

1 Larry W. Lee (State Bar No. 228175)
2 Kristen M. Agnew (State Bar No. 247656)
3 Nicholas Rosenthal (State Bar No. 268297)
4 **DIVERSITY LAW GROUP, P.C.**
5 515 S. Figueroa St., Suite 1250
6 Los Angeles, California 90071
7 (213) 488-6555
8 (213) 488-6554 facsimile
9 lwlee@diversitylaw.com
10 kagnew@diversitylaw.com
11 nrosenthal@diversitylaw.com

8 William L. Marder (SBN 170131)
9 bill@polarislawgroup.com
10 **POLARIS LAW GROUP**
11 501 San Benito Street, Suite 200
12 Hollister, CA 95023
13 Telephone: (831) 531-4214
14 Facsimile: (831) 634-0333

12 Attorneys for Plaintiff and the Aggrieved Employees

13
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF SAN JOAQUIN**

16 ANISHA WISE, individually and on behalf
17 of all others similarly situated,

18 Plaintiffs,

19 vs.

20 LA PETITE ACADEMY, INC., a Delaware
21 corporation; and DOES 1 through 50,
22 inclusive,

23 Defendants.

Case No.: STK-CV-UOE-2021-0010461

Honorable Erin Guy Castillo
Department 10B

CLASS ACTION

**DECLARATION OF TAYLOR
MITZNER WITH RESPECT TO
NOTICE AND SETTLEMENT
ADMINISTRATION**

Complaint Filed:	November 9, 2021
FAC Filed:	April 26, 2022
Trial Date	None Set

DECLARATION OF TAYLOR MITZNER

I, Taylor Mitzner, declare as follows:

1. I am a Case Manager at Phoenix Settlement Administrators (“Phoenix”), the Court-appointed Class Action Settlement Administrator for *Wise v. La Petite Academy* (the “Action”). I have personal knowledge of the facts stated herein and, if called upon to testify, I could and would testify competently to such facts.

2. Phoenix was selected by the Parties to provide notice of the Settlement and perform class administration duties in this Action. Pursuant to the Stipulation of Class Action and PAGA Settlement (“Settlement Agreement” or “Settlement”) for this matter, Phoenix was responsible for: (i) preparing, translating, printing, and mailing the *Notice of Class Action Settlement* (“Notice”); (ii) responding to inquiries from Class Members; (iii) determining the validity of letters indicating a request to be excluded from the Class Settlement (“Requests for Exclusion”), written objections to the Class Settlement (“Notice of Objection”), and/or dispute regarding the number of Workweeks submitted by Class Members; (iv) calculating the Net Settlement Amount and the Individual Settlement Shares to Class Members; (v) calculating and issuing the Individual Settlement Payments and distributing them to Settlement Class Members and Individual PAGA Payments to Aggrieved Employees; (vi) issuing the payment to Class Counsel for attorneys’ fees and costs, the Enhancement Payments to both Plaintiffs, and the employer/employee payroll taxes to the appropriate taxing authorities; and (vii) such other tasks as set forth in the Settlement Agreement or as the Parties mutually agree or as the Court orders.

3. On August 2, 2022, Phoenix received a data file from Defense Counsel that contained names, last known mailing addresses, Social Security numbers, and number of Wage Statements earned for each Class Member (“Class List”) from November 9, 2020 to February 25, 2022 (“Class Period”). The final mailing list contained one thousand one hundred forty-seven (1,147) individuals identified as Class Members who earned twenty thousand seven hundred ten (20,710) Wage Statements during the Class Period.

4. On August 4, 2022, Phoenix conducted a National Change of Address (“NCOA”) search in an attempt to update the class list of addresses as accurately as possible. A search of this

database provides updated addresses for any individual who has moved in the previous four (4) years and notified the U.S. Postal Service of their change of address.

5. On August 16, 2022, Phoenix mailed the Notice via U.S. first class mail, in English, to all one thousand one hundred forty-seven (1,147) Class Members on the Class List. A true and correct copy of the mailed Notice is attached hereto as **Exhibit A**.

6. As of the date of this declaration, twenty-one (21) Notices have been returned to Phoenix. None were returned with a forwarding address. Phoenix attempted to locate a current mailing address using TransUnion TLOxp, one of the most comprehensive address databases available for skip tracing. Of the twenty-one (21) Notices that were skip traced, thirteen (13) updated addresses were obtained and the Notice was promptly re-mailed to those Class Members via first class mail.

7. As of the date of this declaration, ten (10) Notices remain undeliverable. Specifically, eight (8) are undeliverable since an updated address could not be obtained via skip trace, and two (2) were returned to Phoenix a second time after being re-mailed.

8. As of the date of this declaration, Phoenix has received one (1) Requests for Exclusion from Class Members. The deadline to request exclusion from the Class Settlement was September 30, 2022.

9. As of the date of this declaration, Phoenix has received zero (0) Notices of Objection from Class Members. The deadline for objecting to the Class Settlement was September 30, 2022.

10. As of the date of this declaration, Phoenix has received zero (0) Workweek disputes from Class Members. The deadline for submitting a dispute was September 30, 2022.

11. There are one thousand one hundred forty-six (1,146) Class Members who did not submit timely and valid Requests for Exclusion and are therefore deemed Settlement Class Members, representing 99.91% of the Class. Settlement Class Members have earned a collective total of twenty thousand six hundred ninety (20,690) Wage Statements during the Class Period.

12. The Net Settlement Amount of \$488,090.99 available to pay Settlement Class Members was determined by subtracting the requested Class Counsel attorneys' fees (\$289,940.00), and costs (\$5,369.01), requested Enhancement Payment to Plaintiff Wise (\$10,000.00), the PAGA

Amount (\$20,000.00), and the Settlement Administration Costs (\$15,000.00) from the Total Settlement Amount (\$828,400.00).

13. Based upon the calculations stipulated in the Settlement, the highest Individual Settlement Share to be paid is approximately \$849.26, the lowest Individual Settlement Share to be paid is approximately \$23.59, while the average Individual Settlement Share to be paid is approximately \$425.91. Settlement Class Members will be issued payment of their Individual Settlement Shares subject to reduction for the employee's share of taxes and withholdings with respect to the wages portion of the Individual Settlement Share (the net payment is their "Individual Settlement Payment").

14. Additionally, \$20,000.00 of the Total Settlement Amount has been allocated toward penalties under the Private Attorneys General Act ("PAGA Amount"), of which 75%, or \$15,000.00, shall be paid to the Labor and Workforce Development Agency ("LWDA"), and 25%, or \$5,000.00, of which shall be paid to all Class Members.

15. Phoenix's costs associated with the administration of this matter are \$15,000.00. This includes all costs incurred to date, as well as estimated costs involved in completing the settlement distribution. A true and correct copy of the invoice from Phoenix is attached hereto as **Exhibit B**.

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

Executed this 13th day of October 2022, at Orange, California.


TAYLOR MITZNER

Exhibit A

Anisha Wise v. La Petite Academy, Inc.
Superior Court of California, County of San Joaquin
(Case No. STK-CV-UOE-2021-0010461)

«PSA_ID»
«Pre_Sort_Tray_ID»
«Pre_Sort_Order»

NOTICE OF CLASS ACTION SETTLEMENT (“NOTICE”)

IF YOU ARE A CURRENT OR FORMER EMPLOYEE OF LA PETITE ACADEMY, INC. (“LPA”) IN THE STATE OF CALIFORNIA AND RECEIVED WAGE STATEMENTS AT ANY TIME DURING THE PERIOD OF NOVEMBER 9, 2020, THROUGH FEBRUARY 25, 2022, YOU MAY BE ABLE TO COLLECT MONEY FROM A CLASS ACTION SETTLEMENT.

The San Joaquin County Superior Court (“Court”) authorized this Notice to be sent by (“Settlement Administrator”). This is not an advertisement. This is not a solicitation from a lawyer.

LPA CANNOT AND WILL NOT RETALIATE AGAINST YOU IN ANY WAY FOR PARTICIPATING IN THIS SETTLEMENT.

ATTN: «First_Name» «Last_Name»
«Address_1» «City»
«City» «State» «ZIP_Code»

**YOU ARE ESTIMATED TO RECEIVE
APPROXIMATELY \$«Est_Set_Amt»
THROUGH THIS CLASS ACTION
SETTLEMENT**

- Anisha Wise (“Named Plaintiff”) has sued La Petite Academy, Inc. (“Defendant”) on behalf of herself and all other similarly situated employees.
- The parties to the lawsuit have reached a tentative settlement, and the Court has preliminarily approved it.
- The settlement resolves the lawsuit.
- Your legal rights are affected whether you act or do not act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

You Can DO NOTHING	You will receive a payment from the settlement. If you do nothing, you continue your participation in this lawsuit, and you will be impacted by the outcome of this case. You will receive a settlement payment; however, you will lose any rights to sue Defendant separately for the same legal claims made in the lawsuit. The estimated amount of your settlement payment is shown above. To receive your settlement payment, all you need to do is keep the Settlement Administrator informed of your current mailing address. Once the Court grants final approval of the settlement, the Settlement Administrator will mail your check to the address on file for you.
You Can ASK TO BE EXCLUDED FROM THE SETTLEMENT (Deadline: September 30, 2022)	If you ask to be excluded from the settlement, you will get no payment from the class settlement, but you will keep any rights to sue Defendant separately for the same legal claims made in this lawsuit. Important: You cannot ask to be excluded <u>and</u> still get a class settlement payment.
You Can OBJECT TO THE SETTLEMENT (Deadline: September 30, 2022)	If you do not like the settlement, you can send a written objection to the Settlement Administrator by the deadline. If your objection is overruled, you will still be bound by the terms of the settlement and will receive a settlement payment. Important: If you object to the settlement, you cannot also ask to be excluded.

**THESE RIGHTS AND OPTIONS—AND THE DEADLINES TO EXERCISE THEM—
ARE EXPLAINED IN THIS NOTICE.**

The Court is in charge of this lawsuit and still has to decide whether to approve the settlement. Payments will be made if the Court approves the settlement and after appeals, if any, are resolved. **Please be patient.**

1. Why Should You Read This Notice?

You should read this Notice because you may be entitled to money from a class action settlement.

2. What is This Lawsuit About?

In the lawsuit, the Named Plaintiff claimed that Defendant failed to provide accurate itemized wage statements to Class Members, in violation of California Labor Code section 226. Specifically, Plaintiff alleges that the wage statements did not identify the correct rates of pay and total hours worked when hourly wages were paid. Defendant denies the allegations in the lawsuit and denies it has engaged in any wrongdoing. Defendant asserts that it complied with all legal requirements, but is resolving this action in order to avoid the costs of further legal proceedings.

3. Why is This a Class Action?

This lawsuit is a class action. In a class action, one or more persons, called a class representative (in this case, Anisha Wise), sue on behalf of people who allegedly have similar claims. All these people are a class or class members. One case resolves the issues for all class members, except for those who exclude themselves from the class. The San Joaquin County Superior Court is in charge of the case. The lawsuit is known as *Anisha Wise v. La Petite Academy, Inc.*, Case No. STK-CV-UOE-2021-0010461.

4. Why is There a Settlement?

The Court did not decide in favor of Named Plaintiff or Defendant. Named Plaintiff thinks she could have won at trial. Defendant thinks that it would have won at trial. But there was no trial. Instead, both parties agreed to a settlement. That way, they avoid the cost of litigation, and the individuals potentially affected will get compensation. The class representative and the attorneys think the settlement is best for class members.

5. How Do I Know If I Am Part of the Settlement?

The Court has decided that any current and former non-exempt employee of La Petite Academy, Inc. in the State of California, who received a wage statement at any time from November 9, 2020, through February 25, 2022 (the “Class Period”) is a class member.

6. What Does the Settlement Provide?

The proposed settlement provides for a payment by Defendant of \$828,400.00 to fully and finally resolve all claims in the lawsuit (referred to as the “Gross Settlement Amount”). The total amount to be distributed to class members who can be located, and who do not exclude themselves from the settlement, will be the value of the Gross Settlement Amount after deducting the following (the “Net Settlement Amount”): (a) settlement administration costs not to exceed \$15,000.00; (b) class representative service award to Named Plaintiff not to exceed \$10,000.00 for her work and efforts in prosecuting this case, and for undertaking the risks of costs (in the event the outcome of this lawsuit was not favorable); (c) Class Counsel’s attorneys’ fees not to exceed \$289,940.00; (d) Class Counsel’s actual litigation costs and expenses as supported by declaration not to exceed \$10,000.00; and (e) payment of PAGA penalties in the amount of \$15,000 to the California Labor & Workforce Development Agency (“LWDA”). **Class Counsel’s attorneys’ fees and costs and Named Plaintiff’s class representative service award remain subject to Court approval.**

No portion of the Net Settlement Amount will be returned to Defendant under any circumstances.

7. How Much Will My Payment Be?

Your estimated share of the settlement is shown above and is based on the number of wage statements you received from Defendant during the period of November 9, 2020, through February 25, 2022, as compared to the total number of wage statements received by all class members in that same period. Based upon Defendant's records, the number of applicable wage statements you received is determined to be «Total_Wage_Statements». If this information appears correct, you do not need to do anything further to receive your settlement payment. If you disagree with the number of wage statements with payment for wages, see below (Question 9).

8. How Do I Get a Payment?

To qualify for payment, you need not do anything other than keep the Settlement Administrator informed of your current mailing address. The Settlement Administrator will mail you a check within about forty-five days after the Court enters a judgment based on this settlement, but possibly later depending on whether there is any appeal of the judgment entered by the Court.

9. What If I Believe the Information is Inaccurate?

If you believe the number of wage statements you received during the period of November 9, 2020, through February 25, 2022 is inaccurate, you may dispute it by sending a letter to Phoenix Settlement Administrators, P.O. Box 7208, Orange, CA 92863, no later than September 30, 2022. Be sure to include your name, address, telephone number, last four digits of your Social Security Number, and a statement as to what and why you are disputing. Also attach a copy of any documentation you want to include to support your dispute.

10. What Am I Giving Up to Get a Settlement Payment?

Unless you request to be excluded from the settlement, you remain a part of the settlement class, and that means you cannot sue, continue to sue, or be part of any other lawsuit against Defendant for any legal claims that are based on the facts alleged by Named Plaintiff in the lawsuit, or any claims that could have been brought under the facts and allegations made in the lawsuit. Specifically, you will be giving up or "releasing" the claims described below:

all claims, including penalties, costs, and attorneys' fees related thereto, that could have been brought under the facts and allegations made in the operative Complaint, including claims for violation of Labor Code § 226 that accrued from November 9, 2020, through February 25, 2022; and

all claims for penalties under the California Private Attorneys General Act of 2004, Labor Code § 2698, *et seq.*, including costs and attorneys' fees related thereto, predicated on the violation of Labor Code § 226, based on the facts as alleged in the operative Complaint that accrued from November 9, 2020, through February 25, 2022.

11. How Do I Exclude Myself from the Settlement?

To exclude yourself from the settlement (also referred to as "opt-out"), you must mail a letter to the Settlement Administrator saying that you want to be excluded from the *Anisha Wise v. La Petite Academy, Inc.* settlement.

Be sure to include your name, address, telephone number, last four digits of your Social Security Number, and your signature. You must mail your exclusion letter postmarked no later than September 30, 2022, to the Settlement Administrator at Phoenix Settlement Administrators, P.O. Box 7208, Orange, CA 92863.

If you submit a timely and valid "opt-out" request, you will no longer be a member of the class and you will not receive any money from the class portion of the settlement, or be able to object to the settlement, but you will not be legally bound by anything that happens regarding the class action portion of this lawsuit. You will keep any rights to sue (or continue to sue) Defendant in the future for the same legal claims made in this lawsuit, at your own expense, except the PAGA claims. You will continue to be bound by the release of PAGA claims even if you opt out.

12. If I Don't Exclude Myself, Can I Sue Defendant or Get Money from the Settlement?

If you do not exclude yourself from the settlement, you cannot sue Defendant for any of the claims that this settlement resolves. If you have a pending lawsuit against Defendant, speak to your lawyer in that case immediately. You may have to exclude yourself from this case to continue on with your own lawsuit. Remember, the exclusion deadline is September 30, 2022.

If you exclude yourself from the Settlement, you will not receive any money from the settlement of the class action claims in this matter.

13. How Do I Tell the Court that I Don't Believe that the Settlement is Fair?

If you are a class member and you do not exclude yourself from the settlement, you can object to the settlement if you believe that the settlement is unfair or inadequate. You can give reasons why you think the Court should not approve the settlement. If you object and follow the procedures set out in this section, your objection will be considered.

If you decide to object to the proposed settlement, you may do so in writing. All objections must be signed by you and must include: (1) your full name, address, telephone number, and your signature; (2) a written statement of the basis for your objection; and (3) any copies of papers, briefs, or documents upon which the objection is based. You must mail your objection postmarked no later than September 30, 2022, to the Settlement Administrator at Phoenix Settlement Administrators, P.O. Box 7208, Orange, CA 92863, as well as to the Court at the following address: Clerk of the Court, Superior Court of California, County of San Joaquin, 180 E. Weber Ave., Stockton, CA 95202. You may also appear at the final approval hearing for the settlement (see section 17 below for details as to when this hearing will take place), either in person or through an attorney at your own expense.

Alternatively, you may appear at the final approval hearing for the settlement and present your objection to the Court orally, even without submitting a written objection. If you plan to appear you must send a notice to appear in advance of your appearance to Clerk of the Court, Superior Court of California, County of San Joaquin, 180 E. Weber Ave., Stockton, CA 95202.

14. What Is the Difference Between Objecting and Excluding?

Objecting is simply telling the Court that you don't like something about the settlement. You can object only if you stay in the class. Excluding yourself, on the other hand, is telling the Court that you don't want to be part of the class. If you exclude yourself, you have no basis to object because the case no longer affects you. However, if you file an objection, you will still receive settlement benefits under the settlement if it is approved by the Court.

15. Do I Have a Lawyer in this Case?

The Court decided that the law firms of Diversity Law Group and Polaris Law Group, both of which represent the Named Plaintiff, are also qualified to represent you and all class members. You will not be charged for these lawyers. These law firms are referred to as "Class Counsel." If you want to be represented by your own lawyer, you may hire one at your own expense.

16. How Will the Attorneys for the Class and the Class Representative be Paid?

The attorneys for the Named Plaintiff and the class will be paid from the Gross Settlement Amount. Class Counsel will ask for up to \$289,940.00 in attorneys' fees and for actual litigation costs incurred up to a maximum of \$10,000.00, the actual amount of which will be determined by the Court at the final approval hearing (see section 17 below for details as to when this hearing will take place). Class members (like you) do not have to pay the fees and costs of Class Counsel. **If you elect, however, to hire your own lawyer, you have to make your own arrangements to compensate your lawyer.**

If approved by the Court, a service payment for the Named Plaintiff of an amount up to \$10,000.00 will be paid from the Gross Settlement Amount for her work and efforts in prosecuting this case, and for undertaking the risks of costs (in the event the outcome of this lawsuit was not favorable).

17. Notice of Hearing on Final Approval and Objections to Class Action Settlement.

The Court has preliminarily approved the settlement and will hold a final approval hearing to decide whether to give final approval to the settlement. This hearing will be held before the Honorable Erin Guy Castillo on November 14, 2022, at 9:00 a.m., in Department 10B of the Superior Court of California for the County of San Joaquin, 180 E. Weber Ave., Stockton, CA 95202, to determine whether the proposed settlement is fair, reasonable, and adequate, and whether it should be finally approved by the Court. If there are objections, the Court will consider them. After the hearing, the Court will decide whether to approve the settlement. We do not know how long this decision will take. The final approval hearing may be continued without further notice. The Court may adjourn or continue the hearing from time to time, without further notification, as the Court may direct.

Once final approval is granted by the Court, the Court will enter judgment against Defendant, and all class members who have not requested exclusion will be deemed to have waived the Released Claims set forth above.

18. How Do I Get More Information?

This Notice summarizes the proposed settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement by contacting Class Counsel or the Settlement Administrator: Phoenix Settlement Administrators, P.O. Box 7208, Orange, CA 92863, Telephone: (800) 523-5773

19. What is the Contact Information for the Court and Class Counsel?

The address for the Court and Class Counsel are as follows:

COURT	CLASS COUNSEL
Clerk of Court Superior Court of California, County of San Joaquin 180 E. Weber Ave, Stockton, CA 95202	DIVERSITY LAW GROUP Larry W. Lee Kristen M. Agnew Nicholas Rosenthal 515 S. Figueroa Street, Suite 1250 Los Angeles, CA 90071 Telephone: (213) 488-6555 Facsimile: (213) 488-6554 POLARIS LAW GROUP William L. Marder 501 San Benito Street, Suite 200 Hollister, CA 95023 Telephone: (831) 531-4214 Facsimile: (831) 634-0333

WHAT IF I HAVE QUESTIONS?

If you have any questions about the settlement, you may contact the Settlement Administrator:

Anisha Wise v. La Petite Academy, Inc.
c/o Phoenix Settlement Administrators
P.O. Box 7208
Orange, CA 92863
Telephone: (800) 523-5773
Facsimile: (949) 209-2503
Email: notice@phoenixclassaction.com

PLEASE DO NOT TELEPHONE THE COURT OR THE OFFICE OF THE COURT CLERK FOR INFORMATION ABOUT THIS SETTLEMENT OR THE SETTLEMENT PROCESS.

Exhibit B



PHOENIX

CLASS ACTION ADMINISTRATION SOLUTIONS

CASE ASSUMPTIONS

Class Members	1,147
Opt Out Rate	1%
Opt Outs Received	1
Total Class Claimants	1,146
Subtotal Admin Only	\$15,060.69

INVOICE

\$15,000.00

October 13, 2022

Case: WISE V. LA PETITE ACADEMY

Case & Database Setup / Toll Free Setup & Call Center / NCOA (USPS)

Administrative Tasks:	Rate	Hours/Units	Line Item Estimate
Programming Manager	\$125.00	3	\$375.00
Programming Database & Setup	\$125.00	3	\$375.00
Toll Free Setup*	\$144.24	1	\$144.24
Call Center & Long Distance	\$2.00	16	\$32.00
NCOA (USPS)	\$300.00	1	\$300.00
Total			\$1,226.24

* Up to 120 days after disbursement

Data Merger & Scrub / Notice Packet, Opt-Out Form & Postage / Spanish Translation / Reporting

Project Action	Rate	Hours/Units	Line Item Estimate
Notice Packet Formatting	\$125.00	3	\$375.00
Data Merge & Duplication Scrub	\$0.25	1,147	\$286.75
Notice Packet & Opt-Out Form	\$1.25	1,147	\$1,433.75
Estimated Postage (up to 2 oz.)*	\$0.71	1,147	\$814.37
Static Website	\$200.00	1	\$200.00
Total			\$3,109.87

Skip Tracing & Remailing Notice Packets / Tracking & Programming Undeliverables

Project Action:	Rate	Hours/Units	Line Item Estimate
Case Associate	\$55.00	3	\$165.00
Skip Tracing Undeliverables	\$2.50	229	\$573.50
Remail Notice Packets	\$1.25	229	\$286.75
Estimated Postage	\$0.71	229	\$162.87
Programming Undeliverables	\$50.00	2	\$100.00
Total			\$1,288.12

Database Programming / Processing Opt-Outs, Deficiencies or Disputes			
Project Action:	Rate	Hours/Units	Line Item Estimate
Programming Claims Database	\$125.00	3	\$375.00
Non Opt-Out Processing	\$125.00	2	\$250.00
Case Associate	\$55.00	2	\$110.00
Opt-Outs/Deficiency/Dispute Letters	\$10.00	3	\$30.00
Case Manager	\$85.00	4	\$340.00
		Total	\$1,105.00

Calculation & Disbursement Programming/ Create & Manage QSF/ Mail Checks			
Project Action:	Rate	Hours/Units	Line Item Estimate
Programming Calculations	\$125.00	4	\$500.00
Disbursement Review	\$125.00	4	\$500.00
Programming Manager	\$95.00	3	\$285.00
QSF Bank Account & EIN	\$100.00	2	\$200.00
Check Run Setup & Printing	\$125.00	3	\$375.00
Mail Class Checks *	\$1.50	1,146	\$1,719.00
Estimated Postage	\$0.56	1,146	\$641.76
		Total	\$4,220.76

* Checks are printed on 8.5 x 11 in. sheets with W2/1099 Tax Filing

Tax Reporting & Reconciliation / Re-Issuance of Checks / Conclusion Reports and Declarations			
Project Action:	Rate	Hours/Units	Line Item Estimate
Case Supervisor	\$125.00	4	\$500.00
Remail Undeliverable Checks (Postage Included)	\$1.50	344	\$515.70
Case Associate	\$50.00	3	\$150.00
Reconcile Uncashed Checks	\$75.00	4	\$300.00
Conclusion Reports	\$100.00	3	\$300.00
Case Manager Conclusion	\$85.00	3	\$255.00
Final Reporting & Declarations	\$120.00	2	\$240.00
IRS & QSF Annual Tax Reporting * (1 State Tax Reporting Included)	\$1,500.00	1	\$1,500.00
Check to Cy-Pres	\$150.00	1	Included
Uncashed Checks to the State of California Controllers Office Estimated 9 Total Class Members	\$350.00	1	\$350.00
Total			\$4,110.70

* All applicable California State & Federal taxes, which include SUI, ETT, and SDI, and FUTA filings. Additional taxes are Defendant's responsibility.

Estimate Total: \$15,060.69

