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SUPERIOR COURT OF CALIFORNIA
IN AND FOR THE COUNTY OF ORANGE

THANH PHAN, an individual, on behalf of
herself and on behalf of all persons similarly
aggrieved,

Plaintiffs,
vs.

ST. JUDE MEDICAL CENTER, a California
corporation; ST. JUDE HOSPITAL, a
California Corporation; and DOES 1-50,
Inclusive,

Defendants.

MARK MORANVILLE, as an individual on
behalf of himself and on behalf of all others
similarly situated,

ST. JUDE HOSPITAL, a California
Corporation; ST. JUDE HERITAGE
MEDICAL
GROUP, A MEDICAL CORPORATION, a
California Corporation;

Case No. **30-2022-01244478-CU-OE-CXC**
[Consolidated with Case No.
30-2022-01246853-CU-OE-CXC]

Assigned for All Purposes to:
Hon. William Claster
Dept. CX-101

**DECLARATION OF SEPIDEH
ARDESTANI IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT AND REQUEST FOR
ATTORNEY'S FEES AND COSTS**

Date: September 13, 2024
Time: 9:00 a.m.
Dept.: CX-101

DECLARATION OF SEPIDEH ARDESTANI

I, SEPIDEH ARDESTANI, Declare:

1. I am an attorney duly licensed to practice in California and before this Court, and I am an attorney at Crosner Legal, PC, co-counsel of record for Plaintiffs. I make this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Request for Attorney's Fees and Costs. If called to testify as to the within facts, I would and could competently do so.

2. Crosner Legal, P.C. is co-counsel representing Plaintiff Mark Moranville in the above-entitled action.

3. I am unaware of any conflict of interest between myself or my law firm and any member of the proposed Class which should or would preclude me from representing the Class. I also am unaware of any other cases involving the same claims and/or parties other than the two matters that are the subject of this settlement.

4. Through formal and informal discovery, before the mediation Defendants produced time and pay records, wage statements, documents regarding its wage and hour policies and practices during the class period, a class list, and information the total number of current and former employees, the estimated total amount of workweeks and pay periods, their average hourly rate, and other relevant data.

5. After reviewing documents regarding Defendants' wage and hour policies and practices, and analyzing Defendant's time and pay records, and sending surveys to class members, we were able to evaluate the probability of class certification, success on the merits, and Defendants' maximum monetary exposure for all claims. We reviewed these records and prepared a damage analysis prior to mediation. We also investigated the applicable law regarding the claims and defenses asserted in the litigation. Thus, we are familiar with the facts of the case and the legal issues raised by the pleadings and were able to act intelligently in negotiating the settlement.

6. The Parties resolved this matter via private mediation with professional neutral Jeff Krivis, Esq. The settlement negotiations were at arm's length and, although conducted in a

1 professional manner, were adversarial. The parties went into the mediation willing to explore the
2 potential for a settlement of the dispute, but each side was also prepared to litigate their or its
3 position through trial and appeal if a settlement had not been reached. After extensive
4 negotiations and discussions regarding the claims and defenses in this action, as well as the risks
5 involved in further litigation, the Parties reached agreement on all material terms.

6 7. My office, along with co-counsel, has conducted a thorough investigation into the
7 facts of this case. Based on the foregoing informal discovery and independent investigation and
8 evaluation, I am of the opinion that the Settlement is fair, reasonable, and adequate and is in the
9 best interests of the Settlement Class Members in light of all known facts and circumstances, the
10 risk of significant delay, the defenses that could be asserted by Defendant both to certification and
11 on the merits, trial risk, and appellate risk

12 8. Although we believe that we could have prevailed, there was no guarantee that
13 Plaintiff would prevail on his theories. When the risks of prevailing at both certification and trial
14 are factored into the equation, the settlement value is reasonable and supported, as the \$950,000
15 total recovery on behalf of the class represents a substantial part of the maximum exposure.
16 Notably, the assigned certification probabilities far exceed the rate of certification in contested
17 motions in California over the past 5 years, based upon data available through the California
18 Courts website. *See, Findings of the Study of California Class Action Litigation, 2000-2006*,
19 available at <http://www.courts.ca.gov/documents/class-action-lit-study.pdf> (finding that only
20 21.4% of all class actions were certified either as part of a settlement or as part of a contested
21 certification motion). In other words, well under 20% of all class actions are certified by way of
22 contested motion.

23 9. While Plaintiffs, co-counsel and I are confident in the merits of his claims, a
24 legitimate controversy exists as to each cause of action. We also recognized that proving the
25 amount of wages due to each Class Member would be an expensive, time-consuming, and
26 uncertain proposition.

27 10. The settlement obviates the significant risk that this Court may deny certification
28 of all or some of Plaintiffs' claims. Furthermore, even if Plaintiffs obtained certification of all or

1 some of the claims, continued litigation would be expensive, involving a trial and possible
2 appeals, and would substantially delay and reduce any recovery by the Settlement Class
3 Members.

4 11. In sum, when the risks of litigation, the uncertainties involved in achieving class
5 certification, the burdens of proof necessary to establish liability, and the probability of appeal of
6 a favorable judgment are accounted for, it is clear the overall amount of \$4,000,000 is within the
7 “ballpark” of reasonableness. Coupled with the fact that there were no objections and no one
8 opted out of the Settlement, I respectfully submit final settlement approval is appropriate.

9 12. Through the filing the motion for final approval, Crosner Legal’s lodestar is
10 \$273,415.00, based on 373.70 attorney hours litigating the case. True and correct copies of
11 Crosner Legal’s work performed and time expended for all time keepers on this matter are
12 attached hereto as **Exhibit A**.

13 13. All of this time was reasonable and necessary to achieve the excellent settlement
14 for the Class.

15 14. Additional time will be incurred following final approval of the settlement. Based
16 on my experience, we will field a large number of phone calls and e-mails from class members
17 asking about the status of the settlement, when they can expect their settlement checks, income
18 tax issues, etc. We also will have additional communications with the Settlement Administrator
19 during the distribution process and regarding the final compliance report.

20 15. I graduated from the University of California, Los Angeles in 2004 with a
21 bachelor’s in science. I then graduated from Whittier Law School in 2009 after earning my
22 J.D., and I later earned an L.L.M. from Santa Clara University School of Law in 2010. I have
23 been a member of the California Bar since 2010 and have extensive experience in employment
24 matters, including wage and hour litigation. I worked as a wage and hour class action attorney
25 at Gaines & Gaines, APLC from 2012 through 2021. Prior to joining Gaines & Gaines, APLC, I
26 worked at Sirkin Law Group, P.C. as a litigation associate from 2010-2012. I joined Crosner
27 Legal in December 2021 as a senior associate. I’ve solely handled employment, wage and hour
28 class actions, and PAGA lawsuits for twelve years. I was selected for 2020-2021 by Super

1 Lawyers as a “Southern California Rising Star” for employment and labor law.

2 16. Zach Crosner is a 2010 graduate of University San Diego School of Law and he
3 has approximately fourteen years of experience as a practicing attorney. For nearly his entire
4 career, his practice has focused on litigation of wage & hour, consumer, and privacy class
5 action and representative action claims. Following graduation he immediately began working
6 for a nationally recognized plaintiff’s complex litigation firm, CaseyGerry, where he worked
7 directly with past presidents of the consumer attorneys and recipients of trial attorneys of the
8 year awards. He also worked for other firms that included former CAALA and CLAY trial
9 attorney of the year recipients. While with these firms, he advocated for the rights of consumers
10 and employees in class action litigation, civil rights and employment litigation, catastrophic
11 injuries, insurance bad faith and appellate litigation.

12 17. In 2013, he founded the law firm of Crosner Legal, P.C. which since its inception
13 has focused almost exclusively on plaintiff-side class actions lawsuits representing employees,
14 consumers and other victims. Currently, over ninety percent (95%) of his practice is dedicated
15 exclusively to the prosecution of class actions and representative action lawsuits, and his law
16 firm is currently responsible as lead counsel or co-lead counsel for prosecuting over one
17 hundred (100) active wage and hour class actions and/or PAGA representative actions, as well
18 as a multitude of consumer and privacy class actions, in both federal and state courts throughout
19 California. He has been a direct participant in over one hundred (100) class action and/or
20 representative action settlements where he has been approved as adequate lead counsel.

21 18. Mr. Crosner has been selected by Super Lawyers as a “Southern California
22 Rising Star” for employment and labor law consecutively from 2018 through 2023. Super
23 Lawyers has also named me on their “Up-and-Coming 100” Southern California Rising Stars
24 List for consecutive years from 2021 through 2023. Only 2.5% of lawyers within California are
25 named a Super Lawyer Rising Star and even less are added to their Top Lists. Additionally, he
26 has been selected as a Top 40 Under 40 Civil Plaintiff Attorney by the National Trial Lawyers,
27 invitation-only organization composed of the premier trial lawyers, from 2019 through 2023.
28 He is an active participant in advocacy groups, including as an executive board member of the

1 Wage and Hour Committee and the Legislative Committee for the California Employment
2 Lawyers Association; a member of the Grassroots Advocacy Team for the National
3 Employment Lawyers Association; Wage and Hour Committee member and Class Action
4 Committee member for the National Trial Lawyers; a member of the American Association for
5 Justice; and a member of the Pound Civil Justice Institute.

6 19. Jamie Serb is a partner with Crosner Legal and head of the firm's Wage and Hour
7 Practice Group. She graduated from the University of California, San Diego in 2004, graduated
8 from California Western School of Law in 2013, and has been a member of the California Bar
9 since 2013. She has extensive experience in wage and hour litigation, beginning work as a class
10 action attorney in 2015 at the Mara Law Firm, PC (previously Turley & Mara Law Firm, APLC;
11 Turley Law Firm, APLC). She has handled wage and hour class actions and PAGA lawsuits for
12 some eight years and has assisted in obtaining millions of dollars for employees during her years
13 of practice.

14 20. Kiara Bramasco received her undergraduate degree, magna cum laude, from
15 Loyola Marymount University in Political Science, and then received her JD from Loyola Law
16 School in 2018. She then spent several years with well-known plaintiff's firm Moss Bollinger,
17 first as a law clerk and then as an associate, where her practice focused on employment law,
18 particularly wage and hour class action and PAGA litigation. She joined Crosner Legal in 2021
19 and is head of the firm's Prelitigation Department.

20 21. Branden Hamilton obtained her undergraduate degree from UCLA in 2004, and
21 her law degree from George Washington University in 2007. She has been affiliated with my
22 firm since 2017 and became Of Counsel with Crosner Legal in 2019, and her practice focuses
23 almost exclusively on wage and hour class and representative actions. She has spent her entire
24 career representing plaintiffs in employment litigation, including several years as an associate at
25 well-known plaintiff's firm Carlin & Buchsbaum.

26 22. Blake R. Jones graduated from the University of Missouri in 1996 with academic
27 honors, and graduated from Tulane Law School, magna cum laude, in 2000, where he served on
28 the Moot Court Board. Mr. Jones began working as an attorney that same year for Luce, Forward,

1 Hamilton & Scripps, LLP. He left with his mentor in 2004 to open the San Diego office of
2 Hooper, Lundy & Bookman, where he became a partner in 2008. Mr. Jones joined Gordon &
3 Rees, LLP, in 2011 and served as a partner in its Employment Law practice group until 2020. He
4 worked with my firm as “of counsel” from 2020-22. Mr. Jones has represented both employees
5 and employers in several hundred cases in both state and federal courts, including at least a
6 hundred wage and hour class actions and Private Attorney General Representative Actions. He
7 has obtained millions of dollars for employees in these cases.

8 23. Jonathan Stilz graduated from the University of California, San Diego, in 2010,
9 and graduated cum laude from California Western School of Law in 2015. Mr. Stilz has extensive
10 experience in employment matters, including wrongful termination, class action, and
11 representative PAGA lawsuits. Mr. Stilz formerly worked at a national firm defending employers
12 in various employment related matters prior to joining Crosner Legal in October, 2021, as an
13 associate attorney. Mr. Stilz has been litigating for over nine years and has vigorously advocated
14 for his clients during his years of practice.

15 24. Crosner Legal, P.C. has obtained several multi-million dollar wage and hour class
16 action settlements while serving as lead class counsel in recent years, including but not limited to
17 a \$1.9 million wage and hour class action settlement in 2015 (*Smith v. Lux Retail North America,*
18 *Inc.*, Case No. 3:13-cv-01579-WHA (N.D. Cal.)); a \$4.1 million wage and hour class action
19 settlement in 2016 (*Aguirre v. Mariani Nut Company, Inc. et al.*, Case No. 34- 2016-00190252
20 (Sacramento Cty. Super Ct.)); a \$1.35 million wage and hour class action settlement in 2017
21 (*Montelone v. Ocean Cities Pizza, Inc.*, Case No. 56-2014-00458249 (Ventura Cty. Super. Ct.)), a
22 \$1.8 million wage and hour class action settlement in 2018 (*Latham v. K.W.P.H. Enterprises, Inc.*
23 *dba American Ambulance*, Case No. 17C-0162 (Kings Cty. Super Ct.)), a \$1.3 million wage and
24 hour class action settlement in 2019 (*Means, et al. v. AirGas USA, LLC*, Case No. 17-CV-2160
25 JGB (C.D. Cal.)), a \$1.5 million wage and hour settlement in 2020 (*Babouchian, et al. v.*
26 *Wyndham Vacation Ownership, et al.*, Case No. CV18-14601 (San Diego Cty. Super. Ct.)), a
27 \$1.15 million wage and hour class action settlement in 2020 (*Buford v. Medical Solutions LLC*,
28 Case No. 4:18-CV-04864-YGR (N.D.Cal.)); a \$7.25 million wage and hour class action

1 settlement in 2020 in *Avina, et al. v. First Alarm Security & Patrol, Inc.*, Case No. 18CV323753
2 (Santa Clara Cty. Super Ct.); a \$2.2 million wage and hour class action settlement in 2021
3 (*Ghorchian, et al. v. West Hills Hospital, et al.*, Case No. LS029737 (Los Angeles Cty. Super.
4 Ct.)); a \$2.85 million dollar wage and hour settlement in 2021 (*Valencia v. The Original*
5 *Mowbray's Tree Service, Inc.*, Case No. CIVDS1825518 (San Bernardino Cty. Super. Ct.)); a \$1
6 million wage and hour class action settlement in 2022 (*Duong v. Loan Factory, Inc.*, Case No.
7 21CV382467 (Santa Clara Cty. Super. Ct.)), a \$1.4 million wage and hour class action settlement
8 in 2023 in *Correa, et al. v. FedEx Supply Chain, Inc.*, Case No. CIVDS2023369 (San Bernardino
9 Cty. Super. Ct.), a \$2.38 million wage and hour class action settlement in 2023 in *Michel, et al. v.*
10 *Valley Thrift Store, Inc.*, Case No. 21STCV00925 (Los Angeles Cty. Super. Ct.); a \$2.5 million
11 wage and hour class action settlement in 2023 in *Jajuga v. Pilot Travel Centers*, Case No.
12 CIVDS1931464 (San Bernardino Cty. Super. Ct.); \$1.015 million wage and hour class action
13 settlement in 2023 in *Gotishan v. Kyo Autism Therapy*, Case No. CGC-21-596378 (San Francisco
14 Cty. Super. Ct); and a \$1.15 million wage and hour PAGA settlement in 2023 in *Vaughn v.*
15 *Public Health Foundation Enters., Inc.*, Case No. 21STCV18512 (Los Angeles Cty. Super. Ct.); a
16 \$1.5 million wage and hour class action settlement in *McKinnie v. Iron Mountain*, Case No.
17 21STCV05707 (Los Angeles Cty. Super. Court); a \$1.3 million wage and hour class action
18 settlement in *Ellsworth, et al. v. Hallcon*, Case No. 20STCV06618 (Los Angeles Cty. Super.
19 Court); a \$1.925 million wage and hour class settlement in 224 in *Lo v. Cyberpower, Inc.*, Case
20 No. 21STCV31479 (Los Angeles Cty. Super. Ct); and a \$1.19 million dollar wage and hour class
21 action settlement in 2024 in *Herrera v. Signature Flight Support LLC*, Case No. 22STCV18367
22 (Los Angeles Cty. Super. Ct.).

23 25. Based upon the qualifications and experience set forth above, an hourly rate for
24 Zachary M. Crosner of \$800 is reasonable, as is an hourly rate of \$750/hour for Jamie Serb,
25 \$700/hour for myself, \$900 for Blake Jones, \$650/hour for Kiara Bramasco and Jon Stilz, and
26 \$600/hour for Branden Hamilton.

27 26. The requested rates also comport with the adjusted Laffey Matrix, which provides
28 that reasonable hourly rates for attorneys with 10+ years of experience, such as Mr. Crosner, Ms.

Serb, and myself, have are over \$800/hour. The adjusted Laffey Matrix may be found at <http://www.laffeymatrix.com/see.html>.

27. Based the lodestar analysis above, Crosner Legal's base lodestar is \$273,415.00, based on 373.70 attorney hours spent litigating the case. Attached hereto as **Exhibit A** is a true and correct copy of Crosner Legal's timesheets.

28. As noted, Crosner Legal has represented Plaintiffs for nearly three years with respect to this matter and has expended a significant amount of time and resources in that representation. My firm agreed to litigate this case on a purely contingent basis and in so doing assumed considerable risk of non-payment for its fees and costs, as discussed above, and as is the case with these cases in general. Under all relevant factors (as outlined herein and in the accompanying memorandum), Plaintiffs respectfully request the Court award their counsel the requested fees of \$1,333,333.33 based on the common fund theory with a corresponding lodestar cross-check as addressed in the memorandum filed herewith. These fees will be split between Crosner Legal and my co-counsel per a written fee sharing agreement. Plaintiffs have been advised of the fee split and consented thereto in writing.

29. Class Counsel's litigation costs and expenses are capped at \$20,000 under the terms of the Settlement Agreement. A true and correct itemization of the costs and expenses incurred by Crosner Legal is set forth below:

DESCRIPTION	AMOUNT
Filing Fees/Service of Process/Attorney Service	\$1,868.21
Mediation Expenses	\$5,000.00
PAGA Filing Fee	\$75.00
Legal Research	(waived)
Postage/Delivery	34.55
Photocopies	(waived)
Total Costs Requested	\$6,977.76

I there respectfully request the Court authorize reimbursement of Crosner Legal's costs in the amount of \$6,977.76, and further approve our co-counsel's costs.

1 30. For all the foregoing reasons, I respectfully request that the Court approve the
2 settlement in all particulars.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct. Executed this 20th day of August, at Los Angeles, California.

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7 Declarant
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Exhibit A

Moranville, Mark (00554) v. St. Jude Hospital, [Case No. 30-2022-01246853-CU-OE-C... 

00554-Moranville 

Cost >

Lodestar >

Moranville, Mark (00554) v. St. Jude Hospital, [Case No. 30-2022-01246853-CU-OE-CX, (Orange col

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373.70

Total Lodestar

\$273,415.00

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Wage & Hour Attorney / Lodestar-Print2

CLIO Matter	Time(hours)	For Attorney/Par...	Hou...	Custom Hou...	Category	Description	Total
00554-Moranville	10.00	Sepideh Ardes	\$700	–	Mediation	Attend mediation	\$7,000.00
00554-Moranville	10.00	Jamie Serb	\$750	–	Mediation	prepare for and attend mediation	\$7,500.00
00554-Moranville	2.90	Jamie Serb	\$750	–	Case Management	review docs, briefs for mediation, discuss theories internally	\$2,175.00
00554-Moranville	1.60	Sepideh Ardes	\$700	–	Settlement	review/revise MOU	\$1,120.00
00554-Moranville	7.50	Sepideh Ardes	\$700	–	Motions/Pleadings	review/revise MPA; Decl of SA; Decl of client	\$5,250.00
00554-Moranville	6.80	Sepideh Ardes	\$700	–	Motions/Pleadings	review/revise MFA; Decl of SA; decl of client	\$4,760.00
00554-Moranville	0.50	Sepideh Ardes	\$700	–	Case Management	several calls with client re case update	\$350.00
00554-Moranville	2.50	Sepideh Ardes	\$700	–	Settlement	Review/revise SA	\$1,750.00

00554-Moranville	5.00	Sepideh Ardes	\$700	–	Case Management	review case file and discuss case with former atty	\$3,500.00
00554-Moranville	12.50	Sepideh Ardes	\$700	–	Mediation	draft mediation brief; research case law; review damage analysis	\$8,750.00
00554-Moranville	0.50	Sepideh Ardes	\$700	–	Case Management	call with co counsel in advance of mediation	\$350.00
00554-Moranville	0.50	Sepideh Ardes	\$700	–	Case Management	call with OC in advance of mediation	\$350.00
00554-Moranville	1.50	Sepideh Ardes	\$700	–	Case Management	draft joint statement for 9/25/23 hearing	\$1,050.00
00554-Moranville	2.00	Sepideh Ardes	\$700	–	Hearing	attend MPA hearing	\$1,400.00
00554-Moranville	0.50	Sepideh Ardes	\$700	–	Case Management	draft CMS for 9/25/23 hearing	\$350.00
00554-Moranville	0.50	Sepideh Ardes	\$700	–	Case Management	draft CMS for 10/20/22 hearing	\$350.00
00554-Moranville	6.50	Sepideh Ardes	\$700	–	Motions/Pleadings	review SAC	\$4,550.00

00554-Moranville	1.50	Sepideh Ardes	\$700	–	Hearing	attend status conf 6/10/22	\$1,050.00
00554-Moranville	2.00	Sepideh Ardes	\$700	–	Hearing	attend status conf 9/14/22	\$1,400.00
00554-Moranville	5.00	Sepideh Ardes	\$700	–	Motions/Pleadings	review FAC	\$3,500.00
00554-Moranville	2.00	Sepideh Ardes	\$700	–	Hearing	attend status conf 10/25/22	\$1,400.00
00554-Moranville	12.50	Sepideh Ardes	\$700	–	Mediation	review all informal disco; calls/emails with expert	\$8,750.00
00554-Moranville	2.00	Sepideh Ardes	\$700	–	Case Management	review related case and draft memo of overlapping claims	\$1,400.00
00554-Moranville	0.60	Sepideh Ardes	\$700	–	Case Management	call with co counsel re JPA and claims	\$420.00
00554-Moranville	3.50	Sepideh Ardes	\$700	–	Motions/Pleadings	review/revise supp MPA docs	\$2,450.00
00554-Moranville	3.50	Sepideh Ardes	\$700	–	Motions/Pleadings	review/revise second supp MPA docs	\$2,450.00

00554-Moranville	1.80	Sepideh Ardes	\$700	–	Motions/Pleadings	read and draft memo re Def's oppn to MPA	\$1,260.00
00554-Moranville	0.50	Sepideh Ardes	\$700	–	Case Management	call with OC and co counsel re Def's oppn to MPA	\$350.00
00554-Moranville	1.50	Sepideh Ardes	\$700	–	Hearing	attend status conf 12/13/23	\$1,050.00
00554-Moranville	1.50	Sepideh Ardes	\$700	–	Hearing	attend status conf 10/2/23	\$1,050.00
00554-Moranville	1.60	Kiara Bramasc	\$650	–	Other	Call with client, follow up on intake questions, prep Qs for call	\$1,040.00
00554-Moranville	2.20	Kiara Bramasc	\$650	–	Other	Review personnel file and payroll records	\$1,430.00
00554-Moranville	5.80	Kiara Bramasc	\$650	–	Other	Drafting PAGA notice	\$3,770.00
00554-Moranville	7.50	Kiara Bramasc	\$650	–	Motions/Pleadings	Drafting/filing class complaint	\$4,875.00
00554-Moranville	5.50	Kiara Bramasc	\$650	–	Motions/Pleadings	Drafting FAC	\$3,575.00

00554-Moranville	3.70	Kiara Bramasc	\$650	–	Motions/Pleadings	Drafting SAC adding PAGA	\$2,405.00
00554-Moranville	2.90	Kiara Bramasc	\$650	–	Motions/Pleadings	Drafting Consolidated complaint	\$1,885.00
00554-Moranville	0.20	Kiara Bramasc	\$650	–	Research	Searching for AWS results for St Jude	\$130.00
00554-Moranville	2.60	Kiara Bramasc	\$650	–	Research	Pre-existing case search	\$1,690.00
00554-Moranville	3.50	Jonathan Stilz	\$650	–	–	Review case file, including LWDA letter and complaint	\$2,275.00
00554-Moranville	0.80	Jonathan Stilz	\$650	–	–	Review arbitration agreement	\$520.00
00554-Moranville	0.90	Jonathan Stilz	\$650	–	–	Prep for and attend cmc hearing	\$585.00
00554-Moranville	8.50	Jonathan Stilz	\$650	–	–	Draft mediation brief; pull exhibits; research case law; assemble	\$5,525.00
00554-Moranville	0.40	Jonathan Stilz	\$650	–	–	Emails with OC re formal disco stay pending mediation	\$260.00

00554-Moranville	0.80	Jonathan Stilz	\$650	–	–	Review Demurrer in Phan case	\$520.00
00554-Moranville	3.10	Jonathan Stilz	\$650	–	–	Research case law re arbitration agreement	\$2,015.00
00554-Moranville	0.60	Jonathan Stilz	\$650	–	–	Calls and emails with OC re disco production	\$390.00
00554-Moranville	10.00	Jonathan Stilz	\$650	–	–	Attend mediation	\$6,500.00
00554-Moranville	0.40	Jonathan Stilz	\$650	–	–	Several emails with co counsel re mediation	\$260.00
00554-Moranville	0.40	Jonathan Stilz	\$650	–	–	Call with MP re Phan case	\$260.00
00554-Moranville	0.60	Jonathan Stilz	\$650	–	–	Review and revise joint statement re CMC	\$390.00
00554-Moranville	6.50	Jonathan Stilz	\$650	–	–	Draft formal discovery and notice of depo of Def's PMK	\$4,225.00
00554-Moranville	0.50	Jonathan Stilz	\$650	–	–	Review Phan case complaint	\$325.00

00554-Moranville	5.80	Jonathan Stilz	\$650	–	–	Review and revise consolidated complaint	\$3,770.00
00554-Moranville	0.50	Jonathan Stilz	\$650	–	–	Call with OC re Mx to strike letter	\$325.00
00554-Moranville	0.80	Jonathan Stilz	\$650	–	–	Call with co counsel re Phan case	\$520.00
00554-Moranville	1.50	Jonathan Stilz	\$650	–	–	Review letter from OC re Mx to Strike	\$975.00
00554-Moranville	0.60	Jonathan Stilz	\$650	–	–	Review Def's answer to consolidated complaint	\$390.00
00554-Moranville	0.50	Jonathan Stilz	\$650	–	–	Call with managing partner re case strategy	\$325.00
00554-Moranville	0.60	Jonathan Stilz	\$650	–	–	Review revisions to consolidated complaint	\$390.00
00554-Moranville	1.60	Jonathan Stilz	\$650	–	–	Draft informal discovery letter	\$1,040.00
00554-Moranville	0.50	Jonathan Stilz	\$650	–	–	Introductory call with OC to discuss case strategy	\$325.00

00554-Moranville	0.40	Jonathan Stilz	\$650	–	–	Review mediation docs from Krivis office	\$260.00
00554-Moranville	1.60	Jonathan Stilz	\$650	–	–	Draft MOU	\$1,040.00
00554-Moranville	0.90	Jonathan Stilz	\$650	–	–	Review and revise joint stip to consolidate cases	\$585.00
00554-Moranville	0.40	Jonathan Stilz	\$650	–	–	Call with co counsel re Def's edits to consolidated complaint	\$260.00
00554-Moranville	0.60	Jonathan Stilz	\$650	–	–	Several emails with co counsel re consolidation stip and complaint	\$390.00
00554-Moranville	3.50	Jonathan Stilz	\$650	–	–	Research case law re Mx to Strike	\$2,275.00
00554-Moranville	0.80	Jonathan Stilz	\$650	–	–	Research re case consolidation in OC courts	\$520.00
00554-Moranville	5.50	Jonathan Stilz	\$650	–	–	Draft FAC and email to OC	\$3,575.00
00554-Moranville	0.50	Jonathan Stilz	\$650	–	–	Call with MP re Mx to Strike letter	\$325.00

00554-Moranville	0.40	Jonathan Stilz	\$650	–	–	Emails with client re mediation	\$260.00
00554-Moranville	1.50	Jonathan Stilz	\$650	–	–	Draft JPA with Phan counsel	\$975.00
00554-Moranville	0.50	Jonathan Stilz	\$650	–	–	Several emails with client re 401k	\$325.00
00554-Moranville	0.50	Jonathan Stilz	\$650	–	–	Review Def's answer	\$325.00
00554-Moranville	1.80	Jonathan Stilz	\$650	–	–	Research case law re Demurrer	\$1,170.00
00554-Moranville	0.40	Jonathan Stilz	\$650	–	–	Several emails with co counsel and OC re mediation dates	\$260.00
00554-Moranville	0.90	Jonathan Stilz	\$650	–	–	Draft joint report for cmc	\$585.00
00554-Moranville	0.60	Jonathan Stilz	\$650	–	–	Call with co counsel and OC re mediation and mediator selection	\$390.00
00554-Moranville	6.50	Jonathan Stilz	\$650	–	–	Review informal discovery production and calls/emails with expert re damage analysis	\$4,225.00

00554-Moranville	0.50	Jonathan Stilz	\$650	–	–	Introductory call with client	\$325.00
00554-Moranville	0.40	Jamie Serb	\$750	–	–	discuss mediation/stay with associate	\$300.00
00554-Moranville	0.30	Jamie Serb	\$750	–	–	review joint statement	\$225.00
00554-Moranville	0.30	Jamie Serb	\$750	–	–	em exchange re enhancements	\$225.00
00554-Moranville	0.40	Jamie Serb	\$750	–	–	review em exchange re time/pay records	\$300.00
00554-Moranville	1.40	Jamie Serb	\$750	–	–	discussion w/associate re case status, mediation brief arguments	\$1,050.00
00554-Moranville	0.50	Jamie Serb	\$750	–	–	review MPA tentative and discuss internally	\$375.00
00554-Moranville	0.40	Jamie Serb	\$750	–	–	review em exchange re enhancement and discuss with associate	\$300.00
00554-Moranville	0.40	Jamie Serb	\$750	–	–	review oppo to MPA and internal discussion re same	\$300.00

00554-Moranville	0.30	Jamie Serb	\$750	–	–	review em exchange re depos	\$225.00
00554-Moranville	3.10	Jamie Serb	\$750	–	–	review client's docs for mediation	\$2,325.00
00554-Moranville	0.90	Jamie Serb	\$750	–	–	internal discussion re discovery and informal disco needed	\$675.00
00554-Moranville	0.30	Jamie Serb	\$750	–	–	review em exchange re mediation	\$225.00
00554-Moranville	0.10	Jamie Serb	\$750	–	–	discuss case updates with associate	\$75.00
00554-Moranville	0.60	Jamie Serb	\$750	–	–	internal discussion re class member contact	\$450.00
00554-Moranville	0.10	Jamie Serb	\$750	–	–	review em re cmc continuance and stay	\$75.00
00554-Moranville	0.20	Jamie Serb	\$750	–	–	review em exchange re settlement agreement	\$150.00
00554-Moranville	0.40	Jamie Serb	\$750	–	–	review revised order	\$300.00

00554-Moranville	0.20	Jamie Serb	\$750	–	–	review em exchange re joint report	\$150.00
00554-Moranville	0.60	Jamie Serb	\$750	–	–	review em exchange and edits to SA	\$450.00
00554-Moranville	0.10	Jamie Serb	\$750	–	–	discuss status of motion with associate	\$75.00
00554-Moranville	0.30	Jamie Serb	\$750	–	–	review em exchange re signatures on SA	\$225.00
00554-Moranville	0.10	Jamie Serb	\$750	–	–	review joint report	\$75.00
00554-Moranville	2.40	Jamie Serb	\$750	–	–	review case file and reassign to associate	\$1,800.00
00554-Moranville	0.10	Jamie Serb	\$750	–	–	review em exchange re client declarations	\$75.00
00554-Moranville	0.30	Jamie Serb	\$750	–	–	em exchange re informal discovery neesd	\$225.00
00554-Moranville	0.50	Jamie Serb	\$750	–	–	review em exchange re outstanding data	\$375.00

00554-Moranville	0.10	Jamie Serb	\$750	–	–	review em re edit to joint report	\$75.00
00554-Moranville	0.20	Jamie Serb	\$750	–	–	review em exchange re MFA	\$150.00
00554-Moranville	0.40	Jamie Serb	\$750	–	–	review em exchange re executed SA	\$300.00
00554-Moranville	0.20	Jamie Serb	\$750	–	–	discuss data with associate	\$150.00
00554-Moranville	0.40	Jamie Serb	\$750	–	–	review em exchange re mediation	\$300.00
00554-Moranville	0.60	Jamie Serb	\$750	–	–	internal discussion re data	\$450.00
00554-Moranville	0.10	Jamie Serb	\$750	–	–	discuss obtaining handbooks with associate	\$75.00
00554-Moranville	0.60	Jamie Serb	\$750	–	–	em with associate re next steps	\$450.00
00554-Moranville	0.20	Jamie Serb	\$750	–	–	review em exchange re final SA	\$150.00

00554-Moranville	1.70	Jamie Serb	\$750	–	–	review settlement agreement and discuss with associate	\$1,275.00
00554-Moranville	0.20	Jamie Serb	\$750	–	–	discuss expert with associate	\$150.00
00554-Moranville	0.30	Jamie Serb	\$750	–	–	review draft MOU	\$225.00
00554-Moranville	0.20	Jamie Serb	\$750	–	–	review em exchange re admin bids	\$150.00
00554-Moranville	0.20	Jamie Serb	\$750	–	–	em exchange re joint report	\$150.00
00554-Moranville	0.10	Jamie Serb	\$750	–	–	internal discussion re hearing date/calendar	\$75.00
00554-Moranville	0.20	Jamie Serb	\$750	–	–	em exchange re JPA	\$150.00
00554-Moranville	0.10	Jamie Serb	\$750	–	–	internal discussion re production of docs for mediation	\$75.00
00554-Moranville	2.90	Jamie Serb	\$750	–	–	review MPA filing	\$2,175.00

00554-Moranville	2.90	Jamie Serb	\$750	–	–	review case file	\$2,175.00
00554-Moranville	0.40	Jamie Serb	\$750	–	–	review em exchange re MOU edits	\$300.00
00554-Moranville	0.30	Jamie Serb	\$750	–	–	review em re production deadlines for docs and data	\$225.00
00554-Moranville	0.30	Jamie Serb	\$750	–	–	review final MOU	\$225.00
00554-Moranville	0.20	Jamie Serb	\$750	–	–	discussion w/associate re case status	\$150.00
00554-Moranville	0.10	Jamie Serb	\$750	–	–	review joint report	\$75.00
00554-Moranville	0.40	Jamie Serb	\$750	–	–	review em exchange re client's intake and docs	\$300.00
00554-Moranville	5.10	Blake Jones	\$900	–	–	Review client personnel file provided by Def, case file	\$4,590.00
00554-Moranville	2.50	Blake Jones	\$900	–	–	Review and revise class complaint	\$2,250.00

00554-Moranville	0.50	Blake Jones	\$900	–	–	Review Def's answer to consolidated complaint	\$450.00
00554-Moranville	2.50	Blake Jones	\$900	–	–	Review and revise first amended class complaint	\$2,250.00
00554-Moranville	0.50	Blake Jones	\$900	–	–	Emails with Defendant's counsel and Defendants' General counsel re discussing claims, related ...	\$450.00
00554-Moranville	2.50	Blake Jones	\$900	–	–	Review and revise consolidated complaint	\$2,250.00
00554-Moranville	0.50	Blake Jones	\$900	–	–	Call with co counsel re mediation	\$450.00
00554-Moranville	0.80	Blake Jones	\$900	–	–	Several emails with associate re Mx to Strike	\$720.00
00554-Moranville	2.40	Blake Jones	\$900	–	–	Review and analyze related cases and identify unique claims/theories	\$2,160.00
00554-Moranville	0.50	Blake Jones	\$900	–	–	Call with associate re stipulation to consolidate	\$450.00
00554-Moranville	0.30	Blake Jones	\$900	–	–	Emails with OC re introduction and scheduling call	\$270.00

00554-Moranville	0.80	Blake Jones	\$900	–	–	Review and revise JPA with co counsel	\$720.00
00554-Moranville	0.50	Blake Jones	\$900	–	–	Review and revise notice of deposition of Def	\$450.00
00554-Moranville	2.50	Blake Jones	\$900	–	–	Review and revise formal discovery propounded to Def	\$2,250.00
00554-Moranville	0.80	Blake Jones	\$900	–	–	Call with OC re Mx to Strike	\$720.00
00554-Moranville	0.80	Blake Jones	\$900	–	–	Call with associate and co counsel re demurrer	\$720.00
00554-Moranville	0.50	Blake Jones	\$900	–	–	Call with associate to discuss case	\$450.00
00554-Moranville	0.50	Blake Jones	\$900	–	–	Several emails with co counsel re demurrer	\$450.00
00554-Moranville	0.60	Blake Jones	\$900	–	–	Review and revise informal discovery letter to Def	\$540.00
00554-Moranville	0.80	Blake Jones	\$900	–	–	Review letter from OC re Mx to Strike	\$720.00

00554-Moranville	0.60	Blake Jones	\$900	–	–	Call with OC re mediation and propose mediators	\$540.00
00554-Moranville	0.50	Blake Jones	\$900	–	–	Call with co counsel re consolidation	\$450.00
00554-Moranville	0.60	Blake Jones	\$900	–	–	Call with co counsel re JPA	\$540.00
00554-Moranville	0.50	Blake Jones	\$900	–	–	Call with associate re Mx to Strike	\$450.00
00554-Moranville	0.90	Blake Jones	\$900	–	–	Review and revise stipulation to consolidate	\$810.00
00554-Moranville	0.50	Branden Hami	\$650	–	Other	Review internal e-mail communications re case signup, potential preexisting cases, filing/calendaring of PAGA ...	\$325.00
00554-Moranville	0.70	Branden Hami	\$650	–	Other	Reviewed Deft's prelit records production	\$455.00
00554-Moranville	0.40	Sepideh Ardes	\$700	–	Case Management	call with client	\$280.00
00554-Moranville	0.80	Sepideh Ardes	\$700	–	–	meeting with MP re case strategy	\$560.00

00554-Moranville	0.40	Sepideh Ardes	\$700	–	–	call with client re update	\$280.00
00554-Moranville	0.50	Sepideh Ardes	\$700	–	–	call with client re update	\$350.00
00554-Moranville	3.20	Zach Crosner	\$800	–	–	Perform intake, follow up intake and review	\$2,560.00
00554-Moranville	2.20	Zach Crosner	\$800	–	–	Review potentially pre-existing cases and case size	\$1,760.00
00554-Moranville	1.80	Zach Crosner	\$800	–	–	Research of potential claims and discussion thereto	\$1,440.00
00554-Moranville	1.40	Zach Crosner	\$800	–	–	Review of entities/finalize/revise records request	\$1,120.00
00554-Moranville	3.10	Zach Crosner	\$800	–	–	Review of employment records produced/discussion thereto	\$2,480.00
00554-Moranville	0.50	Zach Crosner	\$800	–	–	Notice of representation by opposing counsel and follow up correspondences	\$400.00
00554-Moranville	1.70	Zach Crosner	\$800	–	–	Internal strategy session/discussions regarding the claims	\$1,360.00

00554-Moranville	1.20	Zach Crosner	\$800	–	–	Further research difference between entities - multitude of providence entities and how they relate to St. Jud...	\$960.00
00554-Moranville	0.50	Zach Crosner	\$800	–	–	Client status update	\$400.00
00554-Moranville	2.10	Zach Crosner	\$800	–	–	Further review of potentially overlapping cases and further discussion of relevant entities	\$1,680.00
00554-Moranville	3.80	Zach Crosner	\$800	–	–	Class complaint review/revise	\$3,040.00
00554-Moranville	0.80	Zach Crosner	\$800	–	–	Review/discussion re. judge assignment	\$640.00
00554-Moranville	0.40	Zach Crosner	\$800	–	–	Client status update	\$320.00
00554-Moranville	1.10	Zach Crosner	\$800	–	–	Review/research/discussion of potential OT/AWS claims	\$880.00
00554-Moranville	3.10	Zach Crosner	\$800	–	–	PAGA Notice review/revisions/finalize for submission	\$2,480.00
00554-Moranville	0.80	Zach Crosner	\$800	–	–	Research & discussion re. another potentially overlapping case	\$640.00

00554-Moranville	0.40	Zach Crosner	\$800	–	–	Review/finalize service of process	\$320.00
00554-Moranville	1.00	Zach Crosner	\$800	–	–	401k benefits potential claim research/discussion w/ client	\$800.00
00554-Moranville	2.10	Zach Crosner	\$800	–	–	Review & discussion re. notice of related cases/case review	\$1,680.00
00554-Moranville	2.50	Zach Crosner	\$800	–	–	Discussion re. OC's letter of 203 claims, review/revisions for FAC	\$2,000.00
00554-Moranville	0.30	Zach Crosner	\$800	–	–	Review & discussion re. notice of reassignment of judge	\$240.00
00554-Moranville	1.40	Zach Crosner	\$800	–	–	Review/revisions of SAC	\$1,120.00
00554-Moranville	0.30	Zach Crosner	\$800	–	–	Review joint status conf statement	\$240.00
00554-Moranville	1.80	Zach Crosner	\$800	–	–	Discussions w/ co-counsel re. consolidating complaint, JPA, etc.	\$1,440.00
00554-Moranville	0.40	Zach Crosner	\$800	–	–	Review of draft stip to consolidate	\$320.00

00554-Moranville	2.10	Zach Crosner	\$800	–	–	Review of consolidated/FAC amended consolidated complaint	\$1,680.00
00554-Moranville	1.10	Zach Crosner	\$800	–	–	Review of another potentially overlapping case	\$880.00
00554-Moranville	2.70	Zach Crosner	\$800	–	–	Review/discussion re. P's written discovery	\$2,160.00
00554-Moranville	1.10	Zach Crosner	\$800	–	–	Review def's answer to the complaint	\$880.00
00554-Moranville	2.50	Zach Crosner	\$800	–	–	Review/discussion re. def's discovery requests & depo notices	\$2,000.00
00554-Moranville	0.70	Zach Crosner	\$800	–	–	Review def's depo notice response	\$560.00
00554-Moranville	1.50	Zach Crosner	\$800	–	–	Mediation discussions - i.e. proposal, scheduling, mediators, etc.	\$1,200.00
00554-Moranville	0.20	Zach Crosner	\$800	–	–	Review status conference statement	\$160.00
00554-Moranville	0.50	Zach Crosner	\$800	–	–	Client update	\$400.00

00554-Moranville	1.20	Zach Crosner	\$800	–	–	Review/revise informal mediation requests	\$960.00
00554-Moranville	4.70	Zach Crosner	\$800	–	–	Review/discussion re. mediation production of documents	\$3,760.00
00554-Moranville	1.30	Zach Crosner	\$800	–	–	Review/discussion re. mediation production of data	\$1,040.00
00554-Moranville	1.90	Zach Crosner	\$800	–	–	Review of further mediation production	\$1,520.00
00554-Moranville	2.60	Zach Crosner	\$800	–	–	Review/discussion re. mediation brief	\$2,080.00
00554-Moranville	3.50	Zach Crosner	\$800	–	–	Review/discussions re. damages analysis	\$2,800.00
00554-Moranville	4.40	Zach Crosner	\$800	–	–	Preparation for mediation	\$3,520.00
00554-Moranville	9.50	Zach Crosner	\$800	–	–	Mediation	\$7,600.00
00554-Moranville	0.80	Zach Crosner	\$800	–	–	Review/revise MOU	\$640.00

00554-Moranville	2.60	Zach Crosner	\$800	–	–	Review/discussion re. settlement agreement & exhibits	\$2,080.00
00554-Moranville	3.40	Zach Crosner	\$800	–	–	Review of motion for preliminary approval docs	\$2,720.00
00554-Moranville	0.70	Zach Crosner	\$800	–	–	Review/discussion re. def's opposition to motion for preliminary approval as to rep awards & reply brief	\$560.00
00554-Moranville	2.10	Zach Crosner	\$800	–	–	Review of court's tentative ruling, discussion re. revisions	\$1,680.00
00554-Moranville	0.60	Zach Crosner	\$800	–	–	Client update	\$480.00
00554-Moranville	1.60	Zach Crosner	\$800	–	–	Review of administrator's work, notice mailings, prelim calculations, timeline, etc.	\$1,280.00
00554-Moranville	0.60	Zach Crosner	\$800	–	–	Class member discussion re. check	\$480.00
00554-Moranville	3.20	Zach Crosner	\$800	–	–	Review of final approval docs	\$2,560.00