

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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Attorneys for Intervenor Jacqueline Hernandez

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

ALEXANDRIA ILENE KABITZKE, an
individual, on behalf of herself and on
behalf of all persons similarly situated,

Plaintiffs,

v.

CENTRO DE SALUD DE LA
COMUNIDAD DE SAN YSIDRO, INC., a
California Corporation; and Does 1 through
50, Inclusive,

Defendants.

CASE NO. **37-2022-00046873-CU-OE-CTL**

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

Hearing Date: October 9, 2024
Hearing Time: 1:30 PM

Judge: Honorable Gregory Pollack
Dept: C-71

Date Filed: November 18, 2022
Trial Date: Not set

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

3 I, Kyle Nordrehaug, declare:

4 1. I am a partner of the law firm of Blumenthal Nordrehaug Bhowmik De Blouw
5 LLP (“BNBD”), counsel for Jacqueline Hernandez, who is a plaintiff in the matter *Jacqueline*
6 *Hernandez v. Centro de Salud de la Comunidad de San Ysidro, Inc.*, San Diego Superior Court
7 Case No. 37-2021-00017369 and an intervenor in the above-entitled matter. As such, I am fully
8 familiar with the facts, pleadings and history of this matter. The following facts are within my
9 own personal knowledge, and if called as a witness, I could testify competently to the matters
10 stated herein.

11 2. This declaration is being submitted in support of the Motion for Final Approval
12 of Class Settlement. The settlement reached between Plaintiff Alexandra Kabitzke and
13 Intervenors Audrey Heredia and Jacqueline Hernandez, individually and on behalf of all
14 members of the Class, on the one hand, and Defendant Centro de Salud de la Comunidad de San
15 Ysidro (“Defendant”), on the other hand, is set forth in the Stipulation of Class Action and PAGA
16 Settlement, fully executed as of August 7, 2023 (“Original Stipulation”) and the Addendum to
17 Stipulation of Class Action and PAGA Settlement (“Addendum”).
18

19
20 **Experience of BNBD**

21 3. Over the course of the litigation, my firm has worked actively on this matter. The
22 firm credentials are reflected in the BNBD Resume, a true and correct copy of which is attached
23 hereto as Exhibit #1. Some of the major cases our firm has undertaken are also set forth therein.
24 BNBD has represented hundreds of thousands of employees in hundreds of legal matters,
25 including PAGA lawsuits and hundreds of employment class actions. BNBD’s practice is
26 devoted almost entirely to the prosecution of wage and hour class action and PAGA action
27 matters. The attorneys at BNBD have been appointed lead counsel in hundreds of contested
28

1 motions for class certification including many consolidated wage and hour matters. The
2 attorneys at my firm have extensive experience in cases involving labor code violations and
3 overtime claims. BNBD has litigated similar overtime cases against other employers on behalf
4 of employees, including cases against Sharp Healthcare, Walmart, Legoland, Cigna, HealthNet,
5 Securitas, Okta, See's Candies, Walt Disney Resorts, El Pollo Loco, Panda Express, Universal
6 Protection, Mattress Firm, Total Renal, Liberty Mutual, Union Bank, Apple, Coventry Health
7 Care, Qualxserv, Union Bank, Marriott, Kaiser / Permanente, Walgreens, and California State
8 Automobile Association. My firm has been approved as class counsel by state and federal courts
9 in California in contested class certification motions, including approvals in this Court. It is this
10 level of experience which enabled the firm to undertake the instant matter and to successfully
11 combat the resources of the defendants and their capable and experienced counsel. On account
12 of the concerted and dedicated effort this case demanded in order to properly handle and
13 prosecute, BNBD was precluded from taking other cases, and in fact, had to turn away other
14 potential fee generating cases.
15

16 4. Blumenthal Nordrehaug Bhowmik De Blouw LLP was responsible for handling
17 the briefing and argument that resulted in the landmark ruling of *Sakkab v. Luxottica Retail N.*
18 *Am., Inc.*, 803 F.3d 425 (9th Cir. 2015). There, Blumenthal Nordrehaug Bhowmik De Blouw
19 LLP overcame opposition by Littler Mendelson and amici Curiae briefs submitted by Mayer
20 Brown LLP to persuade the Ninth Circuit of the importance of the substantive rights of the State
21 of California under the California Private Attorney General Act of 2004 ("PAGA"). BNBD took
22 the lead on this case where the ruling was the reaffirmation of the PAGA statute and the *Iskanian*
23 rule. BNBD also has recently engaged in noted appellate work on the subject of class actions in
24 the California Court of Appeals resulting in the opinions handed down in *Securitas Sec. Services*
25 *USA, Inc. v. Superior Court*, 234 Cal. App. 4th 1109, 184 Cal. Rptr. 3d 568 (2015) (class or
26 representative action waiver in an employment-related arbitration agreement was
27 unenforceable); *Altman v. Solarcity Corp.*, No. D067582, 2016 Cal. App. Unpub. LEXIS 3536
28

(Ct. App. May 13, 2016) (same). In 2015, Blumenthal Nordrehaug Bhowmik De Blouw LLP received an award from the Daily Journal for Top Appellate Reversal, and I received an award from the Daily Journal as Top Labor & Employment Attorney in 2016.

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

37-2008-00095700-CU-BT-CTL (Fe. 11, 2010); *Tan v. CSAA*, Orange County Superior Court, Case No. 30-2008-00231219 (Nov. 23, 2009).

The Lodestar and Expenses of BNBD:

6. From December 21, 2020 to September 12, 2024, my firm has worked more than 899 hours prosecuting these class claims with the attorneys' hourly fee rates for attorneys ranging from \$450 to \$995, which resulted in lodestar for BNBD relating to the class claims for this period in the amount of **\$587,072.50**. Below is a general summary showing the number of hours of work performed by each attorney and paralegal in my firm on this case:

Name	Rate	Hours	Pre-Multiplier Lodestar
Norman Blumenthal	\$995	6	\$5,970.00
Kyle Nordrehaug	\$950	5.55	\$5,272.50
Aparajit Bhowmik	\$895	72	\$64,440
Nick De Blouw	\$850	59.3	\$50,405.00
Piya Mukherjee	\$750	227.15	\$170,362.50
Jeff Herman	\$750	2	\$1,400.00
Victoria Rivapalacio	\$750	86.6	\$ 64,950.00
Charlotte James	\$550	342.75	\$188,512.50
Rico Ehmann	\$675	12	\$8,100.00
Scott Blumenthal	\$450	29.8	\$13,410.00
Gerado Galaviz (paralegal)	\$250	16.6	\$4,150.00
Karla Horne (paralegal)	\$250	40.3	\$ 10,075.00
Total Lodestar			\$587,072.50

7. The rates charged by my firm are in line with the prevailing rates of attorneys in the local legal community for similar work and, if this were a commercial matter, these are the charges that would be made and presented to the client. My firm's hourly rates are based upon the Laffey Matrix with the appropriate 2% increase adjustment for Southern California. A true and correct copy of the current Laffey Matrix is attached hereto as Exhibit #3. These hourly rates have been approved by Court's throughout California, including the Courts in the Superior

1 Court of California. In fact, on August 1, 2018, District Judge Andre Birotte Jr. explicitly found
2 that Class Counsel’s “rates generally appear reasonable and ‘in line with those prevailing in the
3 [relevant] community’—the Central District of California”. Finally, the reasonableness of
4 BNBD’s hourly rates is further confirmed by comparing such rates with the rates of comparable
5 counsel practicing complex and class litigation as detailed in the National Law Journal Billing
6 Survey. See e.g. *Zest IP Holdings, LLC v. Implant Direct MFG., LLC*, 2014 U.S. Dist. LEXIS
7 167563 (S.D. Cal. 2014) (finding that “Mayer Brown's \$775 average billing rate for partners”
8 and “Mayer Brown's \$543 average associate billing rate” are reasonable rates when compared
9 within 21 other firms practicing in the Southern District of California.) This survey is useful to
10 show that BNBD’s rates are in line with the comparable rates of the defense counsel that opposes
11 these types of class claims. In another historical example, a few years ago Sheppard Mullin
12 Richter & Hampton, who is opposing counsel in many cases prosecuted by Class Counsel,
13 charged rates as high as \$875 for partners and \$535 for associates. Similarly, in years past Paul
14 Hastings, another opposing counsel in these types of cases, charged between \$900 and \$750 for
15 partners and \$755 and \$335 for associates. Thus, the rates charged by BNBD for comparable
16 work are less than these examples and are therefore undoubtedly reasonable.

17
18 8. To date, BNBD has incurred litigation expenses of **\$29,114.73**. These litigation
19 expenses include the expenses incurred for filing fees, mediation fees, court reporting charges,
20 deposition expenses, court transcripts, expert expense (Berger Consulting), attorney service
21 charges (One Legal, Knox), and legal research charges, all of which are costs normally billed to
22 and paid by the client. These costs were reasonably incurred by BNBD in the prosecution of this
23 matter and are set forth in detail in the contemporaneous billing records attached hereto as
24 Exhibit #2.¹

25
26
27
28 ¹ Exhibit #2 contains the expense billing for inception to June 2022 in one statement, and
then a second statement with the expense billing from June 2022 to September 12, 2024.

1 Service Award:

2 9. Jacqueline Hernandez has been an adequate representative for the Class and has
3 no conflicts with the class. Jacqueline Hernandez appeared for deposition and actively
4 participated in the prosecution of the class claims for over three (3) years. I respectfully request
5 that for their service as a class representative, Jacqueline Hernandez should be awarded the
6 agreed service award of \$10,000 each in accordance with the Stipulation for her time, risk and
7 effort expended on behalf of the Class as the class representative. Defendant has agreed to this
8 payment and there have been no objections to the requested service award. The Declarations of
9 Jacqueline Hernandez is also submitted herewith in support of this request. also submitted
10 herewith in support of this request. Jacqueline Hernandez worked extensively with BNBD during
11 the course of the litigation, responding to numerous requests, searching for documents, working
12 with counsel, and reviewing the settlement documentation. The Declaration of Jacqueline
13 Hernandez, submitted herewith, details the involvement, stress and risks she undertook as a result
14 of her prosecution of claims on behalf of the Class. Jacqueline Hernandez also assumed the
15 serious risk that she might possibly be liable for costs and fees to Defendant, as well as the
16 reputational risk of being “blacklisted” by other future employers for having filed a class action
17 on behalf of fellow former employees. Without her participation, cooperation and information,
18 no other employees would be receiving any benefit.
19

20 10. The payment of service awards to successful class representatives is appropriate
21 and the amount of \$10,000 is well within the currently awarded range for similar settlements.
22 The requested award is also reasonable by reference to the amounts that other California courts
23 have found to be reasonable in wage and hour class action settlements: *Zamora v. Balboa Life*
24 *& Casualty, LLC*, Case No. BC360036, Los Angeles County Superior Court (Mar. 7,
25 2013)(awarding \$25,000 service award); *Aguiar v. Cingular Wireless, LLC*, Case No. CV 06-
26 8197 DDP (AJWx)(C.D. Cal. Mar. 17, 2011)(awarding \$14,767 service award); *Magee v.*
27 *American Residential Services, LLC*, Case No. BC423798, Los Angeles County Superior Court
28

(Apr. 21, 2011)(awarding \$15,000 service award); *Mares v. BFS Retail & Commercial Operations, LLC*, Case No. BC375967, Los Angeles County Superior Court (June 24, 2010)(awarding \$15,000 service award); *Baker v. L.A. Fitness Int'l, LLC*, Case No. BC438654, L.A. County Superior Court (Dec. 12, 2012)(awarding \$10,000 service awards to three named plaintiffs); *Blue v. Coldwell banker Residential Brokerage Co.*, Case No. BC417335, Los Angeles County Superior Court (Mar. 21, 2011)(awarding \$10,000 service award); *Buckmire v. Jo-Ann Stores, Inc.*, Case No. BC394795, Los Angeles County Superior Court (June, 11, 2010)(awarding \$10,000 service awards); *Coleman v. Estes Express Lines, Inc.*, Case No. BC429042, Los Angeles County Superior Court (Oct. 3, 2013)(awarding \$10,000 service award); *Ethridge v. Universal Health Services, Inc.*, Case No. BC391958, Los Angeles County Superior Court (May 27, 2011)(awarding \$10,000 service award); *Hickson v. South Coast Auto Ins. Marketing, Inc.*, Case No. BC390395, Los Angeles County Superior Court (Mar. 27, 2012)(awarding \$10,000 service award); *Hill v. sunglass Hut Int'l, Inc.*, Case No. BC422934, Los Angeles County Superior Court (July 2, 2012)(awarding \$10,000 service award); *Kambamba v. Victoria's Secret Stores, LLC*, Case No. BC368528, Los Angeles County Superior Court, (Aug. 19, 2011)(awarding \$10,000 service award together with additional compensation for their general release); *Nevarez v. Trader Joe's Co.*, Case No. BC373910, Los Angeles County Superior Court (Jan. 29, 2010)(awarding \$10,000 service award); *Ordaz v. Rose Hills Mortuary, L.P.*, Case No. BC386500, Los Angeles County Superior Court, (Mar. 19, 2010)(awarding \$10,000 service award); *Sheldon v. AHMC Monterey Park Hosp. LP*, Case No. BC440282, Los Angeles County Superior Court (Feb. 22, 2013)(awarding \$10,000 service award); *Silva v. Catholic Mortuary Services, Inc.*, Case No. BC408054, Los Angeles County Superior Court (Feb. 8, 2011)(awarding \$10,000 enhancement award); *Weisbarth v. Banc West Investment Services, Inc.*, Case No. BC422202, Los Angeles County Superior Court (May 24, 2013)(awarding \$10,000 service award); *Lazar v. Kaiser Foundation Health Plan*, Case No. 14-cv-273289, Santa Clara County Superior Court (Dec. 28, 2015) (awarding \$10,000 service

award); *Acheson v. Express, LLC*, Case No. 109CV135335, Santa Clara County Superior Court (Sept. 13, 2011)(awarding \$10,000 service award); *Bejarano v. Amerisave Mortgage Corp.*, Case No. EDCV 08-00599 SGL (Opx)(C.D. Cal. June 22, 2010)(awarding \$10,000 service award); *Carbajal v. Sally Beauty Supply LLC*, Case No. CIVVS 1004307, San Bernardino County Superior Court (Aug. 6, 2012)(awarding \$10,000 service award); *Contreras v. Serco Inc.*, Case No. 10-cv-04526-CAS-JEMx (C.D. Cal. Sep. 10, 2012)(awarding \$10,000 service award); *Guerro v. R.R. Donnelley & Sons Co.*, Case No. RIC 10005196, Riverside County Superior Court (July 16, 2013)(awarding \$10,000 service award); *Kisliuk v. ADT Security Services Inc.*, Case No. CV08-03241 DSF (RZx)(C.D. Cal. Jan. 10, 2011)(awarding \$10,000 service award); *Morales v. BCBG Maxazria Int'l Holdings, Inc.*, Case No. JCCP 4582, Orange County Superior Court (Jan. 24, 2013)(awarding \$10,000 service award); *Barrett v. Doyon Security Services, LLC*, Case No. BS900199, BS900517, San Bernardino County Superior Court (Apr. 23, 2010)(awarding \$10,000 service award); *Zirpolo v. UAG Stevens Creek II*, Santa Clara Superior Court Case no. 17CV313457 (July 10, 2018) (awarding \$10,000 service award); *Taylor v. TIC - The Industrial Company*, U.S.D.C. Central District of California Case No. EDCV 16-186-VAP (Aug. 1, 2018) (awarding \$10,000 service award).

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 16th day of September, 2024, at San Diego, California.

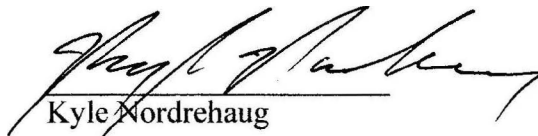

Kyle Nordrehaug

EXHIBIT #1

Blumenthal Nordrehaug Bhowmik De Blouw LLP

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Fax: (858) 551-1232

FIRM RESUME

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

ATTORNEY BIOGRAPHIES

Norman B. Blumenthal

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

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

Admitted: 1973, Illinois; 1976, California

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

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

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

Summer Intern (1971) with Harvard Voluntary Defenders

Kyle R. Nordrehaug

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

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

Admitted: 1999, California

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

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

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

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

Aparajit Bhowmik

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

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

Admitted: 2006, California

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

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

Awards: Rising Star 2015

Nicholas J. De Blouw

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

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

Admitted: 2011, California

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

Piya Mukherjee

Associate Attorney

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

Admitted: 2010, California

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

Victoria Rivapalacio

Associate Attorney

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

Admitted: 2011, California

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

Ricardo Ehmann

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2018, California; 2004, Nevada

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

Jeffrey S. Herman

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2011, California; 2016 Arizona

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

Charlotte James

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

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

Christine Levu

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2012, California

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

Andrew Ronan

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

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

Scott Blumenthal

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, New Mexico

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

Sergio Julian Puche

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2013, California

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

Trevor Moran

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, California

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

Adolfo Sanchez Contreras

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2024, California; 2014, Mexico

Educated: The Juarez University

REPORTED CASES

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

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

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

Provost v. YourMechanic, Inc., 2020 Cal. App. Lexis 955 (Oct. 15, 2020) (Court of Appeals affirmed denial of arbitration of PAGA claim, and held in a case of first impression, that there was no additional standing rules for PAGA claim brought by independent contractor);

In re Tobacco Cases II, 41 Cal. 4th 1257 (2007); Washington Mutual Bank v. Superior Court, 24 Cal. 4th 906 (2001); Rocker v. KPMG LLP, 148 P.3d 703; 122 Nev. 1185 (2006); PCO, Inc. v. Christensen, Miller, Fink, Jacobs, Glaser, Weil & Shapiro, LLP, 150 Cal. App. 4th 384 (2007); Hall v. County of Los Angeles, 148 Cal. App. 4th 318 (2007); Coshov v. City of Escondido, 132 Cal. App. 4th 687 (2005); Daniels v. Philip Morris, 18 F.Supp 2d 1110 (S.D. Cal.1998); Gibson v. World Savings & Loan Asso., 103 Cal. App. 4th 1291 (2003); Jordan v. Department of Motor Vehicles,

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No. 37-2018-00047639-CU-OE-CTL; Erickson v. Erickson – Contra Costa County Superior Court, Case No. MSC18-00307; Martin v. Menzies Aviation (USA) Inc. – San Francisco County Superior Court, Case No. CGC-18-566072; Mortimer v. Healthsouth Bakersfield Rehabilitation Hospital, LLC – Kern County Superior Court, Case No. BCV-18-102761; Alcaraz v. Red Lion Hotels Corporation – San Francisco County Superior Court, Case No. CGC-18-570310; Calhoun v. Total Transportation and Distribution, Inc. – San Diego County Superior Court, Case No. 37-2018-00058681-CU-OE-CTL; Rataul v. Overton Security Services, Inc. – Alameda County Superior Court, Case No. RG18891882; Beltran v. Compass Bank – San Diego County Superior Court, Case No. 37-2019-00024475-CU-OE-CTL; Kirshner v. Touchstone Golf, LLC – San Diego County Superior Court, Case No. 37-2018-00028865-CU-OE-CTL; Pizarro v. The Home Depot, Inc. – U.S. District Court for the Northern District of Georgia-Atlanta Division; Hatanaka v. Restore Rehabilitation, LLC – San Diego County Superior Court, Case No. 37-2018-00034780-CU-OE-CTL; Faria v. Carriage Funeral Holdings, Inc. – Contra Costa County Superior Court, Case No. MSC18-00606; Ontiveros v. Baker Concrete Construction, Inc. – Santa Clara County Superior Court, Case No. 18CV328679; Morales v. Redlands Automotive Services, Inc. – San Bernardino County Superior Court, Case No. CIVDS1807525; Ramirez v. Carefusion Resources, LLC – U.S. District Court, Southern District of California; Amster v. Starbucks Corporation – San Bernardino Superior Court, Case No. CIVDS1922016; Kutzman v. Derrel's Mini Storage, Inc. – U.S. District, Eastern District of California, Case No. 1:18-cv-00755-AWI-JLT; Marks v. Universal Propulsion Company, Inc. – Solano County Superior Court, Case No. FCS051608; Martinez v. Geil Enterprises, Inc. – Fresno County Superior Court, Case No. 17CECG01480; Teniente v. Cirrus Asset Management, Inc. – Los Angeles County Superior Court, Case No. 20STCV16302; Blackshear v. California Fine Wine & Spirits LLC – Sacramento County Superior Court, Case No. 34-2018-00245842; Warnick v. Golden Gate America West LLC – Los Angeles County Superior Court, Case No. BC714176; Bennett v. Dnata Aviation USA, Inc. – San Francisco County Superior Court, Case No. CGC-18-566911; George v. PF Stockton Fitness LLC – Sacramento County Superior Court, Case No. 34-2019-00261113-CU-OE-GDS; Oshana v. Farmers and Merchants Bank of Central California – Stanislaus County Superior Court, Case No. CV-19-003427; Vasquez v. Packaging Corporation of America – U.S. District Court, California Central District, Case No. 2:19-cv-01935-PSG-PLA; Palomino v. Zara USA Inc. – Orange County Superior Court, Case No. 30-2018-00992682-CU-OE-CXC; Simmons v. Joe & The Juice LA, LLC – San Francisco County Superior Court; Pacia v. CIM Group, L.P. – Los Angeles County Superior Court, Case No. BC709666; Flores v. Plastic Express – Los Angeles County Superior Court, Case No. BC71971; Madera v. William Warren Properties, Inc. – Orange County Superior Court, Case No. 30-2019-01055704-CU-OE-CXC; Hernandez v. Quality Custom Distribution – Orange County Superior Court, Case No. 30-2018-01010611-CU-OE-CXC; Arango v. Schlumberger Technology Corporation – Orange County Superior Court, Case No. 30-2019-01056839-CU-OE-CXC; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Ramirez v. J E H Enterprises, Inc. – San Francisco County Superior Court, Case No. CGC-19-574691; Sullen v. First Service Residential California, LLC – San Francisco County Superior Court, Case No. CGC-19-575131; Valentino v. East Bay Tire Co. – Solano County Superior Court, Case No. FCS053067; Murphy v. Rockler Retail Group, Inc. – Sacramento Superior Court, Case No. 34-2019-00251220; Shahbazian v. Onewest Bank – Los Angeles County Superior Court, Case No. 19STCV23722; Bruemmer v. Tempur Retail Stores LLC – Marin County Superior Court, Case No. CIV1803646; Antonios v. Interface Rehab, Inc. – Orange County Superior, Case No. 30-2019-01067547-CU-OE-CXC; Tavallodi v. DC Auto, Inc. – San Bernardino, Case No. CIVDS1833598; Miranda v. The Lloyd Pest Control Co. – San Diego County Superior Court, Case No. 37-2018-00052510-CU-OE-CTL; Soenardi v. Magnussen Imports, Inc. – Santa Clara County Superior Court, Case No. 18CV340003; Thai v. Team Industrial Services, Inc. – Los Angeles County Superior Court, Case No. 19STCV21953; Castillo v. A.J. Kirkwood & Associates, Inc. – Los Angeles County Superior Court, Case No. 19STCV04435; Moss v. Jabil Inc. – Alameda County Superior Court, Case No. HG20050536; Billosillo, Jr. v. Crown Energy Services, Inc. – San Diego County Superior Court,

Case No. 37-2018-00058254-CU-OE-CTL; Tarkington v. Freetime, Inc. – San Diego County Superior Court, Case No. 37-2019-00011473-CU-OE-CTL; McIntyre v. J.J.R. Enterprises, Inc. – Sacramento County Superior Court, Case No. 34-2019-00251220; Bucur v. Pharmaca Integrative Pharmacy, Inc. – San Diego County Superior Court, Case No. 37-2019-00009409-CU-OE-CTL; Batin v. McGee Air Services, Inc. – Santa Clara County Superior Court, Case No. 19CV347733; Terry v. McGee Air Services, Inc. – King County Superior Court of Washington, Case No. 19-2-3321-5 KNT; Weiss v. Niznik Behavioral Health Resources, Inc. – San Diego County Superior Court, Case No. 37-2019-00039441-CU-OE-CTL; Cavada v. Inter-Continental Hotels Group, Inc. – U.S. District Court, Southern District of California, Case No. 3:19-cv-01675-GPC-AHG; Lešević v. Spectraforce Technologies, Inc. – U.S. District Court, Northern District of California, Case No. 5:19-cv-03126-LHK; Mutchler v. Circle K Stores, Inc. – San Diego County Superior Court, Case No. 37-2020-00016331-CU-OE-CTL, Azima v. CSI Medical Group, – Santa Clara County Superior Court, Case No. 19CV345450; Porrás v. Baypointe Enterprises, LLC – Los Angeles County Superior Court, Case No. 19STCV31015; Mitchell v. Mack Trucking, Inc. – San Bernardino County Superior Court, Case No. CIVDS1928334; Watts v. T.R.L. Systems, Incorporated – Orange County Superior Court, Case No. 30-2019-01102457-CU-OE-CXC; Price v. DMSD Restaurants Inc. – San Diego County Superior Court, Case No. 37-2019-00024062-CU-OE-CTL; Jacobs v. Nortek Security & Control LLC – San Diego County Superior Court, Case No. 37-2019-0019735-CU-OE-CTL; Gonzalez v. Hub International Midwest – San Bernardino County Superior Court, Case No. CIVDS1900463; Cisneros v. Bluepearl California, Inc. – San Mateo Superior Court, Case No. 19-CIV-05707; Garcia v. Gallagher Basset Services – San Bernardino Superior Court, Case No. CIVDS2004140; Callow v. Adventist Health System/West – Placer County Superior Court, Case No. SCV0043607; Dominguez v. Kimco Facility Services, LLC – Los Angeles County Superior Court, Case No. 19STCV37592; Searles v. Robert Heath Trucking, Inc. – Los Angeles County Superior Court, Case No. 19STCY30808; Rangel v. Pioneer Hi-Bred international, Inc. – Yolo County Superior Court, Case No. CV-19-1797; Ivon v. Sinclair Television of California, Humboldt County Superior Court, Case No. DR190699; Williams v. Henkels & McCoy, Inc. – San Bernardino County Superior Court, Case No. CIVDS2003888; Cano v. Larry Green Chrysler Jeep Dodge, Inc. – Riverside County Superior Court, Case No. BLC1900184; Lopez v. Cepheid – Santa Clara County Superior Court, Case No. 19CV358827; Hernandez v. Quick Dispense, Inc. – Los Angeles County Superior Court, Case No. 19STCV29405; Lopez v. Lacoste USA, Inc. – San Bernardino County Superior Court, Case No. CIVDS1914626; Duhe v. Hospital Couriers Nevada, LLC – Contra Costa County Superior Court, Case No. MSC19-01377; Law v. Sequoia Equities, Incorporated – Contra Costa Superior Court, Case No. C19-01925; Dvorak v. Rockwell Collins, Inc. – San Diego County Superior Court, Case No. 37-2019-00064397-CU-OE-CTL; Noguera v. Metal Container Corporation – Riverside County Superior Court, Case No. RIC2003235; Leon v. Miller Event Management, Inc. – San Luis Obispo Superior Court, Case No. 19CV-0435; Leon v. Miller Event Management, Inc. – San Luis Obispo County Superior Court, Case No. 19CV-0435, Camacho-Bias v. Serve U Brands Inc. – Butte County Superior Court, Case No. 20CV00603; La Pietra v. Entertainment Partners Services, LLC – Los Angeles County Superior Court, Case No. 19STCV39529; Celis v. Theatre Box - San Diego, LLC – San Diego County Superior Court, Case No. ____; Ignacio v. Laboratory Corporation of America – U.S. District Court, California Central District, Case No. 2:19-cv-06079-AB-RAO; Kovnas v. Cahill Contractors LLC – Alameda County Superior Court, Case No. RG19037852; Hersh v. Mrs. Gooch's Natural Food – Los Angeles County Superior Court, Case No. 19STCV10444; Miller v. The Permanente Medical Group – Alameda County Superior Court, Case No. RG19045904; Vasquez v. Autoalert, LLC – Orange County Superior Court, Case No. 30-2019-01114549-CU-OE-CXC; Cavanaugh v. Morton Golf, LLC – Sacramento County Superior Court, Case No. 34-2019-00270176; Coley v. Monroe Operations, LLC – Alameda County Superior Court, Case No. RG20063188; Ramirez v. Sierra Aluminum Company – U.S. District Court, California Central District Court, Case No. 5:20-cv-00417-JGB-KK; Marrero v. Stat Med, P.C. – Alameda County Superior Court, Case No. HG19043214; Enriquez v. Solari Enterprises, Inc. – Los Angeles County Superior Court, Case No. 20STCV11129; Craig v.

Hometown Heart – San Francisco County Superior Court, Case No. CGC-20-582454; Lopez v. Hy0Lang Electric California, Inc. – San Diego County Superior Court, Case No. 37-2020-00012543-CU-OE-CTL; Heuklom v. Clara Medical Group, P.C. – San Francisco County Superior Court, Case No. CGC-20-585918; Dominguez v. Lifesafer of Northern California – Monterey County Superior Court, Case No. 20CV002586; Kiseleva v. Totalmed Staffing Inc. – U.S. District Court, California Northern District, Case No. 5:19-cv-06480; Vires v. Sweetgreen, Inc. – Santa Clara County Superior Court, Case No. 20CV365918; Kim v. Wireless Vision, LLC – San Bernardino County Superior Court, Case No. CIVDS2000074; Senoren v. Air Canada Corporation – Los Angeles County Superior Court, Case No. 20STCV13942; Clark v. Quest Diagnostics Incorporated – San Bernardino County Superior Court, Case No. CIVDS2018707; Green v. Shipt, Inc. – Los Angeles County Superior Court, Case No. 20STCV01001; Respass v. The Scion Group LLC – Sacramento County Superior County, Case No. 34-2020-00285265; Jackson v. Decathlon USA LLC – Alameda County Superior Court, Case No. RG2003024; Avacena v. FTG Aerospace Inc. – Los Angeles County Superior Court, Case No. 20STCV28767; Perez v. Butler America, LLC – Los Angeles County Superior Court, Case No. 20STCV20218; Christensen v. Carter’s Retail, Inc. – Orange County Superior Court, Case No. 30-2020-01138792-CU-OE-CXC; Astudillo v. Torrance Health Association, Inc. – Los Angeles County Superior Court, Case No. 20STCV18424; Hansen v. Holiday AI Management Sub LLC – Contra Costa County Superior Court, Case No. CIVMSC20-00779; Almahdi v. Vitamin Shoppe Industries Inc – Santa Clara County Superior Court, Case No. 20CV365150; Krisinda v. Loyal Source Government Services LLC – U.S. District Court, California Southern District, Case No. 3:20-cv-879-LAB-NLS; Ettedgui v. WB Studio Enterprises Inc – U.S. District Court, California Central District, Case No. 2:20-CV-08053-MCS (MAAx); Fernandez v. Nuvision Federal Credit Union – Orange County Superior Court, Case No. 30-2020-01161691-CU-OE-CJC; Aviles v. UPS Supply Chain Solutions, Inc. – Riverside County Superior Court, Case No. RIC2000727; Alcocer v. DSV Solutions, LLC – San Bernardino Superior Court, Case No. CIVDS2010345; Wilson v. Wholesome Harvest Baking, LLC – U.S. District Court, California Northern District, Case No. 4:20-cv-05186-YGR; Gregory v. Verio Healthcare, Inc. – Los Angeles County Superior Court, Case No. 20STCV37254; Rose v. Impact Group, LLC – Orange County Superior Court, Case No. 30-2020-01141107-CU-OE-CXC; Monasterio v. Citibank, N.A. – San Mateo County Superior Court, Case No. 20-CIV-03650; Martinez-Lopez v. Medamerica, Inc. – San Diego County Superior Court, Case No. 37-2020-00034393-CU-OE-CTL; Cox v. PRB Management, LLC – Solano County Superior Court, Case No. FCS055514; Nash v. K. Hovnanian Companies, LLC – Riverside County Superior Court, Case No. RIC2003319; Kyler v. Harbor Freight Tools USA, Inc. – San Diego County Superior Court, Case No. 37-2020-00015828-CU-OE-CTL; Roberts v. Solantic Corporation – Los Angeles County Superior Court, Case No. 20STCV41117; Price v. Mistras Group, Inc. – Los Angeles County Superior Court, Case No. 20STCV22485; Macias v. ABM Electrical & Lighting Solutions, Inc. – San Diego County Superior Court, Case No. 37-2020-00024997-CU-OE-CTL; Basu-Kesselman v. Garuda Labs, Inc. – San Francisco County Superior Court, Case No. CGC-20-585229; Armstrong v. Prometric LLC – Los Angeles County Superior Court, Case No. 20STCV29967; Ashlock v. Advantis Medical Staffing, LLC – San Diego County Superior Court, Case No. 37-2020-00022305-CU-OE-CTL; Wilson v. WXI Global Solutions, LLC – Los Angeles County Superior Court, Case No. 20STCV25007; Gandhale v. Select Rehabilitation, LLC – Monterey County Superior Court, Case No. 20CV002240; Starvoice v. G4S Secure Solutions (USA) Inc. – San Diego County Superior Court, Case No. 37-2020-00029421-CU-OE-CTL; Mbise v. Axlehire, Inc. – Alameda County Superior Court, Case No. RG20067350; Points v. C&J Services, Inc. – Kern County Superior Court, Case No. BCV-20-102483; Marshall v. PHI Air Medical, LLC – Lassen County Superior Court, Case No. 62973; Jauregui v. Cyctec Engineered Materials, Inc. – Orange County Superior Court, Case No. 30-2020-01164932-CU-OE-CXC

EXHIBIT #2

BLUMENTHAL NORDREHAUG
BHOWMIK DE BLOUW LLP
2255 CALLE CLARA
LA JOLLA, CA 92037
(858) 551-1223

SEPTEMBER 16, 2024

JACQUELINE HERNANDEZ

RE: CERIDIAN (SAN YSIDRO HEALTH)
FILE NUMBER: CA2326.001

COSTS ADVANCED

02/11/21	PAGA FILING FEE	75.00
04/21/21	FILING FEE.	1,489.69
06/03/21	MESSENGER - KNOX	147.40
06/10/21	ONELEGAL FILING FEE	12.35
06/12/21	ONELEGAL FILING FEE	38.86
08/13/21	ONE LEGAL FILING FEE	12.35
08/23/21	ONELEGAL FILING FEE	12.35
08/31/21	MESSENGER - KNOX	65.95
09/30/21	ONE LEGAL FILING FEE	74.12
10/01/21	ONE LEGAL FILING FEE	74.12
10/03/21	BERGER CONSULTING GROUP	187.50
10/06/21	ONE LEGAL FILING FEE	12.35
10/25/21	ONE LEGAL FILING FEE	12.35
10/25/21	ONE LEGAL FILING FEE	12.35
10/28/21	ONE LEGAL FILING FEE	76.18
10/28/21	ONE LEGAL FILING FEE	76.18
10/28/21	ONE LEGAL FILING FEE	76.18
10/28/21	ONE LEGAL FILING FEE	76.18

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
10/29/21	ONE LEGAL FILING FEE	76.18
10/29/21	ONE LEGAL FILING FEE	14.41
11/01/21	LEXIS NEXIS	1,128.00
11/17/21	COURT REPORTING - MOTION HEARING TRANSCRIPT.	1,017.00
12/02/21	ONE LEGAL FILING FEE	12.35
12/17/21	LEXIS NEXIS	978.00
01/01/22	LEXIS NEXIS	303.00
01/07/22	ONE LEGAL FILING FEE	17.50
01/07/22	ONE LEGAL FILING FEE	17.50
01/11/22	ONE LEGAL FILING FEE	95.23
01/11/22	ONE LEGAL FILING FEE	91.37
01/21/22	PARKING AT SAN DIEGO SUPERIOR COURT WEST BROADWAY FOR DEFENDANT'S MOTION TO COMPEL HEARING APPEARANCE	30.00
01/25/22	DOCKET DOCUMENT DOWNLOAD FEE	3.00
02/03/22	ONE LEGAL FILING FEE	12.35
02/09/22	ONE LEGAL FILING FEE	12.35
02/10/22	ONE LEGAL FILING FEE	12.35
02/24/22	ONE LEGAL FILING FEE	43.75
03/01/22	ONE LEGAL FILING FEE	32.94
03/01/22	LEXIS NEXIS	744.00
03/02/22	LEXIS NEXIS	1,430.00
03/04/22	MEDIATION FEES - JAMS. JUDGE PATE.	5,025.00
03/10/22	ONE LEGAL FILING FEE	69.49
03/14/22	SD SUPERIOR COURT ROA DOCKET DOWNLOAD	14.80
03/15/22	ONE LEGAL FILING FEE	41.00

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/21/22	ONE LEGAL FILING FEE	34.18
03/26/22	BERGER CONSULTING GROUP	375.00
04/20/22	COURT DOCUMENT DOWNLOAD COST	7.00
04/26/22	SANCTIONS PAYMENT.	2,129.50
04/27/22	ONE LEGAL FILING FEE	42.47
04/27/22	TRANSCRIPT FEE	56.00
05/01/22	LEXIS NEXIS	1,818.00
05/03/22	SAN DIEGO SUPERIOR COURT DOCKET DOWNLOAD CHARGE	55.00
05/06/22	ONE LEGAL FILING FEE	12.87
05/11/22	ONE LEGAL FILING FEE	49.42
05/11/22	ONE LEGAL FILING FEE	46.84
05/12/22	ONE LEGAL FILING FEE	23.16
05/13/22	ONE LEGAL FILING FEE	119.68
05/20/22	COURT REPORTING - HEARING TRANSCRIPT	<u>945.00</u>
	TOTAL COSTS ADVANCED	<u>\$ 19,467.15</u>
TOTAL CURRENT CHARGES		<u>\$ 19,467.15</u>

Activities Export

09/16/2024
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/27/2022	\$	Deposition Fee ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Charlotte James	1.00	\$1,433.00	-	\$1,433.00
06/10/2022	\$	San Diego Superior Court Docket Download - ROA download ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Charlotte James	1.00	\$12.80	-	\$12.80
07/12/2022	\$	San Diego Superior Court docket download ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Charlotte James	1.00	\$3.00	-	\$3.00
08/15/2022	\$	JAMS mediation fees - Judge Pate ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Chrystal Johnson	1.00	\$1,780.00	-	\$1,780.00
08/15/2022	\$	One Legal Filing Fee ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Piya Mukherjee	1.00	\$12.87	-	\$12.87
10/20/2022	\$	One Legal filing fee ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Charlotte James	1.00	\$84.93	-	\$84.93
10/20/2022	\$	One Legal filing fee ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Charlotte James	1.00	\$84.93	-	\$84.93
10/21/2022	\$	One Legal filing fee ● Unbilled	CA2326 Centro de Salud de La	Charlotte James	1.00	\$132.81	-	\$132.81

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			Comunidad de San Ysidro, Inc.					
10/21/2022	\$	One Legal filing fee ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Charlotte James	1.00	\$52.50	-	\$52.50
10/21/2022	\$	One Legal filing fee ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Charlotte James	1.00	\$12.87	-	\$12.87
10/27/2022	\$	One Legal filing fee ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Charlotte James	1.00	\$23.16	-	\$23.16
10/27/2022	\$	One Legal filing fee ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Charlotte James	1.00	\$12.87	-	\$12.87
10/28/2022	\$	One Legal filing fee ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Charlotte James	1.00	\$119.42	-	\$119.42
11/28/2022	\$	- ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Gerardo Galaviz	1.00	\$12.87	-	\$12.87
12/05/2022	\$	legal research; download document from Sa Diego Superior Court ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Victoria Rivapalacio	1.00	\$1.00	-	\$1.00

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/20/2022	\$	Court Reporting - Transcript of Jacqueline Hernandez. ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Chrystal Johnson	1.00	\$1,242.00	-	\$1,242.00
01/03/2023	\$	- ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Gerardo Galaviz	1.00	\$12.87	-	\$12.87
01/12/2023	\$	legal research; download docs from dockets ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Victoria Rivapalacio	1.00	\$3.00	-	\$3.00
01/13/2023	\$	Lexis Nexis ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Taylor Gonzalez	1.00	\$291.00	-	\$291.00
01/17/2023	\$	filing via OneLegal ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Victoria Rivapalacio	1.00	\$12.87	-	\$12.87
01/26/2023	\$	filing via One Legal ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Victoria Rivapalacio	1.00	\$12.87	-	\$12.87
02/02/2023	\$	Lexis Nexis. ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Chrystal Johnson	1.00	\$141.00	-	\$141.00
02/14/2023	\$	Court hearing - Motion to Deny Cert.	CA2326 Centro de Salud de La	Chrystal Johnson	1.00	\$1,090.00	-	\$1,090.00
							\$0.00 0.00h	\$9,647.58 0.00h

Activities Export

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Date	▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			Unbilled	Comunidad de San Ysidro, Inc.					
02/23/2023		\$	Court Reporting - Transcript of Proceeding. Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Chrystal Johnson	1.00	\$1,599.59	-	\$1,599.59
02/25/2023		\$	Court docket download charge re related action. Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Piya Mukherjee	1.00	\$19.20	-	\$19.20
03/01/2023		\$	Lexis Nexis. Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Chrystal Johnson	1.00	\$84.00	-	\$84.00
03/17/2023		\$	One Legal Filing Fee Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Piya Mukherjee	1.00	\$13.33	-	\$13.33
03/31/2023		\$	KNOX Messenger and Filing Service. Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Chrystal Johnson	1.00	\$141.05	-	\$141.05
04/03/2023		\$	Lexis Nexis Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Chrystal Johnson	1.00	\$669.00	-	\$669.00
06/06/2023		\$	Mediation Fees - Refund Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Taylor Gonzalez	1.00	-\$1,296.56	-	-\$1,296.56
								\$0.00 0.00h	\$9,647.58 0.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/22/2024	\$	Mediation Fees - JAMS. ● Unbilled	CA2326 Centro de Salud de La Comunidad de San Ysidro, Inc.	Chrystal Johnson	1.00	\$1,833.33	-	\$1,833.33
							\$0.00 0.00h	\$9,647.58 0.00h

EXHIBIT #3

LAFFEY MATRIX

History

Case Law

Contact us

Home

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375

6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363
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The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

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

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