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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF ORANGE**
12

13 JEFFREY YOUNG, individually, and on behalf
of all aggrieved employees pursuant to the Private
14 Attorneys General Act ("PAGA"),
15 Plaintiff,
16 vs.
17 REFINED TECHNOLOGIES, INC., and DOES 1
through 100, inclusive,
18 Defendants.
19

Case No. 30-2022-01279468-CU-OE-CXC

Assigned for all purposes to:
Hon. William Claster
Dept. CX-101

**DECLARATION OF CHRIS C.
SCHEITHAUER IN SUPPORT OF
PLAINTIFF'S MOTION TO APPROVE
PAGA SETTLEMENT**

RESERVATION NO. 74511970

Date: Continued to June 13, 2025
Time: 9:00 A.M.
Dept: CX101

Complaint Filed: September 6, 2022

DECLARATION OF CHRIS C. SCHEITHAUER

I, Chris C. Scheithauer, declare:

1. I am a Shareholder at Call & Jensen, APC, attorneys for Plaintiff Jeffrey Young (“Plaintiff” or “Young”), in the above-entitled matter. I am duly licensed to practice law in all the state and federal courts in the State of California. I have personal knowledge of the facts set forth herein or knowledge of such facts based upon my review of the books and records of Call & Jensen, APC (“Call & Jensen”) kept in the ordinary course of business. If called upon to do so, I could and would testify competently thereto.

2. I submit this declaration in further support of Plaintiff’s Motion for PAGA Settlement Approval (“Motion”). This declaration supplements the prior declaration submitted by Travis A. Beck in support of the Motion with the primary purpose of this supplemental declaration to respond to the Court’s questions raised in its Minute Order dated April 22, 2025 (“Minute Order”), wherein the Court asked for additional information and the submission of some additional documents.

3. The “Settlement” refers to the PAGA Settlement Agreement executed by the parties, a true and correct copy of which is attached to the previously filed Declaration of Travis Beck in Support of Plaintiff’s Motion to Approve PAGA Settlement (ROA #144, Exh. A). Per the Settlement, the Parties have agreed that there are 115 Aggrieved Employees covered by the settlement and the list of the employees attached to the Settlement Agreement constitutes the persons covered. RTI has represented that there are 2,199 pay periods at issue for those 115 Aggrieved Employees.

Additional Factual Background

4. Refined Technology, Inc., (“RTI” or “Defendant”) is headquartered in Texas, although it has offices and operations across the country, including an operational presence in California. Defendant is a third-party contractor that provides chemical cleaning and mechanical rental services to entities including but not limited to petroleum refineries and chemical manufacturing industries.

5. Plaintiff Young alleges that he and the Aggrieved Employees worked for Defendant RTI in California between August 1, 2021, to February 28, 2025 (the “PAGA Period”), as Operations Managers, Hydroprocessing Specialists, Mechanical Planner and similar roles, that were ascertained through discovery.

6. In this case, Plaintiff Young alleged that he previously worked for years in the oil refinery process unit operations industry with various companies, including Chevron, where he learned about the methods and procedures for cleaning process units in refineries including vapor phase cleaning and chemical cleaning. Plaintiff Young further alleged that eventually he was lured to the contractor side of the business and interviewed with Defendant RTI in their Concord, California office and a second interview in the Carson, California office. On or around November 3, 2017, Young became employed by RTI. Plaintiff Young resides in Vacaville, California, and he worked primarily in California during his employment with RTI. He was employed as an “Operations Manager” for RTI. Young worked in an operational role cleaning process units in refineries. Young was not involved in sales and did not have responsibility for pricing. Young did not solicit business. Young was not responsible for determining the chemicals RTI used to clean units. Plaintiff Young further alleged that while Young’s job was titled “Operations Manager” – he really did not “manage” anything or anyone. When a company hired RTI to come in and do cleaning of units in refineries, a group of persons initially “planned” the job. Various person with titles of “Operations Managers” were involved. RTI had books and binders explaining how the planning process would take place. The planning process included walking the job, preparing diagrams of what needed to be cleaned, the processes and chemicals that would be used, and the order in which various valves would be shut down and chemicals added, etc. Young may have been involved in the “planning” phase for new jobs over multiple months – all while also engaged in various other jobs in various stages. During the “execution” phase, Young and others would actually be on site doing the job – i.e., turning off valves, putting chemicals into pipes, and otherwise “cleaning” the unit at a refinery that RTI was hired to clean. Because of the various “planning” phases for multiple projects and lead times for execution phases, Young could be involved in various projects at one time. Generally, however, once an execution phase started, Young and other employees would be on site doing the cleaning execution for weeks straight – often working long days (12 to 16 hours) with no days off.

7. Plaintiff Young further alleged in this case that notwithstanding that Young supervised nobody, had no discretion in the hiring or firing of anyone else, and had very little (if any) discretion in how the job was performed, and was heavily involved in manual labor (turning on/off valves,

1 putting chemicals into pipes, monitoring the cleaning process and pipe pressures, etc.), RTI classified
2 Young as “exempt” – meaning that they paid him a salary regardless of how many hours or days he
3 worked. Young alleges that he was misclassified and should have been an hourly employee – along
4 with many other categories of Aggrieved Employees. Many other employees suffered the same fate as
5 Young. Indeed, it is common in the industry for refinery workers (except maybe upper-management)
6 to all be hourly non-exempt workers. For some reason, RTI took a different approach – almost all its
7 employees were (wrongly) classified as salaried exempt workers. Shortly before he left RTI, Young
8 transitioned to the position of Hydroprocessing Specialist. The position was not materially different
9 for purposes of this case. He still helped plan and execute cleanings at refineries.

10 8. Plaintiff Young further alleged that a few months before he resigned RTI required him
11 to sign a document entitled “Non-Solicitation Agreement: California Employees” (the “NSA”). RTI
12 was insistent, and repeatedly demanded that he sign the NSA. When Young did not immediately return
13 the signed NSA, representatives of RTI pestered Young to return it, and indicated that he would not
14 receive the bonus he had been working for all year unless and until it was signed and returned. Young
15 also understood from RTI’s comments and behavior that he had to sign the NSA to keep his job. He
16 felt that RTI was badgering him to sign the NSA, and that the terms of the agreement were not
17 negotiable. Young was not represented by legal counsel in connection with signing the NSA. He
18 understands the NSA contains a “non-compete” provision that purports to prevent him from working
19 for a competitor of RTI after termination of his employment. The NSA also contains “choice of law”
20 and “choice of venue” provisions purporting to choose Texas law to govern the contract, and requiring
21 claims to be arbitrated in Texas (in a transparent attempt to get around California’s ban on non-
22 compete agreements). Young further alleged that he was also forced to sign an arbitration agreement
23 that contains a similar “choice of law” and “choice of venue” provision – all in violation of California
24 Labor Code § 925.

25 9. Young alleged that RTI’s behavior toward him was a factor in his decision to leave RTI
26 and accept a job at another competitor in California. Young resigned from RTI effective April 7, 2022.

Procedural History Of Related Cases And Settlement Of Arbitration Case

10. This PAGA lawsuit was one of a series of actions involving Young and RTI after Young resigned from RTI and went work for a competitor. Young alleges that, as a matter of corporate policy, RTI refuses to allow former employees to work for its competitors by trying to utilize the NSA and related agreements to prevent employees from working for a competitor and using the illegal choice of law and forum selection to sue them in Texas to avoid California’s prohibitions on non-competes and non-California choice of law provisions for California workers. In this case, Young alleges that RTI was incensed that he resigned from RTI and went to work for a competitor in California where RTI was trying to gain a larger foothold and RTI promised to “bankrupt” him through lawsuits, and to “destroy” him.

11. Accordingly, following his resignation from RTI and in response to RTI trying to prevent him from working for a competitor and threats, Young filed a lawsuit seeking declaratory relief against RTI on April 7, 2022 in the Superior Court of California, Case No. 30-2022-01253844-CU-MD-CJC, which RTI removed to the United States District Court for the Central District of California, Case No. 8:22-cv-01032 (“First Lawsuit”). The primary purpose of that First Lawsuit was to obtain a declaration from the court that Young was entitled to work for a competitor of RTI in California and that various provisions within his NSA were not enforceable. Ultimately, the district court compelled that case to arbitration.

12. On April 11, 2022 (within 4 days of Young seeking declaratory relief on the NSA), RTI filed an emergency petition and application for a temporary restraining order (“TRO”) in Harris County, Texas, Case No. 2022-21643 (“Texas Case”). Through the Texas Case, RTI sought to prevent Young from working in California – essentially trying to enforce by way of a TRO the very same NSA that Young had filed the declaratory relief on in California days earlier. Following various motion practice in Texas, the Court dismissed the Texas Case.

13. Per order from the First Lawsuit, Young commenced his declaratory relief claim with AAA on July 20, 2022 (“Arbitration”). The original arbitration case was a simple declaratory relief claim by Young against RTI seeking to permit Young to work in California and find that certain provisions in his NSA were unenforceable. However, RTI upped the ante by counterclaiming against

1 Young in arbitration seeking damages of “\$250,000 or more” against Young for such things as breach
2 of contract, breach of fiduciary duty, theft of trade secrets, tortious interference, and various other
3 specious claims that Young alleges were solely made to try to intimidate him and send a message to
4 any other RTI that “dare” to leave RTI to work for a competitor.

5 14. In response to RTI seeking damages through its counterclaim in the Arbitration case,
6 Young then filed a series of amendments in his simple declaratory relief claim in arbitration which had
7 the collective impact of Young seeking individual damages and penalties for a variety of labor code
8 violations, such as unpaid wages and various related claims.

9 15. Additionally, in September 2022, Young filed his original Complaint in this case,
10 Orange County Superior Court, Case No. 30-2022-01279468-CU-OE-CXC, which ultimately involved
11 various amended complaints (“PAGA Case”) before the parties reached the settlement at issue on this
12 Motion.

13 16. In mid-2023, RTI finally agreed to fully settle the arbitration proceeding by paying
14 Young some money (which barely covered his attorneys’ fees for the state/federal cases). Young was
15 thus deprived of any meaningful recovery, but he did get his attorneys’ fees paid for First Lawsuit,
16 Texas Case, and Arbitration and RTI agreed to dismiss all its claims and agreed that it would not try to
17 enforce the NSA as to Young. That settlement expressly did not resolve the PAGA case, which is
18 wholly separate and which is the subject of this case. In its April 22, 2025 Minute Order, this Court
19 has asked for a copy of that individual settlement from the arbitration “to evaluate the fairness of the
20 PAGA settlement.” RTI wishes to keep the details private and out of the public domain. Thus, in
21 accordance with the Court’s Minute Order, a copy of that individual settlement from the Arbitration
22 case is being lodged with the Court by RTI, but not publicly filed.

23 **Discovery Obtained In The PAGA Case**

24 17. During the course of the PAGA Case, the Parties exchanged a large number of
25 documents in discovery. RTI took the position that virtually every document it produced in the
26 Arbitration had to be returned and not utilized at all in the PAGA Case. That forced Young to
27 essentially start over conducting discovery – sending out new document requests, engaging in the meet
28 and confer process about documents that RTI declined to reproduce – but which Young’s counsel

1 already knew existed and were relevant. As this Court is aware, the Parties held multiple informal
2 discovery conferences with the Court about various discovery disputes in this PAGA Case.

3 18. Ultimately, in the PAGA Case, RTI produced over 26,447 pages, including, without
4 limitation, the following categories: (a) identities and contact information of RTI employees that
5 performed work in California during the relevant PAGA period; (b) Non-Solicitation Agreements
6 (NSA) signed by the relevant employees, including multiple versions such as “revisions” made in
7 response to this litigation, (c) various personnel file documents for each of RTI employees who
8 performed work in California (such as handbook acknowledgement, arbitration agreements, various
9 restrictive covenant agreements); (d) emails to various RTI employees in California regarding the
10 policies at issue in this litigation; (e) corporate policies applicable to employees working in California,
11 such as handbooks, travel and expense reimbursement policies, employment/contractor agreements; (f)
12 job descriptions for all RTI employees who performed work in California; (g) paystubs and timesheets
13 for Young for the PAGA period; (h) paystubs and timesheets for all employees that worked in
14 California for the PAGA period (not just a sampling); (i) Fatigue Management data for the employees
15 that performed work in California (j) arbitration agreements signed by all California based employees
16 (K); documents detailing the locations where RTI employees worked in California; (l) expense reports
17 submitted by California employees; and (m) various other documents.

18 19. Additionally, the Parties engaged in multiple rounds of written discovery, involving
19 Requests for Admission, Form Interrogatories, Requests for Production (Four Sets), Special
20 Interrogatories (Four Sets), and supplemental discovery requests. Almost all written discovery requests
21 required lengthy meet and confer exchanges (letters, emails telephonic conferences, and informal
22 discovery conferences) to resolve a multitude of outstanding disputes. Ultimately, I am satisfied that
23 we obtained sufficient discovery to evaluate the case and, if necessary, be prepared for trial.

24 20. Moreover, the Parties participated in eleven (11) extensive depositions of key witnesses
25 including but not limited to, Plaintiff Young, aggrieved employees, and various senior level executives
26 for Defendant RTI. The depositions allowed Plaintiff’s counsel to obtain a reasonable sampling of
27 testimony for various job titles, positions, time periods, and perspectives to demonstrate violations for
28 each position of Aggrieved Employee for trial. Had the matter not resolved, the Parties anticipated a

1 continued need for at least ten (10) more depositions – involving aggrieved employees, additional
2 RTI’s corporate persons, and the Parties’ expert witnesses.

3 21. In addition to formal discovery, Plaintiff Young’s counsel used the list of Aggrieved
4 Employees to reach out to most of the persons on the list, both in writing or by other means. That
5 outreach resulted in specific individuals being interviewed and providing informal testimony to
6 counsel. Some of them agreed to testify at trial against RTI and they provided additional
7 documentation that RTI had not already provided.

8 **Plaintiff’s Expert Witness Helped Obtain The Settlement**

9 22. In preparation for the mediation that ultimately resolved this case, and to potentially
10 testify at trial, counsel for Plaintiff Young retained the consulting services and expert witness services
11 of Deepak Goel, founder and Managing Partner at dlse Consulting LLC. Mr. Goel and his firm, dlse
12 Consulting LLC, is a well-known expert witness in class action and PAGA employment claims. Per
13 the Court’s request, attached hereto as **Exhibit A** is copy of Mr. Goel’s CV.

14 23. Mr. Goel analyzed a significant number of the records produced by RTI in this case,
15 including, without limitation, the payroll and timekeeping data in order to assist with damages models
16 that were utilized at mediation, as well as in anticipation of trial.

17 24. Mr. Goel’s expert services included detailed analysis the following:

18 a. Providing input and analysis on how to value count and determine the number
19 of instances of violations through RTI’s use of the NSA with California employees. The analysis was
20 utilized to determine the PAGA penalty exposure relating to the Labor Code § 925(a) violations.

21 b. Reviewing and analyzing the Fatigue Time utilized by each relevant employee
22 during the time period at issue. This analysis summarized, for each employee and by year, the fatigue
23 hours earned, fatigue hours utilized, and the fatigue hours forfeited. Based on this information, an
24 anticipated PAGA penalty exposure model was built relating to the allegations that RTI violated Labor
25 Code § 227.3 (forfeiture of vacation).

26 c. Reviewing and analyzing the alleged misclassifications of various employees
27 (both as independent contractors and as exempt versus non-exempt) to build a PAGA penalty exposure
28 model related to the allegations that RTI misclassified employees and in turn violated Labor Code §§

2275 and 226.8.

d. Reviewing and analyzing the time records and paystubs, including any meal periods recorded by employees and policies related thereto, to develop a PAGA penalty exposure model relating to the allegations that employees did not get proper meal periods and/or were not provided with meal premium pay in violation of Labor Code §§ 226.7 and 512.

e. Reviewing and analyzing the time records and paystubs, and rest break policies, to develop a PAGA penalty exposure model relating to the allegations that employees did not get proper rest breaks and/or were not provided with rest break premium pay in violation of Labor Code § 226.7.

f. Reviewing and analyzing time records, paystubs, deposition testimony and other evidence to develop a PAGA penalty exposure model relating to the allegations that employees were not paid minimum wage for all hours worked (such as alleged off-the-clock work, etc.) in violation of Labor Code §§ 1194, 1197, and 223.

g. Reviewing and analyzing time records, paystubs, deposition testimony and other evidence to develop a PAGA penalty exposure model relating to the allegations that employees were not paid all overtime wages earned (including, for example, misclassified employees who were not paid overtime wages even though their timesheets showed overtime worked) wage for all hours worked (such as alleged off-the-clock work, etc.) in violation of Labor Code §§ 510, 1197, and 223.

h. Reviewing and analyzing time records and other evidence to develop a PAGA penalty exposure model relating to the allegations that employees worked more than six days in a row without a day of rest in violation of Labor Code § 551 and 552.

i. Developing a PAGA penalty exposure model relating to the allegation that RTI violated Labor Code § 1174, 1174.5 and 1198 regarding recordkeeping.

j. Developing a PAGA penalty exposure model relating to the allegation that RTI violated Labor Code § 226 in failing to provide accurate itemized paystubs. For example, the expert utilized the number of paystubs at issue for employees that primarily lived and worked in California (as opposed to those merely performed some work in California) to provide a basis for recovering a penalty for inaccurate paystubs.

1 k. Developing a PAGA penalty exposure model for the allegations that RTI failed
2 to timely pay wages to employees during employment and also failed to properly pay terminated
3 employees waiting time pay earned at the termination of employment, in violation of Labor Code §§
4 201-203, 204, 216, and 223.

5 25. Parts of expert Goel's analysis, including various spreadsheet data, was shared with the
6 mediator and, in my opinion, was very helpful at the mediation to reach the result that was obtained.

7 26. Mr. Goel and his firm, dlse Consulting LLC, charged Call & Jensen \$25,638.72 for the
8 services they provided. A copy of the invoice for such services from dlse Consulting LLC is attached
9 hereto as **Exhibit B**.

10 **Assessing The Amount In Controversy And The Risks Of Trial**

11 **Claim 1: Improper Venue/Choice of Law In Violation of Labor Code § 925**

12 27. This first PAGA claim revolves around RTI forcing employees to sign both the Non-
13 Solicitation Agreements ("NSA") and Arbitration Agreement that allegedly contained unlawful
14 clauses in violation of Labor Code § 925. Young contends that in addition to containing an unlawful
15 non-compete, the NSA included an illegal venue and choice of law provisions. For example, Young
16 alleged that the NSA required: "all questions relating to its validity, interpretation, performance, and
17 inducement [are] to be governed by, construed, interpreted, and enforced in accordance with the
18 substantive laws of the State of Texas, excluding Texas choice-of-law principles." The NSA further
19 incorporated by reference the "Dispute Resolution & Arbitration Agreement contained in the RTI
20 Artisan Handbook," which requires all RTI employees to submit any disputes to arbitration in Texas,
21 governed by Texas law. Young alleged that (1) Section 12.2 of the NSA, and (2) the Dispute
22 Resolution and Arbitration Agreement, both illegally required California employees to adjudicate
23 outside of California claims arising in California, and also deprives California employees of the
24 protections of California Business & Professions Code § 16600—which broadly prohibits non-
25 competes of the type set forth in the NSA.

26 28. RTI argued in response that it "fixed" the problem by rolling out California compliant
27 agreements after the litigation commenced by requiring employees to actually retain individual
28 counsel to fit into Section 925's exception. Thus, RTI disputes the number of violations, even while it

1 clings to the same argument previously rejected by the district court. Young contends that interviews
2 of witnesses dispute the efficacy of this argument. RTI has also argued that even accounting for a
3 problem, it would not apply to all employees because some of the Aggrieved Employees did not reside
4 in California for the entire PAGA period and thus the number pay periods at issue on this claim would
5 be reduced even further.

6 29. Plaintiff argued that RTI is liable for the default civil penalty set forth in Labor Code §
7 2699(f) – namely, \$100 per aggrieved employee per pay period for each violation. Considering that the
8 problem occurred in multiple different agreements per person (NSA, Arbitration Agreement, etc.),
9 there could be multiple penalties per person stacked. Based on the 2199 pay periods (which may be
10 stacked per violating document) there could be as many as 4,398 pay periods at issue, or more. At the
11 \$100 rate per pay period, that alone could constitute PAGA penalties of \$439,800. In sum, Plaintiff
12 Young’s counsel remains very confident on prevailing on this claim – the only question is the amount
13 of penalties the Court would decide to award.

14 **Claim 2: Maintaining an Unlawful Policy Forfeiting Vested Vacation Pay in Violation**
15 **of Labor Code § 227.3**

16 30. This second PAGA claim involved California Labor Code § 227.3, which prohibits a
17 policy of forfeiture of accrued but unused vacation pay. In California, this is known as the prohibition
18 on “use it or lose it” policies. Plaintiff alleged that RTI had an “employment policy” providing for
19 “forfeiture” of accrued leave provided to employees. Plaintiff Young alleged that RTI maintains a
20 “Fatigue Management Allowance Policy.” Pursuant to the policy, employees who are required to work
21 on weekends receive a “fatigue management allowance” benefit, which allows them to take *paid time*
22 *off as extra compensation for weekend work*. Plaintiff further alleged that for purposes of California
23 law, “fatigue management allowances,” such as the one implemented by RTI, are equivalent to paid
24 vacation. RTI’s policy requires employees to forfeit unused fatigue management allowances at the end
25 of each calendar year, and RTI does not pay out vested benefits upon termination, as required by
26 Labor Code section 227.3. Young argue that such policy is exactly the type of “use it or lose it”
27 vacation policy expressly prohibited under California law. Here, the policy required forfeiture of
28 unused time, that California employees did, in fact, have such accrued fatigue time “forfeited” and that

1 their balances were “zeroed out” each January 1st. Based on the default civil penalty in Labor Code §
2 2699(f) of \$100 per aggrieved employee per pay period, the 2,199 pay periods could constitute PAGA
3 penalties of \$219,900.

4 31. RTI disputes that its fatigue allowance policy is equivalent to a prohibited use it or lose
5 it vacation policy. RTI further argues that this problem, if at all, only applies to a few employees
6 (around 5) that actually terminated employment and that current employees have no claim (and that
7 forfeitures during employment are not actionable). However, Plaintiff contends that California Court
8 of Appeal cases have interpreted *Brinker Rest. Corp. v. Super. Ct.* (2012) 53 Cal.4th 1004 as holding
9 that an employer’s liability flows simply from having a facially defective policy. *Benton v. Telecom*
10 *Network Specialists, Inc.* (2013) 220 Cal.App.4th 701, 726 (“the employer’s liability arises by
11 adopting a uniform policy that violates” the law). Thus, under Plaintiff’s view, it is irrelevant if
12 employees terminated or simply lost the extra time during continued employment. Plaintiff believes
13 the Aggrieved Employees have the better argument.

14 **Claim 3: Misclassification of Employees As Exempt or As Independent Contractors**
15 **(Labor Code §§ 2775, 226.8)**

16 32. This third PAGA claim alleged that RTI engaged individuals in California to work on
17 projects, and willfully misclassified them as independent contractors or as exempt when they should
18 have been classified as non-exempt employees. Plaintiff alleged that virtually all employees working
19 for RTI in California were treated as either an “independent contractor” or as “exempt” regardless of
20 what they did or whether they fit any exempt classification. For example, employees given the title of
21 “Operations Manager” were classified as exempt, but employees with that title did not spend the
22 majority of their time on exempt management tasks and did not fit any exemption.

23 33. RTI contended that it properly classified the workers – particularly those classified as
24 exempt. RTI presented evidence that some of the workers (particularly those in higher levels) spent
25 significant time “planning” jobs as opposed to “executing” jobs and the emphasis in “planning”
26 bumped those employees to exempt status. Many depositions focused on this issue. Based on the
27 default civil penalty in Labor Code § 2699(f) of \$100 per aggrieved employee per pay period, the
28 2,199 pay periods could constitute PAGA penalties of \$219,900.

1 **Claim 4: Failure to Provide Legally Complaint Meal Period/Premium Pay for**
2 **Missed/Late/Short Meal Periods (§§ 512 and 226.7)**

3 34. This fourth PAGA claim alleged that Aggrieved Employees working in California
4 (including those who were misclassified as exempt as well as those classified as non-exempt) worked
5 shifts during which they were entitled to one or more uninterrupted thirty minute meal periods as
6 required by Labor Code Sections 226.7, 512 and applicable IWC Wage Orders, which RTI failed to
7 provide. Plaintiff alleged that RTI employees working in California regularly worked long shifts—
8 often twelve to sixteen hours or more in a day (and often for weeks at length without any day off).
9 While Employees were permitted to eat food during the workday, they were not given **uninterrupted**
10 off duty meal periods as required by law or timely meal periods per law.

11 35. Plaintiff Young contends that deposition testimony from various employees
12 demonstrated the following key points:

- 13 • Employees were not trained on California meal period requirements;
- 14 • Employees were never told what their meal period parameters were (i.e., never told
15 they were entitled 30 minutes for a first meal period and 30 minutes additional if they
16 worked more than 10 hours, etc.);
- 17 • Employees almost never took at least a 30 minute meal period;
- 18 • Employees never took a second meal period (even though they regularly worked more
19 than 10 hours);
- 20 • Employees never were fully relieved of duties when on site at a refinery doing an
21 execution phase because they were required by policy to always be on-call:
 - 22 ○ They were required to continuously watch valves, pressures, cleaning status,
23 etc.;
 - 24 ○ They were required to carry a walkie-talkie and answer any issues that would
25 come up;
 - 26 ○ They were not permitted to leave the facility while an execution was in progress
27 in case an issue came up; and
- 28 • No records were kept of any meal periods (no clock out/clock in)

29 36. Plaintiff alleged that Employees never received proper meal periods for the reasons
30 stated above and for the obvious fact that RTI did not even think they were entitled to meal periods
31 under California law (they were misclassified as exempt). Based on the default civil penalty in Labor
32 Code § 2699(f) of \$100 per aggrieved employee per pay period, the 2,199 pay periods could constitute
33 PAGA penalties of \$219,900.

1 **Claim 5: Failure to Provide Compliant Rest Breaks/Premium Pay for**
2 **Missed/Late/Short Breaks (§§ 512 and 226.7)**

3 37. This fifth PAGA claim relating to failure to provide proper rest breaks is based on
4 similar facts to the meal period claim. Simply put, there was no policy, no training, no tracking, and
5 no communication at all regarding rest breaks. Plaintiff alleged non-exempt employees never received
6 proper rest breaks because they were never provided an uninterrupted rest break for each four hour
7 period of work, or major fraction thereof. Employees had to be on-call and carry a walkie talkie during
8 an entire shift on a refinery, which, by definition, means that no rest breaks were provided. Like the
9 meal period claim, this really comes down to whether employees were misclassified. If so, then every
10 pay period had a violation. But if RTI is right that employees were not misclassified, then there would
11 be no violations because the claim does not apply to properly exempt employees. Based on the default
12 civil penalty in Labor Code § 2699(f) of \$100 per aggrieved employee per pay period, the 2,199 pay
13 periods could constitute PAGA penalties of \$219,900.

14 **Claim 6: Failure to Pay Minimum Wages and Overtime/Failure to Compensate for all**
15 **Hours Worked in Violation of Labor Code §§ 510, 223, 1194, 1197, and 1199**

16 38. This sixth PAGA claim alleged that RTI's failure to properly classify refinery workers
17 as nonexempt employees also leads to penalties associated with those employees not being paid
18 properly. Just paying nonexempt employees a straight salary (regardless of amount) is not proper.
19 Instead, those workers are entitled to be paid for all time worked, including all overtime.
20 Unquestionably, these workers had an immense number of unpaid hours including overtime hours –
21 virtually some overtime every pay period. Based on the default civil penalty in Labor Code § 2699(f)
22 of \$100 per aggrieved employee per pay period, the 2,199 pay periods could constitute PAGA
23 penalties of \$219,900.

24 **Claim 7: Failure to Provide a Day of Rest After Seven Consecutive Days of Work in**
25 **Violation of Labor Code §§ 551, 552**

26 39. This seventh PAGA claim alleges that RTI regularly required Young and the other
27 Aggrieved Employees to work more than six days in seven, in violation of Labor Code §§ 551 and
28 552. RTI set schedules and/or encouraged employees to work more than six days in seven and was not

1 neutral in its encouragement to do so and did not notify employees of their rights under these Labor
2 Code sections. Indeed, often workers would work weeks on end with no days off.

3 40. For example, Young's timesheets for weeks starting February 13, 2022 and February
4 20, 2022, showing that he worked 11 days straight without a break. Young's timesheets for weeks
5 starting March 6, 2022, March 13, 2022 and March 20, 2022 showing Young worked 18 days straight
6 without a break. Many of those days were 13 hours or longer (Wed, March 23 shows 16 hours).

7 41. Other employees showed similar daunting schedules. Timesheets from James Beard for
8 weeks starting February 13, 2022 and February 20, 2022 show he was forced to work 13 days straight
9 without a rest day and worked 121 hours for that two week period.

10 42. Plaintiff Young contends that RTI's own management witnesses (such as Trey
11 Schuenemann) testified in deposition that when RTI was working at a refinery doing the cleaning, the
12 employees "often" worked more than six days without rest. Those same witnesses confirmed that RTI
13 "took no steps to ensure employees received a rest day after" six consecutive days of work. Multiple
14 Aggrieved Employees confirmed that even on days that they were otherwise were "off", they were
15 expected to work from home catching up on paperwork and still bill the client for it.

16 43. Per Labor Code 558, there is \$50 penalty for each initial violation and \$100 penalty for
17 each subsequent violation. Plaintiff's expert calculated the expected liability on this claim at about
18 \$15,000.

19 **Claim 8: Improper record keeping location in violation of (Labor Code §§ 1174, 1198)**

20 44. This eighth PAGA claim alleges that RTI employed labor in the State of California but
21 failed to keep at a central location in California payroll records showing the hours worked daily by
22 and the wages paid to, such employees in violation of Labor Code § 1174.

23 45. RTI argued that because employees could access records (time records, paystubs,
24 personnel records, etc.) via a computer in California that RIT was in compliance. The parties dispute
25 whether that is sufficient in light of guidance issued by the DLSE and other authorities.

26 46. Based on the default civil penalty in Labor Code § 2699(f) of \$100 per aggrieved
27 employee per pay period, the 2,199 pay periods could constitute PAGA penalties of \$219,900.

1 **Claim 9: Failure to provide accurate itemized wage statements (Labor Code § 226)**

2 47. This ninth PAGA claim alleges that RTI failed to provide its employees in California
3 with an accurate itemized wage statement each pay period. This is a derivative claim based on the
4 other violations (failure to provide meal/rest periods, etc.). For the misclassified workers, RTI clearly
5 did not comply with this provision (RTI claims they did not have to be based on RTI's contention that
6 all workers were exempt). The penalty is \$250 per employee per pay period. *See* Labor Code § 226.3.
7 Based on the 2,199 pay periods, the PAGA penalties could be \$549,750.

8 **Claim 10: Failure to pay timely wages during employment in violation of (Labor**
9 **Code §§ 204, 216, 223)**

10 48. This tenth PAGA claim alleges that for all the misclassified workers, RTI failed to
11 timely pay employees all their owed wages (such as overtime, meal/rest break premiums, etc.). RTI
12 claims it did not misclassify anyone and therefore there are no violations. At \$100 per violation for the
13 2,199 pay periods, the PAGA penalties could be \$219,900.

14 **Claim 11: Failure to pay all wages owed upon separation from employment in**
15 **violation of Labor Code §§ 201-203;**

16 49. This eleventh PAGA claim alleges that RTI failed to pay all unpaid wages timely after
17 an employee's employment ends in violation of Labor Code § 202. The claim is based on two
18 alternative claims: (1) First, when employees resigned or were terminated, they were not provided
19 their final paycheck within the same day/72 hours required by California law; (2) Second, it doesn't
20 even matter that RTI did not provide the final paycheck pursuant to Labor Code 201 or 202 as a
21 practice. This is because by definition, whenever they paid the final pay to the terminated employee, it
22 did not include all the owed pay for misclassified workers in California who were still owed overtime,
23 meal/rest break premiums, etc. Thus, violations occurred for those employees regardless of whether
24 the check was provided in 24 hours or 72 hours because the check was wrong.

25 50. RTI argues that these specific laws only apply to terminated persons during the PAGA
26 Period who (a) primarily resided; and (b) primarily worked in California. Records reflect that this
27 applies to only 5 persons. Based on the default civil penalty in Labor Code § 2699(f) of \$100 per each
28

1 of the five pay periods at issue (1 for each of the terminated employees), the PAGA Penalty would be
2 \$500.

3 51. Based on all the above claims, a reasonable estimate of the potential liability exposure
4 to RTI is approximately \$2,544,350.00, not counting attorneys' fees, interest, and other sums that
5 could be recoverable at trial.

6 **The Requested Attorneys' Fees And Costs Are Reasonable**

7 52. Plaintiff Young, along with his attorneys at Call & Jensen, resulted in a total gross
8 Settlement Payment of \$895,00.00 – which equates to a recovery of about 35% of the likely best case
9 recovery if Plaintiff Young could prove all the claims for each of the Aggrieved Employees. This is an
10 excellent settlement and an especially favorable result in light of the number of Aggrieved Employees
11 and the challenges Plaintiff may have faced at trial. This result was achieved by the work and success
12 of Call & Jensen, who negotiated the Settlement after extensive preparation.

13 53. The Settlement Agreement provides for an award of PAGA Counsel Fees Payment of
14 not more than \$313,250 (35% of the overall gross Settlement Payment) and PAGA Counsel Litigation
15 Expenses Payment of not more than \$69,069.88.

16 54. In response to the Court's April 22, 2025 Minute Order requesting billing records for
17 attorney's fees (for lodestar cross-check purposes) and billing records for litigation costs incurred by
18 Call & Jensen, documents evidencing those records are attached as exhibits below.

19 55. Attached as **Exhibit C** are the contemporaneous fee billing records evidencing the
20 work performed on this litigation matter and the time for such work. At the very reasonable hourly rate
21 of \$450 for attorneys and \$200 for paralegals, that would equate to at least \$482,840.00 in fees (far
22 more than what we are requesting be awarded from the settlement fund in this case). These number
23 eliminates over 200 hours previously reported that may have been more closely focused on the other
24 cases and not related to the PAGA case, although there could have been cross-over benefits and
25 reasonably included herein.

26 56. Attached as **Exhibit D** are the contemporaneous billing records for costs incurred on
27 this litigation matter. The amount reflected in these cost records is significantly higher than what is
28 reflected in the Settlement Agreement and what Plaintiff sought to recover as costs because the certain

costs/invoices received by our accounting department, such as the experts' invoice, were not reflected in that original briefing to this Court.

Revised Notice To Aggrieved Employees Of PAGA Settlement

57. In its Minute Order, the Court identified modifications to the language in the Notice to the Aggrieved Employees of the PAGA Settlement, including to confirm the definition of Aggrieved Employees with the definition in the Settlement Agreement and the conform the release language as well. See Minute Order, p. 1. Attached as **Exhibits E and F** is a clean and redline Notice, respectively, with the changes requested by the Court.

58. Additionally, RTI has confirmed that there is no need to provide the Notice in any language other than English because all the Aggrieved Employees speak and read fluently in English

59. A copy of Plaintiff Young's Supplemental Brief, this declaration (and all exhibit), as well as the declaration of Lauren Noyes is being filed with the LWDA. A separate proof of service will be filed showing the filing with the LWDA.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 29, 2025 at Newport Beach, California.



Chris C. Scheithauer

EXHIBIT A

Deepak Goel

4822 Commonwealth Ave • La Canada, Ca 91011 • (818) 688-1048 • DGoel@dlseConsulting.com

SUMMARY

Deepak Goel is the founder and Managing Partner at *dlse Consulting LLC*. Prior of starting *dlse Consulting LLC*, he was a Director in the litigation consulting practice of Resolution Economics LLC. Mr. Goel has an MBA from the Marshall School of Business at the University of Southern California and a BS in Business Administration also from the University of Southern California. Prior to joining Resolution Economics, he was a Senior Managing Consultant with Navigant Consulting Inc. and a systems analyst for O'Melveny & Myers.

Mr. Goel has experience developing systems to collect, import, analyze, and report on large amounts of data in the insurance, financial, medical, entertainment, food service, and public sector industries. He is experienced in the application of financial, economic, and statistical analysis to litigation and other general business matters. He has performed financial, statistical, and potential exposure analyses in employment, wage & hour, intellectual property, construction delay and disruptions, and other commercial litigation matters. He has attended and assisted clients at mediations.

PROFESSIONAL EXPERIENCE

Mr. Goel has experience calculating employment-related damages as well as performing statistical analysis of liability in class action employment claims. He also performs financial analysis, general damages analysis, and statistical analysis in a broad range of matters including breach of contract and intellectual property. Assignments representative of Mr. Goel's professional experience include the following:

- Consulting and mediation services to a national restaurant chain's in-house counsel in several class action wage and hour matters alleging failure to pay for missed lunches, failure to pay for missed rest periods, failure to pay accrued vacation at termination, tip share violation and various other allegations. Services included devising a methodology to determine potential violations, methodology to develop a class list, creation of potential exposure models, assisting with data production and assisting at the mediations.
- Consulting services to an organ and tissue recovery firm. Services included identifying potential class members, creating a master database of all time and pay records, calculating the potential exposure under different theories and assumptions. The issue was non-payment of missed meal, incorrect calculation of "regular rate" for overtime hours, and "on-call" hours paid at less than minimum rate.
- Conducting an internal audit for a client in the hospitality industry to determine if the hourly employees were paid appropriately.
- Consulting services to Attorneys General in several states involved in arbitration for reimbursement of medical costs from cigarette manufacturers.

- Consulting and mediation services to a large civil engineering consulting services firm. Services included identifying potential class members and calculation of exposure under differing scenarios due to an illegal alternate work week schedule.
- Consulting services to a governmental agency charged with cleaning up leaking underground storage tanks. Services provided included reengineering, design, and implementation of a computerized system to track applications for reimbursement.
- Consulting and mediation services to a large package delivery company. Services included identifying potential class members and calculation of exposure due to unpaid missed meal periods, incorrect overtime calculation, and unauthorized edits to time records.
- Consulting services to large IT services provider. Services included identifying exempt employees who were “on-call,” the frequency and severity of pages received, and calculation of potential exposure.
- Consulting and mediation services to a large toy retailer. Services included calculation of wages owed for missed lunch breaks, missed rest periods, and off-the-clock work.
- Consulting services to a fitness club in connection with a class action brought by current and former health club members alleging that contracts were misleading. Services included processing and analyzing large quantities of data, and performing statistical analysis of the criteria determining class membership.
- Consulting services to defendant’s counsel in a matter alleging underpayment of expenses and vehicle reimbursement amount to salespeople. Services included analysis of data and an estimation of economic damages.
- Consulting and mediation services to a large home mortgage generation company. Services included calculation of wages owed for missed lunch breaks and off-the-clock work
- Consulting services to a large retailer of musical instruments. Services included a calculation of wages owed if not for an automatic meal deduction policy employed by the retailer.
- Consulting services to a large manufacturer of musical instruments. Services included a calculation of wages owed if not for missed meal period, and working “off-the-clock”.
- Consulting services to defendant’s counsel in a class action matter alleging worked hours not paid at large computer components retailer. Services included defining the potential class and calculating the total hours worked per day by each employee.
- Consulting services to defendant’s counsel in a class action matter alleging racial discrimination in the officer disciplinary process at a very large police department. Services included statistical analysis of data to test plaintiffs’ allegations and work related to rebutting analysis proffered by plaintiffs’ expert.

- Consulting services to plaintiff's counsel in a class action suit alleging misclassification of employees at a government agency. Services included creating a computerized system to calculate damages under various assumptions and reporting the results.
- Consulting and mediation services to a medical instrument manufacturer. Services included calculation of wages owed for missed lunch breaks and off-the-clock work.
- Consulting services to defendant's counsel in two class action wage and hour matters where the underlying issue was the legality of a factored rate plan at two hospitals. Services included creating a model to calculate damages had the plan not been in effect and assisting at the mediation.
- Consulting services to defendant's counsel in two class action wage and hour matters alleging failure to pay for missed lunches and rest periods. Services included devising a methodology to estimate missed rest periods and lunches, and assisting at the mediation.
- Consulting services to defendant's counsel in a wage and hour class action matter alleging that the defendant grocery store chain misclassified several hundred non-exempt assistant managers as exempt workers. Services included creating database of hours worked and designing a flexible financial model.
- Consulting services to plaintiff's counsel in an intellectual property matter alleging that the defendants illegally profited by building a commercial enterprise around the viewing of major sporting events. Created a large database to determine crossover customers and evaluated lost sales.
- Consulting services to plaintiff's counsel in an environmental cleanup matter. Services provided include evaluating potential recovery from insurance carriers, site analysis, policy review, and allocation analysis.
- Consulting services to a governmental agency charged with liquidating failed financial institutions. Services provided include planning and coordinating closing-related data processing activities, including obtaining and converting data from service providers, performing insurance determination for depositors, and pay out functions.
- Consulting services to plaintiff's counsel in a construction delay and disruptions matter in the utility industry. Services provided include designing a computer model to simulate a functioning nuclear power plant and the effect of other energy sources for the utility.
- Consulting services to defendant's counsel in a discrimination matter in the music concert industry. Services provided include assimilation of concert information for different sources and normalizing of the data.

EMPLOYMENT SUMMARY

dlse Consulting LLC:

Managing Partner, 2010 to present

Resolution Economics LLC:

Director, 2008 to 2010

Senior Manager, 2006 to 2008

Manager, 2001 to 2006

Navigant Consulting, Inc. (Peterson Consulting):

Senior Managing Consultant, 1998 to 2001

Managing Consultant, 1996 to 1998

Executive Consultant, 1994 to 1996

Senior Consultant, 1992 to 1994

Staff Consultant, 1990 to 1992

Ernst & Young:

Intern, 1988 to 1990

O'Melveny & Myers:

Trainer / Systems Analyst, 1986 to 1988

Computer Training Specialists:

Trainer, 1985 to 1986

EDUCATION

M.B.A., University of Southern California – Marshall School of Business, 1990

B.S., Business Administration, University of Southern California, 1985

EXHIBIT B

March 12, 2025

Mr. Chris C. Scheithauer
Mr. Travis A. Beck
Call & Jensen
610 Newport Beach Drive
Suite 700
Newport Beach, CA 92660

RE: Young v. Refined Technologies

Dear Mr. Scheithauer and Mr. Beck,

Thank you for giving dlse Consulting the opportunity to serve you.

Enclosed for payment is our invoice number **250304-01** in the amount of **\$25,638.72** for professional services rendered in the above matter.

The invoice covers the period beginning January 1, 2025 and ending February 28, 2025.

Please let us know if you have any questions regarding this invoice.

Very truly yours,



Deepak Goel

Encl: Detailed Invoice



INVOICE

4822 Commonwealth Ave • La Canada, CA 91011 • (818) 688-1048

EIN: 82-4673854

Professional Services Invoiced to:

Mr. Chris C. Scheithauer
Mr. Travis A. Beck
Call & Jensen
610 Newport Beach Drive
Suite 700
Newport Beach, CA 92660

Invoice Copy Sent to:

Invoice #	Invoice Date	Period Covered	Matter Name	Terms
250304-01	03/12/25	1/1/25 - 2/28/25	Young v. Refined Technologies	Net 30 Days

Date	Name	Description	Hours	Rate	Amount
01/23/25	A. Wong	Meeting with counsel	0.50	\$ 425.00	\$ 212.50
01/24/25	A. Wong	Prepare Analysis	0.50	\$ 425.00	\$ 212.50
02/03/25	A. Wong	Internal review	0.25	\$ 425.00	\$ 106.25
02/13/25	A. Wong	Internal review	0.50	\$ 425.00	\$ 212.50
02/14/25	A. Wong	Meeting with counsel	1.00	\$ 425.00	\$ 425.00
02/14/25	A. Wong	Internal review	0.50	\$ 425.00	\$ 212.50
02/19/25	A. Wong	Meeting with counsel	0.25	\$ 425.00	\$ 106.25
02/19/25	A. Wong	Internal review	0.25	\$ 425.00	\$ 106.25
02/20/25	A. Wong	Internal review	0.50	\$ 425.00	\$ 212.50
02/20/25	A. Wong	QA Analysis	3.50	\$ 425.00	\$ 1,487.50
02/21/25	A. Wong	Prepare Analysis	1.00	\$ 425.00	\$ 425.00
02/21/25	A. Wong	Meeting with counsel	1.00	\$ 425.00	\$ 425.00
Employee Subtotal:			9.75		\$ 4,143.75
02/03/25	B. Darrow	Create dataset for analysis	0.25	\$ 400.00	\$ 100.00
02/04/25	B. Darrow	Create dataset for analysis	4.00	\$ 400.00	\$ 1,600.00
02/05/25	B. Darrow	Create dataset for analysis	2.00	\$ 400.00	\$ 800.00
02/06/25	B. Darrow	Create dataset for analysis	2.00	\$ 400.00	\$ 800.00
02/10/25	B. Darrow	Import/Convert Data	3.25	\$ 400.00	\$ 1,300.00
02/11/25	B. Darrow	Import/Convert Data	3.00	\$ 400.00	\$ 1,200.00
02/12/25	B. Darrow	Import/Convert Data	1.50	\$ 400.00	\$ 600.00
02/12/25	B. Darrow	Create dataset for analysis	2.00	\$ 400.00	\$ 800.00
02/13/25	B. Darrow	Import/Convert Data	0.25	\$ 400.00	\$ 100.00
02/13/25	B. Darrow	Create dataset for analysis	1.75	\$ 400.00	\$ 700.00
02/14/25	B. Darrow	Import/Convert Data	6.00	\$ 400.00	\$ 2,400.00
02/17/25	B. Darrow	Create dataset for analysis	6.00	\$ 400.00	\$ 2,400.00
02/18/25	B. Darrow	Create dataset for analysis	1.00	\$ 400.00	\$ 400.00
02/19/25	B. Darrow	Create dataset for analysis	9.50	\$ 400.00	\$ 3,800.00
02/20/25	B. Darrow	Create dataset for analysis	2.00	\$ 400.00	\$ 800.00
02/21/25	B. Darrow	Create dataset for analysis	1.00	\$ 400.00	\$ 400.00
02/21/25	B. Darrow	Meeting with counsel	1.00	\$ 400.00	\$ 400.00
Employee Subtotal:			46.50		\$ 18,600.00
02/13/25	M. Kanabar	Internal review	0.50	\$ 400.00	\$ 200.00
02/14/25	M. Kanabar	Meeting with client and counsel	0.75	\$ 400.00	\$ 300.00
02/18/25	M. Kanabar	QA Analysis	1.00	\$ 400.00	\$ 400.00
02/19/25	M. Kanabar	Meeting with client and counsel	1.00	\$ 400.00	\$ 400.00
02/19/25	M. Kanabar	Prepare Analysis	2.50	\$ 400.00	\$ 1,000.00
02/20/25	M. Kanabar	Prepare Analysis	3.75	\$ 400.00	\$ 1,500.00
02/21/25	M. Kanabar	Prepare Analysis	4.00	\$ 400.00	\$ 1,600.00
Employee Subtotal:			13.50		\$ 5,400.00



INVOICE

4822 Commonwealth Ave • La Canada, CA 91011 • (818) 688-1048

EIN: 82-4673854

Professional Services Invoiced to:

Mr. Chris C. Scheithauer
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Invoice #	Invoice Date	Period Covered	Matter Name	Terms
250304-01	03/12/25	1/1/25 - 2/28/25	Young v. Refined Technologies	Net 30 Days

Date	Name	Description	Hours	Rate	Amount
01/16/25	M. Wong	Prepare Analysis	0.25	\$ 300.00	\$ 75.00
01/21/25	M. Wong	Prepare Analysis	0.25	\$ 300.00	\$ 75.00
01/23/25	M. Wong	Prepare Analysis	1.00	\$ 300.00	\$ 300.00
01/24/25	M. Wong	Prepare Analysis	2.00	\$ 300.00	\$ 600.00
01/27/25	M. Wong	Prepare Analysis	0.25	\$ 300.00	\$ 75.00
02/03/25	M. Wong	Prepare Analysis	0.50	\$ 300.00	\$ 150.00
02/14/25	M. Wong	Prepare Analysis	1.00	\$ 300.00	\$ 300.00
02/18/25	M. Wong	Prepare Analysis	0.25	\$ 300.00	\$ 75.00
		Employee Subtotal:	5.50		\$ 1,650.00
02/05/25	T. Fong	Import/Convert Data	3.50	\$ 400.00	\$ 1,400.00
02/06/25	T. Fong	Import/Convert Data	0.75	\$ 400.00	\$ 300.00
		Employee Subtotal:	4.25		\$ 1,700.00
01/23/25	D. Goel	Meeting with counsel	0.50	\$ 525.00	\$ 262.50
02/14/25	D. Goel	Meeting with counsel	1.00	\$ 525.00	\$ 525.00
02/19/25	D. Goel	Meeting with counsel	0.25	\$ 525.00	\$ 131.25
02/21/25	D. Goel	Meeting with counsel	1.00	\$ 525.00	\$ 525.00
		Employee Subtotal:	1.25		\$ 656.25
		One-Time Discount (25%)			\$ (8,037.50)
		Out-of-Pocket Expenses			
02/11/25	iBridge LLC	Data Entry			\$ 1,526.22
		Invoice Total:	80.75		\$ 25,638.72

Request for Taxpayer Identification Number and Certification

Go to www.irs.gov/FormW9 for instructions and the latest information.

Give form to the
requester. Do not
send to the IRS.

Before you begin. For guidance related to the purpose of Form W-9, see *Purpose of Form*, below.

Print or type. See Specific Instructions on page 3.	1 Name of entity/individual. An entry is required. (For a sole proprietor or disregarded entity, enter the owner's name on line 1, and enter the business/disregarded entity's name on line 2.) disce Consulting LLC	
	2 Business name/disregarded entity name, if different from above.	
	3a Check the appropriate box for federal tax classification of the entity/individual whose name is entered on line 1. Check only one of the following seven boxes. ☐ Individual/sole proprietor ☐ C corporation ☐ S corporation ☐ Partnership ☐ Trust/estate ☒ LLC. Enter the tax classification (C = C corporation, S = S corporation, P = Partnership) P Note: Check the "LLC" box above and, in the entry space, enter the appropriate code (C, S, or P) for the tax classification of the LLC, unless it is a disregarded entity. A disregarded entity should instead check the appropriate box for the tax classification of its owner. ☐ Other (see instructions) _____	4 Exemptions (codes apply only to certain entities, not individuals; see instructions on page 3): Exempt payee code (if any) _____ Exemption from Foreign Account Tax Compliance Act (FATCA) reporting code (if any) _____ (Applies to accounts maintained outside the United States.)
	3b If on line 3a you checked "Partnership" or "Trust/estate," or checked "LLC" and entered "P" as its tax classification, and you are providing this form to a partnership, trust, or estate in which you have an ownership interest, check this box if you have any foreign partners, owners, or beneficiaries. See instructions ☐	
	5 Address (number, street, and apt. or suite no.). See instructions. 4822 Commonwealth Ave 6 City, state, and ZIP code La Canada, CA 91011 7 List account number(s) here (optional)	Requester's name and address (optional)

Part I Taxpayer Identification Number (TIN)	Social security number [][][] - [][] - [][][][] or Employer identification number [8][2] - [4][6][7][3][8][5][4]
Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see <i>How to get a TIN</i> , later. Note: If the account is in more than one name, see the instructions for line 1. See also <i>What Name and Number To Give the Requester</i> for guidelines on whose number to enter.	

Part II Certification	
Under penalties of perjury, I certify that:	
1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and	
2. I am not subject to backup withholding because (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and	
3. I am a U.S. citizen or other U.S. person (defined below); and	
4. The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.	
Certification instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and, generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later.	
Sign Here	Signature of U.S. person  Date 11/7/2024

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Future developments. For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to www.irs.gov/FormW9.

What's New

Line 3a has been modified to clarify how a disregarded entity completes this line. An LLC that is a disregarded entity should check the appropriate box for the tax classification of its owner. Otherwise, it should check the "LLC" box and enter its appropriate tax classification.

New line 3b has been added to this form. A flow-through entity is required to complete this line to indicate that it has direct or indirect foreign partners, owners, or beneficiaries when it provides the Form W-9 to another flow-through entity in which it has an ownership interest. This change is intended to provide a flow-through entity with information regarding the status of its indirect foreign partners, owners, or beneficiaries, so that it can satisfy any applicable reporting requirements. For example, a partnership that has any indirect foreign partners may be required to complete Schedules K-2 and K-3. See the Partnership Instructions for Schedules K-2 and K-3 (Form 1065).

Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS is giving you this form because they

iBridge LLC

12725 SW Millikan Way, Ste #300
Beaverton, OR 97005 US
503-906-3930
accounting@ibridgellc.com



INVOICE

BILL TO

Deepak Goel
dlse Consulting
66 Via Ricardo
Newbury Park, CA 91320

INVOICE # 8547**DATE** 02/11/2025**DUE DATE** 03/13/2025**TERMS** Net 30**JOB NAME**

Young v. Refined Technologies

DESCRIPTION	QTY	RATE	AMOUNT
Time Sheet Coding, per row Delivered date 2/3 QA2325-05	8,479	0.18	1,526.22

Attn: Adriane Wong

BALANCE DUE

\$1,526.22

A late payment fee may be charged at 1.5% per month
on any unpaid amount past the payment terms.

EXHIBIT C

<u>Trans Date</u>	<u>Tkpr</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
7/8/2022	11	450.00	1.30	\$ 585.00	CORRESPOND WITH CLIENT AND STRATEGIZE REGARDING PURSUIT OF POTENTIAL PAGA CLAIM.
7/8/2022	11	450.00	0.50	\$ 225.00	STRATEGIZE REGARDING PAGA LETTER AND PLANS TO PURSUE SEPARATE PAGA CLAIM.
7/15/2022	19	450.00	1.20	\$ 540.00	REVIEW PAGA STATUTES AND PREPARE NOTICE TO LWDA AND REFINED TECHNOLOGIES.
7/20/2022	19	450.00	0.10	\$ 45.00	CORRESPOND WITH OPPOSING COUNSEL.
7/28/2022	11	450.00	0.50	\$ 225.00	REVIEW AND REVISE PAGA LETTER; CORRESPOND WITH CLIENT REGARDING LETTER AND STRATEGY MOVING FORWARD WITH THE PAGA CLAIM ONCE IT IS FILED.
7/29/2022	11	450.00	1.00	\$ 450.00	UPDATE WITH CLIENTS REGARDING FINAL PAGA LETTER; CORRESPOND WITH J. YOUNG ANSWERING YOUNG'S QUESTIONS ABOUT NEXT STEPS AND WHAT HE NEEDS TO DO.
7/29/2022	11	450.00	0.30	\$ 135.00	TELEPHONE CONFERENCE WITH J. YOUNG CONFIRMING AGREEMENT WITH PAGA CASE AND ANSWERING CLIENT QUESTIONS REGARDING SAME, INCLUDING POSSIBLE LENGTH OF THE PROCESS.
8/1/2022	19	450.00	0.30	\$ 135.00	FINALIZE AND SUBMIT PAGA NOTICE.
8/2/2022	11	450.00	1.50	\$ 675.00	CORRESPOND REGARDING PAGA ENTITY AND DEADLINE FOR RESPONDING TO THE ADMINISTRATIVE PREREQUISTE FILING.
9/1/2022	19	450.00	0.80	\$ 360.00	PREPARE PAGA COMPLAINT.
9/5/2022	19	450.00	0.50	\$ 225.00	PREPARE PAGA COMPLAINT.
9/5/2022	11	450	2.6	\$ 1,170.00	STRATEGIZE REGARDING PAGA CASE AND PLANS FOR SAME.
9/6/2022	19	450.00	0.30	\$ 135.00	FINALIZE COMPLAINT FOR FILING.
9/6/2022	11	450.00	3.7	\$ 1,665.00	FINALIZE PAGA COMPLAINT, CORRESPOND WITH CLIENT REGARDING STATUS AND FINALIZE PLEADING, AND TELEPHONE CONFERENCE WITH CLIENT REGARDING PLANS FOR DISCOVERY AND ITEMS TO CONFIRM WITH RTI TO RE FACTS.
9/22/2022	11	450	0.2	\$ 90.00	CORRESPOND WITH CLIENT REGARDING UPDATE.
9/30/2022	11	450.00	1.50	\$ 675.00	PLANS FOR PAGA CASE AND REVIEW CORRESPONDENCE REGARDING SAME.
10/5/2022	19	450.00	0.2	\$ 90.00	MEET AND CONFER WITH OPPOSING COUNSEL REGARDING DEMURRER.
10/11/2022	19	450.00	0.90	\$ 405.00	RESEARCH AND ANALYSIS REGARDING EFFECT OF VIKING RIVER CRUISES ON PAGA CLAIM.
10/12/2022	19	450.00	1.00	\$ 450.00	RESEARCH ISSUES REGARDING PAGA; CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME.

10/18/2022	11	450.00	1.10	\$	495.00	COMMUNICATE WITH LITIGATION TEAM REGARDING STRATEGY, REVIEW CORRESPONDENCE, AND PLANS FOR CASE TRIAL.
10/20/2022	11	450.00	2.60	\$	1,170.00	REVIEW DEMURRER AND MOTION TO COMPEL ARBITRATION, AND STRATEGIZE REGARDING SAME, INCLUDING NEXT STEPS IN CASES; CORRESPOND WITH CLIENT REGARDING SAME.
10/21/2022	11	450.00	1	\$	450.00	STRATEGIZE AND CORRESPOND REGARDING POTENTIAL AMENDED COMPLAINT TO MOOT THEIR MOTION.
10/21/2022	19	450.00	1.40	\$	630.00	REVIEW MOTIONS, PREPARE AMENDED COMPLAINT, AND RESEARCH POTENTIAL PENALTIES.
10/27/2022	11	450.00	0.40	\$	180.00	STRATEGIZE REGARDING PURSUING PAGA CLAIM AND COMMUNICATION WITH LITIGATION TEAM REGARDING SAME.
10/31/2022	11	450.00	1.50	\$	675.00	REVIEW PLEADINGS SUBMITTED BY OPPOSING COUNSEL AND CORRESPOND WITH CLIENT REGARDING SAME.
10/31/2022	11	450.00	0.40	\$	180.00	TELEPHONE CONFERENCE WITH CLIENT J. YOUNG AND OVERVIEW OF CURRENT STATUS, AND CLAIMS.
11/2/2022	11	450.00	0.40	\$	180.00	STRATEGIZE REGARDING ADDING ADDITIONAL LABOR CODE CLAIM PER CLIENT DISCUSSION REGARDING LABOR CODE WAGES AND PENALTIES.
11/3/2022	11	450.00	1.50	\$	675.00	INSTRUCT TEAM REGARDING OPPOSITION TO MOTION AND REVIEW SAME, INCLUDING OUTLINE OF LIKELY ARGUMENTS AND VIKING RIVER DISTINCTION.
11/4/2022	11	450.00	1.20	\$	540.00	INSTRUCTIONS TO TEAM REGARDING OPPOSITIONS TO MOTIONS, REVIEW OPPOSITION BRIEF, AND PLANS FOR PUSHING FORWARD IN LIGHT OF THE DEFENDANT'S TACTICS.
11/4/2022	19	450.00	1.60	\$	720.00	PREPARE AND FILE OPPOSITION TO MOTION TO COMPEL ARBITRATION AND DISMISS.
11/7/2022	19	450.00	0.60	\$	270.00	PREPARE PAGA DISCOVERY.
11/7/2022	11	450.00	1.70	\$	765.00	TELEPHONE CONFERENCE WITH AND UPDATE REGARDING DISCOVERY NEEDED, AND PLANS FOR SAME.
11/9/2022	19	450.00	0.50	\$	225.00	PREPARE PAGA DISCOVERY.
11/10/2022	19	450.00	2.60	\$	1,170.00	PREPARE DISCOVERY FOR PAGA CASE.
11/14/2022	11	450.00	1.50	\$	675.00	CORRESPOND WITH J. YOUNG REGARDING REMINDER ON POTENTIAL ADDITIONAL CLAIM AND INSTRUCTIONS TO TEAM REGARDING NEXT STEPS AND COURT CONFERENCE UPCOMING OFF CALENDAR.
11/14/2022	19	450.00	2.30	\$	1,035.00	REVIEW ORDER ON REQUEST TO AMEND CLAIM; PREPARE DISCOVERY FOR PAGA CASE.
11/15/2022	19	450.00	0.40	\$	180.00	PREPARE DISCOVERY FOR PAGA CASE. PREPARE DISCOVERY.
11/16/2022	19	450.00	0.10	\$	45.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING DEMURRER.
11/16/2022	11	450.00	0.60	\$	270.00	REVIEW OPEN ITEMS AND UPDATE IN CASE; CORRESPOND WITH CLIENT REGARDING SAME.

11/16/2022	19	450.00	0.10	\$	45.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING DEMURRER.
11/18/2022	11	450.00	1.80	\$	810.00	TELEPHONE CONFERENCE WITH CLIENT REGARDING CASE UPDATE AND OUTLINE OF ALL ISSUES FOR CLIENT; STRATEGIZE REGARDING NEXT STEPS AS WELL AS PURSUING ADDITIONAL CLAIMS.
11/18/2022	19	450.00	0.10	\$	45.00	FINALIZE DISCOVERY IN PAGA CASE.
11/29/2022	11	450.00	0.30	\$	135.00	TELEPHONE CONFERENCE WITH CLIENT REGARDING POSSIBLE CLAIM UNDER LABOR CODE SECTION 203.
11/30/2022	19	450.00	1.40	\$	630.00	PREPARE FOR AND ATTEND STATUS CONFERENCE; CORRESPOND WITH OPPOSING COUNSEL REGARDING CLAIMS.
12/1/2022	19	450.00	0.10	\$	45.00	REVIEW SCHEDULING ORDER.
12/7/2022	11	450.00	0.20	\$	90.00	TELEPHONE CONFERENCE WITH CLIENT AND CORRESPOND.
12/9/2022	19	450.00	0.60	\$	270.00	REVIEW AMENDED CASE MANAGEMENT ORDER AND CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME.
12/13/2022	19	450.00	0.80	\$	360.00	PREPARE AMENDED STATEMENT OF CLAIM.
12/14/2022	19	450.00	0.20	\$	90.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING AMENDED CLAIM.
12/14/2022	11	450.00	1.40	\$	630.00	REVIEW AMENDED COMPLAINT AND INSTRUCTIONS TO TEAM, INCLUDING REVIEW OF CORRESPONDENCE AND FURTHER CLAIMS PURSUED.
12/21/2022	11	450.00	0.80	\$	360.00	STRATEGIZE REGARDING PAGA CLAIM AND INSTRUCTIONS TO TEAM REGARDING VACATION PAY CLAIM.
12/21/2022	19	450.00	0.30	\$	135.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING AMENDED CLAIM.
12/28/2022	11	450.00	0.60	\$	270.00	TELEPHONE CONFERENCE WITH J. YOUNG REGARDING STATUS UPDATE AND ITS IMPACT ON THE CASE.
1/5/2023	19	450.00	4.00	\$	1,800.00	RESEARCH AND PREPARE OPPOSITION TO DEMURRER.
1/5/2023	19	450.00	0.10	\$	45.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING PAYSTUBS.
1/6/2023	19	450.00	0.60	\$	270.00	FINALIZE AND FILE OPPOSITION TO DEMURRER AND OBJECTION TO REQUEST FOR JUDICIAL NOTICE.
1/11/2023	11	450.00	0.40	\$	180.00	CORRESPOND WITH LITIGATION TEAM REGARDING VACATION PAY CLAIM AND PLANS FOR SAME, INCLUDING FINALIZING CLAIM AFTER SOME DISCOVERY FROM THE OTHER SIDE.
1/12/2023	11	450.00	0.30	\$	135.00	STRATEGIZE REGARDING VACATION PAY AND CORRESPOND WITH CLIENT REGARDING SAME.
1/12/2023	19	450.00	0.20	\$	90.00	REVIEW REPLY IN SUPPORT OF DEMURRER.
1/12/2023	19	450.00	0.30	\$	135.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING VACATION PAY ISSUE.
1/16/2023	19	450.00	0.30	\$	135.00	PREPARE DEMAND FOR EMPLOYEE FILE.
1/19/2023	19	450	0.2	\$	90.00	REVIEW TENTATIVE RULING; CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME.

1/19/2023	11	450	0.6	\$	270.00	REVIEW TENTATIVE RULING; CORRESPOND WITH LITIGATION TEAM REGARDING SAME; CORRESPOND WITH CLIENTS REGARDING NEXT STEPS.
1/20/2023	11	450.00	0.30	\$	135.00	REVIEW CORRESPONDENCE AND STRATEGIZE REGARDING SAME.
1/20/2023	19	450.00	0.1	\$	45.00	TELEPHONE CALL WITH COURTROOM CLERK REGARDING SUBMITTING ON TENTATIVE RULING.
2/1/2023	19	450.00	1.20	\$	540.00	REVIEW DISCOVERY; CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME.
2/1/2023	11	450.00	0.40	\$	180.00	TELEPHONE CONFERENCE WITH CLIENT REGARDING UPDATE PLANS.
2/3/2023	11	450.00	1.20	\$	540.00	REVIEW DISCOVERY AND CORRESPONDENCE AND PLANS FOR SAME.
2/3/2023	19	450.00	0.30	\$	135.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES.
2/6/2023	11	450.00	1.50	\$	675.00	REVIEW PLANS AND CORRESPOND WITH CLIENT REGARDING SAME.
2/6/2023	19	450.00	0.50	\$	225.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING DISCOVERY PLAN.
2/7/2023	11	450.00	1.40	\$	630.00	TELEPHONE CONFERENCE WITH CLIENT AND LITIGATION TEAM REGARDING STATUS.
2/7/2023	11	450.00	2.00	\$	900.00	RESEARCH REGARDING FATIGUE TIME, CORRESPOND WITH CLIENT REGARDING ADDITIONAL BACKGROUND FACTS AND DLSE PLANS, AND ADDITIONAL RESEARCH ON FATIGUE TIME BEING AN ISSUE FOR RTI AND PLANS FOR SAME.
2/7/2023	11	450.00	1.40	\$	630.00	CORRESPOND WITH CLIENT.
2/7/2023	11	450.00	0.70	\$	315.00	RESEARCH REGARDING DLSE POLICY AND REVIEW POLICY REGARDING SAME.
2/7/2023	19	450.00	3.10	\$	1,395.00	REVIEW J. YOUNG PAYROLL RECORDS AND PERSONNEL FILE; PREPARE CASE SUMMARY.
2/7/2023	19	450.00	2.50	\$	1,125.00	RESEARCH AND ANALYSIS REGARDING FATIGUE TIME ISSUE; CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME.
2/8/2023	11	450.00	1.20	\$	540.00	STRATEGIZE AND INSTRUCTIONS TO LITIGATION TEAM REGARDING PLANS FOR DISCOVERY.
2/8/2023	19	450.00	0.50	\$	225.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES.
2/10/2023	11	450.00	0.50	\$	225.00	REVIEW AND REVISE COMPLAINT AND INSTRUCTIONS REGARDING SAME.
2/14/2023	11	450.00	1.70	\$	765.00	REVIEW DISCOVERY PLAN AND CORRESPOND WITH TEAM REGARDING SAME, INCLUDING REVIEW OF DISCOVERY CORRESPONDENCE.
2/15/2023	11	450.00	0.30	\$	135.00	REVIEW DISCOVERY AND CORRESPOND WITH CLIENT REGARDING SAME.

2/24/2023	11	450.00	1.50	\$	675.00	STRATEGIZE REGARDING DISCOVERY; MULTIPLE COMMUNICATIONS WITH CLIENT REGARDING DISCOVERY PLANS AND RESPONSES FOR SAME.
2/28/2023	11	450.00	1.60	\$	720.00	STRATEGIZE REGARDING POSSIBLE ADDITIONAL PAGA CLAIMS AND NEED TO SUPPLEMENT LWDA LETTER AND TELEPHONE CONFERENCE WITH CLIENT REGARDING SAME.
3/2/2023	19	450.00	0.90	\$	405.00	RESEARCH AND PREPARE SECOND PAGA NOTICE.
3/2/2023	11	450.00	1.30	\$	585.00	TELEPHONE CONFERENCE WITH CLIENT REGARDING PAGA CLAIM AND PLANS FOR SAME; COMMUNICATE WITH LITIGATION TEAM REGARDING AMENDED PAGA LETTER AND PLANS FOR SAME.
3/3/2023	19	450.00	1.80	\$	810.00	PREPARE UPDATED PAGA NOTICE.
3/6/2023	19	450.00	0.20	\$	90.00	ANALYSIS REGARDING POTENTIAL PAGA CLAIM.
3/6/2023	11	450.00	2.40	\$	1,080.00	REVIEW AND REVISE LWDA LETTER AND STRATEGIZE REGARDING ADDITIONAL CLAIMS TO ALLEGE IN THE LETTER; COMMUNICATE WITH LITIGATION TEAM REGARDING SAME.
3/9/2023	19	450.00	0.70	\$	315.00	REVIEW DOCUMENTS PRODUCED BY RTI.
3/21/2023	11	450.00	0.20	\$	90.00	CORRESPOND WITH J. YOUNG REGARDING REMINDER ON WITNESSES.
3/21/2023	11	450.00	0.20	\$	90.00	CORRESPOND WITH J. YOUNG REGARDING REMINDER ON WITNESSES.
3/23/2023	11	450.00	0.40	\$	180.00	REVIEW WITNESS LIST FROM THE CLIENT AND PLANS FOR SAME.
4/3/2023	19	450.00	1.1	\$	495.00	TELEPHONE CALL WITH RTI EMPLOYEES REGARDING PAGA CLAIMS.
4/5/2023	19	450.00	2.00	\$	900.00	TELEPHONE CALL WITH FORMER RTI CO-WORKERS; PREPARE 2D PAGA NOTICE.
4/5/2023	11	450.00	1.40	\$	630.00	FINALIZE PAGA LETTER AND CORRESPOND WITH CLIENT REGARDING THE CLAIM AND INPUT FOR CLIENT REVIEW AND AUTHORIZATION TO PROCEED.
4/6/2023	19	450.00	1.60	\$	720.00	FINALIZE SECOND PAGA NOTICE
4/6/2023	11	450.00	2.50	\$	1,125.00	TELEPHONE CALL WITH CLIENT TO CONFIRM BACKGROUND FACTS OF THE LETTER BEING FILED WITH THE LABOR AND WORKFORCE DEVELOPMENT AGENCY; FINALIZE CORRESPONDENCE OF SAME.
4/13/2023	11	450.00	0.50	\$	225.00	TELEPHONE CALL WITH CLIENT J. YOUNG AND REVIEW CORRESPONDENCE REGARDING SAME.
5/8/2023	19	450.00	0.90	\$	405.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING CASE.
5/8/2023	11	450.00	1.00	\$	450.00	STRATEGIZE REGARDING NEXT STEPS AND UPDATE WITH CLIENT AND TEAM REGARDING SAME.
5/16/2023	11	450.00	0.80	\$	360.00	TELEPHONE CALL WITH J. YOUNG REGARDING UPDATE ON EMPLOYMENT STATUS AND PLANS FOR THE CASE, INCLUDING UPDATE.
5/16/2023	11	450.00	0.80	\$	360.00	TELEPHONE CALL WITH J. YOUNG REGARDING PLANS FOR THE CASE, INCLUDING UPDATE.

5/22/2023	11	450.00	2.20	\$	990.00	TELEPHONE CALL WITH J. YOUNG AND PLANS FOR CASE CONTINUING AND ANY OTHER ISSUES THAT MIGHT ARISE; STRATEGIZE WITH LITIGATION TEAM REGARDING DISCOVERY AND PLANS FOR SAME.
5/24/2023	11	450.00	0.70	\$	315.00	REVIEW CORRESPONDENCE FROM OPPOSING COUNSEL REGARDING SETTLEMENT DISCUSSION AND CORRESPOND WITH CLIENTS REGARDING SAME.
5/25/2023	11	450.00	0.80	\$	360.00	INSTRUCTIONS REGARDING SETTLEMENT STRATEGY AND INFORMATION NEEDED REGARDING CASE EVALUATION FOR THE PAGA ALLEGATIONS.
6/6/2023	11	450.00	1.00	\$	450.00	REVIEW LIST OF ITEMS NEEDED FOR DISCOVERY AND POSSIBLE EVALUATION OF THE PAGA CASE, AND PLANS FOR SAME.
6/20/2023	19	450.00	1.60	\$	720.00	CORRESPOND WITH OPPOSING COUNSEL AND CLIENT REGARDING DEPOSITIONS; PREPARE DEPOSITION NOTICE; PREPARE FOR DEPOSITIONS.
6/23/2023	11	450.00	1.70	\$	765.00	STRATEGIZE REGARDING DISCOVERY; REVIEW CORRESPONDENCE AND SUBPOENA PLANS AND INSTRUCTIONS TO TEAM AND PLANS FOR SAME.
7/13/2023	11	450.00	1.30	\$	585.00	TELEPHONE CALL WITH CLIENT REGARDING SETTLEMENT OPTIONS AND PLANS FOR THE CASE.
7/18/2023	11	450.00	1.20	\$	540.00	CORRESPOND WITH CLIENT REGARDING DEPOSITION STRATEGY AND FOLLOW UP; COMMUNICATE WITH LITIGATION TEAM REGARDING SAME.
7/20/2023	11	450.00	0.5	\$	225.00	REVIEW ADOLPH V. UBER CASE AUTHORITY AND ITS IMPACT ON OUR CASE; CORRESPOND WITH CLIENT REGARDING SETTLEMENT AUTHORITY PLANS.
7/22/2023	11	450.00	1.5	\$	675.00	ADDITIONAL CORRESPONDENCE AND FOLLOW UP WITH CLIENT REGARDING REVIEWING CLIENT CONCERNS, NEXT STEPS, AND ANSWER CLIENT QUESTIONS ABOUT WHAT WILL HAPPEN NEXT, AND THE DECISION ABOUT A SETTLEMENT DEMAND.
7/25/2023	11	450.00	0.7	\$	315.00	TELEPHONE CALL WITH J. YOUNG REGARDING SETTLEMENT POSTURE AND DECISIONS; CORRESPOND WITH OPPOSING COUNSEL.
7/25/2023	11	450.00	0.7	\$	315.00	TELEPHONE CALL WITH CLIENT REGARDING SETTLEMENT AND STRATEGIZE REGARDING SAME.
7/27/2023	19	450.00	2.3	\$	1,035.00	PREPARE AMENDED COMPLAINT AND STIPULATION.
7/27/2023	19	450.00	1.1	\$	495.00	REVIEW AND REVISE PROPOSED CONFIDENTIALITY PROVISION.
8/1/2023	11	450.00	1.30	\$	585.00	STRATEGIZE REGARDING PLAN TO MAKE SURE THE PAGA CLAIM CONTINUES IN COURT; REVIEW AND STRATEGIZE REGARDING RECENT ARTICLE ABOUT PAGA STANDING IN LAW260 AS IT POTENTIALLY APPLIES TO THE PLAINTIFF CASE FOR J. YOUNG IN THIS ACTION.
8/1/2023	45	200	1.7	\$	340.00	REVIEW CASE BUDGET.
8/18/2023	11	450	0.4	\$	180.00	REVIEW COURT ORDER AND UPDATE WITH TEAM REGARDING NEXT STEPS.

8/21/2023	19	450	0.5	\$	225.00	PREPARE DISCOVERY BASED ON SECOND AMENDED COMPLAINT.
8/23/2023	19	450	1.7	\$	765.00	PREPARE DISCOVERY REQUESTS.
8/24/2023	19	450	0.1	\$	45.00	FINALIZE AND FILE SECOND AMENDED COMPLAINT.
8/24/2023	19	450	0.7	\$	315.00	PREPARE DISCOVERY REQUESTS.
8/24/2023	12	450	1.4	\$	630.00	REVIEW SECOND AMENDED COMPLAINT AND AMENDED PAGA NOTICE.
8/24/2023	11	450	2.2	\$	990.00	REVIEW AND FINALIZE SECOND AMENDED COMPLAINT WITH THOROUGH PAGA ALLEGATIONS, INSTRUCTIONS TO TEAM REGARDING SAME, AND AUTHORIZE PLEADING FILING.
8/29/2023	19	450	0.1	\$	45.00	PREPARE DISCOVERY REQUESTS.
8/30/2023	11	450	2	\$	900.00	FINALIZE DISCOVERY AND CORRESPOND WITH TEAM REGARDING CHANGES MADE.
8/30/2023	19	450	0.9	\$	405.00	PREPARE WRITTEN DISCOVERY.
9/8/2023	19	450.00	1.20	\$	540.00	REVIEW COURT ORDERS AND PREPARE JOINT STATUS CONFERENCE STATEMENT; CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME.
9/8/2023	11	450	1.5	\$	675.00	STRATEGIZE REGARDING STAFFING UPDATE, TASKS FOR PLAINTIFF PAGA CASE, AND PLANS FOR MOVING THE CASE FORWARD WITH CASE MANAGEMENT PLAN FOR THE COURT.
9/8/2023	11	450	0.2	\$	90.00	REVIEW AND REVISE PROPOSED JOINT REPORT.
9/8/2023	11	450	0.2	\$	90.00	CORRESPOND REGARDING DRAFT JOINT REPORT.
9/12/2023	7	450.00	1.1	\$	495.00	REVIEW FILE MATERIALS; FOLLOW UP REGARDING CASE STATUS STATEMENT FOR COURT; ANALYSIS OF CLAIMS.
9/13/2023	19	450.00	0.40	\$	180.00	TELEPHONE CALL WITH OPPOSING COUNSEL
9/13/2023	11	450.00	0.70	\$	315.00	REVIEW CORRESPONDENCE REGARDING JOINT REPORT AND DISCUSSION OF DEADLINES WITH THE COURT AND OPPOSING COUNSEL.
9/13/2023	7	450.00	1	\$	450.00	TELEPHONE CONFERENCE WITH OPPOSING COUNSEL REGARDING JOINT STATUS REPORT AND CASE TIMELINE/STATUS; FOLLOW UP REGARDING OPPOSING COUNSEL'S MEET/CONFER ON MOTION TO STRIKE ON MANAGEABILITY GROUPS; FOLLOW UP REGARDING SAME.
9/14/2023	19	450.00	0.70	\$	315.00	FOLLOW UP RE SCHEDULING ISSUES AND ANTICIPATED MOTION TO STRIKE.
9/14/2023	11	450.00	1.50	\$	675.00	REVIEW REDLINED JOINT REPORT, REVIEW CASE LAW REGARDING PAGA MOTION THREATENED BY THE OTHER SIDE, AND CORRESPOND WITH CLIENT REGARDING CASE UPDATE.
9/14/2023	7	450	0.3	\$	135.00	CORRESPOND WITH COUNSEL REGARDING JOINT STATUS CONFERENCE STATEMENT.
9/20/2023	19	450.00	0.70	\$	315.00	REVISE JOINT STATEMENT; CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME. RESEARCH REGARDING MOTION TO STRIKE AND DEMURRER; CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME.

9/20/2023	7	450	0.5	\$	225.00	REVIEW MEET AND CONFER CORRESPONDENCE FROM OPPOSING COUNSEL REGARDING COMPLAINT AND POSSIBLE MANAGEABILITY ISSUES; FOLLOW UP REGARDING SAME.
9/21/2023	11	450.00	0.60	\$	270.00	REVIEW CORRESPONDENCE REGARDING THREATENED DEMURRER AND INSTRUCTIONS TO TEAM REGARDING SAME.
9/21/2023	19	450.00	1.20	\$	540.00	ATTEND STATUS CONFERENCE; MEMORANDUM TO FILE REGARDING SAME.
9/21/2023	19	450.00	1.00	\$	450.00	RESEARCH AND PREPARE MEMORANDUM REGARDING RTI THREATENED MOTION TO STRIKE; CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME.
9/25/2023	11	450.00	0.90	\$	405.00	REVIEW CORRESPONDENCE AND LEGAL AUTHORITY OF THE OTHER SIDE REGARDING POTENTIAL STAY.
10/11/2023	11	450.00	0.90	\$	405.00	STRATEGIZE REGARDING DISCOVERY EXTENSION AND TASKS FOR RTI TO BE COMPLETED.
10/11/2023	7	450.00	0.2	\$	90.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES.
10/13/2023	11	450.00	0.5	\$	225.00	REVIEW CORRESPONDENCE FROM THE OTHER SIDE AND INSTRUCTIONS TO TEAM TO PUSH FORWARD ON THE CASE AND NEXT STEPS.
10/27/2023	11	450.00	0.40	\$	180.00	CORRESPOND REGARDING DISCOVERY AND PREPARE FOR SAME.
10/29/2023	7	450.00	3.90	\$	1,755.00	REVIEW DISCOVERY RESPONSES FROM DEFENDANT; ANALYSIS REGARDING MEET AND CONFER ON DISCOVERY RESPONSES AND NEED FOR PROTECTIVE ORDER; FOLLOW UP REGARDING SAME.
10/30/2023	11	450.00	1.30	\$	585.00	CORRESPOND REGARDING PROPOSED ORDER AND CONFIDENTIALITY AND DISCOVERY PLANS FOR SAME INCLUDING INSTRUCTIONS TO TEAM.
11/1/2023	7	450.00	3.5	\$	1,575.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES, INCLUDING PROTECTIVE ORDER AND FACTUAL DEVELOPMENT; ANALYSIS OF DISCOVERY ISSUES AND MEET AND CONFER.
11/2/2023	7	450.00	7	\$	3,150.00	ADDITIONAL STRATEGIZING REGARDING DISCOVERY ISSUES; FURTHER PREPARATION OF MEET AND CONFER LETTER; PREPARE REQUEST FOR PRODUCTION OF DOCUMENTS, SET 2; FINALIZE STIPULATED PROTECTIVE ORDER; MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING SAME.
11/7/2023	7	450.00	0.50	\$	225.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES; FOLLOW UP REGARDING SAME.
11/8/2023	7	450.00	1.00	\$	450.00	TELEPHONE CONFERENCE WITH OPPOSING COUNSEL REGARDING DISCOVERY DISPUTE; PREPARE CORRESPONDENCE TO OPPOSING COUNSEL REGARDING SAME; FOLLOW UP REGARDING OUTSTANDING DISCOVERY.

11/8/2023	11	450.00	1.30	\$	585.00	REVIEW CORRESPONDENCE AND DISCOVERY MEET AND CONFER EFFORTS AND UPDATE WITH CLIENT AND TEAM REGARDING SAME.
11/9/2023	7	450.00	0.60	\$	270.00	STRATEGIZE REGARDING OUTSTANDING DISCOVERY ISSUES AND MANAGEABILITY QUESTION.
11/29/2023	7	450.00	1.3	\$	585.00	REVIEW DEFENDANT'S AMENDED RESPONSES TO DISCOVERY REQUESTS.
11/30/2023	11	450.00	0.7	\$	315.00	REVIEW SUPPLEMENTAL DISCOVERY AND CORRESPOND WITH CLIENT ANSWERING CLIENT QUESTION ABOUT REACH OF THE CASE AND DISCOVERY.
11/30/2023	7	450.00	0.50	\$	225.00	CORRESPOND WITH T. KENNEDY REGARDING YOUNG CASE; FOLLOW UP REGARDING SAME; STRATEGIZE REGARDING DISCOVERY ISSUES.
11/30/2023	7	450.00	0.6	\$	270.00	STRATEGIZE REGARDING DISCOVERY ISSUES AND NEXT STEPS AGAINST DEFENDANT.
12/4/2023	7	450.00	3.1	\$	1,395.00	ADDITIONAL ANALYSIS OF RTI DISCOVERY RESPONSES AND DOCUMENTS; BEGIN MEET AND CONFER PROCESS AND SETTING UP MOTIONS TO COMPEL.
12/5/2023	7	450.00	3.5	\$	1,575.00	FURTHER PREPARATION OF MEET AND CONFER LETTER REGARDING DEFENDANT'S AMENDED DISCOVERY RESPONSES.
12/5/2023	45	200.00	0.80	\$	160.00	PREPARE DOCUMENT PRODUCTION FOR ATTORNEY REVIEW.
12/6/2023	7	450.00	1.10	\$	495.00	STRATEGIZE REGARDING DISCOVERY MEET AND CONFER.
12/8/2023	7	450.00	1.9	\$	855.00	STRATEGIZE REGARDING DISCOVERY ISSUES AND FACTUAL DEVELOPMENT; ADDITIONAL WORK ON MEET/CONFER AND NEED FOR INFORMAL DISCOVERY CONFERENCE WITH COURT.
12/11/2023	7	450.00	3.3	\$	1,485.00	ADDITIONAL PREPARATION OF MEET AND CONFER LETTER REGARDING DISCOVERY RESPONSES; COORDINATE INFORMAL DISCOVERY CONFERENCE WITH COURT; FOLLOW UP REGARDING SAME.
12/12/2023	7	450.00	1.00	\$	450.00	MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING DISCOVERY DISPUTE; FOLLOW UP REGARDING SAME AND SCHEDULING OF INFORMAL DISCOVERY CONFERENCE WITH COURT TO RESOLVE DISCOVERY DISPUTE.
12/12/2023	11	450.00	0.70	\$	315.00	CORRESPOND WITH CLIENT REGARDING CASE STATUS
12/13/2023	7	450.00	1.1	\$	495.00	MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL AND COURT REGARDING INFORMAL DISCOVERY CONFERENCE; STRATEGIZE REGARDING DISCOVERY DISPUTES; FOLLOW UP REGARDING SAME.
12/14/2023	7	450.00	0.6	\$	270.00	STRATEGIZE REGARDING DISCOVERY ISSUES; FOLLOW UP CORRESPONDENCE TO T. KENNEDY REGARDING SAME.
12/15/2023	11	450.00	1.80	\$	810.00	CORRESPOND WITH J. YOUNG REGARDING STATUS
12/15/2023	7	450.00	0.90	\$	405.00	FOLLOW UP ON DISCOVERY ISSUES; FURTHER OUTLINE OF EVIDENCE SUPPORTING CLAIMS; BEGIN PREPARATION FOR DISCOVERY CONFERENCE WITH COURT.

12/15/2023	45	200.00	2.00	\$	400.00	REVIEW DEFENDANT'S DOCUMENT PRODUCTION, RTI-PAGA_000001-001009, CONVERT TO PDF, PREPARE COMBINED AND CATEGORIZED VERSIONS, AND NAME FILES FOR ATTORNEY REVIEW.
12/18/2023	45	200.00	1.60	\$	320.00	CONVERT DEFENDANT DOCUMENT PRODUCTION, RTI-PAGA_001010-1153, PREPARE COMBINED AND SEPARATE DOCUMENTS FOR ATTORNEY REVIEW.
12/20/2023	7	450.00	2.40	\$	1,080.00	STRATEGIZE REGARDING DISCOVERY AND RELATED ISSUES; FOLLOW UP REGARDING SAME.
12/22/2023	7	450.00	1.4	\$	630.00	MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES AND MEET AND CONFER; FOLLOW UP REGARDING SAME.
12/27/2023	7	450.00	2.1	\$	945.00	MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES AND MEET AND CONFER IN PREPARATION FOR INFORMAL DISCOVERY CONFERENCE WITH COURT; REVIEW COURT ORDER REGARDING POSSIBLE NEED FOR TRIAL PLAN.
12/28/2023	7	450.00	2.60	\$	1,170.00	PREPARE FOR AND PARTICIPATE IN TELEPHONE CONFERENCE WITH OPPOSING COUNSEL REGARDING MEET AND CONFER ON DISCOVERY ISSUES AND POSSIBLE TRIAL PLAN; FOLLOW UP REGARDING ISSUES FOR TRIAL PLAN; BEGIN OUTLINE OF BRIEF FOR COURT DISCOVERY CONFERENCE.
12/29/2023	7	450.00	4.50	\$	2,025.00	PREPARE BRIEF IN SUPPORT OF DISCOVERY CONFERENCE WITH COURT; REVIEW BRIEF FILED BY DEFENDANT; FOLLOW UP REGARDING SAME.
1/2/2024	7	450.00	2.4	\$	1,080.00	STRATEGIZE REGARDING DISCOVERY DISPUTE AND UPCOMING COURT HEARING REGARDING INFORMAL DISCOVERY CONFERENCE; FOLLOW UP REGARDING POTENTIAL DEPOSITIONS AND TRIAL PLAN.
1/4/2024	7	450.00	2.4	\$	1,080.00	PREPARE FOR AND PARTICIPATE IN INFORMAL DISCOVERY CONFERENCE WITH COURT REGARDING DISCOVERY DISPUTE; CORRESPOND WITH OPPOSING COUNSEL REGARDING PRO HAC VICE AND DISCOVERY ISSUES.
1/4/2024	11	450.00	1.30	\$	585.00	STRATEGIZE REGARDING DISCOVERY PLAN AND COURT DISCOVERY CONFERENCE AND INSTRUCTIONS TO TEAM REGARDING SAME, FOLLOWING REVIEW OF BOTH SIDES' MEET AND CONFER CORRESPONDENCE.
1/5/2024	7	450.00	1.10	\$	495.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES AND CASE MANAGEMENT; FOLLOW UP REGARDING DISCOVERY ISSUES POST-INFORMAL DISCOVERY CONFERENCE HEARING.
1/9/2024	7	450.00	2.1	\$	945.00	STRATEGIZE REGARDING OUTSTANDING DISCOVERY ISSUES STILL IN DISPUTE; FOLLOW UP REGARDING SAME.

1/10/2024	7	450.00	1.5	\$	675.00	PREPARE FOR AND PARTICIPATE IN TELEPHONE MEET AND CONFER WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES POST INFORMAL DISCOVERY CONFERENCE.
1/11/2024	7	450.00	0.70	\$	315.00	STRATEGIZE REGARDING OUTSTANDING DISCOVERY ISSUES.
1/18/2024	7	450.00	0.50	\$	225.00	REVIEW ESTRADA DECISION AND IMPACT ON MANAGEABILITY ARGUMENT OF PAGA CLAIM RAISED BY DEFENDANT ON RESPONSE TO DISCOVERY REQUESTS.
1/22/2024	11	450.00	1.30	\$	585.00	INSTRUCTIONS TO TEAM REGARDING SETTLEMENT DATES SET BY THE COURT AND PLANS FOR SAME.
1/22/2024	7	450.00	3.1	\$	1,395.00	MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING STATUS; PREPARE JOINT STATUS CONFERENCE STATEMENT; FOLLOW UP REGARDING SAME; STRATEGIZE REGARDING DISCOVERY ISSUES.
1/23/2024	7	450.00	1	\$	450.00	PREPARE AND FINALIZE JOINT STATUS CONFERENCE STATEMENT; MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING SAME; FOLLOW UP REGARDING SAME.
1/29/2024	7	450.00	0.2	\$	90.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING POTENTIAL MEDIATION.
1/30/2024	7	450.00	0.8	\$	360.00	PREPARE FOR AND APPEAR AT CASE MANAGEMENT CONFERENCE.
2/2/2024	11	450.00	1	\$	450.00	STRATEGIZE REGARDING CASE STATUS; MULTIPLE COMMUNICATIONS WITH CLIENT REGARDING CASE FILES AND PLANS FOR SAME.
2/5/2024	11	450.00	0.1	\$	45.00	CORRESPOND WITH CLIENT REGARDING MEDIATION INSTRUCTIONS.
2/8/2024	7	450.00	4.1	\$	1,845.00	REVIEW DEFENDANT'S SECOND SUPPLEMENTAL DISCOVERY RESPONSES; ANALYSIS REGARDING DEFENDANT'S RECENT DOCUMENT PRODUCTION; CORRESPOND WITH T. KENNEDY REGARDING SAME; ANALYSIS OF NEEDED FURTHER MEET AND CONFER REGARDING DISCOVERY RESPONSES; ANALYSIS REGARDING CLAIMS AND EVIDENCE.
2/9/2024	7	450.00	2.1	\$	945.00	FURTHER STRATEGY REGARDING DISCOVERY AND NEXT STEPS.
2/12/2024	7	450.00	0.70	\$	315.00	FOLLOW UP REGARDING CLAIMS AND FACTUAL SUPPORT.
2/12/2024	43	450.00	1.40	\$	630.00	REVIEW AND ANALYZE EXTENSIVE CASE PLEADINGS IN PREPARATION FOR MEET AND CONFER CORRESPONDENCE WITH OPPOSING COUNSEL.
2/13/2024	7	450.00	2.00	\$	900.00	REVIEW DISCOVERY RESPONSES AND CLAIMS FROM PLAINTIFF; DEVELOP STRUCTURE FOR CASE MEMO AND FACTUAL DEVELOPMENT; CONFER WITH COUNSEL REGARDING MASTER CASE MEMO AND ANALYSIS OF CLAIMS AND EVIDENCE TO PROVE CLAIMS.
2/14/2024	7	450.00	2.60	\$	1,170.00	REVIEW CORRESPONDENCE FROM OPPOSING COUNSEL REGARDING MEETING AND CONFERRING ON COMPLAINT AND DEFENDANT'S POTENTIAL MOTION TO STRIKE/DEMURRER; RESEARCH REGARDING LEGAL ISSUES RAISED; FOLLOW UP REGARDING SAME.

2/15/2024	7	450.00	1.20	\$	540.00	MEET AND CONFER RESEARCH ON COMPLAINT AND DEFENDANT'S THREATENED MOTION TO STRIKE/DEMURRER.
2/16/2024	11	450.00	1.50	\$	675.00	REVIEW CORRESPONDENCE FROM CLIENT REGARDING NOTICE RECEIVED FROM RTI REGARDING VOID NONCOMPETE PER BUSINESS AND PROFESSIONS CODE SECTION 16600.1 AND ADVISE CLIENT REGARDING SAME.
2/16/2024	7	450.00	1.60	\$	720.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING MEET AND CONFER ON POTENTIAL DEMURRER, MOTION TO STRIKE; ANALYSIS REGARDING ARGUMENTS RAISED BY REFINED TECHNOLOGY.
2/19/2024	43	450.00	2.5	\$	1,125.00	REVIEW AND ANALYZE DEFENDANT'S EXTENSIVE MEET AND CONFER LETTER; RESEARCH VIABILITY OF DEFENDANT'S CLAIMS REGARDING EACH ITEM IN MEET AND CONFER LETTER; PREPARE RESPONSES TO EACH OF PLAINTIFF'S MEET AND CONFER ITEMS.
2/20/2024	11	450.00	1.00	\$	450.00	STRATEGIZE REGARDING DISCOVERY CONFERENCE WITH OPPOSING COUNSEL, REVIEW THEIR ARGUMENTS, AND DISCUSS POTENTIAL AMENDED PLEADING AND RESPONSES TO SAME, AND INSTRUCTIONS TO TEAM REGARDING NEXT STEPS.
2/20/2024	7	450.00	3.60	\$	1,620.00	ADDITIONAL RESEARCH REGARDING MEET AND CONFER ON SECOND AMENDED COMPLAINT AND PLEADING PAGA CLAIMS; TELEPHONE CONFERENCE REGARDING SAME; ORGANIZE OUTLINE OF RESPONSIVE IN PREPARATION FOR TELEPHONE CONFERENCE WITH OPPOSING COUNSEL.
2/20/2024	43	450.00	0.6	\$	270.00	PREPARE BRIEF MEMORANDUM REGARDING DEFENDANT'S MEET AND CONFER LETTER IN PREPARATION FOR TELEPHONE ARGUMENTS.
2/21/2024	7	450.00	2.00	\$	900.00	PREPARE FOR AND PARTICIPATE IN MEET AND CONFER TELEPHONE CONFERENCE WITH OPPOSING COUNSEL REGARDING POTENTIAL AMENDED COMPLAINT; FOLLOW UP REGARDING SAME.
2/21/2024	43	450.00	0.7	\$	315.00	VIDEO CONFERENCE WITH OPPOSING COUNSEL REGARDING EXTENSIVE MEET AND CONFER CORRESPONDENCE; STRATEGIZE ADDITIONAL RESPONSES AND POTENTIAL AMENDMENTS TO THE COMPLAINT.
2/22/2024	7	450.00	1.10	\$	495.00	ANALYSIS REGARDING POTENTIAL THIRD AMENDED COMPLAINT; FOLLOW UP REGARDING LEGAL ISSUES.
2/23/2024	7	450.00	1.20	\$	540.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING THIRD AMENDED COMPLAINT; PREPARE STIPULATION AND PROPOSED ORDER REGARDING RESPONSE DATE; FOLLOW UP REGARDING SAME.
2/23/2024	43	450.00	0.70	\$	315.00	RESEARCH PLAINTIFF'S RIGHT TO PAGA PENALTIES UNDER LABOR CODE SECTION 204 DESPITE RECEIPT OF WAGE STATEMENTS IN A TIMELY MANNER.

2/26/2024	7	450.00	3.2	\$	1,440.00	ANALYSIS REGARDING THIRD AMENDED COMPLAINT; FOLLOW UP REGARDING SAME; REVIEW ORDER REGARDING STIPULATION TO FILE THIRD AMENDED COMPLAINT; STRATEGIZE REGARDING DISCOVERY ISSUES AND CLASS DATA.
2/27/2024	45	200	2.6	\$	520.00	COMBINE AND CATEGORIZE DEFENDANT'S DOCUMENT PRODUCTION, DTI-PAGA 001154-008049, FOR ATTORNEY REVIEW.
2/27/2024	7	450.00	4.00	\$	1,800.00	PREPARE THIRD AMENDED COMPLAINT; RESEARCH REGARDING LEGAL ISSUES RAISED BY DEFENDANT.
2/28/2024	7	450.00	3.3	\$	1,485.00	ADDITIONAL PREPARATION OF THIRD AMENDED COMPLAINT; FOLLOW UP ON DISCOVERY ISSUES.
2/29/2024	7	450.00	3.10	\$	1,395.00	ADDITIONAL PREPARATION OF THIRD AMENDED COMPLAINT; RESEARCH REGARDING CLAIMS AND STANDARDS.
3/5/2024	7	450.00	1.10	\$	495.00	FINALIZE THIRD AMENDED COMPLAINT; FOLLOW UP REGARDING SAME.
3/5/2024	43	450.00	2.40	\$	1,080.00	ANALYZE ALL LABOR CODE CLAIMS MADE IN THIRD AMENDED COMPLAINT; RESEARCH CIVIL PENALTIES ALLOWED UNDER EACH LABOR CODE STATUTE; IDENTIFY ALL POSSIBLE PENALTIES FOR THIRD AMENDED COMPLAINT; STRATEGIZE AMENDMENTS TO COMPLAINT TO SATISFY MEET AND CONFER OBLIGATIONS WITH DEFENDANT.
3/6/2024	43	450.00	2.20	\$	990.00	PREPARE MEMORANDUM REGARDING PENALTIES UNDER THE PRIVATE ATTORNEY GENERAL ACT FOR PLAINTIFF YOUNG'S LABOR CODE CLAIMS AGAINST DEFENDANT REQUIRED BY THE PARTIES' MEET AND CONFER CORRESPONDENCE.
3/6/2024	7	450.00	0.50	\$	225.00	ANALYSIS OF MEMORANDUM REGARDING CIVIL PENALTIES FOR LABOR CODE VIOLATION ALLEGED; FOLLOW UP REGARDING SAME.
3/7/2024	7	450.00	0.60	\$	270.00	ANALYSIS OF THIRD AMENDED COMPLAINT; FOLLOW UP REGARDING DISCOVERY ISSUES.
3/7/2024	11	450.00	1.8	\$	810.00	CORRESPOND WITH CLIENT REGARDING DRAFT THIRD AMENDED COMPLAINT AND UPDATE WITH TEAM REGARDING SAME.
3/8/2024	11	450.00	1.4	\$	630.00	TELEPHONE CALL WITH CLIENT REGARDING APPROVAL FOR AMENDED PLEADING AND UPDATES REGARDING SAME.
3/8/2024	7	450.00	0.20	\$	90.00	FINALIZE THIRD AMENDED COMPLAINT FOR FILING; FOLLOW UP REGARDING SAME.
4/17/2024	7	450.00	0.30	\$	135.00	REVIEW ANSWER TO THIRD AMENDED COMPLAINT.
5/7/2024	7	450.00	1.1	\$	495.00	PREPARE JOINT STATUS CONFERENCE STATEMENT; FOLLOW UP REGARDING SAME; CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME.
5/8/2024	7	450.00	0.5	\$	225.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING FINALIZING JOINT STATUS CONFERENCE STATEMENT.

5/15/2024	7	450.00	0.6	\$	270.00	PREPARE FOR AND ATTEND CASE MANAGEMENT CONFERENCE WITH COURT.
5/16/2024	7	450.00	0.1	\$	45.00	REVIEW NOTICE OF ORDER REGARDING TRIAL DATE AND CASE MANAGEMENT CONFERENCE.
6/12/2024	76	450.00	0.50	\$	225.00	PARTICIPATE IN TELECONFERENCE TO DISCUSS LITIGATION STRATEGY AND UPCOMING CASE NEEDS.
6/12/2024	76	450.00	4.50	\$	2,025.00	INTENSIVE REVIEW OF ACTIVE FILE TO PREPARE ONGOING LITIGATION STRATEGY AND NEXT DISCOVERY STEPS.
6/12/2024	7	450.00	1.00	\$	450.00	STRATEGIZE REGARDING FACTUAL DEVELOPMENT AND CASE STATUS; TELEPHONE CONFERENCE WITH T. BECK REGARDING SAME; FOLLOW UP REGARDING SAME.
6/13/2024	76	450.00	2.30	\$	1,035.00	CONTINUED INTENSIVE REVIEW OF ACTIVE FILE TO PREPARE ONGOING LITIGATION STRATEGY AND NEXT DISCOVERY STEPS.
6/13/2024	45	200.00	1.70	\$	340.00	PREPARE DEFENDANT'S PAGA DOCUMENT PRODUCTION, FTI-PAGA_08050 - FTI-PAGA_10548, FOR USE IN LITIGATION.
6/13/2024	45	200.00	2.4	\$	480.00	ORGANIZE DEFENDANT DOCUMENT PRODUCTION INTO INDIVIDUAL EMPLOYEE FOLDERS FOR USE IN LITIGATION.
6/13/2024	45	200.00	8.7	\$	1,740.00	REORGANIZE DEFENDANT DOCUMENT PRODUCTION INTO INDIVIDUAL EMPLOYEE FOLDER FOR USE IN LITIGATION.
6/13/2024	45	200.00	2.50	\$	500.00	PREPARE CATEGORIZED DOCUMENT PRODUCTION FOR USE IN LITIGATION.
6/13/2024	45	200.00	0.40	\$	80.00	PREPARE DOCUMENT PRODUCTION INDIVIDUAL EMPLOYEE RECORDS FOR USE IN LITIGATION.
6/13/2024	45	200.00	1.90	\$	380.00	DISTRIBUTE DEFENDANT DOCUMENT PRODUCTION INTO INDIVIDUAL EMPLOYEE FOLDERS FOR USE IN LITIGATION.
6/13/2024	45	200.00	1.30	\$	260.00	PREPARE CATEGORIZED DOCUMENT PRODUCTION FOR USE IN LITIGATION.
6/14/2024	76	450.00	4.10	\$	1,845.00	CONTINUED INTENSIVE REVIEW OF ACTIVE FILE TO PREPARE ONGOING LITIGATION STRATEGY AND NEXT DISCOVERY STEPS.
6/17/2024	76	450.00	1.80	\$	810.00	REVIEW DOCUMENTS TO PULL OUT VARIOUS POLICIES AT ISSUE, TO BE USED DURING DEPOSITIONS AND TRIAL.
6/18/2024	76	450.00	0.90	\$	405.00	CONTINUED REVIEW OF PRODUCED DOCUMENTS.
6/19/2024	11	450.00	0.6	\$	270.00	REVIEW MINUTE ORDER AND CORRESPOND WITH CLIENT REGARDING PLANS FOR DISCOVERY WITH RTI.
6/20/2024	11	450.00	0.6	\$	270.00	CORRESPOND WITH CLIENT REGARDING DISCOVERY PLANS AND UPDATE WITH CLIENTS REGARDING SAME.
6/20/2024	76	450.00	0.60	\$	270.00	TELECONFERENCE TO DISCUSS CASE.
6/20/2024	76	450.00	0.60	\$	270.00	PREPARE PAGA NOTICE LETTER TO WITNESSES.
6/21/2024	76	450.00	5.30	\$	2,385.00	CONTINUED PREPARATION OF LETTER TO AGGRIEVED EMPLOYEES.

6/21/2024	11	450.00	1.20	\$	540.00	PREPARE FOR AND ATTEND TELEPHONE CALL WITH CLIENT REGARDING CASE STRATEGY, AND UPDATE WITH LITIGATION TEAM REGARDING SAME.
6/24/2024	76	450.00	2.80	\$	1,260.00	REVIEW PRIOR DISCOVERY REQUESTS TO ASSESS ADDITIONAL DISCOVERY REQUESTS FOR EMPLOYEES THAT WORKED IN CALIFORNIA - BEYOND CALIFORNIA EMPLOYEES - AND FATIGUE POLICY DETAILS.
6/25/2024	76	450.00	1.10	\$	495.00	PREPARE FURTHER DISCOVERY REQUESTS, SET TWO OF SPECIAL INTERROGATORIES AND REQUESTS FOR PRODUCTION - TO REQUEST INFORMATION ON OTHER POTENTIAL EMPLOYEES.
6/27/2024	7	450.00	0.5	\$	225.00	REVIEW DRAFT LETTER TO AGGRIEVED EMPLOYEES; STRATEGIZE WITH T. BECK REGARDING SAME.
6/27/2024	76	450.00	0.10	\$	45.00	TELECONFERENCE TO DISCUSS AGGRIEVED EMPLOYEE LETTER.
6/27/2024	76	450.00	0.30	\$	135.00	REVIEW REVISIONS TO LETTER TO PREPARE FOR SENDING TO ALL KNOWN POTENTIALLY AGGRIEVED EMPLOYEES.
7/1/2024	76	450.00	0.90	\$	405.00	REVIEW INDIVIDUAL WITNESSES FILES THAT HAVE BEEN ASSEMBLED SO FAR.
7/2/2024	11	450.00	0.80	\$	360.00	REVIEW AND REVISE LETTER TO BE SENT TO PUTATIVE CLASS AND CORRESPOND REGARDING SAME.
7/3/2024	7	450.00	0.6	\$	270.00	FOLLOW UP REGARDING LETTER TO AGGRIEVED EMPLOYEES; RESEARCH REGARDING PAGA PERIOD.
7/3/2024	76	450.00	0.20	\$	90.00	TELECONFERENCE TO FURTHER DISCUSS LETTER TO AGGRIEVED EMPLOYEES.
7/3/2024	76	450.00	0.40	\$	180.00	FINAL REVIEW OF LETTER TO AGGRIEVED EMPLOYEES.
7/3/2024	45	200.00	2.00	\$	400.00	PREPARE DEFENDANT'S DOCUMENT PRODUCTION INTO INDIVIDUAL EMPLOYEE FOLDERS FOR USE IN LITIGATION.
7/3/2024	45	200.00	1.3	\$	260.00	ORGANIZE DEFENDANT'S DOCUMENT PRODUCTION INTO INDIVIDUAL CLASS MEMBERS FOR USE IN LITIGATION.
7/6/2024	11	450.00	0.60	\$	270.00	REVIEW REVISED LETTER AND CORRESPONDENCE FROM TEAM TO FINALIZE, AND INSTRUCTIONS TO TEAM REGARDING SAME.
7/8/2024	76	450.00	0.30	\$	135.00	REVIEW FINAL LETTER TO BE SENT TO AGGRIEVED EMPLOYEES AND PREPARE LETTERS TO BE SENT OUT VIA EMAIL AND PHYSICAL MAIL.
7/9/2024	76	450.00	0.10	\$	45.00	CORRESPONDENCE TO CLIENT AND INFORM CLIENT ABOUT AGGRIEVED EMPLOYEE LETTER.
7/9/2024	76	450.00	0.90	\$	405.00	REVIEW RESPONSES IN PREPARATION FOR WITNESS STATEMENTS.
7/9/2024	76	450.00	0.40	\$	180.00	STRATEGY AND ANALYSIS REGARDING POTENTIALLY AGGRIEVED EMPLOYEES THAT RESPOND TO LETTER.
7/10/2024	76	450.00	1.50	\$	675.00	RESEARCH NOVEL PAGA RELATED ISSUE IN FURTHERANCE OF SPEAKING TO POTENTIALLY AGGRIEVED EMPLOYEES.

7/11/2024	7	450.00	1.5	\$	675.00	REVIEW REGARDING EMPLOYEE CONTACTS REGARDING RESPONDING TO INQUIRY LETTERS; FOLLOW UP REGARDING SAME; CONFER WITH TEAM REGARDING SAME.
7/11/2024	76	450.00	0.40	\$	180.00	STRATEGY AND ANALYSIS REGARDING AGGRIEVED EMPLOYEE STATEMENTS.
7/11/2024	45	200.00	1.5	\$	300.00	ORGANIZE AND PREPARE DEFENDANT'S DOCUMENT PRODUCTION FOR USE IN LITIGATION.
7/12/2024	76	450.00	1.50	\$	675.00	BEGIN REVIEW OF FILE OF INDIVIDUAL POTENTIALLY AGGRIEVED EMPLOYEES THAT HAVE SEPARATED INTO DISTINCT FOLDERS IN PREPARATION OF WITNESS INTERVIEWS.
7/12/2024	45	200.00	2.20	\$	440.00	REVIEW DOCUMENT PRODUCTION AND PULL EMPLOYEE FILES IN PREPARATION FOR USE IN LITIGATION.
7/15/2024	76	450.00	1.60	\$	720.00	CONTINUED REVIEW OF WITNESS FILES.
7/22/2024	7	450.00	0.5	\$	225.00	REVIEW REGARDING WITNESS STATEMENTS AND CALLS FROM FORMER EMPLOYEES; FOLLOW UP REGARDING SAME.
7/26/2024	7	450.00	0.30	\$	135.00	REVIEW REGARDING WITNESS INTERVIEWS AND AGGRIEVED EMPLOYEE STATEMENTS.
7/26/2024	76	450.00	0.50	\$	225.00	PREPARE FOR WITNESS INTERVIEW WITH POTENTIAL AGGRIEVED EMPLOYEE
7/26/2024	76	450.00	0.70	\$	315.00	WITNESS INTERVIEW WITH AGGRIEVED EMPLOYEE
7/26/2024	76	450.00	0.40	\$	180.00	REVIEW FILE FOR POTENTIAL AGGRIEVED EMPLOYEE
8/16/2024	45	200.00	2.60	\$	520.00	PREPARE 11,000 PAGES OF DOCUMENT PRODUCTION FOR REVIEW IN SEARCH OF CLASS MEMBER PAY RECORDS FOR USE IN LITIGATION.
8/19/2024	45	200.00	4.20	\$	840.00	REVIEW PAY RECORD PRODUCTION, RTI-PAGA_009535- RTI-PAGA_013567, AND PULL RECORDS FOR CLASS MEMBERS B. BLASKOVICH THROUGH J. HEIMILLER, IN PREPARATION FOR USE IN LITIGATION.
8/20/2024	45	200.00	3.00	\$	600.00	REVIEW PAY RECORD PRODUCTION, RTI-PAGA_009535- RTI-PAGA_013567, AND PULL RECORDS FOR CLASS MEMBERS A. HUMBLE THROUGH S. SCHMID, IN PREPARATION FOR USE IN LITIGATION.
8/21/2024	76	450.00	2.20	\$	990.00	REVIEW EACH EMPLOYEE RECORD TO BREAK DOWN DEPOSITIONS.
8/21/2024	45	200.00	3.10	\$	620.00	REVIEW PAY RECORD PRODUCTION, RTI-PAGA_009535- RTI-PAGA_013567, AND PULL RECORDS FOR CLASS MEMBERS C. SEALS THROUGH J. YOUNG, IN PREPARATION FOR USE IN LITIGATION.
8/21/2024	45	200.00	3.00	\$	600.00	REVIEW PAY RECORD PRODUCTION, RTI-PAGA_013568- RTI-PAGA_017566, AND PULL RECORDS FOR CLASS MEMBERS J. ALCARAZ THROUGH H. FERNANDEZ, IN PREPARATION FOR USE IN LITIGATION.
8/22/2024	76	450.00	5.20	\$	2,340.00	REVIEW EACH EMPLOYEE RECORD TO BREAK DOWN DEPOSITIONS.

8/23/2024	45	200.00	1.50	\$	300.00	REVIEW PAY RECORD PRODUCTION, RTI-PAGA_013568- RTI-PAGA_017566, AND PULL RECORDS FOR CLASS MEMBERS T. FORESTER THROUGH N. JESSEN, IN PREPARATION FOR USE IN LITIGATION.
8/23/2024	45	200.00	2.70	\$	540.00	REVIEW PAY RECORD PRODUCTION, RTI-PAGA_013568- RTI-PAGA_017566, AND PULL RECORDS FOR CLASS MEMBERS T. JOHNSON THROUGH B. O'BRIEN, IN PREPARATION FOR USE IN LITIGATION.
8/23/2024	76	450.00	5.70	\$	2,565.00	CONTINUED REVIEW OF AGGREIVED EMPLOYEES.
8/23/2024	7	450.00	0.60	\$	270.00	FOLLOW UP ON EVIDENTIARY ISSUES AND CLAIMS BY EACH PAGA MEMBER.
8/26/2024	76	450.00	5.40	\$	2,430.00	CONTINUED REVIEW OF AGGRIEVED EMPLOYEE FILES.
8/27/2024	45	200.00	2.90	\$	580.00	REVIEW PAY RECORD PRODUCTION, RTI-PAGA_013568- RTI-PAGA_017566, AND PULL RECORDS FOR CLASS MEMBERS T. O'BRIEN THROUGH J. YOUNG, IN PREPARATION FOR USE IN LITIGATION.
8/27/2024	76	450.00	1.50	\$	675.00	CONTINUED REVIEW OF DOCUMENTS.
8/30/2024	7	450.00	0.40	\$	180.00	REVIEW JOINT CASE MANAGEMENT CONFERENCE STATEMENT; CORRESPONDENCE WITH J. BECK REGARDING DEPOSITION SCHEDULING AND DISCOVERY.
8/30/2024	76	450.00	0.90	\$	405.00	STRATEGY AND ANALYSIS FOR UPCOMING DEPOSITONS AND PREPARE UPDATED JOINT CASE MANAGEMENT CONFERENCE STATEMENT.
9/3/2024	11	450.00	1.20	\$	540.00	STRATEGIZE REGARDING NEXT STEPS AND CORRESPOND WITH CLIENT REGARDING CASE UPDATE, INCLUDING OVERVIEW OF THE CASE.
9/3/2024	76	450.00	0.90	\$	405.00	FINALIZE JOINT STATUS REPORT AND SEND DRAFT TO DEFENDANT.
9/3/2024	76	450.00	1.90	\$	855.00	PREPARE DEPOSITIONS NOTICES OF FIVE KEY RTI EXECUTIVES.
9/3/2024	7	450.00	1.5	\$	675.00	REVIEW DRAFT JOINT CASE MANAGEMENT CONFERENCE; FOLLOW UP ON DISCOVERY AND DEPOSITIONS; STRATEGIZE WITH T. BECK REGARDING DEPOSITION SCHEDULE AND OTHER DISCOVERY ISSUES; FOLLOW UP WITH OPPOSING COUNSEL REGARDING SAME.
9/3/2024	76	450.00	0.70	\$	315.00	REVIEW PRIOR MATTER DESPOSTION TRANSCRIPTS TO DETERMINE FURTHER POTENTIAL WITNESSES.
9/3/2024	76	450.00	0.30	\$	135.00	REVIEW DEFENDANT'S DISCOVERY RESPONSES.
9/4/2024	11	450.00	2.30	\$	1,035.00	REVIEW CORRESPONDENCE REGARDING CASE DISCOVERY AND PLANS FROM OPPOSING COUNSEL; CORRESPOND WITH CLIENT REGARDING NEXT STEPS; INSTRUCTIONS TO TEAM ON DEPOSITIONS FOR DISCOVERY AND MEDIATION PREPARATION PURPOSES.
9/4/2024	45	200.00	1.60	\$	320.00	PULL WAGE STATEMENTS FROM DOC PRODUCTION RTI-PAGA_017567 - RTI-PAGA_020611, FOR CLASS MEMBERS J. ALCARAZ TO J. FOX, FOR USE IN LITIGATION.
9/5/2024	11	450.00	2.00	\$	900.00	PREPARE FOR CLIENT UPDATE MEETING; CORRESPOND WITH CLIENT REGARDING MEETING DETAILS AND AGENDA.

9/5/2024	45	200.00	2.00	\$	400.00	REVIEW DOCUMENT PRODUCTION RTI-PAGA_017567 - RTI-PAGA_020611, AND PULL PAYSTUB RECORDS FOR CLASS MEMBERS T. MCCARVER THROUGH J. YOUNG.
9/5/2024	45	200.00	2.30	\$	460.00	REVIEW DOCUMENT PRODUCTION RTI-PAGA_017567 - RTI-PAGA_020611, AND PULL PAYSTUB RECORDS FOR CLASS MEMBERS J. FRANKS THROUGH C. MAYTUBBY.
9/6/2024	11	450.00	1	\$	450.00	PREPARE FOR UPDATE CALL; ATTEND TEAM CALL ON PROGRESS OF THE LITIGATION.
9/6/2024	7	450.00	0.30	\$	135.00	STRATEGIZE WITH J. EGLEY REGARDING CASE STATUS AND STRATEGY.
9/9/2024	7	450.00	0.50	\$	225.00	PREPARE FOR AND ATTEND STATUS CONFERENCE; FOLLOW UP REGARDING SAME.
9/10/2024	11	450.00	0.70	\$	315.00	REVIEW COURT MINUTE ORDER AND CORRESPONDENCE REGARDING SAME.
9/16/2024	7	450.00	0.20	\$	90.00	STRATEGIZE REGARDING DISCOVERY ISSUES.
9/16/2024	76	450.00	2.20	\$	990.00	PREPARE DEPOSITION OUTLINE.
9/17/2024	7	450.00	1.30	\$	585.00	REVIEW REGARDING DISCOVERY RESPONSES; FOLLOW UP REGARDING SAME.
9/17/2024	76	450.00	2.50	\$	1,125.00	PREPARE DISCOVERY RESPONSES.
9/18/2024	76	450.00	7.30	\$	3,285.00	PREPARE DISCOVERY RESPONSES.
9/18/2024	45	200.00	4	\$	800.00	PREPARE INDIVIDUAL PAYSTUBS FOR EMPLOYEES J. ALCARAZ THROUGH J. HALBROOK FOR USE IN LITIGATION AND PRODUCTION.
9/19/2024	7	450.00	0.80	\$	360.00	REVIEW DEPOSITION OBJECTION FROM PLAINTIFF; PREPARE MEET AND CONFER; FOLLOWUP WITH OPPOSING COUNSEL; STRATEGIZE REGARDING DISCOVERY ISSUES.
9/19/2024	45	200.00	2.7	\$	540.00	ORGANIZE AND PREPARE PAYSTUB RECORDS FOR INDIVIDUAL EMPLOYEES WITH BATES AND PAY DATES FOR USE IN LITIGATION AND PRODUCTION.
9/19/2024	76	450.00	1.20	\$	540.00	PREPARE DISCOVERY RESPONSES.
9/19/2024	76	450.00	0.40	\$	180.00	STRATEGY AND ANALYSIS REGARDING CASE ASSESSMENT AND DEPOSITIONS.
9/20/2024	7	450.00	0.40	\$	180.00	MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING DISCOVERY AND DEPOSITION MEET AND CONFER AND RELATED DISCOVERY DISPUTES.
9/20/2024	45	200.00	3.7	\$	740.00	ORGANIZE AND PREPARE PAYSTUB RECORDS FOR EMPLOYEES J. HALLBROOK THROUGH J. SALAS FOR USE IN LITIGATION AND PRODUCTION.
9/20/2024	76	450.00	4.80	\$	2,160.00	REVIEW FILES TO PREPARE CASE ASSESSMENT.
9/23/2024	45	200.00	3	\$	600.00	ORGANIZE AND PREPARE PAYSTUB RECORDS FOR EMPLOYEES S. SCHMID THROUGH J. YOUNG FOR USE IN LITIGATION AND PRODUCTION.

9/24/2024	45	200.00	3.60	\$	720.00	CATEGORIZE AND PREPARE RTI DOCUMENT PRODUCTION 1-153, 303-1920, FOR PRODUCTION.
9/24/2024	11	450.00	0.50	\$	225.00	REVIEW AND INSTRUCTIONS REGARDING DISCOVERY RESPONSES.
9/25/2024	45	200.00	0.50	\$	100.00	CATEGORIZE RTI PRODUCTION, RTI-000154 - RTI-000303, IN PREPARATION FOR DOCUMENT PRODUCTION.
9/26/2024	45	200.00	0.90	\$	180.00	CATEGORIZE PLAINTIFF DOCUMENT PRODUCTION, RTI-000154 - RTI-000301, AND PREPARE PAGA LETTERS TO INDIVIDUAL CLASS MEMBERS FOR DOCUMENT PRODUCTION.
9/26/2024	45	200.00	0.40	\$	80.00	REVIEW PAY RECORDS PREPARED FOR USE IN LITIGATION AND REVISE DATES AND BATES FILES NAMES FOR USE IN PRODUCTION.
9/26/2024	76	450.00	2.7	\$	1,215.00	REVIEW DOCUMENTS FOR PRODUCTION IN PREPARATION OF RESPONSE TO DEFENDANT'S REQUEST FOR PRODUCTION.
9/26/2024	76	450.00	0.5	\$	225.00	PREPARE SPECIAL INTERROGATORIES TO REQUEST ADDRESSES OF DEONENTS.
9/26/2024	76	450.00	0.30	\$	135.00	REVIEW AMENDED DEPOSITION NOTICES.
9/26/2024	7	450.00	2.4	\$	1,080.00	MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING DEPOSITIONS AND DISCOVERY ISSUES; REVIEW SPECIAL INTERROGATORIES, SET 2; ATTENTION TO REVISED DEPOSITION NOTICES.
9/27/2024	45	200.00	1.80	\$	360.00	PREPARE DOCUMENT PRODUCTION, YOUNG 000001 - YOUNG 002364.
9/27/2024	76	450.00	0.4	\$	180.00	FINAL REVIEW OF DEPOSITION NOTICES ON CONFIRMED DATES.
9/27/2024	7	450.00	2.3	\$	1,035.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES; CORRESPOND WITH T. BECK REGARDING DEPOSITION NOTICES AND FOLLOW UP; STRATEGIZE REGARDING EVIDENTIARY PROOF.
9/27/2024	76	450.00	4.2	\$	1,890.00	FINALIZE DISCOVERY RESPONSES FOR REQUESTS FOR PRODUCTION, AND INTERROGATORIES - FORM & SPECIAL.
9/30/2024	76	450.00	0.10	\$	45.00	STRATEGY AND ANALYSIS REGARDING PLAINTIFF'S DISCOVERY RESPONSES AND MEET AND CONFER WITH PLAINTIFF'S COUNSEL IN EFFORT TO SECURE A TWO-WEEK EXTENTION.
9/30/2024	11	450.00	1.80	\$	810.00	TELEPHONE CONFERENCE WITH J. YOUNG REGARDING
10/1/2024	11	450.00	0.4	\$	180.00	REVIEW CORRESPONDENCE REGARDING DEPOSITION AND UPDATES REGARDING DISCOVERY.
10/1/2024	7	450.00	2.1	\$	945.00	STRATEGIZE REGARDING DISCOVERY ISSUES AND DEPOSITION; REVIEW REGARDING PLAINTIFF'S WRITTEN DISCOVERY RESPONSES.
10/2/2024	76	450.00	5.90	\$	2,655.00	CONTINUE PREPARATION OF CASE ASSESSMENT.
10/3/2024	45	200	1	\$	200.00	REVIEW DEFENDANT'S DOCUMENT PRODUCTIONS FOR JOB DESCRIPTIONS LISTED IN SECOND AMENDED RESPONSE TO SPECIAL INTERROGATORIES.
10/3/2024	7	450.00	2.1	\$	945.00	REVIEW DRAFT DISCOVERY RESPONSES; FOLLOW UP REGARDING SAME.
10/3/2024	76	450.00	5.60	\$	2,520.00	CONTINUE TO RESEARCH, REVIEW, AND PREPARE CASE ASSESSMENT.

10/4/2024	7	450.00	1.30	\$	585.00	STRATEGIZE REGARDING DISCOVERY ISSUES AND RESPONSES; FINALIZE DISCOVERY RESPONSES; FINALIZE SUPPLEMENTAL DISCOVERY REQUESTS TO PLAINTIFF.
10/4/2024	76	450.00	0.10	\$	45.00	STRATEGY AND ANALYSIS REGARDING REVISIONS TO YOUNG'S DISCOVERY RESPONSES TO RTI'S REQUESTS.
10/4/2024	76	450.00	0.80	\$	360.00	FINALIZE DISCOVERY AND PREPARE VERIFICATIONS.
10/4/2024	76	450.00	0.20	\$	90.00	REVIEW REQUESTS TO SUPPLEMENT DISCOVERY RESPONSES.
10/7/2024	7	450.00	0.4	\$	180.00	CORRESPOND WITH PLAINTIFF'S COUNSEL REGARDING DISCOVERY ISSUES; FOLLOW UP REGARDING SAME; FOLLOW UP ON DISCOVERY ISSUES.
10/7/2024	76	450.00	1.20	\$	540.00	REVIEW REGARDING DISCOVERY AND FACTUAL ISSUES AND EVIDENCE.
10/9/2024	11	450.00	1.00	\$	450.00	STRATEGIZE REGARDING J. YOUNG DISCOVERY, AND CORRESPOND AND FOLLOW UP REGARDING SAME.
10/10/2024	7	450.00	2.5	\$	1,125.00	TELEPHONE CONFERENCE WITH J. YOUNG REGARDING DISCOVERY RESPONSE; FINALIZE DISCOVERY RESPONSES; STRATEGIZE REGARDING FACTUAL DEVELOPMENT AND CASE.
10/11/2024	76	450.00	0.20	\$	90.00	REVIEW R. MILLER'S AMENDED DEPOSITION NOTICE.
10/14/2024	7	450.00	1.20	\$	540.00	REVIEW REGARDING DISCOVERY AND FACTUAL ISSUES AND EVIDENCE.
10/15/2024	7	450.00	1.2	\$	540.00	REVIEW MEET AND CONFER CORRESPONDENCE FROM OPPOSING COUNSEL REGARDING DISCOVERY ISSUES; FOLLOW UP REGARDING SAME.
10/16/2024	76	450.00	6.2	\$	2,790.00	REVIEW PRODUCED DOCUMENTS FOR CONFIDENTIAL & ATTORNEY EYES ONLY.
10/16/2024	76	450.00	0.40	\$	180.00	STRATEGY AND ANALYSIS CALL REGARDING MASTER MEMORANDUM, AND PLAINTIFF'S MEET AND CONFER LETTER REGARDING PROTECTIVE ORDER DOCUMENTS PRODUCED.
10/16/2024	7	450.00	1.40	\$	630.00	STRATEGIZE REGARDING DISCOVERY ISSUES.
10/16/2024	45	200.00	1.5	\$	300.00	REVIEW PAGA PRODUCTIONS FOR DUPLICATION OF PRODUCED KEY DOCUMENTS IN NON-PAGA PRODUCTIONS.
10/17/2024	76	450.00	1.00	\$	450.00	PREPARE REQUESTS FOR PRODUCTION.
10/17/2024	7	450.00	0.60	\$	270.00	MULTIPLE COMMUNICATIONS WITH T. BECK REGARDING DOCUMENT PRODUCTION ISSUES AND MEET AND CONFER; REVIEW REGARDING DISCOVERY NEEDS.
10/17/2024	45	200.00	1.8	\$	360.00	REVIEW PAGA PRODUCTION FOR KEY DOCUMENTS PRODUCED BY PLAINTIFF.
10/18/2024	76	450.00	2.10	\$	945.00	PREPARE REQUESTS FOR PRODUCTION.
10/18/2024	76	450.00	4.50	\$	2,025.00	CONTINUE PREPARATION OF MASTER CASE ASSESSMENT MEMORANDUM.

10/18/2024	7	-	450.00	2.40	\$	1,080.00	REVIEW ADDITIONAL MEET AND CONFER LETTERS FROM PLAINTIFF'S COUNSEL REGARDING DISCOVERY RESPONSES; STRATEGIZE REGARDING DISCOVERY AND TRIAL EVIDENCE; CORRESPOND WITH OPPOSING COUNSEL REGARDING STATUS OF COURT ORDERED MEDIATION.
10/18/2024	11		450.00	0.60	\$	270.00	STRATEGIZE REGARDING NEXT STEPS AND REVIEW LETTERS REGARDING DISCOVERY MEET AND CONFER.
10/21/2024	76		450.00	6.90	\$	3,105.00	CONTINUED CASE ASSESSMENT PREPARATION.
10/22/2024	7		450.00	1.2	\$	540.00	STRATEGIZE REGARDING MEET AND CONFER AND OTHER DISCOVERY ISSUES; MULTIPLE TELEPHONE CONFERENCES WITH OPPOSING COUNSEL REGARDING STATUS; FOLLOW UP REGARDING SAME.
10/23/2024	7		450.00	1.3	\$	585.00	STRATEGIZE REGARDING DISCOVERY ISSUES; MULTIPLE COMMUNICATIONS WITH T. BECK REGARDING SAME; CORRESPOND WITH OPPOSING COUNSEL REGARDING MEDIATORS; FOLLOW UP REGARDING SAME.
10/23/2024	76		450.00	0.60	\$	270.00	DRAFT MEET AND CONFER RESPONSE TO RTI'S LETTER REGARDING PLAINTIFF'S DOCUMENT PRODUCTION.
10/23/2024	76		450.00	1.60	\$	720.00	PREPARE DEPOSITION OUTLINE.
10/23/2024	11		450.00	1.20	\$	540.00	STRATEGIZE REGARDING MEDIATION OPTIONS AND UPDATE WITH TEAM REGARDING SAME, INCLUDING APPROACH FOR MEDIATOR SELECTION AND TASKS TO BE COMPLETED PRIOR TO MEDIATION.
10/24/2024	7		450.00	3.9	\$	1,755.00	MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING MEET AND CONFER ON DISCOVERY; STRATEGIZE WITH T. BECK REGARDING DEPOSITION OUTLINES FOR UPCOMING DEPOSITIONS; TELEPHONE CONFERENCE WITH J. SWICK REGARDING MEET AND CONFER ON DISCOVERY; CORRESPOND REGARDING POTENTIAL MEDIATORS.
10/24/2024	76		450.00	3.9	\$	1,755.00	PREPARE DEPOSITION OUTLINE.
10/24/2024	76		450.00	1.4	\$	630.00	PARTICIPATE IN MEET AND CONFER PROCESS AND REVIEW DOCUMENTS AT ISSUE IN PLAINTIFF'S PRODUCTION.
10/24/2024	76		450.00	0.4	\$	180.00	FINALIZE REQUESTS FOR PRODUCTION SET 2.
10/24/2024	76		450.00	0.30	\$	135.00	MEET AND CONFER CALL REGARDING DOCUMENTS.
10/24/2024	76		450.00	0.70	\$	315.00	STRATEGY AND ANALYSIS REGARDING NEXT STEPS.
10/24/2024	76		450.00	0.10	\$	45.00	CALL WITH CLIENT.
10/25/2024	7		450.00	2.1	\$	945.00	MULTIPLE MEET AND CONFER COMMUNICATIONS REGARDING DISCOVERY ISSUES; FOLLOW UP REGARDING SAME; STRATEGIZE REGARDING DEPOSITION TOPICS AND OUTLINES.
10/25/2024	76		450.00	2.9	\$	1,305.00	CONTINUE DEPOSITION PREPARATION.
10/25/2024	45		200.00	0.50	\$	100.00	REVIEW DEFENDANT PRODUCTIONS FOR UNSIGNED AGREEMENTS.
10/28/2024	76		450.00	4.80	\$	2,160.00	CONTINUE DEPOSITION PREPARATION.
10/28/2024	76	-	450.00	0.80	\$	360.00	CONTINUE DEPOSITION PREPARATION.

10/29/2024	76	450.00	3.60	\$	1,620.00	CONTINUED DEPOSITION PREPARATION.
10/30/2024	76	450.00	1.90	\$	855.00	REVIEW PAYSTUBS FOR ADDITIONAL DISCOVERY.
10/31/2024	76	450	0.3	\$	135.00	STRATEGY AND ANALYSIS FOR NEXT MEET AND CONFER REGARDING PRODUCTION.
10/31/2024	7	450.00	0.70	\$	315.00	STRATEGIZE REGARDING DISCOVERY AND DEPOSITION ISSUES.
11/1/2024	7	450.00	0.70	\$	315.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING CASE STATUS; FOLLOW UP ON DISCOVERY ISSUES.
11/4/2024	45	200	0.3	\$	60.00	COMBINE KEY PRODUCED DOCUMENTS FOR MEET AND CONFER.
11/4/2024	76	450.00	1.20	\$	540.00	REVIEW RECORDS FOR TIME WITHIN THE RELEVANT TIME PERIOD.
11/5/2024	7	450.00	0.40	\$	180.00	STRATEGIZE REGARDING DISCOVERY DISPUTES; REVIEW CORRESPOND WITH OPPOSING COUNSEL REGARDING DISCOVERY DISPUTES.
11/5/2024	76	450.00	3.30	\$	1,485.00	CONTINUE REVIEW OF DOCUMENTS FOR STRATEGY AND ANALYSIS OF CASE ASSESSMENT AND POTENTIAL NEED FOR EXPERT REVIEW.
11/6/2024	45	200.00	2.40	\$	480.00	PULL KEY DOCUMENTS FROM PRODUCTION TO SEND TO CLIENT, RECREATE PRODUCTION, YOUNG 000001-YOUNG 000991, AND CREATE LIST OF DOCUMENTS TO BE DESTROYED.
11/6/2024	7	450	3.3	\$	1,485.00	STRATEGIZE REGARDING DISCOVERY DISPUTES; REVIEW DISCOVERY RESPONSES; PREPARE CASE MEMORANDUM AND DEPOSITION OUTLINES.
11/6/2024	76	450.00	1.50	\$	675.00	STRATEGY AND ANALYSIS IN ADVANCE OF MEET AND CONFER.
11/6/2024	76	450.00	2.80	\$	1,260.00	PREPARE ADDITIONAL DISCOVERY REQUESTS.
11/6/2024	11	450.00	0.40	\$	180.00	CORRESPOND REGARDING DISCOVERY AND INSTRUCTIONS TO TEAM REGARDING MEET AND CONFER EFFORTS.
11/7/2024	7	450	1.2	\$	540.00	STRATEGIZE REGARDING DISCOVERY DISPUTES; CORRESPOND WITH OPPOSING COUNSEL REGARDING MEDIATOR; FOLLOW UP REGARDING CASE STATUS AND FACTUAL ISSUES.
11/7/2024	76	450.00	4.70	\$	2,115.00	PREPARE LETTER REGARDING COPIES OF DOCUMENTS; REVIEW DOCUMENTS TO BE MAILED TO RTI COUNSEL; PREPARE FOR MEET AND CONFER CALL WITH COUNSEL.
11/7/2024	76	450.00	0.50	\$	225.00	MEET AND CONFER CALL WITH DEFENDANT'S COUNSEL.
11/7/2024	76	450.00	0.30	\$	135.00	POST-MEET AND CONFER STRATEGY AND ANALYSIS.
11/7/2024	76	450.00	0.60	\$	270.00	POST MEET AND CONFER REVIEW OF PRIOR PROTECTIVE ORDER AND RESEARCH ATTORNEY FEES ISSUE.
11/8/2024	7	450.00	1.50	\$	675.00	FOLLOW UP ON DISCOVERY DISPUTES; REVIEW CORRESPONDENCE REGARDING SAME; TELEPHONE CONFERENCE WITH T. BECK REGARDING DISCOVERY ISSUES.
11/8/2024	76	450.00	0.70	\$	315.00	REVIEW RTI'S SUPPLEMENTAL PRODUCTION.
11/8/2024	76	450.00	4.20	\$	1,890.00	MEET AND CONFER WITH RTI REGARDING OUTSTANDING ISSUES, PREPARE FURTHER MEET AND CONFER LETTER.

11/8/2024	45	200.00	2.10	\$	420.00	PULL HOT DOCUMENTS FROM ALL COPIES OF OPPOSING COUNSEL'S PRODUCTION IN FILE AND SHAREFILE LINKS TO BE DESTROYED.
11/11/2024	76	450.00	0.30	\$	135.00	PREPARE DECLARATION REGARDING DESTROYED DOCUMENTS AND CONFIRM DOCUMENTS HAVE BEEN DESTROYED.
11/11/2024	45	200.00	1.70	\$	340.00	REMOVE DOCUMENTS FOR DESTRUCTION FROM ALL COPIES OF DOCUMENT PRODUCTION YOUNG 000001-YOUNG 002364.
11/12/2024	7	450.00	0.30	\$	135.00	STRATEGIZE REGARDING DISCOVERY DISPUTE AND INFORMAL DISCOVERY CONFERENCE.
11/12/2024	76	450.00	0.10	\$	45.00	FINALIZE DECLARATION REGARDING DOCUMENT DESTRUCTION.
11/14/2024	7	450.00	2.00	\$	900.00	ANALYSIS OF DISCOVERY ISSUES; RESEARCH AND REVISE INFORMAL DISCOVERY CONFERENCE BRIEF.
11/14/2024	76	450.00	6.10	\$	2,745.00	PREPARE INFORMAL DISCOVERY CONFERENCE STATEMENT.
11/15/2024	7	450.00	0.50	\$	225.00	FINALIZE INFORMAL DISCOVERY CONFERENCE BRIEF; REVIEW INFORMAL DISCOVERY BRIEF FROM REFINED TECHNOLOGY; STRATEGIZE WITH T. BECK REGARDING SAME.
11/15/2024	76	450.00	1.20	\$	540.00	FINALIZE INFORMAL DISCOVERY CONFERENCE BRIEF.
11/15/2024	76	450.00	0.20	\$	90.00	SEND MEET AND CONFER REGARDING OUTSTANDING DISCOVERY ISSUES.
11/18/2024	76	450.00	1.90	\$	855.00	RESEARCH PAGA ATTORNEY FEES AUTHORITY.
11/19/2024	11	450.00	1.50	\$	675.00	REVIEW MEET AND CONFER EFFORTS AND CORRESPOND REGARDING SAME.
11/20/2024	7	450.00	2.60	\$	1,170.00	PREPARE FOR AND ATTEND INFORMAL DISCOVERY CONFERENCE; FOLLOW UP REGARDING SAME; STRATEGIZE REGARDING OUTSTANDING DISCOVERY ISSUES AND FACTUAL DEVELOPMENT.
11/20/2024	76	450.00	0.70	\$	315.00	REVIEW YOUNG DOCUMENTS IN ADVANCE OF INFORMAL DISCOVERY CONFERENCE.
11/20/2024	76	450.00	0.60	\$	270.00	STRATEGY AND ANALYSIS FOR CASE ASSESSMENT AND SUBPOENA.
11/20/2024	76	450.00	0.90	\$	405.00	ATTEND INFORMAL DISCOVERY CONFERENCE.
11/20/2024	76	450.00	0.40	\$	180.00	STRATEGY AND ANALYSIS POST INFORMAL DISCOVERY CONFERENCE AND WAYS TO SUPPLEMENT RESPONSES.
11/21/2024	45	200.00	1.60	\$	320.00	REVIEW LIST OF CLASS EMPLOYEES RESIDING IN CALIFORNIA AND CROSS-CHECK DATA WITH WESTLAW TO CONFIRM MOST RECENT ADDRESS IN ADVANCE OF DEPOSITION SUBPOENA SERVICE.
11/21/2024	76	450.00	0.70	\$	315.00	REVIEW WITNESS ADDRESSES TO ANALYZE DEPOSITION LOCATION OPTIONS.
11/21/2024	7	450.00	0.10	\$	45.00	REVIEW MINUTE ORDER FROM INFORMAL DISCOVERY CONFERENCE.
11/21/2024	7	450.00	0.30	\$	135.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING POTENTIAL MEDIATION AND SUPPLEMENTAL DISCOVERY RESPONSES.

11/22/2024	45	200.00	0.40	\$	80.00	PREPARE DRAFT SUBPOENA FOR DEPOSITION APPEARANCE WITH PRODUCTION OF DOCUMENTS, ATTACHMENT REQUESTING 7 CATEGORIES OF RECORDS, AND CORRESPONDENCE FOR DEONENTS TO BE SERVED ALONGSIDE SUBPOENAS.
11/22/2024	7	450.00	1.60	\$	720.00	STRATEGIZE REGARDING DISCOVERY ISSUES; REVIEW DEFENDANT'S RESPONSES TO SPECIAL INTERROGATORIES; STRATEGIZE REGARDING DEVELOPMENT OF MASTER MEMO AND CLAIM DEVELOPMENT.
11/22/2024	76	450.00	0.20	\$	90.00	CONTACT DLSE CONSULTING TO BE RETAINED AS AN EXPERT IN THIS MATTER.
11/22/2024	76	450.00	1.10	\$	495.00	REVIEW THIRD PARTY SUBPOENAS.
11/26/2024	11	450.00	1.50	\$	675.00	REVIEW DISCOVERY AND INFORMAL DISCOVERY CONFERENCE RESOLUTION ITEMS, AND ANALYZE NEXT STEPS AND PLANS FOR SAME.
11/27/2024	76	450.00	0.20	\$	90.00	REVIEW AMENDED DEPOSITION NOTICES.
11/27/2024	76	450.00	1.30	\$	585.00	REVIEW THIRD PARTY SUBPOENA OF POTENTIAL WITNESSES.
12/2/2024	76	450.00	0.30	\$	135.00	TELEPHONE CALL WITH POTENTIAL EXPERT DSLE CONSULTING AND FOLLOW-UP CORRESPONDENCE.
12/2/2024	76	450.00	0.30	\$	135.00	REVISE CASE ASSESSMENT.
12/3/2024	76	450.00	1.10	\$	495.00	PREPARE DEPOSITION OUTLINE FOR T. SCHUENENMANN.
12/5/2024	76	450.00	0.50	\$	225.00	REVIEW LIST OF THIRD-PARTY SUBPOENAS.
12/6/2024	7	450.00	2.2	\$	990.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING DISCOVERY AND DEPOSITIONS; STRATEGIZE REGARDING EVIDENCE AND DAMAGES.
12/6/2024	76	450.00	0.1	\$	45.00	CORRESPOND WITH COUNSEL REGARDING START TIME OF DECEMBER 10, 2024 DEPOSITION OF T. SCHUENENMANN.
12/6/2024	45	200.00	0.90	\$	180.00	DRAFT SUBPOENA FOR DEPOSITION WITH PRODUCTION OF DOCUMENTS FOR 13 EMPLOYEES.
12/9/2024	7	450.00	6.90	\$	3,105.00	FACTUAL DEVELOPMENT AND CASE MEMORANDUM; REVIEW EVIDENCE IN PREPARATION FOR DEPOSITION; STRATEGIZE WITH T. BECK REGARDING SAME.
12/9/2024	76	450.00	2.00	\$	900.00	STRATEGY AND ANALYSIS FOR DEPOSITION OF T. SCHUENENMANN CONTINUED TO DECEMBER 12, 2024.
12/9/2024	76	450.00	3.70	\$	1,665.00	REVIEW DOCUMENTS AND ASSEMBLE EXHIBITS FOR DECEMBER 12, 2024 DEPOSITION.
12/9/2024	76	450.00	0.10	\$	45.00	FINAL REVIEW OF THIRD PARTY SUBPOENA PRIOR TO SERVICE.
12/9/2024	76	450.00	0.70	\$	315.00	REVIEW OF THIRD PARTY SUBPOENAS.
12/9/2024	45	200.00	1.20	\$	240.00	FINALIZE SUBPOENAS FOR DEPOSITION WITH PRODUCTION OF DOCUMENTS AND ACCOMPANYING LETTERS FOR 13 DEONENTS AND PREPARE FOR SERVICE ON COUNSEL AND DEONENTS.

12/10/2024	7	450.00	7.10	\$	3,195.00	ADDITIONAL REVIEW OF FACTUAL BACKGROUND AND MASTER MEMORANDUM; REVIEW DEPOSITION OUTLINE FOR T. SCHUENENMANN.
12/10/2024	76	450.00	0.10	\$	45.00	STRATEGY AND ANALYSIS REGARDING SUBPOENA DATES.
12/10/2024	76	450.00	1.00	\$	450.00	PREPARE FOR CLIENT MEETING.
12/10/2024	76	450.00	1.50	\$	675.00	STRATEGY AND ANALYSIS MEETING WITH CLIENT.
12/10/2024	76	450.00	0.80	\$	360.00	PREPARE FOR DEPOSITION OF T. SCHUENENMANN.
12/11/2024	76	450.00	5.40	\$	2,430.00	CONTINUED DEPOSITION PREPARATION.
12/11/2024	7	450.00	4.10	\$	1,845.00	ASSIST WITH DEPOSITION PREPARATION; STRATEGIZE WITH T. BECK REGARDING SAME; STRATEGIZE REGARDING EVIDENTIARY ISSUES AND EVIDENCE.
12/11/2024	45	200.00	0.40	\$	80.00	DRAFT DEPOSITION SUBPOENA FOR APPEARANCE WITH DOCUMENTS ISSUED TO T. WHITNEY, AND LETTER TO ACCOMPANY SUBPOENA, FINALIZE DOCUMENTS AND SEND TO TITAN FOR SERVICE OF PROCESS.
12/12/2024	76	450.00	1.80	\$	810.00	FINAL PREPARATION FOR DEPOSITION OF T. SCHUENENMANN.
12/12/2024	76	450.00	7.10	\$	3,195.00	TAKE DEPOSITION OF T. SCHUENENMANN.
12/12/2024	76	450.00	0.60	\$	270.00	POST-DEPOSITION STRATEGY AND ANALYSIS REVIEW.
12/12/2024	7	450.00	0.60	\$	270.00	CORRESPOND WITH POTENTIAL MEDIATOR; FOLLOW UP REGARDING SAME; STRATEGIZE REGARDING DISCOVERY ISSUES.
12/12/2024	45	200.00	1.20	\$	240.00	SEPARATE AND CATEGORIZE PAYSTUBS AND PAY SUMMARY RECORDS FROM DEFENDANT'S RTI-PAGA_020846-026436.
12/12/2024	45	200.00	3.70	\$	740.00	SEPARATE AND CATEGORIZE AND RENAME PAY RECORDS FOR EMPLOYEES J. ALCARAZ THROUGH J. BENHAM.
12/13/2024	7	450.00	3.50	\$	1,575.00	STRATEGIZE WITH T. BECK REGARDING DISCOVERY ISSUES AND DEPOSITION OUTLINES; STRATEGIZE REGARDING EXPERT DOCUMENT NEEDS; FOLLOW UP ON DISCOVERY ISSUES.
12/13/2024	76	450.00	1.50	\$	675.00	UPDATE CASE MEMORANDUM BASED ON TESTIMONY.
12/13/2024	76	450.00	1.00	\$	450.00	STRATEGY AND ANALYSIS OF NEXT STEPS POST-DEPOSITION.
12/13/2024	76	450.00	1.30	\$	585.00	PREPARE SPECIAL INTERROGATORIES SET 3.
12/13/2024	11	450.00	0.50	\$	225.00	CORRESPOND WITH CLIENT AND TEAM REGARDING SUBPOENAS AND CONTACT INFORMATION REQUESTED AND CONFIRMATIONS REGARDING SAME.
12/16/2024	7	450.00	3.40	\$	1,530.00	STRATEGIZE REGARDING DISCOVERY AND SUBPOENAS TO AGGRIEVED EMPLOYEES; FOLLOW UP REGARDING SAME.
12/16/2024	76	450.00	0.70	\$	315.00	FINALIZE SPECIAL INTERROGATORY SET 3.
12/16/2024	76	450.00	4.10	\$	1,845.00	PREPARE AMENDED DISCOVERY RESPONSES.
12/16/2024	45	200.00	1.90	\$	380.00	SEPARATE AND ORGANIZE PAYSTUB RECORDS FROM DEFENDANT'S DOCUMENT PRODUCTION RTI-PAGA_008050 - RIT-PAGA_020611.

12/16/2024	45	200.00	0.40	\$	80.00	CORRESPOND WITH TITAN LEGAL SERVICES REGARDING UPDATE ON ALL DEPOSITION SUBPOENAS' STATUSES, AND UPDATE TRIAL TEAM ON STATUS OF SERVICES.
12/16/2024	45	200.00	0.30	\$	60.00	REVIEW DEFENDANT DOCUMENT PRODUCTIONS FOR PLAINTIFF'S PAY RECORDS.
12/16/2024	45	200.00	0.20	\$	40.00	RESEARCH WITNESS D. GUZMAN'S ADDRESS FOR ALTERNATIVE LOCATION TO ATTEMPT SERVICE OF PROCESS.
12/16/2024	45	200.00	1.30	\$	260.00	SEPARATE, CATEGORIZE, AND RENAME, PAY RECORDS FOR CLASS FROM DEFENDANT'S DOCUMENT PRODUCTION, RTI-PAGA_008050-020611.
12/17/2024	7	450.00	4.10	\$	1,845.00	STRATEGIZE WITH T. BECK REGARDING DEPOSITIONS; REVIEW AND REVISE AMENDED DISCOVERY RESPONSES.
12/17/2024	76	450.00	3.50	\$	1,575.00	PREPARE AMENDED DISCOVERY RESPONSES.
12/17/2024	76	450.00	3.30	\$	1,485.00	PREPARE DEPOSITION OUTLINE FOR R. MILLER.
12/17/2024	45	200.00	3.50	\$	700.00	SEPARATE AND CATEGORIZE CLASS TIMESHEETS AND PAYSTUB RECORDS FROM DEFENDANT'S DOCUMENT PRODUCTION, RTI-PAGA_020612-020845.
12/17/2024	45	200.00	3.50	\$	700.00	SEPARATE AND CATEGORIZE TIME RECORD FROM DEFENDANT'S DOCUMENT PRODUCTION RTI-PAGA_021995-023999.
12/17/2024	45	200.00	3.50	\$	700.00	REVIEW AND REVISE PAYSTUB RECORDS FOR DEFENDANT'S DOCUMENT PRODUCTION RTI-PAGA_008050-020611.
12/17/2024	77	200.00	0.40	\$	80.00	ANALYSIS OF FILES FOR PRODUCTION.
12/18/2024	76	450.00	2.30	\$	1,035.00	FINAL PREPARATION FOR R. MILLER DEPOSITION.
12/18/2024	76	450.00	7.20	\$	3,240.00	ATTEND DEPOSITION OF R. MILLER.
12/18/2024	45	200.00	8.80	\$	1,760.00	SEPARATE, CATEGORIZE, AND RENAME, PAYSTUB, TIME SHEET, AND PAY SUMMARY RECORDS FROM DEFENDANT'S DOCUMENT PRODUCTION, RTI-PAGA_008050-020611.
12/19/2024	76	450.00	0.90	\$	405.00	POST R. MILLER DEPOSITION STRATEGY AND ANALYSIS.
12/19/2024	76	450.00	3.00	\$	1,350.00	REVISE AMENDED DISCOVERY RESPONSES.
12/19/2024	76	450.00	1.10	\$	495.00	PREPARE REQUESTS FOR PRODUCTION OF DOCUMENTS, SET 4.
12/19/2024	45	200.00	0.20	\$	40.00	REVIEW CORRESPONDENCE FOR AMENDED DOCUMENT PRODUCTION, YOUNG 1-991.
12/19/2024	45	200.00	6.20	\$	1,240.00	SEPARATE, RENAME AND CATEGORIZE PAYROLL AND TIME SHEET DOCUMENTS FROM DEFENDANT'S DOCUMENT PRODUCTION RTI-PAGA_008050-020611.
12/19/2024	7	450.00	1.20	\$	540.00	STRATEGIZE REGARDING DISCOVERY AND ADDITIONAL RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS.
12/19/2024	77	200.00	1.00	\$	200.00	ANALYSIS OF FILES FOR PRODUCTION.
12/20/2024	76	450.00	1.30	\$	585.00	REVIEW UPDATED SUPPLEMENTAL DISCOVERY.
12/20/2024	76	450.00	1.6	\$	720.00	PREPARE RESPONSIVE CORRESPONDENCE REGARDING SUBPOENA'D EMPLOYEES; AND CALL POTENTIAL WITNESSES.

12/20/2024	76	450.00	0.4	\$	180.00	FINAL REVIEW OF AMENDED DISCOVERY RESPONSES.
12/20/2024	11	450.00	0.5	\$	225.00	REVIEW CORRESPONDENCE AND INSTRUCTIONS TO TEAM REGARDING NEXT STEPS FOR CASE EVALUATION THAT IS NEEDED PRIOR TO ANY MEDIATION IF THE OTHER SIDE WANTS TO RESOLVE AND SETTLE THE PENDING CASE.
12/20/2024	7	450.00	1.7	\$	765.00	MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING SUBPOENAS AND DISCOVERY ISSUES; FINALIZED DISCOVERY ISSUES; FOLLOW UP ON DISCOVERY ISSUES.
12/20/2024	45	200.00	8.80	\$	1,760.00	SEPARATE, CATEGORIZE, AND RENAME PAY AND TIME RECORDS FROM DEFENDANT'S DOCUMENT PRODUCTIONS, RTI-PAGA_008050-020611, RTI-PAGA_020612-020845, AND UPDATE INDIVIDUAL CLASS MEMBER FOLDERS.
12/23/2024	7	450.00	0.9	\$	405.00	MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES; STRATEGIZE REGARDING DEPOSITION SCHEDULING AND DISCOVERY NEEDS.
12/24/2024	7	450.00	0.5	\$	225.00	PREPARE CORRESPONDENCE TO J. SWICK REGARDING DEPOSITION SCHEDULING.
12/30/2024	76	450.00	0.30	\$	135.00	STRATEGY AND ANALYSIS FOR UPCOMING MEET AND CONFER CALL.
12/30/2024	76	450.00	0.70	\$	315.00	REVIEW SUBPOENAS SENT FOR JANUARY.
12/30/2024	45	200.00	3.10	\$	620.00	SEPARATE, CATEGORIZE, AND RENAME PAY AND TIME RECORDS FROM DEFENDANT'S DOCUMENT PRODUCTIONS, RTI-PAGA_008050-020611, RTI-PAGA_020612-020845, AND UPDATE INDIVIDUAL CLASS MEMBER FOLDERS.
12/30/2024	7	450.00	0.60	\$	270.00	MULTIPLE CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING DEPOSITION SCHEDULING; TELECONFERENCE WITH T. BECK REGARDING DEPOSITIONS AND TRIAL PREPARATION.
12/31/2024	76	450.00	2.10	\$	945.00	PREPARE WITNESS EMPLOYEE OUTLINE FOR DEPOSITION.
12/31/2024	45	200.00	4.80	\$	960.00	REVIEW AND CATEGORIZE EXPENSE REPORTS FROM DEFENDANT'S DOCUMENT PRODUCTION RTI-PAGA_024000-026435, RENAME AND SEPARATE INTO INDIVIDUAL CLASS MEMBER FOLDER.
12/31/2024	45	200.00	0.50	\$	100.00	FINALIZE DRAFT NOTICES OF DEPOSITION FOR J. SALAS, D. RICCABONO, AND SERVICE ON COUNSEL.
1/2/2025	7	450.00	3.20	\$	1,440.00	PREPARE FOR MEET AND CONFER CALL WITH J. SWICK REGARDING DEPOSITIONS AND DISCOVERY ISSUES; FOLLOW UP REGARDING SAME.
1/2/2025	76	450.00	1.40	\$	630.00	PREPARE FOR MEET AND CONFER CALL.
1/2/2025	76	450.00	0.60	\$	270.00	MEET AND CONFER CALL REGARDING DEPOSITIONS.
1/2/2025	76	450.00	1.50	\$	675.00	STRATEGY AND ANALYSIS FOR REVISED DEPOSITION SCHEDULE.
1/3/2025	7	450.00	0.50	\$	225.00	STRATEGIZE REGARDING DISCOVERY ISSUES; MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES, SCHEDULING AND OBJECTIONS.
1/3/2025	76	450.00	5.50	\$	2,475.00	PREPARE DEPOSITION OUTLINE FOR INDIVIDUAL WITNESSES.

1/6/2025	7	450.00	0.20	\$	90.00	COMMUNICATE WITH COUNSEL REGARDING DEPOSITION SCHEDULING.
1/6/2025	76	450.00	0.90	\$	405.00	CONTINUE PREPARATION OF WITNESS OUTLINE.
1/6/2025	76	450.00	1.30	\$	585.00	STRATEGY AND ANALYSIS OF UPCOMING DEPOSITIONS SCHEDULE.
1/7/2025	11	450.00	1.50	\$	675.00	REVIEW DISCOVERY AND FOLLOW UP WITH TEAM AND PLANS REGARDING SAME; CORRESPOND REGARDING NEXT STEPS FOR RESPONSES, INCLUDING PLAN FOR PURSUING POTENTIAL CLAIMS ON AN INDIVIDUAL BASIS INCLUDING PURSUING ARBITRATION DEMAND.
1/7/2025	7	450.00	0.6	\$	270.00	STRATEGIZE REGARDING DEPOSITION ISSUES AND TOPICS.
1/7/2025	76	450.00	0.10	\$	45.00	STRATEGY AND ANALYSIS FOR CHANGE IN DEPOSITION SCHEDULE.
1/7/2025	76	450.00	1.20	\$	540.00	DEPOSITION PREPARATION.
1/8/2025	7	450.00	0.5	\$	225.00	FURTHER ANALYSIS OF DEFENDANT'S REQUESTS FOR PRODUCTION OF DOCUMENTS, SET 2 AND SPECIAL INTERROGATORIES, SET 2; FOLLOW UP REGARDING SAME.
1/8/2025	45	200.00	0.4	\$	80.00	PREAPARE 11 AMENDED DEPOSITION SUBPOENAS FOR CLASS MEMBER EMPLOYEES FOR IN PERSON AND REMOTE DEPOSITIONS.
1/10/2025	76	450.00	0.20	\$	90.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING DEPOSITIONS.
1/13/2025	7	450.00	0.50	\$	225.00	CONFER WITH T. BECK REGARDING DISCOVERY AND EXPERT ISSUES; FOLLOW UP REGARDING SAME.
1/13/2025	45	200.00	0.4	\$	80.00	UPDATE CLASS MEMBER FOLDER WITH AMENDED DEPOSITION SUBPOENA AND UPDATE CHART TRACKING ALL SUBPOENAS.
1/13/2025	76	450.00	0.30	\$	135.00	STRATEGY AND ANALYSIS REGARDING UPCOMING DEPOSITIONS.
1/13/2025	76	450.00	2.40	\$	1,080.00	REVISE WITNESS OUTLINE.
1/14/2025	45	200.00	2.50	\$	500.00	REVIEW CLASS EMPLOYEE PAY AND TIME RECORD AND UPDATE SPREADSHEET WITH DATE RANGES OF PRODUCED DATA.
1/14/2025	76	450.00	0.30	\$	135.00	REVIEW STATUS OF C. HAAKER SUBPOENA.
1/15/2025	7	450.00	2.8	\$	1,260.00	STRATEGIZE REGARDING DISCOVERY ISSUES, EXPERT ISSUES, AND DEPOSITION SCHEDULING; PREPARE JOINT STATUS REPORT AND CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME.
1/15/2025	76	450.00	0.40	\$	180.00	STRATEGY AND ANALYSIS REGARDING YOUNG'S DEPOSITION.
1/15/2025	76	450.00	1.00	\$	450.00	STRATEGY AND ANALYSIS REGARDING CONFLICTING DEPOSITION DATES.
1/15/2025	76	450.00	0.40	\$	180.00	PREPARE LEGAL OBLIGATION LETTER FOR CLIENT'S EMPLOYER.
1/15/2025	76	450.00	0.20	\$	90.00	REVIEW JOINT STATEMENT.
1/15/2025	76	450.00	0.60	\$	270.00	PREPARE OUTLINE FOR WITNESS DEPOSITIONS.
1/16/2025	45	200.00	3.10	\$	620.00	INDEX PAY AND TIME RECORD RECEIVED FROM OPPOSING COUNSEL AND PREPARE RECORDS FOR REVIEW BY EXPERT D. GOEL FOR CLASS EMPLOYEES.

1/16/2025	7	450.00	2.4	\$	1,080.00	MULTIPLE COMMUNICATIONS WITH J. SWICK REGARDING DEPOSITION AND JOINT STATUS REPORT; REVIEW ORDER REGARDING JOINT STATUS REPORT; REVIEW REGARDING EXPERT REPORT AND DATA; CORRESPOND REGARDING MEDIATION DATES.
1/16/2025	76	450.00	0.50	\$	225.00	FINALIZE LETTER FOR CLIENT.
1/16/2025	76	450.00	2.40	\$	1,080.00	CONTINUE PREPARATION OF WITNESS OUTLINES.
1/16/2025	76	450.00	0.50	\$	225.00	STRATEGY AND ANALYSIS FOR EXPERT REVIEW OF DOCUMENTS.
1/16/2025	76	450.00	0.30	\$	135.00	STRATEGY AND ANALYSIS REGARDING MEDIATION.
1/17/2025	7	450.00	0.40	\$	180.00	STRATEGIZE REGARDING MEDIATION SCHEDULING AND PREPARATION.
1/17/2025	76	450.00	0.20	\$	90.00	STRATEGY AND ANALYSIS REGARDING DOCUMENTS TO BE SENT TO EXPERT.
1/17/2025	76	450.00	1.20	\$	540.00	STRATEGY AND ANALYSIS FOR EXPERT QUESTIONS.
1/17/2025	45	200.00	1.90	\$	380.00	PREPARE PAY AND TIME RECORDS FOR CLASS EMPLOYEES FOR SERVICE TO EXPERT D. GOEL FOR ANALYSIS, COMBINE AND UPLOAD TO SHAREFILE, AND TEST LINK.
1/17/2025	45	200.00	3.40	\$	680.00	REVIEW CLASS AGREEMENTS, PAY AND TIME RECORDS, FOR EMPLOYEES, UPDATING INDEX OF MISSING DATA RANGES FOR FOLLOW UP WITH CLIENT.
1/21/2025	76	450.00	3.10	\$	1,395.00	PREPARATION FOR 1/22 DEPOSITIONS.
1/21/2025	7	450.00	0.50	\$	225.00	STRATEGIZE WITH T. BECK REGARDING DISCOVERY AND EXPERT ISSUES.
1/21/2025	45	200.00	2.00	\$	400.00	ORGANIZE AND PREPARE DEPOSITION EXHIBITS FOR J. ALCARAZ AND J. BEARD.
1/22/2025	11	450.00	0.80	\$	360.00	STRATEGIZE REGARDING RTI PRESSURE POINTS AND DEPOSITION PLANS, INCLUDING POSSIBLE INDIVIDUAL ACTIONS.
1/22/2025	7	450.00	3.20	\$	1,440.00	PREPARE FOR AND PARTICIPATE IN DEPOSITION PREPARATION FOR PLAINTIFF'S DEPOSITION; CORRESPOND WITH J. SWIFT REGARDING DEPOSITIONS AND DISCOVERY ISSUES.
1/22/2025	76	450.00	2.90	\$	1,305.00	FINAL PREPARATION FOR WITNESS DEPOSITIONS.
1/22/2025	76	450.00	0.60	\$	270.00	DEPOSITION OF JAMES BRIAN BEARD.
1/22/2025	76	450.00	2.10	\$	945.00	FINAL PREPARATION FOR WITNESS J. ALCARAZ DEPOSITION.
1/22/2025	76	450.00	4.40	\$	1,980.00	DEPOSITION OF J. ALCARAZ.
1/22/2025	76	450.00	0.40	\$	180.00	POST DEPOSITIONS STRATEGY AND ANALYSIS.
1/23/2025	7	450.00	2.10	\$	945.00	PREPARE FOR AND ATTEND FURTHER STATUS CONFERENCE; FOLLOW UP REGARDING SAME; PREPARE FOR AND PARTICIPATE IN TELEPHONE CONFERENCE WITH EXPERT; STRATEGIZE REGARDING EXPERT NEEDS.
1/23/2025	76	450.00	0.80	\$	360.00	CONFERENCE CALL WITH EXPERTS; AND STRATEGY AND ANALYSIS.
1/23/2025	76	450.00	1.30	\$	585.00	PREPARE FOR L. HOPKINS DEPOSITION.

1/23/2025	11	450.00	0.20	\$	90.00	REVIEW CORRESPONDENCE FROM OPPOSING COUNSEL REGARDING DEPOSITIONS AND DISCOVERY, AND INSTRUCTIONS TO TEAM REGARDING SAME.
1/24/2025	76	450.00	0.20	\$	90.00	CORRESPOND REGARDING DEPOSITION RESCHEDULING.
1/24/2025	76	450.00	0.70	\$	315.00	CONTINUE PREPARATION FOR L. HOPKINS DEPOSITIONS.
1/24/2025	7	450.00	1.20	\$	540.00	STRATEGIZE REGARDING DEPOSITION AND DISCOVERY ISSUES; FOLLOW UP ON EXPERT ISSUES.
1/27/2025	11	450.00	1.50	\$	675.00	REVIEW MINUTE ORDER ABOUT TRIAL PLAN, STRATEGIZE REGARDING SAME, AND UPDATE REGARDING CASE TASKS INCLUDING DEPOSITIONS.
1/27/2025	76	450.00	0.90	\$	405.00	PREPARE FOR DEPOSITION OF L. HOPKINS.
1/27/2025	76	450.00	4.60	\$	2,070.00	DEPOSITION OF L. HOPKINS.
1/27/2025	76	450.00	1.00	\$	450.00	POST DEPOSITION STRATEGY AND ANALYSIS.
1/27/2025	7	450.00	0.60	\$	270.00	MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING DEPOSITIONS; CORRESPOND WITH EXPERT REGARDING DATA ANALYSIS.
1/28/2025	76	450.00	0.20	\$	90.00	STRATEGY AND ANALYSIS REGARDING DOCUMENTS.
1/28/2025	7	450.00	2.5	\$	1,125.00	CORRESPOND WITH J. YOUNG REGARDING DEPOSITION PREPARATION; FOLLOW UP ON CASE DISCOVERY ISSUES; FURTHER REVIEW OF DEFENDANT'S DISCOVERY RESPONSES AND NEED FOR MEET AND CONFER AND FOLLOW UP; REVIEW REGARDING DAMAGE CALCULATIONS.
1/29/2025	76	450.00	2.40	\$	1,080.00	PREPARE FOR T. WHITNEY'S DEPOSITION.
1/29/2025	45	200.00	0.60	\$	120.00	REVIEW DOCUMENTS PRODUCED BY DEFENDANT REGARDING EMPLOYEES BASED IN CALIFORNIA AND SECURE NON-SOLICITATION AGREEMENTS.
1/29/2025	7	450.00	0.3	\$	135.00	CORRESPOND REGARDING DISCOVERY AND DEPOSITIONS.
1/30/2025	76	450.00	5.40	\$	2,430.00	REVIEW RTI'S DISCOVERY RESPONSES TO PLAINTIFF'S REQUESTS FOR PRODUCTION AND SPECIAL INTERROGATORIES AND PREPARE MEET AND CONFER LETTER FOR DEFICIENT RESPONSES.
1/30/2025	76	450.00	0.20	\$	90.00	CONTACT J. BEARD.
1/30/2025	76	450.00	1.20	\$	540.00	PREPARE FOR T. WHITNEY'S DEPOSITION.
1/30/2025	76	450.00	0.20	\$	90.00	STRATEGY AND ANALYSIS WITH UPCOMING DEPOSITIONS AND EXPERT DAMAGE CALCULATIONS.
1/30/2025	45	200.00	3.30	\$	660.00	REVIEW DEFENDANT DISCOVERY RESPONSES AND CREATE MEMORANDUM OF ALL REQUESTS, RESPONSES, AND AMENDED RESPONSES.
1/30/2025	45	200.00	0.40	\$	80.00	REVIEW AND CONSOLIDATE NON-SOLICITATION AGREEMENTS IN PREPARATION FOR DAMAGES CALCULATION.
1/31/2025	45	200.00	1.00	\$	200.00	REVIEW DEFENDANT RESPONSES TO DISCOVERY AND UPDATE MEMORANDUM WITH AMENDED RESPONSES.
1/31/2025	76	450.00	0.70	\$	315.00	PREPARE FOR DEPOSITION OF T. WHITNEY.
1/31/2025	76	450.00	3.50	\$	1,575.00	DEPOSITION OF T. WHITNEY.

1/31/2025	76	450.00	1.20	\$	540.00	POST DEPOSITION STRATEGY AND ANALYSIS.
1/31/2025	76	450.00	0.60	\$	270.00	CONTINUE PREPARATION OF MEET AND CONFER LETTER.
1/31/2025	7	450.00	0.50	\$	225.00	CORRESPOND WITH J. SWICK REGARDING DISCOVERY ISSUES AND DEADLINES; STRATEGIZE WITH T. BECK REGARDING DISCOVERY AND DEPOSITIONS.
2/1/2025	7	450.00	3.10	\$	1,395.00	PREPARE FOR DEPOSITION WITH J. YOUNG; CONDUCT DEPOSITION PREPARATION WITH J. YOUNG; FOLLOW UP REGARDING SAME.
2/1/2025	45	200.00	0.50	\$	100.00	CALCULATE PAY PERIOD VIOLATIONS FOR PRE-PAGA COMPLAINT AND 2023 NON-SOLICITATION AGREEMENTS FOR ALL EMPLOYEES BASED IN CALIFORNIA.
2/3/2025	7	450.00	3.5	\$	1,575.00	TRAVEL TO OAKLAND FOR PLAINTIFF'S DEPOSITION; REVISE MEET AND CONFER LETTER REGARDING DEFENDANT'S DISCOVERY RESPONSES.
2/3/2025	76	450.00	1.30	\$	585.00	FINALIZE MEET AND CONFER LETTER REGARDING RTI'S DISCOVERY RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET FOUR AND SPECIAL INTERROGATORIES, SET THREE.
2/3/2025	76	450.00	0.80	\$	360.00	STRATEGY AND ANALYSIS OVER REVISED DEPOSITION SCHEDULE.
2/3/2025	45	200.00	0.40	\$	80.00	REVIEW RTI'S SECOND AMENDED RESPONSES TO REQUESTS FOR PRODUCTION, SET ONE, AND NOTE RESPONSE IN MEMORANDUM OF DISCOVERY RESPONSES.
2/4/2025	45	200.00	0.5	\$	100.00	REVIEW RTI'S SECOND AMENDED RESPONSES TO PLAINTIFF'S SPECIAL INTERROGATORIES, SET ONE, AND INPUT RESPONSES INTO SUMMARY MEMORANDUM.
2/4/2025	7	450.00	8.50	\$	3,825.00	DEFEND PLAINTIFF'S DEPOSITION IN OAKLAND; RETURN TRAVEL FROM OAKLAND TO SANTA ANA.
2/4/2025	76	450.00	1.10	\$	495.00	STRATEGY AND ANALYSIS REGARDING ADDITIONAL EMPLOYEES OF RTI.
2/4/2025	76	450.00	0.50	\$	225.00	PREPARE FOR DEPOSITION E. MARES.
2/5/2025	11	450.00	1.00	\$	450.00	STRATEGIZE REGARDING LIABILITY ISSUES AND NEED FOR DAMAGES, INCLUDING NEXT STEPS AND REVIEW OF EXPERT.
2/5/2025	7	450.00	2.30	\$	1,035.00	DAMAGES ANALYSIS IN PREPARATION FOR MEDIATION.
2/5/2025	76	450.00	0.90	\$	405.00	REVIEW AND REVISE UPCOMING DEPOSITION SCHEDULE AND PREPARE FOR E. MARES DEPOSITION.
2/5/2025	76	450.00	0.60	\$	270.00	CONTINUE PREPARATION FOR E. MARES DEPOSITION.
2/6/2025	76	450.00	2.00	\$	900.00	CONTINUE PREPARATION FOR E. MARES DEPOSITION.
2/6/2025	76	450.00	0.40	\$	180.00	STRATEGY AND ANALYSIS REGARDING KEY DAMAGES CALCULATIONS AND DEPOSITIONS.
2/6/2025	45	200.00	0.50	\$	100.00	REVIEW CALIFORNIA EMPLOYEE AGREEMENTS FOR CONFIDENTIALITY AGREEMENTS VERSUS NON-SOLICITATION AGREEMENTS.

2/6/2025	7	450.00	2.1	\$	945.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING MEET AND CONFER ON DISCOVERY; STRATEGIZE WITH T. BECK REGARDING DISCOVERY AND DAMAGES ISSUES; FOLLOW UP REGARDING PREPARATION FOR MEDIATION.
2/7/2025	76	450.00	1.60	\$	720.00	FINAL PREPARATION FOR DEPOSITION OF E. MARES.
2/7/2025	76	450.00	4.00	\$	1,800.00	ATTEND E. MARES' DEPOSITION.
2/7/2025	76	450.00	0.60	\$	270.00	POST DEPOSITION STRATEGY.
2/7/2025	7	450.00	1.4	\$	630.00	STRATEGIZE REGARDING DISCOVERY AND MEET AND CONFER ISSUES; CORRESPOND WITH OPPOSING COUNSEL; STRATEGIZE REGARDING DAMAGE CALCULATIONS.
2/10/2025	76	450.00	0.10	\$	45.00	STRATEGY AND ANALYSIS REGARDING BEARD WITNESS DECLARATION.
2/10/2025	76	450.00	0.60	\$	270.00	PREPARE FOR DEPOSITIONS ON FEBRUARY 11.
2/10/2025	76	450.00	0.30	\$	135.00	PREPARE FOR MEET AND CONFER CALL.
2/10/2025	76	450.00	1.40	\$	630.00	MEET AND CONFER CALL REGARDING DISCOVERY RESPONSES AND POST CALL STRATEGY AND ANALYSIS.
2/10/2025	76	450.00	0.60	\$	270.00	PREPARE SPECIAL INTERROGATORIES, SET FOUR AND STRATEGY AND ANALYSIS FOR SPECIAL INTERROGATORIES, SET FOUR.
2/10/2025	7	450.00	3.50	\$	1,575.00	PARTICIPATE IN MEET AND CONFER TELEPHONE CONFERENCE REGARDING REFINED TECHNOLOGIES' DISCOVERY RESPONSES; REVIEW INTERROGATORIES TO REFINED TECHNOLOGIES; FOLLOW UP ON EXPERT ISSUES.
2/11/2025	7	450.00	1.20	\$	540.00	STRATEGIZE REGARDING DISCOVERY ISSUES; CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME.
2/11/2025	76	450.00	0.70	\$	315.00	PREPARE FOR DEPOSITION OF T. VAN NYGUEN.
2/11/2025	76	450.00	3.80	\$	1,710.00	DEPOSITION OF T. VAN NYGUEN.
2/11/2025	76	450.00	3.80	\$	1,710.00	DEPOSITION OF J. OULLETTE.
2/11/2025	76	450.00	0.40	\$	180.00	POST DEPOSITIONS STRATEGY AND ANALYSIS.
2/12/2025	7	450.00	4.10	\$	1,845.00	ANALYSIS REGARDING EXPERT DAMAGES CALCULATIONS; BEGIN MEDIATION BRIEF; STRATEGIZE WITH M. PILLSBURY REGARDING DAMAGES FOR NSA AND ARBITRATION AGREEMENT.
2/12/2025	76	450.00	0.30	\$	135.00	STRATEGY AND ANALYSIS REGARDING MEDIATION, INFORMAL DISCOVERY CONFERENCE, AND DEPOSITIONS.
2/12/2025	76	450.00	1.20	\$	540.00	REVIEW RECORDS OF J. BRIAN BEARD TO PREPARE DECLARATION.
2/12/2025	76	450.00	1.40	\$	630.00	STRATEGY AND ANALYSIS FOR HUMAN RESOURCES' DEPOSITIONS ON 2/18 & 2/19; AND DAMAGE CALCULATIONS.
2/12/2025	45	200.00	0.50	\$	100.00	REVIEW DISCOVERY RESPONSES TO SPECIAL INTERROGATORIES, SET TWO, AND SUPPLEMENTAL REQUESTS FOR PRODUCTION, SET ONE, AND UPDATE MEMORANDUM WITH OBJECTIONS AND ANSWERS.

2/12/2025	45	200.00	1.4	\$	280.00	REVIEW AGREEMENTS AND HANDBOOK ACKNOWLEDGEMENTS, CALCULATE PAY PERIODS BETWEEN ALL AGREEMENTS AND TERMINATION DATES AND DATE OF PAGA LETTER FOR CALIFORNIA EMPLOYEES.
2/13/2025	11	450	1	\$	450.00	STRATEGIZE REGARDING NEXT INDIVIDUAL CLIENTS AND CONTINGENCY CASE PLANS FOR SAME.
2/13/2025	7	450.00	5.70	\$	2,565.00	PREPARE FOR AND MEET WITH B. BEARD; FOLLOW UP REGARDING SAME; ANALYSIS OF WITNESS TESTIMONY AND NEEDS; STRATEGIZE REGARDING EXPERT WITNESS ISSUES; STRATEGIZE WITH T. BECK REGARDING EXPERT WITNESS ISSUES.
2/13/2025	76	450.00	2.60	\$	1,170.00	PREPARE DECLARATION FOR J. BRIAN BEARD, AND WITNESS INTERVIEW OF J. BRIAN BEARD.
2/13/2025	76	450.00	1.50	\$	675.00	PREPARE AND SEND UPDATE DAMAGE REQUESTS FOR EXPERT; AND PREPARE FOR DEPOSITIONS OF RTI HUMAN RESOURCES.
2/13/2025	76	450.00	1.70	\$	765.00	WITNESS INTERVIEW WITH J. BRIAN BEARD.
2/13/2025	76	450.00	1.30	\$	585.00	POST INTERVIEW DECLARATION DRAFTING.
2/14/2025	76	450.00	1.30	\$	585.00	CALL WITH EXPERT TO DISCUSS SPECIFIC DAMAGE CALCULATIONS AND INFORMATION NEEDED.
2/14/2025	76	450.00	1.50	\$	675.00	POST EXPERT CALL STRATEGY AND ANALYSIS AND REVIEW DEPOSITIONS DOCUMENTS FOR WEEK OF FEBRUARY 16.
2/14/2025	76	450.00	1.50	\$	675.00	CONTINUE PREPARING J. BRIAN BEARD DECLARATION.
2/14/2025	7	450	1	\$	450.00	TELEPHONE CONFERENCE WITH EXPERTS REGARDING CALCULATIONS; FOLLOW UP REGARDING EXPERT ISSUES AND DAMAGE CALCULATIONS.
2/14/2025	45	200.00	1	\$	200.00	REVIEW RTI'S RESPONSES TO SPECIAL INTERROGATORIES AND CREATE LIST OF EMPLOYEES TERMINATE, SEPARATED, OR RESIGNED, AND LIST OF EMPLOYEES WITH JOB TITLES OF INTEREST.
2/14/2025	45	200.00	0.2	\$	40.00	PREPARE PAY AND TIME DATA FOR CLASS MEMBER R. ROUH, FOR SERVICE TO EXPERT FOR ANALYSIS.
2/16/2025	45	200.00	0.90	\$	180.00	REVIEW PAGA PRODUCTIONS FOR FILES RELATED TO H. BROEDER AND L. NOYES, AND ANY HUMAN RESOUCUE FILES.
2/17/2025	76	450.00	0.80	\$	360.00	FINALIZE J. BRIAN BEARD DECLARATION.
2/17/2025	76	450.00	2.30	\$	1,035.00	PREPARE FOR DEPOSITIONS OF H. BROEDER AND L. NOYES.
2/17/2025	76	450.00	0.10	\$	45.00	REVIEW E. MOYA FILE TO RESOLVE QUESTION FOR EXPERT.
2/18/2025	12	450.00	0.20	\$	90.00	STRATEGIZE REGARDING VACATION FORFEITURE CLAIM.
2/18/2025	7	450	6.2	\$	2,790.00	PREPARE MEDIATION BRIEF; RESEARCH REGARDING LEGAL ISSUES ON PAGA LIABILITY; STRATEGIZE WITH T. BECK REGARDING DISCOVERY ISSUES.
2/18/2025	45	200.00	1.20	\$	240.00	REVIEW RESPONSES TO PLAINTIFF'S SUPPLEMENTAL DISCOVERY, SET ONE, AND SUMMARIZE RESPONSES IN MEMORANDUMS.

2/18/2025	45	200.00	0.50	\$	100.00	REVIEW DEFENDANT'S PAGA DOCUMENT PRODUCTIONS FOR ORGANIZATIONAL CHART.
2/18/2025	76	450.00	0.90	\$	405.00	PREPARE FOR H. BROEDER DEPOSITION.
2/18/2025	76	450.00	5.00	\$	2,250.00	DEPOSITION OF H. BROEDER.
2/18/2025	76	450.00	0.80	\$	360.00	POST DEPOSITION REVIEW.
2/18/2025	76	450.00	0.60	\$	270.00	STRATEGY AND ANALYSIS REGARDING UPCOMING DEPOSITIONS AND MEDIATION.
2/19/2025	45	200.00	2.50	\$	500.00	REVIEW AND SUMMARIZE RESPONSES TO PLAINTIFF'S SPECIAL INTERROGATORIES, REQUESTS FOR PRODUCTION, REQUESTS FOR ADMISSION, AND FORM INTERROGATORIES, SETS TWO, THREE AND FOUR.
2/19/2025	7	450.00	4.3	\$	1,935.00	TELEPHONE CONFERENCE WITH EXPERT REGARDING DAMAGE CALCULATION; ADDITIONAL PREPARATION OF MEDIATION BRIEF; STRATEGIZE WITH T. BECK REGARDING DISCOVERY ISSUES; AND DOCUMENT PRODUCTION BY REFINED TECHNOLOGY.
2/19/2025	76	450.00	1.30	\$	585.00	PREPARE FOR DEPOSITION OF L. NOYES.
2/19/2025	76	450.00	0.30	\$	135.00	FOLLOW-UP WITH EXPERT.
2/19/2025	76	450.00	8.20	\$	3,690.00	DEPOSITION OF L. NOYES.
2/19/2025	76	450.00	0.30	\$	135.00	STRATEGY AND ANALYSIS POST DEPOSITION.
2/20/2025	7	450.00	4.1	\$	1,845.00	PREPARE MEDIATION BRIEF; PREPARE DECLARATION OF B. BEARD; REVIEW DISCOVERY ISSUES AND POTENTIAL PLAN.
2/20/2025	76	450.00	1.90	\$	855.00	FINALIZE J. BEARD DECLARATION.
2/20/2025	76	450.00	0.80	\$	360.00	REVIEW FILE REGARDING J. SALAS.
2/20/2025	76	450.00	0.10	\$	45.00	ATTEMPT TO CONNECT WITH J. SALAS REGARDING A DECLARATION.
2/20/2025	76	450.00	0.20	\$	90.00	CORRESPOND WITH RTI'S COUNSEL REGARDING UPCOMING DEPOSITIONS.
2/20/2025	45	200.00	3.00	\$	600.00	REVIEW AND SUMMARIZE REMAINING DISCOVERY RESPONSES TO PLAINTIFF, AND ALL DISCOVERY RESPONSES BY.
2/21/2025	45	200.00	0.80	\$	160.00	REVIEW DISCOVERY RESPONSES FOR LIST OF TERMINATED EMPLOYEES AND COMPILE EMPLOYEES AND TERMINATION DATES FOR EXPERT.
2/21/2025	7	450.00	8.50	\$	3,825.00	REVISE B. BEARD DECLARATION; PREPARE MEDIATION BRIEF; MULTIPLE COMMUNICATIONS WITH EXPERT OVER DAMAGE CALCULATIONS; MULTIPLE COMMUNICATIONS REGARDING FACTS AND DEPOSITION.
2/21/2025	76	450.00	3.20	\$	1,440.00	FINALIZE J. BEARD DECLARATION.
2/21/2025	76	450.00	0.20	\$	90.00	CORRESPOND REGARDING INFORMAL DISCOVERY CONFERENCE.
2/21/2025	76	450.00	0.90	\$	405.00	STRATEGY AND ANALYSIS REGARDING EXPERT DAMAGE CALCULATIONS.
2/21/2025	11	450.00	0.80	\$	360.00	STRATEGIZE REGARDING DISCOVERY AND UPDATE WITH TEAM REGARDING DRAFT RESPONSES, COURT CONFERENCE, AND UPDATE REGARDING SAME.

2/23/2025	11	450.00	2.70	\$	1,215.00	REVIEW AND REVISE DRAFT MEDIATION BRIEF FOR MEDIATOR AND POTENTIAL REVIEW BY OTHERS; CORRESPOND WITH TEAM REGARDING SAME.
2/23/2025	45	200.00	0.60	\$	120.00	PREPARE DISPUTE POLICY AND J. BEARD DECLARATION FOR PRODUCTION, YOUNG 000992-YOUNG 001124, AND UPDATE U DRIVE FILE WITH ADDITIONAL PRODUCTIONS FROM DEFENDANT.
2/23/2025	7	450	3.5	\$	1,575.00	PREPARE DISCOVERY RESPONSES; EDIT OF MEDIATION BRIEF; STRATEGIZE REGARDING B. BEARD DECLARATION AND NEW PRODUCTION TO REFINED TECHNOLOGY.
2/23/2025	76	450.00	0.50	\$	225.00	STRATEGY AND ANALYSIS REGARDING DISCOVERY DUE 2/24.
2/24/2025	11	450.00	0.70	\$	315.00	STRATEGIZE REGARDING MEDIATION POINTS WITH THE TEAM AND ITEMS TO EMPHASIZE WITH THE MEDIATOR.
2/24/2025	11	450.00	1.50	\$	675.00	OUTLINE OF THOUGHTS AND PLANS FOR MEDIATION AND DISCUSS SAME WITH CLIENT AND STRATEGIZE REGARDING SAME IN PREPARATION FOR MEDIATION.
2/24/2025	7	450.00	3.6	\$	1,620.00	FINALIZE DISCOVERY RESPONSES; FINALIZE MEDIATION BRIEF; CORRESPOND WITH J. YOUNG REGARDING DISCOVERY RESPONSES AND MEDIATION; CORRESPOND WITH MEDIATOR REGARDING MEDIATION; FINALIZE DISCOVERY RESPONSES AND DOCUMENT PRODUCTION.
2/25/2025	11	450	1.4	\$	630.00	TELEPHONE CALL WITH J. YOUNG AND OTHERS REGARDING MEDIATION PLANS AND STRATEGIZE REGARDING WAYS TO ACHIEVE BEST RESOLUTION.
2/25/2025	76	450.00	0.20	\$	90.00	CORRESPOND WITH J. SALAS REGARDING HIS DEPOSITION AND POTENTIAL DECLARATION.
2/25/2025	76	450.00	0.40	\$	180.00	STRATEGY AND ANALYSIS TO POSTPONE THE DEPOSITION OF J. SALAS.
2/25/2025	76	450.00	0.90	\$	405.00	REVIEW AMENDED DISCOVERY.
2/25/2025	7	450.00	1.00	\$	450.00	PREPARE FOR AND PARTICIPATE IN TELEPHONE CONFERENCE WITH MEDIATOR REGARDING FACTS AND BACKGROUND IN PREPARATION FOR MEDIATION.
2/26/2025	11	450.00	1.40	\$	630.00	REVIEW INSTRUCTIONS AND CORRESPONDENCE REGARDING MEDIATION PREPARATION, ITEMS NOTED BY THE MEDIATOR, AND PLANS FOR SAME, INCLUDING PLAINTIFF VIEW POINTS AFTER DISCUSSION WITH J. YOUNG.
2/26/2025	76	450.00	2.10	\$	945.00	PREPARE FOR MEDIATION AND RESEARCH VARIOUS QUESTIONS FOR MEDIATOR.
2/26/2025	7	450.00	2.60	\$	1,170.00	PREPARE CORRESPONDENCE TO T. BECK REGARDING MEDIATION PREPARATION AND INFORMATION REQUESTED BY MEDIATOR; CORRESPOND WITH MEDIATOR REGARDING MEDIATION; PREPARE SHELL SETTLEMENT AGREEMENT FOR DISCUSSION AT MEDIATION; FOLLOW UP REGARDING SAME.

2/27/2025	11	450.00	2.50	\$	1,125.00	ADDITIONAL PREPARATION WORK FOR MEDIATION AND OUTLINE OF KEY CLAIMS AND INSTRUCTIONS TO ASSOCIATE REGARDING SAME, INCLUDING REVIEW OF DEPOSITION CITES, KEY TESTIMONY, AND KEY POINTS FOR LEVERAGE.
2/27/2025	76	450.00	7.20	\$	3,240.00	PREPARE FOR MEDIATION AND RESEARCH VARIOUS QUESTIONS FOR MEDIATOR.
2/27/2025	7	450.00	1.20	\$	540.00	REVIEW AND RESEARCH REGARDING QUESTIONS POSED BY MEDIATOR TO ANSWER PRIOR TO MEDIATION; PREPARE FOR MEDIATION.
2/28/2025	11	450.00	10.00	\$	4,500.00	PREPARE FOR AND ATTEND MEDIATION WITH MEDIATOR J. ARIAS YOUNG FOR MEDIATION REMOTELY AND UPDATE REGARDING SAME.
2/28/2025	76	450.00	1.00	\$	450.00	REVISE MEMORANDUM FOR MEDIATOR.
2/28/2025	76	450.00	0.90	\$	405.00	REVIEW ADDITIONAL TRANSCRIPT TESTIMONY TO PROVIDE TO THE MEDIATOR.
2/28/2025	11	450.00	1.00	\$	450.00	MULTIPLE COMMUNICATION WITH CLIENT J. YOUNG REGARDING MEDIATION, UPDATES REGARDING SAME, AND STRATEGIZE REGARDING NEXT STEPS IN PROPOSAL IS ACCEPTED.
2/28/2025	7	450.00	7.50	\$	3,375.00	PARTICIPATE IN MEDIATION WITH JULIE ARIAS YOUNG; FOLLOW UP REGARDING SAME.
3/3/2025	11	450.00	1.40	\$	630.00	STRATEGIZE REGARDING COURT CONFERENCE AND INSTRUCTIONS TO ASSOCIATE REGARDING SAME; CORRESPOND WITH MEDIATOR REGARDING ACCEPTANCE OF MEDIATOR'S PROPOSAL.
3/3/2025	11	450.00	0.40	\$	180.00	STRATEGIZE REGARDING WRAPPING UP SETTLEMENT AND POSSIBILITY OF PURSUING INDIVIDUAL CLAIM.
3/3/2025	7	450.00	3.5	\$	1,575.00	PREPARE SETTLEMENT AGREEMENT; CORRESPOND WITH MEDIATOR AND OPPOSING COUNSEL REGARDING SETTLEMENT; PREPARE NOTICE OF SETTLEMENT TO COURT; RESEARCH APPROVAL PROCESS FOR J. CLASTER.
3/3/2025	76	450.00	4.5	\$	2,025.00	RESEARCH MOTION FOR PAGA SETTLEMENT APPROVAL FOR JUDGE CLASTER IN ORANGE COUNTY SUPERIOR COURT; AND PREPARE MOTION.
3/3/2025	76	450.00	0.3	\$	135.00	PREPARE NOTICE OF SETTLEMENT.
3/4/2025	76	450.00	6.50	\$	2,925.00	PREPARE MOTION TO APPROVE PAGA SETTLEMENT.
3/4/2025	7	450.00	3.5	\$	1,575.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING SETTLEMENT; REVISE SETTLEMENT AGREEMENT; STRATEGIZE WITH T. BECK REGARDING COSTS AND MOTION FOR APPROVAL; FOLLOW UP REGARDING SAME.
3/5/2025	7	450.00	0.60	\$	270.00	ANALYSIS REGARDING COSTS/EXPENSES AND FINALIZING AMOUNT.
3/5/2025	76	450.00	0.60	\$	270.00	REVISE MOTION TO APPROVE SETTLEMENT DECLARATION.
3/6/2025	7	450.00	2.10	\$	945.00	REVIEW COURT ORDER REGARDING SETTLEMENT AND VACATING HEARING DATES PENDING MOTION FOR APPROVAL; STRATEGIZE REGARDING SETTLEMENT CALCULATIONS AND MOTION FOR APPROVAL.

3/7/2025	7	450.00	3.50	\$	1,575.00	ADDITIONAL REVISIONS OF SETTLEMENT AGREEMENT; REVISE MOTION FOR APPROVAL OF PAGA CASE; STRATEGIZE WITH T. BECK REGARDING SAME.
3/7/2025	76	450.00	2.6	\$	1,170.00	REVIEW SETTLEMENT AGREEMENT; AND REVIEW MOTION TO APPROVE PAGA SETTLEMENT.
3/9/2025	76	450.00	5.50	\$	2,475.00	REVIEW LEGAL AUTHORITY FOR MOTION TO APPROVE PAGA SETTLEMENT; REVISE MOTION AND ASSOCIATED DOCUMENTS, INCLUDING DECLARATION AND PROPOSED ORDER.
3/10/2025	7	450.00	0.70	\$	315.00	FINALIZE SETTLEMENT AGREEMENT; CORRESPOND WITH OPPOSING COUNSEL REGARDING SAME.
3/10/2025	76	450.00	0.20	\$	90.00	REVISE DECLARATION FOR PAGA APPROVAL MOTION.
3/10/2025	76	450.00	0.20	\$	90.00	STRATEGY AND ANALYSIS REGARDING EXECUTION OF SETTLEMENT.
3/11/2025	7	450.00	2.90	\$	1,305.00	STRATEGIZE AND REVISE MOTION FOR APPROVAL; CORRESPOND WITH J. YOUNG REGARDING SIGNED SETTLEMENT AGREEMENT.
3/11/2025	76	450.00	3.20	\$	1,440.00	REVISE MOTION TO APPROVE PAGA SETTLEMENT.
3/12/2025	7	450.00	1.60	\$	720.00	REVIEW AND STRATEGIZE MOTION FOR APPROVAL OF PAGA SETTLEMENT.
3/12/2025	76	450.00	4.10	\$	1,845.00	FURTHER REVISIONS TO PAGA APPROVAL MOTION.
3/13/2025	76	450.00	1.8	\$	810.00	REVIEW OPPOSING COUNSEL EDITS TO MOTION TO APPROVE PAGA SETTLEMENT AND FINALIZE ALL DOCUMENTS FOR FILING.
3/13/2025	11	450.00	0.80	\$	360.00	REVIEW REDLINES PROPOSED BY THE PLAINTIFFS' COUNSEL TO THE PAGA APPROVAL MOTION AND PLANS FOR SAME; TELEPHONE CALL WITH CLIENT REGARDING RESOLUTION REACHED.
3/14/2025	76	450.00	1.3	\$	585.00	FINALIZE MOTION TO APPROVE PAGA SETTLEMENT FOR FILING.
4/17/2025	7	450.00	0.80	\$	360.00	PREPARE FOR HEARING ON MOTION FOR PRELIMINARY APPROVAL; REVIEW TENTATIVE RULING.
4/21/2025	11	450.00	1.30	\$	585.00	REVIEW COURT MINUTE ORDER AND UPDATES REGARDING SAME.
4/22/2025	7	450.00	2.1	\$	945.00	REVIEW MINUTE ORDER REGARDING SETTLEMENT AND COURT REQUIREMENTS FOR FURTHER CONSIDERATION OF PRELIMINARY APPROVAL; RESEARCH REGARDING SAME; REVIEW FACTUAL ISSUES FOR SUPPLEMENTAL FILING.
4/25/2025	7	450.00	2.2	\$	990.00	REVIEW REGARDING FURTHER DOCUMENTATION TO GET SETTLEMENT APPROVED AS IDENTIFIED IN COURT ORDER CONTINUING MOTION FOR PRELIMINARY APPROVAL.
4/30/2025	7	450.00	0.6	\$	270.00	CORRESPOND WITH OPPOSING COUNSEL REGARDING SUPPLEMENTAL BRIEFING ON MOTION FOR PRELIMINARY APPROVAL; FOLLOW UP REGARDING SAME.
4/30/2025	11	450.00	0.70	\$	315.00	REVIEW ADDITIONAL CORRESPONDENCE REGARDING WRAPPING UP PAGA SETTLEMENT AND DATA NEEDED BY THE COURT.

4/30/2025	7	450	0.6	\$	270.00	PREPARE FOR DEPOSITION OF B. BLACK; CORRESPOND WITH B. BLACK REGARDING SAME.
5/12/2025	7	450.00	2.5	\$	1,125.00	PREPARE SUPPLEMENTAL MATERIALS IN RESPONSE TO COURT'S QUESTIONS REGARDING MOTION TO APPROVE PAGA SETTLEMENT.
5/13/2025	7	450.00	4.2	\$	1,890.00	PREPARE SUPPLEMENTAL DECLARATION AND MATERIALS TO RESPOND TO COURT QUESTIONS ON MOTION FOR APPROVAL OF SETTLEMENT; CORRESPOND WITH OPPOSING COUNSEL REGARDING SUPPLEMENTAL FILING; CORRESPOND WITH EXPERT REGARDING SUPPLEMENTAL FILING.
5/14/2025	7	450	3.5	\$	1,575.00	PREPARE FOR AND TELEPHONE CALL WITH OPPOSING COUNSEL REGARDING SUPPLEMENTAL MATERIALS ORDERED BY COURT FOR MOTION FOR APPROVAL; FOLLOW UP REGARDING SAME; ADDITIONAL PREPARATION OF SUPPLEMENTAL BRIEFING.
5/15/2025	7	450	3.6	\$	1,620.00	FURTHER RESEARCH AND PREPARE SUPPLEMENTAL BRIEFING FOR MOTION FOR APPROVAL.
5/16/2025	7	450	4.2	\$	1,890.00	ADDITIONAL PREPARATION OF SUPPLEMENTAL FILING REGARDING MOTION FOR PRELIMINARY APPROVAL.
5/20/2025	7	450	3.1	\$	1,395.00	CORRESPOND WITH J. SWICK REGARDING SUPPLEMENTAL MATERIALS FOR COURT; PREPARE SUPPLEMENTAL BRIEF AND DECLARATION; STRATEGIZE REGARDING SPREADSHEETS AND OTHER EXHIBITS.
5/21/2025	7	450	3.1	\$	1,395.00	STRATEGIZE REGARDING TAKING STATUS CONFERENCE OFF CALENDAR; MULTIPLE COMMUNICATIONS WITH J. SWICK REGARDING SUPPLEMENTAL BRIEFING TO COURT.
5/22/2025	7	450	1.4	\$	630.00	REVISE DECLARATION OF L. NOYS IN SUPPORT OF MOTION FOR APPROVAL; FOLLOW UP ON SUPPLEMENTAL BRIEFING; ADDITIONAL PREPARATION OF SUPPLEMENTAL SCHEITHAUER DECLARATION.

GRAND TOTALS

\$ 482,840.00

Name	Level	Tkpr	Rate	Hours
Chris Scheithauer	Shareholder	7	450	350.1
John Egley	Shareholder	11	450	154.9
Ellen Choen	Shareholder	12	450	1.6
Samuel Brooks	Shareholder	19	450	55.7
Eric Lystrup	Associate	43	450	10.5
Travis Beck	Associate	76	450	417.2
Natalie Evenson	Paralegal	77	200	1.4
Maurice Pillsbury	Paralegal	45	200	185.3
		TOTAL		1176.7

EXHIBIT D

Trans date	Tkpr	Tcode / Task Code	Rate	Amount	Description
7/31/2022	11	920		\$ 167.97	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 846778305, 7/15/2022
8/1/2022	11	903		\$ 75.00	FILING FEE (CC), STATE OF CALIFORNIA DEPARTMENT OF INDUSTRIAL RELATIONS
8/31/2022	11	920		\$ 26.97	ONLINE LEGAL RESEARCH, THOMSON WEST, 846954778, 08/31/22
9/9/2022	11	903		\$ 1,435.00	FILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 13982081, 09/09/22
9/9/2022	11	905		\$ 14.75	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 13982081, 09/09/22
9/14/2022	11	917		\$ 89.65	COURIER SERVICES, REFINED TECHNOLOGIES INC, FIRST LEGAL, INVOICE 30210522, 09/14/22
9/19/2022	11	905		\$ 14.75	EFILING FEE, ORANGE COUNTY SUPERIOR COURT. ONE LEGAL, INVOICE 14001274, 09/19/22
9/30/2022	11	920		\$ 274.01	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 847116192, 09/28/22
10/21/2022	11	920		\$ 337.60	ONLINE LEGAL RESEARCH ,THOMSON WEST, INVOICE 847271743, 10/21/2022
10/24/2022	11	905		\$ 18.75	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 14084644, 10/24/22
10/24/2022	11	917		\$ 41.75	COURIER SERVICES, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 14087407, 10/24/22
11/7/2022	11	905		\$ 19.75	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 14117603, 11/17/22
11/14/2022	11	920		\$ 386.66	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 847440841, 11/14/2022
12/13/2022	11	920		\$ 77.89	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 847605378, 12/13/2022
1/5/2023	11	920		\$ 268.49	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 847771487, 1/5/2023
1/6/2023	11	905		\$ 18.75	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 14245800, 01/06/23
1/9/2023	11	917		\$ 43.50	COURIER SERVICES, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 14250267, 01/09/23
2/7/2023	11	920		\$ 181.13	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 847924646, 2/7/2023

4/1/2023	11 920		\$	424.95	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 848082673, DATE OF SERVICE 03/28/23
5/1/2023	11 920		\$	432.05	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 848243638, DATE OF SERVICE 04/06/23
7/31/2023	11 920		\$	676.87	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 848725457, DATE OF SERVICE 07/27/23
8/14/2023	11 903		\$	40.20	FILING & EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 14792562, DATE OF SERVICE 08/14/23
8/30/2023	11 905		\$	19.20	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 14840121, DATE OF SERVICE 08/30/23
09/01/2023	11 920		\$	14.53	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 848886158, DATE OF SERVICE 08/30/23
9/13/2023	11 917		\$	50.00	COURIER SERVICES, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 14873225, DATE OF SERVICES 09/13/23
9/14/2023	11 905		\$	19.20	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 14880555, DATE OF SERVICE 09/14/23
10/1/2023	11 920		\$	259.62	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 849040692, DATE OF SERVICES 09/21/23
11/3/2023	11 903		\$	41.20	FILING & EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 15018150, DATE OF SERVICE 11/03/23
12/27/2023	11 950	0.600	\$	7.50	ELECTRONIC ACCESS TO COURT RECORDS, ORANGE COUNTY SUPERIOR COURT, DATE OF SERVICE 12/27/23
1/10/2024	11 950	0.600	\$	7.50	ELECTRONIC ACCESS TO COURT RECORDS, ORANGE COUNTY SUPERIOR COURT, DATE OF SERVICE 01/10/24
01/23/2024	11 905		\$	17.20	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 15228131, DATE OF SERVICE 1/23/24
02/01/2024	11 950	0.600	\$	7.50	ELECTRONIC ACCESS TO COURT RECORDS, ORANGE COUNTY SUPERIOR COURT, DATE OF SERVICE 02/01/24
2/26/2024	11 905		\$	17.20	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 15328887, DATE OF SERVICE 02/26/24
3/14/2024	11 905		\$	17.20	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 15390568, DATE OF SERVICE 03/14/24
5/8/2024	11 905		\$	22.20	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 15577338, DATE OF SERVICE 05/08/24
5/16/2024	11 950	0.600	\$	7.50	ELECTRONIC ACCESS TO COURT RECORDS, ORANGE COUNTY SUPERIOR COURT, DATE OF SERVICE 05/16/24
5/16/2024	11 905		\$	22.20	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 15605352, DATE OF SERVICE 05/16/24

08/01/2024	11 920		\$	146.27	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 850578448, DATE OF SERVICE 07/01/24 - 07/31/24
9/3/2024	11 905		\$	23.20	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 15906863, DATE OF SERVICE 09/03/24
9/10/2024	11 950	0.600	\$	7.50	ELECTRONIC ACCESS TO COURT RECORDS, ORANGE COUNTY SUPERIOR COURT, DATE OF SERVICE 09/10/24
11/15/2024	11 902		\$	181.10	PARCEL SERVICE, MCDOWELL HETHERINGTON LLP, FEDEX, INVOICE 8-683-37835, DATE OF SERVICE 11/07/24
11/22/2024	11 950	0.600	\$	7.50	ELECTRONIC ACCESS TO COURT RECORDS, ORANGE COUNTY SUPERIOR COURT, DATE OF SERVICE 11/22/24
12/1/2024	11 920		\$	616.53	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 851137364, DATE OF SERVICE 11/01/24 - 11/30/24
12/18/2024	11 925		\$	211.50	SERVICE OF PROCESS, E. MARES, TITAN LEGAL SERVICES, INVOICE SU419053-02-01, DATE OF SERVICE 12/18/24
12/18/2024	11 925		\$	186.50	SERVICE OF PROCESS, J. OUELLETTE, TITAN LEGAL SERVICE, INVOICE SU419055-01-01, DATE OF SERVICE 12/18/24
12/18/2024	11 925		\$	211.50	SERVICE OF PROCESS, J. SALAS, TITAN LEGAL SERVICE, INVOICE SU419056-01-01, DATE OF SERVICE 12/18/24
12/18/2024	11 925		\$	186.50	SERVICE OF PROCESS, J. MARTINEZ, TITAN LEGAL SERVICE, INVOICE SU419058-01-01, DATE OF SERVICE 12/18/24
12/18/2024	11 925		\$	186.50	SERVICE OF PROCESS, M. BARNHART, TITAN LEGAL SERVICE, INVOICE SU419059-01-01, DATE OF SERVICE 12/18/24
12/18/2024	11 925		\$	186.50	SERVICE OF PROCESS, B. FRENCH, TITAN LEGAL SERVICE, INVOICE SU419059-02-01, DATE OF SERVICE 12/18/24
12/18/2024	11 925		\$	186.50	SERVICE OF PROCESS, J. ALCARAZ, TITAN LEGAL SERVICE, INVOICE SU419063-01-01, DATE OF SERVICE 12/18/24
12/18/2024	11 925		\$	201.50	SERVICE OF PROCESS, J. BEARD, TITAN LEGAL SERVICE, INVOICE SU419065-01-01, DATE OF SERVICE 12/18/24
12/30/2024	11 922		\$	3,472.85	TRANSCRIPT, DEPOSITION OF R. MILLER, VERITEXT LEGAL SOLUTIONS, INVOICE 7973646, DATE OF SERVICE 12/18/24
12/31/2024	11 922		\$	3,159.00	TRANSCRIPT, DEPOSITION OF T. SCHUENENMANN, VERITEXT LEGAL SOLUTIONS, INVOICE 7977077, DATE OF SERVICE 12/12/24
12/31/2024	11 925		\$	346.50	SERVICE OF PROCESS, D. RICCOBONO, TITAN LEGAL SERVICES, INVOICE SU419062-02-01, DATE OF SERVICE 12/31/24
1/1/2025	11 920		\$	93.91	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 851287874, DATE OF SERVICE 12/01/24 - 12/31/24
1/10/2025	11 943		\$	1,712.50	VIDEO TAPING, DEPOSITION OF T. SCHUENENMANN, VERITEXT LEGAL SOLUTIONS, INVOICE 8001712, DATE OF SERVICE 12/12/24

1/10/2025	11	953		\$	286.50	SUBPOENA AND SERVICE OF PROCESS FEES, C. HAAKER, TITAN LEGAL SERVICES, INVOICE SU419055-02-01, DATE OF SERVICE 01/10/25
1/10/2025	11	953		\$	306.50	SUBPOENA AND SERVICE OF PROCESS FEES, T. NGUYEN, TITAN LEGAL SERVICES, INVOICE SU419062-01-01, DATE OF SERVICE 01/10/25
1/10/2025	11	922		\$	712.99	TRANSCRIPT, DEPOSITION OF R. MILLER VOL II, VERITEXT LEGAL SOLUTIONS, INVOICE 7986567, DATE OF SERVICE 12/18/24
1/16/2025	11	905		\$	26.20	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 16231243, DATE OF SERVICE 01/16/25
1/16/2025	11	943		\$	1,897.50	VIDEO TAPING, DEPOSITION OF R. MILLER PART 1 AND 2, VERITEXT LEGAL SOLUTIONS, INVOICE 8010579, DATE OF SERVICE 12/18/24
01/17/2025	11	953		\$	148.00	SUBPOENA FEES, SUBPOENA FEES, D. GUZMAN, TITAN LEGAL SERVICES, INVOICE SU419058-02-01, DATE OF SERVICE 01/17/25
1/23/2025	11	956		\$	5,500.00	MEDIATION FEE, JODY ARIAS YOUNG MEDIATION, DATE OF SERVICE 01/23/25
01/23/2025	11	922		\$	655.00	CERTIFICATE OF NON-APPEARANCE, J. BEARD, VERITEXT LEGAL SOLUTIONS, INVOICE 8027914, DATE OF SERVICE 01/22/25
01/24/2025	11	953		\$	306.30	SUBPOENA AND SERVICE OF PROCESS FEES, C. HAAKER, TITAN LEGAL SERVICES, INVOICE SU420245-01-01, DATE OF SERVICE 01/24/25
01/26/2025	11	909		\$	525.96	AIR FARE, SOUTHWEST, INVOICE 2KQCEG, DATE OF SERVICE 02/04/25
01/27/2025	11	950	0.6	\$	7.50	ELECTRONIC ACCESS TO COURT RECORDS, ORANGE COUNTY SUPERIOR COURT, DATE OF SERVICE 01/27/25
02/03/2025	11	912		\$	76.17	UBER, DATE OF SERVICE 02/03/25 - 02/04/25
02/03/2025	11	911		\$	212.52	HOTEL, HAMPTON INN, INVOICE 92019437, DATE OF SERVICE 02/03/25 - 02/04/25
02/04/2025	11	922		\$	2,728.15	TRANSCRIPT, DEPOSITION OF L. HOPKINS, VERITEXT LEGAL SOLUTIONS, INVOICE 8056009, DATE OF SERVICE 01/27/25
02/06/2025	11	922		\$	2,094.85	TRANSCRIPT, DEPOSITION OF J. ALCARAZ, VERITEXT LEGAL SOLUTIONS, INVOICE 8063225, DATE OF SERVICE 01/22/25
02/13/2025	11	943		\$	1,897.50	VIDEO TAPING, DEPOSITION OF J. ALCARAZ, VERITEXT LEGAL SOLUTIONS, INVOICE 8072101, DATE OF SERVICE 01/22/25
02/14/2025	11	943		\$	1,497.50	VIDEO TAPING, DEPOSITION OF L. HOPKINS, VERITEXT LEGAL SOLUTIONS, INVOICE 8083436, DATE OF SERVICE 01/27/25

2/18/2025	11 922	\$	1,055.05	TRANSCRIPT, DEPOSITION OF J. YOUNG, VERITEXT LEGAL SOLUTIONS, INVOICE 8065622, DATE OF SERVICE 02/04/25
02/19/2025	11 922	\$	2,233.15	TRANSCRIPT, DEPOSITION OF T. WHITNEY, VERITEXT LEGAL SOLUTIONS, INVOICE 8085623, DATE OF SERVICE 01/31/25
02/19/2025	11 922	\$	2,760.85	TRANSCRIPT, DEPOSITION OF E. MARES, VERITEXT LEGAL SOLUTIONS, INVOICE 8092627, DATE OF SERVICE 02/07/25
02/20/2025	11 943	\$	1,112.50	VIDEO TAPING, DEPOSITION OF T. WHITNEY, VERITEXT LEGAL SOLUTIONS, INVOICE 8095801, DATE OF SERVICE 01/31/25
02/26/2025	11 922	\$	2,574.70	TRANSCRIPT, DEPOSITION OF J. OUELLETTE, VERITEXT LEGAL SOLUTIONS, INVOICE 8114156, DATE OF SERVICE 02/11/25
02/26/2025	11 922	\$	2,840.35	TRANSCRIPT, DEPOSITION OF T. NGUYEN, VERITEXT LEGAL SOLUTIONS, INVOICE 8114160, DATE OF SERVICE 02/11/25
02/27/2025	11 943	\$	1,127.50	VIDEO TAPING, DEPOSITION OF E. MARES, VERITEXT LEGAL SOLUTIONS, INVOICE 8116164, DATE OF SERVICE 02/07/25
02/28/2025	11 922	\$	2,456.95	TRANSCRIPT, DEPOSITION OF H. BROEDER, VERITEXT LEGAL SOLUTIONS, INVOICE 8122123, DATE OF SERVICE 02/18/25
2/28/2025	11 902	\$	20.43	PARCEL SERVICE, C. HAAKER, FEDEX, INVOICE 8-783-99200, DATE OF SERVICE 02/21/25
2/28/2025	11 953	\$	323.00	SUBPOENA AND SERVICE OF PROCESS FEES (X2 ATTEMPTS), J. KOPF, TITAN LEGAL SERVICES, INVOICE SU419053-01-01, DATE OF SERVICE 02/28/25
2/28/2025	11 953	\$	148.00	SUBPOENA AND SERVICE OF PROCESS FEES (X3 ATTEMPTS), T. WHITNEY, TITAN LEGAL SERVICES, INVOICE SU419067-01-01, DATE OF SERVICE 02/28/25
3/1/2025	11 920	\$	48.82	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 851577465, DATE OF SERVICE 02/01/25 - 02/28/25
03/04/2025	11 943	\$	2,047.50	VIDEO TAPING, DEPOSITION OF L. NOYES, VERITEXT LEGAL SOLUTIONS, INVOICE 8126311, DATE OF SERVICE 02/19/25
03/04/2025	11 943	\$	1,112.50	VIDEO TAPING, DEPOSITION OF J. OUELLETTE, VERITEXT LEGAL SOLUTIONS, INVOICE 8129242, DATE OF SERVICE 02/11/25
03/04/2025	11 943	\$	1,250.50	VIDEO TAPING, DEPOSITION OF T. NGUYEN, VERITEXT LEGAL SOLUTIONS, INVOICE 8129677, DATE OF SERVICE 02/11/25
03/04/2025	11 943	\$	1,447.50	VIDEO TAPING, DEPOSITION OF H. BROEDER, VERITEXT LEGAL SOLUTIONS, INVOICE 8129542, DATE OF SERVICE 02/18/25
03/04/2025	11 922	\$	2,654.10	TRANSCRIPT, DEPOSITION OF L. NOYES, VERITEXT LEGAL SOLUTIONS, INVOICE 8126533, DATE OF SERVICE 02/19/25
03/04/2025	11 905	\$	19.20	EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 16345006, DATE OF SERVICE 03/04/25

03/12/2025		\$	25,638.72	EXPERT WITNESS FEE, DLSE CONSULTING
03/17/2025	11 903	\$	80.20	FILING AND EFILING FEE, ORANGE COUNTY SUPERIOR COURT, ONE LEGAL, INVOICE 16380987, DATE OF SERVICE 03/17/25
04/01/2025	11 920	\$	17.81	ONLINE LEGAL RESEARCH, THOMSON WEST, INVOICE 851722630, DATE OF SERVICE 03/01/25 - 03/31/25

Total	\$	86,768.52
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EXHIBIT E

To: «FirstName» «LastName»
«Address1» «Address2»
«City» «State» «Zip»

Enclosed please find a check in the amount of **[INDIVIDUAL SETTLEMENT SHARE]**.

You are receiving this check because of a lawsuit brought by JEFFREY YOUNG ("Plaintiff") on behalf of all aggrieved employees against Defendant REFINED TECHNOLOGIES, INC. ("Defendant") for civil penalties pursuant to the Private Attorneys General Act, California Labor Code § 2698 et seq. ("PAGA"). The claim was filed in the Orange County Superior Court under Case No. 30-2022-01279468-CU-OE-CXC (the "Action").

Plaintiff's claim against Defendant is for civil penalties pursuant to the PAGA, a law that allows Plaintiff to attempt to stand in the shoes of the government and to seek penalties on the government's behalf and on behalf of those employees who Plaintiff claims were "aggrieved" by Defendant's alleged unlawful conduct. Specifically, Plaintiff alleges that Defendant failed to comply with wage-and-hour laws (including provisions of the California Labor Code) as to certain identified persons (including you) employed by Defendant who performed some work on behalf of Defendant in California between August 1, 2021 to February 28, 2025.

Defendant strongly denies these claims and maintains that it fully complied with all applicable wage-and-hour laws. Nevertheless, to avoid further costs and uncertainty from further litigation, Defendant agreed to settle the matter. The settlement covers Defendant and all persons, agents, servants, representatives, officers, directors, stockholders, employees, associations, joint ventures, corporations, parent corporations, subsidiaries, affiliates, partners, members, predecessors and successors in interest, insurers, re-insurers, and assigns, and all other legal entities with whom Defendant has been, is now, or may hereafter be affiliated with (all of whom are referred to here as the "Released Parties"). The Court has approved the settlement and release of claims described below. By settling this claim, Defendant and the Released Parties are not admitting they have done anything wrong, and they deny that they owe any penalties to the government or to you.

On **[insert date]**, 2025, the settlement was approved by the Court. A portion of the settlement is being paid to the government and a portion is being paid to certain identified persons employed by Defendant who performed some work on behalf of Defendant in California between August 1, 2021 to February 28, 2025 (the "Aggrieved Employees"). You are receiving a portion of the settlement because, based on Plaintiff's claims in the Action, Defendant's records indicate that you performed some work for Defendant in California between August 1, 2021 and February 28, 2025.

You will not be retaliated against for cashing the check. It is entirely up to you if you cash your check or not. Checks that are not cashed within 180 days of issuance shall be sent to the California Department of Unclaimed Property. Regardless of what you do with the check issued to you, by law and Court order, you have released the Released Parties from the released claims described below.

One hundred percent (100%) of your payment under this settlement will be considered penalties and will be reported to the IRS and state tax authorities as non-wage income.

This settlement bars you and other Aggrieved Employees, on behalf of yourself and your respective former and present representatives, agents, attorneys, heirs, administrators, successors, and assigns, from suing the Released Parties for all claims for PAGA penalties based on the facts that were alleged, or reasonably could have been alleged, based on the facts stated in the operative complaint in the Action and the PAGA Notices to the California Labor and Workforce Development Agency, for the period spanning August 1, 2021, through February 28, 2025.

Do not call or write the Court or Office of the Clerk to ask questions about the settlement.

If you have any questions, you may call or write **[insert], at the following phone number or address: **[insert address and telephone number for Administrator's contact person]****

EXHIBIT F

To: «FirstName» «LastName»
«Address1» «Address2»
«City» «State» «Zip»

Enclosed please find a check in the amount of **[INDIVIDUAL SETTLEMENT SHARE]**.

You are receiving this check because of a lawsuit brought by JEFFREY YOUNG ("Plaintiff") on behalf of all aggrieved employees against Defendant REFINED TECHNOLOGIES, INC. ("Defendant") for civil penalties pursuant to the Private Attorneys General Act, California Labor Code § 2698 et seq. ("PAGA"). The claim was filed in the Orange County Superior Court under Case No. 30-2022-01279468-CU-OE-CXC (the "Action").

Plaintiff's claim against Defendant is for civil penalties pursuant to the PAGA, a law that allows Plaintiff to attempt to stand in the shoes of the government and to seek penalties on the government's behalf and on behalf of those employees who Plaintiff claims were "aggrieved" by Defendant's alleged unlawful conduct. Specifically, Plaintiff alleges that Defendant failed to comply with wage-and-hour laws (including provisions of the California Labor Code) as to certain identified persons (including you) employed by Defendant who performed some work on behalf of Defendant in California between August 1, 2021 to February 28, 2025.~~non-exempt employees who worked for Defendant.~~

Defendant strongly denies these claims and maintains that it fully complied with all applicable wage-and-hour laws. Nevertheless, to avoid further costs and uncertainty from further litigation, Defendant agreed to settle the matter. The settlement covers Defendant and all persons, agents, servants, representatives, officers, directors, stockholders, employees, associations, joint ventures, corporations, parent corporations, subsidiaries, affiliates, partners, members, predecessors and successors in interest, insurers, re-insurers, and assigns, and all other legal entities with whom Defendant has been, is now, or may hereafter be affiliated with (all of whom are referred to here as the "Released Parties"). The Court has approved the settlement and release of claims described below. By settling this claim, Defendant and the Released Parties are not admitting they have done anything wrong, and they deny that they owe any penalties to the government or to you.

On **[insert date]**, 2025, the settlement was approved by the Court. A portion of the settlement is being paid to the government and a portion is being paid to certain identified persons employed by Defendant who performed some work on behalf of Defendant in California between August 1, 2021 to February 28, 2025~~each non-exempt employee who worked for Defendant in California from August 1, 2021, to February 28, 2025~~ (the "Aggrieved Employees"). You are receiving a portion of the settlement because, based on Plaintiff's claims in the Action, Defendant's records indicate that you performed some work for~~worked for~~ Defendant in California between~~from~~ August 1, 2021, and through February 28, 2025.

You will not be retaliated against for cashing the check. It is entirely up to you if you cash your check or not. Checks that are not cashed within 180 days of issuance shall be sent to the California Department of Unclaimed Property. Regardless of what you do with the check issued to you, by law and Court order, you have released the Released Parties from the released claims described below.

One hundred percent (100%) of your payment under this settlement will be considered penalties and will be reported to the IRS and state tax authorities as non-wage income.

This settlement bars you and other Aggrieved Employees, on behalf of yourself and your respective former and present representatives, agents, attorneys, heirs, administrators, successors, and assigns, from suing the Released Parties for all claims for PAGA penalties based on the facts that were alleged, or reasonably could have been alleged, based on the facts stated in the operative complaint in the Action and the PAGA Notices to the California Labor and Workforce Development Agency, for~~for~~ the period spanning August 1, 2021, through February 28, 2025, from pursuing any and all claims relating to any and all facts and claims asserted in the Action or that could have been asserted in the Action, as alleged in the notice(s) to the LWDA and any judicial Complaint(s) filed in connection with the litigation, including, but not limited to, any and all claims for civil penalties under PAGA based on alleged claims for unpaid minimum wages, wages, and overtime wages; failure to provide rest periods or meal periods or to provide compensation in lieu thereof; meal period penalties; rest period penalties; waiting time penalties; penalties for unpaid minimum wages, wages, or overtime wages; penalties for incomplete payroll

~~records and wage statements; failure to reimburse for business expenses; unfair business practices; conversion; failure to provide accurate wage statements; failure to maintain required records, and any related claims for attorneys' fees, costs, or interest resulting therefrom.~~

Do not call or write the Court or Office of the Clerk to ask questions about the settlement.

If you have any questions, you may call or write [insert], at the following phone number or address: [insert address and telephone number for Administrator's contact person]

1
2
3 **PROOF OF SERVICE**

4 STATE OF CALIFORNIA, COUNTY OF ORANGE

5 I am employed in the County of Orange, State of California. I am over the age of 18 and not a
6 party to the within action; my business address is 610 Newport Center Drive, Suite 700, Newport
Beach, CA 92660.

7 On May 29, 2025, I served the foregoing document described as **DECLARATION OF**
8 **CHRIS C. SCHEITHAUER IN SUPPORT OF PLAINTIFF'S MOTION TO APPROVE PAGA**
SETTLEMENT on the following person(s) in the manner indicated:

9 **SEE ATTACHED SERVICE LIST**

10 ☒ (BY ELECTRONIC SERVICE) I am causing the document(s) to be served on the Filing
11 User(s) through the Court's Electronic Filing System.

12 ☐ (BY MAIL) I am familiar with the practice of Call & Jensen for collection and processing of
13 correspondence for mailing with the United States Postal Service. Correspondence so collected and
14 processed is deposited with the United States Postal Service that same day in the ordinary course of
15 business. On this date, a copy of said document was placed in a sealed envelope, with postage fully
prepaid, addressed as set forth herein, and such envelope was placed for collection and mailing at Call
& Jensen, Newport Beach, California, following ordinary business practices.

16 ☐ (BY FEDEX) I am familiar with the practice of Call & Jensen for collection and processing of
17 correspondence for delivery by overnight courier. Correspondence so collected and processed is
18 deposited in a box or other facility regularly maintained by FedEx that same day in the ordinary course
19 of business. On this date, a copy of said document was placed in a sealed envelope designated by
20 FedEx with delivery fees paid or provided for, addressed as set forth herein, and such envelope was
placed for delivery by FedEx at Call & Jensen, Newport Beach, California, following ordinary
business practices.

21 ☐ (BY ELECTRONIC TRANSMISSION) I served electronically from the electronic notification
22 address of jsandoval@calljensen.com the document described above and a copy of this declaration to
23 the person and at the electronic notification address set forth herein. The electronic transmission was
reported as complete and without error.

24 I declare under penalty of perjury under the laws of the State of California that the foregoing is
25 true and correct, and that this declaration was executed on May 29, 2025.

26 
27 Julie Sandoval
28

SERVICE LIST

Andrew J. Brien
David T. McDowell
William X. King
McDowell Hetherington LLP
1001 Fannin Street, Suite 2700
Houston, TX 77002
Tel.: 713-337-5580
Andrew.brien@mhllp.com
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Attorneys for Defendant
REFINED TECHNOLOGIES, INC.

John T. Burnite
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