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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO**

HARRISON BOMTEMPO, individually, and
on behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

K1 SPEED, INC., a Delaware corporation;
and DOES 1 through 100, inclusive,

Defendant.

Case No. 22-CIV-03134

Honorable Nicole S. Healy
Department 28

CLASS ACTION

**DECLARATION OF YASMIN HOSSEINI
IN SUPPORT OF PLAINTIFF'S
RENEWED MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT, CLASS
COUNSEL FEES AND EXPENSES, AND
CLASS REPRESENTATIVE SERVICE
AWARD**

Date:
Time:
Department: 28

Complaint Filed: August 2, 2022
FAC Filed: June 28, 2024
Trial Date: None Set

DECLARATION OF YASMIN HOSSEINI

I, Yasmin Hosseini, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Harrison Bomtempo (“Plaintiff” or “Class Representative”), and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On October 18, 2024, in Department 28 of the above-entitled Court, the Honorable Nicole Healy preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement Agreement and Release (“Agreement,” “Settlement,” or “Settlement Agreement”) entered into between Plaintiff and Defendant K1 Speed, Inc. (“Defendant”) (together with Plaintiff, the “Parties”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”). The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed ILYM Group, Inc. (“ILYM” or “Settlement Administrator”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval of Class Action and PAGA Settlement, Class Counsel Fees and Expenses, and Class Representative Service Award (“Motion for Final Approval”), no Class Members have opted-out or objected to the Class Settlement or the contemplated request for Class Counsel Fees and Expenses, Class Representative Service Award, Settlement Administration Costs, or allocation for penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

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WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in litigating the above-captioned action since prior to its commencement on August 2, 2022.

5. Before initiating this matter, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and Plaintiff and research into the various legal issues involved in this matter, namely, the current state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, on-duty rest periods, representative PAGA claims, wage-and-hour law and enforcement, Plaintiff's claims and allegations, and potential defenses. After conducting an initial investigation, our firm determined that Plaintiff's claims were well-suited for class-wide and representative adjudication, owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former non-exempt employees in California of Defendant during the Class Period, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, business expenses, and reporting time wages.

6. Class Counsel conducted significant investigation and formal and informal discovery regarding the facts of the case, to assess the veracity, strength, and scope of the claims, and were preparing the case for class certification discovery, class certification, and trial prior to reaching the Agreement. The Parties exchanged a large volume of documents, data, and information in the course of the litigation and in connection with the mediation and settlement negotiations. Class Counsel had the opportunity to interview and obtain information from Plaintiff and percipient witnesses, and reviewed and analyzed a large volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. The large volume of documents, data, and information that Class Counsel reviewed and analyzed included, but was not limited to: Plaintiff's employment records, Plaintiff's time and pay data, time and pay data for a sampling of approximately 75% of other Class Members, company policy acknowledgments, forms, procedures and policies (including, but not limited to, Employee Handbook, Meal Break Waiver, Meal Expense Policy, Meal and Rest Break Policy, Expense Reimbursement Request Form, Track

Associate Training Manual, Cashier Commission Agreement, Bonus Program Definitions, K1 Race Gear – Sales Commission Agreement, Corporate Customer Service/Sales Representative Commission Agreement, Sales Manager Commission Agreement, and Corrective Action Form, among other information and documents. Class Counsel propounded multiple sets of written discovery requests on Defendant (including, but not limited to Special Interrogatories (Sets One and Two), Form Interrogatories—General (Set One) and Request for Document Production (Set One)), as well as noticed two separate Person Most Knowledgeable Depositions, and reviewed Defendant’s responses thereto. Class Counsel also developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations and met and conferred with Defendant’s counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, discovery and the production of information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations, and settlement. Other work performed by Class Counsel included, and was not limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-related papers, the mediation brief, and settlement documents; preparing for and attending court proceedings, mediation, and settlement negotiations, among other tasks.

7. As outlined herein, the Parties have conducted significant investigation and formal and informal discovery during the course of litigating the case, mediation, and extensive settlement negotiations. Class Counsel analyzed a large volume of information, documents, and data obtained from Plaintiff, Defendant, and other sources. The information, documents, and data provided a critical understanding of the nature of the work performed by the Class Members and PAGA Employees, as well as Defendant’s operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, penalties, and other valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation process. Class Counsel also performed significant research into the applicable law, which is evolving as it relates to class certification, off-the-clock theory, regular rate of pay, meal and rest periods, representative PAGA claims and penalties, wage-and-hour law and enforcement, Plaintiff’s claims and allegations, and Defendant’s defenses thereto, as well as facts discovered.

1 8. After conducting significant investigation of the facts and law during the
2 prosecution of the case, counsel for the Parties engaged in extensive settlement negotiations to try
3 to resolve the case. These efforts included participating in a formal, full-day mediation conducted
4 on August 7, 2023 by Jeffery Krivis, Esq., a well-regarded mediator experienced in mediating
5 complex labor and employment matters. During all settlement discussions, the Parties conducted
6 their negotiations at arm's length in an adversarial position. In the course of mediation and
7 settlement discussions, the Parties exchanged information, documents, and data, and discussed
8 various aspects of the case, including and not limited to, the risks and delays of further litigation,
9 the risks and expenses to the Parties of proceeding with class certification and trial, the law relating
10 to class certification, off-the-clock theory, regular rate of pay, meal and rest periods, representative
11 PAGA claims, and wage-and-hour law and enforcement, as well as the evidence produced and
12 analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was
13 acceptable to the Parties was not easy. Defendant contended that individualized questions of fact
14 predominate over any common issues, and these issues would pose challenges to class certification
15 and representative adjudication. Defendant and its counsel felt strongly about Defendant's ability
16 to avoid class certification and prevail on the merits, while Plaintiff's and Class Counsel believed
17 that they would be able to obtain class certification and prevail at trial. With the aid of the
18 mediator's evaluation, the Parties ultimately agreed that the cases were well-suited for settlement
19 given the legal issues relating to Plaintiff's principal claims, as well as the costs and risks to the
20 Parties that would attend further litigation. These risks of further litigation include, and are not
21 limited to, a determination that the claims are unsuitable for class treatment and/or representative
22 adjudication, class de-certification after certification of a class, allowing a jury to decide the claims
23 asserted in the case, and the real possibility of no monetary recovery after years of litigation.

24 9. By way of the accompanying Motion for Final Approval, Class Counsel seeks
25 attorneys' fees in the amount of \$523,250.00, which is 35% of the Maximum Settlement Amount
26 of \$1,495,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff
27 and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%)
28 of the Maximum Settlement Amount.

10. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel has shown; (4) the results that Class Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel has achieved in the cases; and (6) the other cases that Class Counsel has turned down in order to devote their time and efforts to this matter.

11. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Class Counsel has incurred many hours of work in connection with prosecuting the cases such that the award of attorneys' fees is also justified under a lodestar analysis with a modest multiplier of 2.01. Attorneys at Lawyers for Justice, PC have spent a total of **326.30 hours** performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT A"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

12. The attorneys identified below have worked on this case, and they have performed their work in this matter exclusively on a contingency basis.

Attorneys	Titles	Bar Nos.	Years Admitted & Practicing in CA	Rate	Total Hours	Lodestar
Edwin Aiwazian	Managing Attorney & Shareholder	232943	2004 (20 years)	\$1,495	30.40	\$45,448.00
Arby Aiwazian	Shareholder	269827	2010 (14 years)	\$1,295	10.30	\$13,338.50
Joanna Ghosh	Managing Attorney	272479 (CA); 518149 (NY)	2010 (CA); 2013 (NY) (14 years)	\$1,295	2.40	\$3,108.00
Tara Zabehi	Senior Attorney	314706	2017 (7 years)	\$850	15.70	\$13,345.00

Hagit Goltzer	Senior Attorney	324376	2018 (6 years)	\$850	36.20	\$30,770.00
Elizabeth Parker-Fawley	Senior Attorney	301592	2014 (10 years)	\$850	5.80	\$4,930.00
Brian St. John	Senior Attorney	304112	2015 (9 years)	\$850	0.4	\$340.00
Yasmin Hosseini	Senior Attorney	326399	2019 (5 years)	\$850	9.50	\$8,075.00
Ryan Slinger	Attorney	351297	2023 (1 year)	\$575	77.70	\$44,677.00
Samantha Costa	Attorney	346526	2022 (2 years)	\$725	67.90	\$48,227.50
Jacquelyn Silva	Attorney	342302	2021 (3 years)	\$725	50.70	\$36,757.50
Tiffany Hyun	Attorney (formerly)	311743	2016 (8 years)	\$725	1.00	\$725.00
Corrine L. Peters	Attorney (formerly)	336164	2021 (3 years)	\$575	12.90	\$7,417.50
Jeremy Stern	Attorney (formerly)	351412	2023 (1 year)	\$575	5.40	\$3,105.00
Total:					326.30	\$261,264.50

13. Each of the attorneys identified above performed their work in this matter exclusively on a contingency basis. Plaintiff has not been billed for, and has not paid for, any of the work performed in the instant action to date by attorneys at Lawyers *for* Justice, PC (i.e., Plaintiff has not been billed for or paid the hourly rates of the various attorneys who performed work in the instant action). Lawyers *for* Justice, PC will receive compensation for the work performed by attorneys at the firm thus far, if attorneys' fees are awarded by the Court as a part of the Settlement.

14. The billing rates for each of the attorneys listed above, who worked on this matter, are reasonable, usual, and commensurate with the individual backgrounds, training, and experience of the attorneys, in litigating complex wage-and-hour actions, and in particular, employment class actions and representative actions. These rates are the reasonable and usual hourly rates for the referenced attorneys' services in wage and hour class action cases handled by Lawyers *for* Justice, PC, and are commensurate with rates charged in the community by other plaintiffs-side and defense-side attorneys in this practice area. Lawyers *for* Justice, PC almost exclusively handles the prosecution of plaintiffs' side cases. To the best of undersign counsel's knowledge, Lawyers *for* Justice, PC has not billed nor required any of its clients, who are usually workers who do not

1 have the financial means to pay a retainer or otherwise fund the prosecution or litigation of their
2 wage-and-hour cases against their current or former employers, to pay the firm for the legal work
3 performed by attorneys at the firm (and thus, has not billed any clients using any hourly rates).

4 **EXPERIENCE AND ADEQUACY OF**
5 **LAWYERS *for* JUSTICE, PC**

6 15. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
7 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
8 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is
9 attorney of record in dozens of employment-related putative class actions in both state and federal
10 courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on
11 litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”)
12 representative actions. The firm has successfully litigated cases involving nearly every aspect of
13 California wage and hour law, including payment of overtime and minimum wages, provision of
14 meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of
15 compliant wage statements, reimbursement of business expenses, executive, administrative, and
16 other overtime exemptions to the State of California and federal overtime compensation
17 requirements, PAGA claims, and sister statutes under federal law. Lawyers *for* Justice, PC,
18 sometimes in association with other law firms, has recovered millions of dollars on behalf of
19 thousands of individuals in California.

20 16. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers *for* Justice,
21 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
22 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
23 extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute
24 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
25 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October
26 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During
27 the summer of 2000, he studied Legal Writing at Harvard University. From approximately
28 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable

Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over 100 motions, taken or defended over 150 depositions, prepared dozens of expert witnesses for deposition or trial, and attended over 175 mediations. Together with other attorneys at the firm, and in many cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade and litigated over 1,000 class action or representative action cases.

17. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles, and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before all courts of the State of California and all United States District Courts in the State of California. He has worked on many wage-and-hour class action and representative action cases, taking the lead in taking and defending depositions, arguing motions, and attending mediations. He has played an integral role in preparing matters for class certification, including and not limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.

BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his supervision, dozens of class action or representative cases have resulted in settlements that have been granted court approval. He has handled over one hundred and fifty (150) mediations and worked on over two hundred and fifty (250) class action or representative action cases which have resulted in settlement.

18. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013), and she is admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding the Private Attorneys General Act and employer efforts to compel arbitration of PAGA claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, (2019) 8 Cal.5th175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She also has extensive experience with class action and/or representative action settlements, and has handled this process in over 500 cases. Under Edwin Aiwasian, Arby Aiwasian, and her supervision, Lawyers *for* Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. She is a member of the California Employment

1 Lawyers Association, and, on several occasions, has been a speaker regarding topics in wage and
2 hour law at the organization's continuing legal education events.

3 19. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree
4 from University of California, Santa Barbara in 2013 and earned my Juris Doctor degree from
5 Pepperdine University School of Law in 2017. I was admitted to practice law in California in 2019.
6 I am admitted to practice before all courts of the State of California and all federal district courts
7 in the State of California. I have worked on many wage and hour class action and PAGA
8 representative matters, and my work has included, *inter alia*, researching and drafting pleadings,
9 administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement
10 agreements, engaging in motion practice, claims evaluation and analysis, and making court
11 appearances. Prior to working at Lawyers *for* Justice, PC, I represented filmmakers and talent,
12 negotiating and structuring various types of agreements on their behalf. I am a member of the
13 California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian
14 American Bar Association.

15 **LITIGATION COSTS AND EXPENSES INCURRED BY**

16 **LAWYERS *FOR* JUSTICE, PC**

17 20. To date, Class Counsel has borne all of the risks and costs of litigation and will not
18 receive any compensation until recovery is obtained in this matter. Lawyers *for* Justice, PC seeks
19 reimbursement of **\$14,603.14** in litigation costs and expenses incurred in this matter, as reflected
20 in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the
21 prosecution of this matter and to obtain the Settlement Agreement.

22 **CLASS REPRESENTATIVE SERVICE AWARD TO PLAINTIFF**

23 21. In recognition of his efforts and work serving as the Class Representative, the
24 Settlement Agreement provides for a Class Representative Service Award in the amount of
25 \$5,000.00 to Plaintiff Bomtempo. The requested Class Representative Service Award is fair and
26 appropriate. Plaintiff spent a substantial amount of time and effort to produce relevant documents
27 and information and provided facts and evidence to support the prosecution of the claims. Plaintiff
28 was available whenever Class Counsel needed him and actively tried to obtain and provide

1 information that would facilitate the pursuit of the case. Plaintiff spent numerous hours speaking
2 with Class Counsel about his claims, describing his work experiences with Defendant, and
3 gathering and reviewing documents. Accordingly, it is appropriate for Plaintiff to receive
4 \$5,000.00 as a Class Representative Service Award for his services in the cases, in addition to his
5 individual settlement payments.

6 **EXPLANATION OF BILLING**

7 22. On February 19, 2025, the Court issued a Tentative Ruling that denied Plaintiff's
8 Motion for Final Approval without prejudice ("February 2025 Order"). The February 2025 Order
9 sought clarification as to why Plaintiff's declaration avers that he spent approximately 19 hours
10 communicating with his counsel and reviewing documents, while the Attorney Task and Time
11 Chart lists 35.50 hours for Class Counsel to meet and communicate with Plaintiff.

12 23. Due to an inadvertent typographical error, the Attorney Task and Time Chart stated
13 35.50 hours were spent by Class Counsel to meet and communicate with Plaintiff, when it should
14 have stated 25.50 hours.

15 24. Plaintiff's declaration that was filed in support of the Motion for Final Approval of
16 Class Action and PAGA Settlement was executed on August 19, 2024, although the Motion and
17 Plaintiff's declaration were filed on January 24, 2025. In the interim time period, Class Counsel
18 spent several hours communicating with Plaintiff on multiple occasions regarding the status of the
19 case and developments in the case. Additionally, Class Counsel expended time to prepare for the
20 calls with Plaintiff and to document the calls. As such, the 19 hours of time referenced in Plaintiff's
21 declaration does not capture the total time spent by Class Counsel to prepare for client
22 communications, communicating with the client, and documenting the communications.

23 25. I submit that the Agreement is fair, reasonable, and adequate, and is in the best
24 interests of Plaintiff, Class Members, PAGA Employees, and the State of California.

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

27 Executed this 24th day of March 2025, at Glendale, California.

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Yasmin Hosseini

EXHIBIT A

HARRISON BOMTEMPO V. K1 SPEED INC.
San Mateo Superior Court Case No. 22-CIV-03134 (“Class Action”)

HARRISON BOMTEMPO V. K1 SPEED INC.
San Mateo Superior Court Case No. 22-CIV-03135 (“PAGA Action”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet and Communicate with Plaintiff Harrison Bomtempo (“Plaintiff”) during the Case • Edwin Aiwazian – 1.50 hours • Jacquelyn Silva – 7.50 hours • Samantha Costa – 8.50 hours • Jeremy Stern – 0.50 hour • Ryan Slinger – 7.50 hours	25.50
Investigate, Communicate with, and/or Interview Putative Class Members, PAGA Employees, and Percipient Witnesses • Edwin Aiwazian – 5.70 hours • Arby Aiwazian – 3.80 hours	9.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Claims, Conduct Legal Research and Analysis of All Claims Involved, Draft Plaintiff’s Class Action Complaint for Damages (filed on August 2, 2022) (Class Action)	7.50

• Corrine L. Peters – 7.50 hours	
Investigate the Merits of Plaintiff’s Private Attorneys General Act (“PAGA”) Claims, Conduct Legal Research and Analysis of All Allegations Involved, Draft Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on August 2, 2022) (PAGA Action) • Corrine L. Peters – 4.50 hours	4.50
Review and Analyze Notice of Assignment For All Purposes, Designation as Complex Case, Setting of Case Management and Trial Setting Conference, and Complex Fees Due (filed on August 3, 2022) (Class Action) • Corrine L. Peters – 0.10 hour	0.10
Review and Analyze Notice of Assignment For All Purposes (Civil) and Notice of Case Management Conference (filed on August 3, 2022) (PAGA Action) • Corrine L. Peters – 0.10 hour	0.10
Review Court’s Case Management Order # 1 (filed on September 16, 2022) (Class Action) • Jacquelyn Silva – 0.10 hour	0.10
Review Court’s Case Management Order # 1 (filed on September 16, 2022) (PAGA Action) • Jacquelyn Silva – 0.10 hour	0.10
Review Court’s Order Designating PAGA Representative Action as “Complex” Case (PAGA Action) • Jacquelyn Silva – 0.10 hour	0.10
Review Defendant K1 Speed’s (“Defendant”) Answer to Plaintiff’s Class Action Complaint (served on September 29, 2022), and Affirmative Defenses in Defendant’s Answer (Class Action) • Tara Zabehi – 1.20 hours	2.20

• Jacquelyn Silva – 1.00 hour	
Review Defendant’s Answer to Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act (served on September 29, 2022), and Affirmative Defenses in Defendant’s Answer (PAGA Action) • Tara Zabehi – 1.30 hours • Jacquelyn Silva – 0.90 hour	2.20
Review Defendant’s Notice of Posting Jury Fees (served on October 3, 2022) (Class Action) • Jacquelyn Silva – 0.10 hour	0.10
Review Defendant’s Notice of Posting Jury Fees (served on October 3, 2022) (PAGA Action) • Jacquelyn Silva – 0.10 hour	0.10
Review Defendant’s Notice of Posting of the Complex Case Fee (filed on October 4, 2022) (Class Action) • Jacquelyn Silva – 0.10 hour	0.10
Review Defendant K1 Speed, Inc.’s Notice of Posting of the Complex Case Fee (filed on October 4, 2022) (PAGA Action) • Jacquelyn Silva – 0.10 hour	0.10
Draft Plaintiff Harrison Bomtempo’s Notice of Posting Jury Fees (filed on October 5, 2022) (Class Action) • Jacquelyn Silva – 0.10 hour	0.10
Draft Plaintiff Harrison Bomtempo’s Notice of Posting Jury Fees (filed on October 5, 2022) (PAGA Action) • Jacquelyn Silva – 0.10 hour	0.10

Meet and Confer with Defendant's Counsel and Draft and Review Joint Initial Status Conference Statement (filed on October 18, 2022) (Class Action) • Tara Zabehe – 0.60 hour • Jacquelyn Silva – 0.50 hour	1.10
Meet and Confer with Defendant's Counsel and Draft and Review Joint Initial Status Conference Statement (filed on October 18, 2022) (PAGA Action) • Tara Zabehe – 0.30 hour • Jacquelyn Silva – 0.20 hour	0.50
Review Court's Case Management Order # 2 (filed on October 19, 2022) (Class Action) • Jacquelyn Silva – 0.10 hour	0.10
Review Court's Case Management Order # 2 (filed on October 19, 2022) (PAGA Action) • Jacquelyn Silva – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Case Management Conference (filed on December 22, 2022) (Class Action) • Jacquelyn Silva – 0.90 hour	0.90
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Case Management Conference (filed on December 22, 2022) (PAGA Action) • Jacquelyn Silva – 0.30 hour	0.30
Draft [Proposed] Order- Continue Case Management Conference (filed on December 22, 2022) (Class Action) • Jacquelyn Silva – 0.20 hour	0.20

Draft [Proposed] Order- Continue Case Management Conference (filed on December 22, 2022) (PAGA Action) Jacquelyn Silva – 0.10 hour	0.10
Review Court Order to Continue Case Management Conference (filed on December 29, 2022) (Class Action) Jacquelyn Silva – 0.10 hour	0.10
Review Court Order to Continue Case Management Conference (filed on December 29, 2022) (PAGA Action) Jacquelyn Silva – 0.10 hour	0.10
Review and Analyze Defendant’s Notice of Association of Counsel (served on May 18, 2023) (Class Action) Jacquelyn Silva – 0.10 hour	0.10
Review and Analyze Defendant’s Notice of Association of Counsel (served on May 18, 2023) (PAGA Action) Jacquelyn Silva – 0.10 hour	0.10
Review and Analyze Defendant’s Stipulation and Protective Order Regarding Confidential Information (filed on May 31, 2023) (Class Action) Jacquelyn Silva – 0.30 hour	0.30
Review and Analyze Defendant’s Stipulation and Protective Order Regarding Confidential Information (filed on May 31, 2023) (PAGA Action)	0.30

• Jacquelyn Silva – 0.30 hour	
Draft Plaintiff's Notice of Paying Complex Fee (filed on May 31, 2023) (PAGA Action) • Samantha Costa – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel and Draft and Review Joint Case Management Conference Statement (filed on September 25, 2023) (Class Action) • Jacquelyn Silva – 1.10 hours	1.10
Meet and Confer with Defendant's Counsel and Draft and Review Joint Case Management Conference Statement (filed on September 25, 2023) (PAGA Action) • Jacquelyn Silva – 1.10 hours	1.10
Review Court's Case Management Order # 3 (filed on September 26, 2023) (Class Action) • Jacquelyn Silva – 0.10 hour	0.10
Review Court's Case Management Order # 3 (filed on September 26, 2023) (PAGA Action) • Jacquelyn Silva – 0.10 hour	0.10
Review Court's Order Setting Hearing on Motion for Preliminary Approval (filed on November 3, 2023) (Class Action) • Jacquelyn Silva – 0.10 hour	0.10
Review Court's Order Setting Hearing on Motion for Preliminary Approval (filed on November 3, 2023) (PAGA Action) • Jacquelyn Silva – 0.10 hour	0.10

Meet and Confer with Defendant's Counsel and Draft and Review Joint Stipulation to Continue Case Management Conference (submitted on November 3, 2023) (Class Action) • Samantha Costa – 1.00 hour	1.00
Meet and Confer with Defendant's Counsel and Draft and Review Joint Stipulation to Continue Case Management Conference (submitted on November 3, 2023) (PAGA Action) • Samantha Costa – 1.00 hour	1.00
Review Court's Notice of Reassignment for All Purposes (filed on November 6, 2023) (Class Action) • Samantha Costa – 0.10 hour	0.10
Review Court's Notice of Reassignment for All Purposes (filed on November 6, 2023) (PAGA Action) • Samantha Costa – 0.10 hour	0.10
Review Court's Notice of Reassignment for All Purposes (filed on November 14, 2023) (Class Action) • Samantha Costa – 0.10 hour	0.10
Review Court's Notice of Reassignment for All Purposes (filed on November 14, 2023) (PAGA Action) • Samantha Costa – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Settlement; [Proposed] Order Thereon (filed on June 10, 2024) (Class Action) • Brian J. St. John – 0.40 hour • Ryan Slinger – 1.00 hour	1.40
Review Court's Order to Continue Hearing on Plaintiff's Motion for Preliminary Approval of Settlement (filed June 13, 2024) (Class Action)	0.10

• Ryan Slinger – 0.10 hour	
Draft Plaintiff's Notice of Entry of Order Joint Stipulation to Continue Hearing on Plaintiff's Motion for Preliminary Approval (filed on June 17, 2024) (Class Action) • Ryan Slinger – 0.10 hour	0.10
Meet and Confer with Defendant's Counsel and Draft Joint Stipulation to Vacate Hearing on Plaintiff's Motion for Preliminary Approval of Settlement; [Proposed] Order Thereon (filed on June 21, 2024) (PAGA Action) • Joanna Ghosh – 0.40 hour • Ryan Slinger – 1.00 hour	1.40
Research and Draft First Amended Consolidated Class Action Complaint for Damages and Enforcement Under the Private Attorneys General Act, Cal. Labor Code § 2698 Et Seq. (filed on June 28, 2024); Meet and Confer with Defendant's Counsel and Draft Joint Stipulation Granting Plaintiff Leave to File First Amended Complaint (submitted on June 21, 2024) (Class Action) • Edwin Aiwarzian – 0.60 hour • Ryan Slinger – 2.50 hours	3.10
Review Court Order Granting Plaintiff Leave to File First Amended Complaint (filed on June 28, 2024) (Class Action) • Ryan Slinger – 0.10 hour	0.10
Draft Plaintiff's Notice of Entry of Order Granting Plaintiff Leave to File First Amended Complaint (filed on July 2, 2024) (Class Action) • Ryan Slinger – 0.10 hour	0.10
Draft Plaintiff's Notice of Dismissal (filed on July 12, 2024) (PAGA Action)	0.20

• Ryan Slinger – 0.20 hour	
Review and Analyze Defendant’s Answer to Plaintiff’s First Amended Complaint (filed on July 29, 2024) (Class Action) • Ryan Slinger – 2.20 hours	2.20
Review Court’s Minute Order Adopting Tentative Ruling (filed September 11, 2024) (Class Action) • Ryan Slinger – 0.30 hour	0.30
Draft Plaintiff’s Notice of Entry of Order (filed on October 22, 2024) (Class Action) • Ryan Slinger – 0.10 hour	0.10
Appearances	
Prepare for and Attend Hearing on Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (September 11, 2024) • Ryan Slinger – 1.50 hours	1.50
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Harrison Bomtempo (May 13, 2022) • Edwin Aiwazian – 0.40 hour • Corrine L. Peters – 0.70 hour	1.10
Draft Plaintiff’s Form Interrogatories – General (Set One), Special Interrogatories (Sets One & Two), and Requests for Production of Documents (Set One) to Defendant (served on August 17, 2023) (Class Action) • Tara Zabehe – 1.00 hour • Jacquelyn Silva – 5.80 hours	6.80

Draft Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Sets One & Two), and Requests for Production of Documents (Set One) to Defendant (served on August 17, 2023) (PAGA Action) • Tara Zabehe – 2.10 hour • Jacquelyn Silva – 4.70 hours	6.80
Review and Analyze Defendant K1 Speed, Inc.'s Objections and Responses to Plaintiff Harrison Bomtempo's Form Interrogatories – General (Set One), Special Interrogatories, (Sets One & Two), and Requests for Production of Documents (Set One) (Class Action) • Tara Zabehe – 1.40 hour • Jacquelyn Silva – 2.80 hours	4.20
Review and Analyze Defendant K1 Speed, Inc.'s Objections and Responses to Plaintiff Harrison Bomtempo's Form Interrogatories – General (Set One), Special Interrogatories, (Sets One & Two), and Requests for Production of Documents (Set One) (PAGA Action) • Tara Zabehe – 1.00 hour • Jacquelyn Silva – 3.40 hours	4.40
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant K1 Speed, Inc., and Requests for Production of Documents (Organizational Structure; August 17, 2023) (Class Action) • Tara Zabehe – 0.30 hour • Jacquelyn Silva – 1.00 hours	1.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Job Duties; August 17, 2023) (Class Action) • Tara Zabehe – 0.50 hour • Jacquelyn Silva – 1.00 hour	1.50

Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant K1 Speed, Inc., and Requests for Production of Documents (Organizational Structure; August 17, 2023) (PAGA Action) • Tara Zabehe – 0.30 hour • Jacquelyn Silva – 1.00 hour	1.30
Draft Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (Job Duties; August 17, 2023) (PAGA Action) • Tara Zabehe – 0.60 hour • Jacquelyn Silva – 0.90 hour	1.50
Review and Analyze Defendant K1 Speed, Inc.'s Objection to Plaintiff's Notice of Taking Deposition of Defendant's Person Most Knowledgeable and Request for Production of Documents (Organizational Structure; served on September 7, 2023) (Class Action) • Tara Zabehe – 0.20 hour • Jacquelyn Silva – 0.50 hour	0.70
Review and Analyze Defendant K1 Speed, Inc.'s Objection to Plaintiff's Notice of Taking Deposition of Defendant's Person Most Knowledgeable and Request for Production of Documents (Job Descriptions; served on September 7, 2023) (Class Action) • Tara Zabehe – 0.30 hour • Jacquelyn Silva – 0.80 hour	1.10
Review and Analyze Defendant K1 Speed, Inc.'s Objection to Plaintiff's Notice of Taking Deposition of Defendant's Person Most Knowledgeable and Request for Production of Documents (Organizational Structure; served on September 18, 2023) (PAGA Action) • Tara Zabehe – 0.20 hour • Jacquelyn Silva – 0.50 hours	0.70

Review and Analyze Defendant K1 Speed, Inc.’s Objection to Plaintiff’s Notice of Taking Deposition of Defendant’s Person Most Knowledgeable and Request for Production of Documents (Job Descriptions; served on September 18, 2023) (PAGA Action) • Tara Zabehe – 0.30 hour • Jacquelyn Silva – 0.80 hour	1.10
Draft Plaintiff’s Amended Notice of Deposition of Person Most Knowledgeable at Defendant K1 Speed, Inc., and Requests for Production of Documents (Job Duties; filed on October 11, 2023) (PAGA Action) • Tara Zabehe – 0.30 hour • Jacquelyn Silva – 1.00 hour	1.30
Draft Plaintiff’s Amended Notice of Deposition of Person Most Knowledgeable at Defendant K1 Speed, Inc., and Requests for Production of Documents (Organizational Structure; filed on October 11, 2023) (Class Action) • Tara Zabehe – 0.30 hour • Jacquelyn Silva – 0.80 hour	1.10
Draft Plaintiff’s Amended Notice of Deposition of Person Most Knowledgeable at Defendant K1 Speed, Inc., and Requests for Production of Documents (Job Duties; filed on October 11, 2023) (PAGA Action) • Tara Zabehe – 0.30 hour • Jacquelyn Silva – 1.00 hour	1.30
Draft Plaintiff’s Amended Notice of Deposition of Person Most Knowledgeable at Defendant K1 Speed, Inc., and Requests for Production of Documents (Organizational Structure; filed on October 11, 2023) (PAGA Action) • Tara Zabehe – 0.30 hour • Jacquelyn Silva – 0.80 hour	1.10

Review and Analyze Defendant K1 Speed, Inc.’s Objection to Plaintiff’s Amended Notice of Taking Deposition of Defendant’s Person Most Knowledgeable and Request for Production of Documents (Job Duties; served on October 18, 2023) (Class Action) • Tara Zabehe – 0.20 hour • Jacquelyn Silva – 1.00 hour	1.20
Review and Analyze Defendant K1 Speed, Inc.’s Objection to Plaintiff’s Amended Notice of Taking Deposition of Defendant’s Person Most Knowledgeable and Request for Production of Documents (Organizational Structure; served on October 18, 2023) (Class Action) • Tara Zabehe – 0.20 hour • Jacquelyn Silva – 0.70 hour	0.90
Review and Analyze Defendant K1 Speed, Inc.’s Objection to Plaintiff’s Amended Notice of Taking Deposition of Defendant’s Person Most Knowledgeable and Request for Production of Documents (Job Duties; served on October 18, 2023) (PAGA Action) • Tara Zabehe – 0.20 hour • Jacquelyn Silva – 1.00 hour	1.20
Review and Analyze Defendant K1 Speed, Inc.’s Objection to Plaintiff’s Amended Notice of Taking Deposition of Defendant’s Person Most Knowledgeable and Request for Production of Documents (Organizational Structure; served on October 18, 2023) (PAGA Action) • Tara Zabehe – 0.20 hour • Jacquelyn Silva – 0.70 hour	0.90
Letters and Correspondence	
Draft Notice of California Labor and Workforce Development Agency re: Claims of Plaintiff Under the Private Attorneys General Act (served on May 26, 2022)	4.50

• Edwin Aiwazian – 4.50 hours	
Meet With, Draft Correspondence to, and Respond to Correspondence from, Defendant’s Counsel • Tara Zabehe – 2.10 hours • Hagit Goltzer – 1.10 hours • Jacquelyn Silva – 4.20 hours • Samantha Costa – 3.00 hours • Jeremy Stern – 2.20 hours • Ryan Slinger – 5.00 hours	17.60
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant, and Other Sources Prior to Mediation • Edwin Aiwazian – 7.50 hours • Hagit Goltzer – 24.60 hours • Samantha Costa – 35.40 hours	67.50
Prepare for Mediation, Including Researching Settlement Related Issues and Merits of Claims, Drafting the Mediation Brief, and Compiling the Mediation Exhibits in Support of Plaintiff’s Mediation Brief, and Performing Damages Analysis/Calculations (submitted on July 31, 2023) • Arby Aiwazian – 5.70 hours • Hagit Goltzer – 10.00 hours • Samantha Costa – 15.00 hours	30.70
Attend Mediation Session (August 7, 2023; Zoom Video Conference) • Arby Aiwazian – 6.50 hours • Samantha Costa – 3.00 hours	9.50

Review and Analyze Mediator’s Proposal • Tiffany Hyun – 1.00 hour • Hagit Goltzer – 0.50 hour • Samantha Costa – 0.50 hour	2.00
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement Agreement and Release (executed on August 5, 2024) and Notice of Class Action Settlement • Edwin Aiwazian – 4.50 hours • Jeremy Stern – 2.70 hours • Ryan Slinger – 17.30 hours	24.50
Law and Motion	
Research and Draft Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA Settlement Agreement, Declaration of Elizabeth Parker-Fawley in Support Thereof, Declaration of Plaintiff in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on August 19, 2024) (Class Action) • Joanna Ghosh – 1.00 hour • Elizabeth Parker-Fawley – 5.50 hours • Ryan Slinger – 15.00 hours	21.50
Draft [Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on September 25, 2024) (Class Action) • Elizabeth Parker-Fawley – 0.10 hour • Ryan Slinger – 0.20 hour	0.30
Draft [Further Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 2, 2024) (Class Action) • Elizabeth Parker-Fawley – 0.10 hour	0.30

• Ryan Slinger – 0.20 hour	
Draft [Further, Further Revised Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 2, 2024) (Class Action) • Elizabeth Parker-Fawley – 0.10 hour • Ryan Slinger – 0.20 hour	0.30
Review Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 10, 2024) (Class Action) • Ryan Slinger – 0.10 hour	0.10
Research and Draft Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement, Class Counsel Fees and Expenses, and Class Representative Service Award, Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Final Approval Order and Judgment, and Review Declaration of Settlement Administrator in Support Thereof (filed on January 24, 2025) (Class Action) • Joanna Ghosh – 1.00 hour • Yasmin Hosseini – 6.50 hours • Ryan Slinger – 18.00 hours	25.50
Research and Draft Plaintiff's Revised Motion for Final Approval of Class Action and PAGA Settlement, Class Counsel Fees and Expenses, and Class Representative Service Award, Supplemental Declaration of Yasmin Hosseini in Support Thereof, and [Proposed] Final Approval Order and Judgment, and Review Declaration of Settlement Administrator in Support Thereof (filed on January 24, 2025) (Anticipated) (Class Action) • Yasmin Hosseini – 3.00 hours • Ryan Slinger – 5.00 hours	8.00
Total Hours:	326.30

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Bomtempo vs. K1 Speed Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/3/2022	U.S. Postmaster	Attorney Service	\$7.50
8/2/2022	Legal Document Server, Inc.	Attorney Service	\$112.36
8/2/2022	San Mateo Superior Court	Complex Filing Fee	\$1,000.00
8/2/2022	San Mateo Superior Court	Complex Filing Fee	\$435.00
8/26/2022	Legal Document Server, Inc.	Attorney Service	\$15.50
10/5/2022	Legal Document Server, Inc.	Attorney Service	\$52.88
10/5/2022	San Mateo Superior Court	Jury Fee	\$150.00
12/5/2022	First Mediation Corporation	Mediation Fee	\$10,000.00
12/22/2022	Legal Document Server, Inc.	Attorney Service	\$44.10
12/22/2022	San Mateo Superior Court	Stipulation & Order Fee	\$20.00
9/25/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
9/25/2023	Legal Document Server, Inc.	Attorney Service	\$15.57
11/3/2023	Legal Document Server, Inc.	Attorney Service	\$11.95
2/29/2024	Legal Document Server, Inc.	Attorney Service	\$29.04
2/29/2024	San Mateo Superior Court	Stipulation & Order Fee	\$20.00
6/11/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
6/11/2024	San Mateo Superior Court	Stipulation & Order Fee	\$20.00
6/17/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
6/24/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
6/24/2024	San Mateo Superior Court	Stipulation & Order Fee	\$20.00
7/1/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
7/2/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
8/20/2024	Legal Document Server, Inc.	Attorney Service	\$21.96
8/20/2024	San Mateo Superior Court	Motion Fee	\$90.00
9/26/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
10/3/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
10/11/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
10/24/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
Total:			<u>\$12,359.94</u>

LAWYERS for JUSTICE PC CASE COST DETAIL
Bomtempo vs. K1 Speed Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
5/26/2022	U.S. Postmaster	Postage	\$16.00
5/26/2022	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
8/2/2022	Legal Document Server, Inc.	Attorney Service	\$44.86
8/2/2022	San Mateo Superior Court	Complex Filing Fee	\$435.00
8/26/2022	Legal Document Server, Inc.	Attorney Service	\$15.50
10/5/2022	Legal Document Server, Inc.	Attorney Service	\$11.75
10/5/2022	Legal Document Server, Inc.	Attorney Service	\$15.50
10/5/2022	Legal Document Server, Inc.	Attorney Service	\$25.63
10/5/2022	San Mateo Superior Court	Jury Fee	\$150.00
10/18/2022	Legal Document Server, Inc.	Attorney Service	\$15.50
10/18/2022	Legal Document Server, Inc.	Attorney Service	\$15.50
12/22/2022	Legal Document Server, Inc.	Attorney Service	\$16.85
12/22/2022	Legal Document Server, Inc.	Attorney Service	\$11.75
12/22/2022	Legal Document Server, Inc.	Attorney Service	\$15.50
12/22/2022	San Mateo Superior Court	Stipulation & Order Fee	\$20.00
6/1/2023	Legal Document Server, Inc.	Attorney Service	\$85.20
6/1/2023	San Mateo Superior Court	Complex Filing Fee	\$1,000.00
9/25/2023	Legal Document Server, Inc.	Attorney Service	\$15.57
9/25/2023	Legal Document Server, Inc.	Attorney Service	\$150.00
11/3/2023	Legal Document Server, Inc.	Attorney Service	\$11.95
6/24/2024	Legal Document Server, Inc.	Attorney Service	\$17.09
6/24/2024	San Mateo Superior Court	Stipulation & Order Fee	\$20.00
7/2/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
7/12/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
7/12/2024	Legal Document Server, Inc.	Attorney Service	\$11.95
7/15/2024	Legal Document Server, Inc.	Attorney Service	\$15.70
Total:			\$2,243.20