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9 Attorneys for Plaintiff ERICK TORRES,
10 on behalf of himself and all others similarly situated

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF SAN BERNARDINO**
13

14 ERICK TORRES, on behalf of himself and all
15 others similarly situated,

16 Plaintiff,

17 v.

18 BECHTEL INFRASTRUCTURE AND
POWER CONSTRUCTION SERVICES, INC.,
19 a Delaware corporation, and DOES 1-50,
inclusive,

20 Defendants.
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Case No. CIVSB2134046

Assigned for All Purposes To:
Hon. Christian Towns
Dept.: S-26

**DECLARATION OF JAMES R. HAWKINS
IN SUPPORT OF MOTION FOR
APPROVAL OF SETTLEMENT PURSUANT
TO THE LABOR CODE PRIVATE
ATTORNEYS GENERAL ACT OF 2004
(LAB. CODE §§ 2698 ET SEQ.)**

Date: March 19, 2025
Time: 8:30 a.m.
Dept.: S-26

Complaint Filed: November 23, 2021
CMC: January 6, 2025
Trial: Not Set

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1. I am an individual over the age of 18. I am a principal to the Law Firm of James Hawkins, APLC. I am one of the attorneys of record for Plaintiff. I have personal knowledge of the facts set forth below, and if called to testify regarding them, I could and would do so competently.
2. I submit this Declaration in support of Plaintiff's Motion for Approval of Settlement Pursuant to the Labor Code Private Attorneys General Act of 2004 (the "PAGA Approval Motion").
3. I have no knowledge of the existence of any conflicting interests between my firm and any of its attorneys, my co-counsel's firms or any of their attorneys, and Plaintiff or any other Aggrieved Employee.
4. Based on the terms of the Settlement, and my experience as an established wage and hour class action litigator, I endorse this Settlement as being fair, adequate, and a reasonable compromise of the claims at issue, which is in the best interests of Plaintiff, the State, and the Aggrieved Employees.
5. Approval of the PAGA settlement is appropriate since the Settlement will provide significant monetary relief to the Settlement Class.

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- DECLARATION OF JAMES R. HAWKINS IN SUPPORT OF JOINT STIPULATION
REQUESTING APPROVAL OF PAGA SETTLEMENT

1 preliminarily appointed as Class Counsel. Case settled. Final approval granted, and funds
2 fully disbursed.

3 b. ***Dao v. 3M Company, et al.*** USDC, CENTRAL DISTRICT, Case No. CV-
4 08-04554. Wage and Hour Class Action case seeking past wages for “off the clock,”
5 overtime and meal and rest break violations for production workers in the State of
6 California. Plaintiffs’ Counsel appointed as Lead Counsel. Case settled, Final Approval
7 granted, no objections and funds fully distributed.

8 c. ***Ortiz v. Kmart***, USDC, CENTRAL DISTRICT, Case No. SACV 06-638
9 ODW. Wage and Hour Class Action case seeking past wages for meal and rest period
10 violations for retail employees in the State of California. Plaintiffs’ counsel appointed co-
11 lead counsel. Case settled, Final Approval granted, no objections and funds fully
12 distributed.

13 d. ***Morgan v. Aramark Campus, LLC***, USDC, CENTRAL DISTRICT, Case
14 No. SACV08-00412. Wage and Hour Class Action case seeking past wages for meal and
15 rest period violations for retail employees in the State of California. Plaintiffs’ Counsel
16 appointed as Lead Counsel. Case settled, Final Approval granted, no objections and funds
17 fully distributed.

18 e. ***West v Iron Mountain Information Management, Inc, et. al.***; Los Angeles
19 County Superior Court, Case No. BC393709. Wage and Hour Class Action seeking past
20 wages for overtime, meal, and rest break violations for driver employees in the State of
21 California. Stipulation for “binding arbitration.” Arbitration Award for Plaintiffs Class.
22 Arbitration Award confirmed. Plaintiffs’ counsel lead trial counsel and class counsel.

23 f. ***Gonzalez v. Superior Industries International, Inc., et al.***, Los Angeles
24 County Superior Court, Case No. BC 357912. Wage and Hour Class Action seeking past
25 wages for overtime, meal, and rest breaks violations for production employees in the State
26 of California. Plaintiffs’ counsel appointed as lead counsel. Case settled, Final Approval
27 granted, no objections and funds fully distributed.

1 g. ***Acosta v. Fleetwood Travel Trailers of California, Inc., et al.***, Riverside
2 County Superior Court, Case No. RIC 440630. Wage and Hour Class Action seeking past
3 wages for overtime, meal, and rest break violations for production employees in the State
4 of California. Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final
5 Approval granted, no objections and funds fully distributed.

6 h. ***Walker v. Sharkeez, et al.***, Orange County Superior Court, Case No.
7 05CC00293. Wage and Hour Class Action seeking past wages for unlawful deductions,
8 meal, and rest break violations for restaurant employees in the State of California.
9 Plaintiffs' counsel appointed as lead counsel. Case settled. Final Approval granted and
10 funds fully distributed.

11 i. ***Padron v. Universal Protection Service, et al***, Orange County Superior
12 Court, Case No. 05CC00013. Wage and Hour Class Action seeking past wages for
13 overtime, meal, and rest break violations for security officers in the State of California.
14 Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final Approval granted, no
15 objections and funds fully distributed.

16 j. ***Martinez v. Securitas Security Services USA, et al.***, Santa Clara Superior
17 Court, Case No. 105-CV047499, et al. J.C.C.P. No. 4460. Wage and Hour Class Action
18 seeking past wages for meal and rest break violations for security officers employed by
19 Defendants in the State of California. Plaintiffs' counsel and co-counsel. Case settled,
20 Final Approval granted and funds fully distributed.

21 k. ***Velasquez-Lopez v. Hotel Cleaning Services, Inc. et al.***, Riverside
22 Superior Court, Case No. RIC 420909. Wage and Hour Class Action seeking past wages
23 for overtime, meal and rest break violations for housekeepers employed by Defendants in
24 the State of California. Plaintiffs' counsel appointed as lead counsel. Case settled, Final
25 Approval granted, no objections and funds fully distributed.

26 l. ***Ruiz, et al. v. Unisource Worldwide, Inc., et al.***, USDC, CENTRAL
27 DISTRICT, Case No. CV09-05848. Wage and Hour Class Action seeking past wages for
28 meal and rest period violations for non-exempt employees employed by Defendants in the

1 state of California. Case settled. Awaiting Preliminary Approval hearing. Plaintiffs have
2 petitioned the Court for Lead Counsel.

3 m. **Herrador v. Culligan International Company, et al.**, USDC, CENTRAL
4 DISTRICT, Case No. SACV 08-680. Wage and Hour Class Action seeking past wages
5 for field and branch employees of Defendants in the State of California. Plaintiffs' counsel
6 appointed as lead counsel. Case settled and awaiting Final Approval.

7 n. **Defries v. Domain Restaurants, et al.**, Orange County Superior Court,
8 Case No. 05CC00128. Wage and Hour Class Action seeking past wages for restaurant
9 employees of Defendants in the State of California. Plaintiffs' counsel appointed as lead
10 counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

11 o. **Denton v. BLB Enterprises, Inc., et al.**, Orange County Superior Court,
12 Case No. 07CC01292. Wage and Hour Class Action seeking unpaid overtime, meal and
13 rest break violations for security guards employed by Defendants in the State of
14 California. Plaintiffs' counsel appointed as lead counsel. Case settled, Final Approval
15 granted, no objections and funds fully distributed.

16 p. **Rios v. Sandberg Furniture Manufacturing Co., Inc, et al.**, Los Angeles
17 Superior Court, Case No. BC411477. Wage and Hour Class Action seeking unpaid meal
18 and rest break violations for production employees employed by Defendants in the State
19 of California. Plaintiff's counsel appointed as lead counsel. Case settled, Final Approval
20 granted, no objections and funds fully distributed.

21 q. **McMurray v. Dave and Busters, Inc., et al.**, Orange County Superior
22 Court, Case No. 06CC00099. Wage and Hour Class Action seeking past wages for meal
23 and rest break violations for restaurant employees employed by Defendants in the State
24 of California. Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final
25 Approval granted, no objections and funds fully distributed.

26 r. **Osuna v. DFG Restaurants, Inc., et al.**, Los Angeles Superior Court, Case
27 No. BC 330145. Wage and Hour Class Action seeking past wages of overtime for
28 misclassification of managers employed by Defendant, DBA Carl's Jrs. in the State of

1 California. Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final Approval
2 granted, no objections and funds fully distributed.

3 s. ***Burns v. Gymboree Operations, Inc., et al.***, San Francisco Superior Court,
4 Case No. CGC-07-461612. Wage and Hour Class Action seeking past wages for meal and
5 rest break violations for retail employees employed by Defendants in the State of
6 California. Plaintiffs' counsel appointed lead counsel. Case settled, Final Approval
7 granted, no objections and funds fully distributed.

8 t. ***Willems v. Diedrich Coffee, Inc., et al.***, Orange County Superior Court,
9 Case No. 07CC00015. Wage and Hour Class Action seeking past wages of overtime for
10 misclassification of managers employed by Defendants in the State of California.
11 Plaintiffs' counsel appointed lead counsel. Case settled, Final Approval granted, no
12 objections and funds fully distributed.

13 u. ***Davila, et al. v. Beckman Coulter, Inc., et al.***, Orange County Superior
14 Court, Case No. 07CC01347. Wage and Hour Class Action seeking past wages for
15 overtime, meal and rest break violations for production workers employed by Defendants
16 in the State of California. Plaintiffs' counsel appointed lead counsel. Case settled, Final
17 Approval granted, no objections and funds fully distributed.

18 v. ***Perez v. Naked Juice Company of Glendora, Inc.***, Los Angeles Superior
19 Court, Case No. BC387088. Wage and Hour Class Action seeking past wages for
20 overtime, meal and rest period violations for production employees employed by
21 Defendants in the State of California. Plaintiff's counsel appointed as lead counsel. Case
22 settled. Final Approval granted, no objections and funds fully distributed.

23 w. ***Coordination Proceeding Special Title [Rule 1550(b)] Wackenhut Wage***
24 ***and Hour Cases***, Los Angeles Superior Court, Case No. JCCP 4545. Wage and Hour
25 Class Action seeking past wages for overtime, meal and rest period violations for security
26 guards employed by Defendants in the State of California. Certification granted.
27 Plaintiffs' counsel appointed as co-lead counsel. Writ taken. Court stays action pending
28 Appellate Court ruling. Court lifts stay.

1 x. **Placencia v. Amcor Packaging Distribution, Inc.**, Orange County Superior
2 Court, Case No. 30-2013-00694012-CU-OE-CXC. Wage and Hour Class Action seeking
3 past wages for overtime, meal and rest period violations, and penalties on behalf of non-
4 exempt production, maintenance, shipping, and receiving employees employed by
5 Defendants in California. Plaintiff's counsel appointed as lead counsel. Case settled. Final
6 Approval granted, no objections and funds fully distributed.

7 y. **Trani v. Lisi Aerospace, et al.**, Los Angeles Superior Court, Case No.
8 BC495527. Wage and Hour Class Action seeking past wages for overtime, meal and rest
9 period violations, and penalties on behalf of non-exempt manufacturing employees
10 employed by Defendants in California. Plaintiff's counsel appointed as lead counsel. Case
11 settled. Final Approval granted, no objections and funds fully distributed.

12 z. **Galvan v. Goodwin Co.**, Orange County Superior Court, Case No. 30-2013-
13 00637062-CU-OE-CXC, Wage and Hour Class Action seeking past wages for meal
14 period violations, and non-compliant wage statements on behalf of non-exempt
15 production employees employed by Defendants in California. Plaintiff's counsel
16 appointed as lead counsel. Case settled. Final Approval granted, no objections and funds
17 fully distributed.

18 aa. **Reyes v. Bristol Fiberlite**, Orange County Superior Court, Case No. 30-
19 2013-00653425-CU-OE Action seeking past wages for overtime, meal and rest period
20 violations, inaccurate wage statements, and penalties on behalf of non-exempt employees
21 employed by Defendants in California. Plaintiff's counsel appointed as lead counsel. Case
22 settled. Final Approval granted, no objections and distribution of funds pending.

23 bb. **Gutierrez v. HMT Tank**, USDC Central Dist., Case No. CV14-1967-
24 CAS(MAN) Wage and Hour Class Action seeking past wages for meal and rest period
25 violations, failure to indemnify necessary expenses, inaccurate wage statements, and
26 penalties on behalf of non-exempt employees working in positions related to servicing,
27 refabricating, and repairing storage tanks employed by Defendants in California.
28

1 Plaintiff's counsel appointed as lead counsel. Case settled. Final Approval granted, no
2 objections and funds fully distributed.

3 cc. **Williams v. Il Fornaio America Corp.**, Sacramento County, Case No. 34-
4 2011-0009616. Wage and Hour Class Action seeking past wages for overtime, meal and
5 rest period violations, reimbursements, and penalties on behalf of non-exempt restaurant
6 employees employed by Defendants in California. Plaintiff's counsel appointed as lead
7 counsel. Case settled. Final Approval granted, and funds fully distributed.

8 dd. **Aguilar v. 7-Eleven, Inc.**, Orange County, Case No. 30-2009-002687141-
9 CU-OE-CXC. Wage and Hour Class Action seeking past wages for overtime, meal and
10 rest period violations, and penalties on behalf of non-exempt retail clerks employed by
11 Defendants in California. Plaintiff's counsel appointed as lead counsel. Case settled. Final
12 Approval granted, no objections and funds fully distributed.

13 ee. **Madrigal v. Huntington Beach Market Broiler, Inc.**, Orange County, Case
14 No. 30-2012-00611260. Wage and Hour Class Action seeking past wages for overtime,
15 meal and rest period violations, reimbursements, and penalties on behalf of non-exempt
16 employees employed by Defendants in California. Plaintiff's counsel appointed as lead
17 counsel. Case settled. Final Approval granted, no objections and funds fully distributed.

18 ff. **Vang v. Jazz Semiconductor, Inc.**, Orange County, Case no. 30-2011-
19 00460278. Wage and Hour Class Action seeking past wages for overtime, meal and rest
20 period violations, reimbursements, and penalties on behalf of non-exempt production
21 workers employed by Defendants in California. Plaintiff's counsel appointed as lead
22 counsel. Case settled. Final Approval granted, no objections and funds fully distributed.

23 gg. **Cano v. Financial Statement Services, Inc.**, Orange County, Case No. 30-
24 2013-00653349-CU-OE-CXC.

25 hh. **Gonzalez v. Quality Aluminum Force, LLC**, Orange County, Case No. 30-
26 2015-00817941-CU-OE-CXC.

27 ii. **Smith v. Space Exploration Technologies Corp.**, Los Angeles County
28 Case No. BC554258.

1 jj. ***Madrigal v. Balda C Brewer, Inc.***, Orange County Case No. 30-2015-
2 00820218-CU-OE-CXC.

3 kk. ***Mendez v. Liberty Glass Fabricators, Inc.***, Riverside County Case No. RIC
4 1800119. -CXC. Wage and Hour Class.

5 ll. ***Attia v. Neiman Marcus Group, Inc.***, United States District Court for the
6 Central District of California Case No. 8:16-cv-001504-DOC-FFM

7 mm. ***Vigueras v. Red Robin***, United States District Court for the Central District
8 of California Case No. 8:17-cv-1422-JVS-DFM.

9 nn. ***Payne v. Marriott Ownership Resorts, Inc.***, San Diego County Case No.
10 37-2018-00015175-CU-OE-CTL.

11 7. In sum, my firm has been the lead or co-lead counsel in hundreds of cases since its
12 inception. We have recovered hundreds of millions of dollars for employees in the State of
13 California and millions for the State as well through PAGA.

14 8. Our firm has served as class counsel in a number of significant wage and hour
15 settlements. Of particular note, in 2019, our firm was co-lead counsel in securing the largest wage
16 and hour class action settlement in California history at \$130,000,000. During this case, plaintiffs
17 appealed a decertification order. This case involved several appeals. The appellate record amassed
18 an extensive appellate record comprising a 23-volume joint appendix, a three-volume reporters'
19 transcript, five briefs, four letter briefs, two motions for judicial notice, a motion to augment the
20 record, and several additional letters informing the appellate court of new legal authority issued
21 after *Dukes*. The matter was argued to and submitted by the Court of Appeal on September 15,
22 2016, and on November 21, 2016, the decertification order was reversed, and the case was
23 remanded for further proceedings. (*Lubin v. The Wackenhut Corporation* (“*Lubin*”), 5 Cal. App.
24 5th 960 (2016)). Wackenhut filed a petition for review of the Court of Appeal decision to the
25 California Supreme Court. The Supreme Court denied Wackenhut’s petition for review of *Lubin*.
26 The Court of Appeal issued remittitur on April 10, 2017. Eventually through more litigation, the
27 parties were able to secure the \$130 million settlement that was approved on October 21, 2019, by
28 Judge Highberger in the Los Angeles Superior Court.

1 9. Additionally, in early 2020, our firm served as lead counsel in a class action jury
2 trial in the Central District of California involving the class and PAGA representative claims of
3 over 23,000 employees which successfully resolved in the midst of trial for \$8,500,000.

4 10. Our firm has settled many high-stakes class and representative actions. Hawkins'
5 settlements have directly compensated hundreds of thousands of California workers and
6 consumers. Hawkins' actions have also forced employers to modify their policies for the benefit
7 of employees including changing the compensation structure for certain employees and changing
8 practices to ensure that workers will be able to take timely rest and meal breaks. A leader in
9 prosecuting class and PAGA enforcement actions, my firm has secured millions of dollars for
10 workers and in civil penalties for the State of California.

11 11. Based on our experience, demonstrated competence, resources to prosecute the
12 claims at issue and reputation among our colleagues in the both the defense and plaintiffs' bar, I
13 respectfully submit our firm's experience in the field of wage and hour cases provides us the ability
14 to prosecute claims swiftly and often times without the need for protracted litigation as here.
15 Although, as demonstrated in the Wackenhut cases, we do not give up fighting for class members
16 and aggrieved employees when challenged and necessary.

17 12. Based on this wealth of experience, it continues to be my opinion that this
18 Settlement is fair, reasonable, and adequate, and in the best interest of the stakeholders, the State
19 and the Aggrieved Employees. The Settlement is a good result by any measure, particularly so
20 considering Defendants' formidable arguments against liability and damages. In light of these
21 issues, and the fact that the Settlement was the product of protracted, contentious, and arm's-length
22 negotiations between highly experienced counsel with the assistance of a well-respected neutral
23 third-party mediator, I believe that the Settlement should be granted final approved.

24 **CLASS COUNSEL FEES AND LITIGATION EXPENSES PAYMENT**

25 13. Class Counsel seeks an award of \$149,166.67 in attorneys' fees, which represents
26 one-third of the Gross Settlement Amount. (Settlement Agreement, ¶¶ 1.20, 3.2.2.) Given the
27 extensive efforts of counsel, one-third of the Gross Settlement Amount is respectfully believed to
28 be a reasonable award. Plaintiff's Counsel has borne the entire risk and cost of this litigation on a

1 pure contingency basis. The legal issues raised in this case were complex and drew significantly
2 upon Counsel's wage and hour experience. The proposed attorneys' fees accurately reflect the
3 legal marketplace and are within the range of customarily approved fees by California courts.

4 14. Despite the complexity of the case, Counsel has, through our investment of
5 substantial effort and resources, secured an outstanding settlement on behalf of the Aggrieved
6 Employees. The issues and arguments Counsel has encountered and overcome in arriving at the
7 parties' negotiated settlement terms were also many and complex and required skillful advocacy
8 that can arise only out of experience, professional perspective, and success. Plaintiff would have
9 faced substantial legal and factual obstacles in demonstrating the merits of his case, given
10 Defendants' asserted defenses. Still, Plaintiff's Counsel has negotiated a substantial settlement on
11 behalf of the Aggrieved Employees for such claims. Plaintiff would have also been required to
12 establish a significant amount of witness testimony, pattern and practice evidence, statistical
13 evidence, sampling evidence, expert testimony, and other evidence in order to evaluate and present
14 arguments trial. Defendants have vigorously challenged the claims pled in the operative complaint,
15 contested liability and the amount of damages claimed, and would have continued to do so through
16 trial. Accordingly, Plaintiff's Counsel believes the Settlement to be fair, reasonable, and adequate
17 and that it is in the best interest of the Aggrieved Employees. The fairness and adequacy of the
18 Settlement is confirmed by all known facts and circumstances, including the risk of significant
19 delay and uncertainty associated with litigation, the various defenses asserted by Defendant, and
20 numerous potential appellate issues.

21 15. We respectfully submit the fees and costs provision of the Settlement is fair and
22 reasonable both when cross-checked under the lodestar and common fund method. The total
23 billable hours invested, and which will be invested in prosecuting this action and the related actions
24 which gave rise to the Settlement, should this Honorable Court approve the settlement, is
25 substantial. I respectfully submit that our fees and costs request is fair and reasonable because our
26 office has expended substantial time and effort in achieving the proposed Settlement, including
27 the following tasks: investigating the factual and legal basis of the action; intake and investigation;
28 analyzing documents provided by Plaintiff, including time and payroll documents and policy

1 documents; conferences with clients; witness interviews; investigating Defendants' organization
2 and structure from publicly available information; reviewing and revising the complaints for two
3 separate actions and consulting on strategy; reviewing arbitration documents and strategy
4 regarding arbitration proceedings; conferences regarding arbitration proceedings; conferences
5 regarding mediation preparation; reviewing and analyzing thousands of pages of documents,
6 including policy documents and a significant volume of time and payroll data; conferences
7 regarding the claims alleged in this action, and the information needed for analysis; compiling
8 relevant data; working with an expert and preparing complex damages analysis and extrapolation
9 of damages to the aggrieved group; research regarding relevant issues; preparing for and attending
10 a full day of mediation; revising and finalizing a Settlement with Defendants' Counsel following
11 mediation; reviewing and revising the approval motion and supporting papers. As such, I
12 respectfully submit that a lodestar cross-check supports the reasonableness of the requested fees.

13 16. I submit that the requested attorneys' fees of one-third the Gross Settlement
14 Amount that PAGA Counsel has obtained is fair and reasonable, as are the hourly rates at which
15 our attorneys bill.

16 17. I am the founding partner at James Hawkins, APLC and have devoted a significant
17 number of hours in prosecuting this case on behalf of Plaintiff and the Aggrieved Employees. In
18 1993, I graduated from the University of California, Los Angeles with a Bachelor of Arts Degree.
19 Following graduation, I attended Whittier Law School. In 1996, while a full-time law student, I
20 was also a full-time Judicial Extern for the Honorable Consuelo B. Marshall, United States District
21 Court, Central District. After approximately five months of service for Judge Marshall, I became
22 a full-time extern for the United States Attorney's Office, Central District of California. My
23 externship lasted for approximately five months. Thereafter, in 1997, I graduated from Whittier
24 Law School. The same year, I was admitted to practice law in the State of California. Since its
25 inception, this law firm has been exclusively involved in class action and complex litigation. In
26 2009, I opened an additional office in Miami, Florida, prosecuting wage and hour class actions.
27 Since 2002, I have been lead counsel or co-lead counsel in hundreds of wage and hour class
28 actions. My hourly rate is \$1,050.00 per hour. I have expended approximately 78.40 hours in

litigating this case. The following is a summary of my tasks and activities in prosecuting this matter: intake; review due diligence; legal and factual research; witness interviews; extensive investigation and document review in connection with the filing of the complaints; notes in connection with the due diligence; reviewing related cases; reviewing and revising pleadings; strategy with attorneys; conferences with clients; reviewing and revising motions and oppositions; reviewing informal discovery; mediation preparation; conferences with expert; conferences re damages model and settlement; conferences with co-counsel; reviewing and revising settlement-related documentation; and reviewing relevant documentation regarding the claims and defenses. The number of hours I have expended (and will expend) for work performed and the corresponding attorney's fees of approximately \$82,320.00 are reasonable and necessary.

18. Our paralegal, Melissa Whitson, has dedicated (or will dedicate) over 40.90 hours assisting with the prosecution of this case. She has assisted with mediation preparation, working with the expert, compiling and summarizing data and documentation, and generally assisted with the prosecution of this matter. Her hourly rate is \$200.00 per hour. The number of hours expended for work performed and the corresponding fees of \$8,180.00 are reasonable and necessary.

19. The number of hours (119.30) James Hawkins, APLC has spent working on this litigation was necessary and reasonable in pursuit of the Settlement. The lodestar for James Hawkins APLC is approximately \$90,500.00. This is exclusive of the additional amounts invested by my co-counsel in this case. I submit that the requested attorneys' fees of one-third of the Gross Settlement Amount that Counsel has obtained to resolve the actions is fair and reasonable, as are the hourly rates at which our attorneys bill.

James Hawkins APLC Lodestar Summary				
Timekeeper	Years	Hours	Rate	Total
James Hawkins, Esq.	26	78.40	\$1050	\$82,320.00
Paralegal Staff		40.90	\$200	\$8,180.00
TOTALS		119.30		\$90,500.00

20. We respectfully submit that our hourly rates are reasonable in light of the hourly rates charged in the marketplace for comparable skill, years of experience and services. A true and correct copy of the 2021 Wolters Kluwer Real Rate Report, attached as **Exhibit 6**, and the Laffey

1 Matrix, attached as **Exhibit 7**. I believe James Hawkins, APLC's hourly rates are in line with, and,
2 in fact are modest compared with the hourly rates of other counsel in similar actions.

3 21. As set forth in my co-counsel's declaration, the Settlement achieved is a fair,
4 reasonable, and adequate resolution of the Action in light of the claims and defenses at issue.

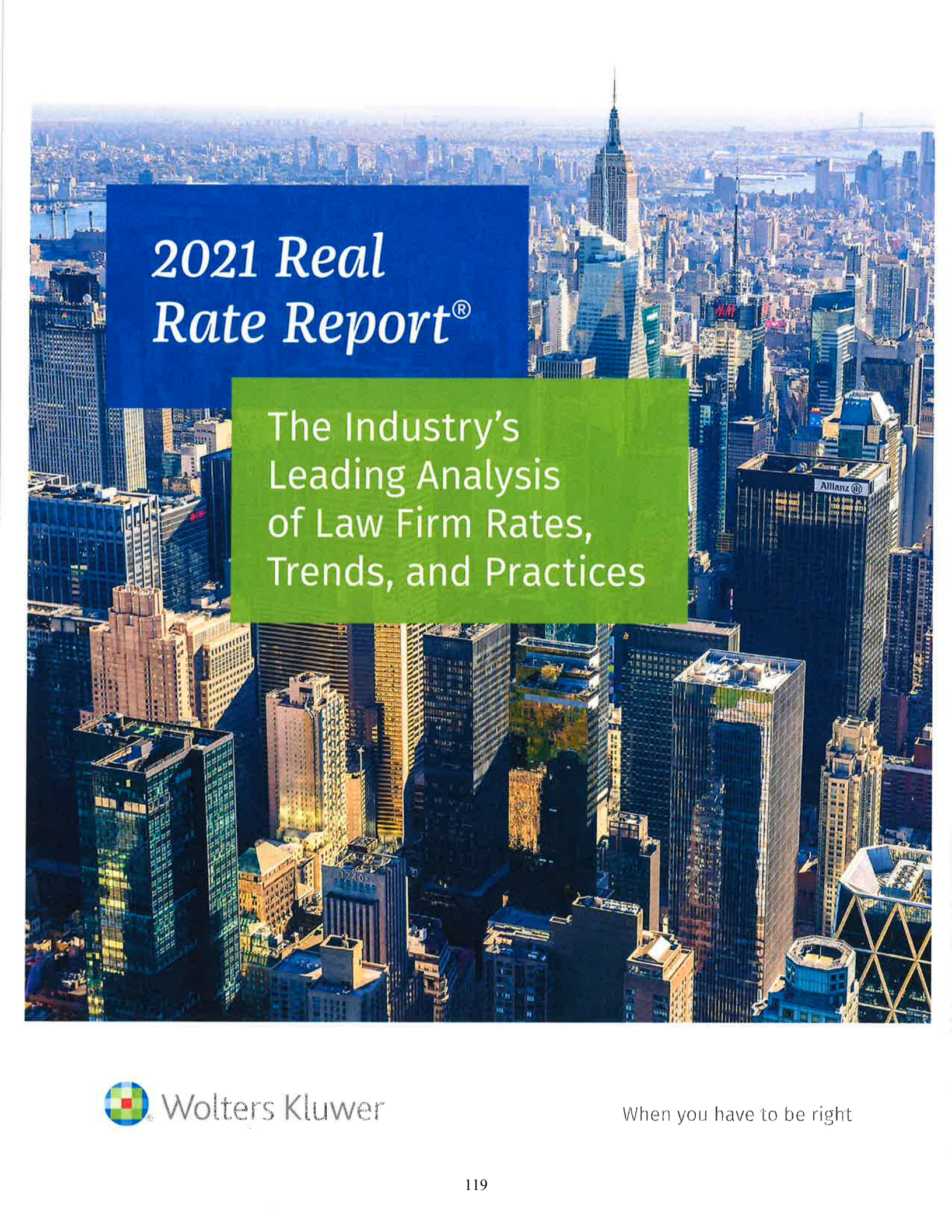
5 22. The Settlement that Counsel has negotiated on behalf of the Aggrieved Employees
6 confronts very difficult and potentially individualized issues which make trial on the merits
7 challenging. I and our firm's attorneys and paralegals, along with co-counsel, have secured this
8 Settlement through persistent advocacy of the claims, which has applied legal nuances and
9 negotiation techniques to achieve a very favorable result under the circumstances. Other attorneys
10 without our experience and comprehensive knowledge and perspective in connection with
11 complex employment litigation may not have been able to achieve such superior settlement terms
12 on behalf of the Aggrieved Employees. I believe the requested amount of attorneys' fees under
13 the Settlement is a reasonable allocation given the excellent result we have achieved. I, therefore,
14 respectfully request the Court approve the allocated attorneys' fees under the Parties' Settlement.

15 23. In serving as PAGA Counsel in this action and the related actions which ultimately
16 led to the Settlement, my firm will also seek reimbursement for the out-of-pocket costs of
17 \$16,316.00 for the prosecution of the claims. This does not include the costs incurred by our co-
18 counsel. A summary of the costs incurred by our firm to date in this action is attached herewith
19 as **Exhibit 8**. I believe that all of these fees and costs are reasonable and necessarily incurred in
20 litigating this matter and in pursuit of the settlement.

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct. Executed on December 9, 2024, at Irvine, California.

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25 James R. Hawkins
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EXHIBIT 6

An aerial photograph of the New York City skyline, featuring numerous skyscrapers and the Empire State Building prominently in the background. The image is used as a background for the report cover.

2021 Real Rate Report®

The Industry's
Leading Analysis
of Law Firm Rates,
Trends, and Practices



Wolters Kluwer

When you have to be right



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LEGAL CAVEAT

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Table of Contents - 2021 Real Rate Report

A Letter to Our Readers • 4

Report Use Considerations • 5

Section I: High-Level Data Cuts • 9

- Partners, Associates, and Paralegals
- Partners, Associates, and Paralegals by Practice Area and Matter Type
- Partners and Associates by City
- Partners and Associates by City and Matter Type
- Partners by City and Years of Experience
- Associates by City and Years of Experience
- Partners and Associates by Firm Size and Matter Type

Section II: Industry Analysis • 64

- Partners, Associates, and Paralegals by Industry Group
- Partners and Associates by Industry Group and Matter Type
- Basic Materials and Utilities
- Consumer Goods
- Consumer Services
- Financials (Excluding Insurance)
- Health Care
- Industrials
- Technology and Telecommunications

Section III: Practice Area Analysis • 85

- Bankruptcy and Collections
- Commercial
- Corporate: Mergers, Acquisitions, and Divestitures
- Corporate: Regulatory and Compliance
- Corporate: Other
- Employment and Labor
- Environmental
- Finance and Securities
- General Liability (Litigation Only)
- Insurance Defense (Litigation Only)
- Intellectual Property: Patents
- Intellectual Property: Trademarks
- Intellectual Property: Other
- Real Estate

Section IV: In-Depth Analysis for Select US Cities • 175

- Boston, MA
- Chicago, IL
- Los Angeles, CA
- New York, NY
- Philadelphia, PA
- San Francisco, CA
- Washington, DC

Section V: International Analysis • 195

Section VI: Matter Staffing Analysis • 227

Appendix: Data Methodology • 232

A Letter to Our Readers

Welcome to the Wolters Kluwer's ELM Solutions Real Rate Report®, the industry's leading data-driven benchmark report for lawyer rates.

Our Real Rate Report has been a relied upon data analytics resource to the legal industry since its inception in 2010 and continues to evolve. The Real Rate Report is powered by Wolters Kluwer's ELM Solutions LegalVIEW® data warehouse, the world's largest source of legal performance benchmark data, which has grown to include over \$150 billion in anonymized legal data.

This year, we launched our LegalVIEW Insights Report series, which explores the emerging trends behind the overall legal spend volatility seen in corporate legal departments. The insights reports coupled with the Real Rate Report are great tools to drive actionable decisions.

The legal services industry relies on internal analytics and the use of external data resources, such as the LegalVIEW® data warehouse, to support legal management strategies. The depth and details of the data in the Real Rate Report enable you to better benchmark and make more informed investment and resourcing decisions for your organization.

As with past Real Rate Reports, all of the data analyzed are from corporations' and law firms' e-billing and time management solutions. We have included lawyer and paralegal rate data filtered by specific practice and sub-practice areas, metropolitan areas, and types of matters to give legal departments and law firms greater ability to pinpoint areas of opportunity. We strive to make the Real Rate Report a valuable and actionable reference tool for legal departments and law firms.

As always, we welcome your comments and suggestions on what information would make this publication more valuable to you. We thank our data contributors for participating in this program. And we thank you for making Wolters Kluwer's ELM Solutions your trusted partner for legal industry domain expertise, data, and analytics and look forward to continuing to provide market-leading, expert solutions that deliver the best business outcomes for collaboration among legal departments and law firms.

Sincerely,



Barry Ader

Vice President, Product Management and Marketing
Wolters Kluwer's ELM Solutions

Report Use Considerations

2021 Real Rate Report

- Examines law firm rates over time
- Identifies rates by location, experience, firm size, areas of expertise, industry, and timekeeper role (i.e., partner, associate, and paralegal)
- Itemizes variables that drive rates up or down

All the analyses included in the report derive from the actual rates charged by law firm professionals as recorded on invoices submitted and approved for payment.

Examining real, approved rate information, along with the ranges of those rates and their changes over time, highlights the role these variables play in driving aggregate legal cost and income. The analyses can energize questions for both corporate clients and law firm principals.

Clients might ask whether they are paying the right amount for different types of legal services, while law firm principals might ask whether they are charging the right amount for legal services and whether to modify their pricing approach.

Some key factors¹ that drive rates²:

Attorney location - Lawyers in urban and major metropolitan areas tend to charge more when compared with lawyers in rural areas or small towns.

Litigation complexity - The cost of representation will be higher if the case is particularly complex or time-consuming; for example, if there are a large number of documents to review, many witnesses to depose, and numerous procedural steps, the case is likely to cost more (regardless of other factors like the lawyer's level of experience).

Years of experience and reputation - A more experienced, higher-profile lawyer is often going to charge more, but absorbing this higher cost at the outset may make more sense than hiring a less expensive lawyer who will likely take time and billable hours to come up to speed on unfamiliar legal and procedural issues.

Overhead - The costs associated with the firm's support network (paralegals, clerks, and assistants), document preparation, consultants, research, and other expenses.

Firm size - The rates can increase if the firm is large and has various timekeeper roles at the firm. For example, the cost to work with an associate or partner at a larger firm will be higher compared to a firm that has one to two associates and a paralegal.

Rates increase in geographic areas with growing population

Additional analysis was performed to examine the impact of geographic location on law firm hourly rates. This report, like previous ones, shows that large, cosmopolitan legal services markets like New York City, San Francisco, and Los Angeles are associated with higher hourly rates. In addition, our analysis reveals a significant spike in hourly rates in areas of the country

¹ David Goguen, J.D., University of San Francisco School of Law (2020) Guide to Legal Services Billing Retrieved from: <https://www.lawyers.com/legal-info/research/guide-to-legal-services-billing-rates.html>

² Source: 2018 RRR. Factor order validated in multiple analyses since 2010

Report Use Considerations

that are currently experiencing high population growth. Significant average rate increases occurred from 2020 to 2021 in many areas, but especially Fresno, California (~15% average rate increase), Greenville, SC (~18%), Miami, FL (~9%), Nashville, TN (~11%), Oklahoma City (~13%), Phoenix, AZ (~10%), and Seattle, WA (~11%) -- all of which have experienced much higher than average population growth in recent years.

The correlation between hourly rates and population growth makes sense. When people and businesses move into an area, it creates a spike in demand for all sorts of goods and services, including legal services. However, it is hard for the supply of legal services to move as quickly as demand because attorneys looking to move into a new geographic area face high switching costs that most will refuse to pay unless they absolutely have to.

First, attorneys looking to take work in a new state have to get licensed there, which takes time and effort and is a distraction that can reduce their current income in the form of the number of hours they are able to bill to clients. Second, despite the rise in remote working, many attorneys looking to establish practices in a new geographic location may have to establish at least some physical presence there, find a new office, new lodging, and potentially uproot their entire family. Third, even if the switching costs of licensure, physically moving, etc. are paid, attorneys may fear yet another switching cost in the form of attrition of their existing clients from their original geographic locale, who may view them as no longer investing in their knowledge of the legal problems and legal solutions that are specific to the original locale.

³ Source: 2020 RRR. Factor order validated in multiple analyses since 2010

Section I: High-Level Data Cuts

Cities

By Matter Type

2021 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2021	2020	2019
Kansas City MO	Non-Litigation	Associate	95	\$250	\$320	\$385	\$323	\$288	\$278
		Partner	14	\$285	\$350	\$484	\$402	\$445	\$413
Las Vegas NV	Non-Litigation	Partner	19	\$250	\$300	\$445	\$375	\$421	\$480
		Associate	12	\$238	\$323	\$377	\$320	\$282	\$280
Little Rock AR	Non-Litigation	Partner	12	\$215	\$215	\$300	\$267	\$290	\$274
Los Angeles CA	Litigation	Partner	342	\$475	\$715	\$1,042	\$759	\$708	\$694
		Associate	433	\$402	\$602	\$806	\$610	\$583	\$535
Los Angeles CA	Non-Litigation	Partner	559	\$600	\$880	\$1,160	\$894	\$872	\$816
		Associate	761	\$480	\$685	\$895	\$696	\$665	\$620
Louisville KY	Litigation	Partner	18	\$265	\$356	\$405	\$344	\$353	\$338
		Associate	16	\$178	\$200	\$278	\$225	\$227	\$214
Louisville KY	Non-Litigation	Associate	12	\$208	\$215	\$249	\$224	\$230	\$197
		Partner	15	\$244	\$389	\$529	\$421	\$424	\$430
Madison WI	Non-Litigation	Partner	15	\$244	\$389	\$529	\$421	\$424	\$430
Memphis TN	Litigation	Partner	16	\$290	\$415	\$425	\$364	\$355	\$347
		Associate	20	\$298	\$340	\$369	\$345	\$346	\$334
Miami FL	Litigation	Partner	100	\$282	\$475	\$614	\$465	\$473	\$453

Section I: High-Level Data Cuts

Cities

By Years of Experience

2021 - Real Rates for Associate

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2021	2020	2019
Jackson MS	7 or More Years	22	\$55	\$55	\$183	\$124	\$125	\$183
Kansas City MO	3 to Fewer Than 7 Years	26	\$252	\$310	\$349	\$306	\$294	\$292
	7 or More Years	28	\$295	\$325	\$370	\$325	\$283	\$282
Los Angeles CA	Fewer Than 3 Years	70	\$494	\$533	\$622	\$543	\$511	\$413
	3 to Fewer Than 7 Years	128	\$533	\$709	\$821	\$673	\$582	\$510
	7 or More Years	164	\$412	\$565	\$841	\$629	\$604	\$576
Miami FL	3 to Fewer Than 7 Years	14	\$277	\$340	\$408	\$364	\$323	\$323
	7 or More Years	30	\$310	\$475	\$540	\$431	\$429	\$374
Minneapolis MN	3 to Fewer Than 7 Years	23	\$330	\$351	\$462	\$394	\$388	\$355
	7 or More Years	26	\$326	\$448	\$580	\$441	\$397	\$384
Nashville TN	7 or More Years	13	\$245	\$283	\$325	\$287	\$271	\$253
New Orleans LA	3 to Fewer Than 7 Years	13	\$235	\$238	\$280	\$251	\$260	\$248
	7 or More Years	13	\$260	\$340	\$364	\$324	\$326	\$276
New York NY	Fewer Than 3 Years	160	\$440	\$590	\$775	\$629	\$560	\$513
	3 to Fewer Than 7 Years	237	\$412	\$670	\$875	\$681	\$625	\$559

Section I: High-Level Data Cuts

Cities

By Years of Experience

2021 - Real Rates for Partner

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2021	2020	2019
Los Angeles CA	Fewer Than 21 Years	173	\$550	\$855	\$1,065	\$815	\$724	\$703
	21 or More Years	332	\$527	\$725	\$1,145	\$844	\$818	\$758
Memphis TN	Fewer Than 21 Years	11	\$283	\$300	\$340	\$317	\$324	\$309
	21 or More Years	17	\$365	\$415	\$425	\$391	\$379	\$370
Miami FL	Fewer Than 21 Years	44	\$408	\$540	\$583	\$503	\$484	\$485
	21 or More Years	99	\$414	\$550	\$750	\$569	\$564	\$532
Milwaukee WI	Fewer Than 21 Years	14	\$306	\$358	\$433	\$373	\$355	\$323
	21 or More Years	26	\$375	\$470	\$545	\$535	\$530	\$431
Minneapolis MN	Fewer Than 21 Years	41	\$400	\$520	\$604	\$513	\$515	\$478
	21 or More Years	82	\$450	\$659	\$789	\$619	\$591	\$579
Nashville TN	Fewer Than 21 Years	27	\$375	\$464	\$495	\$436	\$413	\$374
	21 or More Years	49	\$420	\$470	\$536	\$481	\$472	\$433
New Orleans LA	Fewer Than 21 Years	24	\$275	\$305	\$390	\$346	\$361	\$337
	21 or More Years	40	\$295	\$332	\$412	\$352	\$373	\$369
New York NY	Fewer Than 21 Years	456	\$656	\$1,044	\$1,407	\$1,033	\$987	\$938

Section I: High-Level Data Cuts

Cities

By Role

2021 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Role	n	First Quartile	Median	Third Quartile	2021	2020	2019
Little Rock AR	Partner	16	\$215	\$250	\$300	\$272	\$287	\$282
Los Angeles CA	Partner	786	\$536	\$822	\$1,101	\$843	\$808	\$766
	Associate	1,110	\$450	\$653	\$860	\$664	\$636	\$587
Louisville KY	Partner	25	\$278	\$355	\$400	\$348	\$363	\$348
	Associate	25	\$180	\$210	\$264	\$224	\$228	\$210
Madison WI	Partner	15	\$241	\$389	\$536	\$419	\$435	\$440
Memphis TN	Partner	30	\$290	\$351	\$415	\$354	\$351	\$342
Miami FL	Partner	226	\$360	\$530	\$675	\$525	\$524	\$516
	Associate	149	\$265	\$361	\$475	\$375	\$381	\$365
Milwaukee WI	Partner	52	\$316	\$390	\$476	\$452	\$450	\$387
	Associate	36	\$270	\$305	\$358	\$316	\$305	\$269
Minneapolis MN	Partner	175	\$419	\$595	\$711	\$578	\$544	\$531
	Associate	137	\$295	\$406	\$521	\$405	\$377	\$376
Nashville TN	Partner	108	\$375	\$468	\$535	\$463	\$457	\$414
	Associate	73	\$252	\$311	\$338	\$305	\$283	\$257

EXHIBIT 7

LAFFEY MATRIX

[History](#)
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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
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

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 8

Matter Billing Detail

JAMES HAWKINS APLC

Date Range: 01/01/1900 to 11/25/2024
Client: BECHTEL - Erick Torres
Matter: BECHTEL003 - Bechtel Infrastructure and Power Const.-PAGA- Erick Torres

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
11/22/2021	FST	First Legal Network - Filing Branch PDF next day , Complaint, summons, civ cover, cer IN#30182125	\$101.74		Unbilled				
01/31/2022	FST	First Legal Network - additional billing, complaint, summons, civ cover, cer , IN#30185317	\$1,578.50		Unbilled				
04/05/2022	FST	First Legal Network - Filing - NAR-Signed IN# 30195930	\$81.21		Unbilled				
05/02/2022	FST	First Legal Network- Filed Joint CMC Stmt IN 30199329	\$81.21		Unbilled				
11/11/2022	CRT	Court Documents - 11.14.22 stip pulled from docket	\$2.50		Unbilled				
02/07/2023	FST	First Legal Network - Filing - Plfs Opp to MTC Arb IN# 30227367	\$86.11		Unbilled				
03/01/2023	CCL	Court Call 03.01.23 CCL ID#11661350 Motion	\$72.00		Unbilled				
08/07/2023	ARB	Arbitration FEE- Demand for Arb Erick Torres (JAMS Inc.) Echeck	\$50.00		Unbilled				
08/07/2023	ARB	Arbitration FEE- Demand for Arb- Kolby Castillo (JAMS Inc.) ECheck	\$400.00		Unbilled				
02/14/2024	FST	First Legal Network - Filing - Joint Case management Conference IN# 30271388	\$89.65		Unbilled				
02/22/2024	FST	First Legal Network - E-Filing - Notice of Clerks Notice of Continuance IN# 30279435	\$43.10		Unbilled				
04/01/2024	MED	Mediation Services IN#625693 CK#11657	\$5,325.00		Unbilled				
08/14/2024	EXA	Expert Analysis- IN#12548 CK#1121	\$5,670.00		Unbilled				
08/27/2024	LDS	Legal Document Server - E-Filing - Stip and order Received, Joint Case Management Conference statement Filed, IN# 10206575	\$35.20		Unbilled				
09/13/2024	MED	Mediation Services Addiitonal Hour IN#638203 CK#1206	\$495.00		Unbilled				
11/25/2024	LDS	Legal Document Server- Future Estimated Costs	\$167.10		Unbilled				

Matter Billing Detail

JAMES HAWKINS APLC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Total:			\$14,278.32	\$0.00					
Balance:			\$14,278.32						
Total Fees Billed- -----			\$0.00						
Total Fees Unbilled : -----			\$0.00						
Total Fees Received : -----			\$0.00						
Total Soft Cost Billed : -----			\$0.00						
Total Soft Cost Unbilled : -----			\$0.00						
Total Soft Cost Received : -----			\$0.00						
Total Hard Cost Billed : -----			\$0.00						
Total Hard Cost Unbilled : -----			\$14,278.32						
Total Hard Cost Received : -----			\$0.00						
Total Taxes Billed : -----			\$0.00						
Total Taxes Unbilled : -----			\$0.00						
Total Taxes Received : -----			\$0.00						
Total Late Charges Billed : -----			\$0.00						
Total Late Charges Unbilled: -----			\$0.00						
Total Late Charges Received : -----			\$0.00						
Trust Balance: -----			\$0.00						

Matter Billing Detail

JAMES HAWKINS APLC

Date Range: 01/01/1900 to 11/25/2024
Client: BECHTEL - Erick Torres
Matter: BECHTEL - Bechtel Infrastructure and Power Construction Services, Inc.- Erick Torres

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
09/30/2021	FST	First Legal Network - Filing: Complaint and Initial Docs IN: 30175944	\$1,681.64		Unbilled				
12/02/2021	FST	First Legal Network - Filing Branch PDF Same day - NAR, IN#30182125	\$77.94		Unbilled				
01/17/2022	FST	First Legal Network - Filing pdf same day, Joint initial CMC statement, IN#30185317	\$81.21		Unbilled				
01/27/2022	CCL	Court Call - 01.28.22 Complex Case Management Conference - CML	\$94.00		Unbilled				
03/23/2022	FST	First Legal Network - Filing branch pdf same day, Request for dismissal, Dec of CML, IN#30192286	\$103.21		Unbilled				
		Total:	\$2,038.00	\$0.00					
		Balance:	\$2,038.00						

Matter Billing Detail

JAMES HAWKINS APLC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Total Fees Billed-----			\$0.00						
Total Fees Unbilled : -----			\$0.00						
Total Fees Received : -----			\$0.00						
Total Soft Cost Billed : -----			\$0.00						
Total Soft Cost Unbilled : -----			\$0.00						
Total Soft Cost Received : -----			\$0.00						
Total Hard Cost Billed : -----			\$0.00						
Total Hard Cost Unbilled : -----			\$2,038.00						
Total Hard Cost Received : -----			\$0.00						
Total Taxes Billed : -----			\$0.00						
Total Taxes Unbilled : -----			\$0.00						
Total Taxes Received : -----			\$0.00						
Total Late Charges Billed : -----			\$0.00						
Total Late Charges Unbilled: -----			\$0.00						
Total Late Charges Received : -----			\$0.00						
Trust Balance: -----			\$0.00						