

ARaul Perez (SBN 174687)
Raul.Perez@capstonelawyers.com
Robert Drexler (SBN 119119)
Robert.Drexler@CapstoneLawyers.com
Jonathan Lee (SBN 267146)
Jonathan.Lee@CapstoneLawyers.com
Robert Myong (SBN 262097)
Robert.Myong@CapstoneLawyers.com
CAPSTONE LAW APC
1875 Century Park East, Suite 1860
Los Angeles, California 90067
Telephone: (310) 556-4811
Facsimile: (310) 943-0396

Attorneys for Plaintiff Ricardo Arciniega Gonzalez

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

RICARDO ARCINIEGA GONZALEZ,
individually, and on behalf of other members of
the general public similarly situated, and as an
aggrieved employee pursuant to the Private
Attorneys General Act ("PAGA"),

Plaintiff,

vs.

SHULTZ STEEL COMPANY, a California
corporation; and DOES 1 through 10, inclusive,

Defendants.

Lead Case No. 23STCV09167
Related Case No. 23STCV18306

Assigned to the Hon. Theresa M. Traber

**DECLARATION OF DAVID SPIVAK IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PAGA APPROVAL**

Date: April 13, 2026
Time: 10:00 a.m.
Place: Department 1

Complaint Filed: April 25, 2023
Trial Date: None Set

DECLARATION OF DAVID SPIVAK

I, DAVID SPIVAK and state as follows:

1. I am an attorney duly licensed to practice law in the State of California and am an attorney of record for Plaintiff Steven Faustinos (“Plaintiff Faustinos”) in his claims against Defendant Shultz Steel Company (“Defendant”) in the related action *Faustinos v. Shultz Steel Company*, No. 23STCV18306 (Los Angeles County Superior Court). Collectively, the “Plaintiffs” are Ricardo Arciniega Gonzalez and Steven Faustinos. Plaintiffs and Defendants are collectively referred to as the “Parties.”

2. Except as otherwise indicated, I have personal knowledge of all matters set forth herein and, if called as a witness, could and would competently testify thereto under oath.

Adequacy

3. In 1991, I earned a Bachelor of the Arts degree with a major in Political Science from the University of California at Berkeley. In 1995, I earned a Juris Doctor degree from Southwestern University School of Law.

4. In December of 1995, Supreme Court for the State of California admitted me as an Attorney and Counselor at Law and licensed me to practice law in all the Courts of this State. On May 11, 2012, I also became admitted to the District of Columbia Bar. On February 21, 2013, I became admitted to the New York bar.

5. I am experienced in handling employment law matters and specifically wage and hour cases. I have been practicing law since 1995. My experience has been almost exclusively in the area of employment law representing employees with claims of wrongful termination, harassment, whistleblower retaliation, discrimination, wage and hour, and family and medical leave violations. I have tried many cases before California and federal courts, government agencies and neutral arbitrators. I am a member of the California Employment Lawyers Association (CELA).

6. Since I started practicing law, I have tried many cases before courts, arbitrators and government agencies. Some of my cases are:

A. *Ricardo Sandoval v. Dept. of Treasury*, United States District Court, Southern District of California (the Honorable Judith Keep presiding), 1998. Plaintiffs Special Agent for the U. S. Customs Service alleged discrimination and retaliation in promotions and

1 discipline. The jury awarded compensatory damages. Court subsequently awarded additional back
2 pay and gave Plaintiffs a retroactive promotion. *See* "Lawsuit Puts Customs Service on Trial:
3 Agent Alleges Corruption, White Supremacist Cabal" by Valerie Alvord, *San Diego Union-*
4 *Tribune*, April 29, 1998; "Customs Agent Is Awarded \$200,000: Jury Says He Faced Bias And
5 Retaliation" by Valerie Alvord, *San Diego Union-Tribune*, May 16, 1998.

6 B. *Jorge Guzman v. Department of Justice*, United States District Court,
7 Central District of California (the Honorable Lourdes Baird presiding), 1999. Plaintiffs Special
8 Agent for the Immigration and Naturalization Service alleged racial discrimination, retaliation and
9 police brutality by agents of the Office of the Inspector General. Jury found the Defendants liable.
10 Case settled shortly before the damages phase. *See* "U.S. to Pay \$400,000 to INS Agent in Bias
11 Suit; Courts: Complaint says he suffered 10 years of harassment on the job because he is Latino,
12 including falsified charges" by Patrick J. McDonnell, *Los Angeles Times*, January 21, 1999.

13 C. *Dr. Perry Crouch v. SHIELDS*, Los Angeles Superior Court, Compton (the
14 Honorable Michael Rutberg presiding), 2001. Plaintiff whistleblower brought civil rights claims
15 and wrongful termination claims against employer in a month-long jury trial. The jury awarded
16 compensatory and punitive damages. *See* "Activist Says Criticism of Rail Plan Cost His Job" by
17 Dan Weikel, *Los Angeles Times*, September 28, 2000; "Punitive Damages Awarded to Fired Social
18 Worker" by Dan Weikel, *Los Angeles Times*, June 10, 2000; "A Whistleblower's Revenge" by
19 Susan Goldsmith, *New Times Los Angeles*, June 8, 2000.

20 D. *Imagraph, Inc. (Steve Shiffman) v. Mohamed T. Nehmeh*, Orange County
21 Superior Court, Central Justice Center (the Honorable Kirk H. Nakamura presiding), 2004.
22 Plaintiffs, who I represented *pro bono* sought the return of \$45,000.00 he paid to an attorney
23 escrow officer who subsequently absconded with the money. The jury awarded compensatory
24 damages. The Judgment with interest is now far in excess of that amount. Soon after this case was
25 litigated, the State Bar of California awarded me the Wiley W. Manuel Award for Pro Bono Legal
26 Services.

27 E. *Rick Pierce v. Department of Treasury*, Merit Systems Protection Board
28 (1999). Administrative Judge awarded compensatory damages to wrongfully terminated Customs
29 Agent, followed by an award of Attorneys' fees and costs.

1 F. *Richard Wamel v. Ocelot Engineering Co.*, Judicate West before the
2 Honorable Robert Polis (ret.) (2008). In that case, I represented a victim of FMLA violations and
3 wrongful termination against his former employer. The Neutral Arbitrator awarded compensatory
4 and liquidated damages. The claims for damages, attorney's fees and costs were resolved shortly
5 thereafter by means of a confidential settlement.

6 G. *Alina Ghrdilyan v. RJ Financial, Inc.*, et al., LA Superior Court case no.
7 BC430633 (2012), the Honorable Ronald Sohigian presiding. To my knowledge, this case is the
8 first and only case to be successfully prosecuted through trial under the Labor Code Private
9 Attorney Generals Act of 2004, Labor Code §§ 2698, *et seq.* on behalf of Plaintiffs and other
10 aggrieved employees against someone other than an employer for civil penalties including unpaid
11 wages. The case involves claims of unpaid overtime, unprovided rest and meal periods, unpaid
12 vacation, untimely interval and final wages, and unreimbursed expenses. For my work in that case,
13 the Court awarded me an hourly rate of \$600.00 hour based on my skill and experience.

14 7. Since 2007, I have prosecuted several traditional wage & hour class and PAGA
15 actions as the sole or primary attorney for the Plaintiffs, including *Pudelwitts v. Regent Parking,*
16 *Inc.*, *Singery v. Quality Vessel Engineering*, *Tesillo v. LA Executive Towing Service, Inc.*, and
17 *Madison v. The Limousine Connection*. One such case is *Jose Tapia v. Mangen Group, Inc.*, LASC
18 case no. BC377114, a garden-variety wage & hour class action with many of the same claims at
19 issue in this case. The Honorable Jane Johnson of the Los Angeles Superior Court, presiding over
20 the motion for final approval of the settlement class action settlement in *Tapia v. Mangen*, had no
21 quarrel with an hourly rate of \$525.00 for my services.

22 8. In my representation of employees, I have prosecuted several lawsuits on behalf of
23 employees with claims of Labor Code violations or other wage claims.

24 9. I have been involved in the prosecution of numerous wage and hour class and
25 PAGA actions at various stages of litigation. A small sampling of the wage and hour class and
26 PAGA action cases in which I have been counsel of record is as follows:

27 A. *Alafa v. Custom Built Personal Training, Inc.*, Tulare County Superior
28 Court, Case No. VCU-245496 (appointed Class Counsel and granted final approval class action
29 settlement on behalf of assistant fitness manager employees).

1 B. *Cuellar v. Lovin Oven*, Orange County Superior Court, Case No. 30-2010-
2 000382146 (appointed Class Counsel and granted final approval of class action settlement by the
3 court on behalf of nonexempt employees).

4 C. *Cunningham v. DPI Specialty Foods West, Inc.*, Los Angeles Sup.Ct., Case
5 No. BC465017 (appointed Class Counsel and granted final approval of class action settlement on
6 behalf of merchandiser employees).

7 D. *Deckard v. MSL Community Management LLC*, Riverside County Superior
8 Court, Case No. RIC1204182 (appointed Class Counsel and granted final approval of class action
9 settlement on behalf of caregivers and medical technicians).

10 E. *DiCato v. Francesca's Collections, Inc.*, San Diego County Superior Court,
11 Case No. 37-2012-00094401-CU-OE-CTL (appointed Class Counsel and granted final approval
12 of class action settlement on behalf of boutique manager and assistant manager employees).

13 F. *Evans v. Equinox, et al.*, Los Angeles Sup.Ct., Case No. BC440058
14 (appointed Class Counsel and granted final approval of class action settlement on behalf of
15 personal trainer employees).

16 G. *Fischer v. National Distribution Centers*, Riverside County Superior Court,
17 Case No. RIC1114952 (appointed Class Counsel and granted final approval of class action
18 settlement on behalf of hourly warehouse employees).

19 H. *Hidalgo, et al. v. Sun Hill*, Los Angeles Superior Court, Case No.
20 BC480808 (appointed Class Counsel and granted final approval of class action settlement on
21 behalf of hourly employees).

22 I. *Huynh v. Carefusion Resources, LLC, et al*, San Diego Sup.Ct., Case No.
23 37-2009-00103277-CU-OE-CTL (appointed Class Counsel and granted final approval of class
24 action settlement on behalf of medical devices employees).

25 J. *Linder, et al. v. Warehouse Services, Inc.*, San Bernardino Superior Court,
26 Case No. CIVDS1500146 (appointed Class Counsel and granted final approval of class action
27 settlement on behalf of non-exempt hourly employees excluding truck drivers).

28 K. *La Fleur v. Medical Management International, Inc.*, United States District
29 Court, Central District of California, Case No. EDCV13-00398-VAP (appointed Class Counsel
30

1 and granted final approval of class action settlement on behalf of practice managers).

2 L. *Lynch, et al. v. American Guard Services*, Los Angeles Superior Court,
3 Case No. BC462681 (appointed Class Counsel and granted final approval of class action
4 settlement on behalf of security guard employees).

5 M. *Martin, et al. v. Aukeman Dairy, et al.*, Kern Superior Court, Case No. S-
6 1500-CV-282679 (appointed Class Counsel and granted final approval of class action settlement
7 on behalf of dairy and agricultural laborers).

8 N. *Montes v. Branam Enterprises, Inc.*, Los Angeles Sup.Ct. Case No.
9 BC442608 (appointed Class Counsel and granted final approval of class action settlement on
10 behalf of call concert rigging employees).

11 O. *Nardone v. Sequoia Beverage Company, LP*, Tulare County Superior Court,
12 Case No. VCU-248370 (appointed Class Counsel and granted final approval of class action
13 settlement by the court on behalf of hourly employees).

14 P. *Ogbuehi v. Comcast of California/Colorado/Florida/Oregon, Inc.*, United
15 States District Court, Eastern District of California, Case No. EDCV13-00672-KJM-KJN
16 (appointed Class Counsel and granted final approval of class action settlement on behalf of virtual
17 customer account executives).

18 Q. *Rosen v. Image Transfer*, Los Angeles Superior Court, Case No.
19 BC511072 (appointed Class Counsel and granted final approval of class action settlement on
20 behalf of bobtail truck drivers).

21 R. *Sandoval v. Rite Aid Corp.*, Los Angeles Superior Court, Case No.
22 BC431249 (granted class certification through contested motion and appointed Class Counsel in
23 case on behalf of former pharmacy employees based on late final wage payments in violation of
24 Labor Code §§ 201–203).

25 S. *Celeste Shaw and Dejan Nagl v. Interthinx, Inc.*, United States District
26 Court for the District of Colorado, Case No. 13-CV-01229-REB-BNB (appointed Class Counsel
27 and granted final approval of class action settlement by the court on behalf of auditor employees).

28 T. *Stucker v. L'Oreal*, Los Angeles Sup.Ct. Case No. BC456080 (appointed
29 Class Counsel and granted final approval of class action settlement involving alleged
30

1 misclassification of sales employees and unpaid vacation pay).

2 U. *Valdez v. Healthcare Services Group, Inc.*, Los Angeles Sup.Ct., Case No.
3 BC462917 (appointed Class Counsel and granted final approval of class action settlement on
4 behalf of service account manager employees).

5 V. *Valencia v. SCIS Air Security Corp.*, Los Angeles Superior Court, Case No.
6 BC421485 (granted class certification through contested motion and appointed Class Counsel in
7 case on behalf of former security workers based on late final wage payments in violation of Labor
8 Code §§ 201–203).

9 W. *Vang v. Burlington Coat Factory Corporation*, United States District Court
10 Central District of California, Case No. 09-CV-08061-CAS-JCx (appointed Class Counsel and
11 granted final approval of class action settlement by the court on behalf of assistant store manager
12 employees).

13 X. *Volney-Parris v. Southern California Edison Company*, Los Angeles
14 Superior Court, Case No. BC493038 (appointed Class Counsel and granted final approval of class
15 action settlement on behalf of customer specialist employees).

16 Y. *Wade and Gammel, et al. v. Defender Security Company*, Central District
17 of California, Case No. 2:15-cv-7142 CAS-JC (appointed Class Counsel and granted final
18 approval class action settlement on behalf of security technicians).

19 Z. *White v. 20/20 Communications, Inc.*, San Bernardino County Superior
20 Court, Case No. CIVRS1301718 (appointed Class Counsel and granted final approval of class
21 action settlement on behalf of sales associates).

22 10. The Los Angeles Superior Court approved an hourly rate of \$650.00 for me, as
23 reasonable attorneys' fees in *Tucker v. Maly's West, Inc.*, Los Angeles County Superior Court,
24 Case No. BC483920 over three years ago.

25 11. Based on my knowledge, Plaintiffs' Counsel are being paid entirely on contingency
26 and have not been paid any Plaintiffs' Counsel Fees Payment since assuming representation of
27 Plaintiffs. The work performed by Plaintiffs' Counsel for the Plaintiffs was extensive. Among
28 other things, Plaintiffs' Counsel:

- 29 • Conducted initial investigations and developed the theories and facts to support
30

1 Plaintiffs' claims as to Defendants' alleged violations;

- 2 • Researched and drafted Plaintiffs' complaints and amended complaints;
- 3 • Sought and obtained informal discovery, including, but not limited to, the discovery
- 4 such as the production of Defendants' relevant written company policies;
- 5 • Reviewed and analyzed over hundreds of pages of written policy documents, time
- 6 records, and payroll records produced by Defendants;
- 7 • Prepared detailed liability exposure calculations and settlement discussions that led
- 8 to the Settlement;
- 9 • Engaged in difficult and protracted settlement negotiations with Defendants;
- 10 • Drafted settlement agreements, motions and proposed orders for PAGA approval,
- 11 form notices, and claims administration guidelines; and
- 12 • My firm incurred over \$7,099.26 in litigation expenses to date and estimates to
- 13 incur additional litigation expenses through final accounting of the Settlement for a total of
- 14 approximately \$7,304.50.

15 12. Despite the many risks faced by Plaintiffs' Counsel, and the difficulty in
16 prosecuting this case, Plaintiffs' Counsel nevertheless achieved an outstanding result for the
17 Aggrieved Employees. Accordingly, Plaintiffs' Counsel's request for Plaintiffs' Counsel Fees
18 Payment of one-third of the GSA is fair and reasonable. In fact, this amount is well-earned,
19 supported by controlling case law, and is within the fee range awarded by courts. There is no
20 evidence to date that Plaintiffs' Counsel's request for Plaintiffs' Counsel Fees Payment has
21 anything but the unanimous support of the Aggrieved Employees.

22 13. My co-counsel and I have expended time, effort, and money that I could have
23 expended on less risky cases against defendants with greater financial viability. My co-counsel
24 and I took on this representation well aware of the risks involved and with the full intention of
25 seeing it to the end, including through any appeals (and could still, in theory, have to litigate
26 appellate issues pending the outcome of this motion and the expiration of the appeals period). In
27 the face of the risks involved and the contrary authorities discussed above, we performed
28 tremendous amount of work and vigorously litigated this Action.

29 14. My previous experience in litigating wage and hour class and PAGA actions also
30

1 supports the reasonableness of the fee request, as does the caliber of opposing counsel. My
2 previous experience in similar matters was integral in evaluating the strengths and weaknesses of
3 the case against Defendants and the reasonableness of the Settlement. Practice in the narrow field
4 of wage and hour litigation requires skill and knowledge concerning the rapidly evolving
5 substantive law, state and federal, as well as the procedural law of class action and PAGA
6 litigation. Because it is reasonable to compensate me commensurate with my skill, reputation, and
7 experience, Plaintiffs' Counsel Fees Payment of one-third of the GSA is reasonable. Likewise, the
8 caliber and experience of opposing counsel in labor and employment litigation, Bryan Cave
9 Leighton Paisner LLP, supports the fairness and reasonableness of the requested Plaintiffs'
10 Counsel Fees Payment.

11 15. Plaintiffs' Counsel's request for attorneys' fees is reasonable as a percentage of the
12 Settlement and those efforts that occasioned payment of individual settlements to employees of
13 Defendants in advance of this PAGA Settlement. In this case, the request for attorneys' fees of
14 \$93,333.00 constitutes one-third of the \$280,000. Plaintiffs and the Aggrieved Employees, as the
15 prevailing party plaintiffs in settlement, are entitled to recover attorneys' fees and costs for their
16 wage claims, and the associated interest and penalties. See Lab. Code §§ 218.5, 2699(g); Code
17 Civ. Proc. § 1021.5(a); *Earley v. Superior Court* (2000) 79 Cal.App.4th 1420. An attorneys' fees
18 award is justified where the legal action has produced its benefits by way of a voluntary settlement.
19 See, e.g., *Maria P. v. Riles* (1987) 43 Cal.3d 1281, 1290-1291; *Westside Cmty. for Indep. Living,*
20 *Inc. v. Obledo* (1983) 33 Cal.3d 348, 352-353. California law provides that when a party is entitled
21 to statutory fees, the party must be compensated for all time reasonably spent seeking to
22 accomplish the desired result. *Serrano v. Unruh* (1982) 32 Cal.3d 621, 624.

23 16. My firm has prosecuted this litigation solely on a contingent-fee basis, and has been
24 completely at risk that it would not receive any compensation for prosecuting claims against the
25 Defendants.

26 17. My firm's current litigation expenses total approximately \$7,099.26. True and
27 correct copies of the costs and expense records of my firm are collectively attached as **Exhibit A**
28 to this declaration with minor redactions to protect the confidentiality of sensitive, privileged
29 information. I will make unredacted copies of such records available to the Court for *in camera*
30

inspection upon its request. I anticipate that I will incur an additional \$205.24 in costs for filing request for dismissal in the related lawsuit pending in State Court, filing a Joint Status Report and the electronic service provider fees. I anticipate my firm's litigations costs will total approximately \$7,304.50 through final accounting of the Settlement.

18. Plaintiffs' Counsel's request for attorneys' fees will also be justified under the lodestar method. I spent over 24.47 hours litigating this case. I also expect to perform additional work on this case if the Court grants PAGA approval of the Settlement, including supervision of the Administrator's disbursement of the settlement funds to the Aggrieved Employees.

19. Plaintiffs' Counsel's requested attorneys' fees will also be justified under the lodestar method. In this case, Plaintiff Faustinos' Counsel has a total lodestar of approximately \$54,983.50 without the use of any multiplier, which results in a multiplier of 1.70 when compared against the \$93,333.00 request for attorneys' fees. A general summary showing of the pre-multiplier lodestar by Plaintiff Faustinos' Counsel and the number of hours of work performed by each attorney and paralegal of my firm are set forth below with a total lodestar of approximately \$54,983.50 for my firm. Based on the experience and credentials of Plaintiffs' Counsel, these rates are well within the range charged by attorneys with comparable experience and qualifications and thus are reasonable:

Firm	Total Hours	Pre-Multiplier Lodestar
The Spivak Law Firm	192.07	\$54,983.50

True and correct copies of the time records of my firm are collectively attached as **Exhibit B** to this declaration with minor redactions to protect the confidentiality of sensitive, privileged information. I will make unredacted copies of such records available to the Court for *in camera* inspection upon its request.

20. I believe that the Settlement is fair, adequate, and reasonable. The Settlement provides substantial monetary benefits to Aggrieved Employees and is a product of diligent efforts of Plaintiffs' Counsel to obtain the best possible result for the Aggrieved Employees.

Plaintiffs' Service Award Payments

21. Finally, the Settlement provides that Plaintiffs Ricardo Arciniega Gonzalez and Steven Faustinos ("collectively refer to as ("Plaintiffs")) may seek Service Award Payments of \$5,000.00 each.

22. Plaintiff Faustinos ("Plaintiff Faustinos") began his investigation and retention of attorneys to pursue the claims at issue on approximately May 4, 2023. Plaintiff Faustinos sent a PAGA Notice to the LWDA, with a copy to Defendant, on July 26, 2023. Plaintiff Faustinos filed his action against Defendant on August 2, 2023, asserting class claims. Plaintiff Faustinos filed his First Amended Complaint on October 23, 2023, adding a cause of action under PAGA. Defendant filed a motion to compel individual arbitration, dismiss Plaintiff Faustino's class claims, and stay the non-individual PAGA claims on May 8, 2024. On Defendant's motion, Plaintiff Faustinos's class and individual claims were compelled to arbitration, while his non-individual PAGA claims were stayed in court.

23. Awarding Plaintiff Faustinos less than two percent (1.79%) of the GSA is entirely reasonable given Plaintiff Faustinos' efforts in this case undertaken on behalf of the Aggrieved Employees. In this case, Plaintiff Faustinos has devoted several hours of his time advancing the interests of the Aggrieved Employees and also expects to devote additional hours of his time with Plaintiffs' Counsel overseeing the administration of the Settlement if the Court grants approval of the Settlement. *See generally* Declaration of Steven Faustinos. He has done this by, among other things, retaining experienced counsel, providing them with extensive information about his work history with Defendants and Defendants' policies and practices with respect to the wage and hour claims at issue, assisting them in contacting Aggrieved Employees to gather information, participating in a full day of mediation, having his deposition taken, delaying pursuit of his individual claims in favor of a fair class-wide resolution, and being actively involved in the settlement process to ensure a fair result for the Aggrieved Employees as a whole.

24. As a named Plaintiff, Plaintiff Faustinos agreed to (1) consider the interests of the Aggrieved Employees just as he would consider his own interests and, in some cases, to put the interests of the Aggrieved Employees before his own interests; (2) actively participate in the lawsuit, as necessary, by among other things, answering interrogatories, producing documents to

Defendants and giving deposition and trial testimony if requested; (3) recognize and accept that any resolution of the lawsuit by dismissal or settlement, is subject to court approval, and must be designed in the best interest of the Aggrieved Employees (4) follow the progress of the lawsuit and provide all relevant facts to Plaintiffs' Counsel; (5) champion many other people with similar claims and injuries because of the importance of the case and that necessity that all Aggrieved Employees benefit from the lawsuit; and (6) fight for a resolution in which the individual recovery to each Aggrieved Employee, including Plaintiff Faustinos, may be relatively small. Plaintiff Faustinos agreed to shoulder all of these responsibilities in exchange for a proportionate share of funds made available for distribution to the Aggrieved Employees. *See generally* Declaration of Steven Faustinos. Plaintiff Faustinos had no guarantee of a Service Award Payment. This justifies the Service Award Payment sought.

25. In taking the actions outlined above, Plaintiff Faustinos had exposed himself to significant risks, including the risk that he could have been ordered to pay Defendant's Counsel Fees Payment and costs if this Action had been unsuccessful (*see* Lab. Code §§ 218.5-218.6), as well as the risk that he could, in the future, face a potentially hostile work environment and worsened career prospects for suing a prior employer for wage and hour violations and serving as a Plaintiff in a PAGA lawsuit. Additionally, Plaintiff Faustinos had exposed himself to the risk that he could end up receiving less than Defendant would have paid him at the beginning of the Action via a C.C.P. § 998 offer or other individual settlement offer to drop his allegations. On many occasions, California courts have ordered wage and hour plaintiff and would be representatives to pay outrageous fee and/or cost awards for unsuccessful claims.

26. Such costs awards are higher than the share of the Net Settlement Amount ("NSA") that Plaintiffs stand to receive as an Aggrieved Employee. It is unfair in view of the substantial risk of an adverse fee or cost award of several thousand dollars that plaintiffs receive less as a reward for taking such a risk. Moreover, we cannot lose sight of the fact that Plaintiffs are not high wage earners. Even the lowest of the cost awards listed above would have devastating consequences for Plaintiffs in view of their modest earnings.

27. The average Aggrieved Employee in this case would be unlikely to pursue individually the claims Plaintiffs brought against Defendants because such claims would be too

1 who is willing to pursue an individual's claims because the claims are too small to justify the
2 hundreds of hours of legal work necessary to prove each claim. Only the PAGA actions, which
3 allows for the aggregation of hundreds of risky small dollar value claims when employees have
4 executed arbitration agreements, makes such claims advantageous for an attorney to pursue on a
5 contingency basis and there can be no PAGA action without an aggrieved employee assuming the
6 great fiduciary responsibilities of a private attorney general. This court should allow the Service
7 Award Payment requested because to do otherwise would discourage employees (and attorneys)
8 from bringing PAGA actions in the first place.

9 28. If would-be private attorneys general are not adequately incentivized to advance
10 the public policy behind PAGA actions in court in light of the time and risk it will entail, it is
11 unlikely that they will bring PAGA lawsuits in the first place. Once employers realize that such
12 lawsuits are unlikely, they will have no incentive to comply with wage and hour laws.

13 29. Plaintiffs faced the risk that they could face worsened career prospects for suing a
14 former employer for wage and hour violations and serving as the Plaintiffs in a PAGA lawsuit.
15 Because they filed lawsuits in the California Superior Court, a public record now exists that
16 Plaintiffs sued their employer for Labor Code violations – a fact that won't be lost on prospective
17 employers considering him for a job. Common sense dictates that an employer will think twice
18 about hiring someone who sued their last employer. Legal experts have recognized this fact.
19 California even has laws to address this risk: Labor Code § 1102.5 prohibits retaliation against
20 employees who speak up about Labor Code violations and Labor Code § 98.6 prohibits
21 discrimination against employees who bring Labor Code violations to the attention of the Labor
22 Commissioner. Thus, the risk to Plaintiffs' future employment shows that the Service Award
23 Payment sought are fair, adequate, and reasonable, and warrants final approval of the Court.

24
25 ///

26
27 ///

28
29 ///

1 30. By agreeing to settle the case in the best interest of the Aggrieved Employees,
2 Plaintiffs have given up the right to pursue individual claims and recover substantially more in
3 unpaid wages, interest, waiting time penalties, pay stub penalties, and civil penalties that they will
4 release as part of the Settlement. Plaintiff Faustinos did not seek individual settlement for his
5 claims at all, instead choosing to prosecute the claims on behalf of the Aggrieved Employees.

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

8 Executed on February 17, 2026, at New York, New York

9 

10 DAVID G. SPIVAK,

EXHIBIT A

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
2/6/23	David Spivak (28+ Year Attorney)	set up file for FV; email client	0.33	\$900.00	\$297.00
3/2/23	Breck Oyama (15+ Year Paralegal)	add SOL deadline chain and FV ph#	0.08	\$300.00	\$24.00
3/6/23	Stacy Aguirre (Formerly Employed 4+ year Paralegal)	Worked on tasks, called cl re confirming termination date, set up cl folder	0.33	\$200.00	\$66.00
3/6/23	Daniela Linares (2nd Year Intake Assistant)	tc w sa	0.08	\$150.00	\$12.00
3/17/23	Daniela Linares (2nd Year Intake Assistant)	email to dgs	0.08	\$150.00	\$12.00
3/22/23	Nora Greer (15+ Year Paralegal)	Review fv, email to dgs	0.08	\$200.00	\$16.00
3/22/23	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
3/23/23	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	review emails/case/intake	0.50	\$250.00	\$125.00
3/31/23	Nora Greer (15+ Year Paralegal)	F/U email to team	0.08	\$200.00	\$16.00
4/6/23	Breck Oyama (15+ Year Paralegal)	review emails	0.08	\$300.00	\$24.00
4/14/23	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	review emails/case progress/client doc	0.50	\$250.00	\$125.00
5/2/23	Daniela Linares (2nd Year Intake Assistant)	saved and entered fully executed retainer	0.08	\$150.00	\$12.00
5/2/23	Nora Greer (15+ Year Paralegal)	Review emails/tasks	0.25	\$200.00	\$50.00
5/2/23	Daniela Linares (2nd Year Intake Assistant)	saved client sig retainer, sent to dgs	0.17	\$150.00	\$25.50
5/2/23	Daniela Linares (2nd Year Intake Assistant)	retainer to client	0.17	\$150.00	\$25.50
5/4/23	Daniela Linares (2nd Year Intake Assistant)	call to client, email rev	0.17	\$150.00	\$25.50
5/4/23	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	LWDA lts/case review/fv review	2.00	\$250.00	\$500.00
5/4/23	Nora Greer (15+ Year Paralegal)	DLSE CPRA Request, Search LWDA, LWDA CPRA Request, Team Emails, Review FV	0.50	\$200.00	\$100.00
5/4/23	Nora Greer (15+ Year Paralegal)	Send Client Social Media Email	0.08	\$200.00	\$16.00
5/5/23	Nora Greer (15+ Year Paralegal)	Review emails, circulate/save LWDA CPRA responses	0.25	\$200.00	\$50.00
5/8/23	Nora Greer (15+ Year Paralegal)	Review emails	0.08	\$200.00	\$16.00
5/8/23	David Spivak (28+ Year Attorney)	review prior claims; emails re status of prior case; instructions to staff	0.08	\$900.00	\$72.00
5/9/23	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	LWDA lts review/case review/client docs/FV update	1.50	\$250.00	\$375.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
5/9/23	Daniela Linares (2nd Year Intake Assistant)	call and email to client	0.17	\$150.00	\$25.50
5/9/23	Nora Greer (15+ Year Paralegal)	Review emails	0.08	\$200.00	\$16.00
5/15/23	Daniela Linares (2nd Year Intake Assistant)	call w client, calendar intake.	0.08	\$150.00	\$12.00
5/17/23	Daniela Linares (2nd Year Intake Assistant)	intake tab w client	0.58	\$150.00	\$87.00
5/22/23	Nora Greer (15+ Year Paralegal)	Review emails	0.08	\$200.00	\$16.00
5/23/23	Nora Greer (15+ Year Paralegal)	Review emails, messages to DL	0.08	\$200.00	\$16.00
5/23/23	Daniela Linares (2nd Year Intake Assistant)	emails to client, tc w ng	0.25	\$150.00	\$37.50
6/2/23	Daniela Linares (2nd Year Intake Assistant)	text to CL	0.08	\$150.00	\$12.00
6/2/23	Nora Greer (15+ Year Paralegal)	Calendar SOL dates, review FV	0.17	\$200.00	\$34.00
6/5/23	Daniela Linares (2nd Year Intake Assistant)	cont intake w client, email to team	0.75	\$150.00	\$112.50
6/5/23	Daniela Linares (2nd Year Intake Assistant)	text to cl	0.08	\$150.00	\$12.00
6/5/23	Daniela Linares (2nd Year Intake Assistant)	rev text	0.08	\$150.00	\$12.00
6/6/23	Daniela Linares (2nd Year Intake Assistant)	email rev	0.08	\$150.00	\$12.00
6/8/23	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
6/9/23	Daniela Linares (2nd Year Intake Assistant)	text to client, call to client - vm full, background check on client	0.17	\$150.00	\$25.50
6/12/23	Daniela Linares (2nd Year Intake Assistant)	ev pres lt drafting and case rev	0.42	\$150.00	\$63.00
6/12/23	Nora Greer (15+ Year Paralegal)	TC with DL	0.08	\$200.00	\$16.00
6/12/23	Daniela Linares (2nd Year Intake Assistant)	tc w lc	0.08	\$150.00	\$12.00
6/12/23	Daniela Linares (2nd Year Intake Assistant)	text to cl	0.08	\$150.00	\$12.00
6/12/23	Daniela Linares (2nd Year Intake Assistant)	email rev, final draft ev pres lt	0.17	\$150.00	\$25.50
6/12/23	Daniela Linares (2nd Year Intake Assistant)	casos save docs, autho prep and sent to client	0.25	\$150.00	\$37.50
6/12/23	Daniela Linares (2nd Year Intake Assistant)	call w ng re ev pres lt	0.17	\$150.00	\$25.50
6/14/23	Daniela Linares (2nd Year Intake Assistant)	finalized ev pres lt, sent to dgs for sig	0.17	\$150.00	\$25.50
6/14/23	Daniela Linares (2nd Year Intake Assistant)	saved and sent ev pres lt	0.17	\$150.00	\$25.50
6/15/23	Daniela Linares (2nd Year Intake Assistant)	text and email to client	0.08	\$150.00	\$12.00
6/16/23	Daniela Linares (2nd Year Intake Assistant)	saved and entered expense	0.08	\$150.00	\$12.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
6/16/23	Daniela Linares (2nd Year Intake Assistant)	online search	0.17	\$150.00	\$25.50
6/20/23	Daniela Linares (2nd Year Intake Assistant)	EE search, intake rev, email rev	0.17	\$150.00	\$25.50
6/21/23	Nora Greer (15+ Year Paralegal)	Review emails/texts	0.08	\$200.00	\$16.00
6/21/23	Daniela Linares (2nd Year Intake Assistant)	call, email and text to client	0.08	\$150.00	\$12.00
7/7/23	Daniela Linares (2nd Year Intake Assistant)	call to emergency contact	0.08	\$150.00	\$12.00
7/7/23	Daniela Linares (2nd Year Intake Assistant)	text to client, fv rev	0.17	\$150.00	\$25.50
7/10/23	Daniela Linares (2nd Year Intake Assistant)	tc w mc	0.08	\$150.00	\$12.00
7/10/23	Nora Greer (15+ Year Paralegal)	Review emails	0.08	\$200.00	\$16.00
7/11/23	Daniela Linares (2nd Year Intake Assistant)	call to client, call to emergency contact, email to client	0.08	\$150.00	\$12.00
7/11/23	Daniela Linares (2nd Year Intake Assistant)	text to client	0.08	\$150.00	\$12.00
7/11/23	Nora Greer (15+ Year Paralegal)	Review texts	0.08	\$200.00	\$16.00
7/11/23	Daniela Linares (2nd Year Intake Assistant)	tc w ng, email to client	0.08	\$150.00	\$12.00
7/12/23	Daniela Linares (2nd Year Intake Assistant)	email	0.08	\$150.00	\$12.00
7/12/23	Daniela Linares (2nd Year Intake Assistant)	email	0.08	\$150.00	\$12.00
7/12/23	Daniela Linares (2nd Year Intake Assistant)	pf saved and ocr, circulated, review pf for dgs.	0.50	\$150.00	\$75.00
7/12/23	Daniela Linares (2nd Year Intake Assistant)	email and text to client	0.08	\$150.00	\$12.00
7/12/23	Daniela Linares (2nd Year Intake Assistant)	email	0.08	\$150.00	\$12.00
7/12/23	Nora Greer (15+ Year Paralegal)	Review emails, review texts	0.17	\$200.00	\$34.00
7/12/23	Daniela Linares (2nd Year Intake Assistant)	text to client, calendar entry	0.08	\$150.00	\$12.00
7/13/23	Daniela Linares (2nd Year Intake Assistant)	text to cl	0.08	\$150.00	\$12.00
7/13/23	Daniela Linares (2nd Year Intake Assistant)	call w client, email to client	0.17	\$150.00	\$25.50
7/14/23	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	prep for pleadings/intake tab review/notes/msg team	2.75	\$250.00	\$687.50
7/17/23	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	fill intake/lwda tab	1.00	\$250.00	\$250.00
7/17/23	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	draft lwda letter/WO research/case review/email team	4.00	\$250.00	\$1,000.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
7/17/23	Daniela Linares (2nd Year Intake Assistant)	draft adp ev pres lt	0.17	\$150.00	\$25.50
7/18/23	Daniela Linares (2nd Year Intake Assistant)	lwda email rev	0.08	\$150.00	\$12.00
7/18/23	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	draft class complaint/fill tabs	2.25	\$250.00	\$562.50
7/19/23	Nora Greer (15+ Year Paralegal)	Review emails	0.17	\$200.00	\$34.00
7/19/23	Daniela Linares (2nd Year Intake Assistant)	save client docs, email rev, call w client, email to team	0.33	\$150.00	\$49.50
7/19/23	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	revise LWDA letter & class complaint/email msg team	1.58	\$250.00	\$395.00
7/19/23	Daniela Linares (2nd Year Intake Assistant)	text to client	0.08	\$150.00	\$12.00
7/19/23	Daniela Linares (2nd Year Intake Assistant)	Text to client, email rev	0.17	\$150.00	\$25.50
7/20/23	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	Revise class complaint/dgs emails	0.67	\$250.00	\$167.50
7/20/23	David Spivak (28+ Year Attorney)	Review and revise letter to the Labor & Workforce Development Agency and Class Action complaint	0.67	\$900.00	\$603.00
7/21/23	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	finalize pleadings/email team	2.00	\$250.00	\$500.00
7/26/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	LWDA letter submission, save to file, generate letter stream, circulate w team, met w NG	0.92	\$150.00	\$138.00
7/26/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	proof LWDA letter, send for sig, parse PDFs, save in file	0.25	\$150.00	\$37.50
7/26/23	Daniela Linares (2nd Year Intake Assistant)	msg w ng re task	0.08	\$150.00	\$12.00
7/27/23	Daniela Linares (2nd Year Intake Assistant)	drafting cell ev pres lt	0.25	\$150.00	\$37.50
7/27/23	Nora Greer (15+ Year Paralegal)	Review emails	0.08	\$200.00	\$16.00
7/27/23	Daniela Linares (2nd Year Intake Assistant)	email rev	0.08	\$150.00	\$12.00
7/27/23	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	client emails	0.17	\$250.00	\$42.50
7/28/23	Daniela Linares (2nd Year Intake Assistant)	finalized cell ev pres lt, fax and mail ev pre lts	0.50	\$150.00	\$75.00
7/28/23	David Spivak (28+ Year Attorney)	review personnel file	0.25	\$900.00	\$225.00
7/31/23	Daniela Linares (2nd Year Intake Assistant)	Saved and entered expense	0.08	\$150.00	\$12.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
8/1/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	tc, emails, doc review/pdf parse, filing	1.00	\$150.00	\$150.00
8/1/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	filing complaint and related docs, prep	0.67	\$150.00	\$100.50
8/2/23	Nora Greer (15+ Year Paralegal)	Review emails, staff chats, assist with Filing	0.33	\$200.00	\$66.00
8/2/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	review emails, staff chats, resubmit filing	0.67	\$150.00	\$100.50
8/2/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	confer w NG/BO re filing	0.17	\$150.00	\$25.50
8/2/23	Nora Greer (15+ Year Paralegal)	Confer with BO/TH re filing	0.17	\$200.00	\$34.00
8/2/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	call to court re filing	0.08	\$150.00	\$12.00
8/3/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	reviewed completed ls job, saved cert mail receipt and usps tracking, circulated w team	0.25	\$150.00	\$37.50
8/3/23	Nora Greer (15+ Year Paralegal)	Review emails	0.08	\$200.00	\$16.00
8/3/23	Breck Oyama (15+ Year Paralegal)	review filing and email TH tasks	0.25	\$300.00	\$75.00
8/3/23	Daniela Linares (2nd Year Intake Assistant)	email rev	0.08	\$150.00	\$12.00
8/3/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	review emails, staff chats, resubmit civil cover, save and ocr filed court docs, email client, update fv tab	0.92	\$150.00	\$138.00
8/11/23	Daniela Linares (2nd Year Intake Assistant)	saved and rev cell ev pres lt response, email to team	0.17	\$150.00	\$25.50
8/15/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	set track alerts lexis, save minute order/cert mailing/circulate w team, calendar dates	0.25	\$150.00	\$37.50
8/16/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	reviewed emails and updated calendar	0.08	\$150.00	\$12.00
8/16/23	Daniela Linares (2nd Year Intake Assistant)	email rev	0.08	\$150.00	\$12.00
8/16/23	Breck Oyama (15+ Year Paralegal)	review emails/calendar, update deadline chain	0.08	\$300.00	\$24.00
8/18/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	review track alert, save isc order, add guideline checklist to isc order, review and reply to emails, update calendar	0.58	\$150.00	\$87.00
8/23/23	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
8/25/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	reviewed OL emails re sop, circ'd to team	0.08	\$150.00	\$12.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
8/25/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	reviewed file, saved conformed isc order, parsed and reviewed service pdf, submitted sop order on agent	0.67	\$150.00	\$100.50
8/28/23	Daniela Linares (2nd Year Intake Assistant)	email rev	0.08	\$150.00	\$12.00
8/28/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	email sop status update to team	0.08	\$150.00	\$12.00
8/31/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	review team email, circ notice to client	0.08	\$150.00	\$12.00
8/31/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	review email, save and circ filed pos summons	0.08	\$150.00	\$12.00
8/31/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	filed pos summons, entered expense, circ'd to team	0.17	\$150.00	\$25.50
8/31/23	Breck Oyama (15+ Year Paralegal)	review emails, update deadline chains	0.25	\$300.00	\$75.00
8/31/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	reviewed emails, saved and circ'd pos summons	0.08	\$150.00	\$12.00
9/6/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	reviewed emails, retrieved/saved/circulated files from docket, reviewed oc website for contacts, updated fv, uodated pos	0.33	\$150.00	\$49.50
9/13/23	Daniela Linares (2nd Year Intake Assistant)	fv task rev, casos task	0.17	\$150.00	\$25.50
9/22/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	review emails, save/circulate SOP receipt	0.17	\$150.00	\$25.50
9/29/23	Breck Oyama (15+ Year Paralegal)	review deadlines, email team re adding PAGA	0.17	\$300.00	\$51.00
10/6/23	Breck Oyama (15+ Year Paralegal)	check w/ team re deadline	0.08	\$300.00	\$24.00
10/10/23	Breck Oyama (15+ Year Paralegal)	check w/ team re JSR	0.08	\$300.00	\$24.00
10/12/23	Nora Greer (15+ Year Paralegal)	Message team re JSR	0.08	\$200.00	\$16.00
10/13/23	Nora Greer (15+ Year Paralegal)	Attempt to schedule appearance via courtconnect	0.08	\$200.00	\$16.00
10/13/23	Nora Greer (15+ Year Paralegal)	Staff chats, review emails, save JSR to file, email OC re JSR and M/C, update calendar	0.25	\$200.00	\$50.00
10/16/23	David Spivak (28+ Year Attorney)	Review and revise JSR	0.17	\$900.00	\$153.00
10/16/23	Daniela Linares (2nd Year Intake Assistant)	email rev	0.08	\$150.00	\$12.00
10/16/23	Nora Greer (15+ Year Paralegal)	Review email/update calendar re M/C call/staff chat	0.17	\$200.00	\$34.00
10/16/23	Thalia Higgins (Formerly Employed 1st Year Paralegal)	review emails, review and email MO to CL, update calendar, review docket for lead case	0.25	\$150.00	\$37.50

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
10/17/23	Daniela Linares (2nd Year Intake Assistant)	email	0.08	\$150.00	\$12.00
10/18/23	Nora Greer (15+ Year Paralegal)	Review emails	0.08	\$200.00	\$16.00
10/18/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Confirm Minute Order sent to client and case file updated with new Judge information.	0.33	\$200.00	\$66.00
10/18/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Update calendar with CMC Statement deadline.	0.17	\$200.00	\$34.00
10/18/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Review Initial Order dated 08.15.23 re e-service. Call court to advise of parties agreement but Dept is dark; sent status email to team.	0.92	\$200.00	\$184.00
10/18/23	Daniela Linares (2nd Year Intake Assistant)	email to client, email rev, email to team, rev docs	0.25	\$150.00	\$37.50
10/18/23	Breck Oyama (15+ Year Paralegal)	review file, update calendar/deadlines	0.25	\$300.00	\$75.00
10/18/23	Daniela Linares (2nd Year Intake Assistant)	email rev	0.08	\$150.00	\$12.00
10/19/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Call w/ NG re Jury Fees.	0.75	\$200.00	\$150.00
10/19/23	Nora Greer (15+ Year Paralegal)	Assist NEB with Filing, Case Anywhere, Review emails	1.33	\$200.00	\$266.00
10/20/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Update POS w/ Plaintiff counsel for related case.	0.50	\$200.00	\$100.00
10/20/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	File and Serve Ntc of Jury Fees; enter expenses; send courtesy copy to client.	0.75	\$200.00	\$150.00
10/20/23	Breck Oyama (15+ Year Paralegal)	review emails/FV/filing, email tasks to NEB	0.17	\$300.00	\$51.00
10/23/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	File & serve 1AC; calendar deadlines; enter expenses.	2.25	\$200.00	\$450.00
10/24/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Confirm Court Order saved to file and sent to client.	0.17	\$200.00	\$34.00
10/25/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Save documents.	0.08	\$200.00	\$16.00
10/25/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Update PAGA lit Chain.	0.17	\$200.00	\$34.00
10/25/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive email from CaseAnywhere and fwd to team.	0.08	\$200.00	\$16.00
10/25/23	Nora Greer (15+ Year Paralegal)	Assist NEB with uploading 1AC to LWDA	0.25	\$200.00	\$50.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
10/27/23	Nora Greer (15+ Year Paralegal)	Assist with Filing 1AC and case tasks	1.83	\$200.00	\$366.00
11/3/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive OLC Invoice, save and enter expense.	0.17	\$200.00	\$34.00
11/7/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive invoice from Case Anywhere, save to file and enter expense.	0.08	\$200.00	\$16.00
12/28/23	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Confirm deadlines met re 1 year sol.	0.08	\$200.00	\$16.00
1/2/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	f/u with team regarding upcoming deadline for Joint Status Report.	0.08	\$200.00	\$16.00
1/3/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive and review email from OC re meet and confer for ISC; review calendar and respond; update calendar and send RC invite to OC Gabriel Hemphill.	0.25	\$200.00	\$50.00
1/4/24	David Spivak (28+ Year Attorney)	meet and confer with OC for ISC; instructions to staff	0.33	\$900.00	\$297.00
1/4/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive and review DGS instructions/email; research related cases for documents requested(MX to Compel ARB and supporting docs; Complaint); look for settlement information; save documents to file and email team; review discovery tab for propounding discovery	1.25	\$200.00	\$250.00
1/4/24	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	joint isc statement/msg team/review filed/emails/calendar/OC	1.67	\$250.00	\$417.50
1/8/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive and review draft JSR, save to file; scrub and send to OC for review and further drafting.	0.25	\$200.00	\$50.00
1/8/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	f/u with team re JSR.	0.08	\$200.00	\$16.00
1/8/24	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	isc joint statement/email team/oc	2.00	\$250.00	\$500.00
1/9/24	Emily Ly (3rd Year Paralegal)	Call to OC.Served, filed, and circulated jsr. Emailed team.	0.67	\$150.00	\$100.50
1/9/24	Daniela Linares (2nd Year Intake Assistant)	email and snooze jury fees	0.08	\$150.00	\$12.00
1/9/24	Henry Michael (1st Year Intern)	Entering Lexis expense	0.08	\$150.00	\$12.00
1/9/24	Maya Cheaitani (Formerly Employed 2nd Year Attorney)	joint isc/oc emails/fv review/calendar	1.25	\$250.00	\$312.50
1/9/24	Breck Oyama (15+ Year Paralegal)	review emails/FV, emails w/ team	0.17	\$300.00	\$51.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
1/10/24	Breck Oyama (15+ Year Paralegal)	reviewe emails/filing	0.17	\$300.00	\$51.00
1/12/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Email review.	0.08	\$200.00	\$16.00
1/12/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Send client copy of JSR;Enter LA Court expense and save receipt to file; confirm other filing expenses entered; f/u w/ team re HR dpeo.	0.25	\$200.00	\$50.00
1/16/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Schedule Court Connect Appearance for hearing on 1.17.24; update calendar; save confirmaiton informaiton.	0.17	\$200.00	\$34.00
1/17/24	Nora Greer (15+ Year Paralegal)	Prepare Spec Rogs, and PO, review emails, review client docs	0.58	\$200.00	\$116.00
1/17/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Check Lexis for Minute Order.	0.08	\$200.00	\$16.00
1/17/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	f/u with atty's re meeting scheduled for today; review docket and lexis for filed copy of Pltf's Ntc of Posting Jury Fees and RC chat with LS re same.	0.25	\$200.00	\$50.00
1/17/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Prepare Form Interrogatories General and Employment, and Request for Production of Documents; Belaire West Stip/Order, review file and complaint for relative information for drafting; confer w/ NG and send to DGS for review.	1.00	\$200.00	\$200.00
1/17/24	Laura Solorzano (1st Year Intake Assistant)	rc with NEB, search for case docs	0.17	\$150.00	\$25.50
1/17/24	David Spivak (28+ Year Attorney)	prep for ISC, attend hearing and notes to staff	0.75	\$900.00	\$675.00
1/18/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	call w/ NG re depo/fv.	0.50	\$200.00	\$100.00
1/18/24	David Spivak (28+ Year Attorney)	review and revise discovery requests	0.75	\$900.00	\$675.00
1/18/24	Nora Greer (15+ Year Paralegal)	TC with NEB re Depo	0.50	\$200.00	\$100.00
1/18/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Finalize discovery for signature and service; draft pmq depo notice; update pos with all OC's; serve discovery unto defendants; calendar deadlines for responses; send client copy.	2.50	\$200.00	\$500.00
1/19/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Revise discovery calendar deadline entry per BO.	0.08	\$200.00	\$16.00
1/19/24	Daniela Linares (2nd Year Intake Assistant)	email rev, online search	0.75	\$150.00	\$112.50

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
1/19/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	confirm service via caseanywhere for discovery; revise proof of service for all discovery and reserve via case anywhere	0.75	\$200.00	\$150.00
1/22/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive PMQ Depo Ntc; finalize for service and serve via CaseAnywhere.	0.25	\$200.00	\$50.00
1/22/24	David Spivak (28+ Year Attorney)	review personnel file; edit PMQ depo notice	0.17	\$900.00	\$153.00
1/22/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive receipt re related case opposition- save to file and enter expense.	0.08	\$200.00	\$16.00
1/22/24	Daniela Linares (2nd Year Intake Assistant)	email to team	0.17	\$150.00	\$25.50
1/24/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Update litigation chain re D's discovery responses for Set 1 per BO.	0.17	\$200.00	\$34.00
1/30/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Updated calendar entries re MX to Compel Arb and other misc calendar reminders.	0.08	\$200.00	\$16.00
2/1/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive OLC Invoice, save and enter expense.	0.08	\$200.00	\$16.00
2/2/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive written discovery and depo notice from Def., save to file, calendar response deadline(s) and advise DGS of PL noticed depo for March 12, send follow up re depo.	0.17	\$200.00	\$34.00
2/2/24	Daniela Linares (2nd Year Intake Assistant)	email to dgs, email rev	0.08	\$150.00	\$12.00
2/5/24	Daniela Linares (2nd Year Intake Assistant)	call w client, email to client, email to team, tc w neb	0.42	\$150.00	\$63.00
2/6/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive CaseAnywhere Invoice, save to file and enter expense.	0.08	\$200.00	\$16.00
2/7/24	Daniela Linares (2nd Year Intake Assistant)	text to client, email to team	0.08	\$150.00	\$12.00
2/7/24	Daniela Linares (2nd Year Intake Assistant)	email to client, email to team	0.08	\$150.00	\$12.00
2/7/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Email correspondence w/ team re depo sechedules; update calendar re discovery responses.	0.17	\$200.00	\$34.00
2/7/24	Breck Oyama (15+ Year Paralegal)	review emails/calendar, email team re schedule	0.42	\$300.00	\$126.00
2/8/24	Daniela Linares (2nd Year Intake Assistant)	call w client email to team, email to client	0.17	\$150.00	\$25.50
2/9/24	Daniela Linares (2nd Year Intake Assistant)	email to OC	0.08	\$150.00	\$12.00
2/9/24	Daniela Linares (2nd Year Intake Assistant)	email	0.08	\$150.00	\$12.00
2/9/24	Daniela Linares (2nd Year Intake Assistant)	Calendar entry, email to oc	0.08	\$150.00	\$12.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
2/16/24	Daniela Linares (2nd Year Intake Assistant)	email and calendar rev. tc w neb	0.17	\$150.00	\$25.50
2/20/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Email correspondence with team re coordinating depo prep and depo.	0.17	\$200.00	\$34.00
2/21/24	Daniela Linares (2nd Year Intake Assistant)	tc w neb, email rev	0.17	\$150.00	\$25.50
2/21/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Email correspondence with OC re changing depo time; save and circulate amended notice.	0.17	\$200.00	\$34.00
2/21/24	Daniela Linares (2nd Year Intake Assistant)	email rev	0.08	\$150.00	\$12.00
2/21/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive Def discovery responses, set 1; save to file, send to team and calculate mx to compel deadline, add lit chain and update calendar.	0.50	\$200.00	\$100.00
2/21/24	Nora Greer (15+ Year Paralegal)	TC with NEB re Depo/Discovery	0.67	\$200.00	\$134.00
2/22/24	Breck Oyama (15+ Year Paralegal)	review emails/FV, send tasks to team	0.17	\$300.00	\$51.00
2/22/24	Daniela Linares (2nd Year Intake Assistant)	tc w neb, client docs rev	0.17	\$150.00	\$25.50
2/22/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Email review- update mx compel deadline chain.	0.17	\$200.00	\$34.00
2/23/24	Daniela Linares (2nd Year Intake Assistant)	call w client, rev emails, tc w neb.	0.17	\$150.00	\$25.50
2/23/24	Daniela Linares (2nd Year Intake Assistant)	combine depo docs	0.17	\$150.00	\$25.50
2/26/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	RC messages and call w/ DL re depo prep.	0.17	\$200.00	\$34.00
2/26/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	RC messages w/ DL re depo prep.	0.08	\$200.00	\$16.00
2/26/24	Daniela Linares (2nd Year Intake Assistant)	email and calendar rev, tc w neb, drafting lt for client	0.42	\$150.00	\$63.00
2/26/24	Daniela Linares (2nd Year Intake Assistant)	exhibits, tc w neb	0.33	\$150.00	\$49.50
2/26/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	RC messages w/ DL re client letter	0.67	\$200.00	\$134.00
2/26/24	Daniela Linares (2nd Year Intake Assistant)	rev depo exhibits, finalize letter re depo, call w client, tc w neb	0.58	\$150.00	\$87.00
2/26/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email correspondence with client re deposition	0.08	\$200.00	\$16.00
2/27/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	save def doc production and circulate.	0.08	\$200.00	\$16.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
2/28/24	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
2/28/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	depo prep	3.00	\$200.00	\$600.00
2/28/24	Laura Solorzano (1st Year Intake Assistant)	review emails, rc with NEB, search SOS	0.17	\$150.00	\$25.50
2/29/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Prepare special interrogatory and r4p response and objections.	2.33	\$200.00	\$466.00
2/29/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Review and revise Form Rogs, general responses.	0.08	\$200.00	\$16.00
3/1/24	Daniela Linares (2nd Year Intake Assistant)	email to client, email and text rev	0.17	\$150.00	\$25.50
3/1/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Email client docs; phone call with client to go over questions about documents from DGS email; email DGS and team client's response; troubleshoot client's trouble with logging into RC.	1.33	\$200.00	\$266.00
3/5/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	f/u with DGS and BO re discovery responses.	0.17	\$200.00	\$34.00
3/5/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Messages w/ PLs re R4P no documents; call w/ LC re same.	0.25	\$200.00	\$50.00
3/5/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Text client re remembering signing docs.	0.08	\$200.00	\$16.00
3/5/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	messages w/ LC and BO re r4p no docs/call w/ LC re same.	0.25	\$200.00	\$50.00
3/5/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Serve discovery responses via Case Anywhere; send to OC via email; send client copy	0.25	\$200.00	\$50.00
3/5/24	Breck Oyama (15+ Year Paralegal)	review emails re status, msg team re discovery resps	0.08	\$300.00	\$24.00
3/5/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive DGS discovery and revise; finalize and send for signature.	1.17	\$200.00	\$234.00
3/7/24	Daniela Linares (2nd Year Intake Assistant)	email rev	0.17	\$150.00	\$25.50
3/7/24	Daniela Linares (2nd Year Intake Assistant)	tc w neb re calendar	0.08	\$150.00	\$12.00
3/7/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Call with client re zoom training to ensure login successfully for deposition.	0.58	\$200.00	\$116.00
3/8/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	f/u with DGS re client deposition and stratgey	0.17	\$200.00	\$34.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
3/13/24	Breck Oyama (15+ Year Paralegal)	review emails	0.08	\$300.00	\$24.00
3/22/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive and download to file depo transcript; calendar deadline for errata; circulate to team and f/u re summary.	0.50	\$200.00	\$100.00
3/22/24	Nora Greer (15+ Year Paralegal)	TC with NEB re Depo	0.25	\$200.00	\$50.00
3/22/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Call w/ NG re depo.	0.25	\$200.00	\$50.00
3/22/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	RC messages w/ NG re language for depo transcript to client; calendar deadline for response; send to client.	0.25	\$200.00	\$50.00
4/2/24	Daniela Linares (2nd Year Intake Assistant)	email rev	0.08	\$150.00	\$12.00
4/2/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	discovery summary; emails/texts with client re verification for depo.	1.25	\$200.00	\$250.00
4/4/24	Laura Solorzano (1st Year Intake Assistant)	fw emails to fv and respond to emails	0.08	\$150.00	\$12.00
4/8/24	Breck Oyama (15+ Year Paralegal)	review emails/deadline chain	0.08	\$300.00	\$24.00
4/8/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email/update calendar re mx compel deadline/lit chain	0.08	\$200.00	\$16.00
4/9/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Summarize D's disco responses; email team	1.17	\$200.00	\$234.00
4/10/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Email review/update calendar.	0.08	\$200.00	\$16.00
4/12/24	Daniela Linares (2nd Year Intake Assistant)	email rev	0.08	\$150.00	\$12.00
4/14/24	David Spivak (28+ Year Attorney)	review NEB summary of discovery responses	0.25	\$900.00	\$225.00
4/17/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Review calendar/caseanywhere re pmq depo; email oc.	0.25	\$200.00	\$50.00
4/18/24	Breck Oyama (15+ Year Paralegal)	review emails, save docs to file, email Esquire re signed depo	0.42	\$300.00	\$126.00
4/30/24	Breck Oyama (15+ Year Paralegal)	update calendar and mx compel deadline litigation chain	0.08	\$300.00	\$24.00
4/30/24	Breck Oyama (15+ Year Paralegal)	review emails/FV, f/u w/ team re mx compel and email OC for extension	0.25	\$300.00	\$75.00
5/7/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Review discovery responses and update discovery summary re form interrogatories general responses.	1.25	\$200.00	\$250.00
5/8/24	Daniela Linares (2nd Year Intake Assistant)	email rev, tc w neb, call to client - lvm, text to client	0.33	\$150.00	\$49.50

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
5/8/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	save/enter expense; review fv feed re emails; draft email to team; RC messages with DL re f/u DGS email re research,	0.25	\$200.00	\$50.00
5/9/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email review; email client; RC team call; call with DL.	0.25	\$200.00	\$50.00
5/9/24	Daniela Linares (2nd Year Intake Assistant)	email rev, tc w team, call w client, email to team	0.42	\$150.00	\$63.00
5/10/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	review calendar/deadline chains; update tasks.	0.08	\$200.00	\$16.00
5/13/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive Lexis alert; download MX Compel Arb and supporting docs; calendar hearing; receive Stip and PO from OC, revise and send all docs to DGS and team.	0.50	\$200.00	\$100.00
5/14/24	David Spivak (28+ Year Attorney)	review and revise stip to arbitrate	0.25	\$900.00	\$225.00
5/14/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	update calendar/texts with client; save/circulate served docs.	0.08	\$200.00	\$16.00
5/14/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	call with client and dgs re case status; email docs to client; email dgs re stip to continue; review file.	0.67	\$200.00	\$134.00
5/14/24	David Spivak (28+ Year Attorney)	call with client and Nazie re arbitration stipulation and dismissal of class claims	0.08	\$900.00	\$72.00
5/14/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	receive final version of Stip from OC, get signed and return signed copy to OC.	0.17	\$200.00	\$34.00
5/14/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	review calendar; text client re call with dgs	0.17	\$200.00	\$34.00
5/14/24	Daniela Linares (2nd Year Intake Assistant)	email and text rev	0.17	\$150.00	\$25.50
5/16/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email review; calendar reminder re stip/order	0.08	\$200.00	\$16.00
5/16/24	Breck Oyama (15+ Year Paralegal)	review emails/FV/status, email tasks to team	0.08	\$300.00	\$24.00
5/20/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	update calendar; check lexis again; save/circulate filed copy of stip; f/u dgs re stip for isc.	0.42	\$200.00	\$84.00
5/20/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Email review; review docket/lexis for stip/order(not available), f/u dgs re depo	0.17	\$200.00	\$34.00
5/22/24	Breck Oyama (15+ Year Paralegal)	check docket re order on stip	0.08	\$300.00	\$24.00
5/24/24	Breck Oyama (15+ Year Paralegal)	check docket re order on stip arb, circulate and update calendar	0.33	\$300.00	\$99.00
5/24/24	Daniela Linares (2nd Year Intake Assistant)	email rev, email to client	0.17	\$150.00	\$25.50

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
5/24/24	Breck Oyama (15+ Year Paralegal)	add/create deadline chain re arb	0.08	\$300.00	\$24.00
5/30/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email review, update calendar re stmt of claims.	0.17	\$200.00	\$34.00
5/30/24	Breck Oyama (15+ Year Paralegal)	review emails/calendar re arb SOC	0.08	\$300.00	\$24.00
6/12/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email review; send filed order to team and client; review calendar.	0.50	\$200.00	\$100.00
6/13/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email review re arb complaint.	0.08	\$200.00	\$16.00
6/13/24	Breck Oyama (15+ Year Paralegal)	prep SOC for arb	0.83	\$300.00	\$249.00
6/14/24	David Spivak (28+ Year Attorney)	review and revise complaint in arbitration	0.25	\$900.00	\$225.00
6/17/24	Breck Oyama (15+ Year Paralegal)	finalize arb SOC	0.17	\$300.00	\$51.00
6/17/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	ARB SOC, sign, update POS, review arb agreement, review templates.	0.50	\$200.00	\$100.00
6/20/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	begin submitting soc to jams/review arb agreement	0.67	\$200.00	\$134.00
6/20/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	finalzie ARB submission, cover letter, attachments, serve on oc, upload pos to jams, send to team.	1.50	\$200.00	\$300.00
6/21/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email review; update arb tab.	0.08	\$200.00	\$16.00
6/24/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email review/send client arb docs.	0.08	\$200.00	\$16.00
6/27/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email review re JAMS contact person, update vcard, email JAMS and email team.	0.17	\$200.00	\$34.00
6/27/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email correspondence with Amy Thornton, JAMS contact.	0.08	\$200.00	\$16.00
7/2/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive Schultz's response to Calimant's Request for ARB; save and circulate with team	0.17	\$200.00	\$34.00
7/2/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	review deadline chains and update arb order chain.	0.08	\$200.00	\$16.00
7/5/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	update discovery models tab.	0.17	\$200.00	\$34.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre- Multiplier Lodestar Amount
7/9/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Email correspondence with team re Esquire invoice; save/enter expense.	0.08	\$200.00	\$16.00
7/18/24	Breck Oyama (15+ Year Paralegal)	review emails	0.08	\$300.00	\$24.00
7/18/24	Henry Michael (1st Year Intern)	Entering Lexis expense	0.08	\$150.00	\$12.00
8/7/24	Daniela Linares (2nd Year Intake Assistant)	saved and entered expense	0.08	\$150.00	\$12.00
8/12/24	Daniela Linares (2nd Year Intake Assistant)	email rev, saved docs, email to team, rev expenses	0.25	\$150.00	\$37.50
8/13/24	Nora Greer (15+ Year Paralegal)	Review/Respond Team emails, email to JAMS	0.17	\$200.00	\$34.00
8/14/24	Daniela Linares (2nd Year Intake Assistant)	email rev, save docs, email to client	0.25	\$150.00	\$37.50
8/16/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) email review, call with DL re docs to client; review lexis/docket for updates, confirm calendar updated	0.58	\$200.00	\$116.00
8/21/24	Daniela Linares (2nd Year Intake Assistant)	emails, email to client	0.25	\$150.00	\$37.50
8/29/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) receive/review notice commencement/strike & rank list; save doc, update calendar, email team.	0.17	\$200.00	\$34.00
9/9/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) finalize letter for signature	0.17	\$200.00	\$34.00
9/9/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) draft rank/strike list letter, send to DGS for review.	0.42	\$200.00	\$84.00
9/17/24	Breck Oyama (15+ Year Paralegal)	review docket/calendar/emails, email tasks to NEB	0.50	\$300.00	\$150.00
9/17/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email/task review.	0.08	\$200.00	\$16.00
9/30/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) review/respond to emails; save/circulate JAMS docs, send to client, update ARB tab.	0.42	\$200.00	\$84.00
10/21/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Review/respond to emails, update case summary re additional OC.	0.08	\$200.00	\$16.00
10/21/24	David Spivak (28+ Year Attorney)	prepare arbitration report	3.08	\$900.00	\$2,772.00
10/21/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Receive/review Notice from JAMS; update calendar; save/circulate with team.	0.17	\$200.00	\$34.00
10/22/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) review/respond to emails/RC messages with DGS re joint report; review calendar re meet and confer; email oc; update calendar; fv feed review; reupdate case summary tab.	1.00	\$200.00	\$200.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
10/22/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) review/respond to team emails; review/revise joint report; scrub and send to OC	0.33	\$200.00	\$66.00
10/24/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) review/respond to email from OC; update calendar re call; send invite to OC; save revised report & send to dgs; review emails	0.25	\$200.00	\$50.00
10/24/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) receive and review email from DGS; review previous emails to and from OC; email OC re communications with TSLF; email dgs	0.25	\$200.00	\$50.00
10/24/24	David Spivak (28+ Year Attorney)	review client file for supervisor and HR names; email DL instructions	0.58	\$900.00	\$522.00
10/24/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) RC with. DGS re m&c call, f/u with OC.	0.17	\$200.00	\$34.00
10/28/24	Daniela Linares (2nd Year Intake Assistant)	linked in search for staff	0.50	\$150.00	\$75.00
10/28/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	review respond to emails/RC chat; search for paga cases for D; messages with DL	0.33	\$200.00	\$66.00
10/28/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	further search/attempt to download paga documents for cases.	0.25	\$200.00	\$50.00
10/29/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) email review re data entry; confer with staff re data entry providers.	0.08	\$200.00	\$16.00
10/29/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	email review/update task list re data entry	0.08	\$200.00	\$16.00
10/29/24	David Spivak (28+ Year Attorney)	review personnel, time and payroll records; questions about records and job descriptions to client	2.58	\$900.00	\$2,322.00
10/29/24	David Spivak (28+ Year Attorney)	call with client re time keeping practices and MRB	0.08	\$900.00	\$72.00
10/31/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) Send JSR to OC.	0.08	\$200.00	\$16.00
10/31/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	Email review; review jsr for finalizing; ask DGS about #9.	0.25	\$200.00	\$50.00
10/31/24	Daniela Linares (2nd Year Intake Assistant)	email review, call w client	0.50	\$150.00	\$75.00
11/1/24	David Spivak (28+ Year Attorney)	prepare for arbitration conference	0.25	\$900.00	\$225.00
11/1/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) review records to send to data entry; email DGS.	0.17	\$200.00	\$34.00
11/1/24	Daniela Linares (2nd Year Intake Assistant)	email review	0.17	\$150.00	\$25.50
11/1/24	David Spivak (28+ Year Attorney)	participate in zoom arbitration conference; notes to staff	0.67	\$900.00	\$603.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
11/1/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) Communications with DGS during ARB Conference; email review; save hearing notes.	0.58	\$200.00	\$116.00
11/1/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) email correspondence with DGS re data entry and scheduling order; review/save/circulate scheduling order	0.17	\$200.00	\$34.00
11/1/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) review time/payroll recs; emails with DGS; send to Ethan; receive, save and circulate scheduling order from JAMS; emails with DGS re same.	0.75	\$200.00	\$150.00
11/4/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) review/respond emails from iBridge re data entry; confer with DGS/BO re approval of expense; email Ethan approval.	0.17	\$200.00	\$34.00
11/5/24	Daniela Linares (2nd Year Intake Assistant)	email review	0.17	\$150.00	\$25.50
11/6/24	David Spivak (28+ Year Attorney)	saved and entered expense	0.08	\$900.00	\$72.00
11/18/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) review/respond to emails; update calendar re ARB deadlines; emails with DGS re Rule 17 Disclosures	0.50	\$200.00	\$100.00
11/18/24	David Spivak (28+ Year Attorney)	prepare Rule 17 initial disclosures statement	1.58	\$900.00	\$1,422.00
11/20/24	Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	(ARB) Review/respond emails; prepare Rule 17 Disclosure Pleading	0.50	\$200.00	\$100.00
11/22/24	Nora Greer (15+ Year Paralegal)	Review emails, TC with DL re Initial Disclosures	0.25	\$200.00	\$50.00
11/22/24	Daniela Linares (2nd Year Intake Assistant)	email to client	0.08	\$150.00	\$12.00
11/22/24	Daniela Linares (2nd Year Intake Assistant)	email review, call w bo, initial disclosures	1.67	\$150.00	\$250.50
11/22/24	Lizzett Cortez (10+ Year Paralegal)	Call w/ EL re review on initial disclosures. messages w/ team	0.42	\$250.00	\$105.00
11/22/24	Daniela Linares (2nd Year Intake Assistant)	finalized and served, call w ng	0.33	\$150.00	\$49.50
11/22/24	Emily Ly (3rd Year Paralegal)	Reviewed JAMS Rule 17. Reviewed initial disclosures and call with LC. Calls with DL re initial disclosures.	1.00	\$150.00	\$150.00
11/22/24	Daniela Linares (2nd Year Intake Assistant)	review ehl redlines, review dgs comparison, call w ehl, call w bo, email to dgs re review	0.42	\$150.00	\$63.00
11/22/24	Breck Oyama (15+ Year Paralegal)	mtg w/ DL re IDs	0.50	\$300.00	\$150.00
11/25/24	Breck Oyama (15+ Year Paralegal)	review emails and arb deadlines, email tasks to team	0.25	\$300.00	\$75.00
11/25/24	Nora Greer (15+ Year Paralegal)	Review JAMS emails, save Respondent's Initial Disclosure to file, circulate to team, email to CL	0.17	\$200.00	\$34.00
11/26/24	Nora Greer (15+ Year Paralegal)	Review client docs, prepare initial document disclosures, serve same, email to Jam re typo	0.58	\$200.00	\$116.00
11/26/24	Daniela Linares (2nd Year Intake Assistant)	email review from client	0.08	\$150.00	\$12.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
11/26/24	Nora Greer (15+ Year Paralegal)	Review emails	0.17	\$200.00	\$34.00
11/26/24	Nora Greer (15+ Year Paralegal)	Circulate document disclosures to CL	0.08	\$200.00	\$16.00
11/26/24	Daniela Linares (2nd Year Intake Assistant)	email review, sent client emails, tc w ng	0.50	\$150.00	\$75.00
11/27/24	Nora Greer (15+ Year Paralegal)	Review/Respond AAA emails re deadline typo	0.08	\$200.00	\$16.00
12/9/24	Nora Greer (15+ Year Paralegal)	Review/respond emails, save/circulate docs to file	0.25	\$200.00	\$50.00
12/9/24	Nora Greer (15+ Year Paralegal)	Email recently received docs to client	0.08	\$200.00	\$16.00
12/13/24	Nora Greer (15+ Year Paralegal)	Save served docs to file and circulate	0.08	\$200.00	\$16.00
12/13/24	Nora Greer (15+ Year Paralegal)	Circulate served docs to client	0.08	\$200.00	\$16.00
12/16/24	David Spivak (28+ Year Attorney)	review discovery plan	0.25	\$900.00	\$225.00
12/16/24	David Spivak (28+ Year Attorney)	call with client re witnesses	0.25	\$900.00	\$225.00
12/16/24	Nora Greer (15+ Year Paralegal)	Review emails	0.08	\$200.00	\$16.00
12/16/24	David Spivak (28+ Year Attorney)	assemble witness list	1.25	\$900.00	\$1,125.00
12/16/24	Breck Oyama (15+ Year Paralegal)	review emails, post msg board JAMS	0.17	\$300.00	\$51.00
12/16/24	David Spivak (28+ Year Attorney)	call with OC re discovery plan and witnesses	0.25	\$900.00	\$225.00
12/18/24	Nora Greer (15+ Year Paralegal)	Circulate joint discovery plan to CL	0.08	\$200.00	\$16.00
12/18/24	Nora Greer (15+ Year Paralegal)	Finalize Joint Discovery Plan, submit to JAMS, serve OC	0.25	\$200.00	\$50.00
12/18/24	Daniela Linares (2nd Year Intake Assistant)	fwd email to ng	0.08	\$150.00	\$12.00
12/19/24	Nora Greer (15+ Year Paralegal)	Review/Respond email re service list, update POS	0.17	\$200.00	\$34.00
1/17/25	Nora Greer (15+ Year Paralegal)	Review emails, save and circulate call conf. to file, update calendar, review additional emails	0.25	\$200.00	\$50.00
1/22/25	Nora Greer (15+ Year Paralegal)	Review/Respond additional emails, circulate conf. call confirmation, update calendar	0.08	\$200.00	\$16.00
1/22/25	Nora Greer (15+ Year Paralegal)	Review emails on FV, email to DGS re Depos, email to Jams re Notice, email OC re Depo Dates	0.25	\$200.00	\$50.00
1/27/25	David Spivak (28+ Year Attorney)	Review discovery plan; review notes on deponents; prepare for conference; attend conference by zoom; instructions to Nora	0.33	\$900.00	\$297.00
1/27/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
1/27/25	Daniela Linares (2nd Year Intake Assistant)	review team chat	0.08	\$150.00	\$12.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
1/28/25	Nora Greer (15+ Year Paralegal)	Email DGS re Notes, Save Notes to file	0.08	\$200.00	\$16.00
1/28/25	Nora Greer (15+ Year Paralegal)	Email OC re conf. call availability	0.08	\$200.00	\$16.00
1/29/25	Nora Greer (15+ Year Paralegal)	Send CL scheduling order #2	0.08	\$200.00	\$16.00
1/29/25	Nora Greer (15+ Year Paralegal)	Review emails re Mediation	0.08	\$200.00	\$16.00
1/29/25	Nora Greer (15+ Year Paralegal)	Send CL mediation email	0.08	\$200.00	\$16.00
1/29/25	David Spivak (28+ Year Attorney)	RESEARCH RELATED CASES; call with OC re mediation; email Drexler	0.67	\$900.00	\$603.00
1/29/25	Nora Greer (15+ Year Paralegal)	Review emails, save documents to file, update calendar, staff chats, review competing cases, paga searches	0.67	\$200.00	\$134.00
2/3/25	David Spivak (28+ Year Attorney)	call with OC, call with Drexler re settlement mediation	0.33	\$900.00	\$297.00
2/5/25	Nora Greer (15+ Year Paralegal)	F/U email to DGS re CC/Mediation	0.08	\$200.00	\$16.00
2/5/25	Nora Greer (15+ Year Paralegal)	Review calendar, email OC re continuance	0.17	\$200.00	\$34.00
2/6/25	Nora Greer (15+ Year Paralegal)	Review emails re mediation	0.08	\$200.00	\$16.00
2/6/25	Nora Greer (15+ Year Paralegal)	Enter expense to file	0.08	\$200.00	\$16.00
2/7/25	Daniela Linares (2nd Year Intake Assistant)	email	0.08	\$150.00	\$12.00
2/7/25	Nora Greer (15+ Year Paralegal)	Review emails re stip to cont state court case	0.08	\$200.00	\$16.00
2/10/25	Nora Greer (15+ Year Paralegal)	Review emails re stip to continue	0.08	\$200.00	\$16.00
2/11/25	David Spivak (28+ Year Attorney)	review cocounsel agreement	0.25	\$900.00	\$225.00
2/11/25	Nora Greer (15+ Year Paralegal)	Review emails re joint prosecution agreement, save docs to file, review/respond emails re mediation, emails to 2 mediators re availability, review calendar	0.50	\$200.00	\$100.00
2/18/25	Nora Greer (15+ Year Paralegal)	F/U email to CC re JPA	0.08	\$200.00	\$16.00
2/21/25	Lizzett Cortez (10+ Year Paralegal)	responded to ibrige and forwarded to NG re invoice	0.08	\$250.00	\$20.00
2/21/25	Nora Greer (15+ Year Paralegal)	Emails with CC re JPA, update calendar, emails to Mediator	0.25	\$200.00	\$50.00
2/21/25	Nora Greer (15+ Year Paralegal)	Enter expense to file, send to controller, email vendor re invoice	0.17	\$200.00	\$34.00
2/21/25	Nora Greer (15+ Year Paralegal)	F/U email to CC	0.08	\$200.00	\$16.00
2/21/25	Nora Greer (15+ Year Paralegal)	appearance info to calendar, review/respond emails	0.17	\$200.00	\$34.00
2/24/25	Daniela Linares (2nd Year Intake Assistant)	email review, tc w team	0.17	\$150.00	\$25.50

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
2/24/25	Nora Greer (15+ Year Paralegal)	Email to Mediator re fee split	0.08	\$200.00	\$16.00
2/24/25	Nora Greer (15+ Year Paralegal)	LVM and Text to Client	0.08	\$200.00	\$16.00
2/24/25	Nora Greer (15+ Year Paralegal)	Text to Client	0.08	\$200.00	\$16.00
2/26/25	Nora Greer (15+ Year Paralegal)	Circulate Notice of Mediation to CL	0.08	\$200.00	\$16.00
2/26/25	Nora Greer (15+ Year Paralegal)	Update litigation chain	0.08	\$200.00	\$16.00
2/26/25	Nora Greer (15+ Year Paralegal)	Save hearing notes to file, update calendar, obtain and circulate MO, enter mediation invoice to fv, calendar mediation deadlines, review emails, emails to DGS	0.50	\$200.00	\$100.00
2/26/25	Nora Greer (15+ Year Paralegal)	Enter Mediation Invoice to file, send invoice to Controller	0.08	\$200.00	\$16.00
2/26/25	Lizzett Cortez (10+ Year Paralegal)	emails and forwarded invoice to NG	0.08	\$250.00	\$20.00
3/4/25	Nora Greer (15+ Year Paralegal)	Review/Respond vendor email, email same to controller	0.08	\$200.00	\$16.00
3/5/25	Nora Greer (15+ Year Paralegal)	Circulate JPA to CL and DGS for signature, email to CL re same	0.17	\$200.00	\$34.00
3/5/25	Nora Greer (15+ Year Paralegal)	Review emails, save draft of JPA to file	0.08	\$200.00	\$16.00
3/6/25	Nora Greer (15+ Year Paralegal)	Enter expense to file	0.08	\$200.00	\$16.00
3/6/25	Nora Greer (15+ Year Paralegal)	Circulate signed JPA to CC, review emails, review stip to cont.	0.17	\$200.00	\$34.00
3/7/25	Nora Greer (15+ Year Paralegal)	Review emails, email to expert re missing invoice	0.08	\$200.00	\$16.00
3/11/25	Nora Greer (15+ Year Paralegal)	Review/Respond OC emails	0.08	\$200.00	\$16.00
3/12/25	Nora Greer (15+ Year Paralegal)	Save/Circulate submitted Stip and Order to Continue Arb to team	0.08	\$200.00	\$16.00
3/12/25	Nora Greer (15+ Year Paralegal)	Circulate Stip to Continue Arb and Proposed Order to CL	0.08	\$200.00	\$16.00
3/18/25	Daniela Linares (2nd Year Intake Assistant)	email review, emails to ng, tc w team	0.33	\$150.00	\$49.50
3/18/25	Nora Greer (15+ Year Paralegal)	Review FV, staff chats, review/respond to JAMS email re call, review calendar for availability	0.25	\$200.00	\$50.00
3/19/25	Nora Greer (15+ Year Paralegal)	Review/Respond emails re Arb Conf. Call, review calendar for availability	0.17	\$200.00	\$34.00
3/20/25	Nora Greer (15+ Year Paralegal)	Review/Respond Arb emails re Conf. Call, update calendar	0.17	\$200.00	\$34.00
3/20/25	Nora Greer (15+ Year Paralegal)	Save Notice of Zoom Conf. Call	0.17	\$200.00	\$34.00
3/24/25	Nora Greer (15+ Year Paralegal)	Save/Circulate Scheduling Order 3, update calendar re same	0.50	\$200.00	\$100.00
3/24/25	Daniela Linares (2nd Year Intake Assistant)	emails	0.08	\$150.00	\$12.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
3/24/25	Nora Greer (15+ Year Paralegal)	Circulate Scheduling Order 3 to CL	0.08	\$200.00	\$16.00
3/27/25	Nora Greer (15+ Year Paralegal)	Finish updating calendar re new arb deadlines	0.08	\$200.00	\$16.00
4/7/25	Nora Greer (15+ Year Paralegal)	Enter expense to file	0.08	\$200.00	\$16.00
4/9/25	Nora Greer (15+ Year Paralegal)	Review CC's email re mediation discovery, update FV Mediation Tab, update Calendar	0.25	\$200.00	\$50.00
4/30/25	Nora Greer (15+ Year Paralegal)	Circulate served docs to CL	0.08	\$200.00	\$16.00
4/30/25	Nora Greer (15+ Year Paralegal)	Save served docs to file and circulate, update calendar	0.08	\$200.00	\$16.00
5/6/25	Nora Greer (15+ Year Paralegal)	Enter expense to file	0.08	\$200.00	\$16.00
5/12/25	Nora Greer (15+ Year Paralegal)	Save and circulate Notice of Rescheduled Zoom hearing, update calendar	0.08	\$200.00	\$16.00
5/12/25	Nora Greer (15+ Year Paralegal)	Circulate Notice of Rescheduled Zoom hearing to CL	0.08	\$200.00	\$16.00
5/23/25	Daniela Linares (2nd Year Intake Assistant)	email	0.08	\$150.00	\$12.00
6/3/25	Nora Greer (15+ Year Paralegal)	Enter expense to file	0.08	\$200.00	\$16.00
7/2/25	Daniela Linares (2nd Year Intake Assistant)	expense	0.08	\$150.00	\$12.00
7/28/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
8/5/25	Nora Greer (15+ Year Paralegal)	Enter expense to file	0.08	\$200.00	\$16.00
8/6/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
8/11/25	Nora Greer (15+ Year Paralegal)	F/U with CC re Mediation Discovery received	0.08	\$200.00	\$16.00
8/12/25	Nora Greer (15+ Year Paralegal)	Save mediation discovery to file	0.08	\$200.00	\$16.00
8/13/25	Nora Greer (15+ Year Paralegal)	Review emails, save Mediation Discovery Doc Production to file, team emails, create notes for Mediation	0.25	\$200.00	\$50.00
8/14/25	Nora Greer (15+ Year Paralegal)	Begin Future Fees and Costs for Mediation	0.33	\$200.00	\$66.00
8/14/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
8/18/25	Nora Greer (15+ Year Paralegal)	Begin Time and Costs for Mediation	0.58	\$200.00	\$116.00
8/20/25	Nora Greer (15+ Year Paralegal)	Review doc production, PAGA Searches	0.25	\$200.00	\$50.00
8/25/25	Daniela Linares (2nd Year Intake Assistant)	email to client, glassdoor review	0.25	\$150.00	\$37.50
8/26/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
8/27/25	Daniela Linares (2nd Year Intake Assistant)	email review, letter draft for client, tc w ng, doc review, email to dgs	0.33	\$150.00	\$49.50

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
8/27/25	Nora Greer (15+ Year Paralegal)	Text to CL re reminder of Mediation	0.08	\$200.00	\$16.00
8/27/25	Nora Greer (15+ Year Paralegal)	Schedule Pre Mediation call with CL	0.08	\$200.00	\$16.00
8/28/25	Daniela Linares (2nd Year Intake Assistant)	lt to client	0.17	\$150.00	\$25.50
9/2/25	Nora Greer (15+ Year Paralegal)	Schedule practice session with CL	0.08	\$200.00	\$16.00
9/2/25	Daniela Linares (2nd Year Intake Assistant)	tc w ng, email review, email to client, review texts	0.17	\$150.00	\$25.50
9/2/25	Nora Greer (15+ Year Paralegal)	Texts and Email to CL re practice session	0.08	\$200.00	\$16.00
9/2/25	Daniela Linares (2nd Year Intake Assistant)	search for def ee info	0.33	\$150.00	\$49.50
9/3/25	Nora Greer (15+ Year Paralegal)	Enter expense to file	0.08	\$200.00	\$16.00
9/5/25	Nora Greer (15+ Year Paralegal)	Review deposition transcript	0.25	\$200.00	\$50.00
9/5/25	Nora Greer (15+ Year Paralegal)	Practice session with Client	0.58	\$200.00	\$116.00
9/9/25	Nora Greer (15+ Year Paralegal)	Email Zoom info to CL	0.08	\$200.00	\$16.00
9/9/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
9/9/25	Nora Greer (15+ Year Paralegal)	Text to CL re Zoom	0.08	\$200.00	\$16.00
9/10/25	Daniela Linares (2nd Year Intake Assistant)	call w client	0.08	\$150.00	\$12.00
9/10/25	Daniela Linares (2nd Year Intake Assistant)	search of misplaced invoices	0.33	\$150.00	\$49.50
9/10/25	Nora Greer (15+ Year Paralegal)	Prepare estimated future fees and costs, staff chats re same, email to CC	0.25	\$200.00	\$50.00
9/10/25	Nora Greer (15+ Year Paralegal)	Save and circulate Mediation Brief to CL, update filevine	0.17	\$200.00	\$34.00
9/10/25	David Spivak (28+ Year Attorney)	review and revise mediation statement	0.83	\$900.00	\$747.00
9/10/25	Nora Greer (15+ Year Paralegal)	Review/Respond OC email, save docs to file	0.17	\$200.00	\$34.00
9/10/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.17	\$150.00	\$25.50
9/11/25	Nora Greer (15+ Year Paralegal)	Save Def Doc Production to File	0.08	\$200.00	\$16.00
9/11/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
9/12/25	Nora Greer (15+ Year Paralegal)	Pre Mediation call with CL and Team	0.33	\$200.00	\$66.00
9/12/25	Daniela Linares (2nd Year Intake Assistant)	pre mediation call, mediation	4.33	\$150.00	\$649.50
9/12/25	Nora Greer (15+ Year Paralegal)	Attend Mediation, save Mediation Notes to file, update calendar	4.25	\$200.00	\$850.00
9/12/25	David Spivak (28+ Year Attorney)	DGS prep for and attend mediation	6.33	\$900.00	\$5,697.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
9/18/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
9/24/25	Nora Greer (15+ Year Paralegal)	Email to OC re call with Mediator	0.08	\$200.00	\$16.00
9/30/25	Nora Greer (15+ Year Paralegal)	Review emails, staff chats	0.17	\$200.00	\$34.00
9/30/25	Nora Greer (15+ Year Paralegal)	Draft JSR and send to DGS	0.17	\$200.00	\$34.00
10/1/25	Nora Greer (15+ Year Paralegal)	Revise JSR	0.17	\$200.00	\$34.00
10/1/25	Nora Greer (15+ Year Paralegal)	Review/Respond OC email	0.08	\$200.00	\$16.00
10/1/25	Nora Greer (15+ Year Paralegal)	Review/Respond team emails, finalize joint report, send to OC	0.25	\$200.00	\$50.00
10/2/25	Nora Greer (15+ Year Paralegal)	Finalize, file, serve, circulate JSR, enter expense to file, update chain	0.25	\$200.00	\$50.00
10/2/25	Nora Greer (15+ Year Paralegal)	Circulate JSR to CL	0.08	\$200.00	\$16.00
10/2/25	Nora Greer (15+ Year Paralegal)	Save/OCR circulate filed docs	0.08	\$200.00	\$16.00
10/2/25	Nora Greer (15+ Year Paralegal)	Add appearance info to calendar	0.08	\$200.00	\$16.00
10/2/25	Nora Greer (15+ Year Paralegal)	Enter expense to file	0.08	\$200.00	\$16.00
10/8/25	Nora Greer (15+ Year Paralegal)	Circulate MO to CL	0.08	\$200.00	\$16.00
10/8/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.17	\$150.00	\$25.50
10/8/25	Nora Greer (15+ Year Paralegal)	Save served MO to file, review, circulate with team, update chain, update calendar	0.25	\$200.00	\$50.00
10/8/25	Nora Greer (15+ Year Paralegal)	Review emails, save Depo Notice to file, update chain, update calendar, review/respond oc email	0.25	\$200.00	\$50.00
10/9/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
10/9/25	Nora Greer (15+ Year Paralegal)	Review emails re settlement, update FV litigation chain	0.17	\$200.00	\$34.00
10/10/25	Nora Greer (15+ Year Paralegal)	Circulate Notice of Minute Order to CL	0.08	\$200.00	\$16.00
10/10/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
10/10/25	Nora Greer (15+ Year Paralegal)	Save served Notice of Minute Order to file	0.08	\$200.00	\$16.00
10/10/25	Nora Greer (15+ Year Paralegal)	Circulate MO to CL	0.08	\$200.00	\$16.00
10/10/25	Nora Greer (15+ Year Paralegal)	Obtain and Circulate MO, update chain, update calendar	0.17	\$200.00	\$34.00
10/15/25	Nora Greer (15+ Year Paralegal)	Review email from vendor, TC and Email to vendor	0.17	\$200.00	\$34.00
10/16/25	Nora Greer (15+ Year Paralegal)	Review emails	0.08	\$200.00	\$16.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
10/20/25	Nora Greer (15+ Year Paralegal)	Review/Respond team email, update calendar, save Mediator's proposal to file	0.17	\$200.00	\$34.00
10/20/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
10/22/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
10/23/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
10/27/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
10/30/25	Nora Greer (15+ Year Paralegal)	Email DGS re Depo Deadline, save drafts of Settlement Agreement, Notice to file	0.17	\$200.00	\$34.00
10/30/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
11/4/25	Nora Greer (15+ Year Paralegal)	Enter expense to file	0.08	\$200.00	\$16.00
11/5/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
11/5/25	Nora Greer (15+ Year Paralegal)	Enter expense to file	0.08	\$200.00	\$16.00
11/5/25	Nora Greer (15+ Year Paralegal)	Review/Respond CC email re settlement docs	0.08	\$200.00	\$16.00
11/5/25	Nora Greer (15+ Year Paralegal)	Save revised settlement docs to file	0.08	\$200.00	\$16.00
11/6/25	Nora Greer (15+ Year Paralegal)	Email OC re Depo of Calendar, staff chats, update calendar, email to DGS re CL's individual settlement	0.17	\$200.00	\$34.00
11/10/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
11/10/25	Nora Greer (15+ Year Paralegal)	Review emails, f/U email to DGS re individual settlement	0.08	\$200.00	\$16.00
11/12/25	Nora Greer (15+ Year Paralegal)	Review emails, save drafts to file, message DGS re Faustinos' Individual Settlement	0.17	\$200.00	\$34.00
11/12/25	Nora Greer (15+ Year Paralegal)	Staff chats re Individual Settlement Agreement, Revise same, circulate to OC	0.25	\$200.00	\$50.00
11/13/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
11/13/25	Nora Greer (15+ Year Paralegal)	Circulate Individual Settlement to CL with W9 and W4	0.17	\$200.00	\$34.00
11/13/25	Nora Greer (15+ Year Paralegal)	Review/Respond OC email	0.08	\$200.00	\$16.00
11/13/25	Nora Greer (15+ Year Paralegal)	Extract CL tax forms and settlement agreement, circulate to OC, update FV tasks	0.33	\$200.00	\$66.00
11/18/25	Nora Greer (15+ Year Paralegal)	F/U with OC re Individual Settlement Agreement	0.08	\$200.00	\$16.00
11/19/25	Nora Greer (15+ Year Paralegal)	Circulate fully executed individual settlement agreement to CL	0.08	\$200.00	\$16.00
11/19/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
11/19/25	Nora Greer (15+ Year Paralegal)	Review emails, save fully executed individual settlement agreement to file	0.17	\$200.00	\$34.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
11/19/25	Nora Greer (15+ Year Paralegal)	Email to OC and CC re status of paga settlement agreement	0.08	\$200.00	\$16.00
11/19/25	Nora Greer (15+ Year Paralegal)	Review emails, review costs, email to CC re same, respond to team email	0.25	\$200.00	\$50.00
11/20/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
11/20/25	Nora Greer (15+ Year Paralegal)	Circulate signed settlement agreement to OC and CC	0.08	\$200.00	\$16.00
11/20/25	Nora Greer (15+ Year Paralegal)	Circulate PAGA settlement agreement to CL via email and hellosign	0.17	\$200.00	\$34.00
11/21/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
11/24/25	Nora Greer (15+ Year Paralegal)	Send CL PAGA settlement timeline email	0.08	\$200.00	\$16.00
11/24/25	Nora Greer (15+ Year Paralegal)	Review/Save/Circulate Jams Notice of R/S hearing, review calendar	0.17	\$200.00	\$34.00
11/25/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
11/25/25	Nora Greer (15+ Year Paralegal)	Email to CL re mailing address	0.08	\$200.00	\$16.00
11/25/25	Nora Greer (15+ Year Paralegal)	Review emails	0.08	\$200.00	\$16.00
11/25/25	Nora Greer (15+ Year Paralegal)	Review emails, save signed settlement agreements to file	0.08	\$200.00	\$16.00
11/25/25	Nora Greer (15+ Year Paralegal)	Review emails, circulate fully executed PAGA agreement to CL, update calendar re individual settlement check deadline, email to DGS re dismissing Arb., email to OC re check dates	0.33	\$200.00	\$66.00
11/26/25	Nora Greer (15+ Year Paralegal)	Emails with OC, post message on JAMS re case resolved, forward to team	0.17	\$200.00	\$34.00
11/26/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.17	\$150.00	\$25.50
12/2/25	Nora Greer (15+ Year Paralegal)	Email to CL and OC re checks received	0.08	\$200.00	\$16.00
12/2/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
12/3/25	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
12/3/25	Nora Greer (15+ Year Paralegal)	Review/Respond OC emails, save FedEx Tracking to file, email CL re same	0.17	\$200.00	\$34.00
12/4/25	Nora Greer (15+ Year Paralegal)	delete calendar entries re arb	0.08	\$200.00	\$16.00
12/4/25	Nora Greer (15+ Year Paralegal)	Review/Respond CL emails re checks received, save pics of checks, email to OC re same	0.17	\$200.00	\$34.00
12/5/25	Daniela Linares (2nd Year Intake Assistant)	email review, tc w ng	0.17	\$150.00	\$25.50
12/8/25	Daniela Linares (2nd Year Intake Assistant)	client time log	1.33	\$150.00	\$199.50

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre-Multiplier Lodestar Amount
12/9/25	Daniela Linares (2nd Year Intake Assistant)	client time log	1.00	\$150.00	\$150.00
12/15/25	Nora Greer (15+ Year Paralegal)	Review/Respond JAMS message board, save messages to file, circulate to team	0.08	\$200.00	\$16.00
12/18/25	Daniela Linares (2nd Year Intake Assistant)	client time log	0.42	\$150.00	\$63.00
12/19/25	Daniela Linares (2nd Year Intake Assistant)	client time log	0.83	\$150.00	\$124.50
12/22/25	Daniela Linares (2nd Year Intake Assistant)	client time log	0.75	\$150.00	\$112.50
12/23/25	Daniela Linares (2nd Year Intake Assistant)	client time log	0.17	\$150.00	\$25.50
12/30/25	Daniela Linares (2nd Year Intake Assistant)	client time log	0.67	\$150.00	\$100.50
1/2/26	Daniela Linares (2nd Year Intake Assistant)	client time log	0.25	\$150.00	\$37.50
1/2/26	Daniela Linares (2nd Year Intake Assistant)	call w ng, call w client	0.25	\$150.00	\$37.50
1/2/26	Nora Greer (15+ Year Paralegal)	TC and Email to CL	0.08	\$200.00	\$16.00
1/2/26	Nora Greer (15+ Year Paralegal)	TC with DL	0.08	\$200.00	\$16.00
1/2/26	Nora Greer (15+ Year Paralegal)	TC with CL	0.08	\$200.00	\$16.00
1/5/26	Nora Greer (15+ Year Paralegal)	TC with DL	0.08	\$200.00	\$16.00
1/5/26	Nora Greer (15+ Year Paralegal)	Enter expense to file	0.08	\$200.00	\$16.00
1/5/26	Daniela Linares (2nd Year Intake Assistant)	client time log, call w ng re task	0.75	\$150.00	\$112.50
1/5/26	Nora Greer (15+ Year Paralegal)	TC with vendor re invoice	0.17	\$200.00	\$34.00
1/6/26	Nora Greer (15+ Year Paralegal)	Email to CC re status of Mx PAGA Approval	0.08	\$200.00	\$16.00
1/7/26	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
1/13/26	Nora Greer (15+ Year Paralegal)	F/U email to OC re Mx Paga Approval	0.08	\$200.00	\$16.00
1/14/26	Nora Greer (15+ Year Paralegal)	Review and circulate JAMS messages and It closing case	0.08	\$200.00	\$16.00
1/14/26	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
1/23/26	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
1/23/26	Nora Greer (15+ Year Paralegal)	Review emails, save mx paga approval draft, email dgs, update calendar	0.17	\$200.00	\$34.00
1/28/26	Nora Greer (15+ Year Paralegal)	Review emails, save DGS redlines to file, staff chats, review costs, create charty	0.92	\$200.00	\$184.00
1/28/26	Daniela Linares (2nd Year Intake Assistant)	email review	0.08	\$150.00	\$12.00
1/28/26	David Spivak (28+ Year Attorney)	review and review mx for approbal	0.50	\$900.00	\$450.00

TSLF TIME EXHIBIT FAUSTINOS

Date	Attorney/Paralegal	Description	Hours (Decimal)	Hourly Rate	Pre- Multiplier Lodestar Amount
1/28/26	Daniela Linares (2nd Year Intake Assistant)	review costs, tc w ng, email review	0.67	\$150.00	\$100.50
2/3/26	Nora Greer (15+ Year Paralegal)	Review file, review CL time log, staff chats, prepare CL Decl	1.33	\$200.00	\$266.00
2/3/26	Nora Greer (15+ Year Paralegal)	enter expense to file	0.08	\$200.00	\$16.00
2/3/26	Daniela Linares (2nd Year Intake Assistant)	chat w ng, review time logs	0.33	\$150.00	\$49.50
2/4/26	Nora Greer (15+ Year Paralegal)	Prepare DGS Decl., finalize CL Decl., staff chats, prepare costs exhibit, prepare time exhibit	2.25	\$200.00	\$450.00
TOTAL PRE-MULTIPLER AS OF 02/04/2026			192.07		\$54,983.50

TSLF TIME EXHIBIT FAUSTINOS

Attorney/Paralegal	Hours	Hourly Rate	Sum of Pre-Multiplier Lodestar Amount
David Spivak (28+ Year Attorney)	24.47	\$900.00	\$22,023.00
Breck Oyama (15+ Year Paralegal)	6.56	\$300.00	\$1,968.00
Lizzett Cortez (10+ Year Paralegal)	0.58	\$250.00	\$145.00
Maya Cheaitani (Formerly Employed 2nd Year Attorney)	23.84	\$250.00	\$5,960.00
Nora Greer (15+ Year Paralegal)	40.41	\$200.00	\$8,082.00
Nazie Baharloo (Formerly Employed 5+ Year Paralegal)	47.15	\$200.00	\$9,430.00
Stacy Aguirre (Formerly Employed 4+ year Paralegal)	0.33	\$200.00	\$66.00
Daniela Linares (2nd Year Intake Assistant)	38.65	\$150.00	\$5,797.50
Emily Ly (3rd Year Paralegal)	1.67	\$150.00	\$250.50
Henry Michael (1st Year Intern)	0.16	\$150.00	\$24.00
Laura Solorzano (1st Year Intake Assistant)	0.42	\$150.00	\$63.00
Thalia Higgins (Formerly Employed 1st Year Paralegal)	7.83	\$150.00	\$1,174.50
Grand Total	192.07		\$54,983.50

EXHIBIT B

THE SPIVAK LAW FIRM COSTS FAUSTINOS

Date	Type of Expense	Description/Invoice#	Amount
6/15/23	Postage	23.06.15 Invoice_7994538_ev pres lt	\$1.80
7/26/23	LWDA Filing Fee	23.07.26 LWDA Receipt ORD-000244063	\$75.00
7/27/23	Postage	23.07.27 LetterStream 8192202_invoice	\$17.05
7/28/23	Postage	23.07.28 Invoice_8201989	\$1.23
8/1/23	Lexis or Westlaw	Westlaw usage July 2023	\$24.27
8/2/23	Attorney Service-Filing	23.08.02 OLC ENVELOPE # 23LA01162214	\$1,491.17
8/3/23	Attorney Service-Filing	23.08.02 OLC ENVELOPE # 23LA01164254	\$13.12
8/31/23	Attorney Service-Filing	23.08.31 OLC ENVELOPE # 23LA01341476	\$13.12
9/1/23	Lexis or Westlaw	Westlaw usage Aug 2023	\$1.16
9/1/23	Lexis or Westlaw	Lexis usage Aug 2023	\$3.50
9/14/23	Attorney Service-Service	23.09.14 OL Credit Card Sale_05321062 (23.08.25 SOP)	\$164.72
10/2/23	Lexis or Westlaw	Lexis Usages September 2023	\$4.68
10/20/23	Attorney Service-Filing	OLC Envelope 23LA01639161	\$167.62
10/23/23	Attorney Service-Filing	23.10.23 OLC Envelope 23LA01646572	\$13.12
10/24/23	Attorney Service-Filing	23.10.24 OCL Invoice # 8628	\$18.95
11/1/23	Lexis or Westlaw	Lexis Usage October 2023	\$5.25
11/5/23	Electronic Service Provider	23.11.05 Case Anywhere Invoice #306015	\$31.11
12/1/23	Lexis or Westlaw	Lexis Usages November 2023	\$6.32
1/9/24	Attorney Service-Filing	24.01.09 Online Legal Courier Receipt	\$13.12
1/9/24	Lexis or Westlaw	Lexis usage Dec 2023	\$7.06
1/10/24	Attorney Service-Filing	24.01.10 OLC Invoice # 9175	\$19.95
1/18/24	Records Requests	24.01.18 LOS ANGELES SUPERIOR COURT RECEIPT # PA-2024-258131294	\$5.00
1/18/24	Records Requests	24.01.18 LOS ANGELES SUPERIOR COURT RECEIPT #PA-2518131294	\$5.00
2/1/24	Lexis or Westlaw	Westlaw usage Jan 2024	\$7.07
2/5/24	Electronic Service Provider	24.02.05 CASENAYWHERE INVOICE#315831	\$183.00
3/7/24	Lexis or Westlaw	Lexis Usages Feb 2024	\$5.54
3/22/24	Court Reporter	24.03.22 ESQUIRE INVOICE #2744462	\$368.75
4/2/24	Lexis or Westlaw	Lexis usage Mar 2024	\$5.57
5/2/24	Lexis or Westlaw	Lexis Usage April 2024	\$5.68
5/2/24	Electronic Service Provider	24.05.02 CaseAnywhere Invoice #326152	\$165.00
6/6/24	Lexis or Westlaw	Lexis usage May 2024	\$9.96
7/18/24	Lexis or Westlaw	Lexis usage June 2024	\$12.80

THE SPIVAK LAW FIRM COSTS FAUSTINOS

Date	Type of Expense	Description/Invoice#	Amount
8/3/24	Attorney Service-Filing	24.08.03 Case_Anywhere_Invoice_337100	\$147.00
8/7/24	Lexis or Westlaw	Lexis usage July 2024	\$11.70
9/10/24	Lexis or Westlaw	Lexis usage August 2024	\$14.22
10/28/24	Lexis or Westlaw	SEPT 2024 Lexis Usage	\$11.70
11/5/24	Electronic Service Provider	24.11.05 Case_Anywhere_Invoice_348671	\$147.00
11/7/24	Lexis or Westlaw	OCT 2024 Lexis Usage	\$11.68
11/22/24	Expert or Data Analysis	iBridge Invoice #8380	\$100.00
1/17/25	Lexis or Westlaw	Lexis usage Nov 2024	\$10.31
1/22/25	Lexis or Westlaw	December 2024 Lexis Usage	\$5.67
2/4/25	Lexis or Westlaw	Lexis usage Jan 2025	\$11.81
2/4/25	Lexis or Westlaw	Lexis usage Jan 2025	\$11.81
2/5/25	Electronic Service Provider	Case Anywhere Invoice #360466	\$147.00
2/26/25	Mediator Fees	Judicate West #656007	\$2,917.50
3/5/25	Lexis or Westlaw	Lexis usage Feb 2025	\$8.97
3/5/25	Lexis or Westlaw	Lexis usage Feb 2025	\$0.58
3/5/25	Electronic Service Provider	Case Anywhere Invoice #370788	\$49.00
4/4/25	Electronic Service Provider	Case Anywhere Invoice #383145	\$49.00
4/7/25	Lexis or Westlaw	Lexis usage Mar 2025	\$11.61
5/2/25	Electronic Service Provider	Case Anywhere Invoice #395097	\$49.00
5/20/25	Lexis or Westlaw	Lexis usage April 2025	\$10.71
6/2/25	Electronic Service Provider	Case Anywhere Invoice #407104	\$49.00
6/9/25	Lexis or Westlaw	Lexis usage May 2025	\$10.48
7/1/25	Attorney Service-Filing	25.07.01 Case_Anywhere_Invoice_419377	\$49.00
7/8/25	Lexis or Westlaw	Lexis usage June 2025	\$10.80
8/4/25	Electronic Service Provider	CaseAnywhere Invoice ##431937	\$49.00
8/6/25	Lexis or Westlaw	Lexis Usage July 2025	\$7.41
9/2/25	Electronic Service Provider	Case Anywhere Invoice ##444395	\$49.00
9/15/25	Lexis or Westlaw	Lexis Usage Aug 2025	\$8.93
9/15/25	Lexis or Westlaw	Lexis Usage Aug 2025	\$0.14
10/1/25	Electronic Service Provider	Case Anywhere Invoice #457060	\$49.00
10/2/25	Attorney Service-Filing	OLC Envelope No: 25LA01905509	\$15.67
10/6/25	Attorney Service-Filing	OLC Invoice #12842	\$19.95

THE SPIVAK LAW FIRM COSTS FAUSTINOS

Date	Type of Expense	Description/Invoice#	Amount
10/7/25	Lexis or Westlaw	Lexis Usage September 2025	\$5.14
11/4/25	Lexis or Westlaw	Lexis Usage October 2025	\$9.95
11/4/25	Electronic Service Provider	Case Anywhere Invoice #469939	\$55.00
12/3/25	Lexis or Westlaw	Lexis usage Nov 2025	\$8.62
1/2/26	Lexis or Westlaw	Lexis Usage December 2025	\$11.21
1/2/26	Electronic Service Provider	Case Anywhere Invoice #495783	\$49.00
2/2/26	Electronic Service Provider	Case Anywhere Invoice #508978	\$49.00
TBD	Attorney Service-Filing	Estimated Attorney Service charges for e-filing joint status report and courtesy copy delivery	\$ 40.62
TBD	Attorney Service-Filing	Estimated Attorney Service charges for e-filing request for dismissal and courtesy copy delivery	\$ 40.62
TBD	Attorney Service-Filing	Estimated charges for e-service provider	\$ 124.00
		TSLF CURRENT COSTS THROUGH 02/04/2026	\$7,099.26
		TSLF ESTIMATED FUTURE COSTS	\$ 205.24
		TOTAL APPROX COSTS THROUGH FINAL ACCOUNTING	\$ 7,304.50