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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

Coordination Proceeding Special Title
(Rule 3.550)

TARGET WAGE AND HOUR CASES

Included Actions:

Medina et al. v. Target Corporation
San Bernardino Superior Court, Case No.
CIVSB2209126

Torres v. Target Corporation
Sacramento Superior Court, Case No. 34-
2022-00319715

Judicial Council Coordination Proceeding
Case No.: JCCP5259

Assigned for All Purposes To:
Hon. Wilfred J. Schneider, Jr.
Dept.: S-32

**DECLARATION OF JAMES R.
HAWKINS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: December 5, 2024
Time: 8:30 a.m.

Complaint Filed: September 22, 2022
Trial Date: Not Set

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Attorneys for Plaintiffs

1 I, James R. Hawkins, declare as follows:

2 1. I am an individual over the age of 18. I am a principal to the Law Firm of James
3 Hawkins, APLC. I am one of the attorneys of record for Plaintiffs. I have personal knowledge of
4 the facts set forth below, and if called to testify regarding them, I could and would do so
5 competently.

6 2. I submit this Declaration in support of Plaintiffs' Motion for Final Approval of
7 Class Action and PAGA Settlement (the "Final Approval Motion").

8 3. I have no knowledge of the existence of any conflicting interests between my firm
9 and any of its attorneys, my co-counsel's firms or any of their attorneys, and Plaintiffs or any other
10 Class Member.

11 4. As more fully detailed in my declaration of preliminary approval, the
12 accompanying declarations and attachments concurrently submitted herewith, the Settlement is a
13 fair, adequate, and reasonable compromise of the claims at issue. I endorse the Settlement as it is
14 in the best interests of Plaintiffs and the Class.

15 5. Final approval is appropriate since the Settlement will provide significant monetary
16 relief to the Settlement Class.

17 CLASS COUNSEL'S EXPERIENCE

18 6. I have a great deal of experience in wage and hour class action litigation. I have
19 been certified and approved as class counsel in many other wage/hour class actions, and I am
20 currently litigating numerous others before this Court and others. Although not an all-inclusive
21 list, over the years I have prosecuted the following class action matters as lead and/or co-lead
22 counsel, all of which implicated similar law and facts to those associated with this Action:

23 a. ***Mojica v. Compass Group, Inc., et. al.*** USDC Central District, Case No. 8:13-cv-01754.
24 Wage and Hour Class Action case seeking past wages for meal and rest break violations for
25 production workers in the State of California. Plaintiffs' Counsel preliminarily appointed as
26 Class Counsel. Case settled. Final approval granted, and funds fully disbursed.

27 b. ***Dao v. 3M Company, et al.*** USDC, CENTRAL DISTRICT, Case No. CV-08-04554.
28 Wage and Hour Class Action case seeking past wages for "off the clock," overtime and meal

1 and rest break violations for production workers in the State of California. Plaintiffs' Counsel
2 appointed as Lead Counsel. Case settled, Final Approval granted, no objections and funds fully
3 distributed.

4 c. **Ortiz v. Kmart**, USDC, CENTRAL DISTRICT, Case No. SACV 06-638 ODW. Wage
5 and Hour Class Action case seeking past wages for meal and rest period violations for retail
6 employees in the State of California. Plaintiffs' counsel appointed co-lead counsel. Case settled,
7 Final Approval granted, no objections and funds fully distributed.

8 d. **Morgan v. Aramark Campus, LLC**, USDC, CENTRAL DISTRICT, Case No. SACV08-
9 00412. Wage and Hour Class Action case seeking past wages for meal and rest period violations
10 for retail employees in the State of California. Plaintiffs' Counsel appointed as Lead Counsel.
11 Case settled, Final Approval granted, no objections and funds fully distributed.

12 e. **West v Iron Mountain Information Management, Inc., et. al.**; Los Angeles County
13 Superior Court, Case No. BC393709. Wage and Hour Class Action seeking past wages for
14 overtime, meal, and rest break violations for driver employees in the State of California.
15 Stipulation for "binding arbitration." Arbitration Award for Plaintiffs Class. Arbitration Award
16 confirmed. Plaintiffs' counsel lead trial counsel and class counsel.

17 f. **Gonzalez v. Superior Industries International, Inc., et al.**, Los Angeles County Superior
18 Court, Case No. BC 357912. Wage and Hour Class Action seeking past wages for overtime,
19 meal, and rest breaks violations for production employees in the State of California. Plaintiffs'
20 counsel appointed as lead counsel. Case settled, Final Approval granted, no objections and
21 funds fully distributed.

22 g. **Acosta v. Fleetwood Travel Trailers of California, Inc., et al.**, Riverside County
23 Superior Court, Case No. RIC 440630. Wage and Hour Class Action seeking past wages for
24 overtime, meal, and rest break violations for production employees in the State of California.
25 Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final Approval granted, no
26 objections and funds fully distributed.

27 h. **Walker v. Sharkeez, et al.**, Orange County Superior Court, Case No. 05CC00293. Wage
28 and Hour Class Action seeking past wages for unlawful deductions, meal, and rest break

violations for restaurant employees in the State of California. Plaintiffs' counsel appointed as lead counsel. Case settled. Final Approval granted and funds fully distributed.

i. ***Padron v. Universal Protection Service, et al***, Orange County Superior Court, Case No. 05CC00013. Wage and Hour Class Action seeking past wages for overtime, meal, and rest break violations for security officers in the State of California. Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

j. ***Martinez v. Securitas Security Services USA, et al.***, Santa Clara Superior Court, Case No. 105-CV047499, et al. J.C.C.P. No. 4460. Wage and Hour Class Action seeking past wages for meal and rest break violations for security officers employed by Defendants in the State of California. Plaintiffs' counsel and co-counsel. Case settled, Final Approval granted and funds fully distributed.

k. ***Velasquez-Lopez v. Hotel Cleaning Services, Inc. et al.***, Riverside Superior Court, Case No. RIC 420909. Wage and Hour Class Action seeking past wages for overtime, meal and rest break violations for housekeepers employed by Defendants in the State of California. Plaintiffs' counsel appointed as lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

l. ***Ruiz, et al. v. Unisource Worldwide, Inc., et al.***, USDC, CENTRAL DISTRICT, Case No. CV09-05848. Wage and Hour Class Action seeking past wages for meal and rest period violations for non-exempt employees employed by Defendants in the state of California. Case settled. Awaiting Preliminary Approval hearing. Plaintiffs have petitioned the Court for Lead Counsel.

m. ***Herrador v. Culligan International Company, et al.***, USDC, CENTRAL DISTRICT, Case No. SACV 08-680. Wage and Hour Class Action seeking past wages for field and branch employees of Defendants in the State of California. Plaintiffs' counsel appointed as lead counsel. Case settled and awaiting Final Approval.

n. ***Defries v. Domain Restaurants, et al.***, Orange County Superior Court, Case No. 05CC00128. Wage and Hour Class Action seeking past wages for restaurant employees of

Defendants in the State of California. Plaintiffs' counsel appointed as lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

o. **Denton v. BLB Enterprises, Inc., et al.**, Orange County Superior Court, Case No. 07CC01292. Wage and Hour Class Action seeking unpaid overtime, meal and rest break violations for security guards employed by Defendants in the State of California. Plaintiffs' counsel appointed as lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

p. **Rios v. Sandberg Furniture Manufacturing Co., Inc, et al.**, Los Angeles Superior Court, Case No. BC411477. Wage and Hour Class Action seeking unpaid meal and rest break violations for production employees employed by Defendants in the State of California. Plaintiff's counsel appointed as lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

q. **McMurray v. Dave and Busters, Inc., et al.**, Orange County Superior Court, Case No. 06CC00099. Wage and Hour Class Action seeking past wages for meal and rest break violations for restaurant employees employed by Defendants in the State of California. Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

r. **Osuna v. DFG Restaurants, Inc., et al.**, Los Angeles Superior Court, Case No. BC 330145. Wage and Hour Class Action seeking past wages of overtime for misclassification of managers employed by Defendant, DBA Carl's Jrs. in the State of California. Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

s. **Burns v. Gymboree Operations, Inc., et al.**, San Francisco Superior Court, Case No. CGC-07-461612. Wage and Hour Class Action seeking past wages for meal and rest break violations for retail employees employed by Defendants in the State of California. Plaintiffs' counsel appointed lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

1 t. **Willems v. Diedrich Coffee, Inc., et al.**, Orange County Superior Court, Case No.
2 07CC00015. Wage and Hour Class Action seeking past wages of overtime for misclassification
3 of managers employed by Defendants in the State of California. Plaintiffs' counsel appointed
4 lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

5 u. **Davila, et al. v. Beckman Coulter, Inc., et al.**, Orange County Superior Court, Case No.
6 07CC01347. Wage and Hour Class Action seeking past wages for overtime, meal and rest break
7 violations for production workers employed by Defendants in the State of California. Plaintiffs'
8 counsel appointed lead counsel. Case settled, Final Approval granted, no objections and funds
9 fully distributed.

10 v. **Perez v. Naked Juice Company of Glendora, Inc.**, Los Angeles Superior Court, Case
11 No. BC387088. Wage and Hour Class Action seeking past wages for overtime, meal and rest
12 period violations for production employees employed by Defendants in the State of California.
13 Plaintiff's counsel appointed as lead counsel. Case settled. Final Approval granted, no
14 objections and funds fully distributed.

15 w. **Coordination Proceeding Special Title [Rule 1550(b)] Wackenhut Wage and Hour**
16 **Cases**, Los Angeles Superior Court, Case No. JCCP 4545. Wage and Hour Class Action seeking
17 past wages for overtime, meal and rest period violations for security guards employed by
18 Defendants in the State of California. Certification granted. Plaintiffs' counsel appointed as co-
19 lead counsel. Writ taken. Court stays action pending Appellate Court ruling. Court lifts stay.

20 x. **Placencia v. Amcor Packaging Distribution, Inc.**, Orange County Superior Court, Case
21 No. 30-2013-00694012-CU-OE-CXC. Wage and Hour Class Action seeking past wages for
22 overtime, meal and rest period violations, and penalties on behalf of non-exempt production,
23 maintenance, shipping, and receiving employees employed by Defendants in California.
24 Plaintiff's counsel appointed as lead counsel. Case settled. Final Approval granted, no
25 objections and funds fully distributed.

26 y. **Trani v. Lisi Aerospace, et al.**, Los Angeles Superior Court, Case No. BC495527. Wage
27 and Hour Class Action seeking past wages for overtime, meal and rest period violations, and
28 penalties on behalf of non-exempt manufacturing employees employed by Defendants in

1 California. Plaintiff's counsel appointed as lead counsel. Case settled. Final Approval granted,
2 no objections and funds fully distributed.

3 **z. *Galvan v. Goodwin Co.***, Orange County Superior Court, Case No. 30-2013-00637062-
4 CU-OE-CXC, Wage and Hour Class Action seeking past wages for meal period violations, and
5 non-compliant wage statements on behalf of non-exempt production employees employed by
6 Defendants in California. Plaintiff's counsel appointed as lead counsel. Case settled. Final
7 Approval granted, no objections and funds fully distributed.

8 **aa. *Reyes v. Bristol Fiberlite***, Orange County Superior Court, Case No. 30-2013-00653425-
9 CU-OE-CXC. Wage and Hour Class Action seeking past wages for overtime, meal and rest
10 period violations, inaccurate wage statements, and penalties on behalf of non-exempt employees
11 employed by Defendants in California. Plaintiff's counsel appointed as lead counsel. Case
12 settled. Final Approval granted, no objections and distribution of funds pending.

13 **bb. *Gutierrez v. HMT Tank, USDC Central Dist.***, Case No. CV14-1967-CAS(MAN)
14 Wage and Hour Class Action seeking past wages for meal and rest period violations, failure to
15 indemnify necessary expenses, inaccurate wage statements, and penalties on behalf of non-
16 exempt employees working in positions related to servicing, refabricating, and repairing storage
17 tanks employed by Defendants in California. Plaintiff's counsel appointed as lead counsel. Case
18 settled. Final Approval granted, no objections and funds fully distributed.

19 **cc. *Williams v. Il Fornaio America Corp.***, Sacramento County, Case No. 34-2011-
20 0009616. Wage and Hour Class Action seeking past wages for overtime, meal and rest period
21 violations, reimbursements, and penalties on behalf of non-exempt restaurant employees
22 employed by Defendants in California. Plaintiff's counsel appointed as lead counsel. Case
23 settled. Final Approval granted, and funds fully distributed.

24 **dd. *Aguilar v. 7-Eleven, Inc.***, Orange County, Case No. 30-2009-002687141-CU-OE-CXC.
25 Wage and Hour Class Action seeking past wages for overtime, meal and rest period violations,
26 and penalties on behalf of non-exempt retail clerks employed by Defendants in California.
27 Plaintiff's counsel appointed as lead counsel. Case settled. Final Approval granted, no
28 objections and funds fully distributed.

1 **ee. *Madrigal v. Huntington Beach Market Broiler, Inc.***, Orange County, Case No. 30-
2 2012-00611260. Wage and Hour Class Action seeking past wages for overtime, meal and rest
3 period violations, reimbursements, and penalties on behalf of non-exempt employees employed
4 by Defendants in California. Plaintiff's counsel appointed as lead counsel. Case settled. Final
5 Approval granted, no objections and funds fully distributed.

6 **ff. *Vang v. Jazz Semiconductor, Inc.***, Orange County, Case no. 30-2011-00460278. Wage
7 and Hour Class Action seeking past wages for overtime, meal and rest period violations,
8 reimbursements, and penalties on behalf of non-exempt production workers employed by
9 Defendants in California. Plaintiff's counsel appointed as lead counsel. Case settled. Final
10 Approval granted, no objections and funds fully distributed.

11 gg. *Cano v. Financial Statement Services, Inc.*, Orange County, Case No. 30-2013-
12 00653349-CU-OE-CXC.

13 hh. *Gonzalez v. Quality Aluminum Force, LLC*, Orange County, Case No. 30-2015-
14 00817941-CU-OE-CXC.

15 ii. *Smith v. Space Exploration Technologies Corp.*, Los Angeles County Case No.
16 BC554258.

17 jj. *Madrigal v. Balda C Brewer, Inc.*, Orange County Case No. 30-2015-00820218-
18 CU-OE-CXC.

19 kk. *Mendez v. Liberty Glass Fabricators, Inc.*, Riverside County Case No. RIC
20 1800119.

21 ll. *Attia v. Neiman Marcus Group, Inc.*, United States District Court for the Central
22 District of California Case No. 8:16-cv-001504-DOC-FFM

23 mm. *Vigueras v. Red Robin*, United States District Court for the Central District of
24 California Case No. 8:17-cv-1422-JVS-DFM.

25 nn. *Payne v. Marriott Ownership Resorts, Inc.*, San Diego County Case No. 37-
26 2018-00015175-CU-OE-CTL.

27 7. In sum, my firm has been the lead or co-lead counsel in hundreds of cases since its
28 inception. We have recovered hundreds of millions of dollars for employees in the State of
California and millions for the State as well through PAGA.

1 8. Our firm has served as class counsel in a number of significant wage and hour
2 settlements. Of particular note, in 2019, our firm was co-lead counsel in securing the largest wage
3 and hour class action settlement in California history at \$130,000,000. During this case, plaintiffs
4 appealed a decertification order. This case involved several appeals. The appellate record amassed
5 an extensive appellate record comprising a 23-volume joint appendix, a three-volume reporters’
6 transcript, five briefs, four letter briefs, two motions for judicial notice, a motion to augment the
7 record, and several additional letters informing the appellate court of new legal authority issued
8 after *Dukes*. The matter was argued to and submitted by the Court of Appeal on September 15,
9 2016, and on November 21, 2016, the decertification order was reversed, and the case was
10 remanded for further proceedings. (*Lubin v. The Wackenhut Corporation* (“*Lubin*”), 5 Cal. App.
11 5th 960 (2016)). Wackenhut filed a petition for review of the Court of Appeal decision to the
12 California Supreme Court. The Supreme Court denied Wackenhut’s petition for review of *Lubin*.
13 The Court of Appeal issued remittitur on April 10, 2017. Eventually through more litigation, the
14 parties were able to secure the \$130 million settlement that was approved on October 21, 2019,
15 by Judge Highberger in the Los Angeles Superior Court.

16 9. Additionally, in early 2020, our firm served as lead counsel in a class action jury
17 trial in the Central District of California involving the class and PAGA representative claims of
18 over 23,000 employees which successfully resolved in the midst of trial for \$8,500,000.

19 10. Our firm has settled many high-stakes class and representative actions. Hawkins’
20 settlements have directly compensated hundreds of thousands of California workers and
21 consumers. Hawkins’ actions have also forced employers to modify their policies for the benefit
22 of employees including changing the compensation structure for certain employees and changing
23 practices to ensure that workers will be able to take timely rest and meal breaks. A leader in
24 prosecuting class and PAGA enforcement actions, Hawkins has secured millions of dollars for
25 workers and in civil penalties for the State of California.

26 11. Based on our experience, demonstrated competence, resources to prosecute the
27 claims at issue and reputation among our colleagues in the both the defense and plaintiffs’ bar, I
28 respectfully submit our firm’s experience in the field of wage and hour cases provides us the

1 ability to prosecute claims swiftly and often times without the need for protracted litigation as
2 here. Although, as demonstrated in the Wackenhut cases, we do not give up fighting for class
3 members when challenged and necessary. As such, we respectfully submit that we are adequate
4 Class Counsel.

5 12. As set forth in my preliminary approval declaration and based upon the
6 overwhelmingly positive It continues to be my opinion that this Settlement is fair, reasonable, and
7 adequate, and in the best interest of the Class. The Settlement is a good result by any measure,
8 particularly so considering Defendants' formidable arguments against liability and damages. In
9 light of these issues, and the fact that the Settlement was the product of protracted, contentious,
10 and arm's-length negotiations between highly experienced counsel with the assistance of a well-
11 respected neutral third-party mediator, I believe that the Settlement should be granted final
12 approved.

13 **CLASS COUNSEL FEES AND LITIGATION EXPENSES PAYMENT**

14 13. Class Counsel seeks an award of \$2,128,500 in attorneys' fees, which represents
15 one-third of the Gross Settlement Amount. (Settlement Agreement, ¶3.5.1.2.) Given the
16 extensive efforts of counsel, one-third of the Gross Settlement Amount is respectfully believed
17 to be a reasonable award. Class Counsel has borne the entire risk and cost of this litigation on a
18 pure contingency basis. The legal issues raised in this case were complex and drew significantly
19 upon the experience of Class Counsel. The proposed attorneys' fees accurately reflect the legal
20 marketplace and are within the range of customarily approved fees by California courts.

21 14. Despite the complexity of the case, Class Counsel has, through our investment of
22 substantial effort and resources, secured an outstanding settlement on behalf of the Class
23 Members. The issues and arguments Class Counsel has encountered and overcome in arriving at
24 the parties' negotiated settlement terms were also many and complex and required skillful
25 advocacy that can arise only out of experience, professional perspective, and success. Plaintiffs
26 would have faced substantial legal and factual obstacles in demonstrating that Class certification
27 was appropriate and that they would prevail on the merits in light of Defendants' asserted
28 defenses. Still, Class Counsel has negotiated a substantial settlement on behalf of the Class for

1 such claims. Plaintiffs would have also been required to establish a significant amount of
2 witness testimony, pattern and practice evidence, statistical evidence, sampling evidence, expert
3 testimony, and other evidence in order to evaluate and present arguments at both class
4 certification and trial. Defendants have vigorously challenged the claims pled in the operative
5 complaint, contested liability, the amount of claimed damages, and the propriety of Class
6 Certification, and would have continued to do so through trial. Accordingly, Class Counsel
7 believes the Settlement to be fair, reasonable, and adequate and that it is in the best interest of
8 the Class Members. The fairness and adequacy of the Settlement is confirmed by all known
9 facts and circumstances, including the risk of significant delay and uncertainty associated with
10 litigation, the various defenses asserted by Defendant, and numerous potential appellate issues.

11 15. Plaintiffs and Class Counsel respectfully submit the fees and costs provision of
12 the Settlement is fair and reasonable both when cross-checked under the lodestar and common
13 fund method. The total billable hours that our firm (and the other firms in this invested and will
14 invest in prosecuting this action and the related actions which gave rise to the Settlement, should
15 this Honorable Court approve the settlement, is substantial. I respectfully submit that our fees
16 and costs request is fair and reasonable because our office has expended substantial time and
17 effort in achieving the proposed Settlement, including the following tasks: investigating the
18 factual and legal basis of the action; analyzing documents provided by Plaintiffs, including time
19 and payroll documents and policy documents; conferences with Plaintiffs; witness interviews;
20 investigating Defendants' organization and structure from publicly available information;
21 preparing the complaints and pursuing two separate actions; preparing a discovery plan and
22 Rule 26 report; appearing at case management and status conferences; preparing and reviewing
23 formal and informal document and data discovery requests; engaging in meet and confer efforts
24 regarding formal and informal discovery; reviewing and analyzing thousands of pages of
25 documents, including policy documents and a significant volume of time and payroll data;
26 conversations with defense counsel regarding the claims alleged in this action, and the
27 information needed for analysis; compiling relevant data; working with an expert and preparing
28 complex damages analysis and extrapolation of damages to the entire Class; preparing for and

1 attending a full day of mediation; negotiating and finalizing a Settlement with Defendants'
2 Counsel following mediation; soliciting proposals from Administrators; drafting the preliminary
3 approval motion and supporting papers; monitoring the administration process, revising the
4 motion for final approval, and preparing declarations in support. As such, I respectfully submit
5 that a lodestar cross-check will support the reasonableness of the requested fees, and a low
6 multiplier, if any, need be applied to reach the requested fee allocation.

7 16. I submit that the requested attorneys' fees of one-third the Gross Settlement
8 Amount that Class Counsel has obtained on behalf of the Class Members is fair and reasonable,
9 as are the hourly rates at which our attorneys bill.

10 17. I am the founding partner at James Hawkins, APLC and have devoted in excess
11 of 102.2 hours in prosecuting this case on behalf of Plaintiffs and the Class. In 1993, I graduated
12 from the University of California, Los Angeles with a Bachelor of Arts Degree. Following
13 graduation, I attended Whittier Law School. In 1996, while a full-time law student, I was also a
14 full-time Judicial Extern for the Honorable Consuelo B. Marshall, United States District Court,
15 Central District. After approximately five months of service for Judge Marshall, I became a
16 full-time extern for the United States Attorney's Office, Central District of California. My
17 externship lasted for approximately five months. Thereafter, in 1997, I graduated from Whittier
18 Law School. The same year, I was admitted to practice law in the State of California. Since its
19 inception, this law firm has been exclusively involved in class action and complex litigation. In
20 2009, I opened an additional office in Miami, Florida, prosecuting wage and hour class actions.
21 Since 2002, I have been lead counsel or co-lead counsel in hundreds of wage and hour class
22 actions. My hourly rate is \$1,050.00 per hour. I have expended in excess of 102.2 hours in
23 litigating this case. The following is a summary of my tasks and activities in prosecuting this
24 matter: intake; review due diligence; legal and factual research; witness interviews; extensive
25 investigation and document review in connection with the filing of the complaints; notes in
26 connection with the due diligence; reviewing related cases; strategy regarding various actions;
27 coordination proceedings; reviewing and revising pleadings; strategy with attorneys;
28 conferences with clients; reviewing and revising motions; conferences regarding certification
issues; reviewing informal discovery; mediation preparation; conferences with expert;

1 conferences re damages model and settlement; conferences with co-counsel; conferences with
2 defense counsel; reviewing and revising settlement-related documentation; and reviewing
3 relevant documentation regarding the claims and defenses. The number of hours I have
4 expended for work performed and the corresponding attorney's fees of approximately
5 \$107,310.00 are reasonable and necessary.

6 18. Christina Lucio is Of Counsel to James Hawkins, APLC and has been the lead
7 day to day attorney on this case. She has devoted in excess of 190.5 hours in prosecuting the
8 Action. Such hours were reasonable and necessary. Ms. Lucio has 17 years of experience and
9 primarily handled the day-to-day litigation of this matter and the related actions during the
10 pendency of this case. Ms. Lucio graduated from the University of California, Riverside in 2003
11 and received her law degree from the University of Southern California in 2007. She has been a
12 member of the State Bar of California since 2007. Her practice focuses primarily on
13 employment law including wrongful termination, discrimination, retaliation, wage and hour
14 violations (individual and class action), and sexual harassment claims. In recent years, a
15 substantial part of her practice has been focused on representative and class actions, including
16 wage and hour litigation. Ms. Lucio's hourly rate is currently \$775 per hour. The number of
17 hours Ms. Lucio expended for work performed and the corresponding attorney's fees of
18 \$147,637.50 are reasonable and necessary. The following is a summary of Ms. Lucio's tasks
19 and activities in prosecuting this matter: review notes from due diligence and witness
20 interviews; reviewing client documentation; drafting multiple complaints and LWDA letters;
21 client conferences; due diligence; drafting amended pleadings; conferences re strategy;
22 conferences with co-counsel; conferences with defense counsel; compiling data and documents;
23 drafting the Rule 26 report; reviewing related actions; reviewing coordination proceedings;
24 drafting stipulations; day to day correspondence and case management in this action and the
25 related actions; attending case management and status conferences in three related actions;
26 drafting formal and informal discovery requests and responses; reviewing productions;
27 mediation preparation; reviewing informal discovery; attending mediation; negotiations with
28 the mediator; reviewing and revising the memorandum of understanding; reviewing and revising
the settlement agreement; obtaining bids for administration; conferences with prospective

1 administrators; reviewing relevant documentation regarding the claims and defense; preparing
2 the motion for preliminary approval and related documents; conferences with the administrator;
3 supervising administration process; reviewing and revising motion for final approval; preparing
4 declarations in support of the motion for approval; and attending hearings.

5 19. Mitchell Murray is Of Counsel to James Hawkins, APLC. Mr. Murray is a 2007
6 graduate of the University of California, San Diego and 2012 graduate of California Western
7 School of Law. He was admitted to the State Bar of California in 2012. He is a member of the
8 Consumers Attorneys of San Diego. He was selected as a “Rising Star” in 2019 by Super
9 Lawyers Magazine. Mr. Murray’s legal experience has focused primarily on all areas of
10 employment law. Since 2016, he has focused his practice in the area of wage and hour class
11 action. Mr. Murray has dedicated 80.4 hours in prosecuting this action on behalf of Plaintiffs,
12 and the Class. Such hours are reasonable and necessary. The following is a summary of Mr.
13 Murray’s tasks and activities in prosecuting this matter: reviewing and revising the pleadings;
14 attending case management conferences and status conferences; drafting relevant stipulations;
15 conferences and correspondence with co-counsel and defense counsel; conferences with clients;
16 conferences with witnesses; mediation preparation; research regarding factual and legal issues;
17 memoranda re same; attending mediation; reviewing court orders; reviewing and revising the
18 MOU; reviewing and revising settlement agreement and related documents; conferences with
19 clients; and assisting with pleadings and motions in the approval process. Mr. Murray's hourly
20 rate is \$725.00 per hour. The number of hours expended by Mr. Murray for work performed and
the corresponding attorney's fees of \$58,290 are reasonable and necessary.

21 20. Our junior associate attorneys (Danielle Piskor (admitted 2021), Eric Tims
22 (admitted 2022), and Paul Brown (admitted 2021)) have dedicated in excess of 30.2 hours in
23 prosecuting this action on behalf of Plaintiffs and the Class. Our associates’ hourly rates are
24 \$450.00 per hour. The following is a summary of our associates’ tasks and activities in
25 prosecuting this matter: compiling relevant documentation and data, assisting with mediation
26 preparation, attending case management and status conferences, assisting with legal and factual
27 research, conferences with clients, assisting with discovery, creating the initial drafts of
28

pleadings and motions. The number of hours expended by our associates for work performed and the corresponding attorney's fees of \$13,590 are reasonable and necessary.

21. Our paralegals (Melissa Whitson, Michael Cipriano, and Camille Baylis) have dedicated over 65.9 hours in assisting with the prosecution of this case. Their hourly rate is \$200.00 per hour. The number of hours expended for work performed and the corresponding fees of \$13,180 are reasonable and necessary.

22. The number of hours (469.2) James Hawkins, APLC has spent working on this litigation was necessary and reasonable in pursuit of the Settlement. The lodestar for James Hawkins APLC is approximately \$340,007.50. This is exclusive of the additional amounts incurred by my co-counsel in this case. I submit that the requested attorneys' fees of one-third of the Gross Settlement Amount that Class Counsel has obtained to resolve the actions is fair and reasonable, as are the hourly rates at which our attorneys bill.

James Hawkins APLC Lodestar Summary				
Timekeeper	Years	Hours	Rate	Total
James Hawkins, Esq.	26	102.2	\$1050	\$107,310.00
Christina Lucio	17	190.5	\$775	\$147,637.50
Mitchell Murray	12	80.4	\$725	\$58,290.00
Junior Associate Attorneys	1-2	30.2	\$450	\$13,590.00
Paralegal Staff		65.9	\$200	\$13,180.00
TOTALS		469.2		\$340,007.50

23. We respectfully submit that our hourly rates are reasonable in light of the hourly rates charged in the marketplace for comparable skill, years of experience and services. A true and correct copy of the 2021 Wolters Kluwer Real Rate Report, attached as **Exhibit 1**, and the Laffey Matrix, attached as **Exhibit 2**. I believe James Hawkins, APLC's hourly rates are in line with, and, in fact are modest compared with the hourly rates of other counsel in similar actions.

24. As set forth in my co-counsel's declaration, the Settlement achieved is a fair, reasonable, and adequate resolution of the Action in light of the claims and defenses at issue.

25. The Settlement that Counsel has negotiated on behalf of the Class confronts very difficult and potentially individualized issues which make trial on the merits challenging. I and our firm's attorneys and paralegals, along with co-counsel, have secured this Settlement through persistent advocacy of the claims, which has applied legal nuances and negotiation techniques to

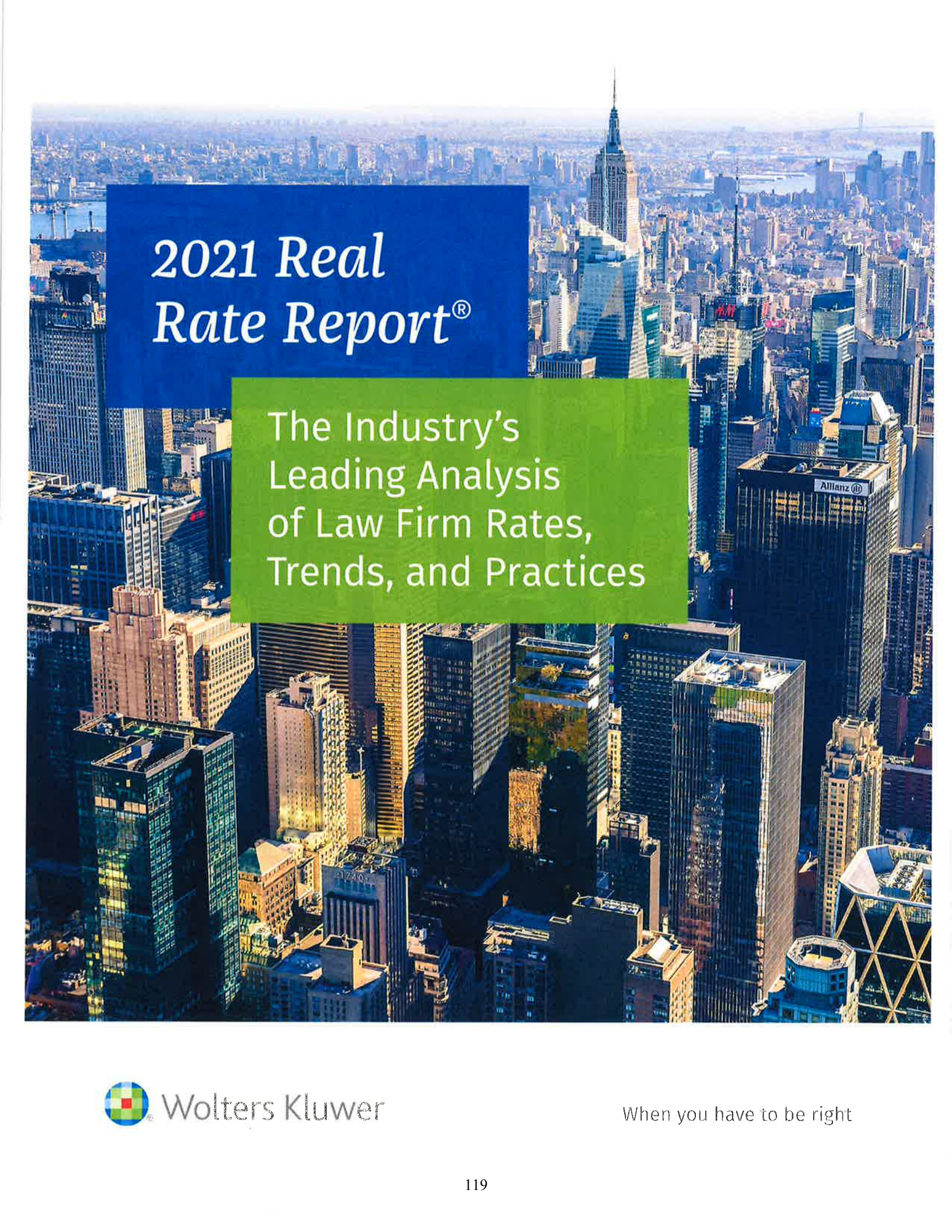
1 achieve a very favorable result under the circumstances. Other attorneys without our experience
2 and comprehensive knowledge and perspective in connection with complex employment
3 litigation may not have been able to achieve such superior settlement terms on behalf of the
4 Class. I believe the requested amount of attorneys' fees under the Settlement is a reasonable
5 allocation given the excellent result we have achieved. I, therefore, respectfully request the
6 Court approve the allocated attorneys' fees under the Parties' Settlement.

7 26. In serving as Class Counsel in this action and the related actions which ultimately
8 led to the Settlement, my firm will also seek reimbursement for the out-of-pocket costs of
9 \$24,886.93. This does not include the costs incurred by our co-counsel. A summary of the
10 costs incurred by our firm to date in this action is attached herewith as **Exhibit 3**. I believe that
11 all of these fees and costs are reasonable and necessarily incurred in litigating this matter and in
12 pursuit of the settlement.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct. Executed on November 1, 2024, at Irvine, California.

15
16 
17 James R. Hawkins
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28

EXHIBIT 1



2021 Real Rate Report®

The Industry's
Leading Analysis
of Law Firm Rates,
Trends, and Practices



Wolters Kluwer

When you have to be right

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A Letter to Our Readers

Welcome to the Wolters Kluwer's ELM Solutions Real Rate Report®, the industry's leading data-driven benchmark report for lawyer rates.

Our Real Rate Report has been a relied upon data analytics resource to the legal industry since its inception in 2010 and continues to evolve. The Real Rate Report is powered by Wolters Kluwer's ELM Solutions LegalVIEW® data warehouse, the world's largest source of legal performance benchmark data, which has grown to include over \$150 billion in anonymized legal data.

This year, we launched our LegalVIEW Insights Report series, which explores the emerging trends behind the overall legal spend volatility seen in corporate legal departments. The insights reports coupled with the Real Rate Report are great tools to drive actionable decisions.

The legal services industry relies on internal analytics and the use of external data resources, such as the LegalVIEW® data warehouse, to support legal management strategies. The depth and details of the data in the Real Rate Report enable you to better benchmark and make more informed investment and resourcing decisions for your organization.

As with past Real Rate Reports, all of the data analyzed are from corporations' and law firms' e-billing and time management solutions. We have included lawyer and paralegal rate data filtered by specific practice and sub-practice areas, metropolitan areas, and types of matters to give legal departments and law firms greater ability to pinpoint areas of opportunity. We strive to make the Real Rate Report a valuable and actionable reference tool for legal departments and law firms.

As always, we welcome your comments and suggestions on what information would make this publication more valuable to you. We thank our data contributors for participating in this program. And we thank you for making Wolters Kluwer's ELM Solutions your trusted partner for legal industry domain expertise, data, and analytics and look forward to continuing to provide market-leading, expert solutions that deliver the best business outcomes for collaboration among legal departments and law firms.

Sincerely,



Barry Ader

Vice President, Product Management and Marketing
Wolters Kluwer's ELM Solutions

Report Use Considerations

2021 Real Rate Report

- Examines law firm rates over time
- Identifies rates by location, experience, firm size, areas of expertise, industry, and timekeeper role (i.e., partner, associate, and paralegal)
- Itemizes variables that drive rates up or down

All the analyses included in the report derive from the actual rates charged by law firm professionals as recorded on invoices submitted and approved for payment.

Examining real, approved rate information, along with the ranges of those rates and their changes over time, highlights the role these variables play in driving aggregate legal cost and income. The analyses can energize questions for both corporate clients and law firm principals.

Clients might ask whether they are paying the right amount for different types of legal services, while law firm principals might ask whether they are charging the right amount for legal services and whether to modify their pricing approach.

Some key factors¹ that drive rates²:

Attorney location - Lawyers in urban and major metropolitan areas tend to charge more when compared with lawyers in rural areas or small towns.

Litigation complexity - The cost of representation will be higher if the case is particularly complex or time-consuming; for example, if there are a large number of documents to review, many witnesses to depose, and numerous procedural steps, the case is likely to cost more (regardless of other factors like the lawyer's level of experience).

Years of experience and reputation - A more experienced, higher-profile lawyer is often going to charge more, but absorbing this higher cost at the outset may make more sense than hiring a less expensive lawyer who will likely take time and billable hours to come up to speed on unfamiliar legal and procedural issues.

Overhead - The costs associated with the firm's support network (paralegals, clerks, and assistants), document preparation, consultants, research, and other expenses.

Firm size - The rates can increase if the firm is large and has various timekeeper roles at the firm. For example, the cost to work with an associate or partner at a larger firm will be higher compared to a firm that has one to two associates and a paralegal.

Rates increase in geographic areas with growing population

Additional analysis was performed to examine the impact of geographic location on law firm hourly rates. This report, like previous ones, shows that large, cosmopolitan legal services markets like New York City, San Francisco, and Los Angeles are associated with higher hourly rates. In addition, our analysis reveals a significant spike in hourly rates in areas of the country

¹ David Goguen, J.D., University of San Francisco School of Law (2020) Guide to Legal Services Billing Retrieved from: <https://www.lawyers.com/legal-info/research/guide-to-legal-services-billing-rates.html>

² Source: 2018 RRR. Factor order validated in multiple analyses since 2010

Report Use Considerations

that are currently experiencing high population growth. Significant average rate increases occurred from 2020 to 2021 in many areas, but especially Fresno, California (~15% average rate increase), Greenville, SC (~18%), Miami, FL (~9%), Nashville, TN (~11%), Oklahoma City (~13%), Phoenix, AZ (~10%), and Seattle, WA (~11%) -- all of which have experienced much higher than average population growth in recent years.

The correlation between hourly rates and population growth makes sense. When people and businesses move into an area, it creates a spike in demand for all sorts of goods and services, including legal services. However, it is hard for the supply of legal services to move as quickly as demand because attorneys looking to move into a new geographic area face high switching costs that most will refuse to pay unless they absolutely have to.

First, attorneys looking to take work in a new state have to get licensed there, which takes time and effort and is a distraction that can reduce their current income in the form of the number of hours they are able to bill to clients. Second, despite the rise in remote working, many attorneys looking to establish practices in a new geographic location may have to establish at least some physical presence there, find a new office, new lodging, and potentially uproot their entire family. Third, even if the switching costs of licensure, physically moving, etc. are paid, attorneys may fear yet another switching cost in the form of attrition of their existing clients from their original geographic locale, who may view them as no longer investing in their knowledge of the legal problems and legal solutions that are specific to the original locale.

³ Source: 2020 RRR. Factor order validated in multiple analyses since 2010

Section I: High-Level Data Cuts

Cities

By Matter Type

2021 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2021	2020	2019
Kansas City MO	Non-Litigation	Associate	95	\$250	\$320	\$385	\$323	\$288	\$278
		Partner	14	\$285	\$350	\$484	\$402	\$445	\$413
Las Vegas NV	Non-Litigation	Partner	19	\$250	\$300	\$445	\$375	\$421	\$480
		Associate	12	\$238	\$323	\$377	\$320	\$282	\$280
Little Rock AR	Non-Litigation	Partner	12	\$215	\$215	\$300	\$267	\$290	\$274
Los Angeles CA	Litigation	Partner	342	\$475	\$715	\$1,042	\$759	\$708	\$694
		Associate	433	\$402	\$602	\$806	\$610	\$583	\$535
Los Angeles CA	Non-Litigation	Partner	559	\$600	\$880	\$1,160	\$894	\$872	\$816
		Associate	761	\$480	\$685	\$895	\$696	\$665	\$620
Louisville KY	Litigation	Partner	18	\$265	\$356	\$405	\$344	\$353	\$338
		Associate	16	\$178	\$200	\$278	\$225	\$227	\$214
Louisville KY	Non-Litigation	Associate	12	\$208	\$215	\$249	\$224	\$230	\$197
		Partner	15	\$244	\$389	\$529	\$421	\$424	\$430
Madison WI	Non-Litigation	Partner	15	\$244	\$389	\$529	\$421	\$424	\$430
Memphis TN	Litigation	Partner	16	\$290	\$415	\$425	\$364	\$355	\$347
		Associate	20	\$298	\$340	\$369	\$345	\$346	\$334
Memphis TN	Non-Litigation	Partner	20	\$298	\$340	\$369	\$345	\$346	\$334
		Associate	12	\$208	\$215	\$249	\$224	\$230	\$197
Miami FL	Litigation	Partner	100	\$282	\$475	\$614	\$465	\$473	\$453

Section I: High-Level Data Cuts

Cities

By Years of Experience

2021 - Real Rates for Associate

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2021	2020	2019
Jackson MS	7 or More Years	22	\$55	\$55	\$183	\$124	\$125	\$183
Kansas City MO	3 to Fewer Than 7 Years	26	\$252	\$310	\$349	\$306	\$294	\$292
	7 or More Years	28	\$295	\$325	\$370	\$325	\$283	\$282
Los Angeles CA	Fewer Than 3 Years	70	\$494	\$533	\$622	\$543	\$511	\$413
	3 to Fewer Than 7 Years	128	\$533	\$709	\$821	\$673	\$582	\$510
	7 or More Years	164	\$412	\$565	\$841	\$629	\$604	\$576
Miami FL	3 to Fewer Than 7 Years	14	\$277	\$340	\$408	\$364	\$323	\$323
	7 or More Years	30	\$310	\$475	\$540	\$431	\$429	\$374
Minneapolis MN	3 to Fewer Than 7 Years	23	\$330	\$351	\$462	\$394	\$388	\$355
	7 or More Years	26	\$326	\$448	\$580	\$441	\$397	\$384
Nashville TN	7 or More Years	13	\$245	\$283	\$325	\$287	\$271	\$253
New Orleans LA	3 to Fewer Than 7 Years	13	\$235	\$238	\$280	\$251	\$260	\$248
	7 or More Years	13	\$260	\$340	\$364	\$324	\$326	\$276
New York NY	Fewer Than 3 Years	160	\$440	\$590	\$775	\$629	\$560	\$513
	3 to Fewer Than 7 Years	237	\$412	\$670	\$875	\$681	\$625	\$559

Section I: High-Level Data Cuts

Cities

By Years of Experience

2021 - Real Rates for Partner

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2021	2020	2019
Los Angeles CA	Fewer Than 21 Years	173	\$550	\$855	\$1,065	\$815	\$724	\$703
	21 or More Years	332	\$527	\$725	\$1,145	\$844	\$818	\$758
Memphis TN	Fewer Than 21 Years	11	\$283	\$300	\$340	\$317	\$324	\$309
	21 or More Years	17	\$365	\$415	\$425	\$391	\$379	\$370
Miami FL	Fewer Than 21 Years	44	\$408	\$540	\$583	\$503	\$484	\$485
	21 or More Years	99	\$414	\$550	\$750	\$569	\$564	\$532
Milwaukee WI	Fewer Than 21 Years	14	\$306	\$358	\$433	\$373	\$355	\$323
	21 or More Years	26	\$375	\$470	\$545	\$535	\$530	\$431
Minneapolis MN	Fewer Than 21 Years	41	\$400	\$520	\$604	\$513	\$515	\$478
	21 or More Years	82	\$450	\$659	\$789	\$619	\$591	\$579
Nashville TN	Fewer Than 21 Years	27	\$375	\$464	\$495	\$436	\$413	\$374
	21 or More Years	49	\$420	\$470	\$536	\$481	\$472	\$433
New Orleans LA	Fewer Than 21 Years	24	\$275	\$305	\$390	\$346	\$361	\$337
	21 or More Years	40	\$295	\$332	\$412	\$352	\$373	\$369
New York NY	Fewer Than 21 Years	456	\$656	\$1,044	\$1,407	\$1,033	\$987	\$938

Section I: High-Level Data Cuts

Cities

By Role

2021 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Role	n	First Quartile	Median	Third Quartile	2021	2020	2019
Little Rock AR	Partner	16	\$215	\$250	\$300	\$272	\$287	\$282
Los Angeles CA	Partner	786	\$536	\$822	\$1,101	\$843	\$808	\$766
	Associate	1,110	\$450	\$653	\$860	\$664	\$636	\$587
Louisville KY	Partner	25	\$278	\$355	\$400	\$348	\$363	\$348
	Associate	25	\$180	\$210	\$264	\$224	\$228	\$210
Madison WI	Partner	15	\$241	\$389	\$536	\$419	\$435	\$440
Memphis TN	Partner	30	\$290	\$351	\$415	\$354	\$351	\$342
Miami FL	Partner	226	\$360	\$530	\$675	\$525	\$524	\$516
	Associate	149	\$265	\$361	\$475	\$375	\$381	\$365
Milwaukee WI	Partner	52	\$316	\$390	\$476	\$452	\$450	\$387
	Associate	36	\$270	\$305	\$358	\$316	\$305	\$269
Minneapolis MN	Partner	175	\$419	\$595	\$711	\$578	\$544	\$531
	Associate	137	\$295	\$406	\$521	\$405	\$377	\$376
Nashville TN	Partner	108	\$375	\$468	\$535	\$463	\$457	\$414
	Associate	73	\$252	\$311	\$338	\$305	\$283	\$257

EXHIBIT 2

LAFFEY MATRIX

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

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375

6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363
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The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $\frac{1}{2}$ Years Out of Law School $\frac{1}{2}$ is calculated from June 1 of each year, when most law students graduate. $\frac{1}{2}$ 1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $\frac{1}{2}$ 4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $\frac{1}{2}$ 1-3" from June 1, 1996 until May 31, 1999, would move into tier $\frac{1}{2}$ 4-7" on June 1, 1999, and tier $\frac{1}{2}$ 8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT 3

Matter Billing Detail

Report Date: 11/1/2024
Report Time: 12:35PM
Page: 1 of 2
User ID: R. Hawkins

JAMES HAWKINS APLC

Date Range: 01/01/1900 to 11/01/2024

Client: TARGETDISTRB - Gustavo Medina

Matter: TARGETFCRA - Target Distribution -PAGA- Gustavo Medina and Janira Perez

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
04/29/2022	FST	First Legal Network- Filed PAGA Complaint and Initial Docs In30199329	\$1,719.91		Unbilled				
06/07/2022	FST	First Legal Network- Filing- Amended PAGA Complaint IN#30202789	\$166.61		Unbilled				
06/30/2022	FST	First Legal Network- Dec of Lucio ISO OSC IN#30202789	\$81.21		Unbilled				
08/10/2022	FST	First Legal Network - Filing-Branch: Request for Dismissal, Dec of Lucio IN#30212421	\$81.21		Unbilled				
08/16/2022	FST	First Legal Network- Filing-Branch: Joint Initial CMC #30209403	\$81.21		Unbilled				
08/22/2022	CCL	Court Call - Case Management Conf 8/22/22-CML	\$94.00		Unbilled				
12/29/2022	MED	Mediation Services- CK#10497	\$7,725.00		Unbilled				
01/03/2023	FST	First Legal Network - Additional Billing - Reqst for Dismissal, Dec of C. Luc IN# 30224217	\$1,122.00		Unbilled				
02/14/2023	FST	First Legal Network- Filing - Joint CMC Statement IN# 30227367	\$134.07		Unbilled				
12/01/2023	FST	First Legal Network - Filing - Joint Case Management Conference St IN# 30263586	\$84.65		Unbilled				
03/28/2024	FST	First Legal Network - Filing - Case Status Conference Report and POS IN# 30275374	\$91.29		Unbilled				
05/29/2024	POS	Postage - 05.29.24 Crs agents re amended LWDA Letter	\$23.20		Unbilled				
06/04/2024	FST	First Legal Network - Filing - Joint Stip to File SAC, Prop Order, Notice of Motion and Motion for Pre, Declaration of Sergio Garcia in Sup IN# 30287287	\$260.24		Unbilled				
06/12/2024	FST	First Legal Network - Filing - Motion for Preliminary Approval, Second Amended Complaint IN# 30290822	\$488.23		Unbilled				
06/26/2024	FST	First Legal Network - Filing - CMC Electron IN# 30287287	\$43.20		Unbilled				
07/12/2024	FST	First Legal Network - Filing - Notice Filed IN# 30290822	\$43.20		Unbilled				
07/18/2024	CCL	Court Call - CCL	\$72.00		Unbilled				

Matter Billing Detail

JAMES HAWKINS APLC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Total:			\$12,311.23	\$0.00					
Balance:			\$12,311.23						
Total Fees Billed-----			\$0.00						
Total Fees Unbilled : -----			\$0.00						
Total Fees Received : -----			\$0.00						
Total Soft Cost Billed : -----			\$0.00						
Total Soft Cost Unbilled : -----			\$0.00						
Total Soft Cost Received : -----			\$0.00						
Total Hard Cost Billed : -----			\$0.00						
Total Hard Cost Unbilled : -----			\$12,311.23						
Total Hard Cost Received : -----			\$0.00						
Total Taxes Billed : -----			\$0.00						
Total Taxes Unbilled : -----			\$0.00						
Total Taxes Received : -----			\$0.00						
Total Late Charges Billed : -----			\$0.00						
Total Late Charges Unbilled: -----			\$0.00						
Total Late Charges Received : -----			\$0.00						
Trust Balance: -----			\$0.00						

Matter Billing Detail

JAMES HAWKINS APLC

Date Range: 01/01/1900 to 11/01/2024
Client: TARGETDISTRB - Gustavo Medina
Matter: TARGET1388 - Target Distribution Center FCRA - Gustavo Medina & Janira Perez

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Balance Forward:			\$0.00						
06/06/2022	FST	First Legal Network- Filing: FCRA Complaint and Initial Docs IN#30202789	\$575.11		Unbilled				
04/04/2024	POS	Postage - 04.04.24 Crs to Client (Janira) re Contact	\$8.69		Unbilled				
Total:			\$583.80	\$0.00					
Balance:			\$583.80						
Total Fees Billed- -----			\$0.00						
Total Fees Unbilled : -----			\$0.00						
Total Fees Received : -----			\$0.00						
Total Soft Cost Billed : -----			\$0.00						
Total Soft Cost Unbilled : -----			\$0.00						
Total Soft Cost Received : -----			\$0.00						
Total Hard Cost Billed : -----			\$0.00						
Total Hard Cost Unbilled : -----			\$583.80						
Total Hard Cost Received : -----			\$0.00						
Total Taxes Billed : -----			\$0.00						
Total Taxes Unbilled : -----			\$0.00						
Total Taxes Received : -----			\$0.00						
Total Late Charges Billed : -----			\$0.00						
Total Late Charges Unbilled: -----			\$0.00						
Total Late Charges Received : -----			\$0.00						
Trust Balance: -----			\$0.00						

Matter Billing Detail

JAMES HAWKINS APLC

Date Range: 01/01/1900 to 11/01/2024
Client: TARGETDISTRB - Gustavo Medina
Matter: TARGETDISTRIBUN - Target Distribution Center-0805- Gustavo Medina and Janira Perez v. Ta

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
02/22/2022	FIL	Filing Fee - LWDA Filing fee	\$75.00		Unbilled				
02/22/2022	POS	Postage - LWDA Cert mail	\$17.92		Unbilled				
02/22/2022	FST	First Legal Network - Filing branch pdf same day, class complaint and initial docs, IN#30192286	\$1,680.71		Unbilled				
04/01/2022	FST	First Legal Network - Filing - FAC, Proof of Service, Process Serve - Class Complaint and Initial Docs IN# 30195930	\$349.64		Unbilled				
06/08/2022	FED	FED EX- 06.08.22 Crs to Client re Contact	\$20.93		Unbilled				
06/20/2022	CCL	Court Call- Case Management Conference for CML	\$94.00		Unbilled				
08/04/2022	FST	First Legal Network- Joint Rule Report- Courtesy Delivery IN#30209403	\$31.00		Unbilled				
08/09/2022	FED	FED EX-- Target- CRS re contact to Medina	\$27.35		Unbilled				
08/10/2022	FST	First Legal Network-Filed: Plf CMC Statement and Notice of Scheduled Review Hearing IN#30209403	\$162.43		Unbilled				
03/20/2023	POS	Postage - 03.20.23 Cert Mail (x2) re Amended LWDA Ntc adding Plf Garcia	\$10.92		Unbilled				
11/21/2023	EXA	Expert Analysis IN#7515 CK#11300	\$9,522.00		Unbilled				
		Total:	\$11,991.90	\$0.00					
		Balance:	\$11,991.90						

Matter Billing Detail

JAMES HAWKINS APLC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Total Fees Billed- - - - -			\$0.00						
Total Fees Unbilled : - - - - -			\$0.00						
Total Fees Received : - - - - -			\$0.00						
Total Soft Cost Billed : - - - - -			\$0.00						
Total Soft Cost Unbilled : - - - - -			\$0.00						
Total Soft Cost Received : - - - - -			\$0.00						
Total Hard Cost Billed : - - - - -			\$0.00						
Total Hard Cost Unbilled : - - - - -			\$11,991.90						
Total Hard Cost Received : - - - - -			\$0.00						
Total Taxes Billed : - - - - -			\$0.00						
Total Taxes Unbilled : - - - - -			\$0.00						
Total Taxes Received : - - - - -			\$0.00						
Total Late Charges Billed : - - - - -			\$0.00						
Total Late Charges Unbilled: - - - - -			\$0.00						
Total Late Charges Received : - - - - -			\$0.00						
Trust Balance: - - - - -			\$0.00						