

Edwin Aiwarzian (SBN 232943)
Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
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Attorneys for Plaintiffs and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

WILLIAM CAMPOS; individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act; JUANITA
HERNANDEZ; individually, and on behalf of
other members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiffs,

vs.

MOTIVE ENERGY, INC., a California
corporation; MOTIVE ENERGY
TELECOMMUNICATIONS GROUP, INC., a
California corporation; ADVANCED
CHARGING TECHNOLOGIES, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 30-2016-00828352-CU-OE-CXC

Honorable William D. Claster
Department CXI 04

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF
EDWIN AIWAZIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES,
COSTS, AND SERVICE PAYMENTS**

[Supplemental Brief in Support of Motion for
Final Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Service Payments;
Supplemental Declaration of Lindsay Kline;
and [Revised Proposed] Final Approval Order
and Judgment filed concurrently herewith]

Date: May 10, 2019
Time: 9:00 a.m.
Department: CXI04

Complaint Filed: January 5, 2016
FAC Filed: September 22, 2016
SAC Filed: December 2, 2016
Trial Date: None Set

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers for Justice, PC, attorneys of record for Plaintiffs William Campos and Juanita Hernandez and Williams Campos ("Plaintiffs"). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

2. On March 14, 2019, the Court issued a tentative ruling on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Payments ("Motion for Final Approval"), which was adopted as the ruling of the Court on March 15, 2019 ("March 15, 2019 Order"), requesting that additional information be provided and continuing the Final Approval Hearing to May 10, 2019. Attached hereto as "EXHIBIT A" is a true and correct copy of the March 15, 2019 Order.

3. Per the Court's instruction, the parties executed Amendment No. 3 to Joint Stipulation of Class Action and PAGA Settlement and Release ("Amendment No. 3"), a true and correct copy of which is attached hereto as "EXHIBIT B." A redline version of Amendment No. 3 showing how the original terms of the settlement have been revised is attached hereto as "EXHIBIT C."

4. Attached hereto as "EXHIBIT D" is a true and correct copy of the revised Attorney Task and Time Chart that reflects the identities of the attorneys who performed work in this matter and the time that each attorney spent on the tasks listed therein.

5. Class Counsel has undertaken multiple hours of work in connection with this case. I have reviewed the firm's records, the work performed by me, as well as the work performed by others at our firm, and hereby attest that our firm has spent a total of at least 713.30 hours on the case over the course of this litigation.

6. The following hourly rates of compensation are commensurate with the individual background, training, and experience of the attorneys that are listed below, who worked on this matter, as well as our firm, in litigation of class actions and complex wage-and-hour matters, as

further outlined in the Declaration of Edwin Aiwarzian submitted in support of the Motion for Final Approval:

Lawyers for Justice, PC –Attorney Hours, Rates, and Lodestar						
<i>Attorneys</i>	<i>Title</i>	<i>CA Bar No.</i>	<i>Year of CA Admission</i>	<i>Rate</i>	<i>Total Hours</i>	<i>Lodestar</i>
Edwin Aiwarzian	Managing Member	232943	2004	\$650	235	\$152,750
Arby Aiwarzian	Sole Shareholder	269827	2010	\$575	62.60	\$35,995
Joanna Ghosh	Senior Member	272479	2010	\$525	14.60	\$7,665
Jill J. Parker	Senior Member	274230	2010	\$525	9.50	\$4,987.50
Arya Djafroudi	Member	299390	2014	\$400	91	\$36,400
Elizabeth Parker-Fawley	Member	301592	2014	\$400	243.10	\$97,240
Julia McGuinness	Member	305540	2015	\$400	1.75	\$700
Stephanie S. Ponck	Member	306205	2015	\$400	12.25	\$4,900
Tiffany J. Hyun	Member	311743	2016	\$400	26.25	\$10,500
Danielle L. Chang	Member	313881	2017	\$400	6	\$2,400
TaraZabehi	Member	314706	2017	\$400	2.75	\$1,100
Melissa A. Huether	Member	316604	2017	\$400	8.50	\$3,400
TOTAL:					713.30	\$358,037.50

7. Although an award of attorneys' fees based on a percentage of the fund is appropriate in the settlement of this matter, it should be noted that Class Counsel's request for attorneys' fees is also justified under a simple lodestar analysis. Based on the hours of work performed by Lawyers for Justice, PC, the total lodestar fees are \$358,037.50, utilizing the above-listed reasonable hourly rates of compensation for attorneys at the firm.

8. Per the Court's instruction, a revised proposed order and judgment has been prepared which reflects the names of those Class Members who opted out of the Settlement. The revised proposed order and judgment also reflects adjustments to the distribution of funds from uncashed settlement checks and associated Settlement Administration Costs.

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SUPPLEMENTAL DECLARATION OF EDWIN AIWAZIAN IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, ATTORNEYS' FEES, COSTS, AND SERVICE PAYMENTS

EXHIBIT A

SUPERIOR COURT OF CALIFORNIA,
COUNTY OF ORANGE
CIVIL COMPLEX CENTER

MINUTE ORDER

DATE: 03/15/2019

TIME: 09:00:00 AM

DEPT: CX104

JUDICIAL OFFICER PRESIDING: William Claster

CLERK: Gus Hernandez

REPORTER/ERM: None

BAILIFF/COURT ATTENDANT: Barbara Allen

CASE NO: 30-2016-00828352-CU-OE-CXC CASE INIT.DATE: 01/05/2016

CASE TITLE: Campos vs. Motive Energy, Inc.

CASE CATEGORY: Civil - Unlimited CASE TYPE: Other employment

EVENT ID/DOCUMENT ID: 72931159

EVENT TYPE: Final Fairness Hearing

MOVING PARTY: Jaunita Hernandez, William Campos

CAUSAL DOCUMENT/DATE FILED: Motion - Other for Final Approval of Class Action, 02/21/2019

APPEARANCES

Plaintiff's Motion for Final Approval of Class Action Settlement

There are no appearances by any party.

Tentative Ruling posted on the Internet .

All parties telephonically submit on the Court's tentative ruling.

The Court confirms the tentative ruling as follows:

The hearing on the motion for final approval of class action settlement is **CONTINUED** to May 10, 2019 at 9:00 a.m. for further evidence regarding the following:

- 1. Please provide an updated declaration addressing whether any additional class members objected to the settlement and how many opted out. The March 2 deadline to object or opt-out had not yet expired as of the date the administrator signed and filed her declaration on 2/21/19, (Kline Decl., ¶8.) Also, there are an additional 19 members of the class to whom class packets were returned undeliverable and had to be re-mailed. (Kline Decl., ¶ 9.) It is not clear when the deadline to object or opt-out for these individuals expires, so the Court set the continued hearing date far enough out on the assumption that the time period will have elapsed by the next hearing date.

- 2. Provide the names of the class members who opted out in the administrator's supplemental declaration and revise the Proposed Judgment to identify by name the class members who opted-out.

- 3. The Court will defer approving the settlement and the distributions requested thereunder pending

receipt of the updated evidence and consideration of any timely objections that may be made by the class members to whom packets were re-mailed.

- 4. As to the request for attorneys' fees, the evidence submitted in support of the request is entirely insufficient to enable the Court to perform a lodestar cross-check to aid in its determination of the overall reasonableness of the attorneys' fees requested. Exhibit B to Mr. Aiwarzian's Declaration does not identify which attorneys at his firm performed what categories of work set forth on the chart, how much time each person spent on each such task, and Mr. Aiwarzian does not provide any information from which a billing value can be assigned to each attorney's time, including their level of seniority and experience, and the reasonable and customary billing rates for their level of seniority, experience in this geographic region applicable to this type of litigation. This is basic and routine information this Court expects to see in support of a request for attorneys' fees — particularly where counsel has been working on this case for three years and represents that his firm has spent over 713 hours working on the case. Mr. Aiwarzian's statement that it is reasonable to apply a rate of \$500 per hour for "[all] work performed by members of Lawyers for Justice, PC" is conclusory and unacceptable. Is Mr. Aiwarzian the only attorney who performed work on this matter and, if not, on what is that assertion based?

- 5. Paragraph 54 of the settlement agreement will need to be amended once more in light of the Court's understanding that the DIR is no longer accepting unclaimed payments into its Unclaimed Wage Fund. An alternative proposed in other cases (and an alternative that is the Court's preference) is for these unclaimed funds to be deposited in the employee's name in the Unclaimed Property Fund maintained by the State Controller's office.

Court orders clerk to serve a copy of this Minute Order upon counsel.

EXHIBIT B

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Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
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Attorneys for Defendants

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

WILLIAM CAMPOS; individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;
JUANITA HERNANDEZ; individually, and
on behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiffs,

vs.

MOTIVE ENERGY, INC., a California
corporation; MOTIVE ENERGY
TELECOMMUNICATIONS GROUP, INC.,
a California corporation; ADVANCED
CHARGING TECHNOLOGIES, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 30-2016-00828352-CU-OE-CXC

Honorable William D. Claster
Department CX104

CLASS ACTION

**AMENDMENT NO. 3 TO JOINT
STIPULATION OF CLASS ACTION AND
PAGA SETTLEMENT AND RELEASE**

Complaint Filed: January 5, 2016
FAC Filed: September 22, 2016
SAC Filed: December 6, 2016
Trial Date: None Set

Plaintiffs William Campos and Juanita Hernandez ("Plaintiffs" or "Class Representatives"), on behalf of themselves, other members of the general public similarly situated, and other aggrieved employees pursuant to the California Private Attorneys General Act, and Defendants Motive Energy, Inc., Motive Energy Telecommunications Group, Inc., and Advanced Charging Technologies, Inc. ("Defendants"), pursuant to Paragraph 72 of the Joint Stipulation of Class Action and PAGA Settlement and Release ("Original Agreement") as amended by Amendment No. 1 to the Joint Stipulation of Class Action and PAGA Settlement and Release ("Amendment No. 1") and Amendment No. 2 to Joint Stipulation of Class Action and PAGA Settlement and Release ("Amendment No. 2") (collectively, "Agreement"), hereby agree to amend and supplant the Agreement to the extent stated herein, and the amendments stated herein are incorporated in the Agreement by this reference:

Paragraph A of Amendment No. 2 (amending Paragraph E of Amendment No. 1 and Paragraph 54 of the Original Agreement) is hereby amended to state as follows:

Individual Settlement Payment checks issued to Settlement Class Members will remain negotiable for one hundred and eighty (180) calendar days, and will be cancelled if not cashed or deposited within the 180-day period. Funds associated with Individual Settlement Payment checks that have not been cashed or deposited within this timeframe will be remitted to the Unclaimed Property Fund maintained by the State Controller's Office in the names of the Settlement Class Members whose checks are cancelled.

THE PARTIES HAVE AGREED TO AMENDMENT OF THE AGREEMENT AS STATED HEREIN, BY AND THROUGH THEIR UNDERSIGNED COUNSEL.

Dated: April 30, 2019

LAWYERS for JUSTICE, PC

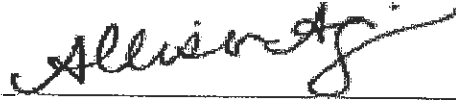

Edwin Aiwazian
Joanna Ghosh
Attorneys for Plaintiffs and the Class

///

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410 West Arden Avenue, Suite 203
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1 Dated: April 9, 2019

MICHELMAN & ROBINSON, LLP



Mona Z. Hanna

Marc R. Jacobs

Amanda K. Pawlyk

Allison Aguirre

Attorneys for Defendants

EXHIBIT C

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Attorneys for Defendants

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

WILLIAM CAMPOS; individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;
JUANITA HERNANDEZ; individually, and
on behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiffs,

vs.

MOTIVE ENERGY, INC., a California
corporation; MOTIVE ENERGY
TELECOMMUNICATIONS GROUP, INC.,
a California corporation; ADVANCED
CHARGING TECHNOLOGIES, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 30-2016-00828352-CU-OE-CXC

Honorable William D. Cluster
Department CX104

CLASS ACTION

**AMENDMENT NO. 3 TO JOINT
STIPULATION OF CLASS ACTION AND
PAGA SETTLEMENT AND RELEASE**

Complaint Filed: January 5, 2016
FAC Filed: September 22, 2016
SAC Filed: December 6, 2016
Trial Date: None Set

1 Plaintiffs William Campos and Juanita Hernandez ("Plaintiffs" or "Class Representatives"), on
2 behalf of themselves, other members of the general public similarly situated, and other aggrieved
3 employees pursuant to the California Private Attorneys General Act, and Defendants Motive Energy,
4 Inc., Motive Energy Telecommunications Group, Inc., and Advanced Charging Technologies, Inc.
5 ("Defendants"), pursuant to Paragraph 72 of the Joint Stipulation of Class Action and PAGA
6 Settlement and Release ("Original Agreement") as amended by Amendment No. 1 to the Joint
7 Stipulation of Class Action and PAGA Settlement and Release ("Amendment No. 1") and
8 Amendment No. 2 to Joint Stipulation of Class Action and PAGA Settlement and Release
9 ("Amendment No. 2") (collectively, "Agreement"), hereby agree to amend and supplant the
10 Agreement to the extent stated herein, and the amendments stated herein are incorporated in the
11 Agreement by this reference:

12 **Paragraph A of Amendment No. 2 (amending Paragraph E of Amendment No. 1 and**
13 **Paragraph 54 of the Original Agreement) is hereby amended to state as follows:**

14 Individual Settlement Payment checks issued to Settlement Class Members will
15 remain negotiable for one hundred and eighty (180) calendar days, and will be
16 cancelled if not cashed or deposited within the 180-day period. Funds associated
17 with Individual Settlement Payment checks that have not been cashed or deposited
18 within this timeframe will be remitted to the California Department of Industrial
19 Relations' Unclaimed Wage Property Fund maintained by the State Controller's
20 Office in the names of the Settlement Class Members whose checks are cancelled.

21 **THE PARTIES HAVE AGREED TO AMENDMENT OF THE AGREEMENT AS STATED**
22 **HEREIN, BY AND THROUGH THEIR UNDERSIGNED COUNSEL.**

23
24 Dated: April ____, 2019

LAWYERS for JUSTICE, PC

25
26 _____
27 Edwin Aiwanian
28 Joanna Ghosh
Attorneys for Plaintiffs and the Class

///

1 Dated: April ____, 2019

MICHELMAN & ROBINSON, LLP

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4 Mona Z. Hanna
5 Marc R. Jacobs
6 Amanda K. Pawlyk
7 Allison Aguirre
8 *Attorneys for* Defendants
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EXHIBIT D

CAMPOS, ET AL. V. MOTIVE ENERGY INC., ET AL.
(ORANGE COUNTY SUPERIOR COURT CASE NO. 30-2016-00828352-CU-OE-CXC)
ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on 1) Class Certification Elements, including Adequacy, Typicality, Superiority and Commonality; 2) Merits of Plaintiff William Campos' Claims and the Merits of the Claims of the Putative Class Members; and 3) Potential Damages Exposure of Defendants Motive Energy, Inc., Motive Energy Telecommunications Group, Inc., and Advanced Charging Technologies, Inc. ("Defendants") with respect to the Damages Sustained by Plaintiff Campos and the Putative Class • Edwin Aiwazian	11
Pre-Lawsuit Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, and Certification Decisions in California, Including all New Relevant DLSE Materials • Edwin Aiwazian – 5 hours • Arby Aiwazian – 2 hours	7
Investigation of Defendants, Defendants' Business Relationships, and the Industry in which Defendants Operate • Edwin Aiwazian	5
Investigation of Defendants' Organizational and Corporate Structure and Executive Reporting Structure as It Related to the Employment and Management of the Putative Class Members • Edwin Aiwazian	4

Research and Investigation Re: Staffing Models and Staffing Levels at Defendants' Locations and Worked by Putative Class Members Throughout California	2
• Edwin Aiwarzian	
Research and Investigation Re: Defendants' Policies, Practices, and Procedures Relating to Rounding, Reporting Time, Timekeeping, Meal/Rest Breaks, Overtime Compensation, and Reimbursement of Business-Related Expenses	5
• Edwin Aiwarzian	
Meet and Communicate with Plaintiff William Campos Throughout the Pendency of the Case	32
• Edwin Aiwarzian – 14.25 hours • Arby Aiwarzian – 7.50 hours • Joanna Ghosh – 4 hours • Elizabeth Parker-Fawley – 3 hours • Danielle L. Chang – 0.50 hours • Tiffany J. Hyun – 1 hour • Tara Zabehi – 1.75 hours	
Meet and Communicate with Plaintiff Juanita Hernandez Throughout the Pendency of the Case	24
• Edwin Aiwarzian – 11 hours • Arby Aiwarzian – 4 hours • Joanna Ghosh – 3.25 hours • Elizabeth Parker-Fawley – 3.75 hours • Tiffany J. Hyun – 1 hour • Tara Zabehi – 1 hour	

Pleadings and Court Filings	
Research and Draft Plaintiff Campos' Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on January 5, 2016) • Edwin Aiwazian	6.25
Review Court's Notice of Case Assignment (filed on January 5, 2016) • Edwin Aiwazian	0.10
Review Court's Order Scheduling Case Management Conference (filed on February 18, 2016) • Edwin Aiwazian	0.10
Draft Plaintiff Campos' Case Management Statement (filed on March 25, 2016) • Edwin Aiwazian	2.25
Draft Plaintiff Campos' Notice of Case Management Conference (filed on March 29, 2016) • Julia McGuinness	0.50
Review and Analyze Defendants' Answer to Plaintiff Campos' Class Action Complaint and Research Affirmative Defenses in Defendants' Answer (served on April 26, 2016) • Edwin Aiwazian	3
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Statement (filed on May 24, 2016) • Edwin Aiwazian	2.25
Review Court's Order Regarding Case Management Conference (filed on June 1, 2016) • Edwin Aiwazian	0.10

Draft Plaintiff Campos' Notice Regarding Case Management Conference Hearing (filed on June 1, 2016) • Arby Aiwarzian	0.50
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Statement (filed on September 22, 2016) • Elizabeth Parker-Fawley	2
Draft Plaintiffs' First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Claims Involved (filed on September 22, 2016) • Edwin Aiwarzian	3.50
Review Defendants' Notice of Ruling (served on September 27, 2016) • Arby Aiwarzian	0.10
Draft Plaintiffs' Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on December 2, 2016) • Edwin Aiwarzian	2
Meet and Confer with Defendants' Counsel, Draft Joint Stipulation and [Proposed] Order Granting Plaintiffs Leave to File [Proposed] Second Amended Complaint (submitted on November 17, 2016), and Review Court's Order Granting Plaintiffs Leave to File Second Amended Complaint (filed on November 28, 2016) • Elizabeth Parker-Fawley	1.75
Prepare Notice of Entry of Judgment or Order (filed on December 2, 2016) • Edwin Aiwarzian	0.10

Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Statement (filed on December 19, 2016) • Elizabeth Parker-Fawley	1.75
Review Court's Order Regarding Status Conference (filed on January 3, 2017) • Elizabeth Parker-Fawley	0.10
Draft Plaintiffs' Notice of Ruling at Further Status Conference (filed on January 4, 2017) • Elizabeth Parker-Fawley	0.25
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and [Proposed] Order Continuing Hearing Date of Plaintiff Campos' Motion to Compel Further Deposition of Defendant Motive Energy Telecommunications Group, Inc.'s Person Most Knowledgeable and Production of Documents at Deposition and Request for Sanctions (submitted on January 27, 2017) • Elizabeth Parker-Fawley	1.50
Meet and Confer with Defendants' Counsel, Draft Amended Joint Stipulation and [Proposed] Order Continuing Hearing Date of Plaintiff Campos' Motion to Compel Further Deposition of Defendant Motive Energy Telecommunications Group, Inc.'s Person Most Knowledgeable and Production of Documents at Deposition and Request for Sanctions (submitted on February 3, 2017), and Review Court's Order Continuing Hearing Date of Plaintiff Campos' Motion to Compel (filed on February 3, 2017) • Elizabeth Parker-Fawley	0.50
Review and Analyze Defendants' Answer to Plaintiffs' Second Amended Class Action Complaint and Research Affirmative Defenses in Defendants' Answer (served on March 20, 2017) • Edwin Aiwarzian	1.75

Draft Plaintiff Campos's Notice of Withdrawal of Motion to Compel Further Deposition of Defendant Motive Energy Telecommunications Group, Inc.'s Person Most Knowledgeable and Production of Documents at Deposition and Request for Sanctions (filed on March 23, 2017) • Elizabeth Parker-Fawley	0.25
Meet and Confer with Defendants' Counsel, Draft Joint Stipulation and [Proposed] Order Granting Defendants' Leave to File First Amended Answer (submitted on April 6, 2017), and Review Court's Order Granting Defendants' Leave to File First Amended Answer (filed on April 6, 2017) • Edwin Aiwarzian	1.50
Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Statement (filed on April 26, 2017) • Edwin Aiwarzian	1.75
Review Court's Order Regarding Status Conference (filed on April 3, 2017) • Edwin Aiwarzian	0.10
Draft Plaintiffs' Notice Regarding May 3, 2017 Status Conference (filed on April 3, 2017) • Stephanie S. Ponck	0.50
Review and Analyze Defendants' First Amended Answer to Plaintiffs' Second Amended Class Action Complaint and Research Affirmative Defenses in Defendants' Answer (served on April 8, 2017) • Edwin Aiwarzian	1.50
Draft Plaintiffs' Discovery Status Conference Statement (filed on May 19, 2017) • Elizabeth Parker-Fawley	3

Review Defendants' Statement Regarding Discovery of Putative Class Contact Information and Time and Wage Records (served on May 19, 2017) • Elizabeth Parker-Fawley	0.75
Review Court's Order Regarding Status Conference (filed on May 30, 2017) • Edwin Aiwanian	0.10
Draft Plaintiffs' Notice of Ruling at Status Conference (filed on June 29, 2017) • Elizabeth Parker-Fawley	0.50
Review Defendants' Status Conference Statement (served on June 28, 2017) • Elizabeth Parker-Fawley	0.25
Draft Plaintiffs' Discovery Status Conference Statement (filed on June 29, 2017) • Elizabeth Parker-Fawley	1.25
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulated Protective Order Concerning Discovery and Confidential Information; And [Proposed] Order Thereon (submitted on July 6, 2017) • Edwin Aiwanian – 2 hours • Elizabeth Parker-Fawley – 1 hour	3
Review Court's Order Regarding Status Conference (filed on July 6, 2017) • Edwin Aiwanian	0.10
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and [Proposed] Order Regarding Discovery (submitted on July 21, 2017), and Review Court's Order Regarding Discovery (filed on July 24, 2017) • Elizabeth Parker-Fawley	1.75

• Prepare Notice of Entry of Judgment or Order (filed on July 25, 2017) • Edwin Aiwarzian	0.10
• Review Defendant' Substitution of Attorney (filed on October 10, 2017) • Edwin Aiwarzian	0.10
• Meet and Confer with Defendants' Counsel, and Draft Joint Case Management Statement and Stipulation to Continue Case Management Conference and [Proposed] Order Re: Joint Status Conference Statement and Stipulation to Continue November 7, 2017 Status Conference (submitted on October 31, 2017) • Edwin Aiwarzian	1.50
• Meet and Confer with Defendants' Counsel, Draft Joint Case Management Statement and Stipulation to Continue Case Management Conference and [Proposed] Order Re: Joint Status Conference Statement and Stipulation to Continue Case Management Conference (submitted on February 21, 2018), and Review Court's Order Continuing Status Conference (filed on February 22, 2018) • Edwin Aiwarzian	1
• Meet and Confer with Defendants' Counsel, Draft Joint Case Management Statement and Stipulation to Continue Case Management Conference and [Proposed] Order Re: Joint Status Conference Statement and Stipulation to Continue Case Management Conference (submitted on May 10, 2018), and Review Court's Order Continuing Status Conference (filed on May 10, 2018) • Edwin Aiwarzian	1
• Meet and Confer with Defendants' Counsel, Draft Joint Case Management Statement and Stipulation to Continue Case Management Conference and [Proposed] Order Re: Joint Status Conference Statement and Stipulation to Continue Case Management Conference (submitted on July 12, 2018) • Edwin Aiwarzian	0.75
• Review Court's Order Regarding Status Conference (filed on July 16, 2018) • Edwin Aiwarzian	0.10

Review Court's Order Regarding Status Conference (filed on July 31, 2018)	0.10
Edwin Aiwarzian	
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement; and [Proposed] Order Thereon (submitted on September 14, 2018); and Review Court's Order Continuing Deadline to File Supplemental Papers in Support of Motion for Preliminary Approval of Class Action Settlement (filed on September 17, 2018)	0.75
Joanna Ghosh	
Review Court's Minute Order Regarding Motion for Preliminary Approval (filed on October 22, 2018)	0.10
Joanna Ghosh	
Prepare Notice of Entry of Judgment or Order (filed on November 28, 2018)	0.10
Edwin Aiwarzian	
Appearances	
Prepare for and Attend Case Management Conference via CourtCall (March 28, 2016)	1.25
Julia McGuinness	
Prepare for, Travel to/from, and Attend Case Management Conference (June 1, 2016)	3.75
Arby Aiwarzian	
Prepare for, Travel to/from, and Attend Motion to Compel and Status Conference (September 23, 2016)	4
Arby Aiwarzian	
Prepare for, Travel to/from, and Attend Status Conference (January 3, 2017)	4
Elizabeth Parker-Fawley	

• Stephanie S. Ponck	2
• Elizabeth Parker-Fawley	4
• Elizabeth Parker-Fawley	4.50
• Elizabeth Parker-Fawley	5
• Melissa A. Huether	1
• Melissa A. Huether	0.50
• Arby Aiwazian	4
Discovery and Deposition	
• Edwin Aiwazian	0.25

Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Campos (served on October 22, 2015) • Edwin Aiwazian	1.50
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Hernandez (served on April 20, 2016) • Edwin Aiwazian	0.10
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Hernandez (served on May 14, 2016 and May 25, 2016) • Arby Aiwazian	2.50
Review and Analyze Defendant Motive Energy, Inc.'s Form Interrogatories – Employment Law (Set One), Form Interrogatories – General (Set One), Special Interrogatories (Set One), Requests for Admission (Set One), and Requests for Production of Documents (Set One) to Plaintiff Campos; and Draft Plaintiff Campos' Responses to Defendant Motive Energy Inc.'s Form Interrogatories – Employment Law (Set One), Responses to Form Interrogatories – General (Set One), Responses to Special Interrogatories (Set One), Responses to Requests for Admission (Set One), and Responses to Requests for Production of Documents (Set One) (served on June 20, 2016) • Edwin Aiwazian – 5.50 hours • Jill J. Parker – 9.50 hours	15
Draft Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy, Inc. and Requests for Production of Documents (August 1, 2016; Organizational Structure), Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy, Inc. and Requests for Production of Documents (August 2, 2016; Job Duties), and Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy, Inc. and Requests for Production of Documents (August 3, 2016; Affirmative Defenses) (served on July 5, 2016) • Edwin Aiwazian – 3.50 hours • Elizabeth Parker-Fawley – 8.50 hours	12

Draft Plaintiff Campos' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant Motive Energy, Inc. (served on July 5, 2016) • Edwin Aiwanian – 5.25 hours • Elizabeth Parker-Fawley – 13.75 hours	19
Draft Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (August 4, 2016; Organizational Structure), Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (August 5, 2016; Job Duties), and Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (August 8, 2016; Affirmative Defenses) (served on July 5, 2016) • Elizabeth Parker-Fawley	1
Draft Plaintiff Campos' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant Motive Energy Telecommunications Group, Inc. (served on July 5, 2016) • Elizabeth Parker-Fawley	2.50
Draft Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (August 9, 2016; Organizational Structure), Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (August 10, 2016; Job Duties), and Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (August 11, 2016; Affirmative Defenses) (served on July 5, 2016) • Elizabeth Parker-Fawley	1

Draft Plaintiff Campos' Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant Advanced Charging Technologies, Inc. (served on July 5, 2016) • Elizabeth Parker-Fawley	2
Draft Plaintiff Campos' Amended Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (October 11, 2016; Organizational Structure) and Amended Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (October 12, 2016; Job Duties) (served on July 5, 2016) • Elizabeth Parker-Fawley	0.75
Review and Analyze Defendant Motive Energy, Inc.'s Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy, Inc. and Requests for Production of Documents (August 1, 2016; Organizational Structure), Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy, Inc. and Requests for Production of Documents (August 2, 2016; Job Duties), and Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant and Request for Production of Documents (August 3, 2016; Affirmative Defenses) (served on July 26, 2016) • Edwin Aiwarzian	3.50
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (August 4, 2016; Organizational Structure), Objection to Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (August 5, 2016; Job Duties), and Objection to Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (August 8, 2016; Affirmative Defenses) (served on July 28, 2016) • Edwin Aiwarzian	2

Review and Analyze Defendant Advanced Charging Technologies, Inc.'s Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (August 9, 2016; Organizational Structure), Objection to Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (August 10, 2016; Job Duties), and Objection to Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (August 11, 2016; Affirmative Defenses) (served on August 1, 2016) • Edwin Aiwarzian	2
Review and Analyze Defendant Motive Energy, Inc.'s Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Responses to Special Interrogatories (Set One), Responses to Special Interrogatories (Set Two), Responses to Special Interrogatories (Set Three), Responses to Requests for Production of Documents (Set One), and Responses to Requests for Production of Documents (Set Two) to Defendant Advanced Charging Technologies, Inc. (served on August 9, 2016) • Edwin Aiwarzian – 5.50 hours • Elizabeth Parker-Fawley – 9 hours • Arya Djafroudi – 9.50 hours	24
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Responses to Special Interrogatories (Set One), Responses to Special Interrogatories (Set Two), Responses to Special Interrogatories (Set Three), Responses to Requests for Production of Documents (Set One), and Responses to Requests for Production of Documents (Set Two) to Defendant Advanced Charging Technologies, Inc. (served on August 9, 2016) • Edwin Aiwarzian – 4 hours • Elizabeth Parker-Fawley – 3.25 hours • Arya Djafroudi – 6.75 hours	14

Review and Analyze Defendant Advanced Charging Technologies, Inc.'s Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Responses to Special Interrogatories (Set One), Responses to Special Interrogatories (Set Two), Responses to Special Interrogatories (Set Three), Responses to Requests for Production of Documents (Set One), and Responses to Requests for Production of Documents (Set Two) to Defendant Advanced Charging Technologies, Inc. (served on August 9, 2016) • Edwin Aiwarzian – 1 hour • Elizabeth Parker-Fawley – 1.50 hours • Arya Djafroudi – 3.25 hours	5.75
Draft Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (September 7, 2016; Organizational Structure and Job Duties) and Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (September 8, 2016; Job Duties) (served on August 29, 2016) • Elizabeth Parker-Fawley	1
Review and Analyze Defendant's Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (September 7, 2016; Organizational Structure and Job Duties) and Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (September 8, 2016; Job Duties) (served on September 1, 2016) • Edwin Aiwarzian – 0.50 hours • Elizabeth Parker-Fawley – 1 hour	1.50
Draft Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (October 11, 2016; Organizational Structure and Job Duties) and Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (October 12, 2016; Job Duties) (served on September 19, 2016) • Elizabeth Parker-Fawley	0.25

Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (October 11, 2016; Organizational Structure and Job Duties) and Objection to Plaintiff Campos' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (October 12, 2016; Job Duties) (served on September 26, 2016) • Elizabeth Parker-Fawley	0.50
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Form Interrogatories – General (Set One), Special Interrogatories (Set One), Requests for Admission (Set One), and Requests for Production of Documents (Set One) to Plaintiff Campos (served on August 22, 2016); and Draft Plaintiff Campos's Responses to Defendant Motive Energy Telecommunications Group, Inc.'s Form Interrogatories – General (Set One), Responses to Special Interrogatories (Set One), Responses to Requests for Admission (Set One), and Responses to Requests for Production of Documents (Set One) (served on September 26, 2016) • Edwin Aiwarzian – 6.75 hours • Elizabeth Parker-Fawley – 11.25 hours	18
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Notice of Taking Deposition of Plaintiff William Campos and Request for Production of Documents (served on September 21, 2016); and Draft Plaintiff Campos' Objections to Defendant Motive Energy Telecommunications Group, Inc.'s Notice of Taking Deposition of William Campos and Request for Production of Documents (served on September 29, 2016) • Edwin Aiwarzian – 2 hours • Elizabeth Parker-Fawley – 3.50 hours	5.50

Draft Plaintiff Campos' Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (November 8, 2016; Organizational Structure and Job Duties) and Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (November 9, 2016; Job Duties) (served on October 4, 2016) • Elizabeth Parker-Fawley	0.25
Draft Plaintiff Campos' Supplemental Responses to Defendant Motive Energy Telecommunications Group, Inc.'s Form Interrogatories – General (Set One) (served on October 10, 2016) • Edwin Aiwarzian – 1.50 hours • Elizabeth Parker-Fawley – 2.25 hours	3.75
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Objection to Plaintiff Campos' Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (November 8, 2016; Organizational Structure and Job Duties) and Objection to Second Amended Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (November 9, 2016; Job Duties) (served on October 31, 2016) • Edwin Aiwarzian	0.50
Review Defendant Motive Energy Telecommunications Group, Inc.'s Amended Notice of Taking Deposition of Plaintiff William Campos and Requests for Production of Documents (served on October 31, 2016) • Edwin Aiwarzian	0.50
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Production of Documents (Set One) (Bates Nos. METG0001-METG0124) (served on November 4, 2016) • Edwin Aiwarzian	2

Review and Analyze Defendant Motive Energy, Inc.'s Form Interrogatories – General (Set One), Form Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), Requests for Admission (Set One), and Requests for Production of Documents (Set One) to Plaintiff Hernandez (served on September 23, 2016); and Draft Plaintiff Hernandez's Response to Defendant Motive Energy, Inc.'s Form Interrogatories – General (Set One), Response to Form Interrogatories – Employment Law (Set One), Response to Special Interrogatories (Set One), Response to Request for Admission (Set One), and Response to Requests for Production of Documents (Set One) (served on November 7, 2016) • Edwin Aiwazian – 5.50 hours • Elizabeth Parker-Fawley – 12.50 hours	18
Prepare for and Attend the Deposition of Person Most Knowledgeable Daniel Ponzo (November 8, 2016; Glendale, California) and Review Deposition Transcript • Edwin Aiwazian – 1 hour • Arya Djafroudi – 8.75 hours	9.75
Prepare for and Attend the Deposition of Person Most Knowledgeable Jason McCombie (November 9, 2016; Glendale, California) and Review Deposition Transcript • Edwin Aiwazian – 0.75 hours • Elizabeth Parker-Fawley – 6 hours	6.75
Prepare for and Attend the Deposition of Person Most Knowledgeable Daniel Ponzo (November 9, 2016; Glendale, California) and Review Deposition Transcript • Edwin Aiwazian – 0.50 hours • Elizabeth Parker-Fawley – 6 hours	6.50
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Supplemental Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Supplemental Responses to Plaintiff's Special Interrogatories (Set Two), and Supplemental Responses to Plaintiff Campos' Requests for Production of Documents (Set One) (served on December 16, 2016) • Arya Djafroudi	3

Draft Plaintiff Campos's Supplemental Responses to Defendant Motive Energy Telecommunications Group, Inc.'s Form Interrogatories – General (Set One), Supplemental Responses to Special Interrogatories (Set One), and Supplemental Responses to Requests for Production of Documents (Set One) (served on December 21, 2016) • Elizabeth Parker-Fawley	2
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Second Amended Notice of Taking Deposition of Plaintiff Campos and Requests for Production of Documents (served on December 14, 2016); and Draft Plaintiff Campos' Objections to Defendant Motive Energy Telecommunications Group, Inc.'s Second Amended Notice of Taking Deposition of Campos and Request for Production of Documents (served on January 10, 2017) • Edwin Aiwarzian – 2.25 hours • Elizabeth Parker-Fawley – 6 hours	8.25
Draft Plaintiff Hernandez's Supplemental Responses to Defendant Motive Energy, Inc.'s Form Interrogatories – Employment Law (Set One) and Supplemental Responses to Defendant Motive Energy, Inc.'s Special Interrogatories (Set One) (served on January 10, 2017) • Elizabeth Parker-Fawley	2.25
Review and Analyze Defendant Motive Energy, Inc.'s Notice of Taking Deposition of Plaintiff Hernandez and Requests for Production of Documents (served on December 14, 2016), and Draft Plaintiff Hernandez's Objections to Defendant Motive Energy, Inc.'s Notice of Taking Deposition of Plaintiff Hernandez and Request for Production of Documents (served on January 10, 2017) • Edwin Aiwarzian – 1.50 hour • Elizabeth Parker-Fawley – 6.50 hours	8
Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Juanita Hernandez (January 12, 2017; Costa Mesa, California) and Review Deposition Transcript • Edwin Aiwarzian – 2 hours • Arby Aiwarzian – 12 hours	14

Prepare for, Travel to/from, and Defend the Deposition of Plaintiff William Campos (January 13, 2017; Costa Mesa, California) and Review Deposition Transcript • Edwin Aiwazian – 3 hours • Arya Djafroudi – 12.50 hours	15.50
Review and Analyze Defendant Motive Energy, Inc.'s Supplemental Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Supplemental Responses to Plaintiff Campos' Special Interrogatories (Set Two), and Supplemental Responses to Plaintiff Campos' Requests for Production of Documents (Set One) (served on January 13, 2017) • Elizabeth Parker-Fawley	3.50
Draft <i>Belaire-West</i> Administration Notice and Opt-Out Postcard for Defendants Motive Energy, Inc. and Motive Energy Telecommunications Group, Inc. (drafted on September 14, 2016) • Arya Djafroudi	1.50
Draft Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (January 30, 2017; Joint Employer) and Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy, Inc. and Requests for Production of Documents (January 30, 2017; Joint Employer) (served on January 25, 2017) • Elizabeth Parker-Fawley	6
Prepare for and Attend the Deposition of Person Most Knowledgeable Daniel Porzo (January 30, 2017; Glendale, California) and Review Deposition Transcript • Edwin Aiwazian – 1 hour • Arya Djafroudi – 8 hours	9

Draft Plaintiffs' Amended Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (February 6, 2017; Joint Employer) and Plaintiffs' Notice of Continued Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (February 6, 2017; Policies and Procedures) (served on February 2, 2017) • Elizabeth Parker-Fawley	2
Draft Plaintiffs' Amended Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (February 23, 2017; Joint Employer) (served on February 6, 2017) • Elizabeth Parker-Fawley	0.25
Draft Plaintiffs' Notice of Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (February 23, 2017; Joint Employer) (served on February 6, 2017) • Elizabeth Parker-Fawley	0.25
Prepare for and Attend the Depositions of Person Most Knowledgeable Witnesses (Non-Appearences) (February 6, 2017; Glendale, California) • Arya Djafroudi	1.75
Draft Plaintiffs' Amended Notice of Deposition of Person Most Knowledgeable at Defendant Advanced Charging Technologies, Inc. and Requests for Production of Documents (February 28, 2017; Joint Employer) and Notice of Continued Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (February 28, 2017; Policies and Procedures) (served on February 16, 2017) • Elizabeth Parker-Fawley	0.50

Prepare for, Travel to/from, and Attend the Deposition of Person Most Knowledgeable Daniel Ponzo (February 28, 2017; Long Beach, California) and Review Deposition Transcript • Edwin Aiwarzian – 1.50 hours • Arya Djaifroudi – 9 hours	10.50
Draft Plaintiffs' Re-Notice of Continued Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (March 22, 2017; Organizational Structure) (served on March 8, 2017) • Elizabeth Parker-Fawley	0.25
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Objections to Plaintiffs' Re-Notice of Continued Deposition of Person Most Knowledgeable at Defendant Motive Energy Telecommunications Group, Inc. and Requests for Production of Documents (March 22, 2017; Organizational Structure) (served on March 16, 2017) • Elizabeth Parker-Fawley	2
Prepare for and Attend the Deposition of Person Most Knowledgeable Daniel Ponzo (March 22, 2017; Glendale, California) and Review Deposition Transcript • Edwin Aiwarzian – 1 hour • Elizabeth Parker-Fawley – 8.75 hours	9.75
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Notice of Taking Continued Deposition of Plaintiff Juanita Hernandez and Requests for Production of Documents (served on March 15, 2017); and Draft Plaintiff Hernandez's Objections to Defendant Motive Energy Telecommunications Group, Inc.'s Notice of Taking Continued Deposition of Plaintiff Hernandez and Requests for Production of Documents (served on March 28, 2017) • Edwin Aiwarzian – 0.75 hours • Elizabeth Parker-Fawley – 8.75 hours	9.50

Prepare for, Travel to/from, and Defend the Deposition of Plaintiff Juanita Hernandez (March 31, 2017; Costa Mesa, California) and Review Deposition Transcript • Edwin Aiwanian – 2 hours • Elizabeth Parker-Fawley – 12.75 hours	14.75
Draft Plaintiff Hernandez's Further Supplemental Responses to Defendant Motive Energy, Inc.'s Special Interrogatories (Set One) (served on May 2, 2017) • Elizabeth Parker-Fawley	2
Review and Analyze Defendant Motive Energy, Inc.'s Supplemental Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Supplemental Responses to Plaintiff Campos' Special Interrogatories (Set Two), and Supplemental Responses to Plaintiff Campos' Requests for Production of Documents (Set One) (served on May 31, 2017) • Elizabeth Parker-Fawley	5
Review and Analyze Defendant Motive Energy Telecommunications Group, Inc.'s Supplemental Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Supplemental Responses to Plaintiff Campos' Special Interrogatories (Set Two), and Supplemental Responses to Plaintiff Campos' Requests for Production of Documents (Set One) (served on May 31, 2017) • Elizabeth Parker-Fawley – 1 hour • Arya Djafroudi – 1 hour	2
Review and Analyze Defendant Advanced Charging Technologies, Inc.'s Supplemental Responses to Plaintiff Campos' Form Interrogatories – General (Set One), Supplemental Responses to Plaintiff Campos' Special Interrogatories (Set Two), and Supplemental Responses to Plaintiff Campos' Requests for Production of Documents (Set One) (served on May 31, 2017) • Elizabeth Parker-Fawley – 0.50 hours • Arya Djafroudi – 0.75 hours	1.25

Review and Analyze Documents Produced by Defendant Motive Energy Telecommunications Group, Inc. (Bates Nos. METG0125-0244) (served on January 24, 2017; January 27, 2017; March 21, 2017; and June 1, 2017) • Edwin Aiwazian	1.75
Review and Analyze Documents Produced by Defendant Advanced Charging Technologies, Inc. (Bates Nos. ACT0001-0081) (served on January 27, 2017 and June 1, 2017) • Edwin Aiwazian	1.25
Review and Analyze Documents Produced by Defendant Motive Energy, Inc. (Bates Nos. MEI0001-0082) (served on January 27, 2017; June 1, 2017; and June 8, 2017) • Edwin Aiwazian	1.25
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Natasha Villalobos (served on August 21, 2017) • Edwin Aiwazian	0.25
Draft Letters to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Lara Maes and Greg Ocfemia (served on August 22, 2017) • Edwin Aiwazian	0.25
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for James Salvador Gollaz Jr. and Freddie Arvizu (served on August 23, 2017) • Edwin Aiwazian	0.10
Review and Analyze Documents Produced by Putative Class Member (produced on August 29, 2017) • Edwin Aiwazian	3

Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Anthony Green (served on August 31, 2017) • Edwin Aiwarzian	0.10
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Jesse Lucero (served on September 7, 2017) • Edwin Aiwarzian	0.10
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Natasha Villalobos (served on September 11, 2017) • Arby Aiwarzian	2
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Freddy Arvizu (served on September 15, 2017) • Arby Aiwarzian	1
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Anthony Green (served on September 21, 2017) • Edwin Aiwarzian	1.25
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Rigoberto Garcia (served on September 27, 2017) • Edwin Aiwarzian	0.10
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Tomas Aparacio (served on September 28, 2017) • Edwin Aiwarzian	0.10

Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Jesse Lucero (served on September 28, 2017) • Arby Aiwazian	1.50
Draft Follow-up Letters to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Greg Ocfemia, James Salvador Gollaz Jr., and Lara Maes (served on October 12, 2017) • Edwin Aiwazian	0.25
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Greg Ocfemia, James Salvador Gollaz Jr., and Lara Maes (served on October 17, 2017) • Arby Aiwazian	7.50
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Rigoberto Garcia (served on October 18, 2017) • Arby Aiwazian	1.25
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Tomas Aparacio (served on October 20, 2017) • Arby Aiwazian	3
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Dave Morgan, Kriek Jones, and Octavio Herrera (served on November 14, 2017) • Edwin Aiwazian	0.25
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Carlos Santiago (served on November 20, 2017) • Edwin Aiwazian	0.10

Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Steven Varni (served on December 28, 2017) • Edwin Aiwarzian	0.10
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Oscar Leon (served on January 19, 2018) • Edwin Aiwarzian	0.10
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Fidel Ramos Jr. (served on January 22, 2018) • Edwin Aiwarzian	0.10
Letters and Correspondence	
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Campos for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on December 1, 2015) • Edwin Aiwarzian	1.50
Draft PAGA Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Hernandez for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on June 3, 2016) • Edwin Aiwarzian	0.25
Meet with Defendants' Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel • Edwin Aiwarzian – 4.25 hours • Joanna Ghosh – 1 hour • Elizabeth Parker-Fawley – 3 hours • Arya Djafroudi – 3.75 hours	12

Mediation/Settlement	
Review and Analyze Mediation Data and Documents Produced by Defendants, Including Employee Handbooks and Policies, Sampling of Employee Time Data, Sampling of Employee Pay Data, and Class-Wide Data Regarding Class Size, Compensation, Workweeks, and Premium Pay (DEFS_MEDIATION000001-005614) (served on January 5, 2018) • Edwin Aiwarzian – 31 hours • Tiffany J. Hyun – 13 hours	44
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Exhibits to the Mediation Brief, and Performing Damages Analysis/Calculations (submitted on January 29, 2018) • Edwin Aiwarzian – 10.75 hours • Tiffany J. Hyun – 3.25 hours	14
Travel to/from and Attend Mediation Session (January 31, 2018; Los Angeles, California) • Tiffany J. Hyun	8
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action and PAGA Settlement and Release (executed on July 10, 2018) and Draft Exhibits • Edwin Aiwarzian – 2.50 hours • Joanna Ghosh – 2 hours	4.50
Law and Motion	
Draft Plaintiff Campos' Notice of Motion and Motion for Leave to File an Amended Complaint, Declaration of Elizabeth M.R. Parker in Support Thereof, and [Proposed] Order Thereon (filed on August 18, 2016) • Elizabeth Parker-Fawley	6

Draft Plaintiff Campos' Notice of Errata (filed on August 24, 2016) • Elizabeth Parker-Fawley	0.25
Review and Analyze Defendants' Opposition to Motion for Leave to File Amended Complaint, Declaration of Nida L. Henderson in Support Thereof, Evidentiary Objections to the Declaration of Elizabeth M.R. Parker, and [Proposed] Order Thereon (served on September 2, 2016); and Draft Plaintiff Campos' Reply in Support of Motion for Leave to File an Amended Complaint (filed on September 9, 2016) • Edwin Aiwanian – 2 hours • Elizabeth Parker-Fawley – 4 hours	6
Review and Analyze Defendant Motive Energy, Inc.'s Motion to Compel Plaintiff William Campos to Further Respond to Form Interrogatories – General and Request for Monetary Sanctions, Declaration of Nida L. Henderson in Support Thereof, Separate Statement Pursuant to C.R.C., Rule 3.1345 in Support Thereof, and [Proposed] Order Thereon (served on August 16, 2016); and Draft Plaintiff Campos' Opposition to Defendant Motive Energy, Inc.'s Motion to Compel Further Responses to Form Interrogatories – General (Set One) and Request for Sanctions and Declaration of Elizabeth M.R. Parker in Support Thereof (filed on September 12, 2016) • Elizabeth Parker-Fawley	11.75
Review and Analyze Defendant Motive Energy, Inc.'s Reply to Plaintiff Campos' Opposition to Motion to Compel Plaintiff to Further Respond to Form Interrogatories – General (served on September 16, 2016) • Elizabeth Parker-Fawley	1.75
Review Court's Order Regarding Defendant Motive Energy, Inc.'s Motion to Compel Plaintiff to Further Respond to Form Interrogatories – General (filed on September 23, 2016) • Edwin Aiwanian	0.10

Draft Plaintiff Campos' Motion to Compel Further Deposition of Defendant Motive Energy Telecommunications Group, Inc.'s person Most Knowledgeable and Production of Documents at Deposition and Request for Sanctions, Declaration of Elizabeth M.R. Parker in Support Thereof, Rule 3.1345 Separate Statement in Support Thereof, and [Proposed] Order Thereon (filed on January 17, 2017) • Elizabeth Parker-Fawley	8
Review and Analyze Defendants' Demurrer to Plaintiffs' Second Amended Complaint, Declaration of N'da L. Henderson Regarding Efforts to Meet and Confer Prior to Filing Demurrer to Second Amended Complaint On Behalf of Defendants, and [Proposed] Order Thereon (served on January 30, 2017); and Draft Plaintiffs' Opposition to Defendants' Demurrer to Plaintiffs' Second Amended Complaint (filed on February 27, 2017) • Elizabeth Parker-Fawley	7.50
Review and Analyze Defendants' Reply to Opposition to Demurrer to Plaintiffs' Second Amended Complaint (filed on March 3, 2017) • Elizabeth Parker-Fawley	2
Review Court's Order on Defendants' Demurrer (filed on March 10, 2017) • Edwin Aiwarzian	0.10

Draft Plaintiffs' Consolidated Motion to Compel Defendants to Provide Further Responses to Plaintiffs' Special Interrogatories (Set One) Nos. 1 and 2 and Request for Monetary Sanctions, Declaration of Arya Djaifroudi in Support Thereof, Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Motive Energy Telecommunications Group, Inc. to Provide Further Responses to Plaintiffs' Special Interrogatories (Set One), Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Motive Energy, Inc. to Provide Further Responses to Plaintiffs' Special Interrogatories (Set One), Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Advanced Charging Technologies, Inc. to Provide Further Responses to Plaintiffs' Special Interrogatories (Set One), and [Proposed] Order in Support Thereof (filed on June 22, 2017) • Arya Djaifroudi	Draft Plaintiffs' Consolidated Motion to Compel Defendants to Provide Further Responses to Plaintiffs' Special Interrogatories (Set Two) and Requests for Production of Documents (Set One) and Request for Monetary Sanctions, Declaration of Arya Djaifroudi in Support Thereof, Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Motive Energy Telecommunications Group, Inc. to Provide Further Responses to Plaintiffs' Special Interrogatories (Set Two), Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Motive Energy, Inc. to Provide Further Responses to Plaintiffs' Special Interrogatories (Set Two); Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Advanced Charging Technologies, Inc. to Provide Further Responses to Plaintiffs' Special Interrogatories (Set Two), Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Motive Energy Telecommunications Group, Inc. to Provide Further Responses to Plaintiffs' Requests for Production (Set One), Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Motive Energy, Inc. to Provide Further Responses to Plaintiffs' Requests for Production (Set One), Rule 3.1345 Separate Statement in Support of Plaintiffs' Consolidated Motion to Compel Defendant Advanced Charging Technologies, Inc. to Provide Further Responses to Plaintiffs' Requests for Production (Set One), and [Proposed] Order Thereon (filed on June 22, 2017) • Edwin Aiwarzian – 2 hours • Arya Djaifroudi – 14 hours
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Draft Plaintiffs' Notice of Errata to the Declarations of Arya Djafroudi in Support of Plaintiffs' Consolidated Motions to Compel Defendants to Provide Further Responses to Discovery and Requests for Monetary Sanctions (filed on June 30, 2017) • Arya Djafroudi	0.50
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwarzian in Support Thereof, Declaration of William Campos in Support Thereof, Declaration of Juanita Hernandez in Support Thereof, and [Proposed] Order (filed on July 27, 2018) • Edwin Aiwarzian – 2.50 hours • Joanna Ghosh – 2.50 hours • Melissa A. Huether – 7 hours	12
Meet and Confer with Defendants' Counsel, and Draft Joint Supplemental Brief in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, Supplemental Declaration of Edwin Aiwarzian in Support Thereof, Declaration of Larry Sneg Regarding Class Notice in Support Thereof, and [Revised Proposed] Order Thereon (filed on September 21, 2018) • Edwin Aiwarzian – 0.50 hours • Joanna Ghosh – 1 hour • Danielle L. Chang – 2.50 hours	4
Draft Plaintiffs' Further Supplemental Declaration of Edwin Aiwarzian in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and [Further Revised Proposed] Order Thereon (filed on November 6, 2018) • Edwin Aiwarzian – 1 hour • Danielle L. Chang – 3 hours	4
Prepare [Further Revised Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on November 15, 2018) • Stephanie S. Ponek	0.75

Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on November 16, 2018) • Edwin Aiwarzian	0.10
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Notice of Motion and Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Service Payments, Declaration of Edwin Aiwarzian in Support Thereof, and [Proposed] Final Approval Order and Judgment (February 21, 2019) • Edwin Aiwarzian – 5 hours • Arby Aiwarzian – 4 hours • Stephanie S. Ponek – 9 hours	18
Total Hours:	713.30