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8 Attorneys for Plaintiff REYNALDO LABO,  
on behalf of himself and others similarly situated

9 [Additional Counsel on Following Page]

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF VENTURA**

12 ALFONSO CEJA RUIZ, individually and on  
13 behalf of others similarly situated; and the  
CALIFORNIA LABOR AND WORKFORCE  
14 DEVELOPMENT AGENCY, a California  
governmental agency, *ex rel.* ALFONSO  
15 CEJA RUIZ,

16 Plaintiffs,

17 vs.

18 AUTOMOTIVE RACING PRODUCTS, INC.,  
a California corporation; RICHARD  
19 JACKSON, an individual; and DOES 1 through  
50, inclusive,

20 Defendants.

Case No. 2023CUOE011192

Judge: Hon. Charmaine H. Buehner

Department: 21

CLASS ACTION

**DECLARATION OF ROMAN SHKODNIK  
IN SUPPORT OF MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT, ATTORNEYS' FEES AND  
EXPENSES, AND INCENTIVE AWARD**

*[filed concurrently with Plaintiffs' Notice of  
Motion and Motion; Declaration of Hallie Von  
Rock; Declaration of Bryn Bridley of Atticus  
Administration; [Proposed] Order; [Proposed]  
Judgment]*

Date: August 13, 2025

Time: 8:30 a.m.

Dept.: 21

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1 I, Roman Shkodnik, declare as follows:

2 1. I am an attorney licensed and admitted to practice before all courts of the State of  
3 California, the United States District Courts for the Central, Southern, Eastern and Northern Districts  
4 of California, and the Ninth Circuit Court of Appeals. I have personal knowledge of the facts herein,  
5 and if called as a witness I could and would competently testify to them.

6 2. I am a senior attorney at the law firm of D.Law, Inc., co-counsel of record for  
7 Plaintiffs Reynaldo Labo and Alfonso Ceja Ruiz ("Plaintiffs") on behalf of themselves and others  
8 similarly situated against Defendant Automotive Racing Products, Inc. ("Defendant") (collectively  
9 with Plaintiffs, "the Parties").

10 3. I am one of the attorney who has been primarily responsible for the prosecution of the  
11 Plaintiffs' claims on behalf of the putative class against Defendant. My firm and I are referred to  
12 herein as "Class Counsel."

13 4. This Declaration is offered in support of Plaintiffs' motion for final approval of a  
14 settlement agreement negotiated and entered into at arm's length by the Parties herein.

15 **QUALIFICATIONS AND ADEQUACY OF CLASS COUNSEL**

16 5. My firm is well qualified because of our experience, knowledge, and resources to act  
17 as counsel and represent Plaintiffs and the putative class in this action. My practice is exclusively  
18 focused on employment matters, with a substantial percentage devoted to litigating wage, hour, and  
19 working-conditions violations on a class-wide basis.

20 6. I received my Bachelor of Arts in history and political science from the University of  
21 California, Los Angeles, in 2007. I then earned my Juris Doctorate from Loyola Law School in May  
22 of 2011. Upon graduating from law school, I have exclusively focused my practice on representing  
23 employees including in wage-and-hour class actions.

24 7. I have been practicing law since 2012. Since 2013, I have focused almost exclusively  
25 on representing employees, including in wage-and-hour class actions. During my career I have  
26 represented employees in over 100 wage-and-hour class action lawsuits as lead or co-lead counsel  
27 (including in the Central, Southern, Eastern and Northern Districts of California), and I have  
28 obtained six and seven figure settlements against a range of defendants, including Fortune 500

1 companies. These cases have involved the gamut of wage-and-hour claims, including claims for  
2 failure to pay minimum wages, unpaid wages and overtime, inaccurate pay statements, and failure to  
3 pay timely wages - similar to claims at issue in the present matter. During my career, I have  
4 represented employees in wage-and-hour class action lawsuits as lead or co-lead counsel, and I have  
5 obtained six and seven figure settlements against a range of defendants. These cases have involved  
6 the gamut of wage-and-hour claims, including claims for failure to pay minimum wages, unpaid  
7 wages and overtime, failure to provide meal breaks, inaccurate pay statements, and failure to pay  
8 timely wages - similar to claims at issue in the present matter.

9 8. I am experienced in prosecuting employment matters, particularly class actions. In  
10 addition to the present case, I am also class counsel for dozens of other putative wage-and-hour  
11 class-action lawsuits pending in various state and federal jurisdictions throughout California.

12 9. My extensive experience in litigating employment wage and hour matters has been  
13 integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and generally  
14 negotiating fair and reasonable class action settlements. Practice in the narrow field of wage and  
15 hour litigation requires skill and knowledge concerning the constantly evolving substantive law  
16 (state and federal), as well as the procedural law of class action litigation. In this action, I am fully  
17 equipped to use the skills and knowledge I have developed through more than a decade of  
18 prosecuting and defending wage and hour class actions to fairly and adequately represent the  
19 interests of the Class. Therefore, on the account of my resources, experience, and knowledge, I am  
20 well qualified to act as Class Counsel and represent Plaintiffs and the putative Class Members in this  
21 action.

22 10. Owing to my experience, I am well qualified to evaluate the class claims in this  
23 action, to evaluate settlement v. trial and defenses raised. The following are examples of some of my  
24 cases that have resulted in favorable settlements for the employee Class Members and Aggrieved  
25 Employees I have represented: (a) *Bogues v. Ikes place #6*, San Diego Superior Court, Case No. 37-  
26 2020-00023727-CU-OE-CTL (Hon. Robert Longstreth); (b) *Garcia v. Statewide Traffic Safety And*  
27 *Signs, Inc.*, Orange County Superior Court, Case No. 30-2018-01011814-CU-OE-CXC (Hon. Lon F.  
28 Hurwitz); (c) *Brito v. Brothers International Desserts dba Brothers International Desserts Inc.*,

1 Orange County Superior Court, Case No. 30-2022-01242515-CU-OE-CXC (Hon. William D.  
2 Claster); (d) *Valenzuela v. Best Express Foods, Inc.*, San Joaquin County Superior Court, Case No.  
3 STK-CV-UOE-2021-4131 (Hon. Robert T. Waters); (e) *Ruem v. EMTS, Inc. et al.*, Fresno County  
4 Superior Court, Case No. 18CECG04441 (Hon. Kimberly Gaab); (f) *Quizon v. CF Watsonville East,*  
5 *LLC.*, Santa Cruz County Superior Court, Case No. 20CV01868 (Hon. Paul Marigonda); (g) *Cesena*  
6 *v. JYM Enterprises, Inc.*, Los Angeles Superior Court, Case No. 21STCV27949 (Hon. Monica  
7 Bachner); (h) *In re Mobileone Wage And Hour Cases*, San Mateo Superior Court, Case No. JCCP  
8 5039 (Hon. Marie S. Weiner); (i) *Ly v. Prime Comms Retail, LLC*, Sacramento County Superior  
9 Court, Case No. 34-2020-00281668 (Hon. Christopher E. Krueger); (j) *Savattieri et al. v. AMI*  
10 *Expeditionary Healthcare et al.*, Los Angeles County Superior Court, Case No. 21STCV33372  
11 (Hon. Kenneth R. Freeman).

12 11. Attorney David Yeremian is a Managing Attorney at D.Law and counsel of record for  
13 Plaintiff Labo. Mr. Yeremian is licensed and admitted to practice before all courts of the State of  
14 California, the United States District Court for the Central, Southern, Eastern, and Northern Districts  
15 of California, and the Ninth Circuit Court of Appeals. Mr. Yeremian graduated from UC Berkeley in  
16 1997 and received his law degree and MBA from UCLA in 2001. He is a member of the Los  
17 Angeles County Bar Association and the California Employment Lawyers Association. He has been  
18 honored as a Super Lawyers Rising Star in 2009, 2010, 2012-2015. Mr. Yeremian has been named  
19 and honored as a Super Lawyer since 2016.

20 12. Mr. Yeremian is experienced in prosecuting employment matters, particularly class  
21 actions. In addition to the present case, he is also class counsel for dozens of other putative wage-  
22 and-hour class-action lawsuits pending in various state and federal jurisdictions throughout  
23 California.

24 13. Mr. Yeremian's extensive experience in litigating employment wage and hour matters  
25 has been integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and  
26 generally negotiating fair and reasonable class action settlements. Practice in the narrow field of  
27 wage and hour litigation requires skill and knowledge concerning the constantly evolving  
28 substantive law (state and federal), as well as the procedural law of class action litigation. In this

1 action, Mr. Yeremian is fully equipped to use the skills and knowledge he has developed through  
2 more than a decade of prosecuting and defending wage and hour class actions to fairly and  
3 adequately represent the interests of the Class. Therefore, on the account of Mr. Yeremian's  
4 resources, experience, and knowledge, he is well qualified to act as Class Counsel and represent  
5 Plaintiff and the putative Class Members in this action.

6 14. In the last several years Mr. Yeremian has had several contested class cases certified.  
7 When necessary, we pursue cases on appeal. Owing to his experience, Mr. Yeremian is well  
8 qualified to evaluate the class claims in this action, to evaluate settlement v. trial and defenses raised.  
9 He has negotiated over 100 class action settlements, including many involving the same issues  
10 presented in this case. A selection of cases wherein he has served as lead or co-lead class counsel  
11 includes: *Galavis v. Patina Restaurant Group, LLC* (LASC BC375225; class size approx. 10,000;  
12 co-lead counsel); *Milford v. ADT Security Services, Inc.* (CACD CV08-2236; class size approx.  
13 2,000; lead counsel); *Carreon v. Wolfgang Puck Catering and Events, LLC* (LASC BC398569; class  
14 size approx. 1,400; lead counsel); *Fluke v. RFG Oil, Inc.* (LASC BC403354; class size approx.  
15 1,400; lead counsel); *Urena v. Camachos Restaurant* (LASC BC365913; class size approx. 887; lead  
16 counsel); *Smith v. Rio Rancho Pontiac GMC Buick Inc.* (LASC BC391187; class size approx. 860;  
17 lead counsel); *Callela v. Dolce Group* (LASC BC364711; class size approx. 600; lead counsel);  
18 *Vasquez v. The Hollywood Pig n Whistle LP* (LASC BC335075; class size approx. 600; lead  
19 counsel); *Goldman v. Aorta Restaurant Operating LP* (LASC BC379688; class size approx. 300;  
20 lead counsel); *Sink-Crilly v. Centex Homes* (CACD CV09-2476; class size approx. 250; lead  
21 counsel); *Utley v. Cranbrook Partners Inc.* (LASC BC392813; class size approx. 200; lead counsel);  
22 *Garcia v. California Credits Group* (LASC BC353213; class size approx. 160; lead counsel);  
23 *Afanasyev v. Miller Infiniti, Inc.* (LASC BC350788; class size approx. 160; lead counsel); *Morris v.*  
24 *Gymboree, Inc.* (LASC BC393270; class size approx. 150; lead counsel); *Ortega v. AJC*  
25 *Sandblasting, Inc.* (LASC BC378806; class size approx. 140; lead counsel); *Lulejyan v. Jim Falk*  
26 *Motors of Beverly Hills, Inc.* (LASC BC398459; class size approx. 72; lead counsel); *Rylko v. The*  
27 *Griddle Café, Inc.* (LASC BC386126; class size approx. 70; lead counsel); *Healy v. Siemens IT*  
28

1 *Solutions and Services, Inc.* (Santa Clara Superior Court 108CV113479; class size approx 60; lead  
2 counsel).

3 15. Attorney Emma Geesaman is an Associate Attorney at D.Law, Inc. and counsel of  
4 record for Plaintiff Labo. Ms. Geesaman received her Bachelor of Arts in political science from  
5 Boston University in 2019. She then earned her Juris Doctorate from Case Western Reserve  
6 University Law School in May of 2023. Upon graduating from law school, she has exclusively  
7 focused her practice on representing employees including in wage-and-hour class actions.

### 8 CASE HISTORY

9 16. On July 10, 2023, Plaintiff Alfonso Ceja Ruiz commenced a Class Action by filing a  
10 Complaint in Ventura County Superior Court. On September 8, 2023, Plaintiff Ruiz filed a First  
11 Amended Complaint alleging causes of action against Defendant for: (1) Failure to Reimburse  
12 Necessary Business Expenditures under Labor Code § 2802; (2) Failure to Pay Minimum, Overtime,  
13 and Contractual Wages under Labor Code §§ 218.5, 510, 1194, and 1197; (3) Failure to Provide  
14 Accurate Wage Statements under Labor Code § 226; (4) Failure to Pay All Wages Due at Separation  
15 Under Labor Code § 203; (5) Restitution of All Wages Pursuant to Business & Professions Code §  
16 17200, *et seq.*; and (6) Violation of the California Private Attorneys General Act under Labor Code §  
17 2698, *et seq.* On February 27, 2024, Plaintiff Reynaldo Labo filed a Class Action Complaint in  
18 Ventura County Superior Court alleging causes of action against Defendant for (1) Failure to Pay  
19 Minimum Wages; (2) Failure to Pay Wages and Overtime under Labor Code § 510; (3) Failure to  
20 Pay Vacation Wages under Labor Code § 227.3; (4) Failure to Comply with Labor Code §§ 245 *et*  
21 *seq.*, and 246; (5) Meal Period Liability Under Labor Code § 226.7; (6) Rest Break Liability Under  
22 Labor Code § 226.7; (7) Violation of Labor Code § 226(a); (8) Violation of Labor Code § 203; and  
23 (9) Violation of Business & Professions Code § 17200 *et seq.* On February 27, 2024, Plaintiff Labo  
24 submitted a PAGA notice letter to the Labor Workforce Development Agency (“LWDA”) and  
25 served Defendant. The LWDA did not express interest in investigating Plaintiff’s claims within the  
26 65-day period. On May 2, 2024, Plaintiff Labo filed a First Amended Complaint adding a tenth  
27 cause of action for penalties under PAGA. On January 6, 2025, Plaintiffs filed a Second Amended  
28

1 Complaint adding Plaintiff Labo to the *Ruiz* Action and adding the allegations contained in Plaintiff  
2 Labo's FAC to the *Ruiz* Action.

3 17. The Settlement is the product of extensive arm's-length negotiations between the  
4 Parties. The Parties are represented by experienced class action attorneys who have actively litigated  
5 this matter since the commencement of the *Ruiz* Action. Prior to mediation, Class Counsel  
6 thoroughly investigated the facts and claims in both actions, including conducting extensive  
7 discovery and reviewing and analyzing time and pay records, Plaintiffs' personnel files, and relevant  
8 policies and documents. In order to reach the Settlement, the Parties debated, discussed, and resolved  
9 many difficult legal and factual issues. Moreover, during the process the Parties were required to  
10 make reasonable compromises in light of the facts, issues, and risks presented in this action. Class  
11 Counsel considered the uncertainty and risks of further litigation, and the difficulties inherent in such  
12 litigation. Class Counsel also considered the burdens of proof necessary to establish liability against  
13 Defendant and Defendant's defenses, the length and complexity of the trial itself, and the risks of  
14 further delays and expenses arising from possible appeals. Assessment of all of these factors  
15 indicated that the best interests of Class Members would be served by a settlement of this action in  
16 the manner and upon the terms set forth in the Amended Class Action and Private Attorneys General  
17 Act of 2004 ("PAGA") Settlement Agreement. *See* Declaration of Hallie Von Rock ("Von Rock  
18 Dec."), Ex. 1 ("Settlement Agreement").

19 18. To reiterate, under the terms of the proposed settlement, the amount available for  
20 distribution to Class Members who do not opt-out of the settlement is \$1,970,000 less the following  
21 deductions: (1) up to \$656,666.66 in attorneys' fees to Class Counsel and Class Counsel's costs and  
22 expenses up to \$25,000; (2) \$5,000.00 to Plaintiff Ruiz for Service Enhancement Payment; (3)  
23 \$7,500 to Plaintiff Labo for Service Enhancement Payment; (4) costs incurred by the settlement  
24 administrator to administer the settlement in the amount of \$11,000.00; and, (4) \$147,750 to the  
25 Labor and Workforce Development Agency (out of \$197,000 as allocated to the claim under the  
26 California Private Attorneys General Act).

27 19. From my experience in wage and hour litigation, the present settlement has resulted  
28 in a substantial benefit to Class Members. In fact, the average settlement share is **\$2,959.65 per**

1 **Class Member with a high payment of \$4,438.13.** (Declaration of Bryn Bridley of Atticus  
2 Administration filed concurrently herewith (“Atticus Decl.”), ¶ 19).

### 3 **CLAIMS ADMINISTRATION**

4 20. The claims process was fairly settled and administered. After preliminary approval,  
5 Atticus Administration, the claims administrator, sent the Notice of Proposed of Class Action  
6 Settlement and Hearing Date for Court Approval to the Class Members’ last-known addresses and  
7 made significant efforts to locate Class Members, including performing skip traces on those  
8 employees who could not be located. (Atticus Decl., ¶¶ 5-8 filed concurrently herewith).

9 21. Of the 364 Class Members who were sent notice, only 3 were ultimately deemed  
10 undeliverable after Atticus Administration conducted its due diligence. (*Id.* at ¶ 9.) As of the date  
11 of this declaration, **none have objected** to the settlement and **one Class Member has opted out.**  
12 (*Id.* at ¶¶ 14-16.)

13 22. The fact that there was a 99.73% participation rate indicates that the persons most  
14 affected by Defendant’s alleged practices and who stand to benefit most from the settlement  
15 agree that this is an outstanding result and a strong indication that the settlement is fair and  
16 adequate, and that Class Members found it to be so.

### 17 **REQUEST FOR ATTORNEYS’ FEES AND COSTS**

18 23. The preliminarily approved settlement calls for the payment of up to \$656,666.66 for  
19 attorneys’ fees, plus Class Counsel’s reasonable costs and expenses (Class Counsel’s actual costs in  
20 this matter are less as detailed below). This request is fair, reasonable, and adequate to compensate  
21 Class Counsel for the substantial work they have put into this case and the risk they assumed by  
22 taking it in the first place. The attorneys’ fees award is intended to reimburse Class Counsel for all  
23 uncompensated work that they have already done and for all the work they will continue to do in  
24 carrying out and overseeing the administration of the settlement.

25 24. Class Counsel’s lodestar calculation supports the requested attorneys’ fees. The  
26 lodestar calculation typically proceeds in three steps. First, a trial court must determine a baseline  
27 guide or “lodestar” figure based on the time spent and reasonable hourly compensation for each  
28 attorney involved in the case. *Serrano v. Priest* (1975) 20 Cal.3d 25, 48. The court then sets a  
8.

1 reasonable hourly fee to apply to the time expended, with reference to the prevailing rates in the  
2 geographical area in which the action is pending. *Bihun v. AT&T Information System* (1993) 13  
3 Cal.App.4th 976, 997. Finally, a “multiplier” is selected with reference to the following factors: (1)  
4 the novelty and difficulty of issues involved, (2) the skill displayed in presenting them, (3) the extent  
5 to which the nature of the litigation precluded other employment by the attorneys, and (4) the  
6 contingent nature of the fee award, based on the uncertainty of prevailing on the merits and of  
7 establishing eligibility for the award. *Serrano, supra*, 20 Cal.App.3d at 49.

8         25. Class Counsel charges rates commensurate with the prevailing market rates in the  
9 Contra Costa area for attorneys of comparable experience and skill handling complex litigation.  
10 Class Counsel conservatively estimates that it invested over 174.38 hours of attorney time in this  
11 matter. David Yeremian’s billing rate is \$1,150 per hour (24 years out of law school and is less than  
12 the Laffey Matrix rate of \$1,141.00), and he spent approximately 45.3 hours on this matter. Roman  
13 Shkodnik’s billing rate is \$900.00 (13 years out of law school, Laffey Matrix rate of \$948.00), and  
14 he spent approximately 82.5 hours on this matter. Emma Geesaman’s billing rate is \$450.00 (2 years  
15 out of law school, Laffey Matrix rate of \$473.00), and she spent approximately 28.5 hours on this  
16 matter. Former associate Robert Payaslyan’s billing rate is \$450 (4 years out of law school, Laffey  
17 Matrix rate of \$581) and he spent approximately 18.08 hours on this matter. The lodestar for D.Law,  
18 Inc. is \$147,306.00 (\$52,095 for David Yeremian’s time on the case, \$74,250 for Roman Shkodnik’s  
19 time on the case, \$12,825 for Emma Geesaman’s time on the case, and \$8,136 for Robert  
20 Payaslyan’s time on the case). See **Exhibits 1-4** (Roman Shkodnik’s Time and Task Summaries;  
21 David Yeremian’s Time and Task Summaries; Robert Payaslyan’s Time and Task Summaries; and  
22 Emma Geesaman’s Time and Task Summaries). Aside from being warranted by our skill, experience  
23 and ability, Class Counsel rates that were used in application of the lodestar cross check in this case,  
24 are supported by the Laffey Matrix attached hereto as **Exhibit “5.”** Rates for Class Counsel similar  
25 to those sought in this application have also been recently approved as reasonable market rates in  
26 Los Angeles and Riverside counties.

27         26. As for the *Serrano* factors, all militate in favor of the requested fee award. This case  
28 raised a number of complex and contested issues, and Class Counsel exhibited skill and creativity in  
9.

1 prosecuting and presenting them. Chief among these was the law relating to unpaid wages, and  
2 failure to pay class members final wages.

3 27. This case was not straightforward. Class Counsel had to spend time researching and  
4 analyzing each of these claims and issues in order to adequately assess the liability of Defendant.  
5 Class Counsel then had to develop the evidence necessary through informal discovery to establish  
6 Defendant's liability. This was done through carefully sifting through many pages of documents.

7 28. In sum, Class Counsel had to come up with creative approaches to these issues in  
8 litigating the case and, ultimately, negotiating and crafting the settlement. To this end, Class Counsel  
9 have devoted a tremendous amount of time and energy. Class Counsel have spent a substantial  
10 number of hours working on this case. This time commitment was necessary in order to research,  
11 construct and prosecute viable legal claims in the face of stiff opposition, but it has come at a cost. In  
12 particular, the time Class Counsel have devoted to this case has prevented them from taking on many  
13 other cases, including hourly work for which compensation for work done would have been more  
14 certain. They have also had to forgo a number of other potential employment matters that might have  
15 settled during the pendency of this litigation and yielded significant attorneys' fees. Despite these  
16 considerations, Class Counsel zealously represented Plaintiff and the class and have obtained a  
17 favorable result.

18 29. Such is not always the case. Indeed, Class Counsel have invested time and money  
19 into numerous other cases, including class actions, that have fizzled for one reason or another,  
20 leaving Class Counsel completely without any compensation for their effort. Here, Class Counsel  
21 has achieved a beneficial settlement for the class, but this was by no means a foregone conclusion;  
22 indeed their efforts might well have been frustrated by any number of obstacles with which they  
23 were presented along the way. Nor could class certification be guaranteed. In addition, Defendant  
24 could have exerted pressure on Plaintiffs to dismiss their claims by offering them individual  
25 settlements, an experience with which Class Counsel are not unfamiliar. However, Class Counsel  
26 was able to navigate the shoals of unpredictability to achieve a desirable result, and they have done  
27 so without receiving any compensation to speak of thus far because they took this case on a  
28 contingency-fee basis.

**The Percentage-of-the-Benefit Comparison**

30. In settlements where a definite monetized fund is created, it is appropriate for courts to evaluate the lodestar amount as a percentage of the recovery and adjust it accordingly if the lodestar differs from the range of percentage fees freely negotiated in comparable litigation. *See Lealao v. Beneficial Calif., Inc.* (2000) 82 Cal.App.4th 19, 49-50.

31. My firm took this case on a contingent-fee basis against a corporation represented by a reputable defense firm. When we take contingent cases, we must pay careful attention to the economics involved or one bad case can destroy years of work. Accordingly, in such cases, we anticipate that we shall, if successful, receive a fee that exceeds our normal hourly rate; otherwise the risk is often too great to bear. Even when we work long hours, the number of hours in a day is limited. Because of this, when we take on one particular matter, we are unable to take on other matters. When my firm became involved in this case, we realized the time commitment it would entail and were forced to turn down other matters that we otherwise should have been able to handle.

32. Contingent-fee cases present the very real risk of working hundreds if not thousands of hours that may never be entirely compensated. Moreover, while the case is being litigated, counsel must pay overhead (salaries, rent, etc.), provide for their own expenses, and in most cases pay the out-of-pocket expenses incurred on the plaintiff's behalf. And the prospect of a court-awarded fee does not greatly reduce the risk posed by these cases. In many cases, the prospect is nothing more than a potential that never materializes. First, you must win the case to get a court-awarded fee; even those cases that seem strongest at the onset can be lost and sometimes are lost. Second, there are always the pitfalls and unforeseen obstacles that arise along the way, such as settlement offers that the client may accept without ensuring that we receive a reasonable fee or changes in the law that substantially affect the merits of the case, or other uncertainties involving the client. Finally, there is the great risk inherent in advancing tens if not hundreds of thousands of dollars in out-of-pocket expenses. If that money were to be invested in some sort of financial investment, one would expect a reasonable rate of return on that investment. Here, however, the best we can hope to recover is our money, and then only if we are substantially successful; if we are not, all or part of this "investment" can be lost.

1           33.     Class Counsel is well acquainted with the contingent-fee market throughout  
2 California, particularly as it pertains to wage-and-hour and class-action litigation. Class Counsel has  
3 negotiated numerous contingency-fee agreements with plaintiffs, both as individuals and as  
4 representatives in class-action suits. Many of those agreements required that counsel receive a fee  
5 under certain scenarios that exceeds one-third of the recovery. Plaintiff Labo here signed a retainer  
6 agreement indicating that Class Counsel could receive a fee under certain scenarios that exceeds  
7 one-third of the recovery. Class Counsel's recent attorneys' fees awards in similar wage-and-hour  
8 class actions have been one-third of the recovery.

9           34.     On the contrary, defense firms are able to bill their clients on a monthly basis.

10          35.     Class counsel in contingency-fee cases typically receive attorneys' fees equal to or  
11 greater than a third of the gross settlement amount. *See, e.g., Evans et al. v. Coca-Cola* (Los Angeles  
12 County Sup.Ct. 2001 Case No. BC 220525 (Hon. Richard C. Hubbell)) (approving an award of  
13 attorney's fees of at least 33-1/3% of the settlement); *Moreno v. Miller Brewing* (Los Angeles  
14 County Sup. Ct. April 2004 BC 278170 (Hon. David M. Minning)) (same); and *Josiah Eaton, et al.*  
15 *v. Adolph Coors Company* (Orange County Sup. Ct. 2003 Case No. 01CC00140 (Hon. Stephen J.  
16 Sundvold)) (at least same award); *Daum v. Claim Jumper Restaurants* (Orange County Sup. Ct.  
17 2006 Case No. 02CC10201 (Hon. Ronald L. Bauer)) (final approval of same); *Moore v. IKEA* (Los  
18 Angeles County Sup. Ct. 2006 Case No. BC 263646 (Hon. Peter Lichtman)) (final approval of  
19 same); *Big Lots Overtime Cases* (San Bernardino County Sup. Ct. February 2004, JCCP Proceeding  
20 No. 4283 (Hon. Walter L. Blackwell, III)) (same); and *Fitzpatrick v. Baja Fresh* (Los Angeles  
21 Super. Ct. Case No. BC 265578 (Hon. Anthony J. Mohr)) (same). Thus, the fees requested in this  
22 case are in line with, if not less than, the fees routinely awarded in class action wage-and-hour cases.

23          36.     Indeed, California courts have approved attorney's-fee awards in excess of the  
24 benchmark of one-third of the settlement fund. *See Crandall v. U-Haul* (Los Angeles County Sup.  
25 Ct., Case No. BC178775), the Honorable Steven Czuleger awarded a 40% attorney fee request in an  
26 overtime-exemption class action; in *Bushnell v. Cremar, Inc.* (Orange County Sup. Ct., Case No.  
27 657778), the Honorable Donald E. Smallwood awarded attorneys' fees in the amount of 38%; in  
28 *Abzug v. Kerkorian* CA000981 (Los Angeles County Sup. Ct., November 1990), the Honorable R.

1 William Schoettler awarded a 45% fee; in *Haitz v. Meyer, et al.*, Alameda County Sup. Ct., 8-20-  
2 1990 No. 572968-3, the court awarded a 40% fee; in *Elliott v. Clothestime* (Orange County Sup. Ct.,  
3 Case No. 01-CC00333) the Honorable Jonathan Cannon awarded a 40% fee in a wage-and-hour  
4 class action which had not yet proceeded to the class certification stage; in both *Rippee v. Boston*  
5 *Market Corporation*, Case No.: 05 CV 1359 BTM (JMA) and *Barile v. Boston Market Corporation*,  
6 Case No.: 05 CV 1360 BTM (JMA), the Honorable Judge Barry T. Moskowitz awarded a 40% fee to  
7 plaintiffs' counsel in wage-and-hour class actions that had not proceeded to the class-certification  
8 stage.

9 37. In light of the foregoing, the fee request in an amount equal to \$656,666.66 in this  
10 case is well within the bounds that have been established by the above-cited authority. Defendant has  
11 no objection to an award of fees in the amount requested. Moreover, the Class Notice mailed to  
12 Class Members stated the amount of fees requested by Class Counsel; however, not a single Class  
13 Member has objected to an award of fees in the amount requested.

#### 14 Costs

15 38. As of the date of the filing of the instant motion, my firm has costs of \$9,697.03. *See*  
16 Class Counsel's Cost Log attached hereto and incorporated herein as **Exhibit "6."** Class Counsel  
17 incurred costs including, but not limited to, filing fees (e.g. complaints, request for dismissal,  
18 motions), service of process, expert analysis fees, and attorney-service costs for court filings.

#### 19 **ENHANCEMENT PAYMENT TO NAMED PLAINTIFFS ARE REASONABLE**

20 39. Plaintiffs are entitled to reasonable service payments for their efforts and initiative in  
21 bringing and helping to litigate this action. Plaintiffs assumed great risk by challenging Defendant's  
22 wage-and-hour policies and bringing suit against Defendant. Plaintiffs spent time better apprising  
23 themselves of their rights, deciding whether remedial action should be taken, how it should be taken,  
24 searching for attorneys, and finally contacting their attorneys, who spent many hours with them  
25 discussing their case and the law. In the end, Plaintiffs decided to vindicate not only their own rights  
26 but also those of their fellow employees by filing a class action lawsuit.

27 40. The courage it took to stand up to Defendant in this way should not be  
28 underestimated. Few people want to file lawsuits, especially against their employer. This aversion

1 was and is especially keen in today's economic climate, where remunerative work has been hard to  
2 come by. By suing their former employer, Plaintiffs increased the risk of retaliation by prospective  
3 employers. Plaintiffs' willingness to sue their former employer may not be lost on a prospective  
4 employer who has to choose between an applicant who has never sued a prior employer and one who  
5 has. This risk is particularly real in the information age, where employers can, more easily than ever,  
6 perform background checks of prospective employees, sometimes with the stroke of a key. But  
7 Plaintiffs did not allow their fears of the potential repercussions of being a class representative deter  
8 them from acting for the benefit of Class Members.

9         41. Plaintiff Labo was intimately involved in this matter from the start. He has devoted a  
10 substantial amount of time to helping Class Counsel effectively develop and prosecute this action at  
11 every stage of the litigation. Plaintiff Labo conferred with Class Counsel on numerous occasions to  
12 discuss every aspect of this case; provided information about Defendant; reviewed documents;  
13 produced documents; monitored the progress of the litigation; took the time to apprise himself of the  
14 facts, issues and law regarding the claims at issue, spent time with Class Counsel discussing the  
15 terms of the settlement and reviewed and executed the Settlement and Amended Settlement, and  
16 assisting in preparing a declaration and supplemental declaration for preliminary approval. In all,  
17 Plaintiff Labo estimates that he devoted numerous hours in preparing the Action and seeing it  
18 through to settlement.

19         42. Plaintiff Labo spent a significant amount of time with Class Counsel detailing his  
20 knowledge of Defendant's practices and assisting in the prosecution of this action. He has diligently,  
21 adequately, and fairly represented Class Members and has not placed his interests above any  
22 member of the putative class. Class Counsel believes that Plaintiff Labo is entitled to an  
23 enhancement award for the time and effort he has devoted to this case. Defendant has agreed not to  
24 oppose the enhancement award. Such payments to class representatives are a common feature of  
25 settlements negotiated by Class Counsel, and trial courts routinely approve them. In light of the  
26 foregoing, Class Counsel believes the incentive award of \$7,500.00 (seven thousand five hundred  
27 dollars) to Plaintiff Labo is fair and reasonable.

28         43. California trial courts routinely approve enhancement payments to class

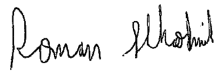
1 representatives in wage-and-hour class-action settlements. *See, e.g., Bennett v. Countrywide*  
2 *Financial Corporation* (2005) San Diego Sup. Ct. Case No. GIC840981 (\$35,000); *Hogue v. WH*  
3 *Smith of Nevada, Inc.* (2004) San Diego Sup. Ct. Case No. GIC830653 (\$20,000); *Fiez v. Brown*  
4 *Group Retail Inc., d.b.a. Famous Footwear* (2003) Orange County Sup. Ct. Case No. 01CC00381  
5 (\$35,000 to current employee of defendant and \$20,000 to former employee); *Barry v. Cost Plus,*  
6 *Inc.* (2003) OCSC No. 01CC00380 (\$35,000 for each named plaintiff); *Lajoie v. The Picture People,*  
7 *Inc.* (2003) Orange County Sup. Ct. Case No. OICC00324 (\$25,000 each for two named plaintiffs);  
8 *Franco v. Vans, Inc.* (2002) Orange County Sup. Ct. Case No. 01CC03995 (\$35,000 for each named  
9 plaintiff); *Crandall v. U-Haul Corporation* (2001) Los Angeles Sup. Ct. Case No. BC 178775  
10 (\$20,000 for each named plaintiff); *Joel v. Athlete's Foot Group* (2001) Los Angeles Sup. Ct. Case  
11 No. BC 234231 (\$25,000). Plaintiff Labo's enhancement request is substantially less than the  
12 enhancements approved in these cases; therefore, it is reasonable.

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

15 ///

16 ///

17 Executed this 22<sup>nd</sup> day of July, 2025 at Glendale, California.

18 

19 \_\_\_\_\_  
Roman Shkodnik

# EXHIBIT 1

| Tasks Performed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Atty Hours Est. | Date range    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------|
| <u>1. Pre-Filing and Investigation Tasks –</u> <ul style="list-style-type: none"> <li>Complaint research and research case law and other cases, and research Defendant and its operations and prior litigations</li> <li>Confer with client and review documents with client, including personnel file request and production – send records request and confer with Client and Defendant regarding personnel file</li> <li>Set up file and documents, including atty-client agreement, responsibilities of a class rep. and wage statements and personnel file documents</li> <li>Research California Secretary of State filings for Defendant</li> <li>Conduct factual and legal research into the merits of Plaintiff’s claims</li> <li>Researching similar wage class actions</li> <li>Conduct multiple conferences discussing the facts and allegations with Plaintiff, addressing conduct of litigation, time frame for events and initial actions to commence litigation</li> </ul> | 5.5             | February 2024 |
| <u>2. Filing the Complaint and Drafting and Sending the LWDA Letter Notice</u> <ul style="list-style-type: none"> <li>Conduct further research regarding Defendant and policies and practices and confer with client and draft detailed file notes;</li> <li>Draft Class Action Complaint and allegations</li> <li>Draft LWDA Letter and correspondence to LWDA and Defendant re: PAGA Notice and claims and facts and theories and grounds for recovering civil penalties</li> <li>Confer and correspond with client regarding Complaint and review and approval of factual allegations and attend to filing</li> </ul>                                                                                                                                                                                                                                                                                                                                                                   | 7.5             | February 2024 |
| <u>3. Amend Complaint for PAGA Claim</u> <ul style="list-style-type: none"> <li>Filing Complaint for PAGA Claim and service</li> <li>Review Complaint with the client</li> <li>Revise complaint</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 5               | May 2024      |

**Detailed Time and Task Summary** – Roman Shkodnik

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |    |             |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-------------|
| <p>4. Initial conferences and correspondence with Defendant’s counsel,<br/><u>Initial scheduling conference and case initiation requirements</u></p> <ul style="list-style-type: none"><li>• Review case initiation documents and conformed copies, and review initial Case Management Conference order and draft notice of CMC</li><li>• Speak with managing associate regarding status of pleadings and procedure</li><li>• Confer and correspond with process server regarding service on Defendant and status and documents to provide</li><li>• Conduct multiple conferences with Client and exchange e-mails regarding ongoing experiences as an employee of Defendant and evidencing claims</li><li>• Continue compiling case documents from Plaintiff and case research regarding the applicable authorities and claims and Defendant’s policies and operations</li><li>• Conduct teleconferences and exchange correspondence regarding claims and Defendant’s and its operations and the case and claims</li><li>• Draft multiple correspondences to Defense counsel regarding case and conference and appearance and discovery</li><li>• Conduct further investigation into the claims, and conferences with client regarding same and documents supporting allegations</li></ul> | 10 | August 2024 |
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**Detailed Time and Task Summary** – Roman Shkodnik

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |   |                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|------------------------------|
| <p><u>5. Potential ADR Discussions and formal and initial informal discovery requests</u></p> <ul style="list-style-type: none"><li>• Multiple conferences with managing associate and associate regarding case procedural steps and potential mediation</li><li>• Speak with managing associate and associate regarding informal discovery requests</li><li>• Prepare formal and informal discovery requests and confer and correspond with Defendant Automotive Racing Products, Inc. (“Defendant”)’s counsel ’s counsel regarding them and responsive information and documents</li><li>• Confer and correspond with Defendant’s and mediators regarding mediator selection and availability and scheduling</li><li>• Multiple conferences with managing associate and associate regarding informal discovery requests re status of case, procedural next steps, discovery status and mediation preparation</li><li>• Review multiple correspondences from Plaintiff regarding ongoing claims and issues to address with Defendant</li><li>• Review stipulations and file all documents regarding conferences and case management dates and continuances for mediation</li><li>• Confer with statistical analysis expert and associate regarding production and review and information and items needed to provide conclusions and recommendations and provide documents to him; discuss case claims and approach to damages</li></ul> | 6 | February 2024<br>– June 2024 |
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**Detailed Time and Task Summary** – Roman Shkodnik

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|--------------------------|
| <p><u>6. Complete Initial Informal Discovery, Mediation Preparation, and Conduct Mediation and further discovery meet and confer –</u></p> <ul style="list-style-type: none"><li>• Review all production and file documents and policy documents and compile key exhibits and documents for mediation</li><li>• Confer and correspond with Defendant’s counsel regarding Class Member’s data and numbers agreed upon and extrapolated for mediation</li><li>• Complete and draft calculations of Defendant’s potential liability exposure and summarize defenses to each and alleged bases for reduction in calculated numbers</li><li>• Review mediation brief, address background and procedure and discovery completed, address relevant policies of Defendant and each of Plaintiff’s claims, and the facts and law supporting them, and research and calculate potential estimated damages and penalties exposure</li><li>• Multiple conferences with managing associate and associate regarding preparation for mediation</li><li>• Conduct full day mediation on Zoom. Complete conferences with defense counsel regarding Settlement and general terms.</li><li>• confer regarding continued efforts to finalize settlement terms. Agree to and address general terms for settlement and begin drafting agreement</li></ul> | 16.5 | May 2024-June 2024       |
| <p><u>7. Finalizing Settlement Agreement and Terms –</u></p> <ul style="list-style-type: none"><li>• Draft and correspond with Defense counsel regarding Memorandum of Agreement and attend to finalizing and executing</li><li>• Multiple conferences with managing associate and associate regarding Memorandum of Agreement and long form settlement agreement</li><li>• Draft long form Settlement Agreement and conduct multiple conferences and correspondence with defense counsel regarding detailed terms and revisions</li><li>• Multiple correspondence and conferences with defense counsel regarding settlement terms and revisions and additions</li><li>• Draft Class Member’s Notice and e-mails regarding same and finalizations after editing</li><li>• Confer with administrators and receive quotations and agree on estimate and administrator</li><li>• Conduct multiple conferences with Plaintiff regarding Settlement and terms and responding to his questions and concerns</li><li>• Finalize Settlement Agreement and attend to execution and confer and correspond with Plaintiff regarding same</li></ul>                                                                                                                                                                                             | 10   | June 2024 – January 2025 |

**Detailed Time and Task Summary** – Roman Shkodnik

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                  |                             |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-----------------------------|
| <b>8. Motion for Preliminary Approval, Hearing, and Begin Administration:</b> <ul style="list-style-type: none"><li>• Review draft of motion for preliminary approval of the Settlement, and supporting documents and declarations and attend to filing</li><li>• Multiple conferences with managing associate and associate regarding motion for preliminary approval of the Settlement, and supporting documents</li><li>• Conduct multiple conferences and exchange correspondence with defense counsel regarding MPA documents and revisions as required.</li><li>• Continue to receive and respond to inquiries from Class members</li></ul>                                                                                                                   | 10               | January 2025-<br>April 2025 |
| <b>9. Initiate and Complete Settlement Administration –</b> <ul style="list-style-type: none"><li>• Multiple conferences with managing associate and associate regarding administration</li><li>• Confer and correspond with Administrator regarding website for case and getting it set up and posting the documents to it</li><li>• Address questions regarding administration and review weekly administration reports, and draft correspondence regarding same</li></ul>                                                                                                                                                                                                                                                                                        | 2                | April 2025 –<br>June 2025   |
| <b>10. Motion for Final Approval of Settlement –</b> <ul style="list-style-type: none"><li>• Review all final approval motion documents, including declarations.</li><li>• Confer and correspond with Plaintiff regarding declaration and enhancement.</li><li>• Finalize and filing motion for final approval documents, including motion and memorandum and all supporting declarations and proposed order/judgment.</li><li>• Motion for attorneys’ fees and expenses and attending additional hearings.</li><li>• Also anticipated hours responding to inquiries from Class Members regarding the settlement and checks, drafting declarations to comply with the Court’s requirement for a compliance hearing, and attendance at any further hearing</li></ul> | 10               | July 2025-<br>Present       |
| <b>TOTAL:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>82.5 Hrs.</b> |                             |

# EXHIBIT 2

| Tasks Performed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Atty Hours Est. | Date range                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------------------|
| <u>1. Pre-Filing and Investigation Tasks –</u> <ul style="list-style-type: none"> <li>Conference with client; review client docs; interview re: facts of case</li> <li>Research case law and other cases, and research Defendant Automotive Racing Products, Inc. (“Defendant”) and their operations and prior litigations</li> <li>Draft retainer and opening file documents</li> <li>Meet with associate to discuss facts, documents produced by client and legal claims</li> <li>Reviewed associate’s factual and legal research into the merits of Plaintiff’s claims</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                       | 7               | February 2024             |
| <u>2. Filing the Complaint and Drafting and Sending the LWDA Letter Notice</u> <ul style="list-style-type: none"> <li>Review and revise Complaint and LWDA letter; confer with staff re same</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 1               | February 2024             |
| <u>3. Complaint for PAGA Claim</u> <ul style="list-style-type: none"> <li>Review and revise Complaint to add PAGA Claim and service.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1               | May 2024                  |
| <u>4. Initial conferences and correspondence with Defendant’s counsel, Initial scheduling conference and case initiation requirements</u> <ul style="list-style-type: none"> <li>Review case initiation documents, conformed copies, and review initial Case Management Conference order and draft notice of CMC</li> <li>Confer with staff re status of pleadings and procedure</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3               | August 2024               |
| <u>5. Potential ADR Discussions and initial formal and informal discovery requests</u> <ul style="list-style-type: none"> <li>Confer with defense counsel and exchange e-mails regarding decision to proceed with mediation and status of discovery and how to approach in light of agreement</li> <li>Multiple conferences with associates to discuss case procedural steps and potential mediation</li> <li>Review and revise informal discovery requests and confer with staff re same</li> <li>Confer and correspond with Defendant’s counsel and mediators regarding mediator selection and availability and scheduling</li> <li>Multiple conferences with staff and associate re status of case, procedural next steps, discovery status and mediation preparation</li> <li>Confer with statistical analysis expert regarding production and review and information and items needed to provide conclusions and recommendations and provide documents to him; discuss case claims and approach to damages</li> </ul> | 6               | February 2024 – June 2024 |
| <u>6. Complete Initial Informal Discovery, Mediation Preparation, and Conduct Mediation and further discovery meet and confer –</u> <ul style="list-style-type: none"> <li>Complete informal discovery and production of documents and Class Member’s data</li> <li>Review all production and file documents and policy documents</li> <li>Confer and correspond with Defendant’s counsel regarding Class</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 17              | May 2024-June 2024        |

**Detailed Time and Task Summary** – David Yeremian

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                  |                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|--------------------------|
| Member's data and numbers agreed upon and extrapolated for mediation <ul style="list-style-type: none"><li>• Multiple conferences with expert regarding conclusions and damage calculations</li><li>• Review and revise mediation brief</li><li>• Multiple conferences with staff and associates in preparation for mediation</li><li>• Conference with client re preparation for mediation</li><li>• Attend mediation</li><li>• Conferences with defense counsel regarding Settlement and general terms</li><li>• Review correspondence following mediation with mediator and confer regarding continued efforts to finalize settlement terms</li></ul> |                  |                          |
| <u>7. Finalizing Settlement Agreement and Terms</u> – <ul style="list-style-type: none"><li>• Review and revise Memorandum of Agreement; conferences with staff re same</li><li>• Review and revise long form Settlement Agreement and conduct multiple conferences with staff re same</li><li>• Review Class Members Notice and e-mails regarding same and finalizations after editing</li><li>• Review administrator quotations and discuss with staff</li></ul>                                                                                                                                                                                       | 3                | June 2024 – January 2025 |
| <u>8. Motion for Preliminary Approval, Hearing, and Begin Administration–</u> <ul style="list-style-type: none"><li>• Review and revise motion for preliminary approval of the Settlement, and supporting documents</li><li>• Review court's tentative ruling and discuss with staff</li><li>• Review Court's Order granting preliminary approval after entry and provide to Administrator to begin administration process.</li></ul>                                                                                                                                                                                                                    | 3                | January 2025- April 2025 |
| <u>9. Initiate and Complete Settlement Administration</u> – <ul style="list-style-type: none"><li>• Multiple conference with staff re status of administration</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 1.3              | April 2025 – June 2025   |
| <u>10. Motion for Final Approval of Settlement</u> – <ul style="list-style-type: none"><li>• Review and revise final approval motion documents, including declarations</li><li>• Review entire file, emails, and compile time summary</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                          | 3                | July 2025- Present       |
| <b>TOTAL:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>45.3 Hrs.</b> |                          |

# EXHIBIT 3

| Tasks Performed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Atty<br>Hours Est. | Date range    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|---------------|
| <p><u>1. Potential ADR Discussions and formal and initial informal discovery requests</u></p> <ul style="list-style-type: none"> <li>• Confer with defense counsel and exchange e-mails regarding decision to proceed with mediation and status of discovery and how to approach in light of agreement</li> <li>• Multiple conferences with managing associate and senior associate regarding case procedural steps and potential mediation</li> <li>• Speak with managing associate and senior associate regarding informal discovery requests</li> <li>• Draft and serve informal discovery requests and confer and correspond with Defendant's counsel regarding them and responsive information and documents</li> <li>• Confer and correspond with Defendant's and mediators regarding mediator selection and availability and scheduling</li> <li>• Agree upon mediator for mediation and draft multiple e-mails and respond regarding scheduling</li> <li>• Book mediation and begin preparation after finalizing scheduling based on parties and counsel schedules and availability and that of the mediator</li> <li>• Confer with Plaintiff regarding mediation and availability, and review multiple correspondences from Plaintiff regarding ongoing claims and issues to address with Defendant</li> <li>• Multiple conferences with managing associate and senior associate regarding informal discovery requests re status of case, procedural next steps, discovery status and mediation preparation</li> <li>• Draft stipulations and file all documents regarding conferences and case management dates and continuances for mediation</li> <li>• Confer with statistical analysis expert and managing associate and senior associate regarding production and review and information and items needed to provide conclusions and recommendations and provide documents to him; discuss case claims and approach to damages</li> </ul> | 10                 | February 2024 |

**Detailed Time and Task Summary** – Robert Payaslyan

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                   |                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|--------------------|
| <b><u>2. Complete Initial Informal Discovery, Mediation Preparation, and Conduct Mediation and further discovery meet and confer –</u></b> <ul style="list-style-type: none"><li>• Draft correspondence with Defendant’s counsel and mediator regarding mediation and scheduling</li><li>• Complete informal discovery and production of documents and Class Member’s data</li><li>• Review all production and file documents and policy documents and compile key exhibits and documents for mediation</li><li>• Confer and correspond with Defendant’s counsel regarding Class Member’s data and numbers agreed upon and extrapolated for mediation</li><li>• Complete and draft calculations of Defendant’s potential liability exposure and summarize defenses to each and alleged bases for reduction in calculated numbers</li><li>• Conduct case law review and research regarding accurate wage statements</li><li>• Draft mediation brief, address background and procedure and discovery completed, address relevant policies of Defendant and each of Plaintiff’s claims, and the facts and law supporting them, and research and calculate potential estimated damages and penalties exposure</li><li>• Multiple conferences with managing associate and senior associate regarding preparation for mediation</li><li>• Conduct full day mediation on Zoom. Complete conferences with defense counsel regarding Settlement and general terms.</li><li>• Draft correspondence following mediation with mediator and confer regarding continued efforts to finalize settlement terms. Agree to and address general terms for settlement and begin drafting agreement</li></ul> | 8.08              | May 2024-June 2024 |
| <b>TOTAL:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>18.08 Hrs.</b> |                    |

# EXHIBIT 4

| Tasks Performed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Atty Hours Est. | Date range               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--------------------------|
| <u>1. Finalizing Settlement Agreement and Terms –</u> <ul style="list-style-type: none"> <li>Review long form Settlement Agreement and conduct multiple conferences and correspondence with defense counsel regarding detailed terms and revisions</li> <li>Multiple correspondence and conferences with defense counsel regarding settlement terms and revisions and additions</li> <li>Review Class Member’s Notice and e-mails regarding same and finalizations after editing</li> <li>Confer with administrators and receive quotations and agree on estimate and administrator</li> <li>Conduct multiple conferences with Plaintiff regarding Settlement and terms and responding to his questions and concerns</li> <li>Finalize Settlement Agreement and attend to execution and confer and correspond with Plaintiff regarding same</li> </ul>                                                                                                                                                                                                                   | 1.5             | July 2024 – January 2025 |
| <u>2. Motion for Preliminary Approval, Hearing, and Begin Administration:</u> <ul style="list-style-type: none"> <li>Draft motion for preliminary approval of the Settlement, and supporting documents and declarations and attend to filing</li> <li>Multiple conferences with managing associate and senior associate regarding motion for preliminary approval of the Settlement, and supporting documents</li> <li>Conduct multiple conferences and exchange correspondence with defense counsel regarding MPA documents and revisions as required.</li> <li>Continue to receive and respond to inquiries from Class members</li> <li>Confer with Court and Defendant’s counsel regarding Settlement and terms after reviewing the Court’s tentative ruling granting preliminary approval</li> <li>Go through process of obtaining conformed copy of Order as entered and correspond with service regarding doing so</li> <li>Review Court’s Order granting preliminary approval after entry and provide to Administrator to begin administration process</li> </ul> | 10              | January 2025- April 2025 |

**Detailed Time and Task Summary** – Emma Geesaman

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                  |                        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|------------------------|
| <b>3. <u>Initiate and Complete Settlement Administration</u> –</b> <ul style="list-style-type: none"><li>• Confer and correspond with defense counsel and Administrator regarding settlement administration, class data, and initial mailing</li><li>• Attend to initial mailing and correspondence with administrator regarding same</li><li>• Address administration timeline and initial calculations with administrator in e-mails and conferences</li><li>• Multiple conferences with managing associate and senior associate regarding administration</li><li>• Confer and correspond with Administrator regarding web-site for case and getting it set up and posting the documents to it</li><li>• Address questions regarding administration and review weekly administration reports, and draft correspondence regarding same</li><li>• Receive and respond to calls and correspondence from Class members regarding Settlement and terms and coverage and entities to which it applied</li></ul>                                             | 3.5              | April 2025 – June 2025 |
| <b>4. <u>Motion for Final Approval of Settlement</u> –</b> <ul style="list-style-type: none"><li>• Complete administration and confer and correspond with administrator regarding final approval and administration declaration</li><li>• Draft all final approval motion documents, including declarations.</li><li>• Confer and correspond with Plaintiff regarding declaration and enhancement.</li><li>• Complete lodestar cross check and confer and correspond with Defense counsel regarding document drafts and required revision.</li><li>• Finalize and filing motion for final approval documents, including motion and memorandum and all supporting declarations and proposed order/judgment.</li><li>• Motion for attorneys’ fees and expenses and attending additional hearings.</li><li>• Also anticipated hours responding to inquiries from Class Members regarding the settlement and checks, drafting declarations to comply with the Court’s requirement for a compliance hearing, and attendance at any further hearing</li></ul> | 13.5             | July 2025- Present     |
| <b>TOTAL:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>28.5 Hrs.</b> |                        |

# EXHIBIT 5

# LAFFEY MATRIX

[History](#)
[Case Law](#)
[See the Matrix](#)
[Contact us](#)
[Home](#)

|                  |                      |                         | Years Out of Law School * |       |       |       |        |
|------------------|----------------------|-------------------------|---------------------------|-------|-------|-------|--------|
| Year             | Adjustmt<br>Factor** | Paralegal/<br>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 Laffey 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)

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

# EXHIBIT 6

## Labo v. Automotive Racing Products

### Litigation Costs

| Date       | Details                                                                                                                | Provider                | Amount      |
|------------|------------------------------------------------------------------------------------------------------------------------|-------------------------|-------------|
| 02/27/2024 | PAGA Letter                                                                                                            | LWDA                    | \$ 75.00    |
| 02/27/2024 | Summons & Complaint                                                                                                    | Rapid Legal             | \$ 1,658.30 |
| 02/27/2024 | PAGA Postage                                                                                                           | LWDA                    | \$ 19.58    |
| 03/07/2024 | Process of Service - ARP                                                                                               | Rapid Legal             | \$ 77.25    |
| 03/08/2024 | Process of Service - Automotive Racing Products, Inc.                                                                  | Rapid Legal             | \$ 77.25    |
| 03/08/2024 | POS of Summons - ARP                                                                                                   | Rapid Legal             | \$ 92.70    |
| 03/11/2024 | POS of Summons - Automotive Racing Products, Inc.                                                                      | Rapid Legal             | \$ 92.70    |
| 03/29/2024 | Notice of Complex Determination & Case Management Conference 4.17.24                                                   | Rapid Legal             | \$ 128.75   |
| 04/15/2024 | Joint Case Management Statement; Notice of Remote Appearance; Notice of Posting Jury Fees                              | Rapid Legal             | \$ 283.25   |
| 04/18/2024 | CourtCall Appearance 4.17.24                                                                                           | CourtCall               | \$ 72.00    |
| 05/03/2024 | First Amended Complaint                                                                                                | Rapid Legal             | \$ 180.25   |
| 06/06/2024 | Expert Analysis Fee                                                                                                    | Berger Consulting Group | \$ 5,120.00 |
| 07/10/2024 | ADR Services                                                                                                           | ADR Services, Inc.      | \$ 675.00   |
| 08/08/2024 | Further Joint Case Management Statement 8.15.24                                                                        | Rapid Legal             | \$ 128.75   |
| 08/09/2024 | CourtCall Appearance                                                                                                   | CourtCall               | \$ 72.00    |
| 08/12/2024 | Notice of Remote Appearance & Proposed Order 8.15.24                                                                   | Rapid Legal             | \$ 128.75   |
| 08/14/2024 | Proposed Order Re Joint Statement                                                                                      | Rapid Legal             | \$ 128.75   |
| 08/20/2024 | Notice of Disassociation of Robert P.                                                                                  | Rapid Legal             | \$ 128.75   |
| 08/22/2024 | CourtCall Appearance 8.28.24                                                                                           | CourtCall               | \$ 72.00    |
| 11/05/2024 | Notice of Change of Address; Stipulation & Proposed Order to Continue Case Management Conference & Order to Show Cause | Rapid Legal             | \$ 149.35   |
| 12/16/2024 | Notice of Unavailability                                                                                               | Rapid Legal             | \$ 16.74    |
| 01/29/2025 | Notice of Remote Appearance 1.30.24                                                                                    | Rapid Legal             | \$ 16.74    |
| 01/31/2025 | Notice of Remote Appearance 1.30.24                                                                                    | Rapid Legal             | \$ 16.74    |
| 02/13/2025 | CourtCall Appearance                                                                                                   | CourtCall               | \$ 72.00    |
| 02/14/2025 | Notice of Remote Appearance 2.21.25                                                                                    | Rapid Legal             | \$ 16.74    |
| 02/14/2025 | Request for Dismissal & Proposed Order; Declaration in Support of                                                      | Rapid Legal             | \$ 11.33    |
| 02/14/2025 | Further Joint Case Management Statement 2.21.25                                                                        | Rapid Legal             | \$ 16.74    |
| 02/20/2025 | Rejected Request for Dismissal & Proposed Order; Declaration In Support of                                             | Rapid Legal             | \$ 11.33    |
| 03/04/2025 | Request for Dismissal & Proposed Order; Declaration in Support of                                                      | Rapid Legal             | \$ 16.74    |
| 03/19/2025 | Rejected Motion for Preliminary Approval & Proposed Order                                                              | Rapid Legal             | \$ 11.33    |
| 03/21/2025 | Supplemental Declaration In Support of Preliminary Approval                                                            | Rapid Legal             | \$ 16.74    |
| 03/21/2025 | Amended Proof of Service Re Motion for Preliminary Approval                                                            | Rapid Legal             | \$ 16.74    |
|            | Final Approval Motion & Proposed Order; Declaration in Support*                                                        |                         | \$ 80.00    |
|            | Declaration of Class Admin Re Disbursement of Funds*                                                                   |                         | \$16.74     |

Total \$ 9,697.03