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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 A. HUCH
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 A. Huch, 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
6 own 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
11 recovery. Plaintiff's counsel therefore estimate that even if the Class was 100% successful at
12 every stage of future litigation, Class members would not receive any relief until at least 2027,
13 and possibly 2028 or 2029. Thus, the proposed Settlement confers significant and timely relief
14 to the Class without further delay by eliminating the substantial risk of the Class not achieving
15 certification and/or 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. In addition to significant costs and lost
19 opportunities with other matters, and the risks taken by accepting this case on a contingency
20 basis, this case involved approximately 162.3 attorney hours of my time.

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

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

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

10 7. I am a 2002 graduate of the University of San Diego School of Law and was
11 admitted to the California Bar during December 2002. I began my legal career working as in-
12 house counsel at the Sempra Energy Law Dept., in which I was assigned complex antitrust,
13 regulatory and civil litigation matters. While at Sempra Energy, I worked closely with outside
14 counsel at Gibson Dunn & Crutcher on the *Natural Gas Anti-Trust Cases I, II, III and IV*, JCCP
15 Nos. 4221, 4224, 4226, and 4228, in San Diego County Superior Court (Hon. Ronald S. Prager).
16 As a sole practitioner, I successfully litigated a \$50 million false advertising settlement with JC
17 Penney. See *Spann v. J.C. Penney Corp.* (C.D. Cal. 2016) 211 F.Supp.3d 1244 (order granting
18 final approval of class action settlement); *Spann v. J.C. Penney Corp.* (C.D. Cal. 2015) 307
F.R.D. 508 (order granting class certification).

19 8. I am admitted to practice before the United States District Courts,
20 Southern/Central/Northern Districts of California, United States Court of Appeals for the Ninth
21 Circuit, and all California State Courts. Over the past twenty years, I have been appointed
22 class counsel for a certified class on more than thirty class actions in San Diego County
23 Superior Court; United States District Court, Southern District of California; United States
24 District Court, Central District of California; Los Angeles County Superior Court; Orange
25 County Superior Court; and Riverside County Superior Court. While employed in San Diego
26 County during years 2007 and 2008, I was listed as one of the "Top Attorneys" by the San

1 Diego Daily Transcript. This rating system by my peers in San Diego County rated placed me
2 as one of the top 50 consumer and employment litigation attorneys in all of San Diego County,
3 in the company of senior partners from national law firms Latham & Watkins LLP, Cooley
4 Godward Kronish LLP and Allen Matkins *et al.* LLP. Recently, I successfully argued an appeal
5 before the California Court of Appeal, Fourth District, Division 1, in a complex wage and hour
6 class action (*Sellers v. World Financial Group, Inc.*, Case No. D078934, filed June 23, 2022,
7 unpublished: 2022 WL 2254998).

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

19 10. My work product in the *Louka* action that was filed in the Southern District of
20 California on November 2, 2023 was utilized in the instant litigation and my time spent on the
21 Southern District of California action was "inextricably linked" to the issues raised in the
22 present litigation. See *Gulfstream III Assocs., Inc. v. Gulfstream Aerospace Corp.* (3d Cir. 1993)
23 995 F.2d 414, 420; *Harman v. City & Cnty. of San Francisco* (2007) 158 Cal.App.4th 407, 417.
24 For example, in the originally filed *Louka* action in the Southern District of California, my co-
25 counsel and I investigated, discovered and developed a specific theory of liability regarding
26 AT&T retail employees routinely working off the clock, as documented in Defendant's own
27 written policies:

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

11. 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
Amended Class Action Complaint upon Plaintiff Louka's addition as a party plaintiff and
proposed class representative in this matter. (See First Amended Class Action Complaint, filed
June 14, 2024, ¶¶ 5, 16.) This detailed off-the-clock theory, originally alleged by Plaintiff Louka

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

11 12. As demonstrated in my attached billing records, which are attached hereto as
12 **Exhibit "A,"** I have accrued 162.3 hours of billable time throughout the course of the present
13 class action and PAGA litigation. My total Lodestar fee amount (reasonable accrued hours
14 multiplied by reasonable hourly rate) is therefore \$105,495.00 (162.3 hours x \$650 per hour). I
15 expect my Lodestar to increase with attendance at the final approval hearing and subsequent
16 execution of the settlement terms.

17 13. My work on the present action can be roughly categorized into thirteen main
18 categories: (1) pre-filing investigation and research; (2) drafting of pleadings and amendments;
19 (3) drafting comprehensive written discovery, including requests for production of documents,
20 special interrogatories, and form interrogatories; (4) meeting and conferring with Defense
21 counsel regarding disputed discovery issues; (5) analyzing electronic payroll records, and
22 written corporate policies, manuals and training materials; (6) drafting mediation brief and
23 damages analysis; (7) reviewing Defendants' briefing and creating a reasonable mediation
24 demand; (8) engaging in a full-day mediation; (9) attending various court hearings; (10)
25 preparing appropriate settlement documents, including the Settlement and Class Notice; (11)
26 and drafting the motion for preliminary approval and class notice; (12) drafting the motion for
27 final approval of the class action settlement; and (13) working with settlement administrator to

1 assist in the administration of the settlement, including reviewing and editing the mailing proof
2 for the class notice, reviewing the class data, reviewing a spreadsheet of proposed individual
3 settlement amounts based upon the formula set forth in the settlement agreement and reviewing
4 the calculations and deductions from the gross settlement amount in order to determine the net
5 settlement amount to be distributed to the members of the Class.

6 14. My reasonable hourly rate for my billable time on this class action matter is
7 \$650 per hour. My hourly rate was recently approved in similar federal and state class actions,
8 including in 2024 by the Hon. James E. Simmons, Jr., United States District Court Judge for the
9 Southern District of California. *Bennett v. Wyndham Vacation Ownership, Inc.*, No. 22-CV-
10 1050 JES (BLM) (S.D. Cal. Jan. 25, 2024), Order and Judgment Granting Final Approval of
11 Class Action Settlement.

12 15. More than three years ago, on Aug. 12, 2022, my \$650 hourly rate was
13 approved in another wage and hour class action in the Southern District of California, *Preston v.*
14 *Porch.com, Inc., et al.*, Case No. 21CV168-JLS(BLM) (Final Approval Order signed by Hon.
15 Janis L. Sammartino, ECF No. 40). My \$650 hourly rate was also approved by the San Diego
16 County Superior Court in yet another wage and hour class action, *Jones v. SeaWorld Parks &*
17 *Entertainment, Inc., et al.* Case No. 37-2018-00057055-CU-OE-CTL (Judgment and Final
18 Approval Order signed by Hon. Eddie C. Sturgeon, dated Dec. 17, 2021). My hourly rate was
19 also approved by the Los Angeles County Superior Court, Complex Division in *Wells Fargo*
20 *Wage & Hour Cases*, Judicial Council Coordinated Case Number JCCP 4702 (Judgment and
21 Final Approval Order signed by the Hon. Kenneth R. Freeman, dated May 14, 2018).

22 16. In years 2009 through 2012, The National Law Journal conducted several law
23 firm surveys with respect to attorney billing rates in major U.S. cities. According to the surveys,
24 the market rate for an attorney of my experience and capability in major California markets,
25 such as Southern California, is at least \$650 per hour. I have successfully litigated two previous
26 class action matters in California during years 2009 through 2016 in which the law firm of
SHEPPARD, MULLIN, RICHTER & HAMPTON was retained as Defense counsel (Spann v.

JC Penney Corp., Inc., U.S. Dist. Ct., C.D. Cal. Case No. SACV12-0215 FMO (KESx); and Nguyen v. MinuteClinic, LLC, et al., Los Angeles County Superior Court Case No. BC432834). My hourly rate at \$650 is on par with the high hourly rate charged by an associate at SHEPPARD, MULLIN, RICHTER & HAMPTON in 2011.

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

18. My co-counsel's and my experience in wage and hour class actions was integral in evaluating the strengths and weaknesses of the case and the reasonableness of the settlement.

1 We collectively believe this settlement is fair, reasonable and adequate. My co-counsel and I
2 believe that under the proposed Settlement, Class Members will receive substantial benefits
3 and will achieve the desired relief sought by the claims brought on behalf of the Class in the
4 present action, in the most expeditious and efficient manner practicable.

5 19. In light of my evaluation of the maximum amount that could be
6 recovered through trial and the significant risks and delays of further litigation, I
7 believe that the Settlement is fair reasonable, and adequate, and in the best interest of the
8 proposed class.

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

11 Executed this 24th day of February 2026 at Rancho Cucamonga, California.

12 David A. Huch

13 David A. Huch
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EXHIBIT "A"

(Law Office of David A. Huch Billing Records)

ATT CLASS LITIGATION (Louka, Gilbert, et al.)

David A. Huch - Time Sheet

<u>DATE</u>	<u>HOURS</u>	<u>ATTY.</u>	<u>ACTIVITY</u>
10/9/2023	0.3	Huch	Review email from BKF regarding potential new case
10/11/2023	1.6	Huch	prepare for meeting w/ potential client Marvin Louka
10/11/2023	0.8	Huch	teleconf. With Louka
10/12/2023	2.4	Huch	review Louka's personnel file including 2022/23 pay stubs
10/12/2023	1.2	Huch	teleconf. With BKF re potential claims and fee sharing
10/13/2023	2.4	Huch	review SEC filings, financial news and news articles re AT&T retail
10/16/2023	0.8	Huch	teleconf. w/ BKF re FLSA applicability
10/18/2023	1.7	Huch	research recent PAGA trends
10/18/2023	0.7	Huch	research recent trends - FLSA, including filing concurrently w/ state law claims
10/18/2023	2.2	Huch	review AT&T collective bargaining agreement w/ communication workers
10/18/2023	1.7	Huch	research NLRA trends
10/19/2023	1.6	Huch	research off-the-clock trends / Troester and similar authority
10/19/2023	0.8	Huch	draft public records request re Cal. Bureau Labor Statistics issue
10/23/2023	1.6	Huch	review DIR filings - AT&T - CA based, non-exempts
10/25/2023	1.8	Huch	research recent wage&hour trends - overtime rates, meal period rates, etc.
10/26/2023	1.5	Huch	review of client's employment file and DLSE filings
10/26/2023	4.3	Huch	initial drafting of complaint and PAGA Notice
10/27/2023	2.6	Huch	review client screenshots and AT&T Pre/Post Shift docs
10/30/2023	1.1	Huch	teleconf. w/ BKF re initial complaint and causes of action
10/31/2023	2.3	Huch	research recent trends in scope of class re subclass issues
10/31/2023	1.3	Huch	teleconf. w/ BKF re subclass issues and class definitions
11/1/2023	2.4	Huch	revise Complaint - final version for filing (25 pp.)
11/27/2023	0.8	Huch	review and revise Joint Motion to continue deadline respond to complaint
1/2/2024	2.7	Huch	Draft First Amended Class Action Complaint w/ PAGA
2/2/2024	2.1	Huch	Review Defendant's Answer - federal court (42 Affirmative Defenses)
2/5/2024	1.1	Huch	review Magistrate Judge Berg's ENE and CMC Order
2/5/2024	0.8	Huch	review Judge Huie's Civil case management procedures
2/5/2024	1.7	Huch	research Judge Huie rulings (PACER, WL, TRELIS) and POTUS/Senate confirm.
2/5/2024	1.2	Huch	review Magistrate Judge Crawford's Chambers Rules - Civil Cases
2/5/2024	1.6	Huch	teleconf. w/ BKF re related cases
2/5/2024	1.2	Huch	research latest trends - FRCP 16(b)
2/5/2024	1.5	Huch	research law re client's potential retaliation claims
2/6/2024	3.1	Huch	Draft ENE Conf. Brief (Confidential)
2/13/2024	0.6	Huch	draft email to client re potential retaliation claims
2/20/2024	1.2	Huch	Email to LA Superior Crt. Counsel re Joint Prosecution
2/21/2024	0.8	Huch	Call w/ defense counsel re consolidating with LA case
2/29/2024	0.6	Huch	draft Proposed Order to Dismiss Action - S.D. Cal.
2/29/2024	1.1	Huch	Draft Joint Motion to Dismiss Claims
3/1/2024	1.6	Huch	review prior RAZO class settlement and release and related filings
3/2/2024	2.1	Huch	review updated Store Opening and Closing Procedures - client
3/2/2024	1.6	Huch	discuss new opening/closing procedures with Client
3/3/2024	0.5	Huch	review email from defense counsel re RAZO and GALEN class settlements
3/3/2024	1.8	Huch	research class-wide release and collateral estoppel issues
3/8/2024	1.3	Huch	review Gilbert Initial Status Conf. Scheduling Order - April 19 2024 hearing
3/8/2024	0.8	Huch	draft and review emails to/from Gilbert Counsel re Status. Conf.
4/20/2024	0.9	Huch	Review Case Management Order post hearing

ATT CLASS LITIGATION (Louka, Gilbert, et al.)

David A. Huch - Time Sheet

<u>DATE</u>	<u>HOURS</u>	<u>ATTY.</u>	<u>ACTIVITY</u>
5/17/2024	0.7	Huch	review/revise Joint Motion for leave to file F.A.C.
5/17/2024	1.6	Huch	review/revise First Amended Class Action Complaint
6/14/2024	0.5	Huch	draft and file Notice of Appearance
7/15/2024	1.2	Huch	review Defendant's Answer to F.A.C.
7/23/2024	2.3	Huch	draft pre-mediation disclosure items
7/24/2024	0.5	Huch	review and revise pre-mediation disclosure list
8/2/2024	1.4	Huch	Research and discuss mediators including Frank, Marlin, Rotman etc
2/20/2025	2.3	Huch	review and take notes on Bates 0001-000225
2/21/2025	1.9	Huch	review and take notes on Bates 000225-000503
2/24/2025	2.1	Huch	review and take notes on Bates 00504-000802
2/25/2025	1.8	Huch	review and take notes on Bates 00803-001102
2/26/2025	1.5	Huch	review and take notes on Bates 001103-001485
2/27/2025	2.4	Huch	review and take notes on Bates 0001486-002000
3/3/2025	2.5	Huch	review and take notes on Bates 0002001-0002456
3/4/2025	3.2	Huch	review and take notes on Bates 0002457-003102
3/5/2025	1.6	Huch	review and take notes on Bates 0003103-0003745
3/6/2025	2.2	Huch	review and take notes on Bates 0003745-0004156
3/7/2025	1.3	Huch	research meal/rest break law related to defense policies
3/7/2025	1.8	Huch	Review analysis of Plaintiffs' Time Records
3/10/2025	1.2	Huch	prepare exhibits for mediation brief via Adobe Pro
3/10/2025	3.1	Huch	Draft plaintiff Louka's content for mediation brief
3/11/2025	0.9	Huch	review mediation brief revisions (BKF) and highlight exhibits
3/11/2025	0.8	Huch	review co-counsel's content in mediation brief draft
3/12/2025	1.2	Huch	review and respond to defense counsel's email re class-wide data
3/12/2025	1.4	Huch	call w/ co-counsel re defense disclosures and data
3/18/2025	8.3	Huch	prepare for and attend mediation with Lynn Frank
3/18/2025	2.1	Huch	review and revise draft settlement agreement and class notice from defense
3/18/2025	0.7	Huch	speak with client re settlement terms
3/19/2025	2.4	Huch	revise settlement and class notice
3/21/2025	0.4	Huch	prepare settlement for signature and speak w/ client re DocuSign
4/1/2025	1.7	Huch	review Revised Settlement Agreement [LA plaintiff dropped out]
5/14/2025	1.9	Huch	review Second Amended Complaint
8/13/2025	3.1	Huch	draft my Motion for Prelim Approval sections, my Decl. and Louka Decl.
8/14/2025	1.4	Huch	review edits to prelim approval motion
8/15/2025	0.8	Huch	review and revise Proposed Order Granting Prelim. Approval
8/16/2025	0.7	Huch	answer Plaintiffs' questions re prelim approval filings
8/19/2025	2.1	Huch	review all ten court filings re prelim approval
10/27/2025	0.1	Huch	review Oct. 27, 2025 Minute Order
10/27/2025	0.8	Huch	draft revised Prelim. Approval Order
10/30/2025	0.6	Huch	review Joint Stipulation re Class Action and PAGA Settlement
2/9/2026	2.5	Huch	research recent trends in attorneys fees, costs and class rep. service awards
2/10/2026	0.7	Huch	review notice and Points & Authorities in support of Final Approval
2/11/2026	1.7	Huch	draft Declaration in support of Final Approval
2/12/2026	1.3	Huch	draft Louka decl. in support of final approval
2/13/2025	1.2	Huch	review and revise Hawkes Decl. in support of final approval
2/14/2025	1.8	Huch	review and revise Points and authorities re mtn. for attys. fees, costs, class rep.

ATT CLASS LITIGATION (Louka, Gilbert, et al.)

David A. Huch - Time Sheet

<u>DATE</u>	<u>HOURS</u>	<u>ATTY.</u>	<u>ACTIVITY</u>
2/18/2025	1.1	Huch	review Defense Counsel email re escalator clause being triggered
2/18/2025	0.7	Huch	consult w/ co-counsel re Defense escalator clause projections
2/19/2025	0.8	Huch	gather and prepare exhibits in support of mtn. for attys. fees, costs, class rep.
2/19/2025	0.5	Huch	review email from Admin. Re escalator clause numbers
2/20/2025	0.4	Huch	review final Project Status Report from admin.
2/24/2025	1.6	Huch	review updated case law re hourly rates
2/24/2025	1.1	Huch	research re service awards
2/24/2025	0.7	Huch	review email from client re other class members' estimates and reactions
TOTAL	162.3		