

1 Eve H. Cervantez (State Bar No. 164709)
2 Robin Tholin (State Bar No. 344845)
3 ALTSHULER BERZON LLP
4 177 Post Street, Suite 300
5 San Francisco, CA 94108
6 Telephone: (415) 421-7151
7 Facsimile: (415) 362-8064
8 ecervantez@altber.com
9 rtholin@altber.com

10 Alexander T. Ricke (*pro hac vice*)
11 STUEVE SIEGEL HANSON LLP
12 460 Nichols Road, Suite 200
13 Kansas City, Missouri 64112
14 Telephone: 816-714-7100
15 ricke@stuevesiegel.com

16 *Counsel for Plaintiff Grace Fleming*

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**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

GRACE FLEMING, individually and on behalf
of all other similarly situated aggrieved
employees,

Plaintiff,

v.

TRUSTED HEALTH, INC. and DOES 1-50,
inclusive

Defendants.

Case No.: CGC-23-611120

**DECLARATION OF ALEXANDER T.
RICKE IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR
APPROVAL OF PAGA SETTLEMENT,
ATTORNEYS' FEES AND EXPENSES,
AND SERVICE AWARD**

Date: March 20, 2025

Time: 9:30 a.m.

Dept.: 606

Judge: Hon. Jeffrey S. Ross

Complaint Filed: December 15, 2023

Trial Date: August 25, 2025

I, Alexander T. Ricke, declare as follows:

1. I am an attorney and partner with the law firm Stueve Siegel Hanson LLP based in Kansas City, Missouri. Since this case's inception, I have been one of the lead lawyers (along with my co-counsel at Altshuler Berzon LLP), representing Plaintiff and prospective PAGA Group members in this Action. I make these statements based on personal knowledge and would so testify if called as a witness at trial.

2. This Declaration is submitted in support of Plaintiff's Unopposed Motion for Approval of PAGA Settlement, Attorneys' Fees and Expenses, and Service Award.

Qualifications of Counsel

3. Stueve Siegel Hanson LLP practices almost exclusively in complex litigation in state and federal courts across the country. The firm has approximately 30 attorneys who work from our Kansas City, Missouri office handling large-scale, high-stakes litigation usually on a fully contingent basis.

4. Since 2022, the firm has increased its focus on the travel nurse staffing industry and the wage and hour violations occurring in that space. This case is part of a broader practice by the firm's lawyers to rectify wage and hour issues in the industry.

5. Stueve Siegel Hanson began representing travel nurses in 2022 for what we refer to as the "bait-and-switch" mid-contract rate reduction (a common practice that is at issue in this case), and cancellation practice, which has been reported on by national media.¹ The firm has prosecuted overtime claims on behalf of travel nurses related to the staffing companies' failure to include the value of stipends (allegedly expense reimbursement) in the regular rate of pay for overtime. For example, the firm currently represents thousands of travel nurses as part of certified collective actions across the country. *See, e.g., Hamilton v. NuWest Grp. Holdings, LLC*, No. C22-1117RSM, 2023 WL 3582939 (W.D. Wash. May 22, 2023) (granting conditional collective certification of travel nurse overtime claims); *Egan v. Fastaff, LLC*, Case No. 1:22-cv-03364, ECF No. 42 (D. Colo. Oct. 19, 2023) (granting conditional collective certification of travel nurse overtime claims).

¹ <https://www.newsweek.com/2022/09/30/travel-nurse-pay-slashed-bait-switch-1745821.html>

6. I have been actively involved in this case from inception through settlement. I helped develop the regular rate overtime theory, assisted in developing the litigation strategy, and have been the principal lawyer at the firm responsible for mediation, settlement negotiation, and the settlement approval process.

7. I am a 2012 graduate of the University of Missouri School of Law and a 2009 graduate of the University of Missouri School of Journalism. I joined Stueve Siegel Hanson in 2016 as an associate after working for several years as an associate at another Kansas City firm focused on complex litigation. I joined Stueve Siegel Hanson's partnership in January 2023. During my tenure at the firm, I have taken lead roles in some of the firm's most challenging cases. I have been recognized as a Missouri and Kansas *SuperLawyers* Rising Star every year since 2016 and was recently recognized by Chambers USA Guide 2024 in Band 2: Labor & Employment: Mainly Plaintiffs.

8. Named one of Law360's Rising Stars for Employment in 2022 honoring top legal talent under the age of 40, I have served as lead counsel in scores of wage and hour class and collective actions recovering more than \$100 million for workers in various fields.

9. Since 2016, I have been recognized for my work representing minimum wage workers in the casino industry. I have served as lead counsel prosecuting minimum wage, tip credit, wage deduction, and overtime claims on behalf of low wage earning casino workers. Recoveries in these cases now exceed \$70 million with more matters currently pending. A selection of these results include:

- *Maldonado v. MGM Resorts International*, Case No. 1:20-cv-05599 (D.N.J.) (recovering \$12.5 million for a class of casino workers asserting minimum wage violations);
- *Stewart v. Rush Street Gaming, LLC*, Case No. 1:20-cv-02566 (N.D. Ill.) (recovering \$9.8 million for a collective of minimum wage casino workers for minimum wage violations);

- *Lockett v. Pinnacle Entertainment, Inc.*, Case No. 4:19-cv-00358 (W.D. Mo.) (\$6.25 million class and collective settlement for tip pooling and wage deduction violations);
- *Bartakovits v. Wind Creek Bethlehem, LLC*, Case No. 5:20-cv-01602 (E.D. Pa.) (\$6 million class settlement for tip credit and wage deduction violations);
- *Brown v. Rush Street Gaming, LLC*, Case No. 1:22-cv-00392 (N.D.N.Y.) (\$5.5 million class settlement for tip credit and wage statement);
- *Lipari-Williams v. Missouri Gaming Company, LLC*, Case No. 5:20-cv-06067 (W.D. Mo.) (\$5.5 million class and collective settlement for ERISA, tip pooling, and wage deduction violations);
- *James v. Boyd Gaming Corporation*, Case No. 2:19-cv-02260 (D. Kan.) (total settlement value of \$2.3 million for collectives of casino workers asserting tip credit and tip pooling violations, including separate payment of attorneys' fees);
- *Adams v. Aztar Indiana Gaming Company, LLC*, Case No. 3:20-cv-00143 (S.D. Ind.) (\$2.1 million class and collective settlement for minimum wage violations);
- *MacMann v. Tropicana St. Louis, LLC*, Case No. 4:19-cv-00404 (E.D. Mo.) (recovering total settlement value of \$1.3 million for classes and collectives of casino workers asserting tip credit, overtime, timeclock rounding, and wage deduction claims, including separate payment of attorneys' fees).

10. In addition to my wage and hour work, I have litigated complex commercial, product liability, and privacy matters to successful conclusions. For example, in 2022, I (along with my partners Patrick Stueve and Bradley Wilders) secured a settlement on the eve of trial for a certified class of Missouri governmental entities valued at \$56 million that provided for the removal and replacement of what the class alleged were dangerous and defective guardrail end terminals

throughout the state.² The settlement was recognized as a top three settlement in the State of Missouri in 2022.³

11. In addition, Stueve Siegel Hanson is one of the few firms to have successfully tried multiple class and collective actions to a jury. In the wage and hour context, George Hanson and other Stueve Siegel Hanson lawyers tried a class and collective action on behalf of meat packers at a Tyson plant for unpaid time spent “donning and doffing” required clothing and equipment. After winning a jury verdict in favor of the workers, Judge Marten (Ret.) of the District of Kansas observed of the wage and hour lawyers at Stueve Siegel Hanson that “it appears that plaintiffs’ counsel’s experience in wage hour class actions has unmatched depth.” *Garcia v. Tyson Foods, Inc.*, 2012 WL 5985561, at *4 (D. Kan. Nov. 29, 2012), *aff’d*, 770 F.3d 1300 (10th Cir. 2014).

12. In recent years, Stueve Siegel Hanson lawyers have tried other class actions resulting in 7, 8, and 9-figure verdicts for farmers and life insurance policy holders. In June 2017, Stueve Siegel Hanson, as co-lead counsel in the MDL, tried a class action in *In re: Syngenta AG MIR162 Corn litigation*, Case No. 14-MD-2591-JWL (D. Kan.) and secured a verdict of \$217,700,000 on behalf of Kansas corn farmers, which was ultimately resolved as part of a nationwide settlement. In 2018, the firm tried and secured a \$34,000,000 verdict on behalf of a class of approximately 24,000 State Farm life insurance policy holders in *Vogt v. State Farm Life Insurance Co.*, Case No. 16:4170-CV-C-NKL (W.D. Mo.), which was affirmed on appeal by the Eighth Circuit. *Vogt v. State Farm Life Ins. Co.*, 963 F.3d 753 (8th Cir. 2020), *cert. denied*, 141 S. Ct. 2551 (2021). In December 2022, Stueve Siegel Hanson lawyers secured a \$28,360,000 verdict on behalf of a Missouri class of Kansas City Life Insurance policy holders in *Karr v. Kansas City Life Ins. Co.*, Case No. 1916-CV- 26645, in the Circuit Court of Jackson County, Missouri, which was affirmed on appeal. *Karr v. Kansas City Life Ins. Co.*, 702 S.W.3d 1 (Mo. Ct. App. 2024), *reh’g and/or transfer denied* (Oct. 29, 2024), *transfer denied* (Dec. 23, 2024). In 2023, the firm tried another class action on behalf of Missouri policy holders against Kansas City Life Insurance

² <https://www.reuters.com/legal/government/trinity-industries-reaches-settlement-worth-56-million-missouri-guardrail-case-2022-05-31/>

³ <https://molawyersmedia.com/2023/01/10/missouri-lawyers-media-top-vs-winners-of-2022-announced/>

Company and recovered a verdict over \$4,000,000 in *Sheldon v. Kansas City Life Ins. Co.*, Case No. 1916-cv-26689, in the Circuit Court of Jackson County, Missouri. Also in 2023, the firm obtained a nearly \$1 million jury verdict on behalf of a class of Kansas policy holders against Kansas City Life Insurance Company, which was also affirmed on appeal. *Meek v. Kansas City Life Ins. Co.*, 126 F.4th 577 (8th Cir. 2025). The firm’s trial experience lends credibility to our ability to litigate, try, and collect class action judgments on behalf of our clients.

Plaintiff’s Counsel’s Work on this Case

13. On June 14, 2023, Plaintiff filed a notice with the Labor and Workforce Development Agency (“LWDA”) asserting multiple violations of the Labor Code. The requisite 65 days passed, and the LWDA did not notify Plaintiff that it intended to pursue Trusted Health, Inc. (“Trusted Health”) for the violations alleged in Plaintiff’s PAGA letters. Compl., at ¶ 4.

14. On December 15, 2023, after spending months engaging in fact investigation, including interviews with Plaintiff and review of documents and legal research regarding the alleged Labor Code violations, Plaintiff’s Counsel drafted and filed a representative action complaint (*Fleming v. Trusted Health, Inc.*, Case No. CGC223611120) in this Court. *Id.*

15. Following the filing of the PAGA Complaint, the Parties met and conferred regarding a proposed schedule for this case. Plaintiff also served written discovery on Trusted Health in August 2024. While discovery was pending, the Parties determined that it was an appropriate time to explore settlement.

16. On October 22, 2024, the Parties participated in an all-day mediation presided over by Jonathan D. Andrews, Esq., which ultimately resulted in the Settlement Agreement. As part of the mediation process, the Parties exchanged confidential mediation briefs in which each side carefully explained their view of the law and facts. The Parties also exchanged informal mediation related discovery, including the number of pay periods covered by the claims at issue in the case.

17. Even after the parties reached agreement, significant work remained. The Parties drafted and negotiated a Memorandum of Understanding and a long form settlement agreement, culminating in the Settlement Agreement attached hereto as **Exhibit A**.

Plaintiff's Counsel Represents Plaintiff on a Contingent Basis

18. Plaintiff's Counsel has represented Plaintiff and prospective PAGA Group members on a contingent basis. The firm's time and expenses in this action are discussed in more detail below.

19. Stueve Siegel Hanson undertook this representation of Plaintiff and prospective PAGA Group members to the exclusion of other paying work, devoting substantial time as well as advanced expenses to this litigation. The firm has not been compensated for the lodestar and expenses detailed below, which, as explained, are all fair and reasonable under the circumstances of this complex PAGA case.

Stueve Siegel Hanson's Time and Expenses

20. The regular and customary practice at Stueve Siegel Hanson is for all attorneys and paralegals to maintain contemporaneous time records setting forth the amount of time spent in six-minute increments on each task in each case with detailed time records. The time entries for prosecuting Plaintiff's claims against Trusted Health were recorded in the firm's time management system.

21. To calculate my firm's lodestar for this case, I collected the time entries through January 2025 and brought all hourly rates to current 2025 rates. Stueve Siegel Hanson timekeepers billed 98 hours to this case yielding a lodestar of \$83,492.50. The firm has also advanced \$10,171.90 in expenses in connection with the litigation.

22. I believe that all of the work by my firm was reasonable and necessary to achieve the resolution in this case. This includes the work my firm has devoted to prosecuting the claims of Plaintiff's and other travel nurses. Specifically, the time spent by my firm includes time spent on the following tasks: client intake and case evaluation; review of client materials including contracts and wage statements; preparation of the complaint in the present Action; preparation and review of the LWDA correspondence; active participation in the settlement process, a damages analysis, legal research, preparation of a mediation statement, and attendance in a full-day mediation; and work on the settlement approval process.

23. Further, the lodestar reflected in the chart below is under-inclusive. These hours do not account for the time spent by Plaintiff's Counsel in finalizing the Settlement Agreement and the accompanying motion papers, or time that will be spent preparing for the hearing and working with the Administrator to ensure prompt payment to PAGA Group members.

24. The following chart identifies each timekeeper, the number of hours expended, their 2025 standard hourly rate, and total lodestar:

Timekeeper	Position	Class Year	Hours	2025 Rate	Lodestar
J. Austin Moore	Partner	2011	16.50	\$1,050.00	\$17,325.00
Alexander T. Ricke	Partner	2012	32.10	\$975.00	\$31,297.50
Crystal Cook Leftridge	Associate	2013	4.40	\$775.00	\$3,410.00
Kate Marshall	Associate	2015	8.10	\$750.00	\$6,075.00
K. Ross Merrill	Associate	2015	30.50	\$750.00	\$22,875.00
Vong Phommachanh	Paralegal	--	4.40	\$400.00	\$1,760.00
Maggie Brulez	Paralegal	--	2.00	\$375.00	\$750.00
Total			98.00		\$83,492.50

25. As the above chart demonstrates, Stueve Siegel Hanson's timekeepers have expended 98 hours on this litigation, with a lodestar value at the firm's standard hourly rates of \$83,492.50. The hours set forth above do not reflect the additional work that the firm will have performed by the time of the hearing on Plaintiff's motion for PAGA settlement approval.

26. Combined with the lodestar from our co-counsel at Altshuler Berzon, Plaintiff's Counsel have advanced \$174,834.00 in lodestar and \$12,819.52 in expenses in furtherance of the PAGA Group members' interests. The requested one-third fee of \$333,33.33 thus results in a 1.90 multiplier on Plaintiff's Counsel's time, which will continue to decrease over time.

27. The attorneys and staff that participated in this matter on behalf of my firm are well-credentialed and highly experienced.

28. **J. Austin Moore** is a partner at Stueve Siegel Hanson and has significant experience representing consumers and workers in class action litigation. Mr. Moore has played key roles litigating many of the largest data breach cases in history, including helping secure the groundbreaking \$1.5 billion settlement in *In re: Equifax, Inc. Customer Data Security Breach*

1 *Litig.*, Case No. 1:17-md-2800-TWT (N.D. Ga.) and the \$500 million settlement in *In re: T-Mobile*
2 *Customer Data Security Breach Litig.*, No. 21-md-3019-BCW (W.D. Mo.) (final approval granted
3 in June 2023). Mr. Moore has served as class counsel in dozens of cases, including serving as co-
4 lead counsel in two cases against credit reporting agency Experian arising out of the agency's
5 reporting of delinquent loan accounts that resulted in settlements totaling \$29 million. *See Reyes v.*
6 *Experian Info. Sols., Inc.*, 2020 WL 5172713, at *1 (C.D. Cal. July 30, 2020) (granting final
7 approval to \$24 million settlement); *Smith v. Experian Info. Sols., Inc.*, 2020 WL 6689209, at *1
8 (C.D. Cal. Nov. 9, 2020) (granting final approval to \$5 million settlement). The *National Law*
9 *Journal* selected Mr. Moore as one of the "Rising Stars of the Plaintiff Bar" in its 2023 Elite Trial
10 Lawyers Awards. Mr. Moore has also been recognized by *Law360* as one of the "Top Attorneys
11 Under 40" in the country, named a "Rising Star" in class action law by *Super Lawyers*, and honored
12 as an "Up and Coming Lawyer" by *Missouri Lawyers Weekly*.

13 29. Mr. Moore was involved in the initial case evaluation and litigation strategy in
14 connection with the filing of the case and the settlement of the case. Mr. Moore and I have overseen
15 all of the firm's litigation on behalf of travel nurse clients. Due to the press of other business for
16 Mr. Moore, I assumed the lead partner status on this matter once we filed the PAGA case and began
17 settlement discussions.

18 30. **Crystal Cook Leftridge** has been an attorney at Stueve Siegel Hanson since
19 2013. Since obtaining her juris doctorate from the University of Kansas School of Law, she has
20 focused her practice on complex litigation in employment and mass torts. She has trial experience
21 in federal court and an in-depth understanding of the discovery phase of litigation. She works
22 closely with thousands of plaintiffs across the United States on employment and defective
23 pharmaceutical cases. Crystal plays a key role in litigating the class, collective, representative, and
24 individual actions on behalf of travel nurses our firm has filed across the country, similar to this
25 action. She's been named "Ones to Watch" by *Best Lawyers in America* in 2024 and 2025. In 2022,
26 *Missouri Lawyers Media* recognized her at the Women's Justice Awards with the "Litigation
27 Practitioner Award." She also received Missouri and Kansas *SuperLawyers'* Rising Star recognition
28 from 2019 to 2023. Mrs. Leftridge assisted with drafting the LWDA letter and the filing of the

PAGA Complaint. In addition to overall strategy development of the case, she primarily worked as the principal lawyer responsible for communicating with Plaintiff and kept her informed of the procedural changes throughout this litigation. Mrs. Leftridge has and will continue to work on the settlement portion of the case.

31. **K. Ross Merrill** is an attorney at Stueve Siegel Hanson with significant experience in class action litigation. He played key roles in securing historic settlements in the dairy industry, including by helping secure the \$55 million settlement in *Bishop v. DeLaval Inc.*, Case No. 5:19-CV-06129-SRB (W.D. Mo.) (final approval granted on July 20, 2022) and the \$122 million settlement in *Kruger v. Lely N. Am., Inc.*, Case No. 020CV00629KMMDTS (D. Minn.) (final approval granted on September 1, 2023). In those two class actions, Ross helped represent dairy farmers who purchased and were dissatisfied with their robotic milking systems. In addition, he has and continues to play key roles in litigating class, collective, and representative actions on behalf of travel nurses, including in two pending certified collective actions: *Hamilton v. NuWest Grp. Holdings, LLC*, No. C22-1117RSM (W.D. Wash.) and *Egan v. Fastaff, LLC*, Case No. 1:22-cv-03364 (D. Colo.). Before joining Stueve Siegel Hanson in 2020, Ross graduated law school in 2015 and served as an associate at an Am Law 200 law firm, where he started working on class action litigation. Mr. Merrill served as the day-to-day case manager for Plaintiff from the initial case investigation that led to this matter through the proposed settlement. Mr. Merrill was primarily responsible for researching the PAGA claims, drafting the Complaint, and aiding in the mediation and settlement process. He was also responsible for review of Plaintiffs' pay data and calculating Plaintiff's alleged damages and helping the Parties negotiate this proposed settlement.

32. **Kate Marshall** Kate has been an attorney at Stueve Siegel Hanson since 2020. She primarily focuses on legal research, e-discovery review, and the identification of key documents and materials for use in depositions, briefings and mediations for large-scale cases. Her work has contributed to settlements on behalf of dairy farmers in two cases: *Bishop v. DeLaval Inc.*, Case No. 5:19-CV-06129-SRB (W.D. Mo.) (final approval granted on July 20, 2022), and the \$122 million settlement in *Kruger v. Lely N. Am., Inc.*, Case No. 020CV00629KMMDTS (D. Minn.) (final approval granted on September 1, 2023). She has also contributed to the successful settlement

of an entangled complex litigation matter, *In re the Estate of Norman C Skalicky*, Court File No. 27-PA-PR-21-1643 (D. Minn.); *In re the Norman C Skalicky Revocable Trust Agreement U/A/D July 10, 2002*, Court File No. 27-TR-CV-22-24 (D. Minn.) (final approval granted on February 26, 2024). Mrs. Marshall primarily assisted with legal research and analysis in connection with arguments Trusted Health made during settlement discussions.

33. The hourly rates for these lawyers and professional staff are also reasonable. The hourly rates outlined above are the firm's rates for both contingent and non-contingent, hourly work. For example, in 2024, Mr. Hanson and I were engaged in an hourly, non-contingent employment matter where the client was billed at \$1,325 per hour for Mr. Hanson's time and \$925 per hour for Mr. Ricke's time (standard 2024 rates). Likewise, beginning in 2022 and continuing into 2023, Mr. Hanson and I were engaged in an hourly, non-contingent matter where the clients were billed at Mr. Hanson and Mr. Ricke's 2022 hourly rates of \$1,050 and \$675 per hour, respectively.

34. In addition, the firm's hourly rates have routinely been approved in connection with contested fee applications, lodestar attorneys' fees applications and lodestar cross-checks for attorneys' fees awarded as a percentage of a fund. *See, e.g., O'Dell v. Aya Healthcare*, -- F.Supp.3d --, 2024 WL 4510583, at * (S.D. Cal. Oct. 15, 2024) (finding on contested fee application that SSH's counsel's and staff's hourly rates, including Mr. Moore's 2024 rate of \$975 "reasonable" in a travel nurse case very similar to this one) (*see also* S.D. Cal. ECF No. 3:22-cv-01151-CAB-MMP, Doc No. 107-2, at 6); *Kruger v. Lely N. Am., Inc.*, 2023 WL 5665215, at *1 (D. Minn. Sept. 1, 2023) (approving fees as a percentage of the fund with partner hourly rates of up to \$1,225 and Mr. Merrill's 2023 billing rate at \$625); *Torretto v. Donnelley Fin. Sols., Inc.*, 2023 WL 123201, at *4 (S.D.N.Y. Jan. 5, 2023) (approving lodestar fee application of Stueve Siegel Hanson, which included Mr. Moore's 2022 rate of \$825); *Maldonado v. MGM Resorts International*, Case No. 1:20-CV-05599, Doc. 64 (D.N.J. July 6, 2022), Transcript of Final Approval Hearing at 15:5-16 (approving blended hourly rate of approximately \$725 per hour finding that "the lodestar is \$1,164,738 based on 1,600 hours of work by counsel ... The reasonable lodestar supports the approval of the fee as requested."); *Jackson County v. Trinity Industries, Inc.*, Case No. 1516-

CV23684, 2022 WL 4235745, at *2 (Mo. Cir. Ct. Aug. 30, 2022) (awarding Stueve Siegel Hanson and co-counsel \$11,400,000 in attorneys’ fees and costs in lodestar fee application and noting that “Class Counsel’s blended rate of \$662 per hour is reasonable based on the skill, experience, and reputation of counsel,” including Mr. Ricke’s standard hourly rate of \$675 in 2022); *In re Equifax Inc. Customer Data Sec. Breach Litig.*, 2020 WL 256132, at *39 (N.D. Ga. Jan. 13, 2020) (approving partner rates ranging from \$750-\$1,050 per hour in large-scale data breach class action with Stueve Siegel Hanson serving as Co-Lead Counsel); *Reyes v. Experian Info. Sols., Inc.*, 2020 WL 5172713, at *4 (C.D. Cal. July 30, 2020) (approving Stueve Siegel Hanson’s “sufficiently document[ed] and justifie[d]” hourly rates for purposes of cross-check, including Mr. Moore’s 2019 rate of \$700).

Stueve Siegel Hanson’s Litigation Expenses

35. Stueve Siegel Hanson has also advanced litigation costs and expenses in this case, which, to date, are uncompensated. The firm maintained accurate records of all such expenses, and based on those records, the firm has incurred the following costs and expenses, all of which would normally be billed to hourly, non-contingent, fee-paying clients:

Category	Cost
Meals	\$14.77
Arbitration/Mediation Fees	\$8,995.00
Westlaw	\$1,159.48
ESI Hosting	\$2.65
Total	\$10,171.90

36. As the chart demonstrates, altogether Stueve Siegel Hanson has expended \$10,171.90 in litigation expenses in furtherance of this matter. To the extent any additional expenses are incurred after the filing of this motion, the firm will submit any updated costs before the hearing. For example, I expect our co-counsel will incur an expense to electronically file these motions.

1 I declare under penalty of perjury, under the laws of the State of California, that the
2 foregoing is true and correct. Executed at Kansas City, Missouri, February 20, 2025.

3 By: /s/Alexander T. Ricke
4 Alexander T. Ricke
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