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Attorneys for Plaintiff
ENEDINA SANCHEZ DE SEGURA

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

ENEDINA SANCHEZ DE SEGURA, as an
individual and on behalf of all others similarly
situated,

Plaintiff,

vs.

KELCOURT PLASTICS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendant.

Case No. 30-2021-01219806-CU-OE-CXC

*[Assigned for all purposes to the Hon. Randall J.
Sherman, Dept. CX105]*

**SUPPLEMENTAL DECLARATION OF
SCOTT M. LIDMAN IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT, CLASS
REPRESENTATIVE'S SERVICE
AWARD, AND ATTORNEYS' FEES
AND COSTS**

Date: May 17, 2024
Time: 10:00 a.m.
Dept.: CX105

[Complaint Filed: September 3, 2021]
[FAC Filed: November 19, 2021]

1 I, SCOTT M. LIDMAN, declare as follows:

2 1. I am a shareholder and principal of the law firm Lidman Law, APC, and counsel for the
3 named Plaintiff Enedina Sanchez de Segura (“Plaintiff”) and the proposed Settlement Class in the above-
4 captioned matter. I am a member in good standing of the bar of the State of California and am admitted
5 to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify
6 competently to them if called upon to do so.

7 2. I submit this declaration to supplement my previously filed declaration filed on March 7,
8 2024.

9 3. At the time Plaintiff filed her Motion for Preliminary Approval (ROA 149), the estimated
10 class size was 350 based on the documents and information provided by Defendant in connection with the
11 Parties’ mediation and negotiated settlement. However, that was an over estimation. Indeed, on October
12 18, 2023, when Plaintiff filed her supplemental briefing in support of her Motion for Preliminary
13 Approval, Defendant had provided the settlement administrator, Phoenix Settlement Administrators, with
14 the class data. On October 17, 2023, via email Phoenix confirmed that at the time of Preliminary
15 Approval, the class size was 257, the workweeks worked were 29,896 and the payments are as follows:

Payment	Class	PAGA
Average	\$5,054.47	\$231.48
High	\$12,513.78	\$373.11
Low	\$43.45	\$2.83

20 A true and correct copy of the email correspondence is attached hereto as **Exhibit 1**.

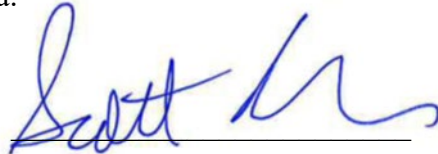
21 4. The attorneys’ fee split is as follows: 40% to Lidman Law, APC and 60% to Haines Law
22 Group, APC.

23 5. A true and correct copy of the billing records maintained by my firm and co-counsel’s firm,
24 Haines Law Group, APC, is attached hereto **Exhibit 2**.

25 6. A true and correct copy of the invoice from Berger Consulting Group, the expert retained
26 for analysis/damages calculations for mediation is attached hereto as **Exhibit 3**.

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

3 Executed on May 1, 2024, at El Segundo, California.

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6 Scott M. Lidman
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EXHIBIT 1

EXHIBIT 1

From: Taylor Mitzner <Taylor@phoenixclassaction.com>

Sent: Tuesday, October 17, 2023 4:17 PM

To: Elizabeth Nguyen <enguyen@lidmanlaw.com>; Jodey Lawrence <jodey@phoenixclassaction.com>; Robert Sheridan <robert.sheridan@nelsonmullins.com>; Chris Eby <chris.eby@nelsonmullins.com>; John Veysey <john.veysey@nelsonmullins.com>

Cc: Scott Lidman <slidman@lidmanlaw.com>; Milan Moore <mmoore@lidmanlaw.com>

Subject: RE: Enedina Sanchez de Segura v. Kelcourt Plastics Inc - Settlement Administrator

Counsel,

Attached are the preliminary calculations based on the data we received from Defendant. We came to the same workweek totals as Defendant – columns F through H (highlighted in purple) indicate Phoenix' workweek calculations.

Below is a breakdown of our findings. Please let me know if you have any questions or need additional information.

- **Total Class Members: 257**
- **Total Class Workweeks: 29,896**

Payment	Class	PAGA
Average	\$5,054.47	\$231.48
High	\$12,513.78	\$373.11
Low	\$43.45	\$2.83

Best regards,
Taylor



Taylor Mitzner

Phoenix Group Coordinator, Case Management & Shareholder

Direct: (949) 910-2153

Email: taylor@phoenixclassaction.com

www.phoenixclassaction.com

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EXHIBIT 2

EXHIBIT 2

Selection Criteria

Slip.Record ID
Slip.Classification Open

Rate Info - identifies rate source and level

Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value
85893 EXP 6/30/2021 WIP Copying cost for June, 2021.	Paul Photocopies Sanchez De Segura, E	8	0.25	2.00
85923 EXP 6/30/2021 WIP Postage for June, 2021.	Paul Postage Sanchez De Segura, E	1	11.72	11.72
87810 EXP 9/3/2021 WIP Submission to LWDA for Initial PAGA Notice LWDA -CM-843462-21	Paul Filing Fee Sanchez De Segura, E	1	75.00	75.00
89432 EXP 9/8/2021 WIP One Legal's fee for filing of Complaint, CCCS , Summons	Paul Filing Fee Sanchez De Segura, E	1	1646.43	1646.43
88881 EXP 9/15/2021 WIP First legal fee for service of Summons, Complaint, etc.	Paul Service Fee Sanchez De Segura, E	1	73.58	73.58
88386 EXP 9/30/2021 WIP Postage for September, 2021	Paul Postage Sanchez De Segura, E	1	22.59	22.59
88438 EXP 9/30/2021 WIP Copying cost for September, 2021.	Paul Photocopies Sanchez De Segura, E	33	0.25	8.25

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Slip Listing

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
90066	EXP	Karla	1	15.70	15.70
10/29/2021		Filing Fee			
WIP		Sanchez De Segura, E			
One Legal Filing Fee for: Notice, Complex					
89767	EXP	Paul	33	0.25	8.25
10/31/2021		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for October, 2021					
90505	EXP	Karla	1	15.70	15.70
11/15/2021		Filing Fee			
WIP		Sanchez De Segura, E			
One Legal Filing Fee for: Proposed Order (Cover Sheet-eFiled)					
90518	EXP	Karla	1	20.59	20.59
11/19/2021		Filing Fee			
WIP		Sanchez De Segura, E			
One Legal Filing Fee for: Stip and Order, Proposed Order					
90519	EXP	Karla	1	16.73	16.73
11/19/2021		Filing Fee			
WIP		Sanchez De Segura, E			
One Legal Filing Fee for: Amended Complaint					
90184	EXP	Gladys	1	5.12	5.12
11/30/2021		Postage			
WIP		Sanchez De Segura, E			
Postage for November, 2021.					
90255	EXP	Gladys	123	0.25	30.75
11/30/2021		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for November, 2021.					
91137	EXP	Gladys	148	0.25	37.00
12/31/2021		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for December, 2021.					
92340	EXP	Karla	1	37.32	37.32
1/28/2022		Filing Fee			
WIP		Sanchez De Segura, E			
One Legal Filing Fee for: Proposed Stip and Order, Stip and Order					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
92190	EXP	Gladys	534	0.25	133.50
1/31/2022		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for January, 2022.					
92389	EXP	Paul	1	33.86	33.86
1/31/2022		Westlaw			
WIP		Sanchez De Segura, E			
Westlaw cost for January, 2022.					
92871	EXP	Karla	1	16.73	16.73
2/4/2022		Filing Fee			
WIP		Sanchez De Segura, E			
One Legal Filing Fee for: Opposition					
92872	EXP	Karla	1	16.73	16.73
2/4/2022		Filing Fee			
WIP		Sanchez De Segura, E			
One Legal Filing Fee for: Proof of Service					
92935	EXP	Karla	1	18.53	18.53
2/10/2022		Filing Fee			
WIP		Sanchez De Segura, E			
One Legal Filing Fee for: Case Management Statement					
92633	EXP	Gladys	275	0.25	68.75
2/28/2022		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for February, 2022.					
92686	EXP	Karla	1	76.12	76.12
2/28/2022		FedEx			
WIP		Sanchez De Segura, E			
FedEx cost for February 2022					
Shipment Date: 02/04					
92743	EXP	Karla	1	2.70	2.70
2/28/2022		Pacer			
WIP		Sanchez De Segura, E			
Pacer expense for February 2022					
92765	EXP	Andy	1	147.95	147.95
2/28/2022		Westlaw			
WIP		Sanchez De Segura, E			
Westlaw cost for February, 2022.					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
92641	EXP	Gladys	1	7.50	7.50
3/4/2022		Document Purchase Fe			
WIP		Sanchez De Segura, E			
Document purchase fee from Orange County Superior Court website					
-Kelcourt's Stip to Continue Order dated 2/17/22					
92717	EXP	Gladys	1	7.50	7.50
3/10/2022		Document Purchase Fe			
WIP		Sanchez De Segura, E			
Document purchase fee from Orange County Super Courts website					
-Kelcourt Stipulation to Continue ISC Order dated 3/9/22					
98164	EXP	Karla	1	7.50	7.50
3/10/2022		Document Purchase Fe			
WIP		Sanchez De Segura, E			
Document Purchase Fee from Orange County Superior Court					
93531	EXP	Gladys	182	0.25	45.50
4/30/2022		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for April, 2022.					
93824	EXP	Andy	1	9.89	9.89
4/30/2022		Westlaw			
WIP		Sanchez De Segura, E			
Westlaw cost for April, 2022.					
94666	EXP	Karla	1	21.36	21.36
5/6/2022		Filing Fee			
WIP		Sanchez De Segura, E			
One Legal Filing Fee for: Joint Statement					
94042	EXP	Gladys	152	0.25	38.00
5/31/2022		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for May, 2022.					
94298	EXP	Andy	1	73.08	73.08
5/31/2022		FedEx			
WIP		Sanchez De Segura, E			
FedEx cost for May 2022					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
94299	EXP	Andy	1	85.06	85.06
5/31/2022		FedEx			
WIP		Sanchez De Segura, E			
FedEx cost for May 2022					
94515	EXP	Gladys	93	0.25	23.25
6/30/2022		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for June, 2022.					
94907	EXP	Gladys	87	0.25	21.75
7/31/2022		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for July, 2022.					
95330	EXP	Gladys	12	0.25	3.00
8/31/2022		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for August, 2022.					
95826	EXP	Imelda	1	22.39	22.39
9/9/2022		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's fee for filing of: joint case management conference statement.					
95884	EXP	Imelda	1	42.98	42.98
9/20/2022		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's fee for filing of: stipulation and protective order - confidential and highly confidential designations, proposed stipulation and protective order - confidential and highly confidential designations					
95587	EXP	Andy	2	0.25	0.50
9/30/2022		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for September, 2022.					
95465	EXP	Paul	1	9000.00	9000.00
10/3/2022		Mediation			
WIP		Sanchez De Segura, E			
Jeff. Ross Mediation fee - Invoice #2294					
12/06/22 mediation					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
96104	EXP	Gladys	37	0.25	9.25
10/31/2022		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for October, 2022.					
96419	EXP	Andy	1	26.35	26.35
11/30/2022		FedEx			
WIP		Sanchez De Segura, E			
FedEx for November, 2022					
96507	EXP	Gladys	962	0.25	240.50
11/30/2022		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for November, 2022.					
96725	EXP	Paul	1	3700.00	3700.00
12/27/2022		Expert			
WIP		Sanchez De Segura, E			
Berger Consulting Group - Expert fee Invoice #7206					
96863	EXP	Andy	1	4.57	4.57
12/31/2022		Postage			
WIP		Sanchez De Segura, E			
Postage for December, 2022.					
96896	EXP	Andy	4	0.25	1.00
12/31/2022		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for December, 2022.					
97015	EXP	Gladys	1031	0.25	257.75
12/31/2022		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for December, 2022.					
97059	EXP	Andy	1	81.52	81.52
12/31/2022		FedEx			
WIP		Sanchez De Segura, E			
FedEx costs for December, 2022					
98109	EXP	Imelda	1	44.47	44.47
1/20/2023		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's fee for filing of: Stipulation and order, Proposed stipulation and order Order #: 19660092					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
98348	EXP	Gladys	190	0.25	47.50
3/1/2023		Photocopies			
WIP		Sanchez De Segura, E			
Postage for February, 2023.					
98396	EXP	Andy	4	0.25	1.00
3/1/2023		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for February, 2023.					
99190	EXP	Imelda	1	44.47	44.47
3/27/2023		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's filing and service fee for: SJoint					
stipulation to continue deadline for filing of plaintiff's					
motion for preliminary approval of class action					
settlement from March 28, 2023.					
Order #: 20083814					
98820	EXP	Gladys	1	8.34	8.34
3/31/2023		Postage			
WIP		Sanchez De Segura, E			
Postage for March, 2023.					
98882	EXP	Andy	2	0.25	0.50
3/31/2023		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for March, 2023.					
98924	EXP	Andy	1	56.15	56.15
3/31/2023		FedEx			
WIP		Sanchez De Segura, E			
FedEx for March, 2023					
98947	EXP	Gladys	396	0.25	99.00
3/31/2023		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for March, 2023.					
99349	EXP	Imelda	1	56.14	56.14
4/25/2023		FedEx			
WIP		Sanchez De Segura, E			
FedEx for April 2023.					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
99448	EXP	Gladys	214	0.25	53.50
4/30/2023		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for April, 2023.					
99919	EXP	Imelda	1	44.47	44.47
5/1/2023		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's filing fee for: Joint stipulation to continue deadline for filing of plaintiff's motion for preliminary approval of class action settlement from April 28, 2023 to May 15, 2023.					
Order #: 20294624					
100036	EXP	Imelda	1	77.42	77.42
5/16/2023		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's filing fee for: Plaintiff's notice of motion and motion for preliminary approval of class action settlement.					
Order #: 20419979					
100037	EXP	Imelda	1	23.88	23.88
5/16/2023		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's filing fee for: Proof of service re: Plaintiff's motion for preliminary approval of class action settlement.					
Order #: 20423753					
100045	EXP	Imelda	1	23.88	23.88
5/19/2023		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's filing fee for: Joint stipulation to vacate status conference or continue status conference to same date as plaintiff's motion for preliminary approval of class action settlement; [Proposed] order					
Order #: 20419164					
100054	EXP	Imelda	1	44.47	44.47
5/25/2023		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's filing fee for: Joint stipulation to vacate status conference or continue status conference to same date as plaintiff's motion for preliminary approval order and [proposed] order.					
Order #: 20431535					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
100055	EXP	Imelda	1	20.59	20.59
5/25/2023		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's filing fee for: Joint stipulation to vacate status conference or continue status conference to same date as plaintiff's motion for preliminary approval order and [proposed] order, Second amended class and representative action complaint, Order granting stipulation to file second amended class and representative action complaint. Order #: 20419165					
99624	EXP	Gladys	250	0.25	62.50
5/31/2023		Photocopies			
WIP		Sanchez De Segura, E			
Copying cost for May, 2023.					
100348	EXP	Imelda	1	23.88	23.88
6/5/2023		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's filing fee for: Amended compalint Order #: 20485479					
101505	EXP	Gladys	1	7.50	7.50
10/10/2023		Document Purchase Fe			
WIP		Sanchez De Segura, E			
Document purchase from Orange Superior Court's website Conf #: 00252G					
-Minute Order on PA dated 8/4/2023					
103407	EXP	Imelda	1	23.88	23.88
10/18/2023		Filing Fee			
WIP		Sanchez De Segura, E			
One Legal's Filing fee for: Supplemental Order #: 21453398					
102360	EXP	Imelda	1	7.50	7.50
11/6/2023		Document Purchase Fe			
WIP		Sanchez De Segura, E			
Document purchase fee for: Minute order					
103957	EXP	Andy	1	23.88	23.88
11/9/2023		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's Filing fee for: Notice of ruling - Complex Order #: 21581501					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
105502	EXP	Andy	1	79.48	79.48
3/8/2024		Filing Fee			
WIP		Sanchez De Segura, E			
One legal's Filing fee for: Motion - Other					
Order #: 22403613					
Grand Total					
			Billable	0.00	17146.20
			Unbillable	0.00	0.00
			Total	0.00	17146.20

EXHIBIT 3

EXHIBIT 3

INVOICE