

THE MARKHAM LAW FIRM

David R. Markham (SBN 71814)

dmarkham@markham-law.com

Lisa R. Brevard (SBN 323391)

lbrevard@markham-law.com

888 Prospect Street, Suite 200

La Jolla, CA 92037

Telephone: (619) 399-3995/ Facsimile: (619) 323-1684

COHELAN KHOURY & SINGER

Isam C. Khoury (SBN 58759)

ikhoury@ckslaw.com

Michael D. Singer (SBN 115301)

msinger@ckslaw.com

Maggie K. Realin (SBN 263639)

mrealin@ckslaw.com

605 C Street, Suite 200

San Diego, CA 92101

Telephone: (619) 595-3001/ Facsimile: (619) 595-3000

UNITED EMPLOYEES LAW GROUP

Walter L. Haines (SBN 071075)

walter@uelglaw.com

5500 Bolsa Avenue, Suite 203

Huntington Beach, CA 92649

Tel.: 888.474.7242; Fax: 562.256.1006

Attorneys for Plaintiff Kevin Hickey

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO**

KEVIN HICKEY, an individual, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

TRANSFORM SEARS HOME SERVICES,
LLC, a Delaware corporation; and DOES 1
through 10, inclusive,

Defendants.

CASE NO. 34-2022-00321759

REPRESENTATIVE ACTION

**DECLARATION OF DAVID R.
MARKHAM IN SUPPORT OF
PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA
REPRESENTATIVE SETTLEMENT**

Date: March 28, 2025

Time: 9:00 a.m.

Dept: 22

Reservation No: A-321759-001

Complaint filed: June 14, 2022

Trial date: None Set

1 I, David R. Markham, declare:

2 1. I am an attorney licensed to practice before all courts of the State of California. I am
3 counsel of record for Plaintiff Kevin Hickey in this action. I make this Declaration in support of
4 Plaintiff's Unopposed Motion for Approval of PAGA Representative Settlement. I make this
5 declaration based on my personal knowledge, and if called to testify, I could and would competently
6 testify to the matters contained in this declaration. I join in the description provided by my co-counsel
7 Michael D. Singer in his concurrently filed declaration in support of approval of this settlement.

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

15 **Qualifications of Class Counsel**

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

23 4. My firm has obtained many large class and representative action settlements which have
24 benefited consumers and employees. Two of those cases alone have resulted in recovery of over a
25 billion dollars for class members. In *Jordan v. California Department of Motor Vehicles*, we obtained a
26 settlement fund of over \$665 million for the benefit of new California residents who registered their
27 out-of-state vehicles and were unlawfully charged the \$300 smog impact fee. *Jordan v. California*
28 *Dep't of Motor Vehicles*, 100 Cal. App. 4th 431, 440, (2002), as modified on denial of reh'g (Aug. 20,

2002). In *Sparks v. AT&T et al.*, a settlement fund of over \$350 million was obtained for consumers nationwide who had been overcharged for residential telephone equipment. Case No. 96-LM-983, 01-L-1668 (Ill. Cir. Ct., Madison County).

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

6. More recent wage and hour settlements that my firm has reached include a \$11,500,000 settlement in *Harrison v. Bank of America*, Case No. 3:19-cv-00316-LB, United States District Court for the Northern District of California, finally approved on November 24, 2021; a \$4,600,000 settlement in *Vasquez v. Bank of America*, Case No. CGC-18-571669, San Francisco Superior Court, finally approved on July 29, 2022; a \$1,375,000 settlement in *Diaz et al. v. United Parcel Service, Inc.*, United States District Court for the Eastern District of California, Case No. 1:22-cv-00246-CDB, finally approved on December 13, 2023; a \$24,000,000 global settlement in *Esteban v. American Airlines*, Case No. 20STCV47361, Los Angeles Superior Court, finally approved on April 26, 2024; a \$2,000,000 settlement in *Stewart v. Del Monte*, Case No. 1:22-CV-04919-RMI, United States District Court for the Northern District of California, finally approved on May 29, 2024; a \$2,900,000 settlement in *Swayzer et al. v. Circle K*, Case No. 34-2018-00234999, Sacramento Superior Court, finally approved on February 18, 2022; a \$775,000 settlement in *Ward v. Sutter*, Case No. 34-2020-00279954-CU-OE-GDS, Sacramento Superior Court, finally approved on January 10, 2025; a \$975,000 settlement in *Shaw v. Kaiser Foundation Health Plan, Inc.*, Case No. CVRI2102203, Riverside Superior Court, finally approved on January 10, 2024; a \$750,000 settlement in *Almanzar v. Home Depot U.S.A., Inc.*, Case No. 2:20-cv-00699-KJN, United States District Court for the Eastern District

1 of California, finally approved on January 3, 2024; a \$750,000 settlement in *Delamora, et al. v. Thorpe*
2 *Design, Inc.*, Case No. C22-00931, Contra Costa Superior Court, finally approved on October 2, 2023;
3 a \$800,000 settlement in *Slaughter v. California C.C.S. P.C., dba Wellpath*, Case No. CIVDS1935187,
4 San Bernardino Superior Court, finally approved on May 6, 2022; a \$750,000 settlement in *Antenucci*
5 *v. Bank of the West*, Case No. CGC-20-583746, San Francisco Superior Court, finally approved on
6 December 7, 2022, a \$1,000,000 settlement in *Kelly v. Simco Electronics*, Case No. 20CV370177,
7 Santa Clara Superior Court, finally approved on January 19, 2022; a \$5,900,000 settlement in
8 *Hurtubise v. Sutter East Bay Hospitals*, Case No. RG17868819, Sacramento Superior Court, finally
9 approved on December 27, 2021; a \$825,000 settlement in *Fritsch et al. v. Swift Transportation Co.*,
10 Case No. 5:17-cv-02226-VAP-KKx, United States District Court for the Central District of California,
11 finally approved on January 4, 2022; a \$1.62 million PAGA-only Settlement in *Moreno, et al. v. Habit*
12 *Employment, LP, et al.*, Case No. 37-2019-00014576-CU-OE-CTL, San Diego Superior Court,
13 approved on September 10, 2021; a \$2,295,000 settlement in *Veramendi v. Airtouch Cellular Inc., et*
14 *al.*, Case No. BC647309, Los Angeles Superior Court, finally approved on June 3, 2021; a \$438,000
15 settlement in *Valdez v. Pro Unlimited, Inc., et al.*, Case No. CGC-19-574146, San Francisco Superior
16 Court, finally approved on May 10, 2021, an average settlement share of \$5,511.11 per employee in
17 *Hopstein v. Hewlett Packard Enterprise Company (d.b.a. HPE), et al.*, Case No. 17CV305577, Santa
18 Clara Superior Court, finally approved on December 2, 2020; an average settlement share of \$1,139.71
19 per employee in *Cuevas v. Three Rivers Trucking, Inc.*, Case No. BC655003, Los Angeles Superior
20 Court, finally approved on July 29, 2020; a \$1.2 million class and PAGA representative action
21 settlement in *Hernandez et al. v. SFM, LLC*, Case No. 37-2016-00015169, San Diego Superior Court,
22 finally approved on July 21, 2020 (aff'd March 16, 2022); \$8.7 million settlement in *Evans v. Wal-Mart*
23 *Stores, Inc.*, Case No. 2:10-cv-1224, United States District Court for the District of Nevada, finally
24 approved on July 8, 2020 (Dkt. No. 135); \$35 million settlement in *Merino v. Wells Fargo*, Case No.
25 2:16-cv-07840-ES-MA, United States District Court for the District of New Jersey, finally approved on
26 January 15, 2020 (Dkt. No. 144); an average settlement share of \$1,317.31 per employee in *Angala v.*
27 *Kaiser Foundation Hospitals*, Case No. HG18899291, Alameda County Superior Court, finally
28 approved on January 13, 2020; \$600,000 settlement in *Hoover v. Sedgwick Claims Management*

1 *Services, Inc.*, Case No. 34-2018-00239159, Sacramento Superior Court, finally approved on December
2 6, 2019; \$950,000 settlement in *Bessellieu v. Metro Shore Services, LLC, et al.*, Case No. BC6737001,
3 Los Angeles Superior Court, finally approved on May 21, 2019; \$1.6 million settlement in *Jenkins v.*
4 *The Mentor Network, Inc., et al.*, Case No. 34-2015-00187936, Sacramento Superior Court, finally
5 approved on September 13, 2018; \$27.5 million settlement in *Wells Fargo Wage and Hour Cases*, Case
6 No. JCCP004821, Alameda County Superior Court, finally approved on March 28, 2018; \$2.5 million
7 settlement in *Geilenfeldt v. EDF Renewable Energy, Inc.*, Case No. 37-2016-00001369, San Diego
8 Superior Court, finally approved on March 9, 2018; \$3 million settlement in *Vangsoulatda v. Blue*
9 *Shield*, Case No. CGC-14-543296, San Francisco County Superior Court, finally approved on January
10 25, 2018; \$650,000 settlement in *McCarthy v. Marriott Hotel Services, Inc.*, Case No. 16-cv-293998,
11 Santa Clara Superior Court, finally approved on October 16, 2017; \$4.9 million settlement for
12 insurance adjusters in *Alvarez v. Farmers*, case number 3:14-cv-00574-WHO, finally approved on
13 January 18, 2017 by Judge Orrick (Dkt. No. 189); \$3.77 million settlement for California warehouse
14 workers in *Saldana v. Amazon*, case number 3:14-cv-00290-DJH (W.D. Ky.), finally approved on
15 October 31, 2016 (Dkt. No. 228).

16 7. My other recent California wage and hour settlements also resulted in substantial
17 recoveries for class members. For instance, I settled *Kogok v. T-Mobile USA, Inc.*, Case No. 37-2012-
18 00076945 (San Diego Super. Ct. Jan. 2015) for \$2,750,000; *Johnson v. Metlife Ins. Co.*, Case No. 13-
19 cv-128-JLS-RNB (C.D. Cal. Mar. 19, 2015) for \$1,970,000; *Erickson v. Old Republic Title Company*,
20 Case No. 13-cv-1210-NLS, (S.D. Cal. Feb. 10, 2016) for \$970,000 plus payroll taxes; *Campagna et al.*
21 *v. Language Line Services, Inc.*, Case No. 30-2012-00578934-CU-OE-CXC (Orange County Superior
22 Court, Mar. 14, 2014) for \$900,000; *Anderson et al. v. Oracle Corp.*, Case No. CIV469916/JCCP No.
23 4597 (Alameda Super. Ct., June 2013) for \$850,000; *McDonagh v. Harrah's Las Vegas, Inc., et al.*,
24 Case No. 13-cv-01744 (United states District Court for the District of Nevada, Dec. 13, 2016), for
25 \$850,000.

26 8. I have also been counsel and argued numerous appellate cases in the California Supreme
27 Court and Courts of Appeal, as well as the Ninth Circuit. Among the published decisions from these
28 cases are: *Daniels v. Philip Morris*, 18 F.Supp.2d 1110 (S.D. Cal. 1998); *Washington Mutual Bank v.*

1 *Super. Ct.*, 24 Cal.4th 906 (2001); *Northwest Mortgage Inc. v. Super. Ct.*, 72 Cal.App. 4th 214 (1999);
2 *Taiheiyo Cement Corp. v. Super. Ct.*, 105 Cal.App. 4th 398 (2003); *Ramos v. Countrywide Home*
3 *Loans*, 82 Cal.App.4th 615 (2000); *In re Tobacco II*, 123 Cal.App.4th 617 (2004); *In re Steroid*
4 *Hormone Prod. Cases*, 181 Cal.App.4th 145 (2010).

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

6 10. Any attorneys' fees awarded in this matter will be allocated 50.34% to Cohelan Khoury
7 & Singer, 33.33% to United Employees Law Group, and 16.33% to the Markham Law Firm. Our client
8 has consented to this fee allocation in writing. My firm has prosecuted this litigation solely on a
9 contingent-fee basis, and has been completely at risk that it would not receive any compensation for
10 prosecuting claims against the Defendant.

11 11. The Markham Law Firm's billing for time and costs in this case includes time billed for
12 investigating the claims and drafting pleadings and the arbitration petition, law and motion practice,
13 attending mediation, reviewing documents and researching legal authorities, and extensive
14 communications and meetings among the parties and counsel. This billing has been prepared from
15 contemporaneous time and bookkeeping records, attached as **Exhibit 1**.

16 12. At the Markham Law Firm, the usual and customarily charged rates of attorneys are:
17 David R. Markham, \$815, Maggie Realin, \$700, Lisa Brevard, \$400, and \$175 for the firm's
18 paralegals. These rates are consistent with the prevailing rates for attorneys of similar experience, skill
19 and reputation, are in line with the market rates in various California legal communities, and were
20 recently approved by several California state and federal courts¹, including on January 10, 2025 by the
21 Sacramento Superior Court in *Ward v. Sutter*, Case No. 34-2020-00279954-CU-OE-GDS, on October 2,
22 2023, by the Contra Costa Superior Court in *Delamora, et al. v. Thorpe Design, Inc.*, Case No. C22-
23 00931; on December 7, 2022, by San Francisco Superior Court in *Antenucci v. Bank of the West*, Case
24 No. CGC-20-583746; on July 29, 2022, by San Francisco Superior Court in *Vasquez v. Bank of*
25 *America*, Case No. CGC-18-571669; on May 26, 2022 by Fresno Superior Court in *Moya v. St. Agnes*
26 *Medical Center*, Case No. 20CECG00975; on May 6, 2022 by San Bernardino Superior Court in

27 _____
28 ¹Ms. Realin's hourly rate has increased from \$550 to \$700 as a partner with over 15 years of combined experience in class action and appellate work.

1 *Slaughter v. California CCS, P.C.*, Case No. CIVDS1935187; on January 19, 2022 by Santa Clara
2 Superior Court in *Kelly v. Simco*, Case No. 20CV370177; on January 4, 2022 by the United States
3 District Court for the Central District of California in *Fritsch et al. v. Swift Transportation Co. of*
4 *Arizona*, Case No. 5:17-cv-02226-VAP-KKx; on December 27, 2021 by Sacramento Superior Court in
5 *Hurtubise v. Sutter*, Case No. RG17868819; on November 24, 2021 by the United States District Court for
6 the Northern District of California in *Harrison v. Bank of America*, Case No. 3:19-cv-00316-LB; and on
7 September 10, 2021 by San Diego Superior Court in *Moreno, et al. v. Habit Employment, LP, et al*,
8 Case No. 37-2019-00014576-CU-OE-CTL.

9 13. I have devoted 16.5 hours to the prosecution of this action. We anticipate that we will
10 incur approximately 10-20 additional billable hours to prepare for and attend the settlement approval
11 hearing, and oversee the settlement administration.

12 14. My former partner, Maggie Realin, devoted 10.8 hours to the prosecution of this action
13 while at my firm.

14 15. My firm's associate, Lisa Brevard, devoted 52.3 hours to the prosecution of this action.
15 Ms. Brevard is a graduate of the University of California, Los Angeles, and University of San Diego
16 School of Law. She received her J.D., summa cum laude, and was admitted to the California Bar in
17 2018. During law school, Ms. Brevard interned at the USD Appellate Clinic, where she presented oral
18 argument before the Ninth Circuit Court of Appeals. She was an active participant on the University of
19 San Diego Appellate Moot Court Board and competed in regional and national competitions.
20 Additionally, she gained legal experience on corporate and litigation matters as a law clerk and summer
21 associate for a national firm. Since joining my firm in May 2019, Ms. Brevard has focused on
22 representing employees in wage and hour class actions.

23 16. My firm's paralegal (and former paralegal during the time that she was employed at my
24 firm), meet the qualifications and continuing education requirements set forth in Business &
25 Professions Code § 6450. My firm's paralegals collectively spent 36.9 hours on this action.

26 17. To prosecute this action, my firm incurred \$4,348.59 in costs. These costs and expenses
27 identified in my firm's costs summary are reflected in the accounting books and records that my law
28 firm maintains in the ordinary course of business, and are prepared from expense records, credit card

1 receipts and statements, and check records. These expenses were necessary for this litigation and
2 include the amounts paid for court filing fees, mediator fees, and service of process charges, all of
3 which are costs normally billed to and paid by the client. These costs were reasonably incurred in the
4 prosecution of this matter and are authorized by the Settlement Agreement.

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

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

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

15 Executed on February 27, 2025, at San Diego, California

16
17 By: 
18 David R. Markham
19 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	16.5	\$815.00	\$13,447.50
Maggie K. Realin	P	10.8	\$700.00	\$7,560.00
Lisa R. Brevard	A	52.3	\$400.00	\$20,920.00
ATTORNEY TOTAL:		79.6		\$41,927.50

PARALEGALS

Leeanna D. Carcione	PL	23.6	\$175.00	\$4,130.00
Noor Haleem	PL	13.3	\$175.00	\$2,327.50
PARALEGAL TOTAL:		36.9		\$6,457.50
GRAND TOTAL:		116.5		\$48,385.00

(P) Partner

(A) Associate

(PL) Paralegal

Expense Charges	\$4,348.59
Subtotal:	\$4,348.59
TOTAL:	\$4,348.59

Hickey v. Transform Sears Home Services; Case No. 34-2022-00321759

Category	Date	Vendor	Description	Amount
Process Service Fees	6/15/2022	Knox Atty Service	Invoice #4372113	\$ 1,632.10
	6/30/2022	Knox Atty Service	Invoice #4373383	\$ 113.35
	7/6/2022	Knox Atty Service	Invoice #4373712	\$ 75.75
	8/15/2022	Knox Atty Service	Invoice #4376958	\$ 81.75
	2/2/2023	Knox Atty Service	Invoice #4391749	\$ 285.75
	4/6/2023	Knox Atty Service	Invoice #4397725	\$ 100.50
	4/19/2023	Knox Atty Service	Invoice #4398899	\$ 83.15
	10/25/2023	Knox Atty Service	Invoice #4416243	\$ 100.50
	Total - Process Service Fees			\$ 2,472.85
Postage - Mailing Fees	8/31/2023	Postage	Fee to mail petition for arbitration	\$ 12.84
	Total - Postage			\$ 12.84
E-filing and Court Fees	2/6/2024	One Legal	Credit Card Sale_05715019□	\$ 39.02
	2/15/2024	One Legal	Credit Card Sale_05745062□	\$ 51.48
	2/6/2024	One Legal	E-Serve Charge (7 recipients)□	\$ 5.40
	9/19/2024	ROA	Download order	\$ 7.00
	Total - E-Filing and Court Fees□			\$ 102.90
Mediation Fees	9/24/2024	Mediation	Mediation fee	\$ 1,760.00
	Total - Mediation Fees			\$ 1,760.00
Grand Total				\$ 4,348.59

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

Date	Task	Time
3/8/2022	Call with MR re case	0.4
4/5/2022	review email exchange with co counsel re PF	0.1
4/7/2022	review PAGA letter	0.1
4/7/2022	review documents from client	0.5
6/9/2022	research re case status and strategy	0.2
6/13/2022	review draft of complaint	0.2
6/14/2022	review final version of complaint	0.1
7/11/2022	review email from counsel re arb agreement	0.1
7/12/2022	call with MR and LB re case strategy	0.3
7/12/2022	review email to defense counsel re arb agreement	0.1
8/5/2022	review proposed email to defense counsel re arb agreement	0.1
8/5/2022	review D's email re arb injunction	0.1
8/16/2022	review proposed email re mediation	0.1
8/31/2022	review email exchange re arbitration and stay	0.2
1/13/2023	review complaint, answer and arb agreement before the meet and confer	0.3
1/31/2023	review D's inserts to CMC statement	0.1
2/1/2023	review email exchange with defense counsel re cmc statement	0.1
3/29/2023	review email exchange among counsel re stip and amended complaint	0.1
8/5/2023	Call with counsel re settlement	0.5
8/30/2023	review petition for arbitration	0.2
9/17/2023	Prep correspondence re settlement	0.5
12/15/2023	Prep correspondence counsel re settlement	0.4
1/6/2024	Call with counsel re settlement	0.5
8/31/2024	Review draft MOU	0.6
9/17/2024	Call w/ LB re mediation	0.1
9/18/2024	Review FEHA complaint; call w/ LB re status	0.3
10/1/2024	Call w/ MR & LB	0.2
10/7/2024	Attn mediation brief	1.6
10/7/2024	review email from LB re mediation brief based on data received/claims & exhibits	0.2
10/16/2024	mediation	5
11/4/2024	Emails with LB re MOU	0.1
1/13/2025	Conf LB re motion re approval	0.3
1/15/2025	Review settlement approval doc's	0.8
2/3/2025	review individual release agreement	0.3
2/4/2025	Attn DRM declaration re settlement approval	0.9
2/20/2025	Review client SA docs; call w/ MR	0.2
2/24/2025	Emails re client dec; email from client	0.1
3/3/2025	Review finalized motion for filing	0.5
Total		16.5

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

Date	Task	Time
3/8/2022	Call with LB re case	0.2
3/8/2022	Call with DRM re case	0.4
4/5/2022	email exchange with co counsel re PF	0.2
4/7/2022	review and edit PAGA letter	0.4
4/7/2022	review documents from client, email to LB	1.1
6/9/2022	research re case status and strategy	0.7
6/13/2022	review and edit complaint	0.9
6/14/2022	review final version of complaint	0.3
6/22/2022	review email from LB re complaint	0.1
7/11/2022	review email from counsel re arb agreement	0.1
7/12/2022	call with DRM and LB re case strategy	0.3
7/12/2022	email to defense counsel re arb agreement	0.1
8/4/2022	call with LB	0.1
8/5/2022	review proposed email to defense counsel re arb agreement, email exchange with LB	0.2
8/5/2022	email exchange with LB re arb agreement	0.2
8/5/2022	review D's email re arb injunction	0.1
8/5/2022	legal research re injunction re arb, email to LB	0.8
8/16/2022	review proposed email re mediation	0.1
8/31/2022	review email exchange re arbitration and stay	0.2
1/13/2023	review complaint, answer and arb agreement before the meet and confer, email exchange with LB	1
1/31/2023	review D's inserts to CMC statement, further edit statement	0.3
2/1/2023	email exchange with defense counsel re cmc statement	0.2
2/1/2023	review final version of the CMC statement and POS	0.2
2/23/2023	call with LB	0.2
3/29/2023	review email exchange among counsel re stip and amended complaint	0.1
8/30/2023	review and edit petition for arbitration	0.7
8/30/2023	review further edits to petition for arbitration	0.3
1/29/2024	research re arbitrator selection	1.3
	Total	10.8

Lisa Brevard, Esq., Associate Attorney (\$400/hr; admitted 2018)

Date	Task	Time
3/8/2022	Review intake; emails & call w/ MR	0.2
3/21/2022	Review emails from co-counsel & MR	0.1
4/7/2022	Emails w/ MR & review wage statement	0.2
4/7/2022	Call w/ MR re claims	0.1
4/7/2022	Review email from MR re sign on bonus & PAGA letter	0.1
6/12/2022	Review complaint re related case; our case	0.1
6/13/2022	Review email to client re complaint	0.1
6/13/2022	Review MR edits to complaint	0.1
6/22/2022	Emails re service of complaint	0.1
6/24/2022	Review order re complex determination	0.1
7/12/2022	Review email from defense; emails w/ MR & DRM	0.2
7/12/2022	Call w/ MR & DRM re arb agreement; next steps	0.3
7/14/2022	Review email from defense counsel	0.1
7/22/2022	Review language of arb agreement; call w/ DRM	0.3
7/22/2022	Prepare draft email to defense; email DRM	0.2
7/22/2022	Email defense counsel	0.1
7/22/2022	Further emails w/ DRM & defense counsel	0.2
7/22/2022	Call w/ DRM to discuss email from defense	0.1
7/25/2022	Review opinion re indiv & non-indiv PAGA claims; call w/ DRM; review decisions	0.5
8/1/2022	Edit email to defense; emails w/ DRM	0.4
8/1/2022	Email defense	0.2
8/4/2022	Email defense; call w/ MR	0.2
8/4/2022	Template re decl iso dismissal	0.1
8/4/2022	Review PAGA only complaint; emails	1.3
8/5/2022	Review emails re arb agreement language; emails w/ MR	0.3
8/5/2022	Review <i>Bonta</i> case re mandatory arb; articles re mandatory arb & email MR	0.2
8/12/2022	Review defendant's answer; email MR	0.1
8/12/2022	Review POS; notice for filing	0.1
8/12/2022	Emails w/ DRM	0.1
8/30/2022	Emails w/ defense counsel re stay; emails w / MR & DRM	0.4
9/6/2022	Email DRM; call w/ DRM	0.1
9/16/2022	Emails w/ DRM re status	0.1
9/26/2022	Review emails from DRM re status	0.1
9/27/2022	Email defense counsel re scheduling call	0.1
2/22/2023	Email defense re call	0.1
2/22/2023	Email defense re call	0.1
2/23/2023	Review Bonta decision & emails prior to call w/ defense; call w/ MR	1.3
2/23/2023	Call w/ defense counsel	0.1
3/7/2023	Email defense counsel re M&C	0.1
3/20/2023	Review & provide edits to draft stipulation; incorporate add'l edits	0.5
3/21/2023	Review & provide edits to PAGA complaint; email MR & email defense	0.3
3/28/2023	Email defense counsel re stip	0.1
4/3/2023	Emails re stip	0.1
5/10/2023	Review defendant's amended answer	0.1
7/17/2023	Review order/dates; call w/ DRM re Adolph decision & emails	0.8
7/18/2023	Review articles re impact of Adolph; next steps	0.2
7/18/2023	Email defense counsel re scheduling call	0.1
7/20/2023	Email DRM & defense counsel	0.1
7/26/2023	Email DRM; review stip & emails	0.2
7/27/2023	Review arbitration agreement; research re tolling; email MR/DRM & email client	0.5
7/27/2023	Follow-up emails w/ co-counsel & client; save	0.3
7/27/2023	Review article interpreting Adolph; emails w/ DRM	0.3
7/28/2023	Review & edit stipulation; email MR & DRM	0.2
7/30/2023	Email defense counsel re stipulation	0.2
7/31/2023	Emails w/ defense counsel re stip	0.2
8/2/2023	Emails w/ MR & DRM re email to defense	0.2
8/3/2023	Email DRM re email to defense	0.1
8/30/2023	Review emails from MR re edits to arb complaint; review arb agreement	0.3
8/31/2023	Review submitted petition; email defense	0.2
9/25/2023	Emails w/ arbitrator & MR	0.2
9/29/2023	Review emails from defense/arbitrator	0.1
9/29/2023	Review notification letter from arbitrator	0.2
10/3/2023	Review email from arbitrator	0.1
10/18/2023	Review docket re CMC	0.1
10/18/2023	Review & edit stipulation/PO; check status of arbitration	0.5
10/19/2023	Email from defense; review finalized stip for filing	0.2
11/6/2023	Review order continuing CMC & calendared dates; email defense	0.2

1/29/2024	Review email re arbitrators	0.1
2/6/2024	Review draft status report; email defense; review final for filing	0.3
2/12/2024	Email with MR re arbitrator rankings	0.1
2/15/2024	Email re order; email defense	0.1
2/29/2024	Emails re arbitration demand; review JAMs rules	0.4
2/29/2024	Review & edit amended arbitration petition	0.5
2/29/2024	Emails re filing for amended arb petition	0.4
3/1/2024	Review final petition & POS for filing	0.3
3/4/2024	Review arb rules; email co-counsel	0.1
3/14/2024	Review def's answer	0.2
3/21/2024	Review arb initiation docs; email DRM	0.2
3/28/2024	Email from defense; messages w/ MR & DRM re mediation	0.1
3/28/2024	Call w/ DRM re call to defense	0.2
4/5/2024	Emails w/ DRM re mediation	0.1
4/10/2024	Review JPA; email DRM	0.1
4/11/2024	Review email to client	0.1
4/12/2024	Call w/ MR re mediation/arbitrator email; emails w/ DRM	0.2
4/18/2024	Email DRM & MR re mediator list	0.1
4/18/2024	Complete arbitrator availability; email MR & DRM	0.2
4/25/2024	Email DRM re mediators	0.1
4/29/2024	Review correspondence from arbitrator; emails re mediator	0.4
4/30/2024	Review mediation dates & emails w/ MR	0.3
5/6/2024	Review status re mediator selection	0.1
5/27/2024	Review & save request to continue CMC	0.1
5/30/2024	Review order continuing CMC	0.1
6/3/2024	Review new CMC date; D/L to file CMC statement	0.1
6/19/2024	Emails w/ DRM & MR re status report language	0.4
8/30/2024	Email defense re mediation data	0.1
9/5/2024	Email defense re mediation data	0.1
9/17/2024	Call w/ DRM re mediation; email client re scheduling call	0.1
9/17/2024	Emails w/ client re scheduling call	0.1
9/17/2024	Email Aaron Brock re status of case; additional emails w/ client	0.2
9/17/2024	Emails w/ Brock re complaint; status of individual case; review compl. & docket	0.3
9/18/2024	Review FEHA complaint; call w/ DRM re status	0.3
9/18/2024	Review FAC & draft mediation brief	0.4
9/23/2024	Review notice of related cases; dockets & complaints in related cases; email counsel	0.5
9/24/2024	Emails re rescheduling call; review stips & orders in related cases & email MR	0.3
9/26/2024	Call w/ counsel in client's individual case re status & next steps	0.3
9/27/2024	Email co-counsel re mediation	0.1
9/30/2024	Email defense re data	0.1
10/1/2024	Review pre-mediation data prior to call w/ DRM & MR; review info re potential expert	0.3
10/1/2024	Call w/ MR & DRM; email expert	0.3
10/2/2024	Email pl individual counsel	0.1
10/3/2024	Update mediation brief based on data received/complaint	0.4
10/7/2024	Update mediation brief based on data received/claims & exhibits; email DRM & MR	1.8
10/7/2024	Call w/ client & MR	0.5
10/8/2024	Review expert analysis chart; email MR	0.2
10/8/2024	Edit mediation brief with info from expert analysis; email MR & DRM	1.3
10/9/2024	Update mediation brief; emails w/ MR & DRM	1.5
10/16/2024	Emails & call with MR prior to mediation	0.8
10/16/2024	Review for mediation	0.5
10/16/2024	Attend mediation	5
10/17/2024	Emails re release language	0.2
10/21/2024	Messages w/ MR & client re discussing mediator's proposal	0.2
10/21/2024	Review mediator's proposal prior to call w/ client & MR	0.2
10/21/2024	Call w/ client & MR	0.2
10/21/2024	Call w/ MR re proposal	0.1
10/24/2024	Calls & emails re language for email to mediator	0.4
10/30/2024	Review edits to MOU; email MR & DRM re edits; email individual counsel	0.8
10/31/2024	Review emails re MOU	0.1
11/4/2024	Email DRM re MOU	0.1
11/6/2024	Review finalized MOU; email to client for signature	0.3
11/7/2024	Emails re executed MOU; call with DRM	0.1
11/11/2024	Review MOU; emails w/ MR	0.2
11/27/2024	Review stip/order continuing CMC; email re calendaring	0.1
1/13/2025	Email MR re reserving hearing and document review	0.1
1/13/2025	Review emails w/ settlement documents; email re preparing pl dec	0.3
1/13/2025	Messages/emails re settlement documents & hearing date	0.4
1/13/2025	Review PAGA settlement guidelines & review/edit settlement documents; email MR re Singer dec.	0.7
1/14/2025	Review & edit PAGA SA; email MR & DRM	0.8

	1/14/2025	Review & edit individual SA, motion, notice & admin dec; email MR & DRM	1.4
	1/14/2025	Emails w/ MR & DRM re PAGA approval papers; call w/ MR	0.5
	1/15/2025	Prepare email w/ templates for plaintiff's decl. & counsel declarations following guidelines	0.3
	1/27/2025	Review email from defense counsel; edits to SAs	0.2
	1/27/2025	Review defense edits to SAs; emails w/ MR	0.2
	1/27/2025	Email individual plaintiff counsel re edits to individual SA	0.2
	1/27/2025	Review emails re hearing date & tent.; calendar same	0.1
	1/29/2025	Email pl counsel re SA	0.1
	2/3/2025	Review docket; emails re CMC	0.1
	2/3/2025	Emails w/ MR & pl counsel re individual SA; emails re CMC	0.1
	2/4/2025	Review edits to individual SA; emails w/ MR re edits	0.3
	2/6/2025	Review order continuing CMC; calendared dates	0.1
	2/11/2025	Review defense edits to individual SA; emails w/ MR	0.2
	2/20/2025	Review client SA docs; call w/ MR	0.2
	2/20/2025	Review & edit WH dec	0.3
	2/24/2025	Emails re client dec; email from client	0.1
	2/26/2025	Review & edit final WH dec; emails w/ co-counsel	0.4
	2/26/2025	Re-review SSC guidelines w/ declaration req's; review PAGA approval motion & emails w/ MR	1.4
	2/27/2025	Review & edit DRM dec; review & edit client dec; email co-counsel	2
	3/3/2025	Review finalized motion for filing	0.5
Est.		Prepare for & attend PAGA approval hearing	2
		Total	52.3

Leeanna Carcione, Paralegal (\$175/hr)

Date	Task	Time
4/4/2022	call with MKR re drafting complaint and PAGA letter	0.2
4/4/2022	email to plaintiff requesting call	0.1
4/5/2022	call to clients home and cellphone; leave vm	0.2
4/5/2022	draft PAGA letter; research re job position; research re company;	3.2
4/6/2022	review emails re call to client; review vm from client; text re call today at 2pm	0.2
4/6/2022	Call with client re claims	1.3
4/6/2022	review docs from client; save to file	0.2
4/6/2022	draft memo re notes from call to Hickey	0.8
4/7/2022	call with MKR to discuss	0.2
4/7/2022	review PAGA letter for any further edits after call	0.2
4/7/2022	combine client docs to one file; OCR	0.3
4/8/2022	Review edits to PAGA letter; finalize; email to client for review	0.4
4/8/2022	submit PAGA letter and calculate and calendar deadline to file complaint; email to MKR re same	0.4
6/10/2022	draft hybrid complaint	2.3
6/13/2022	finish draft complaint	1.2
6/13/2022	review draft of complaint and email to MKR	0.2
6/13/2022	review edits to complaint; further edit	0.5
6/13/2022	finalize complaint; email to plaintiff for review; call to plaintiff re same	0.3
6/13/2022	draft case initiating docs; finalize complaint; email to MKR	0.5
6/14/2022	review edits from Plaintiff re complaint; make corrections and email to plaintiff re same	0.2
6/14/2022	finalize complaint and email to MKR	0.1
6/14/2022	upload complaint for filing	0.3
6/14/2022	email to Knox re status of filing complaint; calendar D/L serve	0.2
6/22/2022	check docket for any filings; pull docs needed to serve with complaint; upload docs for service to Knox	0.5
7/1/2022	review signed POS; save to file; calendar d/l to answer	0.2
7/5/2022	submit POS for filing	0.1
9/8/2022	save personnel file requests to file	0.1
7/12/2022	review email exchange re arbitration agreement	0.1
7/22/2022	save arbitration agreement to file	0.1
7/22/2022	calendar EOT for def to respond to complaint	0.1
8/1/2022	email to DRM re case	0.1
8/3/2022	edit complaint to remove class claims	0.6
8/4/2022	continue editing PAGA complaint; email for review	1.6
8/5/2022	review LRB edits to PAGA complaint	0.1
8/5/2022	draft LRB decl iso dismissal of class claims; review arbitration agreement; email to MKR and LRB re arb agreement	0.9
8/10/2022	check docket re answer filed; download order and calendar dates	0.3
8/10/2022	draft notice of order	0.4
8/10/2022	edit notice of order	0.3
8/12/2022	check docket for answer on file; download and email to LRB	0.2
8/12/2022	finalize notice of cmc; email to LRB for review	0.3
8/12/2022	file with Knox and serve notice of CMC	0.3
1/10/2024	check status of arbitration; email to LRB re same	0.2
1/29/2024	review and respond to email from MKR re JAMS access; download docs and email to MKR; calendar date	0.2
2/6/2024	finalize stip and PO; edit POS	0.2
2/6/2024	file and serve stip and PO to continue CMC	0.2

2/8/2024	email; finalize notice of association w/ signature	0.1
2/15/2024	email arbitrator list to case manager; email question to MKR	0.2
2/15/2024	email arbitrator list to case manager	0.1
2/15/2024	check docket re stip; download and calendar	0.3
3/1/2024	finalize amended petition; finalize POS; email to MKR and LRB	0.2
3/1/2024	submit amended petition for arbitration	0.3
3/14/2024	review/save defendant's answer to arbitration petition	0.1
3/21/2024	review/save arbitration docs	0.2
3/25/2024	review/save def's answer to amended demand for arbitration	0.1
4/11/2024	email to LRB re rep agreement	0.1
4/16/2024	email JPA to WH for signature; save to file	0.1
4/16/2024	received JPA with WH and email to CKS	0.1
4/29/2024	save statement to file; calendar	0.2
4/29/2024	email mediators re availability	0.2
4/29/2024	review email from mediator re availability; email to team	0.1
4/30/2024	call Reeves' office re mediation dates; vm	0.1
4/30/2024	email all available mediation dates in one email	0.1
4/30/2024	call from Reeves' office; email re dates	0.1
4/30/2024	call to mediator Hughs office re availability; email to MKR	0.2
4/30/2024	further call to Hughs re availability; email MKR	0.1

Total

23.6

Noor Haleem, Paralegal (\$175/hr)

Date	Task	Time
5/14/2024	Review emails re continuing CMC date	0.1
5/15/2024	Review emails from co-counsel Maggie re mediation	0.1
5/17/2024	Review emails re mediation	0.1
5/28/2024	Review email from Lisa re upcoming hearing; check register of actions, emails with Lisa on same	0.2
5/29/2024	Check register of actions re status of order to continue upcoming CMC	0.1
5/30/2024	Correspondence with Lisa re upcoming hearing and attempted call to clerk re: same	0.2
6/3/2024	Receive and review order re continued case management date and calendar dates on same	0.2
9/19/2024	Review the register of actions and retrieve documents	0.3
9/20/2024	Review emails on upcoming meeting, calendar meeting; email to LB on same	0.2
9/23/2024	Review related cases' register of actions and download; email to LB on same	1
9/24/2024	Download further documents from the related case action, and email to LB on same	0.4
9/30/2024	Receive mediation docs and save on file, email to LB on same	0.4
10/1/2024	Create a drop-box re mediation folder and email to James	0.3
10/2/2024	Review emails re downloading Dec and Opp and email to LB on same	0.4
10/8/2024	Add exhibit A to mediation prep document, email to LB on same	0.1
10/9/2024	Add exhibits tabs, save on file, email to LB on same	0.2
10/11/2024	Email mediator office re upcoming mediation	0.2
10/15/2024	Email mediator office re upcoming mediation and email with co-counsel on same	0.2
10/16/2024	Review/save attestation on file, email to LB on same	0.1
11/6/2024	Send Mou agreement to client for signature	0.1
11/8/2024	Receive and save MOU and email to LB on same	0.2
11/13/2024	Review admin bid received; save on file	0.1
11/19/2024	Review/save ave new admin bid on file, email to LB on same	0.1
1/23/2025	Receive, review, and save joint notice of settlement on folder	0.1
1/27/2025	Review PAGA settlement agreement and email from OPC on same	0.2
1/29/2025	Recieve and review email from court clerk, calendar hearing dates for prelim approval and email to LB on same	0.2
1/29/2025	Recieve, review, and save notice of remote app on file, email to LB on same	0.1
2/3/2025	Check register of actions re upcoming cmc, emails with LB on same	0.2
2/5/2025	Receive, download, review signed stipulation to continue CMC; and calendar upcoming deadline for the Case management conference; email with LB on same	0.2
2/25/2025	Draft DRM declaration, Draft WH declaration, draft Kevin Hickey Dec.; call with client, prepare exhibit one; correspondence with LB on same	7
Total		13.3