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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

EDGARDO MARQUINA, MARVIN
LOUKA, ULISES URIBE and JULIAN
DOMINGO, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

AT&T MOBILITY SERVICES LLC,
a Limited Liability Company; and DOES
1 through 50, inclusive,

Defendants.

Case No. 23STCV24512

**DECLARATION OF DAVID C. HAWKES
IN SUPPORT OF UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND AWARD
OF ATTORNEYS' FEES, LITIGATION
COSTS AND SERVICE AWARDS**

Hearing Date: March 23, 2026

Hearing Time: 10:00 a.m.

Judge: Hon. Timothy Patrick Dillon
Dept.: 15

Complaint Filed: October 9, 2023

Trial Date: Not Set

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12 Attorneys for Plaintiffs

1 I, David C. Hawkes, declare as follows:

2 1. I am an attorney at law duly admitted to practice before all courts of the State of
3 California and one of the attorneys of record herein for Plaintiff EDGARDO MARQUINA,
4 MARVIN LOUKA, ULISES URIBE and JULIAN DOMINGO ("Plaintiffs") in Los Angeles
5 County Superior Court Case No. 23STCV24512. The following facts are known to me of my own
6 personal knowledge and circumstances in the above-entitled matter as they relate to this
7 Declaration, and if called upon, I could and would testify competently thereto.

8 2. Absent settlement, Plaintiffs and the proposed Class would face real risks on the
9 merits and potential for being unable to certify the Class. In addition, they would face a lengthy
10 delay---through trial, likely appeal and potential re-trial---before receiving any potential recovery.
11 Plaintiff's counsel therefore estimate that even if the Class was 100% successful at every stage of
12 future litigation, Class members would not receive any relief until at least 2027, and possibly 2028
13 or 2029. Thus, the proposed Settlement confers significant and timely relief to the Class without
14 further delay by eliminating the substantial risk of the Class not achieving certification and/or
15 establishing liability and, as a result, receiving *no* recovery whatsoever.

16 3. To ensure that this case was properly prosecuted, my firm was precluded from
17 taking on other cases, and in fact had to turn away other meritorious fee generating cases. This
18 case was accepted on a contingency fee basis and my firm advanced and risked litigation expenses
19 for more than two years. Specifically, my firm incurred out-of-pocket costs totaling \$5,762.86
20 including filing fees (\$507) mediation fees (\$4,950), and costs for service of process (\$305.85).

21 4. These litigation expenses were reasonably incurred in the prosecution and
22 resolution of this matter, but have not been reimbursed. My firm incurred these out-of-pocket
23 expenses without any assurance they would be repaid. To ensure that this case was properly
24 prosecuted, Blanchard Krasner & French ("BKF") was precluded from taking on other cases, and
25 in fact had to turn away other meritorious fee-generating cases. In addition to significant costs
26 and lost opportunities with other matters, and the risks taken by accepting this case on a
contingency basis, this case involved approximately 94.0 attorney hours of BKF's time.

5. BKF undertook this litigation on a wholly contingent basis. From the outset, BKF understood it was embarking on a complex, expensive and lengthy litigation with no guarantee of ever being compensated for the large investment of time and money the case would require.

6. In undertaking that responsibility, BKF was obligated to assure that sufficient resources were dedicated to the prosecution of this litigation and that funds were available to compensate staff and the considerable out-of-pocket costs that a case such as this entails.

7. Because of the nature of a contingent practice involving complex litigation lasting lengthy periods of time, not only do contingent litigation firms have to pay regular overhead, but they also have to advance the expenses of the litigation. With an average lag time of two to three years for these cases to conclude, the financial burden on contingent counsel is far greater than on a firm that is paid on an ongoing basis. I am informed that there have been many hard-fought lawsuits where, because of the discovery of facts unknown when the case commenced, or changes in the law during the pendency of the case, or a decision of a judge or jury following a trial on the merits, excellent professional efforts of the plaintiffs' bar produced no fee for counsel.

8. I am a 2002 graduate of the University of San Diego School of Law, admitted to practice before the United States District Court, Southern District of California (Northern and Central Districts of California as well), United States Court of Appeals for the Ninth Circuit, and all California State Courts. BKF is a preeminent La Jolla based law firm and focuses on business and civil litigation, corporate and tax matters, real estate matters and litigation, estate planning and trust litigation, and representing both employers and employees in employment matters and litigation. BKF has significant experience in complex class action litigation, including wage and hour and consumer class actions. With BKF, I personally have extensive experience litigating wage and hour class action matters, including certification of numerous classes and approval of numerous class settlements. For example –

a. *Diep et al v. Polaris Pharmacy Services, LLC et al.*, San Diego Superior Court

Case No. 37-2024-00004618-CU-OE-CTL, a wage and hour class action

1 certified for settlement purposes on behalf of a class of California-based
2 employees regarding unlawful forfeiture of vacation pay.

3 b. *Kee et al v. Hiossen, Inc.*, San Diego Superior Court Case No. 37-2019-
4 00023035-CU-OE-CTL, a certified wage and hour class action on behalf of a
5 class of California-based employees regarding unlawful forfeiture of Paid Time
6 Off.

7 c. *O'Brien et al v. Cathy Jean, Inc.*, San Diego Superior Court Case No. 37-2011-
8 00085539-CU-OE-CTL, a certified wage and hour class action on behalf of a
9 class of retail sales employees.

10 d. *Beza et al v. Boyd Gaming et al.*, Clark County District Court, Case No. A-21-
11 845753, wage and hour class action certified for settlement purposes on behalf
12 of a class of casino/hotel/resort employees for violations of Nevada's SB-386
13 "Hospitality and Travel Workers Right To Return Act".

14 e. *Lopez et al v. Amazon.com, LLC et al.*, Case No. 22-cv-1414-RSH-KSC (S.D.
15 Cal.), a wage and hour class action certified for settlement purposes on behalf
16 of a class of California non-exempt delivery drivers.

17 f. *Bennett et al. v. Wyndham Vacation Ownership, Inc. et al.*, Case No. 22-cv-
18 01050 JES(BLM) (S.D. Cal.), a wage and hour class action certified for
19 settlement purposes on behalf of a class of California non-exempt marketing
employees.

20 g. *Preston et al. v. Porch.com et al.*, Case No. 21-cv-00168 JLS(BLM) (S.D. Cal.),
21 a wage and hour class action certified for settlement purposes on behalf of a
22 class of non-exempt California employees.

23 h. *Jones v. SeaWorld Parks & Entertainment, Inc., et al.* Case No. 37-2018-
24 00057055-CU-OE-CTL, a wage and hour class action certified for settlement
25 purposes on behalf of a class of non-exempt hourly California employees.

i. *Walker et al. v. Corepower Yoga LLC*, San Diego Superior Court Case No. 37-2011-00101074-CU-OE-CTL, a wage and hour class action certified for settlement purposes on behalf of a class of California yoga instructors.

9. Additionally, both with BKF and previous law firms, I have extensive additional experience in class action litigation matters, including class action cases against defendants such as FH Paschen/FHP Techtonics/SN Nielsen, Coldwell Banker, Prudential, Re/Max, San Diego Padres, AOL/Time Warner, Daimler/Chrysler, Broadcom, Coleman University, Fry's Electronics, and others, as well as defending class action cases against such companies as Comprehensive Educational Services (d/b/a "ACES"), Roadrunner Sports, USA, Inc., Reseda Discount Corporation, Melrose Facility Management, LLC, Huntington Pacific Hotels, LLC, and Big Bully Turf, Inc.

10. I have litigated the claims alleged in the present action over the past 27 months and have participated in numerous aspects of this case since the initial filing of a related action filed by Plaintiff LOUKA in the Southern District of California on November 2, 2023. (*See Marvin Louka, et al. v. AT&T Mobility Services LLC, et al.*; S.D. Cal. Case 3:23-cv-02031-RSH-MSB). Pursuant to stipulation with Defendant AT&T MOBILITY SERVICES LLC ("Defendant"), Plaintiff Louka voluntarily dismissed the S.D. Cal. action on March 5, 2024 and was added as a named plaintiff in the present action in Los Angeles County Superior Court (*See Joint Stipulation to File First Amended Complaint*, filed June 14, 2024). All of Louka's class-wide allegations in the Southern District of California action were added to the present action in Los Angeles County Superior Court upon the filing of the First Amended Class Action Complaint on June 14, 2024.

11. My work product in the *Louka* action that was filed in the Southern District of California on November 2, 2023 was utilized in the instant litigation and my time spent on the Southern District of California action was "inextricably linked" to the issues raised in the present litigation. *See Gulfstream III Assocs., Inc. v. Gulfstream Aerospace Corp.* (3d Cir. 1993) 995 F.2d 414, 420; *Harman v. City & Cnty. of San Francisco* (2007) 158 Cal.App.4th 407, 417. For

1 example, in the originally filed *Louka* action in the Southern District of California, my co-counsel
2 and I investigated, discovered and developed a specific theory of liability regarding AT&T retail
3 employees routinely working off the clock, as documented in Defendant's own written policies:

4 Defendant has also intentionally and improperly administered and employed a
5 corporate policy, practice and/or custom that requires its retail store employees,
6 including Plaintiff, to report for their assigned shifts approximately 15 to 20
7 minutes prior to the "beginning" of their shifts in order to "set up" Defendant's retail
8 locations. These mandatory "set up" procedures, as memorialized in Defendant's
9 detailed "*Store Opening Policy - AT&T Retail*," require Defendant's non-exempt
10 employees to inspect the store front for signs of forced entry (such as broken glass
11 or a damaged door), look for "suspicious people" loitering near the store, unlock
12 and enter the store and then relock the front and rear doors after entering, disarm
13 the security alarm, place inventory on the floor in a designated locked cabinet or
14 drawer, power on all POS terminals and payment stations, power on all computers
15 and log into their workstations -- all *before* clocking into Defendant's timekeeping
16 system. This process takes approximately 15 to 20 minutes to complete, each and
17 every work shift, before Defendant's employees are logged into the timekeeping
18 system. Defendant has also intentionally and improperly administered and
19 employed a corporate policy, practice and/or custom that requires its retail store
20 employees, including Plaintiff, to continue working for Defendant approximately
21 10 to 15 minutes after the "end" of their work shifts in order to "close" Defendant's
22 retail locations. These mandatory "closing" procedures, as memorialized in
23 Defendant's detailed "*Daily Store Closing Policy - AT&T Retail*," require
24 Defendant's non-exempt employees to reconcile and balance all registers and
25 prepare the daily deposit, lock all interior doors, including rooms containing
26 security and server equipment, and all exit activate the store alarm, close the store
27 security gates, all after logging out of Defendant's timekeeping system. This
process takes approximately 10 to 15 minutes to complete, each and every work
shift, after Defendant's employees are logged off of the timekeeping system. Retail
store employees who fail to complete these pre-shift "set up" procedure and/or post-
shift "closing" duties are reprimanded and given verbal warnings. This additional
labor is not reflected on the pay stubs or work records of Plaintiff's and Defendant's
other non-exempt employees. These required pre-shift "set up" procedures also
increased Plaintiff's workday shift beyond the scheduled eight (8) hours and thus
entitled him to overtime compensation from Defendant, for which he was also not
paid.

See Marvin Louka, et al. v. AT&T Mobility Services LLC, et al.; S.D. Cal. Case
3:23-cv-02031-RSH-MSB (Dkt. No. 1, Complaint filed Nov. 2, 2023, ¶ 5).

12. The aforementioned theory of liability was not previously alleged in the present
action in the Los Angeles County Superior Court but rather was included, *verbatim*, in the First

1 Amended Class Action Complaint upon Plaintiff Louka's addition as a party plaintiff and
2 proposed class representative in this matter. (See First Amended Class Action Complaint, filed
3 June 14, 2024, ¶¶ 5, 16.) This detailed off-the-clock theory, originally alleged by Plaintiff Louka
4 in the Southern District of California action, has been prosecuted and further developed in the
5 present action as a result of me and my co-counsel's appearance as counsel of record in this matter.
6 As a result, me and my-co-counsel's work in the present action, which began upon the filing of
7 the original complaint in the Southern District of California action, has brought significant value
8 to the class claims in the case at hand. (See Declaration of Kyle Nordrehaug in Support of Motion
9 for Preliminary Approval of Class Action Settlement, filed Aug. 19, 2025, at 6:18-7:14.) ("The
10 off-the-clock claim...based on allegations that Defendant knew or should have known the Class
11 Members worked off the clock due to pre-shift and post-shift activities such as inspections, login
12 activities and shut down procedures" has a maximum potential value of \$5,197,500.)

13 13. As demonstrated in my attached billing records, which are attached hereto as
14 **Exhibit "A,"** I have accrued 94.0 hours of billable time throughout the course of the present class
15 action and PAGA litigation. My total Lodestar fee amount (reasonable accrued hours multiplied
16 by reasonable hourly rate) is therefore \$59,220.00 (94.0 hours x \$630 per hour). I expect my
17 Lodestar to increase with attendance at the final approval hearing and subsequent execution of the
18 settlement terms. Regarding my firm's billing records at Exhibit "A", my firm's policy is to hold
19 all time billed to contingency matters as "work in progress" until payment is received on the
20 matter. For this reason, the billing records reflect a notation of "unbilled". Additionally, time
21 worked in prior years is reflected in my firm's billing records at my hourly rate at the time. For
22 this reason, the "total fees" at Exhibit "A" differ slightly from the lodestar calculation for purposes
23 of this motion, which is calculated at my current hourly rate using the number of hours worked
24 pursuant to Exhibit "A".

25 14. My work on the present action can be roughly categorized into nine main
26 categories: (1) pre-filing investigation and research; (2) drafting of pleadings and amendments; (3)
drafting written discovery, including information and document requests and related

1 communications and meet and confer efforts with opposing counsel; (4) analyzing payroll and
2 wage records and written corporate policies, manuals and training materials; (5) drafting mediation
3 brief and engaging in damages analysis; (6) engaging in a full-day mediation; (7)
4 communications with Plaintiffs and witnesses; (8) preparing appropriate settlement
5 documents, including the Settlement and Class Notice, and communications with opposing
6 counsel regarding same; (9) and moving for preliminary and final approval of the Class Action
7 Settlement; and performing various other tasks necessary to produce the benefit this
8 Settlement brings to the Class.

9 15. My reasonable hourly rate for my billable time on this class action matter is \$630
10 per hour. The \$630 per hour rate is what is charged to and paid by my firm's hourly clients. My
11 hourly rate of \$600 per hour (at the time) was recently approved by San Diego Superior Court
12 Judge Hon. Katherine A. Bacal in *Diep et al. v. Polaris Pharmacy Services, LLC et al.*, Case No.
13 37-2024-00004618-CU-OE-CTL (final approval order dated October 10, 2025); my hourly rate
14 of \$585 per hour (at the time) was recently approved by San Diego Superior Court Judge Hon.
15 Robert C. Longstreth in *Kee et al. v. Hiossen, Inc. et al.*, Case No. 37-2019-00023035-CU-OE-
16 CTL (final approval order dated October 4, 2024); my hourly rate of \$575 per hour (at the time)
17 was recently approved by U.S. District Judge Hon. James E. Simmons, Jr. in *Bennett et al. v.*
18 *Wyndham Vacation Ownership, Inc. et al.*, Case No. 22-cv-01050 JES(BLM) (S.D. Cal.) (final
19 approval order signed on January 24, 2024); my hourly rate of \$550 (at the time) was recently
20 approved by U.S. District Judge Hon. Janis L. Sammartino in *Preston et al. v. Porch.com et al.*,
21 Case No. 21-cv-00168 JLS(BLM) (S.D. Cal.) (final approval order signed on August 12, 2022),
22 and San Diego Superior Court in a wage and hour class action settlement, *Alviz v. LHM CORP*
23 *TSD, et al.*, Case No. 37-2020-00027584-CU-OE-CTL (Final Approval granted by Hon. Carolyn
24 M. Caietti on July 8, 2022), and my hourly rate of \$525 (at the time) was recently approved by the
25 San Diego County Superior Court in a wage and hour class action settlement, *Jones v. SeaWorld*
26 *Parks & Entertainment, Inc., et al.* Case No. 37-2018-00057055-CU-OE-CTL (Judgment and
Final Approval Order signed by Hon. Eddie C. Sturgeon, dated Dec. 17, 2021).

1 16. Recent class action fee award decisions further support my proposed \$630 hourly
2 rate. *See Howell v. Advantage RN, LLC*, 2020 WL 5847565, at * 5 (S.D. Cal. Oct. 1, 2020)
3 (Sammartino, J.) [\$650 hourly rate approved for class action attorney admitted in 2002]; *Martinez*
4 *v. Berryhill*, 2017 WL 4700078, at *3 (S.D. Cal. Oct. 19, 2017) (Sammartino, J.) [approving
5 effective hourly rate of \$886.52 for counsel with sixteen years' experience and noting that the rate
6 "is on the higher end..."]; *Hose v. Washington Inventory Service, Inc.*, 2020 WL 3606404, at *8-
7 9 (S.D. Cal. July 2, 2020) [although "slightly high for the Southern District of California,"
8 \$925 hourly rate approved for 24-year partner, \$800 hourly rate approved for eleventh-year
9 associate, and \$680 hourly rate approved for sixth-year associate]; *Moreno v. Beacon Roofing*
10 *Supple, Inc.*, 2020 WL 3960481, at *7-8 (S.D. Cal. Jul. 13, 2020) (Curiel, J.) [approving hourly
11 rate of \$742 for 2002 University of San Diego School of Law graduate in connection with
12 \$230,000 settlement of wage and hour class action]; *San Diego Comic Convention v. Dan Farr*
13 *Productions*, 2019 WL 1599188, at * 13-14 (S.D. Cal. April 15, 2019) [approving hourly rate
14 of \$685 for attorney with 14 years' experience and \$545 hourly rate for attorney with 5 years'
15 experience]; *Hazlin v. Botanical Labs, Inc.* 2015 WL 11237634, at * pp. 20-22 (S.D. Cal. May
16 20, 2015) [\$650 hourly rate approved for class action attorney admitted in 2002]; *Price v. Synapse*
17 *Group, Inc.*, 2018 WL 9517269, at *2 (S.D. Cal. Sept. 24, 2018) [citing seven cases from the
18 Southern District Court of California in finding reasonable \$725 hourly rate of 31-year partner
19 and \$550 hourly rate of 12-year associate]; *Bravo v. Gale Triangle, Inc.* 2017 WL 708766, at *
20 pp. 53-56 (C.D. Cal. Feb. 16, 2017) [\$650 hourly rate approved for class action attorney admitted
in 2004].

21 17. My co-counsel's and my experience in wage and hour class actions was integral
22 in evaluating the strengths and weaknesses of the case and the reasonableness of the settlement.
23 We collectively believe this settlement is fair, reasonable and adequate. My co-counsel and I
24 believe that under the proposed Settlement, Class Members will receive substantial benefits
25 and will achieve the desired relief sought by the claims brought on behalf of the Class in the present
26 action, in the most expeditious and efficient manner practicable.

EXHIBIT “A”

Activities Export

02/23/2026

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/24/2023		Time: Work on investigation of claims and drafting of complaint; work on strategy and procedural issues; analysis and communications in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	2.30h	\$550.00	-	\$1,265.00
10/26/2023		Time: Work on complaint and strategy and procedural issues; analysis, research, and communications in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.80h	\$550.00	-	\$990.00
11/01/2023		Time: Work on investigating claims and Complaint issues; analysis.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.80h	\$550.00	-	\$440.00
11/02/2023		Time: Work on Complaint and investigation of claims; work on strategy and procedural issues: analysis and research.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.90h	\$550.00	-	\$495.00
11/03/2023		Time: Work on finalizing complaint and filing and service issues; work on strategy and investigation of claims; analysis and communications in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	3.40h	\$550.00	-	\$1,870.00
11/06/2023		Time: Work on strategy, complaint, service, and related issues; analysis and communications.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.50h	\$550.00	-	\$275.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

Activities Export

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Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/08/2023		Time: Work on complaint and investigation of claims; work on procedural issues; analysis and communications in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.20h	\$550.00	-	\$660.00
11/13/2023		Time: Work on investigation of claims; analysis.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.60h	\$550.00	-	\$330.00
11/22/2023		Time: Work on strategy, procedural issues, and PAGA and amended complaint issues; analysis and communication.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.10h	\$550.00	-	\$605.00
11/27/2023		Time: Work on joint motion to extend time to respond to complaint; work on strategy; analysis.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.60h	\$550.00	-	\$330.00
12/28/2023		Time: Work on investigation of claims; analysis.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.60h	\$550.00	-	\$330.00
01/09/2024		Time: Work on amended complaint; analysis and research; work on strategy and procedural issues,.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.80h	\$550.00	-	\$440.00
01/11/2024		Time: Work on complaint, finalize, and file; analysis and research in conjunction.	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.20h	\$550.00	-	\$660.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
● Unbilled								
01/12/2024	🕒	Time: Work on FAC, finalize and file analysis and research in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.90h	\$550.00	-	\$495.00
02/02/2024	🕒	Time: Review and analysis of Answer and Notice of Related Cases; follow-up research and analysis; communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.80h	\$585.00	-	\$468.00
02/05/2024	🕒	Time: Review and analysis of ENE Order; work on initial disclosure, strategy, and ENE issues; research and analysis and communication in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.40h	\$585.00	-	\$819.00
02/06/2024	🕒	Time: Work on strategy, related case issues, and ENE issues; analysis, research, and communication in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.10h	\$585.00	-	\$643.50
02/08/2024	🕒	Time: Work on strategy; work on ENE and related case issues; analysis, research, and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.10h	\$585.00	-	\$643.50
02/09/2024	🕒	Time: Work on strategy, related case issues, and ENE issues;	4916-010 Wage and Hour Litigation	David C. Hawkes	0.60h	\$585.00	-	\$351.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		analysis and communications in conjunction therewith. ● Unbilled	(CTG)					
02/13/2024	🕒	Time: Work on joint prosecution and strategy issues; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.80h	\$585.00	-	\$468.00
02/14/2024	🕒	Time: Work on joint prosecution and strategy issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.30h	\$585.00	-	\$175.50
02/15/2024	🕒	Time: Work on joint prosecution issues and coordination of cases issues; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.70h	\$585.00	-	\$409.50
02/29/2024	🕒	Time: Work on procedural, transfer to LA SC, joint prosecution, and strategy issues; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	2.20h	\$585.00	-	\$1,287.00
03/01/2024	🕒	Time: Work on procedural issues; analysis and communications ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.60h	\$585.00	-	\$351.00
03/04/2024	🕒	Time: Work on procedural issues and strategy; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.10h	\$585.00	-	\$643.50
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

Activities Export

02/23/2026

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Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/17/2024		Time: Work on Initial Conference issues and strategy; analysis and communications in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.40h	\$585.00	-	\$234.00
04/24/2024		Time: Work on ISC and strategy issues; analysis and communications.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.30h	\$585.00	-	\$175.50
05/10/2024		Time: Work on procedural issues, strategy, and investigation of claims; analysis and communications in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.50h	\$585.00	-	\$292.50
05/14/2024		Time: Work on strategy and procedural issues; analysis and communications in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.30h	\$585.00	-	\$175.50
06/04/2024		Time: Work on procedural and strategy issues; analysis in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.60h	\$585.00	-	\$351.00
06/20/2024		Time: Work on investigation of claims and work on strategy; analysis and research and communications in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	2.70h	\$585.00	-	\$1,579.50
06/24/2024		Time: Work on procedural, strategy, mediation, and investigation of claims issues;	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.40h	\$585.00	-	\$819.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		analysis and communications in conjunction. ● Unbilled						
06/25/2024		Time: Work on procedural and strategy issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.50h	\$585.00	-	\$292.50
07/02/2024		Time: Work on mediation and procedural issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.30h	\$585.00	-	\$175.50
07/03/2024		Time: Work on mediation and procedural issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.30h	\$585.00	-	\$175.50
07/08/2024		Time: Work on mediation and strategy issues; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.50h	\$585.00	-	\$292.50
07/24/2024		Time: Work on mediation issues; work on mediation informal data request; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.70h	\$585.00	-	\$409.50
07/25/2024		Time: Work on mediation and informal discovery issues; work on strategy and procedural issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.40h	\$585.00	-	\$234.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/17/2024		Time: Work on investigation of claims and mediation issues; work on strategy; analysis and communications.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.40h	\$585.00	-	\$234.00
10/03/2024		Time: Work on mediation and strategy issues; analysis and communications in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.40h	\$585.00	-	\$234.00
10/25/2024		Time: Work on mediation preparation; analysis and communications in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.40h	\$585.00	-	\$234.00
11/19/2024		Time: Work on mediation issues and strategy; analysis and communications in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.30h	\$585.00	-	\$175.50
02/05/2025		Time: Work on mediation preparation; analysis and communications.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.40h	\$600.00	-	\$240.00
02/10/2025		Time: Review and analysis of documents and informal data provided by Defendants for mediation; communications in conjunction.  Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	2.20h	\$600.00	-	\$1,320.00
02/11/2025		Time: Review and analysis of documents and informal data	4916-010 Wage and Hour Litigation	David C. Hawkes	1.70h	\$600.00	-	\$1,020.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		provided by Defendants for mediation; communications in conjunction. ● Unbilled	(CTG)					
02/12/2025		Time: Work on strategy and review and analysis of documents and information provided for mediation purposes; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.80h	\$600.00	-	\$480.00
02/14/2025		Time: Work on mediation preparation; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.70h	\$600.00	-	\$420.00
02/18/2025		Time: Work on mediation preparation and strategy; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.30h	\$600.00	-	\$780.00
02/19/2025		Time: Work on mediation preparation; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.30h	\$600.00	-	\$180.00
02/21/2025		Time: Work on mediation preparation; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.80h	\$600.00	-	\$480.00
02/25/2025		Time: Work on mediation preparation; analysis and communications.	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.80h	\$600.00	-	\$480.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
02/26/2025	🕒	Time: Work on mediation preparation; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.60h	\$600.00	-	\$360.00
03/04/2025	🕒	Time: Work on prep for mediation and strategy; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.80h	\$600.00	-	\$480.00
03/05/2025	🕒	Time: Work on mediation preparation; analysis and coummunications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.10h	\$600.00	-	\$660.00
03/06/2025	🕒	Time: Work on mediation preparation and strategy; analysis, research and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	3.40h	\$600.00	-	\$2,040.00
03/07/2025	🕒	Time: Work on mediation preparation; analysis and communications and research in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	3.30h	\$600.00	-	\$1,980.00
03/10/2025	🕒	Time: Work on mediation prep and strategy; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.80h	\$600.00	-	\$1,080.00
03/11/2025	🕒	Time: Work on mediation brief and	4916-010	David C.	3.40h	\$600.00	-	\$2,040.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		mediation preparation; analysis, research, and communication in conjunction therewith. ● Unbilled	Wage and Hour Litigation (CTG)	Hawkes				
03/13/2025	🕒	Time: Work on mediation prep.; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.70h	\$600.00	-	\$420.00
03/17/2025	🕒	Time: Prepare for mediation; analysis in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	3.30h	\$600.00	-	\$1,980.00
03/18/2025	🕒	Time: Prepare for and attend all-day mediation with Lynn Frank; follow-up work on settlement issues and agreement drafting; communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	10.20h	\$600.00	-	\$6,120.00
03/19/2025	🕒	Time: Work on settlement issues; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.60h	\$600.00	-	\$960.00
03/20/2025	🕒	Time: Work on settlement issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.10h	\$600.00	-	\$660.00
03/21/2025	🕒	Time: Work on settlement issues; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.60h	\$600.00	-	\$360.00
03/27/2025	🕒	Time: Work on settlement issues;	4916-010	David C.	0.60h	\$600.00	-	\$360.00
					94.00h		\$0.00	\$55,248.50
							0.00h	94.00h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		analysis and communications. ● Unbilled	Wage and Hour Litigation (CTG)	Hawkes				
04/01/2025		Time: Work on settlement agreement and related issues; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.60h	\$600.00	-	\$360.00
04/03/2025		Time: Work on class action settlement agreement and supporting documents and related issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.80h	\$600.00	-	\$480.00
04/14/2025		Time: Work on class action settlement agreement and supporting documents and related issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.80h	\$600.00	-	\$480.00
05/14/2025		Time: Work on settlement agreement and preliminary approval issues; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.50h	\$600.00	-	\$300.00
05/16/2025		Time: Work on settlement issues; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.60h	\$600.00	-	\$360.00
05/20/2025		Time: Work on settlement	4916-010	David C.	0.30h	\$600.00	-	\$180.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		agreement and related issues; analysis and communications in conjunction. ● Unbilled	Wage and Hour Litigation (CTG)	Hawkes				
06/03/2025	🕒	Time: Work on settlement issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.50h	\$600.00	-	\$300.00
06/06/2025	🕒	Time: Work on settlement agreement issues and strategy; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.60h	\$600.00	-	\$360.00
06/13/2025	🕒	Time: Work on settlement issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.50h	\$600.00	-	\$300.00
07/02/2025	🕒	Time: Work on preliminary approval issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.40h	\$600.00	-	\$240.00
07/03/2025	🕒	Time: Work on preliminary approval issues; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.40h	\$600.00	-	\$240.00
07/08/2025	🕒	Time: Review and analysis of preliminary approval motion and supporting documents; analysis and communications; work on strategy. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.80h	\$600.00	-	\$480.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/10/2025	  Unbilled	Time: Work on mediation preparation and pre-mediation disclosures; Telephone conference with Wilson counsel; analysis and communications in conjunction.	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.30h	\$600.00	-	\$780.00
07/22/2025	  Unbilled	Time: Work on PA issues; analysis and communication.	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.80h	\$600.00	-	\$480.00
08/05/2025	  Unbilled	Time: Work on settlement issues; analysis and communications.	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.40h	\$600.00	-	\$240.00
08/07/2025	  Unbilled	Time: Work on settlement issues; analysis and communications.	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.20h	\$600.00	-	\$120.00
08/11/2025	  Unbilled	Time: Work on settlement issues; analysis and communications.	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.20h	\$600.00	-	\$120.00
08/18/2025	  Unbilled	Time: Work on preliminary approval documents and issues; submit documents to LWDA; analysis and communications.	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.90h	\$600.00	-	\$540.00
08/19/2025	  Unbilled	Time: Work on preliminary approval issues; analysis and communications.	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.40h	\$600.00	-	\$240.00
08/21/2025		Time: Work on preliminary	4916-010	David C.	0.40h	\$600.00	-	\$240.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		approval issues; analysis and communications. ● Unbilled	Wage and Hour Litigation (CTG)	Hawkes				
10/27/2025	🕒	Work on preliminary approval issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.30h	\$600.00	-	\$180.00
10/30/2025	🕒	Work on preliminary approval issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.30h	\$600.00	-	\$180.00
11/06/2025	🕒	Work on preliminary approval and settlement administration issues; analysis and communications in conjunction. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.60h	\$600.00	-	\$360.00
11/07/2025	🕒	Work on settlement administration issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.40h	\$600.00	-	\$240.00
11/17/2025	🕒	Work on settlement admin issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.30h	\$600.00	-	\$180.00
01/01/2026	🕒	Work on settlement admin issues; analysis and communications. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.20h	\$600.00	-	\$120.00
01/02/2026	🕒	Work on settlement admin issues; analysis and communications.	4916-010 Wage and Hour Litigation	David C. Hawkes	0.10h	\$600.00	-	\$60.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Unbilled	(CTG)					
01/14/2026		Work on settlement administration issues; analysis and communications. Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.30h	\$600.00	-	\$180.00
01/15/2026		Work on settlement admin issues; analysis and communications. Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.20h	\$600.00	-	\$120.00
01/29/2026		Work on settlement administration issues; analysis and communications. Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.40h	\$600.00	-	\$240.00
01/30/2026		Work on settlement admin; analysis and communications. Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	0.20h	\$600.00	-	\$120.00
					94.00h		\$0.00 0.00h	\$55,248.50 94.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/03/2025		Mediation Expenses - Lynn S. Frank ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	Sheri Klein Geldert	1.00	\$4,950.00	-	\$4,950.00
06/25/2024		Filing Fee for Notice of Appearance. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.00	\$30.01	-	\$30.01
11/14/2023		Service of Process - AT&T Mobility Services LLC - Summons in a Civil Action; Complaint; Civil Cover Sheet ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	Mary Johnson	1.00	\$305.85	-	\$305.85
11/03/2023		Filing Fee for Complaint. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.00	\$402.00	-	\$402.00
11/03/2023		PAGA Claim Notice Filing. ● Unbilled	4916-010 Wage and Hour Litigation (CTG)	David C. Hawkes	1.00	\$75.00	-	\$75.00
							\$0.00 0.00h	\$5,762.86 0.00h