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Attorneys for Veronica Redondo, on behalf of all Aggrieved Employees and the State of California

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

VERONICA REDONDO, on behalf of all
Aggrieved Employees and the State of
California; ANNEKA WOLFE, on behalf of
all Aggrieved Employees and the State of
California; DANIEL ENRIQUEZ, on behalf
of all Aggrieved Employees and the State of
California; LISA DAMMAN, on behalf of all
Aggrieved Employees and the State of
California; and SHERWIN MOKTARI, on
behalf of all Aggrieved Employees and the
State of California.

Plaintiff,

vs.

VERGE MOBILE CA EE, LP, a California
limited partnership; VERGE MOBILE CA
GP, LLC, a California limited liability
company; and DOES 1 through 20, inclusive;

Defendants.

Case No.: CVRI2200827

*[Assigned to Hon. Judge Harold Hopp, Dept
1, for all purposes]*

**DECLARATION OF JACOB N.
WHITEHEAD IN SUPPORT OF
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

I, Jacob N. Whitehead, declare as follows:

1. I am an attorney licensed to practice law in all courts of the State of California, as well as in the United States District Courts for the Central, Northern, Southern, and Eastern Districts of California, and in Washington, D.C. I am the founder and principal of W Employment Law, APC ("WEL"). I am over 18 years of age. I have been counsel for

1 three of the named Plaintiffs in this consolidated action, Daniel Enriquez, Lisa Damman
2 and Sherwin Muktari since October of 2023.

- 3 2. The facts set forth herein are based upon my own personal knowledge developed through
4 my representation of Plaintiffs Enriquez, Damman and Muktari, and the alleged similarly
5 situated Aggrieved Employees. If called upon as a witness, I would and could
6 competently testify to those matters contained in this declaration based upon my handling
7 and participation in this matter.
- 8 3. I make this Declaration in support of Plaintiffs' concurrently filed Motion for Approval
9 of PAGA Settlement and the terms set forth in the PAGA Settlement and Release of
10 Claims (the "Settlement Agreement"). If called upon as a witness, I would and could
11 competently testify to those matters contained in this Declaration based upon my handling
12 and participation in this matter.
- 13 4. As further discussed herein, it is my belief that the proposed Settlement Agreement is fair,
14 adequate, and reasonable and in the best interest of all of the Plaintiffs in this action and
15 the alleged Aggrieved Employees.
- 16 5. Plaintiffs and the alleged Aggrieved Employees are either currently employed or were
17 formerly employed by the Defendants within the State of California during the relevant
18 PAGA period. In this action the Plaintiffs have asserted a claim for civil penalties under
19 the Private Attorneys General Act of 2004, for various alleged Labor Code violations and
20 violations of the applicable Industrial Wage Commission Wage Order No. 1, that occurred
21 during the relevant statutory time period, including inter alia, that Plaintiffs and the alleged
22 Aggrieved Employees were not paid all wages due, including minimum wages, overtime
23 wages; were not provided complaint rest and meal breaks; failure to be paid wages for
24 every hour worked during each pay period throughout he stated PAGA period; failed to
25 maintain accurate employment records, that Plaintiffs and the alleged Aggrieved
26 Employees were not reimbursed for work related expenses for necessary utilization of
27 their personal cell phones; failed to provide a day of rest; were not provided with complete
28

1 and accurate wage statements, and as to such Aggrieved Employees who separated from
2 Defendant's employment during the PAGA period, were not timely paid all wages due
3 upon termination.

- 4 6. Initially I conducted a thorough investigation into the factual and legal issues implicated
5 by my clients' claims and contentions and based on my findings caused to be filed a
6 PAGA notice on February 9, 2024.
- 7 7. On or about February 26, 2025, the parties participated in a global mediation and with the
8 assistance of mediator, Kevin Barnes, Esq., arrived at the settlement of the three now-
9 consolidated actions (respectively, the *Redondo Action*, the *Wolfe Action* and the *Enriquez*
10 *Action*) and collectively reduced the terms to a written Memorandum of Understanding
11 ("MOU") on March 7, 2025.
- 12 8. For purposes of the proposed PAGA settlement, the parties sought approval for and
13 consolidated the three actions and filed the operative FAC filed by Veronica Redondo on
14 November 6, 2025, collectively alleging all of the factual and legal allegations in the
15 related actions, and adding violations of Labor Code Sections 551, 552, 553, 1174(d) and
16 1198.5.
- 17 9. The mediation and settlement negotiations were conducted at arms'-length and were at
18 all times robust, yet professional and non-collusive. Examination of data and documents
19 informally produced by the Defendant, support the conclusion that the proposed
20 settlement is fair and reasonable.
- 21 10. For many of the reasons set forth in the concurrently filed Motion for Approval of the
22 PAGA Settlement, I believe the proposed PAGA Settlement represents a fair and
23 equitable result of the case, bearing in mind both the risks and benefits of potential further
24 litigation.
- 25 11. The proposed total Gross Settlement Amount ("GSA") is Nine Hundred and Fifty
26 Thousand Dollars (\$950,000.00) and subject to the Court's approval, shall be allocated
27 as follows: \$850,000 to the PAGA Settlement and \$100,000 to the Individual
28

1 Settlement Agreements. The PAGA Settlement will be used to pay Individual PAGA
2 Payments, the LWDA PAGA Payment, Plaintiffs' Counsel Fees Payment, Plaintiffs'
3 Counsel Litigation Expenses Payment, and the Administration Expenses Payment.

4 12. The Individual PAGA Payment shall be each PAGA member's pro rata share of twenty-
5 five percent (25 %) of the PAGA penalties, based on the number of PAGA Pay Periods
6 each such individual PAGA member worked during the PAGA Period.

7 13. Individual Settlement Payments equal to a total amount of One Hundred Thousand
8 Dollars (\$100,000.00) are to paid from the GSA, to be allocated in five individual
9 settlement amounts equal to \$20,000 each, for each of the five named Plaintiffs, in the
10 consolidated action before deduction of attorney's fees (i.e., \$13,333.33 gross to each of
11 the five named Plaintiffs totaling \$66,666.65, after deduction of attorney's fees and
12 before taxes and withholdings). The individual settlements shall be memorialized in
13 five separate individual Settlement Agreements, which shall be contingent upon the
14 Court's granting the Approval motion for the proposed PAGA Settlement Agreement.

15 14. From the GSA, the Parties allocated as the Eight Hundred and Fifty Thousand Dollars
16 (\$850,000.00) of the GSA for the PAGA Settlement.

17 15. Plaintiffs request court approval of Plaintiffs' counsel's attorneys' fees in an amount up
18 to thirty-three and one third percent one-third (33.33 %) of the total settlement estimated
19 at \$316,666.67 (subject to the Escalator Clause¹ set forth in Paragraph 8 of the
20 Settlement Agreement) and allocated 70 percent to Lauby, Mankin & Lauby, LLP; 18
21 percent to Lavi & Ebrahimian, LLP and 12 % to W Employment Law, APC; and
22 Plaintiffs' Counsels' actual Litigation Expenses not to exceed \$40,000.00, according to
23 proof.
24
25

26 ¹ Based on its records, Defendants estimate that the PAGA Members collectively worked 29,387
27 PAGA Pay Periods during the PAGA Period. The Parties agree that, should the total number of
28 PAGA Pay Periods in the PAGA Period exceed 32,326 (which is 10% more than Defendants'
estimation), then the Gross Settlement Amount shall increase by \$28.92 (\$850,000 divided by
29,387) for each additional PAGA Pay Period above 32,326.

1 16. The proposed settlement also seeks approval of a Service Enhancement Award to each
2 of the five named plaintiffs in the amount of Five Thousand Dollars (\$5,000) each
3 (\$25,000.00 total) in exchange for their full general release with a Civil Code § 1542
4 waiver and settlement administrator fees in an amount not to exceed Ten Thousand
5 Eight Hundred and Fifty-Four Dollars (\$10,854.00) subject to the approval of the Court.

6 QUALIFICATION, EXPERIENCE AND EXPERTISE

7 17. W EMPLOYMENT LAW is a highly-regarded firm in the field of wage-and-hour and
8 employment litigation in Southern California. My practice is devoted to representing
9 employees in complex class and representative actions under the Private Attorneys
10 General Act of 2004 (“PAGA”) and the California Labor Code. We have repeatedly
11 been approved as class and PAGA counsel in courts across California State and Federal
12 Courts.

13 18. I have been and am currently lead counsel representing hundreds of Plaintiffs and Class
14 Members in multiple class and/or PAGA representative actions, both settled and
15 pending, in state and federal courts. The following is a non-exhaustive list of Class
16 and/or Representative actions my firm has formerly or is currently litigating and are
17 representative of many of the successful outcomes my firm has accomplished: *David*
18 *Gardner et al. v. Flair Event Models, Inc. et al.*, a misclassification, wage and hour class
19 action settled in U.S. District Court, Central District of California, Case No. 2:16-CV-
20 04371GW(GJSx); *Joseph Montague et al. v. Global Connections to Employment, Inc.*, a
21 class and PAGA representative action pending before San Diego County Superior Court,
22 Case No. 37-2022-00004601-CU-OE-CTL (currently pending Settlement approval);
23 *Scott Stewart, et al. v. Planet Home Lending, LLC*, involving wage and hour claims of
24 current and former mortgage loan originators in the Superior Court of the State of
25 California, County of Orange – Civil Complex, Case No. 30-2018-00972671-CU-OE-
26 CJC, with court settlement approval of attorney hourly rates ranging from \$450 for
27 associate counsel to \$900 for senior litigation counsel; *Mitchell McKinnon et al. v.*
28 *Peloton Interactive, Inc. et al.*, class and collective action that settled before the U.S.

1 District Court, Central District of California, Case No. 2:22-cv-03368-MWF(Ex);
2 *Weiss/Rowland/Gomez/Mcelhannon et al. v. CarMax Auto Superstores West, et al.*, a
3 coordinated wage and hour class action that settled for \$6,518,000.00 before the Placer
4 County Superior Court, Case No. S-CV-0036383, with approval for attorney hourly
5 rates ranging from \$450 for associate counsel to \$900 for senior litigation counsel;
6 *Dupre v. Microvention, Inc. dba Microvention Terumo*, pending before Orange County
7 Superior Court, Case No. 30-2023-01315361-CU-OE-NJC; *MOREL v. HNTB*
8 *Corporation*, a class and PAGA action currently pending before U.S. District Court,
9 Southern District of California, Case No. 3:22-cv-00408-AJB-AHG; *Pellegrino v. CVS*
10 *Pharmacy, Inc. et al.*, a PAGA action currently pending before Merced County Superior
11 Court, Case No. 22CV-03434; *Tessa M. Jennings v. Skygroup Investments, LLC; et al.*,
12 a Class and PAGA action before the San Bernardino County Superior Court, Case No.
13 CIVSB2222518 (final Settlement Approval pending); *Clint Allison v. American Honda*
14 *Motor Co., Inc.*, a FEHA disability discrimination/ wrongful termination action, settled
15 in Los Angeles County Superior Court, Case No. 23STCV04523; *Nikolay Popov et al. v.*
16 *ABC Phones of North Carolina, Inc.* a PAGA representative action before Orange
17 County Superior Court, Case No. 30-202-01147407-CU-OE-CXC, with court settlement
18 approval for attorney hourly rates ranging from \$450 for associate counsel to \$900 for
19 senior litigation counsel; *Justin Dada et al. v. Cybercoders, Inc.*, Case No. 8:18-cv-
20 01023-JVS-JDE, wage and hour class action settled in U.S. District Court, Central
21 District of California, with court approval of a \$1.7 million class settlement and
22 \$566,666 in attorneys' fees; *Ashante Williams v. Best Buy Co., Inc. et al*, a PAGA
23 representative action, pending before Orange County Superior Court, Case No. 30-2021-
24 01194588-CU-OE-CXC; *Andrew Saad et. al. v. Greenlink Financial, LLC*, a PAGA
25 representative action settled in Orange County Superior Court - Civil Complex, Case
26 No. 30-2018-01021704-CU-OE-CXC; *Lillia Hupp et al. v. Arthur J. Gallagher Service*
27 *Company, et al.*, a wage and hour class and PAGA representative action settled in
28 Orange County Superior Court, Case No. 30-2020-01145295-CU-OE-CXC, with court

1 settlement approval for attorney hourly rates ranging from \$450 for associate counsel to
2 \$900 for senior litigation counsel; *Trevion Sherman et al. v Amazon.com, Service, Inc.*, a
3 wage and hour Class Action, U.S. District Court, Central District, Case No. 8:19-cv-
4 1329-KES; *Andrew Impey et. al. v Parsons Transportation Group, Inc.*, a PAGA
5 representative action currently pending before San Bernardino Superior Court, Case No.
6 CIVSB-2102000; *Brooklyn Harmon et al. v. Doubletree Management, LLC*, a wage and
7 hour class action settled in Santa Barbara Superior Court, Case No. 18CV05027; *Fareh*
8 *Zoberi, et al. v. Fitness Alliance, LLC dba EOS Fitness, et al.*, a PAGA representative
9 action settled in San Bernardino County Superior Court, Case No. CIVDSS2010622;
10 *David LeKhac v. Walgreens Specialty Pharmacy, LLC*, a PAGA representative action
11 settled in Orange County Superior Court, Case No. 30-2020-01143222-CU-OE-CXC;
12 *Tobin Bell, et al. v Benihana International, Inc. et al.*, a PAGA representative action
13 settled in San Diego County Superior Court, Case No. 30-2020-00036597-CU-OE-
14 CXC; *Alfreda Lewis v. Saks South Coast Leasehold, LLC et al.*, a wage and hour Class
15 Action, settled in Orange County Superior Court, Case No. 30-2020-011431164-CU-
16 OE-CXC; *James Herb v. Finney's Funk Zone, LP*, a PAGA representative action before
17 settled in Santa Barbara County Superior Court, Case No. 21CV02120; *Daniel Kelchner*
18 *v. Jobot, LLC*, a wage and hour class action settled in Orange County Superior Court,
19 Case No. 30-2020-01161693-CU-OE-CXC; *Wendy Norris et al. v. PIH Health Inc., et*
20 *al.*, a PAGA representative action settled in Los Angeles County Superior Court, Case
21 No. 19STCV35423; *Abel Cachola et al. v. CVS Health Corporation et al.* a wage and
22 hour Class Action, settled in U.S. District Court, Eastern District of California, Case No.
23 1:19-at-534; *Mehran Kharazi v. LA Depositions, Inc.*, a wage and hour misclassification
24 class and representative PAGA action settled in Los Angeles County Superior Court,
25 Case No. 21 STSV0401; *Jennifer Montano et al. v. Forever 21, Inc. et al.*, discharged by
26 the United States Bankruptcy Court for the District of Delaware (Case No. 19-12122
27 (KG), involving wage and hour claims; *Sarah Wilkey et al. v. PortNewport, Inc. et al.*, a
28 wage and hour class action settled in Orange County Superior Court, Case No. 30-2019-

01070051-CU-OE-CXC; *Ruiz et al. v. International Fitness, LLC*, a wage and hour class action currently pending before Los Angeles County Superior Court, Case No. 23VECVO5059; *Deatherage v. Stifel, Nicolaus & Company, Incorporated, et al.*, a wage and hour class and PAGA representative action currently pending before Orange County Superior Court, Complex Civil, Case No. 30-2023-01344151-CU-OE-CXC; *Reiss v. Johnson Controls, Inc.*, a class and PAGA representative action pending before U.S. District Court, Central District of California, Case No. 8:24-cv-01080 DOC(DFMx) (settlement approval pending); *Dougherty v. Active Apparel Group (AMERICA), LLC*, a PAGA representative action currently pending before Los Angeles County Superior Court, Case No. 24STCV28418 (settlement approval pending); *Jeremiah Johnson v. Apple, Inc.*, a wage and hour class action currently pending before Santa Clara County Superior Court, Case No. 24CV450382; *Gavin Gonzales v. Vensure Employer Services, Inc.*, a class and PAGA representative Action currently pending before Los Angeles County Superior Court, Case No. 24STCV2319; *Ali Malik v. Wells Fargo Bank, N.A.*, a PAGA Representative Action pending before San Mateo County Superior Court, Case No. 24-CIV-05603; and *Kaufmann et al. v. DoorDash, Inc. et al*, a class and PAGA representative action pending before San Mateo County Superior Court, Case No. 24-CIV-03688 (settlement approval pending).

19. The Parties in this action are represented by experienced attorneys with specialized knowledge of class actions, PAGA representative actions and employment law.

20. Considered through the recognitional lenses of all risks, uncertainties and further delays occasioned by further litigation, the present proposed PAGA Settlement is a fair and reasonable compromise and will provide immediate and meaningful relief to Plaintiffs and the alleged Aggrieved PAGA members right away.

21. Defendants have at all times vigorously disputed and continue to dispute all of Plaintiffs' claims. The settlement negotiations were hard fought.

22. Based on review of Defendants written policies and the data produced, it was apparent that not every single alleged aggrieved employee missed every single rest break and not

1 every single aggrieved employee missed every single meal break each and every pay
2 period during the relevant PAGA liability period. Thus, not every single alleged
3 aggrieved employee suffered a violation each and every pay period. In addition, certain
4 disparities between the records and Plaintiffs' testimonial recollection played a large role
5 in the settlement negotiation and were given additional consideration why the
6 compromised settlement reached is a fair and reasonable settlement.

7 23. Further, in order to recover any PAGA penalties at trial, Plaintiffs would have to prove
8 each of the underlying violations, and would need to prove each suffered a violation for
9 each pay period the employee worked with regard to the alleged labor code violations.

10 24. Defendants could also argue that no penalties prior to the PAGA notification should be
11 awarded because the violations were not intentional, and at least one Court has so ruled.
12 These defenses present a risk to the PAGA claim and the potential that some or all of the
13 PAGA penalties sought may not be awarded.

14 25. Plaintiffs' original maximum theoretical damages were thus tempered by these realities
15 and were not a realistic probable outcome of the litigation because the maximum
16 theoretical damages had not taken certain of these issues into consideration. Defendants
17 contended that their wage and hour policies and practices are lawful and that all of the
18 alleged Aggrieved Employees were properly compensated. Recognizing that Lab.
19 Cod. §2699 (e)(1) permits a Court's considerable discretion to award a lesser amount
20 than the maximum civil penalties, and in consideration of the risk that at trial the actual
21 penalties awarded could be significantly less, the proposed PAGA settlement in the
22 amount of Nine Hundred and Fifty Thousand Dollars (\$950,00.00) is a fair and
23 reasonable recovery.

24 26. A settlement need not obtain 100 percent of the civil penalties sought in order to be
25 fair and reasonable. In recognizing that Lab. Cod. § 2699 (e)(1) permits a Court's
26 considerable discretion to award a lesser amount than the maximum PAGA civil
27 penalties, and in consideration of the risk that at trial the actual penalties awarded
28 could be significantly less, the proposed Gross Settlement for the PAGA claims in

1 the amount of Nine Hundred and Fifty Thousand Dollars (\$950,000.00) is a fair and
2 reasonable recovery.

3 27. If approved, the proposed PAGA Settlement will provide meaningful relief in an amount
4 certain and ascertainable that will substantially benefit the State of California and all the
5 Aggrieved Employees right away.

6 W Employment Law's Attorneys' Fees And Costs

7 28. My firm took this case on a purely contingent basis and I participated in resolving this
8 action without payment for our service or reimbursement of costs incurred, for the
9 benefit of the State of California and the Aggrieved Employees. My firm, W
10 Employment Law, APC is a comparatively small firm. Accordingly, the number of
11 cases we are able to take on at any given time is limited. Therefore, the firm has to be
12 extremely selective about the cases it does take. Additionally my firm advanced costs in
13 the amount of \$3,841.66, with any payment for litigation expenses deferred to the end
14 of the litigation and then of course, contingent on the outcome. Because there is a
15 clearly defined monetary benefit to the Aggrieved Employees, the requested attorneys'
16 fees are fair compensation for obtaining an excellent result for the Aggrieved Employees
17 and in doing so, undertaking the risk and expense and time-consumption of litigation on
18 a contingent basis.

19 29. As of the date of this Declaration, the attorney's fees W Employment Law has incurred
20 in this case to date total \$38,455.00. This is based on my firm's billable hours of
21 approximately 50.60 litigation hours for the prosecution of this action up to the filing of
22 the unopposed motion for approval of PAGA settlement, which billers include attorneys,
23 paralegals and support staff who bill their time in a detailed task specific manner on a
24 daily basis. My hourly billing rate is \$1,000, and WEL's associate counsel bill between
25 \$500 hourly. Our senior paralegal bills \$400 per hour and \$200-\$300 hourly for junior
26 paralegals and support staff. True and correct copies of my firm's lodestar billing and
27 expense summaries are attached hereto as **Exhibits A-1 and A-2**. My firm's billing
28

1 fees are based on the generally accepted laws firm and attorney compensation rates for
2 Los Angeles and Orange County.

3
4 Requested Service Enhancement Awards

5 30. In agreeing to serve as Representative Plaintiffs, each of the named plaintiffs in this
6 action, respectively, Veronica Redondo, Anneka Wolfe, Daniel Enriquez, Lisa Dmman
7 and Sherwin Moktari formally agreed to accept the responsibilities of representing the
8 interests of the similarly situated Aggrieved Employees. Plaintiffs dedicated a substantial
9 amount of time and effort in assisting with establishing the factual predicates and issues
10 that were pursued as PAGA claims in this action, answering questions, being interviewed
11 by myself and co-Plaintiffs' Counsel confirming facts and providing records and
12 documents. In choosing to become the named Representative Plaintiffs, Plaintiffs took
13 the significant risk of coming forward to represent the interests of their fellow Aggrieved
14 Employees. By bringing this lawsuit, Plaintiffs have incurred a real risk of retaliation
15 from future employers that will be present for the rest of their work life. Such conduct
16 may be considered by future employers when choosing between an applicant who has
17 never sued a prior employer versus one that has. The requested \$5,000 service payment
18 is modest and consistent with awards approved in similar PAGA matters.

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

21
22 Executed on this 1st day of December 2025, at Irvine, California.

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26 Jacob N. Whitehead, Esq.
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EXHIBIT A-1

W EMPLOYMENT LAW, APC LODESTAR SUMMARY RPT.

12/01/2025

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/26/2025		Sent Email: Fwd: Redondo/Wolfe v. Verge -- Costs/Lodestar Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.10h	\$1,000.00	-	\$100.00
11/04/2025		A104 Review/analyze L140 Document/File Management: Receive and review email thread among counsel re the proposed dates/ deadlines for the Motion for approval of PAGA settlement. Internal email reply asking if we have submitted WEL's costs to B. Mankin. Confirmation from Gladys. Confer with Jose re calendaring matters. Review fwd. copy of the final executed settlement agreement. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.70h	\$400.00	-	\$280.00
11/04/2025		A104 Review/analyze L140 Document/File Management: Receive and review email thread among counsel re the proposed dates/ deadlines for the Motion for approval of PAGA settlement. Internal email reply asking if we have submitted WEL's costs to B. Mankin. Confirmation from Gladys. Confer with Jose re calendaring matters. Review fwd. copy of the final executed settlement agreement. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.70h	\$400.00	-	\$280.00
10/28/2025		A107 (UK) Communicate (Other Party(s)/other outside lawyers)	Enriquez-10-23-01658 Daniel Enriquez v. Verge	Gladys Morcisa	0.50h	\$250.00	-	\$125.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

W EMPLOYMENT LAW, APC LODESTAR SUMMARY RPT.

12/01/2025

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		L140 Document/File Management: Collected signatures and reached out to each PLTF Re: Redondo/ Wolfe v. Verge -- Costs/Lodestar Unbilled	Mobile (LEAD) MATTER					
10/24/2025		Generated Report for Cost then forward to parties Re: Redondo/ Wolfe v. Verge -- Costs/Lodestar Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
10/24/2025		Sent Email: Internal Team EMail Fwd: Redondo/Wolfe v. Verge -- Costs/Lodestar Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.10h	\$1,000.00	-	\$100.00
10/24/2025		Sent Email: Re: Redondo/Wolfe v. Verge -- Costs/Lodestar Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
10/24/2025		Fwd: Redondo/Wolfe v. Verge -- Costs/Lodestar Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
09/03/2025		Sent Email: Internal team email, strategize, etc. Fwd: Wolfe v. Verge Mobile - Draft MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
09/03/2025		Sent Email: Response Re: Wolfe v. Verge Mobile - Draft MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
09/03/2025		Received Email: Copied on email by OPC re the MOU signatures	Enriquez-10-23-01658 Daniel Enriquez v. Verge	Debi Pugliese	0.20h	\$400.00	-	\$80.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

W EMPLOYMENT LAW, APC LODESTAR SUMMARY RPT.

12/01/2025

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		and follow up emails between JNW/ Jose re client's signature. Copied on email with WEL and client's signatures on the MOU. Unbilled	Mobile (LEAD) MATTER					
08/28/2025		Sent Email: Re: Wolfe v. Verge Mobile - Draft MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
08/28/2025		Sent Email: Convey agreement with clients via email Re: Wolfe v. Verge Mobile - Draft MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.30h	\$1,000.00	-	\$300.00
08/28/2025		A106 Communicate (with client) L190 Other Case Assessment, Development and Administration: Attorney-Client Call Re Verge Mobile Case Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.50h	\$1,000.00	-	\$500.00
08/28/2025		A106 Communicate (with client) L190 Other Case Assessment, Development and Administration: Atty Whitehead to call Ms. Lisa Damman via Google Meet Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.50h	\$1,000.00	-	\$500.00
08/27/2025		Received Email: Receive draft settlement agreement . Download and save to matter. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.10h	\$400.00	-	\$40.00
08/26/2025		A105 Communicate (in firm) JE20	Enriquez-10-23-01658	Jacob	0.20h	\$1,000.00	-	\$200.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

W EMPLOYMENT LAW, APC LODESTAR SUMMARY RPT.

12/01/2025

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Review of Other Party(s)' Statements of Case: Review Draft Fwd: Wolfe v. Verge Mobile - Draft MOU Unbilled	Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Whitehead				
08/26/2025		Sent Email: Fwd: Wolfe v. Verge Mobile - Draft MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
08/26/2025		Review Draft Fwd: Wolfe v. Verge Mobile - Draft MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
08/26/2025		Received Email: Receive email with finalized MOU to be circulated for signatures. Confer with Jose re draft MOU. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.20h	\$400.00	-	\$80.00
08/11/2025		Received Email: Copied on further email among counsel re further revisions to the draft MOU and draft consolidated FAC. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.10h	\$400.00	-	\$40.00
08/08/2025		Sent Email: Review and Respond. Fwd: Wolfe v. Verge Mobile - Draft MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
08/08/2025		Sent Email: Review and Respond. Fwd: Wolfe v. Verge Mobile - Draft MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/08/2025		Sent Email: Re: Wolfe v. Verge Mobile - Draft MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.10h	\$1,000.00	-	\$100.00
08/08/2025		Sent Email: In firm Response Re: Wolfe v. Verge Mobile - Draft MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.10h	\$1,000.00	-	\$100.00
08/08/2025		A104 Review/analyze L140 Document/File Management: Review email thread and attachments from OPC re draft MOU and draft consolidated FAC. Respond to email from Jake re the inquiry re Lisa Dammon LC 551- 553 violations. Send email reply to all counsel affirming Lisa Damman's LC 551-553 Labor Code rest day violations are correct in the drafts Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.40h	\$400.00	-	\$160.00
07/16/2025		A106 Communicate (with client) L110 Fact Investigation/ Development: Atty Whitehead to call Ms. Lisa Damman via Google Meet Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	1.00h	\$1,000.00	-	\$1,000.00
07/14/2025		A107 (UK) Communicate (Other Party(s)/other outside lawyers) L140 Document/File Management: Email from/ reply to Misty Lauby at the Lauby Law Firm, attach copy of D. Enriquez PAGA notice and the LWDA confirmation of filing.	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.30h	\$400.00	-	\$120.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Unbilled						
06/03/2025		A107 (UK) Communicate (Other Party(s)/other outside lawyers) L110 Fact Investigation/ Development: Email to opc_Case Update Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
06/02/2025		A105 Communicate (in firm) L140 Document/File Management: Confer with Yvonne in Slack re client's request for entire copy of his file. Follow up with email to JNW (copy Yvonne) re client's request in light of the pending MOU. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.40h	\$400.00	-	\$160.00
05/27/2025		A104 Review/analyze L140 Document/File Management: Receive forwarded draft MOU from JNW, with green highlighted sections. Review the draft MOU, the highlighted portions, review our file and ADR documents. Redline citation for Arias v Superior Court. Reply to JNW re highlighted information not known or locatable in our files or emails and send him the draft WEL redline. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.40h	\$400.00	-	\$160.00
05/16/2025		Sent Email: Review Draft Fwd: Wolfe v. Verge Mobile - Draft MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.30h	\$1,000.00	-	\$300.00
					50.60h		\$0.00	\$38,455.00
							0.00h	50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/16/2025		Received Email: Receive and review email thread among the parties re the terms of the MOU. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.10h	\$400.00	-	\$40.00
04/22/2025		A107 (UK) Communicate (Other Party(s)/other outside lawyers) L390 Other Discovery: Conference Meeting with Attorneys re: Redondo, Wolfe vs. Verge Mobile-MML Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.00h	\$1,000.00	-	\$0.00
04/09/2025		A105 Communicate (in firm) L140 Document/File Management: Copied on email from Yvonne re client's request for updated status on the mediator's proposed settlement. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.10h	\$400.00	-	\$40.00
04/08/2025		A105 Communicate (in firm) L120 Analysis/Strategy: Re: Wolfe v. Verge Mobile - MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.10h	\$1,000.00	-	\$100.00
04/08/2025		A104 Review/analyze L140 Document/File Management: Review file and file documents and my history notes per email inquiry from JNW. Reply to JNW re my knowledge of this case, the inclusion of all three of our clients (Daniel Enriquez, Lisa Damman and Sherwin Muktari) in the consolidated SAC and advise that I	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.40h	\$400.00	-	\$160.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		do not have a copy of the MOU. Unbilled						
04/03/2025		A104 Review/analyze L140 Document/File Management: Review Docs Fwd: Wolfe v. Verge Mobile - MOU Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.10h	\$1,000.00	-	\$100.00
04/03/2025		A104 Review/analyze L140 Document/File Management: Receive and review draft consolidated SAC and specific highlighted portions we need to complete on behalf of our clients. Reply to Jose and task with finding client related details highlighted in the draft. Review file and share PAGA confirmation and details for Daniel Enriquez with Jose for the draft SAC. Review Jose's revisions to the draft consolidated complaint. Further revise to add WEL to caption header. Send WEL rev to consolidated complaint to all counsel. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.60h	\$400.00	-	\$240.00
03/12/2025		A105 Communicate (in firm) L140 Document/File Management: Status inquiry from/ reply to Gladys M Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.20h	\$400.00	-	\$80.00
03/10/2025		A104 Review/analyze L140 Document/File Management:	Enriquez-10-23-01658 Daniel Enriquez v. Verge	Debi Pugliese	0.30h	\$400.00	-	\$120.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Receive review email thread from JNW re all parties have accepted the mediator's settlement proposal and confirmation that Lauby Mankin will take point lead on settlement approval. Confer with Gladys re same. Unbilled	Mobile (LEAD) MATTER					
03/06/2025		A107 (UK) Communicate (Other Party(s)/other outside lawyers) L190 Other Case Assessment, Development and Administration: Re: 2/26/25 Wolfe v. Verge Mobile CA EE, LP-Mediator's proposal Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
02/26/2025		Settlement Communication: Mediation Day including Prep Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	10.00h	\$1,000.00	-	\$10,000.00
02/26/2025		Hearing: Mediation Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	10.00h	\$1,000.00	-	\$10,000.00
02/20/2025		A103 Draft/revise L140 Document/ File Management: Revise Draft Re: RE Verge Mobile - Revisions to Plaintiffs' Draft Mediation Brief Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
02/20/2025		A103 Draft/revise L190 Other Case Assessment, Development and Administration: Review: RE Verge Mobile - Revisions to Plaintiffs' Draft Mediation Brief	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Unbilled								
02/20/2025		A103 Draft/revise L140 Document/ File Management: Receive further revised mediation brief. Run compare doc and share with JNW so he can review the revised brief. Copied on further revisions and comments by B. Mankin. And co- Plaintiffs' responses approving his revisions. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.40h	\$400.00	-	\$160.00
02/19/2025		A104 Review/analyze L140 Document/File Management: Per JNW instruction, forward revised draft via email to co-Plaintiffs' counsel. Review fwd emails from JN W re reminder msg from Mediator re mediation brief deadline and email from OPC re additional data yet coming Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.20h	\$400.00	-	\$80.00
02/18/2025		A103 Draft/revise L140 Document/ File Management: Receive draft mediation brief from JNW. Review client records, files in the matter and on HS. Further revise and send revisions re our clients back to JNW. .9 Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.90h	\$400.00	-	\$360.00
02/11/2025		A105 Communicate (in firm) L190 Other Case Assessment,	Enriquez-10-23-01658 Daniel Enriquez v. Verge	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Development and Administration: Dlscuss Re: Verge Mobile - Related Case Unbilled	Mobile (LEAD) MATTER					
02/11/2025		A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration: Dlscuss with the team and provided instrinctions Re: Verge Mobile - Related Case Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
02/11/2025		A102 Research L120 Analysis/ Strategy: Dlscuss Re: Verge Mobile - Related Case Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
02/11/2025		Received Email: Copied on email thread re revised JPA. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.10h	\$400.00	-	\$40.00
02/11/2025		Received Email: Copied on email thread re revised JPA. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.10h	\$400.00	-	\$40.00
02/07/2025		A105 Communicate (in firm) L140 Document/File Management: Email to/ reply from JNW re mediation/ mediation brief. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.10h	\$400.00	-	\$40.00
01/28/2025		A110 Manage data/files L140 Document/File Management: Review terms then signatories	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.10h	\$1,000.00	-	\$100.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Fwd: Verge Mobile - Related Case Unbilled						
01/28/2025		A107 Communicate (other outside counsel) L140 Document/File Management: Call with Jovahn Wiggins re Verge Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.50h	\$1,000.00	-	\$500.00
01/28/2025		A104 Review/analyze L140 Document/File Management: emails and comments from / by JNW re 2nd JPA. Review paystubs of Lisa Dammon and Daniel Enriques. Message to JNW in HS re same employer name on the paystubs. Follow up HS mention and reply question to JNW re his question re WT claims. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.40h	\$400.00	-	\$160.00
01/24/2025		A105 Communicate (in firm) L120 Analysis/Strategy: Strategize and review of files Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	1.00h	\$1,000.00	-	\$1,000.00
01/23/2025		A104 Review/analyze L140 Document/File Management: Review briefing deadline. Email JNW again and ask who is drafting mediation brief for Feb. 26, 2025 mediation. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.20h	\$400.00	-	\$80.00
01/08/2025		A105 Communicate (in firm) L140 Document/File Management: Email	Enriquez-10-23-01658 Daniel Enriquez v. Verge	Debi Pugliese	0.10h	\$300.00	-	\$30.00
					50.60h		\$0.00	\$38,455.00
							0.00h	50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		to JNW asking if Joseph Lavi's firm will be drafting the mediation brief for the Feb. 26, 2025 mediation. Unbilled	Mobile (LEAD) MATTER					
01/06/2025		A105 Communicate (in firm) L140 Document/File Management: Confer with Luke re pending mediation/ and who will be drafting the mediation brief. Review the JPA with counsel for plaintiff, Anneka Wolfe. Will follow up with JNW. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.30h	\$300.00	-	\$90.00
12/03/2024		A104 Review/analyze L140 Document/File Management: : Receive review/ save to CLIO co Plaintiff's counsel's email follow up reminder email to OPC re prior requested documents for Feb. 26, 2025 mediation. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.20h	\$300.00	-	\$60.00
10/28/2024		A103 Draft/revise JE20 Review of Other Party(s)' Statements of Case: Fwd: Wolfe v. Verge Mobile (PAGA) Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.20h	\$1,000.00	-	\$200.00
07/22/2024		A104 Review/analyze L140 Document/File Management: Review and download fully executed copy of the JPA. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.10h	\$300.00	-	\$30.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/01/2024		A103 Draft/revise L140 Document/ File Management: Emails to OPC/ reply from JNW. Revise, finalize/ sign JPA for JNW. Email to OPC for execution. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.30h	\$300.00	-	\$90.00
06/26/2024		A104 Review/analyze L140 Document/File Management: Copied on email from Jovahn Wiggins and JNW reply re JPA terms. Email copy of the filed PAGA notice and LWDA confirmation to Mr. Wiggins. Receive review draft JPA from J.Wiggins. Email to JNW re Complaint has not yet been filed for our clients. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.50h	\$300.00	-	\$150.00
05/07/2024		Phone Call: Call with attorney Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	1.00h	\$1,000.00	-	\$1,000.00
05/06/2024		A107 (UK) Communicate (Other Party(s)/other outside lawyers) L140 Document/File Management: Copied on email from Johvan Wiggins re follow up TC with JNW. Confer with Luke M. and Samantha Tadena re status of engagement of third plaintiff, Sherwin Muktari and re request for personnel records for Daniel Enriquez. Confirmation message from Samantha Tadena that Sherwin Muktari has signed the	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.60h	\$300.00	-	\$180.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h 14/18

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		contingency agreement and confirming lit-hold/request for records will be sent out tomorrow. Unbilled						
05/01/2024		A104 Review/analyze L140 Document/File Management: Receive / review Contact ownership notification for HS. Confer with S. Tadena re PC, Sherwin Muktari and details of her intake TC with Mr. Muktari, re his title, position and claims. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.40h	\$300.00	-	\$120.00
04/24/2024		A104 Review/analyze L140 Document/File Management: Review emails between JNW and Plaintiffs' counsel in Anneka Wolf related matter. Review file. (Confer with Gladys and our front end VAs re the documents and clients related to the lead matter). Review personnel records for client, Lisa Damman. Send email fyi to JNW re review of arbitration agreement/ clients' status. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	0.90h	\$300.00	-	\$270.00
04/23/2024		Phone Call: Received Call from Atty Jovahn Wiggins (Related Cases) Tuesday, April 23, 2024 Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	1.00h	\$1,000.00	-	\$1,000.00
04/08/2024		A104 Review/analyze L140	Enriquez-10-23-01658	Debi	2.30h	\$300.00	-	\$690.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Document/File Management: Conduct case/file review and review of related PAGA cases and filings. Review two related matters, filings, dockets and related case filings and create case comparison log sheet. Unbilled	Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Pugliese				
03/06/2024		A107 (UK) Communicate (Other Party(s)/other outside lawyers) L390 Other Discovery: JW to call OPC Annalyse E. Butler (RE: Daniel Enriquez v Verge Mobile) Wednesday, March 6, 2024?2:30 – 3:00pm Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	0.50h	\$1,000.00	-	\$500.00
02/08/2024		A105 Communicate (in firm) L140 Document/File Management: Further follow up with Marjolyn re certified mailing. Prepare and mail out via certified mail the PAGA notice to the Registered Agent for Defendant Verge Mobil. Sent follow up email to Marjolyn re error in her service list attached to the PAGA NTC. Discuss formatting issues. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	1.30h	\$300.00	-	\$390.00
02/08/2024		A103 Draft/revise L210 Pleadings: Drafting of PAGA Notice Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Marjolyn Maglayon	1.00h	\$200.00	-	\$200.00
02/08/2024		Filing of PAGA Notice on LWDA	Enriquez-10-23-01658	Marjolyn	0.30h	\$200.00	-	\$60.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Website Unbilled	Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Maglayon				
02/07/2024		A104 Review/analyze L140 Document/File Management: Per email from Luke, download, review and redline draft PAGA notice. Check defendant entity and registered agent's information on the CA SOS website. Send redlines and email comments to Marjolyn with attached current documents from the CA SOS. Review finalized draft – ask Marjolyn to remove redlines and comments. Review further revised final draft from Marjolyn. Approve as okay – but ask Marjolyn to confirm if okay to move forward with filing with Jake/Luke M. Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	1.10h	\$300.00	-	\$330.00
02/02/2024		A107 (UK) Communicate (Other Party(s)/other outside lawyers) L390 Other Discovery: February 2, 2024 - Attorneys Call Via Microsoft Teams l.moore@vergemobile.com Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Luke Molvarec	1.00h	\$500.00	-	\$500.00
02/02/2024		A107 (UK) Communicate (Other Party(s)/other outside lawyers) L390 Other Discovery: February 2, 2024 - Attorneys Call Via Microsoft Teams l.moore@vergemobile.com	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	1.00h	\$1,000.00	-	\$1,000.00
					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Unbilled					50.60h		\$0.00 0.00h	\$38,455.00 50.60h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/07/2025		Law Offices of Kevin T Barnes / Payment Receipt from Law Offices of Kevin T Barnes for \$3,750.00 Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jacob Whitehead	1.00	\$3,750.00	-	\$3,750.00
04/08/2024		Downloaded copy of a document on the website. Notice of Ruling re MTC arbitration and Plf's ex parte pet to file amended pleadings Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Jose Acosta	1.00	\$6.50	-	\$6.50
02/08/2024		Mailed PAGA Ntc to Registered Agent for Service for Verge Mobile Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Debi Pugliese	1.00	\$10.16	-	\$10.16
02/08/2024		PAGA Filing Fee Unbilled	Enriquez-10-23-01658 Daniel Enriquez v. Verge Mobile (LEAD) MATTER	Marjolyn Maglayon	1.00	\$75.00	-	\$75.00
							\$0.00 0.00h	\$3,841.66 0.00h