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Attorneys for Plaintiff CHRISTIAN SANCHEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

CHRISTIAN SANCHEZ, ATU AKINLABI
WATSON, and TYRON WESLEY
MCCARTHER, individuals, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

SPOKE LOGISTICS, LLC, a Wyoming
Limited Liability Company, and Does 1-25,
Inclusive,

Defendant.

Case No. 23-CV-035138

ASSIGNED FOR ALL PURPOSES TO:
The Honorable Victoria Kolakowski
Department 16

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF SARKIS
SIRMABEKIAN, ESQ. IN SUPPORT OF
PLAINTIFFS' MOTION FOR: 1) FINAL
APPROVAL OF CLASS AND
REPRESENTATIVE ACTION
SETTLEMENT AND 2) APPROVAL OF
ATTORNEYS' FEES AND COSTS,
ADMINISTRATION COSTS, AND
CLASS REPRESENTATIVES'
ENHANCEMENT AWARDS**

Date: October 22, 2026

Time: 2:30 p.m.

Dept.: 16

Reservation: A-35138-001

Complaint filed: June 6, 2023

Trial Date: Not Set

1 SPOKE LOGISTICS, LLC, a California
2 Corporation,

3 Cross-Complainant,

4 v.

5 HE IS THE WAY TRANSPORT
6 SERVICES, INC.,

7 Cross-Defendant.

Complaint filed: September 11, 2023
Trial Date: Not Set

8 **UNITED EMPLOYEES LAW GROUP**

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11 Attorneys for Plaintiff CHRISTIAN SANCHEZ

12 **SIRMABEKIAN LAW FIRM, PC**

13 Sarkis Sirmabekian (SBN 278588)

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16 Attorneys for Plaintiffs ATU AKINLABI WATSON and TYRON WESLEY MCCARTHER

1 I, SARKIS SIRMABEKIAN, declare as follows:

2 1. I am an attorney duly licensed to practice law before all courts of the State of
3 California and am the lead attorney with the Sirmabekian Law Firm, PC, representing Plaintiffs
4 ATU AKINLABI WATSON and TYRON WESLEY MCCARTHER and co-counsel for the
5 Settlement Class in this action (“Co-Counsel”). I have personal knowledge of the matters stated
6 in this declaration and, if called as a witness, could and would competently testify thereto.

7 2. This Declaration is submitted in support of Plaintiffs’ Motion for Final Approval
8 of Class and Representative Action Settlement.

9 3. I prosecuted this class action lawsuit with Plaintiff CHRISTIAN SANCHEZ’s
10 counsel, The Markham Law Firm, Cohelan Khoury & Singer, United Employees Law Group,
11 and its attorneys (“Class Counsel”). Along with my co-counsels, I assisted in prosecuting the
12 case and reaching the settlement with the Defendant in this action.

13 4. My co-counsels and I combined our experience and skill to investigate, bring and
14 litigate this matter to a successful conclusion. By the time the settlement was reached, we had
15 conducted a significant amount of investigation to sufficiently assess the strengths and
16 weaknesses of the class claims. I have significant experience in the handling of representative
17 actions, class actions, and complex litigation matters. The combination of our firms permitted us
18 to dedicate, whenever necessary, the full extent of resources necessary to accomplish the various
19 goals for litigation, contacting and communicating with Plaintiffs, witnesses, and Class
20 Members, analyzing voluminous employment records and data, including time sheets, and wage
21 statements and preparing for the settlement negotiations.

22 5. I have practiced law since 2011 and have approximately 10+ years of experience
23 in employment law, class action and representative litigation, and complex litigation.

24 6. My practice focuses primarily on employment law, representing employees. I
25 have litigated numerous class, representative, and/or complex actions involving claims under the
26 California Labor Code, applicable Wage Orders, Business and Professions Code section 17200,
27 and PAGA.
28

1 7. I have served as lead counsel, co-lead counsel, and/or class counsel/co-counsel in
2 numerous class and representative actions, including matters involving claims for unpaid wages,
3 overtime, meal periods, rest periods, off-the-clock work, wage statements, waiting-time
4 penalties, unreimbursed business expenses, PAGA penalties, etc.

5 8. Based on my education, training, and experience litigating class and
6 representative actions, I am familiar with the factual and legal issues presented in this action, the
7 risks associated with continued litigation, the expense of class litigation, and the considerations
8 relevant to evaluating a proposed class action settlement.

9 9. My firm has worked with Class Counsel in prosecuting the action and bringing
10 the matter to resolution. Among other things, I have performed work relating to:

- 11 a. Investigation and factual development of Plaintiffs' and the Class claims;
- 12 b. Conferences and communications with Plaintiffs;
- 13 c. Review and analysis of documents and data produced by Defendant;
- 14 d. Legal research regarding the claims, defenses, damages, penalties,
15 certification issues, and other matters bearing on the potential value and
16 risks of the case;
- 17 e. Drafting/reviewing correspondences, pleadings, motions, or other filings;
- 18 f. Preparation for and participation in private mediation and settlement
19 negotiations;
- 20 g. Evaluation of Defendant's defenses and the risks of continued litigation;
- 21 h. Analysis and negotiation of the proposed Settlement;
- 22 i. Review and revision of the Settlement Agreement and related documents;
- 23 j. Preparation and/or review of the preliminary-approval papers, class notice,
24 and related materials;
- 25 k. Communications and coordination with Class Counsel concerning
26 settlement administration and final approval; and
- 27 l. Preparation and/or review of the papers supporting final approval and the
28 request for attorneys' fees and costs.

1 10. The work performed by my firm was reasonably necessary to the prosecution and
2 resolution of this matter. Throughout this litigation, I have worked with my co-counsels to avoid
3 unnecessary duplication of efforts.

4 11. Sirmabekian Law Firm, PC has devoted an estimated approximately 271.8 hours
5 to this matter through this date.

6 12. Based on the time records maintained by my firm, attached hereto as “**EXHIBIT**
7 **1**” is a true and correct copy of the lodestar attributable to my firm.

8 13. My firm anticipates performing an additional number of hours of work in
9 connection with final approval, including preparation for and attendance at the final approval
10 hearing, communications concerning implementation of the Settlement, and post-approval
11 matters. This anticipated additional time is not included in the lodestar stated above.

12 14. My current hourly rate is \$600/hr. I have practiced law for approximately 15+
13 years, including substantial experience in class actions and employment litigation.

14 15. The hourly rates reflected above are my firm’s current rates. In my experience,
15 these rates are reasonable and consistent with rates charged by attorneys of comparable
16 experience, skill, and expertise handling class actions and complex litigation in California.

17 16. The hours set forth above were derived from contemporaneously maintained
18 billing records, time records maintained in the ordinary course. I have reviewed the time
19 attributable to my firm and believe the hours claimed are reasonable for the work performed and
20 the results obtained.

21 17. In exercising billing judgment, my firm has excluded or reduced time that was
22 duplicative, administrative, clerical, or otherwise inappropriate to include in the lodestar. The
23 lodestar stated above therefore reflects the time for which my firm seeks credit in connection
24 with the Court’s review of the requested fee award.

25 18. In my opinion, the requested fee is reasonable in light of the work performed, the
26 contingent nature of the representation, the risks assumed by Class Counsel, the result achieved
27 for the Class, and the delay in receiving compensation.

1 19. Sirmabekian Law Firm, PC has incurred \$6,484.52 in unreimbursed litigation
2 costs and expenses in prosecuting this action.

3 20. Attached hereto as “**EXHIBIT 2**” is a true and correct copy of an itemized list of
4 those incurred costs and expenses.

5 21. These costs and expenses were reasonably and necessarily incurred in the
6 prosecution and resolution of the action.

7 22. I have participated in the investigation, litigation, evaluation, and/or settlement of
8 this action and am familiar with the material facts, the claims asserted by Plaintiff, Defendant’s
9 defenses, and the risks facing the parties if the action were to proceed through further litigation,
10 class certification, summary judgment, trial, and potential appeal.

11 23. Before agreeing to the Settlement, Class Counsel investigated and evaluated the
12 claims through, among other things, review of policies, handbooks, payroll records, time records,
13 personnel records, sampling/data analysis, written discovery, depositions, informal exchange of
14 information, expert analysis, etc. This information provided counsel with a sufficient factual
15 basis to evaluate both the potential value of the claims and the risks of continued litigation.

16 24. In evaluating the Settlement, counsel considered the potential recovery on the
17 claims asserted in the action.

18 25. Counsel also considered substantial litigation risks, including, Defendant’s
19 contention that the challenged practice complied with applicable law; individualized issues
20 affecting certification; uncertainty regarding the availability or amount of penalties; evidentiary
21 difficulties; manageability concerns; potential decertification; and the possibility of an adverse
22 ruling at summary judgment, trial, or on appeal.

23 26. After considering the strengths and weaknesses of the claims and defenses and the
24 realistic range of possible outcomes, I believe the Settlement provides substantial and
25 meaningful relief to the Settlement Class.

26 27. The Settlement was reached only after arm’s-length negotiations, including a
27 private mediation on 09/18/2025, with mediator Jeffrey Fuchsman of Fuchsman Mediation, LLC,
28

1 an experienced mediator in class and employment matters. The negotiations were adversarial and
2 non-collusive.

3 28. In evaluating whether to recommend the Settlement, I considered not merely
4 Defendant's maximum potential exposure, but the probability of establishing liability and
5 obtaining and preserving class certification, the availability and amount of statutory penalties,
6 Defendant's defenses, the possibility of obtaining a substantially smaller recovery—or no
7 recovery—following further litigation, and the additional delay and expense associated with trial
8 and appellate proceedings.

9 29. Continued litigation would require the parties to incur substantial additional
10 attorneys' fees and costs and could delay any recovery to Settlement Class Members for years.
11 Even if Plaintiff ultimately prevailed, further litigation would present risks concerning
12 certification, liability, damages, penalties, and appeal, that could materially reduce or eliminate
13 the recovery.

14 30. In my professional judgment, informed by my experience litigating similar
15 matters and my involvement in this action, the Settlement falls well within the range of
16 reasonable outcomes. It provides a substantial present benefit to Settlement Class Members
17 while avoiding the expense, uncertainty, and delay inherent in continued class litigation.

18 31. I therefore believe that the Settlement is fair, reasonable, and adequate and is in
19 the best interests of the Settlement Class, and I respectfully recommend that the Court grant final
20 approval.

21 32. I further believe that the attorneys' fees and litigation costs requested by Class
22 Counsel are reasonable in light of the work performed, the risks undertaken, the contingent
23 nature of the representation, and the benefits achieved for the Settlement Class.

24 33. I am a graduate of La Verne Law School and I obtained my undergraduate degree
25 from UCLA. I have never been charged with attorney misconduct or subjected to any
26 disciplinary proceedings in any court in which I have practiced. I entered private practice of law
27 in 2011 in California.
28

1 34. I primarily handle employment law cases. A substantial portion of my firm's
2 current practice includes prosecution of wage and hour individual and class action cases. I
3 presently have over 80 active employment law cases in litigation. Few of those cases are wage
4 and hour class actions in which I am lead counsel or co-counsel, and nearly all of the remainder
5 are actions involving PAGA claims. The following are examples of some of my past and present
6 wage and hour class action cases:

7 a. *Quiroz Guerrero, Adrian v. Ruth's Chris Hospitality Group* (RIC1804127)

8 i. Riverside County Superior Court

9 ii. Status: Final Approval granted 03/12/2025.

10 b. *Barco, Juan v. Kelly Toy USA, Inc* (20STCV12539);

11 i. Los Angeles Superior Court

12 ii. Status: Final Approval granted 05/22/2024.

13 c. *Guerrero, Enrique v. Chef's Toys* (30-2018-00980488-CU-OE-CXC)

14 i. Orange County Superior Court

15 ii. Status: Final Approval granted 01/05/2024.

16 d. *Esquivel, Maria v. Holiday Inn Express & Suites* (BCV-21-100131);

17 i. Kern County Superior Court

18 ii. Status: Final Approval granted 10/10/2023.

19 e. *Saravia, Manuel Antonio v. South City Gas* (19STCV14499)

20 i. Los Angeles Superior Court

21 ii. Status: Final Approval granted 02/03/2022.

22 f. *Becerra, Osvaldo v. Contessa Premium Foods* (19STCV05920)

23 i. Los Angeles Superior Court

24 ii. Status: PAGA Settlement Approval granted 09/10/2021.

25 g. *Martinez, Humberto v. Lamwood Seating Products, Inc.* (BC688408)

26 i. Los Angeles Superior Court

27 ii. Status: Final Approval granted 01/27/2021.

28 h. *Mayca, Irma v. DHL eCommerce* (19STCV20237)

- 1 i. Los Angeles Superior Court
- 2 ii. Status: Final Approval granted 12/08/2020.
- 3 i. *Mendez, Guillermo v. Growith Inc. (56-2019-00530081-CU-OE-VTA)*
- 4 i. Ventura County Superior Court – Hall of Justice
- 5 ii. Status: case settled March 22, 2021; dismissed April 20, 2021;
- 6 j. *Moreira, Joao v. Mintz Concrete, Inc. (18STCV04959)*
- 7 i. Los Angeles Superior Court
- 8 ii. Status: Final Approval granted 12/15/2021.
- 9 k. *Ontiveros Chamu, Julio Cesar v. Tequila Jack's Inc. (24STCV22332)*
- 10 i. Los Angeles Superior Court
- 11 ii. Final Approval granted 08/28/2026.
- 12 l. *Gonzalez, Cesar v. Painted Rhino, Inc., et al. (RIC1808671)*
- 13 i. Riverside Superior Court
- 14 ii. Status: Final Approval granted 09/01/2020.
- 15 m. *Salazar, Ruben v. Amrep, Inc. (19STCV00602)*
- 16 i. Los Angeles Superior Court
- 17 ii. Status: substituted out;
- 18 n. *Salgado, Luis v. Mckenna Labs, Inc.(30-2019-01048225-CU-OE-CXC)*
- 19 i. Orange County Superior Court
- 20 ii. Status: Final Approval granted 05/26/2021.
- 21 o. *Soto Cardenas, Joel v. Century West Plumbing (19STCV25672)*
- 22 i. Los Angeles Superior Court
- 23 ii. Status: Final Approval Granted 08/23/2021.
- 24 p. *Chavez Hidalgo, Franz v. Orozco's Auto Service, Inc., et al. (22STCV21211)*
- 25 i. Los Angeles Superior Court
- 26 ii. Status: Final Approval granted 01/22/2024.
- 27 q. *Berduo Lopez, Victor v. Demejico, Inc. (21STCV47543)*
- 28 i. Los Angeles Superior Court

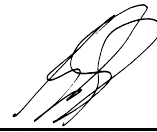
ii. Status: Final Approval Granted 06/14/2024.

r. *Mendoza Vargas, Cecilia v. Aero Engineering & Manufacturing
Company of California, et al. (23STCV25755)*

i. Los Angeles Superior Court

ii. Status: Final Approval granted 10/08/2025.

I declare under penalty of perjury of the laws of the State of California that the foregoing
is true and correct. Executed on September 18, 2026, at Burbank, California.



SARKIS SIRMABEKIAN

EXHIBIT 1

Date	Description	Time
7/20/2023	meeting/discussion with client	3
7/20/2023	internal correspondence	0.2
7/20/2023	drafted personnel file request	0.8
7/21/2023	internal correspondence	0.1
7/24/2023	client correspondence	0.2
7/24/2023	internal correspondence	0.1
7/25/2023	firm meeting re case facts / plan of action	2
8/7/2023	reviewed client documents	1
8/7/2023	client call	1.6
8/8/2023	drafted paga notice letter	5.2
8/8/2023	internal correspondence	0.1
8/9/2023	updated firm calendar	0.2
8/9/2023	firm meeting	2
8/9/2023	internal correspondence	0.1
8/12/2023	organize physical file	1.5
9/29/2023	client correspondence	0.2
9/29/2023	internal correspondence	0.1
9/29/2023	firm meeting	0.5
9/30/2023	client call	0.7
10/10/2023	internal correspondence	0.1
10/10/2023	call with potential class member	1
10/15/2023	began preparing class action lawsuit	4.4
10/15/2023	reviewed client file	0.3
10/16/2023	revised complaint	2.8
10/17/2023	finalized complaint filing papers	3.3
10/18/2023	internal correspondence	0.1
10/18/2023	firm meeting	1
10/19/2023	internal correspondence	0.1
10/19/2023	client call	1
10/24/2023	call with messenger service	0.5
10/24/2023	internal correspondence	0.1
10/24/2023	updated firm calendar	0.2
10/25/2023	call with defense counsel	0.2
10/25/2023	firm meeting	0.5
10/26/2023	internal correspondence	0.1
10/29/2023	correspondence with messenger service	0.1
10/30/2023	call with messenger service	0.4
10/30/2023	internal correspondence	0.1
10/31/2023	internal correspondence	0.1
11/1/2023	updated firm calendar	0.2

11/1/2023	internal correspondence	0.1
11/3/2023	internal correspondence	0.1
11/3/2023	reviewed client file	0.5
11/15/2023	client call	2
11/15/2023	internal correspondence	0.1
11/22/2023	firm meeting	1.3
11/27/2023	processed minute order	0.4
11/27/2023	internal correspondence	0.1
11/27/2023	updated firm calendar	0.2
11/27/2023	correspondence with defense counsel	0.1
11/27/2023	reviewed defendants answer	1
12/5/2023	correspondence with defense counsel	0.1
12/5/2023	internal correspondence	0.1
12/5/2023	reviewed client file	0.4
12/11/2023	firm meeting	0.8
12/11/2023	correspondence with defense counsel	0.1
12/12/2023	call with defense counsel	0.3
12/13/2023	client call	0.6
12/13/2023	internal correspondence	0.1
12/13/2023	reviewed Sanchez Complaint	2
12/13/2023	correspondence with defense counsel	0.1
12/14/2023	internal correspondence	0.1
12/14/2023	correspondence with co-counsel	0.1
12/15/2023	reviewed Broker-Carrier Agreement	0.3
12/15/2023	correspondence with defense counsel	0.1
12/16/2023	correspondence with co-counsel	0.1
12/18/2023	correspondence with co-counsel	0.1
12/18/2023	correspondence with defense counsel	0.1
12/19/2023	firm meeting	2
12/19/2023	call with co-counsel	0.5
12/19/2023	internal correspondence	0.1
12/21/2023	correspondence with defense counsel	0.1
12/22/2023	correspondence with defense counsel	0.1
12/27/2023	correspondence with defense counsel	0.1
12/28/2023	correspondence with defense counsel	0.1
1/9/2024	call with defense counsel	0.4
1/9/2024	correspondence with legal services company	0.1
1/9/2024	internal correspondence	0.1
1/10/2024	internal correspondence	0.1
1/10/2024	reviewed client file	0.5

1/12/2024	internal correspondence	0.1
1/15/2024	firm meeting	0.8
1/16/2024	correspondence with legal services company	0.1
1/16/2024	internal correspondence	0.1
1/18/2024	internal correspondence	0.1
1/18/2024	client call	1.6
1/20/2024	internal correspondence	0.1
1/19/2024	prepared discovery requests	5
1/20/2024	finalized and served discovery requests	1.2
1/20/2024	correspondence with defense counsel	0.1
2/8/2024	correspondence with defense counsel	0.1
2/8/2024	firm meeting	0.8
2/21/2024	correspondence with defense counsel	0.1
2/21/2024	reviewed joint statement	1.3
2/21/2024	internal correspondence	0.1
2/22/2024	internal correspondence	0.1
2/22/2024	firm meeting	0.5
2/22/2024	correspondence with defense counsel	0.1
2/23/2024	client call	1
2/23/2024	processed minute order	0.4
2/23/2024	updated firm calendar	0.2
3/20/2024	correspondence with client	0.1
3/20/2024	firm meeting	0.5
3/20/2024	reviewed client file	0.8
3/22/2024	correspondence with defense counsel	0.1
3/22/2024	internal correspondence	0.1
3/25/2024	internal correspondence	0.1
3/25/2024	client call	1
3/27/2024	call with defense counsel	0.5
3/27/2024	firm meeting	0.6
4/19/2024	correspondence with defense counsel	0.1
4/19/2024	reviewed discovery responses	3.7
4/19/2024	internal correspondence	0.1
4/20/2024	firm meeting	2
4/20/2024	correspondences with defense counsel	0.2
4/22/2024	internal correspondence	0.1
4/22/2024	client call	3
4/22/2024	updated firm calendar	0.2
4/24/2024	correspondence with all counsel	0.1
4/24/2024	reviewed draft stipulation	0.8

4/24/2024	correspondence with Sanchez counsel	0.1
4/24/2024	reviewed draft joint prosecution agreement	1
4/25/2024	internal correspondence	0.1
4/25/2024	correspondence with Sanchez counsel	0.1
4/25/2024	redlined draft stipulation	0.4
4/26/2024	client call	1
4/29/2024	correspondence with Sanchez counsel	0.1
5/7/2024	correspondence with all counsel	0.1
5/8/2024	correspondence with all counsel	0.1
5/9/2024	correspondence with all counsel	0.1
5/13/2024	internal correspondence	0.1
5/13/2024	correspondence with all counsel	0.1
5/13/2024	correspondence with Sanchez counsel	0.1
5/15/2024	firm meeting	0.8
5/15/2024	correspondence with defense counsel	0.1
5/15/2024	prepared dismissal papers for OC	2
5/15/2024	correspondence with Sanchez counsel	0.1
5/16/2024	client call	1
5/16/2024	correspondence with defense counsel	0.1
5/16/2024	correspondence with Sanchez counsel	0.1
5/16/2024	reviewed joint statement	0.6
5/16/2024	internal correspondence	0.1
5/18/2024	correspondence with Sanchez counsel	0.1
5/20/2024	correspondence with Sanchez counsel	0.1
5/22/2024	prepared for cmc hearing	0.8
5/22/2024	correspondence with Sanchez counsel	0.1
5/23/2024	attended cmc hearing	1
5/23/2024	firm meeting	1.2
5/24/2024	internal correspondence	0.1
5/24/2024	client call	0.5
5/28/2024	correspondence with defense counsel	0.1
5/28/2024	reviewed stipulation to dismiss	0.8
5/28/2024	reviewed client file	0.2
5/29/2024	correspondence with defense counsel	0.1
5/29/2024	client call	0.5
5/30/2024	firm meeting	0.8
6/3/2024	internal correspondence	0.1
6/5/2024	correspondence with all counsel	0.1
6/5/2024	internal correspondence	0.1
6/6/2024	prepared paga complaint in Ala. County	4

6/10/2024	correspondence with all counsel	0.1
6/10/2024	client call	1
6/12/2024	correspondence with all counsel	0.1
6/12/2024	updated firm calendar	0.2
6/13/2024	correspondence with Sanchez counsel	0.1
6/14/2024	correspondence with dept. 16	0.1
6/14/2024	correspondence with Sanchez counsel	0.1
6/14/2024	processed notice of case reassignment	0.4
6/14/2024	processed notice of hearing	0.4
6/14/2024	updated firm calendar	0.2
6/14/2024	reviewed belaire-west notice	2.8
6/15/2024	client call	1.5
6/17/2024	correspondence with Sanchez counsel	0.1
6/17/2024	internal correspondence	0.1
6/17/2024	prepared notice & ack. of receipt	1.3
6/28/2024	firm meeting	2
7/3/2024	correspondence with Sanchez counsel	0.1
7/4/2024	correspondence with Sanchez counsel	0.1
7/4/2024	reviewed stip and notice re belaire	0.5
7/8/2024	correspondence with Sanchez counsel	0.1
7/8/2024	correspondence with all counsel	0.1
7/8/2024	reviewed draft belaire and stipulation	1
7/8/2024	reviewed executed notice & ack of receipt	0.2
7/8/2024	updated firm calendar	0.2
7/11/2024	client call	0.5
7/11/2024	correspondence with all counsel	0.1
7/18/2024	correspondence with all counsel	0.1
7/19/2024	updated firm calendar	0.2
7/19/2024	correspondence with all counsel	0.1
7/21/2024	correspondence with all counsel	0.1
7/22/2024	firm meeting	0.6
7/22/2024	correspondence with defense counsel	0.1
7/22/2024	correspondence with all counsel	0.1
8/1/2024	client call	0.8
8/1/2024	correspondence with all counsel	0.1
8/7/2024	reviewed defendants answer	0.4
8/7/2024	internal correspondence	0.1
8/7/2024	correspondence with defense counsel	0.1
8/13/2024	correspondence with all counsel	0.1
8/14/2024	internal correspondence	0.1
8/15/2024	internal correspondence	0.1

8/15/2024	client call	0.5
8/16/2024	client correspondence	0.1
8/16/2024	correspondence with all counsel	0.1
8/16/2024	client call	0.2
8/16/2024	internal correspondence	0.1
8/21/2024	client correspondence	0.1
8/21/2024	internal correspondence	0.1
8/21/2024	correspondence with Sanchez counsel	0.1
8/22/2024	correspondence with Sanchez counsel	0.1
8/23/2024	firm meeting	1
8/25/2024	finalized and served discovery requests	2.8
8/25/2024	correspondence with Sanchez counsel	0.1
8/25/2024	correspondence with all counsel	0.1
8/25/2024	internal correspondence	0.1
8/26/2024	internal correspondence	0.1
8/29/2024	internal correspondence	0.1
8/29/2024	updated firm calendar	0.2
8/30/2024	internal correspondence	0.1
9/1/2024	correspondence with defense counsel	0.1
9/2/2024	client call	0.5
9/3/2024	firm meeting	0.8
9/3/2024	internal correspondence	0.1
9/3/2024	client correspondence	0.1
9/4/2024	correspondence with all counsel	0.1
9/5/2024	correspondence with Sanchez counsel	0.1
9/6/2024	correspondence with all counsel	0.1
9/10/2024	firm meeting	0.5
9/13/2024	internal correspondence	0.1
9/13/2024	correspondence with all counsel	0.1
9/16/2024	correspondence with defense counsel	0.1
9/17/2024	correspondence with defense counsel	0.1
9/18/2024	firm meeting	0.5
9/25/2024	internal correspondence	0.1
9/26/2024	correspondence with defense counsel	0.1
9/26/2024	reviewed defendant's M&C letter	2.5
9/26/2024	internal correspondence	0.1
9/27/2024	reviewed defendant's discovery responses	2.2
9/27/2024	internal correspondence	0.1
9/29/2024	updated firm calendar	0.2
9/29/2024	firm meeting	0.8
9/29/2024	client call	1

9/30/2024	correspondence with defense counsel	0.1
9/30/2024	reviewed draft stipulation	0.6
10/1/2024	client call	1
10/1/2024	redlined draft stipulation	0.8
10/2/2024	correspondence with defense counsel	0.1
10/2/2024	prepared amended paga notice	4.6
10/2/2024	internal correspondence	0.1
10/3/2024	internal correspondence	0.1
10/3/2024	correspondence with defense counsel	0.1
10/5/2024	correspondence with defense counsel	0.1
10/7/2024	correspondence with defense counsel	0.1
10/8/2024	correspondence with all counsel	0.1
10/10/2024	correspondence with defense counsel	0.1
10/16/2024	client call	0.5
10/16/2024	internal correspondence	0.1
10/17/2024	correspondence with all counsel	0.1
10/17/2024	updated firm calendar	0.2
10/25/2024	correspondence with all counsel	0.1
10/25/2024	reviewed case management order	0.5
10/25/2024	updated firm calendar	0.2
10/27/2024	prepared notice of change of address	0.8
10/27/2024	prepared cmc statement	1.5
10/22/2024	reviewed draft belaire notice	0.8
10/22/2024	correspondence with all counsel	0.1
10/24/2024	correspondence with all counsel	0.1
10/24/2024	client call	0.4
10/25/2024	correspondence with defense counsel	0.1
10/27/2024	correspondence with defense counsel	0.1
10/28/2024	correspondence with defense counsel	0.1
10/28/2024	reviewed defendant's cmc statement	0.5
10/28/2024	internal correspondence	0.1
10/29/2024	internal correspondence	0.1
10/30/2024	correspondence with all counsel	0.1
10/30/2024	review court's order re belaire and notice	0.5
10/30/2024	correspondence with settlement admin	0.1
10/30/2024	firm meeting	0.6
10/31/2024	correspondence with Sanchez counsel	0.1
10/31/2024	correspondence with defense counsel	0.1
11/3/2024	correspondence with defense counsel	0.1
11/4/2024	correspondence with all counsel	0.1
11/4/2024	internal correspondence	0.1

11/4/2024	firm meeting	0.5
11/5/2024	correspondence with all counsel	0.1
11/11/2024	prepared for cmc hearing	0.8
11/12/2024	correspondence with dept. 16	0.1
11/12/2024	reviewed court's order	0.5
11/12/2024	internal correspondence	0.1
11/12/2024	client call	1
11/12/2024	correspondence with defense counsel	0.1
11/12/2024	correspondence with Sanchez counsel	0.1
11/12/2024	appeared at cmc hearing	1
11/13/2024	internal correspondence	0.1
11/13/2024	firm meeting	0.5
11/13/2024	updated firm calendar	0.2
11/13/2024	correspondence with defense counsel	0.1
11/13/2024	client call	0.5
11/13/2024	correspondence with Sanchez counsel	0.1
11/14/2024	correspondence with defense counsel	0.1
11/14/2024	correspondence with Sanchez counsel	0.1
11/15/2024	client call	0.2
11/15/2024	correspondence with defense counsel	0.1
11/21/2024	internal correspondence	0.1
11/22/2024	correspondence with defense counsel	0.1
11/27/2024	correspondence with all counsel	0.1
11/30/2024	correspondence with defense counsel	0.1
12/5/2024	internal correspondence	0.1
12/5/2024	correspondence with defense counsel	0.1
12/6/2024	firm meeting	0.5
12/6/2024	correspondence with defense counsel	0.1
12/8/2024	correspondence with defense counsel	0.1
12/8/2024	client call	0.5
12/11/2024	correspondence with defense counsel	0.1
12/14/2024	correspondence with defense counsel	0.1
12/14/2024	client call	0.8
12/18/2024	correspondence with defense counsel	0.1
12/19/2024	correspondence with defense counsel	0.1
12/23/2024	correspondence with defense counsel	0.1
12/23/2024	internal correspondence	0.1
12/23/2024	reviewed and organized client file	1
12/24/2024	correspondence with defense counsel	0.1
12/30/2024	correspondence with defense counsel	0.1
12/30/2024	updated firm calendar	0.2

1/2/2025	internal correspondence	0.1
1/2/2025	correspondence with Sanchez counsel	0.1
1/7/2025	prepared mediation disclosures	1.8
1/7/2025	client call	1
1/8/2025	internal correspondence	0.1
1/8/2025	client correspondence	0.1
1/8/2025	correspondence with Sanchez counsel	0.1
1/8/2025	firm meeting	1
1/10/2025	client call	0.5
1/13/2025	correspondence with defense counsel	0.1
1/14/2025	correspondence with dept. 16	0.1
1/14/2025	reviewed court's order	0.3
1/14/2025	correspondence with defense counsel	0.1
1/14/2025	correspondence with all counsel	0.1
1/15/2025	internal correspondence	0.1
1/16/2025	correspondence with all counsel	0.1
1/19/2025	firm meeting	1
1/19/2025	updated firm calendar	0.2
1/19/2025	correspondence with defense counsel	0.1
1/22/2025	correspondence with defense counsel	0.1
1/22/2025	internal correspondence	0.1
1/23/2025	correspondence with defense counsel	0.1
1/23/2025	client call	0.5
1/26/2025	correspondence with defense counsel	0.1
1/30/2025	correspondence with Sanchez counsel	0.1
1/30/2025	firm meeting	0.5
2/1/2025	correspondence with defense counsel	0.1
2/3/2025	correspondence with Sanchez counsel	0.1
2/3/2025	firm meeting	0.5
2/3/2025	correspondence with defense counsel	0.1
2/4/2025	correspondence with Sanchez counsel	0.1
2/5/2025	updated firm calendar	0.2
2/5/2025	reviewed and organized client file	0.8
2/5/2025	correspondence with defense counsel	0.1
2/5/2025	correspondence with Sanchez counsel	0.1
2/5/2025	correspondence with all counsel	0.1
2/7/2025	reviewed draft stipulation	0.8
2/7/2025	internal correspondence	0.1
2/7/2025	correspondence with Sanchez counsel	0.1
2/7/2025	correspondence with all counsel	0.1
2/11/2025	correspondence with defense counsel	0.1

2/11/2025	reviewed stipulation re belaire	0.4
2/18/2025	correspondence with defense counsel	0.1
2/18/2025	reviewed defendant's Answer	0.6
2/24/2025	client call	0.5
2/24/2025	correspondence with all counsel	0.1
2/26/2025	firm meeting	0.8
2/28/2025	correspondence with all counsel	0.1
3/5/2025	internal correspondence	0.1
3/5/2025	client call	0.5
3/16/2025	internal correspondence	0.1
3/20/2025	correspondence with defense counsel	0.1
3/21/2025	correspondence with all counsel	0.1
3/21/2025	reviewed stipulation	0.8
3/25/2025	correspondence with Sanchez counsel	0.1
3/25/2025	updated firm calendar	0.2
3/31/2025	correspondence with defense counsel	0.1
3/31/2025	correspondence with Sanchez counsel	0.1
4/1/2025	internal correspondence	0.1
4/1/2025	client call	1
4/1/2025	correspondence with Sanchez counsel	0.1
4/2/2025	firm meeting	0.5
4/2/2025	correspondence with all counsel	0.1
4/4/2025	client correspondence	0.1
4/4/2025	correspondence with all counsel	0.1
4/7/2025	internal correspondence	0.1
4/10/2025	firm meeting	0.5
4/15/2025	client call	0.4
4/15/2025	correspondence with Sanchez counsel	0.1
4/18/2025	correspondence with Sanchez counsel	0.1
4/21/2025	correspondence with Sanchez counsel	0.1
4/21/2025	reviewed stipulation	1.2
4/22/2025	internal correspondence	0.1
5/11/2025	firm meeting	0.5
6/11/2025	correspondence with Sanchez counsel	0.1
6/11/2025	updated firm calendar	0.2
6/16/2025	correspondence with dept. 16	0.1
6/16/2025	reviewed court's order	0.5
6/16/2025	correspondence with Sanchez counsel	0.1
6/17/2025	client correspondence	0.1
6/21/2025	client correspondence	0.1
6/23/2025	firm meeting	1

6/23/2025	internal correspondence	0.1
8/1/2025	correspondence with Sanchez counsel	0.1
8/4/2025	correspondence with Sanchez counsel	0.1
8/6/2025	correspondence with Sanchez counsel	0.1
8/6/2025	firm meeting	2
8/6/2025	internal correspondence	0.1
7/18/2025	reviewed and organized client file	0.4
7/22/2025	updated firm calendar	0.2
8/11/2025	call with Sanchez counsel	1
8/12/2025	internal correspondence	0.1
8/13/2025	client call	1.5
8/18/2025	correspondence with Sanchez counsel	0.1
8/18/2025	reviewed draft jpa	0.5
8/19/2025	correspondence with Sanchez counsel	0.1
8/20/2025	client call	2
8/25/2025	internal correspondence	0.1
8/25/2025	correspondence with Sanchez counsel	0.1
8/26/2025	correspondence with Sanchez counsel	0.1
8/27/2025	correspondence with Sanchez counsel	0.1
8/27/2025	updated firm calendar	0.2
8/28/2025	correspondence with Sanchez counsel	0.1
9/10/2025	correspondence with Sanchez counsel	0.1
9/10/2025	reviewed mediation data	3.5
9/11/2025	correspondence with Sanchez counsel	0.1
9/11/2025	reviewed mediation data	2.8
9/12/2025	firm meeting	1
9/12/2025	correspondence with Sanchez counsel	0.1
9/12/2025	reviewed mediation data	1.5
9/14/2025	reviewed mediation data	2.3
9/15/2025	client call	2
9/15/2025	correspondence with Sanchez counsel	0.1
9/16/2025	reviewed mediation brief	3
9/16/2025	prepared for mediation	2.5
9/17/2025	prepared for mediation	4.8
9/17/2025	client call	1
9/17/2025	firm meeting	0.5
9/18/2025	attended mediation	8
9/19/2025	client call	0.5
9/19/2025	updated firm calendar	0.2
9/24/2025	correspondence with Sanchez counsel	0.1
9/24/2025	reviewed notice of settlement	0.4

9/24/2025	reviewed notice of entry of order	0.3
9/24/2025	firm meeting	0.5
9/30/2025	correspondence with Sanchez counsel	0.1
9/30/2025	reviewed settlement admin documents	0.3
10/23/2025	correspondence with Sanchez counsel	0.1
10/23/2025	firm meeting	0.5
11/4/2025	internal correspondence	0.1
11/4/2025	client correspondence	0.1
11/5/2026	firm meeting	0.5
11/11/2025	correspondence with Sanchez counsel	0.1
11/11/2025	client call	0.5
11/11/2025	reviewed draft settlement agreement	3.8
11/14/2025	correspondence with Sanchez counsel	0.1
11/14/2025	reviewed joint statement	0.5
11/14/2025	client call	0.2
11/17/2025	correspondence with Sanchez counsel	0.1
11/20/2025	correspondence with Sanchez counsel	0.1
11/20/2025	reviewed redlines re settlement agreement	2.2
11/21/2025	correspondence with dept. 16	0.1
11/21/2025	reviewed court's order	0.2
11/21/2025	internal correspondence	0.1
11/21/2025	correspondence with defense counsel	0.1
11/21/2025	correspondence with Sanchez counsel	0.1
11/24/2025	updated firm calendar	0.2
11/24/2025	firm meeting	0.8
11/24/2025	correspondence with dept. 16	0.1
11/24/2025	reviewed draft amended complaint	1.3
12/2/2025	correspondence with Sanchez counsel	0.1
12/2/2025	client call	0.5
12/11/2025	correspondence with Sanchez counsel	0.1
12/11/2025	reviewed redlines re settlement agreement	0.4
12/12/2025	correspondence with Sanchez counsel	0.1
12/15/2025	correspondence with Sanchez counsel	0.1
12/18/2025	correspondence with Sanchez counsel	0.1
12/18/2025	reviewed draft class notice documents	3.7
12/22/2025	firm meeting	0.5
12/22/2025	client call	0.2
1/9/2026	correspondence with Sanchez counsel	0.1
1/9/2026	reviewed redlines re class notice	0.5
1/12/2026	correspondence with Sanchez counsel	0.1
1/15/2026	client call	0.8

1/15/2026	correspondence with Sanchez counsel	0.1
1/15/2026	correspondence with defense counsel	0.1
1/15/2026	internal correspondence	0.1
1/16/2026	client call	1.2
1/16/2026	correspondence with Sanchez counsel	0.1
1/16/2026	correspondence with defense counsel	0.1
1/27/2026	correspondence with defense counsel	0.1
1/27/2026	reviewed motion preliminary approval papers	2.2
1/30/2026	internal correspondence	0.1
1/30/2026	client correspondence	0.1
1/30/2026	firm meeting	0.5
2/2/2026	correspondence with Sanchez counsel	0.1
2/2/2026	reviewed fully executed SA	0.4
2/5/2026	correspondence with defense counsel	0.1
2/5/2026	correspondence with Sanchez counsel	0.1
2/6/2026	client correspondence	0.1
2/18/2026	correspondence with defense counsel	0.1
2/20/2026	correspondence with defense counsel	0.1
2/24/2026	correspondence with Sanchez counsel	0.1
3/4/2026	prepared Sirmabekian decl iso mpa	1.8
3/4/2026	firm meeting	0.5
3/4/2026	internal correspondence	0.1
3/6/2026	correspondence with Sanchez counsel	0.1
3/6/2026	correspondence with defense counsel	0.1
3/6/2026	reviewed stipulation	0.6
3/9/2026	correspondence with defense counsel	0.1
3/17/2026	correspondence with Sanchez counsel	0.1
3/17/2026	reviewed first amended complaint	0.8
3/26/2026	internal correspondence	0.1
3/26/2026	client correspondence	0.1
4/10/2026	firm meeting	0.5
4/13/2026	correspondence with Sanchez counsel	0.1
4/13/2026	reviewed court's tentative ruling	0.2
4/13/2026	correspondence with all counsel	0.1
4/14/2026	correspondence with Sanchez counsel	0.1
4/15/2026	correspondence with defense counsel	0.1
4/21/2026	correspondence with defense counsel	0.1
4/29/2026	correspondence with defense counsel	0.1
4/29/2026	reviewed Spanish copy of class notice	0.2
5/6/2026	correspondence with defense counsel	0.1

5/13/2026	correspondence with defense counsel	0.1
5/26/2026	correspondence with defense counsel	0.1
5/26/2026	reviewed court's order granting mpa	0.2
5/28/2026	prepared for cmc hearing	0.3
5/29/2026	correspondence with defense counsel	0.1
5/29/2026	attended cmc hearing	1
5/29/2026	firm meeting	0.5
6/5/2026	correspondence with defense counsel	0.1
6/5/2026	reviewed first addendum	0.3
6/5/2026	client correspondence	0.1
6/5/2026	internal correspondence	0.1
6/5/2026	reviewed stipulation re first addendum	0.6
6/6/2026	correspondence with defense counsel	0.1
6/8/2026	firm meeting	0.5
6/8/2026	correspondence with defense counsel	0.1
6/11/2026	client call	0.4
6/11/2026	correspondence with defense counsel	0.1
6/11/2026	internal correspondence	0.1
6/11/2026	reviewed court's order and minute order	0.2
6/11/2026	correspondence with all counsel	0.1
6/11/2026	correspondence with Sanchez counsel	0.1
6/12/2026	firm meeting	0.5
6/16/2026	prepared notice of settlement	0.8
6/16/2026	correspondence with all counsel	0.1
6/17/2026	internal correspondence	0.1
6/23/2026	correspondence with dept. 16	0.1
6/23/2026	reviewed court's notice of hearing	0.2
8/31/2026	correspondence with Sanchez counsel	0.1
9/3/2026	call with client	0.5
9/4/2026	firm meeting	1
9/14/2026	drafted client declarations	2.3
9/15/2026	client call	0.5
9/15/2026	drafted Sirmabekian declaration	1.8
9/16/2026	prepared lodestar timesheet	3
9/17/2026	correspondence with Sanchez counsel	0.1
9/18/2026	finalized Sirmabekian declaration	1.2
9/18/2026	client correspondence	0.1
9/18/2026	internal correspondence	0.1
	TOTAL HOURS:	271.8

EXHIBIT 2

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Delivery services/messengers DDS Order ID# 810617-01	BILLABLE	6/16/2026	\$20.95	\$20.95	1	Liliana Ruiz
Courtfees court's download fee - 05/29 Order and Minute Order documents	BILLABLE	6/11/2026	\$5.00	\$5.00	1	Gregg Sirmabekhian
Delivery services/messengers DDS Order ID# 654691-01	BILLABLE	4/23/2025	\$80.75	\$80.75	1	Liliana Ruiz
Arbitrators/mediators Fuchsman Mediation (Paid 8/25/25 Wire)	BILLABLE	2/4/2025	\$4,000.00	\$4,000.00	1	Sarkis Sirmabekhian
Delivery services/messengers DDS Order ID# 619119-01	BILLABLE	1/20/2025	\$18.95	\$18.95	1	Liliana Ruiz
Delivery services/messengers DDS Order ID# 614430-01	BILLABLE	1/7/2025	\$39.55	\$39.55	1	Liliana Ruiz
Courtfees Court's download fee - 11/12/2024 Minute Order and Case Management Order documents	BILLABLE	11/13/2024	\$8.00	\$8.00	1	Gregg Sirmabekhian
Delivery services/messengers DDS Order ID#592629-01	BILLABLE	10/29/2024	\$18.95	\$18.95	1	Liliana Ruiz
Delivery services/messengers DDS Order ID# 539910-01	BILLABLE	6/6/2024	\$465.45	\$465.45	1	Liliana Ruiz

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Delivery services/messengers DDS Order ID# 536887-01	BILLABLE	5/29/2024	\$52.80	\$52.80	1	Liliana Ruiz
Delivery services/messengers DDS Order ID# 532347-01	BILLABLE	5/15/2024	\$29.95	\$29.95	1	Liliana Ruiz
Delivery services/messengers Turbo Messenger Invoice # 3219	BILLABLE	10/25/2023	\$75.00	\$75.00	1	Liliana Ruiz
Delivery services/messengers Turbo Messenger Invoice # 3219	BILLABLE	10/25/2023	\$45.00	\$45.00	1	Liliana Ruiz
Delivery services/messengers DDS Order 459912-01	BILLABLE	10/18/2023	\$1,510.25	\$1,510.25	1	Liliana Ruiz
Postage PAGA Ntc. via Certified and Return Slips.	BILLABLE	8/9/2023	\$9.73	\$19.46	2	Liliana Ruiz
Courtfees PAGA Filing Fee	BILLABLE	8/8/2023	\$75.00	\$75.00	1	Gregg Sirmabekhian
Postage PFR via Certified and Return Slips.	BILLABLE	7/20/2023	\$9.73	\$19.46	2	Liliana Ruiz
				\$6,484.52 USD		