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Attorneys for Plaintiffs, on a representative basis
and on behalf of all others similarly situated

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

VICTOR MEDINA and FRANCISCO
CRUZ, individually, on a representative
basis, and on behalf of all others similarly
situated;

Plaintiff,

vs.

HOWARD ROOFING COMPANY, INC.,
a California Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: CIVSB2312233
*[Assigned to Hon. Jessica Morgan, Dept S26, for
all purposes]*

**DECLARATION OF DANIEL J. HYUN IN
SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing

Date: November 4, 2024
Time: 8:30 a.m.
Dept.: S26

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1. I am an attorney at law licensed to practice before all courts in the State of California and the Ninth Circuit Court of Appeals. I am a partner at Torus LLP, counsel for Plaintiffs Victor Medina and Francisco Cruz (collectively “Plaintiffs”) in this matter. I am thoroughly familiar with and have personal knowledge of all of the facts set forth herein and if called and sworn as a witness, I could and would competently testify under oath thereto. I submit this declaration in support of Plaintiffs’ Unopposed Motion for Final Approval of Class Action Settlement.

3. The attorneys working on this case have been appointed class counsel in many cases, through both contested motions and settlement approval motions.

4. I have been appointed class counsel and/or had my attorney's fees approved in at least the following class actions and/or representative PAGA actions: *Bedoy v. ATN Window and Door Corp. et al.*, Case No. CIVRS1307735 (San Bernardino County Superior Court) – \$235,000.00 wage and hour class action settlement on behalf of non-exempt manufacturing and construction employees; *Bronson v. Mohammad Reza Neal, M.D., Inc.*, Case No. 30-2016-00860352-CU-OE-CXC (Orange County Superior Court) – \$300,000.00 wage and hour class action settlement on behalf of non-exempt employees working in the medical industry; *Cruz v. Nason Roofing, Inc.*, Orange County Superior Court Case No. 30-2021-01235276-CU-OE-CXC (Orange County Superior Court) - \$100,000.00 wage and hour class action settlement on behalf of non-exempt construction workers; *Duarte v. Arriaga USA, Inc.*, Case No. 21STCV14446 (Los Angeles County Superior Court) - \$123,856.09 wage and hour class action settlement; *Garcia v. Miquel Cuevas et al.*, Case No. HG13701393 (Alameda County Superior Court) –

1 \$1,300,000.00 wage and hour class action settlement on behalf of delivery drivers misclassified
2 as independent contractors; *Garcia v. Unifirst Corporation*, Case No. 21STCV41324 (Los
3 Angeles County Superior Court) - \$688,401.30 PAGA settlement; *Guardado v. Millennium*
4 *Reinforcing, Inc.*, Case No. 20STCV39672 (Los Angeles County Superior Court) - \$263,550
5 PAGA settlement; *Hale v. Orange County Rescue Mission, Inc.*, Case No. 30-2018-00970414-
6 CU-OE-CXC (Orange County Superior Court) – \$300,000.00 wage and hour class action
7 settlement on behalf of non-exempt hourly employees; *In re: Hacor Wage and Hour*
8 *Employment Practices Litigation*, Case No. BC522220 (Los Angeles County Superior Court) –
9 \$3,000,000.00 wage and hour class action settlement on behalf of non-exempt managers and
10 other employees in the food catering and distribution industry; *Martinez v. Market Driven, LLC*,
11 Case No. 19STCV38888 (Los Angeles Superior Court) - \$61,000.00 PAGA settlement on
12 behalf of catering employees; *Martinez v. L.A.R.K. Industries, Inc.*, Case No. 30-2019-
13 01110981-CU-OE-CXC (Orange County Superior Court) - \$800,000.00 wage and hour class
14 action settlement on behalf of construction workers; *Orozco v. Fleetwood Aluminum Products,*
15 *Inc.*, Case No. RIC1703488 (Riverside County Superior Court) – \$685,000.00 wage and hour
16 class action settlement on behalf of non-exempt employees working in the manufacturing
17 industry; *Osuna v. J&A Rents & Sells, Inc.*, Case No. BC536586 (Los Angeles County Superior
18 Court) – \$450,000.00 wage and hour class action settlement on behalf of non-exempt employees
19 working in the party rental industry; *Reese v. SGM, Inc. et al.*, Case No. CIVSB2106217 –
20 \$595,000 class action settlement on behalf of non-exempt employees; *Reyes v. PSLQ, Inc.*, Case
21 No. MCC1400703 (Riverside County Superior Court) – \$75,000.00 wage and hour class action
22 settlement on behalf of construction yard employees; *Romero v. Delivery Drivers, Inc. et al.*,
23 Case No. 30-2015-00774687-CU-OE-CXC (Orange County Superior Court) – \$535,000.00
24 wage and hour class action settlement on behalf of misclassified delivery drivers; and *Rojas v.*
25 *Constellation Homebuilder Systems, Inc.*, Case No. 37-2019-00035229-CU-OE-CTL (San
26 Diego Superior Court) - \$1,350,000.00 wage and hour class action settlement on behalf of
27 salespersons; *Rosas v. Sierra Pacific Refrigerated Services, LLC et al.*, Case No. CV-21-003621
28 (Stanislaus County Superior Court) - \$280,000.00 class action settlement; *Ruiz v. Lion Foods,*

Case No. 21CV386961 (Santa Clara County Superior Court) – 190,000.00 class action settlement; *Saenz v. Class Leasing*, Case No. CVRI2205259 (Riverside County Superior Court) - 425,000.00 class action settlement; *Sheppard v. Bekins Moving Solutions, Inc.*, Case No. 21STCV44484 (Los Angeles County Superior Court) - \$195,000.00.

5. All cases cited above were successfully resolved for the classes and/or aggrieved employees.

6. I served as plaintiffs’ counsel of record in the following cases in which the courts granted plaintiffs’ motion for class certification: *Gamboa v. Kamran Staffing Inc. et al.*, Case No. CIVDS1605273 (San Bernardino County Superior Court) and *Grant et al. v. Car Spa, Inc.*, Case No. RIC1310176 (Riverside County Superior Court).

7. In addition to the cases cited above, I served as plaintiffs’ counsel of record in at least the following employment class actions, consumer class actions, and/or representative actions in state or federal court: *Alix v. House of Imports*, Case No. 30-2017-00965169-CU-OE-CXC (Orange County Superior Court); *Boyack v. Salon Management Corp. et al.*, Case No. 8:18-cv-01233 (Central District of California); *Cardena v. Currency Capital, LLC*, Case No. 30-2018-01041233-CU-OE-CXC (Orange County Superior Court); *Carranza v. Southern California Discount Tire Co., Inc.*, Case No. 30-2018-01016028-CU-OE-CXC (Orange County Superior Court); *Cox v. Cuttwood, LLC et al.*, Case No. 30-2016-00838588 (Orange County Superior Court); *Crandall v. Maxim Healthcare Services, Inc.*, Case No. 30-2017-00940239-CU-OE-CXC (Orange County Superior Court); *Delgado v. Desert Concepts Construction, Inc.*, Case No. PSC1603866 (Riverside County Superior Court); *Fajardo v. Centaurus Financial, Inc.*, Case No. 30-2016-00877483-CU-OE-CXC (Orange County Superior Court); *Farran v. Doordash, Inc.*, Case No. 30-2018-00992677-CU-OE-CXC (Orange County Superior Court); *Garcia v. Emerald Landscape Services, Inc.*, Case No. 30-2018-01011098-CU-OE-CXC (Orange County Superior Court); *Garcia v. Emerald Landscape Services, Inc.*, Case No. 30-2018-01032804-CU-OE-CXC (Orange County Superior Court); *Gomez v. Atlas Copco Mafi-Trench et al.*, Case No. 30-2018-01016730-CU-OE-CXC (Orange County Superior Court); *Gonzalez v. Artistic Maintenance, Inc.*, Case No. 30-2014-00699576-CU-OE-CXC (Orange

County Superior Court); *Guthridge v. Nationstar Mortgage, LLC*, Case No. 30-2018-01023680-CU-OE-CXC (Orange County Superior Court); *Gutierrez et al. v. Bender Ready Mix, Inc.*, Case No. 30-2016-00884715-CU-OE-CXC (Orange County Superior Court); *Martinelli v. Penhall Co.*, Case No. 30-2018-00998193-CU-OE-CXC (Orange County Superior Court); *Medina v. Katzkin Leather, Inc.*, Case No. BC680102 (Los Angeles County Superior Court); *Mustedanagic v. Hoag Memorial Hospital Presbyterian*, Case No. 30-2018-01011782-CU-OE-CXC (Orange County Superior Court); *Padilla v. Orkin, LLC*, Case No. CIVDS1819296 (Orange County Superior Court); *Perez v. Wireless World LLC et al.*, Case No. 30-2018-01016025-CU-OE-CXC (Orange County Superior Court); *Ryder v. Genpact*, Case No. 30-2018-00974115-CU-OE-CXC (Orange County Superior Court); *Sanchez v. Jetblue Airways Corp.*, Case No. BC719081 (Los Angeles County Superior Court); *Sarraf v. Employbridge, LLC et al.*, Case No. 30-2018-01017401-CU-OE-CXC (Orange County Superior Court); *Sessions v. Nightingale Nurses, LLC*, Case No. RG18922402 (Alameda County Superior Court); *Solis v. Integral Senior Living, LLC*, Case No. 30-2018-01015988-CU-OE-CJC (Orange County Superior Court); *Tiedemann v. KDB Restaurants, LLC*, Case No. CGC-15-544994 (San Francisco County Superior Court); *Velasquez v. IEC Corporation*, Case No. 30-2018-01014630-CU-OE-CXC (Orange County Superior Court); *Whisler v. Simpson Irvine, Inc. et al.*, Case No. 30-2018-01032237-CU-OE-CXC (Orange County Superior Court); *Whitaker v. U.S. Renal Care, Inc.*, Case No. BC649682 (Los Angeles County Superior Court); *Yahoo! Inc. Private Information Disclosure Cases*, Case No. JCCP 4895 (Orange County Superior Court); and *Zrinski v. Rubio's Restaurants, Inc.*, Case No. 30-2018-01015274-CU-OE-CXC (Orange County Superior Court).

8. I currently serve as plaintiffs' counsel of record in at least the following employment class actions and/or representative actions: *Arellano v. Vision Scenery Corporation, Inc.*, Case No. 21STCV35878 (Los Angeles County Superior Court); *Corona v. Exquisite Apparel Corp. et al.*, Case No. 21STCV02421 (Los Angeles County Superior Court); *Cruz v. Nason Roofing, Inc.*, Case No. 30-2021-01235276-CU-OE-CXC (Orange County Superior Court); *Dominguez v. KTRE1 LLC, et al.*, Case No. 37-2023-00012018-CU-OE-CTL

(San Diego County Superior Court); *Guardado v. Millennium Reinforcing, Inc.*, Case No. 20STCV39672 (Los Angeles County Superior Court); *Javier v. Webster Bros. Concrete Construction, Inc.*, Case No. 20STCV27129 (Los Angeles County Superior Court); *Leon v. ALAL LLC, et al.*, Case No. 22STCV07259 (Los Angeles County Superior Court); *Lopez v. Empire Connect, LLC*, Case No. 21STCV44777 (Los Angeles County Superior Court); *Lopez v. Northern Café et al.*, Case No. 20STCV04625 (Los Angeles County Superior Court); *Lopez v. Empire Connect, LLC, et al.*, Case No. 21STCV44777 (Los Angeles County Superior Court); *Lopez v. The Highest Craft, LLC et al.*, Case No. CVRI2100648 (Riverside County Superior Court); *Martinez v. California Friends Homes*, Case No. 23STCV05820 (Los Angeles County Superior Court) *Martinez v. L.A.R.K. Industries, Inc.*, Case No. 30-2019-01110981 (Orange County Superior Court); *Montano v. ALG Vacations Corp.*, Case No. CVRI2301362 (Riverside County Superior Court); *Perez v. Velvet Yogurt, Inc.*, Case No. 30-2021-01221399-CU-OE-CXC (Orange County Superior Court); *Quiroz v. Coffman Specialties, Inc.*, Case No. 37-2020-00022698-CU-OE-CTL (San Diego County Superior Court); *Ramirez v. Casa Orozco Incorporated et al.*, Case No. RG21091979 (Alameda County Superior Court); *Ramirez v. Pacific Coast Producers*, Case No. STK-CV-UOE-2022-0010664 (San Joaquin County Superior Court); *Reese v. SGM, Inc. et al.*, Case No. CIVSB2106217; *Rosas v. Sierra Pacific Refrigerated Services, LLC et al.*, Case No. CV-21-003621 (Stanislaus County Superior Court); *Ruiz v. Lion Foods*, Case No. 21CV386961 (Santa Clara County Superior Court); *Saenz v. Class Leasing*, Case No. CVRI2205259 (Riverside County Superior Court); *Segal, et al. v. Beverly Hills Properties, LLC*, Case No. 21STCV34228 (Los Angeles County Superior Court); and *Sheppard v. Bekins Moving Solutions, Inc.*, Case No. 21STCV44484 (Los Angeles County Superior Court).

9. I attended college at the University of California San Diego, where I double majored in Political Science: Public Law and Communications. I received my Bachelor of Arts for both majors in 2007 and was awarded multiple Provost's Honors.

10. I graduated from Washington University in St. Louis School of Law ("WUSTL School of Law"), where I received my J.D. in 2014 and studied as a visiting scholar at the

1 University of California Los Angeles School of Law during the 2013-2014 school year. Both
2 law schools are consistently ranked in the top 20 law schools by U.S. News & World Report.
3 During law school, I was a Scholar in Law recipient, a CALI Award Winner for Mediation
4 Theory and Practice, made the Dean's List for being in the top 20% of my class, and was an
5 Associate Editor for WUSTL School of Law's Journal of Law & Policy.

6 11. During law school, in the summer of 2011, I began working as a Law Clerk at
7 an established plaintiffs'-side employment class action law firm – Jose Garay, APLC ("Garay
8 Law"). I continued to clerk part-time during law school and full-time during summers. As a
9 Law Clerk for Garay Law, I drafted countless class action complaints, discovery requests and
10 responses, and motions; attended hearings under the supervision of attorneys; worked closely
11 with expert witnesses and created damage analyses for mediations; drafted mediation briefs and
12 attended mediations, including the mediation for *Thomas v. Cognizant Technology Solutions*
13 *U.S. Corporation*, Case No. SACV 11-1123 (Central District of California) which resulted in a
14 \$4,000,000.00 settlement on behalf of non-exempt computer software engineers who were
15 misclassified as exempt employees under California's computer professional exemption.

16 12. During law school, I also took business school courses at Washington University
17 in St. Louis Olin Business School. Upon graduating law school in 2014, I took and passed the
18 July 2014 California Bar Exam.

19 13. After investing in and operating a start-up company, I began practicing law as
20 an attorney in 2016. I began working as an associate for Garay Law, primarily litigating wage
21 and hour class actions, and handling all facets of litigation, including, but not limited to, drafting
22 correspondences, pleadings, discovery, settlement agreements, and motions, making
23 appearances and handling hearings, defending depositions, working with expert witnesses and
24 attending mediations, and creating damage analyses.

25 14. I also worked as an associate in Bisnar Chase LLP's class action department.
26 While working at Bisnar Chase, in addition to other employment and consumer class actions, I
27 litigated the data breach class action lawsuit titled *Yahoo! Inc. Private Information Disclosure*
28 *Cases*, Case No. JCCP 4895 (Orange County Superior Court) that affected millions of

Americans. As part of the *Yahoo* data breach class action, I worked closely with co-counsel Robinson Calcagnie, Inc. by reviewing thousands of documents, drafting internal memorandums, and preparing the deposition outline and attending the deposition of Yahoo's head of cybersecurity. In addition, while at Bisnar Chase, I was intricately involved in the class certification phase of the wage and hour class action titled *Grant et al. v. Car Spa, Inc.*, Case No. RIC1310176 (Riverside County Superior Court). During litigation of the *Grant* employment class action, I appeared and handled hearings, defended over a dozen putative class member depositions and cross-examined witnesses, met and conferred with opposing counsel on numerous occasions, and drafted pleadings and correspondences. The Riverside County Superior Court granted plaintiffs' motion for class certification.

15. More recently, I worked for the well-known employment class action law firm – Aegis Law Firm. As an associate for Aegis, I managed 25 to 30 employment class action cases handling all aspects of litigation, including, but not limited to, drafting all notices, correspondences, pleadings, discovery, motions, settlements, and mediation briefs; working closely with expert witnesses for mediations and class certification; attending mediations; appearing and handling all hearings for my assigned cases; handling all depositions; corresponding with clients; and meeting and conferring with opposing counsel. Of note, I was the primary attorney during significant portions of litigation in the *Gamboa v. Kamran Staffing Inc. et al.*, Case No. CIVDS1605273 (San Bernardino County Superior Court) employment class action. I drafted numerous pleadings, meet and confer correspondences, discovery, and motions including plaintiff's motion for class certification; conferred with class members and expert witness; defended numerous class member depositions and cross-examined witnesses; and appeared and handled hearings, among other things. The San Bernardino County Superior Court granted plaintiff's motion for class certification.

16. In sum, for the past 13 years I have primarily focused on employment class actions and played a critical role in obtaining millions of dollars on behalf of thousands of employees, both as an attorney and as a law clerk.

17. In 2019, I founded the Law Office of Daniel J. Hyun, focusing on plaintiffs' -side

1 employment class actions. Although I provide pro bono legal services to low-income
2 individuals in the areas of contract, property, and criminal law, as well as other civil matters,
3 my primary practice is employment class actions. In addition, I have been a member of the
4 American Bar Association, American Association for Justice, Orange County Trial Lawyers
5 Association, California Employment Lawyers Association, California State Bar's Labor and
6 Employment section, and Orange County Bar Association.

7 18. In 2023, I co-founded Torus LLP and am a Partner at the firm. The firm primarily
8 litigates wage and hour class and representative PAGA actions, as well as other types of
9 representative and collective actions.

10 19. I was selected as a Super Lawyers Rising Star by Thomson Reuters, representing
11 one of the top 2.5% of lawyers under 40 in Southern California in 2018, 2019, 2020, 2021,
12 2022, 2023, and 2024 in the practice area of Class Action & Mass Torts.

13 20. I have billed a total of 107.9 hours working on this case at a rate of \$650 per hour,
14 which was previously approved by prior courts (e.g., *Saenz v. Class Leasing, LLC, et al.*,
15 Riverside Superior Court Case No. CVRI2205259) and is well below the recommended \$839
16 hourly rate per the Laffey Matrix, resulting in a lodestar of \$70,135. The hourly rates are
17 comparable to those charged by other class action plaintiff's counsel and the firms defending class
18 action cases. Torus LLP and Lauby, Mankin & Lauby LLP dedicated significant resources to this
19 case by dividing the tasks required according to skill level, and the professional hours generated
20 by each firm are neither unreasonable nor duplicative. I am not seeking fees for time spent on this
21 case by any other attorney or staff members from my firm. In addition, my firm incurred costs in
22 the amount of \$2,068.36.

23 21. Plaintiff will seek Court approval of the requested attorneys' fees award of up to
24 one-third of the Gross Settlement Amount (currently equal to \$323,333.33), and \$21,272.07 in
25 reimbursement of litigation costs, which includes my co-counsel's costs of \$19,203.71.

26 22. Torus LLP has expended considerable time and effort on this case and will
27 continue to do so through final approval of the class action settlement as well as any subsequent
28 compliance hearing.

23. Based on my experience and litigation of this action, the class action settlement is fair, reasonable, and adequate.

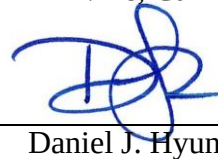
Exhibits

1. A true and correct copy of a detailed breakdown of the attorney hours expended in this case is attached hereto as **Exhibit 1**.

2. A true and correct copy of a detailed breakdown of the costs incurred in this case is attached hereto as **Exhibit 2**.

3. A true and correct copy of the Laffey Matrix is attached hereto as **Exhibit 3**.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 2, 2024 in Irvine, California.



Daniel J. Hyun

EXHIBIT 1

TORUS LLP		
Matter: <i>Medina, et al. v. Howard Roofing Company, Inc.</i>		
Attorney: Daniel Hyun		
Hourly Rate: \$650		
Date	Subject	Time
6/2/2023	Review and analyze correspondences, facts, and evidence	0.4
	Research re: defendant	0.2
	Confer with client	1
	Draft client documents	0.5
6/6/2023	Review and analyze correspondences and status	0.2
	Confer internally re: case	0.2
6/11/2023	Review and analyze correspondences, deadlines, and assignments; update file and task list	0.3
6/30/2023	Review and analyze correspondences, notes, documents, evidence, exemplars, and assignments; update task list and case status sheet	0.5
	Confer internally re: case	0.3
	Draft PAGA notice; upload and certified mail re: same	3.1
	Confer with LWDA re: notice	0.2
	Draft summons, complaint, civil case cover sheet, and addendum; file re: same	4.3
7/3/2023	Review and analyze correspondences	0.2
	Confer internally re: case	0.2
7/8/2023	Review and analyze correspondences, pleadings, docket, deadlines, and assignments; update file, case status sheet, task list, and calendar	0.5
8/10/2023	Review and analyze docket, correspondences, pleadings, order, case status, deadlines, and assignments	0.3
8/21/2023	Review and analyze pleadings, case status, deadlines, and assignments; update task list	0.5
	Serve documents	0.3
	Research re: defendant	0.3
8/22/2023	Review and analyze correspondences	0.2
8/23/2023	Review and analyze docket, pleadings, order, exemplars, deadlines, and assignments; update task list	0.5
	Draft, finalize, file, and serve Plaintiff's statement	1.1
8/24/2023	Review and analyze correspondences	0.2
8/25/2023	Review and analyze correspondences	0.2
8/29/2023	Review and analyze docket, deadlines, and assignments; update task list and file; file proof of service	0.4
8/30/2023	Attend hearing	0.3
	Review and analyze correspondences, deadlines, and assignments; update task list	0.3
8/31/2023	Review and analyze correspondences	0.2
	Confer with defense re: call	0.1

9/11/2023	Review and analyze correspondences, pleadings, facts, deadlines, and assignments; update task list and intake	0.9
	Conference call with client	0.7
	Draft amended complaint and PAGA notice	2.7
9/12/2023	Review and analyze correspondences, pleadings, drafts, deadlines, and assignments; update task list	1.3
	Revise, finalize, file, and serve amended complaint, notice of ruling, proof of service, and amended PAGA notice	3.6
	Confer with defense re: case	0.3
9/13/2023	Review and analyze correspondences, pleadings, order, and calendar	0.3
	Confer with defense re: pleadings and order	0.2
9/14/2023	Review and analyze correspondences	0.2
9/15/2023	Review and analyze correspondences and pleadings	0.3
	Confer with defense re: case	0.2
	Confer with related case counsel re: case	0.2
9/19/2023	Review and analyze correspondences	0.2
	Confer internally re: case	0.2
	Confer with defense re: call	0.1
9/20/2023	Review and analyze docket, correspondences, pleadings, case status, deadlines, and assignments; prepare outline; update file	0.4
	Confer internally re: case	0.3
	Confer with defense re: case	0.2
9/27/2023	Review and analyze correspondences and pleadings	0.3
	Confer with related case counsel re: case	0.2
	Confer internally re: case	0.3
10/3/2023	Review and analyze correspondences and case status	0.2
	Confer with related case counsel re: case	0.1
10/4/2023	Review and analyze correspondences	0.2
	Confer with defense re: case	0.2
10/10/2023	Review and analyze correspondences and case status	0.3
	Confer internally re: case	0.3
	Confer with related counsel re: case	0.4
10/12/2023	Review and analyze correspondences, pleadings, deadlines, and assignments	0.4
	Confer with related case counsel	0.3
	Confer internally re: case	0.3
	Confer with defense re: case	0.2
10/13/2023	Review and analyze correspondences	0.2
	Confer internally re: case	0.3
10/16/2023	Review and analyze correspondences, exemplars, and draft	0.2
	Confer with co-counsel re: case	0.3
	Review and revise joint prosecution agreement	0.3

	Research re: ethical rules	0.2
10/17/2023	Review and analyze correspondences	0.2
	Confer with co-counsel re: case	0.2
	Call with co-counsel re: case	0.3
11/10/2023	Review and analyze docket, case status, deadlines, and assignments	0.3
11/17/2023	Review and analyze docket, correspondences, drafts, deadlines, and assignments; update task list	0.4
	Revise and finalize JPA; sign re: same	0.3
	Confer with co-counsel re: case	0.3
	Confer internally re: case	0.3
	Confer with client	0.2
	Draft notice of name change and address; file and serve re: same	0.4
11/21/2023	Review and analyze correspondences, pleadings, agreement, deadlines, and assignments; update file, calendar, and task list; upload PAGA notice to LWDA	0.5
	Confer internally re: case	0.3
	Confer with co-counsel re: case	0.2
11/22/2023	Review and analyze correspondences, draft, deadlines, and assignments	0.3
	Confer with defense re: stipulation	0.2
	Revise stipulation	0.2
11/28/2023	Review and analyze docket, correspondences, deadlines, and assignments; update task list; setup appearance	0.4
	Confer with defense re: hearing	0.2
11/29/2023	Attend hearing	0.7
	Confer with defense re: hearing	0.3
	Confer with clerk re: hearing	0.2
	Confer internally re: hearing	0.3
	Confer with LACC re: hearing	0.6
12/1/2023	Review and analyze correspondences and agreement; update file	0.2
	Confer with co-counsel re: case	0.1
12/7/2023	Review and analyze correspondences, pleadings, order, deadlines, and assignments; update case status sheet, calendar, and task list	0.5
	Confer with defense re: case	0.3
12/18/2023	Review and analyze correspondences, deadlines, and assignments	0.2
	Finalize joint statement	0.2
	Confer with defense re: joint statement	0.2
12/19/2023	Review and analyze correspondences	0.2
12/22/2023	Review and analyze correspondences	0.2
	Confer with defense re: case	0.2

12/26/2023	Review and analyze docket, correspondences, pleadings, order, exemplars, deadlines, and assignments; update task list	0.5
	Draft OSC declaration; file and serve re: same	1
12/27/2023	Review and analyze docket, correspondences, case status, deadlines, and assignments; update case status sheet, calendar, and task list	0.4
12/28/2023	Review and analyze case status, deadlines, and assignments; update task list	0.3
1/4/2024	Review and analyze correspondences, deadlines, and assignments; update task list	0.3
	Confer with co-counsel re: mediation	0.2
1/5/2024	Review and analyze correspondences; update file	0.2
	Confer with co-counsel re: case	0.2
1/9/2024	Review and analyze correspondences	0.2
	Confer internally re: case	0.2
2/7/2024	Review and analyze correspondences	0.2
	Confer internally re: case	0.2
2/9/2024	Review and analyze correspondences	0.2
	Confer internally re: case	0.2
2/12/2024	Review and analyze correspondences, case status, docket, deadlines, and assignments; update task list	0.3
	Confer internally re: case	0.2
2/13/2024	Review and analyze correspondences, deadlines, and assignments; update task list	0.2
	Confer with defense re: client	0.2
2/20/2024	Review and analyze correspondences, evidence, deadlines, and assignments	0.5
	Confer with co-counsel re: case	0.4
	Confer internally re: case	0.4
2/21/2024	Review and analyze correspondences	0.3
	Confer with defense re: informal discovery	0.2
	Confer with co-counsel re: informal discovery	0.2
2/23/2024	Review and analyze correspondences; update calendar	0.3
	Confer internally re: case	0.3
	Confer with co-counsel re: mediation	0.2
	Confer with client	0.3
	Draft client questionnaire responses	0.5
2/26/2024	Review and analyze correspondences and brief; update file	0.2
	Confer with defense re: records	0.2
	Confer with co-counsel re: mediation	0.2
2/27/2024	Review and analyze correspondences and document production; update file	0.3
	Confer with co-counsel re: case	0.2
2/28/2024	Review and analyze correspondences and drafts	0.4

3/3/2024	Review and analyze brief, documents, data, drafts, and exemplars; prepare outline for mediation	1.3
3/4/2024	Confer with co-counsel re: mediation	0.2
	Review and analyze brief, documents, data, and brief; prepare outline for mediation	0.6
	Attend mediation	8.7
	Confer internally re: case	0.3
	Confer with client	0.4
	Revise MOU	0.4
3/5/2024	Review and analyze correspondences and agreement; setup appearance	0.3
	Confer internally re: MOU	0.4
	Confer with co-counsel re: MOU	0.2
3/6/2024	Review and analyze docket, correspondences, pleadings, case status, deadlines, and assignments; update task list	0.4
	Attend hearing	0.3
	Confer with defense re: hearing	0.2
3/8/2023	Review and analyze correspondences, pleadings, and drafts	0.5
	Confer with co-counsel re: case	0.2
3/13/2024	Review and analyze correspondences, pleadings, and drafts	0.4
	Confer internally re: case	0.2
3/14/2024	Review and analyze docket, correspondences, pleadings, orders, exemplars, case status, deadlines, and assignments; update task list, case status sheet, and calendar	0.6
	Draft email to Case Anywhere re: case initiation	0.2
	Confer internally re: order	0.3
	Draft Notice of Ruling	0.3
3/15/2024	Review and analyze correspondences, pleadings, case status, deadlines, and assignments; update task list and file	0.4
	Confer with Case Anywhere re: case initiation	0.2
	Draft, file, and serve notice of ruling	0.6
3/19/2024	Review and analyze correspondences and case status	0.2
3/26/2024	Review and analyze correspondences, case status, deadlines, and assignments	0.2
4/2/2024	Review and analyze correspondences and drafts	0.4
4/3/2024	Review and analyze dockets, correspondences, pleadings, and case status; update file	0.3
4/9/2024	Review and analyze dockets, correspondences, case status, pleadings, order, deadlines, and assignments; update file, case status sheet, task list, and calendar	1.1
4/11/2024	Review and analyze pleadings, order, drafts, and case status; update task list	0.9

	Confer with co-counsel re: dismissal	0.2
	Revise settlement and class notice	0.2
4/19/2024	Review and analyze correspondences	0.2
4/22/2024	Review and analyze correspondences, case status, deadlines, and assignments; update task list	0.4
5/6/2024	Review and analyze correspondences, pleadings, dockets, exemplars, case status, deadlines, and assignments	0.7
	Confer internally re: case	0.2
	Confer with co-counsel re: settlement	0.2
	Draft request for dismissal, declaration, and proposed order	0.4
5/7/2024	Review and analyze correspondences, case status, and assignments	0.3
	Confer internally re: case	0.4
5/13/2024	Review and analyze correspondences, pleadings, settlement, exemplars, drafts, case status, deadlines, and assignments; update task list and file	0.9
	Draft declaration, proposed order, notice, and proof of service; file re: same	2.8
	Confer internally re: case	0.3
5/14/2024	Review and analyze correspondences, pleadings, drafts, exemplars, case status, deadlines, and assignments; update task list and file	0.4
	Confer with clerk re: dismissal	0.1
	Draft and file request for dismissal	0.6
	Confer internally re: case	0.3
5/15/2024	Review and analyze correspondences, pleadings, case status, and assignments; update task list; re-file pleadings	0.4
	Confer with clerk re: dismissal	0.1
5/17/2024	Review and analyze correspondences, pleadings, and order; update file	0.3
	Confer with co-counsel re: settlement	0.2
5/20/2024	Review and analyze correspondences, pleadings, case status, deadlines, and assignments; update case status sheet, task list, and calendar	0.9
5/21/2024	Review and analyze correspondences and drafts	0.8
5/23/2024	Review and analyze correspondences, pleadings, settlement, drafts, exemplars, case status, deadlines, and assignments; update file and task list	0.9
	Draft and revise settlement	1.6
5/24/2024	Review and analyze correspondences and drafts	0.2
	Revise class notice	0.2
	Confer with all counsel re: notice	0.2
5/29/2024	Review and analyze correspondences and drafts	0.3
	Revise settlement	0.2

	Confer with co-counsel re: settlement	0.2
	Confer internally re: settlement	0.3
	Confer with defense re: settlement	0.2
5/31/2024	Review and analyze correspondences, pleadings, brief, drafts, case status, exemplars, deadlines, and assignments	0.5
	Confer internally re: declaration	0.3
	Confer with co-counsel re: declaration	0.2
	Draft declaration	0.4
	Confer with client	0.3
6/3/2024	Review and analyze correspondences, pleadings, brief, exemplars, drafts, case status, deadlines, and assignments; update task list, calendar, case status sheet, and file	0.7
	Confer with co-counsel re: motion	0.2
	Draft declaration	0.4
6/17/2024	Review and analyze correspondences	0.3
	Confer internally re: case	0.2
	Confer with co-counsel re: case	0.2
	Confer with defense re: case	0.2
6/25/2024	Review and analyze correspondences, case status, deadlines, and assignments	0.2
	Confer with co-counsel re: hearing	0.2
6/26/2024	Review and analyze correspondences, settlement, MOU, drafts, case status, and assignments; update file	0.5
	Revise drafts	0.4
	Confer with co-counsel re: case	0.3
	Confer internally re: case	0.2
6/28/2024	Review and analyze correspondences, pleadings, order, case status, deadlines, and assignments; update case status sheet, task list, and calendar	0.4
	Confer with co-counsel re: case	0.2
	Confer with defense re: case	0.2
7/1/2024	Review and analyze correspondences, drafts, case status, deadlines, and assignments	0.3
7/17/2024	Review and analyze correspondences	0.2
7/23/2024	Review and analyze correspondences, drafts, and case status	0.3
7/25/2024	Review and analyze correspondences	0.2
7/29/2024	Review and analyze correspondences	0.2
8/8/2024	Review and analyze correspondences	0.2
8/13/2024	Review and analyze correspondences and case status	0.2
	Confer internally re: case	0.2
8/14/2024	Review and analyze correspondences	0.2
8/16/2024	Review and analyze correspondences and data	0.2
8/19/2024	Review and analyze correspondences and case status	0.2

8/22/2024	Review and analyze correspondences, drafts, and case status	0.2
	Confer with co-counsel re: case	0.2
	Confer internally re: case	0.3
	Confer with client	0.3
	Draft client documents	0.4
8/26/2024	Review and analyze correspondences, data, drafts, and case status	0.3
	Confer internally re: case	0.2
	Confer with client	0.2
	Confer with co-counsel re: case	0.2
	Confer with defense re: case	0.1
9/3/2024	Review and analyze correspondences and data	0.2
9/5/2024	Review and analyze correspondences, case status, deadlines, and assignments	0.2
	Confer with co-counsel re: case	0.2
	Confer internally re: case	0.2
09/06/2024	Review and analyze correspondences and documents; update file	0.3
	Confer internally re: case	0.2
9/12/2024	Review and analyze correspondences	0.2
	Confer with defense re: settlement	0.1
9/17/24	Review and analyze correspondences, case status, deadlines, and assignments; update task list	0.3
	Confer with co-counsel re: case	0.1
9/19/24	Review and analyze correspondences and deadlines	0.3
	Confer with co-counsel re: case	0.2
	Confer with First Legal re: invoices	0.2
	Confer internally re: case	0.3
09/20/2024	Review and analyze correspondences, exhibits, and exemplars	0.4
	Confer internally re: case	0.2
09/23/2024	Review and analyze correspondences and case status	0.2
10/02/2024	Review and analyze docket, correspondences, pleadings, order, exhibits, case status, exemplars, deadlines, and assignments; update task list and file	0.5
	Draft declarations	1.3
	Confer internally re: case	0.3
	Total Hours	107.9
	Total Lodestar	\$70,135

EXHIBIT 2

TORUS LLP

TORUS LLP
Transaction Detail By Account
All Transactions

As of 10/02/2024

Accrual Basis

Date	Payee	Case	Memo	Amount
06/30/2023	LWDA	Medina v. HRC	LWDA Filing Fees	75.00
07/03/2023	One Legal	Medina v. HRC	Filing Fees	1,494.99
08/24/2023	One Legal	Medina v. HRC	Filing Fees	17.66
08/30/2023	One Legal	Medina v. HRC	Filing Fees	17.66
09/14/2023	One Legal	Medina v. HRC	Filing Fees	17.66
09/15/2023	One Legal	Medina v. HRC	Service Fees	123.54
11/20/2023	One Legal	Medina v. HRC	Filing Fees	17.66
12/27/2023	One Legal	Medina v. HRC	Filing Fees	17.66
03/31/2024	First Legal	Medina v. HRC	Filing Fees	16.15
05/31/2024	First Legal	Medina v. HRC	Filing Fees	16.15
05/31/2024	First Legal	Medina v. HRC	Filing Fees	11.95
05/31/2024	First Legal	Medina v. HRC	Filing Fees	16.15
06/05/2024	Case Anywhere	Medina v. HRC	Service Fees	160.95
10/02/2024	USPS/Misc	Medina v. HRC	Cumulative Print, Mileage, and Postage Fees	65.18

Total Expenses 2,068.36

EXHIBIT 3

LAFFEY MATRIX

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[Case Law](#)
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Years Out of Law School *							
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734

6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

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

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

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