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SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF PLACER

CARMEN GARCIA, individually and on
behalf of the State of California, as a private
attorney general, CHANCE MACAIRE and
ARTURO SARMIENTO III, on behalf of
the State of California, as private attorneys
general,

Plaintiffs,

vs.

CALIBER HOLDINGS OF CALIFORNIA,
LLC; CALIBER HOLDINGS, LLC.;
CALIBER HOLDINGS CORPORATION;
PHILLIP TARIN, an individual; and Does
1 through 20, inclusive,

Defendants.

Case No. S-CV-0050365

**DECLARATION OF TIMOTHY B. DEL
CASTILLO IN SUPPORT OF MOTION
TO APPROVE PRIVATE ATTORNEYS
GENERAL ACT SETTLEMENT**

Date: December 10, 2024

Time: 8:30 a.m.

Dept.: 42

Complaint Filed: April 24, 2023

FAC Filed: October 9, 2024

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP

Norman B. Blumenthal (State Bar #068687)

Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

Nicholas J. De Blouw (State Bar #280922)

2255 Calle Clara

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Attorneys for Plaintiffs

1 I, Timothy B. Del Castillo, declare:

2 1. I am an attorney at law duly admitted to practice before all the courts of the State of
3 California and an attorney of record for Plaintiff Carmen Garcia ("Plaintiff Garcia") in this matter.
4 I have personal knowledge of the facts set forth in this declaration, and if called as a witness, could
5 and would testify as to their accuracy.

6 2. I am making this declaration on behalf of my client, and in support of Plaintiffs'
7 Motion to Approve the parties' Private Attorneys General Act Settlement. A true and correct copy
8 of the parties' Joint Stipulation of PAGA Settlement and Release is being filed with this Motion as
9 **Exhibit 1.**

10 3. This case was brought as an individual and Private Attorneys General Act lawsuit
11 based on Plaintiff Garcia's contention that Defendants CALIBER HOLDINGS OF CALIFORNIA,
12 LLC, CALIBER HOLDINGS, LLC., and CALIBER HOLDINGS CORPORATION,
13 ("Defendants") committed the following violations: (1) Unlawful Discrimination on the Basis of
14 Sex; (2) Unlawful Discrimination on the Basis of Associational Disability; (3) Work Environment
15 Harassment; (4) Failure to Engage in the Interactive Process; (5) Failure to Provide a Reasonable
16 Accommodation; (6) Retaliation in Violation of the FEHA; (7) Failure to Prevent Harassment,
17 Discrimination and Retaliation; (8) Wrongful Termination in Violation of Public Policy; (9) Failure
18 to Pay Minimum Wage; (10) Failure to pay Overtime Wages; (11) Failure to Provide Meal Periods;
19 (12) Failure to Provide Rest Periods; (13) Failure to Reimburse Business Expenses; (14) Violation
20 of the Healthy Workplaces, Healthy Families Act; (15) Waiting Time Penalties; (16) Failure to
21 Provide Compliant Wage Statements; (17) Failure to Provide Payroll Records Upon Request; (18)
22 Violation of California Unfair Competition Law; and (19) Civil Penalties Pursuant to Private
23 Attorney General Act, Labor Code § 2698 et seq.

24 4. Plaintiffs Carmen Garcia, Chance Macaire, and Arturo Sarmiento III are the only
25 named Plaintiffs in this matter and worked during the time that Defendants' policies and practices
26 at issue in the operative Complaint were in effect. From Plaintiffs' counsel's initial investigations of
27 Plaintiffs' claims and documents, we believed these claims had merit and could be maintained as a
28 PAGA action.

1 5. From the beginning, Defendants contested the merits of this case, the manageability
2 of the case at trial, the extent of the damages that could be claimed given the existence of potential
3 individualized issues amongst similarly situated employees, and Plaintiffs' ability to prove a
4 violation in each pay period for each employee, among other defenses and contentions they made
5 challenging the propriety of this action and any liability for Plaintiffs claimed. Defendant further
6 contended that, even assuming there was a finding supporting the imposition of PAGA penalties,
7 the Court would likely exercise its discretion to substantially reduce any such penalties owed based
8 on the technical and/or individualized nature of any alleged violations rather than a true substantive
9 loss of wages suffered by the employees. Notwithstanding the agreement to settle this matter,
10 Defendants believe they have complied with all state and federal employment laws with respect to
11 Plaintiffs and similarly situated employees falling within the scope of the PAGA claims.

12 6. On April 14, 2023, Plaintiff Garcia gave written notice to the LWDA and Defendant
13 providing facts and the legal basis for claims that are being resolved under the proposed PAGA
14 settlement. Plaintiff Garcia also submitted the \$75.00 filing fee. The PAGA Notice was sent to
15 Defendants via certified mail. The LWDA did not provide any response to Plaintiff's notice
16 correspondence and Defendants did not cure any other alleged violations, authorizing Plaintiff
17 Garcia to seek PAGA penalties in this Court. On April 24, 2023, Plaintiff Garcia filed a lawsuit that
18 encompassed all claims alleged in the notice ("Garcia Action"). Attached hereto as **Exhibit A** is a
19 true and correct copy of the Plaintiff's April 14, 2023, LWDA Notice.

20 7. On March 3, 2023, Plaintiff Chance Macaire filed his written notice with the LWDA
21 providing facts and the legal basis for his claims and sent to Defendants via certified mail. On
22 August 7, 2023, Plaintiff Macaire filed an amended PAGA notice with the LWDA and sent to
23 Defendants via certified mail. The LWDA did not provide any response to Mr. Macaire's notice
24 correspondence and Defendants did not cure any other alleged violations, authorizing him to seek
25 PAGA penalties in Court. On October 13, 2023, Plaintiff Macaire filed his representative action in
26 the Superior Court of California as for the County of Los Angeles, Case No. 23STCV25051
27 ("Macaire Action").
28

1 8. My office has been actively engaged in litigating this matter, working closely with
2 our co-counsel, Blumenthal Nordrehaug Bhowmik De Blouw LLP (“BAM Law”) on behalf of
3 PAGA Members. During the course of this litigation, myself along with attorneys from BAM Law
4 have reviewed and analyzed policy and payroll documents provided by our clients or Defendant, as
5 well as a random sampling of employees’ time data produced by Defendant. The investigation,
6 formal discovery, and informal discovery, in this case covered all aspect of the asserted claims,
7 including wage and hour violations, damages, the content and implementation of the wage and hour
8 policies at issue, and issues relating to manageability concerns at trial.

9 9. Plaintiff Carmen Garcia assisted in all aspects of this litigation, including providing
10 factual information relating to her and PAGA Members employment conditions, providing a
11 substantial number of documents, answering questions regarding factual contentions in this matter,
12 providing valuable feedback on discovery matters, providing input into the mediation brief, and and
13 participating in the mediation. This was important because it directly related to our ability to
14 demonstrate wage and hour violations and to obtain a favorable settlement for the class.

15 10. Following global mediation of both the Garcia Action and the Macaire Action,
16 which contain similar representative claims and cover the same set of aggrieved employees, the
17 parties agreed, as part of the settlement of both matters, to amend the Garcia Action to include the
18 PAGA claims from the Macaire Action and add an additional representative—Arthuro Sarmiento III.
19 Additionally, the parties agreed to dismiss Mr. Macaire’s lawsuit in Los Angeles County once the
20 First Amended Complaint was filed in this matter.

21 11. Plaintiff Garcia’s First Amended Complaint was filed on or about October 9, 2024.
22 A trial date in the this matter has not been set.

23 12. My office and my co-counsel, along with Plaintiffs’ assistance, thoroughly
24 investigated the merits of the claims and potential damages for such claims. The parties engaged in
25 an informal exchange of information related to relevant policies applicable to the PAGA claims, as
26 well as meet and confer efforts with respect to Plaintiffs’ claims. Based on this information, we
27 were able to determine information critical to a reliable damages analysis such as the total number
28 of current and former employees within the statutory period and the total number of pay periods in

1 which violations occurred. This information allowed us to assess both liability and damages and
2 create an accurate damages model. Plaintiffs assisted in all aspects of this litigation including
3 providing factual information relating to their own and similarly situated employees' employment
4 conditions. This was important because it directly related to our ability to maintain this case as a
5 PAGA action under manageability concerns and our ability to obtain a favorable settlement for the
6 PAGA claims.

7 13. Throughout this litigation our office had numerous communications with Defendants'
8 counsel, including via telephone, email, in mediation, discussing our respective positions. The
9 parties engaged in mediation on May 23, 2024, using an experienced and highly regarded wage-and-
10 hour mediator, Michael E. Dickstein. The mediation lasted all day and resulted in a settlement only
11 after Mr. Dickstein persuaded all parties to compromise their respective positions. It was only after
12 substantial, arm's length negotiations and after a full-day mediation that the parties were able to
13 reach a settlement. The negotiations were at all times contentious and adversarial, though still
14 professional in nature.

15 14. Based on the information obtained through informal discovery, and based on the
16 analysis of our retained expert, and further information that was provided and argued at mediation, I
17 have been able to make the following determinations regarding the scope of the PAGA claims in
18 terms of individuals affected, pay periods, and likely value of the claims based on the penalty
19 calculations and likely reductions to be made by the Court. In total, the information obtained
20 through litigation and mediation has allowed me to determine that the maximum likely PAGA
21 exposure we could prove at trial was approximately \$28,784,810, plus attorney's fees and costs for
22 violations of the Labor Code under PAGA. The statutorily authorized discretion that Courts have
23 used to reduce penalties ranges substantially. *See, e.g., Thurman v. Bayshore Transit Mgmt., Inc.*,
24 203 Cal. App. 4th 1112, 1135 (2012) (30% reduction); *Fleming v. Covidien, Inc.*, 2011 U.S. DIST.
25 LEXIS 154590, *9 (C.D. Cal. 2011) (82% reduction). Taking this into account, Plaintiffs' gross
26 recovery under the PAGA settlement of \$4,090,000 equals approximately 14.2% of the total likely
27 civil penalties. Based on this, I believe the proposed PAGA settlement is a fair, reasonable, and
28

1 adequate compromise of claims and represents an excellent result in light of the potentially
2 recoverable penalties at issue and the potential for reduction in the Court's discretion.

3 15. I am the sole owner of Castle Law: California Employment Counsel, PC. In
4 agreeing to represent Plaintiff and take on the PAGA case, I agreed to take this case on a
5 contingency basis, meaning that I would take a percentage of any settlement or judgment should we
6 recover a monetary amount. I have also advanced all costs of litigation at risk of potentially never
7 being reimbursed. I took a risk that we would not recover any money in this matter if we were
8 unsuccessful at trial. I also took on the risk that the case may not be able to proceed to trial due to
9 manageability concerns and/or be subject to an unfavorable summary judgment ruling. However, I
10 believe it is important to make sure employees are able to find affordable representation in order to
11 ensure that employers are treating their employees legally and fairly regarding their wages and
12 other aspects of employment.

13 16. My law firm is a boutique law practice that focuses exclusively on employment
14 litigation. We do not have a large number of attorneys or cases and taking on PAGA actions to
15 vindicate the rights of similarly situated employees and penalties payable to the LWDA represent a
16 substantial risk and burden as PAGA litigation requires a substantial amount of time and financial
17 resources to successfully litigate. I believe the risk experienced by my firm taking on PAGA
18 litigation cases is much more substantial than what typically larger law firms would face.

19 17. I graduated from Franciscan University of Steubenville in 2001, *summa cum laude*,
20 with a double major in philosophy and theology. I received my JD from Pepperdine University
21 School of Law in 2010, *magna cum laude*, and graduated in the top 3% of my class. During law
22 school I was a Lead Articles Editor for the Pepperdine Law Review, served as a teaching assistant
23 for a constitutional law professor Barry McDonald, and externed for then Chief Judge of the Ninth
24 Circuit Court of Appeals, Alex Kozinski. Immediately after law school I spent a year as a judicial
25 law clerk to Judge Williams H. Pryor Jr. of the United States Court of Appeals for the Eleventh
26 Circuit, during which I drafted published and unpublished opinions for the Court and assisted the
27 judge in making judicial determinations.

1 18. I have served on the Executive Committee for the Labor and Employment Section of
2 the Sacramento County Bar Association, and the Board for the Solo and Small Firm Division of the
3 Sacramento County Bar Association. I have given numerous presentations on the topic of
4 California wage-and-hour employment law, including for the National Business Institute and
5 County Bar Associations. In 2018 and 2021, I was selected by a vote of my peers to be included in
6 Sacramento Magazine's list of the Top Lawyers in Sacramento in the Employment Law category.
7 For the last two years I have been recognized as a Super Lawyer (Rising Star), which recognizes no
8 more than 2.5 percent of attorneys in each state.

9 19. Prior to starting my own independent employment law practice in September 2017, I
10 was a Senior Associate in the employment group at Orrick, Herrington & Sutcliffe LLP in its
11 Sacramento, California office, where my hourly rate exceeded \$700.00 per hour. Currently, my
12 standard hourly rate applicable to myself and my Managing Partner, Lisa L. Bradner charged to our
13 defense clients is \$700.00 per hour. The standard hourly rate applicable to my Senior Associate
14 Daniel Richardson charged to defense clients is \$550.00 per hour.

15 20. My office has billed over 290 hours on this case from the time of inception through
16 this PAGA approval motion, for a total of over \$172,000 lodestar amount. Based on the complexity
17 of this PAGA action, time involved, the successful resolution, and risk to my firm in taking on this
18 matter on a contingency basis, I believe a multiplier of at least 6 is appropriate and standard in this
19 area. Attached hereto as **Exhibit B** is a true and correct copy of the billing reports generated by my
20 firm on this matter.

21 21. Prior to working at Orrick, I practiced employment law for about 2 years at Akin
22 Gump Strauss Hauer & Feld LLP in Los Angeles, another highly respected international law firm
23 with a reputable California employment law practice. I have represented numerous Fortune 500
24 companies in high-stakes employment cases involving discrimination, harassment, retaliation,
25 misclassification, claims for unpaid wages, violations of the California Labor Code, PAGA,
26 wrongful termination, and many other employment-related claims. For example, I have defended
27 wage-and-hour class and PAGA cases for employers such as Sears, Starbucks, Morgan Stanley, and
28

1 Michael's Stores to name just a few. I also still represent employers of various sizes in class and
2 PAGA actions.

3 22. My firm has represented numerous individuals in class and PAGA representative
4 actions, including other matters in which class and PAGA action settlements have been approved
5 with me as counsel for Plaintiffs. Courts have routinely awarded my firm common fund fee
6 percentages in class and PAGA cases ranging from 33% to 40%. These cases include, but are not
7 limited to, the following:

- 8 a) *Ryan Devore v. BWW Resources, LLC*, Sacramento Superior Court Case No. 34-
9 2021099304976-CU-OE-GDS (class and PAGA action final approval granted for
10 settlement for \$4,500,000 with 33.33% attorney fee award);
- 11 b) *Rooney v. Save Mart Supermarkets*, Sacramento Superior Court Case No. 34-2020-
12 00274973-CU-OE-GDS (class and PAGA action final approval granted for settlement for
13 \$7,480,000 with 35% attorney fee award);
- 14 c) *Marie Hogan v. Aecom Technical Services, Inc.*, Los Angeles County Superior Case No.
15 19STCV40072 (counsel for Plaintiff, wage-and-hour class action settlement final approval
16 granted; \$3,680,000.00 settlement with 33.33% attorney fee award);
- 17 d) *Aaron Carr v. Howroyd-Wright Employment Agency et al.*, Sacramento Superior Court,
18 Case No. 34-2018-00228290 (counsel for Plaintiff, wage-and-hour class and PAGA
19 action, final approval of settlement for \$1,195,000.00 with 35% attorney fee award);
- 20 e) *Christian Sipin et al. v. Salesforce.com, Inc.*, San Joaquin County Superior Court, Case
21 No. STK-CV-UOE-2019-0004629 (counsel for Plaintiffs, wage-and-hour class and PAGA
22 action, final approval of settlement for \$1,500,000.00 with 35% attorney fee award);
- 23 f) *Sean Lalor et al. v. Mendocino Farms*, Sacramento County Superior Court, Case. No. 34-
24 2020-00277871 (class and PAGA action, final approval granted for \$1,500,000.00 with
25 33.33% attorney fee award);
- 26 g) *Deena Sakhel v. Cogir Management USA Inc.*, San Joaquin County Superior Court, Case
27 No. STK-CV-UOE-2020-0001215 (class and PAGA action, final approval granted for
28 settlement for \$1,300,000.00 with 35% attorney fee award);

- 1 h) *Melody Armstrong et al. v. Ruan Transport Corp.*, San Bernardino County Superior Court,
2 Case No. CIVDS1605897 (class and PAGA action, final approval granted for
3 \$1,480,000.00 with 33.33% attorney fee award);
- 4 i) *Anthony Evans et al v. Direct Delivery Service, Inc. et al.*, San Joaquin County Superior
5 Court Case No. STK-CV-UOE-2020-0003776 (class and PAGA action, preliminary
6 approval granted for settlement for \$900,000.00 with 35% attorney fee award);
- 7 j) *Jerome Williams v. RC Willey Home Furnishings*, Sacramento Superior Court Case No.
8 34-2019-00272003 (class and PAGA action, final approval granted for settlement for
9 \$750,000.00 with 35% attorney fee award);
- 10 k) *Anthony Trujillo v. Valet Living, LLC*, Sacramento Superior Court Case No. 34-2020-
11 00273711 (class and PAGA action, final approval granted for \$750,000.00 with 35%
12 attorney fee award);
- 13 l) *Susan Tanis v. Laser Eye Care of California, LLC et al.*, Sacramento County Superior
14 Court, Case No. 34-2021-00299140 (class and PAGA action, final approval granted for
15 \$720,000.00 with 35% attorney fee award);
- 16 m) *Blythe Ducheneaux v. Villa Sport, et al.*, Placer County Superior Court, Case No. S-CV-
17 0044826 (class and PAGA action, final approval granted for \$626,000.00 with 35%
18 attorney fee award);
- 19 n) *Nicholas Simon v. Maita Enterprises, Inc.*, Sacramento Superior Court Case No. 34-2020-
20 00276615 (PAGA-only action settlement approval for \$410,000.00 with 40% attorney fee
21 award);
- 22 o) *Robert Amador v. Jeff Thompson's Auto Group, Inc.*, El Dorado County Superior Court,
23 Case No. PC20190146 (PAGA-only settlement approved for \$260,000.00 with 40%
24 attorney fee award);
- 25 p) *Virginia Gottlieb v. Agilent Tech.*, Sacramento Superior Case No. 34-2018-0244298
26 (PAGA-only settlement approved for \$300,000.00 with 35% fee award);
27
28

1 q) *Bulos Saliba v. Amerigas Propane*, Sacramento Superior Case No. 34-2019-00257327
2 (counsel for Plaintiff, final approval granted in wage-and-hour class and PAGA action for
3 \$195,000.00 with 40% attorney fee award).

4 23. I have given presentations to numerous legal and business groups on topics related to
5 employment law in California, including but not limited to the following:

- 6 a) *Strategies for a Successful Mediation in Wage and Hour Class and PAGA Actions*, 13th
7 Annual Advanced Wage and Hour Conference, California Lawyers Association
8 b) *Putting in Work: Running a High-Level Employment Law Practice*, Above the Law: The
9 Legal Tech Non-Event with Jared Correia
10 c) *Arbitration Agreements and PAGA Claims: Good News for Employers*, Workplace Wake-
11 Up with Jennifer Shaw
12 d) *Employment Litigation: Perspectives from the "Other Side"* Workplace Wake-Up with
13 Jennifer Shaw
14 e) *Calculating Damages, Exposure & PAGA Penalties for Mediation/Settlement in Wage and*
15 *Hour Class and Representative Actions*, Bridgeport Continuing Education
16 f) *The Mini MBA for Attorneys: Labor and Employment Law Essentials*, National Business
17 Institute
18 g) *How to Become a Pivotal Part of Any Wage and Hour Practice Group*, Sacramento
19 County Bar, Labor and Employment Section
20 h) *Alternative Dispute Resolution in Employment*, National Business Institute
21 i) *Easy as ABC?: What Business Owners Need to Know About Worker Classification*,
22 SCORE Association
23 j) *Negotiations, Settlement, and Mediation*, Federal Bar Association: Sacramento Chapter

24 24. I am requesting attorneys' fees and costs pursuant to the common fund doctrine as I
25 believe it to be applicable to the present case *Serrano v. Priest*, 20 Cal.3d 25, 34–35 (1977) and
26 *Paul, Johnson, Alston & Hunt v. Gaulty*, 886 F.2d 268, 271 (9th Cir. 1989). Plaintiff and our firm
27 have been able to secure an identifiable benefit on behalf of the LWDA and similarly situated
28 employees and equity counsels that the cost of the representation should be born equally amongst

1 all individuals and entities receiving these benefits. The settlement recovery provides an excellent
2 result in light of the legal and factual issues affecting this settlement and is the product of
3 substantial time and effort in analyzing the facts and law applicable to this case. I agreed to take
4 this case on a contingency and as a PAGA action with the possibility that I would not receive any
5 compensation for my time and efforts due to issues regarding merits and/or damages and have
6 carried that substantial financial risk over the past year. I have reviewed fee arrangements and
7 Court ordered fee awards in similar representative litigation settlements and I believe that the
8 33.33% fee requested (\$1,363,333.33 total, to be split evenly between the Plaintiff's firms) is within
9 the accepted ranges and eminently reasonable in light of the results obtained in this case. In my
10 experience with contingency cases in employment law cases, the typical percentage negotiated
11 between parties ranges from a third to fifty percent (33.3% to 50%) in individual litigation. In class
12 action litigation, my experience in my own firm and working with several other firms has been that
13 the typical percentage negotiated between parties and approved by a court ranges from a third to
14 forty percent (33.33% to 40%) based on the same factors. Several Federal District Court Cases
15 have approved common fund based fee requests. These cases include *In re Mego Fin. Corp. Sec.*
16 *Litig.*, 213 F.3d 454, 457, 463 (9th Cir. 2000) (affirming 33% of fund as fee in securities case);
17 *Birch v. Office Depot, Inc.*, USDC Southern District, Case No. 06cv1690 DMS (WMC) (awarding
18 40% fee in a wage and hour class action settlement); *Rippee v. Boston Mkt. Corp.*, USDC Southern
19 District, Case No. 05cv1359 BTM (JMA) (awarding a 40% fee on wage and hour class action
20 settlement). I believe Plaintiffs counsel's request of 33.33% for attorneys' fees is justified given the
21 results obtained on behalf of the similarly situated employees and the LWDA. Moreover, at this
22 time, our firms have advanced all costs for Plaintiffs and putative PAGA members and has not
23 received any compensation whatsoever for our time expended in this case. I am also seeking
24 reimbursement of my office's out-of-pocket costs incurred to date, which are \$11,143.22, therefore
25 I am requesting that the Court approve the maximum cost reimbursement of \$34,000. See **Exhibit**
26 **1, ¶ IV(D)(48)(c)**. Attached hereto as **Exhibit C** is an itemization of costs incurred by my office on
27 this matter to date. See also Declaration of Kyle Nordrehaug in Support of Motion to Approve
28 PAGA Settlement.

25. I have used several class action and PAGA administrator companies in the wage and hour class actions and PAGA actions I have resolved in the past and believe Apex Class Action Administrator will adequately administer the proposed PAGA settlement. Apex has provided a capped fee quote for the cost of administering the PAGA settlement of \$34,000.00. Based on my experience this is a reasonable capped fee.

26. A copy of the proposed Settlement Agreement was submitted to the LWDA on November 1, 2024, pursuant to California Labor Code section 2699(1)(2). A true and correct copy of documents demonstrating the settlement documents were provided to the LWDA and that the LWDA has confirmed receipt are being filed with the Motion as **Exhibit D**.

27. A true and correct copy of the proposed notice to be distributed to similarly situated employees informing them of the settlement and all material terms is being filed with the Motion.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 4th day of November 2024, in Roseville, California.


Timothy B. Del Castillo

Timothy B. Del Castillo

EXHIBIT A



CASTLE LAW

CALIFORNIA EMPLOYMENT COUNSEL, PC

DANIEL E. RICHARDSON
DR@CASTLEEMPLOYMENTLAW.COM
916-245-0122

2999 DOUGLAS BLVD.
SUITE 180
ROSEVILLE, CA 95661

April 14, 2023

For Online Filing:

Labor and Workforce Development Agency
Attn: PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612

Re: *Carmen Garcia v. Caliber Holdings of California LLC, et al.*

Dear Labor Commissioner,

As counsel for, and on behalf of, Carmen Garcia (hereinafter referred to as “Claimant”), I am writing to provide you and the following employer(s) (hereafter “Defendant(s)”) notice pursuant to California Labor Code section 2699.3:

Caliber Holdings of California LLC
2941 Lake Vista Drive
Lewisville, TX 75067

Caliber Holdings LLC
2941 Lake Vista Drive
Lewisville, TX 75067

Caliber Holdings Corporation
2941 Lake Vista Drive
Lewisville, TX 75067

I am setting forth the facts and theories to support each of the counts found within this letter. Please notify us of your intent to investigate any or all of the claims alleged herein against any of the above identified Defendant(s). Should you decide not to investigate, we request that you allow us to seek civil penalties on behalf of the Labor Commissioner, Claimant, and all similarly situated current and former aggrieved employees, pursuant to California Labor Code section 2699(a). A \$75.00 filing fee is being submitted to Department of Industrial Relations, Accounting Unit, 455 Golden Gate Avenue, 10th Floor, San Francisco, CA 94102.

A. FACTS

Defendants employed Claimant from approximately November 2021 to approximately February 2023. Claimant and similarly situated aggrieved employees worked for Defendant(s) as non-exempt employees in California. Claimant and similarly situated aggrieved employees worked for Defendant as non-exempt employees and were paid on hourly basis.

During the relevant period, Defendants did not allow Claimant and similarly situated aggrieved employees to take their statutorily required meal periods. Defendants failed to provide Claimant and other similarly situated aggrieved employees a 30-minute, duty-free meal period before the end of the fifth hour of work as required under the law. Claimant and similarly situated aggrieved employees were instructed to prioritize customers and regularly missed their meal periods and/ or they were provided late due the necessity of taking care of customers. Defendants also adjusted Claimant's and similarly situated aggrieved employees' timecards to reflect they were provided a 30-minute, duty-free meal period when no such break was provided. When Claimant and similarly situated aggrieved employees were provided a meal break before the fifth hour of work, those meal periods were regularly interrupted within 30 minutes of the start of the meal period because the Claimant and similarly situated aggrieved employees were required to assist customers. Work performed during meal breaks was also not compensated, resulting in unpaid off-the-clock work.

Defendants also failed to provide rest periods to Claimant and similarly situated aggrieved employees for every 4 hours worked or major fraction thereof. Defendants' management staff were aware this was occurring and did not ensure rest periods were provided to Claimant and similarly situated employees in compliance with California law.

Defendants failed to pay Claimant and similarly situated aggrieved employees for all statutorily required meal and rest premiums owed for non-compliant and missed meal and rest periods. When Claimant and similarly aggrieved employees were paid meal and rest period premiums, Defendants failed to pay them at the correct rate of pay. Claimant received a production bonus. Defendants failed to pay premiums at the correct rate of pay by failing to include production bonuses in the calculation of meal period premiums.

Defendants also failed to pay Claimant and similarly aggrieved employees sick leave at the correct rate of pay because Defendants failed to include production bonuses in the calculation of paid sick leave.

Additionally, Claimant and similarly situated aggrieved employees were required to incur business-related expenses and were not reimbursed. For example, Claimant and similarly situated employees were required to use their personal cell phones for business purposes, but were not reimbursed by Defendants.

As a result of the violations listed above, Defendants failed to supply Claimant and similarly situated aggrieved employees legally compliant wage statements that accurately reflected, among other things, the amount of meal and rest period premium pay and paid sick leave owed to them. As a result,

Claimant and similarly situated employees were deprived of the information necessary to determine the total wages owed to them from their wage statements alone.

Defendants also did not provide Claimant and similarly situated aggrieved employees all wages, including, without limitation, unpaid meal and rest break premium pay, owed upon their termination or within seventy-two (72) hours of their separation from employment.

Defendants also did not provide Claimant and similarly situated aggrieved employees with payroll records upon request. Shortly after Defendants wrongfully terminated Claimant for discriminatory reasons on the basis of sex, Claimant requested Defendants provide her a copy of her wage statements, but was not provided her wage statements within 21 days as required by Labor Code section 226(f).

Claimant are informed and believe that Defendant(s) committed numerous other violations of the California Labor Code, including but not limited to those identified in this letter. Pursuant to *Huff v. Securitas Sec. Servs. USA, Inc.*, 23 Cal. App. 5th 745 (2018), Claimant intend to seek civil penalties for all violations of the California Labor Code, whether they experienced them personally or not.

B. VIOLATIONS OF THE LABOR CODE EXPERIENCED BY CLAIMANT AND SIMILARLY SITUATED EMPLOYEES

Violation of Labor Code §§ 1194, 1197.1; IWC Wage Order No. 5-2001, § 4 (Failure to Pay Minimum Wages)

During the period Claimants and similarly situated employees were employed by Defendant they were entitled to be paid at least the State's minimum wage rate for each hour that they worked. See, e.g., IWC Wage Order MW-2014, MW-2017; IWC Wage Order No. 5-2001, section (4); Cal. Lab. Code §§ 1194, 1197.1. For the reasons stated above, Defendant did not pay Claimants and similarly situated employees at least minimum wage for all hours worked. Thus, Claimants and similarly situated employees were not paid at least the applicable state minimum wage for all hours worked in violation of the Labor Code.

Violation of Labor Code §§ 510, 1194; IWC Wage Order No. 4-2001, § 3 (Failure to Pay Overtime Wages)

Labor Code sections 510 and 1194 require employers to pay employees overtime for any work in excess of eight (8) hours in one workday and any work in excess of forty (40) hours in any one workweek. Employers must also pay overtime for the first eight (8) hours worked on the seventh day of work in any one workweek. Finally, employers must pay double time for all hours worked in excess of twelve (12) hours in any workday and for all hours worked in excess of eight (8) hours on the seventh day of work in any one workweek. As stated above, Claimant and similarly situated employees worked over eight (8) hours per day and forty (40) hours per week and were not paid overtime wages. Claimant and all similarly situated employees are entitled to recover all unpaid overtime wages.

Violation of Labor Code § 1174 (Failure to Keep Accurate Time Records)

Labor Code section 1174(d) requires employers to keep “payroll records showing the hours worked daily by and the wages paid to . . . employees . . . These records shall be kept in accordance with rules established for this purpose by the commission, but in any case, shall be kept on file for not less than three years.” Defendant did not keep accurate information regarding all hours worked by wages paid to Claimant and similarly situated aggrieved employees, largely by failing to accurately record the correct rates of pay and all time worked on their time records. This was in violation of the Labor Code.

Violation of Labor Code § 226.7 and IWC Wage Order No. 9-2001, § 10(A) (Failure to Provide Meal Periods)

Labor Code section 226.7 and IWC Wage Order No. 9-2001, section 10(A) require employers to provide employees meal periods of thirty (30) minutes per five (5) hours worked. For the reasons stated above, Claimant and similarly situated employees were not authorized and permitted to take legally compliant meal periods pursuant to California law. Defendants also failed to pay meal period premiums at one hour of pay at the employees’ regular rate of pay for their failure to provide meal periods.

Violation of Labor Code § 226.7 and IWC Wage Order No. 5-2001, § 11(A) (Failure to Provide Rest Periods)

Labor Code section 226.7 and IWC Wage Order No. 5-2001, section 11(A) require employers to provide employees paid off-duty rest periods of ten (10) minutes per four (4) hours or major fraction thereof worked. For the reasons stated above, Claimant and similarly situated employees were not authorized and permitted to take legally compliant rest periods pursuant to California law in violation of the Labor Code. Defendants also failed to pay rest period premiums for their failure to provide rest periods.

Violation of Labor Code §§ 226, 226.3 (Failure to Provide Accurate Wage Statements)

Labor Code section 226 requires employers to furnish to employees with “an accurate itemized statement in writing showing (1) gross wages earned, (2) total hours worked by the employee, . . . (3) the number of piece-rate units earned and any applicable piece rate if the employee is paid on a piece-rate basis, (4) all deductions, provided that all deductions made on written orders of the employee may be aggregated and shown as one item, (5) net wages earned, (6) the inclusive dates of the period for which the employee is paid, (7) the name of the employee and only the last four digits of his or her social security number or an employee identification number other than a social security number, (8) the name and address of the legal entity that is the employer . . . and (9) all applicable hourly rates in effect during the pay period and the corresponding number of hours worked at each hourly rate by the employee” For the reasons stated above, Defendants failed to comply with these requirements with respect to Claimant and similarly situated employees in violation of the Labor Code.

Violation of Labor Code §§ 201–203, 256 (Failure to Pay Final Wages)

Labor Code sections 201–203 require that all wages, including minimum wages and meal and rest period premiums, be paid to employees upon separation and/or termination of employment. Here, for the reasons stated above, Claimant and similarly situated employees did not receive all final wages due and owing to them at the time of termination or seventy-two (72) hours thereafter as required by Labor Code sections 201–203. This is in violation of the Labor Code.

Violation of Labor Code § 2802 (Failure to Pay Reimbursements for Expenses)

Labor Code section 2802(a) states that “An employer shall indemnify his or her employee for all necessary expenditures or losses incurred by the employee in direct consequence of the discharge of his or her duties, or of his or her obedience to the directions of the employer, even though unlawful, unless the employee, at the time of obeying the directions, believed them to be unlawful.” For the reasons stated above, Defendants failed to pay required reimbursements to Claimants and similarly situated employees for required business expenses in violation of the Labor Code.

Violation of Labor Code § 226(f) (Failure to Provide Payroll Records Upon Request)

Labor Code section 226(f) provides that an employer is required to allow an employee to inspect or copy pay records within twenty-one (21) days of the request for such records. Here, for the reasons stated above, Claimants and similarly situated employees did not receive all their pay records within 21 days of the request as required by Labor Code section 226(f). This is in violation of the Labor Code.

Violation of Labor Code §§ 245 et seq. (Healthy Workplaces, Healthy Families Act)

Labor Code section 246(l)(1) provides that paid sick leave for nonexempt employees shall be calculated in the same manner as the regular rate of pay for the workweek in which the employee uses paid sick time. For the reasons stated above, Defendants failed to provide Claimant and similarly situated aggrieved employees with paid sick leave at their regular rate of pay as required by the Labor Code.

Other Violations of the Labor Code

Pursuant to *Huff v. Securitas Sec. Servs. USA, Inc.*, 23 Cal. App. 5th 745, 761, 233 Cal. Rptr. 3d 502, 513 (Ct. App. 2018), reh’g denied (June 13, 2018), review denied (Aug. 8, 2018), Claimant intend to seek civil penalties for all violations of the California Labor Code, whether they experienced them personally or not.

If you have any questions or require any further information regarding the facts and theories to support these claims, do not hesitate to contact my office. Pursuant to Labor Code section 2699.3, please notify Defendant(s) and this law office within 60 calendar days of the postmark date of this notice whether the Agency intends to investigate the alleged violations.

Very truly yours,

Castle Law: California Employment Counsel, PC

By: 
Daniel E. Richardson

cc:

Caliber Holdings of California LLC
2941 Lake Vista Drive
Lewisville, TX 75067

Caliber Holdings LLC
2941 Lake Vista Drive
Lewisville, TX 75067

Caliber Holdings Corporation
2941 Lake Vista Drive
Lewisville, TX 75067

EXHIBIT B

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/25/2024	 	Draft attorney declaration in support of Approval Motion. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	3.25h	\$700.00	\$2,275.00	-
10/24/2024	 	Subject: Ron Buchanan has copied you on (Garcia) Garcia Decl ISO PAGA Approval. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
10/22/2024	 	Subject: RE: URGENT Re: Garcia/Macaire v. Caliber Holdings of California, LLC - Long Form Agreements & FAC Draft (CA 2897) Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
10/22/2024	 	Review long form settlement agreement. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
10/21/2024	 	Draft declaration of C. Garcia in support of Approval Motion. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	2.50h	\$700.00	\$1,750.00	-
10/18/2024	 	Subject: URGENT Re: Garcia/Macaire v. Caliber Holdings of California, LLC - Long Form Agreements & FAC Draft (CA 2897) Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
10/09/2024	 	Draft email to Defense counsel re status of Long Form Agreement Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/09/2024		Subject: Re: Carmen Garcia v. Caliber Holdings of California LLC, et al. Case No. S-CV-0050365 First Amended Complaint  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
10/08/2024		Phone call to J. Harmon re status of FAC and Long Form Agreement, and strategy re approval motion.  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.50h	\$700.00	\$350.00	-
10/08/2024		Review and execute FAC  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	1.00h	\$700.00	\$700.00	-
09/12/2024		Subject: Re: Caliber Holdings (CA2897) - Approval  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
09/12/2024		Review further edits by co-counsel to long form settlement agreement drafted by co-counsel (0.2); Review and made edits to stipulation to file amended complaint (0.3); Email co-counsel re settlement (0.1).  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.75h	\$550.00	\$412.50	-
09/12/2024		Subject: Re: Caliber Holdings (CA2897) - Approval  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
09/11/2024		Respond to emails from co-counsel re long form settlement agreement (0.2); make further revisions to long form, including	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.50h	\$550.00	\$1,375.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h 2/46

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		review for internal inconsistencies. (2.1) ● Non-billable						
09/11/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings of California, LLC - Long Form Agreements & FAC Draft (CA 2897) ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
09/11/2024	🕒	Subject: RE: Garcia/Macaire v. Caliber Holdings of California, LLC - Long Form Agreements & FAC Draft (CA 2897) ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
09/10/2024	🕒	Subject: Garcia v. Calliber Holdings CA2897 (Placer, Case No. S-CV-0050365) - Notice of Appearance ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
09/10/2024	🕒	Review notice from co-counsel (0.1); Phone call with co-counsel re scheduling approval hearing (0.1); review availability to schedule approval hearing (0.1); Email co-counsel re scheduling approval hearing (0.2) ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
09/06/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings of California, LLC - Long Form Agreements & FAC Draft (CA 2897)	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
09/06/2024	🕒	Continue working on revisions to long form settlement agreement (1.5); email opposing counsel re modifications to long form settlement agreement (0.4). ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.00h	\$550.00	\$1,100.00	-
09/05/2024	🕒	Detailed review of long form settlement agreement and revisions thereto. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.00h	\$550.00	\$550.00	-
09/04/2024	🕒	Subject: RE: Garcia/Macaire v. Caliber Holdings of California, LLC - Long Form Agreements & FAC Draft (CA 2897) ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/08/2024	🕒	Continue work on individual settlement agreement. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
08/05/2024	🕒	Review terms of MOU for individual settlement (0.2); Phone call with client re settlement (0.2); Work on individual settlement agreement (0.4). ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.75h	\$550.00	\$412.50	-
07/22/2024	🕒	Review status of MOU settlement and newly filed dismissal (0.2); ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/17/2024		Review MOUs and consider whether individual settlement can be accomplished prior to settlement of PAGA action.  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
07/11/2024		Subject: Carmen Garcia v. Caliber Holdings of CA, LLC, et al. - Request for Partial Dismissal  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
07/03/2024		Subject: Carmen Garcia v. Caliber Holdings of CA, LLC, et al. - Plaintiff's Case Management Statement  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
07/03/2024		Subject: Carmen Garcia v. Caliber Holdings of CA, LLC, et al. - Plaintiff's Case Management Statement  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
07/02/2024		Subject: Re: Carmen Garcia 07.22.2024 CMC Statement  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
07/02/2024		Subject: Re: Carmen Garcia 07.22.2024 CMC Statement  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
06/28/2024		Subject: RE: Garcia/Macaire v. Caliber Holdings of California, LLC - Long Form Agreements (CA 2897)	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
06/26/2024	🕒	Subject: RE: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897 - Amended PAGA Notice/Sarmiento III ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
06/21/2024	🕒	Subject: RE: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897 - Amended PAGA Notice/Sarmiento III ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
06/20/2024	🕒	Subject: RE: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897 - Amended PAGA Notice/Sarmiento III ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
06/20/2024	🕒	Phone call with co-counsel re MOU. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
06/19/2024	🕒	Email and phone call to opposing counsel re status of MOU (0.2); phone call with co-counsel re settlement structure. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
06/12/2024	🕒	Subject: FW: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897 ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	-	\$175.00
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/12/2024		Subject: Re: Request for Mediation Data Analysis - Garcia v. Caliber Collision  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
06/11/2024		Subject: RE: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
06/10/2024		Subject: Re: Caliber Holdings - re First Amended Complaint (CA 2897)  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
06/10/2024		Subject: RE: Caliber Holdings - First Amended Complaint  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
06/10/2024		Subject: Re: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
06/10/2024		Subject: Re: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
06/10/2024		Email opposing counsel re signed MOUs (0.1); email co-counsel re first amended complaint (0.1).  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
06/07/2024		Subject: Caliber Holdings - re First	Garcia - Caliber Collision	Tim Del	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Amended Complaint (CA 2897) ● Non-billable	[00501] Caliber Collision	Castillo				
06/07/2024	🕒	Phone call with client re settlement amount. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
06/07/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897 ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
06/07/2024	🕒	Subject: RE: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897 ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
06/05/2024	🕒	Subject: RE: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897 ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
06/05/2024	🕒	Subject: RE: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897 ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/30/2024	🕒	Meet with client re Individual memorandum's of understanding. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.00h	\$550.00	\$550.00	-
05/30/2024	🕒	Review and revise Individual memorandum's of understanding. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.50h	\$550.00	\$825.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/30/2024	 	Review final PAGA memorandum of understanding. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.00h	\$550.00	\$550.00	-
05/29/2024	 	Subject: FW: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897 Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/28/2024	 	Subject: RE: Garcia/Macaire v. Caliber Holdings of California, LLC-CA2897 Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/28/2024	 	Review proposed changes to individual and PAGA memorandum's of understanding. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.00h	\$550.00	\$550.00	-
05/24/2024	 	Meet with client re proposed MOU Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.75h	\$550.00	\$412.50	-
05/24/2024	 	Review proposed MOU Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.00h	\$550.00	\$550.00	-
05/23/2024	 	Subject: Re: Garcia/Macaire v. Caliber Holdings of California - Mediation Agreement Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/23/2024	 	Mediation Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	8.00h	\$700.00	\$5,600.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/23/2024	  Non-billable	Prepare for and attend mediation.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	10.00h	\$550.00	\$5,500.00	-
05/22/2024	  Non-billable	Meet with client in preparation for mediation.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.50h	\$550.00	\$1,375.00	-
05/22/2024	  Non-billable	Subject: Re: Garcia/Macaire v. Caliber Holdings of California	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/22/2024	  Non-billable	Subject: Re: Garcia/Macaire v. Caliber Holdings of California	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/22/2024	  Non-billable	Final review of mediation brief.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.25h	\$550.00	\$1,237.50	-
05/22/2024	  Non-billable	Revise mediation brief	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.50h	\$700.00	\$350.00	-
05/21/2024	  Non-billable	Review and revise mediation brief.	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	2.25h	\$700.00	\$1,575.00	-
05/21/2024	  Non-billable	Subject: Garcia/Mediation Brief	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/21/2024	  Non-billable	Subject: Re: Garcia/Macaire v. Caliber Holdings - Mediation Brief	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/21/2024	  Non-billable	Continue drafting mediation brief.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	6.75h	\$550.00	\$3,712.50	-
05/20/2024	  Non-billable	Meet with client re information for mediation brief.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.25h	\$550.00	\$1,237.50	-
05/20/2024	  Non-billable	Subject: RE: Garcia/Macaire v. Caliber Holdings - Mediation Brief	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/20/2024	  Non-billable	Subject: Re: Request for Mediation Data Analysis - Garcia v. Caliber Collision	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/20/2024	  Non-billable	Subject: Re: Garcia/Macaire v. Caliber Holdings - Mediation Brief	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/20/2024	  Non-billable	Subject: Re: Garcia/Macaire v. Caliber Holdings - Mediation Brief	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/20/2024	  Non-billable	Subject: Re: FW: Request for Mediation Data Analysis - Garcia v. Caliber Collision	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/20/2024	  Non-billable	Begin working on mediation brief.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	4.50h	\$550.00	\$2,475.00	-
05/20/2024		Subject: Re: Caliber/Garcia/	Garcia - Caliber Collision	Tim Del	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Macaire - Confidential Mediation Production ● Non-billable	[00501] Caliber Collision	Castillo				
05/20/2024	🕒	Subject: Re: Caliber/Garcia/Macaire - Confidential Mediation Production ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/17/2024	🕒	Subject: Caliber/Garcia/Macaire - Confidential Mediation Production ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/17/2024	🕒	Subject: Request for Mediation Data Analysis - Garcia v. Caliber Collision ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/17/2024	🕒	Subject: RE: Caliber/Garcia/Macaire - Confidential Mediation Production ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/17/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings of California ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/17/2024	🕒	Subject: Caliber/Garcia/Macaire - Confidential Mediation Production ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/17/2024	🕒	Subject: Re: Caliber/Garcia/Macaire - Confidential Mediation Production ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/17/2024	 	Subject: RE: Garcia/Macaire v. Caliber Holdings - Data Request Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/16/2024	 	Subject: Garcia - Notice of Related Case Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/15/2024	 	Subject: Re: Garcia/Macaire v. Caliber Holdings - Data Request Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/15/2024	 	Subject: Re: Garcia/Macaire v. Caliber Holdings - Data Request Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/15/2024	 	Subject: Re: Garcia/Macaire v. Caliber Holdings - Data Request Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/14/2024	 	Subject: Re: Garcia/Macaire v. Caliber Holdings - Data Request Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/14/2024	 	Subject: RE: Garcia/Macaire v. Caliber Holdings - Data Request Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/14/2024	 	Review issue with data request and email co-counsel re the same Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.50h	\$550.00	\$825.00	-
05/14/2024	 	Subject: Re: Garcia/Macaire v. Caliber Holdings - Data Request	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h 13/46

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
05/14/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings - Data Request ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/13/2024	🕒	Email opposing counsel re data production. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
05/10/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings - Data Request ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/10/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings - Data Request ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/10/2024	🕒	Email opposing counsel re data production ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
05/09/2024	🕒	Meet with Managing Partner re settlement strategy ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.75h	\$550.00	\$412.50	-
05/09/2024	🕒	Meet with Attorney Richardson re settlement strategy ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.75h	\$700.00	\$525.00	-
05/09/2024	🕒	Consider settlement strategy based on the number of pay periods ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.75h	\$550.00	\$412.50	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/09/2024	  Non-billable	Review case information	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.75h	\$550.00	\$412.50	-
05/09/2024	  Non-billable	Draft email to co-counsel re brief	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
05/09/2024	  Non-billable	Phone call with co-counsel in preparation for mediation	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
05/09/2024	  Non-billable	Subject: RE: Garcia/Macaire v. Caliber Holdings - Data Request	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/09/2024	  Non-billable	Subject: RE: Garcia/Macaire v. Caliber Holdings - Data Request	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/09/2024	  Non-billable	Subject: FW: Garcia/Macaire v. Caliber Holdings - Mediation Brief	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/09/2024	  Non-billable	Subject: FW: Garcia/Macaire v. Caliber Holdings - Mediation Brief	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/09/2024	  Non-billable	Subject: Re: Garcia/Macaire v. Caliber Holdings - Mediation Brief	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/09/2024	  Non-billable	Subject: Re: Garcia/Macaire v. Caliber Holdings - Mediation Brief	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024

9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/09/2024	  Non-billable	Subject: RE: Garcia/Macaire v. Caliber Holdings - Data Request	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/09/2024	  Non-billable	Subject: Re: Key v. Goodwill Industries	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/09/2024	  Non-billable	Subject: RE: Garcia/Macaire v. Caliber Holdings - Mediation Brief	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/09/2024	  Unbilled	Subject: RE: Garcia/Macaire v. Caliber Holdings - Data Request	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	-	\$175.00
05/09/2024	  Non-billable	Subject: Garcia/Macaire v. Caliber Holdings - Mediation Brief	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/09/2024	  Non-billable	Subject: RE: Garcia/Macaire v. Caliber Holdings - Data Request	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/09/2024	  Non-billable	Phone call with opposing counsel re data exchange	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
05/08/2024	  Non-billable	Phone call with expert re data analysis	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.00h	\$550.00	\$550.00	-
05/07/2024		Meet with Managing Partner re data provided by Plaintiff in preparation for mediation	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.00h	\$550.00	\$550.00	-
					290.75h		\$172,237.50	\$350.00
							290.25h	0.50h

16/46

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
05/07/2024	🕒	Meet with Attorney Richardson re data provided by Plaintiff in preparation for mediation ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	1.00h	\$700.00	\$700.00	-
05/07/2024	🕒	Exchange emails with opposing counsel re data sample ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
05/07/2024	🕒	Email opposing counsel re update for data sample ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
05/07/2024	🕒	Review data provided by Plaintiff in preparation for mediation ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	5.75h	\$550.00	\$3,162.50	-
05/07/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings - Data Request ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/07/2024	🕒	Subject: RE: Garcia/Macaire v. Caliber Holdings - Data Request ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
05/07/2024	🕒	Subject: RE: Garcia/Macaire v. Caliber Holdings - Data Request ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/07/2024	🕒	Subject: RE: Garcia/Macaire v. Caliber Holdings - Data Request ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/07/2024	  Non-billable	Subject: RE: Garcia/Macaire v. Caliber Holdings - Data Request	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
05/07/2024	  Non-billable	Draft Email to expert re data sampling	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.75h	\$550.00	\$412.50	-
04/29/2024	  Non-billable	Meet with Managing Partner re data request from OC	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.50h	\$550.00	\$825.00	-
04/29/2024	  Non-billable	Meet with Attorney Richardson re data request from OC	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	1.50h	\$700.00	\$1,050.00	-
04/29/2024	  Non-billable	Subject: Re: Garcia/Macaire v. Caliber Holdings - Data Request	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
04/29/2024	  Non-billable	Email opposing counsel re data exchange	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
04/10/2024	  Non-billable	Subject: Re: Caliber Holdings (CA2957) Mediation Data Request	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
04/10/2024	  Non-billable	Subject: Re: Caliber Holdings (CA2957) Mediation Data Request	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
04/10/2024		Respond to email from co-counsel re data request.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h 18/46

Activities Export

10/29/2024

9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
04/08/2024	🕒	Subject: Caliber Holdings (CA2957) Mediation Data Request ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
04/08/2024	🕒	Subject: Caliber Holdings (CA2957) Mediation Data Request ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
04/04/2024	🕒	Subject: Garcia/Macaire v. Caliber Holdings of California - Confirming Letter & Mediation Agreement ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
04/04/2024	🕒	Subject: Garcia/Macaire v. Caliber Holdings of California - Confirming Letter & Mediation Agreement ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
03/25/2024	🕒	Subject: Garcia/Macaire v. Caliber Holdings - Data Request ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
03/25/2024	🕒	Draft informal discovery request for mediation and email opposing counsel re the same. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	3.00h	\$550.00	\$1,650.00	-
03/20/2024	🕒	Meet with Managing Partner in preparation for pre-mediation call. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
03/20/2024	🕒	Meet with Attorney Richardson in preparation for pre-mediation call.	Garcia - Caliber Collision [00501]	Lisa Bradner	0.50h	\$700.00	\$350.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

19/46

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable	Caliber Collision					
03/20/2024	🕒	Attend pre-mediation call. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	1.00h	\$700.00	\$700.00	-
03/20/2024	🕒	premeditation call ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.75h	\$700.00	\$525.00	-
03/20/2024	🕒	Attend pre-mediation call. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.00h	\$550.00	\$550.00	-
03/19/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings of California ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
03/19/2024	🕒	Subject: Your Message (971) 326-8784 ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
03/19/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings of California ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
03/19/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings of California ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
03/18/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings of California ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
03/18/2024	🕒	Subject: Re: Garcia/Macaire v.	Garcia - Caliber Collision	Tim Del	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Caliber Holdings of California ● Non-billable	[00501] Caliber Collision	Castillo				
03/15/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings of California ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
03/11/2024	🕒	Subject: Garcia v. Caliber - CMC Continued ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
03/11/2024	🕒	Attend case management conference. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.00h	\$550.00	\$550.00	-
03/08/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings of California ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
03/08/2024	🕒	Subject: Garcia v. Caliber - Dismissal of Caliber Holdings of California, LLC. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
03/08/2024	🕒	Subject: Re: Garcia/Macaire v. Caliber Holdings of California ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
03/08/2024	🕒	Subject: RE: Garcia v. Caliber - Dismissal of Caliber Holdings of California, LLC. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
03/07/2024	🕒	Subject: RE: Carmen Garcia v. Caliber - CMC Caliber Holdings of	Garcia - Caliber Collision [00501]	Lisa Bradner	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50	\$350.00
							290.25h	0.50h
					21/46			

Activities Export

10/29/2024

9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		California, LLC ● Non-billable	Caliber Collision					
03/07/2024	🕒	Review tentative ruling and email opposing counsel re dismissing Caliber Holdings of California. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
03/06/2024	🕒	Subject: CGarcia v. Caliber ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
03/05/2024	🕒	Subject: Garcia/Macaire v. Caliber Holdings of California ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
03/05/2024	🕒	Subject: FW: Garcia/Macaire v. Caliber Holdings of California ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
03/04/2024	🕒	Subject: RE: Time-Sensitive - Carmen Garcia/Chance Macaire/ Caliber Holdings LLC - Mediation ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
03/01/2024	🕒	Subject: Re: Time-Sensitive - Carmen Garcia/Chance Macaire/ Caliber Holdings LLC - Mediation ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
03/01/2024	🕒	Subject: Re: Time-Sensitive - Carmen Garcia/Chance Macaire/ Caliber Holdings LLC - Mediation ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/29/2024		Subject: RE: Time-Sensitive - Carmen Garcia/Chance Macaire/ Caliber Holdings LLC - Mediation  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
02/29/2024		Subject: RE: Time-Sensitive - Carmen Garcia/Chance Macaire/ Caliber Holdings LLC - Mediation  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
02/29/2024		Subject: RE: Time-Sensitive - Carmen Garcia/Chance Macaire/ Caliber Holdings LLC - Mediation  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
02/29/2024		Subject: Re: Time-Sensitive - Carmen Garcia/Chance Macaire/ Caliber Holdings LLC - Mediation  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
02/29/2024		Subject: FW: Time-Sensitive - Carmen Garcia/Chance Macaire/ Caliber Holdings LLC - Mediation  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
02/27/2024		Subject: Re: Carmen Garcia/ Chance Macaire/Caliber Holdings LLC - Mediation  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
02/27/2024		Subject: RE: Carmen Garcia/ Chance Macaire/Caliber Holdings LLC - Mediation  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/22/2024	 	Subject: Garcia v. Caliber Holdings - Plaintiff's CMC Statement Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
02/22/2024	 	Subject: Garcia v. Caliber Holdings - Plaintiff's CMC Statement Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
02/20/2024	 	Subject: RE: Carmen Garcia/ Chance Macaire/Caliber Holdings LLC - Mediation Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
02/20/2024	 	Review and revise case management statement before filing. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
02/20/2024	 	Review email from opposing counsel re mediation. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
02/16/2024	 	Meet with Managing Partner re mediation and strategy. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
02/16/2024	 	Meet with Attorney Richards re mediation and strategy. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.50h	\$700.00	\$350.00	-
02/16/2024	 	Subject: Re: Garcia v. Caliber - Discovery Meet and Confer Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/16/2024		Subject: Re: Garcia v. Caliber - Discovery Meet and Confer  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
02/16/2024		Subject: Re: Garcia v. Caliber - Discovery Meet and Confer  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
02/16/2024		Review email from opposing counsel regarding mediation and consider next steps.  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
02/15/2024		Review discovery issues (0.2); Phone call with opposing counsel (0.1).  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
01/31/2024		Meet with Attorney Richards re discovery issues and strategy to resolve  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	1.00h	\$700.00	\$700.00	-
01/31/2024		Draft detailed follow email summarizing meet and confer call.  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	3.00h	\$550.00	\$1,650.00	-
01/31/2024		Review discovery requests and assess outstanding discovery issues  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.00h	\$550.00	\$1,100.00	-
01/31/2024		Review discovery requests and assess outstanding discovery issues (0.9); draft detailed follow	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.00h	\$550.00	\$1,100.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		email summarizing meet and confer call (1.5). ● Non-billable						
01/31/2024	🕒	Subject: Re: Garcia v. Caliber - Discovery Meet and Confer ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
01/31/2024	🕒	Phone calls with opposing counsel regarding extensive discovery issues ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	3.00h	\$550.00	\$1,650.00	-
01/30/2024	🕒	Subject: Re: Carmen Garcia v. Caliber Holdings of California, LLC et al. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
01/30/2024	🕒	Subject: Re: Carmen Garcia v. Caliber Holdings of California, LLC et al. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
01/30/2024	🕒	Subject: Carmen Garcia v. Caliber Holdings of California, LLC et al. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
01/25/2024	🕒	Subject: (CGarcia) Deposition of PMK ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
01/24/2024	🕒	Emails to opposing counsel re meet and confer. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/24/2024		Research meet and confer requirements ahead of motion to compel  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
01/24/2024		Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
01/24/2024		Subject: RE: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
01/24/2024		Review outstanding discovery issues  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.75h	\$550.00	\$412.50	-
01/23/2024		Subject: Re: (CGarcia) Deposition of Philip Tarin  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
01/22/2024		Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
01/22/2024		Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
01/22/2024		Email opposing counsel re meet and confer efforts.	Garcia - Caliber Collision [00501]	Dan Richardson	0.75h	\$550.00	\$412.50	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable	Caliber Collision					
01/10/2024	🕒	Follow up email to opposing counsel re mediation and discovery responses. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
12/29/2023	🕒	Work on additional discovery requests to Defendant ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	4.25h	\$550.00	\$2,337.50	-
12/29/2023	🕒	Subject: Garcia v. Caliber - Depo Notices/RFPD Set Two ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
12/29/2023	🕒	Subject: Garcia v. Caliber - Depo Notices/RFPD Set Two - Cover Letter ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
12/29/2023	🕒	Subject: Re: Garcia v. Caliber Collision - Depo Notices ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
12/29/2023	🕒	Review and finalize requests for production of documents ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.50h	\$550.00	\$825.00	-
12/28/2023	🕒	work on detailed topics for examination for PMK deposition and requests for production ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	3.25h	\$550.00	\$1,787.50	-
12/28/2023	🕒	Review documents produced in litigation by Defendant	Garcia - Caliber Collision [00501]	Dan Richardson	2.25h	\$550.00	\$1,237.50	-
					290.75h		\$172,237.50	\$350.00
							290.25h	0.50h
								28/46

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable	Caliber Collision					
12/28/2023	🕒	Subject: Re: Garcia v. Caliber Collision - Depo Notices ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
12/28/2023	🕒	Review Defendant's discovery responses ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.00h	\$550.00	\$1,100.00	-
12/27/2023	🕒	Meet with Managing Partner re topics for PMK witnesses ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.75h	\$550.00	\$412.50	-
12/27/2023	🕒	Meet with Attorney Richards re topics for PMK witnesses ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.75h	\$700.00	\$525.00	-
12/27/2023	🕒	Work on topics for PMK notice. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	3.00h	\$550.00	\$1,650.00	-
12/26/2023	🕒	Review discovery issues and begin working on PMK deposition notice. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.25h	\$550.00	\$1,237.50	-
12/15/2023	🕒	Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
12/15/2023	🕒	Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h 29/46

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/15/2023	  Non-billable	Review and respond to email from opposing counsel.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
12/14/2023	  Non-billable	Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
12/14/2023	  Non-billable	Review case status and email opposing counsel re mediation and discovery.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
12/06/2023	  Non-billable	Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
12/06/2023	  Non-billable	Email opposing counsel re mediation.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
11/27/2023	  Non-billable	Attend case management conference.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.25h	\$550.00	\$687.50	-
11/22/2023	  Non-billable	Meet with Managing Partner re issue regarding naming of defendants	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
11/22/2023	  Non-billable	Phone call to client in preparation for CMC.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
					290.75h		\$172,237.50	\$350.00
							290.25h	0.50h
								30/46

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/22/2023		Meet with Attorney Richards re issue regarding naming of defendants  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.50h	\$700.00	\$350.00	-
11/22/2023		Review issue regarding naming of defendants in preparation for CMC.  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
11/22/2023		Subject: Remote Appearance Confirmation (S-CV-0050365 - Garcia, Carmen vs. Tarin, Phillip et al)  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
11/22/2023		Subject: Carmen Garcia CMC Tentative  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
11/17/2023		Phone call with opposing counsel re mediation.  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
11/13/2023		Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
11/13/2023		Review Defendant's case management statement.  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
11/09/2023		Subject: Garcia v. Caliber Holdings of California, LLC, et al. - Placer County Superior Court Case No.	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024

9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		S-CV-0050365 ● Non-billable						
11/09/2023	🕒	Subject: Carmen Garcia v. Caliber - Case Management Statement ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
11/09/2023	🕒	Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
11/09/2023	🕒	Review of case management statement before filing; email opposing counsel re mediation. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
11/01/2023	🕒	Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
11/01/2023	🕒	Subject: Re: Macaire/Garcia v. Caliber Collision ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
11/01/2023	🕒	Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
11/01/2023	🕒	Phone call with opposing counsel; phone call with co-counsel; Email opposing counsel; review related case	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.75h	\$550.00	\$962.50	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
11/01/2023	🕒	Subject: RE: Macaire/Garcia v. Caliber Collision ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
10/30/2023	🕒	Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
10/30/2023	🕒	Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
10/25/2023	🕒	Subject: Re: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
10/25/2023	🕒	Subject: RE: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
10/25/2023	🕒	Subject: RE: Garcia v. Caliber - Meet & Confer Letter/ Stip&Protective Order ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
10/24/2023	🕒	Subject: Garcia v. Caliber - Meet & Confer Letter/Stip&Protective Order ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/23/2023		Continue identifying discovery issues and work on meet and confer letter (2.9); consider additional discovery to propound on defendant (0.5).  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	3.50h	\$550.00	\$1,925.00	-
10/20/2023		Continue working on detailed meet and confer letter outlining extensive deficiencies in responses to five sets of written discovery.  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	4.75h	\$550.00	\$2,612.50	-
10/19/2023		Continue working on detailed meet and confer letter in preparation of motion to compel further discovery response.  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	3.50h	\$550.00	\$1,925.00	-
10/17/2023		Continue working on detailed meet and confer letter in preparation for possible motion practice.  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	3.25h	\$550.00	\$1,787.50	-
10/16/2023		Continue review of discovery responses to identify deficiencies and draft meet and confer letter.  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.25h	\$550.00	\$1,237.50	-
10/13/2023		Meet with Managing Partner re motion to compel discovery responses from Defendant  Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.00h	\$550.00	\$550.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/13/2023	 	Phone conference with client re Defendant's discovery responses Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.25h	\$550.00	\$1,237.50	-
10/13/2023	 	Meet with Attorney Richardson re motion to compel discovery responses from Defendant Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	1.00h	\$700.00	\$700.00	-
10/13/2023	 	Subject: Re: Garcia v. Caliber Holdings Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
10/13/2023	 	Email opposing counsel re extension of deadline to file motion to compel (0.2); Continue working on motion to compel Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	3.25h	\$550.00	\$1,787.50	-
10/11/2023	 	Review discovery issues for meet and confer correspondence. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.50h	\$550.00	\$825.00	-
10/05/2023	 	Subject: RE: Caliber Holding (CA2897) - Joint Prosecution Agreement - Signature Needed Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
10/04/2023	 	Review upcoming deadlines for motion to compel. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
09/20/2023		Continue review of discovery responses and consider grounds for bringin motion to compel.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	3.00h	\$550.00	\$1,650.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
09/19/2023	🕒	Review discovery responses and begin drafting meet and confer letter covering deficiencies. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.50h	\$550.00	\$1,375.00	-
09/18/2023	🕒	Subject: Re: Caliber Holding (CA2897) - Joint Prosecution Agreement - Signature Needed ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
09/13/2023	🕒	Subject: Re: Caliber Collision JPA ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
09/13/2023	🕒	Subject: Caliber Collision JPA ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
09/13/2023	🕒	Subject: RE: Johnson v. Nugget Market - Mediation Availability ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
09/13/2023	🕒	Review previously filed case); Update JPA. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.50h	\$550.00	\$825.00	-
09/11/2023	🕒	Consider case strategy and review PAGA filings to review previously filed PAGA case; and work on JPA. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.75h	\$550.00	\$962.50	-
08/30/2023	🕒	Subject: RE: Garcia v. Caliber	Garcia - Caliber Collision	Lisa	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Holdings - Rule 3.724 Meet and Confer ● Non-billable	[00501] Caliber Collision	Bradner				
08/30/2023	🕒	Subject: Carmen Garcia v. Caliber Holdings of California, LLC et al. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/30/2023	🕒	Subject: Carmen Garcia v. Caliber Holdings of California, LLC et al. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
08/30/2023	🕒	Subject: RE: Garcia v. Caliber Holdings - Rule 3.724 Meet and Confer ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
08/29/2023	🕒	Phone call with opposing counsel and consider strategy going forward regarding PAGA claim and discovery. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
08/21/2023	🕒	Subject: Re: Garcia v. Caliber Holdings - CMC ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
08/10/2023	🕒	Subject: RE: Garcia v. Caliber Holdings - Rule 3.724 Meet and Confer ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/07/2023	🕒	Meet with Managing Partner re meet and confer call with opposing counsel and strategy re mediation.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.75h	\$550.00	\$412.50	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
08/07/2023	🕒	Meet with Attorney Richardson re meet and confer call with opposing counsel and strategy re mediation. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.75h	\$700.00	\$525.00	-
08/07/2023	🕒	Subject: Re: Garcia v. Caliber Holdings - Rule 3.724 Meet and Confer ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
08/07/2023	🕒	Subject: Re: Garcia v. Caliber Holdings - Rule 3.724 Meet and Confer ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/07/2023	🕒	Subject: Re: Garcia v. Caliber - Rule 3.724 ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/07/2023	🕒	Subject: Re: Taylor v PBK - Subpoenas rcvd ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/07/2023	🕒	Email opposing counsel regarding required meet and confer; Review topics in advance of meet and confer call with opposing counsel; Teams meeting with opposing counsel regarding M&C re Rule 3.724; Email opposing counsel regarding meet and confer call; Review arbitration agreement and consider strategy re mediation.	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	3.25h	\$550.00	\$1,787.50	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
08/04/2023	🕒	Meet with Managing Partner re service of individual defendant and discovery to Defendant ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.00h	\$550.00	\$550.00	-
08/04/2023	🕒	Meet with Attorney Richardson re service of individual defendant and discovery to Defendant ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	1.00h	\$700.00	\$700.00	-
08/04/2023	🕒	Subject: Re: Garcia v. Caliber Holdings - Rule 3.724 Meet and Confer ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/04/2023	🕒	Subject: Carmen Garcia v. Caliber Holdings of California, LLC et al. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/04/2023	🕒	Subject: Garcia v. Caliber Collision - CMC Statement ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
08/04/2023	🕒	Subject: FW: Caliber Collision Discovery ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
08/04/2023	🕒	Subject: RE: Garcia v. Caliber Holdings - Rule 3.724 Meet and Confer ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/04/2023	 	Subject: Carmen Garcia v. Caliber - Discovery Requests Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
08/04/2023	 	Subject: eServe notification for Garcia, Carmen vs. Tarin, Phillip et al Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
08/04/2023	 	Subject: Carmen Garcia v. Caliber Holdings of California, LLC et al. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
08/04/2023	 	Subject: Carmen Garcia v. Caliber - Discovery Requests Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/04/2023	 	Subject: Re: Nugget Market Inc. adv. Tyler Johnson Claim #KY23K2624116 Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/04/2023	 	Subject: RE: Garcia v. Caliber Holdings - Rule 3.724 Meet and Confer Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/04/2023	 	Subject: FW: Caliber Collision Discovery Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/04/2023	 	Subject: Garcia v. Caliber Collision - CMC Statement Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50	\$350.00
							290.25h	0.50h

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/04/2023	 	Subject: Caliber Collision Discovery Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
08/04/2023	 	Work on Case Management Statement; Email opposing counsel re scheduling meet and confer call; consider strategy to serve individual defendant; draft new written discovery to propound on Defendant Caliber. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.25h	\$550.00	\$1,237.50	-
07/14/2023	 	Subject: Re: Garcia v. Caliber Holdings of California et al. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
07/14/2023	 	Subject: Re: Garcia v. Caliber Holdings of California et al. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
07/13/2023	 	Subject: RE: Garcia v. Caliber Holdings of California et al. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
07/13/2023	 	Subject: Garcia v. Caliber Holdings of California et al. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
07/13/2023	 	Subject: Carmen Garcia Discovery Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
07/13/2023	 	Review and revise discovery requests.	Garcia - Caliber Collision [00501]	Tim Del Castillo	0.75h	\$700.00	\$525.00	-
					290.75h		\$172,237.50	\$350.00
							290.25h	0.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable	Caliber Collision					
07/08/2023	🕒	Continue working on extensive requests for production of documents. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.75h	\$550.00	\$1,512.50	-
07/05/2023	🕒	Continue working on requests for production of documents. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.75h	\$550.00	\$1,512.50	-
06/30/2023	🕒	Work on requests for production to Defendant. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	4.00h	\$550.00	\$2,200.00	-
06/29/2023	🕒	Continue working on written discovery requests including, special interrogatories and requests for admission. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.50h	\$550.00	\$825.00	-
06/28/2023	🕒	Continue drafting written discovery. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.50h	\$550.00	\$1,375.00	-
06/27/2023	🕒	Work on special interrogatories. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.25h	\$550.00	\$1,237.50	-
06/26/2023	🕒	Work on written discovery requests, including special interrogatories. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.75h	\$550.00	\$1,512.50	-
06/06/2023	🕒	Subject: Carmen Garcia v. Caliber	Garcia - Caliber Collision	Lisa	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		- Defendant Phillip Tarin ● Non-billable	[00501] Caliber Collision	Bradner				
06/06/2023	🕒	Subject: Carmen Garcia v. Caliber - Defendant Phillip Tarin ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
06/06/2023	🕒	Review status of service of defendants and assess whether entity defendants were properly served based on information provided in answer filed by Caliber Holdings LLC (0.2); email opposing counsel regarding service of individual defendant (0.1). ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
06/05/2023	🕒	Meet with Managing Partner re grounds for filing demurrer to answer. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.50h	\$700.00	\$350.00	-
06/05/2023	🕒	Meet with Attorney Ricahrdson re grounds for filing demurrer to answer. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.50h	\$700.00	\$350.00	-
06/05/2023	🕒	Consider grounds for filing demurrer to answer. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
06/02/2023	🕒	Work on written discovery requests. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	4.50h	\$550.00	\$2,475.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/30/2023	 	Phone call to client re answer to complaint. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
05/30/2023	 	Review answer to complaint. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.25h	\$550.00	\$137.50	-
04/26/2023	 	Subject: Re: Carmen Garcia v. Caliber Holdings of California, LLC Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
04/26/2023	 	Respond to email from opposing counsel Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	0.50h	\$550.00	\$275.00	-
04/25/2023	 	Subject: RE: Carmen Garcia v. Caliber Holdings of California, LLC Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.25h	\$700.00	\$175.00	-
04/25/2023	 	Further review of arbitration agreement to assess enforceability; Emails with opposing counsel regarding service Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.50h	\$550.00	\$825.00	-
04/24/2023	 	Complete application for right to sue from Civil Rights (0.4); Finalize complaint and ancillary documents (0.9). Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.50h	\$550.00	\$825.00	-
04/23/2023	 	Revise complaint Non-billable	Garcia - Caliber Collision [00501]	Tim Del Castillo	0.50h	\$700.00	\$350.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024
9:22 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Caliber Collision								
04/21/2023		Phone call with client (0.2); further review of case documents and documents supplied by former employer (0.5); continue working on complaint (6.4). Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	7.25h	\$550.00	\$3,987.50	-
04/20/2023		Review and revise draft complaint. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	2.25h	\$700.00	\$1,575.00	-
04/20/2023		Work on drafting complaint. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	3.50h	\$550.00	\$1,925.00	-
04/19/2023		Meet with Attorney Richardson re complaint. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	0.75h	\$700.00	\$525.00	-
04/17/2023		further review of policies provided by employer in response to document demand. Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	1.50h	\$550.00	\$825.00	-
04/17/2023		Research and assess potential claim for associational disability claim Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.50h	\$550.00	\$1,375.00	-
04/17/2023		Phone call with client to discuss facts of the case Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.50h	\$550.00	\$1,375.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

Activities Export

10/29/2024

9:22 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/14/2023		Review personnel file; assess arbitration agreement; analyze potential claims; work on complaint ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	5.00h	\$550.00	\$2,750.00	-
04/14/2023		Subject: State of California - Department of Industrial Relations Customer Receipt / Purchase Confirmation ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
04/11/2023		Assess information provided by client and develop potential claims (2.1); work on letter to LWDA re PAGA claims. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	4.00h	\$550.00	\$2,200.00	-
04/07/2023		Assess potential grounds for bringing PAGA action. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Dan Richardson	2.25h	\$550.00	\$1,237.50	-
03/16/2023		Review client information in preparation for filing PAGA notice and complaint ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Lisa Bradner	1.25h	\$700.00	\$875.00	-
03/08/2023		Subject: Carmen Garcia has Submitted the Form 'Client Intake Questionnaire' for the Matter 'Unassigned (Carmen Garcia)'. ● Non-billable	Garcia - Caliber Collision [00501] Caliber Collision	Tim Del Castillo	0.25h	\$700.00	\$175.00	-
					290.75h		\$172,237.50 290.25h	\$350.00 0.50h

EXHIBIT C

Activities Export

11/04/2024

12:01 PM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/04/2024	\$	Notice: Settlement of Entire Case - Filing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$15.14	-	\$15.14
07/25/2024	\$	Dismissal: Partial w/o Prejudice - Filing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$15.09	-	\$15.09
07/17/2024	\$	Remote App Refund CMC ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Victoria Anyanwu	1.00	-\$22.50	-	-\$22.50
07/17/2024	\$	07.22.2024 CMC Remote App Fee ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Victoria Anyanwu	1.00	\$27.50	-	\$27.50
07/05/2024	\$	CMCS - Filing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$15.09	-	\$15.09
06/14/2024	\$	Analysis - Berger Consulting Group ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$2,182.50	-	\$2,182.50
04/01/2024	\$	Mediation Fee - mailing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$0.64	-	\$0.64
04/01/2024	\$	1/2 Plaintiff's Fee for Mediation. BAM Law to cover other half. ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$8,100.00	-	\$8,100.00
03/13/2024	\$	Dismissal: Partial w/o Prejudice - Filing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$17.40	-	\$17.40
							\$0.00 0.00h	\$11,143.22 0.00h

Activities Export

11/04/2024

12:01 PM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/06/2024	\$	Remote Appearance at 3.11.24 CMC ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Victoria Anyanwu	1.00	\$27.50	-	\$27.50
02/23/2024	\$	CMCS - Filing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$17.40	-	\$17.40
11/22/2023	\$	Remote Appearance Fee CMC 11.27.23 ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$27.50	-	\$27.50
11/17/2023	\$	CMCS - Filed ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$15.34	-	\$15.34
11/13/2023	\$	Re-File of CMC Statement - Filing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$13.33	-	\$13.33
08/31/2023	\$	Tarin - POS of Summons - Filing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$15.34	-	\$15.34
08/10/2023	\$	NAR Tarin - Mailing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$2.31	-	\$2.31
08/08/2023	\$	CMC Statement - Filing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$15.34	-	\$15.34
07/13/2023	\$	Discovery Request - Postage ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$2.31	-	\$2.31
							\$0.00 0.00h	\$11,143.22 0.00h

Activities Export

11/04/2024

12:01 PM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/25/2023	\$	POS of Summons - Filing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$15.34	-	\$15.34
05/02/2023	\$	Postage for POS of Summons Mailing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$0.60	-	\$0.60
05/02/2023	\$	Process Service of Complaint on Caliber holdings of CA, LLC Fee ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Victoria Anyanwu	1.00	\$41.18	-	\$41.18
04/26/2023	\$	Complaint Filing & First Appearance Fee ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Victoria Anyanwu	1.00	\$463.17	-	\$463.17
04/24/2023	\$	Right to Sue - Cal Hold LLC - Postage ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$8.34	-	\$8.34
04/24/2023	\$	Right to Sue - Cal Holding of CA - Postage ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$8.34	-	\$8.34
04/24/2023	\$	Right to Sue - Tarin - 2 - Postage ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$8.34	-	\$8.34
04/24/2023	\$	Right to Sue - Cal Hold Corp - Postage ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$8.34	-	\$8.34
04/24/2023	\$	Right to Sue - Philip Tarin - Postage ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$8.34	-	\$8.34
							\$0.00 0.00h	\$11,143.22 0.00h

Activities Export

11/04/2024
12:01 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/14/2023	\$	PAGA Letter - 3 - Postage ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$4.75	-	\$4.75
04/14/2023	\$	PAGA Letter - 2 - Postage ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$4.75	-	\$4.75
04/14/2023	\$	PAGA Letter 1 - Postage ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$4.75	-	\$4.75
04/14/2023	\$	PAGA Filing ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$75.00	-	\$75.00
03/16/2023	\$	Records Request - ● Unbilled	Garcia - Caliber Collision [00501] Caliber Collision	Ron Buchanan	1.00	\$4.75	-	\$4.75
							\$0.00 0.00h	\$11,143.22 0.00h

EXHIBIT D

From: DIR PAGA Unit <no-reply@formassembly.com>
Date: Friday, November 1, 2024 at 11:10 AM
To: Lisa Bradner <LB@castleemploymentlaw.com>
Subject: Thank you for your Proposed Settlement Submission

11/01/2024 11:09:42 AM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm