

1 **THE MARKHAM LAW FIRM**

David R. Markham (SBN 071814)

2 dmarkham@markham-law.com

Lisa Brevard (SBN 323391)

3 lbrevard@markham-law.com

888 Prospect Street, Suite 200

La Jolla, CA 92037

5 Telephone: (619) 399-3995/Facsimile: (619) 615-2067

6 Attorneys for Plaintiffs PHILLIP BERNAL and TRUHILL NOEL, on behalf of themselves
and all others similarly situated

7 *[Additional Counsel listed on following page]*

8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF SAN BERNARDINO**

10 PHILLIP BERNAL, TRUHILL NOEL,
11 KHYELL MARTIN, DAMIEN
12 MCNORTON, WADDIE EARNEST,
13 GILBERT ESTRADA, CARMEN
HERNANDEZ, and WENDY QUINTERO,
individually, on behalf of themselves and all
others similarly situated,

14 Plaintiffs,

15 v.

16
17 EXPRESS MESSENGER SYSTEMS, INC.,
dba ONTRAC, a Minnesota Corporation,
18 ONTRAC LOGISTICS, INC., a Delaware
Corporation, and DOES 2-10, Inclusive,

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20 Defendants.
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Case No. CIVSB2319614

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Joseph Ortiz

Department S-17

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF DAVID R. MARKHAM IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: July 21, 2026

Time: 1:30 p.m.

Dept. S-17

Complaint filed: August 15, 2023

Trial date: Not set

1 **UNITED EMPLOYEES LAW GROUP**

2 Walter Haines (SBN 71075)

3 walter@uelglaw.com

4 8605 Santa Monica Blvd., #63354

5 West Hollywood, CA 90069

6 Telephone: (562) 256-1047/Facsimile: (562) 256-1006

7 **COHELAN KHOURY & SINGER**

8 Isam C. Khoury (SBN 58759)

9 ikhoury@ckslaw.com

10 Michael D. Singer (SBN 115301)

11 msinger@ckslaw.com

12 Maggie K. Realin (SBN 263639)

13 mrealin@ckslaw.com

14 605 C Street, Suite 200

15 San Diego, CA 92101

16 Telephone: (619) 595-3001/Facsimile: (619) 595-3000

17 Attorneys for Plaintiffs PHILLIP BERNAL and TRUHILL NOEL

18 **HAIG B. KAZANDJIAN LAWYERS, APC**

19 Haig B. Kazandjian (SBN 278622)

20 haig@hbklawyers.com

21 Cathy Gonzalez (SBN 310625)

22 cathy@hbklawyers.com

23 Melissa Robinson (SBN 336951)

24 melissa@hbklawyers.com

25 801 North Brand Boulevard, Suite 970

26 Glendale, CA 91203

27 Telephone: (818) 696-2306/Facsimile: (818) 696-2307

28 Attorneys for Plaintiff KHYELL MARTIN

29 **CROSNER LEGAL, PC**

30 Zachary M. Crosner (SBN 272295)

31 zach@crosnerlegal.com

32 Chad A. Saunders (SBN 257810)

33 chad@crosnerlegal.com

34 9440 Santa Monica Blvd. Suite 301

35 Beverly Hills, CA 90210

36 Telephone: (866) 276-7637/Facsimile: (310) 510-6429

37 Attorneys for Plaintiff DAMIEN MCNORTON

1 **AEGIS LAW FIRM, PC**

Kashif Haque (SBN 218672)

2 khaque@aegislawfirm.com

3 Jessica L. Campbell (SBN 280626)

jcampbell@aegislawfirm.com

4 Samuel A. Wong (SBN 217104)

swong@aegislawfirm.com

5 9811 Irvine Center Drive, Suite 100

Irvine, CA 92618

6 Telephone: (949) 379-6250 2024/Facsimile: (949) 379-6251

7 Attorneys for Plaintiff GILBERT ESTRADA

8 **LAWYERS for JUSTICE, PC**

9 Arby Aiwazian (SBN 269827)

10 aa@calliustice.com

Joanna Ghosh (SBN 272479)

11 joanna@calljustice.com

Yasmin Hosseini (SBN 326399)

12 yasmin@calljustice.com

450 N. Brand Blvd., Suite 900

13 Glendale, CA 91203

14 Telephone: (818) 265-1020/Facsimile: (818) 265-1021

15 Attorneys for Plaintiff WADDIE EARNEST

16 **WILSHIRE LAW FIRM**

17 Tyler Woods (SBN 232464)

tyler.woods@wilshirelawfirm.com

18 James Yoo (SBN 310680)

james.yoo@wilshirelawfirm.com

19 660 S. Figueroa Street, Sky Lobby

20 Los Angeles, CA 90017

Telephone: (213) 381-9988/Facsimile: (213) 381-9989

21 Attorneys for Plaintiff CARMEN HERNANDEZ and WENDY QUINTERO

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1 we obtained a settlement fund of over \$665 million for the benefit of new California residents
2 who registered their out-of-state vehicles and were unlawfully charged the \$300 smog impact fee.
3 *Jordan v. California Dep't of Motor Vehicles*, 100 Cal. App. 4th 431, 440, (2002), as modified on
4 denial of reh'g (Aug. 20, 2002). In *Sparks v. AT&T et al.*, a settlement fund of over \$350 million
5 was obtained for consumers nationwide who had been overcharged for residential telephone
6 equipment. Case No. 96-LM-983, 01-L-1668 (Ill. Cir. Ct., Madison County).

7 5. My firm's settlements also include *Conteras v. Bank of America*, where we
8 reached a settlement fund of over \$16.5 million (San Francisco Superior Court, Case No. CGC-
9 07467749, Sept. 3, 2010). In *Nelson v. St. Paul Fire and Marine Insurance Company*, we reached
10 a settlement of \$24.5 million (Case No. 95-G-1088 Brazoria County, Texas, 1996). Further, we
11 settled *Zwart v. John Hancock Mutual Life Insurance Company* for \$3 million (Case No. 673902,
12 San Diego Superior Court, 1995). Other California wage and hour settlements in cases where I
13 was lead counsel include *Friend v. Wellpoint / Blue Shield*, Case No. BC345147 (Los Angeles
14 Super. Ct., Aug. 22, 2007) which settled for \$6 million, and *Gruender v. American Title Co.*,
15 Case No. 06CC0197 (Orange County Superior Court, 2008), which settled for \$11 million.

16 6. More recent wage and hour settlements that my firm has reached include a
17 \$8,000,000 settlement in *XESP v. BF Borgers CPA PC et al.*, Case No. 2024CV030771, District
18 Court of the State of Colorado, finally approved on December 11, 2025; a \$11,000,000 settlement
19 in *Robertson v. Amazon*, Case No., 3:14-md-2504-DJH, United States District Court for the
20 Western District of Kentucky, finally approved on December 23, 2024; a \$11,500,000 settlement
21 in *Harrison v. Bank of America*, Case No. 3:19-cv-00316-LB, United States District Court for the
22 Northern District of California, finally approved on November 24, 2021; a \$4,600,000 settlement
23 in *Vasquez v. Bank of America*, Case No. CGC-18-571669, San Francisco Superior Court, finally
24 approved on July 29, 2022; a \$1,200,000 settlement in *Townsend v. Maxim*, Case No. 22-CV-
25 005450, Alameda Superior Court, finally approved on December 4, 2025; an average settlement
26 share of over \$2,000 per employee in *Young v. PFT Alexander*, Case No. 23STCV07449, Los
27 Angeles Superior Court, finally approved on March 25, 2026; a \$665,000 settlement in *Gibson v.*
28 *Ross*, Case No. 23CV048864, Alameda Superior Court, finally approved on December 12, 2025;

1 a \$1,375,000 settlement in *Diaz et al. v. United Parcel Service, Inc.*, United States District Court
2 for the Eastern District of California, Case No. 1:22-cv-00246-CDB, finally approved on
3 December 13, 2023; a \$24,000,000 global settlement in *Esteban v. American Airlines*, Case No.
4 20STCV47361, Los Angeles Superior Court, finally approved on April 26, 2024; a \$2,000,000
5 settlement in *Stewart v. Del Monte*, Case No. 1:22-CV-04919-RMI, United States District Court
6 for the Northern District of California, finally approved on May 29, 2024; a \$2,900,000
7 settlement in *Swayzer et al. v. Circle K*, Case No. 34-2018-00234999, Sacramento Superior
8 Court, finally approved on February 18, 2022; a \$1,000,000 settlement in *Scott v. Sutter*, Case
9 No. CVUJ-2022-1146, Del Norte Superior Court, finally approved on April 25, 2025; a \$775,000
10 settlement in *Ward v. Sutter*, Case No. 34-2020-00279954-CU-OE-GDS, Sacramento Superior
11 Court, finally approved on January 10, 2025; a \$ 975,000 settlement in *Shaw v. Kaiser*
12 *Foundation Health Plan, Inc.*, Case No. CVRI2102203, Riverside Superior Court, finally
13 approved on January 10, 2024; a \$750,000 settlement in *Almanzar v. Home Depot U.S.A., Inc.*,
14 Case No. 2:20-cv-00699-KJN, United States District Court for the Eastern District of California,
15 finally approved on January 3, 2024; a \$750,000 settlement in *Delamora, et al. v. Thorpe Design*
16 *, Inc.*, Case No. C22-00931, Contra Costa Superior Court, finally approved on October 2, 2023; a
17 \$800,000 settlement in *Slaughter v. California C.C.S. P.C., dba Wellpath*, Case No.
18 CIVDS1935187, San Bernardino Superior Court, finally approved on May 6, 2022; a \$750,000
19 settlement in *Antenucci v. Bank of the West*, Case No. CGC-20-583746, San Francisco Superior
20 Court, finally approved on December 7, 2022, a \$1,000,000 settlement in *Kelly v. Simco*
21 *Electronics*, Case No. 20CV370177, Santa Clara Superior Court, finally approved on January 19,
22 2022; a \$5,900,000 settlement in *Hurtubise v. Sutter East Bay Hospitals*, Case No. RG17868819,
23 Sacramento Superior Court, finally approved on December 27, 2021; a \$825,000 settlement in
24 *Fritsch et al. v. Swift Transportation Co.*, Case No. 5:17-cv-02226-VAP-KKx, United States
25 District Court for the Central District of California, finally approved on January 4, 2022; a \$1.62
26 million PAGA-only Settlement in *Moreno, et al. v. Habit Employment, LP, et al.*, Case No. 37-
27 2019-00014576-CU-OE-CTL, San Diego Superior Court, approved on September 10, 2021; a
28 \$2,295,000 settlement in *Veramendi v. Airtouch Cellular Inc., et al.*, Case No. BC647309, Los

1 Angeles Superior Court, finally approved on June 3, 2021; a \$438,000 settlement in *Valdez v. Pro*
2 *Unlimited, Inc., et al.*, Case No. CGC-19-574146, San Francisco Superior Court, finally approved
3 on May 10, 2021, an average settlement share of \$5,511.11 per employee in *Hopstein v. Hewlett*
4 *Packard Enterprise Company (d.b.a. HPE), et al.*, Case No. 17CV305577, Santa Clara Superior
5 Court, finally approved on December 2, 2020; an average settlement share of \$1,139.71 per
6 employee in *Cuevas v. Three Rivers Trucking, Inc.*, Case No. BC655003, Los Angeles Superior
7 Court, finally approved on July 29, 2020; a \$1.2 million class and PAGA representative action
8 settlement in *Hernandez et al. v. SFM, LLC*, Case No. 37-2016-00015169, San Diego Superior
9 Court, finally approved on July 21, 2020 (aff'd March 16, 2022); \$8.7 million settlement in
10 *Evans v. Wal-Mart Stores, Inc.*, Case No. 2:10-cv-1224, United States District Court for the
11 District of Nevada, finally approved on July 8, 2020 (Dkt. No. 135); \$35 million settlement in
12 *Merino v. Wells Fargo*, Case No. 2:16-cv-07840-ES-MA, United States District Court for the
13 District of New Jersey, finally approved on January 15, 2020 (Dkt. No. 144); an average
14 settlement share of \$1,317.31 per employee in *Angala v. Kaiser Foundation Hospitals*, Case No.
15 HG18899291, Alameda County Superior Court, finally approved on January 13, 2020; \$600,000
16 settlement in *Hoover v. Sedgwick Claims Management Services, Inc.*, Case No. 34-2018-
17 00239159, Sacramento Superior Court, finally approved on December 6, 2019; \$950,000
18 settlement in *Bessellieu v. Metro Shore Services, LLC, et al.*, Case No. BC6737001, Los Angeles
19 Superior Court, finally approved on May 21, 2019; \$1.6 million settlement in *Jenkins v. The*
20 *Mentor Network, Inc., et al.*, Case No. 34-2015-00187936, Sacramento Superior Court, finally
21 approved on September 13, 2018; \$27.5 million settlement in *Wells Fargo Wage and Hour*
22 *Cases*, Case No. JCCP004821, Alameda County Superior Court, finally approved on March 28,
23 2018; \$2.5 million settlement in *Geilenfeldt v. EDF Renewable Energy, Inc.*, Case No. 37-2016-
24 00001369, San Diego Superior Court, finally approved on March 9, 2018; \$3 million settlement
25 in *Vangsoulatda v. Blue Shield*, Case No. CGC-14-543296, San Francisco County Superior
26 Court, finally approved on January 25, 2018; \$650,000 settlement in *McCarthy v. Marriott Hotel*
27 *Services, Inc.*, Case No. 16-cv-293998, Santa Clara Superior Court, finally approved on October
28 16, 2017; \$4.9 million settlement for insurance adjusters in *Alvarez v. Farmers*, case number

3:14-cv-00574-WHO, finally approved on January 18, 2017 by Judge Orrick (Dkt. No. 189); \$3.77 million settlement for California warehouse workers in *Saldana v. Amazon*, case number 3:14-cv-00290-DJH (W.D. Ky.), finally approved on October 31, 2016 (Dkt. No. 228).

7. My other recent California wage and hour settlements also resulted in substantial recoveries for class members. For instance, I settled *Kogok v. T-Mobile USA, Inc.*, Case No. 37-2012-00076945 (San Diego Super. Ct. Jan. 2015) for \$2,750,000; *Johnson v. Metlife Ins. Co.*, Case No. 13-cv-128-JLS-RNB (C.D. Cal. Mar. 19, 2015) for \$1,970,000; *Erickson v. Old Republic Title Company*, Case No. 13-cv-1210-NLS, (S.D. Cal. Feb. 10, 2016) for \$970,000 plus payroll taxes; *Campagna et al. v. Language Line Services, Inc.*, Case No. 30-2012-00578934-CU-OE-CXC (Orange County Superior Court, Mar. 14, 2014) for \$900,000; *Anderson et al. v. Oracle Corp.*, Case No. CIV469916/JCCP No. 4597 (Alameda Super. Ct., June 2013) for \$850,000; *McDonagh v. Harrah's Las Vegas, Inc., et al.*, Case No. 13-cv-01744 (United States District Court for the District of Nevada, Dec. 13, 2016), for \$850,000.

8. I have also been counsel and argued numerous appellate cases in the California Supreme Court and Courts of Appeal, as well as the Ninth Circuit. Among the published decisions from these cases are: *Daniels v. Philip Morris*, 18 F.Supp.2d 1110 (S.D. Cal. 1998); *Washington Mutual Bank v. Super. Ct.*, 24 Cal.4th 906 (2001); *Northwest Mortgage Inc. v. Super. Ct.*, 72 Cal.App. 4th 214 (1999); *Taiheiyo Cement Corp. v. Super. Ct.*, 105 Cal.App. 4th 398 (2003); *Ramos v. Countrywide Home Loans*, 82 Cal.App.4th 615 (2000); *In re Tobacco II*, 123 Cal.App.4th 617 (2004); *In re Steroid Hormone Prod. Cases*, 181 Cal.App.4th 145 (2010).

9. In total, I have prosecuted over 250 wage-and-hour class actions.

10. Any attorneys' fees awarded in this matter will be allocated 39.6% to Bernal's counsel, 14.85% to Martin's counsel, 14.85% to McNorton's counsel, 14.85% to Estrada's counsel, 14.85% to Earnest's counsel, and 1 % to Hernandez's counsel. Of Bernal's share, 16.33% will be allocated to The Markham Law Firm, 33.33% to United Employees Law Group, and 50.34% to Cohelan Koury & Singer. Our clients have consented to this fee allocation in writing

1 11. My firm has prosecuted this litigation solely on a contingent-fee basis, and has
2 been completely at risk that it would not receive any compensation for prosecuting claims against
3 the Defendant.

4 12. The Markham Law Firm's billing for time and costs in this case includes time
5 billed for investigating the claims and drafting pleadings, law and motion practice, attending
6 mediation, reviewing documents and researching legal authorities, and extensive communications
7 and meetings among the parties and counsel. This billing has been prepared from
8 contemporaneous time and bookkeeping records, attached as **Exhibit 1**.

9 13. At the Markham Law Firm, the usual and customarily charged rates of attorneys
10 are: David R. Markham, \$815, Lisa Brevard, \$500, and \$175 for the firm's paralegals. These
11 rates are consistent with the prevailing rates for attorneys of similar experience, skill and
12 reputation, are in line with the market rates in various California legal communities, and were
13 recently approved by several California state and federal courts, including on March 25, 2026 by
14 the Los Angeles Superior Court in *Young v. PFT Alexander*, Case No. 23STCV07449; on
15 December 4, 2025 by the Alameda Superior Court in *Townsend v. Maxim*, Case No. 22-CV-
16 005450; on December 12, 2025 by the Alameda Superior Court in *Gibson v. Ross*, Case No.
17 23CV048864; on April 25, 2025 by the Del Norte Superior Court in *Scott v. Sutter*, Case No.
18 CVUJ-2022-1146¹; on January 10, 2025 by the Sacramento Superior Court in *Ward v. Sutter*,
19 Case No. 34-2020-00279954-CU-OE-GDS, on October 2, 2023, by the Contra Costa Superior
20 Court in *Delamora, et al. v. Thorpe Design, Inc.*, Case No. C22-00931; on December 7, 2022, by
21 San Francisco Superior Court in *Antenucci v. Bank of the West*, Case No. CGC-20-583746; on
22 July 29, 2022, by San Francisco Superior Court in *Vasquez v. Bank of America*, Case No. CGC-
23 18-571669; on May 26, 2022 by Fresno Superior Court in *Moya v. St. Agnes Medical Center*,
24 Case No. 20CECG00975; on May 6, 2022 by San Bernardino Superior Court in *Slaughter v.*
25 *California CCS, P.C.*, Case No. CIVDS1935187; on January 19, 2022 by Santa Clara Superior
26 Court in *Kelly v. Simco*, Case No. 20CV370177; on January 4, 2022 by the United States District
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¹ The rate for Ms. Brevard has increased from \$400 to \$500 as an attorney with 7 years of experience in wage and hour class actions.

1 Court for the Central District of California in *Fritsch et al. v. Swift Transportation Co. of*
2 *Arizona*, Case No. 5:17-cv-02226-VAP-KKx; on December 27, 2021 by Sacramento Superior
3 Court in *Hurtubise v. Sutter*, Case No. RG17868819; on November 24, 2021 by the United States
4 District Court for the Northern District of California in *Harrison v. Bank of America*, Case No.
5 3:19-cv-00316-LB; and on September 10, 2021 by San Diego Superior Court in *Moreno, et al. v.*
6 *Habit Employment, LP, et al*, Case No. 37-2019-00014576-CU-OE-CTL.

7 14. I have devoted 23.6 hours to the prosecution of this action. We will also incur
8 additional billable time to prepare for and attend the settlement approval hearing, and oversee the
9 settlement administration.

10 15. My former partner, Maggie Realin, devoted 9.6 hours to the prosecution of this
11 action while at my firm.

12 16. My firm's associate, Lisa Brevard, devoted 64.9 hours to the prosecution of this
13 action. Ms. Brevard is a graduate of the University of California, Los Angeles, and University of
14 San Diego School of Law. She received her J.D., summa cum laude, and was admitted to the
15 California Bar in 2018. During law school, Ms. Brevard interned at the USD Appellate Clinic,
16 where she presented oral argument before the Ninth Circuit Court of Appeals. She was an active
17 participant on the University of San Diego Appellate Moot Court Board and competed in regional
18 and national competitions. Additionally, she gained legal experience on corporate and litigation
19 matters as a law clerk and summer associate for a national firm. Since joining my firm in May
20 2019, Ms. Brevard has focused on representing employees in wage and hour class actions.

21 17. My firm's paralegal (and former paralegal during the time that she was employed
22 at my firm), meet the qualifications and continuing education requirements set forth in Business
23 & Professions Code § 6450. My firm's paralegals collectively spent 55.6 hours on this action.

24 18. To prosecute this action, my firm incurred \$4,422.16 in costs. These costs and
25 expenses identified in my firm's costs summary are reflected in the accounting books and records
26 that my law firm maintains in the ordinary course of business, and are prepared from expense
27 records, credit card receipts and statements, and check records. These expenses were necessary
28 for this litigation and include the amounts paid for court filing fees, mediator fees, and service of

1 process charges, all of which are costs normally billed to and paid by the client. These costs were
2 reasonably incurred in the prosecution of this matter and are authorized by the Settlement
3 Agreement.

4 19. I have no conflicts of interest with the class members in this action. I am not
5 related to the named Plaintiffs. I have not previously represented Defendant in any matter.

6 20. The Settlement Agreement in this action is the result of vigorous and competent
7 representation of Plaintiffs, and arms'-length, contentious negotiations with Defendant to reach
8 the best possible outcome for the Class. Having analyzed the facts and legal theories of this case,
9 and based on my experience in litigating similar representative wage and hour claims, I believe
10 that the proposed settlement is fair, reasonable and adequate for the Class, and warrants approval.

11 I declare under penalty of perjury under the laws of California and the United States of
12 America that the foregoing is true and correct to the best of my knowledge.

13 Executed on June 17, 2026, in La Jolla, California.

14
15 By: _____

16 David R. Markham
17 Attorney for Plaintiff
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Exhibit 1

THE MARKHAM LAW FIRM
Reported Hours, Lodestar, and Costs

NAME	POSITION	TOTAL HOURS	HOURLY RATE	LODESTAR
ATTORNEYS				
David R. Markham	P	23.6	\$815.00	\$19,234.00
Maggie Realin	P	9.6	\$700.00	\$6,720.00
Lisa R. Brevard	A	64.9	\$500.00	\$32,450.00
ATTORNEY TOTAL:		98.1		\$58,404.00

PARALEGALS

Leeanna D. Carcione	PL	32.3	\$175.00	\$5,652.50
Noor Haleem	PL	23.3	\$175.00	\$4,077.50
PARALEGAL TOTAL:		55.6		\$9,730.00
GRAND TOTAL:		153.7		\$68,134.00

(P) Partner

(A) Associate

(PL) Paralegal

Expense Charges	\$4,422.16
Subtotal:	\$4,422.16
TOTAL:	\$4,422.16

Bernal et al. v. Express Messenger Systems, Inc.; Case No. CIVSB2319614

Date	Service	Description	Amount
6/26/2023	Doc Fee	Fee to pull doc for case research	\$2.00
8/21/2023	One Legal	Invoice #14814224	\$1,626.61
8/24/2023	One Legal	Credit Card Sale_05261621	\$92.66
9/12/2023	One Legal	Credit Card Sale_05310000	\$92.66
9/15/2023	One Legal	Credit Card Sale_05321582	\$87.51
9/15/2023	One Legal	Credit Card Sale_05321789	\$87.51
9/18/2023	One Legal	Credit Card Sale_05326290	\$92.66
9/20/2023	One Legal	Invoice #14898218	\$41.18
11/15/2023	One Legal	Credit Card Sale_05498195	\$18.62
11/21/2023	One Legal	Credit Card Sale_05513525	\$51.48
11/21/2023	One Legal	Credit Card Sale_05513528	\$51.48
12/6/2023	One Legal	Credit Card Sale_05551747	\$18.62
		Fee to pull related case	
12/18/2023	Doc Fee	complaint	\$10.60
		Fee to purchase related case	
1/29/2024	Doc Fee	complaint	\$10.50
		E-Serve Charge 10 recipients -	
1/30/2024	One Legal	22122617-R1	\$10.00
2/16/2024	One Legal	Credit Card Sale_05745955	\$10.30
2/29/2024	One Legal	Credit Card Sale_05783057	\$175.22
		Purchase complaints for related	
6/21/2024	Doc Fee	case	\$20.00
		Purchase complaints for related	
6/21/2024	Doc Fee	case	\$10.60
		Memo of Points and Authorities	
6/24/2024	Doc Fee	for Estrada related case matter	\$9.95
		Order to continue stay of Rep	
6/24/2024	Doc Fee	PAGA, related case	\$5.40
		Fee for downloading complaint/	
	LA register of	Receipt Number: PA-2024-	
9/6/2024	Actions	283226444	\$13.80
9/17/2024	SB Docket	Stip and Order	\$3.00
3/24/2025	Mediation	Mediation fee	\$1,875.00
	Register of		
5/19/2026	Actions	Download order for PA	\$4.80
		Total	\$4,422.16

David Markham, Esq., Founding Partner (\$815/hr; admitted 1976)

Date	Task	Time
7/5/2023	Prospective case call; follow-up call with MR	0.8
7/7/2023	Review legal research; call with MR	0.4
7/28/2023	Review intake & emails re call	0.2
7/28/2023	Call w/ prospective client & LB	0.2
8/2/2023	Review complaint	0.1
9/22/2023	Review complaint, emails exchange with MR	0.2
9/27/2023	Review interview notes, email exchange with MR	0.2
10/23/2023	Review emails w/ defense/co-counsel	0.2
12/18/2023	call w/ MR re related cases	0.2
11/8/2023	Emails re service	0.1
1/9/2024	Emails w/ defense re M&C call	0.1
1/12/2024	Emails w/ LB & MR re CMC statement	0.1
1/29/2024	Review memo re Medline case	0.2
1/30/2024	Calls w/ LB & MR re Medline order	0.2
2/14/2024	Review discovery requests	0.1
3/11/2024	Review MTC	0.2
3/15/2024	Emails w/ LB re MTC	0.1
4/10/2024	Review order re related cases	0.1
4/19/2024	Review defendant discovery responses	0.1
5/24/2024	Review briefing & cases for agency argument; save research	0.1
5/28/2024	Calls/emails re ruling; review re same	0.7
5/29/2024	Calls/emails re hearing	0.5
6/7/2024	Review email from defense re meet & confer call	0.1
6/19/2024	Emails w/ MR & LB re meet & confer prep	0.2
6/19/2024	Call w/ MR & LB prior to call w/ defense	0.6
6/19/2024	Call w/ MR, LB & defense counsel	0.4
6/19/2024	Follow-up call w/ MR & LB re meet & confer	0.4
6/24/2024	Emails w/ MR/LB re summary re review related case documents	0.1
6/24/2024	Call w/ MR & LB re related cases	0.2
6/25/2024	Emails w/ MR & LB re related cases; email defense re MTC	0.3
6/25/2024	Calls w/ MR/LB; review emails w/ defense	0.2
6/25/2024	Emails w/ MR & LB; call w/ LB re review related case docs	0.2
6/26/2024	Call w/ LB re call w/ defense	0.1
6/27/2024	Meet & confer call w/ defense, MR & LB	0.3

6/27/2024	Pre-call w/ MR & LB re M&C	0.2
7/15/2024	Email LB re status of letter to LC	0.1
7/16/2024	Email w/ LB re review notice from LC	0.1
7/17/2024	Call w/ LB re call w/ defense	0.1
7/19/2024	Call w/ counsel in other pending cases & LB	0.5
7/19/2024	Messages w/ LB re pending cases	0.1
7/19/2024	Call w/ LB re related case call	0.1
8/14/2024	Review time & payroll data produced by defense	0.1
9/18/2024	Emails w/ LB re intake	0.1
12/5/2024	Emails re JPA	0.1
1/2/2025	Review email from defense re call; emails w/ MR & LB & defense	0.2
2/4/2025	Review emails re mediation	0.1
3/19/2025	Review emails re expert analysis	0.1
3/21/2025	Review expert analysis for mediation	0.3
3/24/2025	Prepare for mediation/review final mediation brief/calls & emails re same	2.5
3/25/2025	Pre-mediation call	0.3
3/25/2025	All day mediation (9am-5pm)	8
3/26/2025	Review mediator's proposal	0.1
3/29/2025	Emails re mediator proposal	0.2
4/15/2025	Call w/ LB & MR re admins	0.1
8/12/2025	Review MOU	0.3
8/13/2025	Review emails re MOU; call w/ LB	0.1
8/13/2025	Emails w/ LB re MOU	0.1
8/13/2025	Review emails re MOU	0.1
8/21/2025	Call w/ LB	0.1
9/10/2025	Call w/ LB	0.1
9/23/2025	Review edits to SA	0.1
11/12/2025	Review draft of my declaration iso PA	0.2
2/19/2026	Review emails re tentative ruling	0.1
2/26/2026	Review SA; emails w/ LB re timeline	0.1
6/17/2026	Review final approval and fee motion draft	0.4
est	Review finalized final approval/fee motion & my declaration prior to filing	0.3
Total		23.6

Maggie Realin, Esq., Former Partner (\$700/hr; admitted 2009)

Date	Task	Time
7/5/2023	call with prospective client re claims	0.5
7/5/2023	call with DRM re prospective case	0.3
7/5/2023	review earlier PAGA settlement	0.6
7/7/2023	legal research re interstate commerce issue, call with DRM	1.6
8/1/2023	review and edit complaint	1.1
8/1/2023	email exchange with LB re edits to complaint	0.2
9/22/2023	review complaint, email exchange with DRM	0.3
9/27/2023	review interview notes, email exchange with DRM	0.3
10/17/2023	review notice re non-service, review email exchange from LB re same	0.2
10/23/2023	review email from opposing counsel re case	0.1
12/18/2023	research re related cases	1.2
12/18/2023	call w/ DRM re related cases	0.2
1/12/2024	call with defense and LB re CMC	0.2
1/12/2024	review draft CMC statement	0.4
1/12/2024	review complaint, prepare for CMC meet and confer	0.5
1/29/2024	review D's edits to cmc statement	0.2
	review order in Medline case denying motion to compel arbitration;	
1/29/2024	draft memo	1.4
1/29/2024	review D's notice of related cases	0.2
1/30/2024	review notice of posting jury fees	0.1
	Total	9.6

Lisa Brevard, Esq., Associate Attorney (\$500/hr; admitted 2018)

Date	Task	Time
7/28/2023	Review intake & emails re call	0.2
7/28/2023	Call w/ prospective client & DRM	0.2
7/31/2023	Review & edit notes from call w/ add'l perspective rep	0.2
8/1/2023	Call & emails w/ MR re new complaint/add'l client	0.1
8/2/2023	Review complaint w/ MR redline & client notes; email MR	0.3
8/2/2023	Review complaint	0.3
8/4/2023	Review & edit complaint with OT claim; email MR	0.7
9/26/2023	Messages re add'l prospective client & call	0.1
9/27/2023	Review notes from add'l prospect; meet w/ MR and discuss	0.2
10/13/2023	Review notice re service; emails & call w/ MR	0.3
10/18/2023	Review amended complaint & rules re Doe defendant	0.2
10/19/2023	Review & edit class action complaint; email MR	0.3
10/23/2023	Review emails w/ defense/co-counsel	0.2
11/8/2023	Emails re service	0.1
11/15/2023	Review POS for filing	0.1
11/17/2023	Review D/L; email re POS	0.1
1/2/2024	Email defense re meet & confer call; email MR	0.2
1/8/2024	Email; call w/ MR re next steps	0.2
1/9/2024	Emails w/ defense re M&C call	0.1
1/11/2024	Prepare draft CMC statement/review case law prior to meet & confer call	0.7
1/12/2024	Prepare draft CMC statement/review case law prior to meet & confer call	0.9
1/12/2024	Meet & confer call w/ MR & defense counsel	0.2
1/12/2024	Follow-up emails w/ DRM & MR; email re defense statement; call w/ MR	0.5
1/29/2024	Review defendant edits to CMC statement; email MR & DRM	0.2
1/30/2024	Email defense re final CMC statement	0.1
1/30/2024	Review finalized CMC statement for filing today	0.1
1/30/2024	Call w/ MR re oppo to MTC	0.1
1/30/2024	Review order re MTC in related <i>Medline</i> case	0.2
1/30/2024	Calls w/ DRM & MR re Medline order	0.2
2/5/2024	Check docket re MTC filing/DLs	0.1
2/13/2024	Messages w/ MR re status conference	0.1
2/13/2024	Review docket; calendar; email MR	0.2
2/14/2024	Attend status conference; call w/ MR & emails re next steps	0.6
2/14/2024	Review discovery requests	0.2
2/19/2024	Review D/L to respond to discovery; confirm calendar	0.1
3/6/2024	Call w/ MR re arbitration motion	0.2
3/11/2024	Call w/ MR re MTC; review email from MR re motion	0.1
3/11/2024	Review MTC	0.6
3/12/2024	Email MR re MTC	0.1
3/12/2024	Review emails re MTC	0.1
3/15/2024	Emails w/ DRM re MTC	0.1
3/22/2024	Call w/ MR re oppo	0.1
3/25/2024	Call w/ MR re oppo	0.1
4/10/2024	Review order re related cases	0.1

4/10/2024	Review email from MR re oppo	0.1
4/17/2024	Emails re scheduling call w/ client	0.1
4/17/2024	Emails re call w/ client	0.1
4/19/2024	Review defendant discovery responses; emails w/ MR	0.3
4/25/2024	Review oppo brief & declaration for call w/ client	0.2
4/25/2024	Call w/ MR & client	0.4
4/25/2024	Prepare for call w/ client	0.2
4/25/2024	Call w/ MR & client	0.3
4/25/2024	Review clients' declarations; review labor claim	0.2
5/16/2024	Call w/ MR; emails re hearing	0.1
5/21/2024	Review our oppo & defendant's reply brief	0.3
5/23/2024	Call w/ MR re hearing prep; check docket & review briefing	0.2
5/23/2024	Call w/ MR & emails re notice of errata	0.2
5/24/2024	Review briefing & cases for agency argument; save research	0.1
5/27/2024	Review agency argument & draft section; edit and email MR	1.2
5/28/2024	Check for tentative ruling; calls re same	0.5
5/29/2024	Re-review tentative; review case law	0.4
5/29/2024	Prepare & attend hearing	1
6/4/2024	Review notice re ruling; email w/ MR re discovery	0.1
6/4/2024	Review emails w/ MR & calendar D/L to petition for arbitration	0.1
6/5/2024	Review discovery requests & email MR	0.2
	Research re discovery of multiple defendants; review ROGS &	
6/5/2024	emails w/ MR	0.4
6/7/2024	Review email from defense re meet & confer call; emails w/ MR	0.3
6/10/2024	check docket; email MR	0.2
6/12/2024	Emails re rescheduling meet & confer call	0.1
6/19/2024	Emails w/ MR & DRM re meet & confer prep; prepare for call	0.8
6/19/2024	Call w/ MR & DRM prior to call w/ defense	0.6
6/19/2024	Review hearing transcript; emails w/ MR re transcript	0.6
6/19/2024	Call w/ MR, DRM & defense counsel	0.4
6/19/2024	Follow-up call w/ MR & DRM re meet & confer	0.4
6/21/2024	Emails re notice of related cases	0.1
6/24/2024	Review petition for arb; email MR	0.1
6/24/2024	Review related case documents; email MR/DRM re summary	0.4
6/24/2024	Call w/ MR & DRM re related cases	0.2
6/25/2024	Emails w/ MR & DRM re related cases; email defense re MTC	0.3
	Calls w/ MR/DRM; review emails w/ defense; emails w/ MR &	
6/25/2024	defense	0.5
6/25/2024	Review related case docs; email MR & DRM; call w/ DRM	0.4
	Review email from MR re related case; call w/ DRM re call w/	
6/26/2024	defense	0.1
	Review updated case chart; emails & messages re add'l related	
6/26/2024	case	0.2
	Prep for meet & confer call w/ defense counsel; emails/messages	
6/27/2024	re next steps	0.2
6/27/2024	Meet & confer call w/ defense, MR & DRM	0.3
6/27/2024	Pre-call w/ MR & DRM re M&C	0.2
7/10/2024	Review email from defense; MR	0.1

Emails w/ co-counsel re LC claims; prepare letter & email co-	
7/15/2024 counsel	0.7
7/15/2024 Email DRM re status	0.1
7/16/2024 Review notice from LC; save to file/email defense; email w/ DRM	0.4
7/17/2024 Call w/ DRM re call w/ defense	0.1
7/18/2024 Emails w/ defense counsel re arb tolling extension/MTC	0.2
7/19/2024 Review related cases chart prior to call w/ plaintiffs' counsel	0.1
7/19/2024 Call w/ counsel in other pending cases & DRM	0.5
7/19/2024 Messages w/ DRM re pending cases	0.1
7/19/2024 Call w/ DRM re related case call	0.1
8/14/2024 Review time & payroll data produced by defense	0.1
8/16/2024 Review email from plaintiffs' counsel; email MR	0.2
8/19/2024 Review CMC deadline; email to defense	0.1
8/21/2024 Review CMC statement; emails w/ MR & defense	0.3
8/21/2024 Further edit CMC statement; email defense	0.2
8/22/2024 Review CMC statement for filing; emails w/ defense & MR	0.2
Emails & messages re scheduling call w/ defense; preparing	
8/23/2024 related cases chart/mediation date	0.3
8/26/2024 Emails re scheduling call	0.1
9/9/2024 Emails w/ MR re arb D/L and <i>Estrada</i>	0.1
9/17/2024 Review Estrada docket & stip/order re stay	0.1
9/17/2024 Email MR re stip/order re stay in <i>Estrada</i>	0.1
9/18/2024 Review intake; email DRM	0.1
11/7/2024 Review JPA & email MR	0.2
11/7/2024 Review notes from call with class member; email MR	0.3
12/5/2024 Emails re JPA	0.1
1/2/2025 Review email from defense re call; email MR & DRM & defense	0.2
1/15/2025 Emails between counsel	0.1
Call w/ MR; messages w/ DRM re next steps; review emails from	
1/15/2025 counsel	0.3
1/23/2025 Emails w/ MR re data analysis	0.2
1/30/2025 Call w/ MR re call with Wilshire counsel; status	0.2
2/4/2025 Review emails re mediation	0.1
2/11/2025 Call w/ MR re expert analysis; emails re experts	0.1
2/18/2025 Emails w/ MR re expert call	0.1
2/20/2025 Call w/ expert & MR	0.3
2/20/2025 Follow-up call and emails w/ MR re expert analysis	0.1
2/21/2025 Emails w/ MR re expert	0.1
2/24/2025 Call w/ expert & MR	0.2
2/26/2025 Call w/ MR re expert analysis	0.1
3/5/2025 Respond to expert email re questions; emails w/ MR	0.5
3/5/2025 Emails re scheduling call	0.1
3/7/2025 Review email from client; calendar pre mediation call	0.1
3/7/2025 Emails w/ MR; review emails from expert re mediation analysis	0.3
3/10/2025 Review prior to call w/ MR & defense	0.1
3/10/2025 Call w/ defense & co-counsel re mediation	0.2
3/10/2025 Follow-up call w/ MR	0.2

3/11/2025	Call w/ client Bernal & MR; messages re call	0.2
3/11/2025	Call w/ client Truhill & MR	0.4
3/11/2025	Review client notes prior to calls w /clients	0.1
3/11/2025	Emails re scheduling call w/ expert	0.1
3/13/2025	Call w/ MR; emails re expert call	0.1
	Calls w/ MR re data analysis; review expert analysis & emails re	
3/17/2025	same	0.8
3/17/2025	Call w/ MR & expert re data analysis	0.5
	Emails/messages re data analysis & review updated mediation	
3/17/2025	brief; email MR re same	0.8
3/17/2025	Review company policies produced	0.3
	Emails w/ MR re updated data analysis; review brief & emails;	
3/18/2025	call w/ MR	0.6
3/19/2025	Emails re expert analysis	0.2
3/20/2025	Emails re scheduling call w/ defense	0.1
3/20/2025	Call w/ defense & experts; follow-up emails	0.5
3/21/2025	Review mediation data analysis; email MR	0.1
3/24/2025	Call w/ co-counsel re mediation call	0.3
3/24/2025	Call w/ co-counsel & defense	0.3
3/24/2025	Call w/ client & MR	0.5
3/24/2025	Review CMC statement	0.1
3/24/2025	Prep for mediation; emails & calls re same	1.5
3/25/2025	Pre-mediation call w/ co-counsel	0.3
3/25/2025	All day mediation (9am-5pm)	8
3/26/2025	Review & save mediator's proposal; calendar D/L	0.1
	Call w/ MR re mediator's proposal; emails between counsel re	
3/26/2025	same	0.1
3/29/2025	Review emails re mediator proposal	0.1
3/31/2025	call w/ MR re MOU & incentives	0.2
4/3/2025	Emails w/ MR re MOU	0.1
4/7/2025	Review MOU & email MR	0.8
4/8/2025	Call w/ MR re CMC; emails re settlement	0.4
4/9/2025	Calls w/ MR re MOU; review emails re same	0.5
4/15/2025	Call w/ DRM & MR re admins; review bid & email MR	0.1
4/21/2025	Call w/ MR re call w/ client; review prior emails; messages	0.3
4/22/2025	Review emails re call to client re settlement	0.1
5/27/2025	Review MR comments to MOU	0.1
7/8/2025	Review draft CMC statement; email MR	0.1
7/15/2025	Email co-counsel re status of MOU	0.1
7/22/2025	Review order continuing CMC	0.1
7/29/2025	Review prior edits to MOU to prepare for call w/ defense re MOU	0.1
7/29/2025	Call w/ MR & defense w/ MOU; follow-up emails/calls	0.5
7/30/2025	Email co-counsel re update	0.1
8/4/2025	Emails w/ MR re MOU	0.1
8/6/2025	Emails w/ MR re consolidation motion	0.2
8/12/2025	Emails re MOU	0.1
8/12/2025	Messages w/ co-counsel re update to client	0.1
8/13/2025	Emails re MOU; call w/ DRM	0.1

	8/13/2025 Email DRM re MOU; review email to client	0.1
	8/13/2025 Emails/messages between counsel re released claims	0.1
	8/13/2025 Review proposed redline to MOU	0.1
	8/13/2025 Emails re MOU	0.2
	8/14/2025 Review email re prior claim; draft email to client	0.1
	8/20/2025 Emails re SA/stipulation	0.1
	8/21/2025 Call w/ DRM	0.1
	8/21/2025 Review edits to settlement agreement; emails w/ MR	0.2
	9/10/2025 Messages re communication w/ client	0.1
	9/10/2025 Call w/ DRM	0.1
	9/23/2025 Review edits to SA; emails re CMC	0.2
	9/23/2025 Emails/messages w/ MR re CMC	0.3
	9/24/2025 Prepare for CMC	0.3
	9/24/2025 Attend CMC	0.8
	9/24/2025 Call w/ MR; emails re PA & calendar dates	0.4
	11/12/2025 Draft WH & DRM declarations; email re same	0.9
	11/13/2025 Email co-counsel re WH & DRM declarations	0.2
	12/9/2025 Review emails re filing	0.1
	1/5/2026 Check docket & for tentative ruling	0.1
	2/5/2026 Call w/ MR; emails re settlement dec	0.2
	2/9/2026 Review supplemental dec; email MR	0.1
	2/19/2026 Emails re tentative ruling; FA hearing date	0.2
	2/26/2026 Review SA; email DRM re timeline	0.1
	5/7/2026 Review fee motion templates; email MR	0.1
	5/8/2026 Review final approval & fee motion draft	0.4
	5/8/2026 Review VM from class member	0.1
	5/10/2026 Review VM from class member; email co-counsel re same	0.1
	5/11/2026 Return call of class member w/ MR; text message	0.1
	5/26/2026 Review CM voicemails; forward VM to NH	0.4
	5/27/2026 Review notice; return voicemails to 2 class members	0.3
	6/10/2026 Review and edit WH & DRM declarations; exhibit	0.8
est	Review finalized final approval/fee motion prior to filing	0.5
est	Prep to attend FA hearing	3
est	Review tentative; prepare & attend FA hearing	2
Total		64.9

Leeanna Carcione, Paralegal (\$175/hr)

Date	Task	Time
6/26/2023	prospective case research	0.5
6/27/2023	additional case research; email to team	0.3
7/20/2023	make case file; work on draft complaint	0.5
7/21/2023	continue draft complaint	2.3
7/24/2023	edit draft complaint	1.9
7/25/2023	continue draft complaint; email from review	1.3
7/26/2023	edit draft complaint	0.4
7/31/2023	save intake and notes for additional rep	0.2
7/31/2023	edit complaint to add second rep	1.9
8/1/2023	text to MKR re complaint draft	0.1
8/1/2023	edit complaint per MKR	0.3
8/2/2023	return signed rep agreement; email to UELG	0.1
8/2/2023	add OT claim re LRB email	0.7
8/7/2023	call to client re complaint; VM and email	0.1
8/7/2023	call from client re complaint	0.1
8/7/2023	review email from DRM re edits to complaint; further edit review further edits to complaint; finalize and send to clients	0.2
8/7/2023	for review; edit numbering	0.6
8/8/2023	review and respond to email from client re complaint save client email re approval on complaint; follow up with w/ client	0.1
8/9/2023	review and respond to email from MKR re client approval on complaint	0.1
8/10/2023	call to pl re complaint	0.1
8/11/2023	save client approval on complaint	0.1
8/11/2023	call with client re complaint; email re same	0.2
8/14/2023	draft case initiating docs small edit on complaint and submit for filing and order service of process	0.4
8/14/2023	of process	0.4
8/18/2023	review status of complaint filing and service; email to LRB	0.1
8/23/2023	finalize certificate of assignment and email to MKR	0.1
8/23/2023	file certificate save cc of complaint and docs to file; calendar Trial setting	0.2
8/23/2023	conference statement due date	0.3
8/24/2023	save cc of certificate of assignment to file review unsuccessful service attempt for complaint; forward to MKR and LRB	0.1
8/25/2023	review email from LRB re entity; search again for active entity; email to LRB	0.2
8/25/2023	check other case re service of process	0.3
9/12/2023	save non-service pos to file	0.1
9/12/2023	research re service of process; submit for serving on CT corp	0.3
9/13/2023	review successful service of process	0.1
9/13/2023	calendar d/l to answer; email to LRB re same	0.1
9/15/2023	save cc of POS to file	0.1
9/25/2023	save client's new phone number	0.1

review and respond to email from LRB re POS of summons	
9/26/2023 filed	0.1
9/27/2023 prospective additional client call	0.4
10/17/2023 reseach re entity; call with LRB re same; email findings	0.2
10/17/2023 further edit amended complaint	0.3
edit complaint to add doe defendant; research re how to add	
10/17/2023 Doe defendant; email to MKR and LRB with question	0.6
10/18/2023 further edits to FAC; email to LRB	0.2
draft summons for doe def; research re amended summons for	
10/18/2023 Doe def.	0.3
10/18/2023 further edit FAC re Doe def	1.1
10/19/2023 finalize complaint for filing and email to LRB	0.1
10/19/2023 file FAC; email to LRB re same	0.4
check on status of filing of FAC on one legal; check client	
10/23/2023 notes; email to MKR	0.2
10/24/2023 save client new phone number and email to file	0.1
check filing of FAC; check One Legal; call to civil office;	
email to MKR and LRB (40 mins on hold); calc and calendar	
10/31/2023 meet and confer deadline; review complex guidelines	0.9
11/6/2023 check docket and one legal for status	0.2
11/7/2023 further attempt to call clerk's office; email to team re same	0.1
review email from LRB re status; call to clerk re FAC; email	
11/7/2023 to LRB re same	0.5
11/8/2023 call civil office re FAC; email to LRB re same	0.6
check status of conformed amended complaint; review agent	
11/13/2023 for service for added entity; email to LRB re same	0.2
11/14/2023 order service of process	0.4
11/15/2023 email to LRB re POS	0.1
11/15/2023 email courtesy copies to defense	0.1
11/15/2023 file POS's	0.2
11/15/2023 review POS of summons; save to file; email to LRB re same	0.6
11/17/2023 calendar d/l to answer FAC	0.1
11/21/2023 check docket	0.1
save notice of rejected service of process; email to LRB re	
12/1/2023 same	0.1
12/6/2023 save conformed FAC to file	0.1
12/6/2023 check docket re case status	0.1
12/11/2023 check docket	0.1
12/14/2023 save answer to file; review answer	0.1
12/18/2023 save notice of related cases; pull complaints	0.3
12/18/2023 search for additional PAGA case; email to MKR re same	0.3
1/4/2024 check docket re status of case	0.1
1/4/2024 save client arbitration agreements to file	0.1
1/9/2024 calendar call	0.1
1/12/2024 add info re related case to CMC statement	0.2
1/29/2024 pull docket for additional related case; pull complaint	0.3
1/29/2024 save related case notice of related case filing to file	0.1
check status of appeal in case for research; download docket;	
1/29/2024 email to MKR	0.2

1/30/2024	save joint cmc statement	0.1
1/30/2024	check docket re jury fees; prep notice of jury fee deposit	0.4
1/30/2024	finalize notice re jury fees; file and serve; email serve	0.4
1/30/2024	review website re remote appearances; email memo to LRB	0.2
1/30/2024	pull docs for research; save website job ads for evidence	0.2
1/31/2024	call to clerk re remote appearance; email re same	0.2
	review and respond to email from MKR re reserving	
2/6/2024	appearance	0.1
2/6/2024	further email re appearance at CMC	0.1
2/8/2024	save MKR notice of remote app	0.1
2/12/2024	apply DRM sig on notice of association	0.1
2/14/2024	text with MKR re discovery drafts	0.1
	add discovery requests to pleading paper; edit re definitions;	
2/14/2024	email to MKR	0.9
2/14/2024	further edits to discovery	0.1
2/15/2024	save related case docs	0.1
2/15/2024	confirm calendar entry re CMC	0.1
2/16/2024	check statutes; finalize discovery requests; draft POS	0.6
2/16/2024	serve discovery requests; calendar responses	0.4
2/21/2024	save minute order to file	0.1
2/21/2024	pull complaint and docket in related case	0.2
2/21/2024	save related case docs	0.1
3/1/2024	save notice of posting jury fees to file	0.1
	save MTC to file; calculate and calendar oppo and reply and	
3/6/2024	hearing date	0.2
	save email re e-service to file; update date for discovery	
3/7/2024	responses on calendar	0.1
3/20/2024	download reply iso MTC for research; email to MKR	0.1
3/27/2024	save oppo to MTC to file	0.1
4/9/2024	save Pl's damage calcs	0.1
4/9/2024	email to LRB re JPA	0.1
4/10/2024	save pls' decl iso oppo to MTC to file	0.1
4/10/2024	save minute orders relating cases to file	0.1
4/11/2024	email to LRB re signatures on JPA	0.1
	review email re pl's decls; text to plaintiffs re scheduling call;	
4/17/2024	email to MKR re same	0.2
	call to client re setting phone call; calendar call and send JPA;	
4/17/2024	text re same	0.2
4/17/2024	text to client	0.1
	save signed JPA to file; compile sigs and add DRM sig; email	
4/17/2024	to co-counsel	0.1
4/19/2024	save draft RJN to file	0.1
	save discovery responses to file; save MKR summary to file;	
4/19/2024	calendar MTC deadline	0.1
4/25/2024	send decl to client in SR	0.1
4/25/2024	save notes from client call	0.1
4/25/2024	save notes from 2nd client call	0.1
	Total	32.3

Noor Haleem, Paralegal (\$175/hr)

Date	Task	Time
5/16/2024	Call with LB re remote appearance for upcoming hearing; call with court clerk re upcoming hearing; email to attorney on same	0.5
5/28/2024	Call with San Bernardino court re tentative ruling and messages with LB on same	0.2
5/29/2024	Review and calendar deadlines after conference and emails with LB on same.	0.2
5/31/2024	Receive and download errata declaration	0.1
6/7/2024	Save/review discovery requests and calendar response time	0.2
6/10/2024	Review emails re conference meeting and confirm calendaring on calendar	0.1
6/11/2024	Emails with LB re upcoming meeting	0.1
6/21/2024	Work on reference chart; emails with LB on same; save docs on file from all related cases	4
6/21/2024	Review related cases register of actions and download; email to LB on same	0.4
6/24/2024	Review and save transcripts from hearing, email to LB on same	0.2
6/24/2024	Review emails re petition re arbitration	0.1
6/24/2024	Retrieve & review documents re related cases and email to LB on same	0.8
6/25/2024	Download & review Order Denying Mtn to Compel and email to LB on same	0.2
6/25/2024	Review meet and confer email	0.1
6/25/2025	Review register of actions and download related case docs for attorney LB; emails with LB on same	0.2
6/25/2024	Email with LB re the meet and confer attendance	0.1
6/26/2024	Update calendar re discovery responses deadline and emails with LB on same	0.2
6/26/2024	Update chart, download complaint for related case and M&P&A; emails with Maggie and Lisa on same	0.5
7/10/2024	Review emails re potential mediation	0.1
7/12/2024	Review emails re status	0.1
7/15/2024	Mailing of Letter to Dept of Labor; email to Labor Dept on same	0.4
7/16/2024	Receive and forward emails from dept of labor to attorneys	0.2
7/16/2024	Confirm download of docs from dept of labor; emails on same	0.2
7/19/2024	Calendar new individual claims deadline and email to LB on same	0.2
7/19/2024	Calendar new deadlines on MTC	0.2
8/9/2024	Calendar discovery deadline for def.	0.2
8/22/2024	Review and save Case Management Stmt; email to LB on same	0.2
8/23/2024	Review emails re upcoming mediation	0.2
8/23/2024	Emails with co-counsel's paralegal re global data	0.1
8/23/2024	Calendar mediation date; email to LB on same	0.1
8/23/2024	Confirm on calendar re defense call	0.1
8/29/2024	Receive and download mediation documents; email to LB on same	0.2
9/5/2024	Save mediation/settlement documents on file, email to LB on same	0.2
9/11/2024	Review extended deadlines, confirm on calendar, email to LB on same	0.1
9/12/2024	Review emails on continuance to motion to compel; confirm on calendar	0.2

9/17/2024	Review related case Estrada v. Ontrac and email to LB on same	0.2
12/19/2024	Receive and review JPA and save on file	0.1
5/22/2025	Save clients' new address on file, email LB on same	0.1
10/30/2025	Receive, review, and save order re stip for leave file SAC and stipulation, email to LB	0.1
3/20/2025	Review and sign mediation agreement, email to mediator on same	0.2
3/20/2025	Receive, review, and save mediation brief on file	0.1
3/24/2025	Email mediator re payment confirmations	0.1
3/24/2025	Email case information	0.2
3/25/2025	Complete mediation agreement and return to mediator	0.2
3/25/2025	Save new client number on file	0.1
4/4/2025	Check ROA re continuance of hearing, email to Amber on status	0.2
7/22/2025	Receive/download order contin dates, calendar upcoming dates, email to LB on same	0.2
7/22/2025	Download, save, and email notice of entry of order	0.1
7/23/2025	Calendar upcoming conference call between attys	0.1
1/6/2025	Review correspondence from co-counsel re mediation	0.1
2/26/2025	Receive, review, and sign the JPA agreement, email to Amber on same	0.2
2/26/2025	Calendar upcoming mediation prep w client, confirm with LB on same	0.1
3/7/2025	Confirm conference meeting calendaring, save client's new number, email to LB on same	0.1
6/20/2025	Calendar mediation conference call	0.1
8/13/2025	Send agreement to client	0.1
8/18/2025	Save new MOU; send judge rules to atty re deadline	0.1
8/21/2025	Calendar dates on notice of entry of order, email to LB on same, save on file	0.1
9/19/2025	Save new client's contacts	0.1
11/20/2025	Save order and sac on file, email LB on same	0.2
12/9/2025	Save conformed second amended complaint on file, emails w/ LB on same	0.1
12/11/2025	Save all docs for PA, email to LB on same	0.2
1/5/2026	Check for tentative ruling	0.1
1/6/2026	Check for tentative ruling, email to LB	0.2
1/7/2026	Review email from co-counsel maggie; calendar dates for PA hearing, emails w/ LB	0.2
1/8/2026	Save notice of contin. and POS, email to LB on same	0.1
2/24/2026	Review and calendar dates for FA based on tentative ruling, email to LB on same	0.2
2/27/2026	Calendar admin deadlines, email to LB on same	0.2
4/13/2026	Emails with LB re time change on the hearing	0.1
4/13/2026	Check docket	0.1
4/27/2026	Review voice msgs and call class members on same	0.6
6/10/2026	Draft DRM dec. & exhibit 1, emails w/ LB & DRM on same	6
	est. Further revise dec. & finalize, emails w/ LB on same	0.5
	est. Review and save final filed docs on file, email to LB on same	0.1
	est. Check for tentative rulings, emails w/ attys on same	0.2
	Total	23.3