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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

AHMONE BRYANT and SUSAN RODGERS, individually and on behalf of all others similarly situated, Plaintiffs, v. BRINKER RESTAURANT CORPORTATION; BRINKER INTERNATIONAL, INC. and BRINKER INTERNATIONAL PAYROLL COMPANY, L.P., inclusive, Defendants.	Case No: CGC-23-608589 (lead case) Consolidated with Case No.: CGC-21-597124 **DECLARATION OF ROBERT OTTINGER IN SUPPORT OF PLAINTIFF SALDANA AND PLAINTIFF BRYANT'S MOTION FOR APPROVAL OF THE PAGA SETTLEMENT** Date: ----, 2026 Time: 11:00 a.m. Location: Room 613 Judge: Jeffrey S. Ross

Lawyaw Package ID: ca7e62cb-8ec3-4f99-afc0-5c4f32e5fad0

DECLARATION OF ROBERT OTTINGER

I, ROBERT OTTINGER, declare as follows:

1. I am an attorney in good standing duly admitted to the State Bar of California and attorney of record for Plaintiffs Ahmone Bryant and Veronica Saldana ("Plaintiffs") in this action against Defendants Brinker Restaurant Corporation, Brinker International, Inc., and Brinker International Payroll Company, L.P. (hereafter, "Defendants").

2. Except for those matters stated on information and belief, of which I am informed and believe are true and correct, I have personal knowledge of all matters set forth herein. If called as a witness, I could and would competently testify thereto.

I. My Experience and My Firm's Experience

3. My firm, The Ottinger Firm, P.C., is an employment law firm with offices in New York and San Francisco. We have been focusing on employment law since 1999 and have represented thousands of people over the years in various employment matters, including wage & hour class actions and cases pursuant to the Private Attorneys General Act ("PAGA").

4. I graduated from Loyola Law School and received my Juris Doctor in June 1991. I received a B.A. degree from East Stroudsburg University in 1986. I have over 20 years of legal practice experience since graduating from law school in 1991. I was admitted to practice in California in December 1991, and in New York in 1996. I began my career by clerking for Judge Robert M. Mallano of the California Superior Court in Los Angeles, California from December 1991 to 1993 and, from 1993 to 1995, working as a Deputy Attorney General for the California Department of Justice where I handled criminal appeals and trials. From 1995 to 1997, I worked as an Assistant Attorney General at the New York State Attorney General's Office where I handled employment and civil rights matters in federal court, including serving as lead trial counsel in over twelve federal jury trials involving civil rights and employment discrimination matters. I worked from 1997 through 1999 as an associate at the firm of Dienst & Serrins where I managed the firm's employment practice, represented plaintiffs in a wide range of employment matters, and served as lead trial counsel in 3 federal jury trials. Accordingly, The Ottinger Firm requests a rate of $850.00 per hour for my work on this case.

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5. I started the Ottinger Firm in 1999. At the Ottinger Firm, I served as lead counsel in over two hundred employment cases involving a wide range of legal claims, a role in which I continue to engage. I have handled Fair Labor Standards Act cases since 2008. The Ottinger Firm, in addition to this case, has handled numerous class actions involving wage and hour claims and PAGA cases. The Ottinger Firm has represented or continues to represent Plaintiffs in, among others, the following class and/or representative actions:

a. *Spencer v. Bargain Land*, 10-CV-957 (E.D.N.Y)
b. *Mas v. Cumulus Media Inc.*, 10-CV-01396 (N.D. Cal)
c. *Fouathia v. Gurwitch Products*, 10-CV-6411(S.D.N.Y)
d. *Me Gomez v. Bloomberg Technology, Inc.*, 10-CV-6412 (S.D.N.Y)
e. *Bardouille v. Goldman Sachs & Co.*, 10-CV-6412 (S.D.N.Y.)
f. *Ellis v. Ben's Asphalt, et al.*, 30-2009-00329394 (Cal. Orange Co. Sup. Court)
g. *Parnell v. Kroll On Track, Inc.*, 11-CV-0473 (S.D.N.Y)
h. *Landin v. UBS*, 10-CV-711 (S.D.N.Y)
i. *Mas v. Cumulus Media Partners*, 10-CV-1396 (N.D. Cal.)
j. *Martinez v. Forest Laboratories*, 10-CV-06032 (S.D.N.Y)
k. *Orgill v. Ingersoll-Rand Company*, 101142-2010 (S.D.N.Y)
l. *Staley v. Lifetouch, Inc.*, 10-CV-3464 (N.D. Cal)
m. *Dorn v. Eddington Security, Inc.*, 08-CV-10271 (S.D.N.Y)
n. *Olivia v. Executive Cellular Phones, Inc.*, 11-CV-3994 (S.D.N.Y)
o. *Vosilla v. Novo Nordisk, Inc.*, 11-CV-3744 (E.D.N.Y)
p. *Chisholm v. Sanofi-Aventis U.S. LLC*, 11-CV-7758 (S.D.N.Y)
q. *McKenzie v. Schulte Roth & Zabel, LLP*, 11-CV-3991 (S.D.N.Y)
r. *Cruz v. Shiseido Americas, Inc.*, 11-CV-6622 (S.D.N.Y)
s. *Doyle v. MapMyFitness*, 11-CV-05879 (D.N.J)
t. *Butt v. Megabus Northeast, LLC*, 11-CV-3993 (S.D.N.Y)
u. *Gomez v. Gravitas Technology, Inc.*, 10-CV-6412 (S.D.N.Y)
v. *Szu v. TGI Friday's, Inc.*, 12-CV-2707 (E.D.N.Y)

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w. *Keller v. Axa Equitable Life Insurance Company*, 12-CV-4565 (S.D.N.Y)

x. *Lebron v. Apple-Metro, Inc.*, 12-CV-1870 (S.D.N.Y)

y. *Dalton v. Gem Financial Services, Inc.*, 15-CV-05636 (E.D.N.Y)

z. *Earhart et al. v. Squaw Valley Resort, LLC, et al.*, 21vcm49 (Mono Co. Sup. Ct.)

aa. *Sanchez, et al. v. Hearst Communications, Inc.*, 20-cv-5147 (N.D. Ca.)

bb. *James, et al. v. J.J. Keller & Associates Inc.*, 21STCV10996 (Los Angeles Co. Sup. Ct.)

cc. *Salazar v. Kael Foods*, CGC-21-588813 (San Francisco Co. Sup. Ct.)

6. Among these cases, The Ottinger Firm has been appointed as class counsel in *Barouille v. Goldman Sachs & Co.*, 10-CV-4285, (S.D.N.Y); *Mas v. Cumulus Media Partners*, 10-CV-1396 (N.D. Cal); *Landin v. UBS*, 10-CV-711, (S.D.N.Y); *Martinez v. Forest Laboratories*, 10-CV-06032, (S.D.N.Y); *Orgill v. Ingersoll-Rand Company*, 101142/2010, (S.D.N.Y); *Butt v. Megabus Northeast, LLC*, 11-CV-3993, (S.D.N.Y); *Gomez v. Gravitas Technology, Inc.*, 10-CV-6412, (S.D.N.Y); *Fouathia v. Gurwitch Products*, 10-CV-6411, (S.D.N.Y); *McKenzie v. Schulte Roth & Zabel, LLP*, 11-CV-3991, (S.D.N.Y); *Dorn v. Eddington Security*, 08-CV-10271, (S.D.N.Y), (co-counsel with Outten & Golden LLP); *Sanchez, et al. v. Hearst Communications, Inc.*, 20-cv-5147 (N.D. Ca.), (co-counsel with Outten & Golden LLP), *Salazar v. Kael Foods*, CGC-21-588813 (San Francisco Co. Sup. Ct.), *James, et al. v. J.J. Keller & Associates Inc.*, 21STCV10996 (Los Angeles Co. Sup. Ct.), and *Lebron v. Apple-Metro, Inc.*, 12-CV-1411, (S.D.N.Y).

II. Procedural Background

7. Defendants own and operate a national chain of casual dining restaurants across the United States and operates approximately 105 separate restaurants in California under the name Chili's Grill & Bar ("Chili's"). Plaintiffs were employed by Defendant as non-exempt employees in California during the PAGA Period. Plaintiff Saldana was employed by Defendants as a Server at the Manteca Chili's restaurant, located at 2262 Daniels Street, Manteca, CA 95337, from approximately April 24, 2017, to November 25, 2020. Plaintiff Bryant was employed by Defendants as a Server at the Carson Chili's restaurant located at 20760 Avalon Blvd., Carson, CA 90746, from approximately January 30, 2023, to May of 2023._Plaintiff Rodgers was employed by Defendants as a To Go

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Specialist from approximately July 2022 to January 2023 at the Concord Chili's restaurant located at 1501 Concord Ave., Concord, CA 94520.

8. On November 9, 2021 Plaintiff Saldana filed an initial PAGA notice with the Labor Workforce Development Agency alleging labor code violations by Defendants including failure to provide meal and rest periods, and failure to pay required premiums for being forced to work through those breaks.

9. On December 14, 2021, Plaintiff Saldana filed *Veronica Saldana v. Brinker Restaurant Corporation et al*., Case No. CGC-21-597124 ("*Saldana*") a class action alleging Labor Code violations, and on December 29, 2025, filed a First Amended Complaint claiming penalties pursuant to the PAGA and removing the class claims against Defendants.

10. In or around May 2023, The Ottinger Firm, P.C. learned of another firm, King & Siegel LLP, intending to bring substantially similar claims against Defendants. The firms agreed to work as co-counsel and to include King & Siegel's client, Susan Rodgers, as a named Plaintiff.

11. On June 26, 2023, Defendants moved to compel Plaintiff Saldana's individual PAGA claim to arbitration and to dismiss or stay the Saldana action. Plaintiffs filed their opposition on July 21, 2023. On or about August 10, 2023, the Court granted the motion as to Plaintiff Saldana's individual PAGA claim and stayed the Saldana action.

12. On September 14, 2023, our firm filed a Demand for Arbitration and Statement of Claims with the American Arbitration Association on Plaintiff Saldana's behalf. A scheduling order issued in December 2023 and an arbitration hearing was set for December 9 through 13, 2024. The parties reached the settlement described below at mediation on November 7, 2024, before that hearing took place.

13. The instant action was filed by Plaintiffs Bryant and Saldana on August 23, 2023, for claims pursuant to PAGA after Defendants refused to consent to a Second Amended Complaint in Saldana to add additional Plaintiffs.

14. On November 2, 2023, Defendants filed their Answer to the Complaint in *Bryant* citing numerous affirmative defenses including no willful violations, voluntary refusal of meal periods and rest breaks, and manageability of the case to be heard as a PAGA representative matter.

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15. Defendants also moved to compel Plaintiff Bryant's and Plaintiff Rodgers' claims in this action to arbitration and to stay the remaining claims. On March 6, 2024, the Court granted the motion as to Plaintiff Bryant's individual PAGA claim only, denied the motion as to Plaintiff Rodgers and as to Plaintiff Bryant's non-individual PAGA claim, and denied Defendants' request for a stay. The arbitration proceedings on Plaintiff Bryant's individual claim were stayed pending this settlement, and the non-individual PAGA claims proceeded in this Court.

16. During the pendency of both *Saldana* and *Bryant* another class action and PAGA representative case was pending against Defendants, *Hale, Gomez v. Brinker International Inc. et al.* Case No. 3:21-cv-09978-VC ("*Hale*"). The *Hale* matter was filed on November 18, 2021, as a PAGA representative and class action against Defendants in Los Angeles Couty Superior Court Case No. 21CV002855, premised on the same underlying Labor Code Violations as the *Bryant* and *Saldana* matters. *Hale* was subsequently removed to the Northern District of California. The Plaintiffs in *Hale* filed a Motion for Class Certification on September 26, 2024. On February 6, 2025, the Motion for Class Certification in *Hale* was denied.

17. On November 7, 2024, the Plaintiffs in both *Saldana* and *Bryant* engaged in mediation with the assistance of mediator Dave Carothers to seek a resolution for both matters. A resolution was reached that day, with a total settlement amount of $1,675,000.00. Defendants produced substantial documentation to allow Plaintiffs' counsel to calculate potential damages, and then after a settlement in principle was reached, to confirm the appropriateness of the settlement prior to execution of the MOU. These documents included: time punch and payroll records for all allegedly aggrieved employees, Defendant's policy and procedure documents including explanatory materials of timekeeping tools, skip reports and documents previously produced in *Hale*. The post-settlement supplemental documents included time punches, payroll records, and skip reports from October 2024 to March 2025. The MOU was drafted after further negotiations on the specific terms and was fully executed as of February 21, 2025.

18. In April 2025 *Saldana* and *Bryant* were consolidated pursuant to a stipulation by counsel for all Plaintiffs for the purpose of simplifying the approval process for the PAGA settlement.

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19. On January 22, 2026, a Case Management Conference was held in which all parties agreed to add the named plaintiffs, Amanda Hale and Jesus Gomez, in *Hale* to the PAGA settlement The counsel for Hale will be added as additional counsel.

20. On January 23, 2026, the court issued an order scheduling Plaintiffs' Motion for PAGA approval for April 3, 2026.

III. <u>The Settlement Terms</u>

21.Under the settlement, as outlined in the MOU, Defendants will pay a non-reversionary settlement amount with a base Gross Settlement Amount of $1,647,500, subject to the escalator increase described below (as so increased, the "Gross Settlement Amount" or "GSA"). The GSA is inclusive of payments to the LWDA and Aggrieved Employees, costs of settlement administration and reasonable attorney's fees and costs. Defendants represented that there were 694,859 PAGA Pay Periods during the PAGA Period of September 14, 2020 through October 16, 2024, and the base Gross Settlement Amount was calculated to cover up to 764,345 PAGA Pay Periods, a ten percent increase over the represented figure. Under the Settlement Agreement, if the actual number of PAGA Pay Periods worked during the PAGA Period exceeds 764,345, the Gross Settlement Amount automatically increases by the number of additional pay periods multiplied by $1,647,500 divided by 694,859, and the adjusted amount constitutes the Gross Settlement Amount for all purposes under the Settlement Agreement, including the calculation of the maximum PAGA Counsel Fees Payment. Defendants are required to provide PAGA Member Data sufficient for the Settlement Administrator to determine the actual total number of PAGA Pay Periods, and the Settlement Administrator calculates the escalator increase from that final data. The amounts stated below are therefore estimates calculated on the base Gross Settlement Amount and will be greater to the extent the escalator increase applies. After payment of settlement administration costs, Plaintiffs' service awards, and reasonable attorney's fees and costs, Plaintiffs presently estimate that at least approximately $950,000.00 will remain (the "Net Settlement Amount" or "NSA"). Seventy-five percent of the NSA (at least approximately $712,500.00) will go to the LWDA, and the remaining 25% (at least approximately $237,500.00) will be distributed to the Aggrieved Employees. The NSA will be allocated to Aggrieved Employees on a payperiod basis, as calculated by the Settlement

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Administrator. Aggrieved Employees who worked for Defendants for more workweeks, and likely experienced more of the alleged violations, will therefore be compensated proportionately.

22. The Parties have jointly selected CPT Group as the Settlement Administrator. The Settlement Administrator has submitted a bid for the Administration Fee of no more than $75,000.

23. Defendants will fund the GSA within 21 days of being provided the final accounting of funds by the settlement administrator, which shall be in within 21 calendar days of the "Effective Date." The Effective Date is 65 days after the Court has entered an Order and Judgment approving the settlement terms. Within 14 calendar days after Defendants fund the Gross Settlement Amount, the Administrator will issue checks for the Administration Expenses Payment, the PAGA Counsel Fees Payment, the PAGA Counsel Litigation Expenses Payment, and the PAGA Representative Enhancement Payments.

24. The PAGA Release Period, from September 14, 2020, to the date of the Court's approval of the settlement (subject to the escalator clause) was agreed upon by all Parties, and Defendants have thereby waived any statute of limitations defense to the September 2024 start date.

IV. <u>The Settlement is Fair, Adequate , and Reasonable</u>

25. On November 7, 2024, the Plaintiffs in both *Saldana* and *Bryant* engaged in mediation with the assistance of experienced mediator Dave Carothers to seek a resolution for both matters. A resolution was reached with a total settlement amount of $1,675,000.00.

26. In January 2026, the parties conferred with counsel in Hale and reached an agreement to add Amanda Hale and Jesus Gomez as named plaintiffs in the case, along with their PAGA claims, and add Hale's counsel as co-counsel. Based on these revisions, Plaintiff Rodgers withdrew her objections to the revised settlement agreement and has been added to the long form settlement agreement.

V. <u>Attorney's Fees and Litigation Costs</u>

27. Attached as Exhibit 1 are true and correct copies of my firm's time records for this case. The time reflected in Exhibit 1 is limited to work performed by attorneys Robert Ottinger, Lynsey Johnson, Paraskevi Batsikas, and Katherine Roussos; non-attorney time has been excluded. Ms. Batsikas, and then Ms. Johnson, and finally Ms. Roussos were the main attorneys working on

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this case, in succession, under the supervision of Mr. Ottinger. These records reflect the actual tasks performed in relation to this case, and the fee associated with that attorney's work.

28. The requested attorney rates are reasonable in view of the qualifications of the staff who worked on this case. For the 252.2 hours of attorney time expended by the firm on this case, this results in a lodestar of $189,410.00.

29. Attached hereto as Exhibit 2 are true and correct copies of my firm's costs records for this case to date showing that the firm has incurred approximately $41,984.46 in costs for both Saldana and Bryant.

30. Lynsey Johnson was an employment attorney at The Ottinger Firm, P.C. from September 2023 to December 2024. Ms. Johnson has extensive experience in employment law and complex litigation and she represents employees in employment representative and class action lawsuits at both the state and federal levels. Ms. Johnson received her Juris Doctorate from the University of California, College of the Law, and a Bachelor of Arts with honors in Politics from The University of San Francisco. Ms. Johnson has been recognized by The Best Lawyers in America, "Ones to Watch: Labor and Employment Law – Management" for two consecutive years (2022 and 2023). The Ottinger Firm requests a rate of $750.00 per hour for Ms. Johnson's work on this case.

31. Paraskevi Batsikas was an associate at The Ottinger Firm, P.C., and their contribution to the case were significant for its success. The Ottinger Firm requests a rate of $650.00 per hour for their work on this case.

32. Katherine Roussos is an employment attorney at The Ottinger Firm, P.C. who came to the firm with five years of experience as an attorney working in civil litigation. She has worked on this case throughout the settlement approval process including drafting the previous Motion to Sever. The Ottinger firm requests a rate of $750.00 per hour for Ms. Roussos' work on this case.

33. Our previous experience in litigating wage and hour class actions also supports the reasonableness of the fee request, as does the caliber of opposing counsel. Our experience in similar matters was integral in evaluating the strengths and weaknesses of the case against Defendants and the reasonableness of the settlement. Practice in the narrow field of wage and hour litigation, especially in PAGA cases, requires particular attention to nuances concerning ever-evolving

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procedural and substantive issues. Because it is reasonable to compensate us commensurate with skill, reputation, and experience, the requested fee award warrants this Court's final approval. Furthermore, we zealously litigated this matter against Defendant's Counsel, who themselves have extensive experience in employment law.

34. The Ottinger Firm P.C. should be compensated for undertaking these risks on a pure contingency basis. Since undertaking representation of Plaintiffs our firm has borne all the costs of litigation without receiving any compensation to date for the claims in this case. During this time, they will have expended more than $41,984.46 in costs, and devoted significant time to this litigation. Their efforts have included, among other things, conferring with Plaintiff to identify and gather information about the claims in this lawsuit, drafting pleadings, reviewing pay and time records from Defendants, drafting a detailed mediation brief, participating in mediation, drafting, finalizing, amending, and obtaining approval of the Settlement, and addressing post-Settlement issues such as the claims administration process. Given the considerable potential for adverse outcomes in this case, the contingent risk was great. This litigation also took a considerable amount of time and effort that the firm could have spent on other cases, albeit hourly cases or lower risk contingency cases. The quality of the firm's work, and the efficacy and dedication with which it was performed, should be compensated. (See, e.g., J.N. Futia Co. v. Phelps Dodge Indus., Inc. (S.D.N.Y. 1982) 1982 U.S. Dist. LEXIS 15261.)

35. The Enhancement Awards for Plaintiffs are also entirely reasonable given their efforts in this case and the risks they undertook on behalf of the Aggrieved Employees and the State. Here, Plaintiffs advanced the interests of the Aggrieved Employees and the State by, among other things, speaking with counsel, gathering documents, providing counsel with extensive information about Defendants' policies and practices with respect to the wage and hour claims at issue, and assisting counsel in preparing for the mediation. Plaintiffs took the personal risk of potentially facing intrusive discovery and disclosure to future employers that they sued a former employer, making their future uncertain. Given these considerations, the modest enhancement award to Plaintiffs is appropriate and justified as part of the Settlement.

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

Executed on 10/21/2026, at San Francisco, California.

Robert Ottinger

Declarant
Robert Ottinger

Exhibit 1

THE OTTINGER FIRM, P.C. — ATTORNEY TIME RECORDS

Veronica Saldana v. Brinker Restaurant Corporation, et al., Case No. CGC-21-597124, and Ahmone Bryant and Susan Rodgers v. Brinker Restaurant Corporation, et al., Case No. CGC-23-608589 (consolidated). Attorney time only; non-attorney time excluded.

Date	Hours	Activity Category	Description	Rate ($)	Amount ($)	Attorney
12/23/2021	0.5	L650 - Review (NOS	Review of amended complaint	650	325.00	Paraskevi Batsikas
12/22/2021	0.3	Communication (internal)	Internal communication re: Brinker FAC complaint	650	195.00	Paraskevi Batsikas
2/10/2023	0.2	Communication (with opposition/outside counsel)	Receipt and review of emails from OPC re individual stipulation re arb; discussion with team re same	650	130.00	Paraskevi Batsikas
2/22/2023	0.2	Communicating about/Coordinating Tasks/Cases/Calendar Events	Meeting with team to discuss status of case and outstanding tasks; discussion re viability of claims and contact with potential coco	650	130.00	Paraskevi Batsikas
2/22/2023	0.1	Communication (with opposition/outside	Receipt and review of email from potential co-co re status of brinker case	650	65.00	Paraskevi Batsikas
3/9/2023	0.4	Review and Analyze	Review new PAGA decisions	650	260.00	Paraskevi Batsikas
3/9/2023	0.1	Communication (with opposition/outside	Email to OPC re not signing stipulation for arb	650	65.00	Paraskevi Batsikas
3/21/2023	0.1	Communication (with opposition/outside	Receipt and review of email from OPC re arbitration	650	65.00	Paraskevi Batsikas
3/21/2023	0.1	Communication (with opposition/outside	Discussion with team re email from OPC as to arbitration	650	65.00	Paraskevi Batsikas
3/21/2023	0.1	Communication (with opposition/outside	Communication with OPC re authority as to position for arbitration	650	65.00	Paraskevi Batsikas
3/24/2023	0.1	Communication (with opposition/outside	Communication with OPC setting call for Monday to discuss arbitration matter	650	65.00	Paraskevi Batsikas
3/27/2023	0.1	Communication (with opposition/outside	Call with OPC re arbitration	650	65.00	Paraskevi Batsikas
3/27/2023	0.1	Communication (internal)	Update to team re call with OPC re arbitration	650	65.00	Paraskevi Batsikas
3/27/2023	0.1	Communication (with opposition/outside	Receipt and review of email from OPC confirming telephone discussion we had	650	65.00	Paraskevi Batsikas
3/28/2023	0.1	Communication (with opposition/outside counsel)	Communication with OPC re not amenable to stipulating to arb and new scheduling order	650	65.00	Paraskevi Batsikas
3/30/2023	0.1	Communicating about/Coordinating Tasks/Cases/Calendar Events	Meeting with team to discuss status of case and outstanding tasks; discussion re new scheduling order and D likely filing motion to compel arb	650	65.00	Paraskevi Batsikas
4/13/2023	0.2	Communication (with opposition/outside counsel)	Receipt and review of email from OPC with proposed language for response to court; response to OPC re same	650	130.00	Paraskevi Batsikas
4/13/2023	0.1	Communicating about/Coordinating Tasks/Cases/Calendar Events	Meeting with team to discuss status of case and any outstanding tasks; discussion re email from OPC re response to court and approval re same	650	65.00	Paraskevi Batsikas
4/20/2023	0.2	Communication (with opposition/outside	Receipt and review of final stipulation from OPC; forward signed stip to OPC	650	130.00	Paraskevi Batsikas
4/20/2023	0.1	Communicating about/Coordinating Tasks/Cases/Calendar Events	Meeting with team to discuss status of case and upcoming tasks; discussion re stip and co-counsel agreement	650	65.00	Paraskevi Batsikas

Date	Hours	Activity Category	Description	Rate ($)	Amount ($)	Attorney
4/26/2023	0.1	Communication (with opposition/outside	Communication with OPC re hearing date for motion to compel arb	650	65.00	Paraskevi Batsikas
5/4/2023	0.1	Communicating about/Coordinating Tasks/Cases/Calendar Events	Meeting with team to discuss status of the case and upcoming tasks; discussion re D to file motion to compel arb	650	65.00	Paraskevi Batsikas
5/9/2023	0.2	Meetings	Meeting with co-counsel to discuss next steps	650	130.00	Paraskevi Batsikas
5/12/2023	0.1	Communication (with opposition/outside	Communication with OPC re scheduling a call to discuss scheduling order	650	65.00	Paraskevi Batsikas
5/12/2023	0.2	Communication (with opposition/outside counsel)	Call with OPC to discuss scheduling order and ex parte application; update to team re same	650	130.00	Paraskevi Batsikas
5/16/2023	0.1	Communication (with opposition/outside	Emails with OPC re ex parte app and continuing MSC	650	65.00	Paraskevi Batsikas
5/17/2023	0.1	Communication (with opposition/outside	Communication with OPC re ex parte app and proposed trial date	650	65.00	Paraskevi Batsikas
5/17/2023	0.1	Communication (internal)	Communication with team re proposed trial date	650	65.00	Paraskevi Batsikas
5/18/2023	0.1	Communicating about/Coordinating Tasks/Cases/Calendar Events	Meeting with team to discuss status of case and upcoming tasks; discussion re continuance to trial dates and MSC	650	65.00	Paraskevi Batsikas
5/18/2023	0.1	Communication (with opposition/outside	Call with OPC re proposed trial date	650	65.00	Paraskevi Batsikas
5/22/2023	0.1	Communication (with opposition/outside	Communication with OPC re proposed trial date for ex parte	650	65.00	Paraskevi Batsikas
5/23/2023	0.2	Review and Analyze	Review ex parte stip; communication with team re same	650	130.00	Paraskevi Batsikas
5/23/2023	0.1	Communication (with opposition/outside counsel)	Email to OPC forwarding signed ex parte stip; discussion re intention to amend complaint and if OPC will stipulate; update to team re same	650	65.00	Paraskevi Batsikas
5/23/2023	0.1	Communication (with opposition/outside	Communication with OPC re revisions to ex parte stip re amended complaint	650	65.00	Paraskevi Batsikas
5/23/2023	0.2	Review and Analyze	Review revised stip re trial dates	650	130.00	Paraskevi Batsikas
5/23/2023	0.1	Communication (with opposition/outside counsel)	Receipt and review of additional revisions from OPC re SAC being granted/denied and MTC deadline 30 days after ruling	650	65.00	Paraskevi Batsikas
5/23/2023	0.1	Communication (with opposition/outside	Forward executed ex parte stip to OPC	650	65.00	Paraskevi Batsikas
5/25/2023	0.1	Communication (with opposition/outside counsel)	Receipt and review of email from OPC re trial date vacated; update to team re same	650	65.00	Paraskevi Batsikas
5/25/2023	0.2	Review and Analyze	Review ex parte app from D to vacate MSC date; email to OPC with revision to stip	650	130.00	Paraskevi Batsikas
5/25/2023	0.1	Communication (internal)	Update to team re D's ex parte app and stip to vacate MSC	650	65.00	Paraskevi Batsikas
5/25/2023	0.1	Communicating about/Coordinating Tasks/Cases/Calendar Events	Meeting with team to discuss status of case and upcoming tasks	650	65.00	Paraskevi Batsikas
5/26/2023	0.1	Communication (with opposition/outside	Receipt and review of email from OPC re MSC vacated; update to team re same	650	65.00	Paraskevi Batsikas
6/8/2023	0.1	Communicating about/Coordinating Tasks/Cases/Calendar Events	Meeting with team to discuss status of case and upcoming tasks/deadlines	650	65.00	Paraskevi Batsikas

Date	Hours	Activity Category	Description	Rate ($)	Amount ($)	Attorney
6/8/2023	0.4	Review and Analyze	Review SAC drafted by co-co	650	260.00	Paraskevi Batsikas
6/13/2023	0.1	Communication (internal)	Communication with team re finalizing SAC and forwarding to OPC for review	650	65.00	Paraskevi Batsikas
6/20/2023	0.1	Communication (with opposition/outside	Communication with OPC re MTC hearing date	650	65.00	Paraskevi Batsikas
6/27/2023	0.1	Communication (internal)	Communication with team re D question as to LWDA notices for proposed Ps and D's motion to compel arbitration	650	65.00	Paraskevi Batsikas
6/26/2023	0.5	Review and Analyze	Receipt and review of D motion to compel arbitration and accompanying motion to stay proceedings, memo, declarations, etc.	650	325.00	Paraskevi Batsikas
7/9/2023	0.1	Communication (internal)	Communication with TH re LWDA notices for new Ps and MTC deadlines	650	65.00	Paraskevi Batsikas
7/10/2023	0.1	Communication (internal)	Discussion with team re LWDA notices and FAC	650	65.00	Paraskevi Batsikas
7/11/2023	0.2	Draft/Revise	Review and revised amended LWDA notice letter	650	130.00	Paraskevi Batsikas
7/20/2023	3.3	Dispositive Motions	Review research by SS; additional research in support; draft opp to D motion to compel arbitration; post for team review and discussion re same	650	2,145.00	Paraskevi Batsikas
7/12/2023	0.1	Communication (internal)	Communication with SS assigning research task for response to D MTC Arb	650	65.00	Paraskevi Batsikas
7/12/2023	0.2	Review and Analyze	Review PAGA letter; discussion with team re same	650	130.00	Paraskevi Batsikas
7/17/2023	0.1	Communication (internal)	Communication with team re filing deadline for opposition to D MTC Arb	650	65.00	Paraskevi Batsikas
7/17/2023	0.1	Communication (internal)	Communication with SS re research for opposition to D MTC Arb	650	65.00	Paraskevi Batsikas
7/24/2023	0.1	Communication (with opposition/outside counsel)	Receipt and review of email from OPC re requesting extension to 8/10; response re same	650	65.00	Paraskevi Batsikas
7/24/2023	0.1	Communication (internal)	Discussion with team re D request for extension	650	65.00	Paraskevi Batsikas
8/2/2023	0.1	Communication (with opposition/outside counsel)	Receipt and review of email from OPC requesting we stipulate to individual arb and to stay proceedings; response to OPC opposing same	650	65.00	Paraskevi Batsikas
8/2/2023	0.1	Communication (other external)	Communication with coco re status of MTC and case; schedule call to discuss further	650	65.00	Paraskevi Batsikas
8/3/2023	0.3	Dispositive Motions	Receipt and review of D reply to MTC arbitration	650	195.00	Paraskevi Batsikas
8/4/2023	0.1	Communication (other external)	Call with co-counsel	650	65.00	Paraskevi Batsikas
8/7/2023	0.2	Draft/Revise	Review and revise CMC statement; discussion with team re same	650	130.00	Paraskevi Batsikas
8/4/2023	0.1	Communication (internal)	Communication with SRS re CMC statement	650	65.00	Paraskevi Batsikas
8/7/2023	0.1	Communication (with opposition/outside	Communication with OPC re m&c; call	650	65.00	Paraskevi Batsikas
8/8/2023	0.1	Communication (with opposition/outside	Call with OPC re abatement of PAGA	650	65.00	Paraskevi Batsikas
8/9/2023	0.2	Review and Analyze	Review tentative ruling from court re D MTC arb	650	130.00	Paraskevi Batsikas
8/9/2023	0.1	Communication (other external)	Discussion with coco re next steps for filing additional PAGA and individual arb	650	65.00	Paraskevi Batsikas
8/9/2023	0.1	Communication (internal)	Communication with team re MTC ruling and next steps for filing individual arb/paga complaint with coco	650	65.00	Paraskevi Batsikas
8/11/2023	0.1	Communication (with client)	Communication with client re court ruling on MTC to compel arbitration	650	65.00	Paraskevi Batsikas
8/16/2023	0.2	Communication (with client)	Call with client to discuss pursuing her claims in individual arb	650	130.00	Paraskevi Batsikas
10/23/2023	0.1	Meetings	Meeting with team re status of case	650	65.00	Paraskevi Batsikas

Date	Hours	Activity Category	Description	Rate ($)	Amount ($)	Attorney
10/26/2023	0.1	Communicating about/Coordinating Tasks/Cases/Calendar Events	Review prior CMC order; update to team re date of next CMC and instructions from prior order	650	65.00	Paraskevi Batsikas
10/30/2023	0.1	Communication (in firm)	Communication with RO re status of PAGA case in court	650	65.00	Paraskevi Batsikas
10/30/2023	0.1	Communication (in	Call with SRS and LJ re status	650	65.00	Paraskevi Batsikas
12/12/2023	1.2	Review and Analyze	Analyze case file in preparation for arbitration hearing.	750	900.00	Lynsey Johnson
12/12/2023	0.6		Conference with Arbitrator	750	450.00	Lynsey Johnson
12/29/2023	0.1	Draft/Revise	Draft correspondence to client.	750	75.00	Lynsey Johnson
1/2/2024	0.1	Draft/Revise	draft correspondence to client.	750	75.00	Lynsey Johnson
1/4/2024	0.6	Communication (with client)	Phone call with client regarding discovery.	750	450.00	Lynsey Johnson
1/4/2024	0.3	Review and Analyze	Analyze case file and documents in preparation for call with client.	750	225.00	Lynsey Johnson
1/22/2024	0.8	Review and Analyze	Analyze document production	750	600.00	Lynsey Johnson
2/12/2024	0.3	Review and Analyze	Review case status to formulate case strategy and delegate tasks.	750	225.00	Lynsey Johnson
2/19/2024	1.6	Research	Research case law supporting motion to vacate stay	750	1,200.00	Lynsey Johnson
2/21/2024	2.8	Draft/Revise	Revise Opposition to Motion to Compel.	750	2,100.00	Lynsey Johnson
2/20/2024	0.6	Review and Analyze	Review case facts to evaluate whether we can prevail on vacating stay	750	450.00	Lynsey Johnson
2/22/2024	0.8	Research	research intervention in light of arguments made in Brinker case	750	600.00	Lynsey Johnson
3/4/2024	0.4	Review and Analyze	Analyze correspondence from opposing counsel and draft meet and confer correspondence.	750	300.00	Lynsey Johnson
3/6/2024	0.4	Draft/Revise	Begin draft of motion to lift stay	750	300.00	Lynsey Johnson
3/11/2024	0.2	Draft/Revise	Draft CMC Statement	750	150.00	Lynsey Johnson
3/26/2024	0.1	Draft/Revise	Draft correspondence to Seterah	750	75.00	Lynsey Johnson
4/15/2024	0.1	Review and Analyze	Analyze correspondence from co-counsel.	750	75.00	Lynsey Johnson
4/15/2024	0.1	Draft/Revise	Draft correspondence to co-counsel.	750	75.00	Lynsey Johnson
5/17/2024	0.3	Review and Analyze	Review files in preparation for call with counsel	750	225.00	Lynsey Johnson
5/24/2024	0.3	Communication (other external)	Phone call with Shaun Setareh re mediation	750	225.00	Lynsey Johnson
6/4/2024	1.1	Review and Analyze	Review briefing in other matter in preparation for call to assert interest in mediation	750	825.00	Lynsey Johnson
7/25/2024	0.9	Research	Research SOL and tolling argument to respond to OPC	750	675.00	Lynsey Johnson
7/26/2024	0.3	Review and Analyze	Review discovery	750	225.00	Lynsey Johnson
7/26/2024	0.7	draft/Revise	Draft PMQ depo notice to BRC	750	525.00	Lynsey Johnson
7/26/2024	0.3	Draft/Revise	Draft PMQ depo notice to BII	750	225.00	Lynsey Johnson
7/26/2024	0.3	Draft/Revise	Draft PMQ depo notice to BIPC	750	225.00	Lynsey Johnson
7/26/2024	0.2	Draft/Revise	Draft objection to notice of depo	750	150.00	Lynsey Johnson
7/26/2024	0.8	Draft/Revise	Draft correspondence to opposing counsel's response to demand.	750	600.00	Lynsey Johnson
7/26/2024	0.4	Research	research tolling and relation back doctrine applicable in arbitration	750	300.00	Lynsey Johnson
7/26/2024	0.4	Communication (with	Phone call with client	750	300.00	Lynsey Johnson
8/19/2024	0.9	Communication (with opposition/outside	phone call with OPC	750	675.00	Lynsey Johnson

Date	Hours	Activity Category	Description	Rate ($)	Amount ($)	Attorney
8/21/2024	0.4	Communication (with opposition/outside	Phone call with opposing counsel	750	300.00	Lynsey Johnson
8/21/2024	1.4	Review and Analyze	Review case law in preparation for settlement	750	1,050.00	Lynsey Johnson
9/4/2024	0.6	Communication (with opposition/outside	Phone call with counsel regarding discovery	750	450.00	Lynsey Johnson
9/9/2024	0.2	Communication (with opposition/outside	Exchange multiple correspondence with OPC	750	150.00	Lynsey Johnson
9/12/2024	1.6	Review and Analyze	Review prior cases filed against Brinker	750	1,200.00	Lynsey Johnson
9/13/2024	1.2	Draft/Revise	Draft correspondence regarding mediation to OPC	750	900.00	Lynsey Johnson
9/30/2024	0.2	Draft/Revise	Draft correspondence to OPC	750	150.00	Lynsey Johnson
10/1/2024	0.2	Communication (with	Phone call with client	750	150.00	Lynsey Johnson
10/7/2024	1.3	Draft/Revise	Draft portions of mediation brief	750	975.00	Lynsey Johnson
10/7/2024	0.6	Review and Analyze	Review Turietta	750	450.00	Lynsey Johnson
10/7/2024	0.9	Review and Analyze	Review PAGA case settlements	750	675.00	Lynsey Johnson
10/7/2024	1.4	Review and Analyze	Review documents in preparation for mediation	750	1,050.00	Lynsey Johnson
10/9/2024	0.6	Communication (with opposition/outside	Phone call with OPC regarding mediation	750	450.00	Lynsey Johnson
10/9/2024	0.3	Draft/Revise	Revise protective order	750	225.00	Lynsey Johnson
10/11/2024	0.8	Review and Analyze	Review docs in prep for mediation	750	600.00	Lynsey Johnson
10/14/2024	0.8	Communication (other external)	Phone call with expert	750	600.00	Lynsey Johnson
10/14/2025	0.7	Communication (other external)	Phone call	750	525.00	Lynsey Johnson
10/14/2024	0.4	Communication (with opposition/outside	Phone call with OPC	750	300.00	Lynsey Johnson
10/15/2024	0.2	Communication (with opposition/outside	exchange multiple correspondence with OPC	750	150.00	Lynsey Johnson
10/15/2024	0.4	Communication (with opposition/outside	Phone call with counsel re data	750	300.00	Lynsey Johnson
10/21/2024	1.1	Review and Analyze	Review data	750	825.00	Lynsey Johnson
10/22/2025	0.3	Communication (other external)	Phone call with expert	750	225.00	Lynsey Johnson
10/23/2024	1.2	Review and Analyze	Review policies	750	900.00	Lynsey Johnson
10/23/2024	1.5	Review and Analyze	Review data	750	1,125.00	Lynsey Johnson
10/23/2024	1.3	Review and Analyze	Review rulings on PAGA approval	750	975.00	Lynsey Johnson
10/23/2024	0.9	Review and Analyze	Review expert report in class	750	675.00	Lynsey Johnson
10/25/2024	0.6	Communication (other external)	Call with expert	750	450.00	Lynsey Johnson
10/25/2024	0.6	Review and Analyze	Review crandall report	750	450.00	Lynsey Johnson
10/25/2024	2.2	Draft/Revise	Draft agreement	750	1,650.00	Lynsey Johnson
10/25/2024	1.3	Review and Analyze	Review data and documents	750	975.00	Lynsey Johnson

Date	Hours	Activity Category	Description	Rate ($)	Amount ($)	Attorney
10/28/2024	0.3	Communication (other external)	Call with expert	750	225.00	Lynsey Johnson
10/28/2024	0.8	Review and Analyze	Review data	750	600.00	Lynsey Johnson
10/28/2024	0.3	Draft/Revise	Draft email to OPC re data	750	225.00	Lynsey Johnson
10/28/2024	4.5	Trial Preparation and Support	Mediation prep	750	3,375.00	Lynsey Johnson
10/28/2024	1.1	Draft/Revise	draft outline claims for data analysis	750	825.00	Lynsey Johnson
10/30/2024	1.2	Review and Analyze	Review data in light of call	750	900.00	Lynsey Johnson
10/30/2024	0.8	Draft/Revise	Draft agreement	750	600.00	Lynsey Johnson
10/30/2024	1.5	Draft/Revise	Draft portion of mediation brief	750	1,125.00	Lynsey Johnson
10/30/2024	0.8	Draft/Revise	Draft outline for expert	750	600.00	Lynsey Johnson
10/30/2024	0.6	Communication (other external)	Call with expert	750	450.00	Lynsey Johnson
10/30/2024	0.3	Communication (other external)	Phone call with expert	750	225.00	Lynsey Johnson
10/30/2024	0.8	Communication (with opposition/outside	Phone call with OPC	750	600.00	Lynsey Johnson
10/30/2024	1.5	Review and Analyze	Review case law cited in Class Cert Briefing	750	1,125.00	Lynsey Johnson
10/30/2024	0.3	Communication (other external)	Phone call with expert	750	225.00	Lynsey Johnson
10/30/2024	0.9	Review and Analyze	Review case law regarding attestations	750	675.00	Lynsey Johnson
10/30/2024	2	Review and Analyze	Analyze prior PAGA settlements	750	1,500.00	Lynsey Johnson
10/31/2024	0.8	Review and Analyze	review law in light of Defendant's attestation claim	750	600.00	Lynsey Johnson
10/31/2024	1.5	Review and Analyze	Review new data from OPC	750	1,125.00	Lynsey Johnson
10/31/2024	3.5	Draft/Revise	Mediation brief and damages calculation	750	2,625.00	Lynsey Johnson
10/31/2024	0.8	Communication (other external)	Phone call with expert	750	600.00	Lynsey Johnson
11/1/2024	4.5	Trial Preparation and Support	Mediation prep	750	3,375.00	Lynsey Johnson
11/2/2024	0.9	Communication (other external)	Phone call with expert	750	675.00	Lynsey Johnson
11/2/2024	1.3	Review and Analyze	Review data in light of call with expert	750	975.00	Lynsey Johnson
11/2/2024	0.3	Communication (with opposition/outside	Phone call with OPC	750	225.00	Lynsey Johnson
11/2/2024	2.2	Review and Analyze	Review prior PAGA settlements	750	1,650.00	Lynsey Johnson
11/2/2024	1.4	Research	Research amendment of claims	750	1,050.00	Lynsey Johnson
11/2/2024	1.4	Review and Analyze	Review PAGA letters and complaints evaluating claims	750	1,050.00	Lynsey Johnson
11/3/2024	2.5	Review and Analyze	Mediation cases review	750	1,875.00	Lynsey Johnson
11/4/2024	0.4	Communication (with	Call with client	750	300.00	Lynsey Johnson
11/4/2024	8.5	Review and Analyze	Mediation prep	750	6,375.00	Lynsey Johnson
11/4/2024	0.8	Review and Analyze	Review data in light of call	750	600.00	Lynsey Johnson
11/4/2024	0.4	Communication (other external)	Call with expert	750	300.00	Lynsey Johnson

Date	Hours	Activity Category	Description	Rate ($)	Amount ($)	Attorney
11/4/2024	0.4	Communication (other external)	Call with expert	750	300.00	Lynsey Johnson
11/4/2024	0.3	Communication (with	Call with Bryant	750	225.00	Lynsey Johnson
11/4/2024	0.6	Communication (other external)	Call with expert	750	450.00	Lynsey Johnson
11/4/2024	1.3	Review and Analyze	Review pay codes and data	750	975.00	Lynsey Johnson
11/5/2024	2.5	Review and Analyze	Review declarations and report in light of OPC's position	750	1,875.00	Lynsey Johnson
11/5/2024	3.5	Draft/Revise	Revise brief and damages model in light of review	750	2,625.00	Lynsey Johnson
11/5/2024	0.9	Communication (other external)	Phone call with OPC	750	675.00	Lynsey Johnson
11/5/2024	0.4	Communication (with opposition/outside	Phone call with OPC	750	300.00	Lynsey Johnson
11/5/2024	0.4	Communication (other external)	Phone call with expert	750	300.00	Lynsey Johnson
11/5/2024	2.5	Review and Analyze	Review case law and policies in light of discussion with OPC	750	1,875.00	Lynsey Johnson
11/5/2024	0.9	Communication (other external)	Phone call with Expert	750	675.00	Lynsey Johnson
11/6/2024	0.9	Communication (with opposition/outside	Call with OPC	750	675.00	Lynsey Johnson
11/6/2024	2.5	Review and Analyze	Review skip data and expert report	750	1,875.00	Lynsey Johnson
11/6/2024	0.6	Communication (with opposition/outside	Call with OPC	750	450.00	Lynsey Johnson
11/6/2024	0.9	Communication (other external)	Call with expert	750	675.00	Lynsey Johnson
11/6/2024	1.4	Communication (other external)	Call with expert	750	1,050.00	Lynsey Johnson
11/6/2024	3.5	Review and Analyze	Damages analysis in light of new data	750	2,625.00	Lynsey Johnson
11/6/2024	0.6	Communication (other external)	Call with expert	750	450.00	Lynsey Johnson
11/7/2024	11.5	Appear for/Attend	Attend mediation; begin draft of MOU	750	8,625.00	Lynsey Johnson
11/12/2024	2.4	Draft/Revise	Draft individual settlement agreement	750	1,800.00	Lynsey Johnson
11/13/2024	1.4	Review and Analyze	review authority to address scope of release	750	1,050.00	Lynsey Johnson
11/13/2024	2.5	Draft/Revise	Prepare Joint Stipulation of PAGA settlement	750	1,875.00	Lynsey Johnson
11/13/2024	0.6	Communication (with opposition/outside	Phone call with OPC	750	450.00	Lynsey Johnson
11/13/2024	6.5	Draft/Revise	Draft Supplemental Brief	750	4,875.00	Lynsey Johnson
11/19/2024	0.4	Communication (with opposition/outside	Phone call with OPC	750	300.00	Lynsey Johnson
11/27/2024	12	Appear for/Attend	Attend mediation	850	10,200.00	Robert Ottinger
12/10/2024	0.4	Draft/Revise	Draft amended PAGA letter	750	300.00	Lynsey Johnson
12/10/2024	0.8	Draft/Revise	Revise MOU	750	600.00	Lynsey Johnson
12/10/2024	0.9	Review and Analyze	Review orders in SF evaluating issues in preparation for approval	750	675.00	Lynsey Johnson

Date	Hours	Activity Category	Description	Rate ($)	Amount ($)	Attorney
12/10/2024	0.6	Review and Analyze	Review cases cited in MOU evaluating overlap of claims	750	450.00	Lynsey Johnson
12/10/2024	0.4	Research	Research regaring impact of amendment	750	300.00	Lynsey Johnson
12/10/2024	0.4	Communication (with opposition/outside	Phone call with OPC	750	300.00	Lynsey Johnson
12/11/2024	0.7	Review and Analyze	Review co-counsel agreement	750	525.00	Lynsey Johnson
12/12/2024	0.2	Communication (other external)	Exchange correspondence with counsel and mediator	750	150.00	Lynsey Johnson
12/13/2024	0.4	Communication (with opposition/outside	Phone call with OPC	750	300.00	Lynsey Johnson
12/16/2024	0.1	Communication (with opposition/outside	Call with Elliott	750	75.00	Lynsey Johnson
12/16/2024	0.6	Communication (other external)	Call with mediator	750	450.00	Lynsey Johnson
12/19/2024	0.6	Communication (with opposition/outside	Phone call with opposing counsel	750	450.00	Lynsey Johnson
12/19/2024	0.6	Communication (with	Phone call with client	750	450.00	Lynsey Johnson
12/24/2024	0.4	Communication (other external)	Call with coco and mediator David Caruthers	850	340.00	Robert Ottinger
1/15/2025	0.4	Communication (with opposition/outside	Call with OPC and coco re settlement agreement.	850	340.00	Robert Ottinger
1/16/2025	3.2	Communication (in firm)	Calls with LJ re mediation and settlement.	850	2,720.00	Robert Ottinger
1/31/2025	0.5	Review and Analyze	Review of case notes + docs, MOU redline	750	375.00	Katherine Roussos
2/27/2025	1.6	Review and Analyze	review of draft settlement, compare to others samples to cross check JF	750	1,200.00	Katherine Roussos
3/28/2025	0.7	Research	re consolidation + proposed stip	750	525.00	Katherine Roussos
3/31/2025	0.1	Communication (in	msgs re stip	750	75.00	Katherine Roussos
4/14/2025	0.2	Review and Analyze	MOU for enforceability, msg to RO	750	150.00	Katherine Roussos
4/24/2025	0.7	Review and Analyze	call with RO, review of SAR and MOU, msg to JF	750	525.00	Katherine Roussos
5/19/2025	0.4	Review and Analyze	mou and co-counsel agreement	750	300.00	Katherine Roussos
5/19/2025	0.2	Communication (other external)	call with Lindley from Montage re strategy	750	150.00	Katherine Roussos
5/21/2025	1.8	Drafting	email re withdrawal	750	1,350.00	Katherine Roussos
5/29/2025	0.2	Review and Analyze	review of MP edits to ethics letter	750	150.00	Katherine Roussos
5/29/2025	0.5	Draft/Revise	letter to OPC re ethics viol	750	375.00	Katherine Roussos
5/30/2025	0.2	Communication (in firm)	msgs w/ JF and RO re status of settlement	750	150.00	Katherine Roussos
6/2/2025	0.2	Email	to advising attorney about updates	750	150.00	Katherine Roussos
6/3/2025	0.9	Review and Analyze	Comms with contract atty, RO about claims, review of Hale Motion and mediation brief	750	675.00	Katherine Roussos
6/4/2025	0.1	Communication (in firm)	disc with RO about status of conflict with coco	750	75.00	Katherine Roussos
6/4/2025	0.1	Email	to contract atty asking for update on review of the situation	750	75.00	Katherine Roussos
6/5/2025	0.2	Communication (in firm)	msgs with RO and MP re plan for next steps, motion to disqualify	750	150.00	Katherine Roussos
6/5/2025	0.2	Communication (in	strategy call re disqual motion	750	150.00	Katherine Roussos
6/6/2025	1.8	Draft/Revise	letter revoking agreement, draft response email	750	1,350.00	Katherine Roussos

Date	Hours	Activity Category	Description	Rate ($)	Amount ($)	Attorney
6/10/2025	0.2	Email	review of emails from Defendant to coco on status of rep dispute and MOU	750	150.00	Katherine Roussos
6/23/2025	2.5	Drafting	motion to disqualify	750	1,875.00	Katherine Roussos
6/24/2025	4.5			750	3,375.00	Katherine Roussos
6/24/2025	0.3	Communication (in firm)	meeting with RO and JF re upcoming CMC	750	225.00	Katherine Roussos
6/25/2025	4.4	Draft/Revise	motion to disqualify and decl of RO	750	3,300.00	Katherine Roussos
6/25/2025	0.6	Draft/Revise	CMC statement	750	450.00	Katherine Roussos
7/1/2025	0.1	Email	emails to opc to confirm we can file	750	75.00	Katherine Roussos
7/1/2025	0.2	Communication (in	re filing of CMC	750	150.00	Katherine Roussos
7/1/2025	0.1	Communication (in firm)	comms re doing the motion to enforce ourselves	750	75.00	Katherine Roussos
7/2/2025	1.6	Draft/Revise		750	1,200.00	Katherine Roussos
7/8/2025	0.3	Communication (in	call re upcoming CMC	750	225.00	Katherine Roussos
7/8/2025	0.8	Appear for/Attend	CMC re settlement, MOU enforcement, conflict of interest	750	600.00	Katherine Roussos
7/10/2025	0.1	Communication (with	call to CL	750	75.00	Katherine Roussos
7/21/2025	0.1	Email	emails about scheduling call with Def counsel	750	75.00	Katherine Roussos
7/23/2025	0.3	Communication (with opposition/outside	call re upcoming joint motions	750	225.00	Katherine Roussos
7/23/2025	0.5	Draft/Revise	PAGA letter, sent to Motage for review	750	375.00	Katherine Roussos
7/25/2025	0.1	Communication (in firm)	msgs with RO and email to Lindley about PAGA letter	750	75.00	Katherine Roussos
7/25/2025	0.1	Communication (with opposition/outside	email to OPC with draft revised PAGA letter	750	75.00	Katherine Roussos
7/25/2025	0.1	Research	motions to sever	750	75.00	Katherine Roussos
7/28/2025	0.1	Communication	call with Lindley (Montage) re paga letter	750	75.00	Katherine Roussos
7/28/2025	0.1	Draft/Revise	new PAGA letter w/ Defense sign on	750	75.00	Katherine Roussos
7/28/2025	0.1	Email	to OPC with revised letter	750	75.00	Katherine Roussos
7/28/2025	1	Drafting	motion to sever	750	750.00	Katherine Roussos
7/28/2025	0.6	Research	on the standard for severing cases	750	450.00	Katherine Roussos
7/29/2025	3.4	Draft/Revise	motion to sever	750	2,550.00	Katherine Roussos
7/29/2025	0.2	Communication (with opposition/outside	re mtn to sever, paga ntc	750	150.00	Katherine Roussos
7/29/2025	0.9	Draft/Revise	PAGA letter	750	675.00	Katherine Roussos
7/30/2025	0.6	Review and Analyze	OPC motion	750	450.00	Katherine Roussos
7/30/2025	0.6	Draft/Revise	MPA and proposed order for motion to sever	750	450.00	Katherine Roussos
7/30/2025	0.1	Communication (in firm)	msgs with RO and call with MT about PAGA letter	750	75.00	Katherine Roussos
7/31/2025	1	Draft/Revise	finalizing motion and compiling exhibits	750	750.00	Katherine Roussos
7/31/2025	0.4	Communication (in firm)	about final review of motion and filing with RO and MT, calls with MT about exhibits	750	300.00	Katherine Roussos
8/14/2025	0.8	Review and Analyze	Opp to motion to sever	750	600.00	Katherine Roussos
8/18/2025	1.1	Research	for reply	750	825.00	Katherine Roussos
8/19/2025	0.2	Communication (in	call with RO about strategy for reply	750	150.00	Katherine Roussos
8/19/2025	1.5	Drafting	reply to opp to motion to sever	750	1,125.00	Katherine Roussos

Date	Hours	Activity Category	Description	Rate ($)	Amount ($)	Attorney
8/20/2025	1.3	Draft/Revise	reply to opp to mtn to sever	750	975.00	Katherine Roussos
8/21/2025	1.1	Draft/Revise	reply to opp to mtc	750	825.00	Katherine Roussos
8/22/2025	2	Draft/Revise	reply to opp to motion to sever	750	1,500.00	Katherine Roussos
8/28/2025	0.5	Draft/Revise	Revise reply to motion to severe.	850	425.00	Robert Ottinger
9/3/2025	0.2	Review and Analyze	review OPC reply to the opp to mtn to sever	750	150.00	Katherine Roussos
9/9/2025	0.4	Review and Analyze	edits to the LSA	750	300.00	Katherine Roussos
9/10/2025	0.4	Draft/Revise	edits and additions to cmc report	750	300.00	Katherine Roussos
9/10/2025	0	Communication (in	msgs with MT about CMC statement	750	0.00	Katherine Roussos
9/10/2025	0.1	Email	to OPC confirming red lines to the agreement, updating based on severing of cases	750	75.00	Katherine Roussos
9/11/2025	0.1	Email	to OPC about CMC statement	750	75.00	Katherine Roussos
9/11/2025	0.5	Email	multiple emails with parties about the CMC statement and edits	750	375.00	Katherine Roussos
9/16/2025	0.1	Email	from the court about plan for court appearance on Thursday morning	750	75.00	Katherine Roussos
9/16/2025	0.1	Communication (in firm)	updates to RO, msg to MT to get docs to court	750	75.00	Katherine Roussos
9/17/2025	0.2	Communication (other external)	w/ D's counsel about appearance tomorrow	750	150.00	Katherine Roussos
9/18/2025	1	Appear for/Attend	appearance hearing on mts	750	750.00	Katherine Roussos
9/22/2025	0.5	Draft/Revise	joint agreement statement, review of JPA	750	375.00	Katherine Roussos
9/22/2025	0.2	Communication (in	brief call with RO, message re JPA	750	150.00	Katherine Roussos
9/23/2025	0.1	Email	to OPC about motion	750	75.00	Katherine Roussos
9/25/2025	0.3	Email	final review of joint statement and emails back an forth with ES, email to OPC about motion	750	225.00	Katherine Roussos
9/29/2025	0.2	Communication (in firm)	call with MT about Brinker motion assignment	750	150.00	Katherine Roussos
10/3/2025	2.4	Draft/Revise	motion for PAGA approval	750	1,800.00	Katherine Roussos
10/6/2025	8	Draft/Revise	motion to approve PAGA MOU	750	6,000.00	Katherine Roussos
10/7/2025	0.1	Communication (in firm)	msgs to ZM and MT about client declarations and Lodestar information	750	75.00	Katherine Roussos
10/7/2025	5.5	Draft/Revise	motion for PAGA approval	750	4,125.00	Katherine Roussos
10/7/2025	0.2	Communication (with opposition/outside	discussion of plan for motion to enforce, facts around negotiations	750	150.00	Katherine Roussos
10/7/2025	0.2	Communication (in firm)	call with MT about Brinker documents needed from LJ email	750	150.00	Katherine Roussos
10/8/2025	5.1	Draft/Revise	Motion for approval and decl ISO	750	3,825.00	Katherine Roussos
10/8/2025	2.4	Draft/Revise	SAC and joint stipulation	750	1,800.00	Katherine Roussos
10/8/2025	0.7	Draft/Revise	edits to FAC, review of OPC motion	750	525.00	Katherine Roussos
	252.2		**TOTAL**		**189,410.00**	

Exhibit 2

THE OTTINGER FIRM, P.C. — LITIGATION COSTS

Veronica Saldana v. Brinker Restaurant Corporation, et al., Case No. CGC-21-597124, and Ahmone Bryant and Susan Rodgers v. Brinker Restaurant Corporation, et al., Case No. CGC-23-608589 (consolidated)

Saldana v. Brinker Restaurant Corporation, et al. — Case No. CGC-21-597124

Date	Description	Expense Category	User	Cost ($)
2021-11-09	Paga Filing Fee	PAGA filing fee	Jolen Medwid	75.00
2021-11-10	Casemail - Certified copies sent to 3 entities	Casemail - Postage & Mailings	Jolen Medwid	21.90
2021-12-14	San Francisco filing fee for complaint, summons, cover sheet, and process service. / Order #17375341	OneLegal Court Filing Fee	Tim Hansen	460.19
2021-12-20	Brinker Restaurant Corp: Personal service of summons and complaint. / Order #17375343	OneLegal Process Server Fee	Tim Hansen	41.18
2021-12-20	Brinker International, Inc.: Out of state personal service of the complaint and summons. / Order #17375342	OneLegal Process Server Fee	Tim Hansen	164.72
2021-12-20	Brinker International Payroll Co., Inc.: Out of state personal service of complaint and summons. / Order #17375344	OneLegal Process Server Fee	Tim Hansen	164.72
2021-12-29	Postage for sending FAC to OPC.	Casemail - Postage & Mailings	Jolen Medwid	3.22
2022-01-06	SF Superior Court filing fee for proof of service on all three entities. / Order# 17439267	OneLegal Court Filing Fee	Tim Hansen	12.35
2022-01-13	Filing fee for proof of services on all three entities. / Order #17456802	OneLegal Court Filing Fee	Tim Hansen	12.35
2022-05-03	Postage for mailing CMC Statement to OPC.	Casemail - Postage & Mailings	Tim Hansen	3.02
2022-05-06	Filing fee for CMC statement. / Order #18145130	OneLegal Court Filing Fee	Tim Hansen	12.87
2023-07-27	OneLegal filing fee for Opposition to Arb / Credit Sale 05180372 / Order Number 20848765 / $13.33 paid via OneLegal	OneLegal Court Filing Fee	Shiva Shah	13.33
2023-08-10	Courtesy Copy / Credit Sale 05220398 / Order Number 20848766 / Opposition courtesy copy / CCD - Standard Courtesy Copy, Zone 2 $75.00 / Convenience Fee $2.21 / SUBTOTAL $77.21	One Legal - Courtesy Copy	Shiva Shah	77.21
2023-08-11	Filing fee for CMC Statement and POS. (Order No. 20958973).	OneLegal Court Filing Fee	Jolen Medwid	13.33
2023-08-22	Courtesy Copy for CMC Statement & Proof of Service / Credit Sale 05249774 / Order Number 20958975 / Court Transaction Number 9330630 / CCD - Standard Courtesy Copy, Zone 2 $75.00 / Convenience Fee $2.21 / SUBTOTAL $77.21 / TOTAL CHARGED $77.21	One Legal - Courtesy Copy	Shiva Shah	77.21
2024-09-20	Mediation Hearing Fee from 9/20 / INVOICE NO. 24-5464-DC-01	Mediation Fee	Zach McCarthy	4,395.00
2024-10-24	Damage Expert Jeffrey Kane Retainer Fee	Invoice	Zach McCarthy	2,000.00
2024-11-12	Jeffrey Kane Statistical Consulting Services: Data Formatting and Analysis on the Saldana v. Brinker Case, 10/16/2024 - 11/6/2024 (52 hrs) / Invoice #: 2024-11-12-1	Invoice	Zach McCarthy	18,200.00
2024-11-13	Jeffrey Kane Statistical Consulting Services: Additional Data Analysis on the Saldana v. Brinker Case per settlement requirements, 11/7/2024 - 12/15/2024, 5.14 hours	Invoice	Zach McCarthy	1,800.00
2025-02-12	PACER Quarterly Invoice Account Number #2625762	Run Query on ECF/Pacer	Zach McCarthy	2.00
2025-03-05	File&ServeXpress; Transaction ID: 75680233 / 2/20/25 / Documents: MC040- NOTICE CHANGE OF ADDRESS	File&Serve; Express - Filing Fee	Zach McCarthy	11.85
2025-03-05	File&ServeXpress; Transaction ID: 75711015 / 2/25/2025 / Documents: CM-110 Case Management Statement (Plaintiff)	File&Serve; Express - Filing Fee	Zach McCarthy	11.85
2025-03-17	Jeffrey Kane Statistical Consulting Services: Data Formatting and Analysis on the Saldana v. Brinker Case, 10/16/2024 - 11/6/2024 (52 hrs) / Invoice #: 2024-11-12-1 / The invoice is $18,200 and splitting the cost with Ottinger Firm	Damage Expert	Zach McCarthy	9,100.00
2025-03-17	Jeffrey Kane Statistical Consulting Services: Additional Data Analysis on the Saldana v. Brinker Case per settlement requirements, 11/7/2024 - 12/15/2024, 5.14 hours / The invoice is 1,800 and splitting the cost with Ottinger Firm	Damage Expert	Zach McCarthy	900.00

Date	Description	Expense Category	User	Cost ($)
2025-03-17	Damage Expert Jeffrey Kane Retainer Fee / The invoice is 2,000 and splitting the cost with Ottinger Firm	Damage Expert	Zach McCarthy	1,000.00
2025-07-01	InfoTrack: Courtesy Copy - Case Management Statement (1 document)		Joana Fernandes	85.00
2025-07-09	CA: File To Existing - #76567251 - Susan Rodgers v Brinker International Inc: Case Management Statement (1 filing)		Joana Fernandes	20.75
2025-08-08	CA: File To Existing - #76809071 - Susan Rodgers v Brinker International Inc: Notice of Motion (5 filings)		Meaghan Taggart	80.75
2025-08-29	CA: File To Existing - #76960754 - Susan Rodgers v Brinker International Inc: Reply (2 filings)		Meaghan Taggart	20.75
2025-10-10	CA: File To Existing - #77280934 - Susan Rodgers v Brinker International Inc: Notice of Motion (8 filings)		Meaghan Taggart	80.75
2025-10-13	PACER QUARTERLY INVOICE / Acct Number 2625762	Run Query on ECF/Pacer	Zach McCarthy	2.70
2025-11-06	FirstLegal Invoice # 20406062 / 10/10/25 6250768 PDF / BRYANT V BRINKER / DOCS: 8 DOCS / COURTESY COPY TO JDG / DEPT 606 / Signed: DEPT 606 DROP BOX		Zach McCarthy	145.75
2025-11-07	CA: File To Existing - #77674291 - Susan Rodgers v Brinker International Inc: Reply (2 filings)		Meaghan Taggart	20.75
2025-12-01	CA: File To Existing - #77786757 - Susan Rodgers v Brinker International Inc: Case Management Statement (2 filings)		Meaghan Taggart	20.75
2026-01-13	CA: File To Existing - #78058772 - Susan Rodgers v Brinker International Inc: Stipulation and Order (2 filings)		Meaghan Taggart	42.75
2026-01-15	CA: File To Existing - #78212947 - Susan Rodgers v Brinker International Inc: Case Management Statement (2 filings)		Meaghan Taggart	22.75
2026-02-03	Invoice 20421113 / 1/08/26 6278295 PDF The Ottinger Firm, PC SFSC-SAN FRANCISCO Base Chg: $40.25 Total: $40.25 / PDF COURTESY DELIVERY / Caller: Meaghan Taggart / CGC-23-608589 Bryant & Rodgers v Brinker / DOCS: 3 DOCS / COURTESY COPY TO JDG DEPT 613	First Legal Service of Documents	Carol Cobo	40.25
2026-05-27	Court Filing fee / Customer 0099221 / TOTAL $44.25	OneLegal Court Filing Fee	Carol Cobo	44.25
2026-06-02	Order number 28068158 / Fees $44.25	OneLegal Court Filing Fee	Carol Cobo	44.25
2026-07-02	Order 28454874 / Court filing fee total $22.51 / Amended complaint	OneLegal Court Filing Fee	Carol Cobo	22.51
	Subtotal — Saldana			**39,268.01**

Bryant and Rodgers v. Brinker Restaurant Corporation, et al. — Case No. CGC-23-608589

Date	Description	Expense Category	User	Cost ($)
2023-08-29	Complex Case Filing Fee / Credit Sale 05273760 / Order Number 21069130 / Court Transaction Number 100210434 / Court Filing Fee $1,495.00 / eFiling Charge $12.95 / Convenience Fee $44.48 / FEES SUMMARY: Disbursements $1,495.00; One Legal Fees $57.43; TOTAL CHARGED $1,552.43 / Paid by Visa via OneLegal	OneLegal Court Filing Fee	Shiva Shah	1,552.43
2023-09-14	Filing Application, Declarations & Exhibits / Order No.: 21074718	OneLegal Court Filing Fee	Erin Conn	77.21
2023-09-15	Filing Fee re application and declaration / Order No. 21069182	OneLegal Court Filing Fee	Erin Conn	77.21
2023-09-22	Serve Civil Cover Sheet, Complaint, Summons / Order No. 21226407	OneLegal Process Server Fee	Erin Conn	41.18
2023-09-22	Process Service Fee for Civil Cover Sheet, Complaint and Summons / Order No. 21226408	OneLegal Process Server Fee	Erin Conn	41.18
2023-10-06	One Legal filing fee for Complaint, Civil Cover Sheet and Summons / Order No. 21226406	OneLegal Court Filing Fee	Erin Conn	113.25
2023-10-06	Invoice for courtesy copies for Affidavits / Order No. 21272019	One Legal - Courtesy Copy	Erin Conn	77.21
2023-10-13	Filing fee for affidavits of service. / Order No. 21272018	OneLegal Court Filing Fee	Erin Conn	13.33
2023-10-23	File and Serve courtesy copy fee ($30.60) and filing fee ($10.35) for Joint CMC Statement. Invoice No. 202310100346201	File&ServeXpress;	Jolen Medwid	40.95
2023-10-25	File and Serve courtesy copy fee ($30.36), filing fee ($10.35) and service fee ($14.95) of notice of remote appearance. Invoice No. 202310100346201	File&ServeXpress;	Jolen Medwid	55.66

Date	Description	Expense Category	User	Cost ($)
2023-10-26	File and Serve Express courtesy copy fee ($30.72), filing fee ($10.35), and service fee ($14.95) of Joint CMC Statement. Invoice No. 202310100346201.	File&ServeXpress;	Jolen Medwid	56.02
2023-10-27	Invoice for CMC Hearing courtcall / ID No. 11758591	CourtCall	Erin Conn	72.00
2023-10-27	Courtesy copies for CMC statement / Order no. 21463079	One Legal - Courtesy Copy	Erin Conn	77.21
2023-11-01	Court filing fee for CMC Statement. / Order No. 21463078	OneLegal Court Filing Fee	Erin Conn	13.33
2024-03-04	Filing re Opp to MTC Arb / Invoice No. 202402100346201	File&Serve; Express - Filing Fee	Erin Conn	58.18
2024-03-07	CourtCall ID 11802977 / re Motion and CMC	CourtCall	Janel Smith	72.00
2024-10-16	PACER Quarterly Invoice / Account Number: 2625762	Run Query on ECF/Pacer	Zach McCarthy	11.20
2025-01-31	PACER Quarterly Invoice Account #2625762	Invoice	Zach McCarthy	2.00
2025-10-02	FirstLegal Invoice #20400577 / 9/17/25 6243075 FAX / FILING-FAX/PDF RUSH / BRYANT V BRINKER / DOCS: MULTIPLE DOCS / COURTESY COPY TO JDG DEPT 606 BY 12		Zach McCarthy	264.90
	Subtotal — Bryant and Rodgers			**2,716.45**

TOTAL COSTS — BOTH MATTERS	**41,984.46**