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Attorneys for Plaintiff, DAVID MEJIA, on behalf of
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situated

Additional Counsel Listed on Following Page

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO

CENTRAL DIVISION

DAVID MEJIA, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

vs.

SCRAM OF CALIFORNIA, INC., a
corporation; and DOES 1-50, Inclusive,

Defendants.

CASE NO.: 23-CIV-03702

**DECLARATION OF LENDE F. WEBB IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: June 18, 2026
Time: 3:00 p.m.

Dept.: 2
Judge: Hon. Mark McCannon

BLUMENTAL NORDREHAUG BHOWMIK DE BLOUW LLP
Norman B. Blumenthal (Bar No. 068687)
Kyle R. Nordrehaug (Bar No. 205975)
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Attorneys for Plaintiff, DAVID MEJIA, on behalf of
himself, and on behalf of all persons similarly
situated

1 I, Lenden F. Webb, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would
3 competently testify to the following facts from my own personal knowledge. I am a named partner
4 attorney at Webb Law Group, APC (hereinafter "Class Counsel"). I am co-counsel of record for
5 Plaintiff DAVID MEJIA (hereafter "Plaintiff") in this wage and hour class action filed against
6 SCRAM of CALIFORNIA, Inc. (hereinafter "Defendant").

7 2. This declaration is being submitted in support of Plaintiff's Motion for Preliminary
8 Approval of Class Action and PAGA Settlement.

9 **I.**

10 **EXHIBITS**

11 3. Attached hereto as **Exhibit "1"** is a true and correct copy of Stipulation of Class and
12 PAGA Action Claims and Release of Claims ("Agreement" or "Settlement Agreement"). Attached
13 as **Exhibit "A"** to the Agreement is a true and correct copy of the proposed Class Notice.

14 4. Attached hereto as **Exhibit "2"** is a true and correct copy of the bid for settlement
15 administration submitted by Apex Class Action Administration, in an amount less than \$7,500.00.

16 5. Attached hereto as "**Exhibit 3**" is a true and correct copy of Webb Law Group's
17 expenses incurred this matter. Attached hereto as "**Exhibit 4**" is a true and correct copy of Webb
18 Law Group's billing entries demonstrating time spent on this matter.

19 **II.**

20 **INTRODUCTION**

21 6. Under California Rules of Court 3.769, a settlement of an entire class action, or of
22 a cause of action in a class action, or as to a party requires the approval of the court after hearing.
23 An objective evaluation of the Settlement confirms that the relief negotiated on behalf of the Class
24 is fair, reasonable, and adequate. The Settlement was negotiated by the Parties at arm's length. The
25 Settlement confers substantial benefits to the Settlement Class. The relief offered by the Settlement
26 is particularly impressive when viewed against the difficulties encountered by plaintiffs pursuing
27 wage and hour cases (*see infra*). Indeed, by settling now rather than proceeding to trial, Class
28

Members will not have to wait (possibly years) for relief, nor will they have to bear the risk of class certification being denied or of Defendants prevailing at trial.

7. There are approximately 636 pay periods at issue. The Net Settlement Amount is approximately \$7,500, which will be allocated to all Participating Class Members on a pro-rata basis according to the number of Workweeks each Participating Class Member worked during the Class Period. The entire Net Settlement Amount will be paid to all Participating Class Members who do not opt out of the Settlement resulting in an average Individual Settlement Share of \$11.79 per workweek.

8. As discussed below, the proposed Settlement satisfies all criteria for preliminary settlement approval and falls within the range of reasonableness. The average Individual Settlement Share to the Settlement Class meets awards in similar wage and hour class actions. Moreover, the proposed Settlement Class is appropriate for provisional certification. Accordingly, Plaintiffs respectfully request that the Court grants preliminary approval of the Settlement.

III.

FACTS AND PROCEDURE

A. Overview of the Litigation

9. Defendant SCRAM of CALIFORNIA is an alcoholism treatment and monitoring Company. Plaintiff David Mejia worked for Defendants as a non-exempt employee in California from April of 2022 until September 7, 2022. Declaration of David Mejia. ("DM Dec.") at ¶¶ 1-5. At all times during his employment, Plaintiff earned an hourly wage and were entitled to legally compliant meal and/or rest periods, and minimum, regular, and overtime wages for all hours worked. Throughout his employment, Plaintiff was subject to Defendants' written policies and procedures contained in, among other documents, including the Employee Handbook.

10. Generally, Plaintiff claims that Defendant failed to pay for all time worked, failed to provide compliant meal and rest periods, failed to reimburse for business expenses, failed to furnish accurate itemized wage statements, and failed to provide correct sick leave wages. Defendants forcefully deny liability for each of Plaintiff's claims. Further, Defendant asserts that they fully complied with all applicable employment laws and raised several other significant

1 defenses to Plaintiff's claims, including but not limited to, facially compliant meal and rest period
2 policies, compliant wage statements, and timely paid all wages when due.

3 11. On January 3, 2023, Plaintiff Mejia served Defendant and the Labor and Workforce
4 Development Agency ("LWDA") with a Notice of Violations ("PAGA Notice"). Plaintiff Mejia's
5 PAGA Notice set forth the facts and theories supporting Defendant's alleged violations of various
6 provisions of the California Labor Code and applicable Industrial Welfare Commissions ("IWC")
7 Wage Order and of his intent to pursue claims under California Labor Code Private Attorneys
8 General Act, Cal. Lab. Code Sections 2698 et seq ("PAGA").

9 12. On August 7, 2023, Plaintiff Mejia filed a class action complaint against Defendant
10 in the County of San Mateo Superior Court, Case Number 23-CV-03702 (the "Action"). The Action
11 alleged nine causes of action against Defendants for: (1) Unfair Competition in Violation of Cal.
12 Bus. & Prof. Code §§ 17200, et seq.; (2) Failure to Pay Minimum Wages in Violation Of Cal. Lab.
13 Code §§ 1194, 1197 & 1197.1; (3) Failure to Pay Overtime Wages in Violation Of Cal. Lab. Code
14 §§ 510, et seq.; (4) Failure to Provide Required Meal Periods in Violation Of Cal. Lab. Code §§
15 226.7 & 512 and the Applicable IWC Wage Order; (5) Failure to Provide Required Rest Periods in
16 Violation Of Cal. Lab Code §§ 226.7 & 512 and the Applicable IWC Wage Order; (6) Failure to
17 Provide Accurate Itemized Statements in Violation Of Cal. Lab. Code § 226; (7)) Failure to
18 Reimburse Employees for Required Expenses in Violation of Cal. Lab. Code § 2802; and (9)
19 Failure to Pay Sick Wages in Violation of Cal. Labor Code §§201-204.

20 13. Plaintiff commenced written discovery in November of 2023. Subsequently, the
21 Parties agreed to mediate the Action. To prepare for mediation, Class Counsel conducted significant
22 research concerning the documents, and with the assistance of a retained expert, analyzed the
23 representative sample of time records and payroll data to determine Defendant's potential damage
24 exposure.

25 14. Class Counsel then used this analysis in conjunction with the anecdotal evidence
26 provided by Plaintiff to obtain detailed discovery on both liability and damages.

27 15. On November 19, 2025, the Parties participated in a full day mediation with
28 mediator Judge William C. Pate, a respected mediator of wage and hour class and representative

actions. Judge Pate helped manage the Parties' expectations and provided a useful, neutral analysis of the issues and risks to both sides. The Parties made substantial progress with Judge Pate's assistance. The mediation, however, concluded without a settlement. Following months of continued settlement negotiations, the parties ultimately arrived at a settlement, the complete and final terms of which are now set forth in the Agreement. Class Counsel submit that the Settlement constitutes a fair, adequate, and reasonable compromise of the claims at issue.

B. Class Counsel Thoroughly Investigated the Factual and Legal Issues

16. Months before filing the Action, Class Counsel began its pre-filing investigation into Plaintiff Mejia's complaints. Class Counsel's investigation started with several lengthy interviews with Plaintiff Mejia. As part of the interview process, Plaintiff Mejia produced documents related to his employment, including his wage statements.

17. To prepare for mediation, Class Counsel requested documents and data points to further evaluate Plaintiff's claims and Defendant's liability exposure to the Class Members. In response to Class Counsel's request, Defendant produced the time records for the Class Members, aggregate workweek and pay period data for the Class Members, average hourly rate for the Class Members, and copies of applicable handbooks, policies, and agreements containing, inter alia, compensation, timekeeping, and meal and rest period policies. In total, Defendant produced thousands of pages of pertinent policy documents, payroll records for the Class Members, and payroll data for Class Counsel to analyze.

18. In advance of mediation, Class Counsel created several damage models. Class Counsel's models calculated Defendants' potential liability exposure while accounting for the uncertainties of continued litigation. These damage models informed and guided Class Counsel during the mediated settlement discussions.

19. Overall, Class Counsel thoroughly investigated the claims at issue, including: (1) determining Plaintiffs' suitability as putative class representatives through interviews, background investigations, and analysis of their employment files; (2) evaluating all of Plaintiff's potential claims; (3) researching similar wage and hour class actions as to the claims brought, the nature of the positions, and the type of employer; (4) analyzing the Settlement Class' time and payroll

1 records; (5) analyzing Defendant's labor policies and practices; (6) researching settlements in
2 similar cases as well as outstanding issues which could affect settlement approval; (7) evaluating
3 Plaintiff's claims and estimating Defendant's liability for purposes of settlement; (8) conducting
4 class calls to the Class Members in order to obtain more information about their claims; (9) drafting
5 the mediation brief; and (10) participating in the mediation. This investigation allowed Class
6 Counsel to fully assess the nature and magnitude of the claims being settled, as well as the
7 impediments to recovery, such as to make an independent assessment of the reasonableness of the
8 terms to which the Parties have agreed.

9 20. Class Counsel only agreed to enter the Settlement following this thorough
10 investigation and evaluation of Plaintiffs' claims. Based on this investigation of the facts, applicable
11 law, and marketplace for similar settlements, and considering the risk of significant delay,
12 uncertainty associated with litigation, and the various defenses asserted by Defendants, Class
13 Counsel firmly believe this Agreement to be in the best interests of the Class Members. Because
14 the Settlement's terms are fair, reasonable, and adequate, the Court should preliminarily approve
15 the Settlement.

16 **C. The Parties Settled with the Assistance of the Mediator**

17 21. On November 19, 2024, the Parties participated in a full day mediation with Judge
18 William C. Pate., a respected mediator of wage and hour class and representative actions. Judge
19 Pate helped manage the Parties' expectations and provided a useful, neutral analysis of the issues
20 and risks to both sides. The Parties made substantial progress with Judge Pate's assistance. Namely,
21 the Parties exchanged information regarding their respective claims and defense, including their
22 respective evaluation of the damages. The mediation concluded without a settlement. Following
23 the failed mediation, the Parties continued settlement discussions. The Parties subsequently reached
24 a settlement, the complete and final terms of which are now set forth in the Agreement. Class
25 Counsel submit that the Settlement constitutes a fair, adequate, and reasonable compromise of the
26 claims at issue.

27 22. The Gross Settlement Amount of \$100,000.00 is fair and reasonable considering the
28 nature and magnitude of the claims being settled and the various potential impediments to recovery.

(2) Estimated Exposure for Meal Period Violations

23. Further, Plaintiff alleged that Defendant failed to provide compliant meal periods. Specifically, Plaintiffs alleged that Plaintiff, Class Members, and Aggrieved Employees were unable to take timely and duty-free meal periods. Defendant argued, among other things, that their policies and procedures required Plaintiff and Class Members to take uninterrupted, statutorily compliant meal periods. Similarly, Defendant argued that any divergence from these written policies was not systematic. Thus, Defendant argued that there was no potential liability for Plaintiff's alleged meal period violations.

(3) Exposure for Rest Period Violations

24. Additionally, Plaintiff alleged that Defendant failed to provide Class Members with compliant rest periods. Specifically, Defendant's written policy failed to inform their employees that they are entitled to a rest premium if they do not take a rest break or if their rest break is non-compliant. Consequently, Plaintiff alleged that he is owed rest period premiums for rest period violations that occurred during the Class Period.

25. Again, Defendants denied liability and asserted that the workload is not such that it prevented employees from taking a break. Defendant argued that it maintained legally compliant written policies and actual practices concerning rest periods throughout the Class Period. Moreover, Plaintiff recognizes the evidentiary burdens establishing this claim. Establishing Plaintiff's rest period claim would rely, almost entirely, on Class Member testimony, making it a riskier claim at class certification and liability stages. Certification likely would have required depositions of Class Members who provided declarations, and Defendant argued that they obtained opposing declarations stating either rest breaks were taken, or rest breaks were voluntarily waived. Through discovery, Class Counsel learned that the class is often the sole employee at a single office. That employee schedules all appointments. Therefore, rest breaks are build into the calendaring system. This led to a drastic reduction in Defendant's rest break exposure.

(4) Estimated Damages for Unreimbursed Business Expenses

26. Plaintiff alleged that Defendant required Class Members to incur personal expenses for the use of their own personal cell phones without any reimbursement. Through discovery, Class

Counsel learned that the class is not required to purchase any equipment. Each office has an office phone line, and the class is not required to use cell phones. This led to a drastic reduction in Defendant's exposure.

(5) Exposure for Wage Statement Violations

27. Generally, Plaintiff alleged that Defendant's aforementioned violations resulted in derivative violations of California Labor Code sections 203 and 226(a). Class Counsel considered the arguable presence of various penalties and weighed the potential recoveries against probable defenses, including potential obstacles in proving the "willful" prong needed to obtain waiting time penalties under Labor Code section 203, showing that Class Members suffered an "injury" because of wage statement violations, as required by Labor Code 226, or that meal and rest period violations may not entitle employees like Plaintiff and the Class Members to pursue the derivative waiting time and itemized wage statement penalties. Because the other violations did not exist, or existed minimally, this led to a drastic reduction in the corresponding wage statement claim.

B. The Proposed Notice Informs the Class about the Case and Settlement

28. The Parties jointly drafted the Class Notice which fairly and neutrally informs the Class Members of their rights and remedies. The Settlement Administrator will first verify addresses, then mail the proposed Class Notice to all Class Members. The Notice will include information regarding the nature of the lawsuit, a summary of the substance of the Settlement's terms, the procedure and time period within which to requests for exclusions or objections to the Settlement, the date for the final approval hearing, the formula used to calculate settlement payments, and the terms and scope of the Released Class Claims. This method was negotiated by the Parties to ensure delivering the most reasonable method of notice to the Class Members while ensuring cost effective administration of the Settlement.

C. The Court Should Preliminarily Approve the Class Representative Service Award

29. The Settlement provides for Service Award in the amount of \$5,000.00 allocated to the Plaintiff. The service award is fair and reasonable compensation for the Plaintiff's effort bringing the action, assisting Class Counsel with the litigation and settlement, regularly conferring

1 with Class Counsel on the status of their case and the strategies for prosecuting the claims,
2 reviewing the proposed Settlement to ensure that its terms are fair and provide adequate relief for
3 the Settlement Class, and Plaintiff Mejia's general release of all claims arising out of his
4 employment.

5 30. Class Counsel, on behalf of Plaintiff, will file a formal motion for the negotiated
6 Service Award once preliminary approval of the Settlement is granted. Plaintiff respectfully
7 submits that the above showing is sufficient for preliminary approval of the negotiated Class
8 Service Award.

9 **D. The Court Should Preliminarily Approve the Class Counsel Payment**

10 31. Class Counsel took this matter on a contingency fee basis and invested significant
11 time and expense successfully prosecuting Plaintiffs' claims. As discussed *supra*, the estimated
12 average Individual Settlement Payment illustrates the demonstrably positive outcome for the
13 Participating Class Members. Considering the positive outcome for the Class Members, and in light
14 of the supporting authority, the proposed Class Counsel Payment is fair and reasonable.

15 **E. Provisional Certification for Settlement Purposes Is Appropriate**

16 32. For Settlement, Plaintiff contends, and Defendant does not dispute, that provisional
17 certification of the Class is appropriate.

18 33. Because all Class Members are Defendant's current and former employees, the class
19 is readily ascertainable from Defendant's regular business records, i.e., payroll records.

20 34. The statutes relating to each of Plaintiff's claims apply with equal force and effect
21 to the entire Class. Factually, Defendant's policies and practices apply class-wide, and Defendant's
22 liability can be determined by facts common to all members of the class. The wage and hour issues
23 are both numerous and substantial, and a class action is the most advantageous method of dealing
24 with the claims of the Settlement Class.

25 35. Plaintiff's wage and hour claims are typical of the proposed Class because they arise
26 from the same factual basis and are based on the same legal theories applicable to the other Class
27 Members. Likewise, Plaintiff's interests are entirely coextensive with the interests of the Class.
28 Plaintiff alleges that he was injured by the same company-wide practices to which the proposed

1 Class Members were subject to and seek the same relief. Plaintiff has already demonstrated their
2 ability to advocate for the interests of the Class Member by initiating this litigation, participating
3 in mediation, and evaluating the proposed settlement to assure that it is fair.

4 36. A class action is superior to a multitude of individual lawsuits. Given the size and
5 amount of each individual claim, the Class Members likely have little incentive to litigate their
6 claims on an individual basis because the out-of-pocket expense and personal commitment
7 necessary to litigate each claim outweighs any potential recovery. In sum, class treatment is
8 superior to individual, case-by-case adjudication.

9 **G. Class Counsel's Experience**

10 37. Plaintiff, and the Settlement Class Members are represented by competent and
11 experienced counsel to pursue their claims. Webb Law Group, APC, is experienced in prosecuting
12 class action lawsuits and can competently represent the Class. Other lawyers at my firm and I have
13 extensive class litigation experience. We have handled a number of class actions and complex cases
14 and have acted both as counsel and as lead and co-lead counsel in a variety of these matters. We
15 have successfully prosecuted and obtained significant recoveries in numerous class action lawsuits
16 and other lawsuits involving complex issues of law and fact. My firm is particularly experienced
17 in wage and hour employment law class actions, including claims for overtime, expense
18 reimbursement, unlawful deduction of wages, and missed rest and meal periods. Webb Law Group
19 has been involved as class counsel in over dozens of wage and hour class actions. Webb Law Group
20 has been found to be adequate counsel by the courts throughout California. We have been approved
21 as experienced class counsel in California in contested class certification proceedings. Recently, in
22 2021, as Plaintiff's counsel, I successfully certified a class of employees in the matter of Fernandez
23 v. Suburban Propane L.P. Fresno Superior Court Case No 16CECG00418 via a motion for class
24 certification and was appointed class counsel as part of that certification. More recently, my firm
25 was appointed Class Counsel in Brown v. ESA Management San Joaquin Superior Court Case No.
26 STK-CV-UOE-2019-7162 wherein we obtained a \$3.9 million dollar settlement for the class. I
27 have reviewed my firm's cases and representation of other plaintiffs and there is no conflict or
28 representation which would prevent my firm from representing the interests of the Class this case.

1 My firm has never represented Defendant nor any affiliate of the Defendant. My firm's only interest
2 in the subject matter of this litigation is to ensure a recovery to the Class and to maximize that
3 recovery. Finally, our allegiance to the Class and the claims of the Class is not inconsistent with
4 our allegiance to pursue the claims on behalf of other employees and classes as the claims are all
5 against different and distinct employers. I can think of no conflict that would arise in our
6 representation of the Class and our adequate representation of the Class is evidenced by the
7 successful prosecution of the class claims to reach an excellent recovery for the Class. Thus, the
8 adequacy requirement for my firm is satisfied.

9 38. I am qualified to represent the Plaintiff and the Aggrieved Employees. I have extensive
10 experience with wage and hour class and representative actions litigation like this matter, and
11 employment matters in general. I can, will and have adequately represented the interests of the
12 Plaintiff, and the Aggrieved Employees throughout this action.

13 CLASS CERTIFICATION ISSUES

14 39. Plaintiff contends that the proposed Settlement meets all of the requirements for class
15 certification under California Code of Civil Procedure § 382 as demonstrated below, and
16 therefore, the Court may appropriately approve the Class as defined in the Agreement.

- 17 a. **Numerosity** - Here, Plaintiff asserts that the Class consists of approximately 101
18 members, that are current and former employees. The Class can be identified based on
19 Defendant's records and sufficiently numerous for class certification.
- 20 b. **Common Issues Predominate** - Here, Plaintiff contends that common questions of
21 law and fact are present, and specifically the common questions of whether Defendant
22 properly paid their non-exempt employees, whether the Defendant failed to pay
23 overtime wages, whether the Defendant failed to provide meal and rest periods,
24 whether class members were lawfully compensated for all hours worked, whether
25 Defendant failed to provide required expense reimbursement, whether the Defendant
26 failed to provide accurate itemized wage statements, whether the Defendant failed to
27 lawfully compensate class members for sick time, and whether Class Members are
28 entitled to damages and penalties as a result of these practices.

1 **c. Typicality** - In the instant case, Plaintiff contends that there can be little doubt that the
2 typicality requirement is satisfied. The Plaintiff, like every other member of the class,
3 worked for Defendant as non-exempt employees during the Class Period. Plaintiff
4 contends that, like every other member of the class, they were subjected to the same
5 practices and policies of Defendant and are subject to the same defenses. Thus,
6 Plaintiff asserts that his claims and the Settlement Class Members arise from the same
7 course of conduct by the Defendant, involve the same employment policies and
8 practices of Defendant, and are based on the same legal theories. For purposes of
9 settlement, Plaintiff asserts that the typicality requirement is met as to the common
10 issues presented in this case.

11 **d. Adequacy** - Plaintiff contends that the Settlement Class Members are adequately
12 represented here because Plaintiffs and representing counsel do not have any conflicts
13 of interest with other class members, and will prosecute the case vigorously on behalf
14 of the class. Plaintiff is well aware of his duties and has actively participated in the
15 prosecution of this case to date. Plaintiff effectively communicated with counsel and
16 participated in the investigation and negotiations. (See Declaration of David Mejia).
17 Second, Plaintiff retained competent counsel who are experienced in employment
18 class actions and who have no conflicts. Third, there is no antagonism between the
19 interests of the Plaintiff and those of the Settlement Class Members. Both the Plaintiff
20 and the Settlement Class Members seek monetary relief under the same set of facts
21 and legal theories.

22 40. Given the facts, this settlement is therefore certainly entitled to preliminary approval.
23 While Plaintiff believes that this case is proper for class treatment, these standards are high and
24 were this case to go to trial, the Plaintiff and the other class members would need to prove, among
25 other things, that wages were owed on a class-wide basis. This was and is a substantial risk.

26 41. The stage of the proceedings at which this Settlement was reached also militates in favor
27 of preliminary approval and ultimately, final approval of the Settlement. Class Counsel has
28 conducted a thorough investigation into the facts of the class action. Class Counsel engaged in

1 informal discovery and conducted a review and analysis of the relevant documents and data,
2 including reaching out the class members to gather evidence related to the claims.

3 42. As previously stated herein, Class Counsel is also experienced with the claims at issue
4 here, as Class Counsel previously litigated and settled similar claims in other actions.
5 Accordingly, the agreement to settle did not occur until Class Counsel possessed sufficient
6 information to make an informed judgment regarding the likelihood of success on the merits and
7 the results that could be obtained through further litigation. Based on the foregoing data and own
8 independent investigation and evaluation, Class Counsel is of the opinion that the Settlement with
9 Defendant for the consideration and on the terms set forth in the Agreement is fair, reasonable,
10 and adequate and is in the best interest of the Class in light of all known facts and circumstances,
11 including the risk of significant delay and defenses asserted by Defendant. There can be no doubt
12 that Counsel for both parties possessed sufficient information to make an informed judgment
13 regarding the likelihood of success on the merits and the results that could be obtained through
14 further litigation.

14 **CLASS COUNSEL LITIGATION EXPENSES PAYMENTS**

15 43. Webb Law Group, APC has a total of \$563.35 in hard costs for this matter. See **Exhibit 3**.

16 44. The requested costs were reasonably incurred, necessary, and a direct result of the Plaintiff
17 having to file this lawsuit to in order to collect unpaid wages due and owing, and years of extensive
18 litigation, investigation, discovery, a mediation, and other actions which required my firm and Co-
19 Counsel's firm to advance hard costs, with no guarantee of recovering them. As such, the Court
20 should award Plaintiffs' Motion for Preliminary Approval of Class and PAGA Settlement.

20 **ATTORNEYS FEES**

21 45. While this matter was taken on a contingency, my firm litigates matters on both a contingent
22 and hourly basis, thus we keep diligent billing records on all our matters. Throughout this matter,
23 each and every member of our staff has maintained detailed and accurate billing records which I,
24 along with my associates, and my Billing Coordinator, Keren Alvarado independently review and
25 audit. My firm takes great pride in its billing practices and attention to detail in reviewing its billing.

26 46. Over the years that we have worked on this matter, my firm has invested over 273.50 hours
27 in this case, and I anticipate that with the remaining work needed to be completed in order to finalize
28 approval and monitor the settlement through disbursement, we will incur additional hours of work.

1 The 273.50 hours total \$67,149.00 in work across the various staffers billing rates at my firm. See
2 **Exhibit 4.**

3 47. Having agreed to represent the Plaintiffs on a contingency basis, my firm has yet to receive
4 any compensation for the large amount of work performed on this case. As I am aware with my
5 own law firm, taking and litigating cases on a contingency basis necessarily forecloses
6 opportunities to take on additional cases where my firm could be paid on an hourly basis. In order
7 to make this economically viable, when appropriate we must be compensated with a multiplier,
8 otherwise it makes no financial sense for us to take on contingent matters when we could instead
9 have the guarantee of hourly pay.

10 48. This is especially true in the current market, where overhead has increased drastically over
11 the last few years while this case has been pending. We have been working on this matter since
12 December 2024 and as the Court is no doubt aware, there has been a great deal of inflation over the
13 past few years.

14 49. There are many alternatives where the class representatives would not prevail. In *Ketchum*,
15 the court warned that fee awards should be “fully compensatory”. (*Ketchum v. Moses* (2001) 24
16 Cal.4th at 1133). Should every defendant attempt to try individual plaintiffs in lawsuits, law firms
17 would be quickly put out of business, without the incentive of a multiplier in the event of a
18 settlement. To the contrary, defense firms get paid, regardless of whether they win or lose.

19 50. As Class Counsel, we extensively addressed the perceived risks in this case in the filed
20 Notice of Motion and Motion for Preliminary Approval. In addition to the complexity of this case,
21 Class Counsel has borne the entire risk and costs of the litigation during the entire time that it has
22 been pending, all on a pure contingency basis, and at a 0.0% interest rate, at a time when rampant
23 inflation is rising faster than it has in decades. Through the investment of substantial efforts and
24 resources, Class Counsel has secured a solid Settlement on behalf of the Settlement Class Members.
25 The settlement value necessitates compensation of Class Counsel at the agreed upon percentage as
26 the amount allocated for Class Counsel’s fees is well below the lodestar in this case.

27 **LWDA NOTICE**

28 51. At the time of filing this motion for Preliminary Approval, I will file with the Labor and
Workforce Development Agency notice of this settlement with the Settlement Agreement and

1 Motion for Preliminary Approval of Class Action and PAGA Settlement evidencing Class
2 Counsel's compliance with California Labor Code Section 2699(1)(2).

3
4 I declare under the penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct. Executed this 27th day of May, 2026, at San Diego, California.

6
7
8 **WEBB LAW GROUP**

9 By: 

10 LENDEN F. WEBB, ESQ.

11 Attorney for Plaintiff, DAVID MEJIA, on behalf
12 of himself, and on behalf of all persons similarly
13 situated
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EXHIBIT 1

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Attorneys for Plaintiff, DAVID MEJIA, on behalf of
himself, and behalf on behalf of all persons similarly
situated

Additional Counsel Listed on Following Page

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO
CENTRAL DIVISION

DAVID MEJIA, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

vs.

SCRAM OF CALIFORNIA, INC., a
corporation; and DOES 1-50, Inclusive,

Defendants.

CASE NO. 23-CIV-03702

**STIPULATION OF SETTLEMENT OF
CLASS AND PAGA ACTION CLAIMS
AND RELEASE OF CLAIMS**

Dept.: 11
Judge: Hon. Nina Shapirshteyn

Case Filed: February 14, 2023
Trial Date: Not Set.

This Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims is
entered into by and between Plaintiff David Mejia (hereinafter "Plaintiff"), an individual, on behalf
of himself, and on behalf of all persons similarly situated, and Defendant SCRAM of California,
Inc. ("Defendant"):

///

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Norman B. Blumenthal (SBN 068687)
2 Kyle R. Nordrehaug (SBN 205975)
Aparajit Bhowmik (SBN 248066)
3 Jeffrey S. Herman (SBN 280058)
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9 Attorneys for Plaintiff, DAVID MEJIA, on behalf of himself, and behalf on behalf of all persons
10 similarly situated
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1 **I. DEFINITIONS**

- 2 A. “Action” shall mean the putative class and representative action lawsuit designated
3 *David Mejia v. SCRAM of California, Inc.*, County of San Mateo Superior Court,
4 Case No. 23-CV-03702, filed August 7, 2023.
- 5 B. “Aggrieved Employees” means all current and former non-exempt employees who
6 worked for Defendant in California and paid in whole or in part as “SCRAM
7 Agents” during the period beginning January 3, 2022, through the date the Court
8 grants preliminary approval (“PAGA Period”).
- 9 C. “Agreement” or “Settlement Agreement” means this Stipulation of Settlement of
10 Class Action Claims and Release of Claims, and dismissal of PAGA Claims.
- 11 D. “Class Counsel Award” means the award of fees and expenses that the Court
12 authorizes to be paid to Class Counsel for the services they have rendered to
13 Plaintiff, and the Class Members in the Action, consisting of attorneys’ fees
14 currently not to exceed thirty-three percent (33%) of the Gross Settlement Amount
15 currently estimated to be \$35,000 plus costs of up to \$45,000 (“Cost Award”).
16 Attorneys’ fees will be divided between Class Counsel in the following percentages
17 (50% to Webb Law Group, and 50% to Blumenthal Nordrehaug Bhowmik De
18 Blouw, LLP). Plaintiff expressly consents to this fee division.
- 19 E. “Class Counsel” shall mean Lenden Webb of Webb Law Group; and Normal B
20 Blumental, Kyle R. Nordrehaug, Aparajit Bhowmik , and Nicholas J. De Blouw of
21 Blumenthal Nordrehaug Bhowmik De Blouw, LLP.
- 22 F. “Class Data” means information regarding Class Members that Defendant will in
23 good faith compile from its records and provide to the Settlement Administrator. It
24 shall be formatted as a Microsoft Excel spreadsheet and shall include to the extent
25 practicable: each Class Member’s full name; last known address; Social Security
26 Number; and dates of employment that each Class Member worked during the Class
27 Period.

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- 1 G. "Class Period" means the period beginning August 7, 2019, through the date the
2 Court grants preliminary approval.
- 3 H. "Class Representative" shall mean plaintiff David Mejia.
- 4 I. "Class" or the "Class Members" means all persons who are employed or have been
5 employed by Defendant in the state of California as hourly, non-exempt SCRAM
6 Agents at any time within the period beginning August 7, 2019, and ending on the
7 date the Court grants preliminary approval ("Class Period").
- 8 J. "Court" means the Superior Court for the State of California, County of San Mateo
9 currently presiding over the Action.
- 10 K. "Defendant" shall mean SCRAM of California, Inc.
- 11 L. "Dismissed PAGA Claims" shall mean any and all PAGA claims alleged in the
12 Representative Action Complaint filed in the County of Orange Superior Court,
13 Case No. 30-2023-01341670-CU-OE-CXC and Plaintiff's PAGA Notice to the
14 LWDA, which occurred during the PAGA Period, and expressly excluding all other
15 claims, including claims for vested benefits, wrongful termination, unemployment
16 insurance, disability, social security, worker's compensation, and PAGA claims
17 outside of the PAGA Period.
- 18 M. "Effective Date" means the date of entry by the Court of an order and judgment
19 finally approving this Settlement and either (i) the applicable date for seeking
20 appellate review of the Court's final approval order has passed without a timely
21 appeal or request for review having been made; or (ii) a California Court of Appeal
22 or the California Supreme Court has rendered a final judgment affirming the Court's
23 final approval without material modification, and the time for any further appeal has
24 expired.
- 25 N. "Funding Date" shall mean the date by which Defendant has paid the entire Gross
26 Settlement Amount to the Settlement Administrator in accord with the terms of this
27 Agreement. Defendant will pay the Gross Settlement Amount to the Settlement
28 Administrator within fifteen (15) days of the Effective Date.

- 1 O. "Gross Settlement Amount" means One Hundred Thousand Dollars and Zero Cents
2 (\$100,000.00) that Defendant must pay into the QSF (*Defined below*) in connection
3 with this Settlement, inclusive of the sum of Settlement Administration Costs, Class
4 Counsel Award, and Plaintiff's Enhancement. Defendant's share of employer
5 payroll taxes on any payments allocated as wages under this Settlement shall be paid
6 by Defendant in addition to the Gross Settlement Amount. No portion of the Gross
7 Settlement Amount will revert to Defendant. Within fifteen (15) days of final
8 approval of the class settlement, Plaintiff's counsel will request that the PAGA case
9 be dismissed, without prejudice.
- 10 P. "Individual Settlement Payments" means the amount payable from the Net
11 Settlement Amount to each Settlement Class Member.
- 12 Q. "Net Settlement Amount" or "NSA" means the Gross Settlement Amount, less Class
13 Counsel Award, Service Award, Cost Award, and Settlement Administration Costs.
- 14 R. "Notice Packet" means the Class Notice to be provided to the Class Members by the
15 Settlement Administrator in the form set forth as **Exhibit A** to this Agreement (other
16 than formatting changes to facilitate printing by the Settlement Administrator).
- 17 S. "Operative Complaint" shall mean the Representative Action Complaint filed by
18 Plaintiff on August 7, 2023, in the County of San Mateo Superior Court.
- 19 T. "Parties" means Plaintiff and Defendant, collectively, and "Party" shall mean either
20 Plaintiff or Defendant, individually.
- 21 U. "Payment Ratio" means the respective Workweeks for each Class Member divided
22 by the total Workweeks for all Class Members.
- 23 V. "Plaintiff" shall mean David Mejia.
- 24 W. "QSF" means the Qualified Settlement Fund established, designated, and
25 maintained by the Settlement Administrator to fund the Gross Settlement Amount.
- 26 X. "Released Class Claims" shall mean all class claims alleged, or reasonably could
27 have been alleged based on the facts alleged, in the Operative Complaint in the
28 Action which occurred during the Class Period, and expressly excluding all of other

claims, including claims for vested benefits, wrongful termination, unemployment insurance, disability, social security, workers' compensation, and Class claims outside of the Class Period.

Y. "Released Parties" shall mean Defendant and any of their former and present directors, officers, shareholders, owners, members, attorneys, insurers, predecessors, successors, assigns, subsidiaries, and affiliates.

Z. "Response Deadline" means the date forty-five (45) calendar days after the Settlement Administrator mails Notice Packets to Class Members and the last date on which Class Members may submit requests for exclusion or objections to the Settlement.-Neither side shall encourage any Class Member to opt out.

AA. "Service Award" means an award in the amount of \$5,000, or in an amount that the Court authorizes to be paid to the Class Representative, in addition to his Individual Settlement Payment, in recognition of his efforts and risks in assisting with the prosecution of the Action.

BB. "Settlement Administration Costs" shall mean the amount paid to the Settlement Administrator from the Gross Settlement Amount for administering the Settlement pursuant to this Agreement currently estimated not to exceed \$7,500.00.

CC. "Settlement Administrator" means Apex Class Action LLC, located at Apex Class Action, LLC, P.O. Box 54668, Irvine, CA 92619; Tel: (800) 355-0700. The Settlement Administrator establishes, designates, and maintains, as a QSF under Internal Revenue Code section 468B and Treasury Regulation section 1.468B-1, into which the amount of the Gross Settlement Amount is deposited for the purpose of resolving the claims of Settlement Class Members. The Settlement Administrator shall maintain the funds until distribution in an account(s) segregated from the assets of the Parties and any person related to the Parties. Any interest accrued will be added to the NSA and distributed to the Settlement Class Members except that if final approval is reversed on appeal, then Defendant is entitled to prompt return of the principal and all interest accrued.

1 DD. "Settlement Class Members" or "Settlement Class" means all Class Members who
2 have not submitted a timely and valid request for exclusion as provided in this
3 Agreement.

4 EE. "Settlement" means the disposition of the Action pursuant to this Agreement.

5 FF. "Workweeks," shall mean any seven (7) consecutive days beginning on Sunday and
6 ending on Saturday, in which a Class Member was employed by Defendant during
7 the Class Period in California. The Settlement Administrator will calculate the
8 Workweeks based on the Class Data and will be presumed to be correct unless a
9 particular Class Member proves otherwise to the Settlement Administrator by
10 credible written evidence. All Workweek disputes will be resolved and decided by
11 the Settlement Administrator, and the Settlement Administrator's decision on all
12 Workweek disputes will be final and non-appealable.

13 GG. "Notice Packet" means the Class Notice, the Request for Exclusion Form, the Pay
14 Period Dispute form, and the Objection form (Exhibit A)

15 **II. RECITALS**

16 A. On January 3, 2023, Plaintiff filed a Notice of Violations with the Labor and
17 Workforce Development Agency (LWDA) and served the same on Defendant.

18 B. Pursuant to Labor Code §2699.3, subd. (a), Plaintiff gave timely notice to Defendant
19 and the LWDA by sending the PAGA notice.

20 C. On August 7, 2023, Plaintiff filed the Action, alleging claims for:

- 21 1. Unfair Competition in Violation of Cal. Bus. & Prof. Code §17200 *et seq*;
- 22 2. Failure to Pay Minimum Wages in Violation of Cal. Lab. Code §§ 1194,
23 1197 & 1197.1;
- 24 3. Failure to Pay Overtime Wages in Violation of Cal. Lab. Code §§ 510;
- 25 4. Failure to Provide Required Meal Periods in Violation of Cal. Lab. Code §§
26 226.7 & 512 and the Applicable IWC Wage Order;
- 27 5. Failure to Provide Required Rest Periods in Violation of Cal. Lab. Code §§
28 226.7 & 512 and the Applicable IWC Wage Order;

6. Failure to Provide Accurate Itemized Statements in Violation of Cal. Lab. Code § 226;

7. Failure to Reimburse Employees for Required Expenses in Violation of Cal. Lab. Code § 2802; and

8. Failure to Pay Sick Wages in Violation of Cal. Lab. Code . §§201-204, 233, 246.

D. On November 19, 2024, the Parties participated in a full day mediation with mediator Judge William C. Pate, but were unable to resolve the case. The parties were later able to reach a resolution, which was subsequently memorialized in the form of a Memorandum of Understanding (“MOU”).

E. The Class Representative believes he has claims based on alleged violations of the California Labor Code, and the Industrial Welfare Commission Wage Orders. The Class Representative believes that class certification is appropriate because the prerequisites for class certification can be satisfied in the Action and this action is manageable as a PAGA representative action.

F. Defendant denies any liability or wrongdoing of any kind associated with the claims alleged in the Action, disputes any wages, damages, and penalties claimed by the Class Representative alleged in the Action, and/or alleged in the Class Representative’s Notice of Violations to the LWDA are owed, and further contends that, for any purpose other than settlement, the Action is not appropriate for class or representative action treatment. Defendant contends, among other things, that at all times it complied with the California Labor Code and the Industrial Welfare Commission Wage Orders.

G. The Class Representative is represented by Class Counsel. Class Counsel investigated the facts relevant to the Action, including conducting an independent investigation as to the allegations and reviewing documents and information exchanged through formal discovery, and reviewing documents and information provided by Defendant informally to prepare for mediation. Defendant produced for

1 the purpose of settlement negotiations certain employment data concerning the
2 Class, which Class Counsel reviewed and analyzed with the assistance of an expert.
3 Based on their own independent investigation and evaluation, Class Counsel are of
4 the opinion that the Settlement with Defendant is fair, reasonable, and adequate, and
5 is in the best interest of the Class considering all known facts and circumstances,
6 including the risks of significant delay, defenses asserted by Defendant,
7 uncertainties regarding class certification, and numerous potential appellate issues.
8 Although they deny any liability, Defendant agrees to this Settlement solely to avoid
9 the inconveniences and cost of further litigation. The Parties and their counsel have
10 agreed to settle the claims on the terms set forth in this Agreement.

11 H. This Agreement replaces and supersedes the MOU and any other agreements,
12 understandings, or representations between the Parties. This Agreement represents
13 a compromise and settlement of highly disputed claims. Nothing in this Agreement
14 is intended or will be construed as an admission by Defendant that the claims in the
15 Action of Plaintiff or the Class Members have merit or that Defendant bears any
16 liability to Plaintiff or the Class or the State of California (including the LWDA) on
17 those claims or any other claims, or as an admission by Plaintiff that Defendant's
18 defenses in the Action have merit. Nothing herein shall affect Plaintiff's rights and
19 recovery pursuant to the separately executed Individual Settlement Agreement.

20 I. The Parties believe that the Settlement is fair, reasonable, and adequate. The
21 Settlement was arrived at through arm's-length negotiations, considering all
22 relevant factors. The Parties recognize the uncertainty, risk, expense, and delay
23 attendant to continuing the Action through trial and any appeal. Accordingly, the
24 Parties desire to settle, compromise and discharge all disputes and claims arising
25 from or relating to the Action fully, finally, and forever.

26 J. The Parties agree to certification of the Class for purposes of this Settlement only.
27 If for any reason the settlement does not become effective, Defendant reserves the
28 right to contest certification of any class for any reason and reserve all available

1 defenses to the claims in the Action. The Settlement, this Agreement, and the
2 Parties' willingness to settle the Action will have no bearing on and will not be
3 admissible in connection with any litigation.

4 Based on these Recitals, the Parties agree as follows:

5 **III. TERMS OF AGREEMENT**

6 A. Settlement Consideration and Settlement Payments by Defendant.

7 1. Settlement Consideration. In full and complete settlement of the Action, and
8 in exchange for the releases set forth below, Defendant will pay the sum of
9 One Hundred Thousand Dollars Zero Cents (\$100,000.00). The Gross
10 Settlement Amount will be used to pay the Individual Settlement Payments,
11 the Service Award, Cost Award, the Class Counsel Award, and the
12 Settlement Administration Costs, as specified in this Agreement. The Parties
13 agree that this is a non-reversionary Settlement and that no portion of the
14 Gross Settlement Amount shall revert to Defendant. Other than the
15 Defendant's share of employer payroll taxes and as provided in Section
16 III.A.2 below, Defendant shall not be required to pay more than the Gross
17 Settlement Amount. The Administrator will disburse the entire Gross
18 Settlement Amount without asking or requiring Participating Members or
19 Aggrieved Employees to submit any claim as a condition of payment.
20 Within fifteen (15) days of final approval of the class settlement, Plaintiff's
21 Counsel will request that the PAGA case be dismissed, without prejudice.

22 2. Settlement Payment. Defendant shall deposit the Gross Settlement Amount
23 into the QSF, through the Settlement Administrator on the Funding Date.
24 Within fifteen (15) days after Funding Date, the Settlement Administrator
25 will mail checks for all Individual Settlement Amounts, the Class Counsel
26 Award, the Settlement Administration Costs, and the Service Award.
27 However, Disbursement of the Class Counsel Award and the Settlement
28 Administration Costs shall not precede disbursement of Individual

1 Settlement Payments. Any interest accrued will be added to the NSA and
2 distributed to the Settlement Class Members except that if final approval is
3 reversed on appeal, then Defendant is entitled to prompt return of the
4 principal and all interest accrued.

5 3. Defendant's Share of Payroll Taxes. The Gross Settlement Amount of
6 \$100,000 shall be allocated 20% to wages and 80% to penalties. Defendant's
7 share of employer-side payroll taxes is due separately and in addition to the
8 Gross Settlement Amount and shall be paid together with the Gross
9 Settlement Amount on the Funding Date.

10 B. Release by Settlement Class Members. As of the Funding Date, in exchange for the
11 consideration set forth in this Agreement, Plaintiff and the Settlement Class Members
12 release the Released Parties from the Released Class Claims.

13 C. Conditions Precedent: This Settlement will become final and effective only upon the
14 occurrence of all of the following events:

- 15 1. The Court enters an order granting preliminary approval of the Settlement;
- 16 2. The Court enters an order granting final approval of the Settlement and a
17 Final Judgment;
- 18 3. If an objector appears at the final approval hearing, the time for appeal of the
19 Final Judgment and Order Granting Final Approval of Class Action
20 Settlement expires; or, if an appeal is timely filed, there is a final resolution
21 of any appeal from the Judgment and Order Granting Final Approval of
22 Class Action Settlement; and
- 23 4. Defendant fully funds the Gross Settlement Amount.

24 D. Nullification of Settlement Agreement. If the Court does not preliminarily or finally
25 approve this Settlement Agreement, fails to become effective, or is reversed,
26 withdrawn, or materially modified by the Court, or in any way prevents or prohibits
27 Defendant from obtaining a complete resolution of the Released Class Claims and
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Dismissed PAGA Claims, or if Defendant fails to fully fund the Gross Settlement Amount:

1. This Settlement Agreement shall be void *ab initio* and of no force or effect, and shall not be admissible in any judicial, administrative, or arbitral proceeding for any purpose or with respect to any issue, substantive or procedural, except as necessary to approve, interpret or enforce this Settlement Agreement;
2. The conditional class certification (obtained for any purpose) shall be void *ab initio* and of no force or effect, and shall not be admissible in any judicial, administrative, or arbitral proceeding for any purpose or with respect to any issue, substantive or procedural; and
3. None of the Parties to this Settlement will be deemed to have waived any claims, objections, defenses, or arguments in the Action, including with respect to the issue of class certification.

E. In the event that Defendant fails to fully fund the Gross Settlement Amount, Defendant shall bear the sole responsibility for any cost to issue or reissue any curative notice to the Settlement Class Members and all Settlement Administration Costs incurred to the date of nullification.

F. Certification of the Class. The Parties stipulate to conditional class certification of the Class for the Class Period for purposes of settlement only. In the event that this Settlement is not approved by the Court, fails to become effective, or is reversed, withdrawn or modified by the Court, or in any way prevents or prohibits Defendant from obtaining a complete resolution of the Released Class Claims and Dismissed PAGA Claims, the conditional class certification (obtained for any purpose) shall be void *ab initio* and of no force or effect, and shall not be admissible in any judicial, administrative or arbitral proceeding for any purpose or with respect to any issue, substantive or procedural. Defendant expressly reserves its right to oppose class

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1 certification in the Action or any other action should this Settlement not become
2 effective.

3 G. Tax Liability. The Parties make no representations as to the tax treatment or legal
4 effect of the payments called for, and Plaintiff, and/or the Class Members are not
5 relying on any statement or representation by the Parties in this regard. Plaintiff,
6 and/or Class Members understand and agree that they will be responsible for the
7 payment of any taxes and penalties assessed on any Service Award, and/or the
8 Individual Settlement Payments described and will be solely responsible for any
9 penalties or other obligations resulting from their personal tax reporting of the
10 Service Award, and/or Individual Settlement Payments.

11 H. Circular 230 Disclaimer. Each Party to this Agreement (for purposes of this section,
12 the “acknowledging party” and each Party to this Agreement other than the
13 acknowledging party, an “other party”) acknowledges and agrees that: (1) no
14 provision of this Agreement, and no written communication or disclosure between or
15 among the Parties or their attorneys and other advisers, is or was intended to be, nor
16 shall any such communication or disclosure constitute or be construed or be relied
17 upon as, tax advice within the meaning of United States Treasury Department circular
18 230 (31 CFR part 10, as amended); (2) the acknowledging party (a) has relied
19 exclusively upon his, her or its own, independent legal and tax counsel for advice
20 (including tax advice) in connection with this Agreement, (b) has not entered into
21 this Agreement based upon the recommendation of any other Party or any attorney
22 or advisor to any other Party, and (c) is not entitled to rely upon any communication
23 or disclosure by any attorney or adviser to any other party to avoid any tax penalty
24 that may be imposed on the acknowledging party, and (3) no attorney or adviser to
25 any other Party has imposed any limitation that protects the confidentiality of any
26 such attorney’s or adviser’s tax strategies (regardless of whether such limitation is
27 legally binding) upon disclosure by the acknowledging party of the tax treatment or

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1 tax structure of any transaction, including any transaction contemplated by this
2 Agreement.

3 I. Preliminary Approval Motion. As soon thereafter as practicable after the execution
4 of this Agreement, Defendant shall file with the Court a Motion for Order Granting
5 Preliminary Approval and supporting papers, which shall include this Settlement
6 Agreement. Defendant will provide Plaintiff with a draft of the Motion at least five
7 (5) business days prior to the filing of the Motion to give Plaintiff an opportunity to
8 review and comment upon the Motion.

9 J. Settlement Administrator. The Settlement Administrator shall be responsible for:
10 establishing and administering the QSF; calculating, processing and mailing
11 payments to the Class Representative, Class Counsel, and Class Members; printing
12 and mailing the Notice Packets to the Class Members as directed by the Court;
13 receiving and reporting the objections and requests for exclusion; calculating,
14 deducting and remitting all legally required taxes from Individual Settlement
15 Payments and distributing tax forms for the Wage Portion, the Penalties Portion and
16 the Interest Portion of the Individual Settlement Payments; processing and mailing
17 tax payments to the appropriate state and federal taxing authorities; providing
18 declaration(s) as necessary in support of preliminary and/or final approval of this
19 Settlement; and other tasks as the Parties mutually agree or the Court orders the
20 Settlement Administrator to perform. The Settlement Administrator shall keep the
21 Parties timely apprised of the performance of all Settlement Administrator
22 responsibilities by among other things, sending a weekly status report to the Parties'
23 counsel stating the date of the mailing, the of number of opt outs from the Settlement
24 it receives (including the numbers of valid and deficient), and number of objections
25 received.

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1 K. Notice Procedure.

2 1. Notice Packets.

3 a) The Notice Packet shall contain the Notice of Class Action
4 Settlement (“Class Notice”) in a form substantially similar to the
5 form attached as **Exhibit A**. The Class Notice shall inform Class
6 Members that they need not do anything in order to receive an
7 Individual Settlement Payment and to keep the Settlement
8 Administrator apprised of their current mailing address, to which the
9 Individual Settlement Payments will be mailed following the
10 Funding Date. The Class Notice shall set forth the release to be given
11 by all members of the Class who do not request to be excluded from
12 the Settlement Class in exchange for an Individual Settlement
13 Payment, the number of Workweeks worked by each Class Member
14 during the Class Period, if any, and the estimated amount of their
15 Individual Settlement Payment if they do not request to be excluded
16 from the Settlement, if any. The Settlement Administrator shall use
17 the Class Data to determine Class Members’ Workweeks Pay
18 Periods.

19 b) The Notice Packet’s mailing envelope shall include the following
20 language: “IMPORTANT LEGAL DOCUMENT- YOU MAY BE
21 ENTITLED TO PARTICIPATE IN A CLASS ACTION
22 SETTLEMENT; A PROMPT REPLY TO CORRECT YOUR
23 ADDRESS IS REQUIRED AS EXPLAINED IN THE ENCLOSED
24 NOTICE.”

25 2. Notice by First Class U.S. Mail. Upon receipt of the Class Data, the
26 Settlement Administrator will perform a search based on the National
27 Change of Address Database to update and correct any known or identifiable
28 address changes. No later than twenty-one (21) days after preliminary

1 approval of the Settlement, the Settlement Administrator shall mail copies
2 of the Notice Packet to all Class Members via regular First-Class U.S. Mail,
3 and where available, by email and SMS text message. The Settlement
4 Administrator shall exercise its best judgment to determine the current
5 mailing address for each Class Member. The address identified by the
6 Settlement Administrator as the current mailing address shall be presumed
7 to be the best mailing address for each Class Member.

8 3. Undeliverable Notices. Any Notice Packets returned to the Settlement
9 Administrator as non-delivered on or before the Response Deadline shall be
10 re-mailed to any forwarding address provided within seven (7) days of
11 receiving the returned notice. If no forwarding address is provided, the
12 Settlement Administrator shall promptly attempt to determine a correct
13 address by lawful use of skip-tracing, or other search using the name, address
14 and/or Social Security number of the Class Member involved, and shall then
15 perform a re-mailing, if the Settlement Administrator identifies another
16 mailing address. In addition, if any Class Member who is currently
17 employed by Defendant, is returned to the Settlement Administrator, as non-
18 delivered and no forwarding address is provided, the Settlement
19 Administrator shall notify Defendant. Defendant will request that the
20 currently employed Class Member provide a corrected address and transmit
21 to the Settlement Administrator any corrected address provided by the Class
22 Member. Class Members who receive a re-mailed Notice Packet shall have
23 their Response Deadline extended fifteen (15) days from the original
24 Response Deadline.

25 4. Disputes Regarding Individual Settlement Payments. Class Members will
26 have the opportunity, should they disagree with Defendant's records
27 regarding the start and end dates of employment, to provide documentation
28 and/or an explanation to show contrary dates. If there is a dispute, the

1 Settlement Administrator will consult with the Parties to determine whether
2 an adjustment is warranted. The Settlement Administrator shall determine
3 the eligibility for, and the amounts of, any Individual Settlement Payments
4 under the terms of this Agreement. The Settlement Administrator's
5 determination of the eligibility for and amount of any Individual Settlement
6 Payment shall be binding upon the Class Member and the Parties.

7 5. Disputes Regarding Administration of Settlement. Any disputes not
8 resolved by the Settlement Administrator concerning the administration of
9 the Settlement will be resolved by the Court under the laws of the State of
10 California. Before any such involvement of the Court, counsel for the Parties
11 will confer in good faith to resolve the disputes without the necessity of
12 involving the Court.

13 6. Exclusions. The Class Notice contained in the Notice Packet shall state that
14 Class Members who wish to exclude themselves from the Settlement must
15 submit a written request for exclusion by the Response Deadline. The
16 written request for exclusion must state that the Class Member wishes to
17 exclude himself or herself from the Settlement and (1) must contain the
18 name, address, and the last four digits of the Social Security number of the
19 person requesting exclusion; (2) must be signed by the Class Member; (3)
20 must be postmarked or fax stamped by the Response Deadline and returned
21 to the Settlement Administrator at the specified address or fax telephone
22 number; and (4) contain a typewritten or handwritten notice stating in
23 substance: "I wish to opt out of the settlement of the class action lawsuit
24 entitled *David Mejia v. SCRAM of California, Inc.*, currently pending in the
25 County of San Mateo Superior Court, Case No. 23-CIV-03702. I understand
26 that by requesting to be excluded from the settlement, I will receive no
27 money from the Settlement described in this Notice." The request for
28 exclusion will not be valid if it is not timely submitted, if the Class Member

1 does not sign it, or if it does not contain the name and address and last four
2 digits of the Social Security number of the Class Member. The date of the
3 postmark on the mailing envelope or fax stamp on the request for exclusion
4 shall be the exclusive means used to determine whether the request for
5 exclusion was timely submitted. Any Class Member who requests to be
6 excluded from the Settlement Class will not be entitled to an Individual
7 Settlement Payment and will not be otherwise bound by the terms of the
8 Settlement or have any right to object, appeal or comment thereon.
9 Settlement Class Members shall be bound by all terms of the Settlement and
10 any final judgment entered in this Action if the Court approves the
11 Settlement. No later than fourteen (14) calendar days after the Response
12 Deadline, the Settlement Administrator shall provide counsel for the Parties
13 with a final list of the Settlement Class Members. At no time shall any of
14 the Parties or their counsel seek to solicit or otherwise encourage members
15 of the Class to submit requests for exclusion from the Settlement.

- 16 7. Objections. The Class Notice contained in the Notice Packet shall state that
17 Class Members who wish to object to the Settlement may submit to the
18 Settlement Administrator a written statement of objection (“Notice of
19 Objection”) by the Response Deadline, forty-five (45) days from the date of
20 mailing of the Notice, except if a Class member submits a written, signed
21 challenge to his/her Individual Settlement Amount, then fourteen (14) days
22 from the date the Claims Administrator mails an adjusted Individual
23 Settlement Notice or notice of rejection of the challenge. The postmark date
24 of mailing shall be deemed the exclusive means for determining that a Notice
25 of Objection was served timely. The Notice of Objection, if in writing, must
26 be signed by the Settlement Class Member and state: (1) the case name and
27 number; (2) the name of the Settlement Class Member; (3) the address of the
28 Settlement Class Member; (4) the last four digits of the Settlement Class

1 Member's Social Security number; (5) the basis for the objection; and (6) if
2 the Settlement Class Member intends to appear at the Final
3 Approval/Settlement Fairness Hearing. Settlement Class Members who fail
4 to make objections in writing in the manner specified above may still make
5 their objections orally at the Final Approval/Settlement Fairness Hearing
6 with the Court's permission. Settlement Class Members will have a right to
7 appear at the Final Approval/Settlement Fairness Hearing to have their
8 objections heard by the Court regardless of whether they submitted a written
9 objection. At no time shall any of the Parties or their counsel seek to solicit
10 or otherwise encourage Settlement Class Members to file or serve written
11 objections to the Settlement or appeal from the Order and Final Judgment.
12 Class Members who submit a written request for exclusion may not object
13 to the Settlement.

14 L. Funding and Allocation of the Gross Settlement Amount. Defendant is required to
15 pay the Gross Settlement Amount plus any employer's share of payroll taxes as
16 mandated by law within the time specified hereinabove on the Funding Date.

17 1. Calculation of Individual Settlement Payments. Individual Settlement
18 Payments shall be paid from the Net Settlement Amount and shall be paid
19 pursuant to the formula set forth herein. Using the Class Data, the Settlement
20 Administrator shall distribute the Net Settlement Amount based on the total
21 number of weeks worked by each Class Member during the Class Period
22 according to Defendant's records. Each Individual Settlement Payment will
23 be reduced by any legally mandated employee tax withholdings (e.g.,
24 employee payroll taxes, etc.). Individual Settlement Payments for Class
25 Members who submit valid and timely requests for exclusion will be
26 redistributed to Settlement Class Members who do not submit valid and
27 timely requests for exclusion on a pro rata basis based on their respective
28 Payment Ratios.

- 1 2. Allocation of Individual Settlement Payments. For tax purposes, Individual
2 Settlement Payments shall be allocated and treated as 20% wages (“Wage
3 Portion”) and 80% penalties (“Penalties and Interest Portion”). The Wage
4 Portion shall be reported on IRS Form W-2 and the Penalty and Interest
5 Portion shall be reported on IRS Form 1099.
- 6 3. No Credit Toward Benefit Plans. The Individual Settlement Payments made
7 to Settlement Class Members under this Settlement Agreement, as well as
8 any other payments made pursuant to this Settlement Agreement, will not be
9 utilized to calculate any additional benefits under any benefit plans to which
10 any Class Members may be eligible, including, but not limited to profit-
11 sharing plans, bonus plans, 401(k) plans, stock purchase plans, vacation
12 plans, sick leave plans, PTO plans, and any other benefit plan. Rather, it is
13 the Parties’ intention that this Settlement Agreement will not affect any
14 rights, contributions, or amounts to which any Class Members may be
15 entitled under any benefit plans.
- 16 4. All monies received by Plaintiff and the Settlement Class Members under the
17 Settlement which are attributable to wages shall constitute income to Plaintiff
18 and such Settlement Class Members solely in the year in which Plaintiff and
19 the Settlement Class Members receive such monies. It is the intent of the
20 Parties that Individual Settlement Payments provided for in this Settlement
21 agreement are the sole payments to be made by Defendant to Plaintiff, the
22 Settlement Class Members in connection with this Settlement Agreement and
23 that Plaintiff, the Settlement Class Members are not entitled to any new or
24 additional compensation or benefits as a result of having received the
25 Individual Settlement Payments.
- 26 5. Mailing. Individual Settlement Payments shall be mailed by regular First-
27 Class U.S. Mail to Settlement Class Members’ and/or Aggrieved
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1 Employees' last known mailing address no later than fifteen (15) days after
2 the Funding Date.

3 6. Expiration. Any checks issued to Settlement Class Members shall remain
4 valid and negotiable for one hundred and eighty (180) days from the date of
5 their issuance. If a Settlement Class Member does not cash his or her
6 settlement check within ninety (90) days, the Settlement Administrator will
7 send a letter to such persons, advising that the check will expire after the
8 180th day, and invite that Settlement Class Member to request reissuance in
9 the event the check was destroyed, lost, or misplaced. In the event an
10 Individual Settlement Payment check has not been cashed within one
11 hundred and eighty (180) days, all funds represented by such uncashed
12 checks, plus any interest accrued thereon, shall be paid to the California State
13 Controller, or if not feasible, to an approved cy pres recipient such as Legal
14 Aid at Work, in accordance with California Code of Civil Procedure section
15 384. The Parties agreed that under this procedure, there is no residue as the
16 entire Gross Settlement Amount will be distributed.

17 7. Service Award. In addition to the Individual Settlement Payment as a
18 Settlement Class Member, Plaintiff will apply to the Court for an award of
19 up to \$5,000.00, as the Service Award. Defendant will not oppose a Service
20 Award up to \$5,000.00 for Plaintiff. The Settlement Administrator shall pay
21 the Service Award, either in the amount stated herein if approved by the
22 Court or some other amount as approved by the Court, to Plaintiff from the
23 Gross Settlement Amount no later than fifteen (15) days after the Funding
24 Date. Any portion of the requested Service Award that is not awarded to the
25 Class Representative shall be part of the Net Settlement Amount and shall
26 be distributed to Settlement Class Members as provided in this Agreement.
27 The Settlement Administrator shall issue an IRS Form 1099 — MISC to
28 Plaintiff for his Service Award. Plaintiff shall be solely and legally

1 responsible to pay any and all applicable taxes on his Service Award and
2 shall hold harmless the Released Parties from any claim or liability for taxes,
3 penalties, or interest arising as a result of the Service Award. Approval of
4 this Settlement shall not be conditioned on Court approval of the requested
5 amount of the Service Award. If the Court reduces or does not approve the
6 requested Service Award, Plaintiff shall not have the right to revoke the
7 Settlement, and it will remain binding.

8 8. Class Counsel Award. Defendant understands, and will not oppose, a
9 motion for attorneys' fees not to exceed thirty-five percent (35%) of the
10 Gross Settlement Amount currently estimated to be \$35,000 **and** attorneys'
11 expenses supported by declaration not to exceed \$45,000. Any awarded
12 Class Counsel Award shall be paid from the Gross Settlement Amount. Any
13 portion of the requested attorneys' fees and/or attorneys' expenses that are
14 not awarded to Class Counsel shall be part of the Net Settlement Amount
15 and shall be distributed to Settlement Class Members as provided in this
16 Agreement. The Settlement Administrator shall allocate and pay the
17 attorneys' fees to Class Counsel from the Gross Settlement Amount no later
18 than fifteen (15) days after the Funding Date. Class Counsel shall be solely
19 and legally responsible to pay all applicable taxes on the payment made
20 pursuant to this paragraph. The Settlement Administrator shall issue an IRS
21 Form 1099 — MISC to Class Counsel for the payments made pursuant to
22 this paragraph. If the Court reduces or does not approve the requested
23 attorneys' fees, Plaintiff and Class Counsel shall not have the right to revoke
24 the Settlement, or to appeal such order, and the Settlement will remain
25 binding.

26 9. PAGA Dismissal. Parties agree that as part of the consideration of this
27 Settlement Agreement, within fifteen (15) days of final approval of the class
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1 settlement, Plaintiff will dismiss its PAGA case, Case No. 30-2023-
2 01341670-CU-OE-CXC without prejudice.

3 10. Settlement Administration Costs. The Settlement Administrator shall be
4 paid for the costs of administration of the Settlement from the Gross
5 Settlement Amount. The estimate of the Settlement Administration Costs is
6 \$7,500.00. The Settlement Administrator shall be paid the Settlement
7 Administration Costs no later than fifteen (15) days after the Funding Date.

8 M. Final Approval Motion. Defense Counsel and Defendant shall use best efforts to file
9 with the Court a Motion for Order Granting Final Approval and Entering Judgment,
10 within twenty-eight (28) days following the expiration of the Response Deadline,
11 which motion shall request final approval of the Settlement and a determination of
12 the amounts payable for the Service Award, the Class Counsel Award, and the
13 Settlement Administration Costs. Defendant will provide Plaintiff with a draft of
14 the Motion at least five (5) business days prior to the filing of the Motion to give
15 Plaintiff an opportunity to propose changes or additions to the Motion.

16 1. Declaration by Settlement Administrator. No later than five (5) days after
17 the Response Deadline, the Settlement Administrator shall submit a
18 declaration in support of Plaintiff's motion for final approval of this
19 Settlement detailing the number of Notice Packets mailed and re-mailed to
20 Class Members, the number of undeliverable Notice Packets, the number of
21 timely requests for exclusion, the full names of any Class Members who opt
22 out of the Settlement, the number of objections received, the amount of the
23 average, lowest, and highest Individual Settlement Payments, the amount of
24 the average, lowest, and highest Aggrieved Employee Payments, the
25 Settlement Administration Costs, and any other information as the Parties
26 mutually agree or the Court orders the Settlement Administrator to provide.

27 2. Final Approval Order and Judgment. Counsel for Defense shall present an
28 Order Granting Final Approval of Class Action Settlement to the Court for

1 its approval, and Judgment thereon, at the time Counsel for Defense files the
2 Motion for Final Approval.

3 O. Review of Motions for Preliminary and Final Approval. Counsel or Defense will
4 provide an opportunity for Class Counsel to review the Motions for Preliminary and
5 Final Approval, including the Order Granting Final Approval of Class Action
6 Settlement, and Judgment at least five (5) business days in advance of filing with the
7 Court. The Parties and their counsel will cooperate with each other and use their best
8 efforts to affect the Court's approval of the Motions for Preliminary and Final
9 Approval of the Settlement, and entry of Judgment.

10 P. Cooperation. The Parties and their counsel will cooperate with each other and use
11 their best efforts to implement the Settlement.

12 Q. Interim Stay of Proceedings. The Parties agree to stay all proceedings in the Action,
13 except such proceedings necessary to implement and complete the Settlement,
14 pending the Final Approval/Settlement Fairness Hearing to be conducted by the
15 Court.

16 R. Amendment or Modification. This Agreement may be amended or modified only by
17 a written instrument signed by counsel for all Parties or their successors-in-interest.

18 S. Entire Agreement. Except with respect to Plaintiff's individual settlement
19 agreement, described in paragraph "S" immediately above, this Agreement and any
20 attached Exhibit constitute the entire Agreement among these Parties, and no oral or
21 written representations, warranties or inducements have been made to any Party
22 concerning this Agreement or its Exhibit other than the representations, warranties
23 and covenants contained and memorialized in this Agreement and its Exhibit.

24 T. Authorization to Enter into Settlement Agreement. Counsel for all Parties warrant
25 and represent they are expressly authorized by the Parties whom they represent to
26 negotiate this Agreement and to take all appropriate actions required or permitted to
27 be taken by such Parties pursuant to this Agreement to effectuate its terms, and to
28 execute any other documents required to effectuate the terms of this Agreement. The

persons signing this Agreement on behalf of Defendant represents and warrants that he/she is authorized to sign this Agreement on behalf of Defendant. Plaintiff represents and warrants that he is authorized to sign this Agreement and that he has not assigned any claim, or part of a claim, covered by this Settlement to a third-party.

U. No Public Comment: The Parties and their counsel agree that they will not issue any press releases, initiate any contact with the press, respond to any press inquiry, or have any communication with the press about the fact, amount, or terms of the Settlement Agreement. Class Counsel further agrees not to use the Settlement Agreement or any of its terms for any marketing or promotional purposes. Nothing herein will restrict Class Counsel from including publicly available information regarding this settlement in future judicial submissions regarding Class Counsel's qualifications and experience. Further, Class Counsel will not include, reference, or use the Settlement Agreement for any marketing or promotional purposes, either before or after the Motion for Preliminary Approval is filed.

V. Binding on Successors and Assigns. This Agreement shall be binding upon, and inure to the benefit of, the successors or assigns of the Parties, as previously defined.

W. California Law Governs. All terms of this Agreement and the Exhibit and any disputes shall be governed by and interpreted according to the laws of the State of California.

X. Counterparts. This Agreement may be executed in one or more counterparts. All executed counterparts and each of them shall be deemed to be one and the same instrument provided that counsel for the Parties to this Agreement shall exchange among themselves copies or originals of the signed counterparts.

Y. This Settlement Is Fair, Adequate, and Reasonable. The Parties believe this Settlement is a fair, adequate, and reasonable settlement of this Action and have arrived at this Settlement after extensive arms-length negotiations, considering all relevant factors, present and potential.

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1 Z. Jurisdiction of the Court. The Parties agree that the Court shall retain jurisdiction
2 with respect to the interpretation, implementation, and enforcement of the terms of
3 this Agreement and all orders and judgments entered in connection therewith, and
4 the Parties and their counsel submit to the jurisdiction of the Court for purposes of
5 interpreting, implementing and enforcing the settlement and all orders and judgments
6 entered in connection with this Agreement.

7 AA. Invalidity of Any Provision. Before declaring any provision of this Agreement
8 invalid, the Court shall first attempt to construe the provisions valid to the fullest
9 extent possible consistent with applicable precedents so as to define all provisions of
10 this Agreement valid and enforceable.

11 BB. No Unalleged Claims. Except with respect to individual claims alleged by Plaintiff
12 and settled separately by an individual settlement agreement between the Parties
13 described in paragraph “S” above, Plaintiff and Class Counsel represent that they do
14 not currently intend to pursue any claims against the Released Parties, including, but
15 not limited to, any and all claims relating to or arising from Plaintiff’s employment
16 with Defendant, regardless of whether Class Counsel is currently aware of any facts
17 or legal theories upon which any claims or causes of action could be brought against
18 Released Parties, including those facts or legal theories alleged in the Operative
19 Complaint in this Action. The Parties further acknowledge, understand, and agree
20 that this representation is essential to the Agreement and that this Agreement would
21 not have been entered into were it not for this representation.

22 CC. Waiver of Certain Appeals. The Parties agree to waive appeals and to stipulate to
23 class certification for purposes of this settlement only.

24 DD. No Admissions by the Parties. Plaintiff has claimed and continues to claim that the
25 Released Class Claims and Dismissed PAGA Claims have merit and give rise to
26 liability on the part of Defendant. Defendant claims that the Released Class Claims
27 and Dismissed PAGA Claims have no merit and do not give rise to liability. This
28 Agreement is a compromise of disputed claims. Nothing contained in this Agreement

1 and no documents referred to and no action taken to carry out this Agreement may
2 be construed or used as an admission by or against the Defendant or Plaintiff or Class
3 Counsel as to the merits or lack thereof of the claims asserted. Other than as may be
4 specifically set forth herein, each Party shall be responsible for and shall bear their
5 own attorney's fees and costs.
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IT IS SO AGREED, FORM AND CONTENT, BY PLAINTIFF:

DATED: 01/27/2026


David Mejia (Jan 27, 2026 10:50:46 PST)

DAVID MEJIA

IT IS SO AGREED, FORM AND CONTENT, BY DEFENDANT:

DATED: _____

Defendant SCRAM OF CALIFORNIA, INC.

Printed Name

Title

IT IS SO AGREED AS TO FORM ONLY BY COUNSEL:

DATED: January 14, 2026

WEBB LAW GROUP

By: 
Lenden Webb, Class Counsel.

DATED: 1/27/26

**BLUMENTHAL NORDEHAUG BHOWMIK DE
BLOUW LLP**

By: 
Kyle Nordrehaug
Kyle Nordrehaug, Esq.
Attorneys for Plaintiff and the Settlement Class
Members

TENCERSHERMAN, LLP

DATED: December 24, 2025

By: 
Sam G. Sherman, Esq.
Attorneys for Defendant
SCRAM OF CALIFORNIA, INC.

1 IT IS SO AGREED, FORM AND CONTENT, BY PLAINTIFF:

2 DATED: _____

3 **DAVID MEJIA**

4 IT IS SO AGREED, FORM AND CONTENT, BY DEFENDANT:

7 DATED: January 8, 2026

8 
Defendant SCRAM OF CALIFORNIA, INC.

9 Joseph J. Savic
10 Printed Name

11 CFO
12 Title

13 IT IS SO AGREED AS TO FORM ONLY BY COUNSEL:

15 DATED: _____

WEBB LAW GROUP

16 By: _____
17 Lenden Webb, Class Counsel.

19 DATED: _____

**BLUMENTHAL NORDEHAUG BHOWMIK DE
20 BLOUW LLP**

21 By: _____
22 Shani O. Zakay, Esq.
23 Attorneys for Plaintiff and the Settlement Class
24 Members

25 DATED: December 24, 2025

TENCERSHERMAN, LLP

26 By: 
27 Sam G. Sherman, Esq.
28 Attorneys for Defendant
SCRAM OF CALIFORNIA, INC.

TENCERSHERMAN, LLP
12520 High Bluff Dr, Ste 230; San Diego, CA 92130
TEL: 858-408-6900; FAX: 858-754-1260

Mejia v. SCRAM OF CALIFORNIA, INC.
San Mateo County Superior Court
Case No. 23-CIV-03702

DECLARATION OF SERVICE

I, the undersigned, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the above-entitled action; my business address is 12520 High Bluff Drive, Suite 230, San Diego, California 92130. On February 2, 2026, I served the following:

1. STIPULATION OF SETTLEMENT OF CLASS AND PAGA ACTION CLAIMS AND RELEASE OF CLAIMS

☒ (BY ELECTRONIC MAIL – CCP § 1010.6(a)(6); CRC Rule 2.251) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused such documents described herein to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ (BY ELECTRONIC SERVICE VIA FIRST LEGAL) Based on court order or an agreement of the parties to accept service by electronic transmission or by e-filing a document with the court, I caused the above-entitled document(s) to be served through First Legal at <https://www.firstlegal.com/> addressed to all parties appearing on the electronic service list for the above-entitled case. The service transmission was reported as complete and a copy of the First Legal Receipt Page/Confirmation will be maintained with the original document(s) in this office.

on the following individuals:

Lenden F. Webb, Esq. Katherine E. Cervantes, Esq. WEBB LAW GROUP, APC 10509 Vista Sorrento Parkway, Suite 450 San Diego, CA 92121	Attorneys for Plaintiff DAVID MEJIA T: (619) 399-7700; F: (559) 821-4500 Email: LWebb@WebbLawGroup.com ; KCervantes@WebbLawGroup.com ; MEdgar@WebbLawGroup.com ; Service@WebbLawGroup.com
Norman B. Blumenthal Kyle R. Nordrehaug Aparajit Bhowmik Jeffrey S. Herman Sergio Julian Puche Trevor G. Moran BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP 2255 Calle Clara La Jolla, CA 92037	Attorneys for Plaintiff DAVID MEJIA T: (858) 551-1223; F: (858) 551-1232 Emails: norm@bamlawca.com ; kyle@bamlawca.com ; aj@bamlawca.com ; jeffrey@bamlawca.com ; sergiojulian@bamlawca.com ; trevor@bamlawca.com

I declare under the penalty of perjury under the laws of the State of California that the above is true and correct. Executed on February 2, 2026, at San Diego, California.

EXHIBIT A

NOTICE OF PENDENCY OF CLASS ACTION SETTLEMENT AND FINAL HEARING DATE

*(David Mejia v. SCRAM of California, Inc, Superior Court of California, County of San Mateo
Case No. 23-CIV-03702)*

**YOUR LEGAL RIGHTS MAY BE AFFECTED WHETHER YOU ACT OR DO NOT ACT. PLEASE
READ THIS NOTICE CAREFULLY.**

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
Do Nothing and Receive a Payment	To receive a cash payment from the Settlement, you do not have to do anything. You will receive compensation but lose rights to sue separately. If you do nothing, you will be considered a Settlement Class Member and will receive a proportionate share of the Settlement. You will be bound by the terms of the Settlement and also give up any rights to pursue a separate legal action against Defendant and/or any of the Released Parties, as defined below, for the same or similar legal claims as those alleged in this lawsuit, as detailed in the Released Class Claims in Section 4 below.
Exclude Yourself	If you wish to exclude yourself from the Settlement, you must send a written request for exclusion to the Settlement Administrator as provided below. If you request exclusion from the Class Settlement, you will not be a member of the Settlement Class, you will receive no money from the Settlement, and you will not be able to make an objection to the Settlement, whether in writing, orally, by appeal or otherwise. However, you will retain the right to file a separate legal action. Please be aware that there are time limits for you to file a separate legal action.
Object	You may write to the Court about why you believe the settlement should not be approved. If you believe the Settlement is unfair or you do not agree with the Settlement in any respect, you may object to the Settlement by submitting a written objection to the Settlement Administrator as explained below. You must remain a member of the Settlement Class to object to the Settlement. This means you cannot object to the Settlement if you also are asking to opt-out of the Settlement.

1. Why did I get this Notice?

A proposed class action settlement (the "Settlement") of this lawsuit (the "Action") pending in the Superior Court for the State of California, San Mateo County (the "Court") has been reached between Plaintiff David Mejia ("Plaintiff") and Defendant SCRAM of California, Inc. ("Defendant"). The Court has granted preliminary approval of the Settlement. **You may be entitled to receive money from this Settlement.**

You have received this Class Notice because you have been identified as a member of the Class, which is defined as:

All current and former non-exempt employees who worked for Defendant in California and paid in whole or in part as "SCRAM Agents" during the period beginning January 3, 2022, through the date the Court grants preliminary approval. ("Class Period")

This Class Notice explains the lawsuit, the Settlement, and your legal rights. It is important that you read this Notice carefully as your rights may be affected by the Settlement.

2. What is this class action lawsuit about?

On August 7, 2023, Plaintiff filed a Class Action complaint in the San Mateo Superior Court, Case No. 23-CIV-03702 ("Action"), alleging claims for: (1) Unfair Competition in Violation of Cal. Bus. & Prof. Code §17200 *et seq*; (2) Failure to Pay Minimum Wages in Violation of Cal. Lab. Code §§ 1194, 1197 & 1197.1; (3) Failure to Pay Overtime Wages in Violation of Cal. Lab. Code §§ 510; (4) Failure to Provide Required Meal Periods in Violation of Cal. Lab. Code §§ 226.7 & 512 and the Applicable IWC Wage Order; (5) Failure to Provide Required Rest Periods in Violation of Cal. Lab. Code §§ 226.7 & 512 and the Applicable IWC Wage Order; (6) Failure to Provide Accurate Itemized Statements in Violation of Cal. Lab. Code § 226; (7) Failure to Reimburse Employees for Required Expenses in Violation of Cal. Lab. Code § 2802; and (8) Failure to Pay Sick Wages in Violation of Cal. Lab. Code §§ 201-204, 233, 246.

Defendant expressly denies any liability or wrongdoing of any kind associated with the claims alleged in the Action, dispute any wages, damages and penalties claimed by the Class Representative are owed, and further contends that, for any purpose other than settlement, the Action is not appropriate for class or representative action treatment. Defendant contends, among other things, that at all times they complied with the law, including the California Unfair Competition law, the California Labor Code and the Industrial Welfare Commission Wage Orders.

On November 19, 2024, the Parties participated in a full day mediation with mediator Judge William C. Pate. At the conclusion of the full-day mediation, the Parties were unable to reach an agreement for settlement. After months of continued settlement negotiations, the parties ultimately arrived at a settlement. The Court granted preliminary approval of the Settlement on <<INSERT PRELIMINARY APPROVAL DATE>>. At that time, the Court also preliminarily approved the Plaintiff to serve as the Class Representative, and the law firms of Webb Law Group, APC and Blumenthal, Nordrehaug Bhowmik De Blouw LLP, to serve as Class Counsel.

3. What are the terms of the Settlement?

Gross Settlement Amount. Defendant has agreed to pay an "all in" amount of One Hundred Thousand Dollars and Zero Cents (\$100,000.00) (the "Gross Settlement Amount") to fund the settlement. The Gross Settlement Amount includes the payment of all Individual Settlement Payments, Settlement Administration Costs, Class Counsel Award, and Service Award.

After Judgment becomes Final, Defendant will fund the Gross Settlement Amount by depositing the money with the Settlement Administrator. "Final" means the date the Judgment is no longer subject to appeal, or if an appeal is filed, the date the appeal process is completed, and the Judgment is affirmed.

Amounts to be Paid from the Gross Settlement Amount. The Settlement provides for certain payments to be made from the Gross Settlement Amount, which will be subject to final Court approval, and which will be deducted from the Gross Settlement Amount before Individual Settlement Payments are made to Class Members, as follows:

- Settlement Administration Costs. Payment to the Settlement Administrator, estimated not to exceed \$7,500.00 for expenses, including expenses of sending this Notice, processing opt outs, and distributing Individual Settlement Payments.
- Class Counsel Award. Payment to Class Counsel of an award of attorneys' fees of no more than thirty-five percent (35%) of the Gross Settlement Amount (currently \$35,000) and actually incurred litigation expenses of up to Forty-five Thousand Dollars and Zero Cents (\$45,000.00) for all expenses incurred as documented in Class Counsel's billing records, both subject to Court approval. Class Counsel have been prosecuting the Action on behalf of Plaintiff and the Class on a contingency fee basis (that is, without being paid any money to date) and have been advancing all litigation costs and expenses.
- Service Award. A Service Award of up to Five Thousand Dollars and Zero Cents (\$5,000.00) to Plaintiff, or such lesser amount as may be approved by the Court, to compensate him for services on behalf of the Class in initiating and prosecuting the Action, and for the risks he undertook.
- PAGA Dismissal and Settlement Payment. Plaintiff will dismiss all PAGA claims alleged in the Representative Complaint, without prejudice, and the remaining \$7,500.00 will be distributed to Aggrieved Employees as the Aggrieved Employee Payment.
- Calculation of Payments to Settlement Class Members. After all the above payments of the court-approved Class Counsel Award, the Service Award, and the Settlement Administration Costs are deducted from the Gross Settlement Amount, the remaining portion, called the "Net Settlement Amount," shall be distributed to class members who do **not** request exclusion ("Settlement Class Members"). The Individual Settlement Payment for each Settlement Class Member will be calculated by dividing the Net Settlement Amount by the total number of workweeks for all Settlement Class Members that occurred during the Class Period and multiplying the result by each individual Settlement Class Member's workweeks that occurred during the Class Period. A "workweek" is defined as a normal seven-day week of work during the Class Period in which, according to Defendant's records, a member of the class worked at least one-day during any such workweek.

If the Court approves the Settlement, unless you opt out, you will automatically be mailed a check for your Individual Settlement Payment to the same address as this Class Notice. You do not have to do anything to receive a payment. If your address has changed, you must contact the Settlement Administrator to inform them of your correct address to ensure you receive your payment.

Tax Matters. Ten percent (10%) of each Individual Settlement Payment is allocated to wages. Taxes are withheld from this amount, and each Settlement Class Member will be issued an Internal Revenue Service Form W-2 for such payment. Ninety percent (90%) of each Individual Settlement Payment is allocated to penalties and pre-judgment interest ("Penalty and Interest Portion"). Each Settlement Class Member will be issued an Internal Revenue Service Form 1099 for Penalty Portion and Interest Portion of the Individual Settlement Payments. Neither Class Counsel nor Defendant's counsel intend anything contained in this Settlement to constitute advice

regarding taxes or taxability. You may wish to consult a tax advisor concerning the tax consequences of the payments received under the Settlement.

No Credit Toward Benefit Plans. The Individual Settlement Payments and Aggrieved Employee Payments made to Settlement Class Members under this Settlement Agreement, as well as any other payments made pursuant to this Settlement Agreement, will not be utilized to calculate any additional benefits under any benefit plans to which any Class Members may be eligible, including, but not limited to profit-sharing plans, bonus plans, 401(k) plans, stock purchase 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 Class Members may be entitled under any benefit plans.

Conditions of Settlement. This Settlement is conditioned upon the Court entering an order granting final approval of the Settlement and entering judgment.

4. What Do I Release Under the Settlement?

Released Claims. As of the Effective Date and funding in full of the Gross Settlement Amount by Defendant, Plaintiff and the Settlement Class Members shall release all Released Class Claims that occurred during the Class Period as to the Released Parties. Released Class Claims means all class claims alleged, or reasonably could have been alleged, in the Operative Complaint in the Action which occurred during the Class Period, and expressly excluding all other claims including claims for vested benefits, wrongful termination, unemployment insurance, disability, social security, workers' compensation, and class claims outside the Class Period

This means that, if you do not timely and formally exclude yourself from the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against Defendant about the legal issues resolved by this Settlement. It also means that all of the Court's orders in this Action will apply to you and legally bind you.

5. How much will my payment be?

Defendant's records reflect that you have << ____ >> Workweeks worked during the Class Period (February 14, 2019, through June 7, 2025).

Based on this information, your estimated Individual Settlement Payment is << _____ >>.

Defendant's records reflect that you have << ____ >> Pay Periods worked during the PAGA Period (January 3, 2022, through the date the Court grants preliminary approval).

Based on this information, your estimated Aggrieved Employee Payment is << _____ >>.

If you wish to challenge the information set forth above, then you must submit a written, signed dispute challenging the information along with supporting documents, to the Settlement Administrator at the address provided in this Notice no later than _____ [forty-five (45) days after the Notice or fifteen (15) days after the re-mailed Notice].

6. How can I get a payment?

To get money from the settlement, you do not have to do anything. A check for your settlement payment will be mailed automatically to the same address as this Notice. If your address is incorrect or has changed, you must notify the Settlement Administrator. The Settlement Administrator is: Apex Class Action LLC.

The Court will hold a hearing on _____ to decide whether to finally approve the Settlement. If the Court approves the Settlement and there are no objections or appeals, payments will be mailed within a few months after this hearing. If there are objections or appeals, resolving them can take time, perhaps more than a year. Please be patient. After entry of the Judgment, the Settlement Administrator will provide notice of the final judgment to the Class Members by posting a copy of the Judgment on the administrator's website at www._____.com.

7. What if I don't want to be a part of the Settlement?

If you do not wish to participate in the Settlement, you may exclude yourself from the Settlement or "opt out." **If you opt out, you will receive NO money from the Settlement, and you will not be bound by its terms, except as provided as follows.** Please be aware that there will be a time limit to bring your claims in a separate action, which may expire if the action is not filed within that time limit.

To opt out, you must submit to the Settlement Administrator, by First Class Mail, a written, signed and dated request for exclusion postmarked no later than _____. The address for the Settlement Administrator is Apex Class Action, LLC, P.O. Box 54668, Irvine, CA 92619; Tel: (800) 355-0700. The request for exclusion must state in substance that the Class Member has read the Class Notice and that he or she wishes to be excluded from the settlement of the class action lawsuit entitled *David Mejia v. SCRAM of California, Inc.*, currently pending in San Mateo County, Case No. 23-CIV-03702. The request for exclusion must contain your name, address, signature and the last four digits of your Social Security Number for verification purposes. The request for exclusion must be signed by you. No other person may opt out for a member of the Class.

Written requests for exclusion that are postmarked after _____, or are incomplete or unsigned will be rejected, and those Class Members will remain bound by the Settlement and the release described above.

8. How do I tell the Court that I would like to challenge the Settlement?

Any Class Member who has not opted out and believes that the Settlement should not be finally approved by the Court for any reason, may object to the proposed Settlement. Objections may be in writing and state the Class Member's name, current address, telephone number, and describe why you believe the Settlement is unfair and whether you intend to appear at the final approval hearing. All written objections or other correspondence must also state the name and number of the case, which is ***David Mejia v. SCRAM of California, Inc., San Mateo County, Case No. 23-CIV-03702***. You may also object without submitting a written objection by appearing at the final approval hearing scheduled as described in Section 9 below.

To object to the Settlement, you cannot opt out. If the Court approves the Settlement, you will be bound by the terms of the Settlement in the same way as Class Members who do not object. Any Class Member who does not object in the manner provided in this Class Notice shall have waived any objection to the Settlement, whether by appeal or otherwise.

Written objections must be delivered or mailed to the Settlement Administrator no later than _____. The address for the Settlement Administrator is Apex Class Action, LLC, P.O. Box 54668, Irvine, CA 92619; Tel: (800) 355-0700.

The addresses for the Parties' counsel are as follows:

Class Counsel:
Lenden F. Webb.
Webb Law Group

10509 Vista Sorrento Parkway, Suite 450
San Diego, CA 92121
Tel.: (619) 399-7700
E-Mail: lwebb@webblawgroup.com

Counsel for Defendant:

Sam G. Sherman, Esq.
TencerSherman, LLP
12520 High Bluff Drive, Suite 230
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Tel: (858) 408-6900
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Class Counsel:

Norman B. Blumenthal
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9. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing at 00:00 AM/PM on _____, at the San Mateo Superior Court, Central Division, Department 11, located at 800 N. Humboldt Street, San Mateo, CA 94401, before Judge Nina Shapirshteyn. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The purpose of this hearing is for the Court to determine whether to grant final approval to the Settlement. If there are objections, the Court will consider them. The Court will listen to people who have made a timely written request to speak at the hearing or who appear at the hearing to object. This hearing may be rescheduled by the Court without further notice to you. **You are not required to attend** the Final Approval Hearing, although any Class Member is welcome to attend the hearing.

10. How do I get more information about the Settlement?

You may call the Settlement Administrator at 1-800-355-0700 or write to **David Mejia v. SCRAM of California, Inc., San Mateo Superior Court, Case No. 23-CIV-03702**, Settlement Administrator, Apex Class Action, LLC, P.O. Box 54668, Irvine, CA 92619 c/o Apex Class Action LLC.

This notice summarizes the proposed settlement. More details are in the Settlement Agreement. You may receive a copy of the Settlement Agreement, the Final Judgment or other Settlement documents by writing to Webb Law Group, 10509 Vista Sorrento Parkway, Suite 450 San Diego, CA 92121 or by visiting the administrator's website at www._____.com.

PLEASE DO NOT CALL THE COURT ABOUT THIS NOTICE.

IMPORTANT:

- You must inform the Settlement Administrator of any change of address to ensure receipt of your settlement payment.
- Settlement checks will be null and void 180 days after issuance if not deposited or cashed. In such event, the Settlement Administrator shall pay all funds from such uncashed checks will be paid to the Community Law Project, a Cy Pres, in accordance with California Code of Civil Procedure section 384. If your check is lost or misplaced, you should contact the Settlement Administrator immediately to request a replacement.

EXHIBIT 2



Quotation Request:
Karla Roman
Webb Law Group, APC
kroman@webblawgroup.com
619.399.7700

Case Name: David Mejia v. Scram of California, Inc.
Date: Monday, May 25, 2026
RFP Number: 30477281

Prepared By:
Sean Hartranft
Apex Class Action LLC
Sean@apexclassaction.com
949.878.3676

Settlement Specifications	
Estimated Class Size:	101
Certified Language Translation:	Yes
Static Settlement Website	No
Percentage of Undeliverable Mail	20%

Professional Services	Fee Calculation	Rate(s)	Quantity	Estimated Cost
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Data Analytics and Standardization				
Import and Standardize Data*	Per Hour	\$125.00	1	\$125.00
Data Analyst	Per Hour	\$150.00	2	\$300.00
*Data provided must be in a workable format. Apex can standardize provided data at an additional cost of \$150/hr.				
			Sub Total:	\$425.00

Mailing of Class Notice				
Form Set Up	Per Hour	\$120.00	1	\$120.00
Print & Mail Class Notice	Per Piece	\$1.50	101	\$151.50
USPS First Class Postage	Per Piece	\$0.78	101	\$78.78
Remail Undeliverable Mail (Skip-Trace)	Per Piece	\$2.25	20	\$45.45
Receive and Process Undeliverable Mail	Per Hour	\$75.00	1	\$75.00
Process Class Member Correspondence via mail, e-mail & fax	Per Hour	\$75.00	1	\$75.00
NCOA Address Update (USPS)	Static Rate	\$51.26	1	\$51.26
Certified Language Translation: Spanish	Static Rate	\$1,000.00	1	\$1,000.00
			Sub Total:	\$1,596.99

Project Management				
Project Management	Per Hour	\$150.00	2	\$300.00
Project Coordinator	Per Hour	\$90.00	2	\$180.00
Data Analyst and Reporting	Per Hour	\$140.00	1	\$140.00
			Sub Total:	\$620.00



Professional Services	Fee Calculation	Rate(s)	Quantity	Estimated Cost
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Toll-Free Contact Center, Website & Reporting				
Bilingual Toll-Free Contact Center	Static Rate	\$50.00	1	\$50.00
Settlement Status Reports	Static Rate	\$750.00	1	Waived
Sub Total:				\$50.00

Distribution & Settlement Fund Management				
Settlement Calculations (Preliminary and Final)	Per Hour	\$120.00	2	\$240.00
Account Management and Reconciliation	Per Hour	\$140.00	2	\$280.00
Print & Mail Distribution Settlement Check (W-2/1099)	Per Piece	\$1.50	101	\$151.50
USPS First Class Postage	Per Piece	\$0.78	101	\$78.78
Remail Distribution to Updated Address (Skip Trace)	Per Piece	\$2.25	10	\$22.73
Individual Income Tax Preparation & Reporting	Per Hour	\$100.00	3	\$300.00
QSF Income Tax Reporting (per calendar year)	Per Year	\$750.00	1	\$750.00
Sub Total:				\$1,823.01

Post Distribution Reconciliation				
Bank Account Reconciliation	Per Hour	\$135.00	1	\$135.00
Project Management Reconciliation	Per Hour	\$100.00	1	\$100.00
Declarations	Per Hour	\$120.00	2	\$240.00
Sub Total:				\$475.00

			WILL NOT EXCEED:	\$4,990.00
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Thank you for your business!



Terms & Conditions

The following Terms and Conditions govern the provision of all services to be provided by Apex Class Action and its affiliates ("Apex") to the Client. These terms and conditions are binding and shall apply to all services provided by Apex in relation to any related services or products.

1. **Services:** Apex commits to providing the Client with the administrative services detailed in the attached Proposal (the "Services").

2. **Payment Terms:** As compensation for the legal services to be provided, the Client agrees to pay Apex all fees detailed in the Proposal. The fees quoted in the Proposal (and any subsequent proposals for additional services) are estimates based on the information provided to Apex by the Client. Apex makes no representation that the estimated fees in the Proposal or any subsequent proposals for additional services shall equal the actual fees charged by Apex to the Client, which fees (including individual line items) may be greater or less than estimated. If additional services are requested on an hourly basis and are not specifically detailed in the Proposal, Apex will prepare estimates for such services subject to approval by the Client. In the performance of such additional services, Apex will charge standard hourly fees which shall apply.

3. **Incurred Expenses:** In relation to the provision of services outlined in this agreement, the Client agrees to reimburse Apex for all reasonable out-of-pocket expenses incurred. Such expenses may include, but are not limited to, costs associated with postage, media production or publication, banking fees, brokerage fees, messenger and delivery service expenses, travel expenses, filing fees, office supplies, meals, staff overtime expenses, and other related costs and expenses. If not otherwise specified in writing, fees for print notice and certain expenses, such as media publication and postage, must be paid immediately upon invoicing and, in certain cases, at least ten (10) days prior to the date on which such expenses will be incurred.

4. **Invoicing:** Apex shall present invoices for its fees and expenses on a monthly basis, except as provided in Section 3. The Client agrees to pay each invoice within 30 days of receipt. In case of non-payment within 90 days of the billing date, an additional service charge of 1.5% per month may apply. Apex reserves the right to increase its prices, charges, and rates annually, subject to reasonable adjustments. If any price increases exceed 10%, Apex shall give thirty (30) days' notice to the Client. In the event of any unpaid invoices beyond 120 days of the due date, Apex reserves the right to withhold services and reports until payment is received, subject to notice to the Client. It is important to note that Apex's failure to provide services and reports in such instances shall not constitute a default under this agreement.

5. **Case Duration:** The duration of these Terms and Conditions, except for the data storage obligations, shall be in effect until 30 days following the completion of the Services as described in the Proposal. The parties may extend these Terms and Conditions in writing for a mutually agreed-upon period beyond this initial 30-day period.

6. **Termination of Services:** Either party may terminate the Services by providing thirty (30) days written notice to the other party. Alternatively, termination may occur immediately upon written notice for Cause, as defined below. Cause means (i) Apex's gross negligence or willful misconduct that causes serious and material harm to the Client; (ii) the Client's failure to pay Apex invoices for more than one hundred twenty (120) days from the date of the invoice; or (iii) the accrual of invoices or unpaid services where Apex reasonably believes it will not be paid. Termination of the Services shall not relieve the Client of its obligation to pay Apex for services rendered prior to the termination.

7. **Independent Contractor:** As an independent contractor, Apex will provide services under the terms of this agreement. It is agreed that neither Apex nor any of its employees will be considered an employee of the Client. Consequently, Apex and its employees will not be eligible for any benefits provided by the Client to its employees. The Client will not make any tax deductions from the payments due to Apex for state or federal tax purposes. Apex will be solely responsible for paying all taxes and other payments due on payments received from the Client under this agreement.

8. **Apex warrants that the Services outlined in the Proposal will be performed in accordance with the standards generally adhered to by professionals providing similar services. It is acknowledged that the Services may entail the likelihood of some human and machine errors, omissions, delays, and losses that may result in damage. However, Apex shall not be held liable for such errors, omissions, delays, or losses unless they are caused by its gross negligence or willful misconduct. In the event of any breach of this warranty by Apex, the Client's sole remedy will be limited to Apex's rerunning, at its expense, any inaccurate output provided that such inaccuracies occurred solely as a result of Apex's gross negligence or willful misconduct under this agreement.**

9. **Limitation of Liability:** The Client acknowledges that Apex shall not be held liable for any consequential, special, or incidental damages incurred by the Client in relation to the performance of Services, whether the claim is based on breach of warranty, contract, tort (including negligence), strict liability, or any other grounds. Under no circumstances shall Apex's liability to the Client, for any Losses (including court costs and reasonable attorney's fees), arising out of or in connection with these Terms and Conditions, exceed the total amount charged or chargeable to the Client for the specific service(s) that caused the Losses.

10. **Indemnification:** The Client agrees to indemnify and hold harmless Apex from any losses, suits, actions, judgments, fines, costs, liabilities, or claims arising from any action or proceeding relating to the Services provided by Apex, regardless of whether or not it results in liability (collectively referred to as "Indemnified Claims"). However, this indemnification provision shall not apply to the extent that such Indemnified Claims are caused by Apex's willful misconduct, gross negligence, or breach of these Terms and Conditions. This provision shall survive termination of the Services.

11. **Confidentiality:** Apex will uphold strict confidentiality between Apex and the Client and applies to all non-public records, documents, systems, procedures, processes, software, and other information received by either party in connection with the performance of services under these terms. Both Apex and the Client agree to keep confidential all such non-public information, including any material marked or identified as confidential or proprietary. Any such confidential information shall not be disclosed, provided, disseminated, or otherwise made available to any third party, except as required to fulfill the parties' obligations under these terms. The parties acknowledge that in the event of any request to disclose any confidential information in connection with a legal or administrative proceeding, or otherwise to comply with a legal requirement, prompt notice of such request must be given to the other party to enable that party to seek an appropriate protective order or other remedy or to waive compliance with the relevant provisions of these terms. If the Client seeks a protective order or another remedy, Apex, at the Client's expense, will cooperate with and assist the Client in such efforts. If the Client fails to obtain a protective order or waives compliance with the relevant provisions of these terms, Apex will disclose only that portion of the confidential information that it determines it is required to disclose. This confidentiality provision shall survive termination of the services provided. Both parties acknowledge and agree that any breach of this these terms may cause irreparable harm to the non-breaching party and that injunctive relief may be necessary to prevent any actual or threatened breach. The terms set forth between the parties supersede all prior negotiations, understandings, and agreements between the parties concerning confidentiality. These terms may only be amended in writing and signed by both parties.

12. **Ownership of the programs, system data, and materials provided by Apex to the Client during the course of providing services herein shall solely belong to Apex. It is acknowledged that fees and expenses paid by the Client do not confer any rights in such property. It is also understood that the said property is made available to the Client solely for the purpose of using it during and in connection with the services provided by Apex.**

13. **Apex may derive financial benefits from financial institutions in connection with the deposit and investment of funds with such institutions, including without limitation, discounts on eligible banking services and fees, and loans at favorable rates.**

14. **COMPLETE AGREEMENT.** These Terms and Conditions, along with the attached Proposal, represent the complete agreement and understanding between the parties and override any prior agreements (whether written or oral) between Apex and the Client regarding the subject matter. Any modification to these Terms and Conditions may only be made in writing and must be signed by both Apex and the Client. The headings in this document are included for convenience only and do not alter or restrict any provisions in these Terms and Conditions. They may not be used in the interpretation of these Terms and Conditions.

15. **This provision outlines the requirements for providing notice or other communication under this agreement. All such communications must be in writing and can be delivered either by personal delivery or through U.S. Mail with prepaid postage or overnight courier. Once delivered personally or sent through the mail, the notice will be considered given after five (5) days from the deposit date in the U.S. Mail. Alternatively, if sent through an overnight courier, the notice will be considered given one business day after delivery to the such courier. It's important to note that the notice must be provided to a responsible officer or principal of the Client or Apex, depending on the case.**

16. **Force Majeure:** In the event of any failure or delay in performance due to circumstances beyond Apex's control, including but not limited to strikes, lockouts, fires, floods, acts of God or public enemy, riots, civil disorders, insurrections, war or war conditions, or interference by civil or military authorities, Apex shall not be held liable for any resulting loss or damage. The time for performance under this agreement shall be extended for a period equal to the duration of the disabling cause and a reasonable time thereafter. This provision shall constitute a force majeure clause and shall be construed accordingly.

17. **The applicable state and federal laws shall govern the interpretation and enforcement of these Terms and Conditions. No choice of law or conflict of laws provisions shall affect this governing law provision.**

18. **Severability:** This applies to all clauses and covenants contained within these Terms and Conditions. In the event that any clause or covenant is deemed invalid, illegal, or unenforceable, the remaining provisions shall remain valid and enforceable to the fullest extent permissible by law. The validity, legality, and enforceability of the remaining provisions shall in no way be affected or impaired by the invalidity, illegality, or unenforceability of any provision deemed so.

19. **Nonwaiver:** This applies to these Terms and Conditions. This means that any failure by one party to enforce a provision of these terms on one or more occasions shall not be construed as a waiver of that provision. In other words, any failure to enforce a provision does not give up the right to enforce it in the future. All provisions of these Terms and Conditions remain in full force and effect, regardless of any prior failure to enforce them.

EXHIBIT 3

Activities Export

05/26/2026

7:13 AM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/26/2025	\$	Print 333 double sided pages of client and opposing documents for client deposition preparation binder. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	167.00	\$0.20	-	\$33.40
03/26/2025	\$	Print 186 pages of responses to Opposing Party discovery requests. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$0.20	-	\$0.20
03/26/2025	\$	Shipment of Client Documents and Preparation for Deposition Binders via UPS. Tracking Number: 1Z 902 R14 03 9236 5067 ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Romina Machicao	1.00	\$23.72	-	\$23.72
04/08/2025	\$	TLO fee for soft background report on potential witness Blake Xavier. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/08/2025	\$	TLO fee for soft background report on potential witness Valerie Williams. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/08/2025	\$	TLO fee for soft background report on potential witness Aaron Wade. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/08/2025	\$	TLO fee for soft background report on potential witness Sean Viray. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
							\$0.00 0.00h	\$563.35 0.00h

Activities Export

05/26/2026

7:13 AM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/08/2025	\$	TLO fee for soft background report on potential witness Garrett Valencia. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/08/2025	\$	TLO fee for soft background report on potential witness Lara Stoeckenius. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/08/2025	\$	TLO fee for soft background report on potential witness Ashley Riker. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/08/2025	\$	TLO fee for soft background report on potential witness Kim Mattison. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/08/2025	\$	TLO fee for soft background report on potential witness Matthew Lema. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/08/2025	\$	TLO fee for soft background report on potential witness Noah Leather. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/08/2025	\$	TLO fee for soft background report on potential witness Vanessa Fayad. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/08/2025	\$	TLO fee for soft background report on potential witness Tawny Blumhagen.	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
							\$0.00 0.00h	\$563.35 0.00h

Activities Export

05/26/2026

7:13 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
04/17/2025	\$	OneLegal fee for e-filing of Joint Case Management Conference with Orange Superior Court. 25179611 ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$15.75	-	\$15.75
04/23/2025	\$	TLO fee for soft background report on potential witness Clinton Crabtree. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/23/2025	\$	TLO fee for soft background report on potential witness Taylor King. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/23/2025	\$	TLO fee for soft background report on potential witness Royce McDonald. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$25.00	-	\$25.00
04/23/2025	\$	OneLegal fee for e-filing of Joint Case Management Conference Statement with San Mateo Superior Court. 25219165 ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Karla Roman	1.00	\$21.88	-	\$21.88
05/09/2025	\$	TLO soft background reports for Hayden Segovia Nepomuceno and Aaron Schuyler Rhodes. ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Jocelyn Arteaga	2.00	\$25.00	-	\$50.00
05/30/2025	\$	Purchase Orange County Superior Court Case Management	04289 - SCRAM - SCRAM SCRAM	Morgan Edgar	1.00	\$7.50	-	\$7.50
							\$0.00 0.00h	\$563.35 0.00h

Activities Export

05/26/2026
7:13 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Conference Minute Order dated April 24, 2025. ● Unbilled						
10/22/2025	\$	CA: File To Existing - #31737035 - David Mejia v Scram of California, Inc.: Case Management Statement (1 filing) ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Jocelyn Arteaga	1.00	\$16.95	-	\$16.95
02/02/2026	\$	CA: File To Existing - #11617971 - David Mejia v Scram of California, Inc.: Case Management Statement (1 filing) ● Unbilled	04289 - SCRAM - SCRAM SCRAM	Jocelyn Arteaga	1.00	\$18.95	-	\$18.95
							\$0.00 0.00h	\$563.35 0.00h

EXHIBIT 4

Date	Hours	Description	Rate (\$)	Billable (\$)	User	
12/2/24	0.1	(Scram) Receipt and review of email correspondence regarding new referral class action case relating to wage and hour employment violations.	225	22.5	Morgan Edgar	
12/3/24	0.3	(SCRAM) Draft internal memo to file regarding new client checklist. Create client folders.	125	37.5	Jocelyn Arteaga	
12/3/24	0.1	Receipt and review of Association of Counsel and Joint Prosecution Agreement from Co-Counsel. Confirm contents are agreeable, and request PDF copy to be circulated for execution.	675	67.5	Lenden Webb	
12/3/24	0.2	(Scram) Receipt and review of interoffice email regarding possible class action lawsuit referral.	425	85	Raza Khan	
12/5/24	0.1	Receipt and review of internal memo from Case Staffer regarding scheduling Zoom meeting with Co-Counsel to obtain procedural history of the case and case status.	225	22.5	Morgan Edgar	
12/5/24	0.2	Draft internal memo to set up co-counsel zoom conference to get further information regarding case.	450	90	Katherine Cervantes	
12/9/24	0.1	Receipt and review of email correspondence from co-counsel regarding JPA, review response regarding same.	450	45	Katherine Cervantes	
12/9/24	0.2	Draft email correspondence to Co-Counsel regarding upcoming Case Management Conference hearing in San Mateo Superior Court and request for Zoom meeting.	225	45	Morgan Edgar	
12/9/24	0.2	Receipt and review of New Client Checklist.	450	90	Katherine Cervantes	
12/10/24	0.1	Draft email correspondence confirming new date and time of scheduled meeting with Co-Counsel to discuss case facts and procedural status in advance of upcoming Case Management Conference hearing.	225	22.5	Morgan Edgar	
12/11/24	0.1	Receipt and review of email correspondence from Co-Counsel regarding action to prepare draft of Notice of Association of Counsel.	225	22.5	Morgan Edgar	
12/11/24	0.2	Receipt and review of email correspondence from co-counsel regarding action to send notice of association of counsel.	450	90	Katherine Cervantes	
12/12/24	0.1	Draft of email correspondence to Co-Counsel regarding request for all case files to be sent via email correspondence to service email.	675	67.5	Lenden Webb	
12/12/24	0.4	Zoom meeting with Co-Counsel regarding procedural status of case, discovery, mediation, and potential settlement.	225	90	Morgan Edgar	
12/12/24	0.2	Receipt and review of email correspondence from co-counsel regarding box link and draft response regarding same.	450	90	Katherine Cervantes	
12/12/24	0.6	Receipt and review of client box file received from Opposing Counsel.	225	135	Morgan Edgar	
12/12/24	0.9	Prepare draft of Notice of Association of Counsel. Subsequently draft email correspondence to Co-Counsel circulating fully executed Joint Prosecution Agreement and Notice of Association of Counsel for signature and subsequent filing.	225	202.5	Morgan Edgar	
12/13/24	0.1	Office Conference between Paralegal MYE and Legal Assistant JRW regarding best practice to re-name, bates number, and organize defendant's client documents within client folder.	135	13.5	Jack Wislar	
12/13/24	0.1	Office conference between Paralegal MYE and Legal Assistant JRW regarding file-saving and organizing Box file and action to provide Paraguay instructions for filing saving.	135	13.5	Jack Wislar	
12/13/24	0.1	Office Conference between Paralegal MYE and Legal Assistant JRW regarding which name to put in front of Bates Numbers for case staff review.	135	13.5	Jack Wislar	
12/13/24	0.1	Office conference between Paralegal MYE and Legal Assistant KJR regarding steps to contact potential witnesses and draft witness questionnaire.	150	15	Karla Roman	
12/13/24	0.1	Office conference between Paralegal MYE and Legal Assistant KJR regarding steps to contact potential witnesses and draft witness questionnaire.	225	22.5	Morgan Edgar	
12/13/24	0.1	Office conference between Paralegal MYE and Legal Assistant JRW regarding file-saving and organizing Box file and action to provide Paraguay instructions for filing saving.	225	22.5	Morgan Edgar	
12/13/24	0.1	Office Conference between Paralegal MYE and Legal Assistant JRW regarding which name to put in front of Bates Numbers for case staff review.	225	22.5	Morgan Edgar	
12/13/24	0.2	Review of Opposing Docs folder. Office conference between Legal Assistant JRW and Legal Assistant KJR regarding action steps to delegate file saving the same.	135	27	Jack Wislar	
12/13/24	0.2	Review of Opposing Docs folder. Office conference between Legal Assistant JRW and Legal Assistant KJR regarding action steps to delegate file saving the same.	150	30	Karla Roman	
12/13/24	0.2	Draft email correspondence to Co-Counsel regarding upcoming deadlines and extensions of time for discovery responses and motion to compel.	225	45	Morgan Edgar	
12/13/24	0.3	Receipt and review of multiple email correspondences from Co-Counsel regarding Motion to Compel deadlines and preparing draft of Notice of Association of Counsel for the PAGA matter.	225	67.5	Morgan Edgar	

12/16/24	0.1	Draft internal memo to case staff regarding file-save done by Office Assistant LFG.	135	13.5	Jack Wislar	
12/16/24	0.1	Receipt and review of internal memo from Case Staffer to Co-Counsel regarding meet and confer for motion to compel responses to Request for Production of Documents and Special Interrogatories.	225	22.5	Morgan Edgar	
12/16/24	0.2	Receipt and review of email correspondence from Co-Counsel confirming scheduled set date and time for Zoom meeting regarding upcoming Motion to Compel deadlines, subsequently generate Zoom meeting link and draft email correspondence to Co-Counsel regarding the same.	225	45	Morgan Edgar	
12/16/24	0.2	Zoom conference between Attorney KEC, Co-Counsel, and Paralegal MYE regarding Motion to Compel deadlines for both the PAGA and class matters.	225	45	Morgan Edgar	
12/16/24	0.3	Draft Notice of Association of Counsel for PAGA matter. Subsequently draft email correspondence to Co-Counsel regarding the same.	225	67.5	Morgan Edgar	
12/16/24	0.5	Organize PAGA folder into Pleadings, Client Docs & Opposing Docs, Correspondence, Discovery, Payments, costs, invoices. Upload opposing documents to Client & Opposing docs folder.	135	67.5	Jack Wislar	
12/16/24	0.2	Receipt and review of email correspondence from co-counsel regarding outstanding discovery and potential motion to compel deadlines.	450	90	Katherine Cervantes	
12/16/24	0.2	Zoom conference between Attorney KEC, Co-Counsel, and Paralegal MYE regarding Motion to Compel deadlines for both the PAGA and class matters.	450	90	Katherine Cervantes	
12/16/24	0.2	Receipt and review of email correspondence from co-counsel, action to review discovery responses, and draft response regarding same.	450	90	Katherine Cervantes	
12/16/24	0.3	Draft email correspondence to co-counsel regarding defendants discovery responses and action plan.	450	135	Katherine Cervantes	
12/16/24	1.6	Draft discovery response meet and confer outline of issues to co-counsel.	450	720	Katherine Cervantes	
12/16/24	2.1	Review of Defendants Discovery Responses and supplemental discovery responses to	450	945	Katherine Cervantes	
12/17/24	0.1	Office Conference between Legal Assistant KJR and Legal Assistant JRW with action to create new instructions for file savers in Paraguay for new production of documents.	150	15	Karla Roman	
12/17/24	0.1	Office conference between Attorney LFW, Attorney KEC and Paralegal MYE regarding upcoming Motion to Compel deadlines for Defendant's inadequate discovery responses in both the PAGA and class matters.	225	22.5	Morgan Edgar	
12/17/24	0.1	Draft internal memo to Case Staffer confirming correct file-saving name for client documents.	225	22.5	Morgan Edgar	
12/17/24	0.1	(PAGA) Receipt and review of Co-Counsel email correspondence regarding Defendant's potential discovery inadequacies to prepare draft of email correspondence to Opposing Counsel.	225	22.5	Morgan Edgar	
12/17/24	0.1	(PAGA) Receipt and review of prepared email correspondence to Co-Counsel regarding Motion to Compel deadline.	225	22.5	Morgan Edgar	
12/17/24	0.1	(PAGA) Receipt and review of email correspondence from Opposing Counsel providing supplemental responses to client production of documents.	225	22.5	Morgan Edgar	
12/17/24	0.1	Receipt and review of internal memo from Case Staffer regarding the relevant time period dates for the class action and PAGA matters.	225	22.5	Morgan Edgar	
12/17/24	0.1	Receipt and review of email correspondence from Opposing Counsel granting extension of time on motion to compel deadline.	225	22.5	Morgan Edgar	
12/17/24	0.2	Remove bates numbers from expert witness exhibits as documents have not been produced, and overlap with other client documents.	135	27	Jack Wislar	
12/17/24	0.2	Review case file for relevant time periods.	150	30	Karla Roman	
12/17/24	0.1	Office conference between Attorney LFW, Attorney KEC and Paralegal MYE regarding upcoming Motion to Compel deadlines for Defendant's inadequate discovery responses in both the PAGA and class matters.	450	45	Katherine Cervantes	
12/17/24	0.1	Office conference between Attorney LFW, Attorney KEC and Paralegal MYE regarding upcoming Motion to Compel deadlines for Defendant's inadequate discovery responses in both the PAGA and class matters.	675	67.5	Lenden Webb	
12/17/24	0.2	Receipt and review of email correspondence from co -counsel regarding PAGA action meet and confer and draft response regarding same.	450	90	Katherine Cervantes	
12/17/24	0.2	Draft further meet and confer correspondence to opposing counsel regarding document review.	450	90	Katherine Cervantes	
12/17/24	0.2	Receipt and review of email correspondence from opposing counsel regarding extension and draft response regarding same.	450	90	Katherine Cervantes	
12/17/24	0.9	Receipt and review of motion to compel discovery issues.	225	202.5	Morgan Edgar	
12/17/24	0.5	PAGA- Draft meet and confer correspondence to opposing counsel regarding discovery response meet and confer.	450	225	Katherine Cervantes	
12/17/24	0.6	Class - Draft meet and confer to opposing counsel regarding outstanding discovery responses.	450	270	Katherine Cervantes	
12/18/24	0.1	Office conference between Attorney KEC and Paralegal MYE regarding potential missing documents warranting motion to compel for the PAGA action.	225	22.5	Morgan Edgar	
12/18/24	0.1	Office conference between Attorney KEC and Paralegal MYE regarding potential missing documents warranting motion to compel for the PAGA action.	450	45	Katherine Cervantes	

12/18/24	0.4	Draft and send meet and confer correspondence to opposing counsel regarding defendants class action production.	450	180	Katherine Cervantes	
12/18/24	1	(PAGA) Prepare draft of internal memo to Case Staffer regarding relevant time period and responsive documents produced.	225	225	Morgan Edgar	
12/18/24	1.8	(PCD 0.2) Open combined PDF of all client documents, save individually, re-bates number, re-name, discard duplicates, save to client file. Draft internal memo to case staff regarding the same.	135	243	Jack Wislar	
12/19/24	0.1	Receipt and review of email correspondence from Opposing Counsel regarding confirming employees enter their hours directly to third-party payroll provider and the only outstanding information being sought are class member addresses.	225	22.5	Morgan Edgar	
12/19/24	0.2	(CLASS) Receipt and review of email correspondence from Co-Counsel regarding outcome of Case Management Conference hearing for the class matter in San Mateo Superior Court.	225	45	Morgan Edgar	
12/19/24	0.2	Draft calendar entries pursuant to Case Management Conference hearing for deadline to file Joint CMC Statement and set continued CMC hearing date.	225	45	Morgan Edgar	
12/19/24	0.2	Class- Receipt and review of email correspondence from opposing counsel regarding defendants document production, and draft response regarding same.	450	90	Katherine Cervantes	
12/19/24	0.2	Class - Receipt and review of email correspondence from opposing counsel regarding agreement to extend motion to compel deadline.	450	90	Katherine Cervantes	
12/19/24	0.2	Receipt and review of email correspondence from co-counsel regarding case management conference and third set of discovery, draft response regarding same.	450	90	Katherine Cervantes	
12/20/24	0.1	File save Case Management Conference statement and Joint Case Management Conference Statement from County of San Mateo Register of Actions.	150	15	Karla Roman	
12/20/24	0.2	Begin post-CMC checklist by calendaring dates and deadlines related to Case Management Conference on May 5, 2025.	150	30	Karla Roman	
1/6/25	0.1	Receipt and review of internal memo from Case Staffer to draft calendar entry for following-up with Opposing Counsel regarding production of the class list.	275	27.5	Morgan Edgar	
1/6/25	0.1	Receipt and review of email correspondence from Client regarding rescheduling of Opposing Counsel conducting her deposition.	275	27.5	Morgan Edgar	
1/6/25	0.2	Receipt and review of internal memo from Case Staffer regarding confirmation of the PAGA and Class motions to compel deadlines. Subsequently draft responsive internal memo regarding the same.	275	55	Morgan Edgar	
1/6/25	0.2	Draft internal memo regarding Motion to Compel deadlines for cases.	450	90	Katherine Cervantes	
1/6/25	0.2	Receipt and review of internal memo, and draft response to follow up with opposing counsel re class list production.	450	90	Katherine Cervantes	
1/7/25	0.1	Draft calendar entries for Class Motion to Compel deadline and following up with Opposing Counsel for production of class list.	275	27.5	Morgan Edgar	
1/10/25	0.1	Receipt and review of email correspondence from Case Staffer to Opposing Counsel regarding status on production of the class list.	275	27.5	Morgan Edgar	
1/10/25	0.1	Draft email correspondence to opposing counsel re providing class addresses.	450	45	Katherine Cervantes	
1/13/25	0.1	Draft of email correspondence to Opposing Counsel regarding scheduling of meeting to discuss case.	675	67.5	Lenden Webb	
1/13/25	0.2	Conference between Attorney LFW and Attorney KEC regarding case initiation and action to follow up on further class information.	450	90	Katherine Cervantes	
1/14/25	0.1	Receipt and review of email correspondence from Opposing counsel to discuss case, draft response regarding same.	450	45	Katherine Cervantes	
1/15/25	0.1	Receipt and review of internal memo from Case Staffer regarding the PAGA and Class periods and the available class lists produced during discovery.	275	27.5	Morgan Edgar	
1/15/25	0.8	Review of file in preparation to meet and confer regarding discovery.	450	360	Katherine Cervantes	
1/16/25	0.1	Office conference between Attorney LFW, Attorney KEC, and Paralegal MYE regarding memorialization of telephone conference with Opposing Counsel regarding production of releases, providing class list through the present, or providing class list with employees that are still active.	275	27.5	Morgan Edgar	
1/16/25	0.1	Receipt and review of prepared DNS memorandum from Case Staffer to confirm production of documents from Opposing Counsel. Subsequently propose revisions to confirm class list up to present or with employees still active.	275	27.5	Morgan Edgar	
1/16/25	0.1	Office conference between Attorney LFW, Attorney KEC, and Paralegal MYE regarding memorialization of telephone conference with Opposing Counsel regarding production of releases, providing class list through the present, or providing class list with employees that are still active.	450	45	Katherine Cervantes	
1/16/25	0.2	Office conference between Attorney LFW, Attorney KEC, and Paralegal MYE regarding upcoming scheduled telephone conference with Opposing Counsel, potential PAGA class size, Class action class size, obtaining client settlement authority from Co-Counsel, Defendant's produced incomplete class list and demanding production or, in the alternative, moving forward with drafting Motion to Compel, running soft background checks on class members to obtain names, addresses and phone numbers for witness declarations.	275	55	Morgan Edgar	

1/16/25	0.1	Office conference between Attorney LFW, Attorney KEC, and Paralegal MYE regarding memorialization of telephone conference with Opposing Counsel regarding production of releases, providing class list through the present, or providing class list with employees that are still active.	675	67.5	Lenden Webb
1/16/25	0.2	Office conference between Attorney LFW, Attorney KEC, and Paralegal MYE regarding upcoming scheduled telephone conference with Opposing Counsel, potential PAGA class size, Class action class size, obtaining client settlement authority from Co-Counsel, Defendant's produced incomplete class list and demanding production or, in the alternative, moving forward with drafting Motion to Compel, running soft background checks on class members to obtain names, addresses and phone numbers for witness declarations.	450	90	Katherine Cervantes
1/16/25	0.2	Draft email correspondence to opposing counsel regarding discovery response concerns.	450	90	Katherine Cervantes
1/16/25	0.4	Telephone conference between Attorney LFW, Attorney KEC, and Paralegal MYE regarding Motion to Compel deadline, case facts and producing class lists to present or with class list with names, addresses, telephone numbers and email addresses.	275	110	Morgan Edgar
1/16/25	0.2	Office conference between Attorney LFW, Attorney KEC, and Paralegal MYE regarding upcoming scheduled telephone conference with Opposing Counsel, potential PAGA class size, Class action class size, obtaining client settlement authority from Co-Counsel, Defendant's produced incomplete class list and demanding production or, in the alternative, moving forward with drafting Motion to Compel, running soft background checks on class members to obtain names, addresses and phone numbers for witness declarations.	675	135	Lenden Webb
1/16/25	0.4	Telephone conference between Attorney LFW, Attorney KEC, and Paralegal MYE regarding Motion to Compel deadline, case facts and producing class lists to present or with class list with names, addresses, telephone numbers and email addresses.	675	270	Lenden Webb
1/16/25	2	Review of file to determine work week count, review of claims, and outline case notes.	450	900	Katherine Cervantes
1/20/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding request for specific discovery responses at issue for extension of Motion to Compel deadline and to provide current class list for his review.	275	27.5	Morgan Edgar
1/20/25	0.2	Office conference between Paralegal MYE and Legal Assistant KJR regarding file saving of PAGA Box folder.	150	30	Karla Roman
1/20/25	0.3	Office conference between Paralegal MYE and Legal Assistant KJR regarding organization of Client and Defendant's discovery responses and requests for PAGA and Class Action.	150	45	Karla Roman
1/20/25	0.2	Office conference between Paralegal MYE and Legal Assistant KJR regarding file saving of PAGA Box folder.	275	55	Morgan Edgar
1/20/25	0.2	Receipt and review of San Mateo local rules of Court regarding mandatory Informal Discovery Conference requirement prior to filing motion to compel.	275	55	Morgan Edgar
1/20/25	0.3	Office conference between Paralegal MYE and Legal Assistant KJR regarding organization of Client and Defendant's discovery responses and requests for PAGA and Class Action.	275	82.5	Morgan Edgar
1/20/25	0.2	Receipt and review of email correspondence from opposing counsel regarding discovery requests and draft response regarding same.	450	90	Katherine Cervantes
1/20/25	0.5	Receipt and review of Defendant's produced documents to confirm class lists with address, telephone numbers, termination date and email addresses.	275	137.5	Morgan Edgar
1/21/25	0.2	Draft internal memo to file regarding procedure for file saving of discovery responses and requests.	150	30	Karla Roman
1/21/25	0.3	Prepare draft of DNS memorandum for Case Staffer review regarding production of class list.	275	82.5	Morgan Edgar
1/21/25	0.2	Receipt and review of email correspondence from opposing counsel regarding deposition and draft response regarding same.	450	90	Katherine Cervantes
1/21/25	0.2	Draft internal memo to MYE regarding action to draft deposition notice.	450	90	Katherine Cervantes
1/21/25	0.2	Draft email correspondence to opposing counsel regarding motion to compel and idc.	450	90	Katherine Cervantes
1/21/25	0.2	Draft email correspondence to opposing counsel regarding further meet and confer re discovery responses.	450	90	Katherine Cervantes
1/21/25	1.2	(PCD 0.7) Receipt and organization of 21 client documents and create file name.	95	114	Aracelli Meza
1/21/25	0.5	Receipt and review of email correspondence from Opposing Counsel contending production of a class list with names, addresses, e-mail addresses and telephone numbers for the entire class period. Subsequently review Box link provided by Opposing Counsel to draft internal memo to Case Staffer regarding the same.	275	137.5	Morgan Edgar
1/21/25	2.1	Sort, list, rename and convert to pdf client files.	110	231	Luis Fernando Gonzalez
1/21/25	3.1	(PCD 1.4) Receipt and organization of 97 client documents and create file name. Draft of internal memo regarding the same.	95	294.5	Camila Nicole Gonzalez
1/22/25	0.2	Receipt and review of email correspondence exchanged between Case Staffer and Opposing Counsel regarding Defendant's inadequate production of documents and production of class list.	275	55	Morgan Edgar
1/22/25	0.1	Draft of email correspondence to Opposing Counsel regarding clarification if Opposing Counsel is refusing to produce class list or if office needs to propound a new Discovery Request or a Demand to Supplement. Defer to preference of Opposing Counsel.	675	67.5	Lenden Webb

1/22/25	0.1	Draft of email correspondence to Opposing Counsel regarding outdated class list and request for an updated list.	675	67.5	Lenden Webb	
1/22/25	0.1	Draft of email correspondence to Opposing Counsel regarding impeded access to witness contact information and request to have Opposing Side provide updated list within a few days.	675	67.5	Lenden Webb	
1/22/25	0.2	Draft email correspondence to opposing counsel regarding discovery production.	450	90	Katherine Cervantes	
1/22/25	0.5	Receipt and review of Informal Discovery Conference calendar. Subsequently draft email correspondence to San Mateo Superior Court requesting informal discovery conference.	275	137.5	Morgan Edgar	
1/22/25	1.6	(PCD 1.1) Receipt and organization of 24 client documents. Create file name about Discovery documents.	95	152	Camila Nicole Gonzalez	
1/22/25	1.6	(PCD 0.8) Finalize organization of 51 client documents and create file name.	95	152	Aracelli Meza	
1/23/25	0.2	Draft email correspondence to opposing counsel regarding further meet and confer on defendants production of documents.	450	90	Katherine Cervantes	
1/23/25	0.2	Receipt and review of deposition notice and draft response regarding same.	450	90	Katherine Cervantes	
1/24/25	0.1	Draft of email correspondence to opposing counsel regarding producing contact list.	675	67.5	Lenden Webb	
1/24/25	0.2	Draft internal memo regarding motion to compel.	450	90	Katherine Cervantes	
2/3/25	0.1	Office conference between Paralegal MYE and Legal Assistant KJR regarding drafting email correspondence to San Mateo Superior Court Informal Discovery Conference to secure informal discovery conference.	150	15	Karla Roman	
2/3/25	0.1	Draft internal memo to Case Staffer regarding meeting with Co-Counsel regarding settlement authority and class representative.	275	27.5	Morgan Edgar	
2/3/25	0.1	Office conference between Paralegal MYE and Legal Assistant KJR regarding drafting email correspondence to San Mateo Superior Court Informal Discovery Conference to secure informal discovery conference.	275	27.5	Morgan Edgar	
2/3/25	0.2	Telephone conference between Civil Clerk of San Mateo Superior Court regarding Informal Discovery Conference scheduling and to confirm receipt and acknowledgement of our office's informal discovery conference request.	275	55	Morgan Edgar	
2/3/25	0.3	Telephone conference between Paralegal MYE and San Mateo Superior Court regarding confirming of securing Informal Discovery Conference date.	275	82.5	Morgan Edgar	
2/4/25	0.1	Receipt and review of internal memo from Case Staffer regarding action to draft email correspondence to class representative regarding procedural update and current status of case.	275	27.5	Morgan Edgar	
2/6/25	0.1	Receipt and review of email correspondence from Orange Superior Court regarding service of Notice of Case Reassignment. Draft internal memo to file regarding file saving the same.	675	67.5	Lenden Webb	
2/7/25	0.1	Receipt and organization of Notice of Case Reassignment - 2025 03 Mar 03, save to client file, and draft of internal memo regarding the same.	135	13.5	Kelley Kilgore	
2/7/25	0.1	Receipt and review of email correspondence regarding service of Notice of Case Reassignment in Orange Superior Court.	275	27.5	Morgan Edgar	
2/7/25	0.1	Receipt and review of internal memo from Case Staffer regarding confirming file saving of service of Notice of Case Reassignment in Orange Superior Court.	275	27.5	Morgan Edgar	
2/7/25	0.1	Receipt and review of internal memo from Case Staffer regarding action to contact potential witnesses to further support Client's claims.	275	27.5	Morgan Edgar	
2/8/25	0.2	Receipt and review of email correspondence from Superior Court, regarding notice of case reassignment.	450	90	Katherine Cervantes	
2/12/25	0.1	Office conference between Paralegal MYE and Legal Assistant KJR regarding task to follow up with IDC regarding confirmation of April 3, 2025 availability for Informal Discovery Conference.	150	15	Karla Roman	
2/12/25	0.1	Draft of email correspondence to San Mateo Superior Court regarding update on previous request for Informal Discovery Conference.	150	15	Karla Roman	
2/12/25	0.1	Office conference between Paralegal MYE and Legal Assistant KJR regarding task to follow up with IDC regarding confirmation of April 3, 2025 availability for Informal Discovery Conference.	275	27.5	Morgan Edgar	
2/13/25	0.1	Office conference between Paralegal MYE and Legal Assistant KJR regarding contacting assigned judge and department via email correspondence to request informal discovery conference for complex class action.	150	15	Karla Roman	
2/13/25	0.1	Office conference between Paralegal MYE and Legal Assistant KJR regarding contacting assigned judge and department via email correspondence to request informal discovery conference for complex class action.	275	27.5	Morgan Edgar	
2/13/25	0.1	Prepare draft of email correspondence to class representative regarding procedural status and update on case relating to informal discovery conference.	275	27.5	Morgan Edgar	
2/13/25	0.2	Voicemail left with clerk of Department 11 of San Mateo Court regarding request for Informal Discovery Conference. Draft of email correspondence to Clerk regarding the same.	150	30	Karla Roman	

2/13/25	0.2	Receipt and review of internal memo from Case Staffer regarding email correspondence sent by San Mateo Superior Court regarding informal discovery conferences for complex cases.	275	55	Morgan Edgar
2/15/25	0.2	Draft internal memo regarding status of motion to compel.	450	90	Katherine Cervantes
2/17/25	0.1	Receipt and organization of Notice of Case Reassignment.	125	12.5	Christine Giovannoni
2/19/25	0.1	Office conference between Paralegal MYE and Legal Assistant KJR regarding task to follow up with San Mateo court regarding scheduling of Informal Discovery Conference once court reopens.	150	15	Karla Roman
2/19/25	0.1	Office conference between Paralegal MYE and Legal Assistant KJR regarding task to follow up with San Mateo court regarding scheduling of Informal Discovery Conference once court reopens.	275	27.5	Morgan Edgar
2/19/25	0.1	Receipt and review of internal memo from Case Staffer regarding update on obtaining an IDC date and time. Subsequently draft responsive internal memo regarding the same.	275	27.5	Morgan Edgar
2/19/25	0.1	Draft email correspondence to Class Representative requesting confirmation on date and time to meet via Zoom.	275	27.5	Morgan Edgar
2/19/25	0.1	Receipt and review of email correspondence from class representative regarding availability for scheduled Zoom meeting.	275	27.5	Morgan Edgar
2/19/25	0.1	Receipt and review of internal memo regarding IDC and draft response regarding same.	450	45	Katherine Cervantes
2/19/25	0.1	Draft internal memo to file regarding action to inform staffers if Client has not responded to request to meet via Zoom to formally introduce firm to Client.	675	67.5	Lenden Webb
2/20/25	0.1	Receipt and review of San Mateo Superior Court Department 11's email correspondence providing Court's availability for informal discovery conference. Subsequently draft internal memo to Case Staffers regarding the same.	275	27.5	Morgan Edgar
2/20/25	0.1	Draft email correspondence to Client with Zoom credentials for meeting to introduce office as Co-Counsel.	275	27.5	Morgan Edgar
2/20/25	0.1	Receipt and review of email correspondence from Client regarding meeting to discuss case.	450	45	Katherine Cervantes
2/20/25	0.1	Draft internal memo to file regarding task to call Opposing Counsel to confirm availability on April 2 for court's suggested time for Informal Discovery Conference.	675	67.5	Lenden Webb
2/20/25	0.2	Receipt and review of email correspondence from court regarding IDC, action to contact court regarding same.	450	90	Katherine Cervantes
2/21/25	0.1	Receipt and review of email correspondence from Opposing Counsel confirming amenable to date and time of San Mateo Superior Court Informal Discovery Conference.	275	27.5	Morgan Edgar
2/21/25	0.2	Draft email correspondence to opposing counsel regarding informal discovery conference.	450	90	Katherine Cervantes
2/21/25	0.2	Receipt and review of email correspondence from opposing counsel regarding IDC availability.	450	90	Katherine Cervantes
2/21/25	0.2	Draft email correspondence to court regarding IDC date.	450	90	Katherine Cervantes
2/22/25	0.1	Calendar Informal Discovery Conference for April 2, 2025 at 3 PM.	150	15	Karla Roman
2/24/25	0.1	Telephone conference between Office Coordinator GIO and class representative, David Mejia, regarding request to reschedule Zoom conference with staffers. Leave voicemail.	125	12.5	Christine Giovannoni
2/24/25	0.1	(PCD 0.1) Draft internal memo to file regarding retainer agreement with class representative contact information.	150	15	Karla Roman
2/24/25	0.3	Office conference between Paralegal MYE and Class Representative David Mejia regarding procedural status of case and outstanding discovery issues to be addressed at upcoming discovery conference.	275	82.5	Morgan Edgar
2/24/25	0.2	Receipt and review of update regarding IDC.	450	90	Katherine Cervantes
3/4/25	0.1	Receipt and review of internal memo from Case Staffer regarding Orange County Superior Court notice of continuance of Case Management Conference hearing.	275	27.5	Morgan Edgar
3/4/25	0.2	Receipt and review of continuance of CMC.	450	90	Katherine Cervantes
3/5/25	0.2	Create a box folder for Client access. Make a copy of all Client Documents and Opposing Documents and place them in to folder for Client's view.	110	22	Samantha Silva
3/5/25	0.1	Office conference between Paralegal MYE and Office Assistant Office SAM	275	27.5	Morgan Edgar
3/6/25	0.1	Receipt and review of informal discovery conference date and time to confirm remote appearance.	275	27.5	Morgan Edgar
3/6/25	0.1	Update and revise prepared Client Access folder to provide client the link to review Client and Opposing documents.	275	27.5	Morgan Edgar
3/6/25	0.5	Draft email to class rep.	275	137.5	Morgan Edgar
3/7/25	0.2	Receipt and review of email correspondence from class representative regarding documents.	450	90	Katherine Cervantes
3/14/25	0.1	Review Zoom credential for Department L Informal Discovery Conference. Update calendar with the same.	150	15	Karla Roman
3/14/25	0.1	Office conference between Attorney KEC and Legal Assistant KJR regarding task to draft script for initial intake for potential witnesses.	150	15	Karla Roman

3/14/25	0.1	Receipt and review of Case Staffer edits to witness initial questionnaire. File save.	150	15	Karla Roman	
3/14/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE, and Legal Assistant KJR regarding action to call and text potential witnesses.	150	15	Karla Roman	
3/14/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE, and Legal Assistant KJR regarding action to call and text potential witnesses.	150	15	Karla Roman	
3/14/25	0.1	Receipt and review of internal memo from Case Staffer regarding confirmation of in person or remote appearance for San Mateo Superior Court Informal Discovery Conference.	275	27.5	Morgan Edgar	
3/14/25	0.1	Receipt and review of deadline to file Informal discovery conference brief. Subsequently draft internal memo regarding the same.	275	27.5	Morgan Edgar	
3/14/25	0.1	Draft email correspondence to Department 11 of San Mateo Superior Court to confirm if Informal Discovery Conference will be held remotely.	275	27.5	Morgan Edgar	
3/14/25	0.1	Receipt and review of email correspondence from Department 11 of San Mateo Superior Court confirming Informal Discovery Conference will be held remotely. Draft internal memo to Case Staffer regarding the same.	275	27.5	Morgan Edgar	
3/14/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding available dates for defending Client's noticed deposition.	275	27.5	Morgan Edgar	
3/14/25	0.1	Receipt and review of email correspondence from Opposing Counsel circulating dates for noticing deposition of Client.	275	27.5	Morgan Edgar	
3/14/25	0.1	Receipt and review internal memo from Case Staffer regarding prepared draft of Witness Questionnaire.	275	27.5	Morgan Edgar	
3/14/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE, and Legal Assistant KJR regarding action to call and text potential witnesses.	275	27.5	Morgan Edgar	
3/14/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE, and Legal Assistant KJR regarding action to call and text potential witnesses.	275	27.5	Morgan Edgar	
3/14/25	0.1	Receipt and review of email correspondence from opposing counsel regarding deposition of Mr. Mejia.	450	45	Katherine Cervantes	
3/14/25	0.1	Receipt and review of email correspondence from opposing counsel regarding deposition dates and draft response regarding same.	450	45	Katherine Cervantes	
3/14/25	0.1	Office conference between Attorney KEC and Legal Assistant KJR regarding task to draft script for initial intake for potential witnesses.	450	45	Katherine Cervantes	
3/14/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding available dates for defending Client's noticed deposition.	450	45	Katherine Cervantes	
3/14/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE, and Legal Assistant KJR regarding action to call and text potential witnesses.	450	45	Katherine Cervantes	
3/14/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE, and Legal Assistant KJR regarding action to call and text potential witnesses.	450	45	Katherine Cervantes	
3/14/25	0.2	Receipt and review of San Mateo Superior Court's Complex Civil Cases department 11's standing orders to confirm Court's procedures.	275	55	Morgan Edgar	
3/14/25	0.4	Draft potential script for witness intakes as per causes of action in Complaint. Draft internal memo to file regarding the same.	150	60	Karla Roman	
3/14/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE, and Legal Assistant KJR regarding action to call and text potential witnesses.	675	67.5	Lenden Webb	
3/14/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE, and Legal Assistant KJR regarding action to call and text potential witnesses.	675	67.5	Lenden Webb	
3/14/25	0.2	Draft internal memo to Senior Paralegal MYE regarding informal discovery conference and deadlines.	450	90	Katherine Cervantes	
3/17/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding task to organize Box folder pleadings, correspondence, and documents.	150	15	Karla Roman	
3/17/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding task to organize Box folder pleadings, correspondence, and documents.	275	27.5	Morgan Edgar	
3/17/25	0.2	Review of Box file. Draft internal memo to file regarding instructions on file saving the files provided by Co-Counsel.	150	30	Karla Roman	
3/18/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE regarding upcoming informal discovery conference and deposition of Client.	275	27.5	Morgan Edgar	
3/18/25	0.1	Office conference between Attorney KEC and Paralegal MYE regarding deadline to prepare draft of informal discovery conference brief.	275	27.5	Morgan Edgar	
3/18/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding contacting Client to confirm availability for deposition on dates proposed by Opposing Counsel.	275	27.5	Morgan Edgar	
3/18/25	0.1	Draft email correspondence to Client to confirm availability for Opposing Counsel to conduct Client's deposition.	275	27.5	Morgan Edgar	

3/18/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE regarding upcoming informal discovery conference and deposition of Client.	450	45	Katherine Cervantes
3/18/25	0.1	Office conference between Attorney KEC and Paralegal MYE regarding deadline to prepare draft of informal discovery conference brief.	450	45	Katherine Cervantes
3/18/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding contacting Client to confirm availability for deposition on dates proposed by Opposing Counsel.	450	45	Katherine Cervantes
3/18/25	0.1	Receipt and review of email correspondence from opposing counsel regarding deposition availability, and draft response regarding same.	450	45	Katherine Cervantes
3/18/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE regarding upcoming informal discovery conference and deposition of Client.	675	67.5	Lenden Webb
3/18/25	2.5	SCRAM - Organize Box Folder and Rename - Exhibit Book - Expert - JPA - Mediation	110	275	Luis Fernando Gonzalez
3/18/25	3.5	(PCD 1.2) Receipt and organization of 109 client documents. Create file name.	95	332.5	Aracelli Meza
3/18/25	5.8	SCRAM - Organize Box Folder and Rename (Correspondence 24 files, Exhibit Book 65 files)	95	551	Camila Nicole Gonzalez
3/18/25	5.8	Receipt and organization of 50 client documents. Organize Box Folder Page Only.	95	551	Jose Augusto Rojas Vega
3/19/25	0.1	Confirm date and time of upcoming PAGA Case Management Conference and update draft of calendar entry regarding the same.	275	27.5	Morgan Edgar
3/19/25	2	(PCD 0.9) Continue organization of 61 client documents. Create file name.	95	190	Aracelli Meza
3/19/25	1	Begin preparing draft Informal Discovery Conference brief.	275	275	Morgan Edgar
3/19/25	4	(PCD 1.8) Receipt and organization of 88 client documents, create file name and create 4 new folders in Box.	95	380	Camila Nicole Gonzalez
3/19/25	7	Continue organization of 60 client documents. Organize Box Folder Page Only.	95	665	Jose Augusto Rojas Vega
3/20/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, and Legal Assistant KJR regarding task to conduct background reports on potential witnesses from opposing documents.	150	15	Karla Roman
3/20/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding producing Class list from the available date produced by Defendant in discovery.	150	15	Karla Roman
3/20/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding producing Class list from the available date produced by Defendant in discovery.	150	15	Karla Roman
3/20/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, and Legal Assistant KJR regarding task to conduct background reports on potential witnesses from opposing documents.	275	27.5	Morgan Edgar
3/20/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding producing Class list from the available date produced by Defendant in discovery.	275	27.5	Morgan Edgar
3/20/25	0.1	Receipt and review of email correspondence from Client confirming availability for deposition on May 22nd and May 21st.	275	27.5	Morgan Edgar
3/20/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, and Legal Assistant KJR regarding task to conduct background reports on potential witnesses from opposing documents.	450	45	Katherine Cervantes
3/20/25	0.4	Combine several Opposing Counsel produced excel lists to create witness list.	150	60	Karla Roman
3/20/25	2.2	(PCD 0.9) Continue organization of 70 client documents, create file name and new folders in Box.	95	209	Aracelli Meza
3/20/25	2.4	(PCD 1.5) Receipt and organization of 31 client documents, verify Proof of Service and Verification documents.	95	228	Camila Nicole Gonzalez
3/20/25	0.9	Receipt and review of procedural history of the case and index discovery requests to draft IDC brief.	275	247.5	Morgan Edgar
3/20/25	1.2	Draft informal discovery conference brief.	275	330	Morgan Edgar
3/21/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding update from First Legal as to timeframe for rush and regular orders to docket documents with San Francisco Superior Court.	150	15	Karla Roman
3/21/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding update from First Legal as to timeframe for rush and regular orders to docket documents with San Francisco Superior Court.	275	27.5	Morgan Edgar
3/21/25	0.1	Draft internal memo to Case Staffer regarding including privileged work product class list as an exhibit to Informal Discovery Conference brief.	275	27.5	Morgan Edgar

3/21/25	0.2	Receipt and review of potential class member list drafted by Case Staffer from Defendant's production of documents. Confirm missing addresses, telephone numbers and email addresses as request in Request for Production of Document No. 16, Set One.	275	55	Morgan Edgar
3/21/25	0.4	Create excel list. Remove class members who signed releases. Draft internal memo to file regarding the same.	150	60	Karla Roman
3/21/25	1	Finish drafting informal discovery conference brief and selection of proposed exhibits.	275	275	Morgan Edgar
3/21/25	2.9	(PCD 0.9) Continue organization of 109 client documents, create file name and new folders in Box.	95	275.5	Aracelli Meza
3/24/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Legal Assistant KJR regarding task to create Box link with all excel sheets produced by Opposing Counsel.	150	15	Karla Roman
3/24/25	0.1	Receipt and review of prepared draft of Informal Discovery Conference brief for Case Staffer review and filing.	275	27.5	Morgan Edgar
3/24/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding draft of Informal Discovery Brief and potential exhibits.	275	27.5	Morgan Edgar
3/24/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Legal Assistant KJR regarding task to create Box link with all excel sheets produced by Opposing Counsel.	275	27.5	Morgan Edgar
3/24/25	0.2	Create PDF versions of three excel sheets used to create draft witness list for case staffer to attach to mediation brief as exhibits. Draft internal memo to file regarding the same.	150	30	Karla Roman
3/24/25	0.2	Create Box link for all excel sheets produced by Opposing Counsel.	150	30	Karla Roman
3/24/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding draft of Informal Discovery Brief and potential exhibits.	450	45	Katherine Cervantes
3/24/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Legal Assistant KJR regarding task to create Box link with all excel sheets produced by Opposing Counsel.	450	45	Katherine Cervantes
3/24/25	0.2	Receipt and review of internal memo regarding class member list and draft response regarding same.	450	90	Katherine Cervantes
3/24/25	0.5	Receipt and review of Complaint and defendant's production of documents to confirm class period for Informal Discovery Conference Brief.	275	137.5	Morgan Edgar
3/24/25	0.5	Revise informal discovery conference brief.	450	225	Katherine Cervantes
3/25/25	0.1	Receipt and review of internal memo regarding task to not include work product of witness list as exhibits in Informal Discovery Conference brief.	150	15	Karla Roman
3/25/25	0.2	Draft email correspondence to opposing counsel regarding deposition availability.	450	90	Katherine Cervantes
3/26/25	0.1	Office conference between Legal Assistant KJR and Office Coordinator GIO regarding task to UPS ship deposition preparation binder to Client.	125	12.5	Christine Giovannoni
3/26/25	0.1	Office conference between Legal Assistant KJR and Office Coordinator GIO regarding task to UPS ship deposition preparation binder to Client.	150	15	Karla Roman
3/26/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE regarding upcoming informal discovery conference and Defendant's production of documents discovery issues.	275	27.5	Morgan Edgar
3/26/25	0.1	Receipt and review of internal memo from Case Staffer confirming binderizing Client and Opposing documents for Client binder in preparation of Client's upcoming deposition.	275	27.5	Morgan Edgar
3/26/25	0.2	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding preparing folder for Informal Discovery Conference Brief with all produced excel sheets.	150	30	Karla Roman
3/26/25	0.3	Prepare shipment of Client Documents and Preparation for Deposition Binders via UPS.	125	37.5	Romina Machicao
3/26/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE regarding upcoming informal discovery conference and Defendant's production of documents discovery issues.	450	45	Katherine Cervantes
3/26/25	0.3	Print and binderize all discovery responses for client review.	150	45	Karla Roman
3/26/25	0.1	Final review of informal discovery conference brief.	450	45	Katherine Cervantes
3/26/25	0.2	Draft internal memo to Case Staffer regarding preparing binder for Client's upcoming deposition.	275	55	Morgan Edgar
3/26/25	0.2	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding preparing folder for Informal Discovery Conference Brief with all produced excel sheets.	275	55	Morgan Edgar
3/26/25	0.2	Draft email correspondence to Department 11 of San Mateo Superior Court and counsel regarding service of Plaintiff's Informal Discovery Conference Brief.	275	55	Morgan Edgar
3/26/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE regarding upcoming informal discovery conference and Defendant's production of documents discovery issues.	675	67.5	Lenden Webb

3/26/25	0.5	Print and binderize client documents 5001-5323 and opposing documents 2145-2155 for client review before deposition.	150	75	Karla Roman	
3/26/25	0.3	Receipt and review of email correspondence from Opposing Counsel regarding service of Letter to Court Summarizing Discovery Dispute for Informal Discovery Conference. Subsequently review the same.	275	82.5	Morgan Edgar	
3/26/25	0.6	Finish creating Box link for all excel sheets produced by Opposing Counsel in class and PAGA matters. Draft internal memo to file regarding the same. Create separate Box folder for all duplicate excel sheets produced.	150	90	Karla Roman	
3/26/25	1.2	Finalize IDC Brief for service to Opposing Counsel and Court with attached exhibits.	275	330	Morgan Edgar	
3/27/25	0.1	Office conference between Office Coordinator/Legal Assistant JVA and Legal Assistant KJR regarding clarifying question as to how to sort duplicates in Box folder.	125	12.5	Jocelyn Arteaga	
3/27/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding letter to court summarizing discovery dispute. File save the same. Draft internal memo to file regarding the same.	150	15	Karla Roman	
3/27/25	0.1	Office conference between Office Coordinator/Legal Assistant JVA and Legal Assistant KJR regarding clarifying question as to how to sort duplicates in Box folder.	150	15	Karla Roman	
3/27/25	0.1	Office conference between Attorney LFW and Senior Paralegal MYE regarding deposition noticed in-person in San Diego and Client's residence is in San Francisco.	275	27.5	Morgan Edgar	
3/27/25	0.1	Draft calendar entry for Defense taking deposition of Client.	275	27.5	Morgan Edgar	
3/27/25	0.2	Receipt and review of email correspondence from Co-Counsel regarding Notice of Deposition of Plaintiff not served to our office. File save the same. Calendar the Deposition.	150	30	Karla Roman	
3/27/25	0.3	Sort Box folder.	150	45	Karla Roman	
3/27/25	0.2	Receipt and review of Deposition Notice from Opposing Counsel with request for production of documents to take the deposition of Client.	275	55	Morgan Edgar	
3/27/25	0.2	Draft email correspondence to Opposing Counsel confirming receipt of Deposition Notice to Client.	275	55	Morgan Edgar	
3/27/25	0.1	Office conference between Attorney LFW and Senior Paralegal MYE regarding deposition noticed in-person in San Diego and Client's residence is in San Francisco.	675	67.5	Lenden Webb	
3/27/25	0.1	Draft of email correspondence to Opposing Counsel regarding request for all case staffers to be served Notice of Deposition of Plaintiff as per Code of Civil Procedure.	675	67.5	Lenden Webb	
3/27/25	1.9	(PCD 0.9) Continue organization of 53 client documents, create file name and new folders in Box.	95	180.5	Aracelli Meza	
3/28/25	0.1	Track shipping status of Client Binder sent via UPS. Draft internal memo to Legal Assistant KJR regarding estimated date of arrival.	125	12.5	Romina Machicao	
3/28/25	0.1	Draft internal memo to Case Staffer to draft calendar entry for deadline for objections to deposition notice.	275	27.5	Morgan Edgar	
3/28/25	0.2	Calculate and cross-calendar deadline to serve objection to deposition notice of Client.	150	30	Karla Roman	
3/28/25	0.2	Draft email correspondence to Client providing deposition notice and confirmation of potential travel plans to San Diego for said deposition.	275	55	Morgan Edgar	
3/31/25	0.2	Draft of email correspondence to Client regarding delivered binder containing client and opposing documents and verified discovery responses in preparation for deposition on May 20, 2025.	150	30	Karla Roman	
4/1/25	0.1	Office conference between Legal Assistant KJR and Office Assistant ROM regarding case staffer questions as to organization of Box folder.	135	13.5	Romina Machicao	
4/1/25	0.1	Office conference between Legal Assistant KJR, Office Assistant ROM regarding case staffer questions as to organization of Box folder.	150	15	Karla Roman	
4/1/25	0.1	(PCD 0.1) Attempt to telephone conference with Client regarding confirmation of receipt of client documents binder and traveling to San Diego office for notice deposition.	275	27.5	Morgan Edgar	
4/1/25	0.1	Office conference between Attorney KEC and Paralegal MYE regarding Defendant noticing Client's deposition in-person in San Diego and Client's residence being in San Francisco for traveling for deposition.	275	27.5	Morgan Edgar	
4/1/25	0.1	Receipt and review of internal memo from Case Staffer regarding action to draft deposition preparation letter and schedule zoom meeting to prepare for Defense to take Client's deposition.	275	27.5	Morgan Edgar	
4/1/25	0.1	Receipt and review of email correspondence regarding TENCER SHERMAN Letter From 2025 03 Mar 26 re Letter to Court Summarizing Discovery Dispute, and draft response regarding same.	475	47.5	Katherine Cervantes	
4/1/25	0.5	(NB) Office conference between Office Assistant ROM and Case Assistant CNG regarding questions on task to upload spreadsheet with document location to main folder and PAGA folder duplicates.	95	47.5	Camila Nicole Gonzalez	
4/1/25	0.1	Office conference between Attorney KEC and Paralegal MYE regarding Defendant noticing Client's deposition in-person in San Diego and Client's residence being in San Francisco for traveling for deposition.	475	47.5	Katherine Cervantes	

4/1/25	0.8	SCRAM - Organize Box Folder	95	76	Camila Nicole Gonzalez
4/1/25	0.2	Receipt and review of internal memo regarding case folder and review response regarding same.	475	95	Katherine Cervantes
4/1/25	0.2	Receipt and review of Defendants deposition notice and objection timeline.	475	95	Katherine Cervantes
4/1/25	0.2	Draft internal memo regarding action client deposition prep letter, binder of docs, and lets schedule a zoom meeting to prepare the client for the deposition.	475	95	Katherine Cervantes
4/1/25	0.5	Telephone conference between Senior Paralegal MYE and Client regarding preparing for deposition and review of client documents to confirm any potential missing client documents.	275	137.5	Morgan Edgar
4/2/25	0.3	Begin draft of Deposition Preparation Letter.	150	45	Karla Roman
4/2/25	0.1	Draft internal memo to KJR regarding action to send client deposition preparation letter and schedule zoom.	475	47.5	Katherine Cervantes
4/2/25	0.2	Prepare for informational discovery conference.	475	95	Katherine Cervantes
4/2/25	0.2	Attend informal discovery conference.	475	95	Katherine Cervantes
4/7/25	0.6	Research potential class members online to obtain location data for background reports.	150	90	Karla Roman
4/8/25	0.5	Run TLO soft background reports on 12 potential witnesses.	150	75	Karla Roman
4/9/25	0.1	Draft internal memo to file regarding 12 completed background reports on potential witnesses and task to contact 21 potential witnesses regarding initial intake.	150	15	Karla Roman
4/9/25	0.1	Receipt and review of internal memo from Case Staffer regarding obtained background reports on potential witnesses to conduct interviews.	275	27.5	Morgan Edgar
4/9/25	0.2	Draft internal memo to file regarding task to update class list with potential phone, email, and mailing address for 12 potential witnesses based on background reports.	150	30	Karla Roman
4/9/25	0.4	Draft script for witness declarations.	150	60	Karla Roman
4/9/25	0.1	Draft of email correspondence to Opposing Counsel regarding proposition that deposition of Client be conducted in San Diego office.	675	67.5	Lenden Webb
4/9/25	0.4	Draft DNS memorandum for Case Staffer review and authority to send Opposing Counsel regarding compromise to take in-person deposition of Client at our office.	275	110	Morgan Edgar
4/10/25	0.1	Draft internal memo to file regarding task to create superform for class members' engagement letters.	150	15	Karla Roman
4/10/25	0.1	Office conference between Legal Assistant KJR and Office Coordinator GIO regarding edits to drafted Engagement Letter for potential witnesses.	150	15	Karla Roman
4/10/25	0.1	Office conference between Legal Assistant KJR and Office Coordinator GIO regarding edits to drafted Engagement Letter for potential witnesses.	150	15	Christine Giovannoni
4/10/25	0.2	Create, print, and desk Engagement Letter - Superform for review. Make edits.	150	30	Christine Giovannoni
4/10/25	2.4	SCRAM - Background Reports on Potential Witnesses.	95	228	Jose Augusto Rojas Vega
4/11/25	0.1	Draft of email correspondence to Opposing Counsel regarding deposition location.	675	67.5	Lenden Webb
4/14/25	0.5	Draft Deposition Preparation letter to Client. Draft of email correspondence to Client regarding the same, request for clarification as to whether Client will attend remote deposition at office, and request for scheduling of a pre-deposition preparation meeting with Case Staffers.	150	75	Karla Roman
4/15/25	0.1	Mail Deposition Preparation letter via US mail.	150	15	Karla Roman
4/15/25	0.1	Organize client Box folder.	275	27.5	Morgan Edgar
4/15/25	0.1	Draft text message correspondence to Client requesting CA drivers license identification for booking flight to San Diego for Client's deposition.	275	27.5	Morgan Edgar
4/15/25	0.1	Draft internal memo to Case Staffers to proceed booking flight for Client's deposition in San Diego.	275	27.5	Morgan Edgar
4/15/25	0.1	Draft internal memo to Case Staffers regarding action to generate Zoom credentials and draft calendar entry for pre-deposition meeting with Client.	275	27.5	Morgan Edgar
4/15/25	0.2	Create Zoom link for Client deposition preparation meeting on Friday May 9, 2025, calendar, and draft email correspondence to Client regarding the same.	150	30	Karla Roman
4/15/25	0.1	Receipt and review of internal memo regarding deposition preparation.	475	47.5	Katherine Cervantes
4/15/25	0.2	Telephone conference between Senior Paralegal MYE and Client regarding travel arrangements to San Diego for Opposing Counsel to take Client's deposition.	275	55	Morgan Edgar

4/15/25	0.2	Receipt and review of PAGA and Class Action upcoming Case Management Conference hearing dates to confirm dates and deadlines for filing Joint Statements.	275	55	Morgan Edgar
4/16/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding further organization of Box folder.	150	15	Karla Roman
4/16/25	0.1	Update witness list to include note for conducted background reports.	150	15	Karla Roman
4/16/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding task to prioritize calling potential witnesses with most work weeks completed according to class list.	150	15	Karla Roman
4/16/25	0.1	Draft email correspondence to Opposing Counsel regarding request for draft Joint Case Management Conference Statement for the PAGA matter.	275	27.5	Morgan Edgar
4/16/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding action to draft Joint Case Management Conference Statement.	275	27.5	Morgan Edgar
4/16/25	0.1	Office conference between Attorney CBC and Senior Paralegal MYE regarding including discovery dispute in the prepared PAGA Case Management Statement.	275	27.5	Morgan Edgar
4/16/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding further organization of Box folder.	275	27.5	Morgan Edgar
4/16/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding task to prioritize calling potential witnesses with most work weeks completed according to class list.	275	27.5	Morgan Edgar
4/16/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding Opposing Counsel requesting Court set the case for trial and not in agreement to request further Case Management Conference.	275	27.5	Morgan Edgar
4/16/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding Opposing Counsel requesting Court set the case for trial and not in agreement to request further Case Management Conference.	475	47.5	Katherine Cervantes
4/16/25	0.1	Office conference between Attorney CBC and Senior Paralegal MYE regarding including discovery dispute in the prepared PAGA Case Management Statement.	525	52.5	Christian Clark
4/16/25	0.2	Receipt and review of email correspondence regarding Opposing Counsel's proposed Joint Case Management Statement. Subsequently review proposed Joint Case Management Statement.	275	55	Morgan Edgar
4/16/25	1.2	Sort folder.	150	180	Karla Roman
4/16/25	0.7	draft discovery requests.	275	192.5	Morgan Edgar
4/16/25	1.5	draft Joint Case Management Statement.	275	412.5	Morgan Edgar
4/17/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding task to email and text potential witnesses whose contact information we have.	150	15	Karla Roman
4/17/25	0.1	Telephone conference between Legal Assistant KJR and potential witness Heather Burks regarding no further contact.	150	15	Karla Roman
4/17/25	0.1	Draft email correspondence to all counsel of record for service of PAGA Joint Case Management Statement in Orange County Superior Court.	275	27.5	Morgan Edgar
4/17/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding task to email and text potential witnesses whose contact information we have.	275	27.5	Morgan Edgar
4/17/25	0.1	Receipt and review of email correspondence from Opposing Counsel confirming proposed draft of Joint Case Management Statement for filing.	275	27.5	Morgan Edgar
4/17/25	0.1	Receipt and review of deadline to file Joint Case Management State for Class Action in San Mateo Superior Court.	275	27.5	Morgan Edgar
4/17/25	0.3	Prepare Joint Case Management Conference Statement for filing, including OCR scanning and bookmarking. File the same with Orange Superior Court.	150	45	Karla Roman
4/17/25	0.3	Draft of proposed letter to email potential witnesses requesting callback for initial intake. Draft internal memo to file regarding request for review of the same before emailing. Draft of sample email correspondence to potential witnesses regarding sending of the letter.	150	45	Karla Roman
4/17/25	0.3	Draft of email correspondence to 16 potential witnesses regarding request for initial intake or callback.	150	45	Karla Roman
4/17/25	0.1	Receipt and review of email correspondence from client regarding deposition preparation.	475	47.5	Katherine Cervantes
4/17/25	0.2	Execute revisions and edits on draft Joint Case Management Statement. Draft email correspondence to Opposing Counsel regarding the same.	275	55	Morgan Edgar
4/17/25	0.2	Prepare finalized Joint Case Managent Conferencene Statement for filing.	275	55	Morgan Edgar

4/17/25	0.2	Receipt and review of prepared draft of Witness Letter to send potential class members. Subsequently draft internal memo to Case Staffer proposing edits and revisions.	275	55	Morgan Edgar
4/17/25	1.2	SCRAM - Correctly rename documents, remove duplicate documents, and convert Word documents to PDF in the PLEADINGS and CORRESPONDENCE folders	95	114	Camila Nicole Gonzalez
4/17/25	1.1	Finish sorting discovery folders in Box to combine all files and their corresponding verification and proofs of service.	150	165	Karla Roman
4/17/25	2	draft discovery requests.	275	550	Morgan Edgar
4/18/25	0.1	Receipt and review of email correspondence from Heather Burks regarding request for more information regarding lawsuit. Draft of email correspondence to potential witness Heather Burks regarding request for callback or scheduling of meeting to discuss the same.	150	15	Karla Roman
4/18/25	0.1	Receipt and review of internal memo from Case Staffer regarding endorsed filed PAGA Joint Case Management Statement.	275	27.5	Morgan Edgar
4/18/25	0.3	Receipt and organization of Joint CMC Statement 2025 04 April 24 - FULLY EXECUTED - FILED, save to client file, and draft of internal memo regarding the same.	135	40.5	Kelley Kilgore
4/21/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding task to begin contacting potential witnesses.	110	11	Office Webb
4/21/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding task to prioritize contacting nonexempt employees on class list.	150	15	Karla Roman
4/21/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding task to begin contacting potential witnesses.	150	15	Karla Roman
4/21/25	0.2	Office conference between Legal Assistant KJR and Case Assistant GIS regarding causes of action and script for outreach with potential witnesses.	110	22	Office Webb
4/21/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding task to prioritize contacting nonexempt employees on class list.	275	27.5	Morgan Edgar
4/21/25	0.2	Office conference between Legal Assistant KJR and Case Assistant GIS regarding causes of action and script for outreach with potential witnesses.	150	30	Karla Roman
4/21/25	0.3	Update class list formatting.	150	45	Karla Roman
4/21/25	0.3	Office conference between Senior Paralegal MYE and Legal Assistant KJR confirming hire and termination dates for potential class members for Special Interrogatories.	150	45	Karla Roman
4/21/25	0.4	Assist Legal Assistant KJR cross referencing three excel spreadsheets regarding potential witnesses.	125	50	Samantha Silva
4/21/25	0.3	Office conference between Senior Paralegal MYE and Legal Assistant KJR confirming hire and termination dates for potential class members for Special Interrogatories.	275	82.5	Morgan Edgar
4/21/25	0.3	Edit specials rogs.	275	82.5	Morgan Edgar
4/21/25	0.3	Review and revision to Request for Special Interrogatories, Set Four and related set of Requests for Production of Documents. Draft of internal memo concerning the same.	525	157.5	Christian Clark
4/21/25	0.7	Execute revisions on discovery.	275	192.5	Morgan Edgar
4/21/25	1.4	Review of class lists for unique names of possible class members.	150	210	Karla Roman
4/21/25	2.2	Finish drafting special interrogatories set four, request for production of documents set four, and delacARATION of necessity.	275	605	Morgan Edgar
4/22/25	0.1	Office conference between Office Coordinator/Legal Assistant JVA and Legal Assistant KJR regarding task for Case Staffers to transfer information regarding exempt or nonexempt status for employees to class list.	125	12.5	Jocelyn Arteaga
4/22/25	0.1	Office conference between Office Coordinator/Legal Assistant JVA and Legal Assistant KJR regarding task for Case Staffers to transfer information regarding exempt or nonexempt status for employees to class list.	150	15	Karla Roman
4/22/25	0.2	Draft internal memo to file regarding task to combine class list work product with additional list of individuals who were on separate excel sheets produced by Opposing Counsel.	150	30	Karla Roman
4/22/25	0.2	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding confirmation of hire dates for potential witnesses from excel sheets produced by Opposing Counsel to draft discovery requests.	150	30	Karla Roman
4/22/25	0.2	Research location information on 10 additional potential class members to conduct background reports.	150	30	Karla Roman
4/22/25	0.3	Review case staffer draft of excel of unique names from additional excel sheets produced by Opposing Counsel. Cross-reference with waivers to ensure all individuals are potential class members. Draft internal memo to file regarding the same.	150	45	Karla Roman
4/22/25	0.2	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding confirmation of hire dates for potential witnesses from excel sheets produced by Opposing Counsel to draft discovery requests.	275	55	Morgan Edgar

4/22/25	0.2	Receipt and review of email correspondence from Opposing Counsel regarding proposed input for the Complex Case Management Statement for filing in San Mateo Superior Court.	275	55	Morgan Edgar
4/22/25	0.3	Draft email correspondence to Opposing Counsel for service of discovery requests.	275	82.5	Morgan Edgar
4/22/25	1.3	Compile background reports on potential class members into one excel sheet.	95	123.5	Violeta Matto
4/22/25	0.9	Draft Joint Complex Case Management Conference Statement for Opposing Counsel's review and revisions. Subsequently draft email correspondence to Opposing Counsel regarding the same.	275	247.5	Morgan Edgar
4/22/25	2	continue drafting discovery.	275	550	Morgan Edgar
4/23/25	0.1	Receipt of, save to client file and sent to case staffers the Joint CMC Statement 2025 05 May 01 - FILED.	125	12.5	Jocelyn Arteaga
4/23/25	0.1	Receipt and review of fully executed Joint Case Management Statement. Subsequently draft internal memo to Case Staffer to proceed filing and serving.	275	27.5	Morgan Edgar
4/23/25	0.1	Draft internal memo to Case Staffer regarding action to obtain dates to propose for taking the deposition of Defendant's Person Most Qualified with Request for Production of Documents.	275	27.5	Morgan Edgar
4/23/25	0.1	Receipt and review of internal memo from Case Staffer regarding endorsed filed stamped copy of Case Management Statement filed in San Mateo Superior Court.	275	27.5	Morgan Edgar
4/23/25	0.1	Receipt and review of internal memo from Case Staffer regarding proposed dates to conduct deposition of Defendant's Person Most Qualified and to draft Amended Deposition Notice with Request for Production of Documents.	275	27.5	Morgan Edgar
4/23/25	0.2	Draft internal memo to file regarding possible dates to take deposition of Opposing Party Person Most Knowledgeable.	150	30	Karla Roman
4/23/25	0.3	Conduct TLO soft background reports on potential witnesses Crabtree, King, McDonald. Draft internal memo to file regarding task to update work product class list with phone, email, and address information of the same.	150	45	Karla Roman
4/23/25	0.2	Draft email correspondence to Opposing Counsel requesting signature on Joint Case Management Statement to proceed filing in San Mateo Superior Court.	275	55	Morgan Edgar
4/23/25	0.4	Prepare Joint Case Management Conference Statement for San Mateo matter for filing and serving. Draft of email correspondence to Opposing and Co-Counsel regarding service of the same. File the same with San Mateo Superior Court.	150	60	Karla Roman
4/24/25	0.1	Receipt and review of internal memo regarding completed work product of combined class list. File save the same.	150	15	Karla Roman
4/24/25	0.1	Receipt and review of internal memo from Case Staffer regarding finalized draft of class list.	275	27.5	Morgan Edgar
4/24/25	0.2	Office conference between Attorney LFW and Senior Paralegal MYE regarding PAGA Case Management Conference and status on Defendant's discovery responses and Opposing Counsel requesting to set it for trial.	275	55	Morgan Edgar
4/24/25	0.2	Receipt and review of internal memo from Case Staffer regarding prepared draft of class list. Subsequently receipt and review of excel sheet of class list. Draft internal memo to Case Staffer regarding the same.	275	55	Morgan Edgar
4/24/25	0.2	Draft internal memo to Case Staffers regarding outcome of Case Management Conference held in PAGA action and action to draft DNS memorandum to Opposing Counsel regarding the stay in PAGA case and proposing parties participate in second mediation.	275	55	Morgan Edgar
4/24/25	0.8	Continue to Compile background reports on potential class members into one excel sheet.	95	76	Violeta Matto
4/24/25	0.3	Office conference between Attorney LFW and Senior Paralegal MYE regarding outcome of Case Management Conference for PAGA action being stayed and drafting email correspondence to Opposing Counsel regarding the same.	275	82.5	Morgan Edgar
4/24/25	0.2	Office conference between Attorney LFW and Senior Paralegal MYE regarding PAGA Case Management Conference and status on Defendant's discovery responses and Opposing Counsel requesting to set it for trial.	675	135	Lenden Webb
4/24/25	0.3	Office conference between Attorney LFW and Senior Paralegal MYE regarding outcome of Case Management Conference for PAGA action being stayed and drafting email correspondence to Opposing Counsel regarding the same.	675	202.5	Lenden Webb
4/24/25	0.4	Attend Case Management Conference for PAGA action in Orange County Superior Court.	675	270	Lenden Webb
4/24/25	4.1	Voicemail left with 23 Potential Witnesses regarding request for callback to conduct initial intake.	110	451	Office Webb
4/25/25	0.5	Telephone conference between Potential Witness Alexis Ramirez and GIS regarding initial intake.	110	55	Office Webb
4/28/25	0.1	Draft internal memo regarding notes from initial intake with Potential Witness Kristen Moreaux.	110	11	Office Webb
4/28/25	0.3	Telephone conference between Potential Witness Kristen Moreaux and GIS regarding initial intake.	110	33	Office Webb
4/28/25	1.9	Voicemail left with 12 Potential Witnesses regarding request for callback to conduct initial intake	110	209	Office Webb
4/29/25	0.1	Voicemail left with Potential Witness Mateo Hernandez regarding request for callback to conduct initial intake.	110	11	Office Webb
4/29/25	0.1	Receipt and review of internal memo regarding notes from initial intake with potential witness Moreaux.	150	15	Karla Roman

4/29/25	0.1	Receipt and review of internal memo from Case Staffer regarding initial interview notices with potential witness Kristen Moreaux.	275	27.5	Morgan Edgar	
5/1/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding action to draft text messages to potential witnesses requesting scheduling of initial intake.	110	11	Office Webb	
5/1/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding action to draft text messages to potential witnesses requesting scheduling of initial intake.	150	15	Karla Roman	
5/1/25	0.1	Receipt and review of internal memo from Case Staffer regarding outcome of held Case Management Conference and Court's setting of further Case Management Conference in 120 days.	275	27.5	Morgan Edgar	
5/1/25	0.1	Draft internal memo to file regarding action to review Register of Actions regarding any Court order to file and serve notice of next Case Management Conference.	675	67.5	Lenden Webb	
5/1/25	0.3	Attend Case Management Conference in San Mateo Superior Court.	275	82.5	Morgan Edgar	
5/1/25	0.2	Office conference between Attorney LFW, Attorney RNK, and Senior Paralegal MYE regarding status of matter and preparation for CMC.	450	90	Raza Khan	
5/1/25	0.2	Review of San Mateo Local Rules regarding CMC appearance.	450	90	Raza Khan	
5/1/25	0.3	Attend Case Management Conference.	450	135	Raza Khan	
5/1/25	2.8	Text left with 23 Potential Witnesses regarding request for callback to conduct initial intake.	110	308	Office Webb	
5/2/25	0.1	Draft internal memo regarding notes from initial intake with Potential Witness Deborah Futrell.	110	11	Office Webb	
5/2/25	0.1	Office conference between Attorney LFW, Legal Assistant KJR, and Case Assistant GIS regarding status of witness outreach and action to send Engagement Letters to Potential Witnesses with relevant claims.	110	11	Office Webb	
5/2/25	0.1	Office conference between Attorney LFW, Legal Assistant KJR, and Case Assistant GIS regarding status of witness outreach and action to send Engagement Letters to Potential Witnesses with relevant claims.	150	15	Karla Roman	
5/2/25	0.1	Receipt and review of internal memo from Case Staffer regarding action to provide Notice of set Case Management Conference.	275	27.5	Morgan Edgar	
5/2/25	0.2	Receipt and review of internal memo regarding initial intake notes with potential witness Deborah Futrell and review of claims. Draft internal memo to file regarding review of relevance of claims and request for approval to draft Engagement Letter and Declaration.	150	30	Karla Roman	
5/2/25	0.4	Draft of text correspondence between Case Assistant GIS and Potential Witness Eduardo Aguilar regarding scheduling initial intake to discuss potential wage and hour claims.	110	44	Office Webb	
5/2/25	0.1	Draft of interoffice memo to Attorney LFW regarding Notice of CMC to be provided to Opposing Counsel.	450	45	Raza Khan	
5/2/25	0.5	Telephone conference between Potential Witness Deborah Futrell and Case Assistant GIS regarding initial intake.	110	55	Office Webb	
5/2/25	0.1	Office conference between Attorney LFW, Legal Assistant KJR, and Case Assistant GIS regarding status of witness outreach and action to send Engagement Letters to Potential Witnesses with relevant claims.	675	67.5	Lenden Webb	
5/2/25	3.1	Text message left with 23 Potential Witness regarding request for callback to conduct initial intake.	110	341	Office Webb	
5/5/25	0.1	Cross-calendar deadline for filing of Joint Case Management Conference Statement for hearing on May 28, 2025.	150	15	Karla Roman	
5/5/25	0.1	Receipt and review of internal memo from Case Staffer regarding deadline to file Joint Case Management Statement pursuant to Minute Order.	275	27.5	Morgan Edgar	
5/5/25	0.2	Manage and mark completed tasks and organize correspondence into office folders, review flagged tasks and correspondence, unflag completed tasks, and flagging or leaving outstanding action points.	475	95	Katherine Cervantes	
5/6/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding action to draft text correspondence to interviewed witnesses Futrell and Moreux regarding confirmation of facts from intake notes.	110	11	Office Webb	
5/6/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding action to summarize intake notes before providing them to witnesses.	110	11	Office Webb	
5/6/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding potential witness Futrell confirmation of intake notes and action to file save the same to Box.	110	11	Office Webb	
5/6/25	0.1	Draft of text correspondence between Case Assistant GIS and Potential Witness Vicente Ruiz regarding scheduling initial intake to discuss potential wage and hour claims.	110	11	Office Webb	
5/6/25	0.1	Draft of text correspondence between Case Assistant GIS and Potential Witness Juan Oroozco regarding scheduling initial intake to discuss potential wage and hour claims.	110	11	Office Webb	
5/6/25	0.1	Draft of text correspondence between Case Assistant GIS and Potential Witness Alexis Ramirez regarding scheduling initial intake to discuss potential wage and hour claims.	110	11	Office Webb	

5/6/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding action to draft Declaration for witness Moreaux.	110	11	Office Webb	
5/6/25	0.1	Telephone conference between Potential Witness Alexis Ramirez and Case Assistant GIS regarding initial intake.	110	11	Office Webb	
5/6/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding action to draft text correspondence to interviewed witnesses Futrell and Moreux regarding confirmation of facts from intake notes.	150	15	Karla Roman	
5/6/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding action to summarize intake notes before providing them to witnesses.	150	15	Karla Roman	
5/6/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding potential witness Futrell confirmation of intake notes and action to file save the same to Box.	150	15	Karla Roman	
5/6/25	0.1	Receipt and review of internal memo regarding finalized Engagement Letter superform for potential witnesses.	150	15	Karla Roman	
5/6/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding action to draft Declaration for witness Moreaux.	150	15	Karla Roman	
5/6/25	0.1	Receipt of fully executed Engagement Letter for Witness Moreaux, file save, and sent to Case Staffers.	150	15	Karla Roman	
5/6/25	0.1	Finish editing Engagement Letter - CONTINGENCY - CLASS ACTION - SCRAM.	190	19	Christine Giovannoni	
5/6/25	0.2	Telephone conference between Potential Witness Deboarh Futrell and Case Assistant GIS regarding concerns about engaging in matter.	110	22	Office Webb	
5/6/25	0.2	Draft of text correspondence between Case Assistant GIS and Potential Witness Viriana Nevarez regarding scheduling initial intake to discuss potential wage and hour claims.	110	22	Office Webb	
5/6/25	0.2	Draft of text correspondence between Case Assistant GIS and Potential Witness Alexis Ramirez regarding scheduling initial intake to discuss potential wage and hour claims.	110	22	Office Webb	
5/6/25	0.2	Office conference between Legal Assistant KJR and Case Assistant GIS regarding edits to superform for witness declaration.	110	22	Office Webb	
5/6/25	0.2	Office conference between Legal Assistant KJR and Case Assistant GIS regarding edits to declaration for witness Moreaux.	110	22	Office Webb	
5/6/25	0.2	Draft Engagement Letter for potential witness Moreaux. Draft of email correspondence to Moreaux via DocuSign regarding request for review and signature of the same.	150	30	Karla Roman	
5/6/25	0.2	Office conference between Legal Assistant KJR and Case Assistant GIS regarding edits to superform for witness declaration.	150	30	Karla Roman	
5/6/25	0.2	Office conference between Legal Assistant KJR and Case Assistant GIS regarding edits to declaration for witness Moreaux.	150	30	Karla Roman	
5/6/25	0.1	Confirmation of filing Joint CMC Statement 2025 05 May 01 - FILED.	475	47.5	Katherine Cervantes	
5/6/25	0.1	Receipt and review of memo from Attorney LFW regarding mediation and depositions, draft response regarding same.	475	47.5	Katherine Cervantes	
5/6/25	0.1	Receipt and review of Case Management Conference Notes, action to prepare notice and complete post conference checklist.	475	47.5	Katherine Cervantes	
5/6/25	0.5	Draft of text correspondence between Case Assistant GIS and Potential Witness Kristen Moreaux regarding review of interview notes from initial intake and email confirmation for Engagement Letter and.	110	55	Office Webb	
5/6/25	0.5	Telephone conference between Potential Witness Kristin Moreux and Case Assistant GIS regarding additional clarification and facts from initial intake notes to draft Witness Declaration.	110	55	Office Webb	
5/6/25	0.2	Draft internal memo to Case Staffer regarding action to propose dates to Opposing Counsel for taking deposition of Defendant's Person Most Qualified.	275	55	Morgan Edgar	
5/6/25	0.2	Receipt and review of internal memos from Case Staffers regarding action to draft Engagement Letters and proceed obtaining declarations from potential class witnesses.	275	55	Morgan Edgar	
5/6/25	0.8	Draft of Witness Declaration for Potential Witness Kristin Moreux.	110	88	Office Webb	
5/6/25	0.2	Receipt and review of several email correspondence regarding joint CMC statement and deposition of PMQ.	475	95	Katherine Cervantes	
5/6/25	0.2	Revise class engagement letter.	475	95	Katherine Cervantes	
5/6/25	1.2	Draft of text correspondence between Case Assistant GIS and Potential Witness Deborah Futrell regarding review of interview notes from initial intake, contingency fees and confirmation of email address.	110	132	Office Webb	
5/6/25	2.1	Text messages left with 20 Potential Witnesses regarding request for scheduling of initial intake.	110	231	Office Webb	
5/7/25	0.1	Telephone conference between Potential Witness Vicente Ruiz and Case Assistant GIS regarding notice of matter and similar claims.	110	11	Office Webb	
5/7/25	0.1	Telephone conference between Potential Witness Vicente Ruiz and Case Assistant GIS regarding initial intake.	110	11	Office Webb	
5/7/25	0.1	Office conference between Legal Assistant KJR and Office Assistant SAM regarding action to conduct a Google search on 14 potential witnesses to find location information to conduct background reports.	135	13.5	Samantha Silva	
5/7/25	0.1	Draft internal memo to file regarding action to update format for class list.	150	15	Karla Roman	

5/7/25	0.1	Office conference between Legal Assistant KJR and Office Assistant SAM regarding action to conduct a google search on 14 potential witnesses to find location information to conduct background reports.	150	15	Karla Roman	
5/7/25	0.1	Calendar tentative date for taking of deposition of Opposing Party's Person Most Knowledgeable.	150	15	Karla Roman	
5/7/25	0.2	Telephone conference between Potential Witness Juan Orozco and Case Assistant GIS regarding similar claims and initial intake.	110	22	Office Webb	
5/7/25	0.1	Receipt and review of internal memo regarding defendants PMQ.	475	47.5	Katherine Cervantes	
5/7/25	0.1	Draft internal memo to file regarding no action required to complete a Post- Case Management Conference checklist due to future additional Case Management Conference.	675	67.5	Lenden Webb	
5/7/25	0.7	Draft of Declaration for Potential Witness Kristin Moreux with additional edits per Legal Assistant KJR request.	110	77	Office Webb	
5/7/25	0.2	Draft internal memo regarding action to serve deposition notice with date.	475	95	Katherine Cervantes	
5/7/25	1.8	Conduct search on 15 potential witnesses to gather location information. Draft internal memo to file regarding the same and action to conduct background reports on potential witnesses. Draft internal memo to case staffer regarding information found about each respective potential witness.	135	243	Samantha Silva	
5/8/25	0.1	Voicemail left with Potential Witness Kristina Moreux regarding request for callback for additional clarification for draft of Witness Declaration.	110	11	Office Webb	
5/8/25	0.1	Office conference between Senior Paralegal MYE, Legal Assistant KJR, Case Assistant GIS regarding edits to initial intake questionnaire to determine what training or protocols were in place regarding tracking hours worked.	150	15	Karla Roman	
5/8/25	0.1	Office conference between Senior Paralegal MYE, Legal Assistant KJR, Case Assistant GIS regarding edits to initial intake questionnaire to determine what training or protocols were in place regarding tracking hours worked.	150	15	Office Webb	
5/8/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding action to edit Notice of Case Management Conference to include date Joint Case Management Conference Statement is due.	150	15	Karla Roman	
5/8/25	0.1	Calculate and cross-calendar deadline to file Joint Case Management Conference Statements for Case Management Conference scheduled for August 27, 2025.	150	15	Karla Roman	
5/8/25	0.2	Update of Witness Questionnaire Script regarding updated questions correspondence to wage and hour claims.	110	22	Office Webb	
5/8/25	0.1	Office conference between Senior Paralegal MYE, Legal Assistant KJR, Case Assistant GIS regarding edits to initial intake questionnaire to determine what training or protocols were in place regarding tracking hours worked.	275	27.5	Morgan Edgar	
5/8/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding action to edit Notice of Case Management Conference to include date Joint Case Management Conference Statement is due.	275	27.5	Morgan Edgar	
5/8/25	0.1	Receipt and review of internal memo from Case Staffer regarding deadline to file Joint Case Management Statement in San Mateo Superior Court.	275	27.5	Morgan Edgar	
5/8/25	0.2	Review of Case Staffer draft of witness Moreaux Declaration. Draft internal memo to file regarding action to confirm with witness how many overtime hours she worked each week, update Declaration, and forward to Client via DocuSign after edits.	150	30	Karla Roman	
5/8/25	0.2	Review of Register of Actions for Minute Order regarding continuance of Case Management Conference to August 27, 2025. Calendar the same and include details regarding remote appearance information.	150	30	Karla Roman	
5/8/25	0.3	Telephone conference between Potential Witness Kristin Moreux and Case Assistant GIS regarding additional information in wage and hour claims for Witness Declaration.	110	33	Office Webb	
5/8/25	0.3	Draft of Witness Declaration with additional hour and wage claims from Potential Witness Kristin Moreux.	110	33	Office Webb	
5/8/25	0.2	Receipt and review of draft of Notice of Case Management Conference prepared by Case Staffer for edits and revisions.	275	55	Morgan Edgar	
5/8/25	0.7	Draft Notice of Case Management Conference Statement. Draft of email correspondence to all Counsel regarding service of the same.	150	105	Karla Roman	
5/8/25	0.4	Begin drafting deposition notice to Defendant's Person Most Qualified with Request for Production of Documents.	275	110	Morgan Edgar	
5/9/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding witness Moreaux claims regarding total overtime hours and experience where she was told she was clocking in too much overtime hours. Action to update script to include question regarding whether witness was told they were clocking too many overtime hours.	110	11	Office Webb	
5/9/25	0.1	Office conference between Paralegal MYE and Case Assistant GIS regarding additional clarification needed from Potential Witness Kristin Moreux correspondence to initial intake.	110	11	Office Webb	
5/9/25	0.1	Voicemail left with Potential Witness Kristin Moreux regarding request for callback for additional documentation and clarification for Witness Declaration.	110	11	Office Webb	

5/9/25	0.1	Draft of text correspondence between Case Assistant GIS and Potential Witness Deborah Futrell regarding review and signature of Engagement Letter via DocuSign.	110	11	Office Webb	
5/9/25	0.1	Update of Potential Witness Questionnaire with additional questions to provide detailing for wage and hour claims.	110	11	Office Webb	
5/9/25	0.1	Voicemail left with Potential Witness Deborah Futrell regarding request for review and signature of Engagement Letter.	110	11	Office Webb	
5/9/25	0.1	Draft of text correspondence between Case Assistant GIS and Potential Witness Aaron Rhodes regarding scheduling initial intake to discuss potential wage and hour claims.	110	11	Office Webb	
5/9/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding task to audit class member list and ensure discovery requests included a comprehensive list of all members.	150	15	Karla Roman	
5/9/25	0.1	Calculate and cross-calendar deadline for Opposing Counsel to provide discovery responses to Set Four discovery requests.	150	15	Karla Roman	
5/9/25	0.1	Voicemail left with class representative regarding reminder of deposition preparation meeting. Draft of email correspondence to Client regarding resending of Zoom link.	150	15	Karla Roman	
5/9/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding witness Moreaux claims regarding total overtime hours and experience where she was told she was clocking in too much overtime hours. Action to update script to include question regarding whether witness was told they were clocking too many overtime hours.	150	15	Karla Roman	
5/9/25	0.1	Draft internal memo to file regarding action to update class list with phone and email information for potential witnesses Rhodes and Nepomuceno found on background reports and attempt to contact for initial intakes.	150	15	Karla Roman	
5/9/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding task to audit class member list and ensure discovery requests included a comprehensive list of all members.	275	27.5	Morgan Edgar	
5/9/25	0.1	Telephone conference between Senior Paralegal MYE and Client confirming deposition Zoom meeting.	275	27.5	Morgan Edgar	
5/9/25	0.2	Draft internal memo to file regarding action to run soft background reports on three potential class members, including possible location information.	150	30	Karla Roman	
5/9/25	0.2	Draft Engagement Letter for potential witness Futrell. Draft of email correspondence via DocuSign to Futrell regarding request for review and signature of the same.	150	30	Karla Roman	
5/9/25	0.3	Update of Class List with updated contact information for Potential Witnesses Aaron Schuyler and Hayden Segovian.	110	33	Office Webb	
5/9/25	0.1	Receipt and review of deadline regarding joint case management conference statement filing.	475	47.5	Katherine Cervantes	
5/9/25	0.1	Receipt and review of memo regarding discovery response deadline from opposing counsel to obtain workweeks at issue.	475	47.5	Katherine Cervantes	
5/9/25	0.2	Draft email correspondence to Client with Complaint and Mediation Preparation Letter.	275	55	Morgan Edgar	
5/9/25	0.3	Prepare for Client meeting regarding preparation for Client's deposition.	275	82.5	Morgan Edgar	
5/9/25	0.6	Zoom conference between Attorney KEC, Senior Paralegal MYE, and Client regarding preparing for Client's upcoming deposition.	275	165	Morgan Edgar	
5/9/25	0.6	Zoom conference between Attorney KEC, Senior Paralegal MYE, and Client regarding preparing for Client's upcoming deposition.	475	285	Katherine Cervantes	
5/11/25	0.2	Resend DocuSign envelope containing Engagement Letter to potential witness Futrell. Draft of text correspondence to Futrell regarding request for review of the same.	150	30	Karla Roman	
5/11/25	0.2	Update class list to note completed background reports and notes to not contact potential witnesses who have expressed no interest.	150	30	Karla Roman	
5/11/25	0.3	Draft of email correspondence to 10 potential witnesses requesting callback for initial intake.	150	45	Karla Roman	
5/12/25	0.1	Receipt of fully executed Engagement Letter for witness Futrell, file save, and sent to Case Staffers.	150	15	Karla Roman	
5/12/25	0.3	Review of intake notes in preparation for deposition of clients.	475	142.5	Katherine Cervantes	
5/13/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding sorting all deposition and discovery into their respective PAGA or class folders.	150	15	Karla Roman	
5/13/25	0.1	Office conference between Attorney KEC and Senior Paralegal Senior Paralegal MYE.	275	27.5	Morgan Edgar	
5/13/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding sorting all deposition and discovery into their respective PAGA or class folders.	275	27.5	Morgan Edgar	
5/13/25	0.2	Draft of email correspondence to potential witness Nevarez regarding request for scheduling of meeting and brief description of causes of action in Complaint.	150	30	Karla Roman	
5/13/25	0.1	Receipt and review of work weeks at issue.	475	47.5	Katherine Cervantes	
5/13/25	0.1	Action to draft 998 offer.	475	47.5	Katherine Cervantes	

5/13/25	0.4	Draft first draft of Declaration for witness Futrell. Draft of email correspondence to Futrell requesting additional details regarding reason why she missed ten minute breaks and hours worked off the clock.	150	60	Karla Roman	
5/13/25	0.2	Office conference between LFW and Attorney KEC regarding 998 offer.	475	95	Katherine Cervantes	
5/13/25	0.2	Office conference between LFW and Attorney KEC regarding 998 offer.	675	135	Lenden Webb	
5/13/25	1.5	Review of client file and documents to prepare analysis for 998 offer.	475	712.5	Katherine Cervantes	
5/14/25	0.2	Office conference between Attorney KEC and Senior Paralegal MYE regarding drafting 998 Offer.	275	55	Morgan Edgar	
5/14/25	0.2	Office conference between Attorney KEC and Senior Paralegal MYE regarding drafting 998 Offer.	275	55	Morgan Edgar	
5/14/25	0.2	Revise objections to deposition notice.	475	95	Katherine Cervantes	
5/14/25	0.2	Revise deposition notice.	475	95	Katherine Cervantes	
5/14/25	0.2	Office conference between Attorney KEC and Senior Paralegal MYE regarding 998 number.	475	95	Katherine Cervantes	
5/14/25	0.2	Receipt and review of email correspondence of service of deposition objections and notice of pmq deposition with request for stipulation.	475	95	Katherine Cervantes	
5/14/25	0.4	Execute revisions proposed by Case Staffer on prepared draft of PMQ deposition notice.	275	110	Morgan Edgar	
5/14/25	0.4	Prepare Objections to Depo notice and Notice of Taking PMQ Deposition for service.	275	110	Morgan Edgar	
5/14/25	0.5	Draft email correspondence to Opposing Counsel for service of Objections to Notice of Deposition of Client and Deposition notice of Defendant's PMQ and request to conduct deposition via DepoMate.	275	137.5	Morgan Edgar	
5/14/25	1.7	Draft PMQ depo notice.	275	467.5	Morgan Edgar	
5/15/25	0.1	Draft internal memo to Case Staffer regarding SCRAM00046 document regarding rounding claim.	275	27.5	Morgan Edgar	
5/15/25	0.2	Office conference between Attorney LFW, Attorney KEC, and Senior Paralegal MYE regarding drafting and serving 998 Offer.	275	55	Morgan Edgar	
5/15/25	0.2	Office conference between Attorney LFW, Attorney KEC, and Senior Paralegal MYE regarding drafting and serving 998 Offer.	275	55	Morgan Edgar	
5/15/25	0.2	Receipt and review of internal memo from Case Staffer regarding rounding claim and action to proceed drafting 998 offer for the amount of \$131,800.	275	55	Morgan Edgar	
5/15/25	0.2	Office conference between Attorney LFW, Attorney KEC, and Senior Paralegal MYE regarding drafting and serving 998 Offer.	475	95	Katherine Cervantes	
5/15/25	0.2	Office conference between Attorney LFW, Attorney KEC, and Senior Paralegal MYE regarding drafting and serving 998 Offer.	675	135	Lenden Webb	
5/15/25	0.8	Conduct legal research regarding rounding and draft memorandum regarding same and settlement recommendation.	475	380	Katherine Cervantes	
5/16/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding confirmation of amounts for drafts of 998 offers in both PAGA and class action.	275	27.5	Morgan Edgar	
5/16/25	0.1	Office conference between Attorney CBC and Senior Paralegal MYE regarding drafts of 998 offers.	275	27.5	Morgan Edgar	
5/16/25	0.1	Execute revisions on drafts of 998 offers proposed by Case Staffer.	275	27.5	Morgan Edgar	
5/16/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding confirmation of deposition of Client in-person at San Diego office. Subsequently draft responsive email correspondence regarding the same.	275	27.5	Morgan Edgar	
5/16/25	0.2	Revise 998 offer before service.	475	95	Katherine Cervantes	
5/16/25	0.4	Prepare 998 offers for service. Subsequently draft email correspondence regarding the same.	275	110	Morgan Edgar	
5/16/25	1.6	draft 998 offer	275	440	Morgan Edgar	
5/19/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding informing potential class members of statute of limitations to receive possible referrals for additional potential witnesses.	110	11	Office Webb	
5/19/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding action to forward Declaration to Futrell via DocuSign.	110	11	Office Webb	
5/19/25	0.1	Draft of Witness Declaration sent via DocuSign to Potential Witness Deborah Futrell.	110	11	Office Webb	
5/19/25	0.1	Draft of text correspondence between Case Assistant GIS and Potential Witness Kristin Moreux regarding review and signature of Witness Declaration via DocuSign.	110	11	Office Webb	
5/19/25	0.1	Create zoom link, draft of calendar entry, and draft of email correspondence in regard to meeting scheduled for May 20, 2025.	135	13.5	Jocelyn Arteaga	
5/19/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding confirmation that Opposing Party Person Most Knowledgeable is potential class member and action to contact to review claims.	150	15	Karla Roman	
5/19/25	0.1	Draft of text correspondence to Client regarding boarding flight for plane ticket to San Diego office.	150	15	Karla Roman	
5/19/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding informing potential class members of statute of limitations to receive possible referrals for additional potential witnesses.	150	15	Karla Roman	

5/19/25	0.1	Receipt and review of witness declaration for witness Futrell. Office conference between Legal Assistant KJR and Case Assistant GIS regarding action to forward to Futrell via DocuSign.	150	15	Karla Roman	
5/19/25	0.2	Draft of text correspondence between Case Assistant GIS and Potential Witness Deborah Futrell regarding review and signature of Witness Declaration via DocuSign.	110	22	Office Webb	
5/19/25	0.2	Draft internal memo regarding notes from initial intake with Potential Witness Viriana Nevarez.	110	22	Office Webb	
5/19/25	0.2	Telephone conference between Potential Witness Kristin Moreux and Case Assistant GIS regarding final edits and questions regarding Witness Declaration.	110	22	Office Webb	
5/19/25	0.2	Draft of Witness Declaration sent via DocuSign to Potential Witness Kristin Moruex.	110	22	Office Webb	
5/19/25	0.1	Draft internal memo to Case Staffer regarding Client's flight information for his deposition in San Diego.	275	27.5	Morgan Edgar	
5/19/25	0.1	Office conference between Senior Paralegal MYE and Office Coordinator GIO regarding action to check in Client for travel and draft email correspondence to Client regarding flight information.	275	27.5	Morgan Edgar	
5/19/25	0.1	Office conference between Senior Paralegal MYE and Legal Assistant KJR regarding confirmation that Opposing Party Person Most Knowledgeable is potential class member and action to contact to review claims.	275	27.5	Morgan Edgar	
5/19/25	0.1	Telephone conference between Senior Paralegal MYE and Client regarding flight information for deposition in San Diego.	275	27.5	Morgan Edgar	
5/19/25	0.1	Telephone conference between Senior Paralegal MYE and Opposing Counsel Paralegal regarding Aptus confirmation for deposition of Client.	275	27.5	Morgan Edgar	
5/19/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding deposition confirmation. Draft internal memo to Case Staffers regarding the same.	275	27.5	Morgan Edgar	
5/19/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding taking Client's deposition off calendar and proposing new dates to reschedule deposition.	275	27.5	Morgan Edgar	
5/19/25	0.2	Check Client in for flight from San Francisco to San Diego. Draft of email correspondence to Client regarding flight information.	190	38	Christine Giovannoni	
5/19/25	0.5	Telephone conference between Potential Witness Deborah Futrell and Case Assistant GIS regarding additional information for Witness Declaration.	110	55	Office Webb	
5/19/25	0.5	Draft of Witness Declaration for Potential Witness Deborah Futrell.	110	55	Office Webb	
5/19/25	0.6	Telephone conference between Potential Witness Case Assistant GIS and Viriana Nevarez regarding initial intake.	110	66	Office Webb	
5/19/25	0.1	Telephone conference between Opposing Counsel, Attorney LFW and Case Manager AXL regarding deposition cancellation pending review of 998 offer.	675	67.5	Lenden Webb	
5/19/25	0.1	Office Conference between Attorney LFW, Case Manager AXL, and Legal Assistant JVA regarding action to call client regarding deposition cancellation.	675	67.5	Lenden Webb	
5/19/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding confirmation of rescheduling Client's deposition and proposed new dates; draft of email correspondence in reply regarding intention to confer with Client on availability and confirm new dates.	675	67.5	Lenden Webb	
5/20/25	0.1	Receipt and review of initial intake notes from potential witness Nevarez. Update class list to not contact Nevarez due to strength and relevance of claims.	150	15	Karla Roman	
5/20/25	0.1	Receipt of Witness Futrell signed Declaration, file save, and sent to Case Staffers.	150	15	Karla Roman	
5/20/25	0.1	Draft of email correspondence to Client regarding request for availability on June 2, 2025 or June 3, 2025 for rescheduling of full-day deposition.	150	15	Karla Roman	
5/20/25	0.1	Office conference between Attorney KEC and Legal Assistant KJR regarding strength of claims of two class members with engagement letters.	150	15	Karla Roman	
5/20/25	0.1	Receipt and review of text correspondence from witness Moreaux regarding request for resending of DocuSign. Resend DocuSign with Declaration and draft text correspondence to Moreaux regarding the same.	150	15	Karla Roman	
5/20/25	0.1	Receipt of Moreaux signed Declaration, file save, and sent to Case Staffers.	150	15	Karla Roman	
5/20/25	0.1	Office conference between Attorney LFW, Attorney KEC, and Senior Paralegal MYE regarding Client confirming he is remaining as class representative to recover enhancement award.	275	27.5	Morgan Edgar	
5/20/25	0.1	Draft internal memo to Case Staffers regarding Zoom conference meeting with Client remaining as class representative.	275	27.5	Morgan Edgar	

5/20/25	0.2	Receipt and review of text correspondence from witness Moreaux regarding edits to Declaration. Draft edits. Draft of email correspondence to Moreaux via DocuSign regarding updated Declaration. Draft of text correspondence to Moreaux requesting review and signature of DocuSign envelope.	150	30	Karla Roman	
5/20/25	0.1	Office conference between Attorney LFW, Attorney KEC, and Senior Paralegal MYE regarding settlement dialogue with Opposing Counsel and rescheduling Client's deposition in light of ongoing settlement dialogue.	475	47.5	Katherine Cervantes	
5/20/25	0.1	Receipt and review of email correspondence to client regarding deposition.	475	47.5	Katherine Cervantes	
5/20/25	0.1	Office conference between Attorney KEC and Legal Assistant KJR regarding strength of claims of two class members with engagement letters.	475	47.5	Katherine Cervantes	
5/20/25	0.1	Office conference between Attorney LFW and Attorney KEC regarding response to client regarding individual claims versus class claims and draft response regarding same.	475	47.5	Katherine Cervantes	
5/20/25	0.1	Receipt and review of email correspondence from client regarding options.	475	47.5	Katherine Cervantes	
5/20/25	0.1	Draft email correspondence to client to confirm staying in as class representative.	475	47.5	Katherine Cervantes	
5/20/25	0.1	Office conference between Attorney LFW, Attorney KEC, and Senior Paralegal MYE regarding Client confirming he is remaining as class representative to recover enhancement award.	475	47.5	Katherine Cervantes	
5/20/25	0.1	Office conference between Attorney LFW, Attorney KEC, and Senior Paralegal MYE regarding settlement dialogue with Opposing Counsel and rescheduling Client's deposition in light of ongoing settlement dialogue.	675	67.5	Lenden Webb	
5/20/25	0.1	Office conference between Attorney LFW, Attorney KEC, and Senior Paralegal MYE regarding Client confirming he is remaining as class representative to recover enhancement award.	675	67.5	Lenden Webb	
5/20/25	0.1	Office conference between Attorney LFW, Attorney KEC, and Senior Paralegal MYE regarding Client confirming he is remaining as class representative to recover enhancement award.	675	67.5	Lenden Webb	
5/20/25	0.3	Zoom conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE and Client to confirm Client is remaining as class representative and action to proceed settling the class claims.	275	82.5	Morgan Edgar	
5/20/25	0.3	Zoom conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE and Client to confirm Client is remaining as class representative and action to proceed settling the class claims.	275	82.5	Lenden Webb	
5/20/25	0.2	Conference between Attorney LFW and Attorney KEC regarding deposition and settlement.	475	95	Katherine Cervantes	
5/20/25	0.2	Receipt and review of email correspondence from opposing counsel regarding deposition and draft response regarding same.	475	95	Katherine Cervantes	
5/20/25	0.4	Zoom conference between Attorney KEC, Senior Paralegal MYE, and Client regarding ongoing settlement dialogue with defense and available option to substitute Client out as class representative to proceed with individual claims.	475	190	Katherine Cervantes	
5/20/25	0.3	Zoom conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE and Client to confirm Client is remaining as class representative and action to proceed settling the class claims.	675	202.5	Katherine Cervantes	
5/20/25	0.5	Receipt and review of email correspondence from client regarding settlement and class action responsibility, and draft response regarding same.	475	237.5	Katherine Cervantes	
5/21/25	0.2	Receipt and organization of Second Notice of Deposition - David Mejia, save to client file, and draft of internal memo regarding the same.	135	27	Kelley Kilgore	
5/21/25	0.1	Receipt and review of email correspondence from Opposing Counsel requesting extension of time to respond to discovery requests.	275	27.5	Morgan Edgar	
5/21/25	0.1	Receipt and review of Defendant's Second Notice of Deposition of Plaintiff David Mejia and Request for Production of Documents.	275	27.5	Morgan Edgar	
5/21/25	0.2	Receipt and review of text correspondence from witness Moreaux regarding suggestion to conduct initial intake with Armstrong. Draft of text correspondence to Moreaux regarding request for any contact information for Armstrong. Receipt and review of text correspondence from Moreaux regarding information on Armstrong passing the Bar Exam and strategy to possibly look through state bar's attorney search. Note the same.	150	30	Karla Roman	
5/21/25	0.1	Receipt and review of internal memo regarding engagement letter and declaration for Kristen Moreaux.	475	47.5	Katherine Cervantes	
5/21/25	0.1	Receipt and review of email correspondence from opposing counsel regarding discovery extension and draft response regarding same.	475	47.5	Katherine Cervantes	
5/21/25	0.1	Draft internal memo to file regarding inquiry into whether the date in the Second Notice of Deposition of Plaintiff was approved by Client.	675	67.5	Lenden Webb	
5/22/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding service of Second Notice of Deposition of Class Representative.	150	15	Karla Roman	
5/22/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding Zoom credentials for Client's seconded amended deposition notice taken by Defendant.	275	27.5	Morgan Edgar	

5/22/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding confirmation of circulating new dates to conduct Client's deposition.	275	27.5	Morgan Edgar
5/22/25	0.1	Receipt and review of email correspondence from opposing counsel regarding availability.	475	47.5	Katherine Cervantes
5/22/25	0.2	Draft email correspondence to opposing counsel regarding deposition date and unavailability.	475	95	Katherine Cervantes
5/28/25	0.1	Receipt and review of internal memo regarding granted extension request. Update cross-calendar for Opposing Counsel deadline to provide responses to set four discovery requests.	150	15	Karla Roman
5/28/25	0.1	Draft email correspondence to Client to confirm availability for Opposing Counsel to conduct Client's remote deposition.	275	27.5	Morgan Edgar
5/28/25	0.1	Receipt and review of email correspondence from Client confirming dates of availability for Opposing Counsel to conduct deposition.	275	27.5	Morgan Edgar
5/28/25	0.1	Receipt and review of memo re OC Deadline to Respond to S4 requests.	475	47.5	Katherine Cervantes
5/28/25	0.2	Draft internal memo to update deadline for defendants discovery responses.	475	95	Katherine Cervantes
5/29/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Legal Assistant KJR regarding case status update and action to serve deposition objections and deposition notices.	150	15	Karla Roman
5/29/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Legal Assistant KJR regarding case status update and action to serve deposition objections and deposition notices.	275	27.5	Morgan Edgar
5/29/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Legal Assistant KJR regarding case status update and action to serve deposition objections and deposition notices.	475	47.5	Katherine Cervantes
5/29/25	0.2	Draft email correspondence.	275	55	Morgan Edgar
5/29/25	0.2	Receipt and review of email correspondence from client regarding deposition availability, and draft memo regarding action to email opposing counsel regarding same.	475	95	Katherine Cervantes
5/29/25	0.2	Revise Notice of Deposition - David Mejia - Objection - Second Notice.	475	95	Katherine Cervantes
5/30/25	0.1	Calculate and cross-calendar deadline for Opposing Counsel to respond to 998 Offer.	150	15	Karla Roman
5/30/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding Opposing Counsel taking Client's deposition off calendar and action to draft email correspondence to Client regarding the same.	275	27.5	Morgan Edgar
5/30/25	0.1	Draft email correspondence to Client confirming Opposition Counsel took client's deposition off calendar. Further confirm that new dates and times are forthcoming.	275	27.5	Morgan Edgar
5/30/25	0.1	Receipt and review of internal memo from Case Staffer regarding confirmation of deadline for Opposing Counsel to accept 998 Offer.	275	27.5	Morgan Edgar
5/30/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding Opposing Counsel taking Client's deposition off calendar and action to draft email correspondence to Client regarding the same.	475	47.5	Katherine Cervantes
5/30/25	0.1	Receipt and review of email correspondence from client regarding deposition availability.	475	47.5	Katherine Cervantes
5/30/25	0.1	receipt and review of memo regarding deadline to accept 998 offer.	475	47.5	Katherine Cervantes
5/30/25	0.2	Telephone conference with opposing counsel regarding the status of the depositions.	475	95	Katherine Cervantes
5/30/25	0.2	Telephone conference between Opposing Counsel and Attorney KEC regarding depositions and settlement.	475	95	Katherine Cervantes
6/4/25	0.2	Draft of email correspondence to Court Reporting Company requesting court reporter for taking of Deposition of Person Most Qualified and providing relevant information regarding the same.	150	30	Karla Roman
6/5/25	0.1	Receipt and review of email correspondence from potential witness Lema regarding no interest in being witness. Update class list.	150	15	Karla Roman
6/5/25	0.5	Draft of 30 email correspondences to potential witnesses requesting callback to conduct initial intake regarding experience working at SCRAM of California, Inc.	150	75	Karla Roman
6/5/25	0.2	Draft email correspondence regarding taking PMQ deposition of calendar.	475	95	Katherine Cervantes
6/6/25	0.1	Receipt and review of internal memo regarding tentative deposition of Person Most Knowledgeable being taken off calendar.	150	15	Karla Roman
6/6/25	0.1	Receipt and review of internal memo from Case Staffer regarding deposition of Defendant's Person Most Qualified taken off calendar.	275	27.5	Morgan Edgar
6/9/25	0.1	Receipt and review of email correspondence from Opposing Counsel confirming no production of Person Most Knowledgeable for noticed deposition on June 11. Update calendar.	150	15	Karla Roman
6/9/25	0.2	Receipt and review of email correspondence from opposing counsel regarding settlement of claims, and review Attorney LFW response regarding same.	475	95	Katherine Cervantes
6/10/25	0.1	Receipt and review of email correspondence from Opposing Counsel offering \$100,000 for settlement and dismissal of PAGA claims.	275	27.5	Morgan Edgar

6/10/25	0.1	Draft of email correspondence to Opposing Counsel regarding impass in settlement negotiation, and agreeable dates for the deposition of SCRAM's Person Most Qualified.	675	67.5	Lenden Webb	
6/10/25	0.1	Draft of email correspondence to Opposing Counsel regarding request to draft Settlement Agreement.	675	67.5	Lenden Webb	
6/11/25	0.2	Receipt and review of email correspondence to opposing counsel regarding acceptance of settlement.	475	95	Katherine Cervantes	
6/16/25	0.1	Receipt and review of internal memo from Case Staffer regarding action share proposed Settlement Agreement and Release with Co-Counsel.	275	27.5	Morgan Edgar	
6/16/25	0.2	Receipt and review of email correspondence from Opposing Counsel serving proposed Settlement Agreement and Release. Receipt and review of the same.	275	55	Morgan Edgar	
6/16/25	0.2	Receipt and review of MOU.	475	95	Katherine Cervantes	
6/17/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Legal Assistant KJR regarding status of witness outreach, engaged witnesses, and declarations.	150	15	Karla Roman	
6/17/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Legal Assistant KJR regarding status of witness outreach, engaged witnesses, and declarations.	150	15	Katherine Cervantes	
6/17/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Legal Assistant KJR regarding status of witness outreach, engaged witnesses, and declarations.	275	27.5	Morgan Edgar	
6/17/25	0.2	Manage and mark completed tasks and organize correspondence into office folders, review flagged tasks and correspondence, unflag completed tasks, and flagging or leaving outstanding action points.	475	95	Katherine Cervantes	
6/18/25	0.2	Telephone conference between Legal Assistant KJR and witness Futrell regarding case status update.	150	30	Karla Roman	
6/25/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding case status update and action to pause on class action witness calls.	110	11	Office Webb	
6/25/25	0.1	Office conference between Legal Assistant KJR and Case Assistant GIS regarding case status update and action to pause on class action witness calls.	150	15	Karla Roman	
6/25/25	0.2	Receipt and review of internal memo regarding case management conference hearing date.	475	95	Katherine Cervantes	
6/25/25	0.2	Receipt and review of internal memo regarding san mateo county case management conference.	475	95	Katherine Cervantes	
6/30/25	0.2	Manage and mark completed tasks and organize correspondence into office folders, review flagged tasks and correspondence, unflag completed tasks, and flagging or leaving outstanding action points.	475	95	Katherine Cervantes	
7/2/25	0.2	Draft email correspondence to opposing counsel with redline copy of memorandum of understanding.	495	99	Katherine Cervantes	
7/2/25	0.7	Redline Memorandum of Understanding.	495	346.5	Katherine Cervantes	
7/14/25	0.1	Draft internal memo to file regarding action to forward any correspondence from witnesses to Case Staffers.	150	15	Karla Roman	
7/14/25	0.1	Receipt and review of email correspondence and text correspondence from witness Moreaux regarding request for status update.	150	15	Karla Roman	
7/14/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding circulation of proposed edits and revisions on draft Memorandum of Understanding. Subsequently review the same.	295	29.5	Morgan Edgar	
7/14/25	0.2	Telephone conference between Paralegal KJR and witness Moreaux regarding case status updates. Draft internal memo to file regarding the same.	150	30	Karla Roman	
7/16/25	0.1	Draft internal memo to file regarding confirmation of witness Moreaux Engagement Letter and Declaration in Box.	150	15	Karla Roman	
7/16/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Paralegal KJR regarding class administrator clause in Settlement Agreement and future steps relating to settlement for class members.	150	15	Karla Roman	
7/16/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Paralegal KJR regarding class administrator clause in Settlement Agreement and future steps relating to settlement for class members.	295	29.5	Morgan Edgar	
7/16/25	0.1	Receipt and review of internal memo regarding Moreaux and draft response regarding same.	495	49.5	Katherine Cervantes	
7/16/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Paralegal KJR regarding class administrator clause in Settlement Agreement and future steps relating to settlement for class members.	495	49.5	Katherine Cervantes	
7/16/25	0.2	Receipt and review of email correspondence from opposing counsel regarding revisions to settlement agreement.	495	99	Katherine Cervantes	
7/22/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE, Paralegal KJR regarding case status update and action to finalize Settlement Agreement before forwarding to Opposing Counsel.	275	27.5	Karla Roman	

7/22/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE, Paralegal KJR regarding case status update and action to finalize Settlement Agreement before forwarding to Opposing Counsel.	295	29.5	Morgan Edgar	
7/22/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE, Paralegal KJR regarding case status update and action to finalize Settlement Agreement before forwarding to Opposing Counsel.	495	49.5	Katherine Cervantes	
7/22/25	0.1	Office conference between Attorney LFW, Attorney KEC, Senior Paralegal MYE, Paralegal KJR regarding case status update and action to finalize Settlement Agreement before forwarding to Opposing Counsel.	675	67.5	Lenden Webb	
7/23/25	0.1	Draft of email correspondence to Client via DocuSign regarding request for review and signature of Memorandum of Understanding.	150	15	Karla Roman	
7/23/25	0.1	Draft internal memo to file regarding total amount of Engagement Letters and Declarations signed by witnesses.	150	15	Karla Roman	
7/23/25	0.1	Receipt and review of internal memo from Case Staffer regarding deadline to file Joint Case Management Statement.	295	29.5	Morgan Edgar	
7/23/25	0.1	Receipt and review of email correspondence from Case Staffer to Co-Counsel regarding notice of reaching settlement.	295	29.5	Morgan Edgar	
7/23/25	0.1	Receipt and review of internal memo from Case Staffer regarding confirmation that Settlement Agreement and Release was sent to client via DocuSign for signature.	295	29.5	Morgan Edgar	
7/23/25	0.2	Revise and approve for signature.	495	99	Katherine Cervantes	
7/23/25	0.4	Draft email correspondence to co-counsel regarding acceptance of settlement agreement rationale.	495	198	Katherine Cervantes	
7/24/25	0.1	Receipt and review of email correspondences between Case Staffer and Co Counsel regarding reasoning behind drafting and signing of Memorandum of Understanding.	150	15	Karla Roman	
7/24/25	0.1	Receipt and review of cross-calendar for action to draft and file Joint Case Management Statement. Review date and approve.	150	15	Karla Roman	
7/24/25	0.1	Receipt and review of internal memo from Case Staffer regarding confirmation that Clients have entered into a settlement agreement, and are awaiting execution of memorandum of understanding. Parties will request a continue of the Case Management Conference as a motion for preliminary approval of the settlement agreement is forthcoming.	295	29.5	Morgan Edgar	
7/24/25	0.2	Receipt and review of email correspondence from co-counsel, regarding acceptance of MOU.	495	99	Katherine Cervantes	
7/28/25	0.2	Receipt of, file save, and sent to Case Staffers partially executed Memorandum of Understanding. Draft of email correspondence to Client via DocuSign regarding the same.	150	30	Karla Roman	
7/28/25	0.2	Receipt and review of email correspondence from opposing counsel with MOU, draft internal memo to contact client regarding same.	495	99	Katherine Cervantes	
7/29/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to further correspond with Client regarding request for review and signature of Memorandum of Understanding.	150	15	Karla Roman	
7/29/25	0.1	Draft of text correspondence to Client regarding request for review and signature of DocuSign envelope containing Memorandum of Understanding.	150	15	Karla Roman	
7/29/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to further correspond with Client regarding request for review and signature of Memorandum of Understanding.	295	29.5	Morgan Edgar	
7/29/25	0.2	Receipt and review of email correspondence from opposing counsel with signatures of MOU, action to follow up with client.	495	99	Katherine Cervantes	
7/30/25	0.1	Draft internal memo to file regarding action to telephone conference with Client to request signature of DocuSign envelope with Memorandum of Understanding.	150	15	Karla Roman	
7/30/25	0.1	Receipt of, file save, and sent to Case Staffers Client executed copy of Memorandum of Understanding.	150	15	Karla Roman	
7/30/25	0.4	(PCD 0.2) Review previous CMC statements. Draft CMC statement. Draft internal memo to file regarding review of same.	150	60	Jocelyn Arteaga	
7/30/25	0.4	Telephone conference between Paralegal KJR and Class Representative regarding review of Memorandum of Understanding.	150	60	Karla Roman	
7/31/25	0.1	Draft of email correspondence to Opposing Counsel regarding copy of Memorandum of Understanding executed by Client and Case Staffer.	150	15	Karla Roman	
7/31/25	0.1	Draft of email correspondence to Co Counsel regarding request for review and signature of Memorandum of Understanding.	150	15	Karla Roman	
7/31/25	0.1	Receipt and review of partially executed Memorandum of Understanding. Subsequently draft memo to file regarding action to circulate for Co-Counsel's signature.	295	29.5	Morgan Edgar	
8/1/25	0.1	Receipt and review of internal memo from Case Staffer regarding deadline to follow-up with Opposing Counsel for status of long form settlement agreement.	295	29.5	Morgan Edgar	
8/1/25	0.2	Revise Joint Case Management Conference Statement.	495	99	Katherine Cervantes	
8/1/25	0.2	Draft internal memo regarding MOU.	495	99	Katherine Cervantes	
8/4/25	0.1	Office conference between Office Coordinator/Legal Assistant JVA and Paralegal KJR regarding status of Memorandum of Understanding for drafting of Case Management Conference Statement.	150	15	Karla Roman	

8/4/25	0.1	Office conference between Office Coordinator/Legal Assistant JVA and Paralegal KJR regarding status of Memorandum of Understanding for drafting of Case Management Conference Statement.	150	15	Jocelyn Arteaga
8/4/25	0.1	Receipt and review of internal memo from Case Staffer regarding prepared draft of Case Management Conference Statement.	295	29.5	Morgan Edgar
8/4/25	0.3	Draft email correspondence to co-counsel regarding escalator clause.	495	148.5	Katherine Cervantes
8/5/25	0.1	Receipt and review of email correspondence from Co-Counsel regarding signed Memorandum of Understanding, file save, and sent to Case Staffers. Draft of email correspondence to Opposing Counsel regarding request for review and signature of the same.	150	15	Karla Roman
8/5/25	0.1	Receipt and review of fully executed Memorandum of Understanding.	295	29.5	Morgan Edgar
8/7/25	0.1	Cross-calendar action to correspond with Opposing Counsel regarding draft of long form settlement agreement.	150	15	Karla Roman
8/7/25	0.1	Receipt and review of email correspondence from Case Staffer to Opposing Counsel regarding request for draft of the long form settlement agreement.	295	29.5	Morgan Edgar
8/7/25	0.2	Draft email correspondence to opposing counsel regarding long form settlement agreement.	495	99	Katherine Cervantes
8/7/25	0.2	Receipt and review of internal memo regarding Email OC re Long Form Settlement Agreement.	495	99	Katherine Cervantes
8/11/25	0.2	Manage and mark completed tasks and organize correspondence into office folders, review flagged tasks and correspondence, unflag completed tasks, and flagging or leaving outstanding action points.	495	99	Katherine Cervantes
8/13/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding case status update and action to telephone conference with Opposing Counsel regarding signing of Memorandum of Understanding.	150	15	Karla Roman
8/13/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding case status update and action to telephone conference with Opposing Counsel regarding signing of Memorandum of Understanding.	295	29.5	Morgan Edgar
8/13/25	0.1	Receipt and review of internal memo from Case Staffer regarding deadline to file Joint Case Management Conference Statement.	295	29.5	Morgan Edgar
8/14/25	0.1	Draft internal memo to file regarding confirmation of multiple attempts to request signature of Memorandum of Understanding from Opposing Counsel.	150	15	Karla Roman
8/14/25	0.1	Draft of email correspondence to Opposing Counsel regarding Joint CMC statement.	150	15	Jocelyn Arteaga
8/14/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding approval of proposed Joint Case Management Conference Statement.	295	29.5	Morgan Edgar
8/14/25	0.2	Receipt and review of internal memo regarding case management statement, and draft response regarding same.	495	99	Katherine Cervantes
8/15/25	0.1	Draft internal memo to file regarding word processing version of Joint Case Management Conference Statement.	150	15	Karla Roman
8/15/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding proposed finalized draft of Case Management Conference Statement requesting Motion for Class Certification hearing date and time.	295	29.5	Morgan Edgar
8/15/25	0.2	Receipt and review of email correspondence from opposing counsel regarding joint case management conference statement, and draft response regarding same.	495	99	Katherine Cervantes
8/18/25	0.1	Draft internal memo to file regarding request for approval of Opposing Counsel track changes to Joint Case Management Statement.	150	15	Karla Roman
8/19/25	0.2	Update draft of Joint Case Management Conference Statement with Opposing Counsel's proposed edits. Draft of email correspondence to Opposing Counsel regarding request for review and signature of updated Joint Case Management Conference Statement and partially executed Memorandum of Understanding.	150	30	Karla Roman
8/19/25	0.2	Receipt and review of email correspondence from opposing counsel regarding joint cmc statement, and review proposed changes, and draft internal memo regarding same.	495	99	Katherine Cervantes
8/22/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to correspond with Opposing Counsel regarding filing of Joint Case Management Statement.	150	15	Karla Roman
8/22/25	0.1	Draft of email correspondence to Opposing Counsel regarding request for signed copy of Case Management Conference Statement and filing of the same.	150	15	Karla Roman
8/22/25	0.1	Office conference between Paralegal KJR and Office Coordinator/Legal Assistant JVA regarding action to file and serve Joint Case Management Statement.	150	15	Karla Roman
8/22/25	0.1	Office conference between Paralegal KJR and Office Coordinator/Legal Assistant JVA regarding action to file and serve Joint Case Management Statement.	150	15	Jocelyn Arteaga
8/22/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding confirmation of their action to file.	150	15	Karla Roman

8/22/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to correspond with Opposing Counsel regarding filing of Joint Case Management Statement.	295	29.5	Morgan Edgar	
8/22/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding action to file Joint Case Management Conference Statement without Opposing Counsel's signature.	295	29.5	Morgan Edgar	
8/22/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding fully executed filed Case Management Conference Statement and fully executed MOU.	295	29.5	Morgan Edgar	
8/22/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding action to file Joint Case Management Conference Statement without Opposing Counsel's signature.	495	49.5	Katherine Cervantes	
8/25/25	0.2	Receipt of, file save, and sent to Case Staffers fully executed Memorandum of Understanding and executed and filed Case Management Statement.	150	30	Karla Roman	
8/25/25	0.2	Receipt and review of Joint Case Management Statement.	495	99	Katherine Cervantes	
8/25/25	0.2	Receipt and review of email correspondence regarding MOU execution.	495	99	Katherine Cervantes	
8/27/25	0.1	(NB) Telephone conference between Office Assistant SAM and Department 24 Courtroom G regarding assistance and clarification to join Courtroom J for Case Management Conference. Voicemail left with Department 24 Courtroom G regarding the same.	135	13.5	Samantha Silva	
8/27/25	0.1	(NB) Telephone conference between Office Assistant SAM and Department 28 Courtroom I regarding assistance and clarification to join Courtroom J for Case Management Conference. Voicemail left with Department 28 Courtroom I regarding the same.	135	13.5	Samantha Silva	
8/27/25	0.1	(NB) Office conference between RNK, Paralegal KJR and Office Assistant SAM regarding how to join Courtroom J for Case Management Conference.	135	13.5	Samantha Silva	
8/27/25	0.1	Office conference between Paralegal KJR and Office Coordinator/Legal Assistant JVA regarding action to telephone conference with Court Clerk regarding request to allow Case Staffer into Zoom meeting for Case Management Conference.	150	15	Karla Roman	
8/27/25	0.1	Office conference between Paralegal KJR and Office Coordinator/Legal Assistant JVA regarding action to telephone conference with Court Clerk regarding request to allow Case Staffer into Zoom meeting for Case Management Conference.	150	15	Jocelyn Arteaga	
8/27/25	0.1	Office conference between Attorney RNK and Paralegal KJR regarding no attendance at Case Management Conference due to Court's technical difficulties.	150	15	Karla Roman	
8/27/25	0.1	Office conference between Attorney RNK and Paralegal KJR regarding no attendance at Case Management Conference due to Court's technical difficulties.	450	45	Raza Khan	
8/27/25	0.4	Troubleshoot Case Staffer attendance at Case Management Conference.	150	60	Karla Roman	
8/27/25	0.2	Review of court docket regarding Case Management Conference.	495	99	Katherine Cervantes	
8/27/25	1.8	Attempt to attend Case Management Conference.	450	810	Raza Khan	
8/28/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to review Register of Action for reserved hearing date for Motion to Approve PAGA.	150	15	Karla Roman	
8/28/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to review Register of Action for reserved hearing date for Motion to Approve PAGA.	295	29.5	Morgan Edgar	
8/28/25	0.1	Receipt and review of email correspondent from department 11 of San Mateo Superior Court regarding setting of motion to approve class settlement.	295	29.5	Morgan Edgar	
8/28/25	0.1	Receipt and review of Case Management Conference Minute Order regarding appearances and notification to the Court that the case has settled.	295	29.5	Morgan Edgar	
8/28/25	0.1	Receipt and review of internal memo from Case Staffer regarding draft of calendar entries for deadlines for filing moving papers for motion for approval of class settlement.	295	29.5	Morgan Edgar	
8/28/25	0.2	Review of Register of Actions for Court's Minute Order on Case Management Conference held on August 27, 2025. File save and sent to Case Staffers. Draft internal memo to file regarding action to contact Court to request date for Motion for Conditional Approval of PAGA Settlement.	150	30	Karla Roman	
8/28/25	0.2	Calendar hearing on Motion for Conditional Approval of PAGA Settlement. Cross-calendar deadlines for moving papers, opposition, and reply.	150	30	Karla Roman	
8/28/25	0.2	Telephone conference between Paralegal KJR and Witness Moreaux regarding case status update, Memorandum of Understanding, and procedure for filing.	150	30	Karla Roman	

8/28/25	0.1	Receipt and review of email correspondence from Department 11 of the Superior Court, County of San Mateo regarding next available date for the Motion for Approval. Draft of email correspondence to Department 11 regarding action for office to respond promptly with office's availability to accommodate the given date.	675	67.5	Lenden Webb
9/3/25	0.2	Receipt and review of Case Management Conference - 2025 08 Aug 27 - Minute Order, action to obtain date.	495	99	Katherine Cervantes
9/3/25	0.2	Receipt and review of email correspondence from court regarding motion for approval date and draft internal memo regarding same.	495	99	Katherine Cervantes
9/3/25	0.2	Receipt and review of internal memo regarding motion for approval deadlines.	495	99	Katherine Cervantes
9/10/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding action to email Opposing Counsel for Long Form Settlement Agreement.	295	29.5	Morgan Edgar
9/10/25	0.1	Receipt and review of email correspondence from Case Staffer to Opposing Counsel requesting long form settlement agreement.	295	29.5	Morgan Edgar
9/10/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding action to email Opposing Counsel for Long Form Settlement Agreement.	495	49.5	Katherine Cervantes
9/10/25	0.2	Review of settlement agreement attorney fees and draft correspondence to Attorney LFW re same.	495	99	Katherine Cervantes
9/10/25	0.2	Draft email correspondence to opposing counsel regarding status of long form settlement agreement.	495	99	Katherine Cervantes
9/30/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding case updates and status of long form settlement agreement.	210	21	Karla Roman
9/30/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding case updates and status of long form settlement agreement.	295	29.5	Morgan Edgar
10/6/25	0.1	Receipt and review of internal memo from Case Staffer regarding action to draft Joint Case Management Conference Statement.	295	29.5	Morgan Edgar
10/6/25	0.2	Draft internal memo to file regarding case status update and request to draft Joint Case Management Conference Statement.	210	42	Karla Roman
10/7/25	0.1	Cross-calendar deadline to file Joint Case Management Conference Statement.	210	21	Karla Roman
10/7/25	0.1	Draft internal memo to file regarding email correspondence with Opposing Counsel and action to further correspond to confirm status of long form settlement agreement.	210	21	Karla Roman
10/7/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding confirmation of draft of long form settlement agreement.	295	29.5	Morgan Edgar
10/7/25	0.1	Receipt and review of internal memo from Case Staffer regarding dismissal of PAGA claims and action to draft motion for court approval of the same.	295	29.5	Morgan Edgar
10/7/25	0.3	(PCD 0.1) Review client file and court docket to confirm hearing scheduled on October 30, 2025. Draft Joint Case Management Statement.	175	52.5	Jocelyn Arteaga
10/7/25	0.2	Receipt and review of internal memo regarding case management statement.	495	99	Katherine Cervantes
10/7/25	0.2	Review of case management statement and draft response regarding same.	495	99	Katherine Cervantes
10/7/25	0.2	Draft email correspondence to opposing counsel regarding the status of the long form settlement agreement.	495	99	Katherine Cervantes
10/8/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to draft shell for Request for Dismissal of PAGA.	210	21	Karla Roman
10/8/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to draft shell for Request for Dismissal of PAGA.	295	29.5	Morgan Edgar
10/8/25	0.2	Receipt and review of Cal. Rule of Court 3.770 for drafting Dismissal of PAGA Complaint.	295	59	Morgan Edgar
10/8/25	0.2	Receipt and review of email correspondence from opposing counsel regarding status of settlement agreement, draft response regarding same.	495	99	Katherine Cervantes
10/8/25	0.5	Draft shells for Request for Dismissal of PAGA Action.	210	105	Karla Roman
10/9/25	0.2	Receipt and review of internal memo from Case Staffer regarding dismissal of PAGA actions pursuant to Labor Code section 2699(1)(2) which requires court approval for any settlement of dismissal of a PAGA action and action to confirm with Orange County Superior Court if Court will accept Stipulation or a Noticed Motion for Court Approval.	295	59	Morgan Edgar
10/9/25	0.4	Conduct research regarding California Rule of Court 3.770, which applies only to class actions and Labor Code § 2699(l)(2).	495	198	Katherine Cervantes
10/13/25	0.1	Office conference between Attorney LFW, Senior Paralegal MYE, Paralegal KJR regarding case status updates and dismissal of PAGA claims.	210	21	Karla Roman
10/13/25	0.1	Office conference between Attorney LFW, Senior Paralegal MYE, Paralegal KJR regarding case status updates and dismissal of PAGA claims.	295	29.5	Morgan Edgar
10/13/25	0.1	Office conference between Attorney LFW, Senior Paralegal MYE, Paralegal KJR regarding case status updates and dismissal of PAGA claims.	675	67.5	Lenden Webb
10/13/25	0.2	Receipt and review of internal memo regarding dismissal of PAGA claims from Senior Paralegal MYE, draft response regarding same.	495	99	Katherine Cervantes
10/13/25	0.4	Receipt and review of Local Rules for department CX 102 for dismissal of PAGA action. Draft internal memo to Case Staffer regarding the same.	295	118	Morgan Edgar

10/14/25	0.1	Telephone conference between Senior Paralegal MYE and Orange County Judicial Assistant in Department CX 102 requires a noticed motion to dismiss PAGA Complaint.	295	29.5	Morgan Edgar	
10/15/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding filing Motion for Dismissal of PAGA claims after execution of long form settlement agreement.	295	29.5	Morgan Edgar	
10/15/25	0.1	Office conference between Attorney KEC and Senior Paralegal MYE regarding filing Motion for Dismissal of PAGA claims after execution of long form settlement agreement.	495	49.5	Katherine Cervantes	
10/15/25	0.2	Execute edits and revisions on draft PAGA CMC statement for Case Staffer review and to circulate to Opposing Counsel.	295	59	Morgan Edgar	
10/15/25	0.2	Receipt and review of email correspondence from Opposing Counsel regarding draft Joint Case Management Statement for filing in Orange County Superior Court for PAGA action. Subsequently receipt and review of the same and draft internal memo to Case Staffers regarding action to circulate CMC Statement for signature and filing.	295	59	Morgan Edgar	
10/15/25	0.1	Receipt and review of proposed Case Management Conference Statements from office and Opposing Counsel. Draft internal memo to file regarding agreement to circulate for signature.	675	67.5	Lenden Webb	
10/15/25	0.2	Receipt and review of internal memo from MYE regarding action filing of Motion for PAGA Dismissal.	495	99	Katherine Cervantes	
10/16/25	0.1	Receipt and review of opposing Counsel draft of Joint Case Management Conference Statement. Receipt and review of internal memo regarding approval of the same. PDF, execute, and draft email correspondence to Opposing Counsel regarding executed copy of the same.	210	21	Karla Roman	
10/16/25	0.1	Research labor code regarding dismissal of PAGA Claims.	210	21	Karla Roman	
10/16/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding circulating proposed long form settlement agreement.	295	29.5	Morgan Edgar	
10/17/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding long form Settlement Agreement draft and file save.	210	21	Karla Roman	
10/17/25	0.1	Draft internal memo to Case Staff regarding task to save exhibit to Box.	675	67.5	Lenden Webb	
10/20/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to draft shells for motion pursuant to Labor Code § 2699(l)(2) for court approval of dismissal of PAGA action.	210	21	Karla Roman	
10/20/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to draft shells for motion pursuant to Labor Code § 2699(l)(2) for court approval of dismissal of PAGA action.	295	29.5	Morgan Edgar	
10/21/25	0.3	Draft shells for Motion for Dismissal pursuant to labor code 2699.	210	63	Karla Roman	
10/21/25	0.2	Receipt and review of internal memo regarding Motion to Enforce and draft response regarding same.	495	99	Katherine Cervantes	
10/22/25	0.1	File and serve Joint Case Management Statement.	175	17.5	Jocelyn Arteaga	
10/22/25	0.1	Draft internal memo to file regarding action to file and serve Joint Case Management Conference Statement.	210	21	Karla Roman	
10/22/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding confirmation of Opposing Counsel failing to file joint case management statement.	295	29.5	Morgan Edgar	
10/22/25	0.1	Draft internal memo to Case Staffer regarding action to contact Opposing Counsel and Opposing Counsel's paralegal regarding fully executed Joint Case Management Conference Statement to proceed filing.	295	29.5	Morgan Edgar	
10/22/25	0.1	Receipt and review of email correspondence from Opposing Counsel requesting status on review of the long form Settlement Agreement.	295	29.5	Morgan Edgar	
10/22/25	0.2	Office conference between Senior Paralegal MYE and Paralegal KJR regarding confirmation of Opposing Counsel failing to file joint case management statement. Voicemail left with Opposing Counsel regarding the same. Draft internal memo to file regarding completed action.	210	42	Karla Roman	
10/22/25	0.2	Draft of email correspondence to Opposing Counsel regarding request for fully executed copy of the same.	495	99	Katherine Cervantes	
10/22/25	0.2	Revise Case Management Statement.	495	99	Katherine Cervantes	
10/22/25	0.2	Receipt and review of email correspondence from opposing counsel regarding draft case management conference statement.	495	99	Katherine Cervantes	
10/23/25	0.2	Receipt and organization of Joint CMC Statement 2025 10 Oct 30, save to client file, and draft of internal memo regarding the same.	150	30	Kelley Kilgore	
10/23/25	0.2	Receipt and review of internal memo regarding status of case management statement.	495	99	Katherine Cervantes	
10/23/25	0.2	Receipt and review of email correspondence from opposing counsel regarding the long form settlement agreement, draft response regarding same.	495	99	Katherine Cervantes	
10/23/25	0.2	Receipt and review of email correspondence with final execution of Joint Case Management Statement.	495	99	Katherine Cervantes	
10/28/25	0.2	Receipt and review of internal memo regarding Joint CMC Statement 2025 10 Oct 30 – FILED.	495	99	Katherine Cervantes	
10/29/25	0.2	Receipt and review of email correspondence from court regarding continuance of case management conference, draft response regarding same.	495	99	Katherine Cervantes	
10/30/25	0.1	Receipt and review of set Case Management Conference to draft Motion to Dismiss PAGA Complaint.	295	29.5	Morgan Edgar	

10/30/25	0.2	Receipt and review of email correspondence from Clerk regarding notice of continued Case Management Conference. Update calendar. Calculate and cross-calendar deadline to file Joint Case Management Conference Statement. Draft internal memo to file regarding completed action.	210	42	Karla Roman	
10/30/25	0.2	Receipt and review of internal memo regarding case management conference.	495	99	Katherine Cervantes	
10/30/25	0.2	Draft internal memo regarding long form settlement agreement.	495	99	Katherine Cervantes	
10/30/25	0.6	Revise long form settlement agreement.	495	297	Katherine Cervantes	
10/31/25	0.1	Receipt of, save to client file and sent to case staffers the Case Management Conference - Minute Order - 2025 10 Oct 29.	175	17.5	Jocelyn Arteaga	
11/3/25	0.2	Receipt and review of Case Management Conference - Minute Order - 2025 10 Oct 29.	495	99	Katherine Cervantes	
11/3/25	0.3	Conference between Attorney Attorney LFW and Attorney KEC regarding revisions to settlement agreement.	495	148.5	Katherine Cervantes	
11/3/25	0.3	Draft email correspondence to co-counsel regarding long form settlement agreement.	495	148.5	Katherine Cervantes	
11/3/25	0.7	Implement final revisions to Settlement Agreement.	495	346.5	Katherine Cervantes	
11/4/25	0.1	Receipt and review of email correspondence from Court Clerk regarding service of Minute Order for Case Management Conference. Draft internal memo to file regarding action to file save.	675	67.5	Lenden Webb	
11/4/25	0.2	Receipt and review of email correspondence from court regarding minute order for continuance of case management conference.	495	99	Katherine Cervantes	
11/11/25	0.1	Receipt and review of Notice of Reassignment for All Purposes to Hon. Mark A. McCannon.	295	29.5	Morgan Edgar	
11/11/25	0.2	Receipt and organization of Notice of Reassignment for All Purposes - Mark A. McCannon, save to client file, and draft of internal memo regarding the same.	150	30	Kelley Kilgore	
11/11/25	0.1	Receipt and review of email correspondence from San Mateo Superior Court regarding served documents November 10, 2025. Draft internal memo to file regarding action to file save the same.	675	67.5	Lenden Webb	
11/11/25	0.2	Receipt and review of email correspondence regarding notice of case reassignment.	495	99	Katherine Cervantes	
11/12/25	0.1	Receipt and review of internal memo regarding Notice of Reassignment of Department and action to not conduct research into Judge for Peremptory Challenge.	210	21	Karla Roman	
11/12/25	0.1	Receipt and review of internal memo from Case Staffer regarding no reason to disqualify or 170.6 new assignment of judge.	295	29.5	Morgan Edgar	
11/12/25	0.1	Receipt and review of Notice of Reassignment for All Purposes - Mark A. McCannon. Draft internal memo to file regarding no action needed to research new judge for a DQ/170.6.	675	67.5	Lenden Webb	
11/12/25	0.2	Receipt and review of internal memo from Attorney LFW regarding notice of case reassignment and 170.6 motion, draft response regarding same.	495	99	Katherine Cervantes	
11/18/25	0.1	Receipt and review of email correspondence from Co-Counsel confirming review of Settlement Agreement draft.	210	21	Karla Roman	
11/18/25	0.1	Receipt and review of email correspondence from Co-Counsel regarding proposed edits and revisions on Long Form Settlement Agreement.	295	29.5	Morgan Edgar	
11/18/25	0.2	Draft email correspondence to co-counsel regarding settlement agreement.	495	99	Katherine Cervantes	
11/20/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Paralegal KJR regarding case check in and action plan moving forward.	210	21	Karla Roman	
11/20/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Paralegal KJR regarding case check in and action plan moving forward.	295	29.5	Morgan Edgar	
11/20/25	0.1	Office conference between Attorney KEC, Senior Paralegal MYE, Paralegal KJR regarding case check in and action plan moving forward.	495	49.5	Katherine Cervantes	
11/20/25	0.4	Receipt and review of internal memo regarding escalator clause and draft response regarding same.	495	198	Katherine Cervantes	
11/24/25	0.2	Receipt and review of internal memo from Case Staffer regarding memorialization of case action plan to finalize long form settlement agreement and dismiss PAGA claims pursuant to Cal. Labor Code section 2699(1)(2).	295	59	Morgan Edgar	
11/24/25	1.5	Draft internal case status update.	495	742.5	Katherine Cervantes	
12/2/25	0.2	Draft of email correspondence to Co-Counsel regarding follow up on previous request for review and approval of Settlement Agreement draft.	210	42	Karla Roman	
12/8/25	0.1	Office conference between Attorney LFW, Senior Paralegal MYE, Paralegal KJR regarding action to correspond with Co-Counsel to obtain signatures on long form Settlement Agreement.	210	21	Karla Roman	
12/8/25	0.1	Office conference between Attorney LFW, Senior Paralegal MYE, Paralegal Paralegal KJR regarding action to correspond with Co-Counsel to obtain signatures on long form Settlement Agreement.	295	29.5	Morgan Edgar	
12/8/25	0.1	Office conference between Attorney LFW, Senior Paralegal MYE, Paralegal Paralegal KJR regarding action to correspond with Co-Counsel to obtain signatures on long form Settlement Agreement.	675	67.5	Lenden Webb	

12/12/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to draft shells for dismissal of PAGA claims in matter.	210	21	Karla Roman	
12/12/25	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to draft shells for dismissal of PAGA claims in matter.	295	29.5	Morgan Edgar	
12/15/25	0.1	Receipt and review of email correspondence from Case Staffer to Opposing Counsel regarding request for \$51,000 as per Settlement Agreement.	210	21	Karla Roman	
12/16/25	0.1	Receipt and review of email correspondence from Case Staffer to Opposing Counsel regarding status on execution of Long Form Settlement Agreement.	295	29.5	Morgan Edgar	
12/16/25	0.2	Draft internal memo to file regarding proposed email correspondence to Opposing Counsel regarding request for review of long form Settlement Agreement and legal analysis as to viability of escalator clause.	210	42	Karla Roman	
12/16/25	0.1	Draft of email correspondence to Co Counsel regarding request for approval of long form settlement agreement.	675	67.5	Lenden Webb	
12/17/25	0.1	Receipt and review of email correspondences between Case Staffer and Opposing Counsel regarding edits to long form Settlement Agreement and Release.	210	21	Karla Roman	
12/17/25	0.1	Receipt and review of email correspondence from Opposing Counsel regarding confirmation of acknowledgment of potential issues in draft Long Form Settlement Agreement.	295	29.5	Morgan Edgar	
12/17/25	0.2	Receipt and review of email correspondence from Co-Counsel regarding potential issues in proposed Long Form Settlement Agreement. Subsequently draft DNS memorandum to Opposing Counsel regarding the same.	295	59	Morgan Edgar	
12/17/25	0.1	Draft of email correspondence to Co-Counsel regarding confirmation that office will revise the Settlement Agreement and re-circulate to counsel.	675	67.5	Lenden Webb	
12/17/25	0.1	Draft of email correspondence to Opposing Counsel regarding redlines and comments to the Settlement Agreement.	675	67.5	Lenden Webb	
12/17/25	0.1	Draft of email correspondence to Co-Counsel regarding the updated Settlement Agreement, agreed to by Opposing Counsel.	675	67.5	Lenden Webb	
12/23/25	0.1	Draft of email correspondence to Opposing Counsel regarding confirmation of proceeding with version of Settlement Agreement approved by all Counsel.	675	67.5	Lenden Webb	
12/26/25	0.1	Receipt and review of finalize draft Long Form Settlement Agreement prepared for execution of signatures.	295	29.5	Morgan Edgar	
12/30/25	0.1	Draft of email correspondence to Opposing Counsel regarding corrected long form Settlement Agreement with his edits.	675	67.5	Lenden Webb	
1/5/26	0.1	Office conference between Attorney LFW and Paralegal KJR regarding action to request bills adding up to \$34,000 in alleged hard costs expended in matter.	210	21	Lenden Webb	
1/5/26	0.1	Receipt and review of email correspondence from Co-Counsel requesting confirmation of ability to sign long form Settlement Agreement.	230	23	Karla Roman	
1/5/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to telephone conference with Clerk to obtain hearing date for Motion to Dismiss PAGA Claims.	230	23	Karla Roman	
1/5/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to telephone conference with Clerk to obtain hearing date for Motion to Dismiss PAGA Claims.	310	31	Morgan Edgar	
1/5/26	0.1	Draft internal memo to file regarding suggestion to file a stipulation and proposed order with a declaration.	675	67.5	Lenden Webb	
1/5/26	0.1	Draft of email correspondence to Co-Counsel regarding Opposing Counsel's concerns with the edits to the long form Motion for Approval.	675	67.5	Lenden Webb	
1/5/26	0.1	Draft of email correspondence to Opposing Counsel regarding receipt of concerns with edits on the Motion for Approval.	675	67.5	Lenden Webb	
1/5/26	0.1	Draft of email correspondence to Co-Counsel regarding confirmation that there are no additional hard costs, and action to communicate the total hard cost amount to Opposing Counsel.	675	67.5	Lenden Webb	
1/5/26	0.1	Draft of email correspondence to Opposing Counsel regarding non-negotiable hard costs totaling \$34,432.44.	675	67.5	Lenden Webb	
1/5/26	0.1	Draft of email correspondence to Co-Counsel regarding request for breakdown of hard costs to provide to Opposing Counsel.	675	67.5	Lenden Webb	
1/5/26	0.1	Receipt and review of Co-Counsel's breakdown of hard costs. Draft of email correspondence to Co-Counsel regarding thoughts relating to the mediation expert fee.	675	67.5	Lenden Webb	
1/5/26	0.1	Draft of email correspondence to Co-Counsel regarding breakdown of hard costs and request for additional deflative arguments to provide to Opposing Counsel if met with additional resistance regarding the same.	675	67.5	Lenden Webb	
1/5/26	0.3	Receipt and review of multiple email correspondence from Co-Counsel and Case Staffers regarding total hard costs expended and necessity for incurring the same. Office conference between Attorney LFW and Paralegal KJR regarding action to request bills adding up to \$34,000 in alleged hard costs expended in matter.	230	69	Karla Roman	

1/5/26	0.4	Review of Courts' Register of Actions for two matters. Draft internal memo to file regarding action to prepare draft of Joint Case Management Conference Statement in Orange County case. Draft internal memo to file regarding action to telephone conference with Orange Court to obtain hearing date for Motion for dismissal of the PAGA claims without prejudice pursuant to Labor Code § 2699(l)(2).	230	92	Karla Roman	
1/6/26	0.1	Receipt and review of internal memo regarding calculations of moving paper, opposition, and reply deadline regarding Motion to Dismiss hearing. Confirm accuracy.	230	23	Karla Roman	
1/6/26	0.1	Review of case deadlines and ensure cross-calendars are accurate.	230	23	Karla Roman	
1/6/26	0.1	Receipt and review of internal memo from Case Staffer regarding draft Joint Stipulation for filing in Orange Superior Court for PAGA action.	310	31	Morgan Edgar	
1/6/26	0.1	Receipt and review of internal memo from Case Staffer regarding deadlines for filing moving papers for Motion to Dismiss PAGA action in Orange Superior Court.	310	31	Morgan Edgar	
1/6/26	0.2	Draft a Joint Case Management Statement.	175	35	Jocelyn Arteaga	
1/6/26	0.2	Office conference between Paralegal KJR and Legal Assistant MEL regarding approval to reserve Motion to Dismiss hearing date. Draft internal memo to file regarding action to calculate and cross-calendar deadlines for moving papers, opposition, and reply.	230	46	Karla Roman	
1/6/26	0.1	Draft of email correspondence to Opposing Counsel regarding request for attempt to settle hard costs at \$34,432.44.	675	67.5	Lenden Webb	
1/7/26	0.1	Draft internal memo to file regarding action to sign the Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and send to Opposing Counsel for review.	675	67.5	Lenden Webb	
1/8/26	0.1	Draft internal memo to file regarding action to confirm whether hearing on Motion to Dismiss PAGA claims is still on calendar.	230	23	Karla Roman	
1/9/26	0.1	Draft internal memo to file regarding action to update cross-calendars for Motion to Dismiss PAGA.	230	23	Karla Roman	
1/9/26	0.1	Receipt and review of internal memo from Case Staffer regarding local rules of Court requiring Motion moving papers to be filed within 24 hours of reserving hearing date and time in Orange Superior Court to Dismiss PAGA claims.	310	31	Morgan Edgar	
1/14/26	0.1	Receipt and review of email correspondence from Co-Counsel requesting edit and revision on Long Form Settlement Agreement to reflect co-counsel's request lead counsel name.	310	31	Morgan Edgar	
1/14/26	0.2	Draft of email correspondence to Co-Counsel via email and DocuSign regarding request for signature on long form settlement agreement.	230	46	Karla Roman	
1/15/26	0.1	Office conference between Attorney LFW, Senior Paralegal MYE, Paralegal KJR regarding case status updates.	230	23	Karla Roman	
1/15/26	0.1	Draft internal memo to file regarding action to draft shells for Motion to Dismiss PAGA claims without prejudice pursuant to Labor Code § 2699(l)(2).	230	23	Karla Roman	
1/15/26	0.1	Edit Settlement Agreement to address Co-Counsel as additional signatory. Draft of email correspondence to Co-Counsel regarding the same.	230	23	Karla Roman	
1/15/26	0.1	Office conference between Attorney LFW, Senior Paralegal MYE, Paralegal KJR regarding case status updates.	310	31	Morgan Edgar	
1/15/26	0.1	Office conference between Attorney LFW, Senior Paralegal MYE, Paralegal KJR regarding case status updates.	675	67.5	Lenden Webb	
1/20/26	0.1	Receipt and review of internal memo regarding drafted shells for Motion to Dismiss PAGA Claims Without Prejudice.	230	23	Karla Roman	
1/20/26	0.3	Draft Shell for [Proposed] Order Granting Motion to Dismiss PAGA claims without prejudice.	150	45	Wiley Bierman	
1/21/26	0.2	Receipt and review of prepared draft pleadings of Motion to Dismiss PAGA Claims for drafting of moving papers.	310	62	Morgan Edgar	
1/22/26	0.2	Receipt and review of prepared draft Joint Case Management Conference Statement for filing in San Mateo Superior Court for class claims.	310	62	Morgan Edgar	
1/23/26	0.1	Receipt and review of email correspondence from Co-Counsel confirming circulation of partially executed Settlement Agreement and Release to Client.	310	31	Morgan Edgar	
1/23/26	0.2	Draft internal memo to file regarding action to correspond with Co-Counsel regarding request for executed Settlement Agreement. Draft of email correspondence to Co-Counsel regarding same request in advance of upcoming Case Management Conference.	230	46	Karla Roman	
1/27/26	0.1	Receipt and review of email correspondence from Co-Counsel confirming Settlement Agreement partially executed by Client.	310	31	Morgan Edgar	
1/27/26	0.2	Receipt and review of, file save, and sent to Case Staffers MejiaSCRAM Long Settlement Agreement - PARTIALLY EXECUTED. Draft of email correspondence to Opposing Counsel regarding request for them to forward to Opposing Party for final signature.	230	46	Karla Roman	
1/27/26	0.1	Receipt and review of email correspondence from Co-Counsel regarding client execution on long form settlement agreement. Draft of email correspondence to Co-Counsel regarding request for signature of Co-Counsel.	675	67.5	Lenden Webb	
1/27/26	0.1	Draft internal memo to file regarding action to send Opposing Counsel partially executed Settlement Agreement.	675	67.5	Lenden Webb	
1/27/26	0.1	Draft internal memo to file regarding action to cross-calendar action points from settlement agreement.	675	67.5	Lenden Webb	

1/28/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to correspond with Opposing Counsel regarding drafted Case Management Conference Statement and drafting of Motion for Preliminary Approval.	230	23	Karla Roman	
1/28/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to correspond with Opposing Counsel regarding drafted Case Management Conference Statement and drafting of Motion for Preliminary Approval.	310	31	Morgan Edgar	
1/28/26	0.2	Receipt and review of fully executed Settlement Agreement and Release and Orange Superior Court and San Mateo Superior Court to confirm action to seek court approval of the class action settlement and dismissal of the PAGA claims.	310	62	Morgan Edgar	
1/28/26	0.4	Receipt and review of draft Joint Case Management Statement. Execute edits and revisions and draft internal memo to Case Staffers regarding the same.	310	124	Morgan Edgar	
1/29/26	0.1	Receipt and review of email correspondence from Opposing Counsel regarding action to proceed filing proposed Joint Case Management Statement.	310	31	Morgan Edgar	
1/29/26	0.2	Draft of email correspondence to Opposing Counsel regarding draft of Joint Case Management Conference Statement, partially executed long form Settlement Agreement, and reminder of motion hearing in June.	230	46	Karla Roman	
1/30/26	0.1	Receipt of, save to client file and sent to case staffers the Joint CMC Statement 2026 02 Feb 26 - SIGNED.	175	17.5	Jocelyn Arteaga	
1/30/26	0.1	Receipt and review of Case Management Statement executed by Opposing Counsel for subsequent filing in Orange Superior Court.	310	31	Morgan Edgar	
1/30/26	0.2	Draft of email correspondence to Opposing Counsel regarding PDF copy of Joint Case Management Conference Statement and request for signature of the same. Receipt and review of email correspondence from Opposing Counsel serving fully executed Joint Case Management Conference Statement. Draft of email correspondence to Opposing Counsel assistant requesting copy of fully executed long form Settlement Agreement.	230	46	Karla Roman	
2/2/26	0.1	File and serve Joint Case Management Statement.	175	17.5	Jocelyn Arteaga	
2/2/26	0.1	Receipt and review of, file save, and sent to Case Staffers MejiaSCRAM Long Settlement Agreement - FULLY EXECUTED.	230	23	Karla Roman	
2/2/26	0.1	Receipt and review of email correspondence from Opposing Counsel regarding fully executed Long Form Settlement Agreement and Release. Subsequently receipt and review of the same.	310	31	Morgan Edgar	
2/3/26	0.1	Receipt and review of email correspondence from Case Staffer to Co-Counsel and Opposing Counsel regarding service of Case Management Conference.	230	23	Karla Roman	
2/3/26	0.1	Receipt and review of internal memo regarding file saved endorsed-filed copy of Joint Case Management Conference Statement.	230	23	Karla Roman	
2/3/26	0.2	(PCD 0.1) Receipt and organization of Joint CMC Statement 2026 02 Feb 26 - SIGNED - FILED, save to client file, and draft of internal memo regarding the same.	150	30	Kelley Kilgore	
2/4/26	0.1	Draft email correspondence to Co-Counsel regarding fully executed Long Form Settlement Agreement and filed Joint Case Management Statement in the PAGA action pending before Orange Superior Court.	310	31	Morgan Edgar	
2/5/26	0.1	Receipt and review of email correspondences between Case Staffer and Co-Counsel regarding fully executed copies of long form Settlement Agreement and filed Joint Case Management Conference Statement.	230	23	Karla Roman	
2/10/26	0.1	Draft internal memo to Case Staffer regarding setting of motion for preliminary approval and timeline for subsequent dismissal of PAGA action.	310	31	Morgan Edgar	
2/10/26	0.1	Receipt and review of internal memo from Case Staffer regarding action to draft email correspondence to Opposing Counsel for Preliminary Approval moving papers.	310	31	Morgan Edgar	
2/10/26	0.1	Draft of internal memo to file regarding request for case action plan.	675	67.5	Lenden Webb	
2/10/26	0.1	Draft of internal memo to case staffers regarding a request to Opposing Counsel for moving papers.	675	67.5	Lenden Webb	
2/10/26	0.3	Cross-calendar deadline for Opposing Counsel to provide us moving papers for Conditional Approval hearing, deadline to file PAGA Dismissal, and two internal deadlines to remind Opposing Counsel to provide us moving papers.	230	69	Karla Roman	
2/12/26	0.1	Receipt and review of email correspondence from Opposing Counsel regarding service contacts for updating Proof of Service.	310	31	Morgan Edgar	
2/17/26	0.1	Receipt and review of email correspondence from Case Staffer to Opposing Counsel regarding service of Notice of Change of Handling Attorney.	230	23	Karla Roman	
2/25/26	0.1	Office conference between Paralegal KJR and Office Coordinator GIO regarding obtaining appearance attorney or another case staffer for Case Management Conference February 26, 2026.	230	23	Karla Roman	
2/25/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to prepare Attorney BEN for Case Management Conference hearing on February 26, 2026.	230	23	Karla Roman	

2/25/26	0.1	Office conference between Paralegal KJR and Office Coordinator GIO regarding obtaining appearance attorney or another case staffer for Case Management Conference February 26, 2026.	310	31	Morgan Edgar	
2/25/26	0.1	Receipt and review of Court Minute Order continuing Case Management Conference to June 25, 2026 at 9:30 AM in department CX102.	310	31	Morgan Edgar	
2/25/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to prepare Attorney BEN for Case Management Conference hearing on February 26, 2026.	310	31	Morgan Edgar	
2/25/26	0.1	Office conference between Office Coordinator GIO and Attorney BEN regarding appearance at CMC.	350	35	Benjamin DeCarlo	
2/25/26	0.3	Receipt and organization of Case Management Conference - Minute Order - 2026 06 Jun 25, save to client file, and draft of internal memo regarding the same.	150	45	Kelley Kilgore	
2/26/26	0.1	Receipt and review of internal memo regarding continued Case Management Conference to June 2026. Calculate and cross-calendar deadline to file Joint Case Management Conference Statement before hearing.	230	23	Karla Roman	
3/2/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding continuation of Case Management Conference and awaiting moving papers for June motion from Opposing Counsel.	230	23	Karla Roman	
3/2/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding continuation of Case Management Conference and awaiting moving papers for June motion from Opposing Counsel.	310	31	Morgan Edgar	
4/7/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to correspond with Opposing Counsel regarding upcoming deadline to file Motion and request for moving papers.	230	23	Karla Roman	
4/7/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding action to correspond with Opposing Counsel regarding upcoming deadline to file Motion and request for moving papers.	310	31	Morgan Edgar	
4/10/26	0.1	Receipt and review of internal memo from Case Staffer confirming request for moving papers from Opposing Counsel regarding Motion for Preliminary Approval of the class settlement.	310	31	Morgan Edgar	
4/10/26	0.2	Draft of email correspondence to Opposing Counsel regarding reminder of request for moving papers for Motion for Final Approval.	230	46	Karla Roman	
4/16/26	0.1	Receipt and review of internal memo from Case Staffer regarding action for Opposing Counsel to provide moving papers for Motion for Preliminary Approval.	310	31	Morgan Edgar	
4/22/26	0.2	(PCD 0.1) Receipt of email correspondence from Kristin Moreaux. Draft of internal memo to case staffers regarding the same.	100	20	Crystal Angel	
4/22/26	0.1	Receipt and review of multiple email correspondences between witness Moreaux and Case Staffer regarding status of matter and upcoming hearing in July 2025.	230	23	Karla Roman	
4/22/26	0.1	Receipt and review of email correspondence from Class Member Kristin Moreaux regarding request for status update on court's approval of settlement.	310	31	Morgan Edgar	
4/22/26	0.1	Draft of email correspondence to Plaintiff Moreaux regarding the June 18th hearing; advise approval timeline of 6 months and fund disbursement afterwards.	675	67.5	Lenden Webb	
4/29/26	0.1	Receipt and review of internal memo from Case Staffer regarding Client requesting status update on distribution of settlement proceeds.	310	31	Morgan Edgar	
4/30/26	0.1	Receipt and review of email correspondence from Case Staffer to Client regarding status update in light of forthcoming Motion for Preliminary Approval of the Settlement and thereafter final approval hearing.	310	31	Morgan Edgar	
4/30/26	0.5	Receipt and review of internal memo regarding request for status update. Draft of email correspondence to Client regarding the same.	230	115	Karla Roman	
5/4/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding Opposing Counsel deadline to provide moving papers for Motion for Preliminary Approval.	230	23	Karla Roman	
5/4/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding Opposing Counsel deadline to provide moving papers for Motion for Preliminary Approval.	310	31	Morgan Edgar	
5/7/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding confirmation of no moving papers for Motion for Preliminary Approval sent by Opposing Counsel yet and action to follow up.	230	23	Karla Roman	
5/7/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding confirmation of no moving papers for Motion for Preliminary Approval sent by Opposing Counsel yet and action to follow up.	230	23	Morgan Edgar	
5/11/26	0.1	Office conference between Law Clerk CAM and Paralegal KJR regarding calculating of deadline to serve Motion for Preliminary Approval.	230	23	Camilla Bidart	
5/11/26	0.1	Receipt and review of email correspondence from Opposing Counsel regarding expected timeline for draft Motion for Preliminary Approval.	310	31	Morgan Edgar	
5/11/26	0.2	Office conference between Law Clerk CAM and Paralegal KJR regarding calculating of deadline to serve Motion for Preliminary Approval. Draft of email correspondence to Opposing Counsel regarding reminder to provide drafts of moving papers by May 15, 2026.	230	46	Karla Roman	

5/12/26	0.1	Receipt and review of email correspondence from Opposing Counsel regarding draft of moving papers for Motion for Preliminary Approval in progress.	230	23	Karla Roman	
5/12/26	0.2	Draft of email correspondence to Client regarding time estimate for when funds would be finalized and distributed.	230	46	Karla Roman	
5/18/26	0.1	Confirm Opposing Counsel has not yet forwarded Case Staffers drafts of moving papers for Motion for Preliminary Approval of Class Settlement.	230	23	Karla Roman	
5/19/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding Opposing Counsel failure to timely provide moving papers of Motion for Preliminary Approval.	230	23	Karla Roman	
5/19/26	0.1	Office conference between Senior Paralegal MYE and Paralegal KJR regarding Opposing Counsel failure to timely provide moving papers of Motion for Preliminary Approval.	310	31	Morgan Edgar	
5/20/26	0.2	Draft internal memo to file regarding proposed email correspondence to Opposing Counsel regarding drafts of Motion for Preliminary Approval.	230	46	Karla Roman	
5/21/26	0.3	(PCD 0.3) Add remote information for PAGA settlement hearing to calendar for 2026 06 Jun 18.	150	45	Kelley Kilgore	
5/21/26	1.6	Draft of email correspondence to Co-Counsel regarding request for review and signature on Declaration in Support of Motion for Preliminary Approval. Draft of email correspondence to Client via DocuSign regarding request for review and signature on Declaration in Support of Motion for Preliminary Approval. Receipt and review of email correspondence from Co-Counsel regarding exhibit 1 attachment. Download executed Declaration from DocuSign and combine with exhibit to prepare for filing. Draft of email correspondence to Co-Counsel regarding receipt of the same. Draft internal memo to file regarding action to telephone conference with Client to request he review and sign DocuSign if everything is correct. Draft Declaration of Webb in Support. Receipt and review of, file save, and sent to Case Staffers executed copy of Client Declaration in Support of Motion.	230	368	Karla Roman	
5/22/26	0.1	Office conference between Attorney BEN, Law Clerk CAL, Paralegal KJR regarding request for review of Memorandum of Points and Authorities in Support of Motion for Preliminary Approval.	230	23	Karla Roman	
5/22/26	0.1	Office conference between Attorney BEN, Law Clerk CAL, Paralegal KJR regarding request for review of Memorandum of Points and Authorities in Support of Motion for Preliminary Approval.	230	23	Caleb Morales	
5/22/26	0.1	Office conference between Attorney BEN and Paralegal KJR regarding approval of drafted Memorandum of Points and Authorities.	230	23	Karla Roman	
5/22/26	0.1	Office conference between Attorney BEN, Law Clerk CAL, Paralegal KJR regarding request for review of Memorandum of Points and Authorities in Support of Motion for Preliminary Approval.	350	35	Benjamin DeCarlo	
5/22/26	0.1	Office conference between Attorney BEN and Paralegal KJR regarding approval of drafted Memorandum of Points and Authorities.	350	35	Benjamin DeCarlo	
5/22/26	0.2	Office conference between Case Manager AXL and Paralegal KJR regarding submission of Motion for Preliminary Approval to LWDA and request for bid to settlement administrator.	230	46	Karla Roman	
5/22/26	0.2	Office conference between Law Clerk CAL and Paralegal KJR regarding review of citations in Memorandum of Points and Authorities in Support of Motion for Preliminary Approval.	230	46	Karla Roman	
5/22/26	0.2	Office conference between Law Clerk CAL and Paralegal KJR regarding review of citations in Memorandum of Points and Authorities in Support of Motion for Preliminary Approval.	230	46	Caleb Morales	
5/22/26	0.2	Office conference between Case Manager AXL and Paralegal KJR regarding submission of Motion for Preliminary Approval to LWDA and request for bid to settlement administrator.	295	59	Axel Chilaca	
5/22/26	0.4	Review citations for any non-published cases in Memorandum of Points and Authorities in Support of Motion for Preliminary Approval; Office conference between Paralegal KJR and Attorney BEN regarding the same.	350	140	Benjamin DeCarlo	
5/22/26	3.9	Draft Notice of Motion for Preliminary Approval. Draft of email correspondence to Settlement Administrator regarding request for bid. Review of drafted Memorandum of Points and Authorities and review, edit citations.	230	897	Karla Roman	
5/25/26	0.1	Draft of email correspondence to Co-Counsel regarding request for billing entries and expenses incurred in prosecuting matter.	230	23	Karla Roman	
5/26/26	0.9	Draft of Attorney LFW Declaration in Support of Motion for Preliminary Approval. Prepare Exhibits to Declaration. Finalize Notice.	230	207	Karla Roman	
	SUM: 273.5			SUM: \$67,149		

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

3 I am employed in the County of San Diego, State of California. I am over the age of 18 and
4 not a party to the within action; my business address is: 10509 Vista Sorrento Parkway, Suite 450, San Diego,
CA 92121. My email address is Service@WebbLawGroup.com.

5 On May 27, 2026, I served the document(s) described as:

- 6 1. NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF
7 CLASS ACTION AND PAGA SETTLEMENT
8 2. MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
9 MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND
10 PAGA SETTLEMENT
11 3. DECLARATION OF KYLE R. NORDREHAUG IN SUPPORT OF
12 PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS
13 ACTION SETTLEMENT
14 4. DECLARATION OF LENDEN F. WEBB IN SUPPORT OF PLAINTIFF'S
15 MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
16 SETTLEMENT
17 5. DECLARATION OF DAVID MEJIA IN SUPPORT OF PLAINTIFF'S
18 MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
19 SETTLEMENT
20 6. PROPOSED ORDER GRANTING MOTION FOR PRELIMINARY
21 APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT

22 on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope at: San
23 Diego, California, addressed as follows:

24 Sam G. Sherman
25 **TENCER SHERMAN, LLP**
26 12520 High Bluff Drive, Suite 230
27 San Diego, CA 92130
28 T: 858-408-6900; F: 858-754-1260
Emails: Sam@TencerSherman.com;

*Attorneys for Defendant
Scram of California, Inc.*

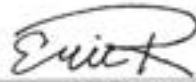
Norman B. Blumenthal
Kyle R. Nordrehaug
Aparajit Bhowmik
Jeffrey S. Herman
Sergio Julian Puche
Trevor G. Moran
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trevor@bamlawca.com

Co-Counsel for Plaintiff, David Mejia

29 XX (BY PERSONAL SERVICE) I caused the above-referenced document(s) to be delivered by hand to the
30 offices of the addressee(s).

Executed on May 27, 2026, at San Diego, California

1 XX (STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct.

3 
4

ERIC RODRIGUEZ