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17 Attorneys for Plaintiff
18 Noe Ponce Ceja

19 SUPERIOR COURT OF CALIFORNIA
20 COUNTY OF SAN DIEGO

21 NOE PONCE CEJA, individually and on behalf
22 of all others similarly situated,

23 Plaintiff,

24 v.

25 VENTURE DYNAMICS ENTERPRISES,
26 INC., and DOES 1 to 100,

27 Defendants.

28 Case No. 37-2022-00004908-CU-OE-CTL
)
) SUPPLEMENTAL DECLARATION OF
) ADAM ROSE IN SUPPORT OF MOTION
) FOR FINAL APPROVAL
)
) Date: March 15, 2024
) Time: 1:30 p.m.
) Dept: C-69
)
)
)

29 I, Adam Rose, declare the following:

- 30 1. I am one of the attorneys representing the plaintiff in this matter. I have personal knowledge
31 of the facts in this declaration, and if called on to testify about the facts I would competently do so.
32 2. A true and correct copy of the total hours spent by Frontier Law Center on this case are also
33 delineated and contained in the attached spreadsheet showing a lodestar of \$166,725.
34 3. Also attached is a true and correct copy of the costs incurred by Frontier Law Center.

4. My billing rate for this case is \$800 per hour. Since I graduated from University of San Francisco Law School in 1998, I have settled upwards of 250 individual employment law cases, and I have handled the following class actions from start to finish: *Ramirez v. Arevalo Landscaping*, Los Angeles Superior Court case number BC3971109; *Friedrich v. La Vaquita Corp.*, Los Angeles Superior Court case number BC564432; *Carvalho v. Staff Pro*, Alameda County Superior Court case number RG16812554; *Hart v. Marriott International, Inc.*, United States District Court case number 8:17-cv-2021-JVS; *Cole v. Saucey, Inc.*, Los Angeles Superior Court case number BC707895; *Rowe v. Laura Geller Beauty, LLC*, United States Bankruptcy Court case number 1:18-bk-14102-MEW (New York); *Rowe v. Ulta Salon, Beauty, and Cosmetics, LLC*, Sacramento Superior Court case number 34-2019-00267231, *Luna et al. v. Triple Canopy, Inc.*, Santa Clara Superior Court case number 19CV345169, *Smith v. Budget Rent A Car System, Inc.*, United States District Court case number 2:19-cv-4720-SVW, *Shrum v. Sacramento Elite Patrol, Inc.*, Sacramento Superior Court case number 34-2019-002767231, *Morris v. Blue Mountain Enterprises, LLC*, Solano County Superior Court case number FCS035858, *Lopez v. Mac Arthur Co.*, Riverside County Superior Court case number RIC1905043, *Diaz v. Marriott International, Inc.*, San Diego Superior Court case number 37-2019-00044740, *Castellanos et al. v. Southwest Patrol, Inc.*, San Diego Superior Court case number 37-2020-00024905, *Inacio v. Land O' Lakes*, Merced Superior Court case number 19CV-04520, *GSG Wage and Hour Cases*, San Diego Superior Court case number JCCP5055, *Marroquin v. Teleferic Barcelona PA, LLC*, Santa Clara Superior Court case number 21CV388821, *Gonzalez, et al. v. Golden Gate Bell*, Contra Costa Superior Court case number MSC21-00956, *Sunshine Retirement Wage and Hour Cases*, Sacramento Superior Court case number JCCP5247, and *Navarro Garcia v. Widdicombe Enterprises, Inc.*, Orange County case number 30-2021-01235358.

5. I actively participated in and helped finalize class action settlements in the following: *Arya Security Services Cases*, Orange County Superior Court case number JCCP4991, *Allen v. Caine & Weiner*, Los Angeles Superior Court case number BC465806, *Terry v. SHAC, LLC dba Sapphire*, Eighth Judicial District of Nevada case number A-09-602800-C, *Carter v. Fantasy Castle*, Los Angeles Superior Court case number BC433666, *Blunt v. Valley Ball Cabaret*, Los Angeles

1 Superior Court case number BC380265, *Lawrenz, et al. v. Blacktalon Enterprises, Inc., et al.*,
2 Sacramento Superior Court case number 34-2019-00267748, *Stricklin, et al. v. First Alarm Security*
3 *& Patrol, Inc.*, Santa Clara Superior Court case number 18CV323753, and *Massey v. Hummel +*
4 *Mann*, Santa Barbara Court case number 21CV02985.

5 6. I helped to obtain class certification for *Van Bebber v. Dignity Health*, United States
6 District Court case number 1:19-cv-00264, and I obtained FLSA certification and finalized a
7 settlement involving over 300 opt-ins in *Desio v. Russell Road Food & Beverage*, United States
8 District Court case number 2:15-1440-GMN (Nevada).

9 7. I have worked to finalize the following PAGA-only settlements: *McAfee v. Chief Protective*
10 *Services*, Riverside County Superior Court case number RIC1721984, *Hall v. Pirch, Inc.*, San
11 Diego Superior Court case number 37-2016-00036606, *Green v. American Guard*, Los Angeles
12 Superior Court case number BC688437, *Hernandez v. Contemporary Services Corp.*, Los Angeles
13 Superior Court case number BC684206, *McNeal v. Platinum Security Services*, Los Angeles
14 Superior Court case number 19STCV05709, *Cruz v. Holder Construction Group, LLC*, Santa Clara
15 Superior Court case number 19CV341862, *Nunes v. Westmont Living*, San Luis Obispo Superior
16 Court case number 19CV-0935, *Gibson v. Swift Transportation Co.*, United States District Court
17 case number 5:20-cv-00318-ODW, *Katabyan v. Awesome Doughnut*, Los Angeles Superior Court
18 case number 20STCV19903, *Ayoub v. Harry Winston, Inc.*, United States District Court case
19 number 4:21-cv-01599-JST, *Williams v. St. Joseph Personal Care Services, LLC*, Orange County
20 Superior Court case number 30-2020-01134268-CU-OE-CXC, and *Bullock v. Atria Management*
21 *Company, LLC*, Nevada County Superior Court case number CU22-086285, and *Valdivieso v.*
22 *United Auto Group*, Los Angeles Superior Court case number 23GDCV00191.

23 8. I have handled appellate matters in the Second, Third, Fourth, Fifth, and Sixth District
24 Courts of Appeal and the Ninth Circuit Court of Appeals, including employment law cases, and I
25 am admitted to the Supreme Court of the United States.

26 9. The Laffey Matrix actually provides for an hourly rate for me as high as \$1,057.

27 10. Based on the above and the arguments in the motion, I strongly believe the settlement is
28 fair, reasonable, and adequate, and I respectfully request the court to grant the motion for final
approval and motion for attorney fees and costs.

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

3 Date: February 22, 2024

Adam Rose

Adam Rose

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Time, Fees and Expenses

for Noe Ponce - Employment Claim - Venture Dynamics Enterprises, Inc

Time and Fee entries

Date	Activity	Description	Staff	Duration	Rate	Billable ?	Write Off?	Status	Total
2/22/2024		Help to finalize and file motion for final approval paperwork	Adam Rose	4.80	\$800.00	True	No	-	\$3,840.00
2/21/2024		Update client	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
2/21/2024		Further edit motion for final approval and client declaration	Adam Rose	3.40	\$800.00	True	No	-	\$2,720.00
2/20/2024		1 email sent/reviewed regarding Ponce v. Venture Dynamics Enterprises - Plaintiff's Third Amended Complaint	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
2/19/2024		Review third amended complaint	Adam Rose	1.10	\$800.00	True	No	-	\$880.00
2/19/2024		Review administrator's declaration	Adam Rose	1.20	\$800.00	True	No	-	\$960.00
2/15/2024		Initial review of motion for final approval	Adam Rose	3.10	\$800.00	True	No	-	\$2,480.00
2/13/2024		Review administration status report	Adam Rose	1.00	\$800.00	True	No	-	\$800.00
2/6/2024		Review administration status report	Adam Rose	1.00	\$800.00	True	No	-	\$800.00
2/6/2024		Update client	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
1/31/2024		Review administration status report	Adam Rose	1.00	\$800.00	True	No	-	\$800.00
1/23/2024		Review administration status report	Adam Rose	1.00	\$800.00	True	No	-	\$800.00
1/23/2024		1 email sent/reviewed regarding Report	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
1/18/2024		Matter admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
1/10/2024		Review administration status report	Adam Rose	1.00	\$800.00	True	No	-	\$800.00
1/2/2024		Review administration status report	Adam Rose	1.00	\$800.00	True	No	-	\$800.00
12/26/2023		Review administration status report	Adam Rose	1.00	\$800.00	True	No	-	\$800.00
12/20/2023		Review administration status report	Adam Rose	1.00	\$800.00	True	No	-	\$800.00

12/18/2023	Final Settlement Agreement (00670392xAF06A) reviewed	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
12/11/2023	Memo edited - Settlement admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
12/11/2023	Memo reviewed - Settlement admin	Collette Navasartian	0.10	\$225.00	True	No	-	\$22.50
12/8/2023	Confirm data sent to administrator	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
11/17/2023	Matter admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
11/17/2023	Memo created - Settlement admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
11/2/2023	Final Settlement Agreement (00670392xAF06A) reviewed	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
10/13/2023	Review notice of entry of order	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
10/10/2023	Communications with administrator re: status	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
10/6/2023	Update client	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
10/6/2023	Review tentative ruling	Adam Rose	0.60	\$800.00	True	No	-	\$480.00
10/6/2023	Janelle covering - Motion for Preliminary Approval of Class Action and PAGA Settlement (C-69) attended	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
10/6/2023	Janelle covering -CASE MANAGEMENT CONF (CMC) (C-69 Kathrine Bacal) attended	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
10/6/2023	Janelle covering - Motion for Preliminary Approval of Class Action and PAGA Settlement (C-69) attended	Manny Starr	0.50	\$650.00	True	No	-	\$325.00
10/6/2023	Final Settlement Agreement (00670392xAF06A) reviewed	Manny Starr	1.00	\$650.00	True	No	-	\$650.00
10/6/2023	Janelle covering - Motion for Preliminary Approval of Class Action and PAGA Settlement (C-69) attended	Collette Navasartian	0.50	\$225.00	True	No	-	\$112.50
9/9/2023	Settlement Details reviewed	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
8/24/2023	Confirm CMC still on calendar	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
7/31/2023	1 email sent/reviewed regarding Noe Ponce v. Venture Dynamics Enterprises, Inc	Theodore Tang	0.10	\$550.00	True	No	-	\$55.00
7/19/2023	Final Settlement Agreement (00670392xAF06A) reviewed	Theodore Tang	0.10	\$550.00	True	No	-	\$55.00
7/12/2023	Review notice of ruling	Adam Rose	0.30	\$800.00	True	No	-	\$240.00

7/12/2023	Services provided on 7/12/2023	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
7/12/2023	Services provided on 7/12/2023	Collette Navasartian	0.70	\$225.00	True	No	-	\$157.50
7/11/2023	Services provided on 7/11/2023	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
7/11/2023	Services provided on 7/11/2023	Collette Navasartian	0.10	\$225.00	True	No	-	\$22.50
7/10/2023	Services provided on 7/10/2023	Collette Navasartian	0.10	\$225.00	True	No	-	\$22.50
7/7/2023	Services provided on 7/7/2023	Collette Navasartian	0.30	\$225.00	True	No	-	\$67.50
7/5/2023	Further help with ex parte application	Adam Rose	0.90	\$800.00	True	No	-	\$720.00
6/24/2023	Research re: viability of remand	Adam Rose	2.20	\$800.00	True	No	-	\$1,760.00
6/12/2023	1 email sent/reviewed regarding Noe Ponce v. Venture Dynamics Enterprises, Inc	Theodore Tang	0.20	\$550.00	True	No	-	\$110.00
6/9/2023	Further edit ex parte application	Adam Rose	1.70	\$800.00	True	No	-	\$1,360.00
6/9/2023	Ex Parte App to Advance Hearing on MPA edited	Theodore Tang	0.60	\$550.00	True	No	-	\$330.00
6/9/2023	1 email sent/reviewed regarding Noe Ponce v. Venture Dynamics Enterprises, Inc	Theodore Tang	0.10	\$550.00	True	No	-	\$55.00
6/9/2023	Ponce Substitution reviewed	Theodore Tang	0.10	\$550.00	True	No	-	\$55.00
6/9/2023	Decl ISO Ex Parte edited	Theodore Tang	0.70	\$550.00	True	No	-	\$385.00
6/8/2023	Help with ex parte application to advance hearing	Adam Rose	2.10	\$800.00	True	No	-	\$1,680.00
6/8/2023	Services provided on 6/8/2023	Collette Navasartian	0.10	\$225.00	True	No	-	\$22.50
6/6/2023	1 email sent/reviewed regarding Noe Ponce v. Venture Dynamics Enterprises, Inc	Theodore Tang	0.10	\$550.00	True	No	-	\$55.00
6/6/2023	Ex Parte App to Advance Hearing on MPA edited	Theodore Tang	0.50	\$550.00	True	No	-	\$275.00
6/5/2023	Plaintiff's Confidential Mediation Brief (00666531xAF06A) reviewed	Theodore Tang	0.10	\$550.00	True	No	-	\$55.00
6/5/2023	Final Settlement Agreement (00670392xAF06A) reviewed	Theodore Tang	0.10	\$550.00	True	No	-	\$55.00
6/5/2023	Ex Parte App to Advance Hearing on MPA created	Theodore Tang	1.00	\$550.00	True	No	-	\$550.00
6/5/2023	STIPULATION TO REMAND TO STATE COURT -DKT 28 reviewed	Theodore Tang	0.10	\$550.00	True	No	-	\$55.00

5/31/2023	Review final version of motion for preliminary approval	Adam Rose	2.40	\$800.00	True	No	-	\$1,920.00
5/22/2023	Prepare supporting declaration for motion	Adam Rose	2.40	\$800.00	True	No	-	\$1,920.00
5/17/2023	Help prepare motion for preliminary approval	Adam Rose	4.50	\$800.00	True	No	-	\$3,600.00
5/12/2023	Obtain fully signed agreement	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
5/1/2023	Review final version of settlement agreement	Adam Rose	1.50	\$800.00	True	No	-	\$1,200.00
4/21/2023	Matter admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
4/19/2023	Matter admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
4/19/2023	Updated OC	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
4/18/2023	Review draft of settlement agreement	Adam Rose	2.30	\$800.00	True	No	-	\$1,840.00
4/13/2023	Follow up once more re: settlement	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
4/13/2023	Follow up re: draft of settlement agreement	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
4/11/2023	Settlement Details reviewed	Manny Starr	0.40	\$650.00	True	No	-	\$260.00
4/10/2023	Matter admin	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
3/29/2023	1 email sent/reviewed regarding Noe Ponce v. Venture Dynamics Enterprises, Inc	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
3/29/2023	Matter admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
3/28/2023	Follow up re: draft of settlement agreement	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
3/28/2023	Reserve hearing date	Adam Rose	0.20	\$800.00	True	No	-	\$160.00
3/28/2023	1 email sent/reviewed regarding Report	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
3/22/2023	Matter admin	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
3/22/2023	FAC (00655223xAF06A) reviewed	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
3/22/2023	Matter admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
3/22/2023	Memo edited - Call with OC re mediation	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
3/22/2023	Case Updated to San diego county	Mary Mars	0.20	\$225.00	True	No	-	\$45.00

3/21/2023	Update client	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
3/21/2023	Services provided on 3/21/2023	Adam Rose	0.10	\$800.00	True	No	-	\$80.00
3/17/2023	Edit stipulation to remand	Adam Rose	1.50	\$800.00	True	No	-	\$1,200.00
3/16/2023	Research re: stipulation to remand	Adam Rose	2.20	\$800.00	True	No	-	\$1,760.00
3/8/2023	Confirm settlement terms	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
3/8/2023	Services provided on 3/8/2023	Adam Rose	0.50	\$750.00	True	No	-	\$375.00
3/8/2023	Off-Discovery Conference attended	Manny Starr	0.50	\$550.00	True	No	-	\$275.00
3/8/2023	Settlement Details created, then reviewed	Manny Starr	0.20	\$550.00	True	No	-	\$110.00
3/8/2023	Plaintiffs Confidential Mediation Brief (0066531xAF06A) reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
3/7/2023	Further communication with clerk re: IDC	Adam Rose	0.60	\$800.00	True	No	-	\$480.00
3/6/2023	Contact clerk re: setting up IDC	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
3/3/2023	Mediation notes 1.31.23 reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
3/2/2023	Matter admin	Mary Mars	0.10	\$150.00	True	No	-	\$15.00
3/1/2023	Mediation notes 1.31.23 reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
2/28/2023	Venture Dynamics Mediation Workbook 2023-01-19 reviewed	Manny Starr	0.20	\$550.00	True	No	-	\$110.00
2/28/2023	Venture Dynamics Mediation Workbook 2023-01-19 reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
2/26/2023	Research procedure for an informal discovery conference	Adam Rose	1.10	\$800.00	True	No	-	\$880.00
2/21/2023	Analysis re: amended PAGA letter viability	Adam Rose	0.80	\$800.00	True	No	-	\$640.00
2/19/2023	Review drafts of Belaire-West notice	Adam Rose	1.20	\$800.00	True	No	-	\$960.00
2/17/2023	Email attachment reviewed - Research re Res Judicata	Manny Starr	0.20	\$550.00	True	No	-	\$110.00
2/17/2023	2 emails sent/reviewed regarding meal break liability	Manny Starr	0.20	\$550.00	True	No	-	\$110.00
2/17/2023	2 emails sent/reviewed regarding Ponce	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
2/15/2023	Review proposed amended PAGA letter	Adam Rose	0.90	\$800.00	True	No	-	\$720.00
2/13/2023	Call with defense re: progress of case	Adam Rose	0.40	\$800.00	True	No	-	\$320.00

2/9/2023		Review meet and confer letter re: discovery	Adam Rose	1.80	\$800.00	True	No	-	\$1,440.00
2/7/2023		Matter admin	Mary Mars	0.10	\$150.00	True	No	-	\$15.00
2/2/2023		Ponce v. Venture - PLT Mediation brief DRAFT v4 MS 1.24.23 reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/31/2023		Services provided on 1/31/2023	Adam Rose	7.00	\$750.00	True	No	-	\$5,250.00
1/31/2023		MEDIATION attended	Manny Starr	7.00	\$550.00	True	No	-	\$3,850.00
1/31/2023		Plaintiff's Confidential Mediation Brief (00666531xAF06A) reviewed	Manny Starr	0.50	\$550.00	True	No	-	\$275.00
1/31/2023		Mediation notes 1.31.23 created	Manny Starr	0.20	\$550.00	True	No	-	\$110.00
1/31/2023		DK 20 ORDER Setting Discovery Conference reviewed	Manny Starr	0.20	\$550.00	True	No	-	\$110.00
1/31/2023		1 email sent/reviewed regarding meal break liability	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/31/2023		ORDER SETTING DEADLINES DKT-16 reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/31/2023		Ponce - VDE-000001-1103 reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/30/2023		Monitor mediaiton	Adam Rose	6.40	\$800.00	True	No	-	\$5,120.00
1/30/2023		Further prepare for mediation, call client	Adam Rose	3.20	\$800.00	True	No	-	\$2,560.00
1/30/2023		Plaintiff's Confidential Mediation Brief (00666531xAF06A) reviewed	Manny Starr	0.30	\$550.00	True	No	-	\$165.00
1/30/2023		Ponce - Notice to Clerk and Adverse Party re Removal reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/30/2023		Prep for and attend pre-mediation call with co-counsel	Manny Starr	1.20	\$550.00	True	No	-	\$660.00
1/27/2023		E1_RetentionLetter_VentureDynamicsEnterprises created	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/24/2023		Services provided on 1/24/2023	Adam Rose	0.10	\$750.00	True	No	-	\$75.00
1/24/2023		Ponce - VDE-001021-1520 reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/24/2023		Ponce - VDE-000001-1103 reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/24/2023		VD West Coast Temp Employee Handbook - 4819-1298-4257 reviewed	Manny Starr	0.50	\$550.00	True	No	-	\$275.00
1/24/2023		Venture Dynamics Mediation Workbook 2023-01-19 reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/24/2023		Noe Ponce File reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00

1/24/2023	Ponce v. Venture - PLT Mediation brief DRAFT v4 MS 1.24.23 created, then edited	Manny Starr	1.20	\$550.00	True	No	-	\$660.00
1/24/2023	5 emails sent/reviewed regarding Ponce	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/24/2023	Research re Res Judicata created	Manny Starr	0.50	\$550.00	True	No	-	\$275.00
1/24/2023	Further research and work on mediation brief	Manny Starr	3.50	\$550.00	True	No	-	\$1,925.00
1/23/2023	VD West Coast Temp Employee Handbook - 4819-1298-4257 reviewed	Manny Starr	1.90	\$550.00	True	No	-	\$1,045.00
1/23/2023	Ponce Informal Discovery Request Letter reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/23/2023	Review mediation brief, legal research on joint employment theory	Manny Starr	4.00	\$550.00	True	No	-	\$2,200.00
1/20/2023	Edit mediation brief draft	Adam Rose	2.60	\$800.00	True	No	-	\$2,080.00
1/20/2023	Case Eval - Ponce v. Venture Dynamics reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/20/2023	5 emails sent/reviewed regarding Ponce	Manny Starr	0.20	\$550.00	True	No	-	\$110.00
1/19/2023	Review expert's analysis	Adam Rose	3.80	\$800.00	True	No	-	\$3,040.00
1/19/2023	Conference call with economics expert	Adam Rose	0.90	\$800.00	True	No	-	\$720.00
1/19/2023	Ponce - VDE-000001-1103 reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/19/2023	3 emails sent/reviewed regarding Ponce	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/19/2023	Venture Dynamics Mediation Workbook 2023-01-18 reviewed	Manny Starr	0.20	\$550.00	True	No	-	\$110.00
1/19/2023	Noe Ponce File reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/18/2023	Edit proposed MOU	Adam Rose	1.10	\$800.00	True	No	-	\$880.00
1/18/2023	Call with client to discuss payroll questions	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
1/18/2023	E1_RetentionLetter_VentureDynamicsEnterprises (00664853xAF06A) (1) created	Mary Mars	0.10	\$150.00	True	No	-	\$15.00
1/17/2023	Review administration status report	Adam Rose	1.00	\$800.00	True	No	-	\$800.00
1/12/2023	Prepare subsequent motion to extend deadline for mediation data	Adam Rose	1.40	\$800.00	True	No	-	\$1,120.00
1/6/2023	1 email sent/reviewed regarding Noe Ponce v. Venture Dynamics Enterprises, Inc	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/5/2023	Review further produced data	Adam Rose	2.30	\$800.00	True	No	-	\$1,840.00

1/5/2023	Services provided on 1/5/2023	Adam Rose	0.10	\$750.00	True	No	-	\$75.00
1/5/2023	1 email sent/reviewed regarding Noe Ponce v. Venture Dynamics Enterprises, Inc	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/5/2023	password reviewed	Taylor May	0.10	\$150.00	True	No	-	\$15.00
1/4/2023	Services provided on 1/4/2023	Adam Rose	0.50	\$750.00	True	No	-	\$375.00
12/29/2022	Review next set of produced data	Adam Rose	3.60	\$800.00	True	No	-	\$2,880.00
12/28/2022	Follow up regarding remaining data for mediation	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
12/15/2022	Ponce - VDE-000021-520 created	Taylor May	0.10	\$150.00	True	No	-	\$15.00
12/15/2022	ORDER GRANTING JOINT MOTION TO EXTEND TIME-DKT-23 reviewed	Taylor May	0.10	\$150.00	True	No	-	\$15.00
12/15/2022	Ponce Informal Discovery Request Letter reviewed	Taylor May	0.10	\$150.00	True	No	-	\$15.00
12/9/2022	File joint motion to continue deadlines	Adam Rose	1.20	\$800.00	True	No	-	\$960.00
12/7/2022	Prepare joint motion to continue deadline for data	Adam Rose	1.50	\$800.00	True	No	-	\$1,200.00
12/7/2022	Follow up with defense re: moving deadline to produce data	Adam Rose	0.90	\$800.00	True	No	-	\$720.00
12/1/2022	All Colonnas Wage Statements_Redacted_VDE-000001-20 reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
12/1/2022	Noe Ponce File reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
12/1/2022	3 emails sent/reviewed regarding Ponce - status of production	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
12/1/2022	1 email sent/reviewed regarding Noe Ponce v. Venture Dynamics Enterprises, Inc	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
11/30/2022	Engagement dialog with economics expert	Adam Rose	1.10	\$800.00	True	No	-	\$880.00
11/29/2022	2 emails sent/reviewed regarding Ponce - status of production	Manny Starr	0.30	\$550.00	True	No	-	\$165.00
11/29/2022	Matter admin	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
11/29/2022	1 email sent/reviewed regarding Noe Ponce v. Venture Dynamics Enterprises, Inc	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
11/29/2022	4 emails sent/reviewed regarding Ponce - Colonnas documents	Manny Starr	0.20	\$550.00	True	No	-	\$110.00
11/23/2022	Noe Ponce File reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00

11/11/2022	Review first set of produced data	Adam Rose	2.60	\$800.00	True	No	-	\$2,080.00
11/11/2022	1 email sent/reviewed regarding Ponce v. Venture Dynamics - 25% sampling spreadsheet (NASSCO)	Manny Starr	0.30	\$550.00	True	No	-	\$165.00
11/9/2022	DISCOVERY CONFERENCE attended	Manny Starr	1.00	\$550.00	True	No	-	\$550.00
11/9/2022	Noe Ponce File reviewed	Manny Starr	0.20	\$550.00	True	No	-	\$110.00
11/9/2022	Memo edited - Call with OC re mediation	Taylor May	0.10	\$150.00	True	No	-	\$15.00
11/7/2022	Correspondence with clerk re: mediation data	Adam Rose	1.00	\$800.00	True	No	-	\$800.00
11/7/2022	1 email sent/reviewed regarding [EXT] RE: Ponce v. Venture Dynamics case No. 3:22-cv-00918-L-AHG - Request for Status Conference	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
11/7/2022	DK 20 ORDER Setting Discovery Conference created	Taylor May	0.10	\$150.00	True	No	-	\$15.00
11/7/2022	3 emails sent/reviewed regarding [EXT] RE: Ponce v. Venture Dynamics case No. 3:22-cv-00918-L-AHG - Request for Status Conference	Taylor May	0.20	\$150.00	True	No	-	\$30.00
11/4/2022	Memo created, then edited - Call with OC re mediation	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
10/26/2022	Ponce PAGA reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
10/26/2022	Noe Ponce File reviewed	Manny Starr	0.20	\$550.00	True	No	-	\$110.00
10/26/2022	Partial intake 08-03-2021 Noe Ponce v. Noe Ponce v. Venture Dynamic Enterprises, Inc reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
10/26/2022	Matter admin	Taylor May	0.10	\$150.00	True	No	-	\$15.00
10/26/2022	00660279 reviewed	Taylor May	0.10	\$150.00	True	No	-	\$15.00
10/26/2022	00660267 reviewed	Taylor May	0.10	\$150.00	True	No	-	\$15.00
10/14/2022	Matter admin	Taylor May	0.10	\$150.00	True	No	-	\$15.00
10/10/2022	Review responses to discovery responses	Adam Rose	2.10	\$800.00	True	No	-	\$1,680.00
9/2/2022	Further correspondence re: mediation data	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
9/1/2022	Continue to follow up with defense for mediation data	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
8/31/2022	Correspondence re: proposed Belaire West notice	Adam Rose	0.60	\$800.00	True	No	-	\$480.00

8/31/2022	Follow up re: mediation data requests pursuant to order	Adam Rose	1.10	\$800.00	True	No	-	\$880.00
8/29/2022	Review defense initial disclosures	Adam Rose	1.30	\$800.00	True	No	-	\$1,040.00
8/26/2022	Review drafts of further discovery	Adam Rose	3.10	\$800.00	True	No	-	\$2,480.00
8/26/2022	Review notes for result from ENE	Adam Rose	1.20	\$800.00	True	No	-	\$960.00
8/20/2022	Edit initial disclosures	Adam Rose	0.80	\$800.00	True	No	-	\$640.00
8/17/2022	Begin preparing initial disclosures	Adam Rose	1.30	\$800.00	True	No	-	\$1,040.00
8/15/2022	Prepare ENE statement	Adam Rose	3.40	\$800.00	True	No	-	\$2,720.00
8/14/2022	Update client	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
8/12/2022	Further review order denying motion to continue	Adam Rose	0.70	\$800.00	True	No	-	\$560.00
8/10/2022	Review order denying motion to continue ENE	Adam Rose	0.60	\$800.00	True	No	-	\$480.00
8/9/2022	Help prepare mediation data request letter	Adam Rose	0.60	\$800.00	True	No	-	\$480.00
8/9/2022	Edit letter to client re: upcoming settlement conference	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
8/4/2022	Review answer to second amended complaint	Adam Rose	2.10	\$800.00	True	No	-	\$1,680.00
8/4/2022	Meet and confer regarding upcoming deadlines, including ENE	Adam Rose	10.00	\$800.00	True	No	-	\$8,000.00
7/29/2022	Review draft of joint report	Adam Rose	2.10	\$800.00	True	No	-	\$1,680.00
7/28/2022	Continue to attempt to set up mediation	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
7/14/2022	Review ENE procedures in detail	Adam Rose	10.00	\$800.00	True	No	-	\$8,000.00
7/14/2022	Attempt to set up mediation	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
7/13/2022	Schedule early meeting	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
7/11/2022	Review email from defense re: removal filing	Adam Rose	0.40	\$800.00	True	No	-	\$320.00
7/8/2022	Review meet and confer letter re: remand	Adam Rose	1.30	\$800.00	True	No	-	\$1,040.00
7/6/2022	Review letter to client re: ENE	Adam Rose	0.80	\$800.00	True	No	-	\$640.00
7/6/2022	Update client	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
6/29/2022	Further research re: option to remand	Adam Rose	1.40	\$800.00	True	No	-	\$1,120.00

6/23/2022	Review removal paperwork	Adam Rose	3.20	\$800.00	True	No	-	\$2,560.00
6/21/2022	Review stipulation to file the second amended complaint	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
6/16/2022	Review joint CMC statement	Adam Rose	0.60	\$800.00	True	No	-	\$480.00
5/30/2022	Continue to edit second amended complaint	Adam Rose	2.10	\$800.00	True	No	-	\$1,680.00
5/29/2022	Review draft of second amended complaint	Adam Rose	2.20	\$800.00	True	No	-	\$1,760.00
5/19/2022	Review deposition notice, first draft	Adam Rose	1.10	\$800.00	True	No	-	\$880.00
5/19/2022	Call with client re: workplace facts	Adam Rose	0.60	\$800.00	True	No	-	\$480.00
4/28/2022	Review initial set of outgoing discovery	Adam Rose	3.10	\$800.00	True	No	-	\$2,480.00
4/28/2022	Review answer to amended complaint	Adam Rose	1.80	\$800.00	True	No	-	\$1,440.00
4/14/2022	Review defense introductory email	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
4/13/2022	Research re: lack of a registered corporate agent	Adam Rose	1.50	\$800.00	True	No	-	\$1,200.00
4/6/2022	Obtain and file proof of service	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
4/6/2022	Request service update from attorney service	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
3/29/2022	Update client	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
3/24/2022	Review filed first amended complaint, send out for service	Adam Rose	1.80	\$800.00	True	No	-	\$1,440.00
2/16/2022	Obtain filed copies of complaint and related documents	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
2/8/2022	Prepare and file complaint	Adam Rose	3.30	\$800.00	True	No	-	\$2,640.00
1/25/2022	Finalize joint prosecution agreement	Adam Rose	0.30	\$800.00	True	No	-	\$240.00
1/17/2022	Finalize, upload to LWDA website, and send PAGA letter	Adam Rose	1.50	\$800.00	True	No	-	\$1,200.00
1/17/2022	Review draft of joint prosecution agreement	Adam Rose	0.70	\$800.00	True	No	-	\$560.00
1/17/2022	Prepare first draft of PAGA letter	Adam Rose	2.20	\$800.00	True	No	-	\$1,760.00
1/3/2022	Continue reviewing documents in file re: case analysis	Adam Rose	1.90	\$800.00	True	No	-	\$1,520.00
12/31/2021	Initial case analysis and research, review intake notes	Adam Rose	2.10	\$800.00	True	No	-	\$1,680.00
Total - Write offs			0.00					\$0.00

Total - Unbillable		0.00	\$0.00
Total - Billable		0.00	\$166,725.00
Total		223.10	\$166,725.00

Expense entries

Date	Activity	Description	Staff	Quantity	Price	Billable?	Write Off?	Status	Total
2/22/2024		Filing fee for complaint	Adam Rose	1	\$1,489.69	True	No	-	\$1,489.69
2/22/2024		Filing fee for proof of service	Adam Rose	1	\$12.87	True	No	-	\$12.87
3/28/2023		Financial report on defendant - paid for by LOBS	Manny Starr	1	\$350.00	True	No	-	\$350.00
2/20/2023		50% Econ One - Inv. No. 23215	Kirsten Starr	1	\$2,631.98	True	No	-	\$2,631.98
11/1/2022		Steve Rottman - Mediation Fee	Manny Starr	1	\$6,250.00	True	No	-	\$6,250.00
Total - Write offs									\$0.00
Total - Unbillable									\$0.00
Total - Billable									\$10,734.54
Total									\$10,734.54