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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

LOUIS NORIEGA and THERESA MOORE,
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiffs,

vs.

QVC, INC., a Corporation; and DOES 1
through 50, inclusive,

Case No.: **CIVSB2319032**

**DECLARATION OF KYLE
NORDREHAUG IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Assigned for all Purposes to:
Hon. Jessica Morgan
Dept. S-26

Hearing Date: May 28, 2025
Hearing Time: 8:30 a.m.

Action Filed: August 9, 2023
Trial Date: Not set

I, Kyle Nordrehaug, declare:

1 1. I am a partner of the law firm of Blumenthal Nordrehaug Bhowmik De Blouw
2 LLP (“BNBD”), counsel for Plaintiffs Louis Noriega and Theresa Moore (“Plaintiffs”). As such,
3 I am fully familiar with the facts, pleadings and history of this matter. The following facts are
4 within my own personal knowledge, and if called as a witness, I could testify competently to
5 the matters stated herein.

6 2. This declaration is being submitted in support of the Plaintiffs’ Motion for Final
7 Approval of Class Settlement. The settlement reached between Plaintiffs, individually and on
8 behalf of all members of the Class, on the one hand, and Defendant QVC, Inc. (“QVC” or
9 “Defendant”), on the other hand, is set forth in the Joint Stipulation of Class Action and PAGA
10 Settlement (“Agreement”).

11
12 Experience of BNBD

13 3. Over the course of the litigation, my firm has worked actively on this matter. The
14 firm credentials are reflected in the BNBD Resume, a true and correct copy of which is attached
15 hereto as Exhibit #1. Some of the major cases our firm has undertaken are also set forth therein.
16 BNBD has represented hundreds of thousands of employees in hundreds of legal matters,
17 including PAGA lawsuits and hundreds of employment class actions. BNBD’s practice is
18 devoted almost entirely to the prosecution of wage and hour class action and PAGA action
19 matters. The attorneys at BNBD have been appointed lead counsel in hundreds of contested
20 motions for class certification including many consolidated wage and hour matters. The
21 attorneys at my firm have extensive experience in cases involving labor code violations and
22 overtime claims. BNBD has litigated similar overtime cases against other employers on behalf
23 of employees, including cases against Walmart, Legoland, Sharp Healthcare, Securitas, Okta,
24 See’s Candies, Walt Disney Resorts, El Pollo Loco, Panda Express, Universal Protection,
25 Mattress Firm, Total Renal, Liberty Mutual, Union Bank, Apple, Coventry Health Care,
26 Qualxserv, Union Bank, Marriott, Kaiser / Permanente, Walgreens, and California State
27 Automobile Association. My firm has been approved as class counsel by state and federal
28 courts in California in contested class certification motions, including approvals in this Court.

1 It is this level of experience which enabled the firm to undertake the instant matter and to
2 successfully combat the resources of the defendants and their capable and experienced counsel.
3 On account of the concerted and dedicated effort this case demanded in order to properly handle
4 and prosecute, BNBD was precluded from taking other cases, and in fact, had to turn away
5 other potential fee generating cases.

6 4. Blumenthal Nordrehaug Bhowmik De Blouw LLP was responsible for handling
7 the briefing and argument that resulted in the landmark ruling of *Sakkab v. Luxottica Retail N.*
8 *Am., Inc.*, 803 F.3d 425 (9th Cir. 2015). There, Blumenthal Nordrehaug Bhowmik De Blouw
9 LLP overcame opposition by Littler Mendelson and amici Curiae briefs submitted by Mayer
10 Brown LLP to persuade the Ninth Circuit of the importance of the substantive rights of the
11 State of California under the California Private Attorney General Act of 2004 ("PAGA").
12 BNBD took the lead on this case where the ruling was the reaffirmation of the PAGA statute
13 and the *Iskanian* rule. BNBD also has recently engaged in noted appellate work on the subject
14 of class actions in the California Court of Appeals resulting in the opinions handed down in
15 *Securitas Sec. Services USA, Inc. v. Superior Court*, 234 Cal. App. 4th 1109, 184 Cal. Rptr. 3d
16 568 (2015) (class or representative action waiver in an employment-related arbitration
17 agreement was unenforceable); *Altman v. Solarcity Corp.*, No. D067582, 2016 Cal. App.
18 Unpub. LEXIS 3536 (Ct. App. May 13, 2016) (same). In 2015, Blumenthal Nordrehaug
19 Bhowmik De Blouw LLP received an award from the Daily Journal for Top Appellate Reversal,
20 and I received an award from the Daily Journal as Top Labor & Employment Attorney in 2016.

21 5. District Judge Irma Gonzales in a consolidated class action representing
22 hundreds of armed forces officers held that Blumenthal Nordrehaug Bhowmik De Blouw LLP
23 was "qualified counsel with extensive experience in class action litigation." *McPhail v. First*
24 *Command Fin. Planning, Inc.*, 247 F.R.D. 598, 611 (S.D. Cal. 2007). Examples of other
25 contested actions where class certification was granted Blumenthal Nordrehaug Bhowmik De
26 Blouw LLP and was appointed lead class counsel in wage and hour class actions in Federal
27 Court include *Schulz v. Qualxserv, LLC*, 2012 U.S. Dist. LEXIS 58561 (S.D. Cal. 2012);
28 *Dobrosky v. Arthur J. Gallagher Serv. Co., LLC*, No. EDCV 13-0646 JGB (SPx), 2014 U.S.

1 Dist. LEXIS 106345 (C.D. Cal. July 30, 2014); *Culley v. Lincare Inc.*, No. 2:15-cv-00081-
2 MCE-CMK, 2016 U.S. Dist. LEXIS 105704 (E.D. Cal. Aug. 10, 2016); *Nelson v. Avon Prods.*,
3 No. 13-cv-02276-BLF, 2015 U.S. Dist. LEXIS 51104 (N.D. Cal. Apr. 17, 2015); *Orozco v.*
4 *Illinois Tool Works*, U.S.D.C. Case No. 14-cv-02113-MCE, 2016 U.S. Dist. LEXIS 158115
5 (E.D. Cal. February 17, 2017); *Metrow v. Liberty Mutual*, U.S.D.C. Case No. EDCV 16-1133
6 JGB (C.D. Cal. May 1, 2017). Some examples of heavily contested State Court wage and hour
7 class actions where class certification was obtained and BNBD was appointed lead class
8 counsel include *El Pollo Loco Wage and Hour Cases*, Orange County Superior Court, JCCP
9 Case No. 4957 (July 30, 2018); *Torrento v. Lucile Packard Children's Hospital*, Santa Clara
10 County Superior Court Case No. 2016-1-CV-291035 (July 17, 2018); *Salem v. Alliance*, San
11 Bernardino Superior Court, Case No. CIVRS1401129 (March 8, 2016); *Rivers v. Veolia*,
12 Sonoma County Superior Court Case No. SCV 255350 (March 9, 2016); *Mathies v. Union*
13 *Bank*, San Francisco Superior Court Case No. CGC-10-498077 (Sept. 11, 2013); *Jefferson v.*
14 *Bottling Co, LLC*, Orange County Superior Court Case No. 30-2009-00180102-CU-OE-CXC
15 (Sept. 7, 2010); *Rangel v. Balboa Ambulance Co.*, 37-2008-00095700-CU-BT-CTL (Fe. 11,
16 2010); *Tan v. CSAA*, Orange County Superior Court, Case No. 30-2008-00231219 (Nov. 23,
17 2009).

18
19 The Settlement Is Fair, Reasonable and Adequate:

20 6. Plaintiff Noriega worked for Defendant as a Fulfillment Center Team Member in
21 Ontario from September 15, 2022 to December 14, 2022. On March 15, 2023, Plaintiff Noriega
22 filed with the LWDA and served on Defendant a notice under Labor Code section 2699.3,
23 stating that Plaintiff Noriega intended to serve as a proxy of the LWDA to recover civil
24 penalties on behalf of Aggrieved Employees for alleged Labor Code violations (the “PAGA
25 Notice”). A true and correct copy of the PAGA Notice by Plaintiff Noriega was submitted as
26 an exhibit to my declaration in support of the motion for preliminary approval. The PAGA
27 Notice alleged violations of California Labor Code §§ 201, 202, 203, 204 et seq., 210, 218,
28 221, 226(a), 226.7, 227.3, 246, 510, 512, 558(a)(1)(2), 1194, 1197, 1197.1, 1198, 2802,

1 California Code of Regulations, Title 8, Section 11040, Subdivision 5(A)-(B), California Code
2 of Regulations, Title 8, Section 1 1070(14) (Failure to Provide Seating), and violation of the
3 applicable Industrial Welfare Commission Wage Order(s), and attached a copy of the complaint
4 by Plaintiff Noreiga as an exhibit to the PAGA Notice.

5 7. On August 9, 2023, plaintiff Louis Noriega filed a complaint against Defendant in
6 the Superior Court of the State of California, County of San Bernardino (“Noriega Action”). Plaintiff
7 Noriega’s complaint sought civil penalties pursuant to PAGA for alleged violations of the California
8 Labor Code. Plaintiffs also filed a First Amended Complaint in the Noriega matter that added Ms.
9 Moore as a party-plaintiff and further added class allegations consistent with claims alleged in the
10 two initial complaints and related PAGA notice letters. The First Amended Complaint was filed on
11 or about October 14, 2024 and is the operative complaint in the Actions (the “Operative
12 Complaint”).

13 8. The Parties engaged David Rotman, Esq., a respected mediator with extensive wage
14 and hour class action experience and, in May 2024, participated in a full day mediation with Mr.
15 Rotman. Throughout the day, the arms-length negotiations were hard-fought and adversarial as the
16 Parties exchanged extensive information on their legal and factual positions and made numerous
17 offers and counter-offers. Near the end of the day, the Parties reached agreement on all major issues.

18 9. In this case, the Settlement reached in the total non-reversionary amount of One
19 million Five Hundred Thousand Dollars and Zero Cents (\$1,500,000.00) as the Gross
20 Settlement Amount is the product of substantial effort by the Parties and counsel should be
21 approved as fair, reasonable and adequate. The Settlement was the result of arms-length
22 negotiations during mediation and between experienced counsel. The Settlement was only
23 reached after extensive factual and legal investigation and research, careful evaluation of the
24 respective parties' strengths and weaknesses, and diligent negotiation efforts. The Settlement
25 amount is a negotiated compromise which took into account risks related to liability, damages,
26 and all the defenses asserted by Defendant. The risk that class certification would not be
27 granted was an extremely important consideration, as the denial of class certification would
28

1 mean that the class would receive nothing. The fear of retaliation and blacklisting makes it
2 unlikely that absent class certification, individuals would come forward to assert their rights
3 individually. Although I am of the opinion that a class can be certified, I also believe in the
4 fairness of the settlement that is based on factoring in the uncertainty and risks to Plaintiff
5 involved in not prevailing on one or more of the causes of action or theories alleged, the
6 possibility of non-certification and potential for appeals. Based on the foregoing data and our
7 own independent investigation and evaluation, I am of the opinion that the settlement with the
8 Defendants for the consideration and on the terms set forth in the Agreement is fair, reasonable,
9 and adequate and is in the best interest of the class in light of all known facts and circumstances,
10 including the risk of significant delay, the defenses asserted by Defendant, and numerous
11 potential appellate issues.

12 10. From the inception of the case, Class Counsel has zealously represented the
13 interests of the Class. The settlement was obtained for the benefit of the Class, as opposed to
14 the individual Plaintiffs. Class Counsel have been approved as class counsel in a number of
15 prior cases, have litigated numerous other class action cases, and are competent to represent
16 the Class. Plaintiffs and Plaintiffs' counsel are adequate representatives in that they have no
17 conflicts with the Class and have and will adequately represent the Class.

18
19 Lodestar and Expenses:

20 11. From February 1, 2023 to April 29, 2025, my firm worked more than 227 hours
21 prosecuting these class claims with the attorneys' hourly fee rates for attorneys ranging from
22 \$475 to \$950, which resulted in lodestar for BNBD relating to the class claims for this period
23 in the amount of \$171,201.25. In addition, there will be additional work performed to complete
24 the settlement process. Attached hereto as Exhibit #2 is a true and correct copy of the BNBD
25 billing statement for this matter which sets forth the specific tasks, time and attorney for the
26 work performed on this matter.

27 12. The rates charged by my firm are in line with the prevailing rates of attorneys in
28 the local legal community for similar work and, if this were a commercial matter, these are the

1 charges that would be made and presented to the client. My firm's hourly rates are based upon
2 the Laffey Matrix with the appropriate 2% increase adjustment for Southern California. A true
3 and correct copy of the current Laffey Matrix is attached hereto as Exhibit #3. These hourly
4 rates have been approved by Court's throughout California, including the Courts in the Superior
5 Court of California. In fact, on August 1, 2018, District Judge Andre Birotte Jr. explicitly found
6 that BNBD's "rates generally appear reasonable and 'in line with those prevailing in the
7 [relevant] community'—the Central District of California". Finally, the reasonableness of
8 BNBD's hourly rates is further confirmed by comparing such rates with the rates of comparable
9 counsel practicing complex and class litigation as detailed in the National Law Journal Billing
10 Survey. See e.g. *Zest IP Holdings, LLC v. Implant Direct MFG., LLC*, 2014 U.S. Dist. LEXIS
11 167563 (S.D. Cal. 2014) (finding that "Mayer Brown's \$775 average billing rate for partners"
12 and "Mayer Brown's \$543 average associate billing rate" are reasonable rates when compared
13 within 21 other firms practicing in the Southern District of California.) This survey is useful
14 to show that BNBD's rates are in line with the comparable rates of the defense counsel that
15 opposes these types of class claims, such as Mayer Brown noted above who is defense counsel
16 in cases currently being prosecuted by BNBD. In another example, Sheppard Mullin Richter &
17 Hampton, who is opposing counsel in many cases prosecuted by BNBD, charges rates as high
18 as \$875 for partners and \$535 for associates. Similarly, Paul Hastings, another opposing
19 counsel in these types of cases, charges between \$900 and \$750 for partners and \$755 and \$335
20 for associates. Thus, the rates charged by BNBD for comparable work are less than these
21 examples, and are therefore undoubtedly reasonable.

22 13. The reasonableness of the requested award is also established by reference to
23 similar awards in other wage and hour cases. The following are examples of similar recent fee
24 awards. On January 31, 2020, in *El Pollo Loco Wage and Hour Cases* (Orange County Superior
25 Court Case No. JCCP 4957) Judge William Claster awarded Class Counsel a one-third award
26 in a wage and hour class settlement. On February 11, 2020, in *Singh v. Total Renal Care* (San
27 Francisco Superior Court Case No. CGC-16-550847) Judge Ethan Schulman awarded Class
28 Counsel a one-third award in a wage and hour class settlement. On June 2, 2021, in *Pacia v.*

1 *CIM Group, L.P.* (Los Angeles Superior Court Case No. BC709666), Judge Amy D. Hogue
2 awarded Class Counsel a one-third fee award in a wage and hour class settlement. On
3 November 8, 2021, in *Securitas Wage and Hour Cases* (Los Angeles Superior Court Case No.
4 JCCP4837) Judge David Cunningham awarded a one-third fee award in a wage and hour class
5 settlement. On November 17, 2021, in *Leon v. Sierra Aluminum Company* (San Bernardino
6 Superior Court Case No. CIVDS2010856) Judge David Cohn awarded a one-third fee award in
7 a wage and hour class settlement. On March 17, 2022, in *See's Candies Wage and Hour Cases*
8 (Los Angeles Superior Court Case No. JCCP5004) Judge Maren Nelson awarded a one-third
9 fee award in a wage and hour class action settlement. On April 12, 2022, in *O'Donnell v. Okta,*
10 *Inc.*, (San Francisco Superior Court Case No. CGC-20-587665) Judge Richard Ulmer awarded
11 a one-third fee award in a wage and hour class action settlement. On June 30, 2022, in
12 *Armstrong, et al. v. Prometric LLC* (Los Angeles Superior Court Case No. 20STCV29967),
13 Judge Maren E. Nelson awarded a one-third fee award in a wage and hour class action. On July
14 13, 2022, in *Crum v. S&D Carwash Management LLC*, (Sacramento Superior Court Case No.
15 2019-00251338), Judge Christopher E. Krueger awarded a one-third fee award in a wage and
16 hour class action settlement. On September 7, 2022, in *Lucchese, et al. v. Kone, Inc.*, (San
17 Francisco Superior Court Case No. CGC-20-588225), Judge Richard B. Ulmer, Jr. awarded a
18 one-third fee award in a wage and hour class action settlement. On November 4, 2022, in
19 *Infinity Energy Wage and Hour Cases* (San Diego Superior Court, Case No. JCCP5139), Judge
20 Keri Katz awarded a one-third fee award in a wage and hour class action settlement. On
21 February 1, 2023, in *Hogan v. AECOM Technical Services, Inc.* (Los Angeles Superior Court
22 Case No. 19STCV40072), Judge Stuart Rice awarded a one-third fee award in a wage and hour
23 class settlement. On February 28, 2023, in *Farthing v. Milestone Technologies* (San Francisco
24 Superior Court Case No. CGC-21-591251), Judge Richard B. Ulmer, Jr. awarded a one-third
25 fee award in a wage and hour class action settlement. On March 2, 2023, in *Leon v. Calaveras*
26 *Materials* (Kings County Superior Court Case No. 21C-0105), Judge Melissa D'Morias
27 awarded a one-third fee award in a wage and hour class settlement. On June 20, 2023, in
28 *Gonzalez v. Pacific Western Bank* (San Bernardino County Superior Court Case No.

1 CIVSB2127657) Judge David Cohn awarded a one-third fee award in a wage and hour class
2 settlement, On June 30, 2023, in *Aguirre v. Headlands Ventures* (Sacramento County Superior
3 Court Case No. 34-2021-00297290), Judge Jill Talley approved a one-third fee award in a wage
4 and hour class settlement. On August 5, 2023, in *Correia v. Gallo Glass Company* (Stanislaus
5 County Superior Court Case No. CV-21-006459) Judge Sonny Sandhu approved a one-third
6 fee award in a wage and hour class settlement. On September 15, 2023, in *Moran v. Sharp*
7 *Healthcare* (San Diego County Superior Court Case No. 37-2019-00050203), Judge Richard
8 Whitney awarded a one-third fee award in a wage and hour class settlement. On October 10,
9 2023, in *Arango v. Schlumberger Technology*, (Orange County Case No. 30-2019-01056839-
10 CU- OE-CXC), Judge William Claster approved a one-third fee award in a wage and hour class
11 action. On October 16, 2023, in *Flores v. Walmart*, (San Bernardino County Superior Court
12 Case No. CIVDS2023061) Judge Joseph T. Ortiz awarded a one-third fee award in a wage and
13 hour class settlement. On October 20, 2023, in *Pond v. Glen Ivy Hot Springs* (Riverside County
14 Superior Court Case No. CVRI2104986), Judge Harold W. Hopp awarded a one-third fee award
15 in a wage and hour class settlement. On November 17, 2023, in *Silva v. Woodward HRT* (Los
16 Angeles County Superior Court Case No. 21STCV42692), Judge Maren Nelson awarded a one-
17 third fee award in a wage and hour class settlement. On November 20, 2023, in *Steele v.*
18 *Legoland California* (San Diego County Superior Court Case No. 37-2021-00052868), Judge
19 Carolyn M. Caietti awarded a one-third fee award in a wage and hour class settlement. On
20 November 29, 2023, in *Ochoa-Andrade v. See's Candies* (San Mateo County Superior Court
21 Case no. 22-CIV-02481), Judge Marie Weiner approved a one-third fee award in a wage and
22 hour class settlement. On September 12, 2024, in *Murdock v. Aspen Surgery Center* (Contra
23 Costa County Superior Court Case No. MSC21-02047), Judge Charles Treat approved a one-
24 third fee award in a wage and hour class settlement. On October 8, 2024, in *Rattler v. Pacific*
25 *Coast Container* (Alameda Superior Court Case No. 22CV015216), Judge Michael Markman
26 approved a one-third fee award in a wage and hour class settlement. On January 14, 2025, in
27 *Curry v. United Health Care Staffing* (San Francisco Superior Court Case No. CGC-21-
28 597339), Judge Curtis Karnow approved a one-third fee award in a wage and hour class

1 settlement. On January 17, 2025, in *Virgen v. Curaleaf* (Sacramento County Superior Court
2 Case No. 34-2022-00314655), Judge Lauri Damrell approved a one-third fee award in a wage
3 and hour class settlement. On February 7, 2025, in *Wong v. Nurse Logistics* (Santa Clara County
4 Superior Court Case No. 22CV408939), Judge Theodore Zayner approved a one-third fee
5 award in a wage and hour class settlement. A fee award equal to one-third of the common fund
6 is therefore reasonable in light of the fees that have been awarded in other similar cases.

7 14. To date, BNBD has incurred litigation expenses of \$19,330.68. These litigation
8 expenses include the expenses incurred for filing fees, attorney service charges (Knox and One
9 Legal), mediation fee charges, and delivery charges, all of which are costs normally billed to
10 and paid by the client. These costs were reasonably incurred by BNBD in the prosecution of
11 this matter and are set forth in the BNBD billing records attached hereto as Exhibit #2.

12
13 Service Awards:

14 15. I respectfully request that for their service as the class representatives, Plaintiffs
15 should be awarded the agreed service awards of \$10,000 each, in accordance with the
16 Settlement Agreement for their time, risk and effort expended on behalf of the Class as the
17 class representatives. Defendant has agreed to this payment and there have been no objections
18 to the requested service award. As the representatives of the Class, Plaintiffs performed their
19 duty to the Class admirably and without exception. Plaintiffs worked extensively with Class
20 Counsel during the course of the litigation, responding to numerous requests, searching for
21 documents, working with counsel, committing to responding to discovery and depositions, and
22 reviewing the settlement documentation. As set forth in the Agreement, Plaintiffs are also
23 providing a comprehensive release as part of the Settlement, far beyond the class release. The
24 Declarations of Plaintiffs, attached hereto, detail the involvement, stress and risks they
25 undertook as a result of this Action. The Plaintiffs also assumed the serious risk that they might
26 possibly be liable for costs and fees to Defendant, as well as the reputational risk of being
27 “blacklisted” by other future employers for having filed a class action on behalf of fellow
28 former employees. Without the Plaintiffs’ participation, cooperation and information, no other

1 fellow employees would be receiving any benefit. The payment of service awards to successful
2 class representatives is appropriate and the amount of \$15,000 each is well within the currently
3 awarded range for similar settlements. The requested award is also reasonable by reference to
4 the amounts that other California courts have found to be reasonable in wage and hour class
5 action settlements: *See, e.g., Andrews v. Plains All Am. Pipeline L.P.*, 2022 U.S. Dist. LEXIS
6 172183, at *11 (C.D. Cal. 2022) (service awards of \$15,000 each are appropriate); *Zamora v.*
7 *Balboa Life & Casualty, LLC*, Case No. BC360036, Los Angeles County Superior Court (Mar.
8 7, 2013)(awarding \$25,000 service award); *Aguiar v. Cingular Wireless, LLC*, Case No. CV
9 06-8197 DDP (AJWx)(C.D. Cal. Mar. 17, 2011)(awarding \$14,767 service award); *Magee v.*
10 *American Residential Services, LLC*, Case No. BC423798, Los Angeles County Superior Court
11 (Apr. 21, 2011)(awarding \$15,000 service award); *Mares v. BFS Retail & Commercial*
12 *Operations, LLC*, Case No. BC375967, Los Angeles County Superior Court (June 24,
13 2010)(awarding \$15,000 service award).

14
15 I declare under the penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed this 2nd day of May, 2025, at San Diego, California.

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Blumenthal Nordrehaug Bhowmik De Blouw LLP

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FIRM RESUME

Areas of Practice: Employee, Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation, Business Litigation.

ATTORNEY BIOGRAPHIES

Norman B. Blumenthal

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Action, Civil Litigation, Wage and Hour Class Actions, Transactional Law

Admitted: 1973, Illinois; 1976, California

Biography: Law Clerk to Justice Thomas J. Moran, Illinois Supreme Court, 1973-1975, while on Illinois Court of Appeals. Instructor, Oil and Gas Law: California Western School of Law, 1981; University of San Diego School of Law, 1983. Sole Practitioner 1976-1987. Partner, Blumenthal & Ostroff, 1988-1995. Partner, Blumenthal, Ostroff & Markham, 1995-2001. Partner, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2018. Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP, 2018 - present.

Member: San Diego County, Illinois State and American Bar Associations; State Bar of California.

Educated: University of Wisconsin (B.A., 1970); Loyola University of Chicago (J.D., 1973);

Summer Intern (1971) with Harvard Voluntary Defenders

Kyle R. Nordrehaug

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Consumer and Securities Class Actions, Wage and Hour Class Actions, Civil Litigation

Admitted: 1999, California

Biography: Associate, Blumenthal, Ostroff & Markham, 1999-2001. Associate, Blumenthal & Markham, 2001-2007. Partner, Blumenthal & Nordrehaug, 2007. Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Member: State Bar of California, Ninth Circuit Court of Appeals, Third Circuit Court of Appeals

Educated: University of California at Berkeley (B.A., 1994); University of San Diego School of Law (J.D. 1999)

Awards: Top Labor & Employment Attorney 2016; Top Appellate Reversal - Daily Journal 2015; Super Lawyer 2015-2018

Aparajit Bhowmik

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2006, California

Educated: University of California at San Diego (B.A., 2002); University of San Diego School of Law (J.D. 2006)

Biography: Partner, Blumenthal, Nordrehaug & Bhowmik, 2008-2017

Awards: Rising Star 2015

Nicholas J. De Blouw

Partner, Blumenthal Nordrehaug Bhowmik De Blouw LLP (2018 to present)

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2011, California

Educated: Wayne State University (B.A. 2008); California Western School of Law (J.D. 2011)

Piya Mukherjee

Associate Attorney

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2010, California

Educated: University of California, San Diego (B.S. 2006); University of Southern California, Gould School of Law (J.D. 2010)

Victoria Rivapalacio

Associate Attorney

Practice Areas: Civil Litigation; Consumer Class Actions, Wage and Hour Class Actions

Admitted: 2011, California

Educated: University of California at San Diego (B.A., 2003); George Washington University Law School (J.D. 2010)

Ricardo Ehmman

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2018, California; 2004, Nevada

Educated: University of California, San Diego (B.A. 1998); Loyola Law School (J.D. 2001)

Jeffrey S. Herman

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2011, California; 2016 Arizona

Educated: University of Michigan (B.A. 2008); California Western School of Law (J.D. 2011)

Charlotte James

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

Educated: San Diego State University; California Western School of Law

Christine Levu

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2012, California

Educated: University of California, Irvine; California Western School of Law

Andrew Ronan

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2016, California

Educated: Arizona State University; University of San Diego School of Law

Scott Blumenthal

Associate Attorney

Practice Areas: Civil Litigation; Wage and Hour Class Actions

Admitted: 2020, New Mexico

Educated: University of Southern California; California Western School of Law

Sergio Julian Puche

Associate Attorney

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REPORTED CASES

Sakkab v. Luxottica Retail N. Am., Inc., 803 F.3d 425 (9th Cir. 2015) (The panel reversed the district court's order granting Luxottica Retail North America, Inc.'s motion to compel arbitration of claims and dismissing plaintiff's first amended complaint, in a putative class action raising class employment-related claims and a non-class representative claim for civil penalties under the Private Attorney General Act.);

Securitas Security Services USA, Inc. v. Superior Court, 234 Cal. App. 4th 1109 (Cal. Feb. 27, 2015) (Court of Appeal concluded the trial court correctly ruled that *Iskanian* rendered the PAGA waiver within the parties' dispute resolution agreement unenforceable. However, the Court of Appeal then ruled the trial court erred by failing to invalidate the non-severable class action waiver from the agreement and remanded the entire complaint, including class action and PAGA claims, be litigated in the Superior Court);

Sussex v. United States Dist. Court for the Dist. of Nev., 781 F.3d 1065 (9th Cir. 2015) (The panel determined that the district court clearly erred in holding that its decision to intervene mid-arbitration was justified under *Aerojet-General*. Specifically, the panel held that the district court erred in predicting that an award issued by the arbitrator would likely be vacated because of his "evident partiality" under 9 U.S.C. § 10(a)(2).);

Provost v. YourMechanic, Inc., 2020 Cal. App. Lexis 955 (Oct. 15, 2020) (Court of Appeals affirmed denial of arbitration of PAGA claim, and held in a case of first impression, that there was no additional standing rules for PAGA claim brought by independent contractor);

In re Tobacco Cases II, 41 Cal. 4th 1257 (2007); Washington Mutual Bank v. Superior Court, 24 Cal. 4th 906 (2001); Rocker v. KPMG LLP, 148 P.3d 703; 122 Nev. 1185 (2006); PCO, Inc. v. Christensen, Miller, Fink, Jacobs, Glaser, Weil & Shapiro, LLP, 150 Cal. App. 4th 384 (2007); Hall v. County of Los Angeles, 148 Cal. App. 4th 318 (2007); Coshov v. City of Escondido, 132 Cal. App. 4th 687 (2005); Daniels v. Philip Morris, 18 F.Supp 2d 1110 (S.D. Cal.1998); Gibson v. World Savings & Loan Asso., 103 Cal. App. 4th 1291 (2003); Jordan v. Department of Motor Vehicles,

75 Cal. App. 4th 445 (1999); Jordan v. Department of Motor Vehicles, 100 Cal.App. 4th 431 (2002); Norwest Mortgage, Inc. v. Superior Court, 72 Cal.App.4th 214 (1999); Hildago v. Diversified Transp. Sya, 1998 U.S. App. LEXIS 3207 (9th Cir. 1998); Kensington Capital Mgal. v. Oakley, Inc., 1999 U.S. Dist LEXIS 385; Fed.Sec.L.Rep. (CCH) P90, 411 (1999 C.D. Cal.); Lister v. Oakley, Inc., 1999 U.S. Dist. LEXIS 384; Fed. Sec. L. Rep. (CCH) P90,409 (C.D. Cal. 1999); Olszewski v. Scripps Health, 30 Cal. 4th 798 (2003); Steroid Hormone Product Cases, 181 Cal. App. 4th 145 (2010); Owen v. Macy's, Inc., 175 Cal. App. 4th 462 (2009); Taiheiyo Cement Corp. v. Superior Court, 117 Cal. App. 4th 380 (2004); Taiheiyo Cement Corp. v. Superior Court, 105 Cal.App. 4th 398 (2003); McMeans v. Scripps Health, Inc., 100 Cal. App. 4th 507 (2002); Ramos v. Countrywide Home Loans, 82 Cal.App. 4th 615 (2000); Tevssier v. City of San Diego, 81 Cal.App. 4th 685 (2000); Washington Mutual Bank v. Superior Court, 70 Cal. App. 4th 299 (1999); Silvas v. E*Trade Mortg. Corp., 514 F.3d 1001 (9th Cir. 2008); Silvas v. E*Trade Mortg. Corp., 421 F. Supp. 2d 1315 (S.D. Cal. 2006); McPhail v. First Command Fin. Planning, Inc., 2009 U.S. Dist. LEXIS 26544 (S.D. Cal. 2009); McPhail v. First Command Fin. Planning, Inc., 251 F.R.D. 514 (S.D. Cal. 2008); McPhail v. First Command Fin. Planning, Inc., 247 F.R.D. 598 (S.D. Cal. 2007); Barcia v. Contain-A-Way, Inc., 2009 U.S. Dist. LEXIS 17118 (S.D. Cal. 2009); Barcia v. Contain-A-Way, Inc., 2008 U.S. Dist. LEXIS 27365 (S.D. Cal. 2008); Wise v. Cubic Def. Applications, Inc., 2009 U.S. Dist. LEXIS 11225 (S.D. Cal. 2009); Gabisan v. Pelican Prods., 2009 U.S. Dist. LEXIS 1391 (S.D. Cal. 2009); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin. Nat'l Marine Fisheries Serv., 630 F. Supp. 2d 1222 (S.D. Cal. 2009); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin. Nat'l Marine Fisheries Serv., 2008 U.S. Dist. LEXIS 102380 (S.D. Cal. 2008); Louie v. Kaiser Found. Health Plan, Inc., 2008 U.S. Dist. LEXIS 78314 (S.D. Cal. 2008); Weltman v. Ortho Mattress, Inc., 2010 U.S. Dist. LEXIS 20521 (S.D. Cal. 2010); Weltman v. Ortho Mattress, Inc., 2008 U.S. Dist. LEXIS 60344 (S.D. Cal. 2008); Curry v. CTB McGraw-Hill, LLC, 2006 U.S. Dist. LEXIS 5920; 97 A.F.T.R.2d (RIA) 1888; 37 Employee Benefits Cas. (BNA) 2390 (N.D. Cal. 2006); Reynov v. ADP Claims Servs. Group, 2006 U.S. Dist. LEXIS 94332 (N.D. Cal. 2006); Kennedy v. Natural Balance Pet Foods, Inc., 2010 U.S. App. LEXIS 248 (9th Cir. 2010); Kennedy v. Natural Balance Pet Foods, Inc., 2008 U.S. Dist. LEXIS 38889 (S.D. Cal. 2008); Kennedy v. Natural Balance Pet Foods, Inc., 2007 U.S. Dist. LEXIS 57766 (S.D. Cal. 2007); Sussex v. Turnberry/MGM Grand Towers, LLC, 2009 U.S. Dist. LEXIS 29503 (D. Nev. 2009); Picus v. Wal-Mart Stores, Inc., 256 F.R.D. 651 (D. Nev. 2009); Tull v. Stewart Title of Cal., Inc., 2009 U.S. Dist. LEXIS 14171 (S.D. Cal. 2009); Keshishzadeh v. Gallagher, 2010 U.S. Dist. LEXIS 46805 (S.D. Cal. 2010); Keshishzadeh v. Arthur J. Gallagher Serv. Co., 2010 U.S. Dist. Lexis 116380 (S.D. Cal. 2010); In re Pet Food Prods. Liab. Litig., MDL Docket No. 1850 (All Cases), 2008 U.S. Dist. LEXIS 94603 (D.N.J. 2008); In re Pet Food Prods. Liab. Litig., 629 F.3d 333 (3rd Cir. 2010); Puentes v. Wells Fargo Home Mortgage, Inc., 160 Cal. App. 4th 638 (2008); Rezec v. Sony Pictures Entertainment, Inc., 116 Cal. App. 4th 135 (2004); Badillo v. Am. Tobacco Co., 202 F.R.D. 261 (D. Nev. 2001); La Jolla Friends of the Seals v. Nat'l Oceanic & Atmospheric Admin., 2010 U.S. App. Lexis 23025 (9th Cir. 2010); Dirienzo v. Dunbar Armored, Inc., 2011 U.S. Dist. Lexis 36650 (S.D. Cal. 2011); Rix v. Lockheed Martin Corp., 2011 U.S. Dist Lexis 25422 (S.D. Cal. 2011); Weitzke v. Costar Realty Info., Inc., 2011 U.S. Dist Lexis 20605 (S.D. Cal. 2011); Goodman v. Platinum Condo. Dev., LLC, 2011 U.S. Dist. LEXIS 36044 (D. Nev. 2011); Sussex v. Turnberry/MGM Grand Towers, LLC, 2011 U.S. Dist. LEXIS 14502 (D. Nev. 2011); Smith v. Kaiser Foundation Hospitals, Inc., 2010 U.S. Dist. Lexis 117869 (S.D. Cal. 2010); Dobrosky v. Arthur J. Gallagher Serv. Co., LLC, No. EDCV 13-0646 JGB (SPx), 2014 U.S. Dist. LEXIS 106345 (C.D. Cal. July 30, 2014); Metrow v. Liberty Mut. Managed Care LLC - Class Certification Granted, Metrow v. Liberty Mut. Managed Care LLC, No. EDCV 16-1133 JGB (KKx), 2017 U.S. Dist. LEXIS 73656 (C.D. Cal. May 1, 2017); Nelson v. Avon Products, Inc., Class Certification Granted, U.S. District Court for The Northern District of California, Case No. 13-cv-02276-BLF, 2015 U.S. Dist. LEXIS 51104 (N.D. Cal. Apr. 17, 2015); Orozco v. Illinois Tool Works Inc., Class Certification Granted, 2017 U.S. Dist. LEXIS 23179 (E.D. Cal. Feb. 16, 2017); Rieve v. Coventry Health Care, Summary Judgment *Sua*

Sponte Granted for Plaintiff, Rieve v. Coventry Health Care, Inc., 870 F. Supp. 2d 856 (C.D. Cal. 2012)

CLASS ACTION & REPRESENTATIVE CASES

4G Wireless Wage Cases, Orange County Superior Court, JCCP No. 4736; Classic Party Rentals Wage & Hour Cases, Los Angeles Superior Court, Case No. JCCP No. 4672; Abu-Arafeh v. Norco Delivery Service, Inc., San Francisco County Superior Court, Case No. CGC-14-540601; Aburto v. Verizon, U.S. District Court, Southern District California, Case No. 11-cv-0088; Adkins v. Washington Mutual Bank, Class Certification Granted, San Diego County Superior Court, Case No. GIC819546; Agah v. CompUSA, U.S. District Court, Central District of California, Case No. SA CV05-1087 DOC (Anx); Akers v. The San Diego Union Tribune, San Diego County Superior Court, Case No 37-2010-00088571; Altman v. SolarCity Corporation, San Diego County Superior Court, Case No. 37-2014-00023450-CU-OE-CTL; Aquino v. Macy's West Stores, Orange County Superior Court, Case No. 30-2010-00395420; Baker v. Advanced Disability Management, Inc., Sacramento County Superior Court, Case No. 34-2014-00160711; Barcia v. Contain-A-Way, U.S. District Court, Southern District California, Case No. 07 cv 0938; Bates v. Verengo, Inc., Orange County Superior Court, Case No. 30-2012-00619985-CU-OE-CXC; Battle v. Charming Charlie Inc., San Diego County Superior Court, Case No. 37-2014-00005608; Behar v. Union Bank, Orange County Superior Court, Case No. 30-2009-00317275; Bell v. John Stewart Company, Alameda County Superior Court, Case No. RG14728792; Bennett v. Custom Built Personal Training Monterey County Superior Court, Case No. M127596; Bermant v. Bank of America, Investment Services, Inc., Los Angeles Superior Court, Civil Action No. BC342505; Bethley v. Raytheon Company, United States District Court, Central District of California, Case No. SACV10-01741; Betorina v. Randstad US, L.P., U.S. District Court Northern District of California, Case No. 3:15-cv-03646-MEJ; Beverage v. Edcoa Inc., Sacramento County Superior Court, Case No. 2013-00138279; Bova v. Washington Mutual Bank / JP Morgan Chase, U.S. District Court, Southern District California, Case No. 07-cv-2410; Bowden v. Sunset Parking Services, LLC & LAZ Parking California, LLC - Settled San Diego County Superior Court, Case No. 37-2012-00101751-CU-OE-CTL; Briseno v. American Savings Bank, Class Certification Granted, Orange County Superior Court, Case No. 774773; Brueske v. Welk Resorts, San Diego Superior Court, Case No 37-2010-00086460; Bueche v. Fidelity National Management Services, U.S. District Court, Eastern District of California, Case No. 13-cv-01114; Bunch v. Pinnacle Travel Services, LLC, Los Angeles County Superior Court, Case No. BC552048; Butler v. Stericycle, Inc & Appletree Answering Services of California, Inc., Sacramento County Superior Court, Case No. 34-2015-00180282; Cabral v. Creative Communication Tech., Class Certification Granted, Los Angeles Superior Court, Case No. BC402239; Cardoza v. Wal-Mart Associates, Inc., U.S. District Court Northern District of California, Case No. 4:15-cv-01634-DMR; Castro v. Vivint Solar, Inc., San Diego County Superior Court, Case No. 37-2014-00031385-CU-OE-CTL; Cavazos v. Heartland Automotive Services, Inc., Riverside County Superior Court, Case No. PSC 1401759; Cohen v. Bosch Tool, San Diego Superior Court, Case No. GIC 853562; Comstock v. Washington Mutual Bank - Class Certification Granted, San Diego County Superior Court, Case No. GIC820803; Conley v. Norwest, San Diego County Superior Court, Case No. N73741; Connell v. Sun Microsystems, Alameda Superior Court, Case No. RG06252310; Corrente v. Luxe Valet, Inc., San Francisco County Superior Court, Case No. CGC-15-545961; Cruz v. Redfin Corporation, U.S. District Court Northern District of California, Case No. 3:14-cv-05234-THE; Culley v. Lincare Inc. & Alpha Respiratory Inc., U.S. District Court eastern District of California, Case No. 2:15-cv-00081-GEB-CMK; Cunningham v. Leslie's Poolmart, Inc., U.S. District Court, Central District of California, Case No. 13-cv-02122-CAS; Curry v. California Testing Bureau/McGraw Hill, U.S. District Court, Northern District of California, Case No. C-05-4003 JW; Daniels, et al. v. Philip Morris, (In Re Tobacco Cases II) – Class Certification Granted, San Diego Superior Court, Case No. JCCP 4042; Davis v. Genex

Holdings Inc., Santa Clara County Superior Court, Case No. 1-13-cv-240830; Davis v. Clear Connection, LLC, San Diego County Superior Court, Case No. 37-2014-00035173-CU-OE-CTL; Day v. WDC Exploration, Orange County Superior Court, Case No. 30-2010-00433770; Dedrick v. Hollandia Dairy, San Diego County Superior Court, Case No. 37-2014-00004311-Cu-OE-CTL; Delmare v. Sungard Higher Education - Settled U.S. District Court, Southern District of California, Case No. 07-cv-1801; Del Rio v. Tumi Stores, Inc., San Diego County Superior Court, Case No. 37-2015-00022008-CU-OE-CTL; Dewane v. Prudential, U.S. District Court, Central District of California, Case No. SA CV 05-1031; Diesel v. Wells Fargo Bank, Orange County Superior Court, Case No. 30-2011-00441368; Dirienzo v. Dunbar Armored, U.S. District Court, Southern District of California, Case No. 09-cv-2745; Dobrosky v. Arthur J. Gallagher Service Company, LLC, Class certification Granted, No. EDCV 13-0646 JGB (Spx); Dodds v. Zaven Tootikian, Los Angeles County Superior Court, Case No. BC494402; Drumheller v. Radioshack Corporation, United States District Court, Central District of California, Case No. SACV11-355; Enger v. Kaiser Foundation Health Plan, U.S. District Court, Southern District of California, Case No. 09-cv-1670; Escobar v. Silicon Valley Security & Patrol, Inc., Santa Clara County Superior Court, Case No. 1-14-cv272514; Fierro v. Chase Manhattan - Class Certification Granted, Settled San Diego Superior Court, Case No. GIN033490; Figueroa v. Circle K Stores, Inc., San Diego County Superior Court, Case No. 37-2012-00101193-CU-OE-CTL; Finch v. Lamps Plus, (Lamps Plus Credit Transaction Cases), San Diego Superior Court, Case No. JCCP 4532; Fletcher v. Verizon, U.S. District Court, Southern District of California, Case No. 09-cv-1736; Francisco v. Diebold, U.S. District Court, Southern District of California, Case No. 09-cv-1889; Friend v. Wellpoint, Los Angeles Superior Court, Case No. BC345147; Frudakis v. Merck Sharp & Dohme, U.S. District Court, Central District California, Case No. SACV 11-00146; Fulcher v. Olan Mills, Inc., U.S. District Court, Northern District of California, Case No. 11-cv-1821; Gabisan v. Pelican Products, U.S. District Court, Southern District California, Case No. 08 cv 1361; Galindo v. Sunrun Installation Services Inc., San Diego County Superior Court, Case No. 37-2015-00008350-CU-OE-CTL; Gallagher v. Legacy Partners Commercial, Santa Clara County Superior Court, Case No. 112-cv-221688; Ghattas v. Footlocker Retail, Inc., U.S. District Court Central District of California, Case No. CV 13-0001678 PA; Gibson v. World Savings, Orange County Superior Court, Case No. 762321; Goerzen v. Interstate Realty Management, Co., Stanislaus County Superior Court, Case No. 679545; Gomez v. Enterprise Rent-A-Car, U.S. District Court, Southern District of California, Case No. 3:10-cv-02373; Gordon v. Wells Fargo Bank, U.S. District Court, Southern District of California, Case No. 3:11-cv-00090; Grabowski v. CH Robinson, U.S. District Court, Southern District of California, Case No. 10-cv-1658; Gross v. ACS Compiq Corporation, Orange County Superior Court, Case No. 30-2012-00587846-CU-OE-CXC; Gripenstraw v. Buffalo Wild Wings, U.S. District Court, Eastern District of California, Case No. 12-CV-00233; Gruender v. First American Title, Orange County Superior Court, Case No. 06 CC 00197; Guillen v. Univision Television Group, Inc. & Univision Management Co., San Francisco County Superior Court, Case No. CGC-12-526445; Gujjar v. Consultancy Services Limited, Orange County Superior Court, Case No. 30-2010-00365905; Gutierrez v. Five Guys Operations, LLC, San Diego County Superior Court, Case No. 37-2012-00086185-CU-OE-CTL; Handler v. Oppenheimer, Los Angeles Superior Court, Civil Action No. BC343542; Harley v. Tavistock Freebirds, LLC, Sacramento County Superior Court, Case No. 34-2014-00173010; Harrington v. Corinthian Colleges – Class Certification Granted, Orange Superior Court; United States Bankruptcy Court District of Delaware; Harvey v. PQ Operations, Inc., Los Angeles County Superior Court, Case No. BC497964; Henshaw v. Home Depot U.S.A., United States District Court, Central District of California, Case No. SACV10-01392; Heithold v. United Education Institute, Orange County Superior Court, Case No. 30-2013-00623416-CU-OE-CXC; Hibler v. Coca Cola Bottling, Settled U.S. District Court, Southern District of California, Case No. 11cv0298; Hildebrandt v. TWC Administration LLC & Time Warner NY Cable, LLC, U.S. District Court, Central District of California, Case No. ED-cv-13-02276-JGB; Hopkins v. BCI Coca-Cola Bottling Company of Los Angeles, United states District Court, Central District of California; U.S. Court of Appeals 9th Circuit; Howard v. Southern California Permanente

Medical Group, Los Angeles Superior Court, Case No. BC586369; Hughes v. Parexel International, Los Angeles County Superior Court, Case No. BC485950; Hurley v. Comcast of California/Colorado/Texas/Washington, Inc., Sonoma County Superior Court, Case No. SCV-253801; Irving v. Solarcity Corporation, San Mateo County Superior Court, Case No. CIV525975; Jacobs v. Nu Horizons - Settled Santa Clara County Superior Court, Case No. 111cv194797; Jefferson v. Bottling Group LLC (Pepsi) - Class Certification Granted, Orange County Superior Court, Case No. 30-2009-0018010; Jones v. E*Trade Mortgage, U.S. District Court, Southern District California Case No. 02-CV-1123 L (JAH); Kennedy v. Natural Balance - Dismissal Reversed on Appeal, San Diego Superior Court, Case No. 37-2007-00066201; Keshishzadeh v. Arthur J. Gallagher Service Co., U.S. District Court, Southern District of California, Case No. 09-cv-0168; Kinney v. AIG Domestic Claims / Chartis, U.S. District Court, Central District of California, Case No. 8:10-cv-00399; Kizer v. Tristar Risk Management, Orange County Superior Court, Case No. 30-2014-00707394-CU-OE-CXC; Kleinberg v. Reeve Trucking Company, Inc., San Diego County Superior Court, Case No. 37-2015-00001601-CU-OE-CTL; Kove v. Old Republic Title, Alameda County Superior Court, Case No. RG09477437; Krellcom v. Medley Communications, Inc., San Diego County Superior Court, Case No. 37-2013-00050245-CU-OE-CTL; Ladd v. Extreme Recovery, LP, Contra Costa County Superior Court, Case No. MSC11-02790; Langille v. EMC, U.S. District Court, Southern District of California, Case No. 09-cv-0168; Lawson v. Marquee Staffing, Los Angeles County Superior Court, Case No. 37-2012-00103717-CU-OE-CTL; Lazar v. Kaiser Foundation Health Plan, Inc., Santa Clara County Superior Court, Case No. 1-14-cv-273289; Lemmons v. Kaiser Foundation Hospitals, Inc., Sacramento County Superior Court, Case No. 34-2012-00125488; Levine v. Groeniger, Alameda County Superior Court, Case No. RG09476193; Linder v. OCWEN (In re Ocwen Federal Bank FSB Servicing Litig.) U.S. District Court, Central District California, Case No. 07cv501, U.S. District Court, Northern Dist. Illinois, Case No. MDL 1604; Litton v. Diebold, Incorporated, San Mateo County Superior Court, Case No. CIV524776; Lohn v. Sodexo, Inc. & SDH Services West, LLC, U.S. District Court Central District of California, Case No. 2:15-CV-05409; Lopez v. K-Mart, Ventura County Superior Court, Case No. BC351983; Louie / Stringer v. Kaiser, U.S. District Court, Southern District California, Case No. 08-cv-0795; Lucero v. Sears, U.S. District Court Southern District of California, Case No. 3:14-cv-01620-AJB; Lucero v. Kaiser Foundation Hospitals, Inc., San Diego County Superior Court, Case No. 37-2013-00075933-CU-OE-CTL; Magallanes v. TSA Stores, Inc., Santa Clara County Superior Court, Case No. 1-15-cv-283586; Magana v. El Pollo Loco, Inc., Orange County Superior Court, Case No. 30-2012-00613901-CU-OE-CXC; Maitland v. Marriott, U.S. District Court, Central District California, Case No. SACV 10-00374; Mann v. NEC Electronics America, Santa Clara County Superior Court, Case No. 109CV132089; Martinez v. Hydro-Scape Products, Inc., San Diego County Superior Court, Case No. 37-2014-00029157-CU-OE-CTL; Mathies v. Union Bank - Class Certification Granted, San Francisco County Superior Court, Case No. CGC-10-498077; McDermott v. Catalina Restaurant Group Inc., Orange County Superior Court, Case No. 30-2012-00574113-CU-OE-CXC; McPhail v. First Command, United States District Court for the Southern District of California, Case No. 05CV0179 IEG (JMA); Medina v. Universal Protection Service, LP, Santa Clara County Superior Court, Case No. BC572848; Meierdiercks v. 8x8, Inc., Santa Clara County Superior Court, Case No. 110CV162413; Metrow v. Liberty Mut. Managed Care LLC - Class Certification Granted, U.S. District Court Eastern District of California, Case No. 16-1133 JGB (Kkx); Meyer v. Thinktank Learning, Inc., Santa Clara County Superior Court, Case No. 1-15-cv-282698; Morales v. Wells Fargo Insurance Services USA, Inc., U.S. District Court Northern District of California, Case No. 3:13-cv-03867-EDL; Morse v. Marie Callender Pie Shop, U.S. District Court, Southern District California, Case No. 09-cv-1305; Moynihan v. Escalante Golf, Inc. & Troon Golf, LLC, San Diego County Superior Court, Case No. 37-2012-00083250-CU-OE-CTL; Muntz v. Lowe's HIW, San Diego County Superior Court, Case No. GIC880932; Najarian v. Macy's West Stores, Orange County Superior Court, Case No. 30-2010-00418401; Nelson v. Avon Products, Inc., Class Certification Granted, U.S. District Court for The Northern District of California, Case No. 13-cv-02276-BLF; Nguyen v. Wells Fargo Home Mortgage, Orange County

Superior Court, Case No. 05 CC 00116; Ochoa v. Eisai, Inc., U.S. District Court, Northern District California, Case No. 3:11-cv-01349; Ogans v. Nationwide Credit, Inc., Sacramento County Superior Court, Case No. 34-2012-00121054; Ohayon v. Hertz, United States District Court, Northern District of California, Case No. 11-1662; Olvera v. El Pollo Loco, Inc., Orange County Superior Court, Case No. 30-2014-00707367-CU-OE-CXC; Orozco v. Illinois Tool Works Inc., Class Certification Granted, U.S. District Court, Eastern District of California, Case No. 14-cv-02113-MCE; Ortega v. Prime Healthcare Paradise Valley, LLC, San Diego County Superior Court, Case No. 37-2014-00011240-CU-OE-CTL; Patel v. Nike Retail Services, Inc., U.S. District Court Northern District of California, Case No. 3:14-cv-04781-RS; Patelski v. The Boeing Company, United States District Court, Southern District of New York; transferred to United States District Court, Eastern District of Missouri; Pearlman v. Bank of America, San Diego Superior Court; Perry v. AT&T, U.S. District Court, Northern District California, Case No. 11-cv 01488; Picus v. Wal-Mart Stores, U.S. District Court, District of Nevada, Case No. 2:07-CV-00682; Pittard v. Salus Homecare, U.S. District Court, Southern District California, Case No. 08 cv 1398; Port v. Southern California Permanente Medical Group, San Diego County Superior Court, Case No. 37-2007-00067538; Postema v. Lawyers Title Ins. Corp., Orange County Superior Court, Case No. 30-2010-00418901; Pratt v. Verizon, Orange County Superior Court, Case No. 30-2010-00430447; Proctor v. Ameriquest, Orange County Superior Court, Case No. 06CC00108; Ramirez v. Estenson Logistics, LLC, Orange County Superior Court, Case No. 30-2015-00803197-CU-OE-CXC; Ray v. Lawyers Title, Fidelity National, Commonwealth Land Title, Chicago Title, Orange County Superior Court, Case No. 30-2010-00359306; Renazco v. Unisys Technical Services, L.L.C., San Francisco County Superior Court, Case No. CGC-14-539667; Reynolds v. Marlboro/Philip Morris U.S.A., United States Court of Appeals for the Ninth Circuit, Case No. 08-55114, U.S. District Court, Southern District of California, Case No. 05 CV 1876 JAH; Rezec v. Sony, San Diego Superior Court; Rix v. Lockheed Martin Corporation, U.S. District Court, Southern District of California, Case No. 09-cv-2063; Rieve v. Coventry Health Care, Summary Judgment *Sua Sponte* Granted for Plaintiff, *Rieve v. Coventry Health Care, Inc.*, 870 F. Supp. 2d 856 (C.D. Cal. 2012); Ritchie v. Mauran Ambulance Services, Inc., Los Angeles County, Case No. BC491206; Rivers v. Veolia Transportation Services, Class Certification Granted, Sonoma County Superior Court, Case No. SCV 255350; Roeh v. JK Hill, San Diego Superior Court, Case No. 37-2011-00089046; Rodriguez v. Protransport-1, LLC, San Francisco County Superior Court, Case No. CGC-12-522733; Romero v. Central Payment Co., LLC, Marin County Superior Court, Case No. CIV 1106277; Salas v. Evolution Hospitality, LLC, San Diego County Superior Court, Case No. 37-2012-00083240-CU-OE-CTL; Salem v. Alliance Human Services, Inc., San Diego County Superior Court, Case No. CIVRS1401129; Sanchez v. Beena Beauty Holding, Inc. d/b/a Planet Beauty, Los Angeles County Superior Court, BC566065; Santone v. AT&T – Settled United States District Court, Southern District of Alabama; Santos v. Sleep Train (Sleep Train Wage and Hour Cases), Orange County Superior Court, Case No. 30-2008-00214586, San Francisco County Superior Court, Case No. JCCP 4553; Saravia v. O.C. Communciations, Sacramento County Superior Court, Case No. 34-2015-00180734; Sawyer v. Vivint, Inc., U.S. District Court, Northern District of Illinois, Case No. 1:14-cv-08959; Sayaman v. Baxter Healthcare, U.S. District Court, Central District of California, Case No. CV 10-1040; Schuler v. Ecolab, Inc., U.S. District Court, Southern District of California, Case No. 3:10-cv-02255; Schulz v. Qualxserv, LLC / Worldwide Techservices - Class Certification Granted, U.S. District Court, Southern District of California, Case No. 09-cv-0017; Serrato v. Sociedad Textil Lonia, Corp., San Diego County Superior Court, Case No. 37-2012-00101195-CU-OE-CTL; Shrivastara v. Fry's Electronics, Santa Clara County Superior Court, Case No. 111cv192189; Sierra v. Oakley Sales Corp., Orange County Superior Court, U.S. District Court Central District of California; U.S. Court of Appeals 9th Circuit; Sirota v. Swing-N-Slide, Wisconsin District Court, County of Rock Wisconsin, Case No. 95CV726J; Small v. Kaiser Foundation Hospitals - Settled San Diego County Superior Court, Case No. 37-2011-00099011-CU-OE-CTL; Smith v. Kaiser Foundation Hospitals, U.S. District Court, Southern District of California, Case No.

08-cv-02353; Smith v. Fedex Ground Package system, Inc., Alameda County Superior Court, Case No. RG14734322; Sones v. World Savings / Wachovia; U.S. District Court, Northern District of California, Case No. 3:08-cv-04811; Spradlin v. Trump, U.S. District Court, District of Nevada, Case No. 2:08-cv-01428; Steele v. Kaiser Foundation Health Plan, U.S. District Court, Northern District of California, Case No. 07-5743; Steffan v. Fry's Electronics, Inc., Santa Clara County Superior Court, Case No. 1-13-CV-254011; Steroid Hormone Product Cases, Los Angeles Superior Court, JCCP4363; Strauss v. Bayer Corporation, United States District Court, District of Minnesota; Sustersic v. International Paper Co., Orange County Superior Court, Case No. 30-2009-00331538; Sutton v. Seasons Hospice & Palliative Care of California, Inc., Los Angeles County Superior Court, Case No. BC590870; Swartout v. First Alarm Security & Patrol, Inc., Santa Clara County Superior Court, Case No. 112-cv-231989; Talamantez v. The Wellpoint Companies, Inc., U.S. District Court, Central District of California, Case No. 12-cv-08058; Tan v. California State Automobile Assn. - Class Certification Granted, U.S. District Court, Central District California, Case No. 07cv1011, Orange County Superior Court, Case No. 30-2008-00231219; Tauber v. Alaska Airlines, et al., Los Angeles Superior Court; Thai v. Staff Assistance, Inc., Los Angeles County Superior Court, Case No. BC567943; Thomas v. Stanford Health Care d/b/a Stanford University Medical Center, Santa Clara County Superior Court, Case No. 1-14-cv-273362; Thomas-Byass v. Michael Kors Stores (California), Inc., U.S. District Court Central District of California, Case No. 5:15-cv-00369-JGB; Trujillo v. LivHome, Orange County Superior Court, Case No. 30-2008-00100372, San Diego County Superior Court, Case No. JCCP4570; Tull v. Stewart Title, U.S. District Court, Southern District California, Case No. 08-CV-1095; Turner v. C.R. England, U.S. District Court Central District of California, Case No. 5:14-cv-02207-PSG; Turner v. Ampac Fine Chemicals, LLC, Sacramento County Superior Court, Case No. 34-2015-00176993; Valadez v. Schering-Plough, U.S. District Court, Southern District California, Case No. 10-CV-2595; Van Gorp v. Ameriquest Mortgage/Deutsche Bank, U.S. District Court, Central District of California, Case No. SACV05-907 CJC (Anx); Varela v. The Walking Company, Los Angeles County Superior Court, Case No. BC562520; Veloz v. Ross Dress For Less, Inc., Los Angeles County Superior Court, Case No. BC485949; Vogel v. Price-Simms, Inc., Santa Clara County Superior Court, Case No. 114CV261268; Vrab v. DNC Parks & Resorts at Tenaya, Inc., Mariposa County Superior Court, Case No. 0010225; Vultaggio-Kish v. Golden State Lumber, Inc., San Mateo County Superior Court, Case No. CIV 51661; Wadhwa v. Escrow Plus, Los Angeles Superior Court; Waldhart v. Mastec North America, Inc., San Bernardino County Superior Court, Case No. CIVDS1419318; Walker v. Brink's Global Services USA, Inc. & Brinks Incorporated, Los Angeles County Superior Court, Case No. BC564369; Walsh v. Apple, Inc., U.S. District Court, Northern District California, Case No. 08-04918; Weinman v. Midbar Condo Development (Las Vegas One), U.S. District Court, District of Nevada, Case No. 2:08-cv-00684; Weltman v. Ortho Mattress - Class Certification Granted, U.S. District Court, Southern District California, Case No. 08-cv-0840, Orange County Superior Court, Case No. 30-2009-00327802; West v. Jerome's Furniture Warehouse, Sacramento County Superior Court, Case No. 34-2013-00147707-CU-OE-GDS; Wheat v. Jerome's Furniture Warehouse, San Diego County Superior Court, Case No. 37-2012-00094419-CU-OE-CTL; Wietzke v. Costar Realty, U.S. District Court, Southern District California, Case No. 09-cv-2743; Williams v. Lockheed Martin Corporation, U.S. District Court, Southern District California, Case No. 3:09-cv-01669; Wilson v. Wal-Mart Associates, Inc., U.S. District Court Central District of California, Case No. 8:14-cv-1021-FMO; Winston v. Lemoire Transportation, Inc., Contra Costa County Superior Court, Case No. C-15-00897; Wise v. Cubic, U.S. District Court, Southern District California, Case No. 08-cv-2315; Witman v. Level 3 Communications, San Diego County Superior Court, Case No. 37-2012-00091649-CU-OE-CTL; Yam v. Kaiser Foundation Hospitals, U.S. District Court, Northern District California, Case No. 10-cv-05225-SBA; Zurlo v. Mission Linen, U.S. District Court, Central District, Case No. 08cv1326; Baxt v. Scor U.S., Delaware Court of Chancery; Bronson v. Blech Securities - Settled U.S. District Court, Southern District of New York; Castro & Cardwell v. B & H Education, Inc., Los Angeles Superior Court Case No. BC456198;

Dibella v. Olympic Financial, U.S. District Court, District of Minnesota; Doyle v. Lorna Jane USA, Inc., Los Angeles County Superior Court, Case No. BC526837; Estrella v. B-Per Electronic, Inc. & My Wireless, Inc., San Diego County Superior Court, Case No. 37-2013-00048951-CU-OE-CTL; Ferrari v. Read-Rite, U. S. District Court, Northern District of California; Forever 21 Wage and Hour Cases - Settled San Diego County Superior Court, JCC Proceeding No. 4745; Hart v. United States Tobacco Co., Los Angeles Superior Court; In re Bank of America Wage and Hour Employment Practices Litigation, U.S. District Court, District of Kansas, Case No. MDL 2138; In re Walgreen Co. Wage and Hour Litigation, U.S. District Court, Central District of California, Case No. 11-cv-07664; Jackson v. Fresh & Easy Neighborhood Market Inc., Los Angeles County Superior Court, Case No. BC497964; U.S. Bankruptcy Court District of Delaware Case No. 13-12569 (KJC); Jordan/Ramos v. DMV -Sacramento County Superior Court; Kensington Capital v. Oakley, U. S. District Court, Southern District of California; Kensington Capital v. Vesta, U. S. District Court, Northern District of Alabama; Lopez v. Tire centers, LLC, U.S. District Court Northern District of California, Case No. 3:13-cv-05444-JCS; Miller v. Western Athletic Clubs, LLC, Santa Clara County Superior Court, Case No. 112-cv-228670; Moffett v. WIS International, San Diego County Superior Court, Case No. 37-2011-00099909-CU-OE-CTL; Perez v. Urban Outfitters, Inc., U.S. District Court Northern District of California, Case No. 13-cv-02628-JSW; Ridgewood Capital Management v. Gensia, U.S. District Court, Southern District of California, #CV-92-1500H; Sandoval v. Redfin Corporation, U.S. District Court Northern District, Case No. 3:14-cv-04444-SC; Shurman v. Scimed, State of Minnesota District Court, Fourth District, #94-17640; Sioson v. AMP Holding, Inc., Orange County Superior Court, Case No. 30-2013-00663825; Slatton v. G.E. Capital Mortgage Services, Camden County Superior Court, New Jersey, #CAML0256198; Somkin v. Molten Metal, U.S. District Court, District of Massachusetts, #9710325PBS; Sparks v AT&T, Illinois District Court - Madison County; Sullivan v. Lyon Management Group, Orange County Superior Court, Case No. 30-2013-00649432-CU-BT-CXC; Herencia v. Alexander's Steakhouse, Inc. – San Francisco County Superior Court, Case No. CGC-16-550551; Reinhardt v. Beverly Fabrics, Inc. – Sonoma County Superior Court, Case No. SCV-257217; DeBettencourt v. Interstate realty Management Company – San Joaquin County Superior Court, Case No. STK-CV-UOE-2015-0011942; Torres v. Bhandal Bros, Inc. – Santa Cruz County Superior Court, Case No. 16CV01555; Rodriguez v. El Toro Medical Investors Limited Partnership – U.S. District Court, Central District of California, Case No. 16-CV-00059-JLS-KES; Velez v. Timec Specialty Services, Inc. & Transfield Services– Los Angeles County Superior Court, Case No. BC614318; Henry v. Central Freight Lines, Inc. – U.S. District Court, Eastern District of California, Case No. 16-CV-00280-JAM-EFB; Taylor v. TIC – The Industrial Company – U.S. District Court, Central District of California, Case No. 16-CV-00186-VAP(SPX); Harvey v. Sears, Roebuck And Co. – Sacramento County Superior Court, Case No. 34-2017-00207556; Tapia v. Panda Express, LLC et al. – Los Angeles County Superior Court, JCCP No. 4919; Severson v. Lowe's HIW, Inc. – Sacramento County Superior Court, Case No. 34-2016-00189508; Bendon v. DTG Operations, Inc. - U.S. District Court, Central District of California, Case No. 16-CV-00861-FMO-AGR; Talavera v. ACS Dataline, LP – Los Angeles County Superior Court, Case No. BC617159; McHenry v. Prologix Distribution Services (West), LLC – Los Angeles County Superior Court, Case No. BC608948; Stone v. Prologistics Distribution, Inc. – Orange County Superior Court, JCCP No 4881; Easton v. Handy Technologies, Inc. – San Diego County Superior Court, Case No. 37-2016-00004419-CU-OE-CTL; Singh v. Total Renal Care, Inc. – San Francisco County Superior Court, Case No. CGC-16-550847; Conners v. Rag Traders Melrose, LLC – Los Angeles County Superior Court, Case No. BC591413; Saporito v. Space Explorations Technologies Corporation, Los Angeles Superior Court, Case No. BC554258; Calhoun v. Celadon Trucking Services, Inc., U.S. District Court, Central District of California, Case No. 16-CV-01351-PSG-FFM; Conners v. Mission Valley Kilt, LLC - San Diego County Superior Court, Case No. 37-2015-00036888-CU-OE-CTL; Shibley v. New Prime, Inc. - U.S. District Court, Central District of California, Case No. 17-CV-00321-DOC; Lawrenz v. Blacktalon Enterprises, Inc. - Sonoma County Superior Court, Case No. SCV-258205; Jamison v. Fitness 19 CA 121, LLC - Solano County

Superior Court, Case No. FCS046697; Brooks v. Archer Trucking, Inc. – Mendocino County Superior Court, Case No. SCUK-CVG-16-67106; Montgomery v. New Prime, Inc. – San Bernardino County Superior Court, Case No. CIVDS1611884; Mills v. Core-Mark International, Inc. – San Diego County Superior Court, case No. 37-2016-00009669-CU-OE-CTL; Lopez v. Networked Insurance Agents, LLC – Orange County Superior Court, Case No. 30-2016-00843587-CU-OE-CXC; Yberri v. Agent Provocateur, Inc. – Los Angeles County Superior Court, Case No. BC620413; Woodard v. BKD Twenty-One Management Company, Inc. – San Diego County Superior Court, Case No. 37-2016-00009682-CU-OE-CTL; Gallagher v. H.H. Restaurant, Inc. – San Diego County Superior Court, Case No. 37-2016-00031247-CU-OE-CTL; San Nicolas v. West Covina Corporate Fitness, Inc. – Los Angeles County Superior Court, Case No. BC16304; Summerlin v. Maplebear Inc., d/b/a Instacart – Los Angeles County Superior Court, Case No. BC 603030; Padilla v. Sutter West Bay Hospitals – San Mateo County Superior Court, Case No. CIV538977; Quagliariello v. Victory Entertainment, Inc. – Los Angeles County Superior Court, Case No. BC620273; Mohammad v. Tee It Up LLC – Contra Costa Superior Court, Case No. C16-01188; Pucilowski v. Esurance Insurance Services, Inc. – Placer County Superior Court, Case No. SCV0038790; Arias v. Alamitos Enterprises, LLC – Orange County Superior Court, Case No. 30-2016-00865183-CU-OE-CXC; Orzano v. Hazelwood Enterprises, Inc. – San Diego County Superior Court, Case No. 37-2016-00029231-CU-OE-CTL; Tejero v. Firstmed Ambulance Services, Inc. – Orange County Superior Court, Case No. 30-2016-00885355-CU-OE-CXC; Artis v. T-W Transport, Inc. – San Diego County Superior Court, Case No. 37-2016-00013010-CU-OE-CTL; Searles v. Navajo Express, Inc. – San Bernardino County Superior Court, Case No. CIVDS1613846; Lara v. Commercial Protective Service, Inc. – Los Angeles County Superior Court, Case No. BC648921; Picos v. Culinary of California, Inc. – San Diego County Superior Court, Case No. JCCP 4892; Samaniego v. A&I Transport, Inc. – Santa Cruz County Superior Court, Case No. 16CV01894; Bailey v. Romanoff Floor Covering, Inc. – U.S. District Court, Eastern District of California, Case No. 17-CV-00685-TLN-CMK; Aguirre v. Bitech, Inc. – Sacramento County Superior Court, Case No. 34-2016-002022; Phillips v. DI Overnight LLC – San Diego County Superior Court, Case No. 37-2016-00016800-CU-OE-CTL; Jacob v. Pride Transport, Inc. – Santa Cruz County Superior Court, Case No. 16CV1337; Bennett v. Heartland Express, Inc. of Iowa – San Diego County Superior Court, Case No. 37-2016-00015056-CU-OE-CTL; Stapf v. Mercer Health & Benefits Administration LLC – Los Angeles County Superior Court, Case No. BC643007; Armstrong v. Ruan Transport Corporation – San Bernardino County Superior Court, Case No. CIVDS1605897; Geiger v. Floyd's 99-California LLC – Orange County Superior Court, Case No. 30-2016-00874943-CU-OE-CXC; Mondrian v. Trius Trucking, Inc. – Fresno County Superior Court, Case No. 16CECG01501; Johnson v. Fedex Office and Print Services, Inc. – Alameda County Superior Court, Case No. RG17856291; Rios v. Pacific Western Bank – San Diego County Superior Court, Case No. 37-2016-00038083; Sanders v. Old Dominion Freight Lines, Inc. – San Diego County Superior Court, Case No. 37-2016-00030725-CU-OE-CTL; Taylor v. Gardner Trucking, Inc. – San Bernardino County Superior Court, Case No. CIVDS1614280; Couture v. Wal-Mart Associates, Inc. – U.S. District Court, Eastern District of California, case No. 16-CV-02202-VC; Bertuol v. AHMC Anaheim Regional Medical Center LP – Orange County Superior Court, Case No. 30-2017-00899024-CO-OE-CXC; Espinoza v. Prime Communications of California, LLC – San Mateo County Superior Court, Case No. 16CIV01563; Archuletta v. Tidy Services, Inc. – Orange County Superior court, Case No. 30-2016-008611892-CU-OE-CXC; Puccini v. Earthbound Farm, LLC – Santa Clara County Superior Court, Case No. 17CV308643; Vikram v. First Student Management, LLC – U.S. District Court, Northern District of California, Case No. 17-CV-04656-KAW; Blair v. Ashley Distribution Services, LTD. – U.S. District Court, Central District of California, Case No. 17-CV-01427-JAK-SP; Richardson v. Service Staffing, LLC – Orange County Superior Court, Case No. 30-2017-00899039-CU-OE-CXC; Coffin v. Certified Freight Logistics, Inc. – San Diego County Superior Court, Case No. 37-2016-00036523-CU-OE-CTL; Encarnacion v. S.A.S. Services Group, Inc. – San Diego County Superior Court, Case No. 37-2017-00026726-CU-OE-CTL; Vasquez v. Golden State Overnight Delivery Service, Inc. – Alameda County Superior

Court, Case No. RG17862924; Karr v. Tristar Managed Care, Inc. – Contra Costa Superior Court, case No. MSC17-00650; Gouveia v. Central Cal Transportation – San Joaquin County Superior Court, Case No. STK-CV-UOE-2017-0001765; Miranda v. Genex Services, LLC – U.S. District Court, Northern District of California, Case No. 17-CV-01438-JD; Spears v. Health Net of California, Inc. – Sacramento County Superior Court, Case No. 34-2017-00210560; Martinez v. Geil Enterprises, Inc. – Fresno County Superior Court, Case No. 17CECG01879; McComack v. Marriott Ownership Resorts, Inc. – U.S. District Court, Southern District of California, Case No. 17CV1663 BEN WVG; Velasco v. Lemonade Restaurant Group, LLC – Los Angeles County Superior Court, Case No. BC672235; Smith v. Personnel Services, Inc. – U.S. District Court, Northern District of California, Case No. 17-CV-03594-SK; Gabriel v. Kuni SDA, LLC – San Diego County Superior Court, Case No. 37-2017-000251191-CU-OE-CTL; Miller v. Mattress Firm, Inc. – Santa Clara County Superior Court, Case No. 17CV313148; Provost v. Yourmechanic, Inc. – San Diego County Superior Court, Case No. 37-2017-00024056-CU-OE-CTL; Zirpolo v. UAG Stevens Creek II, Inc. – Santa Clara County Superior Court, Case No. 17CV313457; Salazar v. Aids Healthcare Foundation – San Diego County Superior Court, Case No. 37-2017-00033482-CU-OE-CTL; Knipe v. Amazon.com, Inc. – San Diego County Superior Court, Case No. 37-2017-00029426-CU-OE-CTL; Erwin v. Caremeridian, LLC – Fresno County Superior Court, Case No. 17CECG03048; Davis v. Cox Communications California, LLC – U.S. District Court, Southern District of California, Case No. 16-CV-00989-BAS-BLM; Lara v. RMI International, Inc. – Los Angeles County Superior Court, Case No. BC597695; Harper v. C.R. England, Inc. – U.S. District Court, Utah Central Division, Case No. 16-CV-00906-DB; Mrazik v. C.H. Robinson Company – U.S. District Court, Central District of California, Case No. 12-CV-02067-CAS-PLA; Horn v. Rise Medical Staffing, LLC – U.S. District Court, Eastern District of California, Case No. 2:17-cv-01967-MCE-KJN; Pasallo v. GSG Protective Services CA Inc. – San Diego Superior Court, Case No. 37-2018-00037611-CU-OE-CTL; Smith v. Pacific Personnel Services, Inc. – U.S. District Court, Northern District of California, Case No. 17-cv-03594-SK; Terrado v. Accredited Debt Relief, LLC – San Diego Superior Court, Case No. 37-2018-00014181-CU-OE-CTL; Escobedo v. Pacific Western Bank – Los Angeles Superior Court, Case No. BC682686; Wade v. Automobile Club of Southern California – Orange County Superior Court, Case No. 30-2017-00960268-CU-OE-CXC; Montano v. American Automobile Association of Northern California – Contra Costa County Superior Court, Case No. CIVMSC18-01539; Perez v. Summit Interconnect, Inc. – Orange County Superior Court, Case No. 30-2018-00995403-CU-OE-CXC; Wolleson v. Gosch Imports, Inc. – Riverside County Superior Court, Case No. RIC170356; Banuelos v. Ortho Mattress, Inc. – Orange County Superior Court, Case No. 30-2020-01161304-CU-OE-CXC; Castellanos v. Miller Automotive Group, Inc. – Los Angeles County Superior Court, Case No. BC699211; Tressler v. Spoonful Management, LLC – Los Angeles County Superior Court, Case No. BC71940; Delph v. Employee Retention Services, LLC – San Diego County Superior Court, Case No. 37-2018-00007885; Romero v. May Trucking Company – U.S. District Court, Central District of California, Case No. 5:17-cv-02166-JGB-SHK; Miranda v. Genex Services, LLC – San Bernardino County Superior Court, Case No. CIVDS1700779; Moore v. Zirx Transportation Services, Inc. – Los Angeles County Superior Court, Case No. CGC-18-566655; Sottile v. Motion Recruitment Partners – Santa Clara County Superior Court, Case No. 18CV321677; Shahbazian v. Fast Auto Loans, Inc. – U.S. District Court, Central District of California, Case No. 2:18-cv-03076-ODW-KS; Salazar v. Johnson & Johnson Consumer Inc. – Los Angeles County Superior Court, Case No. BC702468; Conti v. L’Oreal USA S/D, Inc. – U.S. District Court, Eastern District of California, Fresno, Case No. 1:19-CV-00769-LJO-SKO; Mercado v. Security Industry Specialists, Inc. – Santa Clara County Superior Court, Case No. 17CV320059; Vikili v. Dignity Health – San Francisco County Superior Court, Case No. CGC-18-569456; Bagby v. Swissport SA, LLC – Los Angeles County Superior Court, Case No. BC691058; Henry v. Motion Entertainment Group, LLC – San Francisco County Superior Court, Case No. CGC18565643; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Lanuza v. AccentCare, Inc. – San Francisco County Superior Court, Case No. CGC-18-565521; Thomas v. Easy Driving School, LLC – San Diego County Superior Court, Case

No. 37-2018-00047639-CU-OE-CTL; Erickson v. Erickson – Contra Costa County Superior Court, Case No. MSC18-00307; Martin v. Menzies Aviation (USA) Inc. – San Francisco County Superior Court, Case No. CGC-18-566072; Mortimer v. Healthsouth Bakersfield Rehabilitation Hospital, LLC – Kern County Superior Court, Case No. BCV-18-102761; Alcaraz v. Red Lion Hotels Corporation – San Francisco County Superior Court, Case No. CGC-18-570310; Calhoun v. Total Transportation and Distribution, Inc. – San Diego County Superior Court, Case No. 37-2018-00058681-CU-OE-CTL; Rataul v. Overton Security Services, Inc. – Alameda County Superior Court, Case No. RG18891882; Beltran v. Compass Bank – San Diego County Superior Court, Case No. 37-2019-00024475-CU-OE-CTL; Kirshner v. Touchstone Golf, LLC – San Diego County Superior Court, Case No. 37-2018-00028865-CU-OE-CTL; Pizarro v. The Home Depot, Inc. – U.S. District Court for the Northern District of Georgia-Atlanta Division; Hatanaka v. Restore Rehabilitation, LLC – San Diego County Superior Court, Case No. 37-2018-00034780-CU-OE-CTL; Faria v. Carriage Funeral Holdings, Inc. – Contra Costa County Superior Court, Case No. MSC18-00606; Ontiveros v. Baker Concrete Construction, Inc. – Santa Clara County Superior Court, Case No. 18CV328679; Morales v. Redlands Automotive Services, Inc. – San Bernardino County Superior Court, Case No. CIVDS1807525; Ramirez v. Carefusion Resources, LLC – U.S. District Court, Southern District of California; Amster v. Starbucks Corporation – San Bernardino Superior Court, Case No. CIVDS1922016; Kutzman v. Derrel's Mini Storage, Inc. – U.S. District, Eastern District of California, Case No. 1:18-cv-00755-AWI-JLT; Marks v. Universal Propulsion Company, Inc. – Solano County Superior Court, Case No. FCS051608; Martinez v. Geil Enterprises, Inc. – Fresno County Superior Court, Case No. 17CECG01480; Teniente v. Cirrus Asset Management, Inc. – Los Angeles County Superior Court, Case No. 20STCV16302; Blackshear v. California Fine Wine & Spirits LLC – Sacramento County Superior Court, Case No. 34-2018-00245842; Warnick v. Golden Gate America West LLC – Los Angeles County Superior Court, Case No. BC714176; Bennett v. Dnata Aviation USA, Inc. – San Francisco County Superior Court, Case No. CGC-18-566911; George v. PF Stockton Fitness LLC – Sacramento County Superior Court, Case No. 34-2019-00261113-CU-OE-GDS; Oshana v. Farmers and Merchants Bank of Central California – Stanislaus County Superior Court, Case No. CV-19-003427; Vasquez v. Packaging Corporation of America – U.S. District Court, California Central District, Case No. 2:19-cv-01935-PSG-PLA; Palomino v. Zara USA Inc. – Orange County Superior Court, Case No. 30-2018-00992682-CU-OE-CXC; Simmons v. Joe & The Juice LA, LLC – San Francisco County Superior Court; Pacia v. CIM Group, L.P. – Los Angeles County Superior Court, Case No. BC709666; Flores v. Plastic Express – Los Angeles County Superior Court, Case No. BC71971; Madera v. William Warren Properties, Inc. – Orange County Superior Court, Case No. 30-2019-01055704-CU-OE-CXC; Hernandez v. Quality Custom Distribution – Orange County Superior Court, Case No. 30-2018-01010611-CU-OE-CXC; Arango v. Schlumberger Technology Corporation – Orange County Superior Court, Case No. 30-2019-01056839-CU-OE-CXC; Dandoy v. West Coast Convenience, LLC – Alameda County Superior Court, Case No. HG20051121; Ramirez v. J E H Enterprises, Inc. – San Francisco County Superior Court, Case No. CGC-19-574691; Sullen v. First Service Residential California, LLC – San Francisco County Superior Court, Case No. CGC-19-575131; Valentino v. East Bay Tire Co. – Solano County Superior Court, Case No. FCS053067; Murphy v. Rockler Retail Group, Inc. – Sacramento Superior Court, Case No. 34-2019-00251220; Shahbazian v. Onewest Bank – Los Angeles County Superior Court, Case No. 19STCV23722; Bruemmer v. Tempur Retail Stores LLC – Marin County Superior Court, Case No. CIV1803646; Antonios v. Interface Rehab, Inc. – Orange County Superior, Case No. 30-2019-01067547-CU-OE-CXC; Tavallodi v. DC Auto, Inc. – San Bernardino, Case No. CIVDS1833598; Miranda v. The Lloyd Pest Control Co. – San Diego County Superior Court, Case No. 37-2018-00052510-CU-OE-CTL; Soenardi v. Magnussen Imports, Inc. – Santa Clara County Superior Court, Case No. 18CV340003; Thai v. Team Industrial Services, Inc. – Los Angeles County Superior Court, Case No. 19STCV21953; Castillo v. A.J. Kirkwood & Associates, Inc. – Los Angeles County Superior Court, Case No. 19STCV04435; Moss v. Jabil Inc. – Alameda County Superior Court, Case No. HG20050536; Billosillo, Jr. v. Crown Energy Services, Inc. – San Diego County Superior Court,

Case No. 37-2018-00058254-CU-OE-CTL; Tarkington v. Freetime, Inc. – San Diego County Superior Court, Case No. 37-2019-00011473-CU-OE-CTL; McIntyre v. J.J.R. Enterprises, Inc. – Sacramento County Superior Court, Case No. 34-2019-00251220; Bucur v. Pharmaca Integrative Pharmacy, Inc. – San Diego County Superior Court, Case No. 37-2019-00009409-CU-OE-CTL; Batin v. McGee Air Services, Inc. – Santa Clara County Superior Court, Case No. 19CV347733; Terry v. McGee Air Services, Inc. – King County Superior Court of Washington, Case No. 19-2-3321-5 KNT; Weiss v. Niznik Behavioral Health Resources, Inc. – San Diego County Superior Court, Case No. 37-2019-00039441-CU-OE-CTL; Cavada v. Inter-Continental Hotels Group, Inc. – U.S. District Court, Southern District of California, Case No. 3:19-cv-01675-GPC-AHG; Lešević v. Spectraforce Technologies, Inc. – U.S. District Court, Northern District of California, Case No. 5:19-cv-03126-LHK; Mutchler v. Circle K Stores, Inc. – San Diego County Superior Court, Case No. 37-2020-00016331-CU-OE-CTL, Azima v. CSI Medical Group, – Santa Clara County Superior Court, Case No. 19CV345450; Porrás v. Baypointe Enterprises, LLC – Los Angeles County Superior Court, Case No. 19STCV31015; Mitchell v. Mack Trucking, Inc. – San Bernardino County Superior Court, Case No. CIVDS1928334; Watts v. T.R.L. Systems, Incorporated – Orange County Superior Court, Case No. 30-2019-01102457-CU-OE-CXC; Price v. DMSD Restaurants Inc. – San Diego County Superior Court, Case No. 37-2019-00024062-CU-OE-CTL; Jacobs v. Nortek Security & Control LLC – San Diego County Superior Court, Case No. 37-2019-0019735-CU-OE-CTL; Gonzalez v. Hub International Midwest – San Bernardino County Superior Court, Case No. CIVDS1900463; Cisneros v. Bluepearl California, Inc. – San Mateo Superior Court, Case No. 19-CIV-05707; Garcia v. Gallagher Basset Services – San Bernardino Superior Court, Case No. CIVDS2004140; Callow v. Adventist Health System/West – Placer County Superior Court, Case No. SCV0043607; Dominguez v. Kimco Facility Services, LLC – Los Angeles County Superior Court, Case No. 19STCV37592; Searles v. Robert Heath Trucking, Inc. – Los Angeles County Superior Court, Case No. 19STCY30808; Rangel v. Pioneer Hi-Bred international, Inc. – Yolo County Superior Court, Case No. CV-19-1797; Ivon v. Sinclair Television of California, Humboldt County Superior Court, Case No. DR190699; Williams v. Henkels & McCoy, Inc. – San Bernardino County Superior Court, Case No. CIVDS2003888; Cano v. Larry Green Chrysler Jeep Dodge, Inc. – Riverside County Superior Court, Case No. BLC1900184; Lopez v. Cepheid – Santa Clara County Superior Court, Case No. 19CV358827; Hernandez v. Quick Dispense, Inc. – Los Angeles County Superior Court, Case No. 19STCV29405; Lopez v. Lacoste USA, Inc. – San Bernardino County Superior Court, Case No. CIVDS1914626; Duhe v. Hospital Couriers Nevada, LLC – Contra Costa County Superior Court, Case No. MSC19-01377; Law v. Sequoia Equities, Incorporated – Contra Costa Superior Court, Case No. C19-01925; Dvorak v. Rockwell Collins, Inc. – San Diego County Superior Court, Case No. 37-2019-00064397-CU-OE-CTL; Noguera v. Metal Container Corporation – Riverside County Superior Court, Case No. RIC2003235; Leon v. Miller Event Management, Inc. – San Luis Obispo Superior Court, Case No. 19CV-0435; Leon v. Miller Event Management, Inc. – San Luis Obispo County Superior Court, Case No. 19CV-0435, Camacho-Bias v. Serve U Brands Inc. – Butte County Superior Court, Case No. 20CV00603; La Pietra v. Entertainment Partners Services, LLC – Los Angeles County Superior Court, Case No. 19STCV39529; Celis v. Theatre Box - San Diego, LLC – San Diego County Superior Court, Case No. ____; Ignacio v. Laboratory Corporation of America – U.S. District Court, California Central District, Case No. 2:19-cv-06079-AB-RAO; Kovnas v. Cahill Contractors LLC – Alameda County Superior Court, Case No. RG19037852; Hersh v. Mrs. Gooch's Natural Food – Los Angeles County Superior Court, Case No. 19STCV10444; Miller v. The Permanente Medical Group – Alameda County Superior Court, Case No. RG19045904; Vasquez v. Autoalert, LLC – Orange County Superior Court, Case No. 30-2019-01114549-CU-OE-CXC; Cavanaugh v. Morton Golf, LLC – Sacramento County Superior Court, Case No. 34-2019-00270176; Coley v. Monroe Operations, LLC – Alameda County Superior Court, Case No. RG20063188; Ramirez v. Sierra Aluminum Company – U.S. District Court, California Central District Court, Case No. 5:20-cv-00417-JGB-KK; Marrero v. Stat Med, P.C. – Alameda County Superior Court, Case No. HG19043214; Enriquez v. Solari Enterprises, Inc. – Los Angeles County Superior Court, Case No. 20STCV11129; Craig v.

Hometown Heart – San Francisco County Superior Court, Case No. CGC-20-582454; Lopez v. Hy0Lang Electric California, Inc. – San Diego County Superior Court, Case No. 37-2020-00012543-CU-OE-CTL; Heuklom v. Clara Medical Group, P.C. – San Francisco County Superior Court, Case No. CGC-20-585918; Dominguez v. Lifesafer of Northern California – Monterey County Superior Court, Case No. 20CV002586; Kiseleva v. Totalmed Staffing Inc. – U.S. District Court, California Northern District, Case No. 5:19-cv-06480; Vires v. Sweetgreen, Inc. – Santa Clara County Superior Court, Case No. 20CV365918; Kim v. Wireless Vision, LLC – San Bernardino County Superior Court, Case No. CIVDS2000074; Senoren v. Air Canada Corporation – Los Angeles County Superior Court, Case No. 20STCV13942; Clark v. Quest Diagnostics Incorporated – San Bernardino County Superior Court, Case No. CIVDS2018707; Green v. Shipt, Inc. – Los Angeles County Superior Court, Case No. 20STCV01001; Respass v. The Scion Group LLC – Sacramento County Superior County, Case No. 34-2020-00285265; Jackson v. Decathlon USA LLC – Alameda County Superior Court, Case No. RG2003024; Avacena v. FTG Aerospace Inc. – Los Angeles County Superior Court, Case No. 20STCV28767; Perez v. Butler America, LLC – Los Angeles County Superior Court, Case No. 20STCV20218; Christensen v. Carter’s Retail, Inc. – Orange County Superior Court, Case No. 30-2020-01138792-CU-OE-CXC; Astudillo v. Torrance Health Association, Inc. – Los Angeles County Superior Court, Case No. 20STCV18424; Hansen v. Holiday AI Management Sub LLC – Contra Costa County Superior Court, Case No. CIVMSC20-00779; Almahdi v. Vitamin Shoppe Industries Inc – Santa Clara County Superior Court, Case No. 20CV365150; Krisinda v. Loyal Source Government Services LLC – U.S. District Court, California Southern District, Case No. 3:20-cv-879-LAB-NLS; Ettedgui v. WB Studio Enterprises Inc – U.S. District Court, California Central District, Case No. 2:20-CV-08053-MCS (MAAx); Fernandez v. Nuvision Federal Credit Union – Orange County Superior Court, Case No. 30-2020-01161691-CU-OE-CJC; Aviles v. UPS Supply Chain Solutions, Inc. – Riverside County Superior Court, Case No. RIC2000727; Alcocer v. DSV Solutions, LLC – San Bernardino Superior Court, Case No. CIVDS2010345; Wilson v. Wholesome Harvest Baking, LLC – U.S. District Court, California Northern District, Case No. 4:20-cv-05186-YGR; Gregory v. Verio Healthcare, Inc. – Los Angeles County Superior Court, Case No. 20STCV37254; Rose v. Impact Group, LLC – Orange County Superior Court, Case No. 30-2020-01141107-CU-OE-CXC; Monasterio v. Citibank, N.A. – San Mateo County Superior Court, Case No. 20-CIV-03650; Martinez-Lopez v. Medamerica, Inc. – San Diego County Superior Court, Case No. 37-2020-00034393-CU-OE-CTL; Cox v. PRB Management, LLC – Solano County Superior Court, Case No. FCS055514; Nash v. K. Hovnanian Companies, LLC – Riverside County Superior Court, Case No. RIC2003319; Kyler v. Harbor Freight Tools USA, Inc. – San Diego County Superior Court, Case No. 37-2020-00015828-CU-OE-CTL; Roberts v. Solantic Corporation – Los Angeles County Superior Court, Case No. 20STCV41117; Price v. Mistras Group, Inc. – Los Angeles County Superior Court, Case No. 20STCV22485; Macias v. ABM Electrical & Lighting Solutions, Inc. – San Diego County Superior Court, Case No. 37-2020-00024997-CU-OE-CTL; Basu-Kesselman v. Garuda Labs, Inc. – San Francisco County Superior Court, Case No. CGC-20-585229; Armstrong v. Prometric LLC – Los Angeles County Superior Court, Case No. 20STCV29967; Ashlock v. Advantis Medical Staffing, LLC – San Diego County Superior Court, Case No. 37-2020-00022305-CU-OE-CTL; Wilson v. WXI Global Solutions, LLC – Los Angeles County Superior Court, Case No. 20STCV25007; Gandhale v. Select Rehabilitation, LLC – Monterey County Superior Court, Case No. 20CV002240; Starvoice v. G4S Secure Solutions (USA) Inc. – San Diego County Superior Court, Case No. 37-2020-00029421-CU-OE-CTL; Mbise v. Axlehire, Inc. – Alameda County Superior Court, Case No. RG20067350; Points v. C&J Services, Inc. – Kern County Superior Court, Case No. BCV-20-102483; Marshall v. PHI Air Medical, LLC – Lassen County Superior Court, Case No. 62973; Jauregui v. Cyctec Engineered Materials, Inc. – Orange County Superior Court, Case No. 30-2020-01164932-CU-OE-CXC

Blumenthal Nordrehaug Bhowmik DeBlouw LLP

2255 CALLE CLARA
LA JOLLA, CA - California 92037-3107

INVOICE

Invoice # 1
Date: 04/29/2025
Due On: 05/29/2025

Louis Noriega
6777 Phoenix Avenue
Riverside, CA 92504

CA2894

QVC, Inc.

Services

Attorney	Date	Notes	Quantity	Rate	Total
NDB	02/01/2023	Review and analyze original intake notes. Legal research regarding related litigation in State and federal Court. research Defendant's business operations in CA. Conference with Plaintiff to discuss claims.	3.90	\$850.00	\$3,315.00
NDB	02/05/2023	Review emails and documents from Plaintiff regarding DFEH and retaliation claims. Legal research regarding recent court opinions. Analyze off the clock work tasks. Conference with Plaintiff.	3.20	\$850.00	\$2,720.00
NDB	02/15/2023	Review and analyze entire employment file for legal claims. Review paystubs for overtime and 226(a) violations. Legal research recent settlements and court opinions. Call with Plaintiff to obtain background facts for Complaint.	4.40	\$850.00	\$3,740.00
NDB	02/21/2023	Draft original complaint. Review facts and law.	4.50	\$850.00	\$3,825.00
NDB	03/01/2023	Draft complaint. Analyze Defendant's policy documents.	2.50	\$850.00	\$2,125.00
NDB	03/06/2023	Finish drafting complaint. Send to Plaintiff for approval to file. Call with Plaintiff to discuss potential outcomes and obtain approval.	2.70	\$850.00	\$2,295.00
NDB	03/07/2023	Review case file and documents. Draft internal case notes memo detailing facts and claims.	2.00	\$850.00	\$1,700.00

NDB	03/15/2023	Review and research PAGA claims. Draft PAGA notice. Upload to LWDA website. Status update to Plaintiff.	2.50	\$850.00	\$2,125.00
RE	05/23/2023	Review case notes/damage analysis	0.50	\$475.00	\$237.50
RE	05/23/2023	Review & analyze employment file documents	2.50	\$475.00	\$1,187.50
RE	05/24/2023	Review, edit & finalize class action complaint draft	2.75	\$475.00	\$1,306.25
RE	05/24/2023	Draft summons, civil case cover sheet & certificate of assignment re class action	0.50	\$475.00	\$237.50
RE	05/24/2023	Review & finalize class action complaint package; file in SB sup. ct.	0.75	\$475.00	\$356.25
RE	05/30/2023	Review court-returned documents re class action; review docket; memo to firm re judicial/ department assignment and status of initial case management conference	0.50	\$475.00	\$237.50
SB	06/27/2023	Review complaint, analyze, advise ND	2.60	\$450.00	\$1,170.00
SB	07/06/2023	Revise complaint, advise ND	2.60	\$450.00	\$1,170.00
RE	07/16/2023	Prep initial docs for service of process re class action; identify reg agent; send out for service of process via knox	0.70	\$675.00	\$472.50
RE	07/19/2023	File POS of summons re class action; memo to firm re post service written discovery	0.50	\$675.00	\$337.50
VR	08/08/2023	Review and Analyze: review and analyze discovery and documents; review complaint; meet and confer with Def	1.60	\$750.00	\$1,200.00
RE	08/09/2023	Draft PAGA only complaint	3.75	\$675.00	\$2,531.25
RE	08/09/2023	Draft summons, civil case cover sheet & certificate of assignment re paga action	0.50	\$675.00	\$337.50
RE	08/09/2023	Review & finalize PAGA only complaint package; file in SB Sup. Ct.	0.75	\$675.00	\$506.25
VR	08/09/2023	Review and Revise: review and revise CMC statement; review arbitration agreements; advise KN; analyze arb agreements; finalize CMC statement	3.20	\$750.00	\$2,400.00
NDB	08/09/2023	Review PAGA Notice. Review and revise PAGA only complaint. Discuss with R. Ehmann. Status update to Plaintiff.	1.80	\$850.00	\$1,530.00
VR	08/10/2023	Draft: review court's orders and docket; draft joint report; correspondence to Def	2.10	\$750.00	\$1,575.00
RE	08/15/2023	Review court-returned documents; review docket re PAGA action; memo to firm re judicial/	0.50	\$675.00	\$337.50

		department assignment and status of initial trial setting conference			
RE	08/15/2023	Provide notice to LWDA of PAGA action filing	0.40	\$675.00	\$270.00
CJ	08/17/2023	Prepare for CMC by reviewing case notes, Statement to Court, complaint and claims	1.50	\$550.00	\$825.00
CJ	08/17/2023	Appear at CMC, annotate and memorialize outcome to firm	1.00	\$550.00	\$550.00
PM	08/22/2023	Review legal and factual claims of Plaintiff; advise team re status of action and arbitration provision.	1.50	\$750.00	\$1,125.00
KN	08/23/2023	Analysis of arbitration issues for stipulation; review initial draft stip and advise VR; review revised stipulation and respond to VR	0.50	\$950.00	\$475.00
VR	08/23/2023	Draft: draft dismissal re class case; review correspondence between parties	1.60	\$750.00	\$1,200.00
VR	09/14/2023	Receipt and Review of Correspondence: review correspondence from Def; review correspondence between parties; review stipulation re arbitration; research re PAGA waiver; advise PM	1.10	\$750.00	\$825.00
VR	09/15/2023	Review and Analyze: review arbitration agreement; review defendant's revisions to stipulation; advise PM and KN	0.70	\$750.00	\$525.00
VR	09/18/2023	Review and Analyze: review arbitration agreement; review stipulation to stay case; correspondence between parties; legal research re PAGA stay; advise PM and KN	2.10	\$750.00	\$1,575.00
VR	09/19/2023	Review and Revise: review and revise stipulation re PAGA case and arbitration; legal research re PAGA waiver; advise KN and PM	1.00	\$750.00	\$750.00
VR	09/20/2023	Review and Revise: review and revise stipulation re PAGA case and arbitration; legal research re PAGA waiver; correspondence to Def	1.20	\$750.00	\$900.00
RE	09/25/2023	Prep initial docs for service of process re PAGA; identify reg. agent; send out for service via knox	0.70	\$675.00	\$472.50
PM	10/05/2023	Review calendar and summary from prior CMC; strategize re status of stipulation re arbitration	0.50	\$750.00	\$375.00
VR	10/10/2023	Review and Revise: review and revise stipulation to stay case; review case law; review arbitration agreement; advise PM; correspondence to Def	1.10	\$750.00	\$825.00
PM	10/12/2023	Review status of dockets and actions; review status of stipulation re arbitration for PAGA action.	0.75	\$750.00	\$562.50
VR	10/18/2023	Correspondence with Opposing Counsel: correspondence to Def; review stipulation; review	0.50	\$750.00	\$375.00

		arbitration agreement; advise PM			
VR	12/18/2023	telephone conference with Def; review complaint and case notes; review correspondence between parties; review complaint of later filed action; advise AJB and PM	1.90	\$750.00	\$1,425.00
NDB	01/05/2024	Analyze late payment of wage claims under Sections 204 and 210. Legal research. Call with Plaintiff to discuss and provide status update.	2.20	\$850.00	\$1,870.00
PM	01/18/2024	Review legal and factual issues; review docket; telephonic conference with co-counsel; advise partners regarding related action; strategize re related action.	1.00	\$750.00	\$750.00
NDB	02/02/2024	Review and analyze related case and potential overlap. Review and revise joint prosecution agreement. Send to Plaintiff for signature. Call to discuss terms and status of litigation.	1.90	\$850.00	\$1,615.00
CJ	03/12/2024	Analyze status of case and claims, review complaint and case notes in preparation for drafting mediation data and document request	1.00	\$550.00	\$550.00
CJ	03/12/2024	Evaluate documents in file, begin to create exhibits for mediation	1.00	\$550.00	\$550.00
CJ	03/12/2024	Draft Mediation data and document request, advise AJB adn sent to counsel	1.00	\$550.00	\$550.00
CJ	03/13/2024	Review status of mediation demand, evaluate related case and co-counsel	0.50	\$550.00	\$275.00
CJ	04/11/2024	Evaluate P's wage statements adn 1198 file, review case notes and complaint	1.00	\$550.00	\$550.00
CJ	04/11/2024	Continue analysis of P's wage statements and 1198 file, annotate	0.50	\$550.00	\$275.00
CJ	04/11/2024	Review prior correspondence and status of pre-mediation data and documents	0.50	\$550.00	\$275.00
NDB	04/13/2024	Review and analyze all data produced for mediation purposes. Review court docket and case file. Analyze meal and rest break claims. Legal research regarding the same.	4.90	\$850.00	\$4,165.00
CJ	04/16/2024	Evaluate case adn claims, review 1198.5 file	1.00	\$550.00	\$550.00
CJ	04/16/2024	Continue review of 1198.5 file, pull exhibits for mediation analysis	1.00	\$550.00	\$550.00
NDB	04/20/2024	Review and analyze pay stub exemplars for overtime and regular rate claims. Legal research regarding the same. Review and analyze sick pay claims under PAGA. Call with Plaintiff to obtain background facts for mediation brief.	3.50	\$850.00	\$2,975.00

NDB	04/22/2024	Draft mediation brief. Analyze facts and law.	5.10	\$850.00	\$4,335.00
PM	04/23/2024	Telephonic conference with co-counsel and defense re mediation; review complaint and claims and allegations, strategize re mediation.	1.00	\$750.00	\$750.00
VR	04/25/2024	Review and Analyze: review and analyze documents and production; review mediation data request	0.40	\$750.00	\$300.00
CJ	04/30/2024	Prepare for T/c with Plaintiff, evaluate complaint, P's docs, and docs produced to date	1.00	\$550.00	\$550.00
CJ	04/30/2024	T/C with Plaintiff to prepare for mediation	1.00	\$550.00	\$550.00
CJ	04/30/2024	Review wage statements adn policies, revise Case Analysis worksheet	1.00	\$550.00	\$550.00
NDB	05/01/2024	Legal research regarding previous settlement with similar claims and workweeks for mediation valuation. Status update with Plaintiff regarding mediation brief.	2.90	\$850.00	\$2,465.00
NDB	05/01/2024	Review and revise mediation brief. Call with Plaintiff to clarify claims.	2.70	\$850.00	\$2,295.00
CJ	05/03/2024	Continue evaluation of Defendant's pre-mediation production, pull exhibits for mediation	1.50	\$550.00	\$825.00
CJ	05/06/2024	Evaluate related case	1.00	\$550.00	\$550.00
CJ	05/06/2024	Advise PM re related case status, t/c with co-counsel re same, memorialize	1.00	\$550.00	\$550.00
CJ	05/06/2024	Correspond with expert, review expert chart, continue preparation for mediation	1.00	\$550.00	\$550.00
SB	05/06/2024	Speak with client in advance of mediation, analyze claims, advise AJB	2.60	\$450.00	\$1,170.00
NDB	05/12/2024	Review and analyze all mediation materials including briefs and exhibits thereto. Review and analyze expert damage and penalty report. Prepare for mediation.	2.90	\$850.00	\$2,465.00
AB	05/13/2024	Prep and appear for mediation.	10.00	\$895.00	\$8,950.00
SB	05/13/2024	Attend mediation	8.00	\$450.00	\$3,600.00
KN	05/14/2024	Review mediator's proposal; discuss settlement issues with AJ and NBB	0.50	\$950.00	\$475.00
AB	05/23/2024	Draft MOU. Circulate to Cocounsel.	1.00	\$895.00	\$895.00
KN	05/28/2024	Review emails and draft MOU; advise AJ	0.60	\$950.00	\$570.00
AB	05/28/2024	Review/finalize draft of MOU. Draft corr to defendant and send w/ MOU.	2.00	\$895.00	\$1,790.00

NB	06/04/2024	Review MOU final, analyze re settlement issues.	3.00	\$995.00	\$2,985.00
KN	06/11/2024	Analysis of settlement issues; discuss with AJ; review revisions to MOU and advise AJ	1.00	\$950.00	\$950.00
AB	06/24/2024	Review defendant's changes to MOU. Review/analyze all code sections being released, including pleadings/complaints/PAGA letters. Revise MOU and draft/send corr to defendant re same.	3.00	\$895.00	\$2,685.00
NDB	06/26/2024	Review mediation results and notes. Review and analyze MOU terms. Send to Plaintiff for review and signature. Conference with Plaintiff to discuss settlement terms. Follow up for signature.	1.50	\$850.00	\$1,275.00
NB	06/28/2024	Review MOU, analyze outline long form	2.50	\$995.00	\$2,487.50
PM	07/28/2024	Review and analyze MOU; draft long form settlement agreement.	3.00	\$750.00	\$2,250.00
PM	07/29/2024	Confer with co-counsel re settlement agreement; review and revise draft settlement agreement.	0.75	\$750.00	\$562.50
PM	07/30/2024	Review and revise long form settlement agreement.	0.75	\$750.00	\$562.50
GG	08/08/2024	Draft CMC statement in PAGA action.	1.10	\$250.00	\$275.00
GG	08/08/2024	Review, finalize, and serve evidence preservation letter.	0.40	\$250.00	\$100.00
PM	08/08/2024	Review and revise draft CMC statement and finalize.	0.50	\$750.00	\$375.00
NB	08/08/2024	Review longform edits, analyze for final.	2.25	\$995.00	\$2,238.75
GG	08/09/2024	Finalize, file, serve CMC statement	0.40	\$250.00	\$100.00
PM	08/12/2024	Begin reviewing Def. revisions to long form settlement agreement; review TPA bids and strategize re the same.	1.00	\$750.00	\$750.00
PM	08/13/2024	Review joint cmc statement and draft long form; review claims in related action and strategize re operative complaint.	1.00	\$750.00	\$750.00
GG	08/15/2024	Review ROA re upcoming TSC	0.10	\$250.00	\$25.00
PM	08/15/2024	Draft operative amended complaint; review MOU.	3.00	\$750.00	\$2,250.00
PM	08/16/2024	Review and revise draft amended complaint; review Def. revisions to long form settlement agreement; draft memo outlining responses to Def. revisions to KN.	3.50	\$750.00	\$2,625.00
GG	08/16/2024	Add remote appearance information re TSC and circulate email.	0.10	\$250.00	\$25.00

KN	08/22/2024	Review and revise draft Agreement and Defendant's revisions thereto; advise PM; review SB guidelines and ensure compliance with Agreement and proposed revisions	1.80	\$950.00	\$1,710.00
PM	08/23/2024	Review and revise draft amended complaint; review and revise draft settlement agreement; review co-counsel complaint and strategize re amendment.	5.00	\$750.00	\$3,750.00
PM	08/26/2024	Draft amended complaint.	2.50	\$750.00	\$1,875.00
GG	08/27/2024	Review/adjust formatting on FAC.	0.80	\$250.00	\$200.00
PM	08/27/2024	Draft, review, revise amended complaint; review and revise draft long form agreement.	4.50	\$750.00	\$3,375.00
PM	09/03/2024	Review status of settlement agreement and follow up with defense.	0.25	\$750.00	\$187.50
PM	09/04/2024	Review Def. revisions to long form settlement agreement; review Def. revisions to draft amended complaint.	1.50	\$750.00	\$1,125.00
PM	09/09/2024	Review and revise draft amended complaint; draft stip to file amended complaint.	1.75	\$750.00	\$1,312.50
KN	09/10/2024	Draft Exhibits B and C; email Def	2.30	\$950.00	\$2,185.00
GG	09/16/2024	Finalize FAC, draft POS, file/serve stipulation for leave to file FAC.	0.70	\$250.00	\$175.00
GG	09/19/2024	Adjust formatting, finalize, draft pos, file and serve FAC.	0.90	\$250.00	\$225.00
CJ	09/26/2024	Analyze settlement agreement, MOU, evaluate status of discovery and plaintiff's participation in discovery, evaluate complaint in preparation for drafting client declaration	1.00	\$550.00	\$550.00
CJ	09/26/2024	Draft client declaration, continue analysis of claims and work to date	1.00	\$550.00	\$550.00
KN	09/27/2024	Review and revise Exhibit A; review final draft of Agreement; Review Def revisions to Exhibits B and C, and revise exhibits for final; review next steps and email co-counsel; email to Def	2.75	\$950.00	\$2,612.50
NDB	09/27/2024	Review settlement agreement terms and exhibits for conformity with MOU. Send to Plaintiff for signature. Call to explain terms and process of settlement approval.	1.30	\$850.00	\$1,105.00
CJ	09/30/2024	Evaluate settlement agreement, revise client declaration review retainer, draft correspondence with client re declaration	1.00	\$550.00	\$550.00
GG	10/01/2024	ROA review re stipulation to file FAC, contact	0.40	\$250.00	\$100.00

		clerk, attempt download from portal.			
KN	10/03/2024	Work on approval issues; review case documents and Kullar valuation materials; review and revise draft motion; memo to co-counsel regarding final issues with motion	2.00	\$950.00	\$1,900.00
KN	10/03/2024	Further analysis of issues for motion; emails with counsel; revise motion further and memo to co-counsel	1.00	\$950.00	\$950.00
KN	10/04/2024	Review and revise motion for prelim approval; email draft motion to Defendant	1.00	\$950.00	\$950.00
GG	10/09/2024	Tel. call to clerk re stip to file FAC	0.30	\$250.00	\$75.00
PM	10/10/2024	Review long form settlement agreement and status of prelim approval motion.	0.40	\$750.00	\$300.00
GG	10/14/2024	ROA search re Stip to file FAC, download, save, circulate and file/serve FAC.	0.80	\$250.00	\$200.00
GG	10/14/2024	Tel. call to clerk re reservation of hearing for motion for prelim. approval.	0.20	\$250.00	\$50.00
KN	10/14/2024	Work on approval motion; review Def revisions; revise memorandum; redline revisions to supporting declaration of Ardestani; memo to staff; email to co-counsel	3.75	\$950.00	\$3,562.50
KN	10/14/2024	Emails with Def; update Notice; update proposed order; emails with co-counsel	0.75	\$950.00	\$712.50
KN	10/16/2024	Draft declaration ISO motion; review and revise motion for prelim app; emails with counsel; prepare Admin decl	3.00	\$950.00	\$2,850.00
GG	10/16/2024	Review memorandum ISO prelim approval, create table of authorities and table of contents.	1.60	\$250.00	\$400.00
KN	10/18/2024	Review and revise motion for filing; update documents; file and serve motion; serve LWDA; email counsel	2.50	\$950.00	\$2,375.00
NB	10/18/2024	Review prelim approval motion for filing. Analyze.	3.00	\$995.00	\$2,985.00
GG	10/28/2024	ROA check re conformed FAC, download, save to file and upload to LWDA portal.	0.40	\$250.00	\$100.00
GG	12/02/2024	Finalize, file, serve CMC statement.	0.40	\$250.00	\$100.00
GG	12/04/2024	Reviewed ROA re upcoming Hearing re Motion for preliminary approval, and updated events email.	0.10	\$250.00	\$25.00
GG	12/10/2024	Checked ROA re pending CMC statement filed.	0.10	\$250.00	\$25.00
KN	12/12/2024	Work on issues regarding hearing; contact clerk;	0.40	\$950.00	\$380.00

emails with counsel					
KN	12/17/2024	Court appearance - motion for prelim approval; prepare for hearing; memo to file.	1.00	\$950.00	\$950.00
KN	01/31/2025	Review status; research issue; download signed order; email counsel	1.00	\$950.00	\$950.00
KN	02/06/2025	Review emails and status; work on Admin issue	0.50	\$950.00	\$475.00
KN	02/24/2025	Review admin email and formatted class notice; respond to questions	0.50	\$950.00	\$475.00
NDB	03/05/2025	Review and respond to class member inquiries regarding status of settlement, claims at issue, and potential payout timing.	1.00	\$850.00	\$850.00
PM	04/21/2025	Review timeline re final approval motion filing; correspond with co-counsel regarding final approval motion and BNBD declaration timing.	0.50	\$750.00	\$375.00
KN	04/25/2025	Review draft motion; memo to co-counsel re: issues	1.00	\$950.00	\$950.00
KN	04/29/2025	Draft declaration ISO motion; prepare exhibits; review billing	1.75	\$950.00	\$1,662.50
				Quantity Subtotal	227.3
				Services Subtotal	\$171,201.25

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	03/15/2023	PAGA Filing Fee	1.00	\$75.00	\$75.00
Expense	05/31/2023	Onelegal/Court Filing Fee	1.00	\$1,642.05	\$1,642.05
Expense	07/18/2023	Knox	1.00	\$155.25	\$155.25
Expense	07/21/2023	Onelegal/court fees	1.00	\$134.09	\$134.09
Expense	08/16/2023	Court filing via OneLegal	1.00	\$92.66	\$92.66
Expense	08/16/2023	Onelegal/Court Fees	1.00	\$1,590.58	\$1,590.58
Expense	08/26/2023	filing via One Legal	1.00	\$164.72	\$164.72
Expense	09/05/2023	KNOX Filing and Messenger Service	1.00	\$115.15	\$115.15
Expense	09/30/2023	Onelegal/Court Fees	1.00	\$144.39	\$144.39
Expense	03/01/2024	Mediation Fees - D. Rotman	1.00	\$10,325.00	\$10,325.00
Expense	05/22/2024	Berger Consulting.	1.00	\$3,600.00	\$3,600.00

Expense	07/23/2024	Berger Consulting Fees.	1.00	\$840.00	\$840.00
Expense	08/12/2024	One Legal Filing Fee: One Legal Filing Fee	1.00	\$20.68	\$20.68
Expense	09/17/2024	One Legal Filing Fee: One Legal Filing Fee	1.00	\$61.95	\$61.95
Expense	09/20/2024	One Legal Filing Fee: One Legal Filing Fee	1.00	\$61.95	\$61.95
Expense	09/30/2024	LexisNexis	1.00	\$7.00	\$7.00
Expense	10/01/2024	One Legal Filing Fee: One Legal Filing Fee	1.00	\$42.54	\$42.54
Expense	10/14/2024	Document retrieval fee: Document retrieval re FAC download,.	1.00	\$13.58	\$13.58
Expense	10/14/2024	One Legal Filing Fee: One Legal Filing Fee	1.00	\$61.95	\$61.95
Expense	10/18/2024	Filing fee - motion; one legal charge	1.00	\$77.44	\$77.44
Expense	10/26/2024	One Legal Filing Fee: One Legal Filing Fee	1.00	\$20.86	\$20.86
Expense	10/28/2024	Filing fee - motion; one legal charge	1.00	\$83.84	\$83.84

Expenses Subtotal \$19,330.68

Time Keeper	Quantity	Rate	Total
AJ Bhowmik	16.0	\$895.00	\$14,320.00
Norm Blumenthal	10.75	\$995.00	\$10,696.25
Scott Blumenthal	15.8	\$450.00	\$7,110.00
Nicholas De Blouw	57.4	\$850.00	\$48,790.00
Ricardo Ehmann	7.8	\$675.00	\$5,265.00
Ricardo Ehmann	7.5	\$475.00	\$3,562.50
Charlotte James	20.5	\$550.00	\$11,275.00
Piya Mukherjee	34.65	\$750.00	\$25,987.50
Kyle Nordrehaug	29.6	\$950.00	\$28,120.00
Victoria Rivapalacio	18.5	\$750.00	\$13,875.00
Gerardo Galaviz	8.8	\$250.00	\$2,200.00

Quantity Total 227.3

Subtotal \$190,531.93

Total \$190,531.93

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1	05/29/2025	\$190,531.93	\$0.00	\$190,531.93
Outstanding Balance				\$190,531.93
Total Amount Outstanding				\$190,531.93

Please make all amounts payable to: Blumenthal Nordrehaug Bhowmik DeBlouw LLP

Please pay within 30 days.

LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389

6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

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

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

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