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**BLUMENTHAL NORDREHAUG BHOWMIK
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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

ALEXANDER BRICK, an individual, on
behalf of himself and on behalf of all persons
similarly situated,

Plaintiff,

vs.

CALIFORNIA HYDRONICS
CORPORATION, a California Corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 22CV018191

**DECLARATION OF KYLE
NORDREHAUG IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS SETTLEMENT**

Hearing Date: August 28, 2025
Hearing Time: 10:00 a.m.
Dept: 23
Judge: Hon. Michael Markman

1 **DECLARATION OF KYLE NORDREHAUG IN SUPPORT OF PLAINTIFF'S**
2 **MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT**

3 I, Kyle Nordrehaug, declare:

4 1. I am a partner of the law firm of Blumenthal Nordrehaug Bhowmik De Blouw
5 LLP ("BNBD"), counsel for Plaintiff Alexander Brick ("Plaintiff"). As such, I am fully
6 familiar with the facts, pleadings and history of this matter. The following facts are within my
7 own personal knowledge, and if called as a witness, I could testify competently to the matters
8 stated herein.

9 2. This declaration is being submitted in support of the Plaintiff's Motion for Final
10 Approval of Class Settlement. The settlement reached between Plaintiff, individually and on
11 behalf of all members of the Class, on the one hand, and Defendant California Hydronics
12 Corporation ("CHC" or "Defendant"), on the other hand, is set forth in the Class Action
13 Settlement Agreement ("Agreement").

14
15 **Experience of BNBD**

16 3. Over the course of the litigation, my firm has worked actively on this matter.
17 The firm credentials are reflected in the BNBD Resume, a true and correct copy of which is
18 attached hereto as Exhibit #1. Some of the major cases our firm has undertaken are also set
19 forth therein. BNBD has represented hundreds of thousands of employees in hundreds of legal
20 matters, including PAGA lawsuits and hundreds of employment class actions. BNBD's
21 practice is devoted almost entirely to the prosecution of wage and hour class action and PAGA
22 action matters. The attorneys at BNBD have been appointed lead counsel in hundreds of
23 contested motions for class certification including many consolidated wage and hour matters.
24 The attorneys at my firm have extensive experience in cases involving labor code violations
25 and overtime claims. BNBD has litigated similar overtime cases against other employers on
26 behalf of employees, including cases against Cigna, Walmart, Legoland, Sharp Healthcare,
27 Securitas, Okta, See's Candies, Walt Disney Resorts, El Pollo Loco, Panda Express, Universal

1 Protection, Mattress Firm, Total Renal, Liberty Mutual, Union Bank, Apple, Coventry Health
2 Care, Qualxserv, Union Bank, Marriott, Kaiser / Permanente, Walgreens, and California State
3 Automobile Association. My firm has been approved as class counsel by state and federal
4 courts in California in contested class certification motions, including approvals in this Court.
5 It is this level of experience which enabled the firm to undertake the instant matter and to
6 successfully combat the resources of the defendants and their capable and experienced counsel.
7 On account of the concerted and dedicated effort this case demanded in order to properly
8 handle and prosecute, BNBD was precluded from taking other cases, and in fact, had to turn
9 away other potential fee generating cases.

10 4. Blumenthal Nordrehaug Bhowmik De Blouw LLP was responsible for handling
11 the briefing and argument that resulted in the landmark ruling of *Sakkab v. Luxottica Retail N.*
12 *Am., Inc.*, 803 F.3d 425 (9th Cir. 2015). There, Blumenthal Nordrehaug Bhowmik De Blouw
13 LLP overcame opposition by Littler Mendelson and amici Curiae briefs submitted by Mayer
14 Brown LLP to persuade the Ninth Circuit of the importance of the substantive rights of the
15 State of California under the California Private Attorney General Act of 2004 ("PAGA").
16 BNBD took the lead on this case where the ruling was the reaffirmation of the PAGA statute
17 and the *Iskanian* rule. BNBD also has recently engaged in noted appellate work on the subject
18 of class actions in the California Court of Appeals resulting in the opinions handed down in
19 *Securitas Sec. Services USA, Inc. v. Superior Court*, 234 Cal. App. 4th 1109, 184 Cal. Rptr.
20 3d 568 (2015) (class or representative action waiver in an employment-related arbitration
21 agreement was unenforceable); *Altman v. Solarcity Corp.*, No. D067582, 2016 Cal. App.
22 Unpub. LEXIS 3536 (Ct. App. May 13, 2016) (same). In 2015, Blumenthal Nordrehaug
23 Bhowmik De Blouw LLP received an award from the Daily Journal for Top Appellate
24 Reversal, and I received an award from the Daily Journal as Top Labor & Employment
25 Attorney in 2016.

27 5. District Judge Irma Gonzales in a consolidated class action representing
28 hundreds of armed forces officers held that Blumenthal Nordrehaug Bhowmik De Blouw LLP

1 was "qualified counsel with extensive experience in class action litigation." *McPhail v. First*
2 *Command Fin. Planning, Inc.*, 247 F.R.D. 598, 611 (S.D. Cal. 2007). Examples of other
3 contested actions where class certification was granted Blumenthal Nordrehaug Bhowmik De
4 Blouw LLP and was appointed lead class counsel in wage and hour class actions in Federal
5 Court include *Schulz v. Qualxserv, LLC*, 2012 U.S. Dist. LEXIS 58561 (S.D. Cal. 2012);
6 *Dobrosky v. Arthur J. Gallagher Serv. Co., LLC*, No. EDCV 13-0646 JGB (SPx), 2014 U.S.
7 Dist. LEXIS 106345 (C.D. Cal. July 30, 2014); *Culley v. Lincare Inc.*, No. 2:15-cv-00081-
8 MCE-CMK, 2016 U.S. Dist. LEXIS 105704 (E.D. Cal. Aug. 10, 2016); *Nelson v. Avon Prods.*,
9 No. 13-cv-02276-BLF, 2015 U.S. Dist. LEXIS 51104 (N.D. Cal. Apr. 17, 2015); *Orozco v.*
10 *Illinois Tool Works*, U.S.D.C. Case No. 14-cv-02113-MCE, 2016 U.S. Dist. LEXIS 158115
11 (E.D. Cal. February 17, 2017); *Metrow v. Liberty Mutual*, U.S.D.C. Case No. EDCV 16-1133
12 JGB (C.D. Cal. May 1, 2017). Some examples of heavily contested State Court wage and hour
13 class actions where class certification was obtained and BNBD was appointed lead class
14 counsel include *El Pollo Loco Wage and Hour Cases*, Orange County Superior Court, JCCP
15 Case No. 4957 (July 30, 2018); *Torrento v. Lucile Packard Children's Hospital*, Santa Clara
16 County Superior Court Case No. 2016-1-CV-291035 (July 17, 2018); *Salem v. Alliance*, San
17 Bernardino Superior Court, Case No. CIVRS1401129 (March 8, 2016); *Rivers v. Veolia*,
18 Sonoma County Superior Court Case No. SCV 255350 (March 9, 2016); *Mathies v. Union*
19 *Bank*, San Francisco Superior Court Case No. CGC-10-498077 (Sept. 11, 2013); *Jefferson v.*
20 *Bottling Co, LLC*, Orange County Superior Court Case No. 30-2009-00180102-CU-OE-CXC
21 (Sept. 7, 2010); *Rangel v. Balboa Ambulance Co.*, 37-2008-00095700-CU-BT-CTL (Fe. 11,
22 2010); *Tan v. CSAA*, Orange County Superior Court, Case No. 30-2008-00231219 (Nov. 23,
23 2009).

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26 The Settlement Is Fair, Reasonable and Adequate:

27 6. Plaintiff was a non-exempt employee of Defendant during the relevant time
28 period. On June 9, 2022, Plaintiff filed with the LWDA and served on Defendant a notice

1 under Labor Code section 2699.3, stating that Plaintiff Johnson intended to serve as a proxy
2 of the LWDA to recover civil penalties on behalf of Aggrieved Employees for alleged Labor
3 Code violations (the “PAGA Notice”). The PAGA Notice alleged violations of California
4 Labor Code §§ 201, 202, 203, 204 et seq., 210, 218, 221, 226(a), 226.7, 227.3, 246, 510, 512,
5 558(a)(1)(2), 1194, 1197, 1197.1, 1198, 2802, California Code of Regulations, Title 8, Section
6 11040, Subdivision 5(A)-(B), California Code of Regulations, Title 8, Section 1 1070(14)
7 (Failure to Provide Seating), and Violation of the applicable Industrial Welfare Commission
8 Wage Order(s), and attached a copy of the complaint by Plaintiff Johnson as an exhibit to the
9 PAGA Notice.

10 7. On September 20, 2022, Plaintiff filed a class action in which alleges, *inter alia*,
11 that Defendant violated California state wage and hour laws and the California Business and
12 Professions Code Section 17200 *et seq.* as a result of Defendant’s California wage and hour policies
13 and practices. Specifically, Plaintiff alleged that Defendant committed the following violations:
14 (1) Failure to Pay Minimum Wages; (2) Failure to Pay Overtime Wages; (3) Failure to Provide
15 Required Meal Periods; (4) Failure to Provide Required Rest Periods; (5) Failure to Provide
16 Accurate Itemized Wage Statements; (6) Failure to Reimburse Employees for Required Expenses;
17 (7) Failure to Provide Wages When Due; (8) Failure to Pay Sick Pay Wages; and (9) Unfair
18 Competition in Violation of Business and Professions Code section 17200 et. seq. (“Class Action
19 Complaint”). On September 20, 2022, Plaintiff also filed a separate Complaint against CHC in
20 Alameda County Superior Court asserting a single cause of action under the Private Attorney’s
21 General Act of 2004, Labor Code Section 2698 et seq., Case No. 22-CV-018209, (“the PAGA
22 Complaint” or “the PAGA Action”). The PAGA Action is based on the same alleged Labor Code
23 violations as the Class Action Complaint. On March 7, 2023, the Alameda County Superior Court
24 consolidated the Class Action and the PAGA Action for all purposes under Alameda County
25 Superior Court Case No. 22-CV-018191. The Class Action Complaint and the PAGA Complaint
26 are together referred to herein as “the Operative Complaints.”
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1 8. On October 27, 2023, The Parties participated in their first all-day mediation
2 presided over by mediator Michael D. Young. Ultimately the parties were unable to resolve
3 the matter and returned to litigation. On July 16, 2024, the Parties attended their second all
4 day mediation with Michael D. Young which led to this Agreement to settle the Actions on
5 behalf of the Class for a Gross Settlement Amount of \$280,000.

6 9. In this case, the Settlement reached in the total non-reversionary amount of Two
7 Hundred Eighty Thousand Dollars (\$280,000) as the Gross Settlement Amount is the product
8 of substantial effort by the Parties and counsel should be approved as fair, reasonable and
9 adequate. The Settlement was the result of arms-length negotiations during mediation and
10 between experienced counsel. The Settlement was only reached after extensive factual and
11 legal investigation and research, careful evaluation of the respective parties' strengths and
12 weaknesses, and diligent negotiation efforts. The Settlement amount is a negotiated
13 compromise which took into account risks related to liability, damages, and all the defenses
14 asserted by Defendant. The risk that class certification would not be granted was an extremely
15 important consideration, as the denial of class certification would mean that the class would
16 receive nothing. The fear of retaliation and blacklisting makes it unlikely that absent class
17 certification, individuals would come forward to assert their rights individually. Although I
18 am of the opinion that a class can be certified, I also believe in the fairness of the settlement
19 that is based on factoring in the uncertainty and risks to Plaintiff involved in not prevailing on
20 one or more of the causes of action or theories alleged, the possibility of non-certification and
21 potential for appeals. Based on the foregoing data and our own independent investigation and
22 evaluation, I am of the opinion that the settlement with the Defendant for the consideration
23 and on the terms set forth in the Settlement Agreement is fair, reasonable, and adequate and is
24 in the best interest of the class in light of all known facts and circumstances, including the risk
25 of significant delay, the defenses asserted by Defendant, and numerous potential appellate
26 issues.
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1 10. From the inception of the case, Class Counsel has zealously represented the
2 interests of the Class. The settlement was obtained for the benefit of the Class, as opposed to
3 the individual Plaintiff. Class Counsel have been approved as class counsel in a number of
4 prior cases, have litigated numerous other class action cases, and are competent to represent
5 the Class.

6 11. Plaintiff and Class Counsel are adequate representatives in that they have no
7 conflicts with the Class and will adequately represent the class. Plaintiff and Class Counsel
8 have no relationship or financial connection with the proposed Administrator nor the proposed
9 *cy pres* beneficiary - Bay Area Legal Aid.

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12 Lodestar of BNBD

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14 12. In this case, the Settlement reached in the total non-reversionary Gross
15 Settlement Amount is the product of substantial effort by the Parties and counsel should be
16 approved as fair, reasonable and adequate. As part of the settlement, the parties agreed to an
17 award of attorneys' fees equal to 33.33% of the Gross Settlement Amount. In *Laffitte v. Robert*
18 *Half Int'l*, 1 Cal. 5th 480, 503 (2016), The California Supreme Court both (1) joined the
19 majority of federal and state courts in holding that when class action litigation establishes a
20 monetary fund for the benefit of the class members, the trial court in its equitable powers
21 awards class counsel a fee out of that fund, and (2) expressly approved of one-third as a
22 reasonable percentage in a contingent common fund class settlement. As such, under *Laffitte*,
23 the requested award set forth in the Agreement is within this range of reasonableness.

24 13. The contemporaneous billing records for BNBD evidence that through August
25 1, 2025, BNBD's current lodestar is \$57,690.00, with additional fees still to be incurred to
26 complete the approval and settlement process. From August 10, 2022 to August 1, 2025, my
27 firm worked on this matter for over 92 hours, with hourly rates for attorneys ranging from \$450
28 to \$995, resulting in a current lodestar for BNBD in the amount of \$57,690.00. A detailed

breakdown of the total fees and the services performed by the firm on this matter is attached hereto as Exhibit #2.

14. The rates charged by my firm are in line with the prevailing rates of attorneys in the local Southern California legal community for similar work and, if this were a commercial matter, these are the charges that would be made and presented to the client. My firm's hourly rates are based upon the Laffey Matrix with the appropriate 2% increase adjustment for Southern California. A true and correct copy of the current Laffey Matrix is attached hereto as Exhibit #3. These hourly rates have been approved by Court's throughout California, including the Courts in the Superior Court of California. The reasonableness of BNBD's hourly rates is further confirmed by comparing such rates with the rates of comparable counsel practicing complex and class litigation as detailed in the National Law Journal Billing Survey. See e.g. *Zest IP Holdings, LLC v. Implant Direct MFG., LLC*, 2014 U.S. Dist. LEXIS 167563 (S.D. Cal. 2014) (finding that "Mayer Brown's \$775 average billing rate for partners" and "Mayer Brown's \$543 average associate billing rate" are reasonable rates when compared within 21 other firms practicing in the Southern District of California.) This survey is useful to show that BNBD's rates are in line with the comparable rates of the defense counsel that opposes these types of class claims, such as Mayer Brown noted above who is defense counsel in cases currently being prosecuted by BNBD. In another example, Sheppard Mullin Richter & Hampton, who is opposing counsel in many cases prosecuted by BNBD, in years past charged rates as high as \$875 for partners and \$535 for associates. Similarly, Paul Hastings, another opposing counsel in these types of cases, historically charged between \$900 and \$750 for partners and \$755 and \$335 for associates. Thus, the rates charged by BNBD for comparable work are supported by these examples and are therefore reasonable.

Expenses of BNBD

15. BNBD incurred litigation expenses in the amount of \$16,859.44. These litigation expenses incurred by BNBD include the expenses incurred for filing fees, attorney

1 service charges (One Legal, Knox), expert fees (Berger), and mediation fees, all of which are
2 costs normally billed to and paid by the client. The details of the litigation expenses incurred
3 are set forth in Exhibit #2 attached hereto.
4

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

7 Executed this 1st day of August, 2025, at South Lake Tahoe, California.

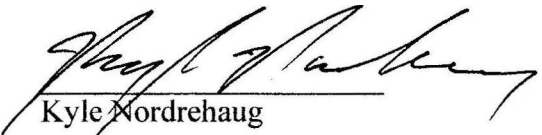
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10 Kyle Nordrehaug
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EXHIBIT #1

Blumenthal Nordrehaug Bhowmik De Blouw LLP

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Fax: (885) 551-1232

FIRM RESUME

Areas of Practice: Employee, Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation, Business Litigation.

ATTORNEY BIOGRAPHIES

Norman B. Blumenthal

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Action, Civil Litigation, Wage and Hour Class Actions, Transactional Law

Admitted: 1973, Illinois; 1976, California

Biography: Law Clerk to Justice Thomas J. Moran, Illinois Supreme Court, 1973-1975, while on Illinois Court of Appeals. Instructor, Oil and Gas Law: California Western School of Law, 1981; University of San Diego School of Law, 1983. Sole Practitioner 1976-1987. Partner, Blumenthal & Ostroff, 1988-1995. Partner, Blumenthal, Ostroff & Markham, 1995-2001. Partner, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2018. Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP, 2018 - present.

Member: San Diego County, Illinois State and American Bar Associations; State Bar of California.

Educated: University of Wisconsin (B.A., 1970); Loyola University of Chicago (J.D., 1973);

Summer Intern (1971) with Harvard Voluntary Defenders

Kyle R. Nordrehaug

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation

Admitted: 1999, California

Biography: Associate, Blumenthal, Ostroff & Markham, 1999-2001. Associate, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Member: State Bar of California, Ninth Circuit Court of Appeals, Third Circuit Court of Appeals

Educated: University of California at Berkeley (B.A., 1994); University of San Diego School of Law (J.D. 1999)

Awards: Top Labor & Employment Attorney 2016; Top Appellate Reversal - Daily Journal 2015; Super Lawyer 2015-2018

Aparajit Bhowmik

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2006, California

Educated: University of California at San Diego (B.A., 2002); University of San Diego School of Law (J.D. 2006)

Biography: Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Awards: Rising Star 2015

Nicholas J. De Blouw

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2011, California

Educated: Wayne State University (B.A. 2008); California Western School of Law (J.D. 2011)

Piya Mukherjee

Associate Attorney

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2010, California

Educated: University of California, San Diego (B.S. 2006); University of Southern California, Gould School of Law (J.D. 2010)

Victoria Rivapalacio

Associate Attorney

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2011, California

Educated: University of California at San Diego (B.A., 2003); George Washington University Law School (J.D. 2010)

Ricardo Ehmman

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2018, California; 2004, Nevada

Educated: University of California, San Diego (B.A. 1998); Loyola Law School (J.D. 2001)

Jeffrey S. Herman

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2011, California; 2016 Arizona

Educated: University of Michigan (B.A. 2008); California Western School of Law (J.D. 2011)

Charlotte James

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

Educated: San Diego State University; California Western School of Law

Christine Levu

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2012, California

Educated: University of California, Irvine; California Western School of Law

Andrew Ronan

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

Educated: Arizona State University; University of San Diego School of Law

Scott Blumenthal

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, New Mexico

Educated: University of Southern California; California Western School of Law

Sergio Julian Puche

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2013, California

Educated: University of California, Irvine; California Western School of Law

Trevor Moran

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, California

Educated: University of Rhode Island; California Western School of Law

Adolfo Sanchez Contreras

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2024, California; 2014, Mexico

Educated: The Juarez University

Brooke Wilkinson Waldrop

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2017, California;

Educated: Westminster University (B.A. 2004); University of Utah (J.D. 2008)

REPORTED CASES

Sakkab v. Luxottica Retail N. Am., Inc., 803 F.3d 425 (9th Cir. 2015) (The panel reversed the district court's order granting Luxottica Retail North America, Inc.'s motion to compel arbitration of claims and dismissing plaintiff's first amended complaint, in a putative class action raising class employment-related claims and a non-class representative claim for civil penalties under the Private Attorney General Act.);

Securitas Security Services USA, Inc. v. Superior Court, 234 Cal. App. 4th 1109 (Cal. Feb. 27, 2015) (Court of Appeal concluded the trial court correctly ruled that *Iskanian* rendered the PAGA waiver within the parties' dispute resolution agreement unenforceable. However, the Court of Appeal then ruled the trial court erred by failing to invalidate the non-severable class action waiver from the agreement and remanded the entire complaint, including class action and PAGA claims, be litigated in the Superior Court);

Sussex v. United States Dist. Court for the Dist. of Nev., 781 F.3d 1065 (9th Cir. 2015) (The panel determined that the district court clearly erred in holding that its decision to intervene mid-arbitration was justified under *Aerojet-General*. Specifically, the panel held that the district court erred in predicting that an award issued by the arbitrator would likely be vacated because of his "evident partiality" under 9 U.S.C. § 10(a)(2).);

Provost v. YourMechanic, Inc., 2020 Cal. App. Lexis 955 (Oct. 15, 2020) (Court of Appeals affirmed denial of arbitration of PAGA claim, and held in a case of first impression, that there was

no additional standing rules for PAGA claim brought by independent contractor); In re Tobacco Cases II, 41 Cal. 4th 1257 (2007); Washington Mutual Bank v. Superior Court, 24 Cal. 4th 906 (2001); Rocker v. KPMG LLP, 148 P.3d 703; 122 Nev. 1185 (2006); PCO, Inc. v. Christensen, Miller, Fink, Jacobs, Glaser, Weil & Shapiro, LLP, 150 Cal. App. 4th 384 (2007); Hall v. County of Los Angeles, 148 Cal. App. 4th 318 (2007); Coshov v. City of Escondido, 132 Cal. App. 4th 687 (2005); Daniels v. Philip Morris, 18 F.Supp 2d 1110 (S.D. Cal.1998); Gibson v. World Savings & Loan Asso., 103 Cal. App. 4th 1291 (2003); Jordan v. Department of Motor Vehicles, 75 Cal. App. 4th 445 (1999); Jordan v. Department of Motor Vehicles, 100 Cal.App. 4th 431 (2002); Norwest Mortgage, Inc. v. Superior Court, 72 Cal.App.4th 214 (1999); Hildago v. Diversified Transp. Sya, 1998 U.S. App. LEXIS 3207 (9th Cir. 1998); Kensington Capital Mgal. v. Oakley, Inc., 1999 U.S. Dist LEXIS 385; Fed.Sec.L.Rep. (CCH) P90, 411 (1999 C.D. Cal.); Lister v. Oakley, Inc., 1999 U.S. Dist. LEXIS 384; Fed. Sec. L. Rep. (CCH) P90,409 (C.D Cal. 1999); Olszewski v. Scripps Health, 30 Cal. 4th 798 (2003); Steroid Hormone Product Cases, 181 Cal. App. 4th 145 (2010); Owen v. Macy's, Inc., 175 Cal. App. 4th 462 (2009); Taiheiyo Cement Corp. v. Superior Court, 117 Cal. App. 4th 380 (2004); Taiheiyo Cement Corp. v. Superior Court, 105 Cal.App. 4th 398 (2003); McMeans v. Scripps Health, Inc., 100 Cal. App. 4th 507 (2002); Ramos v. Countrywide Home Loans, 82 Cal.App. 4th 615 (2000); Tevssier v. City of San Diego, 81 Cal.App. 4th 685 (2000); Washington Mutual Bank v. Superior Court, 70 Cal. App. 4th 299 (1999); Silvas v. E*Trade Mortg. Corp., 514 F.3d 1001 (9th Cir. 2008); Silvas v. E*Trade Mortg. Corp., 421 F. Supp. 2d 1315 (S.D. Cal. 2006); McPhail v. First Command Fin. Planning, Inc., 2009 U.S. Dist. LEXIS 26544 (S.D. Cal. 2009); McPhail v. First Command Fin. Planning, Inc., 251 F.R.D. 514 (S.D. Cal. 2008); McPhail v. First Command Fin. Planning, Inc., 247 F.R.D. 598 (S.D. Cal. 2007); Barcia v. Contain-A-Way, Inc., 2009 U.S. Dist. LEXIS 17118 (S.D. Cal. 2009); Barcia v. Contain-A-Way, Inc., 2008 U.S. Dist. LEXIS 27365 (S.D. Cal. 2008); Wise v. Cubic Def. Applications, Inc., 2009 U.S. Dist. LEXIS 11225 (S.D. Cal. 2009); Gabisan v. Pelican Prods., 2009 U.S. Dist. LEXIS 1391 (S.D. Cal. 2009); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin. Nat'l Marine Fisheries Serv., 630 F. Supp. 2d 1222 (S.D. Cal. 2009); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin. Nat'l Marine Fisheries Serv., 2008 U.S. Dist. LEXIS 102380 (S.D. Cal. 2008); Louie v. Kaiser Found. Health Plan, Inc., 2008 U.S. Dist. LEXIS 78314 (S.D. Cal. 2008); Weltman v. Ortho Mattress, Inc., 2010 U.S. Dist. LEXIS 20521 (S.D. Cal. 2010); Weltman v. Ortho Mattress, Inc., 2008 U.S. Dist. LEXIS 60344 (S.D. Cal. 2008); Curry v. CTB McGraw-Hill, LLC, 2006 U.S. Dist. LEXIS 5920; 97 A.F.T.R.2d (RIA) 1888; 37 Employee Benefits Cas. (BNA) 2390 (N.D. Cal. 2006); Reynov v. ADP Claims Servs. Group, 2006 U.S. Dist. LEXIS 94332 (N.D. Cal. 2006); Kennedy v. Natural Balance Pet Foods, Inc., 2010 U.S. App. LEXIS 248 (9th Cir. 2010); Kennedy v. Natural Balance Pet Foods, Inc., 2008 U.S. Dist. LEXIS 38889 (S.D. Cal. 2008); Kennedy v. Natural Balance Pet Foods, Inc., 2007 U.S. Dist. LEXIS 57766 (S.D. Cal. 2007); Sussex v. Turnberry/MGM Grand Towers, LLC, 2009 U.S. Dist. LEXIS 29503 (D. Nev. 2009); Picus v. Wal-Mart Stores, Inc., 256 F.R.D. 651 (D. Nev. 2009); Tull v. Stewart Title of Cal., Inc., 2009 U.S. Dist. LEXIS 14171 (S.D. Cal. 2009); Keshishzadeh v. Gallagher, 2010 U.S. Dist. LEXIS 46805 (S.D. Cal. 2010); Keshishzadeh v. Arthur J. Gallagher Serv. Co., 2010 U.S. Dist. Lexis 116380 (S.D. Cal. 2010); In re Pet Food Prods. Liab. Litig., MDL Docket No. 1850 (All Cases), 2008 U.S. Dist. LEXIS 94603 (D.N.J. 2008); In re Pet Food Prods. Liab. Litig., 629 F.3d 333 (3rd Cir. 2010); Puentes v. Wells Fargo Home Mortgage, Inc., 160 Cal. App. 4th 638 (2008); Rezec v. Sony Pictures Entertainment, Inc., 116 Cal. App. 4th 135 (2004); Badillo v. Am. Tobacco Co., 202 F.R.D. 261 (D. Nev. 2001); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin., 2010 U.S. App. Lexis 23025 (9th Cir. 2010); Dirienzo v. Dunbar Armored, Inc., 2011 U.S. Dist. Lexis 36650 (S.D. Cal. 2011); Rix v. Lockheed Martin Corp., 2011 U.S. Dist Lexis 25422 (S.D. Cal. 2011); Weitzke v. Costar Realty Info., Inc., 2011 U.S. Dist Lexis 20605 (S.D. Cal. 2011); Goodman v. Platinum Condo. Dev., LLC, 2011 U.S. Dist. LEXIS 36044 (D. Nev. 2011); Sussex v. Turnberry/MGM Grand Towers, LLC, 2011 U.S. Dist. LEXIS 14502 (D. Nev 2011); Smith v. Kaiser Foundation Hospitals, Inc., 2010 U.S. Dist. Lexis 117869 (S.D. Cal. 2010); Dobrosky v. Arthur J. Gallagher Serv. Co.,

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18CV321677; Shahbazian v. Fast Auto Loans, Inc. – U.S. District Court, Central District of California, Case No. 2:18-cv-03076-ODW-KS; Salazar v. Johnson & Johnson Consumer Inc. – Los Angeles County Superior Court, Case No. BC702468; Conti v. L’Oreal USA S/D, Inc. – U.S. District Court, Eastern District of California, Fresno, Case No. 1:19-CV-00769-LJO-SKO; Mercado v. Security Industry Specialists, Inc. – Santa Clara County Superior Court, Case No. 17CV320059; Vikili v. Dignity Health – San Francisco County Superior Court, Case No. CGC-18-569456; Bagby v. Swissport SA, LLC – Los Angeles County Superior Court, Case No. BC691058; Henry v. Motion Entertainment Group, LLC – San Francisco County Superior Court, Case No. CGC18565643; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Lanuza v. AccentCare, Inc. – San Francisco County Superior Court, Case No. CGC-18-565521; Thomas v. Easy Driving School, LLC – San Diego County Superior Court, Case No. 37-2018-00047639-CU-OE-CTL; Erickson v. Erickson – Contra Costa County Superior Court, Case No. MSC18-00307; Martin v. Menzies Aviation (USA) Inc. – San Francisco County Superior Court, Case No. CGC-18-566072; Mortimer v. Healthsouth Bakersfield Rehabilitation Hospital, LLC – Kern County Superior Court, Case No. BCV-18-102761; Alcaraz v. Red Lion Hotels Corporation – San Francisco County Superior Court, Case No. CGC-18-570310; Calhoun v. Total Transportation and Distribution, Inc. – San Diego County Superior Court, Case No. 37-2018-00058681-CU-OE-CTL; Rataul v. Overton Security Services, Inc. – Alameda County Superior Court, Case No. RG18891882; Beltran v. Compass Bank – San Diego County Superior Court, Case No. 37-2019-00024475-CU-OE-CTL; Kirshner v. Touchstone Golf, LLC – San Diego County Superior Court, Case No. 37-2018-00028865-CU-OE-CTL; Pizarro v. The Home Depot, Inc. – U.S. District Court for the Northern District of Georgia-Atlanta Division; Hatanaka v. Restore Rehabilitation, LLC – San Diego County Superior Court, Case No. 37-2018-00034780-CU-OE-CTL; Faria v. Carriage Funeral Holdings, Inc. – Contra Costa County Superior Court, Case No. MSC18-00606; Ontiveros v. Baker Concrete Construction, Inc. – Santa Clara County Superior Court, Case No. 18CV328679; Morales v. Redlands Automotive Services, Inc. – San Bernardino County Superior Court, Case No. CIVDS1807525; Ramirez v. Carefusion Resources, LLC – U.S. District Court, Southern District of California; Amster v. Starbucks Corporation – San Bernardino Superior Court, Case No. CIVDS1922016; Kutzman v. Derrel’s Mini Storage, Inc. – U.S. District, Eastern District of California, Case No. 1:18-cv-00755-AWI-JLT; Marks v. Universal Propulsion Company, Inc. – Solano County Superior Court, Case No. FCS051608; Martinez v. Geil Enterprises, Inc. – Fresno County Superior Court, Case No. 17CECG01480; Teniente v. Cirrus Asset Management, Inc. – Los Angeles County Superior Court, Case No. 20STCV16302; Blackshear v. California Fine Wine & Spirits LLC – Sacramento County Superior Court, Case No. 34-2018-00245842; Warnick v. Golden Gate America West LLC – Los Angeles County Superior Court, Case No. BC714176; Bennett v. Dnata Aviation USA, Inc. – San Francisco County Superior Court, Case No. CGC-18-566911; George v. PF Stockton Fitness LLC – Sacramento County Superior Court, Case No. 34-2019-00261113-CU-OE-GDS; Oshana v. Farmers and Merchants Bank of Central California – Stanislaus County Superior Court, Case No. CV-19-003427; Vasquez v. Packaging Corporation of America, – U.S. District Court, California Central District, Case No. 2:19-cv-01935-PSG-PLA; Palomino v. Zara USA Inc. – Orange County Superior Court, Case No. 30-2018-00992682-CU-OE-CXC; Simmons v. Joe & The Juice LA, LLC – San Francisco County Superior Court; Pacia v. CIM Group, L.P. – Los Angeles County Superior Court, Case No. BC709666; Flores v. Plastic Express – Los Angeles County Superior Court, Case No. BC71971; Madera v. William Warren Properties, Inc. – Orange County Superior Court, Case No. 30-2019-01055704-CU-OE-CXC; Hernandez v. Quality Custom Distribution – Orange County Superior Court, Case No. 30-2018-01010611-CU-OE-CXC; Arango v. Schlumberger Technology Corporation – Orange County Superior Court, Case No. 30-2019-01056839-CU-OE-CXC; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Ramirez v. J E H Enterprises, Inc. – San Francisco County Superior Court, Case No. CGC-19-574691; Sullen v. First Service Residential California, LLC – San Francisco County Superior Court, Case No. CGC-19-575131; Valentino v. East Bay Tire Co. –

Solano County Superior Court, Case No. FCS053067; Murphy v. Rockler Retail Group, Inc. – Sacramento Superior Court, Case No. 34-2019-00251220; Shahbazian v. Onewest Bank – Los Angeles County Superior Court, Case No. 19STCV23722; Bruemmer v. Tempur Retail Stores LLC – Marin County Superior Court, Case No. CIV1803646; Antonios v. Interface Rehab, Inc. – Orange County Superior, Case No. 30-2019-01067547-CU-OE-CXC; Tavallodi v. DC Auto, Inc. – San Bernardino, Case No. CIVDS1833598; Miranda v. The Lloyd Pest Control Co. – San Diego County Superior Court, Case No. 37-2018-00052510-CU-OE-CTL; Soenardi v. Magnussen Imports, Inc. – Santa Clara County Superior Court, Case No. 18CV340003; Thai v. Team Industrial Services, Inc. – Los Angeles County Superior Court, Case No. 19STCV21953; Castillo v. A.J. Kirkwood & Associates, Inc. – Los Angeles County Superior Court, Case No. 19STCV04435; Moss v. Jabil Inc. – Alameda County Superior Court, Case No. HG20050536; Billosillo, Jr. v. Crown Energy Services, Inc. – San Diego County Superior Court, Case No. 37-2018-00058254-CU-OE-CTL; Tarkington v. Freetime, Inc. – San Diego County Superior Court, Case No. 37-2019-00011473-CU-OE-CTL; McIntyre v. J.J.R. Enterprises, Inc. – Sacramento County Superior Court, Case No. 34-2019-00251220; Bucur v. Pharmaca Integrative Pharmacy, Inc. – San Diego County Superior Court, Case No. 37-2019-00009409-CU-OE-CTL; Batin v. McGee Air Services, Inc. – Santa Clara County Superior Court, Case No. 19CV347733; Terry v. McGee Air Services, Inc. – King County Superior Court of Washington, Case No. 19-2-3321-5 KNT; Weiss v. Niznik Behavioral Health Resources, Inc. – San Diego County Superior Court, Case No. 37-2019-00039441-CU-OE-CTL; Cavada v. Inter-Continental Hotels Group, Inc. – U.S. District Court, Southern District of California, Case No. 3:19-cv-01675-GPC-AHG; Lesevic v. Spectraforce Technologies, Inc. – U.S. District Court, Northern District of California, Case No. 5:19-cv-03126-LHK; Mutchler v. Circle K Stores, Inc. – San Diego County Superior Court, Case No. 37-2020-00016331-CU-OE-CTL, Azima v. CSI Medical Group, – Santa Clara County Superior Court, Case No. 19CV345450; Porras v. Baypointe Enterprises, LLC – Los Angeles County Superior Court, Case No. 19STCV31015; Mitchell v. Mack Trucking, Inc. – San Bernardino County Superior Court, Case No. CIVDS1928334; Watts v. T.R.L. Systems, Incorporated – Orange County Superior Court, Case No. 30-2019-01102457-CU-OE-CXC; Price v. DMSD Restaurants Inc. – San Diego County Superior Court, Case No. 37-2019-00024062-CU-OE-CTL; Jacobs v. Nortek Security & Control LLC – San Diego County Superior Court, Case No. 37-2019-0019735-CU-OE-CTL; Gonzalez v. Hub International Midwest – San Bernardino County Superior Court, Case No. CIVDS1900463; Cisneros v. Bluepearl California, Inc. – San Mateo Superior Court, Case No. 19-CIV-05707; Garcia v. Gallagher Basset Services – San Bernardino Superior Court, Case No. CIVDS2004140; Callow v. Adventist Health System/West – Placer County Superior Court, Case No. SCV0043607; Dominguez v. Kimco Facility Services, LLC – Los Angeles County Superior Court, Case No. 19STCV37592; Searles v. Robert Heath Trucking, Inc. – Los Angeles County Superior Court, Case No. 19STCV30808; Rangel v. Pioneer Hi-Bred international, Inc. – Yolo County Superior Court, Case No. CV-19-1797; Ivon v. Sinclair Television of California, Humboldt County Superior Court, Case No. DR190699; Williams v. Henkels & McCoy, Inc. – San Bernardino County Superior Court, Case No. CIVDS2003888; Cano v. Larry Green Chrysler Jeep Dodge, Inc. – Riverside County Superior Court, Case No. BLC1900184; Lopez v. Cepheid – Santa Clara County Superior Court, Case No. 19CV358827; Hernandez v. Quick Dispense, Inc. – Los Angeles County Superior Court, Case No. 19STCV29405; Lopez v. Lacoste USA, Inc. – San Bernardino County Superior Court, Case No. CIVDS1914626; Duhe v. Hospital Couriers Nevada, LLC – Contra Costa County Superior Court, Case No. MSC19-01377; Law v. Sequoia Equities, Incorporated – Contra Costa Superior Court, Case No. C19-01925; Dvorak v. Rockwell Collins, Inc. – San Diego County Superior Court, Case No. 37-2019-00064397-CU-OE-CTL; Noguera v. Metal Container Corporation – Riverside County Superior Court, Case No. RIC2003235; Leon v. Miller Event Management, Inc. – San Luis Obispo Superior Court, Case No. 19CV-0435; Leon v. Miller Event Management, Inc. – San Luis Obispo County Superior Court, Case No. 19CV-0435, Camacho-Bias v. Serve U Brands Inc. – Butte County Superior Court, Case No. 20CV00603; La Pietra v. Entertainment Partners Services, LLC – Los Angeles County Superior

Court, Case No. 19STCV39529; Celis v. Theatre Box - San Diego, LLC – San Diego County Superior Court, Case No. _____; Ignacio v. Laboratory Corporation of America – U.S. District Court, California Central District, Case No. 2:19-cv-06079-AB-RAO; Kovnas v. Cahill Contractors LLC – Alameda County Superior Court, Case No. RG19037852; Hersh v. Mrs. Gooch's Natural Food – Los Angeles County Superior Court, Case No. 19STCV10444; Miller v. The Permanente Medical Group – Alameda County Superior Court, Case No. RG19045904; Vasquez v. Autoalert, LLC – Orange County Superior Court, Case No. 30-2019-01114549-CU-OE-CXC; Cavanaugh v. Morton Golf, LLC – Sacramento County Superior Court, Case No. 34-2019-00270176; Coley v. Monroe Operations, LLC – Alameda County Superior Court, Case No. RG20063188; Ramirez v. Sierra Aluminum Company – U.S. District Court, California Central District Court, Case No. 5:20-cv-00417-JGB-KK; Marrero v. Stat Med, P.C. – Alameda County Superior Court, Case No. HG19043214; Enriquez v. Solari Enterprises, Inc. – Los Angeles County Superior Court, Case No. 20STCV11129; Craig v. Hometown Heart – San Francisco County Superior Court, Case No. CGC-20-582454; Lopez v. Hy0Lang Electric California, Inc. – San Diego County Superior Court, Case No. 37-2020-00012543-CU-OE-CTL; Heuklom v. Clara Medical Group, P.C. – San Francisco County Superior Court, Case No. CGC-20-585918; Dominguez v. Lifesafer of Northern California – Monterey County Superior Court, Case No. 20CV002586; Kiseleva v. Totalmed Staffing Inc. – U.S. District Court, California Northern District, Case No. 5:19-cv-06480; Vires v. Sweetgreen, Inc. – Santa Clara County Superior Court, Case No. 20CV365918; Kim v. Wireless Vision, LLC – San Bernardino County Superior Court, Case No. CIVDS2000074; Senoren v. Air Canada Corporation – Los Angeles County Superior Court, Case No. 20STCV13942; Clark v. Quest Diagnostics Incorporated – San Bernardino County Superior Court, Case No. CIVDS2018707; Green v. Shipt, Inc. – Los Angeles County Superior Court, Case No. 20STCV01001; Respass v. The Scion Group LLC – Sacramento County Superior Court, Case No. 34-2020-00285265; Jackson v. Decathlon USA LLC – Alameda County Superior Court, Case No. RG2003024; Avacena v. FTG Aerospace Inc. – Los Angeles County Superior Court, Case No. 20STCV28767; Perez v. Butler America, LLC – Los Angeles County Superior Court, Case No. 20STCV20218; Christensen v. Carter's Retail, Inc. – Orange County Superior Court, Case No. 30-2020-01138792-CU-OE-CXC; Astudillo v. Torrance Health Association, Inc. – Los Angeles County Superior Court, Case No. 20STCV18424; Hansen v. Holiday AI Management Sub LLC – Contra Costa County Superior Court, Case No. CIVMSC20-00779; Almahdi v. Vitamin Shoppe Industries Inc – Santa Clara County Superior Court, Case No. 20CV365150; Krisinda v. Loyal Source Government Services LLC – U.S. District Court, California Southern District, Case No. 3:20-cv-879-LAB-NLS; Ettedgui v. WB Studio Enterprises Inc – U.S. District Court, California Central District, Case No. 2:20-CV-08053-MCS (MAAx); Fernandez v. Nuvision Federal Credit Union – Orange County Superior Court, Case No. 30-2020-01161691-CU-OE-CJC; Aviles v. UPS Supply Chain Solutions, Inc. – Riverside County Superior Court, Case No. RIC2000727; Alcocer v. DSV Solutions, LLC – San Bernardino Superior Court, Case No. CIVDS2010345; Wilson v. Wholesome Harvest Baking, LLC – U.S. District Court, California Northern District, Case No. 4:20-cv-05186-YGR; Gregory v. Verio Healthcare, Inc. – Los Angeles County Superior Court, Case No. 20STCV37254; Rose v. Impact Group, LLC – Orange County Superior Court, Case No. 30-2020-01141107-CU-OE-CXC; Monasterio v. Citibank, N.A. – San Mateo County Superior Court, Case No. 20-CIV-03650; Martinez-Lopez v. Medamerica, Inc. – San Diego County Superior Court, Case No. 37-2020-00034393-CU-OE-CTL; Cox v. PRB Management, LLC – Solano County Superior Court, Case No. FCS055514; Nash v. K. Hovnanian Companies, LLC – Riverside County Superior Court, Case No. RIC2003319; Kyler v. Harbor Freight Tools USA, Inc. – San Diego County Superior Court, Case No. 37-2020-00015828-CU-OE-CTL; Roberts v. Solantic Corporation – Los Angeles County Superior Court, Case No. 20STCV41117; Price v. Mistras Group, Inc. – Los Angeles County Superior Court, Case No. 20STCV22485; Macias v. ABM Electrical & Lighting Solutions, Inc. – San Diego County Superior Court, Case No. 37-2020-00024997-CU-OE-CTL; Basu-Kesselman v. Garuda Labs, Inc. – San Francisco County Superior Court, Case No. CGC-20-585229; Armstrong v. Prometric LLC – Los Angeles County Superior

Court, Case No. 20STCV29967; Ashlock v. Advantis Medical Staffing, LLC – San Diego County Superior Court, Case No. 37-2020-00022305-CU-OE-CTL; Wilson v. WXI Global Solutions, LLC – Los Angeles County Superior Court, Case No. 20STCV25007; Gandhale v. Select Rehabilitation, LLC – Monterey County Superior Court, Case No. 20CV002240; Starvoice v. G4S Secure Solutions (USA) Inc. – San Diego County Superior Court, Case No. 37-2020-00029421-CU-OE-CTL; Mbise v. Axlehire, Inc. – Alameda County Superior Court, Case No. RG20067350; Points v. C&J Services, Inc. – Kern County Superior Court, Case No. BCV-20-102483; Marshall v. PHI Air Medical, LLC – Lassen County Superior Court, Case No. 62973; Jauregui v. Cytotec Engineered Materials, Inc. – Orange County Superior Court, Case No. 30-2020-01164932-CU-OE-CXC

EXHIBIT #2

Blumenthal Nordrehaug Bhowmik DeBlouw LLP

2255 CALLE CLARA
LA JOLLA, CA - California 92037-3107

INVOICE

Invoice # 1
Date: 08/01/2025
Due On: 08/31/2025

Alex Brick
1920 Shropshire Street
Roseville, CA 95646

CA2662

California Hydronics Corporation

Services

Attorney	Date	Notes	Quantity	Rate	Total
SB	08/10/2022	Review complaint for filing, analyze, advise ND	2.60	\$450.00	\$1,170.00
SB	08/18/2022	Revise complaint for filing, advise ND	2.60	\$450.00	\$1,170.00
RE	09/14/2022	Review case notes & damage analysis	0.50	\$675.00	\$337.50
RE	09/14/2022	Review & analyze employment file documents/ 1198.5 response	1.50	\$675.00	\$1,012.50
RE	09/19/2022	Review, edit & finalize class action complaint draft	2.20	\$675.00	\$1,485.00
RE	09/19/2022	Draft PAGA only representative action complaint	3.00	\$675.00	\$2,025.00
RE	09/20/2022	Draft summons, civil case cover sheet; research local rules re civil case cover sheet addendum; prepare addendum re class case	0.50	\$675.00	\$337.50
RE	09/20/2022	Review class action complaint package; finalize and file in Alameda Sup. Ct.	0.70	\$675.00	\$472.50
RE	09/20/2022	Draft summons, civil case cover sheet; civil case cover sheet addendum re paga action	0.50	\$675.00	\$337.50
RE	09/20/2022	Review PAGA action complaint package; finalize and file in Alameda Sup. Ct.	0.70	\$675.00	\$472.50
RE	09/21/2022	Review court-returned documents; memo to firm re judicial/departement assignment and status of initial case management conference re class	0.50	\$675.00	\$337.50

		action			
RE	09/21/2022	Review court-returned documents; memo to firm re judicial/departement assignment and status of initial case management conference re paga action	0.50	\$675.00	\$337.50
RE	09/21/2022	Upload complaint to LWDA website; save confirmation for future verification of notice to LWDA	0.40	\$675.00	\$270.00
RE	09/23/2022	Prepare initial documents for service of process prepare Notice & Acknowledgement of Receipt re class action; email to defense counsel with service docs & NAR; instruct staff to mail hard copy per code	1.00	\$675.00	\$675.00
RE	09/23/2022	Prepare initial documents for service of process prepare Notice & Acknowledgement of Receipt re PAGA action; email to defense counsel with service docs & NAR; instruct staff to mail hard copy per code	1.00	\$675.00	\$675.00
RE	10/27/2022	Draft Proof of Service of Summons re PAGA action; attached executed Notice & Acknowledgment of Receipt; file; memo to firm re post service written discovery	0.60	\$675.00	\$405.00
RE	10/27/2022	Draft Proof of Service of Summons re class action; attached executed Notice & Acknowledgment of Receipt; file; memo to firm re post service written discovery	0.60	\$675.00	\$405.00
AR	10/28/2022	Review docket for tentative regarding complex determination hearing; draft correspondence with CTL regarding the same.	0.30	\$550.00	\$165.00
PM	12/08/2022	Review and analyze case documents and legal and factual issues; strategize re discovery.	1.50	\$750.00	\$1,125.00
VR	01/03/2023	Review and Analyze: review and analyze court's orders and docket; review complaint and case notes; advise PM	0.50	\$750.00	\$375.00
VR	01/04/2023	Review and Analyze: review correspondence between parties; review court's orders and docket; advise PM	0.50	\$750.00	\$375.00
VR	01/11/2023	meet and confer with defendant; review complaints and status of case; follow up	1.00	\$750.00	\$750.00
VR	01/25/2023	Draft: draft written discovery; review and revise belaire notice; review and analyze complaint and claims; advise PM	2.00	\$750.00	\$1,500.00
VR	02/06/2023	Review and Analyze: review and analyze court's orders and local rules; review CMC statement; advise PM	0.80	\$750.00	\$600.00

VR	02/22/2023	Review and Revise: review and revise stipulation re consolidation; review correspondence between counsel; review complaint and discovery; advise PM	1.60	\$750.00	\$1,200.00
PM	02/22/2023	Review correspondences and check on status of stipulation for consolidation; advise team re stipulation for consolidation.	0.50	\$750.00	\$375.00
VR	03/13/2023	Correspondence with Opposing Counsel: correspondence to Def re discovery and mediation; advise PM	0.30	\$750.00	\$225.00
PM	03/28/2023	Review Def. responses to discovery requests; review legal and factual theories.	1.50	\$750.00	\$1,125.00
VR	04/17/2023	telephone conference with Def re mediation and PMK deposition; review status of discovery; advise PM	1.10	\$750.00	\$825.00
VR	04/24/2023	Draft: review the court's docket and orders; review case file; review case notes; advise PM and GG; draft CMC statement	2.70	\$750.00	\$2,025.00
VR	04/24/2023	Review and Analyze: review and analyze court's orders; review stipulations; advise GG	0.70	\$750.00	\$525.00
VR	04/25/2023	Draft: draft joint CMC statement; review court's orders; review status of case; review discovery; advise PM	3.00	\$750.00	\$2,250.00
VR	05/02/2023	Review and Revise: review and revise joint CMC statement; correspondence to Def; finalize	3.10	\$750.00	\$2,325.00
VR	05/08/2023	Correspondence with Opposing Counsel: correspondence with Def re mediation and discovery; review discovery; advise PM	0.60	\$750.00	\$450.00
PM	05/10/2023	Review Def. responses to discovery; advise team re issues requiring meeting and conferring about.	1.50	\$750.00	\$1,125.00
PM	05/16/2023	Review and analyze Def. documents; strategize re claims; advise AJB.	2.50	\$750.00	\$1,875.00
PM	05/19/2023	Review Def. responses to discovery; advise CJ re meet and confer correspondence.	1.50	\$750.00	\$1,125.00
CJ	05/19/2023	Review status of discovery responses, prior correspondence, and meet and confer letter, determine timing for MTC and PMK depo	1.00	\$550.00	\$550.00
VR	05/30/2023	Draft: draft joint CMC statement; review status of case and mediation confirmation; review correspondence between parties; review and revise joint CMC statement	1.50	\$750.00	\$1,125.00
CJ	06/02/2023	Evaluate Plaintiff's docs, bates stamp, organize, create exhibits and add to Exhibit Book	1.50	\$550.00	\$825.00

CJ	06/02/2023	Evaluate Defendant's docs, organize, create exhibits and add to Exhibit Book, analyze for purposes of adding information to correspondence re mediation discovery	1.50	\$550.00	\$825.00
CJ	06/02/2023	Draft correspondence re mediation discovery	0.50	\$550.00	\$275.00
CJ	06/05/2023	Evaluate status of case and claims, review prior orders and CMO, determine whether CMC will go forward	0.75	\$550.00	\$412.50
PM	06/07/2023	Review status of action and discovery deadlines; email defense counsel re MTC deadline continuance; review docket and exhibit book.	1.00	\$750.00	\$750.00
CJ	06/12/2023	Review and evaluate correspondence from OPC re mediation data and documents, review data and documents received and sent PAGA letter to OPC	1.00	\$550.00	\$550.00
CJ	09/12/2023	Analyze complaint, evaluate case notes and analyze documents in preparation for mediation	1.00	\$550.00	\$550.00
CJ	09/12/2023	Review and analyze documents received to date in file, prepare to follow up with OPC	1.00	\$550.00	\$550.00
CJ	09/26/2023	Evaluate OPC position with respect to Protective Order, determine next steps, advise PM	0.75	\$550.00	\$412.50
CJ	09/26/2023	Draft protective order, revise, and sent to OPC	1.25	\$550.00	\$687.50
CJ	10/12/2023	Review case notes adn complaint, evaluate documents from Defendant	1.00	\$550.00	\$550.00
CJ	10/12/2023	Continue to evaluate documents from Defendant for purposes of preparing for mediation, create more exhibits for mediation	1.00	\$550.00	\$550.00
CJ	10/16/2023	Continue analysis of claims and docs and update mediation chart	1.00	\$550.00	\$550.00
CJ	10/16/2023	Evaluate data related to Plaintiff, prepare for call with Plaintiff	1.00	\$550.00	\$550.00
CJ	10/16/2023	T/c with Plaintiff, update case analysis sheet	1.00	\$550.00	\$550.00
SB	10/20/2023	Speak with client in advance of mediation, analyze claims, advise AJB	2.80	\$450.00	\$1,260.00
SB	10/23/2023	Calculate individual damages in advance of mediation, add to case notes, advise AJB	2.60	\$450.00	\$1,170.00
SB	10/24/2023	Prepare for mediation, review and analyze mediation brief, advise AJB	2.60	\$450.00	\$1,170.00
SB	10/27/2023	Attend mediation	8.00	\$450.00	\$3,600.00
CJ	10/31/2023	Review case adn claims, evaluate status of	1.00	\$550.00	\$550.00

mediation adn advise NDB adn PM					
CJ	11/02/2023	Analyze case and claims, review judge's CMO in prep for drafting Joint Report	1.00	\$550.00	\$550.00
PM	11/03/2023	Review draft CMC statement; advise CJ Re the same.	0.25	\$750.00	\$187.50
CJ	11/03/2023	Continue analysis of case adn claims, continue review of deadlines and discovery issues in prep for drafting joint report	1.00	\$550.00	\$550.00
CJ	11/03/2023	Draft Joint Report to Court, sent to OPC	1.00	\$550.00	\$550.00
CJ	11/06/2023	Finalize Joint Report, sent for filing	0.50	\$550.00	\$275.00
CJ	11/07/2023	Review status of case adn claims for purposes of communicating to co counsel	1.00	\$550.00	\$550.00
CJ	11/08/2023	Reviews docs received to date and whether will be used for litigation	1.00	\$550.00	\$550.00
PM	11/09/2023	Review emails and correspondences regarding discovery meet and confer letter; advise team re the same.	0.50	\$750.00	\$375.00
CJ	12/18/2023	Review compel deadline, advise co counsel and ensure discovery deadlines are calendared	0.50	\$550.00	\$275.00
CJ	01/11/2024	Research status of discovery, Plaintiff's docs produced to date and advise co-counsel	1.00	\$550.00	\$550.00
GG	01/24/2024	Check ROA for upcoming CMC	0.10	\$250.00	\$25.00
GG	07/25/2024	ROA review re upcoming CMC, confirm times	0.20	\$250.00	\$50.00
GG	11/27/2024	Reviewed ROA to confirm hearing re prelim approval and added info to events email.	0.10	\$250.00	\$25.00
KN	01/29/2025	draft declaration ISO motion; review draft motion; email co-counsel	1.00	\$950.00	\$950.00
GG	02/18/2025	Reviewed ROA re upcoming hearing re prelim. approval, added appearance to events email.	0.10	\$250.00	\$25.00
GG	03/19/2025	Reviewed case file and ROA to confirm upcoming hearing re motion for prelim approval, and added information to events email.	0.10	\$250.00	\$25.00
KN	08/01/2025	Draft declaration ISO final approval; finalize billing; final declaration and email co-counsel	2.00	\$950.00	\$1,900.00
Quantity Subtotal				92.7	
Services Subtotal				\$57,690.00	

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	06/09/2022	PAGA Filing Fee	1.00	\$75.00	\$75.00
Expense	09/21/2022	Court/Onelegal Fees	1.00	\$1,497.36	\$1,497.36
Expense	09/21/2022	Court/Onelegal Fees	1.00	\$467.86	\$467.86
Expense	09/24/2022	Court fee for document on docket	1.00	\$1.00	\$1.00
Expense	04/25/2023	legal research; download docs from Oakland docket	1.00	\$10.00	\$10.00
Expense	05/02/2023	court filing via One Legal	1.00	\$20.49	\$20.49
Expense	05/30/2023	filing via One Legal	1.00	\$20.49	\$20.49
Expense	05/31/2023	Mediation Fees - Judicate West - Michael Young	1.00	\$8,375.00	\$8,375.00
Expense	05/31/2023	Knox	1.00	\$116.75	\$116.75
Expense	11/07/2023	One Legal filing fee	1.00	\$20.49	\$20.49
Expense	11/14/2023	Berger Consulting Fees.	1.00	\$6,255.00	\$6,255.00
Expenses Subtotal					\$16,859.44

Time Keeper	Quantity	Rate	Total
Scott Blumenthal	21.2	\$450.00	\$9,540.00
Ricardo Ehmann	14.2	\$675.00	\$9,585.00
Charlotte James	23.25	\$550.00	\$12,787.50
Piya Mukherjee	10.75	\$750.00	\$8,062.50
Kyle Nordrehaug	3.0	\$950.00	\$2,850.00
Victoria Rivapalacio	19.4	\$750.00	\$14,550.00
Andrew Ronan	0.3	\$550.00	\$165.00
Gerardo Galaviz	0.6	\$250.00	\$150.00
Quantity Total			92.7
Subtotal			\$74,549.44
Total			\$74,549.44

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1	08/31/2025	\$74,549.44	\$0.00	\$74,549.44
Outstanding Balance				\$74,549.44
Total Amount Outstanding				\$74,549.44

Please make all amounts payable to: Blumenthal Nordrehaug Bhowmik DeBlouw LLP

Please pay within 30 days.

EXHIBIT #3

LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389

6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

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

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

PROOF OF SERVICE

I, the undersigned, declare that I am over the age of eighteen years and not a party to the case. My business address is 10650 Treena Street, Suite 212, San Diego, California, 92131. On Monday, August 4, 2025, I served a copy of the following documents:

- 1) **MOTION FOR FINAL APPROVAL – NOTICE**
- 2) **MOTION FOR FINAL APPROVAL – MEMO OF P & A**
- 3) **MOTION FOR FINAL APPROVAL – DECLARATION OF NORDREHAUG**
- 4) **MOTION FOR FINAL APPROVAL – DECLARATION OF WEBB**
- 5) **MOTION FOR FINAL APPROVAL – DECLARATION OF NEVELS**
- 6) **MOTION FOR FINAL APPROVAL – DECLARATION OF PHOENIX**
- 7) **MOTION FOR FINAL APPROVAL – [PROPOSED] JUDGMENT**

[X] By Electronic Service: Based on a court order, Code of Civil Procedure Section 1010.6 and California Rules of Court Rule 2.251, or an agreement of the parties to accept electronic service. I caused the above documents to be sent to the person(s) at the e-mail address(es) set forth below.

[] By Mail: I placed the envelope for collection and mailing at the address(es) below, following our ordinary business practices. I am readily familiar with this firm's business practice for collecting and processing correspondence for mailing, on the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at San Diego, California.

Mark L. Jacuzzi (SBN 173220)
Sarah E. Lucas (SBN 148713)
**SIMPSON GARRITY INNES &
JACUZZI PC**
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Email: Norm@BamLawCa.com
Email: Kyle@BamLawCa.com
Attorneys for Plaintiff

**LABOR WORKFORCE
DEVELOPMENT AGENCY**
Proposed Settlement of PAGA case online
filing through: <https://dir.govfa.net/432>

1 I declare under penalty of perjury under the laws of the State of California that the above
2 is true and correct. Executed on Monday, August 4, 2025, at San Diego, California.

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4 _____
5 NOAH ADAMS
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