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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

SIMON MUNOZ and GIANCARLO
BLANCO on behalf of themselves, all others
similarly situated, and on behalf of the general
public,

Plaintiff,

v.

RDO EQUIPMENT CO.; and DOES 1-100,
Defendants.

Case No.: 1:23-cv-00979-DAD-AC

Assigned for All Purposes to:
District Judge Dale A. Drozd
Courtroom 4

CLASS ACTION

**DECLARATION OF DOUGLAS HAN IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEY FEE
AWARD, COST AWARD, AND CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENTS**

Hearing Date: November 17, 2025
Hearing Time: 1:30 p.m.
Hearing Place: Courtroom 4

Complaint Filed: April 25, 2023
FAC Filed: May 30, 2023
Removed Date: June 29, 2023
Trial Date: None Set

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Attorneys for SIMON MUNOZ and GIANCARLO BLANCO, on behalf of themselves, all
others similarly situated, and on behalf of the general public

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I, **DOUGLAS HAN**, hereby declare as follows:

1. I am an attorney duly licensed to practice law before all courts of California. I am the founding member of Justice Law Corporation. I am the attorney of record for Plaintiff Giancarlo Blanco (“Plaintiff Blanco”) and the Class in the instant action. Mara Law Firm, PC is the attorney of record for Plaintiff Simon Munoz (“Plaintiff Munoz”) and the Class in the instant action. Plaintiff Blanco and Plaintiff Munoz are collectively known as “Plaintiffs”. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On July 30, 2025, in Courtroom 4 of the above-entitled court, District Judge Dale A. Drozd preliminarily approved the Joint Stipulation and Settlement Agreement (“Settlement Agreement,” “Settlement,” or “Agreement”), provisionally certified the Justice Law Corporation Mara Law Firm, PC as Class Counsel, conditionally certified the Class, and appointed Plaintiffs as the class representatives for settlement purposes. The Court ordered the mailing of the Notice of Class Action Settlement. The Court adopted and ordered implementation of the notice procedures as specified in the Settlement Agreement. Phoenix Settlement Administrators was appointed by the Court to serve as the Settlement Administrator.

3. The Settlement was approved by Plaintiffs. As of the date of this signed declaration, no objections have been received regarding the Attorney Fee Award, Cost Award, Class Representative Enhancement Payments, and Administration Costs.

WORK PERFORMED BY JUSTICE LAW CORPORATION

4. Justice Law Corporation has actively engaged in this litigation since the onset. Prior to the filing of this case and continuing throughout, Justice Law Corporation has helped investigate the factual and legal issues. In preparation for early mediation, Justice Law Corporation received, among other things, the following information and evidence to properly

1 evaluate the claims: (a) personnel records; (b) Class Members' demographic information (*e.g.*,
2 information bearing on Class size); (c) documents pertaining to Defendant RDO Equipment
3 Co.'s ("Defendant") relevant policies, practices, and procedures (*e.g.*, meal and rest breaks,
4 timekeeping, payroll, reimbursement, etc.); and (d) sampling of time and payroll records. Using
5 the information, Justice Law Corporation helped determined: (i) Class Members' average hourly
6 rates of pay; (ii) number of current and former Class Members employed during the Class
7 Period; (iii) number of Class Members employed during the Private Attorneys General Act of
8 2004 ("PAGA") Period; (iv) number of shifts worked by the Class Members during the Class
9 Period; (v) number of hours generally worked during shifts; (vi) number, length, and timing of
10 meal and rest breaks taken; and (vii) number of workweeks and pay periods within the Class
11 Period and PAGA Periods.

12 5. Justice Law Corporation helped analyze documents produced by
13 Defendant and other sources. Justice Law Corporation also helped locate and interview putative
14 class members who apprised Justice Law Corporation of their work experiences. These
15 interviews enabled Justice Law Corporation to determine the extent and frequency of the alleged
16 violations and to learn more about the day-to-day circumstances causing these violations.
17 Collectively, this information helped better prepare Justice Law Corporation for mediation,
18 thereby increasing the chances of negotiating a settlement.

19 6. The documents analyzed provided critical understanding of the nature of
20 work performed by the Class Members and policies, practices, and procedures in place. The
21 documents were used in assessing liability and damages regarding all phases of the litigation and
22 mediation process. These documents and data exchanges allowed Justice Law Corporation to
23 understand the strengths and weaknesses of the claims and defenses and benefits of the
24 Settlement Agreement. The investigation included: (a) determining Plaintiffs' suitability to serve
25 as the class representatives via interviews and analyses of employment documents and related
26 records; (b) evaluating the potential claims and applicable defenses; (c) researching similar
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1 wage-and-hour class actions with similar claims alleged, nature of job positions, and type of
2 employer as the instant case; (d) locating and interviewing putative class members to corroborate
3 existing legal theories; (e) drafting necessary written notices to the California Labor and
4 Workforce Development Agency and Defendant; (f) engaging in motions practice with
5 Defendant; (g) being in frequent communication with co-counsel regarding the status of this
6 matter; (h) analyzing labor policies, practices, and procedures in place pursuant to documents
7 produced; (i) researching class certification and manageability in similar cases; (j) estimating
8 potential damages for settlement purposes; (k) drafting the mediation brief and damages analysis;
9 (l) preparing for and participating in mediation; and (m) drafting and finalizing the Settlement
10 Agreement (and exhibit).

11 7. After exchanging relevant information, the Parties participated in
12 mediation. The mediator helped manage the Parties' expectations and provided a useful, neutral
13 analysis of the issues and risks. Under the auspices of the mediator, the Parties eventually
14 reached a settlement. At all times, the negotiations were adversarial and non-collusive.

15 8. Class Counsel seek an Attorney Fee Award of \$679,932 (33.33% of the
16 Gross Settlement Amount). This percentage award is commensurate with the: (a) risks
17 undertaken; (b) immense time, effort, and expense dedicated to this matter; (c) skill and
18 determination displayed along with the quality of work; (d) results achieved; and (e) other cases
19 declined to devote time and effort to this matter. This was not a clear-cut case due to several
20 factors, including: (i) difficulties in pinning down job responsibilities, wages paid, and breaks
21 taken; (ii) myriads of documents that had to be reviewed and analyzed for mediation; (iii)
22 shifting wage-and-hour laws overlaid by risks of class certification being denied; (iv) engaging
23 in motions practice with Defendant; (v) frequently communicating with co-counsel about the
24 status of this matter; and (vi) Defendant's initial resistance to the relief requested.

25 9. I am aware that the common and acceptable rate for contingency
26 representation in wage-and-hour class action litigation is forty percent (40%) before trial, with
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1 the range being from thirty-three and one-third percent (33.3%) up to fifty percent (50%).

2 10. Justice Law Corporation worked many hours on this case, justifying the
3 fee request under a lodestar analysis. The total hours worked by Justice Law Corporation equals
4 510.8 hours (141.9 hours for Douglas Han, 125.3 hours for Shunt Tatavos-Gharajeh, 97.4 hours
5 for Christopher Petersen, and 146.2 hours for William Wilkinson). Attached hereto as **Exhibit 1**
6 is a Task & Time Chart detailing time spent on requisite tasks. These hours do not include
7 forthcoming administrative oversight during the payment period, final report preparation, and
8 reporting before the Court regarding the final disbursement.

9 11. Based upon the total of 510.8 hours worked and utilizing reasonable
10 hourly rates commensurate with the attorneys' experience, Justice Law Corporation's base
11 lodestar fees calculation is \$378,970. The hourly rates are \$900 per hour for myself, \$800 per
12 hour for my associate Shunt Tatavos-Gharajeh, \$800 per hour for my associate Christopher
13 Petersen, and \$500 per hour for my associate William Wilkinson. These hourly rates are
14 commensurate with our individual backgrounds, background of our firm, and our training and
15 experience in litigating class actions, particularly wage-and-hour matters, as outlined below.

16 12. In support of Justice Law Corporation's hourly rates, attached hereto as
17 **Exhibit 2** is an excerpt of the 2022 Real Rate Report compiled by Wolters Kluwer that surveyed
18 the hourly rates charged in 2022 by hundreds of attorneys in the Los Angeles County area. For
19 example, the real market rates of Los Angeles County area attorneys who practiced "Litigation"
20 are surveyed at page 16 of the report, which describes the 2022 rates charged by 322 Los
21 Angeles County partners and 408 Los Angeles County associates. For that category, the Third
22 Quartile Los Angeles County rates were \$1,045 per hour for partners and \$855 per hour for
23 associates. Similarly, page 26 of the report describes the 2022 rates charged by 63 Los Angeles
24 County associates with "Fewer Than 3 Years" of experience. For this category, the Third
25 Quartile Los Angeles County rate was \$654 per hour for associates. Page 26 of the report also
26 describes the 2022 rates charged by 144 Los Angeles County associates with "3 to Fewer Than 7
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Years” of experience. For that category, the Third Quartile Los Angeles County rate was \$838 per hour for associates. Next, page 26 of the report describes the 2022 rates charged by 171 Los Angeles County associates with “7 or More Years” of experience. For that category, the Third Quartile Los Angeles County rate was \$840 per hour for associates. Likewise, page 32 of the report describes the 2022 rates charged by 183 Los Angeles County partners with “Fewer Than 21 Years” of experience. For this category, the Third Quartile Los Angeles County rate was \$1,075 per hour for partners. Finally, our requested hourly rates are in line with the Laffey Matrix, attached hereto as **Exhibit 3**.

13. The Attorney Fee Award is in line with the awards in similar cases in California and nationwide and is consistent with the market rates. Justice Law Corporation have also been routinely awarded at least thirty-five percent (35%) fee requests or more in similar class action and representative matters throughout California. (See *Cisneros v. Artesia Christian Home, Inc.*, Los Angeles County Superior Court, Case No. 24STCV17443, final approval granted on September 17, 2025 granting 35% fee request; *Hill v. Pacific Choice Brands LLC*, Riverside County Superior Court, Case No. CVRI2304807, PAGA approval granted on July 3, 2025 granting 35% fee request; *Lopez v. Olivet International, Inc.*, Riverside County Superior Court, Case No. CVRI2303759, final approval granted on June 6, 2025 granting 35% fee request; *Hill v. NorCal LastMile LLC*, Mendocino County Superior Court, Case No. 22CV00805, final approval granted on May 7, 2025 granting 35% fee request; *Whitaker v. OREQ Corporation*, Riverside County Superior Court, Case No. CVRI2303588, final approval granted on April 4, 2025 granting 35% fee request; *Martin v. Saint Agnes Medical Center*, Merced County Superior Court, Case No. 24CV-03068, final approval granted on March 28, 2025 granting 35% fee request; *Lee v. Aquamor, LLC*, Riverside County Superior Court, Case No. CVRI2305592, final approval granted on February 7, 2025 granting 35% fee request; *Evans, et al. v. Transcontinental Ontario, Inc., et al.*, San Bernardino County Superior Court, Case No. CIVSB2317702 [Consolidated with Case No. CIVSB2331552], final approval granted on

January 7, 2025 granting 35% fee request; *Bangley v. Bedon Construction, Inc.*, Kern County Superior Court, Case No. BCV-23-103251, final approval granted on November 4, 2024 granting 35% fee request; *Renteria v. Camfil USA, Inc.*, Kings County Superior Court, Case No. 23CU0143, final approval granted on July 19, 2024 granting 35% fee request; *Rodriguez v. Central Valley Opportunity Center Incorporated*, Merced County Superior Court, Case No. 22CV-01358, final approval granted on May 2, 2024 granting 35% fee request; *Medrano v. G & J Heavy Haul, Inc.*, Tulare County Superior Court, Case No. VCU292423 [Consolidated With Case No. VCU292424], final approval granted on March 22, 2024 granting 35% fee request; *Salinas v. Claremont Retirement Management Services, Inc.*, Sacramento County Superior Court, Case No. 34-2021-00294807, final approval granted on March 1, 2024 granting 35% fee request; *Wilcox v. Eggleton Trucking, Inc., et al.*, Riverside County Superior Court, Case No. CVRI2000764, final approval granted on January 16, 2024 granting 35% fee request; *Carlton v. Waxie Way, LLC, et al.*, San Diego County Superior Court, Case No. 37-2021-00026158-CU-OE-CTL, final approval granted on November 6, 2023 granting 35% fee request; *Park v. Brenda's LLC dba Brenda's French Soul Food*, San Francisco County Superior Court, Case No. CGC-22-599371, final approval granted on September 26, 2023 granting 35% fee request; *Johnson v. Trumpet Behavioral Health, LLC, et al.*, Merced County Superior Court, Case No. 21CV-01505, final approval granted on May 30, 2023 granting 38% fee request; *Vargas v. Spates Fabricators, Inc.*, Riverside County Superior Court, Case No. CVRI2100462, final approval granted on April 4, 2023 granting 35% fee request; *McEathron v. Ahern Rentals, Inc.*, Alameda County Superior Court, Case No. RG17867366, final approval granted November 23, 2022 granting 35% fee request; and *Salinas v. Change Healthcare Technology Enabled Services, LLC*, Ventura County Superior Court, Case No. 56-2020-00539300, final approval granted on January 7, 2022 granting 38% fee request.)

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1 14. The Parties entered a Joint Prosecution Agreement (“JPA”) on May 30,
2 2023. Under the JPA, the Parties agreed to split the Attorney Fee Award as follows: fifty percent
3 (50%) to Justice Law Corporation and fifty percent (50%) to Mara Law Firm, PC. Attached
4 hereto as **Exhibit 4** is a true and correct copy of the signed JPA.

5 **ADEQUACY OF JUSTICE LAW CORPORATION**

6 15. In May 2004, I graduated from Pepperdine University School of Law with
7 a Juris Doctor degree. In May 2001, I obtained a Bachelor of Science degree in Political Science
8 with a minor in English from University of Houston.

9 16. Since its inception, our firm has almost exclusively focused on the
10 prosecution of consumer and employment class actions, involving wage-and-hour claims, unfair
11 business practices, or consumer fraud. Our firm has successfully litigated to conclusion over
12 three hundred (300) wage-and-hour class or representative actions. Currently, we are the
13 attorneys of record in over a dozen employment-related putative class actions in both state and
14 federal courts in California. During this time, in association with other law firms, we have
15 obtained millions of dollars on behalf of thousands of individuals in California.

16 17. Attached hereto as **Exhibit 5** is a list of some of the class action and
17 representative matters for which Justice Law Corporation have been appointed to serve as class
18 counsel that have been given final approval.

19 18. Our firm also has appellate experience that resulted in the following cases
20 being published that defined and clarified wage and hour law: (a) *Oswald v. Murray Plumbing &*
21 *Heating Corp.* (2022) 82 Cal.App.5th 938; (b) *Garner v. Inter-State Oil Co.* (2020) 52
22 Cal.App.5th 619; (c) *Brooks v. AmeriHome Mortgage Co., LLC* (2020) 47 Cal.App.5th 624; (d)
23 *Nieto v. Fresno Beverage Company, Inc.* (2019) 33 Cal.App.5th 274; and (e) *Esparza v. KSI*
24 *Industries, L.P.* (2017) 13 Cal.App.5th 1228.

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19. Shunt Tatavos-Gharajeh is a Partner at my office. Shunt received his undergraduate degree from University of California, Los Angeles and earned a Juris Doctor degree from Southwestern University School of Law. Shunt was admitted to practice in California in December 2010. Shunt is admitted to practice in the Courts of California. The focus of Shunt's practice is class action wage-and-hour law. Shunt has worked on multiple class action cases and representative actions that have been granted approval, including *Keles v. The Art of Shaving – FL, LLC*, Alameda County Superior Court, Case No. RG13687151; *Esters v. HDB LTD. Limited Partnership*, Kern County Superior Court, Case No. S-1500-CV-279879; *Guzman v. International City Mortgage, Inc.*, San Bernardino County Superior Court, Case No. CIVDS1502516; *Davidson v. Lentz Construction General Engineering Contractor*, Kern County Superior Court, Case No. S-1500-CV-279853; *Betancourt v. Hugo Boss USA, Inc.*, Los Angeles County Superior Court, Case No. BC506988; *Porras v. DBI Beverage, Inc.*, Santa Clara County Superior Court, Case No. 1-14-CV-266154; *Hartzell v. Truitt Oilfield Maintenance Corporation*, Kern County Superior Court, Case No. S-1500-CV-283011; *Navarro-Salas v. Markstein Beverage Co.*, Sacramento County Superior Court, Case No. 34-2015-00174957-CU-OE-GDS; *White v. Pilot Travel Centers, LLC*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2013-0009098; *McKinnon v. Renovate America, Inc., et al.*, San Diego County Superior Court, Case No. 37-2015-00038150-CU-OE-CTL; *Antoine v. Riverstone Residential CA, Inc.*, Sacramento County Superior Court, Case No. 34-2013-00155974-CU-OE-GDS; *Pina v. Zim Industries, Inc.*, Kern County Superior Court, Case No. S-1500-CV-284498; *Amaya v. Certified Payment Processing*, Sacramento County Superior Court, Case No. 34-2015-00186623-CU-OE-GDS; *Burke v. Petrol Production Supply, Inc.*, Kern County Superior Court, Case No. BCV-15-101092; *Ceron v. Hydro Resources-West, Inc.*, Kern County Superior Court, Case No. BCV-15-101461; *Chavana v. Golden Empire Equipment, Inc.*, Kern County Superior Court, Case No. BCV-16-102796; *De La Torre v. Acuity Brands Lighting, Inc.*, San Bernardino County Superior Court, Case No. CIVDS1601800; *Dobbs v. Wood Group PSN, Inc.*, Kern

County Superior Court, Case No. BCV-16-101078; *Gonzalez v. Matagrano, Inc.*, San Francisco County Superior Court, Case No. CGC-16-550494; *Harbabikian v. Williston Financial Group, LLC*, Ventura County Superior Court, Case No. 56-2016-004485186-CU-OE-VTA; *Prince v. Ponder Environmental Services, Inc.*, Kern County Superior Court, Case No. BCV-16-100784; *Ramirez v. Crestwood Operations, LLC*, Kern County Superior Court, Case No. BCV-17-100503; *Reyes v. Halliburton Energy Services, Inc.*, Kern County Superior Court, Case No. S-1500-CV-280215; *Rodriguez v. B&L Casing Serve, LLC*, Kern County Superior Court, Case No. S-1500-CV-282709; *Marketstar Wage and Hour Cases*, Alameda County Superior Court, Case No. JCCP004820; *Rodriguez v. Delta Sierra Beverage, LLC*, Sacramento County Superior Court, Case No. 34-2017-00206727-CU-OE-GDS; *Stuck v. Jerry Melton & Sons Construction, Inc.*, Kern County Superior Court, Case No. BCV-16-101516; *Blevins v. California Commercial Solar, Inc.*, Kern County Superior Case, No. BCV-17-100571; *Cisneros v. Wilbur-Ellis Company, LLC*, Kern County Superior Court, Case No. BCV-17-102836; and *Castro v. General Production Service of California, Inc.*, Kern County Superior Court, Case No. BCV-15-101164. Shunt was also certified as class counsel in *Fulmer v. Golden State Drilling, Inc.*, Kern County Superior Court, Case No. S-1500-CV-279707; *Manas v. Kenai Drilling Limited*, Los Angeles County Superior Court, Case No. BC546330; *Nuncio v. MMI Services, Inc.*, Kern County Superior Court, Case No. S-1500-CV-282534; and *Ferrer v. Ameriflex, Inc.*, Riverside County Superior Court, Case No. RIC2002157, cases that were certified after a contested class certification. Shunt is handling class actions pending in California.

20. Christopher Petersen is a Senior Attorney at my office. Christopher received his undergraduate degree from Northwestern University with a double major in Philosophy and Comparative Literature. Christopher earned a Juris Doctor degree from the University of Southern California Gould School of Law and was admitted to practice in California in December 2008. Christopher is admitted to practice in all state and federal courts in California. The focus of Christopher's practice throughout his career has been on representative

1 wage-and-hour cases. Christopher worked for eleven (11) years at Akin Gump Strauss Hauer &
2 Feld LLP, beginning as a summer associate, then an associate, counsel, and finally senior
3 counsel. Christopher then moved to Davis Wright Tremaine for two (2) years, again serving as
4 senior counsel. In his roles as counsel and senior counsel, Christopher handled strategy and day-
5 to-day management of class and PAGA actions, also overseeing associates working on the same
6 matters. Christopher has been involved with many notable cases in state and federal courts, most
7 importantly working for over a decade on one of the companion cases that comprised the United
8 States Supreme Court case *Lewis v. Epic Systems* involving the enforceability of class-action
9 waivers in arbitration agreements in the context of employment cases. Since joining Justice Law
10 Corporation, Christopher has worked on several wage-and-hour class action and representative
11 PAGA matters that have been granted approval, including *Ramirez v. Delta Dental of California*,
12 San Francisco County Superior Court, Case No. CGC-21-589648; *Caraway v. Gar Laboratories*
13 *Inc.*, Riverside County Superior Court, Case No. CVRI2100812 [Consolidated with Case No.
14 CVRI2204893]; *Silva v. Ben Myerson Candy Co., Inc. dba Wine Warehouse*, Los Angeles
15 County Superior Court, Case No. 20STCV21665; *Charles v. Novasyste, LLC*, San Diego County
16 Superior Court, Case No. 37-2022-00033748-CU-OE-CTL; *Garcia v. V-T Industries, Inc, et al.*,
17 San Bernardino County Superior Court, Case No. CIVSB2129236; *Valverde v. Rivulis*
18 *Irrigation, Inc.*, Madera County Superior Court, Case No. MCV089185; *Marin v. D.M.E., Inc.*,
19 Los Angeles County Superior Court, Case No. 23STCV21190; *Morales, Jr. v. Cygnus Home*
20 *Service, LLC*, Kern County Superior Court, Case No. BCV-24-103203; *Soto v. Mid-Valley*
21 *Disposal, et al.*, Merced County Superior Court, Case No. 23CV-00672; *Arballo v. Brasscraft*
22 *Manufacturing Company*, Riverside County Superior Court, Case No. CVRI2201631; *Boyd, et*
23 *a.; v. Midpen Property Management Corporation, et al.*, San Mateo County Superior Court,
24 Case No. 22-CIV-03192; and *Harrison v. California Fine Wire Co.*, San Luis Obispo County
25 Superior Court, Case No. 23CV-0703. Christopher is working on several wage-and-hour class
26 action and representative PAGA matters pending in various courts in California since joining
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Justice Law Corporation. These cases include, but are not limited to, *Wicker v. Pearce Services, LLC*, San Luis Obispo County Superior Court, Case No. 23CVP-0297; *Messick v. Sprig Electric Co.*, Santa Clara County Superior Court, Case No. 24CV431734; *Stone v. Trinity Property Consultants, LLC*, Orange County Superior Court, Case No. 30-2023-01323776-CU-OE-CXC; *Ambary, et al., v. Abbot Laboratories, Inc., et al.*, Solano County Superior Court, Case No. FCS055061; *Soto-Trejo v. Air Fayre CA, Inc.*, Los Angeles County Superior Court, Case No. 21TRCV00462; *Garcia v. C.H.D.S., Inc., d/b/a Curtis Drilling Co.*, San Diego County Superior Court Case No. 37-2023-00041774-CU-OE-CTL; *Payne v. Avalon Transportation, LLC*, Los Angeles County Superior Court, Case No. 23STCV30586; *Davidson v. Blossom Ridge Home Health Agency, LLC*, Sacramento County Superior Court, Case No. 24CV017121; *Melgoza v. Hanover Holdings*, Kern County Superior Court, Case No. BCV-22-100210-BCB; *Woolridge v. Jain Farm Fresh Foods, Inc. d/b/a White Oak Frozen Foods*, Merced County Superior Court, Case No. 20CV-03465; *Andres v. Mark III Construction, Inc.*, Sacramento County Superior Court, Case No. 24CV011383; and *Barone v. Pacific Coast Service, Inc. dba Pacific Homecare Services Inc., et al.*, Alameda County Superior Court, Case No. 24CV078857.

21. William Wilkinson is an Associate Attorney at my office. William earned an undergraduate degree in Communication Studies from the University of Iowa. William obtained his Juris Doctor degree from the University of Southern California Gould School of Law. As a law student, William externed for the Honorable John A. Kronstadt in the United States District Court for the Central District of California and for the Honorable Juliana Sherman, Administrative Law Judge in the Equal Employment Opportunity Commission's Hearings Unit. William was admitted to practice law in December 2022 and is presently admitted to practice in all courts of California and before all federal district courts in California. William's practice focuses on wage-and-hour class action and representative PAGA matters. Since joining Justice Law Corporation, William has worked on wage-and-hour class action and representative PAGA matters that have been granted approval, including *Barnes v. UST Select*,

1 *Inc.*, Butte County Superior Court, Case No. 22CV02939; *Chavez, et al. v. Deckers Outdoor*
2 *Corporation, et al.*, Santa Barbara County Superior Court, Case No. 23CV04874; *Renteria v.*
3 *Camfil USA, Inc.*, Kings County Superior Court, Case No. 23CU0143, *Cotton v. Custom Care*
4 *Logistics, LLC*, Sacramento County Superior Court, Case No. 34-2022-00320283; *Hill v. Virtus*
5 *Nutrition, LLC, et al.*, Stanislaus County Superior Court, Case No. CV-23-000667; *Harris v. RL*
6 *Liquidators, LLC*, Sacramento County Superior Court, Case No. 23CV000905; *Rippa v.*
7 *Cornerstone Deliveries LLC dba Cornerstone Delivery Service*, Riverside County Superior
8 Court, Case No. CVRI2202702; *Moreno v. Southern California Discount Tire Co.*, San Diego
9 Superior County Superior Court, Case No. 37-2022-00050608-CU-OE-CTL; *Estrella v. Western*
10 *Foods, LLC*, Yolo County Superior Court, Case No. CV2022-0926; *Haro v. Armada Shipping*
11 *LLC*, Los Angeles County Superior Court, Case No. 22STCV3343; *Santos v. United*
12 *Aeronautical Corporation*, Los Angeles County Superior Court, Case No. 23STCV24020; and
13 *Zamudio v. Hronis, Inc., at al.*, Kern County Superior Court, Case No. BCV-19-101310. William
14 is working on several wage-and-hour class action and representative PAGA matters pending in
15 courts across California, including *Estrada et al v. Fratelli Beretta USA, Inc. dba Busseto Foods*,
16 Merced County Superior Court, Case No. 24CV-05727; *Mapes v. Nor-Cal Beverage Col, Inc.*,
17 Yolo County Superior Court, Case No. CV2022-1076; *Tran v. Byram Healthcare Centers, Inc.*,
18 Orange County Superior Court, Case No. 30-2023-01309069-CU-OE-CXC; *Jaramillo v.*
19 *Agendia, Inc.*, Orange County Superior Court, Case No. 30-2023-01321495-CU-OE-CXC;
20 *Garcia v. Deegan Express*, Los Angeles County Superior Court, Case No. 23STCV02604;
21 *Rangel v. Fresh Express Incorporated*, Monterey County Superior Court, Case No.
22 23CV000859; *Smith v. Novipax LLC*, Los Angeles County Superior Court Case No.
23 23STCV04784; *Victorino v. All-City Management Services, Inc.*, Los Angeles County Superior
24 Court, Case No 23STCV19464; *Greene v. Baby List, Inc.*, Sacramento County Superior Court,
25 Case No. 23CV008654; *Bailey v. Behavior Genius, LLC*, San Bernardino County Superior
26 Court, Case No. CIVSB2418943; *Meza v. Align Aerospace LLC, et al.*, Los Angeles County
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1 Superior Court, Case No. 24STCV21803; *Curology, Inc. adv. Gallegos*, San Diego County
2 Superior Court, Case No. 37-2023-00050824-CU-OE-CTL; *Morgan-Todt, Inc. d/b/a United*
3 *Cold Storage adv. Madkins*, Alameda County Superior Court, Case No. 23CV044570; *Andrade*
4 *v. Paper Cuts, Inc.*, Los Angeles County Superior Court, Case No. 24STCV24427; *Smiljkovich*
5 *v. Accutek Packaging Equipment Company*, San Diego County Superior Court, Case No.
6 25CU013309C; *Forst v. Atlas Disposal Industries, LLC*, Sacramento County Superior Court,
7 Case No. 25CV004645; and *Herrera v. CalSolar, LLC, et al.*, Los Angeles County Superior
8 Court, Case No. 24STCV15008.

9 **CLASS REPRESENTATIVE ENHANCEMENT PAYMENTS**

10 22. The Settlement Agreement provides for the payment of the Class
11 Representative Enhancement Payments of \$10,000 to each Plaintiff (totaling \$20,000) for the
12 time and effort spent serving as the class representatives. Plaintiffs spent several hours (and
13 days) producing relevant documents and past employment records (*e.g.*, personnel records), as
14 well as providing facts and evidence necessary to prove the allegations (*e.g.*, description of work
15 experience and work environment). Plaintiffs were accessible to Class Counsel and actively tried
16 to obtain and provide as much information as possible to benefit the Class (*e.g.*, giving the
17 contact information of putative class members, discussing applicable legal theories, gathering
18 information from putative class members). Plaintiffs even assisted Class Counsel with reviewing
19 documents produced by Defendant and other sources, developing a strategy to obtain additional
20 documents, determining the importance of the documents produced, and reviewing the operative
21 complaints. Furthermore, Plaintiffs prepared for and made themselves available to attend
22 mediation, provided input on negotiations, and reviewed and approved the Settlement Agreement
23 (and exhibit). Plaintiffs were also made aware of and accepted the risks and sacrifices associated
24 with serving as the class representatives (*e.g.*, providing a broader release, risking an adverse
25 judgment for attorneys' fees and costs, losing a potential source of income). Thus, it is
26 appropriate and just for Plaintiffs to receive the Class Representative Enhancement Payments, in
27

1 addition to the Individual Class Payment, for the services on behalf of the Class.

2 **LITIGATION COSTS AND EXPENSES INCURRED BY**

3 **JUSTICE LAW CORPORATION**

4 23. Justice Law Corporation incurred \$17,480.21 in costs and litigation
5 expenses as reflected in **Exhibit 6**. These costs and expenses were reasonable and necessary.

6 **CONCLUSION**

7 24. I submit that the Settlement Agreement reached is fair, reasonable, and
8 adequate. I submit that the Settlement Agreement is in the best interest of Plaintiffs and Class.

9
10 I declare that under the penalty of perjury under the laws of California the foregoing is
11 true and correct. Executed on this 9th day of October 2025 at Pasadena, California.

12
13 /s/ Douglas Han
14 Douglas Han
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EXHIBIT 1

SIMON MUNOZ et al. v. RDO EQUIPMENT CO.
(UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF CALIFORNIA, CASE No. 1:23-CV-00979-DAD-AC, STANISLAUS COUNTY SUPERIOR COURT CASE No. CV-23-002243, RIVERSIDE COUNTY SUPERIOR COURT CASE No. CVRI2301163, NINTH CIRCUIT COURT OF APPEALS CASE No. 24-2356, AAA CASE No. 01-23-0003-5132)
ATTORNEY TASK AND TIME CHART

TASKS	JUSTICE LAW CORPORATION				
	DH	STG	CP	WW	FIRM TOTAL
Investigation and Research / Due Diligence					
Pre-Lawsuit Investigation of the Key Facts with a Focus on 1) Class Certification Elements, including Adequacy, Typicality, Superiority, and Commonality; 2) Merits of Plaintiff Simon Munoz and Giancarlo Blanco's Claims and the Merits of the Claims of the Putative Class Members; and 3) Potential Damages Exposure of Defendant RDO Equipment Co. with respect to the Damages Sustained by Simon Munoz and Giancarlo Blanco	2.5	3.8	1.1	1.4	8.8
Pre-Lawsuit Research and Analysis of Potential Damages Exposure of Defendant RDO Equipment Co. with Respect to the Damages Sustained by/Owed to Named Plaintiff Simon Munoz and Giancarlo Blanco and the Putative Class Members	2.3	2.9	2.2	2.1	9.5
Prepare a Discovery Strategy Plan of Action, including Topics of Inquiry Important to Certification, Liability, and Damages/Civil Penalties	2.6	2.7	1.6	2.2	9.1
Investigation of Defendant RDO Equipment Co., Defendant's Business Relationships, and the Industry in which It Operates and Various Staffing Agencies Which Provided Labor to Defendant	2.5	2.1	1.2	1.5	7.3
Meet and Communicate with Named Plaintiffs Simon Munoz and Giancarlo Blanco throughout the Pendency of the Case	10.7	9.5	8.2	13.3	41.7
Research and Analysis of Potential Defenses Defendant RDO Equipment Co. May Raise, Including, <i>de minimis</i> Work, Non-Compensable Off-the-Clock Work, Compliant Policies and Manageability and Arbitration Agreements	2.9	2.4	1.3	2.7	9.3
Communication with Putative Class Members, and Conduct Interviews, and Request Authorization for Personnel Records	9.8	13.2	9.4	11.5	43.9

Analysis and Review of Time Records and Corresponding Wage Statements of Putative Class Members with a Focus on Violation Rates for Missed, Short, Late, or Interrupted Meal and Rest Periods, and Whether Any Corresponding Premium Pay Was Issued by Defendant RDO Equipment Co. or Regular Rate was Properly Calculated	2.9	2.6	1.9	3.3	10.7
Pleadings and Court Filings (Case No. CV-23-002243)					
Review and Analyze Plaintiff Simon Munoz’s Complaint for Civil Penalties for Violation of Labor Code § 2698, et seq.; Legal Research and Analysis of All Claims Involved (Filed 4.25.23)	0.7	0.7	0	1.5	2.9
Review Court’s Notice of Case Assignment to Honorable John R. Mayne and Case Management Conference (Filed 4.25.23)	0.1	0.1	0.1	0.1	0.4
Review and Analyze Plaintiff Simon Munoz’s First Amended Class Action Complaint for Damages, Injunctive Relief, Declaratory Relief, and Restitution (Filed 5.30.23)	0.7	1.1	0	0.5	2.3
Review and Analyze RDO Equipment Co.’s Notice to the Court and to Adverse Party of Removal (Filed 6.28.23)	0.1	0.1	0.1	0.1	0.4
Review and Analyze Joint Status Conference Statement Regarding the February 23, 2024 Status Conference (Filed 2.15.24)	0.2	0.2	0.2	0.2	0.8
Review and Analyze Defendant RDO Equipment Co.’s Notice of Change of Address (Filed 3.22.24)	0.1	0.1	0.1	0.1	0.4
Review and Analyze Joint Stipulation to Continue Status Conference (Filed 2.21.25)	0.2	0.2	0.2	0.2	0.8
Review Court’s Order Cont. Status Conference to February 6, 2026 (Filed 2.21.25)	0.1	0.1	0.1	0.1	0.4
Pleadings and Court Filings (Case No. 1:23–CV–00979–DAD–AC)					
Review and Analyze Notice of Corporate Disclosure Statement and Declaration of Emily Keeling in Support Thereof (Filed 6.29.23)	0.2	0.1	0.1	0.2	0.6
Review Court’s Notice of September 28, 2023 Initial Scheduling Conference and Honorable Ana De Alba’s Standing Order (Filed 6.29.23)	0.1	0.1	0.1	0.1	0.4
Review Court’s Minute Order Dated July 6, 2023	0.1	0.1	0.1	0.1	0.4

Prepare Notice of Appearance for Attorneys Douglas Han, Shunt Tatavos-Gharajeh, and William Wilkinson (Filed 7.10.23)	0.2	0.2	0	0.2	0.6
Review Court's Minute Order Dated July 11, 2023	0.1	0.1	0.1	0.1	0.4
Review Court's Order of Reassignment (Filed 9.13.23)	0.2	0.2	0.2	0.2	0.8
Review and Analyze Joint Scheduling Report (Filed 9.14.23)	1.1	0.2	0	0.2	1.5
Review Court's Minute Order Dated September 27, 2023	0.1	0.1	0.1	0.1	0.4
Review Court's Order Setting Status Conference (Filed 9.28.23)	0.2	0.2	0.2	0.2	0.8
Review Honorable Dale A. Drozd's Standing Order (Filed 10.6.23)	0.2	0.2	0.2	0.2	0.8
Review Court's Minute Order Dated October 19, 2023	0.1	0.1	0.1	0.1	0.4
Review and Analyze Joint Scheduling Report (Filed 10.24.23)	0.2	0.2	0.2	0.2	0.8
Review and Analyze Plaintiff Simon Munoz's Decline of Magistrate Judge Allison Claire (Filed 10.26.23)	0.2	0.2	0.2	0.2	0.8
Review and Analyze Defendant RDO Equipment Co.'s Decline of Magistrate Judge Allison Claire (Filed 10.27.23)	0.2	0.2	0.2	0.2	0.8
Review Court's Minute Order Dated November 8, 2023	0.2	0.2	0.2	0.2	0.8
Review and Analyze Supplemental Joint Status Report (Filed 2.28.24)	1	0.5	0	0.7	2.2
Review Court's Minute Order Dated February 29, 2024	0.2	0.2	0.2	0.2	0.8
Review and Analyze Defendant RDO Equipment Co.'s Notice of Change of Address (Filed 3.22.24)	0.1	0.1	0.1	0.1	0.4
Review and Analyze Defendant RDO Equipment Co.'s Notice of Errata re Notice of Change of Address (Filed 3.22.24)	0.1	0.1	0.1	0.1	0.4
Review Court's Order Denying Defendant RDO Equipment Co.'s Motion to Compel Arbitration and to Dismiss Plaintiff's First Amended Complaint (Filed 3.22.24)	0.1	0.1	0.1	0.1	0.4

Review and Analyze Defendant RDO Equipment Co.’s Notice of Errata Regarding Change of Address (Filed 3.22.24)	0.1	0.1	0.1	0.1	0.4
Review and Analyze Defendant RDO Equipment Co.’s Notice of Appeal (Filed 4.11.24)	0.1	0.1	0.1	0.1	0.4
Review Court’s Notice of Defendant RDO Equipment Co.’s Notice of Appeal (Filed 4.16.24)	0.1	0.1	0.1	0.1	0.4
Review and Analyze Court’s Minute Order Dated April 16, 2024	0.1	0.1	0.1	0.1	0.4
Review and Analyze Joint Stipulation for Protective Order (Filed 6.11.24)	0.3	0.3	0.1	0.2	0.9
Review and Analyze Joint Status Report (Filed 11.1.24)	0.7	0.5	0.2	0.5	1.9
Review Court’s Minute Order Dated November 1, 2024	0.1	0.1	0.1	0.1	0.4
Review and Analyze Joint Stipulation for Leave to File Second Amended Complaint; [Proposed] Order (Filed 12.17.24)	1	0.4	0.2	0.7	2.3
Review Court’s Minute Order Dated December 19, 2024	0.1	0.1	0.1	0.1	0.4
Review and Analyze Plaintiff Simon Munoz’s Second Amended Class Action Complaint for Damages, Injunctive Relief, Declaratory Relief, and Restitution (Filed 12.19.24)	0.9	0.4	0.2	0.7	2.2
Review and Analyze Defendant RDO Equipment Co.’s Proof of Service re: Notice of Proposed Class Action Settlement Pursuant to Class Action Fairness Act, 28 U.S.C. § 1715 (Filed 12.30.24)	0.1	0.1	0.1	0.1	0.4
Review Court’s Minute Order Dated January 16, 2025	0.1	0.1	0.1	0.1	0.4
Review Court’s Minute Order Dated January 22, 2025	0.1	0.1	0.1	0.1	0.4
Review Court’s Order Granting Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement (Filed 7.30.25)	0.2	0.2	0.2	0.2	0.8
Review Court’s Order Granting Plaintiffs’ Motion for Final Approval of Class Action Settlement; Prepare Notice of Entry of Order (Anticipated)	0.3	0.2	0.1	0.3	0.9
Pleadings and Court Filings (Case No. 24-2356)					

Review Court's Notice Regarding Copy of Appellant RDO Equipment Co.'s Notice of Appeal (Filed 4.15.24)	0.7	1.1	1.2	0.6	3.6
Review Court's Schedule Notice (Filed 4.15.24)	0.1	0.1	0.1	0.1	0.4
Review and Analyze Appellant RDO Equipment Co.'s Mediation Questionnaire (Filed 4.22.24)	1	0.2	0.2	1	2.4
Review Court's Notice of May 13, 2024 Mediation Conference (Filed 4.26.24)	0.1	0.1	0.1	0.1	0.4
Review Court's Notice of Mediation Status Report Deadline (Filed 5.13.24)	0.1	0.1	0.1	0.1	0.4
Review Court's Notice of Continued Mediation Status Report Deadline (Filed 7.23.24)	0.1	0.1	0.1	0.1	0.4
Review Court Order Temporarily Closing Court Docket (Filed 9.25.24)	0.1	0.1	0.1	0.1	0.4
Review Court's Notice of Continued Mediation Status Report Deadline (Filed 2.10.25)	0.1	0.1	0.1	0.1	0.4
Review Court's Notice of Continued Mediation Status Report Deadline (Filed 2.10.25)	0.1	0.1	0.1	0.1	0.4
Pleadings and Court Filings (Case No. CVRI2301163)					
Draft Plaintiff Giancarlo Blanco's Complaint for Civil Penalties for Violation of Labor Code § 2698, et seq.; Legal Research and Analysis of All Claims Involved (Filed 3.8.23)	0.8	1.1	0	0.6	2.5
Review Court's Notice of Department Assignment to Honorable Harold W. Hopp and May 8, 2023 Initial Case Management Conference (Filed 3.8.23)	0.3	0.2	0.1	0.1	0.7
Review Court's PAGA Case Management Order #1 (Filed 3.14.23)	0.3	0.2	0.1	0.1	0.7
Prepare Plaintiff Giancarlo Blanco's Notice of PAGA Case Management Order #1 (Filed 3.27.23)	0.1	0.1	0.1	0.3	0.6
Draft Plaintiff Giancarlo Blanco's First Amended Complaint for Civil Penalties for Violation of Labor Code § 2698, et seq. (Private Attorneys General Act of 2004) (Filed 4.28.23)	0.4	0.7	0	0.6	1.7
Draft Joint Initial Case Management Statement Regarding May 8, 2023 Initial Case Management Conference (Filed 5.1.23)	0.2	0.2	0.2	0.2	0.8
Review Court's Minute Order Dated May 4, 2023	0.1	0.1	0.1	0.1	0.4

Review Court's Notice of Department Reassignment to Honorable Christopher B. Harmon (Filed 5.18.23)	0.1	0.1	0.1	0.1	0.4
Prepare Plaintiff Giancarlo Blanco's Notice of Case Reassignment (Filed 5.25.23)	0.1	0.1	0.1	0.3	0.6
Prepare Plaintiff Giancarlo Blanco's Notice of Association of Counsel (Filed 6.1.23)	0.1	0.1	0.1	0.3	0.6
Review Court's Notice of Department Change to Honorable Harold Hopp (Filed 6.26.23)	0.1	0.1	0.1	0.1	0.4
Prepare Plaintiff Giancarlo Blanco's Notice of Department Reassignment and Amended Proof of Service (Filed 7.10.23)	0.1	0.1	0.1	0.3	0.6
Draft Joint Statement Regarding July 25, 2023 Initial Case Management Conference (Filed 7.18.23)	0.2	0.2	0.2	0.2	0.8
Review Court's Minute Order Date May 4, 2023	0.1	0.1	0.1	0.1	0.4
Review Court's Tentative Ruling Regarding July 25, 2023 Hearing on Defendant's Motion to Compel	0.2	0.2	0.2	0.2	0.8
Review Court's Minute Order Dated July 25, 2023	0.1	0.1	0.1	0.1	0.4
Review and Analyze Defendant RDO Equipment Co.'s Notice of Ruling on Defendant RDO Equipment Co.'s Motion to Compel Individual Arbitration and to Stay Proceedings Pending a Ruling on Motion and Completion of Arbitration (Filed 7.28.23)	0.3	0.2	0.1	0.2	0.8
Review Court's Notice of Department Reassignment for all Purposes to Honorable Christopher B. Harmon (Filed 5.18.23)	0.1	0.1	0.1	0.1	0.4
Prepare Plaintiff Giancarlo Blanco's Notice of Association of Counsel with Co-Counsel Mara Law Firm P.C. (Filed 5.25.23)	0.1	0.1	0.1	0.1	0.4
Review Court's Notice of Department Change for all Purposes to Honorable Harold Hopp (Filed 6.26.23)	0.1	0.1	0.1	0.1	0.4
Prepare Plaintiff Giancarlo Blanco's Notice of Department Reassignment for all Purposes (Filed 7.10.23)	0.1	0.1	0.1	0.1	0.4
Prepare Plaintiff Giancarlo Blanco's Amended Proof of Service Regarding Notice of Department Reassignment for all Purposes (Filed 7.10.23)	0.1	0.1	0.1	0.1	0.4
Review Court's Order Granting Defendant RDO Equipment Co.'s Motion to Compel on Plaintiff's First Amended Complaint (Filed 8.1.23)	0.3	0.3	0.1	0.2	0.9

Review and Analyze Defendant RDO Equipment Co.'s Notice of Change of Address (Filed 3.22.24)	0.1	0.1	0.1	0.1	0.4
Review and Analyze Defendant RDO Equipment Co.'s Notice of Change of Address (Filed 3.26.24)	0.1	0.1	0.1	0.1	0.4
Draft Joint Statement Regarding July 25, 2024 Post-Arbitration Status Hearing (Filed 7.18.24)	0.1	0.1	0.1	0.3	0.6
Review Court's Minute Order Dated July 25, 2024	0.1	0.1	0.1	0.1	0.4
Draft Joint Statement Regarding February 28, 2025 Post-Arbitration Status Hearing (Filed 2.21.25)	0.1	0.1	0.1	0.3	0.6
Review Court's Minute Order Dated February 27, 2025	0.1	0.1	0.1	0.1	0.4
Review Court's Notice of Order to Show Cause Hearing (Filed 2.27.25)	0.2	0.1	0.1	0.1	0.5
Draft Joint Statement Regarding August 28, 2025 Post-Arbitration Status Hearing (Filed 8.20.25)	0.1	0.1	0.1	0.3	0.6
Review Court's Minute Order Dated August 27, 2025	0.1	0.1	0.1	0.1	0.4
Review Court's Notice of Order to Show Cause Hearing (Filed 8.27.25)	0.1	0.1	0.1	0.1	0.4
Pleadings and Court Filings (Case No. 01-23-0003-5132)					
Draft Claimant Giancarlo Blanco's Demand for Arbitration (Filed 8.8.23)	0.7	0.6	0	0.6	1.9
Review and Analyze Respondent RDO Equipment Co.'s Answer to Claimant Gioancarlo Blanco's Demand for Arbitration (Filed 10.9.23)	0.9	0.3	0	0.5	1.7
Review AAA's Scheduling Order #1 (Filed 1.12.24)	0.5	0.5	0.5	0.5	2
Draft Claimant Giancarlo Blanco's Exchange of Information (Filed 2.21.24)	0.5	0.5	0.5	0.5	2
Draft Claimant Giancarlo Blanco's Rule 41 Exchange of Information (Filed 2.21.24)	0.5	0.5	0.5	0.5	2
Draft Joint Stipulation to Stay Arbitration Proceedings (Filed 6.5.24)	0.7	0.6	0.6	0.6	2.5
Review Arbitrator Robert J. Kane, Esq.'s Order Granting Stipulation to Stay Arbitration Proceedings (Filed 6.6.24)	0.1	0.1	0.1	0.1	0.4
Draft Joint [Proposed] Revised Scheduling Order (Filed 7.16.24)	0.9	1.2	0.7	0.5	3.3

Review AAA's Revised Scheduling Order (Filed 7.25.24)	0.4	0.4	0.4	0.4	1.6
Appearances (Case No. 1:23-CV-00979-DAD-AC)					
Prepare for and Attend Joint Scheduling Conference (via Zoom on November 8, 2023)	0	0	0	1.5	1.5
Prepare for and Attend Plaintiffs' Motion for Final Approval of Class Action Settlement Hearing (Anticipated)	2	0	0	0	2
Appearances (Case No. CVRI2301163)					
Prepare for and Attend Hearing on Defendant's Motion to Compel Arbitration and Initial Case Management Conference (via Zoom on July 25, 2023)	1.5	0	0	0	1.5
Prepare for and Attend Post-Arbitration Status Hearing (via Zoom on July 25, 2024)	0	0	0	1.5	1.5
Prepare for and Attend Order to Show Cause re: Dismissal and Post-Arbitration Status Conference (Anticipated)	0	0	0	1.5	1.5
Appearances (Case No. 01-23-0003-5132)					
Prepare for and Attend Arbitration Management Conference (via Telephonic Appearance on January 11, 2024)	0	0	0	1.5	1.5
Discovery and Depositions (Case No. CVRI2301163)					
Draft Letter to Defense Counsel Re: Request for Personnel File, Pay Stubs and Time Records for Plaintiff Giancarlo Blanco and Aggrieved Employees Andrea Vanscyoc, Coral Knipp, Ulises Cardenas, Ivan Garcia and Valerie Sosa	0.8	0.3	0.4	1.1	2.6
Review and Analyze Plaintiff Giancarlo Blanco and Aggrieved Employees Andrea Vanscyoc, Coral Knipp, Ulises Cardenas, and Valerie Sosa's Personnel File, Pay Stubs, and Time Records Produced by Defendant RDO Equipment Co.	1.8	1.2	1.1	2.4	6.5
Discovery and Depositions (Case No. 01-23-0003-5132)					
Draft Letter to Defense Counsel Re: Request for Personnel File, Pay Stubs and Time Records for Claimant Giancarlo Blanco	0.8	0.3	0.4	0.3	1.8

Review and Analyze Claimant Giancarlo Blanco Personnel File, Pay Stubs, and Time Records Produced by Defendant RDO Equipment Co.	1.5	0.9	0.8	1.9	5.1
Draft Claimant Giancarlo Blanco's Requests for Admission (Set One), Requests for Production of Documents (Set One), and Special Interrogatories (Set One) to Respondent RDO Equipment Co. (Propounded 3.20.24)	0.2	0.8	2	1.5	4.5
Review and Analyze Respondent RDO Equipment Co.'s Requests for Production of Documents and Special Interrogatories to Claimant Giancarlo Blanco (Served 3.20.24)	0.8	0.3	0.4	1.4	2.9
Mediation and Settlement					
Draft Mediation Information Letter to Defense Counsel Dated May 10, 2024	0.6	0.6	1.3	1.1	3.6
Review Analyze Documents and Data Produced by RDO Equipment Co. in Response to the Mediation Information Letter, including Sample Time Keeping and Corresponding Pay Records	6.9	8.4	9.4	10.9	35.6
Prepare for Mediation, including Research Merits of Claims, Performing Damages Analysis, Drafting Mediation Brief, and Compiling Mediation Exhibits and Putative Class Members Declarations	7.2	9.1	7.7	8.4	32.4
Prepare for and Attend Mediation with Mediator David Rotman (Via Zoom on 7.9.24)	8.5	8.5	8.5	8.5	34
Prepare for and Attend Second Mediation with Mediator David Rotman (Via Zoom on 9.11.24)	4	4	4	4	16
Negotiate, Draft, and Finalize Settlement Agreement Terms with Defense Counsel; Meet and Confer and Revise Settlement Agreement and Class Notice	3.5	1.1	1.8	3.4	9.8
Coordinate Settlement Administration with Settlement Administrator; Ongoing Monitoring of Settlement Administration; Respond to Class Member Inquiries; Communicate with Class Member Re: Deadline and Claims Procedures	2.5	0.8	0.6	0.8	4.7
Letters and Correspondence (Case No. 1:23-CV-00979-DAD-AC)					
Review Court's Letter Regarding Consent to Magistrate Judge (Sent 9.28.23)	0.1	0.1	0.1	0.1	0.4
Letters and Correspondence (Case No. CVRI2301163)					

Draft Amended Notice to State of California Labor & Workforce Development Agency regarding Giancarlo Blanco's Claim for Penalties Under the Labor Code Private Attorneys General Act of 2004, California Labor Code sections 2698, et seq. (Submitted to LWDA on 02.21.23)	0.4	0.5	0	0.7	1.6
Draft letter to Defense Counsel regarding Service of Complaint via Notice of Acknowledgement (3.14.23)	0.2	0.2	0.2	0.2	0.8
Review and Analyze Defendant RDO Equipment Co.'s Letter to Ivan Garcia re Payroll Records	0.2	0.2	0.2	0.1	0.7
Draft Correspondence to, and Respond to Correspondence from, Telephone conference calls with Defense Counsel throughout the Pendency of the Lawsuit	10.7	12.1	10.7	17.1	50.6
Letters and Correspondence (Case No. CVRI2301163)					
Review American Arbitration Association's Letter re Filing Fees (Filed 8.28.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re Respondent's Filing Fees (Filed 9.20.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Resumes of Arbitrators (Filed 9.22.23)	0.5	0.5	0.5	0.5	2
Review American Arbitration Association's Letter re Initiation of Arbitration (Filed 9.22.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re Checklist for Conflicts (Filed 9.22.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re List of Arbitrators (Filed 9.22.23)	0.5	0.5	0.5	0.5	2
Review American Arbitration Association's Letter re Cybersecurity & Checklist (Filed 9.22.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re Checklist for Conflicts (Filed 10.16.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's California Arbitrator Oath Form (Filed 10.26.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Notice of Compensation Arrangements (Filed 10.26.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re Additional Disclosures (Filed 10.27.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re Appointment of Arbitrator Charles "Ted" Matthews (Filed 10.27.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Provider Organization Disclosure Report (Filed 10.27.23)	0.1	0.1	0.1	0.1	0.4

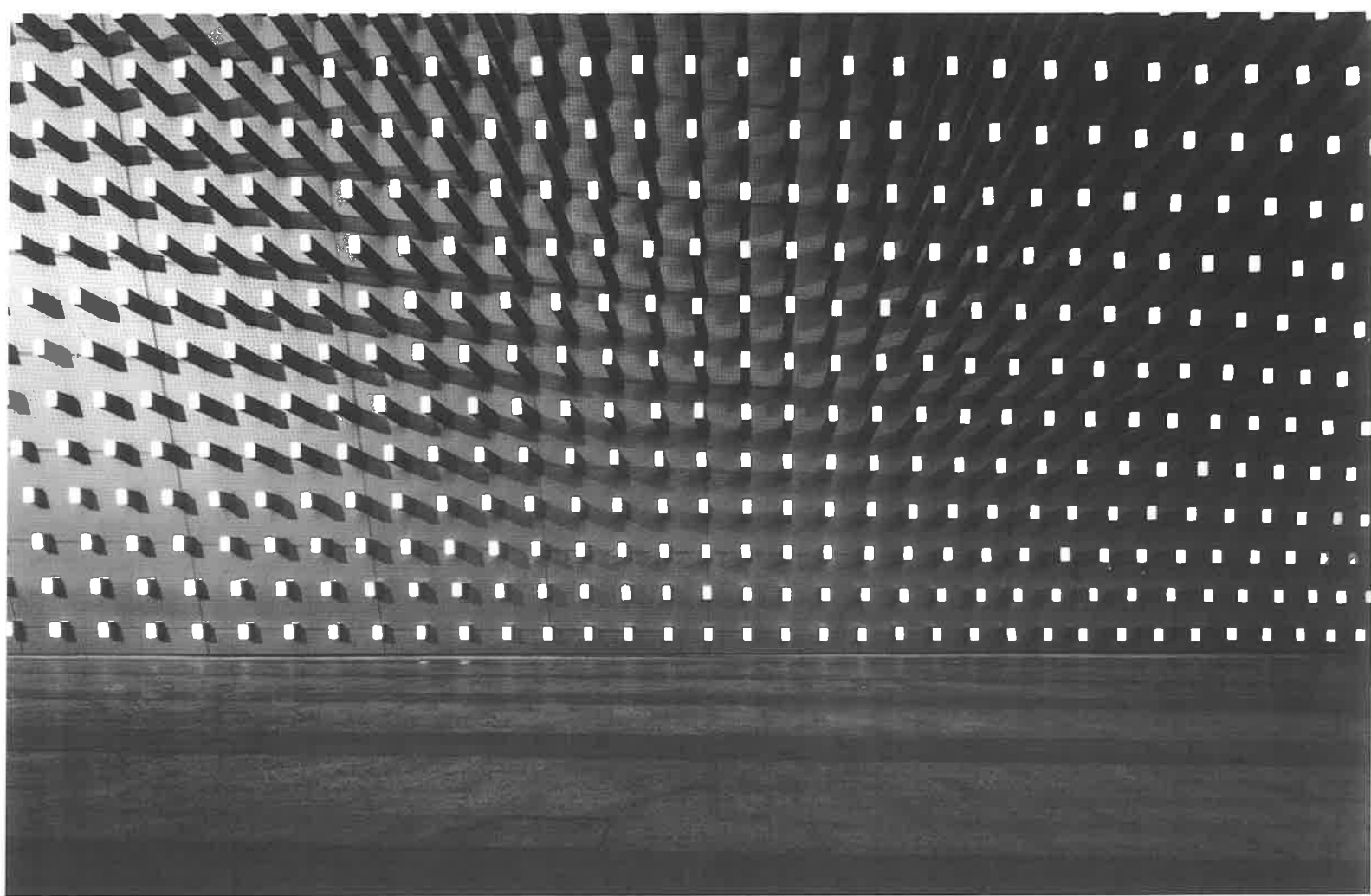
Review American Arbitration Association's Letter re Additional Disclosures (Filed 11.29.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's California Arbitrator Oath Form (Filed 11.29.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's California Neutral Database Search Results (Filed 11.29.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Notice of Compensation Arrangements (Filed 11.29.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re Appointment of Arbitrator Robert J. Kane, Esq. (Filed 11.30.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re January 11, 2024 Arbitration Management Conference (Filed 12.19.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter Arbitration Management Conference Guide (Filed 12.19.23)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re Respondent's Case Management Fees (Filed 1.3.24)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter Confirming January 11, 2024 Arb Management Conference (Filed 1.17.24)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re September 23-25, 2024 Evidentiary Hearing (Filed 1.17.24)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re Respondent's Compensation of Arbitrator (Filed 1.24.24)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re Amendment to Scheduling Order No. 1 (Filed 4.24.24)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re Supplemental Disclosures (Filed 7.18.24)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re 1.27.25 Arb Management Conference (Filed 7.25.24)	0.1	0.1	0.1	0.1	0.4
Review American Arbitration Association's Letter re January 27-29 Evidentiary Hearing (Filed 7.25.24)	0.1	0.1	0.1	0.1	0.4

Review American Arbitration Association's Letter re Affirmation of Arbitrator Robert Kane (Filed 8.5.24)	0.1	0.1	0.1	0.1	0.4
Law and Motion (Case No. CV-23-002243)					
Review and Analyze Defendant RDO Equipment Co.'s Notice of Demurrer and Demurrer to Complaint (Filed 5.26.23)	0.5	0.5	0	0.5	1.5
Review and Analyze Defendant RDO Equipment Co.'s Notice of Motion and Motion to Compel Arbitration (Filed 5.26.23)	0.5	0.5	0	0.5	1.5
Review and Analyze Defendant RDO Equipment Co.'s Notice of Removal to the United States Court for the Eastern District of California (Filed 6.28.23)	0.2	0.2	0.2	0.2	0.8
Review and Analyze Plaintiff's Response to Defendant RDO Equipment Co.'s Demurrer to Complaint (Filed 7.5.23)	1.5	1.2	0	1	3.7
Review and Analyze Plaintiff's Response to Defendant RDO Equipment Co.'s Motion to Compel Arbitration (Filed 7.5.23)	1.1	0.9	0	0.8	2.8
Law and Motion (Case No. 1:23-CV-00979-DAD-AC)					
Review and Analyze Defendant RDO Equipment Co.'s Notice of Removal to Federal Court and Supporting Documents (Filed 6.29.23)	0.5	0.5	0	0.5	1.5
Review and Analyze Defendant RDO Equipment Co.'s Notice of Motion and Motion to Compel Individual Arbitration and Dismiss or Stay Action; Request for Judicial Notice in Support Thereof; Declaration of Emily Keeling in Support Thereof; and Declaration of Alex E. Spjute in Support Thereof (Filed 7.10.23)	0.5	0.5	0	0.5	1.5
Review and Analyze Plaintiff Simon Munoz's Opposition to Defendant RDO Equipment Co.'s Motion to Compel Individual Arbitration and Dismiss or Stay Action and Declaration of David Mara, Esq. in Support Thereof (Filed 7.24.23)	1.5	1.2	0.5	1	4.2
Review and Analyze Defendant RDO Equipment Co.'s Reply to Plaintiff Simon Munoz's Opposition to Defendant's Motion to Compel Individual Arbitration and Stay Proceedings (Filed 8.3.23)	0.5	0.5	0.5	0.5	2
Draft Declaration of Douglas Han in Support of Plaintiff Simon Munoz and Giancarlo Blanco's Notice of Motion and Motion for Preliminary Approval of Class and PAGA Action Settlement and Declaration of Giancarlo Blanco in Support Thereof (Filed 12.7.24)	2.9	0.5	0.1	0.3	3.8

Review and Analyze Plaintiff Simon Munoz and Giancarlo Blanco's Notice of Motion and Motion for Preliminary Approval of Class and PAGA Action Settlement; Declaration of Douglas Han in Support Thereof; Declaration of David Mara in Support Thereof; Declaration of Simon Munoz in Support Thereof; Declaration of Giancarlo Blanco in Support Thereof; and [Proposed] Order Granting Plaintiffs' Motion and Motion for Preliminary Approval of Class Action Settlement (Filed 12.17.24)	4.7	0.8	0	1.1	6.6
Draft Declaration of Douglas Han in Support of Plaintiff Simon Munoz and Giancarlo Blanco's Notice of Motion and Motion for Final Approval of Class and PAGA Action Settlement (Anticipated)	2.2	0	0	0.2	2.4
Review and Analyze Plaintiff Simon Munoz and Giancarlo Blanco's Notice of Motion and Motion for Final Approval of Class and PAGA Action Settlement, Attorneys' Fees, Costs, and Service Payments Briefing and Supporting Documents (Anticipated)	2.1	1.9	0	1.2	5.2
Law and Motion (Case No. 24-2356)					
Review and Analyze Appellant RDO Equipment Co.'s Motion to Extend Time to File Opening Brief (Filed 5.9.24)	1	0	0	1	2
Law and Motion (Case No. CVRI2301163)					
Review and Analyze Defendant RDO Equipment Co.'s Motion to Compel Individual Arbitration and Stay Proceedings, Declaration of Kate Moore in Support of Defendant RDO Equipment Co.'s Motion to Compel Arbitration and Stay Proceedings, Request for Judicial Notice in Support of Defendant RDO Equipment Co.'s Motion to Compel Individual Arbitration and Stay Proceedings, [Proposed] Order Granting Defendant RDO Equipment Co.'s Motion to Compel Individual Arbitration and to Stay Proceedings and Proof of Service (Filed 5.1.23)	1.5	0.5	0.5	1	3.5
Review and Analyze Defendant RDO Equipment Co.'s [Proposed] Order Granting Motion to Compel Individual Arbitration and to Stay Proceedings and Proof of Service (Filed 5.18.23)	0.1	0.1	0.1	0.1	0.4
Draft Plaintiff Giancarlo Blanco's Opposition to Defendant RDO Equipment Co.'s Motion to Compel Arbitration, Evidentiary Objections, Declaration of Giancarlo Blanco and Proof of Service (Filed 7.12.23)	1.5	1.2	0.8	0.8	4.3
Review and Analyze Defendant RDO Equipment Co.'s Reply in Support of their Motion to Compel Arbitration (Filed 7.18.23)	0.3	0.5	0.3	0.5	1.6
Review and Analyze Defendant RDO Equipment Co.'s Proposed Order Granting Motion to Compel Individual Arbitration (Cover Sheet) (Filed 7.28.23)	0.1	0.1	0.1	0.1	0.4

Review and Analyze Defendant RDO Equipment Co.’s Proposed Order Granting Motion to Compel Individual Arbitration and Proof of Service (Filed 7.31.23)	0.1	0.1	0.1	0.1	0.4
Total Hour Per Lawyer:	141.9	125.3	97.4	146.2	-
Total Hours Combined:	510.8				

EXHIBIT 2



ELM Solutions

2022 Real Rate Report[®]

The industry's leading
analysis of law firm rates,
trends, and practices

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A Letter to Our Readers

Welcome to the Wolters Kluwer ELM Solutions Real Rate Report®, the industry's leading data-driven benchmark report for lawyer rates.

Our Real Rate Report has been a relied upon data analytics resource to the legal industry since its inception in 2010 and continues to evolve. The Real Rate Report is powered by the Wolters Kluwer ELM Solutions LegalVIEW® data warehouse, which has grown to include \$155B+ in anonymized legal data.

Last year, we launched our LegalVIEW Insights report series, which presented the first-of-its-kind legal analysis of total outside spend, vendor counts, staffing ratios, and other matters. This year, LegalVIEW Insights has gone even deeper into these issues and, together with the Real Rate Report, is a great tool to benchmark performance and improve from there.

The legal services industry relies on internal analytics and the use of external data resources, such as the LegalVIEW data warehouse, to support legal management strategies. The depth and details of the data in the Real Rate Report enable you to better benchmark and make more informed investment and resourcing decisions for your organization.

As with past Real Rate Reports, all of the data analyzed are from corporations' and law firms' e-billing and time management solutions. We have included lawyer and paralegal rate data filtered by specific practice and sub-practice areas, metropolitan areas, and types of matters to give legal departments and law firms greater ability to pinpoint areas of opportunity. We strive to make the Real Rate Report a valuable and actionable reference tool for legal departments and law firms.

As always, we welcome your comments and suggestions on what information would make this publication more valuable to you. We thank our data contributors for participating in this program. And we thank you for making Wolters Kluwer ELM Solutions your trusted partner for legal industry domain expertise, data, and analytics and look forward to continuing to provide market-leading, expert solutions that deliver the best business outcomes for collaboration among legal departments and law firms.

Sincerely,



Barry Ader

Vice President, Product Management and Marketing
Wolters Kluwer ELM Solutions

Report Use Considerations

2022 Real Rate Report

- Examines law firm rates over time
- Identifies rates by location, experience, firm size, areas of expertise, industry, and timekeeper role (i.e., partner, associate, and paralegal)
- Itemizes variables that drive rates up or down

All the analyses included in the report derive from the actual rates charged by law firm professionals as recorded on invoices submitted and approved for payment.

Examining real, approved rate information, along with the ranges of those rates and their changes over time, highlights the role these variables play in driving aggregate legal cost and income. The analyses can energize questions for both corporate clients and law firm principals.

Clients might ask whether they are paying the right amount for different types of legal services, while law firm principals might ask whether they are charging the right amount for legal services and whether to modify their pricing approach.

Some key factors¹ that drive rates²:

Attorney location - Lawyers in urban and major metropolitan areas tend to charge more when compared with lawyers in rural areas or small towns.

Litigation complexity - The cost of representation will be higher if the case is particularly complex or time-consuming; for example, if there are a large number of documents to review, many witnesses to depose, and numerous procedural steps, the case is likely to cost more (regardless of other factors like the lawyer's level of experience).

Years of experience and reputation - A more experienced, higher-profile lawyer is often going to charge more, but absorbing this higher cost at the outset may make more sense than hiring a less expensive lawyer who will likely take time and billable hours to come up to speed on unfamiliar legal and procedural issues.

Overhead - The costs associated with the firm's support network (paralegals, clerks, and assistants), document preparation, consultants, research, and other expenses.

Firm size - The rates can increase if the firm is large and has various timekeeper roles at the firm. For example, the cost to work with an associate or partner at a larger firm will be higher compared to a firm that has one to two associates and a paralegal.

¹ David Goguen, J.D., University of San Francisco School of Law (2020) Guide to Legal Services Billing Retrieved from: <https://www.lawyers.com/legal-info/research/guide-to-legal-services-billing-rates.html>

² Source: 2018 RRR. Factor order validated in multiple analyses since 2010

Section I: High-Level Data Cuts

Cities

By Matter Type

2022 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2022	2021	2020
Jackson MS	Litigation	Associate	56	\$55	\$225	\$250	\$178	\$203	\$175
		Partner	24	\$315	\$420	\$485	\$418	\$394	\$375
	Non-Litigation	Associate	25	\$55	\$126	\$255	\$155	\$125	\$259
Kansas City MO	Litigation	Partner	74	\$413	\$450	\$556	\$472	\$450	\$450
		Associate	50	\$252	\$329	\$385	\$319	\$316	\$305
	Non-Litigation	Partner	101	\$411	\$487	\$615	\$519	\$487	\$464
		Associate	73	\$250	\$320	\$385	\$322	\$312	\$285
Las Vegas NV	Non-Litigation	Partner	20	\$350	\$425	\$525	\$440	\$422	\$432
		Associate	11	\$238	\$267	\$368	\$301	\$297	\$282
Little Rock AR	Non-Litigation	Partner	11	\$215	\$215	\$308	\$264	\$256	\$298
Los Angeles CA	Litigation	Partner	322	\$516	\$725	\$1,045	\$799	\$739	\$702
		Associate	408	\$400	\$615	\$855	\$642	\$606	\$564
	Non-Litigation	Partner	521	\$596	\$868	\$1,201	\$903	\$902	\$858
		Associate	667	\$441	\$603	\$845	\$653	\$712	\$648

Section I: High-Level Data Cuts

Cities

By Years of Experience

2022 - Real Rates for Associate

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2022	2021	2020
Kansas City MO	3 to Fewer Than 7 Years	15	\$270	\$325	\$360	\$318	\$295	\$283
	7 or More Years	28	\$292	\$334	\$391	\$333	\$312	\$302
Los Angeles CA	Fewer Than 3 Years	63	\$429	\$595	\$654	\$556	\$524	\$488
	3 to Fewer Than 7 Years	144	\$486	\$688	\$838	\$662	\$626	\$530
	7 or More Years	171	\$351	\$550	\$840	\$600	\$634	\$586
Miami FL	3 to Fewer Than 7 Years	19	\$300	\$360	\$457	\$380	\$331	\$313
	7 or More Years	36	\$295	\$450	\$595	\$460	\$433	\$385
Minneapolis MN	Fewer Than 3 Years	11	\$374	\$405	\$446	\$408		\$230
	3 to Fewer Than 7 Years	27	\$340	\$451	\$510	\$421	\$358	\$356
	7 or More Years	27	\$423	\$468	\$585	\$478	\$438	\$392
Nashville TN	7 or More Years	12	\$219	\$245	\$345	\$282	\$266	\$262
New Orleans LA	3 to Fewer Than 7 Years	12	\$232	\$243	\$265	\$261	\$242	\$245
	7 or More Years	18	\$243	\$312	\$343	\$306	\$318	\$294
New York NY	Fewer Than 3 Years	142	\$443	\$622	\$775	\$629	\$600	\$652

Section I: High-Level Data Cuts

Cities

By Years of Experience

2022 - Real Rates for Partner

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2022	2021	2020
Kansas City MO	Fewer Than 21 Years	46	\$400	\$450	\$537	\$473	\$411	\$397
	21 or More Years	68	\$440	\$553	\$658	\$539	\$497	\$491
Las Vegas NV	Fewer Than 21 Years	12	\$284	\$381	\$495	\$389	\$349	\$343
	21 or More Years	13	\$350	\$425	\$515	\$468	\$456	\$472
Los Angeles CA	Fewer Than 21 Years	183	\$533	\$801	\$1,075	\$804	\$797	\$682
	21 or More Years	333	\$550	\$765	\$1,133	\$863	\$842	\$808
Memphis TN	Fewer Than 21 Years	14	\$288	\$331	\$380	\$345	\$317	\$328
	21 or More Years	15	\$355	\$415	\$425	\$394	\$382	\$375
Miami FL	Fewer Than 21 Years	57	\$370	\$450	\$598	\$490	\$498	\$443
	21 or More Years	104	\$388	\$581	\$749	\$584	\$580	\$536
Milwaukee WI	21 or More Years	16	\$302	\$454	\$613	\$589	\$515	\$530
Minneapolis MN	Fewer Than 21 Years	36	\$470	\$530	\$607	\$532	\$486	\$499
	21 or More Years	84	\$507	\$675	\$796	\$656	\$620	\$589
Nashville TN	Fewer Than 21 Years	28	\$375	\$405	\$535	\$449	\$405	\$397

Section I: High-Level Data Cuts

Cities

By Matter Type

2022 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Role	n	First Quartile	Median	Third Quartile	2022	2021	2020
Las Vegas NV	Associate	15	\$250	\$308	\$361	\$314	\$313	\$283
	Partner	16	\$215	\$250	\$311	\$271	\$260	\$287
Little Rock AR	Associate	17	\$150	\$150	\$185	\$173	\$171	\$188
	Partner	743	\$550	\$825	\$1,140	\$863	\$844	\$796
Los Angeles CA	Associate	1007	\$429	\$610	\$847	\$649	\$676	\$618
	Partner	22	\$265	\$325	\$360	\$326	\$343	\$339
Louisville KY	Associate	20	\$196	\$248	\$271	\$240	\$232	\$232
	Partner	11	\$378	\$425	\$535	\$447	\$426	\$437
Madison WI	Partner	30	\$290	\$359	\$425	\$365	\$349	\$354
Memphis TN	Associate	156	\$271	\$387	\$476	\$393	\$379	\$372
	Partner	214	\$364	\$528	\$688	\$542	\$535	\$504
Miami FL	Associate	23	\$265	\$290	\$361	\$312	\$310	\$300
	Partner	36	\$290	\$375	\$464	\$448	\$449	\$448
Milwaukee WI	Associate	168	\$454	\$626	\$728	\$611	\$576	\$543
	Partner	168	\$454	\$626	\$728	\$611	\$576	\$543
Minneapolis MN	Partner	168	\$454	\$626	\$728	\$611	\$576	\$543

EXHIBIT 3

LAFFEY MATRIX

History

Case Law

See the Matrix

Contact us

Home

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406

6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $\frac{1}{2}$ Years Out of Law School $\frac{1}{2}$ is calculated from June 1 of each year, when most law students graduate. $\frac{1}{2}$ 1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $\frac{1}{2}$ 4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $\frac{1}{2}$ 1-3" from June 1, 1996 until May 31, 1999, would move into tier $\frac{1}{2}$ 4-7" on June 1, 1999, and tier $\frac{1}{2}$ 8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT 4

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Jill Vecchi
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May 26, 2023

Douglas Han, Esq.
JUSTICE LAW CORPORATION
751 N. Fair Oaks Ave., Suite 101
Pasadena, California 91103

Re: *RDO Equipment Co.*

JOINT PROSECUTION AGREEMENT

WHEREAS Plaintiff Giancarlo Blanco through his attorneys Justice Law Corporation (“JLC”), filed a PAGA action, which is currently pending before the Riverside County Superior Court, Case No. CVRI2301163 (“*Blanco Action*”).

WHEREAS Plaintiff Simon Munoz, through his attorneys Mara Law Firm, PC (“MLF”), filed a PAGA action, which is currently pending before the Stanislaus County Superior Court, Case No. CV-23-002243 (“*Munoz Action*”).

WHEREAS Plaintiff Simon Munoz agreed to join the *Blanco Action* as a Plaintiff.

WHEREAS Plaintiff Simon Munoz will amend his complaint to add in class claims and to withdraw his PAGA claims.

WHEREAS the Parties and counsel to each case believe it is in the Parties’ and their counsel’s best interest to continue to work together for the common good of the class members.

IT IS HEREBY AGREED THAT:

1. The Parties and their Counsel agree to jointly pursue the claims asserted in the *Blanco* and *Munoz* Actions and that JLC and MLF serve as co-lead counsel in the above-described action.
2. The Plaintiffs will execute this agreement which shall become part of the retainer agreements with Blanco and Munoz, reflecting the agreement reached herein.
3. The Parties will coordinate their activities in connection with this joint representation agreement and they will keep each other informed of all material developments and shall share responsibility for oversight and the conduct of day-to-day activities in this litigation.

4. The Parties and their counsel will cooperate and make their best efforts to effectuate the recovery of reasonable costs and fees in the event of the successful prosecution and/or settlement of the underlying actions or any portion thereof. At that time and in that event, each of the parties' counsel shall submit to the Court their costs and time sheets quantifying and describing the general nature of all common benefit work performed by the respective law firm on behalf of the Plaintiffs in such action and/or on behalf of the putative class. Notwithstanding the foregoing, and regardless of the number of the hours worked by each firm, it is hereby agreed that the Parties shall share in any recovery as follows:

Attorneys' fees recovered in this action shall be divided and paid as follows:

JLC	50%
MLF	50%

5. This division of fees will not increase the fees paid by the representative plaintiffs or the class.

6. JLC and MLF each warrant that at this time they do not have reason to believe that any other firm or attorney will seek fees for work completed on behalf of their respective clients, and furthermore, that should any other firm or attorney make a claim for fees for work which was completed prior to the date of this agreement or hereinafter, on the behalf of one of the representative clients or parties, each party shall be solely responsible for defending against said claims.

7. Each party will bear its own costs in conducting this litigation including firm overheads, telephone, rent, travel, meals, etc.

8. Third-party costs incurred specifically to support this litigation including expert fees, transcripts, reproduction of written and electronic discovery, etc. will be shared by the parties in the following ratios:

JLC	50%
MLF	50%

9. The Parties shall each receive reimbursement of their expenses as approved by the Court. Should the court award expenses in an amount less than that sought by the Parties, the expense award shall be divided *pro rata* based on the relative amounts of expenses submitted to the Court by each of the parties, unless the Court expressly concludes that particular defects in the submission of specific expenses made by a particular party is the reason for failing to approve an expense; in which case the loss shall be borne entirely by the party who submitted the particular expense that was not approved.

10. Any disputes under this Agreement shall be submitted to the Stanislaus County Superior Court and will be governed by the laws of State of California.

11. This Agreement is made among Firms authorized to practice under the laws of the State of California and is intended to be governed by the ethical rules of California. In the event that any portion of this Agreement shall be held to be unenforceable, the remaining portions shall remain in force and effect and to give effect to the overall intention of fostering cooperation among counsel to best serve the interests of the clients.

12. In the event that any portion of this Agreement shall be held to be unenforceable, the remaining portions shall remain in force and effect.

13. This Agreement is the entire agreement between the Parties, and it supersedes any previous negotiations, agreements and understandings concerning the subject matters of this Agreement. This Agreement is intended to be and is final and binding. No modifications of this Agreement can be made except in writing signed by each of the Parties.

IN WITNESS WHEREOF, the undersigned have duly authorized and caused this Agreement to be executed:

05/26/2023

Date: May __, 2023

Giancarlo Blanco



Plaintiff

Date: May __, 2023

Simon Munoz


Plaintiff

Date: May 30, 2023

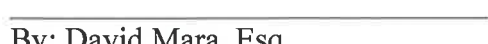
JUSTICE LAW CORPORATION



By: Douglass Han, Esq.

Date: May __, 2023

MARA LAW FIRM, PC


By: David Mara, Esq.

11. This Agreement is made among Firms authorized to practice under the laws of the State of California and is intended to be governed by the ethical rules of California. In the event that any portion of this Agreement shall be held to be unenforceable, the remaining portions shall remain in force and effect and to give effect to the overall intention of fostering cooperation among counsel to best serve the interests of the clients.

12. In the event that any portion of this Agreement shall be held to be unenforceable, the remaining portions shall remain in force and effect.

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IN WITNESS WHEREOF, the undersigned have duly authorized and caused this Agreement to be executed:

Date: May __, 2023

Giancarlo Blanco

Plaintiff

Date: May __, 2023

Simon Munoz

DocuSigned by:



Plaintiff

Date: May __, 2023

JUSTICE LAW CORPORATION

By: Douglass Han, Esq.

Date: May __, 2023

MARA LAW FIRM, PC

DocuSigned by:



By: David Mara, Esq.

EXHIBIT 5

Cases	Court	Case Number	Judge
Rodney Hoffman v. Blattner Energy Inc.	United States District Court of California Central District	ED CV 14-2195-DMG (DTBx)	Dolly Gee
Nabor Navarro v. Trans-West Intermodal, Inc.	San Bernardino County Superior Court	CIVDS1700850	Brian McCarville
Caryn Rafferty et al. v. Academy Mortgage Corporation	Sacramento County Superior Court	34-2016-00191285-CU-OE-GDS	David Brown
Carrie Baker v. Central Coast Home Health	San Luis Obispo County Superior Court	17CV-0219	Tana Coates
Jamar Farmer v. Cooks Collision, Inc.	Napa County Superior Court	17CV000969	Diane Price
Ricardo Ortega et al. v. Nestle Waters North America, Inc.	Los Angeles County Superior Court	BC623610	Carolyn Kuhl
Landon Fulmer, Jr. et al. v. Golden State Drilling, Inc.	Kern County Superior Court	S-1500-CV0279707-SDS	Stephen Schuett
Carlos McCollum et al. v. Delta Tech Service, Inc.	Solano County Superior Court	FCS049504	Scott Daniels
Carl Morel et al. v. Aseptic Solutions USA Ventures, LLC	Riverside County Superior Court	RIC1711383	Craig Riemer
Genio Chuen v. 911 Mobile Mechanic, LLC	Orange County Superior Court	30-2017-00943421-CU-OE-CXC	Glenda Sanders
Elbern Gentry v. Eugene Burger Management Corporation	Sacramento County Superior Court	34-2015-00182515-CU-OE-GDS	David Brown
Maurice Bunche et al. v. Mettler-Toledo Rainin, LLC	Alameda County Superior Court	RG18899279	Winifred Smith
Carlos Koreisz et al. v. On Q Financial, Inc	Ventura County Superior Court	56-2018-00511 126-CU-OE-VTA	Mark Borrell
Jason Manas et al. v. Kenai Drilling Limited	Los Angeles County Superior Court	BC546330	Daniel Buckley
Michelle Xiong et al. v. Hilltop Ranch, Inc.	Merced County Superior Court	18CV-01340	Brian McCabe
Karen Morgan v. Childtime Childcare, Inc.	United States District Court of California Central District	8:17-cv-01641 AG (KESx)	Andrew Guilford
Daniel Flores v. Wilmar Oils & Fats (Stockton), LLC	San Joaquin County Superior Court	STK-CV-UOE-2018-0012758	Barbara Kronlund
Jordan Dahlberg et al. v. Fresno Beverage Company dba Valley Wide Beverage	Tulare County Superior Court	VCU279083	Bret Hillman
Jorge Proctor v. Helena Agri Enterprises, LLC	San Diego County Superior Court	37-2018-00057894-CU-OE-CTL	Joel Wohlfeil
Christine Arman v. Circor Aerospace, Inc.	Riverside County Superior Court	RIC1613578	Sunshine Sykes
Anthony Nuncio et al. v. MMI Services, Inc.	Kern County Superior Court	S-1500-CV-282534	David R. Lampe
Mario R. Guerrero et al. v. Plaza Home Mortgage, Inc.	Imperial County Superior Court	ECU001150	L. Brooks Anderholt
Mansour Nije v. Lucira Health, Inc. f/k/a Diassess, Inc.	Alameda County Superior Court	RG20055890	Julia A. Spain
Patricial Alcantar et al v. Bay Equity, LLC	Marin County Superior Court	CIV1903376	James Chou
Efrain Perez v. Freedom Medical, Inc.	San Bernardino County Superior Court	CIVDS1903517	Bryan F. Foster
Beverly Saolom v. Pulmonox Corporation	San Mateo County Superior Court	19-CIV-05070	Nancy Fineman
Matthew Tucker v. BYD Coach & Bus, LLC	Los Angeles County Superior Court	BC698921	Amy Hogue
Jose Duval v. Dawson Oil Company	Sacramento County Superior Court	34-2020-00276862-CU-OE-GDS	Shama H. Mesiwala
Steven DelCorso v. Westland Technologies, Inc.	Stanislaus County Superior Court	CV-20-002807	John R. Mayne
Priscilla Ramirez v. Amphastar Pharmaceuticals, Inc.	San Bernardino County Superior Court	CIVDSZO11327	David Cohn
Jose Zuniga v. Central Valley Concrete, Inc.	Merced County Superior Court	20CV-00490	Brian McCabe
Robert Enriquez v. MCE Corporation	Contra Costa County Superior Court	MSC20-01744	Edward Weil
Amanda Cunningham v. Cottonwood H.C., Inc. dba Cottonwood Post-Acute Rehab	Yolo County Superior Court	CV2021-1375	Daniel M. Wolk
Nguyen Ngo, et al. v. Medimpact Healthcare Systems, Inc.	San Diego County Superior Court	37-2020-00015657-CU-OE-CTL	Keri Katz
Steven Jefferson v. McCormack Baron Management, Inc.	San Francisco County Superior Court	CGC-20-588162	Richard B. Ulmer Jr.
Allen Morgan v. Wehah Farm, Inc dba Lundberg Family Farms	Butte County Superior Court	20CV02554	Stephen E. Benson
Earl Rhodes, et al. v. Cavotec Dabico US Inc., et al.	Orange County Superior Court	30-2021-01177305-CU-OE-CXC	Peter Wilson
Alexandra Pelgrift v. The 21st Amendment Brewery Cafe	San Francisco County Superior Court	CGC-20-585227	Ethan P. Schulman
Beverly Salom, et al. v. Lumentum Operations LLC, et al.	Santa Clara County Superior Court	19CV354198	Sunil R. Kulkarni
Leroy Rost v. Lehigh Hanson, Inc. et al.	San Luis Obispo County Superior Court	20CV-0225	Tana L. Coates
Suleni Itzep, et al. v. Axonics Modulation Technologies, Inc.	Orange County Superior Court	30-2020-01140962-CU-OE-CXC	Lon F. Hurwitz
Earl Gandionco v. Allergan, Inc. et al.	San Joaquin County Superior Court	STK-CV-UOE-2022-0003077	Robert T. Waters
Kris Brehm, et al. v. Platinum Living Services, Inc. dba Oakwood Village	Placer County Superior Court	S-CV-0046296 (Consolidated with S-CV-0046676)	Michael Jones
Jarid Gomez, et al. v. Parker-Hannifin Corporation	Ventura County Superior Court	56-2022-00563952-CU-OE-VTA	Benjamin Coats
Ana Vargas, et al. v. Spates Fabricators, Inc.	Riverside County Superior Court	CVRI2100462	Harold W. Hopp
Jacob Blea v. Pacific Groservice Inc., et al.	Santa Clara County Superior Court	20CV275150	Sunil R. Kulkarni
Anthony Penca v. Sierra Nevada Brewing Co.	Butte County Superior Court	21CV02883	Tamara L. Mosbarger
Armoni Lloyd v. National Warehouse Management, LLC	Kern County Superior Court	BCV-22-102213	David R. Zulfa
Edgar Mata, et al. v. Day-Lee Foods Inc.	Los Angeles County Superior Court	20STCV21663	Kenneth R. Freeman
Samyra McCrea v. Rockridge Market Hall, LLC dba Market Hall Foods, et al.	Alameda County Superior Court	22CV005647	Evelio Grillo
Sarah Chasen, et al. v. Alliance Building Services, LLC (WA)	King County Superior Court	24-2-02041-1	Cindi Port
Joshua King v. Beacon Sales Acquisition, Inc. (WA)	King County Superior Court	22-2-14226-0 SEA	Marshall L. Ferguson

EXHIBIT 6

JUSTICE LAW CORPORATION CASE COST DETAIL
RDO Equipment Co. adv. Munoz

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
3/8/2023	OneLegal	Filing & Filing Fee	\$ 1,510.02
3/14/2023	United States Postal Service	Service of Process	\$ 5.34
3/27/2023	United States Postal Service	Service of Documents	\$ 2.99
3/28/2023	OneLegal	Filing	\$ 17.24
4/4/2023	OneLegal	Filing	\$ 17.24
4/28/2023	United States Postal Service	Service of Documents	\$ 3.23
4/28/2023	OneLegal	Filing	\$ 17.24
5/1/2023	United States Postal Service	Service of Documents	\$ 2.09
5/1/2023	OneLegal	Filing	\$ 17.24
5/25/2023	United States Postal Service	Service of Documents	\$ 1.63
5/25/2023	OneLegal	Filing	\$ 17.24
5/26/2023	SignNow	Attorney Services	\$ 5.00
6/1/2023	United States Postal Service	Service of Documents	\$ 3.70
6/6/2023	OneLegal	Filing	\$ 17.24
7/11/2023	United States Postal Service	Service of Documents	\$ 11.44
7/11/2023	OneLegal	Filing	\$ 34.48
7/12/2023	SignNow	Attorney Services	\$ 5.00
7/12/2023	General Logistics Systems	Service of Documents	\$ 27.62
7/13/2023	OneLegal	Filing	\$ 17.24
7/18/2023	OneLegal	Filing	\$ 17.24
7/18/2023	United States Postal Service	Service of Documents	\$ 4.24
8/8/2023	United States Postal Service	Service of Documents	\$ 7.12
8/8/2023	American Arbitration Association	Arbitration Demands	\$ 362.25
4/22/2024	Eastern District of California	Document Retrieval	\$ 0.20
6/18/2024	SignNow	Attorney Services	\$ 5.00
6/26/2024	SignNow	Attorney Services	\$ 20.00
6/28/2024	United States Postal Service	Mailing Correspondence	\$ 19.88
7/9/2024	David Rotman, Esq.	Mediation Fees	\$ 6,625.00
7/18/2024	United States Postal Service	Service of Documents	\$ 3.46
7/19/2024	OneLegal	Filing	\$ 19.30
7/31/2024	Berger Consulting Group	Expert Review and Analysis of Payroll Record:	\$ 3,460.00
9/11/2024	David Rotman, Esq.	Mediation Fees	\$ 3,312.00
11/1/2024	Public Access to Court Electronic Records	Document Retrieval	\$ 0.50
12/17/2024	Public Access to Court Electronic Records	Document Retrieval	\$ 12.90
12/19/2024	Public Access to Court Electronic Records	Document Retrieval	\$ 3.20
12/30/2024	Public Access to Court Electronic Records	Document Retrieval	\$ 0.30
2/24/2025	OneLegal	Filing	\$ 23.02
8/20/2025	United States Postal Service	Service of Documents	\$ 3.56
8/25/2025	OneLegal	Filing	\$ 23.02
	OneLegal	Document Retrieval (Anticipatory)	\$ 9.70
	OneLegal	Document Retrieval (Anticipatory)	\$ 3.20
	LexisNexis	Legal Research	\$ 1,550.00
	Justice Law Corporation (In House)	Photocopies (1746 @ \$0.15 per page)	\$ 261.90
Total Cost			\$ 17,480.21