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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

GIANA BENSON, and on behalf of all others
similarly situated, MONICA FOWLER, an
individual, on behalf of herself and all others
similarly situated,

Plaintiffs,

v.

F21 OPCO, LLC dba FOREVER 21, a Delaware
Corporation; and DOES 1-10, inclusive,

Defendants.

GIANA BENSON, and on behalf of the general
public as private attorneys general,

Plaintiffs,

v.

F21 OPCO, LLC dba FOREVER 21, a Delaware
Corporation; and DOES 1-10, inclusive,

Defendants.

Lead Case No.:

37-2021-00024619-CU-OE-CTL

Consolidated with:

Benson v. F21 OPCO, LLC, San Diego County,
37-2021-00037256-CU-OE-CTL

Assigned for All Purposes To:

Judge: Eddie C. Sturgeon

Dept.: C-67

**DECLARATION OF CRAIG J. ACKERMANN
IN SUPPORT OF UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
SETTLEMENT, AND AWARD OF
ATTORNEYS' FEES AND COSTS**

Date: October 6, 2023

Time: 9:00 a.m.

1 **MELMED LAW GROUP P.C.**

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14 Attorneys for Plaintiffs, the Putative Class, and the Aggrieved Employees

1
2 I, Craig Ackermann, declare and state as follows:

3 1. I am an attorney licensed to practice law before this Court and the federal and state courts
4 of California, Texas, and Washington State. I am over 18 years of age. I have personal knowledge of the
5 facts set forth in this declaration and could and would testify competently to them.

6 2. I am a founding shareholder in the law firm of Ackermann & Tilajef, P.C. (“A&T,” “Co-
7 Class Counsel” or “Plaintiffs’ Counsel”), attorneys of record (along with James R. Hawkins and Christina
8 Lucio of James Hawkins APLC and Jonathan Melmed, Laura Supanich, and Maria Burciaga of Melmed
9 Law Group P.C.) for Plaintiffs Giana Benson and Monica Fowler (“Plaintiffs” or “Class
10 Representatives”) and the settlement class.

11 3. I have no knowledge of the existence of any conflicting interests between my firm and
12 any of its attorneys and our co-counsel on the one hand, and Plaintiffs or any other Class Member, on the
13 other. I join in the general description the claims, defenses, risks, damages and assessment that the
14 Settlement here in fair and reasonable set forth in my declarations in support of preliminary approval and
15 the declarations of my co-counsel filed in support of preliminary and final approval in this case.

16 4. The Court has preliminarily approved the class action settlement (the “Settlement”)
17 between Plaintiffs and Defendant, the notice process set forth in the Court’s order preliminarily approving
18 the Settlement (the “PA Order”) has been completed, and Plaintiffs and the conditionally certified
19 Settlement Class now seek an order granting final approval of the Settlement.

20 5. As detailed in the sworn declaration from the case manager for this case from the
21 Settlement Administrator, CPT Group, Inc., the Settlement Administrator has provided Notice in full
22 compliance with the Court’s preliminary approval order, and the results have been excellent. To date, the
23 Class Notice was mailed to 100% of the 9,652 Class Members, and all but 228 Class Members received
24 actual notice of the Settlement (a 97.6% success rate); not a single Class Member objected to the
25 Settlement; and only two Class Members requested exclusion from the Settlement (a 99.97%
26 participation rate). Therefore, the 9,650 Participating Class Members (those who did not affirmatively
27 opt out) will receive 100% of the Net Settlement Amount, which is estimated to be approximately
28 \$2,725,500.01, plus or minus (depending on the final tally of the actual costs incurred and judicial

1 approval of other settlement terms). Based on the foregoing results of the class notice process, the Class
2 overwhelmingly supports the Settlement, which is fair, adequate, and reasonable and treats all Class
3 Members fairly.

4 Attorney Experience and Contributions

5 6. I am an attorney licensed to practice law before the federal and state courts of California,
6 Texas, and Washington State. I have been admitted to the Fifth and Ninth Circuit Courts of Appeals. In
7 2018, I also became a member of the Bar of the U.S. Supreme Court. I have been practicing employment
8 law exclusively for over 24 years. Since 2006, I have been appointed lead or co-lead class counsel in
9 more than 300 wage and hour class actions and PAGA actions in California and Washington, in which,
10 collectively, we and our co-counsel have recovered over \$150 million for over 250,000 class members
11 in a variety of wage and hour class and PAGA representative actions.

12 7. In 1994, I received a B.A. with honors and graduated Phi Beta Kappa from the University
13 of Texas at Austin. In 1997, I received a J.D. from the University of Texas School of Law in Austin. I
14 became a member of the Bar of the State of Texas in 1997. From 1997 through 2000, I was an associate
15 in the labor and employment law group of Jenkins & Gilchrist, P.C. ("J&G"), in the firm's Dallas, Texas
16 office, where I represented Fortune 1000 companies, as second-chair in various employment-related
17 matters, including class actions. From 2000 through mid-2003, I worked in New York City for a plaintiffs'
18 side employment law firm, Arenson, Ditmar & Karban, where I was involved for several years, *pro hac*
19 *vice*, in a second-chair capacity representing 150 individually-named plaintiffs in a large sexual
20 harassment case in Hudson County New Jersey Superior Court against a major investment bank that was
21 eventually resolved after several years of intensive litigation for \$23.5 million. In mid- and late-2003, I
22 worked in the Labor and Employment Law Section of Mitchell, Silberberg & Knupp, LLP, in Los
23 Angeles, California, where I worked under the direction of several partners while awaiting my bar results
24 on various employment cases, including several large class actions.

25 8. I became a member of the Bar of the State of California in early 2004. From February
26 2004 through the present, I have been the founding and managing shareholder of Ackermann & Tilajef,
27 P.C. My firm and I have been appointed as class counsel in numerous cases where *contested* class
28 certification motions were fully briefed, class certification was granted, and I was appointed adequate

1 class counsel, including most recently: (1) *Martinez v. Knight Transportation*, Case No. 1:16-cv-01730-
2 DAD (Hon. Dale A. Drodz) (E.D.Cal. December 3, 2018) (order granting Plaintiffs Motion for Class
3 Certification certifying class of 3,800 truck drivers with claims of unpaid rest breaks and non-productive
4 time on California routes); and (2) *Moss v. USF Reddaway, Inc.*, No. 5:15-CV-01541-JAK-FFM, (C.D.
5 Cal. June 30, 2017) (Hon. John A. Kronstadt) (Order Granting Plaintiffs Motion for Class Certification
6 in unpaid rest break trucker class action for 540 line haul drivers).

7 9. On numerous occasions, U.S. district court judges have recognized my skill and our firm's
8 skill and expertise in the area of employment law wage and hour class actions. *See e.g., Pagh v. Wyndham*
9 *Vacation Ownership, Inc.*, Case No. 8:19-cv-00812-JWH-ADSx, Docket No. 52 (Order Granting
10 Plaintiffs' Motion for Attorneys' Fees and Costs [ECF No. 46], dated March 23 2021), the Honorable
11 John W. Holcomb, p. 6 (noting Mr. Ackermann's "extensive experience in labor and employment
12 litigation" and finding that "Mr. Ackermann's hourly rate of \$800 is reasonable"); *Moss v. USF*
13 *Reddaway, Inc.*, Case No. 5:15-cv-01541-JAK-FFM, Docket No. (Order Granting Final Approval, dated
14 July 25, 2018, where the Hon. Judge John Kronstadt, at p. 13 of 15 noted that "The attorneys and
15 paralegals who worked on this matter have substantial experience in complex employment litigation ...
16 For example, Craig Ackermann has served as lead counsel or co-lead counsel in more than 200 class
17 actions during his 21-year career ... "); *Santamour v. UPS Freight, Inc.*, Case No. 2:17-cv-00196, ECF
18 No. 33 (Order Granting Final Approval, dated June 26, 2018) (the Hon. Chief Judge Thomas Rice of the
19 Eastern District of Washington noted: "The Court, based on its independent review as well as its review
20 of the supporting documents submitted by Plaintiffs, finds the rates billed by Plaintiffs' counsel and
21 paralegals are commensurate with the prevailing rates for similar representation in the relevant market",
22 and approved my 2018 rate at \$717/hour); *Hollis v. Union Pacific Railroad Co.*, Case No. 5:17-cv-02449-
23 JGB-SHK, Docket No. 28 (Order Granting Final Approval and Attorneys' Fees dated Sept. 19, 2018),
24 the Hon. Jesus G. Bernal, at pp. 12-13 noted that "Here, Plaintiff's counsel ... Craig Ackermann billed
25 \$717 /hour The Court reviewed the experience of the respective. attorneys and finds the amount billed
26 per hour to be reasonable ... For instance, Craig Ackermann has been an employment attorney since 1997
27 and has handled numerous federal and state employment class action cases"); *Bykov v. DC*
28 *Transportation Services, Inc.*, Case No. 2:18-cv-1691 DB, Docket No. 29 (Order dated March 3, 2020),

1 (the Hon. Deborah Barnes, at pp. 7 and 11 noted that “plaintiff’s counsel are experienced litigators of
2 class actions involving the precise claims here, i.e., wage and hour disputes involving truck drivers” and
3 “[p]laintiff’s counsel has collectively represented hundreds of truck drivers in similar wage and hour
4 cases”).

5 10. Notably, on January 27, 2016, after 7 years of hotly contested litigation, including class
6 certification, multiple summary judgment motions, decertification, and preparation for the phase 1
7 liability trial, I was able to resolve the class case of *Jack Morrison v. Knight Transportation, Inc.*, Tulare
8 County Superior Court, Case No. 228016, for a maximum amount of \$2.25 million to the class of 4,100
9 drivers, with attorney's fees to be decided on a contested motion. The Honorable Judge Lloyd Hicks then
10 awarded my firm—the sole counsel on that case—\$1,125,000 in fees for over 2,700 hours of work,
11 including taking or defending of more than a dozen depositions, obtaining class certification, defeating
12 decertification, defeating two summary judgment motions, and preparing for the phase 1 liability trial.

13 11. I have also successfully tried employment cases to verdict. In December 2012, for
14 example, I and my firm obtained a Final Judgment in the amount of \$318,913.09 in a Title VII and FEHA
15 retaliation case after a general jury verdict for the Plaintiff following a full jury trial and a successful
16 appeal to the Ninth Circuit from the district court's denial of Plaintiffs motion for attorneys' fees. *See*
17 Final Judgment, *Barrios v. Diamond Contract Services, Inc.*, Case No. 2:07-cv- 03500-CBM-FMO (C.D.
18 Cal. Dec. 20, 2012), ECF No. 138 (final judgment entered for Plaintiff in the amount of \$318,913.09);
19 *see also Barrios v. Diamond Contract Services, Inc.*, 461 F. App'x 571 (9th Cir. Dec. 13, 2011) (reversing
20 original district court judge's denial of motion for attorneys' fees).

21 12. In the avoidance of redundancy, I will not repeat or recount the factual and procedural
22 history already set forth in my and my co-counsels’ Preliminary Approval Declarations. Suffice it to say,
23 however, that this case involved numerous complex issues summarized in section III.J of Plaintiffs’
24 Motion for Preliminary Approval. The complexity made this case highly risky and the results obtained
25 here are excellent.

26 13. I, along with the attorneys, paralegals, and legal assistants, at our law firm have diligently
27 investigated and prosecuted this case to a successful conclusion. Our work, in conjunction with the work
28 of our co-counsel, resulted in the creation of a significant and non-reversionary settlement amount for

1 the benefit of the Class. We avoided protracted litigation by conducting considerable investigation before
2 filing suit related to the class claims, and efficiently communicated and exchanged information with
3 Defense counsel such that the parties could successfully settle the case after being fully informed of the
4 merits of each sides' position. As a result of our efforts, we were able to obtain a favorable Settlement
5 for the Class. Because of the risks involved in litigating the case, particularly the contested legal and
6 factual issues, I believe this settlement to be fair, reasonable, and adequate as described in detail in
7 connection with preliminary approval.

8 14. I participated primarily in the settlement of this matter. If I had not been retained by
9 Plaintiffs, I would have spent my time working on other matters for which I would have received my
10 typical hourly rate, which at this stage of my career is \$919/hr. As a practical matter, I rarely work on an
11 hourly basis (except when negotiating executive severance packages), since 99% of our practice is
12 contingency-based plaintiffs' employment law matters and class actions.

13 15. Avi Kreitenberg, a shareholder at Ackermann & Tilajef, P.C. and a practicing attorney for
14 the past fourteen (14) years, worked a total of 40.75 hours on the case. Mr. Kreitenberg was admitted to
15 the State Bar of California in 2009 and the State Bar of Washington State in 2018. Prior to joining my
16 firm as a senior associate, Avi Kreitenberg worked for a different plaintiff's side law firm focusing on
17 complex litigation and class actions in Los Angeles. Based on his experience, Mr. Kreitenberg's billing
18 rate is \$764 per hour and his billing rate has been approved by courts in numerous class action settlements.
19 For the instant case, Mr. Kreitenberg participated in drafting the settlement agreement, drafting the
20 motion for preliminary approval, and drafting this declaration in support of final approval.

21 16. Jaclyn Blackwell is a legal assistant with Ackermann & Tilajef, P.C. Ms. Blackwell has
22 ten (10) years of experience as a legal assistant working on complex litigation and class actions, and spent
23 14.93 hours on the case at a rate of \$200 per hour. Ms. Blackwell participated in all administrative tasks
24 related to the case including gathering time and costs for the preliminary and final approval motions.

25 17. Our co-counsel and our firm sought to efficiently manage, staff, assign, and divide the
26 work between their respective attorneys and to avoid duplication of effort. To date, my office has
27 expended no less than **79.98** hours in connection with this case.

28 ///

Attorneys' Fees

18. Whereas proceeding with litigation would impose significant risk of no recovery as well as ongoing, substantial additional expenditures of time and resources, the settlement achieved confers a benefit on Plaintiffs and Class Members. If settlement were not achieved, continued litigation of the claims would take substantial time and possibly confer no benefit on Class Members. By contrast, the settlement will yield a prompt, certain, and substantial recovery for Class Members, which also benefits the parties and the Court. Counsel on both sides share the view that this is a fair and reasonable settlement in light of Defendant's defenses to Plaintiffs' claims and damages calculations, as fully discussed in Plaintiffs' extensive briefing in support of preliminary and final approval of the Settlement.

19. Given the risks inherent in litigation and the defenses asserted, both to certification and the merits, as well as the results of the class notice process, I believe that this Settlement is fair, adequate, and reasonable and in the best interests of Class Members. Moreover, continued litigation would be costly, time consuming, and uncertain in outcome. By contrast, the Settlement ensures timely relief and substantial recovery of the unpaid wages, premiums, reimbursement and penalties Plaintiffs contend are owed to the Class.

20. Through my practice, I have gained significant experience regarding the obligations and burdens of representing a class. This knowledge has allowed me and my firm, Ackermann & Tilajef, P.C., to successfully represent plaintiffs in many class actions in the past years. As noted here and in detail in my Preliminary Approval Declaration and herein, numerous state and federal courts in California, including this Court on multiple occasions, have found that my firm and my co-counsel to be competent and capable of representing large classes similar to the one here, both in the context of settlement and in the context of contested class certification motions.

21. Under the terms of the Settlement Agreement, Class Counsel (three different law firms) are collectively requesting up to \$1,566,666.66 in attorneys' fees for the firms representing the Class. This amount is equal to one-third of the common fund agreed upon by the parties as the Settlement amount. This fee amount is fair, reasonable, and similar to awards we have obtained in similar class action cases approved by courts in California. This percentage is also in line with (or lower than) the contingency fee that my firm would likely have agreed to with individual Class members if such

1 agreements were possible. Moreover, if it becomes necessary to litigate this matter further, my firm and
2 our co-counsel have the financial resources and are prepared to devote whatever time and effort are
3 required to zealously advocate on behalf of Plaintiffs and the Class.

4 22. The following table summarizes the time that each timekeeper at our firm expended on
5 this case through the present date at rates that have been approved by California state and federal Courts:

<i>Ackermann & Tilajef, P.C. Lodestar Summary</i>				
Timekeeper	Years	Hours	Rate	Total
Craig J. Ackermann, Esq.	25	17.8	\$919	\$16,358.20
Avi Kreitenberg, Esq.	14	46.35	\$764	\$35,411.40
Jaclyn Blackwell, Legal Asst.	10	15.83	\$200	\$3,166.67
TOTALS		79.98		\$54,936.27

6
7
8
9
10 23. Authenticated copies of the contemporaneous time records maintained by Ackermann &
11 Tilajef, P.C. for the services performed in this case are attached hereto as **Exhibit 1**.

12 24. We anticipate spending some additional time between now and the conclusion of this
13 matter in connection with, inter alia, corresponding with, and communicating with the settlement
14 administrator and opposing counsel throughout the remainder of the settlement administration process,
15 and a number of other tasks.

16 *A&T Costs*

17 25. To date our firm has incurred **\$4,928.22** in actual litigation costs in connection with this
18 case, as detailed in **Exhibit 2** attached hereto. The bulk of these costs were incurred in connection with
19 mediation fees.

20 26. The fee splitting agreement between Plaintiffs' counsel is as follows: 50% to James
21 Hawkins, APLC, 25% to Ackermann & Tilajef, P.C., and 25% to Melmed Law Group P.C. The named
22 Plaintiffs have approved the aforementioned fee-splitting agreement in writing.

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

25 Executed on September 13, 2023 in Beverly Hills, California.

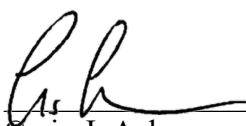
26 By: 
27 Craig J. Ackermann, Esq.
28

EXHIBIT 1

Client Time By Project

[Print](#) | [Close Window](#)
Client: Forever 21 - 720 Time Date Range: 1/1/2001 through 1/1/2051 [Refresh](#)

Date	Client Name	Project	Description	Net Hours	Rate	Amount	Invoiced	Uninvoiced
1/6/2023	Forever 21 - 720	Avi Kreitenberg	revising settlement agreement	3.80	\$764.00	\$2,903.20	\$0.00	\$2,903.20
1/10/2023	Forever 21 - 720	Avi Kreitenberg	reviewing cocounsel SA redline, revising class notice	0.70	\$764.00	\$534.80	\$0.00	\$534.80
1/24/2023	Forever 21 - 720	Avi Kreitenberg	call with OPC re settlement agreement	0.80	\$764.00	\$611.20	\$0.00	\$611.20
2/7/2023	Forever 21 - 720	Avi Kreitenberg	reviewing OPC redline on agreement, notice, and PA order	0.60	\$764.00	\$458.40	\$0.00	\$458.40
2/13/2023	Forever 21 - 720	Avi Kreitenberg	revising settlement agreement and class notice	0.20	\$764.00	\$152.80	\$0.00	\$152.80
2/15/2023	Forever 21 - 720	Avi Kreitenberg	drafting PAM papers	9.20	\$764.00	\$7,028.80	\$0.00	\$7,028.80
2/16/2023	Forever 21 - 720	Avi Kreitenberg	drafting PAM papers	4.20	\$764.00	\$3,208.80	\$0.00	\$3,208.80
2/17/2023	Forever 21 - 720	Avi Kreitenberg	drafting PAM papers	1.00	\$764.00	\$764.00	\$0.00	\$764.00
2/21/2023	Forever 21 - 720	Avi Kreitenberg	drafting PAM papers	4.80	\$764.00	\$3,667.20	\$0.00	\$3,667.20
3/1/2023	Forever 21 - 720	Avi Kreitenberg	reviewing cocounsel redline on PAM	0.40	\$764.00	\$305.60	\$0.00	\$305.60
3/7/2023	Forever 21 - 720	Avi Kreitenberg	revising PAM papers with OPC redline	1.50	\$764.00	\$1,146.00	\$0.00	\$1,146.00
3/8/2023	Forever 21 - 720	Avi Kreitenberg	revising PAM papers, reviewing cocounsel PAM decls	1.80	\$764.00	\$1,375.20	\$0.00	\$1,375.20

4/20/2023	Forever 21 - 720	Avi Kreitenberg	prep for PAH	1.00	\$764.00	\$764.00	\$0.00	\$764.00
4/20/2023	Forever 21 - 720	Avi Kreitenberg	meeting with CJA and ES re case update	1.40	\$764.00	\$1,069.60	\$0.00	\$1,069.60
4/21/2023	Forever 21 - 720	Avi Kreitenberg	PAH appearance	0.60	\$764.00	\$458.40	\$0.00	\$458.40
5/4/2023	Forever 21 - 720	Avi Kreitenberg	drafting stip amending PAO nunc pro tunc	1.70	\$764.00	\$1,298.80	\$0.00	\$1,298.80
5/11/2023	Forever 21 - 720	Avi Kreitenberg	approving class notice and administration timeline	0.10	\$764.00	\$76.40	\$0.00	\$76.40
6/7/2023	Forever 21 - 720	Avi Kreitenberg	reviewing administrators calculations	0.10	\$764.00	\$76.40	\$0.00	\$76.40
7/31/2023	Forever 21 - 720	Avi Kreitenberg	drafting brief re OSC	0.50	\$764.00	\$382.00	\$0.00	\$382.00
8/14/2023	Forever 21 - 720	Avi Kreitenberg	411 emails on case (1 min per)	6.85	\$764.00	\$5,233.40	\$0.00	\$5,233.40
8/15/2023	Forever 21 - 720	Avi Kreitenberg	drafting CJA fees declaration	1.10	\$764.00	\$840.40	\$0.00	\$840.40
8/22/2023	Forever 21 - 720	Avi Kreitenberg	revising fees declaration	0.20	\$764.00	\$152.80	\$0.00	\$152.80
9/5/2023	Forever 21 - 720	Avi Kreitenberg	revising cocounsel drafts of fees motion	3.80	\$764.00	\$2,903.20	\$0.00	\$2,903.20
PROJECT TOTAL				46.35		\$35,411.40	\$0.00	\$35,411.40
9/13/2021	Forever 21 - 720	Craig J. Ackermann	Call w/ Melmed re JPA w/ Hawkins	0.30	\$919.00	\$275.70	\$0.00	\$275.70
2/20/2023	Forever 21 - 720	Craig J. Ackermann	Emails re long-form and PAM	0.30	\$919.00	\$275.70	\$0.00	\$275.70
2/20/2023	Forever 21 - 720	Craig J. Ackermann	Began editing P's PAM	1.60	\$919.00	\$1,470.40	\$0.00	\$1,470.40
2/21/2023	Forever 21 - 720	Craig J. Ackermann	Continued edits to PAM papers; meeting w/ AK re same	1.50	\$919.00	\$1,378.50	\$0.00	\$1,378.50
4/24/2023	Forever 21 - 720	Craig J. Ackermann	Reviewed prelim approval order + timeline	0.30	\$919.00	\$275.70	\$0.00	\$275.70

5/4/2023	Forever 21 - 720	Craig J. Ackermann	Edits to stip + order nunc pro tunc re schedule for filing FAM + Fees Mtn; emails re stip + order + FAM date	1.00	\$919.00	\$919.00	\$0.00	\$919.00
5/30/2023	Forever 21 - 720	Craig J. Ackermann	Emails to co-counsel re DLSE ruling re injunctive relief in lieu of PAGA penalties	0.30	\$919.00	\$275.70	\$0.00	\$275.70
8/14/2023	Forever 21 - 720	Craig J. Ackermann	624 emails one case (1 min per)	10.40	\$919.00	\$9,557.60	\$0.00	\$9,557.60
9/8/2023	Forever 21 - 720	Craig J. Ackermann	Review and edit FAM/Fees Motion papers; emails re same	2.10	\$919.00	\$1,929.90	\$0.00	\$1,929.90
PROJECT TOTAL				17.80		\$16,358.20	\$0.00	\$16,358.20
9/17/2020	Forever 21 - 720	Jaclyn Blackwell	Received signed retainer for new case; opened file across the board for firm; organized docs	0.35	\$200.00	\$70.00	\$0.00	\$70.00
10/5/2020	Forever 21 - 720	Jaclyn Blackwell	Updated file, MCL, and calendar re co-counsel service of PAGA Notice	0.10	\$200.00	\$20.00	\$0.00	\$20.00
12/7/2020	Forever 21 - 720	Jaclyn Blackwell	Updated file & MCL re conformed copies of S&C	0.20	\$200.00	\$40.00	\$0.00	\$40.00
3/9/2021	Forever 21 - 720	Jaclyn Blackwell	Updated file, MCL, and calendar re co-counsel service of discovery requests to Def, Set One	0.10	\$200.00	\$20.00	\$0.00	\$20.00
3/12/2021	Forever 21 - 720	Jaclyn Blackwell	Updated file & calendar re D's Notice of P's Depo; emails re same	0.10	\$200.00	\$20.00	\$0.00	\$20.00
7/20/2021	Forever 21 - 720	Jaclyn Blackwell	Updated file & calendar re co-counsel service of P's MTC SRoggs + MTC RFPDs	0.10	\$200.00	\$20.00	\$0.00	\$20.00
10/20/2021	Forever 21 - 720	Jaclyn Blackwell	Rc'd mediation paperwork; updated file & calendar	0.20	\$200.00	\$40.00	\$0.00	\$40.00
2/10/2022	Forever 21 - 720	Jaclyn Blackwell	Receipt of further mediation docs; printed & paid invoice; updated file & calendar re same	0.35	\$200.00	\$70.00	\$0.00	\$70.00
3/1/2022	Forever 21 - 720	Jaclyn Blackwell	Updated/reorganized file & MCL re conformed copies of S&C for INDIV case	0.30	\$200.00	\$60.00	\$0.00	\$60.00

4/3/2022	Forever 21 - 720	Jaclyn Blackwell	Signed & returned Stip re Mediation Confidentiality for CJA	0.05	\$200.00	\$10.00	\$0.00	\$10.00
1/5/2023	Forever 21 - 720	Jaclyn Blackwell	Met w/ CJA & AK re next steps / status of MLG review of docs	0.25	\$200.00	\$50.00	\$0.00	\$50.00
1/18/2023	Forever 21 - 720	Jaclyn Blackwell	Review of emails between counsel; updated file with current drafts of indiv SA; updated tasks' list	0.10	\$200.00	\$20.00	\$0.00	\$20.00
1/23/2023	Forever 21 - 720	Jaclyn Blackwell	Updated file; calendared call for AK w/ conference line	0.15	\$200.00	\$30.00	\$0.00	\$30.00
1/25/2023	Forever 21 - 720	Jaclyn Blackwell	Rc'd, scanned, & saved FAC + POS mail service copy from co-counsel; updated AK & CJA	0.10	\$200.00	\$20.00	\$0.00	\$20.00
2/14/2023	Forever 21 - 720	Jaclyn Blackwell	Emails w/ attorneys re indiv settlement payment; drafted tax letter; prepared FedEx label; printed and delivered all docs + checks; sent email to client re same; internal emails re final SA & drafting of PAM	1.35	\$200.00	\$270.00	\$0.00	\$270.00
2/20/2023	Forever 21 - 720	Jaclyn Blackwell	Work on compiling signatures to SA per AK; submitted fully-executed SA to LWDA under Fowler; review of Benson docket & PAH date; paid for & pulled signed order re PAH date; emails re same; updated file	0.50	\$200.00	\$100.00	\$0.00	\$100.00
2/23/2023	Forever 21 - 720	Jaclyn Blackwell	Updated file re Req for Dismissal of separate/indiv case; review of docket re hearing next week	0.10	\$200.00	\$20.00	\$0.00	\$20.00
3/1/2023	Forever 21 - 720	Jaclyn Blackwell	Checked Benson docket again; emails to attorneys re PAH date; file update	0.10	\$200.00	\$20.00	\$0.00	\$20.00
3/9/2023	Forever 21 - 720	Jaclyn Blackwell	Updated calendar & receivables re new PAH / PAM dates	0.15	\$200.00	\$30.00	\$0.00	\$30.00
3/10/2023	Forever 21 - 720	Jaclyn Blackwell	Finalized PAM docs, captions, and exhibits; printed & prepared labels for mail service copies; sent email	2.00	\$200.00	\$400.00	\$0.00	\$400.00

			service to counsel; sent docs to FL for efilng; updated file, calendar, & tasks						
3/15/2023	Forever 21 - 720	Jaclyn Blackwell	Search for service copy of revised FAC; revised caption pages of all moving papers per clerk rejection; email to OPC re acceptance of eservice; efiled & eserved	1.35	\$200.00	\$270.00	\$0.00	\$270.00	
3/20/2023	Forever 21 - 720	Jaclyn Blackwell	Rc'd, renamed/saved, and circulated conformed PAM docs	0.30	\$200.00	\$60.00	\$0.00	\$60.00	
4/24/2023	Forever 21 - 720	Jaclyn Blackwell	Rc'd prelim approval order; updated file & tasks; detailed email to CPT & all counsel w/ attachments & instructions	0.30	\$200.00	\$60.00	\$0.00	\$60.00	
4/25/2023	Forever 21 - 720	Jaclyn Blackwell	Updated file & calendar re "brief" admin timeline from CPT	0.25	\$200.00	\$50.00	\$0.00	\$50.00	
4/27/2023	Forever 21 - 720	Jaclyn Blackwell	Prepared, served, & efiled A&T Notice of Change of Address	0.30	\$200.00	\$60.00	\$0.00	\$60.00	
5/3/2023	Forever 21 - 720	Jaclyn Blackwell	Review of PAO and FAM / Fees Motion deadline issue	0.10	\$200.00	\$20.00	\$0.00	\$20.00	
5/8/2023	Forever 21 - 720	Jaclyn Blackwell	Updated file, calendar, & receivables re detailed admin / funding / disbursement timeline from CPT + draft class notice	0.30	\$200.00	\$60.00	\$0.00	\$60.00	
5/9/2023	Forever 21 - 720	Jaclyn Blackwell	Pulled conformed Ntc of Change of Address; updated file & starred emails	0.05	\$200.00	\$10.00	\$0.00	\$10.00	
5/16/2023	Forever 21 - 720	Jaclyn Blackwell	Finalized clean versions of Stip & Proposed Order to Amend PAO; prepared POS; efiled & eserved; marked for f/u on signed order; rc'd & scanned in Notice of Entry of PAO from co-counsel	0.40	\$200.00	\$80.00	\$0.00	\$80.00	
6/16/2023	Forever 21 - 720	Jaclyn Blackwell	Review of co-counsel email & online ROA; response email; updated file w/ weekly report	0.15	\$200.00	\$30.00	\$0.00	\$30.00	

6/21/2023	Forever 21 - 720	Jaclyn Blackwell	Updated file, tasks, & team re signed order on Stip to Amend PAO (to clarify FAM filing date)	0.10	\$200.00	\$20.00	\$0.00	\$20.00
7/28/2023	Forever 21 - 720	Jaclyn Blackwell	Updated file re Weekly Report; review of emails to confirm who is drafting FAM; email to Hawkins firm re same	0.15	\$200.00	\$30.00	\$0.00	\$30.00
7/31/2023	Forever 21 - 720	Jaclyn Blackwell	Receipt of Min Order re Fowler case in mail; scanned & saved; updated calendar	0.20	\$200.00	\$40.00	\$0.00	\$40.00
8/7/2023	Forever 21 - 720	Jaclyn Blackwell	Call w/ class member; review notice	0.10	\$200.00	\$20.00	\$0.00	\$20.00
8/14/2023	Forever 21 - 720	Jaclyn Blackwell	466 emails on case (30 secs per)	3.88	\$200.00	\$776.67	\$0.00	\$776.67
8/14/2023	Forever 21 - 720	Jaclyn Blackwell	Gathered firm time & costs for FAM papers; emails w/ attorneys re same	0.45	\$200.00	\$90.00	\$0.00	\$90.00
8/15/2023	Forever 21 - 720	Jaclyn Blackwell	Finalized, served, and filed Brief Re Status of SD Action + POS re same	0.35	\$200.00	\$70.00	\$0.00	\$70.00
8/25/2023	Forever 21 - 720	Jaclyn Blackwell	Review of weekly report & saved to file; emails to all Plfs' counsel re finalizing draft within a week of FAM due date	0.10	\$200.00	\$20.00	\$0.00	\$20.00
9/1/2023	Forever 21 - 720	Jaclyn Blackwell	Update file & tasks re draft FAM & Fees Mtn from co-counsel; emails re same	0.10	\$200.00	\$20.00	\$0.00	\$20.00
9/7/2023	Forever 21 - 720	Jaclyn Blackwell	Printed & organized FAM & Fees drafts for CJA desk/review; emails re same	0.25	\$200.00	\$50.00	\$0.00	\$50.00
PROJECT TOTAL				15.83		\$3,166.67	\$0.00	\$3,166.67
GRAND TOTAL				79.98		\$54,936.27	\$0.00	\$54,936.27

EXHIBIT 2

Expense List

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Date	Client Name	Project	Type	Description	Quantity	Unit Amount	Amount
2/10/2022	Forever 21 - 720	Craig J. Ackermann	Mediation	Dickstein Dispute Resolution - A&T's portion (1/3) of P's portion (1/2) of mediation fees			\$4,333.33
2/10/2022	Forever 21 - 720	Craig J. Ackermann	Postage/Mailing	Postage to mail check for mediation fees			\$0.58
2/14/2023	Forever 21 - 720	Craig J. Ackermann	Postage/Mailing	FedEx - overnight to client			\$37.34
2/20/2023	Forever 21 - 720	Craig J. Ackermann	Document Purchases	San Diego Superior Court - fee to pull signed order on Stip to Continue PAH Date from docket			\$5.80
3/10/2023	Forever 21 - 720	Craig J. Ackermann	Filing Fees - Pleadings	First Legal - attempted efile of PAM docs; rejected due to caption issue			\$38.75
3/10/2023	Forever 21 - 720	Craig J. Ackermann	Postage/Mailing	USPS - priority mail service of PAM docs on all counsel			\$38.60
3/15/2023	Forever 21 - 720	Craig J. Ackermann	Filing Fees - Pleadings	First Legal - efile/conform/return PAM docs			\$101.15
4/3/2023	Forever 21 - 720	Craig J. Ackermann	Postage/Mailing	Postage to mail check to First Legal re PAM Filing			\$0.63
5/9/2023	Forever 21 - 720	Craig J. Ackermann	Filing Fees - Pleadings	OneLegal - efile/conform/return A&T Notice of Change of Address			\$13.33
6/21/2023	Forever 21 - 720	Craig J. Ackermann	Filing Fees - Pleadings	OneLegal - efile/conform/return Stip to Amend PAO			\$42.16
8/15/2023	Forever 21 - 720	Craig J. Ackermann	In-house copying	853 pages x .35 each			\$298.55
8/15/2023	Forever 21 - 720	Craig J. Ackermann	Filing Fees - Pleadings	ANTICIPATED - OneLegal - efile/conform/return Brief re Status of San Diego Action in Fowler v. F21 LASC Action			\$18.00

TOTALS

\$4,928.22
