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8 Attorneys for Plaintiffs
9 LES THOMAS, JASON WOOL, AND FELICIA KIM

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF SAN MATEO**

12 **CIVIL COMPLEX DEPARTMENT**

13 SOLARCITY WAGE AND HOUR CASES,
14 Coordination Proceeding
15 Special Title (CRC Rule. 3.550)

Pursuant to Judicial Council Coordination
Proceedings No. JCCP 4945

*[Irving v. SolarCity Corp., San Mateo
Superior Court, Case No. CIV 525975 and
Thomas v. SolarCity Corp., San Diego
County Superior Court, Case No. 37-2017-
00018317]*

Department 2, Hon. Marie S. Weiner
Assigned Coordination Trial Judge

**DECLARATION OF JAMIN S.
SODERSTROM IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS SETTLEMENT**

1 and settlement.

2 5. I prosecuted this litigation solely on a contingent-fee basis and assumed the risk
3 that we would not receive any compensation for prosecuting claims against the Defendant.
4 Beginning in January 2017, I devoted my firm's time and resources to this matter, which
5 necessarily took time and resources away from other pending and potential matters.

6 6. My firm and I, as its founding shareholder, have experience with complex civil
7 litigation and, specifically, class action litigation in state and federal courts and arbitration. I have
8 been involved in prosecuting individual, class, and PAGA claims against numerous corporate
9 defendants. Other than when I was serving as a federal law clerk, I have actively practiced
10 complex civil litigation for eleven years. I received my undergraduate degree from Pepperdine
11 University in 2002, my MBA from Grand Canyon University in 2004, and my law degree from
12 Pepperdine University in 2008. I have been licensed to practice law in California since 2008. In
13 law school, I served as the head research assistant for then-Dean Kenneth W. Starr for two years
14 and also worked full-time for one semester for then Chief Judge Alex Kozinski in the United
15 States Court of Appeals for the Ninth Circuit. I practiced at Sullivan & Cromwell LLP in Los
16 Angeles, California from 2008 to 2010; Reynolds Frizzell LLP in Houston, Texas from 2012 to
17 2015 (named one of the Top 10 litigation boutiques in the nation by Benchmark the last several
18 years); and Call & Jensen, A Professional Corporation from 2015 to 2016 in Newport Beach,
19 California. Between practicing at Sullivan & Cromwell LLP and Reynolds Frizzell LLP, I served
20 as a law clerk to the Honorable Harold R. DeMoss Jr. in the United States Court of Appeals for
21 the Fifth Circuit in Houston, Texas from 2010 to 2012.

22 7. Prior to August 2016, I had experience defending class action cases, including
23 employment-related class actions, among other forms of complex civil litigation. Since founding
24 my firm in August 2016, a large part of my practice has involved prosecuting consumer and
25 employment class action cases. I am currently prosecuting the following proposed class action
26 cases as lead plaintiffs' counsel:
27
28

1 a. *McKee v. Audible, Inc.*, Case No. 2:17-cv-01941, a consumer class action case
2 pending in the United States District Court for the Central District of California and awaiting
3 preliminary approval of a nationwide class action settlement;

4 b. *Beals v. Audible, Inc.*, Case No. 1:17-cv-09838, a consumer class action case
5 pending in the United States District Court for the Southern District of New York and awaiting
6 preliminary approval of a nationwide class action settlement;

7 c. *Fisse v. Audible, Inc.*, Case No. 5:18-cv-00211, a consumer class action case
8 pending in the United States District Court for the Eastern District of North Carolina and awaiting
9 preliminary approval of a nationwide class action settlement;

10 d. *Weber v. Amazon.com, Inc.*, Case No. 2:17-cv-08868, a consumer class action case
11 pending in the United States District Court for the Central District of California and awaiting
12 preliminary approval of a nationwide class action settlement;

13 e. *Hart v. Charter Communications, Inc.*, Case No. 8:17-cv-00556, a consumer class
14 action case pending in the United States District Court for the Central District of California and
15 currently stayed pending an arbitrator's determination of arbitrability of certain claims;

16 f. *Jimenez v. Charter Communications, Inc.*, Case No. 2:18-cv-06480, a consumer
17 class action case pending in the United States District Court for the Central District of California;

18 g. *Ehrman v. Cox Communications, Inc.*, Case No. 2:18-cv-05580, a consumer class
19 action case pending in the United States District Court for the Central District of California;

20 h. *Bieger v. Houzz Inc.*, Case No. 18CV325624, an employment class action case
21 pending in the California Superior Court for the County of Santa Clara and pursuing class
22 arbitration;

23 i. *Palacios v. Electrode Technologies, Inc.*, and employment class action pursuing
24 class arbitration; and

25 j. *Higgins v. Holland Motor Homes*, Case No. 37-2017-00037446, an employment
26 class action case pending in the California Superior Court for the County of San Diego and
27 currently awaiting final approval of a \$950,000 class and PAGA settlement

28 8. Based on my qualifications, my hourly rate during this matter (where most of my

1 work was performed in 2017) is \$650.00. I am informed and believe through conversations with
2 other attorneys, as well as reviewing declarations filed by other attorneys, that my rate is lower
3 than the normal hourly rate of partners at other law firms practicing in this field. I believe my
4 hourly rate to be reasonable, particularly in light of a \$1,000,000 employment class action
5 settlement in *Marin v. General Assembly Space Inc.*, Case No. 2:17-cv-05449-SJO-KSx (C.D.
6 Cal., Judge Otero), where the court in November 2018 approved a request for attorneys' fees and
7 costs in which my lodestar for hours worked during 2017 was based on a \$650.00 hourly rate.

8 9. My law firm maintains and retains records of persons who have billed time for
9 their work in this matter. I have reviewed the relevant time records and have confirmed that
10 during the period of January 2017 through December 2018, I performed a total of 209.2 hours of
11 legal work related to this matter. My normal hourly rate at the time this work was performed
12 was \$650.

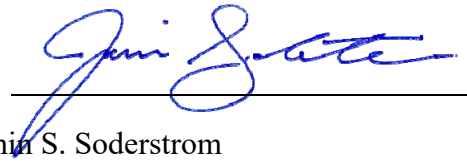
13 10. During the same time period, my paralegal, Diana Alderete worked a total of 35.1
14 hours on this matter. She has been a paralegal for more than 10 years and is experienced in
15 preparing wage and hour and employment related cases such as this one for class certification
16 and trial. Her hourly rate is \$225. I am informed and believe through conversations with other
17 attorneys, as well as reviewing declarations filed by other attorneys, that Ms. Alderete's hourly
18 rate is on par with normal hourly rate of experienced litigation paralegals at other law firms
19 practicing in this field. I believe her hourly rate to be reasonable.

20 11. As explained above, my firm's total lodestar for this case is \$143,877.50. A copy
21 of the invoice my firm produced in connection with this matter is attached as **Exhibit 1**. Although
22 my firm's lodestar in this case is \$143,877.50, I have entered into a separate agreement with
23 other Plaintiffs' counsel whereby my firm will receive 17 percent of the total attorney fees
24 awarded by the Court, in addition to reimbursement of my firm's costs and expenses (subject to
25 Court approval) which totaled \$1,885.39 and which were reasonably and necessarily committed
26 to the prosecution of this matter. *See* Exhibit 1.

27 12. I agree with other Class Counsel that the settlement is fair, reasonable, and
28 adequate, provides class members with substantial and meaningful relief, and should be finally

1 approved. I further agree with other Class Counsel that the collective request for an award of
2 attorneys' fees equal to one-third of the total class settlement amount is fair and reasonable and
3 is fully supported by counsel's respective lodestars and the results achieved. I respectfully
4 request that the Court grant final approval of the settlement and grant the requested award of
5 attorneys' fees and costs.

6 I declare under penalty of perjury under the laws of the United States of America and the
7 State of California that the foregoing is true and correct. This Declaration was executed on
8 January 3, 2019 at Irvine, California.

9 By: 

10 Jamin S. Soderstrom

11 *Counsel for Plaintiffs Les Thomas, Jason*
12 *Wool, and Felicia Kim*

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INVOICE

Date: 12/28/2018
Due Date: 01/27/2019

Les Thomas

Thomas - 00002

Thomas, Leslie Arthur v. SolarCity Corporation, et al. (PAGA)

Services

Date	Notes	Attorney	Quantity	Rate	Total
01/20/2017	Call with L. Thomas regarding potential claims against Solar City; related online research	JSS	1.10	\$650.00	\$715.00
01/23/2017	Analyze documents received from L. Thomas regarding DLSE proceedings and arbitration agreement	JSS	1.50	\$650.00	\$975.00
01/24/2017	Review correspondence from L. Thomas	JSS	0.20	\$650.00	\$130.00
01/24/2017	Prepare authorization for release of records and cover letter	JSS	0.60	\$650.00	\$390.00
01/25/2017	Research potential claims against SolarCity; start preparing draft class action complaint	JSS	2.90	\$650.00	\$1,885.00
01/27/2017	Analyze petition filed by SolarCity; calls with L. Thomas; related correspondence	JSS	2.70	\$650.00	\$1,755.00
01/29/2017	Correspondence with L. Thomas re approach to DLSE hearing and SolarCity petition	JSS	0.60	\$650.00	\$390.00
01/30/2017	Research regarding other cases filed against SolarCity	JSS	2.20	\$650.00	\$1,430.00
01/30/2017	Prepare request for Labor Code documents to SolarCity	JSS	0.40	\$650.00	\$260.00

01/31/2017	Review of SolarCity petition to compel arbitration; research into enforceability of agreement	JSS	2.50	\$650.00	\$1,625.00
01/31/2017	Prepare PAGA notice letter for PAGA Administrator and SolarCity	JSS	3.40	\$650.00	\$2,210.00
02/01/2017	Prepare opposition to petition to compel arbitration	JSS	3.70	\$650.00	\$2,405.00
02/01/2017	Call with L. Thomas regarding options for responding to SolarCity	JSS	0.80	\$650.00	\$520.00
02/01/2017	Correspondence with M. Rafique regarding document collection and service	JSS	0.10	\$650.00	\$65.00
02/02/2017	Analyze options for responding to Petition or withdrawing complaint and filing new case(s)	JSS	1.30	\$650.00	\$845.00
02/02/2017	Call with L. Thomas regarding next steps	JSS	0.20	\$650.00	\$130.00
02/02/2017	Research and prepare withdrawal letter for DLSE claims	JSS	0.90	\$650.00	\$585.00
02/03/2017	Prepare letter to DSLE and related statement of withdrawal of complaint	JSS	0.80	\$650.00	\$520.00
02/03/2017	Finalize letter to DSLE and related statement of withdrawal of complaint	JSS	1.10	\$650.00	\$715.00
02/03/2017	Call with M. Rafique from SolarCity	JSS	0.30	\$650.00	\$195.00
02/05/2017	Finalize and send for signature Thomas Declaration, Statement of Withdrawal, and Notice of Withdrawal and Opposition	JSS	0.90	\$650.00	\$585.00
02/06/2017	Finalize and send Statement of Withdrawal and related correspondence to DLSE and opposing counsel	JSS	0.60	\$650.00	\$390.00
02/07/2017	Finalize notice of withdrawal and opposition and supporting papers for filing this week	JSS	0.60	\$650.00	\$390.00
02/14/2017	Review of documents produced by SolarCity; related correspondence	JSS	0.90	\$650.00	\$585.00
02/15/2017	Correspondence with L. Thomas regarding documents produced by SolarCity and next steps	JSS	0.70	\$650.00	\$455.00
02/17/2017	Call with witness regarding SolarCity policies and practices; related correspondence	JSS	1.30	\$650.00	\$845.00
02/17/2017	Correspondence with M. Rafique regarding DLSE dismissal without prejudice	JSS	0.10	\$650.00	\$65.00
02/20/2017	Correspondence with M. Rafique regarding DLSE dismissal without prejudice; related research	JSS	2.30	\$650.00	\$1,495.00
02/21/2017	Research case law regarding enforceability of commission provisions and agreements	JSS	0.80	\$650.00	\$520.00
02/22/2017	Additional research case law regarding enforceability of commission provisions and agreements	JSS	8.80	\$650.00	\$5,720.00
02/24/2017	Prepare notice of dismissal of DLSE complaint; related correspondence	JSS	0.70	\$650.00	\$455.00
02/26/2017	Prepare complaint against SolarCity	JSS	1.10	\$650.00	\$715.00

02/27/2017	Continue preparing complaint against SolarCity	JSS	6.10	\$650.00	\$3,965.00
02/27/2017	Finalize and file notice of DLSE complaint dismissal	JSS	0.10	\$650.00	\$65.00
02/28/2017	Finalize complaint against SolarCity	JSS	4.60	\$650.00	\$2,990.00
03/02/2017	Prepare for Petition hearing tomorrow afternoon	JSS	2.60	\$650.00	\$1,690.00
03/03/2017	Prepare for and participate in Petition hearing	JSS	3.30	\$650.00	\$2,145.00
03/07/2017	Correspondence with L. Thomas concerning state court hearing and finalizing and filing class action and PAGA action complaints	JSS	0.70	\$650.00	\$455.00
03/08/2017	Finalize PAGA notice letter; prepare to file online and serve tomorrow	JSS	0.40	\$650.00	\$260.00
03/09/2017	Finalize and send PAGA notice letter and file online	JSS	0.30	\$650.00	\$195.00
05/15/2017	Prepare PAGA complaint against SolarCity to be filed in state court	JSS	1.10	\$650.00	\$715.00
05/16/2017	Review and proof PAGA Complaint	DA	0.90	\$225.00	\$202.50
05/17/2017	Call with potential plaintiff/witness Jason Wool; related correspondence	JSS	0.90	\$650.00	\$585.00
05/17/2017	Scan and save notes from telephone conferences with potential class members	DA	0.40	\$225.00	\$90.00
05/19/2017	Final review of PAGA complaint before filing	JSS	0.20	\$650.00	\$130.00
05/22/2017	Prepare multiple request for employment records letters to send to M. Rafique for potential plaintiffs	JSS	0.70	\$650.00	\$455.00
05/22/2017	Analyze documents forwarded by other employees concerning potential employment claims	JSS	3.60	\$650.00	\$2,340.00
05/22/2017	Prepare witness/potential plaintiff intake form for additional employee inquiries	JSS	0.80	\$650.00	\$520.00
05/22/2017	Analyze letter received from M. Rafique concerning compliance with Court Order; related correspondence with M. Rafique	JSS	0.40	\$650.00	\$260.00
05/23/2017	Research arguments concerning filing case against joint employer and scope of order compelling DLSE claims to arbitration	JSS	3.40	\$650.00	\$2,210.00
05/24/2017	Research arguments concerning filing case against joint employer and scope of order compelling DLSE claims to arbitration	JSS	2.80	\$650.00	\$1,820.00
05/24/2017	Correspondence with M. Rafique concerning setting up a call	JSS	0.10	\$650.00	\$65.00
05/24/2017	Research outside and inside sales exemptions re overtime, meals and rest breaks, and commissions	JSS	1.20	\$650.00	\$780.00
05/24/2017	upload documents to be served with Rapid Legal for PAGA Complaint	DA	0.30	\$225.00	\$67.50
05/25/2017	Analyze L. Thomas pay records produced yesterday by M. Rafique	JSS	0.80	\$650.00	\$520.00
05/25/2017	Read emails from OPC and J. Soderstrom and confirm provided pay stubs were saved in matter	DA	0.10	\$225.00	\$22.50

05/29/2017	Research commissions agreements requirements and wages owed to inside and outside sales personnel	JSS	1.40	\$650.00	\$910.00
05/30/2017	Research commissions agreements requirements and wages owed to inside and outside sales personnel	JSS	1.60	\$650.00	\$1,040.00
05/30/2017	Prepare for and hold call with M. Rafique regarding claims and potential motion for sanctions	JSS	0.70	\$650.00	\$455.00
05/31/2017	Phone call and related correspondence with other employees regarding employment documents and potential claims	JSS	0.30	\$650.00	\$195.00
05/31/2017	Analyze case law concerning payment and classification of sales employees	JSS	2.70	\$650.00	\$1,755.00
05/31/2017	Prepare mailings to both defendants of PAGA Complaint and Paga Claim by certified mail	DA	0.40	\$225.00	\$90.00
05/31/2017	Go to post office to mail out PAGA claim form and complaint to defendants	DA	0.30	\$225.00	\$67.50
06/01/2017	Analyze proposed severance agreement and waiver of FLSA claims without a bona fide dispute	JSS	3.50	\$650.00	\$2,275.00
06/02/2017	Analyze ex parte application and related correspondence; prepare opposition to ex parte motion	JSS	4.40	\$650.00	\$2,860.00
06/02/2017	Prepare template for opposition	DA	0.30	\$225.00	\$67.50
06/02/2017	Proofread opposition to ex parte application, update formatting and file with the court	DA	1.60	\$225.00	\$360.00
06/02/2017	Email courtesy copy of opposition to opposing counsel and save into online folder	DA	0.10	\$225.00	\$22.50
06/02/2017	Print directions to court and copies of opposition	DA	0.20	\$225.00	\$45.00
06/03/2017	Prepare for ex parte application hearing by researching law concerning continuing jurisdiction, joint employer liability, PAGA claims, and claim/issue preclusion	JSS	2.30	\$650.00	\$1,495.00
06/05/2017	Prepare for, travel to, and attend ex parte application hearing	JSS	4.30	\$650.00	\$2,795.00
06/05/2017	Correspondence with F. McAlpine concerning potential stipulation re arbitration	JSS	0.40	\$650.00	\$260.00
06/06/2017	Review all emails from J. Soderstrom and OPC on upcoming deadlines and proposals	DA	0.30	\$225.00	\$67.50
06/06/2017	Review online matter for signed proof of service and telephone conference with Rapid Legal to resolve	DA	0.50	\$225.00	\$112.50
06/08/2017	Prepare proof of service for PAGA case and submit for review and approval	DA	0.50	\$225.00	\$112.50
06/09/2017	File proofs of service for complaint and save in matter	DA	0.40	\$225.00	\$90.00
06/09/2017	Enter in all costs for recent filings with the court and process serving	DA	0.30	\$225.00	\$67.50

06/12/2017	Analyze correspondence from SolarCity concerning employee files.	JSS	0.10	\$650.00	\$65.00
06/12/2017	Analyze documents received from SolarCity concerning J. Wool.	JSS	1.70	\$650.00	\$1,105.00
06/13/2017	Correspondence with Wool concerning documents received from SolarCity	JSS	0.20	\$650.00	\$130.00
06/14/2017	Online research related to SolarCity sales website and products	JSS	0.10	\$650.00	\$65.00
06/14/2017	Correspondence with potential plaintiffs/witnesses concerning next steps and employment documents	JSS	0.60	\$650.00	\$390.00
06/15/2017	Call with J. Wool concerning documents and background of claims	JSS	0.50	\$650.00	\$325.00
06/15/2017	Call with F. Kim concerning potential claims and requesting documents from SolarCity; related correspondence	JSS	1.10	\$650.00	\$715.00
06/15/2017	Calendar hearing set for August 11th and follow updates	DA	0.20	\$225.00	\$45.00
06/16/2017	Prepare and send document request for Kim	JSS	0.20	\$650.00	\$130.00
06/19/2017	Research case law regarding misleading settlements during pendency of class action	JSS	0.30	\$650.00	\$195.00
06/23/2017	Review and save employment records for other employees	DA	0.40	\$225.00	\$90.00
06/25/2017	Call with F. McAlpine concerning PAGA case answer and selection of JAMS.	JSS	0.20	\$650.00	\$130.00
06/27/2017	Review online docket and confirm no answer has been filed yet	DA	0.10	\$225.00	\$22.50
06/27/2017	Scan and save notice of arbitration into matter	DA	0.10	\$225.00	\$22.50
06/27/2017	Scan and save waiver of service and calendar deadline	DA	0.10	\$225.00	\$22.50
06/29/2017	Call with J. Wool concerning status and next steps for claims	JSS	0.60	\$650.00	\$390.00
06/29/2017	Read/review the answer and peremptory challenge filed by opposing counsel and save in matter	DA	0.40	\$225.00	\$90.00
06/30/2017	Correspondence with F. McAlpine concerning moving forward with arbitration and filing first amended complaint	JSS	0.20	\$650.00	\$130.00
06/30/2017	Prepare updated PAGA notice letter concerning Thomas	JSS	1.30	\$650.00	\$845.00
07/07/2017	Analyze documents provided by SolarCity re Felicia Kim; related correspondence with F. Kim.	JSS	0.40	\$650.00	\$260.00
07/11/2017	Prepare revised PAGA letter	JSS	0.20	\$650.00	\$130.00
07/11/2017	Prepare demand for arbitration on Thomas's behalf	JSS	3.30	\$650.00	\$2,145.00
07/11/2017	Review docket and confirm peremptory challenge was granted and case reassigned to Casserly	DA	0.10	\$225.00	\$22.50
07/12/2017	Correspondence with L. Thomas regarding preparing arbitration demand and status of cases	JSS	0.20	\$650.00	\$130.00
07/14/2017	Call with F. Kim	JSS	0.30	\$650.00	\$195.00

07/19/2017	Prepare amended PAGA notice	JSS	0.30	\$650.00	\$195.00
07/20/2017	Finalize amended PAGA notice letter	JSS	0.40	\$650.00	\$260.00
07/20/2017	Prepare written discovery to SolarCity Corp in PAGA case	JSS	2.80	\$650.00	\$1,820.00
07/21/2017	Prepare written discovery requests	JSS	1.90	\$650.00	\$1,235.00
07/22/2017	Prepare written discovery requests	JSS	1.70	\$650.00	\$1,105.00
07/24/2017	Prepare written discovery requests	JSS	0.90	\$650.00	\$585.00
07/24/2017	Review discovery being propounded, create proofs of service, scan into system and mail copies. Calendar deadline.	DA	1.50	\$225.00	\$337.50
07/26/2017	Finalize notice of voluntary dismissal as to Les Thomas	JSS	0.20	\$650.00	\$130.00
07/27/2017	Finalize arbitration demand and related documents	JSS	0.80	\$650.00	\$520.00
07/27/2017	File and serve notice of voluntary dismissal as to Thomas's claims; related correspondence with F. McAlpine	JSS	0.20	\$650.00	\$130.00
07/31/2017	File arbitration demand against SolarCity; related correspondence with F. McAlpine	JSS	0.20	\$650.00	\$130.00
08/04/2017	Order minute order from June 5th hearing and email to J. Soderstrom	DA	0.30	\$225.00	\$67.50
08/08/2017	Review local rules and judge burns rules to confirm procedures on motion on regular notice	DA	0.30	\$225.00	\$67.50
08/17/2017	Meet with J. Wool concerning claims of underpayment and next steps in litigation	JSS	1.40	\$650.00	\$910.00
08/17/2017	Review docket, save and update calendared deadlines	DA	0.30	\$225.00	\$67.50
08/21/2017	Analyze answer filed and served by SolarCity in arbitration.	JSS	0.10	\$650.00	\$65.00
08/21/2017	Correspondence with F. McAlpine concerning scheduling brief phone call to discuss next steps	JSS	0.10	\$650.00	\$65.00
08/24/2017	Research law concerning consolidation of cases in connection with PAGA and arbitration	JSS	1.80	\$650.00	\$1,170.00
08/28/2017	Prepare Joint Motion to Continue Motion for Corrective Action hearing; related correspondence	JSS	1.20	\$650.00	\$780.00
08/30/2017	Correspondence with F. McAlpine concerning motion to consolidate meet and confer	JSS	0.60	\$650.00	\$390.00
08/30/2017	Scan notes in from August 17th in office meeting with Jason Wool	DA	0.10	\$225.00	\$22.50
09/01/2017	Analyze motion to transfer and consolidate filed today	JSS	0.60	\$650.00	\$390.00
09/01/2017	Analyze motion to transfer and consolidate filed today	JSS	0.60	\$650.00	\$390.00
09/06/2017	Call with F. Kim	JSS	0.30	\$650.00	\$195.00
09/06/2017	Call with J. Wool	JSS	0.30	\$650.00	\$195.00

09/07/2017	Analyze motion to consolidate filed again by SolarCity	JSS	0.20	\$650.00	\$130.00
09/12/2017	Update Opposition to Motion to Compel with J. Soderstrom notes and file all documents with the court	DA	0.30	\$225.00	\$67.50
09/14/2017	Review amended claims letter and date mailed to the DIR; Update calendar with deadline	DA	0.30	\$225.00	\$67.50
09/15/2017	Prepare form interrogatories general and employment to propound on both defendants for J. Soderstrom's review	DA	0.90	\$225.00	\$202.50
09/15/2017	Update form interrogatories with changes requested by J. Soderstrom and finalize	DA	0.40	\$225.00	\$90.00
09/15/2017	Prepare mailing of discovery to SolarCity	DA	0.30	\$225.00	\$67.50
09/17/2017	Prepare draft stipulated protective order; related correspondence with F. McAlpine	JSS	1.90	\$650.00	\$1,235.00
09/20/2017	Analyze discovery responses from SolarCity; related correspondence with opposing counsel	JSS	1.40	\$650.00	\$910.00
09/20/2017	Analyze law concerning coordination of PAGA cases	JSS	0.70	\$650.00	\$455.00
09/20/2017	Analyze briefing schedule concerning motion for corrective action; related call to court clerk	JSS	0.30	\$650.00	\$195.00
09/20/2017	Correspondence with plaintiffs' counsel in Irving re petition for consolidation	JSS	0.20	\$650.00	\$130.00
09/20/2017	Review application filed by A. Irving and save in matter	DA	0.30	\$225.00	\$67.50
09/20/2017	Review and scan discovery responses received from Defendants and email J. Soderstrom re missing responses	DA	0.50	\$225.00	\$112.50
09/21/2017	Call with plaintiffs' counsel in Irving regarding coordinating cases	JSS	0.90	\$650.00	\$585.00
09/21/2017	Research concerning coordinating cases	JSS	0.60	\$650.00	\$390.00
09/21/2017	Docket review of state case and the Irving docket	DA	0.40	\$225.00	\$90.00
09/21/2017	Telephone conference with the Judicial Council Clerk re status of Irving Petition Hearing Date	DA	0.40	\$225.00	\$90.00
09/22/2017	Review Form Roggs mailing date and update calendar with deadline	DA	0.20	\$225.00	\$45.00
09/29/2017	Correspondence with A. Sanchez re meet and confer next week	JSS	0.10	\$650.00	\$65.00
10/02/2017	Correspondence with F. McAlpine concerning meet and confer call	JSS	0.10	\$650.00	\$65.00
10/02/2017	Analyze potential arbitrators circulated by JAMS	JSS	0.70	\$650.00	\$455.00
10/03/2017	Analyze SolarCity's discovery responses; research case law concerning waiver of untimely objections	JSS	2.70	\$650.00	\$1,755.00
10/04/2017	Prepare meet and confer letter re four sets of written discovery to SolarCity	JSS	3.80	\$650.00	\$2,470.00

10/04/2017	Proof and finalize letter to opposing counsel re meet and confer re discovery	DA	0.60	\$225.00	\$135.00
10/13/2017	Analyze motion for stay filed by SolarCity	JSS	0.40	\$650.00	\$260.00
10/13/2017	Review Motion to Stay and Set for Arbitration, save in matter and calendar response dates	DA	0.30	\$225.00	\$67.50
10/17/2017	Prepare motion to compel discover and separate statement re SolarCity Corp RFPs	JSS	1.10	\$650.00	\$715.00
10/18/2017	Prepare motion and separate statement concerning SolarCity Corp's responses to RFPs	JSS	3.10	\$650.00	\$2,015.00
10/18/2017	Prepare motion and separate statement concerning SolarCity Finance's responses to RFPs	JSS	1.50	\$650.00	\$975.00
10/20/2017	Prepare motion and separate statement concerning SolarCity Corp's responses to special interrogatories	JSS	0.90	\$650.00	\$585.00
10/20/2017	Prepare motion and separate statement concerning SolarCity Corp's responses to RFPs	JSS	0.60	\$650.00	\$390.00
10/20/2017	Research re motion for corrective action; related correspondence with J. Wakefield	JSS	0.60	\$650.00	\$390.00
10/23/2017	Prepare motion to compel further responses to RFPs by SolarCity Corp.	JSS	1.30	\$650.00	\$845.00
10/24/2017	Prepare motion to compel further responses re SolarCity Corp. RPFs	JSS	1.80	\$650.00	\$1,170.00
10/24/2017	Prepare motion to compel further responses to SolarCity Finance RFPs	JSS	0.40	\$650.00	\$260.00
10/24/2017	Prepare motion to compel further responses to SolarCity Finance Interrogatories	JSS	0.50	\$650.00	\$325.00
10/24/2017	Prepare declaration in support of motion to compel further responses re SolarCity Corp. RFPs	JSS	2.90	\$650.00	\$1,885.00
10/24/2017	Review discovery responses, discuss with J. Soderstrom and determine the deadlines to file motions to compel	DA	0.40	\$225.00	\$90.00
10/24/2017	Review emails regarding new plaintiffs and a request to file an amended complaint	DA	0.20	\$225.00	\$45.00
10/30/2017	Prepare motions to compel discovery and separate statements	JSS	3.10	\$650.00	\$2,015.00
10/31/2017	Final review of motions in preparation for filing	JSS	0.30	\$650.00	\$195.00
10/31/2017	Continue preparing exhibits and converting word versions of motions to compel (4) and supporting documents	DA	3.20	\$225.00	\$720.00
11/01/2017	Finalize proofs of service, proposed orders, OCR all PDF's and insert bookmarks for all four motions and supporting documents; file with the court and e-serve	DA	2.70	\$225.00	\$607.50
11/02/2017	Prepare opposition to motion to transfer and consolidate	JSS	0.20	\$650.00	\$130.00
11/02/2017	Download receipts for motions to compel and enter expenses into matter	DA	0.20	\$225.00	\$45.00

11/03/2017	Call with J. Wool concerning case updates and settlement talks	JSS	0.40	\$650.00	\$260.00
11/03/2017	Correspondence with S. Leviant concerning case strategies	JSS	0.10	\$650.00	\$65.00
11/03/2017	Calendar all deadlines related to Motions to Compel	DA	0.30	\$225.00	\$67.50
11/03/2017	Save all filed motions to compel and supporting documents in matter	DA	0.20	\$225.00	\$45.00
11/04/2017	Prepare mediation brief re Irving/Thomas mediation	JSS	2.30	\$650.00	\$1,495.00
11/04/2017	Analyze SolarCity Corporation's opposition to petition for coordination	JSS	0.70	\$650.00	\$455.00
11/04/2017	Prepare request for judicial notice re SolarCity Corporation's opposition to petition for coordination	JSS	0.60	\$650.00	\$390.00
11/07/2017	Prepare motion to compel responses re form interrogatories - employment	JSS	1.80	\$650.00	\$1,170.00
11/07/2017	Scan and email responses to Form Interrogatories to JS	DA	0.30	\$225.00	\$67.50
11/08/2017	Finalize motion to compel responses to form interrogatories - employment	JSS	0.20	\$650.00	\$130.00
11/08/2017	Voicemail for judge's calendaring clerk to obtain a hearing date for a motion to compel responses to employment form interrogatories	DA	0.20	\$225.00	\$45.00
11/08/2017	Update motion to compel responses to employment form interrogatories and all supporting documents and prepare exhibits for filing	DA	1.10	\$225.00	\$247.50
11/09/2017	Update and file motion to compel and all supporting exhibits with the court	DA	1.80	\$225.00	\$405.00
11/10/2017	Call with Setarah; related correspondence with OPC	JSS	0.30	\$650.00	\$195.00
11/11/2017	Correspondence with L. Thomas re mediation tomorrow	JSS	0.10	\$650.00	\$65.00
11/15/2017	Call with S. Setareh re claims and mediation strategy	JSS	1.50	\$650.00	\$975.00
11/15/2017	Update general and employment interrogatories for 3 plaintiffs with additional questions	DA	1.90	\$225.00	\$427.50
11/15/2017	Find and print case management statement	DA	0.10	\$225.00	\$22.50
11/16/2017	Call and related correspondence with M. Rafique re Jason Wool and mediation	JSS	0.30	\$650.00	\$195.00
11/16/2017	Phone call with counsel from SolarCity and email sent to J. Soderstrom relaying message	DA	0.10	\$225.00	\$22.50
11/16/2017	Prepare case management statement per notes from J. Soderstrom	DA	0.70	\$225.00	\$157.50
11/17/2017	Correspondence and call with F. McAlpine re CMC; finalizing CMC statement	JSS	1.10	\$650.00	\$715.00
11/17/2017	Finalize case management statement, file it with the court and serve to opposing counsel	DA	0.90	\$225.00	\$202.50
11/20/2017	Analyze notice of assignment of coordination judge filed by Irving	JSS	0.20	\$650.00	\$130.00

11/21/2017	Call with J. Wool re case status and issues at SolarCity	JSS	0.30	\$650.00	\$195.00
11/21/2017	Review and revise opposition to motion to transfer and preparation for filing	DA	0.50	\$225.00	\$112.50
11/22/2017	Prepare opposition to motion to transfer	JSS	1.50	\$650.00	\$975.00
11/22/2017	Prepare opposition to motion for stay	JSS	1.10	\$650.00	\$715.00
11/22/2017	Review updated opposition to motion to transfer and prepare proof of service	DA	0.60	\$225.00	\$135.00
11/22/2017	Review order setting hearing and calendar upcoming deadlines on petition for coordination	DA	0.20	\$225.00	\$45.00
11/27/2017	Finalize opposition to motion to transfer	JSS	0.40	\$650.00	\$260.00
11/27/2017	Prepare opposition to motion to stay and compel arbitration	JSS	4.40	\$650.00	\$2,860.00
11/27/2017	Revise opposition in preparation for filing	DA	0.40	\$225.00	\$90.00
11/28/2017	Review, download and save conformed copies of order assigning hearing date for motion for coordination	DA	0.20	\$225.00	\$45.00
11/30/2017	Revise opposition to motion to stay in preparation for filing	DA	0.50	\$225.00	\$112.50
11/30/2017	Prepare and revise proof of service for opposition to motion to stay to include all counsel for defendants	DA	0.30	\$225.00	\$67.50
11/30/2017	Review local rules for San Mateo Superior Court complex division and contact court clerk	DA	0.70	\$225.00	\$157.50
12/01/2017	Prepare opposition to motion to stay and compel arbitration	JSS	1.80	\$650.00	\$1,170.00
12/01/2017	Research and prepare response in support of petition for coordination	JSS	1.20	\$650.00	\$780.00
12/01/2017	Set up court call for telephonic appearance at case management conference	DA	0.20	\$225.00	\$45.00
12/01/2017	File response to petition for coordination with the court and prepare and mail service copies	DA	1.60	\$225.00	\$360.00
12/06/2017	Telephone conference to M. Dickstein to obtain mediation hearing details; email to J. Soderstrom re details	DA	0.20	\$225.00	\$45.00
12/09/2017	Correspondence with other plaintiff's counsel Setareh	JSS	0.10	\$650.00	\$65.00
12/11/2017	Call with S. Setareh re coordinating claims against SolarCity	JSS	0.40	\$650.00	\$260.00
12/14/2017	Correspondence with mediator Dickstein	JSS	0.20	\$650.00	\$130.00
02/23/2018	Analyze and comment on draft agreements which provide that J. Wool and F. Kim can be added as plaintiffs in the Thomas Action	JSS	2.10	\$650.00	\$1,365.00
03/08/2018	Analyze Coordination order re meet and confer, CMS, and discovery obligations	JSS	0.40	\$650.00	\$260.00
03/08/2018	Prepare letter brief re discovery issues; related correspondence with Irving counsel	JSS	2.20	\$650.00	\$1,430.00

03/09/2018	Meet and confer call regarding CMS and four discovery motions	JSS	0.90	\$650.00	\$585.00
03/11/2018	Prepare discovery letter brief	JSS	0.40	\$650.00	\$260.00
03/12/2018	Meet and confer call with Irving and SolarCity counsel; related correspondence with Irving counsel re case management statement	JSS	0.90	\$650.00	\$585.00
03/12/2018	Finalize discovery letter brief	JSS	0.30	\$650.00	\$195.00
03/13/2018	Analyze CMS and discovery letter emailed by SolarCity	JSS	0.40	\$650.00	\$260.00
03/19/2018	Travel to and from and attend CMC and discovery conference	JSS	9.50	\$650.00	\$6,175.00
04/04/2018	Correspondence and edits re MOU	JSS	0.40	\$650.00	\$260.00
04/08/2018	Correspondence with OPC re notice or stipulation	JSS	0.30	\$650.00	\$195.00
04/09/2018	Revise proposed stipulation; related correspondence with OPC	JSS	0.50	\$650.00	\$325.00
04/24/2018	Correspondence and call with mediator	JSS	0.80	\$650.00	\$520.00
05/04/2018	Correspondence with OPC re notice of settlement	JSS	0.10	\$650.00	\$65.00
05/08/2018	Correspondence with OPC re notice or stipulation	JSS	0.30	\$650.00	\$195.00
05/08/2018	Revise proposed stipulation; related correspondence with OPC	JSS	0.50	\$650.00	\$325.00
05/14/2018	Call with mediator re attorneys fees	JSS	0.50	\$650.00	\$325.00
05/15/2018	Finalize MOU and obtain client signatures	JSS	0.30	\$650.00	\$195.00
05/16/2018	Call with Jason Wool re settlement terms	JSS	0.60	\$650.00	\$390.00
05/30/2018	Analyze notice to court and prepare comments in advance of filing with court	JSS	0.20	\$650.00	\$130.00
05/31/2018	Call with V. Rivapalacio re court notice; related correspondence re court notice	JSS	0.20	\$650.00	\$130.00
06/14/2018	Correspondence with J. Wool re new layoffs and terms of settlement	JSS	0.80	\$650.00	\$520.00
07/16/2018	Analyze and make changes to proposed settlement agreement	JSS	0.90	\$650.00	\$585.00
07/23/2018	Prepare declaration in support of settlement	JSS	0.80	\$650.00	\$520.00
12/20/2018	Prepare declaration ISO motion for final approval	JSS	1.30	\$650.00	\$845.00
12/21/2018	Prepare declaration for Wool and Kim ISO motion for final approval	JSS	0.60	\$650.00	\$390.00
				Services Subtotal	\$143,877.50

Expenses

Date	Notes	Attorney	Quantity	Rate	Total
05/19/2017	Filing fee for PAGA Complaint	JSS	1.00	\$435.00	\$435.00

05/30/2017	Personal service of Summons and Complaint for SolarCity Corporation and SolarCity Financial Company, LLC	JSS	1.00	\$126.00	\$126.00
08/01/2017	JAMS Arbitration Filing Fee	DA	1.00	\$400.00	\$400.00
09/20/2017	Postage for mailing discovery to Defendants	DA	1.00	\$1.67	\$1.67
11/01/2017	Filing fees for 4 Motions to Compel and supporting documents	DA	1.00	\$240.00	\$240.00
11/09/2017	One Legal fee for filing and service of 4 Motions to Compel Discovery and supporting documents	DA	1.00	\$60.00	\$60.00
11/14/2017	Postage for mailing discovery to Defendants	DA	1.00	\$1.64	\$1.64
12/01/2017	Postage for mailing response in support of petition for coordination to all 7 parties	DA	1.00	\$6.16	\$6.16
12/04/2017	Court Filing of Response in support of petition for coordination service fee	DA	1.00	\$51.95	\$51.95
12/07/2017	CourtCall fee for appearing by phone at the Irving Hearing on petition for coordination set for December 15th	DA	1.00	\$86.00	\$86.00
12/08/2017	CourtCall fee for telephonic appearance at Case Management Conference	DA	1.00	\$86.00	\$86.00
12/08/2017	Flight expense to attend mediation	DA	1.00	\$266.40	\$266.40
12/12/2017	Uber fees from airport to office	DA	1.00	\$10.67	\$10.67
12/12/2017	Uber fees from mediation to airport	DA	1.00	\$11.77	\$11.77
12/12/2017	Uber fees from office to John Wayne Airport to travel to mediation	DA	1.00	\$8.24	\$8.24
12/12/2017	Uber fees for transportation from San Francisco airport to mediation	DA	1.00	\$38.85	\$38.85
03/19/2018	Transportation fee from office to John Wayne Airport to attend case management hearing	DA	1.00	\$8.99	\$8.99
03/19/2018	Transportation costs from San Francisco airport to case management conference	DA	1.00	\$35.08	\$35.08
03/19/2018	Transportation costs from John Wayne Airport to office after attending case management conference	DA	1.00	\$10.97	\$10.97

Expenses Subtotal \$1,885.39

Time Keeper	Position	Quantity	Rate	Total
Jamin Soderstrom	Attorney	209.2	\$650.00	\$135,980.00
Diana Alderete	Non-Attorney	35.1	\$225.00	\$7,897.50
			Subtotal	\$145,762.89
			Total	\$145,762.89