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

ESABELLA SERPA, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

PRIDE BAKERIES, LLC DBA PANERA
BREAD BAKERY CAFES, a California limited
liability company; PRIDE BAKERIES II, LLC
DBA PANERA BREAD BAKERY CAFES, a
California limited liability company; and DOES
1 through 10, inclusive,

Defendants.

Case No.: 30-2024-01376508-CU-OE-CXC

*[Assigned for All Purposes to the Hon.
Melissa R. McCormick, Dept. CX-105]*

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

Final Approval Hearing:

Date: October 8, 2026

Time: 2:00 p.m.

Dept.: CX-105

Action Filed: January 29, 2024

DECLARATION OF JOHN G. YSLAS

I, John G. Yslas, declare as follows:

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

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

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

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

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

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

7. Upon graduating from law school in 1996, I worked for a boutique law firm practicing general litigation which included employment law matters. Since 2000 (that is, the last 25 years) my practice has been exclusively focused on labor and employment matters including handling wage and hour class, collective and representative actions (including the California Private Attorneys General Act, or “PAGA”), including in the international law firms of Morgan,

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

7 8. In late June 2022 I left Seyfarth Shaw LLP and joined my current firm, Wilshire
8 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
9 hour class and representative actions litigating such matters on behalf of plaintiff employees in
10 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
11 defendants, I have successfully mediated the resolution of many wage and hour class, collective,
12 and representative actions. Just since starting to settle cases in late April 2023 I have already
13 successfully mediated matters in which I have been counsel or co-counsel resulting in **well over**
14 **\$280 million** in settlements and verdicts which are in the process of being finalized, and with
15 numerous upcoming mediations scheduled. In those and numerous other matters, I have managed
16 and assisted with the litigation and settlement of many wage and hour PAGA and class actions.
17 In those actions, I performed similar tasks as those performed in the course of prosecuting this
18 action. Indeed, I recently tried and prevailed in achieving a jury verdict in a certified wage and
19 hour class action in the matter of *Aguilar-Flores v. Javier's – CC LLC*, Los Angeles County
20 Superior Court, Case No. 19STCV36438 (settled after verdict).

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

28 ///

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

9 11. Jeffrey C. Bils is a Junior Partner at WLF. He graduated from the University of
10 Wisconsin–Madison with a Bachelor of Arts in Journalism and German, and received his Juris
11 Doctor from the University of California, Los Angeles School of Law in 2014. During law school,
12 he was a Senior Editor on the UCLA Law Review and an Articles Editor on the Entertainment
13 Law Review. Mr. Bils served as a Judicial Extern for the Hon. Consuelo Bland Marshall in United
14 States District Court for the Central District of California, and also for the Hon. Sandra R. Klein
15 of United States Bankruptcy Court for the Central District of California. Mr. Bils graduated
16 ranked No. 7 in his graduating class from UCLA School of Law. He was admitted to practice law
17 in the State of California in 2014. Since graduating from law school, he has focused his legal
18 work primarily on employment matters, including wage-and-hour class action and PAGA
19 representative action litigation, and he has helped obtain dozens of settlements on behalf
20 California workers, as well as on behalf of California employers during his years on the defense
21 bar. Mr. Bils is a member of the Beverly Hills Bar Association (BHBA), where he is a past
22 member of the Board of Governors and a past Chair of the Labor & Employment Law Section
23 Executive Committee. He is also a member of the California Employment Lawyers Association
24 (CELA) and the Consumer Attorneys Association of Los Angeles (CAALA). Mr. Bils’ hourly
25 billing rate is \$900.00. This hourly rate is the reasonable and usual hourly rate that Mr. Bils
26 charges for similar services.

27 12. Aram Boyadjian was a fifth-year Associate Attorney at WLF. He was admitted to
28 practice law in the State of California in 2021. Mr. Boyadjian graduated from the University of

1 California, Los Angeles, with a Bachelor of Arts in Political Science. He received his Juris Doctor
2 from Loyola Law School. During law school, he was a member of the student editorial board for
3 the International and Comparative Law Review. Since January 2021, his practice has mainly been
4 focused on wage and hour class action litigation. Mr. Boyadjian billed at an hourly rate of
5 \$600.00. This hourly rate was the reasonable and usual hourly rate that Mr. Boyadjian charged
6 for similar services.

7 13. Andrew Sandoval was a third-year Associate Attorney at WLF. He was admitted
8 to practice law in the State of California in 2022. Mr. Sandoval graduated from Azusa Pacific
9 University with a Bachelor of Arts in Economics. He received his Juris Doctor from Loyola Law
10 School. During law school, he was a Vice-President of La Raza de Loyola. Since graduating, his
11 practice has mainly been focused on wage and hour class action litigation. Mr. Sandoval billed at
12 an hourly rate of \$500.00. This hourly rate was the reasonable and usual hourly rate that Mr.
13 Sandoval charged for similar services.

14 14. Courtney M. Miller is a Settlement Attorney at WLF. She was admitted to practice
15 law in the State of California in 2019. Ms. Miller graduated from the University of California,
16 Santa Cruz, with a Bachelor of Arts in Sociology. Prior to becoming an attorney, Ms. Miller
17 worked at a boutique civil litigation firm for nearly a decade, primarily handling employment
18 matters. She earned her Juris Doctor from Southwestern Law School in 2019. Ms. Miller has
19 prosecuted wage and hour class and PAGA actions, almost exclusively, since 2020. As a handling
20 attorney, Ms. Miller obtained over \$30 million dollars in settlements on behalf of California
21 employees. Ms. Miller currently bills at an hourly rate of \$700.00. This hourly rate was the
22 reasonable and usual hourly rate that Ms. Miller charges for similar services.

23 15. WLF's hourly rates are comparable to those charged by other class action
24 plaintiffs' counsel and the firms defending class actions. WLF's rates are well within the range
25 of hourly rates that the Los Angeles legal marketplace would compensate counsel for similar
26 services accomplishing similar results. For example, in *Bronshteyn v. State of California*, Los
27 Angeles County Superior Ct. No. 19SMCV00057, Order Granting Plaintiff's Motion for
28 Statutory Attorneys' Fees and Costs filed March 30, 2023, an employment action brought by two

1 small law firms (Levy, Vinick, Burrell & Hyams LLP and Law Offices of Wendy Musell), the
2 court found that counsel's 2022 hourly rates of \$1,100 and \$1,000 per hour were reasonable for
3 the plaintiff's five senior attorneys, including \$1,000 per hour for the plaintiff's 23-year lead
4 counsel and \$850 per hour for a senior associate. These rates were then augmented by a 1.75
5 lodestar multiplier and affirmed by the California Court of Appeals. The rates (and multiplier)
6 requested here are well in line with those found reasonable in *Bronshteyn*. In *Tran v. Golden State*
7 *FC LLC, et al.* (LASC Case No. BC699931), Fee Order filed 4/8/2022, the court found hourly
8 rates of \$1,300 per hour reasonable for plaintiff's 32-year attorney and \$1,000 per hour reasonable
9 for a 14-year attorney. The multiplier here is even more compelling given Class Counsel
10 represents approximately 1,723 Class Members.

11 16. WLF has been approved as class counsel by courts in California. *See, e.g., Matthew*
12 *Veliz v. DrinkPak, LLC*, Los Angeles County Superior Court, Case No. 22STCV37384, *Ismael*
13 *Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter County Superior Court, Case No.
14 CVCS22-0002261; *Jessica Bronsal v. PTI Technologies Inc.*, Ventura County Superior Court,
15 Case No. 202200570361CUOE; *Miguel A. Vigil Ruiz v. The De Ruosi Group, LLC*, San Joaquin
16 County Superior Court, Case No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch,*
17 *LLC et al*, Los Angeles County Superior Court, Case No. 23STCV04299; *Wing v. Road*
18 *Machinery, LLC et al*, Kern County Superior Court, Case No. BCV-22-102896; *Hernandez v.*
19 *SGPS Showrig Los Angeles, Inc.*, Los Angeles County Superior Court, Case No. 22STCV28155;
20 *Azevedo v. Tulare Nursing & Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case
21 No. VCU293325; *Haser v. Universal Chain of California, Inc.*, Sacramento County Superior
22 Court, Case No. 34-2022-00332268; *Caldera v. Performance Online, Inc. et al*, Riverside County
23 Superior Court, Case No. CVRI2306013; *Goosby v. CiminoCare, Inc.*, Sacramento County
24 Superior Court, Case No. 34-2022-00329033; *Rooks v. Hot Cakes Restaurant Group, Inc.*, San
25 Joaquin County Superior Court, Case No. STK-CV-UOE-2022-11056; *Garcia v. Compassionate*
26 *Heart*, Orange County Superior Court, Case No. 30-2022-01294409-CU-OE-CXC; *Parra v.*
27 *Citrus Valley Management Services, Inc.*, Riverside County Superior Court, Case No.
28 CVRI2301768; *Torres v. HomeShield Pest Control Inc.*, Placer County Superior Court, Case No.

1 S-CV-0049525; *Cabrera v. Creekside Auto Group*, Santa Clara County Superior Court, Case No.
2 23CV415661; *Simpson v. Arcos*, Riverside Superior Court, Case No. CVRI2303337; *Payne v.*
3 *Planned Parenthood: Shasta-Diablo, Inc.*, San Francisco County Superior Court, Case No. CGC-
4 23-607359. The total hours expended on this action are reasonable and in line with those
5 expended in comparable cases.

6 17. In cases in which WLF has been approved as class counsel, California courts have
7 approved rates similar to those requested by WLF in the instant case. *See, e.g., Rodolfo Ponce v.*
8 *Youbar, Inc.*, Los Angeles County Superior Court, Case No. 22STCV37519 (WLF's rates were
9 approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils
10 (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
11 (\$500.00)); *Sabrina N. Batres v. Wish Automotive II, Inc. dba Infiniti of Van Nuys*, Los Angeles
12 County Superior Court, Case No. 23STCV19968 (WLF's rates were approved as follows: John
13 G. Yslas (\$1,500.00), Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga
14 (\$550.00), and Andrew Sandoval (\$500.00)); *Diandrea Correa et al. v. CareMeridian, LLC, et.*
15 *al.*, Los Angeles County Superior Court, Case No. 23STCV10707 (WLF's rates were approved
16 as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00),
17 Fawn F. Bekam (\$800.00), Diego Aviles (\$800.00), Aram Boyadjian (\$600.00), Harry Erganyan
18 (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Carlos Santos*
19 *Granados v. Sunny Hills Management Co., Inc.*, Los Angeles County Superior Court, Case No.
20 23STCV02109 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A.
21 Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles (\$750.00), Courtney M. Miller
22 (\$650.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00),
23 Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Kayla Kurges v. Khanna*
24 *Enterprises, Ltd. dba Sheraton Agoura Hills*, Los Angeles County Superior Court, Case No.
25 24STCV01590 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Jeffrey C.
26 Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
27 (\$500.00)); *Thora Magney et al. v. Levi Strauss & Co., et al.*, Los Angeles County Superior Court,
28 Case No. 24STCV02320 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00),

1 Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Fawn F. Bekam (\$800.00), Aram
2 Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Armando*
3 *Muniz, et al. v. Lot LLC, dba Lot Management LLC (fka Red Cow, Inc.) et. al.*, Los Angeles
4 County Superior Court, Case No. 22STCV32901 (WLF's rates were approved as follows: John
5 G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles
6 (\$750.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00),
7 Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *George Munoz v. Century West,*
8 *LLC dba Century West BMW*, Los Angeles County Superior Court, Case No. 23STCV04247
9 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith
10 (\$1,000.00), Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00),
11 and Andrew Sandoval (\$500.00)); *Ivan S. Martinez II et. al. v. The Haar Company, et. al.*, Los
12 Angeles County Superior Court, Case No. 23STCV21651 (WLF's rates were approved as follows:
13 John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego
14 Aviles (\$750.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan
15 (\$550.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)).

16 18. In support of the reasonableness of WLF's hourly rates, attached as **Exhibit 1** is a
17 true and correct excerpt from the *2025 Real Rate Report* published by Wolters Kluwer. The Real
18 Rate Report is widely relied upon in the legal industry because it is derived from anonymized
19 billing data taken from actual law firm invoices that were submitted to clients and approved for
20 payment, rather than from voluntary surveys or self-reported rates. Although the report refers to
21 "2025" rates, the data reflects rates charged by law firms during the first half of 2024 and therefore
22 represents the most recent available objective evidence of prevailing market rates.

23 a. The report provides rate information filtered by geographic market,
24 practice type, and timekeeper role. Page 33 of the report reflects rates drawn from 565 partners
25 and 518 associates practicing in Los Angeles. In that dataset, the third-quartile hourly rate is
26 \$1,365 for partners and \$982 for associates. These figures confirm that Los Angeles is a high-
27 rate legal market and that experienced litigation partners routinely bill in excess of \$1,300 per
28 hour based on rates actually paid by clients in 2024. The Real Rate Report further shows that in

1 the San Diego market, partners with 21 or more years of experience command third-quartile
2 billing rates of approximately \$1,334 per hour, confirming that highly experienced litigators in
3 major Southern California markets routinely bill at the upper end of the rate spectrum.

4 b. The 2025 Real Rate Report's practice-area-specific data further supports
5 this conclusion. Page 81 provides third-quartile rates for the detailed practice category
6 "Employment and Labor: Other Litigation," which is directly analogous to the type of work
7 performed in this case. That dataset includes 24 partners and 14 associates and shows a third-
8 quartile rate of \$1,252 per hour for partners and \$564 per hour for associates. These figures
9 demonstrate that even within the specialized employment litigation market, partners regularly bill
10 well above \$1,200 per hour based on rates actually charged to clients. When this practice-specific
11 benchmark is considered together with the broader regional market data, it confirms that WLF's
12 hourly rate for highly experienced counsel in a representative employment action falls within the
13 upper range of prevailing market rates rather than outside it.

14 c. The Real Rate Report does not provide 1st quartile or 4th quartile rates,
15 presumably to provide a sense of the average attorney billing rates. Importantly, the third quartile
16 represents the point below which 75% of rates fall; it is not a cap on reasonable rates. By
17 definition, a substantial portion of partners in the relevant benchmark market routinely bill above
18 that level, particularly those with extensive experience, specialized expertise, or leadership roles
19 in complex litigation. Courts evaluating fee requests recognize that leading counsel in complex
20 or representative actions may reasonably bill above median or third-quartile benchmarks where
21 their experience, results obtained, and responsibilities justify higher rates. We firmly believe
22 WLF belongs in the 4th quartile of attorney billing rates in Southern California. As previously
23 discussed, WLF is a nationally recognized employment litigation firm that has been named one
24 of the nation's *Best Law Firms* by U.S. News & World Report and Best Lawyers since 2020, and
25 its attorneys regularly litigate complex wage-and-hour class and representative actions
26 throughout California. I am a UCLA School of Law graduate with nearly three decades of
27 experience litigating labor and employment matters – including as a partner and holding
28 leadership roles at major international law firms when I was on the defense side for 26 years, as

1 well as substantial recent class and representative action results including being one of the few
2 attorneys in the state of California to try a wage and hour class action to verdict (and prevail),
3 and achieving results exceeding \$225 million in just the last three years since starting to settle
4 matters as a plaintiffs' attorney. My credentials and experience place my \$1,500 hourly rate
5 within the highest tier of Southern California employment litigators, consistent with rates that
6 would fall within the fourth quartile beyond those reported in the Real Rate Report.

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

- 10 a. the investigation of the matter, including meeting with Plaintiff, reviewing
11 Defendants' policies, and requesting and reviewing Plaintiff's time and pay
12 records, personnel file, and exploring the corporate structure of Defendants;
- 13 b. filing the Actions;
- 14 c. attending status conferences and meeting and conferring with Defendants
15 regarding the case;
- 16 d. meeting and conferring with Defendants regarding mediation, exchange of
17 informal discovery beforehand, and negotiating with opposing counsel
18 regarding the parameters thereof;
- 19 e. selecting a mediator and mediation date;
- 20 f. working with opposing counsel for the receipt of a sampling and analyzing the
21 same with the aid of an expert consultant and Plaintiff to perform analyses of
22 liability and exposure prior to attendance of the mediation in this matter;
- 23 g. reviewing policy documents from Defendants and researching applicable
24 defenses;
- 25 h. preparing the mediation brief and damages model for use at mediation;
- 26 i. attending the mediation;
- 27 j. communicating with Plaintiff;
- 28 k. negotiating, finalizing and fully executing the settlement agreement;

1 l. preparing and filing the Motion for Preliminary Approval and supporting
2 documents;
3 m. attending the hearing on Motion for Preliminary Approval;
4 n. communicating with any Class Members who sought additional information
5 regarding the settlement; and
6 o. preparing the instant Motion for Final Approval and supporting documents.
7 20. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced
8 in this field with **173.7** hours of work resulting in **\$160,400.00** in fees. A true and correct copy of
9 Class Counsel's detailed billing records in this matter is attached hereto as **Exhibit 2**. The chart
10 below shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
Aram Boyadjian	14.1	\$600.00	\$8,460.00
Courtney M. Miller	21.2	\$700.00	\$14,840.00
Andrew Sandoval	35.1	\$500.00	\$17,550.00
John G. Yslas	44.3	\$1,500.00	\$66,450.00
Jeffrey C. Bils	59.5	\$900.00	\$53,550.00
TOTAL	173.7		\$160,400.00

21 21. This lodestar amount results in a modest 1.09 multiplier. Class Counsel's lodestar
22 does not include the time Class Counsel will spend at the Final Approval Hearing and assisting
23 the Settlement Administrator following final approval. Class Counsel dedicated significant
24 resources to this case by dividing the tasks required according to skill level. The hours expended
25 by each attorney were not duplicative and reflect the extensive investigation and analysis that was
26 required to achieve this Settlement. This time could have been spent on other potentially lucrative
27 cases. Class Counsel's lodestar reflects the efficiencies achieved by attorneys experienced in this
28 field. Moreover, Class Counsel has singularly assumed the risk and costs of litigation purely on

1 a contingency basis. And, while Plaintiff is confident in the merits of her claims, a legitimate
2 controversy exists as to each cause of action, posing an actual risk that Plaintiff may not succeed
3 at class certification and/or trial. Any of these obstacles could have prevented recovery
4 completely, meaning Class Counsel would have been left with no compensation for all the time
5 and money invested in litigating this case. Despite these risks, Class Counsel took this case on a
6 contingency basis so that Class Members (a particularly vulnerable group of hourly paid workers)
7 could be compensated for their unpaid wages. Consequently, Class Counsel was precluded from
8 focusing on, or taking on, other cases which could have resulted in a larger, and less risky,
9 monetary gain.

10 22. In litigation costs, Wilshire Law Firm, PLC, has spent \$15,634.81 on items such
11 as filing fees, service fees, mediation fees, and expert consultant fees. A true and correct copy of
12 a breakdown of costs incurred by my office is attached hereto as **Exhibit 3**. Additionally, we will
13 incur a \$60.00 filing fee to file this Motion. Therefore, Plaintiff seeks to recover \$15,694.81 in
14 total costs. Since Class Counsel's costs did not reach the maximum of \$21,000.00, the remaining
15 \$5,305.19 will revert to and increase the Net Settlement Amount.

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

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

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

22 Executed on September 15, 2026 at Los Angeles, California.

23
24 

25 John G. Yslas
26
27
28

EXHIBIT 1



ELM Solutions

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analysis of law firm rates,
trends, and practices

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- Uncheck Enhance thin lines (if it’s checked).
- Restart Acrobat and reopen the PDF.

A Letter to Our Readers

Welcome to the latest edition of the Real Rate Report®, the legal industry's most trusted benchmark for legal billing rates.

Since 2010, the Real Rate Report has helped legal departments and law firms make smarter decisions about pricing, resourcing, and vendor management. That hasn't changed. What has changed is how we deliver those insights.

This year, the Real Rate Report is powered by LegalVIEW® DynamicInsights—our new digital-first platform that brings the same trusted LegalVIEW data to life in a more interactive, flexible, and timely way. Leveraging Wolters Kluwer's LegalVIEW database, with over \$200B in anonymized, approved, invoice data, LegalVIEW DynamicInsights offers dynamic filters, quarterly updates, and calendar-year alignment to help users tailor benchmarks to their unique needs, on demand.

The Real Rate Report remains a vital snapshot of the market, and we know many of you rely on it as a reference tool. But DynamicInsights goes further. It enables deeper exploration of rate trends by role, experience, geography, practice area, industry, and more. Whether you're negotiating rates, evaluating law firm performance, or planning budgets, DynamicInsights gives you the agility and precision today's legal environment demands.

As always, we welcome your feedback and thank our data contributors for making this work possible. We're proud to be your partner in legal analytics and look forward to continuing to deliver insights that drive better business outcomes.

Sincerely,



Brian Jorgenson

Vice President, Product Management
Wolters Kluwer ELM Solutions

Real Rate Report Overview

The Real Rate Report is powered by LegalVIEW DynamicInsights, a web-based solution that delivers dynamic, invoice-backed insights through approved legal billing rates. It enables legal professionals to analyze rate trends by role, experience, industry, geography, practice area, and more using the world's largest repository of legal spend data.

DynamicInsights leverages the same trusted LegalVIEW database that has powered the Real Rate Report for years, now encompassing over \$200B+ in anonymized, approved legal invoice data. As with previous Real Rate Reports, our data is sourced from corporations' and law firms' e-billing and time management solutions. We have included lawyer and paralegal rate data filtered by specific practice and sub-practice areas, metropolitan areas, and types of matters. This level of granularity gives legal departments and law firms the precision they need to identify areas of opportunity.

What's different with DynamicInsights?

Same source, same methodology: DynamicInsights uses the same rigorous data validation and methodology as the Real Rate Report.

- **Enhanced flexibility:** With dynamic filters, DynamicInsights enables users to tailor benchmarks to their unique needs and on demand.
- **Full year data:** DynamicInsights now aligns to a calendar year view—January through December—replacing the previous July-to-June format used in the Real Rate Report, reducing confusion and improving consistency across reporting periods.
- **More up to date:** Unlike the annual and static Real Rate Report, DynamicInsights is refreshed quarterly, offering more timely insights.
- **Digital-first access:** Delivered via a secure online interface, users can interact with the data, bookmark views, and share insights in real time.

DynamicInsights provides the same level of credibility and analytical power long trusted in the Real Rate Report with more agility and transparency for today's legal environment.

2025 Real Rate Report use considerations

- Examines law firm rates over time
- Identifies rates by location, experience, firm size, areas of expertise, industry, and timekeeper role (i.e., partner, associate, and paralegal)
- Itemizes variables that drive rates up or down

All the analyses included in DynamicInsights and this report are derived from the actual rates charged by law firm professionals as recorded on invoices submitted and approved for payment.

Examining real, approved rate information, along with the ranges of those rates and their changes over time, highlights the role these variables play in driving aggregate legal cost and income. The analyses can energize questions for both corporate clients and law firm principals.

Legal departments might ask whether they are paying the right amount for different types of legal services, while law firm principals might ask whether they are charging the right amount for legal services and whether to modify their pricing approach.

Examples of data to consider when reviewing rates:

- **Industry** – Compare spend and rate trends across various industries
- **Practice area** – Analyze cost variations in different legal practice areas
- **Detailed practice area** – Drill down into niche legal specialties for precise benchmarking
- **Am Law** – Benchmark against top-ranked law firms for competitive rate analysis
- **City** – Understand rate trends in specific metropolitan areas
- **Country** – Gain a global perspective on legal costs and spend management
- **Role** – Assess legal spend distribution across different law firm roles

Real Rate Report Overview

Understanding key statistical terms

To help interpret the legal rate data presented in DynamicInsights and this report, it's important to understand the statistical measures used. Below are definitions of the core metrics:

- **Mean (average):** The sum of all rate values divided by the total number of values added. It provides a general sense of the central tendency of the rates but can be influenced by extreme values (outliers).
- **Median:** The middle value when all rates are arranged in ascending order. If there is an even number of rates being analyzed, the median is the average of the two middle rates. It is a robust measure of central tendency of rates that is less affected by outliers.
- **First quartile (Q1):** The value below which 25% of the rates fall. It marks the lower boundary of the middle 50% of the rates and helps identify the lower range of typical values.
- **Third quartile (Q3):** The value below which 75% of the rates fall. It marks the upper boundary of the middle 50% of the rates and helps identify the upper range of typical values.
- **n:** The number of unique timekeepers contributing to the data.

These metrics are used to provide a more nuanced view of legal rates, helping users identify trends, outliers, and benchmarks across various dimensions.

See clearly. Spend wisely.

Step into the future of legal spend management with responsibly developed AI-powered solutions.



Our innovative Total Spend Management approach leverages AI-powered capabilities to empower intelligent workflows and improved outcomes.



Up to 10% savings on legal spend



Up to 20% improvement in billing guideline compliance



Increased efficiencies free up time for more value-add work

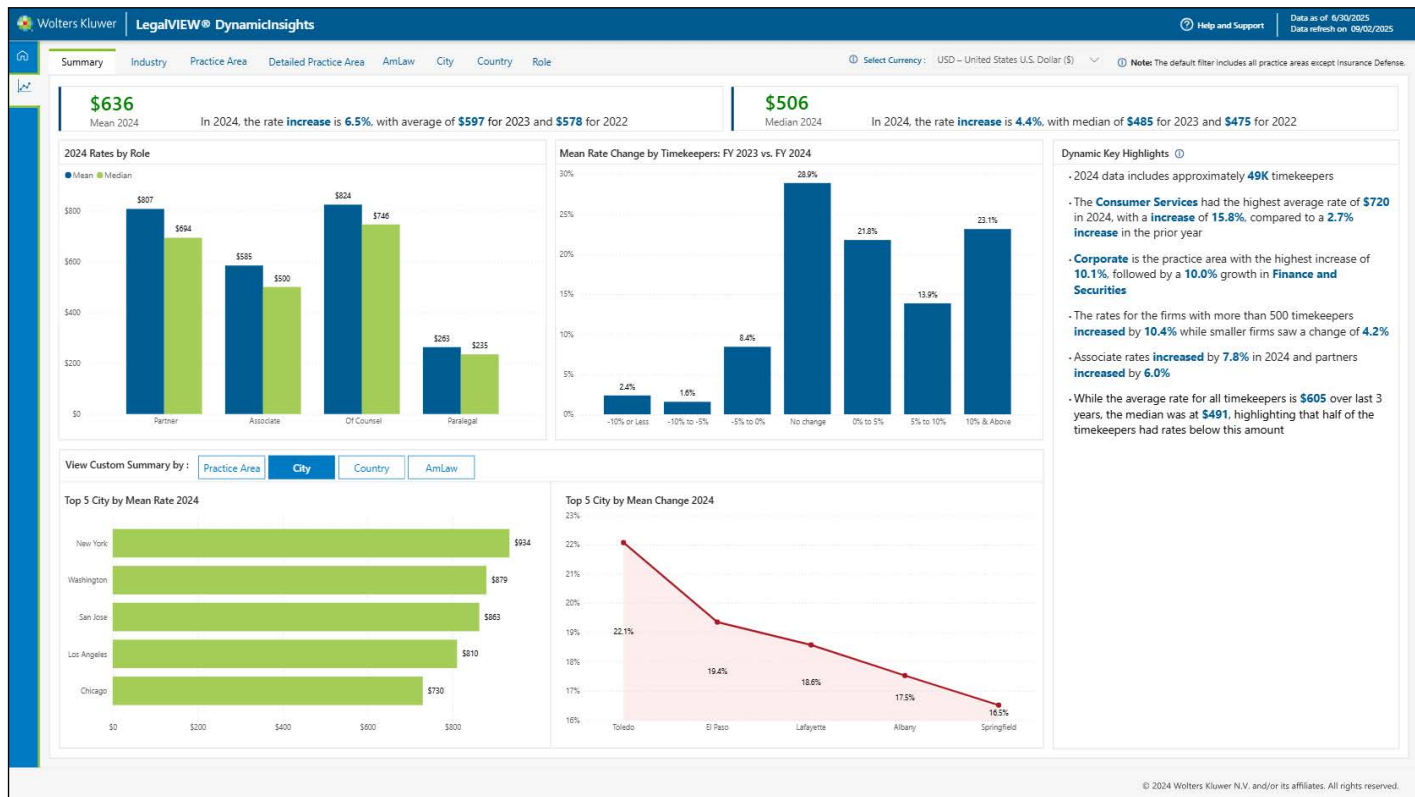
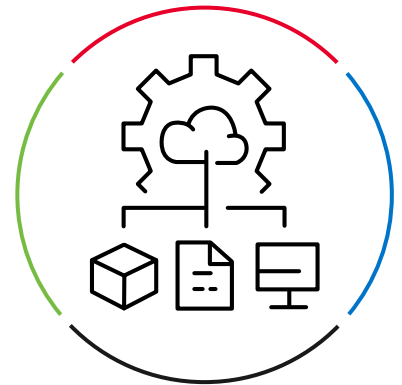


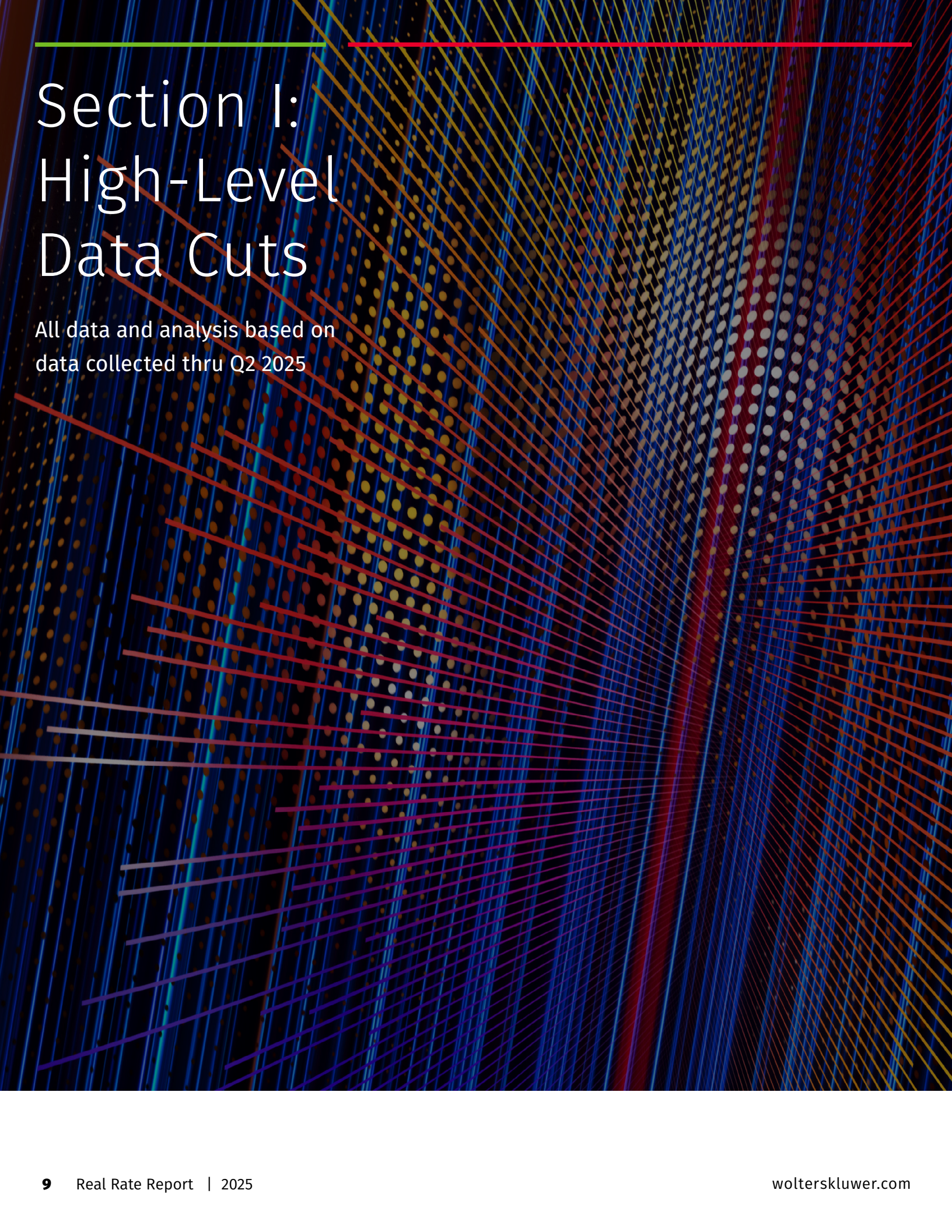
LegalVIEW® DynamicInsights

Legal rates keep climbing and 2026 will be no exception. Stay ahead with award-winning insights designed to give your team the edge in every negotiation.

Data that wins awards...and rate negotiations

- **Unmatched Data Power:** Leverages over **\$200B** in invoice-backed legal spend data to deliver deep, actionable insights.
- **Strategic Legal Spend Management:** Empowers legal teams to negotiate smarter, plan more effectively, and control costs with greater precision.
- **Enhanced Transparency & Collaboration:** Strengthens law firm-client relationships through data-driven transparency and benchmarking.
- **Insight-Driven Decision Making:** Enables analysis across key dimensions to support strategic negotiations and financial optimization.





Section I: High-Level Data Cuts

All data and analysis based on
data collected thru Q2 2025

Section I: High-Level Data Cuts

Cities
By Role

2025 Real Rates for Associate and Partner

Trend Analysis - Mean

City	Role	n	First Quartile	Median	Third Quartile	2025	2024	2023
Los Angeles CA	Partner	565	\$517	\$925	\$1,365	\$993	\$979	\$913
	Associate	518	\$485	\$720	\$982	\$761	\$741	\$684
Louisville KY	Partner	32	\$291	\$395	\$500	\$411	\$395	\$380
	Associate	19	\$275	\$290	\$342	\$304	\$274	\$268
Madison WI	Partner	10	\$275	\$420	\$491	\$420	\$443	\$563
Memphis TN	Partner	22	\$325	\$394	\$470	\$404	\$428	\$387
Miami FL	Partner	191	\$250	\$525	\$733	\$547	\$570	\$575
	Associate	128	\$175	\$330	\$479	\$357	\$389	\$393
Milwaukee WI	Partner	32	\$364	\$459	\$649	\$524	\$581	\$525
	Associate	18	\$322	\$455	\$690	\$498	\$462	\$404
Minneapolis MN	Partner	138	\$475	\$694	\$918	\$692	\$673	\$637
	Associate	111	\$333	\$450	\$620	\$485	\$467	\$432

Section I: High-Level Data Cuts

Cities
By Years of Experience

2025 Real Rates for Partner						Trend Analysis - Mean		
City	Years of Experience	n	First Quartile	Median	Third Quartile	2025	2024	2023
Phoenix AZ	21 or More Years	25	\$350	\$490	\$674	\$559	\$499	\$540
Pittsburgh PA	Fewer Than 21 Years	41	\$501	\$600	\$810	\$669	\$658	\$599
	21 or More Years	72	\$480	\$691	\$860	\$705	\$733	\$669
Portland ME	21 or More Years	18	\$386	\$435	\$484	\$418	\$421	\$381
Portland OR	Fewer Than 21 Years	17	\$402	\$465	\$525	\$599	\$536	\$509
	21 or More Years	32	\$470	\$525	\$639	\$594	\$607	\$553
Raleigh NC	21 or More Years	12	\$396	\$475	\$510	\$489	\$477	\$477
Richmond VA	Fewer Than 21 Years	10	\$604	\$703	\$855	\$707	\$746	\$687
	21 or More Years	24	\$431	\$713	\$1,084	\$739	\$756	\$726
Salt Lake City UT	Fewer Than 21 Years	12	\$395	\$447	\$459	\$422	\$445	\$412
	21 or More Years	16	\$350	\$463	\$521	\$480	\$433	\$407
San Diego CA	21 or More Years	33	\$438	\$785	\$1,334	\$894	\$898	\$882



Section II: Industry Analysis

All data and analysis based on
data collected thru Q2 2025

Section II: Industry Analysis

Consumer Services

By Detailed Practice Area and
Matter Type

2025 - Real Rates for Associate and Partner

Trend Analysis - Mean

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2025	2024	2023
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	Litigation	Partner	27	\$393	\$495	\$613	\$509	\$463	\$436
		Associate	19	\$400	\$475	\$493	\$437	\$387	\$370
Employment and Labor: Other	Litigation	Partner	24	\$564	\$692	\$1,252	\$956	\$782	\$683
		Associate	14	\$384	\$469	\$564	\$553	\$484	\$458
	Non-Litigation	Partner	25	\$450	\$574	\$695	\$579	\$573	\$548
		Associate	25	\$397	\$450	\$525	\$465	\$472	\$456
Intellectual Property: Patents	Non-Litigation	Partner	41	\$350	\$595	\$691	\$605	\$652	\$634
		Associate	51	\$208	\$373	\$517	\$382	\$378	\$389
Real Estate: Leasing	Non-Litigation	Partner	17	\$410	\$539	\$865	\$616	\$664	\$667
		Associate	10	\$278	\$404	\$617	\$482	\$444	\$478
Real Estate: Other	Non-Litigation	Partner	58	\$480	\$626	\$940	\$694	\$612	\$540
		Associate	39	\$320	\$460	\$733	\$503	\$468	\$415

EXHIBIT 2

Serpa v. Pride Bakeries, LLC

Detailed Billing

Date Completed	Task Completed	Attorney	Hours	Rate	Total
8/9/2023	Review case file and personnel file, and plan next steps	JB	2.0	\$900.00	\$1,800.00
9/22/2023	Strategize re LWDA notice letter	JB	0.3	\$900.00	\$270.00
11/28/2023	Review draft PAGA complaint	JB	0.5	\$900.00	\$450.00
12/13/2023	Strategize re call with opposing counsel	JB	0.3	\$900.00	\$270.00
12/20/2023	Confer re next steps; correspondence from opposing counsel re request for resolution	JB	1.2	\$900.00	\$1,080.00
12/21/2023	Review order re case management conference	JB	0.2	\$900.00	\$180.00
12/22/2023	Internal correspondence re notice of minute order	JB	0.2	\$900.00	\$180.00
12/27/2023	Confer re next steps	JB	0.4	\$900.00	\$360.00
1/3/2024	Correspondence from opposing counsel re responsive pleading deadline	JB	0.4	\$900.00	\$360.00
1/10/2024	Correspondence from opposing counsel re arbitration document	JB	0.2	\$900.00	\$180.00
1/11/2024	Confer re communications with Plaintiff and next steps; confer re draft email to opposing counsel re next steps	JB	0.8	\$900.00	\$720.00
1/12/2024	Discussion re letter to Plaintiff	JB	0.2	\$900.00	\$180.00

1/15/2024	Review arbitration demand; research law re arbitration demanded while court action is pending; confer re next steps; correspondence with opposing counsel asking that arbitration demand be withdrawn	JB	2.0	\$900.00	\$1,800.00
1/16/2024	Strategize re call with opposing counsel re informal discovery and next steps	JB	0.4	\$900.00	\$360.00
1/18/2024	Correspondence with opposing counsel re mediation	JB	0.3	\$900.00	\$270.00
1/29/2024	Strategize re filing of class complaint	JB	0.3	\$900.00	\$270.00
1/31/2024	Further correspondence with opposing counsel re proposed mediation	JB	0.2	\$900.00	\$180.00
2/13/2024	Correspondence with opposing counsel re mediation	JB	0.3	\$900.00	\$270.00
2/21/2024	Review minute order re status conference	JB	0.2	\$900.00	\$180.00
2/26/2024	Confer re potential extension of defendant's responsive pleading deadline	JB	0.5	\$900.00	\$450.00
3/14/2024	Strategize with team re mediation	JB	0.3	\$900.00	\$270.00
3/11/2024	Review answer to complaint	JB	0.4	\$900.00	\$360.00
3/20/2024	Strategize re joint status conference statement	JB	0.3	\$900.00	\$270.00
3/22/2024	Review minute order re status conference	JB	0.2	\$900.00	\$180.00
4/2/2024	Correspondence with mediator re mediation;	JB	0.6	\$900.00	\$540.00

	strategize with team re mediation				
4/3/2024	Correspondence from opposing counsel re mediation	JB	0.2	\$900.00	\$180.00
4/9/2024	Correspondence with mediator re mediation	JB	0.3	\$900.00	\$270.00
4/22/2024	Review stipulations re mediation	JB	0.2	\$900.00	\$180.00
4/29/2024	Strategize re mediation	JB	0.2	\$900.00	\$180.00
7/1/2024	Correspondence with mediator re mediation	JB	0.3	\$900.00	\$270.00
7/9/2024	Correspondence with opposing counsel re CMC	JB	0.2	\$900.00	\$180.00
7/10/2024	Correspondence with opposing counsel re stipulation to continue case management conference	JB	0.2	\$900.00	\$180.00
7/15/2024	Strategize re mediation; correspondence with opposing counsel re pre-mediation requests	JB	1.0	\$900.00	\$900.00
7/16/2024	Correspondence with opposing counsel re mediation data	JB	0.2	\$900.00	\$180.00
7/26/2024	Strategize re mediation; correspondence with opposing counsel re pre-mediation requests	JB	0.7	\$900.00	\$630.00
7/29/2024	Teleconf with opposing counsel re mediation	JB	0.3	\$900.00	\$270.00
7/30/2024	Correspondence with mediator re mediation; strategize re mediation	JB	0.5	\$900.00	\$450.00
10/18/2024	Review order granting stipulation to continue CMC	JB	0.3	\$900.00	\$270.00

10/23/2024	Correspondence from opposing counsel re pre-mediation informal discovery	JB	0.2	\$900.00	\$180.00
10/24/2024	Strategize re mediation	JB	1.0	\$900.00	\$900.00
10/31/2024	Correspondence from mediator re mediation; strategize re mediation	JB	0.4	\$900.00	\$360.00
11/11/2024	Correspondence with expert re mediation analysis; strategize re mediation brief	JB	0.8	\$900.00	\$720.00
11/12/2024	Strategize re mediation preparation	JB	0.5	\$900.00	\$450.00
11/14/2024	Strategize re mediation brief	JB	1.0	\$900.00	\$900.00
11/15/2024	Review mediation brief	JB	3.0	\$900.00	\$2,700.00
11/18/2024	Finalize mediation brief for submission	JB	2.2	\$900.00	\$1,980.00
11/19/2024	Strategize re settlement authority	JB	0.3	\$900.00	\$270.00
11/20/2024	Correspondence with opposing counsel re mediation brief and mediation; prepare for mediation	JB	1.3	\$900.00	\$1,170.00
11/21/2024	Mediation	JB	8.0	\$900.00	\$7,200.00
11/25/2024	Strategize re mediator's proposal and next steps	JB	0.4	\$900.00	\$360.00
11/26/2024	Strategize with settlement team re mediator's proposal	JB	0.3	\$900.00	\$270.00
11/27/2024	Correspondence from mediator re settlement; strategize re acceptance by all parties of mediator's proposal	JB	0.4	\$900.00	\$360.00
1/10/2025	Correspondence with opposing counsel and strategize with	JB	0.5	\$900.00	\$450.00

	settlement team re MOU				
1/30/2025	Review filed CM statement	JB	0.3	\$900.00	\$270.00
1/31/2025	Review minute order re CMC	JB	0.2	\$900.00	\$180.00
2/3/2025	Strategize re case deadlines	JB	0.3	\$900.00	\$270.00
4/2/2025	Strategize re next steps	JB	0.3	\$900.00	\$270.00
4/4/2025	Strategize re draft settlement agreement	JB	0.5	\$900.00	\$450.00
4/21/2025	Discussion re communications with plaintiff; correspondence to plaintiff	JB	0.4	\$900.00	\$360.00
5/15/2025	Review CM statement	JB	0.2	\$900.00	\$180.00
5/16/2025	Review Minute Order re CMC	JB	0.2	\$900.00	\$180.00
5/19/2025	Further discussion re communications with plaintiff; further correspondence to plaintiff	JB	0.3	\$900.00	\$270.00
6/20/2025	Further correspondence to plaintiff	JB	0.3	\$900.00	\$270.00
8/7/2025	Strategize re settlement agreement and next steps	JB	0.3	\$900.00	\$270.00
8/8/2025	Strategize re settlement agreement	JB	0.2	\$900.00	\$180.00
8/11/2025	Strategize re case deadlines	JB	0.3	\$900.00	\$270.00
9/9/2025	Strategize re settlement	JB	0.3	\$900.00	\$270.00
9/17/2025	Correspondence with opposing counsel re settlement; correspondence re client; strategize re settlement	JB	0.3	\$900.00	\$270.00

9/18/2025	Correspondence with opposing counsel re settlement; strategize re settlement	JB	0.6	\$900.00	\$540.00
9/18/2025	Discussion re communications with plaintiff	JB	0.3	\$900.00	\$270.00
9/22/2025	Strategize re signatures on settlement agreement	JB	0.3	\$900.00	\$270.00
9/25/2025	Strategize re recovery of costs	JB	0.4	\$900.00	\$360.00
9/30/2025	Correspondence with opposing counsel re settlement agreement	JB	0.2	\$900.00	\$180.00
10/12/2025	Strategize re draft settlement agreement	JB	0.2	\$900.00	\$180.00
10/15/2025	Strategize re settlement agreement	JB	0.2	\$900.00	\$180.00
10/16/2025	Strategize re administration bids; correspondence with administrator re bids	JB	0.5	\$900.00	\$450.00
11/5/2025	Correspondence with opposing counsel re joint statement re approval motion; review revised draft settlement agreement	JB	0.4	\$900.00	\$360.00
11/6/2025	Correspondence with opposing counsel re signatures on MOU	JB	0.2	\$900.00	\$180.00
11/9/2025	Strategize re settlement	JB	0.2	\$900.00	\$180.00
11/12/2025	Correspondence with opposing counsel re settlement agreement; analysis for approval motion	JB	0.5	\$900.00	\$450.00
11/13/2025	Review note to file re CMC and approval motion deadline;	JB	0.3	\$900.00	\$270.00

	strategize re approval motion				
11/14/2025	Strategize re notice of ruling in class case	JB	0.3	\$900.00	\$270.00
11/18/2025	Strategize re notice of ruling in PAGA case	JB	0.3	\$900.00	\$270.00
12/1/2025	Analysis re declaration in support of preliminary approval motion and other papers	JB	0.5	\$900.00	\$450.00
12/2/2025	Strategize with settlement team re consolidation for settlement	JB	0.2	\$900.00	\$180.00
12/3/2025	Discussion re preliminary approval motion hearing	JB	0.3	\$900.00	\$270.00
12/10/2025	Correspondence with opposing counsel re stipulation to consolidate actions; review draft stipulation	JB	0.5	\$900.00	\$450.00
12/11/2025	Discussion re communications with plaintiff	JB	0.2	\$900.00	\$180.00
12/15/2025	Further correspondence with opposing counsel re stipulation to consolidate; strategize re preliminary approval	JB	0.4	\$900.00	\$360.00
12/16/2025	Review served stipulation	JB	0.2	\$900.00	\$180.00
1/9/2026	Review notice of ruling and note to file re preliminary approval hearing	JB	0.3	\$900.00	\$270.00
1/11/2026	Correspondence with opposing counsel re settlement agreement and approval hearing; analysis for approval	JB	0.3	\$900.00	\$270.00

1/12/2026	Analysis re preliminary approval	JB	0.4	\$900.00	\$360.00
2/17/2026	Strategize re joint status conference statement	JB	0.3	\$900.00	\$270.00
2/26/2026	Correspondence with opposing counsel re settlement agreement	JB	0.2	\$900.00	\$180.00
3/18/2026	Correspondence with opposing counsel re settlement agreement	JB	0.2	\$900.00	\$180.00
4/2/2026	Review proposed revised settlement agreement; strategize re settlement agreement and class notice	JB	0.4	\$900.00	\$360.00
4/20/2026	Correspondence with opposing counsel re amended settlement agreement	JB	0.2	\$900.00	\$180.00
4/21/2026	Correspondence from administrator re class notice	JB	0.2	\$900.00	\$180.00
4/23/2026	Correspondence with administrator re Spanish translation	JB	0.2	\$900.00	\$180.00
4/30/2026	Discussion re preliminary approval hearing date	JB	0.2	\$900.00	\$180.00
5/7/2026	Review tentative ruling re preliminary approval	JB	0.2	\$900.00	\$180.00
5/13/2026	Correspondence with opposing counsel re class notice	JB	0.2	\$900.00	\$180.00
5/20/2026	Review preliminary approval order	JB	0.3	\$900.00	\$270.00
5/22/2026	Correspondence with administrator re preliminary approval order	JB	0.2	\$900.00	\$180.00
5/25/2026	Correspondence with administrator re	JB	0.2	\$900.00	\$180.00

	settlement administration				
5/26/2026	Further correspondence with administrator re settlement administration	JB	0.2	\$900.00	\$180.00
5/28/2026	Correspondence with administrator and among counsel re data	JB	0.2	\$900.00	\$180.00
6/2/2026	Correspondence from administrator re notice packet	JB	0.2	\$900.00	\$180.00
6/3/2026	Correspondence from administrator re notice packet	JB	0.2	\$900.00	\$180.00
6/4/2026	Further correspondence with administrator and opposing counsel re final calculations; strategize re calendar	JB	0.3	\$900.00	\$270.00
6/9/2026	Correspondence with administrator re mailing of notices; review case file	JB	0.3	\$900.00	\$270.00
6/15/2026	Correspondence with class member re PAGA settlement inquiry	JB	0.2	\$900.00	\$180.00
6/16/2026	Correspondence with administrator re weekly report	JB	0.2	\$900.00	\$180.00
6/22/2026	Strategize re call from class member	JB	0.3	\$900.00	\$270.00
6/23/2026	Correspondence from administrator re status report	JB	0.2	\$900.00	\$180.00
6/24/2026	Review order re continuance for approval hearing	JB	0.2	\$900.00	\$180.00
6/30/2026	Correspondence from administrator re status report	JB	0.2	\$900.00	\$180.00

7/17/2026	Correspondence from administrator re workweek disputes	JB	0.2	\$900.00	\$180.00
7/20/2026	Correspondence between defense counsel and administrator re objections	JB	0.2	\$900.00	\$180.00
7/21/2026	Correspondence from administrator re weekly report	JB	0.2	\$900.00	\$180.00
7/28/2026	Correspondence from administrator re status report	JB	0.2	\$900.00	\$180.00
8/4/2026	Correspondence from administrator re status report	JB	0.2	\$900.00	\$180.00
8/11/2026	Correspondence from administrator re weekly report	JB	0.2	\$900.00	\$180.00
8/18/2026	Correspondence from administrator re weekly report	JB	0.2	\$900.00	\$180.00
8/19/2026	Analysis re approval motion	JB	0.4	\$900.00	\$360.00
8/24/2026	Review case file; analysis re approval motion	JB	1.3	\$900.00	\$1,170.00
			59.0		\$53,100.00
7/2/2023	Review intake; research Defendant	AB	0.3	\$600.00	\$180.00
8/9/2023	Email re personnel file; review / save	AB	0.1	\$600.00	\$60.00
9/22/2023	Review LWDA / PAGA letter for approval; filing	AB	0.5	\$600.00	\$300.00
12/13/2023	Review AS notes on call w OC	AB	0.1	\$600.00	\$60.00
12/14/2023	Review OC email re matter; potential	AB	0.1	\$600.00	\$60.00

	mediation; personnel file				
12/20/2023	Review OC email re matter	AB	0.1	\$600.00	\$60.00
12/21/2023	Review CMC; complex order	AB	0.1	\$600.00	\$60.00
1/11/2024	Review notes on call w OC re arbitration agreement	AB	0.1	\$600.00	\$60.00
1/16/2024	Review OC email re matter; demand for arbitration	AB	0.1	\$600.00	\$60.00
1/16/2024	Review notes on call w OC	AB	0.1	\$600.00	\$60.00
1/16/2024	Review OC email re mediation	AB	0.1	\$600.00	\$60.00
2/21/2024	Review CMO order	AB	0.1	\$600.00	\$60.00
2/22/2024	Review OC email re draft stipulation re mediation	AB	0.1	\$600.00	\$60.00
3/5/2024	Review OC email re mediation; potential stipulation	AB	0.1	\$600.00	\$60.00
3/14/2024	Review OC email re mediation; scheduling	AB	0.1	\$600.00	\$60.00
3/14/2024	discuss cmc report w team	AB	0.1	\$600.00	\$60.00
3/21/2024	Review minute order re matter	AB	0.1	\$600.00	\$60.00
3/22/2024	Discus CMC; attendance w team	AB	0.1	\$600.00	\$60.00
3/24/2024	Review minute order; notice of reassignment	AB	0.1	\$600.00	\$60.00
3/24/2024	Review minute order re status conference	AB	0.1	\$600.00	\$60.00
4/1/2024	Review OC email re mediation; scheduling	AB	0.1	\$600.00	\$60.00
4/2/2024	Review email(s) re mediation; scheduling	AB	0.1	\$600.00	\$60.00
4/3/2024	Review OC email re mediation; scheduling	AB	0.1	\$600.00	\$60.00

4/8/2024	Review mediator office email re matter; scheduling	AB	0.1	\$600.00	\$60.00
4/9/2024	Review mediator office email re mediation; scheduling	AB	0.1	\$600.00	\$60.00
4/23/2024	Review OC email re matter; mediation; stay	AB	0.1	\$600.00	\$60.00
7/10/2024	Review email from OC re joint stipulation to continue CMC; draft	AB	0.1	\$600.00	\$60.00
7/10/2024	Review D draft stipulation re CMC continuance	AB	0.2	\$600.00	\$120.00
7/10/2024	Edit D draft stipulation re CMC continuance	AB	0.3	\$600.00	\$180.00
7/10/2024	Email(s) w OC re draft stipulation re CMC continuance	AB	0.2	\$600.00	\$120.00
7/10/2024	Emails w OC re CMC	AB	0.1	\$600.00	\$60.00
7/16/2024	Review email from OC re stipulation re CMC; continuance	AB	0.1	\$600.00	\$60.00
7/16/2024	Review OC email re mediation data; production	AB	0.1	\$600.00	\$60.00
7/17/2024	CMC - review docket; prepare	AB	0.3	\$600.00	\$180.00
7/25/2024	Review OC email re mediation; data production	AB	0.1	\$600.00	\$60.00
7/29/2024	Review OC email re mediation; data production; scheduling	AB	0.1	\$600.00	\$60.00
7/30/2024	Review OC email re mediation; scheduling	AB	0.1	\$600.00	\$60.00
10/27/2024	Review mediation expert email re data	AB	0.1	\$600.00	\$60.00
11/1/2024	Review mediation expert email re data; analysis	AB	0.1	\$600.00	\$60.00

11/11/2024	Review mediation expert email re data; analysis	AB	0.1	\$600.00	\$60.00
11/20/2024	Review OC email re mediation; brief	AB	0.1	\$600.00	\$60.00
4/4/2025	Review internal correspondence re MOU; S.A.	AB	0.2	\$600.00	\$120.00
5/9/2025	Review internal correspondence re client	AB	0.1	\$600.00	\$60.00
6/19/2025	Review internal correspondence re client	AB	0.1	\$600.00	\$60.00
9/9/2025	Review internal emails re client	AB	0.1	\$600.00	\$60.00
9/9/2025	Review internal emails re client	AB	0.1	\$600.00	\$60.00
10/13/2025	Review internal emails re S.A.; class notice	AB	0.1	\$600.00	\$60.00
10/16/2025	Review class administrator email re administration; quote	AB	0.1	\$600.00	\$60.00
11/28/2023	Review PAGA complaint for approval; filing	AB	0.4	\$600.00	\$240.00
12/26/2023	Review team emails re matter; contact w client	AB	0.1	\$600.00	\$60.00
1/12/2024	Review OC email re matter; arbitration document	AB	0.1	\$600.00	\$60.00
1/18/2024	Review OC email re potential mediation	AB	0.1	\$600.00	\$60.00
1/18/2024	Review email from OC re matter; arbitration	AB	0.1	\$600.00	\$60.00
3/8/2024	Review OC email re mediation; scheduling	AB	0.1	\$600.00	\$60.00
3/27/2024	CMC - review docket	AB	0.1	\$600.00	\$60.00
4/22/2024	Review OC email re stipulation re mediation	AB	0.1	\$600.00	\$60.00

7/1/2024	Review email from mediator office re matter; mediation	AB	0.1	\$600.00	\$60.00
7/9/2024	Email(s) w OC re matter; joint report	AB	0.2	\$600.00	\$120.00
7/11/2024	CM report - finalize; file	AB	0.2	\$600.00	\$120.00
7/15/2024	Review OC email re mediation data; production	AB	0.1	\$600.00	\$60.00
7/26/2024	Review OC email re mediation; data production	AB	0.1	\$600.00	\$60.00
7/29/2024	Review JB notes on call w OC re matter	AB	0.1	\$600.00	\$60.00
7/29/2024	Review email from mediator office re mediation; scheduling	AB	0.1	\$600.00	\$60.00
10/23/2024	Review OC email re mediation; data production	AB	0.1	\$600.00	\$60.00
10/23/2024	CMC - review docket; prepare - review order re continuance	AB	0.2	\$600.00	\$120.00
10/24/2024	Review OC email re mediation; data production	AB	0.1	\$600.00	\$60.00
10/24/2024	Review OC email re mediation; data production	AB	0.1	\$600.00	\$60.00
10/31/2024	Review email from mediation service re mediation; scheduling	AB	0.1	\$600.00	\$60.00
11/13/2024	Review message from client	AB	0.1	\$600.00	\$60.00
11/14/2024	Review OC email re mediation; data production	AB	0.1	\$600.00	\$60.00
11/14/2024	Review email from mediator office re Zoom link	AB	0.1	\$600.00	\$60.00
11/27/2024	Review mediator email re proposal; settlement	AB	0.1	\$600.00	\$60.00

1/31/2025	Review minute order re CMC; continuance	AB	0.2	\$600.00	\$120.00
1/31/2025	Email team re minute order re CMC; continuance	AB	0.1	\$600.00	\$60.00
2/4/2025	Discuss CMC; attendance w team	AB	0.2	\$600.00	\$120.00
4/29/2025	Review internal correspondence re client	AB	0.1	\$600.00	\$60.00
5/15/2025	Review OC email re CM report	AB	0.1	\$600.00	\$60.00
5/20/2025	Review internal correspondence re client	AB	0.2	\$600.00	\$120.00
5/20/2025	Review minute order re matter	AB	0.1	\$600.00	\$60.00
12/1/2025	Review internal email re MPA; filing	AB	0.1	\$600.00	\$60.00
12/1/2025	Review internal emails re MPA (approval) motion	AB	0.2	\$600.00	\$120.00
12/1/2025	Review OC email re stipulation re consolidation	AB	0.1	\$600.00	\$60.00
12/2/2025	Review internal email re MPA (approval)	AB	0.1	\$600.00	\$60.00
12/2/2025	Review internal email re stipulation to consolidate	AB	0.1	\$600.00	\$60.00
12/2/2025	Review email from administrator re MPA	AB	0.1	\$600.00	\$60.00
12/2/2025	Review internal emails re stipulation to amend	AB	0.1	\$600.00	\$60.00
8/7/2025	Review internal correspondences re settlement; MOU	AB	0.2	\$600.00	\$120.00
8/8/2025	Review email re client	AB	0.1	\$600.00	\$60.00
8/8/2025	Review OC email re joint status report; filing	AB	0.1	\$600.00	\$60.00
8/11/2025	Review minute order re CMC	AB	0.2	\$600.00	\$120.00

8/11/2025	Send internal correspondence re minute order	AB	0.2	\$600.00	\$120.00
8/15/2025	Review emails re client	AB	0.2	\$600.00	\$120.00
8/19/2025	Review email from service provider re client	AB	0.1	\$600.00	\$60.00
9/3/2025	Review email re client	AB	0.1	\$600.00	\$60.00
9/18/2025	Review OC email re S.A.	AB	0.1	\$600.00	\$60.00
9/18/2025	Review emails re client	AB	0.1	\$600.00	\$60.00
9/18/2025	Review internal emails re client	AB	0.1	\$600.00	\$60.00
9/19/2025	Review internal email re client	AB	0.1	\$600.00	\$60.00
9/19/2025	Review internal emails re MOU	AB	0.1	\$600.00	\$60.00
9/22/2025	Review internal email re MOU; signatures	AB	0.1	\$600.00	\$60.00
9/25/2025	Review internal emails re litigation costs	AB	0.1	\$600.00	\$60.00
9/30/2025	Review OC email re MOU; signatures	AB	0.1	\$600.00	\$60.00
9/30/2025	Review internal emails re MOU; signatures	AB	0.1	\$600.00	\$60.00
11/6/2025	Review OC email re CM statement; filing	AB	0.1	\$600.00	\$60.00
11/6/2025	Review OC email re MOU; settlement	AB	0.1	\$600.00	\$60.00
11/6/2025	Review OC email re class notice; S.A.	AB	0.1	\$600.00	\$60.00
11/12/2025	Review OC email re S.A.; signatures	AB	0.1	\$600.00	\$60.00
11/12/2025	Review internal emails re S.A.; MPA	AB	0.1	\$600.00	\$60.00
11/12/2025	Review internal emails re CMC; attendance	AB	0.1	\$600.00	\$60.00
11/13/2025	Review internal email re CMC; attendance	AB	0.1	\$600.00	\$60.00
11/13/2025	Review minute order re matter	AB	0.1	\$600.00	\$60.00

12/11/2025	Review internal emails re stipulation re consolidation	AB	0.1	\$600.00	\$60.00
12/12/2025	Review email to OC re stipulation re consolidation	AB	0.1	\$600.00	\$60.00
12/15/2025	Review OC email re stipulation re consolidation	AB	0.1	\$600.00	\$60.00
			14.1		\$8,460.00
1/10/2024	call with opposing counsel	AS	0.5	\$500.00	\$250.00
1/16/2024	call with opposing counsel	AS	0.6	\$500.00	\$300.00
1/29/2024	class complaint	AS	1.1	\$500.00	\$550.00
3/1/2024	email to OC re mediation	AS	0.5	\$500.00	\$250.00
3/20/2024	Joint Statement	AS	0.8	\$500.00	\$400.00
11/13/2024	Mediation brief	AS	4.1	\$500.00	\$2,050.00
11/15/2024	Mediation brief	AS	8.3	\$500.00	\$4,150.00
11/18/2024	Mediation brief	AS	3.4	\$500.00	\$1,700.00
1/30/2025	CMC Statement	AS	0.9	\$500.00	\$450.00
4/4/2025	Class notice	AS	3.1	\$500.00	\$1,550.00
4/4/2025	MOU	AS	1.8	\$500.00	\$900.00
5/15/2025	Joint statement	AS	1.5	\$500.00	\$750.00
5/19/2025	Letter to client	AS	1.3	\$500.00	\$650.00
10/16/2025	Settlement agreement	AS	2.0	\$500.00	\$1,000.00
10/16/2025	Emails re administration bids	AS	0.5	\$500.00	\$250.00
10/23/2025	Email re settlement agreement	AS	0.3	\$500.00	\$150.00
11/5/2025	Review opc's edits to settlement agreement	AS	0.8	\$500.00	\$400.00
11/6/2025	Email to opc re settlement agreement	AS	0.2	\$500.00	\$100.00
11/6/2025	CM Statement	AS	0.5	\$500.00	\$250.00
11/12/2025	Email to opc re settlement agreement	AS	0.2	\$500.00	\$100.00
11/13/2025	Hearing	AS	1.2	\$500.00	\$600.00
11/14/2025	Notice of ruling	AS	0.2	\$500.00	\$100.00

12/10/2025	Stipulation re Consolidation	AS	1.3	\$500.00	\$650.00
			35.1		\$17,550.00
1/13/2024	Analysis of facts, research related to filing of complaint and related litigation issues	JY	5.8	\$1,500.00	\$8,700.00
1/28/2024	Follow up review of facts, review law, evaluate plan to litigate and discovery	JY	4.2	\$1,500.00	\$6,300.00
2/5/2024	Analysis of discovery issues, discovery to potentially propound and key issues	JY	4.6	\$1,500.00	\$6,900.00
3/12/2024	Evaluation of key documents and items to resolve case and approach to same	JY	1.3	\$1,500.00	\$1,950.00
3/19/2024	Evaluation of state of case and strategy	JY	0.6	\$1,500.00	\$900.00
5/25/2024	Analysis and research related to case to litigate or resolve and tending to related issues	JY	6.7	\$1,500.00	\$10,050.00
11/16/2024	Prepare for mediation, analysis and input related to key issues and research related to same	JY	7.9	\$1,500.00	\$11,850.00
11/21/2024	Prepare for and analysis re mediation and resolution issues	JY	6.7	\$1,500.00	\$10,050.00
1/10/2025	Attention to settlement and approval issues and evaluate same	JY	3.7	\$1,500.00	\$5,550.00
8/19/2026	Review and analysis of mediation papers and related work related to approval motion	JY	2.8	\$1,500.00	\$4,200.00

			44.3		\$66,450.00
11/14/2025	Draft Plaintiff's declaration in support of MPA	CM	0.5	\$700.00	\$350.00
12/1/2025	Email correspondence to the administrator re obtaining a declaration in support of the MPA	CM	0.2	\$700.00	\$140.00
12/1/2025	Interoffice correspondence re current costs for this matter	CM	0.2	\$700.00	\$140.00
12/1/2025	Draft attorney declaration in support of MPA	CM	1.0	\$700.00	\$700.00
12/1/2025	Interoffice email correspondence re draft attorney declaration in support of MPA	CM	0.2	\$700.00	\$140.00
12/1/2025	Draft proposed order for MPA	CM	0.4	\$700.00	\$280.00
12/1/2025	Draft notice of motion and points and authorities for MPA	CM	4.0	\$700.00	\$2,800.00
12/1/2025	Draft proof of service for MPA	CM	0.1	\$700.00	\$70.00
12/1/2025	Email correspondence with defense counsel re MPA drafts and consolidation	CM	0.2	\$700.00	\$140.00
12/1/2025	Finalize MPA drafts	CM	0.2	\$700.00	\$140.00
12/10/2025	Draft stipulation and proposed order to consolidate actions	CM	0.5	\$700.00	\$350.00
12/12/2025	Email correspondence to defense counsel re draft stipulation and proposed order to consolidate actions	CM	0.1	\$700.00	\$70.00

12/15/2025	Email correspondence with defense counsel re draft stipulation and proposed order to consolidate actions	CM	0.2	\$700.00	\$140.00
1/8/2026	Review tentative ruling for MPA and interoffice email correspondence re same	CM	0.5	\$700.00	\$350.00
1/8/2026	Attend hearing on Plaintiff's MPA	CM	0.2	\$700.00	\$140.00
1/9/2026	Prepare hearing memo for Plaintiff's MPA	CM	0.2	\$700.00	\$140.00
1/9/2026	Prepare notice of ruling for hearing on Plaintiff's MPA	CM	0.3	\$700.00	\$210.00
3/24/2026	Interoffice correspondence re costs for this matter	CM	0.2	\$700.00	\$140.00
3/26/2026	Draft amendment to settlement agreement and revise class notice	CM	1.0	\$700.00	\$700.00
3/26/2026	Email correspondence to defense counsel re the draft amendment and revised class notice	CM	0.1	\$700.00	\$70.00
3/28/2026	Email correspondence to defense counsel re the draft amendment and revised class notice	CM	0.6	\$700.00	\$420.00
3/30/2026	Email correspondence from defense counsel re the draft amendment and revised class notice	CM	0.1	\$700.00	\$70.00
4/3/2026	Email correspondence to defense counsel re the draft amendment and revised class notice	CM	0.2	\$700.00	\$140.00

4/6/2026	Email correspondence from defense counsel re the draft amendment and revised class notice	CM	0.1	\$700.00	\$70.00
4/14/2026	Revise amendment to settlement agreement and revise class notice	CM	0.1	\$700.00	\$70.00
4/14/2026	Email correspondence with defense counsel re the draft amendment and revised class notice	CM	0.1	\$700.00	\$70.00
4/20/2026	Email correspondence with administrator re translation of the revised class notice	CM	0.2	\$700.00	\$140.00
4/20/2026	Email correspondence from administrator re translation of the revised class notice	CM	0.2	\$700.00	\$140.00
4/23/2026	Email correspondence to defense counsel re final issue in tentative ruling to address	CM	0.2	\$700.00	\$140.00
4/24/2026	Email correspondence with defense counsel re final issue in tentative ruling to address	CM	0.2	\$700.00	\$140.00
4/24/2026	Draft Plaintiff's supplemental declaration in support of MPA	CM	0.2	\$700.00	\$140.00
4/28/2026	Draft attorney declaration in support of MPA	CM	1.5	\$700.00	\$1,050.00
4/28/2026	Draft revised proposed order for MPA	CM	0.3	\$700.00	\$210.00
4/28/2026	Draft proof of service for supplemental MPA papers	CM	0.1	\$700.00	\$70.00

4/28/2026	Review proposed order cover sheet for the revised proposed order for MPA	CM	0.1	\$700.00	\$70.00
5/7/2026	Review tentative ruling for further MPA	CM	0.3	\$700.00	\$210.00
5/13/2026	Further revise class notice	CM	0.2	\$700.00	\$140.00
5/13/2026	Email correspondence with administrator re translation of the further revised class notice	CM	0.2	\$700.00	\$140.00
5/14/2026	Draft further revised proposed order for MPA	CM	0.3	\$700.00	\$210.00
5/14/2026	Draft proof of service for further revised proposed order	CM	0.1	\$700.00	\$70.00
5/20/2026	Receipt and review of MPA order	CM	0.1	\$700.00	\$70.00
5/22/2026	Email correspondence to administrator re commencing settlement administration	CM	0.2	\$700.00	\$140.00
6/4/2026	Review timeline, preliminary calculations and class notice packet and confirm same to administrator	CM	0.3	\$700.00	\$210.00
6/24/2026	Receipt and review of order continuing MFA hearing	CM	0.1	\$700.00	\$70.00
8/18/2026	Email correspondence from administrator and dense counsel re administrator's draft declaration	CM	0.1	\$700.00	\$70.00
8/31/2026	Complete collection of other attorneys' hours and detailed billing	CM	0.4	\$700.00	\$280.00

9/4/2026	Review costs for this matter	CM	0.1	\$700.00	\$70.00
9/4/2026	Revise administrator's draft declaration and email correspondence re same	CM	0.2	\$700.00	\$140.00
9/9/2026	Draft proof of service for MFA	CM	0.1	\$700.00	\$70.00
9/11/2026	Email correspondence with administrator and defense counsel re including disputes as an exhibit; review of disputes	CM	0.4	\$700.00	\$280.00
9/11/2026	Draft proposed order and judgment for MFA	CM	0.4	\$700.00	\$280.00
9/11/2026	Draft attorney declaration in support of MFA	CM	0.5	\$700.00	\$350.00
9/11/2026	Interoffice email correspondence re draft attorney declaration in support of MFA	CM	0.1	\$700.00	\$70.00
9/11/2026	Draft notice of motion and points and authorities for MPA	CM	2.5	\$700.00	\$1,750.00
9/14/2026	Email correspondence to defense counsel re MFA drafts	CM	0.1	\$700.00	\$70.00
			21.2		\$14,840.00

EXHIBIT 3

			All Transactions			
Accrual Basis						
Type	Date	Num	Memo	Description	Amount	Balance
Mediation Fees						
	4/9/2024	627196	Judicate West	50% Mediation Fees	\$6,375.00	\$ 6,375.00
Total MEDIATION FEES					\$6,375.00	\$ 6,375.00
Consultant Fees						
	12/5/2024	13412	Berger Consulting Group, LLC	10.20 hours of work	\$4,590.00	\$ 4,590.00
Total CONSULTANT FEES					\$4,590.00	\$ 4,590.00
Filing and Service Fees						
	01/12/2026	CC013126TA-0734	One Legal LLC	Notice	\$22.98	\$ 22.98
	02/19/2026	CC022826TA-1672	Orange County Superior Court	Document Retrieval	\$7.50	\$ 30.48
	04/24/2026	CC043026TA-2299	One Legal LLC	Declaration	\$21.94	\$ 52.42
	05/14/2026	CC053126TA-0956	One Legal LLC	Proposed Order	\$21.94	\$ 74.36
	05/27/2026	CC053126TA-2722	Orange County Superior Court	Document Retrieval	\$50.93	\$ 125.29
	11/17/2025	CC113025TA-1713	One Legal LLC	Notice	\$21.89	\$ 147.18
	12/16/2025	CC123125TA-1644	One Legal LLC	Stipulation and Order	\$43.57	\$ 190.75
	12/17/2025	CC123125TA-1669	One Legal LLC	Stipulation and Order	\$43.57	\$ 234.32
	08/08/2025	CC083125TA-1226	One Legal LLC	CMS	\$18.53	\$ 252.85
	08/11/2025	CC083125TA-1230	One Legal LLC	Change of Address	\$26.02	\$ 278.87
	08/11/2025	CC083125TA-1231	One Legal LLC	Change of Address	\$27.05	\$ 305.92
	11/06/2025	CC113025TA-0486	One Legal LLC	CMS	\$19.57	\$ 325.49
	11/18/2025	CC113025TA-1777	One Legal LLC	Notice	\$21.89	\$ 347.38
	12/02/2025	CC123125TA-0269	One Legal LLC	Motion	\$84.87	\$ 432.25
	12/02/2025	CC123125TA-0297	One Legal LLC	Declaration	\$21.89	\$ 454.14
	01/04/2024	69859	Valpro Attorney Services, LLC	Process Service	\$135.00	\$ 589.14
	12/04/2023	21723087	One Legal LLC	Complaint	\$1,492.98	\$ 2,082.12
	12/11/2023	21759132	One Legal LLC	Complaint - Related Document	\$66.92	\$ 2,149.04
	12/11/2023	21759133	One Legal LLC	Complaint - Related Document	\$113.25	\$ 2,262.29
	12/08/2023	21772922	One Legal LLC	POS	\$15.65	\$ 2,277.94
	12/08/2023	21772943	One Legal LLC	POS	\$15.65	\$ 2,293.59
	01/04/2024	21908864	One Legal LLC	Notice	\$16.68	\$ 2,310.27
	02/01/2024	22118711	One Legal LLC	Complaint	\$1,495.04	\$ 3,805.31
	02/15/2024	22148674	One Legal LLC	Complaint - Related Document	\$180.16	\$ 3,985.47
	02/15/2024	22148675	One Legal LLC	Complaint - Related Document	\$66.92	\$ 4,052.39
	02/08/2024	22195302	One Legal LLC	Complaint - Related Document	\$17.71	\$ 4,070.10
	02/08/2024	22195351	One Legal LLC	Complaint - Related Document	\$17.71	\$ 4,087.81
	03/08/2024	22332552	One Legal LLC	Notice	\$17.71	\$ 4,105.52
	03/20/2024	22497354	One Legal LLC	Joint Statement	\$17.71	\$ 4,123.23
	03/21/2024	22504665	One Legal LLC	CMS	\$15.39	\$ 4,138.62
	07/11/2024	23306547	One Legal LLC	Proposed Order	\$28.00	\$ 4,166.62
	07/13/2024	23309178	One Legal LLC	Stipulation and Order	\$38.30	\$ 4,204.92
	10/18/2024	23962125	One Legal LLC	Stipulation and Order	\$40.47	\$ 4,245.39
	10/18/2024	23962216	One Legal LLC	Stipulation and Order	\$40.47	\$ 4,285.86
	01/30/2025	24618316	One Legal LLC	CMS	\$18.53	\$ 4,304.39
	05/15/2025	25397323	One Legal LLC	CMS	\$18.53	\$ 4,322.92
	10/02/2023		Department of Industrial Relations	PAGA Notice Fee	\$75.00	\$ 4,397.92
	01/12/2024	70303	Valpro Attorney Services, LLC	Process Service	\$135.00	\$ 4,532.92
	06/01/2025	91089	Valpro Attorney Services, LLC	Process Service	\$135.00	\$ 4,667.92
Total FILING AND SERVICE FEES					\$4,667.92	\$ 4,667.92
Other Costs						
	7/2/2023	E-3150906	Docusign	Docusign Envelope	\$1.89	\$ 1.89
Total OTHER COSTS					\$1.89	\$ 1.89
TOTAL					\$15,634.81	\$ 15,634.81