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Attorneys for Plaintiff DAMON COFFEY, Individually, and on behalf of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

DAMON COFFEY, individually, and on
behalf of other members of the public
similarly situated,

Plaintiff

v.

SOUTHERN CALIFORNIA
PERMANENTE MEDICAL GROUP, INC.,
a California Corporation and DOES 1-10,
inclusive,

Defendants

CASE NO. 37-2020-00029409-CU-OE-CTL

CLASS ACTION & REPRESENTATIVE
ACTION

**DECLARATION OF ERIC K. YAECKEL
IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR FINAL
APPROVAL OF (1) CLASS ACTION
SETTLEMENT; (2) ATTORNEYS' FEES
AND COSTS; and (3) CLASS
REPRESENTATIVE AWARD**

Date: May 24, 2024

Time: 9:00 a.m.

Judge: Hon. Blaine Bowman

Dept.: C-74

1 I, Eric K. Yaeckel, hereby declare as follows:

2 1. I am an attorney licensed to practice law before this Court and am employed with the law firm
3 of Sullivan & Yaeckel Law Group, APC, attorneys of record for Plaintiff Damon Coffey,
4 individually, and on behalf of other members of the general public similarly situated
5 (“Plaintiff.”) I make this declaration in support of Plaintiffs’ Unopposed Motion for Final
6 Approval of Class Action Settlement.

7 2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a
8 witness I could and would do so.

9 **Experience of Counsel**

10 3. The Lead Trial Counsel, Mr. William Sullivan, has been a California-licensed attorney for 30
11 years. He has approximately 29 years of experience in “class action” litigation, both as plaintiff
12 and defense counsel. Mr. Sullivan has acted as Trial Counsel (for Plaintiff) in multiple “Wage
13 and Hour” Class/Representative actions, including the (San Diego Superior Court) Trial which
14 is the subject of the Published decision entitled *Carrington v. Starbucks* (2018) 30 Cal.App.5th
15 504. Mr. Sullivan (who is currently and temporarily unavailable, due to a medical issue),
16 estimates that, throughout the course of his 30-year career, he has acted as Lead Plaintiff’s
17 counsel on “Wage and Hour” Class/Representative actions that have collected more than \$300
18 million for employees and/or the State of California, either through judgment following trial,
19 or via negotiated settlement. As part of the negotiation and collection process, Mr. Sullivan
20 was required to perform the same analysis that he (and others) are performing on this matter,
21 as set forth below.

22 2. I have over 13 years of experience as an attorney, which includes trial experience, including
23 the above referenced *Carrington v. Starbucks* case. I have spent my entire practice engaged in
24 prosecuting class and representative actions. I became a partner in the firm in 2020. I estimate
25 that, throughout the course of my 13-year career, I have acted as Plaintiff’s counsel on “Wage
26 and Hour” Class/Representative actions that have collected approximately \$30 million for
27 employees and/or the State of California. As part of the negotiation and collection process, I
28 have been required to perform the same analysis that I (and others) am performing on this

1 matter, as set forth below.

2 3. Ryan T. Kuhn has over 5 years experience prosecuting class and representative actions, which
3 includes trial experience. Throughout the course of his 5-year career, Mr. Kuhn estimates that
4 he has acted as Plaintiff's counsel on "Wage and Hour" Class/Representative actions that have
5 collected more than \$12 million for employees and/or the State of California. As part of the
6 negotiation and collection process, Mr. Kuhn was required to perform the same analysis that
7 he (and others) are performing on this matter, as set forth below.

8 4. Sullivan and Yaeckel Law Group APC ("S+Y"), and the above listed attorneys, are the
9 attorneys of record in a matter recently (and favorably) decided before the California Supreme
10 Court entitled *Donohue v. AMN Services, LLC*, 11 Cal.5th 58 (2021). The *Donohue* matter
11 was a certified class and PAGA action.

12 5. S+Y is currently lead counsel on approximately 80 employment "wage and hour" claims with
13 class action, or representative action, allegations. These cases are set within the California
14 Superior Courts and Federal District Courts in California. S+Y is currently lead counsel on
15 claims that have been certified by both Court Order and by stipulation of the parties. In the last
16 three years, the S+Y has settled at least 17 employment "wage and hour" claims on behalf of
17 a Certified Class.

18 6. S+Y has the requisite experience knowledge of California law and the Federal Rules of Civil
19 Procedure required to act on behalf of the Class. I consider the Settlement Agreement in this
20 matter to represent a fair, adequate and reasonable settlement that is well within the accepted
21 range of recoveries for similar wage and hour class actions. I also believe the Agreement is in
22 the best interests of the Settlement Class Members. I am also aware that Defendant's counsel
23 (both the firm, and individual attorneys working on this case) have extensive experience
24 defending similar wage and hour class actions.

25 7. In the last five years, the S+Y has tried three "Wage and Hour" Representative (PAGA) cases.
26 In a recent successful PAGA trial, tried before Judge Bacal, S+Y was awarded our full
27 requested attorneys fees, and was approved at the requested hourly rates. Please See
28 *Carrington v. Starbucks Corp.* San Diego Superior Court, Case No.

37-2014-00018637-CU-OE-CTL and published appellate opinion 30 Cal.App.5th 504.

8. S+Y has the requisite experience knowledge of California law required to act on behalf of the Class. As a Partner with S+Y, I consider the Settlement Agreement in this matter to represent a fair, adequate and reasonable settlement that is well within the accepted range of recoveries for similar wage and hour class actions. I also believe the Agreement is in the best interests of the Settlement Class Members.

9. Based on the above experience, it is this firm's opinion that this settlement represents a fair and adequate payment to the class.

10. **Please Note:** Much of the initial investigation and discovery in this case was conducted during the height of the Covid Pandemic. This made discovery and investigation much more "labor intensive," in that certain discovery methods (*i.e.*, PMK depositions, "group" meetings with Class Members) were either prohibited or restricted, by operation of law. This required more "individualized" investigation and analysis, which - in certain areas - required more attorney billable time. As *one* example, the bulk of evidence regarding the challenged policies and practices is usually gathered from a "PMK" deponent. This information was initially required to be gathered by alternative means As a *second* example, prior to Covid, Mr. Sullivan (Plaintiff's Trial counsel) would regularly hold "group" interviews with putative class members, which would "streamline" the process. Due to Covid, Mr. Sullivan was required to set individual meetings, which lead to numerous additional hours being expended on investigation.

11. Additionally, a simple review of the Court's Registrar of Actions ("ROA") shows this matter was heavily litigated over the course of nearly four years. Moreover, the entries on the ROA do not include the multitude of briefings and hearings before the Discovery Referee appointed in this matter.

The Lodestar Analysis

12. Plaintiffs' counsel seek attorneys fees in the amount of one third of the total settlement amount, which is **\$3,323,333.33**. Pursuant to the parties joint prosecution agreement, this firm is specifically seeking 50% (\$1,661,666.66) of the awarded attorneys fees. For purposes of a

1 lodestar cross-check the S & Y's attorneys' fees incurred (to date) are estimated to amount to
2 approximately **\$1,063,450.00**. The Attorney's fees are broken down as follows:

3 a. Mr. Sullivan served as lead investigator and trial counsel, per the specific request of
4 Plaintiffs. Over the course of the investigation (including pre-filing), Mr. William
5 Sullivan has currently expended approximately **612.8** hours in the service of this
6 action. **612.8** hours times **\$800.00** equals **\$490,240.00**. The work includes nearly all
7 preliminary investigation, the majority of the client and Class interaction/meetings,
8 taking "person most knowledgeable" depositions, and much of the other pre-settlement
9 work, including the preparation of a Class Certification Motion and Plaintiff's
10 Mediation Brief and damages analysis. This time also includes traveling to at least 32
11 interviews with proposed Class Members residing across various parts of California.
12 The preliminary investigation included the review and analysis of several thousand
13 documents, as well as additional phone interviews with at least 22 other Class
14 Members. Mr. Sullivan undertook a significant (approximately 100 hours of) pre-filing
15 investigation, wherein many of the Class Member interviews took place. As mentioned
16 above, more hours than "normal" were expended during this time as this case was filed
17 in June of 2020, so all pre-filing investigation (including individual class member
18 interviews) were conducted during the height of the Covid Pandemic. During this time,
19 Mr. Sullivan also investigated Defendant, its business practices, and any variations in
20 Class Members' job duties and rates of pay. Mr. Sullivan also interviewed numerous
21 "union employees," to help determine whether they had valid Labor Code claims,
22 versus potential collective bargaining agreement issues.

23 b. I was the partner primarily assigned to oversee the "day to day" activity of the primary
24 associates assigned to this case. My billing rate is \$660.00 per hour. I have currently
25 expended approximately **511.5** hours in the service of this action. **511.5** hours times
26 **\$660.00** equals **\$337,590**. Aside from supervising the Associate Attorneys, this work
27 includes attending hearings, drafting and reviewing correspondence and motions, and
28 much of the day to day communication with opposing counsel. Additional examples

of the work I performed included:

- I defended Plaintiff's deposition which was conducted over two separate full days. For the second day of deposition, I was required to travel to Boise, Idaho. I did not charge for the travel itself, but this increased preparation time. Prior to each deposition session, Plaintiff and I were required to jointly review thousands of pages of documents produced that were directly applicable to Plaintiff's employment. I incurred approximately **44.9** hours related to these tasks.
- In early 2022, a *Belair-West* privacy notice was sent to a large sampling of the proposed class. This led to having to respond to a large number of potential class member who had questions about their rights and often wanted to share information from their employment experiences, to see if it could support the case. I incurred approximately **37.6** hours related to these tasks.
- Significant discovery disputes arose in this case which required a Discovery Referee. I spent many of my hours billed preparing for and attending those hearings. Moreover, due to the fact that the Discovery Referee could only make "recommendations," a significant amount of time was spent on follow up hearing with Judge Katz who had the authority to issue "final" rulings. I incurred approximately **21.2** hours related to these tasks.
- Moreover, I spent significant time reviewing the tens of thousands of pages of document produced for use in the Class Certification Motion filed by our office. I incurred approximately **29.8** hours related to these tasks.
- I also primarily handled the settlement discussions. After a full day of mediation at did not result in a settlement, there were numerous numerous exchanges between the mediator, Defense counsel, and co-counsel to help negotiate and finalize the settlement following the progress made at a mediation. I incurred approximately **20.2** hours related to these tasks.
- Even after an agreement on the key terms of settlement was reached, numerous

1 exchanges and negotiation over final terms continued. As is exemplified in the
2 approval motions, numerous sub-classes had to be created and fair allocations
3 had to be apportioned for each sub-class. I incurred approximately **16.5** hours
4 related to these tasks.

- 5 • I also undertook the review and drafting of all settlement documents and the
6 preliminary approval motion. There were numerous class member inquiries that
7 I responded to following the class notice. I incurred approximately **32.1** hours
8 related to these tasks.

9 c. Mr. Ryan Kuhn served as the primary Associate Attorney assigned to the case. The
10 billing rate for Mr. Kuhn is **\$450.00** per hour. Mr. Kuhn expended approximately **479.6**
11 hours in the service of this action. **479.6** hours times **\$450.00** equals **\$215,820.00**. The
12 work performed consisted of, for the most part, analysis of Defendants' documents and
13 records, in preparation for mediation, a class certification motion, and to analyze
14 liability and damages for purposes of trial. Tens of Thousands of pages of documents
15 were produced over time throughout the litigation. By December of 2021, over 40,000
16 documents had already been produced. Mr. Kuhn was also assigned to discovery
17 creation/review, assisting with all discovery responses, the preparation of "meet and
18 confer" letters and other contact with defense counsel, and the drafting and filing of
19 numerous separate motions, including numerous different motions related to discovery.
20 Significant meet and confer attempts, and in some cases discovery motions had to be
21 filed, to obtain all required discovery. Mr. Kuhn also provided a detailed analysis of all
22 employment records to determine "commonality" and damages. Additional examples
23 of the work performed by Mr. Kuhn included:

- 24 • Mr. Kuhn was also heavily involved in the briefing of the motion for class
25 certification, which included the drafting and filing of two separate "Sur-
26 Replies." As to the briefing of the Motion for Class Certification (which
27 included research, review of Defendant's Oppositions and Sur-Replies, and
28 drafting the various pleadings), Mr. Kuhn incurred approximately **41.7** hours.

- 1 • Mr. Kuhn was heavily involved in the briefing of four separate *Ex Parte*
2 applications specifically related to the Motion for Class Certification. Mr. Kuhn
3 also attended all four of these *Ex Parte* conferences. As to the briefing and
4 attendance of these *Ex Parte* conferences, Mr. Kuhn incurred approximately
5 **27.4** hours.
- 6 • Over the course of this litigation, Mr. Kuhn spent a significant amount of time
7 reviewing the over 40,000 documents produced by Defendant. Mr. Kuhn has
8 incurred approximately **85.3** hours reviewing documents produced by
9 Defendant.
- 10 • Early on in this matter, the Court appointed a Discovery Referee (Judge
11 Bianchini). The appointment of the Discovery Referee often resulted in “double
12 time” being incurred as to the majority of discovery disputes, as several
13 disputes required an objection to a discovery recommendation to be brought
14 before Judge Katz. As a result of the discovery issues described above, Mr.
15 Kuhn has incurred approximately **56.6** hours.
- 16 • Mr. Kuhn was primarily involved in the preparation for the depositions of
17 Defendant’s Persons Most Knowledgeable. This preparation involved
18 significant document review, and analysis of Defendant’s policies and
19 procedures. A significant amount of time was also incurred in developing the
20 deposition script itself. Mr. Sullivan and Mr. Kuhn were both required to travel
21 from San Diego to Los Angeles to conduct the depositions. As a result of the
22 preparation and attendance of the PMK depositions, Mr. Kuhn incurred
23 approximately **49.7** hours. **Please Note:** Mr. Sullivan also incurred a significant
24 amount of time preparing for, and taking, the Persons Most Knowledgeable
25 depositions. However, as a standard practice, Mr. Sullivan has agreed to “**no**
26 **charge**” his time for preparation and attendance of these depositions

27 d. Based on past experience, I estimate that I will incur an additional 30 hours in assisting
28 Class Members on questions and issues regarding the settlement, meeting with Class

Members (including on any late submissions), and preparing for and attending the Final Approval hearing in this matter. 30 times \$660.00 equals **\$19,800.00**.

The Reasonableness of Plaintiff's Hourly Rates

13. I printed a copy of the Updated Laffey Matrix from the following website: www.laffeymatrix.com. A true and correct copy is attached as **Exhibit A**. While not binding, a trial court has discretion to use the Laffey Matrix when it comes to establishing attorneys' reasonable hourly rates in California State Courts. *See e.g. Syers Properties III, Inc. v. Rankin*, 236 Cal.App.4th 691, 702 (2014).
14. The referenced "Laffey" chart states that for the time periods in this case, for an attorney with over 20 years experience, the matrix states a reasonable fee is between \$899 - \$1057 per hour. Mr. Sullivan has well over 20 years experience working on class action litigation and bills at the rate of \$800 per hour. **Please Note:** While \$800 an hour may seem like a high figure at first glance, multiple Court's (including all San Diego Superior Court Judges) have accepted this figure for Mr. Sullivan. Moreover, this rate is justified given that "wage and hour" Class and/or Representative Action cases very rarely go to trial. Mr. Sullivan is one of the few attorneys who have (successfully) tried numerous of these types of cases. He has also successfully argued in front of the California Supreme Court in a Class and Representative action that is frequently cited in "wage and hour" litigation involving Meal Period claims. *Donohue v. AMN Services, LLC*, (2021) 11 Cal.5th 58.
15. For an attorney with 11-19 years experience, the matrix states a reasonable fee is between \$759 - \$878 per hour. I have over 14 years experience working on class action litigation and bill at the rate of \$660 per hour.
16. For an attorney with 4-7 years experience, the matrix states a reasonable fee is between \$538 - \$465 per hour. The associate Mr. Kuhn, who was working on this matter has over five years experience Mr. Kuhn and bills at the rate of \$450 per hour.
17. Accordingly, we submit our firm's rates are comparable to, or less than, those charged by other class action plaintiffs' counsel and the firms defending class actions.
18. The S+Y hourly rates have routinely been approved by both federal and state Courts, and have

1 been approved on more than 20 occasions within the last 3 years alone.

- 2 19. In a recent successful PAGA trial, tried before the San Diego Superior Court, our office was
3 awarded our full requested attorneys fees and was approved at the requested hourly rates
4 (which are similar to the fees/rates billed here). Please See *Carrington v. Starbucks Corp.* San
5 Diego Superior Court, Case No. 37-2014-00018637-CU-OE-CTL and published appellate
6 opinion 30 Cal.App.5th 504.

7 **Request for Reimbursement of Litigation Costs**

- 8 20. Class Counsel's total costs expended in this matter will be **\$33,855.89**. These costs are broken
9 down as follows:

- 10 a. Our office's costs expended in this matter totaled \$33,855.89. A detailed
11 spreadsheet of all costs incurred was contemporaneously prepared by our office
12 and is attached as **Exhibit B**.
- 13 b. As detailed herein, these costs included (1) filing and service fees, (2)
14 mediation fees, (3) research, (4) expert fees, (5) discovery referee fees, (6)
15 deposition transcript costs, (7) administrative case costs (postage and copies),
16 (8) expert fees, and (9) substantial fees related to travel for deposition and class
17 member interviews.

- 18 21. The parties' Agreement permits the Plaintiffs (without Opposition) to seek up to \$65,000.00
19 in costs. S + Y submits their request for the specific \$33,855.89 amount detailed in **Exhibit**
20 **B**.

21 **The Lodestar Multiplier**

- 22 22. Based upon my experience, I submit that the multiplier requested is within the range of what
23 California and federal courts often apply in class action cases. Moreover, the results obtained
24 here, versus the risk of a zero recovery, given the numerous asserted defenses, support this
25 modest multiplier request.
- 26 23. Given fees incurred here, a lodestar multiplier for S & Y's time incurred of 1.56 is necessary.
27 We recognize that the total combined lodestar figure will be calculated by our co-counsel.
28 Given co-counsel's experience, their additional work on the case added significant value and

further confirmed our opinion that the settlement was in the best interest of the class.

Class Representative Enhancement

24. Plaintiff Damon Coffey contributed extensive time and resources in the prosecution of this case, as is detailed further in his declaration. Plaintiff was able to provide information instrumental to the prosecution of this matter including identifying numerous witnesses that could corroborate the claims. Plaintiff also assisted with reviewing and providing insight on Defendant's documents produced. Plaintiff brought to our attention numerous Labor Code violations that formed the basis of the litigation.
25. I know (from experience) that any company who does a detailed background check, will be able to determine that Plaintiff is serving as class representatives in a lawsuit against their former employer.
26. An entire industry exists that allows employers to run extensive background searches on potential employees. Companies who provide these services specifically highlight the fact that their services allows employers to weed out litigious employment candidates. One such service outlines ways that employers can "get a sense of whether a prospective employee is likely to sue" the employer, through background checks and other means, to screen out these employees. www.reliableplant.com/Read/6959/a-solution-to-fear-of-hiring-litigious-employees. Onicra Credit Rating Agency of India states: "Background screening has become a necessity in today's litigious society." Back Track Screening also represents: "In today's litigious culture, employers simply cannot afford to hire employees who will put their company at risk." <http://www.btscreening.com/wp-content/uploads/2012/09/Screening-101.pdf>.
27. Finally, any employer may simply check the various Superior Court of California websites and conduct a party name search to uncover whether an applicant has previously filed litigation against their employer.
28. Plaintiff also risked personally owing a large cost award, which I estimate would be well into the tens of thousands of dollars, or even more, had the claims been unsuccessful. I know our costs were at least \$33,855.89, so it is likely Defendant's were a similar amount. Again, Plaintiff would have been liable for both of these amounts had he lost the case.

1 29. Despite all the risks Plaintiff, at all times remained committed to securing a monetary recovery
2 on behalf of the entire class. Specifically, Plaintiff never considered the possibility of a larger
3 individual settlement, in lieu of a recovery on behalf of the entire class.

4 30. Plaintiff went “above and beyond” what is usually required of a typical named class
5 representative. For example, Plaintiff Coffey was forced to relocate to Idaho for family reasons
6 during the pendency of this case. Despite that, he willingly flew back to San Diego on multiple
7 occasions to assist with the prosecution of the case.

8
9 I declare under penalty of perjury under the laws of the State of California that the foregoing
10 is true and correct. Executed this 2nd day of May, 2024 at San Diego, California.

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13 Eric K. Yaeckel
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EXHIBIT A

LAFFEY MATRIX

History

Case Law

See the Matrix

Contact us

Home

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375

6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363
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The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g.,DL v. District of Columbia, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $\frac{1}{2}$ Years Out of Law School $\frac{1}{2}$ is calculated from June 1 of each year, when most law students graduate. $\frac{1}{2}$ 1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $\frac{1}{2}$ 4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $\frac{1}{2}$ 1-3" from June 1, 1996 until May 31, 1999, would move into tier $\frac{1}{2}$ 4-7" on June 1, 1999, and tier $\frac{1}{2}$ 8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT B

LWDA	\$75.00		
Postage	\$97.95		
Knox	\$274.10		
US Legal Support	\$5,907.86		
One Legal	\$610.09		
LA Superior Court - research fee	\$127.75		
San Diego Superior Court	\$38.00		
Hotel for depo of Coffey	\$799.45	4/11-4/13/22	
Lunch	\$24.98	4/12/2022	
Client's air travel from Boise and return via Southwest Air	\$1,102.38		
Fuel for roundtrip client's home to Boise	\$142.01		
Best Western in Boise 4/10/22	\$252.96		
Boise Airport parking	\$34.00		
Avis rental car in San Diego	\$375.91		
Reimbursement to client re deposit	\$552.00		
Judicate West with Hon. Victor E. Bianchini, Ret.	\$3,700.00		
Naaegeli Deposition	\$2,236.75	8/18/2022	
Transportation for Depos 9/8/22-9/10/22	\$100.00		
Hotel for depo 9/8/22	\$860.19		
Hotel for depo 9/9/22	\$1,149.60		
Parking 9/10/22	\$43.00		
Eric Yaeckel travel to Boise	\$897.11	8/17-8/18/22	
Legal Research	\$1,292.00		
Copies	\$969.95		
Subtotal	\$21,663.04	1/17/2023	
Postage	\$197.92	1/20/2023	FedEx
One Legal	\$12.95	2/17/2023	
One Legal	\$78.19	2/22/2023	
One Legal	\$15.39	2/23/2023	
One Legal	\$13.33	2/24/2023	
Verizon security subpoena	\$83.00	3/20/2023	
One Legal	\$77.16	3/1/2023	
Knox	\$162.25	3/3/2023	
Postal Annex	\$5.85	4/14/2023	
One Legal	\$75.10	5/26/2023	
One Legal	\$16.42	6/13/2023	
Coffey Travel Expenses	\$955.72	8/18/2022	
Postage	\$26.16	8/2/2023	
Judicate West with Hon. Victor E. Bianchini, Ret.	\$9,513.75	8/3/2023	
One Legal	\$16.42	7/24/2023	
One Legal	\$12.95	8/11/2023	

One Legal	\$13.33	8/11/2023	
One Legal	\$17.45	9/15/2023	
One Legal	\$77.16	2/22/2023	
One Legal	\$78.19	1/2/2024	
One Legal	\$78.19	1/5/2024	
One Legal	\$15.39	1/24/2024	
One Legal	\$35.98	2/7/2024	
One Legal	\$15.39	2/7/2024	
One Legal	\$77.16	2/28/2024	
Judicate West with Hon. Victor E. Bianchini, Ret.	\$471.25	4/24/2024	
Supeior Court of San Diego	\$42.40	4/29/2024	
Supeior Court of San Diego	\$8.40	4/29/2024	
2nd Sub-total	\$33,855.89	4/30/2024	