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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 BROOKE B.
NEVELS IN SUPPORT OF MOTION AND
MOTION FOR FINAL APPROVAL OF
CLASS AND PAGA SETTLEMENT**

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

Date: August 28, 2025

Time: 10:00 a.m.

Dept: 23

I BROOKE B. NEVELS, hereby state and declare as follows:

1. I am the Managing Partner of Nevels Nichols, LLP and counsel for Plaintiff Alexander Brick ("Plaintiff") 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. I have personal knowledge of all the facts stated herein. I could and would competently testify under oath to these facts in court if requested to do so.

3. This declaration is being submitted in support of the motion for final approval of the proposed class action settlement with Defendant CALIFORNIA HYDRONICS CORPORATION ("Defendant"), and seeks an entry of an order for:

**DECLARATION OF BROOKE B. NEVELS IN SUPPORT OF MOTION AND
MOTION FOR FINAL APPROVAL OF CLASS AND PAGA SETTLEMENT**

- 1 (i) approving the proposed settlement of this class and PAGA action with Defendant;
2 (ii) for settlement purposes only, conditionally certifying the class;
3 (iii) appointing Plaintiff ALEXANDER BRICK as the Class Representative;
4 (iv) appointing Lenden F. Webb, of WEBB LAW GROUP, APC, Norman B. Blumenthal,
5 Kyle R. Nordrehaug, and Aparajit Bhowmik of BLUMENTHAL NORDREHAUG
6 BHOWMIK DE BLOUW LLP, and Brooke B. Nevels and Christopher E. Nichols of
7 NEVELS NICHOLS, LLP, as Class Counsel for the Class;
8 (v) approving the form and method for providing notice to the class and aggrieved
9 employees;
10 (vi) directing that notice of the proposed settlement be given to the class and aggrieved
11 employees;
12 (vii) appointing Phoenix Settlement Administrators as the Settlement Administrator;

13 **BACKGROUND AND EXPERIENCE OF DECLARANT AND FIRM**

- 14 4. My partner, Christopher E. Nichols, and I began working on this matter in November
15 2023 while at Webb Law Group, which had then associated into the case. During our
16 tenure there through April 2024, we oversaw discovery, became deeply familiar with
17 the legal and factual issues, and managed the *Belaire-West* notice process that allowed
18 Class Counsel to obtain contact information for Class Members.
- 19 5. In April 2024, we established our own firm, Nevels Nichols LLP, and continued to
20 represent the Class in this litigation.
- 21 6. Both Mr. Nichols and I have extensive experience litigating employment matters under
22 the California Labor Code, including class and PAGA actions. Collectively, we have
23 represented hundreds of employees in wage and hour matters and have successfully
24 obtained numerous PAGA settlements approved by courts throughout California.
- 25 7. We have served as appointed Class Counsel in several wage and hour class actions,
26 including *Brown v. ESA Management*, San Joaquin Superior Court Case No. STK-CV-
27 UOE-2019-7162; *Lawrenz v. BlackTalon*, Sacramento County Superior Court Case No.
28 34-2019-00267748; and *Malinoff v. Ron Du Pratt Ford, Inc.*, Solano County Superior

1 Court Case No. FCS053263. We are currently prosecuting numerous other class actions
2 in which we are pursuing certification and recovery on behalf of California employees.

- 3 8. In addition to our work representing plaintiffs, we have also defended employers in
4 wage and hour class actions and PAGA cases. This dual experience provides us with a
5 balanced understanding of litigation risks, case valuation, and negotiation strategy, all
6 of which we leveraged to obtain the best possible result for the Class in this case.
- 7 9. Our firm has no relationship with the Defendant and no conflicts of interest that would
8 preclude our appointment as Class Counsel. The settlement was reached through arm's-
9 length negotiations, and our sole interest is in securing meaningful relief for the Class
10 Members. Given our qualifications, experience, and independence, we believe
11 appointment as Class Counsel is appropriate.

12 **PROCEDURAL AND LITIGATION HISTORY**

- 13 10. On April 17, 2024, my firm, Nevels Nichols LLP, filed a Notice of Association of
14 Counsel and thereafter assumed an active role in preparing the case for mediation.
- 15 11. On July 16, 2024, during the second mediation session before experienced mediator
16 Michael D. Young, our firm played an instrumental role in coordinating and conducting
17 the mediation. We guided the parties through productive and extensive negotiations
18 during the full-day session, which ultimately resulted in agreement on the material
19 terms of settlement.
- 20 12. The Settlement Agreement was finalized and executed in January 2025. Although the
21 Agreement initially estimated a Class size of 112 individuals, further analysis
22 determined that the final Class consisted of 118 members.
- 23 13. On March 20, 2025, the Court granted Plaintiff's Motion for Preliminary Approval of
24 the Class Settlement, finding that "the terms of the settlement and notice procedures
25 appear generally fair, reasonable, and adequate." (Order Granting Preliminary Approval
26 at p. 2.)

1 14. Following the Preliminary Approval Order, the Court-approved Class Notice was
2 disseminated to the Class on April 25, 2025. As of the date of this filing, there have
3 been no objections or opt-outs received, indicating strong support for the Settlement.

4 **TERMS OF THE SETTLEMENT AND ALLOCATION**

5 15. On January 14, 2025, my office, along with co-counsel, reached a settlement in
6 principle with Defendant following extensive arm's-length negotiations. The material
7 terms were formalized in the written Settlement Agreement, filed concurrently with the
8 Motion for Final Approval. The Settlement provides for a non-reversionary Gross
9 Settlement Amount of \$280,000. (Settlement Agreement ¶ 3.1.) This amount fully
10 resolves all claims asserted by the Settlement Class and includes all payments for
11 Individual Class Payments, PAGA penalties, a Class Representative Enhancement,
12 attorneys' fees and litigation costs, and administration expenses. Defendant's employer-
13 side payroll taxes are excluded from the Gross Settlement and will be paid separately.

14 16. After deducting the requested amounts for attorneys' fees (\$93,324), litigation costs
15 (\$35,000), settlement administration (\$6,500), the PAGA allocation (\$28,000), and the
16 Class Representative's enhancement payment (\$7,500), the Net Settlement Amount
17 available for distribution to Class Members is estimated to be \$109,676. (Settlement
18 Agreement ¶ 3.2.4.) This Net Settlement Amount will be distributed on a pro-rata basis
19 based on each Class Member's total number of workweeks during the Class Period.

20 17. The \$28,000 allocated to the PAGA claim will be divided pursuant to Labor Code §
21 2699(i), with \$21,000 (75%) to be paid to the California Labor and Workforce
22 Development Agency ("LWDA") and \$7,000 (25%) distributed among Aggrieved
23 Employees. PAGA payments are calculated based on pay periods worked during the
24 PAGA Period, which runs from June 9, 2021, through February 28, 2025. (Settlement
25 Agreement ¶ 1.32.)

26 18. Settlement Class Members will have 180 days from the date of mailing to cash their
27 settlement checks. Any uncashed checks will be voided, and the unclaimed funds will
28 be transmitted to Bay Area Legal Aid in accordance with California Code of Civil

Procedure § 384(b), thereby ensuring no residual funds remain. (Settlement Agreement ¶ 4.3.3.)

SETTLEMENT ADMINISTRATION AND CLASS NOTICE

19. Nevels Nichols LLP obtained bids from three qualified settlement administrators: CPT Group (\$8,500), Simpluris (\$6,750, discounted to \$6,500), and Phoenix Settlement Administrators, which submitted the lowest bid with a not-to-exceed cost of \$6,250.

Based on the competitive pricing and qualifications, we selected Phoenix Settlement Administrators to serve as the Settlement Administrator. Their credentials are detailed in the Declaration of Jodey Lawrence, submitted concurrently with this Motion.

20. Pursuant to the Settlement Agreement (¶ 7.1), Phoenix Settlement Administrators was tasked with disseminating the Court-approved Class Notice, processing opt-outs and disputes and calculating and distributing settlement payments. The total cost of administration will not exceed \$6,500.

21. On April 25, 2025, the Administrator mailed the Class Notice via first-class mail to all Class Members using address data verified through the National Change of Address database. The Notice contained details regarding the terms of the Settlement, each Class Member's estimated payment, and information about attorneys' fees, costs, and the Class Representative's requested enhancement. Class Members were given 60 days to dispute the number of workweeks credited or to request exclusion, with an additional 14 days for those receiving re-mailed notices. (Settlement Agreement ¶¶ 7.5.1, 7.6.) As of the date of this Declaration, no Class Members have objected to or opted out of the Settlement.

22. In my experience, the absence of any objections or exclusions in a wage and hour class action supports a conclusion that the Settlement is fair, reasonable, and adequate.

LWDA NOTIFICATION AND PAGA ALLOCATION

23. As required by California Labor Code § 2699(1)(2), a copy of the settlement and this Motion for Final Approval, including all supporting documents and the executed Settlement Agreement, was served on the California Labor & Workforce Development

Agency (“LWDA”). A proof of service confirming this contemporaneous submission is included with this filing.

24. The Settlement allocates \$28,000 to resolve claims under the Private Attorneys General Act (“PAGA”), of which 75% (\$21,000) will be paid to the LWDA and 25% (\$7,000) will be distributed to Aggrieved Employees based on pay periods worked during the PAGA period, regardless of whether they opted out of the class. (Settlement Agreement ¶ 1.32.)

25. The allocation of approximately 10% of the total \$280,000 Gross Settlement Amount to PAGA claims is consistent with allocations approved in other wage and hour settlements across the state. Courts have regularly approved PAGA allocations ranging from 0.13% to 10% of the total settlement value. See *Davis v. Brown Shoe Co.*, U.S. Dist. LEXIS 149010 (E.D. Cal. 2015) (PAGA Payment of \$5,000 in a \$1.5 million class settlement); *Zamora v. Ryder Integrated Logistics, Inc.*, U.S. Dist. LEXIS 184096 (S.D. Cal. 2014) (PAGA Payment of \$7,500 in a \$1.5 million class settlement); and *Chu v. Wells Fargo Investments, LLC*, WL 672645 (N.D. Cal. 2011) (PAGA Payment of \$7,500 in a \$6.9 million common-fund settlement). As a result, the \$28,000 allocation here to PAGA penalties is in line with what other Courts have approved in the past.

26. As discussed in *O’Connor v. Uber Technologies, Inc.*, 201 F. Supp. 3d 1110, 1133 (N.D. Cal. 2016), the LWDA recognizes that the value of PAGA claims in a settlement need not directly mirror the percentage recovery on class claims and that courts should review the overall fairness, reasonableness, and adequacy of the settlement with primary consideration to the interests of absent class members. The allocation here is well within the range of reasonableness and serves the intended purposes of PAGA.

DAMAGES ANALYSIS AND ESTIMATED EXPOSURE

27. My firm retained Berger Consulting Group to conduct a class-wide damages analysis based on time and wage data produced by Defendant. The analysis assumed that Class Members collectively worked 10,203 workweeks during the relevant period.

28. Based on that data, Berger Consulting calculated potential damages for each of the alleged claims:

- **Rounding Violations:** 349 improperly rounded hours resulted in \$21,248 in unpaid wages, or approximately \$180.06 per Class Member.
- **Overtime Underpayments:** Estimated at \$7,730, averaging \$65.50 per Class Member.
- **Off-the-Clock Work:** Including pre-/post-shift tasks, interrupted meal breaks, and COVID-19 screenings, estimated at \$448,438, or \$3,800.32 per Class Member.
- **Meal Period Premiums:** Gross exposure of \$219,943, reduced to \$104,554 after crediting \$115,389 already paid, resulting in \$1,863.92 per Class Member.
- **Rest Period Premiums:** Estimated at \$345,856, or \$2,930.98 per Class Member.
- **Expense Reimbursements:** Valued at \$11,640, averaging \$98.64 per Class Member.
- **Waiting Time Penalties (Lab. Code. § 203):** \$326,301, or \$2,765.26 per Class Member.
- **Wage Statement Penalties (Lab. Code § 226):** \$182,700, or \$1,548.30 per Class Member.

29. The total estimated exposure for these wage and hour claims is \$1,572,724, equating to approximately \$154.14 per workweek. This figure excludes separate PAGA penalties, which were independently estimated at \$1,363,850.

30. The \$280,000 non-reversionary Gross Settlement Amount represents roughly 17.8% of the estimated maximum value of these claims. In light of the risks of class certification, liability determinations, and evidentiary challenges at trial, I believe the recovery of an average of \$929.46 per Class Member is fair, reasonable, and adequate under the circumstances.

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34. Defendant also asserted that less than 20 employees received additional compensation requiring regular rate recalculations and claimed any shortfalls had already been corrected, further weakening the value of Plaintiffs' regular rate claim. Similarly, while there was evidence of facially non-compliant meal periods, Defendant had a robust reporting and premium payment system in place. Many employees, including the Class Representative, utilized this system and were paid corresponding premiums, posing considerable challenges to both certification and liability on these claims.

1 35. Discovery also revealed that Defendant reimbursed employees for expenses, and the
2 Class Representative testified to receiving reimbursements. These facts further
3 diminished the strength and value of Plaintiffs' business expense claims.

4 36. Regarding the PAGA penalties, Defendant would likely argue that stacking of penalties
5 is impermissible, significantly limiting exposure. Courts also routinely reduce PAGA
6 penalties well below the statutory maximum. For example, in *Carrington v. Starbucks*
7 *Corp.* (2018) 30 Cal. App. 5th 504, the court approved a PAGA award of only \$5 per
8 violation. Additionally, Defendant's history of paying meal premiums may be viewed
9 by the Court as a mitigating factor, justifying a further reduction in penalties.

10 37. From a procedural standpoint, the primary litigation risk was class certification.
11 Defendant argued that individual inquiries into injury and good faith would defeat
12 certification, and several California appellate decisions, including *Cacho v. Eurostar,*
13 *Inc.* (2019) 43 Cal. App. 5th 885, support this view. Even if certification were obtained,
14 the California Supreme Court in *Duran v. U.S. Bank Nat'l Assn.* (2014) 59 Cal. 4th 1,
15 emphasized the significant evidentiary burdens of achieving class-wide recovery. In my
16 opinion, certification in this matter was far from certain.

17 38. As of the time of settlement, Defendant estimated there were 118 Class Members who
18 collectively worked 10,203 workweeks during the Class Period, and 69 Aggrieved
19 Employees who worked 1,962 pay periods during the PAGA Period. Based on the
20 \$280,000 Gross Settlement Amount, each workweek is valued at \$27.44. After
21 deductions, the Net Settlement Amount translates to approximately \$10.74 per
22 workweek, or an average payment of \$978.39 per Class Member.

23 39. In light of the challenges outlined above, including risks on the merits, certification,
24 PAGA penalties, and appellate review, Class Counsel believes this Settlement
25 represents a fair and meaningful recovery for the Class. It balances the value of the
26 claims against the costs, delays, and uncertainty of continued litigation. The structure
27 ensures proportional allocation based on workweeks, avoids reversion, and maximizes
28 participation.

1 40. Based on our experience and case evaluation, we firmly believe the Settlement is in the
2 best interest of the Class and provides a substantial and fair resolution of their claims.

3 **FAIRNESS AND ADEQUACY OF THE SETTLEMENT**

4 41. The Settlement in this case was the result of contested, arm's-length negotiations
5 following a thorough investigation and evaluation of the claims. Prior to mediation,
6 Defendant produced detailed class member data, including time and payroll records. My
7 office reviewed and analyzed this data to assess potential liability and class-wide
8 damages exposure.

9 42. In preparation for mediation, Plaintiffs drafted and submitted a comprehensive
10 mediation brief that addressed the legal and factual bases for liability, class certification,
11 damages calculations, and applicable defenses.

12 43. On July 16, 2024, the Parties participated in a full-day mediation session with Michael
13 D. Young, an experienced employment law mediator. The Parties reached an agreement
14 on the material terms of settlement through extensive arm's-length negotiations.

15 44. Following the mediation, the Parties worked cooperatively over the next five months to
16 draft and finalize the long-form Settlement Agreement, which was executed on January
17 14, 2025, and subsequently submitted to the Court in support of Preliminary Approval.

18 45. Throughout the litigation and settlement negotiations, Defendant consistently denied
19 liability. However, Class Counsel, after evaluating the strengths and weaknesses of the
20 claims and defenses, the risk and expense of continued litigation, and the benefits of
21 early resolution, determined that the Settlement was in the best interest of the Class.

22 46. Based on my experience litigating, certifying, and resolving wage and hour class actions
23 in both state and federal court, I believe this outcome is fair and reasonable. Our legal
24 team was well-qualified to assess legal risks, factual uncertainties, and exposure, and to
25 negotiate a result that provides meaningful relief to Class Members.

26 47. The Settlement was reached only after sufficient investigation and discovery to allow an
27 informed evaluation of the claims. The process involved comprehensive factual and
28

1 legal analysis, participation in formal mediation, and collaborative post-mediation
2 efforts to finalize the agreement.

3 48. The \$280,000 Gross Settlement Amount represents a fair and reasonable compromise,
4 particularly in light of the litigation risks, the difficulty of obtaining and maintaining
5 class certification, and the uncertainties of trial. At the time of settlement, the Parties
6 faced genuine disputes concerning liability, damages, and class manageability.

7 49. As of the date of this Declaration, no Class Member has objected to any aspect of the
8 Settlement, including the requested fees, costs, or service award. This lack of objections
9 following proper notice supports the conclusion that the Class has responded favorably
10 to the Settlement.

11 50. In my professional opinion, the Settlement falls well within the range of reasonableness
12 under California law and represents a fair, adequate, and reasonable resolution of a
13 contested matter.

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

15 51. Plaintiffs intend to apply to the Court for a Representative Service Payment in the
16 amount of \$7,500 in recognition of their time, efforts, and the risks they undertook in
17 pursuing this litigation on behalf of the Class. Plaintiff Alexander Brick fulfilled his
18 responsibilities diligently by actively assisting Class Counsel, including by providing
19 documentation and witness contact information that proved instrumental in the
20 negotiation and attainment of the Settlement. Based on our evaluation, we believe that
21 the settlement amount achieved would not have been possible without Plaintiff Brick's
22 substantial contributions.

23 52. In this action, Plaintiff Brick meaningfully participated in discovery, including sitting
24 for a deposition. He consistently made himself available to assist Class Counsel
25 throughout the litigation and was prepared to participate in the mediation process, if
26 necessary. Plaintiff Brick's efforts and involvement in the case are further detailed in
27 his Declaration submitted in support of the Motion for Preliminary Approval. Attached
28 hereto as **Exhibit "1"** is a true and correct copy of Plaintiff Brick Declaration.

1 **ATTORNEY’S FEES: JUSTIFICATION, EFFORTS, AND RESULTS**

2 53. From the beginning of this litigation, Class Counsel recognized the significant risks
3 involved. The claims alleging off-the-clock work, unlawful rounding, and failure to pay
4 meal and rest period premiums, challenged established workplace practices. Defendant
5 vigorously defended these practices as lawful, asserting both factual and legal defenses
6 to liability and class certification that posed a substantial risk to Plaintiffs’ ability to
7 achieve any recovery on a class-wide basis.

8 54. Nevels Nichols LLP undertook representation of Plaintiff and the Class on a fully
9 contingent basis, assuming the very real possibility of receiving no compensation or
10 cost reimbursement. As a small firm with limited capacity, we made a substantial
11 commitment of time and resources to this matter, foregoing hourly-paying work to
12 represent low-wage workers in high-risk litigation. The risk of non-recovery,
13 particularly if class certification were denied or liability not established at trial, was
14 significant and ever-present.

15 55. Over the course of the litigation, our firm devoted substantial effort to the case,
16 including conducting discovery, analyzing complex damages data, participating in two
17 mediation sessions, interviewing Class Members, reviewing time and payroll records,
18 and engaging in intensive settlement negotiations. These tasks required legal
19 sophistication and extensive hours of attorney time, all undertaken in the face of
20 considerable litigation uncertainty.

21 56. The claims involved a web of interrelated liability theories, each subject to robust
22 defenses and individualized factual questions. Among the challenges were whether
23 rounding practices negatively impacted employees, whether meal and rest periods were
24 actually missed or simply misrecorded, and whether business expenses had been
25 adequately reimbursed. Developing a cohesive class-wide liability theory under these
26 circumstances required careful legal strategy and factual development.

1 57. Despite these hurdles, Class Counsel secured a \$280,000 Gross Settlement Amount,
2 delivering a meaningful monetary recovery to Class Members. The result reflects both
3 our firm's litigation skill and dedication to advancing the interests of the Class.

4 58. Given the complexity of the litigation, the contingent nature of the representation, and
5 the favorable result achieved, the requested attorneys' fees, equal to one-third of the
6 Gross Settlement Amount, are fair and reasonable. This amount aligns with prevailing
7 market rates and is consistent with fee awards in comparable wage and hour class
8 actions.

9 **CLASS COUNSEL'S LODESTAR AND MULTIPLIER**

10 59. Class Counsel's request for attorneys' fees in the amount of \$93,324.00, representing
11 thirty-three and one-third percent (33.33%) of the Gross Settlement Amount, is further
12 supported by their lodestar. As of August 4, 2025, my firm has spent 123.4 hours on this
13 matter for a total amount of of \$78,725.00 with additional fees still to be incurred to
14 complete the approval and settlement process. As detailed in my co-counsel Lenden
15 Webb's declaration, Webb Law Group spent 132 hours total \$63,105.90 in work across
16 the various staffers billing rates his firm. My co-counsel describes in detail in the
17 Declaration of Kyle Nordrehaug that the Blumenthal firm has spent a total of 92.7 hours
18 on this matter for a cumulative total of \$74,549.44 in fees incurred. Thus **the lodestar**
19 **in this matter that all of our firms incurred is \$216,380.34** in fees on this matter.

20 Attached hereto as **Exhibit "2"** is a true and correct copy of Nevel Nichols LLP billing
21 summary.

22 60. This lodestar includes time devoted to factual investigation, Class Member interviews,
23 analysis of time and payroll data, motion practice, mediation preparation and
24 attendance, drafting the settlement agreement, coordinating with the Settlement
25 Administrator, and preparing materials for both Preliminary and Final Approval
26 proceedings.

27 61. Attorneys and staff at Nevels Nichols LLP billed at hourly rates ranging from \$175 to
28 \$775, based on experience and role. Comparable rates were applied by the Webb Law

1 Group and the Law Offices of Kyle Nordrehaug, all of whom have significant
2 experience in class action and complex employment litigation. These rates fall within
3 the range typically approved by California state and federal courts in similar matters.

4 62. Additional time will be required following Final Approval for coordinating settlement
5 administration, handling Class Member inquiries, overseeing the distribution of funds,
6 and preparing final compliance filings.

7 63. The legal work was performed efficiently and resulted in a favorable class-wide
8 resolution in a case presenting complex factual issues and significant litigation risks.
9 The requested fee is in line with or below multipliers commonly approved in similar
10 wage and hour class actions under California law.

11 64. Firm-specific billing summaries, including hours worked and applicable rates, are set
12 forth in the declarations submitted by Lenden F. Webb, Kyle Nordrehaug, and myself.
13 The total lodestar for Plaintiffs Counsel in this matter is **\$216,380.34** This amount
14 compared to the total amount of requested attorney's fees, which is \$93,324, equates to
15 a multiplier of only .43, which is well in line with the acceptable standards and is
16 routinely granted by Courts in California.

17 **CLASS COUNSEL'S COSTS**

18 65. Class Counsel has incurred a total of **\$26,308.03 in hard costs** in this matter.

19 Specifically, Webb Law Group, APC has a total of \$4,585.29 in hard costs for this
20 matter. These costs are described in detail in the Declaration of Lenden Webb which is
21 being filed concurrently along with this motion. Blumenthal Nordrehaug Bhowmik De
22 Blouw LLP has a total of \$16,859.44 in hard costs for this matter. These costs are
23 described in detail in the Declaration of Kyle Nordrehaug which is being filed
24 concurrently along with this motion. My firm, Nevels Nichols LLP has a total of
25 \$4,863.30 in hard costs for this matter. A true and correct copy of Nevels Nichols LLP's
26 billing summary is attached hereto as **Exhibit "2."**

27 66. Therefore, the actual total of costs incurred by my firm, as well as by my co-counsel,
28 the Blumenthal firm and Webb Law Group is \$26,308.03, thus out of the \$35,000

1 allotted for hard costs and expense reimbursements, we cumulatively seek only
2 \$26,308.03, meaning that the remainder will be returned to be distributed among the
3 Class Members.
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5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct. Executed on August 4, 2025, at San Diego, California.
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8 
9 BROOKE B. NEVELS

EXHIBIT 1

Brooke B. Nevels (SBN 302994)
Christopher E. Nichols (SBN 316417)
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Attorneys for Plaintiff

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,

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CALIFORNIA HYDRONICS
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Defendants.

CASE NO. 22CV018191

**DECLARATION OF ALEXANDER
BRICK IN SUPPORT OF MOTION AND
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
SETTLEMENT**

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

Date: February 27, 2025
Time: 10:00 a.m.
Dept: 23

I ALEXANDER BRICK, hereby state and declare as follows:

1. I am over the age of eighteen, a Plaintiff in both my capacity as an individual, and on behalf of the State of California as a private attorney general. I submit this declaration in support of the Motion for Preliminary Approval of Class Settlement, and in support of my application for a representative enhancement award.

2. I have personal knowledge of all the facts stated herein. I could and would competently testify under oath to these facts in court if requested to do so.

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**DECLARATION OF ALEXANDER BRICK IN SUPPORT OF MOTION AND
MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**

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MY EMPLOYMENT

3. I worked for Defendant California Hydronics Corporation (“California Hydronics”) in California from in or around May of 2019 to April of 2022. During my employment with California Hydronics, I was classified as a non-exempt employee.

4. During my employment with California Hydronics, I experienced multiple wage & hour issues. While I was working with California Hydronics, the time that was tracked for me was rounded, which I believe resulted in me losing pay for hours that I had worked. Additionally, I sold products which entitled me to a bonus, but that earned non-discretionary compensation was not then factored into my regular rate, meaning that I was shorted on the amount of overtime pay I should have received as well. I also experienced other issues with bonus payouts, as well as issues with meal and rest breaks and reimbursements. My belief was that these issues also impacted other employees.

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MY ROLE IN THE LITIGATION

5. Because of the issues explained above, I retained the law firms of Blumenthal Nordrehaug Bhowmik De Blouw LLP and later Webb Law Group, APC, and Nevels Nichols, LLP, which are all law firms that are experienced in both class action litigation and claims against employers for violations of the California Labor Code. I have no personal relationship or family ties to my attorneys or any officer of the Court. I am not involved in any litigation against another member of the class in this case and my attorneys are not working on my behalf in another capacity other than representing me in this lawsuit.

6. I decided to file this lawsuit for the benefit of myself and other current and former non-exempt employees who worked for California Hydronics and be a Representative because I felt that my legal rights as an employee and the rights of others like me had been violated. For example, I feel that California Hydronics violated my right to be paid all wages that were due to me for all hours worked and for the correct rates.

7. This case was filed on April 15, 2022. This lawsuit exists because I reached out to counsel to seek legal assistance related to employment with California Hydronics. My attorneys have explained to me that my case has a Private Attorney’s General Act (“PAGA”) component to it,

1 which is based off a PAGA letter sent on my behalf. Thus, I am a PAGA representative and the
2 PAGA claim here exists because of my involvement. Prior to the complaint being filed I spoke
3 with my attorneys regarding the company policies and procedures at California Hydronics. I also
4 assisted my attorneys in their investigation into my claims by providing them documents and
5 answering their questions. I would also contact my attorneys from time to time if I had any
6 questions about the case. My attorneys were regularly available when I contacted them, and we
7 had numerous discussions about the case.

8 8. I understood that being a Plaintiff in a representative capacity in this case meant that I
9 was seeking damages and/or penalties not only for myself but also other current and/or former
10 employees who worked for California Hydronics in California. I felt that this group of current
11 and former employees were not aware of their labor rights, and even if they were would probably
12 be apprehensive about speaking up or even simply because of the time, effort, and risk involved
13 in filing a class action lawsuit.

14 9. During the lawsuit I stayed in touch with my attorneys by phone and email. I and provided
15 my attorneys with the necessary documents and responses that they requested to be able to
16 respond to the discovery requests on January 15, 2024, and I had to verify these discovery
17 responses as well. Not only did I assist with responding to discovery, but I also helped my
18 attorneys by providing them information for the discovery requests to be sent to California
19 Hydronics. I was also deposed in this lawsuit on January 24, 2024. I had to meet with my attorney
20 to prepare for the deposition, as well as take time off work and commute from the Sacramento
21 area to Defendant's counsel's office in Walnut Creek. I expended a significant amount of time
22 on discovery related matters in this case.

23 10. I made myself available during the mediation on July 16, 2025, with Michael Young
24 where the Parties agreed to settle the action. I spoke with my attorneys regarding the terms of the
25 Settlement, which was reached between the Parties, and understood that I was representing absent
26 aggrieved employees, and therefore wanted the best possible result to be obtained for the class,
27 and I believe a very positive result was in fact achieved via Settlement. I reviewed and signed
28

**DECLARATION OF ALEXANDER BRICK IN SUPPORT OF MOTION AND
MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**

1 the MOU for Settlement which I signed on August 19, 2024. Subsequently, I reviewed and signed
2 the long form Settlement Agreement on January 7, 2025.

3 11. I have been involved in this representative lawsuit performing the duties described above.
4 I was in contact with my attorneys and spent significant hours participating in discovery. While
5 I did not keep an exact time sheet of hours work, I estimate that I spent sixty (60) to eighty (80)
6 hours working on this case. My understanding is that future tasks may require additional hours
7 of my time. I believe I have been diligent and have done what is expected of a named Plaintiff in
8 a representative action to date and will continue to do so. I have and always will maintain the
9 best interest of the class.

10 12. In light of all the time and effort I have spent on this case, the risk I undertook suing a
11 former employer, the reputational risk that future employers may hold this lawsuit against me,
12 the general release, and in light of the size of the Settlement, I believe the request for ten thousand
13 dollars (\$7,500.00) as a representative service payment is fair and reasonable.

14
15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed on 01 / 27 / 2025, at Alex Brick,
17 California.

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21 ALEXANDER BRICK
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EXHIBIT 2

Matter Description	Date	Type	Status	User	Description	Quantity	Price	Total
Brick v. California Hydronics	1/2/25	Hourly time entry	Unbilled	Anthony Romano	Office conference between Attorney CEN and Law Clerk AMR regarding preliminary class settlement approval.	0.2	350	70
Brick v. California Hydronics	1/24/25	Hourly time entry	Unbilled	Anthony Romano	Office conference between Attorney BBN and Law Clerk AMR regarding table of contents and authorities for motion for preliminary approval.	0.1	350	35
Brick v. California Hydronics	1/24/25	Hourly time entry	Unbilled	Anthony Romano	Exchange of internal memoranda between Attorney BBN and Law Clerk AMR regarding draft of motion for preliminary approval.	0.1	350	35
Brick v. California Hydronics	1/27/25	Hourly time entry	Unbilled	Anthony Romano	Verify status of motion for preliminary approval in anticipation of draft of tables of contents and authorities.	0.1	350	35
Brick v. California Hydronics	1/27/25	Hourly time entry	Unbilled	Anthony Romano	Draft tables of authorities and contents for memorandum of points and authorities for motion for preliminary approval of class settlement.	2	350	700
Brick v. California Hydronics	1/27/25	Hourly time entry	Unbilled	Anthony Romano	Exchange of internal memoranda between Attorney BBN and Law Clerk AMR regarding Preliminary approval formatting.	0.2	350	70
Brick v. California Hydronics	1/27/25	Hourly time entry	Unbilled	Anthony Romano	Draft internal memorandum to Attorney BBN regarding finalization of tables of authorities and contents for motion for preliminary approval.	0.1	350	35
Brick v. California Hydronics	8/4/25	Hourly time entry	Unbilled	Anthony Romano	Office conference between Attorney CEN, Law Clerk AMR and NPA regarding motion for final approval.	0.2	350	70
Brick v. California Hydronics	8/4/25	Hourly time entry	Unbilled	Anthony Romano	Office conference between Attorney CEN and Law Clerk AMR regarding action to review final approval motion.	0.1	350	35
Brick v. California Hydronics	8/4/25	Hourly time entry	Unbilled	Anthony Romano	Revise motion for final approval.	0.1	350	35
Brick v. California Hydronics	4/22/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence from Opposing Counsel regarding the case management statement. Receipt of email correspondence from Attorney CEN in response to the same. Memo to file.	0.2	775	155
Brick v. California Hydronics	4/23/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of the filed Notice of Change of Handling Attorney and Association of Counsel.	0.1	775	77.5
Brick v. California Hydronics	4/23/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of Defendant's edits to the Case Management Statement.	0.1	775	77.5
Brick v. California Hydronics	4/23/24	Hourly time entry	Unbilled	Brooke Nevells	Office conference between Attorney CEN and BBN regarding the Case Management Conference edits and revisions from Opposing Counsel Sarah. Discussion about inserted section on deposition.	0.2	775	155
Brick v. California Hydronics	4/26/24	Hourly time entry	Unbilled	Brooke Nevells	Office conference with Attorney CEN and Attorney BBN regarding receipt of sampling, and action plan moving forward regarding sampling and preparing a damage excel spreadsheet.	0.4	775	310
Brick v. California Hydronics	4/26/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email correspondence from Opposing Counsel regarding sampling of documents.	0.2	775	155
Brick v. California Hydronics	4/29/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of status email from Ms. Glaze.	0.1	775	77.5
Brick v. California Hydronics	5/2/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email exchanges with Judicate West, Attorney LFW, and Opposing Counsel regarding mediation and location for the same. Memo to file.	0.2	775	155
Brick v. California Hydronics	5/3/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email correspondence from Opposing Counsel regarding objection to mediate in Los Angeles.	0.1	775	77.5
Brick v. California Hydronics	5/3/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of Opposing Counsel's objection regarding mediation location. Receipt of email from LFW regarding agreement to mediate in Oakland. Memo to file.	0.2	775	155
Brick v. California Hydronics	5/6/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email exchanges with Opposing Counsel, Attorney LFW, and Attorney CEN, regarding location of mediation, and travel expenses to be paid by Defendants.	0.2	775	155
Brick v. California Hydronics	5/13/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of multiple email exchanges with with Co-Counsel regarding mediation costs and action plan moving forward.	0.2	775	155
Brick v. California Hydronics	5/13/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of case status update from Paralegal Priscila.	0.1	775	77.5
Brick v. California Hydronics	6/5/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email correspondence from Client regarding a public record filing. Receipt and review of email from Attorney CEN regarding the same.	0.2	775	155
Brick v. California Hydronics	6/27/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence from Judicate West regarding deadline for mediation brief.	0.1	775	77.5
Brick v. California Hydronics	7/8/24	Hourly time entry	Unbilled	Brooke Nevells	Office conference with CEN regarding upcoming mediation and action plan moving forward. Draft of email to Co-Counsel regarding attendance.	0.2	775	155
Brick v. California Hydronics	7/8/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence from Sherlene regarding attendance at mediation. Memo to file.	0.2	775	155
Brick v. California Hydronics	7/8/24	Hourly time entry	Unbilled	Brooke Nevells	Draft of email correspondence to Sharlene regarding the number of attendees at mediation.	0.1	775	77.5
Brick v. California Hydronics	7/9/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of the Mediation Brief from Defendants. Save to file.	0.3	775	232.5
Brick v. California Hydronics	7/9/24	Hourly time entry	Unbilled	Brooke Nevells	Office conference with CEN and BBN regarding Defendant's Mediation brief and action plan moving forward.	0.2	775	155
Brick v. California Hydronics	7/9/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence regarding Services Agreements and Confidentiality.	0.1	775	77.5
Brick v. California Hydronics	7/12/24	Hourly time entry	Unbilled	Brooke Nevells	Office conference between Attorney CEN and Attorney BBN regarding the mediation, case value, excel spreadsheet to itemize damages.	0.2	775	155
Brick v. California Hydronics	7/16/24	Hourly time entry	Unbilled	Brooke Nevells	Multiple office conference with CEN and BBN regarding mediation, status of the same, and settlement numbers.	2.1	775	1627.5
Brick v. California Hydronics	7/16/24	Hourly time entry	Unbilled	Brooke Nevells	Additional office conference with Attorney CEN regarding outcome of mediation and action plan moving forward.	0.2	775	155
Brick v. California Hydronics	7/17/24	Hourly time entry	Unbilled	Brooke Nevells	Office conference between Attorney BBN and Attorney CEN about mediation outcome, next steps, communication with client, and obtaining MOU from opposing counsel.	0.2	775	155
Brick v. California Hydronics	7/17/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of the Memorandum of Understanding.	0.2	775	155
Brick v. California Hydronics	7/17/24	Hourly time entry	Unbilled	Brooke Nevells	Office conference with Attorney CEN and BBN regarding outcome of call with Client regarding settlement. Further discussion regarding the MOU and edits that need to be made.	0.3	775	232.5
Brick v. California Hydronics	7/18/24	Hourly time entry	Unbilled	Brooke Nevells	Office conference between Attorney BBN and Attorney CEN about alternations to the MOU and redlines for the settlement.	0.3	775	232.5
Brick v. California Hydronics	7/19/24	Hourly time entry	Unbilled	Brooke Nevells	Draft of email to Co-Counsel regarding review of the Memorandum of Understanding.	0.1	775	77.5
Brick v. California Hydronics	7/19/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence from Co-Counsel regarding edits to the MOU. Edit the same.	0.3	775	232.5
Brick v. California Hydronics	7/22/24	Hourly time entry	Unbilled	Brooke Nevells	Draft of email correspondence to Opposing Counsel to send edits to the MOU.	0.1	775	77.5
Brick v. California Hydronics	7/22/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email correspondence from Client regarding frustrations with the settlement. Draft of lengthy rough draft email in reply regarding the settlement and risks moving forward.	0.5	775	387.5
Brick v. California Hydronics	7/22/24	Hourly time entry	Unbilled	Brooke Nevells	Telephone conference between Attorney BBN and Attorney CEN regarding Client Brick's concerns with settlement amount and his point as it relates to the bonuses and other issues that are being brought up now. Discussion regarding responsive email draft.	0.2	775	155
Brick v. California Hydronics	7/23/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of Opposing Counsel's redline to the MOU.	0.2	775	155
Brick v. California Hydronics	7/24/24	Hourly time entry	Unbilled	Brooke Nevells	Office conference between Attorney BBN and Attorney CEN about release language in settlement, acceptance of other changes.	0.2	775	155
Brick v. California Hydronics	7/24/24	Hourly time entry	Unbilled	Brooke Nevells	Review of the Joint Case Management Statement.	0.1	775	77.5
Brick v. California Hydronics	7/25/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of additional email exchanges with Co-Counsel and Opposing Counsel regarding the MOU and the release for the class.	0.2	775	155
Brick v. California Hydronics	7/25/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email correspondence from Client and response from Attorney CEN regarding settlement.	0.2	775	155
Brick v. California Hydronics	7/25/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email correspondence from Opposing Counsel regarding sample release language to include in the settlement agreement.	0.2	775	155
Brick v. California Hydronics	7/25/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of additional email exchanges with Client and Attorney CEN regarding the class action settlement.	0.2	775	155
Brick v. California Hydronics	7/30/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of the Minute Order and Continued CMC and Motion for Preliminary Approval notice of hearing.	0.1	775	77.5
Brick v. California Hydronics	8/12/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence from Client regarding update on settlement and draft email from Attorney CEN in response to the same.	0.2	775	155
Brick v. California Hydronics	8/13/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of the executed MOU.	0.1	775	77.5
Brick v. California Hydronics	8/13/24	Hourly time entry	Unbilled	Brooke Nevells	Send Co-Counsel the MOU for signature.	0.1	775	77.5
Brick v. California Hydronics	8/19/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of multiple emails from Client and Attorney CEN regarding the enhancement bonus and settlement. Memo to file.	0.2	775	155
Brick v. California Hydronics	8/19/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence regarding confirmation of the signed MOU from client.	0.1	775	77.5
Brick v. California Hydronics	8/19/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence from Opposing Counsel regarding the signed MOU from Defendant's counsel and status of Defendant's signature. Further email exchanges regarding the settlement form.	0.2	775	155
Brick v. California Hydronics	8/26/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence from Opposing Counsel regarding the fully executed Memorandum of understanding.	0.1	775	77.5
Brick v. California Hydronics	10/15/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email exchanges with Client regarding status of the case.	0.2	775	155
Brick v. California Hydronics	11/26/24	Hourly time entry	Unbilled	Brooke Nevells	Edit and review the settlement agreement.	0.5	775	387.5
Brick v. California Hydronics	12/4/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email from Court Clerk advising of the continued Case Management Conference. Memo to RAH to update the calendar.	0.2	775	155
Brick v. California Hydronics	12/5/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of the tentative ruling. Memo to RAH to calendar deadlines.	0.2	775	155
Brick v. California Hydronics	12/11/24	Hourly time entry	Unbilled	Brooke Nevells	Office conference with Legal Assistant Raha Razavi regarding obtaining Quote for class administrators CPT Group and Phoenix.	0.2	775	155
Brick v. California Hydronics	12/11/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of quote from CPT Group regarding class administration.	0.1	775	77.5

Brick v. California Hydronics	12/11/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of quote from Simpluris.	0.2	775	155
Brick v. California Hydronics	12/12/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of quote from Phoenix administration.	0.2	775	155
Brick v. California Hydronics	12/19/24	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email exchanges with Opposing Counsel regarding status of the settlement agreement.	0.1	775	77.5
Brick v. California Hydronics	12/19/24	Hourly time entry	Unbilled	Brooke Nevells	Office conference between Attorney CEN and Attorney BBN regarding admin quotes, timeline for motion for preliminary approval, and requesting that opposing counsel return the document sooner.	0.2	775	155
Brick v. California Hydronics	1/3/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email exchanges regarding status of review of the Settlement. Send to Lenden and AJ for signature.	0.3	775	232.5
Brick v. California Hydronics	1/7/25	Hourly time entry	Unbilled	Brooke Nevells	Send Client via BoxSign the Settlement Agreement for execution.	0.1	775	77.5
Brick v. California Hydronics	1/13/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence from AJ regarding status of signing the settlement agreement. Draft of email in reply regarding the same.	0.2	775	155
Brick v. California Hydronics	1/14/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of the signed Settlement Agreement from Kyle and Lenden. Add signature and compile signature pages. Email to Opposing Counsel and request for status update.	0.3	775	232.5
Brick v. California Hydronics	1/14/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of the Fully Executed Settlement Agreement.	0.1	775	77.5
Brick v. California Hydronics	1/22/25	Hourly time entry	Unbilled	Brooke Nevells	Continue to edit and draft the Memorandum of Points and Authorities to the Motion for Preliminary Approval.	0.8	775	620
Brick v. California Hydronics	1/23/25	Hourly time entry	Unbilled	Brooke Nevells	Continue to draft the Memorandum of Points and Authorities.	2.3	775	1782.5
Brick v. California Hydronics	1/23/25	Hourly time entry	Unbilled	Brooke Nevells	Email exchanges with case administrator regarding the need of declaration. Draft of additional email attaching case caption for the declaration.	0.2	775	155
Brick v. California Hydronics	1/23/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email correspondence from Attorney Kyle regarding draft of the points and authorities and the settlement agreement.	0.1	775	77.5
Brick v. California Hydronics	1/24/25	Hourly time entry	Unbilled	Brooke Nevells	Finalize the Memorandum of Points and Authorities in Support of the Motion for Preliminary Approval.	1.5	775	1162.5
Brick v. California Hydronics	1/24/25	Hourly time entry	Unbilled	Brooke Nevells	Draft of email correspondence to Attorney Kyle to provide the points and authorities draft for the Motion for Preliminary Approval and the word version of the settlement agreement.	0.1	775	77.5
Brick v. California Hydronics	1/29/25	Hourly time entry	Unbilled	Brooke Nevells	Office conference between Attorney CEN and Attorney BBN about declaration, strategies for drafting and topics that need to be covered between two declarations.	0.3	775	232.5
Brick v. California Hydronics	1/29/25	Hourly time entry	Unbilled	Brooke Nevells	Draft of follow up email to Jodey regarding Declaration for the Preliminary Approval. Receipt and review of the same.	0.3	775	232.5
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Brooke Nevells	Draft of follow up email to Attorney Kyle regarding his declaration in support of the Motion for Preliminary Approval. Receipt of the same. Save to file.	0.2	775	155
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Brooke Nevells	Finalize and edit the Notice in Support of the Motion for Preliminary Approval.	0.3	775	232.5
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email exchanges regarding the upcoming Case Management Conference.	0.2	775	155
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Brooke Nevells	Edit and review the Proposed Order to the Motion for Preliminary Approval.	0.3	775	232.5
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Brooke Nevells	Review and edit the Declaration of Attorney Brooke B. Nevells in support of the Motion for Preliminary Approval.	0.3	775	232.5
Brick v. California Hydronics	1/31/25	Hourly time entry	Unbilled	Brooke Nevells	Search for the Notice, Opt-Out and objection forms.	0.2	775	155
Brick v. California Hydronics	2/3/25	Hourly time entry	Unbilled	Brooke Nevells	Office conference between Attorney CEN and Attorney BBN regarding Motion rejection and ideas to get around situation where the Court set this hearing but we have no reservation number.	0.2	775	155
Brick v. California Hydronics	2/19/25	Hourly time entry	Unbilled	Brooke Nevells	Memo to Legal Assistant Raha Razavi to calendar deadline and check tentative ruling on the Motion for Preliminary Approval.	0.1	775	77.5
Brick v. California Hydronics	2/26/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of the tentative ruling on the Motion for Preliminary Approval. Memo to file regarding the same.	0.3	775	232.5
Brick v. California Hydronics	2/28/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email exchanges with Co-Counsel regarding the upcoming CMC.	0.2	775	155
Brick v. California Hydronics	3/3/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence from Opposing Counsel regarding sample language to include in the amended release. Office conference with CEN regarding the same.	0.2	775	155
Brick v. California Hydronics	3/5/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email from Client regarding status update, and email from CEN regarding the same.	0.2	775	155
Brick v. California Hydronics	3/5/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of additional email exchanges with Client and CEN regarding update on the Motion for Preliminary Approval.	0.2	775	155
Brick v. California Hydronics	3/17/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email from Opposing Counsel confirming edits to the Settlement Agreement. Draft of email correspondence to Client regarding the revised Settlement Agreement for signature. Send to Client via BoxSign to sign. Draft of email to Co-Counsel regarding the same. Memo to file.	0.4	775	310
Brick v. California Hydronics	3/17/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of additional email correspondence from Opposing Counsel regarding new client signatures to the revised Settlement Agreement. Draft of email in reply regarding the same.	0.2	775	155
Brick v. California Hydronics	3/17/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of the signed settlement agreement by Kyle. Send to Co-Counsel Lenden for execution. Sign the Settlement Agreement. Send to Opposing Counsel for execution.	0.3	775	232.5
Brick v. California Hydronics	3/17/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email from Opposing Counsel regarding agreement to the revised language in the settlement agreement.	0.1	775	77.5
Brick v. California Hydronics	3/19/25	Hourly time entry	Unbilled	Brooke Nevells	Draft of follow up email to Opposing Counsel regarding status of signing the revised Settlement Agreement.	0.1	775	77.5
Brick v. California Hydronics	3/19/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of the signature page to the revised Settlement Agreement. Add to the back page to create one PDF of the fully executed Settlement Agreement.	0.2	775	155
Brick v. California Hydronics	3/20/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email exchanges with Client regarding confirmation of signing the revised settlement agreement.	0.2	775	155
Brick v. California Hydronics	3/26/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of Motion for Preliminary Approval of Settlement - Tentative Ruling - 2025 03 Mar 27, minute order for the continued Case Management Conference.	0.2	775	155
Brick v. California Hydronics	3/28/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email from Client regarding status of the approval, and reply email from CEN regarding the same.	0.2	775	155
Brick v. California Hydronics	4/2/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email from Alameda Court providing a copy of the Order Granting Preliminary Approval.	0.1	775	77.5
Brick v. California Hydronics	4/8/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email from Phoenix Administration regarding the timeline and information needed for Final Approval. Memo to file.	0.2	775	155
Brick v. California Hydronics	4/10/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence from Phoenix administration regarding receipt of class data. Memo to file.	0.1	775	77.5
Brick v. California Hydronics	4/21/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email exchanges with Client regarding class rep enhancement and status of the settlement.	0.3	775	232.5
Brick v. California Hydronics	4/21/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email from Attorney Lenden regarding email to Client regarding the enhancement award. Memo to file.	0.1	775	77.5
Brick v. California Hydronics	4/22/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email from Opposing Counsel regarding confirmation of mailing.	0.1	775	77.5
Brick v. California Hydronics	4/23/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email correspondence from Opposing Counsel regarding approval of the update notice.	0.1	775	77.5
Brick v. California Hydronics	5/1/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email from Phoenix Administration confirming first mailing our the scheduling order.	0.1	775	77.5
Brick v. California Hydronics	5/12/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of: Brick v. California Hydronics - Weekly Report.	0.1	775	77.5
Brick v. California Hydronics	5/22/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email from Client regarding appreciation for advice and counsel during the litigation.	0.2	775	155
Brick v. California Hydronics	5/23/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of weekly report from Phoenix Class Action administration.	0.1	775	77.5
Brick v. California Hydronics	5/30/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email from Phoenix re weekly report. Memo to file.	0.2	775	155
Brick v. California Hydronics	6/6/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email from Phoenix re weekly report. Memo to file.	0.2	775	155
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Brooke Nevells	(PCD .3) Correspondence between Attorney BBN and Law Clerk NPA regarding drafting a motion for final approval.	0.3	775	232.5
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Brooke Nevells	(PCD .3) Correspondence between Attorney BBN and Law Clerk NPA regarding drafting a motion for final approval.	-0.3	775	-232.5
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of Notice of Change of Address. Memo to file.	0.2	775	155
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of Notice of Change of Handling Attorneys. Memo to file.	0.2	775	155
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Brooke Nevells	(PCD .1) Internal memo between Attorney BBN, Attorney CEN, and Law Clerk NPA regarding updating the Proof of Service following a change of address by opposing counsel.	0.1	775	77.5
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Brooke Nevells	(PCD .1) Internal memo between Attorney BBN, Attorney CEN, and Law Clerk NPA regarding updating the Proof of Service following a change of address by opposing counsel.	-0.1	775	-77.5
Brick v. California Hydronics	6/16/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of the Phoenix Correspondence from 2025 06 June 13 re Weekly Case Status Report. .	0.1	775	77.5
Brick v. California Hydronics	6/16/25	Hourly time entry	Unbilled	Brooke Nevells	Internal memo between Attorney BBN, Attorney CEN, and Law Clerk NPA regarding Motion for Final Approval.	0.2	775	155
Brick v. California Hydronics	6/17/25	Hourly time entry	Unbilled	Brooke Nevells	Correspondence between Law Clerk NPA and Attorney BBN regarding Settlement Agreement.	0.1	775	77.5
Brick v. California Hydronics	6/20/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email from Phoenix regarding RE: Brick v. California Hydronics - Weekly Report.	0.2	775	155
Brick v. California Hydronics	6/30/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of Phoenix Correspondence from 2025 06 June 27 re Weekly Case Status Report. Memo to file.	0.2	775	155

Brick v. California Hydronics	7/1/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt of email from Client regarding status update, and email from CEN in response to the same.	0.2	775	155
Brick v. California Hydronics	7/2/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of email from Phoenix Group regarding the weekly report.	0.2	775	155
Brick v. California Hydronics	7/30/25	Hourly time entry	Unbilled	Brooke Nevells	Receipt and review of Declaration of Phoenix Administration in support of the Motion for Final Approval. Memo to file.	0.2	775	155
Brick v. California Hydronics	4/5/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of communication exchange between co-counsel AJ and Webb regarding joint prosecution agreement.	0.1	775	77.5
Brick v. California Hydronics	4/9/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of Notice of Association and status update on Client's signature for same. File save same.	0.1	775	77.5
Brick v. California Hydronics	4/9/24	Hourly time entry	Unbilled	Christopher Nichols	Draft memorandum to co-counsel regarding explanation of Joint Prosecution Agreement and discussion with co-counsel about same in terms of status update on case.	0.1	775	77.5
Brick v. California Hydronics	4/10/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Co-Counsel about joint Case Management Conference statement.	0.1	775	77.5
Brick v. California Hydronics	4/11/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from co-counsel regarding script for calls on Belaire-West.	0.1	775	77.5
Brick v. California Hydronics	4/11/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Co-Counsel regarding script status and timeline for calls overall.	0.1	775	77.5
Brick v. California Hydronics	4/17/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of signed Joint Prosecution Agreement and Notice of Change of Handling Attorney. File save same.	0.1	775	77.5
Brick v. California Hydronics	4/17/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to co-counsel's office about the Notice of Change of Handling Attorney and our file showing that as already filed. Discussion about whether that has already been filed and served.	0.1	775	77.5
Brick v. California Hydronics	4/17/24	Hourly time entry	Unbilled	Christopher Nichols	Review of working version of Notice of Change of Handling Attorney and Notice of Association. Draft correspondence regarding approval of same to co-counsel.	0.2	775	155
Brick v. California Hydronics	4/17/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from co-counsel serving notice of change of firm handling attorney and association. File save same.	0.1	775	77.5
Brick v. California Hydronics	4/22/24	Hourly time entry	Unbilled	Christopher Nichols	Draft updated revisions to the April 30, 2024 Case Management Conference Statement.	0.5	775	387.5
Brick v. California Hydronics	4/22/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah regarding Joint Case Management Statement.	0.1	775	77.5
Brick v. California Hydronics	4/22/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Sarah about Joint Case Management Conference statement and response from Co-counsel Webb.	0.2	775	155
Brick v. California Hydronics	4/22/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah to provide her with the Case Management Statement Joint draft and explanation of same.	0.1	775	77.5
Brick v. California Hydronics	4/23/24	Hourly time entry	Unbilled	Christopher Nichols	Office conference between Attorney CEN and BBN regarding the Case Management Conference edits and revisions from Opposing Counsel Sarah. Discussion about inserted section on deposition.	0.2	775	155
Brick v. California Hydronics	4/23/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah to serve joint case management conference statement.	0.1	775	77.5
Brick v. California Hydronics	4/23/24	Hourly time entry	Unbilled	Christopher Nichols	File Joint Case Management Conference Report.	0.1	775	77.5
Brick v. California Hydronics	4/23/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt of File Stamped Joint Case Management Conference. File save same.	0.1	775	77.5
Brick v. California Hydronics	4/23/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah informing her that we're accepting her revisions and we'll file.	0.1	775	77.5
Brick v. California Hydronics	4/25/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Co-Counsel related to Case Management Conference. Memo to co-counsel regarding same.	0.2	775	155
Brick v. California Hydronics	4/26/24	Hourly time entry	Unbilled	Christopher Nichols	Office conference with Attorney CEN and Attorney BBN regarding receipt of sampling, and action plan moving forward regarding sampling and preparing a damage excel spreadsheet.	0.4	775	310
Brick v. California Hydronics	4/29/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt of case status update from Co-Counsel's office. Draft responsive email to provide them with information about the paystub production and sampling.	0.1	775	77.5
Brick v. California Hydronics	5/1/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of general order on Case Management Conference. File save same and memo to co-counsel regarding order.	0.1	775	77.5
Brick v. California Hydronics	5/2/24	Hourly time entry	Unbilled	Christopher Nichols	Attempt phone call to Department 23 related to docket issue resulting in lack of service of orders. Receive message to direct inquiry via email.	0.1	775	77.5
Brick v. California Hydronics	5/2/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Department 23 related to receipt of order and non-service of co-counsel. Discussion of Notice provided and request to rectify.	0.1	775	77.5
Brick v. California Hydronics	5/2/24	Hourly time entry	Unbilled	Christopher Nichols	Brief exchange of correspondence with Co-Counsel Webb related to non-service of order and rectifying same.	0.1	775	77.5
Brick v. California Hydronics	5/3/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Sarah about how they are not agreeable to LA for the location and want bay area.	0.1	775	77.5
Brick v. California Hydronics	5/3/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondences from Co-Counsel and Mediator's office about attending mediation in Oakland.	0.1	775	77.5
Brick v. California Hydronics	5/6/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Co-Counsel should pay any travel fee associated with the mediation being in Oakland.	0.1	775	77.5
Brick v. California Hydronics	5/6/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Sarah indicating that they will pay the travel expenses for the mediator to get to Oakland.	0.1	775	77.5
Brick v. California Hydronics	5/6/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah indicating that we're agreeable to Oakland as long as they pay any travel expenses.	0.1	775	77.5
Brick v. California Hydronics	5/6/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Sarah regarding mediation and them being willing to pay for the travel. Correspondence from Judicate West confirming that they will update the mediator of same.	0.1	775	77.5
Brick v. California Hydronics	5/13/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Alex inquiring about mediation and settlement.	0.1	775	77.5
Brick v. California Hydronics	5/13/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Alex explaining to him when the mediator is and that we'd like him available via phone. Discussion of mediation process and possibility of settlement.	0.2	775	155
Brick v. California Hydronics	5/13/24	Hourly time entry	Unbilled	Christopher Nichols	Brief exchange of correspondence with Co-Counsel's Paralegal Syann regarding mediation and preparation for same.	0.1	775	77.5
Brick v. California Hydronics	5/13/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from co-counsel with update on Belaire-Witness calls.	0.1	775	77.5
Brick v. California Hydronics	5/14/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Alex confirming his availability the day of mediation.	0.1	775	77.5
Brick v. California Hydronics	5/14/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of case file transferred from Opposing Counsel. Organize and file save same.	0.2	775	155
Brick v. California Hydronics	6/5/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Alex asking about public aspects of lawsuit.	0.1	775	77.5
Brick v. California Hydronics	6/5/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Alex related to his question about public records from lawsuit. Explain that they are publicly accessible but not always in a way that comes up on background checks and its not guaranteed that they will see it.	0.2	775	155
Brick v. California Hydronics	6/5/24	Hourly time entry	Unbilled	Christopher Nichols	Office conference between Attorney CEN and Attorney BBN regarding mediation, plan and logistics for same.	0.1	775	77.5
Brick v. California Hydronics	6/11/24	Hourly time entry	Unbilled	Christopher Nichols	Brief exchange of correspondence with Co-Counsel Webb about mediation and preparation for same.	0.1	775	77.5
Brick v. California Hydronics	7/8/24	Hourly time entry	Unbilled	Christopher Nichols	Office conference with CEN regarding upcoming mediation and action plan moving forward. Draft of email to Co-Counsel regarding attendance.	0.2	775	155
Brick v. California Hydronics	7/9/24	Hourly time entry	Unbilled	Christopher Nichols	Office conference with CEN and BBN regarding Defendant's Mediation brief and action plan moving forward.	0.2	775	155
Brick v. California Hydronics	7/9/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to provide Mediation brief to mediator Young.	0.1	775	77.5
Brick v. California Hydronics	7/9/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel to deliver the Mediation briefing.	0.1	775	77.5
Brick v. California Hydronics	7/9/24	Hourly time entry	Unbilled	Christopher Nichols	Draft Plaintiff's Mediation Brief.	2.1	775	1627.5
Brick v. California Hydronics	7/9/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of Mediation Briefing from Defendants.	0.3	775	232.5
Brick v. California Hydronics	7/11/24	Hourly time entry	Unbilled	Christopher Nichols	Brief exchange of correspondence with Co-Counsel's assistant Jocelyn regarding Joint Case Management Statement.	0.1	775	77.5
Brick v. California Hydronics	7/12/24	Hourly time entry	Unbilled	Christopher Nichols	Office conference between Attorney CEN and Attorney BBN regarding the mediation, case value, excel spreadsheet to itemize damages.	0.2	775	155
Brick v. California Hydronics	7/15/24	Hourly time entry	Unbilled	Christopher Nichols	Review of Defendant's Mediation Brief and arguments contained therein to prepare for mediation.	0.7	775	542.5
Brick v. California Hydronics	7/16/24	Hourly time entry	Unbilled	Christopher Nichols	Attend Mediation in Oakland with Mediator Michael D. Young.	5.7	775	4417.5
Brick v. California Hydronics	7/16/24	Hourly time entry	Unbilled	Christopher Nichols	Travel time to Oakland Judicate West office from San Diego via Plane and BART.	3.2	775	2480
Brick v. California Hydronics	7/16/24	Hourly time entry	Unbilled	Christopher Nichols	Travel time to San Diego from Oakland Judicate West office via BART and plane.	3	775	2325
Brick v. California Hydronics	7/16/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Alex following up on mediation.	0.1	775	77.5
Brick v. California Hydronics	7/17/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Alex explaining settlement, mediation, and next steps. Ask client for availability to setup discussion about approval process and next steps.	0.3	775	232.5
Brick v. California Hydronics	7/17/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc requesting MOU and term sheet from yesterday's mediation.	0.1	775	77.5
Brick v. California Hydronics	7/17/24	Hourly time entry	Unbilled	Christopher Nichols	Office conference between Attorney BBN and Attorney CEN about mediation outcome, next steps, communication with client, and obtaining MOU from opposing counsel.	0.2	775	155
Brick v. California Hydronics	7/17/24	Hourly time entry	Unbilled	Christopher Nichols	Office conference with Attorney CEN and BBN regarding outcome of call with Client regarding settlement. Further discussion regarding the MOU and edits that need to be made.	0.3	775	232.5

Brick v. California Hydronics	7/17/24	Hourly time entry	Unbilled	Christopher Nichols	Telephone conference with Client Alex Brick regarding settlement, issues with case on meal and rest breaks, his deposition testimony and potential amount received in settlement.	0.6	775	465
Brick v. California Hydronics	7/17/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Marc containing MOU for mediation. Review of same.	0.2	775	155
Brick v. California Hydronics	7/17/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc regarding needing to provide a redline.	0.1	775	77.5
Brick v. California Hydronics	7/18/24	Hourly time entry	Unbilled	Christopher Nichols	Office conference between Attorney BBN and Attorney CEN about alterations to the MOU and redlines for the settlement.	0.3	775	232.5
Brick v. California Hydronics	7/19/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Sarah about draft CMC statement which is due to Court next week.	0.1	775	77.5
Brick v. California Hydronics	7/19/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah regarding final redline from our side and also Case Management Conference statement.	0.1	775	77.5
Brick v. California Hydronics	7/19/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Co-Counsel AJ regarding release language revision to MOU.	0.2	775	155
Brick v. California Hydronics	7/22/24	Hourly time entry	Unbilled	Christopher Nichols	Brief exchange of correspondence with Co-Counsel's office about the Case Management Statement.	0.1	775	77.5
Brick v. California Hydronics	7/22/24	Hourly time entry	Unbilled	Christopher Nichols	Draft revisions to Attorney BBN email to Client Brick to assuage his concerns regarding settlement value. Add portions to explain that the damages were lower and the penalties would be reduced.	0.2	775	155
Brick v. California Hydronics	7/22/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Brick with questions and concerns about settlement value and amount. Discussion about reasons why he thinks it should be higher.	0.2	775	155
Brick v. California Hydronics	7/22/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Attorney BBN to Client Brick regarding class action settlement and rationale for why this is a good result.	0.1	775	77.5
Brick v. California Hydronics	7/22/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of additional correspondence from Brick explaining why they didn't pay him the discretionary bonus is wrong in his opinion and other issues with disability PTO issues. Memo to file regarding same.	0.2	775	155
Brick v. California Hydronics	7/22/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah with updated Case Management Conference statement.	0.1	775	77.5
Brick v. California Hydronics	7/22/24	Hourly time entry	Unbilled	Christopher Nichols	Telephone conference between Attorney BBN and Attorney CEN regarding Client Brick's concerns with settlement amount and his point as it relates to the bonuses and other issues that are being brought up now. Discussion regarding responsive email draft.	0.2	775	155
Brick v. California Hydronics	7/22/24	Hourly time entry	Unbilled	Christopher Nichols	Draft of Joint Case Management Conference Statement.	0.4	775	310
Brick v. California Hydronics	7/22/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah regarding the draft Case Management Conference statement and delivery of same.	0.1	775	77.5
Brick v. California Hydronics	7/23/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to serve the Joint Case Management Statement.	0.1	775	77.5
Brick v. California Hydronics	7/23/24	Hourly time entry	Unbilled	Christopher Nichols	Finalize and file Joint Case Management Conference statement with the Court.	0.1	775	77.5
Brick v. California Hydronics	7/23/24	Hourly time entry	Unbilled	Christopher Nichols	Draft revised Case Management Conference Statement to be sent to Opposing Counsel.	0.1	775	77.5
Brick v. California Hydronics	7/23/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah about redline document and email thread being sent to wrong email.	0.1	775	77.5
Brick v. California Hydronics	7/23/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to opposing counsel Sarah to deliver updated version of the Joint Case Management Conference statement based on what I believe the edit is.	0.1	775	77.5
Brick v. California Hydronics	7/23/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Marc with redline to Case Management Statement. Review of same.	0.1	775	77.5
Brick v. California Hydronics	7/23/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc accepting edit and confirming we will be filing the same.	0.1	775	77.5
Brick v. California Hydronics	7/23/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah to follow up on status of revisions to the Case Management Conference Statement.	0.1	775	77.5
Brick v. California Hydronics	7/24/24	Hourly time entry	Unbilled	Christopher Nichols	Telephone conference between Attorney CEN and Opposing Counsel Marc related to the release language.	0.2	775	155
Brick v. California Hydronics	7/24/24	Hourly time entry	Unbilled	Christopher Nichols	Office conference between Attorney BBN and Attorney CEN about release language in settlement, acceptance of other changes.	0.2	775	155
Brick v. California Hydronics	7/24/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel containing redline edits to MOU. Review of same.	0.2	775	155
Brick v. California Hydronics	7/24/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of filed Case Management Conference. File save same.	0.1	775	77.5
Brick v. California Hydronics	7/25/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc reiterating what was said on our phone call, which is that we need exemplary release language to clear things up on our end.	0.1	775	77.5
Brick v. California Hydronics	7/25/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Alex regarding follow up on settlement.	0.1	775	77.5
Brick v. California Hydronics	7/25/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Brick regarding settlement value, explanation of terms that I tweaked to make it better for him and the class and provide rationale and reasoning why this is the best settlement for all involved.	0.3	775	232.5
Brick v. California Hydronics	7/25/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of Released Class Claims language from the sample class action settlement agreement that opposing counsel would propose we use here.	0.2	775	155
Brick v. California Hydronics	7/26/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of tentative ruling pushing the CMC back to December when the Motion for Preliminary Approval will be held. Calendar same.	0.2	775	155
Brick v. California Hydronics	7/26/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc regarding follow up on the MOU and additional verbiage provided by our co-counsel for the ultimate release.	0.2	775	155
Brick v. California Hydronics	8/2/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client stating that it all sounds good and thanking me for the response.	0.1	775	77.5
Brick v. California Hydronics	8/2/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc related to follow up on MOU.	0.1	775	77.5
Brick v. California Hydronics	8/8/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc asking if we can circulate for signatures.	0.1	775	77.5
Brick v. California Hydronics	8/11/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of follow up correspondence from Client about next steps with the settlement.	0.1	775	77.5
Brick v. California Hydronics	8/12/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc to follow up on the settlement agreement to see if we still have a settlement.	0.1	775	77.5
Brick v. California Hydronics	8/12/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Marc about how he thought he approved this but asking for the most recent version of it.	0.1	775	77.5
Brick v. California Hydronics	8/12/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to send Opposing Counsel Marc the most recent version of the redline for signatures.	0.1	775	77.5
Brick v. California Hydronics	8/12/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Marc about how he's sending the execution copy of the document. Review and determine that it is his mediation brief.	0.1	775	77.5
Brick v. California Hydronics	8/12/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel after determining that the document sent is his mediation brief not the MOU. Request MOU.	0.1	775	77.5
Brick v. California Hydronics	8/12/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Marc containing signature copy.	0.1	775	77.5
Brick v. California Hydronics	8/14/24	Hourly time entry	Unbilled	Christopher Nichols	Execute MOU on behalf of our firm. Prepare MOU to be sent to client for signature and draft message to client to deliver signature request.	0.2	775	155
Brick v. California Hydronics	8/14/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondences containing Co-Counsel's signatures on the MOUs.	0.1	775	77.5
Brick v. California Hydronics	8/19/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Brick regarding the settlement MOU and needing his signature on the document.	0.1	775	77.5
Brick v. California Hydronics	8/19/24	Hourly time entry	Unbilled	Christopher Nichols	Prepare MOU for e-signing by Client and re-send the MOU to the Client for his signature. Draft note for client about signing.	0.1	775	77.5
Brick v. California Hydronics	8/19/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Brick regarding class enhancement award. Discussion regarding split with other employees.	0.1	775	77.5
Brick v. California Hydronics	8/19/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Brick explaining to him that the 7,500 is not guaranteed, but up the judge although it is highly likely that he will relieve it because we will submit a declaration on his behalf about what he did.	0.2	775	155
Brick v. California Hydronics	8/19/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc regarding the MOU execution and requesting their template.	0.1	775	77.5
Brick v. California Hydronics	8/19/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Marc about how they have signed and are awaiting a signature from their client.	0.1	775	77.5
Brick v. California Hydronics	8/20/24	Hourly time entry	Unbilled	Christopher Nichols	Brief exchange of correspondence with Client Alex regarding him signing the MOU.	0.1	775	77.5
Brick v. California Hydronics	8/26/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc regarding MOU and waiting on his client's signature.	0.1	775	77.5
Brick v. California Hydronics	8/26/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of fully executed Settlement Agreement MOU. File save same.	0.2	775	155
Brick v. California Hydronics	8/26/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc to discuss scheduling a time to speak about longform.	0.1	775	77.5
Brick v. California Hydronics	9/3/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc about follow up call on the long form settlement agreement.	0.1	775	77.5
Brick v. California Hydronics	9/10/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to follow up with Opposing Counsel Marc regarding the settlement agreement longform.	0.1	775	77.5
Brick v. California Hydronics	9/16/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc regarding scheduling a time to speak with him and next steps. Discussion of if we don't hear from him by Wednesday, we'll just do it our way.	0.2	775	155
Brick v. California Hydronics	9/16/24	Hourly time entry	Unbilled	Christopher Nichols	Brief exchange with Opposing Counsel Marc regarding longform settlement and call on Wednesday to discuss.	0.1	775	77.5
Brick v. California Hydronics	9/18/24	Hourly time entry	Unbilled	Christopher Nichols	Telephone conference with Opposing Counsel Marc regarding settlement agreement, form to use and sending him a draft early next week. Memo to file regarding same.	0.2	775	155

Brick v. California Hydronics	9/18/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Marc about settlement agreement and draft being sent next week.	0.1	775	77.5
Brick v. California Hydronics	10/15/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Alex asking about opt outs for the lawsuit.	0.1	775	77.5
Brick v. California Hydronics	10/15/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Brick about the timeline with the settlement and motion for preliminary approval. Discussion about hearing and when we would theoretically know about opt outs.	0.2	775	155
Brick v. California Hydronics	10/15/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Marc regarding long form settlement agreement.	0.1	775	77.5
Brick v. California Hydronics	10/15/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc to inform him of the timing with the long form settlement agreement.	0.1	775	77.5
Brick v. California Hydronics	10/18/24	Hourly time entry	Unbilled	Christopher Nichols	Begin to draft Class Action Settlement Agreement.	1.2	775	930
Brick v. California Hydronics	10/19/24	Hourly time entry	Unbilled	Christopher Nichols	Begin draft of Class Notice as part of settlement paperwork.	0.3	775	232.5
Brick v. California Hydronics	10/20/24	Hourly time entry	Unbilled	Christopher Nichols	Draft revisions to Class Notice to include information about amount of settlement, time frames in question, and specific details about the settlement paperwork.	0.8	775	620
Brick v. California Hydronics	10/20/24	Hourly time entry	Unbilled	Christopher Nichols	Continue to draft Class Action Settlement Agreement. Insert case specific details, such as release case data, and specific provisions applicable to this case.	1.2	775	930
Brick v. California Hydronics	10/21/24	Hourly time entry	Unbilled	Christopher Nichols	Revise Class Notice with updated release language.	0.4	775	310
Brick v. California Hydronics	10/21/24	Hourly time entry	Unbilled	Christopher Nichols	Revise Class Action Settlement Agreement to finalize to be sent to Opposing Counsel Marc.	0.4	775	310
Brick v. California Hydronics	10/21/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc regarding the Class Settlement Agreement and Class Notice documents. Discussion regarding administrator selection and placeholder costs amount. Discussion regarding the additional opt-out/pay period documents to be sent.	0.2	775	155
Brick v. California Hydronics	10/21/24	Hourly time entry	Unbilled	Christopher Nichols	Draft Pay Period Dispute Form.	0.3	775	232.5
Brick v. California Hydronics	10/21/24	Hourly time entry	Unbilled	Christopher Nichols	Draft Opt-Out form for exclusion from the Class Action Settlement.	0.3	775	232.5
Brick v. California Hydronics	10/21/24	Hourly time entry	Unbilled	Christopher Nichols	Revise Opt-Out and Objection forms to include case number and county.	0.1	775	77.5
Brick v. California Hydronics	10/21/24	Hourly time entry	Unbilled	Christopher Nichols	Draft Class Action Objection form.	0.3	775	232.5
Brick v. California Hydronics	10/21/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc to provide him with the opt-out, objection, and pay period dispute form drafts.	0.1	775	77.5
Brick v. California Hydronics	11/6/24	Hourly time entry	Unbilled	Christopher Nichols	Draft follow up correspondence to Opposing Counsel Marc regarding settlement agreement status. Memo to file regarding same.	0.1	775	77.5
Brick v. California Hydronics	11/12/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Sarah about the settlement agreement and timeline for that to be sent.	0.1	775	77.5
Brick v. California Hydronics	11/12/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah regarding the deadline for the Motion for Preliminary Approval. Discussion regarding draft of stipulation for same.	0.2	775	155
Brick v. California Hydronics	11/13/24	Hourly time entry	Unbilled	Christopher Nichols	Brief exchange of correspondence with co-counsel's office about the joint case management conference statement.	0.1	775	77.5
Brick v. California Hydronics	11/15/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah following up on the revisions to the settlement agreement. Discussion regarding using joint case management conference report to request a new date for the motion hearing.	0.1	775	77.5
Brick v. California Hydronics	11/15/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Sarah about PAGA section needing revisions and liking our idea about informing the Court of our need for additional time in the joint CMC statement.	0.1	775	77.5
Brick v. California Hydronics	11/21/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah regarding following up on the revisions.	0.1	775	77.5
Brick v. California Hydronics	11/22/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Sarah with revisions to the Settlement Agreement. Brief review of revisions.	0.3	775	232.5
Brick v. California Hydronics	11/26/24	Hourly time entry	Unbilled	Christopher Nichols	Draft Joint Case Management Conference Statement.	0.3	775	232.5
Brick v. California Hydronics	12/3/24	Hourly time entry	Unbilled	Christopher Nichols	Submit requests for quotes to Simpluris CPT Group and Phoenix.	0.3	775	232.5
Brick v. California Hydronics	12/3/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Court Clerk to request the remote appearance link.	0.1	775	77.5
Brick v. California Hydronics	12/11/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah for Joint Case Management Conference report. Memo to file about same.	0.2	775	155
Brick v. California Hydronics	12/11/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Sarah confirming the joint report is sufficient.	0.1	775	77.5
Brick v. California Hydronics	12/11/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah to provide redlines and additional information about Simpluris bid and status of obtaining bids.	0.2	775	155
Brick v. California Hydronics	12/11/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from CPT Group regarding bid on class admin.	0.1	775	77.5
Brick v. California Hydronics	12/11/24	Hourly time entry	Unbilled	Christopher Nichols	Memo to file regarding the cost and pricing on class admin quotes related to preference for cheaper admin.	0.1	775	77.5
Brick v. California Hydronics	12/11/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah regarding quote received from CPT and preference for Simpluris as admin so far.	0.1	775	77.5
Brick v. California Hydronics	12/12/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah to provide her with the Phoenix admin quote and information on the lowest two bids.	0.1	775	77.5
Brick v. California Hydronics	12/12/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of quote from Phoenix class action for the admin.	0.1	775	77.5
Brick v. California Hydronics	12/19/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah to follow up on the Settlement Agreement.	0.1	775	77.5
Brick v. California Hydronics	12/19/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel about their delay in returning revisions on the settlement agreement.	0.1	775	77.5
Brick v. California Hydronics	12/19/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah and Marc asking if Marc can review the revisions as we told the court it would be executed with 15-30 days and they want to take 18 days to get back to us from the last round of edits.	0.2	775	155
Brick v. California Hydronics	12/19/24	Hourly time entry	Unbilled	Christopher Nichols	Office conference between Attorney CEN and Attorney BBN regarding admin quotes, timeline for motion for preliminary approval, and requesting that opposing counsel return the document sooner.	0.2	775	155
Brick v. California Hydronics	12/19/24	Hourly time entry	Unbilled	Christopher Nichols	Brief exchange of correspondence with Opposing Counsel Sarah about timing of review and Marc reviewing next week.	0.1	775	77.5
Brick v. California Hydronics	12/30/24	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah to follow up on their lack of revisions that were previously promised to us.	0.1	775	77.5
Brick v. California Hydronics	12/31/24	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Sarah about how she thought Marc handled this already and how she will look at it.	0.1	775	77.5
Brick v. California Hydronics	1/2/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Sarah asking for a status update on the redlines.	0.1	775	77.5
Brick v. California Hydronics	1/2/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Marc about how they are working on it and will send it by noon.	0.1	775	77.5
Brick v. California Hydronics	1/3/25	Hourly time entry	Unbilled	Christopher Nichols	Draft follow up correspondence to Opposing Counsel Marc about the Cal Hydronics final settlement agreement draft.	0.1	775	77.5
Brick v. California Hydronics	1/5/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from co-counsel with questions about the release. Discussion about being a signatory.	0.1	775	77.5
Brick v. California Hydronics	1/7/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client about signing settlement agreement.	0.1	775	77.5
Brick v. California Hydronics	1/7/25	Hourly time entry	Unbilled	Christopher Nichols	Draft memorandum to Co-Counsel about signatory status and the understanding that the release is the one used by the model form so it is acceptable to the Court.	0.2	775	155
Brick v. California Hydronics	1/8/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Alex about the settlement paperwork we need him to sign and the process.	0.2	775	155
Brick v. California Hydronics	1/8/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Alex regarding receipt of signed documents.	0.1	775	77.5
Brick v. California Hydronics	1/8/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Alex regarding split for the other people and when this will happen.	0.2	775	155
Brick v. California Hydronics	1/8/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client about timeline for the Motion for Approval. Discussion regarding timeline for checks to be paid out. Discussion regarding process.	0.2	775	155
Brick v. California Hydronics	1/16/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of fully executed Class Action Settlement Agreement. Memo to file regarding deadlines and action plan for finalizing.	0.2	775	155
Brick v. California Hydronics	1/25/25	Hourly time entry	Unbilled	Christopher Nichols	Brief exchange of correspondence with Co-Counsel regarding future Case Management conference statement.	0.2	775	155
Brick v. California Hydronics	1/27/25	Hourly time entry	Unbilled	Christopher Nichols	Draft Declaration of Alexander Brick for Settlement Approval Motion.	0.7	775	542.5
Brick v. California Hydronics	1/27/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Alex about the need for him to sign a declaration about the settlement and approval.	0.2	775	155
Brick v. California Hydronics	1/27/25	Hourly time entry	Unbilled	Christopher Nichols	Prepare finalized Declaration of Alex Brick to be sent for signature. Draft correspondence to client to deliver signature request.	0.2	775	155
Brick v. California Hydronics	1/27/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence containing client's signed declaration on approval. Memo to file regarding same.	0.1	775	77.5
Brick v. California Hydronics	1/27/25	Hourly time entry	Unbilled	Christopher Nichols	Brief exchange of correspondence with Client Alex about him signing the settlement agreement.	0.1	775	77.5
Brick v. California Hydronics	1/29/25	Hourly time entry	Unbilled	Christopher Nichols	Office conference between Attorney CEN and Attorney BBN about declaration, strategies for drafting and topics that need to be covered between two declarations.	0.3	775	232.5
Brick v. California Hydronics	1/29/25	Hourly time entry	Unbilled	Christopher Nichols	Draft Declaration of Brooke B. Nevels in Support of Preliminary Approval of Class Settlement.	2.3	775	1782.5
Brick v. California Hydronics	1/29/25	Hourly time entry	Unbilled	Christopher Nichols	Revise Declaration of Lenden Webb in support of Preliminary Approval of Class Settlement.	1.4	775	1085
Brick v. California Hydronics	1/29/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Jodey with Phoenix providing their declaration for the administration to be provided with motion for preliminary approval. Determine it is agreeable.	0.2	775	155

Brick v. California Hydronics	1/29/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Co-Counsel Webb with his declaration and notes from him about certain aspects of it.	0.2	775	155
Brick v. California Hydronics	1/29/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Co-Counsel Webb regarding the fees and costs not being needed on this go around.	0.1	775	77.5
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Christopher Nichols	Continue revisions to Declaration of Lenden F. Webb to include information about the class representative and to finalize for co-counsel review.	0.6	775	465
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Christopher Nichols	Finalize Declaration of Brooke B. Nevels in Support of Preliminary Approval by ensuring that section on risks is updated and including PAGA information.	0.5	775	387.5
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of Co-Counsel Kyle's declaration on Motion for Preliminary Approval. Memo to file regarding same.	0.1	775	77.5
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Christopher Nichols	Review and revise the Memorandum of Points and Authorities. Insert citations to declarations of Webb, Nevels, and Nordrahaug. Revise section on defenses and risks to include updated information from the declarations.	0.8	775	620
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Christopher Nichols	Draft internal memorandum regarding exhibits to the settlement agreement.	0.1	775	77.5
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Co-Counsel Webb explaining the changes to his declaration and the changes to the Declaration of Nevels. Discussion about combined information being spread across both.	0.3	775	232.5
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Co-Counsel providing his signed declaration and information about the fees and costs.	0.1	775	77.5
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Co-Counsel Webb to discuss the fees and costs being presented here on the motion for final approval.	0.1	775	77.5
Brick v. California Hydronics	1/31/25	Hourly time entry	Unbilled	Christopher Nichols	Brief exchange of correspondence with Settlement Administrator regarding quote.	0.1	775	77.5
Brick v. California Hydronics	2/3/25	Hourly time entry	Unbilled	Christopher Nichols	Office conference between Attorney CEN and Attorney BBN regarding Motion rejection and ideas to get around situation where the Court set this hearing but we have no reservation number.	0.2	775	155
Brick v. California Hydronics	2/3/25	Hourly time entry	Unbilled	Christopher Nichols	Revise Notice to Include Court's Order scheduling hearing. File Motion for Preliminary Approval.	0.2	775	155
Brick v. California Hydronics	2/3/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of filing rejection. Review to determine the issue is related to a reservation number, but this hearing was set via Court order. Memo to file regarding same.	0.1	775	77.5
Brick v. California Hydronics	2/3/25	Hourly time entry	Unbilled	Christopher Nichols	Draft memorandum to file regarding the reservation number issue. Memo to file regarding same.	0.1	775	77.5
Brick v. California Hydronics	2/5/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of e-filing notification regarding reservation issue. Memo to file regarding same.	0.1	775	77.5
Brick v. California Hydronics	2/5/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Court Clerk containing reservation number.	0.1	775	77.5
Brick v. California Hydronics	2/11/25	Hourly time entry	Unbilled	Christopher Nichols	File Settlement and Motion for Preliminary Approval with the LWDA.	0.2	775	155
Brick v. California Hydronics	2/27/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel's Marc and Sarah regarding terminology used in the Settlement Agreement and proposed revised language. Discussion of the ways we would propose handling.	0.3	775	232.5
Brick v. California Hydronics	2/27/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel Marc about how they have language and will get back to us next week.	0.1	775	77.5
Brick v. California Hydronics	3/3/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of order from Alameda Court regarding the Motion regarding Preliminary Approval. Memo to file regarding same.	0.2	775	155
Brick v. California Hydronics	3/4/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Alex asking for a follow up on the motion for preliminary approval.	0.1	775	77.5
Brick v. California Hydronics	3/5/25	Hourly time entry	Unbilled	Christopher Nichols	Draft update to Client about postponed hearing on approval and next steps.	0.1	775	77.5
Brick v. California Hydronics	3/5/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Opposing Counsel Marc to let him know we will lookout for language the following week.	0.1	775	77.5
Brick v. California Hydronics	3/5/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Alex about the delay on Cal Hydronics part.	0.1	775	77.5
Brick v. California Hydronics	3/5/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Alex to explain to him the changes being made and the verbaage the Court requested.	0.2	775	155
Brick v. California Hydronics	3/19/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of email correspondence from Opposing Counsel Marc containing the final settlement agreement with revised language.	0.1	775	77.5
Brick v. California Hydronics	3/20/25	Hourly time entry	Unbilled	Christopher Nichols	File and serve the Supplemental Declaration of Lenden Webb and Proposed Order.	0.2	775	155
Brick v. California Hydronics	3/20/25	Hourly time entry	Unbilled	Christopher Nichols	Filed proposed settlement agreement and proposed order with labor and workforce development agency	0.2	775	155
Brick v. California Hydronics	3/20/25	Hourly time entry	Unbilled	Christopher Nichols	Draft supplemental declaration of Lenden Webb in support of motion for preliminary approval	0.8	775	620
Brick v. California Hydronics	3/20/25	Hourly time entry	Unbilled	Christopher Nichols	Draft updated proposed order to reflect changes from prior version provided to court	0.2	775	155
Brick v. California Hydronics	3/20/25	Hourly time entry	Unbilled	Christopher Nichols	Prepare and compile red lines to be attached to declaration of Lenden Webb as exhibits pursuant to court's order on preliminary approval	0.4	775	310
Brick v. California Hydronics	3/20/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of updated PAGA settlement submission acceptance from LWDA. Memo to file regarding same.	0.1	775	77.5
Brick v. California Hydronics	3/20/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Alex about how we are submitting the new agreement to the Court and will attend and handle the hearing next week.	0.1	775	77.5
Brick v. California Hydronics	3/21/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of filed supplemental declaration. Memo to file regarding same.	0.1	775	77.5
Brick v. California Hydronics	3/26/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Co-Counsel Webb regarding timeline, providing order to class administrator and final approval motion drafting.	0.3	775	232.5
Brick v. California Hydronics	3/27/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Co-Counsel Kyle with ruling and information about the final approval hearing.	0.1	775	77.5
Brick v. California Hydronics	3/27/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of Order from Court granting motion on preliminary approval. Review of approval motion number. Memo to file regarding calendaring.	0.2	775	155
Brick v. California Hydronics	3/28/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Alex regarding update on Motion for Preliminary Approval.	0.1	775	77.5
Brick v. California Hydronics	3/28/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Alex regarding the Motion for Preliminary Approval being granted. Discussion of next steps and final approval date.	0.2	775	155
Brick v. California Hydronics	4/1/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to provide order to Jodey at phoenix to start the process of class notice.	0.2	775	155
Brick v. California Hydronics	4/2/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Phoenix class actions about Order on Preliminary Approval and next steps for Defense Counsel uploading data.	0.1	475	47.5
Brick v. California Hydronics	4/2/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Phoenix class action admin to pass along the signed proposed order.	0.1	775	77.5
Brick v. California Hydronics	4/2/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of signed Proposed Order from Court granting preliminary approval.	0.1	775	77.5
Brick v. California Hydronics	4/3/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Class Admin regarding request for Settlement Agreement.	0.1	775	77.5
Brick v. California Hydronics	4/4/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to send over the Settlement Agreement documentation to the class administrator.	0.1	775	77.5
Brick v. California Hydronics	4/18/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Luvia with Class Administrator regarding questions on class notice, the calculations, and information about same.	0.2	775	155
Brick v. California Hydronics	4/21/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Client Alex about 7500 that we had to get approval for.	0.1	775	77.5
Brick v. California Hydronics	4/22/25	Hourly time entry	Unbilled	Christopher Nichols	Draft correspondence to Client Alex about the \$7,500 class enhancement award. Discussion regarding calculations for normal class shares.	0.2	775	155
Brick v. California Hydronics	4/23/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of updated notice.	0.1	775	77.5
Brick v. California Hydronics	4/23/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Opposing Counsel approving notice.	0.1	775	77.5
Brick v. California Hydronics	5/9/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Class Admin regarding weekly report.	0.1	775	77.5
Brick v. California Hydronics	5/16/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondence from Class Administrator containing Weekly Report of opt outs.	0.1	775	77.5
Brick v. California Hydronics	5/22/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of correspondences from Client Alex apologizing for being difficult and being grateful for the result.	0.1	775	77.5
Brick v. California Hydronics	5/23/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of Weekly Opt-Out report from Phoenix.	0.1	775	77.5
Brick v. California Hydronics	5/30/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of Weekly Class Opt-Out Report.	0.1	775	77.5
Brick v. California Hydronics	6/6/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of Weekly Class Opt-Out Report.	0.1	775	77.5
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Christopher Nichols	(PCD. 1) Internal memo between Attorney BBN, Attorney CEN, and Law Clerk NPA regarding updating the Proof of Service following a change of address by opposing counsel.	0.1	775	77.5
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Christopher Nichols	(PCD. 1) Internal memo between Attorney BBN, Attorney CEN, and Law Clerk NPA regarding updating the Proof of Service following a change of address by opposing counsel.	-0.1	775	-77.5
Brick v. California Hydronics	6/13/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of weekly report from Class Admin.	0.1	775	77.5
Brick v. California Hydronics	6/16/25	Hourly time entry	Unbilled	Christopher Nichols	Internal memo between Attorney BBN, Attorney CEN, and Law Clerk NPA regarding Motion for Final Approval.	0.2	775	155
Brick v. California Hydronics	6/20/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of weekly report from Class Admin.	0.1	775	77.5
Brick v. California Hydronics	6/27/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of weekly report from Class Admin.	0.1	775	77.5
Brick v. California Hydronics	7/2/25	Hourly time entry	Unbilled	Christopher Nichols	Receipt and review of weekly report from Class Admin.	0.1	775	77.5
Brick v. California Hydronics	8/4/25	Hourly time entry	Unbilled	Christopher Nichols	Office conference between Attorney CEN, Law Clerk AMR and NPA regarding motion for final approval.	0.1	775	77.5

Brick v. California Hydronics	8/4/25	Hourly time entry	Unbilled	Christopher Nichols	Office conference between Attorney CEN and Law Clerk AMR regarding action to review final approval motion.	0.1	775	77.5
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Mika Ince	File saved opposing side Notice of Change of address and updated proof of service	0.1	250	25
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Noah Adams	(PCD .3) Correspondence between Attorney BBN and Law Clerk NPA regarding drafting a motion for final approval.	0.3	300	90
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Noah Adams	(PCD .3) Correspondence between Attorney BBN and Law Clerk NPA regarding drafting a motion for final approval.	-0.3	300	-90
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Noah Adams	(PCD .1) Internal memo between Attorney BBN, Attorney CEN, and Law Clerk NPA regarding updating the Proof of Service following a change of address by opposing counsel.	0.1	300	30
Brick v. California Hydronics	6/10/25	Hourly time entry	Unbilled	Noah Adams	(PCD .1) Internal memo between Attorney BBN, Attorney CEN, and Law Clerk NPA regarding updating the Proof of Service following a change of address by opposing counsel.	-0.1	300	-30
Brick v. California Hydronics	6/13/25	Hourly time entry	Unbilled	Noah Adams	Researched and gathered all required samples and templates needed to draft Motion for Final Approval and Motion for Attorney Fees.	0.3	300	90
Brick v. California Hydronics	6/16/25	Hourly time entry	Unbilled	Noah Adams	Prepared and drafted Motion for Final Approval - Notice.	1	300	300
Brick v. California Hydronics	6/16/25	Hourly time entry	Unbilled	Noah Adams	Internal memo between Attorney BBN, Attorney CEN, and Law Clerk NPA regarding Motion for Final Approval.	0.2	300	60
Brick v. California Hydronics	6/16/25	Hourly time entry	Unbilled	Noah Adams	(PCD .5) Prepared and drafted Motion for Final Approval - Memorandum of Points and Authorities.	4.3	300	1290
Brick v. California Hydronics	6/16/25	Hourly time entry	Unbilled	Noah Adams	(PCD .5) Prepared and drafted Motion for Final Approval - Memorandum of Points and Authorities.	-0.5	300	-150
Brick v. California Hydronics	6/16/25	Hourly time entry	Unbilled	Noah Adams	Internal memo between Attorney BBN and Law Clerk NPA regarding issue with Litigation Expenses within Notice to Class and Settlement Agreement.	0.1	300	30
Brick v. California Hydronics	6/17/25	Hourly time entry	Unbilled	Noah Adams	(PCD .5) Prepared and drafted Motion for Final Approval - Memorandum of Points and Authorities.	3.6	300	1080
Brick v. California Hydronics	6/17/25	Hourly time entry	Unbilled	Noah Adams	(PCD .5) Prepared and drafted Motion for Final Approval - Memorandum of Points and Authorities.	-0.5	300	-150
Brick v. California Hydronics	6/17/25	Hourly time entry	Unbilled	Noah Adams	Correspondence between Law Clerk NPA and Attorney BBN regarding Settlement Agreement.	0.1	300	30
Brick v. California Hydronics	6/17/25	Hourly time entry	Unbilled	Noah Adams	(PCD .5) Prepared and drafted portion within Motion for Final Approval - Memorandum of Points and Authorities seeking 33.33% in Attorney's Fees.	2.7	300	810
Brick v. California Hydronics	6/17/25	Hourly time entry	Unbilled	Noah Adams	(PCD .5) Prepared and drafted portion within Motion for Final Approval - Memorandum of Points and Authorities seeking 33.33% in Attorney's Fees.	-0.5	300	-150
Brick v. California Hydronics	6/18/25	Hourly time entry	Unbilled	Noah Adams	(PCD 1) Prepared and drafted Motion for Final Approval - Memorandum of Points and Authorities (finished Attorney's Fees Section, and finished formatting and table of contents and authorities)	4.9	300	1470
Brick v. California Hydronics	6/18/25	Hourly time entry	Unbilled	Noah Adams	(PCD 1) Prepared and drafted Motion for Final Approval - Memorandum of Points and Authorities (finished Attorney's Fees Section, and finished formatting and table of contents and authorities)	-1	300	-300
Brick v. California Hydronics	6/18/25	Hourly time entry	Unbilled	Noah Adams	(PCD .2) Began preparing for the drafting of the Motion for Final Approval - Declaration of Attorney Nevels.	0.2	300	60
Brick v. California Hydronics	6/18/25	Hourly time entry	Unbilled	Noah Adams	(PCD .2) Began preparing for the drafting of the Motion for Final Approval - Declaration of Attorney Nevels.	-0.2	300	-60
Brick v. California Hydronics	6/19/25	Hourly time entry	Unbilled	Noah Adams	Prepared and drafted Motion for Final Approval - Declaration of Nevels.	2	300	600
Brick v. California Hydronics	6/19/25	Hourly time entry	Unbilled	Noah Adams	Revised Motion for Final Approval - Memorandum of Points and Authorities.	3	300	900
Brick v. California Hydronics	6/19/25	Hourly time entry	Unbilled	Noah Adams	(PCD .3) Prepared and drafted Motion for Final Approval - Declaration of Nevels.	1.6	300	480
Brick v. California Hydronics	6/19/25	Hourly time entry	Unbilled	Noah Adams	(PCD .3) Prepared and drafted Motion for Final Approval - Declaration of Nevels.	-0.3	300	-90
Brick v. California Hydronics	6/26/25	Hourly time entry	Unbilled	Noah Adams	(PCD .3) Drafted Motion for Final Approval - Declaration of Attorney BBN.	1	300	300
Brick v. California Hydronics	6/26/25	Hourly time entry	Unbilled	Noah Adams	(PCD .3) Drafted Motion for Final Approval - Declaration of Attorney BBN.	-0.3	300	-90
Brick v. California Hydronics	6/27/25	Hourly time entry	Unbilled	Noah Adams	(PCD .5) Completed draft of Motion for Final Approval - Declaration of Attorney BBN.	2.1	300	630
Brick v. California Hydronics	6/27/25	Hourly time entry	Unbilled	Noah Adams	(PCD .5) Completed draft of Motion for Final Approval - Declaration of Attorney BBN.	-0.5	300	-150
Brick v. California Hydronics	7/30/25	Hourly time entry	Unbilled	Noah Adams	Internal correspondence between Law Clerk NPA and Legal Assistant MSI re scheduling hearing for Motion for Preliminary Approval.	0.1	300	30
Brick v. California Hydronics	7/30/25	Hourly time entry	Unbilled	Noah Adams	Telephonic correspondence between Law Clerk NPA and Phoenix Settlement Administrators re request for Declaration. Drafted caption page for Phoenix Settlement Administrators Declaration. Drafted correspondence to Phoenix Settlement Administrators re caption page for Declaration.	0.3	300	90
Brick v. California Hydronics	7/30/25	Hourly time entry	Unbilled	Noah Adams	Drafted correspondence to Co-Counsel re Request for Declaration in support of Motion for Final Approval.	0.1	300	30
Brick v. California Hydronics	7/30/25	Hourly time entry	Unbilled	Noah Adams	Reviewed Declaration of Phoenix Administrators. File saved Declaration to Client file. Internal correspondence between Attorney CEN and Law Clerk NPA re Declaration of Phoenix Administrators.	0.2	300	60
Brick v. California Hydronics	7/30/25	Hourly time entry	Unbilled	Noah Adams	Drafted correspondence to Webb Law Group re request for review of Phoenix Declaration. Drafted correspondence to Phoenix re request to finalize declaration.	0.2	300	60
Brick v. California Hydronics	7/30/25	Hourly time entry	Unbilled	Noah Adams	Reviewed finalized Declaration of Phoenix. File saved Declaration to Client file.	0.2	300	60
Brick v. California Hydronics	7/31/25	Hourly time entry	Unbilled	Noah Adams	(PCD .1) Reviewed correspondence from Co-Counsel.	0.1	300	30
Brick v. California Hydronics	7/31/25	Hourly time entry	Unbilled	Noah Adams	(PCD .1) Reviewed correspondence from Co-Counsel.	-0.1	300	-30
Brick v. California Hydronics	7/31/25	Hourly time entry	Unbilled	Noah Adams	(PCD .1) Drafted correspondence between Attorney BBN, Attorney CEN, and Law Clerk NPA re internal reminder to review Motion for Final Approval.	0.1	300	30
Brick v. California Hydronics	7/31/25	Hourly time entry	Unbilled	Noah Adams	(PCD .1) Drafted correspondence between Attorney BBN, Attorney CEN, and Law Clerk NPA re internal reminder to review Motion for Final Approval.	-0.1	300	-30
Brick v. California Hydronics	8/1/25	Hourly time entry	Unbilled	Noah Adams	Internal correspondence between Attorney CEN and Law Clerk NPA re adding reservation number to Motion for Final Approval. Revised Motion for Final Approval to reflect reservation number.	0.2	300	60
Brick v. California Hydronics	8/1/25	Hourly time entry	Unbilled	Noah Adams	(PCD .1) Reviewed correspondence between Attorney CEN and Webb Law Group re request for Declaration for Motion for Final Approval.	0.1	300	30
Brick v. California Hydronics	8/1/25	Hourly time entry	Unbilled	Noah Adams	(PCD .1) Reviewed correspondence between Attorney CEN and Webb Law Group re request for Declaration for Motion for Final Approval.	-0.1	300	-30
Brick v. California Hydronics	8/1/25	Hourly time entry	Unbilled	Noah Adams	Internal correspondence between Law Clerk NPA and Co-Counsel re Caption page for the Declaration in support of the Motion for Final Approval. Drafted Caption page.	0.3	300	90
Brick v. California Hydronics	8/1/25	Hourly time entry	Unbilled	Noah Adams	Receipt and reviewed Declaration of KRN in support of Motion for Final Approval.	0.3	300	90
Brick v. California Hydronics	8/1/25	Hourly time entry	Unbilled	Noah Adams	(PCD .3) Reviewed Declaration of KRN in support of Motion for Final Approval.	0.3	300	90
Brick v. California Hydronics	8/1/25	Hourly time entry	Unbilled	Noah Adams	(PCD .3) Reviewed Declaration of KRN in support of Motion for Final Approval.	-0.3	300	-90
Brick v. California Hydronics	8/4/25	Hourly time entry	Unbilled	Noah Adams	Reviewed Motion for Final Approval - Declaration of Webb. Saved Declaration to Client file.	0.2	300	60
Brick v. California Hydronics	8/4/25	Hourly time entry	Unbilled	Noah Adams	Office conference between Attorney CEN, Law Clerk AMR and NPA regarding motion for final approval.	0.2	300	60
Brick v. California Hydronics	8/4/25	Hourly time entry	Unbilled	Noah Adams	(PCD .1) Reviewed correspondence between Attorney CEN and Co-Counsel. Revised Declaration of Nevels in support of Motion for Final Approval.	0.5	300	150
Brick v. California Hydronics	8/4/25	Hourly time entry	Unbilled	Noah Adams	(PCD .1) Reviewed correspondence between Attorney CEN and Co-Counsel. Revised Declaration of Nevels in support of Motion for Final Approval.	-0.1	300	-30
Brick v. California Hydronics	11/27/24	Hourly time entry	Unbilled	Raha Razavi	(PCD .1) Filed and served Joint Case Management Conference Statement.	0.3	275	82.5
Brick v. California Hydronics	11/27/24	Hourly time entry	Unbilled	Raha Razavi	(PCD .1) Filed and served Joint Case Management Conference Statement.	-0.1	275	-27.5
Brick v. California Hydronics	12/3/24	Hourly time entry	Unbilled	Raha Razavi	File saved Joint Case Management Statement to reflect updated filing status and Notice of E-Filing Confirmation.	0.1	275	27.5
Brick v. California Hydronics	12/4/24	Hourly time entry	Unbilled	Raha Razavi	Updated Motion for Preliminary Approval/CMC hearing date and relevant details.	0.2	275	55
Brick v. California Hydronics	12/5/24	Hourly time entry	Unbilled	Raha Razavi	Checked court Register of Actions for updated Case Management Conference/Motion for Preliminary Approval hearing date, file saved Tentative Ruling and updated firm calendar to reflect updated hearing date and time with relevant reminders.	0.2	275	55
Brick v. California Hydronics	12/11/24	Hourly time entry	Unbilled	Raha Razavi	Phone calls with CPT Group and Phoenix Class Action re requesting quote for settlement.	0.2	275	55
Brick v. California Hydronics	12/12/24	Hourly time entry	Unbilled	Raha Razavi	Sent quote request for settlement via email to Phoenix Class Actions.	0.2	275	55
Brick v. California Hydronics	1/8/25	Hourly time entry	Unbilled	Raha Razavi	Receipt and review of Final Class Action Settlement Agreement.	0.1	275	27.5
Brick v. California Hydronics	1/15/25	Hourly time entry	Unbilled	Raha Razavi	File saved fully executed Class Action and PGA Settlement Agreement.	0.1	275	27.5
Brick v. California Hydronics	1/16/25	Hourly time entry	Unbilled	Raha Razavi	(PCD .1) Confirmed Attorney CEN entry of deadline to file motion on firm calendar.	0.1	275	27.5

Brick v. California Hydronics	1/16/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Confirmed Attorney CEN entry of deadline to file motion on firm calendar.	-0.1	275	-27.5
Brick v. California Hydronics	1/22/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Conveyed date, time and department number for Hearing on Motion for Preliminary Approval to Attorney BBN.	-0.1	275	-27.5
Brick v. California Hydronics	1/22/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Conveyed date, time and department number for Hearing on Motion for Preliminary Approval to Attorney BBN.	-0.1	275	-27.5
Brick v. California Hydronics	1/23/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Updated deadline to file Motion for Preliminary Approval on firm calendar.	-0.1	275	-27.5
Brick v. California Hydronics	1/23/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Updated deadline to file Motion for Preliminary Approval on firm calendar.	-0.1	275	-27.5
Brick v. California Hydronics	1/27/25	Hourly time entry	Unbilled	Raha Razavi	File saved signed Motion for Preliminary Approval - Declaration of Brick.	-0.1	275	-27.5
Brick v. California Hydronics	1/29/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Added reminder for Legal Assistant RAH to file and serve Motion for Preliminary Approval.	-0.1	275	-27.5
Brick v. California Hydronics	1/29/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Added reminder for Legal Assistant RAH to file and serve Motion for Preliminary Approval.	-0.1	275	-27.5
Brick v. California Hydronics	1/29/25	Hourly time entry	Unbilled	Raha Razavi	Added Hearing on Motion for Preliminary Approval to firm calendar as court rule.	-0.1	275	-27.5
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Raha Razavi	Exchange of internal memoranda with Attorney BBN and Attorney CEN re service of Motion for Preliminary Approval.	-0.1	275	-27.5
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Raha Razavi	Office conference with Attorney CEN and Legal Assistant RAH re filing and service of Motion for Preliminary Approval.	-0.1	275	-27.5
Brick v. California Hydronics	1/30/25	Hourly time entry	Unbilled	Raha Razavi	Prepared, filed, and served 8 documents related to Motion for Preliminary Approval: Declaration of Nevels, Declaration of Webb, Declaration of KRN, Declaration of Lawrence, Declaration of Brick, Notice, Memorandum of Points and Authorities, and Proposed Order.	0.8	275	220
Brick v. California Hydronics	2/3/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Exchange of internal memoranda between Legal Assistant RAH and Attorney CEN re re-filing Motion for Preliminary Approval.	0.2	275	55
Brick v. California Hydronics	2/3/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Exchange of internal memoranda between Legal Assistant RAH and Attorney CEN re re-filing Motion for Preliminary Approval.	-0.1	275	-27.5
Brick v. California Hydronics	2/4/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -2) Call to Alameda Superior Court re Motion for Preliminary Approval hearing setting.	0.2	275	55
Brick v. California Hydronics	2/4/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -2) Call to Alameda Superior Court re Motion for Preliminary Approval hearing setting.	-0.2	275	-55
Brick v. California Hydronics	2/4/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -2) Call to Alameda Superior Court re Motion for Preliminary Approval.	0.2	275	55
Brick v. California Hydronics	2/4/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -2) Call to Alameda Superior Court re Motion for Preliminary Approval.	-0.2	275	-55
Brick v. California Hydronics	2/5/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Re-filed Motion for Preliminary Approval per receipt of court reservation number.	-0.1	275	-27.5
Brick v. California Hydronics	2/5/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Re-filed Motion for Preliminary Approval per receipt of court reservation number.	-0.1	275	-27.5
Brick v. California Hydronics	2/6/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Filed out Infortrack filing status notices in Outlook.	-0.1	275	-27.5
Brick v. California Hydronics	2/6/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Filed out Infortrack filing status notices in Outlook.	-0.1	275	-27.5
Brick v. California Hydronics	2/6/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) File saved 8 Motion for Preliminary Approval Documents to reflect accepted filing status.	0.2	275	55
Brick v. California Hydronics	2/6/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) File saved 8 Motion for Preliminary Approval Documents to reflect accepted filing status.	-0.1	275	-27.5
Brick v. California Hydronics	2/17/25	Hourly time entry	Unbilled	Raha Razavi	Call and correspondence to Fresno Superior Court Department 23 re remote appearance credentials.	0.2	275	55
Brick v. California Hydronics	2/18/25	Hourly time entry	Unbilled	Raha Razavi	Correspondence to Alameda Superior Court Department 23 re remote appearance credential access.	0.1	275	27.5
Brick v. California Hydronics	2/18/25	Hourly time entry	Unbilled	Raha Razavi	Receipt and review of correspondence from Alameda Superior Court re tentative ruling procedures and remote appearance credentials, memo to Attorney BBN and Attorney CEN of the same.	0.2	275	55
Brick v. California Hydronics	2/19/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Updated reminder to check tentative ruling for Hearing on Motion for Preliminary Approval.	0.1	275	27.5
Brick v. California Hydronics	2/19/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Updated reminder to check tentative ruling for Hearing on Motion for Preliminary Approval.	-0.1	275	-27.5
Brick v. California Hydronics	3/3/25	Hourly time entry	Unbilled	Raha Razavi	File saved Order re Motion for Preliminary Approval and added continued hearing date to firm calendar as court rule with relevant deadlines and reminders.	0.2	275	55
Brick v. California Hydronics	3/21/25	Hourly time entry	Unbilled	Raha Razavi	File saved Supplemental Declaration of Co-Counsel Webb to reflect accepted filing status.	0.1	275	27.5
Brick v. California Hydronics	3/31/25	Hourly time entry	Unbilled	Raha Razavi	Confirmed Signed Order on Motion for Preliminary Approval of Settlement, internal memo to Attorney CEN re the same.	0.1	275	27.5
Brick v. California Hydronics	3/31/25	Hourly time entry	Unbilled	Raha Razavi	Filed and served Notice of Change of Address.	0.1	275	27.5
Brick v. California Hydronics	4/2/25	Hourly time entry	Unbilled	Raha Razavi	File saved tentative ruling granting Motion for Preliminary Approval.	0.1	275	27.5
Brick v. California Hydronics	4/2/25	Hourly time entry	Unbilled	Raha Razavi	Added Final Approval Hearing and Continued Case Management Conference to firm calendar as court rules with relevant deadlines.	0.3	275	82.5
Brick v. California Hydronics	4/3/25	Hourly time entry	Unbilled	Raha Razavi	File saved Notice of Change of Address to reflect accepted filing status.	0.1	275	27.5
Brick v. California Hydronics	4/9/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Added deadline to confirm receipt of Phoenix Class Action Administration Solutions Declaration re Preliminary Approval.	0.1	275	27.5
Brick v. California Hydronics	4/9/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Added deadline to confirm receipt of Phoenix Class Action Administration Solutions Declaration re Preliminary Approval.	-0.1	275	-27.5
Brick v. California Hydronics	5/22/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Receipt of internal memoranda from Attorney BBN and Attorney CEN re saving weekly status reports from Phoenix Class Action Administration.	0.1	275	27.5
Brick v. California Hydronics	5/22/25	Hourly time entry	Unbilled	Raha Razavi	(PCD -1) Receipt of internal memoranda from Attorney BBN and Attorney CEN re saving weekly status reports from Phoenix Class Action Administration.	-0.1	275	-27.5
Brick v. California Hydronics	5/22/25	Hourly time entry	Unbilled	Raha Razavi	File saved Phoenix Correspondence from 2025 05 May 16 re Weekly Case Status Report.	0.1	275	27.5
Brick v. California Hydronics	5/22/25	Hourly time entry	Unbilled	Raha Razavi	File saved Phoenix Correspondence from 2025 05 May 09 re Weekly Case Status Report.	0.1	275	27.5
					File saved 2025 05 May 16 Weekly Case Status Report.			
Brick v. California Hydronics	5/27/25	Hourly time entry	Unbilled	Raha Razavi	Clio > Cal Hydronics > Correspondence	0.1	275	27.5
Brick v. California Hydronics	6/9/25	Hourly time entry	Unbilled	Raha Razavi	File saved Phoenix Correspondence from 2025 06 June 06 re Weekly Case Status Report.	0.1	275	27.5
Brick v. California Hydronics	6/16/25	Hourly time entry	Unbilled	Raha Razavi	File saved 06/13/25 Weekly Report from Phoenix Class Settlement company.	0.1	275	27.5
Brick v. California Hydronics	6/23/25	Hourly time entry	Unbilled	Raha Razavi	File saved Weekly Report for 06/20/25.	0.1	275	27.5
Brick v. California Hydronics	6/30/25	Hourly time entry	Unbilled	Raha Razavi	File saved Weekly Report for 06/27/25 from Phoenix Class Action Administration.	0.1	275	27.5
Brick v. California Hydronics	7/7/25	Hourly time entry	Unbilled	Raha Razavi	File saved correspondence from Phoenix Class Action Administration regarding Weekly Case Status Report for 07/02/25.	0.1	275	27.5
Brick v. California Hydronics	1/23/25	Hourly time entry	Unbilled	Shelby Durham	(PCD 0.3) Draft the Notice to accompany the Motion for Preliminary Approval of Class and PAGA Settlement.	0.5	300	150
Brick v. California Hydronics	1/23/25	Hourly time entry	Unbilled	Shelby Durham	(PCD 0.3) Draft the Notice to accompany the Motion for Preliminary Approval of Class and PAGA Settlement.	-0.3	300	-90
Brick v. California Hydronics	1/23/25	Hourly time entry	Unbilled	Shelby Durham	Draft the Proposed Order in support of the Motion for Preliminary Approval of Class Settlement.	0.5	300	150
Brick v. California Hydronics	1/23/25	Hourly time entry	Unbilled	Shelby Durham	(PCD 0.6) Continue to draft Proposed Order in support of the Motion for Preliminary Approval.	0.8	300	240
Brick v. California Hydronics	1/23/25	Hourly time entry	Unbilled	Shelby Durham	(PCD 0.6) Continue to draft Proposed Order in support of the Motion for Preliminary Approval.	-0.6	300	-180
Brick v. California Hydronics	3/25/25	Hourly time entry	Unbilled	Shelby Durham	Draft the Notice of Change of Address of Counsel	0.2	300	60
Brick v. California Hydronics	3/25/25	Hourly time entry	Unbilled	Shelby Durham	Update Proof of Service to reflect N&N's change of address	0.2	300	60
						123.4		78725.00
Brick v. California Hydronics	6/13/24	Expense entry	Unbilled	Brooke Nevels	Mediation 1/2 fee split. Invoice number 632148.	1	4187.5	4187.5
Brick v. California Hydronics	4/23/24	Expense entry	Unbilled	Christopher Nichols	CA: File To Existing - #24AA00101032 - BRICK vs CALIFORNIA HYDRONICS CORPORATION: Case Management Statement (1 filing)	1	21.9	21.9
Brick v. California Hydronics	6/10/24	Expense entry	Unbilled	Christopher Nichols	Flight cost to return from SFO to SAN regarding mediation.	1	196.2	196.2
Brick v. California Hydronics	6/10/24	Expense entry	Unbilled	Christopher Nichols	Flight cost to fly from SAN to SFO for mediation.	1	276	276
Brick v. California Hydronics	7/23/24	Expense entry	Unbilled	Christopher Nichols	CA: File To Existing - #25AA00181653 - BRICK vs CALIFORNIA HYDRONICS CORPORATION: Case Management Statement (1 filing)	1	21.9	21.9
Brick v. California Hydronics	3/21/25	Expense entry	Unbilled	Christopher Nichols	CA: File To Existing - #25AA00068339 - BRICK vs CALIFORNIA HYDRONICS CORPORATION: Declaration (name extension) (2 filings)	1	25.45	25.45
Brick v. California Hydronics	12/3/24	Expense entry	Unbilled	Raha Razavi	CA: File To Existing - #25AA00292149 - BRICK vs CALIFORNIA HYDRONICS CORPORATION: Case Management Statement (1 filing)	1	23.45	23.45
Brick v. California Hydronics	2/6/25	Expense entry	Unbilled	Raha Razavi	CA: File To Existing - #25AA00030775 - BRICK vs CALIFORNIA HY. - Motion for Preliminary Approval of Settlement (8 filings)	1	85.45	85.45
Brick v. California Hydronics	4/2/25	Expense entry	Unbilled	Raha Razavi	CA: File To Existing - #25AA00078429 - BRICK vs CALIFORNIA HYDRONICS CORP. - Notice of Change of Firm Address (1 filing)	1	25.45	25.45
								4863.30

PROOF OF SERVICE

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

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

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

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

Mark L. Jacuzzi (SBN 173220)
Sarah E. Lucas (SBN 148713)
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JACUZZI PC**
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Attorneys for Plaintiff

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

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

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4 _____
5 NOAH ADAMS
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