

KINGSLEY & KINGSLEY, APC

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Attorneys for Plaintiff and all aggrieved employees

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

JEMALYNE BUNO, an individual, on
behalf of the State of California, as a private
attorney general,

PLAINTIFF,

v.

POPULUS GROUP, LLC; and DOES 1 thru
50, inclusive,

DEFENDANTS.

Case No. CIVSB2133954

[Case Assigned for All Purposes to Hon. David
Cohn in Dept. S-26]

**SUPPLEMENTAL DECLARATION OF
LIANE KATZENSTEIN LY IN SUPPORT
OF JOINT MOTION FOR APPROVAL OF
REPRESENTATIVE ACTION
SETTLEMENT**

Date: May 12, 2023

Time: 10:00 a.m.

Dept.: S-26

Complaint Filed: December 21, 2021

Trial Date: None Set

1 **SUPPLEMENTAL DECLARATION OF LIANE KATZENSTEIN LY**

2 I, Liane Katzenstein Ly, declare as follows:

3 1. I am an attorney admitted before all courts of the State of California and a partner in
4 the law firm of Kingsley & Kingsley, APC, counsel of record for Plaintiff in this action. I am
5 completely familiar with the present litigation, including the pleadings, discovery, and filings
6 submitted in this matter. I make this supplemental Declaration from my own personal knowledge,
7 and, if called upon, I could and would competently testify to the following am an attorney licensed
8 to practice before all of the courts of the State of California.

9 2. I make this supplemental declaration in support of Plaintiff's Motion for Approval of
10 Representative Action in the above-captioned case.

11 3. On April 18, 2023, Plaintiff filed her Motion for Approval of Representative Action.
12 However, PAGA Counsel's cost ledger, itemizing the costs that have been incurred in this litigation,
13 was inadvertently not attached as an exhibit to my Declaration. Attached hereto as Exhibit "1" is a
14 true and correct copy of PAGA Counsel's cost ledger.

15 4. As of the date of this filing, Kingsley and Kingsley has incurred \$7,509.64 in costs
16 but will cap the costs at \$7,488.96. As discussed in my initial Declaration in support of the PAGA
17 Motion, this includes all reasonable out-of-pocket expenses advanced and/or incurred by PAGA
18 Counsel in connection with this litigation through the filing of Plaintiff's motion. Specifically,
19 expenses in this matter to date include costs for filing fees, research, mediation, and additional costs
20 for the prosecution of this case evidenced in the attached costs spreadsheet. All of these costs have
21 been incurred in the course of this litigation, and all costs advanced have already been paid by PAGA
22 Counsel, with the exception of the anticipated cost of filing this supplemental declaration and
23 appearing for the hearing.

24 5. All of the requested costs are reasonable in amount and were necessarily incurred by
25 PAGA Counsel in prosecuting this litigation, as itemized in the attached costs ledger.

26 6. Accordingly, the requested reimbursement of the reasonable out-of-pocket expenses
27 advanced and/or incurred is appropriate and justified as part of the overall settlement and the Court
28 should approve the request for reimbursement in the amount of \$7,488.96.

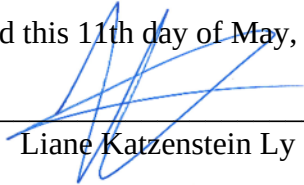
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EXHIBITS

7. Attached hereto as Exhibit “1” is a true and correct copy of Kingsley & Kingsley’s Cost Ledger.

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

This declaration was executed this 11th day of May, 2023, in Los Angeles, California.



Liane Katzenstein Ly

EXHIBIT "1"



Populus Group, LLC adv. Buno, Jemalyne

Jemalyne Buno • •

Historic Cost

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Notes PI's ntc of TSC and case assignment

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Trialworks TaskCode

costs

Date Incurred

2/7/2022

Payee

OnCall

Description

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Research Cost

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Payee
Thomson Reuters

Date Incurred
5/31/2022

Description
billing period of 5/1/22-5/31/22

Filing Fee

\$118.91

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6/15/2022

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6/16/2022

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Court Cost

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Trialworks TaskCode
costs

Payee
Courtcall

Date Incurred
6/27/2022

Notes
HD: 6/24/22

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Created: 8/24/2022 at 11:51 AM

Trialworks TaskCode
costs

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Judicate West

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Date Incurred
8/24/2022

Description
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Date Incurred
9/20/2022

Court Cost

\$2.50

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Date Incurred 11/17/2022		

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Created: 3/1/2023 at 11:08 AM

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Date Incurred 2/28/2023	Description Courtcalls	

Postage Cost

\$5.80

Created: 3/28/2023 at 12:14 PM

Trialworks TaskCode Postage Cost	Date Incurred 3/28/2023
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Filing Fee

\$330.47

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Date Incurred 4/19/2023	Description OLINV#04924556 Populus 4.19.23	

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On May 11, 2023, I served all interested parties in this action the following documents described as: **SUPPLEMENTAL DECLARATION OF LIANE KATZENSTEIN LY IN SUPPORT OF JOINT MOTION FOR APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Scherer Smith & Kenny LLP

Denis S. Kenny

denis@sfcounsel.com

Ryan W. Stahl

rws@sfcounsel.com

John B. Lough, Jr.

john@sfcounsel.com

140 Geary Street, Seventh Floor

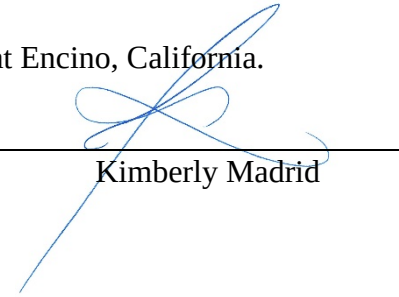
San Francisco, CA 94108

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing (“EF”) System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 11, 2023, at Encino, California.



Kimberly Madrid