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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA

JOSE VALENCIA, an individual,
BRANDON JEROUE, an individual, and on
behalf of all others similarly situated,

Plaintiffs,

vs.

SENTINEL TRANSPORTION, LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 22CV00951

[Assigned for all purposes to the Hon. James F.
Rigali, Department SM Dept. 2]

**DECLARATION OF KRISTEN M. AGNEW IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: June 25, 2024

Time: 8:30 a.m.

Dept.: SM Dept. 2

Action Filed: April 29, 2022

Trial Date: None Set

1 I, Kristen M. Agnew, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and am with the law firm Diversity Law Group, P.C., counsel of record for Plaintiffs
4 Jose Valencia and Brandon Jeroue (“Class Representatives” or “Plaintiffs”). I have personal
5 knowledge of the facts set forth below and if called to testify I could and would do so
6 competently.

7 **FAIRNESS OF THE SETTLEMENT**

8 2. The Joint Stipulation of Class Action Settlement (“Settlement Agreement” or
9 “Agreement”) was the product of negotiations between highly able and experienced attorneys on
10 both sides who possessed the relevant data and extensive legal research which they had carefully
11 analyzed. The Parties engaged in arm’s length negotiations at mediation with a highly
12 experienced and known wage-and-hour mediator, Francis J. Ortman III.

13 3. Additionally, Class Counsel conducted significant investigation in this case,
14 including formal and informal discovery and exchanges of information regarding data for the
15 putative class, as well as documents and information pertaining to Defendant Sentinel
16 Transportation, LLC’s (“Defendant”) payroll policies and practices.

17 4. In connection with mediation, Defendant provided numerous data points
18 regarding the scope of the class and range of potential damages and penalties at issue, such as:
19 (1) the number of non-exempt drivers; (2) the number of employees paid “base pay” wages; (3)
20 the number of alleged aggrieved employees; (4) the number of pay periods worked by non-
21 exempt drivers; (5) the number of pay periods worked by alleged aggrieved employees; (6) the
22 average hourly rate of pay for non-exempt drivers; (7) the number of wage statements reflecting
23 the payment of “base pay” wages; (8) revised wage statements that include the hours and hourly
24 rate for “base pay” wages; and (9) wage statements reflecting Defendant’s change in policies
25 regarding its payroll schedule.

26 5. Using the data provided by Defendant, I performed a comprehensive damages
27 analysis. I also investigated the applicable law as applied to the facts discovered regarding the
28 alleged claims of the putative class and potential defenses thereto. Thus, I entered mediation with

1 a clear understanding of Defendant's maximum exposure.

2 6. Based on the class data provided by Defendant, I estimate that the total exposure
3 for the class and PAGA claims amount to \$5,443,782.40. However, this figure assumes that the
4 Court would award of multiple PAGA penalties for different Labor Code violations in the same
5 pay period (*i.e.* stack PAGA penalties). In the alternative, if the Court applies a single \$100
6 PAGA penalty per pay period, the realistic exposure on the class and PAGA claims totals
7 \$3,518,482.40. Without the stacking of PAGA penalties, the Gross Settlement Fund is
8 approximately 16.05% of the total estimated liability.

9 **ATTORNEY QUALIFICATIONS**

10 7. My qualifications are as follows: I was the 2003 recipient of the Spelman
11 Presidential Scholarship to Emory University School of Law. During law school, I was a summer
12 associate at the law firm of Sonnenschein, Nath and Rosenthal, and clerked with the Atlanta
13 office of the Equal Employment Opportunity Commission. I received my J.D. from Emory
14 University in 2006 and was admitted to the California Bar in December 2006. Following law
15 school, I was an associate at Sonnenschein from September 2006 to May 2009.

16 8. Since 2009, my primary area of practice has been employment litigation. I have
17 practiced law at two preeminent employment defense firms. From May 2009 to June 2011, I was
18 an associate at Ogletree, Deakins, Nash, Smoak & Stewart, P.C. I was also an associate, and then
19 senior associate, in the labor and employment practice group of Seyfarth Shaw, LLP from June
20 2011 to May 2016. At both Ogletree and Seyfarth, I represented a wide array of fortune 500
21 companies in employment litigation in both state and federal courts, as well as before
22 government agencies, including the California Department of Labor. My practice included the
23 defense of single plaintiff and multi-plaintiff lawsuits involving claims under the California Fair
24 Employment and Housing Act, the California Labor Code and the Fair Labor Standards Act. I
25 also handled a number of wage and hour class actions.

26 9. While at Ogletree and Seyfarth, I served as the lead associate on a number of
27 wage and hour class actions, including *Martha Cardenas v. Gold's Gym*, Los Angeles County
28

1 Superior Court Case No. BC445112; *Nathaniel Werner v. Crown Equipment Corporation*, Los
2 Angeles County Superior Court Case No. BC439428; *Christopher Williams v. Allstate Insurance*
3 *Co.*, Los Angeles County Superior Court Case No. BC382577; *Hwang v. Caltech*, Los Angeles
4 County Superior Court Case No. BC464894; *Melissa Roberts v. Zale Delaware, Inc.*, Los
5 Angeles Superior Court Case No. BC523610; *Michael Oliver v. Konica Minolta Business*
6 *Solutions U.S.A., Inc.*, Santa Clara County Superior Court Case No. 114-CV-263183; *Tessa*
7 *Hodge v. Zale Delaware, Inc., d/b/a Piercing Pagoda*, San Bernardino Superior Court Case No
8 CIVVS1301632; *Warren v. Paychex, Inc.*, N.D. Cal. Case No. 3:10-cv-02006; *Tapia v. Zale*
9 *Delaware Inc. et al*, S.D. Cal. Case No. 3:13-cv-01565; and *Benjamin Burgess et al v. Tesoro*
10 *Refining and Marketing Company et al*, C.D. Cal. Case No. 2:10-cv-05870.

11 10. I also second chaired two jury trials where I represented the prevailing defendant.
12 Both cases involved employees who brought claims against their former employers pursuant to
13 the Fair Employment & Housing Act. The cases are: *Jeff Cowell v. Eaton Aerospace LLC et al*,
14 Los Angeles County Superior Court Case No. BC401543; and *Richard Gulden v. Pratt &*
15 *Whitney Rocketdyne Inc. et al.*, Los Angeles County Superior Court Case No. BC468909.

16 11. In June 2016, I joined Diversity Law Group, P.C. where I spend most of my time
17 handling employment cases. I primarily represent employees.

18 12. I have been approved as class counsel in numerous wage/hour class actions that
19 have been granted class certification and final approval, including: *Antonio Becerra-Mata v. PSC*
20 *Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-00030; *Kosal*
21 *So v. Owens-Brockway Glass Container, Inc.*, Los Angeles County Superior Court Case No.
22 BC608609; *Sarah Rodriguez v. Manpower, Inc.*, Santa Clara County Superior Court Case No. 1-
23 16-CV-294904; *Shannon Sanchez v. American Para Professional Systems, Inc.*, Santa Clara
24 County Superior Court Case No. 17CV306751; *Foaad Hanna v. Equinix, LLC*, Santa Clara
25 County Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles
26 County Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville Community*
27 *Hospital*, Santa Cruz Superior Court Case No. 18CV00191; *Michael Randolph v. Pacific Racing*
28

1 *Association*, Alameda County Superior Court Case No. RG18908139; *Cody Wirbick v. Sundt*
2 *Construction, Inc.*, U.S. District Court for the Eastern District of California Case No. 2:19-cv-
3 02067-MCE-CKD; *Jose Vasquez Ruiz v. Perdue Foods, LLC*, Sonoma County Superior Court
4 Case No. SCV 264649; *Delmer Wood III v. Reeve Trucking Company Inc.*, San Joaquin
5 Superior Court Case No. STK-CV-UOE-2018-0004414; *Eric Chavez v. Converse, Inc.*, U.S.
6 District Court for the Northern District of California Case No. 15-cv-03746-NC; *Jharett Siron v.*
7 *Raypak, Inc.*, Ventura County Superior Court Case No. 56-2019-00527959-CU-OE-VTA;
8 *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara Superior Court
9 Case No. 19CV345211; and *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court
10 Case No. 19CV341582.

11 13. I have served as lead trial counsel on class and representative PAGA bench trials,
12 in which the plaintiffs were the prevailing parties.

13 **ATTORNEYS' FEES AND LITIGATION COSTS**

14 14. To date, I have incurred approximately 130.60 hours in connection with the
15 litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have
16 incurred to date. I expect to spend an additional three hours finalizing this settlement, including
17 preparing for the approval hearing, conferring with Settlement Administrator regarding
18 distribution of payment to Settlement Class Members, and fielding phone calls regarding
19 inquiries about the Settlement.

20 15. As of January 1, 2024, my hourly rate in class and representative actions
21 increased to \$800. Accordingly, the total lodestar for my hours will be approximately \$106,880
22 (133.60 hours x \$800). I was recently approved at an hourly rate of \$800 in the matters of *Robert*
23 *Jordan v. Mondelez Global, LLC*, San Bernardino County Superior Court Case No.
24 CIVSB2202758; and *Alexis Tristan v. American Homes 4 Rent, L.P.*, Los Angeles County
25 Superior Court Case No. 23STCV17006. I was also previously approved at an hourly rate of
26 \$700.00 in a number of matters, including: *Foaad Hanna v. Equinix, LLC*, Santa Clara County
27 Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County
28

1 Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville Community Hospital*,
2 Santa Cruz Superior Court Case No. 18CV00191; *Michael Randolph v. Pacific Racing*
3 *Association*, Alameda County Superior Court Case No. RG18908139; *Gutierrez v. Spa Havens*,
4 *LP*, San Diego Superior Court Case No. 37-2019-00057065-CU-OE-NC; *Cruzado v. Ontario T*,
5 *Inc.*, San Bernardino Superior Court Case No. CIVSB2027249; *Ray v. C&W Facility Services*,
6 *Inc.*, San Bernardino Superior Court Case No. CIVSB2101321; *Alvarez v. Forterra Building*
7 *Products*, San Diego Superior Court Case No. 37-2020-00018179-CU-OE-CTL; *Dunn v.*
8 *Universal Plant Services of California, Inc.*, Solano County Superior Court Case No.
9 FCS056134, *Pulido v. Georgia-Pacific Corrugated III LLC*, Fresno Superior Court Case No.
10 18CECG00265; *In re: FPI Management Wage and Hour Cases*, Los Angeles Superior Court
11 Case No. JCCP5050; *Delgado v. Kloeckner Metals Corporation*, Los Angeles Superior Court
12 Case No. 20STCV22503; *Jackson v. Samuel, Son & Co. (USA) Inc.*, Riverside County Superior
13 Court Case No. CVRI2101679, *Blanton v. Communications Test Design, Inc.*, San Joaquin
14 Superior Court Case No. STK-CV-UOE-2021-0005136; *Diaz v. Acuity Brands Lighting, Inc.*,
15 San Bernardino Superior Court Case No. CIVDS2015583; *Flournoy v. Partners Personnel –*
16 *Management Services, LLC*, Riverside County Superior Court Case No. CVRI2102372; *Idian v.*
17 *VHSD ES INC.*, San Diego Superior Court Case No. 37-2019-00018927-CU-OE-CTL; *Miller v.*
18 *Stanbridge University*, Orange County Superior Court Case No. 30-2021-01206298-CU-OE-
19 CXC; *Romano v. SSA Terminals, LLC*, Los Angeles Superior Court Case No. 20STCV29048;
20 *Wise v. Le Petite Academy, Inc.*, San Joaquin Superior Court Case No., STK-CV-UOE-2021-
21 10561; *Chambers v. SOMACIS, Inc.*, San Diego Superior Court Case No. 37-2021-00033445-
22 CU-OE-CTL; *Johnson v. FS Palo Alto Employment, Inc.*, Santa Clara Superior Court Case No.
23 21CV389927; *Rodriguez v. U.S. Bank National Association*, Los Angeles Superior Court Case
24 No. BC617356; *Moss v. Sares Regis Operating Company, L.P.*, Orange County Superior Court
25 Case No. 30-2021-01201041-CU-OE-CXC; and *Rodriguez v. City National Bank*, Los Angeles
26 Superior Court Case No. 20STCV29761.
27

28 16. At the time the Parties negotiated the Settlement Agreement, I did not have a final

1 tally of the litigation costs incurred to date. As such, the Parties included a maximum amount
2 that could be attributed to costs under the settlement. To date, Diversity Law Group has incurred
3 costs in the amount of \$16,754.98 for litigation related expenses. Attached hereto as **Exhibit B** is
4 a true and correct copy of the cost report.

5 **NOTICE TO LWDA**

6 17. On May 31, 2024, my office uploaded the Court's Order Granting Preliminary
7 Approval to the LWDA's website. Attached hereto as **Exhibit C** is a true and correct copy of the
8 confirmation.

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

11 Executed on this 31st day of May 2024, at Los Angeles, California.

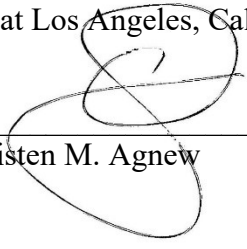
12 
13 _____
14 Kristen M. Agnew
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EXHIBIT A

Valencia v. Sentinel Transportation
Time and Task Chart for Kristen Agnew

Hours	Description of Work
4.70	Review intake notes; conduct legal research re potential theories of liability and prepare memorandum to file re same; confer with co-counsel re evaluation of claims and likely defenses.
2.30	Draft PAGA notices and class action complaint; confer with co-counsel re same.
8.50	Review Defendant's notice of removal of class action; confer with co-counsel re grounds to remand; conduct legal research re same.
1.00	Draft representative action complaint in the related PAGA Action.
7.10	Meet and confer with defense counsel re motion to remand class action; draft motion to remand; confer with co-counsel re same.
4.20	Review Defendant's opposition to motion to remand class action; conduct legal research re same; confer with co-counsel re same.
2.60	Meet and confer with defense counsel re stipulating to remand class action; draft stipulation re same.
1.10	Draft first amended complaint ("FAC") and stipulation to file FAC; meet and confer with defense counsel re same.
1.80	Meet and confer with defense counsel re July 11, 2022 case management conference in class action; draft joint report.
3.50	Meet and confer with defense counsel re coordination or consolidation of class action and PAGA action; conduct legal research re procedure to consolidate actions; confer with co-counsel re same.
2.30	Draft special interrogatories (set one) and requests for production of documents (set one); confer with co-counsel re same.
1.60	Meet and confer with defense counsel re September 12, 2022 case management conference in PAGA action; draft joint report.
3.90	Review Defendant's responses and objection to special interrogatories (set one) and requests for production of documents (set one); draft meet and confer correspondence re discovery responses; confer with co-counsel re same.
.60	Meet and confer with defense counsel re November 7, 2022 case management conference in PAGA action; draft joint report.
2.50	Continued meet and confer discussions with defense counsel re Defendant's responses to special interrogatories (set one) and requests for production of documents (set one); confer with counsel re same.
3.20	Review Defendant's document production; prepare analysis of clients' time and payroll records.

Hours	Description of Work
7.40	Continued meet and confer discussions with defense counsel re factual basis for reimbursement claim and overtime exemption; conduct legal research re overtime exemption; confer with co-counsel re same.
.90	Meet and confer with defense counsel re parameters of potential mediation and potential mediators; confer with co-counsel re same.
3.20	Prepare analysis re risk of summary judgment and likelihood of class certification.
1.00	Meet and confer with defense counsel re March 6, 2023 case management conference in class and PAGA actions; review and revise stipulation to continue case management conference.
2.40	Draft informal discovery requests for putative class data for mediation; confer with co-counsel re same.
1.10	Meet and confer with defense counsel re May 8, 2023 case management conference in class and PAGA actions; draft joint report and request to continue case management conference.
.50	Meet and confer with defense counsel re status and scope of mediation data.
2.70	Review and analyze putative class data for mediation; prepare exposure analysis; confer with co-counsel re same.
21.90	Draft mediation statement; legal research re same; attend all day mediation.
.20	Review and approve proposed notice of settlement.
1.30	Appear at November 6, 2023 case management conference in class and PAGA action; confer with defense counsel re same.
8.20	Draft joint stipulation of class and representative action settlement ("settlement agreement"); confer with defense counsel and co-counsel re revisions to settlement agreement; review and incorporate proposed revisions to settlement agreement.
1.10	Draft proposed second amended class and representative action complaint ("SAC"); meet and confer with defense counsel re SAC; draft stipulation to file SAC; review and incorporate revisions to SAC and stipulation.
11.10	Draft motion for preliminary approval and supporting declarations; confer with co-counsel re same; review and incorporate defense counsel's revisions.
.20	Review and approve stipulation to continue February 26, 2024 case management conference.
5.90	Review court's tentative ruling re motion for preliminary approval; confer with defense counsel re same; conduct legal research re allocation to PAGA; prepare for an appear at hearing on preliminary approval; confer with co-counsel re same.
2.40	Confer with settlement administrator regarding distribution of notice of class action settlement; confer with defense counsel re preliminary calculations;

Hours	Description of Work
	review and finalize notice; analyze and review reports from class administrator; confer with class members re terms of settlement.
8.20	Draft and revise motion for final approval and supporting declarations; conduct legal research re same.
130.60	<u>TOTAL HOURS</u>

EXHIBIT B

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DIVERSITY LAW GROUP
Slip Listing

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Selection Criteria

Slip Classification Open
Client (hand select) Include: Valencia, Jose v. Sentinel CA
Slip.Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
70468	EXP	Mariana Becerra	1	75.00	75.00
1/20/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
LWDA					
70890	EXP	Olympia	2	0.25	0.50
1/31/2022		Photocopies			
WIP		Valencia, Jose v. Sentinel CA			
Photocopies					
70891	EXP	Olympia	1	7.33	7.33
1/31/2022		Postage			
WIP		Valencia, Jose v. Sentinel CA			
Postage					
71082	EXP	Olympia	1	1483.20	1483.20
3/8/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Complaint					
71367	EXP	Erika Mejia	1	73.10	73.10
3/10/2022		Atty Service			
WIP		Valencia, Jose v. Sentinel CA			
Attorney Service - Complaint Service					
71200	EXP	Olympia	1	5.15	5.15
3/15/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Notice of CMC					
71484	EXP	Olympia	7	0.25	1.75
3/31/2022		Photocopies			
WIP		Valencia, Jose v. Sentinel CA			
Photocopies					
71485	EXP	Olympia	1	6.66	6.66
3/31/2022		Postage			
WIP		Valencia, Jose v. Sentinel CA			
Postage					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
71306	EXP	Erika Mejia	1	5.15	5.15
4/5/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - POS of Summons					
71610	EXP	Erika Mejia	1	1483.20	1483.20
4/29/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Complaint					
71848	EXP	Erika Mejia	1	5.15	5.15
5/17/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - 170.6					
72158	EXP	Erika Mejia	1	73.10	73.10
5/18/2022		Atty Service			
WIP		Valencia, Jose v. Sentinel CA			
Attorney Service - Complaint Service					
71895	EXP	Erika Mejia	1	5.15	5.15
5/25/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - POS of Summons					
72022	EXP	Erika Mejia	1	5.15	5.15
6/3/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - FAC					
72097	EXP	Olympia	1	5.15	5.15
6/7/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Notice of CMC					
72118	EXP	Erika Mejia	1	25.75	25.75
6/8/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Stip to file FAC					
72193	EXP	Erika Mejia	1	25.75	25.75
6/14/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Stip to file FAC					
72198	EXP	Erika Mejia	1	5.15	5.15
6/14/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - FAC					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
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Description		Reference	Variance		
72208	EXP	Erika Mejia	1	25.75	25.75
6/16/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Stip to file FAC					
72256	EXP	Olympia	1	5.15	5.15
6/24/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Joint CMS					
72548	EXP	Olympia	1	0.53	0.53
6/30/2022		Postage			
WIP		Valencia, Jose v. Sentinel CA			
Postage					
72547	EXP	Olympia	5	0.25	1.25
6/30/2022		Photocopies			
WIP		Valencia, Jose v. Sentinel CA			
Photocopies					
72998	EXP	Erika Mejia	1	5.15	5.15
9/14/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Notice of Related Case					
72999	EXP	Erika Mejia	1	5.15	5.15
9/14/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Notice of Related Case					
73732	EXP	Olympia	1	5.15	5.15
12/7/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Notice of Entry re Related Case					
Order					
73733	EXP	Olympia	1	5.15	5.15
12/7/2022		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Notice of Entry of Order re					
Related Cases					
74948	EXP	Erika Mejia	1	5.15	5.15
4/21/2023		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - CMS					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
74949	EXP	Erika Mejia	1	5.15	5.15
4/21/2023		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - CMS					
74955	EXP	Erika Mejia	1	25.75	25.75
4/24/2023		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Joint CMS & Request to Cont					
74956	EXP	Erika Mejia	1	25.75	25.75
4/24/2023		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Joint CMS & Request to Cont					
75554	EXP	Olympia	1	13000.00	13000.00
7/3/2023		Arbitrators			
WIP		Valencia, Jose v. Sentinel CA			
Ortman Mediation					
76870	EXP	Kristen Agnew	1	44.66	44.66
10/3/2023		Meals			
WIP		Valencia, Jose v. Sentinel CA			
Meal					
76552	EXP	Olympia	1	5.15	5.15
11/8/2023		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Notice of MPA					
77368	EXP	Erika Mejia	1	25.75	25.75
1/31/2024		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Stip to file SAC					
77382	EXP	Erika Mejia	1	97.85	97.85
2/1/2024		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - MPA					
77383	EXP	Erika Mejia	1	25.75	25.75
2/1/2024		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Stip to file SAC					
77423	EXP	Erika Mejia	1	5.15	5.15
2/6/2024		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Prop Order re Stip					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
77511	EXP	Erika Mejia	1	25.75	25.75
2/8/2024		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Stip to file SAC					
77611	EXP	Olympia	1	5.15	5.15
2/27/2024		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Notice of Consolidation					
77612	EXP	Olympia	1	5.15	5.15
2/27/2024		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Notice of Settlement					
77613	EXP	Olympia	1	5.15	5.15
2/27/2024		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Supp Decl of KA					
77768	EXP	Olympia	1	5.15	5.15
3/14/2024		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Odyssey - Notice of Change of Attorney					
78343	EXP	Kristen Agnew	1	97.85	97.85
5/28/2024		Court fees			
WIP		Valencia, Jose v. Sentinel CA			
Est MFA Fees					
Grand Total					
			Billable	0.00	16754.98
			Unbillable	0.00	0.00
			Total	0.00	16754.98

EXHIBIT C