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Attorneys for Plaintiffs and the Class

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

MARITZA TORRES, ANNETTE OLVERA
NUNEZ, individually, and on
behalf of other members of the general public
similarly situated; JESSICA SALGADO,
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.

CLINICA SIERRA VISTA, a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: BCV-19-101966

Honorable Bernard C. Barmann
Department H
1215 Truxton Ave. Bakersfield, CA 93301

CLASS ACTION

**DECLARATION OF HELENE MAYER IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
ENHANCEMENT PAYMENTS**

[Plaintiffs' Motion for Final Approval of Class
Action and PAGA Settlement, Attorneys' Fees
and Costs, and Enhancement Payments;
Declarations of Class Representatives (Maritza
Torres, Annette Olvera Nunez, and Jessica
Salgado); Declaration of Settlement
Administrator (Lindsay Romo of Simpluris,
Inc.); and [Proposed] Final Approval Order
and Judgment filed concurrently herewith]

Date: April 14, 2025
Time: 8:30 a.m.
Department: H

Complaint Filed: July 16, 2019
FAC Filed: January 21, 2020
SAC Filed: February 20, 2022
Trial Date: None Set

DECLARATION OF HELENE MAYER

I, Helene Mayer, 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 Plaintiff Maritza Torres, Plaintiff Annette Olvera Nunez, and Plaintiff Jessica Salgado (collectively, “Plaintiffs”) and the Class in the above-captioned action. 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 thereto.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On November 7, 2024, in Department H of the above-entitled Court, the Honorable Bernard C. Barmann preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between the Plaintiffs and Defendant Clinica Sierra Vista (“Defendant”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Maritza Torres, Annette Olvera Nunez, and Jessica Salgado to represent the Class (“Class Representatives”). The Court also preliminarily appointed Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Court Approved Notice of Proposed Settlement of Class Action and Hearing Date for Final Approval (“Class Notice”), and adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Simpluris, Inc. (“Simpluris” or “Settlement Administrator”) to serve as the third-party administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action and PAGA Settlement, Attorneys’ Fees and Costs, and Enhancement Payments (“Motion for Final Approval”), no Class Members have objected to the Settlement or the request for Attorneys’ Fees and Costs, Enhancement Payments, Settlement Administration Costs, or allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

WORK PERFORMED BY LAWYERS for JUSTICE, PC

4. Several attorneys at Lawyers for Justice, PC have been actively engaged in litigating the above-captioned action since prior to its commencement on July 16, 2019.

5. Before initiating the matter, Lawyers for Justice, PC conducted extensive investigation and research into 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, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to, *inter alia*, class certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement and penalties, Plaintiffs' claims and allegations, and potential defenses. After conducting initial investigation, Lawyers for Justice, PC determined that Plaintiffs' claims were well-suited for class-wide adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees of Defendant within the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed expenses.

6. The parties conducted extensive formal and informal discovery and investigated into the facts of the case, to assess the veracity, strength, and scope of the claims, and Class Counsel worked on preparing the case for class certification and trial, prior to reaching the Settlement. The parties exchanged information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations. Class Counsel reviewed and analyzed information, documents, and data obtained from Plaintiffs, Defendant, and other sources. Class Counsel propounded multiple sets of formal written discovery requests onto Defendant (specifically, Requests for Production of Documents, (Sets One & Two); Special Interrogatories, (Sets One, Two, & Three); and Form Interrogatories, (Set One)) and noticed of deposition of Defendant's Person Most Knowledgeable designees along with accompanying requests for production of documents. Class Counsel reviewed Defendant's responses and supplemental responses thereto. Class Counsel also responded to multiple discovery request propounded by Defendant (specifically, Requests for Production of Documents, (Set One); Special Interrogatories, (Set One);

1 Form Interrogatories – Employment Law, (Set One); and Form Interrogatories, (Set One)) on
2 Plaintiff Torres. The information, documents, and data reviewed and analyzed by Class Counsel
3 included, and were not limited to: Plaintiffs’ employment records, employment records of dozens
4 of other putative class members represented by Class Counsel, a detailed sampling of Class
5 Members’ time and pay data, Defendant’s Employee Handbook, job descriptions, new hire and
6 training documents and checklists, time sheets, pay stubs, earning statements, company policy
7 acknowledgements, Defendant’s operations and employment practices, and policies, among other
8 information and documents. Class Counsel had the opportunity to interview Plaintiffs and other
9 Class Members to gather facts and to identify potential witnesses. Counsel for the Parties also met
10 and conferred on numerous occasions, e.g., to discuss issues relating to the pleadings, discovery,
11 and the production of documents and data prior to the mediation. Class Counsel also engaged in
12 the *Belaire-West* Notice process, interviewed, prepared declarations for and analyzed records for
13 dozens of putative class members, and in all analyzed over 50,000 pages of documents and data.
14 Other work performed by Class Counsel included, and was not limited to, case strategy and
15 analysis; drafting, reviewing, and revising pleadings, the mediation brief, and settlement approval
16 motion papers; preparing and appearing for court proceedings, among other tasks.

17 7. As outlined herein, the parties conducted extensive formal and informal discovery
18 and investigation into the facts of the case, engaged in the *Belaire-West* Notice process, conducted
19 additional formal, and also conducted significant informal exchange of information, documents,
20 and data in preparation for mediation (producing over 50,000 pages of documents and data in
21 total). Class Counsel analyzed a volume of information, documents, and data obtained from
22 Plaintiffs, Defendant, and other sources, that provided a critical understanding of the nature of the
23 work performed by Class Members, as well as Defendant’s operations and employment policies,
24 practices, and procedures, and were used in analyzing liability, damages, and penalties valuation
25 issues in connection with multiple phases of the litigation, and ultimately in connection with the
26 mediation and settlement negotiation process. Class Counsel also performed research regarding
27 applicable law, which is evolving as it relates to class certification, and/or representative
28 adjudication, off-the-clock theory, meal and rest periods, representative PAGA claims and

1 penalties, wage-and-hour law and enforcement, Plaintiffs' claims and allegations, and Defendant's
2 defenses thereto, as well as facts discovered. Accordingly, sufficient investigation and review of
3 information has taken place in order for the parties to be adequately informed of the nature and
4 extent of the claims, and to enable all parties to fully evaluate the Settlement for its fairness,
5 adequacy, and reasonableness.

6 8. After conducting significant investigation of the facts and law during the prosecution
7 of the case, counsel for the parties engaged in extensive settlement negotiations to try to resolve
8 the case. These efforts included participating in a formal, full-day mediation conducted by Jeffrey
9 Krivis, Esq., a well-regarded mediator experienced in mediating complex labor and employment
10 matters. In the course of litigation and in connection with mediation and settlement discussions,
11 the parties exchanged additional information and data, and discussed various aspects of the case,
12 including and not limited to, the risks and delays of further litigation, the risks to the parties of
13 proceeding with class certification and trial, the law relating to class certification, representative
14 adjudication, manageability, off-the-clock theory, meal and rest periods, and representative PAGA
15 claims, wage-and-hour law and enforcement, as well as the evidence produced and analyzed, and
16 the possibility of appeals, among other things. Class Counsel also interviewed and prepared
17 declarations for dozens of putative class members. During all settlement discussions, the parties
18 conducted their negotiations at arm's length in an adversarial position. Arriving at a settlement
19 that was acceptable to the parties was not easy. Defendant and its counsel felt very strongly about
20 Defendant's ability to prevail on the merits, and to obtain a denial of class certification, while
21 Plaintiffs and Class Counsel believed that class certification would be obtained, and that Plaintiffs
22 would prevail at trial. After conducting formal and informal discovery and investigations and
23 extensive settlement negotiations, with the aid of the mediator's evaluation, the parties agreed that
24 the case was well-suited for settlement given the legal issues relating to Plaintiffs' principal claims,
25 as well as the costs and risks to the parties that would attend further litigation. These risks of
26 further litigation include, and are not limited to, a determination that the claims are unsuitable for
27 class treatment and/or representative adjudication, class de-certification after certification of a
28 class, allowing a jury to decide the claims, and the real possibility of no monetary recovery after

1 years of litigation. The Settlement takes into account the strengths and weaknesses of each side's
2 position and the uncertainty of how the case might have concluded at certification, trial, and/or
3 appeals.

4 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
5 attorneys' fees in the amount of \$1,520,000.00, which is 38% of the Total Settlement Amount of
6 \$4,000,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiffs
7 and Lawyers *for* Justice, PC, Plaintiffs have agreed to a contingency fee of at least 38% of the
8 recovery.

9 10. The attorneys' fees that are sought are commensurate with: (1) the risk that Class
10 Counsel took in commencing the case; (2) the time, effort, and expense that Class Counsel
11 dedicated to the case; (3) the skill and determination that Class Counsel has shown; (4) the results
12 that Class Counsel has achieved throughout the litigation of the case; (5) the value of the settlement
13 that Class Counsel has achieved; and (6) the other cases that Class Counsel has turned down in
14 order to devote their time and efforts to the case. The nature of the work performed, skill exercised,
15 and the outcome in this matter support the percentage fee sought.

16 11. While not necessarily required to be demonstrated because the percentage fee is
17 proper for this settlement, Class Counsel has incurred many hours of work in connection with
18 prosecuting the case, such that the award of attorneys' fees is also justified under a lodestar
19 analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **868.20 hours** performing tasks
20 and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and
21 Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers
22 *for* Justice, PC, and the time incurred in performing those services. The hours include work done
23 by myself and several other attorneys at Lawyers *for* Justice, PC. Additionally, separate from the
24 hours of work referenced herein and in the attached chart, Lawyers *for* Justice, PC had litigation
25 support personnel actively engaged in assisting with the prosecution of this matter.

26 12. The work performed in this matter, the background of Lawyers *for* Justice, PC, as
27 well as the individual backgrounds, training, and experience of the attorneys who worked on this
28 matter, in litigating complex wage-and-hour cases, and in particular, employment class actions

1 and representative actions, support a reasonable blended hourly rate of compensation at the rate of
2 at least \$850 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC
3 has been awarded attorneys’ fees, compensating the firm at the rate of at least \$850 per hour for
4 legal services performed, by courts granting approval of settlements in other wage-and-hour class
5 action and/or representative action cases: final approval of the class and representative action
6 settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No.
7 19STCV01591) was granted on July 8, 2021, and the award of attorneys’ fees involved
8 compensation at the rate of \$936.47 per hour; final approval of the class and representative action
9 settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No.
10 BC715157) was granted on April 20, 2021, and the award of attorneys’ fees involved
11 compensation at the rate of \$919.57 per hour; and final approval of the class and representative
12 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.
13 SCV258764) was granted on February 6, 2019, and the award of attorneys’ fees involved
14 compensation at the rate of \$855.96 per hour.

15 **EXPERIENCE AND ADEQUACY OF**
16 **LAWYERS *for* JUSTICE, PC**

17 13. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
18 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
19 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is
20 attorney of record in dozens of employment-related putative class actions in both state and federal
21 courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on
22 litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”)
23 representative actions. The firm has successfully litigated cases involving nearly every aspect of
24 California wage and hour law, including payment of overtime and minimum wages, provision of
25 meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of
26 compliant wage statements, reimbursement of business expenses, executive, administrative, and
27 other overtime exemptions to the State of California and federal overtime compensation
28 requirements, PAGA claims, and sister statutes under federal law. Lawyers for Justice, PC has

1 recovered (sometimes in association with other law firms) millions of dollars on behalf of
2 thousands of individuals in California.

3 14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice,
4 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
5 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
6 extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute
7 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
8 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October
9 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During
10 the summer of 2000, he studied Legal Writing at Harvard University. From approximately
11 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable
12 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From
13 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the
14 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
15 In December of 2004, he obtained a license to practice law from the California State Bar. Since in
16 or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively
17 focused on the prosecution of consumer and employment class actions. While employed by
18 Lawyers *for* Justice PC, he has argued over 100 motions, taken or defended over 150 depositions,
19 prepared dozens of expert witnesses for deposition or trial, and attended over 175 mediations.
20 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he
21 has successfully litigated cases involving the executive, administrative, and other overtime
22 exemptions to the State of California and federal overtime compensation requirements. Under his
23 supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested
24 motion practice in approximately 15 cases in the last decade and litigated over 1,000 class action
25 or representative action cases.

26 15. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He
27 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
28 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.

1 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
2 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
3 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern
4 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.
5 He was admitted to practice law in California in 2010. He is admitted to practice before all courts
6 of the State of California and all United States District Courts in the State of California. He has
7 worked on many wage-and-hour class action and representative action cases, taking the lead in
8 taking and defending depositions, arguing motions, and attending mediations. He has played an
9 integral role in preparing matters for class certification, including and not limited to, successful
10 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.
11 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
12 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
13 RG13680477). Under his supervision, dozens of class action or representative cases have resulted
14 in settlements that have been granted court approval. He has handled over 150 mediations and
15 worked on over 250 class action or representative action cases which have resulted in settlement.

16 16. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a
17 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
18 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
19 Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010)
20 and in New York (since 2013) and is also admitted to practice in all U.S. District Courts in
21 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme
22 Court. She has taken and defended dozens of depositions and successfully handled motion practice
23 in class action cases regarding discovery (including and not limited to, regarding class contact
24 information), class certification (both contested class certification and stipulated class
25 certification), arbitration agreements, coordination, and intervention. She has successfully handled
26 briefing and oral argument on appeal and obtained notable decisions regarding Private Attorneys
27 General Act claims and employer efforts to compel arbitration of such claims, e.g., *Betancourt v.*
28 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal.,

May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th 175 (2019). She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class action and/or representative action settlements, and has handled this process in over 300 cases. Under her, Edwin Aiwazian, Arby Aiwazian's supervision, Lawyers for Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. She is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

17. I, Helene Mayer, am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree from University of San Diego in 2017, and I earned my Juris Doctor degree from University of San Diego School of Law in 2020. I was admitted to practice law in California in 2021. I am admitted to practice before all courts of the State of California and all U.S. Federal District Courts in the State of California. I have worked on wage-and-hour class action and PAGA representative cases, and my work has included, inter alia, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, and making court appearances. Prior to working at Lawyers for Justice, PC, I worked at law firms focused primarily on family law matters, including, inter alia, representing clients in divorce, parentage, child custody, and domestic violence restraining order proceedings, researching and drafting pleadings, negotiating and finalizing marital settlement agreements, engaging in motion practice, and making court appearances.

LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS FOR JUSTICE, PC

18. To date, Lawyers for Justice, PC has borne all of the risks and costs of litigation and will not receive any compensation until a recovery is obtained in this matter. Lawyers for Justice,

PC seeks reimbursement of **\$28,074.54** in litigation costs and expenses incurred in the case, as reflected in “**EXHIBIT B**” attached hereto. These expenses were reasonable and necessary in the prosecution of the case and to obtain the Settlement.

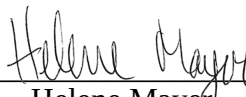
ENHANCEMENT PAYMENTS TO PLAINTIFFS

19. In recognition of their efforts and work expended in the case and serving as Class Representatives, Plaintiffs each seek an Enhancement Payment in the amount of \$7,500.00, for a total of \$22,500.00. The requested Enhancement Payments are fair and appropriate. Plaintiffs spent a substantial amount of time and effort in providing relevant documents, past employment records, and the facts and evidence necessary to attempt to prove the allegations in the case. For example, Plaintiff Torres expended effort to review and provide responses to multiple sets of discovery requests that were propounded by Defendant. Plaintiffs were available whenever their attorneys needed them and actively tried to obtain and provide information that would facilitate the pursuit of the claims. Accordingly, it is appropriate and just for Plaintiffs to each receive \$7,500.00 as a reasonable Enhancement Payment for their services performed in the matter.

20. I submit that the settlement is fair, reasonable, and adequate, and in the best interests of Plaintiffs, Class Members, PAGA Employees, and the State of California.

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

Executed this 12th day of March 2025, at Mooresville, North Carolina.



Helene Mayer

EXHIBIT A

MARITZA TORRES, ET AL. V. CLINICA SIERRA VISTA (“LEAD ACTION”)
Kern County Superior Court, Case No. BCV-19-101966

JESSICA SALCEDO, ET AL. V. CLINICA SIERRA VISTA (“SALCEDO CLASS ACTION”)
Kern County Superior Court, Case No. BCV-21-101800

JESSICA SALCEDO V. CLINICA SIERRA VISTA (“SALCEDO PAGA ACTION”)
Kern County Superior Court, Case No. BCV-21-102231

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Maritza Torres (“Plaintiff Torres”) during the Case	15.50
Meet and Communicate with Plaintiff Jessica Salcedo (“Plaintiff Salcedo”) during the Case	11.10
Meet and Communicate with Plaintiff Annette Olvera Nunez (“Plaintiff Nunez”) during the Case	10.50
Investigate, Communicate with, and/or Interview Putative Class Members and Percipient Witnesses	68.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Torres’ Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft, Review, and/or Revise Plaintiff Torres’ Class Action Complaint for Damages (filed on July 16, 2019) (Lead Action)	9.60

Review Court's Notice of Assignment to Judge for All Purposes and Notice of Order to Show Cause Regarding CRC Rule 3.110 and Notice of Case Management Conference (issued on July 17, 2019) (Lead Action)	0.20
Review and Analyze Defendant's Answer to Plaintiff Torres' Class Action Complaint for Damages (served on August 15, 2019), and Research Affirmative Defenses in Defendant's Answer (Lead Action)	1.50
Draft, Review, and/or Revise Plaintiff Torres' Notice of Posting Jury Fees (filed on August 26, 2019) (Lead Action)	0.10
Draft, Review, and/or Revise Plaintiff Torres' Case Management Statement (filed on December 23, 2019) (Lead Action)	1.20
Review Defendant's Case Management Statement (filed on December 27, 2019) (Lead Action)	0.20
Review Court's Minute Order Re: Case Management Conference (issued on January 13, 2020) (Lead Action)	0.10
Draft, Review, and/or Revise Plaintiff Torres' First Amended Class Action Complaint for Damages (filed on January 21, 2020) (Lead Action)	6.60
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation Granting Plaintiff Torres Leave to File First Amended Complaint; [Proposed] Order Thereon (submitted on January 21, 2020) (Lead Action)	0.90
Review Court's Order Granting Joint Stipulation Granting Plaintiff Torres Leave to File First Amended Complaint (issued on January 21, 2020) (Lead Action)	0.10
Draft, Review, and/or Revise Plaintiff Torres' Notice of Entry of Order Granting Joint Stipulation Granting Plaintiff Torres Leave to File First Amended Complaint (filed on January 23, 2020) (Lead Action)	0.20

Draft, Review, and/or Revise Plaintiff Torres' Notice of Posting Complex Fee (filed on February 10, 2020) (Lead Action)	0.10
Draft, Review, and/or Revise Plaintiff Torres' Case Management Statement (filed on March 4, 2020) (Lead Action)	1.10
Review Court's Minute Order Re: Continued Case Management Conference (issued on March 17, 2020) (Lead Action)	0.10
Review Court's Minute Order Re: Further Case Management Conference (issued on June 24, 2020) (Lead Action)	0.10
Review Defendant's Answer to Plaintiff Torres' First Amended Class Action Complaint for Damages and Research Affirmative Defenses in Defendant's Answer (filed on August 11, 2020) (Lead Action)	1.40
Review Defendant's Notice of Unavailability of Counsel (served on August 27, 2020) (Lead Action)	0.10
Draft, Review, and/or Revise Plaintiff Torres's Case Management Statement (filed on October 9, 2020) (Lead Action)	1.10
Review Defendant's Case Management Statement (filed on October 13, 2020) (Lead Action)	0.20
Review Court's Minute Order Re: Further Case Management Conference (issued on October 22, 2020) (Lead Action)	0.10
Review Court's Notice of Assignment for All Purposes (filed on December 4, 2020) (Lead Action)	0.10
Review Defendant's Case Management Statement (filed on January 7, 2020) (Lead Action)	0.20
Review Court's Minute Order Re: Further Case Management Conference (issued on January 21, 2021) (Lead Action)	0.10

Draft, Review, and/or Revise Plaintiff Torres' Notice Regarding January 21 Further Case Management Conference (filed on January 26, 2021) (Lead Action)	0.30
Review Defendant's Notice of Unavailability of Counsel (served on May 21, 2021) (Lead Action)	0.10
Review Court's Notice of Reassignment to Judge for All Purposes (issued on June 24, 2021) (Lead Action)	0.10
Investigate the Merits of Plaintiff Salcedo's and Plaintiff Nunez's Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft, Review, and/or Revise Plaintiff Salcedo and Plaintiff Nunez's Class Action Complaint for Damages (filed on August 4, 2021) (<i>Salcedo</i> Class Action)	9.50
Review Court's Notice of Assignment to Judge for All Purposes and Notice of Order to Show Cause Regarding CRC Rule 3.110 and Notice of Case Management Conference (issued on August 5, 2021) (<i>Salcedo</i> Class Action)	0.20
Investigate the Merits of Plaintiff Salcedo's PAGA Claim, Conduct Legal Research and Analysis of PAGA Claim, and Draft, Review, and/or Revise Plaintiff Salcedo's Complaint for Enforcement under the Private Attorneys General Act, California Labor Code Section 2698, <i>et seq.</i> (filed on September 21, 2021) (<i>Salcedo</i> PAGA Action)	7.60
Review Court's Notice of Assignment to Judge for All Purposes and Notice of Order to Show Cause Regarding CRC Rule 3.110 and Notice of Case Management Conference (issued on September 24, 2021) (<i>Salcedo</i> PAGA Action)	0.20
Draft, Review, and/or Revise Plaintiff Torres' Case Management Statement (filed on October 5, 2021) (Lead Action)	1.10
Review Defendant's Case Management Statement (filed on October 6, 2021) (Lead Action)	0.50

Review Court's Minute Order Regarding Further Case Management Conference (issued on October 20, 2021) (Lead Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Extend Defendant's Responsive Pleading Deadline, [Proposed] Order Thereon (submitted on November 1, 2021) (<i>Salcedo</i> Class Action)	1.50
Review Court's Order Granting Joint Stipulation to Extend Defendant's Responsive Pleading Deadline (issued on November 2, 2021) (<i>Salcedo</i> Class Action)	0.10
Review Court's Minute Order Regarding Further Case Management Conference (issued on November 15, 2021) (Lead Action)	0.10
Review Defendant's Notice of Related Case (filed on November 23, 2021) (Lead Action)	0.10
Review Defendant's Notice of Related Case (filed on November 23, 2021) (<i>Salcedo</i> PAGA Action)	0.10
Review Defendant's Notice of Related Case (filed on November 24, 2021) (<i>Salcedo</i> Class Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on December 23, 2021) (Lead Action)	1.30
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (issued on December 27, 2021) (Lead Action)	0.10
Draft, Review, and/or Revise Plaintiff Salcedo and Plaintiff Nunez's Case Management Statement and Request for Continuance, Declaration of Talar DerOhannessian in Support of Thereof, [Proposed] Order Thereon (filed on January 21, 2022) (<i>Salcedo</i> Class Action)	1.80
Review Court's Order Granting Plaintiff Salcedo and Plaintiff Nunez's Request for Continuance (issued on January 25, 2022) (<i>Salcedo</i> Class Action)	0.20

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation Regarding the Filing of a Second Amended Complaint; [Proposed] Order (submitted on February 1, 2022) (Lead Action)	1.90
Review Court's Order Granting Joint Stipulation Regarding the Filing of a Second Amended Complaint (issued on February 10, 2022) (Lead Action)	0.20
Draft, Review, and/or Revise Plaintiffs' Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code (filed on February 10, 2022) (Lead Action)	7.50
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on February 15, 2022) (Lead Action)	1.20
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference; [Proposed] Order (issued on February 17, 2022) (Lead Action)	0.20
Draft, Review, and/or Revise Plaintiff Salcedo and Plaintiff Nunez's Request for Dismissal, Declaration of Edwin Aiwasian in Support Thereof, [Proposed] Order Thereon (filed on February 24, 2022) (<i>Salcedo</i> Class Action)	1.80
Draft, Review, and/or Revise Plaintiff Salcedo's Request for Dismissal (filed on February 24, 2022) (<i>Salcedo</i> PAGA Action)	0.30
Review Court's Order Granting Plaintiff Salcedo and Plaintiff Nunez's Request for Dismissal (issued on February 28, 2022) (<i>Salcedo</i> Class Action)	0.10
Draft, Review, and/or Revise Plaintiff's Notice of Entry of Order Granting Joint Stipulation to Continue Case Management Conference (filed on March 10, 2022) (Lead Action)	0.10

Draft, Review, and/or Revise Notice of Entry of Order Granting Joint Stipulation Regarding the Filing of a Second Amended Complaint (filed on March 15, 2022) (Lead Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on April 13, 2022) (Lead Action)	1.30
Review Defendant's Answer to Plaintiffs' Second Amended Class Action Complaint for Damages (filed on April 14, 2022) and Research Affirmative Defenses in Defendant's Answer (Lead Action)	1.50
Review Court's Granting Joint Stipulation to Continue Case Management Conference (issued on April 27, 2022) (Lead Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Case Management Conference; [Proposed] Order (submitted on May 2, 2022) (Lead Action)	1.20
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (issued on May 4, 2022) (Lead Action)	0.10
Review Defendant's Notice of Substitution of Attorney (filed on November 8, 2022) (Lead Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Further Case Management Conference; [Proposed] Order (submitted on February 21, 2023) (Lead Action)	1.30
Review Court's Order Granting Joint Stipulation to Continue Further Case Management Conference (issued on March 3, 2023) (Lead Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Stipulation and Protective Order—Confidential Designation Only (filed on June 28, 2023) (Lead Action)	2.50
Review Court's Order Granting Stipulation and Protective Order—Confidential Designation Only (issued on July 5, 2023) (Lead Action)	0.10

Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Further Case Management Conference; [Proposed] Order (submitted on October 5, 2023)	1.10
Review Court's Order Granting Joint Stipulation to Continue Further Case Management Conference (issued on October 16, 2023) (Lead Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on December 8, 2023) (Lead Action)	1.20
Review Court's Minute Order Re: Further Case Management Conference (issued on December 21, 2023) (Lead Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Extend Five-Year Deadline to Bring Case Trial; [Proposed] Order (submitted on February 13, 2024) (Lead Action)	2.10
Review Court's Order Granting Joint Stipulation to Extend Five-Year Deadline to Bring Case Trial (issued on February 21, 2024) (Lead Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on March 1, 2024) (Lead Action)	1.50
Review Court's Minute Order Regarding Further Case Management Conference (issued on March 20, 2024) (Lead Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Notice of Settlement (filed on April 16, 2024) (Lead Action)	1.20
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on July 3, 2024) (Lead Action)	1.30

Review Court's Minute Order Regarding Further Case Management Conference (issued on July 18, 2024) (Lead Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Case Management Statement (filed on September 30, 2024) (Lead Action)	1.30
Review Court's Minute Order Regarding Further Case Management Conference (issued on October 16, 2024) (Lead Action)	0.10
Meet and Confer with Defendant's Counsel, and Draft, Review, and/or Revise Joint Stipulation to Accept Prior Individual Settlement Agreements as Valid Requests For Exclusion From Settlement Class and [Proposed] Order to Accept Prior Individual Settlement Agreements as Valid Requests For Exclusion From Settlement Class (submitted on March 3, 2025) (Lead Action)	3.30
Appearances	
Prepare for, Travel to, and Attend Case Management Conference (Bakersfield, California) (January 13, 2020) (Lead Action)	4.40
Prepare for and Remotely Attend Further Case Management Conference (June 24, 2020) (Lead Action)	0.50
Prepare for and Remotely Attend Hearing on Plaintiff Torres' Notice of Motion and Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set One) Nos. 1 and 2 and Request for Monetary Sanctions (June 26, 2020) (Lead Action)	2.50
Prepare for and Remotely Attend Further Case Management Conference (October 22, 2020)	0.50
Prepare for and Remotely Attend Further Case Management Conference (January 21, 2021) (Lead Action)	0.50
Prepare for and Remotely Attend Further Case Management Conference (October 20, 2021) (Lead Action)	0.30

Prepare for and Remotely Attend Further Case Management Conference (December 21, 2023) (Lead Action)	0.50
Prepare for and Remotely Attend Further Case Management Conference (March 20, 2024) (Lead Action)	0.30
Prepare for and Remotely Attend Further Case Management Conference (July 18, 2024) (Lead Action)	0.70
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (November 7, 2018) (Lead Action)	2.50
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Maritza Torres (served on May 30, 2019)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Maritza Torres (served on June 14, 2019)	9.50
Draft, Review, and/or Revise Plaintiff Torres' 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 (served on August 27, 2019) (Lead Action)	6.50
Draft, Review, and/or Revise Plaintiff Torres' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; October 21, 2019) (served on August 27, 2019) (Lead Action)	2.10
Draft, Review, and/or Revise Plaintiff Torres' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; October 22, 2019) (served on August 27, 2019) (Lead Action)	2.30

Draft, Review, and/or Revise Plaintiff Torres' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Affirmative Defenses; October 23, 2019) (served on August 27, 2019) (Lead Action)	2.50
Review Defendant's Responses to Plaintiff Torres' 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) (served on September 30, 2019) (Lead Action)	6.80
Review Defendant's Objection to Plaintiff Torres' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; October 21, 2019) (Lead Action) (served on October 11, 2019)	2.10
Review Defendant's Objection to Plaintiff Torres' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Wage and Hour Practices; October 22, 2019) (served on October 15, 2019) (Lead Action)	2.50
Review Defendant's Objection to Plaintiff Torres' Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Affirmative Defenses; October 23, 2019) (served on October 17, 2019) (Lead Action)	2.80
Review Defendant's Supplemental Responses to Plaintiff Torres' Form Interrogatories – General (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) (served on September 30, 2019) (Lead Action)	5.40
Review and Analyze Documents Produced by Defendant (served on December 12, 2019) (Lead Action)	16.50
Negotiate, Draft, Review, and/or Revise <i>Belaire-West</i> Privacy Notice and Postcard, Obtain Bids from Third-Party Administrators, Communicate with Administrator and Defendant's Counsel, and Analyze Contact List (1,716 Individuals) and Related Information (December 2020 – March 2021)	11.50

Review Defendant's Form Interrogatories – General (Set One), Form Interrogatories – Employment (Set One) Special Interrogatories (Set One), and Requests for Production of Documents (Set One) to Plaintiff Torres (served on March 2, 2020) (Lead Action)	1.20
Draft, Review, and/or Revise Plaintiff Torres' Responses to Defendant's Form Interrogatories – General (Set One), Form Interrogatories – Employment (Set One) Special Interrogatories (Set One), and Requests for Production of Documents (Set One) to Plaintiff Torres (served on May 4, 2020) (Lead Action)	12.50
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on March 2, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on March 12, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on March 12, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on March 12, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jessica Salcedo (served on March 15, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on March 17, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on March 19, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Annette Olvera Nunez (served on March 22, 2021)	1.90

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on April 1, 2021)	2.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Annette Olvera Nunez (served on April 14, 2021)	9.10
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on April 18, 2021)	1.80
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Jessica Salcedo (served on April 19, 2021)	8.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on April 19, 2021)	4.30
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on April 19, 2021)	2.30
Draft Follow-Up Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on June 2, 2021)	1.80
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on August 27, 2021 and November 23, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on August 30, 2021)	1.90
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 13, 2021)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 14, 2021)	3.60

Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on December 14, 2021)	9.50
Draft, Review, and/or Revise Plaintiffs' First Amended Notice of Deposition of Defendant's Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; February 22, 2024) (served on January 17, 2024) (Lead Action)	1.10
Review Defendant's Objections to Plaintiffs' First Amended Notice of Deposition of Defendant's Person Most Knowledgeable at Defendant and Requests for Production of Documents (Organizational Structure; February 22, 2024) (served on February 14, 2024) (Lead Action)	1.20
Letters and Correspondence	
Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Salcedo under the Private Attorneys General Act (served on July 16, 2021)	4.50
Draft Correspondence to, Meet and Confer with, and Respond to Correspondence from, Defendant's Counsel	28.50
Mediation/Settlement	
Review and Analyze Extensive Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources Prior to Mediation Originally Scheduled for September 14, 2021	21.50
Review and Analyze Extensive Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources Prior to Mediation Originally Scheduled for February 6, 2023	24.50
Review and Analyze Extensive Information, Data, and Documents Obtained from Plaintiffs, Defendant, and Other Sources Prior to Mediation Conducted on August 21, 2023 (approximately 51,831 pages)	115.50
Draft, Review, and/or Revise Declarations of Dozens of Putative Class Members and/or Percipient Witnesses for Use in Connection with Settlement Negotiations and Litigation (June 2022 to August 2023)	71.50

Prepare for Mediation, Including Researching Settlement-Related and Merits-Related Issues, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Plaintiff's Mediation Brief, and Performing Damages and Penalties Analysis and Calculations (submitted on August 14, 2023)	64.50
Attend Mediation Session (August 21, 2023; via Video Conference)	9.50
Investigate Defendant's Financial Circumstances and Review and Analyze Documents and Information Obtained from Defendant and Other Sources	13.50
Engage in Additional Settlement-Related Discussions and Settlement Negotiations Following Unsuccessful Mediation	48.50
Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed on March 29, 2024)	5.50
Review, Revise, Negotiate, and Finalize Stipulation of Class Action and PAGA Settlement and Release (executed on July 12, 2024), and Draft Notice of Court Approved Class Action Settlement and Hearing Date for Final Court Approval	22.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Review Calculations, Documents, and Weekly Reports	7.50
Law and Motion	
Draft, Review, and/or Revise Plaintiff Torres's Notice of Motion and Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set One) Nos. 1 and 2 and Request for Monetary Sanctions, Declaration of Talar DerOhannessian in Support Thereof, Rule 3.1345 Separate Statement in Support Thereof, and [Proposed] Order Thereon (filed on March 27, 2020) (Lead Action)	15.50
Review Defendant's Opposition to Plaintiff Torres' Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set One) Nos. 1 and 2 and Request for Monetary	1.30

Sanctions, Separate Statement in Support Thereof, Declaration of Mazen Khatib in Support Thereof, and Declaration of Stacy Ferreira in Support Thereof (filed on June 15, 2020) (Lead Action)	
Draft, Review, and/or Revise Plaintiff Torres' Reply in Support of Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set One) Nos. 1 and 2 and Request for Monetary Sanctions (filed on June 19, 2020) (Lead Action)	6.80
Review Court's Order Granting Plaintiff Torres' Notice of Motion and Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set One) Nos. 1 and 2 and Request for Monetary Sanctions (issued on June 26, 2020) (Lead Action)	0.20
Research, Draft, Review, and/or Revise Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, Declaration of Helene Mayer in Support Thereof, Declaration of Plaintiff Torres in Support Thereof, Declaration of Plaintiff Salcedo in Support Thereof, Declaration of Plaintiff Nunez in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 9, 2024) (Lead Action)	22.50
Review Defendant's Notice of Non-Opposition to Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on October 24, 2024) (Lead Action)	0.20
Review Court's Order and Minute Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (issued on November 7, 2024) (Lead Action)	0.20
Review and Analyze Settlement Administrator's Declaration; and Research, Draft, Review, and/or Revise Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Enhancement Payments, Declaration of Helene Mayer in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on March 12, 2025) (Lead Action)	26.50
Total Hours:	868.20

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Torres v. Clinica Sierra Vista (Class + PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/30/2019	U.S. Postmaster	Postage	\$6.85
7/16/2019	Legal Document Server, Inc.	Attorney Service	\$28.97
7/16/2019	Kern County Superior Court	Complaint Filing Fee	\$435.00
8/26/2019	Legal Document Server, Inc.	Attorney Service	\$19.00
8/26/2019	Kern County Superior Court	Jury Fee	\$150.00
8/27/2019	General Logistics Systems US, Inc.	Courier Service	\$18.88
8/27/2019	General Logistics Systems US, Inc.	Courier Service	\$18.88
12/23/2019	Legal Document Server, Inc.	Attorney Service	\$105.00
12/23/2019	Legal Document Server, Inc.	Attorney Service	\$13.60
1/13/2020	Talar DerOhannessian	Travel Reimbursement	\$126.07
1/17/2020	Legal Document Server, Inc.	Attorney Service	\$10.00
1/17/2020	Legal Document Server, Inc.	Attorney Service	\$10.00
1/17/2020	General Logistics Systems US, Inc.	Courier Service	\$24.29
1/21/2020	General Logistics Systems US, Inc.	Courier Service	\$16.36
1/22/2020	One Legal	Attorney Service	\$14.36
1/22/2020	Kern County Superior Court	Stipulation & Order Fee	\$20.00
1/23/2020	General Logistics Systems US, Inc.	Courier Service	\$20.28
1/24/2020	One Legal	Attorney Service	\$13.55
2/3/2020	One Legal	Attorney Service	\$85.75
2/10/2020	Legal Document Server, Inc.	Attorney Service	\$48.75
2/10/2020	Kern County Superior Court	Complex Filing Fee	\$1,000.00
3/4/2020	Legal Document Server, Inc.	Attorney Service	\$13.60
3/4/2020	Legal Document Server, Inc.	Attorney Service	\$10.00
3/13/2020	General Logistics Systems US, Inc.	Courier Service	\$18.92
3/27/2020	FedEx Express	Courier Service	\$19.82
4/2/2020	Legal Document Server, Inc.	Attorney Service	\$15.85
4/2/2020	Kern County Superior Court	Motion Fee	\$60.00
4/27/2020	FedEx Express	Courier Service	\$24.14
5/4/2020	General Logistics Systems US, Inc.	Courier Service	\$15.79
6/16/2020	CourtCall, LLC	Attorney Service	\$94.00
6/16/2020	CourtCall, LLC	Attorney Service	\$94.00
6/19/2020	Legal Document Server, Inc.	Attorney Service	\$13.60
6/19/2020	General Logistics Systems US, Inc.	Courier Service	\$11.82
10/9/2020	General Logistics Systems US, Inc.	Courier Service	\$17.58
10/13/2020	Legal Document Server, Inc.	Attorney Service	\$14.60
10/19/2020	CourtCall, LLC	Attorney Service	\$94.00
12/14/2020	Legal Document Server, Inc.	Attorney Service	\$14.60
12/14/2020	Legal Document Server, Inc.	Attorney Service	\$14.60

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Torres v. Clinica Sierra Vista (Class + PAGA)

1/15/2021	CourtCall, LLC	Attorney Service	\$94.00
1/27/2021	Legal Document Server, Inc.	Attorney Service	\$14.60
2/28/2021	Simpluris, Inc.	Notice Mailing	\$2,025.00
3/10/2021	U.S. Postmaster	Postage	\$14.00
3/12/2021	U.S. Postmaster	Postage	\$7.00
3/15/2021	FedEx Express	Courier Service	\$23.14
3/15/2021	U.S. Postmaster	Postage	\$7.00
3/17/2021	U.S. Postmaster	Postage	\$14.00
3/19/2021	U.S. Postmaster	Postage	\$7.00
3/22/2021	U.S. Postmaster	Postage	\$7.00
9/7/2021	ProLegal	Attorney Service	\$166.25
10/6/2021	One Legal	Attorney Service	\$16.06
12/27/2021	Legal Document Server, Inc.	Attorney Service	\$15.70
12/27/2021	Kern County Superior Court	Stipulation & Order Fee	\$20.00
2/2/2022	Legal Document Server, Inc.	Attorney Service	\$11.00
2/10/2022	Legal Document Server, Inc.	Attorney Service	\$15.70
2/10/2022	Kern County Superior Court	Stipulation & Order Fee	\$20.00
3/10/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
3/18/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
4/14/2022	Legal Document Server, Inc.	Attorney Service	\$16.10
4/14/2022	First Mediation Corporation	Mediation Fee	\$10,000.00
4/14/2022	Kern County Superior Court	Stipulation & Order Fee	\$20.00
4/26/2022	CourtCall, LLC	Attorney Service	\$94.00
5/3/2022	Legal Document Server, Inc.	Attorney Service	\$16.10
5/3/2022	Kern County Superior Court	Stipulation & Order Fee	\$20.00
2/28/2023	Legal Document Server, Inc.	Attorney Service	\$16.85
2/28/2023	Kern County Superior Court	Stipulation & Order Fee	\$20.00
3/3/2023	CourtCall, LLC	Attorney Service	\$72.00
6/30/2023	Legal Document Server, Inc.	Attorney Service	\$17.70
6/30/2023	Kern County Superior Court	Stipulation & Order Fee	\$20.00
10/9/2023	Legal Document Server, Inc.	Attorney Service	\$17.09
10/9/2023	Kern County Superior Court	Stipulation & Order Fee	\$20.00
10/10/2023	Legal Document Server, Inc.	Attorney Service	\$15.55
2/16/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
2/16/2024	Kern County Superior Court	Stipulation & Order Fee	\$20.00
3/4/2024	Legal Document Server, Inc.	Attorney Service	\$15.55
3/4/2024	First Mediation Corporation	Supplemental Mediator's Fees	\$10,000.00
4/17/2024	Legal Document Server, Inc.	Attorney Service	\$15.55
10/11/2024	Legal Document Server, Inc.	Attorney Service	\$19.87

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Torres v. Clinica Sierra Vista (Class + PAGA)

10/11/2024	Kern County Superior Court	Motion Fee	\$60.00
Total:			<u>25,752.91</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Salcedo et al. vs. Clinica Sierra Vista

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/15/2021	U.S. Postmaster	Postage	\$6.96
8/5/2021	One Legal	Attorney Service	\$58.55
8/5/2021	Kern County Superior Court	Complex Filing Fee	\$1,000.00
8/5/2021	Kern County Superior Court	Complaint Filing Fee	\$435.00
9/7/2021	ProLegal	Attorney Service	\$166.25
11/1/2021	One Legal	Attorney Service	\$16.06
1/18/2022	Superior Court of California, Kern County	Attorney Service	\$11.00
1/24/2022	Superior Court of California, Kern County	Attorney Service	\$15.70
1/24/2022	Kern County Superior Court	Stipulation & Order Fee	\$20.00
2/25/2022	Superior Court of California, Kern County	Attorney Service	\$14.75
Total:			<u>\$1,744.27</u>

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Salcedo vs. Clinica Sierra Vista (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/16/2021	U.S. Postmaster	Postage	\$7.50
7/16/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
9/24/2021	One Legal	Attorney Service	\$29.05
9/24/2021	Kern County Superior Court	Complaint Filing Fee	\$435.00
11/1/2021	One Legal	Attorney Service	\$16.06
2/24/2022	Legal Document Server, Inc.	Attorney Service	\$14.75
Total:			<u>\$577.36</u>