kakigi & Associates	Expert	1,550.00
9/17/2020	Legal Document Server, Inc.	Attorney Service	120.00
9/25/2020	Legal Document Server, Inc.	Attorney Service	29.98
10/15/2020	Legal Document Server, Inc.	Attorney Service	64.98
10/15/2020	Kern County Superior Court	Court Filing Fee	435.00
10/15/2020	Kern County Superior Court	Complex Filing Fee	1,000.00
10/15/2020	Abrams, Mah & Kahn Reporting	Court Reporting Service	1,535.05
10/19/2020	San Bernardino Superior Court	Document Download Fee	2.00
10/23/2020	General Logistics Systems US, Inc.	Courier Service	22.23
10/23/2020	Legal Document Server, Inc.	Attorney Service	338.15
10/23/2020	San Bernardino Superior Court	Filing Fee	90.00
10/28/2020	Legal Document Server, Inc.	Attorney Service	330.00
11/6/2020	Drogin, Kakigi & Associates	Expert	5,250.00
11/10/2020	General Logistics Systems US, Inc.	Courier Service	28.05
11/18/2020	U.S. Postal Services	Postage	6.95
11/30/2020	Abrams, Mah & Kahn Reporting	Court Reporter	762.40
12/1/2020	Abrams, Mah & Kahn Reporting	Videography Service	688.15
12/1/2020	Abrams, Mah & Kahn Reporting	Court Reporter	1,041.15
12/1/2020	Legal Document Server, Inc.	Attorney Service	130.00

LAWYERS for JUSTICE PC CASE COST DETAIL

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12/7/2020	General Logistics Systems US, Inc.	Courier Service	19.87
12/8/2020	San Bernardino Superior Court	Document Download Fee	2.00
12/9/2020	FedEx Express	Courier Service	21.81
12/11/2020	CourtCall, LLC	Attorney Service	94.00
1/5/2021	General Logistics Systems US, Inc.	Courier Service	19.96
5/18/2021	Signature Resolution	Mediation Fee	7,450.00
6/29/2021	Signature Resolution	Supplemental Mediator's Fee	1,400.00
7/14/2021	Esquire Deposition Solutions, LLC	Videography Service	305.00
7/14/2021	Esquire Deposition Solutions, LLC	Court Reporter	684.60
7/14/2021	Legal Document Server, Inc.	Attorney Service	460.00
7/16/2021	Legal Document Server, Inc.	Attorney Service	266.22
7/19/2021	Legal Document Server, Inc.	Attorney Service	230.00
7/23/2021	Esquire Deposition Solutions, LLC	Videography Service	305.00
7/23/2021	Esquire Deposition Solutions, LLC	Court Reporter	1,153.61
7/28/2021	Esquire Deposition Solutions, LLC	Court Reporter	1,100.70
7/28/2021	Esquire Deposition Solutions, LLC	Videography Service	482.50
7/29/2021	Legal Document Server, Inc.	Attorney Service	230.00
7/30/2021	Legal Document Server, Inc.	Attorney Service	185.90
7/30/2021	San Bernardino Superior Court	Filing Fee	90.00
7/31/2021	Legal Document Server, Inc.	Attorney Service	230.00
8/3/2021	Courtcall, LLC	Attorney Service	94.00
8/6/2021	Legal Document Server, Inc.	Attorney Service	460.00
8/6/2021	CourtCall, LLC	Attorney Service	94.00
8/6/2021	General Logistics Systems US, Inc.	Courier Service	39.70
8/7/2021	Legal Document Server, Inc.	Attorney Service	265.00
8/9/2021	Esquire Deposition Solutions, LLC	Court Reporter	1,896.36
8/11/2021	Esquire Deposition Solutions, LLC	Court Reporter	1,258.65
8/12/2021	Legal Document Server, Inc.	Attorney Service	230.00
8/13/2021	General Logistics Systems US, Inc.	Courier Service	49.64
8/18/2021	Esquire Deposition Solutions, LLC	Court Reporter	2,159.49
9/10/2021	Legal Document Server, Inc.	Attorney Service	211.25
9/14/2021	General Logistics Systems US, Inc.	Courier Service	26.50
9/27/2021	Signature Resolution	Supplemental Mediator's Fee	7,000.00
9/28/2021	Esquire Deposition Solutions	Court Reporting Service	1,262.10
9/30/2021	CourtCall, LLC	Attorney Service	94.00
10/4/2021	Signature Resolution	Supplemental Mediator's Fee	4,200.00
10/8/2021	Courtcall, LLC	Attorney Service	94.00
12/15/2021	Courtcall, LLC	Attorney Service	94.00
2/14/2022	Legal Document Server, Inc.	Attorney Service	130.95
2/14/2022	San Bernardino Superior Court	Filing Fee	20.00
3/10/2022	Legal Document Server, Inc.	Attorney Service	146.35
3/10/2022	San Bernardino Superior Court	Filing Fee	20.00

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3/25/2022	Legal Document Server, Inc.	Attorney Service	126.35
3/25/2022	San Bernardino Superior Court	Filing Fee	20.00
4/29/2022	Legal Document Server, Inc.	Attorney Service	175.00
5/6/2022	Legal Document Server, Inc.	Attorney Service	146.35
5/6/2022	San Bernardino Superior Court	Filing Fee	20.00
5/17/2022	Legal Document Server, Inc.	Attorney Service	125.00
6/2/2022	Legal Document Server, Inc.	Attorney Service	262.08
6/2/2022	San Bernardino Superior Court	Filing Fee	90.00
7/5/2022	Courtcall, LLC	Attorney Service	188.00
7/7/2022	San Bernardino Superior Court	Document Download Fee	31.50
7/8/2022	Legal Document Server, Inc.	Attorney Service	194.00
10/14/2022	San Bernardino Superior Court	Document Download Fee	148.00
Total:			85,212.56