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Attorney for Plaintiffs
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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF VENTURA, UNLIMITED JURISDICTION

CARMEN MINA SUAREZ, CECILIA
DOLORES MARTINEZ, ALFONSO
MALDONADO SANTIAGO, MARGARITA
LOPEZ HERNANDEZ, LORENZO ROMERO
RODRIGUEZ, NIEVES GUEVARA SOLANO,
MARCELINA DIEGO GONZALEZ, FIDEL
GALVEZ BARRERA, CANDIDO LOPEZ
VASQUEZ, FILIBERTO LOPEZ VASQUEZ,
MAYDELI GUZMAN SIERRA, MARIA
SOLEDAD MONTOYA, SAMUEL SALAZAR
AGUILAR, LEONARDO SALAZAR TOMAS,
JOSE FERNANDO ORTIZ, ISIDRO
SANCHEZ, on behalf of themselves and other
aggrieved employees,

Plaintiffs,

v.

SEVENTH TREE FARM, INC., DURANGO
HARVEST, INC., OMAR HERMOCILLO, an
individual, CINDY BALDERAS, an
individual, PATRICIA MEDINA, an
individual, REYES BALDERAS, an
individual, DUJI EXCHANGE, LLC, REITER
AFFILIATED COMPANIES, LLC,
DRISCOLL'S, INC., and DOES 3-10,
INCLUSIVE,

Defendants.

Case No.: 2023CUOE007871

**DECLARATION OF KIMBERLY
OUILLETTE IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION
FOR SETTLEMENT APPROVAL,
AWARD OF ATTORNEYS' FEES AND
COSTS, AND REIMBURSEMENT OF
SETTLEMENT ADMINISTRATION
EXPENSES**

Hearing Date: August 13, 2025
Time: 8:30 AM
Dept.: 41
Judge: Honorable Carla Ortega

Complaint Filed: April 17, 2023
FAC Filed: October 4, 2023
SAC Filed: March 19, 2024
TAC Filed: October 24, 2024

Trial Date: August 24, 2026

Case No.: 2023CUOE007871

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8 *Attorney for Plaintiffs*

9 Alexxander Campbell, SBN 307703
10 Kimberly Ouillette, SBN 326562
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12 Samuel L. Aber, SBN 355834
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22 *Attorneys for Plaintiffs*

1 I, Kimberly Ouillette, declare as follows:

2 1. I am an attorney licensed to practice in the State of California. I am the Program
3 Director and a Staff Attorney for the Wage Protection Program at Legal Aid at Work (“LAAW”).
4 Along with our co-counsel California Rural Legal Assistance, Inc. (“CRLA”), I represent
5 Plaintiffs in the above-entitled action. Except as otherwise noted, I have personal knowledge of
6 the facts set forth herein, and if called to testify thereto, could and would do so competently.

7 2. I have represented Plaintiffs in this case since its inception. I have been intimately
8 involved in all aspects of this dispute and the resulting settlement. I make this declaration in
9 support of Plaintiffs’ Motion to Approve Settlement Pursuant to the Private Attorneys General
10 Act of 2004, Award Attorneys’ Fees and Costs, and Reimburse Settlement Administration
11 Expenses.

12 **PROCEDURAL HISTORY**

13 3. Plaintiffs’ counsel began investigating this action in August of 2022. Plaintiffs’
14 counsel’s investigation into the facts and potential claims and remedies included interviewing
15 sixteen Plaintiffs and other witnesses, gathering and reviewing documentary evidence,
16 researching potential defendants, and researching state and federal laws.

17 4. On January 19, 2023, Plaintiffs provided the California Labor and Workforce
18 Development Agency (“LWDA”) with written notice of their intent to assert claims under the
19 California Private Attorneys General Act of 2004 (“PAGA”) and the basis for those claims. This
20 notice was also sent to Defendants Reiter Affiliated Companies, LLC (“RAC”); Durango Harvest,
21 Inc. (“Durango Harvest”); and Seventh Tree Farm, Inc. (“Seventh Tree Farm”).

22 5. On February 8, 2023, Plaintiffs filed an amended PAGA notice with the LWDA
23 via the online filing system and via certified mail to Defendants, adding Driscoll’s, Inc.
24 (“Driscoll’s”) to the notice.

25 6. On April 17, 2023, Plaintiffs filed their complaint in this matter, which alleged
26 that Defendants failed to pay contract wages; failed to pay minimum wages; failed to pay overtime
27 wages; failed to adequately compensate rest breaks; failed to furnish accurate wage statements;
28 failed to pay all wages owed at the end of Plaintiffs’ employment. Plaintiffs alleged that

1 Defendant Seventh Tree Farm failed to timely permit inspection of payroll and personnel records
2 as well as farm labor contractor compensation statements. Plaintiffs also allege claims under
3 PAGA on behalf of themselves and other field workers who experienced similar violations.

4 7. Through discovery, Plaintiffs discovered the existence of an additional Defendant,
5 Duji Exchange, LLC (“Duji”). On September 7, 2023, Plaintiffs submitted an amended PAGA
6 notice to include Duji Exchange, LLC.

7 8. On October 4, 2023, Plaintiffs filed a First Amended Complaint (the “FAC”),
8 which added Duji Exchange, LLC and Reiter Affiliated Companies, LLC as Defendants in the
9 case.

10 9. On March 19, 2024, after Plaintiffs had satisfied administrative exhaustion
11 requirements before the LWDA, Plaintiffs filed a Second Amended Complaint (“SAC”) which
12 added Duji as a Defendant in the PAGA cause of action.

13 10. On October 24, 2024, Plaintiffs filed a Third Amended Complaint (“TAC”) which
14 added factual allegations related to several of the Defendants.

15 11. The parties conducted extensive written discovery and took four depositions
16 during the course of the case.

17 12. The parties attended a full day mediation with Henry J. Bongiovi on July 15, 2024.
18 No settlement was reached on that day.

19 13. In December of 2024, the parties reinitiated settlement discussions with the
20 assistance of Mr. Bongiovi and ultimately reached a tentative agreement on March 7, 2025.

21 14. Following the agreement in principle, the parties negotiated the written terms of a
22 formal Settlement Agreement. The finalized and signed Settlement Agreement is attached as
23 **Exhibit 1**.

24 15. Simultaneously to the filing of this Motion, Plaintiffs’ counsel are providing the
25 Settlement Agreement and the moving and supporting papers for this motion to the LWDA
26 pursuant to California Labor Code section 2699(1)(2).
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17. I reviewed the payroll records and timecards of all aggrieved employees to determine the number of pay periods that each individual worked and which violations each individual suffered within each of those pay periods.

19. Based upon my analysis of the documentary evidence in this case, I determined that the maximum possible recovery of PAGA penalties in this case is \$1,000,600.00, which includes an assessment of multiple penalties where multiple violations occurred within a single pay period. Therefore, the PAGA penalty is approximately 6% of the PAGA exposure. This means PAGA members and the LWDA will receive a penalty within the range of penalties regularly awarded by courts.

5 Case No.: 2023CUOE007871

DECLARATION OF KIMBERLY OUILLETTE IN SUPPORT OF MOTION TO APPROVE
SETTLEMENT

1 harvest are being tracked and paid correctly. Defendants Seventh Tree Farm and Durango
2 Harvest will also provide a training to all supervisors and owners on wage and hour law and
3 compliance. Additionally, for the next two years following the effective date of this settlement,
4 Defendants Seventh Tree Farm and Durango Harvest will also distribute to each employee hired
5 by either entity, no later than the employee's first workday of each season, a copy of a one-page
6 notice in English and Spanish that explains the employee's rights to minimum wages, overtime
7 wages, piece rate wages, and meal and rest periods. The notice also provides resources to
8 employees for how to report concerns if they believe they are not being paid correctly. The value
9 of these non-monetary changes is significant; they will help deter Defendants from committing
10 future violations and ensure that future employees are informed of their rights and better able to
11 address and resolve any issues related to payment of wages immediately.

12 21. While Plaintiffs' counsel believe that the claims alleged were meritorious and
13 warranted full imposition of PAGA penalties, the risks and costs associated with continued
14 litigation were substantial. The case involved nine Defendants, many of whom denied that they
15 employed Plaintiffs and other aggrieved employees. Disputes over joint liability and client
16 employer liability of various entities would likely have involved significant additional motion
17 practice that came with some degree of risk for Plaintiffs. Additionally, Plaintiffs' ability to
18 contact PAGA Settlement Group Members to continue to gather evidence to support claims was
19 severely limited by the fact that Defendants maintained no phone contact information for these
20 workers and possessed addresses for only about half of the group of workers. The costs of
21 litigating this case through trial would be extremely high. Plaintiffs' counsel anticipated
22 defending and taking over a dozen of additional depositions, engaging in substantial motion
23 practice, and preparing for a trial that was scheduled to last 25 days. Finally, even if Plaintiffs
24 prevailed at trial, there were still substantial risks that a judge would award less than 100% of the
25 value of PAGA penalties for each violation and each pay period.

26 22. I believe this settlement is fair and reasonable in light of Plaintiffs' and aggrieved
27 employees' recovery, and the risks and costs of litigation.
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ATTORNEYS' FEES AND COSTS

23. I received my undergraduate degree from George Washington University in 2013 and my law degree from University of California, Berkeley School of Law in 2018. I was admitted to practice law in California in July 2019. From September of 2018 through September of 2019, I clerked for Judge Christina Reiss on the U.S. District Court for the District of Vermont. Since September 2019, I have been employed as an attorney at Legal Aid at Work (“LAAW”), where I have represented workers experiencing wage theft, retaliation, and other violations of their workplace rights. I am bilingual in Spanish and English.

24. Alexxander Campbell is an attorney licensed to practice law in California and one of the attorneys from LAAW representing Plaintiffs in this case. Mr. Campbell graduated from University of California, Berkeley School of Law in 2015 and was admitted to practice law in California in December 2015. From 2015 through 2018, Mr. Campbell worked as an attorney at the Homeless Action Center in Oakland, California. Since 2018, Mr. Campbell has been employed at LAAW, where he has represented countless workers who have experienced wage theft and retaliation. He is bilingual in Spanish and English.

25. George Warner is an attorney licensed to practice law in California and one of the attorneys from LAAW representing Plaintiffs in this case. Mr. Warner graduated from Stanford Law School in 2017 and was admitted to practice law in California in March 2018. Mr. Warner clerked for the Honorable Vince Chhabria on the U.S. District Court for the Northern District of California, and the Honorable Marsha Berzon on the U.S. Court of Appeals for the Ninth Circuit. Since 2019, he has served as an attorney at LAAW, where he has litigated numerous wage and hour cases.

26. Abigail Cruz is an attorney licensed to practice law in California and one of the attorneys from LAAW representing Plaintiffs in this case. Ms. Cruz graduated from UC Law San Francisco in 2023, and she has been employed at Legal Aid at Work since then. She was admitted to practice law in California in November 2023. Ms. Cruz has experience representing employees in cases involving wage theft and retaliation, with a particular focus on representing agricultural employees. Ms. Cruz is bilingual in Spanish and English.

27. The following are the current hourly rates for the above attorneys. These rates which have been adjusted downward to reflect the differences between the rates in San Francisco, where LAAW is based, and typical rates in Ventura County.

Name	Bar Admission Date	Hourly Rate
Kim Ouillette	2019	\$480
Alexxander Campbell	2015	\$600
George Warner	2018	\$520
Abigail Cruz	2023	\$350

28. LAAW as a matter of policy maintains contemporaneous records of time expended on all cases. Attorneys report time in our time management system using pre-set codes and add descriptions of work completed. I have reviewed the time records submitted in this case and they include my time as well as the time of Alexxander Campbell, George Warner, and Abigail Cruz. There was also a paralegal and another attorney who billed time on this case that have not been included in the following calculations. Attached hereto as **Exhibit 2** is a true and correct copy of an Excel spreadsheet reflecting the time spent by the four primary attorneys who worked on this case. In determining these values, I exercised billing discretion to exclude time related to internal communications and other administrative tasks.

29. The total Lodestar (reasonable rate multiple by hours worked) generated by LAAW attorneys' work on this case was \$506,044.00 based on 1,140.5 hours spent working on the case by the four primary attorneys. However, LAAW is only seeking recovery of \$31,484.24, which represents 6% of the value of the Lodestar.

30. LAAW expects to spend additional time preparing for and attending the settlement approval hearing and dealing with any issues related to settlement administration. These additional hours are not reflected above or in the lodestar calculation below.

31. The results achieved in this lawsuit demonstrate that Plaintiffs' counsel's fee is reasonable. Within approximately two years of litigation, significant economic and non-economic relief has been obtained for Plaintiffs and the 625 PAGA Settlement Group Members.

1 32. LAAW's costs in this case totaled \$30,518.41. A true and correct copy of the
2 Expense Report is attached as **Exhibit 3**. These were all necessary and reasonable expenses made
3 in order to successfully litigate this case.
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5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct. Executed on July 18, 2025, in Oakland, California.
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10 _____
11 Kimberly Ouillette
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Exhibit 1

INDIVIDUAL AND PAGA SETTLEMENT AGREEMENT AND RELEASE OF CLAIMS

Subject to court approval, Plaintiffs Carmen Mina Suarez, Cecilia Dolores Martinez, Alfonso Maldonado Santiago, Margarita Lopez Hernandez, Lorenzo Romero Rodriguez, Nieves Guevara Solano, Marcelina Diego Gonzalez, Fidel Galvez Barrera, Candido Lopez Vasquez, Filiberto Lopez Vasquez, Maydeli Guzman Sierra, Maria Soledad Montoya, Samuel Salazar Aguilar, Leonardo Salazar Tomas, Jose Fernando Ortiz, and Isidro Sanchez (together “Plaintiffs”), in their individual capacities and on behalf of the aggrieved employees and as private attorney general on behalf of the State of California, on the one hand, and Defendants Seventh Tree Farm, Inc., Durango Harvest, Inc., Omar Hermocillo, Cindy Balderas, Patricia Medina, Reyes Balderas (“Defendants”), on the other hand (collectively, the “Parties”), hereby agree to the following settlement (“Settlement,” “Settlement Agreement,” or “Agreement”) of individual claims and claims under the Private Attorneys General Act (“PAGA”)

RECITALS

WHEREAS, on January 19, 2023, counsel for Plaintiffs sent notice to the Labor and Workforce Development Agency (“LWDA”) and Reiter Affiliated Companies, LLC, Reiter Brothers, Inc., Durango Harvest, Inc., Seventh Tree Farm, Inc., Omar Hermocillo, Patricia Medina, and Cindy Balderas of their intent to pursue a representative action pursuant to PAGA, on behalf of themselves and the State of California, as well as on behalf of a group of alleged aggrieved employees based on alleged violations of California Labor Code sections 201, 202, 203, 205, 205.5, 210, 218, 226, 226.2, 226.3, 510, 558, 558.1, 1174.5, 1182.12, 1197.1, 1194, 1194.2, 1197, and 1197.1 8 Cal. Code of Regs. Section 11140 and Industrial Welfare Commission Wage Order 14 (“PAGA Notice”);

WHEREAS, on February 8, 2023, counsel for Plaintiffs sent an amended notice to the LWDA and Driscoll’s, Inc., Reiter Affiliated Companies, LLC, Reiter Brothers, Inc., Durango Harvest, Inc., Seventh Tree Farm, Inc., Omar Hermocillo, Patricia Medina, and Cindy Balderas which alleged violations of California Labor Code sections 201, 202, 203, 205, 205.5, 210, 218, 226, 226.2, 226.3, 510, 558, 558.1, 1174.5, 1197.1, 1194, 1197, and 1197.1, as well as applicable Industrial Welfare Commission Wage Orders (“Amended PAGA Notice”);

WHEREAS, on April 17, 2023, Plaintiffs filed a lawsuit entitled *Carmen Mina Suarez, et al. v. Seventh Tree Farm, Inc., et al.*, Ventura County Superior Court, Case No. 2023CUOE007871 (“PAGA Action”) against Seventh Tree Farm, Inc., Durango Harvest, Inc., Omar Hermocillo, Cindy Balderas, Patricia Medina, Reyes Balderas, and Driscoll’s, Inc.;

WHEREAS, on September 7, 2023, counsel for Plaintiffs sent a second amended notice to the LWDA and Duji Exchange, LLC, Driscoll’s, Inc., Reiter Affiliated Companies, LLC, Reiter Brothers, Inc., Durango Harvest, Inc., Seventh Tree Farm, Inc., Omar Hermocillo, Patricia Medina, Reyes Balderas, and Cindy Balderas which alleged violations of California Labor Code sections 201, 202, 203, 205, 205.5, 210, 218, 226, 226.2, 226.3, 510, 558, 558.1, 1174.5, 1197.1, 1194, 1197, and 1197.1 as well as applicable Industrial Welfare Commission Wage Orders (“Second Amended PAGA Notice”);

WHEREAS, on October 4, 2023, Plaintiffs filed a First Amended Complaint to name Duji Exchange, LLC and Reiter Affiliated Companies, LLC as additional defendants;

WHEREAS, on March 19, 2024, Plaintiffs filed a Second Amended Complaint to add a wage statement claim and to formally include Duji Exchange, LLC as a defendant on the PAGA representative claim;

WHEREAS, on October 24, 2024, Plaintiffs filed a Third Amended Complaint, which is the Operative Complaint in the PAGA Action;

WHEREAS, Defendants at all relevant times denied, and currently deny, all claims;

WHEREAS, on July 15, 2024, counsel for Plaintiffs and Defendants participated in an all-day mediation with experienced wage-and-hour mediator Henry Bongiovi, Esq.

WHEREAS, the Parties continued settlement discussions with the assistance of the mediator for months following mediation, and thereafter agreed to resolve the PAGA Action; ultimately reached the Settlement described herein, which was negotiated in light of all known facts and circumstances, including the potential defenses asserted by Defendants, the uncertainty associated with litigation, the risks of significant delay, and numerous potential appellate issues.

PERSONS COVERED BY THE SETTLEMENT

1. **Releases by Plaintiffs:** In exchange for the consideration provided herein, Plaintiffs

agree to a general release of all claims described in paragraphs 21, 22 and 23 below.

2. **Aggrieved Employees:** In addition to the settlement and general release of Plaintiffs' individual claims, this Settlement covers all non-exempt employees of Durango Harvest, Inc. and/or Seventh Tree Farm, Inc. who worked at any time during the Settlement Period ("Aggrieved Employees").

3. **Settlement Period:** The Settlement of PAGA Claims covers the period from January 19, 2022 through July 8, 2022 ("Settlement Period").

4. **Effective Date:** The "Effective Date" will be the date the Court enters a Judgment and Order approving this Settlement. At no time will Defendants have any obligation to fund the Settlement, in whole or in part, until after the occurrence of this Effective Date.

SETTLEMENT CONSIDERATION

5. **Settlement Amount:** Subject to the terms and conditions of this Agreement, Defendants will pay the gross maximum amount of Two Hundred Sixty-Five Thousand U.S. Dollars (\$265,000.00) ("Settlement Amount") to settle all claims in the Action and any other claims released pursuant to this Agreement. In no event shall Defendants be responsible for paying more than the Settlement Amount. The Settlement Amount includes Attorneys' Fees, Litigation Costs, Settlement Administrator Costs, Plaintiffs' Individual Release Payments, and payment for the "PAGA Released Claims" as defined below (including payment to the LWDA and payments to Aggrieved Employees).

6. **Plaintiffs' Individual Release Payments:** Within twenty-one (21) calendar days of receipt of the deposit of the Settlement Amount by the Settlement Administrator from Defendants, the Settlement Administrator shall pay Plaintiffs a collective total of \$121,167.39 in exchange for the releases provided in this Agreement. A chart indicating the amount to be paid to each Plaintiff is below.

Plaintiff Name	Amount
Alfonso Maldonado Santiago	\$ 4,745.17
Candido Lopez Vasquez	\$ 7,856.83
Carmen Mina Suarez	\$ 13,765.79
Cecilia Dolores Martinez	\$ 6,337.86
Fidel Galvez Barrera	\$ 8,105.45
Filiberto Lopez Vazquez	\$ 6,999.43

Isidro Sanchez Ortiz	\$ 7,781.95
Jose Fernando Ortiz	\$ 8,215.14
Leonardo Salazar Tomas	\$ 6,734.26
Lorenzo Romero Rodriguez	\$ 8,563.80
Marcelina Diego Gonzalez	\$ 7,797.03
Margarita Lopez Hernandez	\$ 8,451.40
Maria Soledad Montoya	\$ 6,906.17
Maydeli Guzman Sierra	\$ 4,736.88
Nieves Guevara Solano	\$ 6,805.05
Samuel Salazar Aguilar	\$ 7,365.18

7. **Attorneys' Fees:** In full satisfaction of all claims Plaintiffs and Aggrieved Employees may have for attorneys' fees arising out of the PAGA Action, California Rural Legal Assistance, Inc. and Legal Aid at Work ("Plaintiffs' Counsel") shall request, and be paid, the amount of \$39,750.00, which is fifteen percent (15%) of the Settlement Amount, subject to court approval. To the extent the Court approves attorneys' fees less than this amount, the difference shall be added to the PAGA Penalties Fund. Within twenty-one (21) calendar days of receipt of the deposit of the Settlement Amount by the Settlement Administrator from Defendants, the Settlement Administrator shall pay Plaintiffs' Counsel the amount described in this paragraph.

8. **Litigation Costs:** In full satisfaction of all claims Plaintiffs and Aggrieved Employees may have for litigation costs arising out of the PAGA Action, Plaintiffs' Counsel shall request and be paid from the Settlement Amount a maximum amount of \$33,046.61 in litigation costs, subject to Court approval. To the extent the Court approves litigation costs of less than \$33,046.61, the difference shall be added to the PAGA Penalties Fund. Within twenty-one (21) days of receipt of the deposit of the Settlement Amount by the Settlement Administrator from Defendants, the Settlement Administrator shall pay Plaintiffs' Counsel the amount described in this paragraph.

Settlement Administrator: Apex Class Action LLC shall be the third-party Settlement Administrator for the purposes of administering this Settlement. The Parties have jointly selected Apex Class Action LLC and verified that, as a condition of appointment, Apex Class Action LLC agrees to be bound by this Agreement and to perform, as a fiduciary, all duties specified in this Agreement in exchange for the

Parties' request to the Court for the payment of the Settlement Administration Costs. The Parties, Plaintiffs' Counsel and Defendants' Counsel, represent they have no interest or relationship, financial or otherwise, with the Settlement Administrator other than a professional relationship arising out of prior experiences administering settlements.

9. **PAGA Penalties Fund:** The Parties agree that Defendants, through the Settlement Administrator, will pay the LWDA and Aggrieved Employees in full satisfaction of all claims for PAGA civil penalties under the California Labor Code in an amount equal to the remainder of the Settlement Amount following deduction of Plaintiffs' Individual Release Payments and any court-approved attorneys' fees, litigation costs, and settlement-administration costs ("PAGA Penalties Fund"). This amount is expected to be \$63,386.00. Pursuant to PAGA, 75 percent of the PAGA Penalties Fund will be paid to the LWDA, and the remaining 25 percent will be paid to all Aggrieved Employees in proportion to the respective number of pay periods they were employed during the Settlement Period. Within twenty-one (21) days of receipt of the deposit of the Settlement Amount by the Settlement Administrator from Defendants, the Settlement Administrator shall pay the LWDA 75 percent of the PAGA Penalties Fund.

10. **Employer Identification Number:** The Settlement Administrator shall have and use its own Employer Identification Number for purposes of calculating payroll-tax withholdings and providing reports to state and federal tax authorities.

11. **Qualified Settlement Fund:** The Settlement Administrator shall establish a settlement fund that meets the requirements of a qualified settlement fund ("QSF") under U.S. Treasury Regulation section 468B-1.

12. **Settlement Administration Costs:** Settlement Administration Costs will be paid to the Settlement Administrator for administering this Settlement, including, but not limited to, printing, distributing, and tracking documents for this Settlement, calculating estimated amounts per aggrieved employee, tax reporting, distributing the PAGA Penalties Fund and Plaintiffs' Individual Release Payments, providing necessary reports and declarations, and other duties and responsibilities as requested by the Parties. The Settlement Administration Costs will be paid from the Settlement Amount, including,

if necessary, any such costs in excess of the amount represented by the Settlement Administrator as being the maximum necessary to administer the Settlement, which the Settlement Administrator has agreed will be no greater than \$7,650.00. Within twenty-one (21) days of receipt of the deposit of the Settlement Amount by the Settlement Administrator from Defendants, the Settlement Administrator shall pay itself the amount described in this paragraph. To the extent the Court approves settlement-administration costs of less than the amount requested by the Parties, the difference shall be added to the PAGA Penalties Fund.

13. Court Approval of the Settlement and Distribution of the Settlement Payments:

This Agreement is contingent on the Court's approval of the settlement of the PAGA Action. Within thirty (30) days of the Parties executing this Settlement Agreement, Plaintiffs will file a stipulation or motion requesting the Court issue an order approving and incorporating by reference the terms and conditions of the Settlement Agreement and entering judgment. Plaintiffs and Defendants will jointly prepare the proposed Approval Judgment and Order to be entered by the Court to enforce this Agreement. The proposed Approval Judgment and Order will be submitted concurrently with the documents asking the Court to approve the settlement. Plaintiffs shall promptly submit a copy of this Settlement Agreement to the LWDA at the same time the stipulation or motion for settlement approval is filed with the Court. If the Court does not approve this Settlement or conditions Court approval on any material change to this Agreement, counsel for Plaintiffs and counsel for Defendants will expeditiously work together on behalf of the Parties by meeting in person or by telephone, and in good faith, to modify the Agreement and otherwise satisfy the Court's concerns.

14. Funding of the Settlement: Within thirty (30) calendar days after the court's entry of the approval order and judgment, Defendants will pay the Settlement Amount to the Settlement Administrator.

15. Settlement Payments to the Aggrieved Employees: No later than thirty (30) calendar days after the Effective Date, the Parties shall provide the Settlement Administrator with a list of all Aggrieved Employees ("Aggrieved Employees List"). The Aggrieved Employees List shall state the first name and last name for each Aggrieved Employee; the last known mailing address for each Aggrieved

Employee, if any; each Aggrieved Employee's social security number, if known; and the number of payroll periods during the Settlement Period during which each Aggrieved Employee was employed. Promptly upon receipt of the Aggrieved Employees List, the Settlement Administrator shall obtain updated forwarding addresses from the U.S. Postal Service through a National Change of Address search and perform subsequent computer searches to confirm the most recent address available and any other reasonable investigation efforts to locate current addresses for Class Members.

16. **PAGA Payment:** No later than twenty-one (21) calendar days after receipt of the Settlement Amount from Defendants, the Settlement Administrator will issue the Aggrieved Employees checks that total 25 percent of the PAGA Penalties Fund (the "PAGA Payments"), along with an explanatory letter in the form attached hereto as **Exhibit A**. The Settlement Administrator will calculate the amounts paid to each Aggrieved Employee using the following methodology: 25% of the PAGA Penalties Fund divided by the total number of payroll periods that all Aggrieved Employees were employed during the Settlement Period, and multiplied by the individual Aggrieved Employee's payroll periods employed during the Settlement Period.

17. Each check for the PAGA Payments will remain negotiable for one-hundred twenty (120) calendar days. Any checks returned as non-deliverable on or before the check-cashing deadline will be sent promptly via regular first-class U.S. Mail to the forwarding address affixed thereto. If no forwarding address is provided, the Settlement Administrator will promptly attempt to determine the correct address using a skip-trace or another search using the name, address, or social security number of the Aggrieved Employee involved. If the Settlement Administrator cannot identify any reliable mailing address for an Aggrieved Employee, no payment will be issued to that Aggrieved Employee.

18. In the event that an Aggrieved Employee's payment is undeliverable, uncashed, or otherwise not distributed, the terms of the final judgment, as well as the Release of Claims set forth in this Agreement, will nevertheless be binding upon that Aggrieved Employee and the State of California with respect to that Aggrieved Employee.

19. **Cy Pres Beneficiary:** Any funds remaining in the PAGA Penalties Fund one-hundred twenty (120) calendar days after the PAGA Payments will be paid to Community Action of Ventura

County, 621 Richmond Ave. Oxnard, CA 93030, as a cy pres beneficiary. If the Court disapproves of this beneficiary, the Court may appoint another cy pres beneficiary to receive these remaining funds.

20. **Reporting of Payments:** All payments made to Aggrieved Employees shall, if required by applicable state and/or federal law, be reported on a federal form 1099 that shall be provided to the individual Aggrieved Employees. Aggrieved Employees are responsible for correctly characterizing this compensation for tax purposes and paying any taxes owing on said amounts.

21. **Releases of Claims for Aggrieved Employees and the State of California:** Upon issuance of the Court's approval order and judgment, and effective on the date when Defendants fully fund the Settlement Amount, Plaintiffs, all Aggrieved Employees, and the State of California shall fully release and forever discharge any and all claims against the Released Parties arising during the Settlement Period for civil penalties under PAGA that were alleged or could have been alleged in the PAGA Action ("Released Claims"). The Released Claims include but are not limited to claims for PAGA penalties for alleged violations of California Labor Code sections 201, 202, 203, 205, 205.5, 210, 215, 218, 226, 226.2, 226.3, 510, 558, 558.1, 1174.5, 1182.12, 1197.1, 1194, 1194.2, 1197, 1197.1, 1198, 1198.5, and 1695 as well as all applicable Industrial Welfare Commission Wage Orders (as codified in the California Code of Regulations), and claims for attorneys' fees, costs, or interest resulting therefrom. "Released Parties" shall mean Defendants and Driscoll's, Inc., Duji Exchange, LLC, and Reiter Affiliated Companies, LLC and each of their respective past and present related entities, parents, subsidiaries, predecessors, successors, assigns, owners, officers, directors, employees, agents, trustees, affiliated entities, attorneys or legal representatives, insurers, fiduciaries, beneficiaries, and partners in relation to the Released Claims. Upon issuance of the Court's Approval Judgment and Order, Plaintiffs, all Aggrieved Employees, and the State of California will be forever barred from pursuing against Defendants and the Released Parties any and all claims for PAGA civil penalties under the Labor Code, the Industrial Welfare Commission's wage orders, and/or other provisions of law that were alleged or that could have been alleged in the PAGA Action with respect to the Aggrieved Employees.

22. **Releases of Claims for Plaintiffs:** Upon issuance of the Court's approval order and judgment, and effective on the date when Defendants fully fund the Settlement Amount, each of Plaintiffs

and each of their respective spouses, representatives, agents, attorneys, heirs, administrators, successors, and assigns generally and fully release and forever discharge Defendants and the Released Parties from all claims, complaints, costs, damages, demands, expenses, and liabilities of any nature and under any legal theory of liability whatsoever, arising from or relating to any transaction or occurrence, including, but not limited to all claims that were, or reasonably could have been, alleged, based on the facts contained, in the Operative Complaint and all PAGA claims that were, or reasonably could have been, alleged based on facts contained in the Operative Complaint or Plaintiffs' PAGA Notices (collectively "Plaintiffs' Released Claims"). Plaintiffs' Released Claims do not extend to any claims or actions to enforce this Agreement, or to any claims for vested benefits, unemployment benefits, disability benefits, social security benefits, workers' compensation benefits that arose at any time, or based on occurrences outside the Class Period. Plaintiffs acknowledge that Plaintiffs may discover facts or law different from, or in addition to, the facts or law that Plaintiffs now know or believe to be true but agree, nonetheless, that Plaintiffs' Released Claims shall be and remain effective in all respects, notwithstanding such different or additional facts or Plaintiffs' discovery of them.

23. **Plaintiffs' Waiver of Rights Under California Civil Code Section 1542:** Included in Plaintiffs' Released Claims, Plaintiffs expressly waive and relinquish the provisions, rights, and benefits, if any, of section 1542 of the California Civil Code, which reads: "A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY."

24. **No Credit Toward Benefit Plans:** Payments to Aggrieved Employees as referenced herein will not be utilized to calculate any additional benefits under any benefit plans to which any Aggrieved Employee may be eligible, including, but not limited to, profit-sharing plans, bonus plans, 401(k) plans, vacation plans, sick-leave plans, PTO plans, and any other benefit plan. Rather, it is the Parties' intention that this Settlement Agreement will not affect any rights, contributions, or amounts to which any Aggrieved Employee may be entitled under any benefit plans.

25. **Tax Liability:** Defendants, Defendants' Counsel and Plaintiffs' Counsel make no representations as to the tax treatment or legal effect of the payments called for hereunder, and the Aggrieved Employees shall not rely on any statement or representation by Defendants or Plaintiffs' Counsel in this regard. The Aggrieved Employees shall be solely responsible for the payment of their portion of any taxes and penalties assessed on the payments described herein. All parties are aware that certain State and Federal income tax consequences may be incurred as a result of the consummation of this agreement. All parties are independently relying on their own legal counsel and accountants in connection with such consequences. No party will look to any other party for reimbursement or indemnification of any such taxes. Each party is responsible for their own tax consequences resulting from this Agreement.

26. **Affirmative Relief as to Seventh Tree Farm, Inc. and Durango Harvest, Inc.:** Seventh Tree Farm, Inc. and Durango Harvest, Inc. agree to the following terms concerning affirmative relief:

- A. Compliance with California Wage and Hour Laws: As required or may be required by California law, Seventh Tree Farm, Inc. and Durango Harvest, Inc. will adhere to California Labor Code requirements, including but not limited to compliance with payment of piece rates as contracted with employees, payment of required minimum wages, overtime, rest and recovery periods, and recordkeeping. Seventh Tree Farm, Inc. and Durango Harvest, Inc. agree to provide a list of boxes harvested per worker, or per crew only if a crew-based piece rate is used, to all employees being compensated on a piece rate basis within one business day of when the work is completed.
- B. Training: Seventh Tree Farm, Inc. and Durango Harvest, Inc. will provide training to all supervisors, including to individuals Omar Hermocillo, Cindy Balderas, Patricia Medina, and Reyes Balderas regarding wage and hour law and compliance, including but not limited to coverage of the following topics: overtime premiums, piece rate wage requirements, and the information to be included on paystubs. The training shall be conducted within 180 days of the Effective Date. No later than 30 days after the training has been completed, Seventh Tree

Farm, Inc. and Durango Harvest, Inc. shall email Plaintiffs' counsel at kouillette@legalaidthatwork.org to confirm the date on which the training was completed; confirm that Omar Hermocillo, Cindy Balderas, Patricia Medina, and Reyes Balderas attended the training; and state the total number of individuals who attended the training.

27. **Postings and Notices:** For two years following the execution of this Settlement Agreement, Seventh Tree Farm, Inc. and Durango Harvest, Inc. will distribute to each worker, no later than the worker's first workday of each season, a copy of the "IMPORTANT NOTICE TO EMPLOYEES" attached as **Exhibit B** in English and Spanish as may be modified from time to time to comply with California law. All workers will be permitted to keep a copy of the notice attached as Exhibit B in Spanish and shall not be required to return their copy to Seventh Tree Farm, Inc. and Durango Harvest, Inc.

28. **No Prior Assignments:** The Parties and their counsel represent, covenant, and warrant that they have not directly or indirectly assigned, transferred, encumbered, or purported to assign, transfer, or encumber to any person or entity any portion of any liability, claim, demand, action, cause of action, or right herein released and discharged.

29. **Nullification of Settlement Agreement:** In the event that (i) the Court does not approve the Settlement as provided herein or (ii) the Settlement does not become final for any other reason, then this Settlement Agreement, and any documents generated to bring it into effect, will be null and void, and the Parties will be returned to their original respective positions before the Settlement was executed.

30. **Continued Jurisdiction:** After entry of the Court's Approval Judgment and Order, the Court will have continuing jurisdiction solely for purposes of addressing (i) the interpretation and enforcement of the terms of the Settlement, (ii) settlement-administration matters, and (iii) such post-approval matters as may be appropriate under court rules or as set forth in this Settlement.

31. **Preclusive Effect of Settlement Agreement and Approval:** The terms of this Agreement, the approval order, and the judgment are binding on Plaintiffs, the State of California, and all Aggrieved Employees, as well as their respective heirs, executors and administrators, successors and assigns, and any other persons or entities acting on their behalf, and those terms shall have res judicata,

collateral-estoppel, and other preclusive effect in all pending and future claims, lawsuits, or other proceedings maintained by or on behalf of any such persons, to the extent those claims, lawsuits, or other proceedings constitute Released Claims as set forth in the Agreement. Notwithstanding any other provision in this Agreement, this Agreement, the approval order, and the judgment in the PAGA Action may be filed in any action against or by Defendants or the Released Parties to support a defense of res judicata, collateral estoppel, release, waiver, good-faith settlement, judgment bar or reduction, full faith and credit, or any other theory of claim preclusion, issue preclusion, or similar defense or counterclaim.

32. **Entire Agreement:** This Settlement Agreement constitutes the entirety of the Parties' settlement terms with regard to the settlement of the PAGA Action. No other prior or contemporaneous written or oral agreements may be deemed binding on the Parties.

33. **Amendment or Modification:** This Settlement Agreement may be amended or modified only by a written instrument, signed by either the Parties or their respective successors in interest.

34. **Authorization to Enter into the Settlement Agreement:** The Parties warrant and represent they expressly authorized their legal counsel to negotiate this Settlement Agreement. The Parties will direct their respective counsel to take all appropriate action required or permitted to be taken by such Parties pursuant to this Settlement Agreement to effectuate its terms and to execute any other documents required to effectuate the terms of this Settlement Agreement. The Parties through their counsel will cooperate with each other and use their best efforts to affect the implementation of the Settlement. If the Parties are unable to reach agreement on the form or content of any document needed to implement the Settlement, or on any supplemental provisions that may become necessary to effectuate the terms of this Settlement, the Parties may seek the assistance of the mediator or the Court to resolve such disagreement.

35. **Binding on Successors and Assigns:** This Settlement Agreement will be binding upon, and inure to the benefit of, the respective successors or assigns of the Parties hereto, as previously defined.

36. **California Law Governs:** All terms of this Settlement Agreement and any Exhibits hereto will be governed by, and interpreted according to, the laws of the State of California.

37. **Execution and Counterparts:** This Settlement Agreement may be executed in one or more counterparts. All executed counterparts and each of them, including facsimile and scanned copies of the signature page, will be deemed to be one and the same instrument. To facilitate execution and delivery of this Settlement Agreement, the parties may execute and exchange by facsimile or electronic image (*i.e.*, as a “.pdf” file) counterparts of the signature pages and/or sign by electronic means (*i.e.*, with DocuSign).

38. **Acknowledgement that the Settlement Is Fair and Reasonable:** The Parties believe that this Settlement Agreement is a fair, adequate, and reasonable settlement of the PAGA Action and that they have arrived at this Settlement after arm’s length negotiations. The Parties further acknowledge that they are represented by competent counsel and that they have had an opportunity to consult with their counsel regarding the fairness and reasonableness of this Settlement.

39. **Invalidity of Any Provision:** Before declaring any provision of this Settlement Agreement invalid, the Court will first attempt to construe the provision as valid to the fullest extent possible consistent with applicable precedents, so as to define all provisions of this Settlement Agreement valid and enforceable. Any provisions deemed invalid shall be severable from the rest of the Settlement Agreement.

40. **Captions:** The captions and paragraph numbers in this Settlement Agreement are inserted for the reader’s convenience, and they in no way define, limit, construe, or describe the scope or intent of the provisions of this Settlement Agreement.

41. **Waiver:** No waiver of any condition or covenant contained in this Settlement Agreement, and no failure to exercise any right or remedy by any of the Parties hereto, will be considered to imply or constitute a further waiver by such Party of the same or any other condition, covenant, right, or remedy.

42. **Enforcement Action:** In the event that one or more of the Parties institutes any legal action or other proceeding against any other Party or Parties to enforce the provisions of this Settlement, the successful Party or Parties will be entitled to recover from the unsuccessful Party or Parties reasonable

attorneys' fees and costs, including expert-witness fees incurred in connection with any such enforcement actions.

43. **Third Party Beneficiaries:** The Parties agree that each of the Released Parties who are not parties to this Agreement, including but not limited to, Driscoll's, Inc., Duji Exchange, LLC, and Reiter Affiliated Companies, LLC, shall be third-party beneficiaries of this Agreement and shall be entitled to enforce the terms and conditions of this Agreement as applicable, including but not limited to, paragraphs 21, 22, and 23 in the same manner and to the same extent as if such Released Parties were signatories to this Agreement.

44. **Mutual Preparation:** The Parties have had a full opportunity to negotiate the terms and conditions of this Settlement Agreement. Accordingly, this Settlement Agreement will not be construed more strictly against one Party than another merely by virtue of the fact that it may have been prepared by counsel for one of the Parties, it being recognized that, because of the arm's length negotiations between the Parties, all Parties have contributed to the preparation of this Settlement Agreement.

45. **Representation by Counsel:** The Parties acknowledge that they have been represented by counsel throughout all negotiations that preceded the execution of this Settlement Agreement, and that this Settlement Agreement has been reviewed in full and executed with the consent and advice of said counsel.

46. **Attorneys' Fees and Costs:** Except as expressly provided herein, Defendants and Plaintiffs shall each bear their own attorneys' fees and costs.

47. **Cooperation and Execution of Necessary Documents:** All Parties will cooperate in good faith and execute all documents to the extent reasonably necessary to effectuate the terms of this Settlement Agreement.

48. **Binding Agreement:** The Parties warrant that they understand and have full authority to enter into this Settlement, and that they intend this Settlement Agreement to be fully enforceable and binding on all Parties. The Parties agree that this Agreement will be admissible and subject to disclosure in any proceeding to enforce its terms, notwithstanding any mediation-confidentiality provisions that otherwise might apply under federal or state law.

49. **Press.** Plaintiffs' Counsel shall not issue any press release or hold a press conference related to this Settlement.

50. **No Admission of Liability:** The Parties expressly recognize that the making of this Agreement does not in any way constitute an admission or concession of wrongdoing on the part of Defendants or the Released Parties. Nothing in this Settlement, nor any action taken in implementation thereof, nor any statements, discussions, or communications, nor any materials prepared, exchanged, issued, or used during the course of the PAGA Action is intended by the Parties to constitute, be introduced, be used, or be admissible in any way in any other judicial, arbitral, administrative, investigative, or other forum or proceeding as evidence of any violation of any federal, state, or local law, statute, ordinance, regulation, rule, executive order, or any obligation or duty at law or in equity. This Agreement may be used in any proceeding in any court that has as its purpose the interpretation, implementation, or enforcement of the Settlement or any orders or judgments entered into in connection therewith.

[Signatures to Follow]

DATED: _____ By: _____
Plaintiff Samuel Salazar Aguilar

DATED: 06-30-2025 By: Carmen Mina Suarez
Plaintiff Carmen Mina Suarez

DATED: _____ By: _____
Plaintiff Cecilia Dolores Martinez

DATED: _____ By: _____
Plaintiff Alfonso Maldonado Santiago

DATED: _____ By: _____
Plaintiff Margarita Lopez Hernandez

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[Signatures to Follow]

DATED: By: _____
Plaintiff Samuel Salazar Aguilar

DATED: By: _____
Plaintiff Carmen Mina Suarez

DATED: 07/10/2025 By:  _____
Plaintiff Cecilia Dolores Martinez

DATED: By: _____
Plaintiff Alfonso Maldonado Santiago

DATED: By: _____
Plaintiff Margarita Lopez Hernandez

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[Signatures to Follow]

DATED:

By: _____
Plaintiff Samuel Salazar Aguilar

DATED:

By: _____
Plaintiff Carmen Mina Suarez

DATED:

By: _____
Plaintiff Cecilia Dolores Martinez

DATED: 07/10/2025

By:  _____
Plaintiff Alfonso Maldonado Santiago

DATED:

By: _____
Plaintiff Margarita Lopez Hernandez

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[Signatures to Follow]

DATED: By: _____
Plaintiff Samuel Salazar Aguilar

DATED: By: _____
Plaintiff Carmen Mina Suarez

DATED: By: _____
Plaintiff Cecilia Dolores Martinez

DATED: By: _____
Plaintiff Alfonso Maldonado Santiago

DATED: By: Margarita López
Plaintiff Margarita Lopez Hernandez

DATED: 06/30/2025

By: LORENZO ROMERO
Plaintiff Lorenzo Romero Rodriguez

DATED:

By: _____
Plaintiff Nieves Guevara Solano

DATED:

By: _____
Plaintiff Marcelina Diego Gonzalez

DATED:

By: _____
Plaintiff Fidel Galvez Barrera

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By: _____
Plaintiff Candido Lopez Vasquez

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By: _____
Plaintiff Filiberto Lopez Vasquez

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By: _____
Plaintiff Maydeli Guzman Sierra

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By: _____
Plaintiff Maria Soledad Montoya

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By: _____
Plaintiff Leonardo Salazar Tomas

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By: _____
Plaintiff Jose Fernando Ortiz

DATED:

By: _____
Plaintiff Isidro Sanchez

DATED:

By: _____
Plaintiff Lorenzo Romero Rodriguez

DATED: 6/30/2025

By: Nieves Guevara Solano
Plaintiff Nieves Guevara Solano

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By: _____
Plaintiff Marcelina Diego Gonzalez

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By: _____
Plaintiff Fidel Galvez Barrera

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By: _____
Plaintiff Candido Lopez Vasquez

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Plaintiff Lorenzo Romero Rodriguez

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Plaintiff Nieves Guevara Solano

DATED: 07/02/2025

By:  _____
Plaintiff Marcelina Diego Gonzalez

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Plaintiff Fidel Galvez Barrera

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Plaintiff Candido Lopez Vasquez

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DATED: 07/02/2025

By:  _____
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By: _____
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DATED: By: _____
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DATED: By: _____
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DATED: By: _____
Plaintiff Marcelina Diego Gonzalez

DATED: By: _____
Plaintiff Fidel Galvez Barrera

DATED: 07/02/2025 By: Candido Lopez Vasquez
Plaintiff Candido Lopez Vasquez

DATED: By: _____
Plaintiff Filiberto Lopez Vasquez

DATED: By: _____
Plaintiff Maydeli Guzman Sierra

DATED: By: _____
Plaintiff Maria Soledad Montoya

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By: _____
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By: _____
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By: _____
Plaintiff Fidel Galvez Barrera

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By: _____
Plaintiff Candido Lopez Vasquez

DATED: 07/02/2025

By:  _____
Plaintiff Filiberto Lopez Vasquez

DATED:

By: _____
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By: _____
Plaintiff Maria Soledad Montoya

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By: _____
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By: _____
Plaintiff Jose Fernando Ortiz

DATED:

By: _____
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By: _____
Plaintiff Lorenzo Romero Rodriguez

DATED:

By: _____
Plaintiff Nieves Guevara Solano

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By: _____
Plaintiff Marcelina Diego Gonzalez

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By: _____
Plaintiff Fidel Galvez Barrera

DATED:

By: _____
Plaintiff Candido Lopez Vasquez

DATED:

By: _____
Plaintiff Filiberto Lopez Vasquez

DATED: 07/01/2025

By: Maydeli Guzman S.
Plaintiff Maydeli Guzman Sierra

DATED:

By: _____
Plaintiff Maria Soledad Montoya

DATED:

By: _____
Plaintiff Leonardo Salazar Tomas

DATED:

By: _____
Plaintiff Jose Fernando Ortiz

DATED:

By: _____
Plaintiff Isidro Sanchez

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By: _____
Plaintiff Lorenzo Romero Rodriguez

DATED:

By: _____
Plaintiff Nieves Guevara Solano

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By: _____
Plaintiff Marcelina Diego Gonzalez

DATED:

By: _____
Plaintiff Fidel Galvez Barrera

DATED:

By: _____
Plaintiff Candido Lopez Vasquez

DATED:

By: _____
Plaintiff Filiberto Lopez Vasquez

DATED:

By: _____
Plaintiff Maydeli Guzman Sierra

DATED: 06-30-25

By: Maria Soledad Montoya Ventura
Plaintiff Maria Soledad Montoya

DATED:

By: _____
Plaintiff Leonardo Salazar Tomas

DATED:

By: _____
Plaintiff Jose Fernando Ortiz

DATED:

By: _____
Plaintiff Isidro Sanchez

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[Signatures to Follow]

DATED: 06/30/25

By: Samuel Salazar
Plaintiff Samuel Salazar Aguilar

DATED:

By: _____
Plaintiff Carmen Mina Suarez

DATED:

By: _____
Plaintiff Cecilia Dolores Martinez

DATED:

By: _____
Plaintiff Alfonso Maldonado Santiago

DATED:

By: _____
Plaintiff Margarita Lopez Hernandez

DATED:

By: _____
Plaintiff Lorenzo Romero Rodriguez

DATED:

By: _____
Plaintiff Nieves Guevara Solano

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By: _____
Plaintiff Marcelina Diego Gonzalez

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By: _____
Plaintiff Fidel Galvez Barrera

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By: _____
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DATED:

By: _____
Plaintiff Filiberto Lopez Vasquez

DATED:

By: _____
Plaintiff Maydeli Guzman Sierra

DATED:

By: _____
Plaintiff Maria Soledad Montoya

DATED: 06/30/25

By: August 06/30/25
Plaintiff Leonardo Salazar Tomas

DATED:

By: _____
Plaintiff Jose Fernando Ortiz

DATED:

By: _____
Plaintiff Isidro Sanchez

DATED:

By: _____
Plaintiff Lorenzo Romero Rodriguez

DATED:

By: _____
Plaintiff Nieves Guevara Solano

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By: _____
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By: _____
Plaintiff Fidel Galvez Barrera

DATED:

By: _____
Plaintiff Candido Lopez Vasquez

DATED:

By: _____
Plaintiff Filiberto Lopez Vasquez

DATED:

By: _____
Plaintiff Maydeli Guzman Sierra

DATED:

By: _____
Plaintiff Maria Soledad Montoya

DATED:

By: _____
Plaintiff Leonardo Salazar Tomas

DATED: 7-8-2025

By:  _____
Plaintiff Jose Fernando Ortiz

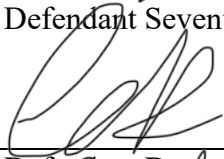
DATED: 7-8-2025

By:  _____
Plaintiff Isidro Sanchez

DATED: July 18, 2025

By: 
Defendant Seventh Tree Farm, Inc.

DATED: July 18, 2025

By: 
Defendant Durango Harvest, Inc.

DATED: July 18, 2025

By: 
Defendant Omar Hermocillo

DATED: July 18, 2025

By: 
Defendant Cindy Balderas

DATED: July 18, 2025

By: 
Defendant Patricia Medina

DATED: July 18, 2025

By: 
Defendant Reyes Balderas

APPROVED AS TO FORM AND CONTENT:

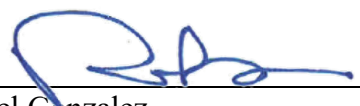
DATED: July 18, 2025

By: 
Kimberly Ouillette
Alexxander Campbell
George A. Warner
LEGAL AID AT WORK

Angelica Preciado
Anali Cortez-Bulosan
CALIFORNIA RURAL LEGAL
ASSISTANCE, INC.
Attorneys for Plaintiffs

DATED: July 18, 2025

By:



Rafael Gonzalez
MULLEN & HENZELL LLP
Attorneys for Defendants
SEVENTH TREE FARM, INC.,
DURANGO HARVEST, INC., OMAR
HERMOCILLO, CINDY
BALDERAS, PATRICIA MEDINA,
and REYES BALDERAS

EXHIBIT A

<<DATE>>

(TO BE TRANSLATED INTO SPANISH BY THE ADMINISTRATOR)

<<FIRST NAME>> <<LAST NAME>>

<<ADDRESS>>

**Re: Payment from *Carmen Mina Suarez, et al. v. Seventh Tree Farm, Inc., et al.*
Ventura County Superior Court, Case No. 2023CUOE007871**

Dear <<FIRST NAME>> <<LAST NAME>>:

Enclosed, please find a check made payable to you. This is your payment from the settlement of the lawsuit titled *Carmen Mina Suarez, et al. v. Seventh Tree Farm, Inc., et al.*, Ventura County Superior Court, Case No. 2023CUOE007871 (“PAGA Action”).

The PAGA Action was filed against Seventh Tree Farm, Inc., Durango Harvest, Inc., Omar Hermocillo, Cindy Balderas, Patricia Medina, Reyes Balderas, Duji Exchange, LLC, Reiter Affiliated Companies, LLC, and Driscoll’s, Inc. (“Defendants”) under the California Labor Code Private Attorneys General Act of 2004, California Labor Code section 2698 *et seq.* (“PAGA”). The PAGA Action was brought by former employees on behalf of the State of California and other alleged aggrieved employees. You have been identified as one of the employees on whose behalf the PAGA Action was brought.

Plaintiffs in the PAGA Action claim Defendants owe civil penalties under PAGA for alleged violations of the California Labor Code. Defendants dispute all of the allegations in the PAGA Action and deny they engaged in any of the alleged misconduct. In agreeing to enter into this Settlement, Defendants do not admit they are liable in any way for any violations of the California Labor Code, or for any penalties, and have denied and disputed all of the contentions in the PAGA Action.

The Court has not decided the merits of the claims or defenses, but it has approved the settlement of the representative PAGA claims the Parties reached. This Settlement covers all non-exempt employees of Durango Harvest, Inc. and/or Seventh Tree Farm, Inc. who worked at any time from January 19, 2022 through July 8, 2022 (“Aggrieved Employees”). A portion of the civil-penalty settlement amount goes to the State of California’s Labor and Workforce Development Agency (“LWDA”). Another portion of the civil-penalty settlement amount goes to the Aggrieved Employees.

Pursuant to the Settlement, enclosed is a check for your share of the settlement. This check will remain valid for 120 calendar days from the date of issuance. Please note that no deductions or withholdings have been made from your settlement payment, and that you are responsible for any tax consequences arising from your receipt of the same (for which an IRS Form 1099 may be issued). If you do not cash your check within 120 calendar days of issuance, the check will be cancelled. Any funds that remain undeposited will be provided to Community Action Ventura County.

If you are employed by any of the Defendants, or seek employment by any of the Defendants, your decision to cash the check will not affect your employment in any way.

While you were not a party to the PAGA Action, you and the State of California are bound by the judgment that has been approved by the Court, including the release contained in the Settlement. The release includes all claims for civil penalties under PAGA that were alleged or could have been alleged in the PAGA Action or in the PAGA Notices submitted to the LWDA in connection with the PAGA Action, including any such claims for attorneys' fees, costs, or interest, for the time period covering January 19, 2022 through July 8, 2022.

If you have further questions about this settlement, please contact the third-party settlement administrator at: [Administrator contact information].

EXHIBIT B

IMPORTANT NOTICE TO EMPLOYEES

Minimum and Overtime Wages

Durango Harvest, Inc. and Seventh Tree Farm, Inc. (together, the “Company”) comply with all applicable laws pertaining to the payment of minimum and overtime wages to employees. See the Company’s policies and the California Minimum Wage Official Notice and IWC Wage Order posted at the worksite.

Piece Rate

Piece-rate employees will have their pieces tracked by the Company’s timekeeping/payroll systems and will be separately paid for their non-productive time. Non-productive time will be paid separately from piece-rate and rest/recovery breaks and will be paid at the rate required by applicable law. Piece-rate compensation will be recorded on employee wage statements. The Company will provide a report of piece rates attributable to each employee. If you believe that your non-productive time is not being properly captured by the system you **must report your concerns to your supervisor**.

Off-the-Clock Work

Employees are required to record all of their work time on their timesheets or using the electronic timekeeping system. Employees are specifically prohibited from performing any work for the Company “off the clock.” No one has the authority to require, allow or ask, directly or indirectly, any employee to perform any work “off the clock.” Employees should refuse all requests by their supervisors to work “off the clock” and report the request to a manager.

Rest and Meal Periods

The Company provides all employees with rest and meal periods in accordance with all applicable local, state, and federal laws. During meal and rest periods, employees are entirely free from performing any labor, work, or other employment-related duties. Please see Company policy for full details regarding meal and rest periods.

Reporting

If an employee believes he or she has not been paid all compensation or provided all meal and rest periods owed as stated in this notice and/or provided by applicable wage and hour laws, the employee should immediately report his or her concern to Omar Hermocillo, in person or by phone call to (805) 462-7167. If the issue is not resolved within a reasonable amount of time, the employee should contact the nearest Labor Commissioner’s office at (805) 568-1222 or the Ventura County Farmworker Resource Program at 805-385-1899 or HSA-AGRFP@ventura.org.

Retaliation

The Company strictly prohibits all forms of retaliation toward employees, including but not limited to retaliation for reporting violations of an employee’s rights under the Labor Code and applicable IWC Wage Orders or for otherwise engaging in protected activity. If an employee believes he or she has been retaliated against, the employee should report his or her concerns to Omar Hermocillo or to the Ventura County Farmworker Resource Program at 805-385-1899 or HSA-AGRFP@ventura.org.

Name of Employee: _____

Signature: _____

Date: _____

Exhibit 2

Legal Case	User ↑	Hours: Time	Hours (Calculated)	Notes	Date
	Abigail Cruz	Time-340271		1 Draft set two request for production to Seventh Tree Farms and Durango.	8/25/2023
		Time-340406	0.3	Review and analyze first amended complaint draft for plaintiffs.	8/28/2023
		Time-340445	0.3	Draft request for production set two for Seventh Tree Farms and Durango (defendants).	8/29/2023
		Time-340497	0.1	Review and analyze elements for alter ego doctrine re Durango and Seventh Tree Farms (defendants).	8/30/2023
		Time-340499	0.2	Draft request for productions for Seventh Tree re relationship with Duji and Reiter Affiliated Companies.	8/30/2023
		Time-340540	0.9	Revise request for productions set two for Seventh Tree Farms re Duji and Reiter Affiliated Companies.	8/31/2023
		Time-340620	0.8	Review Driscoll's (defendant's) production	9/1/2023
		Time-340621	1.2	Review Driscoll's production of documents	9/1/2023
		Time-340683	3.6	Draft motion to compel Defendant Durango Harvest, Inc., O. Hermocillo, C. Balderas, P. Medina and R. Balderas re Request for Production Set	9/6/2023
		Time-340657	0.8	Review and analyze Driscoll's production of documents	9/7/2023
		Time-340684	2.3	Draft motion to compel re interrogatories for Defendants Durango Harvest, Inc., O. Hermocillo, C. Balderas, P. Medina, and R. Balderas.	9/7/2023
		Time-340859	1.1	Draft motion to compel general interrogatories and sanctions	9/8/2023
		Time-340860	1.7	Draft motion to compel re requests for production and sanctions	9/8/2023
		Time-340861	0.4	Research general interrogatories and sanctions for non-responses	9/8/2023
		Time-341040	1.1	Draft declaration for motion to compel requests for production re Durango Harvest, Inc. and Individual Defendants.	9/11/2023
		Time-341041	0.5	Draft and edit requests for production set two re Seventh Tree Farm.	9/11/2023
		Time-341042	2.2	Draft and review motion to compel requests for production re Durango Harvest, Inc. and Individual Defendants.	9/11/2023
		Time-341043	0.4	Draft and edit requests for production set two re Durango Harvest, Inc.	9/11/2023
		Time-341044	0.2	Draft motion to compel special interrogatories re Durango Harvest and Individual Defendants.	9/11/2023
		Time-341036	1	Draft motion to compel form interrogatories - general re Durango Harvest, Inc. and Individual Defendants.	9/12/2023
		Time-341037	0.7	Draft motion to compel special interrogatories re Durango Harvest, Inc. and Individual Defendants.	9/12/2023
		Time-341038	0.6	Draft motion to compel requests for production re Durango Harvest, Inc. and Individual Defendants.	9/12/2023
		Time-341031	0.9	Draft motion to compel special interrogatories re Durango Harvest, Inc. and Individual Defendants.	9/13/2023
		Time-341030	2.4	Prepare and review exhibits for motions to compel re Durango Harvest, Inc. and Individual Defendants.	9/13/2023
		Time-341035	1.3	Draft motion to compel request for admissions re Durango Harvest, Inc. and Individual Defendants.	9/14/2023
		Time-341033	0.2	Prepare and review exhibits for motions to compel re Durango Harvest, Inc. and Individual Defendants.	9/14/2023
		Time-341032	0.6	Draft motion to compel form interrogatories re Durango Harvest, Inc.	9/14/2023
		Time-341034	1.9	Draft and review final edits on motions to compel re Durango Harvest, Inc. and Individual Defendants.	9/14/2023
		Time-341084	0.6	Draft motions to compel re discovery production for Durango Harvest, Inc. and Individual Defendants.	9/15/2023
		Time-341249	1.4	Draft ADR information re PAGA process for clients in Spanish.	9/19/2023
		Time-341426	1.8	Research Belaire-West notice regarding defendant Seventh Tree Farm's response to plaintiff's special interrogatories.	9/28/2023
		Time-342365	0.3	Review discovery from Driscoll's	10/18/2023
		Time-342366	0.2	Review discovery received from Driscoll's.	10/19/2023
		Time-342367	3	Research Belaire-West Notice process	10/19/2023
		Time-342824	0.4	Research damages model	10/30/2023
		Time-342825	1.7	Review discovery production from Driscoll's.	10/30/2023
		Time-342822	1	Review discovery production from Driscoll's.	10/31/2023
		Time-342823	0.6	Research damages model	10/31/2023
		Time-342820	0.7	Research damages model	11/1/2023
		Time-342821	1.1	Review discovery production from Driscoll's.	11/1/2023
		Time-342819	2	Review discovery production from Driscoll's.	11/2/2023
		Time-342958	0.4	Research damages model	11/2/2023
		Time-342957	1.9	Review discovery production received from Driscoll's.	11/7/2023
		Time-343048	2.7	Review discovery production received from Driscoll's.	11/8/2023
		Time-343129	3.7	Review and tag discovery production from defendant Durango Harvest.	11/13/2023
		Time-343367	2.4	Review supplemental discovery from STF.	11/16/2023
		Time-343368	1	Review supplemental discovery from STF.	11/17/2023
		Time-343473	3.2	Review discovery produced by defendant STF.	11/20/2023
		Time-343657	4.3	Review and analyze discovery production from defendant Seven Tree Farm	11/21/2023
		Time-343655	6	Review and analyze discovery production set two from defendant, Seventh Tree Farm, Inc.	11/27/2023

Time-343688	2.5	Draft meet and confer letter re supplement production set one from defendant Seventh Tree Farm.	11/28/2023
Time-343877	1.3	Analyze supplemental discovery production from Seventh Tree Farm	11/30/2023
Time-344207	0.6	Draft fact investigation questions for plaintiffs	12/7/2023
Time-344504	0.4	Research PAGA penalties and damages.	12/13/2023
Time-344498	0.1	Research PAGA statute and penalties	12/14/2023
Time-344496	0.4	Confer with plaintiff, C. Vasquez, re facts	12/14/2023
Time-344497	0.3	Confer with plaintiff, F. Barrera, re facts	12/14/2023
Time-344500	0.2	Confer with various plaintiffs re facts	12/14/2023
Time-344541	0.3	Confer with N. Guevara Solano re facts	12/15/2023
Time-344547	2.5	Analyze production from defendant Seventh Tree Farm	12/15/2023
Time-344660	0.3	Confer with C. Mina Suarez re facts	12/15/2023
Time-344658	0.3	Confer with L. Salazar Tomas re facts	12/18/2023
Time-344659	0.2	Confer with M. Soledad Montoya re facts	12/18/2023
Time-344684	1	Analyze payroll records from defendant Seventh Tree Farm for labor code violations.	12/19/2023
Time-344690	0.6	Research labor code 226	12/19/2023
Time-344711	1.8	Analyze discovery from defendants re boxes harvested and submitted to coolers	12/19/2023
Time-344822	0.8	Analyze discovery from Driscoll's and Seventh Tree Farm re boxes submitted to the cooler.	12/20/2023
Time-345155	3	Analyze discovery from defendants re boxes harvested and submitted to coolers	1/2/2024
Time-345156	1.9	Analyze discovery from defendants re boxes harvested and submitted to coolers	1/2/2024
Time-345157	0.5	Research re amending PAGA notice	1/3/2024
Time-345161	0.6	Analyze STF's form interrogatories and admissions	1/3/2024
Time-345516	2	Analyze Driscoll's discovery production	1/3/2024
Time-345514	3.2	Analyze Driscoll's discovery production	1/4/2024
Time-345662	2.7	Draft meet and confer letter to Driscoll's re responses to requests for production set two.	1/5/2024
Time-346112	1.8	Research and review Civil Discovery Act re objections to requests for production.	1/11/2024
Time-346113	1	Draft meet and confer letter re Reiter's responses to plaintiff's first set of requests for production.	1/11/2024
Time-346115	1.3	Review Reiter's responses and objections to plaintiff's first set of requests for production.	1/11/2024
Time-346114	1.1	Draft and revise meet and confer letter re Driscoll's responses to plaintiff's first set of requests for production.	1/12/2024
Time-346376	0.4	Review defendant Reiter Affiliated Companies, LLC responses to plaintiff's requests for admission, set one.	1/12/2024
Time-346377	1.9	Review defendant Reiter Affiliated Companies, LLC responses to plaintiff's special interrogatories, set one.	1/12/2024
Time-346378	1.4	Review defendant Reiter Affiliated Companies, LLC responses to plaintiff's requests for production, set one.	1/12/2024
Time-346379	0.2	Review defendant Reiter Affiliated Companies, LLC responses to plaintiff's form interrogatories-general re employment, set one.	1/12/2024
Time-346385	0.3	Review defendant Duji Exchange, LLC's responses to plaintiff's requests for admission, set one.	1/16/2024
Time-346386	0.7	Draft meet and confer letter to defendant Driscoll's re responses to plaintiff's second set of discovery requests.	1/16/2024
Time-346387	1.4	Review defendant Duji Exchange, LLC's responses to plaintiff's requests for production, set one.	1/17/2024
Time-346391	1	Draft meet and confer letter re defendant Duji Exchange, LLC's responses to plaintiff's requests for production, set one.	1/17/2024
Time-346392	0.3	Review defendant Duji Exchange, LLC's responses to plaintiff's form and employment interrogatories set one.	1/17/2024
Time-346596	0.3	Revise meet and confer letter to Reiter Affiliated Companies, LLC and Duji Exchange, LLC re responses to plaintiff's first set of discovery requests	1/19/2024
Time-346723	0.2	Revise meet and confer letter to RAC and Duji re their responses to plaintiff's first set of discovery on them.	1/22/2024
Time-347204	1.6	Draft letter responding to defendants Reiter and Duji's response to plaintiff's meet and confer re first set of discovery responses.	1/31/2024
Time-347373	1	Confer with K. Ouillette, G. Warner, S. Neulight, and M. Garcia re Driscoll's responses to plaintiffs' set two of discovery requests.	2/1/2024
Time-347376	0.7	Draft response to defendants RAC and Duji re their responses to plaintiffs' meet and confer letter re requests for discovery set one.	2/1/2024
Time-347378	0.5	Draft follow up email regarding meet and confer to Driscoll's regarding discovery agreements.	2/2/2024
Time-347516	0.2	Confer with plaintiff re work performed	2/5/2024
Time-347519	1.6	Review and analyze supplemental discovery by defendant Seventh Tree Farm, Inc.	2/5/2024
Time-347520	0.2	Revise meet and confer letter to defendants RAC and Duji re their response to plaintiff's meet and confer re first set of discovery requests.	2/5/2024
Time-347674	3	Review and analyze supplemental discovery from defendant Seventh Tree Farm, Inc.	2/6/2024
Time-347839	3.9	Review and analyze discovery production from defendant STF.	2/8/2024
Time-347843	4.6	Review and analyze supplemental discovery from defendant STF.	2/9/2024
Time-347902	0.7	conduct legal research	2/9/2024
Time-348236	0.8	conduct legal research	2/13/2024

Time-348539	0.1	Confer with client M. Gonzalez re harvesting in Jan 2022.	2/20/2024
Time-348696	1.3	Analyze punch card data from Seventh Tree Farm re Saturday and Sunday work.	2/21/2024
Time-348723	2.3	Analyze punch card data from defendant Seventh Tree Farm re Saturday and Sunday work.	2/22/2024
Time-348787	3.6	Analyze data from punch cards from defendant Seventh Tree Farms re Saturday and Sunday work.	2/23/2024
Time-348999	0.2	Analyze defendant Seventh Tree Farm production	2/26/2024
Time-349006	0.9	Analyze crew sheets from defendant Seventh Tree Farms.	2/27/2024
Time-349600	2.1	Review and analyze discovery produced by defendants.	3/5/2024
Time-349917	2.1	Review and analyze punch cards from defendant Seventh Tree Farms.	3/7/2024
Time-349918	1.8	Draft meet and confer letter re defendant Seventh Tree's recent supplement production.	3/7/2024
Time-349959	2.6	Review and analyze punch cards produced by defendant Seventh Tree Farms.	3/8/2024
Time-349961	0.8	Draft meet and confer letter re production issues from defendant Seventh Tree re punch cards.	3/8/2024
Time-350396	1.5	Draft special interrogatories requests for defendant Reiter Affiliated Companies, LLC.	3/11/2024
Time-350481	0.2	Revise meet and confer letter re STF Further Responses to Plaintiff's Discovery Requests, Set One and Set Two.	3/13/2024
Time-350962	0.7	Revise and analyze plaintiffs' discovery plan.	3/15/2024
Time-352164	0.7	Confer with R. Gonzalez and S. Stratford-Jones re Durango Harvest's supplemental responses to plaintiff's first and second requests for production.	3/21/2024
Time-352196	0.3	Review and analyze discovery from Durango and Duji and RAC.	3/22/2024
Time-353368	3.3	Review and analyze punch card data	3/26/2024
Time-353377	3.9	Review and analyze punch card data for PAGA penalties calculations.	3/27/2024
Time-353718	0.2	Analyze discovery re pay checks	3/28/2024
Time-354043	0.1	Review and analyze overtime violations by defendant Seventh Tree Farm.	3/29/2024
Time-354202	4.4	Analyze and review PAGA overtime penalties.	4/2/2024
Time-354627	3.5	Analyze and calculate overtime violations.	4/3/2024
Time-355819	2.6	Review and analyze overtime violations by defendant Seventh Tree Farm.	4/8/2024
Time-356329	1.2	Review and analyze overtime PAGA violations.	4/9/2024
Time-356468	1.1	Review discovery regarding financial transactions between defendants and entities.	4/10/2024
Time-356471	0.5	Review and analyze overtime violations for PAGA penalties.	4/10/2024
Time-356475	0.3	Review overtime violations with K. Ouillette and financial transactions between entities.	4/10/2024
Time-357886	0.1	Email S. Stratford and R. Gonzalez re Individual Defendants' Supplemental Responses to Plaintiff's RFPs.	4/16/2024
Time-358190	0.3	Confer with N. Solano regarding wage theft	4/16/2024
Time-358710	0.2	Confer with L. Salazar re wage theft	4/17/2024
Time-358709	0.2	Confer with S. Salazar re wage theft facts	4/17/2024
Time-359194	0.3	Review and analyze individual defendants' supplemental responses to requests for production.	4/18/2024
Time-359195	0.4	Review and analyze Durango Harvest's supplemental production.	4/18/2024
Time-359196	0.2	Review and analyze Driscoll's supplemental production.	4/18/2024
Time-359204	1	Review and analyze defendant Durango Harvest's supplemental discovery production.	4/19/2024
Time-359243	0.7	Review and analyze defendant Driscoll's supplemental discovery production.	4/19/2024
Time-359285	0.3	Review Seven Tree Farm's answer to plaintiffs' second amended complaint.	4/19/2024
Time-361035	0.5	Review and analyze defendant Durango Harvest and Individual Defendants' answer to Plaintiffs' second amended complaint.	4/22/2024
Time-360862	0.3	Review defendant Driscoll's answer to plaintiffs' second amended complaint.	4/23/2024
Time-361817	1.5	Draft meet and confer letter to defendant Seventh Tree Farm regarding their further responses to Plaintiff's Set and Second Set of Requests for Production.	4/26/2024
Time-363714	0.3	Draft list of additional discovery requests for defendants following new information from defendants' depositions.	5/8/2024
Time-363718	0.5	Draft email to R. Gonzalez from Mullen regarding discovery requests following defendants' depositions.	5/8/2024
Time-365675	5.4	Review and analyze box count data from Defendants	5/20/2024
Time-365892	1.9	Review and analyze boxes harvested by workers at Goldberg and Stonebridge Ranch through crewsheets produced by Defendant Seventh Tree Farm.	5/21/2024
Time-366036	2	Review and analyze box records from Defendants	5/22/2024
Time-366135	0.3	Confer with Plaintiff L. Salazar Tomas regarding attending mediation in July and confidentiality agreement.	5/23/2024
Time-366156	0.2	Confer with Plaintiff S. Salazar Aguilar regarding attending mediation in July and confidentiality agreement.	5/23/2024
Time-366182	0.2	Confer with Plaintiff A. Maldonado Santiago regarding attending mediation in July and confidentiality agreement.	5/23/2024
Time-366183	0.1	Confer with Plaintiff C. Dolores Martinez regarding attending mediation in July and confidentiality agreement.	5/23/2024
Time-366195	0.2	Confer with Plaintiff M. Guzman regarding attending mediation in July and confidentiality agreement.	5/23/2024
Time-366283	0.1	Confer with Plaintiff F. Lopez Vasquez regarding Plaintiff C. Lopez Vasquez's contact information.	5/23/2024

Time-366284	0.2	Call Plaintiff C. Mina Suarez and Plaintiff M. Lopez Hernandez to discuss mediation	5/23/2024
Time-366417	0.2	Confer with Plaintiff C. Mina Suarez regarding mediation in July and confidentiality agreement.	5/28/2024
Time-366418	0.2	Confer with Plaintiff F. Lopez Vasquez regarding C. Lopez Vasquez's new contact information.	5/28/2024
Time-366835	0.3	Confer with Plaintiff C. Lopez Vasquez regarding mediation and confidentiality agreement.	5/28/2024
Time-366836	0.2	Confer with Plaintiff F. Galvez Barrera regarding mediation in July and confidentiality agreement.	5/28/2024
Time-367274	2.7	Draft mediation brief in preparation for July mediation with Defendants.	5/30/2024
Time-367830	0.1	Confer with Plaintiff M. Lopez Hernandez re mediation	6/4/2024
Time-368389	0.1	Confer with Plaintiff I. Sanchez Ortiz re mediation	6/5/2024
Time-368390	0.1	Confer with Plaintiff C. Lopez Vasquez re mediation	6/5/2024
Time-368889	0.5	Research re Defendants Driscoll's and Reiter Affiliated Companies.	6/6/2024
Time-368858	0.2	Confer w Plaintiff C. Mina Suarez re mediation	6/7/2024
Time-368859	0.1	Confer with Plaintiff C. Dolores Martinez re mediation	6/7/2024
Time-368860	0.1	confer with Plaintiff A. Maldonado Santiago re mediation	6/7/2024
Time-368861	0.1	Confer with Plaintiff M. Gonzalez Matias re mediation	6/7/2024
Time-368848	4.8	Travel to and from Oxnard, California for meeting with Plaintiffs in preparation of mediation in July.	6/9/2024
Time-368849	3	Discuss mediation scheduled for July and logistics with Plaintiffs in Oxnard.	6/9/2024
Time-369969	0.8	Discuss mediation with Plaintiff I. Sanchez Ortiz.	6/12/2024
Time-370232	0.6	Review data re boxes submitted to coolers	6/12/2024
Time-371193	0.2	Research Driscoll's standards re strawberry harvest	6/14/2024
Time-373161	0.2	Confer with Plaintiff I. Sanchez Ortiz re mediation	6/24/2024
Time-373164	4.4	Review and analyze Defendant Seventh Tree Farm crew sheets	6/24/2024
Time-372652	1.5	Review and analyze box data	6/26/2024
Time-373052	0.7	Review and analyze missing boxes	6/27/2024
Time-373349	0.6	Draft exhibit for Plaintiffs' mediation brief	6/28/2024
Time-373350	2.9	Review and analyze boxes harvested and paid out	6/28/2024
Time-374185	1.4	Review and make final edits on Plaintiffs' mediation brief.	7/5/2024
Time-375467	0.1	Review interpretation agreement for mediation on July 15.	7/10/2024
Time-375691	0.1	Confer with Plaintiff M. Lopez Hernandez regarding mediation on July 15 and interpretation services.	7/11/2024
Time-375692	0.1	Confer Plaintiff I. Sanchez Ortiz regarding mediation on July 15.	7/11/2024
Time-375693	0.1	Confer Plaintiff J. Fernando Ortiz regarding mediation on July 15.	7/11/2024
Time-375694	0.1	Confer with Plaintiff C. Lopez Vasquez regarding mediation on July 15.	7/11/2024
Time-375695	0.1	Remind Plaintiff C. Mina Suarez of mediation on July 15.	7/11/2024
Time-375700	0.2	Discuss interpretation services for Plaintiff L. Romero Rodriguez and reminders for Plaintiffs to attend the mediation on July 15.	7/11/2024
Time-375701	0.1	Remind Plaintiffs C. Dolores Martinez and A. Maldonado Santiago of mediation on July 15.	7/11/2024
Time-375889	0.2	Confer with Plaintiff M. Diego Gonzalez regarding mediation on July 15 and transportation options.	7/12/2024
Time-375890	0.2	Confer with Plaintiff F. Galvez Barrera regarding mediation on July 15 and how to connect virtually.	7/12/2024
Time-375902	0.1	Confer with P. Marcelina Diego Gonzalez regarding transportation for mediation on July 15.	7/14/2024
Time-375904	0.1	Confer with Plaintiff C. Dolores Martinez regarding attendance at mediation on July 15.	7/14/2024
Time-376002	3.8	Travel to Oxnard, California for mediation on July 15.	7/14/2024
Time-376328	7	Participate in mediation with H. Bongiovi and Defendants from CRLA Oxnard office.	7/15/2024
Time-376331	3.6	Travel from Oxnard, California to Santa Maria, California after mediation in CRLA's Oxnard office.	7/16/2024
Time-376361	0.1	Confer with F. Lopez Vasquez regarding mediation on July 15.	7/16/2024
Time-379853	0.8	Review discovery production from Defendant Seventh Tree Farm to confirm missing crew sheets from the relevant time period.	8/1/2024
Time-379855	0.2	Review and make edits to Plaintiff's special interrogatories to defendant Reiter Affiliated Companies, set one.	8/1/2024
Time-379856	0.2	Review and make edits to Plaintiff's special interrogatories to defendant Seventh Tree Farm, set two.	8/1/2024
Time-382444	0.3	Contact STF plaintiffs regarding mediation update.	8/15/2024
Time-383285	0.2	Review and edit plaintiff's request for production set two for defendant Reiter Affiliated Companies, LLC.	8/19/2024
Time-385007	0.4	Review and edit plaintiffs' response to defendant Duji's motion to strike.	9/3/2024
Time-386966	0.8	Review and analyze additional discovery from defendant Durango Harvest post-depositions.	9/10/2024
Time-386970	0.1	Confer with plaintiff C. Lopez Vasquez regarding depositions in October and availability.	9/10/2024
Time-387094	0.1	Call Plaintiff F. Lopez Vasquez regarding depositions.	9/11/2024

Time-387272	3.1	Review and analyze defendant's Duji supplemental production.	9/12/2024
Time-387305	1.9	Calculate PAGA damages for plaintiffs.	9/13/2024
Time-387307	0.6	Review and analyze supplement production from defendant Duji Exchange, LLC.	9/13/2024
Time-387309	0.2	Confer with F. Lopez Vasquez regarding depositions in late October or November.	9/13/2024
Time-387742	2.9	Review Plaintiffs' notes regarding missing boxes and wages from defendants Seventh Tree and Durango Harvest.	9/16/2024
Time-387743	0.1	Confer with Plaintiff C. Lopez Vasquez and F. Lopez Vasquez regarding depositions dates.	9/16/2024
Time-388662	0.8	Review plaintiff F. Galvez's notes regarding unpaid boxes.	9/19/2024
Time-388667	0.6	Review meet and confer to defendant Seventh Tree Farm regarding discovery post Mr. Hermocillo's deposition.	9/19/2024
Time-388790	0.6	Draft email to opposing counsel regarding pending discovery from defendant Seventh Tree Farm regarding plaintiff's requests for production s	9/20/2024
Time-388848	0.4	Review discovery from defendant Durango Harvest	9/20/2024
Time-389061	2.3	Review and analyze production produced by defendant Reiter Affiliated Companies.	9/23/2024
Time-389067	3	Review and analyze production produced by defendant Reiter Affiliated Companies.	9/24/2024
Time-389813	3.4	Review discovery production from defendant Reiter regarding plaintiff's request for production set one.	9/25/2024
Time-389802	3.8	Review discovery production from defendant Reiter regarding plaintiff's request for production set one.	9/26/2024
Time-389791	3.2	Review deficiencies in discovery produced by defendant Reiter regarding plaintiff's request for production set one.	9/27/2024
Time-389795	0.6	Draft sections of the meet and confer letter to defendants Duji and Reiter re plaintiff's request for production set one.	9/27/2024
Time-390555	2.8	Review and analyze payroll earning records from defendant Seventh Tree Farm regarding unpaid boxes to plaintiffs.	9/30/2024
Time-390570	2.4	Review and analyze payroll earning records and crew sheets from defendant Seventh Tree Farm regarding unpaid boxes to plaintiffs.	10/1/2024
Time-390914	2.8	Review and analyze defendant STF's payroll earnings data, crew sheets and Duji Exchange profile sheets to calculate plaintiffs' damages.	10/3/2024
Time-391128	0.2	Confer with K. Ouillette and S. Payne plaintiff's letter to Reiter and Duji regarding their responses to plaintiffs' requests for production.	10/7/2024
Time-391349	0.5	Review defendant Durango's requests for production set one with plaintiff C. Lopez Vasquez.	10/8/2024
Time-391354	0.1	Confer with plaintiff N. Guevara Solano regarding responding to defendant Durango's requests for production set one.	10/8/2024
Time-391355	0.4	Review defendant Durango's requests for production set one.	10/8/2024
Time-391527	0.9	Review defendant Durango's requests for production set one with plaintiff J. Fernando Ortiz.	10/9/2024
Time-391531	0.8	Review and analyze pay rates	10/9/2024
Time-391651	0.2	Review defendant Durango's requests for production set one for appointment with plaintiff F. Lopez Vasquez.	10/10/2024
Time-392872	0.4	Review defendant Durango's requests for production, set one with plaintiff F. Vasquez Lopez.	10/15/2024
Time-393086	0.4	Attend meet and confer with K. Ouillette, A. Preciado, S. Payne, S. Neulight, P. Moody regarding trial setting conference joint statement.	10/16/2024
Time-393087	0.9	Prepare for plaintiffs' depositions.	10/16/2024
Time-393194	0.1	Confer with plaintiff N. Guevara Solano regarding appointment to discuss defendant Durango's requests for production, set one.	10/17/2024
Time-393195	0.1	Confer with plaintiff M. Guzman regarding appointment to discuss defendant Durango's requests for production, set one.	10/17/2024
Time-393272	1	Prepare for plaintiffs' depositions.	10/18/2024
Time-393276	0.4	Discuss defendant Durango's requests for production, set one with plaintiff N. Guevara Solano.	10/18/2024
Time-393277	0.4	Draft document requests for the deposition of B. Orozco.	10/18/2024
Time-393403	0.4	Discuss defendant Durango's requests for production set one with plaintiff M. Guzman.	10/21/2024
Time-393406	0.2	Draft requests for documents for B. Orozco's deposition.	10/21/2024
Time-393789	0.3	Discuss defendant Durango's requests for production set one with plaintiff I. Sanchez Ortiz.	10/22/2024
Time-393792	0.1	Confer with Plaintiff J. Fernando Ortiz	10/22/2024
Time-393794	0.1	Confer with plaintiff F. Lopez Vasquez re Durango's requests for production set one.	10/22/2024
Time-393896	0.3	conduct fact investigation	10/23/2024
Time-394052	0.3	Review and analyze discovery from Driscoll's	10/24/2024
Time-394209	0.3	Review defendant Driscoll's and Durango's requests for production set one.	10/25/2024
Time-394213	0.2	Review Driscoll's production	10/25/2024
Time-396055	0.9	Update discovery plan	11/6/2024
Time-396348	0.2	Review supplement discovery from defendants O. Hermocillio, C. Balderas and P. Medina.	11/8/2024
Time-396994	1.5	Prepare Plaintiff A. Maldonado Santiago for his deposition in Santa Barbara with co-counsel A. Preciado.	11/11/2024
Time-397000	0.3	Discuss settlement with R. Gonzalez	11/12/2024
Time-397596	0.1	Review and analyze production from defendant Durango Harvest in Everlaw.	11/14/2024
Time-397610	0.4	Review L. Cauldron's deposition questions	11/15/2024
Time-398126	0.2	Discuss defendant Durango Harvest's request for production set one with J. Ortiz.	11/18/2024
Time-398127	0.2	Review and analyze defendant Reiter Affiliated Companies, LLC's production regarding the deposition of L. Cauldron.	11/18/2024

	Time-398451	0.2	Discuss upcoming deposition and prep session with plaintiff F. Vasquez.	11/21/2024
	Time-398450	0.1	Discuss upcoming deposition and prep session with plaintiff C. Vasquez.	11/21/2024
	Time-398814	0.7	Prepare for depositions of plaintiffs C. Vasquez and F. Vasquez	11/22/2024
	Time-399490	0.2	Discuss the postponement of plaintiffs's depositions with plaintiffs C. Lopez Vasquez and F. Lopez Vasquez.	11/29/2024
	Time-399596	0.3	Review defendant Duji Exchange and Reiter Affiliated Companies' demurrer.	12/2/2024
	Time-400079	0.3	Review plaintiff A. Santiago's deposition transcript.	12/4/2024
	Time-400423	0.8	Review and analyze supplemental production from defendant Reiter Affiliated Companies, LLC.	12/5/2024
	Time-400451	1.9	Review plaintiff A. Santiago's deposition transcript for errors	12/6/2024
	Time-400454	0.8	Review and analyze supplemental production from defendant Reiter Affiliated Companies, LLC.	12/6/2024
	Time-401392	1.5	Review second supplemental production from defendant Reiter Affiliated Companies, LLC for issues and gaps.	12/9/2024
	Time-401394	1.1	Review and analyze second supplemental production from defendant Reiter Affiliated Companies, LLC.	12/9/2024
	Time-400890	0.8	Review and analyze second supplemental production from defendant Reiter Affiliated Companies, LLC.	12/10/2024
	Time-401803	1.2	Confer with witness regarding work conditions at Seventh Tree Farms.	12/16/2024
	Time-402008	0.5	Analyze strawberry boxes submitted to coolers during the relevant time period.	12/17/2024
	Time-404666	0.5	Draft meet and confer letter to defendants Reiter Affiliated Companies and Duji Exchange regarding supplement production deficiencies.	1/14/2025
	Time-404680	1.1	Draft meet and confer letter regarding defendants Reiter Affiliated Companies and Duji Exchange's supplemental production deficiencies.	1/15/2025
	Time-409062	0.2	Review affirmative relief posting notice for defendants Seventh Tree Farms and Durango Harvest.	2/11/2025
	Time-410601	0.2	Review affirmative relief from defendants Seventh Tree Farms and Durango Harvest.	2/20/2025
	Time-411278	0.2	Share case update with plaintiffs	2/26/2025
	Time-411280	0.3	Communicate with plaintiffs re settlement	2/26/2025
	Time-411255	0.5	Communicate with plaintiffs re settlement	2/27/2025
	Time-411258	0.4	Communicate with plaintiffs re settlement	2/27/2025
	Time-411261	0.1	Communicate with plaintiffs re settlement	2/27/2025
	Time-411307	0.1	Communicate with plaintiffs re settlement	2/28/2025
	Time-411308	0.2	Communicate with plaintiffs re settlement	2/28/2025
	Time-411398	1	Communicate with plaintiffs re settlement	2/28/2025
	Time-411400	0.2	Communicate with plaintiffs re settlement	2/28/2025
	Time-411401	0.4	Communicate with plaintiffs re settlement	2/28/2025
	Time-411405	0.2	Communicate with plaintiffs re settlement	2/28/2025
	Time-411413	0.1	Communicate with plaintiffs re settlement	2/28/2025
	Time-412456	0.2	Communicate with plaintiffs re settlement	3/5/2025
	Time-412457	0.2	Communicate with plaintiffs re settlement	3/5/2025
	Time-412754	0.4	Communicate with plaintiffs re settlement	3/7/2025
	Time-413355	1	Draft motion for PAGA settlement approval.	3/14/2025
	Time-413958	0.8	Draft motion for PAGA settlement approval.	3/18/2025
	Time-414628	0.3	Communicate with plaintiffs re settlement	3/20/2025
	Time-414639	0.3	Communicate with plaintiffs re settlement	3/21/2025
	Time-415131	0.1	Communicate with plaintiffs re settlement	3/24/2025
	Time-415438	0.7	Draft motion for PAGA settlement approval.	3/27/2025
	Time-415441	0.1	Confer with plaintiff I. Sanchez regarding settlement	3/27/2025
	Time-416359	1.9	Draft motion for PAGA settlement approval.	4/1/2025
	Time-416362	0.1	Confer with plaintiff F. Galvez Barrera re settlement	4/1/2025
	Time-416366	0.7	Draft motion for PAGA settlement approval.	4/2/2025
	Time-417160	0.5	Draft motion for PAGA settlement approval.	4/4/2025
Subtotal	Sum	305.2		
Alexx Campbell	Time-327509	0.5	Conduct fact investigation	10/5/2022
	Time-327866	4	Meet with potential clients and conduct fact investigation	10/21/2022
	Time-327867	2	Travel from Oxnard back to Santa Barbara.	10/21/2022

Time-327869	5	Travel to Oxnard, via SBA	10/21/2022
Time-327870	3.5	Travel from SBA back to San Francisco.	10/22/2022
Time-327402	0.5	Review worker evidence	11/1/2022
Time-327428	2.3	Meet with potential clients and conduct fact investigation	11/2/2022
Time-328225	1.8	Create template calculations spreadsheet	11/18/2022
Time-328224	2.5	Create template calculations spreadsheet and process for data entry	11/20/2022
Time-328222	1	Confer with client re facts	11/28/2022
Time-328381	1	Review worker notes and evidence.	11/30/2022
Time-328383	0.5	Review documentary evidence	11/30/2022
Time-328446	3.5	Calculate damages for multiple clients.	12/2/2022
Time-328669	0.7	Review and edit calculations spreadsheets for Lorenzo Romero Ramirez and Fidel Galvez Barrera	12/6/2022
Time-328799	3.3	Review and draft calculations spreadsheets for multiple clients.	12/8/2022
Time-328833	2.5	Review and draft calculations spreadsheets and conduct employer research	12/8/2022
Time-328836	0.7	Review and finalize calculations for Cecilia Dolores Martinez.	12/9/2022
Time-328975	0.6	Edit and add to calculations for Candido Lopez Vazquez.	12/13/2022
Time-328996	1.5	Draft and edit calculations spreadsheets for multiple clients.	12/13/2022
Time-329060	3.8	Draft and edit calculations spreadsheets; call clients to confirm information/details.	12/15/2022
Time-329097	3	Update/revise calculations for multiple clients.	12/16/2022
Time-329142	2	Finalize calculations and revise demand letter.	12/16/2022
Time-329146	0.7	Update demand letter with calculations amounts, make other revisions to demand letter.	12/19/2022
Time-329315	0.5	Review final draft of demand letter; make some final changes.	12/21/2022
Time-330129	0.5	Review draft PAGA letter.	1/11/2023
Time-330175	0.5	Review and make edits to draft PAGA letter.	1/12/2023
Time-330408	1	Research potential claims	1/18/2023
Time-330665	0.4	Research potential claims	1/24/2023
Time-330726	2.7	Conduct research re employers	1/25/2023
Time-330922	2	Research potential claims	1/30/2023
Time-330923	0.3	Conduct research re employers	1/30/2023
Time-331009	0.2	Review draft litigation retainer	2/1/2023
Time-331184	0.4	Draft amended PAGA letter	2/6/2023
Time-331438	0.4	Call with counsel for Reiter Brothers, Inc. and Reiter Affiliated Companies - Ana Toledo	2/10/2023
Time-331439	0.5	Conduct legal research re client employer liability.	2/10/2023
Time-332256	0.2	Call with Ana Toledo, counsel for RBI/RAC re letter	3/2/2023
Time-332258	0.4	Draft email to A. Toledo	3/2/2023
Time-332335	0.3	Draft second amended PAGA letter	3/7/2023
Time-332618	2	Review and edit draft Complaint.	3/10/2023
Time-335195	2.4	Draft discovery requests to Seventh Tree Farm, Inc.	4/27/2023
Time-335200	1.4	Draft discovery requests to Durango Harvest, Inc.	4/28/2023
Time-335516	0.3	Draft and send email to Jesus Pereda re Notices and Acknowledgments of Receipt, and e-service going forward.	5/8/2023
Time-335531	0.2	Draft and send emails to counsel for Driscoll's, Inc. re Notice and Acknowledgments of Receipt, and e-service going forward.	5/8/2023
Time-335576	1.7	Draft and edit discovery requests to Driscoll's, Inc.	5/8/2023
Time-336438	1.3	Finalize Seventh Tree Farm, Inc. and Durango Harvest, Inc. requests.	5/26/2023
Time-336439	0.1	Review final drafts of discovery requests to Driscoll's.	5/26/2023
Time-336596	0.5	Review Driscoll's discovery requests to Plaintiffs	5/31/2023
Time-336601	2.1	Draft responses to Driscoll's discovery requests	6/1/2023
Time-336642	1.6	Confer with Plaintiffs re responses to Driscoll's discovery requests	6/2/2023
Time-336675	1	Confer with Plaintiffs re responses to Driscoll's discovery requests	6/4/2023
Time-336676	1.5	Confer with Plaintiffs re responses to Driscoll's discovery requests	6/5/2023
Time-336722	0.8	Draft responses to Driscoll's discovery requests	6/5/2023
Time-337239	1.8	Interview with Nieves Guevara Solano, re responses to Driscoll's, Inc. discovery requests.	6/12/2023
Time-337248	2	Interview Fidel Galvez Barrera re responses to Driscoll's, Inc.'s discovery requests.	6/13/2023

Time-337254	1.5	Interview Marcelina Diego Gonzalez re responses to Driscoll's, Inc. discovery requests.	6/14/2023
Time-337260	2	Collect documents responsive to Driscoll's discovery requests	6/15/2023
Time-337559	0.8	Collect documents responsive to Driscoll's discovery requests	6/16/2023
Time-337563	1.3	Confer with Jose Fernando Ortiz re discovery requests.	6/16/2023
Time-337342	1.2	Collect and sort responsive documents to prepare responses to Driscoll's, Inc. discovery requests.	6/20/2023
Time-337416	3	Collect and sort responsive documents to prepare responses to Driscoll's, Inc. discovery requests.	6/22/2023
Time-337580	2	Draft RFA and FROG responses	6/22/2023
Time-337583	3.1	Draft RFA and FROG responses	6/23/2023
Time-337814	1.4	Interview client Isidro Sanchez Ortiz re responses to Driscoll's, Inc. discovery requests.	6/25/2023
Time-337603	0.3	Draft RFA and FROG responses to Driscoll's, Inc.	6/26/2023
Time-337611	0.5	Draft RFA and FROG responses to Driscoll's, Inc.	6/26/2023
Time-337936	1.5	Draft discovery response docs - RFPS, RFAs and FROGs.	6/28/2023
Time-337950	0.5	Collect and sort responsive documents to prepare responses to Driscoll's, Inc. discovery requests.	6/30/2023
Time-337951	0.5	Draft RFP responses	6/30/2023
Time-338092	0.6	Call Isidro Sanchez Ortiz and Jose Fernando Ortiz res responding to Driscoll's discovery requests	7/4/2023
Time-338093	1.5	Draft RFP responses	7/4/2023
Time-338107	1.8	Review and redact document production	7/4/2023
Time-338246	0.8	Confer with Plaintiffs re responses to Driscoll's discovery requests	7/5/2023
Time-338249	1	Review draft discovery response docs with Isidro Sanchez Ortiz.	7/6/2023
Time-338533	1.2	Review final drafts of discovery response docs and document production.	7/7/2023
Time-339771	2.1	Review Seventh Tree Farm, Inc. document production	8/14/2023
Time-341504	0.6	Call with Ana Toledo, counsel for RAC and Duji Exchange	10/2/2023
Time-342100	0.3	Conduct legal research	10/3/2023
Time-342041	1	Review and edit draft discovery requests to Duji Exchange and RAC.	10/12/2023
Time-342852	1	Review and code Seventh Tree Farm, Inc.'s document production.	11/2/2023
Time-343490	2	Review and tag Seventh Tree Farm Inc.'s discovery production.	11/8/2023
Time-343493	1.5	Review and tag Seventh Tree Farm Inc.'s discovery production.	11/9/2023
Time-343228	1.5	Confer with plaintiffs re case updates	11/14/2023
Time-343598	1.7	Review of Seventh Tree Farm Inc.'s discovery production.	11/27/2023
Time-343809	0.5	Review Seventh Tree Farm Inc's discovery production.	11/28/2023
Time-343804	3.7	Review and analyze Seventh Tree Farm Inc.'s discovery production.	11/29/2023
Time-344747	0.2	Conduct legal research re PAGA	12/19/2023
Time-344779	0.7	Conduct legal research re PAGA	12/20/2023
Time-345680	0.2	Call with opposing counsel Ana Toledo (RAC/Duji) re CMC statement	1/5/2024
Time-345675	0.6	Draft second amended complaint.	1/8/2024
Time-345936	1.1	Draft Second Amended Complaint and Stipulation/Proposed Order to file SAC.	1/10/2024
Time-346013	0.4	Review RAC discovery production	1/11/2024
Time-347248	0.7	Review and make final edits to proposed Second Amended Complaint and Stipulation.	1/25/2024
Time-348181	0.9	Create spreadsheet for damages calculation	2/2/2024
Time-348182	0.4	Review and edit draft Stipulation to file Second Amended Complaint	2/2/2024
Time-348207	0.9	Attend case management conference	2/7/2024
Time-348223	0.6	Review STF production.	2/8/2024
Time-348660	0.6	Review Seventh Tree Farm punch card production and enter data into audit spreadsheet.	2/21/2024
Time-348666	0.7	Review Seventh Tree Farm punch card production and enter data into audit spreadsheet.	2/21/2024
Time-348687	1	Review Seventh Tree Farm punch card production and enter data into audit spreadsheet.	2/21/2024
Time-349414	1.8	Create final version of stipulation and redlined Second Amended Complaint; circulate to opposing counsel for signatures.	3/4/2024
Time-350166	0.2	Call with Rafael Gonzalez at Mullen Law re signing stipulation and date for meet and confer re discovery responses.	3/12/2024
Time-355341	1	Review and edit draft deposition outline for Omar Hermocillo.	4/7/2024
Time-358858	0.2	Review notes evidence from clients	4/18/2024
Time-358879	0.6	Draft deposition outline for Patricia Medina.	4/18/2024
Time-359986	1.1	Draft deposition outline for Patricia Medina deposition.	4/22/2024

Time-360506	0.9	Draft deposition outline for Patricia Medina deposition.	4/22/2024
Time-361107	1.2	Draft deposition outline for Patricia Medina deposition.	4/23/2024
Time-361165	1.8	Draft deposition outline for Patricia Medina deposition.	4/23/2024
Time-361232	0.7	Draft deposition outline for Patricia Medina deposition.	4/23/2024
Time-361523	1	Draft deposition outline for Patricia Medina deposition.	4/24/2024
Time-361524	1.6	Draft deposition outline for Patricia Medina deposition.	4/24/2024
Time-361525	3	Draft deposition outline for Patricia Medina deposition.	4/24/2024
Time-362506	0.5	Prepare deposition outline for Patricia Medina deposition.	4/26/2024
Time-364665	0.5	Review and collect exhibits for P. Medina deposition	5/1/2024
Time-364673	0.3	Review documents to be used for Patricia Medina deposition.	5/2/2024
Time-364676	3.5	Prepare deposition outline for Patricia Medina deposition.	5/2/2024
Time-364689	0.9	Prepare deposition outline for Patricia Medina deposition.	5/5/2024
Time-364690	2	Prepare deposition outline for Patricia Medina deposition.	5/5/2024
Time-364691	4	Travel to Oxnard for depositions of Patricia Medina and Omar Hermocillo.	5/5/2024
Time-364694	1.5	Prepare deposition outline for Patricia Medina deposition.	5/5/2024
Time-364696	0.5	Travel to CRLA Oxnard office for deposition of Omar Hermocillo.	5/6/2024
Time-364698	3	Attend deposition of Omar Hermocillo.	5/6/2024
Time-364699	4.3	Attend deposition of Omar Hermocillo.	5/6/2024
Time-364701	2.5	Travel back from Patricia Medina deposition.	5/7/2024
Time-364704	3	Take deposition of Patricia Medina.	5/7/2024
Time-364702	2	Take deposition of Patricia Medina.	5/7/2024
Time-364703	0.5	Travel to Patricia Medina deposition.	5/7/2024
Time-364705	1.5	Travel from Oxnard to Santa Barbara, returning from Patricia Medina deposition.	5/7/2024
Time-366821	0.2	Review PAGA penalties calculation	5/28/2024
Time-373067	1.5	Review and edit mediation brief.	6/27/2024
Time-376112	2.6	Participate in mediation.	7/15/2024
Time-376147	4.2	Participate in mediation.	7/15/2024
Time-388269	0.5	Review discovery request documents from Durango Harvest; draft email requesting extension of RFP deadlines.	9/16/2024
Time-390473	1.4	Review Durango Harvest RFPs to Plaintiffs	9/18/2024
Time-390529	0.3	Call with opposing counsel Sean Stratford-Jones re deposition dates and deadlines for discovery responses	9/26/2024
Time-390524	1	Confer with plaintiffs re documents responsive to Durango Harvest's RFPs.	9/26/2024
Time-391860	0.3	Confer with plaintiffs re documents responsive to Durango Harvest's RFPs.	10/3/2024
Time-391861	1.7	Draft responses to Durango Harvest's RFPs.	10/3/2024
Time-391863	1.6	Draft responses to Durango Harvest's RFPs.	10/3/2024
Time-391872	1	Draft responses to Durango Harvest's RFPs.	10/4/2024
Time-391870	0.7	Draft responses to Durango Harvest's RFPs.	10/4/2024
Time-391871	0.3	Confer with Plaintiffs re responses to Durango Harvest RFPs	10/4/2024
Time-391159	1.3	Collect and review documents responsive to Durango Harvest's RFPs, Set One.	10/7/2024
Time-391162	1	Draft responses to Durango Harvest's RFPs.	10/7/2024
Time-391187	0.2	Discuss scheduling of depositions with Sean Stratford-Jones @ Mullen Law.	10/7/2024
Time-391877	0.8	Draft responses to Durango Harvest's RFPs.	10/7/2024
Time-395077	1.8	Review and edit Third Amended Complaint.	10/16/2024
Time-395093	0.6	Identify and gather existing documents responsive to Durango Harvest's RFPs.	10/18/2024
Time-395107	0.6	Identify and gather existing documents responsive to Durango Harvest's RFPs.	10/22/2024
Time-395133	0.3	Identify documents responsive to Durango Harvest's RFPs.	10/24/2024
Time-396848	1	Draft responses to Durango Harvest's RFPs.	10/28/2024
Time-396854	0.6	Draft responses to Durango Harvest's RFPs.	10/28/2024
Time-396858	1.2	Draft responses to Durango Harvest's RFPs.	10/29/2024
Time-396861	0.3	Draft responses to Durango Harvest's RFPs.	10/29/2024
Time-396863	2.2	Draft responses to Durango Harvest's RFPs.	10/29/2024
Time-396867	2	Draft responses to Durango Harvest's RFPs.	10/29/2024

		Time-396901	0.3	Draft and send email to co-counsel re discovery and potential motion to compel.	11/7/2024
		Time-400406	0.4	Collect verifications for Plaintiffs' responses to Durango Harvest's RFPs, Set One, and send via email to all counsel.	11/26/2024
		Time-409353	0.5	Review affirmative relief proposal	2/11/2025
Subtotal	Sum		207.3		
	RATE				
	TOTAL				
	Count				
George Alejandro Warner	Time-330773	1.3	Research potential claims		1/26/2023
	Time-336362	0.7	Review and revise responses to Driscoll's Requests for Admission		5/25/2023
	Time-336368	0.5	Conduct legal research		5/26/2023
	Time-336517	0.7	Research translation of verifications.		5/31/2023
	Time-336524	0.3	Conduct legal research		6/1/2023
	Time-337209	0.6	Review protective order and provide recommendation re proposed draft		6/16/2023
	Time-339005	0.4	Review discovery produced by Driscoll's.		7/20/2023
	Time-339008	0.3	Conduct research on Reiter affiliated entities.		7/20/2023
	Time-339201	0.6	Review Driscoll's discovery responses for adequacy of response.		7/26/2023
	Time-339524	0.9	Review discovery responses from Seventh Tree Farms.		8/2/2023
	Time-339717	1.4	Draft meet and confer letter for Driscoll's.		8/10/2023
	Time-339900	1.4	Review discovery to update list of relevant persons and identify hot documents		8/18/2023
	Time-339985	0.3	Review discovery responses by individual defendants and Durango Harvest.		8/21/2023
	Time-340274	1.2	Draft meet and confer letter regarding discovery responses.		8/24/2023
	Time-340278	0.4	Conduct research into unverified responses to Civil Discovery Act.		8/24/2023
	Time-340272	1.3	Draft meet and confer letter regarding discovery responses of individual defendants and Durango.		8/25/2023
	Time-340277	0.3	Conduct research into unverified responses to Civil Discovery Act.		8/25/2023
	Time-340782	0.9	Draft motion to compel responses to general form interrogatories.		9/9/2023
	Time-340850	0.7	Review declaration in support of motion to compel requests for production.		9/11/2023
	Time-340851	1.1	Review motion to compel requests for production.		9/11/2023
	Time-340853	0.4	Draft email to Driscoll's counsel regarding discovery obligations when stating that no responsive documents exist.		9/11/2023
	Time-340923	0.6	Review and revise memorandum of law in support of motion to compel special interrogatories.		9/12/2023
	Time-340924	1.3	Draft additional requests for production to serve on Driscoll's, Inc.		9/12/2023
	Time-340926	0.2	Call opposing counsel regarding stipulation to amend complaint.		9/12/2023
	Time-340928	0.6	Review and revise declaration in support of motion to compel requests for production.		9/12/2023
	Time-340927	0.7	Review and revise memorandum of law in support of motion to compel Requests for Production.		9/12/2023
	Time-340929	0.4	Review and revise memorandum of law in support of motion to compel form interrogatories -- general.		9/12/2023
	Time-340987	0.3	Draft and edit email to opposing counsel regarding responses to requests for production.		9/13/2023
	Time-340985	0.2	Revise declaration accompanying motion to compel requests for production.		9/13/2023
	Time-340984	0.7	Revise motion accompanying motion to compel requests for production.		9/13/2023
	Time-340986	0.4	Revise memorandum of law accompanying motion to compel special interrogatories.		9/13/2023
	Time-340996	0.4	Revise declaration accompanying motion to compel special interrogatories.		9/13/2023
	Time-340980	0.3	Revise declaration accompanying motion to compel form employment interrogatories.		9/14/2023
	Time-340989	0.3	Review and revise motion to compel requests for admission.		9/14/2023
	Time-340981	0.3	Revise memorandum of law accompanying motion to compel form employment interrogatories.		9/14/2023
	Time-340983	0.3	Revise declaration accompanying motion to compel requests for production.		9/14/2023
	Time-340990	0.2	Review and revise declaration to motion to compel requests for admission.		9/14/2023
	Time-341021	0.6	Revise requests for production for Driscoll's, Set Two.		9/14/2023
	Time-341133	0.1	Review proposed stipulation.		9/18/2023
	Time-341134	0.4	Review draft discovery requests to Driscoll's.		9/18/2023
	Time-341142	1.3	Draft requests for production from Duji Exchange.		9/18/2023
	Time-341144	0.4	Draft special interrogatories from Duji Exchange.		9/18/2023
	Time-341679	0.2	Review RFPs for Driscoll's.		10/5/2023
	Time-341680	0.4	Review draft discovery prepared for Duji Exchange.		10/5/2023

	Time-341695	0.2	Revise requests for production for Driscoll's.	10/5/2023
	Time-342031	0.1	Email opposing counsel regarding discovery dispute with Driscoll's.	10/12/2023
	Time-342538	1.1	Revise Requests for Production (.7), Requests for Admission (.2), and Special Interrogatories (.2) for Duji Exchange, LLC.	10/25/2023
	Time-345765	0.2	Review documents produced by RAC.	1/9/2024
	Time-345829	2.1	Revise meet and confer letter regarding Driscoll's responses to second request for production	1/9/2024
	Time-360445	0.4	Review discovery responses regarding ESI.	1/15/2024
	Time-347308	1	Meet and confer with opposing counsel regarding second set of requests for production.	2/1/2024
	Time-360476	0.7	Conduct legal research	2/8/2024
	Time-350625	0.2	Send email to co-counsel regarding opposing counsel's request for stay of discovery.	3/13/2024
	Time-352682	0.9	Research case law re Labor Code 226	3/25/2024
	Time-372922	0.6	Review and revise mediation brief.	6/27/2024
	Time-373034	0.8	Revise section on joint employment in mediation brief.	6/27/2024
	Time-373603	0.7	Review and revise mediation brief.	7/1/2024
	Time-380259	0.4	Revise interrogatories for RAC.	8/5/2024
	Time-384100	0.8	Revise memorandum of law for motion to strike.	8/26/2024
	Time-386427	0.2	Draft email to opposing counsel regarding upcoming depositions.	9/6/2024
	Time-392736	0.2	Instruct V. Sprague regarding preparation of subpoena for B. Orozco.	10/11/2024
	Time-392738	0.2	Review deposition subpoena of L. Calderon	10/11/2024
	Time-392704	0.7	Review deposition subpoena.	10/15/2024
	Time-392724	0.8	Review evidence re L. Calderon	10/15/2024
	Time-392989	1.1	Review deposition outline for deposition of Luis Calderon.	10/16/2024
	Time-393305	0.2	Review subpoena for B. Orozco.	10/18/2024
	Time-393525	2.3	Review documents to prepare for deposition.	10/21/2024
	Time-393526	2.3	Draft deposition outline.	10/21/2024
	Time-393688	0.6	Review B. Orozco subpoena (.3); identify service address for B. Orozco. (.3)	10/22/2024
	Time-393691	1.1	Review contracts for L. Calderon deposition.	10/22/2024
	Time-393699	0.6	Draft deposition outline.	10/22/2024
	Time-393749	0.2	Review emails related to service of subpoenas and scheduling of deposition.	10/23/2024
	Time-393853	1.1	Review documents to prepare for L. Calderon deposition.	10/23/2024
	Time-394039	2.8	Review Driscoll's production in Everlaw.	10/24/2024
	Time-394041	0.8	Prepare documents for deposition of Luis Calderon.	10/24/2024
	Time-394235	1.8	Review productions to prepare for deposition of L. Calderon.	10/25/2024
	Time-394236	2.6	Revise deposition outline for deposition of L. Calderon.	10/25/2024
	Time-394669	0.4	Draft deposition outline.	10/28/2024
	Time-396459	1.7	Draft deposition outline for L. Calderon deposition.	11/5/2024
	Time-396463	2.7	Draft deposition outline for L. Calderon deposition.	11/7/2024
	Time-396467	2.1	Draft deposition outline.	11/8/2024
	Time-396289	2.7	Revise deposition outline for L. Calderon.	11/10/2024
	Time-396290	0.9	Review binder of possible exhibits for deposition of L. Calderon.	11/10/2024
	Time-400692	3.1	Review documents in everlaw related to Luis Calderon and the responsibilities of RAC.	11/12/2024
	Time-397120	0.3	Review documents related to deposition.	11/13/2024
	Time-400691	2.1	Revise deposition outline for Luis Calderon deposition.	11/14/2024
	Time-400690	3.6	Revise deposition outline for Luis Calderon and review documents for deposition	11/15/2024
	Time-399180	4.5	Travel to deposition.	11/17/2024
	Time-399181	1.1	Review deposition outline for deposition of L. Calderon.	11/17/2024
	Time-398735	8.5	Take deposition of L. Calderon.	11/18/2024
	Time-400015	0.6	Conduct legal research re withdrawal of counsel of corporation.	12/4/2024
Subtotal	Sum	90.4		

Kim Ouillette	Time-327413	2.5	Review records from clients and evaluate potential claims	11/2/2022
	Time-327460	3	Review of records from workers; evaluate potential claims	11/3/2022
	Time-327640	0.5	Draft records request letter on behalf of 12 clients	11/8/2022
	Time-327641	0.2	Draft intake questions and format for fact investigation	11/8/2022
	Time-327898	1	Call with clients to investigate facts and basis for claims.	11/16/2022
	Time-327991	3	Confer with clients to obtain facts for claims and calculations	11/18/2022
	Time-328043	0.5	Client interview re facts and calculation of damages	11/21/2022
	Time-328044	2	Calculate damages	11/21/2022
	Time-328131	1.5	Client interviews to gather facts, evaluate claims	11/22/2022
	Time-328132	3	Calculate claims and damages for 2 workers	11/22/2022
	Time-328259	0.6	Client interview re factual basis for claims	11/28/2022
	Time-328260	0.7	Client interview re factual basis for claims	11/28/2022
	Time-328270	0.4	Interview with client to gather facts	11/29/2022
	Time-328327	0.5	Interview with worker client regarding factual basis for claims and calculations	11/30/2022
	Time-328328	1.5	Evaluate facts and calculate wage and hour damages.	11/30/2022
	Time-328401	0.7	Conduct legal research re joint employment liability.	12/2/2022
	Time-328554	0.6	Conduct worker interview re facts and claims	12/5/2022
	Time-328555	0.3	Review legal research re joint employment issues	12/5/2022
	Time-328689	0.4	Draft email response to O. Hermocillo re records production.	12/7/2022
	Time-328690	0.3	Draft demand letter - summary of facts section	12/7/2022
	Time-328692	0.2	Confirm damages calculations for Carmen Mina Suarez.	12/7/2022
	Time-328702	0.5	Calculate damages for Maydeli Guzman	12/7/2022
	Time-328795	1.6	Calculate wage and hour damages for Jose Ortiz	12/8/2022
	Time-328826	1	Calculate wage and hour damages for Candido Lopez	12/8/2022
	Time-328970	2	Evaluate facts and calculate wage and hour damages for clients	12/12/2022
	Time-328973	0.3	Review employment records received from employer	12/13/2022
	Time-329001	2	Evaluate claims and calculate wage and hour damages	12/14/2022
	Time-329018	0.1	Draft email response to ER Omar Hermocillo	12/14/2022
	Time-329019	2	Calculate wage and hour damages	12/14/2022
	Time-329025	1	Calculate wage and hour damages	12/14/2022
	Time-329064	1	Draft and edit demand letter	12/15/2022
	Time-329065	1	Evaluate facts and calculate wage and hour damages	12/15/2022
	Time-329103	1	Calculate wage and hour damages, edit demand letter	12/16/2022
	Time-329131	2.5	calculate wage and hour damages and draft and edit demand letter with corresponding values and dates	12/16/2022
	Time-329138	0.8	Draft and edit demand letter with updated damages calculations for each worker	12/19/2022
	Time-329417	1	Updating calculations of wage and hour damages for Maria and Samuel	12/28/2022
	Time-329419	0.5	Update calculation of wage and hour damages, edit draft demand letter	12/28/2022
	Time-329765	1	Draft of PAGA letter	1/3/2023
	Time-329924	1	Draft PAGA letter	1/6/2023
	Time-330033	0.7	Draft PAGA letter	1/10/2023
	Time-330190	0.6	Draft and finalize PAGA letter	1/13/2023
	Time-330275	1	Conduct legal research re PAGA	1/13/2023
	Time-330277	1	Conduct employer research	1/13/2023
	Time-330343	0.3	Draft questions for factual investigation w clients	1/17/2023
	Time-330422	3.5	Conduct legal research re joint liability and 2810.3 liability	1/18/2023
	Time-330523	0.5	Conduct research on employers	1/20/2023
	Time-330524	1	conduct legal research re joint employer liability	1/20/2023
	Time-330527	3	Conduct legal research re LC 2810.3 liability	1/20/2023
	Time-330544	0.5	Conduct employer research	1/23/2023
	Time-330545	0.3	Conduct legal research re ER liability	1/23/2023
	Time-330552	2.3	Conduct legal research re ER liability	1/23/2023

Time-330582	1	Evaluate potential claims and damages for litigation	1/23/2023
Time-331006	1	Call with client, Carmen Mina Suarez, to investigate facts of case	2/1/2023
Time-331007	0.4	Draft retainer and co-counsel agreement	2/1/2023
Time-331042	0.5	Review notes from interviews with workers to collect facts re ERs	2/2/2023
Time-331140	0.3	Review of local rules for Ventura County	2/6/2023
Time-331239	0.2	Review notes from worker interviews	2/7/2023
Time-331240	0.6	Call with client, Candido Lopez Vasquez, re employers.	2/7/2023
Time-331343	0.3	Finalize LAAW litigation retainer and agenda for worker meeting re retainer and litigation process.	2/9/2023
Time-331385	0.8	Call with witness	2/9/2023
Time-331610	1.5	In-person meeting with clients in Oxnard to review and sign retainers and discuss facts.	2/15/2023
Time-331611	3	Travel from Oakland to Oxnard to attend worker meeting and sign retainers.	2/15/2023
Time-331612	3	Travel from Oxnard to Oakland; from meeting with workers to sign retainers	2/16/2023
Time-332227	2	Draft complaint (first sections)	3/2/2023
Time-332265	1	Draft complaint	3/2/2023
Time-332281	2	Draft complaint - joint employer / client employer sections	3/2/2023
Time-332342	2.5	Draft complaint	3/7/2023
Time-332414	0.2	Review notes from worker interviews	3/9/2023
Time-332486	0.3	Review and edit complaint	3/9/2023
Time-332539	1	draft and edit complaint	3/10/2023
Time-332568	0.8	Conduct legal research re PAGA	3/13/2023
Time-332633	2	Draft and edit complaint	3/13/2023
Time-332634	0.3	Call to C. Mina Suarez to discuss facts	3/13/2023
Time-332723	0.5	conduct legal research re PAGA and 98.6	3/15/2023
Time-332725	0.1	Draft and send email to opposing counsel re representation	3/15/2023
Time-333221	2.4	draft and edit complaint	3/24/2023
Time-333532	2	Conduct legal research re elements / jury instructions for each causes of action and theory of liability	3/29/2023
Time-333764	2.2	Draft and edit complaint	4/7/2023
Time-333766	0.3	Conduct employer research	4/7/2023
Time-334190	2	Drafting / making final edits to complaint	4/12/2023
Time-334581	1	Call with client Fidel to gather evidence and document facts	4/14/2023
Time-334654	1	Draft form interrogatories for each defendant	4/18/2023
Time-334954	1.5	Draft RFPs to Driscolls	4/25/2023
Time-334981	2.5	Draft SROGGS, RFAs, RFPs to Driscoll's	4/26/2023
Time-335247	1.5	Review and edit RFA and RFP to STF	5/1/2023
Time-335257	0.4	Conduct legal research re joint employer and client employer liability	5/1/2023
Time-335330	0.4	Review and edit RFPs	5/2/2023
Time-335337	1.8	Draft and edit discovery requests to Seventh Tree Farm	5/2/2023
Time-335458	0.9	Review and edits draft discovery to Patricia Medina	5/4/2023
Time-336097	0.3	Review Driscoll's answer	5/19/2023
Time-336111	1	Draft and edit RFPs to Driscoll's	5/19/2023
Time-336117	1	Draft and edit RFAs and SROGGS to Driscoll's	5/19/2023
Time-336149	0.3	Conduct legal research re RFA responses	5/22/2023
Time-336219	0.3	Draft responses to Driscoll's discovery requests to Plaintiffs, set one	5/23/2023
Time-336259	0.3	Review and edit form ROGS to all Defendants	5/24/2023
Time-336284	1	Review, edit, and finalize RFPs, SROGGS, and RFAs to Patricia Medina	5/24/2023
Time-336293	1.6	Edit and finalize RFAs, RFPs, and SROGGS to Omar Hermocillo, Cindy Balderas and Reyes Balderas	5/24/2023
Time-336347	1.5	Draft Response to Driscoll's FROG-Gen, set one	5/25/2023
Time-336351	0.6	Draft responses to Driscoll's RFAs	5/25/2023
Time-336398	2	Draft RFPs, RFAs, FORM ROGGS responses to Driscoll's	5/26/2023
Time-336432	0.6	Draft response to Driscoll's RFPs to Plaintiffs	5/30/2023
Time-336485	1	Draft response to Driscoll's RFAs	5/30/2023

Time-336489	2.5	Draft responses to Driscoll's FROG, RFAs, RFPs	5/31/2023
Time-336529	0.3	conduct legal research re Labor code 2810.3	6/1/2023
Time-336625	1	Draft and edit responses to RFAs, FROGS, RFPs from Driscoll's.	6/2/2023
Time-336678	0.1	Draft email to Barsamian and Moody re answer and e-service.	6/5/2023
Time-336704	2.2	Gather information from Plaintiffs re responses to Driscoll's discovery.	6/5/2023
Time-336807	2	Draft and edit Plaintiff responses to Driscoll's RFAs and FROGS	6/6/2023
Time-336804	0.4	Draft Response to RFPs from Driscoll's	6/7/2023
Time-336805	1	Draft and edit Plaintiff responses to Driscoll's RFAs and FROGS.	6/7/2023
Time-337046	1.5	Interview with Carmen Mina Suarez re Driscoll's discovery requests.	6/12/2023
Time-337082	1.1	Interview with Maximino to respond to discovery requests from Driscoll's.	6/13/2023
Time-337083	1.2	Interview with Margarita in response to Driscoll's discovery reqs	6/13/2023
Time-337125	0.7	Interview with Alfonso re Driscoll's discovery reqs	6/14/2023
Time-337127	0.6	Draft and review responses to Driscoll's discovery reqs, set one	6/14/2023
Time-337206	0.3	Coordinate scheduling review and verification of responses to Driscoll's discovery for 17 Plaintiffs.	6/16/2023
Time-337287	1	Draft and edit RFA and FROGG responses to Driscoll's	6/20/2023
Time-337291	0.2	Review interview notes for Cecilia and Lorenzo for Driscoll's discovery requests.	6/20/2023
Time-337297	1	Review docs responsive to driscoll's RFPs.	6/20/2023
Time-337435	0.5	Draft RFA and FROGG responses for Cecilia Dolores Martinez	6/22/2023
Time-337438	0.3	Draft RFA and FROGG responses for Alfonso Maldonado	6/22/2023
Time-337444	0.3	Draft RFA and FROG responses for Margarita	6/22/2023
Time-337447	0.3	Draft RFA and FROGS for Lorenzo Romero Rodriguez	6/22/2023
Time-337448	0.3	Draft RFA and FROG responses for Maximino	6/22/2023
Time-337464	0.8	Interview with Candido re responding to Driscoll's Discovery requests	6/22/2023
Time-337473	0.4	Edit and review proposed protective order and send back to Nixon Peabody.	6/23/2023
Time-337488	0.3	Draft RFA and FROG response for Candido	6/23/2023
Time-337626	0.5	Review responses to Driscoll's discovery requests	6/26/2023
Time-337665	2	Meet with some of the plaintiffs to review RFPs, RFAs, FROGGS	6/26/2023
Time-338030	2	Review Driscoll's discovery reqs with Filiberto	7/2/2023
Time-338031	1.1	Interpret responses and facilitating signing of verification for Candido re Driscoll's discovery reqs	7/2/2023
Time-338416	0.6	Conduct final review of RFAs and FROGGS prior to serving.	7/7/2023
Time-339643	0.4	Review STF Response to Ps Form Rogs Emp	8/8/2023
Time-339649	1.1	Review STF Responses to RFAs, SROGGS, Form Rog Gen, RFPs, and production	8/8/2023
Time-339657	0.9	Review Driscoll's Responses to RFAs, FROGGS Emp and Gen; SROGGS.	8/8/2023
Time-339658	1	Review first set of documents produced by Driscoll's	8/8/2023
Time-339668	2	Review document production from Driscoll's	8/8/2023
Time-339672	0.2	Review Driscoll's RFP responses	8/9/2023
Time-339674	0.2	Review Seventh Tree Farm RFP responses	8/9/2023
Time-339751	3	Draft meet and confer letter to STF re STF responses to plaintiffs first set of discovery requests	8/11/2023
Time-339769	0.4	Review STF RFP responses; draft meet and confer letter section re same.	8/14/2023
Time-339770	1.3	Draft meet and confer letter to Driscoll's re its responses to Plaintiff's first set of discovery requests	8/14/2023
Time-339789	2.3	Review documents produced by Driscoll's in response to Plaintiffs RFP	8/14/2023
Time-339791	0.6	Draft meet and confer letter to STF re responses for Plaintiff's first set of discovery requests.	8/14/2023
Time-339812	0.3	Review Driscoll's RFP Responses	8/15/2023
Time-339823	1.5	Draft M&C letter to Driscoll's re discovery responses.	8/15/2023
Time-339865	0.8	Draft, finalize and send meet and confer letters to Seventh Tree Farm and Driscoll's re responses to Plaintiffs first set of discovery requests	8/16/2023
Time-339980	0.4	Review and update discovery plan; develop tag system for discovery review	8/21/2023
Time-340016	0.2	Review Durango RFP responses.	8/22/2023
Time-340071	1	Draft amended complaint with new defendants	8/22/2023
Time-340236	0.7	Draft First amended complaint	8/24/2023
Time-340268	0.4	Draft First amended complaint	8/25/2023
Time-340279	0.8	read and review letter received from STF re meet and confer efforts on Plaintiff's first set of discovery requests; respond to P. Moody re same.	8/25/2023

Time-340286	0.3	Review driscoll's doc production and draft email re deficiencies to opposing council S. Neulight	8/25/2023
Time-340361	0.1	Draft and send email to S. Neulight re additional deficiencies in Driscoll's production.	8/28/2023
Time-340440	1.2	Review and edit meet and confer letter re Durango and four individual defendants deficient responses to discovery requests, set one.	8/29/2023
Time-340480	0.3	Review and edit Second set of Requests for Production to STF and Durango.	8/30/2023
Time-340550	0.2	Draft and edit first amended complaint	8/31/2023
Time-340572	0.9	Conduct legal research re joint employment standard; 2810.3 usual course of business.	9/1/2023
Time-340573	1	Draft and edit FAC	9/1/2023
Time-340577	0.7	Draft email to STF counsel re further discovery response deficiencies (plaintiffs, set one)	9/1/2023
Time-340612	0.2	Review and edit 3rd amended PAGA letter	9/5/2023
Time-340614	1.5	Draft meet and confer communication to STF re discovery responses.	9/5/2023
Time-340692	0.6	Review and edit FAC	9/7/2023
Time-340696	0.3	Review and edit FAC	9/8/2023
Time-340707	0.2	Draft email to opposing counsel re FAC	9/8/2023
Time-340762	0.4	Confer with S. Neulight regarding Driscoll's discovery responses.	9/8/2023
Time-340807	0.2	Review and edit Plaintiffs RFPs to STF and Durango, set two	9/11/2023
Time-340896	0.2	Confer with V. Sprague re finalizing and serving RFPs set 2 to STF and Durango	9/12/2023
Time-340914	0.5	review and edit motion to compel RFPs from Durango, and accompanying declaration	9/12/2023
Time-341072	2	Conduct legal research re Belaire West notices and protective orders in PAGA cases	9/15/2023
Time-341085	0.5	draft revised stipulation to amend complaint and send to opposing counsel	9/16/2023
Time-341083	0.2	Revise stip to amend complaint per email from OC, draft email re same	9/18/2023
Time-341141	0.3	Review and edit RFP to Driscoll's, set two.	9/18/2023
Time-341280	0.5	Review production and amended responses received from Seventh Tree Farm	9/25/2023
Time-341328	0.3	Draft email to Seth Neulight re responses to Plaintiff's RFPs, set one.	9/27/2023
Time-341388	1.3	Review Seventh Tree Farm amended discovery responses.	9/27/2023
Time-341487	0.1	Review draft stip to postpone CMC	10/2/2023
Time-341532	0.3	Confer with A. Toledo re complaint, PAGA claims	10/2/2023
Time-341559	0.5	Meet and confer re discovery with C. Behrman and R. Gonzalez, A. Preciado and G. Warner.	10/3/2023
Time-341672	1.2	Draft and edit RFPs, SROGGs, and RFAs to Duji and RAC	10/4/2023
Time-341816	0.2	Draft email to J. Pereda re meet and confer on discovery	10/6/2023
Time-342208	1	conduct legal research re privacy rights and PAGA	10/17/2023
Time-342227	0.5	Meet and confer call with C. Houlihan, J. Pereda, A. Preciado re STF responses to Plaintiff's discovery requests, set one.	10/18/2023
Time-342293	0.3	Conduct legal research re Belaire West notice process	10/19/2023
Time-342387	0.2	Draft response to J. Pereda re discovery issues, set one and set two of plaintiff's requests	10/23/2023
Time-342633	1	Review and edit discovery requests to Duji Exchange and RAC	10/26/2023
Time-342634	1	Review and edit discovery requests to Duji Exchange and Driscoll's; finalize to serve	10/27/2023
Time-342949	1.2	Review document production from Driscoll's.	11/6/2023
Time-343014	0.7	Draft stipulation re extending CMC timeline based on court order; draft email to all counsel re same.	11/8/2023
Time-343015	0.6	Read and review documents produced by Durango Harvest	11/8/2023
Time-343032	0.5	Review Driscoll's document production	11/8/2023
Time-343148	0.2	Read and review answer filed by RAC and Duji	11/14/2023
Time-343389	1.3	Call with plaintiffs to provide case updates	11/14/2023
Time-343394	4	Review of STF document's produced, supplemental responses to RFPs and SROGs Set One, and Responses to RFPs Set Two.	11/15/2023
Time-343421	2	Review documents produced for Plaintiffs set one and set two responses by STF, track gaps in production	11/17/2023
Time-343453	2.5	Review documents produced by Seventh Tree Farm	11/20/2023
Time-343472	3	Review documents produced by Seventh Tree Farm	11/20/2023
Time-343483	0.2	Call to S. Neulight to discuss discovery timelines; draft email to S. Neulight to confirm extensions.	11/21/2023
Time-343522	1	Draft letter to S. Neulight re Driscoll's document production, set one and two.	11/21/2023
Time-343523	2	Review of documents produced by Seventh Tree Farm	11/21/2023
Time-343533	1.3	Review and analyze documents produced by Seventh Tree Farm and Driscoll's to determine violations.	11/22/2023
Time-343595	2.4	Review and tag documents (email comms) received from Seventh Tree Farm.	11/27/2023
Time-343611	0.3	Draft and send email to S. Neulight following up on documents responsive to Plaintiffs RFPs Set One and Two.	11/27/2023

Time-343614	0.2	Draft email re protective order to A. Toledo and R. Roy	11/27/2023
Time-343646	1.3	Draft meet and confer letter to Seventh Tree Farm re RFPs Sets One and Two	11/27/2023
Time-343714	1	Draft meet and confer letter to STF re responses to Set One and Set Two	11/28/2023
Time-343719	0.2	Review documents produced by Seventh Tree Farm	11/29/2023
Time-343720	0.6	Draft meet and confer letter to STF - section regarding RFPs set two	11/29/2023
Time-343747	1.5	Review of STF document production - compare redacted vs. unredacted versions to verify completeness	11/29/2023
Time-343765	1	Draft and edit meet and confer letter to STF re document production	11/29/2023
Time-343893	1	Draft M&C letter to Seventh Tree Farm re Set One and Set Two responses	11/30/2023
Time-343894	2.2	Review and audit records re boxes harvested	11/30/2023
Time-344305	0.2	draft and send email to Mullen firm re discovery responses, set one and set two.	12/11/2023
Time-344310	0.2	Draft and send email to S. Neulight re Plaintiff's Set One RFP responses.	12/11/2023
Time-344313	0.2	Draft and review list of follow up questions for plaintiffs	12/11/2023
Time-344357	2	Conduct legal research re PAGA damages calculations	12/11/2023
Time-344415	0.2	Review and edit CMC statement and attachment	12/13/2023
Time-344473	0.7	Confer with R. Gonzalez and A. Preciado re Set One Supplemental Discovery Responses and draft & send summary email re call.	12/13/2023
Time-344511	1.2	Conduct legal research re PAGA penalty amounts for different violations	12/14/2023
Time-344512	2	Develop PAGA damages calculation model	12/14/2023
Time-344544	0.1	Draft email to R. Gonzalez re discovery deadlines	12/15/2023
Time-344588	0.5	Conduct legal research re motion to compel deadlines & discovery motions	12/15/2023
Time-344586	0.5	Read and review Driscoll's supplemental responses to Plaintiff's RFPs, Set One	12/15/2023
Time-344593	0.3	Review notes from interviews to collect facts from clients.	12/15/2023
Time-344663	2	Audit of records from Seventh Tree to draft summary of PAGA violations and calculation plan	12/18/2023
Time-344709	2.5	Read and review supplemental discovery responses from Durango Harvest; track necessary follow up	12/19/2023
Time-344736	0.7	Review supplemental discovery responses from Durango Harvest	12/20/2023
Time-344849	3	Review and audit records of boxes produced, boxes missing and crew sheet records.	12/20/2023
Time-344850	0.6	Review Check detail documents from Driscoll's to determine Sundays worked for OT claim	12/20/2023
Time-345063	0.5	Read and review meet and confer letter re discovery from Seventh Tree Farm counsel.	1/2/2024
Time-345141	1	Draft response to STF meet and confer letter re Plaintiff's discovery requests, set one and two	1/2/2024
Time-345158	0.2	Read and review STF responses to Plaintiffs RFPs, Set Two	1/3/2024
Time-345246	2	Review document production from Driscoll's	1/3/2024
Time-345423	2.2	Review documents produced by Driscoll's.	1/3/2024
Time-345504	0.8	Review Set One and Two Responses from Durango Harvest to identify compliance issues.	1/4/2024
Time-345578	0.7	Review discovery from Durango Harvest and draft meet and confer letter	1/5/2024
Time-345684	3	Draft meet and confer letter to Mullen Law re issues with Durango Harvest and Individuals discovery responses, Sets One and Two.	1/8/2024
Time-345749	1.5	Draft response to STF re discovery issues, responses to Set One and Set Two.	1/8/2024
Time-345751	0.1	Draft email response to STF re discovery issues, set one and set two.	1/9/2024
Time-345766	0.3	Read and review first set of discovery responses received from RAC	1/9/2024
Time-345876	0.3	Draft meet and confer letter to Durango Harvest re supp responses to Set one and two	1/10/2024
Time-346011	2.3	Draft deposition outline for Omar Hermocillo.	1/11/2024
Time-346178	1.5	Draft and review meet and confer letter to Driscoll's re RFP responses, Set Two.	1/15/2024
Time-346261	0.3	Finalize and send meet and confer letter to S. Neulight and M. Garcia re Plaintiff's RFPs, Set Two	1/16/2024
Time-346401	2	Draft Omar deposition outline.	1/17/2024
Time-346411	0.4	Draft email to all opposing counsel re mediation and scheduling depositions.	1/18/2024
Time-346427	0.4	Review and edit draft SAC and stipulation to file SAC	1/18/2024
Time-346467	0.3	read and review notes from interviews with workers re box theft	1/18/2024
Time-346548	3	Draft and edit M&C letter to Duji and RAC counsel re deficient responses to all of Plaintiff's First Set of Discovery Requests.	1/19/2024
Time-346575	0.6	Review document production from Durango Harvest	1/22/2024
Time-346584	0.4	Draft correspondance to Mullen Law re failure to supplement discovery responses for individual Defendants and respond to M&C letter re Dur	1/22/2024
Time-346612	0.6	Draft, edit and sent letter to S. Payne re Defendants responses to Plaintiffs first set of discovery requests.	1/22/2024
Time-346990	0.2	conduct final review of second amended complaint	1/29/2024
Time-346992	0.3	Draft and send email to all counsel re mediation; deposition dates, and second amended complaint.	1/29/2024

Time-346993	0.4	Draft email to R. Gonzalez re Defendants discovery responses.	1/29/2024
Time-347024	0.4	Read and review M&C letter from Duji & RAC	1/29/2024
Time-347104	2.3	Draft deposition outline for Omar Hermosillo.	1/30/2024
Time-347171	0.4	Review new documents produced by STF	1/31/2024
Time-347206	1.2	Draft deposition outline for Omar Hermosillo.	2/1/2024
Time-347212	0.2	Review Driscoll's meet and confer letter	2/1/2024
Time-347287	0.2	Draft email to all counsel re deposition dates and mediation dates.	2/1/2024
Time-347288	1	Meet and confer with S. Neulight, M. Garcia, G. Warner, A. Cruz re Driscoll's discovery responses.	2/1/2024
Time-347306	0.3	Draft and edit response to RAC / Duji re discovery responses.	2/1/2024
Time-347307	0.4	Conduct legal research re single enterprise doctrine	2/1/2024
Time-347400	0.3	Draft recap email to S. Neulight summarizing commitments re discovery production and amendments.	2/2/2024
Time-347447	0.3	Read and review Seventh Tree Farm supp responses to plaintiffs RFPs, one and two	2/5/2024
Time-347458	0.5	Draft and edit letter to RAC / Duji counsel re deficiencies in discovery responses.	2/5/2024
Time-347576	0.4	Confer with R. Gonzalez re mediation, depositions, and discovery responses; send follow up email re same.	2/6/2024
Time-347642	0.3	Draft depo notices for Omar and Patricia; coordinate logistics for depositions.	2/7/2024
Time-347773	0.2	Correspond with mediator's office re mediation logistics	2/8/2024
Time-347774	0.1	Draft email to Rafael re deposition scheduling	2/8/2024
Time-347795	2.2	Draft deposition outline for Omar Hermosillo.	2/8/2024
Time-347816	0.7	Review documents received by STF	2/9/2024
Time-347821	1.6	Draft deposition outline for Omar Hermosillo.	2/9/2024
Time-347835	1.3	Draft deposition outline for Omar Hermosillo.	2/9/2024
Time-347880	0.1	Draft email to R. Gonzalez re discovery responses and deposition dates.	2/12/2024
Time-347913	1.2	Draft deposition outline - Omar	2/12/2024
Time-347952	0.8	Draft deposition outline for Omar	2/13/2024
Time-348109	2	Draft deposition outline for Omar	2/13/2024
Time-348340	0.2	conduct legal research re relation back doctrine	2/15/2024
Time-348342	0.1	Draft email to S. Payne re discovery deadlines extension and re calendar deadlines.	2/15/2024
Time-348345	0.1	Draft email to R. Gonzalez re discovery responses and depo dates	2/15/2024
Time-348347	0.2	Conduct legal research re relation back	2/15/2024
Time-348393	0.1	Draft email to counsel re discovery dates.	2/16/2024
Time-348401	0.6	Draft edits to Second Amended Complaint	2/16/2024
Time-348707	2.4	Read and review supplemental responses to RFPs, FORM ROGs, and SROGS from all 4 individual Defendants.	2/22/2024
Time-348889	0.3	Review SAC and draft stipulation; draft and send email to all counsel re revisions to SAC.	2/26/2024
Time-348917	1.2	Draft deposition outline for Omar.	2/26/2024
Time-348994	0.6	Draft deposition outline for Omar	2/27/2024
Time-349063	1.4	Draft meet and confer letter to Mullen re Individual Defendants supplemental RFP responses.	2/28/2024
Time-349085	0.5	Draft meet and confer letter to Mullen re Individual responses to RFPs.	2/28/2024
Time-349107	0.3	Draft depo outline for Omar Hermocillo	2/28/2024
Time-349192	1	Draft Omar Hermocillo depo outline.	2/29/2024
Time-349337	0.4	Draft, finalize, and send letter to Mullen Law re deficiencies with individual defendants supplemental responses to RFPs.	3/1/2024
Time-349360	0.4	Conduct legal research re PAGA	3/1/2024
Time-349657	0.2	Finalize depo notices to Omar and Patricia	3/5/2024
Time-352051	0.7	Confer with R. Gonzalez and S. Stratford Jones re issues with discovery responses from Individual Defendants and Durango Harvest.	3/21/2024
Time-352184	0.2	Confer w S. Payne re discovery from RAC and Duji	3/22/2024
Time-352366	2	Create calculations master spreadsheet for calculating PAGA damages	3/22/2024
Time-352684	5	Calculate PAGA penalties	3/25/2024
Time-353182	0.8	Calculate PAGA penalties	3/27/2024
Time-353516	1	Calculate PAGA penalties	3/28/2024
Time-353618	0.1	Draft email to S. Payne re discovery deadlines	3/28/2024
Time-354626	1	Edit PAGA penalty calculation spreadsheet	4/3/2024
Time-354679	0.3	Conduct legal research re relation back / PAGA	4/3/2024

Time-354697	0.2	Review documents produced by Driscoll's	4/3/2024
Time-354763	0.3	Conduct legal research re relation back doctrine	4/4/2024
Time-354764	0.4	Draft list of informal discovery requests to RAC / Duji.	4/4/2024
Time-355013	0.8	Review Driscoll's supp responses to RFPs set two and draft response re same.	4/5/2024
Time-355021	0.3	conduct legal research on relation back doctrine.	4/5/2024
Time-355042	1	Draft correspondence to M. Garcia and S. Neulight re Driscoll's deficient responses to Plaintiffs RFPs, Set Two	4/5/2024
Time-355050	0.5	Confer with S. Payne, R. Roy, A. Preciado re demurrer.	4/5/2024
Time-355362	0.3	Draft email to S. Payne re discovery requests	4/8/2024
Time-355717	2.5	Draft Omar Hermocillo deposition outline	4/8/2024
Time-355878	0.1	Draft Omar deposition outline	4/9/2024
Time-356227	0.5	Prepare for mediation	4/10/2024
Time-356412	2.2	Draft Omar depo outline and review of documents to be introduced in depo	4/10/2024
Time-356546	1.6	Draft Omar deposition outline	4/11/2024
Time-356747	0.2	Call with M. Garcia re Driscoll's discovery responses plus draft confirmation email of call.	4/11/2024
Time-356748	0.1	Call with S. Payne re demurrer and discovery responses	4/11/2024
Time-357149	0.5	Draft email to S. Payne re stip to delay responsive pleading and informal discovery production categories.	4/15/2024
Time-357507	1.5	Draft Omar deposition outline	4/15/2024
Time-357970	1	Draft Omar deposition and review exhibits for deposition	4/16/2024
Time-357997	0.3	Conduct fact investigation	4/16/2024
Time-358097	0.9	Conduct legal research re 226 penalties	4/16/2024
Time-358098	0.3	Edit PAGA penalty calculations	4/16/2024
Time-358457	0.3	Review and edit stipulation to allow RAC and Duji to delay filing responsive pleading.	4/17/2024
Time-359219	0.1	Respond to email from M. Garcia re extension on Driscoll's discovery responses.	4/19/2024
Time-359287	0.8	Review documents produced by Durango Harvest	4/19/2024
Time-360560	0.7	Calculate PAGA and individual damages	4/22/2024
Time-361114	0.2	Review depo exhibits for Omar Hermocillo	4/23/2024
Time-361717	1.4	Edit Patricia depo outline	4/25/2024
Time-361807	0.1	Read and review Durango and individual defendants answer to complaint	4/26/2024
Time-361811	0.5	Review second supplemental RFP responses from Durango and individual Defendants	4/26/2024
Time-361822	1	draft and edit Patricia Medina depo outline	4/26/2024
Time-361873	0.3	Review production from STF and letter re production to identify missing docs	4/26/2024
Time-361874	0.2	Draft and edit response to J. Pereda re STF discovery production issues.	4/26/2024
Time-362128	0.1	Draft email to S. Stratford-Jones re verifications for discovery responses	4/29/2024
Time-362208	1.4	Draft and edit Omar Depo Outline and update Exhibits	4/29/2024
Time-362521	0.1	Draft email to R. Gonzalez and S. Stratford Jones re depositions	4/30/2024
Time-362636	0.3	Draft and edit Omar depo outline.	4/30/2024
Time-362676	1	Draft and edit Omar Hermocillo depo outline	5/1/2024
Time-362811	0.1	Review new document produced by Driscoll's	5/2/2024
Time-362956	0.8	Review supplemental RFPs, Set Two from Driscoll's and respond to M. Garcia re same.	5/2/2024
Time-363118	1.3	preparation for Omar's deposition	5/3/2024
Time-363353	5	Travel from Oakland to Oxnard for depositions	5/5/2024
Time-363354	1	review deposition outline for Omar's deposition	5/5/2024
Time-363360	7	Taking deposition of Omar Hermocillo	5/6/2024
Time-363362	0.5	Travel to and from deposition of Omar Hermocillo	5/6/2024
Time-363556	5	Serve as second chair for deposition of Patricia Medina	5/7/2024
Time-363559	4	Travel back to Oakland from deposition of Patricia and Omar in Oxnard	5/7/2024
Time-363580	0.1	Review data on box tracking	5/8/2024
Time-363686	0.3	Conduct data analysis re box count	5/8/2024
Time-363711	0.4	Conduct legal research re liability	5/8/2024
Time-363937	0.8	Draft correspondence to R. Gonzalez re documents identified during deposition that should be produced	5/9/2024
Time-364955	0.4	Read and review supplemental discovery responses from Duji and RAC.	5/16/2024

Time-364996	0.3	Review documents produced by Duji / RAC	5/16/2024
Time-365024	0.3	Analyze data from new document production from RAC and Duji	5/16/2024
Time-365042	0.4	Conduct document review in preparation for mediation	5/16/2024
Time-365115	1	Conduct research re PAGA	5/17/2024
Time-365116	0.5	Calculate PAGA damages and number of aggrieved EEs	5/17/2024
Time-365137	0.5	Analyze data re aggrieved employees	5/17/2024
Time-365181	0.5	Draft email to S. Payne re discovery responses and document production	5/17/2024
Time-365513	0.4	Conduct data analysis for PAGA claims	5/20/2024
Time-365557	0.4	Draft email to counsel for STF and Durango re timeline of claims	5/20/2024
Time-366629	1.9	Draft mediation brief	5/28/2024
Time-366751	0.1	Draft mediation brief	5/29/2024
Time-366857	0.3	draft mediation brief	5/29/2024
Time-366963	0.7	Draft mediation brief	5/29/2024
Time-367150	1.3	Draft mediation brief	5/30/2024
Time-367190	0.6	conduct data analysis re box theft	5/30/2024
Time-367299	0.3	Conduct legal research re joint employment	5/31/2024
Time-367344	2.3	Drafting mediation brief - section on 2810.3 liability	5/31/2024
Time-367416	2.6	Draft mediation brief, joint employment section	5/31/2024
Time-367730	0.8	Draft mediation brief	6/4/2024
Time-368023	1	Draft mediation brief - joint employment & 2810.3 sections	6/5/2024
Time-368089	1.7	Calculate PAGA penalties	6/5/2024
Time-368117	0.4	Calculate PAGA and individual damages	6/5/2024
Time-368205	3.1	Draft facts section of mediation brief	6/5/2024
Time-368252	0.4	Review documents produced in discovery	6/6/2024
Time-368974	2.5	Meet with plaintiffs to prepare for mediation	6/9/2024
Time-369244	1	draft mediation brief (intro / facts section)	6/11/2024
Time-370006	1	Draft mediation brief (facts section)	6/12/2024
Time-370186	0.3	Draft mediation brief	6/13/2024
Time-370221	0.5	Draft mediation brief	6/13/2024
Time-370326	0.7	Calculate PAGA penalties	6/13/2024
Time-370338	1	Draft mediation brief	6/13/2024
Time-370684	2.4	Draft mediation brief and prepare exhibit list	6/17/2024
Time-370821	0.1	Call to Maximino re dismissal	6/17/2024
Time-370904	0.4	Draft letter to Maximino re request for dismissal	6/18/2024
Time-370948	1	Draft and edit affirmative relief demands for mediation	6/18/2024
Time-371596	1.4	Calculate Attorney Fees totals for purposes of mediation	6/21/2024
Time-371768	1.5	Review time entries in preparation for mediation	6/24/2024
Time-373085	0.3	Calculate PAGA penalties	6/28/2024
Time-373144	1	Review and analyze documents re box counts in prep for mediation	6/28/2024
Time-373145	0.2	Edit mediation brief	6/28/2024
Time-373146	0.8	Calculate PAGA penalties	6/28/2024
Time-373170	1	Calculate PAGA penalties	6/28/2024
Time-373173	0.4	Prepare exhibits for mediation	6/28/2024
Time-373361	2.4	Draft mediation brief	7/1/2024
Time-373601	2.5	Draft mediation brief	7/1/2024
Time-373704	0.3	Draft mediation brief	7/2/2024
Time-373810	1	Draft affirmative relief requests for mediation	7/2/2024
Time-373977	1.7	Draft mediation brief and finalize exhibits	7/3/2024
Time-374166	0.3	Edit mediation brief	7/5/2024
Time-374182	0.6	Finalize mediation brief, exhibits, and PAGA and individual calcs for mediation	7/5/2024
Time-374626	0.1	draft email to Defendants' counsel re mediation	7/8/2024

Time-374666	0.4	Draft email to H. Sipes re mediation	7/8/2024
Time-376419	4	Travel to Oxnard for Mediation	7/14/2024
Time-376421	8	Attend mediation	7/15/2024
Time-376423	4	Travel home from Mediation in Oxnard	7/16/2024
Time-376534	0.1	Confer with H. Bongiovi re mediation	7/17/2024
Time-377324	0.1	Draft email to mediator	7/22/2024
Time-377331	0.6	Draft email to S. Payne, A. Toledo and R. Roy re Duji / RAC RFP responses.	7/22/2024
Time-377364	0.5	Draft meet and confer letter to S. Stratford and R. Gonzalez re Individual Defendants RFP responses	7/22/2024
Time-377365	1.4	Review Durango harvest and individual Defendants RFP responses to assess compliance, contrasted with evidence from depositions	7/22/2024
Time-377441	0.3	Conduct legal research on joint employment standard	7/22/2024
Time-377443	0.8	Review existing discovery and responses from STF, RAC, and Duji	7/22/2024
Time-378405	0.2	Draft email to S. Payne re RFP responses.	7/24/2024
Time-378422	0.8	Draft SROGs to RAC	7/24/2024
Time-378437	0.2	Draft new SROG to STF	7/24/2024
Time-378457	1.5	Draft new RFPs to STF and review depo transcript for gaps in current production.	7/24/2024
Time-379677	1	Conduct legal research re client employer & joint employer liability	8/1/2024
Time-379755	0.3	Draft email to Barsamian and Moody re production from Seventh Tree Farm	8/1/2024
Time-379927	1.5	Conduct research re RAC & Duji Exchange	8/2/2024
Time-379945	1	Draft SROGs to RAC	8/2/2024
Time-380049	0.2	Draft SROGS to RAC	8/5/2024
Time-380134	0.4	draft and finalize RFPs, Set 3 to STF and SROGs set to STF	8/5/2024
Time-380183	0.2	edit SROGs to RAC	8/5/2024
Time-381232	2.7	draft legal arguments for opposition to Duji's motion to strike PAGA claim	8/8/2024
Time-382225	0.1	Confer with S. Stratford Jones re discovery requests	8/14/2024
Time-382289	0.1	Confer with C. Demera re production of documents and send follow up email	8/15/2024
Time-382472	0.3	review informal discovery produced by RAC	8/16/2024
Time-382473	0.7	Draft RFP to RAC, Set Two	8/16/2024
Time-383502	0.3	conduct fact investigation re RAC	8/22/2024
Time-383508	2.3	Draft opposition to Duji's Motion to Strike	8/22/2024
Time-383535	1.4	Draft opposition to Duji's Motion to Strike	8/22/2024
Time-383623	0.5	Draft opposition to Duji's Motion to Strike	8/22/2024
Time-383697	4.8	Draft opposition to Duji's Motion to Strike	8/23/2024
Time-383771	0.8	Draft opposition to Duji's Motion to Strike	8/23/2024
Time-383996	0.3	Review DH's RFPs to Plaintiffs	8/26/2024
Time-383997	1	Draft opposition to motion to strike	8/26/2024
Time-383998	0.2	draft RFP requests to RAC, set two.	8/26/2024
Time-383999	1	conduct research re RAC and Duji	8/26/2024
Time-384400	0.1	draft email to S. Stratford Jones re DH and individual defendants missing discovery	8/28/2024
Time-384560	2	draft and edit opposition to Duji motion to strike	8/29/2024
Time-384561	0.8	Draft declaration in support of opposition to Duji motion to strike	8/29/2024
Time-385990	0.3	finalize RFPs set two to RAC	9/5/2024
Time-385996	0.3	review documents produced by Duji	9/5/2024
Time-386272	1.3	read and review supp RFP responses from Duji, Set One	9/6/2024
Time-386273	0.7	review documents produced by Duji	9/6/2024
Time-386323	0.1	draft email to C. Houlihan re Plaintiffs RFP and SROGs	9/6/2024
Time-386329	0.2	review final drafts of MPA, proposed Order, and Declaration in opposition to Duji motion to strike.	9/6/2024
Time-386352	2.8	draft meet and confer letter re Duji Responses to plaintiff's RFPs set one	9/6/2024
Time-386844	0.3	read and review RAC responses to Maria Soledad Montoya's SROGs	9/11/2024
Time-386856	0.2	review of new doc production from Durango Harvest	9/11/2024
Time-388313	0.2	read reply brief for Duji motion to strike	9/18/2024
Time-388413	2.3	Prepare for hearing on Duji motion to strike	9/18/2024

Time-388842	0.4	Prepare for hearing on Duji motion to strike	9/23/2024
Time-388899	0.5	review documents produced by RAC	9/23/2024
Time-388900	2	draft meet and confer letter to Duji and RAC re amended responses to Plaintiffs RFPs, set one	9/23/2024
Time-388963	1.8	prepare for hearing on Duji's motion to strike	9/23/2024
Time-388961	1.3	prepare for hearing after reading tentative decision	9/24/2024
Time-388962	0.5	Appear at hearing on Duji's motion to strike	9/24/2024
Time-389005	0.2	draft and send email to C. Demera, P. Moody, and C. Houlihan re STF missing discovery documents	9/24/2024
Time-389221	0.3	review documents produced by RAC	9/25/2024
Time-389426	2	Draft meet and confer letter to RAC re RFP responses	9/26/2024
Time-389479	1.3	Draft meet and confer letter re RAC RFP responses	9/26/2024
Time-389630	4	Review RAC responses and draft M&C letter re RAC RFPs and RAC SROGG responses.	9/27/2024
Time-391033	0.6	Draft third amended complaint	10/7/2024
Time-391089	0.1	draft email to C. Demera re extension on Plaintiff's RFP and SROGG requests	10/7/2024
Time-391106	0.4	Confer with S. Payne re RAC and Duji discovery responses and send email to S. Payne re same.	10/7/2024
Time-391443	0.7	draft joint trial setting conference statement	10/9/2024
Time-391477	0.5	draft Third amended complaint	10/9/2024
Time-391816	3	draft Third Amended Complaint	10/14/2024
Time-392846	1	conduct legal research on joint employment	10/16/2024
Time-393162	1	conduct legal research re alter ego	10/17/2024
Time-393267	0.2	draft and edit trial conference statement	10/18/2024
Time-393761	1.4	Draft Third Amended Complaint	10/23/2024
Time-393828	0.4	conduct final review and edit of TAC before filing	10/23/2024
Time-394016	0.3	review documents produced by Driscoll's	10/24/2024
Time-394980	0.4	review outstanding production issues and draft email to S. Stratford-Jones re same	10/29/2024
Time-395187	2.5	Draft updated proof plan	10/30/2024
Time-395475	0.3	review documents produced by RAC	11/1/2024
Time-395509	0.4	draft correspondence to S. Stratford Jones re missing production from DH and individual defendants.	11/1/2024
Time-395657	0.3	confer with P. Moody re withdrawal; RFP extensions; send email re same.	11/4/2024
Time-395700	0.8	review document production from Driscoll's and RAC	11/4/2024
Time-396118	0.3	review and document RAC production deficiencies	11/7/2024
Time-396165	1.4	Appear for Trial Setting Conference	11/8/2024
Time-396166	0.1	draft email to S. Payne re discovery requests	11/8/2024
Time-396180	1.8	draft and edit Calderon depo outline	11/8/2024
Time-396820	0.3	draft and edit Luis Calderon deposition outline	11/12/2024
Time-397015	1	draft and edit Calderon depo outline	11/13/2024
Time-397083	1.3	review discovery production from STF and RAC to identify gaps	11/13/2024
Time-397200	0.7	Draft and send M&C email to S. Stratford Jones re missing production	11/14/2024
Time-397666	0.5	read and review documents and videos produced by Luis Calderon	11/18/2024
Time-398114	0.3	Confer with R. Roy, S. Payne re filing of demurrer	11/20/2024
Time-398459	0.2	review M&C letter to S. Payne re deficiencies in L. Calderon responses to depo subpoena for docs	11/22/2024
Time-398551	0.5	Call with Rafael	11/22/2024
Time-398828	0.4	review documents produced by DH	11/22/2024
Time-398830	1.5	Analyze PAGA settlement issues	11/22/2024
Time-398995	0.3	draft email to R. Gonzalez re settlement negotiations	11/25/2024
Time-399617	0.5	review RAC and Duji Demurrer	12/2/2024
Time-399618	0.5	review RAC and Duji's supplemental discovery responses and production	12/2/2024
Time-399649	0.2	Confer with S. Payne re deposition and settlement discussions	12/2/2024
Time-399669	0.6	conduct legal research to support drafting of demurrer	12/2/2024
Time-399714	0.2	draft email to P. Moody, C. Demara, C. Houlihan re representation and outstanding discovery requests.	12/3/2024
Time-399798	0.8	Confer with S. Payne re settlement negotiations and deadlines - three phone calls, several emails	12/3/2024
Time-399854	1.5	read and analyze documents from Durango Harvest	12/4/2024

Time-400060	0.1	draft email to P. Moody re withdrawal	12/5/2024
Time-400061	0.2	draft email to S. Payne re moving deadline and demurrer	12/5/2024
Time-400089	0.1	email R. Gonzalez	12/5/2024
Time-400150	0.2	review and sign stipulation to move demurrer; email Sharilyn re same	12/5/2024
Time-400151	1	conduct research re PAGA penalties	12/5/2024
Time-400472	0.1	Call with R. Gonzalez	12/9/2024
Time-400473	0.6	Conduct research re PAGA settlement	12/9/2024
Time-401867	0.3	review intake notes from interview with witness	12/17/2024
Time-402292	0.2	confer with mediator re settlement	12/19/2024
Time-403367	1.7	draft opposition to demurrer	1/3/2025
Time-403381	3	draft opposition to demurrer	1/3/2025
Time-403404	0.7	Draft opposition to demurrer	1/3/2025
Time-403593	2	draft meet and confer letter to RAC & Duji re second amended discovery responses	1/6/2025
Time-403747	0.5	draft meet and confer letter to RAC and Duji re discovery responses	1/7/2025
Time-403876	1	draft M&C letter to Duji and RAC re discovery responses	1/7/2025
Time-403940	0.1	draft email to R. Gonzalez	1/8/2025
Time-404017	2.7	draft opposition to demurrer	1/8/2025
Time-404606	0.2	draft and edit meet and confer letter to RAC re RFP responses.	1/15/2025
Time-404615	0.1	edit declaration to opposition to demurrer from RAC	1/15/2025
Time-404934	0.8	draft opposition to demurrer	1/16/2025
Time-404965	0.5	draft meet and confer letter to RAC and Duji re deficient discovery responses	1/16/2025
Time-405196	0.4	draft correspondence to S. Payne, A. Toledo, and R. Roy re discovery responses from RAC, request to meet and confer	1/17/2025
Time-405199	0.1	draft email to S. Payne, R. Roy, and A. Toledo	1/17/2025
Time-405786	0.2	Confer with mediator	1/21/2025
Time-406386	0.2	Confer with mediator	1/23/2025
Time-406440	2	draft and edit opposition to Duji and RAC's demurrer	1/23/2025
Time-406546	1	draft opposition to demurrer	1/24/2025
Time-406659	1.5	draft opposition to demurrer and supporting declaration	1/27/2025
Time-406737	1.5	conduct legal research in support of opposition for demurrer	1/27/2025
Time-406738	2.2	draft opposition to demurrer	1/27/2025
Time-407023	0.3	Call with mediator	1/29/2025
Time-407177	1	Draft and edit opposition to Duji / RAC demurrer	1/30/2025
Time-407184	0.2	Call with S. Payne re settlement and litigation deadlines	1/30/2025
Time-407194	0.1	draft email to S. Payne re deadlines & settlement	1/30/2025
Time-408239	0.3	call with A. Toledo and S. Payne re settlement	2/5/2025
Time-408838	1	Draft affirmative relief for STF & Durango	2/11/2025
Time-408947	0.7	draft affirmative relief provisions for STF / Durango and email to H. Bongiovi re same	2/12/2025
Time-409691	0.2	review proposed affirmative relief from S. Payne	2/18/2025
Time-410240	0.2	draft email to S. Payne re deadlines and settlement	2/19/2025
Time-410435	0.5	review affirmative relief for settlement agreement from STF / Durango	2/20/2025
Time-410583	0.7	draft edits to affirmative relief and notice for STF/ DH for potential settlement	2/21/2025
Time-410980	0.2	Confer with H. Bongiovi re settlement	2/24/2025
Time-410978	0.2	draft email to H. Bongiovi re affirmative relief	2/25/2025
Time-410988	0.1	call with H. Bongiovi re settlement	2/25/2025
Time-411053	0.7	Engage in settlement negotiations	2/26/2025
Time-411074	0.1	draft email to S. Payne re stipulation	2/26/2025
Time-411081	1.3	calculating damage allocations	2/26/2025
Time-411091	0.3	review final drafts of opposition to demurrer and declaration in support	2/26/2025
Time-411368	0.7	Calls to Plaintiffs to discuss proposed settlement	2/28/2025
Time-411374	0.3	Calls to Plaintiffs to discuss proposed settlement	2/28/2025
Time-411408	0.5	Call 2 of the Plaintiffs to discuss mediator proposal	3/2/2025

		Time-412647	0.1	call with H. Bongiovi	3/7/2025
		Time-413338	0.2	draft email to R. Gonzalez re data from defendants for settlement	3/14/2025
		Time-413339	1.5	calculating amounts for settlement; reaching out to settlement administrators	3/14/2025
		Time-414484	0.4	review settlement administration quotes	3/20/2025
		Time-414485	1	calculate settlement amounts	3/20/2025
		Time-414562	0.5	calculate settlement payments and email R. Gonzalez re same	3/20/2025
		Time-414567	0.2	draft emails to C. Behrman re settlement	3/20/2025
		Time-414573	0.3	draft email to opposing counsel re settlement administration	3/20/2025
		Time-414817	0.2	draft email to R. Gonzalez re settlement administration	3/24/2025
		Time-415347	2.5	draft declaration in support of PAGA settlement approval motion	3/27/2025
		Time-415498	0.5	draft motion for settlement approval	3/28/2025
		Time-416354	0.4	confer with R. Gonzalez re settlement administration	4/2/2025
		Time-417062	1.3	draft PAGA settlement notice	4/8/2025
		Time-417134	0.5	draft motion for PAGA settlement approval	4/8/2025
	Subtotal	Sum	537.6		
	Total Hours All Attorneys	Count	1140.5		

Exhibit 3

CASE EXPENSE LOG			
MINA SUAREZ, ET AL. v. SEVENTH TREE FARMS, INC., ET AL.			
Date	Vendor/Court	Description	Amount
4/20/2023	USPS	Service of Summons and Complaint via Notice of Acknowledgment and Receipt (Driscolls)	\$ 9.65
4/20/2023	USPS	Service of Summons and Complaint via Notice of Acknowledgment and Receipt (Seventh Tree and Indiv.)	\$ 9.65
4/23/2023	One Legal	OneLegal CCSALE04928268 - Filing Complaint	\$ 576.52
4/30/2023	Western Attorney Services	Service of Process fees for Durango Harvest service	\$ 319.00
5/21/2023	Western Attorney Services	Service of Process fees for R. Balderas service	\$ 252.75
5/25/2023	One Legal	OneLegal CCSALE05018894 - filing Notice of Acknowledgment and Receipt	\$ 92.66
6/15/2023	Amtrak Train	K. Ouillette Amtrak RT Burbank - Oxnard Seventh Tree Farm - Meeting with Workers re Discovery	\$ 38.60
9/29/2023	Ventura Public Access	VENTURA COURT EFILE - Filing Stipulation for leave to file Amended Complaint	\$ 21.75
9/29/2023	Ventura Public Access	VENTURA COURT EFILE - Filing Stipulation for leave to file Amended Complaint	\$ 0.60
9/29/2023	Ventura Public Access	VENTURA COURT EFILE - Filing Stipulation for leave to file Amended Complaint	\$ 4.95
10/6/2023	Ventura Public Access	VENTURA COURT EFILE - E-submission of First Amended Complaint on Court's website	\$ 4.95
10/6/2023	Ventura Public Access	VENTURA COURT EFILE - E-submission of First Amended Complaint on Court's website	\$ 0.05
10/6/2023	Ventura Public Access	VENTURA COURT EFILE - E-submission of First Amended Complaint on Court's website	\$ 1.75
10/8/2023	Commercial Process Serving	COMMERCIAL PROCESS SERVIN - Service of Process on Duji Exchange and Reiter Affiliated Services (Amended Complaint)	\$ 246.70
10/22/2023	Ventura Public Access	VENTURA COURT EFILE - E-submission POS re Order to Continue CMC - \$4.95	\$ 4.95
10/22/2023	Ventura Public Access	VENTURA COURT EFILE - E-submission POS re Order to Continue CMC - \$0.05	\$ 0.05
10/22/2023	Ventura Public Access	VENTURA COURT EFILE - E-submission POS re Order to Continue CMC - \$1.75	\$ 1.75
11/16/2023	Ventura Public Access	VENTURA COURT EFILE - Filing Stipulation to Continue CMC	\$ 4.95
11/16/2023	Ventura Public Access	VENTURA COURT EFILE - Filing Stipulation to Continue CMC	\$ 0.60
11/16/2023	Ventura Public Access	VENTURA COURT EFILE - Filing Stipulation to Continue CMC	\$ 21.75
12/20/2023	Ventura Public Access	VENTURA COURT EFILE - Payment of Advanced Jury Fee	\$ 151.75
12/20/2023	Ventura Public Access	VENTURA COURT EFILE - Filing fee for Notice of Posting of Advanced Jury Fees	\$ 4.95
12/20/2023	Ventura Public Access	VENTURA COURT EFILE - Processing fee for filing Notice of Posting of Advanced Jury Fees	\$ 4.17
1/25/2024	Ventura Public Access	VENTURA COURT EFILE - Filing CMC Statement	\$ 4.95
1/25/2024	Ventura Public Access	VENTURA COURT EFILE - Filing CMC Statement	\$ 1.75
1/25/2024	Ventura Public Access	VENTURA COURT EFILE - Filing CMC Statement	\$ 0.05
1/28/2024	Court Call	COURTCALL *11788697 - Court call for A. Campbell appearance at CMC	\$ 72.00
2/7/2024	Ventura Public Access	VENTURA COURT EFILE - Filing fees for Notice of Remote Appearance of A. Campbell	\$ 4.95
2/7/2024	Ventura Public Access	VENTURA COURT EFILE - Filing fees for Notice of Remote Appearance of A. Campbell	\$ 0.05
2/7/2024	Ventura Public Access	VENTURA COURT EFILE - Filing fees for Notice of Remote Appearance of A. Campbell	\$ 1.75
3/17/2024	Ventura Public Access	VENTURA COURT EFILE - E-filing Stipulation to file Second Amended Complaint	\$ 21.75
3/17/2024	Ventura Public Access	VENTURA COURT EFILE - E-filing Stipulation to file Second Amended Complaint	\$ 0.60
3/17/2024	Ventura Public Access	VENTURA COURT EFILE - E-filing Stipulation to file Second Amended Complaint	\$ 4.95
3/21/2024	Ventura Public Access	VENTURA COURT EFILE - E-filing Second Amended Complaint	\$ 1.75
3/21/2024	Ventura Public Access	VENTURA COURT EFILE - E-filing Second Amended Complaint	\$ 0.05
3/21/2024	Ventura Public Access	VENTURA COURT EFILE - E-filing Second Amended Complaint	\$ 4.95
4/8/2024	United Airlines	A. Campbell Flight to Santa Barbara for depositions	\$ 159.10
4/8/2024	United Airlines	A. Campbell Flight returning to SFO for depositions	\$ 129.10
4/8/2024	United Airlines	K. Ouillette Reservation United Airlines Flight from SF to SB for depositions	\$ 159.10
4/8/2024	United Airlines	K. Ouillette Reservation United Airlines Flight from SB to SF for depositions	\$ 129.10
4/15/2024	Airbnb	Airbnb Lodging reservation for for A. Cruz, A. Campbell, and K. Ouillette for depositions	\$ 860.45
5/5/2024	Mileage reimbursement	A. Cruz Travel from Santa Maria to Santa Barbara Airport for depositions (62.4 miles)	\$ 41.81
5/5/2024	Mileage reimbursement	A. Cruz Travel from Santa Barbara Airport to Airbnb in Oxnard for depositions (62.4 miles)	\$ 33.23
5/5/2024	Lyft Rideshare	A. Campbell Rideshare Travel for depositions	\$ 51.00
5/6/2024	Mileage reimbursement	A. Cruz Travel from Airbnb to CRLA Oxnard office for deposition roundtrip (12.4 miles)	\$ 8.31
5/7/2024	Mileage reimbursement	A. Cruz Travel from Airbnb to CRLA office for deposition (6.2 miles)	\$ 4.15
5/7/2024	Mileage reimbursement	A. Cruz Travel from CRLA office to Santa Barbara Airport to drop off Kim and Alex after depositions (47.4 miles)	\$ 31.76
5/7/2024	Mileage reimbursement	A. Cruz Travel from Santa Barbara Airport to Santa Maria after depositions (62.8 miles)	\$ 42.08
5/7/2024	Lyft Rideshare	A. Campbell Rideshare Travel for depositions	\$ 48.74
5/28/2024	Southwest Airlines	K. Ouillette Reservation Southwest Airlines RT flight to Burbank for mediation prep	\$ 313.96
6/3/2024	First Legal Deposition Services	Court Reporting/Transcript fee for Deposition of P. Medina on May 7, 2024	\$ 2,662.40
6/3/2024	First Legal Deposition Services	Videographer services for Deposition of P. Medina on May 7, 2024	\$ 1,615.00
6/3/2024	First Legal Deposition Services	Court Reporting/Transcript fee for Deposition of O. Hermocillo on May 6, 2024	\$ 4,187.75
6/3/2024	First Legal Deposition Services	Videographer services for Deposition of O. Hermocillo on May 6, 2024	\$ 2,335.00
6/9/2024	Mileage reimbursement	A. Cruz Travel from Jurupa Valley to Burbank Airport to pick up K. Ouillette for client meeting to prep for mediation (58.3 miles)	\$ 39.06
6/9/2024	Mileage reimbursement	A. Cruz Travel from Burbank Airport to meeting with Plaintiffs in Oxnard in preparation of mediation in July (58.9 miles)	\$ 39.46
6/9/2024	Mileage reimbursement	A. Cruz Travel from CRLA office in Oxnard to home in Santa Maria after meeting with Plaintiffs in Oxnard in preparation of mediation in July (107 miles)	\$ 71.69
6/9/2024	Mileage reimbursement	K. Ouillette Mileage RT home to Oakland airport Travel for mediation prep	\$ 15.41
6/9/2024	Amtrak Train	K. Ouillette Amtrak Oxnard to Glendale - travel after mediation prep	\$ 21.00
6/12/2024	Airbnb	Reservation Airbnb lodging for K. Ouillette and A. Cruz for mediation, 2 nights	\$ 454.19
6/13/2024	Bongiovi Mediation	Payment of Mediator's Fees	\$ 7,000.00
6/18/2024	USPS	USPS.COM CLICKNSHIP - Send Closing letter to M. Gonzalez Matias (Plaintiff) requesting to withdraw from litigation	\$ 8.50
7/3/2024	United Airlines	K. Ouillette Reservation United Airlines travel to Oxnard for mediation	\$ 448.47
7/10/2024	Ventura Public Access	VENTURA COURT EFILE - E-filing fees and costs - Request for Dismissal of Plaintiff M. Gonzalez Matias	\$ 1.75
7/10/2024	Ventura Public Access	VENTURA COURT EFILE - E-filing fees and costs - Request for Dismissal of Plaintiff M. Gonzalez Matias	\$ 0.05
7/10/2024	Ventura Public Access	VENTURA COURT EFILE - E-filing fees and costs - Request for Dismissal of Plaintiff M. Gonzalez Matias	\$ 4.95
7/15/2024	Mileage reimbursement	A. Cruz Travel from Santa Maria, CA to Santa Barbara Airport to pick up K. Ouillette for mediation in Oxnard (62.3 miles)	\$ 41.74
7/15/2024	Mileage reimbursement	A. Cruz Travel from Airbnb in Oxnard to CRLA's office for mediation (3.3 miles)	\$ 2.21
7/16/2024	Mileage reimbursement	A. Cruz Travel from Airbnb to drop off K. Ouillette at Santa Barbara Airport after mediation (47.7 miles)	\$ 31.96
9/8/2024	Court Call	COURTCALL *11858843 - Remote Court Appearance for Motion to Strike hearing	\$ 72.00
9/12/2024	Commercial Process Serving	COMMERCIAL PROCESS SERVIN - Courier fee for filing Opposition to Motion to Strike/delivery of courtesy copies	\$ 112.50
9/22/2024	Ventura Public Access	VENTURA COURT EFILE - Filing and processing fees for Notice of Remote Appearance	\$ 4.95
9/22/2024	Ventura Public Access	VENTURA COURT EFILE - Filing and processing fees for Notice of Remote Appearance	\$ 0.05
9/22/2024	Ventura Public Access	VENTURA COURT EFILE - Filing and processing fees for Notice of Remote Appearance	\$ 1.75
10/14/2024	Ventura Public Access	VENTURA COURT EFILE - Filing Fee Notice of Appearance of A. Cruz	\$ 0.05
10/14/2024	Ventura Public Access	VENTURA COURT EFILE - Filing Fee Notice of Appearance of A. Cruz	\$ 4.95
10/14/2024	Ventura Public Access	VENTURA COURT EFILE - Filing Fee Notice of Appearance of A. Cruz	\$ 1.75
10/18/2024	United Airlines	S. Aber Reservation United Airlines Flights to and from Burbank for deposition	\$ 196.95
10/25/2024	Ventura Public Access	VENTURA COURT EFILE - Filing fee and processing for Third Amended Complaint	\$ 0.05
10/25/2024	Ventura Public Access	VENTURA COURT EFILE - Filing fee and processing for Third Amended Complaint	\$ 4.95

10/25/2024	Ventura Public Access	VENTURA COURT EFILE - Filing fee and processing for Third Amended Complaint	\$ 1.75
10/29/2024	Ventura Public Access	VENTURA COURT EFILE - E-file Trial Status Conference Statement	\$ 4.95
10/29/2024	Ventura Public Access	VENTURA COURT EFILE - E-file Trial Status Conference Statement	\$ 0.05
10/29/2024	Ventura Public Access	VENTURA COURT EFILE - E-file Trial Status Conference Statement	\$ 1.75
10/29/2024	Ventura Public Access	VENTURA COURT EFILE - E-File Notice of Appearance S. Aber	\$ 4.95
10/29/2024	Ventura Public Access	VENTURA COURT EFILE - E-File Notice of Appearance S. Aber	\$ 1.75
10/29/2024	Ventura Public Access	VENTURA COURT EFILE - E-File Notice of Appearance S. Aber	\$ 0.05
11/6/2024	Ventura Public Access	VENTURA COURT EFILE - E-file Notice of Remote appearance for K. Ouillette and A. Campbell	\$ 0.05
11/6/2024	Ventura Public Access	VENTURA COURT EFILE - E-file Notice of Remote appearance for K. Ouillette and A. Campbell	\$ 1.75
11/6/2024	Ventura Public Access	VENTURA COURT EFILE - E-file Notice of Remote appearance for K. Ouillette and A. Campbell	\$ 4.95
11/6/2024	Court Call	COURTCALL *11875818 -Courtcall charge for K. Ouillette appearance at Trial Status Conference	\$ 72.00
11/6/2024	Commercial Process Serving	COMMERCIAL PROCESS SERVIN - Serve subpoena for deposition of B. Orozco	\$ 250.00
11/12/2024	Mileage reimbursement	A. Cruz Travel from Santa Maria to Santa Barbara to defend plaintiff A. Maldonado Santiago in deposition (69.5 miles)	\$ 46.57
11/12/2024	Mileage reimbursement	A. Cruz Travel from Santa Barbara to Santa Maria after defending plaintiff A. Maldonado Sanitago in deposition in Santa Barbara (69.7 miles)	\$ 46.70
11/17/2024	Uber Rideshare	G. Warner Travel to deposition in Oxnard, CA; uber to OAK	\$ 39.70
11/17/2024	Southwest Airlines	G. Warner Southwest Travel to deposition in Oxnard, CA; flight to LA	\$ 129.99
11/17/2024	Dollar Car Rental	G. Warner Travel to deposition in Oxnard, CA; rental car	\$ 134.55
11/17/2024	Courtyard Marriott	G. Warner Courtyard by Marriott Travel to deposition in Oxnard, CA; hotel	\$ 189.56
11/17/2024	Lyft Rideshare	S. Aber Lyft Car from home to SFO for flight to Burbank for deposition	\$ 58.45
11/17/2024	Metrolink Train	S. Aber Metrolink Train from Burbank to Oxnard for deposition	\$ 12.75
11/17/2024	Courtyard Marriott	S. Aber Courtyard Marriott Hotel stay in Oxnard for L. Calderon deposition	\$ 189.56
11/18/2024	Southwest Airlines	G. Warner Southwest Air Travel from deposition in Oxnard, CA	\$ 103.98
11/18/2024	Amtrak Train	S. Aber AmtrakTrain from Oxnard to Burbank, returning from deposition	\$ 19.00
12/18/2024	First Legal Deposition Services	Videographer services of Deposition of L. Calderon on November 18, 2024	\$ 2,400.00
12/18/2024	First Legal Deposition Services	Court reporting/transcript fee for Deposition of L. Calderon on November 18, 2024	\$ 3,476.80
1/14/2025	USPS	Service of Amended Deposition Notice for B. Orozco on unrepresented party Seventh Tree Farms, Inc.	\$ 9.00
2/26/2025	USPS	Service of Plaintiffs' Opposition to Demurrer on unrepresented party Seventh Tree Farms, Inc.	\$ 8.40
2/27/2025	One Legal	OneLegal Filing Plaintiffs' Opposition to Demurrer	\$ 22.92
TOTAL:			\$ 30,518.41