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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SISKIYOU**

JEREMY D. FRALEY and JERRY D.
HAGERTY, individuals on behalf of
themselves and others similarly situated,

Plaintiffs,

vs.

ROSEBURG FOREST PRODUCTS CO.,
an Oregon corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No. 23CV05757

CLASS ACTION

Assigned for All Purposes To:
Hon. JoAnn Bicego
Dept.: 2

**DECLARATION OF ENOCH J. KIM IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND PAGA
SETTLEMENT AGREEMENT**

Date: October 23, 2025
Time: 09:30 a.m.
Dept.: 2

Hagerty v. Roseburg Forest Products Co.:

Case No: 23CV07660
Original Complaint filed: August 3, 2023
First Amended Complaint filed: October 9, 2023

Fraley v. Roseburg Forest Products Co.:

Case No: 23CV05757
Original Complaint filed: June 20, 2023
First Amended Complaint filed: October 6,
2023
Second Amended Complaint filed: February 25,
2025

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1. I am an attorney licensed and admitted to practice before all courts of the State of California, the United States District Court for the Central, Southern, Eastern, and Northern Districts of California. I am Senior Counsel at D.LAW, INC. and counsel for plaintiff Jerry D. Hagerty (“Plaintiff”), on behalf of himself and all other similarly situated employees of defendant Roseburg Forest Products Co. (“Defendant”).

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1 against Defendant entitled *Fraley v. Roseburg Forest Products Co.* (herein referred to as the
2 “Fraley Action”). After conversations amongst Plaintiffs’ counsel (“Class Counsel”), Plaintiffs
3 and their counsel agreed to jointly litigate and consolidate the Fraley and Hagerty Actions. The
4 Parties thereafter filed a stipulation and proposed order to consolidate the two actions. After the
5 Court issued an order consolidating the Fraley and Hagerty Actions, the Parties filed a second
6 amended complaint on February 25, 2025, entitled *Jeremy D. Fraley, et. al. v. Roseburg Forest*
7 *Products Co.* (“Operative Complaint”), Case No. 23CV05757 (“the Action”).

8 6. The Parties agreed to explore early resolution via mediation and engage in informal
9 discovery prior to mediation. After exchanging and reviewing informal discovery and participating
10 in mediation, the Parties reached a settlement. On April 24, 2025, this Court entered an Order
11 Granting Plaintiffs’ Motion for Preliminary Approval of Class Action and PAGA Settlement
12 (“Preliminary Approval Order”).

13 7. The Settlement is the product of extensive arm’s-length negotiations between the
14 Parties. The Parties are represented by experienced class action attorneys. In order to reach the
15 Settlement, the Parties debated and discussed many difficult legal and factual issues. Moreover,
16 during the process, the Parties were required to make reasonable compromises in light of the facts,
17 issues, and risks presented in this Action. Class Counsel considered the uncertainty and risks of
18 further litigation, and the difficulties inherent in such litigation. Class Counsel also considered the
19 burdens of proof necessary to establish liability against Defendant and Defendant’s defenses, the
20 length and complexity of the trial itself, and the risks of further delays and expenses arising from
21 possible appeals. Defendant contends that the Class would not be able to establish its entitlement
22 to the full extent of the relief it is seeking, and promised to mount a vigorous defense. On the other
23 hand, Plaintiffs believe that there is ample evidence to support the class allegations. Assessment of
24 all of these factors indicated that the best interests of Class Members would be served by a
25 settlement of this Action in the manner and upon the terms set forth in the Parties’ Class Action
26 and PAGA Settlement Agreement (“Settlement Agreement” or “Settlement”).

27 8. To reiterate, under the terms of the proposed Settlement, the amount available for
28 distribution to Class Members who do not opt-out of the Settlement is \$2,500,000.00 less the

1 following deductions: (1) up to \$833,333.33 to Class Counsel for attorneys' fees ("Class Counsel
2 Fees Payment"); (2) \$32,314.90 to Class Counsel for reimbursement of actual costs incurred in
3 prosecuting the Action ("Class Counsel Litigation Expenses Payment"); (3) up to \$10,000.00 each
4 (for a total of \$20,000.00) to Plaintiffs Jeremy D. Fraley and Jerry D. Hagerty for the Class
5 Representative Service Payments; (4) up to \$7,950.00 for the Administration Expenses Payment to
6 ILYM Group, Inc. ("ILYM Group"); and (5) the PAGA Penalties of \$100,000.00 for claims
7 asserted under California's Private Attorneys General Act ("PAGA"), of which 75% will be
8 payable to the California Labor and Workforce Development Agency ("LWDA") ("LWDA
9 PAGA Payment") and 25% will be payable to the Aggrieved Employees on a *pro rata* basis
10 ("Individual PAGA Payment").

11 9. From my experience in wage and hour litigation, the present Settlement has
12 resulted in a substantial benefit to Class Members. In fact, the highest Individual Class Payment to
13 a Participating Class Member is currently estimated to be approximately \$11,340.90, the average
14 Individual Class Payment is currently estimated to be approximately \$3,289.09, and the lowest
15 Individual Class Payment is currently estimated to be approximately \$35.89. (Declaration of
16 Nathalie Hernandez, filed concurrently herewith ("Hernandez Decl."), ¶ 16.)

17 SETTLEMENT ADMINISTRATION

18 10. The settlement administration was fairly settled and administered. After the Court
19 entered the Preliminary Approval Order, on June 9, 2025, ILYM Group sent the Class Notice to
20 all 459 Class Members' last-known mailing addresses using U.S. First Class Mail, and made
21 significant efforts to locate Class Members, including performing skip traces on those employees
22 who could not be located. (Hernandez Decl., ¶¶ 7 – 8).

23 11. Of the 459 Class Members who were sent the Class Notice, ILYM Group
24 received 74 returned Class Notices as undeliverable. (*Id.* at ¶ 8.) ILYM Group performed a
25 computerized skip trace on the 74 returned Class Notices in an effort to obtain an updated
26 addresses for the purpose of re-mailing the Class Notice. (*Id.*) The skip trace effort resulted in
27 obtaining 47 updated addresses, to which ILYM Group promptly re-mailed the Class Notices
28 to those Class Members via U.S. First Class Mail. (*Id.*) As of the date of the Administrator's

1 declaration, there have been 47 Class Notices re-mailed as a result of ILYM Group's skip
2 tracing efforts, and 27 Class Notices have been deemed undeliverable as no updated address
3 was found, notwithstanding the skip tracing. (*Id.* at ¶¶ 9 – 10.)

4 12. Class Notices were distributed in accordance with the Court's Preliminary
5 Approval Order, and the response was excellent. Here, the deadline for submitting a Request
6 for Exclusion from the Settlement, challenging the number of Workweeks and/or PAGA Pay
7 Periods, and objecting to the Settlement was August 8, 2025. (Hernandez Decl., ¶¶ 11 – 13).
8 As of the deadline, **zero Class Members objected** to the Settlement, **only three challenged**
9 the number of Workweeks and/or PAGA Pay Periods, which have been resolved, and **only one**
10 **opted out** of the Settlement. (*Id.*) Therefore, there is a total of 458 Participating Class
11 Members, representing 99.78% of the 459 Class Members. (*Id.* at ¶ 14.)

12 13. The fact that there was a 99.78% participation rate indicates that the persons
13 most affected by Defendant's alleged practices and who stand to benefit most from the
14 Settlement agree that this is an outstanding result and a strong indication that the Settlement is
15 fair and adequate, and that Class Members found it to be so.

16 14. ILYM Group requests an Administration Expenses Payment of \$7,950.00. (*Id.*
17 at ¶ 19.)

18 **REQUEST FOR ATTORNEYS' FEES AND COSTS**

19 15. The preliminarily approved Settlement calls for the payment of up to \$875,000.00
20 in attorneys' fees. Class Counsel has voluntarily reduced its request for attorneys' fees in the
21 amount of one-third of the Gross Settlement Amount (or \$833,333.33). Class Counsel also
22 requests \$32,314.90 in attorneys' costs. This request is fair, reasonable, and adequate to
23 compensate Class Counsel for the substantial work they have put into this case and the risk they
24 assumed by taking it in the first place. The attorneys' fees award is intended to reimburse Class
25 Counsel for all uncompensated work that they have already done and for all the work they will
26 continue to do in carrying out and overseeing the administration of the Settlement. To provide the
27 Court with an overview of the work done by D.Law, Inc. and David Yeremian & Associates, Inc.
28 in this case, D.Law, Inc. and David Yeremian & Associates, Inc.'s contemporaneous time records

1 substantiating the 153.0 hours worked is attached hereto as **Exhibit 1**. Aegis Law Firm, PC's
2 269.2 hours of work is discussed in the Declaration of Jessica L. Campbell in Support of
3 Plaintiffs' Motion for Final Approval of Class Action Settlement ("Campbell Decl."), filed
4 concurrently herewith. This detailed summary is intended to provide the Court with sufficient
5 detail to of the tasks performed in connection with specific motions, events, or phases that track
6 the progress of the litigation from our initial investigation through settlement.

7 **The Lodestar Method**

8 16. Class Counsel's lodestar calculation supports the requested attorneys' fees. The
9 lodestar calculation typically proceeds in three steps. First, a trial court must determine a baseline
10 guide or "lodestar" figure based on the time spent and reasonable hourly compensation for each
11 attorney involved in the case. *Serrano v. Priest* (1975) 20 Cal.3d 25, 48. The court then sets a
12 reasonable hourly fee to apply to the time expended, with reference to the prevailing rates in the
13 geographical area in which the action is pending. *Bihun v. AT&T Information System* (1993) 13
14 Cal.App.4th 976, 997. Finally, a "multiplier" is selected with reference to the following factors:
15 (1) the novelty and difficulty of issues involved, (2) the skill displayed in presenting them, (3) the
16 extent to which the nature of the litigation precluded other employment by the attorneys, and (4)
17 the contingent nature of the fee award, based on the uncertainty of prevailing on the merits and of
18 establishing eligibility for the award. *Serrano, supra*, 20 Cal.App.3d at 49.

19 17. Class Counsel charges rates commensurate with the prevailing market rates in the
20 Los Angeles area for attorneys of comparable experience and skill handling complex litigation.

21 18. Working closely with the other attorneys in my firm, including on motions for
22 attorneys' fees, I am aware of the experience and achievements of the counsel involved in this
23 matter as well as the rates which would be charged if our work was on an hourly basis. Based on
24 this information, I believe that my rate and the rates of the attorneys in my firm are reasonable,
25 appropriate, and fully consistent with the market rate for attorneys with comparable expertise,
26 experience, and qualifications in Los Angeles.

27 19. I am Senior Counsel at D.Law where I manage the class action and PAGA
28 settlement department. I was admitted to the California Bar in December 2008. I received my J.D.

1 from Pepperdine University School of Law and B.S. from University of Southern California.
2 Since graduating from law school, I have dedicated virtually my entire career on the practice of
3 employment law. I have practiced employment law from the plaintiff's side, defense side, and
4 from an in-house position. I have significant experience specifically working on wage and hour
5 class and PAGA actions from the plaintiff's side as well as the defense side, with the majority of
6 my experience coming from the plaintiff's side. Throughout the course of this litigation, I have
7 spent approximately 10.3 hours on this matter. My lodestar for my hours spent on this case
8 amounts to approximately \$10,763.50 ($10.3 \times \$1,045.00 = \$10,763.50$). Given my experience and
9 the focus of my practice, if I were to charge for my type of work by the hour, my rate would be
10 \$1,045.00 per hour. A \$1,045.00 rate is warranted based on my years of experience in a highly
11 specialized area of law (17 years out of law school).

12 20. Attorney Alvin B. Lindsay graduated from the United States Military Academy at
13 West Point and then served as an Army Officer for 10 years in the Corps of Engineers. He then
14 earned his Juris Doctorate from Whittier Law School and has been practicing in California for
15 over twenty years. Since 2010, he has exclusively focused his practice on representing employees
16 including in wage-and-hour class and PAGA actions. During his career, he has represented
17 employees in many wage-and-hour class and PAGA action lawsuits as lead or co-lead counsel
18 (including in the Central, Southern, Eastern, and Northern Districts of California), and has been
19 successful in getting many contested class action cases certified and has secured class and PAGA
20 settlements for many millions of dollars against a range of defendants, including Fortune 500
21 companies. He is experienced and qualified to evaluate the representative claims, to evaluate
22 settlement versus trial on a fully informed basis, and to evaluate the viability of the defenses.
23 Throughout the course of this litigation, attorney Alvin B. Lindsay estimates he has spent at least
24 64.0 hours litigating this matter. Accordingly, Mr. Lindsay's lodestar in this matter is \$80,640.00
25 ($64.0 \times \$1,260.00 = \$80,640.00$). If Mr. Lindsay were to charge a rate for this type of work by the
26 hour, given his experience and the focus of his practice, his current hourly rate would be \$1,260.00
27 per hour. A \$1,260.00 rate is warranted based on Mr. Lindsay's years of experience in a highly
28 specialized area of law (24 years out of law school).

21. Attorney Arianna Razi received her bachelor's degree from the University of California, Davis in 2020, and her Juris Doctorate degree from Loyola Law School, Los Angeles in 2024. Since starting her professional career, she has focused on plaintiff's side employment law and has been appointed as class and PAGA counsel in other wage and hour settlements in California state court. Throughout the course of this litigation, Arianna Razi estimates she has spent at least 14.0 hours litigating this matter. Accordingly, Ms. Razi's lodestar in this matter is \$6,650.00 (14.0 x \$475.00 = \$6,650.00). If Ms. Razi were to charge a rate for this type of work by the hour, given her experience and the focus of her practice, her current hourly rate would be \$475.00. A \$475.00 rate is warranted based on Ms. Razi's experience in a highly specialized area of law (1 year out of law school).

22. I have also reviewed the files and billable records for Melissa Rodriguez, a former attorney of D.Law, Inc. in this matter and Ms. Rodriguez spent approximately 57.9 hours litigating this matter. Ms. Rodriguez is no longer an associate with our firm. I am aware she graduated from UC College of the Law, San Francisco (formerly UC Hastings) in 2023 and has been licensed to practice law since 2023. If Ms. Rodriguez were to charge a rate for this type of work by the hour, given her experience, her current hourly rate would be \$475.00 per hour. A \$475.00 rate is warranted based on Ms. Rodriguez's experience in a highly specialized area of law (2 years out of law school). Accordingly, Ms. Rodriguez's lodestar in this matter is \$27,502.50 (57.9 x \$475.00 = \$27,502.50).

23. The below table summarizes Class Counsel's total hours, billables, and costs:

<u>Attorney/Firm</u>	<u>Total Hours</u>	<u>Total Billables</u>	<u>Costs</u>
Enoch Kim (D.LAW)	10.3	\$10,763.50	\$7,915.00
David Yeremian (DYA)	6.8	\$9,350.00	
Alvin B. Lindsay (D.LAW)	64.0	\$80,640.00	
Melissa Rodriguez (D.LAW)	57.9	\$27,502.50	
Arianna Razi (D.LAW)	14.0	\$6,650.00	
Aegis Law Firm, PC	269.2	\$223,962.50	\$24,399.90

Totals:	422.2	\$358,868.50	\$32,314.90
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24. Multiplying the total hours billed by Class Counsel to the litigation by their reasonable hourly rates yields a lodestar of \$358,868.50.

25. Class Multipliers routinely range from 3 to 5, and it is not uncommon that multipliers of between 5 and 10, or higher, are applied. *See, e.g., Wilson v. Bank of Am. Natl. Trust & Savs. Assn.*, No. 643872 (Cal. Sup. Ct., Aug. 16, 1982) (multiplier of 10); *Glendora Comm. Redev. Agency v. Demeter* (1984) 155 Cal.App.3d 456, 465 (affirming multiplier of 12 and expressly rejecting the argument that fee was either exorbitant or unconscionable). The multiplier in this case of 2.32 is clearly within the reasonable range approved in lodestar crosschecks.

26. As for the *Serrano* factors, all militate in favor of the requested fee award. This case raised a number of complex and contested issues, and Class Counsel exhibited skill and creativity in prosecuting and presenting them. Chief among these was the law relating to meal and rest periods, and failure to pay class members wages for off-the-clock work and final wages.

27. This case was not straightforward. Class Counsel had to spend time researching and analyzing each of these claims and issues in order to adequately assess the liability of Defendant. Class Counsel then had to develop the evidence necessary through informal discovery to establish Defendant's liability. This was done through carefully sifting through hundreds of pages of documents. Class Counsel have devoted a substantial amount of time on this case, including but not limited to researching various legal issues prior to and after filing this Action; drafting and reviewing pleadings; conducting informal discovery; meeting and conferring with defense counsel; preparing for class certification; reviewing and analyzing the documents produced by Defendant; regularly communicating with Plaintiffs; preparing for and attending mediation; negotiating and finalizing the Settlement Agreement, including several revisions thereof; drafting documents for preliminary and final approval, including documents for the administration of the Settlement; and coordinating and overseeing the administration of the Settlement.

28. In sum, Class Counsel had to come up with creative approaches to these issues in litigating the case and, ultimately, negotiating and crafting the Settlement. To this end, Class

1 Counsel has devoted a tremendous amount of time and energy. As shown in the table in Paragraph
2 22 above, Class Counsel have spent a substantial number of hours working on this case. This time
3 commitment was necessary in order to research, construct, and prosecute viable legal claims in the
4 face of stiff opposition, but it has come at a cost. In particular, the time Class Counsel have
5 devoted to this case has prevented them from investing that time in other cases that might have
6 settled during the pendency of this litigation and yielded significant attorneys' fees. Despite these
7 considerations, Class Counsel zealously represented Plaintiffs and the Class and have obtained a
8 favorable result.

9 29. Such is not always the case. Indeed, Class Counsel has invested time and money
10 into numerous other cases, including class actions, that have fizzled for one reason or another,
11 leaving Class Counsel completely without any compensation for their effort. Here, Class Counsel
12 has achieved a beneficial settlement for the Class, but this was by no means a foregone
13 conclusion; indeed, their efforts might well have been frustrated by any number of obstacles with
14 which they were presented along the way. Nor could class certification be guaranteed. In addition,
15 Defendant could have exerted pressure on Plaintiffs to dismiss their claims by offering them an
16 individual settlement, an experience with which Class Counsel are not unfamiliar. However, Class
17 Counsel was able to navigate the shoals of unpredictability to achieve a desirable result, and they
18 have done so without receiving any compensation to speak of thus far because they took this case
19 on a contingency-fee basis.

20 30. From the foregoing analysis, Class Counsel's requested attorneys' fees are fair and
21 reasonable. The rates of the attorneys at our firm are reasonable and appropriate fees for Los
22 Angeles County.

23 **The Percentage-of-the-Benefit Comparison**

24 31. In settlements where a definite monetized fund is created, it is appropriate for
25 courts to evaluate the lodestar amount as a percentage of the recovery and adjust it accordingly if
26 the lodestar differs from the range of percentage fees freely negotiated in comparable litigation.
27 *See Lealao v. Beneficial Calif., Inc.* (2000) 82 Cal.App.4th 19, 49-50.

28 32. Class Counsel took this case on a contingent-fee basis against a corporation

1 represented by a reputable defense firm. When we take contingent cases, we must pay careful
2 attention to the economics involved or one bad case can destroy years of work. Accordingly, in
3 such cases, we anticipate that we shall, if successful, receive a fee that exceeds our normal hourly
4 rate; otherwise the risk is often too great to bear. Even when we work long hours, the number of
5 hours in a day is limited.

6 33. Contingent-fee cases present the very real risk of working hundreds if not
7 thousands of hours that may never be entirely compensated. Moreover, while the case is being
8 litigated, counsel must pay overhead (salaries, rent, etc.), provide for their own expenses, and in
9 most cases pay the out-of-pocket expenses incurred on the plaintiff's behalf, and the prospect of a
10 court-awarded fee does not greatly reduce the risk posed by these cases. In many cases, the
11 prospect is nothing more than a potential that never materializes. First, you must win the case to
12 get a court-awarded fee; even those cases that seem strongest at the onset can be lost and
13 sometimes are lost. Second, there are always the pitfalls and unforeseen obstacles that arise along
14 the way, such as settlement offers that the client may accept without ensuring that we receive a
15 reasonable fee, or changes in the law that substantially affect the merits of the case, or other
16 uncertainties involving the client. Finally, there is the great risk inherent in advancing tens if not
17 hundreds of thousands of dollars in out-of-pocket expenses. If that money were to be invested in
18 some sort of financial investment, one would expect a reasonable rate of return on that investment.
19 Here, however, the best we can hope to recover is our money, and then only if we are substantially
20 successful; if we are not, all or part of this "investment" can be lost.

21 34. Class Counsel is well acquainted with the contingent-fee market throughout
22 California, particularly as it pertains to wage-and-hour and class-action litigation. Class Counsel
23 has negotiated numerous contingency-fee agreements with plaintiffs, both as individuals and as
24 representatives in class-action suits. Many of those agreements required that counsel receive a fee
25 under certain scenarios that exceed one-third of the recovery. Plaintiffs here signed a retainer
26 agreement indicating that Class Counsel could receive a fee under certain scenarios that exceed
27 one-third of the recovery, as much as 40%. Class counsel in contingency-fee cases typically
28 receive attorneys' fees equal to or greater than a third of the gross settlement amount. *See, e.g.,*

1 *Evans et al. v. Coca-Cola* (Los Angeles County Sup.Ct. 2001 Case No. BC 220525 (Hon. Richard
2 C. Hubbell)) (approving an award of attorney's fees of at least 33-1/3% of the settlement); *Moreno*
3 *v. Miller Brewing* (Los Angeles County Sup. Ct. April 2004 BC 278170 (Hon. David M.
4 Minning)) (same); and *Josiah Eaton, et al. v. Adolph Coors Company* (Orange County Sup. Ct.
5 2003 Case No. 01CC00140 (Hon. Stephen J. Sundvold)) (at least same award); *Daum v. Claim*
6 *Jumper Restaurants* (Orange County Sup. Ct. 2006 Case No. 02CC10201 (Hon. Ronald L.
7 Bauer)) (final approval of same); *Moore v. IKEA* (Los Angeles County Sup. Ct. 2006 Case No.
8 BC 263646 (Hon. Peter Lichtman)) (final approval of same); *Big Lots Overtime Cases* (San
9 Bernardino County Sup. Ct. February 2004, JCCP Proceeding No. 4283 (Hon. Walter L.
10 Blackwell, III)) (same); and *Fitzpatrick v. Baja Fresh* (Los Angeles Super. Ct. Case No. BC
11 265578 (Hon. Anthony J. Mohr)) (same). Thus, the fees requested in this case are commensurate
12 with fees routinely awarded in other wage and hour class action settlements.

13 35. Indeed, California courts have approved attorney's-fee awards in excess of the
14 benchmark of one-third of the settlement fund. *See Crandall v. U-Haul* (Los Angeles County Sup.
15 Ct., Case No. BC178775), the Honorable Steven Czuleger awarded a 40% attorney fee request in
16 an overtime-exemption class action; in *Bushnell v. Cremar, Inc.* (Orange County Sup. Ct., Case
17 No. 657778), the Honorable Donald E. Smallwood awarded attorneys' fees in the amount of 38%;
18 in *Abzug v. Kerkorian* CA000981 (Los Angeles County Sup. Ct., November 1990), the Honorable
19 R. William Schoettler awarded a 45% fee; in *Haitz v. Meyer, et al.*, Alameda County Sup. Ct., 8-
20 20-1990 No. 572968-3, the court awarded a 40% fee; in *Elliott v. Clothestime* (Orange County
21 Sup. Ct., Case No. 01-CC00333) the Honorable Jonathan Cannon awarded a 40% fee in a wage-
22 and-hour class action which had not yet proceeded to the class certification stage; in both *Rippee*
23 *v. Boston Market Corporation*, Case No.: 05 CV 1359 BTM (JMA) and *Barile v. Boston Market*
24 *Corporation*, Case No.: 05 CV 1360 BTM (JMA), the Honorable Judge Barry T. Moskowitz
25 awarded a 40% fee to plaintiff's counsel in wage-and-hour class actions that had not proceeded to
26 the class-certification stage.

27 36. In light of the foregoing, the fee request in an amount equal to one-third of the
28 Gross Settlement Amount (or \$833,333.33) is well within the bounds that have been established

1 by the above-cited authority. Defendant has no objection to an award of fees in the amount
2 requested. Moreover, the Class Notice mailed to Class Members stated the amount of fees
3 requested by Class Counsel; however, not a single Class Member has objected to an award of fees
4 in the amount requested.

5 **Costs**

6 37. The actual total costs incurred in litigating this Action for Class Counsel are
7 \$32,314.90. D.Law, Inc. and David Yeremian & Associates, Inc.'s Cost Log is attached hereto as
8 **Exhibit 2**. Aegis Law Firm, PC's Cost Log is attached as **Exhibit 1** to the Campbell Declaration
9 filed concurrently herewith. Class Counsel's incurred costs include, but are not limited to, filing
10 fees (e.g. complaint, stipulation, motions), service of process, mediation fees, and attorney-service
11 costs for court filings, all of which were necessarily and reasonably incurred to prosecute this
12 Action and achieve a settlement that significantly benefits the Class. Thus, Class Counsel requests
13 a reimbursement of their incurred costs in the amount of \$32,314.90.

14 **SERVICE PAYMENTS TO NAMED PLAINTIFFS ARE REASONABLE**

15 38. Plaintiffs are entitled to a reasonable service payment for their efforts and initiative
16 in bringing and helping to prosecute this Action. Plaintiffs assumed great risk by challenging
17 Defendant's wage-and-hour policies and bringing suit against Defendant. Plaintiffs spent time
18 better apprising themselves of their rights, deciding whether remedial action should be taken, how
19 it should be taken, searching for attorneys, and finally contacting their attorneys, who spent many
20 hours with them discussing their case, the law, and preparing for the mediation. In the end,
21 Plaintiffs decided to vindicate not only their own rights but also those of their fellow employees
22 by filing a class action lawsuit.

23 39. The courage it took to stand up to Defendant in this way should not be
24 underestimated. Few people want to confront their employers, let alone sue them. By suing their
25 former employer, Plaintiffs contend that they increased the risk of retaliation by prospective
26 employers to which they may apply in the future.

27 40. But Plaintiffs did not allow their fear of the potential repercussions of being a Class
28 Representative deter them from acting for the benefit of Class Members. They have devoted a

1 substantial amount of time to helping Class Counsel effectively develop and prosecute this Action
2 at every stage of the litigation. Plaintiffs conferred with Class Counsel on numerous occasions to
3 discuss every aspect of this case; provided information about Defendant and their wage-and-hour
4 practices; reviewed documents; produced documents; monitored the progress of the litigation;
5 took the time to apprise themselves of the facts, issues, and law regarding the claims at issue, and
6 spent time with Class Counsel discussing the terms of the Settlement and reviewing and executing
7 the Settlement Agreement. In all, Plaintiffs estimate that they have devoted numerous hours in
8 preparing the Action and seeing it through to settlement.

9 41. Plaintiffs spent a significant amount of time with Class Counsel detailing their
10 knowledge of Defendant's practices and assisting in the prosecution of this Action. They have
11 diligently, adequately, and fairly represented Class Members and have not placed their interests
12 above any member of the putative Class. Class Counsel believes that each Plaintiff is entitled to a
13 Class Representative Service Payment for the time and effort they have devoted to this case.
14 Defendant has agreed not to oppose it. Such payments to class representatives are a common
15 feature of settlements negotiated by Class Counsel, and trial courts routinely approve them. In
16 light of the foregoing, Class Counsel believes the Class Representative Service Payments in the
17 amount of \$10,000.00 to each Plaintiff (for a total of \$20,000.00) are fair and reasonable.

18 42. California trial courts routinely approve enhancement payments to class
19 representatives in wage-and-hour class-action settlements. *See, e.g., Bennett v. Countrywide*
20 *Financial Corporation* (2005) San Diego Sup. Ct. Case No. GIC840981 (\$35,000); *Hogue v. WH*
21 *Smith of Nevada, Inc.* (2004) San Diego Sup. Ct. Case No. GIC830653 (\$20,000); *Fiez v. Brown*
22 *Group Retail Inc., d.b.a. Famous Footwear* (2003) Orange County Sup. Ct. Case No. 01CC00381
23 (\$35,000 to current employee of defendant and \$20,000 to former employee); *Barry v. Cost Plus,*
24 *Inc.* (2003) OCSC No. 01CC00380 (\$35,000 for each named plaintiff); *Lajoie v. The Picture*
25 *People, Inc.* (2003) Orange County Sup. Ct. Case No. 01CC00324 (\$25,000 each for two named
26 plaintiffs); *Franco v. Vans, Inc.* (2002) Orange County Sup. Ct. Case No. 01CC03995 (\$35,000
27 for each named plaintiff); *Crandall v. U-Haul Corporation* (2001) Los Angeles Sup. Ct. Case No.
28 BC 178775 (\$20,000 for each named plaintiff); *Joel v. Athlete's Foot Group* (2001) Los Angeles

1 Sup. Ct. Case No. BC 234231 (\$25,000). Plaintiffs' Class Representative Service Payments
2 request is substantially less than the enhancements approved in these cases; therefore, it is
3 reasonable.

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

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9 Executed this 29th day of September 2025 at Glendale, California.

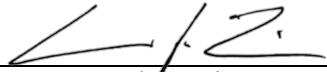
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EXHIBIT 1

Attorney	Total Time	Rate	Total Billable Amount
Alvin Lindsay	64	\$ 1,260.00	\$ 80,640.00
Melissa Rodriguez	57.9	\$ 475.00	\$ 27,502.50
David Yeremian	6.8	\$ 1,375.00	\$ 9,350.00
Arianna Razi	14	\$ 475.00	\$ 6,650.00
Enoch Kim	10.3	\$ 1,045.00	\$ 10,763.50
Total	153		\$ 134,906.00

Case Number	Case Title	Entry Date	Billable Time	Staff Name - (Full)	Note
207275	Hagerty v. Roseburg Forest Products Co	5/23/23	3.5	David Yeremian	Review intake, review client documents. Conference with client re facts and claims. Confer with staff re further interview of client and preparation of retainer and file opening documents.
207275	Hagerty v. Roseburg Forest Products Co	7/21/23	0.1	David Yeremian	Confer with staff re status of complaint.
207275	Hagerty v. Roseburg Forest Products Co	7/28/23	1.8	Alvin Lindsay	Review of intake documents and summary from co-counsel and review wage statements and other documents from Client. Draft notes and summarize claims and causes of action and supporting evidence. Research Roseburg Forest Products and company and services provided and locations.
207275	Hagerty v. Roseburg Forest Products Co	7/31/23	2.6	Alvin Lindsay	Review intake notes and claim summary and confer with SZ and NB regarding follow up questions and further claim details. Begin drafting complaint and PAGA Notice Letter to the LWDA. Further research on Defendants and claims and details on timekeeping and off the clock procedures.
207275	Hagerty v. Roseburg Forest Products Co	8/2/23	5.6	Alvin Lindsay	Complete drafting class action complaint and LWDA PAGA Notice Letter. Further research on defendants' locations and regarding venue and general and special jurisdiction. Research Agents used for jurisdiction/venue. Confer and correspond with NB and SZ regarding finalizing and filing complaint and finalizing and submitting Notice Letter and regarding proof of submission to the LWDA.
207275	Hagerty v. Roseburg Forest Products Co	8/16/23	1.4	Alvin Lindsay	Review case assignment documents and notice of ISC and research statement requirements and procedures. Confer and correspond with SZ and NB regarding case initiation docs and conformed copies and regarding service and status and confirming and filing proof of service.
207275	Hagerty v. Roseburg Forest Products Co	9/8/23	1.3	Alvin Lindsay	Review notice of related cases from OC and review other Fraley case - research ROA and LWDA database and ROA's for cases and draft notes and correspondence with team regarding other case and interaction and filing firm.
207275	Hagerty v. Roseburg Forest Products Co	9/8/23	1.3	Alvin Lindsay	Review notice of related cases from OC and review other Fraley case - research ROA and LWDA database and ROA's for cases and draft notes and correspondence with team regarding other case and interaction and filing firm.
207275	Hagerty v. Roseburg Forest Products Co	10/6/23	1.8	Alvin Lindsay	Draft First Amended Complaint. Research ROA and status and related case and notice and and regarding filing without a stipulation after an answer is filed. Review correspondence from OC and draft response regarding right to file amended complaint and timing and filing as a matter of right.
207275	Hagerty v. Roseburg Forest Products Co	10/6/23	1.8	Alvin Lindsay	Draft First Amended Complaint. Research ROA and status and related case and notice and and regarding filing without a stipulation after an answer is filed. Review correspondence from OC and draft response regarding right to file amended complaint and timing and filing as a matter of right.
207275	Hagerty v. Roseburg Forest Products Co	10/10/23	0.7	Alvin Lindsay	Correspond with OC regarding timing of ISC and filing of FAC and whether stipulation for leave is required. Research status of other case and download and review ROA .
207275	Hagerty v. Roseburg Forest Products Co	10/10/23	0.7	Alvin Lindsay	Correspond with OC regarding timing of ISC and filing of FAC and whether stipulation for leave is required. Research status of other case and download and review ROA .
207275	Hagerty v. Roseburg Forest Products Co	10/13/23	0.5	Alvin Lindsay	Review correspondence from OC regarding FAC and timing and stipulation required and confer with MR regarding drafting a set of formal discovery requests. Provide samples and guidance.
207275	Hagerty v. Roseburg Forest Products Co	10/13/23	0.5	Alvin Lindsay	Review correspondence from OC regarding FAC and timing and stipulation required and confer with MR regarding drafting a set of formal discovery requests. Provide samples and guidance.
207275	Hagerty v. Roseburg Forest Products Co	11/1/23	0.5	Alvin Lindsay	Review correspondence from OC and draft response. Research ROA and download LWDA letter and conformed initial filing docs and send to defense counsel. Confer with SZ regarding same.
207275	Hagerty v. Roseburg Forest Products Co	11/1/23	0.5	Alvin Lindsay	Review correspondence from OC and draft response. Research ROA and download LWDA letter and conformed initial filing docs and send to defense counsel. Confer with SZ regarding same.
207275	Hagerty v. Roseburg Forest Products Co	11/7/23	0.7	Alvin Lindsay	Conduct teleconference with OC and confer regarding continued time for responsive pleading and review correspondence regarding same
207275	Hagerty v. Roseburg Forest Products Co	11/7/23	0.7	Alvin Lindsay	Conduct teleconference with OC and confer regarding continued time for responsive pleading and review correspondence regarding same
207275	Hagerty v. Roseburg Forest Products Co	11/29/23	0.5	Alvin Lindsay	Review correspondence from OC and draft joint stip to continue responsive pleading and draft revisions and respond with instruction on finalizing and filing.
207275	Hagerty v. Roseburg Forest Products Co	11/29/23	0.5	Alvin Lindsay	Review correspondence from OC and draft joint stip to continue responsive pleading and draft revisions and respond with instruction on finalizing and filing.
207275	Hagerty v. Roseburg Forest Products Co	1/17/24	0.9	Alvin Lindsay	Review case file and correspondence from OC about other case by Aegis and review complaints and docs and draft correspondence regarding differences and correspond with DY regarding asking for a JPA and arguments for not staying our case pending theirs.
207275	Hagerty v. Roseburg Forest Products Co	1/17/24	0.7	David Yeremian	Confer with staff re prior filed case and potential for joint prosecution.
207275	Hagerty v. Roseburg Forest Products Co	1/17/24	0.9	Alvin Lindsay	Review case file and correspondence from OC about other case by Aegis and review complaints and docs and draft correspondence regarding differences and correspond with DY regarding asking for a JPA and arguments for not staying our case pending theirs.
207275	Hagerty v. Roseburg Forest Products Co	2/1/24	0.4	Melissa Rodriguez	Case organization, cmc; statement deadline; etc.
207275	Hagerty v. Roseburg Forest Products Co	2/1/24	0.1	Melissa Rodriguez	Draft/revise JPA
207275	Hagerty v. Roseburg Forest Products Co	2/2/24	2	Melissa Rodriguez	Draft/revise JPA
207275	Hagerty v. Roseburg Forest Products Co	2/2/24	0.9	Melissa Rodriguez	CMC 110
207275	Hagerty v. Roseburg Forest Products Co	2/5/24	0.6	Alvin Lindsay	Draft CMC statement and confer with SZ regarding finalizing and filing. Address JPA and review e-mail sending to CC for review.
207275	Hagerty v. Roseburg Forest Products Co	2/5/24	0.6	Alvin Lindsay	Draft CMC statement and confer with SZ regarding finalizing and filing. Address JPA and review e-mail sending to CC for review.
207275	Hagerty v. Roseburg Forest Products Co	2/8/24	0.4	Melissa Rodriguez	Plan and prepare for CMC hearing
207275	Hagerty v. Roseburg Forest Products Co	2/8/24	1.1	Melissa Rodriguez	Appear for/attend ISC. Informed judge that we intend to jointly prosecute the case.

Case Number	Case Title	Entry Date	Billable Time	Staff Name - (Full)	Note
207275	Hagerty v. Roseburg Forest Products Co	2/21/24	0.3	Melissa Rodriguez	Case organization
207275	Hagerty v. Roseburg Forest Products Co	2/28/24	0.4	Alvin Lindsay	Review correspondence from OC and CC regarding mediation and Hagerty participation and confer on case status with MR.
207275	Hagerty v. Roseburg Forest Products Co	2/29/24	0.4	Alvin Lindsay	Review correspondence from mediator regarding need to reschedule. Review dates and confer with CC regarding availability and scheduling preferences and review correspondence to mediator regarding same.
207275	Hagerty v. Roseburg Forest Products Co	3/1/24	0.6	Alvin Lindsay	Review JPA and signature status and confer with SZ regarding same and correspond with CC on JPA and signatures and status and timing. Address next steps and agreement from defense counsel on mediation and attendance.
207275	Hagerty v. Roseburg Forest Products Co	3/4/24	0.1	Melissa Rodriguez	case organization
207275	Hagerty v. Roseburg Forest Products Co	3/6/24	0.3	Alvin Lindsay	Confer and correspond with OC and CC regarding mediation rescheduling and timing and availability
207275	Hagerty v. Roseburg Forest Products Co	3/12/24	0.4	Alvin Lindsay	Confer and correspond with mediator and OC and CC regarding mediation rescheduling and with CC regarding informal discovery and JPA and with OC regarding conference scheduling to address mediation.
207275	Hagerty v. Roseburg Forest Products Co	3/13/24	0.6	Alvin Lindsay	Conduct teleconference with OC regarding mediation and concerns and case consolidation requirement and draft notes and correspondence to file.
207275	Hagerty v. Roseburg Forest Products Co	3/15/24	0.4	Alvin Lindsay	Review correspondence from OC and notes from conference with OC and draft correspondence to CC updating on teleconference and addressing consolidation of the two cases and the JPA.
207275	Hagerty v. Roseburg Forest Products Co	3/20/24	0.4	Alvin Lindsay	Review correspondence from CC regarding stipulation to consolidate and confer and correspond with MR regarding same and researching and which case to file in, etc.
207275	Hagerty v. Roseburg Forest Products Co	3/21/24	2.8	Melissa Rodriguez	Stipulation to consolidate cases
207275	Hagerty v. Roseburg Forest Products Co	3/21/24	0.3	Melissa Rodriguez	Reviewed complaint again; sent to ABL for revision
207275	Hagerty v. Roseburg Forest Products Co	3/28/24	0.7	Alvin Lindsay	Review correspondence and notes from conferences with OC and CC and address JPA and consolidation and timing and logistics. Draft correspondence to OC and to CC regarding mediation and consolidation.
207275	Hagerty v. Roseburg Forest Products Co	4/1/24	0.4	Alvin Lindsay	Review correspondence from Mediator regarding status of mediation and combining Hagerty into Fraley and joint stip to consolidate and other related issues.
207275	Hagerty v. Roseburg Forest Products Co	4/15/24	0.1	Melissa Rodriguez	email correspondence regarding mediation; calendared dates
207275	Hagerty v. Roseburg Forest Products Co	4/15/24	0.3	Alvin Lindsay	Correspond with OC and CC regarding mediation and with mediator regarding confirmation of date and payment status and logistics of consolidation. Review mediator notice and correspondence in response.
207275	Hagerty v. Roseburg Forest Products Co	4/22/24	0.1	Melissa Rodriguez	Looked at the JPA
207275	Hagerty v. Roseburg Forest Products Co	4/24/24	0.4	Alvin Lindsay	Review Defendant's CMC statement and confer and correspond with JP regarding same and status of mediation and consolidation into Fraley case.
207275	Hagerty v. Roseburg Forest Products Co	4/25/24	0.8	Melissa Rodriguez	Read emails; case org; CMC statement; correspondence with ABL
207275	Hagerty v. Roseburg Forest Products Co	4/25/24	0.4	Melissa Rodriguez	Class Notice; email correspondence with ABL;
207275	Hagerty v. Roseburg Forest Products Co	5/1/24	0.1	Melissa Rodriguez	correspondence to ABL regarding informal discovery; added to notes
207275	Hagerty v. Roseburg Forest Products Co	5/9/24	0.5	Melissa Rodriguez	Read email regarding CMC; searched NEOS and court website; correspondence with JL CMC statement; followed up with a call with ABL regarding the status conference and CMC;
207275	Hagerty v. Roseburg Forest Products Co	5/9/24	0.8	Melissa Rodriguez	Prepared for CMC and attended CMC conference; Court continued the conference for January 9, 2024 at 9:30 a.m. with joint statements to be filed
207275	Hagerty v. Roseburg Forest Products Co	5/9/24	0.1	Melissa Rodriguez	Email correspondence to ABL and SZ regarding CMC hearing
207275	Hagerty v. Roseburg Forest Products Co	5/9/24	0.5	Alvin Lindsay	Research status of filing CMC statement and confer with MR regarding same and appearance for CMC and results. Address next steps and consolidated with Aegis case.
207275	Hagerty v. Roseburg Forest Products Co	6/17/24	0.1	Melissa Rodriguez	Case organization; Reviewed emails and NEOS docs; Updated notes
207275	Hagerty v. Roseburg Forest Products Co	7/3/24	1	Melissa Rodriguez	Began drafting Informal Discovery request; referred to JPA; looked on court website to confirm cases were not consolidated;
207275	Hagerty v. Roseburg Forest Products Co	7/12/24	0.3	Melissa Rodriguez	Reviewed mediation info and JPA; asked ABL on how to proceed with brief and informal discovery; further correspondence with ABL regarding matter
207275	Hagerty v. Roseburg Forest Products Co	7/15/24	0.3	Melissa Rodriguez	Reviewed prior email chains, referenced JPA; correspondence with ABL; send email following up on informal discovery request and motion to consolidate
207275	Hagerty v. Roseburg Forest Products Co	7/15/24	0.3	Alvin Lindsay	Confer and correspond with MR regarding other case and consolidation and JPA and timing and review correspondence with CC and OC regarding same.
207275	Hagerty v. Roseburg Forest Products Co	7/16/24	0.4	Alvin Lindsay	Review correspondence from CC regarding informal discovery and review Defendants' response. Confer with CC regarding same and with MR regarding same and contributions to the brief for mediation and mediation preparation.
207275	Hagerty v. Roseburg Forest Products Co	7/16/24	0.7	Melissa Rodriguez	Began drafting informal discovery request - left off on rest break section
207275	Hagerty v. Roseburg Forest Products Co	8/13/24	0.5	Alvin Lindsay	Review correspondence from OC and CC regarding conference of counsel regarding mediation and stipulating to consolidation. research and review case status and timing of CMCs and attention to calendaring for conference. Confer with MR regarding same. Set up conference of counsel with OC and CC.
207275	Hagerty v. Roseburg Forest Products Co	8/15/24	0.8	Melissa Rodriguez	Call with OC and CC
207275	Hagerty v. Roseburg Forest Products Co	8/16/24	0.5	Alvin Lindsay	Confer and correspond with CC and MR and review correspondence regarding conference with OC on mediation and informal discovery and consolidation. Confer with MR regarding same and next steps. Address issues with PAGA liability period and production of full documents and sampling. Further address informal discovery and mediation prep.
207275	Hagerty v. Roseburg Forest Products Co	8/16/24	0.1	Alvin Lindsay	Confer and correspond with CC and MR and review correspondence regarding conference with OC on mediation and informal discovery and consolidation. Confer with MR regarding same and next steps. Address issues with PAGA liability period and production of full documents and sampling. Further address informal discovery and mediation prep.
207275	Hagerty v. Roseburg Forest Products Co	8/19/24	0.4	Alvin Lindsay	Review correspondence between OC and CC regarding consolidation and mediation and further mediation prep and confer with MR regarding same and supporting CC.

Case Number	Case Title	Entry Date	Billable Time	Staff Name - (Full)	Note
207275	Hagerty v. Roseburg Forest Products Co	9/4/24	0.3	Alvin Lindsay	Review correspondence and message regarding class member requesting update and confer with MR regarding same and response.
207275	Hagerty v. Roseburg Forest Products Co	9/9/24	0.4	Alvin Lindsay	Review correspondence from CC regarding informal discovery and status and mediation and draft response and confer with CC and MR regarding same.
207275	Hagerty v. Roseburg Forest Products Co	9/11/24	0.4	Alvin Lindsay	Review correspondence between OC and CC regarding mediation and preparation and status of production and informal discovery and confer with MR regarding same.
207275	Hagerty v. Roseburg Forest Products Co	9/18/24	0.4	Alvin Lindsay	Review correspondence from OC and phone message and confer and correspond with CC regarding status of consolidation and stipulating to it and status of mediation preparation.
207275	Hagerty v. Roseburg Forest Products Co	9/23/24	0.5	Alvin Lindsay	Conduct teleconference with OC regarding status of consolidation and reasons for hold up. Draft correspondence to OC and CC regarding same and agreement to consolidate and status of complaint and stipulation. Confer with MR regarding same and review correspondence and file docs for prior work to that end.
207275	Hagerty v. Roseburg Forest Products Co	9/24/24	0.4	Alvin Lindsay	Confer and correspond with OC and CC regarding consolidation and status and consolidated complaint and stipulation and confer with MR regarding same. Address informal discovery status and numbers.
207275	Hagerty v. Roseburg Forest Products Co	9/26/24	0.3	Alvin Lindsay	Review correspondence from CC regarding updating service list and regarding consolidating and position and status. Confer with MR regarding same.
207275	Hagerty v. Roseburg Forest Products Co	9/27/24	0.4	Alvin Lindsay	Confer and correspond with CC regarding OC demand to consolidate and address responsibilities and delegation and next steps. Confer with MR regarding same and next steps.
207275	Hagerty v. Roseburg Forest Products Co	9/30/24	0.4	Alvin Lindsay	Review correspondence from OC and CC regarding consolidation and logistics. Research template for consolidation stipulation and Order and send to OC and CC and address deferring consolidated complaint until post-mediation.
207275	Hagerty v. Roseburg Forest Products Co	10/2/24	0.6	Alvin Lindsay	Review correspondence from OC regarding mediation and not paying for mediation in the event there is no consolidation. Confer and correspond with OC and CC regarding same and what was sent and already provided and regarding stipulation rather than consolidated complaint and timing.
207275	Hagerty v. Roseburg Forest Products Co	10/8/24	0.8	Melissa Rodriguez	Reviewed joint stipulation and proposed order to consolidate cases; Made minor reviews; Correspond with ABL; Correspond with Co-counsel and asked if they could draft the consolidated complaint; correspond with OC regarding joint stipulation
207275	Hagerty v. Roseburg Forest Products Co	10/8/24	0.6	Alvin Lindsay	Review joint stipulation to consolidate and confer with MR regarding same and communicating with CC regarding same and consolidated complaint and logistics and timing for amendment. Conduct teleconference with MR regarding same and response to OC and CC and Word versions of complaints.
207275	Hagerty v. Roseburg Forest Products Co	10/9/24	1.9	Melissa Rodriguez	Drafted Consolidated Complaint; Correspond with ABL on how to proceed
207275	Hagerty v. Roseburg Forest Products Co	10/9/24	0.5	Alvin Lindsay	Review correspondence from CC and draft response and address responsibility for drafting joint stipulation and consolidated complaint and confer with MR regarding same. Review correspondence regarding informal production and draft response and review production docs and summarize for CC. Confer with MR regarding same.
207275	Hagerty v. Roseburg Forest Products Co	10/15/24	0.6	Melissa Rodriguez	Reviewed consolidated complaint; Email to Co-counsel asking for further revisions; Read email from OC; Email to OC; Updated him on consolidated complaint status and provided him with a joint stipulation draft;
207275	Hagerty v. Roseburg Forest Products Co	10/23/24	0.2	Melissa Rodriguez	Followed up on Second amended complaint with co-counsel
207275	Hagerty v. Roseburg Forest Products Co	10/28/24	0.4	Alvin Lindsay	Review correspondence from Mediator confirming mediation and brief timing and logistics. Confer with MR regarding same and coordinating with CC on brief and regarding consolidated complaint and revising draft to finalize.
207275	Hagerty v. Roseburg Forest Products Co	10/29/24	1	Melissa Rodriguez	Made revisions to Co-counsel's Second Amended Complaint in accordance with the JPA. Sent to supervising attorney for review
207275	Hagerty v. Roseburg Forest Products Co	10/29/24	0.3	Melissa Rodriguez	Correspond with supervising attorney regarding Second Amended Complaint; Further revisions to Second Amended Complaint; Sent to Co-counsel for their review.
207275	Hagerty v. Roseburg Forest Products Co	10/31/24	1.5	Melissa Rodriguez	Reviewed informal discovery production
207275	Hagerty v. Roseburg Forest Products Co	10/31/24	0.5	Alvin Lindsay	Conduct teleconference with MR regarding upcoming mediation and status of informal discovery and production. Confer regarding submitting brief and timing and drafting and expert analysis and review correspondence with CC regarding same. Confer with MR on status of stipulation and consolidated complaint. Further mediation prep.
207275	Hagerty v. Roseburg Forest Products Co	11/1/24	0.8	Melissa Rodriguez	Prepared for call with co-counsel; Call with Co-counsel for the Hagerty/Fraley v. Roseburg case. They agreed to take a lead on drafting the mediation brief and in exchange I agreed to take a lead on drafting the MOU/Settlement Agreement. However, they are still waiting on items from their expert. They said they will provide us with a draft over the weekend. I told her I will get her revisions by the end of the day Monday
207275	Hagerty v. Roseburg Forest Products Co	11/1/24	0.5	Alvin Lindsay	Review correspondence from CC and to CC from MR regarding mediation and mediation brief. Address drafting brief and expert analysis and status of informal production and agreement for us to draft settlement agreement and MOU. Confer with MR regarding same and response and next steps and further mediation prep.
207275	Hagerty v. Roseburg Forest Products Co	11/4/24	0.4	Alvin Lindsay	Review correspondence with CC and MR regarding conference of counsel and preparing for mediation and status of mediation brief and expert analysis. Confer with MR regarding same. Further mediation preparation.

Case Number	Case Title	Entry Date	Billable Time	Staff Name - (Full)	Note
					Call with co-counsel regarding the mediation; Discussed contents of mediation brief; Discussed expert analysis, facts of case, Defendant's failure to provide information, further information required by clients, consolidated complaint, etc.
207275	Hagerty v. Roseburg Forest Products Co	11/4/24	1.3	Melissa Rodriguez	Agreed to contact Defense counsel regarding missing data and responses to informal discovery request
					Email to OC - I attached the revised class action complaint consolidating the two actions that we intend on filing with the joint stipulation. Could you please confirm the total number of class members employed during the liability period, the total number of workweeks, the total number of aggrieved employees that were employed during the PAGA period, and the total number of pay periods? Additionally, we would appreciate it if you could let us know how many class members were covered by the working agreement. Thank you, and I look forward to your responses.
207275	Hagerty v. Roseburg Forest Products Co	11/4/24	0.1	Melissa Rodriguez	
207275	Hagerty v. Roseburg Forest Products Co	11/5/24	1.4	Melissa Rodriguez	Incorporated Defendant's suggestions to joint stipulation and complaint; Sent draft complaint with further modifications to co-counsel for their review; Provided co-counsel with numbers requested for mediation
207275	Hagerty v. Roseburg Forest Products Co	11/5/24	0.4	Alvin Lindsay	Review correspondence from MR to CC and OC regarding revisions to the consolidated complaint and regarding informal production and numbers and data. Confer with MR regarding same and interaction with CC for mediation brief and expert analysis and further mediation prep.
207275	Hagerty v. Roseburg Forest Products Co	11/5/24	1	Melissa Rodriguez	Made revisions to mediation brief; added language regarding facts and circumstances of our plaintiff
207275	Hagerty v. Roseburg Forest Products Co	11/6/24	0.1	Melissa Rodriguez	Call to client to discuss meditation; no answer; left a voicemail; Sent text to client reminding him about mediation and asking him to give me a call back.
207275	Hagerty v. Roseburg Forest Products Co	11/6/24	0.5	Alvin Lindsay	Review mediation brief and exhibits and correspondence regarding mediation with CC. Confer with MR regarding same and drafting MOU and regarding further mediation preparation and conferring with client.
207275	Hagerty v. Roseburg Forest Products Co	11/6/24	0.3	Melissa Rodriguez	Call with client went over questions regarding mediation; answered client's questions; went over fact alleged in complaint
207275	Hagerty v. Roseburg Forest Products Co	11/7/24	10.7	Melissa Rodriguez	Prepared and attended mediation with Alvin B. Lindsay, which ended in a mediator's proposal
207275	Hagerty v. Roseburg Forest Products Co	11/7/24	9.2	Alvin Lindsay	Review case file docs and correspondence and informal production docs. Review mediation brief and exhibits and expert analysis. Confer and correspond with CC and MR and DY and with OC and mediator regarding case and claims and valuation. Confer regarding mediator's proposal. Draft notes and correspondence to DY and team and file.
207275	Hagerty v. Roseburg Forest Products Co	11/7/24	1.5	David Yeremian	Confer with staff re mediation, valuation model, strengths and weaknesses of case.
207275	Hagerty v. Roseburg Forest Products Co	11/8/24	0.4	Alvin Lindsay	Review mediator's proposal and confer with DY and MR regarding same. Review notes drafted and send to the file and confer and correspond with CC regarding next steps.
207275	Hagerty v. Roseburg Forest Products Co	11/8/24	0.2	David Yeremian	Confer with staff re mediator's proposal.
207275	Hagerty v. Roseburg Forest Products Co	11/12/24	0.4	Alvin Lindsay	Review correspondence from mediator regarding acceptance of proposal from all sides. Confer and correspond with CC regarding same and split and drafting memorandum of understanding and timing.
207275	Hagerty v. Roseburg Forest Products Co	11/12/24	1.7	Melissa Rodriguez	Drafted and finalized Memorandum of Understanding following the Parties' acceptance of the mediator's proposal
207275	Hagerty v. Roseburg Forest Products Co	11/13/24	0.2	Melissa Rodriguez	Reviewed Settlement Agreement
207275	Hagerty v. Roseburg Forest Products Co	11/13/24	0.5	Alvin Lindsay	Review correspondence from CC regarding going with long form settlement agreement draft rather than MOU. Review agreement and draft revisions and confer and correspond with CC and MR regarding same.
207275	Hagerty v. Roseburg Forest Products Co	11/20/24	0.4	Alvin Lindsay	Review correspondence from CC to OC regarding status of review of settlement agreement. Confer regarding same with MR and further review of draft agreement with an eye on LASC Model version.
207275	Hagerty v. Roseburg Forest Products Co	12/3/24	0.3	Alvin Lindsay	Review correspondence between OC and CC regarding settlement agreement and review and revisions and draft correspondence to CC regarding status. Confer with MR regarding same.
207275	Hagerty v. Roseburg Forest Products Co	12/6/24	0.4	Alvin Lindsay	Confer and correspond with CC regarding status of settlement agreement and review from defense counsel and confer with MR regarding same and status and timing of MPA docs.
207275	Hagerty v. Roseburg Forest Products Co	12/19/24	0.4	Melissa Rodriguez	Drafted CM110 statement
207275	Hagerty v. Roseburg Forest Products Co	12/19/24	0.1	Melissa Rodriguez	Correspond ABL regarding status of CM110 and correspond with Sasha Zambrano regarding filing
207275	Hagerty v. Roseburg Forest Products Co	12/19/24	0.4	Alvin Lindsay	Review case management conference statement and confer with MR regarding same and with SZ regarding finalizing and filing and serving.
207275	Hagerty v. Roseburg Forest Products Co	1/6/25	0.3	Melissa Rodriguez	Read email; Reviewed and went over settlement agreement with client; answered client's questions; Asked Litigation assistant to send settlement agreement to client
207275	Hagerty v. Roseburg Forest Products Co	1/6/25	0.4	Alvin Lindsay	Review correspondence from OC regarding MOU and finalizing for signature and correspond with MR and SZ regarding signatures from client and co-counsel.
207275	Hagerty v. Roseburg Forest Products Co	1/8/25	0.4	Alvin Lindsay	Review correspondence with CC regarding MOU and signature and confer with SZ regarding status of firm and client signatures. Confer with MR regarding same and conferring with CC regarding support for approval motion docs and drafting and filing.
207275	Hagerty v. Roseburg Forest Products Co	1/9/25	0.6	Melissa Rodriguez	Prepared for CMC; Checked on the Status of Case; Reviewed Stipulation to consolidate and SAC and sent to Co-counsel for their review
207275	Hagerty v. Roseburg Forest Products Co	1/9/25	0.6	Melissa Rodriguez	Appeared for CMC; the judge set April 24, 2025 as the filing deadline for the motion for preliminary approval. Our CMC hearing is also scheduled for that same day at 9:30 a.m.
207275	Hagerty v. Roseburg Forest Products Co	1/9/25	0.1	Melissa Rodriguez	Informed co-counsel regarding CMC dates
207275	Hagerty v. Roseburg Forest Products Co	1/31/25	0.1	Melissa Rodriguez	Checked on status of the case; updated case notes

Case Number	Case Title	Entry Date	Billable Time	Staff Name - (Full)	Note
207275	Hagerty v. Roseburg Forest Products Co	2/3/25	0.4	Alvin Lindsay	Review MOU and correspondence regarding same and signatures from Plaintiffs and counsel and review correspondence regarding same with OC. Address status and timing of approval motion docs and responsibilities and timing and confer with MR regarding same and communicating to OC.
207275	Hagerty v. Roseburg Forest Products Co	2/4/25	0.1	Melissa Rodriguez	Correspond with Janet Linares regarding acceptance of mediator's proposal and status off case
207275	Hagerty v. Roseburg Forest Products Co	2/6/25	0.8	Melissa Rodriguez	Reviewed status of SAC: Stipulation; etc. Correspond with counsel on current progress and next steps
207275	Hagerty v. Roseburg Forest Products Co	2/10/25	0.1	Melissa Rodriguez	Reviewed status of case; Updated notes;
207275	Hagerty v. Roseburg Forest Products Co	2/10/25	0.1	Melissa Rodriguez	Reviewed status of case; Updated notes;
207275	Hagerty v. Roseburg Forest Products Co	2/10/25	0.1	Melissa Rodriguez	Reviewed status of case; Updated notes
207275	Hagerty v. Roseburg Forest Products Co	2/10/25	0.1	Melissa Rodriguez	Reviewed status of case; Updated notes
207275	Hagerty v. Roseburg Forest Products Co	2/12/25	0.4	Melissa Rodriguez	Confer with Opposing counsel regarding Joint stipulation to consolidate and SAC; Received consent from Counsel to sign on their behalf; Correspond with Evelyn Goode regarding filing
207275	Hagerty v. Roseburg Forest Products Co	2/12/25	0.4	Alvin Lindsay	Review correspondence with CC and stipulation and proposed order to consolidate the cases and file FAC and correspond with MR and EG regarding same and finalizing and filing.
207275	Hagerty v. Roseburg Forest Products Co	2/21/25	0.4	Alvin Lindsay	Review correspondence from CC regarding firm declaration and client declaration and status and confer with MR regarding responding and drafting docs.
207275	Hagerty v. Roseburg Forest Products Co	2/21/25	1.5	Melissa Rodriguez	Drafted Client declaration; Correspond with Alvin B. Lindsay regarding the same
207275	Hagerty v. Roseburg Forest Products Co	2/24/25	0.1	Melissa Rodriguez	Correspond with Alvin B. Lindsay regarding Hagerty Declaration
207275	Hagerty v. Roseburg Forest Products Co	2/24/25	0.2	Melissa Rodriguez	Confer in firm regarding declaration and status of case
207275	Hagerty v. Roseburg Forest Products Co	2/24/25	0.4	Alvin Lindsay	Review correspondence and draft declaration for client regarding motion for preliminary approval and address need for adequacy declaration for class counsel. Address finalizing and continuing with filing.
207275	Hagerty v. Roseburg Forest Products Co	2/24/25	0.1	Melissa Rodriguez	Correspond with co-counsel regarding filing of the Second Amended Complaint and Correspond with Evelyn Goode regarding same
207275	Hagerty v. Roseburg Forest Products Co	2/25/25	2.9	Melissa Rodriguez	Drafted and revised declarations for Enoch Kim and Plaintiff Hagerty; Correspond with co-counsel regarding SAC; Correspond with Evelyn Goode regarding same
207275	Hagerty v. Roseburg Forest Products Co	2/25/25	0.1	Melissa Rodriguez	Correspond in firm with Evelyn Goode regarding filing of SAC
207275	Hagerty v. Roseburg Forest Products Co	2/25/25	0.3	Melissa Rodriguez	Finalized client and firm declarations and sent to co-counsel for their review
207275	Hagerty v. Roseburg Forest Products Co	2/25/25	0.4	Alvin Lindsay	Review correspondence with CC and OC regarding Declarations from EK and Plaintiff in support of preliminary approval and confer with MR regarding same.
207275	Hagerty v. Roseburg Forest Products Co	2/25/25	0.2	Melissa Rodriguez	Correspond with co-counsel regarding MPA documents
207275	Hagerty v. Roseburg Forest Products Co	2/25/25	1.1	Enoch Kim	Review and revise supporting declarations for preliminary approval motion.
207275	Hagerty v. Roseburg Forest Products Co	2/25/25	0.3	Enoch Kim	Confer with MR re supporting declarations for preliminary approval motion.
207275	Hagerty v. Roseburg Forest Products Co	2/25/25	0.2	Enoch Kim	Review email correspondence from co-counsel and MR re supporting declarations for preliminary approval motion.
207275	Hagerty v. Roseburg Forest Products Co	2/26/25	1.3	Melissa Rodriguez	Drafted David Yeremian declaration and Haines Declaration for MPA
207275	Hagerty v. Roseburg Forest Products Co	2/26/25	0.5	Alvin Lindsay	Review correspondence from CC and EK and MR regarding declaration from client and EK for preliminary approval and regarding declarations from co-counsel and DY. Research past declarations and provide samples to EK and MR. Confer regarding same.
207275	Hagerty v. Roseburg Forest Products Co	2/26/25	0.4	David Yeremian	Review and revise declaration in support of preliminary approval.
207275	Hagerty v. Roseburg Forest Products Co	3/4/25	0.9	Enoch Kim	Reviewed and revised supporting declarations for preliminary approval motion.
207275	Hagerty v. Roseburg Forest Products Co	3/4/25	0.1	Melissa Rodriguez	Confer with Enoch Kim regarding Settlement Approval documents
207275	Hagerty v. Roseburg Forest Products Co	3/5/25	1.4	Melissa Rodriguez	Reviewed memorandum
207275	Hagerty v. Roseburg Forest Products Co	3/5/25	1.3	Melissa Rodriguez	Revised co-counsel's Memorandum; Emailed revisions to Enoch for final review; Email to co-counsel regarding status
207275	Hagerty v. Roseburg Forest Products Co	3/5/25	1	Enoch Kim	Review and analyze draft preliminary approval motion.
207275	Hagerty v. Roseburg Forest Products Co	3/13/25	2.2	Melissa Rodriguez	finalized MPA documents; confer with Enoch Kim regarding same; confer with Evelyn Goode regarding same
207275	Hagerty v. Roseburg Forest Products Co	3/13/25	1.1	Enoch Kim	Review and revise supporting declarations for preliminary approval motion.
207275	Hagerty v. Roseburg Forest Products Co	3/13/25	0.2	Enoch Kim	Confer with MR and AL re revisions to supporting declarations for preliminary approval motion.
207275	Hagerty v. Roseburg Forest Products Co	3/19/25	0.5	Melissa Rodriguez	Correspond with co-counsel regarding MPA declarations; confer with Evelyn Goode regarding same; confirmed hearing location; and update citations and sent to co-counsel for their review
207275	Hagerty v. Roseburg Forest Products Co	3/19/25	0.1	Melissa Rodriguez	Confer with Evelyn Goode regarding MPA Declarations
207275	Hagerty v. Roseburg Forest Products Co	3/19/25	0.4	Alvin Lindsay	Review correspondence from co-counsel regarding motion for preliminary approval documents filed and served. Review memorandum and order and correspondence and case file docs and JPA with CC.
207275	Hagerty v. Roseburg Forest Products Co	4/1/25	0.4	Alvin Lindsay	Review correspondence from OC regarding CMC statement and confer with MR and EK regarding status of CMC statement for Plaintiff Haggerty.
207275	Hagerty v. Roseburg Forest Products Co	4/1/25	0.2	Melissa Rodriguez	Confirmed MPA docs were filed
207275	Hagerty v. Roseburg Forest Products Co	4/23/25	0.3	Melissa Rodriguez	Prepare for Motion for Preliminary Approval Hearing - Checked for tentative; confer with Enoch Kim regarding hearing
207275	Hagerty v. Roseburg Forest Products Co	4/24/25	0.8	Melissa Rodriguez	Appeared and prepared for MPA
207275	Hagerty v. Roseburg Forest Products Co	4/24/25	0.1	Enoch Kim	Confer with MR re preliminary approval hearing.
207275	Hagerty v. Roseburg Forest Products Co	4/28/25	0.1	Melissa Rodriguez	Updated auxiliary checklist
207275	Hagerty v. Roseburg Forest Products Co	4/29/25	0.2	Melissa Rodriguez	Checked on case status; Updated Notes
207275	Hagerty v. Roseburg Forest Products Co	5/6/25	0.6	Melissa Rodriguez	Confer in firm regarding fully executed settlement agreement and confer with OC regarding same
207275	Hagerty v. Roseburg Forest Products Co	5/9/25	0.5	Melissa Rodriguez	Checked to see if we received Order Granting MPA; Asked Evelyn Goode to follow up; Correspond with Co-counsel regarding the administration process
207275	Hagerty v. Roseburg Forest Products Co	6/4/25	0.6	Melissa Rodriguez	Checked on status of case; confirmed we are on administration process is on track; Updated Notes; Confer with Evelyn Goode regarding calendaring
207275	Hagerty v. Roseburg Forest Products Co	6/5/25	0.4	Alvin Lindsay	Review correspondence from administrator regarding calculations and payments and allocations and timing. Address status of no escalator clause and verification and proceeding with settlement administration.

Case Number	Case Title	Entry Date	Billable Time	Staff Name - (Full)	Note
207275	Hagerty v. Roseburg Forest Products Co	6/6/25	0.4	Alvin Lindsay	Review correspondence from administrator regarding admin timeline and review notice and mailing documents. Confer regarding approval with CC and review responses from CC and OC to administrator.
207275	Hagerty v. Roseburg Forest Products Co	6/11/25	0.4	Alvin Lindsay	Review and research case status and settlement and approval and mediation follow up and draft notes and summary and confer with DY regarding same.
207275	Hagerty v. Roseburg Forest Products Co	6/11/25	0.2	David Yeremian	Review correspondence from staff re status of case.
207275	Hagerty v. Roseburg Forest Products Co	6/30/25	0.4	Alvin Lindsay	Review correspondence from administrator regarding report on opt outs and objection and admin status and identity of opt-out and review response and further correspondence regarding administration.
207275	Hagerty v. Roseburg Forest Products Co	7/16/25	0.2	David Yeremian	Review final declaration in support of final approval.
207275	Hagerty v. Roseburg Forest Products Co	7/23/25	0.4	Alvin Lindsay	Review correspondence from OC regarding administration and status and opt outs and objections. Confer with SZ regarding same.
207275	Hagerty v. Roseburg Forest Products Co	8/4/25	0.4	Alvin Lindsay	Review correspondence from administrator regarding status of notices and returns and objections and exclusions and confer with SZ regarding same.
207275	Hagerty v. Roseburg Forest Products Co	8/26/25	0.5	Alvin Lindsay	Review correspondence regarding status of preliminary approval and administration and review motion documents for preliminary approval and confer and correspond with Settlement Team regarding same and responsibility for filing motion for final approval.
207275	Hagerty v. Roseburg Forest Products Co	8/26/25	0.8	Enoch Kim	Review email from co-counsel re final approval motion; confer with team re drafting of final approval motion; review emails from administrator.
207275	Hagerty v. Roseburg Forest Products Co	8/27/25	0.2	Enoch Kim	Confer with AR re final approval motion.
207275	Hagerty v. Roseburg Forest Products Co	8/29/25	0.4	Alvin Lindsay	Review correspondence from administrator regarding finalizing declaration in support of administration and final approval. Review final calculations and allocations and JPA and confer with SZ and settlement team regarding same.
207275	Hagerty v. Roseburg Forest Products Co	9/3/25	1.5	Arianna Razi	Review and revise administrator's declaration in support of motion for final approval.
207275	Hagerty v. Roseburg Forest Products Co	9/3/25	0.4	Alvin Lindsay	Review correspondence from administrator regarding declaration in support of final approval. Review declaration and confer with settlement team regarding same and status and timing of approval motion timing.
207275	Hagerty v. Roseburg Forest Products Co	9/15/25	0.1	Arianna Razi	Review correspondence from co-counsel. Review court docket.
207275	Hagerty v. Roseburg Forest Products Co	9/15/25	0.4	Arianna Razi	Review JPA between DYA, D.Law, and co-counsel. Draft correspondence to co-counsel re: lodestar materials, final costs, and attorneys' fees request.
207275	Hagerty v. Roseburg Forest Products Co	9/15/25	0.6	Alvin Lindsay	Review correspondence with settlement team and ED regarding status of final approval docs and responsibility for drafting - and regarding referral from D.Law to CC and then also JPA split with DYA and CC. Confer with settlement team on status and timing of final approval motion docs and status of administration.
207275	Hagerty v. Roseburg Forest Products Co	9/15/25	1.3	Arianna Razi	Draft proposed final approval order and judgment granting final approval of class action and PAGA settlement.
207275	Hagerty v. Roseburg Forest Products Co	9/16/25	0.5	Arianna Razi	Draft DY's declaration in support of motion for final approval.
207275	Hagerty v. Roseburg Forest Products Co	9/16/25	0.4	Alvin Lindsay	Review case status and hours for Lodestar and confer with DY on hours from Trial Works and Neos. Draft correspondence regarding same and review past time entries and send updated time. Review correspondence with CC and settlement team regarding same.
207275	Hagerty v. Roseburg Forest Products Co	9/16/25	2.9	Arianna Razi	Draft EK's declaration in support of motion for final approval.
207275	Hagerty v. Roseburg Forest Products Co	9/16/25	0.1	Arianna Razi	Created exhibit list to be attached to EK's declaration in support of motion for final approval.
207275	Hagerty v. Roseburg Forest Products Co	9/18/25	3.8	Arianna Razi	Draft notice of motion and memorandum of points and authorities in support of motion for final approval.
207275	Hagerty v. Roseburg Forest Products Co	9/22/25	0.1	Arianna Razi	Draft correspondence to defense counsel re: motion for final approval and proposed order.
207275	Hagerty v. Roseburg Forest Products Co	9/22/25	1.6	Enoch Kim	Review final approval motion documents.
207275	Hagerty v. Roseburg Forest Products Co	9/24/25	0.6	Arianna Razi	Draft Plaintiff Hagerty's declaration in support of final approval.
207275	Hagerty v. Roseburg Forest Products Co	9/24/25	0.4	Arianna Razi	Review our co-counsel's declarations provided in support of the motion for final approval.
207275	Hagerty v. Roseburg Forest Products Co	9/24/25	0.1	Arianna Razi	Called Plaintiff Hagerty and left a voicemail message. Draft correspondence to Plaintiff Hagerty memorializing my voicemail message.
207275	Hagerty v. Roseburg Forest Products Co	9/24/25	0.9	Enoch Kim	Review correspondence from co-counsel re declarations; review plaintiff's declaration for final approval motion; confer with AR re costs incurred by class counsel; consider next steps.
207275	Hagerty v. Roseburg Forest Products Co	9/25/25	0.4	Arianna Razi	Make additional revisions to EK's declaration and memorandum of points and authorities in support of motion for final approval.
207275	Hagerty v. Roseburg Forest Products Co	9/26/25	1	Arianna Razi	Make additional revisions to memorandum of points and authorities, EK's declaration, and proposed order.
207275	Hagerty v. Roseburg Forest Products Co	9/26/25	0.1	Arianna Razi	Review correspondence from administrator. Review administrator's revisions to their declaration.
207275	Hagerty v. Roseburg Forest Products Co	9/26/25	0.1	Arianna Razi	Draft correspondence to defense counsel. Review defense counsel's response.
207275	Hagerty v. Roseburg Forest Products Co	9/25/25	0.3	Enoch Kim	Exchange emails with co-counsel re cost reimbursement.
207275	Hagerty v. Roseburg Forest Products Co	9/26/25	0.5	Alvin Lindsay	Review correspondence with OC regarding status of review of motion for final approval documents and timing. Review documents and confer with settlement team regarding same and timing for finalizing and filing.
207275	Hagerty v. Roseburg Forest Products Co	9/29/25	0.4	Alvin Lindsay	Review correspondence with OC and CC regarding defendant's review of final approval motion documents and status and confer with settlement team regarding timing of filing documents and hearing.
207275	Hagerty v. Roseburg Forest Products Co	9/29/25	1.6	Enoch Kim	Review and revise final approval motion documents.
207275	Hagerty v. Roseburg Forest Products Co	9/29/25	0.6	Arianna Razi	Finalize motion papers for filing.

EXHIBIT 2

Hagerty v. Roseburg Forest Products Co.
Litigation Costs

Service Date		Details		Provider		Amount
8/2/23		LWDA Letter		LWDA		\$ 75.00
8/9/23		Summons & Complaint		Rapid Legal		\$ 1,673.75
8/10/23		Process of Service - Summons & Complaint		Rapid Legal		\$ 82.40
8/17/23		POS of Summons		Rapid Legal		\$ 92.70
9/15/23		Notice of Association of Counsel		Rapid Legal		\$ 190.55
10/9/23		First Amended Complaint		Rapid Legal		\$ 231.75
2/5/24		Case Management Statement		Rapid Legal		\$ 293.55
2/8/24		Order Granting Remote Appearance & Notice of Remote Appearance		Rapid Legal		\$ 190.50
4/16/24		Notice of Posting Jury Fees		Rapid Legal		\$ 345.05
10/16/24		(Rejected) Notice of Change of Address		Rapid Legal		\$ 11.33
10/18/24		Mediation Fee		Gig Kyriacou		\$ 4,560.00
10/21/24		Notice of Change of Address		Rapid Legal		\$ 14.94
12/23/24		Case Management Statement		Rapid Legal		\$ 14.94
2/14/25		Stipulation & Order		Rapid Legal		\$ 35.54
FUTURE		Motion for Final Approval of Settlement		Rapid Legal		\$ 85.00
FUTURE		Ntc of Entry of Final Order & Judgment		Rapid Legal		\$ 18.00

Total	\$ 7,915.00
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