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SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA

CIVIL UNLIMITED DIVISION

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

Plaintiffs,

vs.

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

Defendants.

CASE NO. 22CV018191

**DECLARATION OF LENDEN F. WEBB
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS SETTLEMENT**

*Assigned for All Purposes to Dept. 23
Hon. Michael Markman*

Date: August 28, 2025
Time: 10:00 a.m.
Dept: 23

I, Lenden F. Webb, state and declare:

1. I am the Managing Shareholder of Webb Law Group, APC, counsel of record for Plaintiff ALEXANDER BRICK and others similarly situated (collectively "Plaintiffs") in this matter. I am fully familiar with the facts, pleadings and history of this matter. The following facts are within my own personal knowledge, and if called as a witness, I could testify competently to the matters stated herein.
2. This declaration is being submitted in support of the Motion for Preliminary Approval of the Settlement in this matter.
3. All of the facts contained within this declaration are within my personal knowledge, and, if called as a witness, I could and would competently testify thereto.

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FAIRNESS OF SETTLEMENT

4. As consideration for the Settlement, the gross Settlement Amount will be \$280,000.00. The Gross Settlement Amount will settle all issues pending in the Actions between the Parties and will be made in full and final settlement of the Released Class Claims and Released PAGA Claims. The Gross Settlement Amount includes all payments to the Individual Class Payment, the Individual PAGA Payment, LWDA PAGA Payment, Administration Expenses Payment, Class Counsel Fees Payment, and the Representative Service Payments.
5. The relief provided in the Settlement will benefit all members of the Class. The Settlement does not grant preferential treatment to Plaintiffs or segments of the Class in any way. Payments to the Class Members are all determined under a neutral methodology. Each Participating Class Member will receive the same opportunity to participate in and receive payment through a neutral formula that is based upon the weeks worked by that individual.
6. On October 27, 2023, Plaintiff and Defendants attended a mediation with Michael D. Young, a well-respected local mediator. Ultimately the parties were unable to resolve the matter and returned to litigation. On July 16, 2024, the Parties attended their second all day mediation with Michael D. Young which led to this Agreement to settle the Actions.

PROCEDURAL HISTORY OF THE CASE

7. On September 20, 2022, Plaintiff commenced this Action by filing a Class Action Complaint alleging causes of action against CHC for (1) Failure to Pay Minimum Wages; (2) Failure to Pay Overtime Wages; (3) Failure to Provide Required Meal Periods; (4) Failure to Provide Required Rest Periods; (5) Failure to Provide Accurate Itemized Wage Statements; (6) Failure to Reimburse Employees for Required Expenses; (7) Failure to Provide Wages When Due; (8) Failure to Pay Sick Pay Wages; and (9) Unfair Competition in Violation of Business and Professions Code section 17200 et. seq. ("Class Action Complaint"). CHC denies the allegations in the Class Action Complaint, denies

any failure to comply with the laws identified in in the Class Action Complaint and denies any and all liability for the causes of action alleged.

8. On the same day, September 20, 2022, Plaintiff also filed a separate Complaint against CHC in Alameda County Superior Court asserting a single cause of action under the Private Attorney's General Act of 2004, Labor Code Section 2698 et seq., Case No. 22-CV-018209, ("the PAGA Complaint" or "the PAGA Action"). The PAGA Action is based on the same alleged Labor Code violations as the Class Action, all of which Plaintiff denies.
9. On March 7, 2023, the Alameda County Superior Court consolidated the Class Action and the PAGA Action for all purposes under Alameda County Superior Court Case No. 22-CV-018191. The Class Action Complaint and the PAGA Complaint are together referred to herein as "the Operative Complaints."
10. On October 27, 2023, The Parties participated in their first all-day mediation presided over by mediator Michael D. Young. Ultimately the parties were unable to resolve the matter and returned to litigation. On July 16, 2024, the Parties attended their second all day mediation with Michael D. Young which led to this Agreement to settle the Actions.
11. Prior to mediation, Plaintiff obtained, through both formal and informal discovery a sampling for payroll and time documents for the Class members as well as data regarding the number of Pay Periods and Work Weeks at issue in this action. Additionally, Plaintiff obtained contact information for the Class Members through a *Belair-West* privacy mailing. Plaintiff's investigation was sufficient to satisfy the criteria for court approval set forth in *Dunk v. Foot Locker Retail, Inc.* (1996) 48 Cal.App.4th 1794, 1801 and *Kullar v. Foot Locker Retail, Inc.* (2008) 168 Cal.App.4th 116, 129-130 ("*Dunk/Kullar*").
12. Plaintiff has not filed a Motion for Class Certification, and the Court has not granted class certification.
13. The Parties, Class Counsel and Defense Counsel represent that they are not aware of any other pending matter or action asserting claims that will be extinguished or affected by the Settlement.

14. On April 2, 2025, the Court granted preliminary approval of the settlement in this matter, thus deeming it provisionally fair subject to the class administration process.

SETTLEMENT TERMS AND PLAN OF ALLOCATION

15. The Gross Settlement Amount is \$280,000.00 (Agreement ¶1.23). Under the terms of the Settlement, the Gross Settlement Amount consists of the following:

- a. **Individual Class Payments – Net Settlement Amount (*currently estimated to be \$109,676*) (Agreement ¶1.30)**
- b. **Individual PAGA Payments - \$7,000 (Agreement ¶3.2.7)**
- c. **Class Representative Service Payment - \$7,500 (Agreement ¶3.2.1)**
- d. **Class Counsel Fees Payment – \$93,324.00 (Agreement ¶3.2.2)**
- e. **Class Counsel Costs Payment – Not to exceed \$35,000.00¹ (Agreement ¶3.2.2)**
- f. **LWDA PAGA Payment - \$21,000 (Agreement ¶1.22)**
- g. **Administration Expenses Payment – Not to Exceed \$6,500 (Agreement ¶3.2.3)**

16. Defendant shall fully fund the Gross Settlement Amount by transmitting the funds to the Administrator no later than 30 days after the Effective Date. (Agreement at ¶ 4.2) The Effective Date means the date when both the following have occurred: (a) the Court has entered a judgment on its order granting final approval of the Settlement herein, and (b) the judgment is final. The judgment is final as to the latest of the following occurrences: (a) If no Settlement Class Member objects to the Class Settlement, the day the Court enters judgment; or (b) if one or more Settlement Class Members object to the Class Settlement, the day after the deadline for filing a notice of appeal from the judgment or, if a timely appeal from the judgment is filed, the day after the appellate court affirms the judgment and issues a remittitur. (Agreement at ¶ 1.18).

17. Within 14 days after Defendant funds the Gross Settlement Amount, the Administrator will mail checks for all Individual Class Payments, all Individual PAGA payments, the

Administration Expenses Payment, the Class Counsel Fees Payment, the Class Counsel Litigation Expenses Payment, the Class Representative Service Payment The Administrator shall also remit and pay all employer taxes to the applicable taxing authorities on the wage portion of the Settlement and issue all tax-related documents to Class Members and Aggrieved Employees regarding amounts paid to the pursuant to the Settlement. Disbursement of the Class Counsel Fees Payment, the Class Counsel Litigation Expenses Payment and the Class Representative Service Payment shall not precede disbursement of Individual Class Payments. (Agreement at ¶ 4.3).

18. The Net Settlement Amount means the Gross Settlement Amount, less the following payments in the amounts approved by the Court: Class Representative Service Payment, Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, PAGA Employee Amount, LWDA PAGA Payment, the Administration Expenses Payment, and all Employer taxes on the wage portion of the Settlement. The remainder is to be paid to Participating Class Members as Individual Class Payments. (Agreement at ¶ 1.27). Participating Class Members is a Class Member who does not submit a valid and timely Request for Exclusion from the Settlement. (Agreement at ¶ 1.33).

19. The Individual Class Payments will be calculated by (a) dividing the Net Settlement Amount by the total number of Workweeks worked by all Participating Class Members during the Class Period and (b) multiplying the result by each Participating Class Member's Workweeks. (Agreement at ¶ 3.2.4). PAGA Penalties in the amount of twenty-eight thousand (\$28,000) are to be paid from the Gross Settlement Amount, with 75% (\$21,000) allocated to the LWDA PAGA Payment and 25% (\$7,000) allocated to the Individual PAGA Payments. (Agreement at ¶1.30) The Administrator will calculate each Individual PAGA Payment by (a) dividing the amount of the Aggrieved Employees' 25% share of PAGA Penalties (\$7,000) by the total number of PAGA Period Pay Periods worked by all Aggrieved Employees during the PAGA Period and (b) multiplying the result by each Aggrieved Employee's pay periods worked during PAGA Period. (Agreement at ¶ 3.2.5) Workweeks will be based on Defendant's records.

20. In this matter there were no opt-outs, no objections, and no challenges to the number of Class Workweeks and PAGA Pay Periods. This result indicates that this settlement has the overwhelming support of the class as there are no objectors and no one who has requested exclusion. The silence of the class as to these issues supports granting final approval of the settlement.
21. The Administrator will calculate each Individual PAGA Payment by (a) dividing the amount of the Aggrieved Employees' 25% share of PAGA Penalties (\$28,000) by the total number of PAGA Pay Periods worked by all Aggrieved Employees during the PAGA Period and (b) multiplying the result by each Aggrieved Employee's PAGA Pay Periods. (Agreement ¶3.2.3)
22. Because future PAGA claims are subject to claim preclusion upon entry of the Judgment, Non-Participating Class Members who are Aggrieved Employees are deemed to release the claims identified in paragraph 5.3 of the Agreement and are eligible for an Individual PAGA Payment. (Agreement ¶7.4.4) Finally, the Class Notice will advise the Participating Class Members of their right to object to class action components of the Settlement and/or the Agreement, including contesting the fairness of the Settlement, and/or amounts requested for the Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment and/or Representative Service Payments. (Agreement at ¶ 7.7).
23. The Administrator will issue checks for the Individual Class Payments and/or Individual PAGA Payments and send them to the Class Members via First Class U.S. Mail, postage prepaid. (Agreement at ¶ 4.3.1) The face of each check shall prominently state the date (not less than 180 days after the date of mailing) when the check will be voided. The Administrator will cancel all checks not cashed by the void date. (*Id.*) The Administrator will send checks for Individual Settlement Payments to all Participating Class Members (including those for whom Class Notice was returned undelivered). (*Id.*) The Administrator will send checks for Individual PAGA Payments to all Aggrieved Employees including Non-Participating Class Members who qualify as Aggrieved Employees (including those for whom Class Notice was returned undelivered). (*Id.*) The

1 Administrator may send Participating Class Members a single check combining the
2 Individual Class Payment and the Individual PAGA Payment. (*Id.*) The Settlement
3 Administrator must conduct a Class Member Address Search of Address Database.
4 (Agreement ¶4.1.6.) For any Class Member whose Individual Class Payment check or
5 Individual PAGA Payment check is uncashed and cancelled after the void date, the
6 Administrator shall transmit the funds represented by such checks to the Bay Area Legal
7 Aid. (Agreement ¶4.3.3)

8 24. The Parties have jointly selected Phoenix Settlement Administrators., to serve as the
9 Administrator. From the Gross Settlement Amount, the Administrator shall be paid the
10 Administrator Expenses Payment not to exceed \$6,500 except for a showing of good
11 cause and as approved by the Court. (Agreement at ¶ 3.2.3) To the extent the
12 Administration Expenses are less or the Court approves payment less than \$6,500, the
13 Administrator will put the remainder in the Net Settlement Amount. (*Id.*) Phoenix
14 Administrators has completed the class notice mailing and is providing a declaration to
15 assist with the granting of final approval in this matter.

16 25. Subject to Court Approval, the Agreement provides for Class Counsel to be awarded a
17 sum not to exceed one-third (33.3%) of the Gross Settlement Amount, as the Class
18 Counsel Fees Payment. (Agreement at ¶ 3.2.2). Class Counsel will also be allowed to
19 apply separately for an award of Class Counsel Litigation Expenses Payment in an
20 amount not to exceed \$35,000, although the real amount as explained below is \$26,308.03
21 (*Id.*) Subject to Court approval, the Agreement provides for a Class Representative
22 Service Payment in the amount no more than \$7,500 to Plaintiff. (Agreement at ¶ 3.2.1).

23 CLASS CERTIFICATION ISSUES

24 26. Plaintiffs contend that the proposed Settlement meet all of the requirements for class
25 certification under California Code of Civil Procedure § 382 as demonstrated below, and
26 therefore, the Court may appropriately approve the Class as defined in the Agreement.
27 This Court should conditionally certify the Class for settlement purposes only, defined as
28 follows:

“all persons directly employed by Defendants in California and classified as a non-exempt employee who worked during the Class Period.” (Agreement at ¶ 1.5.)

The “Class Period” means the period from September 20, 2018, through the date at which the Court grants Preliminary Approval of the Settlement or through February 28, 2025, whichever occurs first (Agreement at ¶ 1.12).

a. Numerosity – Here, Plaintiffs assert that the 112 current and former employees that comprise the Class can be identified based on Defendant’s records and are sufficiently numerous for class certification. The number of Class Members is verified by the Declaration of Defendant’s counsel, submitted herewith.

b. Common Issues Predominate - Here, Plaintiffs contend that common questions of law and fact are present, and specifically the common questions of whether Defendant’s employees were paid for all time worked, paid the proper rate, whether Defendant provided meal and rest periods, whether the Defendant provided expenses reimbursements, whether the Defendant provided accurate wage statements, whether the Defendant provided all wages when due, and whether the Class Members are entitled to damages and penalties as a result of these practices.

c. Typicality – In the instant case, Plaintiffs contend that there can be little doubt that the typicality requirement is satisfied. The Plaintiffs, like every other member of the Class, worked for Defendant as a non-exempt employee during the Class Period. Plaintiffs contends that, like every other member of the Class, she was subject to the same practices and policies of Defendant and are subject to the same defenses. Thus, Plaintiffs assert that the claims of the Plaintiff and the Class Members arise from the same course of conduct by the Defendant, involve the same employment policies and practices of Defendant, and are based on the same legal theories.

d. Adequacy – Plaintiffs contend that the Class Members are adequately represented here because Plaintiffs and representing counsel (a) do not have any conflicts of interest with other class members, and (b) will prosecute the case vigorously on behalf of the class.

1 This requirement is met here. First, Plaintiffs are well aware of their duties as the
2 representatives and have actively participated in the prosecution of this case to date.
3 Plaintiffs have effectively communicated with counsel, provided documents to counsel
4 and participated in the investigation and negotiations in the Action. The Declaration of
5 Plaintiffs submitted herewith establishes their adequacy and lack of conflicts. Second,
6 Plaintiffs retained competent counsel who are experienced in employment class actions
7 and who have no conflicts. Third, there is no antagonism between the interests of the
8 Plaintiffs and those of the Class. Both the Plaintiffs and the Class Members seek
9 monetary relief under the same set of facts and legal theories.

10 27. Given the facts, this settlement is therefore certainly entitled to preliminary approval.

11 While Plaintiff believes that this case is proper for class treatment, these standards are
12 high and were this case to go to trial, the Plaintiff and the other class members would
13 need to prove, among other things, that wages were owed on a class-wide basis. This was
14 and is a substantial risk.

15 28. The stage of the proceedings at which this Settlement was reached also militates in favor
16 of preliminary approval and ultimately, final approval of the Settlement. Class Counsel
17 has conducted a thorough investigation into the facts of the class action. Class Counsel
18 began investigating the Class Members' claims before the Action was filed. Class
19 Counsel engaged in informal discovery and conducted a review and analysis of the
20 relevant documents and data, including reaching out the class members to gather evidence
21 related to the claims.

22 29. Class Counsel is also experienced with the claims at issue here, as Class Counsel
23 previously litigated and settled similar claims in other actions. Accordingly, the
24 agreement to settle did not occur until Class Counsel possessed sufficient information to
25 make an informed judgment regarding the likelihood of success on the merits and the
26 results that could be obtained through further litigation. Based on the foregoing data and
27 own independent investigation and evaluation, Class Counsel is of the opinion that the
28 Settlement with Defendant for the consideration and on the terms set forth in the

1 Agreement is fair, reasonable, and adequate and is in the best interest of the Class in light
2 of all known facts and circumstances, including the risk of significant delay, defenses
3 asserted by Defendant, and numerous potential appellate issues. There can be no doubt
4 that Counsel for both parties possessed sufficient information to make an informed
5 judgment regarding the likelihood of success on the merits and the results that could be
6 obtained through further litigation.

7 **CLASS COUNSEL'S ADEQUACY OF REPRESENTATION AND ABSENCE OF**
8 **CONFLICT**

9 30. I have been a member, in good standing, of the State of California since 2005. I am
10 admitted to practice in the United States Supreme Court, the United States District Courts
11 for the Central, Southern and Eastern Districts of California, the District of Colorado, the
12 United States Court of Appeals for the Federal Circuit and the United States Court of
13 Appeal for the Ninth Circuit.

14 31. I have handled a little over 1,400 employment litigation matters on behalf of employees
15 and employers during my tenure. I have also handled complex business and class action
16 litigation matters to and thru trial, judgment and post-judgment.

17 32. I devote a significant portion of my practice to employment law and class actions and
18 have been appointed by the court as class counsel and have received final court approval
19 and judgment as a plaintiff's attorney.

20 33. I have extensive litigation experience with all phases of litigation including discovery,
21 along with 92 trials, administrative hearings, arbitrations and appeals. I estimate that over
22 the years litigating with over 4,400 clients on my firm's client list, I have helped class
23 clients obtain and defendant entities avoid judgments/settlement in excess of hundreds of
24 millions of dollars.

25 34. Notably, while often a plaintiff's counsel, one of the cases I defended was a wage and
26 hour employment class action *Rutledge v. Ameriguard* before the San Diego Superior
27 Court where the Plaintiffs sought 4.2 million dollars. In that matter, I stipulated for class
28 certification for the sake of judicial economy and to reduce costs and fees for all parties

1 but obtained a defense verdict after trial for my corporate client and was designated “trial
2 of the month” by San Diego County Bar Association.

3 35. Recently, in 2021, as Plaintiff’s counsel, I successfully certified a class of employees in
4 the matter of Fernandez v. Suburban Propane L.P. Fresno Superior Court Case No
5 16CECG00418 via a motion for class certification and was appointed class counsel as
6 part of that certification. Just this past year, my firm was appointed Class Counsel in
7 Brown v. ESA Management San Joaquin Superior Court Case No. STK-CV-UOE-2019-
8 7162 wherein we obtained a \$3.9 million dollar settlement for the class.

9 36. In sum, there are more than 30 class action cases I have been counsel of record, either as
10 defense or plaintiffs’ counsel. These are in six California counties and district court level
11 matters. (*An index of said cases is attached hereto as Exhibit 1*). I have obtained court
12 approval as class counsel via opposed Motion for Class Certification, Stipulation for
13 Class Certification and Stipulation for Entry of Judgment in many of our class actions.

14 37. I have reviewed my firm’s cases and representation of other plaintiffs and there is no
15 conflict or representation which would prevent my firm from representing the interests
16 of the Class. My firm has never represented Defendant nor any affiliate of the
17 Defendant. My firm’s only interest in the subject matter of this litigation is to ensure a
18 recovery to the Class and to maximize that recovery. Finally, our allegiance to the Class
19 and the claims of the Class is not inconsistent with our allegiance to pursue the claims
20 on behalf of other employees and classes as the claims are all against different and
21 distinct employers. I can think of no conflict that would arise in our representation of
22 the Class and our adequate representation of the Class is evidenced by the successful
23 prosecution of the class claims to reach an excellent recovery for the Class. Thus, the
24 adequacy requirement for my firm is satisfied.

25 **THE CLASS REPRESENTATIVE SERVICE PAYMENT IS REASONABLE**

26 38. Plaintiffs will apply to the Court for a Representative Service Payment in consideration
27 for their service and for the risks undertaken in this lawsuit. Plaintiff Brick performed his
28 duties admirably by working with Class Counsel and providing witness contact

information and documents that aided Class Counsel in obtaining this Settlement. At this stage, the requested service award of \$7,500 is well within the accepted range of awards for purposes of preliminary approval. See e.g. *Mathein v. Pier 1 Imps. (U.S.), Inc.*, 2018 U.S. Dist. LEXIS 71386 (E.D. Cal. 2018) (awarding \$12,500 where average class member payment was \$351); *Holman v. Experian Info. Solutions, Inc.*, 2014 U.S. Dist. LEXIS 173698 (N.D. Cal. 2014) (approving \$10,000 service award where class member recovery was \$375); *Rausch v. Hartford Fin. Servs. Grp.*, 2007 U.S. Dist. LEXIS 14740, 2007 WL 671334 (D. Or. 2007) (approving award of \$10,000 where class member recoveries were as little as \$150); *Louie v. Kaiser Foundation Health Plan, Inc.*, 2008 WL 4473183, *7 (S.D.Cal. Oct. 06, 2008) (awarding \$25,000 service award to each of six plaintiffs in overtime class action); *Glass v. UBS Fin. Servs.*, 2007 WL 221862, *16-17 (N.D.Cal. Jan. 27 2007) (awarding \$25,000 service award in overtime class action and a pool of \$100,000.00 in enhancements). As explained in *Glass*, service awards are routinely awarded to class representatives to compensate the employees for the time and effort expended on the case, for the risk of litigation, for the fear of suing an employer and retaliation there from, and to serve as an incentive to vindicate the statutory rights of all employees. 2007 WL 221862 at 16-17.

39. In the present matter, Alexander Brick the Class Representative participated in discovery and my firm defended him at his deposition. He provided valuable information to us that assisted in obtaining this settlement and was available to assist at mediation if questions arose. It is my opinion that Mr. Brick is certainly entitled to the proposed service award.

CLASS COUNSEL LITIGATION EXPENSES PAYMENTS

40. Webb Law Group, APC has a total of \$4,585.29 in hard costs for this matter. These hard costs are itemized in a true and correct copy “**Exhibit 2**” which contains the billing records for this matter.

41. Blumenthal Nordrehaug Bhowmik De Blouw LLP (*The Blumenthal Firm*) has a total of \$16,859.44 in hard costs for this matter. These costs are described in detail in the Declaration of Kyle Nordrehaug which is being filed concurrently along with this motion.

1 Nevels Nichols LLP has a total of \$4,863.30 in hard costs for this matter. These costs are
2 described in detail in the Declaration of Brooke Nevels which is being filed concurrently
3 along with this motion.

4 42. Therefore, the actual total of costs incurred by my firm, as well as by my co-counsel,
5 the Blumenthal firm and the Nevels Nichols LLP is **\$26,308.03**, thus out of the \$35,000
6 allotted for hard costs and expense reimbursements, we cumulatively seek only
7 **\$26,308.03**, meaning that the remainder will be returned to be distributed among the
8 Class Members.

9 43. The requested costs were reasonably incurred, necessary, and a direct result of
10 the Plaintiffs having to file lawsuits to in order to collect unpaid wages due and owing,
11 and years of extensive litigation, investigation, and discovery, mediations, and other
12 actions which required our firms to advance hard costs, with no guarantee of recovering
13 them. As such, the Court should award Plaintiffs' counsel from in this matter \$4,585.29
14 to the Webb Firm, \$16,859.44 to the Blumenthal Firm and \$4,863.30 to Nevels Nichols
15 LLP respectively, for a total of **\$26,308.03**.

16 **ATTORNEYS FEES**

17 44. While this matter was taken on a contingency, my firm litigates matters on both a
18 contingent and hourly basis, thus we keep diligent billing records on all our matters.
19 Throughout this matter, each and every member of our staff has maintained detailed and
20 accurate billing records which I, along with my associates, and my Billing Coordinator,
21 Keren Alvarado independently review and audit. My firm takes great pride in its billing
22 practices and attention to detail in reviewing its billing. (Attached hereto as "**Exhibit 2**"
23 is a true and correct copy of our billing records for this matter, including all hard costs
24 incurred.)

25 45. Over the years that we have worked on this matter, my firm has invested 132 hours in
26 this case, and I anticipate that with the remaining work needed to be completed in order
27 to finalize approval and monitor the settlement through disbursement, we will incur
28

1 additional hours of work. The 132 hours total \$63,105.90 in work across the various
2 staffers billing rates at my firm.

3 46. My co-counsel describes in detail in the Declaration of Kyle Nordrehaug that the
4 Blumenthal firm has spent a total of 92.7 hours on this matter for a cumulative total of
5 \$74,549.44 in fees incurred. Additionally, co-counsel Nevels Nichols LLP had a total of
6 \$78,725.00 in fees incurred on this matter across 123.4 hours of work. In sum total, our
7 firms incurred \$216,380.34 in fees on this matter. This number far exceeds the \$93,324.00
8 amount allocated for class counsel fees in this case, meaning that instead of obtaining a
9 multiplier for our efforts, Class Counsel will only be receiving back approximately 43%
10 of the time that they put into the case. This amount is well within the appropriate range
11 as multipliers are frequently granted on class action settlements.

12 47. Having agreed represent the Plaintiffs on a contingency basis, my firm has yet to receive
13 any compensation for the large amount of work performed on this case. As I am aware
14 with my own law firm, taking and litigating cases on a contingency basis necessarily
15 forecloses opportunities to take on additional cases where my firm could be paid on an
16 hourly basis. In order to make this economically viable, when appropriate we must be
17 compensated with a multiplier, otherwise it makes no financial sense for us to take on
18 contingent matters when we could instead have the guarantee of hourly pay.

19 48. This is especially true in the current market, where overhead has increased drastically
20 over the last few years while this case has been pending. We have been working on this
21 matter since 2023 and as the Court is no doubt aware, there has been a great deal of
22 inflation over the past few years.

23 49. There are many alternatives where the class representatives would not prevail. In
24 *Ketchum*, the court warned that fee awards should be “fully compensatory”. (*Ketchum*,
25 24 Cal.4th at 1133). Should every defendant, similar to California Hydronics attempt to
26 try individual plaintiffs in lawsuits, law firms would be quickly put out of business,
27 without the incentive of a multiplier in the event of a settlement. To the contrary, defense
28 firms get paid, regardless of whether they win or lose.

1 50. As Class Counsel, we extensively addressed the perceived risks in this case in the filed
2 Notice of Motion and Motion for Preliminary Approval. In addition to the complexity of
3 this case, Class Counsel has borne the entire risk and costs of the litigation during the
4 entire time that it has been pending, all on a pure contingency basis, and at a 0.0% interest
5 rate, at a time when rampant inflation is rising faster than it has in decades. Through the
6 investment of substantial efforts and resources, Class Counsel has secured a solid
7 Settlement on behalf of the Settlement Class Members. The settlement value necessitates
8 compensation of Class Counsel at the agreed upon percentage as the amount allocated for
9 Class Counsel's fees is well below the lodestar in this case.

10
11 I declare under penalty of perjury under the laws of the State of California that the foregoing
12 is true and correct. Executed on August 4, 2025, in San Diego California.

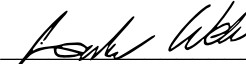
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14 By: 
15 Lenden F. Webb
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EXHIBIT 1

CLASS ACTIONS CASES

Class Counsel

1. *Johnson v. KTS Transportation*, San Diego County 37-2016-00013606-CU-OE-CTL
2. *Ruben Bustoz & Vince Velarde v. Belmont Park Entertainment*, San Diego County, 37-2016-00013961-CU-OE-CTL
3. *Michael Clark v MS Fire Protection, Inc.*, Fresno County, 18CECG02823
4. *Gerry Craft, et. al. v. Green Shield Security*, San Diego County, 37-2016-00018493-CU-OE-CTL
5. *Alma Ramos v. SmileCare*, Fresno County Court, 13CECG00517
6. *Matthew Conners v. Mission Valley Kilt, LLC*, San Diego Court 37-2015-00036888-CU-OE-CTL
7. *Fernando Cuenca v. East Village Kilt, L.P*, San Diego Court, 37-2016-00009130-CU-OE-CTL
8. *Laramie Lawrenz v. BlackTalon Enterprises, Inc.*, County of Sonoma, SCV-258205
9. *Erick Gomez v. Tough Turtle*, San Diego County, 37-2016-00026760-CU-OE-CTL
10. *Michelle Fernandez v. Suburban Propane, L.P.*, Fresno County, 16CECG00418
11. *Layla Peckler v. Macys West Stores, Inc*, Fresno County 17CECG02571
12. *Felix Guevara v. Royal Security*, Fresno County, 19CECG00216
13. *Jeremy Vannest v. Direct Dairy Transport, LLC.*, Merced County, 18CV-03599
14. *Samantha Howell v. Correa Management, Inc.; Sombrero Mexican Food; Sombrero Sports Arena*; San Diego County, 37-2015-00037098-CU-OE-CTL
15. *Holly Rodems v. Chico's Fas, Inc.*, Fresno County, 16CECG01909
16. *Kerkorian v. Samsung*, Eastern District Fresno County, 1:18-cv-00870-DAD-SKO
17. *Layla Peckler v. Ulta Cosmetics*, Eastern District Fresno County 1:17-cv-01206-BAM
18. *Deborah Santos vs Three Palms Mobile Home & RV Park*, Fresno County, 15CECG03927
19. *Joshua Richmond vs ING Bank, FSB dba ING Direct*, San Diego County 37-2013-00038893-CU-BT-CTL
20. *Richard Vogel v Price-Simms, Inc*, Santa Clara County 114CV261268
21. *Joaquin Taylor v. Regents of the University of California*, Merced County 18CV-02499
22. *Roslene Curtis v. 424 Market, et. al*, San Diego County 37-2018-00028526-CU-PO-CTL
23. *Bri Seltzer v. Forever 21*, Fresno County 12CECG00483
24. *John Pickens v. Alorica, Inc.*, Eastern District 15-cv-00622
25. *William Sullivan v. Lyon* (Orange County) 30-2013- -00649432-CU-BT-CXC
26. *Castillo v. A.J. Kirkwood & Associates, Inc.*, (LA) Case No. 19STCV04435
27. *Martinez v. Faria No. 1 Limited Partners*, Tulare County Case No. VCU281473
28. *Chi v. Community Reginal Anesthesia Medical Group, et al.*, Fresno County Case No. 20CECG00029
29. *Lopez v. Hy-Lang Electric California, Inc.*, San Diego County Case No. 37-2020-00012543

30. *Shirley Brown v. ESA Management, LLC.*, San Joaquin County Case No. STK-CV-UOE-2019-7162
31. *Marlene Zweig vs. Semper Solaris Construction Inc.*, San Diego County Case No. 37-2022-00005981-CU-BT-CTL
32. *Baker vs. Advanced Disability Management, Inc.*, Sacramento County Case No. 34-2014-00160711

Class Action Defense Counsel

1. *Jennifer Pelayo v. Lucky Chinese Food*, San Diego County – Central, 37-2016-00016342-CU-OE-CTL.
2. *Rutledge v. Ameriguard San Diego County*, 37-2010-0008612-CU-OE-CTL
3. *Garry A. Bailey, et al v Charles Everette Rose, et al*, San Diego County, 37-2016-00023337-CU-EN-CTL
4. *Ebony Ayers v. Carr Bazaar*, Fresno County 06CECG03279

EXHIBIT 2

User	Date	Description	Hours	Rate	Billable	Discounted
Alyssa Soto	11/29/23	Draft of calendar entry for scheduled call between opposing counsel and Attorney CEN. Memo to file regarding same.	0.1	160		16
Alyssa Soto	1/12/24	(PCD 0.2) Office conference between Office Assistant ALY and Paralegal SBC regarding correspondence with Client for status of verified Discovery responses.	0.2	160		32
Andrea Blanco	12/13/23	(PCD 0.1) Office conference between Paralegal SBC and Office Assistant ACB in regard to action for Office Assistant ACB to draft discovery shell.	0.1	160		16
Andrea Blanco	12/13/23	Draft discovery shell in regard to Mr. Brick's responses to Cal Hydronics' requests for production of documents.	0.9	160	\$144.00	
Andrea Blanco	12/29/23	Draft calendar entry in regard to client meeting with Attorney CEN. Create zoom regarding the same.	0.1	160		16
Andrea Blanco	12/29/23	Draft of email correspondence to client in regard to zoom confirmation of meeting with Attorney CEN.	0.1	160	\$16.00	
Andrea Blanco	12/29/23	Research flight options for attorney attendance at Deposition of Mr. Brick.	0.1	160	\$16.00	
Andrea Blanco	1/2/24	Office conference between Attorney LFW and Office Assistant ACB in regard to travel itineraries regarding attendance at Mr. Brick's deposition in Walnut Creek.	0.1	160		16
Andrea Blanco	1/5/24	Draft calendar entry in regard to client meeting with Attorney CEN.	0.1	160		16
Andrea Blanco	1/5/24	Draft of email correspondence to client in regard to confirmation of meeting with Attorney CEN.	0.1	160	\$16.00	
Andrea Blanco	1/9/24	Book flights in regard to attorney attendance at the deposition of Alex Brick.	0.4	160	\$64.00	
Andrea Blanco	1/9/24	Draft of email correspondence to in regard to Attorney CEN's travel itinerary regarding the deposition of Alex Brick.	0.2	160		32
Andrea Blanco	1/9/24	Office conference between Attorney CEN and Office Assistant ACB in regard to travel itinerary for attendance at the deposition of Alex Brick.	0.1	160	\$16.00	
Andrea Blanco	1/10/24	(PCD 0.2) Office conference between Paralegal SBC and Office Assistant ACB in regard to Attorney CEN's travel arrangements to attend Alex Brick's deposition.	0.2	160		32
Andrea Blanco	1/15/24	Telephone conference between Mr. Brick and Office Assistant ACB in regard to reminder to sign discovery responses via docusign.	0.1	160	\$16.00	
Andrea Blanco	1/29/24	(PCD 0.1) Office conference between Paralegal SBC and Office Assistant ACB regarding request for remote appearance links for Case Management Conference in Alameda County.	0.1	160		16
Andrea Blanco	2/1/24	Draft calendar entry regarding Attorney CEN's call with opposing counsel.	0.1	200	\$20.00	
Andrea Blanco	2/5/24	Update calendar entry in regard to Attorney CEN's call with opposing counsel.	0.1	200		20
Andrea Blanco	2/26/24	Draft calendar entry in regard to Attorney CEN's call with opposing counsel.	0.1	200		20
Axel Chilaca	4/1/24	(PCD 1.0) Reading through case documents in preparation for Potential Witness calls.	1	240		240
Brooke Nevels	11/1/23	Review the Mediation Brief for CalHydronics.	0.3	760	\$228.00	
Brooke Nevels	11/8/23	Receipt and review email exchanges with Attorney CEN and Opposing Counsel regarding status of the case, deadlines, discovery and motions to compel.	0.2	760	\$152.00	
Brooke Nevels	11/8/23	Receipt and review of the Notice of Association of Counsel	0.1	760	\$76.00	
Brooke Nevels	11/13/23	Receipt and review of email exchanges with Co-Counsel regarding action plan moving forward and service of pleadings and documents.	0.2	760	\$152.00	
Brooke Nevels	11/13/23	Receipt and review of the tentative ruling on the Case Management conference.	0.1	760	\$76.00	
Brooke Nevels	11/17/23	Receipt of the filed Notice of Association of Counsel.	0.1	760	\$76.00	
Brooke Nevels	11/28/23	Receipt and review of email exchanges from Opposing Counsel regarding availability to meet and confer regarding deposition dates and discovery responses.	0.2	760	\$152.00	
Brooke Nevels	11/29/23	Telephone conference with Client, Attorney CEN and Attorney BBN regarding the deposition noticed by Defendant.	0.2	760	\$152.00	
Brooke Nevels	11/30/23	Office conference between Attorney CEN and Attorney BBN regarding outcome of meet and confer, deposition dates, and supplementation. Discussion of new deadlines.	0.2	760	\$152.00	
Brooke Nevels	12/12/23	Receipt and review of email exchanges between Client and Attorney CEN regarding deposition locale.	0.2	760	\$152.00	
Brooke Nevels	12/13/23	Receipt and brief review of CALIFORNIA HYDRONICS Request for Production of Documents to BRICK - Set One (1).	0.2	760	\$152.00	
Brooke Nevels	12/19/23	Review edits to the Belaire-West Notice.	0.2	760	\$152.00	
Brooke Nevels	12/20/23	Receipt of email correspondence from Opposing Counsel regarding agreement to split costs for the Belaire West notice.	0.1	760	\$76.00	
Brooke Nevels	1/2/24	Receipt of email correspondence from Simpluris regarding introduction and future timeline for mailing.	0.1	760	\$76.00	
Brooke Nevels	1/3/24	Office conference between Attorney CEN and Attorney BBN about the discovery responses and referencing all documents because we are unsure which were produced by them originally or if by our client.	0.2	760	\$152.00	
Brooke Nevels	1/4/24	Office conference between Attorney CEN and Attorney BBN regarding Client's email about meeting, scheduling a time to discuss discovery.	0.1	760	\$76.00	
Brooke Nevels	1/9/24	Office conference between Attorney CEN and Attorney BBN about main issues in California Hydronics matter including overtime rate being wrong as it is not based on the "regular" rate and rounding issues. Discussion of unique behavioral issue that our client was accused of.	0.3	760	\$228.00	
Brooke Nevels	1/10/24	Receipt and review of Defendant's supplemental responses.	0.3	760	\$228.00	
Brooke Nevels	1/11/24	Office conference between Attorney CEN and Attorney BBN about revisions to our client's discovery responses. Discussion about code compliant discovery responses when client does not have documents.	0.2	760	\$152.00	
Brooke Nevels	1/11/24	Office conference between Attorney CEN and Attorney BBN regarding supplemental discovery responses, timeline on motion to compel, and email to be sent to Opposing Counsel! Sarah about the extension requested.	0.2	760	\$152.00	
Brooke Nevels	1/11/24	Receipt and review of email correspondence with Opposing Counsel regarding supplemental responses and extension on discovery. Memo to file.	0.2	760	\$152.00	
Brooke Nevels	1/16/24	Receipt and review of CHC Supplemental Response to Plaintiff's Special Interrogatories, Set One; 2 CHC Supplemental Response to Plaintiff's Form Interrogatories - Employment, Set One, No. 217.1; 3 CHC Supplemental Response to Plaintiff's Request for Admission, Set One, Nos. 8, 12 and 13; 4 CHC Supplemental Response to Plaintiff's Request for Production, Set One.	0.2	760	\$152.00	
Brooke Nevels	1/16/24	Receipt and review of Defendant's Amended Supplemental Response to Plaintiff's Form Interrogatories, No. 217.1.	0.2	760	\$152.00	
Brooke Nevels	1/16/24	Receipt of email correspondence from Opposing Counsel regarding confirmation that employee contact information has been loaded. Memo to file.	0.1	760	\$76.00	
Brooke Nevels	1/16/24	Receipt of email correspondence from Simpluris regarding Belaire West mailing timeline.	0.2	760	\$152.00	
Brooke Nevels	1/16/24	Receipt of email exchanges with Opposing Counsel and Attorney CEN regarding deposition start time. Memo to file.	0.2	760	\$152.00	
Brooke Nevels	1/16/24	Receipt of email exchanges with Opposing Counsel and Class Administrator regarding edits to the Belaire West Opt-Out mailing.	0.2	760	\$152.00	
Brooke Nevels	1/16/24	Receipt of reminder that discovery responses are due. Memo to Attorney CEN regarding the same.	0.1	760	\$76.00	
Brooke Nevels	1/17/24	Receipt and review of: ALEXANDER BRICK'S RESPONSES TO CALIFORNIA HYDRONICS CORPORATION'S REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE (1).	0.2	760	\$152.00	
Brooke Nevels	1/17/24	Receipt of email correspondence regarding revised mailing for the Belaire West notice.	0.1	760	\$76.00	
Brooke Nevels	1/19/24	Receipt of email correspondence from Simpluris regarding confirmation of mailing.	0.1	760	\$76.00	
Brooke Nevels	1/23/24	Office conference between Attorney CEN and Attorney BBN regarding CMC Statement and the plan for upcoming CMC including scheduling preferences as it relates to motion for class certification.	0.2	760	\$152.00	
Brooke Nevels	1/26/24	Office conference between Attorney LFW, Attorney CEN and Attorney BBN regarding belaire-west, additional discovery, upcoming CMC and action plan.	0.2	760	\$152.00	
Brooke Nevels	1/30/24	Office conference between Attorney CEN and Attorney BBN regarding outcome of Case Management Conference and next steps. Memo to file regarding same.	0.2	760	\$152.00	
Brooke Nevels	1/30/24	Office conference with Attorney CEN and Attorney BBN regarding the sampling of wage statements and Defendants argument that it is burdensome to produce them.	0.2	760	\$152.00	
Brooke Nevels	1/30/24	Receipt and review of the Case Management Conference Order. Office conference with Attorney CEN regarding the same.	0.2	760	\$152.00	
Brooke Nevels	2/1/24	Receipt and review of email exchanges with Opposing Counsel and CEN regarding scheduling to meet and confer regarding production of documents. Memo to file.	0.2	760	\$152.00	
Brooke Nevels	2/2/24	Receipt and review of the weekly report ending 2/2/24 on the class mailing.	0.1	760	\$76.00	
Brooke Nevels	2/2/24	Receipt and review of: Amended Response to Plaintiff's Request for Admission, Set One, No. 9	0.2	760	\$152.00	
Brooke Nevels	2/5/24	Second Amended Supplemental Response to Plaintiff's Form Interrogatories, Set One, No. 217.1.	0.2	760	\$152.00	
Brooke Nevels	2/5/24	Office conference between Attorney CEN and Attorney BBN regarding deposition and clients resistance to being deposed.	0.1	760	\$76.00	
Brooke Nevels	2/5/24	Receipt and review of email exchanges with Client and LFW regarding the upcoming deposition. Memo to file.	0.2	760	\$152.00	
Brooke Nevels	2/6/24	Office conference between Attorney CEN and Attorney BBN about sampling protocols and wanting 1 month per quarter for sampling. Discussion about need for paystubs and sampling.	0.2	760	\$152.00	

Brooke Nevels	2/7/24	Office conference with CEN and Attorney BBN regarding upcoming deposition, mediation, and expert retention for damage analysis. Draft of email to experts regarding availability. Memo to file.	0.3	760	\$228.00	
Brooke Nevels	2/13/24	Receipt and review of email correspondence from Opposing Counsel regarding wage statement sampling and mediation. Memo to file.	0.2	760	\$152.00	
Brooke Nevels	2/13/24	Receipt and review of mailing weekly report ending 2/9/24.	0.1	760	\$76.00	
Brooke Nevels	2/14/24	Office conference between Attorney CEN and Attorney BBN regarding the sampling, timeline for same, response to Opposing Counsel Sarah and follow up.	0.2	760	\$152.00	
Brooke Nevels	2/16/24	Office conference between Attorney CEN and Attorney BBN regarding opt-outs and comments from Client Brick about former vs current employees and willingness to testify.	0.1	760	\$76.00	
Brooke Nevels	2/20/24	Receipt and review of email exchanges with Client regarding review of the deposition transcript and next steps moving forward. Memo to file.	0.2	760	\$152.00	
Brooke Nevels	2/22/24	Receipt and review of email exchanges with Opposing Counsel and Attorney CEN regarding mediation and sampling.	0.2	760		152
Brooke Nevels	2/26/24	Office conference between Attorney CEN and Attorney BBN regarding mediation, sampling, call with Opposing Counsel Sarah.	0.1	760	\$76.00	
Brooke Nevels	2/29/24	Office conference between Attorney CEN and Attorney BBN about timeline for production of the sampling. Memo to file regarding same.	0.2	760	\$152.00	
Brooke Nevels	2/29/24	Receipt of the names, addresses and phone numbers of the mail-out. Memo to Attorney LFW and Attorney CEN regarding action plan moving forward.	0.2	760	\$152.00	
Brooke Nevels	3/1/24	Email exchanges with Attorney CEN and Attorney LFW regarding the belaire west mailing and action moving forward with witness declarations. Memo to file.	0.2	760	\$152.00	
Brooke Nevels	3/6/24	Receipt and review of Simpluris Final Report - 2024 02 Feb 28.	0.1	760	\$76.00	
Brooke Nevels	3/7/24	Receipt and review of email correspondence from Opposing Counsel regarding status of production of wage statements.	0.1	760	\$76.00	
Brooke Nevels	3/7/24	Receipt of invoice form simpluris. Memo to CEN regarding the same.	0.1	760	\$76.00	
Brooke Nevels	3/27/24	Office conference between Attorney CEN and Attorney LFW and Attorney BBN about mediation, location, and plan for moving case forward. Discussion about next steps.	0.2	760	\$152.00	
Casey McGee	11/9/23	(PCD 0.2) Office conference between Legal Assistant CLM and Paralegal LLE in regard to remote appearance for Alameda County.	0.2	200		40
Casey McGee	11/29/23	Office conference between Legal Assistant CLM and Paralegal LLE in regard to client files and case transfer. Action for Legal Assistant CLM to handle for the same.	0.2	200	\$40.00	
Casey McGee	11/30/23	(PCD 0.2) Telephone conference between Paralegal LLE and Case Manager CLM regarding expectation for saving of the client transfer documents.	0.2	200		40
Casey McGee	12/18/23	(PCD 2.0) Organize documents received from file transfer.	2	200		400
Casey McGee	12/19/23	(PCD 0.2) Telephone conference between Paralegal SBC and Case Manager CLM regarding organization and bates numbering of client documents.	0.2	200		40
Casey McGee	12/19/23	(PCD 1.5) Organization of Client Docs & Opposing Docs; Office conference between Paralegal SBC and Case Manager CLM regarding preference for naming documents; Case Manager CLM reviewed documents in bulk to confirmed saved correctly.	1.5	200		300
Christopher Nichol	11/7/23	Draft internal memorandum regarding case and initial steps. Determine Notice of association needs to be drafted.	0.1	760	\$76.00	
Christopher Nichol	11/7/23	Receipt and review of correspondence from Co-Counsel Charlotte about case transfer and motion to compel deadline. Determine we will need a motion to compel extension. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	11/7/23	Receipt and review of objections to PMK deposition and Defendant's responses to discovery.	0.2	760	\$152.00	
Christopher Nichol	11/8/23	Brief exchange of correspondence with Co-Counsel Charlotte about case preferences, service list, and transition into matter.	0.2	760	\$152.00	
Christopher Nichol	11/8/23	Receipt and review of file transfer link, initial documents.	0.2	760	\$152.00	
Christopher Nichol	11/8/23	Receipt of Signed Notice of Association of Counsel.	0.1	760	\$76.00	
Christopher Nichol	11/8/23	Review of Notice of Association of Counsel and approval of same. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	11/9/23	Draft correspondence to Opposing Counsel to introduce myself and tell them to direct communications to our firm. Discussion of CMC and discovery issues to be handled moving forward.	0.2	760	\$152.00	
Christopher Nichol	11/9/23	Office conference between Attorney CEN and Paralegal LLE in regard to upcoming deadlines. Action for Paralegal LLE to calendar for the same.	0.1	760	\$76.00	
Christopher Nichol	11/13/23	Brief exchange of correspondence with Co-Counsel Victoria about Case Management Conference tentative and continuance.	0.2	760	\$152.00	
Christopher Nichol	11/13/23	Receipt and review of Tentative Ruling in California Hydroneics moving case management conference to January. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	11/28/23	Brief exchange of correspondence with Opposing Counsel Sarah about meeting and conferring and process for same. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	11/28/23	Draft correspondence to Opposing Counsel Sarah regarding meeting and conferring about deposition dates for Plaintiff's deposition and also discovery.	0.2	760	\$152.00	
Christopher Nichol	11/28/23	Receipt and review of email serving and deposition notice for Plaintiff's deposition.	0.2	760	\$152.00	
Christopher Nichol	11/29/23	Draft email correspondence to deliver meet and confer letter to Opposing Counsel Lucas and to discuss telephone call tomorrow.	0.1	760	\$76.00	
Christopher Nichol	11/29/23	Draft meet and confer letter to Opposing Counsel Sarah Lucas regarding discovery set one (1).	1.4	760	\$1,064.00	
Christopher Nichol	11/29/23	Telephone conference with Client, Attorney CEN and Attorney BBN regarding the deposition noticed by Defendant.	0.2	760	\$152.00	
Christopher Nichol	11/30/23	Draft correspondence to Opposing Counsel Sarah regarding meet and confer, new dates and deadlines and sampling Parameters for remaining issue.	0.3	760	\$228.00	
Christopher Nichol	11/30/23	Office conference between Attorney CEN, Paralegal LLE and Paralegal SBC regarding file transfer and status of saving all case documents.	0.2	760	\$152.00	
Christopher Nichol	11/30/23	Office conference between Attorney CEN and Attorney BBN regarding outcome of meet and confer, deposition dates, and supplementation. Discussion of new deadlines.	0.2	760	\$152.00	
Christopher Nichol	11/30/23	Receipt and review of amended Notice of Deposition for Alex Brick. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	11/30/23	Receipt and review of correspondence from Opposing Counsel Sarah about deposition date selection on Feb 8, 2024.	0.1	760	\$76.00	
Christopher Nichol	11/30/23	Telephone conference with Opposing Counsel Sarah in order to meet and confer about Defendant's discovery responses and supplementation, Belaire-West, and Plaintiff's deposition. Memo to file regarding same.	0.6	760	\$456.00	
Christopher Nichol	12/1/23	Receipt and review of correspondence from Opposing Counsel Sarah regarding the extended discovery dates.	0.1	760	\$76.00	
Christopher Nichol	12/11/23	Office conference between Attorney CEN and Paralegal SBC regarding draft of Deposition preparation letter.	0.1	760	\$76.00	
Christopher Nichol	12/11/23	Review of deposition preparation correspondence to Client Brick. Review of email sending same. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	12/12/23	Draft correspondence to Client Brick explaining that the other side effectively made it a choice between Walnut Creek or Oakland so we chose the closer location and explaining the law behind this.	0.2	760	\$152.00	
Christopher Nichol	12/12/23	Receipt and brief review of Requests for Production from Defendants to Plaintiff. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	12/12/23	Receipt and review of correspondence from Client Brick about deposition location.	0.1	760	\$76.00	
Christopher Nichol	12/18/23	Draft correspondence to Opposing Counsel Sarah to meet and confer about the sampling and Belaire process.	0.2	760	\$152.00	
Christopher Nichol	12/18/23	Draft memorandum to file regarding travel to deposition for Client. Discussion regarding preparations for Client's deposition.	0.2	760	\$152.00	
Christopher Nichol	12/18/23	Office conference between Attorney CEN and Paralegal SBC regarding objections to Requests for Production of Documents.	0.1	760	\$76.00	
Christopher Nichol	12/18/23	Receipt and review of correspondence from Co-Counsel Charlotte regarding discovery. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	12/18/23	Receipt and review of correspondence from Opposing Counsel Sarah with update on Belaire Process.	0.1	760	\$76.00	
Christopher Nichol	12/19/23	Draft correspondence to Opposing Counsel Sarah regarding the acceptance of Belaire-West revisions and indicating that we can get quotes if they'd like to split costs.	0.2	760	\$152.00	
Christopher Nichol	12/19/23	Receipt and review of email containing Belaire West notice and review of redlines.	0.2	760	\$152.00	
Christopher Nichol	12/19/23	Review of Belaire-West revisions to determine that they are mostly agreeable. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	12/20/23	Draft correspondence to Jodey at Simpluris to get Belaire-West privacy mailing quote.	0.1	760	\$76.00	
Christopher Nichol	12/20/23	Draft correspondence to Patrick at Simpluris to get Belaire-West privacy mailing quote.	0.1	760	\$76.00	
Christopher Nichol	12/20/23	Draft correspondence to Ryan at CPT group to get Belaire-West privacy mailing quote.	0.1	760	\$76.00	
Christopher Nichol	12/20/23	Office conference between Attorney CEN and Paralegal SBC regarding discovery responses and request for documentation from Client.	0.1	760	\$76.00	
Christopher Nichol	12/20/23	Receipt and review of correspondence about Belaire-West quote.	0.1	760	\$76.00	
Christopher Nichol	12/20/23	Receipt and review of multiple email correspondences from Opposing Counsel Sarah about splitting costs and approving postcard for mailing.	0.2	760	\$152.00	
Christopher Nichol	12/20/23	Receipt of quote from Phoenix admin on Belaire-West notice	0.1	760	\$76.00	
Christopher Nichol	12/21/23	Draft correspondence to Opposing Counsel Sarah explaining that we have 2 quotes back, attaching for her review and agreeing on them having input for the postcard.	0.2	760	\$152.00	
Christopher Nichol	12/21/23	Receipt and review of correspondence from Opposing Counsel Sarah about the selection of Simpluris. Memo to file regarding same.	0.1	760	\$76.00	

Christopher Nichol	12/21/23	Review of correspondences between Client Brick and Paralegal SBC. Memo to file regarding same.	0.1	760	\$76.00	
Christopher Nichol	12/22/23	Draft correspondence to Client Alex regarding reasoning behind having his deposition taken, explanation of what it will entail, and then requesting meeting to discuss further.	0.2	760	\$152.00	
Christopher Nichol	12/22/23	Receipt and review of correspondence from Client Brick expressing concern about having to do a deposition and feeling like he shouldn't have to.	0.1	760	\$76.00	
Christopher Nichol	12/28/23	Receipt and review of correspondence from Client Brick regarding scheduling Zoom to meet about deposition.	0.1	760	\$76.00	
Christopher Nichol	12/29/23	Draft correspondence to Client Alex about Zoom meeting to discuss deposition. Memo to file regarding same.	0.1	760	\$76.00	
Christopher Nichol	12/29/23	Draft correspondence to Opposing Counsel Sarah explaining we're fine with Simpluris but we want to get this moving if they're saying the list can't come in until January 13th.	0.1	760	\$76.00	
Christopher Nichol	12/29/23	Draft correspondence to Simpluris to begin belaire-West mailing process and select them as administrator	0.1	760	\$76.00	
Christopher Nichol	12/29/23	Receipt and review of correspondence from Simpluris about administration of Belaire-West mailing.	0.1	760	\$76.00	
Christopher Nichol	1/2/24	Draft correspondence to Simpluris admin regarding providing the Belaire-West notice and conducting the mailing and generating timeline.	0.2	760	\$152.00	
Christopher Nichol	1/2/24	Receipt and review of correspondence from Admin about what they need to start Belaire-West mailing.	0.1	760	\$76.00	
Christopher Nichol	1/3/24	Office conference between Attorney CEN and Attorney BBN about the discovery responses and referencing all documents because we are unsure which were produced by them originally or if by our client.	0.2	760	\$152.00	
Christopher Nichol	1/3/24	Office conference between Attorney CEN and Paralegal SBC regarding documents to include in responses to Request for Production of Documents.	0.1	760	\$76.00	
Christopher Nichol	1/3/24	Receipt of status update on discovery objections and responses. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	1/4/24	Anticipated client meeting between Attorney CEN, Senior Law Clerk JAM, Paralegal SBC to discuss deposition preparation and documents related to discovery.	0.2	760	\$152.00	
Christopher Nichol	1/4/24	Draft correspondence to Client Brick about meeting to discuss his deposition and discovery. Follow up email to ask him for new times to discuss.	0.2	760	\$152.00	
Christopher Nichol	1/4/24	Office conference between Attorney CEN and Attorney BBN regarding Client's email about meeting, scheduling a time to discuss discovery.	0.1	760	\$76.00	
Christopher Nichol	1/4/24	Office conference between Attorney CEN and Paralegal SBC regarding responses to Request for Production of Documents and available production.	0.1	760	\$76.00	
Christopher Nichol	1/4/24	Receipt and review of correspondence from Client about meeting over Zoom this week to discuss case.	0.1	760	\$76.00	
Christopher Nichol	1/5/24	Brief exchange of correspondence with Client Brick about the meeting to discuss deposition.	0.1	760	\$76.00	
Christopher Nichol	1/5/24	Office conference between Attorney CEN, Senior Law Clerk JAM, and Paralegal SBC class certification, computation of damages, and case strategy.	0.3	760	\$228.00	
Christopher Nichol	1/6/24	Receipt and review of correspondence from Client confirming receipt of email and Zoom information.	0.1	760	\$76.00	
Christopher Nichol	1/9/24	Brief review of client documents link and discovery responses draft.	0.2	760	\$152.00	
Christopher Nichol	1/9/24	Draft correspondence to Opposing Counsel Sarah regarding the Amended Notice of Deposition and start time. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	1/9/24	Meeting between Attorney CEN, Senior Law Clerk JAM, Paralegal SBC and Mr. Brick regarding upcoming deposition preparation, discovery inquiries, document production, and assessment of claims.	1	760	\$760.00	
Christopher Nichol	1/9/24	Office conference between Attorney CEN and Attorney LFW and Attorney BBN about main issues in California Hydrionics matter including overtime rate being wrong as it is not based on the "regular" rate and rounding issues. Discussion of unique behavioral issue that our client was accused of.	0.3	760	\$228.00	
Christopher Nichol	1/9/24	Office conference between Attorney CEN, Senior Law Clerk JAM, and Paralegal SBC regarding requirements for class certification, Belaire notices, and case law pertaining to rounding employee time entries.	0.5	760	\$380.00	
Christopher Nichol	1/9/24	Review of logistical information for preparing for deposition. Review travel information for deposition.	0.2	760	\$152.00	
Christopher Nichol	1/10/24	Receipt and review of rest period waiver form and Brick's time records as part of the supplemental production.	0.2	760	\$152.00	
Christopher Nichol	1/10/24	Review of additional documents in relation to discovery response drafts.	0.1	760	\$76.00	
Christopher Nichol	1/11/24	(PCD 0.2) Brief Exchange of correspondence with Co-Counsel Charlotte regarding file transfer and excel spreadsheet of time entries. Subsequent internal emails regarding the files received in discovery.	0.4	760	\$152.00	152
Christopher Nichol	1/11/24	Draft correspondence to Co-Counsel Charlotte regarding PMK deposition notices and document production for time records.	0.2	760	\$152.00	
Christopher Nichol	1/11/24	Draft correspondence to Opposing Counsel Sarah explaining the last issue is the Belaire-West and we would like an extension until the end of February.	0.2	760	\$152.00	
Christopher Nichol	1/11/24	Draft correspondence to Opposing Counsel Sarah regarding clarification on document production post-Belaire-West.	0.2	760	\$152.00	
Christopher Nichol	1/11/24	Office conference between Attorney CEN and Attorney BBN about revisions to our client's discovery responses. Discussion about code compliant discovery responses when client does not have documents.	0.2	760	\$152.00	
Christopher Nichol	1/11/24	Office conference between Attorney CEN and Attorney BBN regarding supplemental discovery responses, timeline on motion to compel, and email to be sent to Opposing Counsel Sarah about the extension requested.	0.2	760	\$152.00	
Christopher Nichol	1/11/24	Receipt of response from Opposing Counsel Sarah limiting the scope of the Motion to Compel extension.	0.1	760	\$76.00	
Christopher Nichol	1/11/24	Review and revise the Responses to Request for Production of Documents.	0.8	760	\$608.00	
Christopher Nichol	1/11/24	Review of correspondence to Client Brick regarding discovery verification	0.1	760	\$76.00	
Christopher Nichol	1/11/24	Review of supplemental discovery responses, including Requests for Admissions, Special Interrogatories, and Form Interrogatories. Detailed memo to file regarding same.	0.6	760	\$456.00	
Christopher Nichol	1/12/24	Draft correspondence to opposing Counsel Sarah explaining that the RFPD #4 response needs to give us additional records related to pay.	0.2	760	\$152.00	
Christopher Nichol	1/12/24	Draft correspondence to Opposing Counsel Sarah explaining that there are 9182 pay periods and we got 27 paystubs so there is nowhere near an adequate sampling.	0.2	760	\$152.00	
Christopher Nichol	1/12/24	Receipt and review of correspondence from Opposing Counsel about how she will agree to a sampling, but they won't agree to produce all wage statements.	0.2	760	\$152.00	
Christopher Nichol	1/12/24	Receipt and review of correspondence from Opposing Counsel Sarah asking for clarification on which documents I am referring to.	0.1	760	\$76.00	
Christopher Nichol	1/12/24	Receipt and review of follow up email from opposing counsel discussing how she believes we don't need the wage statements from all employees. Discussion about a further sampling.	0.1	760	\$76.00	
Christopher Nichol	1/16/24	Brief exchange of correspondence with Opposing Counsel Sarah about deposition timing and logistics. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	1/16/24	Draft follow up correspondence to Opposing Counsel Sarah about the deposition and start time.	0.1	760	\$76.00	
Christopher Nichol	1/16/24	Draft of correspondence to admin Evelyn concurring with Opposing Counsel Sarah's points.	0.1	760	\$76.00	
Christopher Nichol	1/16/24	Receipt and review of CHC Amended Responses to Plaintiff's Form Interrogatories.	0.2	760	\$152.00	
Christopher Nichol	1/16/24	Receipt and review of correspondence from Admin at Simpluris about what they need in advance of the mailing.	0.2	760	\$152.00	
Christopher Nichol	1/16/24	Receipt and review of correspondence from Opposing Counsel Letha containing verifications for the supplemental discovery received from Defendant.	0.2	760	\$152.00	
Christopher Nichol	1/16/24	Receipt and review of correspondence from Opposing Counsel Letha explaining the amended nature of the document.	0.1	760	\$76.00	
Christopher Nichol	1/16/24	Receipt and review of correspondence from Opposing Counsel Sarah about the Belaire-West and key points of consideration for same. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	1/16/24	Receipt and review of correspondence from Opposing Counsel Sarah confirming that they have uploaded the employee contact list.	0.1	760	\$76.00	
Christopher Nichol	1/16/24	Receipt and review of verification for BRICK Response to Request for Production of Documents.	0.1	760	\$76.00	
Christopher Nichol	1/17/24	Draft correspondence to Opposing Counsel Sarah and Class admin approving of the mailing documents.	0.1	760	\$76.00	
Christopher Nichol	1/17/24	Receipt and review of correspondence from Opposing Counsel Sarah regarding her approval of the mailing documents.	0.1	760	\$76.00	
Christopher Nichol	1/17/24	Receipt and review of revised Mailing Document from Class Admin.	0.2	760	\$152.00	
Christopher Nichol	1/18/24	Brief exchange of correspondence with Opposing Counsel Sarah regarding meet and confer on request for production #4.	0.2	760	\$152.00	
Christopher Nichol	1/18/24	Draft correspondence to Opposing Counsel Sarah regarding the issue of a sampling and how the caselaw doesn't justify what they are proposing.	0.2	760	\$152.00	
Christopher Nichol	1/18/24	Receipt of email correspondence from Class Admin Evelyn confirming the mailing will occur on January 19th and the data will be released on February 28, 2024.	0.1	760	\$76.00	
Christopher Nichol	1/19/24	Receipt and review of confirmation from Admin as to the mailing. Memo to file regarding action plan for same.	0.2	760	\$152.00	
Christopher Nichol	1/22/24	Draft correspondence to Opposing Counsel Sarah letting her know I will send her a draft.	0.1	760	\$76.00	
Christopher Nichol	1/22/24	Draft correspondence to Opposing Counsel Sarah providing her with the draft of the CMC Statement.	0.1	760	\$76.00	
Christopher Nichol	1/22/24	Draft Joint Case Management Conference Statement.	0.8	760	\$608.00	
Christopher Nichol	1/22/24	Receipt and review of correspondence from Opposing Counsel Sarah asking for a draft of the CMC statement.	0.1	760	\$76.00	
Christopher Nichol	1/23/24	Draft correspondence to Opposing Counsel Sarah regarding acceptance of changes on CMC Statement. Memo to file regarding same.	0.2	760	\$152.00	

Christopher Nichol	1/23/24	Final Review of Joint CMC Statement; Receipt of version to be filed.	0.1	760	\$76.00
Christopher Nichol	1/23/24	Office conference between Attorney CEN and Attorney BBN regarding CMC Statement and the plan for upcoming CMC including scheduling preferences as it relates to motion for class certification.	0.2	760	\$152.00
Christopher Nichol	1/23/24	Receipt and review of correspondence from Opposing Counsel Sarah regarding her changes on the CMC Statement.	0.1	760	\$76.00
Christopher Nichol	1/26/24	Office conference between Attorney CEN and Paralegal SBC regarding upcoming Case Management Conference, class certification setting, and any additional discovery requests necessary.	0.2	760	\$152.00
Christopher Nichol	1/26/24	Office conference between Attorney LFW, Attorney CEN and Attorney BBN regarding belaire-west, additional discovery, upcoming CMC and action plan.	0.2	760	\$152.00
Christopher Nichol	1/26/24	Receipt and review of weekly report for Belaire West privacy mailing.	0.1	760	\$76.00
Christopher Nichol	1/29/24	Memorandum to file regarding extraction estimate from Defendant and concerns about their rounding as it impacts the class.	0.2	760	\$152.00
Christopher Nichol	1/29/24	Receipt and review of meet and confer email from Opposing Counsel Sarah about how they will have to manually extract the paystubs and it will take hundreds of hours. Discussion about random sampling.	0.3	760	\$228.00
Christopher Nichol	1/30/24	Draft meet and confer correspondence to Opposing Counsel Sarah regarding how the ADP paystubs don't have to be manually extracted and printed, its an online company and we already have paystubs from them that were not. Discussion of time to meet and confer over paystub issue.	0.3	760	\$228.00
Christopher Nichol	1/30/24	Office conference between Attorney CEN and Attorney BBN regarding outcome of Case Management Conference and next steps. Memo to file regarding same.	0.2	760	\$152.00
Christopher Nichol	1/30/24	Office conference between Attorney CEN and Paralegal SBC regarding meet and confer deadlines before Joint Case Management Statement is due.	0.1	760	\$76.00
Christopher Nichol	1/30/24	Office conference with Attorney CEN and Attorney BBN regarding the sampling of wage statements and Defendants argument that it is burdensome to produce them.	0.2	760	\$152.00
Christopher Nichol	1/30/24	Receipt and review of Case Management Conference tentative ruling. Review of new dates scheduled.	0.2	760	\$152.00
Christopher Nichol	2/1/24	Brief exchange of correspondence with Opposing Counsel Sarah to schedule a meet and confer call.	0.1	760	\$76.00
Christopher Nichol	2/1/24	Receipt and review of correspondence from Client Alex about deposition.	0.1	760	\$76.00
Christopher Nichol	2/5/24	Draft correspondence to Client explaining the timing of the deposition, providing him with the location and other information needed.	0.2	760	\$152.00
Christopher Nichol	2/5/24	Draft correspondence to Opposing Counsel Letha explaining that we're still not in receipt of the link and we've checked our junk mail. Discussion about sending it through another method.	0.2	760	\$152.00
Christopher Nichol	2/5/24	Draft correspondence to Opposing Counsel Letha to request link to view documents from production from last Friday.	0.1	760	\$76.00
Christopher Nichol	2/5/24	Draft correspondence to Opposing Counsel's office to confirm receipt of the documents.	0.1	760	\$76.00
Christopher Nichol	2/5/24	Office conference between Attorney CEN and Attorney BBN regarding deposition and clients resistance to being deposed.	0.1	760	\$76.00
Christopher Nichol	2/5/24	Receipt and review of correspondence from Opposing Counsel Letha about lawconnect being the method of sending the documents.	0.1	760	\$76.00
Christopher Nichol	2/5/24	Receipt and review of correspondence from Opposing Counsel Letha regarding amended discovery and documents being sent separately via link. Determine there was no link sent.	0.2	760	\$152.00
Christopher Nichol	2/5/24	Receipt and review of correspondence from Simplus regarding the weekly status report for mailing. Note 2 opt outs.	0.1	760	\$76.00
Christopher Nichol	2/5/24	Receipt and review of documents contained in additional production, which are time record correction worksheets and rest period waivers.	0.2	760	\$152.00
Christopher Nichol	2/5/24	Receipt of additional correspondence from Opposing Counsel Letha about document production and it being re-sent.	0.1	760	\$76.00
Christopher Nichol	2/5/24	Receipt of email about dropbox link being sent for document production and subsequent email containing dropbox link.	0.1	760	\$76.00
Christopher Nichol	2/5/24	Receipt of multiple emails from Client Alex about the deposition and his preference for not being deposed. Discussion regarding difficulties with deposition.	0.2	760	\$152.00
Christopher Nichol	2/6/24	Brief exchange of correspondence with Opposing Counsel Sarah regarding updated meet and confer time. Memo to file regarding same.	0.2	760	\$152.00
Christopher Nichol	2/6/24	Draft correspondence to Client Alex about the deposition, the attire he should wear and recommendation.	0.1	760	\$76.00
Christopher Nichol	2/6/24	Draft correspondence to deliver paystubs to Opposing Counsel Sarah regarding position that they cannot be produced electronically.	0.1	760	\$76.00
Christopher Nichol	2/6/24	Office conference between Attorney CEN and Attorney BBN about sampling protocols and wanting 1 month per quarter for sampling. Discussion about need for paystubs and sampling.	0.2	760	\$152.00
Christopher Nichol	2/6/24	Receipt and review of correspondence from Client Alex about the deposition, his attire, and questions about same.	0.1	760	\$76.00
Christopher Nichol	2/7/24	Office conference with CEN and Attorney BBN regarding upcoming deposition, mediation, and expert retention for damage analysis. Draft of email to experts regarding availability. Memo to file.	0.3	760	\$228.00
Christopher Nichol	2/8/24	Attend Deposition of Client Brick. Conferences with Client Brick before and after deposition.	6.2	760	\$4,712.00
Christopher Nichol	2/8/24	Draft correspondence to Expert Berger explaining that we'd like them primarily for litigation/cert but also maybe the 2nd mediation which could potentially be in July / August before cert deadline in Sept.	0.2	760	\$152.00
Christopher Nichol	2/8/24	Draft memorandum to team about outcome of deposition with emphasis on the weaknesses in the case related to breaks and reimbursements. Discussion of how the deposition avoided all of the areas where there are violations. Attach notes from deposition.	0.3	760	\$228.00
Christopher Nichol	2/8/24	Receipt and review of correspondence from Experts at Berger about what they would be retained for.	0.1	760	\$76.00
Christopher Nichol	2/8/24	Travel time back for Plaintiff's deposition from Walnut Creek to San Diego via Oakland Airport.	3.7	760	\$2,812.00
Christopher Nichol	2/8/24	Travel to Opposing Counsel's office in Walnut Creek via flight from San Diego to Oakland for Client's deposition.	3.4	760	\$2,584.00
Christopher Nichol	2/9/24	Brief exchange of correspondence with expert Berger regarding availability and recommendations.	0.1	760	\$76.00
Christopher Nichol	2/9/24	Office conference between Attorney CEN and Paralegal SBC regarding Deposition of Brick and details thereof.	0.2	760	\$152.00
Christopher Nichol	2/9/24	Receipt and review of weekly report from Simplus and note 5 opt outs out of 107.	0.1	760	\$76.00
Christopher Nichol	2/13/24	Draft correspondence to Opposing Counsel Sarah explaining that we want the actual wage statements under 226 and we'd do a 25% sample of 3 months of each year. Discussion about mediation and timing.	0.2	760	\$152.00
Christopher Nichol	2/13/24	Receipt and review of correspondence from Opposing Counsel Sarah about sampling, mediation, and meet and confer about same.	0.2	760	\$152.00
Christopher Nichol	2/14/24	Draft correspondence to Opposing Counsel Sarah about the discovery and our need for the sampling. Discussion of timelines for motion to compel and production of sampling.	0.2	760	\$152.00
Christopher Nichol	2/14/24	Office conference between Attorney CEN and Attorney BBN regarding the sampling, timeline for same, response to Opposing Counsel Sarah and follow up.	0.2	760	\$152.00
Christopher Nichol	2/14/24	Receipt and review of correspondence from Opposing Counsel Sarah regarding wage statements and how she has to look at our prior email, but she will provide the extension as requested.	0.1	760	\$76.00
Christopher Nichol	2/16/24	Office conference between Attorney CEN and Attorney BBN regarding opt-outs and comments from Client Brick about former vs current employees and willingness to testify.	0.1	760	\$76.00
Christopher Nichol	2/16/24	Receipt and review of correspondence from Admin containing opt out report. Determine the amount of opt outs is higher than anticipated. Memo to file regarding same.	0.2	760	\$152.00
Christopher Nichol	2/20/24	Draft correspondence to Client Alex about how the errata sheet works and how there isn't another deposition, it's just an opportunity to review the transcript. Discussion about how I can explain this to him on the phone.	0.2	760	\$152.00
Christopher Nichol	2/20/24	Draft correspondence to Client Alex explaining deposition outcome, strengths and weaknesses of case, errata sheet, and possible scheduling considerations for mediation and beyond.	0.3	760	\$228.00
Christopher Nichol	2/20/24	Receipt of correspondence from Client about him believing there will be another deposition and it being ridiculous.	0.1	760	\$76.00
Christopher Nichol	2/20/24	Receipt of correspondence from Client Brick regarding question about deposition outcome and mediation scheduling.	0.1	760	\$76.00
Christopher Nichol	2/22/24	Brief exchange of correspondence with Client Alex about him wanting to discuss employment issue with our office.	0.1	760	\$76.00
Christopher Nichol	2/22/24	Brief exchange of correspondence with Opposing Counsel Sarah about sampling and mediator availability.	0.1	760	\$76.00
Christopher Nichol	2/22/24	Draft correspondence to Opposing Counsel Sarah explaining we're fine with that mediator if he can be booked in August. Follow up about sampling.	0.2	760	\$152.00
Christopher Nichol	2/22/24	Office conference between Attorney CEN and Paralegal SBC regarding action to send Client Deposition transcript and explain Errata sheet.	0.1	760	\$76.00
Christopher Nichol	2/22/24	Receipt and review of correspondence from Opposing Counsel Sarah about the mediation.	0.1	760	\$76.00
Christopher Nichol	2/22/24	Receipt and review of correspondence from Vertex about transcript ready for notice of errata. Memo to file regarding same.	0.2	760	\$152.00
Christopher Nichol	2/22/24	Review and approve of correspondence to be sent to client for Deposition Transcript and Errata Sheet.	0.1	760	\$76.00
Christopher Nichol	2/26/24	Brief exchange with Opposing Counsel Sarah about setting a meeting to discuss meet and confer over sampling. Memo to file regarding same.	0.1	760	\$76.00

Christopher Nichol	2/26/24	Draft correspondence to Opposing Counsel Sarah about call to discuss wage statement sampling and mediation.	0.1	760	\$76.00	
Christopher Nichol	2/26/24	Office conference between Attorney CEN and Attorney BBN regarding mediation, sampling, call with Opposing Counsel Sarah.	0.1	760	\$76.00	
Christopher Nichol	2/26/24	Receipt and review of correspondence from Opposing Counsel Sarah about mediation dates, timing and then sampling and phone call to discuss same.	0.1	760	\$76.00	
Christopher Nichol	2/28/24	Office conference between Attorney CEN and Attorney BBN about outcome of sampling discussion and next steps with regards to the discovery as well as Belaire-West process.	0.2	760	\$152.00	
Christopher Nichol	2/28/24	Office conference between Attorney CEN and Attorney LFW and Attorney BBN about mediation, case status, sampling, belaire-west and preparing the case so we would be ready for a July mediation.	0.2	760	\$152.00	
Christopher Nichol	2/28/24	Telephone conference with Opposing Counsel Sarah related to her sampling and information about regular rate claim. Memo to file regarding same.	0.3	760	\$228.00	
Christopher Nichol	2/29/24	Draft correspondence to Opposing Counsel Sarah about mediation dates and sampling.	0.1	760	\$76.00	
Christopher Nichol	2/29/24	Draft correspondence to Opposing Counsel Sarah explaining that the wage statements are directly relevant to the claim and the other documents are different so we need the paystubs and we need them in a reasonable time.	0.1	760	\$76.00	
Christopher Nichol	2/29/24	Draft meet and confer correspondence to Opposing Counsel Sarah explaining we're good with everything they have proposed except this "Several Months" timeline and we might have to go in on a motion to compel if they won't do anything sooner so that we're being proactive.	0.2	760	\$152.00	
Christopher Nichol	2/29/24	Office conference between Attorney CEN and Attorney BBN about timeline for production of the sampling. Memo to file regarding same.	0.2	760	\$152.00	
Christopher Nichol	2/29/24	Receipt and review of correspondence from Opposing Counsel Sarah about the Sampling parameters that they can agree to and the timeline for same. Discussion about the pay periods sampled.	0.2	760	\$152.00	
Christopher Nichol	2/29/24	Receipt and review of correspondence from Opposing Counsel Sarah regarding how they will check on the timeline for the production of the paystubs.	0.1	760	\$76.00	
Christopher Nichol	2/29/24	Receipt and review of Data provided after Belaire-West mailing and Final Opt-Out report. Memorandum to file about next steps including draft of script and calling witnesses.	0.1	760	\$76.00	
Christopher Nichol	2/29/24	Receipt and review of email from Simpluris about upcoming Data Release.	0.1	760	\$76.00	
Christopher Nichol	3/1/24	Draft detailed plan for how to call witnesses on recently received Class Contact list and how to divide up the work for obtaining declarations from class members.	0.3	760	\$228.00	
Christopher Nichol	3/5/24	Receipt and review of correspondence from Opposing Counsel Sarah about the mediation and date. Memo to file regarding same.	0.1	760	\$76.00	
Christopher Nichol	3/7/24	Draft correspondence to Opposing Counsel Sarah explaining she was able to delay production for 6 months after we started meeting and conferring on it and she's won on the issue so just let it go.	0.2	760	\$152.00	
Christopher Nichol	3/7/24	Draft correspondence to Opposing Counsel Sarah regarding acceptance of timeline proposed by her and information regarding our position if they don't produce on April 30th.	0.2	760	\$152.00	
Christopher Nichol	3/7/24	Office conference between Attorney CEN, Senior Law Clerk JAM, Paralegal PRI, Paralegal SBC regarding witness calls to begin on Tuesday, March 12.	0.1	760	\$76.00	
Christopher Nichol	3/7/24	Receipt and review of correspondence from Opposing Counsel Sarah about her timeline to provide documents in 2 months. Memo to file regarding same.	0.1	760	\$76.00	
Christopher Nichol	3/7/24	Receipt and review of correspondence from Opposing Counsel Sarah about how she doesn't understand why we think the discovery should have been produced sooner and trying to blame us for her delay.	0.2	760	\$152.00	
Christopher Nichol	3/8/24	Memo to file regarding the Data Release and plan of action for calling witnesses.	0.1	760	\$76.00	
Christopher Nichol	3/12/24	Draft correspondence to Client Brick about Deposition Transcript and Errata sheet and him skimming the same.	0.1	760	\$76.00	
Christopher Nichol	3/12/24	Receipt and review of correspondence from Client Brick about the errata sheet and deposition transcript.	0.1	760	\$76.00	
Christopher Nichol	3/13/24	Receipt and review of invoice from Simpluris. Memo to file regarding same.	0.1	760	\$76.00	
Christopher Nichol	3/14/24	Receipt and review of correspondence related to mediation scheduling.	0.1	760	\$76.00	
Christopher Nichol	3/20/24	Receipt and review of correspondence from Mediator's office about information with mediation, including possibility of in person and mediation details.	0.2	760	\$152.00	
Christopher Nichol	3/27/24	Memo to file regarding Opposing Counsel selecting in person mediation in Northern CA when Defendants are there as well.	0.1	760	\$76.00	
Christopher Nichol	3/27/24	Office conference between Attorney CEN and Attorney LFW and Attorney BBN about mediation, location, and plan for moving case forward. Discussion about next steps.	0.2	760	\$152.00	
Christopher Nichol	3/27/24	Receipt and review of correspondence from Mediator's office about the mediation session in person in northern CA.	0.1	760	\$76.00	
Christopher Nichol	3/28/24	Draft lengthy correspondence to Client Alex explaining settlement posture and plan for mediation. Discussion about case status, joint prosecution agreement and next steps.	0.3	760	\$228.00	
Christopher Nichol	3/28/24	Draft of Joint Prosecution Agreement.	0.2	760	\$152.00	
Christopher Nichol	3/28/24	Receipt and review of correspondence from Client Brick about case status update and settlement.	0.1	760	\$76.00	
Christopher Nichol	3/29/24	(PCD 1.3) Cross-training between Attorney CEN, Paralegal SBC, Paralegal PRI, and Office Assistant AXL regarding calls to witnesses for Declarations.	1.3	760		988
Jacob Mendes	1/4/24	(PCD 0.2) Office conference between Senior Law Clerk JAM and Paralegal SBC regarding document production and discovery responses.	0.2	335		67
Jacob Mendes	1/4/24	(PCD 0.6) Familiarize with case facts; review pleadings, client documents, and intake notes.	0.6	335		201
Jacob Mendes	1/4/24	Anticipated client meeting between Attorney CEN, Senior Law Clerk JAM, Paralegal SBC to discuss deposition preparation and documents related to discovery.	0.2	335	\$67.00	
Jacob Mendes	1/5/24	Office conference between Attorney CEN, Senior Law Clerk JAM, and Paralegal SBC class certification, computation of damages, and case strategy.	0.3	335	\$100.50	
Jacob Mendes	1/5/24	Office conference between Senior Law Clerk JAM and Paralegal SBC regarding responses to Defendant's discovery document request.	0.2	335	\$67.00	
Jacob Mendes	1/9/24	Meeting between Attorney CEN, Senior Law Clerk JAM, Paralegal SBC and Mr. Brick regarding upcoming deposition preparation, discovery inquiries, document production, and assessment of claims.	1	335	\$335.00	
Jacob Mendes	1/9/24	Office conference between Attorney CEN, Senior Law Clerk JAM, and Paralegal SBC regarding requirements for class certification, Belaire notices, and case law pertaining to rounding employee time entries.	0.5	335	\$167.50	
Jacob Mendes	1/16/24	Receipt and review of internal memorandum from Attorney CEN regarding analysis on Supplemental Discovery Responses	0.1	335	\$33.50	
Jacob Mendes	1/23/24	Receipt and review of email correspondence from Attorney CEN regarding status of Belaire-West notice.	0.1	335	\$33.50	
Jacob Mendes	1/24/24	Receipt and review of Joint CMC Statement.	0.1	335	\$33.50	
Jacob Mendes	1/31/24	Receipt and review of CMC Tentative Ruling.	0.1	335	\$33.50	
Jacob Mendes	2/6/24	Receipt and brief review of Opposing Counsel Document Production	0.1	335		33.5
Jacob Mendes	2/9/24	Receipt and review of internal memorandum from Attorney CEN regarding recap and notes from deposition of Mr. Brick.	0.1	335		33.5
Jacob Mendes	3/6/24	Receipt and review of Simpluris Docs.	0.1	335	\$33.50	
Jacob Mendes	3/7/24	(PCD 0.1) Office conference between Attorney CEN, Senior Law Clerk JAM, Paralegal PRI, Paralegal SBC regarding witness calls to begin on Tuesday, March 12.	0.1	335		33.5
Jacob Mendes	3/13/24	Receipt and review of email correspondence from Client regarding Deposition Transcript and Errata.	0.1	335	\$33.50	
Jacob Mendes	4/2/24	Review of email correspondence from Attorney CEN regarding trial update, class action timeline, and settlement negotiations.	0.1	400	\$40.00	
Jacob Mendes	4/16/24	Office conference between Attorney LFW, Senior Law Clerk JAM, and Paralegal SBC regarding action to begin obtaining class members' declarations.	0.2	400	\$80.00	
Jacob Mendes	4/23/24	Office conference between Paralegal PRI, Senior Law Clerk JAM, and Paralegal SBC regarding witness calls for Declarations to be executed, and Paralegal ACV to take over for calls in Senior Law Clerk Senior Law Clerk JAM absence.	0.1	400	\$40.00	
Jacob Mendes	1/27/25	Receipt and review of Class Action Settlement Agreement and Motion for Preliminary Approval.	0.1	630	\$63.00	
Jocelyn Arteaga	11/13/23	(PCD 0.2) Draft of the Proof of Service.	0.2	145		29
Jocelyn Arteaga	4/24/24	Receipt of, save to client file and sent to case staffers the Joint Case Management Statement - April 30 2024 - NN.	0.1	200	\$20.00	
Jocelyn Arteaga	7/11/24	(PCD 0.1) Draft internal memo to file regarding question of case management conference.	0.1	200		20
Jocelyn Arteaga	7/24/24	(PCD 0.1) Receipt of, save to client file and sent to case staffers the Joint Case Management Statement - July 30 2024.	0.1	200		20
Jocelyn Arteaga	11/12/24	(PCD 0.1) Draft of email correspondence to Attorney Nevells and Nichols regarding joint case management conference.	0.1	200		20
Jocelyn Arteaga	1/23/25	(PCD 0.1) Check register of actions to confirm date of case management conference. Draft internal memo to file regarding case management statement.	0.1	200		20
Jocelyn Arteaga	2/26/25	(PCD 0.1) Review tentative ruling for Motion for Preliminary Approval of Settlement and Case Management Conference. Draft internal memo to file regarding same.	0.3	200	\$60.00	
Jocelyn Arteaga	3/17/25	Receipt of, save to client file and sent to case staffers Settlement Agreement - Memorandum of Understanding - Cal Hydronics- SIGNED.	0.1	200	\$20.00	
Jocelyn Arteaga	3/20/25	Receipt of, save to client file and sent to case staffers the Motion for Preliminary Approval - Supplemental Declaration of Webb.	0.1	200	\$20.00	

Jocelyn Arteaga	3/26/25	(PCD 0.2) Review tentative ruling for Motion for Preliminary Approval of Settlement. Draft internal memo to file regarding same. Draft of calendar entry regarding CMC continued to August 18, 2025.	0.3	200	\$60.00	
Karla Roman	2/20/25	(PCD 0.1) Cross-calendar reminder to review tentative ruling for Motion for Preliminary Approval.	0.1	240		24
Katherine Cervante	3/29/24	(PCD 1.3) Cross-training between Attorney CEN, Paralegal SBC, Paralegal PRI, and Office Assistant AXL regarding calls to witnesses for Declarations.	1.3	640		832
Katherine Cervante	1/27/25	review of sample	0.1	720		72
Katherine Cervante	1/29/25	Draft Declaration of Attorney LFW in support of Motion for Preliminary Class Approval.	2.6	720	\$1,872.00	
Kelley Kilgore	11/9/23	(PCD 2.0) Receipt of, save to client file and sent to case staffers the CHC BRICK - 5001-5194	2.7	120	\$324.00	
Kelley Kilgore	11/16/23	(PCD 1.0) California Hydronics File Save Project.	1	120		120
Kelley Kilgore	11/17/23	Receipt of, save to client file and sent to case staffers the Notice of Association - Webb.	0.1	120	\$12.00	
Kelley Kilgore	11/20/23	(PCD 2.4) Receipt of, save to client file and sent to case staffers CHC 7488-7606.	2.4	120		288
Kelley Kilgore	11/28/23	Receipt of, save to client file and sent to case staffers the Notice of Deposition - Alexander Brick.	0.1	120	\$12.00	
Kelley Kilgore	11/30/23	Receipt of, save to client file and sent to case staffers the Amended Notice of Deposition - Alexander Brick.	0.1	120	\$12.00	
Kelley Kilgore	12/12/23	(PCD 0.1) Receipt and organization of client documents. Create file name, bates number for identification, and send to case staffers. CALIFORNIA HYDRONICS Request for Production of Documents to BRICK - Set One (1).	0.2	120		24
Kelley Kilgore	1/9/24	Receipt and organization of client documents. Create file name, bates number for identification, and send to case staffers. CHC 010569 - Rest Period Waiver CHC 010570 - 010585 - Alexander Brick Time Records	0.1	120	\$12.00	
Kelley Kilgore	3/5/24	Receipt and organization of client documents. Create file name, bates number for identification, and send to case staffers. Release List Simpluris Final Report - 2024 02 Feb 28	0.1	145	\$14.50	
Kelley Kilgore	4/26/24	Receipt and organization of client documents. Create file name, bates number for identification, and send to case staffers. CHC 011016 - CHC 011101 - 2018 Pay Records CHC 011102 - CHC 011343 - 2019 Pay Records CHC 011344 - CHC 011579 - 2020 Pay Records CHC 011580 - CHC 011797 - 2021 Pay Records CHC 011798 - CHC 012028 - 2022 Pay Records CHC 012029 - CHC 012237 - 2023 Pay Records	0.1	215	\$21.50	
Kelley Kilgore	5/1/24	Receipt and organization of client documents. Create file name, bates number for identification, and send to case staffers. Minute Order - Joint Case Management Statement - 2024 07 Jul 30	0.1	215	\$21.50	
Kelley Kilgore	7/9/24	Receipt and organization of client documents. Create file name, bates number for identification, and send to case staffers. CHC Mediation Brief - Exhibits IACUZZI Letter From 2024 07 Jul 09 - re Mediation Brief	0.1	215	\$21.50	
Kelley Kilgore	7/10/24	Receipt and organization of client documents. Create file name, bates number for identification, and send to case staffers. NICHOLS Letter From 2024 07 Jul 10 - Plaintiff's Mediation Brief	0.1	215	\$21.50	
Kelley Kilgore	12/3/24	(PCD 0.2) Draft/send email to Alameda for Remote Appearance for California Hydronics.	0.2	215		43
Kelley Kilgore	12/3/24	Receipt and organization of client documents. Create file name, bates number for identification, and send to case staffers. Joint Case Management Statement - 2024 12 Dec 05	0.1	215	\$21.50	
Kelley Kilgore	1/15/25	Receipt and organization of client documents. Create file name, bates number for identification, and send to case staffers. Class Action and PAGA Settlement Agreement	0.1	215	\$21.50	
Kelley Kilgore	2/3/25	Receipt and organization of Motion for Preliminary Approval - Declaration of Brick - SIGNED, Motion for Preliminary Approval - Declaration of Jodey Lawrence, Motion for Preliminary Approval - Declaration of Kyle Nordrehaug, Motion for Preliminary Approval - Declaration of Nevels, Motion for Preliminary Approval - Declaration of Webb, Motion for Preliminary Approval - Memorandum of Points and Authorities, Motion for Preliminary Approval - Notice, Motion for Preliminary Approval - Proposed Order, save to client file, and draft of internal memo regarding the same.	0.3	215	\$64.50	
Kelley Kilgore	2/21/25	Draft of email correspondence to Alameda Court regarding remote appearance for 2025 02 Feb 27.	0.3	215	\$64.50	
Kelley Kilgore	3/11/25	Receipt and organization of Motion for Preliminary Approval - Order, save to client file, and draft of internal memo regarding the same.	0.1	215	\$21.50	
Kelley Kilgore	4/1/25	Receipt and organization of Notice of Change of Address of Counsel - California Hydronics, save to client file, and draft of internal memo regarding the same.	0.1	215	\$21.50	
Kelley Kilgore	4/4/25	Receipt and organization of Motion for Preliminary Approval - Order - 2025 03 Mar 27, save to client file, and draft of internal memo regarding the same.	0.1	215	\$21.50	
Kelley Kilgore	4/4/25	Receipt and organization of Motion for Preliminary Approval of Settlement - Order save to client file, and draft of internal memo regarding the same.	0.1	215	\$21.50	
Keren Alvarado	3/12/24	Simpluris fee for Notice. 24032-P	1	320	\$320.00	
Lenden Webb	11/29/23	Receipt and review of correspondence regarding deposition; draft and send correspondence regarding same.	0.1	920	\$92.00	
Lenden Webb	1/9/24	Office conference between Attorney Attorney CEN and Attorney Attorney LFW and Attorney BBN about main issues in California Hydronics matter including overtime rate being wrong as it is not based on the "regular" rate and rounding issues. Discussion of unique behavioral issue that our client was accused of.	0.3	920	\$276.00	
Lenden Webb	1/11/24	Office conference with Attorney LFW, Paralegals SBC, MED, PRI, regarding case status.	0.1	920	\$92.00	
Lenden Webb	1/26/24	Office conference between Attorney LFW, Attorney CEN and Attorney BBN regarding belaire-west, additional discovery, upcoming CMC and action plan.	0.2	920	\$184.00	
Lenden Webb	2/5/24	Draft of email correspondence to Client confirming that the deposition is necessary.	0.1	920	\$92.00	
Lenden Webb	2/9/24	Office conference between Attorney LFW, Paralegal PRI and Paralegal MED regarding Bel Air notice process for the Declarations of the class members that will be needed.	0.3	920	\$276.00	
Lenden Webb	3/1/24	Draft internal memo to case staff regarding action plan for contacting all witnesses to issue Declarations to.	0.2	920	\$184.00	
Lenden Webb	3/1/24	Draft internal memo to case staff regarding updated action plan for execution of Declarations for 100+ witnesses.	0.1	920	\$92.00	
Lenden Webb	3/8/24	Draft internal memo to case staff regarding training for the Declaration of witnesses project.	0.1	920	\$92.00	
Lenden Webb	3/14/24	Receipt and review of correspondence regarding mediation; draft and send correspondence regarding same.	0.1	920	\$92.00	
Lenden Webb	3/25/24	Draft internal memo to case staffers regarding mediation service agreement.	0.1	920	\$92.00	
Lenden Webb	3/26/24	Draft of email correspondence to Mediator regarding exchange of mediation briefs.	0.1	920	\$92.00	
Lenden Webb	3/27/24	Office conference between Attorney CEN and Attorney LFW and Attorney BBN about mediation, location, and plan for moving case forward. Discussion about next steps.	0.2	920	\$184.00	
Lenden Webb	3/27/24	Receipt and review of correspondence regarding additional mediation session; draft and send correspondence regarding same.	0.2	920	\$184.00	
Lenden Webb	4/2/24	Draft of internal email to case staff regarding Witness Declaration Notes.	0.1	1080	\$108.00	
Lenden Webb	4/10/24	Draft internal memo to file to Office Assistant IVA regarding Case Management Statement.	0.1	1080	\$108.00	
Lenden Webb	4/11/24	Office conference between Attorney LFW and Paralegal PRI regarding the witness declarations script to begin making calls.	0.2	1080	\$216.00	
Lenden Webb	4/16/24	Draft internal memo regarding review of employment survey and to see if there are overtime calculation issues.	0.1	1080	\$108.00	
Lenden Webb	4/16/24	Office conference between Attorney LFW and Paralegal PRI regarding action plan to conduct the employment survey on a few batch of witnesses.	0.1	1080	\$108.00	
Lenden Webb	4/16/24	Office conference between Attorney LFW, Senior Law Clerk JAM, and Paralegal SBC regarding action to begin obtaining class members' declarations.	0.2	1080	\$216.00	
Lenden Webb	4/22/24	Draft of email correspondence to Opposing Counsel regarding joint case management statement as well as providing correct emails of Co-Counsel.	0.1	1080	\$108.00	
Lenden Webb	4/23/24	Office conference between Attorney LFW and Paralegal PRI regarding case status and action plan to start making witness calls and executing Declarations.	0.1	1080	\$108.00	
Lenden Webb	4/25/24	Office conference between Attorney LFW and Paralegal PRI regarding providing 10 witness names to Attorney LFW for calls to cross-train with Paralegal PRI/Paralegal SBC/Office Assistant AXL.	0.1	1080	\$108.00	
Lenden Webb	4/29/24	Draft of internal memo to case staff regarding taking immediate action on potential witness list.	0.1	1080	\$108.00	
Lenden Webb	5/1/24	Draft internal memo to file to Attorney CEN regarding Notice of Change of Handling Attorney and Association of Counsel.	0.1	1080	\$108.00	
Lenden Webb	5/2/24	Draft of email correspondence to Mediator and Opposing Counsel regarding attendance for mediation scheduled on June 16, 2024.	0.1	1080	\$108.00	
Lenden Webb	5/3/24	Draft of email correspondence to Sarah Lucas re California Hydronics mediation	0.1	540	\$54.00	
Lenden Webb	5/6/24	Draft of email correspondence to Opposing Counsel regarding allocation of Mediator travel fees.	0.1	1080	\$108.00	

Lenden Webb	5/6/24	Draft of internal memo to Office Manager AJD regarding flight booking for Mediation.	0.1	1080	\$108.00	
Lenden Webb	5/13/24	Draft of internal memo to Paralegal SBC regarding action on mediation scheduling.	0.1	1080	\$108.00	
Lenden Webb	6/13/24	Office conference between Attorney LFW and Paralegal SBC regarding status of witness calls and upcoming mediation. Action for Paralegal SBC to check in with Attorney CEN regarding case actions.	0.1	1080	\$108.00	
Lenden Webb	7/8/24	Office conference between Attorney LFW and Paralegal SBC regarding upcoming mediation and brief status.	0.1	1080	\$108.00	
Lenden Webb	7/8/24	Office conference between Attorney LFW and Paralegal SBC regarding upcoming mediation.	0.1	1080	\$108.00	
Lenden Webb	7/11/24	Draft internal memo to file regarding post mediation course of action.	0.1	1080	\$108.00	
Lenden Webb	7/18/24	Review of draft of Memorandum of Understanding. Draft of email correspondence to Attorney CEN and Attorney BNN regarding edits to Memorandum of Understanding.	0.2	1080	\$216.00	
Lenden Webb	8/12/24	Draft of email correspondence to regarding expected timeline for court approval process of settlement.	0.1	1080	\$108.00	
Lenden Webb	12/9/24	Draft of internal memo to Co-Counsel and staffers regarding updated hearing dates from tentative rulings.	0.1	1080	\$108.00	
Lenden Webb	1/8/25	Draft of email correspondence to Co-Counsel regarding signed Class Action Settlement Agreement.	0.1	1080	\$108.00	
Lenden Webb	1/29/25	Draft internal memo to file regarding confirmation of due date for Supporting Declaration.	0.1	1080	\$108.00	
Lenden Webb	1/30/25	Approve all redlines on Motion for Preliminary Approval and execute the same. Draft internal memo to file regarding proposal to calculate costs at the Preliminary Motion and executed copy of Motion for Preliminary Approval.	0.3	1080	\$324.00	
Lenden Webb	3/17/25	Receipt and review of Settlement Agreement Memorandum of Understanding executed by Plaintiffs. Execution of the same.	0.1	1080	\$108.00	
Lenden Webb	3/20/25	Receipt and review of internal memo regarding updated Declaration for Motion for Preliminary Approval. Review Declaration and draft internal memo to file regarding approval of the same and file saving the same.	0.1	1080	\$108.00	
Lenden Webb	4/3/25	Draft internal memo to file regarding task to compile all fees for Motion for Final Approval of Settlement.	0.1	1080	\$108.00	
Lenden Webb	4/3/25	Draft internal memo to file regarding task to file save court order granting preliminary approval of settlement.	0.1	1080	\$108.00	
Lenden Webb	4/3/25	Draft of email correspondence to Co-Counsel regarding deadline for staffer to send billing entries for matter by end of April.	0.1	1080	\$108.00	
Lenden Webb	4/10/25	Receipt and review of email correspondence from Co-Counsel regarding fully executed copy of Settlement Agreement. Draft internal memo to file regarding task to file save the same.	0.1	1080	\$108.00	
Lourdes Escalante	11/8/23	(PCD 0.1) Draft of internal memo to Office Assistant KEL in regard to file transfer file save. Action for Office Assistant KEL to handle for the same.	0.1	250		25
Lourdes Escalante	11/8/23	(PCD 0.1) Review and revise of email correspondence in regard to Notice of Association of Counsel.	0.1	250		25
Lourdes Escalante	11/8/23	(PCD 0.2) Office conference between Paralegal LLE and Paralegal SBC regarding organization of case transfer documents in box folder.	0.2	250		50
Lourdes Escalante	11/8/23	Office conference between Paralegal LLE and Paralegal SBC in regard to case transfer and organization of files.	0.2	250	\$50.00	
Lourdes Escalante	11/9/23	(PCD 0.1) Office conference between Paralegal LVA and Paralegal LLE in regard to meet and confer deadline.	0.1	250		25
Lourdes Escalante	11/9/23	(PCD 0.2) Office conference between Legal Assistant CLM and Paralegal LLE in regard to remote appearance for Alameda County.	0.2	250		50
Lourdes Escalante	11/9/23	(PCD 0.3) Review and revise of case file, public email folder, and case transfer files to familiarize with case facts.	1	250		250
Lourdes Escalante	11/9/23	Draft of calendar entry for Case Management Statement.	0.1	250	\$25.00	
Lourdes Escalante	11/9/23	Draft of cross-calendar entry in regard to Meet and Confer Deadline.	0.1	250	\$25.00	
Lourdes Escalante	11/9/23	Draft of cross-calendar entry in regard to Motion to Compel Deadline.	0.1	250	\$25.00	
Lourdes Escalante	11/9/23	Office conference between Attorney CEN and Paralegal LLE in regard to upcoming deadlines. Action for Paralegal LLE to calendar for the same.	0.1	250	\$25.00	
Lourdes Escalante	11/29/23	Office conference between Legal Assistant CLM and Paralegal LLE in regard to client files and case transfer. Action for Legal Assistant CLM to handle for the same.	0.2	250	\$50.00	
Lourdes Escalante	11/30/23	(PCD 0.2) Office conference between Attorney CEN, Paralegal LLE and Paralegal SBC regarding file transfer and status of saving all case documents.	0.2	250		50
Lourdes Escalante	11/30/23	(PCD 0.2) Telephone conference between Paralegal LLE and Case Manager CLM regarding expectation for saving of the client transfer documents.	0.2	250		50
Madeleine Dearien	1/9/24	(PCD 0.2) Receipt and organization of Supplemental Discovery Responses, save to client file and draft internal memo to case staffer regarding the same.	0.3	240	\$72.00	
Madeleine Dearien	1/11/24	(PCD 0.1) Office conference with Attorney LFW, Paralegals SBC, MED, PRI, regarding case status.	0.1	240		24
Madeleine Dearien	1/16/24	Receipt and organization of Amended Supplemental Discovery Response, save to client file and draft internal memo to case staffer regarding the same.	0.1	240	\$24.00	
Madeleine Dearien	2/9/24	(PCD 0.3) Office conference between Attorney LFW and Paralegals PRI and MED regarding Bel Air notice process for the Declarations of the class members that will be needed.	0.3	280		84
Paola Gonzalez	12/11/23	(PCD 0.3) Office conference between Paralegal SBC and Office Assistant PGR regarding draft of Deposition preparation.	0.3	200		60
Paola Gonzalez	12/11/23	Draft of Deposition Preparation Letter to client.	0.3	200	\$60.00	
Priscilla Glaze	1/11/24	(PCD 0.1) Office conference with Attorney LFW, Paralegals SBC, MED, PRI, regarding case status.	0.1	280		28
Priscilla Glaze	1/16/24	(PCD 0.3) Receipt and organize Verified Response to Request for Production of Documents Set One by Alexander Brick from DocuSign; Save to case file and circulate to case staff.	0.4	280	\$28.00	84
Priscilla Glaze	2/5/24	(PCD 0.1) Receipt and organize amended Discovery Responses received from Opposing Counsel and circulate to case staff.	0.2	360	\$31.50	31.5
Priscilla Glaze	2/9/24	Office conference between Attorney LFW and Paralegals PRI and MED regarding Bel Air notice process for the Declarations of the class members that will be needed.	0.3	360		108
Priscilla Glaze	3/6/24	Receipt and review of Class list and Simpluris Final Report from Opposing Counsel; Organize Class list information and print to begin making telephone calls.	0.3	360		108
Priscilla Glaze	3/7/24	(PCD 0.1) Office conference between Attorney CEN, Senior Law Clerk JAM, Paralegal PRI, Paralegal SBC regarding witness calls to begin on Tuesday, March 12.	0.1	360		36
Priscilla Glaze	3/12/24	Draft internal memo to case staff regarding How To Make Calls to Potential Witnesses, in preparation for witness calls.	0.1	360	\$36.00	
Priscilla Glaze	3/12/24	Office conference with Attorney CEN regarding the scheduled training for witnesses to call.	0.1	360	\$36.00	
Priscilla Glaze	3/28/24	(PCD 0.1) Let case staff know about the CalHydronics witness training today at 9:00am; Get How To: Make Calls to Witnesses ready for training at 9:00am.	0.6	360	\$180.00	36
Priscilla Glaze	3/29/24	(PCD 0.1) Send case staff training notes.	0.1	360		36
Priscilla Glaze	4/2/24	Create spreadsheet of witness list and assign batches to case staff, in preparation for potential witness declarations; Draft internal memo to case staff regarding spreadsheet to use for witness calls.	0.8	360	\$288.00	
Priscilla Glaze	4/4/24	Draft Notice of Association of Counsel.	0.6	360	\$216.00	
Priscilla Glaze	4/8/24	Check case docket with the Court to verify case status and future case events.	0.2	360	\$72.00	
Priscilla Glaze	4/8/24	Draft of email correspondence to Attorney BBN, Attorney CEN, and Attorney LFW regarding case status and upcoming case events.	0.2	360	\$72.00	
Priscilla Glaze	4/11/24	Draft of email correspondence to Attorney CEN regarding the script to be used for the witness declarations.	0.1	360	\$36.00	
Priscilla Glaze	4/11/24	Office conference between Attorney LFW and Paralegal PRI regarding the witness declarations script to begin making calls.	0.2	360	\$72.00	
Priscilla Glaze	4/16/24	Check case status for the week and any new upcoming deadlines.	0.1	360	\$36.00	
Priscilla Glaze	4/16/24	Office conference between Attorney LFW and Paralegal PRI regarding action plan to conduct the employment survey on a few batch of witnesses.	0.1	360	\$36.00	
Priscilla Glaze	4/17/24	Draft of email correspondence to Attorney CEN in response to his email regarding service of the Notice of Association.	0.1	360	\$36.00	
Priscilla Glaze	4/17/24	Finalize Notice of Change of Handling Attorney and Notice of Association; Bill to Client.	0.3	360	\$108.00	
Priscilla Glaze	4/17/24	Receipt and organize fully executed JPA from Client via DocuSign; Circulate to case staff along with draft Notice of Association.	0.2	360	\$72.00	
Priscilla Glaze	4/19/24	Draft internal memo to LFW regarding case status and status on witnesses to be called for Declarations to be signed; Provide details on the script Attorney CEN is to draft; Circulate spreadsheet of employees to be used to determine who our witnesses will be.	0.8	360	\$288.00	
Priscilla Glaze	4/23/24	(PCD 0.1) Office conference between Paralegal PRI, Senior Law Clerk JAM, and Paralegal SBC regarding witness calls for Declarations to be executed, and Paralegal ACV to take over for calls in Senior Law Clerk JAM absence.	0.1	360		36
Priscilla Glaze	4/23/24	Office conference between Attorney LFW and Paralegal PRI regarding case status and action plan to start making witness calls and executing Declarations.	0.1	360	\$36.00	
Priscilla Glaze	4/23/24	Receipt and organize Notice of Change of Handling Attorney filed by the Court; Circulate to case staff.	0.2	360	\$72.00	
Priscilla Glaze	4/25/24	Draft of email correspondence to Attorney LFW with list of 10 witness names for Attorney LFW to utilize in calling for the first round of Declarations.	0.2	360	\$72.00	
Priscilla Glaze	4/25/24	Office conference between Attorney LFW and Paralegal PRI regarding providing 10 witness names to Attorney LFW for calls to cross-train with Paralegal PRI / Paralegal SBC / Office Assistant AXL.	0.1	360	\$36.00	
Priscilla Glaze	4/29/24	Check case status via case docket; Check for any and all outstanding items requiring attention; Send case status to case staff.	0.3	360	\$108.00	

Priscilla Glaze	5/2/24	Check case docket to figure out why the Court Clerk is sending notices only to Nevels Nichols, LLP and not Attorney LFW; Draft internal memo to case staff regarding information found and instructions when speaking to Court Clerk next week.	0.4	360	\$144.00	
Priscilla Glaze	5/13/24	Check case status with the Court and all Counsel; Draft internal memo to case staff regarding case status and current action plans.	0.2	360	\$72.00	
Priscilla Glaze	6/3/24	Check case status and all upcoming hearing events; Draft internal memo to case staff regarding case status and action plan for next steps.	0.2	360	\$72.00	
Priscilla Glaze	6/3/24	Draft internal memo to case staff regarding invoice received from Judicate West for mediation.	0.2	360	\$72.00	
Priscilla Glaze	6/3/24	Receipt and organize email correspondence regarding mediation confirmation from Joselyn Alexander at Judicate West; Circulate all mediation information to case staff, including all deadlines that are assigned.	0.5	360	\$180.00	
Priscilla Glaze	6/4/24	Troubleshoot Judicate West portal to access all mediation related material in preparation for mediation on July 16, 2024.	0.3	360	\$108.00	
Priscilla Glaze	6/12/24	Process all payments for mediation with Judicate West; Draft of email correspondence to Attorney CEN and Attorney BBN regarding our half of mediation being paid; Receipt and organize mediation documents uploaded by Judicate West; Circulate to case staff.	0.5	360	\$180.00	
Romina Machicao	3/27/25	(PCD 0.1) Office conference between Office Coordinator JVA and Office Assistant ROM regarding court remote appearance and action to call Alameda Court.	0.1	200		20
Romina Machicao	3/27/25	Office conference between Attorney LFW and Office Assistant ROM regarding remote appearance for Motion for preliminary Approval Settlement. Action to contact Office Coordinator JVA regarding the same matter.	0.1	200	\$20.00	
Romina Machicao	3/27/25	Telephone conference between Office Assistant ROM and Department 23 of Alameda Court to request remote appearance access information.	0.3	200	\$60.00	
Syann Cadogan	11/8/23	(PCD 0.1) Draft of email correspondence to Opposing Counsel regarding service of Notice of Association of Counsel. File Notice via One Legal. Draft internal memo to case staffers regarding the same.	0.3	310	\$31.20	
Syann Cadogan	11/8/23	(PCD 0.1) Draft of Proof of Service for Notice of Association of Counsel.	0.2	310	\$31.20	31.2
Syann Cadogan	11/8/23	(PCD 0.2) Office conference between Paralegal LLE and Paralegal SBC in regard to case transfer and organization of files.	0.2	310		62
Syann Cadogan	11/8/23	(PCD 0.2) Office conference between Paralegal LLE and Paralegal SBC regarding organization of case transfer documents in box folder.	0.2	310		62
Syann Cadogan	11/8/23	Draft Notice of Association of Counsel.	0.3	310	\$93.00	
Syann Cadogan	11/8/23	Draft of email correspondence to Mr. Bhowmik regarding draft of Notice of Association of Counsel.	0.1	310	\$31.00	
Syann Cadogan	11/8/23	Receipt and organization of case transfer files. Save all files to box folder.	0.1	310	\$31.00	
Syann Cadogan	11/8/23	Receipt and review of signed Notice of Association of Counsel; save to Client folder; prepare for filing.	0.2	310	\$62.00	
Syann Cadogan	11/13/23	Draft of email correspondence to Department 23 regarding request for remote appearance to Case Management Conference.	0.1	310	\$31.00	
Syann Cadogan	11/13/23	Receipt and review of tentative ruling on Case Management Conference; save to Client file; update new hearing date; draft of internal memorandum to case staffers regarding the same.	0.2	310	\$62.00	
Syann Cadogan	11/17/23	(PCD 0.1) Draft internal memo to case staffers regarding status of file transfer and organization of all case documents.	0.1	310		31
Syann Cadogan	11/30/23	(PCD 0.2) Office conference between Attorney CEN, Paralegal LLE and Paralegal SBC regarding file transfer and status of saving all case documents.	0.2	310		62
Syann Cadogan	12/8/23	(PCD 0.2) Draft internal memo to case staffer regarding draft of Deposition Preparation letter to client.	0.2	310		62
Syann Cadogan	12/11/23	(PCD 0.1) Continue draft of Deposition Preparation letter.	0.1	310		31
Syann Cadogan	12/11/23	(PCD 0.1) Office conference between Attorney CEN and Paralegal SBC regarding draft of Deposition preparation letter.	0.1	310		31
Syann Cadogan	12/11/23	(PCD 0.2) Review draft of Deposition Preparation letter.	0.2	310		62
Syann Cadogan	12/11/23	(PCD 0.3) Office conference between Paralegal SBC and Office Assistant PGR regarding draft of Deposition preparation.	0.3	310		93
Syann Cadogan	12/11/23	Draft of email correspondence to Client regarding Deposition preparation.	0.1	310	\$31.00	
Syann Cadogan	12/12/23	(PCD 0.1) Receipt and review of email correspondence from Client regarding Deposition location and request to move.	0.1	310		31
Syann Cadogan	12/13/23	Office conference between Paralegal SBC and Office Assistant ACB in regard to action for Office Assistant ACB to draft discovery shell.	0.1	310	\$31.00	
Syann Cadogan	12/18/23	(PCD 0.1) Office conference between Attorney CEN and Paralegal SBC regarding objections to Requests for Production of Documents.	0.1	310		31
Syann Cadogan	12/18/23	(PCD 0.2) Continue draft of objections to Discovery Requests.	0.7	310	\$155.00	62
Syann Cadogan	12/18/23	(PCD 0.2) Draft of objections to Defendant's Request for Production of Documents.	0.8	310	\$186.00	62
Syann Cadogan	12/19/23	(PCD 0.1) Draft internal memo to case staffer regarding organization of case folder and Client documents.	0.1	310	\$31.00	
Syann Cadogan	12/19/23	(PCD 0.2) Telephone conference between Paralegal SBC and Case Manager CLM regarding organization and bates numbering of client documents.	0.2	310	\$62.00	
Syann Cadogan	12/20/23	(PCD 0.1) Draft of email correspondence to Client regarding Discovery responses to request for production of documents and box shared upload link.	0.3	310	\$31.00	62
Syann Cadogan	12/20/23	(PCD 0.1) Office conference between Attorney CEN and Paralegal SBC regarding discovery responses and request for documentation from Client.	0.1	310		31
Syann Cadogan	12/20/23	(PCD 0.1) Receipt and review of email correspondence from Client regarding location of responsive discovery documents.	0.1	310		31
Syann Cadogan	12/21/23	(PCD 0.1) Receipt and review of email correspondence from Client regarding defendant's destruction of emails to employees.	0.1	310		31
Syann Cadogan	12/21/23	Draft of email correspondence to Client regarding request for employment documents for discovery responses.	0.1	310	\$31.00	
Syann Cadogan	1/3/24	(PCD 0.1) Draft internal memo to case staffers regarding discovery response deadlines and Client's employment documents.	0.1	310		31
Syann Cadogan	1/3/24	(PCD 0.1) Office conference between Attorney CEN and Paralegal SBC regarding documents to include in responses to Request for Production of Documents.	0.1	310		31
Syann Cadogan	1/4/24	(PCD 0.1) Office conference between Attorney CEN and Paralegal SBC regarding responses to Request for Production of Documents and available production.	0.1	310		31
Syann Cadogan	1/4/24	(PCD 0.2) Anticipated client meeting between Attorney CEN, Senior Law Clerk JAM, Paralegal SBC to discuss deposition preparation and documents related to discovery.	0.2	310		62
Syann Cadogan	1/4/24	(PCD 0.2) Office conference between Senior Law Clerk JAM and Paralegal SBC regarding document production and discovery responses.	0.2	310		62
Syann Cadogan	1/5/24	(PCD 0.1) Receipt and review of email correspondence from Client regarding meeting availability and deposition preparation.	0.1	310		31
Syann Cadogan	1/5/24	Office conference between Attorney CEN, Senior Law Clerk JAM, and Paralegal SBC class certification, computation of damages, and case strategy.	0.3	310	\$93.00	
Syann Cadogan	1/5/24	Office conference between Senior Law Clerk JAM and Paralegal SBC regarding responses to Defendant's discovery document request.	0.2	310	\$62.00	
Syann Cadogan	1/8/24	(PCD 0.4) Finalize Discovery responses to Request for Production of Documents.	1.7	310	\$403.00	124
Syann Cadogan	1/9/24	(PCD 0.1) Finalize draft of Responses to Request for Production of Documents. Draft internal memo to case staffers regarding the same.	0.4	310	\$93.00	31
Syann Cadogan	1/9/24	Meeting between Attorney CEN, Senior Law Clerk JAM, Paralegal SBC and Mr. Brick regarding upcoming deposition preparation, discovery inquiries, document production, and assessment of claims.	1	310	\$310.00	
Syann Cadogan	1/9/24	Office conference between Attorney CEN, Senior Law Clerk JAM, and Paralegal SBC regarding requirements for class certification, Belaire notices, and case law pertaining to rounding employee time entries.	0.5	310	\$155.00	
Syann Cadogan	1/10/24	(PCD 0.2) Office conference between Paralegal SBC and Office Assistant ACB in regard to Attorney CEN's travel arrangements to attend Alex Brick's deposition.	0.2	310	\$31.00	62
Syann Cadogan	1/10/24	Finalize draft of responses to Request for Production of Documents with new Client documents.	0.3	310	\$93.00	
Syann Cadogan	1/11/24	(PCD 0.2) Receipt and review of Supplemental Discovery responses from Opposing Counsel.	0.2	310		62
Syann Cadogan	1/11/24	Finalize draft of Discovery responses. Draft of email correspondence to Client regarding verifications. Create docuSign for Client to sign.	0.2	310	\$62.00	
Syann Cadogan	1/11/24	Office conference with Attorney LFW, Paralegals SBC, MED, PRI, regarding case status.	0.1	310	\$31.00	
Syann Cadogan	1/12/24	(PCD 0.1) Draft internal memo to case staffer regarding status of verified Discovery responses.	0.1	310		31
Syann Cadogan	1/12/24	(PCD 0.2) Office conference between Office Assistant ALY and Paralegal SBC regarding correspondence with Client for status of verified Discovery responses.	0.2	310		62
Syann Cadogan	1/16/24	(PCD 0.1) Receipt and organization of verified Discovery responses. Prepare responses for service. Draft of email correspondence to Opposing Counsel regarding the same.	0.4	310	\$124.00	
Syann Cadogan	1/16/24	(PCD 0.1) Receipt and review of completed verification from DocuSign. Draft internal memo to case staffers regarding the same.	0.1	310		31
Syann Cadogan	1/17/24	(PCD 0.1) Draft of email correspondence to Opposing Counsel regarding box link access to discovery document production.	0.1	310		31
Syann Cadogan	1/19/24	(PCD 0.1) Receipt and review of email correspondence regarding Belaire West Notice mailing and preparation for Client calls.	0.1	310		31
Syann Cadogan	1/23/24	Finalize draft of Joint Case Management Conference Statement. Draft proof of service. Prepare for filing.	0.2	310	\$62.00	
Syann Cadogan	1/23/24	Receipt and organization of filed Joint Case Management Conference Statement from One Legal. Draft internal memo to case staffers regarding the same.	0.1	310	\$31.00	

Syann Cadogan	1/26/24	(PCD 0.2) Office conference between Attorney CEN and Paralegal SBC regarding upcoming Case Management Conference, class certification setting, and any additional discovery requests necessary.	0.2	310		62
Syann Cadogan	1/29/24	(PCD 0.1) Office conference between Paralegal SBC and Office Assistant ACB regarding request for remote appearance links for Case Management Conference in Alameda County.	0.1	310		31
Syann Cadogan	1/29/24	Draft of email correspondence to Court regarding request for remote appearance link for Case Management Conference.	0.1	310	\$31.00	
Syann Cadogan	1/30/24	(PCD 0.1) Attempted telephone conference between Court and Paralegal SBC regarding tentative ruling for Case Management Conference	0.1	310		31
Syann Cadogan	1/30/24	(PCD 0.1) Office conference between Attorney CEN and Paralegal SBC regarding meet and confer deadlines before Joint Case Management Statement is due.	0.1	310		31
Syann Cadogan	1/30/24	(PCD 0.1) Receipt and review of email correspondence from Department 23 regarding status of Case Management Hearing.	0.1	310		31
Syann Cadogan	1/30/24	Calendar hearing dates provided in tentative ruling for Case Management Conference. Draft internal memo to case staffers regarding the same.	0.2	310	\$62.00	
Syann Cadogan	1/30/24	Receipt and organization of tentative ruling for Case Management Conference. Save to Client file and draft internal memo to case staffers regarding the same.	0.2	310	\$62.00	
Syann Cadogan	2/5/24	(PCD 0.1) Receipt and review of email correspondence from Opposing Counsel regarding amended Discovery responses.	0.1	335		33.5
Syann Cadogan	2/5/24	(PCD 0.2) Receipt and organization of document production from Opposing Counsel. Review document type. Save to Client file. Draft internal memo to case staffers regarding the same.	0.4	335	\$67.00	67
Syann Cadogan	2/9/24	(PCD 0.2) Office conference between Attorney CEN and Paralegal SBC regarding Deposition of Brick and details thereof.	0.2	335		67
Syann Cadogan	2/22/24	(PCD 0.1) Office conference between Attorney CEN and Paralegal SBC regarding action to send Client Deposition transcript and explain Errata sheet.	0.1	335		33.5
Syann Cadogan	2/22/24	(PCD 0.2) Draft of email correspondence to Client regarding Deposition transcript, requirements for errata sheet, and deadlines to complete.	0.5	335	\$100.50	67
Syann Cadogan	3/7/24	(PCD 0.1) Office conference between Attorney CEN, Senior Law Clerk JAM, Paralegal PRI, Paralegal SBC regarding witness calls to begin on Tuesday, March 12.	0.1	335		33.5
Syann Cadogan	3/12/24	(PCD 0.1) Receipt and review of email correspondence from Client regarding review of Deposition transcript and request for changes.	0.1	335		33.5
Syann Cadogan	3/12/24	Draft of email correspondence to Client regarding confirmation of Errata sheet and request for changes to Deposition transcript.	0.1	335	\$33.50	
Syann Cadogan	3/29/24	(PCD 1.3) Cross-training between Attorney CEN, Paralegal SBC, Paralegal PRI, and Office Assistant AXL regarding calls to witnesses for Declarations.	1.3	335		435.5
Syann Cadogan	4/23/24	Office conference between Paralegal PRI, Senior Law Clerk JAM, and Paralegal SBC regarding witness calls for Declarations to be executed, and Paralegal ACV to take over for calls in Senior Law Clerk Senior Law Clerk JAM absence.	0.1	375	\$37.50	
Syann Cadogan	4/26/24	(PCD 0.1) Receipt and review of email correspondence from Opposing Counsel regarding service of payroll records.	0.1	375		37.5
Syann Cadogan	5/13/24	(PCD 0.1) Receipt and review of email correspondence from Client and response from Attorney CEN regarding upcoming mediation and potential settlement outcome.	0.1	375		37.5
Syann Cadogan	5/17/24	(PCD 0.1) Receipt and review of email correspondence regarding availability of Deposition transcript for Brick. Draft internal memo case staffer regarding the same.	0.1	375		37.5
Syann Cadogan	6/13/24	(PCD 0.1) Office conference between Attorney LFW and Paralegal SBC regarding status of witness calls and upcoming mediation. Action for Paralegal SBC to check in with Attorney CEN regarding case actions.	0.1	375		37.5
Syann Cadogan	6/13/24	(PCD 0.1) Receipt and review of email correspondence from Judicate West regarding deadlines for Mediation.	0.1	375		37.5
Syann Cadogan	6/13/24	(PCD 0.1) Receipt and review of voicemail from Judicate West regarding payment for mediation and credit.	0.1	375		37.5
Syann Cadogan	7/8/24	(PCD 0.1) Draft internal memo to Attorney CEN regarding draft of mediation brief.	0.1	375		37.5
Syann Cadogan	7/8/24	(PCD 0.1) Office conference between Attorney LFW and Paralegal SBC regarding upcoming mediation and brief status.	0.1	375		37.5
Syann Cadogan	7/8/24	(PCD 0.1) Office conference between Attorney LFW and Paralegal SBC regarding upcoming mediation.	0.1	375		37.5
Syann Cadogan	7/11/24	(PCD 0.1) Receipt and review of email correspondence from case staffer regarding draft of Case Management Conference statement from July 30, 2024 conference.	0.1	375		37.5
Syann Cadogan	7/11/24	(PCD 0.1) Receipt and review of email correspondence from case staffer regarding Joint Case Management Conference Statement and update post-mediation.	0.1	375		37.5
Syann Cadogan	7/17/24	(PCD 0.1) Receipt and review of email correspondence regarding results of mediation. Action for Paralegal SBC to organize closed case checklist.	0.1	375		37.5
Syann Cadogan	7/22/24	(PCD 0.1) Receipt and review of email correspondence from Client regarding false Claims made by California Hydronics, employee turnover, and settlement offer.	0.1	375		37.5
Syann Cadogan	8/12/24	(PCD 0.1) Receipt and review of email correspondence from Client regarding status of case close timeline and payments.	0.1	400		40
Syann Cadogan	8/20/24	(PCD 0.1) Receipt and review of email correspondence from Client regarding judge's approval of settlement and award to Client.	0.1	400		40
Syann Cadogan	11/5/24	Review register of action and add Case Management Conference and Motion for Preliminary Approval Of Settlement to calendar.	0.1	400	\$40.00	
Syann Cadogan	12/4/24	(PCD 0.1) Receipt and review of email correspondence from Court regarding tentative ruling fro Case Management Conference. Receipt and organization of tentative ruling from Court website. Draft internal memo to case staffers regarding the same.	0.2	400	\$40.00	40
Syann Cadogan	1/16/25	(PCD 0.1) Receipt and review of email correspondence regarding signed settlement agreement.	0.1	440		44
Syann Cadogan	1/27/25	(PCD 0.1) Receipt and review of email correspondence from Opposing Counsel regarding fully executed Class Action and PAGA Settlement Agreement.	0.1	440		44
Syann Cadogan	3/5/25	(PCD 0.1) Receipt and review of email correspondence from Client regarding concerns with class settlement timeline.	0.1	440		44
Syann Cadogan	3/27/25	(PCD 0.1) Receipt and review of email correspondence regarding granted Motion for Preliminary Approval of Settlement and acton to organize firms billing.	0.1	440		44
Syann Cadogan	3/31/25	(PCD 0.1) Receipt and review of email correspondence regarding Courts granting of Motion and preliminary approval of settlement.	0.1	440		44
Syann Cadogan	4/2/25	(PCD 0.1) Receipt and review of email correspondence from Phoenix Class Action regarding settlement for matter.	0.1	440		44
Syann Cadogan	4/7/25	(PCD 0.1) Receipt and review of email correspondence from Court regarding order on Motion for Preliminary approval. Review order.	0.1	440		44
Syann Cadogan	4/9/25	(PCD 0.1) Receipt and review of email correspondence from Phoenix Group regarding administration timeline based on approval date.	0.1	440		44
Syann Cadogan	4/15/25	(PCD 0.1) Receipt and review of email correspondence from insurer regarding receipt of class data.	0.1	440		44
Syann Cadogan	4/19/25	(PCD 0.2) Receipt and review of email correspondence from Phoenix Class regarding preliminary calculations and mailing documents for class members. Review calculations nad associated documents.	0.2	440		88
Syann Cadogan	4/21/25	(PCD 0.2) Receipt and review of multiple email correspondence regarding Client's administrator bonus and monies related thereto.	0.2	440		88
Syann Cadogan	4/23/25	(PCD 0.1) Receipt and review of multiple email correspondence from Counsel regarding updated class notice and approval thereof.	0.1	440		44
Syann Cadogan	4/25/25	Receipt and organization of Class Notice Packet. Save to Client file. Draft internal memo to case staffers regarding the same.	0.1	440	440	
Syann Cadogan	4/28/25	(PCD 0.1) Receipt and review of email correspondence from Phoenix Group regarding initial mailing of class notice.	0.1	440		44
Syann Cadogan	5/12/25	(PCD 0.1) Receipt and review of email correspondence from Phoenix Class Group regarding weekly report. Review report.	0.1	440		44
Syann Cadogan	5/23/25	(PCD 0.1) Receipt and review of email correspondence from Client regarding appreciation for work on case.	0.1	440		44
Syann Cadogan	6/3/25	(PCD 0.1) Receipt and review of email correspondence from Phoenix Class Actions regarding weekly report for class notices. Review report.	0.1	440		44
Syann Cadogan	6/9/25	(PCD 0.1) Receipt and review of email correspondence from Class Admin regarding weekly report for mailed class notices. Review report.	0.1	440		44
Kelley Kilgore	6/10/25	Receipt and organization of Notice of Address Change - Defendant, save to client file, and draft of internal memo regarding the same.	0.2	215		43
Lenden Webb	6/10/25	Office conference between Attorney LFW and Senior Paralegal SBC regarding receipt of Notice of Change of address and revisions to proof of service.	0.1	1080		108
Syann Cadogan	6/10/25	(PCD 0.1) Office conference between Attorney LFW and Senior Paralegal SBC regarding receipt of Notice of Change of address and revisions to proof of service.	0.1	440		47.5
Syann Cadogan	6/11/25	(PCD 0.1) Receipt and review of email correspondence from Opposing Counsel regarding Notice of Change of address.	0.1	440		47.5
Syann Cadogan	6/16/25	(PCD 0.1) Receipt and review of email correspondence from Class Admin regarding weekly report and notices received class.	0.1	440		47.5
Syann Cadogan	6/23/25	(PCD 0.1) Receipt and review of email correspondence from Phoenix Class Administration regarding opt out deadline and weekly report.	0.1	440		47.5
Syann Cadogan	7/1/25	(PCD 0.1) Receipt and review of email correspondence from Client regarding status of opt outs. Receipt and review of email correspondence from Co-Counsel regarding the same.	0.1	475		47.5
Syann Cadogan	7/3/25	(PCD 0.1) Receipt and review of email correspondence from Class Administrator regarding weekly report for class notices.	0.1	475		47.5
Karla Roman	7/7/25	Cross-calendar action to review tentative ruling for hearing on August 28, 2025.	0.1	240		240
Lenden Webb	7/12/25	Draft internal memo to file regarding next steps for case and draft of approval motion.	0.1	1080		108
Syann Cadogan	7/14/25	(PCD 0.1) Receipt and review of email correspondence from Class Administrator regarding weekly report.	0.1	475		47.5
Lenden Webb	7/30/25	Receipt and review of Motion for Final Approval - Declaration from Phoenix Settlement Agreement. Draft of email correspondence to Co-Counsel regarding completed review of Motion and	0.1	1080		108
Axel Chilaca	8/1/25	(PCD 0.1) Receipt and review internal memo from Attorney LFW regarding action to forward sample declaration in support of motion for final approval of class settlement.	0.1	335		33.5
			132	TOTAL FEE	\$63,105.90	

Type Date Description

Billable (\$)

ExpenseEntry	11/8/23 One Legal filing fee for Notice of Association of Counsel in Alameda County. 21598229.	19.15
ExpenseEntry	1/23/24 One Legal filing fee for Case Management Statement. 22070098.	21
ExpenseEntry	2/8/24 Lyft charge associated with traveling from Oakland Airport to Opposing Counsel's office in Walnut Creek for deposition of plaintiff.	62.09
ExpenseEntry	2/8/24 Lyft expense to travel from Opposing Counsel's office in Walnut Creek to Airport in Oakland to travel back from Client's deposition.	61.7
ExpenseEntry	3/12/24 Simplus fee for Notice. 24032-P	200
ExpenseEntry	4/22/24 One Legal filing fee for Notice of Change of Handling Attorney and Notice of Association per rejection from Court Clerk. 22728810	21
ExpenseEntry	4/19/24 One Legal filing fee for Notice of Change of Handling Attorney. 22701382.	13.85
ExpenseEntry	6/12/24 Judicate West mediation fee, Webb Law Group portion. (Invoice 632148)	4187.5
<u>TOTAL COSTS</u>		4586.29

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.

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Sarah E. Lucas (SBN 148713)
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JACUZZI PC**
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**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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