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David W. Slayton,
Executive Officer/Clerk of Court,
By S. Drew, Deputy Clerk

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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

CHETERRA YOUNG, an Individual, on behalf
of herself and all others similarly situated,

Plaintiff,

v.

PFT ALEXANDER, INC., a California
corporation; and DOES 1 through 10, inclusive,

Defendants.

CASE NO. 23STCV07449

CLASS AND REPRESENTATIVE ACTION

Assigned For All Purposes To:
Hon. Timothy Patrick Dillon

**DECLARATION OF DAVID R.
MARKHAM IN SUPPORT OF
PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS AND
REPRESENTATIVE ACTION
SETTLEMENT**

Final Approval Hearing:
Date: March 25, 2026
Time: 10:00 a.m.
Dept: 15

Action filed: April 5, 2023
Trial Date: None Set

1 I, David R. Markham, declare:

2 1. I am an attorney licensed to practice before all courts of the State of California. I am
3 counsel of record for Plaintiff Cheterra Young in this action. I make this Declaration in support of
4 Plaintiff's Unopposed Motion for Final Approval of Class and Representative Action Settlement. I
5 make this declaration based on my personal knowledge, and if called to testify, I could and would
6 competently testify to the matters contained in this declaration. I join in the description provided by my
7 co-counsel in their concurrently filed declaration in support of approval of this settlement.

8 2. The Class and Representative Settlement in this action is the product of arms'-length
9 bargaining between attorneys who are highly experienced in complex class and representative actions.
10 We thoroughly evaluated the evidence supporting the claims and defenses at issue and were very well
11 positioned to evaluate the Settlement's relative strengths and benefits. The parties are well-versed in
12 the evidentiary record upon which Plaintiff's claims are based. We engaged in pre-mediation exchange
13 of information, damages analysis and mediation. Meaningful discovery led to a point where the parties
14 were well postured to resolve this action.

15 **Qualifications of Class Counsel**

16 3. I am The Markham Law Firm's founding partner. I graduated from Cornell University
17 and Columbia Law School, and have been practicing law in California since 1976. I have extensive
18 experience in class action litigation, including wage and hour, consumer, antitrust, and securities
19 litigation. I have been acting lead or co-lead counsel and appointed class counsel in hundreds of class
20 and representative action cases in federal and state courts in California and throughout the United
21 States, including over thirty reported and widely-cited appellate cases. I have conducted trials in over
22 twenty cases, both bench and jury trials, including class action trials.

23 4. My firm has obtained many large class and representative action settlements which have
24 benefited consumers and employees. Two of those cases alone have resulted in recovery of over a
25 billion dollars for class members. In *Jordan v. California Department of Motor Vehicles*, we obtained a
26 settlement fund of over \$665 million for the benefit of new California residents who registered their
27 out-of-state vehicles and were unlawfully charged the \$300 smog impact fee. *Jordan v. California*
28

1 *Dep't of Motor Vehicles*, 100 Cal. App. 4th 431, 440, (2002), as modified on denial of reh'g (Aug. 20,
2 2002). In *Sparks v. AT&T et al.*, a settlement fund of over \$350 million was obtained for consumers
3 nationwide who had been overcharged for residential telephone equipment. Case No. 96-LM-983, 01-
4 L-1668 (Ill. Cir. Ct., Madison County).

5 5. My firm's settlements in wage and hour case include *Conteras v. Bank of America*,
6 where we reached a settlement fund of over \$16.5 million (San Francisco Superior Court, Case No.
7 CGC-07467749, Sept. 3, 2010). In *Nelson v. St. Paul Fire and Marine Insurance Company*, we reached
8 a settlement of \$24.5 million (Case No. 95-G-1088 Brazoria County, Texas, 1996). Further, I settled
9 *Zwart v. John Hancock Mutual Life Insurance Company* for \$3 million (Case No. 673902, San Diego
10 Superior Court, 1995). Other California wage and hour settlements in cases where I was lead counsel
11 include *Friend v. Wellpoint / Blue Shield*, Case No. BC345147 (Los Angeles Super. Ct., Aug. 22, 2007)
12 which settled for \$6 million, and *Gruender v. American Title Co.*, Case No. 06CC0197 (Orange County
13 Superior Court, 2008), which I settled for \$11 million.

14 6. More recent wage and hour settlements that my firm has reached include a \$8,000,000
15 settlement in *XESP v. BF Borgers CPA PC et al.*, Case No. 2024CV030771, District Court of the State
16 of Colorado, finally approved on December 11, 2025; a \$11,000,000 settlement in *Robertson v.*
17 *Amazon*, Case No., 3:14-md-2504-DJH, United States District Court for the Western District of
18 Kentucky, finally approved on December 23, 2024; a \$11,500,000 settlement in *Harrison v. Bank of*
19 *America*, Case No. 3:19-cv-00316-LB, United States District Court for the Northern District of
20 California, finally approved on November 24, 2021; a \$4,600,000 settlement in *Vasquez v. Bank of*
21 *America*, Case No. CGC-18-571669, San Francisco Superior Court, finally approved on July 29, 2022;
22 a \$1,200,000 settlement in *Townsend v. Maxim*, Case No. 22-CV-005450, Alameda Superior Court,
23 finally approved on December 4, 2025; a \$665,000 settlement in *Gibson v. Ross*, Case No.
24 23CV048864, Alameda Superior Court, finally approved on December 12, 2025; a \$1,375,000
25 settlement in *Diaz et al. v. United Parcel Service, Inc.*, United States District Court for the Eastern
26 District of California, Case No. 1:22-cv-00246-CDB, finally approved on December 13, 2023; a
27 \$24,000,000 global settlement in *Esteban v. American Airlines*, Case No. 20STCV47361, Los Angeles
28

1 Superior Court, finally approved on April 26, 2024; a \$2,000,000 settlement in *Stewart v. Del Monte*,
2 Case No. 1:22-CV-04919-RMI, United States District Court for the Northern District of California,
3 finally approved on May 29, 2024; a \$2,900,000 settlement in *Swayzer et al. v. Circle K*, Case No. 34-
4 2018-00234999, Sacramento Superior Court, finally approved on February 18, 2022; a \$1,000,000
5 settlement in *Scott v. Sutter*, Case No. CVUJ-2022-1146, Del Norte Superior Court, finally approved
6 on April 25, 2025; a \$775,000 settlement in *Ward v. Sutter*, Case No. 34-2020-00279954-CU-OE-GDS,
7 Sacramento Superior Court, finally approved on January 10, 2025; a \$ 975,000 settlement in *Shaw v.*
8 *Kaiser Foundation Health Plan, Inc.*, Case No. CVRI2102203, Riverside Superior Court, finally
9 approved on January 10, 2024; a \$750,000 settlement in *Almanzar v. Home Depot U.S.A., Inc.*, Case
10 No. 2:20-cv-00699-KJN, United States District Court for the Eastern District of California, finally
11 approved on January 3, 2024; a \$750,000 settlement in *Delamora, et al. v. Thorpe Design, Inc.*, Case
12 No. C22-00931, Contra Costa Superior Court, finally approved on October 2, 2023; a \$800,000
13 settlement in *Slaughter v. California C.C.S. P.C., dba Wellpath*, Case No. CIVDS1935187, San
14 Bernardino Superior Court, finally approved on May 6, 2022; a \$750,000 settlement in *Antenucci v.*
15 *Bank of the West*, Case No. CGC-20-583746, San Francisco Superior Court, finally approved on
16 December 7, 2022, a \$1,000,000 settlement in *Kelly v. Simco Electronics*, Case No. 20CV370177,
17 Santa Clara Superior Court, finally approved on January 19, 2022; a \$5,900,000 settlement in
18 *Hurtubise v. Sutter East Bay Hospitals*, Case No. RG17868819, Sacramento Superior Court, finally
19 approved on December 27, 2021; a \$825,000 settlement in *Fritsch et al. v. Swift Transportation Co.*,
20 Case No. 5:17-cv-02226-VAP-KKx, United States District Court for the Central District of California,
21 finally approved on January 4, 2022; a \$1.62 million PAGA-only Settlement in *Moreno, et al. v. Habit*
22 *Employment, LP, et al.*, Case No. 37-2019-00014576-CU-OE-CTL, San Diego Superior Court,
23 approved on September 10, 2021; a \$2,295,000 settlement in *Veramendi v. Airtouch Cellular Inc., et*
24 *al.*, Case No. BC647309, Los Angeles Superior Court, finally approved on June 3, 2021; a \$438,000
25 settlement in *Valdez v. Pro Unlimited, Inc., et al.*, Case No. CGC-19-574146, San Francisco Superior
26 Court, finally approved on May 10, 2021, an average settlement share of \$5,511.11 per employee in
27 *Hopstein v. Hewlett Packard Enterprise Company (d.b.a. HPE), et al.*, Case No. 17CV305577, Santa
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1 Clara Superior Court, finally approved on December 2, 2020; an average settlement share of \$1,139.71
2 per employee in *Cuevas v. Three Rivers Trucking, Inc.*, Case No. BC655003, Los Angeles Superior
3 Court, finally approved on July 29, 2020; a \$1.2 million class and PAGA representative action
4 settlement in *Hernandez et al. v. SFM, LLC*, Case No. 37-2016-00015169, San Diego Superior Court,
5 finally approved on July 21, 2020 (aff'd March 16, 2022); \$8.7 million settlement in *Evans v. Wal-Mart*
6 *Stores, Inc.*, Case No. 2:10-cv-1224, United States District Court for the District of Nevada, finally
7 approved on July 8, 2020 (Dkt. No. 135); \$35 million settlement in *Merino v. Wells Fargo*, Case No.
8 2:16-cv-07840-ES-MA, United States District Court for the District of New Jersey, finally approved on
9 January 15, 2020 (Dkt. No. 144); an average settlement share of \$1,317.31 per employee in *Angala v.*
10 *Kaiser Foundation Hospitals*, Case No. HG18899291, Alameda County Superior Court, finally
11 approved on January 13, 2020; \$600,000 settlement in *Hoover v. Sedgwick Claims Management*
12 *Services, Inc.*, Case No. 34-2018-00239159, Sacramento Superior Court, finally approved on December
13 6, 2019; \$950,000 settlement in *Bessellieu v. Metro Shore Services, LLC, et al.*, Case No. BC6737001,
14 Los Angeles Superior Court, finally approved on May 21, 2019; \$1.6 million settlement in *Jenkins v.*
15 *The Mentor Network, Inc., et al.*, Case No. 34-2015-00187936, Sacramento Superior Court, finally
16 approved on September 13, 2018; \$27.5 million settlement in *Wells Fargo Wage and Hour Cases*, Case
17 No. JCCP004821, Alameda County Superior Court, finally approved on March 28, 2018; \$2.5 million
18 settlement in *Geilenfeldt v. EDF Renewable Energy, Inc.*, Case No. 37-2016-00001369, San Diego
19 Superior Court, finally approved on March 9, 2018; \$3 million settlement in *Vangsoulatda v. Blue*
20 *Shield*, Case No. CGC-14-543296, San Francisco County Superior Court, finally approved on January
21 25, 2018; \$650,000 settlement in *McCarthy v. Marriott Hotel Services, Inc.*, Case No. 16-cv-293998,
22 Santa Clara Superior Court, finally approved on October 16, 2017; \$4.9 million settlement for
23 insurance adjusters in *Alvarez v. Farmers*, case number 3:14-cv-00574-WHO, finally approved on
24 January 18, 2017 by Judge Orrick (Dkt. No. 189); \$3.77 million settlement for California warehouse
25 workers in *Saldana v. Amazon*, case number 3:14-cv-00290-DJH (W.D. Ky.), finally approved on
26 October 31, 2016 (Dkt. No. 228).

1 7. My other recent California wage and hour settlements also resulted in substantial
2 recoveries for class members. For instance, I settled *Kogok v. T-Mobile USA, Inc.*, Case No. 37-2012-
3 00076945 (San Diego Super. Ct. Jan. 2015) for \$2,750,000; *Johnson v. Metlife Ins. Co.*, Case No. 13-
4 cv-128-JLS-RNB (C.D. Cal. Mar. 19, 2015) for \$1,970,000; *Erickson v. Old Republic Title Company*,
5 Case No. 13-cv-1210-NLS, (S.D. Cal. Feb. 10, 2016) for \$970,000 plus payroll taxes; *Campagna et al.*
6 *v. Language Line Services, Inc.*, Case No. 30-2012-00578934-CU-OE-CXC (Orange County Superior
7 Court, Mar. 14, 2014) for \$900,000; *Anderson et al. v. Oracle Corp.*, Case No. CIV469916/JCCP No.
8 4597 (Alameda Super. Ct., June 2013) for \$850,000; *McDonagh v. Harrah's Las Vegas, Inc., et al.*,
9 Case No. 13-cv-01744 (United States District Court for the District of Nevada, Dec. 13, 2016), for
10 \$850,000.

11 8. I have also been counsel and argued numerous appellate cases in the California Supreme
12 Court and Courts of Appeal, as well as the Ninth Circuit. Among the published decisions from these
13 cases are: *Daniels v. Philip Morris*, 18 F.Supp.2d 1110 (S.D. Cal. 1998); *Washington Mutual Bank v.*
14 *Super. Ct.*, 24 Cal.4th 906 (2001); *Northwest Mortgage Inc. v. Super. Ct.*, 72 Cal.App. 4th 214 (1999);
15 *Taiheiyo Cement Corp. v. Super. Ct.*, 105 Cal.App. 4th 398 (2003); *Ramos v. Countrywide Home*
16 *Loans*, 82 Cal.App.4th 615 (2000); *In re Tobacco II*, 123 Cal.App.4th 617 (2004); *In re Steroid*
17 *Hormone Prod. Cases*, 181 Cal.App.4th 145 (2010).

18 9. In total, I have prosecuted over 250 wage-and-hour class actions.

19 10. Any attorneys' fees awarded in this matter will be allocated 79% to Cohelan Khoury &
20 Singer, and 21% to the Markham Law Firm. Our client has consented to this fee allocation in writing.
21 My firm has prosecuted this litigation solely on a contingent-fee basis, and has been completely at risk
22 that it would not receive any compensation for prosecuting claims against the Defendant.

23 11. The Markham Law Firm's billing for time and costs in this case includes time billed for
24 investigating the claims and drafting pleadings, law and motion practice, attending mediation,
25 reviewing documents and researching legal authorities, and extensive communications and meetings
26 among the parties and counsel. This billing has been prepared from contemporaneous time and
27 bookkeeping records, attached as **Exhibit 1**.

1 12. At the Markham Law Firm, the usual and customarily charged rates of attorneys are:
2 David R. Markham, \$815, Lisa Brevard, \$500, and \$175 for the firm's paralegals. These rates are
3 consistent with the prevailing rates for attorneys of similar experience, skill and reputation, are in line
4 with the market rates in various California legal communities, and were recently approved by several
5 California state and federal courts, including on December 4, 2025 by the Alameda Superior Court in
6 *Townsend v. Maxim*, Case No. 22-CV-005450; on December 12, 2025 by the Alameda Superior Court
7 in *Gibson v. Ross*, Case No. 23CV048864; on April 25, 2025 by the Del Norte Superior Court in *Scott v.*
8 *Sutter*, Case No. CVUJ-2022-1146¹; on January 10, 2025 by the Sacramento Superior Court in *Ward v.*
9 *Sutter*, Case No. 34-2020-00279954-CU-OE-GDS, on October 2, 2023, by the Contra Costa Superior
10 Court in *Delamora, et al. v. Thorpe Design, Inc.*, Case No. C22-00931; on December 7, 2022, by San
11 Francisco Superior Court in *Antenucci v. Bank of the West*, Case No. CGC-20-583746; on July 29,
12 2022, by San Francisco Superior Court in *Vasquez v. Bank of America*, Case No. CGC-18-571669; on
13 May 26, 2022 by Fresno Superior Court in *Moya v. St. Agnes Medical Center*, Case No.
14 20CECG00975; on May 6, 2022 by San Bernardino Superior Court in *Slaughter v. California CCS,*
15 *P.C.*, Case No. CIVDS1935187; on January 19, 2022 by Santa Clara Superior Court in *Kelly v. Simco,*
16 Case No. 20CV370177; on January 4, 2022 by the United States District Court for the Central District
17 of California in *Fritsch et al. v. Swift Transportation Co. of Arizona*, Case No. 5:17-cv-02226-VAP-
18 KKx; on December 27, 2021 by Sacramento Superior Court in *Hurtubise v. Sutter*, Case No.
19 RG17868819; on November 24, 2021 by the United States District Court for the Northern District of
20 California in *Harrison v. Bank of America*, Case No. 3:19-cv-00316-LB; and on September 10, 2021 by
21 San Diego Superior Court in *Moreno, et al. v. Habit Employment, LP, et al*, Case No. 37-2019-
22 00014576-CU-OE-CTL.

23 13. I have devoted 8 hours to the prosecution of this action. We will also incur additional
24 billable time to prepare for and attend the settlement approval hearing, and oversee the settlement
25 administration.
26

27 ¹ The rate for Ms. Brevard has increased from \$400 to \$500 as an attorney with nearly 7 years of experience in wage and hour
28 class actions.

1 14. My former partner, Maggie Realin, devoted 6.3 hours to the prosecution of this action
2 while at my firm.

3 15. My firm's associate, Lisa Brevard, devoted 25.0 hours to the prosecution of this action.
4 Ms. Brevard is a graduate of the University of California, Los Angeles, and University of San Diego
5 School of Law. She received her J.D., summa cum laude, and was admitted to the California Bar in
6 2018. During law school, Ms. Brevard interned at the USD Appellate Clinic, where she presented oral
7 argument before the Ninth Circuit Court of Appeals. She was an active participant on the University of
8 San Diego Appellate Moot Court Board and competed in regional and national competitions.
9 Additionally, she gained legal experience on corporate and litigation matters as a law clerk and summer
10 associate for a national firm. Since joining my firm in May 2019, Ms. Brevard has focused on
11 representing employees in wage and hour class actions.

12 16. My firm's paralegal (and former paralegal during the time that she was employed at my
13 firm), meet the qualifications and continuing education requirements set forth in Business &
14 Professions Code § 6450. My firm's paralegals collectively spent 37.0 hours on this action.

15 17. To prosecute this action, my firm incurred \$4,161.05 in costs. These costs and expenses
16 identified in my firm's costs summary are reflected in the accounting books and records that my law
17 firm maintains in the ordinary course of business, and are prepared from expense records, credit card
18 receipts and statements, and check records. These expenses were necessary for this litigation and
19 include the amounts paid for court filing fees, mediator fees, and service of process charges, all of
20 which are costs normally billed to and paid by the client. These costs were reasonably incurred in the
21 prosecution of this matter and are authorized by the Settlement Agreement.

22 18. I have no conflicts of interest with the class members in this action. I am not related to
23 the named Plaintiff. I have not previously represented Defendant in any matter.

24 19. The Settlement Agreement in this action is the result of vigorous and competent
25 representation of Plaintiff, and arms'-length, contentious negotiations with Defendant to reach the best
26 possible outcome for the Class. Having analyzed the facts and legal theories of this case, and based on
27
28

1 my experience in litigating similar representative wage and hour claims, I believe that the proposed
2 settlement is fair, reasonable and adequate for the Class, and warrants approval.

3 I declare under penalty of perjury under the laws of California and the United States of America
4 that the foregoing is true and correct to the best of my knowledge.

5 Executed on February 18, 2026, at San Diego, California

6 
7 By: _____
8 David R. Markham
9 Attorney for Plaintiff
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Exhibit 1

THE MARKHAM LAW FIRM
Reported Hours, Lodestar, and Costs

NAME	POSITION	TOTAL HOURS	HOURLY RATE	LODESTAR
ATTORNEYS				
David R. Markham	P	8.0	\$815.00	\$6,520.00
Maggie K. Realin	P	6.3	\$700.00	\$4,410.00
Lisa R. Brevard	A	25.0	\$500.00	\$12,500.00
ATTORNEY TOTAL:		39.3		\$23,430.00

PARALEGALS

Leeanna D. Carcione	PL	26.2	\$175.00	\$4,590.25
Noor Haleem	PL	10.8	\$175.00	\$1,890.00
PARALEGAL TOTAL:		37.0		\$6,480.25
GRAND TOTAL:		76.3		\$29,910.25

(P) Partner

(A) Associate

(PL) Paralegal

Expense Charges	\$4,161.05
Subtotal:	\$4,161.05
TOTAL:	\$4,161.05

Young v. PFT Alexander, Inc.; Case No. 23STCV07449

Date	Service	Description	Amount
4/5/2023	LWDA	PAGA filing fee	\$ 75.00
4/5/2023	Postage	fee to mail PAGA letter	\$ 19.44
4/5/2023	One Legal	Credit Card Sale_04885235	\$1,494.99
6/1/2023	Knox Atty Service	Invoice #4402852	\$ 142.75
6/5/2023	One Legal	Credit Card Sale_05044292	\$ 13.33
6/6/2023	One Legal	Credit Card Sale_05046260	\$ 17.66
6/12/2023	One Legal	Credit Card Sale_05062405	\$ 17.66
6/16/2023	Knox Atty Service	Invoice #4404134	\$ 135.15
6/22/2023	One Legal	Credit Card Sale_05086411	\$ 17.66
7/17/2023	One Legal	Credit Card Sale_05151741	\$ 172.08
7/28/2023	Doc Fee	Fee to purchase orders	\$ 9.80
10/5/2023	CaseAnywhere	Invoice_304438	\$ 107.37
1/5/2024	CaseAnywhere	Case_Anywhere_Invoice_314383	\$ 151.41
3/13/2024	Mediation	Kevin Barnes Mediation (21% of fee)	\$ 525.00
4/2/2024	CaseAnywhere	Fee for filing Inv # 324569	\$ 151.41
7/2/2024	CaseAnywhere	Fee for filing Inv # 335510	\$ 151.41
10/7/2024	CaseAnywhere	court filings	\$ 151.41
1/9/2025	CaseAnywhere	filing fee	\$ 151.41
2/6/2025	CaseAnywhere	System Access Fee	\$ 50.47
3/5/2025	CaseAnywhere	System Access Fee	\$ 50.47
4/9/2025	CaseAnywhere	System Access Fee	\$ 50.47
5/9/2025	CaseAnywhere	Account maintainece fee	\$ 50.47
6/2/2025	CaseAnywhere	System Access Fee	\$ 50.47
7/1/2025	CaseAnywhere	System Access Fee	\$ 50.47
8/5/2025	CaseAnywhere	Account maintainece fee	\$ 50.47
9/4/2025	CaseAnywhere	Account maintainece fee	\$ 50.47
10/1/2025	CaseAnywhere	Maintaince Fee	\$ 50.47
11/13/2025	CaseAnywhere	Account maintainece fee	\$ 50.47
12/1/2025	CaseAnywhere	Account maintainece fee	\$ 50.47
1/5/2026	CaseAnywhere	Account maintainece fee	\$ 50.47
2/4/2026	CaseAnywhere	Account maintainece fee	\$ 50.47
Total			\$4,161.05

David Markham, Esq., Founding Partner (\$815/hr; admitted 1976)

Date	Task	Time
3/20/2023	Review interview notes	0.1
3/20/2023	Review handbook & email from MR prior to call with prospective client	0.2
4/4/2023	Review redlined edits to letter & complaint	0.1
4/5/2023	Emails re complaint for filing	0.1
5/23/2023	Emails re service of complaint	0.1
6/12/2023	Review PAGA complaint for filing	0.2
7/28/2023	Review case management orders	0.1
12/11/2023	Review emails w/ defense re time & pay records	0.1
1/30/2024	Review email from defense counsel	0.1
3/12/2024	Emails re mediation	0.1
3/13/2024	Emails re mediation	0.1
3/14/2024	Review mediation agreement	0.1
3/27/2024	Email LB re mediation fee & JPA	0.1
3/28/2024	Email LB re mediation fee & JPA; call w/ LB	0.2
3/29/2024	Email re mediation	0.1
4/16/2024	Call w/ LB re JPA	0.1
4/24/2024	Emails w/ LB re demand; exposure	0.1
5/1/2024	Attend mediation (w/ LB & MR) (1/2 day)	4
5/1/2024	Review mediator's proposal	0.1
5/2/2024	Emails re mediator proposal	0.3
5/3/2024	Emails re MOU	0.2
5/7/2024	Review email from defense re MOU	0.1
5/30/2024	Review emails re admin bids	0.1
7/8/2024	Email LB re proposed order for PA	0.2
8/14/2024	Emails re settlement agreement	0.1
8/15/2024	Review PA brief & review/edit my dec.	0.2
9/10/2025	Review minute order	0.1
11/21/2025	Review email from administrator w/ schedule	0.1
12/18/2025	Review email from admin re notice	0.1
12/18/2025	Review notice documents & settlement form	0.1
2/9/2026	Email re final approval dec	0.1
est.	Review & edit my final dec	0.2
	Total	8

Maggie Realin, Esq., Former Partner (\$700/hr; admitted 2009)

Date	Task	Time
3/28/2023	review and edit engagement letter	0.4
4/4/2023	review and edit PAGA letter	0.7
4/4/2023	review and edit class action complaint	1.2
4/5/2023	review and further edit PAGA letter and complaint	0.4
8/21/2023	review answer to complaint, email exchange with LB re same	0.8
8/31/2023	call with defense counsel re claims and potential mediation	0.3
8/31/2023	follow up call with LB re claims & strategy	0.2
8/31/2023	email to LB re D's position and info	0.1
10/20/2023	review email from defense counsel data sample	0.1
12/14/2023	review time and payroll records	0.6
12/14/2023	email to LB re time and payroll records	0.1
12/19/2023	review file re meal break and payroll violations, email to LB	0.8
12/19/2023	call with LB re case strategy and next steps	0.1
1/26/2024	draft memo re settlement/mediation strategy	0.5
	Total	6.3

Lisa Brevard, Esq., Associate Attorney (\$500/hr; admitted 2018)

Date	Task	Time
3/20/2023	Review interview notes; emails & call w/ MR	0.3
3/20/2023	Review interview notes; handbook & email from MR prior to call with prospective client	0.5
3/20/2023	Call w/ MR & prospective client; follow-up call w/ MR	0.4
3/28/2023	Messages w/ MR	0.1
4/4/2023	Review redlined edits to letter & complaint	0.3
4/5/2023	Emails re complaint for filing	0.1
5/23/2023	Review case deadlines; emails re service of complaint	0.2
5/24/2023	Emails re service of complaint	0.1
5/31/2023	Emails re service; review CCP	0.2
6/5/2023	Email to confirm POS uploaded	0.1
6/12/2023	Review/revise PAGA complaint for filing & service	0.4
6/16/2023	Review FAC answer D/L; emails	0.1
6/19/2023	Review POS for FAC for filing	0.1
7/10/2023	Emails w/ defense re scheduling call	0.1
7/13/2023	Meet & confer call w/ defense counsel	0.4
7/18/2023	Check docket re CMC; calendar	0.2
7/28/2023	Review case management orders; calendared dates & emails re service	0.3
8/24/2023	Emails w/ defense re scheduling call	0.1
8/30/2023	Review notes & email MR re call with defense	0.1
8/31/2023	Review file & status prior to call w/ defense	0.3
8/31/2023	Call w/ defense & MR	0.3
9/5/2023	Emails w/ defense & MR re scheduling call	0.1
9/15/2023	Emails w/ MR re call w/ defense counsel	0.2
9/15/2023	Review file, notes & docket to prepare for call w/ defense counsel	0.4
9/15/2023	Call w/ MR & defense counsel	0.3
9/15/2023	Emails w/ MR re defense call	0.1
10/12/2023	Emails w/ defense re data	0.1
10/20/2023	Email defense counsel re data production	0.1
11/13/2023	Review email from defense w/ production; email/call w/ MR	0.2
12/11/2023	Emails w/ defense re time & pay records; review records	0.2
12/19/2023	Call w/ MR re mediation email	0.1
12/19/2023	Review production of class member time & pay records	0.5
12/19/2023	Emails w/ MR re record review	0.2
12/19/2023	Prepare email to defense; email MR	0.4
1/2/2024	Emails w/ MR & draft email to defense/email	0.4
1/12/2024	Review email from defense; email MR	0.2
1/22/2024	Email defense re next steps; data	0.2
1/30/2024	Review email from defense counsel; email MR	0.1
3/4/2024	Prepare for meet & confer call w/ defense	0.1
3/5/2024	M&C call w/ defense counsel & MR	0.2
3/5/2024	Follow-up call & emails w/ MR re mediation	0.2
3/12/2024	Emails re mediation	0.1
3/13/2024	Emails re mediation	0.1
3/14/2024	Review mediation agreement & dates	0.1
3/22/2024	Review emails w/ client re mediation	0.1
3/27/2024	Email DRM re mediation fee & JPA	0.1

3/28/2024	Email DRM re mediation fee & JPA; call w/ DRM	0.2
3/29/2024	Email re mediation	0.1
4/4/2024	Emails & call w/ MR re mediation brief	0.1
4/5/2024	Review emails from MR re mediation brief	0.2
4/16/2024	Call w/ DRM re JPA	0.1
4/23/2024	Emails/messages re mediation brief	0.1
4/23/2024	Review email from defense re mediation data; call w/ MR	0.1
4/24/2024	Emails w/ MR re mediation brief	0.1
4/24/2024	Emails w/ DRM re demand; exposure	0.1
4/24/2024	Review final mediation brief; email MR	0.7
4/30/2024	Review & edit proposed email to client re JPA	0.1
5/1/2024	Call w/ MR re mediation	0.1
5/1/2024	Attend mediation (w/ DRM & MR) (1/2 day)	4
5/1/2024	Review mediator's proposal	0.1
5/2/2024	Emails re mediator proposal	0.3
5/2/2024	Review edits to MOU; email MR	0.4
5/3/2024	Emails re MOU	0.2
5/7/2024	Review email from defense re MOU	0.1
5/8/2024	Call w/ MR & client re settlement	0.3
5/8/2024	Emails w/ MR; review notice of settlement	0.2
5/30/2024	Review emails re admin bids	0.1
6/24/2024	Review Order w/ PA dates; review calendared deadlines	0.1
7/2/2024	Review emails re PA filing	0.1
7/8/2024	Review SA; compare to MOU & LA guidelines	0.8
7/8/2024	Draft proposed order for PA; email MR & DRM	0.7
7/8/2024	Review revised SA; call w/ MR re PA motion	0.1
7/9/2024	Call w/ MR re PA briefing; text client re update	0.1
8/5/2024	Prepare for call w/ MR & defense; call re: same	0.4
8/14/2024	Emails re settlement agreement	0.1
8/15/2024	Review PA brief & review/edit DRM dec.; cite to dec in brief	0.3
3/26/2025	Check docket; emails w/ co-counsel re continued hearing	0.2
3/26/2025	Call w/ MR re continuance; emails re notice of order	0.2
3/26/2025	Review & edit case anywhere message; email MR; messages w/ client re call	0.3
3/26/2025	Calls w/ client & MR	0.4
8/14/2025	Check docket re PA	0.1
9/9/2025	Check docket/for tentative ruling	0.1
9/10/2025	Calendar dates per minute order; email DRM re same	0.1
10/8/2025	Review for PA hearing; emails re continuance	0.5
10/28/2025	Check docket/tentative ruling	0.2
10/28/2025	Review for PA hearing; calculate final approval date	0.5
10/28/2025	Attend PA hearing	0.5
11/21/2025	Review email from administrator w/ schedule	0.1
12/18/2025	Review email from admin re notice	0.1
12/18/2025	Review notice documents & settlement form; email counsel	0.3
2/9/2026	Email re final approval dec	0.1
2/18/2026	Review & edit DRM dec; email co-counsel re same	0.4
est.	Review for FA hearing; attend FA hearing	1
	Total	25

Leeanna Carcione, Paralegal (\$175/hr)

Date	Task	Time
	review email from Cheterra; text with MKR re same; email to Cheterra;	
3/16/2023	search employer on LWDA	0.3
3/16/2023	prospective client call/interview; save notes to file and email	1.1
3/17/2023	text to Cheterra re follow up call	0.1
	review text from Cheterra; further text re time for call; calendar and email	
3/17/2023	to MKR	0.1
3/17/2023	research re prospective case	0.8
3/20/2023	review MKR notes on handbook	0.1
3/20/2023	review and respond to email from MKR	0.1
3/28/2023	text to Cheterra re follow up on case	0.1
3/28/2023	text to Cheterra re prospective case	0.1
3/28/2023	call with MKR re follow up call with Cheterra	0.1
3/28/2023	further text with Cheterra re scheduling call; add to calendar	0.1
3/28/2023	draft rep agreement; email to MKR	0.1
3/29/2023	review edits to rep agreement; accept and email to MKR	0.1
3/30/2023	email rep agreement in SR	0.1
3/30/2023	call with MKR re drafting complaint	0.3
4/3/2023	download signed rep agreement; apply DRM signature; email to MKR	0.2
4/3/2023	draft PAGA letter	2.4
4/4/2023	review edits to complaint; email draft to Young for approval	0.2
4/4/2023	draft PAGA letter; draft class action complaint	3.6
4/5/2023	review email from MKR re issue with complaint	0.1
	text to Cheterra re review; review and respond to email from her; edit in	
4/5/2023	complaint	0.2
4/5/2023	finalize PAGA letter	0.2
4/5/2023	download cc of complaint and case initiating docs	0.2
4/5/2023	file new case	0.3
	submit PAGA letter; prep for certified mail service; go to post office and	
4/5/2023	mail	0.4
4/5/2023	add PAGA coa to draft complaint	0.5
4/5/2023	finalize PAGA letter with attachment	0.5
	review local rules re new case filing; draft case initiating docs; finalize	
4/5/2023	complaint	0.8
5/23/2023	order service of complaint; review local rules	0.5
	review email re substitute service; review rules re same; email to MKR	
5/31/2023	and LRB; email to process server re POS	0.3
6/2/2023	review and respond to email from LRB re status of POS	0.1
6/2/2023	save POS to file; email to LRB and MKR	0.1
6/2/2023	file POS of summons	0.3
6/5/2023	email to MKR and LRB re rejected filing	0.1
6/5/2023	review rejection on POS of summons; re-file as two separate docs	0.2
6/6/2023	save cc of pos of summons to file; calculate and calendar def answer d/l	0.2
6/9/2023	prep FAC for filing on Monday	0.2
6/12/2023	review finalized FAC; fix bookmarks; email to LRB	0.1
6/12/2023	download cc of FAC; upload to Knox for service	0.1
6/12/2023	re-finalize FAC; email to LRB and MKR re filing	0.2
6/12/2023	further edits to FAC per LRB email; send for further review	0.3

6/12/2023	file and order SOP for FAC	0.4
6/15/2023	review email re service from Knox	0.1
6/16/2023	calculate and calendar d/l for def to answer FAC; email to MKR and LRB	0.2
6/19/2023	review POS; save to file; email re filing	0.1
6/19/2023	file POS of FAC and decl of mailing	0.2
6/26/2023	save cc of POS of FAC	0.1
7/7/2023	download case docs from docket	0.1
7/7/2023	calendar dates; email to LRB and MKR re e-service provider d/l	0.3
7/10/2023	calendar call	0.1
7/13/2023	review and respond to email to LRB re jury fees	0.1
7/13/2023	further edit to notice of paying jury fees	0.1
7/13/2023	draft notice of jury fees	0.2
7/13/2023	draft initial CMC statement; email to LRB	0.7
7/14/2023	review edits to initial cmc statement; email to LRB	0.1
7/14/2023	reserve remote appearance for LRB	0.1
7/14/2023	file and serve notice of posting jury fees; mail serve	0.4
7/18/2023	save cc of notice of posting jury fees to file	0.1
7/21/2023	review email from LRB re cmc	0.1
7/21/2023	calendar dates from amended scheduling order	0.2
7/28/2023	check docket for order; download to file; make sure dates are on calendar	0.3
7/28/2023	review e-service order; draft email to Case Anywhere	0.5
8/24/2023	calendar call	0.1
8/25/2023	calendar call	0.1
9/15/2023	save M&C summary email to file	0.1
9/22/2023	email update to Plaintiff	0.1
	review email from Plaintiff re case update; review meet and confer emails	
9/22/2023	and email MKR re same	0.3
11/13/2023	save doc production to file	0.1
12/7/2023	OCR doc production	0.3
	review email from Plaintiff re update; email MKR re proposed email to	
12/11/2023	plaintiff	0.1
12/11/2023	email to plaintiff re update	0.1
12/11/2023	match time and pay data per employee	0.5
12/14/2023	email to MKR and LRB re plaintiff text re time; further texting wih P	0.1
	review data sample production; call with MKR re same; text to plaintiff	
12/14/2023	question re same	0.8
12/19/2023	review and respond to email from MKR re discovery	0.1
	review text from Young re update; review status of case; email to MKR	
1/11/2024	and LRB re same	0.1
1/11/2024	text to plaintiff re update	0.1
1/24/2024	review and respond to text from plaintiff re update	0.1
2/7/2024	apply DRM sig on notice of association	0.1
2/9/2024	save notice of association to file	0.1
2/12/2024	text update to plaintiff	0.1
2/23/2024	calendar call	0.1
2/27/2024	review and respond to text from plaintiff re update;	0.1
3/5/2024	review email re mediation; text p with update	0.1
3/13/2024	email case info and caption to mediator; texting with MKR re same	0.2

save mediation docs to file; apply sigs on confidentiality agreement; email	
3/14/2024 to mediator's office	0.5
review email from client re mediation; draft update email; email to MKR	
3/22/2024 and LRB; send to client	0.2
3/25/2024 email plaintiff re pre mediation call; calendar	0.1
3/27/2024 follow up with DRM re mediation fee	0.1
4/23/2024 prep exhibits for mediation brief	0.8
4/30/2024 email re JPA	0.1
4/30/2024 compile signatures on JPA; email to Amber	0.1
Total	26.2

Noor Haleem, Paralegal (\$175/hr)

Date	Task	Time
5/15/2024	Review emails re settlement agreement	0.1
5/24/2024	Receive and review MOU and save on file	0.1
5/28/2024	Review Admin bids correspondence and save on file	0.2
5/29/2024	Receive, download and review Xpand pricing	0.1
6/4/2024	Save all settlement bids and email with LB on same	0.1
6/20/2024	Review email re order vacating cert deadline	0.1
	Review order re continuance of hearings, re-calendar/update calendar, save order on	
6/24/2024	file, and email to LB on same	0.3
7/3/2024	Review and save notice, confirm dates, and email to LB on same	0.1
7/10/2024	Review drafted settlement agreement and accompanying docs	0.1
	Review emails re upcoming conference with defense; confirm calenday entry on	
7/29/2024	calendar	0.2
8/12/2024	Review settlement docs and emails on same	0.2
8/14/2024	Execute settlement agreement for signature and send back to Maggie (co-counsel)	0.2
8/15/2024	Draft Dec on pre lim approval; email to LB on same	1.2
8/15/2024	Review register of actions	0.2
8/23/2024	Review declaration of Moore and save on file; email to LB on same	0.1
9/6/2024	Review register of actions, calendar new hearing date, email to LB on same	0.2
10/7/2025	Check tentative ruling and email rules to LB	0.1
10/8/2025	Calendar new hearing date, save min order on file, email with Amber on same	0.1
12/18/2025	Download and save adjustments made in the share form	0.1
3/26/2025	Receive and calendar order re continued prelim app	0.2
3/26/2025	Receive and save notice of continuance of hearing on motion for PA	0.1
9/11/2025	Confirm time on calendar, save min order on file	0.1
9/11/2025	Receive and save notice of continuance and pos, email to LB on same	0.1
	Conduct a PAGA search on email received on missing complaint, email to LB on	
9/19/2025	same	0.2
10/30/2025	Review minute order, calendar deadlines on the min order, email to LB, save on file	0.2
10/30/2025	Receive, and save order and Singer's dec, email to LB on same	0.1
11/4/2025	Review settlement agreement, apply Dave's signature, email back to Amber on same	0.1
11/13/2025	Download co-counsel's prelim approval docs, email to LB on same	0.1
11/19/2025	Save and calendar dates in the min order and prelim order, email to LB on same	0.2
12/17/2025	Review email from admin re prelim calc	0.1
12/18/2025	Receive and save PFT prelim calcs along with notice on file	0.1
12/18/2025	Receive and save settlement notice form, and email to LB on same	0.1
1/2/2026	Review weekly report by admin	0.1
2/13/2026	Draft DRM dec for final approval; compile Ex.1, emails with attorney on same	5
est	Review and check docket for tentative ruling	0.2
	Total	10.8