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Attorneys for Plaintiffs SYNTHIA CASTILLO GARCIA,
LIZ ADRIANA CHAVEZ, and all other similarly situated persons

[Additional Counsel on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN BERNARDINO

SYNTHIA CASTILLO GARCIA, on
behalf of herself and all others similarly
situated,

Plaintiff,

v.

KALAVERAS RC INC, a California
corporation, and DOES 1-20, inclusive,

Defendants.

Case No. CIVSB2315395
Assigned for All Purposes to:
The Hon. Kevin C. Lee
Dept.: S-26

SUPPLEMENTAL DECLARATION OF TODD M.
FRIEDMAN IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT

Date: April 24, 2026
Time: 8:30 a.m.

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21 Attorneys for Plaintiff ERIK NOLASCO, and all other similarly situated persons

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DECLARATION OF TODD M. FRIEDMAN

I, Todd M. Friedman, declare:

1. I am a partner at The Law Offices of Todd M. Friedman, P.C. and an attorney in good standing duly admitted to the State Bar of California and before this Court and an attorney of record for Plaintiff Erik Nolasco ("Plaintiff") in this class action against Defendant Kalaveras RC Inc. ("Defendant").

2. This declaration is submitted in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement in the above-captioned action. Except for those matters stated on information and belief, which I am informed and believe are true and correct, I have personal knowledge of all matters set forth herein. If called as a witness, I could and would competently testify thereto.

3. I am filing this Declaration to supplement my prior declaration in support of preliminary approval and provide the court with my firm's lodestar and costs summaries. At final approval I will offer further substantiation for these figures.

4. The Law Offices of Todd M. Friedman, P.C. has maintained records of activity in this matter since the commencement of this action. The firm used software to track activity and deadlines related to this case. These activity logs are used to determine time spent on each task, and by extension, hours spent on the case. Our costs to date are \$2,237.50. To date, the firm has incurred approximately 65.2 hours for this case, with a total lodestar of \$56,257.50. We will undoubtedly be receiving a negative multiplier on our lodestar by the time of Final Approval, even if we spend no more time on this case.

5. The billing rate of Todd M. Friedman is \$1,150 per hour in this case, Mr. Bacon's billing rate is \$975 per hour, the billing rate for senior associates is \$875, the rate for associates is \$525-625 per hour, and the rate for paralegals is \$295 per hour.

6. The firm has incurred litigation costs in this matter in the amount of \$2,237.50 to date including filing expenses, service fees, and other miscellaneous expenses. These costs are comprised of costs for filing and serving the complaint, transmitting copies of filings to the Honorable Court, and related expenses. Here is a summary of the costs my firm has incurred to date:

Category	Amount
PAGA filing fee	\$75.00
court filing	\$2,162.50
Total:	\$2,237.50

7. The Law Offices of Todd M. Friedman, P.C.'s hourly rates are reasonable in respect to the ranges charged by comparable law firms in the State of California. In light of our extensive class action experience and the customary rates on the Laffey Matrix, our rates represent the current hourly rates my firm has been billing in 2026. A \$1,150 hourly rate of is warranted for Mr. Friedman, and \$975 is warranted for Mr. Bacon based on their litigation experience and practice level.

8. With regard to a bare bones loadstar amount, our current records reflect approximately 65.2 hours of work from my firm split between myself, Mr. Bacon, Mr. Sosa, and paralegals from my firm. The following summary represents a conservative estimate of the time spent by each member of our firm based on the tasks they worked on and as is documented in our firm's files and corroborated by emails traffic as to each task.

Name	Position	Hours	Rate	Total
Todd Friedman	Managing Partner 20+ years	4.5	\$1,150.00	\$5,175.00
Adrian Bacon	Partner 15 years	45.7	\$975.00	\$44,557.50
Gerardo Sosa	Associate 6 years	7.5	\$575.00	\$4,312.50
Erika Campany	Office Manager/Head Paralegal	3.2	\$295.00	\$944.00
Lauren Walker	Paralegal	1.8	\$295.00	\$531.00
Karla Uribe	Paralegal	2.5	\$295.00	\$737.50
Tota Hours:		65.2	Total Fees:	\$56,257.50

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 27, 2026, at Calabasas, California.

By: /s Todd M. Friedman

S/ Todd M. Friedman, Esq.