

JCL LAW FIRM, APC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

LUIS A. RENDON, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

HEALTHCARE INVESTMENTS, INC. (dba
Rosecrans Care Center), a California
Corporation; and Does 1 through 50, Inclusive,

Defendants.

Case No: 20STCV39775

Action Filed: October 10, 2020

**DECLARATION OF JEAN-CLAUDE
LAPUYADE, ESQ. IN SUPPORT OF
PLAINTIFF'S MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Date: May 31, 2022

Time: 8:30 a.m.

Reservation ID: 162345658677

Dept.: 72

Judge: Hon. Curtis A. Kin

1 I, JEAN CLAUDE LAPUYADE, declare as follows:

2 1. I am the managing partner of JCL Law Firm, APC, and co-counsel of record for Plaintiff
3 BRITTNEY JONES, on behalf of herself, and on behalf of all persons similarly situated, and in her
4 representative capacity on behalf of the State of California and fellow Aggrieved Employees,
5 (“Plaintiff”) in this matter. As such, I am fully familiar with the facts, pleadings and history of the
6 matter.

7 2. I am submitting this declaration in support of Plaintiff’s Motion for Approval of PAGA
8 Settlement.

9 **I. EXHIBITS**

10 3. Attached hereto as **Exhibit “A”** is a true and correct copy of the JCL Law Firm, APC’s
11 “Transaction Summary” detailing Settlement Counsel’s actually incurred litigation expenses for this
12 matter as of May 5, 2022. As shown in detail in the attached transaction summary, Counsel has
13 incurred a total of \$8,458.03 in litigation costs prosecuting this action. I anticipate incurring an
14 additional \$150 - \$200 for the filing, service and appearance at this motion.

15 4. Attached hereto as **Exhibit “B”** is a true and correct copy of the Time and Billing Journal
16 for the attorneys and staff at the JCL Law Firm, APC. To the best of my knowledge, each entry was
17 made contemporaneously by the applicable attorney and/or staff members and in the ordinary course
18 of their usual course of business. The attached Billing Journal shows that the JCL Law Firm, APC,
19 billed a total of 91.06 hours for a total of \$41,406.67 successfully litigating this action at \$550 per hour
20 for attorney Jean-Claude Lapuyade, Esq., and at \$125 for case paralegal Tesla Stone.

21 5. The JCL Law Firm’s rates are comparable to those judicially approved for other
22 plaintiff’s firms, such as Baron & Budd (rates ranging from \$775 for the requested partner to \$390-
23 \$630 for non-partners), Western Comden Casselman & Essensten (rates ranging from \$670-\$750 for
24 partners and \$300-\$500 for associates), and Blood Hurst & Rearden (\$510-\$695 for partners). See
25 Aarons v. BMW of North America, No. 11-7667-PSG, 2014 U.S. Dist. LEXIS 118442, *40-41 (C.D.
26 Cal. Apr. 29, 2014). Other Southern California courts have approved hourly rates in the requested
27 range. See e.g., Kearney v. Hyundai Motor Am., 2013 U.S. Dist. LEXIS 91636, *24 (C.D. Cal. June
28

28, 2013) (approving hourly rates of \$650 -\$800 for senior attorneys in consumer class action); Parkinson v. Hyundai Motor America, 796 F.Supp.2d 1160, 1172 (C.D. Cal. 2010)(approving hourly rates between \$445 and \$675); Faigman v. AT&T Mobility, LLC, 2011 U.S. Dist. LEXIS 15825, *2 (N.D. Cal. Feb. 15, 2011)(Approving hourly rates of \$650 an hour for partners and \$500 for associates); Richard v. Ameri-Force Mgmt. Servs., Inc., No 37-2008-00096019 (San Diego Superior Court, August 27, 2010)(\$695 to \$750 an hour for partners and \$495 for associates); Barrera v. Gamestop, No. CV 09-1399 (C.D. Cal. Nov. 29, 2010)(\$700 for partners and \$475 for associates); Anderson v. Nextel Retail Stores, LLC, No. CV 07-4480 (C.D. Cal. June 20, 2010)(\$655- \$750 for partners and \$300 – 515 for associates); Luquetta v. Regents of Cal., CGC-05-443007 (San Francisco Sup. Ct.) (approving 2012 partner rates between \$550 and \$850 per hour); and Holoway v. Best Buy Co., C-05-5056-PJH (MEJ)(N.D. Cal.)(approving 2011 partner rates between \$825 and \$700, and associates hourly rates between \$355 and \$405 an hour).

6. Moreover, my billing rate has been approved multiple times within the last several months by California Superior Court judges. (*See generally Rodriguez v. RSI Home Products, Inc.*, San Bernardino Superior Court Case No. CIVDS 2023354 (July 30, 2021 – Hon. David Cohn approved \$550 billing rate and appointed Jean-Claude Lapuyade, Esq. as Counsel in a \$1,450,000 wage and hour class action settlement); *Nunes v. Home Depot U.S.A., Inc.*, San Joaquin Superior Court Case No. STK-CV-UOE-2020-0011011 (October 20, 2021 – Hon. Roger Ross approved \$550 billing rate and appointed Jean-Claude Lapuyade, Esq. as Counsel in a \$1,500,000 wage and hour class action settlement); *Pillsbury v. T&T Restaurants CA, Inc.*, Del Norte Superior Court Case No. CVUJ-20-1214 (December 14, 2021 – Hon. Darren McElfresh approved \$550 billing rate and appointed Jean-Claude Lapuyade, Esq. as Counsel in a wage and hour class action settlement); *Elias Kaser v. Aviation Consultants, Inc.*, Orange County Superior Court Case No. 30-2021-01191204-CU-OE-CXC (September 22, 2021 – Hon. Peter J. Wilson approved \$550 billing rate in a representative California Labor Code Private Attorney General Act settlement).

1 7. Further, Counsel will be performing additional work, including finalizing the orders and
2 judgment and monitoring the completion of the settlement process over the course of the next coming
3 months.

4 8. All of Counsel's out-of-pocket expenses are the types of expenses normally charged to
5 paying clients including the following: filing fees; copying; telephone; postage; factual and legal
6 research charges; mediation fees; expert costs and travel expenses, which were all incurred during, and
7 were necessary for the successful prosecution of, the litigation and, therefore, should be reimbursed.

8 9. Counsel now requests reimbursement for those incurred litigation expenses and costs as
9 provided for in the Settlement Agreement and based upon Counsel's billing records.

10 **II. JCL LAW FIRM EXPERIENCE**

11 10. Counsel in this matter has extensive class action and PAGA experience in multiple fields
12 and has represented tens-of-thousands of persons in class actions and PAGA matters. Counsel has
13 previously litigated similar wage and hour class actions involving similar meal and rest period
14 violations. Counsel has been approved as class counsel in similar wage and hour actions throughout
15 the State of California, including in the Superior Court for the County of San Diego. As such, courts
16 throughout the California have deemed Counsel experienced and knowledgeable in this area of law.
17 Counsel has participated in every aspect of the settlement discussions and has concluded the settlement
18 is fair, adequate and reasonable and in the best interests of the Class.

19 11. Plaintiff and the Aggrieved Employees are represented by competent and experienced
20 counsel to pursue their claims. I established the JCL Law Firm, APC ("Firm"), in 2010. The Firm is
21 a boutique plaintiff firm representing aggrieved employees and consumers throughout California in
22 wage and hour class actions, PAGA Actions and complex multi-party product liability matters. The
23 Firm currently consists of myself, Jean-Claude Lapuyade, Esq. (Partner/Owner), Eduardo Garcia
24 (Associate), Tesla Stone (Paralegal), and Leilani Edmunds (Legal Secretary).

25 12. I am qualified to represent the Plaintiff, the State of California and the Aggrieved
26 Employees. I have extensive experience with wage and hour class and representative actions litigation
27 like this matter, and employment matters in general. Additionally, I have extensive complex mass tort
28

1 litigation experience and complex construction product liability experience. I can, will and have
2 adequately represented the interests of the Plaintiff, the State of California and the Aggrieved
3 Employees throughout this action.

4 13. I have represented consumers and employees in California class actions, and complex
5 multi-party product liability actions exclusively for more than 13 years. I have been in practice as a
6 plaintiffs' civil litigation attorney since April 2007.

7 14. I have significant class counsel and collective action counsel experience. I served as class
8 and/or collective (PAGA) counsel in, among other cases, the following matters:

9 a. *Munoz v. AMTCR*, San Bernardino Superior Court Case No. CIV-DS2001914
10 (August 24, 2021) Hon. David Cohn approved a \$1.8 million dollar class and PAGA
11 settlement for, *inter alia*, inaccurate itemized wage statements. The JCL Law Firm, APC
12 acted as class counsel for the settlement class and as representative PAGA counsel the
13 State of California and the Aggrieved Employees.)

14 b. *Nunes v. Home Depot U.S.A., Inc.*, San Joaquin Superior Court Case No. STK-
15 CV-UOE-2020-0011011 (October 20, 2021 – Hon. Roger Ross approved a \$1.5 million
16 dollar class and PAGA settlement for, *inter alia*, miscalculated meal period premiums
17 and appointed Jean-Claude Lapuyade, Esq, as Class Counsel.)

18 c. *Pillsbury v. T&T Restaurants CA, Inc.*, Del Norte Superior Court Case No.
19 CVUJ-20-1214 (December 14, 2021 – Hon. Darren McElfresh approved \$550 billing
20 rate and appointed Jean-Claude Lapuyade, Esq, as Class Counsel in a wage and hour
21 class action settlement.)

22 d. *Rodriguez v. RSI Home Products, Inc.*, San Bernardino Superior Court Case No.
23 CIVDS2023354 (July 30, 2021 – Hon. David Cohn approved a \$1.45 million class and
24 PAGA settlement for, *inter alia*, failure to comply with piece-rate laws, and appointed
25 the JCL Law Firm, APC as Class Counsel)

26 e. *Elias Kaser v. Aviation Consultants, Inc.*, Orange County Superior Court Case
27 No. 30-2021-01191204-CU-OE-CXC (September 22, 2021 – Hon. Peter J. Wilson
28

1 approved \$550 billing rate in a representative California Labor Code Private Attorney
2 General Act settlement).

3 f. *Jer Vang v. Bridge Property Management*, Alameda County Superior Court,
4 Case No RG19047434 (January 8, 2021 – Hon. Winifred Smith approved a class and
5 PAGA settlement for, *inter alia*, unpaid off the clock work. The JCL Law Firm, APC
6 acted as class counsel for the settlement class and as representative PAGA counsel the
7 State of California and the Aggrieved Employees.)

8 g. *Johnson v. Volt Management Corp., Inc. et al.*, Los Angeles County Superior
9 Court, Case No. 19STCV16466 (December 11, 2020 – Hon. Amy Hogue approved a
10 PAGA Settlement negotiated on behalf of the State of California and the aggrieved
11 employees by the JCL Law Firm, APC.)

12 h. *Salazar v. Frontier Auto Sales Inc., dba Frontier Toyota*, Los Angeles Superior
13 Court, Case No. 19STCV20382 (November 24, 2020 – Hon. John P. Doyle appointed
14 the JCL Law Firm, APC as class counsel and approved a class and PAGA settlement
15 for, *inter alia*, missed meal and rest periods.)

16 i. *Villalobos v. Alterra Group, LLC et al.*, Los Angeles County Superior Court,
17 Case No. 19STCV19448 (November 11, 2020 – Hon. Richard Fruin approved a PAGA
18 Settlement for, *inter alia*, unreimbursed business expenses. The JCL Law Firm, APC
19 acted as counsel for the plaintiff, the State of California and the Aggrieved Employees.)

20 j. *Stevens et al., v. Bank of England*, San Diego County Superior Court Case No.
21 37-2019-00018662-CU-OE-CTL (October 16, 2020 – Hon. John Meyer appointed JCL
22 Law Firm as Class Counsel and granted final approval of wage and hour class action for,
23 *inter alia*, off-the-clock work.)

24 k. *Frazier v. ASA Carlton, Inc.*, San Diego Superior Court Case No. 37-2019-
25 00036147 (October 9, 2020 Hon. Kenneth Medel appointed the JCL Law Firm as Class
26 Counsel and granted final approval of wage and hour class action for off-the-clock
27 work.)

1 l. *Krake et al., v. Central Valley Diner, Inc.*, Placer County Superior Court Case
2 No. SCV0041645 (September 4, 2020 – Hon. Michael Jones appointed JCL Law Firm
3 as class counsel and granted final approval of wage and hour class action for meal period
4 violations.)

5 m. *Conner v. Ascendant Marketing, LLC et al.*, San Diego Superior Court Case No.
6 37-2019-00026864-CU-OE-CTL (July 24, 2020 Hon. Joel Wohlfeil granted approval of
7 PAGA Settlement for, among other things, off-the-clock work. JCL Law Firm, APC
8 acted as lead counsel.)

9 n. *Guerrero v. Estancia Operations, LLC.*, San Diego Superior Court Case No. 37-
10 2019-00028963 (August 25, 2020 – Hon. Katherine Bacal approved PAGA Settlement
11 for, *inter alia*, missed meal and rest periods. JCL LAW Firm, APC, acted as lead
12 counsel.)

13 o. *Moreno v. Dash Lube, et al.*, United States District Court, Southern District of
14 California, Case No. 18cv1922 DMS (AHG) (December 13, 2019 – Granted class
15 certification of Labor Code Section 226 claim and appointed JCL Law Firm, APC, as
16 Class Counsel.)

17 p. *Perkins et al., v. Tahiti Enterprises, Inc., et al.*, Orange County Superior Court
18 Case No. 30-2016-00863095 (October 22, 2019 – Hon. Peter Wilson appointed JCL Law
19 Firm, APC, as Class Counsel and granted final approval for an unlawful housing class
20 action settlement arising out of Civil Code Section 1940.1.)

21 q. *Hill v. Stemak Holdings, Ltd.*, San Diego Superior Court Case No., 37-2018-
22 00000747 (January 28, 2020 – Hon. Kenneth Medel appointed JCL Law Firm, APC as
23 class counsel and granted final approval of wage and hour class action for unpaid
24 overtime.)

25 r. *Shachno et al., v. KT Hotels, LLC, et al.* San Diego Superior Court Case No Case
26 No. 37-2018-00043601 (May 31, 2019 – Hon, Gregory Pollack appointed JCL Law
27 Firm, APC, as Class Counsel and granted preliminary approval for the wage and hour
28

1 class action settlement involving nearly 900 current and former employees. Final
2 approval scheduled for October 4, 2019)

3 s. *Almanza v. The Express Group, Inc.*, San Bernardino Superior Court Case No.
4 CIVDS1722542 (April 19, 2019 – Hon. David Cohn appointed the JCL Law Firm, APC,
5 as Class Counsel and granted final approval for a wage and hour class action settlement
6 for *inter alia*, missed meal and rest periods and independent contractor
7 misclassification.)

8 t. *Moschetto v. Pillow Global, Inc. San Diego Superior Court*, Case No. 37-2017-
9 00024031-CU-OE-CTL (April 5, 2019 – Hon. John S. Meyer appointed JCL LAW Firm,
10 APC, as Class Counsel and granted final approval for a wage and hour wage class action
11 settlement involving misclassified house cleaners.)

12 u. *Burke v. Friendship Hotel, LLC*, San Diego County Superior Court Case No. 37-
13 2017-00022517-CU-OE-CTL (March 10, 2019 – final approval granted on for an
14 unlawful housing class action arising under Civil Code Section 1940.2)

15 v. *Terrado et al., v. Accredited Debt Relief, LLC*, San Diego County Superior Court
16 Case No. 37-2018-00014181-CU-OE-CTL (February 8, 2019 – Hon. Gregory W.
17 Pollock appointed JCL Law Firm, APC as Class Counsel and granted final approval for
18 a wage and hour class action settlement for meal and rest period violations);

19 w. *Macaspac v. San Antonio Regional Hospital*, San Bernardino Superior Court
20 Case No. CIVDS1512625, (July 27, 2018 – Hon. Thomas S. Garza appointed JCL Law
21 Firm, APC, as Class Counsel and granted final approval for a wage and hour class action
22 settlement involving claims for on duty meal and rest periods.);

23 x. *Summerlin et al. v. Maplebear, Inc. dba Instacart*, Los Angeles Superior Court
24 Case No. BC603030 (2018 - certified and settled wage and hour class action.)

25 y. *Ortega v. Prime Healthcare*, San Diego Superior Court Case No. 37-2014-
26 00011240-CU-OE-CTL (2018 – Approved PAGA only settlement for on duty meal and
27 rest periods)

1 z. *Engstrom v. Bender-Rosenthal, Inc.* San Diego Superior Court Case No. 37-
2 2016-00012373-CU-OE-CTL (2017 - Certified and settled class action for employee
3 misclassification);

4 aa. *Crawford v. Outlook Amusements, Inc.*, Los Angeles Superior Court Case No.
5 BC617160 (2017 - Certified and settled wage and hour class action.);

6 bb. *Hernandez v. Sunglass Hut Trading, LLC*, San Bernardino Superior Court Case
7 No. CIVDS1505181 (2016 - Certified and settled wage and hour class action);

8 cc. *Burns v. Shalom, LLC*, San Diego Superior Court, Case No., 37-2013-00058356-
9 CU-BT-CTL (2015 - certified and settled class action for unlawful housing practices
10 arising out of Civil Code Section 1940.1);

11 15. Since 2010, I have successfully tried two (2) cases to conclusion, each resulting in a
12 favorable verdict for the firm's clients.

13 16. Finally, I have published appellate experience in *William Blanchette et al., v. The*
14 *Superior Court of Imperial County, (GHA Enterprises)*, 8 Cal.App.5th 521.

15 17. Consequently, I was named to the prestigious Thomson Reuters, Super Lawyers, Rising
16 Star in 2015, 2016, 2017 and, again, in 2018. According to Thomson Reuters, the Super Lawyers, Rising
17 Star list recognizes the top 2.5% of eligible attorneys. (see
18 https://www.superlawyers.com/about/selection_process.html.)

19 I declare under penalty of perjury under the laws of the State of California that the foregoing is
20 true and correct. Executed this 5th day of May 2022, at San Diego, California.

21
22 **JCL LAW FIRM, APC**

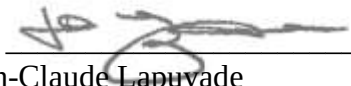
23 By: 
24 Jean-Claude Lapuyade
25 Attorneys for Plaintiff
26
27
28

EXHIBIT A

JCL Law Firm

Transaction Report

All Dates

DATE	TRANSACTION TYPE	NUM	NAME	MEMO/DESCRIPTION	ACCOUNT	SPLIT	AMOUNT	BALANCE
Rendon v. Healthcare Invest (002-129)								
10/04/2020	Check	2297	JAMS	Mediation	Client costs deferred	US Bank- Checking - 4270	2,637.50	2,637.50
10/31/2020	Journal Entry	OCT. 2020 Postage		Copies for Oct. 2020	Client costs deferred	-Split-	0.20	2,637.70
11/02/2020	Check	2317	Berger Consulting Group	Rendon v. Healthcare Investments Analysis (7.5 hours @\$135 per hour)	Client costs deferred	US Bank- Checking - 4270	506.25	3,143.95
11/07/2020	Check	2319	Knox Attorney Services, Inc.	Invoice No. 4327428 Re: Filing Fee: Summons; Complaint; Civil Case Cover Sheet	Client costs deferred	US Bank- Checking - 4270	508.25	3,652.20
11/09/2020	Expense		Knox Attorney Services, Inc.	Invoice 4327428 - Re: Filing Fee: Summons; Complaint; Civil Case Cover Sheet	Client costs deferred	Chase Card 7349	508.25	4,160.45
11/13/2020	Expense		Stanley Mosk Court		Client costs deferred	Chase Card 7349	7.50	4,167.95
11/30/2020	Journal Entry	Nov. 2020 Postage		Copies for Nov. 2020	Client costs deferred	-Split-	0.40	4,168.35
02/16/2021	Expense		One Legal LLC	One Legal Order Number: 15874206 - Filing Fee: Case Management Statement, Proof of Service	Client costs deferred	Chase Card 7349	16.20	4,184.55
02/28/2021	Journal Entry	Feb. 2021 Postage		Copies for Feb. 2021	Client costs deferred	-Split-	0.10	4,184.65
04/30/2021	Journal Entry	Apr. 2022 Postage		Copies for Apr. 2021	Client costs deferred	-Split-	0.20	4,184.85
05/04/2021	Check	2458	JAMS	Invoice #5686862- Mediation	Client costs deferred	US Bank- Checking - 4270	3,725.00	7,909.85
05/31/2021	Journal Entry	May 2021 Postage		Copies for May 2021	Client costs deferred	-Split-	0.10	7,909.95
08/11/2021	Check	2546	JAMS	Invoice #5686862 - Mediation	Client costs deferred	US Bank- Checking - 4270	3,725.00	11,634.95
09/29/2021	Check	2586	Berger Consulting Group	Invoice No. 4794	Client costs deferred	US Bank- Checking - 4270	112.50	11,747.45
10/12/2021	Expense		One Legal LLC	One Legal Order Number: 17049946 - Filing Fee Re: Notice of Change of Address or Other Contact Information	Client costs deferred	Chase Card 7349	16.68	11,764.13
10/28/2021	Check	2622	Creal & Creal	Review Financial Data	Client costs deferred	US Bank- Checking - 4270	356.25	12,120.38
11/12/2021	Deposit		Rendon v. Healthcare Invest (002-129)	Jams Refund	Client costs deferred	US Bank- Checking - 4270	-3,725.00	8,395.38
11/15/2021	Journal Entry	Sept 2022 Postage		Copies for Sep 2021	Client costs deferred	-Split-	0.50	8,395.88
11/30/2021	Journal Entry	Nov 2021 Postage		Copies for Nov 2021	Client costs deferred	-Split-	0.50	8,396.38
02/23/2022	Expense		LA Court E-File	Filing Fee	Client costs deferred	Chase Card 7349	61.65	8,458.03
Total for Rendon v. Healthcare Invest (002-129)							\$8,458.03	
TOTAL							\$8,458.03	

EXHIBIT B

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
Rendon v. Healthcare Invest (002-129)							
04/08/2020	No	Jean Claude Lapuyade	Fact Investigation - Client Intake	550.00	1:06	605.00	605.00
04/10/2020	No	Jean Claude Lapuyade	Fact Investigation - Reviewed Client Documents	550.00	2:06	1,155.00	1,760.00
04/13/2020	No	Jean Claude Lapuyade	Legal Research - 226 Claims, On Premises Rest	550.00	2:30	1,375.00	3,135.00
04/15/2020	No	Tesla Stone	Save CFA; Sort & Save Docs; Set up a new Case File; File Maintenance	150.00	1:30	225.00	3,360.00
04/15/2020	No	Jean Claude Lapuyade	TCW Client Re Claim Analysis and Fee Agreement	550.00	0:42	385.00	3,745.00
04/23/2020	No	Jean Claude Lapuyade	Legal Research - PAGA Pre-Filing Requirements	550.00	1:30	825.00	4,570.00
04/30/2020	No	Jean Claude Lapuyade	Reviewed, Edited and Finalized LWDA Notice	550.00	1:54	1,045.00	5,615.00
05/01/2020	No	Tesla Stone	Draft PAGA Letter; Mail & Submit; File Maintenance	150.00	1:30	225.00	5,840.00
05/18/2020	No	Jean Claude Lapuyade	TCW OC Re Pleading Status and Mediation	550.00	0:30	275.00	6,115.00
06/04/2020	No	Jean Claude Lapuyade	TCW OC Re Tolling Agreement	550.00	0:24	220.00	6,335.00
06/22/2020	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	6,350.00
07/01/2020	No	Tesla Stone	Draft & Serve Tolling Agreement; File Maintenance	150.00	1:30	225.00	6,575.00
09/15/2020	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	6,590.00
09/28/2020	No	Tesla Stone	Sort & Save DEF Docs; File Maintenance	150.00	0:30	75.00	6,665.00
09/29/2020	No	Jean Claude Lapuyade	Legal Research 226 Claim for Mediation Brief	550.00	4:18	2,365.00	9,030.00
10/01/2020	No	Jean Claude Lapuyade	TCW OC Re Mediation Data	550.00	0:18	165.00	9,195.00
10/14/2020	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	9,210.00
10/14/2020	No	Jean Claude Lapuyade	Legal Research 226 Issues	550.00	4:00	2,200.00	11,410.00
10/15/2020	No	Tesla Stone	File Maintenance; Circulate	150.00	0:06	15.00	11,425.00
10/15/2020	No	Tesla Stone	Draft; File and Serve Complaint; File Maintenance	150.00	2:00	300.00	11,725.00
10/16/2020	No	Jean Claude Lapuyade	Drafted Mediation Brief	550.00	3:30	1,925.00	13,650.00
10/16/2020	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	13,665.00
10/16/2020	No	Tesla Stone	Review Mediation Brief & Circulate	150.00	1:00	150.00	13,815.00
11/01/2020	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	13,830.00
11/04/2020	No	Tesla Stone	File Maintenance; Circulate; Calendar	150.00	0:18	45.00	13,875.00
11/16/2020	No	Tesla Stone	Serve NAR; File; File Maintenance	150.00	1:00	150.00	14,025.00
12/16/2020	No	Tesla Stone	File Maintenance; Circulate	150.00	0:06	15.00	14,040.00
12/18/2020	No	Tesla Stone	Draft & Serve Discovery SI (Set 1)	150.00	1:00	150.00	14,190.00

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
12/18/2020	No	Tesla Stone	File Maintenance; Circulate; Calendar	150.00	0:12	30.00	14,220.00
01/04/2021	No	Tesla Stone	File Maintenance; Circulate; Calendar	150.00	0:12	30.00	14,250.00
01/18/2021	No	Jean Claude Lapuyade	Legal Research - Meet and Confer Discovery Responses	550.00	3:18	1,815.00	16,065.00
01/18/2021	No	Jean Claude Lapuyade	R&R Defendant's Discovery Responses	550.00	1:30	825.00	16,890.00
01/19/2021	No	Jean Claude Lapuyade	Drafted Meet and Confer Letter and Belaire Letter	550.00	2:48	1,540.00	18,430.00
01/19/2021	No	Tesla Stone	Review M&C; Circulate; File Maintenance	150.00	0:30	75.00	18,505.00
01/19/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	18,520.00
01/25/2021	No	Jean Claude Lapuyade	Drafted Response to OC M&C Response	550.00	0:58	531.67	19,051.67
01/26/2021	No	Jean Claude Lapuyade	Draft Meet and Confer Email to OC	550.00	0:48	440.00	19,491.67
01/28/2021	No	Jean Claude Lapuyade	TCW OC Re Meet and Confer	550.00	0:42	385.00	19,876.67
02/15/2021	No	Tesla Stone	File Maintenance; Circulate	150.00	0:06	15.00	19,891.67
02/16/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	19,906.67
02/16/2021	No	Tesla Stone	Draft CMS; File & Serve	150.00	1:30	225.00	20,131.67
03/29/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	20,146.67
05/03/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	20,161.67
05/31/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	20,176.67
06/07/2021	No	Tesla Stone	File Maintenance; Circulate; Calendar	150.00	0:06	15.00	20,191.67
08/09/2021	No	Jean Claude Lapuyade	Legal Research - Mediation Brief Issues 226(a)(8)	550.00	4:12	2,310.00	22,501.67
08/25/2021	No	Tesla Stone	Review Mediation Brief & Ciculate	150.00	1:00	150.00	22,651.67
08/25/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	22,666.67
08/27/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	22,681.67
08/31/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	22,696.67
08/31/2021	No	Jean Claude Lapuyade	Prepared for Mediation Reviewed Brief and Expert Report	550.00	3:12	1,760.00	24,456.67
08/31/2021	No	Jean Claude Lapuyade	R&R and Draft Emails to OC Re Mediation Proposal	550.00	1:00	550.00	25,006.67
09/01/2021	No	Jean Claude Lapuyade	Attended Mediation with Judge West	550.00	8:00	4,400.00	29,406.67
09/30/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	29,421.67
10/12/2021	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	29,436.67
10/12/2021	No	Tesla Stone	Draft COA; File & Serve	150.00	1:00	150.00	29,586.67
12/17/2021	No	Jean Claude Lapuyade	Settlement - PAGA SAR	550.00	4:12	2,310.00	31,896.67
12/17/2021	No	Jean Claude Lapuyade	Settlement - Individual SAR	550.00	2:30	1,375.00	33,271.67
01/20/2022	No	Tesla Stone	Review MOU; Circulate for Signatures; File Maintenance	150.00	0:30	75.00	33,346.67

JCL Law Firm

Unbilled Time

Activity: All Dates

ACTIVITY DATE	POSTING	EMPLOYEE	MEMO/DESCRIPTION	RATE	DURATION	AMOUNT	BALANCE
01/21/2022	No	Jean Claude Lapuyade	Administrative Notice	550.00	0:18	165.00	33,511.67
01/21/2022	No	Jean Claude Lapuyade	Revised PAGA and Individual SARs	550.00	0:42	385.00	33,896.67
01/25/2022	No	Jean Claude Lapuyade	SAR Revisions	550.00	0:36	330.00	34,226.67
01/25/2022	No	Jean Claude Lapuyade	Settlement - Revised Long Form Settlement Agreement	550.00	1:06	605.00	34,831.67
02/08/2022	No	Jean Claude Lapuyade	Revisions to SAR and Individual Agreement	550.00	0:24	220.00	35,051.67
02/09/2022	No	Jean Claude Lapuyade	Correspondence regarding Admin Bid	550.00	0:18	165.00	35,216.67
02/09/2022	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	35,231.67
02/15/2022	No	Jean Claude Lapuyade	Revisions to PAGA SAR and Individual Agreement	550.00	0:42	385.00	35,616.67
02/22/2022	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	35,631.67
02/22/2022	No	Jean Claude Lapuyade	Pleadings - Drafted Stip to Stay	550.00	0:42	385.00	36,016.67
02/22/2022	No	Jean Claude Lapuyade	Correspondence with OC regarding PAGA SAR, Individual SAR and admin notice	550.00	0:18	165.00	36,181.67
02/23/2022	No	Tesla Stone	File Maintenance	150.00	0:06	15.00	36,196.67
02/24/2022	No	Jean Claude Lapuyade	Status update to client	550.00	0:24	220.00	36,416.67
02/28/2022	No	Tesla Stone	Review Stip to Stay; File Maintenance	150.00	0:30	75.00	36,491.67
03/01/2022	No	Jean Claude Lapuyade	Settlement - Reviewed and Revised Settlement w/ Defense Edits	550.00	1:00	550.00	37,041.67
04/01/2022	No	Tesla Stone	Review SARs; Circulate for Signatures; File Maintenance	150.00	0:48	120.00	37,161.67
04/18/2022	No	Jean Claude Lapuyade	Legal Research - MPA Issues	550.00	2:36	1,430.00	38,591.67
04/21/2022	No	Jean Claude Lapuyade	Law and Motion - Revised, Edited and Drafted MPA	550.00	3:06	1,705.00	40,296.67
05/04/2022	No	Jean Claude Lapuyade	Law and Motion - Revised Approval Motion	550.00	1:12	660.00	40,956.67
05/05/2022	No	Tesla Stone	File & Serve SA; File Maintenance	150.00	3:00	450.00	41,406.67
Total for Rendon v. Healthcare Invest (002-129)					91:04	\$41,406.67	