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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF YOLO

Coordination Proceeding
Special Title (Rule 3.550)

HUMANO WAGE AND HOUR CASES

Included actions:

Hines v. Humano LLC

Emmens v. Humano LLC

Thurman v. Humano LLC

JUDICIAL COUNCIL COORDINATION
PROCEEDING
No. 5240

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO
No. 34-2022-00313411

SUPERIOR COURT OF CALIFORNIA
COUNTY OF YOLO
No. CV2021-2225

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
No. CIVSB2227784

*[Assigned for all purposes to Hon. Daniel M.
Wolk, Dept. 8]*

**DECLARATION OF SEAN M.
BLAKELY IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: December 20, 2024
Time: 10:30 a.m.
Dept.: 8

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Attorneys for Plaintiff Doris J Thurman

1 I, SEAN M. BLAKELY, declare as follows:

2 1. I am a Partner at Haines Law Group, APC, and co-counsel for the named Plaintiffs
3 Michael Emmens, Jermaine Hines, and Doris J. Thurman (“Plaintiffs”) and the proposed
4 Settlement Class in the above-captioned matter. I am a member in good standing of the bar of the
5 State of California and am admitted to practice in this Court. I have personal knowledge of the
6 facts stated in this declaration and could testify competently to them if called upon to do so.

7 2. I am a 2008 graduate of Southwestern Law School. I was admitted to the California
8 State Bar in September 2009. From December 2010 to September 2011, I worked as a Law Clerk
9 for Rose, Klein & Marias, a civil litigation firm in Long Beach, California. At Rose, Klein &
10 Marias I assisted trial attorneys in employment and personal injury cases. From September 2011
11 to May 2016, I worked as an associate at the employment law firm of Mahoney Law Group, APC
12 in Long Beach, California. The vast majority of my work at Mahoney Law Group, APC focused
13 on representing employees in wage and hour class actions. My work at Mahoney Law Group,
14 APC also included representing employees in individual claims for wrongful termination,
15 harassment, discrimination, and retaliation. Although non-exhaustive, the types of work I
16 performed at Mahoney Law Group, APC included: conducting client intakes; performing pre-
17 filing research and analysis; drafting complaints; attending court hearings; corresponding with
18 opposing counsel; drafting and responding to written discovery; preparing for and taking and
19 defending depositions; analyzing payroll and timekeeping records and employee handbooks;
20 opposing motions for summary judgment, as well as a variety of other motions such as motions
21 for remand, demurrers and motions to dismiss, motions to strike, motions to compel, motions to
22 quash, and motions for class certification; drafting mediation briefs; attending mediations;
23 drafting long-form settlement agreements; drafting motions for preliminary and final settlement
24 approval; and overseeing the notice process.

25 3. Since November 2016, I have worked at my current firm, Haines Law Group,
26 APC, where, in 2020, I became a Partner. I am currently responsible for managing over fifty (50)
27 active wage and hour class and representative actions in both state and federal court.

28 4. The following is a non-exhaustive list of wage and hour class actions in which I

1 have been appointed as class counsel and/or played a significant role in prosecuting the litigation,
2 and which have received final approval: *Santimateo v. Sun Healthcare Group, Inc., et al*, Case
3 No. BC471884, California Superior Court, Los Angeles County, Judge Jane L. Johnson presiding
4 (granted final approval of settlement on behalf of employees at rehabilitation facility involving
5 claims for unpaid wages and meal and rest period violations, and other claims, in which I was
6 approved at an hourly rate of \$325 for work performed in 2012-2013); *Teyuca v. Pacific Alliance*
7 *Medical Center, Inc.*, California Superior Court, Los Angeles County, Judge William F.
8 Highberger presiding (granting final approval of settlement on behalf of healthcare workers for
9 unpaid wages, meal and rest period violations, and other claims, in which I was approved at an
10 hourly rate of \$325 for work performed in 2012-2013); *Arteaga v. Command Center Security,*
11 *Inc.*, Case No. BC480496, California Superior Court, Los Angeles County, Judge John Shepard
12 Wiley, Jr. presiding (granting final approval of settlement on behalf of security guards involving
13 claims for unpaid overtime, meal and rest period violations, and other claims, in which I was
14 approved at an hourly rate of \$425 for work performed in 2012-2015); *Casadine v. Maxim*
15 *Healthcare Services, Inc.*, Case No. CV 12-10078-DMG (CWx), United States District Court,
16 Central District of California, Judge Dolly M. Gee presiding (granting final approval of settlement
17 on behalf of home health care employees involving claims for unpaid wages and other claims, in
18 which I was approved at an hourly rate of \$425 for work performed in 2012-2015); *Guzman v.*
19 *Andrew Lauren Interiors, Inc., et al.*, Case No. BC567757, California Superior Court, Los
20 Angeles County, Judge Elihu M. Berle presiding (granting final approval of settlement on behalf
21 of construction workers involving claims for unpaid wages, meal and rest period violation, and
22 other claims, in which I was approved at an hourly rate of \$425 for work performed in 2014-
23 2016); *Booker v. The Goodyear Tire and Rubber Company*, Case No. BC498399, California
24 Superior Court, Los Angeles County, Judge Amy Hogue presiding (granting final approval of
25 settlement on behalf of tire mechanics involving claims for unpaid wages, meal and rest period
26 violations, and other claims, in which I was approved at an hourly rate of \$425 for work performed
27 in 2013-2015); *Nunez v. CompuCom Systems, Inc.*, Case No. BC618385, California Superior
28 Court, Los Angeles County, Judge John Shepard Wiley, Jr. presiding (granting final approval of

1 settlement on behalf of IT support workers for overtime, meal and period, reimbursement, and
2 related violations, approved at hourly rate of \$475 for work performed in 2016 and 2017); *Galvan*
3 *v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC, California
4 Superior Court, Orange County, Judge William D. Claster presiding (granting final approval of
5 settlement on behalf of non-exempt employees of a chemical manufacturing company involving
6 claims for unpaid overtime and waiting time penalties); *Razon v. TTM Technologies, Inc., et al.*,
7 Case No. 37-2016-00038326-CU-OE-CTL, California Superior Court, San Diego County, Judge
8 Gregory W. Pollack presiding (granting final approval of settlement involving claims for unpaid
9 overtime wages, wage statement violations, and meal period violations); *Blank v. Coty, Inc., et*
10 *al.*, Case No. BC624850, California Superior Court, Los Angeles County, Judge Williams F.
11 Highberger presiding (granting final approval of settlement involving claims for wage statement
12 violations, meal period violations, and other claims); *Morales v. Caremeridian, LLC, et al.*, Case
13 No. BC593191, California Superior Court, Los Angeles County, Judge William F. Highberger
14 presiding (granting final approval of settlement on behalf of direct support professionals
15 involving claims for unpaid wages, meal and rest period violations, wage statement violations,
16 and other claims); *Aguilar v. Act Fulfillment, Inc.*, Case No. RIC1616643, California Superior
17 Court, Riverside County, Judge Sharon J. Waters presiding (granting final approval of settlement
18 on behalf of non-exempt factory workers involving claims for meal period violations); *Sandoval*
19 *v. AMCOR Flexibles Inc.*, Case No. BC617499, California Superior Court, Los Angeles County,
20 Judge Kenneth R. Freeman presiding (granting final approval of settlement on behalf of
21 manufacturing employees involving claims for unpaid wages, meal period violations, rest period
22 violations, and waiting time penalties); *Le v. GBW Railcar Services, L.L.C.*, Case No.
23 RIC1612209, California Superior Court, Riverside County, Judge Sharon J. Waters presiding
24 (granting final approval of settlement on behalf of non-exempt employees of a freight railcar
25 manufacturer involving claims for unpaid overtime and minimum wages, meal period violations,
26 and rest period violations); *Silva v. ADJ Products, LLC*, Case No. BC618581, California Superior
27 Court, Los Angeles County, Judge William F. Highberger presiding (granting final approval of
28 settlement involving claims for unpaid overtime and minimum wages, rest period violations,

wage statement violations, and waiting time penalties); *Lira v. Discus Dental, LLC, et al.*, Case No. CIVDS1620402, California Superior Court, San Bernardino County, Judge David Cohn presiding (granting final approval of settlement on behalf of non-exempt manufacturing employees involving claims for unpaid minimum and overtime wages, meal and rest period violations, and other claims); *Gonzales v. PathPoint*, Case No. BC657147, California Superior Court, Los Angeles County, Judge Carolyn B. Kuhl presiding (granting final approval of settlement on behalf of non-exempt direct support professionals involving claims for meal and rest period violations and other claims); *Duran v. PRADA USA CORP.*, Case No. BC644319, California Superior Court, Los Angeles County, Judge Maren E. Nelson presiding (granting final approval of settlement on behalf of non-exempt commissioned salespersons involving claims for unpaid overtime wages, meal and rest period violations, failure to reimburse for necessary expenditures, and other claims); *Banegas v. UPM, Inc.*, Case No. BC644438, California Superior Court, Los Angeles County, Judge Carolyn B. Kuhl presiding (granting final approval of settlement on behalf of non-exempt manufacturing employees involving claims for unpaid wages, meal and rest period violations, and other claims); *Palafox v. Pacific Line Clean-Up, Inc.*, Case No. 30-2017-00921632-CU-OE-CXC, California Superior Court, Orange County, Judge William D. Claster presiding (granting final approval of settlement on behalf of non-exempt employees involving claims for unpaid overtime wages, meal and rest period violations, and other claims); *Janet Arroyo v. AST Sportswear, Inc., dba Bayside Apparel Manufacturing, Inc.*, Case No. 30-2017-00909663-CU-OE-CXC, California Superior Court, Orange County, Judge Glenda Sanders presiding (granting final approval of settlement on behalf of non-exempt garment employees involving claims for unpaid minimum wages, meal and rest period violations, and other claims); *Carlos Garcia v. Fabrica International, Inc.*, Case No. 30-2017-00949461-CU-OE-CXC, California Superior Court, Orange County, Judge William D. Claster presiding (granting final approval of settlement on behalf of non-exempt manufacturing employees involving claims for unpaid minimum and overtime wages, meal and rest period violations, and statutory penalties); *Jonathan Leon v. Piercey West, Inc.*, Case No. BC656874, California Superior Court, Los Angeles County, Judge Amy D. Hogue presiding (granting final approval of settlement on behalf

1 of non-exempt commissioned salespersons and other employees involving claims for unpaid
2 wages, meal and rest period violations, unreimbursed business expenses, and other claims); and
3 *Matthew Tovar, et al. v. Rentokil North America, Inc.*, Case No. BC676386, California Superior
4 Court, Los Angeles County, Judge Daniel J. Buckley presiding (granting final approval of
5 settlement on behalf of non-exempt employees involving claims for unpaid overtime, meal and
6 rest break violations, and other claims); *Seungmin Samantha Lee v. Infor (US) Inc.*, Case No.
7 CGC-18-566393, California Superior Court, San Francisco County, Judge Ethan P. Schulman
8 presiding (granting final approval of settlement on behalf of sales development representatives
9 involving claims for unpaid overtime, meal and rest period violations, and penalty claims); *Tracy*
10 *Aguilar, et al. v. Aero Port Services, Inc.*, Case No. BC659234, California Superior Court, Los
11 Angeles County, Judge Carolyn B. Kuhl presiding (granting final approval of settlement on behalf
12 of non-exempt employees involving claims for meal and rest period violations, and other claims);
13 *Carlos Perez, et al. v. Moss Bros. Auto Group, Inc., et al.*, Case No. RIC1709905, California
14 Superior Court, Riverside County, Judge Sunshine S. Sykes presiding (granting final approval of
15 settlement on behalf of non-exempt commissioned salespersons involving claims for unpaid
16 wages, meal and rest period violations, other claims); and *Julio Alfaro v. Orange Automotive*
17 *d/b/a Kia of Orange*, Case No. 30-2017-00945105-CU-OE-CXC, California Superior Court,
18 Orange County, Judge Randall J. Sherman presiding (granting final approval settlement on behalf
19 of non-exempt commissioned employees involving claims for unpaid wages, meal and rest period
20 violations, unreimbursed business expenses, and penalty claims).

21 5. I have also moved to certify and have received an order certifying a class action in
22 *Ontiveros v. Safelite Fulfillment, Inc., et al.*, Case No. CV 15-7118-DMG (RAOx), United States
23 District Court, Central District of California, Honorable Dolly M. Gee presiding (certifying six
24 classes of employees for rest period violations, wage statement violations, meal period violations,
25 and overtime and double-time violations); and *Vazquez v. Kraft Heinz Foods Company*, Case No.
26 16-CV-02749-WQH (BLM), United States District Court, Southern District of California,
27 Honorable William Q. Hayes, presiding (certifying unpaid wages classes, meal period classes,
28 wage statement class, and waiting time penalty class).

1 6. In each year from 2018-2023, Thomson Reuters recognized me as a Top Young
2 Attorney in Southern California in the annual Rising Star Edition of Super Lawyers. This is an
3 honor awarded to no more than two-and-a-half percent (2.5%) of attorneys under the age of forty
4 in Southern California each year.

5 7. As counsel for Plaintiffs and the proposed Settlement Class, I have been intimately
6 involved in this case and I believe that the proposed Settlement is an excellent result for the
7 Settlement Class.

8 8. On December 21, 2021, Plaintiff Emmens, through my office, filed his Class
9 Action Complaint in Yolo County Superior Court, in the matter titled *Michael Emmens v.*
10 *Humano LLC*, Case No. CV2021-2225 (the “*Emmens Action*”), alleging that Humano: (i) failed
11 to pay all overtime wages; (ii) failed to provide all lawful meal periods; (iii) fail to provide all
12 lawful rest periods; (iv) wage statement violations; (v) waiting time penalties; and (vi) engaged
13 in unfair competition in violation of California Business & Professions Code § 17200 *et seq.* That
14 same day, Plaintiff Emmens sent his PAGA notice letter to the LWDA. Subsequently, on
15 February 25, 2022, Plaintiff Emmens filed a First Amended Class and Representative Action
16 Complaint (“FAC”) adding a cause of action for civil penalties under the Private Attorneys’
17 General Act of 2004, Labor Code Section 2698, *et seq.*

18 9. On January 3, 2022, Plaintiff Hines filed a Class Action Complaint against
19 Humano in Sacramento County Superior Court, in the matter entitled *Jermaine Hines v. Humano*
20 *LLC*, Case No. 34-2022-313411 (the “*Hines Action*”).

21 10. On or about May 12, 2022, Humano filed a Petition for coordination of the
22 *Emmens Action* and *Hines Action* (the “*Petition*”). On August 9, 2022, an order was entered
23 coordinating those actions in Yolo County Superior Court, designated as the “Humano Wage and
24 Hour Cases,” under Judicial Council Coordination Proceeding No. 5240.

25 11. On December 13, 2022, Doris J Thurman filed a Class Action complaint against
26 Humano in San Bernardino County Superior Court, in the matter entitled *Doris J. Thurman v.*
27 *Humano LLC*, Case No. CIVSB2227784 (the “*Thurman Action*”), alleging that Humano: (i)
28 failed to pay overtime wages; (ii) failed to provide all lawful meal periods; (iii) failed to provide

1 all lawful rest periods; (iv) failed to timely pay wages during employment; (v) failed to timely
2 pay earned wages at the time of separation of employment; (vi) failed to reimburse fees on use of
3 pay cards; (vii) failed to reimburse necessary business expenses; (viii) failed to accurately record
4 and pay sick leave; and (ix) engaged in unfair competition in violation of California Business &
5 Professions Code § 17200 *et seq.* Given the overlap of claims between the *Thurman* action and
6 the Humano Wage and Hour Cases, on or about July 3, 2023, Humano filed a petition to include
7 the *Thurman* action as an add-on case to the Humano Wage and Hour Cases. On October 13,
8 2023, the Court entered an order granting the petition. Accordingly, the Humano Wage and Hour
9 Cases (or Coordinated Action) consists of the *Emmens* Action, *Hines* Action, and *Thurman*
10 Action.

11 12. Prior to mediation, the Parties engaged in significant class certification discovery.
12 Plaintiffs served formal written discovery seeking among other things, class contact information
13 for the putative class, timekeeping and payroll records for Class Members, and Humano's written
14 wage and hour policies and procedures. The Parties completed a *Belaire-West* opt-out notice
15 process, and Plaintiffs' counsel was provided with the contact information for those Class
16 Members that did not opt-out. Thereafter, Plaintiffs' counsel interviewed Class Members
17 regarding their work experiences at Humano.

18 13. Prior to mediation, Humano produced timekeeping and payroll records for all
19 Class Members as well as a detailed Class List, which included Class Members' hire date and
20 termination dates (if applicable). Humano also provided its employee handbook(s) and written
21 wage and hour policies, as well as other information. Plaintiffs hired an expert to assist Plaintiffs
22 in conducting a comprehensive analysis of the payroll and timekeeping data produced by Humano
23 to create a detailed exposure analysis for all claims at issue. This discovery allowed the Parties to
24 assess the merits and value of Plaintiffs' claims, the chances of certification of Plaintiffs' claims,
25 and Humano's potential defenses.

26 14. On April 18, 2023, the Parties participated in a full-day mediation with Jeffrey
27 Ross, Esq., a preeminent wage and hour class action mediator. During mediation, the Parties
28 vigorously debated their opposing legal positions, the likelihood of certification of Plaintiffs'

claims, the legal basis for the claims and defenses, as well as Humano's financial condition. The Parties did not reach a settlement at mediation. In the months following mediation, Humano provided Plaintiffs' counsel with its financial records and Plaintiffs, with the help of their retained forensic accountant, reviewed the documents provided by Humano to determine Humano's ability to pay. Following the review of Humano's financials, the Parties continued their settlement discussions with Mr. Ross. Mr. Ross issued a mediator's proposal for a class-wide settlement, which was ultimately accepted by the Parties. During the months that followed, the Parties finalized the terms of the Settlement and executed the long-form settlement agreement.

15. Since undertaking representation of Plaintiff Emmens in this litigation, my office has borne all the costs of litigation for nearly three years without receiving any compensation to date. During this time, my office has incurred \$18,206.27 in litigation costs, and devoted substantial time to this litigation. Attached hereto as **Exhibit A** is a detailed line-item report reflecting these costs, which include filing fees, services fees, expert costs, mediation costs, and postage.

16. Class Counsel's fee request of \$500,000.00 (one-third of the Gross Settlement Amount) is fair and reasonable based on a percentage of the recovery. This is also consistent with my experience in similar wage and hour class action matters. Plaintiffs submit the requested fee is fair compensation for undertaking complex, risky, expensive, and time-consuming litigation on a purely contingent fee basis. Class Counsel has incurred substantial attorneys' fees conducting pre-filing investigation, analyzing Plaintiffs' claims, conducting legal research, conducting extensive informal and formal discovery, meeting and conferring with Humano regarding their discovery responses, completing a *Belair-West* notice procedure and interviewing Class Members, analyzing Class Members' timekeeping and payroll records with the help of a retained expert, creating a comprehensive damages model, preparing for and attending mediation, reviewing Humano's financials with the help of a retained forensic accountant, negotiating and preparing the long-form Settlement Agreement, preparing the Motion for Preliminary Approval, overseeing the Notice process and fielding questions from Settlement Class members, preparing the Final Approval papers, attending the Final Approval hearing, and otherwise litigating the case.

1 17. In this case, my firm has a lodestar of approximately \$173,467.50. A general
2 summary showing the number of hours of work performed by each attorney and paralegals is set
3 forth below.

Name	Rate	Hours	Pre-Multiplier Lodestar
Paul K. Haines (18th Year Attorney)	\$850	23.7	\$20,145.00
Sean M. Blakely (15th Year Attorney)	\$750	108.4	\$81,300.00
Tuvia Korobkin (14th Year Attorney) (Former Partner)	\$750	33.6	\$25,200.00
Neil M. Larsen (13th Year Attorney) (Former Associate)	\$650	68.4	\$44,460.00
Firm Paralegals	\$175	13.5	\$2,362.50
Total Lodestar			\$173,467.50

12 18. My proposed hourly rate of \$750, Mr. Haines' proposed hourly rate of \$850, Mr.
13 Korobkin's proposed hourly rate of \$750, Mr. Larsen's proposed hourly rate of \$650, and the
14 proposed \$175 hourly rate for paralegals, are reasonable in light of our respective skills, wage
15 and hour class action experience, reputation, and fee awards to other attorneys of similar
16 experience in California and are in line with rates at which I and the other attorneys in my firm
17 have been approved in other matters. The respective hourly rates are also in line with the current
18 *Laffey* Matrix, a true and correct copy of which is attached hereto as **Exhibit B**.

19 19. Plaintiffs will apply for Class Representative Enhancement Payments at the time
20 of seeking final approval of the proposed class action settlement in the amount of \$10,000 each,
21 for a total of \$30,000, for their service to the Settlement Class. Plaintiffs' requested Enhancement
22 Payments are intended to recognize the time and effort Plaintiffs expended on behalf of the
23 Settlement Class, including providing substantial factual information and documents to Class
24 Counsel, discussing the claims and theories at issue in the litigation, actively participating in the
25 prosecution of their claims, as well as the significant risks Plaintiffs undertook by agreeing to
26 serve as the named plaintiffs in this case, and the fact that Plaintiffs agreed to a general release of
27 all claims subject to a waiver of Civil Code § 1542.
28

20. I do not have any personal or financial interest, relationship, or involvement with the proposed *cy pres* recipient, Legal Aid At Work.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on November 6, 2024, at El Segundo, California.

Sen Blahf

Sean M. Blakely

EXHIBIT A

November 06, 2024

Michael Emmens

Additional Charges :

		<u>Qty/Price</u>	<u>Amount</u>
12/21/2021	KI Filing Fee for: LWDA Case Number: CM-858697-21	1 75.00	75.00
12/27/2021	KI One Legal Jury Fees Order #: 17406214 Court Trans #: 7908121	1 150.00	150.00
	KI One Legal Filing Fee for: Civil Case Cover Sheet, Summons Issued, Filed Case Management, Status Conference Statement, Advance Order Number 17406214	1 1,499.52	1,499.52
12/31/2021	PKH Postage for December, 2021.	1 6.33	6.33
	PKH Westlaw cost for December, 2021.	1 23.15	23.15
	PKH Copying cost for December, 2021.	22 0.25	5.50
1/31/2022	PKH Postage for January, 2022.	1 6.33	6.33
	PKH Copying cost for January, 2022.	18 0.25	4.50
2/1/2022	KI First Legal Service Fee for: Summons, Complaint, CCCS, ADR Info Sheet, Notice of CMC (3-day) Order #: 4885599 Process - 3 days Base charge + PDF/Ship + Fuel charge	1 74.81	74.81
2/3/2022	KI One Legal Filing Fee for: Proof of Service. Order #: 17633072	1 17.65	17.65

11/6/2024

		<u>Qty/Price</u>	<u>Amount</u>
2/28/2022	KI One Legal Filing Fee for: Amended Complaint Filed - No Fee. Order #: 17755112	1 17.65	17.65
3/31/2022	KI First Legal Service Fee for: First Amended Class Action Complaint to Humano LLC (3 day). Order #: 4942427 Process - 3 days Base charge + PDF/Ship + Fuel charge	1 71.81	71.81
4/4/2022	KI One Legal Filing Fee for: Proof of Service. Order #: 17973491	1 18.16	18.16
4/6/2022	KI One Legal Filing Fee for: Case Management/ Status Conference Statement. Order #: 17966738	1 18.16	18.16
4/30/2022	ALL Postage for April, 2022.	1 0.73	0.73
6/2/2022	KI One Legal Filing Fee for: Case Management, Status Conference Statement. Order #: 18314546	1 18.16	18.16
6/30/2022	ALL Postage for June, 2022.	1 0.73	0.73
9/30/2022	ALL Postage for September, 2022.	1 2.16	2.16
1/17/2023	PKH Jeff Ross Mediation - Invoice #2374 4/18/23 Mediation	1 6,250.00	6,250.00
1/31/2023	ALL Copying cost for January, 2023.	2 0.25	0.50
3/14/2023	IDLC Document purchase for: Notice of appearance, stipulation and order. Receipt#: 1230314J5297	1 7.00	7.00
3/31/2023	ALL Pacer expense for March, 2023.	1 0.50	0.50
6/6/2023	IDLC ILYM service fee for generic notice, postage, re-mails, NCOA, Certified Spanish translation, weekly updated reports, waived-weekly updated reports, Discount split cost. Invoice #: N/A FedEx Tracking #: 774409315662	1 7,166.87	7,166.87
8/9/2023	IDLC Keith D. Messerschmidt Expert fee for services rendered through July 1, 2023 - July 24, 2023.	1 2,632.50	2,632.50

11/6/2024

			<u>Qty/Price</u>	<u>Amount</u>
8/31/2023	ALL	Copying cost for August, 2023.	3 0.25	0.75
11/30/2023	ALL	Copying cost for November, 2023.	2 0.25	0.50
12/31/2023	ALL	Copying cost for December, 2023.	1 0.25	0.25
	IDLC	FedEx for December, 2023.	1 16.70	16.70
2/26/2024	ALL	One Legal's Filing fee for: Report Order #: 22304244	1 20.68	20.68
3/4/2024	ALL	First Legal's filing fee for: Notice of Ruling Order #: 5639441 Direct E-filing Base charge + Additional charges	1 17.10	17.10
6/27/2024	ALL	First legal's filing fee for: Motion,Declaration,Declaration,Declaration,Declaration,Declaration,Decl aration,Declaration,Declaration Order #: 23213469	1 82.57	82.57
Total additional charges				<u>\$18,206.27</u>
Balance due				<u><u>\$18,206.27</u></u>

EXHIBIT B

LAFFEY MATRIX

[History](#)
[Case Law](#)
[See the Matrix](#)
[Contact us](#)
[Home](#)

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
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
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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.