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Attorneys for Plaintiff Maria Reyes on behalf
of all aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

MARIA REYES, on behalf of all aggrieved
employees,

Plaintiff,

vs.

LYNEER STAFFING SOLUTIONS, LLC, a
Delaware Limited Liability Corporation; and
DOES 1-40, inclusive,

Defendants.

) Case No. CIVSB2317672

)
) **DECLARATION OF TOREY JOSEPH**
) **FAVAROTE IN SUPPORT OF**
) **PLAINTIFF'S MOTION FOR**
) **APPROVAL OF PAGA ACTION**
) **SETTLEMENT; APPOINTMENT OF**
) **SETTLEMENT ADMINISTRATOR;**
) **APPROVAL OF PAGA NOTICE;**
) **APPROVAL OF ENHANCEMENT**
) **AWARD; AND APPROVAL OF**
) **ATTORNEYS' FEES AND COSTS**

)
) Date: March 16, 2026
) Time: 8:30 a.m.
) Judge: Hon. Stephanie Tanada
) Dept.: S33

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) Action Filed: August 1, 2023
) Trial Date: None

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distributed to the Aggrieved Employees. If the Court approves the Settlement and all amounts sought, the average Aggrieved Employees' settlement share for PAGA penalties will be approximately \$65.03 ($\$130,065.00 \div$ approximately 2,000 Aggrieved Employees = \$65.03).

5. The PAGA claims being released are the PAGA claims alleged based on the facts and theories of liability set forth in the operative complaint and Plaintiff's PAGA Notice to the LWDA dated April 4, 2023, for alleged violations of Labor Code sections 201, 202, 202(a), 203, 226, 226(a), 226(b), 226.7, 510, 512, 558, 558.1, 1174, 1175, 1194, 1194.2, 1197, 1197.1, 1198 and 2802, as well as the IWC Wage Orders. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's complaint and the April 4, 2023 PAGA Notice to the LWDA that is attached to the back of the complaint.

6. The Settlement represents a fair compromise of Plaintiff's PAGA claim in view of the uncertainties, expense, time, and risks of trial, as well as the hotly contested issues of law and fact involved in this matter. For these reasons, and as demonstrated below, the Settlement warrants the Court's approval.

7. The Settlement only releases the Aggrieved Employees' PAGA claims at issue in this matter, which are held by the real party in interest, the State of California (the "State"). None of the underlying Labor Code violations are being released by the Aggrieved Employees except for Plaintiff who is releasing all of her individual claims against the Defendant once the Settlement is funded.

8. PAGA claims are brought on behalf of the State. This Settlement, if approved, will provide \$390,195.00 to the California LWDA. Plaintiff's Counsel will inform the LWDA of the Settlement immediately after the filing of this motion and provide the LWDA with a copy of Plaintiff's motion for PAGA approval and the Settlement as required under statute.

Procedural History of the Action

9. On April 4, 2023, Plaintiff sent a PAGA notice to the LWDA and Defendant describing the Labor Code violations alleged in this action and Plaintiff's theories of liability.

10. On August 1, 2023, Plaintiff filed her complaint in this Court alleging a single cause of action under PAGA for the: (i) failure to pay all overtime wages in violation of Labor Code

1 §§ 510, 1194, 1198, 558, 558.1, and the IWC Wage Orders; (ii) failure to reimburse necessary
2 business expenses in violation of Labor Code § 2802; (iii) failure to pay minimum wages for off
3 the clock work in violation of Labor Code §§ 558, 558.1, 1194, 1197, 1198 and the IWC Wage
4 Orders; (iv) failure to pay waiting time penalties in violation of Labor Code §§ 201-203; (v) failure
5 to provide accurate wage statements and keep accurate business records in violation of Labor Code
6 §§ 226 and 1174; and (vi) failure to provide meal periods and rest breaks or compensation in lieu
7 thereof in violation of Labor Code §§ 512 and 226.7.

8 **Discovery And Investigation of Facts**

9 11. My office has performed significant work litigating this case, which was settled
10 only 11 days before trial. In addition to trial preparation, my office had to bring two motions to
11 compel which resulted in sanctions, and the successful production of more than 680,000 pages of
12 documents. I also took three days of Person Most Knowledgeable (“PMK”) depositions which
13 required me to fly to New York for two days of deposition, defended Plaintiff for two days of
14 deposition, took the deposition of three of Defendant’s branch managers and the Regional Vice
15 President, interviewed dozens of Aggrieved Employees, responded to approximately 156 special
16 interrogatories, responded to multiple sets of form interrogatories, propounded more than 150
17 discovery requests, attended at least a dozen discovery related conferences with the Court, and a
18 Mandatory Settlement Conference with Judge Ortiz which finally resulted in the Settlement.

19 12. My office interviewed dozens of the Aggrieved Employees, and spent significant
20 time evaluating and performing both an in house analysis and retained an expert to review and
21 analyze the electronic time and payroll records produced. My office also had to retain a service
22 provider to manually input hundreds of thousands of paper and handwritten time entries, where the
23 Aggrieved Employees’ in/out times for the day had to be manually entered line by line for analysis.

24 **Settlement Conference with Judge Ortiz**

25 13. Just 11 days before trial, on October 9, 2025, the parties attended a MSC with Judge
26 Ortiz. Plaintiff took time off of work to personally attend that conference. Ultimately the parties
27 reached an agreement proposed by Judge Ortiz and entered into a settlement agreement that is
28 enforceable under § 664.6 on the record before the court. Attached hereto as **Exhibit B** is a true

1 and correct copy of the transcript of the settlement entered by the parties on the record at the MSC
2 before Judge Ortiz.

3 **Post MSC Effort For Updated Data And Long Form Agreement**

4 14. As a part of the Settlement that was entered on the record with Judge Ortiz,
5 Defendant was required to provide PAGA counsel with an updated list of the number of aggrieved
6 employees and the number of pay periods that they worked during the settlement period by
7 November 9, 2025.

8 15. To date, Defendant has not provided that information despite repeated requests for it
9 on November 12, 2025, November 26, 2025, December 12, 2025, January 2, 2026 and January 12,
10 2026. Defendant Counsel has also failed to provide comments to the draft longform agreement that
11 I sent to her on November 26, 2025.

12 16. To avoid any further risk to the Settlement, Plaintiff has moved to approve the
13 Settlement as agreed to on the record with Judge Ortiz and secure judgment based on the
14 Settlement entered into the record on October 9, 2025.

15 17. I have also requested information from Defendant's counsel about any related cases
16 since Defendant did not file a notice of related case in this case as far as we can see from the
17 record. To date, my office has not received that information from Defendant either.

18 **Principal Terms of the Settlement**

19 18. Defendant will pay \$925,000.00 (the "Total Settlement Amount") in settlement of
20 the action on a PAGA representative basis for approximately 2,000 aggrieved employees. The
21 Total Settlement Amount will cover: (i) the payment to the LWDA for its share of civil penalties
22 pursuant to PAGA, Cal. Lab. Code § 2699(i); (ii) the Settlement shares to the Aggrieved
23 Employees; (iii) Plaintiff's proposed enhancement award (requested to be \$15,000.00);
24 (iv) Plaintiff's Counsels' proposed reasonable fees (requested to be 35%, or \$323,750.00) and
25 litigation costs up to (\$53,000.00); and (v) the cost of settlement administration (estimated to be
26 approximately \$12,990.00).

27 19. After deduction for Plaintiff's enhancement award, Plaintiff's Counsels' attorneys'
28 fees and expenses, and the settlement administration costs, the resulting \$520,260.00 Net

1 Settlement Amount will be paid 75% to the LWDA (\$390,195.00) and 25% to the Aggrieved
2 Employees (\$130,065.00), pursuant to Labor Code section 2699(i).

3 20. 100% of the Settlement shares will be reported using IRS Form 1099s, since all
4 funds are for the settlement of a claim for civil penalties. Each Aggrieved Employee's Settlement
5 share will be calculated based on the ratio of his or her pay periods worked for the Defendant on
6 the 23 client accounts at issue, to all of the Aggrieved Employees' pay periods worked for the
7 Defendant on the 23 client accounts at issue during the PAGA Settlement Period. Based on the data
8 provided to Plaintiff in discovery, Plaintiff extrapolated out from where the data ended in July of
9 2024, and estimates that there are approximately 2,000 Aggrieved Employees that worked
10 approximately 19,000 pay periods during the Covered Period. Attached as **Exhibit C** is the list of
11 the 23 client accounts at issue from page 7 of our expert's report that is noted in the Settlement.

12 21. Based on that number, if the Court approves the Settlement and awards the amounts
13 sought for attorneys' fees and costs, Plaintiff's requested enhancement award, and settlement
14 administration cost, the average Aggrieved Employee's settlement share after the 75% distribution
15 to the LWDA will be approximately \$65.03, the minimum payment for just one pay period worked
16 is expected to be \$6.84, and the maximum payment for an Aggrieved Employee who worked the
17 entire Settlement Period is expected to be approximately \$902.88. Attached as **Exhibit D** is the
18 proposed settlement notice that will be mailed with the settlement check in both English and
19 Spanish.

20 22. Within 90 days after the approval by the Court, Defendant is required to fund the
21 Settlement. Plaintiff is still waiting for the Aggrieved Employee's updated information, which was
22 due on November 9, 2025 under the Settlement. Defendant's counsel has represented that
23 Defendant is still working on producing that information as people were away on "vacation."

24 **Potential PAGA Penalties Analysis**

25 23. The data provided and Plaintiff's expert makes it clear that: 1) the total violation
26 rate in this case is not 100% for the Aggrieved Employees; and 2) that although all of the
27 Aggrieved Employees were not paid for all of the time spent working on the clock (i.e., had their
28 time rounded or were underpaid) it was only to their detriment 60.9% of the time for a total of

1 10,487 unfavorable pay periods, not 100%, and the extent to which the underpayment affected
2 employees varied widely. Additionally, the California Supreme Court in Camp v. Home Depot
3 U.S.A., 523 P.3d 391 (Cal. 2023) is set to decide whether rounding is legal in California at all.
4 There is a risk that the California Supreme Court will not rule favorably in that case or rule that its
5 decision is not retroactive, leaving in place an argument as to whether Defendant's rounding policy
6 was allowable under See's Candy Shops, Inc. v. Superior Ct., 210 Cal. App. 4th 889 (2012). This is
7 why for settlement we discounted the waiting time penalties claim for purposes of PAGA for the
8 lack of "willfulness" "The 10,487 pay periods with unfavorable rounding or not paying for all work
9 time, equate to approximately \$1,048,700.00 in potential PAGA penalties.

10 24. IWC Wage Order No. 4 (Cal. Code Regs., tit. 8, § 1104) requires California
11 employers to keep: "Time records showing when the employee begins and ends each work period,
12 meal periods, split shift intervals and total daily hours worked." Labor Code §§ 1198 and 1199
13 requires employers to follow the IWC Wage Orders, and makes it a Labor Code violation to fail to
14 comply with the IWC Wage Orders. Labor Code § 1174 requires that employers keep accurate
15 payroll records. Defendant has failed to keep any record of when many of its employees started and
16 ended their meal periods and in many cases when they started and ended work for the day. Instead,
17 Defendant allows its clients to submit summaries of hours which often only include the total
18 number of hours worked. There are thousands of paper time records which show these record
19 keeping violations, resulting in at least 8,750 pay periods² with violations. At a rate of \$100 per pay
20 period this results in \$875,000.00 in potential PAGA penalties.

21 25. Defendant's failure to pay for all time worked, including rounding, as shown in the
22 electronic time and payroll information also results in wage statements that did not accurately
23 record the hours worked at each rate of pay, or the correct rates of pay. This information is required
24 by Labor Code §§ 226(a). This derivative claim could result in up to an additional \$1,544,700.00 in
25 derivative PAGA penalties. (81.3% of the pay periods had unfavorable rounding at least one time
26 so that is an additional 15,447 pay periods x \$100 = \$1,544,700.)

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28 ² Some of these records contain multiple individuals per page.

1 26. The review of the electronic time records also showed approximately 4,650 pay
2 periods with a potential meal period violation for which our expert calculated an additional
3 \$456,000.00 in potential PAGA penalties. As far as rest breaks were concerned, many Aggrieved
4 Employees stated that they got breaks, although third rest breaks were an issue if they worked over
5 10 hours. As such, we used 1 violation per month which is approximately \$475,000.00 in PAGA
6 penalties. For the expense reimbursement claim, since the cellular usage and mileage were
7 minimal, we also used 1 violation per month which equates to \$475,000.00 in potential PAGA
8 penalties. Based on the exposure noted above, which in aggregate total \$4,874,400,³ the
9 \$925,000.00 settlement of approximately 19% of the overall general exposure is reasonable.

10 27. Defendant contends that pursuant to California Labor Code section 2699(e)(2), even
11 if liability were found, penalties properly would be substantially reduced. Carrington v. Starbucks
12 Corp., 30 Cal.App.5th 504, 520 (2018) (Approving a deduction of PAGA penalties to \$5.00 per
13 pay period.)

14 **Fair and Reasonable Settlement**

15 28. This case was settled through arms-length negotiation. Though cordial and
16 professional, the settlement negotiations were adversarial and non-collusive in nature. The
17 Settlement reached is the product of substantial effort by the parties and their counsel after almost
18 2.5 years of very hard-fought litigation. While Plaintiff believes that she has a high probability of
19 ultimately prevailing on most of the claims in this action, she also recognizes the inherent risks of
20 litigation and understands the benefit to the State and the Aggrieved Employees in receiving the
21 Settlement rather than risking a potential unfavorable decision at trial, appeal, on the penalties
22 awarded, or Defendant's ability to pay as a temp agency.

23 **A Representative Plaintiff Enhancement Is Warranted and Reasonable**

24 29. Plaintiff's requested enhancement award of \$15,000.00 in exchange for her service
25 to the State and other Aggrieved Employees is reasonable in this case. Plaintiff has actively
26 participated in this litigation to win the Settlement for the Aggrieved Employees at great risk to
27

28 ³ \$1,048,700.00 + \$875,000.00 + \$1,544,700.00 + \$456,000.00 + \$475,000.00 +
\$475,000.00 = \$4,874,400.00.

1 herself. Plaintiff went above and beyond to miss work and spent more than 80 hours in service to
2 the State and the Aggrieved Employees. Plaintiff also worked closely with Plaintiff's Counsel,
3 discussed the facts of the case multiple times, searched for documents and reviewed her deposition
4 transcripts, discovery responses and documents produced. Plaintiff also missed work to prepare for
5 and sit for two full days of deposition. She also on short notice took another day off of work to
6 attend the MSC in person with me. Plaintiff has provided material support to this case, and she has
7 risked (and potentially faced) reputational harm as well as financial harm. Plaintiff will continue to
8 bear the risks associated with this litigation and face the risk of being blacklisted, especially as all
9 PAGA documents are publicly available for free online on the LWDA's PAGA website. In
10 appreciation of the personal risks, the time spent on this litigation, and the result achieved,
11 Plaintiff's requested enhancement award of \$15,000.00 is more than reasonable. Plaintiff's
12 individual PAGA payment is estimated to be approximately \$328.32.

13 30. Attached hereto as **Exhibit E** is a true and correct copy of Declaration of Maria
14 Reyes in support of this motion.

15 **Class Counsels' Request for Attorneys' Fees and Costs**

16 31. My office has, after extensive litigation, secured a Settlement that provides value to
17 the State and the Aggrieved Employees and now only seeks fees that are in line with the fair
18 market value of the work by requesting that the Court approve less than half of our Lodestar. This
19 means that my office is seeking fees which amount to far less than what we have spent litigating
20 this case just short of trial.

21 32. The fee total for Gleason & Favarote LLP ("G&F") for the litigation of this action is
22 \$691,232.50. The hours my firm expended litigating this action total over 1,049. The costs incurred
23 by G&F in prosecuting this action is \$53,048.62. Attached as **Exhibit F** is the itemized statement
24 for G&F for this case.

25 33. My billing rate was \$750.00 per hour for this wage and hour PAGA action through
26 December 31, 2024, and \$800 per hour thereafter. I have been practicing in this area of the law for
27 over 27 years. On May 4, 2021, I was approved at \$750 per hour in the San Bernardino Superior
28 Court in Stokes et. al. v. Exact Staff, Inc., Case No. CIVDS1924628, a PAGA case. On May 26,

1 2021, I was approved at \$750 per hour in the San Bernardino County Superior Court in Arthur
2 Barnes et. al. v. Target Corp., Lead Case No. CIVDS2007761 (consolidated with Case Nos.
3 CIVDS2012750 and CIVDS2004578), which was a class action. On October 4, 2022, I was
4 approved at \$750 per hour in the San Bernardino Superior Court in Jing Dong Zang v. CA Fan
5 Tuan Inc., Case No. CIVSB2026778, a PAGA action. On February 20, 2025, I was approved at
6 \$750 per hour in the San Bernardino Superior Court in Lee, Ronghui v. HungryPanda US Inc., Case
7 No. CIVSB2126633, a PAGA action. On March 12, 2025, I was approved at \$750 per hour in the
8 San Bernardino Superior Court in Angel Perez v. Hilton Manor, LLC, Case No. CIVSB2220728, a
9 class action. On May 9, 2025, I was approved at \$800 per hour in the Orange County Superior
10 Court in Amara O'Neill v. Robinson Pharama Inc., Case No. 30-2020-01176039-CU-OE-CJC, a
11 class and PAGA action. My firm charges \$350 an hour for the associates on this case. There are no
12 fee sharing agreements for this case.

13 34. Class Counsels' Lodestar totals \$691,232.50. The total fees requested are
14 \$323,750.00, approximately 47% of the fees incurred in litigating this action.

15 I declare under penalty of perjury under the laws of the United States and the State of
16 California that the foregoing is true and correct.

17 Executed on January 23, 2026 at Long Beach, California.

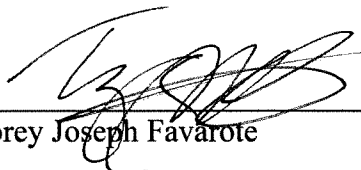
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EXHIBIT A

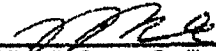
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Attorneys for Plaintiff Maria Reyes on behalf
of all aggrieved employees

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO

AUG 01 2023


BY: Michelle Gomez-Casillas, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

MARIA REYES, on behalf of all aggrieved
employees,

Plaintiff,

vs.

LYNEER STAFFING SOLUTIONS, LLC, a
Delaware Limited Liability Corporation; and
DOES 1-40, inclusive,

Defendants.

Case No.

CIV SB 23 17672

PAGA COMPLAINT FOR PENALTIES

1. VIOLATION OF THE PRIVATE
ATTORNEYS GENERAL ACT, LABOR
CODE §§ 2698 ET SEQ. ("PAGA").

DEMAND FOR TRIAL BY JURY

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1 Representative Plaintiff, Maria Reyes (herein referred to as "Plaintiff" or "Reyes"), has
2 brought this action against defendant Lyneer Staffing Solutions, LLC (hereinafter "Lyneer"), and
3 DOES 1-40 (hereafter collectively referred to as "Defendant"). Plaintiff is informed and believes,
4 and on that basis alleges as follows:

5 **PARTIES AND JURISDICTION**

6 1. Plaintiff Maria Reyes was at all times relevant to this action, an employee of
7 Defendant as a payroll processor in California and throughout Southern California.

8 2. Defendant Lyneer is a Delaware limited liability corporation registered, qualified,
9 and doing business in the State of California, with its principal place of business in Southern
10 California.

11 3. Jurisdiction and venue are also proper in this Court because many of the claims
12 alleged herein arose in San Bernardino County and Defendant does business throughout San
13 Bernardino County and the state of California, in each case, at the times relevant herein. Pursuant
14 to California Code of Civil Procedure section 395(a), venue is proper in this County because the
15 majority of the harm to the aggrieved employees occurred in this County.

16 4. Plaintiff is ignorant of the true names and capacities of the defendants sued herein as
17 DOES 1-40. Defendants DOES 1-40 are sued herein under fictitious names pursuant to California
18 Code of Civil Procedure section 474. Plaintiff is informed and believes, and on that basis alleges,
19 that each defendant sued under such fictitious names is in some manner responsible for the wrongs
20 and damages as alleged herein as a joint employer of the aggrieved employees. Plaintiff does not
21 at this time know the true names or capacities of said defendants but prays that the same may be
22 inserted herein when ascertained.

23 5. At all times relevant, each and every Defendant was an agent and/or employee of
24 each and every other defendant. In doing the things alleged in the causes of action stated herein,
25 each and every Defendant was acting within the course and scope of this agency or employment,
26 and was acting with the consent, permission, and authorization of each remaining Defendant. All
27 actions of each Defendant as alleged herein were ratified and approved by every other Defendant or
28 their officers or managing agents.

1 6. Plaintiff is informed and believes and thereon alleges that in performing the
2 unlawful acts alleged herein, each Defendant was the agent, employee and representative of each of
3 the remaining Defendants, and in doing the unlawful things alleged was acting within the course,
4 purpose, scope and authority of such agency, employment or representation.

5 7. Each act was done with malice, oppression, and was despicable conduct entitling
6 Plaintiff to punitive and exemplary damages.

7 **STATEMENT OF FACTS**

8 8. This is a PAGA action pursuant to California Code of Civil Procedure section 382,
9 on behalf of all aggrieved employees who worked for Defendant in California as a misclassified
10 employee and/or an hourly non-exempt employee for: (i) failure to pay all overtime wages in
11 violation of Labor Code §§ 510, 1194, 1198, 558, 558.1, and the IWC Wage Orders; (ii) failure to
12 reimburse necessary business expenses in violation of Labor Code § 2802; (iii) failure to pay
13 minimum wages for off the clock work in violation of Labor Code §§ 558, 558.1, 1194, 1197, 1198
14 and the IWC Wage Orders; (iv) failure to pay waiting time penalties in violation of Labor Code §§
15 201-203; (v) failure to provide accurate wage statements and keep accurate business records in
16 violation of Labor Code §§ 226 and 1174; (vi) failure to provide meal periods and rest breaks or
17 compensation in lieu thereof in violation of Labor Code §§ 512 and 226.7; and (vii) unlawful
18 business practices in violation of Bus. & Prof. Code section 17200 *et seq.*

19 9. For at least one year and 65 days prior to the filing of this action through the present
20 Defendant has had a consistent policy and practice of failing to pay its employees minimum wages
21 for all work performed. Among other unlawful practices, Defendant has a pattern and practice of
22 misclassifying its employees and paying below minimum wage for all hours worked for hourly
23 non-exempt employees. Furthermore, Defendant is fully aware of the hours its employees work as
24 it requires all employees regardless of classification to clock in and out and enter a description of
25 their work on their timecards. Defendant also has a pattern and practice of not paying for all work
26 performed by its non-exempt employees, including but not limited to, deliberately withholding
27 payment conditioned on various pieces of paperwork, the completion of which is also not
28 compensated, and requiring employees to drive to Defendant's offices to retrieve their paychecks

1 without compensation.

2 10. For at least one year and 65 days prior to the filing of this action through the present
3 Defendant has had a consistent policy and practice of failing to pay its employees, overtime wages.
4 Defendant has a pattern and practice of not paying overtime for all hours worked in excess of
5 8 hours in a workday and does not pay double time for all hours worked in excess of 12 hours in a
6 workday. Defendant has a pattern and practice of not paying overtime for all hours worked on the
7 seventh day of each workweek.

8 11. For at least one year and 65 days prior to the filing of this action through the present
9 Defendant has had a consistent policy and practice of requiring its employees to accept and
10 respond to work related calls and texts on their personal cellular telephones. Plaintiff and the other
11 aggrieved employees have at all times relevant to this complaint been required to respond to work
12 related calls, texts, and emails on their personal cellular telephones at all times, even during hours
13 when they are not on the clock. Defendant also has a consistent policy and practice of not
14 reimbursing Plaintiff and the other aggrieved employees for home office equipment, for the full
15 expense associated with the use of their personal vehicles for work, and for the purchase of other
16 equipment and miscellaneous supplies necessary to their job duties but not provided by Defendant.

17 12. For at least one year and 65 days prior to the filing of this action through the present
18 Defendant has had a consistent policy and practice of not providing Plaintiff and the other
19 aggrieved employees with legally adequate meal periods and rest breaks. Defendant does not pay
20 premiums for non-compliant meal periods and rest breaks. If any premiums or bonuses were ever
21 paid, Defendant did not pay any premiums at the aggrieved employees' correct regular rate of
22 pay/compensation as it did not include all forms of compensation into the calculation. Plaintiff and
23 the other aggrieved employees were not provided with duty free meal periods and rest breaks as
24 they are always on call for Defendant and its supervisors. Defendant does not provide second meal
25 periods after more than 10 hours of work in a workday and does not provide a second or third paid
26 rest break for shifts over 6 hours as required by California law.

27 13. Defendant's failure to pay minimum wages, overtime, meal period premiums, rest
28 break premiums, and practice of intentionally withholding payment at termination has resulted in

1 the receipt of inaccurate wage statements which did not list the correct amount of hours worked,
2 wages earned, and/or the rates worked at for the pay period. This failure to pay for all work
3 performed has also resulted in a failure to pay all wages at termination.

4 14. Defendant is a nationwide staffing company that has numerous offices throughout
5 California. Defendant employs hundreds of employees, often jointly with other companies, in
6 California and generates millions of dollars in revenue each year. Defendant is both a statutory
7 and common law joint employer of the aggrieved employees Lyneer provides to other companies
8 (DOES 1-40), who are yet unknown defendants. Furthermore, Defendant Lyneer was a "Labor
9 contractor" within the meaning of Labor Code § 2810.3 as it is an entity that "supplies, either with
10 or without a contract, a client employer with workers to perform labor within the client employer's
11 usual course of business." Defendant Lyneer's clients are also "client employers" within in the
12 meaning of Labor Code § 2810.3 who share "all civil legal responsibility and civil liability" with
13 Defendant Lyneer.

14 15. Plaintiff has noticed both the California Labor and Workforce Development Agency
15 ("LWDA") and Defendant of these violations, along with the facts and theories in support, in the
16 PAGA notice letter attached hereto as **Exhibit A**, which is incorporated by reference.

17 CAUSES OF ACTION

18 **FIRST CAUSE OF ACTION**

19 **VIOLATION OF LABOR CODE SECTION 2698 ET. SEQ. PAGA**

20 **(Plaintiff against Defendant and Does 1 through 20, Inclusive)**

21 16. Plaintiff refers to and incorporates all of the paragraphs of this Complaint as though
22 fully set forth herein.

23 17. As set forth in detail in the paragraphs above and in Plaintiff's complaint to the
24 California Labor and Workforce Development Agency ("LWDA"), attached hereto as **Exhibit "A"**
25 and incorporated for all purposes to these allegations, for the one (1) year period preceding the
26 filing of the PAGA notice letter with the LWDA on April 4, 2023, Defendant had a uniform policy
27 and practice of not paying minimum wage or overtime to Plaintiff and the aggrieved employees,
28 failed to reimburse Plaintiff and the aggrieved employees for incurred and necessary business

1 expenses, failed to pay straight and minimum wages for hours worked by the aggrieved employees,
2 failed to provide the aggrieved employees with lawful itemized wage statements, failed to remit all
3 wages owed to Plaintiff and the aggrieved employees at the time of termination, and failed to
4 provide Plaintiff and the aggrieved employees with lawful, statutory, meal and rest periods all in
5 violation of the California Wage Orders, the Cal. Code of Regulations (CCR) §§11040, 11090,
6 and California Labor Code §§ 201, 202, 203, 204, 226(a), 226.7, 510, 512, 515, 558, 1174, 1194,
7 1197, 1197.1, 1198, 1199, and 2802.

8 18. California Labor Code section 2698 *et seq.* provides employees with a private right
9 of action to remedy an employer's failure to comply with Labor Code sections designated in Labor
10 Code section 2699.5. Labor Code sections 201, 202, 203, 204, 226(a), 226.7, 510, 512, 515, 558,
11 1174, 1194, 1197, 1197.1, 1198, 1199, and 2802, all of which Defendant has violated as alleged
12 above and as stated in detail in **Exhibit "A"** which is incorporated by reference. These sections are
13 provided for under Labor Code section 2699.5. Penalties for violations under Labor Code section
14 2699(f)(2) are one hundred dollars (\$100.00) for each aggrieved employee per pay period for the
15 initial violation, and two hundred dollars (\$200.00) per subsequent violation for each aggrieved
16 employee per pay period.

17 19. Plaintiff has exhausted the administrative prerequisites to file a claim under Labor
18 Code section 2698 *et seq.* by first sending notice to the California Labor Workforce and
19 Development Agency ("LWDA") online filing system on April 4, 2023, along with a certified
20 copy to Defendant. (Attached hereto as **Exhibit "A"**). It has been over 65 days since the
21 exhaustion and Plaintiff has not received confirmation from the LWDA that it will not investigate
22 the complaint within the time limits set forth in Labor Code section 2699.3(a)(2).

23 **PRAYER FOR RELIEF**

24 WHEREFORE, Plaintiff prays for judgment and penalties against Defendant, and each of
25 them, as follows:

26 1. For all statutory penalties available under Labor Code section 2698 *et seq.* and costs
27 of suit incurred herein and reasonable attorneys' fees pursuant to PAGA;

28 2. For injunctive relief;

3. For costs of suit incurred herein and reasonable attorneys' fees pursuant to the referenced statutes; and

4. For such other and further relief as the Court may deem just and proper.

Dated: August 1, 2023

GLEASON & FAVAROTE LLP
TOREY JOSEPH FAVAROTE

By:

Torey Joseph Favarote

Attorneys for Plaintiff Maria Reyes on
behalf of all aggrieved employees

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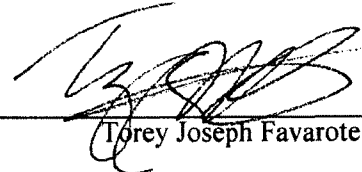
DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury.

Dated: August 1, 2023

GLEASON & FAVAROTE LLP
TOREY JOSEPH FAVAROTE

By: _____



Torey Joseph Favarote

Attorneys for Plaintiff Maria Reyes on
behalf of all aggrieved employees

EXHIBIT A



GLEASON & FAVAROTE LLP

213.452.0510 Main
213.452.0514 Fax

4014 Long Beach Blvd., Suite 300
Long Beach, California 90807

gleasonfavarote.com

April 4, 2023

VIA ELECTRONIC SUBMISSION

Stewart Knox
Secretary
California Labor & Workforce Development Agency
800 Capital Mall, Suite 5000 (MIC-55)
Sacramento, CA 95814

Re: **Maria Reyes v. Lyneer Staffing Solutions LLC**
California Labor Code section 2698, *et seq.* violations

Dear Mr. Knox:

I am writing on behalf of aggrieved employee Maria Reyes ("Reyes"). This notice is being made to the Labor & Workforce Development Agency ("LWDA") pursuant to the requirement of Labor Code section 2698 *et al.* that Reyes, and other aggrieved employees, who were employed by Lyneer Staffing Solutions LLC as well as Does 1-10 who may also operate as part of Lyneer Staffing Solutions LLC but are as of yet unidentified (herein all of the above are collectively referred to as "Lyneer" or the "Company"), as non-exempt hourly employees in California and as misclassified managers (the "Aggrieved Employees"). Lyneer employed Reyes as a payroll processor since 2012 and started her as an hourly employee but then reclassified her as an exempt employee without any change in her job duties other than an increase in the amount of work. Lyneer is a joint employer with its customers when it provides temporary staffing. As such, Lyneer's clients are obligated to pay any penalties or damages that Lyneer is unable to pay under Labor Code section 2810.3.

Reyes, and each of the Aggrieved Employees described above, suffered from one or more of the following Labor Code violations by their current or former employer Lyneer. Reyes and the other Aggrieved Employees' employment with Lyneer was governed by the California Wage Orders, and California Labor Code sections 201, 202, 203, 226, 226.7, 510, 512, 558, 558.1, 1174, 1175, 1194, 1194.2, 1197, 1197.1, 1198 and 2802.

Reyes originally worked for Lyneer as a non-exempt hourly employee in southern California, but in 2016 was reclassified as an exempt employee without any change in her job responsibilities. Reyes does not manage any other employees, does not exercise any discretion in her job, and spent the vast majority of her time doing non-exempt work such as printing checks, sorting checks, stuffing checks into envelopes, inputting payroll, and driving to deliver checks to Lyneer offices in her personal vehicle for which she was not fully reimbursed in violation of Labor Code section 2802.

Reyes and the other Aggrieved Employees were not paid overtime for all time worked after 8 hours of work in a workday/shift, 7 workdays in a workweek, and/or 40 hours worked in a workweek. Reyes and the other Aggrieved Employees are instructed to clock in and out and to enter a description of their work performed each time they use the timeclock. Reyes and the other Aggrieved Employees are often required to work off the clock on weekends and after hours and sometimes seven days a week but are paid only at their regular rate of pay without overtime. In addition to the above, Reyes and the other Aggrieved Employees are also not paid for all of the time spent working for Lyneer and for all of the time that they are under its control. Additionally, Reyes and the other Aggrieved Employees are often paid below minimum wage when all hours worked are considered.

Reyes and the other Aggrieved Employees also were not provided with legally adequate meal periods and rest breaks, and Lyneer does not pay premiums for non-compliant/unprovided meal periods and rest breaks. If any premiums or bonuses were ever paid, Lyneer did not pay any premiums at the Aggrieved Employees' correct regular rate of pay/compensation. Reyes and the other Aggrieved Employees were not provided with duty free meal periods and rest breaks as they are always on call for Lyneer clients and supervisors. Lyneer keeps some records of when work periods and meal periods begin and end and but still does not pay premiums for late, short or interrupted meal periods and/or rest breaks. Lyneer does not provide second meal periods after more than 10 hours of work in a workday, and does not provide second or third paid rest breaks for shifts over 8 hours as required by California law. These policies are in violation of Labor Code §§ 226.7, 512, 558, 1198, and the IWC Wage Orders.

Reyes is informed and believes that it is Lyneer's uniform practice and procedure to not reimburse its employees for the use of their personal cellular devices and associated cellular service and/or data service plans which they use in the performance of their job in communicating with clients and managers, for the purchase and upkeep of their home office equipment, for the full expense associated with the use of their personal vehicles for work, and for the purchase of other equipment and miscellaneous supplies necessary to their job duties but not provided by Lyneer. Reyes and the other Aggrieved Employees are expected to use their personal cellular telephones to communicate with Lyneer management/staff as part of their job duties both during regular work hours and after work.

Reyes is also informed and believes that Lyneer's above mentioned uniform policies and procedures are unlawful and have further caused Lyneer to intentionally provide incorrect wages statements which do not accurately display all of the information required by Labor Code § 226(a), including but not limited to not accurately providing the gross wages earned, total hours worked by the employees, net wages earned and all hourly rates in effect in the pay period and the corresponding correct number of hours worked at each hourly rate by the employee. This has also resulted in a failure to keep accurate employment records under Labor Code §§ 226(b), 1174, and 1175, which Lyneer already fails to keep for the time required by statute. Lyneer additionally has a policy of not paying all wages at termination by waiting several days or until the next regularly scheduled payday to pay termination wages and not paying all wages at termination. Lyneer's failure to pay all earned overtime and premium wages also results in a

Stewart Knox, Secretary
California Labor & Workforce Development Agency
Maria Reyes v. Lyneer Staffing Solutions LLC
April 4, 2023
Page 3 of 3

failure to pay all wages at termination. All of these policies and practices are in violation of Labor Code sections 201, 202(a), 203, 226(a) and (b), 226.7, 510, 512, 558, 558.1, 1174, 1175, 1194, 1194.2, 1197, 1197.1, 1198 and 2802, as well as the relevant IWC Wage Orders.

Sincerely,

GLEASON & FAVAROTE LLP

A handwritten signature in black ink, appearing to read 'Torey Favarote', is written over a horizontal line.

Torey Joseph Favarote

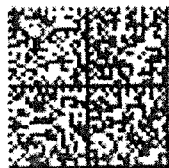
TJF/dd

cc Lyneer Staffing Solutions LLC, c/o Incorp Services, Inc. (C2294569), agent for service of process



GLEASON & FAVAROTE LLP

4014 Long Beach Blvd., Suite 300
Long Beach, CA 90807



US POSTAGE
\$008.10
First-Class Mail
04/04/2023
ZIP 90807
0348 6081823190

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL®



Lyneer Staffing Solutions LLC
c/o Incorp Services, Inc. (C2294569), agent for
service of process
3773 Howard Hughes Parkway Ste 500S
Las Vegas, NV 89169

7020 2450 0001 4117 9304
7020 2450 0001 4117 9304

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®.	
OFFICIAL USE	
Certified Mail Fee \$	
Extra Services & Fees (check box, add fee as appropriate)	
☐ Return Receipt (hardcopy)	\$
☐ Return Receipt (electronic)	\$
☐ Certified Mail Restricted Delivery	\$
☐ Adult Signature Required	\$
☐ Adult Signature Restricted Delivery	\$
Postage \$	
Total Postage \$	
Sent To	
Street and A	
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Lyneer Staffing Solutions LLC c/o Incorp Services, Inc. (C2294569), agent for service of process 3773 Howard Hughes Pkwy Ste 500S Las Vegas, NV 89169	
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	

Postmark
Here

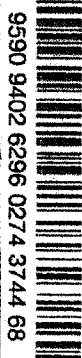
SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Lyneer Staffing Solutions LLC
c/o Incorp Services, Inc. (C2294569),
agent for service of process
3773 Howard Hughes Pkwy Ste 500S
Las Vegas, NV 89169



9590 9402 6296 0274 3744 68

2. Article Number (Transfer from carrier label)

7020 2450 0001 4117 9304

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? If YES, enter delivery address below:

☐ Yes
☐ No

3. Service Type

- | | |
|--|---|
| ☐ Adult Signature Restricted Delivery | ☐ Priority Mail Express® |
| ☐ Registered Mail | ☐ Registered Mail Restricted Delivery |
| ☐ Certified Mail | ☐ Signature Confirmation™ |
| ☐ Certified Mail Restricted Delivery | ☐ Signature Confirmation Restricted Delivery |
| ☐ Collect on Delivery | |
| ☐ Collect on Delivery Restricted Delivery | |
| ☐ Insured Mail | |
| ☐ Insured Mail Restricted Delivery (over \$500) | |

Domestic Return Receipt

Certified Mail service provides the following 1

- A receipt (this portion of the Certified Mail label).
 - A unique identifier for your mailpiece.
 - Electronic verification of delivery or attempted delivery.
 - A record of delivery (including the recipient's signature) that is retained by the Postal Service™ for a specified period.
- Important Reminders:**
- You may purchase Certified Mail service with First-Class Mail®, First-Class Package Service®, or Priority Mail® service.
 - Certified Mail service is *not* available for international mail.
 - Insurance coverage is *not* available for purchase with Certified Mail service. However, the purchase of Certified Mail service does not change the insurance coverage automatically included with certain Priority Mail items.
 - For an additional fee, and with a proper endorsement on the mailpiece, you may request the following services:
 - Return receipt service, which provides a record of delivery (including the recipient's signature). You can request a hardcopy return receipt or an electronic version. For a hardcopy return receipt, complete PS Form 3811, *Domestic Return Receipt*; attach PS Form 3811 to your mailpiece;
 - Restricted delivery service, which provides delivery to the addressee's address only (not available at retail).
 - Adult signature restriction, which requires the addressee to sign for the mailpiece (not available at retail).
- IMPORTANT: Save this 1**

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Lyneer Staffing Solutions LLC
c/o Incomp Services, Inc. (C2294569),
agent for service of process
3773 Howard Hughes Pkwy Ste 500S
Las Vegas, NV 89169



9590 9402 6296 0274 3744 68

2. Article Number (Transfer from carrier label)

7020 2450 0001 4117 9304

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
- ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

EXHIBIT B

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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO
BEFORE THE HONORABLE JOSEPH T. ORTIZ, JUDGE
DEPARTMENT S17-SBJC

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COMPLEX-PAGA - REYES,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO. CIVSB2317672
	)	
LYNEER STAFFING SOLUTIONS,	)	
LLC, ET AL,	)	
	)	
Defendants.	)	

TRANSCRIPT OF PROCEEDINGS
MANDATORY SETTLEMENT CONFERENCE
VOLUME 1 OF 1 - PAGES 1 - 8
OCTOBER 9, 2025

APPEARANCES:

FOR THE PLAINTIFF:	TOREY J. FAVAROTE, ESQ. Gleason & Favarote LLP 3646 Long Beach Boulevard Suite 203 Long Beach, CA 90807
FOR THE DEFENDANTS:	STACEY M. COOPER, ESQ. Stacey Cooper Law, PC 888 Prospect Street Suite 200 La Jolla, CA 92037
TRANSCRIBED BY:	LESLIE HINMAN

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SESSIONS

PAGE

OCTOBER 9, 2025

AFTERNOON SESSION

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1 SAN BERNARDINO, CALIFORNIA - THURSDAY, 9 OCTOBER 2025

2 AFTERNOON SESSION

3 (PROCEEDINGS IN OPEN COURT)

4 (Call to order at 4:13 p.m.)

5 THE COURT: Let's go ahead.

6 THE CLERK: Uh-huh.

7 THE COURT: All right, let's call to order No. 9 on
8 my calendar is Reyes versus Lyneer Staffing Solutions. Let me
9 get attorneys and their clients if you'll make your
10 appearances. Let's start with Plaintiff's counsel, please.

11 MR. FAVAROTE: Good afternoon, Your Honor. Torey
12 Favarote for Plaintiff and the aggrieved employees.

13 THE COURT: And I'm going to note that Mr. Reyes is
14 here, and if you'll state your name, ma'am.

15 THE PLAINTIFF: Maria Reyes.

16 THE COURT: And then, Defense counsel?

17 MS. COOPER: Stacey Cooper, on behalf of Lyneer
18 Staffing Solutions, LLC.

19 THE COURT: And you have a client who's appearing
20 remotely?

21 MS. COOPER: I do. Ms. Suzette Berrios, is
22 appearing via Zoom.

23 THE COURT: And I'm going to note, we're recording
24 with what we call the FTR -- the For The Record audio
25 recording. We don't provide court attendant or court
26 recorders. I'm going to find good cause for the purposes of
27 enforcing a settlement under 664.6 for us to audio record. So
28 let's go ahead. I'd asked the parties -- this was a mandatory



1 settlement conference -- I'd asked the parties to prepare a
2 statement and then, review it, and make sure both parties are
3 in agreement. Have we done that?

4 MS. COOPER: Yes, we have.

5 MR. FAVAROTE: Yes, Your Honor.

6 THE COURT: And who will be reading it into the
7 record?

8 MR. FAVAROTE: I will, Your Honor.

9 THE COURT: When you're ready, please go ahead.

10 MR. FAVAROTE: Thank you, Your Honor. So this is
11 the settlement of Reyes vs. Lyneer Staffing Solutions. The
12 settlement covers Plaintiff and all temporary employees of
13 Defendant that worked at the 23 clients identified on page 7
14 of Plaintiff's expert report for the period of April 4, 2022
15 to October 15, 2024. This includes the settlement of all
16 claims alleged in Plaintiff's PAGA notice dated April 4, 2023,
17 in the operative complaint for a total consideration of
18 \$925,000, which Defendant agrees to pay in full 90 days after
19 approval by the Court, but no earlier than 6 months from
20 today.

21 THE COURT: And if I can confirm, my understanding
22 is the 23 clients or co-employers were all ones that were
23 identified that had a rounding process? Is that correct?

24 MR. FAVAROTE: Rounding as well as failure to pay
25 overtime, Your Honor.

26 THE COURT: Now, are there any other terms -- I
27 presume this is with full releases by Plaintiff, correct? And
28 then, also subject to approval by Judge Tanada, and I presume

1 that we're going to have a reduction to a long form settlement
2 agreement in a reasonable time. Who's taking the laboring OR
3 on that?

4 MS. COOPER: We also -- the settlement will also
5 include as release parties, the actual clients as well as
6 Defendant Lyneer Staffing Solutions LLC, and do you want to
7 take the lead on the long form or do you want me to?

8 MR. FAVAROTE: I'll take lead on the long form.
9 That's correct. The release will cover Defendant and the 23
10 clients identified in Plaintiff's report on page 7.
11 Additionally, Defendant agrees to provide updated data for the
12 aggrieved employees, including the number of aggrieved
13 employees, the number of pay periods worked during the PAGA
14 period within 30 days of the day as well.

15 THE COURT: All right. So let me make sure -- and
16 I'm going to go round robin and make sure that everyone heard
17 all the terms that have been articulated by the Court and by
18 both attorneys. Mr. Favarote, you are in agreement, correct?

19 MR. FAVAROTE: Yes, Your Honor.

20 THE COURT: And will you elicit an agreement from
21 your client?

22 MR. FAVAROTE: Ms. Reyes, are you in agreement with
23 what we have described here today thus far?

24 THE PLAINTIFF: Yes, Your Honor.

25 THE COURT: And then, Ms. Cooper, you're in
26 agreement?

27 MS. COOPER: Yes, we are in agreement -- agreements.
28 And Ms. Suzette Berrios, can you just let us know if you're in

1 agreement as well?

2 THE DEFENDANT: I -- I will say I heard most of it.
3 I'm being honest. I did not hear everything, but I believe I
4 heard the salient points.

5 THE COURT: Ms. Berrios, if you can hear me, just to
6 be very clear, the salient points would be releases for --
7 it's going to apply to the temporary employees at the 23
8 employers that are listed on page 7 of the report by
9 Plaintiff's counsel. The total amount is going to be
10 \$925,000, payable 90 days after the approval of the
11 settlement, but no earlier than 6 months. You want to add
12 anything else, Counsel? And I'm going to ask Mr. Favarote --
13 there's a microphone in front of you just for the benefit of
14 everyone. Is there anything else you want to clarify for her?

15 MR. FAVAROTE: No, Your Honor.

16 THE COURT: Okay. I think we've got enough.
17 Anything else for the good of the order?

18 MS. COOPER: No, Your Honor.

19 THE COURT: I'm going to do this, though. We have
20 trial readiness conference in Judge Tanada's department.
21 Which department is that?

22 THE CLERK: S33, Your Honor.

23 THE COURT: S33. It's for October 16th at 8:30.
24 I'm going to convert that unless there's an objection to an
25 OSC status to settlement. So you can inform Judge Tanada
26 what's going on, and then I would vacate the Court trial
27 scheduled for October 20th at 10 a.m. Is there any objection
28 if I do that?

1 MR. FAVAROTE: As long as this agreement is
2 enforceable under 664.6.

3 THE COURT: I have audio recorded for that purpose.
4 You can request a transcript if you need it, or a copy of the
5 audio that you can have converted to a transcript. One hopes
6 you don't need it.

7 MR. FAVAROTE: Thank you, Your Honor.

8 THE COURT: All right.

9 MS. COOPER: No objection.

10 THE COURT: And then can we waive notice?

11 MR. FAVAROTE: Yes, Your Honor.

12 MS. COOPER: Yes. Notice is waived.

13 THE COURT: All right. Thank you very much.
14 Congratulations on getting the matter resolved. You move
15 forward with your lives. We'll see you -- well, take care and
16 give Judge Tanada our best.

17 MR. FAVAROTE: Thank you, Your Honor. Appreciate
18 your time.

19 MS. COOPER: Thank you.

20 THE PLAINTIFF: Thank you, Judge.

21 THE DEFENDANT: Thank you, Your Honor.

22 (Proceedings adjourned at 4:19 p.m.)
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28

CERTIFICATE

COMPLEX-PAGA - Reyes,)
)
 Plaintiff,)
)
 vs.) Case No. CIVSB2317672
)
 Lyneer Staffing Solutions,)
 LLC, et al.)
)
 Defendants.)
)

STATE OF CALIFORNIA)
) SS
 COUNTY OF SAN BERNARDINO)
)

I, LESLIE HINMAN, transcriptionist, do hereby
 certify that the foregoing pages, 1 to 8, inclusive,
 constitute to the best of my knowledge and belief a full, true
 and correct transcription of the audio recorded proceedings
 held in the matter of the above-entitled cause held on October
 9, 2025

Dated this 21st day of December, 2025.



Leslie Hinman
 Transcriptionist

EXHIBIT C

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Client Name	Pay Period Count	Number of Unfavorably Rounded Periods	Number of Unfavorable Minutes
4EXCELSIOR	2,360	1,542	(15,173)
Calerie Health Holding LLC.	176	126	(1,220)
Cosmetic Enterprises, Ltd.	869	515	(22,677)
Craftech Corporation	1,837	948	(7,616)
DG LOGISTICS	953	950	(109,891)
Expert Coatings & Graphics, Inc.	204	111	(785)
Fantasy Files Inc.	535	107	(1,159)
Fashion Logistics (Branch 80)	78	38	(38)
Killer Merch, LLC- 20630 PLUMMER	249	124	(325)
Killer Merch, LLC- 9541 MASON	362	161	(796)
Lacerta Group, LLC.	163	105	(4,041)
Linzer Products Corp.	386	230	(2,573)
NTDS 2- 80-MSP	53	30	(210)
O.C. Pallets	34	17	(147)
PINTO EXPRESS INC	290	287	(9,136)
SANTA FE WAREHOUSE-COMMERCE	743	482	(16,494)
Sojo Industries	71	41	(303)
Sojo Industries (Nevada)	221	106	(1,113)
Three Hands Corporation-Unloaders	1,369	660	(3,387)
Under Armour-Fontana	5,094	3,214	(39,494)
UNIQUE LOGISTICS INTERNATIONAL (90)	393	268	(3,555)
UPS CA 01	572	313	(8,259)
World Wide Logistics Group (NTDS)CA	207	112	(1,133)
	17,219	10,487	(249,525)

There are 1,817 employees observed in the rounding analysis data. The number of employees that experienced at least one pay period with unfavorable rounding is 1,478 or 81.3%. Exhibit D shows a comparison by client of the number of employees versus the number of employees that experienced at least 1 unfavorable pay period.

6. Unpaid Overtime Premium Analysis

Employees were negatively impacted due to the underpayment of daily overtime hours. A comparison of payroll data and time punch data shows that a percentage of employees worked daily overtime (a single shift with hours in excess of 8.0) but were paid at a straight rate for these hours over 8.0. The time punch data hours were totaled by employee and pay period in preparation for a

EXHIBIT D

NOTICE OF PAGA ACTION SETTLEMENT

This is an Official Court Notice of the Settlement in the following lawsuit:
Reyes v. Lyneer Staffing Solutions, LLC, San Bernardino County Superior Court Case
No. CIVSB2317672

Name [insert name]

Address [insert address]

YOU ARE HEREBY NOTIFIED AS FOLLOWS:

A California Private Attorneys General Act ("PAGA") lawsuit has been settled against Lyneer Staffing Solutions, LLC ("Lyneer") that was brought by former employee Maria Reyes ("Representative Plaintiff"). You are receiving this notice because you either are or were an hourly employee for Lyneer at any time from April 4, 2022, to October 15, 2024 that worked on one or more of the 23 client accounts identified below that are covered by the settlement: 4EXCELSIOR; Calerie Health Hldg LLC.; Cosmetic Enterprises, Ltd.; Craftech Corporation; DG LOGISTICS; Expert Coatings & Graphics, Inc.; Fantasy Files Inc.; Fashion Logistics (Branch 80); Killer Merch, LLC-20630 PLUMMER; Killer Merch, LLC-9541 MASON; Lacerta Group, LLC; Linzer Products Corp.; NTDS 2- 80-MSP; O.C. Pallets; PINTO EXPRESS INC.; SANTA FE WAREHOUSE-COMMERCE; Sojo Industries; Sojo Industries (Nevada); Three Hands Corporation-Unloaders; Under Armour-Fontana; UNIQUE LOGISTICS INTERNATIONAL (90); UPS CA 01; and World Wide Logistics Group (NTDS) CA.

A PAGA action is a case for civil penalties where 75% of the penalties recovered go to the State of California and 25% to the aggrieved employees represented in the case. You cannot opt out of the PAGA settlement and even if you do not cash your settlement check you will still be bound by the release in the case. The PAGA claims being released are for claims alleged based on the facts and theories of liability set forth in the operative complaint and Plaintiff's PAGA Notice to the LWDA dated April 4, 2023, for alleged violations of Labor Code sections 201, 202, 202(a), 203, 226, 226(a), 226(b), 226.7, 510, 512, 558, 558.1, 1174, 1175, 1194, 1194.2, 1197, 1197.1, 1198 and 2802, as well as the IWC Wage Orders. The release of claims in this case does not apply to any other claims that you have or may have against Lyneer or for any claims outside of the covered settlement period.

Representative Plaintiff contends that Lyneer did not timely pay all wages due and for all time worked on the clock or under its control, including rounding, and for all minimum, straight and overtime wages; failed to provide legally adequate meal periods and rest breaks; failed to reimburse for business expenses such as personal cell phone usage and mileage; and failed to provide accurate itemized wage statements.

Lyneer denies any wrongdoing. The Court has not made any ruling about the merits of either Representative Plaintiff's claims or of Lyneer's defenses.

The settlement provides for \$925,000.00, less the cost of settlement administration by Apex Class Action LLC (up to \$12,990.00), the proposed enhancement payment to Plaintiff for bringing this matter on behalf of the LWDA and the aggrieved employees (\$15,000.00), Plaintiff's Counsels' proposed attorneys' fees of 35% (\$323,750.00) and litigation costs (up to \$53,000.00) for a total of \$520,260.00 to the LWDA and aggrieved employees. Pursuant to PAGA, 75% of the remainder (\$390,195.00) will be distributed to the California Labor Workforce Development Agency ("LWDA") as penalties, and 25% (\$130,065.00) will be distributed to the aggrieved employees. For purposes of calculating a PAGA Settlement Group Member's individual settlement share, each PAGA Settlement Group Member will receive an amount that bears the same ratio to his or her pay periods worked for the Defendant on the 23 client accounts at issue, during the covered period, to the total number of pay periods worked by all PAGA Settlement Group Members during the covered period.

100% of your settlement share will be reported using IRS Form 1099s, since all funds are for the settlement of civil penalties. Neither Lyneer nor PAGA Counsel make any representations regarding the tax implications of any amounts paid under this settlement and you should notify your tax advisor of the payment or if you have any questions.

ADDITIONAL INFORMATION

You should contact the settlement administrator to report any change of your address after you receive this notice.

Please do not contact the Court or the Court Clerk about this notice. For additional information, you may access the publicly available information regarding this lawsuit. That information is available online at <https://www.sb-court.org/divisions/civil-general-information/court-case-information-and-document-sales>, or at the office of the clerk of the San Bernardino County Superior Court, located at 247 West 3rd St. San Bernardino, California 92415. You may also contact the settlement administrator if you lose your check or do not get a 1099 Form at:

Apex Class Action, LLC

ADDRESS

TOLL-FREE PHONE NUMBER; FAX

E-MAIL ADDRESS

The attorneys for Plaintiff and representing the State of California are:

TOREY JOSEPH FAVAROTE

DAVID H. DANNING

GLEASON & FAVAROTE LLP

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Email: tfavarote@gleasonfavarote.com

ddanning@gleasonfavarote.com

PLEASE DO NOT CALL OR WRITE THE COURT ABOUT THIS NOTICE.

EXHIBIT E

DECLARATION OF MARIA REYES

I Maria Reyes, declare and state as follows:

1. I am the named plaintiff in this action and was employed by Lyneer Staffing Solutions, LLC ("Defendant" or "Lyneer") as a payroll processor for over 10 years until around March of 2023. I have personal knowledge of the facts stated herein and would and could testify competently thereto if sworn as a witness.

2. Lyneer is a staffing company which employs temporary workers in California and places them at client locations throughout the state. I worked collecting time records and processing payroll for dozens of Lyneer's clients throughout California for over a decade.

3. I have spent a significant amount of time participating in this litigation over the past 2.5 years, taking days off of work at my job and forgoing time I planned to spend driving for Uber Eats in order to participate in this litigation. I estimate that I have spent more than 80 hours assisting with the case, largely through the tasks set forth below. I spent a significant amount of time reviewing and responding to more than 156 special interrogatories, and two sets of form interrogatories, which included digging up information and reviewing records in my possession. I frequently answered questions from my attorneys, providing special insight I had into Lyneer's operations due to my former position processing payroll. I also helped my attorneys review some of the more than 680,000 pages of paper time and payroll records in the case and helped my attorneys prepare for the deposition of three Lyneer branch managers and the Regional Vice President by providing background information.

4. I also took 3 days off of work in order to prepare for and attend two full days of my deposition, which required me to stay overnight in a hotel. I also took a day off work to personally attend the mandatory settlement conference with Judge Ortiz. I have further spent time preparing to testify at trial, talking and meeting with my attorneys on the status of the case, and providing as many details as I could remember whenever my attorneys had questions.

5. By suing Lyneer I feel as though I ran a risk of being blacklisted by a large number of employers in San Bernardino and Los Angeles counties, as any number of employers could easily find out about the lawsuit and blacklist me. Despite my fear, I was determined to continue

1 this action for the good of the other current and former employees and the State of California.

2 6. Aside from my share of the settlement as a PAGA group member, and whatever
3 representative award the Court approves, I am not receiving any additional compensation from
4 anyone in connection with the settlement.

5 7. I believe I have been diligent and acted above and beyond that of which is expected
6 of a PAGA representative, and will continue to do so up to and including approval of the
7 settlement.

8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct.

10 Executed on 20/01/2026 at El Monte, California.

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12 
13 MARIA REYES (10/1/2026 13:16:35 PST)
14 Maria Reyes
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EXHIBIT F

Gleason & Favarote LLP
 3646 Long Beach Blvd.
 Suite 203
 Long Beach, 90807
 United States
 213-452-0510



GLEASON & FAVAROTE LLP

Maria Reyes

Balance \$744,281.12
Invoice # 07254
Invoice Date January 23, 2026
Payment Terms Due on Receipt
Due Date January 23, 2026

**Reyes vs. Lyneer Staffing Solutions,
 LLC (PAGA) (501.002)**

Time Entries

DATE	EE	ACTIVITY	DESCRIPTION	RATE	HOURS	LINE TOTAL
03/09/2023	TJF	Review	Review client records.	\$750.00	0.7	\$525.00
03/10/2023	TJF	Conference	Conference with David Danning regarding case and strategy.	\$750.00	0.3	\$225.00
04/04/2023	TJF	Review	Review and revise PAGA letter.	\$750.00	1.2	\$900.00
04/18/2023	TJF	Review	Review and revise draft complaint.	\$750.00	3.4	\$2,550.00
04/21/2023	TJF	Review	Review and revise request for records and draft complaint.	\$750.00	1.8	\$1,350.00
04/25/2023	TJF	Review	Review and revise email to defense counsel regarding records request and conference with David Danning regarding the same.	\$750.00	0.3	\$225.00
06/02/2023	TJF	Review	Review and respond to email from defense counsel.	\$750.00	0.3	\$225.00
06/06/2023	TJF	Review	Review and respond to correspondence defense counsel.	\$750.00	0.6	\$450.00
06/14/2023	TJF	Email	Email to defense counsel regarding status of documents requested.	\$750.00	0.2	\$150.00
06/21/2023	TJF	Review	Review and respond to email from defense counsel.	\$750.00	0.2	\$150.00
07/10/2023	TJF	Prepare	Prepare for call with defense counsel.	\$750.00	0.8	\$600.00
07/31/2023	DD	Draft	Draft and prepare PAGA Complaint.	\$275.00	0.6	\$165.00
07/31/2023	TJF	Review	Review and revise complaint.	\$750.00	0.2	\$150.00
08/15/2023	DD	Draft	Draft special interrogatories set one.	\$275.00	1.3	\$357.50

08/16/2023	DD	Draft	Draft request for production of documents set one (1.4); draft form interrogatories - general (.2); draft form interrogatories - employment law (.2);	\$275.00	1.8	\$495.00
08/22/2023	TJF	Review	Review and revise discovery and prepare email to David Danning regarding the same.	\$750.00	0.6	\$450.00
09/05/2023	DD	Draft	Draft PMK notice with document requests.	\$275.00	0.8	\$220.00
09/07/2023	TJF	Revise	Review and revise deposition notice.	\$750.00	0.5	\$375.00
10/16/2023	DD	Draft	Draft and revise follow up letter regarding defendant's failure to serve discovery responses.	\$275.00	0.4	\$110.00
10/16/2023	TJF	Review	Review and revise meet and confer letter to defense counsel.	\$750.00	0.3	\$225.00
11/01/2023	DD	Draft	Draft motion to compel responses to discovery set one.	\$275.00	2.4	\$660.00
11/02/2023	DD	Draft	Draft and revise Favarote declaration (0.5); revise and edit motion to compel responses (0.3).	\$750.00	0.8	\$600.00
11/02/2023	TJF	Review	Review and revise motions to compel.	\$750.00	2.2	\$1,650.00
11/03/2023	DD	Revise	Revise and edit motions to compel responses (1.7); revise and edit Favarote declaration in support (0.7); draft and revise proposed order (0.4).	\$275.00	2.8	\$770.00
11/03/2023	TJF	Work	Work in connection with motions to compel.	\$750.00	0.8	\$600.00
11/16/2023	DD	Correspond	Correspond with client regarding additional data.	\$275.00	0.1	\$27.50
11/21/2023	TJF	Review	Review and revise additional discovery to propound on defendant.	\$750.00	0.8	\$600.00
11/30/2023	DD	Draft	Draft timeline with documents of discovery and meet and confer process.	\$275.00	0.5	\$137.50
01/11/2024	DD	Send	Send request for meet and confer call to defense counsel.	\$275.00	0.1	\$27.50
01/11/2024	TJF	Review	Review defendant's opposition to motion to compel and conferences with David Danning regarding the same and case strategy.	\$750.00	1.8	\$1,350.00
01/12/2024	DD	Call	Prepare for and attend meet and confer call with opposing counsel.	\$275.00	0.4	\$110.00
01/12/2024	TJF	Review	Review defendant's proposed statement and prepare for meet and confer call in preparation for case management conference and conference with David Danning regarding the same.	\$750.00	2.8	\$2,100.00
01/16/2024	DD	Revise	Revise and edit rely in support of motion to compel.	\$275.00	0.5	\$137.50
01/17/2024	DD	Revise	Revise and edit reply in support of motions to compel.	\$275.00	2.5	\$687.50
01/17/2024	TJF	Work	Work on reply for motion to compel and conference with David Danning regarding the same.	\$750.00	2.3	\$1,725.00
01/22/2024	DD	Draft	Draft and revise plaintiff's portion of joint case management statement.	\$275.00	1.5	\$412.50
01/22/2024	DD	Call	Update client on case.	\$275.00	0.1	\$27.50
01/22/2024	DD	Research	Research indispensable third parties.	\$275.00	0.7	\$192.50
01/22/2024	TJF	Prepare	Prepare for case management conference and review and revise draft statement, and research in connection with the same.	\$750.00	0.8	\$600.00

01/23/2024	DD	Revise	Revise and edit joint case management statement.	\$275.00	1.2	\$330.00
01/23/2024	TJF	Review	Review and revise case management conference statement for the court; review and respond to email from defense counsel.	\$750.00	1.8	\$1,350.00
01/29/2024	TJF	Prepare	Prepare for case management conference.	\$750.00	1.9	\$1,425.00
01/30/2024	DD	Research	Research whether PAGA claims can be subject to a jury trial.	\$275.00	0.7	\$192.50
01/31/2024	DD	Draft	Draft an revise meet and confer email for informal conference.	\$275.00	0.2	\$55.00
01/31/2024	TJF	Prepare	Work in connection with informal discovery conference, and email to defense counsel in connection with setting of the same.	\$750.00	0.3	\$225.00
02/05/2024	DD	Revise	Revise and edit notices of deposition.	\$275.00	0.6	\$165.00
02/07/2024	DD	Draft	Draft follow up email regarding informal discovery conference for attorney review.	\$275.00	0.2	\$55.00
02/09/2024	DD	Draft	Draft and revise additional deposition topics and notice.	\$275.00	0.6	\$165.00
02/15/2024	DD	Call	Call court to determine if joint statement is needed for informal discovery conferece.	\$275.00	0.2	\$55.00
02/21/2024	DD	Attend	Prepare for and attend informal discovery conference.	\$275.00	0.7	\$192.50
03/01/2024	DD	Communicate	Communicate with client to set up a call.	\$275.00	0.1	\$27.50
03/01/2024	TJF	Review	Review Court order.	\$750.00	0.2	\$150.00
03/04/2024	TJF	Conference	Conference with David Danning regarding discovery for call with client in connection with the same.	\$750.00	1.8	\$1,350.00
03/05/2024	DD	Research	Analyze authority in defendant's informal conference statement.	\$275.00	0.7	\$192.50
03/05/2024	DD	Draft	Draft response to defendants authorities on managability.	\$275.00	2.8	\$770.00
03/05/2024	TJF	Review	Review defendant's statement regarding the scope of discovery and conference with David Danning in connection with the same; prepare for conference with client.	\$750.00	1.6	\$1,200.00
03/06/2024	DD	Revise	Revise and edit informal conference statement.	\$275.00	0.8	\$220.00
03/06/2024	TJF	Conference	Conference with David Danning regarding case management conference and informal discovery conference, and prepare for the same; review defendant's informal discovery conference statement and research cases cited therein.	\$750.00	2.3	\$1,725.00
03/07/2024	TJF	Prepare	Prepare for and attend case management conference and informal discovery conference with the court.	\$750.00	1.7	\$1,275.00
03/19/2024	DD	Communicate	Correspond with client about additional documents.	\$350.00	0.3	\$105.00
04/01/2024	TJF	Conference	Conference with David Danning regarding the case.	\$750.00	0.2	\$150.00

04/02/2024	TJF	Prepare	Prepare for informal discovery conference with the court and case management conference.	\$750.00	1.3	\$975.00
04/03/2024	DD	Attend	Prepare for and attend case management hearing.	\$350.00	0.5	\$175.00
04/03/2024	TJF	Prepare	Prepare for and attend informal discovery conference and continued case management conference and conferences with David Danning connection with the same and notice of order to show cause for defendant's failure to appear.	\$750.00	1.2	\$900.00
04/08/2024	DD	Correspond	Correspond with defendant's counsel regarding discovery.	\$350.00	0.7	\$245.00
04/08/2024	TJF	Review	Review correspondence from defense counsel and conference with David Danning regarding the same; work in connection with preparing person most knowledgeable deposition notice and for the deposition; prepare for call with defense counsel.	\$750.00	4.8	\$3,600.00
04/09/2024	TJF	Prepare	Prepare for meet and confer call with defense counsel; prepare outline for PMK deposition.	\$750.00	4.6	\$3,450.00
04/10/2024	DD	Draft	Draft and revise deposition notice and cover letter.	\$350.00	0.5	\$175.00
04/10/2024	DD	Attend	Attend conference call with defendant's counsel.	\$350.00	0.9	\$315.00
04/10/2024	TJF	Prepare	Prepare for meet and confer call with defense counsel; review and revise person most knowledgeable deposition notice.	\$750.00	1.8	\$1,350.00
04/16/2024	DD	Review	Review documents produced by defendant's counsel.	\$350.00	0.4	\$140.00
04/17/2024	DD	Communicate	Correspond with plaintiff's counsel regarding discovery.	\$350.00	0.2	\$70.00
04/17/2024	TJF	Review	Review documents produced by defendant; prepare for meet and confer call with defense counsel and conference with David Danning in connection with the same.	\$750.00	2.8	\$2,100.00
04/17/2024	TJF	Review	Review and revise correspondence to the client regarding court ruling on arbitration decision and related issues regarding current arbitration agreement.	\$750.00	0.5	\$375.00
04/22/2024	DD	Communicate	Prepare for and attend portion of call with defendant's counsel.	\$350.00	0.3	\$105.00
04/22/2024	TJF	Prepare	Prepare for meet and confer call with defense counsel.	\$750.00	1.9	\$1,425.00
04/29/2024	DD	Draft	Draft, revise and send meet and confer letter regarding discovery.	\$350.00	1.3	\$455.00
04/29/2024	TJF	Review	Review and revise meet and confer letter; conference with David Danning regarding the same.	\$750.00	1.8	\$1,350.00
04/30/2024	DD	Draft	Draft and revise Belaire-West notice.	\$350.00	0.9	\$315.00
04/30/2024	DD	Call	Attend call with defendant's counsel on document production.	\$350.00	1.0	\$350.00
04/30/2024	DD	Draft	Draft plaintiff's portion of joint statement for informal discovery conference.	\$350.00	0.6	\$210.00
04/30/2024	TJF	Prepare	Prepare for and conduct call with defense counsel to meet and confer on discovery issues.	\$750.00	2.6	\$1,950.00

05/01/2024	TJF	Review	Review and revise case management conference/informal discovery conference statement and conference with David Danning regarding the same.	\$750.00	0.4	\$300.00
05/06/2024	DD	Revise	Revise and edit informal discovery statement.	\$350.00	0.2	\$70.00
05/08/2024	TJF	Prepare	Prepare for case management conference and informal discovery conference with the court; review correspondence from defense counsel and work in connection with preparing response to the same.	\$750.00	1.2	\$900.00
05/09/2024	TJF	Prepare	Prepare for and attend case management conference and informal discovery conference and conferences with David Danning regarding the same; prepare for person most knowledgeable deposition.	\$750.00	6.7	\$5,025.00
05/10/2024	TJF	Prepare	Prepare for person most knowledgeable deposition.	\$750.00	6.9	\$5,175.00
05/12/2024	DD	Revise	Revise and edit deposition outline.	\$350.00	0.9	\$315.00
05/12/2024	DD	Review	Review documents and create deposition exhibits.	\$350.00	1.3	\$455.00
05/13/2024	DD	Document Preparation	Create additional exhibits from newly produced document.	\$350.00	2.7	\$945.00
05/13/2024	TJF	Prepare	Prepare for person most knowledgeable deposition, and review and revise outline in connection with the same and exhibits.	\$750.00	6.9	\$5,175.00
05/14/2024	DD	Prepare	Prepare documents and research in preparation for deposition.	\$350.00	1.2	\$420.00
05/14/2024	DD	Review	Review discovery and prepare list of questions and requests for client to respond to discovery.	\$350.00	1.6	\$560.00
05/14/2024	DD	Communicate	Communication with client on issues and information obtained in deposition.	\$350.00	0.4	\$140.00
05/14/2024	TJF	Prepare	Prepare for and take person most knowledgeable deposition.	\$750.00	9.1	\$6,825.00
05/15/2024	DD	Research	Research effect of deposition admissions on summary judgment, record requirements under the Labor Code, and defendant's ability to assert additional affirmative defenses at summary judgment.	\$350.00	3.2	\$1,120.00
05/15/2024	TJF	Prepare	Prepare notes for file from person most knowledgeable deposition.	\$750.00	0.8	\$600.00
05/19/2024	DD	Draft	Draft and revise discovery responses.	\$350.00	2.9	\$1,015.00
05/20/2024	DD	Prepare	Prepare docusign and verification email for client.	\$350.00	0.2	\$70.00
05/20/2024	TJF	Conference	Conference with David Danning regarding discovery.	\$750.00	0.3	\$225.00
05/21/2024	DD	Communicate	Communicate with client to answer questions about discovery responses and obtain verifications.	\$350.00	0.5	\$175.00
05/21/2024	DD	Revise	Revise and edit discovery responses.	\$350.00	1.2	\$420.00
05/21/2024	TJF	Review	Review and revise discovery responses.	\$750.00	1.6	\$1,200.00
05/22/2024	TJF	Review	Review correspondence from defense counsel and conference with David Danning regarding plaintiff's deposition.	\$750.00	0.2	\$150.00

05/24/2024	DD	Communicate	Communicate with defendant's counsel on deposition dates and outstanding discovery.	\$350.00	0.5	\$175.00
05/24/2024	TJF	Review	Review person most knowledgeable deposition; review and revise meet and confer correspondence to defense counsel; review correspondence from defense counsel regarding outstanding discovery.	\$750.00	3.8	\$2,850.00
05/29/2024	DD	Communicate	Draft emails to defendant's counsel following up on outstanding discovery and document production.	\$350.00	0.4	\$140.00
05/29/2024	TJF	Conference	Conference with David Danning regarding meet and confer correspondence from defense counsel and work in connection with prepare response to the same.	\$750.00	0.9	\$675.00
05/31/2024	TJF	Review	Review defendant supplemental responses to discovery and prepare notes in connection with the same, and draft correspondence to David Danning in connection with the same.	\$750.00	1.8	\$1,350.00
06/05/2024	DD	Communicate	Communicate with client on additional discovery served by defendant.	\$350.00	0.1	\$35.00
06/05/2024	DD	Communicate	Communicate with defendant's counsel on outstanding documents, discovery responses, and Belaire-West notice.	\$350.00	0.4	\$140.00
06/10/2024	DD	Communicate	Follow up with defendant's counsel on documents, discovery responses, Belaire-West notice and PAGA group information.	\$350.00	0.1	\$35.00
06/10/2024	DD	Draft	Draft responses to defendant's special interrogatories.	\$350.00	2.2	\$770.00
06/11/2024	DD	Communicate	Communicate with client regarding depositions.	\$350.00	0.2	\$70.00
06/14/2024	DD	Communicate	Communicate with defendant's counsel regarding documents, Belaire-West notice, and PAGA group information.	\$350.00	0.1	\$35.00
06/14/2024	TJF	Conference	Conference with David Danning regarding discovery and document production from defendant.	\$750.00	0.3	\$225.00
06/24/2024	DD	Review	Review deposition transcript.	\$350.00	0.9	\$315.00
06/24/2024	TJF	Review	Review additional documents produced by defendant.	\$750.00	2.2	\$1,650.00
07/09/2024	DD	Communicate	Communicate with defendant's counsel regarding case management statement.	\$350.00	0.2	\$70.00
07/09/2024	TJF	Conference	Conference with David Danning regarding discovery issues; review and respond to correspondence from defense counsel regarding outstanding discovery issues; review and revise draft joint statement for the court.	\$750.00	0.8	\$600.00
07/10/2024	DD	Revise	Revise and edit case management statement.	\$350.00	0.4	\$140.00
07/10/2024	DD	Call	Attend meet and confer call with defendant's counsel.	\$350.00	0.7	\$245.00
07/10/2024	TJF	Prepare	Prepare for order to show cause hearing on motions to compel and conference with defense counsel in connection with the same; review and revise case management conference statement.	\$750.00	2.7	\$2,025.00
07/11/2024	DD	Revise	Revise and edit proposed belaire-west notice.	\$350.00	0.2	\$70.00

07/11/2024	TJF	Finalize	Finalize case management conference statement and conference with David Danning regarding the same; and work in connection with preparing for order to show cause and motions to compel.	\$750.00	1.3	\$975.00
07/12/2024	DD	Communicate	Communicate with client to set up deposition preparation.	\$350.00	0.2	\$70.00
07/16/2024	TJF	Prepare	Prepare for case management conference and motion to compel hearing.	\$750.00	1.6	\$1,200.00
07/17/2024	TJF	Prepare	Prepare for hearing on motions to compel, and case management conference; and conferences with David Danning regarding the same.	\$750.00	1.9	\$1,425.00
07/31/2024	TJF	Review	Review and respond to correspondence from defense counsel regarding Belaire notice and claims administrator.	\$750.00	0.4	\$300.00
08/02/2024	PMG	Review	Review and respond to correspondence from defense counsel and notice administrator.	\$750.00	0.5	\$375.00
08/03/2024	DD	Communicate	Communicate with client to provide case update.	\$350.00	0.1	\$35.00
08/06/2024	DD	Draft	Draft redlines to Belaire-West notice, communicate with plaintiff's counsel.	\$350.00	0.6	\$210.00
08/07/2024	DD	Attend	Attend OSC on Belaire-West notice.	\$350.00	1.0	\$350.00
08/14/2024	TJF	Review	Review correspondence from notice administrator regarding timeline on mailing.	\$750.00	0.5	\$375.00
08/16/2024	TJF	Review	Review email from defense counsel regarding notice.	\$750.00	0.2	\$150.00
08/19/2024	DD	Communicate	Communicate correct version of Belaire-West notice to claims administrator.	\$350.00	0.1	\$35.00
08/22/2024	DD	Review	Review data provided by defendant.	\$350.00	0.7	\$245.00
08/22/2024	TJF	Review	Review email and time and payroll data from defense counsel, and conference with David Danning regarding the same.	\$750.00	4.9	\$3,675.00
08/26/2024	DD	Analyze	Analyze time and payroll data produced, identify issues.	\$350.00	1.8	\$630.00
08/27/2024	DD	Call	Attend call with defendant's counsel, draft confirmatory email and summary of issues with data.	\$350.00	1.2	\$420.00
08/27/2024	TJF	Conference	Conferences with David Danning regarding discovery issues and review new data produced by the defendant; draft correspondence to defense counsel in connection with the same and deficiencies in the data.	\$750.00	1.8	\$1,350.00
08/29/2024	DD	Draft	Draft communication to plaintiff's counsel on data issue and Plaintiff's deposition.	\$350.00	0.5	\$175.00
09/04/2024	TJF	Review	Review email correspondence from defense counsel regarding status of outstanding discovery issues and conference with David Danning regarding the same.	\$750.00	0.8	\$600.00
09/05/2024	DD	Communicate	Draft email to defendant's counsel regarding data and required information.	\$350.00	0.6	\$210.00
09/05/2024	TJF	Review	Review additional data from defendant regarding time and payroll information; review and respond to email from defense counsel in connection with the same; prepare correspondence to expert and conferences with David Danning in connection with the same.	\$750.00	3.6	\$2,700.00

09/06/2024	DD	Draft	Draft and revise declaration of Torey Favarote.	\$350.00	1.2	\$420.00
09/06/2024	TJF	Review	Review and respond to correspondence from expert and conference with David Danning regarding the same; review and revise declaration regarding outstanding discovery issues pursuant to the court's requests.	\$750.00	3.9	\$2,925.00
09/09/2024	TJF	Review	Review correspondence from defense counsel and conference with David Danning regarding the same, and outstanding discovery issues; prepare correspondence to expert regarding case data.	\$750.00	0.9	\$675.00
09/10/2024	DD	Communicate	Communicate with expert for data analysis.	\$350.00	0.2	\$70.00
09/10/2024	DD	Draft	Draft follow up communication regarding status of belaire-west notice.	\$350.00	0.2	\$70.00
09/10/2024	DD	Communicate	Draft communication to defendant's counsel regarding expert and protective order.	\$350.00	0.3	\$105.00
09/10/2024	TJF	Conference	Conferences with David Danning regarding case strategy; prepare for OSC and draft correspondence to expert regarding data.	\$750.00	2.8	\$2,100.00
09/11/2024	TJF	Prepare	Prepare correspondence to defense counsel regarding missing supplemental discovery responses; prepare for order to show cause and review new documents reduced by the defendant; review timeline from Apex regarding mailing of the Belaire-West notice; and conferences with David Danning regarding same.	\$750.00	5.6	\$4,200.00
09/12/2024	DD	Analyze	Further analysis of time and payroll records, draft summary of issues.	\$350.00	2.2	\$770.00
09/12/2024	DD	Communicate	Communicate with expert witness.	\$350.00	0.2	\$70.00
09/12/2024	DD	Research	Research effect of release on PAGA claims.	\$350.00	0.7	\$245.00
09/12/2024	TJF	Review	Review new data produced by the defendant and prepare for call with expert regarding the same; conferences with David Danning regarding PAGA data and outstanding discovery issues; prepare correspondence to administrator regarding the mailing of the notice.	\$750.00	6.7	\$5,025.00
09/13/2024	DD	Draft	Review declarations, supplemental declaration, supplemental discovery responses, draft summary of issues for OSC hearing.	\$350.00	4.2	\$1,470.00
09/13/2024	TJF	Prepare	Prepare for call with expert and call with expert regarding data review; prepare correspondence to defense counsel and review correspondence from defense counsel regarding supplemental responses.	\$750.00	3.2	\$2,400.00
09/16/2024	DD	Attend	Prepare for and attend hearing on discovery.	\$350.00	0.9	\$315.00
09/16/2024	DD	Revise	Revise and edit draft protective order in redline.	\$350.00	0.8	\$280.00
09/16/2024	TJF	Prepare	Prepare for and attend order to show cause; review and revise draft protective order; and conferences with David Danning regarding the same.	\$750.00	4.2	\$3,150.00
09/17/2024	DD	Communicate	Communicate with expert regarding data link.	\$350.00	0.1	\$35.00
09/17/2024	DD	Draft	Create new protective order and redline after order sent by defendant was revealed to be unworkable.	\$350.00	0.9	\$315.00
09/18/2024	DD	Draft	Draft meet and confer letter regarding supplemental responses.	\$350.00	0.8	\$280.00

09/18/2024	TJF	Review	Review supplemental responses from defendant; review and revise draft meet and confer letter, and conferences with David Danning regarding the same.	\$750.00	4.8	\$3,600.00
09/19/2024	DD	Revise	Revise and edit meet and confer letter.	\$350.00	0.2	\$70.00
09/19/2024	TJF	Review	Review and revise draft meet and confer letter for defense counsel regarding deficient supplemental responses and conference with David Danning regarding the same.	\$350.00	4.2	\$1,470.00
09/20/2024	DD	Revise	Revise and edit meet and confer letter, send to defendant's counsel.	\$350.00	0.4	\$140.00
09/20/2024	TJF	Prepare	Prepare meet and confer letter regarding supplemental responses and conference with David Danning regarding deficient responses.	\$750.00	4.4	\$3,300.00
09/23/2024	TJF	Prepare	Prepare for and conduct calls with the aggrieved employees regarding work experience and prepare questionnaire; conferences with David Danning in connection with the same.	\$750.00	4.9	\$3,675.00
09/24/2024	DD	Revise	Make final revisions to protective order and circulate for execution.	\$350.00	0.2	\$70.00
09/24/2024	DD	Communicate	Communicate extensively with defendant's counsel, attempt to revise protective order.	\$350.00	1.1	\$385.00
09/24/2024	TJF	Review	Review and respond to numerous correspondences from defense counsel regarding outstanding discovery issues and draft protective order; calls with aggrieved employees regarding work experience; and conference with David Danning in connection with the same.	\$750.00	7.8	\$5,850.00
09/25/2024	DD	Communicate	Draft communication to plaintiff's counsel on status of expert document production and protective order.	\$350.00	0.3	\$105.00
09/25/2024	TJF	Review	Review notes from calls with aggrieved employees and conference with David Danning regarding the same; prepare for calls with aggrieved employees regarding work experience.	\$750.00	4.8	\$3,600.00
09/26/2024	TJF	Review	Review and respond to email correspondence from defense counsel and protective order issues; review additional data from defendant and work in connection with aggrieved employee interviews.	\$750.00	5.8	\$4,350.00
09/27/2024	TJF	Review	Review person most knowledgeable deposition.	\$750.00	3.8	\$2,850.00
09/30/2024	DD	Communicate	Communicate with defendant's counsel on protective order.	\$350.00	0.1	\$35.00
09/30/2024	DD	Send	Research and prepare freedom of information act request to the department of industrial relations.	\$350.00	0.2	\$70.00
09/30/2024	TJF	Conference	Conference with David Danning regarding status of protective order and work in connection with the same.	\$750.00	0.4	\$300.00
10/01/2024	DD	Communicate	Communicate with defendant's counsel on protective order.	\$350.00	0.1	\$35.00
10/01/2024	TJF	Work	Work in connection with interview of aggrieved employees.	\$750.00	2.3	\$1,725.00
10/02/2024	TJF	Review	Review time records and prepared notes in regard to the same; review defendant's supplemental responses to document production request.	\$750.00	3.4	\$2,550.00

10/03/2024	TJF	Review	Review defendant's supplemental responses to document production requests and conference with David Danning regarding the same.	\$750.00	2.7	\$2,025.00
10/07/2024	DD	Communicate	Communicate with defendant's counsel regarding protective order.	\$350.00	0.1	\$35.00
10/07/2024	TJF	Work	Work in connection with the notice and aggrieved employee calls.	\$750.00	0.3	\$225.00
10/08/2024	TJF	Review	Review report from claims administrator.	\$750.00	0.2	\$150.00
10/10/2024	DD	Revise	Redline new protective order received from defendant.	\$350.00	0.9	\$315.00
10/11/2024	DD	Communicate	Communicate with defendant's counsel on protective order.	\$350.00	0.1	\$35.00
10/11/2024	DD	Revise	Make additional redlines to protective order.	\$350.00	0.6	\$210.00
10/14/2024	DD	Revise	Revise redlines to protective order, draft email to defendant's counsel.	\$350.00	0.5	\$175.00
10/14/2024	DD	Communicate	Communicate with client on discovery responses.	\$350.00	0.1	\$35.00
10/15/2024	DD	Revise	Revise protective order and communicate with defendant's counsel regarding revisions.	\$350.00	1.1	\$385.00
10/16/2024	DD	Revise	Revise protective order and communicate with defendant's counsel on language.	\$350.00	0.6	\$210.00
10/16/2024	DD	Call	Call back aggrieved employees who left messages for investigation.	\$350.00	1.3	\$455.00
10/17/2024	DD	Call	Call with client to obtain information for discovery responses.	\$350.00	1.4	\$490.00
10/18/2024	DD	Draft	Draft joint stipulation on protective order.	\$350.00	0.5	\$175.00
10/19/2024	DD	Draft	Draft responses to defendant's special interrogatories based on client's input.	\$350.00	2.8	\$980.00
10/21/2024	DD	Revise	Revise stipulation and send to defendant's counsel.	\$350.00	0.2	\$70.00
10/21/2024	TJF	Conference	Conference with David Danning regarding calls with aggrieved employees and work on outline in connection with the same; review and revise draft protective order.	\$750.00	3.8	\$2,850.00
10/22/2024	TJF	Review	Review correspondence from the notice administrator.	\$750.00	0.2	\$150.00
10/22/2024	TJF	Review	Review and revise draft protective order and work in connection with the same; review correspondence from defense counsel and the notice administrator.	\$750.00	1.8	\$1,350.00
10/23/2024	DD	Draft	Revise and edit responses to defendant's special interrogatories.	\$350.00	2.1	\$735.00
10/24/2024	DD	Call	Call back aggrieved employee as part of investigation.	\$350.00	0.3	\$105.00
10/25/2024	DD	Call	Call back aggrieved employees as part of investigation.	\$350.00	0.9	\$315.00
10/28/2024	DD	Communicate	Communicate with client and obtain verification of responses.	\$350.00	0.2	\$70.00
10/28/2024	DD	Research	Research responses to interrogatories.	\$350.00	0.7	\$245.00
10/28/2024	DD	Revise	Conference with Torey Favarote and revise discovery responses.	\$350.00	3.1	\$1,085.00

10/28/2024	DD	Draft	Draft and revise IDC statement.	\$350.00	0.9	\$315.00
10/28/2024	TJF	Review	Review and revise discovery responses, and conference with David Danning regarding same; prepare for informal discovery conference.	\$750.00	7.8	\$5,850.00
10/29/2024	DD	Revise	Revise and edit IDC statement.	\$750.00	1.3	\$975.00
10/29/2024	DD	Call	Call court clerk on obtaining signed approval order.	\$350.00	0.2	\$70.00
10/29/2024	TJF	Review	Review and revise informal discovery conference statement; work in connection with preparing for informal discovery conference.	\$750.00	3.9	\$2,925.00
10/30/2024	DD	Revise	Revise and edit IDC statement.	\$350.00	0.7	\$245.00
10/30/2024	DD	Prepare	Prepare joint stipulation and protective order for filing, communicate with defendant's counsel regarding the same.	\$350.00	0.3	\$105.00
10/30/2024	DD	Review	Review deposition testimony and create citations and excerpts.	\$350.00	1.2	\$420.00
10/31/2024	DD	Prepare	Prepare points, information, deposition excerpts, sample documents, and data analysis for IDC hearing.	\$350.00	5.3	\$1,855.00
11/01/2024	TJF	Prepare	Prepare for and attend order to show cause/informal discovery conference and related travel; conference with David Danning regarding the same.	\$750.00	8.6	\$6,450.00
11/05/2024	TJF	Conference	Conference with David Danning regarding case and the status of production.	\$750.00	0.3	\$225.00
11/13/2024	DD	Communicate	Provide client with a case update.	\$350.00	0.1	\$35.00
11/14/2024	TJF	Correspond	Correspondence to expert regarding data collection and conference David Danning regarding the same.	\$750.00	0.3	\$225.00
11/19/2024	DD	Attend	Prepare for and attend call with expert on documents received.	\$350.00	0.5	\$175.00
11/19/2024	TJF	Prepare	Prepare for the conduct call with expert regarding data and conferences with David Danning regarding the same.	\$350.00	2.4	\$840.00
12/05/2024	TJF	Review	Review correspondence from defense counsel.	\$750.00	0.2	\$150.00
12/06/2024	TJF	Conference	Conference with David Danning regarding plaintiff's deposition and related issues.	\$750.00	0.2	\$150.00
12/11/2024	DD	Communicate	Communicate with client regarding deposition request.	\$350.00	0.1	\$35.00
12/12/2024	DD	Draft	Draft and revised objections to notice of deposition.	\$350.00	0.2	\$70.00
12/18/2024	TJF	Review	Review deposition notice for plaintiff and conference with David Danning regarding same and documents not produced by defense counsel so far.	\$750.00	0.8	\$600.00
12/30/2024	DD	Draft	Draft and revise expert witness exchange.	\$350.00	0.2	\$70.00
12/30/2024	DD	Review	Review documents served and compare against Court order.	\$350.00	0.5	\$175.00
12/31/2024	DD	Communicate	Review document request responses.	\$350.00	0.4	\$140.00
12/31/2024	DD	Communicate	Communicate with defendant's counsel on document production and witness exchange.	\$350.00	0.2	\$70.00

12/31/2024	DD	Communicate	Communicate with defendant's counsel on document production.	\$350.00	0.6	\$210.00
01/02/2025	DD	Communicate	Communicate with expert and start reviewing scope of document production.	\$350.00	0.4	\$140.00
01/02/2025	TJF	Review	Review documents produced by the defendant on 12/31 and correspondence to expert; conference with David Danning in connection with the same.	\$800.00	3.8	\$3,040.00
01/06/2025	DD	Analyze	Review document production and draft summary of issues and points of interest.	\$350.00	0.9	\$315.00
01/06/2025	TJF	Review	Review additional documents produced by the defendant on 12/31 and conference with David Danning in connection with the same.	\$800.00	8.3	\$6,640.00
01/07/2025	DD	Review	Review and analyze document production.	\$350.00	1.4	\$490.00
01/07/2025	TJF	Review	Review data and documents provided by defendant on 12/31.	\$800.00	6.8	\$5,440.00
01/08/2025	DD	Call	Call with expert on document production.	\$350.00	1.1	\$385.00
01/08/2025	DD	Analyze	Review document production, draft additional discovery, and research rounding caselaw.	\$350.00	5.4	\$1,890.00
01/08/2025	TJF	Review	Review additional documents produced by defendant on 12/31 and conference with David Danning regarding the same.	\$800.00	3.1	\$2,480.00
01/09/2025	DD	Communicate	Deposition preparation with client.	\$350.00	2.1	\$735.00
01/09/2025	DD	Draft	Draft and revise document production requests set two.	\$350.00	0.5	\$175.00
01/10/2025	DD	Draft	Draft and revise deposition notices and discovery requests.	\$350.00	1.5	\$525.00
01/10/2025	TJF	Review	Review and revise discovery to propound on defendant including deposition notices and conference with David Danning regarding the same; prepare for plaintiff's deposition; review correspondences from defense counsel in connection with discovery issues.	\$800.00	9.8	\$7,840.00
01/12/2025	DD	Communicate	Communicate with client on documents.	\$350.00	0.3	\$105.00
01/13/2025	DD	Research	Research sanctions issue and authority for motion.	\$350.00	1.0	\$350.00
01/13/2025	DD	Communicate	Final deposition preparation with client.	\$350.00	0.6	\$210.00
01/13/2025	TJF	Work	Work in connection with preparing for plaintiff's deposition.	\$800.00	6.9	\$5,520.00
01/14/2025	DD	Analyze	Analyze deposition samples and provide counter examples.	\$350.00	2.9	\$1,015.00
01/14/2025	TJF	Prepare	Prepare for plaintiff's deposition and defend plaintiff at her deposition and conferences with David Danning regarding the same, travel to San Bernadino.	\$800.00	10.6	\$8,480.00
01/15/2025	TJF	Prepare	Prepare for and defend plaintiff at her deposition and conferences with David Danning regarding the same.	\$800.00	8.8	\$7,040.00
01/16/2025	TJF	Review	Review objections from defense counsel in connection with deposition notices; review correspondence from defense counsel in connection with the same; prepare for conference with expert and review related data.	\$800.00	4.2	\$3,360.00

01/17/2025	TJF	Prepare	Prepared notes in connection with document review and continued review of documents produced by defendant on 12/31.	\$800.00	5.2	\$4,160.00
01/19/2025	DD	Research	Research motion to strike answer and review discovery production and responses.	\$350.00	2.8	\$980.00
01/19/2025	DD	Research	Research trial continuances.	\$350.00	0.7	\$245.00
01/19/2025	TJF	Prepare	Prepare for and conduct conference with expert regarding data review and conference with David Danning regarding the same.	\$800.00	4.1	\$3,280.00
01/20/2025	DD	Call	Call with expert to discuss data.	\$350.00	0.7	\$245.00
01/20/2025	DD	Prepare	Setup file transfer.	\$350.00	0.2	\$70.00
01/20/2025	DD	Communicate	Draft communications to expert and opposing counsel.	\$350.00	0.5	\$175.00
01/20/2025	TJF	Prepare	Prepare for call with expert.	\$800.00	2.7	\$2,160.00
01/21/2025	DD	Draft	Draft and revise communications to defendant's counsel.	\$350.00	0.5	\$175.00
01/21/2025	DD	Draft	Draft and revise stipulation to continue trial and proposed order.	\$350.00	1.1	\$385.00
01/21/2025	DD	Research	Research briefing schedule on the Camp Supreme Court case.	\$350.00	0.2	\$70.00
01/21/2025	TJF	Conference	Conferences with David Danning regarding trial extension and review and revise correspondence to defense counsel in connection with the same; review and revise drafts ex parte papers and stipulation.	\$800.00	4.8	\$3,840.00
01/22/2025	DD	Draft	Draft and revise ex parte papers, revise and edit stipulation and proposed order, communicate with plaintiff's counsel regarding the same.	\$350.00	3.2	\$1,120.00
01/22/2025	TJF	Review	Review and revise stipulation to continue trial; review emails from defense counsel in connection with the same and mediation; continued review of documents produced by defendant 12/31.	\$800.00	6.8	\$5,440.00
01/23/2025	TJF	Correspond	Correspondence with defense counsel regarding ex parte papers on continuing trial and related issues.	\$800.00	0.8	\$640.00
01/29/2025	DD	Draft	Draft meet and confer email on document production issues.	\$350.00	2.6	\$910.00
01/31/2025	DD	Draft	Draft and revise plaintiff's portion of joint report in advance of status conference.	\$350.00	1.1	\$385.00
02/03/2025	DD	Revise	Research and revise plaintiff's portion of the joint statement.	\$350.00	2.3	\$805.00
02/03/2025	TJF	Review	Review and revise draft joint case management statement, review defendant's section and conference with David Danning regarding the changes.	\$800.00	3.3	\$2,640.00
02/04/2025	DD	Revise	Revise and edit joint report.	\$350.00	0.7	\$245.00
02/07/2025	TJF	Review	Review index of documents produced by defendant and conference with David Danning connection with the same.	\$800.00	4.2	\$3,360.00
02/09/2025	DD	Prepare	Compile index documents, analyze, reorganize.	\$350.00	1.7	\$595.00
02/10/2025	DD	Communicate	Call with expert on document dump.	\$350.00	0.4	\$140.00

02/10/2025	DD	Communicate	Locate and send client deposition transcripts for review and edits.	\$350.00	0.3	\$105.00
02/10/2025	DD	Analyze	Unscramble and organize index files produced by defendant, eliminate duplicates.	\$350.00	1.0	\$350.00
02/10/2025	TJF	Prepare	Prepare for case management conference; continued work reviewing index of documents; conference with David Danning and expert regarding data review.	\$800.00	6.7	\$5,360.00
02/11/2025	DD	Attend	Prepare for and attend case management conference.	\$350.00	0.5	\$175.00
02/11/2025	DD	Communicate	Send deposition transcript to client and communicate with client regarding the same.	\$350.00	0.3	\$105.00
02/11/2025	TJF	Prepare	Prepare for and attend case management conference; review defendant supplemental discovery responses and conference with David Danning regarding the same.	\$800.00	7.7	\$6,160.00
02/18/2025	TJF	Continue	Continued work reviewing defendant's discovery responses and production.	\$800.00	6.7	\$5,360.00
02/19/2025	DD	Communicate	Communicate with defendant's counsel regarding missing documents and mediation.	\$350.00	0.1	\$35.00
02/19/2025	TJF	Review	Review defendant's discovery responses and plaintiff's deposition transcript for potential changes.	\$800.00	3.9	\$3,120.00
02/20/2025	DD	Review	Review transcripts and possible errata.	\$350.00	0.9	\$315.00
02/20/2025	TJF	Continue	Continue reviewing first day of plaintiff's deposition and conference with David Danning regarding the same.	\$800.00	3.4	\$2,720.00
02/21/2025	TJF	Review	Review plaintiff's second day of deposition testimony.	\$800.00	4.8	\$3,840.00
02/24/2025	DD	Communicate	Follow up with defendant's counsel on missing documents and mediation.	\$350.00	0.1	\$35.00
03/03/2025	DD	Communicate	Follow up with defendant's counsel.	\$350.00	0.1	\$35.00
03/05/2025	DD	Communicate	Communicate with expert on related documents.	\$350.00	0.2	\$70.00
03/05/2025	DD	Draft	Draft and revise joint report for informal discovery conference.	\$350.00	0.5	\$175.00
03/06/2025	DD	Revise	Revise and edit joint report, communicate with defendant's counsel.	\$350.00	0.5	\$175.00
03/10/2025	DD	Communicate	Communicate with defendant's counsel regarding joint report, finalize joint report.	\$350.00	0.3	\$105.00
03/11/2025	DD	Communicate	Communicate with client.	\$350.00	0.1	\$35.00
03/13/2025	DD	Attend	Attend informal discovery conference.	\$350.00	0.7	\$245.00
03/20/2025	DD	Call	Call with expert and pull excel sheet references from master index and send to expert.	\$350.00	0.5	\$175.00
03/25/2025	DD	Communicate	Communicate with expert to reset call on data.	\$350.00	0.1	\$35.00
03/25/2025	DD	Communicate	Communicate with client, provide case update.	\$350.00	0.1	\$35.00
03/31/2025	DD	Call	Call with expert on data, send expert additional bates numbers for review.	\$350.00	1.0	\$350.00
04/01/2025	DD	Communicate	Communicate with client.	\$350.00	0.4	\$140.00

04/01/2025	DD	Communicate	Communicate with aggrieved employees who called.	\$350.00	0.6	\$210.00
04/03/2025	DD	Compile	Prepare compilations of PDF timecards for review.	\$350.00	1.1	\$385.00
04/16/2025	TJF	Review	Review paper time and payroll records produced by defendant.	\$800.00	3.7	\$2,960.00
04/17/2025	TJF	Continue	Continued work reviewing paper and time and payroll records produced by defendant.	\$800.00	4.7	\$3,760.00
04/18/2025	TJF	Review	Review paper time and payroll data and notes in connection with the same.	\$800.00	6.2	\$4,960.00
04/22/2025	DD	Compile	Review and compile complete sets of timecards from production.	\$350.00	2.5	\$875.00
04/28/2025	DD	Communicate	Communicate with client.	\$350.00	0.1	\$35.00
04/28/2025	TJF	Review	Review and respond to e-mail from expert and conference with David Danning regarding the same and document production; continued work reviewing documents produced by defendant.	\$800.00	4.3	\$3,440.00
04/30/2025	TJF	Review	Review person most knowledgeable deposition notice.	\$800.00	2.1	\$1,680.00
05/02/2025	TJF	Review	Review pdf of time and payroll records produced by the defendant.	\$800.00	3.7	\$2,960.00
05/05/2025	DD	Review	Review and prepare additional timecards and research inventory issues.	\$350.00	1.2	\$420.00
05/05/2025	TJF	Review	Review defendant's records and notes in connection with the same.	\$800.00	3.6	\$2,880.00
05/06/2025	DD	Communicate	Communicate with expert and reschedule call.	\$350.00	0.2	\$70.00
05/07/2025	DD	Compile	Compile folder of only excel documents for expert.	\$350.00	2.6	\$910.00
05/09/2025	TJF	Prepare	Prepare for call with expert and conference with David Danning regarding the same and continued work reviewing defendant's documents.	\$800.00	3.7	\$2,960.00
05/12/2025	DD	Call	Call with expert.	\$350.00	0.4	\$140.00
05/12/2025	TJF	Prepare	Prepare for call with expert and call with expert and review data in and connection with the same.	\$800.00	4.6	\$3,680.00
05/13/2025	DD	Research	Research competing cases and status.	\$350.00	0.9	\$315.00
05/14/2025	DD	Prepare	Prepare and procure responses to expert questions, circulate call link.	\$350.00	0.5	\$175.00
05/14/2025	TJF	Review	Review time records produced by the defendant in PDF and notes in connection with the same.	\$800.00	6.4	\$5,120.00
05/20/2025	TJF	Prepare	Prepare for call with expert and review documents flagged by David Danning; continued work reviewing defendant's time and payroll data in pdf format and notes in connection with the same.	\$800.00	6.8	\$5,440.00
05/21/2025	TJF	Review	Review person most knowledgeable deposition and flagged documents by David Danning and conference with David Danning regarding the same.	\$800.00	4.2	\$3,360.00
05/22/2025	DD	Prepare	Prepare new links and document folder for expert.	\$350.00	0.2	\$70.00
05/23/2025	TJF	Review	Review pdf of time records produced by defendant and notes in connection with the same.	\$800.00	4.2	\$3,360.00
05/24/2025	DD	Prepare	Organize and upload files for expert.	\$350.00	1.2	\$420.00

05/27/2025	DD	Call	Prepare for and attend call with expert, upload additional files for expert.	\$350.00	0.7	\$245.00
05/27/2025	TJF	Prepare	Prepare for and conduct call with expert and continued work reviewing defendant's time and payroll records in pdf format.	\$800.00	4.9	\$3,920.00
05/29/2025	TJF	Review	Review policy documents and notes in connection with the same.	\$800.00	5.7	\$4,560.00
06/02/2025	DD	Call	Call with expert on numbers.	\$350.00	0.7	\$245.00
06/02/2025	TJF	Prepare	Prepare for call and conduct call with expert and conference with David Danning in connection with the same.	\$800.00	3.2	\$2,560.00
06/03/2025	TJF	Continue	Continued work reviewing employee payroll records and notes in connection with the same.	\$800.00	2.4	\$1,920.00
06/09/2025	TJF	Continue	Continued work reviewing employee payroll data, and conference with David Danning regarding the same.	\$800.00	3.8	\$3,040.00
06/11/2025	DD	Communicate	Confirm rescheduled call and circulate call in information.	\$350.00	0.1	\$35.00
06/12/2025	TJF	Work	Work reviewing defendants pay and time records.	\$800.00	2.6	\$2,080.00
06/16/2025	DD	Call	Call with expert on data.	\$350.00	1.1	\$385.00
06/16/2025	TJF	Prepare	Prepare for call and attend call with expert and David Danning; and work in connection with the same.	\$800.00	0.6	\$480.00
06/18/2025	DD	Revise	Revise and edit deposition notices.	\$350.00	0.7	\$245.00
06/18/2025	TJF	Review	Review and revise deposition notices and conference with David Danning regarding the same.	\$800.00	3.2	\$2,560.00
06/20/2025	DD	Revise	Revise deposition notices and send to defendant's counsel.	\$350.00	0.3	\$105.00
06/21/2025	TJF	Review	Review and revise discovery to propound and deposition notices.	\$800.00	1.1	\$880.00
06/22/2025	DD	Draft	Draft instructions for document review and organize file packets for reviewers.	\$350.00	1.1	\$385.00
06/23/2025	DD	Communicate	Communicate with expert.	\$350.00	0.2	\$70.00
06/23/2025	TJF	Review	Review correspondence to expert and review time and payroll records of aggrieved employees.	\$800.00	6.7	\$5,360.00
06/24/2025	DD	Communicate	Communicate with expert.	\$350.00	0.1	\$35.00
06/25/2025	DD	Call	Call with expert on data.	\$350.00	1.2	\$420.00
06/25/2025	DD	Review	Review master index, compile files, and distribute to reviewers and expert.	\$350.00	0.6	\$210.00
06/28/2025	DD	Prepare	Prepare timesheet documents for review.	\$350.00	1.1	\$385.00
06/29/2025	DD	Prepare	Prepare additional PDF timecards for reviewers.	\$350.00	2.4	\$840.00
06/30/2025	DD	Research	Further research into wage statement issues.	\$350.00	0.5	\$175.00
06/30/2025	TJF	Work	Continued work reviewing time and payroll records in PDF format for aggrieved employees.	\$800.00	4.4	\$3,520.00
07/01/2025	TJF	Review	Review and respond to email from plaintiff's attorney regarding deposition dates; prepare for case management conference and conferences with David Danning regarding the same; review time and payroll data.	\$800.00	4.8	\$3,840.00

07/02/2025	DD	Communicate	Communicate with defendant's counsel and draft joint case management statement.	\$350.00	0.3	\$105.00
07/02/2025	TJF	Review	Review time and payroll records and conference with David Danning in connection with the same.	\$800.00	3.3	\$2,640.00
07/07/2025	DD	Revise	Revise and edit joint report.	\$350.00	0.2	\$70.00
07/07/2025	TJF	Review	Review emails from plaintiff's attorney and prepare draft joint statement; conference with David Danning in regards to the same; and work in connection with preparing for individual depositions of company representatives.	\$800.00	4.8	\$3,840.00
07/08/2025	DD	Compile	Compile list of deposition dates, research ADR program.	\$350.00	0.4	\$140.00
07/08/2025	TJF	Review	Review time and payroll records; prepare for case management conference.	\$800.00	4.4	\$3,520.00
07/09/2025	DD	Attend	Prepare for and attend case management conference.	\$350.00	0.2	\$70.00
07/09/2025	TJF	Prepare	Prepare for case management conference and conference with David Danning regarding the same; review email from plaintiff's counsel regarding depositions of individual employees of the defendant.	\$800.00	1.6	\$1,280.00
07/10/2025	DD	Revise	Review and revise deposition notices.	\$350.00	0.2	\$70.00
07/10/2025	TJF	Review	Review deposition notices for individuals and prepare for defendant manager positions and revise the same.	\$800.00	2.7	\$2,160.00
07/11/2025	TJF	Review	Review emails from defense attorney and continued work reviewing time and payroll records.	\$800.00	1.8	\$1,440.00
07/14/2025	TJF	Conference	Conference with David Danning regarding depositions and mediation.	\$800.00	0.6	\$480.00
07/15/2025	TJF	Prepare	Prepare for depositions of four individual managers and work in connection with the same.	\$800.00	5.7	\$4,560.00
07/16/2025	DD	Prepare	Prepare deposition exhibits.	\$350.00	1.1	\$385.00
07/16/2025	DD	Research	Research court mediation deadline.	\$350.00	0.2	\$70.00
07/16/2025	TJF	Work	Work in connection with preparing for individual depositions.	\$800.00	3.6	\$2,880.00
07/17/2025	TJF	Review	Review correspondence from plaintiff's counsel regarding alternative dispute resolution conference with David Danning and regarding the same review defendant's records in preparation for individual depositions of the defendant's managers.	\$800.00	4.3	\$3,440.00
07/17/2025	TJF	Continue	Continue work reviewing time and payroll records and for preparation for the for individual depositions of defendant's managers.	\$800.00	2.8	\$2,240.00
07/21/2025	DD	Research	Research further into ADR program, call courthouse and judicial counsel.	\$350.00	0.8	\$280.00

07/21/2025	TJF	Prepare	Prepare for individual defendant's depositions; work reviewing time and payroll data and conference with David Danning in connection with the same.	\$800.00	3.9	\$3,120.00
07/22/2025	DD	Prepare	Prepare deposition exhibits for all depositions.	\$350.00	6.3	\$2,205.00
07/22/2025	TJF	Review	Review correspondence to defense counsel and responses to the same regarding alternative dispute resolution; continued work reviewing defendant's time and payroll data and work in connection with preparing for individual depositions.	\$800.00	5.6	\$4,480.00
07/22/2025	DD	Communicate	Communicate with defendant's counsel regarding ADR options and person most knowledgeable depositions.	\$350.00	0.2	\$70.00
07/23/2025	DD	Communicate	Communicate with mediators regarding availability.	\$350.00	0.2	\$70.00
07/23/2025	TJF	Prepare	Preparing for corporate depositions.	\$800.00	6.2	\$4,960.00
07/25/2025	TJF	Work	Work in connection with preparing for corporate depositions.	\$800.00	5.7	\$4,560.00
07/28/2025	DD	Communicate	Communicate with mediators.	\$350.00	0.2	\$70.00
07/28/2025	DD	Prepare	Create deposition exhibits.	\$350.00	0.3	\$105.00
07/28/2025	TJF	Prepare	Prepare for corporate depositions.	\$800.00	6.6	\$5,280.00
07/29/2025	DD	Research	Research trial deadlines.	\$350.00	0.8	\$280.00
07/29/2025	DD	Support	Support deposition of Cindy Magana.	\$350.00	0.2	\$70.00
07/29/2025	TJF	Prepare	Prepare for and take deposition of branch manager Cindy Magana and conferences with David Danning regarding the same.	\$800.00	5.5	\$4,400.00
07/30/2025	DD	Communicate	Confirm depositions will go forward.	\$350.00	0.2	\$70.00
07/31/2025	DD	Review	Review timecard documents.	\$350.00	0.8	\$280.00
07/31/2025	TJF	Prepare	Prepare for branch manager depositions and take depositions of Elizabeth Carrera; conferences with David Danning connection with the same.	\$800.00	6.2	\$4,960.00
08/01/2025	TJF	Prepare	Prepare for and take branch manager deposition of Elizabeth Duran.	\$800.00	5.8	\$4,640.00
08/02/2025	DD	Review	Document review for depositions.	\$350.00	6.2	\$2,170.00
08/04/2025	DD	Review	Document review for depositions.	\$350.00	0.6	\$210.00
08/06/2025	TJF	Prepare	Prepare for deposition of regional VP Lulu Romero, and conferences with David Danning regarding the same.	\$800.00	3.2	\$2,560.00
08/07/2025	DD	Review	Document review for depositions	\$350.00	1.2	\$420.00
08/08/2025	DD	Review	Document review for depositions	\$350.00	0.7	\$245.00
08/08/2025	TJF	Review	Review correspondence from defense counsel regarding depositions.	\$800.00	0.2	\$160.00
08/11/2025	DD	Communicate	Communicate with defendant's counsel to confirm deposition.	\$350.00	0.1	\$35.00
08/11/2025	DD	Prepare	Prepare additional deposition exhibit.	\$350.00	0.2	\$70.00
08/11/2025	TJF	Prepare	Prepare for deposition of Lulu Romero.	\$800.00	4.2	\$3,360.00
08/12/2025	TJF	Prepare	Prepare for and take deposition of Lulu Romero, and conferences with David Danning regarding the same.	\$800.00	6.3	\$5,040.00

08/13/2025	DD	Draft	Draft and revise requests for admissions, research authenticating documents via requests for admissions.	\$350.00	1.6	\$560.00
08/14/2025	DD	Communicate	Communicate with expert to set up a call.	\$350.00	0.1	\$35.00
08/14/2025	DD	Review	Document review.	\$350.00	0.6	\$210.00
08/15/2025	DD	Review	Document review.	\$350.00	1.5	\$525.00
08/16/2025	DD	Review	Document review.	\$350.00	1.7	\$595.00
08/19/2025	DD	Call	Call with expert.	\$350.00	1.3	\$455.00
08/19/2025	DD	Draft	Prepare trial materials.	\$350.00	0.3	\$105.00
08/19/2025	TJF	Review	Review complaint and conference with David Danning regarding the same.	\$800.00	0.3	\$240.00
08/19/2025	TJF	Work	Continue work reviewing PDF of time and payroll records; prepare for call with expert and conferences with David Danning regarding the same.	\$800.00	4.2	\$3,360.00
08/20/2025	DD	Research	Research place of depositions for foreign deponents.	\$350.00	0.7	\$245.00
08/21/2025	DD	Draft	Draft supplemental discovery requests.	\$350.00	0.4	\$140.00
08/21/2025	TJF	Review	Review time and payroll data for violations and conferences with David Danny regarding same.	\$800.00	6.1	\$4,880.00
08/22/2025	DD	Revise	Revise and edit dsccovery to be propunded.	\$350.00	0.8	\$280.00
08/22/2025	DD	Review	Document review.	\$350.00	2.3	\$805.00
08/25/2025	DD	Review	Document review.	\$350.00	0.8	\$280.00
08/25/2025	TJF	Prepare	Prepare for person most knowledgeable depositions, and review and revise emails to defense counsel regarding the same.	\$800.00	4.6	\$3,680.00
08/26/2025	DD	Revise	Draft and revise amended deposition notices.	\$350.00	0.4	\$140.00
08/27/2025	DD	Research	Research expert report requirements.	\$350.00	1.1	\$385.00
08/27/2025	TJF	Review	Review and revise continued deposition notices for person most knowledgeable and prepare for call with expert.	\$800.00	3.9	\$3,120.00
08/28/2025	DD	Call	Call with expert, submission of pleadings materials for report.	\$350.00	1.4	\$490.00
08/28/2025	DD	Review	Document review.	\$350.00	0.8	\$280.00
08/28/2025	TJF	Work	Continued work reviewing PDF of time and payroll records and conferences with David Danning regarding same.	\$800.00	3.7	\$2,960.00
08/29/2025	DD	Call	Call with expert regarding report.	\$350.00	0.6	\$210.00
08/31/2025	DD	Call	Call with expert.	\$350.00	0.8	\$280.00
08/31/2025	DD	Research	Research penalties for meal periods, LC 226.7 vs. 512, and records violations penalties.	\$350.00	1.3	\$455.00
08/31/2025	TJF	Review	Review corporate depositions in preparation for trial.	\$800.00	2.4	\$1,920.00
09/01/2025	TJF	Prepare	Prepare for call with expert and David Danning regarding damage the case.	\$800.00	0.8	\$640.00
09/02/2025	DD	Communicate	Communicate with expert regarding report, call with expert.	\$350.00	1.6	\$560.00

09/02/2025	DD	Review	Document review.	\$350.00	0.7	\$245.00
09/02/2025	TJF	Work	Continued work regarding damage calculations and models and review depositions of managers and conference with David Danning regarding the same.	\$800.00	3.9	\$3,120.00
09/03/2025	DD	Review	Document review.	\$350.00	1.2	\$420.00
09/03/2025	TJF	Review	Review defendant's records in preparation for damages analysis and trial.	\$800.00	7.7	\$6,160.00
09/04/2025	TJF	Review	Review deposition transcripts in preparation for trial.	\$800.00	5.2	\$4,160.00
09/05/2025	DD	Review	Document review.	\$350.00	1.5	\$525.00
09/08/2025	DD	Review	Document review.	\$350.00	0.4	\$140.00
09/08/2025	TJF	Review	Review exposure report and work in connection pair for trial.	\$800.00	4.6	\$3,680.00
09/09/2025	TJF	Work	Work reviewing defendant's depositions for trial and preparation of outline.	\$800.00	4.9	\$3,920.00
09/09/2025	TJF	Prepare	Prepare trial outline.	\$800.00	5.6	\$4,480.00
09/11/2025	TJF	Review	Review and summarize person most knowledgeable deposition transcript and notes in connection with the same; prepare outline for trial.	\$800.00	6.3	\$5,040.00
09/15/2025	DD	Prepare	Begin preparing trial documents.	\$350.00	0.7	\$245.00
09/15/2025	DD	Review	Document review.	\$350.00	0.2	\$70.00
09/16/2025	TJF	Prepare	Prepare outline for trial.	\$800.00	5.2	\$4,160.00
09/17/2025	DD	Research	Research whether any supplemental expert designation must provide a report and the allowable scope of that designation.	\$350.00	0.6	\$210.00
09/19/2025	DD	Review	Document review for trial.	\$350.00	0.8	\$280.00
09/22/2025	DD	Review	Document review for trial.	\$350.00	4.1	\$1,435.00
09/23/2025	DD	Review	Review discovery responses recieved from defendant.	\$350.00	0.2	\$70.00
09/23/2025	DD	Communicate	Communicate with expert regarding deposition notice.	\$350.00	0.1	\$35.00
09/23/2025	DD	Create	Prepare exhibits for person most knowlegeable depositions.	\$350.00	3.6	\$1,260.00
09/23/2025	TJF	Prepare	Prepare for person most knowledgeable deposition and review notice from defense counsel.	\$800.00	8.7	\$6,960.00
09/24/2025	DD	Draft	Draft and revise response to settlement demand.	\$350.00	1.3	\$455.00
09/24/2025	DD	Draft	Draft and revise notice of expert deposition, meet and confer letter regarding discovery responses, and letter regarding expert deposition.	\$350.00	1.3	\$455.00
09/24/2025	DD	Review	Document review.	\$350.00	1.7	\$595.00
09/24/2025	TJF	Work	Work in connection with preparation for trial and person most knowledgeable deposition.	\$800.00	9.3	\$7,440.00
09/25/2025	DD	Call	Call with expert.	\$350.00	0.4	\$140.00
09/25/2025	DD	Revise	Revise and edit response to demand for settlement.	\$350.00	0.6	\$210.00

09/25/2025	DD	Prepare	Prepare additional exhibits for person most knowledgeable depositions, document review.	\$350.00	3.2	\$1,120.00
09/25/2025	TJF	Prepare	Prepare for person most knowledgeable deposition and conference with David Danning regarding the same; prepare for and conduct call with expert.	\$800.00	6.7	\$5,360.00
09/26/2025	TJF	Prepare	Prepare for person most knowledgeable deposition and continued deposition of Bryan Smith; review correspondence from defense counsel and prepare response to the same.	\$800.00	9.6	\$7,680.00
09/26/2025	DD	Prepare	Prepare additional exhibits for depositions.	\$350.00	2.1	\$735.00
09/26/2025	DD	Communicate	Communicate with deposition providers for remote appearance link for documents.	\$350.00	0.6	\$210.00
09/26/2025	DD	Revise	Revise and edit settlement communication.	\$350.00	0.4	\$140.00
09/27/2025	TJF	Prepare	Prepare for person most knowledgeable deposition and continued deposition of Bryan Smith.	\$800.00	6.9	\$5,520.00
09/28/2025	TJF	Prepare	Prepare for person most knowledgeable deposition and continued deposition of Bryan Smith.	\$800.00	4.6	\$3,680.00
09/29/2025	DD	Draft	Draft and revise plaintiff's portion of the joint report before the final status conference.	\$350.00	1.3	\$455.00
09/29/2025	DD	Prepare	Prepare additional exhibits for depositions, answer questions necessary for deposition strategy.	\$350.00	3.4	\$1,190.00
09/30/2025	DD	Attend	Attend resumed deposition of Bryan Smith.	\$350.00	1.2	\$420.00
09/30/2025	DD	Communicate	Communicate with expert.	\$350.00	0.1	\$35.00
10/01/2025	DD	Attend	Attend deposition of defendant's time and payroll person most knowledgeable.	\$350.00	2.8	\$980.00
10/01/2025	DD	Revise	Revise and edit plaintiff's portion of the case management statement.	\$350.00	0.6	\$210.00
10/01/2025	DD	Review	Document review.	\$350.00	1.3	\$455.00
10/01/2025	TJF	Prepare	Prepare for and take person most knowledgeable deposition.	\$800.00	7.4	\$5,920.00
10/02/2025	TJF	Work	Work in connection with preparing for trial.	\$800.00	5.6	\$4,480.00
10/03/2025	DD	Communicate	Communicate with plaintiff's counsel regarding joint report.	\$350.00	0.1	\$35.00
10/03/2025	DD	Research	Research document requests for defendant's expert.	\$350.00	0.5	\$175.00
10/03/2025	DD	Draft	Draft amended notice of expert deposition and request for production.	\$350.00	1.0	\$350.00
10/03/2025	DD	Create	Exhibit creation.	\$350.00	1.2	\$420.00
10/03/2025	DD	Revise	Revise and edit report for case management conference.	\$350.00	0.4	\$140.00
10/03/2025	TJF	Prepare	Prepare for trial and return travel from person most knowledgeable deposition in New York.	\$800.00	7.3	\$5,840.00
10/06/2025	DD	Draft	Research and draft motion in limine, conference with Torey Favarote about motions in limine.	\$350.00	1.3	\$455.00
10/06/2025	DD	Prepare	Preperations and data collection for case management conference.	\$350.00	0.9	\$315.00
10/06/2025	DD	Research	Research record keeping PAGA violations and caselaw.	\$350.00	1.1	\$385.00

10/06/2025	TJF	Prepare	Prepare for case management conference and trial; and deposition of defendant's expert.	\$800.00	7.6	\$6,080.00
10/07/2025	DD	Attend	Attend hearing for case management conference.	\$350.00	1.3	\$455.00
10/07/2025	DD	Communicate	Communicate with client regarding last minute settlement conference.	\$350.00	0.1	\$35.00
10/07/2025	DD	Draft	Draft and revise settlement conference statement.	\$350.00	6.9	\$2,415.00
10/07/2025	TJF	Prepare	Prepare for and attend case management conference and prepare brief for mandatory settlement conference; conferences with David Danning regarding the same.	\$800.00	8.3	\$6,640.00
10/07/2025	TJF	Prepare	Prepare for trial, and mandatory settlement conference brief.	\$800.00	8.7	\$6,960.00
10/08/2025	DD	Revise	Revise and edit settlement conference statement, prepare exhibits.	\$350.00	4.9	\$1,715.00
10/08/2025	DD	Draft	Draft notice to attend trial.	\$350.00	0.3	\$105.00
10/08/2025	DD	Draft	Draft stipulation to trifurcate trial.	\$350.00	0.8	\$280.00
10/08/2025	DD	Create	Create and assemble MSC binders.	\$350.00	2.4	\$840.00
10/08/2025	TJF	Prepare	Prepare for mandatory settlement conference and damage data review; work preparing for expert deposition defense.	\$800.00	6.2	\$4,960.00
10/09/2025	DD	Review	Document review and exhibit creation.	\$350.00	1.1	\$385.00
10/09/2025	DD	Create	Create additional materials for MSC, generate extrapolations.	\$350.00	2.3	\$805.00
10/09/2025	DD	Support	Support MSC with case authority, documents, and information.	\$350.00	2.2	\$770.00
10/09/2025	DD	Draft	Begin drafting exhibit and witness lists.	\$350.00	1.1	\$385.00
10/09/2025	TJF	Prepare	Prepare for and attend mandatory settlement conference and related travel to and from the court.	\$800.00	5.6	\$4,480.00
10/13/2025	DD	Research	Research final approval procedures.	\$350.00	1.0	\$350.00
10/13/2025	TJF	Conference	Conference with David Danning regarding the settlement.	\$800.00	0.4	\$320.00
10/14/2025	DD	Draft	Draft motion for approval of PAGA settlement.	\$350.00	0.6	\$210.00
10/16/2025	DD	Call	Call department S-17 to obtain transcript of settlement.	\$350.00	0.2	\$70.00
10/16/2025	TJF	Review	Review minute order from the Court.	\$800.00	0.1	\$80.00
10/17/2025	DD	Call	Continue to call department S-17, fill out and submit for for audio recording.	\$350.00	0.2	\$70.00
10/17/2025	DD	Draft	Begin drafting motion for PAGA approval.	\$350.00	0.6	\$210.00
10/20/2025	DD	Draft	Begin drafting motion for preliminary approval.	\$350.00	4.4	\$1,540.00
10/22/2025	TJF	Review	Review and revise draft of the settlement agreement.	\$800.00	2.3	\$1,840.00
11/12/2025	TJF	Prepare	Prepare correspondence to defense counsel regarding missing data.	\$800.00	0.2	\$160.00
11/18/2025	TJF	Review	Review and revise settlement agreement.	\$800.00	2.8	\$2,240.00
11/25/2025	DD	Revise	Revise and edit settlement agreement.	\$350.00	0.3	\$105.00

11/26/2025	TJF	Prepare	Prepare correspondence to defense counsel regarding missing data for employees and draft longform agreement.	\$800.00	0.2	\$160.00
12/12/2025	TJF	Follow up	Follow-up email to defense counsel regarding status of data noted in settlement agreement and status of longform agreement.	\$800.00	0.2	\$160.00
12/18/2025	TJF	Prepare	Prepare motion for approval of PAGA settlement and supporting documents.	\$800.00	0.4	\$320.00
01/02/2026	TJF	Follow up	Follow-up email to defense counsel on status of data in agreement and the longform agreement.	\$800.00	0.2	\$160.00
01/12/2026	TJF	Prepare	Prepare correspondence to defense counsel regarding status of longform agreement and required data, and review and revise draft agreement.	\$800.00	4.2	\$3,360.00
01/15/2026	DD	Draft	Draft declaration of Maria Reyes.	\$350.00	0.7	\$245.00
01/15/2026	DD	Draft	Draft PAGA notice to go out with checks.	\$350.00	0.5	\$175.00
01/15/2026	DD	Draft	Draft and revise motion for preliminary approval.	\$350.00	3.1	\$1,085.00
01/15/2026	TJF	Review	Review and revise draft motion for approval of PAGA settlement and supporting documents.	\$800.00	4.4	\$3,520.00
01/16/2026	TJF	Review	Review and revise supporting declarations and motion for approval of PAGA settlement.	\$800.00	4.9	\$3,920.00
01/21/2026	TJF	Review	Review and revise motion for approval of PAGA settlement.	\$800.00	4.5	\$3,600.00
01/22/2026	TJF	Review	Review and finalize motion for approval of PAGA settlement.	\$800.00	3.7	\$2,960.00
Totals:					1049.0	\$691,232.50

Expenses

DATE	EE	ACTIVITY	DESCRIPTION	COST	QUANTITY	LINE TOTAL
04/11/2023	TS	Filing Fee	PAGA filing fee.	\$75.00	1.0	\$75.00
08/01/2023	TS	Court Filing Fee	Court filing fee regarding first appearance and complex fee on behalf of Maria Reyes. Bosco invoice No. 59291049.	\$1,578.50	1.0	\$1,578.50
08/03/2023	TS	Attorney Service Fee	Attorney service fee regarding service of summons and complaint on Lyneer Staffing Solutions, LLC. Ace order No. 2215716.	\$162.00	1.0	\$162.00
08/15/2023	TS	Attorney Service Fee	Attorney service fee regarding filing of peremptory challenge. Bosco invoice No. 9375614.	\$134.95	1.0	\$134.95
08/21/2023	TS	Copy Fees	Copying/Printing.	\$0.06	181.0	\$10.86
08/22/2023	TS	Attorney Service Fee	Attorney service fee regarding service of discovery requests on Lyneer Staffing. Ace order No. 2222285.	\$194.19	1.0	\$194.19
10/23/2023	TS	Copy Fees	Copying/Printing.	\$0.06	119.0	\$7.14
11/01/2023	TS	Copy Fees	Copying/Printing.	\$0.06	233.0	\$13.98
11/02/2023	TS	Copy Fees	Copying/Printing.	\$0.06	396.0	\$23.76
11/06/2023	TS	Attorney Service Fee	Attorney service regarding filing of Motion to compel and supporting documents. One Legal invoice No. 15022431.	\$19.20	1.0	\$19.20
11/06/2023	TS	Court Filing Fee	Court Filing fee regarding motion to compel.	\$265.25	1.0	\$265.25

11/15/2023	TS	Attorney Service Fee	Delivery of mandatory Judge's courtesy copy. One Legal invoice No. 15045417.	\$75.00	1.0	\$75.00
01/08/2024	TS	Copy Fees	Copying/Printing.	\$0.06	175.0	\$10.50
01/09/2024	TS	Copy Fees	Copying/Printing.	\$0.06	221.0	\$13.26
01/22/2024	TS	Attorney Service Fee	Attorney Service fee regarding filing of notice. One Legal invoice No. 15220836.	\$20.09	1.0	\$20.09
02/29/2024	TS	Court Filing Fee	Court filing fee of jury fees. One Legal invoice No. 15345707.	\$150.00	1.0	\$150.00
02/29/2024	TS	Attorney Service Fee	Attorney service regarding filing of notice of posting jury fees. One Legal invoice No. 15345707.	\$20.20	1.0	\$20.20
04/04/2024	TS	Attorney Service Fee	Attorney service regarding filing of notice of ruling. One Legal invoice no. 15454311.	\$20.09	1.0	\$20.09
04/17/2024	TS	Copy Fees	Copying/Printing.	\$0.06	65.0	\$3.90
04/23/2024	TS	Attorney Service Fee	Attorney service fee regarding filing of notice. One Legal invoice No. 15514059.	\$20.09	1.0	\$20.09
05/06/2024	TS	Attorney Service Fee	Attorney service regarding filing of joint discovery case management statement. Bosco invoice # 10996636.	\$109.95	1.0	\$109.95
05/13/2024	TS	Copy Fees	Copying/Printing.	\$0.06	349.0	\$20.94
05/21/2024	TS	Copy Fees	Copying/Printing.	\$0.06	93.0	\$5.58
06/07/2024	TS	Deposition Transcription Fee	Certified transcript of deposition of person most knowledgeable at Lyneer Staffing Solutions. Lexitas invoice No. 405435.	\$2,199.51	1.0	\$2,199.51
01/10/2025	TS	Attorney Service Fee	Hand service of notices of deposition. Ace order No. 2402184.	\$154.63	1.0	\$154.63
01/10/2025	TS	Copy Fees	Copying/Printing.	\$0.06	111.0	\$6.66
01/11/2025	TJF	Hotel Fees	Hotel for Plaintiff's deposition.	\$274.06	1.0	\$274.06
01/16/2025	TJF	Hotel Fees	Hotel for Plaintiff's deposition for Torey Favarote.	\$183.70	1.0	\$183.70
01/22/2025	TS	Copy Fees	Copying/Printing.	\$0.06	201.0	\$12.06
02/02/2025	TS	Deposition Transcription Fee	Deposition of Maria Reyes. Steno invoice No. 1437318.	\$3,141.70	1.0	\$3,141.70
02/06/2025	TS	Attorney Service Fee	Filing of Joint Report. Bosco Legal Services invoice No. 12645579.	\$119.95	1.0	\$119.95
02/07/2025	TS	Deposition Transcription Fee	Deposition of Maria Reyes Vol. II. Steno invoice No. 1451826.	\$2,259.35	1.0	\$2,259.35
03/12/2025	TS	Attorney Service Fee	Filing of informal discovery conference report. Bosco Legal Services invoice No. 12865363.	\$119.95	1.0	\$119.95
05/14/2025	TS	Court Copy Fee	Purchase of Court documents. SBSC Order ID CIVIL70317936.	\$8.62	1.0	\$8.62
07/08/2025	TS	Attorney Service Fee	Filing of joint report. Magna Legal Services invoice No. 13668755.	\$119.95	1.0	\$119.95
07/10/2025	TS	Copy Fees	Copying/Printing.	\$0.06	73.0	\$4.38
07/21/2025	TS	Claims Administrator	Apex Class Action LLC invoice No. 15992003 regarding Belaire-West notice.	\$14,712.07	1.0	\$14,712.07
07/28/2025	TS	Copy Fees	Copying/Printing.	\$0.06	317.0	\$19.02
07/30/2025	TS	Copy Fees	Copying/Printing.	\$0.06	245.0	\$14.70
07/31/2025	TS	Copy Fees	Copying/Printing.	\$0.06	196.0	\$11.76

08/11/2025	TS	Copy Fees	Copying/Printing.	\$0.06	238.0	\$14.28
08/21/2025	TJF	Airfare	Flight to New York to take person most knowledgeable depositions. Delta Flight receipt No. 0062358935805.	\$2,351.97	1.0	\$2,351.97
08/22/2025	TS	Copy Fees	Copying/Printing.	\$0.06	51.0	\$3.06
08/26/2025	TS	Deposition Transcription Fee	Certified transcript of deposition of Cindy Aguirre. Lexitas invoice No. 447466.	\$989.85	1.0	\$989.85
08/27/2025	TS	Deposition Transcription Fee	Certified transcript of deposition of Elizabeth Carrera. Lexitas invoice No. 447669.	\$984.00	1.0	\$984.00
08/28/2025	TS	Deposition Transcription Fee	Certified transcript of deposition of Elizabeth Duran. Lexitas invoice No. 447776.	\$984.00	1.0	\$984.00
09/03/2025	TS	Data Entry	Paper and handwritten timecard data entry costs.	\$5,662.03	1.0	\$5,662.03
09/08/2025	TS	Deposition Transcription Fee	Certified transcript of deposition of Lourdes Romero. Lexitas Invoice No. 448767.	\$984.00	1.0	\$984.00
09/29/2025	TJF	Cabfare	Cab to hotel in New York for person most knowledgeable deposition.	\$105.00	1.0	\$105.00
09/29/2025	TS	Copy Fees	Copying/Printing.	\$0.06	284.0	\$17.04
09/30/2025	TJF	Cabfare	Cab to deposition in New York for person most knowledgeable deposition.	\$30.00	1.0	\$30.00
09/30/2025	TJF	Cabfare	Cab from deposition in New York for person most knowledgeable deposition.	\$31.00	1.0	\$31.00
09/30/2025	TS	Copy Fees	Copying/Printing.	\$0.06	163.0	\$9.78
10/01/2025	TJF	Cabfare	Cab from deposition in New York for person most knowledgeable deposition.	\$31.00	1.0	\$31.00
10/01/2025	TJF	Cabfare	Cab to deposition in New York for person most knowledgeable deposition.	\$30.00	1.0	\$30.00
10/02/2025	TJF	Hotel Fees	Hotel in New York for person most knowledgeable deposition.	\$1,816.73	1.0	\$1,816.73
10/02/2025	TJF	Cabfare	Cab to JFK after deposition.	\$110.00	1.0	\$110.00
10/08/2025	TS	Deposition Videographer Fee	Videographer regarding 9/30/25 deposition of Bryan Smith, person most knowledgeable at Lyneer Staffing. Lexitas invoice No. 452064.	\$787.50	1.0	\$787.50
10/08/2025	TS	Deposition Videographer Fee	Videographer regarding 10/1/25 deposition of Bryan Smith, person most knowledgeable at Lyneer Staffing. Lexitas invoice No. 452062.	\$843.75	1.0	\$843.75
10/08/2025	TS	Attorney Service Fee	Filing of report in advance of status conference. Magna Legal Services invoice No. 14297203.	\$119.95	1.0	\$119.95
10/15/2025	TS	Deposition Transcription Fee	Certified transcript of 9/30/25 deposition of Bryan Smith, person most knowledgeable. Lexitas Invoice No. 452802.	\$1,557.80	1.0	\$1,557.80
10/15/2025	TS	Deposition Transcription Fee	Certified transcript of 10/1/25 deposition of Bryan Smith, person most knowledgeable. Lexitas invoice No. 452526.	\$1,394.00	1.0	\$1,394.00
10/23/2025	TS	Attorney Service Fee	Procuring of audio recording of settlement reached at mandatory settlement conference. Magna Legal Services invoice No. 14396974.	\$94.45	1.0	\$94.45
10/23/2025	TS	Expert Witness Fee	Expert witness analysis of liability. JTC Corporation invoice No. 251004.	\$7,450.00	1.0	\$7,450.00

12/16/2025	TS	Transcription Fees	Transcribing of audio recording of settlement reached at mandatory settlement conference. eScribers transaction ID 81367875536.	\$92.00	1.0	\$92.00
01/23/2026	TS	Attorney Service Fee	Magna Legal Services fee for delivery of courtesy copy of motion for approval of PAGA settlement papers to Department S33 of the San Bernardino Superior Court.	\$119.95	1.0	\$119.95
01/23/2026	TS	Filing Fee	San Bernardino Superior Court filing fee regarding motion for approval of PAGA settlement.	\$60.00	1.0	\$60.00
01/23/2026	TS	Attorney Service Fee	One Legal fee for electronic filing and service of motion for approval of PAGA settlement.	\$30.00	1.0	\$30.00
01/23/2026	TS	Copy Fees	Copying/Printing.	\$0.06	483.0	\$28.98
Expense Total:						\$53,048.62

Time Entry Sub-Total:	\$691,232.50
Expense Sub-Total:	\$53,048.62
Sub-Total:	\$744,281.12
Total:	\$744,281.12
Amount Paid:	\$0.00
BALANCE DUE:	\$744,281.12

PROOF OF SERVICE

I, Thomas Steinhart, declare:

I am and was at the time of the service mentioned in this declaration, employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within action. My business address is Gleason & Favarote, LLP, 3646 Long Beach Blvd., Suite 203, Long Beach, CA 90807.

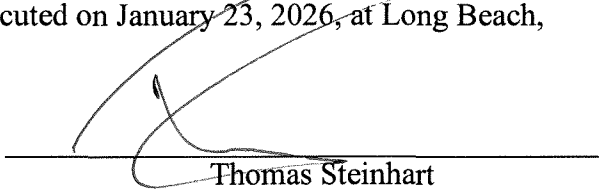
On January 23, 2026, I served a copy(ies) of the following document(s):

DECLARATION OF TOREY JOSEPH FAVAROTE IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF PAGA ACTION SETTLEMENT; APPOINTMENT OF SETTLEMENT ADMINISTRATOR; APPROVAL OF PAGA NOTICE; APPROVAL OF ENHANCEMENT AWARD; AND APPROVAL OF ATTORNEYS' FEES AND COSTS
on the parties to this action as follows:

Attorney	Party(ies) Served	Method of Service
Stacey M. Cooper, Esq. STACEY COOPER LAW, PC 888 Prospect Street, Suite 200 La Jolla, CA 92037 Phone: 619-673-5022 stacey@cooperlawpc.com corbyns@cooperlawpc.com sandra@cooperlawpc.com	Lyneer Staffing Solutions, LLC	One Legal, LLC

- ☐ [BY OVERNIGHT COURIER] I caused the sealed envelope(s) to be delivered by a commercial courier service for overnight delivery to the offices of the addressee(s).
- ☐ [BY HAND] I directed the sealed envelope(s) to the party(ies) so designated on the service list to be delivered by Ace Attorney Service, Inc. this date.
- ☒ [BY DESIGNATED ELECTRONIC FILING SERVICE] I hereby certify that the above-referenced document(s) were served electronically on the parties listed herein at their most recent known email address or email of record by submitting an electronic version of the document(s) to One Legal, LLC, through the user interface at www.onelegal.com.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that this declaration was executed on January 23, 2026, at Long Beach, California.


Thomas Steinhart