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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF FRESNO

DOMINIQUE CHAPARRO, individually, and
on behalf of all others similarly situated,

Plaintiff,

v.

CADENCE SL WINDHAM FRESNO, LLC; a
Delaware limited liability company; and DOES 1
through 10, inclusive,

Defendants.

Case No.: 23CECG03064

Assigned for all purposes to:
Hon. Jon M. Skiles
Dept. 503

**DECLARATION OF JOHN G. YSLAS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

FINAL APPROVAL HEARING

Date: February 5, 2026

Time: 3:30 p.m.

Dept: 503

DECLARATION OF JOHN G. YSLAS

I, John G. Yslas, declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a Senior Partner at Wilshire Law Firm, PLC (“WLF”), counsel of record for plaintiff Dominique Chaparro (“Plaintiff”). I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I submit this declaration in support of Plaintiff’s Motion for Final Approval of Class Action and PAGA Settlement.

3. Plaintiff is represented by WLF. The attorneys at WLF performed significant work and expended litigation costs in prosecuting this matter with no guarantee of payment.

4. WLF was selected by Best Lawyers and U.S. News & World Report as one of the nation’s Best Law Firms since 2020 and is comprised of more than 100 attorneys and over 600 employees. WLF is actively and continuously practicing in employment litigation, representing employees in both individual and class actions in both state and federal courts throughout California.

5. WLF is qualified to handle this Litigation because its attorneys are experienced in litigating Labor Code violations in individual, class action, and representative action cases. WLF has handled, and is currently handling, numerous wage and hour class action lawsuits, as well as class actions involving consumer rights and data privacy litigation.

6. I graduated from the University of California, Santa Barbara with High Honors in 1991 with Bachelor of Arts degrees in Psychology. I received my Juris Doctor from UCLA Law School in 1996.

7. Upon graduating from law school in 1996, I worked for a boutique law firm practicing general litigation which included employment law matters. Since 2000 (that is, the last 25 years) my practice has been exclusively focused on labor and employment matters including handling wage and hour class, collective and representative actions (including the

1 California Private Attorneys General Act, or “PAGA”), including in the international law firms
2 of Morgan, Lewis & Bockius LLP (where I was a senior associate), Foley & Lardner LLP
3 (where I was a partner and a national Vice Chair of the Labor and Employment Group), Norton
4 Rose Fulbright LLP (where I was a partner) and Seyfarth Shaw LLP (where I was a partner and
5 member of the Wage and Hour Practice Group). During my time at these law firms, I was the
6 primary attorney or took a major leading role in defending employers on numerous wage and
7 hour class, collective and representative actions.

8 8. In late June 2022 I left Seyfarth Shaw LLP and joined my current firm, Wilshire
9 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
10 hour class and representative actions litigating such matters on behalf of plaintiff employees in
11 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
12 defendants, I have successfully mediated the resolution of many wage and hour class,
13 collective, and representative actions. Just since starting to settle cases in late April 2023 I have
14 already successfully mediated matters in which I have been counsel or co-counsel resulting in
15 **well over \$200 million** in settlements and verdicts which are in the process of being finalized,
16 and with numerous upcoming mediations scheduled. In those and numerous other matters, I
17 have managed and assisted with the litigation and settlement of many wage and hour PAGA
18 and class actions. In those actions, I performed similar tasks as those performed in the course
19 of prosecuting this action. Indeed, I recently tried and prevailed in achieving a jury verdict in
20 a wage and hour class action in the matter of *Aguilar-Flores v. Javier’s – CC LLC*, Los Angeles
21 County Superior Court, Case No. 19STCV36438 (settled after verdict).

22 9. I have received numerous awards for my legal work. For example, from 2015 to
23 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson
24 Reuters). I have also served on numerous prominent boards and in other leadership positions,
25 including serving as Southern California Regional President for the Hispanic National Bar
26 Association and on the board of directors of the Mexican American Bar Foundation. I also
27 previously served on the 5-member Los Angeles Civil Service Commission, which generally
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1 oversees the personnel decisions for the City of Los Angeles.

2 10. I have also published numerous blogs on labor and employment issues including
3 on wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-
4 Impact on Class Action Litigation” (while a partner with Foley & Lardner LLP) and “Are You
5 Really Protected From Wage-and-Hour Successor Liability in an Asset Purchase” (while a
6 partner with Seyfarth Shaw LLP). I have also been a presenter at numerous conferences,
7 including being a presenter involving the “Employment Law Update” at a National
8 Employment Law Council conference. I currently bill at an hourly rate of \$1,500.00.

9 11. Jeffrey C. Bils is an eleventh-year Senior Attorney at WLF. He graduated from
10 the University of Wisconsin–Madison with a Bachelor of Arts in Journalism and German, and
11 received his Juris Doctor from the University of California, Los Angeles School of Law in 2014.
12 During law school, he was a Senior Editor on the UCLA Law Review and an Articles Editor
13 on the Entertainment Law Review. Mr. Bils served as a Judicial Extern for the Hon. Consuelo
14 Bland Marshall in United States District Court for the Central District of California, and also
15 for the Hon. Sandra R. Klein of United States Bankruptcy Court for the Central District of
16 California. Mr. Bils graduated ranked No. 7 in his graduating class from UCLA School of Law.
17 He was admitted to practice law in the State of California in 2014. Since graduating from law
18 school, he has focused his legal work primarily on employment matters, including wage-and-
19 hour class action and PAGA representative action litigation, and he has helped obtain dozens
20 of settlements on behalf California workers, as well as on behalf of California employers during
21 his years on the defense bar. Mr. Bils is a member of the Beverly Hills Bar Association
22 (BHBA), where he is a past member of the Board of Governors and a past Chair of the Labor
23 & Employment Law Section Executive Committee. He is also a member of the California
24 Employment Lawyers Association (CELA) and the Consumer Attorneys Association of Los
25 Angeles (CAALA). Mr. Bils currently bills at an hourly rate of \$850.00.

26 12. Diego Aviles is a Junior Partner at Wilshire Law Firm. He graduated from the
27 University of California, Irvine, with a Bachelor of Arts in Political Science as well as a
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1 Bachelor of Arts in Criminology, Law, and Society, and received his Juris Doctor from the
2 Santa Clara University School of Law in 2015. During law school, Mr. Aviles was President
3 for the Santa Clara Employment Law Society, Board Member of the Honors Moot Court, and
4 President of the Santa Clara University La Raza Chapter. He clerked for the Equal Employment
5 Opportunity Commission in San Francisco, California, and also worked with the Workers'
6 Rights Clinic in San Jose, California, among other employment law firms. He was admitted to
7 practice law in the State of California in 2017. Since graduating from law school, he has
8 focused his legal work exclusively on employment matters, including wage-and-hour class
9 action and PAGA representative action litigation, and he has helped obtain dozens of
10 settlements on behalf California workers. He has been appointed Class Counsel numerous
11 times in California and most recently achieved a published California Appellate opinion in the
12 matter of *Alberto v. Cambrian Homecare, et al.*, 91 Cal.App.5th 482 regarding employment
13 arbitration agreements. He has also been a member of the California Employment Lawyers
14 Association (CELA) since at least 2019. Mr. Aviles' currently bills at an hourly rate of \$800.00.

15 13. Aram Boyadjian was a fifth-year Associate Attorney at WLF. He was admitted
16 to practice law in the State of California in 2021. Mr. Boyadjian graduated from the University
17 of California, Los Angeles, with a Bachelor of Arts in Political Science. He received his Juris
18 Doctor from Loyola Law School. During law school, he was a member of the student editorial
19 board for the International and Comparative Law Review. Since January 2021, his practice has
20 mainly been focused on wage and hour class action litigation. Mr. Boyadjian billed at an hourly
21 rate of \$600.00.

22 14. Harry Erganyan is an Associate Attorney at Wilshire Law Firm, PLC. He was
23 admitted to practice law in the State of California in 2021. Mr. Erganyan graduated from Loyola
24 Marymount University, with a Bachelor of Arts in Political Science. He received his Juris
25 Doctor from Southwestern Law School. During law school, he externed for the Los Angeles
26 City Attorney. Since January 2021, Mr. Erganyan' practice has been focused on wage and hour
27 class action litigation. Mr. Erganyan currently bills at an hourly rate of \$600.00.

1 15. Mariam Nazaretyan is an Associate Attorney at Wilshire Law firm, PLC. She
2 was admitted to practice law in the State of California in 2021. Ms. Nazaretyan graduated from
3 Loyola Marymount University with a Bachelor of Arts in Political Science. She received her
4 Juris Doctor from Southwestern Law School. During law school, she was a student editor for
5 the Journal of International Media and Entertainment Law and secretary of the Student Bar
6 Association. Since graduating, Ms. Nazaretyan's practice has been focused on international
7 humanitarian law and employment law. Ms. Nazaretyan currently bills at an hourly rate of
8 \$600.00.

9 16. Lisa B. Iturriaga is a Settlement Attorney at Wilshire Law Firm, PLC. She was
10 admitted to practice law in the State of California in 2021. Ms. Iturriaga graduated from
11 University of South Florida with a Bachelor of Science in Finance and a Bachelor of Arts in
12 Marketing. She received her Juris Doctor from Chapman University Dale E. Fowler School of
13 Law. Since graduating, her practice has been in insurance defense (previously) and
14 employment law (currently). Since 2023, she has exclusively worked on Plaintiff-side wage
15 and hour cases. Ms. Iturriaga is also a member of the California Employment Lawyers
16 Association (CELA). Ms. Iturriaga currently bills at an hourly rate of \$550.00.

17 17. Andrew Sandoval was a third-year Associate Attorney at WLF. He was admitted
18 to practice law in the State of California in 2022. Mr. Sandoval graduated from Azusa Pacific
19 University with a Bachelor of Arts in Economics. He received his Juris Doctor from Loyola
20 Law School. During law school, he was a Vice-President of La Raza de Loyola. Since
21 graduating, his practice has mainly been focused on wage and hour class action litigation. Mr.
22 Sandoval billed at an hourly rate of \$500.00.

23 18. WLF's hourly rates are comparable to those charged by other class action
24 plaintiffs' counsel and the firms defending class actions. WLF's hourly rates have been
25 approved by other courts in California in which WLF was approved as Class Counsel. *See, e.g.,*
26 *Matthew Veliz v. DrinkPak, LLC*, Los Angeles County Superior Court, Case No.
27 *22STCV37384*, *Ismael Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter County
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1 Superior Court, Case No. CVCS22-0002261; *Jessica Bronsal v. PTI Technologies Inc.*,
2 Ventura County Superior Court, Case No. 202200570361CUOE; *Miguel A. Vigil Ruiz v. The*
3 *De Ruosi Group, LLC*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2022-
4 8780; *Gutierrez v. Top Drawer Merch, LLC et al*, Los Angeles County Superior Court, Case
5 No. 23STCV04299; *Wing v. Road Machinery, LLC et al*, Kern County Superior Court, Case
6 No. BCV-22-102896; *Hernandez v. SGPS Showrig Los Angeles, Inc.*, Los Angeles County
7 Superior Court, Case No. 22STCV28155; *Azevedo v. Tulare Nursing & Rehabilitation*
8 *Hospital, Inc.*, Tulare County Superior Court, Case No. VCU293325; *Haser v. Universal Chain*
9 *of California, Inc.*, Sacramento County Superior Court, Case No. 34-2022-00332268; *Caldera*
10 *v. Performance Online, Inc. et al*, Riverside County Superior Court, Case No. CVRI2306013;
11 *Goosby v. CiminoCare, Inc.*, Sacramento County Superior Court, Case No. 34-2022-00329033;
12 *Rooks v. Hot Cakes Restaurant Group, Inc.*, San Joaquin County Superior Court, Case No.
13 STK-CV-UOE-2022-11056; *Garcia v. Compassionate Heart*, Orange County Superior Court,
14 Case No. 30-2022-01294409-CU-OE-CXC; *Parra v. Citrus Valley Management Services, Inc.*,
15 Riverside County Superior Court, Case No. CVRI2301768; *Torres v. HomeShield Pest Control*
16 *Inc.*, Placer County Superior Court, Case No. S-CV-0049525; *Cabrera v. Creekside Auto*
17 *Group*, Santa Clara County Superior Court, Case No. 23CV415661; *Simpson v. Arcos*,
18 Riverside Superior Court, Case No. CVRI2303337; *Payne v. Planned Parenthood: Shasta-*
19 *Diablo, Inc.*, San Francisco County Superior Court, Case No. CGC-23-607359; *Turner v.*
20 *Northrop*, Central District of California, No. 2:23-cv-03756 PA (PDx). The total hours
21 expended on this action are reasonable and in line with comparable cases.

22 19. WLF has performed significant work and incurred litigation costs in prosecuting
23 this matter with no guarantee of any payment. The efforts expended by Plaintiff's counsel to
24 achieve this result include, but are not limited to, the following:

25 a. the investigation of the matter, including meeting with Plaintiff, reviewing
26 Defendant's policies, and requesting and reviewing Plaintiff's time and pay records, personnel
27 files, and exploring the corporate structure of Defendant;

- b. filing the Action;
- c. drafting and filing the First Amended Complaint;
- d. attending status conferences and meeting and conferring with Defendant regarding the case;
- e. meeting and conferring with Defendant regarding mediation, exchange of informal discovery beforehand, and negotiating with opposing counsel regarding the parameters thereof;
- f. selecting a mediator and mediation date;
- g. working with opposing counsel and expert consultants for the receipt of a representative sampling and analyzing the same with the aid of expert consultants and Plaintiff to perform analyses of liability and exposure prior to attendance of the mediation in this matter;
- h. reviewing policy documents from Defendant and researching applicable defenses;
- i. preparation of the mediation brief and damages model for use at mediation;
- j. attendance at the mediations by all Parties and Counsel;
- k. communicating with Plaintiff who requested updates or other information regarding this matter;
- l. negotiating, finalizing and fully executing the settlement agreement;
- m. preparing and filing the Motion for Preliminary Approval and supporting documents;
- n. attending the hearings on Motion for Preliminary Approval;
- o. reviewing Court's tentative rulings;
- p. preparing and filing the Amended Motion for Preliminary Approval and supporting documents;
- q. communicating with opposing counsel and the Settlement Administrator to ensure class notice is completed; and
- r. preparing the instant Motion for Final Approval and supporting documents.

20. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with **226.8 hours** of work resulting in **\$196,095.00** in fees. The true and correct copies of WLF's detailed billing in this matter are attached hereto as **Exhibit 1**.

The chart below shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
Andrew Sandoval	0.8	\$500.00	\$400.00
Jeffrey C. Bils	1.1	\$850.00	\$935.00
Aram Boyadjian	1.9	\$600.00	\$1,140.00
Lisa B. Iturriaga	30.6	\$550.00	\$16,830.00
Mariam Nazaretyan	38.2	\$600.00	\$22,920.00
Harry Erganyan	40.3	\$600.00	\$24,180.00
John G. Yslas	55.1	\$1,500.00	\$82,650.00
Diego Aviles	58.8	\$800.00	\$47,040.00
TOTAL	226.8		\$196,095.00

21. This amount surpasses the requested fee award of \$183,333.33, resulting in a negative multiplier. This amount does not include the time Class Counsel will spend at the final approval hearing and assisting the Settlement Administrator following final approval. WLF dedicated significant resources to this case by dividing the tasks required according to skill level. The hours expended by each attorney were not duplicative and reflect the extensive investigation and analysis that was required to achieve this Settlement. This time could have been spent on other potentially lucrative cases. WLF's lodestar reflects the efficiencies achieved by attorneys experienced in this field.

22. In litigation costs, WLF has spent \$25,308.99 on items such as filing fees, service fees, mediation fees, and expert fees. Since Class Counsel's costs exceed the maximum of \$25,000.00, Class Counsel will only seek reimbursement of \$25,000.00 in litigation costs. As such, there will be no reversion to the Net Settlement Amount. The true and correct copies of WLF's cost reports in this matter are attached hereto as **Exhibit 2**. All of the costs incurred

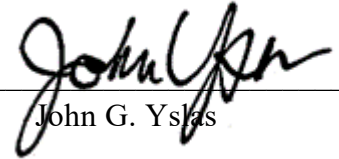
1 were reasonable and necessary for the prosecution of this case.

2 23. Class Counsel has negotiated a settlement here that they believe is fair,
3 reasonable, and adequate based on their prior experience litigating these type of cases.

4 24. To date, the LWDA has not responded to or objected to the Settlement in this
5 matter.

6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct. Executed on January 13, 2026 at Los Angeles, California.

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John G. Yslas

EXHIBIT 1

Date Completed	Task Completed	Attorney	Hours	Rate
04/08/2025	Email correspondence w/ SS re settlement agreement and class notice.	LI	0.1	\$550.00
04/09/2025	Email correspondence with accounting re current costs.	LI	0.2	\$550.00
04/09/2025	Email correspondences with several administrators re bid requests.	LI	0.7	\$550.00
04/10/2025	Further email correspondences with several administrators re bid requests.	LI	0.5	\$550.00
04/28/2025	FU correspondence w/ SS re settlement agreement, class notice, and MPA.	LI	0.1	\$550.00
04/29/2025	Review and revise settlement agreement and class notice; email correspondence w/ OPC re same; email correspondence w/ SS re same.	LI	1.6	\$550.00
05/02/2025	Draft motion for preliminary approval and supporting documents; email correspondence to OPC re preliminary approval documents.	LI	5.5	\$550.00
05/02/2025	FU email correspondence with OPC re settlement agreement and class notice.	LI	0.1	\$550.00
05/05/2025	Review revisions to motion for preliminary approval and revise same.	LI	0.5	\$550.00
05/30/2025	FU email correspondence with OPC re signatures on settlement agreement.	LI	0.1	\$550.00
06/04/2025	Review email correspondence from OPC.	LI	0.1	\$550.00
06/05/2025	Further revise motion for preliminary approval and supporting documents.	LI	3.0	\$550.00
06/05/2025	Email correspondence with OPC re motion for preliminary approval.	LI	0.2	\$550.00
06/06/2025	Further revise motion for preliminary approval and supporting documents.	LI	1.0	\$550.00
06/06/2025	Further email correspondence with OPC re motion for preliminary approval; correspondence w/ team re same.	LI	0.4	\$550.00
06/06/2025	Review minute order.	LI	0.1	\$550.00
06/30/2025	Review minute order.	LI	0.1	\$550.00
07/23/2025	Review minute order.	LI	0.1	\$550.00
07/23/2025	Email correspondence w/ OPC re prior ruling re motion for preliminary approval.	LI	0.2	\$550.00
08/01/2025	Review minute order.	LI	0.1	\$550.00

08/22/2025	Review correspondence w/ Team re amended motion for preliminary approval and supporting documents.	LI	0.1	\$550.00
09/05/2025	Draft/revise amended motion for preliminary approval and supporting documents.	LI	5.0	\$550.00
10/02/2025	Review minute order.	LI	0.1	\$550.00
10/07/2025	Review correspondence w/ settlement administrator, OPC and Team.	LI	0.1	\$550.00
10/14/2025	Review correspondence w/ settlement administrator, OPC and Team re class data.	LI	0.1	\$550.00
12/01/2025	Review preliminary calculations and proposed class notice; email correspondence w/ settlement administrator re same.	LI	0.3	\$550.00
12/08/2025	Review correspondence with settlement administrator and OPC re preliminary calculations and proposed class notice.	LI	0.1	\$550.00
12/18/2025	Email correspondence with settlement administrator re class notice.	LI	0.1	\$550.00
01/08/2026	Email correspondence with accounting re final costs; review costs; Email correspondence w/ DA re costs.	LI	0.5	\$550.00
01/08/2026	Email correspondence w/ Team re MFA, supporting documents/information.	LI	0.3	\$550.00
01/12/2026	FU email correspondence w/ Team re MFA, supporting documents/information.	LI	0.2	\$550.00
01/13/2026	Draft/revise motion for final approval and supporting documents; Email correspondence w/ Team re same; Email correspondence to OPC re same; Email correspondence w/ settlement administrator re declaration; finalize/file motion for final approval and supporting documents.	LI	9.0	\$550.00
TOTAL			30.6	\$16,830.00

Date Completed	Task Completed	Attorney	Hours	Rate
08/11/2023	Review PAGA / LWDA letter for approval; filing	AB	0.9	\$600.00
08/14/2023	Discuss LWDA / PAGA letter w team	AB	0.1	\$600.00
10/17/2023	Review notice of CMC; calendar	AB	0.1	\$600.00
11/28/2023	Review D notice of appearance re CMC	AB	0.1	\$600.00
11/28/2023	Notice of CMC continuance	AB	0.1	\$600.00
12/01/2023	Review D answer to complaint	AB	0.1	\$600.00
12/14/2023	Discuss CMC statement w team	AB	0.1	\$600.00
12/22/2023	Review OC email re mediation; mediators	AB	0.1	\$600.00
12/26/2023	Review OC email re mediation	AB	0.1	\$600.00
12/28/2023	Discuss CMC w team	AB	0.1	\$600.00
01/03/2024	Review court clerk email re continuance; CMC	AB	0.1	\$600.00
TOTAL			1.9	\$1,140.00

Date Completed	Task Completed	Attorney	Hours	Rate
11/21/2023	Unilateral CMC Statement	AS	0.8	\$500.00
TOTAL			0.8	\$400.00

Date Completed	Task Completed	Attorney	Hours	Rate
11/23/2023	Review of case file	DA	1.5	\$800.00
11/24/2023	Review of statutes of limitation	DA	0.8	\$800.00
11/30/2023	Review of pre-mediation document request	DA	0.5	\$800.00
11/30/2023	Meet and confer with OC regarding status of case and mediation	DA	0.5	\$800.00
11/30/2023	Review of Defendant's Answer to Complaint	DA	0.5	\$800.00
11/30/2023	Review of Joint Stipulation to file FAC + FAC	DA	0.8	\$800.00
12/08/2023	Review of personnel file	DA	1.2	\$800.00
12/08/2023	Review of Law and Motion Minute Order + calendaring	DA	0.4	\$800.00
12/14/2023	Review and strategy regarding upcoming CMS	DA	0.3	\$800.00
12/18/2023	Search for pending PAGA notice letters against Defendant	DA	0.4	\$800.00
12/21/2023	Research regarding prior class action against parent company Cogir Management	DA	2.5	\$800.00
12/21/2023	Research of Defendant corporate heirarchy + purchase by Cogir and effects on pending action	DA	1.4	\$800.00
12/22/2023	Email correspondence with OC re CMS	DA	0.2	\$800.00
12/22/2023	Review of proposed mediators for Mediation	DA	0.3	\$800.00
12/26/2023	Email correspondence with OC re Steve Rottman as mediator and proposed sampling of time and pay records	DA	0.3	\$800.00
12/28/2023	Draft and review of proposed joint report for 1/3/24 Status Conference	DA	0.3	\$800.00
12/29/2023	Review and calendaring of mediation for August 16, 2024	DA	0.2	\$800.00
01/02/2024	Calendaring of deadline to submit mediation briefs	DA	0.2	\$800.00
01/03/2024	Review of Law and Motion Minute Order + calendaring	DA	0.2	\$800.00
01/15/2024	Teleconference with Lawyers for Justice re: potential overlapping case	DA	0.5	\$800.00
02/08/2024	Revision of pre-mediation document request to send to OC	DA	0.5	\$800.00
04/01/2024	Teleconference with OC re: mediation	DA	0.4	\$800.00
04/26/2024	Review and filing of joint stipulation to file amended complaint	DA	0.3	\$800.00
04/29/2024	Email correspondence with OC amended complaint	DA	0.3	\$800.00

07/11/2024	Review of document production re: missing items for mediation	DA	0.5	\$800.00
07/18/2024	Review of mediation production of documents to send to expert for analysis	DA	0.7	\$800.00
08/04/2024	Analysis of arbitration agreement and research of case law	DA	2.5	\$800.00
08/05/2024	Review of amended complaint for filing	DA	0.5	\$800.00
08/05/2024	Conference with client regarding claims for mediation and discussion of mediation	DA	1.5	\$800.00
08/06/2024	Review of expert analysis and corresponding time and pay records for exhibits in mediation brief	DA	2.9	\$800.00
08/06/2024	Analysis of document production and claims regarding reimbursement with correspondence to expert	DA	0.8	\$800.00
08/07/2024	Review of Employee Handbooks and policies for class period	DA	2.5	\$800.00
08/07/2024	Review and drafting of mediation brief	DA	3.5	\$800.00
08/08/2024	Further review and analysis of arbitration agreement + confidentiality agreement	DA	3.5	\$800.00
08/08/2024	Review notes of client re: arbitration agreement and contract formation	DA	0.4	\$800.00
08/08/2024	Review of Settlement Proposal re mediation	DA	0.6	\$800.00
08/09/2024	Final review and submission of mediation brief	DA	1.0	\$800.00
08/12/2024	Teleconference with OC re: class period for mediation	DA	0.5	\$800.00
08/15/2024	Mediation with Rottman	DA	8.0	\$800.00
08/15/2024	Review of California Handbook Supplement provided by OC	DA	0.8	\$800.00
08/22/2024	Draft and review of MOU	DA	0.5	\$800.00
08/26/2024	Review of expert invoice for data analysis	DA	0.2	\$800.00
09/09/2024	Review and revision of MOU with Samantha Smith	DA	1.0	\$800.00
09/10/2024	Discussion with OC re: revision of workweeks from settlement	DA	1.0	\$800.00
09/12/2024	Review of edits to MOU	DA	1.0	\$800.00
09/23/2024	Teleconference with client regarding MOU	DA	0.7	\$800.00
09/26/2024	Email correspondence with OC re MOU	DA	0.2	\$800.00
09/27/2024	Email correspondence with OC re: edits to MOU	DA	0.3	\$800.00
09/30/2024	Teleconference with client regarding MOU	DA	0.3	\$800.00
10/04/2024	Calendaring of CMC and CMS deadline	DA	0.2	\$800.00

10/14/2024	Review of litigation expenses to date	DA	0.5	\$800.00
10/30/2024	Review of Law and Motion Minute Order + calendaring	DA	0.3	\$800.00
11/05/2024	Follow up with client re: signature on MOU	DA	0.2	\$800.00
01/09/2025	Review of joint report for CMC	DA	0.3	\$800.00
01/17/2025	Request for zoom link appearance information for CMC	DA	0.2	\$800.00
01/22/2025	Teleconference with client	DA	0.3	\$800.00
01/23/2025	Review and calendaring of deadline to file MPA	DA	0.2	\$800.00
01/23/2025	Return call to client	DA	0.2	\$800.00
01/30/2025	Review of Minute Order re CMC and CMS	DA	0.2	\$800.00
03/17/2025	Draft of long-form settlement agreement	DA	1.5	\$800.00
05/02/2025	Review of new MPA filing deadline + calendaring	DA	0.3	\$800.00
05/08/2025	Review of joint report for CMC	DA	0.2	\$800.00
05/08/2025	Email correspondence with OC re: edits to long-form	DA	0.2	\$800.00
05/19/2025	Review of hearing memo and minute order	DA	0.2	\$800.00
05/19/2025	Teleconference with client	DA	0.3	\$800.00
06/04/2025	Review and compilation of signatures on long-form settlement agreement	DA	0.2	\$800.00
06/05/2025	Review of MPA	DA	1.5	\$800.00
06/06/2025	Draft + review of client declaration for MPA	DA	1.0	\$800.00
06/30/2025	Review of Tentative Ruling re MPA	DA	0.3	\$800.00
07/29/2025	Review of calendaring	DA	0.2	\$800.00
09/24/2025	Review and approval of invoice re expert declaration	DA	0.2	\$800.00
09/29/2025	Review of tentative ruling re MPA	DA	0.2	\$800.00
TOTAL			58.8	\$47,040.00

Date Completed	Task Completed	Attorney	Hours	Rate
07/28/2023	Finalized drafting and approving Complaint with team.	HE	1.5	\$600.00
11/30/2023	FAC adding PAGA	HE	1	\$600.00
11/30/2023	Reviewing Defendant's Answer	HE	1	\$600.00
11/30/2023	Stip and PO	HE	1.5	\$600.00
12/21/2023	Searching/reviewing potentially related matters and reviewing procedural history and possible impact on our case.	HE	2.5	\$600.00
12/22/2023	Internal discussions re strategy moving forward.	HE	2	\$600.00
12/26/2023	Joint statement draft and correspondence with defense counsel.	HE	1	\$600.00
12/28/2023	Reviewing case file in advance of CMC and sending/discussing the hearing date to our calendar clerk to obtain remote appearance information.	HE	1.5	\$600.00
12/29/2023	Sending for filing joint statement upon approval from defense counsel	HE	0.5	\$600.00
01/03/2024	Forwarding and reviewing email from court re continued CMC for calendaring	HE	0.5	\$600.00
02/22/2024	Drafting initial sets of class discovery	HE	2.0	\$600.00
07/15/2024	Auditing and reviewing Defendant's mediation production	HE	2.5	\$600.00
08/06/2024	Reviewing Defendant's production, discussing with team, and emailing expert Defendants production	HE	3.0	\$600.00
08/06/2024	Reviewing personnel file and correspondence with defense counsel regarding missing information and documents.	HE	2.0	\$600.00
08/09/2024	Analysis re mediation brief and edits.	HE	4.6	\$600.00
08/13/2024	Reviewing additional documents from defendant received today specific to Plaintiff.	HE	2.3	\$600.00
08/15/2024	Mediation	HE	7	\$600.00
11/16/2024	Internal analysis and meeting regarding calendaring settlement status.	HE	1.4	\$600.00
05/20/2025	CMC appearance, prep, waiting time, appearance, and memo.	HE	2.5	\$600.00
TOTAL			40.3	\$24,180.00

Date Completed	Task Completed	Attorney	Hours	Rate
07/28/2023	Review LWDA notice letter	JB	0.2	\$850.00
08/11/2023	Review draft LWDA notice letter	JB	0.3	\$850.00
10/23/2023	Correspondence with attorney service re service of complaint	JB	0.2	\$850.00
11/19/2023	Review case management statement	JB	0.2	\$850.00
12/29/2023	Correspondence from mediator re mediation fee	JB	0.2	\$850.00
TOTAL			1.1	\$935.00

Date Completed	Task Completed	Attorney	Hours	Rate
07/08/2023	Factual Investigation, review case, evaluate issues and research law and theories	JY	6.5	1,500.00
07/10/2023	Analysis re facts, questions, and strategize re discovery and approach to case	JY	3.8	1,500.00
07/17/2023	Analysis and finalization of complaint, investigate and evaluate discovery to propound and research and analysis re various causes of action	JY	6.8	1,500.00
08/02/2024	Analysis and work related to preparation for mediation and related details and law	JY	6.9	1,500.00
08/12/2024	Analysis and research and prepare for mediation including review facts, law and outline key issues and work through expert data issues	JY	6.1	1,500.00
08/14/2024	Continued preparation mediation including analysis of data, outlining arguments and coordinating	JY	2.7	1,500.00
08/15/2024	Prepare for, attend mediation and aftermath related to the same	JY	8.8	1,500.00
08/16/2024	Analysis and evaluation of next steps to finalize case	JY	0.2	1,500.00
08/27/2024	Attention to and analysis and work re settlement agreement and other issues	JY	5.4	1,500.00
09/10/2024	Analysis and attention to calculations re settlement, research re settlement factors and work related to motion for approval	JY	6.8	\$1,500.00
TOTAL			55.1	\$82,650.00

Date Completed	Task Completed	Attorney	Hours	Rate
04/26/2024	Email correspondence with opposing counsel regarding the joint stipulation granting Plaintiff leave to file an amended complaint.	MN	0.1	\$600.00
04/29/2024	Email correspondences with staff regarding the joint stipulation.	MN	0.2	\$600.00
07/11/2024	Review of produced documents to date in the matter.	MN	0.5	\$600.00
07/11/2024	Email correspondence with opposing counsel regarding the informal production for mediation.	MN	0.1	\$600.00
07/16/2024	Email correspondence with expert regarding production for mediation.	MN	0.1	\$600.00
07/17/2024	Email correspondence with expert regarding production for mediation.	MN	0.1	\$600.00
07/17/2024	Email correspondence with opposing counsel regarding production for mediation.	MN	0.1	\$600.00
07/18/2024	Email correspondence with expert regarding production for mediation.	MN	0.1	\$600.00
07/19/2024	Email correspondence with expert regarding production for mediation.	MN	0.1	\$600.00
07/19/2024	Email correspondence with opposing counsel regarding production for mediation.	MN	0.1	\$600.00
07/22/2024	Email correspondence with expert regarding production for mediation.	MN	0.1	\$600.00
07/23/2024	Email correspondence with expert regarding production for mediation.	MN	0.1	\$600.00
07/23/2024	Email correspondence with opposing counsel regarding production for mediation.	MN	0.1	\$600.00
07/29/2024	Email correspondence with opposing counsel regarding production for mediation.	MN	0.1	\$600.00
08/05/2024	Review of signed order granting Plaintiff permission to file amended complaint and communication with staff to file the amended complaint.	MN	0.2	\$600.00
08/05/2024	Mediation intake.	MN	1.0	\$600.00
08/06/2024	Review of documents produced for mediation.	MN	2.5	\$600.00
08/06/2024	Draft mediation brief.	MN	4.4	\$600.00
08/06/2024	Email correspondence with expert regarding production for mediation.	MN	0.1	\$600.00

08/06/2024	Review of expert's analysis of the produce documents for mediation.	MN	1.0	\$600.00
08/07/2024	Email correspondence with opposing counsel regarding production for mediation.	MN	0.1	\$600.00
08/07/2024	Continued draft mediation brief.	MN	2.6	\$600.00
08/08/2024	Correspondence with team regarding edits to the mediation brief.	MN	0.5	\$600.00
08/08/2024	Final edits to draft mediation brief and finalization of brief to submit to mediator.	MN	2.5	\$600.00
08/09/2024	Email correspondence with the mediator regarding the mediation brief.	MN	0.1	\$600.00
08/09/2024	Email correspondence with opposing counsel regarding the mediation brief.	MN	0.1	\$600.00
08/12/2024	Review of additional documents produced for mediation.	MN	0.9	\$600.00
08/15/2024	Attendance at mediation.	MN	7.0	\$600.00
08/15/2024	Call with client.	MN	0.4	\$600.00
09/30/2024	Call with client.	MN	0.3	\$600.00
10/9/2024	Draft joint statement.	MN	0.5	\$600.00
10/9/2024	Email correspondence with opposing counsel regarding the joint statmenet.	MN	0.1	\$600.00
10/10/2024	Email correspondence with opposing counsel regarding the joint statmenet.	MN	0.1	\$600.00
10/10/2024	Communication with staff to file the joint report.	MN	0.1	\$600.00
10/17/2024	Call with client.	MN	0.2	\$600.00
11/4/2024	Call with client.	MN	0.3	\$600.00
01/09/2025	Draft joint statement.	MN	0.5	\$600.00
01/09/2025	Email correspondence with opposing counsel regarding the joint statmenet.	MN	0.1	\$600.00
01/10/2025	Email correspondence with opposing counsel regarding the joint statmenet.	MN	0.1	\$600.00
01/10/2025	Communication with staff to file the joint report.	MN	0.1	\$600.00
01/21/2025	Court appearance at CMC.	MN	0.8	\$600.00
01/21/2025	Draft appearance memo and email correspondence the staff to calendar continued CMC hearing date.	MN	0.3	\$600.00
01/22/2025	Communication with staff to reserve a hearing date for the MPA and to provide client with an update.	MN	0.2	\$600.00
03/20/2025	Draft long-form settlement agreement and class notice.	MN	6.4	\$600.00

05/08/2025	Draft joint statement.	MN	0.5	\$600.00
05/08/2025	Email correspondences with opposing counsel regarding the joint statement.	MN	0.3	\$600.00
05/09/2025	Communication with staff to file the joint report.	MN	0.1	\$600.00
05/28/2025	Email correspondence with staff regarding the long-form settlement agreement.	MN	0.1	\$600.00
05/28/2025	Email correspondence with opposing counsel regarding the long-form settlement agreement.	MN	0.1	\$600.00
06/06/2025	Email correspondence with staff regarding Plaintiff's declaration in support of the MPA.	MN	0.1	\$600.00
06/30/2025	Email to staff to calendar continued CMC and MPA hearing date.	MN	0.1	\$600.00
07/28/2025	Communication with staff to speak with client and provide an update.	MN	0.2	\$600.00
07/31/2025	Court appearance at CMC.	MN	0.7	\$600.00
07/31/2025	Draft appearance memo and email correspondence the staff to calendar continued CMC hearing date.	MN	0.3	\$600.0
09/26/2025	Review of the court's docket regarding the tentative, and email correspondence with staff to calendar the MFA hearing date.	MN	0.3	\$600.0
TOTAL			38.2	\$22,920.00

EXHIBIT 2

01/08/26
Accrual Basis

Wilshire Law Firm, PLC
Client Costs Detailed Report
All Transactions

Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 - COS							
501500 - Court Filing Fees							
Bill	10/25/2023	66765	CadenceSLWFresno(Chaparro).W&H	Valpro Attorney Services, LLC	66765 CadenceSLWFresno(Chaparro).W&H File POS	45.00	45.00
Credit ...	08/03/2023	20898845	CadenceSLWFresno(Chaparro).W&H	One Legal LLC	20898845-S&C-Atty Svc for Court Filing-242017 CadenceSLWFr...	1,494.53	1,539.53
Credit ...	11/22/2023	21684564	CadenceSLWFresno(Chaparro).W&H	One Legal LLC	21684564-Notice-Atty Svc for Court Filing-242017 Dominique Ch...	24.24	1,563.77
Credit ...	11/22/2023	21687915	CadenceSLWFresno(Chaparro).W&H	One Legal LLC	21687915-CMS-Atty Svc for Court Filing-242017 Dominique Cha...	24.24	1,588.01
Credit ...	11/28/2023	21687916	CadenceSLWFresno(Chaparro).W&H	One Legal LLC	21687916-CMS-Atty Svc for Court Filing-242017 Dominique Cha...	51.48	1,639.49
Credit ...	01/02/2024	21920076	CadenceSLWFresno(Chaparro).W&H	One Legal LLC	21920076-Statement-Atty Svc for Court Filing-242017 Dominique...	27.33	1,666.82
Credit ...	01/02/2024	21920931	CadenceSLWFresno(Chaparro).W&H	One Legal LLC	21920931-Ntc, Proposed Order-Atty Svc for Court Filing-242017 ...	20.13	1,686.95
Credit ...	05/08/2024	22786279	CadenceSLWFresno(Chaparro).W&H	One Legal LLC	22786279-Stip&Ord-Atty Svc for Court Filing-242017 Dominique ...	47.46	1,734.41
Credit ...	08/15/2024	23465372	CadenceSLWFresno(Chaparro).W&H	One Legal LLC	23465372-242017-Atty Svc for Court Filing-Amendment to Compl...	27.33	1,761.74
Credit ...	10/10/2024	23906647	CadenceSLWFresno(Chaparro).W&H	One Legal LLC	23906647-242017-Atty Svc for Court Filing-CMS-CadenceSLWFr...	22.41	1,784.15
Credit ...	01/13/2025	24484154	CadenceSLWFresno(Chaparro).W&H	One Legal LLC	24484154-242017-Atty Svc for Court Filing-CMS-CadenceSLWFr...	24.93	1,809.08
Credit ...	05/12/2025	25351481	CadenceSLWFresno(Chaparro).W&H	One Legal LLC	25351481-242017-Atty Svc for Court Filing-CMS-CadenceSLWFr...	26.73	1,835.81
Credit ...	06/30/2025	25558174	CadenceSLWFresno(Chaparro).W&H	One Legal LLC	25558174-242017-Atty Svc for Court Filing-Declar,Prop Ord,POS...	86.62	1,922.43
Total 501500 - Court Filing Fees						1,922.43	1,922.43
502500 - Legal Expenses							
Credit ...	08/16/2023		CadenceSLWFresno(Chaparro).W&H	Department of Industrial Relati...	ORD 000247436 (242017) Cadence	75.00	75.00
Total 502500 - Legal Expenses							
502700 - Mediation Fees							
Bill	01/02/2024	5035	CadenceSLWFresno(Chaparro).W&H	Steven J Rottman LLC	5035-CadenceSLWFresno(Chaparro).W&H-Mediation Fees	14,000.00	14,000.00
Total 502700 - Mediation Fees						14,000.00	14,000.00
503200 - Process Service Fees							
Bill	10/24/2023	66750	CadenceSLWFresno(Chaparro).W&H	Valpro Attorney Services, LLC	66750 CadenceSLWFresno(Chaparro).W&H Servee Cadence S...	141.00	141.00
Bill	07/31/2024	79593	CadenceSLWFresno(Chaparro).W&H	Valpro Attorney Services, LLC	79593-CadenceSLWFresno(Chaparro).W&H-Servee Dominique ...	135.00	276.00
Bill	08/19/2024	80382	CadenceSLWFresno(Chaparro).W&H	Valpro Attorney Services, LLC	80382-CadenceSLWFresno(Chaparro).W&H-Servee Dominique ...	135.00	411.00
Total 503200 - Process Service Fees						411.00	411.00
503300 - Professional Fees							
Bill	08/22/2024	10697	CadenceSLWFresno(Chaparro).W&H	Berger Consulting Group, LLC	10697-CadenceSLWFresno(Chaparro).W&H-15.30 hours of work	6,885.00	6,885.00
Total 503300 - Professional Fees						6,885.00	6,885.00
Total 500000 - COS							



Client Cost Report

Account	Type	Date	Num	Name	Matter Display Name	Line Memo	Amount
501500 Cost of Sale : Court Filing Fees	Credit Card	7/11/2025	CC073125TA-1258	One Legal LLC	Cadence SL Windham Fresno LLC (Chaparro) - Wage & Hour (Class Action)	25753518-242017-Atty Svc for Court Filing-Change of Address-Cadence SL Windham Fresno LLC (Chaparro) - Wage & Hour (Class Action)	\$26.73
501500 Cost of Sale : Court Filing Fees	Credit Card	9/12/2025	CC093025TA-1500	One Legal LLC	Cadence SL Windham Fresno LLC (Chaparro) - Wage & Hour (Class Action)	26243013-242017-Atty Svc for Court Filing-Declar,Prop Ord,POS-Dominique Chaparro-5/5/2023	\$96.94
503300 Cost of Sale : Professional Fees	Bill	9/18/2025	16295	Berger Consulting Group LLC	Cadence SL Windham Fresno LLC (Chaparro) - Wage & Hour (Class Action)	16295-Cadence SL Windham Fresno LLC (Chaparro)-2.80 hrs of work	\$1,890.00
Total							\$2,013.67

As of 2026-01-08 16:45:26 Pacific Standard Time/PST • Generated by Louis Montgomery

Show: All matters

Matter: ID equals a0L5G00000X1GJJ

Expense Type equals E127 — DTF,DTF,E108 — Postage,E102 — Printing

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