

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Vartan Madoyan SBN (279015)
Helene Mayer (SBN 332975)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

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

ELIAS RIOS, individually, and on behalf of
other members of the general public similarly
situated;

Plaintiff,

vs.

MOUNTAIN VIEW CHILD CARE, INC.
DBA TOTALLY KIDS SPECIALTY
HEALTHCARE; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: CIVSB2121987

Honorable Christian Towns
Department S26

CLASS ACTION

**DECLARATION OF HELENE MAYER
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES, LITIGATION
COSTS, AND INCENTIVE AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action and PAGA
Settlement, Attorneys' Fees, Litigation
Costs, and Incentive Award; Declaration of
Class Representative (Elias Rios);
Declaration of Settlement Administrator
(Simpluris, Inc.); and [Proposed] Final
Approval Order and Judgment filed
concurrently herewith]

Date: April 2, 2025
Time: 8:30 a.m.
Department: S26

Complaint Filed: July 29, 2021
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 Elias Rios (“Plaintiff”) and the Class in the above-captioned matter. 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 October 16, 2024, in Department S26 of the above-entitled Court, the Honorable Christian Towns preliminarily approved the Joint Stipulation for Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant Mountain View Child Care, Inc. (“Defendant”) (together with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Elias Rios as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), 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 settlement 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 Settlement, Attorneys’ Fees, Litigation Costs, and Incentive Award (“Motion for Final Approval”), no Settlement Class Members have objected to the Class Settlement, the contemplated requests for Attorneys’ Fees, Litigation Costs, Incentive Award, and Administration Costs, or the PAGA Penalties.

WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively performing work in the above-captioned since prior to its commencement on July 29, 2021 (as well as in the PAGA

1 action which part of the Parties' global settlement).

2 5. Before initiating the case, Lawyers *for* Justice, PC investigated and researched the
3 facts and circumstances underlying the pertinent factual and legal issues and applicable law. This
4 required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and
5 Plaintiff and research into the various legal issues involved in the case, namely, the current state
6 of the law as it applied to certification, representative PAGA claims, off-the-clock theory, meal
7 and rest periods, wage-and-hour law and enforcement, Plaintiff's claims and damages, and
8 Defendant's potential defenses. After conducting an initial investigation, Lawyers *for* Justice, PC
9 determined that the claims of Plaintiff were well-suited for class-wide adjudication, owing to
10 what appeared to be a common course of conduct affecting a similarly situated group of current
11 and former hourly-paid or non-exempt employees who worked for any of the Defendants within
12 the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-
13 compliant meal and rest periods, and business expenses.

14 6. Class Counsel conducted significant litigation and formal and informal discovery
15 and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims,
16 and was preparing the cases for class certification and/or trial prior to reaching the Settlement.
17 The Parties exchanged a large volume of information, documents, and data throughout the course
18 of the litigation and in connection with the mediation and settlement negotiations. Class Counsel
19 had the opportunity to interview and obtain information from Plaintiff and other Class Members,
20 and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff,
21 Defendant, and other sources. Class Counsel served multiple sets of formal written discovery
22 requests. Specifically, in the Class Action, Class Counsel served Requests for Production of
23 Documents (Set One); Special Interrogatories (Sets One and Two); and Form Interrogatories -
24 General (Set One), on Defendant Mountain View Child Care, Inc. In the PAGA Action, Class
25 Counsel served Requests for Production of Documents (Set One); Special Interrogatories (Sets
26 One and Two); and Form Interrogatories – General (Set One), on Defendant Mountain View
27 Child Care, Inc. Also in the PAGA Action, Class Counsel served Requests for Production of
28 Documents (Set One); Special Interrogatories (Sets One and Two); and Form Interrogatories –

General (Set One) on Defendant Doug Padgett. Class Counsel also noticed the deposition of Mountain View Child Care, Inc.'s Person Most Knowledgeable designees, along with accompanying requests for production of documents. The volume of data and documents that Class Counsel reviewed and analyzed included and was not limited to: Plaintiff's employment records, a detailed sampling of Plaintiff's and other Class Members' time data and pay records, Defendant's Employee Handbook, company policy acknowledgements, forms, procedures, and policies, among other information and documents. Class Counsel also developed damages/valuation calculations in the course of litigation and in connection with mediation and settlement negotiations and met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, discovery, and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to drafting the Plaintiff's pleadings and mediation brief; engaging in significant law and motion practice (i.e. opposing and fully briefing Defendant's demurrer and motion for summary judgment, both of which Plaintiff prevailed on); preparing for and attending court proceedings; preparing for and engaging in mediation and settlement negotiations; and other tasks.

7. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating the case, mediation, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources that provided a critical understanding of the nature of the work performed by the Class Members and Aggrieved Employees, as well as Defendant's operations and employment policies, practices, and procedures. The information, documents, and data were used in analyzing violations, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to certification, representative PAGA claims, off-the-clock theory, meal and rest periods, wage-and-hour law and enforcement, Plaintiff's claims and damages, and Defendant's defenses thereto, as well as facts discovered.

8. After conducting significant investigation of the facts and law during the prosecution of the case, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the case. These efforts included participating in a formal, full-day mediation conducted by Jeffrey Krivis, Esq., a well-regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position. In the course of mediation and settlement discussions, the Parties exchanged information, documents, and data, and discussed various aspects of the case, including and not limited to, the risks and delays of further litigation; the risks to the Parties of proceeding with class certification and/or representative adjudication; the law relating to off-the-clock theory, meal and rest periods, PAGA representative claims, and wage-and-hour law and enforcement; the evidence produced and analyzed; and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the Parties was not easy. Defendant contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to class certification and representative adjudication. Defendant and its counsel felt strongly about Defendant's ability to avoid class certification and prevail on the merits, while Plaintiff and Class Counsel believed that they would be able to obtain class certification and prevail at trial. 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 Plaintiff's 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 case, and the real possibility of no monetary recovery after years of litigation.

9. By way of the accompanying Motion for Final Approval, Class Counsel seeks attorneys' fees ("Attorneys' Fees") in the amount of \$507,500.00, which is 35% of the Maximum Settlement Amount of \$1,450,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least 35% of the recovery.

10. 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 dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in the cases; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to these matters.

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 lodestar analysis. Attorneys at Lawyers for Justice, PC have spent a total of **444.20 hours** performing tasks and obtaining recovery in these matters. 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 the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of these matters.

12. The work performed in this particular matter, the background of Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable blended hourly rate of compensation of at least \$850 per hour 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 \$800 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action 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 compensation at the rate of \$936.47 per hour; 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 compensation at the rate of \$919.57 per hour; and 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 compensation at the rate of \$855.96 per hour.

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

13. For over a decade, 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 attorney of record in dozens of employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California.

14. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension

Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over 100 motions, taken or defended over 150 depositions, prepared dozens of expert witnesses for deposition or trial, and attended over 175 mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately 15 cases in the last decade and litigated over 1,000 class action or representative action cases.

15. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not

1 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
2 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
3 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
4 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
5 representative cases have resulted in settlements that have been granted court approval. He has
6 handled over 150 mediations and worked on over 250 class action or representative action cases
7 which have resulted in settlement.

8 16. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a
9 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
10 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
11 Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010)
12 and in New York (since 2013) and is also admitted to practice in all U.S. District Courts in
13 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme
14 Court. She has taken and defended dozens of depositions and successfully handled motion
15 practice in class action cases regarding discovery (including and not limited to, regarding class
16 contact information), class certification (both contested class certification and stipulated class
17 certification), arbitration agreements, coordination, and intervention. She has successfully
18 handled briefing and oral argument on appeal and obtained notable decisions regarding Private
19 Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g.,
20 *Betancourt v. Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert.
21 denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*,
22 8 Cal.5th175 (2019). She has significant experience with class actions, including and not limited
23 to working on cases to obtain class certification through contested motion practice and working
24 on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical
25 sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving
26 a certified class consisting of approximately 2,600 individuals). She also has extensive experience
27 with class action and/or representative action settlements, and has handled this process in over
28 300 cases. Under her, Edwin Aiwazian, Arby Aiwazian's supervision, Lawyers for Justice, PC

1 has handled the class certification and court approval process for hundreds of class action and/or
2 representative action matters that have successfully resolved. She is a member of the California
3 Employment Lawyers Association and, on several occasions, has been a speaker regarding topics
4 in wage and hour law at the organization's continuing legal education events.

5 17. Vartan Madoyan is a Member of Lawyers *for* Justice, PC. He received his Bachelor
6 of Arts degree in Economics from the University of California, San Diego in 2007, and a Juris
7 Doctor degree from Loyola Law School in 2011, graduating with Cum Laude and Order of the
8 Coif honors. He is admitted to practice before all courts in the State of California and all U.S.
9 District Courts in California. He externed for the Honorable Victoria S. Kaufman of the United
10 States Bankruptcy Court, Central District of California, from June 2009 to August 2009. He
11 externed for the Honorable Gary A. Feess of the United States District Court, Central District of
12 California, from January 2010 to May 2010. From 2011 through and including the present, he
13 has practiced almost exclusively on complex wage and hour class action and PAGA action
14 matters in California. From October 2011 to June 2013, he was an Associate at Littler
15 Mendelson's Century City, California office, working for one of the largest employer-side labor
16 and employment law firms in the United States. From July 2013 to March 2014, he was an
17 Associate at Sheppard, Mullin, Richter & Hampton's Century City, California office. From
18 March 2014 to July 2023, he worked as an Associate and then as Counsel at Baker Hostetler
19 LLP's Los Angeles office. From August 2023 to the present, he has been a Member of Lawyers
20 *for* Justice, PC. He has taken and defended dozens of depositions and successfully handled
21 motion practice in class action and PAGA cases regarding discovery (including and not limited
22 to motions regarding class contact information), class certification (both contested class
23 certification and stipulated class certification), dispositive motions, arbitration agreements,
24 coordination, and intervention. He has successfully handled a complex wage and hour class
25 action and PAGA through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*, Orange
26 County Superior Court, Case No. 30-2013-00692890. He has also successfully handled briefing
27 on appeal regarding employer efforts to compel arbitration. *TitleMax of Cal. v. Pena*, California
28 Court of Appeals for the Fifth District, Case No. F084706 (Cal. Ct. App. March 28, 2023)

(unpublished decision). Further, he has extensive experience with settlements of class actions and PAGA actions and have handled and supervised this process in over one hundred (100) cases.

18. 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**

19. To date, Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in these matters. Lawyers for Justice, PC seeks reimbursement of **\$24,605.05** 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 cases and to obtain the Settlement.

INCENTIVE AWARD TO PLAINTIFF

20. In recognition of her efforts and work serving as the Class Representative, the Settlement provides for an Incentive Award in the amount of \$10,000.00 to Plaintiff Elias Rios. The requested Incentive Award is fair and appropriate. Plaintiff spent a substantial amount of time and effort to produce relevant documents and information and provided facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Class Counsel needed him and actively tried to obtain and provide information that would facilitate the pursuit of the

1 case. Plaintiff spent numerous hours speaking with Class Counsel about his claims, describing
2 his work experiences with Defendant, and gathering and reviewing documents. Accordingly, it is
3 appropriate for Plaintiff to receive \$10,000.00 as a reasonable Incentive Award for his services
4 in the case, in addition to her individual settlement payments.

5 21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best
6 interests of Plaintiff, Class Members, Aggrieved Employees, and the State of California.

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

9 Executed this 10th day of March 2025, at Mooresville, North Carolina.

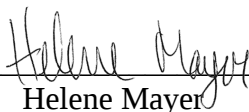
10
11 
12 Helene Mayer

EXHIBIT A

ELIAS RIOS V. MOUNTAIN VIEW CHILD CARE, INC.
San Bernardino County Superior Court, Case No. CIVSB2121987 (“Class Action”)

ELIAS RIOS V. MOUNTAIN VIEW CHILD CARE, INC.
San Bernardino County Superior Court, Case No. CIVSB2127153 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Elias Rios (“Plaintiff”)	13.50
Investigate, Communicate with, and/or Interview Putative Class Members, Aggrieved Employees, and Percipient Witnesses	18.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Claims, Conduct Legal Research and Analysis of All Claims Involved, and Draft Plaintiff’s Class Action Complaint for Damages (filed on July 29, 2021) (Class Action)	9.50
Review Court’s Guidelines for the Complex Litigation Program and Initial Case Management Conference Order (issued on August 24, 2021) (Class Action)	0.20
Investigate the Merits of Plaintiff’s PAGA Claim, Conduct Legal Research and Analysis of PAGA Claim, and Draft Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on September 20, 2021) (PAGA Action)	8.50

Review Defendant Mountain View Child Care, Inc.'s ("Defendant") Notice of General Appearance (filed on October 27, 2021) (Class Action)	0.10
Review Court's Notice of Filing Fees Due (issued on October 27, 2021) (PAGA Action)	0.10
Review Court's Guidelines for the Complex Litigation Program and Initial Case Management Conference Order (issued on November 8, 2021) (PAGA Action)	0.20
Meet and Confer with Defendant's Counsel and Draft Joint Initial Case Management Conference Statement (filed on November 8, 2021) (Class Action)	1.50
Review and Analyze Defendant's Answer to Plaintiff's Class Action Complaint (served on December 21, 2021), and Research Affirmative Defenses in Defendant's Answer (Class Action)	1.60
Review Defendants Mountain View Child Care, Inc. and Doug Padgett's (together, "Defendants") Notice of General Appearance (served on December 22, 2021) (PAGA Action)	0.10
Review Court's Notice of Filing Fees Due (issued on January 3, 2022) (PAGA Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Initial Case Management Conference Statement (filed on January 25, 2022) (PAGA Action)	1.20
Review Defendants Mountain View Child Care, Inc. and Doug Padgett's Notice of Posting Jury Fees (served on February 4, 2022) (PAGA Action)	0.10
Draft Plaintiff's Notice of Posting Jury Fees (filed on February 18, 2022) (PAGA Action)	0.10
Review Court Clerk's Notice of Continuance (issued on March 15, 2022) (Class Action)	0.10
Draft Plaintiff's Notice of Continuance of Case Management Conference (filed on March 22, 2022) (Class Action)	0.20

Review and Analyze Defendants' Answer to Plaintiff's Complaint (served on May 24, 2022), and Research Affirmative Defenses in Defendants' Answer (PAGA Action)	1.30
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Further Case Management Conference; [Proposed] Order (filed on June 2, 2022) (Class Action)	1.20
Review Court's Order Granting Joint Stipulation to Continue Further Case Management Conference (issued on June 8, 2022) (Class Action)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order (filed June 14, 2022) (Class Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Further Case Management Statement (filed on July 22, 2022) (PAGA Action)	0.50
Meet and Confer with Defendants' Counsel and Draft Joint Stipulation to Continue Trial Setting Conference; [Proposed] Order (filed on December 23, 2022) (PAGA Action)	1.10
Review Court's Order Granting Joint Stipulation to Continue Trial Setting Conference (issued on December 29, 2022) (PAGA Action)	0.10
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Joint Stipulation to Continue Trial Setting Conference (filed on January 10, 2023) (PAGA Action)	0.10
Review Court's Notice of Re-Assignment of Case for All Purposes (issued on January 24, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Case Management Conference; [Proposed] Order (filed on February 10, 2023) (Class Action)	1.10
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference (issued on February 15, 2023) (Class Action)	0.10

Draft Plaintiff's Notice of Entry of Judgment or Order (filed February 16, 2023) (Class Action)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Stipulation to Continue Trial Setting Conference; [Proposed] Order (served on March 1, 2023) (PAGA Action)	1.10
Review Court's Order Granting Joint Stipulation to Continue Trial Setting Conference (issued on March 7, 2023) (PAGA Action)	0.20
Draft Plaintiff's Notice of Entry of Judgment or Order Re: Order Granting Joint Stipulation to Continue Trial Setting Conference (filed on March 14, 2023) (PAGA Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Case Management Conference Statement (filed on April 19, 2023) (Class Action)	1.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement (filed on May 1, 2023) (PAGA Action)	1.10
Meet and Confer with Defendants' Counsel and Draft Joint Notice of Settlement (filed on June 26, 2023) (PAGA Action)	0.50
Review Court Clerk's Notice of Continuance (issued on June 26, 2023) (Class Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Notice of Settlement (filed on June 26, 2023) (Class Action)	0.50
Meet and Confer with Defendant's Counsel and Draft Joint Further Case Management Statement (filed on August 17, 2023) (Class Action)	1.10
Meet and Confer with Defendant's Counsel and Draft Joint Further Case Management Statement (filed on October 30, 2023) (Class Action)	1.10

Meet and Confer with Defendants' Counsel and Draft Joint Further Case Management Conference Statement (filed on October 30, 2023) (PAGA Action)	0.50
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (filed on January 19, 2024) (Class Action)	1.20
Review Court's Order Granting Joint Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (issued on January 24, 2024) (Class Action)	0.10
Draft Plaintiff's Notice of Entry of Judgment and Order Re: Order Granting Joint Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on January 30, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (filed on March 29, 2024) (Class Action)	1.10
Review Court's Order Granting Joint Case Management Conference Statement and Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (issued on April 9, 2024) (Class Action)	0.20
Draft Plaintiff's Notice of Entry of Judgment and Order Re: Order Granting Joint Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (filed on April 16, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Case Management Conference Statement and Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement; [Proposed] Order Thereon (filed on June 28, 2024) (Class Action)	1.20

Review Court's Order Granting Joint Case Management Conference Statement and Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (issued on July 1, 2024) (Class Action)	0.20
Review Defendant's Case Management Statement (served on September 23, 2024) (Class Action)	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Further Case Management Statement (filed on October 1, 2024) (Class Action)	0.50
Meet and Confer with Defendants' Counsel and Draft Joint Further Case Management Statement (filed on October 1, 2024) (PAGA Action)	0.50
Review Court Clerk's Notice of Continuance Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (issued on October 3, 2024) (Class Action & PAGA Action)	0.10
Appearances	
Prepare for and Remotely Attend Case Management Conference (November 18, 2021) (Class Action)	0.50
Prepare for and Remotely Attend Case Management Conference (February 3, 2022) (PAGA Action)	1.60
Prepare for and Remotely Attend Hearing on Defendants' Demurrer (May 11, 2022) (PAGA Action)	3.30
Prepare for and Remotely Attend Further Case Management Conference (August 2, 2022) (PAGA Action)	0.70
Prepare for and Remotely Attend Case Management Conference (April 26, 2023) (Class Action)	1.50
Prepare for, Travel to/from San Bernardino, and Attend Hearing on Defendants' Motion for Summary Judgment (May 8, 2023) (PAGA Action)	10.30
Prepare for and Remotely Attend Informal Discovery Conference (May 11, 2023) (Class Action)	1.50

Prepare for and Remotely Attend Case Management Conference (August 24, 2023) (Class Action)	0.90
Prepare for and Remotely Attend Case Management Conference (November 9, 2023) (Class Action & PAGA Action)	0.70
Prepare for and/or Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (October 16, 2024) (Class Action)	1.30
Discovery and Deposition	
Draft Letter to Defendant Re: Request for Personnel File, Pay Stubs, and Time Records for Elias Rios (served on May 14, 2021)	1.90
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Elias Rios (served on June 18, 2021)	7.80
Draft Plaintiff's Form Interrogatories—General (Set One), Special Interrogatories (Sets One & Two), and Requests for Production of Documents (Set One) to Defendant Mountain View Child Care, Inc. (served on January 20, 2022) (Class Action)	4.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc. and Requests for Production of Documents (Organizational Structure; March 2, 2022) (served on January 20, 2022) (Class Action)	1.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc. and Requests for Production of Documents (Wage and Hour Practices; March 3, 2022) (served on January 20, 2022) (Class Action)	1.50
Draft Plaintiff's Form Interrogatories—General (Set One), Special Interrogatories (Sets One & Two), and Requests for Production of Documents (Set One) to Defendant Mountain View Child Care, Inc. (served on February 16, 2022) (PAGA Action)	4.10

Draft Plaintiff's Form Interrogatories—General (Set One), Special Interrogatories (Sets One & Two), and Requests for Production of Documents (Set One) to Defendant Doug Padgett (served on February 16, 2022) (PAGA Action)	3.80
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc. and Requests for Production of Documents (Organizational Structure; April 27, 2022) (served on February 16, 2022) (PAGA Action)	1.50
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc. and Requests for Production of Documents (Wage and Hour Practices; April 28, 2022) (served on February 16, 2022) (PAGA Action)	1.90
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc. and Response to Requests for Production of Documents (Organizational Structure; March 2, 2022) (served on February 23, 2022) (Class Action)	1.30
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc., and Response to Requests for Production of Documents (Organizational Structure; March 3, 2022) (served on February 23, 2022) (Class Action)	1.80
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc. and Response to Requests for Production of Documents (Organizational Structure; March 3, 2022) (served on April 21, 2022) (Class Action)	1.80
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc. and Response to Requests for Production of Documents (Organizational Structure; April 27, 2022) (served on April 21, 2022) (Class Action)	1.20
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc. and Response to Requests for Production of Documents (Wage and Hour Practices; March 3, 2022) (served on April 21, 2022) (PAGA Action)	1.10

Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc. and Response to Requests for Production of Documents (Organizational Structure; April 27, 2022) (served on April 21, 2022) (PAGA Action)	1.10
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc., and Response to Requests for Production of Documents (Organizational Structure; April 27, 2022) (served on April 22, 2022) (PAGA Action)	1.30
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc., and Response to Requests for Production of Documents (Wage and Hour Practices; April 28, 2022) (served on April 22, 2022) (PAGA Action)	1.50
Review Defendant's Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant Mountain View Child Care, Inc. and Response to Requests for Production of Documents (Wage and Hour Practices; March 3, 2022) (served on April 28, 2022) (Class Action)	1.50
Review Defendant Mountain View Child Care, Inc.'s Responses to Plaintiff's Form Interrogatories—General (Set One), Special Interrogatories (Sets One & Two), and Request for Production of Documents (Set One) (served on June 8, 2022) (Class Action)	7.10
Review Defendant Doug Padgett's Responses to Plaintiff's Interrogatories—General (Set One), Special Interrogatories (Sets One & Two), and Request for Production of Documents (Set One) (served on June 15, 2022) (PAGA Action)	7.50
Review Defendant Mountain View Child Care, Inc.'s Responses to Plaintiff's Interrogatories—General (Set One), Special Interrogatories (Sets One & Two), and Request for Production of Documents (Set One) (served on June 15, 2022) (PAGA Action)	7.20
Draft <i>Belaire-West</i> Notice and Postcard Re: Contact Information, Meet and Confer with Defendant's Counsel, and Obtain and Review Quotes from Third-Party Administrators for <i>Belaire-West</i> Notice Administration	3.90

Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff under the Private Attorneys General Act (served on July 15, 2021)	4.50
Draft Correspondence to, Meet and Confer With, and Respond to Other Correspondence from Defendants' Counsel	17.50
Mediation/Settlement	
Review and Analyze Extensive Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation (approximately 3,893 pages)	65.50
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 December 7, 2022)	41.50
Attend Mediation Session (December 14, 2022, via Video Conference)	8.50
Continued Settlement Communications with Mediator	4.50
Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed on June 4, 2023)	3.80
Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement (executed on September 13, 2024), and Draft Notice of Class Action Settlement	19.50
Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Review Calculations, Documents, and Weekly Reports	7.50

Law and Motion	
Review and Analyze Defendants' Notice of Demurrer and Demurrer to Plaintiff's Complaint for Violation of the Private Attorneys General Act of 2004; Memorandum of Points and Authorities, Defendants' Request for Judicial Notice in Support of Defendants' Demurrer to Complaint, and Declaration of Christie E. Yang in Support of Defendants' Demurrer to Complaint (served on March 7, 2022) (PAGA Action)	1.80
Research and Draft Plaintiff's Opposition to Defendants' Demurrer to Plaintiffs' Complaint for Violation of the Private Attorneys General Act of 2004, and Plaintiff's Request for Judicial Notice in Support of Elias Rios' Opposition to Defendants' Demurrer to Plaintiff's Complaint (filed on April 28, 2022) (PAGA Action)	12.50
Review and Analyze Defendants' Reply in Support of Demurrer to Plaintiff's Complaint for Violation of the Private Attorneys General Act of 2004 (served on May 4, 2022) (PAGA Action)	1.30
Review and Analyze Defendants Mountain View Child Care, Inc. and Doug Padgett's Notice of Motion and Motion for Summary Judgment or, in the Alternative, Summary Adjudication, Defendants' Mountain View Child Care, Inc. and Doug Padgett's Memorandum of Points and Authorities in Support of Defendants' Motion for Summary Judgment, or in the Alternative, Summary Adjudication, Defendants' Index of Evidence in Support of their Motion for Summary Judgment, or in the Alternative, Summary Adjudication, Separate Statement in Support of Defendants' Motion for Summary Judgment, or in the Alternative, Summary Adjudication, Declaration of Christie E. Yang in Support of Defendants' Motion for Summary Judgment, or in the Alternative, Summary Adjudication, [Proposed] Order Re Defendants' Motion for Summary Judgment, or in the Alternative, Summary Adjudication (served on February 17, 2023) (PAGA Action)	3.50
Draft Plaintiff's Opposition to Defendants' Motion for Summary Judgment or in the Alternative, Summary Adjudication, Plaintiff's Separate Statement in Opposition to Defendants' Motion for Summary Judgment or in the Alternative, Summary Adjudication, Plaintiff's Compendium of Evidence in Opposition to Defendants' Motion for Summary Judgment, or in the Alternative, Summary Adjudication, Plaintiff's	45.50

Request for Judicial Notice in Support of Opposition to Defendants' Motion for Summary Judgment or in the Alternative, Summary Adjudication (filed on April 24, 2023) (PAGA Action)	
Review and Analyze Defendants Mountain View Child Care, Inc. and Doug Padgett's Reply Brief in Support of Defendants' Motion for Summary Judgment or, in the Alternative, Summary Adjudication, Defendants Mountain View Child Care, Inc. and Doug Padgett's Reply to Plaintiff's Opposition to Defendants' Separate Statement in Support of Defendants' Motion for Summary Judgment or, in the Alternative, Summary Adjudication, Defendants Mountain View Child Care, Inc. and Doug Padgett's Response to Plaintiff's Additional Undisputed Material Facts, in Opposition to Defendants' Separate Statement in Support of Defendants' Motion for Summary Judgment or, in the Alternative, Summary Adjudication, and Defendants Mountain View Child Care, Inc. and Doug Padgett's Request for Judicial Notice in Support of Defendants' Separate Statement in Support of Defendants' Motion for Summary Judgment or, in the Alternative, Summary Adjudication (served on May 3, 2023) (PAGA Action)	1.80
Review Court's Tentative Ruling Re: Hearing on Demurrer (issued on May 11, 2022) (PAGA Action)	0.60
Review Court's Minute Order Re: Notice of Ruling Submitted Matter "Demurrer" (issued on May 13, 2022) (PAGA Action)	0.20
Review Court's Tentative Ruling Re: Motion for Summary Judgment or Summary Adjudication (issued on May 11, 2023) (PAGA Action)	0.30
Research and Draft Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities, Declaration of Helene Mayer in Support Thereof, Declaration of Plaintiff Elias Rios in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on September 16, 2024) (Class Action)	17.50
Review Court's Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, and Minute Order Re: Hearing on Motion for Preliminary Approval of Class Action Settlement (issued on October 16, 2024) (Class Action)	0.30

Draft Plaintiff's Notice of Entry of Judgment or Order Re: Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on November 8, 2024) (Class Action)	0.20
Review and Analyze Settlement Administrator's Declaration; and Research and Draft Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees, Litigation Costs, and Incentive Award, Declaration of Helene Mayer in Support Thereof, and [Proposed] Final Approval Order and Judgment (Class Action)	22.50
Total Hours:	444.20

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Rios vs. Mountain View Child Care, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/14/2021	U.S. Postmaster	Postage	\$7.00
7/29/2021	Legal Document Server, Inc.	Attorney Service	\$200.23
7/29/2021	San Bernardino Superior Court	Complex Filing Fee	\$1,000.00
7/29/2021	San Bernardino Superior Court	Complaint Filing Fee	\$435.00
10/13/2021	Legal Document Server, Inc.	Attorney Service	\$120.00
10/19/2021	One Legal		\$69.49
11/8/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
11/8/2021	General Logistics Systems US, Inc.	Courier Service	\$16.38
11/19/2021	CourtCall, LLC	Attorney Service	\$94.00
1/20/2022	General Logistics Systems US, Inc.	Courier Service	\$25.06
3/10/2022	First Mediation Corporation	Mediation Fee	\$9,000.00
3/22/2022	Legal Document Server, Inc.	Attorney Service	\$145.00
6/2/2022	Legal Document Server, Inc.	Attorney Service	\$146.35
6/2/2022	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
6/13/2022	San Bernardino Superior Court	Document Download Fee	\$2.50
6/14/2022	Legal Document Server, Inc.	Attorney Service	\$145.00
2/10/2023	Legal Document Server, Inc.	Attorney Service	\$151.35
2/10/2023	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
2/15/2023	San Bernardino Superior Court	Document Download Fee	\$2.50
2/16/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
4/19/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
4/27/2023	CourtCall, LLC	Attorney Service	\$72.00
5/10/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
6/26/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
8/18/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
10/30/2023	Legal Document Server, Inc.	Attorney Service	\$17.09
11/13/2023	CourtCall, LLC	Attorney Service	\$72.00
12/6/2023	First Mediation Corporation	Supplemental Mediator's Fee	\$5,000.00
1/19/2024	Legal Document Server, Inc.	Attorney Service	\$196.39
1/19/2024	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
1/30/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
2/1/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
4/2/2024	Legal Document Server, Inc.	Attorney Service	\$135.00
4/19/2024	Legal Document Server, Inc.	Attorney Service	\$155.00
4/24/2024	Legal Document Server, Inc.	Attorney Service	\$19.03
5/21/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
6/24/2024	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
6/28/2024	Legal Document Server, Inc.	Attorney Service	\$116.39

LAWYERS for JUSTICE PC CASE COST DETAIL
Rios vs. Mountain View Child Care, Inc.

6/28/2024	Legal Document Server, Inc.	Attorney Service	\$45.00
6/28/2024	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
9/16/2024	Legal Document Server, Inc.	Attorney Service	\$267.67
9/16/2024	San Bernardino Superior Court	Motion Fee	\$60.00
10/1/2024	Legal Document Server, Inc.	Attorney Service	\$180.00
11/8/2024	Legal Document Server, Inc.	Attorney Service	\$200.00
Total:			<u>\$19,121.56</u>

LAWYERS for JUSTICE PC CASE COST DETAIL
Rios vs. Mountain View Child Care, Inc., et al. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
7/15/2021	U.S. Postmaster	Postage	\$22.50
7/15/2021	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
9/20/2021	Legal Document Server, Inc.	Attorney Service	\$168.49
9/20/2021	San Bernardino Superior Court	Complaint Filing Fee	\$435.00
11/1/2021	Legal Document Server, Inc.	Attorney Service	\$122.50
11/1/2021	San Bernardino Superior Court	Complex Filing Fee	\$1,000.00
12/1/2021	Legal Document Server, Inc.	Attorney Service	\$130.00
1/25/2022	Legal Document Server, Inc.	Attorney Service	\$130.00
1/25/2022	General Logistics Systems US, Inc.	Courier Service	\$23.99
2/4/2022	CourtCall, LLC	Attorney Service	\$94.00
2/16/2022	General Logistics Systems US, Inc.	Courier Service	\$24.97
2/18/2022	Legal Document Server, Inc.	Attorney Service	\$87.13
2/18/2022	San Bernardino Superior Court	Jury Fee	\$150.00
4/28/2022	Legal Document Server, Inc.	Attorney Service	\$214.50
5/12/2022	CourtCall, LLC	Attorney Service	\$94.00
7/22/2022	Legal Document Server, Inc.	Attorney Service	\$150.00
8/3/2022	CourtCall, LLC	Attorney Service	\$94.00
12/23/2022	Legal Document Server, Inc.	Attorney Service	\$196.35
12/23/2022	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
1/10/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
3/1/2023	Legal Document Server, Inc.	Attorney Service	\$151.35
3/1/2023	San Bernardino Superior Court	Stipulation & Order Fee	\$20.00
3/14/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
4/24/2023	Legal Document Server, Inc.	Attorney Service	\$170.00
5/1/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
5/8/2023	Travis Maher	Travel Reimbursement	\$78.60
5/9/2023	Coalition Court Reporters	Court Reporter	\$790.40
5/9/2023	Margaux Gundzik	Travel Reimbursement	\$171.62
6/26/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
10/30/2023	Legal Document Server, Inc.	Attorney Service	\$17.09
11/10/2023	CourtCall, LLC	Attorney Service	\$72.00
10/1/2024	Legal Document Server, Inc.	Attorney Service	\$180.00
Total:			\$5,483.49