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Attorneys for Plaintiff THERESA BENDORF

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

THERESA BENDORF, JAVIER MARIN,
and KRISTY PRATHER, on behalf of
themselves and others similarly situated, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiffs,

v.

SEA WORLD LLC, a Delaware limited
liability company doing business as
SEAWORLD SAN DIEGO or AQUATICA
SAN DIEGO; SEAWORLD PARKS &
ENTERTAINMENT, INC., a Delaware
corporation; and DOES 1 through 25,
inclusive,

Defendants.

Lead Case No. 37-2021-00034922-CU-OE-CTL

Other Included Actions:

Case No. 37-2021-00036521-CU-OE-CTL
Case No. 37-2021-00049040-CU-OE-CTL
Case No. 37-2021-00047859-CU-OE-CTL
Case No. 37-2022-00001083-CU-OE-CTL

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF JONATHAN M. GENISH
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: September 13, 2024
Time: 1:30 p.m.
Department: C-63
Judge: Hon. Katherine A. Bacal

Complaint Filed: August 16, 2021
FAC Filed: October 26, 2023
Trial Date: Not Set

Additional Counsel:

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I, Jonathan M. Genish, declare and state as follows:

1. I am an attorney duly licensed to practice law in all Courts of the State of California. I am a shareholder and the founder of Blackstone Law, APC, attorneys of record for Plaintiff Theresa Bendorf (“Plaintiff Bendorf”). I have personal knowledge of the facts contained herein, and, if called to testify, I could and would competently do so.

Background and Experience

2. I am fully familiar with the legal and factual issues in this case and have specific experience litigating complex wage and hour actions as class actions, including employment cases as set forth above.

3. I received my law degree from Benjamin N. Cardozo School of Law and was admitted to the California State Bar in 2008. During law school, I clerked at the litigation firm Oved & Oved, LLP and was published several times in various small publications. Upon graduation, I was rehired by Freedman & Taitelman, LLP as an associate and remained employed there from September 2008 through August 2015. During my tenure, I managed hundreds (perhaps thousands) of complex litigation cases, ranging from employment, corporate, entertainment, and general business litigation matters, though my primary area of expertise was employment, both single plaintiff and representative actions.

4. On the vast majority of those cases, I was the only or primary attorney managing the case and thus obtained extensive experience. In that capacity, I conducted wage and hour and wrongful termination labor and employment intakes; was the primary contact for all clients; took and defended hundreds (if not thousands) of depositions; propounded and responded to all discovery; prepared and opposed all motions and pleadings, including dispositive and certification motions; strategized on all cases; attended all hearings; attended all mediations; coordinated with class action administrators; prepared and worked with experts; first and second chaired multiple trials and arbitrations; and engaged in all other intricate facets of litigation. During that time, I represented a wide range of clients from sole proprietorships to Fortune 500 companies in state, federal, complex, and appellate courts. Many of the cases I managed were highly publicized, with articles written about them in the Los

1 Angeles Times, Deadline, The Hollywood Reporter, Business Insider, Law360, and others. Super
2 Lawyers has regularly honored me as a Southern California Rising Star since 2012.

3 5. In February 2018, I started the law firm of Blackstone Law, APC, representing
4 plaintiffs in individual and representative employment litigation. The firm has grown exponentially
5 over the past six-plus years, now maintaining twenty highly pedigreed attorneys working on almost
6 exclusively labor and employment class actions, California Labor Code Private Attorney General Act
7 of 2004 (“PAGA”) cases, and individual matters, with roughly 15% of the firm focused on other
8 complex general litigation matters.

9 6. I have considerable experience in handling class and representative action lawsuits
10 throughout my career and have been approved as counsel in a number of cases, including, most
11 recently:

- 12 • *Anthony DiRico v. Seek Capital, LLC*, Los Angeles County Superior Court, Case No.
13 BC698076, a wage and hour class action brought on behalf of a class of hourly-paid
14 employees working in the State of California.
- 15 • *Consumer Protection Group, LLC v. A. D. Sutton & Sons, Inc.*, Los Angeles County
16 Superior Court, Case No. 19STCV29979, a private attorney general action for penalties
17 pursuant to Health and Safety Code section 25249.7.
- 18 • *Consumer Protection Group, LLC v. Shaxon Industries, Inc., et al.*, Los Angeles County
19 Superior Court, Case No. 19STCV30306, a private attorney general action for penalties
20 pursuant to Health and Safety Code section 25249.7.
- 21 • *Consumer Protection Group, LLC v. Home Depot U.S.A., Inc.*, Los Angeles County
22 Superior Court, Case No. 19STCV30445, a private attorney general action for penalties
23 pursuant to Health and Safety Code section 25249.7.
- 24 • *Eric Savoy v. Collector’s Universe, Inc., et al.*, Central District Court of California, Case
25 No.: 8:20-cv-00632-DOC-ADS (recently remanded to Orange County Superior Court,
26 Case No. 30-2020-01130892-CU-RI-CXC), a consumer fraud class action.

27 7. Blackstone Law, APC has been counsel of record on several class action and PAGA
28 actions that have since been resolved, the most recent of which are as follows:

- *David Williams v. Rancho Nicasio, LLC*, Marin County Superior Court, Case No. CIV2203067, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Bobby Birdi v. Lucid USA, Inc.*, Alameda County Superior Court, Case No. 21CV003541, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Alexis Cardoza v. BHFC Operating LLC*, Los Angeles County Superior Court, Case No. 21STCV34040, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Victor De La Cruz v. Northwest Pipe Company*, San Bernardino County Superior Court, Case No. CIVSB2211140, preliminarily approved as class counsel in settlement of wage and hour class and PAGA action.
- *Maria Ayala, et al. v. SDH Services West, LLC*, Kern County Superior Court, Case No. BCV-21-101933, approved as class counsel in final settlement of wage and hour class action.
- *Alfredo Sanchez v. Greenworld, Inc.*, Riverside County Superior Court, Case No. CVRI2105756, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Michael Bravo v. Michels Pacific Energy, Inc.*, Santa Clara County Superior Court, Case No. 22CV403427, preliminarily approved as class counsel in settlement of wage and hour class and PAGA action.
- *Oscar Bryant v. Midwest Construction Services, Inc. dba Trillium*, San Bernardino County Superior Court, Case No. CIVSB2121529, approved as class counsel in final settlement of wage and hour class action.
- *Matthew Savattieri v. AMI Expeditionary Healthcare, LLC, et al.*, Los Angeles County Superior Court, Case No. 21STCV33372, approved as class counsel in final settlement of wage and hour class and PAGA action.

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- *Lexy Barajas, et al. v. H. W. Hunter, Inc.*, Los Angeles County Superior Court, Case No. 22STCV01892, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Alejandro Valdez v. C.H.I. Automart, Inc.*, Los Angeles County Superior Court, Case No. 21STCV40168, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Sheizan Bawa v. Meathead Movers, Inc.*, Orange County Superior Court, Case No. 30-2021-01211895-CU-OE-CXC, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Tanisha Lopez, et al. v. Restorix Health, Inc.*, Los Angeles County Superior Court, Case No. 21STCV33067, approved as class counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Perla Soto, et al. v. Nippon Express U.S.A., Inc.*, Los Angeles County Superior Court, Case No. 21STCV24902, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Angel Garcia, et al. v. J&B Investments, Inc., et al.*, San Bernardino County Superior Court, Case No. CIVSB2208601, approved as class counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Sindy Aviles, et al. v. Freeway Insurance Services America, LLC*, Los Angeles County Superior Court, Case No. 21STCV34864, approved as counsel, in association with other counsel, in settlement of representative wage and hour action pursuant to PAGA.
- *Alexander Gnaedig, et al. v. Favorite Healthcare Staffing, Inc.*, Los Angeles County Superior Court, Case No. 21STCV20904, approved as class counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Richard Evans v. My Paint Stop, LLC, et al.*, Contra Costa County Superior Court, Case No. MSC21-01812, approved as class counsel in final settlement of wage and hour class and PAGA action.

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- *Jose Luis Parada George v. Main Electric Supply Company, LLC, et al.*, Orange County Superior Court, Case No. 30-2021-01220136-CU-OE-CXC, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Samia Salazar Yunis v. Sharif Jewelers*, Sacramento County Superior Court, Case No. 34-2020-00290080, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Daniel Analco v. Felix Chevrolet, LP, et al.*, Los Angeles County Superior Court, Case No. 21STCV36654, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Sasha Aiono v. Benefit Cosmetics*, Los Angeles County Superior Court, Case No. 21STCV33719, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.

8. I am currently the managing partner overseeing roughly 500 labor and employment cases, approximately 80% of which include a wage and hour component. The majority of those cases are wage-and-hour putative class actions or representative PAGA actions seeking relief on behalf of thousands of California employees.

Procedural History of the Bendorf Actions

9. On July 26, 2021, Plaintiff Bendorf provided written notice to the California Labor and Workforce Development Agency by online submission and to Defendants SeaWorld Parks & Entertainment, Inc. and Sea World LLC (together, “Defendants”) by U.S. Certified Mail, pursuant to California Labor Code Section 2699.3, of her intention to commence an action for civil penalties pursuant to PAGA for Defendants’: (1) violation of California Labor Code sections 201, 202, 203, and 227.3 for failure to pay all wages at time of discharge or resignation from employment; (2) violation of California Labor Code section 226(a) for failure to furnish accurate itemized wage statements; (3) violation of California Labor Code section 2810.8 for failure to offer positions in writing to laid-off employees who are qualified for the position within five business days of establishing a position; and (4) violation of California Labor Code sections 226, 432, and 1198.5 for failing to produce employee records for inspection.

1 10. On August 16, 2021, Plaintiff Bendorf filed a Complaint for Enforcement Action Under
2 the Private Attorneys General Act, California Labor Code §§ 2698 Et Seq. in the action entitled
3 *Theresa Bendorf v. Sea World LLC, et al.*, San Diego Superior Court Case No. 37-2021-00034922-
4 CU-OE-CTL (“Action”) against Defendants for civil penalties under PAGA for: (1) failure to timely
5 pay wages upon termination; (2) failure to furnish accurate itemized wage statements; and (3) failure
6 to produce employee records for inspection.

7 11. On August 25, 2021, Plaintiff Bendorf filed a Class Action Complaint in the action
8 entitled *Theresa Bendorf v. Sea World LLC, et al.*, San Diego County Superior Court Case No. 37-
9 2021-00036521-CU-OE-CTL (“*Bendorf* Class Action”) against Defendants for: (1) failure to pay
10 vested vacation wages (Cal. Lab. Code § 227.3; (2) failure to timely pay wages upon termination (Cal.
11 Lab. Code §§ 201, 202, and 203); (3) failure to provide accurate itemized wage statements (Cal. Lab.
12 Code § 226(a)); (4) failure to recall (San Diego Municipal Code §§ 311.0101, et seq.); and (5) unfair
13 competition (Cal. Bus. & Prof. Code §§ 17200, et seq.).

14 12. On October 1, 2021, Plaintiff Bendorf propounded written formal discovery onto
15 Defendants (specifically, Form Interrogatories – General (Set One), Special Interrogatories (Set One),
16 and Requests for Production of Documents (Set One)) in the Action. Thereafter, on November 2, 2021,
17 Defendants served responses to Plaintiff Bendorf’s discovery requests.

18 13. On October 1, 2021, Plaintiff Bendorf propounded written formal discovery onto
19 Defendants (specifically, Form Interrogatories – General (Set One), Special Interrogatories (Set One),
20 and Requests for Production of Documents (Set One)) in the *Bendorf* Class Action. Thereafter, on
21 November 2, 2021, Defendants served responses to Plaintiff Bendorf’s discovery requests, and on July
22 5, 2022, Defendants served supplemental responses to Plaintiff Bendorf’s discovery requests.

23 14. On October 26, 2023, pursuant to the Class Action and PAGA Settlement Agreement
24 (“Settlement Agreement”), Plaintiffs Theresa Bendorf, Kristy Prather, and Javier Marin (collectively,
25 “Plaintiffs”) filed a First Amended Class and Representative Action Complaint (“Operative
26 Complaint”) in the Action, which consolidated the *Bendorf* Class Action, the action entitled *Janeen*
27 *Jones, et al. v. Seaworld Parks & Entertainment, Inc.*, San Diego County Superior Court Case No. 37-
28 2021-00049040-CU-OE-CTL, the action entitled *Javier Marin v. Sea World LLC*, San Diego County

Superior Court Case No. 37-2021-00047859-CU-OE-CTL, and the action entitled *Javier Marin v. Sea World LLC, et al.*, San Diego County Superior Court Case No. 37-2022-00001083-CU-OE-CTL, and stated additional facts, theories, and allegations giving rise to the Plaintiffs' claims. The Operative Complaint alleges causes of action against Defendants for: (1) violation of San Diego Municipal Code §§ 311.010, *et seq.*; (2) wrongful failure to hire in violation of public policy (failure to recall); (3) wrongful failure to hire in violation of public policy (age discrimination); (4) constructive discharge in violation of public policy; (5) wrongful termination in violation of public policy; (6) failure to pay vested vacation wages (Labor Code § 227.3); (7) breach of contract; (8) breach of the implied covenant of good faith and fair dealing; (9) failure to pay minimum wages; (10) failure to pay overtime wages; (11) failure to provide lawful meal periods; (12) failure to authorize and permit rest periods; (13) failure to timely pay wages during employment (Labor Code § 204); (14) failure to timely pay wages upon termination (Labor Code §§ 201, 202, 203); (15) failure to provide accurate itemized wage statements (Labor Code § 226(a)); (16) violation of unfair competition laws (Cal. Bus. & Prof. Code §§ 17200, *et seq.*); and (17) civil penalties under the Private Attorneys' General Act, Labor Code §§ 2698, *et seq.*

15. On June 11, 2024, the Court entered the Order Preliminarily Approving Class Action and PAGA Settlement and Setting Hearing for Final Approval of Settlement ("Preliminary Approval Order"), which conditionally certified the following "Class" or "Class Members" for settlement purposes only:

- a. "Wage and Hour Class" or "Wage and Hour Class Members": all current and former non-exempt employees of Defendants in California during the Wage and Hour Class Covered Period (or if any such person is incompetent, deceased, or unavailable due to military service, the person's legal representative or successor in interest evidenced by reasonable verification). The Wage and Hour Class shall not include any person who submits a valid and timely Request for Exclusion.
- b. "Failure to Recall Class" or "Failure to Recall Class Members": all current and former employees of Defendants in California during the Failure to Recall Class Covered Period who were temporarily or permanently furloughed in connection with the COVID-19 pandemic and who Defendants subsequently failed to recall or reinstate to their prior employment status (or if any such person is incompetent, deceased, or unavailable due to military service, the person's legal representative or successor in interest evidenced by reasonable verification), except those individuals who previously entered into release agreements with Defendants. The Failure to Recall Class shall not include any person who submits a valid and timely Request for Exclusion.

Class Counsel Fees Payment and Class Counsel Litigation Expenses Payment

16. The Settlement Agreement provides for Class Counsel to apply for attorneys' fees in an amount of up to one-third (1/3) of the Gross Settlement Amount (i.e., \$1,166,666.67) and actual litigation costs and expenses in an amount not to exceed Thirty-Five Thousand Dollars and Zero Cents (\$35,000.00), which will be paid out of the Gross Settlement Amount, subject to approval by the Court. Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained. Blackstone Law, APC seeks reimbursement of actual costs and expenses totaling \$4,770.19. Attached hereto as **Exhibit 1** is a true and current list of the litigation costs and expenses incurred by Blackstone Law, APC.

17. The effectiveness of Class Counsel's prosecution of this matter has translated into tangible monetary benefits as follows: (1) Class Members, the State of California, and Aggrieved Employees will obtain monetary recovery over a relatively short period of time, as opposed to waiting additional years for the same, or potentially worse, result; (2) a guaranteed result that compares favorably with other similar class action settlements of this type, given the strengths and weaknesses of the case; and (3) significant savings in Class Counsel's fees and/or costs that would have only increased significantly had the case progress through certification, trial, and/or upon appeal.

18. The attorneys of Blackstone Law, APC who worked on this matter are all experienced in litigating wage and hour matters as follows:

- a. Miriam L. Schimmel is a 28-year litigator who joined Blackstone in June 2022, following ten years of working with two well-known plaintiff-side wage and hour law firms in Los Angeles. Her billable rate is \$1,050, which is well within the prevailing rate for attorneys with her experience in this area of practice in Southern California.
- b. Jill Parker is a former attorney at Blackstone who worked on this matter. She earned her Juris Doctor degree in 2010 from the University of Southern California Gould School of Law. She was admitted to the State Bar of California in December of 2010. She graduated from the University of California, Los Angeles with a Master of Arts degree in 2007, after having graduated from Leland Stanford Junior University with a Bachelor of Arts degree in 2003. Ms. Parker's billable rate was \$695 at the time she

performed the work on this matter.

c. S. Emi Minne is a former attorney at Blackstone who worked on this matter. She earned her undergraduate Bachelor of Arts degree from the University of California at Los Angeles in 2003, and then earned her law degree from the University of California at Los Angeles in 2007. She worked for several plaintiffs' wage and hour law firms before joining Blackstone. Her education and experience support her billable rate of \$495 as reasonable at the time she worked on this matter.

d. Joana Fang is a highly skilled eight-year lawyer who is part of the team at Blackstone that litigated this matter. She is a 2015 graduate of Loyola Law School, and a 2011 graduate of University of California, Berkeley where she was a double major in Legal Studies and Media Studies. Since passing the Bar, Ms. Fang has exclusively represented plaintiffs in wage and hour litigation, as well as catastrophic injury complex litigation. Her hourly rate of \$750 is reasonable based on her education and experience and is in line with the market rate.

e. Alexandra Rose joined Blackstone from a highly reputable employment law firm. She graduated from the University of California, Los Angeles with a Bachelor of Arts degree in 2016 and from New England Law | Boston with a Juris Doctor degree in 2019. She was admitted to the State Bar of California in December of 2019. Her hourly rate of \$695 is reasonable based on her education and experience and is in line with the market rate.

19. The above attorneys of Blackstone Law, APC have been approved at the above hourly rates in the following cases:

a. *David Williams v. Rancho Nicasio, LLC*, Marin County Superior Court, Case No. CIV2203067.

b. *Bobby Birdi v. Lucid USA, Inc.*, Alameda County Superior Court, Case No. 21CV003541.

c. *Maria Ayala, et al. v. SDH Services West, LLC*, Kern County Superior Court, Case No. BCV-21-101933.

d. *Oscar Bryant v. Midwest Construction Services, Inc. dba Trillium*, San Bernardino County Superior Court, Case No. CIVSB2121529.

e. *Matthew Savattieri v. AMI Expeditionary Healthcare, LLC, et al.*, Los Angeles County Superior Court, Case No. 21STCV33372.

20. Blackstone Law, APC has spent approximately 189.80 total hours litigating this matter. To date, our total fees incurred amount to \$162,557. Each attorney who worked on this matter engaged in a multitude of tasks, including communicating with the client, defense counsel, and other Plaintiffs' counsel; investigating the facts and researching applicable legal issues; drafting pleadings, discovery, and briefs; reviewing documents; and facilitating the settlement by reviewing the settlement documents and documents for obtaining settlement approval. A summary of Blackstone Law, APC's lodestar for each attorney who worked on this case is as follows:

<u>Attorney</u>	<u>Position</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Jonathan M. Genish	Managing Partner	18.80	\$1,150	\$21,620
Miriam L. Schimmel	Senior Counsel	65.20	\$1,050	\$68,460
Jill Parker	Senior Counsel	12.40	\$695	\$8,618
S. Emi Minne	Associate	16.60	\$495	\$8,217
Joana Fang	Senior Associate	41.20	\$750	\$30,900
Alexandra Rose	Associate	35.60	\$695	\$24,742

21. We expect to spend an additional 5 hours (\$5,250) in connection with reviewing the Motion, preparing for the final approval hearing, and managing the Settlement through its conclusion, including anticipated communications with defense counsel, the Administrator, other Plaintiffs' counsel, and our client. Based thereon, the total amount of Blackstone Law, APC's fees through closure of this case are estimated to be approximately \$167,807.

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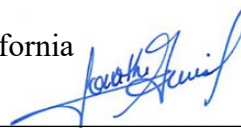
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Class Representative Service Payments

22. As part of the Settlement Agreement, Plaintiffs are requesting reasonable Class Representative Service Payments in the aggregate amount of \$22,500.00, of which \$7,500.00 is requested as a reasonable Class Representative Service Payment to Plaintiff Bendorf. The requested Class Representative Service Payments are eminently reasonable given the time and effort Plaintiffs spent on this matter, and the benefit to the Class Members as a result of Plaintiffs' actions. The Declaration of Plaintiff Bendorf submitted herewith details her work and efforts in bringing and litigating this matter through resolution and supports the requested Class Representative Service Payment.

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

Executed on August 21, 2024, at Beverly Hills, California



Jonathan M. Genish

EXHIBIT 1

Case No: 37-2021-00034922

Date	Type of Expense	Description of Expense	Amount
7/26/2021	Filing	LWDA: PAGA Notice	\$75.00
7/27/2021	Mailing	PAGA Notice to Agent for Service	\$6.96
8/16/2021	Filing	First Legal: PAGA Complaint & Docs	\$553.50
8/18/2021	Service	NationWide Legal: Complaint & Docs to Agent - Defendant #1	\$116.65
8/19/2021	Service	NationWide Legal: Complaint & Docs to Agent - Defendant #2	\$116.65
8/23/2021	Filing	NationWide Legal: Proof of Personal Service	\$33.00
8/27/2021	Filing	First Legal: Notice of Related Case	\$35.00
8/27/2021	Mailing	Mailing Notice of Related Case	\$0.51
8/27/2021	Mailing	Mailing Notice of Related Case	\$0.51
9/20/2021	Research	Download Steward v. SeaWorld Complaint	\$12.20
9/20/2021	Research	Docket Download from Jones Action	\$17.20
9/22/2021	Research	Legal Research - Download Sample Motion to Intervene from SDSC	\$21.00
9/27/2021	Research	Docket Download from Jones Action	\$5.40
10/13/2021	Filing	First Legal: Motion for Leave & Docs (JONES)	\$102.95
10/13/2021	Service	First Legal: Motion for Leave & Docs (JONES) to Dept. C-67	\$94.25
10/14/2021	Filing	First Legal: Motion for Leave & Docs (JONES)	\$102.95
10/15/2021	Filing	First Legal: Motion for Leave & Docs (JONES)	\$141.00
10/20/2021	Mailing	Check to NationWide Legal	\$0.53
11/2/2021	Research	Docket Download from Jones Action	\$59.80
11/2/2021	Filing	First Legal: Ex Parte Application (JONES)	\$101.00
11/2/2021	Service	First Legal: Courtesy Copy of Ex Parte to Dept. C-67 (JONES)	\$47.75
11/5/2021	Filing	First Legal: Plaintiff's Opp to Demurrer & MTS; RFJN; POS	\$35.00
11/15/2021	Research	Docket Download from Jones Action	\$2.00
11/23/2021	Filing	First Legal: Reply to Motion for Leave (JONES)	\$35.00
11/23/2021	Service	First Legal: Bendorf's Reply ISO Motion for Leave (JONES)	\$29.75
11/24/2021	Research	Docket Download from Bendorf Action	\$1.00
11/29/2021	Research	Docket Downloads from SDSC	\$115.60
11/29/2021	Filing	First Legal: Objections to Proposed C.A. Settlement (JONES)	\$35.00
12/10/2021	Research	Docket Downloads from Jones Action	\$10.60
12/15/2021	Research	Docket Downloads from Jones Action	\$1.00
12/17/2021	Research	Docket Downloads from Janeen Jones Action	\$16.60
1/6/2022	Filing	First Legal: CMC Statement	\$36.50
1/24/2022	Filing	First Legal: Notice of Ruling	\$36.50
12/7/2022	Filing	First Legal: Filing of Stipulation to Continue Trial	\$59.55
10/11/2023	Filing	Steno: Notice of Settlement & Request to Vacate Trial Related Dates	\$99.95
10/13/2023	Other	Steno: Courtesy Copy of Notice of Settlement & Request to Vacate Trial Related Dates to Dept. C-73	\$99.00
10/20/2023	Filing	Steno: Notice of Status Conference	\$59.95
10/23/2023	Filing	Steno: Joint Sipulation to file FAC; Proof of Service	\$86.95
10/26/2023	Filing	Steno: First Amended Complaint	\$59.95
12/26/2023	Filing	Steno: Joint Status Conference Statement	\$59.95
5/23/2024	Filing	Steno: Joint Status Conference Statement; Proof of Service	\$59.95

TOTAL: \$2,583.61

State Case No.: 37-2021-00036521
Federal Case No.: 3:21-cv-02061

Date	Type of Expense	Description of Expense	Amount
8/25/2021	Filing	First Legal: Class Action Complaint	\$1,613.50
8/27/2021	Service	First Legal: Personal Service of Class Action Complaint	\$84.38
8/27/2021	Filing	First Legal: Filing of Notice of Related Case	\$35.00
8/30/2021	Filing	First Legal: Filing of Proof of Service	\$35.00
9/22/2021	Filing	First Legal: Filing of Proof of Service	\$35.00
12/22/2021	Service	First Legal: Courtesy Copies of Motion to Remand & Supporting Docs to Judge	\$233.25
1/31/2022	Service	First Legal: Courtesy Copies of Reply to Judge	\$54.00
4/11/2022	Filing	First Legal: Notice of Order Remanding Case to State Court	\$36.50
4/12/2024	Filing	Steno: Joint OSC Statement; Proof of Service	\$59.95

TOTAL: \$2,186.58

SUBTOTAL: \$4,770.19