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7 *Attorneys for Plaintiffs and the Putative Class*

8 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**

9 **COUNTY OF SAN MATEO**

10
11 **STACEY SERNA and LOURDES DE**
GUZMAN ANGEL, on behalf of the State of
12 California, as private attorneys general,

13 Plaintiffs,

14 v.

15 **GURNICK ACADEMY OF MEDICAL**
16 **ARTS, LLC**, a California Limited Liability
Company,

17
18 Defendant.
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Case No. 22-CIV-01185

**DECLARATION OF JULIAN HAMMOND
IN SUPPORT OF PLAINTIFFS' MOTION
TO APPROVE PAGA SETTLEMENT**

Date: December 14, 2023

Time: 10:00 a.m.

Judge: Hon. Susan L. Greenberg

Dept.: 3

1 I, Julian Hammond, declare as follows:

2 1. I am over the age of 18 and have personal knowledge of the facts set forth in this declaration
3 and could and would testify competently to them.

4 2. I am a member in good standing of the Bar of the State of California. I am licensed to
5 practice before all courts in the State of California. I am also an active member of the Bar of the State of
6 New York and of the Washington State Bar Association.¹

7 3. I am the founding shareholder of the law firm HammondLaw, P.C. ("HammondLaw" or
8 "HL"). Together with my co-counsel, Blumenthal Nordrehaug Bhowmik De Blouw, LLP ("BNBD"),
9 HammondLaw represents Plaintiff Stacey Serna and Lourdes De Guzman Angel ("Plaintiffs") and all
10 "Aggrieved Employees" defined as: all individuals employed by Defendant in California and classified as
11 a non-exempt employee from August 23, 2020 to June 25, 2023 ("PAGA Period"); and all individuals
12 employed by Defendant in California who were required to work remotely from March 18, 2020, to June
13 25, 2023 ("Remote PAGA Period").

14 4. I have no knowledge of the existence of any conflict of interest between PAGA Counsel
15 and Plaintiffs, on the one hand, and any Aggrieved Employee, on the other hand.

16 **PERCENTAGE OF THE FUND ANALYSIS**

17 5. Class Counsel seeks an attorneys' fee award that is one-third of the Gross Settlement.
18 This amount is reasonable considering Class Counsel's extensive experience in wage and hour class
19 actions, the work done by Class Counsel on this case, the manner in which Counsel effectuated this result
20 to ensure prompt payment to the Class by negotiating an excellent Settlement, the risk of non-recovery
21 after substantial investment of time and resources undertaken by Class Counsel, and the continued time
22 and expense that Class Counsel will incur by administering the fair distribution of the settlement fund
23 should this Court grant approval.

24 6. California courts routinely award fees in the amount of 1/3 or more of the common fund
25 in similar wage and hour class actions brought by class counsel including *Brandmeier v Columbia*
26 *Southern University*, Case No. 22CV013638 (Alameda County Superior Court) (August 28, 2023)
27 (approving fees of 1/3 of \$320,000 wage and hour class settlement); *Angelina Harrold v California*
28 *Family Health LLC*, Case No. 34-2022-00323409 (Sacramento County Superior Court) (August 17,
2023) (approving fees of 35% of \$223,000 PAGA settlement); *Carr et al v Konica Minolta Business*
Solutions U.S.A., Inc., Case No. 21CV001245 (Alameda County Superior Court) (June 27, 2023)(

¹ I am also admitted to practice as a Barrister-at-Law in both the New South Wales and Victorian Supreme Courts, located in Australia.

1 approving fees of 1/3 of \$1,247,907.53 class settlement); *Castillo v. Holy Names University*, Case No.
2 HG21097245 (Alameda County Superior Court, May 2, 2023) (approving fees of 1/3 of \$907,701 wage
3 and hour class settlement); *Glor v iHeart Media + Entertainment*, Case No. 22CV005286 (Alameda
4 County Superior Court) (February 14, 2023) (approving fees of 1/3 of \$1,1220,000 wage and hour class
5 settlement); *Cassidy v Keyence Corporation of America*, Case No. 21CV382350 (Santa Clara County
6 Superior Court) (February 8, 2023) (approving fees of a 1/3 of \$300,000 PAGA settlement); *Burleigh v.*
7 *National University*, Case No. MSC21-00939 (Contra Costa Cty. Sup. Ct.) (Aug. 26, 2022) (approving
8 fees of 40% of \$925,000 class settlement); *Costa v University of Antelope Valley*, Case No.
9 21STCV18531 (Los Angeles County Superior Court) (August 23, 2022) (approving fees of a 1/3 of
10 \$150,000 PAGA settlement); *Chindamo v. Chapman University*, Case No. 30-2020-01147814-CU-OE-
11 CXC (Orange County Superior Court) (April 15, 2022) (approving fees of 1/3 of \$1,150,000 wage and
12 hour class settlement); *Sweetland-Gil v. University of the Pacific*, Case No. STK-CV-UOE-2019-
13 0014682 (San Joaquin County Superior Court) (March 4, 2022) (approving fees of 1/3 of \$1,800,000
14 wage and hour class settlement); *Senese v. University of San Diego*, Case No. 37-2019-00047124-CU-
15 OE-CTL (San Diego County Superior Court) (February 8, 2022) (approving fees of 1/3 of \$3,892,750
16 wage and hour class settlement); *Solis et al. v. Concordia University Irvine*, Case No. 30-2019-
17 01114998-CU-OE-CXC (Orange County Superior Court) (February 3, 2022) (approving fees of 1/3 of
18 a \$890,000 wage and hour class settlement); *McCoy et al. v. Legacy Education LLC*, Case No.
19 19STCV2792 (Los Angeles County Superior Court) (November 15, 2021) (approving fees of 1/3 of a
20 \$76,000 wage and hour representative settlement); *Merlan v. Alliant International University*, Case No.
21 37-2019-00064053-CU- OE-CTL (San Diego County Superior Court) (November 2, 2021) (approving
22 fees of 1/3 of a \$711,500 wage and hour class action as “not out of line with class action fee awards
23 calculated using the percentage-of-the-benefit method”); *Stupar et al. v University of La Verne*, Los
24 Angeles Superior Court) (October 14, 2021) (approving fees of 33% in \$2,450,000 wage and hour class
25 settlement); *Normand v. Loyola Marymount University*, Case No. 19STCV17953 (Los Angeles Superior
26 Court) (September 9, 2021) (approving fees of 33% in \$3,400,000 wage and hour class settlement); *Veal*
27 *v Point Loma Nazarene University*, Case No. 37-2019-00064165-CU-OE-CTL (San Diego Superior
28 Court) (August 27, 2021)(approving fees of 33.33% in \$711,000 wage and hour class settlement); *Pillow*
et al. v. Pepperdine University, Case No. 19STCV33162 (Los Angeles Superior Court)(July 28, 2021)
(approving fees of 33% in \$940,000 wage and hour class settlement); *Moore et al. v. Notre Dame De*
Namur University, Case No. 19-CIV-04765 (San Mateo County Superior Court) (July 1, 2021)
(approving fees of 33% in \$882,880 wage and hour class settlement); *Peng v. The President and Board*

of Trustees of Santa Clara College, Case No. 19CV348190 (Santa Clara County Superior Court) (April 21, 2021) (approving fees of 33% in \$1,900,000 wage and hour class settlement); and many other cases.

7. The requested percentage of the distribution is in line with (or lower than) the fee that my firm would have expected if we had negotiated individual retainer agreements with each Class Member. My firm's retainer agreement with each Plaintiff provides for recovery of 1/3 of the class settlement as fees, plus reimbursement of litigation costs and expenses with interest. Such an award ensures that we can receive an appropriate fee for the risks undertaken by our firm and the benefit conferred to the Class, particularly when it would be impossible *ex ante* to enter a fair fee arrangement with all the members of the Class.

LODESTAR-MULTIPLIER ANALYSIS

8. HammondLaw, P.C. has calculated its combined lodestar amount (reasonable hours times reasonable hourly rates) to be \$184,332.50, as follows:

Attorney/Timekeeper	Rate	Hours	Lodestar
Julian Hammond, Principal	\$925	25.5	\$23,588.00
Adrian Barnes, Counsel	\$775	88.4	\$68,510.00
Polina Brandler, Counsel	\$750	6.5	\$4,875.00
Ari Cherniak, Associate	\$650	107.7	\$70,005.00
Melissa Kurata, Attormey	\$650	18.2	\$11,830.00
Steven Greenfield, Associate	\$425	13.0	\$5,525.00
Total		259.30	\$184,332.50

9. I've divided the time my firm spent litigating this case into four phases. Phase I consisted of pre-filing work including pre-filing fact investigation, drafting pleadings, Defendant's Motion for Coordination, and case management conferences. Phase II consisted of discovery and mediation preparation. Phase III consisted of attendance at mediation and negotiations until the settlement agreement had been signed. Phase IV consisted of drafting the instant declaration and compiling time and costs for submitting to the Court.

PHASE I WORK

10. Phase I consisted of pre-filing investigation, drafting pleadings, opposing Defendant's Motion for Coordination, and case management conferences, as follows:

- researching and analyzing Defendant's policies and relevant law to determine the validity of Plaintiff's claims prior to drafting the Complaint;

- reviewing documents and communications provided by Plaintiff and discussing the allegations included in her PAGA Notice and Complaint; obtaining a Right to Sue from the DFEH; and drafting, reviewing and discussing the PAGA Notice, Complaint, and First Amended Complaint;
- reviewing Defendant's Petition for Coordination; drafting an opposition; reviewing Defendant's reply; and attending the remote hearing in Contra Costa County Superior Court;
- reviewing minute orders pertaining to case management conferences, drafting status reports and stipulations, and attending case management conferences.

11. The total time expended by my firm on these tasks was 127.1 hours for a lodestar of \$88,062.50, as follows:

	Hammond	Cherniak	Brandler	Barnes	Kurata	Total
Investigation	2.10	11.50	0.90	-	-	14.50
Pleadings	5.50	31.40	3.80	9.30	2.50	52.50
Coordination	1.80	23.10	1.10	-	15.70	41.70
Hearings	2.60	12.50	0.30	3.00	-	18.40
	12.00	78.50	6.10	12.30	18.20	127.10

PHASE II WORK

12. Phase II consisted of discovery and mediation preparation as follows:

- meeting and conferring with Defendant regarding mediators and mediation dates;
- drafting formal and informal discovery;
- reviewing and analyzing Defendant's production including Faculty Handbooks; sample payroll records; sample time records; a sample employee list; memoranda to staff re: the Covid-19 Pandemic; job descriptions; and, sample offer letters;
- drafting and sending surveys to Aggrieved Employees, reviewing survey responses, and reviewing data and documents obtained from them;
- drafting Plaintiffs' mediation brief with a detailed legal and factual analysis of Plaintiffs' claims, and a detailed damages model based on an analysis of the data;
- discussing the scope of the case and mediation strategy with co-counsel.

13. The total time expended by my firm on these tasks was 88.9 hours for a lodestar of \$66,240 as follows:

	Hammond	Cherniak	Barnes	Total
Formal Discovery	-	1.90	11.40	13.3
Informal Discovery	0.50	13.20	4.60	18.3

Mediation Prep	2.70	10.00	44.60	57.3
	3.20	25.10	60.60	88.9

PHASE III WORK

14. Phase III consisted of the mediation and settlement negotiations as follows:

- preparing the day of the mediation and attending the mediation via Zoom;
- reviewing, editing and finalizing the Settlement Agreement and Class Notice.

15. The total time expended by my firm on these tasks was 28.2 hours for a lodestar of \$23,140 as follows:

	Hammond	Cherniak	Brandler	Barnes	Total
Mediation	9.30	-	-	10.50	19.80
Settlement	1.00	2.00	0.40	5.00	8.40
	10.30	2.00	0.40	15.50	28.20

PHASE IV WORK

16. Phase V consisted of drafting the instant declaration and compiling time and costs for submitting to the Court. The total time expended by my firm on these tasks was 15.1 hours for a lodestar of \$6,890, as follows:

Cherniak	Greenfield	Total
2.1	13.00	15.1

PLAINTIFF COUNSEL'S QUALIFICATIONS AND HOURLY RATES

17. The following paragraphs summarize each attorney's qualifications, some of their principal contributions to the case, and their hourly rate:

Julian Hammond

18. *Qualifications and Experience.* I have been practicing law since 2000. I was admitted as a Solicitor in New South Wales in 2000. In 2002, I was admitted to the New York State Bar, and in 2002 I was admitted as a Barrister in New South Wales. As a Barrister, from approximately 2002 to 2008, I first-chaired four cases and second-chaired at least 10 cases. I also advised high profile institutional clients and advised and represented individuals and groups of individuals in a wide variety of matters, including pharmaceutical product liability, oil-spill, eminent domain and other real estate matters, and breach of contract. Thereafter and for the majority of my career I have represented plaintiffs in employment and consumer cases. From 2008 until 2010, I worked with Ackermann & Tilajef, P.C. in Los Angeles, California where I worked with employees in a number of wage and hour class actions, as well as small groups of clients in sexual discrimination, FMLA discrimination, retaliation and similar cases.

1 19. In 2010 I founded my firm HammondLaw, P.C. Since the founding of my firm, I have been
2 lead or co-lead counsel in over 50 employment and consumer class actions in state and federal courts in
3 California and Washington state. I represented employees across a variety of industries, including outside
4 salespersons in the liquor distribution industry and in the photocopier distribution industry securing
5 settlements against major players in both industries for violations of Labor Code § 2802 and securing
6 significant increases in the amount of money they received for expense reimbursement. I also represented
7 thousands of truck drivers in California, securing settlements and compensation changes going forward
8 against the largest trucking companies in the United States for unpaid wages and premium pay. I have
9 also represented employees who have worked as pet groomers, fitness instructors, adjunct instructors,
10 and account executives and sales employees.

11 20. My firm was also the first firm in the country to bring cases and secure settlements
12 pursuant to the Automatic Renewal Law §§ 17600, *et seq.* (“ARL”) and the UCL. As lead or co-lead
13 counsel we secured the largest settlement thus far under the ARL and UCL in *Siciliano, et al. v. Apple,*
14 *Inc.*, Case No. 1:13-CV-257676 (Santa Clara County Superior Court, November 5, 2018) (\$16,500,000
15 settlement on behalf of approximately 4,000,000 consumers). We also secured settlements under the
16 ARL and the UCL in *Goldman v. Lifelock*, Case No. 1-15-cv-276235 (Santa Clara County Superior Court
17 Feb. 5, 2016) (\$2,500,000 settlement on behalf of approximately 320,000 consumers); *Davis v. Birchbox*
18 *Inc.*, Case No. 3:15-cv-498-BEN-BSG (S.D. Cal. Oct 17, 2016) (settlement in form of Birchbox credits
19 for approximately 150,000 consumers); *Kruger v. Kiwi Crate*, Case No. 1-13-CV-254550 (Santa Clara
20 County Superior Court July 2, 2015)) (claims made settlements on behalf of consumers); and *Gargir v.*
21 *SeaWorld Inc.*, Case No. 37-2015-00008175-CU-MC-CTL (San Diego County Superior Court October
22 21, 2016) (\$500,000 settlement on behalf of 88,000 subscribers).

23 21. Since 2016, my firm has been the leader in prosecuting wage and hour adjunct instructor
24 cases in the state. My firm has successfully recovered at least \$42 million dollars in damages and statutory
25 and civil penalties in twenty-nine class actions. My firm also recently litigated one adjunct class action
26 all the way through to trial in which the Class prevailed on a wage statement claim, and the judgment
27 was recently affirmed on appeal. *See Gola v. University of San Francisco*, 90 Cal. App. 5th 548 (2023).
28 My firm also recently secured victory on an arbitration issue in a consumer case, which was also affirmed
on appeal. *See Fisher v. MoneyGram International*, 66 Cal. App. 5th (2023).

 22. My firm was also on the Executive Committee in the MDL case titled *In re Ashley*
Madison Customer Data Security Breach Litigation, Case No. MDL 2669 (E.D. Mis. Dec. 9, 2015)
(\$11.2 million claims-made settlement on behalf of approximately 39 million Ashley Madison users

1 alleging privacy violations); and is currently co-lead counsel in *In Re Betterhelp, Inc. Data Disclosure*
2 *Cases*, Case No. 23-cv-01033-RS (N.D. Cal. July 24, 2023).

3 23. *Billing Rate.* My current billing rate is \$925 per hour. Based on my knowledge of rates
4 charged by other experienced attorneys involved in complex litigation, I believe that rate to be the
5 prevailing market rates for attorneys of comparable skill and experience in such matters.

6 **Adrian Barnes**

7 24. *Qualifications and Experience.* Mr. Barnes is a recognized employment law and
8 consumer protection attorney, with over 12 years of experience. Since graduating from law school, Mr.
9 Barnes has spent the majority of his career representing the interests of employees and union members
10 in labor and employment cases. Mr. Barnes has represented clients in more than 20 arbitrations, before
11 the PERB, and before the NLRB. Mr. Barnes has also been appointed class counsel in more than 40 class
12 actions brought on behalf of employees and consumers, and has secured settlements totaling at least \$10
13 million.

14 25. Mr. Barnes graduated from the University of California, Berkeley, in 2001, and from
15 Columbia Law School, in 2007, where he was a member of the *Columbia Law Review* and received the
16 Emil Schlesinger Labor Law Prize.

17 26. *Billing Rate.* Mr. Barnes' current billing rate is \$775. Surveys I have reviewed and experts
18 I have consulted demonstrate that this rate is similar to rates charged by comparable attorneys for similar
19 class action work and complex litigation.

20 **Polina Brandler**

21 27. *Qualifications and Experience.* Ms. Brandler's practice has focused on wage and hour
22 and consumer class actions for over a decade. Ms. Brandler has been responsible for all facets of wage
23 and hour actions, from pre-filing investigation, discovery, and motion practice, settlement negotiations,
24 trial, appeal and/or settlement approval. She has been certified as class counsel in more than 45 class
25 actions, including numerous wage and hour cases. She was one of the primary attorneys litigating the
26 *Fisher v. MoneyGram* case, which, as discussed above, resulted in an important victory for consumers
27 on an arbitration issue. Ms. Brandler also second chaired the trial in this case. Prior to joining
28 HammondLaw, Ms. Brandler clerked for the Honorable Anita H. Dymant of the Appellate Division of
the Los Angeles Superior Court from 2009 to 2012. Ms. Brandler received her B.A. in history cum laude
from the Macaulay Honors College at the City University of New York in 2005, and her J.D. from the
Benjamin N. Cardozo School of law in 2009. While in law school, Ms. Brandler was an intern for the

1 Honorable Sandra L. Townes of the Southern District of New York where she assisted in drafting two
2 published decisions.

3 28. *Billing Rate.* Ms. Brandler's current billing rate is \$750 per hour. Surveys I have reviewed
4 and experts I have consulted demonstrate to me that this rate is similar to rates charged by comparable
5 attorneys for similar class action work and complex litigation.

6 **Ari Cherniak**

7 29. *Qualifications and Experience.* Mr. Cherniak has extensive class action litigation
8 experience. Mr. Cherniak's practice has focused on wage and hour employment and consumer class
9 action since 2010, during which time he has been appointed, along with other members of the
10 HammondLaw Team, as class counsel in over 70 class actions. Mr. Cherniak handles all aspects of
11 litigation, including drafting pleadings, motions/oppositions, briefs, and discovery, and brings to our team
12 an extensive knowledge of procedural requirements. He received his B.S. in Philosophy cum laude from
13 Towson University in 2007, and his J.D. from Tulane Law School in 2011.

14 30. *Billing Rate.* Mr. Cherniak's current billing rate is \$650 per hour. Surveys I have
15 reviewed and experts I have consulted demonstrate to me that this rate is similar to rates charged by
16 comparable attorneys for similar class action work and complex litigation.

17 **Melissa Kurata**

18 31. *Qualifications and Experience.* Ms. Kurata graduated from Loyola Law School in 2012
19 and has been practicing labor and employment law almost exclusively for the past ten years. The majority
20 of her career was spent with The Nourmand Law Firm, APC, a well-respected plaintiff's employment
21 law firm, where her hourly rates were in the range of hourly rates that were approved and found
22 reasonable by California courts.

23 32. *Billing Rate.* Ms. Kurata's billing rate is \$650 per hour. Surveys I have reviewed and
24 experts I have consulted demonstrate to me that this rate is similar to, and likely lower than rates charged
25 by comparable attorneys for similar class action work and complex litigation.

26 **Steven Greenfield**

27 33. *Qualifications and Experience.* Mr. Greenfield has over 7 years of legal experience. Mr.
28 Greenfield graduated from Yeshiva University, New York, in 1996, where he was valedictorian from the
Sy Syms School of Business, and from University of Pennsylvania Law School, in 1999, where he
graduated in the top 25% of his class. Mr. Greenfield was admitted to the New York Bar in 2000. Since
graduating from law school, Mr. Greenfield has focused his legal career on tax and corporate law.

1 Starting in December 2022, Mr. Greenfield has focused on wage and hour and consumer class actions.
2 Mr. Greenfield sat for the California Bar Exam on July 25, 2023.

3 34. *Billing Rate.* Mr. Greenfield's current billing rate is \$425 per hour. Surveys I have
4 reviewed and experts I have consulted demonstrate that this rate is similar to rates charged by comparable
5 attorneys for similar class action work and complex litigation.

6 **HOURS SPENT ON LITIGATION ARE REASONABLE**

7 35. I was responsible for managing Plaintiffs' Counsel's work including the work of other
8 attorneys employed to assist with litigation. In managing the case, I made every effort to litigate this matter
9 efficiently by coordinating the work of HL and BNBD, minimizing duplication, and assigning tasks in a
10 time and cost-efficient manner, based on the timekeepers' experience levels and talents.

11 36. In my professional judgment, there can be no question that the involvement of each of the
12 attorneys in the case was necessary to provide adequate and effective representation to Plaintiff in this
13 complex litigation. The varied types of abilities and levels of experience of the attorneys who worked on
14 this case allowed us to delegate tasks efficiently and provide skilled coverage. The instances where
15 multiple attorneys contributed to the same task (for example, opposing the coordination motion and
16 mediation brief) were, in my professional judgment, necessary to ensure coordination and accuracy, and
17 to capture the particular expertise of each attorney.

18 37. In sum, it is my opinion and professional judgment that the hours spent by HammondLaw
19 attorneys were both reasonable and necessary to the effective representation of our client and the Class.
20 My opinion is informed by my involvement as lead-counsel, and over a decade of experience in litigating
21 many large class actions in which, similar to this case, it was necessary to field and manage a team of
22 lawyers, with different levels of experience and types of expertise, to carry out the work required by the
23 case.

24 **REASONABLE HOURLY RATES**

25 38. Plaintiffs' Counsel are requesting that their time on this case be compensated on a
26 percentage-of-the-fund basis, with a lodestar-multiplier cross check in which the requested fees are
27 viewed in light of the prevailing market rates. Based on my knowledge of billing rates and practices and
28 surveys and court decisions I have reviewed, I believe that our hourly billing rates shown in the table
immediately below are consistent with, if not lower than, the rates charged by comparable attorneys for
similar class action work and complex litigation, including particular firms that regularly prosecute or
defend employment class actions and other complex litigation; and that the rates we charge are reasonable
for attorneys of our experience, reputation, and expertise practicing complex and class action litigation.

2022 Rates		
Attorney/Timekeeper	Year Admitted	Rate
Julian Hammond, Principal	2000	\$925
Polina Brandler, Counsel	2010	\$750
Ari Cherniak, Associate	2011	\$650
Adrian Barnes, Counsel	2007	\$775
Steven Greenfield, Associate	2000	\$425
Melissa Kurata, Associate	2013	\$650

39. HL's hourly 2023 rates have been approved in *Brandmeier v Columbia Southern University*, Case No. 22CV013638 (Alameda County Superior Court) (August 28, 2023); *Harrold v California Family Health LLC*, Case No. 34-2022-00323409 (Sacramento County Superior Court) (August 17, 2023); *Castillo, et al. v. Holy Names University, Inc.*, Case No. 22CV005286 (Alameda County Superior Court, May 2, 2023 ; *Harris v. Southern New Hampshire University*, Case No. RG21109745 (Alameda County Superior Court, May 17, 2023); and *Carr et al v Konica Minolta Business Solutions U.S.A., Inc.*, Case No. 21CV001245 (Alameda County Superior Court) (June 27, 2023) (awarding 2.1 multiplier calculated using my firm's 2023 rates).

40. HL's slightly lower 2022 hourly rates have been approved in by California Superior Courts in *Glor v iHeart Media + Entertainment*, Case No. 22CV005286 (Alameda County Superior Court) (February 14, 2023); *Cassidy v Keyence Corporation of America*, Case No. 21CV382350 (Santa Clara County Superior Court) (February 8, 2023); *Rodriguez v River City Bank*, Case No. 1-13-cv-257676 (Sacramento County Superior Court, October 26, 2022); *Burleigh v. National University*, Case No. MSC21-00939 (Contra Costa County Superior Court, Aug. 26, 2022); *Costa v University of Antelope Valley*, Case No. 21STCV18531 (Los Angeles County Superior Court, August 23, 2022); *Parsons v. La Sierra University*, Case No. CVRI2000104 (Riverside County Superior Court, May 19, 2022); *Chindamo v. Chapman University*, Case No. 30-2020-01147814-CU-OE-CXC (Orange County Superior Court, April 15, 2022); *Sweetland-Gil v. University of the Pacific*, Case No. STK-CV-UOE-2019-0014682 (San Joaquin County Superior Court, March 4, 2022); and *Senese v. University of San Diego*, Case No. 37-2019-00047124-CU-OE-CTL (San Diego County Superior Court, February 8, 2022).

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REQUESTED COSTS ARE REASONABLE

41. HammondLaw has incurred \$18,436.22 in out-of-pocket costs as follows:

Lisa Klerman (Mediation)	\$5,000.00
One Legal (filing and service)	\$2,325.22
LWDA (PAGA fee)	\$75.00
EconOne (data analysis)	\$5,036.00
Witness Location/ Survey	\$5,000.00
Document Management	\$1,000.00
TOTAL	\$18,436.22

42. Mediation costs represent half of the Plaintiff's fee of the private mediator who assisted the parties during the all-day mediation.

43. One Legal costs were necessary for filing and serving documents in this case.

44. PAGA cost was the payment to the LWDA for Plaintiff's initial PAGA Notice.

45. Econ One (data analysis) costs were reasonably necessary to analyze data produced by Defendant prior to mediation.

46. Survey / witness locator costs were reasonably necessary for Plaintiff's investigation and factual development of their claims.

47. Document Management Costs were reasonably necessary for storing, categorizing, tagging, and producing necessary documents for this litigation.

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

Dated: September 15, 2023



Julian Hammond