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Attorney for Plaintiff
Kaitlin Talley

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA

KAITLIN TALLEY, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

TRAVEL NURSE ACROSS AMERICA, LLC an
Arkansas limited liability company; and DOES 1
to 100,

Defendants.

) NO. 22CV403416

)
) DECLARATION OF ADAM ROSE IN
) SUPPORT OF MOTION FOR APPROVAL
) OF PAGA SETTLEMENT

) Date: May 8, 2025

) Time: 1:30 p.m.

) Dept: 7

I, Adam Rose, declare the following:

1. I am one of the attorneys for plaintiff Kaitlin Talley. I have personal knowledge of the facts in this declaration, and if called on to testify I would competently do so.

2. I support all the arguments made in the motion to approve the PAGA settlement.

3. I am also very actively helped move this case into mediation and was aware that to prepare for mediation.

4. Attached as Exhibit A is a true and correct copy of the time spent by myself and other people at Frontier Law Center on this case showing a total lodestar of \$119,745, and costs of \$4,917.02.

5. Further, I am qualified to represent the aggrieved employees based on the below.

6. Since I graduated from University of San Francisco Law School in 1998, I have settled approximately 300 individual employment law cases (in addition to hundreds of other personal injury and habitability cases), and I have handled the following class actions from start to finish: *Ramirez v. Arevalo Landscaping*, Los Angeles Superior Court case number BC397109; *Friedrich v. La Vaquita Corp.*, Los Angeles Superior Court case number BC564432; *Carvalho v. Staff Pro*, Alameda County Superior Court case number RG16812554; *Hart v. Marriott International, Inc.*, United States District Court case number 8:17-cv-2021-JVS; *Cole v. Saucey, Inc.*, Los Angeles Superior Court case number BC707895; *Rowe v. Laura Geller Beauty, LLC*, United States Bankruptcy Court case number 1:18-bk-14102-MEW (New York); *Rowe v. Ulta Salon, Beauty, and Cosmetics, LLC*, Sacramento Superior Court case number 34-2019-00267231, *Luna et al. v. Triple Canopy, Inc.*, Santa Clara Superior Court case number 19CV345169, *Smith v. Budget Rent A Car System, Inc.*, United States District Court case number 2:19-cv-4720-SVW, *Shrum v. Sacramento Elite Patrol, Inc.*, Sacramento Superior Court case number 34-2019-002767231, *Morris v. Blue Mountain Enterprises, LLC*, Solano County Superior Court case number FCS035858, *Lopez v. Mac Arthur Co.*, Riverside County Superior Court case number RIC1905043, *Diaz v. Marriott International, Inc.*, San Diego Superior Court case number 37-2019-00044740, *Castellanos et al. v. Southwest Patrol, Inc.*, San Diego Superior Court case number 37-2020-00024905, *Inacio v. Land O' Lakes*, Merced Superior Court case number 19CV-04520, GSG Wage and Hour Cases, San Diego Superior Court case number JCCP5055, *Marroquin v. Teleferic Barcelona*, Santa Clara Superior Court case number 21CV388821, *Gonzalez, et al. v. Golden Gate Bell*, Contra Costa Superior Court case number MSC21-00956, *Navarro Garcia v. Widdicombe Enterprises, Inc.*, Orange County Superior Court case number 30-2021-01235358, *Gonzalez v. Seven Seas Associates, LLC*, San Diego Superior Court case number 37-2023-00042280-CU-OE-CTL, *Navarro v. Squad Security CA, Inc.*, Los Angeles Superior Court case number 22STCV24108, and *Gagliardi v. Ralph Lauren Retail, Inc.*, Riverside County Superior Court case number CVRI2103581.

7. I also actively participated in and helped finalize class action settlements in the following: *Arya Security Services Cases*, Orange County Superior Court case number JCCP4991, *Allen v. Caine & Weiner*, Los Angeles Superior Court case number BC465806, *Terry v. SHAC, LLC dba Sapphire*, Eighth Judicial District of Nevada case number A-09-602800-C, *Carter v. Fantasy Castle*, Los Angeles Superior Court case number BC433666, *Blunt v. Valley Ball Cabaret*, Los Angeles Superior Court case number BC380265, *Hills v. Todd & Katie, Inc.*, Los Angeles Superior Court case number BC437919, *Lawrenz, et al. v. Blacktalon Enterprises, Inc.*, et al., Sacramento Superior Court case number 34-2019-00267748, *Stricklin, et al. v. First Alarm Security & Patrol, Inc.*, Santa Clara Superior Court case number 18CV323753, *Rushing v. Security Intelligence Specialist Corporation*, San Mateo Superior Court case number 18-CIV-01808, *Massey v. Hummel + Mann*, Santa Barbara Superior Court case number 21CV02985, *Sunshine Retirement Wage and Hour Cases*, Sacramento Superior Court case number JCCP5247, and *Houser v. Fish House Vera Cruz*, San Diego Superior Court case number 37-2023-00045659-CU-OE-NC.

8. I helped obtain class certification for *Van Bebber v. Dignity Health*, U.S. District Court case number 1:19-cv-00264, and I obtained FLSA certification and finalized FLSA settlements in *Desio v. Russell Road Food & Beverage*, U.S. District Court case number 2:15-1440-GMN (D.Nev.) and *Aguilar v. American-Paragon Protective Services*, U.S. District Court case number 5:20-cv-01892-EJD (N.D.Cal.).

9. I handled and finalized settlements on the following PAGA-only cases: *McAfee v. Chief Protective Services*, Riverside County Superior Court case number RIC1721984, *Hall v. Pirch, Inc.*, San Diego Superior Court case number 37-2016-00036606, *Green v. American Guard*, Los Angeles Superior Court case number BC688437, *Hernandez v. Contemporary Services Corp.*, Los Angeles Superior Court case number BC684206, *McNeal v. Platinum Security Services*, Los Angeles Superior Court case number 19STCV05709, *Cruz v. Holder Construction Group, LLC*, Santa Clara Superior Court case number 19CV341862, *Nunes v. Westmont Living*, San Luis Obispo Superior Court case number 19CV-0935, *Gibson v. Swift Transportation Co.*, United States District Court case

1 number 5:20-cv-00318-ODW, *Katabyan v. Awesome Doughnut*, Los Angeles Superior
2 Court case number 20STCV19903, *Ayoub v. Harry Winston, Inc.*, United States District
3 Court case number 4:21-cv-01599-JST, *Williams v. St. Joseph Personal Care Services,*
4 *LLC*, Orange County Superior Court case number 30-2020-01134268-CU-OE-CXC,
5 *Rodriguez v. Modern Parking, Inc.*, Los Angeles Superior Court case number
6 23STCV00936, *Valdivieso v. Universal Auto Group*, Los Angeles Superior Court case
7 number 23GDCV00191, *Hanna v. Ulta Salon, Cosmetics & Fragrance, Inc.*, Sacramento
8 Superior Court case number 34-2019-00252198, *Bullock v. Atria Management*, Nevada
9 County Superior Court case number CU22-086285, *Ramirez-Batres v. Lee Mechanical*
10 *Contractors, Inc.*, Kern County Superior Court case number BCV-23-102686, *Mathews v.*
11 *Assignment America, LLC*, Los Angeles Superior Court case number 22STCV13033,
12 *Castro v. Clay Lacy Aviation, Inc.*, Los Angeles Superior Court case number
13 21VECV00304, *Elwood v. Alameda Healthcare & Wellness Center, LLC*, Alameda County
14 Superior Court case number 23CV028398, *Vasquez v. Anton Devco, Inc.*, Sacramento
15 County Superior Court case number 34-2021-00310326, *Selvy-Medina v. Nothing Bundt*
16 *Cakes*, San Diego Superior Court case number 37-2023-00041657-CU-OE-CTL, *Lear v.*
17 *DNS2 Management, LLC*, Riverside County Superior Court case number CVRI2304984,
18 and *Barboza et al. v. Mission Federal Credit Union*, San Diego Superior Court case number
19 37-2019-00024579-CU-OE-CTL.

20 10. Thus, I strongly believe the settlement is fair, reasonable, and adequate, and I
21 respectfully request the court to grant the motion for preliminary approval.

22
23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct.

25 Date: December 19, 2024

/s/ Adam Rose

Exhibit A

Time, Fees and Expenses

for Kaitlin Mahealani Talley - Employment Claim - Travel Nurse Across America, LLC

Time and Fee entries

Date	Activity	Description	Staff	Duration	Rate	Billable?	Write Off?	Status	Total
12/18/2024		Mediation notes reviewed	Manny Starr	0.10	\$750.00	True	No	-	\$75.00
12/18/2024		First Amended Complaint (00663303xAF06A) reviewed	Manny Starr	0.10	\$750.00	True	No	-	\$75.00
12/18/2024		Talley v. TNAA - Long Form PAGA Settlement Agreement (fully executed) (1) reviewed	Manny Starr	0.10	\$750.00	True	No	-	\$75.00
12/18/2024		Review further edits to motion for approval	Adam Rose	2.10	\$850.00	True	No	-	\$1,785.00
12/18/2024		Draft Talley Kullar Analysis	Manny Starr	2.80	\$750.00	True	No	-	\$2,100.00
12/16/2024		Work on supporting declaration	Adam Rose	4.10	\$850.00	True	No	-	\$3,485.00
12/11/2024		Edit supporting declaration for application	Adam Rose	1.80	\$850.00	True	No	-	\$1,530.00
12/6/2024		Review stipulation to advance hearing	Adam Rose	1.20	\$850.00	True	No	-	\$1,020.00
12/5/2024		Review draft of proposed order for motion	Adam Rose	0.80	\$850.00	True	No	-	\$680.00
12/5/2024		Matter admin	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
11/13/2024		Obtain fully signed settlement agreement	Adam Rose	0.30	\$850.00	True	No	-	\$255.00
11/13/2024		Long Form PAGA agreement Final Plaintiff's signatures reviewed	Adam Rose	0.10	\$850.00	True	No	-	\$85.00
11/13/2024		Talley v. TNAA - Long Form PAGA Settlement Agreement (fully executed) (1) created	Adam Rose	0.10	\$850.00	True	No	-	\$85.00
11/13/2024		Talley v. TNAA - Long Form Individual Settlement Agreement (fully executed) created	Adam Rose	0.10	\$850.00	True	No	-	\$85.00
11/11/2024		1 email sent/reviewed regarding Talley - post mediation status conference and long form individual settlement agreement	Manny Starr	0.10	\$750.00	True	No	-	\$75.00
11/7/2024		Provide revisions to PAGA settlement agreement	Adam Rose	1.40	\$850.00	True	No	-	\$1,190.00
11/4/2024		Disbursement Agreement - Talley.docx reviewed	Taylor McCarthy	0.10	\$75.00	True	No	-	\$7.50

10/29/2024	1 email sent/reviewed regarding Completed: Complete with DocuSign: Disbursement Agreement - Talley.docx	Manny Starr	0.10	\$750.00	True	No	-	\$75.00
10/29/2024	1 email sent/reviewed regarding Talley indy settlement	Taylor McCarthy	0.10	\$75.00	True	No	-	\$7.50
10/29/2024	Talley Settlement Check Ltr. 10.29.24 created	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
10/29/2024	Matter admin	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
10/18/2024	Review draft of PAGA settlement agreement	Adam Rose	1.50	\$850.00	True	No	-	\$1,275.00
10/9/2024	Provide revisions to individual settlement agreement	Adam Rose	1.20	\$850.00	True	No	-	\$1,020.00
10/8/2024	Review status letter to client	Adam Rose	0.50	\$850.00	True	No	-	\$425.00
10/8/2024	1 email sent/reviewed regarding Completed: Complete with DocuSign: Long Form Indy Settlement Agreement Akerman_Final.pdf	Taylor McCarthy	0.10	\$75.00	True	No	-	\$7.50
10/8/2024	Talley 10.08.2024 created	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
10/7/2024	Joint Report Re Outcome of Mediation created	Cynthia Rodriguez	0.20	\$225.00	True	No	-	\$45.00
10/1/2024	Review draft of individual settlement agreement	Adam Rose	1.50	\$850.00	True	No	-	\$1,275.00
9/30/2024	Prepare draft of mediation status report	Adam Rose	1.20	\$850.00	True	No	-	\$1,020.00
9/27/2024	1 email sent/reviewed regarding Talley v. Travel Nurse Across America - Mediator's Proposal	Taylor McCarthy	0.10	\$75.00	True	No	-	\$7.50
9/27/2024	PAGA MOU - Talley v. TNAA created	Taylor McCarthy	0.10	\$75.00	True	No	-	\$7.50
9/25/2024	Review final version of MOU	Adam Rose	0.50	\$850.00	True	No	-	\$425.00
9/20/2024	1 email sent/reviewed regarding Talley v. Travel Nurse Across America, LLC - Plaintiff's Confidential Mediation Brief	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
9/19/2024	Review draft of MOU	Adam Rose	0.90	\$850.00	True	No	-	\$765.00
9/19/2024	Further review, revise MOU. Discuss with co-counsel	Manny Starr	1.20	\$750.00	True	No	-	\$900.00
9/18/2024	Monitor mediation	Adam Rose	2.50	\$850.00	True	No	-	\$2,125.00
9/18/2024	Phone Call To: Kaitlin Mahealani Talley	Manny Starr	0.10	\$750.00	True	No	-	\$75.00
9/18/2024	Mediation (via Zoom) attended	Manny Starr	8.00	\$750.00	True	No	-	\$6,000.00

9/18/2024	Plaintiff's Confidential Mediation Brief reviewed	Manny Starr	0.30	\$750.00	True	No	-	\$225.00
9/18/2024	Per diem advertisement created	Manny Starr	0.10	\$750.00	True	No	-	\$75.00
9/18/2024	Mediation notes created, then edited	Manny Starr	0.60	\$750.00	True	No	-	\$450.00
9/18/2024	Stipulation & Order for Continued Stay Pending Mediation reviewed	Manny Starr	0.10	\$750.00	True	No	-	\$75.00
9/18/2024	TALLEY PAGA LETTER CERT 9.2.22 reviewed	Manny Starr	0.10	\$750.00	True	No	-	\$75.00
9/18/2024	Employment intake 05.03.2022 Kaitlin Mahealani Talley v. TNAA reviewed	Manny Starr	0.20	\$750.00	True	No	-	\$150.00
9/18/2024	Mediation notes created, then edited	Manny Starr	1.60	\$750.00	True	No	-	\$1,200.00
9/18/2024	1 email sent/reviewed regarding Talley v. TNAA	Manny Starr	0.10	\$750.00	True	No	-	\$75.00
9/18/2024	Work on MOU	Manny Starr	1.20	\$750.00	True	No	-	\$900.00
9/17/2024	Prep for mediation, review file	Manny Starr	2.50	\$750.00	True	No	-	\$1,875.00
9/16/2024	Review draft damages calc from expert, emails regarding calcs	Manny Starr	1.20	\$750.00	True	No	-	\$900.00
9/13/2024	Revise mediation brief	Adam Rose	4.10	\$850.00	True	No	-	\$3,485.00
9/13/2024	Review mediation brief	Manny Starr	1.00	\$750.00	True	No	-	\$750.00
9/9/2024	Obtain clarifications about mediation data	Adam Rose	0.60	\$850.00	True	No	-	\$510.00
8/21/2024	3 emails sent/reviewed regarding Talley v. TNAA - Privileged Settlement Communication - Mediation Data Request	Cynthia Rodriguez	0.50	\$225.00	True	No	-	\$112.50
8/21/2024	Talley v. TNAA -TNAA_000001 - TNAA_000248 [CONFIDENTIAL - MEDIATION PRIVILEGE] (sent_08.19.24) created	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
8/21/2024	Memo created - MEDIATION DATA	Cynthia Rodriguez	0.20	\$225.00	True	No	-	\$45.00
8/19/2024	Review email re: PAGA count	Adam Rose	0.80	\$850.00	True	No	-	\$680.00
7/24/2024	Emails re mediation, damages calculations	Manny Starr	1.50	\$750.00	True	No	-	\$1,125.00
7/9/2024	Liaison with expert	Adam Rose	0.40	\$850.00	True	No	-	\$340.00
6/26/2024	Review status letter to client	Adam Rose	0.90	\$850.00	True	No	-	\$765.00
6/13/2024	Arb Mgmt Conf Order reviewed	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50

5/15/2024	1 email sent/reviewed regarding Talley v. TNAA - Privileged Settlement Communication - Mediation Data Request	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
5/14/2024	Review and edit mediation data letter	Adam Rose	1.30	\$850.00	True	No	-	\$1,105.00
5/14/2024	Review informal discovery requests	Manny Starr	0.60	\$650.00	True	No	-	\$390.00
5/8/2024	Confirm arbitration closed	Adam Rose	0.20	\$850.00	True	No	-	\$170.00
5/2/2024	Correspondence with AAA to close arbitration	Adam Rose	0.20	\$850.00	True	No	-	\$170.00
4/26/2024	Matter admin	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
4/26/2024	Invoice - AKERMAN (Travel Nurse) created	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
4/26/2024	Rate and Fee Schedule - Monique Ngo-Bonnici (Signature) created	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
4/26/2024	1 email sent/reviewed regarding Talley v. Travel Nurse order	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
4/26/2024	1 email sent/reviewed regarding Case ID: NLNYZ - Talley v. Travel Nurse Across America - Monique Ngo-Bonnici, Esq. - Hearing Notice and Invoices	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
4/25/2024	Review and edit stipulation to return case to court	Adam Rose	1.70	\$850.00	True	No	-	\$1,445.00
4/25/2024	Rate and Fee Schedule - Monique Ngo-Bonnici (Signature) created	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
4/23/2024	Confirm order signed re: returning case to court	Adam Rose	0.30	\$850.00	True	No	-	\$255.00
4/19/2024	Continue to attempt to set up mediation	Adam Rose	0.30	\$850.00	True	No	-	\$255.00
4/10/2024	Emails to begin setting up mediation	Adam Rose	0.30	\$850.00	True	No	-	\$255.00
4/1/2024	Discussion internally re: mediation options	Adam Rose	0.90	\$850.00	True	No	-	\$765.00
4/1/2024	Respondent Travel Nurse_s Response to Claimaint_s Request for Production, Set One reviewed	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
4/1/2024	Memo created - Call with defendant	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
4/1/2024	Prep for and attend call re mediation	Manny Starr	1.00	\$650.00	True	No	-	\$650.00
3/27/2024	Phone Call with OPC re Discovery Responses (Co Counsel Handling) attended	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
3/27/2024	Phone Call with OPC re Discovery Responses (Co Counsel Handling) attended	Manny Starr	0.50	\$650.00	True	No	-	\$325.00

3/19/2024	1 email sent/reviewed regarding Talley v. Travel Nurse Across America - Claimant's Responses to Discovery and Document Production	Cynthia Rodriguez	0.20	\$225.00	True	No	-	\$45.00
3/18/2024	Review meet and confer letter to Respondent	Adam Rose	1.70	\$850.00	True	No	-	\$1,445.00
3/18/2024	Research regular rate issues	Manny Starr	2.50	\$650.00	True	No	-	\$1,625.00
3/18/2024	Memo edited - Theory of the RR claim	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
3/18/2024	1 email sent/reviewed regarding Talley v. Travel Nurse Across America, LLC - Meet and Confer Re: Discovery	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
3/16/2024	Research re: per diem payments	Adam Rose	1.80	\$850.00	True	No	-	\$1,530.00
3/14/2024	1 email sent/reviewed regarding Talley v. Travel Nurse Across America, Case No. 22CV403416	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
3/11/2024	Matter admin	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
3/11/2024	2 emails sent/reviewed regarding Talley v. Travel Nurse Across America, Case No. 22CV403416	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
2/21/2024	1 email sent/reviewed regarding Talley/TNAA discovery	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
2/20/2024	K Talley EE file reviewed	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
2/20/2024	Wage statements Kaitlin Mahealani Talley v. TNAA reviewed	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
2/20/2024	Memo drafted, research - Theory of the RR claim	Manny Starr	2.00	\$650.00	True	No	-	\$1,300.00
2/20/2024	1 email sent/reviewed regarding Kaitlin Talley v. Travel Nurse Across America, LLC	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
2/20/2024	1 email sent/reviewed regarding Talley/TNAA discovery	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
2/20/2024	TNAA_CONF_000001 - TNAA_CONF_000096 (02.20.24) created	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
2/14/2024	Review final version of discovery responses	Adam Rose	2.30	\$850.00	True	No	-	\$1,955.00
2/14/2024	Edit discovery responses	Adam Rose	2.40	\$850.00	True	No	-	\$2,040.00
2/13/2024	1 email sent/reviewed regarding Talley v. Travel Nurse Across America, LLC	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
1/26/2024	Review deposition notice to claimant	Adam Rose	1.10	\$850.00	True	No	-	\$935.00
1/26/2024	Review deposition notice to Respondent	Adam Rose	1.60	\$850.00	True	No	-	\$1,360.00

1/26/2024	2024.01.26 Respondent TNAA's Notice of Deposition to Claimant Kaitlin Talley created	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
1/26/2024	Claimant's Notice of Taking Deposition of Respondent's PMQ (00680022xAF06A) created	Cynthia Rodriguez	0.10	\$225.00	True	No	-	\$22.50
1/17/2024	Review draft of meet and confer correspondence	Adam Rose	1.50	\$850.00	True	No	-	\$1,275.00
1/16/2024	Matter admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
1/16/2024	Memo created - State Case	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
1/3/2024	Review order for department reassignment	Adam Rose	0.30	\$850.00	True	No	-	\$255.00
1/3/2024	Order and Ntc of Reassignment of Case to CFA created	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
12/28/2023	Review discovery to Claimant	Adam Rose	2.10	\$850.00	True	No	-	\$1,785.00
12/28/2023	Review discovery to Respondent	Adam Rose	2.30	\$850.00	True	No	-	\$1,955.00
12/22/2023	Review correspondence from AAA	Adam Rose	0.40	\$850.00	True	No	-	\$340.00
12/18/2023	Memo edited - 4/4/2013 meeting with Janelle	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
12/1/2023	Summarize dates/deadlines from arbitration scheduling order	Adam Rose	1.40	\$850.00	True	No	-	\$1,190.00
11/30/2023	Review arbitration case management order	Adam Rose	1.20	\$850.00	True	No	-	\$1,020.00
11/28/2023	Participate in scheduling conference, review AAA employment protocols	Adam Rose	2.40	\$850.00	True	No	-	\$2,040.00
11/28/2023	conference call-AAA attended	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
11/28/2023	conference call-AAA attended	Manny Starr	0.50	\$650.00	True	No	-	\$325.00
11/17/2023	Review draft of joint repoert	Adam Rose	1.20	\$850.00	True	No	-	\$1,020.00
11/17/2023	Matter admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
11/1/2023	Review arbitrator's order for scheduling conference	Adam Rose	0.30	\$850.00	True	No	-	\$255.00
10/31/2023	Review order setting scheduling conference	Adam Rose	0.60	\$850.00	True	No	-	\$510.00
10/16/2023	Review notice of assignment of arbitrator	Adam Rose	0.50	\$850.00	True	No	-	\$425.00
9/25/2023	Review answer to demand for arbitration	Adam Rose	1.20	\$850.00	True	No	-	\$1,020.00
9/20/2023	Review arbitrator strike list	Adam Rose	1.10	\$850.00	True	No	-	\$935.00

9/8/2023		Review further correspondence from AAA	Adam Rose	0.80	\$850.00	True	No	-	\$680.00
8/25/2023		Review correspondence from AAA	Adam Rose	0.90	\$850.00	True	No	-	\$765.00
8/17/2023		Services provided on 8/17/2023	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
8/17/2023		Off-**CMC- Date of addl or further CASE MANAGEMENT CONF (Further CMC) (DEPT 1) attended	Manny Starr	0.50	\$650.00	True	No	-	\$325.00
8/4/2023		Review demand for arbitration	Adam Rose	2.10	\$850.00	True	No	-	\$1,785.00
8/1/2023		Matter admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
7/20/2023		Services provided on 7/20/2023	Adam Rose	0.50	\$800.00	True	No	-	\$400.00
7/14/2023		Review tentative ruling	Adam Rose	0.60	\$850.00	True	No	-	\$510.00
7/6/2023		Matter admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
7/6/2023		COA - mc040 created	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
7/6/2023		Order deeming case complex reviewed	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
6/16/2023		Review reply to opposition	Adam Rose	2.50	\$850.00	True	No	-	\$2,125.00
6/5/2023		Review final version of opposition	Adam Rose	1.80	\$850.00	True	No	-	\$1,530.00
6/5/2023		Services provided on 6/5/2023	Collette Navasartian	0.10	\$225.00	True	No	-	\$22.50
5/31/2023		Further edit opposition	Adam Rose	2.10	\$850.00	True	No	-	\$1,785.00
5/30/2023		Review and edit opposition to motion	Adam Rose	4.10	\$850.00	True	No	-	\$3,485.00
5/23/2023		Services provided on 5/23/2023	Collette Navasartian	0.10	\$225.00	True	No	-	\$22.50
5/22/2023		Review motion to compel arbitration	Adam Rose	4.10	\$850.00	True	No	-	\$3,485.00
4/11/2023		Matter admin	Manny Starr	0.10	\$650.00	True	No	-	\$65.00
4/5/2023		Memo created - 4/4/2013 meeting with Janelle	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
3/31/2023		Phone Call From: Akerman LLP	Daniel Ginzburg	0.10	\$425.00	True	No	-	\$42.50
3/31/2023		Matter admin	Mary Mars	0.10	\$225.00	True	No	-	\$22.50
3/30/2023		Review notes from CMC	Adam Rose	0.40	\$850.00	True	No	-	\$340.00

3/30/2023		Services provided on 3/30/2023	Adam Rose		0.50	\$800.00	True	No	-		\$400.00
3/14/2023		Review updated joint statement	Adam Rose		0.60	\$850.00	True	No	-		\$510.00
3/2/2023		Matter admin	Mary Mars		0.10	\$150.00	True	No	-		\$15.00
2/24/2023		Arb agreement - Talley reviewed	Manny Starr		0.10	\$550.00	True	No	-		\$55.00
2/2/2023		Matter admin	Mary Mars		0.10	\$150.00	True	No	-		\$15.00
2/2/2023		Order Granting Defendant's Challenge as to TCZ created	Mary Mars		0.10	\$150.00	True	No	-		\$15.00
2/1/2023		Review order re: reassignment	Adam Rose		0.20	\$850.00	True	No	-		\$170.00
1/31/2023		Review defense peremptory challenge	Adam Rose		0.30	\$850.00	True	No	-		\$255.00
1/31/2023		00662268 reviewed	Mary Mars		0.10	\$150.00	True	No	-		\$15.00
1/31/2023		Matter admin	Mary Mars		0.10	\$150.00	True	No	-		\$15.00
1/30/2023		Matter admin	Mary Mars		0.10	\$150.00	True	No	-		\$15.00
1/30/2023		1 email sent/reviewed regarding Kaitlin Talley v. Travel Nurse Across America, LLC- SERVICE OF NOTICE	Mary Mars		0.10	\$150.00	True	No	-		\$15.00
1/30/2023		Talley- Notice of Appearance AR v2 created	Mary Mars		0.10	\$150.00	True	No	-		\$15.00
1/27/2023		Matter admin	Mary Mars		0.10	\$150.00	True	No	-		\$15.00
1/26/2023		Get notice of remote appearance	Adam Rose		0.20	\$850.00	True	No	-		\$170.00
1/24/2023		1 email sent/reviewed regarding Your case against Travel Nurse Across America, LLC	Manny Starr		0.10	\$550.00	True	No	-		\$55.00
1/19/2023		Review changes to joint status statement	Adam Rose		0.40	\$850.00	True	No	-		\$340.00
1/17/2023		Review revisions to CMC statement	Adam Rose		1.10	\$850.00	True	No	-		\$935.00
1/12/2023		3 emails sent/reviewed regarding Your case against Travel Nurse Across America, LLC	Manny Starr		0.10	\$550.00	True	No	-		\$55.00
1/9/2023		Phone Call To: Kaitlin Mahealani Talley	Mary Mars		0.10	\$150.00	True	No	-		\$15.00
1/9/2023		called client	Mary Mars		0.10	\$150.00	True	No	-		\$15.00
1/4/2023		Email to defense re: arbitration agreement	Adam Rose		0.20	\$850.00	True	No	-		\$170.00
1/4/2023		K Talley EE file reviewed	Manny Starr		0.10	\$550.00	True	No	-		\$55.00

1/4/2023	3 emails sent/reviewed regarding Your case against Travel Nurse Across America, LLC	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
1/4/2023	Arb agreement - Talley created	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
12/23/2022	Phone Call To: Kaitlin Mahealani Talley	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
12/23/2022	1 email sent/reviewed regarding Your case against Travel Nurse Across America, LLC	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
12/22/2022	Review draft of joint statement	Adam Rose	2.40	\$850.00	True	No	-	\$2,040.00
12/16/2022	Phone Call To: Kaitlin Mahealani Talley	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
12/16/2022	K Talley EE file reviewed	Manny Starr	0.30	\$550.00	True	No	-	\$165.00
12/16/2022	TALLEY PAGA LETTER CERT 9.2.22 reviewed	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
11/8/2022	Review amended complaint	Adam Rose	2.50	\$850.00	True	No	-	\$2,125.00
10/24/2022	Matter admin	Taylor May	0.10	\$150.00	True	No	-	\$15.00
10/20/2022	1 email sent/reviewed regarding Talley v. Travel Nurse Across America, LLC	Taylor May	0.10	\$150.00	True	No	-	\$15.00
10/15/2022	Matter admin	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
10/15/2022	1 email sent/reviewed regarding Talley v. TNAA	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
10/14/2022	Review notice of appearance	Adam Rose	0.30	\$850.00	True	No	-	\$255.00
10/14/2022	Matter admin	Taylor May	0.10	\$150.00	True	No	-	\$15.00
10/13/2022	Matter admin	Manny Starr	0.10	\$550.00	True	No	-	\$55.00
10/12/2022	Complex fee paid	Adam Rose	0.20	\$850.00	True	No	-	\$170.00
10/4/2022	Review order re: complex	Adam Rose	0.30	\$850.00	True	No	-	\$255.00
9/29/2022	Review notice of CMC	Adam Rose	0.30	\$850.00	True	No	-	\$255.00
9/23/2022	Review email from defense	Adam Rose	0.30	\$850.00	True	No	-	\$255.00
9/21/2022	Edit complaint	Adam Rose	2.80	\$850.00	True	No	-	\$2,380.00
9/21/2022	Review personnel records	Adam Rose	3.10	\$850.00	True	No	-	\$2,635.00
9/20/2022	Review draft of complaint	Adam Rose	3.20	\$850.00	True	No	-	\$2,720.00

9/2/2022	Final review of PAGA letter, prepare for filing with LWDA	Manny Starr	1.50	\$750.00	True	No	-	\$1,125.00
8/30/2022	File review, talk with client, discuss with co-counsel	Manny Starr	3.50	\$750.00	True	No	-	\$2,625.00
7/5/2022	Initial review of employee file, strategy development	Manny Starr	2.50	\$750.00	True	No	-	\$1,875.00
5/4/2022	Initial file review, calls with client	Manny Starr	4.00	\$750.00	True	No	-	\$3,000.00
Total - Write offs			0.00					\$0.00
Total - Unbillable			0.00					\$0.00
Total - Billable			0.00					\$119,745.00
Total			152.80					\$119,745.00

Expense entries

Date	Activity	Description	Staff	Quantity	Price	Billable?	Write Off?	Status	Total
1/31/2023		One Legal CC Sale: 04712708	Mary Mars	1	\$19.52	True	No	-	\$19.52
9/4/2024		Mediation Fee - Signature Resolution PR34014 - 50%	Kirsten Starr	1	\$4,497.50	True	No	-	\$4,497.50
10/11/2024		JT Calcs Invoice	Dane Huntsman	1	\$400.00	True	No	-	\$400.00
Total - Write offs									\$0.00
Total - Unbillable									\$0.00
Total - Billable									\$4,917.02
Total									\$4,917.02