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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ALEXIS BARTRAM and LOURDES
CONTRERAS, individuals, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

v.

LAKESHORE LEARNING MATERIALS,
LLC, a California limited liability company;
and DOES 1-50, Inclusive,

Defendants.

Case No.: 23STCV21174

**DECLARATION OF WILLIAM C.
SUNG IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: July 3, 2025

Time: 9:00 a.m.

Judge: Hon. Laura A. Seigle

Dept.: 17

1 **JUSTICE FOR WORKERS, P.C.**

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6 Attorneys for Plaintiffs

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1 I, William C. Sung, hereby declare as follows:

2 1. I am an attorney licensed to practice law in the state of California and have been
3 admitted to practice before this Court. I am an attorney with the law firm of Justice for Workers,
4 P.C., counsel of record for Plaintiff Lourdes Contreras (“Plaintiff Contreras”) in this action. I am
5 lead counsel for Plaintiff Contreras in this case and I have personal knowledge of the matters stated
6 herein and if called and sworn as a witness, I would and could competently testify under oath
7 thereto.

8 **ATTORNEY QUALIFICATIONS**

9 2. My qualifications are as follow: I received my J.D. from the University of Southern
10 California Gould School of Law in 2011. During law school, I served as the Senior Content Editor
11 on the Southern California Law Review where I published the article: *Taking the Fight Back to Title*
12 *VII: A Case for Redefining “Because of Sex” to Include Gender Stereotypes, Sexual Orientation,*
13 *and Gender Identity*, Southern California Law Review, Volume 84:2 (Jan. 2011). During law
14 school, I also served as a judicial extern to U.S. Ninth Circuit Judge, Hon. Kim M. Wardlaw, and
15 U.S. Bankruptcy Court Judge, Hon. Ernest M. Robles; served as a law clerk to the General Counsel
16 of JM Eagle; and participated in the law school’s Employer Legal Advice Clinic.

17 3. After passing the California Bar, in December 2011, I began practicing management-
18 side employment law at the Los Angeles office of Lewis Brisbois Bisgaard & Smith LLP
19 (“LBBS”). In 2013, I began focusing my practice at Lewis Brisbois on representing employers in
20 wage and hour class and PAGA action lawsuits. In January 2017, I was elevated to the position of
21 partner and vice chair of Lewis Brisbois’ Wage & Hour Class Action Practice Group. In November
22 2020, I was elevated as the co-chair of Lewis Brisbois Wage & Hour Class Action Practice Group,
23 becoming one of the youngest attorneys to chair a practice group at Lewis Brisbois. In January
24 2022, I was voted in as an equity partner, becoming one of the youngest equity partners and the
25 third Asian American equity partner in the history of this 1,500-attorney firm.

26 4. In May 2023, I left Lewis Brisbois and co-founded Barber Ranen LLP.

27 5. In July 2023, I joined Justice for Workers, P.C. (“JFW”) and began heading its
28 Complex Litigation Practice Group where I focus my practice on representing employees in wage

1 and hour class and PAGA action lawsuits.

2 6. In my current practice at JFW, I serve as the lead plaintiff's counsel on over 100
3 pending class and/or PAGA actions. In addition to this matter, I have resolved over 30 other class
4 and/or PAGA actions at mediation. The following are cases in which I have received final or
5 preliminary approval of class action and/or PAGA settlement and I was appointed as class and/or
6 PAGA counsel: *Jorge Nieto v. Pick-Your-Part Auto Wrecking*, Riverside Superior Court Case No.
7 CVRI2402255, approval of PAGA settlement granted on May 29, 2025; *Ted Kim v. Hyundai*
8 *America Technical Center, Inc.*, San Bernardino Superior Court Case No. CIVSB2326861, approval
9 of PAGA settlement granted on May 21, 2025; *Eric Echeverria v. Fireclay Tile Inc.*, San Benito
10 Superior Court Case No. CU-23-00249, final approval of class/PAGA settlement granted on May 7,
11 2025; *Isaias Velasco v. Nature's Produce*, Los Angeles County Superior Court Case No.
12 23STCV23811, approval of PAGA settlement granted on April 29, 2025; *Norma Borquez v. Smart*
13 *Metals Recycling LLC*, Yolo Superior Court Case No. CV2024-0050, final approval of class/PAGA
14 settlement granted on April 4, 2025; *Juan Hinojos Campos v. Applied Technology Group, Inc.*,
15 Kern Superior Court Case No. BCV-23-103067, final approval of class/PAGA settlement granted
16 on March 11, 2025; *Dennisha Lampkin v. Sunstates Security, Inc.*, Riverside Superior Court Case
17 No. CVRI2305600, final approval of class/PAGA settlement granted on December 18, 2024; *Pedro*
18 *Hernandez v. Edmund A. Gray Co.*, Los Angeles Superior Court Case No. 24STCV04118,
19 preliminary approval of class/PAGA settlement granted on April 9, 2025; *Jose Regalado v. United*
20 *Markets*, Marin County Superior Court Case No. CV0001169, preliminary approval of class/PAGA
21 settlement granted on March 28, 2025; *Mushfiqur Chowdhury v. CWT US, LLC*, Los Angeles
22 Superior Court Case No. 23STCV25373, preliminary approval of class/PAGA settlement granted
23 on March 24, 2025; *Alexis Bartram v. Lakeshore Learning Materials, LLC*, Los Angeles Superior
24 Court Case No. 23STCV21174, preliminary approval of class/PAGA settlement granted on March
25 5, 2025; and *Randall Bachman v. Geodis Logistics LLC*, Riverside Superior Court, Case No.
26 CVRI2400956, preliminary approval of class/PAGA settlement granted on January 22, 2025.

27 7. During my tenure as a wage and hour class action defense attorney, I have
28 represented employers in over 80 wage and hour class and/or PAGA action lawsuits. The following

1 is a list of wage and hour class and/or PAGA actions where I served as lead defense counsel or
2 primary handling attorney and in which final settlement approval was granted, I tried the case to
3 verdict, or I obtained a denial of motion for class certification: *Sylvia Martinez v. CCS Engineering*
4 *Fresno, Inc., et al.*, Los Angeles Superior Court, No. 22STCV14985, filed May 4, 2022 (PAGA
5 settlement approved on May 13, 2023); *Fidel Cruz v. Crescent Hotels & Resorts, LLC*, Sacramento
6 Superior Court, No. 34-2021-00299126, filed April 20, 2021 (PAGA settlement approved on
7 January 14, 2022); *Sidney Judge v. Aliso Viejo Brewing Company*, Orange County Superior Court,
8 No. 30-2021-01178139-CU-OE-CXC, filed January 8, 2021 (Class/PAGA settlement approved on
9 January 18, 2023); *Joseph Montgomery v. Copart, Inc.*, Sacramento Superior Court, No. 34-2020-
10 00280733, filed June 15, 2020 (Class/PAGA settlement approved on February 14, 2023); *Khawla*
11 *Majdoub v. Argent Hotel Management, LLC, et al.*, San Francisco Superior Court, No.
12 CGC20582921, filed February 13, 2020 (Class/PAGA settlement approved on September 9, 2022);
13 *Irene Quesada v. California Commerce Club, Inc.*, Los Angeles Superior Court, No.
14 19STCV41482, filed November 18, 2019 (PAGA settlement approved on November 17, 2021); *FPI*
15 *Management Wage and Hour Cases*, Los Angeles Superior Court, No. JCCP5050, filed August 19,
16 2019 (Class/PAGA settlement of two included cases approved on September 9, 2022); *Stephanie*
17 *Ouellette v. MKTG, Inc, et al.*, Los Angeles Superior Court, No. 19STCV27487, filed August 2,
18 2019 (Class/PAGA settlement approved on March 21, 2023); *Naomi Guynn-Neupane v. Magna*
19 *Legal Services, LLC, et al.*, U.S. District Court, Northern District of California, No. 5:19-CV-
20 02652, filed May 15, 2019 (Plaintiff's motion for class certification denied and defendant's motion
21 for summary judgment granted on October 6, 2021); *Janelle Murphy v. BBVA Compass*,
22 Sacramento Superior Court, No. 34-2018-00241658, filed September 28, 2018 (Class/PAGA
23 settlement approved on November 20, 2020); *George Gunn v. Shimadzu Precision Instruments,*
24 *Inc.*, Los Angeles Superior Court, No. BC719424, filed August 31, 2018 (Class/PAGA settlement
25 approved on June 22, 2020); *Lizbeth Garcia v. The Bay Clubs Company LLC*, San Diego Superior
26 Court, No. 37-2018-00029247-CU-OE-CTL, filed June 13, 2018 (PAGA settlement approved on
27 March 14, 2022); *Miguel Casillas v. FPI Management, Inc.*, Sacramento Superior Court, No. 34-
28 2018-00227643, filed February 22, 2018 (PAGA settlement approved on October 10, 2018); *Jesus*

1 *A. Hernandez v. J.V.C. Trucklines, Inc.*, San Bernardino Superior Court, No. CIVDS1714857, filed
2 August 3, 2017 (Class/PAGA settlement approved on May 22, 2018); *Mireya Castrejon v. CCS*
3 *Orange County Janitorial, Inc.*, Orange County Superior Court, No. 30-2017-00920076-CU-OE-
4 CXC, filed May 12, 2017 (Class/PAGA settlement approved on November 17, 2021); *Alfonso*
5 *Valadez v. California Commerce Club, Inc.*, Los Angeles Superior Court, No. BC644587, filed
6 December 20, 2016 (PAGA settlement approved on December 17, 2021); *Loreta B. Gharghani v.*
7 *Gefer Farms, Inc., et al.*, Los Angeles Superior Court, No. BC624938, filed June 23, 2016 (PAGA
8 settlement approved on January 14, 2021); *Salvador Magana v. Normandie Club Incorporated*, Los
9 Angeles Superior Court, No. BC621737, filed May 25, 2016 (Class/PAGA settlement approved on
10 October 26, 2018); *Kejuan Moore v. Farwest Insulation Contracting*, Los Angeles Superior Court,
11 No. BC588118, filed July 15, 2015 (PAGA settlement approved on August 26, 2016); *Maria*
12 *Dominguez v. Viva Bargain Center, Inc., et al.*, Los Angeles Superior Court, No. BC588049, filed
13 July 14, 2015 (Class/PAGA settlement approved on June 13, 2017); *Valentin Maracine v. Mesa*
14 *Verde Convalescent Hospital, Inc.*, Orange County Superior Court, No. 30-2015-00780115-CU-
15 OE-CXC, filed April 1, 2015 (Class/PAGA settlement approved on July 7, 2017); *Judy Pittacora, et*
16 *al. v. Aurora Vista Del Mar, LLC*, Ventura County Superior Court, No. 56-2014-00454445-CU-OE-
17 VTA, filed June 20, 2014 (Class/PAGA settlement approved on October 20, 2016); *Iffat "Iffy" Khan*
18 *v. FPI Management, Inc.*, Los Angeles Superior Court, No. BC541747, filed April 4, 2014
19 (Class/PAGA settlement approved on January 4, 2018); *Michael Luparello v. VIP Tours of*
20 *California, Inc., et al.*, Los Angeles Superior Court, No. BC538570, filed March 6, 2014 (First-
21 chaired certified class action trial through judgment on August 16, 2019); *Bertram Riddick v. WDI*
22 *International, Inc.*, Los Angeles Superior Court, No. BC507786, filed May 2, 2013 (Class
23 settlement approved on February 21, 2017); *Pedro Aviles v. Super A Foods, Inc.*, Los Angeles
24 Superior Court, No. BC504376, filed March 29, 2013 (Class/PAGA settlement approved on March
25 9, 2016); *Jose Chavez v. Vallarta Food Enterprises, Inc., et al.*, Los Angeles Superior Court, No.
26 BC490630, filed August 21, 2012 (Class/PAGA settlement approved on November 10, 2014); and
27 *Melinda Gonzalez v. Workforce Outsourcing, Inc., et al.*, Los Angeles Superior Court, No.
28 BC489320, filed July 31, 2012 (Class/PAGA settlement approved on February 5, 2016).

1 8. As counsel for Plaintiff Contreras and the Class, I have been intimately involved in
2 this case since its inception and I believe that the proposed Settlement is an excellent result for the
3 Class.

4 **THE REQUESTED ATTORNEYS' FEES ARE REASONABLE AS A PERCENTAGE OF**
5 **THE COMMON FUND CONFIRMED BY A LODESTAR "CROSS-CHECK"**

6 9. All of the class and/or PAGA settlements I have negotiated as class or PAGA
7 counsel, including the cases that have been granted preliminary or final approval in Paragraph 6,
8 *supra*, include approximately one-third of the common fund as attorney's fees. All of the court-
9 approved class and/or PAGA settlement I have negotiated as a defense attorney include attorney's
10 fees based on a percentage of the common fund with most percentages being between 30% to 35%.

11 10. The billing rates requested for me and Tiffany Luu are reasonable in view of the
12 market rates for attorneys in the Los Angeles community who have been practicing for 14 years and
13 four years, respectively, and specializing in wage and hour class action practice. My firm works
14 exclusively on a contingency fee basis. My proposed hourly rate of \$850 and Ms. Luu's proposed
15 hourly rate of \$500 are reasonable in light of our respective skills, wage and hour class action
16 litigation experience, reputation, and fee awards to other attorneys of similar experience in
17 California. Both Ms. Luu and I have been approved at similar hourly rates in *Jorge Nieto v. Pick-*
18 *Your-Part Auto Wrecking*, Riverside Superior Court Case No. CVRI2402255, approval of PAGA
19 settlement granted on May 29, 2025; *Ted Kim v. Hyundai America Technical Center, Inc.*, San
20 Bernardino Superior Court Case No. CIVSB2326861, approval of PAGA settlement granted on
21 May 21, 2025; *Eric Echeverria v. Fireclay Tile Inc.*, San Benito Superior Court Case No. CU-23-
22 00249, final approval of class/PAGA settlement granted on May 7, 2025; *Isaias Velasco v. Nature's*
23 *Produce*, Los Angeles County Superior Court Case No. 23STCV23811, approval of PAGA
24 settlement granted on April 29, 2025; *Norma Borquez v. Smart Metals Recycling LLC*, Yolo
25 Superior Court Case No. CV2024-0050, final approval of class/PAGA settlement granted on April
26 4, 2025; *Juan Hinojos Campos v. Applied Technology Group, Inc.*, Kern Superior Court Case No.
27 BCV-23-103067, final approval of class/PAGA settlement granted on March 11, 2025; *Dennisha*
28 *Lampkin v. Sunstates Security, Inc.*, Riverside Superior Court Case No. CVRI2305600, final

1 approval of class/PAGA settlement granted on December 18, 2024.

2 11. To date, I have spent approximately 108.9 hours on the case and anticipate
3 approximately 10 more hours to finalize this matter. My current total lodestar is \$92,565.00.
4 Attached hereto as **Exhibit 1** is a true and correct copy of my itemized timesheet for this matter.

5 12. To date, Ms. Luu has spent approximately 42.80 hours on the case and anticipate
6 approximately 5 more hours to finalize this matter. Ms. Luu's total lodestar is \$21,400.00. Attached
7 hereto as **Exhibit 2** is a true and correct copy of Ms. Luu's itemized timesheet for this matter.

8 13. I am seeking **\$6,848.32** in verified costs in this case, including anticipated Case
9 Anywhere access fees. Attached hereto as **Exhibit 3** is a true and correct itemized list of Class
10 Counsel's advanced costs.

11 14. Since undertaking representation of Plaintiff in this litigation, my firm has borne all
12 the costs of litigation since the filing of the Action without receiving any compensation to date.
13 During this time, my firm has advanced \$6,848.32 in litigation costs, and devoted substantial time
14 to this litigation. Given the considerable potential for adverse outcomes in this case, including, but
15 not limited to, losing on class certification and/or merits issues, the contingent risk borne by my
16 office was great. In addition to the legal and procedural challenges this lawsuit presented, there
17 were also other practical challenges. There was a real risk that my firm would not be compensated
18 for its work because we handled this matter on a purely contingent basis. Thus, Plaintiff was not
19 responsible for paying my firm's attorney's fees and I could only recover attorneys' fees if Plaintiff
20 was successful. By the time I attend the final approval hearing in this matter, I will have litigated
21 this matter for approximately 18 months with no payment, all while bearing the risk of non-payment
22 if Plaintiff was unsuccessful.

23 15. My team's efforts have included: pre-filing research and investigation; analyzing
24 Plaintiff's claims and potential defenses to the same; conducting legal research; conducting
25 extensive and informal discovery; analyzing Plaintiff's and Class Members' timekeeping and
26 payroll records and other data and documents; negotiating the long-form Settlement Agreement;
27 working on the Motion for Preliminary Approval; overseeing Notice administration; working on
28 Motion for Final Approval; and otherwise litigating this Action. In addition, I anticipate that my

1 firm will expend additional efforts appearing at the Final Approval Hearing, overseeing the
2 settlement distribution process, and working with the Administrator to submit a report to the Court
3 after distribution.

4 16. Plaintiff also seeks a Service Payment of \$10,000.00, and I believe this amount is
5 reasonable. Plaintiff's requested Service Payment is in recognition of the time and effort Plaintiff
6 expended and risks Plaintiff undertook on behalf of the Class. Throughout this case, Plaintiff has
7 remained in regular communication with Class Counsel to discuss litigation strategy, Defendant's
8 wage and hour policies, updates on case proceedings, and settlement proceedings. Plaintiff also
9 devoted a substantial amount of time toward providing information on the case and meeting with
10 Class Counsel to discuss and reviewing the Memorandum of Understanding, the Settlement
11 Agreement, and her declaration. Accordingly, I believe Plaintiff's requested Service Payment is
12 reasonable and should be approved.

13 I declare, under penalty of perjury under the laws of the State of California, that the
14 foregoing is true and correct.

15 Executed on June 9, 2025 at Los Angeles, California.

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William C. Sung

EXHIBIT 1

Alexis Bartram, et al. v. Lakeshore Learning Materials
Los Angeles Superior Court, Case No. 23STCV21174
Time and Task Chart - William C. Sung

Date	Description of Work	Hours
9/8/23	Review client intake and client documents; attend initial client meeting	3.8
9/9/23	Research potential causes of action, theories of liability, and/or background on Defendant	2.1
9/9/23	Research and analyze 10 potential prior class/PAGA actions against Defendant	4.7
9/10/23	Approve engagement letter to client; review signed engagement letter	0.3
9/11/23	Draft PAGA notice and Labor Code records request	1
9/11/23	Review LWDA confirmation of PAGA notice filing	0.1
9/11/23	Review PAGA notice mailing receipt to Defendant	0.1
10/13/23	Analyze and review Plaintiff's personnel and payroll records produced by Defendant	2.3
10/14/23	Research state of law re non-compete and non-disclosure agreements and enforceability of meal period waivers without language translation	5.8
10/16/23	Draft Class Action Complaint and forms for filing	2.5
10/17/23	Review Notice of Case Assignment and Court's case initial documents	0.3
10/30/23	Review ISC Order and Minute Order; draft calendar and service of process instructions re same	0.5
11/2/23	Review Proof of Service of Process	0.1
11/15/23	Draft First Amended Complaint	1
11/16/23	Review Notice of Appearance by Defendant; updated file re same	0.3
11/16/23	Draft email to Defense counsel re meet and confer on joint statement	0.1
12/1/23	Draft follow up email to Defense counsel re meet and confer on joint statement	0.1
12/1/23	Review and respond to email from Defense counsel re draft joint statement and e-service provider	0.1
12/1/23	Draft Joint Initial Status Conference Statement with Plaintiff's position	1.5
12/1/23	Draft Notice of Posting of Jury Fees	0.3
12/4/23	Review Notice of Related Cases	0.1
12/4/23	Research procedural status of related Bartram action	0.5
12/4/23	Review Defense counsel's redlines to Joint Initial Status Conference Statement	0.2
12/4/23	Draft email to Defense counsel re meet and confer on edits to joint statement	0.1
12/5/23	Review and respond to email from Defense counsel re meet and confer	0.1
12/6/23	Meet and confer call with Defense counsel	0.3
12/6/23	Revise Joint Initial Status Conference Statement; email Defense counsel re same	0.3
12/6/23	Draft email to Dept 12 Clerk re e-service order	0.1
12/6/23	Draft email to counsel for Bartram ("Co-Counsel") re meet and confer on respective cases	0.1
12/6/23	Draft email to Case Anywhere re e-service set up and information	0.3
12/6/23	Review LA CourtConnect Remote Appearance Confirmation	0.1

12/6/23	Review and respond to email from Defense counsel re finalizing Joint Initial Status Conference Statement	0.1
12/6/23	Finalize Joint Initial Status Conference Statement for filing	0.2
12/6/23	Review and respond to emails from Co-Counsel re meet and confer conference	0.1
12/6/23	Review email serving Joint Initial Status Conference Statement	0.1
12/7/23	Review Case Anywhere message re launch of e-service	0.1
12/11/23	Prepare for and attend conference call with Co-Counsel re respective cases	0.5
12/12/23	Review and respond to emails from Co-Counsel re joint prosecution	0.3
12/13/23	Review Case Anywhere message from Dept 12 re vacating ISC	0.1
12/14/23	Review and revise Joint Prosecution Agreement	0.4
12/14/23	Review and respond to email from Co-Counsel re Joint Prosecution Agreement	0.1
12/15/23	Review and respond to email from Co-Counsel re rescheduling of mediation	0.1
12/15/23	Review Joint Prosecution Agreement signed by Plaintiff Bartram	0.1
12/18/23	Conference with client re case status/strategy	1.5
1/2/24	Review fully executed Joint Prosecution Agreement; draft email to Co-Counsel re same	0.1
1/12/24	Review Plaintiff Bartram's Joint Initial Status Conference Statement and Minute Order	0.2
1/12/24	Review and respond to email from Co-Counsel re Further Status Conference date and service list	0.1
1/12/24	Review Court Order re Notice of Related Case; update file re same	0.3
1/17/24	Draft and respond to emails to Co-Counsel re case strategy	0.3
1/17/24	Litigation team meeting re case handling and strategy	1.5
1/18/24	Review email from Co-Counsel to JAMS re adding Contreras to mediation	0.1
1/18/24	Review summary of Further Status Conference	0.1
1/22/24	Conference with client re mediation	0.3
1/22/24	Review second email from Co-Counsel to JAMS re adding Contreras to mediation	0.1
1/22/24	Litigation team meeting re case handling and strategy	0.5
1/22/24	Review service email of Peremptory Challenge	0.1
1/29/24	Review email from Co-Counsel to Defense counsel re status of pre-mediation production	0.1
2/5/24	Review follow-up email from Co-Counsel to Defense counsel re status of pre-mediation production	0.1
2/6/24	Review second follow-up email from Co-Counsel to Defense counsel re status of pre-mediation production and Defense counsel's response	0.1
2/15/24	Review third follow-up email from Co-Counsel to Defense counsel re status of pre-mediation production and Defense counsel's response	0.1
2/20/24	Review fourth follow-up email from Co-Counsel to Defense counsel re status of pre-mediation production and Defense counsel's response	0.1
2/20/24	Review email from Defense counsel re unable to produce pre-mediation production by deadline and Co-Counsel's response	0.1

2/22/24	Review email from Co-Counsel to Defense counsel re new production deadline	0.1
2/23/24	Review follow-up email from Co-Counsel to Defense counsel re new production deadline and Defense counsel's response	0.1
2/28/24	Review second follow-up email from Co-Counsel to Defense counsel re status of pre-mediation production	0.1
3/1/24	Review third follow-up email from Co-Counsel to Defense counsel re status of pre-mediation production	0.1
3/4/24	Review fourth follow-up email from Co-Counsel to Defense counsel re status of pre-mediation production	0.1
3/4/24	Litigation team meeting re case handling and strategy	0.5
3/5/24	Analyze and review Defendant's premediation production	3
3/27/24	Review email from Defense Counsel re rescheduling mediation and dates	0.1
3/27/24	Review and respond email from Co-Counsel to Defense Counsel re need to select new mediator and timing of mediation	0.1
3/27/24	Review and respond to email from Co-Counsel re proposed mediator and date	0.1
3/28/24	Review email from Defense counsel re rejecting proposed mediation date	0.1
3/28/24	Litigation team meeting re case handling and strategy	0.5
4/10/24	Review email from Defense counsel re additional proposed mediators and dates	0.1
4/10/24	Review and respond to emails from Co-Counsel to Defense counsel re selecting mediation with Jeff Fuschman and date	0.1
4/10/24	Review emails from Defense counsel confirming booking of mediation and details for mediation	0.1
4/22/24	Review summary of Initial Status Conference	0.1
4/22/24	Litigation team meeting re case handling and strategy	0.5
5/15/24	Review email from Co-Counsel to Defense Counsel re updated case demographics for mediation	0.1
5/21/24	Review follow-up email from Co-Counsel to Defense Counsel re updated case demographics for mediation and Defense counsel's response	0.1
5/24/24	Review Co-Counsel proposed Joint Status Conference Statement	0.1
5/24/24	Review email from Defense counsel approving draft Joint Status Conference Statement	0.1
5/24/24	Draft email to Co-Counsel approving Joint Status Conference Statement	0.1
5/29/24	Review second follow-up email from Co-Counsel to Defense Counsel re updated case demographics for mediation and Defense counsel's response and Defense counsel's response	0.1
5/30/24	Conference with client re mediation	0.5
6/3/24	Review and respond to email from mediator re premediation conference	0.1
6/3/24	Review and signed mediation confidentiality agreement	0.1
6/3/24	Analyze and review expert analysis report	1.5
6/3/24	Continued drafting and revising mediation brief	2.8
6/3/24	Review and approve draft MOU	0.2
6/3/24	Litigation team meeting re case handling and strategy	0.5

6/4/24	Review supplemental mediation production by Defense counsel	0.3
6/6/24	Review email from Defense counsel re updated case demographics for mediation	0.1
6/6/24	Prepare for and attend full day mediation	8
6/6/24	Litigation team meeting re case handling and strategy	0.5
6/7/24	Review and respond to email from Co-Counsel re strategy conference	0.1
6/10/24	Review and respond to emails from Co-Counsel confirming strategy conference	0.1
6/12/24	Attend strategy conference with Co-Counsel	0.3
6/12/24	Review and approve draft Special Interrogatories and RFPs to Defendant	0.3
7/22/24	Review email from Co-Counsel re draft Joint Status Conference Statement and filing deadline	0.1
7/23/24	Review supplemental production of documents by Defense counsel	0.5
7/23/24	Revised draft Joint Status Conference Statement; email to parties re same	0.1
7/23/24	Review email from Defense Counsel approving draft Joint Status Conference Statement	0.1
7/24/24	Review email from Co-Counsel to Defense counsel requesting additional production and Defense counsel's response	0.1
7/31/24	Review email from Defense counsel to Co-Counsel re discovery extension	0.1
7/31/24	Review email from Co-Counsel to Defense counsel re proposed mediator for second mediation and Defense counsel's response	0.1
8/6/24	Review email from Co-Counsel to Defense counsel re follow up second mediation and Defense counsel's response	0.1
8/7/24	Review summary of Further Status Conference	0.1
8/7/24	Litigation team meeting re case handling and strategy	0.5
8/7/24	Review email from Co-Counsel to Signature Resolution re mediation details	0.1
8/8/24	Review mediation confirmation, invoices, and Rate and Fee Schedule for Monique Ngo-Bonnici; update file	0.3
8/8/24	Review draft Second Amended Stipulation for Stay	0.1
8/8/24	Review email from Defense counsel re edits to Second Amended Stipulation for Stay	0.1
8/11/24	Review email from Co-Counsel approving revisions to Second Amended Stipulation for Stay	0.1
9/3/24	Review Defendant's supplemental mediation production	1.1
9/24/24	Review Defendant's second supplemental mediation production	0.8
10/2/24	Review email from Co-Counsel to Defense counsel re supplemental production and Defense counsel's response	0.1
10/3/24	Review second email from Co-Counsel to Defense counsel re supplemental production and Defense counsel's response	0.1
10/7/24	Analyze and review expert's second analysis report	0.9
10/7/24	Continued drafting and revising second mediation brief	0.7
10/7/24	Litigation team meeting re case handling and strategy	0.5
10/10/24	Prepare for and attend full day second mediation	10
10/14/24	Conference with client re mediation and proposal	0.6

10/16/24	Review email from Co-Counsel to mediator re proposal	0.1
10/16/24	Draft email to mediator re proposal	0.1
10/16/24	Review email from mediator re proposal	0.1
10/18/24	Review and revise draft MOU	0.3
10/18/24	Review email from Co-Counsel to Defense counsel re MOU	0.1
10/21/24	Review follow up email from Co-Counsel to Defense counsel re MOU	0.1
10/21/24	Review second follow up email from Co-Counsel to Defense counsel re MOU and Defense counsel's response	0.1
10/24/24	Review Defense counsel's edits to MOU and make further edits	0.3
10/28/24	Review further edits to MOU and made further revisions	0.1
10/28/24	Review emails between Co-Counsel and Defense counsel re edits to MOU	0.2
10/28/24	Review and respond to further emails between counsel re edits to MOU	0.1
10/31/24	Review and approval finalized MOU	0.1
10/31/24	Review email from Defense counsel re finalized MOU	0.1
11/1/24	Review MOU signed by Defendant	0.1
11/1/24	Conference with client re MOU	0.8
11/1/24	Litigation team meeting re case handling and strategy	0.5
11/7/24	Continue drafting and revising class and PAGA settlement agreement	2.4
11/9/24	Review MOU signed by client; email counsel for parties re same	0.1
11/19/24	Review fully executed MOU	0.1
11/20/24	Review email from Co-Counsel to Defense counsel re proposed class and PAGA settlement agreement	0.1
12/2/24	Draft email to Defense counsel re class and PAGA settlement agreement and review response	0.1
12/9/24	Draft second email to Defense counsel re class and PAGA settlement agreement and review response	0.1
12/11/24	Review email from Co-Counsel to Defense counsel re class and PAGA settlement agreement	0.1
12/11/24	Draft email to Co-Counsel re consolidation	0.1
12/12/24	Review Defense counsel's edits to class and PAGA settlement agreement	0.4
12/12/24	Draft email to Co-Counsel re consolidation and class and PAGA settlement agreement	0.1
12/12/24	Review and respond to email from Co-Counsel re consolidation	0.1
12/12/24	Review Co-Counsel's edits to class and PAGA settlement agreement and respond	0.1
12/12/24	Review email from Co-Counsel to Defense counsel re edits to class and PAGA settlement agreement	0.1
12/16/24	Review email from Defense counsel approving class and PAGA settlement agreement	0.1
12/17/24	Review class and PAGA settlement agreement signed by Bartram	0.1
12/19/24	Conference with client re class and PAGA settlement agreement and next steps	1.4
12/23/24	Review follow up email from Co-Counsel to Defense Counsel re class and PAGA settlement agreement	0.1

12/27/24	Review class and PAGA settlement agreement signed by client and email to parties	0.1
12/27/24	Review second follow up email from Co-Counsel to Defense Counsel re class and PAGA settlement agreement	0.1
1/3/25	Review third follow up email from Co-Counsel to Defense Counsel re class and PAGA settlement agreement	0.1
1/3/25	Review and revise draft Second Amended Complaint and Stipulation for Leave to File SAC	0.5
1/6/25	Review email from Co-Counsel to Defense counsel re SAC and Stipulation for Leave	0.1
1/6/25	Review Defense counsel's edits to Stipulation for Leave to Amend	0.1
1/7/25	Review fully executed Class and PAGA settlement agreement	0.1
1/7/25	Review email from Co-Counsel to Defense counsel approving edits to Stipulation	0.1
1/7/25	Review email from Co-Counsel to Defense counsel re class data to Administrator	0.1
1/7/25	Review email from Co-Counsel to Administrator re class data transmittal	0.1
1/7/25	Review email from Defense Counsel authorizing filing of Stipulation	0.1
1/7/25	Review email from Defense counsel re conference on class data	0.1
1/7/25	Draft declarations of William Sung and Tiffany Luu for preliminary approval	1.2
1/7/25	Review email from Administrator re assigned case manager	0.1
1/7/25	Review emails between Co-Counsel and Defense Counsel re timing of class data and preliminary approval	0.1
1/8/25	Review and approve finalized Stipulation for Leave to File SAC	0.1
1/8/25	Review email from Administrator requesting information	0.1
1/8/25	Review further emails between Co-Counsel and Defense Counsel re timing of class data and preliminary approval	0.2
1/9/25	Review email from Co-Counsel to Defense Counsel re declaration for preliminary approval	0.1
1/9/25	Review Stipulation for Leave to File Second Amended Complaint served on the parties	0.1
1/10/25	Review Second Amended Complaint served on parties	0.1
1/10/25	Review Order Granting Leave to File SAC	0.1
1/11/25	Draft email to Co-Counsel re timing of preliminary approval and review response	0.1
1/13/25	Review conformed Second Amended Complaint served on parties	0.1
1/21/25	Review and approved draft Joint Case Management Statement	0.1
1/21/25	Review Joint Case Management Statement served on parties	0.1
1/21/25	Review and approve Motion for Preliminary Approval for Class/PAGA Settlement, supporting declarations, and proposed order	2.5
1/22/25	Review Motion for Preliminary Approval, supporting declarations, and proposed order served on parties	0.3
1/22/25	Conference with client re declaration for preliminary approval	0.4
11/1/24	Litigation team meeting re case handling and strategy	0.5
1/23/25	Review declaration signed by client and email to Co-Counsel	0.1

1/23/25	Review and respond to email from Co-Counsel re status of dismissal of Contreras action	0.1
1/23/25	Review declaration of client served on parties	0.1
1/25/25	Draft Request for Dismissal of Entire Action, William Sung Declaration, and Proposed Order	1.5
1/27/25	Review email from Administrator re status of class data	0.1
1/27/25	Review email from Defense counsel re timing of production of class data to adminsitator	0.1
1/30/25	Review Order dismissing Contreras action	0.1
2/10/25	Review email from Co-Counsel to Defense counsel re status of class data	0.1
2/14/25	Review email from Defense counsel re timing of production of class data to adminsitator	0.1
2/19/25	Review email from Administrator re receipt of class data	0.1
2/20/25	Review email from Co-Counsel to Administrator re declaration on workweeks	0.1
2/27/25	Review Court's tentative ruling for preliminary approval	0.1
2/28/25	Review email from Co-Counsel re intend to appear at hearing	0.1
3/3/25	Review emails between Co-Counsel and Administrator re declaration on workweeks	0.1
3/3/25	Review supplemental declaration from Administrator re workweeks	0.1
3/4/25	Review email from Co-Counsel approving supplemental declaration	0.1
3/4/25	Review supplemental declaration executed by Administrator	0.1
3/5/25	Prepare for and attend hearing on Motion for Preliminary Approval	1.2
3/5/25	Conference call with Co-Counsel re settlement approval	0.3
3/5/25	Litigation team meeting re case handling and strategy	0.5
3/6/25	Review Order Granting Preliminary Approval	0.1
3/11/25	Review and approve settlement administration timeline from Administrator	0.2
3/13/25	Review email from Co-Counsel approving administration timeline	0.1
3/17/25	Conference with client re status of settlement	0.3
3/18/25	Review email from Defense counsel approving administration timeline	0.1
3/18/25	Review and approve formatted class notice and preliminary settlement calculations from Administrator	0.3
3/18/25	Review email from Co-Counsel approving formatted class notice and preliminary settlement calculations	0.1
3/21/25	Review email from Defense counsel approving formatted class notice and preliminary settlement calculations	0.1
3/21/25	Review updated timeline for settlement administration from Administrator	0.1
3/24/25	Review email from Administrator conforming notice mailing	0.1
3/24/25	Draft email to Administrator re client's class settlement notice	0.1
3/25/25	Review client's class settlement notice and conference with client re same	0.5
3/31/25	Review notice administration report	0.1
4/8/25	Review notice administration report	0.1
4/14/25	Review notice administration report	0.1

4/22/25	Review notice administration report	0.1
4/29/25	Review notice administration report	0.1
5/6/25	Review notice administration report	0.1
5/8/25	Call from potential class member re settlement and notice	0.1
5/8/25	Draft email to administrator re information on potential class member	0.1
5/20/25	Review email from Co-Counsel to Administrator re final weekly report and declaration	0.1
5/22/25	Review final notice administration report	0.1
5/22/25	Review and approve Administrator declaration re notice administration	0.1
5/22/25	Review email from Administrator re list of opt-out class members	0.1
5/22/25	Continued drafting and revising declaration of client for final approval	0.3
5/27/25	Conference with client re declaration for final approval	0.4
5/28/25	Continued drafting and revising Motion for Final Approval	2.5
5/28/25	Drafted declarations of William Sung and Tiffany Luu in support of final approval	0.8
5/28/25	Continued drafting and revising Proposed Order and Proposed Judgment	0.4
6/9/25	Continued drafting and revising Motion for Attorney's Fees and Costs	3.1
Total Hours:		108.90
Requested Rate:		\$850
Requested Fee Amount:		\$92,565

EXHIBIT 2

Alexis Bartram, et al. v. Lakeshore Learning Materials
Los Angeles Superior Court, Case No. 23STCV21174
Time and Task Chart - Tiffany L. Luu

Date	Description of Work	Hours
1/17/24	Litigation team meeting re case handling and strategy	1.5
1/17/24	Review case file and prepare for Further Status Conference	2.5
1/18/24	Attend Further Status Conference; draft summary of hearing re same	1.1
1/18/24	Draft Peremptory Challenge	0.3
1/22/24	Conference with client re mediation	0.3
1/22/24	Review Minute Order re ISC and draft calendar instructions	0.2
1/22/24	Research Peremptory Challenge procedure and finalize Peremptory Challenge	0.9
1/22/24	Litigation team meeting re case handling and strategy	0.5
2/5/24	Review Court Order Re Case Reassignment; update file re same	0.3
3/4/24	Litigation team meeting re case handling and strategy	0.5
3/4/24	Review email from Defense counsel re demographics and production for mediation	0.2
3/25/24	Reviewed new Initial Status Conference Order and related Minute Order and update file	0.3
3/26/24	Draft email to Case Anywhere re merge Contreras and Bartram cases	0.1
3/27/24	Draft email to Co-Counsel re procedural status of Contreras and resassignment; review Co-Counsel's response	0.3
3/28/24	Draft Notice of Initial Status Conference and Reassignment and Severance Determination	0.3
3/28/24	Litigation team meeting re case handling and strategy	0.5
4/1/24	Review email from Co-Counsel to Defense counsel requesting other mediators	0.1
4/1/24	Review and respond to email from Defense counsel re proposed mediator and date	0.1
4/1/24	Review email from Co-Counsel rejecting proposed date	0.1
4/1/24	Review email confirmation for mediation with McKelvey Resolution; update file re same	0.3
4/2/24	Review and respond to email from Defense counsel re additional proposed date for mediation	0.1
4/2/24	Review and respond to emails from Co-Counsel re mediator proposed by Defense counsel	0.4
4/2/24	Review and respond to emails between Co-Counsel and Defense counsel re additional mediation dates	0.1
4/2/24	Review email from Co-Counsel to Defense counsel re whether prior mediation has been cancelled	0.1
4/3/24	Review email from McKelvey Resolution confirming cancellation of mediation	0.1
4/12/24	Draft Joint Initial Status Conference Statement in preparation for Initial Status Conference	0.8
4/12/24	Draft email to Defense counsel re Joint Initial Status Conference Statement	0.1

4/15/24	Draft follow up email to Defense counsel re Joint Initial Status Conference Statement	0.1
4/15/24	Review email from Defense counsel re Joint Initial Status Conference Statement and revisions to the same	0.1
4/15/24	Finalize draft of Joint Initial Status Conference Statement for filing and service	0.1
4/22/24	Prepare for and attend Initial Status Conference with Judge Kuhl; draft summary re same	1.1
4/22/24	Litigation team meeting re case handling and strategy	0.5
4/22/24	Review Order Re Electronic Filing and Service and address issue with email address	0.3
4/22/24	Draft email to co-counsel re Judge Kuhl's instruction re notice of related case	0.2
5/30/24	Review mediation confirmation for Jeff Fuschman and update file	0.2
5/30/24	Conference with client re mediation	0.5
6/3/24	Review and respond to email from Co-Counsel re update on mediation and briefing	0.1
6/3/24	Litigation team meeting re case handling and strategy	0.5
6/6/24	Prepare for and attend full day mediation	8
6/6/24	Litigation team meeting re case handling and strategy	0.5
6/7/24	Review Court Order re 6/10/24 Status Conference	0.1
6/12/24	Attend strategy conference with Co-Counsel	0.3
6/14/24	Review written discovery served by Co-Counsel on Defendant	0.1
7/24/24	Review and respond to email from Co-Counsel authorizing e-sign on Joint Status Conference Statement	0.1
7/24/24	Review Joint Status Conference Statement served on parties	0.1
7/31/24	Review and respond to email from Co-Counsel approving date of second mediation	0.1
8/7/24	Prepare for and attend Further Status Conference; draft summary re same	0.8
8/7/24	Litigation team meeting re case handling and strategy	0.5
8/11/24	Sign and return Second Amended Stipulation for Stay	0.1
8/11/24	Review Second Amended Stipulation to Stay served on the parties	0.1
8/20/24	Review conformed Second Amended Stipulation to Stay served on the parties	0.1
10/7/24	Litigation team meeting re case handling and strategy	0.5
10/10/24	Prepare for and attend full day second mediation	10
10/14/24	Conference with client re mediation and proposal	0.6
10/18/24	Review and approved proposed Joint Status Conference Statement from Co-Counsel	0.1
10/18/24	Review email from Defense counsel approving draft Joint Status Conference Statement	0.1
10/22/24	Review Joint Status Conference Statement served on parties	0.1
11/1/24	Conference with client re MOU	0.8
11/1/24	Litigation team meeting re case handling and strategy	0.5

11/5/24	Review Minute Order re vacating status conference and setting non-appearance; update file	0.2
12/19/24	Conference with client re class and PAGA settlement agreement and next steps	1.4
1/22/25	Conference with client re declaration for preliminary approval	0.4
11/1/24	Litigation team meeting re case handling and strategy	0.5
3/5/25	Litigation team meeting re case handling and strategy	0.5
5/27/25	Conference with client re declaration for final approval	0.4
Total Hours:		42.80
Requested Rate:		\$500
Requested Fee Amount:		\$21,400

EXHIBIT 3



June 9, 2025

Alexis Bartram, et al. v. Lakeshore Learning Materials
Los Angeles Superior Court, Case No. 23STCV21174

Date	Description of Cost Item	Invoice #	Amount
9/11/23	LWDA Filing Fee for Initial PAGA Notice	LWDA-CM-980920-23	\$75.00
9/12/23	Postage for Mailing PAGA Letter and Records Request to Defendant	N/A	\$8.53
10/17/23	e-Filing, Initial Appearance, and Complex Filing Fees for Complaint	5413407	\$1,496.64
11/2/23	Fee for Service of Process	8505889	\$95.79
11/6/23	e-Filing Fee for Proof of Service by Substitute Service	8543575	\$14.57
11/15/23	e-Filing Fee for Amended Complaint	8600118	\$14.57
11/29/23	e-Filing Fee for Notice of Posting of Jury Fees	8657209	\$169.07
1/23/24	e-Filing Fee for Peremptory Challenge	8946937	\$108.15
1/23/24	e-Filing Fee for Proof of Service	8951312	\$14.57
3/11/24	Case Anywhere System Access Fee	318638	\$136.71
3/28/24	e-Filing Fee for Notice of Initial Status Conference	9356541	\$14.57
4/16/24	e-Filing Fee for Joint Status Conference Report	9465921	\$14.57
6/3/24	Case Anywhere System Access Fee	329124	\$171.00
8/5/24	Case Anywhere System Access Fee	336085	\$97.02
8/29/24	Mediator's Fee for Mediation	PR39791	\$3,828.33
11/4/24	Case Anywhere System Access Fee	347573	\$147.00
1/28/25	e-Filing for Request for Dismissal	11202659	\$16.17
1/31/25	e-Filing for Proof of Service	11237818	\$16.17
2/6/25	Case Anywhere System Access Fee	359409	\$165.00
3/6/25	Case Anywhere System Access Fee	368056	\$49.00
4/4/25	Case Anywhere System Access Fee	379902	\$49.00
5/6/25	Case Anywhere System Access Fee	391841	\$49.00
6/2/25	Case Anywhere System Access Fee	403820	\$49.00
Future Estimated Costs	Case Anywhere System Access Fee for July 2025	N/A	\$49.00
		Total	\$6,848.32