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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

DAVID R. SIERRA, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

NATIONAL RETAIL
TRANSPORTATION, INC., a
Pennsylvania Corporation and DOES 1 -
50, inclusive,

Defendant

Case No.: CIVSB2222831
[Related to Case No.: CIVSB2227785]

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

Date: May 12, 2025
Time: 1:30 p.m.
Judge: Hon. Joseph T. Ortiz
Department: S17

1 **DECLARATION OF KYLE NORDREHAUG IN SUPPORT OF PLAINTIFFS'**

2 **MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT**

3 I, Kyle Nordrehaug, declare:

4 1. I am a partner of the law firm of Blumenthal Nordrehaug Bhowmik De Blouw LLP
5 ("BNBD"), counsel for Plaintiff Keith Haller. As such, I am fully familiar with the facts, pleadings
6 and history of this matter. The following facts are within my own personal knowledge, and if called
7 as a witness, I could testify competently to the matters stated herein.

8 2. This declaration is being submitted in support of the Motion for Final Approval of
9 Class Settlement by Plaintiffs David Sierra and Keith Haller ("Plaintiffs"). The settlement reached
10 between Plaintiffs, individually and on behalf of all members of the Class, on the one hand, and
11 Defendant National Retail Transportation, Inc. ("Defendant"), on the other hand, is set forth in the
12 Settlement Agreement and Stipulation to Resolve Class Action and PAGA Claims ("Settlement
13 Agreement" or "S.A.") submitted with this motion.

14
15 Experience of BNBD

16 3. Over the course of the litigation, my firm has worked actively on this matter. The
17 firm credentials are reflected in the BNBD Resume, a true and correct copy of which is attached
18 hereto as Exhibit #1. Some of the major cases our firm has undertaken are also set forth therein.
19 BNBD has represented hundreds of thousands of employees in hundreds of legal matters, including
20 PAGA lawsuits and hundreds of employment class actions. BNBD's practice is devoted almost
21 entirely to the prosecution of wage and hour class action and PAGA action matters. The attorneys
22 at BNBD have been appointed lead counsel in hundreds of contested motions for class certification
23 including many consolidated wage and hour matters. The attorneys at my firm have extensive
24 experience in cases involving labor code violations and overtime claims. BNBD has litigated
25 similar overtime cases against other employers on behalf of employees, including cases against
26 Walmart, Legoland, Sharp Healthcare, Securitas, Okta, See's Candies, Walt Disney Resorts, El
27 Pollo Loco, Panda Express, Universal Protection, Mattress Firm, Total Renal, Liberty Mutual,

1 Union Bank, Apple, Coventry Health Care, Qualxserv, Union Bank, Marriott, Kaiser / Permanente,
2 Walgreens, and California State Automobile Association. My firm has been approved as class
3 counsel by state and federal courts in California in contested class certification motions, including
4 approvals in this Court. It is this level of experience which enabled the firm to undertake the
5 instant matter and to successfully combat the resources of the defendants and their capable and
6 experienced counsel. On account of the concerted and dedicated effort this case demanded in order
7 to properly handle and prosecute, BNBD was precluded from taking other cases, and in fact, had
8 to turn away other potential fee generating cases.

9 4. Blumenthal Nordrehaug Bhowmik De Blouw LLP was responsible for handling
10 the briefing and argument that resulted in the landmark ruling of *Sakkab v. Luxottica Retail N.*
11 *Am., Inc.*, 803 F.3d 425 (9th Cir. 2015). There, Blumenthal Nordrehaug Bhowmik De Blouw LLP
12 overcame opposition by Littler Mendelson and amici Curiae briefs submitted by Mayer Brown
13 LLP to persuade the Ninth Circuit of the importance of the substantive rights of the State of
14 California under the California Private Attorney General Act of 2004 ("PAGA"). BNBD took the
15 lead on this case where the ruling was the reaffirmation of the PAGA statute and the *Iskanian* rule.
16 BNBD also has recently engaged in noted appellate work on the subject of class actions in the
17 California Court of Appeals resulting in the opinions handed down in *Securitas Sec. Services USA,*
18 *Inc. v. Superior Court*, 234 Cal. App. 4th 1109, 184 Cal. Rptr. 3d 568 (2015) (class or
19 representative action waiver in an employment-related arbitration agreement was unenforceable);
20 *Altman v. Solarcity Corp.*, No. D067582, 2016 Cal. App. Unpub. LEXIS 3536 (Ct. App. May 13,
21 2016) (same). In 2015, Blumenthal Nordrehaug Bhowmik De Blouw LLP received an award from
22 the Daily Journal for Top Appellate Reversal, and I received an award from the Daily Journal as
23 Top Labor & Employment Attorney in 2016.

24 5. District Judge Irma Gonzales in a consolidated class action representing hundreds
25 of armed forces officers held that Blumenthal Nordrehaug Bhowmik De Blouw LLP was "qualified
26 counsel with extensive experience in class action litigation." *McPhail v. First Command Fin.*
27 *Planning, Inc.*, 247 F.R.D. 598, 611 (S.D. Cal. 2007). Examples of other contested actions where
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1 class certification was granted Blumenthal Nordrehaug Bhowmik De Blouw LLP and was
2 appointed lead class counsel in wage and hour class actions in Federal Court include *Schulz v.*
3 *Qualxserv, LLC*, 2012 U.S. Dist. LEXIS 58561 (S.D. Cal. 2012); *Dobrosky v. Arthur J. Gallagher*
4 *Serv. Co., LLC*, No. EDCV 13-0646 JGB (SPx), 2014 U.S. Dist. LEXIS 106345 (C.D. Cal. July
5 30, 2014); *Culley v. Lincare Inc.*, No. 2:15-cv-00081-MCE-CMK, 2016 U.S. Dist. LEXIS 105704
6 (E.D. Cal. Aug. 10, 2016); *Nelson v. Avon Prods.*, No. 13-cv-02276-BLF, 2015 U.S. Dist. LEXIS
7 51104 (N.D. Cal. Apr. 17, 2015); *Orozco v. Illinois Tool Works*, U.S.D.C. Case No. 14-cv-02113-
8 MCE, 2016 U.S. Dist. LEXIS 158115 (E.D. Cal. February 17, 2017); *Metrow v. Liberty Mutual*,
9 U.S.D.C. Case No. EDCV 16-1133 JGB (C.D. Cal. May 1, 2017). Some examples of heavily
10 contested State Court wage and hour class actions where class certification was obtained and
11 BNBD was appointed lead class counsel include *El Pollo Loco Wage and Hour Cases*, Orange
12 County Superior Court, JCCP Case No. 4957 (July 30, 2018); *Torrento v. Lucile Packard*
13 *Children's Hospital*, Santa Clara County Superior Court Case No. 2016-1-CV-291035 (July 17,
14 2018); *Salem v. Alliance*, San Bernardino Superior Court, Case No. CIVRS1401129 (March 8,
15 2016); *Rivers v. Veolia*, Sonoma County Superior Court Case No. SCV 255350 (March 9, 2016);
16 *Mathies v. Union Bank*, San Francisco Superior Court Case No. CGC-10-498077 (Sept. 11, 2013);
17 *Jefferson v. Bottling Co, LLC*, Orange County Superior Court Case No. 30-2009-00180102-CU-
18 OE-CXC (Sept. 7, 2010); *Rangel v. Balboa Ambulance Co.*, 37-2008-00095700-CU-BT-CTL (Fe.
19 11, 2010); *Tan v. CSAA*, Orange County Superior Court, Case No. 30-2008-00231219 (Nov. 23,
20 2009).

21
22 The Settlement Is Fair, Reasonable and Adequate:

23 6. Plaintiff Haller was a non-exempt employee of Defendant during the relevant time
24 period. On October 19, 2023, Plaintiff Haller filed with the LWDA and served on Defendant a
25 notice under Labor Code section 2699.3, stating that Plaintiff Haller intended to serve as a proxy
26 of the LWDA to recover civil penalties on behalf of Aggrieved Employees for alleged Labor Code
27 violations (the “Haller PAGA Notice”). A true and correct copy of the Haller PAGA Notice was
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submitted in support of the motion for preliminary approval. The Haller PAGA Notice alleged violations of California Labor Code §§ 201, 202, 203, 204 et seq., 210, 218, 221, 226(a), 226.7, 227.3, 246, 510, 512, 558(a)(1)(2), 1194, 1197, 1197.1, 1198, 2802, California Code of Regulations, Title 8, Section 11040, Subdivision 5(A)-(B), California Code of Regulations, Title 8, Section 1 1070(14) (Failure to Provide Seating), and Violation of the applicable Industrial Welfare Commission Wage Order(s), and attached a copy of the complaint by Plaintiff Torres as an exhibit to the PAGA Notice.

7. On October 20, 2023, Plaintiff Haller filed a lawsuit against Defendant in the San Bernardino County Superior Court, Case No. CIVSB2326201. The Complaint alleged class action claims for: (1) unfair competition in violation of California Business & Professions Code section 17200 *et seq.*; (2) failure to pay minimum wages; (3) failure to pay overtime wages; (4) failure to provide lawful meal periods; (5) failure to authorize and permit rest periods; (6) failure to furnish accurate itemized wage statements; (7) failure to indemnify necessary business expenses; and, (8) failure to pay sick pay. On January 22, 2024, Plaintiff Haller filed a second, separate lawsuit against Defendant in the Los Angeles County Superior Court, Case No. 24CMCV00085, alleging a single cause of action for civil penalties under PAGA.

8. On January 31, 2024, the Parties participated in a full-day mediation with Jeffrey Fuchsman, a well-regarded mediator, experienced in mediating complex labor and employment matters, and with the assistance of his evaluations, the Parties reached settlement..

9. In this case, the Settlement reached in the total non-reversionary amount of \$1,050,000 as the Gross Settlement Amount is the product of substantial effort by the Parties and counsel should be approved as fair, reasonable and adequate. The Settlement was the result of arms-length negotiations during mediation and between experienced counsel. The Settlement was only reached after extensive factual and legal investigation and research, careful evaluation of the respective parties' strengths and weaknesses, and diligent negotiation efforts. The Settlement amount is a negotiated compromise which took into account risks related to liability, damages, and all the defenses asserted by Defendant. The risk that class certification would not be granted was

1 an extremely important consideration, as the denial of class certification would mean that the class
2 would receive nothing. The fear of retaliation and blacklisting makes it unlikely that absent class
3 certification, individuals would come forward to assert their rights individually. Although I am of
4 the opinion that a class can be certified, I also believe in the fairness of the settlement that is based
5 on factoring in the uncertainty and risks to Plaintiffs involved in not prevailing on one or more of
6 the causes of action or theories alleged, the possibility of non-certification and potential for
7 appeals. Based on the foregoing data and our own independent investigation and evaluation, I am
8 of the opinion that the settlement with the Defendant for the consideration and on the terms set
9 forth in the Settlement is fair, reasonable, and adequate and is in the best interest of the class in
10 light of all known facts and circumstances, including the risk of significant delay, the defenses
11 asserted by Defendant, and numerous potential appellate issues.

12 10. From the inception of the case, Class Counsel has zealously represented the
13 interests of the Class. The settlement was obtained for the benefit of the Class, as opposed to the
14 individual Plaintiffs. Class Counsel have been approved as class counsel in a number of prior cases,
15 have litigated numerous other class action cases, and are competent to represent the Class.

16 11. Plaintiffs and their counsel are adequate representatives in that they have no
17 conflicts with the class and will adequately represent the class.

18
19 Lodestar of BNBD

20 12. In this case, the Settlement reached in the total non-reversionary Gross Settlement
21 Amount is the product of substantial effort by the Parties and counsel should be approved as fair,
22 reasonable and adequate. As part of the settlement, the parties agreed to an award of attorneys'
23 fees equal to 35% of the Gross Settlement Amount. In *Laffitte v. Robert Half Int'l*, 1 Cal. 5th 480,
24 503 (2016), The California Supreme Court both (1) joined the majority of federal and state courts
25 in holding that when class action litigation establishes a monetary fund for the benefit of the class
26 members, the trial court in its equitable powers awards class counsel a fee out of that fund, and
27 (2) expressly approved of one-third as a reasonable percentage in a contingent common fund class
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1 settlement. As such, under *Laffitte*, the requested award set forth in the Settlement Agreement is
2 within this range of reasonableness. The Parties have a fee sharing agreement to allocate
3 attorneys' fees: James Hawkins APLC is to receive 85% of the Attorneys' Fees awarded and
4 BNBD is to receive 15% of the Attorneys' Fees awarded.

5 13. The contemporaneous billing records for BNBD evidence that through April 17,
6 2025, BNBD's current lodestar is \$77,728.75, with additional fees still to be incurred to complete
7 the approval and settlement process. From September 2023 to April 17, 2025, my firm worked on
8 this matter for over 113 hours, with hourly rates for attorneys ranging from \$450 to \$995, resulting
9 in a current lodestar for BNBD in the amount of \$77,728.75. A detailed breakdown of the total
10 fees and the services performed by the firm on this matter is attached hereto as Exhibit #2.

11 14. The rates charged by my firm are in line with the prevailing rates of attorneys in
12 the local Southern California legal community for similar work and, if this were a commercial
13 matter, these are the charges that would be made and presented to the client. My firm's hourly
14 rates are based upon the Laffey Matrix with the appropriate 2% increase adjustment for Southern
15 California. A true and correct copy of the current Laffey Matrix is attached hereto as Exhibit #3.
16 These hourly rates have been approved by Court's throughout California, including the Courts in
17 the Superior Court of California. The reasonableness of BNBD's hourly rates is further confirmed
18 by comparing such rates with the rates of comparable counsel practicing complex and class
19 litigation as detailed in the National Law Journal Billing Survey. See e.g. *Zest IP Holdings, LLC*
20 *v. Implant Direct MFG., LLC*, 2014 U.S. Dist. LEXIS 167563 (S.D. Cal. 2014) (finding that
21 "Mayer Brown's \$775 average billing rate for partners" and "Mayer Brown's \$543 average
22 associate billing rate" are reasonable rates when compared within 21 other firms practicing in the
23 Southern District of California.) This survey is useful to show that BNBD's rates are in line with
24 the comparable rates of the defense counsel that opposes these types of class claims, such as
25 Mayer Brown noted above who is defense counsel in cases currently being prosecuted by BNBD.
26 In another example, Sheppard Mullin Richter & Hampton, who is opposing counsel in many cases
27 prosecuted by BNBD, in years past charged rates as high as \$875 for partners and \$535 for
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1 associates. Similarly, Paul Hastings, another opposing counsel in these types of cases, historically
2 charged between \$900 and \$750 for partners and \$755 and \$335 for associates. Thus, the rates
3 charged by BNBD for comparable work are supported by these examples and are therefore
4 reasonable.

5 15. The rates used by my firm are general Southern California rates, as my firm is
6 located in San Diego a. We also felt that the use of Southern California rates in general is
7 reasonable given the Class is located geographically throughout California. In addition, there are
8 few attorneys in San Bernardino who prosecute employment class actions, and while it might be
9 possible to find one, I performed an internet search as a prospective client may do and found few
10 options, none of which had extensive experience with class actions. Indeed, most of the search
11 results were from out-of-town attorneys. “When a plaintiff needs to hire out-of-town counsel, a
12 trial court must consider counsel's “home market rate” when setting the hourly rate, rather than
13 the local market rate.” *Caldera v. Dep't of Corr. & Rehab.*, 48 Cal. App. 5th 601, 609 (2020). In
14 *Caldera*, the Court noted the difficulty of hiring a contingent employment attorney located in San
15 Bernardino and therefore held that it was “abuse of discretion because the court failed to consider
16 the out-of-town market rates of the attorneys involved in this case.” *Caldera*, 48 Cal. App. 5th at
17 611. Thus, *Caldera* supports the contention that Southern California rates can be considered here,
18 where the claims involved an employment class action covering a large Class geographically
19 dispersed around Southern California, and not just in San Bernardino. Or put another way, the
20 community of this settlement is Southern California, and not just San Bernardino.

21 16. The rates used by Class Counsel were between \$850 and \$950 for partners, \$450
22 and \$750 for associate attorneys depending on experience, and \$250 for paralegals. As discussed
23 in the motion, these rates are based on the Laffey Matrix with a Southern California adjustment.
24 A true and correct copy of the current Laffey Matrix is attached hereto as Exhibit #1. This Laffey
25 Matrix provides the following billing rates: (1) paralegals - \$258, (2) attorneys 1 to 3 years - \$473,
26 (2) attorneys 4 to 7 years - \$581, (3) attorneys 8 to 10 years - \$839, (4) attorneys 11 to 19 years -
27 \$948, and (5) attorneys with 20+ years - \$1,141. The rates used are consistent with this Laffey
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Matrix, and in most instances, below the Laffey Matrix. The Laffey Matrix has been relied upon to establish market rates. See, e.g., *Syers Properties III, Inc. v. Rankin*, 226 Cal.App.4th 691, 702 (2014) [finding no abuse of discretion in employing Laffey matrix in San Francisco litigation].) “The Laffey Matrix is a United States Department of Justice billing matrix that provides billing rates for attorneys at various experience levels in the Washington, D.C., area and can be adjusted to establish comparable billing rates in other areas using data from the United States Bureau of Labor Statistics.” *Pasternack v. McCullough*, 65 Cal.App.5th 1050, 1057, fn. 5 (2021). There is no specific adjustment provided by the federal government for San Bernardino, only the Los Angeles, Orange and San Diego metro areas, which adjust the Laffey Matrix higher.

17. If adjustment of the rates is necessary to a lower rate for the community the Inland Empire, a good source of market rates are prior awards in class settlements, which rates are for complex litigation and therefore higher than normal attorney rates. The hourly rate set by the trial court must be “within the range of reasonable rates charged by and judicially awarded comparable attorneys for comparable work.” *Children’s Hospital & Medical Center v. Bonta*, 97 Cal.App.4th 740, 783 (2002). In looking at published fee awards in the Riverside / San Bernardino area, in 2019, Judge Bernal, who handles cases in Riverside, has approved the following rates in class settlement approval: “\$875 for McLane, who has 32 years of experience; \$600 for Battle, who has 10 years of experience; \$875 for Kaye, who has 30 years of experience; \$715 for Goodman, who has 15 years of experience; \$640 for Goad, who has 13 years of experience; \$480 for Hamme, who has six years of experience; \$390 for Hill, who has four years of experience; and \$390 for Fruitwala, who has four years of experience.” *McKibben v. McMahon*, 2019 U.S. Dist. LEXIS 34110, *41 (C.D. Cal. 2019). In 2020, Judge Bernal approved the following rates in a class action award in a contested motion: C. Brooks Cutter (20+ year attorney) at \$900, John Parker (17 year attorney) at \$650, and Celine Cutter (4 year attorney) at \$300. *Pike v. Cty of San Bernardino*, 2020 U.S. Dist. LEXIS 40404, *, 2020 WL 1049912 (C.D. Cal. 2020).

18. The rates billed by my firm are comparable to the above rates, particularly given these examples were five years ago. But at a maximum, the above demonstrate that a 20%

1 downward adjustment would put Class Counsel's rates at or below the above examples from five
2 years ago. A 20% downward adjustment of BNBD's rates across the board would result in the
3 following adjusted rates: \$680 to \$760 for partners, \$360 to \$600 for associate attorneys
4 depending on experience, and \$200 for paralegals. The resulting adjusted lodestar for BNBD
5 would be \$62,183.

6
7 Expenses of BNBD

8 19. BNBD incurred litigation expenses in the amount of \$3,280.76. These litigation
9 expenses incurred by BNBD include the expenses incurred for filing fees, attorney service charges
10 (One Legal, Knox), Case Anywhere charges, and legal research charges (Lexis), all of which are
11 costs normally billed to and paid by the client. The details of the litigation expenses incurred are
12 set forth in Exhibit #2 attached hereto.

13
14 I declare under the penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct.

16 Executed this 18th day of April, 2025, at San Diego, California.

17
18 
19 Kyle Nordrehaug

EXHIBIT #1

Blumenthal Nordrehaug Bhowmik De Blouw LLP

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FIRM RESUME

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

ATTORNEY BIOGRAPHIES

Norman B. Blumenthal

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

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

Admitted: 1973, Illinois; 1976, California

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

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

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

Summer Intern (1971) with Harvard Voluntary Defenders

Kyle R. Nordrehaug

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

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

Admitted: 1999, California

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

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

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

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

Aparajit Bhowmik

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

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

Admitted: 2006, California

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

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

Awards: Rising Star 2015

Nicholas J. De Blouw

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

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

Admitted: 2011, California

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

Piya Mukherjee

Associate Attorney

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

Admitted: 2010, California

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

Victoria Rivapalacio

Associate Attorney

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

Admitted: 2011, California

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

Ricardo Ehmman

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2018, California; 2004, Nevada

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

Jeffrey S. Herman

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2011, California; 2016 Arizona

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

Charlotte James

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

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

Christine Levu

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2012, California

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

Andrew Ronan

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

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

Scott Blumenthal

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, New Mexico

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

Sergio Julian Puche

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2013, California

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

Trevor Moran

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, California

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

Adolfo Sanchez Contreras

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2024, California; 2014, Mexico

Educated: The Juarez University

REPORTED CASES

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

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

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

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

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

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

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

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

EXHIBIT #2

Blumenthal Nordrehaug Bhowmik DeBlouw LLP

2255 CALLE CLARA
LA JOLLA, CA - California 92037-3107

INVOICE

Invoice # 1
Date: 04/17/2025
Due On: 05/17/2025

Keith Haller
13920 Smoke Tree Rd
Victorville, CA 92395

CA3107

National Retail Transportation

Services

Attorney	Date	Notes	Quantity	Rate	Total
NDB	09/13/2023	Review and analyze original intake notes. Legal research regarding related litigation in state and federal courts. Research Defendant's business operations. Conference with Plaintiff.	3.90	\$850.00	\$3,315.00
NDB	09/14/2023	Review Plaintiff's individual claims including DFEH and retaliation claims. Analyze off the clock work tasks. Review emails and documents from Plaintiff regarding the same. Legal research recent court opinions.	3.60	\$850.00	\$3,060.00
NDB	09/20/2023	Review and analyze entire employment file for legal claims. Analyze all paystubs and company policies. Legal research regarding 226(a) claims and recent settlements. Conference with Plaintiff to clarify facts for complaint.	4.50	\$850.00	\$3,825.00
NDB	09/25/2023	Draft original complaint. Review and analyze facts and law.	4.30	\$850.00	\$3,655.00
NDB	10/10/2023	Draft complaint.	3.00	\$850.00	\$2,550.00
NDB	10/16/2023	Review and revise complaint per Plaintiff's instructions. Send complaint to Plaintiff for approval to file. Call to discuss claims and potential outcomes.	2.20	\$850.00	\$1,870.00
NDB	10/17/2023	Review case file. Draft internal case notes memo detailing claims and related litigation.	2.10	\$850.00	\$1,785.00

RE	10/19/2023	Review case notes/damage analysis	0.75	\$675.00	\$506.25
RE	10/19/2023	Review & analyze employment file documents	2.50	\$675.00	\$1,687.50
NDB	10/19/2023	Legal research regarding PAGA claims. Draft PAGA Notice. Upload to the LWDA website.	2.20	\$850.00	\$1,870.00
JH	10/20/2023	Review complaint compared to first-filed matter; discuss with KN	0.50	\$750.00	\$375.00
RE	10/20/2023	Review/edit/revise class action complaint; finalize draft for same day filing	2.75	\$675.00	\$1,856.25
RE	10/20/2023	Draft summons & civil case cover sheet re class action	0.50	\$675.00	\$337.50
RE	10/20/2023	Review & finalize class action complaint package; file in SB sup. ct.	0.75	\$675.00	\$506.25
RE	10/30/2023	Review court returned documents; review docket re class action; memo to firm re judicial/ department assignment and status of initial case management conference	0.50	\$675.00	\$337.50
HD	10/31/2023	Review filed Class complaint. Add case to Master Case Sheet. Create Case Management Flow Chart. Email introductory correspondence to client now that Complaint has been filed. Register to track the case via Lexis-Court Link.	0.50	\$250.00	\$125.00
NDB	11/11/2023	Legal research regarding transportation exemption and the FMCSA. Review court docket and case file. Status update to Plaintiff.	3.40	\$850.00	\$2,890.00
JH	11/28/2023	Review matter; discuss with ND	0.40	\$750.00	\$300.00
RE	12/15/2023	Review file; prep initial docs for service of process re class action; identify reg. agent; send out for service via Knox.	0.70	\$675.00	\$472.50
RE	12/28/2023	File proof of service of summons re class action; memo to firm re post service written discovery	0.50	\$675.00	\$337.50
JH	01/02/2024	Correspondence with defense counsel re service of PAGA matter	0.30	\$750.00	\$225.00
NDB	01/05/2024	Analyze late payment of wage claims under Labor Code Sections 204 and 210. Review pay statements and court docket. Legal research regarding previous settlements with similar claims. Status update to Plaintiff.	2.90	\$850.00	\$2,465.00
RE	01/20/2024	Draft PAGA only complaint	3.75	\$675.00	\$2,531.25
RE	01/22/2024	Draft summons & civil case cover sheet re PAGA action	0.50	\$675.00	\$337.50
RE	01/22/2024	Review & finalize PAGA only complaint package;	0.75	\$675.00	\$506.25

		file in LA Sup. Ct.			
RE	01/22/2024	Review court-returned docs re PAGA action; review docket; memo to firm re judicial/department assignment & status of initial case management conference	0.50	\$675.00	\$337.50
HD	01/22/2024	Review filed Paga complaint. Add case to Master Case Sheet. Register to track the case via Lexis-Court Link.	0.30	\$250.00	\$75.00
TM	01/24/2024	Reviewed Court's notice of status conference and order.	0.20	\$450.00	\$90.00
RE	03/19/2024	Review email from OPC re service of process re Notice & Acknowledgment of Receipt; prep docs for service of process; draft NAR; email docs to OPC; instruct staff to mail hard copies per code re PAGA action	1.00	\$675.00	\$675.00
RE	04/22/2024	File proof of service of summons re PAGA action w executed NAR; email to team re post service written discovery	0.50	\$675.00	\$337.50
TM	04/24/2024	Emails to and from OPC re CMC meet and confer requirement.	0.80	\$450.00	\$360.00
TM	04/25/2024	Email to and from OPC re meet and confer per CMC.	0.40	\$450.00	\$180.00
TM	04/26/2024	Planned and prepared for upcoming meet and confer call with OPC re CMC requirements.	0.80	\$450.00	\$360.00
TM	04/29/2024	Drafted Joint CMC statement; Prepared for upcoming meet and confer call with OPC re CMC requirement; Meet and confer call with OPC; email to OPC re meet and confer call; Email to OPC re Joint CMC Statement.	2.70	\$450.00	\$1,215.00
JH	04/29/2024	Discuss matter with TM re meet and confer with defense counsel	0.40	\$750.00	\$300.00
TM	04/30/2024	Emails to and from OPC re Joint CMC Statement; reviewed Defendant's portion of Joint CMC Statement; revised Joint CMC Statement.	1.00	\$450.00	\$450.00
TM	05/01/2024	Finalized and signed Joint CMC statement; advised HD re filing/service of Joint CMC statement.	0.40	\$450.00	\$180.00
HD	05/01/2024	Execute and finalize Proof of Service. Process and submit Joint Case Management Statement to Court for filing via One Legal and served via Case Anywhere.	0.50	\$250.00	\$125.00
TM	05/06/2024	Planned and prepared for Case Management Conference; Attended CMC; advised firm re status following CMC.	2.10	\$450.00	\$945.00

HD	05/06/2024	Draft Notice of Ruling and Trial Setting Conference. Forward to Attorney Moran for review and finalization.	0.50	\$250.00	\$125.00
JH	05/08/2024	Review/analyze Defendant's Answer; circulate and update file	0.40	\$750.00	\$300.00
TM	05/08/2024	Reviewed and revised Notice of Ruling and notice of TSC to Defendant; advised HD re filing/service of Notice.	0.50	\$450.00	\$225.00
HD	05/08/2024	Execute and finalize Proof of Service. Process and submit Notice of Ruling and Trial Setting Conference to court for filing via One Legal and serve via Case Anywhere.	0.50	\$250.00	\$125.00
NDB	05/15/2024	Review related litigation and potential overlap. Legal research regarding 2802 and cell phone reimbursement claims. Correspondence to related case counsel. Status update to Plaintiff.	2.10	\$850.00	\$1,785.00
HD	06/06/2024	Download and obtain copy of Defendant's Answer. Upload and save to electronic file.	0.20	\$250.00	\$50.00
HD	06/06/2024	Review ROA and current Orders. Prepare Status Conference Statement shell for Attorney Herman.	0.50	\$250.00	\$125.00
HD	06/21/2024	ROA review and obtain remote appearance information for Status Conference.	0.20	\$250.00	\$50.00
SP	06/24/2024	Prepared and appeared for hearing. Updated Orders. Reviewed, revised and filed Notice of handling attorney.	1.90	\$675.00	\$1,282.50
HD	06/26/2024	Draft notice of change of handling attorney. Forward to attorney Puche for review and finalization.	0.50	\$250.00	\$125.00
TM	07/08/2024	Discussed status of case with team to update client; telephone call to client re case status.	0.40	\$450.00	\$180.00
TM	08/12/2024	Email from OPC re upcoming TSC statement; discussed with team.	0.30	\$450.00	\$135.00
SP	08/12/2024	Reveiwed correspondence and discussed with team.	0.40	\$675.00	\$270.00
TM	08/13/2024	Email to and from OPC re stipulation to continue TSC.	0.40	\$450.00	\$180.00
TM	08/13/2024	Email to and from OPC re TSC; drafted joint stipulation to continue TSC; discussed status with team.	1.20	\$450.00	\$540.00
SP	08/13/2024	Reviewed correspondence, pleadings and related cases. Reveiwed Joint SC Statement. Sent email to Team re next steps.	0.70	\$675.00	\$472.50

TM	08/14/2024	Email from OPC re joint stip to continue CMC; finalized and signed joint stip; advised Heather re filing/service.	0.60	\$450.00	\$270.00
TM	08/29/2024	Prepared for upcoming CMC; Attended CMC; advised firm re status following hearing.	1.50	\$450.00	\$675.00
TM	09/03/2024	Drafted Notice of Hearing/Notice of Ruling; advised HD re filing/service.	0.60	\$450.00	\$270.00
HD	09/03/2024	Execute and finalize Proof of Service. Process and submit Notice of Ruling; Notice of Hearing to court for filing via One Legal and serve via Case Anywhere.	0.50	\$250.00	\$125.00
TM	09/18/2024	Review filed; drafted Plaintiff's CMC Statement.	0.80	\$450.00	\$360.00
TM	09/18/2024	Email to and from client re case status.	0.40	\$450.00	\$180.00
JH	09/23/2024	Review/revise draft joint report; advise TM	0.30	\$750.00	\$225.00
TM	09/23/2024	Revised Plaintiff's CMC statement; discussed status of case and related settlement with team;	0.60	\$450.00	\$270.00
HD	09/23/2024	Execute and finalize Proof of Service. Process and submit Plaintiff's CMC Statement to Court for filing via One Legal and serve via email.	0.50	\$250.00	\$125.00
SP	10/02/2024	Reviewed calendar, docket and correspondence for upcoming deadline/appearance and advised team.	0.20	\$675.00	\$135.00
JH	10/04/2024	Review draft longform; discuss with ND	1.00	\$750.00	\$750.00
JH	10/07/2024	Discuss with co-counsel re longform agreement and proposed revisions thereto	0.40	\$750.00	\$300.00
TM	10/07/2024	Planned and prepared for upcoming CMC.	0.60	\$450.00	\$270.00
TM	10/08/2024	Attended Case Management Conference; advised firm re status.	1.70	\$450.00	\$765.00
JH	10/08/2024	Discuss CMC with TM; advise	0.30	\$750.00	\$225.00
TM	10/10/2024	Email to and from client re case status; telephone call with client re case status.	0.60	\$450.00	\$270.00
TM	10/11/2024	Reviewed Court's order continuing CMC.	0.20	\$450.00	\$90.00
JH	10/15/2024	Review/analyze revise longform agreement discuss with ND	0.50	\$750.00	\$375.00
TM	10/16/2024	Reviewed file; Drafted Plaintiff's declaration ISO Motion for Preliminary Approval.	2.00	\$450.00	\$900.00
TM	10/21/2024	Discussed status of amended complaint and client declaration with team; reviewed and revised proposed amended complaint; advised team re	2.00	\$450.00	\$900.00

		proposed amended complaint; revised client declaration.			
JH	10/21/2024	Corresp. w co-counsel re agreement and supporting docs; review amended complaint and advise TM	0.70	\$750.00	\$525.00
JH	10/22/2024	Call with co-counsel re agreement and amended complaint; review/analyze MPA draft	0.70	\$750.00	\$525.00
TM	10/22/2024	Email to client re declaration ISO preliminary approval; advised TG re declaration; telephone call with client re Declaration.	0.50	\$450.00	\$225.00
KN	10/22/2024	Review draft motion for prelim approval; draft declaration ISO motion; prepare exhibits; emails with co-counsel	1.50	\$950.00	\$1,425.00
TM	10/22/2024	Reviewed revisions to Amended Complaint; emails to co-counsel re Amended Complaint; email to client re Declaration ISO Preliminary approval;	0.80	\$450.00	\$360.00
SP	10/22/2024	Reveiwed and revised First Amended Complaint. Discussed with JSH and TM.	0.70	\$675.00	\$472.50
NB	10/22/2024	Review settlement agreement for final, analyze.	3.00	\$995.00	\$2,985.00
KN	10/23/2024	Revise and finalize declaration; review revised motion; memo to staff regarding Agreement; respond to co-counsel.	1.00	\$950.00	\$950.00
NDB	10/23/2024	Review and analyze settlement agreement and exhibits thereto. Send agreement for signature to Plaintiff. Call to discuss terms and explain approval process.	1.30	\$850.00	\$1,105.00
KN	10/24/2024	Review final motion ; execute motion; emails with co-counsel	0.50	\$950.00	\$475.00
TM	11/01/2024	Reviewed Court's Notice of case reassignment.	0.20	\$450.00	\$90.00
HD	11/04/2024	Execute and finalize Proof of Service. Serve Notice of Case Reassignment and Order for Plaintiff to Give Notice to opposing counsel via email and submit the POS to Court for filing via One Legal.	0.30	\$250.00	\$75.00
SP	11/06/2024	Reveiwed calendar, docket and case file. Prepared for deadline/hearing and discussed with Team.	0.20	\$675.00	\$135.00
TM	11/18/2024	Reviewed file and past correspondence to draft Joint CMC Statement; Reviewed court docket; advised team re case status.	0.60	\$450.00	\$270.00
TM	11/22/2024	Email to and from OPC re stipulation to continue CMC; reviewed proposed stipulation.	0.50	\$450.00	\$225.00

SP	11/26/2024	Reveiwed uploaded Joint Stipulation. Ensured download, saving and calendaring by team.	0.50	\$675.00	\$337.50
KN	11/27/2024	Review revised stipulation and draft amended complaint; respond; memo to staff	0.50	\$950.00	\$475.00
TM	12/02/2024	Email from client re case status; telephone call with client re case status.	0.40	\$450.00	\$180.00
SP	12/02/2024	Reveiwed calendar, case notes, docket pleadings and correspondence to prepare for deadline/appearance. Discussed with Team.	0.20	\$675.00	\$135.00
TM	12/04/2024	Email from OPC re Status Conference.	0.20	\$450.00	\$90.00
KN	12/06/2024	Review status and motion; review tentative; email to counsel	0.30	\$950.00	\$285.00
HD	12/09/2024	Draft Plaintiff's Request and [Proposed] Order For Dismissal of Action Without Prejudice; Declaration ISO Request For Dismissal of Action Without Prejudice Pursuant to CRC 3.770 and Proof of Service.	0.50	\$250.00	\$125.00
HD	12/09/2024	Prepare Request For Dismissal Without Prejudice for the PAGA matter.	0.50	\$250.00	\$125.00
SP	12/11/2024	Reviewed correspondence, case notes, documents, orders, docket, MOU and stipulation for leave to file amended complaint. Drafted, revised and finalized Request for Dismissal and Declaration pursuant to CRC 3.770. Arranged for service and filing.	1.30	\$675.00	\$877.50
KN	01/06/2025	Review emails; review tentative; analysis of issues; respond.	0.30	\$950.00	\$285.00
TM	01/06/2025	Reviewed Court's tentative ruling re MPA.	0.20	\$450.00	\$90.00
SP	01/06/2025	Reveiwed and analyzed preliminary approval tentative. Reviewed correspondence from client. Discussed with team. Informed client Preliminary approval was granted and discussed next steps.	0.80	\$675.00	\$540.00
TM	01/09/2025	Reviewed Court's order continuing CMC.	0.20	\$450.00	\$90.00
HD	01/09/2025	Execute and finalize Proof of Service. Process and submit Joint Stipulation to Continue the Case Management Conference to Court for filing via One Legal and serve via email.	0.50	\$250.00	\$125.00
SP	01/09/2025	Reveiwed and analyzed orders, docket, register of actions, pleadings and case notes. Drafted Joint Stipulation to continue CMC and sent to OPC in PAGA Matter. Reviewed and analyzed and sent Order continuing CMC in CLASS for calendaring. Finalized and filed Joint Stipulation.	1.70	\$675.00	\$1,147.50

KN	01/09/2025	Review emails; review signed order; memo to file	0.40	\$950.00	\$380.00
HD	01/14/2025	Obtain download and circulate Order for Dismissal of Action Without Prejudice as to the Class matter.	0.20	\$250.00	\$50.00
TM	01/14/2025	Reviewed Court's order for dismissal of action.	0.20	\$450.00	\$90.00
SP	01/15/2025	Reviewed case docket, register of actions, cross referenced calendar and reviewed pleadings and case notes to analyze case for update to client.	0.30	\$675.00	\$202.50
ASC	01/24/2025	Prepare to attend CMC hearing; hearing vacated, case dismissed	0.50	\$450.00	\$225.00
KN	02/11/2025	Review emails; review spreadsheet; doublecheck calculations	0.50	\$950.00	\$475.00
KN	03/26/2025	Review status; review Admin report	0.20	\$950.00	\$190.00
KN	04/02/2025	Review emails from co-counsel and Defendant; review issues in Court ruling; analysis of issue; advise co-counsel	1.00	\$950.00	\$950.00
KN	04/14/2025	Review draft Admin declaration	0.30	\$950.00	\$285.00
KN	04/16/2025	Review billing for accuracy; memo to staff; emails with co-counsel.	0.50	\$950.00	\$475.00
KN	04/16/2025	Legal research on hourly rates for the community; memo to co-counsel with decisions	1.00	\$950.00	\$950.00
KN	04/17/2025	Draft declaration ISO motion; finalize billing; emails with co-counsel	2.00	\$950.00	\$1,900.00
				Quantity Subtotal	113.05
				Services Subtotal	\$77,728.75

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	10/19/2023	PAGA Filing Fee	1.00	\$75.00	\$75.00
Expense	10/20/2023	Docs purchased from court website	1.00	\$11.50	\$11.50
Expense	10/27/2023	Onelegal/Court Fees	1.00	\$1,496.07	\$1,496.07
Expense	12/03/2023	LexisNexis	1.00	\$29.00	\$29.00
Expense	12/28/2023	Onelegal/Court Filing Fee	1.00	\$18.62	\$18.62
Expense	12/30/2023	Onelegal/Court Fees	1.00	\$51.48	\$51.48
Expense	12/31/2023	KNOX Filing and Messenger Service	1.00	\$152.85	\$152.85

Expense	01/22/2024	Onelegal/Court Fees	1.00	\$467.55	\$467.55
Expense	04/23/2024	Onelegal/Court Fees	1.00	\$51.48	\$51.48
Expense	04/23/2024	Onelegal/Court Fees	1.00	\$19.71	\$19.71
Expense	04/23/2024	Onelegal/Court Fees	1.00	\$19.12	\$19.12
Expense	04/24/2024	Onelegal/Court Fees	1.00	\$51.48	\$51.48
Expense	05/25/2024	One Legal Invoice No. 06064879	1.00	\$20.68	\$20.68
Expense	06/06/2024	One Legal Invoice No. 06096606	1.00	\$19.71	\$19.71
Expense	07/03/2024	Case Anywhere fees.	1.00	\$125.43	\$125.43
Expense	08/15/2024	One Legal Invoice No. 06289614	1.00	\$51.48	\$51.48
Expense	08/27/2024	One Legal/Court Fees	1.00	\$41.39	\$41.39
Expense	09/16/2024	One Legal/Court Fees	1.00	\$5.40	\$5.40
Expense	09/16/2024	One Legal/Court Fees	1.00	\$15.39	\$15.39
Expense	10/05/2024	Case Anywhere Fees.	1.00	\$171.00	\$171.00
Expense	11/05/2024	One Legal Invoice No. 06529891	1.00	\$12.37	\$12.37
Expense	01/07/2025	One Legal/Court Fees	1.00	\$42.49	\$42.49
Expense	01/09/2025	One Legal/Court Fees	1.00	\$23.44	\$23.44
Expense	01/09/2025	One Legal/Court Fees	1.00	\$45.12	\$45.12
Expense	01/14/2025	Case Anywhere Fees.	1.00	\$165.00	\$165.00
Expense	02/05/2025	Caseanywhere	1.00	\$49.00	\$49.00
Expense	03/05/2025	Case Anywhere Fees	1.00	\$49.00	\$49.00
Expenses Subtotal				\$3,280.76	

Time Keeper	Quantity	Rate	Total
Norm Blumenthal	3.0	\$995.00	\$2,985.00
Nicholas De Blouw	35.5	\$850.00	\$30,175.00
Ricardo Ehmann	15.95	\$675.00	\$10,766.25
Jeffrey Herman	5.9	\$750.00	\$4,425.00
Trevor Moran	26.6	\$450.00	\$11,970.00
Kyle Nordrehaug	10.0	\$950.00	\$9,500.00
Sergio Puche	8.9	\$675.00	\$6,007.50

Heather Drosi	6.7	\$250.00	\$1,675.00
Adolfo Sanchez Contreras	0.5	\$450.00	\$225.00
Quantity Total			113.05
Subtotal			\$81,009.51
Total			\$81,009.51

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1	05/17/2025	\$81,009.51	\$0.00	\$81,009.51
Outstanding Balance				\$81,009.51
Total Amount Outstanding				\$81,009.51

Please make all amounts payable to: Blumenthal Nordrehaug Bhowmik DeBlouw LLP

Please pay within 30 days.

EXHIBIT #3

LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389

6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

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

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