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Attorneys for Plaintiff Monique Bravo

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

MONIQUE BRAVO, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

OPTUMCARE MANAGEMENT, LLC, a
California Corporation,

Defendants.

Lead Case No. 22STCV12240 (“Bravo I”)
(Consolidated with Case No. 23STCV17426
 (“Bravo II”))

ASSIGNED FOR ALL PURPOSES TO:
Honorable Brock T. Hammond, Dept. 407

**CONSOLIDATED REPRESENTATIVE
ACTIONS**

**DECLARATION OF DAVID R. MARKHAM
PLAINTIFF’S MOTION FOR APPROVAL
OF PRIVATE ATTORNEYS GENERAL ACT
 (“PAGA”) SETTLEMENT**

Date: September 10, 2026

Time: 8:30 a.m.

Dept: 407

Reservation No.: 267317946638

Complaint filed: April 11, 2022

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DECLARATION OF DAVID R. MARKHAM

I, David R. Markham, declare:

1. I am an attorney licensed to practice before all courts of the State of California. I am counsel of record for Plaintiff Monique Bravo in this action. I make this Declaration in support of Plaintiff's Unopposed Motion for Approval of PAGA Representative Action Settlement. I make this declaration based on my personal knowledge, and if called to testify, I could and would competently testify to the matters contained in this declaration. I join in the description provided by my co-counsel in their concurrently filed declarations in support of approval of this settlement.

2. The Representative Settlement in this action is the product of arms'-length bargaining between attorneys who are highly experienced in complex class and representative actions. We thoroughly evaluated the evidence supporting the claims and defenses at issue and were very well positioned to evaluate the Settlement's relative strengths and benefits. The parties are well-versed in the evidentiary record upon which Plaintiff's claims are based. We engaged in substantial discovery, including an exchange of information and depositions, damages analysis and mediation. Meaningful discovery led to a point where the parties were well postured to resolve this action.

Qualifications of Class Counsel

3. I am The Markham Law Firm's founding partner. I graduated from Cornell University and Columbia Law School, and have been practicing law in California since 1976. I have extensive experience in class and representative action litigation, including wage and hour, consumer, antitrust, and securities litigation. I have been acting lead or co-lead counsel and appointed class counsel in hundreds of class and representative action cases in federal and state courts in California and throughout the United States, including over thirty reported and widely-cited appellate cases. I have conducted trials in over twenty cases, both bench and jury trials, including class action trials.

1 4. My firm has obtained many large class and representative action settlements which
2 have benefited consumers and employees. Two of those cases alone have resulted in recovery of
3 over a billion dollars for class members. In *Jordan v. California Department of Motor Vehicles*,
4 we obtained a settlement fund of over \$665 million for the benefit of new California residents
5 who registered their out-of-state vehicles and were unlawfully charged the \$300 smog impact fee.
6 *Jordan v. California Dep't of Motor Vehicles*, 100 Cal. App. 4th 431, 440, (2002), as modified on
7 denial of reh'g (Aug. 20, 2002). In *Sparks v. AT&T et al.*, a settlement fund of over \$350 million
8 was obtained for consumers nationwide who had been overcharged for residential telephone
9 equipment. Case No. 96-LM-983, 01-L-1668 (Ill. Cir. Ct., Madison County).

10 5. My firm's settlements also include *Conteras v. Bank of America*, where we
11 reached a settlement fund of over \$16.5 million (San Francisco Superior Court, Case No. CGC-
12 07467749, Sept. 3, 2010). In *Nelson v. St. Paul Fire and Marine Insurance Company*, we reached
13 a settlement of \$24.5 million (Case No. 95-G-1088 Brazoria County, Texas, 1996). Further, we
14 settled *Zwart v. John Hancock Mutual Life Insurance Company* for \$3 million (Case No. 673902,
15 San Diego Superior Court, 1995). Other California wage and hour settlements in cases where I
16 was lead counsel include *Friend v. Wellpoint / Blue Shield*, Case No. BC345147 (Los Angeles
17 Super. Ct., Aug. 22, 2007) which settled for \$6 million, and *Gruender v. American Title Co.*,
18 Case No. 06CC0197 (Orange County Superior Court, 2008), which settled for \$11 million.

19 6. More recent wage and hour settlements that my firm has reached include a
20 \$8,000,000 settlement in *XESP v. BF Borgers CPA PC et al.*, Case No. 2024CV030771, District
21 Court of the State of Colorado, finally approved on December 11, 2025; a \$11,000,000 settlement
22 in *Robertson v. Amazon*, Case No., 3:14-md-2504-DJH, United States District Court for the
23 Western District of Kentucky, finally approved on December 23, 2024; a \$11,500,000 settlement
24 in *Harrison v. Bank of America*, Case No. 3:19-cv-00316-LB, United States District Court for the
25 Northern District of California, finally approved on November 24, 2021; a \$4,600,000 settlement
26 in *Vasquez v. Bank of America*, Case No. CGC-18-571669, San Francisco Superior Court, finally
27 approved on July 29, 2022; a \$1,200,000 settlement in *Townsend v. Maxim*, Case No. 22-CV-
28 005450, Alameda Superior Court, finally approved on December 4, 2025; an average settlement

1 share of over \$2,000 per employee in *Young v. PFT Alexander*, Case No. 23STCV07449, Los
2 Angeles Superior Court, finally approved on March 25, 2026; a \$665,000 settlement in *Gibson v.*
3 *Ross*, Case No. 23CV048864, Alameda Superior Court, finally approved on December 12, 2025;
4 a \$1,375,000 settlement in *Diaz et al. v. United Parcel Service, Inc.*, United States District Court
5 for the Eastern District of California, Case No. 1:22-cv-00246-CDB, finally approved on
6 December 13, 2023; a \$24,000,000 global settlement in *Esteban v. American Airlines*, Case No.
7 20STCV47361, Los Angeles Superior Court, finally approved on April 26, 2024; a \$2,000,000
8 settlement in *Stewart v. Del Monte*, Case No. 1:22-CV-04919-RMI, United States District Court
9 for the Northern District of California, finally approved on May 29, 2024; a \$2,900,000
10 settlement in *Swayzer et al. v. Circle K*, Case No. 34-2018-00234999, Sacramento Superior
11 Court, finally approved on February 18, 2022; a \$1,000,000 settlement in *Scott v. Sutter*, Case
12 No. CVUJ-2022-1146, Del Norte Superior Court, finally approved on April 25, 2025; a \$775,000
13 settlement in *Ward v. Sutter*, Case No. 34-2020-00279954-CU-OE-GDS, Sacramento Superior
14 Court, finally approved on January 10, 2025; a \$ 975,000 settlement in *Shaw v. Kaiser*
15 *Foundation Health Plan, Inc.*, Case No. CVRI2102203, Riverside Superior Court, finally
16 approved on January 10, 2024; a \$750,000 settlement in *Almanzar v. Home Depot U.S.A., Inc.*,
17 Case No. 2:20-cv-00699-KJN, United States District Court for the Eastern District of California,
18 finally approved on January 3, 2024; a \$750,000 settlement in *Delamora, et al. v. Thorpe Design*
19 *, Inc.*, Case No. C22-00931, Contra Costa Superior Court, finally approved on October 2, 2023; a
20 \$800,000 settlement in *Slaughter v. California C.C.S. P.C., dba Wellpath*, Case No.
21 CIVDS1935187, San Bernardino Superior Court, finally approved on May 6, 2022; a \$750,000
22 settlement in *Antenucci v. Bank of the West*, Case No. CGC-20-583746, San Francisco Superior
23 Court, finally approved on December 7, 2022, a \$1,000,000 settlement in *Kelly v. Simco*
24 *Electronics*, Case No. 20CV370177, Santa Clara Superior Court, finally approved on January 19,
25 2022; a \$5,900,000 settlement in *Hurtubise v. Sutter East Bay Hospitals*, Case No. RG17868819,
26 Sacramento Superior Court, finally approved on December 27, 2021; a \$825,000 settlement in
27 *Fritsch et al. v. Swift Transportation Co.*, Case No. 5:17-cv-02226-VAP-KKx, United States
28 District Court for the Central District of California, finally approved on January 4, 2022; a \$1.62

1 million PAGA-only Settlement in *Moreno, et al. v. Habit Employment, LP, et al.*, Case No. 37-
2 2019-00014576-CU-OE-CTL, San Diego Superior Court, approved on September 10, 2021; a
3 \$2,295,000 settlement in *Veramendi v. Airtouch Cellular Inc., et al.*, Case No. BC647309, Los
4 Angeles Superior Court, finally approved on June 3, 2021; a \$438,000 settlement in *Valdez v. Pro*
5 *Unlimited, Inc., et al.*, Case No. CGC-19-574146, San Francisco Superior Court, finally approved
6 on May 10, 2021, an average settlement share of \$5,511.11 per employee in *Hopstein v. Hewlett*
7 *Packard Enterprise Company (d.b.a. HPE), et al.*, Case No. 17CV305577, Santa Clara Superior
8 Court, finally approved on December 2, 2020; an average settlement share of \$1,139.71 per
9 employee in *Cuevas v. Three Rivers Trucking, Inc.*, Case No. BC655003, Los Angeles Superior
10 Court, finally approved on July 29, 2020; a \$1.2 million class and PAGA representative action
11 settlement in *Hernandez et al. v. SFM, LLC*, Case No. 37-2016-00015169, San Diego Superior
12 Court, finally approved on July 21, 2020 (aff'd March 16, 2022); \$8.7 million settlement in
13 *Evans v. Wal-Mart Stores, Inc.*, Case No. 2:10-cv-1224, United States District Court for the
14 District of Nevada, finally approved on July 8, 2020 (Dkt. No. 135); \$35 million settlement in
15 *Merino v. Wells Fargo*, Case No. 2:16-cv-07840-ES-MA, United States District Court for the
16 District of New Jersey, finally approved on January 15, 2020 (Dkt. No. 144); an average
17 settlement share of \$1,317.31 per employee in *Angala v. Kaiser Foundation Hospitals*, Case No.
18 HG18899291, Alameda County Superior Court, finally approved on January 13, 2020; \$600,000
19 settlement in *Hoover v. Sedgwick Claims Management Services, Inc.*, Case No. 34-2018-
20 00239159, Sacramento Superior Court, finally approved on December 6, 2019; \$950,000
21 settlement in *Bessellieu v. Metro Shore Services, LLC, et al.*, Case No. BC6737001, Los Angeles
22 Superior Court, finally approved on May 21, 2019; \$1.6 million settlement in *Jenkins v. The*
23 *Mentor Network, Inc., et al.*, Case No. 34-2015-00187936, Sacramento Superior Court, finally
24 approved on September 13, 2018; \$27.5 million settlement in *Wells Fargo Wage and Hour*
25 *Cases*, Case No. JCCP004821, Alameda County Superior Court, finally approved on March 28,
26 2018; \$2.5 million settlement in *Geilenfeldt v. EDF Renewable Energy, Inc.*, Case No. 37-2016-
27 00001369, San Diego Superior Court, finally approved on March 9, 2018; \$3 million settlement
28 in *Vangsoulatda v. Blue Shield*, Case No. CGC-14-543296, San Francisco County Superior

1 Court, finally approved on January 25, 2018; \$650,000 settlement in *McCarthy v. Marriott Hotel*
2 *Services, Inc.*, Case No. 16-cv-293998, Santa Clara Superior Court, finally approved on October
3 16, 2017; \$4.9 million settlement for insurance adjusters in *Alvarez v. Farmers*, case number
4 3:14-cv-00574-WHO, finally approved on January 18, 2017 by Judge Orrick (Dkt. No. 189);
5 \$3.77 million settlement for California warehouse workers in *Saldana v. Amazon*, case number
6 3:14-cv-00290-DJH (W.D. Ky.), finally approved on October 31, 2016 (Dkt. No. 228).

7 7. My other California wage and hour settlements also resulted in substantial
8 recoveries for class members. For instance, I settled *Kogok v. T-Mobile USA, Inc.*, Case No. 37-
9 2012-00076945 (San Diego Super. Ct. Jan. 2015) for \$2,750,000; *Johnson v. Metlife Ins. Co.*,
10 Case No. 13-cv-128-JLS-RNB (C.D. Cal. Mar. 19, 2015) for \$1,970,000; *Erickson v. Old*
11 *Republic Title Company*, Case No. 13-cv-1210-NLS, (S.D. Cal. Feb. 10, 2016) for \$970,000 plus
12 payroll taxes; *Campagna et al. v. Language Line Services, Inc.*, Case No. 30-2012-00578934-
13 CU-OE-CXC (Orange County Superior Court, Mar. 14, 2014) for \$900,000; *Anderson et al. v.*
14 *Oracle Corp.*, Case No. CIV469916/JCCP No. 4597 (Alameda Super. Ct., June 2013) for
15 \$850,000; *McDonagh v. Harrah's Las Vegas, Inc., et al.*, Case No. 13-cv-01744 (United States
16 District Court for the District of Nevada, Dec. 13, 2016), for \$850,000.

17 8. I have also been counsel and argued numerous appellate cases in the California
18 Supreme Court and Courts of Appeal, as well as the Ninth Circuit. Among the published
19 decisions from these cases are: *Daniels v. Philip Morris*, 18 F.Supp.2d 1110 (S.D. Cal. 1998);
20 *Washington Mutual Bank v. Super. Ct.*, 24 Cal.4th 906 (2001); *Northwest Mortgage Inc. v. Super.*
21 *Ct.*, 72 Cal.App. 4th 214 (1999); *Taiheiyo Cement Corp. v. Super. Ct.*, 105 Cal.App. 4th 398
22 (2003); *Ramos v. Countrywide Home Loans*, 82 Cal.App.4th 615 (2000); *In re Tobacco II*, 123
23 Cal.App.4th 617 (2004); *In re Steroid Hormone Prod. Cases*, 181 Cal.App.4th 145 (2010).

24 9. In total, I have prosecuted over 250 wage-and-hour class actions.

25 10. Any attorneys' fees awarded in this matter will be allocated 50.34% to Cohelan
26 Khoury & Singer, 33.33% to United Employees Law Group, and 16.33% to the Markham Law
27 Firm. Our client has consented to this fee allocation in writing.

28

1 11. My firm has prosecuted this litigation solely on a contingent-fee basis, and has
2 been completely at risk that it would not receive any compensation for prosecuting claims against
3 the Defendant.

4 12. The Markham Law Firm's billing for time and costs in this case includes time
5 billed for investigating the claims and drafting pleadings, law and motion practice, attending
6 mediation, taking and attending depositions, reviewing documents and researching legal
7 authorities, and extensive communications and meetings among the parties and counsel. This
8 billing has been prepared from contemporaneous time and bookkeeping records, attached as
9 **Exhibit 1.**

10 13. At the Markham Law Firm, the usual and customarily charged rates of attorneys
11 are: David R. Markham, \$815, Lisa Brevard, \$500, and \$175 for the firm's paralegals. These
12 rates are consistent with the prevailing rates for attorneys of similar experience, skill and
13 reputation, are in line with the market rates in various California legal communities, and were
14 recently approved by several California state and federal courts, including on March 25, 2026 by
15 the Los Angeles Superior Court in *Young v. PFT Alexander*, Case No. 23STCV07449; on
16 December 4, 2025 by the Alameda Superior Court in *Townsend v. Maxim*, Case No. 22-CV-
17 005450; on December 12, 2025 by the Alameda Superior Court in *Gibson v. Ross*, Case No.
18 23CV048864; on April 25, 2025 by the Del Norte Superior Court in *Scott v. Sutter*, Case No.
19 CVUJ-2022-1146¹; on January 10, 2025 by the Sacramento Superior Court in *Ward v. Sutter*,
20 Case No. 34-2020-00279954-CU-OE-GDS, on October 2, 2023, by the Contra Costa Superior
21 Court in *Delamora, et al. v. Thorpe Design, Inc.*, Case No. C22-00931; on December 7, 2022, by
22 San Francisco Superior Court in *Antenucci v. Bank of the West*, Case No. CGC-20-583746; on
23 July 29, 2022, by San Francisco Superior Court in *Vasquez v. Bank of America*, Case No. CGC-
24 18-571669; on May 26, 2022 by Fresno Superior Court in *Moya v. St. Agnes Medical Center*,
25 Case No. 20CECG00975; on May 6, 2022 by San Bernardino Superior Court in *Slaughter v.*
26 *California CCS, P.C.*, Case No. CIVDS1935187; on January 19, 2022 by Santa Clara Superior
27 Court in *Kelly v. Simco*, Case No. 20CV370177; on January 4, 2022 by the United States District
28

¹ The rate for Ms. Brevard has increased from \$400 to \$500 as an attorney with 7 years of experience in wage and hour class actions.

1 Court for the Central District of California in *Fritsch et al. v. Swift Transportation Co. of*
2 *Arizona*, Case No. 5:17-cv-02226-VAP-KKx; on December 27, 2021 by Sacramento Superior
3 Court in *Hurtubise v. Sutter*, Case No. RG17868819; on November 24, 2021 by the United States
4 District Court for the Northern District of California in *Harrison v. Bank of America*, Case No.
5 3:19-cv-00316-LB; and on September 10, 2021 by San Diego Superior Court in *Moreno, et al. v.*
6 *Habit Employment, LP, et al*, Case No. 37-2019-00014576-CU-OE-CTL.

7 14. I have devoted 18.5 hours to the prosecution of this action. We will also incur
8 additional billable time to prepare for and attend the settlement approval hearing, and oversee the
9 settlement administration.

10 15. My former partner, Maggie Realin, devoted 29.8 hours to the prosecution of this
11 action while at my firm.

12 16. My firm's associate, Lisa Brevard, devoted 131.6 hours to the prosecution of this
13 action. Ms. Brevard is a graduate of the University of California, Los Angeles, and University of
14 San Diego School of Law. She received her J.D., summa cum laude, and was admitted to the
15 California Bar in 2018. During law school, Ms. Brevard interned at the USD Appellate Clinic,
16 where she presented oral argument before the Ninth Circuit Court of Appeals. She was an active
17 participant on the University of San Diego Appellate Moot Court Board and competed in regional
18 and national competitions. Additionally, she gained legal experience on corporate and litigation
19 matters as a law clerk and summer associate for a national firm. Since joining my firm in May
20 2019, Ms. Brevard has focused on representing employees in wage and hour class actions.

21 17. My firm's paralegal (and former paralegal during the time that she was employed
22 at my firm), meet the qualifications and continuing education requirements set forth in Business
23 & Professions Code § 6450. My firm's paralegals collectively spent 82.7 hours on this action.

24 18. To prosecute this action, my firm incurred \$9,881.27 in costs. These costs and
25 expenses identified in my firm's costs summary are reflected in the accounting books and records
26 that my law firm maintains in the ordinary course of business, and are prepared from expense
27 records, credit card receipts and statements, and check records. These expenses were necessary
28 for this litigation and include the amounts paid for court filing fees, mediator fees, deposition

1 fees, and service of process charges, all of which are costs normally billed to and paid by the
2 client. These costs were reasonably incurred in the prosecution of this matter and are authorized
3 by the Settlement Agreement.

4 19. I have no conflicts of interest with the aggrieved employees in this action. I am
5 not related to the named Plaintiff. I have not previously represented Defendant in any matter.

6 20. The Settlement Agreement in this action is the result of vigorous and competent
7 representation of Plaintiff, and arms'-length, contentious negotiations with Defendant to reach the
8 best possible outcome for the aggrieved employees and LWDA. Having analyzed the facts and
9 legal theories of this case, and based on my experience in litigating similar representative wage
10 and hour claims, I believe that the proposed settlement is fair, reasonable and adequate for the
11 aggrieved employees and the LWDA.

12 I declare under penalty of perjury under the laws of California and the United States of
13 America that the foregoing is true and correct to the best of my knowledge.

14 Executed on June 12, 2026, in San Diego, California.

15
16 By:  _____

17 David R. Markham
18 Attorney for Plaintiff
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Exhibit 1

THE MARKHAM LAW FIRM
Reported Hours, Lodestar, and Costs

NAME	POSITION	TOTAL HOURS	HOURLY RATE	LODESTAR
ATTORNEYS				
David R. Markham	P	18.5	\$815.00	\$15,077.50
Maggie K. Realin	P	29.8	\$700.00	\$20,860.00
Lisa R. Brevard	A	131.6	\$500.00	\$65,800.00
ATTORNEY TOTAL:		179.9		\$101,737.50

PARALEGALS

Leeanna D. Carcione	PL	54.3	\$175.00	\$9,502.50
Noor Haleem	PL	28.4	\$175.00	\$4,970.00
PARALEGAL TOTAL:		82.7		\$14,472.50
GRAND TOTAL:		262.6		\$116,210.00

(P) Partner

(A) Associate

(PL) Paralegal

Expense Charges	\$9,881.27
Subtotal:	\$9,881.27
TOTAL:	\$9,881.27

Bravo.v. OptumCare Management, LLC et al.; Case No. 22STCV12240

Date	Service	Description	Amount
2/2/2022	LWDA	PAGA Filing Fee	\$ 75.00
2/2/2022	Postage	fee to certified mail PAGA letter	\$ 32.84
4/12/2022	One Legal	Credit Card Sale_03993056	\$ 1,494.53
4/14/2022	One Legal	Credit Card Sale_04001059	\$ 17.19
4/15/2022	One Legal	Credit Card Sale_04002693	\$ 41.18
5/18/2022	Doc Fee	fee to download answer to complaint	\$ 6.60
5/26/2022	One Legal	Credit Card Sale_04104516	\$ 8.24
5/27/2022	One Legal	Credit Card Sale_04105749	\$ 25.43
6/9/2022	One Legal	Credit Card Sale_04134579	\$ 26.46
8/1/2022	One Legal	Refund of Complex Fee	\$ (1,029.50)
9/21/2022	One Legal	Credit Card Sale_04387413	\$ 47.05
9/22/2022	One Legal	Credit Card Sale_04389809	\$ 42.72
1/9/2023	One Legal	Invoice #14250025	\$ 46.02
1/10/2023	One Legal	Credit Card Sale_04661300	\$ 42.72
2/8/2023	One Legal	Credit Card Sale_04739792	\$ 21.57
2/9/2023	One Legal	Invoice# 14327805	\$ 13.33
2/9/2023	One Legal	Credit Card Sale_04740936	\$ 25.89
4/13/2023	One Legal	Credit Card Sale_04905825	\$ 48.54
5/12/2023	One Legal	Credit Card Sale_04985838	\$ 27.95
5/18/2023	Postage	fee to mail amended PAGA letter	\$ 33.36
7/26/2023	One Legal	Credit Card Sale_05177267 (002)	\$ 465.49
7/26/2023	One Legal	Credit Card Sale_05177841	\$ 17.66
8/24/2023	One Legal	Credit Card Sale_05259281	\$ 17.66
10/16/2023	One Legal	Credit Card Sale_05410645	\$ 26.92
11/8/2023	One Legal	Credit Card Sale_05478497	\$ 27.95
1/31/2024	Aptus Court Reporting	Fee for Plaintiff Depo Transcript	\$ 2,038.68
2/15/2024	One Legal	Credit Card Sale_05743973	\$ 51.48
2/15/2024	One Legal	E-Serve Charge 13 recipients -22240853-R1	\$ 13.00
2/16/2024	One Legal	Credit Card Sale_05746742	\$ 15.39
2/21/2024	One Legal	Credit Card Sale_05752026	\$ 40.30
2/23/2024	One Legal	Credit Card Sale_05761507	\$ 10.30
2/26/2024	Doc Fee	fee to pull order granting stip	\$ 5.00
2/26/2024	One Legal	Credit Card Sale_05766824	\$ 15.39

2/26/2024 One Legal	Credit Card Sale_05767018	\$	19.71
2/26/2024 One Legal	Credit Card Sale_05767145	\$	19.71
2/26/2024 One Legal	E-Serve Charge 13 recipients -22313184-R1	\$	13.00
2/26/2024 One Legal	E-Serve Charge 13 recipients -22313475-R1	\$	13.00
2/26/2024 One Legal	E-Serve Charge 12 recipients -22314570-R1	\$	12.00
4/2/2024 Postage	fee to mail letters to employees	\$	60.80
4/17/2024 One Legal	Credit Card Sale_05925462	\$	10.30
5/1/2024 One Legal	Case Management Statement Fee	\$	30.01
5/23/2024 One Legal	Notice	\$	27.95
5/23/2024 One Legal	Notice	\$	27.95
8/22/2024 Register of Actions	Download Stip and Order	\$	6.20
10/8/2024 Register of Actions	Download complaint, notice of ruling, and stip for all related cases	\$	44.80
10/24/2024 One Legal	Filing of notice of status conference and trial dates	\$	31.70
12/9/2024 One Legal	Filing & serving of notice	\$	9.29
1/13/2025 Steno	Depo - Valerie Grosjean - PMK	\$	1,386.80
4/28/2025 One Legal	Request for Production Service	\$	10.33
5/8/2025 Steno	Transcripts and reporter appearance	\$	1,186.70
10/2/2025 Mediation	Mediation Fee for DT	\$	2,587.50
10/31/2025 Meal	Lunch meeting re case	\$	69.29
11/18/2025 One Legal	Filing fee for stipulation and order	\$	61.95
11/18/2025 One Legal	Courtesy copy for stip and order	\$	53.38
1/13/2026 One Legal	Filing of Stip on OSC	\$	54.54
1/21/2026 One Legal	Filing of declaration	\$	87.35
1/21/2026 One Legal	Stip to vacate OSC filing	\$	55.58
3/18/2026 One Legal	File and e-serve fee for status report for case one	\$	55.58
3/18/2026 One Legal	File and e-serve fee for status report for case two	\$	53.51
est. One Legal	File & e-serve status reports for June CMC	\$	100.00
		\$	9,881.27

David Markham, Esq., Founding Partner (\$815/hr; admitted 1976)

Date	Task	Time
10/13/2021	Call w/ MR, LB, Anthony & prospective client	0.8
10/14/2021	Review emails; arbitration agreement	0.1
6/29/2022	Review emails re plaintiff's discovery responses	0.1
7/12/2022	Emails w/ defense	0.1
7/22/2022	Emails w/ LB re mediation	0.1
8/2/2022	Review emails w/ defense counsel re status	0.1
10/3/2022	Emails w/ LB & MR re opening demand	0.2
11/9/2022	Emails w/ defense & LB	0.1
12/1/2022	Email from defense; emails w/ MR & LB	0.1
5/17/2023	Review updated PAGA letter	0.1
5/18/2023	Review email from defense; amended PAGA letter	0.1
6/15/2023	Review email w/ defense counsel re meet & confer	0.1
7/25/2023	Review new complaint; emails w/ MR/LB	0.2
9/21/2023	Review defendant's answer to complaint	0.1
10/4/2023	Review emails w/ defense re Belaire & stip; client depo	0.1
10/4/2023	Review emails re Belaire notice & plaintiff depo	0.1
10/19/2023	Review emails w/ co-counsel & client	0.1
11/15/2023	Review emails w/ defense counsel	0.1
3/1/2024	Review completed employee interview	0.1
4/3/2024	Emails w/ LB re JPA; review same	0.1
4/17/2024	Call w/ LB re depo notice	0.2
4/17/2024	Review release from CM & emails from MR	0.1
4/27/2024	Email to LB	0.1
4/30/2024	Email; call w/ LB re JPA	0.1
5/1/2024	Review CMC statement; emails	0.2
6/19/2024	Emails w/ defense; email w/ LB	0.1
6/25/2024	Review emails w/ defense counsel; emails w/ LB	0.2
7/16/2024	Emails w/ LB	0.1
7/23/2024	Review stip to continue trial date; emails w/ LB & CKS	0.2
9/24/2024	Call w/ LB and review email from co-counsel re related cases	0.3
9/28/2024	Review prospective case & prior filed cases; emails w/ LB	0.1
12/9/2024	Calls w/ LB; email w/ LB re employee count; messages	0.2
12/10/2024	Emails w/ LB re PMK depo	0.1
12/11/2024	Emails w/ LB re deposition	0.1

12/16/2024	Review objection notice & discovery production	0.1
12/17/2024	Review email from court reporter	0.1
12/17/2024	Review newest discovery production; emails	0.5
12/17/2024	Call w/ LB re settlement communication & PMK depo	0.1
12/18/2024	Review PMQ depo outline; emails re same	0.7
12/18/2024	Calls w/ LB re depo	0.2
1/16/2025	Emails w/ MR & LB re CMC statement	0.2
1/17/2025	Review defense edits to statement	0.1
2/26/2025	Calls w/ MR & LB re status of discovery/case; emails w/ defense	0.2
3/6/2025	Meeting with LB re plan for depositions	0.1
4/21/2025	Review PMQ depo outline; emails re same	0.5
5/14/2025	Emails w/ LB re mediator list	0.1
5/16/2025	Emails re discovery	0.1
8/5/2025	Email w/ LB re mediation	0.1
9/22/2025	Emails re mediation	0.2
1/15/2026	Review mediation brief	0.2
1/20/2026	Review email from LB re penalties model	0.1
1/23/2026	Review minute orders issued in case	0.1
1/23/2026	Emails w/ co-counsel re mediation; call w/ LB re mediation	0.4
1/26/2026	Prepare for mediation	1
1/26/2026	Attend mediation (9:30am-4pm)	7.5
6/8/2026	Review DRM dec	0.4
est.	Review final approval papers	0.5
	Total	18.5

Maggie Realin, Esq., Former Partner (\$700/hr; admitted 2009)

Date	Task	Time
10/13/2021	call with prospective client re claims	0.7
10/13/2021	review prospective client's pay stub and employer information	0.6
11/8/2021	Legal research re claims	1.8
4/8/2022	review email to client re complaint	0.1
4/8/2022	review and edit PAGA complaint	0.6
4/11/2022	review and edit case initiating documents	0.4
4/11/2022	review final version of case initiating documents	0.1
4/25/2022	review email from defense counsel re case, email exchange with LB re same	0.2
4/29/2022	call with defense counsel re case claims	0.3
4/29/2022	prepare for call with defense counsel to discuss case	0.5
5/23/2022	review order re non-complex designation; email exchange with LB	0.3
5/26/2022	review discovery requests, email to LB	0.5
5/26/2022	email exchange with LB re discovery requests	0.2
5/31/2022	review D's notice of deposition of P	0.2
5/31/2022	review D's discovery requests	0.4
5/31/2022	email exchange with LB re discovery requests and deposition	0.1
6/8/2022	review cases status	0.2
6/9/2022	review notice of order re reassignment	0.1
6/10/2022	review request for refund of complex fee	0.1
6/15/2022	review Viking decision, research re implications; call with LB and DRM	2.9
6/20/2022	review email from client re discovery and deposition	0.1
6/27/2022	review order re CMC	0.3
6/27/2022	email exchange with LB re meet and confer re CMC	0.2
6/28/2022	review and edit P's responses to RPDs, set 1	1.4
6/28/2022	call and email exchange with LB re discovery	0.4
6/28/2022	call with defense counsel and LB re mediation	0.2
6/29/2022	review and edit P's responses to RPDs, set 1, cont'd	0.8
7/11/2022	review LB's email to defense re mediation	0.1
7/12/2022	review email from counsel re mediation	0.1
9/14/2022	call with defense and LB re case status and potential mediation	0.5
9/15/2022	review stip to continue CMC	0.2
9/19/2022	review and edit joint CMC statement	0.2
10/3/2022	email exchange with DRM and LB re opening settlement demand	0.3
12/7/2022	review new case law re PAGA actions	0.6
1/25/2023	email exchange with defense counsel re cmc statement	0.1
1/31/2023	review and edit CMC statement and form	0.6
1/31/2023	review rules re CMC statement	0.2
2/1/2023	review CMC statement and the form version	0.3
2/1/2023	email CMC statement to defense counsel	0.1
2/8/2023	review D's edits to joint CMC statement; email exchange with LB	0.3
2/8/2023	review LB's further edits to CMC statement	0.1
2/21/2023	call with LB re claims	0.1
3/21/2023	review and edit protective order	0.7
4/18/2023	review email exchange among counsel re Belaire and class data	0.2
5/16/2023	call with LB re case status and strategy	0.2
6/21/2023	email exchange with LB re meet and confer re CMC	0.2
9/19/2023	call with defense and LB re discovery and potential mediation	0.2

9/19/2023	call with LB re status of the case and next steps	0.2
10/16/2023	review D's edits to Belaire notice, email exchange with LB re same	0.3
10/16/2023	review notice of related cases	0.1
10/19/2023	review emails from LB re case status	0.2
11/7/2023	review P's depo notice	0.1
11/28/2023	call with client and LB re depo prep	1
1/24/2024	review case status, email to LB	0.2
1/25/2024	call with defense counsel and LB re mediation and discovery	0.2
1/25/2024	call with client and LB re depo prep	0.4
1/25/2024	review produced documents re job description	0.7
1/26/2024	appear at CMC	0.8
1/26/2024	prepare for cmc	1.1
1/29/2024	email exchange with LB re job descriptions	0.2
1/29/2024	review email from defense re Belaire notice	0.1
1/30/2024	call with defense and LB re Belaire notice, number of employees & mediati	0.2
1/31/2024	attend P's deposition	5
	Total	29.8

Lisa Brevard, Esq., Associate Attorney (\$500/hr; admitted 2018)

Date	Task	Time
10/13/2021	Research re related cases; email MR	0.2
10/13/2021	Call w/ MR, DRM, Anthony & prospective client	0.8
	Prepare minutes for notes from call w/ prospective client & research	
10/13/2021	entity; emails w/ DRM	0.6
10/13/2021	Call w/ MR	0.1
10/14/2021	Review emails; arbitration agreement	0.1
10/29/2021	Review documents from client; email w/ MR	0.1
11/8/2021	Emails w/ MR; review exemption research & case law	0.3
12/20/2021	Emails w/ MR & co-counsel re status of case	0.1
12/21/2021	Call w/ MR re next steps	0.1
1/14/2022	Call w/ MR & review notes	0.1
1/27/2022	Review PAGA letter w/ MR edits	0.2
1/27/2022	Review email from client; emails	0.1
2/2/2022	Review emails re submitting PAGA letter	0.1
4/8/2022	Review MR edits to draft PAGA complaint; email to client	0.1
4/12/2022	Email re answer D/L; D/L to serve complaint	0.1
4/26/2022	Emails w/ defense re scheduling call	0.1
4/27/2022	Emails w/ defense counsel re scheduling call	0.1
4/29/2022	Review file prior to call w/ defense	0.3
4/29/2022	Call w/ MR & defense counsel	0.3
4/29/2022	Notes from call w/ defense	0.1
5/23/2022	Emails w/ MR re objection to non-complex; check status of prior case	0.3
5/26/2022	Prepare discovery requests; email w/ MR	1.3
5/26/2022	Review notice re non-complex determination	0.1
5/26/2022	Review & edit discovery responses	0.3
5/31/2022	Emails re depo & RPDs; review notice; email re availability	0.1
6/17/2022	Emails w/ MR	0.1
6/20/2022	Review emails w/ client	0.1
6/22/2022	Email defense re discovery	0.1
6/27/2022	Emails re scheduling call; review Order & calendared dates	0.3
	Calls w/ MR; review arb agreement & prepare for call with defense	
6/28/2022	counsel; call re discovery; review emails	1.0
6/28/2022	Call w/ defense & MR; emails w/ defense	0.3
6/28/2022	Call w/ MR after call w/ defense	0.2
6/29/2022	Review emails re plaintiff's discovery responses	0.2
7/11/2022	Email MR; email defense re mediation	0.2
7/12/2022	Emails w/ defense	0.1
7/22/2022	Prepare draft early mediation email to defense; review file; email DRM	0.5
8/2/2022	Emails w/ defense counsel re status	0.2
8/26/2022	Review finalized discovery & serve	0.9
8/26/2022	Calendar/calculate MTC D/L	0.1
8/30/2022	Email defense re data points; status	0.1
9/9/2022	Emails w/ defense re scheduling meet & confer; check Order	0.3
9/9/2022	Emails w/ defense; review discovery & emails	0.2
9/12/2022	Call w/ MR; review emails	0.1
9/15/2022	Email re stipulation to continue CMC	0.1
9/26/2022	Review order & calendared dates	0.1

9/28/2022	Emails w/ defense re MTC D/Ls	0.1
9/29/2022	Review email from defense; email & call w/ MR; review prior settlement	0.3
10/3/2022	Call w/ MR; emails w/ MR & DRM re opening demand	0.5
10/3/2022	Research re entity; further emails	0.2
10/3/2022	Email defense re opening demand	0.2
10/19/2022	Emails w/ defense counsel re settlement demand	0.1
11/9/2022	Emails w/ defense & DRM	0.1
11/29/2022	Emails w/ defense counsel; check dates	0.1
12/1/2022	Email from defense; email MR & DRM	0.1
2/22/2023	Review file for call with client	0.2
2/22/2023	Call w/ client & follow-up call w/ MR	0.3
2/22/2023	Notes from call w/ client	0.1
2/23/2023	Review for CMC	0.2
2/23/2023	Attend CMC	0.8
2/24/2023	Review wage statements & email MR	0.1
3/21/2023	Emails w/ defense counsel re MTC/Belaire	0.2
4/4/2023	Check status of documents; email defense counsel	0.2
4/4/2023	Email expert re data analysis request	0.3
4/12/2023	Email defendant re PO for filing; review final w/ POS	0.2
4/25/2023	Check status of emails w/ defense re data	0.1
5/4/2023	Email defense counsel re stip	0.1
5/11/2023	Review notice of case reassignment for filing	0.1
5/15/2023	Review complaint; emails w/ MR re amendment	0.2
5/16/2023	Call w/ MR re next steps	0.2
	Amend PAGA letter based on new employer & facts; check CA SOS;	
5/17/2023	email MR	0.8
5/17/2023	Email to defense counsel in response to meet & confer	0.2
5/17/2023	Review updated PAGA letter w/ edits; email	0.2
5/18/2023	Email defense counsel re MTC deadline	0.1
5/18/2023	Review email from defense; amended PAGA letter	0.1
5/18/2023	Email defense counsel re MTC deadline	0.1
5/18/2023	Review email from defense; amended PAGA letter	0.1
5/19/2023	Review finalized amended PAGA letter	0.1
6/13/2023	Email defense counsel re meet & confer	0.2
6/15/2023	Email defense counsel re meet & confer	0.1
6/21/2023	Meet & confer call w/ defense re amending complaint	0.3
	Review correspondence; prepare for meet & confer call w/ defense re	
6/21/2023	amending complaint	0.4
6/21/2023	Email MR re meet & confer call w/ defense	0.1
6/21/2023	Call w/ MR re call w/ defense	0.1
7/17/2023	Email defense counsel re status	0.1
7/18/2023	Review email from defense; update calendar & respond	0.3
7/25/2023	Finalize new complaint; email MR/DRM & client	0.9
7/25/2023	Review & finalize case initiating documents	0.2
7/26/2023	Email defense counsel re service; review documents	0.2
7/31/2023	Review NOA/documents; serve on defendant & emails	0.3
8/18/2023	Emails w/ defense counsel	0.1
8/29/2023	Review <i>Belaire</i> bids & status	0.1

9/13/2023	Email defense counsel re scheduling call	0.1
9/15/2023	Review case management order; calendared dates	0.1
9/18/2023	Review CMC order & confirm calendared dates	0.1
9/19/2023	Review status; email MR re conference w/ defense	0.2
9/19/2023	Review file prior to call w/ defense; review notice re CMC	0.5
9/19/2023	Call w/ MR prior to meet & confer call w/ defense	0.2
9/19/2023	Meet & confer call w/ MR & defense counsel	0.3
	Review discovery responses; emails w/ defense/edit Belaire &	
9/19/2023	outstanding discovery	0.7
9/21/2023	Review defendant's answer to complaint	0.1
10/4/2023	Emails w/ defense re Belaire & stip; client depo	0.3
10/4/2023	Emails re Belaire notice & plaintiff depo	0.2
10/12/2023	Review & edit stip; emails w/ MR & defense	1.3
10/19/2023	Call w/ client; email MR & co-counsel	0.6
10/19/2023	Email defense re Belaire	0.1
10/19/2023	Emails w/ co-counsel & client	0.2
10/20/2023	Review documents in email from client; email co-counsel	0.2
10/20/2023	Review order; review timelines for pre-trial D/Ls; calendar	0.3
11/9/2023	Prepare for call w/ defense; review & messages w/ MR	0.4
11/9/2023	Call w/ defense	0.2
11/13/2023	Save call notes; review discovery & draft email to defense	0.2
11/13/2023	Email defense counsel	0.2
11/13/2023	Call w/ MR re call w/ defense	0.1
11/15/2023	Emails w/ defense counsel	0.1
11/28/2023	Review for depo prep call w/ client; call w/ MR	0.3
11/28/2023	Depo prep call w/ client & MR	1
11/28/2023	Review updated policy; emails w/ client	0.2
11/28/2023	Email co-counsel	0.1
12/4/2023	Email defense re depo	0.1
12/6/2023	Email defense re deposition	0.1
12/8/2023	Emails w/ defense & MR re depo	0.2
12/22/2023	Emails w/ defense counsel	0.2
1/1/2024	Review emails extending MTC D/L	0.1
1/3/2024	Emails w/ defense	0.1
1/11/2024	Review finalized CMC statement & POS for filing	0.2
1/24/2024	Emails w/ MR re status; call w/ MR	0.1
	Review & save notes from prior depo prep call w/ client; prep for call;	
1/25/2024	further depo prep w/ client	1.5
1/26/2024	Prepare for & attend CMC	1
1/26/2024	Follow-up call with MR re CMC & email re dates	0.2
1/29/2024	Re-review job descriptions & email defense re proposal	0.2
1/30/2024	Review file & prep for depo; obj.	0.4
1/30/2024	Email client/defense re depo	0.1
1/30/2024	Call & emails w/ defense counsel re Belaire; save notes	0.2
1/31/2024	Prepare for depo	0.8
1/31/2024	Client deposition (10am-5pm)	7
2/2/2024	Prepare stip to relate/reassign cases	0.2
2/2/2024	Prepare stip re relating cases	0.4
2/13/2024	Review proposed stip edits; email MR	0.1

2/14/2024	Review & finalize stip; emails re filing	0.3
2/14/2024	Review & edit mailing notice; email admin	0.2
2/15/2024	Review finalized Belaire notices; calendar D/L & email admin	0.1
2/27/2024	Review employee interview questionnaire	0.2
3/1/2024	Review completed employee interview	0.1
3/5/2024	Emails w/ MR re next steps & mediation	0.1
3/13/2024	Email defense counsel re discovery & MTC	0.1
3/14/2024	Email defense counsel; calendar D/L	0.1
3/18/2024	Prepare discovery email to send to defense; email defense	0.4
3/28/2024	Review Belaire letter; email co-counsel	0.1
4/2/2024	Review & update letter	0.2
4/3/2024	Review JPA; email DRM	0.1
4/5/2024	Review interview notes from employee	0.1
4/5/2024	Emails w/ defense re discovery status	0.1
4/12/2024	Review employee declaration	0.1
4/12/2024	Call w/ MR re discovery & PMK depo notice	0.1
4/16/2024	Draft PMK deposition notice; email MR	2.5
4/16/2024	Review discovery & depo summary	0.2
4/17/2024	Revise PMK notice; email MR	0.2
4/17/2024	Review discovery; MTC deadline	0.1
4/17/2024	Call w/ DRM re depo notice; revise & finalize; email defense	0.4
4/17/2024	Review release from CM & emails from MR	0.1
4/18/2024	Draft CMC statement; email MR	0.4
4/18/2024	Call re interview w/ employee	0.1
4/26/2024	Emails w/ defense counsel re depositions & CMC statement	0.2
4/27/2024	Review email from DRM	0.1
4/30/2024	Email; call w/ DRM re JPA	0.1
5/1/2024	Review defendant's position to CMC statement; emails	0.2
5/2/2024	Review related case email from client (Belaire notice)	0.4
5/6/2024	Emails w/ co-counsel re JPA	0.1
5/6/2024	Emails w/ defense re PMK depo topics	0.2
5/7/2024	Review PMK notice; call w/ defense counsel & MR re notice	0.2
5/8/2024	Check docket re 5/16 CMC	0.1
5/13/2024	Check docket; email re CMC	0.1
5/16/2024	Prepare for CMC	0.7
5/16/2024	Attend CMC	0.4
5/16/2024	Emails re meet & confer	0.3
5/16/2024	Save notes from CMC to file; calendar deadlines; email re D/Ls	0.2
5/19/2024	Save notes from CMC to calendar re meet & confer call	0.1
5/21/2024	Prepare for PMK meet & confer; discovery meet & confer and re stip	0.4
6/4/2024	Review Belaire notice in related case; email MR	0.2
6/6/2024	Email client re Belaire in related action	0.1
6/7/2024	Email client re related action	0.1
6/19/2024	Emails w/ defense; review email from DRM; email MR	0.3
6/25/2024	Emails w/ defense counsel re MTC; email DRM	0.2
7/2/2024	Email defense re PMK deposition	0.1
7/8/2024	Review email from defense re PMK depo	0.1
7/16/2024	Review notice re related case; compl.; emails w/ DRM	0.3
7/22/2024	Review stipulation; email defense counsel re stip & MTC extension	0.2

7/23/2024	Review & edit stip to continue trial date; email DRM & CKS	0.4
8/6/2024	Prepare for call w/ defense counsel; review stip/call w/ MR	0.5
8/22/2024	Review stip & order; email co-counsel	0.2
8/23/2024	Emails w/ defense counsel re discovery/MTC	0.1
8/23/2024	Email client re case update	0.2
9/3/2024	Review stip & order; update calendar; review docket	0.2
9/5/2024	Prep for CMC	0.4
9/5/2024	Attend CMC	0.6
9/5/2024	Notes from CMC; email re future dates; messages w/ MR	0.3
9/6/2024	Review notice re CMC; emails re CMC	0.3
9/10/2024	Review related cases order; email defense	0.2
9/16/2024	Check date for further status conference	0.1
9/23/2024	Email defense counsel re report & PMK depositions	0.2
9/24/2024	Call w/ DRM and review email from co-counsel re related cases	0.3
9/28/2024	Review prospective case & prior filed cases; email DRM	0.1
10/1/2024	Email co-counsel re MTC D/L	0.1
10/23/2024	Review & edit notice re status conference/dates	0.2
10/23/2024	Review calendared dates per minute order	0.1
11/20/2024	Review email from defense; email MR; email defense	0.2
11/27/2024	Email MR & defense re PMK deposition	0.1
12/2/2024	Call w/ MR re depo/scheduling call	0.1
	Prepare for call w/ defense; email MR re notes prior to call; call w/ MR	
12/6/2024	& defense	0.5
	Email re updating PMK depo notice for service today; review & edit	
12/9/2024	final version for service; emails re court reporter	0.8
12/9/2024	Calls w/ DRM; email DRM re employee count; messages	0.2
12/10/2024	Email DRM re PMK depo	0.1
12/11/2024	Email DRM re deposition	0.1
12/16/2024	Review objection notice & discovery production	0.1
12/17/2024	Review email from court reporter	0.1
	Review newest discovery production & notes for PMK depo/flag	
12/17/2024	exhibits	2
12/17/2024	Call w/ DRM re settlement communication & PMK depo	0.1
	Review pl depo transcript & rest of discovery production; notes for PMK	
12/18/2024	depo	1.4
12/18/2024	Draft PMK outline; review & edit exhibits; review & edit PMK outline	6.1
12/18/2024	Calls w/ DRM re depo	0.2
12/19/2024	Prep for PMK depo	1.5
12/19/2024	Take PMK depo; follow-up calls	4
1/2/2025	Email defense counsel re MTC & PMK depositions	0.2
1/16/2025	Prepare CMC statement; email MR & DRM	0.8
1/17/2025	Review defense edits to statement; finalize	0.2
1/24/2025	Email defense counsel re next steps	0.1
1/28/2025	Email re depo transcript	0.1
1/29/2025	Confirm dates per stip & order; email co-counsel	0.2
1/30/2025	Email defense counsel re MTC & discovery	0.1
2/3/2025	Review updated MSJ dates per new rule	0.1
2/26/2025	Calls w/ MR & DRM re status of discovery/case; emails w/ defense	0.4
2/27/2025	Email MR; defense counsel re scheduling call	0.1

3/4/2025	Prepare for call w/ defense counsel	0.1
	Meet & confer call w/ defense counsel and MR; follow-up email to	
3/4/2025	defense	0.4
3/6/2025	Meeting with DRM re plan for depositions	0.1
3/18/2025	Email defense counsel re depositions	0.1
3/19/2025	Emails w/ co-counsel & defense re PMK deposition	0.1
3/20/2025	Email defense counsel re PMK deposition	0.1
3/20/2025	Update deposition notice; email re finalized version	0.2
3/21/2025	Update PMK deposition notice; email re service	0.2
3/31/2025	Email defense counsel re discovery	0.1
4/20/2025	Review & edit prior PMK deposition outline	0.4
4/20/2025	Review prior PMK deposition transcript	0.7
4/20/2025	Review document production (def & client); select & save exhibits	0.8
4/21/2025	Review prior PMK deposition transcript; edit outline	0.5
4/21/2025	Draft PMK deposition outline; email DRM & MR	2.2
4/21/2025	Call re PMK deposition	0.1
4/21/2025	Review plaintiff deposition & summary; edit outline	2
4/22/2025	Finish reviewing plaintiff's deposition transcript	0.5
4/22/2025	Review deposition outline & exhibits to prep	2.5
4/22/2025	Take PMK deposition; follow-up calls	4
	Draft stipulation to continue CMC; email co-counsel & email re	
4/27/2025	discovery plan D/L	0.2
4/27/2025	Draft discovery requests; email co-counsel	0.6
4/28/2025	Email defense re CMC statement; email final discovery	0.2
5/4/2025	Review defendant's edit into CMC statement	0.1
5/7/2025	Call w/ MR re CMC	0.1
5/8/2025	Prepare for & attend CMC	1.5
5/8/2025	Call w/ MR re CMC; follow-up emails	0.3
	Review notice & calendared dates; save notes from CMC; prepare email	
5/12/2025	& email MR/DRM	0.2
5/12/2025	Email MR & defense counsel	0.1
5/13/2025	Emails w/ co-counsel re discovery deadline; check order	0.2
5/14/2025	Email defense counsel re mediation	0.1
5/14/2025	Emails w/ DRM re mediator list	0.1
5/15/2025	Emails re mediator list	0.2
5/16/2025	Emails re discovery	0.1
5/16/2025	Email re discovery D/L	0.1
5/19/2025	Email defense counsel re discovery D/L	0.1
5/28/2025	Email defense counsel re mediation	0.1
6/2/2025	Email defense re MTC & mediation status; review email from defense	0.1
6/4/2025	Update MTC deadline on calendar	0.1
6/4/2025	Email defense counsel re discovery	0.1
6/5/2025	Review email from defense counsel; email defense	0.1
6/18/2025	Email MR re mediators	0.1
7/8/2025	Review stip/order & update case deadlines; check dockets for both cases	0.3
7/31/2025	Confirm all mediation dates calendared; email co-counsel re payment	0.1
8/5/2025	Email DRM re mediation	0.1
9/22/2025	Emails re mediation	0.2

9/30/2025	Emails w/ co-counsel re mediation	0.1
10/6/2025	Review mediation emails	0.1
11/14/2025	Draft stip; email MR	0.6
11/14/2025	Draft stip to continue post-mediation status conference; email co-counsel	0.7
11/17/2025	Email defense counsel re stip to continue CMC; finalize	0.3
11/21/2025	Check docket; email re stip	0.1
	Draft mediation brief; review depo transcripts & notes for incorporating	
1/14/2026	key testimony	2.5
1/14/2026	Calendar updated MTC & discovery deadlines	0.1
1/15/2026	Review transcripts from mediation brief & notes for brief	1.3
1/15/2026	Check docket re dec; email co-counsel	0.2
1/15/2026	Draft mediation brief/review file	0.8
1/16/2026	Draft mediation brief/review file	3.4
1/20/2026	Review & save exhibits to brief; final review brief & email to mediator	1
1/20/2026	Create one-page penalties model to send to defense; email MR & DRM	0.6
1/23/2026	Review minute orders issued in case	0.1
1/23/2026	Emails w/ co-counsel re mediation; call w/ DRM re mediation	0.4
1/26/2026	Attend mediation (9:30am-4pm)	7.5
	Review mediator's proposal; calls w/ co-counsel & mediator; emails re:	
1/28/2026	same	0.6
1/29/2026	Call w/ client	0.2
1/29/2026	Emails re MOU	0.1
1/30/2026	Emails re MOU	0.1
2/3/2026	Review MOU; emails w/ co-counsel re same	0.5
3/3/2026	Review edits to MOU	0.1
3/4/2026	Review defense edits to MOU	0.1
3/9/2026	Review MOU; email MR re edits	0.3
3/10/2026	Email MR re MOU	0.1
3/11/2026	Emails re preparing notice of settlement; review same	0.3
3/11/2026	Review email from defense re MOU	0.1
3/12/2026	Review & edit notices of settlement; email MR and defense re notices	0.9
	Email defense counsel re status report/adding declaration language; re-	
3/16/2026	review prior court order	0.1
	Review defense edits to CMC statements; edit further & email re final	
3/16/2026	for filing	0.3
3/17/2026	Finalize both joint reports for filing w/ defense edits; emails re same	0.4
3/17/2026	Review email from defense re filing	0.1
3/23/2026	Check dockets; email defense re orders continuing CMC	0.3
4/7/2026	Review emails from MR re settlement agreement	0.1
	Review LA settlement guidelines/PAGA settlement & MOU; review/edit	
4/8/2026	settlement agreement; emails w/ MR	0.8
4/20/2026	Review stip & amended complaint; email co-counsel	0.2
5/8/2026	Review PAGA approval motion; email MR re proposed edits	0.3
5/11/2026	Review email from MR re edits to SA	0.1
5/12/2026	Review defense edits to SA; email co-counsel	0.4
5/29/2026	Review email from defense; email MR re SA	0.1
5/29/2026	Email co-counsel re status reports & decs	0.1

	6/1/2026 Email re preparing decs for PAGA approval motion	0.1
	Review emails from defense re PAGA approval motion; email MR re	
	6/1/2026 edits	0.2
	6/1/2026 Review & edit WH declaration; email re same; emails w/ PR	0.3
	6/12/2026 Review & edit DRM dec and exhibit 1	0.5
	6/12/2026 Prepare CMC statements; emails w/ co-counsel & defense	0.8
est	Prepare for PAGA approval hearing; review tentative	2
est	Attend PAGA approval hearing	1.5
	Total	131.6

Leeanna Carcione, Paralegal (\$175/hr)

Date	Task	Time
10/13/2021	save paystub to file	0.1
10/29/2021	save client docs to file	0.1
11/9/2021	Apply DRM signature to rep agreement; email to co-counsel	0.2
1/26/2022	draft PAGA letter	0.3
1/27/2022	Review edits to PAGA letter; email to client for review	0.6
2/2/2022	Email to MKR and LRB re PAGA letter not submitted	0.1
2/2/2022	finalize and submit to LWDA; calendar deadline to file	0.2
2/2/2022	Go to UPS store to print and mail PAGA letter certified	1
4/7/2022	draft PAGA complaint	2.8
4/8/2022	call with plaintiff	0.2
4/8/2022	call with MKR re venue	0.1
4/8/2022	edit complaint and email to MKR for review	0.5
4/11/2022	call from MKR re filing PAGA complaint	0.1
4/11/2022	text to plaintiff	0.1
4/11/2022	review text from client	0.1
	draft case initiating docs; review service providers for filing in LA	
4/11/2022	superior	0.6
4/11/2022	edit civil cover sheet per MKR	0.4
4/11/2022	call with MKR re civil cover sheet addendum	0.1
4/11/2022	edit civil cover sheet addendum	0.1
4/11/2022	file complaint and case initiating docs; order service of process	0.4
	calculate and calendar deadline to serve complaint; email to LRB re	
4/12/2022	same	0.2
4/12/2022	review service of process order; release	0.1
4/12/2022	save cc of complaint etc to file	0.1
	review email re service; calendar deadline to answer; email to LRB	
4/13/2022	re same	0.1
4/14/2022	save cc of proof of service of summons to file	0.1
5/18/2022	check docket for answer; download and email to LRB	0.2
	draft notice of order for non-complex designation; calendar dates to	
5/23/2022	object; email to LRB	0.2
5/26/2022	review and respond to email from LRB re discovery	0.1
5/26/2022	finalize notice of non-complex designation	0.2
5/26/2022	edit discovery requests to add definitions and instructions	2.3
5/26/2022	edit RFAs to add definitions and instructions	0.3
5/26/2022	finalize discovery requests; serve	0.4
5/26/2022	file and serve notice of non-complex order	0.2
5/27/2022	calculate and calendar d/l for def to respond to discovery request	0.1
5/27/2022	save cc of notice of order to file	0.1
	email memo to plaintiff re discovery requests and deposition; text to	
6/2/2022	plaintiff re same	0.2
6/3/2022	email to DRM re discovery requests	0.1
6/6/2022	save order to file	0.1
6/8/2022	follow up with plaintiff re discovery	0.1
6/9/2022	email to Plaintiff re docs and depo date	0.1
6/9/2022	d/l date to preemptory challenge judge	0.1
6/9/2022	draft notice of reassignment order	0.3

6/9/2022	finalize notice of reassignment	0.1
6/9/2022	file and serve notice of reassignment	0.3
6/10/2022	fill out request for refund	0.2
6/10/2022	edit request for refund	0.1
6/10/2022	file request for refund	0.1
6/10/2022	review request for refund filing accepted	0.1
6/20/2022	email to plaintiff re discovery; text re same	0.1
6/20/2022	Draft discovery responses	2.8
6/20/2022	text exchange with plaintiff re docs	0.1
6/20/2022	receive plaintiff docs; review and save to file	0.1
6/20/2022	review text messages from plaintiff for discovery; save to file	0.2
6/22/2022	continue drafting response to RPD	2.4
6/22/2022	text exchange with plaintiff re documents	0.1
6/23/2022	continue working on discovery responses	1.8
6/24/2022	continue drafting response to RPD	2.6
6/27/2022	confirm dates on calendar	0.1
6/27/2022	save client's docs to file	0.1
6/28/2022	save email to file	0.1
6/28/2022	review responses to RPD; email to MKR for review	0.3
6/28/2022	email from MKR	0.1
6/28/2022	text to P re documents	0.1
6/28/2022	call from MKR re discovery responses and documents of plaintiff	0.5
	review email re documents; text to client re same; email to MKR re	
6/28/2022	same	0.1
6/28/2022	update calendar re d/l for responses	0.1
6/28/2022	further text from P; forward to MKR	0.1
6/28/2022	text to P re status	0.1
6/29/2022	review edits to discovery responses	0.3
6/29/2022	add reminder to calendar re verifications	0.1
6/29/2022	text exchange with plaintiff	0.2
	review email from MKR re objections; review responses further;	
6/29/2022	email to MKR re same	0.1
6/29/2022	receive plaintiff's remaining docs; save to file	0.1
6/29/2022	compile doc production	0.4
6/30/2022	add bates nos to doc production; redact personal information	0.6
6/30/2022	draft POS for doc production; draft verification	0.4
7/20/2022	update calendar re eot to respond to discovery	0.1
8/10/2022	texting/emails with plaintiff re copies of documents; save docs to file	0.2
8/17/2022	review plaintiff's docs; email to MKR and LRB	0.3
8/17/2022	finalize responses; email to plaintiff; email with verification	0.1
8/18/2022	emails with plaintiff	0.2
	save verification and finalize discovery responses; email to LRB and	
8/18/2022	MKR	0.3
8/18/2022	further email to plaintiff	0.2
8/18/2022	review docs sent by plaintiff; edit doc production; save to file	0.6
8/18/2022	further email to plaintiff re case status	0.1
9/9/2022	calendar call	0.1
9/9/2022	edit calendar entry for call	0.1

9/9/2022	save def's discovery responses to file; calendar MTC deadline	0.1
9/13/2022	OCR doc production; work on discovery summary chart	1.3
	review discovery and work on discovery summary chart; bookmark	
9/14/2022	doc production	2.4
9/15/2022	draft stip to continue CMC	0.8
9/21/2022	finalize stip to continue CMC; email to LRB	0.2
9/21/2022	file and serve stip to continue CMC	0.2
9/26/2022	download and save order; calendar dates; email to LRB	0.1
9/26/2022	email signed order to defense	0.1
9/28/2022	calendar EOT to file MTC for Pl and Def	0.1
12/1/2022	update MTC deadlines on calendar	0.1
1/3/2024	Review and respond to email from LRB re CMC statement	0.1
1/3/2024	Draft CMC statement	0.4
	Review email from LRB re edits to CMC statement; further edit;	
1/4/2024	check docket in case	0.6
1/4/2024	Check dockets re statuses	0.2
1/10/2024	Finalize CMC statement with POS	0.2
1/11/2024	File and serve Pl's CMC statement	0.2
1/11/2024	Save conformed CMC statement to file	0.1
1/11/2024	Save Def's CMC statement to file	0.1
1/23/2024	Reserve appearance for LRB	0.1
1/23/2024	Reserve appearance for MKR	0.1
1/24/2024	Calendar call with defense	0.1
1/25/2024	Save doc production	0.1
1/25/2024	Email plaintiff depo link; save to calendar	0.1
2/5/2024	pull minute order in 2802 case; email to LRB	0.1
2/5/2024	check docket	0.1
	review email from co-counsel re service agreement; review CMC	
2/5/2024	statements; email re same	0.2
2/6/2024	save notice of association of counsel and change of firm	0.1
2/6/2024	email MKR template for employee letter	0.1
2/7/2024	sign notice of association and email to co-counsel	0.1
2/8/2024	draft Optum Care discovery requests	0.5
	save transcript to file; download; email to LRB re sending to	
2/12/2024	plaintiff	0.1
2/12/2024	email to plaintiff the transcript to review	0.1
2/13/2024	download video of deposition	0.1
2/14/2024	finalize stip; issues re filing; call with Amber re same	1
2/14/2024	save final belaire notice to file	0.1
2/16/2024	refile stip and order	0.1
2/21/2024	check docket re stip to transfer	0.1
	review and respond to email from LRB re stip to relate; check docket	
2/22/2024	re same	0.2
2/22/2024	finish draft RPD requests; email for review	0.4
2/22/2024	further edits to RPDs draft; email to MKR	0.3
2/23/2024	check docket re stip	0.1
2/23/2024	finalize discovery requests	0.2
2/23/2024	serve discovery requests; calendar responses	0.2
2/23/2024	check docket for order on stip; email LRB re same	0.1

check docket re order on stip to transfer and relate cases; download	
2/26/2024 order; email to LRB	0.3
2/26/2024 draft notice of order; email to LRB	0.3
2/26/2024 further edit to notice of order; email to LRB	0.2
2/26/2024 finalize notice of order	0.2
2/26/2024 email to MKR re RPD1	0.1
2/26/2024 file and serve notices of order relating case	0.4
2/26/2024 re-file notice of order	0.3
2/26/2024 save cc of filings to file	0.1
2/26/2024 draft interview questionnaire	1.1
review and respond to email to MKR with declaration templates;	
2/28/2024 search file for relevant templates	0.2
review and respond to email from Amber re submission of	
3/12/2024 complaints to LWDA; review file re same	0.1
3/12/2024 check case dockets; submit complaints to LWDA	0.4
3/27/2024 download employee list	0.1
4/2/2024 prep employee letter; send to LRB	0.2
edit class letter; mail merge and print letters; stuff envelopes; print	
4/2/2024 stamps	1.5
4/3/2024 finish prepping class letters; take to post office	1.5
4/4/2024 save interview to file	0.1
4/9/2024 review vm from employee	0.1
4/9/2024 review VM from employee	0.1
4/9/2024 review voicemail from employee	0.1
4/10/2024 email DRM re JPA; edit JPA	0.1
4/10/2024 call to employee to interview; calendar call	0.4
4/11/2024 email from Amber re declarant; note on list; text from MKR re same	0.1
4/12/2024 call re decl and interview	0.1
4/12/2024 email exchange with employee re interview; calendar	0.2
4/12/2024 call with employee; vm	0.1
4/15/2024 email employee re interview	0.1
4/15/2024 text to employee re interview	0.1
4/15/2024 call with employee re rescheduling call	0.2
4/15/2024 call with employee re decl	0.4
4/16/2024 email to employee re declaration	0.1
4/17/2024 confirm calendar entry	0.1
4/17/2024 forward email from former EE	0.1
4/17/2024 email to employee re interview	0.1
4/17/2024 finalize PMK notice; serve only; calendar	0.2
4/18/2024 call with employee	1
4/22/2024 review email from employee; update spreadsheet	0.1
4/24/2024 reschedule call with employee; calendar	0.1
4/30/2024 email re JPA	0.1
Total	54.3

Noor Haleem, Paralegal (\$175/hr)

Date	Task	Time
	Review emails from Lisa on upcoming hearing; register attorney	
5/13/2024	on court connect and emails on same	0.2
5/14/2024	Review emails re supplemental discovery	0.1
5/15/2024	Check for tentative rulings and correspondance with Lisa on same	0.1
5/17/2024	Review email re deadline extension; calendar same	0.2
5/22/2024	Receive and save notice of remote appearance	0.1
5/22/2024	Review register of actions and calendar status conference date	0.1
5/22/2024	Draft notice of continued status conference	0.5
	Complete filing and serving for Notice of Status conference and	
5/22/2024	correspondence with Lisa on same	0.2
	Receive, download, review minute order dated may 22, 2024;	
5/29/2024	confirm calendared date	0.2
5/31/2024	Receive and review minute order 05/22/24	0.1
8/1/2024	Research related cases and email to LB on same	0.4
8/13/2024	Review proposed order and save on file	0.1
8/15/2024	Review invoices; correspondence with LB on same	0.2
8/22/2024	Review file; email LB	0.2
8/22/2024	Download stip and order; calendar; email to LB on same	0.4
8/23/2024	Emails with Amber re signed order	0.1
	Review emails re upcoming hearing, call to court clerk on same,	
9/4/2024	correspondence with LB on same. Register attorney for hearing	0.4
	Review register of action and download the min order, and email	
9/5/2024	LB on same	0.2
	Draft Notice of Status Conference and email to LB for review on	
9/6/2024	same, revise, complete filing and serving on same	1.1
9/6/2024	Calendar deadlines from minute order, email to LB on same	0.3
9/9/2024	Receive and save notice of status conference; email to LB on same	0.2
9/24/2024	Calendar motion to compel deadlines and email to LB on same	0.2
9/24/2024	Save research documents in the client file and email to LB on same	0.2
9/30/2024	Review related case register of action and email to LB on same	0.2
10/8/2024	Review and download related cases and email to LB on same	0.5
10/15/2024	Review joint CMS and save on file	0.1
	Save a copy of joint case management statement on file, email to	
10/22/2024	LB on same	0.2
	Draft Notice of Status Conference, download minute order,	
10/23/2024	calendar, email to LB on same	1.2
	Finalize notice of status conference and email to LB on same;	
10/24/2024	complete serving and diling on same	0.4

10/24/2024	Receive and save conformed pleadings of notice of status conference and email a copy to LB on same	0.1
12/9/2024	Call Steno and place a request for court reporter re upcoming depo; draft notice of depo and email to LB on same	1.1
12/16/2024	Receive and download documents for production, save on file, and email to LB on same	0.2
12/18/2024	Compile all exhibits for deposition; correspondence with LB on same	1.2
1/13/2025	Review statement from Steno, download and save on file, add to CS	0.1
1/23/2025	Receive and save stip on file, email a copy to LB on same	0.1
1/29/2025	Receive, review, and download stipulation and order to continue case management conference; calendar new dates, email to LB on confirmation of same	0.2
1/29/2025	Receive and download transcripts for PMK deposition; email to LB on same	0.2
1/30/2025	Email transcripts to co-counsel	0.1
2/6/2025	Calendar pre-trial deadlines, email to LB on confirmation of same	0.3
2/10/2025	Review errata received for Valerie Grosjean deposition and save on file	0.1
2/26/2025	Calendar MTC deadline extension	0.1
2/27/2025	Calendar upcoming conf call	0.1
3/21/2025	Prepare POS for notice of depo, serve via one legal, confirm with LB on same	0.5
3/31/2025	Calendar deadline for discovery	0.1
4/4/2025	Place a court reporter request, email to LB on same	0.2
4/28/2025	Finalize discovery and flatten request for production, serve via one legal	0.2
4/30/2025	Calendar deadline extension for discovery	0.1
5/2/2025	Review and download joint case management conference, email to LB on same	0.1
5/7/2025	Review for tentative ruling, add zoom info on calendar, email to LB on same	0.1
5/9/2025	Receive and review notice of continued status conference, calendar, and email to LB on same	0.3
5/9/2025	Receive, review, and save minute order. Calendar def deadline to produce disc papers	0.1
6/10/2025	Calendar discovery deadline to respond, and save on file	0.2
6/24/2025	Calendar mediation date	0.1
6/30/2025	Receive and save Joint Stip to Vacate	0.1
7/3/2025	Calendar post mediation status conference	0.1
7/8/2025	Calendar dates associated with order continuing trial dates, save on file	0.1
7/18/2025	Complete signature on behalf of DRM, email back to mediator; calendar mediation dates	0.2
10/3/2025	Update calendar with new discovery/MTC date based on attys emails	0.1

	Calendar mediation deadlines on calendar, save notice, email to LB	
10/6/2025	on same	0.2
11/18/2025	Finalize stipulation to continue conf., file and serve	0.2
	Check docket for upcoming CMC, attempt calling clerk, emails	
12/2/2025	with LB on same	0.2
12/3/2025	Email & review tentative ruling and calendar dates	0.2
12/9/2025	Update calendar w/ new mediation dates, save invoice	0.1
1/7/2026	Review email re mediation	0.1
	Finalize stipulation to vacate OSC, file in both cases, serve/emails	
1/12/2026	with LB	0.4
1/14/2026	Save dec of service in pleadings, email to LB on same	0.1
	Call with clerk re status of filed dec and stip; emails with LB on	
1/15/2026	same	0.4
	Calls with clerk re case and OSC conference, correspondence w	
1/20/2026	LB on same	0.4
1/20/2026	Compile exhibits for mediation brief, email to LB on same	0.8
1/20/2026	Check for tentative ruling	0.1
1/21/2026	Review hearing notes, calendar dates, email to LB on same	0.2
1/21/2026	Save Dec of LB on file, email to LB	0.1
1/21/2026	Review min order re stip, save on file	0.1
1/22/2026	Review costs up to date for mediation, email to LB on same	0.2
1/23/2026	Review min order and save on file	0.1
	Draft notice of settlement and request for contin for both cases,	
3/11/2026	email to LB for review on same	2.5
3/17/2026	File and serve joint status reports and stipulations in both cases	0.2
	Receive and calendar new continued date to hearing, email to co-	
3/20/2026	counsel on same	0.2
3/20/2026	Save MOU on file, email to LB on same	0.1
	Receive and save final settlement agreement on file, email w/ LB	
5/21/2026	on same	0.1
	Draft WH and DRM decs, emails w/ LB and co-counsel, further	
6/1/2026	revise, email to LB and DRM on same	6
	File & serve reports; save docs sent by co-counsel, check dockets,	
est.	emails w/ LB on same	0.5
	Total	28.4